

MEMORANDUM

DATE: June 12, 2013

TO: Erika Conkling, Senior Planner – City of Renton

FROM: Kevin Gifford, AICP – Associate
Lisa Grueter, AICP – Manager

RE: Comprehensive Plan Utilities Element

Issue

What should be updated in the Comprehensive Plan Utilities Element?

Recommendation

Update the Utilities Element to:

- Amend and include appropriate policies reflecting adopted functional plans that have been approved since Utility Element preparation;
- Account for non-City providers in water and wastewater services that are now serving annexed areas of the city and will continue to do so; and
- Include appropriate policies from the Environment Element regarding surface water management, wetland buffers, groundwater quality, flood hazards, drinking water aquifer protection and recharge, and solid waste management.

For City-managed utilities, adoption by reference of component functional plans should be considered to streamline the Element and ensure continual consistency between the Comprehensive Plan and functional plans.

Background Summary

The Renton Comprehensive Plan Update is due to the Washington State Department of Commerce in June 2015. The function of the Utilities Element of the Comprehensive Plan is to ensure that utility systems are adequate to serve both existing residents and anticipated growth within the city. In addition, the Utility Element serves as coordinating document between the functional plans prepared for the City's various utilities systems. The objectives for updating the Utilities Element include the following:

- Update background information for City-provided and non-City service providers, targets, and existing conditions;
- Ensure consistency with federal state, regional, and county planning efforts;
- Integrate applicable policies from the current Environmental Element, as well as from adopted functional plans for each major utility system;
- Write policies that provide clear direction for City decision making that are easily understood and communicated; and

- As part of the overall effort to streamline the Utilities Element and provide for greater consistency between the Comprehensive Plan and functional plans, consider an approach of incorporating functional plans by reference.

Functional Plan Update Process and Relationship to the Comprehensive Plan

The City's water, wastewater, and surface water management utilities maintain functional plans for individual utility systems as required by State Law (e.g., WAC 246-290 for Public Water Systems). The City's solid waste utility does not maintain its own functional plan, but it operates under King County's Comprehensive Solid Waste Management Plan through an interlocal agreement, and overall solid waste policy for King County is guided by the Metropolitan Solid Waste Advisory Committee.

Non-City utility providers, such as those for electricity, natural gas, and telecommunications, conduct their own system planning efforts, which are not directly related to the City's Comprehensive Plan. These functional plans contain detailed inventories of infrastructure, as well as forecasts for future service availability.

Functional plans for City-operated utilities are tied to the City's adopted Capital Improvement Program, which, by law, is updated every six years. In contrast, major updates of the City's Comprehensive Plan are conducted every eight years. This difference in update cycles makes it difficult to keep changing system information consistent between functional plans and the Comprehensive Plan.

In addition, the Land Use and Community Planning elements of the City's Comprehensive Plan have established policies for planning based on neighborhoods and centers. In contrast, utilities are generally provided by city-wide or regional systems that may not correspond with neighborhood boundaries, and changes to one portion of the system may affect residents in other areas of the service area. Therefore, while utility functional plans may be amended in response to increased development in specific neighborhoods or centers, their function is to ensure that adequate utility service is available to all residents and businesses.

Utilities Planning Requirements

Unlike other topic areas, such as land use, housing, or transportation, State, Regional, and County requirements for local utility planning are relatively minor. Utility planning policy requirements from County and Regional plans are summarized below.

Growth Management Act

The Growth Management Act (GMA) establishes requirements for what is to be addressed as part of a local jurisdiction's periodic comprehensive plan updates. The Washington Department of Commerce publishes a checklist for cities that summarizes these requirements and helps local jurisdictions ensure that they have adequately complied with GMA. A Utilities element is required to be consistent with relevant Countywide Planning Policies and include information on the general current and proposed locations of all utilities, as well as approximate capacity.

Publicly owned utility systems, such as water, wastewater, stormwater, and solid waste management facilities, should also be inventoried in the Capital Facilities Element, and any planned improvements to these systems should be reflected in the 6-Year Capital Facilities Plan.

King County Countywide Planning Policies

King County in consultation with each city has established a series of countywide planning policies for provision of utilities in a manner that is consistent with the County's regional vision. These policies are summarized below by utility type.

Water

- Water efficiency and conservation measures should be implemented to support long-term water supply for growing population.
- Water service in rural areas should be planned in a way that provides service appropriate for rural uses without increasing development potential to urban levels.

- Water service systems should be coordinated between providers to ensure adequate supply for emergencies¹.

Wastewater

- Municipal sewer service is required within Urban Growth Areas and is prohibited outside it except as necessary to address health and safety issues.
- Wastewater service provided in rural areas should not increase development potential to urban levels.

Solid Waste

- The waste stream should be reduced, and reuse/recycling should be encouraged.

