

Chapter 1 : Description of Water System

1.1 Ownership and Management

This Water System Plan (WSP) pertains to the City of Sumas public water system. The system has the identification number **84870B** as assigned by the Washington State Department of Health (WDOH). The system is known as the “**Sumas Water Department**” in WDOH official records. The system is owned by the City of Sumas, which is a municipality established pursuant to the authority of Title 35A RCW, the optional municipal code.

Sumas is organized under the Mayor-Council plan of government, as established in chapter 35A.12 RCW. In this plan of government, an elected mayor is the chief executive officer and is in charge of all departments, including the water utility. The mayor has authority to hire necessary staff and delegate responsibility for day-to-day utility operations. An elected five-member council establishes policies and regulations and appropriates funds to conduct operations. A detailed description of Sumas’ management and decision-making structure is included in chapter 6.

A copy of the current Water Facilities Inventory form is included as Figure 1.

1.2 System Background

History of System Development

Original settlement in Sumas occurred in the late 1800s and was supported by the presence of springs at the toe of the slope of the glacial upland immediately northwest of town, near the site of the current Sumas Wellfield. A diversion box was used to collect spring water and guide it into a ditch heading west along Kneuman Road to town. Eventually a small reservoir was built atop Moe’s Hill, and a pump station was used to pump water from Kneuman Road to the reservoir. Over time, a larger 155,000 gallon reservoir was installed and the ditch was replaced by an AC pipe.

This early growth was dependent upon timber and mining booms in the immediate area, and the population of Sumas swelled to about 2,500. There are historic turn-of-the-century plats extending over a much wider area than the existing developed town. By the 1920s the mining and timber booms had concluded and Sumas had shrunk to a size of less than 700 people. Throughout the middle 1900s, Sumas maintained a stable size and thrived upon border related commerce and agricultural-related services.

Provision of water to surrounding dairy farms began during the middle part of the century. Between 1959 and 1971, three wells were drilled and water was supplied to the City of Nooksack and the rural area to the south. Sumas and the rural area to the east were also fed from the wells, and everyday use of the spring diversion box was discontinued. The diversion box would now be used only in an emergency. In the early 1970s, Kramer, Chin, & Mayo developed a Water System

Figure 1. Water Facilities Inventory Form

Figure 1. Water Facilities Inventory Form



WATER FACILITIES INVENTORY (WFI) FORM

Quarter: 2
Updated: 01/29/2010
Printed: 01/05/2011
WFI Printed For: Annual
Submission Reason: Annual Update

ONE FORM PER SYSTEM

RETURN TO: Northwest Regional Office, 20435 72nd Ave S STE 200, Kent, WA, 98032

1. STEM ID NO. 84870 B	2. SYSTEM NAME SUMAS WATER DEPT	3. COUNTY WHATCOM	4. GROUP A	5. TYPE Comm
---------------------------	------------------------------------	----------------------	---------------	-----------------

6. PRIMARY CONTACT NAME & MAILING ADDRESS ROD FADDEN [MANAGER] PO BOX 9 SUMAS, WA 98295		7. OWNER NAME & MAILING ADDRESS SUMAS, CITY OF NEED PRIMARY CONTACT OWNER TITLE: OWNER ORG - PRIMAR PO BOX 9 SUMAS, WA 98295	8. Owner Number 005729
STREET ADDRESS IF DIFFERENT FROM ABOVE ATTN ADDRESS CITY STATE ZIP		STREET ADDRESS IF DIFFERENT FROM ABOVE ATTN ADDRESS CITY STATE ZIP	

9. 24 HOUR PRIMARY CONTACT INFORMATION		10. OWNER CONTACT INFORMATION	
Primary Contact Daytime Phone: (360) 988-5711		Owner Daytime Phone:	
Primary Contact Mobile/Cell Phone:		Owner Mobile/Cell Phone:	
Primary Contact Evening Phone:		Owner Evening Phone:	
Fax: (360) 988-8855	E-mail: rfadden@cityofsumas.com	Fax:	E-mail:

WAC 246-290-420(9) requires that water systems provide 24-hour contact information for emergencies.

