

NORTH CITY 
Water District

1519 NE 177th St. • P.O. Box 55367 • Shoreline, WA 98155 • Phone: 206.362.8100 • Fax: 206.361.0629

Commissioners:

Ron Ricker

Charlotte Haines

Larry Schoonmaker

District Manager:

Diane Pottinger, P.E.

July 6, 2014

Via Email

Miranda Redinger
Department of Planning & Community Development
City of Shoreline
17500 Midvale Ave N
Shoreline, WA 98133-4905

RE: Draft EIS for the 185th Street Station Subarea Plan
& future EIS for the 145th Street Station

Dear Ms. Redinger:

Thank you for allowing us an opportunity to comment on the Draft EIS for the above referenced project. Our major comment/concern is the large number of errors/incorrect assumptions about the North City Water District that are included in this draft EIS. This could be corrected/updated with a sit down meeting with our utility. This open dialogue, in person, will save considerable staff and consultant time as the City plans for development of the new transit stations.

Other than the public notice that recently went out by the City of Shoreline, our utility has not been contacted by the City to provide comments or suggestions about any draft plan. To date, District staff members have been doing utility locates for Sound Transit for many weeks. We are aware the agency is considering several alignments, width alternatives, and different facility size locations associated with the light rail station projects. Depending on which options are selected, the project could impact the water service to our District. For example, the District's new Supply Station 4 completed in 2012 appears to be at the entrance to the proposed parking garage in Sound Transit's preferred alternative route for the Lynnwood Link. Relocating that station and dealing with dead end lines on some existing water mains would be very expensive. . The costs of these options will be provided to Sound Transit as part of their design consideration for this station, but estimates should be considered now

The following errors should be corrected in the final EIS and are listed by page:

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Page 3-199:

- The text has several references to 509 pressure zone. It should be the 590 pressure zone. Obviously, there is an 89 feet pressure difference between a 509 and a 590 pressure zone.
- Reference is made to table 3.5-1 and a 2030 projected system deficit of 378 gpm. Attachment 1 is the upgraded contract North City Water District has with SPU as of March 2013. The contract supply limit is now 3330 gpm and all references to water supply need to be changed to reflect this new contract amount. We do not have a deficit with our contracted supply. The final paragraph on this page discusses a deficiency in source capacity which is no longer accurate and should be deleted.

Page 3-200:

- Table 3.5-1 needs to be changed to reflect the new source of supply and correct the deficit amounts
- Improvements 1, 2 and 3 have all been completed since the Water System Plan Update was adopted by the District. CIP #14 was completed in 2012. Items 2 and 3 were completed in 2013 and are shown in Attachment 1.

Page 3-201:

- North City Water District owns two reservoirs in the area which contain 5.7 million gallons. We demolished our 0.4 mg reservoir in 2011.

Page 3-202:

- The storage deficiency was corrected with the contract approval with the attachment 1. This allowed the District to have two different water sources, thus decreasing the required storage. This reference needs to be updated.
- The pressure zone is identified as 509 but should be 590 zone.
- The third paragraph, first sentence is incorrect. We did not install a 3rd booster pump station. We installed a 4th supply station. Second sentence should be changed to read "With the two booster pump stations and the new supply station,.... The reference in the last sentence to our contractual amount is incorrect. As shown in Attachment 1, we have 3330 gpm we can withdraw from SPU. How and where we do that is up to us to decide.
- 4th paragraph second column, last sentence is incorrect. It should read, in order to ensure adequate fire flow within the system, prior to starting a new development, the applicant is required to apply for a Certificate of Water Availability. Once the application is complete and the fees paid, the District will conduct a Fire Flow Analysis using a computer hydraulic model to determine the amount of flow and pressure available at the property in question. If the result of the analyses indicates there is sufficient fire flow, the Certificate of Water Availability will be issued to the property owner. If the result of the analyses indicates there is insufficient fire flow, improvements will be required.

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Page 3-203:

- In the first paragraph, the number of customers west of I-5 is indicated as small. The District has over 100 customers west of I-5. Need to remove reference to “small” .
- Table 3.5-3 identifies "Shoreline Water District." It should be changed to "North City Water District." Also, here is information for 2011 and 2012..

