

**Source Water Protection Plan
for
Town of Dillon, CO
CO0159035
Surface-Water Source**

Summit County, Colorado

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*Never doubt that a small group of thoughtful, committed citizens
can change the world; indeed, it's the only thing that ever does.*
– Margaret Mead

When the well is dry, we know the worth of water

– Benjamin Franklin

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EXECUTIVE SUMMARY

The potential financial and water supply risks related to the potential contamination of one or more of the community's water sources are a concern to the Blue River Watershed Source Water Protection Plan Steering Committee. As a result, the Blue River Watershed Source Water Protection Plan Steering Committee believes the development and implementation of a source water protection plan for the Town of Dillon can help to reduce the risks posed by potential contamination of its water sources. This source water protection plan was developed to prioritize source water protection concerns and to identify local source water management approaches that can be implemented to protect the source water. The source water assessment results supplied by the Colorado Department of Public Health and Environment were used as a starting point in developing the source water protection plan.

The Blue River Watershed Source Water Protection Plan Steering Committee recommends adopting a source water protection area that is similar to the source water assessment area defined by the Colorado Department of Public Health and Environment. The source water protection area defines the region where Dillon has chosen to implement its source water protection measures in an attempt to manage the susceptibility of their source water to potential contamination.

The Blue River Watershed Source Water Protection Plan Steering Committee (BRWSWPPSC) adopted a two-step strategy recommended by the Colorado Department of Public Health and Environment for prioritizing the water sources and potential contaminant sources on which source water protection measures will be focused. The first step of the strategy prioritizes the water sources based on their total susceptibility and/or physical setting vulnerability scores/ratings, while the second step prioritizes the potential contaminant sources based on (1) their prevalence, (2) the potential threat they pose, or (3) how prevalent and threatening the potential contaminant sources are. In applying this strategy, the Steering Committee recommends focusing source water protection measures on Straight Creek watershed including Laskey Gulch and the most prevalent and threatening dispersed contaminant sources contained in the source water protection area for this water sources.

The BRWSWPPSC reviewed and discussed several possible source water management approaches that could be implemented within the source water protection area. These management approaches may help reduce the risks of potential contamination from the prioritized potential contaminant sources. The purpose of voluntarily implementing source water management approaches is to apply an additional level of protection to the drinking water supply by taking preventive measures at the local level (i.e., county and municipal level) to protect the source water. The BRWSWPPSC established certain acceptance criteria as part of identifying and selecting the most feasible source water management approaches to implement locally. The BRWSWPPSC recommends the following list of source water management tools to be implemented by the Town of Dillon:

- Improve I-70 Spill Notification Procedures
- Implement Appropriate Actions in Coordinated Resource Management Model
- Reassess Emergency Power Arrangements
- Reassess Public Emergency Notification Procedures
- Reevaluate Water Facilities Security Arrangements

The BRWSWPPSC estimates that it will cost approximately \$1.78 million in time and materials to implement these management approaches if additional treated water storage capacity and an emergency generator are ultimately purchased. Significant additional funds will be needed to control sediment. One 2002 study estimated \$16 million. Funding to cover these costs will come from town utility fees, grants and CDOT. Implementation of these management approaches is expected to begin in 2011 and will be ongoing following their establishment.

The Town of Dillon has committed to track its efforts and to report to its Town Council annually on its progress in implementing the measures outlined in this report. Further it has committed to the source water protection process in its planning activities for any new water sources.

INTRODUCTION

Protection Plan Process Guidance

The following table has been supplied as a reference document to effectively plan and develop a source water protection plan for your public water supply system. By following the process steps for planning and the associated tasks below, you will be on the pathway to completing this source water protection plan template. This table is an overview of the planning process and more detailed instructions are provided in each section throughout the document.

