



3628 South 35th Street  
Tacoma, Washington 98409-3192

TACOMA PUBLIC UTILITIES

April 2, 2018

Mr. Steve Hirschey  
King County Utilities Technical Review Committee  
King Street Center  
201 S Jackson Street, Room 512  
Seattle, WA 98104

Re: Tacoma Water 2018 Water System Plan Available for Review

Dear Mr. Hirschey:

Tacoma Water has completed a draft of the water system's 2018 Water System Plan (WSP) update and is pleased to submit the WSP for review by the King County Utilities Technical Review Committee. Included in this submittal are:

- King County Water System Plan Checklist
- Local Government Consistency Form
- One hard copy of the 2018 WSP and CD with 2018 WSP and appendices

This 2018 WSP is an update to the last plan adopted by Tacoma Water in 2006. Tacoma Water's 2018 WSP update includes (but is not limited to): an updated demand forecast for the system out to 2037, analysis of distribution system deficiencies and necessary improvements, description of changes made to the system since the last WSP such as adding the Green River Filtration Facility, review of watershed conditions in relation to water quality, overview of the system's asset management program, and a capital improvement program and financial plan through 2026.

**Please provide a completed and signed Local Government Consistency Determination Form** and any other comments or questions you have on the draft 2018 WSP update by June 22, 2018, via email or regular mail to the address below:

Jason Moline  
3628 S 35<sup>th</sup> St  
Tacoma, WA 98409  
jmoline@ci.tacoma.wa.us

Tacoma Water plans to finalize the 2018 WSP in July after incorporating comments from the Washington Department of Health, counties, public, local agency, and adjacent water systems, as appropriate. Tacoma Water looks forward to receiving your review comments and appreciates your input and interest in its water system plan.

Sincerely,

Jason Moline, PE  
Water Supply Section  
Tacoma Water/Tacoma Public Utilities

# Guidance Document for King County's Review of Water System Plans (WSP)

## KEY:

*(S)= Shows information that must be addressed and will be substantively evaluated*

*(Sn)= Information that is required but not evaluated*

*(I)= Informational*

*Regional issues: All utilities will be asked for this information.*

*Local Issues: Only utilities serving unincorporated areas will be asked for this information.*

*Items are listed in the same general order as suggested by state Dept. of Health (DOH) WSP Checklist*

## Description of Water System

Regional Issues	
1	<p>Include a description of existing capital facilities owned by the utility. <b>(S)</b></p> <p><b>Response:</b> Chapter 5: Water Infrastructure</p>
2	<p>Is there a change to the utility's established service area as compared to that documented in the Coordinated Water System Plan (CWSP)? <b>(S)</b></p> <p><b>Response:</b> No, see Section 2.4.</p> <p>If the utility seeks to change the place of use of a water right, will the utility use the state DOH process to approve the change in place of use, or will it seek County approval per RCW 90.03.386(2)? <b>(Sn)</b></p> <p><b>Response:</b> N/A</p>
3	<p>Are future shared regional water supply sources (to be used within the twenty-year planning horizon) identified in the WSP also identified in the CWSP? <b>(Sn)</b>:</p> <p><b>Response:</b> Yes, see Sections 2.4.3 and 4.1</p>
Local Issues	
4	<p>a. Provide a map of utility's current Retail Service area and Future Service area (if applicable). <b>(Sn)</b></p> <p><b>Response:</b> See Figure 2-2</p> <p>b. If available, provide a GIS-compatible electronic file of service area boundary(s). <b>(I)</b></p> <p><b>Response:</b> Available on request</p>

