



TECHNICAL MEMORANDUM

TO: WHATCOM COUNTY WATER DISTRICT 13
FROM: ROGER KUYKENDALL, P.E.
DATE: JANUARY 26, 2026
SUBJECT: NEW SEWER GENERAL FACILITIES
CHARGE
WHATCOM COUNTY WATER
DISTRICT 13, WASHINGTON
G&O #25415.00

This technical memorandum provides the results of the calculation of the General Facility Charge (GFC) for the sewer utility. Future capital information originates from the *2011 Wastewater Treatment Plant Engineering Report*, and the *2012 Comprehensive Sewer Plan*, as modified by new information acquired during the preparation of the *2026 General Sewer Plan/Engineering Report*, and as noted in the attached tables. In accordance with RCW 57.08.005, a Right-to-Connect or “General Facilities Charge” may be charged to a property owner seeking to connect to the system in order that those property owners bear their equitable share of the cost of the system. A GFC includes a pro rata share of the cost of existing facilities (existing facility component) and facilities planned for construction within the next 10 years and contained in an adopted comprehensive plan (future facilities component), and other costs borne by the district which are directly attributable to the improvements required by property owners seeking to connect to the system. The cost of existing facilities cannot include portions of the system that were donated or paid for by grants. Also, the connection charge may include simple interest charges applied from the date of construction of the system until the connection or for a period not to exceed 10 years, whichever is shorter.

The existing facility component offsets the historical contributions from existing customers used to acquire existing assets of benefit to a new customer. The future facility component contributes toward capital improvement costs needed to serve future customers and is intended to minimize the impact to existing customers for the construction of facilities that may only be required due to growth. If new facilities are included in a 10-year capital improvement program (CIP) that replace existing facilities, the cost of the older facilities must be removed from the calculation. GFCs cannot be used to pay operating and maintenance costs.



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EXISTING FACILITY COMPONENT

Known original (1977) facility costs are provided in the attached Table 1. These costs are derived from the 1987 complaint filed in Whatcom County Superior Court regarding a class action lawsuit against the Peaceful Valley developers and the District. The allowable accrued annual interest on the original assets is 8.5 percent, based upon the bond interest rate identified in the complaint. Total eligible GFC costs for the original facilities equal \$1,190,393.

Known new assets and facilities, added since 1977, are provided in the attached Table 2. The allowable accrued annual interest on the new assets is approximated at 5.0 percent, based upon current commercial interest rates. Total new asset eligible GFC costs are \$1,420,041.

FUTURE FACILITY COMPONENT

The 2012 Comprehensive Sewer Plan includes a CIP that identifies several different types of capital projects:

- Capacity Improvement – These projects are intended for the sole purpose of increasing existing system capacity to accommodate growth and are eligible for the GFC calculation.
- Regulatory – Money spent on activities or projects to meet regulatory requirements is an eligible cost.
- Repair and Replacement – These projects are not eligible for the GFC calculation unless they replace an existing facility with a facility that has an increased capacity. However, the existing facility must be removed from the existing facility cost basis.
- Growth-Related/Developer Extensions – These projects are for the sole purpose of providing sewage collection and conveyance for developing properties. They are typically funded entirely by developers, becoming donated facilities, and hence are not eligible for the GFC calculation.

Table 3 identifies the capital projects scheduled for completion over the next 10 years. The total eligible GFC costs are estimated at \$13,154,083.



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GFC CALCULATION

The pro rata share of the cost of the existing facilities is determined by dividing the calculated cost of existing facilities **that will benefit future customers** by the number of current customers. The current number of sewer customers (residential customer equivalent – RCE) is 471.

The pro rata share of the cost of the future facilities is determined by dividing the calculated cost of future facilities **that are required to serve growth** by the number of customers that component is expected to serve (existing and future customers). Planning data is taken from the *Draft 2026 General Sewer Plan/Engineering Report*. With the exception of the new WWTP, all of the eligible projects in the 10-year CIP are considered to serve growth for the number of RCEs anticipated in the tenth year (2035). Therefore, the GFC calculation will look ahead 10 years and use the 2035 RCE projection (692) as the number of anticipated RCEs at the end of the current 10-year period. The new WWTP is designed to serve up to 1,200 RCEs, and this will be the number of RCEs used to distribute equitable cost for the new WWTP.