11. SATELLITE MANAGEMENT AGENCY - SMA (check only one)

Not applicable (Skip to #12)

Owned and Managed SMA NAME: _____ SMA Number: _____

Managed Only

Owned Only

12. WATER SYSTEM CHARACTERISTICS (mark ALL that apply)

<input type="checkbox"/> Agricultural	<input type="checkbox"/> Hospital/Clinic	<input checked="" type="checkbox"/> Residential
<input checked="" type="checkbox"/> Commercial / Business	<input checked="" type="checkbox"/> Industrial	<input checked="" type="checkbox"/> School
<input type="checkbox"/> Day Care	<input type="checkbox"/> Licensed Residential Facility	<input type="checkbox"/> Temporary Farm Worker
<input type="checkbox"/> Food Service/Food Permit	<input checked="" type="checkbox"/> Lodging	<input checked="" type="checkbox"/> Other (church, fire station, etc.):
<input type="checkbox"/> 1,000 or more person event for 2 or more days per year	<input checked="" type="checkbox"/> Recreational / RV Park	

13. WATER SYSTEM OWNERSHIP (mark only one)				14. STORAGE CAPACITY (gallons)
<input type="checkbox"/> Association	<input type="checkbox"/> County	<input type="checkbox"/> Investor	<input type="checkbox"/> Special District	500,000
<input checked="" type="checkbox"/> City / Town	<input type="checkbox"/> Federal	<input type="checkbox"/> Private	<input type="checkbox"/> State	

--- SEE NEXT PAGE FOR A COMPLETE LIST OF SOURCES ---

WATER FACILITIES INVENTORY (WFI) FORM - Continued

1. SYSTEM ID NO. 84870 B	2. SYSTEM NAME SUMAS WATER DEPT	3. COUNTY WHATCOM	4. GROUP A	5. TYPE Comm
-----------------------------	------------------------------------	----------------------	---------------	-----------------

15 Source Number	16 SOURCE NAME LIST UTILITY'S NAME FOR SOURCE AND WELL TAG ID NUMBER. Example: WELL #1 XYZ456 IF SOURCE IS PURCHASED OR INTERTIED, LIST SELLER'S NAME Example: SEATTLE	17 INTERTIE INTERTIE SYSTEM ID NUMBER	18 SOURCE CATEGORY											19 USE	20	21 TREATMENT				22 DEPTH DEPTH TO FIRST OPEN INTERVAL IN FEET	23 CAPACITY (GALLONS PER MINUTE)	24 SOURCE LOCATION					
			WELL	WELL FIELD	WELL IN A WELL FIELD	SPRING	SPRING IN SPRINGFIELD	SEA WATER	SURFACE WATER	RAINFY / INF. GALLERY	OTHER	PERMANENT	SEASONAL			EMERGENCY	SOURCE METERED	NONE	CHLORINATION			FILTRATION	FLUORIDATION	IRRADIATION (UV)	OTHER	1/4, 1/4 SECTION	SECTION NUMBER
S01	InAct 09/14/2004 WELL # 1				X									X								58	20	SE NE	33	41N	04E
S02	WELL # 2				X									X								47	240	SE NE	33	41N	04E
S03	WELL # 3				X									X								47	240	SE NE	33	41N	04E
S04	InAct 03/23/1998 WELL # 4				X									X								68	800	SE NE	33	41N	04E
S05	WELL #5				X									X								59	800	SE NE	33	41N	04E
S06	WELLS 2 & 3 to Nooksack & NVWA				X									X								47	500	SE NE	33	41N	04E
S07	WELLS 4R & 5 To Sumas & SRWA				X									X								45	1500	SE NE	33	41N	04E
S08	WELL 4R				X									X								45	800	SE NE	33	41N	04E
S09	MAY RD WELL 1 to Sumas & SRWA			X										X								44	200	SW SW	33	41N	04E

Comprehensive Plan as part of an extensive utility analysis coincident with installation of a sanitary sewer system. In 1982, the existing 500,000 gallon reservoir was installed.

