



## LAKE WHATCOM WATER & SEWER DISTRICT

1220 Lakeway Drive  
Bellingham, WA, 98229

(360) 734-9224  
Fax 738-8250

# MEMORANDUM

Date: July 2, 2020  
From: Lake Whatcom Water & Sewer District  
RE: Meeting Procedures During the Covid-19 Emergency

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Lake Whatcom Water & Sewer District continues to operate under adjusted procedures in order to provide continuous service to our customers. That said, we are taking precautions in an effort to protect the health and safety of our staff, commissioners, and customers. Our lobby is currently closed to the public, and we are practicing social distancing guidelines as suggested by Governor Inslee and the CDC.

For the foreseeable future, Commissioners will be attending regular meetings by phone. Per Governor Inslee's [Proclamation No. 20-28.3](#) amending his Stay Home, Stay Health proclamation, the District will provide access to interested public via phone/internet utilizing the GoToMeeting platform.

If you would like to attend the July 08 special work session and/or regular meeting, details can be found below. In this evolving climate, we are committed to doing everything possible to provide opportunity for public comment as well as promote health and safety. As such, the District requests that if possible, public submit comments in written form by noon the day before a scheduled meeting for inclusion in the meeting discussion.

We appreciate your understanding and patience during these uncertain times. If you have any questions, please contact Administrative Assistant Rachael Hope at [rachael.hope@lwwsd.org](mailto:rachael.hope@lwwsd.org) or 360-734-9224.

### **7.08.20 Special Work Session and Regular Board Meeting**

Work Session (5:30 – 6:30 pm)  
Board Meeting (6:30 pm)

**Please join my meeting from your computer, tablet or smartphone.**

<https://global.gotomeeting.com/join/368180581>

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LAKE WHATCOM WATER AND SEWER DISTRICT

1220 Lakeway Drive  
Bellingham, WA 98229

WORK SESSION OF THE BOARD OF COMMISSIONERS

**AGENDA**

*July 8, 2020*

5:30 p.m. – Work Session

1. CALL TO ORDER
2. SPECIFIC ITEMS OF WORK
  - A. On-site Sewage Disposal System-to-Sewer Conversion Program Policy
3. ADJOURNMENT



## LAKE WHATCOM WATER & SEWER DISTRICT

1220 Lakeway Drive  
Bellingham, WA, 98229

(360) 734-9224  
Fax 738-8250

# MEMORANDUM

To: Board of Commissioners Date: April 7, 2020  
From: Justin Clary, General Manager  
RE: On-site Sewage Disposal System-to-Sewer Conversion Program Policy Analysis

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The Lake Whatcom Water and Sewer District (District) was founded in 1968 to facilitate the conversion to public sewer of on-site sewage disposal systems (OSDS or septic systems) serving county residents within the Lake Whatcom watershed. A fundamental reason for connecting residents to a public sewage system was to address deteriorating water quality in the lake attributed to failing OSDs. The District's mission remains aligned with its founding purpose ("*...in a way that contributes to protecting Lake Whatcom's water quality*"). Section 5.1.3 of the District's Administrative Code defines District requirements specific to abandonment of existing OSDs and connection to the District's sewage system:

### **5.1.3 Sewer Connections Required**

*When the public sewer collector and transmission lines have sufficient capacity, all property within the District boundaries shall be deemed capable of being served by a public sewer when such property has a sewer collector line located within 200 feet of the property and it is inside a UGA or LAMIRD, or within 150 feet elsewhere, and on an abutting alley, street, easement, or right of way. Appropriate connection and other charges shall be required.*

*The owner of each lot or parcel located within the District's boundaries, upon which lot or parcel there is situated any building or structure with interior plumbing fixtures that discharge liquid waste or liquid-borne solid waste, and said lot or parcel is capable of being served by the District's public sewer in accordance with this section, shall install suitable toilet facilities therein and shall connect such facilities, together with all other facilities in use therein which results in the existence of sewage, to the public sewer system, at his/her own expense. [Resolution Nos. 785, 834]*

*A lot or parcel that has been developed with on-site sewage disposal system (OSSDS) is required to abandon OSSDS systems and connect to the District sewer within 60 months after a District public sewer collector or transmission line adjoins the property in a public right-of-way or easement benefitting the District, and within eighteen months after the date of mailing or personal service of written notice to the lot or parcel owner that a public sewer collector or transmission line has sufficient capacity and is available for such lot or parcel. The District shall compel such connection under the provisions of [RCW 57.08.005](#) should*

*the property owner refuse to connect within eighteen months after the date of mailing or personal service of such written notice.*

*If a lot or parcel is capable of being served by the District's public sewer in accordance with this section and if a Health Officer finds that an existing onsite septic system has failed, that parcel must connect to the District sewer immediately. [Resolution Nos. 146, 683, 732, 785, 828, 846]*

Historically, as OSDSs within the defined proximity to District sewer mains are identified, the District requires abandonment and connection to District sewer. The owners of one such OSDS noticed for connection to District sewer in February 2019 presented a proposal to the District Board of Commissioners (Board) in November 2019 for creation of a program to financially assist future OSDS-served properties in connecting to District sewer. While the Board elected not to create such a program, it did indicate that it wishes to conduct a holistic review of the District's OSDS conversion policy. The purpose of this memorandum is to summarize the current policy and its history, to identify exceptions to or nuances of the current policy through evaluation of each known OSDS within relative proximity to District sewer, and to facilitate Board discussion regarding potential policy revisions.