PROCESS STEPS FOR PLANNING

Objective	Task	Output	Responsible Party
Develop protection plan	Review SWAP assessment results	Report of findings & recommendations	PWS, staff, citizen volunteer
	Report findings to decision makers	Formal presentation to decision makers	PWS, Staff,Citizen Volunteer
	Advocate for developing protection plan	Formal endorsement of decision makers	PWS, staff, Citizen Volunteer
	Explore feasibility of partnering with other PWSs in watershed (if applicable)	Determination of partnering with other PWSs	Staff, Citizen Volunteer
	Appoint citizen steering committee to advise	Citizen Steering committee	Staff, decision makers
	Decide on process to follow	Planning Process	Staff, Steering Comm. Decision makers
	Develop schedule for planning process	Planning Schedule	Steering Comm. & staff
	Decide on public involvement & notice process	Public involvement & notice process	Steering committee & staff
	Produce and distribute plan	Protection Plan	Staff, Steering committee

Public Participation and Steering Committee Establishment

Public participation has been important to the overall success of Colorado’s SWAP program. Source water protection was founded on the concept that informed citizens, equipped with fundamental knowledge about their drinking water source and the threats to it, will be the most effective advocates for protecting this valuable resource. The state successfully used voluntary citizen advisory groups in the development of both the wellhead protection and source water assessment and protection program plans.

The state recommends that the public water supplier or any other well-suited local interest group take the lead in organizing public participation in the local source water protection planning effort. Effective public participation requires a well-organized effort to raise public awareness, to identify groups and individuals interested in helping, and to define and implement the necessary planning tasks. The Steering Committee has adopted this public participation principle and is encouraging the involvement of all types of stakeholders – individuals, groups, organizations and local decision-makers affected by or concerned with the community’s drinking water – in the local source water protection planning and implementation effort. The Steering Committee believes that local support and acceptance of the plan is more likely where local stakeholders have been actively recruited and encouraged to participate in the development and implementation of the protection plan.

Steering Committee and Participants

The Town of Dillon appointed a steering committee to advise them on the design and development of the source water protection plan for Dillon’s water supply. The table below lists the members of the Blue River Watershed Source Water Protection Plan Steering Committee that was established.

Steering Committee

Name	Role/Responsibility	Title	Affiliation
Steve Swanson	Watershed issues	Executive Director	Blue River Watershed Group
Todd Anderson	Power supplier	Area Manager	Xcel Energy
Trevor Giles	Water supplier	Chief Plant Operator	Town of Dillon
Doug Moses	Water supplier	Water Director	Town of Kremmling
Eric Koran	Water supplier	President	Dillon Valley MD Board
Justin Anderson	Forest Service	Hydrologist	U.S. Forest Service
Dan Hendershott	County Government	Manager	SC Environmental Health
Joel Cochran	Emergency Management	Emergency Manager	SC Sheriff's Department
Dave Morris	Water supplier	Superintendent	Snake River Water District
John Duggan	Coordination	SWAP Coordinator	DCPH&E

Other Participants

The source water protection planning process attracted interest and participation from several other key entities. Input by these entities was greatly appreciated and was instrumental in developing the source water protection plan. These participants included:

Gary Roberts – Town of Breckenridge Water Department
Tom Dougherty – Town of Breckenridge Engineering
Holly Huyek – Colorado Department of Transportation
John Hagan – Blue River Watershed Group
Brian Lorch – Summit County Open Space and Trails
Zach Margolis - Town of Silverthorne Water Department
Dave Koop – Mayor, Town of Silverthorne
Jean Kiehm – Vail Resorts
Frank Papandrea – Keystone Resort
Eric Howell – Colorado Springs Utilities
Christiane Hinterman – Friends of the Dillon Ranger District
Captain John Lupton – Colorado State Patrol
John Trentini – Colorado State Patrol
Paul Semmer – US Forest Service
Matt Willits – Water Solutions, Inc.
Kelly Greene – Lake Dillon Fire Rescue

Protection Plan Development Process

The source water protection planning effort consisted of a structured process of work group meetings followed by public meetings. The Blue River Watershed Source Water Protection Plan Steering Committee's recommendations were developed from these work group meetings that were convened to establish the goals and objectives of the protection plan, evaluate the source water assessment results and establish protection priorities, and evaluate source water management approaches. Ultimately, the Blue River Watershed Source Water Protection Plan Steering Committee's recommendations were incorporated into a draft source water protection plan and presented at a public meeting for comment and discussion. A summary of the public meetings that were held is presented below.

Public Meetings

Date	Location	Purpose / Description
11/23/09	Summit County Commons, Buffalo Mountain Room	Meeting to Discuss Issues Associated with Source Water Protection Plan
6/17/2010	Summit County Community and Senior Center	Meeting to Discuss Actual Source Water Protection Plan

The general public was notified of the public meeting schedule – location, dates and times via the Summit Daily News prior to each meeting. An invitation to attend and participate in these public meetings was extended to the entire community including approximately 20 specific stakeholders potentially affected by the source water protection plan.

