

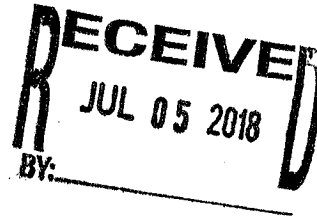


State of Washington
DEPARTMENT OF HEALTH

NORTHWEST DRINKING WATER REGIONAL OPERATIONS
20425 72nd Avenue South, Suite 310 • Kent Washington 98032-2388

July 3, 2018

CHRIS MCMEEN
TACOMA WATER DIVISION CITY OF
PO BOX 11007
TACOMA WA 98411



RE: Tacoma Water Division, ID#86800
Pierce County
Water System Plan- 2018
Submittal #18-0402

Dear Mr. McMeen:

Thank you for submitting the Water System Plan (WSP) for the City of Tacoma (the City) received in this office on April 6, 2018. We have reviewed the plan and offer the following comments. These comments must be adequately addressed prior to approval of this WSP. We were unable to view a number of the links referenced in the document and the re-establishment of those links may assist you in responding to some of our comments.

System Description

1. Provide a statement of local government consistency from your Planning Department, Pierce County Planning and Land Services, and the following local land use jurisdictions: Federal Way, Fircrest, University Place, Lakewood, Puyallup, Bonney Lake, and the Town of Ruston.
2. Respond to the King County UTRC letter dated June 27, 2018, and provide an adoption ordinance from the King County Council.
3. The connection data contained in our Sentry Internet database suggests that you should revise Table 2-2.
4. Section 2.4 Service Area; Consider adding a section describing TPU's Wholesale Service Area. This would serve to highlight and re-emphasize the place of use of your water resource inventory. You may wish to recreate the Wholesale Service Area description found in TPU's 2007 WSP; p.2-14, 2.32. At the very least, we would suggest including all of central Pierce County and the East and South King County Critical Water Supply Service Areas.

Basic Planning Data Planning

No comment



System Analysis

5. The 2018 Watershed Management Plan describes a complete water quality monitoring program in the Eagle Gorge Reservoir. Has the monitoring program identified any trends that concern Tacoma Water?
6. Please indicate how Tacoma will decide on the potential improvements to the Cumberland service area described in Table 6-8?
7. It appears that the development of TPU's Asset Management Program (AMP) is moving forward and providing you with detailed information regarding your facilities. Do you have a time frame established for completing the 14 AMP Initiatives listed in Table 10-1?
8. The AMP lists 19 asset classes (p. 10-1). For critical system asset classes such as storage facilities, pump stations, valves, transmission pipelines, and wells, have remaining useful life analyses been performed and have replacement costs been estimated? Examples include the analysis of Pipeline 1 described on p. 10-13 and the condition and useful life of the treatment facilities at Well 12A. Will the Pipeline 1 analysis include an assessment of its over-all condition, operational integrity, and remaining useful life? The Capital Improvement Plan shows replacement projects for Pipeline #1 at the Puyallup River and at Deep Creek. Please indicate the decision criteria Tacoma used to select those projects?

Water Use Efficiency and Water Resource Analysis

9. The TPU WSP was sent to Department of Ecology's Southwest Regional Office for review of water rights on April 6, 2018. To date, no review letter has been issued.

Source Water Protection

No comment

Operation & Maintenance

No comment

Distribution Facilities Design and Construction Standards

10. Have there been any changes to Tacoma's Construction Standards since the last water system plan was developed?

Improvement Program

11. Please confirm the dates of the Strategic Plan and the Capital Improvement Plan referenced in the document. The document indicates that the Strategic Plan was last updated in 2012 and the Capital Improvement Plan covers years 2017 through 2026. Please identify the initiatives that Tacoma Water hasn't addressed from the 2012 Strategic Plan and clarify whether the document is intended to be an eight-year plan or a ten-year plan. Appendix C does include a Capital Improvement Plan covering the years 2015 through 2034 but it is unclear how it relates to chapter 11.

Financial Program

12. It appears that the 2017 Total Revenue Available identified in Table ES-2 on page xxvi is a typographical error. It should read 95,558.

Other Documentation

13. The water system must meet the consumer input process outlined in WAC 246-290-100(8). Please include documentation of a consumer meeting discussing the WSP, prior to DOH approval of the WSP.
14. Prior to DOH approval, the City's governing body must approve and adopt the WSP.
15. Please provide copies of any comments made by adjacent purveyors, and other interested parties along with your response to those comments.

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 **October 3, 2018**. 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 **\$5484.00** 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 revised Water System Plan for our review. If you have any comments or questions concerning our review, please contact me at (253) 395-6771.

