

APPENDIX S

DOH/Ecology/County Review Comments and Responses



Larry
Mayor
RECEIVED DEC 11 2006

STATE OF WASHINGTON
DEPARTMENT OF HEALTH

20435 72nd Ave. S., Suite 200, K17-12 • Kent, Washington 98032 -2358

December 5, 2006

LARRY HARTER
SOUTH PRAIRIE, TOWN OF
PO BOX F
SOUTH PRAIRIE WA 98385

COPY

RE: South Prairie Water System, ID# 82300
Pierce County
Water System Plan - 2006
Submittal #06-0901

Dear Mr. Harter:

Thank you for submitting the draft Water System Plan (WSP) for the South Prairie Water System received in this office on September 1, 2006. We have reviewed the plan and offer the following comments. The comments must be adequately addressed prior to approval.

Water System Description

1. Please provide a signed *Consistency Statement* from the appropriate Town of South Prairie official and from Pierce County local government (see attachment).

Water Demand

2. Please provide actual water use figures for 2005.
- ✓3. Provide water use on an annual basis for the years 2006 to 2012, average day and maximum day demand, with and without water conservation assumptions.

System Analysis

- ✓4. Page 2-6. The Peak Hour Demand was expressed as 220 gpm/ERU. The units seem to be incorrect. Please clarify this.
5. Page 4-9. Please clarify that nitrate sampling is required on an annual basis for each source. There is no reduction in frequency from annual testing.
- ✓6. Page 4-10, Section 4.2.1. In light of the potential exceedence of the new arsenic standard by Well No. 1 please update the last sentence of the first paragraph to indicate that the more stringent criteria is 0.010 mg/L and not 0.05 mg/L.



Source of Supply/Conservation

- ✓ 7. Attached is a copy of Department of Ecology's review of the Town's water rights for your files.
- ✓ 8. Page 2-3. New water use efficiency regulations should be in effect at the end of the year. It is anticipated that the maximum allowable amount of leakage will be 10%. It appears the six year average is 21%. Be aware that the draft *Water Use Efficiency Rule* would require that all municipal water suppliers maintain their distribution system leakage at or less than 10 percent of their annual production. Systems not meeting the leakage standard would be required to develop and implement a Water Loss Control Plan.

See page 2-7

Operations & Maintenance

- 9. Please include a map of the routine sample site locations for the Coliform Monitoring Plan. A map could not be found.
- ✓ 10. Page 7-3. Please clarify the operating permit definitions. It appears that the Blue and Yellow definitions have been transposed.
- ✓ 11. Table 7-3. A number of recommendations are proposed for a routine maintenance program. Which of these recommendations will actually be adopted by the Town?
Appropriate projects have been noted.
- ✓ 12. Table 7-6. Please update the NWRO phone number. It is 253-395-6757.
- 13. Page 7-14, Public Notification. Public Notification (PN) rules have a breakdown of notification requirements based on a three tiered system. For example a Tier 1 violation such as an acute coliform MCL violation requires a 24-hour notice. A Tier 2 violation, such as a non-acute coliform MCL violation, requires notice as quickly as possible but no longer than 30 days. It is recommended that the notification section be restructured to reflect the tier structure of the PN rule.

Improvement Program

- 14. Table 9-1. If project S1b would be used to address an arsenic exceedence for Well #1, it would need to be completed within 4 years of an actual MCL violation. It appears that the proposed schedule would not allow for this to happen. Please update the potential scheduling for S1b to take this into account.

Project S1b is not in the schedule.

Other Documentation

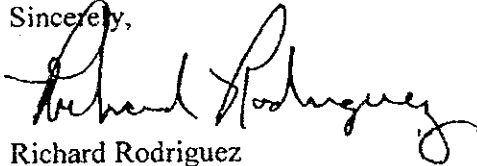
- 15. Please include some construction details if they are available. Does the Town have details for items such as meter settings, hydrants, concrete blocking, etc.?
- 16. Water systems with greater than 1000 connections are required to prepare a SEPA checklist as a part of the WSP. SEPA is not required for this document.

We hope that you have found these comments to be clear, constructive and helpful in the development of your final draft WSP. We ask that you submit the revised WSP on or before March 5, 2007. In order to expedite the review of your revised submittal, please include a cover letter summarizing how each of the above comments was addressed in the revised WSP and where each response is located (i.e., page numbers, Appendices, etc.)