Purpose of Source Water Protection Plan Development

The Town of Dillon recognizes the potential financial and water supply risks related to the potential contamination of one or more of the community’s water sources. In an effort to address the potential problems that could affect their untreated source water, the Town of Dillon, with guidance from the Colorado Safe Drinking Water Program and the Greenlands Reserve appointed the Blue River Watershed Source Water Protection Plan Steering Committee. The Blue River Watershed Source Water Protection Plan Steering Committee advised Dillon in identifying local source water management approaches that can be voluntarily implemented to reduce the risks of potential contamination of the untreated source water.

The primary reason for developing and implementing source water management approaches is to apply an additional level of protection to the drinking water supply. Preventive measures at the local level (i.e., county and municipal level) may aid in the protection of the source water. These preventive measures will complement existing regulatory protection measures implemented at the state and federal governmental levels by filling protection gaps that can only be addressed at the local level.

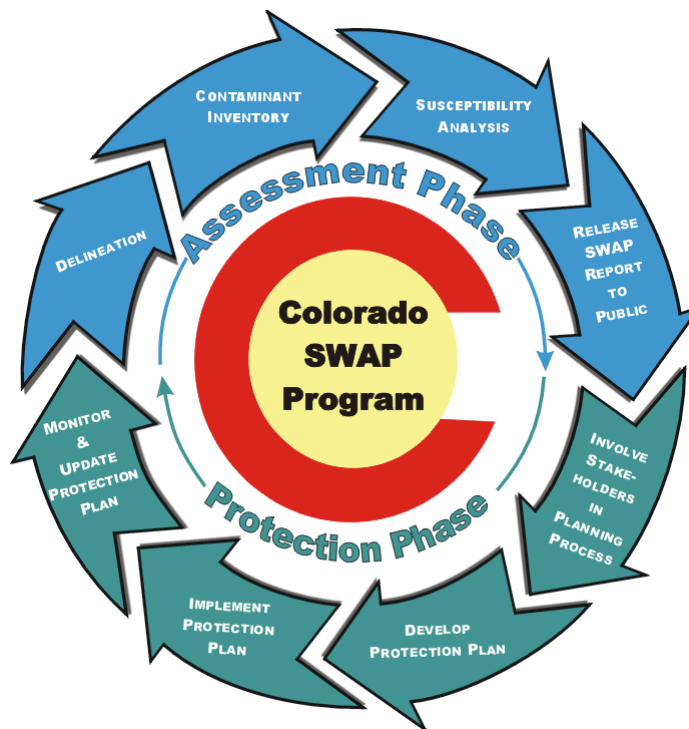
The source water protection plan identifies the source water protection areas where the community has chosen to implement its source water protection measures. In addition, the protection plan establishes a strategy for prioritizing the water sources and potential contaminant sources to which the source water management approaches will be applied. The strategy is based on the source water assessment results for Dillon as a starting point from which these priorities were identified. The protection plan also identifies the source water management approaches and associated tasks that will be implemented within the source water protection areas. In addition, the expected outcome of the tasks, how achievements are measured and the proposed schedule and costs for implementation should be included. The funding source to sustain these approaches and tasks is also identified. Finally, as a companion to the source water protection plan, an emergency response plan or contingency plan was independently developed by Dillon as part of the overall source water management effort. The emergency response plan lays out a coordinated plan for responding rapidly, effectively, and efficiently to any emergency incident that threatens or disrupts the community water supply.

OVERVIEW OF COLORADO'S SWAP PROGRAM

Source water assessment and protection came into existence in 1996 as a result of Congressional reauthorization and amendment of the Safe Drinking Water Act. The 1996 amendments required each state to develop a source water assessment and protection (SWAP) program. The Water Quality Control Division, an agency of the Colorado Department of Public Health and Environment, assumed the responsibility of developing Colorado's SWAP program. The SWAP program protection plan will be integrated with the existing Colorado Wellhead Protection Program that was established in amendments made to the federal Safe Drinking Water Act (SDWA, Section 1428) in 1986. Wellhead protection is a preventative concept that aims to protect public groundwater wells from contamination. The Wellhead Protection Program and the SWAP program have similar goals and will combine protection efforts in one merged program plan.