Energy

- Overall energy consumption should be reduced through conservation and efficiency measures.
- Renewable and alternative energy resources should be promoted.

Telecommunications

- Local jurisdictions should plan for provision of telecommunication infrastructure to support future growth in a manner consistent with the countywide vision.

PSRC VISION 2040

The Puget Sound Regional Council (PSRC) reviews comprehensive plans for consistency with Vision 2040 which also serves as multicounty planning policies for King, Pierce, and Snohomish counties under GMA. The PSRC publishes a checklist to assist jurisdictions with their plan updates. The portion of the checklist regarding public services is summarized below:

- Efficient use of existing utility services should be encouraged, including use of demand management strategies.
- Use of renewable energy and alternative energy resources should be promoted.
- Plans should include provisions to meet long-term water needs, including conservation, reclamation and reuse programs.

Key Issues and Suggested Revisions

Table 1 summarizes the current status of each major utility system in Renton, planning issues identified by City staff or utility provider representatives, and suggested revisions to the Utilities Element to address said issues, as well as update and streamline the Element.

¹ Water supply through emergency interties is limited in both quantity and duration during an emergency event. Locally developed policies will reflect that some prioritization of service and water restriction measures will be necessary.

Table 1. Utilities Element Key Issues and Suggested Revisions

Topic	Current Status	Issues	Suggested Revisions
<p>Water</p>	<p>The City’s Comprehensive Water System Plan was updated in 2012. Water demand has been projected to 2071.</p>	<ul style="list-style-type: none"> ● Due to annexations in the Benson Hill and East Renton Plateau areas, approximately 28% of the City is now served by non-City water providers. The two largest are Soos Creek Water and Sewer District and King County Water District #90. 	<ul style="list-style-type: none"> ● Review existing policy language for consistency with the updated water system functional plan and amend general policies to match. ● Match the City’s updated growth targets for 2031/2035 to the assumptions in the Water System plan through a technical memo for the record. ● Remove technical system information from the body of the Element and adopt the functional plan by reference.

Topic	Current Status	Issues	Suggested Revisions
Wastewater	The City's Long-Range Wastewater Management Plan was updated in 2010.	<ul style="list-style-type: none"> ● Due to annexation of the Benson Hill area in 2008, a large area in the southern portion of the city is served by Soos Creek Water and Sewer District, not the City's wastewater utility. ● Though not yet annexed, the City has extended wastewater service to the East Plateau Potential Annexation Area. ● The 2010 functional plan update concluded that a large proportion of the wastewater collection system has reached or is nearing the end of its useful life and will require replacement in the near future. ● King County regional wastewater infrastructure passes through Renton. 	<ul style="list-style-type: none"> ● Review existing policy language for consistency with the updated wastewater system functional plan and amend general policies to match. ● Match the City's updated growth targets for 2031/2035 to the assumptions in the Wastewater Management Plan through a technical memo for the record. ● Remove technical system information from the body of the Element and adopt the functional plan by reference. ● Include policies requiring coordination between City staff and King County where regional wastewater infrastructure may be affected.
Surface Water	The City is in the process of preparing a Comprehensive Surface Water Management Plan, but it is not yet complete.	<ul style="list-style-type: none"> ● The new NPDES Phase II Municipal Stormwater Permit for Western Washington, issued by the Department of Ecology in 2012, contains new requirements for the implementation of LID best management practices, which could potentially affect how development in the City occurs, as well as more specifically the quantity and quality of runoff infiltration into the local aquifer. 	<ul style="list-style-type: none"> ● Integrate City NPDES program goals into Element. ● Consider if draft SWM policies are appropriate to vet in the Utilities Element Update. ● If the new NPDES requirements result in changes to quality or quantity of runoff and infiltration, the City's aquifer protection regulations should be reviewed and updated.

Topic	Current Status	Issues	Suggested Revisions
<p>Solid Waste</p>	<p>King County Solid Waste Division has published the Final Draft of its 2013 update to the Comprehensive Solid Waste Management Plan (CSWMP). The City has an interlocal agreement allowing the County to plan in consultation with the cities.</p> <p>The City of Renton is currently a partner in the King County Local Hazardous Waste Management Program (LHWMP), which works to reduce public health risks related to hazardous materials.</p> <p>The City contracts with Waste Management, Inc. for solid waste collection in most of Renton; Allied/Republic Services collects solid waste in recently annexed areas.</p>	<ul style="list-style-type: none"> ● How best to integrate the King County CSWMP such as whether it should be adopted by reference. ● The relationship between the Utilities Element and the King County LHWMP is unclear. 	<ul style="list-style-type: none"> ● Update Utility Element narrative to reflect current solid waste collection franchise information. ● Clarify relationship between the King County CSWMP and the Utilities Element. Review policies in the CSWMP for potential inclusion in the Utilities Element. ● Clarify relationship between the King County LHWMP and the Utilities Element. No policies are available for incorporation, but policy guidance may be available.