In the mid 1980s, Sumas began to pursue industrial development. The existence of adequate water, coupled with the border crossing and the confluence of several transportation facilities (Burlington-Northern rail, SR9, SR547, SR546, BC Highway 11, the Trans-Canada Highway, and two major cross-border natural gas pipelines) fostered the development of several industrial uses, including a truck-rail reload facility, a gas-fired cogeneration plant with associated lumber kiln, and a shingle-manufacturing facility. The Port of Bellingham was an important partner in the development of the Sumas industrial area. To support the needs of new industries, a fifth well was drilled at the Sumas Wellfield, and the May Road Wellfield was purchased from the City of Lynden and outfitted with two new wells.

The recent industrial growth has brought increased demand for housing. More industrial growth is expected, and more residential and commercial growth will also follow. The comprehensive plan envisions a town of about 1,600 people by the year 2018.

Geography

The only geographic boundaries affecting the Sumas service area are the jurisdictional limits of neighboring purveyors. There are no natural features or man-made structures presenting significant barriers to provision of water service in the vicinity of Sumas. As discussed immediately below, Sumas directly or indirectly provides water to a large area extending about 7 miles south of town. The international border with Canada generally prevents northward extension of the service area, although Sumas did historically provide water to the nearby community of Huntingdon, B.C. This service was largely discontinued in 1989, and only two Canadian customers remain.

See the "General System Description" below for a description of the aquifer supplying Sumas' water and for a description of the two pressure zones.

Neighboring Purveyors

There are three water systems abutting Sumas. To the north is the water system of the City of Abbotsford, B.C. To the south and southwest is the Nooksack Valley Water Association (NVWA), and to the southeast and east is the Sumas Rural Water Association (SRWA). The latter two associations are wholesale customers that rely upon Sumas for their entire supply. Together with the City of Nooksack, which is a nonadjacent wholesale customer, the rural associations account for about 85 percent of the water pumped from the Sumas Wellfield and occupy a 25-square mile region in the north-central part of Whatcom County. Figure 2 shows the Sumas service area in relation to the neighboring rural associations.