#### Current Policy

District Administrative Code Section 5.1.3 (cited above) provides current District policy pertaining to conversion of OSDS-served properties to District sewer. In addition, District Administrative Code Sections 3.4.2.1 and 3.4.3.1 provide further clarification specific to connection to District sewers for residential and non-residential development, respectively. Regardless of development type, connection requirements to District sewers vary depending on whether or not the subject development is located within or outside of a Whatcom County-adopted *urban growth area* (UGA) or *limited area of more intense rural development* (LAMIRD). Within the District's boundaries are the city of Bellingham's Geneva UGA and the Sudden Valley LAMIRD.

#### Inside UGA or LAMIRD:

- Residential Development. District sewer adjacent to or within 200-feet of property—connection required.
- Residential Development. District sewer greater than 200-feet from property—District may extend sewer to within 200-feet of property and require connection.
- Non-residential Development. Connection required, regardless of distance to District sewer.

#### Outside UGA or LAMIRD:

- All Development. District sewer within 150-feet of property—connection required.
- All Development. District sewer greater than 150-feet from property—development may be served by OSDS, subject to recording a covenant binding the property to future water/sewer service (condition of new development).

### Policy History

As stated above, the District was originally founded based on protecting Lake Whatcom water quality through the conversion of OSDs to connection to the District's public sewer system that conveys sewage out of the watershed for treatment. Since its founding, the District has through adoption of resolutions and/or administrative code amendments, refined its sewer connection policy.

- Resolution No. 146 (1974). Required improved property to connect to public sewer if within 200 feet of property line and sufficient capacity existed, within 12 months of notice.
- Resolution No. 171 (1976). Amended connection requirements to 300 feet.
- Resolution No. 495 (1989). Cited Revised Code of Washington (RCW) in providing the District authority to compel connection to District sewer for any unconnected property within a District utility local improvement district (ULID).
- Resolution No. 683 (2001). During a sewer connection moratorium (1992-2003), the District adopted this resolution requiring improved properties within the sewer connection moratorium area to connect to District sewer within 60 months from the time of District notification that capacity was available.
- 2005 Notice. District sent notice to ULID No. 18 property owners reminding to them to connect to District sewer, with a deadline for connection of January 30, 2008.
- Resolution No. 732 (2007). Added that for property owners that fail to connect within 60 months of sewer mains with sufficient capacity becoming available within 200 feet of property or within 12 months of receiving notice to connect, that property would be subject to sewer charges. The District began collecting sewer service charges on applicable properties within ULID No. 18 on February 1, 2008, regardless of whether or not they were connected to District sewer.
- Resolution No. 785 (2011). Refined connection requirements to within 200 feet of the property line if inside UGA or LAMIRD, or 150 feet of property line elsewhere. The resolution also amended Administrative Code Section 5.1.3 to compel connection if the owner refuses to connect, consistent with Resolution No. 495 (1989).
- Resolution No. 828 (2016). Revised Administrative Code Section 5.1.3 to define connection timeline of 12 months from time of notice, consistent with Resolution Nos. 146 and 732. The resolution also referenced 11 unconnected properties located within ULID No. 18 meeting proximity requirements that had not connected, and reaffirmed the District's requirement to connect.
- Resolution No. 846 (2018). Revised connection requirements from 12 to 18 months from receipt of notice to connect for applicable properties.

### Recent District Actions Requiring Connection

The 11 unconnected OSDS-served properties cited in Resolution No. 828 have since connected to District sewer with the final three properties connected by the District at the owners' expense in 2018 (costs of each of those connections ranged from approximately \$25,000 to \$50,000).

In February 2019, the District provided notice to three additional OSDS-served properties that were identified as meeting the connection requirements. One of those properties has since connected (through order of the Whatcom County Health Department). At its December 11, 2019 meeting, the Board extended the requirement to connect for the remaining two properties by 12 months to allow time to holistically reconsider the OSDS-to-sewer conversion policy.

### Land Use Considerations

Following are state- and District-adopted land use policies/actions that have implications relative to the District's OSDS conversion policy:

- Washington State Growth Management Act (GMA)  
The GMA is a series of state statutes, first adopted in 1990, that guides qualifying counties (of which Whatcom County is one) and their urban areas in the management of growth through comprehensive plan development and implementation. Codified under [Chapter 36.70A RCW](#), the GMA establishes a series of 13 goals and policies that form the basis of all county-wide planning policies, comprehensive land use plans, and development regulations. A key element of the GMA applicable to the District is utilities. The GMA provides that, “[i]n general, it is not appropriate that urban governmental services be extended to or expanded in rural areas except in those limited circumstances shown to be necessary to protect basic public health and safety and the environment and when such services are financially supportable at rural densities and do not permit urban development.” [RCW 36.70A.110\(4\)](#). “Urban governmental services” include sewer service. [RCW 36.70A.030\(24\)](#). This means that the District may provide sewer service to properties located within a UGA or LAMIRD, which are areas of urban development, but is constrained in its ability to provide sewer service outside of a UGA or LAMIRD. Of note specific to the OSDS conversion policy, the District may not extend publicly-owned sewer service to serve existing and/or future development located outside of a UGA or LAMIRD, unless it is determined to be “necessary to protect basic public health and safety and the environment,” is financially supportable at rural densities, and will not lead to urban-style growth in the rural area. This statute ([RCW 36.70A.110\(4\)](#)) was affirmed under the 2002 *Thurston County v. Cooper Point Association, et. al.* Washington State Supreme Court decision. Whatcom County also requires a conditional use permit to make use of this exception. [WCC 20.82.030\(4\)](#). The GMA does not prevent the District from providing sewer service to rural properties that were already connected to its sewers when the GMA was enacted.
- Interpretation of Sewer Line Extension Definition  
Under [RCW 90.48.110](#), the Washington State Department of Ecology (Ecology) must approve sewer comprehensive plans. The review includes review of GMA compliance; Ecology may not approve a sewer comprehensive plan that it determines violates the

