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| Review of the Sammamish Plateau Water and Sewer District 2018 Water Comprehensive Plan Revised October 2019 |
| Service Area  The Sammamish Water and Sewer District service area is on the Sammamish Plateau and the eastern portion of Union Hill east of 244th Avenue. The district is bounded by Lake Sammamish on the west, the Snoqualmie Valley on the east and approximately NE 90th Street on the north, and I-90 on the South. The area includes the majority of the City of Sammamish and the northern portion of the City of Issaquah.The retail service area is 29.3 square miles in size and is a subset of the future service area. The district provides water service in two zones.  The Plateau Zone encompasses 24.8 square miles and is south of the Redmond-Fall City Road, centered on the Sammamish Plateau, bounded by Lake Sammamish on the west and the Snoqualmie Valley on the east. The majority of the Plateau Zone is in the urban area.  The Cascade View Zone is located north of the Plateau Zone and encompasses 4.5 square miles north of the Redmond–Fall City Road. Much of the Cascade View Zone is located on the eastern portion of Union Hill. The Cascade View Zone is zoned rural.  The future service area is relatively small and generally runs along the eastern part of the district. Adjacent large water purveyors include the City of Issaquah, City of Redmond, Northeast Sammamish Sewer & Water District, Union Hill Water District, Fall City Water District and Ames Lake Water Association. The District’s service area overlays one smaller Group A and 60 Group B public water systems.  The district holds several franchises for water and sewer service including franchise 6301, 6184, 6311, 7542, and 7864. Four of the franchises are expired. The district is in the process of updating the franchises with intent to combine them into one for water and one for sewer.  Water Use Efficiency  The district currently provides water service for approximately 62,400 people in its service area. Nearly all of the service area is composed of single and multi-family residences and most are in the Plateau Zone. The district has approximately 18,144 service connections. The customers within the district’s service area consume approximately 4.68 million gallons of water per day (mgd) on an annual average basis, and about 10.6 mgd during a peak day of usage. Average day water demands are projected to reach 5.99 mgd by 2027, and 6.1 mgd by 2037. Maximum day demand is forecast to reach 12.7 mgd by 2027 and 13.0 mgd by 2037. Distribution system loss was approximately 4.2 percent for 2018 and a three-year rolling average of 4.8 percent.  The district is hydraulically divided into two parts, the Plateau Zone located south of Redmond–Fall City Road and the Cascade View Zone located north of Redmond–Fall City Road. Most of the Plateau Zone is located within the urban growth area. The system includes a total of 12 wells, two connections to the Cascade Water Alliance’s regional supply, eight storage tanks, and more than 295 miles of transmission and distribution pipelines. Two notable advances by the District since the last plan include the implementation of Advanced Metering Infrastructure, and adoption of an Asset Management Plan.  The Plan contains an ambitious ten-year capital improvement plan with the cost estimated to be approximately $56.8 million dollars. The district identified three funding sources for the proposed improvement projects: developer extensions, rates, and general facility charges.  Reclaimed Water and Regional Planning The district recognizes the value of reclaimed water as a means to conserve and extend the useful life of the potable water supply. The district is part of the Cascade Water Alliance (CWA) and participated in the 2004 reclaimed water evaluation by CWA. The District also completed and filed an updated Reclaimed Water Checklist as part of this Plan. At this time there is limited feasibility of using reclaimed water for various non-potable water needs in the District’s service area.  SEPA  The district completed a State Environmental Policy Act (SEPA) checklist for the Plan and, as lead agency, issued a determination of non-significance for the issuance of the Plan on February 19, 2018. There was no appeal of the decision. |

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| A review of the specific statutes, rules, codes, and policies to the water system plan is as follows: | | |
|  | **A. General water plan, King County Code (KCC) 13.24.010 and 13.28** | **Comments/findings** |
| (1) | Review is applicable to water utilities distributing or obtaining water in unincorporated King County, and/or utilities that are special purpose districts created pursuant to Title 57 Revised Code of Washington (RCW). Is there a need to meet the consistency requirements of RCW 43.20.260? | * Yes, the Sammamish Plateau Water and Sewer District's 2018 Water Comprehensive Plan (Plan) is subject to King County Council approval under Title 57 RCW. * Yes, The Washington State Department of Health (DOH) also needs to demonstrate consistency for the Plan under RCW 43.20.260. |
