2019-2024 Internal Work Plan

LOTT Clean Water Alliance

Introduction

The focus of LOTT's 2019-2024 strategic planning effort is the overall sustainability of the organization, in the context of substantial changes facing LOTT in the next few years. These changes involve retirement of many key staff, including executive leadership and highly skilled technical experts, and regulatory changes like reduction in LOTT's discharge limits that are expected with the completion of the state's Budd Inlet/Capitol Lake Total Maximum Daily Load (TMDL) study. The next six years will be a time of significant transitions for the utility. LOTT's Strategic Plan and this Internal Work Plan are intended to help the organization weather those transitions and continue to successfully meet its mission.

The 2019-2024 Strategic Plan is a separate, public-facing document that outlines LOTT's organizational values and performance objectives for the planning period. These objectives, along with additional metrics, provide a framework for public accountability and a means of tracking and reporting organizational and operational performance.

This Internal Work Plan is a complementary document to the Strategic Plan. It is intended as an internal tool to guide organizational development initiatives during the planning period. It builds on past efforts to improve the way LOTT does business and keep LOTT agile and prepared. The work plan includes six focus areas: emergency preparedness, knowledge management, human resources, information technology, capital planning, and planning for emerging issues. In it, staff have identified actions recommended for each of these areas to help the utility proactively meet future challenges. This plan is a working document that will be adapted over time.

The work plan was developed with participation of staff from across the organization, primarily through a series of small team meetings held in 2017 and 2018 for each focus area. Each topic team developed a comprehensive list of activities that could be undertaken to further refine existing processes, establish new processes, or otherwise improve LOTT's ability to effectively manage the topic. Combined, the lists of activities for all six focus areas represent a substantial body of work that is in addition to the day to day tasks and duties of LOTT staff. The highest priority activities from this work plan are highlighted in the Strategic Plan, and these are intended as the focus of staff efforts during the planning period. This document provides detail about how those priority activities can be accomplished and lists additional activities that may also be undertaken during the planning period as time and resources allow.

The following sections of this document address each of the six focus areas. Content in each section differs slightly, but in general, each section provides a brief description of the focus topic, the highest priority work plan actions, and the full list of activities identified for that topic. The level of detail for each section differs somewhat because of the nature of the topic and the unique make-up of the topic team. What is included here reflects the finished work products of each separate team effort. The final section of this document focuses on resources necessary for implementation, including a staffing plan that was developed as part of this overall planning effort.

The 2019-2024 Strategic Plan and accompanying Internal Work Plan were developed on a strong foundation. The previous strategic planning process, for the 2013-2018, identified overarching organizational goals and principles that still apply today. That planning effort also identified internal performance measures, with a focus on accountability and identifying for each staff member their integral role in the mission and success of the organization. This was accomplished through an ambitious effort that included active participation and input from nearly every employee in the organization. The

good work from this previous effort, which is included here as Appendices, will continue to play a role in guiding LOTT's work into the future.

Emergency Preparedness

Emergency preparedness has been identified as the highest priority work plan area for staff to focus on over the next six years. Work in this area revolves around developing clear procedures, defining staff roles, and practicing readiness to assure LOTT is ready to effectively respond to emergencies. The disaster at King County's West Point Treatment Plant in 2017, which resulted in release of over 300 million gallons of untreated wastewater into Puget Sound, millions of dollars of damage to essential infrastructure, and grave risk to plant employees, reinforced for LOTT the importance of readiness and the need to dedicate time and resources to this topic. The highest priority activities include:

- Develop response plans for a variety of emergency scenarios
- Establish a specific emergency response structure
- Assign staff to primary and back-up roles within the response structure

Emergency preparedness can be an overwhelming task, and refers to both natural disasters and man-made emergencies that vary widely in scale and severity. LOTT will focus preparedness efforts first on situations most likely to occur and to impact in-house operations. It is also important to prepare response for community-wide mass disasters that involve full system collapse, but beyond putting a response structure in place, that planning will be done later. Planning for smaller scale emergencies first will provide a foundation on which to build.

Because emergency preparedness is a high priority, this focus area was developed in two stages. The first stage involved a series of topic team meetings to develop a comprehensive list of activities and sub-tasks, with target years in which to work on each activity. This work was further refined in a second stage of work by a different team of staff to create an implementation strategy. The strategy provides a summary of top priority actions for the planning period and additional detail in the form of a table about staff members likely to be involved in each activity and various approaches to accomplishing the work. The work product from this second stage is not intended as a comprehensive strategy, but as a place to start for this substantial body of work. In the table, priority activities are highlighted and target timelines have been adjusted to reflect available staff resources.

Stage 1 Work Product – Emergency Preparedness Activities

1. Establish a specific emergency response structure.
    - Decide on an emergency response structure, such as Incident Commend Structure (ICS) (2018)
        - ICS is preferred choice in large part because it is the system used by local partners and state and federal entities
    - Take to SLT for discussion and decision to formalize
    - Ensure staff in key roles receive ICS or other system training
    - Hold training for all staff to bring them up to speed on the system, what it is, how it works, and what is expected of them in terms of training and implementation

2. Assign emergency response roles for staff (2018)
   - Establish and assign primary and back-up staff for each response role
   - Clarify roles for all staff – who are essential or non-essential personnel
   - Establish clear instructions for what each is to do in emergency – reporting in, role
   - Assign initial response roles to account for where staff live and proximity to LOTT facilities (consider potential transit disruptions like bridges and overpasses)
   - Identify support tasks for non-essential staff to support essential operational staff and pre-assign and prepare staff for those support roles

3. Develop response plans for a variety of emergency scenarios, considering LOTT's systems and processes and identifying what will go wrong first, what will go wrong next or because of the previous, and what to fix in what order.
   - Develop procedures to prevent flooding that could occur due to today's conditions (perfect storm of high tides and storm event) (2018)
     - Convene a meeting to develop a sand-bagging plan
       - Consider risks at BITP and what to sandbag first
       - Use City data on areas likely to flood and institutional knowledge as basis for where sandbagging needed
       - Use City notification "here's where you could see flooding" as trigger to begin sandbagging
     - Purchase a stockpile of sandbags and identify a source for sand
       - Look into installation of alternative structural devices to protect doorways and vulnerable areas
     - Convene a team to review flood risks at pump stations and actions needed to protect them from flooding
   - Develop a system for assessing safety of structures following an earthquake to determine if spaces can be entered safely (2018)
     - Identify pool of staff who will make initial structural safety assessments and ensure staff are trained
     - Develop a door tag system to indicate levels of safety for each structure (and prep kits for this purpose)
     - Hire a consultant to identify what to look for in each structure of the plant
       - Develop a pre-inspection form for each structure
     - Prioritize order in which structures should be assessed
     - Train all staff that a system is in place and how to comply with that system
     - Establish an on-call contract with a structural engineer to perform comprehensive structural assessments in event of earthquake
       - Staff can make initial assessments but follow-up assessments will be needed by structural engineer
   - Develop a control systems recovery plan (2018)
     - Establishing automatic back-up is a first step
       - This will be installed with the upcoming Windows upgrade
     - Need to determine priority PCs and store spare PCs as back-up
     - Review the IT Strategic Plan for description and identify additional sub-tasks
   - Develop response procedures for pump station failures (2019)
     - Establish emergency pumping and bypass plans for each station

        - Consider hiring a consultant to assist in developing procedures for each pump station
    - Identify the need for storing emergency pumps and other equipment on-site and/or establishing an agreement with supplier for priority access to equipment
    - For the Martin Way Pump Station:
        - Use the report by Parametrix as a starting point
        - Meet with City of Lacey operations staff who may have institutional knowledge related to bypassing the MWPS
- Develop response procedures for power outages (2019)
    - Establish a diesel delivery plan
        - Explore possibility of a mutual aid agreement with InterCity Transit for diesel supply
    - Develop a backup plan in the event a generator does not start up
    - Document procedures for manual startup of generators
        - Include clear flowchart of steps for each work group to ensure safety
- Develop an IT disaster recovery plan (2020)
    - Review the IT Strategic Plan for description and identify necessary tasks
    - Gather essential documents and records, store on portable devices like thumb drives, and include in emergency kits in multiple locations (BITP, MWRWP) (2018)
- Develop response procedures for earthquake (2021)
- Develop an electrical recovery plan (for longer-term catastrophic outages) (2022)
    - Establish how long the plant can run on generator power
    - Identify steps for recovery from longer term outage
- Develop procedures to prevent flooding that could occur due to future sea level rise conditions (2023)

4. Develop effective communications systems to support emergency response.
    - Establish a system for communicating status and instructions to staff on and off-site (2019)
        - Layer the notification system to account for service disruptions – i.e. a text/email system and a call-in pre-recorded message system
        - Train all staff in use of the system
    - Establish relationships and lines of communication with key contacts at each partner jurisdiction, railroad, PSE, and neighbors (2019)
        - Designate LOTT staff contacts and back-ups to coordinate with these entities
    - Explore the feasibility of coordinating with Thurston County to utilize their community notification systems (2021)

5. Complete assessments of LOTT facilities and procedures to improve emergency preparedness.
    - Engage Department of Homeland Security to conduct free vulnerability assessment (2018)
    - Identify greatest vulnerabilities/risks and develop projects to address them (2019)
    - Engage a third party to assess emergency readiness (2019)
        - This may be included in Homeland Security Assessment
    - Identify gaps in readiness and actions to address them (2020)

