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TACOMA, WA 98402

February 2025

Merideth Jones  
Regional Planner  
Department of Health Office of Drinking Water  
PO Box 47823  
Olympia, WA, 98504

Sent via: *Email*

Subject: **City of Kelso; Water System Plan Submittal #23-0201**

Dear Brenda:

The responses to the Department of Health's Office of Drinking Water's (DOH ODW) comments are shown below with the responses in red text below.

### General

1. The submitted WSP did not include a PE signature and date signed. Please include this with the next submittal. **PE stamp signed and dated.**
2. A Water Use Efficiency (WUE) program was not located in the submitted plan. Please refer to our Water Use Efficiency Guidebook (DOH 331-375) and WAC 246-290-810 for more information and include the WUE program in your second draft submittal. **The program is included as Appendix P Kelso Water Use Efficiency Program.**
3. A Water Loss Control Action Plan was not included in the submitted plan. Please see the plan requirements identified in WAC 246-290-820 and include with the second draft submittal. **The program is included in the Appendix P – Water Use Efficiency Plan.**
4. The following financial information was not located in the submitted plan:
  - i. A summary of past income and expenses (minimum 2-3years).
  - ii. A 10-year projected balanced operational budget.
  - iii. The current fee structure, when it was implemented, and how often rates are reviewed.

#### WASHINGTON LOCATIONS

Bellingham  
Bellevue  
Bothell (Corporate)  
East Wenatchee  
Richland  
Tacoma

#### OREGON LOCATIONS

Medford  
Portland

#### IDAHO LOCATIONS

Nampa



Please include financial information and projections with your second draft submittal. **The financial portion of the water system plan is included in this submittal.**

5. If the system wishes to be granted submittal exception for new distribution mains under WAC 246-290-125 then appropriate elements described in our Water System Planning Guidebook, DOH publication 331-068, must be included in the Water System Plan.

Please assure that all necessary drawings and specifications are present. See Chapter 7 in the Guidebook. **The City's standard drawings and specifications are included in Appendix F.**

## Chapter 2

6. Page 2-14, last paragraph. The draft WSP states “Not all of the City’s facilities have meters, the City will continue to install meters throughout their system as the need arises.” Please identify what City facilities are unmetered (how many and their location/connection). Also, describe how the City determines when “the need arises” to install meters. Provide an installation schedule for when the City will become fully metered. **A couple of the City’s pump stations need new flow meters as determined by field investigations and visual inspections, every water service connection is metered.**

7. Page 2-16, Retail Service Area. This section of the plan needs to be updated. See below. Per RCW 43.20.260 - Review of water system plan, requirements—Municipal water suppliers, retail service. In approving the water system plan of a public water system, the department shall ensure that water service to be provided by the system under the plan for any new industrial, commercial, or residential use is consistent with the requirements of any comprehensive plans or development regulations adopted under chapter 36.70A RCW or any other applicable comprehensive plan, land use plan, or development regulation adopted by a city, town, or county for the service area. A municipal water supplier, as defined in RCW 90.03.015, has a duty to provide retail water service within its retail service area if: (1) Its service can be available in a timely and reasonable manner; (2) the municipal water supplier has sufficient water rights to provide the service; (3) the municipal water supplier has sufficient capacity to serve the water in a safe and reliable manner as determined by the department of health; and (4) it is consistent with the requirements of any comprehensive plans or development regulations adopted under chapter 36.70A RCW or any other applicable comprehensive plan, land use plan, or development regulation adopted by a city, town, or county for the service area and, for water service by the water utility of a city or town, with the utility service extension ordinances of the city or town. Note that there is not a reference that “municipal water suppliers provide water service to all new retail customers ...” - or - “A retail service area is the area within which water is or will be sold directly to the ultimate consumers.” Retail service area is defined as the specific area defined by the municipal water supplier where the municipal water supplier has a duty to provide service to all new service connections as set forth in RCW 43.20.260 (above).



The reference to having sufficient water rights does not include “or uses water from a source that has a water right”, yet this is included in the draft WSP. Please explain why this is included and what it refers to.