Table 4 provides a breakdown of the GFC calculation for the existing and future components. The resulting GFC is calculated as \$5,542 (existing component) plus \$11,050 (future component) for a total GFC of \$16,592.

RECOMMENDATION

We recommend the District consider for adoption a GFC at or below the GFC calculated and presented Table 4. We also recommend that the calculation be reviewed by the District's Attorney.

Table 1
Original Sewer Facilities
Whatcom County Water District 13

Original Facilities	Initial 1977 Cost (1)	Year Completed	Allowable Interest (2)	Total Existing Cost Basis	Facility to Benefit New Customers?	Eligible Existing Cost Basis (3)
Division 1 Collection System	\$ 143,480	1977	\$ 121,958	\$ 265,439	Yes	\$ 265,439
Division 1 Engineering, Financing, Admin	\$ 44,173	1977	\$ 37,547	\$ 81,720	Yes	\$ 81,720
Extension No. 1 Collection System from Div #1 to WWTP	\$ 44,100	1977	\$ 37,485	\$ 81,585	Yes	\$ 81,585
Wastewater Treatment Plant (WWTP) (4) (5)	\$ 308,213	1977	\$ 261,981	\$ 570,194	No	0
Effluent Disposal Drain Field	\$ 54,472	1977	\$ 46,301	\$ 100,773	Yes	\$ 100,773
Effluent Force Main	\$ 10,668	1977	\$ 9,068	\$ 19,736	Yes	\$ 19,736
Sewer Trunk Lines	\$ 81,677	1977	\$ 69,425	\$ 151,102	Yes	\$ 151,102
Comp Plan, Engineering, Financing, Admin	\$ 264,886	1977	\$ 225,153	\$ 490,039	Yes	\$ 490,039
Total for Original Facilities	\$ 951,669			\$ 1,760,587		\$ 1,190,393

NOTES:

(1) Initial costs based upon 1987 Whatcom County Superior Court complaint.

(2) Allowable interest based upon 8.5% bond interest stated in Superior Court complaint.

(3) Eligible costs are based upon existing facilities that will benefit future development.

(4) There are some minor WWTP costs that benefit future development (i.e., land, control building, etc.), but these costs have not been determined or included.

(5) Existing WWTP will be replaced with new WWTP.

Table 2
New Sewer Assets
Whatcom County Water District 13

New Assets	Initial Cost (1)	Year Completed	Allowable Interest (2)	Total New Asset Cost Basis	Asset to Benefit New Customers?	Eligible New Asset Cost Basis (3)
Monitoring Well "D"	\$ 5,004	2008	\$ 2,502	\$ 7,505	Yes	\$ 7,505
WWTP Influent Flow Meter	\$ 31,398	2011	\$ 15,699	\$ 47,097	Yes	\$ 47,097
2011 WWTP Engineering Report	\$ 15,000	2011	N/A	\$ 15,000	Yes	\$ 15,000
2012 Sewer Comprehensive Plan	\$ 100,000	2012	N/A	\$ 100,000	Yes	\$ 100,000
Developer Extension Manual	\$ 2,500	2012	N/A	\$ 2,500	Yes	\$ 2,500
WWTP Influent Lift Station	\$ 133,073	2014	\$ 66,536	\$ 199,609	Yes	\$ 199,609
RPBA at WWTP & Green Valley Lift Station	\$ 19,116	2014	\$ 9,558	\$ 28,673	Yes	\$ 28,673
Effluent Pump Replacement (4)	\$ 26,660	2019	N/A	\$ 26,660	No	N/A
Green Valley Lift Station Pre-Design Report	\$ 27,300	2019	N/A	\$ 27,300	Yes	\$ 27,300
Lagoon #2 Liner Replacement (5) (6)	\$ 45,270	2020	N/A	\$ 45,270	No	N/A
WWTP Capacity Analysis	\$ 47,365	2022	N/A	\$ 47,365	Yes	\$ 47,365
WWTP Generator Replacement	\$ 87,550	2024	\$ 4,377	\$ 91,927	Yes	\$ 91,927
Updated O&M Manual	\$ 15,000	2024	N/A	\$ 15,000	Yes	\$ 15,000
4th Aerator at WWTP (6)	\$ 56,774	2025	\$ -	\$ 56,774	No	N/A
Lagoon Leak Detection Plan	\$ 16,500	2025	N/A	\$ 16,500	Yes	\$ 16,500
SWD Permit Appeal	\$ 136,536	2025	N/A	\$ 136,536	Yes	\$ 136,536
WWTP Critical Improvements	\$ 438,878	2025	\$ -	\$ 438,878	Yes	\$ 438,878
WWTP General Sewer Plan/ER	\$ 175,000	2025	N/A	\$ 175,000	Yes	\$ 175,000
WWTP AKART & Hydro Study	\$ 71,150	2025	N/A	\$ 71,150	Yes	\$ 71,150
Total New Assets Since 1977:	\$ 1,450,073			\$ 1,548,745		\$ 1,420,041