5	<p>Does the WSP identify any areas within the utility's Retail Service or Future Service areas that the utility will not provide service due to (a) inability to provide timely and reasonable service; (b) lack of water rights; (c) lack of physical system capacity; or (d) inconsistency with local plans or service area policies? If so, identify such areas. <b>(Sn)</b></p> <p><b>Response:</b> There is no lack of service over the planning period or known inconsistencies with local plans and service area policies. See Sections 2.4, 2.5, 2.6, and 2.7.</p>
6	<p>Provide a copy of all of the utility's adopted service area policies, including but not limited to, any policies for extending direct service, developer extensions, and Satellite Management Agency (SMA), if applicable, within the utility's service area(s). Include adopted resolutions, policies or descriptions as to what is considered "timely and reasonable" service. To ensure orderly development in unincorporated areas, service area policies must be in place for the retail service area. For the future service area (if any), there should be at least a general description of how the utility plans to meet water service needs (e.g., factors to be considered or process to be used). <b>(Sn)</b></p> <p><b>Response:</b> Policies discussed in Sections 2.4 and 2.5</p>
7	<p>State whether or not proposed service will be consistent with the Countywide Planning Policies listed: G-4, EN-1, EN-19, DP-13, DP-21, PF-1, PF-2, PF-4, PF-5, PF-6, PF-7, PF-8, PF-9, and PF-10 and the King County Comprehensive Plan Policies listed: F-107, F-201, F-209, F-210, F-211, F-212, F-221, F-221A, F-223, F-231, F-232, F-246, F-249, F-251, F-252, F-253, F-254. <b>(S)</b></p> <p>See <a href="http://www.kingcounty.gov/property/permits/codes/growth/CompPlan.aspx">http://www.kingcounty.gov/property/permits/codes/growth/CompPlan.aspx</a> for text of current policies.</p> <p><b>Response:</b> Policies discussed in Section 2.5</p>
8	<p>Is the proposed WSP consistent with the adopted watershed plan for the area in which the utility is located? <b>(S - Vashon Island utilities only, N/A - others)</b></p> <p><b>Response:</b> N/A</p>
9	<p>Are the land-use and zoning designations used for unincorporated portions of the utility's service area consistent with the adopted King County Comprehensive Plan? <b>(S)</b></p> <p><b>Response:</b> Sections 2.6 and 3.1, Appendix L</p>

## Basic Planning Data

Regional Issues	
10	<p>Identify the six-year and twenty-year population and job (employment) growth projections for the retail service area used to forecast water demand and the basis for deriving these projections if they are not from the Puget Sound Regional Council.</p> <p>a. <u>For service areas inside cities</u>: For each city in which <i>a portion</i> is within the utility's service area, obtain a signed statement (letter or other written approval) from the city planning department providing or confirming an apportioned population and employment target for the city area <b>(Sn)</b>. If a city does not provide this information within a reasonable time, use Puget Sound Regional Council (PSRC) data <b>(Sn)</b>, OR some other reasonable mechanism (describe) <b>(S)</b>. For a city <i>entirely within the utility's service area</i>, use (or exceed) city adopted Growth Management Planning Council (GMPC) population and employment targets. <b>(Sn)</b></p> <p>b. <u>For unincorporated service areas</u>: Obtain apportioned population and employment data from the King County demographer or his/her designee. <b>(Sn)</b> If County does not provide this information within a reasonable time, use PSRC data <b>(Sn)</b>, OR some other reasonable mechanism (describe) <b>(S)</b>.</p> <ul style="list-style-type: none"> <li>• <i>Failure of a city or the County to timely respond to requests for data must be documented.</i></li> <li>• <i>Utilities may plan for demand <u>in excess of</u> the six- and twenty-year projections and/or GMPC targets.</i></li> </ul> <p>c. If the utility is provided a planning number by a city(s) and/or the County, and does not plan to meet or exceed that growth target, the WSP must explain the reason why. <b>(S)</b></p> <p><b>Response:</b> Provided in Section 3.1, and Appendices A1 and L.</p>
Local Issues	
11	<p>Provide information to confirm WSP consistency with local plans and regulations as they reasonably relate to water service. This may include land use and zoning within the service area, growth projections used in the demand forecast, and utility service extension policies or conditions of service for new connections. Include consistency statements by local jurisdictions or documentation for self-certification of consistency as described in WAC 246-290-108. <b>(S)</b></p> <p><b>Response:</b> See Sections 2.6 and 3.1, as well as Appendix L. Consistency statements will be requested and put in Appendix A1, concurrent with DOH and Counties' reviews of WSP.</p>

## System Analysis

Regional Issues	
12	<p>Provide information to confirm the utility has a supply of water in quantities necessary to meet projected demand for the six-year planning period and has supply or a plan for new supply(s) to meet projected demand for the twenty-year planning period. <i>(This may be satisfied by providing copy or summary of current supply contracts, water right self-assessment(s), quantities of water committed/available, and a discussion of any current disputes with these.</i> If the utility cannot meet projected demand in either the six- or twenty-year period, describe the CIP or other efforts planned to address supply needs. <b>(S)</b></p> <p><b>Response:</b> Provided in Section 3.1, Table 3-1, Figure 3-1; Chapter 4, Table 4-1 (water rights); Appendix F.</p>
Local Issues	
13	<p>Provide information confirming that the utility has capacity to meet peak water demand in the six-year planning period. <b>(S)</b></p> <p><b>Response:</b> See Sections 3.1, 4.3, and 6.3.3; Table 3-3, and Figure 3-1.</p>
14	<p>Is the utility providing fire flow, and if so, in what portions of its service area and at what level(s)? Reference fire flow standards in KCC 17.04 and 17.08 <b>(S)</b></p> <p><b>Response:</b> See Sections 5.7.1, 6.1, 6.2, and 6.3; meets or exceeds King Co. code.</p>