Please review and update this section as needed. **This section is updated and believed to be in accordance with Chapter 43.20 and 36.70A RCW.**

8. Please revise use of demand designators to be consistent with our Water System Design Manual, DOH publication 331-123. For example, MDD reflects system-wide demand whereas ERU<sub>MDD</sub> reflects demand for an Equivalent Residential Unit. **Table 4.15 and other references to MDD have been updated to be consistent with DOH publication 331-123.**

## Chapter 4

9. Page 4-8 and Table 4.10 – Water Supply. Please provide monthly and annual water production for each source. Include the intertie with the City of Longview as a source in Table 4.10. If no water was provided from the intertie, please identify as ‘0’ for the monthly production. **New Table 4.11 shows the monthly production records.**

10. Page 4-9 – Distribution System Leakage. Water main breaks are not considered authorized consumption and must be included in DSL. Please update the description to clarify that water main breaks are not authorized consumption and are included in DSL. Update Chart 4.3 to show that water main breaks are not authorized consumption but part of DSL. Update Table 4.11 (and other tables as needed) to include water lost through water main breaks as DSL and not authorized consumption. **The AC shown does not include DSL Chart 4.3.**

## Chapter 6

11. Page 6-14, Per- and Polyfluoroalkyl Substances. In 2021, the WA State Board of Health adopted State Action Levels (SALs) for PFAS. The rule requires all community and NTNC public water systems to test for PFAS. Please update this section. For current information, see our PFAS website: PFAS in Drinking Water—Monitoring and Analysis | Washington State Department of Health. **Chapter 6 has been updated, and the updated section is included.**

## Chapter 7

12. The Plan indicates adequate capacity to meet demands through 2030 but a deficit (source capacity) to meet demands through 2040. Please clarify when the system is projected to have demands that exceed capacity, and how planned improvements affect future capacity and the ability to meet projected demands. Approval for an unspecified number of connections requires that adequate capacity is maintained through a combination of existing capacity and a credible capital improvement plan and budget for the Plan’s approval period. **The system demands are expected to exceed the to exceed the by 2038. The City’s improvements program is scheduled to have additional supply online by 2035 to resolve this deficiency in supply capacity. The supply capacity is shown to be 17,156 ERUs which will be exceeded in 2038 as shown in Table 4.18.**



13. Please verify that all capacity calculations include water loss from main breaks as DSL. **The DSL includes water main breaks.**

## Appendices

14. App A – Water Facilities Inventory (WFI) Form. The WFI included in App A was last updated 10/24/19. To update the WFI, print the form and cross out the items needing to be updated, use a pen to write in updated values, sign, and date the form, and include in 2nd draft submittal. **An updated WFI is included as Appendix A.**

15. App B – Adjacent Purveyors and Agency Review Comments. The letters included in this appendix are from the 2012 WSP update. Please include confirmation of current notifications to adjacent utilities (City of Longview, BHWSO, Carrolls Water Association, DTWA) and completed Local Government Consistency Forms (LGCF) from the City and County planning departments. **Emails sent to Longview, BHWSO, Carrolls, and DTWA are included in Appendix B.**

16. App D – DOH Checklists and Correspondence. The only item found in this section is the DOH correspondence following the 2012 sanitary survey, which is also included in App H – Sanitary Survey. I suggest removing the sanitary survey from App D. **Corrected, Appendix D has been removed.**

17. App I – Water Quality Monitoring Plan. Please update the source monitoring schedule and include an updated Water Quality Monitoring Schedule in the second draft submittal. Note the requirement to test for PFAS as noted in a previous comment. **Updated WQMP with current Water Quality Monitoring Schedule included with Appendix I.**

18. App N – Cross Connection Control (CCC) program. The CCC program was not included in App N and was not located in the submitted plan. Please include the CCC program in the second draft submittal. **Updated CCC program included in Appendix N.**

19. App O – SEPA Determination. The pre-plan checklist identifies the SEPA environmental checklist and determination as being included in App O. The WSP submittal did not include an App O, and SEPA documentation was not located in the submitted plan. Please include SEPA documentation in the second draft submittal. **SEPA checklist and determination included as Appendix O.**

## Other

20. Figure 2.6 – Water Service Area. The water service area, represented by a light blue line, is not a continuous boundary. The retail service area (where the water system has a 'duty to serve') is not identified. Please clearly show the service area, with a continuous boundary line. If you need to remove the city limits line in to clearly show the service area boundary, please do. Please clearly identify the retail service area. If the water service area boundary and the retail service area boundary are the same, please identify that on the legend and in the narrative of the WSP. The water rights place of use would include the service area and where wholesale water is provided (see page 4-1). **Figure 2.6 has been updated and included.**



21. The Department of Ecology has issued a comment letter regarding this submittal. Please respond to Ecology addressing any issues contained in their letter and include your response in the second draft submittal. **The Ecology comments have been addressed.**

22. When all DOH comments are addressed and DOH is ready to approve the document, we will notify you via email. 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. **Meeting minutes from City council approval included in Appendix xx.**

If you have any questions regarding the responses, please call me at (253) 393-2964 or via email at [jribail@rh2.com](mailto:jribail@rh2.com). Thank you for taking the chance to review the City's Water System Plan.

Sincerely,

**Jared Ribail**  
Project Engineer  
HS/AM

Signed: XX/XX/XX

Attachments: