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| Review of the City of Enumclaw Comprehensive Water System Plan |
| Service AreaThe City of Enumclaw (the City) owns and operates a municipal water system that primarily serves the City as well as unincorporated lands in King County contiguous with the City. The Cityis located in south central King County. Its water system provides service to an area of approximately 35square miles; the City is approximately 5.3 square miles in area. The City is surrounded by adjacent water utilities including those of the Marion Water System, Muckleshoot Water System, Walzak Water System, Remolif Addition Water System, City of Black Diamond, and City of Buckley. There are also approximately 75 Group B systems in the service area. It is unlikely the retail water service area will expand in the future and may decrease in size if the cost of service is prohibitive.The City holds franchise number 12473 for water distribution; the franchise is current and expires in 2021. Water Use EfficiencyThe City’s water system provides service to a population of approximately 15,220 residents of which 10,896 are located in the City. The total number of equivalent residential units (ERUs) is 7,337 and the projected ERUs in 2033 is 11,011.Average water demand is approximately 1.69 million gallons per day. The City uses a peaking factor of 2.10, which is a multiplier used to calculate peak demands on the water system.The City currently has an average ERU use of 223 gallons per day. The recent annual average distribution system loss is approximately 10.3percent, with a three-year average value of 9.7 percent which is less than the statutory standard of ten percent. The City’s water system includes five reservoirs, one pressure reducing station, seven pump stations, and booster stations to serve the nine major pressure zones through nearly 142 miles of pipeline. The City owns four ground water supply facilities with an ability to produce approximately 8.1million gallons per day of water. The Cityalso has an emergency intertie connection to the Tacoma water pipeline that traverses the City. The Plan contains a six-year capital improvement program with an estimated cost of approximately $7.9million. The funding sources for the proposed improvement projects includerates, water service fees, loans, and bond proceeds. Reclaimed Water The City completed King County’s Reclaimed Water Checklist and while recognizing the value of reclaimed water does not currently use any reclaimed water.SEPAThe City 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 May 1, 2013, and there were no appeals. |
| 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 utilities that obtain or distribute water in unincorporated King County under KCC 13.24.
* Is there a need to meet the consistency requirements of RCW 43.20.260?
 | * Yes, the City distributes water in unincorporated King County and the plan is subject to King County Council approval.
* Yes, the Washington State Department of Health (DOH) also needs to determine consistency of the Plan under RCW 43.20.260.
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| (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 Plan is consistent.
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| (3) | * Infrastructure for existing and future service areas based on adopted land use map.
 | * Yes. The City used adopted land use maps for that portion of the service area within unincorporated King County.
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| (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.
 | * The existing service area is the same as the service area adopted in the South King County Coordinated Water System Plan (CWSP) with minor exceptions that will be addressed when the CWSP is updated.
* The City maintains duty to serve policies for its retail service area.
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| (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 City obtains its water from groundwater and a spring system.
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| (6) | * Monitor and review effectiveness of purveyor conservation plans if within area covered by an approved CWSP.
 | * The City is within the South King County CWSP and states that it has established policies, design standards, and goals that meet or exceed the requirements and goals of the CWSP.
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|  | B. Consistency requirements: 13.24.060 |  |
| (7) | * State and local health requirements.
 | * Yes.
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| (8) | * Creation and maintenance of logical service areas.
 | * Yes, the service area is logical.
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| (9) | * Elimination or prevention of duplicate facilities.
 | * Yes. The City intends to provide service within its service area by means of direct connection.
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| (10) | * Promotion of most healthful and reliable services to the public.
 | * Yes. Water purveyed by the City complies with public health standards.
* The water is treated and chlorinated.
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| (11) | * Provision of service at a reasonable cost, and maximization of use of public facilities.
 | * Yes, the City's rates for water service are comparable to the rates charged by similar utilities.
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| (12) | * Basin-wide or multi-basin water plans, sewerage plans, or both when approved by the Washington State Department of Ecology (Ecology) or DOH.
 | * No multi-basin water plans are applicable.
* The Plan is consistent with the South King County CWSP.
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| (13) | * Applicable state water quality, water conservation, and waste management standards.
 | * The City’s water meets applicable water quality standards.