	2011	2012
North City Water District	140	139
Wholesale Average	165	172
Seattle	128	130

- The reference for commercial water use in a study completed by Pacific Institute is great but we would recommend you ask us for actual commercial customer information. As a member of the Seattle Operating Board, we are well aware of how the commercial water use patterns change, within the Seattle regional system. A local number would be more appropriate.
- In the second paragraph down, there is a reference to "North Creek Water District." Our name is "North City Water District."

Page 3-216:

- Paragraph 2. As shown in Attachment 1 and discussed earlier, our contractual requirements are 3,330 gpm for all of our water sources from SPU.

Page 3-218:

- Alternative 2, second sentence. Reference is made to the 30” transmission main. This steel main was installed in 1955 and its age should be considered in light of future development. It may require replacement at some time. We do not have information about any problems with the line as it is owned by SPU; coordination should be made as to the timing of the replacement of this line.
- Table 3.509, last row heading should be “Total of Both Water Systems” not “Districts” as shown.

Page 3-219:

- First paragraph, reference TAZ 38. While this TAZ is between the SPU and North City Water District water systems, it is still within the SPU service area. Any and all improvements made to TAZ 38 should be made in coordination with SPU.
- Second paragraph, second sentence. In order to adequately provide fire suppression, these mains “may” need to be upsized, not "will" be upsized.

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The amount of upsizing of the mains will not be known until an extensive hydraulic modeling is done of the area.

- Alternative 3 – Most Growth. The same comments as mentioned previously regarding the age of the 30” transmission main should also be discussed here. Depending on the maintenance information of this line, it may need to be replaced when all the laterals will also be replaced. All references to TAZ 38 should be made referencing SPU.

Page 3-222:

- Capital projects item 1a – the pump station project is expected to start in the fall of 2014 and will take 15 months.
- Capital projects item 1b – this project has been completed.

Page 3-223:

- Item 2, paragraph starts midway through the page then continues to column 2. After the following paragraph, the discussion continues back at column 1. It is very confusing.
- Item 3 was completed in 2012. However, with the proposed design by Sound Transit, this recently-completed capital project will have to be relocated elsewhere west of I5.

Page 3-224:

- Item 4 was completed in 2013 as part of a public private partnership with a developer.
- Item 6 is identified to be completed in 2026. However, as capital projects are constructed, the district will look at each of the dead end fire hydrants to determine if we can incorporate a hydrant replacement as part of another project. In that case, the projects will be built before 2026.

Page 3-230:

- Table 3.5-12 identifies 491 feet of 12 inch main to be replaced. This was completed in 2012 and therefore, the table should reflect 0.
- In the end of the following paragraph, this same project was completed and should state that.
- Last sentence in the following paragraph refers to “rezoning alternative”. Public water systems are not designed to meet zoning requirements. They are designed to meet the land use type. If we were to design to a particular zoning, the water system could be upgraded to first an 8” water main, then potentially something larger like a 12” water main when the zoning is changed a second time. It is not cost effective for the rate payers to pay to install then upgrade the water main twice simply because the zoning changes. The District will consider the potential future project improvements when the land use is adopted and when our water system plan requires updating. If the City or a developer would like to have us do the hydraulic modeling sooner, we may be able to accommodate that through a

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financial arrangement. However, any projects identified will have to be adopted as part of the planning process to be able to use public funds.

Page 3-231:

- The first paragraph references the quantity of water mains that are expected to be upsized. This may not be required but until an extensive hydraulic modeling analysis is completed, we cannot be sure.
- Alternative 3: the first two references for the TAZ 24 and 26 should be TAZ 124 and 126.
- In the last sentence on the same paragraph, there is a reference to “storage reservoirs serving the community”. When there is a large demand change such as what the City is considering, the reservoirs servicing each “pressure zone”, not “community” needs to be evaluated. Reservoirs such as the Richmond Highland Tanks in the SPU area are the only reservoirs in the SPU system for the 590 zone which extend far beyond the proposed transit station.

In the District’s current water system plan, there are several projects that were identified in the 10 year CIP that are located in the subarea which we have been able to complete or are in the process of completing. This acceleration in our CIP can directly be attributed to our public private partnerships and the Drinking Water State Revolving Fund loans we recently obtained. With the exception of some dead end water mains that we will evaluate in the future, we will have no capital projects that will be required under Alternative 1 – No Action, Existing Zoning Map.

