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| Review of the Sallal Water Association Water System Plan for 2020 | | |
| Plan Summary  The Sallal Water Association (Sallal) is a member owned, non-profit cooperative that operates a Group A water system adjacent to and within the easterly portion of North Bend, King County Washington. The system has approximately 1,664 connections. Two of the connections are master meters to the Wilderness Rim system, a Group A system serving 626 residential connections. The Association was incorporated in 1969. Originally, the Association’s water source was Seattle Public Utilities’ (SPU) Chester Morse Reservoir. Sallal has served groundwater exclusively since 1986. The two main sources are located north of Rattlesnake Lake in the SPU watershed. A third source is located to the east of Trucktown, just outside the east boundary of North Bend. A fourth well is scheduled to come online in 2021 between the two main sources.  Until the fall of 2019, Sallal provided non-chlorinated water to its members. In September/October 2019, *E. Coli* was found in one of its two major wells and elsewhere in the system; as a result, Sallal is now a chlorinated system, though the membership has expressed desire to return to non-chlorination.  Per the Plan, “Sallal is in negotiations with North Bend on the exchange of water between Sallal and  North Bend. The intent is to optimize the use of water between the two purveyors in the upper Snoqualmie Valley, while maintaining minimum instream flows in the Snoqualmie River.” Sallal and North Bend have been in negotiations since before 2010, with no results.  Service Area  The Association’s service area is located in the eastern part of King County and consists primarily of single-family residences. The Association has previously reduced its service area because it found it lacked capacity to provide water to the entire area, so it is now smaller than what is identified in the 1991 East King County Coordinated Water System Plan (CWSP). The service area includes an area that has been designated part of the Urban Growth Area (UGA) for the City of North Bend. The Association also sells water to the Wilderness Rim Maintenance Corporation (a subdivision entirely within the Association’s service area boundary) and has an intertie for emergency supplies with the Riverbend Homesites Association (another system located entirely within the Association’s service area boundary).  Sallal’s water service population at the end of 2018 was approximately 6,356 people served by 1,664 connections, for 2,678 Equivalent Residential Unit (ERU). Sallal has a water right for 696 acre-feet per year and 1,691 gallons per minute instantaneous capacity. The annual water rights are anticipated to be sufficient for increased demand to serve 3,334 ERU. At the projected growth rate, the water rights should be sufficient through 2032 (Chapters 2 and 4). The instantaneous water rights are anticipated to be sufficient through the planning period. Increased water use efficiency will allow Sallal to serve additional ERU as discussed in Chapter 5.  Water Use Efficiency  The Association uses water produced from three wells. Average daily production in 2018 was 412,255 gallons. The Association’s average water use per capita from 2010-2018 was 79 gallons per day (gpd). As an associate member of the East King County Regional Water Association, the Association’s proposed efficiency goals are to participate with other utilities in the Partnership for Water Conservation, maintain the water use per ERU and per capita consumption, and meet the state standard of less than 10 percent water loss. Under the 2008 King County Superior Court decision on the Municipal Water Supply – Efficiency Law of 2003, the Association is not considered to be a municipal water supplier.  Total expected ERUs at buildout in the service area are estimated at 3,818, which exceeds the current water right.  The three-year-rolling-average of Distribution System Loss (DSL) was 8.19%, which is an increase from a low average of 3.95% in 2014. The Association should carefully monitor this increase in DSL to avoid state-mandated water loss control programs should they exceed 10% DSL.  Capital Improvement Program  The Plan contains a 10-year capital improvement program (CIP) with the approximate cost estimated to be between $14.4 and $16.3 million. The Association proposes to fund its CIP projects with funds from sales of Association memberships, water sales, and funding from the U.S. Rural Development program. Budgeted operating revenue for 2020 is $1.3 million.  Sallal is deficient in storage. A new 240,000-gallon concrete reservoir is scheduled to come online in 2021. This reservoir will provide a modest storage surplus. The size and timing of the additional storage will depend upon the rate of growth and whether or not Sallal and North Bend come to terms on a water exchange contract.  Other major projects include a new well, a new headquarters facility, and a permanent intertie with North Bend. Future projects include water main replacement projects and an additional reservoir scheduled for 2024.  Reclaimed Water and Regional Planning The Association neither collects nor treats wastewater. The Association did not identify any opportunities for the use of reclaimed water. The system does include a few irrigators, but they do not consume a significant portion of the water used on an annual basis.  SEPA  The Association completed a State Environmental Policy Act (SEPA) checklist for the Plan. King County, as lead agency, issued a determination of non-significance for the issuance of the Plan on November 30, 2020. No comments were received on the SEPA notice. | | |
