

Lori Barnett

From: Lori Barnett
Sent: Friday, September 11, 2009 3:58 PM
To: Jim Robins (jim@docosewer.org); Verla Janes (verla@docosewer.org); Briz@ewwd.org; Dan Day (dday@dcpud.org)
Subject: services to potential urban growth expansion areas
Importance: High

The county planners and I have been working on the urban growth area (UGA) expansion project again. It looks like the potential expansion areas are pretty close to the areas that we looked at earlier this year. Changes were made to the Douglas County Regional Policy plan in July that require more coordination with utility purveyors prior to processing UGA expansions.

Would you four be available to sit down next **Tuesday, September 15 at 3:30** in our Conference Room and look over the map to start putting together a plan to provide services to the potential areas. Douglas County included the following language in the memorandum of understanding regarding the city's work on the UGA expansion:

Prior to commencing a 60-day review period for the expansion of the East Wenatchee Urban Growth Area, the City of East Wenatchee shall meet with and request that all local public service providers including sanitary sewer, public water, and electrical, provide written comments that urban services can be provided to the expansion area within the planning horizon of the comprehensive plan. Comments should identify whether existing infrastructure has the capacity to accommodate the planned growth. Where existing capacity is insufficient, comments should address necessary infrastructure improvements, funding sources and the steps necessary to plan and provide infrastructure improvements.

I will be leaving for vacation after Sept. 18 and want to start the process so you will have plenty of time to respond. In October, I will need to have the information to help refine the boundaries and any staging that may be necessary.

If you are unable to meet on that date, please provide an alternative date. Greg mentioned that he will be gone after Wednesday.

*Lori Barnett
City of East Wenatchee
Community Development Department
271 9th St. NE
East Wenatchee, WA 98802
Phone 509.884.5396 Fax 509.886.6113*

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COMMISSIONERS:
Michael T. McCourt
Terry Barnes
John Sterk

Greg Brizendine, Manager

East Wenatchee Water District

(509) 884-3569 • Fax (509) 886-0550 • 692 Eastmont Avenue • P.O. Box 7190 • East Wenatchee, WA 98802-7190

October 15, 2009

City of East Wenatchee
Attn: Lori Barnett, Director
221 9th Street NE
East Wenatchee, WA 98802

RE: Comments on DRAFT East Wenatchee Area Comprehensive Plan

Dear Lori,

At our meeting of 9-15-09 we briefly reviewed you proposed changes to the text of the updated Comprehensive Plan (Goals and Policies), including a few maps of Proposed Zone changes (Option 1 Vertical and Option 1 Horizontal).

You requested that the Douglas County Sewer District and the East Wenatchee Water District provide you with any comments/edits that we would recommend to the Draft text. Including any comments on how we would propose serving new areas added to the UGA maps.

First, comments on the text portion of the Comprehensive Plan.

For public health and safety I would suggest that we have some language added to the plan that would prohibit people from drilling private wells for domestic uses or constructing private fire storage within the UGA.

Second, there are several places (UG-9, C-16, H-22) that state:

“If the property is located outside of the service district boundary of a utility, annexation into the service district must occur prior to development of the property.”

I would suggest that you remove these referenced elements (as inapplicable) for the following reasons: First, utilities are expressly authorized to provide service outside their boundaries notwithstanding the absence of an annexation under Title 57; And, secondly, the annexation is discretionary with the utility under RCW 57.24 taking into consideration all other laws which may affect the provider.

Changes/additional areas on Option 1 maps:

As you know our comprehensive plan addresses our infrastructure needs and anticipated higher population growth than we have seen in the last 3 years. I think we are doing good and in most cases ahead of schedule on the water system capital improvements. We are also working together at the Regional Water level to obtain additional water rights even though we are good for at least 20 years.

Any new development, whether inside or outside, the UGA will be required to provide infrastructure improvements necessary to serve their proposal and meet our comprehensive plan goals and standards. This includes any offsite improvements required.

Thank you for providing the DRAFT sections for my review and comment. If you would like to meet and discuss the above please give me a call when you return from your vacation.

Sincerely,

Greg Brizendine
Manager

Douglas County Sewer District No. 1

P.O. Box 7129 ♦ 692 Eastmont Avenue
East Wenatchee, WA 98802

October 14, 2009

RECEIVED

City of East Wenatchee
Attention: Lori Barnett, Director of Planning
and Community Development
221 9th Street, N.E.
East Wenatchee, WA 98802

EAST WENATCHEE
CODE COMPLIANCE

Re: Comments on Greater East Wenatchee Area Comprehensive Plan
(Draft Dated February 13, 2009)

The Board of Commissioners of the Douglas County Sewer District No. 1 (the "District") respectfully provides these comments to the City of East Wenatchee (the "City") on its proposed Greater East Wenatchee Area Comprehensive Plan (Draft dated 2/13/09) (the "Draft Comprehensive Plan"):

The District last updated its General Sewer Comprehensive Plan in February 2006. At that time, the District Comprehensive Plan provided as follows:

The District boundaries encompass approximately 5,430 acres, of which about 3,400 acres currently are served with sewers.

The general concern of the District is balancing the desire to serve future growth in areas adjacent to the current Urban Growth Area ("UGA") with the need to preserve District waste water treatment plant capacity to serve areas already located within the District that are not yet connected to the District system. Because of the nature of development in the Greater East

Wenatchee Area, it is difficult to determine precisely when areas not presently served by the District system may be proposed for more urbanized greater density development which will require District services. If all of the property within the current District boundaries sought connection to the District system within the next five (5) years, the District may have difficulty upgrading its treatment plant capacity within a timeframe reasonable enough to accommodate all of this development.