6. Train staff in emergency preparedness
    - Ensure staff in key roles receive ICS or other system training (2019)

- Train staff on communications systems – new notification and/or call-in system, radios, intercom, any shared interoperability with partners, etc. (2019)
- Participate in regional, interjurisdictional trainings and tabletops (2019)
- Send a team to the FEMA week-long training when available (2019-2021)
- Consider knowledge management – what specific training do staff have or need for their roles, ensure appropriate training (2020)
- Train to ensure staff can operate plant manually – dependence on MAX is high, but what if the MAX goes down? (2022)
    - Look for opportunities to pair "green" staff with veteran staff to learn manual operations
    - Develop general SOP for loss of control system
- Conduct trainings on roles and SOPs (2022)
- Consider developing Simulator further to use as training tool (first objective is to develop Simulator to reflect accurate hydraulic conditions and responses) (2023)
- Cross train between work groups for redundancy (2023)
    - Train Maintenance staff to run pump stations as back-up for Operations staff
    - Identify other needs/opportunities to cross-train for back-up
- Hold tabletop exercises to think through scenarios and identify gaps (2023)
- Conduct drills on each scenario repeatedly so response becomes second nature (2023)
- Run drills with MAX off – would require all hands on deck, staff at each BITP pump station to run things manually (2024)

7. Secure support services and supplies for emergency response.
    - Explore an agreement with Doubletree Hotel to provide priority access to LOTT staff for lodging (2018)
    - Establish emergency on-call contract with local contractor to provide priority response to LOTT in emergencies (may involve annual readiness fee (2019)
        - LOTT has a contract with Belfor for records restoration – they offer other restoration services
        - Consider the need for a construction contractor also
    - Assess equipment and supplies needed for emergency (2019)
        - Establish contracts with local rental agencies for priority access
            - May include bypass pumps, generators, other specialized equipment
        - Purchase supplies, parts, and equipment that should be kept on hand for emergency
    - Retain mutual aid agreements with partner jurisdictions (Done)

8. Complete capital projects that involve minimizing risks and liability.
    - Prioritize demolition of the Washington Street property building and paving of gravel area (2019)
    - Complete demolition of select structures at LOTT's Deschutes Valley property (former brewery property)
        - Demolish the dilapidated wood shack on the southern portion of the property (2018)
        - Remove other priority structures as identified in 2015 condition assessment memo (2020)

9. Support LOTT staff to optimize response during emergency
    - Provide staff with step-by-step instructions for what to do at home immediately after event/earthquake so they will be prepared to get their homes/families safely squared away and quickly report to work (2019)

Stage 2 Work Product – Emergency Preparedness Implementation Strategy

Work within planning period should focus on these top priority actions:

- Confirm response structure (ICS)
- Assign staff to key ICS roles (primary and back-up)
- Ensure assigned staff have time for training related to their specific role
- Identify staff to serve on emergency preparedness team
    - Is there one team for all things emergency, or
    - Are there two teams, with some possible overlap:
        - Emergency response team (ICS key roles)
        - Emergency preparedness team (work plan activities)
- Hire a consultant with relevant experience to guide emergency preparedness work
    - Have Human Resource Manager search emergency preparedness positions for similar utilities
        - Position descriptions could serve as examples for scope of work
        - Search may point out utilities that do not have positions but who hire out instead
        - Could then follow up with those utilities about who they hire and scope of work
- Establish a notification system for communicating status and instructions to staff on and off-site
- Establish relationships and lines of communication with key contact at PSE
    - ICS liaison staff member should be LOTT's main contact
- Begin work to develop response plans and "cut & run" checklists for various topics in this order:
    1. Power outage: involvement from Operations + Control Systems + Maintenance
    2. Winter storm – combined system: involvement from City + LOTT coordination (Operations, Laurie, Ken, Terri, Tyle)
    3. Winter storm – snow/ice storm: involvement from Operations + Control Systems + Maintenance
    4. Earthquake – structure condition assessment: involvement from Engineering + Consultant
    5. Pump station failures – MWPS, then CLPS, then KRPS: involvement from Operations + Control Systems + Maintenance + Engineering (City coordination for equipment use)
    6. Flooding – current conditions: involvement from Operations + Maintenance
    7. Winter storm – high flows: response plan is complete, but should be revisited occasionally with involvement from Operations
    8. Flooding – sea level rise: development of this response plan may be delayed until future planning period, with involvement from Engineering + Tyle
    9. Earthquake – massive: development of this response plan may be delayed until future planning period, with involvement from Engineering + Operations + Control Systems + Maintenance

Stage 2 Work Product – Emergency Preparedness Implementation Strategy

Tier	Topic/Action	Timeframe	Who Helps Get It Done?	How to Get It Done?	Status
	Response Structure				
Objective 1.	*Establish a specific emergency response structure*				
Task	Decide on an emergency response structure, such as ICS	2018	Dennis, Laurie	ICS already identified	Done
Task	Take to SLT for discussion and decision to formalize	2018	Dennis	Dennis takes to SLT for approval	
Task	Ensure staff in key roles receive ICS or other system training	2018	Dennis	Prep a list of proposed key staff for SLT review	
Task	Hold training for all staff to bring them up to speed on the system, what it is, how it works, and what is expected of them in terms of training and implementation	2019 Spring	Dennis	All staff safety meeting	
	Staff Roles/Assignments				
Objective 2.	*Assign emergency response roles for staff*				
Task	Establish and assign primary and back-up staff for each response role	2018	Dennis	Similar to above – discuss proposed assignments with SLT	
Task	Clarify roles for all staff – who are essential or non-essential personnel	2019 Spring	NA – all staff are essential in emergency	Make this clear at All staff safety meeting	
Task	Establish clear instructions for what each is to do in emergency – reporting in, role	2019 Spring	NA – all staff report in – assigned in the moment	Make this clear at All staff safety meeting	
Task	Assign initial response roles to account for where staff live and proximity to LOTT facilities (consider potential transit disruptions like bridges and overpasses)	Not necessary	Do not worry about this at this point, it will be incorporated into command structure		
Task	Identify support tasks for non-essential staff to support essential operational staff and pre-assign and prepare staff for those support roles	Not necessary	Do not worry about this ahead of event, will be done in the moment		
	Response Plans				
Objective 3.	*Develop response plans for a variety of emergency situations, considering LOTT's systems and processes and identifying what will go wrong first, what will go wrong next or because of the previous, and what to fix in what order*				

Task	Hire a consultant to guide staff through emergency preparedness tasks, with priority on developing response plans for most likely scenarios – flood, pump station failure, power outage, earthquake	2019	Ken, Dennis, Laurie	Look for expertise in emergency planning, preferably in wastewater treatment plants or similar utilities	
Task	Develop procedures to prevent flooding that could occur due to today's conditions (perfect storm of high tides and storm event)	2019	Tyle, Eric Christensen with Olympia	To be completed in conjunction with Olympia, participate in annual fall coordination meeting with DES and City	Active
Sub-Task	Convene a meeting to develop a sand-bagging plan • Consider risks at BITP and what to sandbag first • Use City data on areas likely to flood and institutional knowledge as basis for where sandbagging needed • Use City notification "here's where you could see flooding" as trigger to begin sandbagging	2019	Dennis, Tyle	Review Vulnerability assessment report.	
Sub-Task	Determine source of sandbags and identify a source for sand • Should LOTT purchase and maintain its own stockpile of sandbags • Coordinate with County to determine if they can supply during emergency • Look into installation of alternative structural devices to protect doorways and vulnerable areas	2020	Joe Ferris/Dennis/Tyle	Determine what needs protecting first	
Sub-Task	Convene a team to review flood risks at pump stations and actions needed to protect them from flooding	2020	Dennis, Operations		
Task	Develop a system for assessing safety of structures following an earthquake to determine if spaces can be entered safely		Brian	Engineering	
Sub-Task	Identify pool of staff who will make initial structural safety assessments and ensure staff are trained		Brian	Engineering	
Sub-Task	Develop a door tag system to indicate levels of safety for each structure (and prep kits for this purpose)		Brian	Engineering	
Sub-Task	Hire a consultant to identify what to look for in each structure of the plant • Develop a pre-inspection form for each structure		Brian	Engineering	
Sub-Task	Prioritize order in which structures should be assessed		Brian	Engineering	
Sub-Task	Train all staff that a door tag system is in place and how to comply with it		Dennis, Engineering		

Sub-Task	Establish an on-call contract with a structural engineer to perform comprehensive structural assessments in event of earthquake • Staff can make initial assessments but follow-up assessments will be needed by structural engineer		Brian	Engineering	
Task	Develop a control systems recovery plan	2019	Jim	IT	
Sub-Task	Establishing automatic back-up is a first step • This will be installed with the upcoming Windows upgrade			IT	
Sub-Task	Need to determine priority PCs and store spare PCs as back-up			IT	
Sub-Task	Review the IT Strategic Plan for description and identify additional sub-tasks			IT	
Task	Develop response procedures for pump station failures	2019		Operations/Maintenance	
Sub-Task	Establish emergency pumping and/or bypass plans for each station • Consider hiring a consultant to assist in developing procedures for each pump station (did not meet expectations in past, may need to hold internal team meetings to develop plans for each station)		Tyle/Matt/Sutton	Operations/Maintenance	
Sub-Task	Identify the need for storing emergency pumps and other equipment on-site and/or establishing an agreement with supplier for priority access to equipment		Tyle/Matt/Sutton	Operations/Maintenance	
Sub-Task	For the Martin Way Pump Station: • Use the report by Parametrix as a starting point Tech Memo • Meet with City of Lacey operations staff who may have institutional knowledge related to bypassing the MWPS		Tyle/Matt/Sutton	Operations/Maintenance Engineering	
Task	Develop response procedures for power outages	2019		Operations	
Sub-Task	Establish a diesel delivery plan • Explore possibility of a mutual aid agreement with InterCity Transit for diesel supply		Joe Ferris		
Sub-Task	Develop a backup plan in the event a generator does not start up			Operations/Maintenance	
Sub-Task	Document procedures for manual startup of generators • Include clear flowchart of steps for each work group to ensure safety			Operations/Maintenance	
Task	Develop an IT disaster recovery plan	2020	Brent, Julia	IT	
Sub-Task	Review the IT Strategic Plan for description and identify necessary tasks		Brent, Julia	IT	
Sub-Task	Gather essential documents and records, store on portable devices like thumb drives, and include in emergency kits in multiple locations (BITP, MWRWP)	2018	Dennis, Natalie		
Task	Develop response procedures for earthquake	2021			
Task	Develop an electrical recovery plan (for longer-term catastrophic outages)	2022		Control Systems	