GMA. [Chapter 173-240 of the Washington Administrative Code](#) (WAC) specifies how Ecology will review sewer comprehensive plans. [Section 173-240-020\(13\)](#) defines a “sewer line extension” as “any pipe added or connected to an existing sewerage system, together with any pump stations: Provided, That the term does not include gravity side sewers that connect individual building or dwelling units to the sewer system when these side sewers are less than one hundred fifty feet in length and not over six inches in diameter.” As extension of public sewers outside of UGAs and LAMIRDs is generally not permitted under the GMA (unless allowed for reasons cited in the preceding bullet), this WAC has implications specific to requiring connection of properties outside of the Geneva UGA or Sudden Valley LAMIRD. Ecology’s interpretation of the GMA under this WAC is that any pressure (e.g., grinder pump-served) system connecting to District sewer outside of a UGA/LAMIRD is a *sewer line extension* that is not allowed under GMA. For gravity connections, under the WAC, regardless of the distance between sewer main and property line, if the distance between the property line and the *structure* to be served is greater than 150 feet (i.e., side sewer length), then it is considered a *sewer line extension* that is not allowed under GMA. The District administrative code requirement for connection of any *properties* within a specific distance to a sewer main, without regard to whether it is a pressure line or its length, is not consistent with a combined reading of the GMA and this WAC.

- **ULID No. 18**  
In 2001, the District formed a utility local improvement district (ULID No. 18) to finance the Lake Louise Road Interceptor project (95% of the project cost was assessed against benefiting properties: vacant parcels and developed parcels with existing OSDSs). Owners of undeveloped properties had the option to “opt out” of inclusion in the ULID, subject to filing a restrictive covenant against the property that prohibited development for 25 years (the restrictive covenants expire December 31, 2027). A total of 50 properties are subject to the restrictive covenant that may develop following covenant expiration. While these properties are not relevant to the OSDS conversion policy, there may be implications on connection to District sewer once the covenant sunsets. On the other hand, owners of OSDS-served properties within the ULID were required to connect to District sewer. As stated earlier, all known OSDS-served properties located in ULID No. 18 have since connected to District sewer (with exception to the two properties noticed in February 2019).
- **ULID No. 18 Abutting Properties**  
Creation of a ULID through the Resolution of Intention method (method used in the creation of ULID No. 18) allows for a 30-day protest period, where if the protest level is 40% or greater of the benefiting properties (percentage is based upon acreage), the public agency is divested from forming the ULID. To ensure creation of ULID No. 18, blocks of larger parcels abutting the planned interceptor (e.g., certain parcels along Lake Louise Road) were excluded from the ULID. As a result, there are existing OSDS-served properties that may meet the District’s connection proximity criteria that have not been required to connect. These connections would be pressure connections and therefore are considered *sewer line extensions* not allowed under the GMA.

### Connection Feasibility Considerations

In considering revisions to the OSDS conversion policy, there are other factors that the Board may wish to consider, along with how those factors may be applied on a case by case basis, and the degree of flexibility that may be afforded.

- **Environmental Constraints** (critical areas, e.g., wetlands, streams, geologically hazardous areas). Under strict interpretation of the current policy, all OSDS-served properties are required to connect to District sewer if they meet the proximity (distance from sewer main to property line) requirement. However, other land use regulations may render actual construction of a connection infeasible. For example, a property may be directly adjacent to a sewer main; however, a stream, wetland, or geologically hazardous area (typically steep slope) may be located on the property that separates the OSDS-served structure from the main. Under current land use regulations, permitting and construction of a side sewer through the wetland or on a steep slope may not be allowed. Therefore, the Board may wish to specifically define the District's policy for requiring connections when environmental constraints are present.
- **Legal Constraints.** It is possible that an OSDS-served property meeting the proximity requirement may be landlocked by an easement through which the OSDS-served property owner does not have authorization to extend a side sewer through. For such a scenario, the current policy makes no accommodation other than to force acquisition to use the easement to secure a constructible alignment. And there is no guarantee that the easement owner will grant extension of a side sewer through the easement. Notwithstanding the foregoing, it is likely under such a scenario that the side sewer length would exceed 150 feet in length, thus making it a *sewer line extension* that is not allowed under GMA.

### Financial Relief Program Considerations

During consideration of the proposal regarding creation of an assistance program during its December 11, 2019 meeting, the Board recognized the significant cost of self-financing the abandonment of an existing OSDS and connecting to District sewer, and indicated an interest in exploring the creation of a program that provides some level of relief for future OSDS-required connections. To facilitate the Board's discussion, following are considerations for creating a financial relief program:

- **Funding Source**  
Although the program would be related to connection of properties to the District's sewer system, the public benefit nexus for facilitating the connection could be protection of the District's drinking water source (Lake Whatcom). Therefore, a financial relief program could require funding by the District's water utility (similar to the District's funding of the Lake Whatcom Management Program tributary monitoring program and aquatic invasive species program). In addition, the connection of the property to public sewer could also be viewed as a benefit to the sewer utility (e.g., additional sewer utility fees would enhance the predictability of revenue streams and better allow for system maintenance, and spread the cost of operating the utility over a larger customer base). As a result, the Board could set policy that the water and/or sewer utility revenues are appropriate to



fund a financial relief program. Regardless, future rate studies would need to accommodate the program costs in development of water and/or sewer utility rates.