Colorado's SWAP program is an iterative, two-phased process (Figure 1) designed to assist public water systems in preventing potential contamination of their untreated drinking water supplies. The two phases include the Assessment Phase and the Protection Phase as depicted in the upper and lower portions of Figure 1, respectively.

Figure 1. Source Water Assessment and Protection Process.



Source Water Assessment Phase

As depicted in the upper portion of Figure 1, the Assessment Phase for all public water systems consists of four primary elements.

1. Delineating the source water assessment area for each drinking water source;
2. Conducting a contaminant source inventory to identify potential sources of contamination within each of the source water assessment areas;

3. Conducting a susceptibility analysis to determine the potential susceptibility of each public drinking water source to the different sources of contamination and;
4. Reporting the results of the source water assessment to the public water systems and the general public.

The Assessment Phase involves understanding where the Town of Dillon's source water comes from, what contaminant sources potentially threaten the water sources, and how susceptible each water source is to potential contamination. The susceptibility of an individual water source is analyzed by examining the properties of its physical setting and potential contaminant source threats. The resulting analysis calculations are used to report an estimate of how susceptible each water source is to potential contamination.

Source Water Protection Phase

The Protection Phase is a voluntary, ongoing process in which the Town of Dillon has been encouraged to voluntarily employ preventive measures to protect their water supply from the potential sources of contamination to which it may be most susceptible. The Protection Phase can be used to take action to avoid unnecessary treatment or replacement costs associated with potential contamination of the untreated water supply. Source water protection begins when local decision-makers use the source water assessment results and other pertinent information as a starting point to develop a protection plan. As depicted in the lower portion of Figure 1, the source water protection phase for all public water systems consists of four primary elements.

1. Involving local stakeholders in the planning process;
2. Developing a comprehensive protection plan for all of their drinking water sources;
3. Implementing the protection plan on a continuous basis to reduce the risk of potential contamination of the drinking water sources; and
4. Monitoring the effectiveness of the protection plan and updating it accordingly as future assessment results indicate.

The water system and the community recognize that the Safe Drinking Water Act grants no statutory authority to the Colorado Department of Public Health and Environment or to any other state or federal agency to force the adoption or implementation of source water protection measures. This authority rests solely with local communities and governments. The source water protection phase is an iterative process as indicated in Figure 1. The evolution of the SWAP program is to incorporate any new assessment information provided by the public water supply systems and update the protection plan accordingly.

WATER SUPPLY SETTING

Hydrogeographic and Water Quality Setting

Surface Water Systems

The Town of Dillon supplies drinking water to the residents of Dillon, CO, which is located in Summit County, Colorado. The Town of Dillon has a population of approximately 800 people and is a predominantly a tourist-based community. The water system serves an estimated 3000 people each day including residents and others who visit or work there.

The source water areas for the Town of Dillon's surface water sources are contained within the Straight Creek and Laskey Gulch Watersheds. The Town of Dillon obtains its water supply directly from Straight Creek and Laskey Gulch. Elevations within the source water area(s) range from 9300 feet near the intake to approximately 12,500 feet near the headwaters of Straight Creek along the continental divide. The climate within the source water areas is generally semi-arid with an average annual precipitation amount of approximately 16 to 32.5 inches depending on elevation.

The water quality of the untreated source water is measured against various use classifications and water quality standards that are established and periodically re-assessed by the Colorado Department of Public Health and Environment and the Water Quality Control Commission for Colorado's rivers and streams. Currently, all of the stream segments located above the Town of Dillon's intake are classified to protect drinking water use. For the stream segments with a drinking water use classification, drinking water standards have been established. These stream standards are a reflection of known water quality conditions, as well as historic land uses within the Straight Creek and Laskey Gulch watersheds. Drinking water classifications and associated water quality standards provide public water systems and communities with a mechanism for monitoring and protecting the quality of their source water.

Drinking Water Supply Operation

The Town of Dillon is a community water system that serves Dillon, CO located in Summit County, Colorado. The water system is operated by employees of the Town of Dillon.

The water supply consists of 2 surface water intakes which are located northeast of Dillon. The raw water diverted from the surface water intakes is sent to a membrane surface water treatment system to be treated prior to distributing the drinking water to the water system's customers. The treatment system has the maximum capacity to treat 1.5 million gallons of drinking water per day. The water system transports untreated source water directly to its treatment plant and stores its treated water in two storage tanks prior to distributing the drinking water to the water system's customers. The Town of Dillon has the maximum capacity to store 900,000 gallons of treated drinking water. The Town has emergency intertie connections to the Town of Silverthorne and the Dillon Valley District systems. The Town also has water rights in Old Dillon Reservoir and Salt Lick Gulch. Old Dillon Reservoir is currently being enlarged in cooperation with Summit County, Town of Silverthorne and the Colorado River District.