Figure 2. Neighboring Purveyors

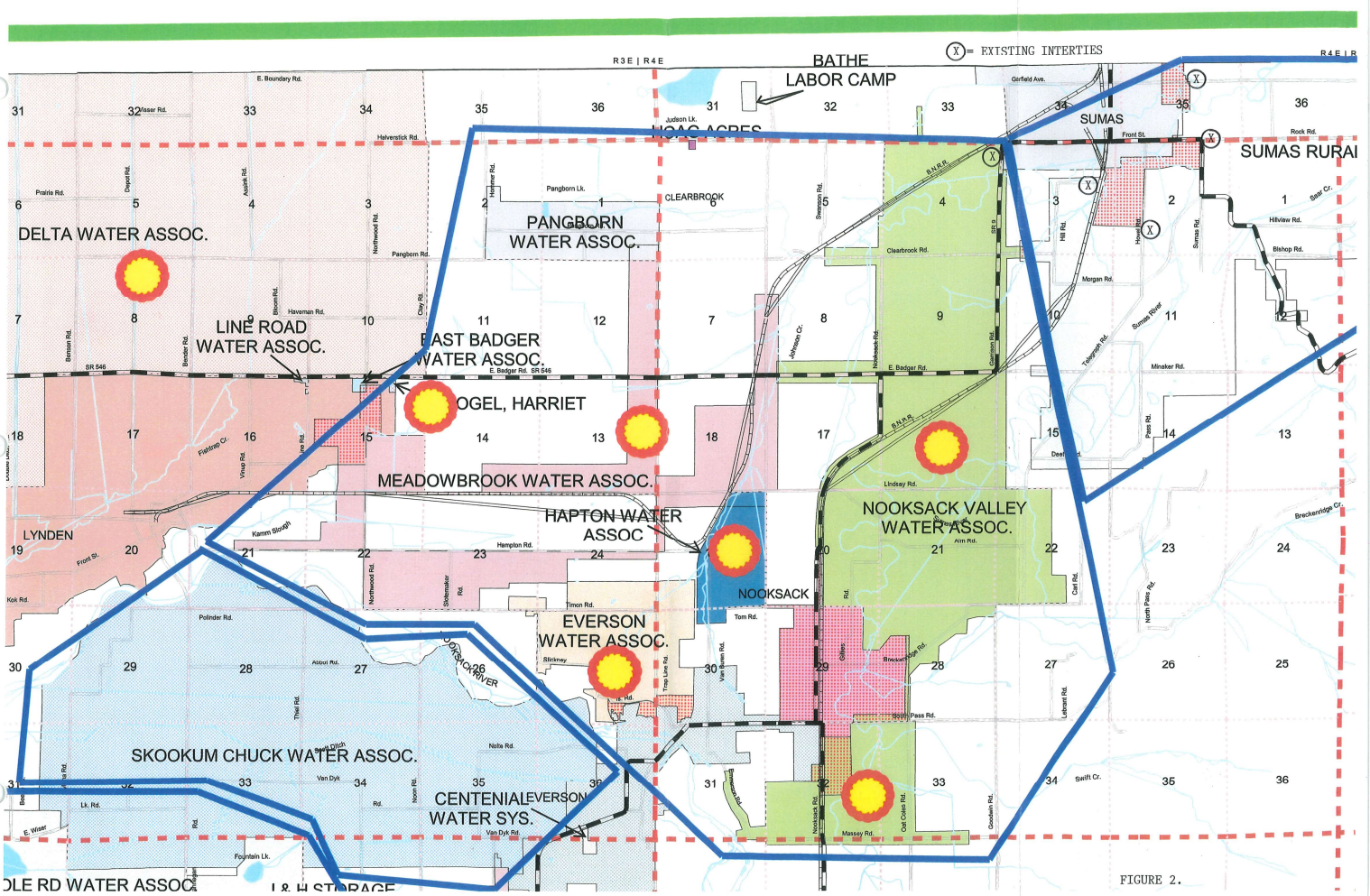


FIGURE 2.

Ordinances/Bylaws

Included in Appendix A is a copy of Chapter 20.98 of the Sumas Municipal Code, which establishes improvement standards within new subdivisions. Chapter 20.98 is remarkably brief. The design standards adopted within chapter 7 of this WSP are far more extensive and will be adopted by ordinance.

1.3 Inventory of Existing Facilities

Following is a brief summary of the existing water system. A detailed assessment of the system's capabilities and inadequacies is performed in Chapter 3. Figure 3 shows the general layout of existing facilities.

General Description of System

Source. The source of potable water is the Sumas Wellfield, which contains five wells. The wells draw water from the Abbotsford-Sumas aquifer, a glacial sand and gravel upland covering the north end of Whatcom County and extending into lower British Columbia. Although artesian flow conditions exist at each well, submersible pumps or booster pumps are installed to achieve adequate pressure. The wells supply two distinct distribution zones. Three of the wells are used to supply wholesale customers south of town, including the NVWA and the City of Nooksack. Two of the wells supply Sumas itself and the SRWA, which is located east of town. The two distribution zones normally operate independently, but an intertie is available to allow emergency supply from one system to another.

The City also operates the May Road Wellfield, tapping the same aquifer, there are two wells in the wellfield one serves our industrial customers and the other is tied into the Sumas distribution system.

Treatment. Groundwater from the Sumas Wellfield is not "under the influence of surface water," so no filtration is performed. Chlorination is normally not performed, but equipment is available to inject chlorine into the distribution mains near the wellfield when bacterial testing indicates the need. The need arises infrequently. Perhaps once every couple of years coliform is detected somewhere in the combined distribution network of Sumas and its wholesale customers, always related to construction projects. Coliform has never been traced back to the wells themselves.

Storage. Sumas owns a 500,000 gallon reservoir located at the top of Moe's Hill. A second 500,000 gallon reservoir was built in 2001 next to the existing reservoir and is owned by the SRWA. Storage within the Nooksack/NVWA zone is accomplished at reservoirs jointly owned by those entities.

Distribution. Within city limits is a distribution system consisting of 94,000 linear feet of pipe ranging from 1 to 12 inches in diameter. Major lines lead from the Sumas Wellfield along the Canadian border to the reservoir, and along Barbo Road and Halverstick Road to the south end of

Cherry Street. A network of smaller pipes distributes water throughout the developed part of town.