- Financial Relief Options
  - General Facility Charge (GFC) Waiver. The District charges a GFC, which is developed to cover the equitable share of the cost of the existing system to which a property connects, as well as future system improvements (the 2020 sewer GFC for a single-family residence is \$8,117) required based upon the connection. Other public agencies, including the city of Lynden, provide a GFC waiver for connection of OSDS-served properties to the city's sewer system, if completed within two years of receiving notice from the city.
  - Construction Cost Relief. The proposal presented to the Board in November 2019 by the affected property owner for creation of a financial relief program contained two options: 1) the District equally reimburse all required connections in that calendar year the total budgeted to the program (proposed at \$50,000); or 2) the District reimburse up to 50% of the connection costs for each compelled connection up to that calendar year's total program budget (proposed at \$50,000). Another option could be to set a flat rate (e.g., \$10,000) that would be reimbursed per required connection, regardless of actual construction costs.
- Past Compelled Connections

Historically, and as recently as January, the District has required connections to bear the full cost of connection to the District's sewer system (design, permitting, GFC and other fees, and construction costs). As indicated earlier, these are significant costs. While the District has the legal authority to create a financial relief program, it could not retroactively reimburse those that were required to connect prior the policy revision because this would be a gift of public funds. This could put the District at some risk of legal challenges from unreimbursed property owners previously required to connect (one that District legal counsel is confident could be successfully defended), but that could create financial and administrative obligations if a challenge was filed.
- Future Compelled Connections

While recent history reflects a relatively minor number of required connections per year (e.g., up to three per year), if the Board wishes to create a financial relief program, it should consider potential budgetary impacts if a large number of properties were required to connect in a given year (e.g., if a sewer line was constructed along the north shore of Lake Whatcom). Under such a scenario, if a budgetary cap was in place, either a relatively small percentage of the overall connections may receive financial relief (such as under a first come-first served basis), or else the financial relief may be a lesser amount distributed over a larger potential group. On the other hand, if there is no budgetary cap, the District could be faced with significant costs to fully administer the financial relief program.

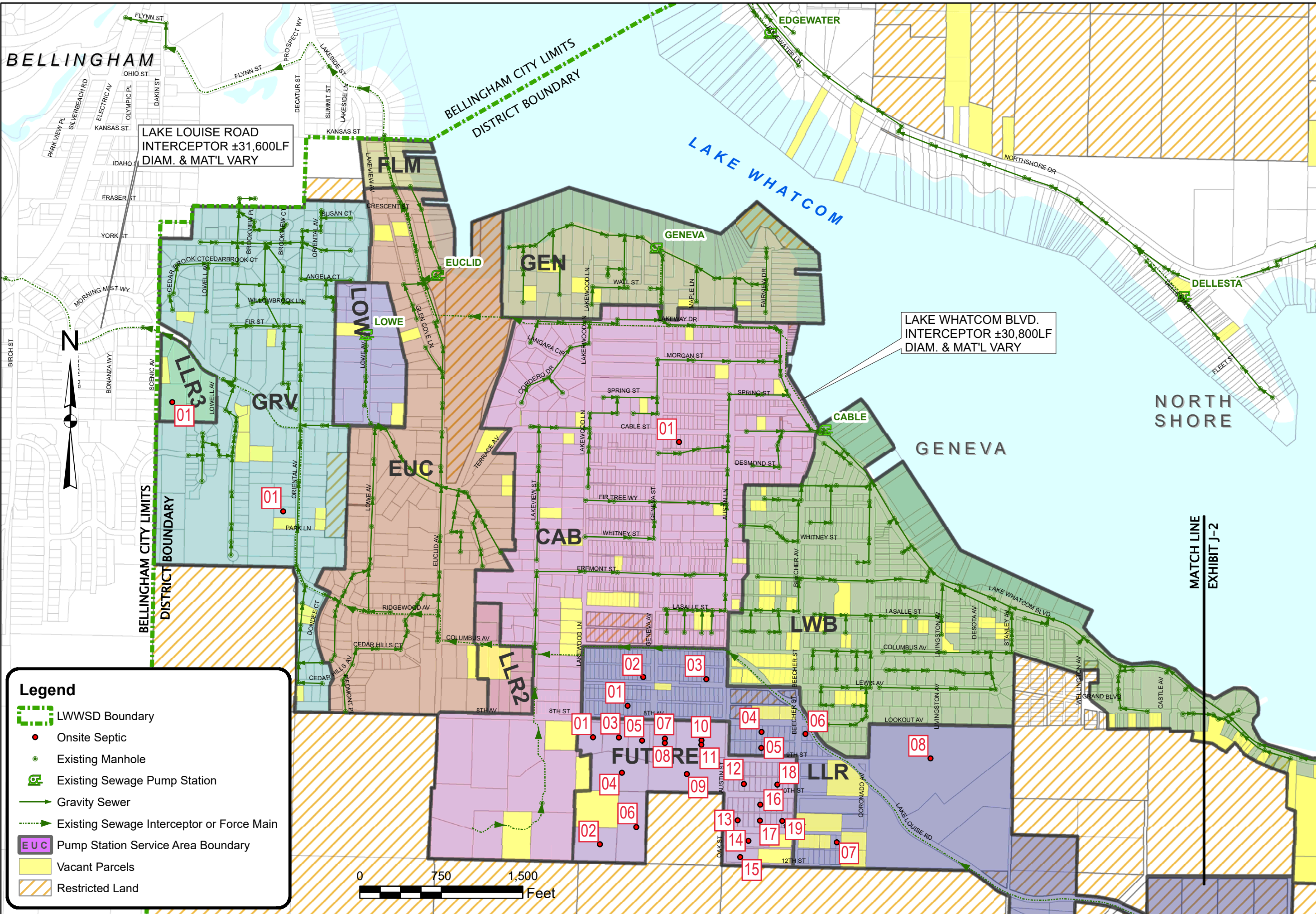
#### Analysis of Specific OSDS-served Properties

