

August 8, 2018

Mark Isaacson, Director
Sharman Herrin, Government Relations Administrator
Wastewater Treatment Division
King Street Center
201 S. Jackson St., Suite 500
Seattle, WA 98104

Re: Northern Diversion Interim Improvements

Dear Mark Isaacson,

Sammamish Plateau Water and Sewer District is appreciative of King County Wastewater Treatment Division's efforts to meet its service obligations under the waste treatment contract. The District is also appreciative of the recent efforts of the WTD staff to engage the District on its concerns over WTD policies and initiatives. As you are aware, the District has serious concerns over inequities in the County's administration of the regional wastewater treatment program.

The District continues to grow and add wastewater treatment customer base. As the District has expanded over the last decades, its wastewater comprehensive plans have aligned with the County's plans to ultimately divert flows northward to the Brightwater plant. In 2016, after collaborating with WTD staff, the District was advised the long awaited programming of the Northern Diversion was initiated by the County, and that the Northern Diversion would be constructed to meet the District's flow needs by 2028. It was disheartening to recently learn through the District's own research that the Northern Diversion has been reprogrammed. The project is now identified as a low priority under the County's Conveyance System Improvement Plan, and is scheduled for completion between 2050-2070.

In March 2018, WTD staff requested the District participate with the County to conduct a consultant's evaluation to update the District's 2016 North Diversion Interim Improvement Evaluation Report. The study would analyze additional options to construct improvements to the District's local wastewater treatment system which would allow for the deferral of the County's Northern Diversion Project. The District Board has considered the WTD request and has authorized the following response and proposed for participation:

- The District is willing to continue to collaborate with the County to evaluate options to facilitate the county meeting its service obligations under the existing waste treatment contract.
- The programming of the proposed study update would be fully funded by the County, including reimbursement of District staff time to participate in the update.
- Programming of the proposed study would be subject to District staff availability. As such, the District does not anticipate having staff capacity to support the study until late 2018 or early 2019.

- As stated in the District's September 26, 2016 letter to the County when transmitting the original Northern Diversion Interim Improvement Evaluation to the WTD staff, the District is not inclined to invest District funds in any interim improvements in light of the County's obligation to serve, the County's awareness of the District's conveyance needs, and the District's history of aligning system plans with County plans to divert flows north.
- Compared to other regional wastewater agencies, the District has one connection point to the regional system. This has required the District to design, construct, and maintain additional local infrastructure which may not have been necessary if the County had met its basin level of service policy with respect to the District. Any evaluation must also include consideration and agreement by the county to satisfy its basin level of service standard and assume ownership of conveyance facilities as required to bring equity to the District.
- The District would expect that any interagency discussion and agreement regarding County construction of interim improvements, or assuming infrastructure ownership to meet the level of service basin criteria, would be a matter of contractual interaction between the District and County, as opposed to an issue referred to MWPAAC or the proposed operating board which does not currently exist.

Although the District is willing to cooperate in evaluating interim improvements to allow the County to defer on constructing that Northern Diversion, the District's Board is concerned that any reprogramming of the Northern diversion contradicts the aligned plans of the two agencies and that interim improvements may essentially becoming permanent in nature. The Board has also noted that the District's wastewater plan has been submitted to King County and approved on multiple occasions, including plans to divert flow to the County's planned Northern Diversion. Deferral on the project contradicts the long-range plans of the District and Wastewater Treatment Division. If the interim improvements cause the Northern Diversion to become deferred for thirty (30) to fifty (50) years as depicted in the Wastewater Treatment Division's capital plans, the District will seek assurance from the County that it will be provided a level of service equal to other wastewater utilities served by the regional system.

The District looks forward to continuing to work with WTD to meet its capacity needs. The District also encourages the County to continue to review its obligations under the waste treatment contact as the District continues to grow and experience capacity needs.

Sincerely,



John C. Krauss

General Manager

cc: SPW Board of Commissioners

SPW District Attorney

Kathy Lambert