Existing Service Connections

There are 500 existing connections served directly by the Sumas Water Department. An additional 30 residential connections are approved but not yet built. There are also 8 installed commercial services that are not in use because of economic circumstances, but that might resume service at any point.

Interties

The Sumas water system is interconnected at five separate locations with the neighboring water association systems: (1) at Garrison's Corner with NVWA; (2) at Easterbrook Road with NVWA; (3) at Hovel Road with SRWA; (4) at Rock Road with SRWA; (5) at Jones Road with SRWA.

1.4 Related Plans

Following is a brief discussion of interrelationships between this WSP and other planning documents:

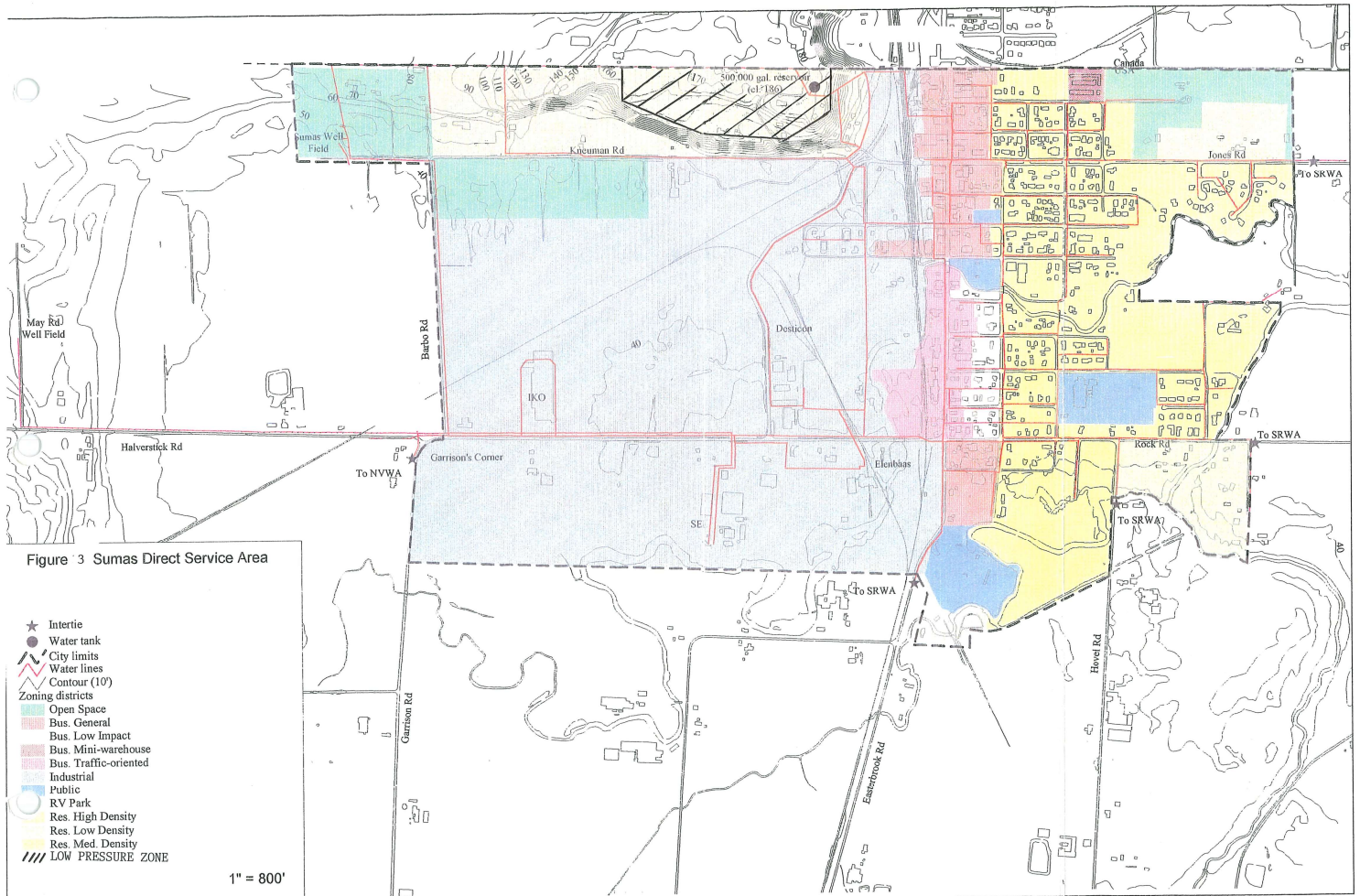
Comprehensive Land Use Plan (CP). Sumas is required to plan under the Growth Management Act (GMA) and has adopted a GMA-compliant CP. The most recent revision to the CP occurred in November 2004 and was used in preparation of this WSP. The WSP is consistent with the CP in that the population projection, existing land use data, and future growth scenarios presented in this WSP are drawn from the CP, and the proposed Sumas system service area is identical to the UGA identified in the CP.