While any revisions to the OSDS conversion policy should be holistic in considering present day implications as well as potential future scenarios, the relatively few existing OSDSs within the

District's Sewer Comprehensive Plan-defined current and future service areas allows for an analysis of each OSDS relative to current District policy. Attached is a set of four figures depicting the District's potential sewer growth map. Within the figures are known OSDSs, which have been assigned specific identifying numbers relative to each sewer pump station service area. The attached table then evaluates each OSDS relative to current state and District connection requirements/allowances. As can be seen, aside from the two outstanding OSDSs that received notice to connect in February 2019 (identified as GRV-01 and CAB-01), there is only one other OSDS-served property (AGB-06) that *may* meet state and District connection requirements—District staff are confirming that distance requirements specific to the property and the structure meet the requirements for connection; once confirmed, the District will proceed with noticing the property owner of the need to connect.

#### Staff Recommendation

With the remaining number of OSDS-served properties that the District could legally compel to connect being limited to three (two of which have already received notice to connect), to maintain consistency with past District action and to mitigate any further impacts to District resources through further policy analysis, staff recommends that the District not consider any revisions to its current OSDS conversion policy.



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CIVIL STRUCTURAL SURVEY

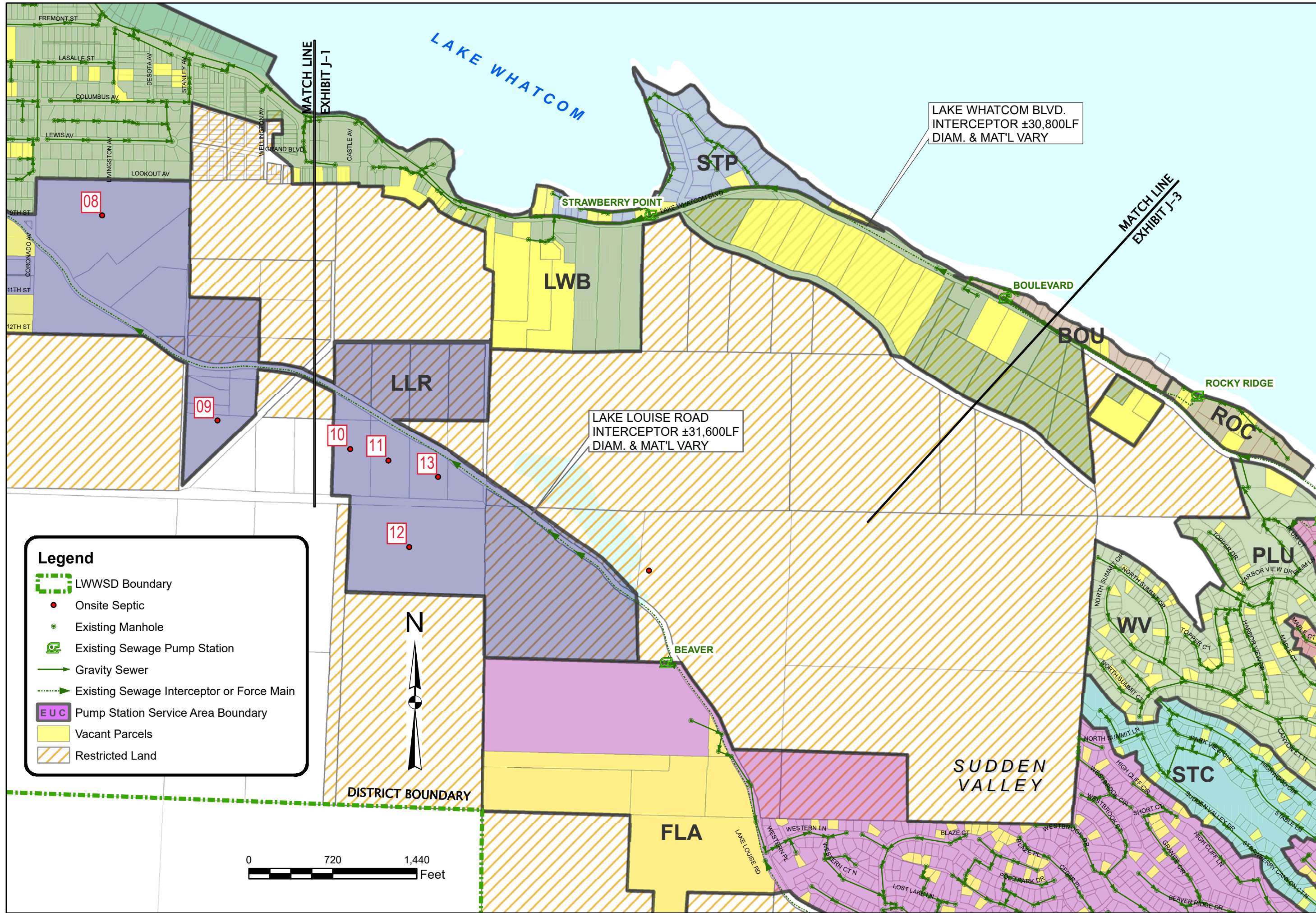
DESIGNED BY	MMM
DRAWN BY	JMR
CHECKED BY	MMM