Sub-Task	Establish how long the plant can run on generator power			Control Systems	
Sub-Task	Identify steps for recovery from longer-term outage			Control Systems	
Task	Develop procedures to prevent flooding that could occur due to future sea level rise conditions	2023	Tyle, Operations, Maintenance		
Task	Compile response plans for various scenarios into the comprehensive Emergency Response Plan, to include incident types identified above: flood, earthquake, electrical outages, etc. Develop a "rip and run" Incident Action Checklist" for various types of incidents		Safety Manager and others (Ken, Joanne, and Shawn took the FEMA training)	Use FEMA resources as a guide. Include steps for mitigation, response, and recovery	
Task	After conducting the risk assessment, identify actions needed for other types of risks, such as system contamination, flu pandemic, volcanic eruption, snow storms, etc.		Safety Manager and others (Ken, Joanne, and Sean took the FEMA training)	Use FEMA resources as a guide. Include steps for mitigation, response, and recovery	
	Communications				
Objective 4.	*Develop effective communications systems to support emergency response*				
Task	Establish a system for communicating status and instructions to staff on and off-site	2019	Brent, Dennis		
Sub-Task	Layer the notification system to account for service disruptions – i.e. a text/email system and a call-in pre-recorded message system		Dennis, Joanne		
Sub-Task	Train all staff in use of the communication/notification system		Dennis, Joanne		
Task	Establish relationships and lines of communication with key contacts at each partner jurisdiction, emergency response personnel, railroad, PSE, and neighbors	2019	Dennis, Joanne, Brian		
Sub-Task	Designate LOTT staff contacts and back-ups to coordinate with these entities		Dennis, Ken, Brian		
Task	Explore the feasibility of coordinating with Thurston County to utilize their community notification systems	2021	Safety Manager, Joanne		
Task	Determine how we would communicate in the event of widespread disruption to electrical and cell services		Dennis, Brent, Julia, Joanne		
	Preparedness Assessment				
Objective 5.	*Complete assessments of LOTT facilities and procedures to improve emergency preparedness*				
Task	Engage Department of Homeland Security to conduct free vulnerability assessment	2018	Dennis		
Task	Identify greatest vulnerabilities/risks and develop projects to address them	2019	CMG, Tyle		
Task	Engage a third party to assess emergency readiness	2019	Dennis		
Task	Identify gaps in readiness and actions to address them	2020			

	Training				
Objective 6.	*Train staff in emergency preparedness*				
Task	Ensure staff in key roles receive ICS or other system training	2019	Dennis		
Task	Train staff on communications systems – new notification and/or call-in system, radios, intercom, any shared interoperability with partners, etc.	2019	Dennis, Joanne, Brent		
Task	Participate in regional, interjurisdictional trainings and tabletops	2019	Dennis, Joanne		
Task	Send a team to the FEMA week-long training when available	2019-2021	Matt, Joanne (alternate?)		
Task	Consider knowledge management – what specific training do staff have or need for their roles, ensure appropriate training	2020		SLT	
Task	Train to ensure staff can operate plant manually – dependence on MAX is high, but what if the MAX goes down?	2022		Operations	
Sub-Task	Look for opportunities to pair "green" staff with veteran staff to learn manual operations			Operations	
Sub-Task	Develop general SOP for loss of control system			Control Systems	
Task	Conduct in-house trainings on roles and SOPs	2022			
Task	Consider developing Simulator further to use as training tool (first objective is to develop Simulator to reflect accurate hydraulic conditions and responses)	2023			
Task	Cross-train between work groups for redundancy	2023			
Sub-Task	Train Maintenance staff to run pump stations as back-up for Operations staff				
Sub-Task	Identify other needs/opportunities to cross-train for back-up				
Task	Hold tabletop exercises to think through scenarios and identify gaps	2023			
Task	Conduct drills on each scenario repeatedly so response becomes second nature	2023			
Task	Run drills with MAX off – would require all hands on deck, staff at each pump station to run things manually	2024			
	Support/Supplies				
Objective 7.	*Secure support services and supplies for emergency response*				
Task	Explore an agreement with Doubletree Hotel to provide priority access to LOTT staff for lodging	2018		Finance	
Task	Establish emergency on-call contract with local contractor to provide priority response to LOTT in emergencies (may involve annual readiness fee) • LOTT has a contract with Belfor for records restoration – they offer other restoration services	2019		Finance/Engineering	

	• Consider the need for a construction contractor also				
Task	Assess and secure equipment and supplies needed for emergency	2019			
Sub-Task	Establish contracts with local rental agencies for priority access • May include bypass pumps, generators, other specialized equipment	2019		Finance	
Sub-Task	Purchase supplies, parts, and equipment that should be kept on hand for emergency	2019	Joe Ferris		
Task	Retain mutual aid agreements with partner jurisdictions	2018	Dennis, Farah		Done
	Capital Projects				
Objective 8.	*Complete capital projects that involve minimizing risks and liability*				
Task	Prioritize demolition of the Washington Street property building and paving of gravel area	2019	Brian		Active
Task	Complete demolition of select structures at LOTT's Deschutes Valley property (former brewery property)	2019	Dennis		Active
Sub-Task	Demolish the dilapidated wood shack on the southern portion of the property	2018	Dennis		Done
Sub-Task	Remove other priority structures as identified in 2015 condition assessment memo	2020	Engineering		
Sub-Task	Determine status, risk, and necessary actions for the power sub-station on the Brewery property				
	Staff Support				
Objective 9.	*Support LOTT staff to optimize response during emergency*				
Task	Provide staff with step-by-step instructions for what to do at home immediately after event/earthquake so they will be prepared to get their homes/families safely squared away and quickly report to work		Dennis, Joanne, Safety Committee		

Knowledge Management

LOTT will experience a wave of retirements within the six year planning period, including many highly skilled long-time employees and executive management. To prepare the workforce to manage future challenges, technical and institutional knowledge must be memorialized and shared in a consistent, systematic, and effective manner. LOTT has made significant strides in knowledge management over the last six years, but additional work is needed to document knowledge, ensure critical functions have redundancy, and optimize staff development. High priority activities in this focus area include:

- Complete succession planning for critical positions
- Establish a strategic training program for apprenticeships and Operator advancement
- Complete organizational development work for the Control Systems work group

Knowledge Management Activities:

1. Complete Operations & Maintenance Manuals in a digital format (eO&Ms) and tailored to the end users to ensure easy access to this critical information, meet Ecology's related permit requirements, and use as the foundation for improved quality and consistency of training. *These O&Ms are Operations-focused (as the primary end users), and are not intended as the more Maintenance-focused, manufacturer-provided, repair manuals, though they are linked.*
    - Establish a team to define end use specific needs
    - Establish a lead to take ownership for objective progress
    - Establish a consistent definition and format for O&Ms; consider using platform in SharePoint previously developed
    - Develop a plan for getting eO&Ms done, including an inventory of which are complete, which are needed, order for completion, assignments, and a system for drafting, review, approval, finalizing, and storing completed O&Ms
    - Each O&M will require coming to consensus on how to operate and maintain each part of the plant to ensure consistency
    - Understand how capital projects and related closeout efforts can continue to support this objective
    - O&Ms need to connect through reference tabs to MainSaver, Asset Management, and system/project information like manufacturers' repair manuals, etc.
    - How/who – Lead may be emeritus staff member

2. Complete Standard Operating Procedures (SOPs) in a readily accessible format to ensure easy access to this critical information, meet Ecology's requirement to have a plan for how to run the treatment plant, and to serve as the foundation for improved quality and consistency of training. *These are Operations-focused, living documents, meant to meet end user needs, explaining specific tasks/activities related to larger processes. SOPs may also be needed for other work groups, in particular Maintenance and Control Systems, to more effectively and consistently share knowledge and support training, however, this objective refers to Operations-related procedures.*
    - Establish a team to work on these with a lead who will take ownership and ensure progress

- Establish a consistent definition and format for SOP, including what an SOP should include and how and where they will be stored (template developed)
    - SOPs should include step-by-step instructions for each tasks/procedures related to each part of the treatment plant (for example, there are many SOPs to support the Sludge Dewatering system, such as how to flush out a pump at the end of the day)
    - SOPs needed for some procedural elements, as well as calendar items and equipment/systems
    - SOPs should acknowledge level of flexibility (how strictly they must be followed) and/or a process for ensuring any proposed change from the established SOP be vetted by a team
    - Consider migrating SOPs to a digital platform in SharePoint to improve accessibility
    - Consider short videos of senior Operators explaining how things work
    - Develop a template to ensure SOPs are consistent in format and content
- Complete an inventory of SOPs completed and SOPs needed
- Develop a plan for getting SOPs done, including a system for drafting, review, approval, finalizing, and storing completed SOPs
    - SOPs needed for Operations, Process Control, possibly other areas also
    - Determine order of completion
    - Assign staff with key knowledge to complete various SOPs
    - Consider using the team to review, revise, and finalize SOPs
- Each SOP will require coming to consensus on how to operate each piece of equipment, system, or process
- Develop training plan for ensuring SOPs are understood and consistently applied
- How/who – George as lead

