



# A Source Water Assessment (SWA) for

## PWSID #227212 – Heritage Park Subdivision – WL001

### What is an SWA?

The Drinking Water Protection group of the Drinking Water Program is producing Source Water Assessments (SWAs) in compliance with the Safe Drinking Water Act (SDWA) Amendments of 1996. Each SWA includes:

- A delineation of the drinking water source area;
- Inventory of potential and existing sources of contamination;
- Risk ranking for the identified contaminants;
- Evaluation of the overall vulnerability to the PWS source.

### What is a Protection Area?

The most probable area for contamination to reach the drinking water well is within the drinking water protection area (DWPA). The DWPA for a groundwater source is the area around the well (the area influenced by pumping) and also the area upgradient of the well, usually forming a parabola shape. Because releases of contaminants within the DWPA are most likely to impact the well, this area will serve as the focus for voluntary protection efforts.

The DWPAs established for wells by DEC are separated into two (2) zones, limited by the watershed. The following is a summary of the two (2) zones for wells and the estimated time-of-travel for each:

| Zone | Definition                          |
|------|-------------------------------------|
| A    | Several months time-of-travel       |
| B    | Less than the 2 year time-of-travel |

### Natural Susceptibility

Susceptibility of a groundwater source is a measure of a water supply's potential to become contaminated based on information gathered on the wellhead and the aquifer.

Table 1: Public Water System Source Information

|   |                              |
|---|------------------------------|
| <b>PWS Name</b>   | Heritage Park Subdivision    |
| <b>PWSID Number</b>   | 227212                       |
| <b>Federal Designation</b>                                  | Community water system (CWS) |
| <b>State Assigned ID</b>                                    | WL001                        |
| <b>Facility Name</b>  | N/A                          |
| <b>Source Type</b>  | Groundwater                  |
| <b>Total Depth of Well (ft bls*)</b>                        | 126                          |
| <b>Static Water Level (ft bls*)</b>                         | 72                           |
| <b>Aquifer Type</b>   | Semi-confined                |
| <b>Aquifer Formation</b>                                    | Gravel                       |
| <b>Description and Cumulative Thickness of Barrier (ft)</b> | Clay and gravel (7)          |
| <b>Date Well Completed</b>                                  | 1/31/1977                    |

\*"ft bls" = feet below land surface

### **Executive Summary**

The public water system (PWS) for HERITAGE PARK SUBDIVISION is a Community water system (CWS) consisting of one (1) active well at the time of this report, and is located in Palmer, Alaska. This report is an assessment of well WL001. An assessment of the susceptibility of the wellhead and aquifer to contamination, and the vulnerability of the well to potential and existing contamination were evaluated as of June, 2013. The wellhead for WL001 received a susceptibility rating of **Low** and the aquifer received a susceptibility rating of **Very High**. Combining these two ratings produces a **Medium** rating for the natural susceptibility. Identified potential and existing sources of contamination for HERITAGE PARK SUBDIVISION WL001 include cropland, livestock pastures, residential areas, septic systems, abandoned wells, park area, and nearby roads. These are considered sources of one or more of the following six (6) contaminant risk categories: 1) bacteria and viruses; 2) nitrates and/or nitrites; 3) volatile organic chemicals (VOCs); 4) heavy metals, cyanide, and other inorganic chemicals (inorganic chemicals); 5) synthetic organic chemicals (SOCs); and 6) other organic chemicals (OOCs).

Combining the natural susceptibility with the six (6) contaminant risk categories, HERITAGE PARK SUBDIVISION WL001 received an overall vulnerability rating of **High** for bacteria and viruses; **High** for nitrates and/or nitrites; **High** for VOCs; **High** for inorganic chemicals; and a **High** for SOCs and **High** for OOCs.

## Introduction

Source Water Assessments (SWAs) are intended to provide PWS operators, owners, communities, and local governments with the best available information that may be used to protect the quality of their drinking water. The SWA for the HERITAGE PARK SUBDIVISION WL001 is a tool to be used as the foundation or “stepping stone” to comprehensive management and protection of its groundwater resource. Protecting the quality of your drinking water is a sensible investment.

