

*APPENDIX AA*

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*DOH CORRESPONDENCE*



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
EASTERN DRINKING WATER REGIONAL OPERATIONS  
16201 E Indiana Avenue, Suite 1500, Spokane Valley, Washington 99216-2830  
TDD Relay 1-800-833-6388

January 5, 2017

John Finch  
City of Richland  
PO Box 190  
Richland, WA 99352

Subject: City of Richland; PWS ID #72250; Benton County  
Water System Plan; Submittal #16-1103; DOH Comments

Dear Mr. Finch:

Thank you for providing the draft Water System Plan (WSP) for the City of Richland received in this office on November 1, 2016. The following comments will need to be addressed before the Department of Health (DOH) can approve the document:

1) With regard to the plan approval period, throughout the document:

- Please state the last year of the planning period in the Executive Summary or Section 1 (e.g. 2023 for a 6-year plan, 2027 for a 10-year plan).
- Many projections are provided through 2025, though, the operational budget is notably only through 2021. This would result in no more than a 6-year approval period, evaluated under the old rule. Please provide projections through the last year of the desired planning period.
- Please document what effect a longer (or shorter) plan approval period would have on the update schedule for the Regional Water Forecast and Conservation Plan (RWFCP).

## Chapter 2

2) Regarding Table 2-10:

- The number of single family residential connections should equal the number of ERUs delivered to them. Please consider separating the Single-family Residential block into irrigated and non-irrigated blocks. This will demonstrate more clearly why the number of single family connections is not equal to the number of ERUs served.
- The number of multifamily connections is inconsistent with Line 26B of the water facilities inventory in Appendix Q.

## Chapter 3

- 3) Page 3-5: Please describe any coordination that the City does with homeowners that are in areas of excessive water pressure and need a pressure reducer.
- 4) Regarding storage deficiencies which, as documented, could place limits on allowed future demands:
  - Table 3-5 on Page 3-11 shows significant projected source of supply deficit for the Tapteal I Zone within 10 years. The text before the table indicates that the City will not have a deficit at the 10 year mark if the temporary water service agreement with BMID has been discontinued. Please provide additional detail regarding the BMID temporary intertie and its impact on this analysis. How will the City ensure additional capacity is in place to serve the projected growth if water service is still being provided to BMID under the temporary service agreement?
- 5) Please address the highlighted areas on Page 3-51.

#### **Chapter 4**

- 6) Please provide public notice and signed minutes for a water use efficiency (WUE) consumer information meeting regarding the adoption of the City's WUE demand side goal in the second draft and address the highlighted areas on Page 4-3.
- 7) Please update your water system's past Water Use Efficiency Annual Performance Reports to reflect the recalculated production and consumption record. Contact DOH Operator Support Manager Larry Granish at [Larry.Granish@doh.wa.gov](mailto:Larry.Granish@doh.wa.gov) for instructions.
- 8) Please estimate the water saved from efficiency measures over the past 6 years.
- 9) The Department of Ecology has issued a comment letter regarding this submittal. A copy of the review letter dated December 20, 2016 from the Department of Ecology is enclosed. Please address the issues, if any, contained in the letter in the second draft submittal.

#### **Chapter 6**

- 10) An Emergency Response Program (ERP) was not found in this submittal. Please include an ERP, excluding the vulnerability assessment, in the next submittal. Provide signed documentation that the vulnerability assessment has been completed.
- 11) Page 6-6: Checking the screens on reservoir and well casing vents is currently listed in the WSP as an annual task. We recommend that water systems inspect the screens more than once per year. We also recommend that other areas critical to keeping out rodents and other contaminants be inspected as well, including the reservoir hatches, end of the reservoir overflow lines, and electrical conduit and junction boxes leading to wellheads and reservoirs.



## **Chapter 7**

12) Please provide a paper copy of the City's drinking water standard specifications.

## **Chapter 8**

13) Please present Table 8-3 in a larger format.

## **Appendices**

14) Sample copies of letters sent to a) owners and operators of potential contaminant sources and b) local jurisdictions and agencies were not found in our copy of Appendix R.

## **Other**

15) 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 Water System Plan prior to its approval.