Wellhead Protection Program (WHP). Sumas adopted a WHP in 1996. The WHP was developed in accordance with WDOH guidelines and is incorporated by reference as a part of Chapter 5 of this WSP.

Whatcom County Comprehensive Land Use Plan (WCCP). Whatcom County adopted a GM-compliant land use plan in 1997. This WSP is consistent with the WCCP in the following ways:

- The WCCP policies related to prohibition of urban water service outside the UGA (i.e., CWPPs F4, F5, F6, F7, WCCP policy 5L-3) are supported by the water supply policies discussed later in this chapter.
- The WCCP policies concerning planning for and provision of water within the UGA (i.e., CWPPs D3, N4, WCCP policies 5M-2, 2Y-1) are supported by the planning effort leading to development of this WSP.
- The WCCP policies concerning water conservation and water quality protection (i.e., CWPPs N1, N2, N3, N4, WCCP policies 2Y-4, 2Y-5) are consistent with the conservation element within Chapter 4 and the WHP within Chapter 5.

Figure 3. Existing Service Area and Facilities



Whatcom County Coordinated Water Supply Plan (CWSP). Whatcom County adopted a CWSP in 2000 and was approved by WDOH. The City of Sumas has been an active participant in CWSP development and is a member of the Water Utility Coordinating Committee (WUCC). City staff contacted Rebecca Schlotterback of Whatcom County PUD she stated they have been in talks with Whatcom County and WSDOH on updating the (CWSP) plan. They have not determined who the lead agency will be but funding has been secured from local EDI funds, they expect work to begin in 2012. There are no inconsistencies between this WSP and the CWSP. Consistency between the two plans is specifically evidenced in the following ways:

- The service area declaration required by the CWSP is included within this WSP.
- The WSP and CWSP establish identical future service area boundaries for Sumas and identify Sumas as an expanding system.
- The design standards established in the CWSP are met or exceeded by the standards established in this WSP

Other WSPs. SRWA and NVRWA, City of Nooksack are currently working on water comprehensive plans.

Comments Regarding Relationships of Plans

The City of Nooksack and the Nooksack Valley Water Association entered into a new contract in June of 2002 an amendment to the agreement to increase the instantaneous flow to 904.2 gpm and increase the annual acre feet to 569.6 was approved in April of 2009. A new contract with the Sumas Rural Water Association to increase the acre feet from 470 to 600 and the instantaneous flow from 500 to 1,1000 was approved in November of 2011

Identification of Adjacent Purveyors

Sumas' neighboring purveyors are the Nooksack Valley Water Association and the Sumas Rural Water Association. Appendix C contains copies of the letters sent to those systems by Sumas to inform them of this WSP planning effort and to solicit their comments. Their responses are also included in Appendix C.

1.5 Existing Service Area Characteristics

Figure 3 shows the existing service area of Sumas' system, together with current zoning districts. The map also shows the locations of roads and buildings, which helps reveal the location and intensity of existing land use.

Generally, Sumas is bisected by the Burlington-Northern rail lines that run north through town to the Canadian border. To the west of the tracks is the industrial district. There are four significant facilities scattered within the district, occupying only about a quarter of the available acreage. The facilities are: (1) IKO, a manufacturer of asphalt shingles, which has a demand of about 7,000 gpd; (2) SEI, an electric cogeneration plant with an associated lumber kiln, which

has a demand of about 650,000 gpd, met from the May Road Wellfield; (3) Elenbaas, a feed mill; (4) Desticon, a truck-rail reload facility with an insignificant water demand. The facilities are noted on Figure 3.