Water Supply Demands/Analysis

The water system serves an estimated 450 connections and approximately 3000 residents and other users in the service area annually. The water system currently has the capacity of meeting a peak (i.e., maximum) daily demand of 1.5 million gallons per day. Current estimates by the water system indicate that the average daily demand by the water system's customers is approximately 345,000 gallons per day, and that the average peak daily demand is approximately 752,000 gallons per day. Using these estimates, the water system has a surplus average daily demand capacity of 1.155 million gallons per day and a surplus average peak daily demand capacity of 748,000 per day. Using the surplus estimates above, the Town of Dillon has evaluated its ability to meet the average daily demand and the average peak daily demand of its customers in the event the water supply from one or more of its water sources becomes disabled for an extended period of time due to potential contamination. The evaluation indicated that Dillon may not be able to meet the average daily demand of its customers if one of the water sources became disabled for an extended period of time. The evaluation also indicated that Dillon may not be able to meet the average peak daily demand of its customers if one of the water sources became disabled for an extended period of time. The ability of Dillon to meet either of these demands for an extended period of time is also affected by the amount of treated water the water system has in storage at the time a water source becomes disabled.

The potential financial and water supply risks related to the long-term disablement of one or more of the community's water sources are a concern to the Blue River Watershed Source Water Protection Plan Steering Committee. The Town of Dillon has addressed this issue by connecting to Silverthorne's water system and is working on additional backup through Old Dillon Reservoir. Nevertheless, the Steering Committee believes the development and implementation of a source water protection plan for Town of Dillon can help to reduce the risks posed by potential contamination of its water sources.

Growth and Land Use Projections

The latest census information indicated a permanent population of approximately 800 for the Town of Dillon. Based on the latest and previous census information, the Town of Dillon has been experiencing limited growth within the community over the last 9 years. Future projections by the Town of Dillon estimate that growth will

remain limited through 2015 but continue to an estimated population of 7360 by 2050. The number of people served is much higher due to the business community and tourists.

Currently, the Town of Dillon estimates that essentially 100% of the land area within the proposed source water protection area for its water source is currently undeveloped, with the exception of Interstate 70 and the facilities for the Eisenhower and Johnson Tunnels. Most of this undeveloped land is currently National Forest land. While this National Forest land will most likely not be developed, the transportation corridor and forest lands present certain challenges to the water system.

There have been proposals for including portions of the source water area into a wilderness area. This is viewed by the Town of Dillon with concern; because of the limits it might place on their ability to fight a forest fire in their source water area. Dillon hopes to modify the proposed boundaries to satisfy this concern.

SOURCE WATER ASSESSMENT RESULTS

The Colorado Department of Public Health and Environment assumed the lead role in conducting the source water assessments for public water systems in Colorado. The Town of Dillon received their source water assessment report in November, 2004 and has reviewed the report along with the Blue River Watershed Source Water Protection Plan Steering Committee. The Town of Dillon and the Blue River Watershed Source Water Protection Plan Steering Committee are committed to using these assessment results as a starting point to guide the development of appropriate management approaches to protect their source water from potential contamination. A copy of the source water assessment summary report for Dillon can be obtained by contacting the Town of Dillon or by downloading a copy from the Colorado Department of Public Health and Environment's SWAP program web site located at: www.cdphe.state.co.us/wq/sw/swaphom.html. The following sections provide a brief summary of the main findings from the three component phases of the assessment.

Source Water Assessment Area Delineation

Surface Water Systems

The source water assessment area for the Town of Dillon's surface water sources consists of approximately a 20 square mile area draining the Straight Creek and Laskey Gulch watersheds. The Colorado Department of Public Health and Environment provided the Town of Dillon with a draft map of their source water assessment areas and asked them to voluntarily review and comment on its accuracy. The delineated source water assessment areas not only provides the basis for understanding where the community's source water and potential contaminant threats originate, but it also provides the basis for establishing the source water protection areas under this source water protection plan. Further discussion is provided in a later section on the source water protection areas that was established under this plan.

