



City of  
**OLYMPIA**

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May 12, 2010

Ms. Clydia Cuykendall  
League of Women Voters of Thurston County  
Water Resources Subcommittee  
1063 Capitol Way S., Suite 212  
Olympia, WA 98501

Dear Ms. Cuykendall:

**SUBJECT: LWVTC Comments on City of Olympia 2010 Comprehensive Plan Update**

Thank you and the other members of the League of Woman Voters of Thurston County (LWVTC) for your comments on the water resources elements of the City's Comprehensive Plan. We appreciate the extent and thoughtfulness of your comments.

Since we are still in the scoping phase of the Comprehensive Plan update, our responses below are generally framed about how these issues may be folded into the plan update. In some cases, the issues you raise have already been addressed in utility master plans and therefore need to be "rolled up" into the Comprehensive Plan update. We point these out below. Other comments seek to push the City further in various areas, and we share some initial thoughts on how this might be best addressed in the plan. Our responses below are organized by the following categories: General, Drinking Water/Water Supply, Wastewater, Storm and Surface Water and Climate Change.

#### **General**

We agree that water resources issues are best managed in a holistic, regional manner. Water quality and quantity issues in our region are not confined to individual jurisdictions and therefore require regional solutions. Much of what we do in our work on water resources involves coordination and collaboration with other local jurisdictions.

In this vein, Olympia has increasingly taken regional approaches with the cities of Lacey, Tumwater and Yelm to find solutions to regional water supply challenges. This includes the acquisition of the former Olympia Brewery water rights and joint implementation of water rights mitigation. In 2008, Olympia also reached a historic agreement with the Nisqually Indian Tribe to jointly develop the McAllister Wellfield. In addition, the City continues to work regionally with the LOTT Alliance on furthering the use of reclaimed water in our region. Reclaimed water use helps to both stretch our precious potable water sources and reduce discharges to Budd Inlet. These regional efforts towards sustainable water supplies are working and will continue.

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Olympia is also engaged in regional partnerships to improve water quality conditions in Puget Sound through such efforts as the Budd Inlet Restoration Partnership, Deschutes TMDL (Total Daily Maximum Load) process, and the Henderson Inlet Shellfish Protection District. Further regional efforts are needed to improve surface water quality and aquatic habitat in our region, and the City is open to exploring different models and approaches. Integrating shoreline management and climate change in these efforts is also critical and we will look at opportunities to make this connection within the plan.

Focusing on Olympia's organizational structure, the intent behind Olympia's Water Resources line of business (water, storm and surface water and sewer utilities) is to work towards better coordination and integration of water related functions within the City. Olympia currently houses the Groundwater Protection Program within the Drinking Water Utility and those goals and strategies are clearly laid out in the City's Water System Plan.

### **Drinking Water/Water Supply**

Your paper raised several comments regarding water supply management and our drinking water utility planning and programs. Our responses are listed below:

- We agree that exempt wells create a unique water resources management challenge, and that the impact of these well withdrawals is difficult to evaluate. At this time, local jurisdictions are limited by state law regarding how they can regulate exempt wells. The City of Olympia is currently researching this topic, coordinating with other utilities and jurisdictions, and following state legislation on this issue.
- We agree about the important linkage of water availability and population forecasting, the need to consider the effects of climate change on water supply, and the importance of protecting in-stream resources. One of the five goals in Olympia's Water System Plan is "Provide adequate supplies of water for future needs while protecting in-stream flows and sustaining long-term capacity of aquifers." In our most recent Water System Plan, we went above and beyond state requirements to plan for water supply and demands on a 50 year horizon. This is consistent with Policy 6.1 under Goal 6 in the current Comprehensive Plan that states "Reserve water supply rights for at least 50 years in advance of need, so that supplies can be protected from contamination or commitment to lower priority uses. (Ord. #6517, 12/23/07) "
- Our most recent Water System Plan also for the first time evaluated potential effects of climate change on water demand patterns. Further evaluation is needed over time. On the supply side, very little is known in the scientific community about the impacts of climate change on groundwater supplies like those used by Olympia. The focus of the scientific community has been on community supplies from rivers and streams that rely on snowpack runoff. Impacts are already being felt in these communities. We will continue to watch both the supply and demand side science as it evolves.
- Regarding in-stream resources and impacts of new supply development, the City has made substantial investment in a groundwater model designed to predict these potential impacts from the development of our McAllister Wellfield. This information is carefully scrutinized by the Washington State Department of Ecology as they consider our proposed water right

applications. Where mitigation is needed, the City is working regionally to develop and implement responsible mitigation projects to offset predicted impacts to in-stream resources.

