

BEFORE THE  
WASHINGTON UTILITIES & TRANSPORTATION COMMISSION

UW-240151

CASCADIA WATER, LLC

January 13, 2025

**Direct Exhibit of Matthew J. Rowell and Culley J. Lehman**

**SOUTH WHIDBEY FIRE/EMS (“SWFE”) FIRE HYDRANT LETTER**

**Exh. MJR-CJL-3**



## **SOUTH WHIDBEY FIRE / EMS**

**5579 Bayview Road • Langley, WA 98260**

**(360) 321-1533 • Fax (360) 321-9385 • [www.swfe.org](http://www.swfe.org)**

January 6, 2025

Culley Lehman  
Cascadia Water  
PO Box 549  
Freeland, WA 98249

RE: Fire hydrants

Dear Mr. Lehman,

Fire hydrants are an essential component to providing adequate fire protection for the residents of South Whidbey Island for several reasons.

For one, while in our six stations we have six pumpers carrying 750 to 1000 gallons, and five water tenders that carry 2500 to 3000 gallons, it can take 5000 to 10,000 or more gallons of water to put out a fully involved structure fire, and even more for large houses, commercial structures, or electric vehicle fires. The issue is that to be effective, a pumper has to be staffed with a minimum of 3 firefighters (2 minimum) and a tender should be staffed with 2 firefighters (1 minimum). Being a combination department with both paid and volunteer staffing, depending on the day of the week or the time of day, we may or may not get a volunteer response to supplement the on-duty staff of 5 firefighters. For example, on the structure fire we had on Columbia Avenue on Christmas morning, the firefighter responding to Station 32 (which is volunteer staffed) in Clinton had to make a choice whether to bring a pumper or a tender. Knowing that the hydrant at Columbia and Martin was inadequate and marked out of service, he chose to respond in a tender, and in fact that was the tender that supplied the pumper attacking the fire. However, according to NFPA standards, we should have had a second pumper on scene to supply the backup line while we had firefighters inside the burning house. Because we had to choose the tender over the pumper, we operated without this margin of safety for our firefighters.

Secondly, water tenders are more manpower-intensive than fire hydrants. Once a pumper is connected to a hydrant, and the hydrant is opened, that firefighter can be re-assigned to other functions such as fire attack or a backup line. Whereas, a firefighter driving a water tender is committed to that task and not available for other assignments. In order for us to make an interior attack on a fire, Washington Labor and Industries law requires us to have "two in and two out", in other words, when we have a two-firefighter team make entry, we must have a second two-firefighter team outside the structure with another hose line, ready to back them up. Since the pumper must have a dedicated operator at the pump, that accounts for all five of our on-shift firefighters. If we have to have even one of those firefighters drive a tender, that means we cannot meet the "two in and two out" rule of law.

Thirdly, the Washington Survey and Rating Bureau (WSRB) that provides ratings that insurance companies use to determine fire insurance premiums, gives more credit for rated fire hydrants within 1000 ft of a building than they do for a water tender response to the same location. Therefore, property owners who do not have a fire hydrant within 1000 ft of their structure pay more for fire insurance than those who do have this water source. It doesn't matter to WSRB how many water tenders we can put on scene, a residence or business outside of an area with hydrants is going to pay more for insurance.

I hope this information is helpful.

Terry Ney  
Assistant Chief, Operations and Community Risk Reduction  
South Whidbey Fire/EMS