## Water Use Efficiency Program and Water Rights

Regional Issues	
15	<p>a. Is the utility meeting state requirements for water use efficiency? <b>(S)</b></p> <p><b>Response:</b> Yes, Section 3.2 and 3.3</p> <p>b. Is the utility exceeding these state requirements? (If so, describe.) <b>(I)</b></p> <p><b>Response:</b> Yes, Section 3.2 and 3.3</p>
16	<p>Is the utility proposing any increase in use of water within its <i>existing</i> water rights from within or otherwise impacting habitat areas or flow-impaired water bodies identified in the Regional Salmon Recovery Plan? If so, describe location of increased withdrawal. <b>(Sn)</b></p> <ul style="list-style-type: none"> <li>A description of such areas can be found at:  <a href="https://pspwa.app.box.com/s/hg99a5cgdiavk0kss2volwevlazke42h">https://pspwa.app.box.com/s/hg99a5cgdiavk0kss2volwevlazke42h</a> </li> </ul> <p><b>Response:</b> No Water demand for retail and wholesale uses is projected to decline. See Sections 3.1 and 4.1.</p>



17	<p>Is the utility proposing any <i>new source development</i> for which it does not have a water right that will occur in or otherwise impact habitat areas or flow-impaired water bodies identified in the Regional Salmon Recovery Plan? If so, please confirm whether the utility intends to follow the state statutory code procedures to secure such new water rights. If process is already initiated, please provide reference number. (S)</p> <ul style="list-style-type: none"> <li>• <i>A description of such areas can be found at:</i>  <a href="https://pspwa.app.box.com/s/hg99a5cgdiavk0kss2volwevlazke42h">https://pspwa.app.box.com/s/hg99a5cgdiavk0kss2volwevlazke42h</a></li> </ul> <p><b>Response:</b> No new source development. If the forthcoming IRP (see link in Section 4.6) indicates a need for future sources to be developed, then State Requirements will be followed to secure any associated water rights. See Sections 3.1, 4.1, 4.2, and 4.3.</p>
18	<p>Complete checklist of informational questions regarding recycled water use opportunities within the utility service area. (Sn)</p> <ul style="list-style-type: none"> <li>• <i>See copy of checklist under Related Information on the main UTRC webpage:</i></li> <li>• <i><a href="http://www.kingcounty.gov/depts/dnrp/utilities-technical-review-committee.aspx">http://www.kingcounty.gov/depts/dnrp/utilities-technical-review-committee.aspx</a></i></li> </ul> <p><b>Response:</b> Yes, Section 4.5 and Appendix B.</p>

### Source Water Protection

Regional Issues	
19	<p>If the utility uses groundwater and monitors groundwater levels, describe whether there have been any increasing or decreasing trends in the levels over time. (Sn)</p> <p><b>Response:</b> Sections 4.1 and 4.2.</p>
20	<p>If the utility uses groundwater, include the Wellhead Protection Area(s) program and map. (Sn)</p> <ul style="list-style-type: none"> <li>• <i>King County can provide the utility with the information it has on record regarding the utility's wellhead protection fields/areas upon request.</i></li> </ul> <p><b>Response:</b> Sections 7.6 and 7.7, Figure 4-2, Appendix K.</p>

### Improvement Program

Local Issues	
21	<p>Include a forecast of the utility's six and twenty-year capital facilities needs to address both existing deficiencies and additional capacity to meet growth needs, as well as the proposed locations and capacities of expanded or new capital facilities, together with a plan to fund such capital program (identifying potential sources of funding, and noting whether alternative financing strategies are being considered). (S)</p> <p><b>Response:</b> Chapters 11 and 12, Table 11-1, Appendix M</p>

## Financial Program

Regional Issues	
22	For systems with > 1,000 connections, include a one-year operating budget or financial plan. For systems with <1,000 connections, include a six-year operating budget or financial plan. <b>(S)</b>  <b>Response:</b> Chapter 12

