



MEMO

Date: December 21, 2023

To: Doug Piehl, PE

CC: Benjamin Majors
Phyo Kyaw
Kim Gubbe
Mindy Brooks

From: Jeff Landrum RS

RE: Timberline Village #626, ID #88388, Water System Plan Part B Update

Thank you for the opportunity to review the Timberline Village Waster System Water System Plan (WSP) for Local Government Consistency. I have reviewed the WSP Update Draft dated July 10, 2023, along with WSDOH's Comments Letter dated December 15, 2023, and Ecology's Comments Letter dated August 22, 2023. I have the following comments:

1. Sections 1.6, Pg 4: This section discusses Thurston PUD's duty to serve new connections. Currently the system has a Blue DOH Operating Permit due to apparent distribution system leakage (DSL) and an exceedance of current water right allocation(s). As a result, the system is currently unable to service new connection requests leading to installation of several new permit exempt wells supporting individual and group domestic uses in the Timberline Village Water System's service area. Lewis County has allowed these uses after obtaining written acknowledgement from the Department of Ecology and Thurston PUD and after obtaining a signed Notice of Senior Water Rights Place of Use form from each applicant. Please address Thurston PUD's position towards existing and future permit exempt withdrawals under current DOH Operating Permit limitations and in the event of an approved expanded capacity to serve.

2. Pg 8, Section 2.2.3: The 2022 WUE Report indicates a Total Water Produced (TP) of 22.1 MG (67.9 acre-ft). Figure 2-1 indicates a Source Production of only 42 acre-ft per year. It is not clear if this figure indicates water produced, water sold, or water produced minus an approximate amount lost due to other causes. Please clarify.
3. Pg 8, Section 2.2.3: Figure 2-2 indicates that DSL was less than 10 gpm in 7 out of 8 data points spanning 2022. DSL from the 2022 WUE indicates 13.3 MG leakage, which is equivalent to an annual average DSL of 25 gpm for 2022. Please clarify.
4. PG 17, Section 4.6: This section indicates a current leakage rate of 5-8 gpm. 8 gpm would result in a WUE of 19% which is below the 20% threshold. However, the 2022 WUE indicates that the DSL is 60.1 %, inconsistent with an average leakage rate of less than 8 gpm. Please clarify.
5. Part A Appendix P, Pg 10. The Emergency Contacts Outside of Thurston PUD requires updating. Lewis County's Drinking Water Program Number is (360)740-1249. Contact person is Jeff Landrum. Emergency contacts should also include DOH, Office of Drinking Water, Southwest Regional Office Engineer, Phyo Kyaw, (564)669-3849. Additionally, under the Laboratory section, Dragon Analytical Lab is no longer operating.