Regulations establishing a schedule for fees for review of planning, engineering and construction documents have been adopted (WAC 246-290-990). Please note that we have included an invoice in the amount of \$1,167.00 for the review of the Water System Plan. This fee covers our cost for review of the initial submittal, plus the review of one revised document. Please remit your complete payment in the form of a check or money order within thirty days of the date of this letter to: **DOH, Revenue Section, and P.O. Box 1099, Olympia, WA 98507-1099.**

Thank you again for submitting your draft Water System Plan for our review. If you have any comments or questions concerning our review, please contact me.

Sincerely,



Richard Rodriguez
Regional Planner
(253) 395-6771

cc: John Ryding, DOH
Deb Hunemuller, DOE, SWRO
Mary Ausburn, Pierce County Dept. of Public Works
Gary Porter, TPCHD
Jennifer Dvorak, P.E., Parametrix



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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

October 5, 2006

Richard Rodriguez, Regional Planner
Department of Health
20435 72nd Ave S., Suite 200
Kent WA 98032

Dear Mr. Rodriguez:

Re: Town of South Prairie Water System Plan, ID# 82300, Pierce County, ODW # 06-0901

Thank you for the opportunity to review the Water System Plan (WSP) for the Town of South Prairie Water System. Consistent with the Memorandum of Understanding between our agencies, I reviewed the relevant portions of the Plan and offer the following comments.

The water right assessment is generally consistent with Ecology's records. The South Prairie Water System has adequate instantaneous and annual quantity as well as source capacity for the projected 20 year planning period.

Please contact me at (360) 407-0290 if you have questions regarding my comments.

Sincerely,

Deb Hunemuller
Water Resources Program
Southwest Regional Office

DH:th

cc: John Ryding, DOH

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DEPARTMENT OF ECOLOGY
NORTHWEST REGIONAL OFFICE



Attachment 5: Water System Plan and Small Water System Management Program Consistency Statement Checklist

This checklist is intended to ensure consistency of water system planning documents with adopted local comprehensive plans and development regulations. Each local planning jurisdiction in which the water utility provides service will review the relevant water system planning information and provide a signed consistency statement to the utility for submittal to the Department of Health. If the local planning agency will not respond, the highest authority within the utility (chair of governing body, executive director of private companies, etc.) must sign to verify consistency of the plan information.

Water System Name: _____ PWS ID: _____

Planning Document Title: _____ Plan Date: _____

Local Planning Jurisdiction: _____

The retail service area, and any other areas not served by a separate public water system, and land use identified in the WSP is consistent with the <i>adopted comprehensive plan and adopted development regulations and policies</i> .		
For WSPs only: The growth projection used to forecast water demand for the retail service area is consistent with the adopted city/county's population growth projections (and commercial development projection if applicable). If a different growth projection was used, the alternative growth projection and methodology proposed is acceptable based on explanation given.		
For WSPs only: New potential large water users (that may have a significant impact on the water system) that the city/county is aware of have been identified in the WSP.		
For city-owned systems only: All policies regarding water service outside the corporate boundaries are included in this WSP. These policies are consistent with the adopted <i>comprehensive plan and development regulations</i> .		
Where the local planning agency is unable to sign a Consistency Statement: Provide documentation of efforts to coordinate with local agencies with a 60-day timeline for local agency to respond. Include: name of contact, date, type of effort attempted, and response from local agency.		

I certify that the above statements are true to the best of my knowledge and that these statements support the conclusion that the subject-planning document is consistent with adopted comprehensive plans, development regulations, and other policies.

Signature

Date

Printed Name, Title, & Jurisdiction

****For any issues of inconsistency, please provide comments on how they can be resolved. ****

Direction below is provided as guidance for consistency verification. This list is not comprehensive.

For service area:

A copy of the adopted land use/zoning map that corresponds to the service area should be included. The uses provided in the WSP should be consistent with the adopted land use/zoning map.

Water systems may have policies on extensions of water service outside of their existing boundaries. These must be consistent with the local planning jurisdiction's (both city and county) adopted comprehensive plan and development regulations.

Under the Growth Management Act (GMA), domestic water service is considered both an urban and rural service. Unless the comprehensive plan and development regulations specifically limit water service or have an alternative definition of rural service than what is provided in the GMA, water service is allowed anywhere within the county.