## Drinking Water Protection Area

For groundwater sources, a combination of a numerical flow model and natural factors such as drainage divides, subsurface barriers, and manmade structures are used to determine the size and shape of the Drinking Water Protection Area (DWPA). The orientation of the DWPA is typically drawn using a groundwater surface, or a land surface, elevation map. Because of uncertainties and changing site conditions, a factor of safety is added in calculating the size of the DWPA. (See Map 1 of the Appendices)

## Natural Susceptibility (Wellhead and Aquifer)

The susceptibility of a wellhead to the introduction of contaminants to the drinking water is determined by, but not limited to, the following risk factors: presence of a sanitary seal, protection from flooding, drainage, and presence of adequate grouting.

The wellhead for the HERITAGE PARK SUBDIVISION WL001 received a **Very High** susceptibility rating. The most recent sanitary survey (completed July 12, 2012) indicates that the well is capped with a sanitary seal, is not in a floodplain, the land surface is sloped to drain away from the wellhead, and that a subsurface grout seal has not been installed to the required depth. A sanitary seal prevents potential contaminants from entering the well while sloping of the land surface and grouting help to prevent potential contaminants from traveling down the outside of the well casing, or through casing seams/cracks to the inside of the well casing, and into the well and/or aquifer.

The susceptibility of an aquifer to the introduction of contaminants is determined by, but not limited to, the following risk factors: whether the aquifer is confined or unconfined, whether the well is completed in unconsolidated or fractured bedrock, whether other nearby wells and bore holes are penetrating the aquifer and if applicable the characteristics of the confining layer(s).

The HERITAGE PARK SUBDIVISION WL001 draws water from a confined aquifer completed in varying proportions of mainly sand, gravel, and clay. It received a **Very High** susceptibility rating primarily because of the semi-confined aquifer and nearby abandoned well. A confined aquifer is generally more protected than an unconfined aquifer from the infiltration of surface water potentially carrying contaminants migrating downward from the surface to the aquifer. However, other wells that penetrate the confining layers create a potential pathway for surface water and contaminants to the aquifer.

The Natural Susceptibility is a combination of the well and aquifer susceptibility to contamination, and is **Medium**. Table 2 summarizes the susceptibility ratings for the HERITAGE PARK SUBDIVISION WL001.

**Table 2: Susceptibility Ratings**

|                                |                  |
|--------------------------------|------------------|
| Susceptibility of the wellhead | <b>Low</b>       |
| +                              |                  |
| Susceptibility of the aquifer  | <b>Very High</b> |
| =                              |                  |
| Natural susceptibility         | <b>Medium</b>    |

### Inventory of Potential and Existing Sources Contamination

The Drinking Water Protection (DWP) group has completed an inventory of potential and existing sources of contamination within the DWPA for the HERITAGE PARK SUBDIVISION WL001. This inventory was completed through a search of agency records and other publicly available information. Potential sources of contamination include a wide range of categories and types. Potential drinking water contaminants are found within agricultural, residential, commercial, and industrial areas, but can also occur within areas that have little or no development. The identified potential sources of contamination are summarized in Table 3 and are portrayed in Map 2 of the Appendices.

**Table 3: Contaminant Source Inventory**

| Contaminant Source Type                              | Contaminant Source ID | Zone | Comments                                    |
|--|-----------------------|------|---|
| A02 - Cropland                                       | A02-01                | A    | Garcia's Alaska Farm                        |
| A08 - Livestock pastures                             | A08-01                | A    | Small horse pasture with less than 5 horses |
| R01 - Residential Areas                              | R01-01                | A    | Assumed less than 200 acres                 |
| R02 - Septic systems (serves one single-family home) | R02-01-20             | A    | Assumed less than 20                        |
| W01 - Abandoned wells                                | W01-01                | A    |   |
| X04 - Municipal or city parks (with green areas)     | X04-01                | A    | Chugach State Park                          |
| X20 - Highways and roads, paved (cement or asphalt)  | X20-01-20             | A    | Assumed less than 20                        |

### Contaminant Risks

Inventoried contaminant sources are sorted by the Drinking Water Protection (DWP) group according to the six (6) major categories of contaminants regulated for drinking water: 1) bacteria and viruses; 2) nitrates and/or nitrites; 3) volatile organic chemicals (VOCs); 4) heavy metals, cyanide, and other inorganic chemicals (inorganic chemicals); 5) synthetic organic chemicals (SOCs); and 6) other organic chemicals (OOCs). The contaminant sources are then given a ranking (within each category) according to the density of sources within the DWPA, the PWS sampling history, as well as the degree of risk posed to human health based on the volume, toxicity, persistence, and the mobility of the contaminants involved. The contaminant risk rankings are summarized in Table 4.