## Miscellaneous

Regional Issues	
23	Include completed SEPA Checklist and Determination. <b>(S)</b>  <b>Response:</b> Appendix B – Will be added once complete and WSP finalized
24	<p>a. Are any existing critical facilities (as defined by KCC 21A.06.260) owned by the utility located within a floodplain or otherwise susceptible to flooding? <b>(Sn)</b></p> <p>b. Are any new critical facilities to be constructed by the utility in next six years located within a floodplain or otherwise susceptible to flooding? <b>(Sn)</b></p> <ul style="list-style-type: none"> <li>• <i>Latest floodplain maps can be accessed at <a href="http://www5.kingcounty.gov/iMAP/viewer.htm?mapset=wria">http://www5.kingcounty.gov/iMAP/viewer.htm?mapset=wria</a></i></li> <li>• <i>Upon request, King County will work with utility to address utility concerns regarding publication of facility location information.</i></li> </ul> <p><b>Response:</b> See Section 5.1.5.</p>
25	<p>Confirm whether the utility has a current franchise in place with King County, and whether there is a near-term need for right-of-way permits from King County. <b>(S)</b></p> <ul style="list-style-type: none"> <li>• For reference, King County will provide information from its records as to franchise status—expiration, territory.</li> <li>• If franchise is not current, the utility must begin the franchise renewal process, which is a separate process from the WSP process, in order to gain conditional WSP approval.</li> </ul> <p><b>Response:</b> See Section 2.4.</p>

## Proposed Timelines

<ul style="list-style-type: none"> <li>• Plans will be reviewed and comments issued from UTRC within ninety (90) days of receipt of plan.</li> <li>• A recommended ordinance will be forwarded to DNRP Director's office within sixty (60) days of receipt of Utility response to comment letter and final plan.</li> <li>• The Director will forward the recommended ordinance to the Executive within fourteen (14) days of receipt of plan.</li> </ul>
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## Local Government Consistency Determination Form

Water System Name: City of Tacoma/Water Division (Tacoma Water) PWS ID: 86800N

Planning/Engineering Document Title: 2018 Water System Plan Plan Date: March 2018

Local Government with Jurisdiction Conducting Review: \_\_\_\_\_

Before the Department of Health (DOH) approves a planning or engineering submittal under Section 100 or Section 110, the local government must review the documentation the municipal water supplier provides to prove the submittal is consistent with **local comprehensive plans, land use plans and development regulations** (WAC 246-290-108). Submittals under Section 105 require a local consistency determination if the municipal water supplier requests a water right place-of-use expansion. The review must address the elements identified below as they relate to water service.

By signing this form, the local government reviewer confirms the document under review is consistent with applicable local plans and regulations. If the local government reviewer identifies an inconsistency, he or she should include the citation from the applicable comprehensive plan or development regulation and explain how to resolve the inconsistency, or confirm that the inconsistency is not applicable by marking N/A. See more instructions on reverse.

Local Government Consistency Statement	For use by water system	For use by local government
	Identify the page(s) in submittal	Yes or Not Applicable
a) The water system service area is consistent with the adopted <u>land use and zoning</u> within the service area.	Section 2.4 Figure 2-2 Appendix L	
b) The <u>growth projection</u> used to forecast water demand is consistent with the adopted city or county's population growth projections. If a different growth projection is used, provide an explanation of the alternative growth projection and methodology.	Tables 3-1 and 3-2 Figure 3-1 Appendix L	
c) For <u>cities and towns that provide water service</u> : All water service area policies of the city or town described in the plan conform to all relevant <u>utility service extension ordinances</u> .	Section 2.4 Figure 2-2	
d) <u>Service area policies</u> for new service connections conform to the adopted local plans and adopted development regulations of all cities and counties with jurisdiction over the service area.	Section 2.6 Table 2-3	
e) <u>Other relevant elements</u> related to water supply are addressed in the water system plan, if applicable. This may include Coordinated Water System Plans, Regional Wastewater Plans, Reclaimed Water Plans, Groundwater Management Area Plans, and the Capital Facilities Element of local comprehensive plans.	Section 2.5 Section 2.6 Section 4.5 Section 7.7 Section 11.2	

I certify that the above statements are true to the best of my knowledge and that these specific elements are consistent with adopted local plans and development regulations.

Signature \_\_\_\_\_

Date \_\_\_\_\_

Printed Name, Title, & Jurisdiction \_\_\_\_\_



## Consistency Review Guidance

### ***For Use by Local Governments and Municipal Water Suppliers***

This checklist may be used to meet the requirements of WAC 246-290-108. When using an alternative format, it must describe all of the elements; 1a), b), c), d), and e), when they apply.

For **water system plans (WSP)**, a consistency review is required for the service area and any additional areas where a municipal water supplier wants to expand its water right's place of use.

For **small water system management programs**, a consistency review is only required for areas where a municipal water supplier wants to expand its water right's place-of-use. If no water right place-of-use expansion is requested, a consistency review is not required.

For **engineering documents**, a consistency review is required for areas where a municipal water supplier wants to expand its water right's place-of-use (water system plan amendment is required). For noncommunity water systems, a consistency review is required when requesting a place-of-use expansion. All engineering documents must be submitted with a service area map (WAC 246-290-110(4)(b)(ii)).