3. Establish consistent and strategic system for improved training related to apprenticeships and Operator advancement using new documentation (eO&Ms, SOPs, MAX guides) as foundation for curriculum.
    - Develop improved and strategic curriculum for both apprenticeship training and Operator advancement
        - eO&Ms, SOPs, and MAX guides all play a role in training to ensure consistent messaging and resolve issues around multiple ways of doing things and confusion over which way is the right way
        - Canvas may play a role in developing a more consistent training curriculum
            - Consider contracting with Green River Community College or SPSCC to develop coursework tailored to LOTT that could be accessible as needed by LOTT trainees through Canvas
    - Develop a clear, consistent, and systematic approach to assigning instruction
        - Shift the responsibility away from the apprentices having to find/select a teacher for each part of the system to pre-assigned instructors
        - Develop a systematic method for matching up senior instructors who hold specialized knowledge with the appropriate subject matter – capture their knowledge/training for future reuse
        - Use Master Instructors as the leads for training apprentices and others
            - This may help relieve the time- and energy-intensive role that currently falls to select senior staff being a constant point of reference for apprentices

- This improved training system is high priority but it is dependent on coming to agreement on operating methodologies, completion of eO&Ms, SOPs, Guides, etc.
- Establish an Operator Advancement program with clear and consistent objectives and processes to encourage Operators to develop areas of specialized knowledge, advance in their expertise, and better meet the needs of the organization.
    - Develop a program framework with established levels of expertise, how to reach each, and corresponding incentives
- How/who – Mark as lead

4. Establish a set of Master Drawings to document key elements of the built environment within all LOTT facilities to capture critical institutional knowledge, improve outcomes for future CIP projects, and respond to emergencies.
    - Senior Operators and other staff hold embedded knowledge about actual conditions in and under facilities that is not captured or documented in a central and systematic way
    - There are 50-100 modifications to facilities each year outside of capital projects that are not captured or documented in a centralized way
    - Establish a definition and format for Master Drawings,
        - Master Drawings should link to eO&Ms and Asset Management system
        - Drawings should include how things are labeled
    - Establish a lead to take ownership for objective progress
    - Establish a team to develop an inventory of Master Drawings needed, LOTT's preference for a comprehensive 3D model of specific areas, and order of priority for completion
    - Develop a plan for completing Master Drawings and keeping them up to date
        - Consider outsourcing initial effort to develop 3D models for each area to be mapped
        - Ensure in-house capability to update 3D models with modifications as they occur to keep the Master Drawings up to date
            - Engineering Tech could serve as primary keeper of drawings and complete most updates
            - Additional staff (Control Systems and Maintenance) would likely also need to update drawings to capture electrical and mechanical modifications as they occur
            - 3D software may need to be purchased, though technology is rapidly evolving and there are cost implications
            - Staff will need to be trained to utilize 3D drawing software/viewer
        - Involve teams of staff in development of each Master Drawing, using opportunity to train/share knowledge with junior Operations staff by having them participate in information gathering from Senior Operations staff
    - How/who – Bill Cawley as lead

5. Complete MAX guides in a readily accessible format to ensure easy access to this critical information, meet Ecology's requirement to have a plan for how to run the treatment plant, and to serve as the foundation for improved quality and consistency of training.
    - This effort is well underway; Borek and Jeff are completing this work; staff time to continue is required

- Need an overall list of guides, check-off completed guides, establish timeline for remaining guides to be completed
- Further development of the Simulator may help in creating a complete set of MAX guides.
- How/who – Borek and Jeff as leads

6. Continue development of the Simulator as a training tool.
    - This effort is linked to a future Master Instructor and is on hold until that happens
    - Taking the Simulator to the next level requires a significant investment in software upgrades and staff time, potentially in two or more significant "lifts"
        - Software update (~$300,000)
        - Biological process layer (~$300,000)
    - Further development of the Simulator is linked to creating a complete set of MAX guides although these two efforts can be accomplished independently
    - Further development of Simulator would allow for running various scenarios to "test" process options, simulate emergency scenarios, and assist with training
    - How/who – Charlie as lead

7. Develop a Process Control Plan and related curriculum to document knowledge of process control processes and procedures, establish connectivity between flow-based operational efforts and process-based efforts, enhance training, and improve consistency.
    - Ensure knowledge sharing to provide backup for Process Control, address the risk of being one deep in a critical position, and prepare for future succession
    - Institutionalize link between operations and process control to manage impacts on both flow and process
    - May include SOPs focused on process for various seasons of year
    - How/who – Terri as lead

8. Use Canvas as a tool to support knowledge sharing and internal training efforts, integrating content in the following areas into on-boarding and training efforts:
    - Safety – Dennis as lead
    - Process Control – Terri as lead
    - Apprenticeship – Mark as lead
    - Operator Advancement – Mark as lead

9. Conduct organizational development work in Control Systems work group to document and share knowledge and ensure adequate backup for critical functions.
    - Build connectivity between Operations and Control Systems, recognizing the increasing reliance of operational processes on control systems
    - Complete SOPs for Control Systems tasks and activities
    - Continue to refine/rebalance workloads to reduce risk and effectively support CIP projects
    - Ensure up-to-date technology to enable remote manipulation

10. Complete succession planning for critical positions to ensure adequate backup and prepare for pending retirements.

- Identify specialized knowledge held by departing senior Operations staff members and develop plan for how to capture, document, share
- Develop a recruitment plan and/or career development path for succession of the Executive Director
- Identify staff members or teams for position backup and ensure comprehensive training to backup and/or succeed Process Control/Environmental Compliance Supervisor and Capital Planning Manager positions

Human Resources

Efforts will continue into the 2019-2024 planning period to develop a comprehensive Human Resources program that effectively supports a knowledgeable and highly skilled workforce. Much progress has been made in recent years, including the establishment of the Human Resources team and development of more consistent and inclusive recruiting, hiring, and on-boarding procedures. High priority activities in this focus area include:

- Complete a staffing and organizational assessment for the Operations work group
- Further develop LOTT's formal Human Resources program
- Continue to evaluate and optimize staffing resources, including establishing back-up staff for critical functions and bringing consultant work in-house where efficiencies can be realized

Human Resources Activities:

1. Further develop LOTT's formal Human Resources program.
    - Assess organizational HR needs and the associated body of work
        - Areas to be considered include Human Resources, Knowledge Management, Succession Planning, Labor, Legal and Risk Management, Safety, Training, Emergency Preparedness, Security, Wellness, and Recognition.
    - Develop a strategy for efficiently and effectively meeting HR needs and functions.
    - Determine the organizational structure and staffing resources necessary to address the body of work and fully support the HR function.
        - Refine the role and structure of the HR team to best support the HR program overall.
        - Evaluate whether the HR and Knowledge Management committee should be combined or if functions should be addressed through resources other than committee structure.
        - The body of work is substantial and there is concern that a single HR committee cannot realistically support it.
    - Provide professional development and support for staff as needed to support the program.
    - Develop a succession plan strategy for eventual retirement of Michael Pendleton (current HR consultant).

2. Refine HR processes, policies, and workflows.
    - Establish consistency in managing HR issues and workflows.
    - Ensure established hiring processes are followed

- Refine on-boarding and orientation processes
    - Evaluate and refine the new process to on-board Operations apprentices with orientation first to Maintenance
    - Establish and follow a clear checklist and workflow for on-boarding tasks
    - Develop an on-boarding and training program for supervisors
- Review and refine administrative policies
    - Hire a legal expert to review administrative policies for compliance with current regulations
    - Conduct internal audits to evaluate compliance with select policies
- Develop a strategic approach to staff training and knowledge development
    - Establish a system for identifying training needs, especially associated with outgoing institutional knowledge
    - Proactively address training needs
- Establish clear and consistent milestones and processes for advancement
    - Operations
    - Control Systems
    - Finance/Accounting
    - Engineering
    - Administrative Specialists 1-4

3. Use tools such as Lanteria and Canvas to improve HR processes and workflows.
    - Use Lanteria to automate and improve HR related processes
        - Travel/training requests
        - PDPs
    - Use Canvas to support internal training efforts
        - Safety
        - Process Control
        - Apprenticeship
        - Operator Advancement
        - Control Systems

4. Complete a staffing and organizational assessment for the Operations work group.
    - Following assessment of viability, implement (if warranted) the transition to a single shift for the Operations work group
    - Complete an evaluation and possible redesign of the Operations work group structure to:
        - Integrate Operations staff into broader organizational efforts
        - Optimize knowledge development and sharing
        - Adapt to increasing focus on control systems
        - Support capital projects

5. Build a strong working relationship with the Union.
    - Establish shared goal of effectively supporting LOTT employees
    - Work to build trust
    - Collaborate on various initiatives
    - Negotiate agreements to the mutual benefit of represented staff and the organization

Information Technology

LOTT will further efforts to assess and improve information technology systems functionality, support, and security. An IT Strategic Plan was developed in 2017 that outlines a number of recommendations toward that end. High priority activities include:

- Conduct a network assessment and a system security assessment
- Complete an IT disaster recovery plan for LOTT's business network
- Complete an assessment of LOTT's current MAX control system
- Address priority needs identified in the system assessments

Information Technology Activities:

1. Conduct a network assessment to highlight areas in need of improvement.
    - Hire a project employee to manage this effort, with goal of completion in 2018.