**Table 4: Contaminant Risk Rankings**

| Contaminant Source Type                        | Contaminant Source ID | Zone | Bacteria & Viruses | Nitrates and/or Nitrites | VOCs             | Inorganic Chemicals* | SOCs             | OOCs             |
|--|-----------------------|------|--------------------|--------------------------|------------------|----------------------|------------------|------------------|
| Cropland                                       | A02-01                | A    | N/A                | High                     | N/A              | Medium               | High             | N/A              |
| Livestock pastures                             | A08-01                | A    | Medium             | Medium                   | N/A              | N/A                  | Low              | N/A              |
| Residential Areas                              | R01-01                | A    | Low                | Low                      | Low              | Low                  | Low              | Low              |
| Septic systems (serves one single-family home) | R02-01-20             | A    | Low                | Low                      | Low              | Low                  | Low              | Low              |
| Abandoned wells                                | W01-01                | A    | Medium             | High                     | High             | Very High            | High             | High             |
| Municipal or city parks (with green areas)     | X04-01                | A    | Medium             | Medium                   | N/A              | Low                  | Low              | N/A              |
| Highways and roads, paved (cement or asphalt)  | X20-01-20             | A    | Low                | Low                      | Low              | Low                  | N/A              | Low              |
| <b>Contaminant Category Risk Ranking**</b>     |                       |      | <b>High</b>        | <b>Very High</b>         | <b>Very High</b> | <b>Very High</b>     | <b>Very High</b> | <b>Very High</b> |

\* Includes heavy metals, cyanide, and other inorganic chemicals.

\*\* Scores based on additional factors, such as sampling history, and number/density of sources.

The contaminant category risk ranking for Bacteria & Viruses is **High**. This ranking is driven primarily by an abandoned well, a livestock pasture, park area, and the density of residential septic systems, roads, and residential areas located within the DWPA. A positive Total Coliform (which may include fecal coliform and *E. Coli*, but is not a confirmation of the presence of either) has not been detected in recent years. Coliforms are naturally present in the environment, as well as feces; fecal coliforms and *E. Coli* only come from human and animal fecal waste. Total Coliforms is not a health threat in itself; it is used to indicate whether other potentially harmful bacteria may be present.

The contaminant category risk ranking for Nitrates and/or Nitrites is **Very High**. This ranking is driven primarily by cropland, a livestock pasture, an abandoned well, park area, and the density of residential septic systems, roads, and residential areas located within the DWPA. Nitrates and/or nitrites have been detected in samples collected in recent years, but a strong increasing or decreasing trend is not apparent; the most recent sample collected May 2012, showed a total nitrate-nitrite concentration of 1.24 milligrams per liter (mg/L), which is 12% of the maximum contaminant level (MCL) of 10 mg/L for nitrate. Sources of nitrate and/or nitrite may include runoff from fertilizer use, leaking from septic tanks, sewage, and/or erosion from natural deposits. A relatively low concentration and absence of a clear trend implies that the source is natural, rather than anthropogenic. Potential health effects include serious illness and, if untreated, death for infants below the age of six months; symptoms include a shortness of breath and blue-baby syndrome.

The contaminant category risk ranking for VOCs is **Very High**. This ranking is driven primarily by an abandoned well, and the density of residential septic systems, roads, and residential areas located within the DWPA. VOCs have not been detected in samples collected in recent years. Sources of VOCs may be either natural or anthropogenic. Potential health effects are typically compounding long-term, and not acute.

The contaminant category risk ranking for Inorganic Chemicals is **Very High**. This ranking is driven primarily by cropland, an abandoned well, park area, and the density of residential septic systems, roads, and residential areas located within the DWPA. Barium was detected at a concentration of 27 micrograms per liter ( $\mu\text{g/L}$ ) (1.35% of the MCL of 2 mg/L)

November 2009 and 31.9 micrograms per liter ( $\mu\text{g/L}$ ) (1.6% of the MCL of 2 mg/L) November 2008. Sources of Barium may include discharge of drilling wastes; discharge from metal refineries; and erosion of natural deposits. A potential health effect from long-term exposure above the MCL may include an increase in blood pressure.

