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Department of Health
DIVISION OF DRINKING WATER
Lexington Environmental Engineering Field Office

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May 13, 2002

SUBJECT: Albemarle County
Water – Rivanna Water and Sewer Authority

Mr. Richard Collins, Chairman
Rivanna Water and Sewer Authority
P.O. Box 18
Charlottesville, Virginia 22902

Dear Mr. Collins:

We have reviewed with interest the many documents presented concerning the future water supply alternatives for the Albemarle County Urban Area and City of Charlottesville being considered by the Rivanna Water and Sewer Authority Board of Directors. The alternatives being considered include a wide range of options and the board should be commended for their long-term vision and the comprehensive manner in which these all important decisions will be made. Staff from this Department has attended several public meetings and noted the general feelings and comments.

After reviewing the available information and noting the public comments, we find that one very important consideration has been absent from all of the discussions and comments. That important consideration is the quality of the raw water.

This Department encourages waterworks owners to utilize the best available raw water source. This is reflected in the Commonwealth of Virginia *Waterworks Regulations* (12 VAC 5-590-820) which states in part "*preference shall be given to the best available sources of supply which present minimal risks of contamination from wastewater and which contain a minimum of impurities that may be hazardous to health*". Additionally, the 1996 Safe Drinking Water Act Amendments and US Environmental Protection Agency has placed greater emphasis on source water protection and preventing contaminants from entering water supplies in lieu of the past practice of removing contaminants at water treatment facilities. This emphasis on source water protection is becoming even more important as finished water quality requirements become ever more stringent.

With the issue of raw water quality in mind we would offer the following comments pertaining to the RWSA's future water supply alternatives:

1. Many of the comments presented at the public meetings were related to flow augmentation in Moormans River. Most of the comments were very much in favor of the Mechums River pump station alternative in that, if constructed and utilized, would allow a greater release from Sugar Hollow Reservoir. While we understand and appreciate the concerns of flow in the Moormans River, the fact is, Sugar Hollow Reservoir provides the best raw water quality of all of the current water supplies. The Sugar Hollow watershed is located within the Shenandoah National Park, is void of development, and is less susceptible to contamination. **Sugar Hollow represents an excellent raw water source and the Department would encourage its maximum utilization.**

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2. As required by the Safe Drinking Water Amendments of 1996 the Virginia Department of Health is conducting source water assessments for all source waters in Virginia. These assessments include onsite evaluations of all activities within a watershed that may pose a threat of contamination. We have completed these assessments for all of the RWSA's water supplies including Sugar Hollow Reservoir, Ragged Mountain Reservoir, South Fork Rivanna River Reservoir, North Fork Rivanna River, Totier Creek Reservoir, and Beaver Creek Reservoir. All of these water supplies have been rated as highly susceptible to contamination except Sugar Hollow/Ragged Mountain, which was rated as moderate.
3. Due to the interest in an intake on Mechums River, we have initiated a detailed source water assessment for this location. However, since we have completed the source water assessment for the South Fork Rivanna River Reservoir watershed, which includes the Mechums River intake, the resulting assessment will rate this location as highly susceptible to contamination.
4. The Department supports the Buck Mountain Reservoir as the best long-term water supply alternative. This support is based upon the belief that Buck Mountain will provide excellent source water quality.
5. The Department does not support the Upstream Base Flow Augmentation with Highly Treated Wastewater alternative as this will not result in the best quality water source.
6. The Department supports and encourages the water conservation efforts of the Albemarle County Service Authority and the City of Charlottesville and the continued efforts to protect the existing water supplies in Albemarle County.

In summary we urge the RWSA Board to include consideration of the quality of the source water in recommending short and long-term water supply solutions. The *Waterworks Regulations* dictate that this issue be given primary consideration and is the interest of public health protection. If you have any questions please contact Mr. James W. Moore III, P.E. at (540) 463-7136.

Very truly yours,



Ronald E. Conner, P.E.
Field Office Director

JWM/mep

cc RWSA – Attn: Mr. Lawrence Tropea
ACSA – Attn: Mr. Bill Brent ✓
City of Charlottesville – Attn: Ms. Judith Muller
Albemarle County Executive – Attn: Mr. Robert Tucker
Albemarle County Health Department - Attn: Dr. Susan McLeod
VDH – Division of Drinking Water

Summary of Notes

Pre-Application Meeting

10:30 am – 2:30 pm

Wednesday, June 22, 2005

USGS Virginia Science Center, Richmond, VA

Tom F – Introduction, thanks for coming, presentation first, then discussion. Feedback from regulators strongly encouraged, we want this process to be a model for others to follow on water supply projects with an involved public.

Aaron K and Nancy B – Summarized alternative concepts

Peter (EPA) – What's basis for 0.2 ac wetland impacts on James River? Neville – Field Surveys

Mike S (Corps) – What is size of James R pipeline? Aaron – 30 inches, in a 20 ft right-of-way

John K (DGIF) – Would you pump from James to Ragged Mtn? – Aaron – yes, but must count on existing storage with James alternative; also must rehab Ragged Mtn with any alternative

Mike S – Would there be a need to increase storage of Ragged Mtn with James alternative? Aaron- raise dam only by 3.2 feet to restore what was lost from upper dam after rehab

John K – If build James, do you will transfer from Sugar Hollow? Aaron – No, Sugar Hollow would be phased out; could be retained only for emergency

Jim B (Corps) – Would you operate James pipeline constantly, or just when needed? Aaron – would not have to run constantly, but it would have to be exercised on a regular basis.

Jim M (VDH) – VDH would require it be run several hours per month

Joe H (DEQ) – Does Ragged Mtn Expansion have any wetland impacts beyond the first 3.2 ft fro rehab? Aaron – No

Jim M (VDH) – Need to point out one negative with Ragged Mtn expansion w/ SFRR pipeline. Raw water quality would degrade. Ragged Mtn now has the best source water on RWSA's system, because it comes from natural watershed and Sugar Hollow. SFRR water quality has problems, particularly summer algal blooms.

Dennis R – Isn't that also true of James River? Jim M – I'm not convinced James River water is equal to or inferior to SFRR

Mike S – Is 10,660 linear feet of stream impact on Ragged Mtn associated with expansion beyond the 3.2 feet? Aaron – Yes

Tom F – Summarized community concerns – 6 public meetings, 2 joint board meetings, speakers bureau, etc. Public meetings included a facilitator to maximize cross-section input and keep certain individuals from dominating mic – information was two way, we attempted to educate public on process – “least environmentally damaging ...” theme used often. In summary, business community strong advocate for project purpose (add 9.9 MGD supply) but willing to consider technical arguments for best alternative. Prior to March 3, “environmental” groups more focused on specific