For demand forecasting:

Water demand forecasts for the next six years and the 20-year planning horizons should be included. These forecasts should be consistent with the local population growth rate projections.

If the local population growth rate projections are not used, provide a detailed explanation on why the projections chosen more accurately describe the expected growth rate. Explain how it is consistent with the adopted land use.

Potential large water users may be identified by the following sources of information:

- Local planning agency
- Water utility
- Economic Development Council

DRAFT

February 5, 2007

U# _____

Jennifer Dvorak, Project Engineer
Parametrix
1231 Fryar Avenue
Sumner, WA 98390-0946

RE: Town of South Prairie – August 2006 Water System Plan Update

Dear Ms. Dvorak:

As the lead agency in the implementation of the Pierce County Coordinated Water System Plan (CWSP), Pierce County Public Works and Utilities is responsible for reviewing water system plans for consistency with the CWSP and the Pierce County Comprehensive Plan. This review process, although already occurring in Pierce County due to CWSP requirements, was emphasized by the Municipal Water Supply – Efficiency Requirement Act, Chapter 5 Laws of 2003 (Municipal Water Law) through the requirement of obtaining a “Consistency Statement” from the local planning agency.

I have reviewed the Town of South Prairie WSP and offer the following comments:

1. The maps showing the service area and land use to do identify Pierce County zoning for those areas outside the Town limits. Please amend the maps by adding this information.
2. The County acknowledges and concurs with the “near zero” growth projection for the duration of the sewer moratorium (estimated to be another 4-6 years). The projected growth rate of 9.5% for several years following the lifting of the moratorium should be re-evaluated during the next Plan update.
3. A couple of the Town’s policies/regulations may be inconsistent with the CWSP. **1.8.4** is proposed to be amended to prohibit any new construction of “Group B” systems within the South Prairie Water Service Area. The CWSP identifies the circumstances under which new public water systems may be approved. For example, if it was determined that South Prairie was unable to provide timely and reasonable service to a new development and no other water system was willing or able to provide service.

1.8.8 Urban Growth Area. This policy addresses the requirement for urban levels of service within the corporate limits and UGA and that new development within the UGA or in any portion of the Town's water service area must pay for extension to the water utility. Areas outside the Town's corporate limit have been identified as low density residential and agricultural land. Development within these areas must be consistent with the County's zoning and development regulations. In addition, as noted previously, if it were determined that South Prairie was unable to provide timely and reasonable service to new development within its Water Service Area, a new well/public water system could be allowed (pursuant to the CWSP).

Once the land use and zoning map has been amended to include the portion of the South Prairie Water Service Area that is located within Pierce County and the relevant zoning designations and the policies have been amended to show consistency with the CWSP, the County will provide a signed Consistency Statement.

Should you have any questions, I can be reached at 253.798.6169.

Sincerely,

Mary Ausburn, AICP
Senior Planner

cc: Richard Rodriguez, DOH

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March 29, 2007
PMX No. 216-4101-003 (01/011)

Mr. Richard Rodriguez
Department of Health
Suite 200, K17-12
20435 72nd Avenue South
Kent, WA 98032-2358

Re: South Prairie Water System, ID # 82300
Pierce County
Water System Plan – 2006
Submittal #06-0901

Dear Mr. Rodriguez:

Thank you for your review comments dated December 5, 2006, for the draft South Prairie Water System Plan. The following responses are offered:

1. *Comment: Provide a signed "Consistency Statement" from the appropriate South Prairie official and from Pierce County local government.*

Response: We received Pierce County review comments on February 5, 2007, a copy of which is attached to this letter. The comments have been addressed in this revision to the Water System Plan, and the plan has been forwarded to Pierce County for the requested Consistency Statement. We anticipate receipt of this Consistency Statement during your second review of this plan and will forward it to you upon receipt.

2. *Comment: Provide actual water use figures for 2005.*

Response: This comment was discussed with John Ryding in a phone conversation on January 9, 2006, with Jennifer Dvorak from Parametrix. The historical data which was used to calculate future water demand projections included 1999 – 2004 for a total of six years. Water demand information for 2005 was not available at the time the original calculations were performed and presented in the water system plan. Mr. Ryding indicated that documentation of the 2005 data could be developed in this response letter rather than propagating the minor modifications throughout the current water system plan.