The contaminant category risk ranking for SOC is **Very High**. This ranking is driven primarily by croplands, a livestock pasture, an abandoned well, park area, and the density of residential septic systems, and residential areas located within the DWPA. This PWS has received an SOC Monitoring Waiver for compliance periods 2011-2013 and 2008-2010.

The contaminant category risk ranking for OOC is **Very High**. This ranking is driven primarily by an abandoned well, park area, and the density of residential septic systems, and residential areas located within the DWPA. This PWS has received an SOC Monitoring Waiver for compliance periods 2011-2013 and 2008-2010.

### Overall Vulnerability of the Drinking Water Source to Contamination

An overall vulnerability is determined by combining each of the contaminant category risk rankings with the natural susceptibility score:

|  |
|--|
| <b><i>Overall Vulnerability of the Drinking Water Source to Contamination = Natural Susceptibility + Contaminant Risks</i></b> |
|--|

Table 5 summarizes the overall vulnerability ratings for each of the six (6) contaminant categories.

**Table 5: Overall Vulnerability**

| <i>Category</i>                                      | <i>Rating</i> |
|--|---------------|
| Bacteria and Viruses                                 | <b>High</b>   |
| Nitrates and/or Nitrites                             | <b>High</b>   |
| Volatile Organic Chemicals                           | <b>High</b>   |
| Heavy Metals, Cyanide, and Other Inorganic Chemicals | <b>High</b>   |
| Synthetic Organic Chemicals                          | <b>High</b>   |
| Other Organic Chemicals                              | <b>High</b>   |

### Using the Source Water Assessment

This assessment of contaminant risks and source vulnerability can be used as a foundation for local voluntary protection efforts as well as a basis for the continuous efforts on the part of the HERITAGE PARK SUBDIVISION PWS to protect public health. Communities can use the Source Water Assessment (SWA) to create a drinking water protection plan to manage the identified potential and existing sources of regulated drinking water contaminants and to prevent or minimize new contaminant threats in the drinking water protection area.

The HERITAGE PARK SUBDIVISION PWS can use a number of different drinking water protection methods to limit or prevent contamination of its drinking water source.

- *Non-Regulatory Options include:*
  - Public education about where drinking water comes from and the effects of contaminants is probably the most effective and least costly method of protection;
  - Household hazardous waste collection - household hazardous wastes are usually generated in small amounts but can have a big impact on the environment;
  - The source water assessment report is a tool that can be used to prioritize protection strategies identified in a drinking water protection plan;

- Taking proactive measures towards proper waste storage and disposal can help eliminate the need to find an alternative drinking water source by preventing source water contamination;
  - Conservation easements - easements can assist in protecting the area by limiting development;
  - Make a written plan on what you will do if an accidental spill happens that could contaminate your source of drinking water; and
  - Local drinking water protection plan (an example or template is available from DEC).
- *Regulatory Options include:*
    - Source protection regulations prohibiting the presence or use of all or specific chemicals within the drinking water protection area;
    - Zoning ordinances to control development within the different protection areas around the source;
    - Subdivision ordinance; and
    - Operating standards for industrial and other activities within the different protection areas around the source.

Source Water Assessments can be updated to reflect any changes in the vulnerability and/or susceptibility of the HERITAGE PARK SUBDIVISION WL001. The data that is used to generate the SWA is updated on an on-going basis as identified in the field or if changes are identified and brought to the attention of the Drinking Water Program.

### **Where to go from here?**

The SWA is a comprehensive evaluation of the potential risk of contamination to the PWS and the source(s) of drinking water used by the system. Identifying potential sources of contamination and the vulnerability of the PWS is an important first step in protecting the drinking water source from contamination. However, in order to prevent contamination from occurring, action must be taken by the PWS owner and/or operator. The SWA can be used by the PWS to educate the local community and to prioritize community-driven protection strategies. Inviting community members, council members, and local government officials to help develop a drinking water protection plan is one essential component towards successful drinking water protection efforts. For questions regarding, or assistance to begin, the process of developing a drinking water protection plan, please contact the Drinking Water Protection group toll-free at #1-866-956-7656 (within Alaska only), or direct at #907-269-7656.

### **Other Resources**

The Drinking Water Protection group, the Environmental Protection Agency (EPA), and local organizations are available to help you build on this SWA report as you continue to improve drinking water protection in your community.