| (2) | Consistency with King County Comprehensive Plan (KCCP) and development regulations, and policies including KCC 21A.28.040 development standards, provision of adequate supplies for anticipated growth and development. | * Yes, the District's Plan is consistent. |
| (3) | Infrastructure for existing and future service areas based on adopted land use map. | * Yes. The District's service area is located in both the urban and rural areas. The District used land use data from King County for the rural area and appropriately used the cities of Issaquah, Sammamish and Redmond adopted land use data for the urban area. |
| (4) | Review proposals for modified or expanded service areas based on compliance with utility's approved plan, and ability to meet duty to serve requirement. | * Not applicable. The District's service area is well defined and bounded on all sides by other water utilities. The service area has not changed recently and is not expected to change. |
| (5) | Sufficient information to demonstrate the ability to provide service consistent with the requirements of all applicable statutes, codes, rules, and regulations. | * Yes, the Plan demonstrates an ability to provide service consistent with applicable statutes, codes and regulations. The District obtains its water primarily from groundwater sources. * The District is current with its required water quality monitoring with no recent exceedances of contaminants. * The District has detected minute amounts of per- and polyfluorinated substances in two wells. The uncertainty with understanding of health impacts and potential regulations has prompted more specific review of use of those wells for supply. * To assist in the understanding of this situation, the District updated its Issaquah Valley groundwater model in 2016. The District then developed a monitoring and response plan. |
| (6) | Monitor and review effectiveness of purveyor conservation plans if within area covered by an approved Coordinated Water System Plan (CWSP). | * The District is part of the Cascade Water Alliance and participates in its water use efficiency plan that is organized to conform to the state requirements. * The District is within the East King County CWSP. |
|  | **B. Consistency requirements: 13.24.060** |  |
| (7) | State and local health requirements. | * Yes, water purveyed meets State and local health requirements. |
| (8) | Creation and maintenance of logical service areas. | * Yes, the service area is logical. |
| (9) | Elimination or prevention of duplicate facilities. | * Yes. The District intends to provide service within its service area by means of direct connection. The District does not foresee any need to provide satellite management services. * The District has entered into agreements with neighboring water utilities and maintains interties with adjacent water utilities. |
| (10) | Promotion of most healthful and reliable services to the public. | * Water purveyed by the District complies with public health standards. |
| (11) | Provision of service at a reasonable cost, and maximization of use of public facilities. | * Yes, the District's rates for water service are comparable to the rates charged by similar utilities. * The District has adopted a graduated rate structure to encourage efficiency of water use. |
|  | King County Comprehensive Plan and other pertinent county adopted plans and policies. | * Yes, there is consistency between the District's Plan and the King County Comprehensive Plan. |
| (12) | Basin-wide or multi-basin water plans, sewerage plans, or both when approved by the Washington State Department of Ecology (Ecology) or Department of Health (DOH). | * The District has not been involved in multi-basin water plans. |
| (13) | Applicable state water quality, water conservation, and waste management standards. | * Yes, applicable standards are met. * The District's distribution system loss (non-revenue or unaccounted-for water) for 2018 was 4.2 percent and the three-year average is 4.8 percent and meets the statutory goal. |
| (14) | Water Resources Act (RCW 90.54). | * The Plan makes no connection between the District's conservation program and the requirements of RCWs 90.54.180 and 90.03.386. |
| (15) | Growth Management Act (GMA) (RCW 36.70A). | * The District has a conservation program in place. * The District serves both incorporated urban areas and unincorporated rural areas and plans service consistent with the land use and zoning. |
| (16) | Groundwater management plans. | * The District has three Wellhead Protection Areas (WHPA) covering the Cascade View wells, Plateau wells, and Lower Issaquah Valley wells. WHPA delineations have been developed for each well with the 1, 5, and 10-year time of travel boundaries established. * The WHPAs that extend into unincorporated King County are included in the Critical Area Ordinance, critical aquifer recharge areas and land use is regulated to protect groundwater quality. |
| (17) | Federally approved habitat conservation plans and recovery plans under the Endangered Species Act (ESA). | * As part of its ESA compliance program, the District operates consistent with best management practices as appropriate to protection of endangered species. |
