



November 4, 2025

Hon. Nick Brown  
Attorney General  
Office of the Attorney General  
1125 Washington Street SE  
P.O. Box 40100  
Olympia, WA 98504-0100

RE: Comments on Proposed Updates to the Public Records Act Model Rules (WAC 44-14)

Dear Attorney, General Brown,

On behalf of Cross Valley Water District, which serves 23,500 customers in Southeast Snohomish County, we appreciate the opportunity to provide comments on the proposed updates to the Public Records Act (PRA) Model Rules. As a Water and Sewer District, we fully support the goals of transparency, accountability, and public trust that underpin the PRA.

However, several elements of the proposed rule revisions could unintentionally create significant administrative and financial burdens for our District. These added requirements could divert scarce resources away from essential utility operations and customer service functions that directly benefit ratepayers. Additionally, these costs place a disproportionate burden on low-income customers and conflict with the State's ongoing efforts to reduce affordability challenges for essential utility services.

#### **Maintain Practicality and Proportionality**

Many Districts like ours manage multiple responsibilities such as billing, budgeting, customer service, and board support. At Cross Valley Water District, the two employees who are primarily responsible for responding to public records requests are the General Manager and the Administrative Supervisor, who are also responsible for many other key functions and tasks for the District. The model rules must reflect this diversity and ensure that compliance expectations remain scalable to agency capacity. Encouraging "best practices" is appropriate—but rigid expectations such as "one-day fulfillment" or "sufficient staffing" risk becoming de facto mandates that small agencies cannot meet.

Similarly, any implication that agencies should maintain centralized, enterprise-wide electronic records systems is concerning. These systems can be expensive to acquire,



## Conclusion

Cross Valley Water District strongly supports the principles of open government and the responsible administration of the Public Records Act. We respectfully urge the AGO to finalize rules that are flexible, scalable, and supportive of small-agency realities—balancing transparency with operational practicality. We welcome the opportunity to collaborate with AGO staff and partner organizations to develop training and implementation materials that advance these shared goals.

Sincerely,



Mike Johnson

General Manager

Cross Valley Water District

8802 – 180<sup>th</sup> Street SE

360-668-1872

[mjohnson@crossvalleywater.net](mailto:mjohnson@crossvalleywater.net)