



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
SOUTHWEST DRINKING WATER OPERATIONS
P.O. Box 47823 Olympia, Washington 98504-7823
PHONE (360) 236-3030 FAX (360) 236-3029

October 12, 2022

Kimberly Gubbe
Timberline Village #628
1230 Ruddell Road Southeast
Lacey, Washington 98503

Subject: Timberline Village #628 Water System, ID #88388B, Lewis County; Capacity Analysis, ODW Project #22-0508

Dear Kimberly Gubbe:

Thank you for submitting a revised capacity analysis for the Timberline Village water system on August 9, 2022. Based on information provided in the cover letter, and water pumping data provided to the Office of Drinking Water (ODW) on June 30, 2022, the Timberline Village water system does not appear to have capacity for additional connections at this time.

According to the Department of Ecology in the enclosed letter, the water system is legally allowed to pump 58 acre-feet of water per year from its two wells. Timberline Village appears to have pumped more than the authorized amount multiple times in the past five years. This important information was not clearly presented in the capacity analysis. In future analyses, please explicitly compare the amount of water pumped in acre-feet per year to the annual water rights capacity in acre-feet per year.

The documentation provided also showed an unacceptable level of distribution system leakage (DSL). The average DSL for the past 3 years appears to be over 57%. DSL under the Water Use Efficiency Rule establishes a standard of 10 percent or less on a rolling 3-year average. Leakage up to 20 percent is allowed for small systems less than 500 connections. Since the water system exceeds the DSL standard, it must develop and implement a water loss control action plan per WAC 246-290-820(4).

We appreciate all that the PUD has done to improve the system's water use efficiency over the past five years. You have reduced DSL from over 50 acre-ft per year to under 12 acre-ft per year by fully metering the system, completing a zone metering plan, replacing 800+ feet of mainline, and working with customers to repair leaks on their properties.

It appears that you are working on a strategy to bring the leaks under control and gain the capacity to serve new customers. To demonstrate this, we would like you to submit a Water System Plan (WSP) that includes a more robust capacity analysis, along with a comprehensive description of your strategies to bring DSL rates under control and to ensure that the system can reliably meet customer demands without exceeding the limiting capacities of the system. It should be supported by at least two, but preferably three to five, years of source water production data showing that the system can reliably stay within its water rights allowance. It must also contain a water loss control action plan.


I understand that you already met with ODW staff in 2019 to discuss water system planning requirements, and that you have a draft WSP that is close to completion. I suggest that you schedule another meeting with my staff to ensure that the plan meets your needs and ours. Please contact connor.lockwood@doh.wa.gov and deborah.johnson@doh.wa.gov to continue the conversation.

Kimberly Gubbe
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I appreciate your hard work and your patience through this long process. I'm sorry that I don't have better news for you. I know that quite a few people have been waiting to get water service from this system.

If you have any questions, please contact me by e-mail at andy.anderson@doh.wa.gov.

Sincerely,


Andy Anderson, P.E.
Office of Drinking Water, Regional Manager

Enclosure
Timberline Village WSP.pdf

cc: Doug Piehl, Thurston PUD
John Weidenfeller, Thurston PUD
Sue Kennedy, Lewis County Public Health & Social Services
Connor Lockwood, ODW
Deborah Johnson, ODW
Tammy Hall, ECY



**STATE OF WASHINGTON
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September 22, 2022

Douglas Piehl, P.E.
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Lacey, WA 98503
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Andy Anderson, P.E.
Department of Health
Office of Drinking Water, Southwest Region
andy.anderson@doh.wa.gov

Re: Timberline Village Capacity Analysis, Water System ID #88388B

Dear Douglas Piehl and Andy Anderson:

Thank you for the opportunity to review the Capacity Analysis for the Timberline Village Water System. Consistent with the Memorandum of Understanding between the Departments of Health and Ecology, I reviewed the relevant portions of the capacity analysis and have the following comments.

- **Timberline Village reports excessive leakage.** The average distribution leakage for the past 3 years is over 57%. As you know, DSL under the Water Use Efficiency Rule establishes a standard of 10 percent or less on a rolling 3-year average. Leakage up to 20 percent is allowed for small systems less than 500 connections.
- **Timberline Village reports for 2018 and 2019, they have pumped 134% and 212%, respectively, above what their rights authorize.** This overuse of water was primarily due to excessive leakage. This system is authorized to pump a total of 58 acre-feet per year from two wells.

Although water use for 2020 and 2021 has been reduced more in alignment with their water rights allocation, the leakage rate for those years is still considered to be exceptionally high.



RCW 90.44.110 states no public groundwaters that have been withdrawn shall be wasted without economical beneficial use. Because leakage is not considered a beneficial use of water, Ecology cannot support additional connections to the system until the leakage rate is reduced.

Thank you for allowing my late response to this Water System Plan submittal.

If you have any questions, please call or email.

Sincerely

A handwritten signature in blue ink, appearing to read "Tammy Hall", with a long horizontal flourish extending to the right.

Tammy Hall, L.H.G.
Hydrogeologist/SWRO
Water Resources Program

cc: Kim Gubbe
kgubbe@thurstonpud.org