Contaminant Source Inventory

Notice

The information contained in this "Plan" is limited to that available from public records and the water supplier. Other "potential contaminant sites" or threats to the water supply may exist in the source water assessment areas that are not identified in this "Plan". Identification of a site as a "potential contaminant site" should not be interpreted as one that will necessarily cause contamination of the water supply.

The contaminant source inventory was conducted to identify whether or not selected potential sources of contamination might be present within the source water assessment area(s). The Colorado Department of Public Health and Environment inventoried discrete contaminant sources using selected state and federal regulatory databases. Dispersed contaminant sources were inventoried using a recent land use/ land cover and transportation maps of Colorado, along with selected state regulatory databases. The contaminant inventory was completed by mapping the potential contaminant sources with the aid of a Geographic Information System (GIS).

The Colorado Department of Public Health and Environment provided Dillon with a draft map, a summary of the discrete contaminant sources mapped within their source water assessment area(s), and a summary of the dispersed contaminant sources inventoried within the source water assessment area(s). The Town of Dillon was asked to voluntarily review the inventory information, field verify selected information about existing and new discrete contaminant sources, and provide feedback on the accuracy of the inventory.

Discrete Potential Sources of Contamination

The contaminant source inventory results for the Dillon indicate that no discrete contaminant sources were identified within the source water assessment areas for all of the surface water sources analyzed.

Dispersed Potential Sources of Contamination

The contaminant source inventory results for Dillon indicate the following types of dispersed contaminant sources were identified within the source water assessment areas for all of the surface water sources analyzed:

Land Uses:

- Commercial / Industrial / Transportation
- Deciduous Forest
- Evergreen Forest

Other Types:

- Septic Systems
- Road Miles

The inventory within the SWAP identified two septic systems. This was an error. There are no septic systems within the source water protection area.

Source Water Protection Priority Strategy and Susceptibility Analysis

After reviewing the source water assessment results for Dillon, the Blue River Watershed Source Water Protection Plan Steering Committee adopted the two-step strategy recommended by the Colorado Department of Public Health and Environment for prioritizing the water sources and potential contaminant sources on which source water protection measures will be focused. .

The strategy calls for water sources with total susceptibility ratings or physical setting vulnerability ratings of Moderately High or High to be prioritized as the first step in the process. A Moderately High or High total susceptibility rating indicates that the water source is proportionately more susceptible to potential contamination overall when compared to other similar types of water sources around the state. Higher total susceptibility ratings most typically result for water sources with highly vulnerable physical settings and a source water assessment area containing several potential contaminant sources that pose a significant threat to potential contamination. A Moderately High or High physical setting rating indicates a diminished ability of the physical setting of the source water assessment area to buffer contaminant concentrations in the source water below acceptable levels and, therefore it is more vulnerable to potential contamination. Even in cases where few if any potential contaminant sources are currently present, a water source with a highly vulnerable physical setting could be very susceptible to future contamination depending on the type of potential contaminant source(s) that might be introduced. The strategy also outlines three options for prioritizing discrete and dispersed potential contaminant sources for source water protection measures as the second step of the process. These options include prioritizing source water protection measures based on:

1. Most prevalent contaminant sources. Under this option, protection measures would be focused on the discrete and dispersed contaminant sources that occur most frequently in the water system's source water protection area(s), regardless of the individual susceptibility ratings they may have received.

2. Most threatening contaminant sources. Under this option, protection measures would be focused on the individual discrete and dispersed contaminant sources in the water system's source water protection area(s) to which the water source(s) is most susceptible. The most threatening contaminant sources are defined as any potential contaminant source receiving a Moderately High or High individual susceptibility rating.
3. Most prevalent and threatening contaminant sources. Under this option, protection measures would be focused on the most frequently occurring discrete and dispersed contaminant sources in the water system's source water protection area(s) that received a Moderately High or High individual susceptibility rating.

In applying this strategy, the Blue River Watershed Source Water Protection Plan Steering Committee recommends focusing source water protection measures on Straight Creek and Laskey Gulch surface water sources, and the most prevalent and threatening dispersed contaminant sources contained in the source water protection areas for these water sources.

Table 1 below outlines the water sources that the community and the Steering Committee feel should be prioritized based on the assessment susceptibility results. The potential contaminant sources for each water source are listed in Table 1 according to the adopted priority strategy (ie: most prevalent and threatening).