NOTES:

- (1) Initial costs based upon actual cost for planning, design, construction, and construction management.
- (2) Allowable interest assumed at 5.0% based upon current commercial interest rates. Not applicable to non-facility assets.
- (3) Eligible costs are based upon new assets & facilities that will benefit future development.
- (4) 2019 effluent pumps replaced in 2025.
- (5) Design was completed to 90%, work stopped due to COVID 19. Liner has not been replaced.
- (6) Item will be replaced with new WWTP.

Table 3
Sewer 10-Year Capital Improvement Projects
Whatcom County Water District 13

Project	2011 Estimated Cost (1)	Schedule (2)	2025 Estimated Cost (3)	To Serve Growth in next 10 years?	Eligible Future Cost Basis
Replace Comminutor (4)	\$ 81,000	N/A	\$ 134,720	No	\$ -
Reline Lagoon No. 2 (4)	\$ 98,000	N/A	\$ 162,994	No	\$ -
WWTP Upgrade to MBR	\$ 7,822,000	2029	\$ 13,009,603	Yes	\$ 13,009,603
Replace Influent Pump Station Force Main (5)	\$ 121,000	2029	\$ 201,248	Yes	\$ 144,480
Reline Lagoon No. 3 (4)	\$ 98,000	N/A	\$ 162,994	No	\$ -
Refurbish Chlorine Equipment (4)	\$ 20,000	N/A	\$ 33,264	No	\$ -
Reserves for Annual Maintenance	\$ 5,000	Annually	\$ 8,316	No	\$ -
Total Capital Projects Cost:	\$ 8,245,000		\$ 13,713,139		\$ 13,154,083

NOTES:

- (1) 2011 estimated costs based upon 2011 WWTP Engineering Report (ER) and 2012 Comprehensive Sewer Plan.
- (2) Schedule based upon 2012 Comprehensive Sewer Plan or current direction.
- (3) 2025 estimated costs based upon November 2025 Seattle Engineering News Record Construction Cost Index compared to 2011 ENR CCI.
- (4) Project determined in 2025 to be unnecessary or replaced with upcoming WWTP upgrade.
- (5) Item will be re-used with new WWTP.

Table 4
Sewer GFC Update
Whatcom County Water District 13

General Facilities Charge Calculation	10 Year CIP: Year 2025 RCEs (692) WWTP: Capacity RCEs (1,200)
Existing General Facility Component	
Original Plant in Service (incl. interest)	\$1,760,587
Less: Facilities replaced in 10-Year CIP (1)	(\$570,194)
New Assets/Facilities added since 1977 (2)	<u>\$1,420,041</u>
Total Existing Asset Cost Basis	\$2,610,434
Existing RCEs (2025)	471
Existing Facility Charge per RCE	\$5,542
Future General Facility Component	
New WWTP (Capacity = 1,200 RCEs)	\$13,009,603
Other 10-Year CIP to Serve Growth (3)	<u>\$144,480</u>
Total Future Cost Basis	\$13,154,083
RCEs for WWTP Costs (4)	1,200
RCEs for Other 10-Year CIP to Serve Growth (5)	692
Future Facility Charge per RCE	\$11,050
TOTAL GFC PER RCE	\$16,592

NOTES:

- (1) Per 2011 ER/2012 GSP: WWTP to be replaced within 10-Year period except control building and lagoons.
- (2) New facilities includes engineering studies and items to be re-used with new WWTP.
- (3) See CIP Table (Table 3).
- (4) Existing and future customers benefit from new facilities.
- (5) Reflects 10 years of growth from current RCE count, based on draft General Sewer Plan/Engr Report.