| (18) | Requirements for salmon recovery under Ch. 77.85 RCW, and other plans, including regional water supply or water resource management plans. | * Not discussed in Plan. |
|  | **C: Countywide Planning Policies** |  |
| (19) | G-4: Adopt comprehensive plans that are consistent with the Countywide Planning Policies as required by the Growth Management Act. | * Yes, the District adopted a plan that is consistent with Countywide Planning Policies. |
| (20) | EN-19: Promote energy efficiency, conservation methods and sustainable energy sources to support climate change reduction goals. | * Not discussed in Plan. |
| (21) | DP-13: All jurisdictions shall plan to accommodate housing and employment targets. This includes coordinating water, sewer, transportation and other infrastructure plans and investments among agencies, including special purpose districts. | * Yes, the District asserts it can accommodate population and employment targets of the cities and unincorporated areas within its service area. |
| (22) | PF-2: Coordinate among jurisdictions and service providers to provide reliable and cost-effective services to the public. | * Yes, the District has coordinated with neighboring service providers with interties for emergency supply. |
| (23) | PF-4: Develop plans for long‐term water provision to support growth and to address the potential impacts of climate change on regional water resources. | * Sufficient water supply for growth is available. * Climate change is not mentioned; however, the District's source water is from groundwater systems that are expected to not be impacted by climate change. |
| (24) | PF-7: Plan and locate water systems in the Rural Area that are appropriate for rural uses and densities and do not increase the development potential of the Rural Area. | * Yes, the District is planning appropriately for rural services. |
| (25) | PF-8: Recognize and support agreements with water purveyors in adjacent cities and counties to promote effective conveyance of water supplies and to secure adequate supplies for emergencies. | * Yes, the District's supply is regionally coordinated with its partners in the Cascade Water Alliance. * The District also has agreements with neighboring water systems with interties and emergency back-up. |
| (26) | PF-9: Implement water conservation and efficiency efforts to protect natural resources, reduce environmental impacts, and support a sustainable long‐term water supply to serve the growing population. | * The water conservation and efficiency efforts of the District meet the minimum required by statute. * The distribution system loss in 2018 was 4.2 percent with a three-year rolling average of 4.8 percent. The distribution system loss is within or meets State standards. |
| (27) | PF-10: Encourage water reuse and reclamation, especially for high‐volume non‐potable water users such as parks, schools, and golf courses. | * The District filed an updated Reclaimed Water Checklist as part of this Plan. * The District evaluated water reclamation opportunities and found use of reclaimed water is not be viable at this time. |
|  | **D: King County Comprehensive Plan (KCCP)** |  |
| (28) | F-107: With special purpose districts or local service providers, plan for provision of services to rural areas. | * Yes, the District is planning appropriately for rural serves. |
| (29) | F-108: King County to work with cities and service providers to establish priority areas for public funding of capital facilities. | * Yes, King County will do this. |
| (30) | F-201: All facilities and services should be provided in compliance with provisions and requirements of the Endangered Species Act and the Clean Water Act. | * Yes, see Number 17. |
| (31) | F-209: In the Rural Area, services provided by agencies should support a rural level of development and not facilitate urbanization. | * Yes, the services by the District will support a rural level of development and not facilitate urbanization. |
| (32) | F-210: Capital facility plans and capital improvement programs for services to unincorporated King County are consistent with the KCCP. | * Yes, the District's Capital Improvement Plan is consistent with the KCCP. |
| (33) | F-211: King County helps coordinate development of utility facilities with other projects that utilize public rights-of-way and easements, where possible. | * Not applicable. |
| (34) | F-221: King County shall initiate a sub-area planning process with any service provider that declares, in its capital facilities plan, an inability to meet service needs within service area. | * Not applicable as the District did not identify an inability to meet service needs within its service area. |
| (35) | F-223: If a service deficiency is identified in a service provider's existing service area, King County and the applicable service provider shall remedy the deficiency through a joint planning process addressing capital improvement programs and long-term funding strategies. | * Not applicable as the District did not identify an inability to meet service needs within its service area. |