**A) Documenting Consistency:** The planning or engineering document must include the following when applicable.

- a) A copy of the adopted **land use/zoning** map corresponding to the service area. The uses provided in the WSP should be consistent with the adopted land use/zoning map. Include any other portions of comprehensive plans or development regulations that relate to water supply planning.
- b) A copy of the **growth projections** that correspond to the service area. If the local population growth projections are not used, explain in detail why the chosen projections more accurately describe the expected growth rate. Explain how it is consistent with the adopted land use.
- c) Include water service area policies and show that they are consistent with the **utility service extension ordinances** within the city or town boundaries. *This applies to cities and towns only.*
- d) All **service area policies** for how new water service will be provided to new customers.
- e) **Other relevant elements** the Department of Health determines are related to water supply planning. See Local Government Consistency – Other Relevant Elements, Policy B.07, September 2009.

**B) Documenting an Inconsistency:** Please document the inconsistency, include the citation from the comprehensive plan or development regulation, and explain how to resolve the inconsistency.

**C) Documenting a Lack of Local Review for Consistency:** Where the local government with jurisdiction did not provide a consistency review, document efforts made and the amount of time provided to the local government for review. Please include: name of contact, date, and efforts made (letters, phone calls, and emails). To self-certify, please contact the DOH Planner.

The Department of Health is an equal opportunity agency. For persons with disabilities, this document is available on request in other formats. To submit a request, please call 1-800-525-0127 (TTY 1-800-833-6388).



3628 South 35th Street  
Tacoma, Washington 98409-3192

TACOMA PUBLIC UTILITIES

June 4, 2019

Mr. Steve Hirschey  
King County Utilities Technical Review Committee  
King Street Center  
201 S Jackson Street, Room 512  
Seattle, WA 98104

Re: Tacoma Water 2018 Water System Plan

Dear Mr. Hirschey:

Tacoma Water has updated our 2018 Water System Plan to address the items indicated in your letter of June 27, 2018, and request your support to move forward with securing the King County Council's approval. Our final plan can be found online at [MyTPU.org/WaterSystemPlan](http://MyTPU.org/WaterSystemPlan) and is also included with this correspondence in CD and printed forms.

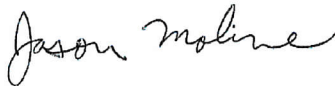
For convenience I have noted below the eight additions/clarifications from your initial review:

- Identify, reference or paraphrase the City's resolutions, policies and procedures that apply to how timely water service is determined for direct retail service in unincorporated King County; *see sections 2.4.5 and 2.4.6*
- Affirm or correct Table 3-1, Demands by Jurisdictions, as to the average day demand for service in unincorporated King County being 20 percent of total system demand which seems very high; *see updated Table 3-1*
- Clarify that in the rural area of King County fire flow is generally not required as most potential development overlaid by the City's retail service area in unincorporated King County meets the exception for fire flow in K.C.C. 17.08; *added confirming language to section 5.7.1*
- Confirm the land-use and zoning designations used for unincorporated portions of the utility's service area are consistent with the adopted King County Comprehensive Plan; *added confirming language to section 5.7.1*
- Include a complete King County Water Reclamation Evaluation Checklist that can be found online here – [https://www.kingcounty.gov/~media/environment/dnrp/documents/WaterReclamationChecklist12\\_2011.ashx?la=en](https://www.kingcounty.gov/~media/environment/dnrp/documents/WaterReclamationChecklist12_2011.ashx?la=en) *see appendix N*

- Include consistency statements from the cities that you provide water service to affirming the Plan is consistent with their respective planning efforts; [see appendix A](#)
- Include a State Environmental Policy Act checklist and threshold determination for the adoption of the Plan; and [see appendix B](#)
- Include the resolution or ordinance from the City Council approving the final water plan. [See appendix A](#)

I look forward to hearing from you regarding next steps to obtain King County Council approval. I can be reached at [jmoline@ci.tacoma.wa.us](mailto:jmoline@ci.tacoma.wa.us) or 253-396-3383.

Sincerely,

A handwritten signature in cursive script that reads "Jason Moline".

Jason Moline, PE  
Water Supply Section  
Tacoma Water/Tacoma Public Utilities

cc: Richard Rodriguez, Regional Planner, Washington State Department of Health

Enclosures:

Tacoma Water's April 2, 2018 letter to King County  
King County's June 27, 2018 draft plan review response  
2 CD's and 2 printed Tacoma Water 2018 Water System Plan