Sincerely,



Richard Rodriguez
WSDOH Regional Planner

cc: Robert James, DOH
Dan Cardwell, Pierce County Planning and Land Services
Tacoma-Pierce County Health Department
Steve Hirschey, King County UTRC
Heather Pennington, P.E., Tacoma Water
Tammy Hall, DOE-SWRO



King County

Utilities Technical Review Committee

Department of Natural Resources and Parks

King Street Center

201 South Jackson Street, Suite 512

Seattle, WA 98104-3855

www.kingcounty.gov

June 27, 2018

Mr. Jason Moline
Water Supply Section
Tacoma Water
3628 South 35th Street
Tacoma WA 98409-3192

Dear Mr. Moline:

Thank you for submitting the City of Tacoma, 2018 Water System Plan, March 28, 2018, (Plan) for King County approval. We received the plan on April 6, 2018. In accordance with the statute and King County Code 13.24, the King County's Utilities Technical Review Committee (UTRC) has reviewed the Plan for consistency with the King County Comprehensive Plan and the King County Code.

In reviewing the Plan, the UTRC found that the Plan is largely consistent with the County's comprehensive plan and code. However, eight additions or clarifications are necessary before we can make a recommendation to the King County Council for approval of the City's final Plan. The items are:

- 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;
- 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;
- 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;
- 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;
- 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
- Include consistency statements from the cities that you provide water service to affirming the Plan is consistent with their respective planning efforts;

- Include a State Environmental Policy Act checklist and threshold determination for the adoption of the Plan; and
- Include the resolution or ordinance from the City Council approving the final water plan.

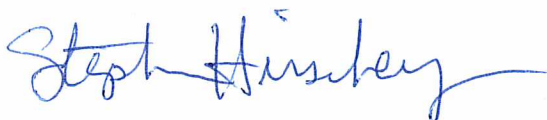
Often, the construction and/or maintenance of utility lines require work within the road right of way (ROW) for roads in unincorporated King County. When a utility has a proposed project within unincorporated King County, please contact the King County Road Services Division, Engineering Services Section for coordination with the County's annual overlay program. Failure to do so may result in the denial of the permit to work within the ROW once an overlay of the road section has been completed. Although each utility has a set of construction standards and specifications for their projects, when construction and or maintenance of utilities requires work within the road ROW for roads in unincorporated King County, please be aware that the current edition of the King County Road Design and Construction standards apply to any installation or work in these ROWs. Not adhering to these standards could result in the installation of non-specified and approved methods and/or materials that are out of the specifications for King County, and could potentially add additional costs to the purveyor for future repairs or adversely affect acceptance of those repairs/installations. The KCDOT 2016 King County Road Design and Construction Standards can be found on the World Wide Web at:

<http://www.kingcounty.gov/transportation/kcdot/Roads/EngineeringServices/RoadStandards2007.aspx>

Finally, we take this opportunity to ensure a common understanding between the County and City on the franchise held by the City. We agree with the City that you hold Franchise 14349 and it expires in 2027. We also note all other previous franchises held by the City have expired and that you are in the process of working with King County to obtain a new franchise for infrastructure in King County. If your understanding of current franchise agreements is different, please clarify in your final Plan or in a separate response to the County.

We look forward to seeing the final Plan and working with you to secure the King County Council's approval. The Council's action will represent King County's final action on the Plan. If you have any questions or concerns about any of the information in the letter, please do not hesitate to call me at 206-477-5387.

Sincerely,



Stephen Hirschey
Chair, Utilities Technical Review Committee

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



KING COUNTY

1200 King County Courthouse
516 Third Avenue
Seattle, WA 98104

Signature Report

Ordinance 18988

Proposed No. 2019-0352.1

Sponsors Lambert

1 AN ORDINANCE approving the 2018 Tacoma water
2 system plan.

3 STATEMENT OF FACTS:

- 4 1. King County has adopted K.C.C. chapter 13.24, which requires
5 approval of comprehensive plans for water utilities that distribute or obtain
6 water in unincorporated King County as a prerequisite for operating in
7 unincorporated King County, receiving approval for annexation proposals,
8 being granted right-of-way franchises, and being given approval for right-
9 of-way construction permits. K.C.C. 13.24.060 prescribes the
10 requirements for approval of such plans, including consistency with state
11 and local planning requirements.
- 12 2. The city's previous water system plan was prepared in 2011.
- 13 3. The city's service area includes a portion of unincorporated King
14 County and the city has adopted a water system plan ("the plan").
- 15 4. King County has adopted a comprehensive plan that includes water
16 supply policies in its provisions for facilities and services (policies F-101
17 through F-254) that call for consistency with other adopted plans, support
18 for regional water supply planning, pursuit of reclaimed water, water
19 conservation and protection of water resources.