We have not undertaken the expensive hydraulic modeling that would be required to determine the cost of the capital projects required to meet the land use for Alternative 2 and 3. If the new land use is adopted in the next several years, when the District updates its water system plan, we can calculate the cost at that time. The modeling effort not only identified which areas need what improvements but it also identifies a schedule in which the improvements should be made to have the least impact on the ratepayers and the developers. The district can’t upsize a main for future development too early, otherwise we could run into significant water quality concerns for our existing customers.

To reiterate, I would suggest that some members of the City staff meet with both SPU and North City Water District to discuss these proposed changes to the City’s land use which could simplify the draft EIS that we are currently reviewing. We can eliminate a substantial amount of information included in the final EIS that is unneeded, and more accurately look at the impacts of the alternatives. Thank you for considering our comments.

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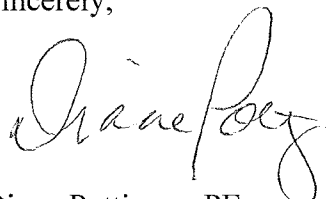
Charlotte Haines

Larry Schoonmaker

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Sincerely,



Diane Pottinger, PE
District Manager

cc: Andy Maron, District Attorney

Attachment 1



City of Seattle
Seattle Public Utilities

March 13, 2013

Diane Pottinger, District Manager
Shoreline Water District
P.O. Box 55367
Seattle, WA 98155

Re: Modification to Exhibit II of Wholesale Water Supply Contract:

Dear Ms. Pottinger:

Diane

Attached is the revision to Exhibit II of the Full Requirements Contract for the Supply of Water to Shoreline Water District. The revision reflects the additions of Stations 191, 193 and 194. Stations 193 and 194 are also listed in Exhibit C of your Wheeling Water Agreement.

Please sign the two letters in the space below, keep one for your files and return the other signed letter to me to indicate you acknowledge and accept the new version Exhibit II.

Thank you and if you have any questions, please contact me at (206) 684-7975.

Sincerely,

Terri Gregg
Wholesale Contracts Manager

Diane Pottinger, District Manager
Shoreline Water District

Ray Hoffman, Director
Seattle Public Utilities
700 5th Avenue, Suite 4900
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**CUSTOMARY POINTS OF DELIVERY, MINIMUM HYDRAULIC GRADIENTS,
AND MAXIMUM FLOW RATES OF WATER SUPPLIED**

METER SERVICE		PIPELINE SEGMENT NUMBER ⁽¹⁾	SIZE OF METER (IN.)	MINIMUM HYDRAULIC GRADIENT FOR PLANNING PURPOSES AT STATION UPSTREAM OF METER (FEET NAVD-88 Datum)	MAXIMUM FLOW RATE UP TO WHICH THE MINIMUM HYDRAULIC GRADIENT APPLIES (gpm) ⁽²⁾
LOCATION	STATION NUMBER ⁽¹⁾				
8 th Ave NE & NE 160 th Street	101	7	10	505	805
16 th Ave NE & NE 192 nd Street	102	7	10	520	735
32 nd Ave NE & NE 195 th Street	103	7	6	525	Backup to Sta. 191
8 th Ave NE & NE 185 th Street	104	7	8	515	965
NE 195 th St & 40 th PINE	191	7	8	520	325
5 th Ave NE & NE 185 th Street ⁽⁴⁾	193	7	8	510	500
8 th Ave NE & NE 185 th Street ⁽⁴⁾	194	7	8	515	Backup to Sta. 193
TOTAL:					3,330

Notes:

- (1) Station and Pipeline Segment Numbers pertain to the demand metering program.
- (2) City of Seattle's estimate of Water Utility's average daily demand for 2020 with a peaking factor of 2.0 for peak day.
- (3) All Points of Delivery provide a wholesale level of service. Seattle bears no responsibility for retail service level obligations, such as fire flow or emergency backup.
- (4) This station is subject to a wheeling agreement, and is not physically located at this address. Water is wheeled from this location of the regional system to the location identified in the wheeling agreement, as provided for in it.