| 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 Ch. 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 district 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 Association’s Plan is subject to King County Council approval under RCW Ch. 70A.100 and King County Code. The Association provides water service to a part of unincorporated eastern King County and is within the East King County Coordinated Water System Plan (CWSP). * Although under the current King County Superior Court ruling in the Municipal Water Law – Efficiency Requirements (2003) lawsuit the Association is not a municipal water supplier, it still needs to demonstrate consistency for its 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 Association's Plan is consistent with County policies. | |
| (3) | Infrastructure for existing and future service areas based on adopted land use map. | * Yes, the Association used King County’s adopted land use maps for service in the unincorporated 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. | |
| (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, rules and regulations. | |
| (6) | Monitor and review effectiveness of purveyor conservation plans if within area covered by an approved CWSP. | * The Association is within the East King County Coordinated Water System Plan. * The Association’s water use efficiency plan identifies conservation activities which the Association employs as part of its long-range conservation plan. * The Association’s conservation measures include customer education, a water shortage plan, leak detection and notification, and a conservation rate structure. * **The Association should explore rebate and retrofit programs in the future.** | |
|  | **B. Consistency requirements: KCC 13.24.060** |  | |
| (7) | State and local health requirements. | * Yes; water has been chlorinated since 2019 to prevent further coliform contamination, and the district has a green operating permit from the State Office of Drinking Water. | |
| (8) | Creation and maintenance of logical service areas. | * Due to denials of water service by Sallal Water Association, the City of North Bend has offered to provide service to those rejected parcels. This creates a situation where Sallal’s service area would now, in effect, be bisected by North Bend’s area of new service. **The boundaries are not logical, but a necessary consequence.** | |
| (9) | Elimination or prevention of duplicate facilities. | * Where Sallal has not been able to provide service to new customers, the City of North Bend has offered to provide service. **This will result in duplicate but necessary facilities.** | |
| (10) | Promotion of most healthful and reliable services to the public. | * Yes. Water purveyed by the Association complies with DOH requirements. The water is chlorinated but not fluoridated. * No complaints have been reported in the last five years. | |
| (11) | Provision of service at a reasonable cost, and maximization of use of public facilities. | * Cost of service is comparable to other water purveyors in the region, although membership charges for larger water meters are much higher than comparable service. | |
| (12) | King County Comprehensive Plan and other pertinent county adopted plans and policies. | * Yes, there is general consistency between the Association's Plan and the King County Comprehensive Plan. | |
| (13) | 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 Association has not been involved in multi-basin water plans. * The Association does not have a wastewater utility. | |
| (14) | Applicable state water quality, water conservation, and waste management standards. | * Yes, applicable standards are met. The Association does coliform monitoring in keeping with State guidelines. * The Association's distribution system loss (non-revenue or unaccounted-for water) of 8.19% is below the statutory 10% standard. | |
| (15) | Water Resources Act (RCW Ch. 90.54). | * The Association will enact a new Water Loss Control Plan to comply with DOH’s Water Use Efficiency Rule. | |
| (16) | Growth Management Act (GMA) (RCW Ch. 36.70A). | * The bulk of the service area is within the County’s Urban Growth Area but the utility also serves the rural area beyond. | |
| (17) | Groundwater management plans. | * The Association obtains all of its source water from groundwater and has developed a Wellhead Protection Program. | |
| (18) | Federally approved habitat conservation plans and recovery plans under the Endangered Species Act (ESA). | * Not applicable, as the Association does not have surface water rights or discharges. | |
|  | Requirements for salmon recovery under RCW Ch. 77.85, and other plans, including regional water supply or water resource management plans. | * Not applicable, as the Association does not have surface water rights or discharges. | |
| (19) | **C: Countywide Planning Policies** |  | |
| (20) | G-4: Adopt comprehensive plans that are consistent with the Countywide Planning Policies as required by the Growth Management Act. | * Yes, the Association adopted a plan that is consistent with Countywide Planning Policies. | |
| (21) | EN-19: Promote energy efficiency, conservation methods and sustainable energy sources to support climate change reduction goals. | * Not discussed in Plan; they will consider energy efficiency on a project-by-project basis. | |
