May 17, 2011

By email to CPPUpdates@kingcounty.gov

Growth Management Planning Council
C/O Mr. Paul Reitenbach, King County DDES

Re: Comments and Proposed Changes on Draft Countywide Planning Policies

Dear Mr. Reitenbach:

Northshore Utility District is the water and sewer services provider to a population of over 60,000 in the City of Kenmore and portions of Kirkland, Bothell, Lake Forest Park, Woodinville and unincorporated King County. We are submitting the attached comments and proposed changes to the Draft Countywide Planning Policies for consideration.

Our district conducts annual service rate survey against other city and special purpose district water and/or sewer utilities in King County. Both our service rates and "connections served per employee" compare very favorably. We believe special purpose districts are some of the most efficient providers of such public services.

Sincerely,

Margaret R. Wiggins
Commissioner

Attachment
GMPC Members: Northshore Utility District, a member of the Washington Association of Sewer and Water Districts - King County Section IV, requests consideration of the below-identified proposed revisions to PFS-3, and comments on PFS-5 through PFS-10.

KC CPPs: Public Facilities and Services Chapter

Policies: February 23, 2011
Revised March 10  Text added: March 10, 2011

Overarching Goal: County residents in both Urban and Rural areas have access to the public services needed in order to advance public health and safety, protect the environment, and carry out the regional vision embodied in the Countywide Planning Policies.

Urban and Rural Levels of Service

The Growth Management Act (GMA) directs jurisdictions and special districts to provide public facilities and services to support development. The GMA distinguishes between urban and rural services and states that land within the Urban Growth Area (UGA) should be provided with a full range of services necessary to sustain vibrant and diverse communities while land within the Rural Area should receive services delivered at an intensity typically found in rural areas. Certain services, such as sanitary sewers, are allowed only in the UGA, except as otherwise authorized. The GMA also requires jurisdictions to determine which facilities are necessary to serve the desired growth pattern and how they will be financed, in order to ensure timely provision of adequate services and facilities.

PFS-1  (Alt 1-Original): Provide a full range of urban services in the Urban Growth Area to support the regional growth strategy and adopted growth targets. Limit the availability of services in the Rural Area called for in the regional growth strategy.

(CO-3)

Collaboration Among Jurisdictions:

More than 100 special purpose districts, including water, sewer, flood control, stormwater, fire, school and others, provide essential services to the residents of King County. While cities are the primary provider of services in the UGA, in many parts of the county, special purpose districts also provide essential services. Coordination and collaboration among all of these districts, the cities, King County, the tribes, and neighboring counties is key to providing efficient, high-quality and reliable services to support the regional growth strategy.

PFS-2  Coordinate among jurisdictions and service providers to provide reliable and cost-effective services to the public. (NEW/PFS-04)

PFS-3  Cities may be the appropriate providers of services to the UGA, either directly or by contract. Extend urban services through the use of special districts where there are agreements with the city in whose Potential Annexation Area the extension is proposed. Within the UGA, as time and conditions warrant, cities will assume local urban services provided by special
service districts if approved by the voters. (FW-13/PFS-05) Note: Special Purpose Water and Sewer Districts may be the only entity allowed to provide water and sewer service if the City in question has not been established as a provider of such service by a vote of the people.

Utilities

Utilities services include water supply, sewage treatment and disposal, solid waste, energy, and telecommunications. Providing these utilities in a cost-effective way is essential to maintaining health and safety of King County residents and to implementing the regional growth strategy.

A. Water Supply

Conservation and efficient use of resources are vital to the reliability and sustainability of the region’s water supply and imperative to ensure that resources will be available for future generations.

PFS-4  Plan for long-term water needs to address the potential impacts of climate change and to support growth. (NEW)

PFS-5  Support efforts to ensure that all consumers have access to a safe, reliably maintained, and sustainable drinking water source that meets present and future needs. (FW-31/PFS-06) Department of Health (DOH) regulations already cover this.

PFS-6  Coordinate water supply among local jurisdictions, tribal governments, and water purveyors to provide reliable and cost-effective sources of water for all users, including residents, businesses, fire districts, aquatic species. (CO-5/PFS-07) Department of Health (DOH) regulations already cover this.

PFS-7  Plan and locate water systems in the Rural Area so they are appropriate for rural uses and densities and do not increase the development potential of the Rural Area. (CO-16 PFS-03)

PFS-8  Recognize and support agreements with water purveyors in adjacent counties to to promote effective conveyance of water supplies and in securing adequate supplies for emergencies. (NEW/PFS-08) Department of Health (DOH) regulations already cover this.

PFS-9  Implement water conservation efforts to protect natural resources, reduce environmental impacts, and support a sustainable long-term water supply to serve the growing population. (CO-6/PFS-09)

PFS-10  Encourage water reuse and reclamation, especially for high-volume non-potable water users such as parks, schools, and golf courses. (CO-7/PFS-10)

This is neither necessary nor cost effective for the next 30 years.