Also west of the tracks, adjacent the Canadian border, is a panhandle of residential zoning. The panhandle was recently annexed and contains more than 30 homes at this point.

Immediately east of the tracks is the commercial district. There is little vacant land within the commercial district, but not all of the existing development is actually commercial in nature. At the south end of town, some commercial land is still occupied by homes. Commercial development mostly is designed to serve the drive-through traffic generated by the border crossing. There are several gas stations, most with associated mini-marts, and there are several taverns and restaurants. There is also border-related development at the north end of the district, including the Customs facility and several brokerage offices. Aside from the tourist- and border-related development, there is the typical development found in a small town: grocery store, pharmacy, bank, laundromat, hair salon, doctor's office, post office, city hall, legion hall, realtor, insurance office, auto-parts store. In terms of water usage, the taverns and gas stations create the major demands within the commercial district.

East of the commercial area is the historic residential district. Most development within the district is single-family homes, but there are two churches, a school, a library, and about 12 multi-family structures. The density of development is not great (i.e., average lot size of almost 13,000 sq. ft.), because homes were served by septic systems until 1972. There is some infill occurring within the district, but flood regulations generally prohibit any major increase in density within much of the district. Newer residential development is occurring on higher land at the northwest corner of the district and at the south end of town.

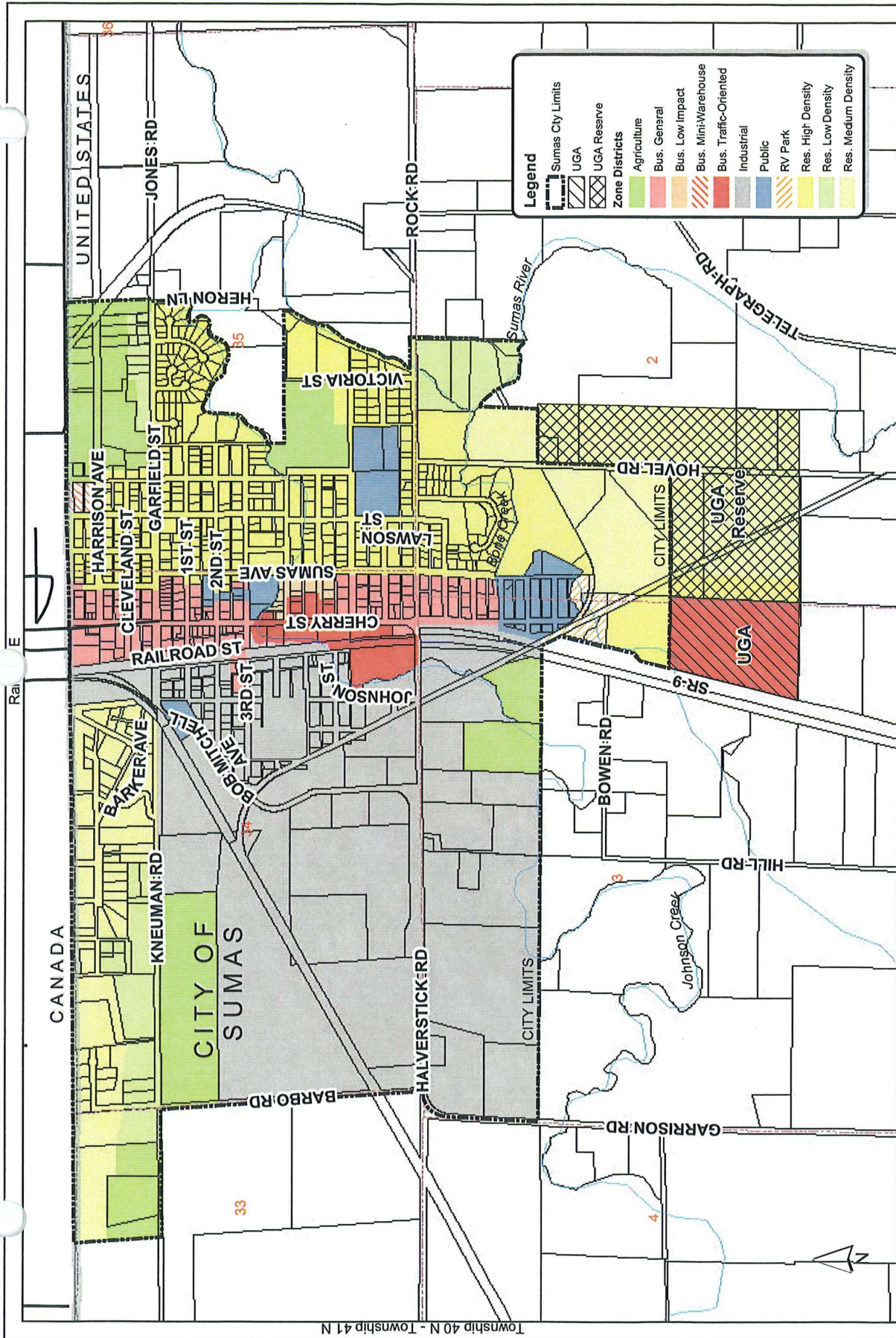
1.6 Future Service Area

Sumas intends to expand its service area over time. Figure 4 shows the extent of the future service area. The service area boundary is almost identical to the Urban Growth Area established within the comprehensive plan. As discussed earlier, two rural water associations currently provide service to unincorporated areas immediately adjacent to Sumas. Each expansion of Sumas' service area must therefore be accompanied by a corresponding decrease in the service area of a neighboring system. Diagonal cross-hatching is included on Figure 4 to show the locations of lands that will be annexed into Sumas' service area over time.

The proposed service area is justified in a number of ways.

- *Logical boundaries.* The proposed boundaries are regular in shape and generally follow significant physical features, such as roads.

