

ATTACHMENT 1

From: Rayno, Don <don.rayno@ncdenr.gov>
Sent: Friday, October 10, 2014 4:14 PM
To: froyal@pittsboronc.gov
Cc: 'Stuart Bass'; bryan.gruesbeck@gmail.com; Becky Smith; Fransen, Tom
Subject: RE: Town of Pittsboro's Draft Allocation Application

Fred,

On the whole the quality of draft applications we received was very good and covered the critical items that must be addressed in applications. Since the rules specify what needs to be included in application it will benefit all applicants and the DWR staff if the rule requirements are reviewed once again and specifically addressed in the final applications.

In the process of reviewing Pittsboro's draft application I also reviewed sections of the documentation submitted to the town to support the Chatham Park project.

In response to your email inquiry I reviewed Pittsboro's draft application, again, and came up with a couple of details that should be clarified to facilitate the review of the final application by DWR and members of the public who will have access to the final applications and opportunities to comment. I noted a couple of items that would improve consistency between documents.

The contract commitment with Chapel Ridge is noted in the draft application but no contract information is included in the "Water Sales" section of the 2013 LWSP I downloaded a couple weeks ago.

The information for Pittsboro's WTP wastewater discharge to the Haw River in the LWSP shows "0.00" for the permitted capacity. The wastewater discussion in Sec III of the "Chatham Park – Planned Development District Master Plan" date May 3, 2013 implies that the town has a NPDES permit for a discharge of up to 2.47 mgd to the Haw River, presumably in reference to the WTP permit. Including any volume limit included in that permit in the LWSP would improve consistency among the relevant documents, or as an alternative include an appropriate note in the LWSP.

On page 29 of the draft application there is a reference to Pittsboro's existing intake/withdrawal permit of 3 mgd from the Haw River and a WTP permitted capacity of 2 mgd. Can you clarify the distinction between these two numbers? For instance, is the 3 mgd related to the intake capacity, or some other infrastructure limit?

The water supply allocation process is limited to granting permission to use water from Jordan Lake. There are many other infrastructure and permitting requirements to be addressed by allocation holders in order to utilize an allocation. While the allocation decision will be made based on documented need, the disposition of used water does get some attention during the review process. A large component of Pittsboro's water supply need is linked to Chatham Park. The discussion about how wastewater will be handled in the Chatham Park development is not well developed in the master plan document. The master plan estimates a potential to generate 4.8 mgd of wastewater at build out and discusses producing about 2 mgd of reclaimed water for use within the development. Is there any more clarity about Pittsboro's possible involvement, or non-involvement, with collection and treatment of wastewater from this development? This question has come up in internal reviews of the draft plans and I expect will surface again during public review of the applications and our recommendations to the EMC. Any additional information will be helpful for our review and preparation of the documentation to support recommendations to the EMC.

I will be out of the office until after October 21st and unreachable.

I will be available to discuss these and any other issues related to the Jordan Lake allocation process after that date.

[You may also contact Tom Fransen if you have questions.](#)

Don