LAKE WHATCOM WATER & SEWER DISTRICT  
WASHINGTON  
BELLINGHAM

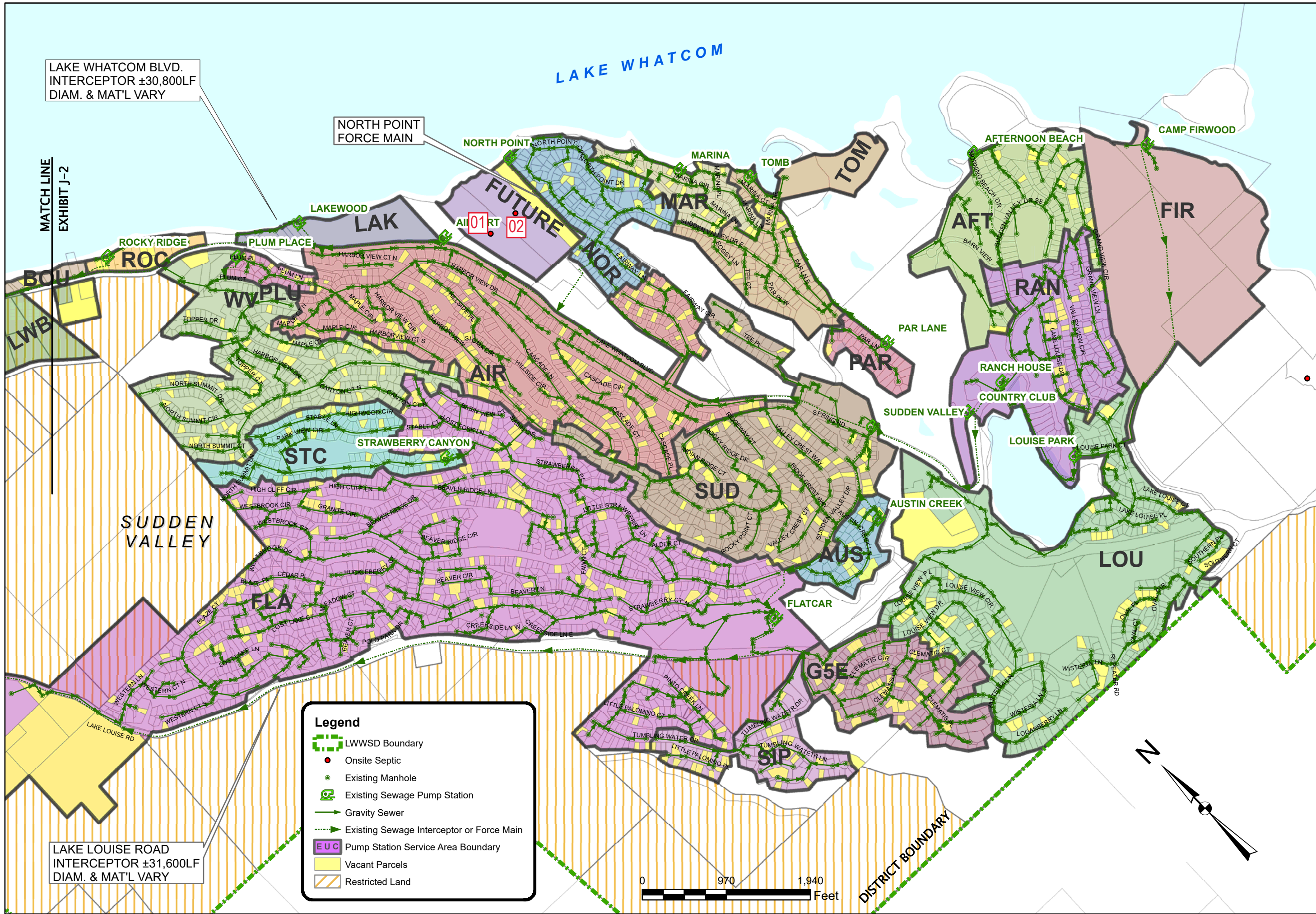
EXHIBIT J-1  
SUDDEN VALLEY - GENEVA  
POTENTIAL SEWER GROWTH MAP

DATE	NOV. 2019
SCALE	AS SHOWN
PROJECT	2019-077

SHEET 1 OF 4



 WILSON ENGINEERING <small>WILSONENGINEERING.COM</small>	
CIVIL STRUCTURAL SURVEY	
DESIGNED BY MMM	DRAWN BY JMR
LAKE WHATCOM WATER & SEWER DISTRICT EXHIBIT J-2 SIDDEN VALLEY - GENEVA POTENTIAL SEWER GROWTH MAP	
DATE NOV. 2019	SCALE AS SHOWN
SHEET <b>2</b>	OF <b>4</b>
PROJECT 2019-077	