2. Conduct a security assessment to identify key vulnerabilities and strategies for managing risks.
    - Begin this work upon completion of network assessment, with project employee as lead and goal of completion in 2019.

3. Complete an IT disaster recovery plan to identify procedures to be followed in the event of major disruption to LOTT's IT systems.
    - Begin this work upon completion of security assessment, with the goal of completion in 2020.

4. Work to address the high risks/vulnerabilities identified in the disaster recovery plan and the security and network assessments.
    - Begin this work with the completion of each plan or assessment, as needs and priorities dictate, with highest priority actions for each plan/assessment completed before the end of the 2019-2024 planning period.

5. Adjust and clarify the role of the IT Governance Committee to guide and support the objectives above.
    - Complete this work in by or before 2022
    - This work may include guiding work above and other recommendations of the IT strategic plan, refining the committee's role and membership, clarifying the type of initiatives managed by the committee, establishing consistent processes for bringing IT related initiatives forward, and communicating IT structure and processes clearly to all LOTT staff.

6. Evaluate the need for additional IT support staff, specifically Application Support as recommended in the IT Strategic Plan.

7. Complete an assessment of LOTT's control system to identify how best to ensure continued, reliable function and security.
    - Complete this work before the end of the 2019-2024 planning period.

- This work may include completing a disaster recovery plan for the current MAX system, assessing the adequacy, reliability, and security of the control system, migrating IT and control systems assets into LOTT's asset management system, and developing recommendations for future update or replacement of the control system.

Capital Planning Process

LOTT develops and refines its Capital Improvements Plan to support the intent of the Wastewater Resource Management Plan and meet the requirements of EPA's Capacity, Management, Operation, and Maintenance Performance Program and NPDES permit requirements. The CIP is data-driven and capitalizes on the knowledge of the Capital Management Group and information from LOTT's Master Plan, annual Capacity Assessments, the Asset Management Program, LOTT's financial and capital planning tool (the Wizard), and a new staffing model. The capital planning process has been designed to prioritize projects and identify required resources, including funding, staffing, and consultant support. Activities to further refine the process include:

- Refine and update the new staffing model as a tool for projecting CIP related staffing requirements
- Harness MainSaver data to prioritize asset management CIP projects

Capital Planning Process Activities:

1. Update the Capital Improvements Plan Development Procedures memorandum each biennium to document changes based on the evolving process; the initial update should include:
   - Role of the new Capital Management Group
   - Revised role of the Capital Projects Planning Process (CP3) team
   - Removal/revision of the prioritization matrix
   - Discussion of the qualitative/organic nature of project development
   - Recognition that identification of necessary projects is the responsibility of all; it has become part of the culture and an expectation that staff bring needed projects to the attention of the organization
   - Projects are identified through discussions/reviews at all levels: CP3, Asset Management team, CMG, project teams, consultants, SLT, all staff

2. Build and refine a tool that links data from timesheets, CIP database, Wizard, and Microsoft Project to forecast CIP staffing requirements.
   - Update the tool annually based on new data
   - Focus on staffing implications primarily for Engineering, Control Systems, and Operations workgroups
   - Use projections to adjust staffing resources and/or timing of projects

3. Develop a process for an annual review of MainSaver data to identify potential CIP projects.
   - Assign the Asset Management Core Team to this annual task
   - Recognize that asset management data does not automatically fold into the CIP, but must be mined in order to inform decisions

- Include in the process safeguards to prioritize projects to avoid close calls/equipment failures/obsolescence
- Complete initial system evaluations for all existing systems by end of 2018 and for new capital projects at the time of their completion
- Integrate continuous updating of system evaluations into the routine course of business
- Audit evaluations at least once every six years to ensure asset conditions are accurate

4. Establish and document the key steps and roles and responsibilities for developing a CIP project.
    - Build on the steps outlined in the Project Management 66 steps document
    - Recognize that project development is rarely linear and each project is unique

5. Identify an in-house or external person to train as a back-up and potential successor for Tyle's position; develop a knowledge sharing/training plan by 2020; complete training by 2022.

Planning for Emerging Issues

Within the next six years, LOTT anticipates being affected by emerging issues such as changing regulatory requirements, environmental conditions, and community needs.

- The Department of Ecology's Total Maximum Daily Load (TMDL) Study will result in waste load allocations that require a reduction in nutrient loading from the Budd Inlet Treatment Plant, Capitol Lake, non-point sources, and sources to the north of Budd Inlet.
- Sea level rise and associated flooding will increasingly affect downtown Olympia and the Port Peninsula where the Budd Inlet Treatment Plant is located, potentially flooding the plant site and overwhelming the plant's hydraulic capacity and upsetting biological treatment processes.
- LOTT's Reclaimed Water Infiltration Study will be completed in 2020. The study addresses community questions about residual chemicals that may remain in the reclaimed water after treatment. Results of the study could have a significant impact on LOTT's long-range plan for managing wastewater.
- Washington State's new Reclaimed Water Rule (chapter 90.46 RCW) became effective February 23, 2018. The new rule clarifies that reclaimed water is a valuable resource and it is not considered wastewater. The rule also provides for a new class of reclaimed water designated as Class A+, which could open the door to demonstration projects for direct potable reuse.
- LOTT's partner jurisdictions are working closely with public, private, and non-profit organizations to address a regional shortage in affordable housing. Many factors add to the cost of residential development, including utility connection fees for water and wastewater service.

For each of these issues, there are multiple options for how to respond and/or address the issue. In each case, there is not yet a clear and defined best path forward. Many of the activities related to planning for emerging issues involve continued information gathering and assessment of options. High priority activities to respond to the issues above include:

- Complete a master planning effort in two phases: the first to establish a long-range plan for the Budd Inlet Treatment Plant and the second to update LOTT's plan for overall system capacity through expansion of reclaimed water production, conveyance, and disposition
- Develop step-by-step procedures in coordination with the City of Olympia for responding to surface flooding that could convey floodwaters into the combined storm/sewer system

- Establish LOTT's baseline energy usage and greenhouse gas emissions for use in tracking future reductions
- Encourage community conversations on results of the Reclaimed Water Infiltration Study, future levels of treatment and uses of reclaimed water, and broader water management issues
- Reassess and adjust monthly service fees and connection fees for both residential and commercial customers as a result of the cost of service study findings, and propose associated updates to LOTT's Intergovernmental Agreement

The section that follows includes a brief discussion of each emerging issue, and a list of various options or strategies for responding to the issue. Specific actions that may be taken within the planning period are also identified. The intent is not that all of these actions be taken, but that potential actions be identified and pursued as needed to ensure that LOTT remains well-informed and well-positioned to effectively respond to the issue in the future. At the end of this section, there are a series of tables that list existing information – memos and reports – related to each issue. The intent is to treat the tables as a work in progress, continually adding resources to the inventory of existing information as additional technical memos and reports become available.

Total Maximum Daily Load Study (TMDL) by Department of Ecology

The TMDL will result in waste load allocations that require a reduction in nutrient loading from the Budd Inlet Treatment Plant, Capitol Lake, non-point sources, and sources to the north of Budd Inlet. The NPDES discharge permit for the Budd Inlet Treatment Plant will be reopened upon completion of the TMDL, and discharge limits for Total Inorganic Nitrogen (TIN) and Biochemical Oxygen Demand (BOD) will be reduced. LOTT may be able to meet the reductions initially through treatment plant performance, however, LOTT will not be able to meet the reduced discharge limits as wastewater flows increase over time from our growing communities. Alternatives for meeting reduced permit limits include expansion of reclaimed water production, expansion of reclaimed water reuse and/or infiltration, or credit for alternative actions that result in reduced nutrient loading within the watershed.

Options/Strategies for Responding to TMDL:

- Expand reclaimed water capacity throughout the system
- Expand reclaimed water production at Budd Inlet Treatment Plant
- Convey reclaimed water produced at BITP to Martin Way/Hawks Prairie
- Develop the Henderson N site for reclaimed water infiltration
- Facilitate additional reclaimed water reuse in the summer months
- Consider alternative infiltration sites that may have greater capacity and/or multiple benefits such as wetland or streamflow augmentation and/or water rights mitigation for partner jurisdictions
- Develop the Deschutes Valley property for reclaimed water production and/or an advanced treatment facility
- Gain nutrient reduction credit through conversion of septic systems to sewer
- Gain nutrient reduction credit through conservation easements/acquisitions
- Gain nutrient reduction credit through alternative actions
- Facilitate progress toward long-term management decisions for Capitol Lake that address nutrient loading from lake

Potential TMDL Activities:

1. Complete a BITP site plan/master plan to consider options for siting future processes and to inform need to acquire additional nearby property

2. Pursue acquisition of property adjacent to BITP as needed

3. Update analysis of alternatives for system-wide expansion of reclaimed water capacity by 2024

4. Consider acquisition of additional property near Henderson N site if capacity assessment indicates benefit

5. Complete a next level assessment of specific alternative infiltration sites or target areas as needed

6. Pursue acquisition of alternative site(s) for future infiltration as needed

7. Work with partner jurisdictions to identify and develop reuse to divert flow from discharge to Budd Inlet in the permit limit season

8. Identify and complete high priority site improvement actions at the Deschutes Valley property by 2024 to reduce liability

9. Explore sites alternative to Deschutes Valley property for future facilities

10. Pursue Deschutes Valley property surplus and/or acquisition of alternative sites as needed

11. Complete an assessment to quantify potential nutrient reduction benefit/credit from septic conversion program, using work done by City of Spokane/Spokane County as a model

12. Complete an assessment to quantify nutrient reduction benefit/credit from past and potential conservation easements/acquisitions