| (36) | F-231: King County supports coordination of regional water supply planning, sales of excess water supplies among municipalities in the region, water quality programs and water conservation, reuse and reclaimed water programs. | * The District has interties with neighboring utilities to provide emergency water supply. * The District is also a member of the Cascade Water Alliance. |
| (37) | F-232: Water utilities that obtain water from, or distribute water in unincorporated King County, and water utilities formed as special purpose districts under Title 57 RCW are required to submit water system plans to the county for review and approval and shall describe in their plans how they intend to meet their duty to provide service within their retail service area. | * The District does provide water to unincorporated areas. * The District is a special purpose district formed under Title 57 RCW. * The District can meet its duty to serve in the designated retail service area. |
| (38) | F-246: King County supports interties that allow the transfer of water resources among water utilities to meet the projected demands for growth where such interties meet the requirements of RCW 90.03.383 and are also consistent with any applicable locally adopted comprehensive plans, regional water supply plans, adopted groundwater management plans, watershed plans, approved Coordinated Water System Plans, Endangered Species Act response requirements and Clean Water Act requirements. | * The District has multiple intertie with the neighboring water utilities to provide emergency water supply. * The District has policies that outline its approach to provision of service within its Retail Service Area, consistent with “duty to serve” requirements established by the State. |
| (39) | F-249: Utilities with more than one thousand service connections required to submit water system plans for approval to King County shall include an evaluation of reclaimed water use opportunities by completing King County's Water Reclamation Evaluation Checklist. | * Yes, see number 27. |
| (40) | F-251: In its review of water system plans, the UTRC shall consider the criteria provided in K.C.C. 13.24.010, 13.24.060, and 13.24.070, and determine the plan's consistency with the following:  a. Applicable provisions of the King County Comprehensive Plan, land use plans, and development regulations adopted under the Growth Management Act;  b. Approved or adopted regional water resource plans, such as basin plans, groundwater plans, watershed-based conservation and recovery plans developed under ESA, salmon recovery plans developed under chapter 77.85 RCW, water resource plans developed under chapter 90.54 RCW, watershed plans developed under chapter 90.82 RCW, and a regional water supply plan or water resource management plan;  c. The county's Regional Wastewater Services Plan; and  d. Other applicable provisions of countywide plans managed by King County, as specified in UTRC guidance or checklists. | * The UTRC has reviewed the planning data and the District's operations and has found the Plan is consistent with:   a. the King County Comprehensive Plan, land use plans and development regulations;  b. to the extent applicable, the basin plans, groundwater plans, watershed-based conservation and recovery plans for the  service area; and  c. other applicable provisions.   * The District worked with the City of Issaquah regarding the Lower Reid Infiltration Gallery to avoid risk of contamination of the groundwater supply in the Issaquah Valley aquifer near the District’s Well 9. |
| (41) | F-252: In reviewing proposals for modified and expanded service area boundaries for municipal water suppliers, the UTRC shall consider, in addition to Policy F-251:  a. Compliance by the water system with its water system comprehensive plan, including water conservation elements;  b. Whether it can meet its duty to provide service within its service area, as required under chapter 43.20 RCW; and  c. Consistency with the service provisions of any applicable Coordinated Water System Plan, as adopted in King County Code Chapter 13.28. | * Not applicable as the District is not changing its water service area. |
| (42) | F-253: Consistent with Countywide Planning Policies, public drinking water system surface water reservoirs and their watersheds should be managed primarily for the protection of drinking water, but should allow for multiple uses, including recreation, when such uses do not jeopardize drinking water quality standards. Public watersheds must be managed to protect downstream fish and agriculture resources. | * Not applicable as the District does not control any surface water reservoirs or watersheds. |
| (43) | F-254: Groundwater-based public water supplies should be protected by preventing land uses that may adversely affect groundwater quality or quantity to the extent that the supply might be jeopardized. The county shall protect the quality and quantity of groundwater used as water supplies through implementation of Policies E-493 through E-497 where applicable. | * Yes, the District does this with the WHPA program. |