* The three-year rolling average distribution system leakage is estimated at 9.7percent, which is less than ten percent requirement established under the Municipal Water Law.
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| (14) | * Water Resources Act (RCW 90.54).
 | * The Plan makes no connection with the requirements of RCW 90.54.180 or RCW 90.03.386. The City will maintain its existing conservation (efficiency) program to comply with DOH’s Water Use Efficiency Rule.
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| (15) | * Growth Management Act (GMA) (RCW 36.70A).
 | * The City appropriately used King County land use zoning for that area of King County it serves.
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| (16) | * Groundwater management plans.
 | * The City has a Well Head Protection Program for the groundwater sources that has been incorporated into the King County Critical Areas Ordinance.
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| (17) | * Federally approved habitat conservation plans and recovery plans under the Endangered Species Act (ESA).
 | * Not discussed in Plan.
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| (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.
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|  | 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.
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| (20) | EN-19: Promote energy efficiency, conservation methods and sustainable energy sources to support climate change reduction goals.  | * Not discussed in Plan.
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| (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.  | * The City is planning to accommodate housing targets that it adopted and is using reasonable growth rates for that part of unincorporated King County that it serves.
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| (22) | PF-2: Coordinate among jurisdictions and service providers to provide reliable and cost effective services to the public. | * The City coordinated its water plan with neighboring jurisdiction infrastructure plans.
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| (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. | * The City has sufficient water supply for long-term growth.
* Climate change is not mentioned.
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| (24) | PF-7: Plan and locate water systems in the Rural Area that are appropriate for rural uses anddensities and do not increase the development potential of the Rural Area.  | * The City recognizes the limited growth King County is planning for in the rural area that it serves and is planning accordingly.
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| (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.  | * The City is self-supplied from four sources.
* The City is located within the South King County Critical Water Supply Service Area, and its Plan is subject to consistency with the South King County CWSP.
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| (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 City meet the minimum required by statute.
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| (27) | PF-10: Encourage water reuse and reclamation, especially for high‐volume non‐potable water users such as parks, schools, and golf courses. | * The City operates its own wastewater treatment system and recognizes the value of reclaimed water as a means to conserve and extend the useful life of the potable water supply, though it does not currently use reclaimed water.
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|  | D: King County Comprehensive Plan  |  |
| (28) | F-107: With special purpose districts or local service providers, plan for provision of services to rural areas. | * Yes, the City has appropriately planned for that part of the rural area it serves.
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| (29) | F-108: King County to work with cities and service providers to establish priority areas for public funding of capital facilities.  | * Yes, the City and the County established priority areas through the capital facilities plan.
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| (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.
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| (31) | F-209: In the Rural Area, services provided by agencies should support a rural level of development and not facilitate urbanization. | * The City recognizes the limited growth King County is planning for in the rural area that it serves and is planning accordingly.
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| (32) | F-210: capital facility plans and capital improvement programs for services to unincorporated King County are consistent with the KCCP. | * Yes, the City’s capital facility plans and capital improvement programs for services to unincorporated King County are consistent with the KCCP.
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| (33) | F-211: King County helps coordinate development of utility facilities with other projects that utilize public rights-of-way and easements, where possible. | * Yes, this is done.
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| (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 City did not identify an inability to meet service needs within its service area.
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| (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 City did not identify an inability to meet service needs within its service area.
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| (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 City supports coordination of water supply planning with neighboring utilities.
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| (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. | * Yes, the City distributes water in unincorporated King County and the Plan describes how it intends to meet its duty to provide service within its retail service area.
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| (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 City has anemergency intertie with the City of Tacoma system.
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| (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, the City completed King County’s Water Reclamation Evaluation Checklist.
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| (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; andd. Other applicable provisions of countywide plans managed by King County, as specified in UTRC guidance or checklists. | * The UTRC has reviewed the planningdata and city 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,groundwaterplans,watershed-basedconservation and recovery plansfor the service area;c. the Regional Wastewater Services Plan; andd. other applicable provisions. |
| (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; andc. 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 City is not changing its water service area.
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| (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.
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| (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, this is accomplished through the Well Head Protection Program and the critical areas ordinances.
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