

Commissioners

Linda Oosterman – District 1
Russell E. Olsen – District 2
Chris Stearns – District 3



Providing safe, reliable, affordable, and sustainable service.

February 12, 2024

Mindy Brooks
Senior Long Range Planner
Lewis County Community Development
360-740-2610
Mindy.Brooks@lewiscountywa.gov

Jeff Landrum RS
Environmental Health Specialist
Lewis County Environmental Health
360-740-1249
Jeffrey.Landrum@lewiscountywa.gov

Subject: Timberline Village #628 Water System, ID #88388, Lewis County
Water System Plan Part B Update

Dear Ms. Brooks and Mr. Landrum:

Thank you for your review of the Timberline Village water system plan update for consistency with Lewis County land use and long-range planning. Please see the following clarifications and updates below in response to Lewis County's comment letter of December 21, 2023:

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.

Response: *The Timberline Village 628 water system must provide water service if the Duty to Serve conditions of section 1.6 of the Water System Plan (WSP) can be met. Once approval for additional connections is obtained it is expected that conditions of section 1.6 will be met for all parcels within the Timberline Village 628 water system service area. Further drilling of new permit exempt wells or additional new connections to existing permit exempt wells would then*

not be allowable. However, existing homes or businesses served by permit exempt wells could continue utilizing these existing wells for water supply provided that no additional connections or permit exempt wells are subsequently added. Thurston PUD does not believe section 1.6 to be inconsistent with Lewis County plans or policies.

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.

Response: *Chapter 2 of the water system plan is a planning section and is used to project likely future water consumption and needs; for discussion of historical water use efficiency please see Chapter 4. As described in section 2.2.3 of the WSP, 42 acre-ft reflects water use after normalizing for the fire and main rupture. This is based on a conversation with WSDOH staff which noted that these occurrences were singular events and not reflective of typical operating circumstances and should not be included in future consumption projections. Thurston PUD does not believe section 2.2.3 to be inconsistent with Lewis County plans or policies.*

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.

Response: *Please see response to comment 2 above regarding WSP section 2.2.3.*

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.

Response: *Chapter 4 of the WSP describes Thurston PUD's water use efficiency (WUE) program. This section reports that for 2022, actual water loss was 60.1%, which was due to the previously discussed fire and main break. As also described in section 4.6, Thurston PUD has successfully found and fixed leaks and has greatly reduced leak loss; however there is a baseline 5-8 gpm loss which is not feasible to find and fix as it is made up of micro-leaks which are below the threshold of detection. There is no inconsistency, this is simply an assessment of the minimum achievable rate of leak loss. As a point of reference, the 2023 WUE report has not yet been published, however total water production for 2023 was 37.1 acre feet, with an average rate of leak loss of 6.67 gpm. Thurston PUD does not believe section 4.6 to be inconsistent with Lewis County plans or policies.*

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.

Thank you for noting this, Thurston PUD has updated its files and will amend this section during the next update of the Thurston PUD Part A Umbrella Plan.

Thank you again for your review of the Timberline Village 628 WSP Update, please do not hesitate to reach out to me with any further questions or comments.

Once this waster system plan is determined to be consistent with the planning and policies of Lewis County, we request that the **Local Government Consistency Form** be signed and returned. Comments received from the Department of Health have requested this be included with Thurston PUD's next submittal. Please provided this signed form at your earliest convenience. Again, if you have any questions, please do not hesitate to contact me.

Sincerely,

Douglas Piehl

Doug Piehl, P.E.

District Engineer

(360) 357-8783

doug.piehl@thurstonpud.org

Enclosure – Local Government Consistency Form