- DEC, Drinking Water Protection - [http://dec.alaska.gov/eh/dw/DWP/DWP\\_main.html](http://dec.alaska.gov/eh/dw/DWP/DWP_main.html)
- EPA, Drinking Water Protection - <http://cfpub.epa.gov/safewater/sourcewater/index.cfm>
- Groundwater Foundation - <http://www.groundwater.org>
- Groundwater Protection Council- <http://www.gwpc.org>
- National Ground Water Association: <http://www.ngwa.org/Pages/default.aspx>

### **Appendices**

- HERITAGE PARK SUBDIVISION WL001 Drinking Water Protection Area Location Map (Map 1);
- HERITAGE PARK SUBDIVISION WL001 Drinking Water Protection Area with Potential and Existing Contaminant Sources (Map 2);

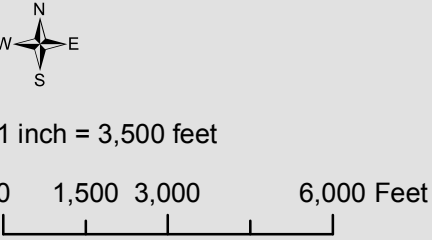
- Example Best Management Strategies for Potential Contaminants Identified within a Drinking Water Protection Area.





**Map 1** - Heritage Park Subdivision  
*Heritage Park Well*

**PWSID 227212**  
**WL001**



**Legend**

**DWP-Regulated Water System Sources**

- Community Water System (Formerly Class A)
- NonTransient/NonCommunity (Formerly Class A)
- NonCommunity (Formerly Class B)
- NonPublic (Class C-State Regulated)

**Identified Drinking Water Protection Areas (DWPAs)**

- Zone A (GW-Several Months Time of Travel or SW 1000 ft buffer)

**Other Relevant DWPAs**

- Zone A (GW-Several Months Time of Travel or SW 1000 ft buffer)
- Zone B (GW-2 Yr Time of Travel or SW-1 mile buffer)





**Legend**

Identified Existing Potential Sources of Contamination

Alaska Faultlines

Abandoned wells (W01)

A02--Cropland

A08--Livestock pastures

X04--Parks (with green areas)

This regional map shows the Heritage Park Subdivision area. A red line delineates the boundary of the drinking water protection area. Within this area, there are green-shaded regions labeled A02 (Cropland) and purple-shaded regions labeled A08 (Livestock pastures). A blue circle with a crosshair symbol indicates the location of Well #1. The map also shows surrounding features like the Matanuska River, E. Doc McKinley Ave, and E. Sullivan Ave. A scale bar indicates 1 inch = 9,000 feet, with markings for 0, 0.75, 1.5, and 3 miles. Source text at the bottom: Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, iPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2012, Copyright: ©2013 Esri, DeLorme, NAVTEQ

This aerial map provides a detailed view of the Heritage Park Subdivision. A red line outlines the boundary of the drinking water protection area. Two specific areas are highlighted: a purple-shaded area labeled A08 (Livestock pastures) and a green-shaded area labeled A02 (Cropland). A blue circle with a crosshair symbol marks the location of Well #1, with the text 'PWSID:227212.001' next to it. A callout box points to the well location, listing 'Additional Potential Sources of Contamination (Zone A)': R01: Residential Areas (Assumed less than 200 acres), R02: Septic Systems (Assumed less than 20), and X20: Highways and Roads (Paved - Assumed less than 20). A scale bar at the bottom right indicates 1 inch = 400 feet, with markings for 0, 200, 400, and 800 feet. Copyright text at the bottom right: © 2010 DigitalGlobe © 2010 GeoEye © 2013 Microsoft Corporation

Map 2 - Heritage Park Subdivision  
Well #1

PWSID 227212  
WL001

**Legend**

DWP-Regulated Water System Sources

Community Water System (Formerly Class A)

NonTransient/NonCommunity (Formerly Class A)

NonCommunity (Formerly Class B)

NonPublic (Class C-State Regulated)

Identified Drinking Water Protection Areas (DWPAs)

Zone A (GW-Several Months Time of Travel or SW 1000 ft buffer)

Other Relevant DWPAs

Zone A (GW-Several Months Time of Travel or SW 1000 ft buffer)

Zone B (GW-2 Yr Time of Travel or SW-1 mile buffer)

The seal of the Department of Environmental Conservation, State of Alaska, is located in the bottom right corner. It features a circular design with a mountain, a river, and a sun, surrounded by the text 'DEPARTMENT OF ENVIRONMENTAL CONSERVATION' and 'STATE OF ALASKA'.