LAKE WHATCOM BLVD.  
INTERCEPTOR ±30,800LF  
DIAM. & MAT'L VARY

NORTH POINT  
FORCE MAIN

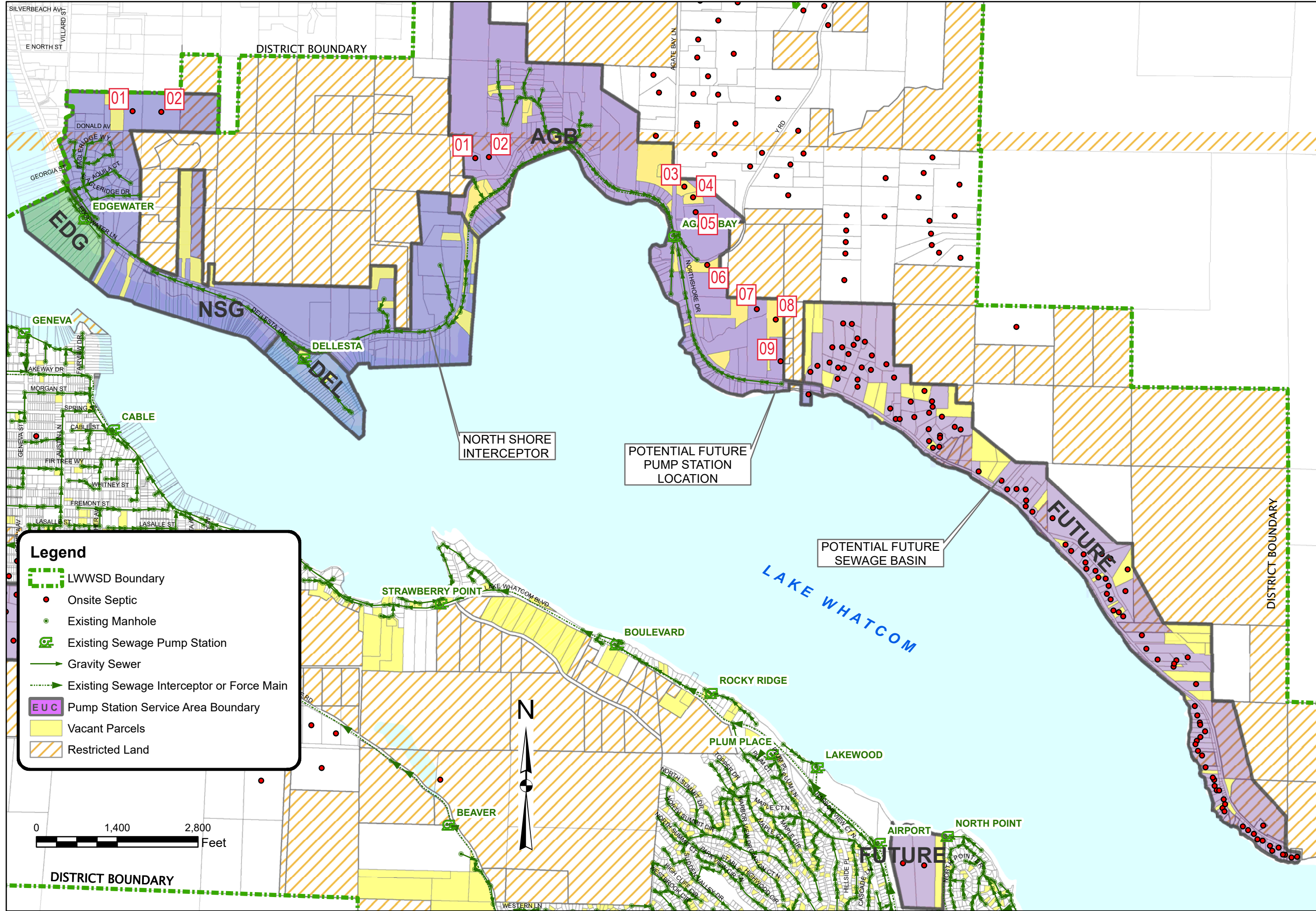
MATCH LINE  
EXHIBIT J-2

LAKE LOUISE ROAD  
INTERCEPTOR ±31,600LF  
DIAM. & MAT'L VARY

**Legend**

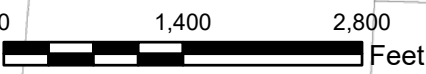
- LWWSD Boundary
- Onsite Septic
- Existing Manhole
- Existing Sewage Pump Station
- Gravity Sewer
- Existing Sewage Interceptor or Force Main
- Pump Station Service Area Boundary
- Vacant Parcels
- Restricted Land

 <b>WILSON</b> ENGINEERING WILSONENGINEERING.COM		CIVIL STRUCTURAL SURVEY
		DESIGNED BY MMM DRAWN BY JMR CHECKED BY MMM
<b>LAKE WHATCOM WATER &amp; SEWER DISTRICT</b> BELLINGHAM WASHINGTON <b>EXHIBIT J-3</b> <b>SUDDEN VALLEY - GENEVA</b> <b>POTENTIAL SEWER GROWTH MAP</b>		
DATE NOV. 2019	SCALE AS SHOWN	PROJECT 2019-077
SHEET <b>3</b>	OF <b>4</b>	



**Legend**

- LWWSD Boundary
- Onsite Septic
- Existing Manhole
- Existing Sewage Pump Station
- Gravity Sewer
- Existing Sewage Interceptor or Force Main
- Pump Station Service Area Boundary
- Vacant Parcels
- Restricted Land