13. Explore potential nutrient reduction benefit/credit from alternative actions such as shellfish “farming”, boat waste dump station, or other projects

14. Encourage resolution of lake management question to reduce future level of uncertainty by supporting completion of the EIS

15. Provide reclaimed water for future Capitol Lake water feature as requested

16. Play an active role in resolving Capitol Lake management issues as requested

Sea Level Rise (SLR)

Sea level rise and associated flooding will affect downtown Olympia and the Port Peninsula where the Budd Inlet Treatment Plant is located. High tides and storm surge in Budd Inlet could flood downtown Olympia and increase the volume of water conveyed to the BITP by the combined sewer system. Under current conditions, flooding of low-lying catch basins from a 100-year storm tide could send 1.8 million gallons of stormwater to the BITP from the combined sewer system. With 6 inches of sea level rise, a 100-year storm tide would flood 153 catch basins, potentially adding 9.8 million gallons of stormwater to the combined sewer system and overwhelming the hydraulic capacity of the treatment plant. Sea

level rise will raise water levels in Budd Inlet, which in turn would require more frequent pumping against higher water levels to discharge treated wastewater through LOTT's marine outfalls. The effluent pump station capacity may experience a decrease of 1 million gallon per day (MGD) for each 3 feet of sea level rise. Overland flooding of the BITP could also damage facilities and interrupt operations. Areas of the BITP most at risk include headworks, effluent pump station, and the PSE Thurston substation. LOTT has participated in regional planning related to sea level rise, conducted an initial assessment of vulnerabilities, and developed a response plan for high flow events. Objectives for the planning period include building on these efforts to identify near-term and long-term actions and projects to ensure critical infrastructure is protected and LOTT's ability to meet its mission is not compromised.

Options/Strategies for Responding to SLR:

- Assess vulnerabilities of the BITP to identify projects and actions needed to minimize impacts of sea level rise
- Establish design standards for new facilities at the BITP to minimize impacts of sea level rise
- Assess options for increasing flow equalization storage for high flow events
- Assess options for reducing peak flows
- Assess options for reducing the extent of the combined sewer system by separating stormwater conveyance from the sewer system
- Participate in regional sea level rise response planning
- Prepare for near-term flooding risk at Budd Inlet Treatment Plant
- Establish standard operating procedures to response to high flow events
- Revisit and adjust high flow standard operating procedures based on changing conditions
- Analyze feasibility of abandoning the existing Budd Inlet Treatment Plant and relocating it to a site not subject to sea level rise

Potential SLR Activities:

1. Complete more detailed assessments as needed to further define SLR related CIP projects, building on 2014 Vulnerability Assessment, 2018 Assessment, and the 2018 Sea Level Rise Response Plan

2. Identify near-term SLR actions and incorporate into long-term CIP

3. Document design standards for new facilities at the BITP to minimize impacts of sea level rise and refine standards based on changes in projections

4. Explore use of former first anoxic area for additional 2 mg of equalization storage

5. Explore increasing influent pipe size and influent pumping capacity to accommodate increased peak flows

6. Work with City of Olympia, Port of Olympia and other stakeholders to further develop long-term funding strategies for sea level rise response actions

7. Develop step-by-step plan for responding to imminent surface flooding (where to sandbag first, next, etc.) and secure necessary supplies to ensure readiness

8. Adjust SOPs for high flow events as needed based on changing weather patterns and sea level rise projections

Reclaimed Water Infiltration Study (RWIS)

LOTT is conducting a multi-year study to address community questions about potential risks from infiltrating reclaimed water to groundwater because of chemicals that may remain in the reclaimed water after treatment. The focus of the study are residual chemicals, such as those from soaps, shampoos, household cleaners, medicines, and cosmetics, and their fate following treatment and infiltration. The study is made up of four main tasks. Water quality will be characterized by testing groundwater, surface water, wastewater, and reclaimed water in the Hawks Prairie and Tumwater study areas for residual chemicals. Treatment effectiveness will be evaluated by analyzing where reclaimed water infiltrated at the Hawks Prairie site travels subsurface, how quickly the water travels, and how the water quality changes over time. Risks will be assessed by evaluating potential impacts to people and the environment from residual chemicals of concern and a cost/benefit analysis will be completed to consider long-term various options for managing reclaimed water, including levels of treatment and alternative uses of the water. The study will encourage community conversations about these issues. Ultimately, the study results will inform regulatory decisions, including updates to Thurston County's Critical Areas Ordinance that addresses infiltration of reclaimed water within Critical Aquifer Recharge Areas. Results of the study could have a significant impact on LOTT's long-range plan for managing wastewater.

Options/Strategies Related to RWIS:

- Assess potential risks of using reclaimed water for groundwater recharge due to residual chemicals that may be present in reclaimed water
- Evaluate costs of treating reclaimed water to potable standards
- Inform updates to Thurston County Critical Areas Ordinance related to reclaimed water uses in Critical Aquifer Recharge Areas
- Explore alternative uses of reclaimed water

Potential RWIS Activities:

1. Complete the Reclaimed Water Infiltration Study

2. Encourage community conversations on broader water management issues and links to other planning efforts as part of study

3. Further develop role as industry leader by continuing to share results through industry conferences and journals

4. Develop options and costs of alternative reclaimed water treatment levels as part of study

5. Provide information and briefings on study results to assist the County in updates to the Critical Aquifer Recharge Areas ordinance

6. Work with jurisdictional partners to explore options for reclaimed water reuse

State Reclaimed Water Rule (RW Rule)

The Department of Ecology adopted chapter 173-219 WAC Reclaimed Water on January 23, 2018 as directed by chapter 90.46.RCW. This chapter became effective February 23, 2018. The new rule clarifies that reclaimed water is a valuable resource and it is not considered wastewater. The rule also provides for a new class of reclaimed water designated as Class A+, which may be approved for direct potable reuse on a case-by-case basis.

Options/Strategies related to RW Rule:

- Participate as an active member of the Rule-making advisory committee as guidance for the Rule is developed
- Ensure compliance with new Rule and guidance provisions
- Advance community discussion of alternative levels of treatment and uses of reclaimed water

Potential RW Rule Activities:

1. Continue participation by serving on the technical advisory committee for review and revision to state reclaimed water guidance – the Purple Book

2. Complete a study to verify effectiveness of the new ultraviolet disinfection system at the Budd Inlet Treatment Plant and submit to Ecology for review

3. Consider a demonstration project to brew beer with purified water

Cost of Service Study Follow-up

LOTT conducted a cost of service study in 2017 and determined that adjustments to monthly service fees and connection fees are warranted. The basis of these fees – the Equivalent Residential Unit or ERU – is antiquated and problematic. Adjustment of the fees will require careful coordination with LOTT's partner jurisdictions, who provide billing services on behalf of LOTT. The adjustments will also require associated updates to LOTT's Intergovernmental Agreement, and those changes must be approved by each of LOTT's partner jurisdiction councils and commission. At the same time, LOTT's partner jurisdictions are exploring options for better managing the costs of residential development, in an effort to address the local housing shortage. There may be opportunity to coordinate these efforts.

Potential Cost of Service Follow-Up Activities:

1. Reassess and adjust monthly service fees and connection fees for both residential and commercial customers as a result of the cost of service study findings
2. Coordinate proposed changes with partner jurisdiction Finance and Community Development staff
3. Propose associated updates to LOTT's Intergovernmental Agreement

Existing Information Related to Emerging Issues

Options	Completed Actions/Existing Information
TMDL	
Expand reclaimed water capacity throughout the system	Reclaimed Water Production, Conveyance, and Recharge Alternatives: Update 2016
Expand reclaimed water production at Budd Inlet Treatment Plant	Reclaimed Water Technologies Business Case Evaluation: BITP 2015 Pilot Test Results: Synthetic Compressible Media Filter 2016
Convey reclaimed water produced at BITP to Martin Way/Hawks Prairie	Pipeline Feasibility Study: Various Alternatives 2017
Develop the Henderson N site for reclaimed water infiltration	Capacity assessment underway
Consider alternative infiltration sites that may have greater capacity and/or multiple benefits	Assessment of Tumwater area underway
Develop the Deschutes Valley property for reclaimed water production and/or an advanced treatment facility	Phase 1 Deschutes Valley Property Master Plan: Hydraulic Modeling Interim Project Summary 2016 Phase 1 Deschutes Valley Property Master Plan: Condition Assessment Summary and Prioritization 2016
Gain nutrient reduction credit through conversion of septic systems to sewer	Pilot septic conversion rebate program underway Nutrient offset analysis underway
Gain nutrient reduction credit through conservation easements/acquisitions	Gull Harbor and Lonseth property acquisitions completed 2006 and 2011 in partnership with Capitol Land Trust Nutrient offset analysis underway

Options	Completed Actions/Existing Information
Sea Level Rise	
Abandon the existing Budd Inlet Treatment Plant and relocate it to a site not subject to sea level rise	Budd Inlet Treatment Plant Relocation: Cost Estimate 2016
Assess vulnerabilities of the BITP to identify projects and actions needed to minimize impacts of sea level rise	Budd Inlet Treatment Plant Vulnerability Assessment: Part 1 2014 Department of Homeland Security Vulnerability Assessment scheduled for March 2018
Assess options for increasing flow equalization storage for high flow events	EQ Basin Cost and Feasibility Assessment 2014
Assess options for reducing peak flows	Peak Flow Reduction Evaluation 2015
Assess options for reducing the extent of the combined sewer system by separating stormwater conveyance from the sewer system	Peak Flow Reduction Evaluation 2015
Participate in regional sea level rise response planning	Joint planning with city and port underway
Establish standard operating procedures to response to high flow events	High Flow Event SOPs 2016