Because all of the areas within the Urban Growth Area, but outside of the District's current service area, are in unincorporated Douglas County (the "County"), the District has worked with the County to address development issues over the past several years. Most recently, the District and County arrived at a reasonable resolution of how to address developments of this nature as documented with respect to a specific development known as the Oakwood Subdivision, also known as CMH Homes, Inc. In a letter from Doug Bramlette, County Engineer, and Mark Kulaas, County Planning Director, to District Manager Jim Robins dated October 21, 2008, the resolution of the issues is documented. A copy of this letter is enclosed for your information. As part of this process, the County and District resolved that rather than attempt to plan and construct dry line sewers in areas not presently connectable to the District system, a 15 foot easement located outside of the right-of-way and behind the sidewalks would be appropriate. This would allow for development of the area at proposed densities and permit future installation of an appropriately placed sewer line and appurtenances without the need for disturbing the roadway surface and sidewalks, disruptions that could prove costly for the future homeowners. As a part of these developments, a no protest to Local Improvement District and/or Local Utility Improvement District was implemented and at the request of the

County, not the District, a waiver of right to protest annexation to the District was executed by the property owners. As District Commissioners, we support this collaborative effort of dealing with developments within the Urban Growth Area that are not yet connectable to the District sewer system.

The District, County, and developer all agreed that putting in a dry line sewer, without regard to what elevations may be needed to serve the developing properties with sewer in the most reasonable and economically feasible manner was not the best use of resources and could lead to the non use of the line or need for removal and replacement of the line prior to its use.

While these comments are of a general nature and identify how matters are dealt with at the present time, the District in its planning efforts will comply with Draft Comprehensive Plan provision UG-16 as it always has. This particular provision, as revised, will require the District in preparation of its Comprehensive Plan to anticipate connection to the District system of all property within the proposed UGA within the next 20 years. As indicated above, this is potentially problematic as 100% maximum density development of the area already served by the District would conceivably consume all of the District's reasonably available treatment plant capacity.

The above comments also address Draft Comprehensive Plan Provision H-13 a, b, c, and d. The District is opposed to installation of dry lines as proposed in Draft Comprehensive Plan Provision H-13(b) and supports revision of this provision to read as follows:

(b) “Dry lines” for centralized public collection are installed at the time of development to facilitate eventual connection to sanitary sewer or a 15 foot easement is granted in favor of the sanitary sewer service providing utility and a binding commitment guaranteeing installation of the line by the developer or its successors is executed by the developer and the sewer utility service provider and filed of record.

Adding this language and the above comments are also consistent with Draft Comprehensive Plan Provision UG-7. Sewer Goal 4 under the Draft Comprehensive Plan, Provision UT-19 should be revised to be consistent with the above comments of the District.

Draft Comprehensive Plan Provisions C-16, UG-9, and H-22 each essentially provide as follows:

If the property is located outside of the service district boundary of a utility, annexation into the service district must occur prior to the development of the property.

Presently state law does not require annexation into the District before District services may be extended to serve the property. The District wants to make sure that the City and any property owners recognize that the present rate structure of the District includes base fees for waste water treatment plant use and specific local facilities charges applicable to certain areas which are more costly to serve and for which the District has expended reserves to facilitate extension of District mainlines to serve those properties. Annexation of property into the District will not affect the District’s continued use of rate structures which require greater payments by those receiving greater specific benefits as a result of costs expended by the District to serve those properties. This is particularly true of extensions recently made to serve properties to the North of the city limits and may be true with respect to properties to be served in the “North

Bridge Commercial Area” referenced in proposed C-19(b) at page 44 of 140 of the Draft Comprehensive Plan.

The District has generally not opposed annexation of property served by the District into the District. Annexation of property into the District which serves it permits property owners to participate in District operations by participating in the election of the District Commissioners. By the same token, the District Commissioners are not proponents of forcing individual property owners into decisions to annex.

The District has agreed to the execution of No Protest Annexation Agreements when those have been requested by the County and the developer in an effort to facilitate property development.


The District Board is opposed to Draft Comprehensive Plan Provision UT-20 which provides as follows:

Periodically, as the City grows and develops, it should review its potential for assuming Douglas County Sewer District No. 1 and the implications associated with doing so.

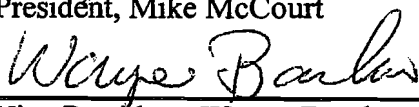
The District has been the only sewer service provider to the City and the Greater East Wenatchee Area since it was formed in 1958. The City has never owned or operated a sewer system and with the single exception of its participation in a County-City combined storm water utility, the City does not presently provide any utility services. The City contracts with Waste Management for its garbage and recycling collection services, the City water utility services are

provided by the East Wenatchee Water District, and the City electrical services are provided by the Douglas County Public Utility District No. 1. The District Board and management have kept rates reasonable and have operated within budget limits in our recent difficult economic times. By contrast, the City has openly admitted to struggling with budget issues over the past several years, and there is no apparent relief to the continued struggle in the reasonably foreseeable future. Adding a well organized, fully self-sustaining independent utility service to the City's difficult financial environment may not be in the best interest of the District's utility customers. The District is concerned why the City would want a provision of this nature in its Draft Comprehensive Plan when there has never been any public support expressed for this idea.

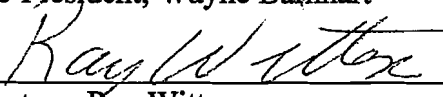
DOUGLAS COUNTY SEWER DISTRICT BOARD OF COMMISSIONERS



President, Mike McCourt



Vice-President, Wayne Barnhart



Secretary, Ray Witten