<b>CIVIL STRUCTURAL SURVEY</b>	
<b>WILSON ENGINEERING</b> WILSONENGINEERING.COM	
DESIGNED BY MMM	DRAWN BY JMR
LAKE WHATCOM WATER & SEWER DISTRICT EXHIBIT J-4 NORTH SHORE POTENTIAL SEWER GROWTH MAP	
DATE NOV. 2019	SCALE AS SHOWN
SHEET <b>4</b>	PROJECT 2019-077
CHECKED BY MMM	

**On-site Sewage System-to-Sewer System Connection Analysis**  
**Lake Whatcom Water and Sewer District**

ID No.	Parcel No.	Abuts Sewer Main <sup>1</sup>	UGA/ LAMIRD <sup>2</sup>	Sewer <200' from property line <sup>1</sup>	Sewer <150' from property line <sup>1</sup>	Sewer Type <sup>3</sup>	Structure <150' from property line <sup>3</sup>
LLR3-01	380327-013010-0000	No	Yes	-	NA	NA	NA
GRV-01	380334-120485-0000	Yes	Yes	Yes (noticed 02.2019)	NA	NA	NA
CAB-01	380334-514558-0000	Yes	Yes	Yes (noticed 02.2019)	NA	NA	NA
GV-FUTURE-01	380334-409248-0000	No	No	NA	-	-	-
GV-FUTURE-02	380334-417149-0000	No	No	NA	-	-	-
GV-FUTURE-03	380334-432249-0000	No	No	NA	-	-	-
GV-FUTURE-04	380334-437216-0000	No	No	NA	-	-	-
GV-FUTURE-05	380334-453246-0000	No	No	NA	-	-	-
GV-FUTURE-06	380334-450166-0000	No	No	NA	-	-	-
GV-FUTURE-07	380334-455250-0000	No	No	NA	-	-	-
GV-FUTURE-08		No	No	NA	-	-	-
GV-FUTURE-09	380334-494211-0000	No	No	NA	-	-	-
GV-FUTURE-10	380334-510250-0000	No	No	NA	-	-	-
GV-FUTURE-11		No	No	NA	-	-	-
GV-FUTURE-12	380335-019213-0000	No	No	NA	-	-	-
GV-FUTURE-13	380335-013172-0000	No	No	NA	-	-	-
GV-FUTURE-14	380335-024154-0000	No	No	NA	-	-	-
GV-FUTURE-15	380335-020138-0000	No	No	NA	-	-	-
GV-FUTURE-16	380335-034186-0000	Yes	No	NA	Yes	Pressure	-
GV-FUTURE-17	380335-034172-0000	No	No	NA	-	-	-
GV-FUTURE-18	380335-048213-0000	Yes	No	NA	Yes	Pressure	-
GV-FUTURE-19	380335-056172-0000	Yes	No	NA	Yes	Pressure	-
LLR-01	380334-477316-0000	No	No	NA	-	-	-
LLR-02	380334-495334-0000	Yes	No	NA	Yes	Pressure	-
LLR-03	380334-543334-0000	Yes	No	NA	Yes	Pressure	-
LLR-04	380335-034253-0000	Yes	No	NA	Yes	Pressure	-
LLR-05	380335-034239-0000	No	No	NA	-	-	-

**On-site Sewage System-to-Sewer System Connection Analysis**  
**Lake Whatcom Water and Sewer District**

ID No.	Parcel No.	Abuts Sewer Main <sup>1</sup>	UGA/ LAMIRD <sup>2</sup>	Sewer <200' from property line <sup>1</sup>	Sewer <150' from property line <sup>1</sup>	Sewer Type <sup>3</sup>	Structure <150' from property line <sup>3</sup>
LLR-06	380335-073253-0000	Yes	No	NA	Yes	Pressure	-
LLR-07	380335-105152-0000	Yes	No	NA	Yes	Pressure	-
LLR-08	380335-195230-0000	Yes	No	NA	Yes	Pressure	-
LLR-09	380335335078-0000	Yes	No	NA	Yes	Pressure	-
LLR-10	380335-449038-0000	Yes	No	NA	Yes	Pressure	-
LLR-11	380335-480038-0000	Yes	No	NA	Yes	Pressure	-
LLR-12	370302-455490-0000	No	No	NA	-	-	-
LLR-13	380335-530019-0000	Yes	No	NA	Yes	Pressure	-
SV-FUTURE-01	370406-476370-0000	No	Yes	-	NA	NA	NA
SV-FUTURE-02	370406-510365-0000	No	Yes	-	NA	NA	NA
NSG-01	380323-120030-0000	No	No	NA	-	-	-
NSG-02	380323-170030-0000	No	No	NA	-	-	-
AGB-01	380325-161523-0000	No	No	NA	-	-	-
AGB-02	380325-194519-0000	No	No	NA	-	-	-
AGB-03	380430-017437-0000	No	No	NA	-	-	-
AGB-04	380430-032418-0000	No	No	NA	-	-	-
AGB-05	380430-106444-0000	No	No	NA	-	-	-
AGB-06	380430-062306-0000	Yes	No	NA	Yes	Gravity	Yes (confirming distances)
AGB-07	380430-153248-0000	No	No	NA	-	-	-
AGB-08	380430-176233-0000	No	No	NA	-	-	-
AGB-09	380430-178167-0000	Yes	No	NA	Yes	Gravity	Yes (connected 11.2017)
NS-FUTURE	97 OSDSS-none abut existing sewer		No	NA	-	-	-

<sup>1</sup> District Administrative Code Section 5.1.3

<sup>2</sup> State Growth Management Act (36.70A Revised Code of Washington)

<sup>3</sup> Washington Administrative Code Section 173-240-020(13)