



State of Washington  
**DEPARTMENT OF HEALTH**

NORTHWEST DRINKING WATER REGIONAL OPERATIONS  
20425 72nd Avenue South, Suite 310 • Kent Washington 98032-2388

December 22, 2020

DAVE OLSON  
WHATCOM COUNTY WATER DIST NO 7  
PO BOX 28700  
BELLINGHAM WA 98228

RE: Whatcom County Water Dist. No 7 ID# 95900  
Whatcom County  
Water System Plan  
Submittal #20-0906

Dear Mr. Olson:

Thank you for submitting the Water System Plan (WSP) for the Whatcom County Water District #7 (the District) received in this office on September 28, 2020. We have reviewed the plan and offer the following comments. These comments must be adequately addressed prior to approval of the WSP.

**Description of Water System**

Provide Statements of Local Government Consistency from the City of Bellingham and from Whatcom County Planning.

**System Analysis**

What is your rationale for using the system's "MDD with conservation" (403 GPD/ERU) to calculate source capacity and tank capacity? This is riskier than using your MDD without conservation (411 GPD/ERU). We don't recommend including expected future water use efficiency savings in water demand projections. How does your analysis compare to using the MDD without conservation? Does the system still have the capacity to meet the system's expected 20-year demand?

**Operations & Maintenance**

We recommend having a sample site in each pressure zone for easier bacteriological troubleshooting and good representation of the distribution system. Please provide your rationale for grouping pressure zones 6-10 into other pressure zones and why you believe four sample stations properly represent the distribution system (Coliform Management Program, Appendix E). Alternatively, address this smaller number of sample sites in your CIP and budget.

In the standard specification (p. 62), I did not see a bacteriological test requirement, in addition to pressure testing, flushing, and disinfection, prior to bringing distribution and transmission mains online. Please add bacteriological testing requirement to protect the distribution from bacterial contamination during the construction process.



**Documentation**

The water system must meet the consumer input process outlined in WAC 246-290-100(8). Please include documentation of a consumer meeting discussing the WSP, prior to DOH approval of the WSP.

Prior to DOH approval, the District's governing body must approve and adopt the WSP.

A signed SEPA Checklist and DNS was included with the draft WSP.

Include any comments from adjacent purveyors and the District's response to those comments.

We hope that you have found these comments to be clear, constructive and helpful in the development of your final draft WSP. We ask that you submit the revised WSP on or before March 30, 2021. In order to expedite the review of your revised submittal, please include a cover letter summarizing how each of the above comments was addressed in the revised WSP and where each response is located (i.e., page numbers, Appendices, etc.)

Regulations establishing a schedule for fees for review of planning, engineering and construction documents have been adopted (WAC 246-290-990). Please note that we have included an invoice in the amount of **\$2280.00** for the review of the Water System Plan. This fee covers our cost for review of the initial submittal, plus the review of one revised document. Please remit your complete payment in the form of a check or money order within thirty days of the date of this letter to: **DOH, Revenue Section, and P.O. Box 1099, Olympia, WA 98507-1099.**

Thank you again for submitting your draft Water System Plan for our review. If you have any comments or questions concerning our review, please contact either of us.

Sincerely,



Richard Rodriguez  
Regional Planner  
(253) 395-6771



Laura McLaughlin, PE  
Regional Engineer  
(253) 395-6761

Enclosure (invoice)

cc:

Darin Klein, Whatcom Co. Health  
Matt Aamot, Whatcom Co. Planning & Development Services  
Carl Reichhardt, P.E., Reichhardt & Ebe Engineering, Inc.