Topic	Current Status	Issues	Suggested Revisions
Electricity²	<p>Puget Sound Energy (PSE) provides electric service in Renton. PSE filed their 2013 Integrated Resource Plan with the Washington Utilities and Transportation Commission (WUTC) in May 2013. PSE’s plans are based on their regional service area, which includes most of the Puget Sound and portions of Eastern Washington.</p> <p>Seattle City Light serves a small portion of northwestern Renton near the Skyway area. Seattle City Light updated its Integrated Resource Plan in 2012.</p>		<ul style="list-style-type: none"> Update Utility Element narrative to reflect current electric infrastructure status and electricity demand estimates.
Natural Gas³	<p>Puget Sound Energy (PSE) provides natural gas service in Renton. PSE filed their 2013 Integrated Resource Plan with the Washington Utilities and Transportation Commission (WUTC) in May 2013. PSE’s plans are based on their regional service area, which includes most of the Puget Sound and portions of Eastern Washington.</p>		<ul style="list-style-type: none"> Update Utility Element narrative to reflect current natural gas infrastructure status and gas demand estimates.

² Information on issues for electricity is pending contact with PSE representative.

³ Information on issues for natural gas is pending contact with PSE representative.

Topic	Current Status	Issues	Suggested Revisions
Telecommunications	<ul style="list-style-type: none"> • Phone service in Renton is provided by CenturyLink (formerly Qwest Communications). CenturyLink also provides internet service, as well as satellite television service through DirecTV. • Cable television and broadband internet services are provided by Comcast. • Cellular telephone service is provided by AT&T, Verizon Wireless, T-Mobile, and Sprint. 		<ul style="list-style-type: none"> • Update Utility Element narrative to reflect changes in franchise holders, company names, and service offerings.
Sunset Area Community	Utility capital facility improvements for the Sunset Area Community were identified in the 2010-2011 EIS. These capital facility needs have been incorporated into the Capital Facilities Element.	Through the Comprehensive Plan Update, it is appropriate to consider how to integrate the Sunset Area Community discussion into the more streamlined element.	See left.
Related Environment Element Policies	Twenty-five objectives and policies from the current Environment Element have been identified as being appropriate for inclusion in the updated Utilities Element.	Some of these policies may be better located in the Land Use Element if they are intended to more broadly apply across the City rather than to utilities only (e.g. wetlands).	As policies are considered for integration, some may be flagged for inclusion into the Land Use Element or another appropriate location.

Preliminary Utility Element Outline

The Element will have brief narrative and focus on policies. We suggest that some of the analysis identified in Table 1 be part of a technical memo that can be an appendix or included in the City's public record without belaboring the actual element.

Introduction

- Overview of the utility systems that exist in Renton, including both City-owned utilities and non-City service providers.
- Discussion of relationship between the Utilities and Land Use Elements.
- Overview of major issues and challenges for provision of adequate utility service.

Goal Statement

- Facilitate the development and maintenance of all utilities at levels of service appropriate to accommodate future anticipated growth while protecting natural ecosystems and environmental quality.

General Policies

General policies are intended to promote safe and efficient utility service, regardless of whether they are City-owned or delivered by a non-City provider. These policies also focus on coordination between utility providers, both within the City and with adjacent jurisdictions. Relevant policies from the existing Environment Element will also be incorporated.

City-Managed Utilities

This section contains a brief discussion of each of Renton's City-managed utilities and their associated functional plans, which could potentially be adopted by reference.

Water

DISCUSSION

- Capacity of existing water system and adequacy of current and future (50-year) water supply.
- Projected water demand over the planning period.
- Overview of planned system improvements.

POLICIES

General policies on the following topics would be enumerated in the Utilities Element. Additional specific policies would be contained within the water system functional plan.

- Consistency of water supply, infrastructure, and services with the City's growth projections and the future land use concepts described in the Land Use Element.
- Coordination with non-City water providers operating within Renton and coordination with neighboring jurisdictions where Renton has extended water service.
- Coordination of water service extensions with expected growth and development.
- Planning for adequate water supply to meet both average daily peak demand and emergency needs.
- Planning for water resources management, water conservation, and water use efficiency.
- Consistency with the City's Wellhead Protection Plan and Aquifer Protection Program to ensure that groundwater quality is not negatively impacted by development and redevelopment.

- Incorporation of relevant policies from the existing Environment Element.

MAPS

- Map of City Water retail water service area and adjacent service providers.

PLANS ADOPTED BY REFERENCE

- City of Renton Comprehensive Water System Plan (Amended 2012).

Wastewater

DISCUSSION

- Capacity of the existing wastewater system.
- Need and timing of replacement of older, deteriorating sewer facilities.
- The City's Infiltration/Inflow (I/I) management program and coordination with King County's regional (I/I) program.