20 5. K.C.C. chapter 13.24 requires the utilities technical review committee
21 to review and make a recommendation to the King County executive and
22 council on the plan and the requirements under K.C.C. chapter 13.24 and
23 consistency with the King County Comprehensive Plan. The utilities
24 technical review committee has reviewed the planning data and city
25 operations and has found:

- 26 a. The plan uses population and employment forecasts developed by the
27 Puget Sound Regional Council for the city's service area;
- 28 b. Portions of the city's service area are in unincorporated King County;
- 29 c. The capital facility plan is adequate to meet anticipated facility and
30 service needs;
- 31 d. The plan is consistent with applicable Washington state water quality
32 laws; and
- 33 e. The plan is consistent with other pertinent county adopted plans and
34 policies.

35 6. The Washington state Department of Health approval is pending upon
36 King County's approval of the plan.

37 7. Under the state Environmental Policy Act the city issued a
38 determination of nonsignificance for the plan on June 1, 2018. There were
39 no appeals.

40 8. The city's operations and facilities meet multiple existing statutory,
41 administrative and planning standards. As the city's operations, facilities
42 and planning meet the requirements of the King County Code and are

43 consistent with the King County Comprehensive Plan, the utilities
44 technical review committee has recommended approval of the plan.
45 BE IT ORDAINED BY THE COUNCIL OF KING COUNTY:

46 SECTION 1. The 2018 Tacoma water system plan, Attachment A to this
47 ordinance, is hereby approved as a water system plan.
48

Ordinance 18988 was introduced on 9/4/2019 and passed by the Metropolitan King
County Council on 10/2/2019, by the following vote:

Yes: 9 - Mr. von Reichbauer, Mr. Gossett, Ms. Lambert, Mr. Dunn,
Mr. McDermott, Mr. Dembowski, Mr. Upthegrove, Ms. Kohl-Welles
and Ms. Balducci



KING COUNTY COUNCIL
KING COUNTY, WASHINGTON

Rod Dembowski, Chair

ATTEST:

Melani Pedroza, Clerk of the Council

APPROVED this 15 day of OCTOBER, 2019.

Dow Constantine, County Executive

Attachments: A. Water System Plan 2018

RECEIVED
2019 OCT 15 PM 3:20
CLERK
KING COUNTY COUNCIL



Pierce County
Planning & Public Works

2401 South 35th Street, Room 2
Tacoma, Washington 98409-7460
piercecounitywa.org/ppw

Dennis Hanberg—Director
ghanber@co.pierce.wa.us

September 27, 2018

Jason Moline, P.E.
Tacoma Water
3628 S. 35th St.
Tacoma, WA 98409

RE: 2018 Water System Plan

Dear Mr. Moline:

Thank you for the valuable time and effort you put toward the CWSP process. We have reviewed your plan and email responses from April 2018 to September 2018, and find that all submittals are consistent with the County's Comprehensive Plan and CWSP.

If you have any questions, please contact me at vaughan.cary@piercecounitywa.gov or 253-798-7163.

Sincerely,

A handwritten signature in blue ink, appearing to read "Vaughan Cary".

Vaughan Cary
Assistant Planner

VC:ta

c: Richard Rodriguez, WA State DOH, 20425 - 72nd Avenue South, Suite 310, Kent, WA 98032- 2358
Debbie Bailey, Pierce County Dept. of Emergency Management
Chrissy Cooley, Tacoma-Pierce County Health Department
Warner Webb, Pierce County Fire Marshal
Fox Island Mutual Water, PO Box 35, Fox Island, WA 98333
Peninsula Light Company, 13315 Goodnough Drive NW, Gig Harbor, WA 98332
Washington Water Service Company, 14519 Peacock Hill Avenue NW, Gig Harbor, WA 98335
Northwest Water Systems, 7245 Bethel Burley Road SE, Port Orchard, WA 98367
Jason Moline, Tacoma Public Utilities, 3628 South 35th Street, Tacoma, WA 98409
Rainier View Water Company, 5410 189th Street East, Puyallup, WA 98375
City of Fircrest, 115 Ramsdell Street, Fircrest, WA 98466
Lakewood Water District, 11900 Gravelly Lake Dr. SW, Lakewood, WA 98499
Summit Water Supply Company, 9701 50th Ave. E., Tacoma WA 98446
City of Fife, 5411 23rd Street East, Fife, WA 98424