Data sources: Alaska DEC: Public Water System sources and Drinking Water Protection Areas;

Date Saved: 6/27/2013; Author: rmbairl



**Contaminant Source Inventory and Risk Ranking for  
NUGENS RANCH (POINT MACKENZIE)  
WELL**

AK2220308  
WL001

| Contaminant Source  | CSI<br>D | CSID<br>Tag | Zone | Map | Risk<br>Rank | Comments                   |
|---|----------|-------------|------|-----|--------------|----------------------------|
| Bacteria and Viruses  |          |             |      |     |              |                            |
| Livestock pastures  | A08      | A08-01      | A    | 2   | Medium       | Less than 10 acres         |
| Injection wells (Class V) Large-Capacity Septic System (Drainfield Disposal Method) | D10      | D10-01      | A    | 2   | High         |                            |
| Highways and roads, paved (cement or asphalt)                                       | X20      | X20-01-50   | B    | 2   | Low          | Assumed less than 50 roads |
| Highways and roads, dirt/gravel   | X24      | X24-01-20   | A    | 2   | Low          | Assumed less than 20 roads |
| Heavy Metals, Cyanide, and Other Inorganic Chemicals                                |          |             |      |     |              |                            |
| Cropland  | A02      | A02-01      | A    | 2   | Medium       | Less than 20 acres         |
| Injection wells (Class V) Large-Capacity Septic System (Drainfield Disposal Method) | D10      | D10-01      | A    | 2   | Low          |                            |
| Highways and roads, paved (cement or asphalt)                                       | X20      | X20-01-50   | B    | 2   | Low          | Assumed less than 50 roads |
| Highways and roads, dirt/gravel   | X24      | X24-01-20   | A    | 2   | Low          | Assumed less than 20 roads |
| Nitrates/Nitrites   |          |             |      |     |              |                            |
| Cropland  | A02      | A02-01      | A    | 2   | High         | Less than 20 acres         |
| Livestock pastures  | A08      | A08-01      | A    | 2   | Medium       | Less than 10 acres         |
| Injection wells (Class V) Large-Capacity Septic System (Drainfield Disposal Method) | D10      | D10-01      | A    | 2   | High         |                            |
| Highways and roads, paved (cement or asphalt)                                       | X20      | X20-01-50   | B    | 2   | Low          | Assumed less than 50 roads |
| Highways and roads, dirt/gravel   | X24      | X24-01-20   | A    | 2   | Low          | Assumed less than 20 roads |
| Other Organic Chemicals   |          |             |      |     |              |                            |
| Injection wells (Class V) Large-Capacity Septic System (Drainfield Disposal Method) | D10      | D10-01      | A    | 2   | Low          |                            |
| Highways and roads, paved (cement or asphalt)                                       | X20      | X20-01-50   | B    | 2   | Low          | Assumed less than 50 roads |
| Highways and roads, dirt/gravel   | X24      | X24-01-20   | A    | 2   | Low          | Assumed less than 20 roads |
| Synthetic Organic Chemicals   |          |             |      |     |              |                            |
| Cropland  | A02      | A02-01      | A    | 2   | High         | Less than 20 acres         |
| Livestock pastures  | A08      | A08-01      | A    | 2   | Low          | Less than 10 acres         |

**Contaminant Source Inventory and Risk Ranking for**  
**NUGENS RANCH (POINT MACKENZIE)**  
**WELL**

AK2220308  
WL001

|   |     |           |   |   |     |                            |
|---|-----|-----------|---|---|-----|----------------------------|
| Injection wells (Class V) Large-Capacity Septic System (Drainfield Disposal Method) | D10 | D10-01    | A | 2 | Low |                            |
| Volatile Organic Chemicals  |     |           |   |   |     |                            |
| Injection wells (Class V) Large-Capacity Septic System (Drainfield Disposal Method) | D10 | D10-01    | A | 2 | Low |                            |
| Highways and roads, paved (cement or asphalt)                                       | X20 | X20-01-50 | B | 2 | Low | Assumed less than 50 roads |
| Highways and roads, dirt/gravel   | X24 | X24-01-20 | A | 2 | Low | Assumed less than 20 roads |
|   |     |           |   |   |     |                            |