POLICIES

General policies on the following topics would be enumerated in the Utilities Element. Additional specific policies would be contained within the wastewater functional plan.

- Consistency of sewer facilities and services with the City's growth projections and the future land use concepts described in the Land Use Element.
- Coordination with non-City sewer providers operating within Renton and coordination with neighboring jurisdictions where Renton has extended sewer service.
- Coordination of sewer service extensions with expected growth and development.
- Prioritization of sewer system improvements in areas of the City anticipated to experience high levels of growth.
- Timely extension of the sewer system within the City's service area to meet public health requirements.
- Staffing commensurate with the size of the wastewater system and the number of residents served.
- Incorporation of relevant policies from the existing Environment Element.

MAPS

- Map of City wastewater service area and adjacent service providers.

PLANS ADOPTED BY REFERENCE

- City of Renton Long-Range Wastewater Management Plan (2010).

Surface Water

DISCUSSION

- Capacity and condition of existing drainage system.
- NPDES Phase II permit and Stormwater Management Plan requirements.
- Relationship of the Utilities Element to the City's aquifer protection regulations.

POLICIES

Surface Water policies from the existing Utilities Element, as well as the draft Surface Water Comprehensive Plan will be reviewed for inclusion in this section. Surface Water policies will address the following topics:

- Provision of surface water management systems to minimize impacts on natural systems and prevent erosion and sedimentation.
- Retention of natural riparian vegetation.
- Public education about surface water issues.
- Reduction of pollutant loading in stormwater runoff.
- Coordination with adjacent jurisdictions and state and federal agencies on implementation of the requirements of the NPDES Phase II Permit.
- Incorporation of relevant policies from the existing Environment Element.

MAPS

- Map of water bodies, drainage basins, and flood hazard areas within the City.

PLANS ADOPTED BY REFERENCE

- Surface Water Management Comprehensive Plan (when complete).

Solid Waste

While solid waste collection is managed by the City, who contracts collection of garbage, recycling, and yard waste to Waste Management, Inc., the City maintains an interlocal agreement with King County for disposal of collected solid waste. This interlocal agreement also authorizes King County to include Renton in its Comprehensive Solid Waste Management Plan.

DISCUSSION

- Overview of solid waste collection and disposal in the City.
- Relationship to King County's Solid Waste Division and the County's Comprehensive Solid Waste Management Plan.
- Description of solid waste facilities in the Renton vicinity, including estimated capacity.

POLICIES

Solid Waste policies from the existing Utilities Element, as well as the County's draft Comprehensive Solid Waste Management Plan will be reviewed for inclusion in this section. Solid Waste policies will address the following topics:

- Goals for reduction of the residential and commercial waste streams.
- Coordination with King County Solid Waste Division and other regional entities for planning for solid waste collection and disposal.
- Protection of natural resources, including water and air quality, as part of solid waste collection and disposal.

MAPS

No maps recommended.

PLANS ADOPTED BY REFERENCE

King County Comprehensive Solid Waste Management Plan (2013 – Currently in Final Draft).

Non-City Managed Utilities

Non-City managed utilities operating within Renton conduct their own planning processes and maintain their own systems with limited involvement from the City, and expansion of these systems is often driven by consumer demand and not solely on regional growth forecasts, though those are considered. Due to the disparate nature of these service providers and the variety of planning documents produced by each, adoption of functional plans by reference may not be feasible.

Electric

DISCUSSION

- General description of providers in Renton and location of major infrastructure.
- Description of any interlocal agreements or regional partnerships affecting provision of electrical service in the City.

POLICIES

Policies should address the following topics. Where available, functional plans of non-City providers will be reviewed for inclusion in this section.

- Coordination with local and regional providers to ensure that system planning is consistent with anticipated growth.
- Implementation of energy conservation programs and measures.

Natural Gas

DISCUSSION

- General description of providers in Renton and location of major infrastructure.
- Description of any interlocal agreements or regional partnerships affecting provision of natural gas service in the City.

POLICIES

Policies should address the following topics. Where available, functional plans of non-City providers will be reviewed for inclusion in this section.

- Coordination with local and regional providers to ensure that system planning is consistent with anticipated growth and that location of transmission infrastructure is done safely.
- Implementation of energy conservation programs and measures.
- Protection of groundwater resources where gas pipelines cross aquifer recharge areas.

Telecommunications

DISCUSSION

- General description of providers in Renton and location of major infrastructure.
- Description of any interlocal agreements or regional partnerships affecting provision of telecommunications service in the City.

POLICIES

Policies should address the following topics. Where available, functional plans of non-City providers will be reviewed for inclusion in this section.

- Coordination with local and regional providers to ensure that planning is consistent with anticipated growth.
- Promotion of aesthetic standards for telecommunication structures.