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| Review of the Snoqualmie Pass Utility District Water System Plan |
| Service Area  The Snoqualmie Pass Utility District (District) owns and operates a municipal water system that primarily serves the western summit of Snoqualmie Pass along Interstate 90 and surrounding area in King and Kittitas Counties. The District was formed in 1984 when Summit Sewer District merged with Kittitas County Sewer District 1 and currently serves an area of approximately 1,426 acres. The District purchased the Alpental Water System in 2001. Approximately 20 percent of the District’s service area is in King County and that area is surrounded by U.S. Forest Service land. It is unlikely the retail water service area in King County will change in the future.  The District holds no King County franchise for water distribution as none is needed, because the District does not use King County road right-of-way.  Water Use Efficiency  The District’s water system provides service to a residential population of 250 and a non-residential population of 5,096 through 466 customer service connections. The day-use skier population has a significant impact on commercial water use. Annual water production has averaged approximately 29.1 million gallons over the past five years. The District projects an increase in the number of service connections to 549 by 2018 and 724 service connections by 2032.  The recent annual average distribution system loss is approximately 6.3 percent, with a three-year average value of 7.2 percent which is less than the statutory standard of ten percent.  The Plan contains a six-year capital improvement program with an estimated cost of approximately $1.59 million. The funding sources for the proposed improvement projects include rates, water service fees, and bond proceeds.  Reclaimed Water  The District has less than 1000 connections and did not complete King County’s Reclaimed Water Checklist.  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 April 1, 2011, and there were no appeals. |

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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 (K.C.C.) 13.24.010 and 13.28 | Comments/findings |
| (1) | * Review is applicable to utilities that obtain or distribute water in unincorporated King County under K.C.C. 13.24. * Is there a need to meet the consistency requirements of RCW 43.20.260? | * Yes, the District 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. |
| (2) | * Consistency with King County Comprehensive Plan (KCCP) and development regulations, and policies including K.C.C. 21A.28.040 development standards, provision of adequate supplies for anticipated growth and development. | * Yes, the Plan is consistent. |
| (3) | * Infrastructure for existing and future service areas based on adopted land use map. | * Yes. The District used adopted land use maps for that portion of the service area within unincorporated King County. * The District did a full build out analysis and has water to meet future needs. In the Alpental area there are 94 existing connections and there will be 130 at full build out. |
| (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 District’s service area is not expected to change. * The District maintains duty to serve policies for its retail service area. |
| (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 all of its water from groundwater wells. |
| (6) | * Monitor and review effectiveness of purveyor conservation plans if within area covered by an approved coordinated water system plan (CWSP). | * Not applicable as the District is not in a CWSP area. |
|  | B. Consistency requirements: 13.24.060 |  |
| (7) | * State and local health requirements. | * Yes. |
| (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 has no interties with neighboring utilities. |

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| (10) | * Promotion of most healthful and reliable services to the public. | * Yes. Water purveyed by the District complies with public health standards. * The water is blended across the system to address arsenic from well four. |
| (11) | * Provision of service at a reasonable cost and maximization of use of public facilities. | * The District’s rates for water service are comparable to the rates charged by similar utilities. |
| (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. |
| (13) | * Applicable state water quality, water conservation, and waste management standards. | * The District’s water meets applicable water quality standards. * The three-year rolling average distribution system leakage is estimated at 7.2 percent, which is less than ten percent requirement established under the Municipal Water Law. |
| (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 District will maintain its existing conservation (efficiency) program to comply with DOH’s Water Use Efficiency Rule. |
| (15) | * Growth Management Act (GMA) (RCW 36.70A). | * The District appropriately used King County land use zoning for that area of King County it serves. |
| (16) | * Groundwater management plans. | * Not applicable. |
| (17) | * Federally approved habitat conservation plans and recovery plans under the Endangered Species Act (ESA). | * Not discussed in Plan. |
| (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 GMA. | * Yes. |
| (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 District is planning to accommodate full build out and is using reasonable growth rates for that part of unincorporated King County that it serves. |
| (22) | PF-2: Coordinate among jurisdictions and service providers to provide reliable and cost effective services to the public. | * Not applicable. |
| (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 District has sufficient water supply for the next six years and has a plan in place to obtain additional source to meet long-term supply. * Climate change is not mentioned. |
| (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. |
| (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. | * Not applicable. |
| (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. |
| (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 treats wastewater in the Kittitas County portion of the District. * The District recognizes reclaimed water as a means to conserve and extend the useful life of the potable water supply but does not currently use reclaimed water. |
|  | D: King County Comprehensive Plan |  |
| (28) | F-107: With special purpose districts or local service providers, plan for provision of services to rural areas. | * The plan provides adequate service to the rural area. |
| (29) | F-108: King County to work with cities and service providers to establish priority areas for public funding of capital facilities. | * The District and the County established priority areas through the capital facilities plan. |
| (30) | F-201: All facilities and services should be provided in compliance with provisions and requirements of the ESA 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. | * Yes. |
| (32) | F-210: capital facility plans and capital improvement programs for services to unincorporated King County are consistent with the KCCP. | * The District’s capital facility plan and capital improvement program for services to unincorporated King County 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. | * Yes, this is done. |
| (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. | * Not applicable. |
| (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 District 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. |
| (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, ESA response requirements and Clean Water Act requirements. | * The District does not have any interties. |
| (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. | * Not applicable. |
| (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 District 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;  c. the Regional Wastewater Services Plan; and  d. 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; 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. |
| (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. | * The Well Head Protection Program has been incorporated into the Critical Areas Ordinance. |