16) When DOH is ready to approve the document we will notify you. At that time the governing body will need to officially approve the Water System Plan and send DOH documentation of plan approval by the governing body, such as a copy of the signed meeting minutes or a copy of the signed resolution. When the documentation is received we will send a letter documenting DOH approval.

## **Recommendations**

The following items are not necessary for the approval of the Water System Plan, but are recommended because we believe that they would improve understanding or usefulness of the plan.

17) Regarding bullet 3 of the Water Quality subsection, please note that National Science Foundation (NSF) 60 addresses drinking water additives and NSF 61 addresses coatings in contact with drinking water.

18) The City has documented a sufficient number of demand side measures to satisfy the requirement. However, the uniform block rate described in the Rate Structure subsection on Page 4-6 and included in Table 4-2 does not qualify as a WUE measure.

## **END OF COMMENTS**

The department's review of your water system plan does not confer or guarantee any right to a specific quantity of water. Our review is based on your representation of available water quantity. If the Washington Department of Ecology, a local planning agency, or other authority responsible for determining water rights and water system adequacy determines that you have

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January 5, 2017  
Page 4

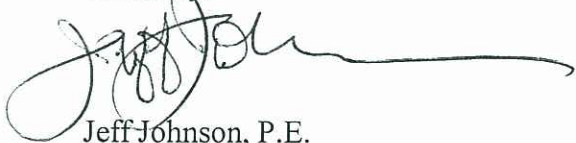
use of less water than you represent, the number of approved connections may be reduced commensurate with the actual amount of water and your legal right to use it.

We hope that you have found these comments to be clear, constructive, and helpful in the development of your final WSP. We ask that you submit **two copies** of the revised WSP **on or before April 5, 2017**. In order to expedite the review of your revised submittal, please complete the enclosed DOH Comment Response Form 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 for **\$5,484** 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, P.O. Box 1099, Olympia, WA 98507-1099.

Thank you again for submitting your draft Water System Plan for our review. If you have any comments or questions concerning our review please contact either of us at (509) 329-2110 or (509) 329-2137, respectively.

Sincerely,



Jeff Johnson, P.E.  
Regional Engineer  
Office of Drinking Water  
Division of Environmental Public Health



Brian A. Sayrs  
Regional Planner  
Office of Drinking Water  
Division of Environmental Public Health

Enclosures: Invoice  
Comment Response Form  
Department of Ecology correspondence

cc: Ying Fu, Department of Ecology, Eastern Regional Office  
Benton-Franklin Health District  
Benton County Planning Department  
Ryan Withers, PE, RH2 Engineering, Inc  
George Simon, DOH Regional Compliance Program Director  
Alyssa Gersdorf, DOH WFI Coordinator  
Larry Granish, DOH Operator Support Manager





STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

December 20, 2016

Mr. John Finch  
City of Richland  
PO Box 1920  
Richland, WA 99352

Re: City of Richland; PWS ID # 72250; Benton County  
Water System Plan Update; DOH Project #16-1103

Dear Mr. Finch:


I have reviewed the above referenced document in accordance with the *2007 Memorandum of Understanding* between Department of Health (DOH) and Department of Ecology (Ecology), and in accordance with RCW 90.03.386. Ecology's review is focused only on the subject water system's water rights legitimacy, adequacy and related issues affecting the submitted report.

The City of Richland has 12 water rights (listed in Table 4-4) for municipal Portable water supply. The water right self-assessment Tables 4-4, 4-5 and 4-7 appear to be current and correct. The City has a total instantaneous right (portable portion)  $Q_i$  of 43,766 gpm, and annual quantity  $Q_a$  of 34,947.95 acre-ft/yr. The City has an adequate water right for current operation, 6 year and 20 year forecast growth.

On page 4-28 of the report, it was recommended that all water right certificates listed in Table 4-5 be issued conforming documents by Ecology. This is not correct. For those certificates that are defined as irrigation purpose of use, they cannot be conformed. The City can file change applications to change the purpose of use of those certificates.

These are my comments at this time. Please contact me should you have any questions regarding this letter. I can be reached at (509) 329-3451 or by email at [yifu461@ecy.wa.gov](mailto:yifu461@ecy.wa.gov).

Sincerely,

  
Ying Fu  
Water Resources Program

YF:sh

cc: Brian Sayrs, DOH  
Tom Perkow, DOE/CRO