Options	Completed Actions/Existing Information
Reclaimed Water Infiltration Study	
Assess potential risks of using reclaimed water for groundwater recharge due to residual chemicals that may be present in reclaimed water	Reclaimed Water Infiltration Study underway, with completion expected in 2019 Task 1: Water Quality Characterization summary
Evaluate costs of treating reclaimed water to higher/potable standards	Cost of Adding Advanced Treatment (Reverse Osmosis) 2012
Inform updates to Thurston County Critical Areas Ordinance related to reclaimed water uses in Critical Aquifer Recharge Areas	
Explore alternative uses of reclaimed water	Capitol Campus Reclaimed Water Assessment 2016 Reclaimed Water Supply and Demand Analysis Update 2015

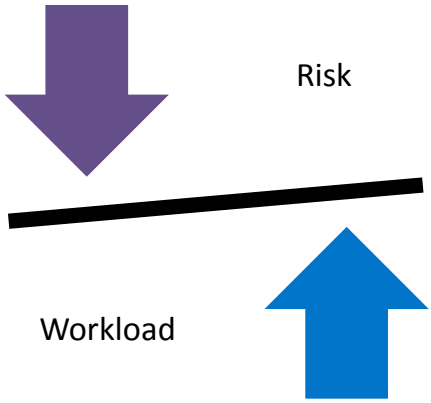
Options	Completed Actions/Existing Information
State Reclaimed Water Rule	
Participate as an active member of the Rule-making advisory committee	Adopted Reclaimed Water Rule Concise Fact Sheet on new Rule

Options	Completed Actions/Existing Information
Cost of Service Study Follow-Up	
Reassess and adjust monthly service fees and connection fees for both residential and commercial customers	Cost of Service Technical Memorandum 2017

Resources for Implementation

The 2019-2024 Strategic Plan is intended to improve LOTT's ability to manage risk and to further optimize LOTT's resources – people, assets, processes, and dollars. Inherent in managing risk is capital planning to identify projects necessary to sustain LOTT's existing infrastructure and to accommodate system growth. Completion of the capital plan, day-to-day operations, and LOTT's ambitious internal work plan all require resources – both human and financial. This planning process included development of a six year Capital Improvements Plan, a finance plan, and a staffing plan. Details of the Capital Improvements Plan and the finance plan are included in the 2019-2020 Budget and Capital Improvements Plan, which is a separate document.

LOTT conducted an assessment of staffing needs in preparation of this plan. The effort involved discussions with management, team meetings, and analysis of data from many sources, including a new staffing tool that forecasts staffing needs in various work groups based on data from timesheets, project management processes, and the CIP. The result was identification of 15 or more positions that may be needed over the six year planning period. Seven of those positions are near-term needs that were fully vetted and incorporated into the 2019-2020 budget. Eight additional positions were identified for consideration later in the planning period when more information is available.



New Positions for 2019-2020 Biennium

Position	Function	Timeline
Instrumentation & Electrical Project Specialist	• CIP project support • Design review, as-builts, O&Ms • I&E project coordination	2019
Project Engineer	• Project coordination • Collection System & small projects • Support for Project Managers	2019
Maintenance Worker	• General maintenance and grounds keeping	2019
Security Officer	• Overnight security coverage • Support for on-call Operators	2019
Administrative Specialist I	• Front-line customer service • Administrative support	2020
Totals		**5 FTEs**

Conversion of Existing Temporary Positions for 2019-2020 Biennium

Existing Position Conversions	Function	Timeline
Environmental Educator I	• Backup for critical position • High profile public program	2020
Environmental Project Manager	• Project coordination • Study follow-up • In-house SEPA evaluations	2021
Totals		**2 FTEs**

Positions for Consideration within 2021-2024 Timeframe

Other staffing needs were identified as likely needs within the six year planning period. However, more information is needed to fully vet these potential positions. The staffing impact of organizational development efforts currently underway, such as the move from two Operations shifts to one shift, is not yet fully understood. Similarly, staffing impacts from upcoming capital projects, like the Biological Process Improvements project, are not yet understood. Several of the anticipated staffing needs will temporarily be filled through consultant support. More time is needed to develop a better understanding of how all these factors affect future staffing needs. As data is gathered and these new dynamics come into play, how best to optimize staffing resources will be reconsidered.

Potential Positions	Function	Timeline
Control Systems Technician	• Back-up for existing Tech • Many control systems assets • CIP project support	2021
Construction Inspector – CM I	• Construction field inspection • Construction Manager support	2022
IT Support Specialist	• Applications management for growing software inventory • General IT system support	2022
Operator (one or more)	• Risk management • CIP project support • Succession planning	2022
Environmental Specialist	• Proactive FOG program • Source control outreach	2023
Capital Planning Specialist	• Backup for critical position • In-house capacity assessment • Business case evaluations	2024
Totals		**6 or more**

Conclusion

This Internal Work Plan will be used as a tool to focus staff on essential work for the 2019-2024 planning period. LOTT staff must first and foremost meet their mission of effectively treating our communities' wastewater, however, it will be important that staff resources also be dedicated to completing at a minimum, the highest priority activities identified in this work plan. These actions will ensure that LOTT continues to successfully adapt to the significant changes anticipated over the next few years.

Appendix A

Guiding Goals and Principles

This plan renews LOTT's overarching goals and principles for each of four key management areas – Utility Management; Treatment and Capacity; Community Engagement; and Workplace Environment – that were identified in previous rounds of strategic planning. They are included here as context for the 2019-2020 Strategic Plan.

Utility Management

Utility management addresses how LOTT manages finances, sustains existing systems, and builds to accommodate the future.

As a public, nonprofit organization charged with providing an essential public service, LOTT must manage funds efficiently and responsibly. LOTT patterns its utility management on a private sector model, striving for "true cost accounting" to ensure accurate management and distribution of costs, with checks and balances that offer transparent accountability. LOTT must sustain our communities' significant investment in critical existing infrastructure. LOTT is also charged with meeting our communities' future wastewater management needs, and strives to plan for and build new capacity projects in ways that are responsible and responsive to our communities.

Manage Finances

LOTT strives to assure efficient and responsible financial management while fulfilling the intent of LOTT's governing interlocal agreement and complying with Washington State law. Success in this area requires involvement and support from all staff members, as well as the Board of Directors.

Goal 1: Plan and manage the utility within financial benchmarks

Goal 2: Ensure equitable distribution of costs between ratepayers and new development

Goal 3: Operate within accepted business and financial standards

Sustain Existing Systems

LOTT owns and maintains facilities, infrastructure, and equipment valued at an estimated replacement value of approximately $750 million. To sustain this significant community investment, we have developed an Asset Management Program. The program guides the acquisition, use, repair, and replacement of assets to optimize their use and function, and minimize costs over the asset's life.

Goal 4: Embrace asset management and use of the triple bottom line (economic, environmental, and social considerations) as the operational standard for all system investment

Build to Accommodate the Future

LOTT's long-range plan includes a "just in time," incremental approach to building new system capacity. This unique approach requires constant planning and completion of capital projects, ongoing analyses to identify efficiencies and cost savings, and careful attention to potential project impacts and public input.

It also requires a team approach with broad staff involvement to ensure that projects are designed, built, and commissioned to function effectively and efficiently.

Goal 5: Complete capital projects in a responsible, efficient, effective, and responsive manner

Goal 6: Successfully deliver projects by achieving project objectives with input and support from key work groups across the organization

Treatment and Capacity

LOTT's primary function – treating wastewater – is directly linked to environmental protection and stewardship.

LOTT weaves environmental stewardship into every aspect of wastewater treatment, providing effective treatment to protect water quality in Budd Inlet and other receiving waters, producing renewable resources like reclaimed water, and working to minimize impacts to neighbors and the environment. At the same time, LOTT meets the communities' changing needs for capacity related not only to wastewater treatment, but also to reclaimed water production, conveyance of wastewater and reclaimed water, and discharge of treated waters to the environment. These challenges require making optimal use of existing capacity, as well as continual planning and development of new capacity to meet needs "just in time."

Treat Wastewater

LOTT strives to not only meet all permit requirements, but to treat water to an even higher quality. At the same time, wastewater treatment processes provide the opportunity to produce and use a variety of renewable resources.

Goal 1: Protect water resources through high quality wastewater treatment

Goal 2: Manage and utilize wastewater as a source of renewable resources

Goal 3: Operate facilities in a manner that balances environmental, social, and economic considerations

Goal 4: Operate as a good neighbor to minimize impacts

Manage Capacity

In addition to treating wastewater, LOTT must manage system capacity to accommodate fluctuations in flows. Capacity refers not only to wastewater, but also to reclaimed water, and not only to treatment capacity, but also to conveyance and discharge capacity. LOTT must be responsive not only to short-term flow fluctuations from storm events, but also to long-term fluctuations from community growth.

Goal 5: Maximize utilization of existing treatment capacity

Goal 6: Optimize flow and loading reductions to minimize need for additional capacity

Goal 7: Build capital facilities "just in time"

Goal 8: Collaborate at the leadership level to advance responsible utility management and environmental stewardship

Community Engagement

Community engagement refers to a two-way flow of information and ideas, involving LOTT, ratepayers, members of the public, community groups, partner organizations, staff members, and industry peers.

At LOTT, we routinely share information about our projects, plans, and programs with the community, and we place equal importance on receiving information and feedback from community members. We have a strong commitment to public education, offering tools like the WET Science Center and the East Bay Public Plaza to improve public understanding of LOTT's role in our communities. A proactive approach to public involvement allows us to keep the community informed of current and upcoming plans, projects, and programs and to gain vital feedback.