- Thank you for your suggestions on how we might consolidate goals and policies in the area relating to Drinking Water in Chapters 2 and 5.
- We will be updating the Comprehensive Plan goals and policies to align with our Water System Plan, including those related to peak demand and outdoor conservation. Our target for outdoor conservation is to reduce outdoor water use by 13.6 million gallons per year by 2014.
- Our current water rates are designed so that customers pay the full, equitable cost of water services. Our rates use marginal cost pricing principles that ensure that those who use the most water - especially during summer peak periods - pay the higher cost of delivering water during those times. Our conservation program provides technical assistance to outdoor water users on water efficient landscaping and irrigation practices. We only *restrict* summer watering under emergency situations such as a severe drought. We also have a utility bill which shows a graph of customers water use throughout the year, to help them adjust their water use as needed to save money.
- We are in the process of working with the LOTT Alliance to expand opportunities for using reclaimed water. We are also currently examining code changes that would require hook-up to reclaimed water if users are adjacent to purple pipe and significant potential exists for reclaimed water use.
- We have recently updated our Drinking Water Protection Area (DWPA) ordinance to limit lawn area to 25% of the total landscaped area, and require that the remaining landscaped area use drought tolerant and/or native plants in all new developments. This code only applies in designated DWPA's. Other codes encourage the use of these plants in new developments outside DWPA's, but do not require it. This should be further evaluated in the future.

In summary, we believe our current water supply planning and programs are consistent with the vast majority of your comments. We intend to bring the Comprehensive Plan up to date with our utility planning so that these connections are more apparent.

### **Wastewater**

You provided a very good overview of City's current wastewater planning and programs, and the challenges we face. We believe the City's wastewater planning took significant steps forward with the adoption of the 2006 Wastewater Management Plan.

- We support your goal of encouraging reuse of wastewater treatment byproducts. We will share comments with the LOTT Alliance for their long-range planning.
- We agree with your goal of ultimately replacing on-site septic and STEP systems with gravity sewer service. This is consistent with current Comprehensive Plan policies (see PF 14, 15 and 16). In addition, our current codes substantially restrict new septic and STEP systems and existing programs support conversion over time. Given the high costs of conversion, however, this will be a very long-term effort.
- The current Comprehensive Plan also supports the separation of combined sewers in coordination with stormwater or road projects. The high cost of separating combined sewers

has led to this more opportunistic approach. The Wastewater Utility's near-term priorities focus more on extension of the regional sewer system into unsewered areas and replacement of aging, failing infrastructure. The Wastewater Utility will evaluate further separation of combined systems in future updates of the Wastewater Management Plan.

- The City supports the goal of monitoring existing septic system performance. Under state law, the City does not have direct regulatory authority over septic systems. This is under the jurisdiction of the County Board of Health. The City does plan, however, to further our coordination with the County and see if their successful approaches in the Henderson Watershed can be expanded to other areas.

### **Storm and Surface Water**

Our responses to your comments are organized according to your proposed goals: Low Impact Development/Alternative Road Designs, Cluster Development/Open Spaces, Green Infrastructure Retrofits, and Culverts.

#### Low Impact Development/Alternative Road Designs

Your comments suggested that the City pursue low impact development (LID) and alternative road designs in all City development and re-development projects. We believe the City has been a leader in these areas through the adoption of LID standards in the Green Cove Basin and in application of low-impact, alternative roadway and sidewalk designs on City projects. For example, the City recently implemented a demonstration project on Decatur Street SW piloting three different alternative roadway designs. The goal of the project is to find reliable approaches to managing stormwater within the road right-of-way and thereby eliminate runoff. We continue to gather and evaluate data on the project that will help inform designs on future projects.

Staff believes that low impact development increases our ability to protect surface water quality and reduce environmental impacts in our urbanizing area. LID approaches also come with risks. LID projects that fail due to design flaws or lack of maintenance can result in increased flooding and impacts to streams. As a result, application of LID approaches requires more staff oversight and upfront thought over how to mitigate risks. We agree that we should pursue LID techniques whenever risks can be adequately mitigated, and that our goal should be to move to LID in all public and private projects over time. We will continue to seek innovation and pilot new approaches as in the case of Decatur Street SW.

#### Cluster Development/Open Spaces

We agree that cluster developments are an effective way to achieve density while protecting sensitive habitat in an urbanizing area. This approach has been employed with some success in the Green Cove basin.

Preservation of open space and encouraging density are just one of a number of competing policies that must be balanced as we work our way through this update of our Comprehensive Plan. We look forward to continuing this dialogue as we move forward with the update.

The City has implemented efforts to secure open space for parks and critical habitat protection, and could do more. We will look at opportunities to strengthen language within the plan.

Green Infrastructure Retrofits

The Storm and Surface Water Utility is currently working on an update of its 2003 Storm and Surface Water Master Plan. This plan update, to be completed in 2010-2011, will include an evaluation of incentives for retrofit of green roofs, rain gardens, porous pavements, etc., in existing developed areas.

Culverts

We agree with your goal to reduce the use of culverts whenever possible and will look to incorporate this more clearly into the plan. Studies have shown that road crossings produce some of the most deleterious effects on overall stream health.

**Climate Change**


Thank you for your comments on Climate Change and Sea Level Rise. These are issues that will be discussed in more detail as we move from the visioning stage of our update process to the more focused discussion of topical areas.

The City has indeed done some significant research in beginning to understand the implications of both sea level rise and climate change on the city. These efforts will be incorporated into the update of the plan. New goals and policies will likely flow out of this work and be included in the plan.

I invite you continue your active participation in the update process and look forward to working with the League as we begin the more focused work of the update.

Thank you again for your thoughtful comments on the City's Comprehensive Plan Update. We look forward to continued dialogue with your group as we progress in our process.

Sincerely,



**KEITH STAHLEY**  
Director  
Community Planning and Development Department



**RICHARD T. HOEY, P.E.**  
Director of Water Resources  
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