Parkland Light and Water 12918 Park Ave. S., Tacoma WA 98444
Western State Hospital, 9601 Steilacoom BLVD SW., Lakewood, WA 98498
Town of Steilacoom, 1030 Roe St., Steilacoom, WA 98388
City of Milton, 1000 Laurel Street, Milton WA 98354
Fruitland Mutual Water Company, 4001 9th St. SW., Puyallup, WA 98373
Curran Road Mutual Water Association, 5003 141st St. Ct. E., Tacoma, WA 98446
City of Puyallup, 333 S. Meridian, Puyallup, WA 98371
Valley Water District, 14515 Pioneer Way E, Puyallup, WA 98372
City of Sumner, 1104 Maple Street, Suite 260, Sumner, WA 98390
City of Bonney Lake, PO Box 7380, 9002 Main Street East, Bonney Lake, WA 98391
View Royal Water Company, 45 View Royal Avenue, Victoria BC
Marlon Water Company, 25905 84th East, Buckley, WA 98321
Town of South Prairie, 121 Washington St, South Prairie, WA 98385
City of Orting, 110 Train ST. SE, Orting, WA 98360
Southwood Water System, 219 S. 115th Street, Tacoma, WA 98444
Spanaway Water Company, 18413 B St. E. Spanaway, WA 98387

N:\Long Range Planning\CWSP\Water System Plan Review after 10_11(PALS)\Tacoma\Tacoma_Water_approval_ltr_8_19_18.docx

Local Government Consistency Review Checklist

Water System Name: City of Tacoma/Water Division (Tacoma Water) PWS ID: September 27, 2018

Planning/Engineering Document Title: 2018 Water System Plan

Plan Date: March 28, 2018

Local Government with Jurisdiction: Pierce County

WAC 246-290-108 Consistency with local plans and regulations:

Consistency with local plans and regulations applies to planning and engineering documents under WAC 246-290-106, 246-290-107, and 246-290-110(4)(b) (ii).

1) Municipal water suppliers must include a consistency review and supporting documentation in its planning or engineering document describing how it has addressed consistency with **local plans and regulations**. This review must include specific elements of local plans and regulations, as they reasonably relate to water service as determined by Department of Health (DOH). Complete the table below and see instructions on back.

| Local Government Consistency Statement | Page(s) in Planning Document | Yes – No – Not Applicable |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|---------------------------|
| a) The water system service area is consistent with the adopted <u>land use and zoning</u> within the applicable service area. | Section 2.4 Figure 2-2 Appendix L Appendix M Subsection 2.4.6 | Yes |
| b) The <u>six-year growth projection</u> used to forecast water demand is consistent with the adopted city/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 & 3-2 Figure 3-1 Appendix L Subsection 2.4.6 | Yes |
| c) Applies to <u>cities and towns that provide water service</u> : All water service area policies of the city or town are consistent with the <u>utility service extension ordinances</u> of the city or town. | Section 2.4 Figure 2-2 Subsection 2.4.6 | Yes |
| d) <u>Service area policies</u> for new service connections are consistent with the adopted local plans and adopted development regulations of all jurisdictions with authority over the service area [City(ies), County(ies)]. | Section 2.5 Table 2-3 Section 2.6 Appendix M | Yes |
| e) <u>Other relevant elements</u> related to water supply are addressed in the water system plan, if applicable; Coordinated Water System plans, Regional Wastewater plans, Reclaimed Water plans, Groundwater Area Management plans, and Capital Facilities Element of Comprehensive plans. | Section 2.5 Section 2.6 Section 4.5 Section 7.7 Section 11.2 Section 2.6 | Yes |

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

9/27/18

Date

Vaughan Cary, Assistant Planner, Pierce County Planning and Public Works
Printed Name, Title, and 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 retail 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 non-community 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 per WAC 246-290110(4)(b)(ii).

A) Documenting Consistency: Municipal water suppliers must document all of the elements in a consistency review per WAC 246-290-108.

- 1 a) Provide 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 are related to water supply planning.
- 1 b) Include a copy of the **six-year growth projections** that corresponds to the service area. If the local population growth rate projections are not used, provide a detailed explanation on why the chosen projections more accurately describe the expected growth rate. Explain how it is consistent with the adopted land use.
- 1 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.
- 1 d) Include all **service area policies** for how new water service will be provided to new customers.
- 1 e) **Other relevant elements** related to water supply planning as determined by the department (DOH). 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 provide direction on how this inconsistency can be resolved.

C) Documenting Lack of Consistency Review by Local Government: 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 their review. Please include: name of contact, date, and efforts made (letters, phone calls, and e-mails). In order 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).