The following information, which affects all projected water demand calculations, indicates the inclusion of 2005 data will decrease the projections. As such, use of the 1999 – 2004 data (omitting 2005) will provide more conservative projections than use of the 1999 – 2005 data.

	Units	1999-2004	1999-2005
Total System ERU's		180	182
Annual Daily Demand per ERU	gpd/ERU	239	235
Average Peak Factor		2.80	2.76
Maximum Day Demand	gpd/ERU	670	649
Peak Hourly Demand	gpm	220	216

3. *Comment: Provide water use on an annual basis for the years 2006 to 2012, average day and maximum day demand, with and without water conservation assumptions.*

Response: These numbers have been included in Tables 2-8 and 2-9.

4. *Comment: Page 2-6. The Peak Hour Demand was expressed as 220 gpm/ERU. The units seem to be incorrect. Please correct.*

Response: The unit has been corrected to read 220 gpm.

5. *Comment: Page 4-9. Please clarify that nitrate sampling is required on an annual basis for each source. There is no reduction in frequency from annual testing.*

Response: The text has been modified to indicate testing once a year.

6. *Comment: Page 4-10, Section 4.2.1. In light of the potential exceedance of the new arsenic standard by Well No. 1, please update the last sentence of the first paragraph to indicate that the more stringent criteria is 0.010 mg/L, and not 0.05 mg/L.*

Response: The sentence has been corrected.

7. *Comment: Department of Ecology's review of the Town's water rights is attached.*

Response: Acknowledged. The documents will be collected, in addition to other official correspondence relating to this water system plan, and included in a new Appendix S.

8. *Comment: Page 2-3. New water use efficiency regulations will require municipal water suppliers to maintain distribution system leakage at or less than 10% of their annual production.*

Response: Acknowledged. Page 2-7 of the Water System Plan discusses this and references a leak detection program as detailed in Section 5: Conservation, Water Rights, System Reliability and Interties. A leak detection program has also been developed as part of the improvement program, Project OM4, Leak Detection Program.

9. *Comment: Please include a map of the routine sample site locations of the Coliform Monitoring Plan.*

Response: The requested document has been provided and is included in Appendix F.

10. *Comment: Page 7-3. Clarify the operating permit definitions. It appears that the Blue and Yellow definitions have been transposed.*

Response: The permit definitions have been corrected in the plan.

11. *Comment: Table 7-3. Indicate which routine maintenance operations will be adopted by the Town.*

Response: All of the maintenance operations will be adopted by the Town with the adoption of this Water System Plan. Funding for the maintenance operations has been provided in the Financial Plan in Chapter 8.

12. *Comment: Table 7-6. Update the NWRO phone number.*

Response: The phone number has been updated.

13. *Comment: Page 7-14, Public Notification. Restructure the three-tiered notification requirements to match Public Notification rules.*

Response: The text has been modified to reflect the three-tiered system. Because of the extensive notification requirements, the reader has been referenced to DOH's *Public Notification Handbook* dated June 2000 for specific implementation actions.

14. *Comment: Table 9-1. Update the scheduling for Project S6 to address the arsenic problem in Well No. 1 within 4 – years of the MCL violation.*

Response: Project S6, Increase Chlorine Contact Time, Well No. 1, serves a dual purpose in that it increases chlorine contact time, but it also serves to blend water from Well No. 1 (high concentrations of arsenic) with water from Well No. 2 (low concentrations of arsenic). This project has been scheduled within four years of the anticipated MCL violation so as to address the arsenic concentrations. The feasibility of this solution was discussed briefly on page 4-11 of the plan. Additional possibilities have been documented in the Capital Improvement Plan in the event the Town wishes to pursue additional treatment prior to blending. As such, Project S6 still remains the Town's primary means for addressing arsenic at Well No. 1.

15. *Comment: Include construction details if they are available.*

Response: The requested document has been provided and is included in Appendix N.

16. *Comment: Water systems less than 1,000 connections are not required to prepare a SEPA checklist.*

Response: Acknowledged.

Please contact me regarding any additional questions about this Water System Plan at (253) 863-5128.

Sincerely,

PARAMETRIX



Jennifer Dvorak, P.E.

JD:dd

Enclosure

cc: Project File