Educate the Public

Public education raises awareness about LOTT's mission and activities, and plays a key role in encouraging the public to take actions, such as source control, which helps us meet our mission. Key educational themes include wastewater treatment, reclaimed water, the water/energy connection, water conservation, pretreatment, and career opportunities.

Goal 1: Develop innovative and engaging educational programs that foster public awareness and support for LOTT's mission

Goal 2: Focus educational investments on key messages and audiences in an effort to judiciously utilize ratepayer dollars

Interact with the Community

LOTT is committed to productive, proactive public involvement. This effort begins with open communication, transparency, and easy access to information. We encourage public input by providing opportunities to engage community members and elicit their feedback and then work to close the loop, incorporating public input into LOTT operations, plans, and projects.

Goal 3: Build public trust by providing open, transparent, and effective access to information

Goal 4: Develop public trust by seeking and incorporating public feedback into LOTT plans and activities

Goal 5: Share knowledge, expertise, and a commitment to excellence with industry peers as a means of staff development and environmental stewardship

Workplace Environment

The complex and technical nature of wastewater management requires a diverse, dedicated, and well-trained workforce and a healthy and productive workplace to meet LOTT's goals and challenges.

LOTT recognizes that the workforce is essential to the success of their mission and spends a great deal of effort to recruit, develop, and retain quality employees. A culture of safety is integral to LOTT's work, and LOTT employees work to ensure the safety and security of their coworkers, the public, and the communities' overall investment in LOTT facilities and infrastructure. As the provider of an essential public service, LOTT also places an emphasis on emergency preparedness, planning, and training to respond effectively to emergency situations.

Manage the Workforce

The complex and technical nature of wastewater management requires a diverse, dedicated, and well-trained workforce, and a healthy and productive workplace, to meet LOTT's goals and challenges. Focus on innovation, professional development, and employee wellness help us remain a workplace of choice.

Goal 1: Maintain status as a workplace-of-choice to recruit and retain a well-qualified, diverse, satisfied workforce

Goal 2: Provide employee development and support programs that result in an adaptive, efficient, satisfied, and skilled workforce

Goal 3: Be an industry leader by cultivating excellence, innovation, mentoring, and knowledge sharing

Maintain Safety

Safety is important not only in LOTT's highly industrial facilities, but in all aspects of LOTT's work. Protecting the safety of our employees, the public, and contractors is a top priority. This focus on safety also protects the communities' substantial investments in LOTT facilities.

Goal 4: Build and maintain a culture of safety and security

Goal 5: Promote health and wellness of employees as integral to worker safety and productivity

Emergency Preparedness

LOTT provides an essential public service to our communities and must be fully prepared to respond to emergency situations. Emergencies can be natural or human-made, and may include natural disasters, power outages, epidemics, and other urgent or unexpected scenarios that impact LOTT's communities.

Goal 6: Develop and implement a comprehensive emergency preparedness program to protect people, the environment, and infrastructure

Appendix B

Internal Performance Measures

The tables that follow include metrics that are tracked internally to gauge progress in meeting LOTT's overarching goals and objectives. These tables are based on the performance report cards used during the 2013-2018 planning period. They have been refined to reflect LOTT's 2019-2024 performance objectives.

Utility Management		
Goal	**Objective**	**Example Measure**
Plan and manage the utility within financial benchmarks	Manage finances so that expenses do not exceed annual adopted budget	Budgeted dollars = $31,000,000 Actual expenditures = $29,000,000
	Maintain cash reserves at greater than or equal to 6 months of average operating expenses and $3 million for emergency capital expenditures	Cash reserves > 6 months operating expenses Emergency reserves = $3 million
Ensure equitable distribution of costs between ratepayers and new development	Evaluate all capital projects to determine proportions that represent new capacity versus improvements of the existing system	Yes
Operate within accepted business and financial standards	Achieve an annual state audit that is free of findings related to the accuracy of financial controls and disclosures	Audit free of findings
	Earn the Comprehensive Annual Financial Report award annually	Awarded for fiscal year 2016
Embrace asset management and use of the triple bottom line (economic, environmental, and social considerations) as the operational standard for all system investment	Implement a comprehensive asset management program and harness data from that effort to inform development of LOTT's capital improvements plans	Yes
Complete capital projects in a responsible, efficient, effective, and responsive manner	Comply with requirements relating to capital project environmental evaluations, permitting, and public involvement	Yes
Successfully deliver projects by achieving project objectives with input and support from key work groups across the organization	Use project team framework for planning, design, construction, and close-out of capital projects	Yes

Treatment and Capacity		
Goal	**Objective**	**Example Measure**
Protect water resources through high quality wastewater treatment	Achieve at least 99% permit compliance	Budd Inlet Plant compliance = 100% Martin Way Plant compliance = 100%
Manage and utilize wastewater as a source of renewable resources	Track production of Class A Reclaimed Water by volume and annual percentage of overall wastewater flows	Reclaimed water = 1,271,952 gallons per day Proportion of overall flow = 8.7%
	Track production of Class B biosolids by weight and percentage of beneficial reuse	Biosolids = 9,000 wet tons Beneficial reuse = 100%
	Track biogas capture and energy production	Methane and biogas reuse = 96% Kilowatts generated = 2,012,469 Energy savings= $144,898
Operate facilities in a manner that balances environmental, social, and economic considerations	Continue to identify and complete energy-saving projects	Completed several energy-saving projects, including installation of about 500 LED light fixtures and bulbs
	Avoid combined sewer overflows (CSOs) into Budd Inlet, with no more than one occurring annually	Combined sewer overflows = 0
	Avoid releases of partially treated wastewater into Budd Inlet, with no more than one occurring annually	Releases of partially treated wastewater = 0
Operate as a good neighbor to minimize impacts	Achieve 100% annual compliance with ORCAA permit requirements	ORCAA Compliance = 100%
	Receive 5 or fewer odor complaints per year	Odor complaints = 0
Maximize utilization of existing treatment capacity	Achieve permit discharge limit of 288 pounds per day or less for total inorganic nitrogen (TIN) during limiting season (April-October)	TIN average = 179 pounds per day
	Achieve permit discharge limit of 671 pounds per day or less for biochemical oxygen demand (BOD) during limiting season (April-October)	BOD average = 330 pounds per day
Optimize flow reduction to minimize need for additional capacity	Achieve additional flow reduction of at least 120,000 gallons per day by 2024	Annual flow reduction for 2017 = 34,406 gallons per day Cumulative reduction 2013-2018 = 199,205 gallons per day
Build capital facilities “just in time”	Maintain annual average reserve capacity of 1.5 million gallons per day	Maintained annual average of 1.5 million gallons per day
Collaborate at the leadership level to advance responsible utility management and environmental stewardship	Report on Board-directed policy initiatives acted upon each year	Acted on several Board-directed initiatives

Community Engagement		
Goal	**Objective**	**Example Measure**
Develop innovative and engaging educational programs that foster public awareness and support for LOTT's mission	Track and report total WET Center visits per year	Total visits = 17,821
	Track and report general WET Center visitor (walk-in) attendance	Total walk-in visits = 12,519
	Track and report participation in tours of LOTT facilities	Tour participants = 1,025
Focus educational investments on key messages and audiences in an effort to judiciously utilize ratepayer dollars	Maintain formal partnerships with three local school districts to host student field trips as part of their science curriculum	North Thurston students = 910 Olympia students = 390 Tumwater students = 376 Additional students = 1,309
Build public trust by providing open, transparent, and effective access to information	Implement proactive communication plans for every major project and for issues that have significant public impact	Yes
	Continue to provide website access to a video record of LOTT Board meetings	Yes
	Provide initial response for all public records requests within 5 business days	Records requests = 17 Initial response in 5 business days = 100%
Develop public trust by proactively seeking and incorporating public feedback into LOTT plans and activities	Offer a variety of opportunities for gathering public feedback at any one time	Yes
Share knowledge, expertise, and a commitment to excellence with industry peers as a means of staff development and environmental stewardship	Meet with utility or industry peers to share ideas, experiences, and expertise as appropriate	Peer meetings = 16

Workplace Environment		
Goal	**Objective**	**Example Measure**
Maintain status as a workplace-of-choice to recruit and retain a well-qualified, diverse, satisfied workforce	Maintain an environment in which no more than 4% of staff voluntarily leave for similar work opportunities annually	Voluntary exits = 0.01%
Provide employee development and support programs that result in an adaptive, efficient, satisfied, and skilled workforce	Track apprenticeship progress toward journey-level status	Apprenticeships underway = 2 Apprenticeships completed = 2 Apprenticeships on track for completion = 2
	Provide a variety of professional development opportunities, including an active Career Development Program	Yes CDPs underway = 3 CDPs completed = 0
Be an industry leader by cultivating excellence, innovation, mentoring, and knowledge sharing.	Continue to develop back-up and/or succession plans for critical functions	Established a career development plan as part of succession plan for Control Systems Specialist
Build and maintain a culture of safety and security	Track and report monthly worker hours lost due to injury	Time loss = 0
	Track and report safety incidents to the Board monthly	Safety incidents = 25
	Achieve an L&I experience rating at or below industry base rate of 1.0	Experience rating = 0.6777
Promote health and wellness of employees as integral to worker safety and productivity	Earn the WellCity award annually	WellCity award earned
Develop and implement a comprehensive emergency preparedness program to protect people, the environment, and infrastructure	Develop response plans for various emergency scenarios by 2024	Established high flow event standard operating procedures
	Participate in interjurisdictional emergency preparedness training and drills as appropriate	Joint training = 1
	Hold LOTT-specific emergency preparedness training and drills as appropriate	LOTT training = 2