| (22) | 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 Association asserts it can accommodate adopted population and employment targets within its service area. | |
| (23) | PF-2: Coordinate among jurisdictions and service providers to provide reliable and cost-effective services to the public. | * Yes, the Association has an emergency-only intertie with Riverbend and North Bend, and provides wholesale service to Wilderness Rim. | |
| (24) | 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 Association’s plan includes various studies to look at long-term supply issues and is attempting to broaden its portfolio of mitigation and supply sources. | |
| (25) | 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. | * The Association’s service area includes the rural area beyond the UGA boundary; the lack of sewer service in the rural area will prevent further urban-density growth. | |
| (26) | 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 Association has been negotiating with the adjacent City of North Bend for 13 years with no agreement yet reached for integration of their systems.** | |
| (27) | 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 current water conservation and efficiency efforts of the Association meets the statutory minimum required by WAC Ch. 246-290. * The distribution system loss in 2018 was 8.19%, an increase from a low of 3.95% in 2014. **The distribution system loss meets the State maximum standard of 10% WAC Ch. 246-290.** | |
|  | PF-10: Encourage water reuse and reclamation, especially for high‐volume non‐potable water users such as parks, schools, and golf courses. | * The Plan does not consider reclaimed water use, as the utility does not produce reclaimed water, nor do they have a source of treated effluent. | |
| (28) | **D: King County Comprehensive Plan (KCCP)** |  | |
| (29) | F-107: With special purpose districts or local service providers, plan for provision of services to rural areas. | * The Association’s service area includes service within the rural area. | |
| (30) | 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 continue do this. | |
| (31) | 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. | * The Association’s provision of water service doesn’t rely on impaired waters or habitat; the Association meets the Clean Water Act through its compliance with DOH regulations. | |
| (32) | F-209: In the Rural Area, services provided by agencies should support a rural level of development and not facilitate urbanization. | * The Association’s service provision does not increase density in the rural area. | |
| (33) | F-210: capital facility plans and capital improvement programs for services to unincorporated King County are consistent with the KCCP. | * Yes, the Association's Capital Improvement Plan is consistent with the KCCP and future land use. | |
| (34) | F-211: King County helps coordinate development of utility facilities with other projects that utilize public rights-of-way and easements, where possible. | * **The Association has an active franchise with the County;** the Association may apply for a new one after adoption of this Plan. | |
| (35) | 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. | * The Association can meet the adopted growth targets in the area, but cannot meet the actual rate of growth. **No sub-area plan is required at this time, but a plan may be necessary if Sallal doesn’t get another water source online before the next planning cycle.** | |
| (36) | 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 Association did not identify an inability to meet service needs within its service area. | |
| (37) | 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 Association does not currently have any agreements with adjacent purveyors, other than wholesale agreements to Wilderness Rim. | |
| (38) | 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 Association affirms it can meet its duty to serve in the designated retail service area, which includes unincorporated King County, **but only in line with the established growth targets.** Two separate developments have been denied water by Sallal in the past two years. | |
| (39) | 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 Association has an emergency-only intertie constructed with North Bend, but requires additional negotiation and engineering to integrate the systems. * The Association supplies wholesale water to Wilderness Rim and has an emergency intertie with Riverbend. | |
| (40) | 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. | * The Association does not have any reclaimed water source. | |
| (41) | 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 RCW Ch. 77.85, water resource plans developed under RCW Ch. 90.54, watershed plans developed under RCW Ch. 90.82  , 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 Association'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. | |
| (42) | 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 RCW Ch. 43.20; and  c. Consistency with the service provisions of any applicable Coordinated Water System Plan, as adopted in King County Code Chapter 13.28. | * The Association is not expanding their service area. | |
| (43) | 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 Association does not control any surface water reservoirs or watersheds. | |
| (44) | 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 Association has developed a Wellhead Protection Plan to protect drinking water sources. * A large portion of the Association’s Wellhead Protection Area is within unincorporated king County. | |