Figure 4. Current Zoning and Future Service Ares



DATA SOURCES:
 Whatcom County Assessor's
 Office & Planning Department,
 and the City of Sumas

CITY OF SUMAS, WA Current Zoning and Future Service Area

PROJECTION:
 UTM Zone 10 North
 NAD 27
 SCALE: 1:15,840
 FIGURE 4 PAGE 1-12



Township 40 N - Township 41 N

- *Ability to serve.* The expansion area is in fact already served indirectly by Sumas, because each neighboring water association is a wholesale customer of Sumas. Also, Sumas has permits for water rights in excess of current consumption, as is discussed in chapter 4.
- *Consistency with city and county plans and goals.* The Sumas CP advocates a steady increase in the size of the town over the coming 20 years. The WCCP allows for this growth, and in fact encourages industrial development in the eastern part of the county (WCCP policy 7K-6).
- *Geographic factors causing growth.* The transportation facilities discussed earlier (see section titled “History of System Development”), in conjunction with availability of water, will continue to draw industrial development to Sumas.

There have been no disputes with neighboring water associations during past annexations. The zoning of the surrounding unincorporated lands is Agricultural, so the pattern of existing development is sparse. There are only 16 homes within the 240 acres identified for eventual transfer, and there is no significant value to the pipes now serving those homes. Each annexation occurs as a result of a petition initiated by the land owner, and the landowners’ desires to withdraw from an association have always been respected.

1.7 Service Area Declaration

Chapter 10 contains a copy of the service area declaration form filed with Whatcom County as a part of the CWSP planning process.

1.8 Service Area Policies and Conditions

Policy 1: Sumas shall continue wholesale provision of potable water to the Nooksack Valley Water Association, the Sumas Rural Water Association, and the City of Nooksack. The volume of water allocated to each customer shall be sufficient to accommodate 20 years of the customer’s planned growth, as established in the land use CP pertaining to each customer as of November 2004.

The City Of Sumas has been asked to supply water to wholesale customers to the West. This area could include the Meadowbrook, Northwood, Hampton and Everson Water Associations. These Associations have Health issues such as in high nitrates and lack of adequate water rights, at the July 28th 2008 City Council meeting the Council agreed endorse this plan.

The latest proposal is to transfer some of Sumas’s water rights to the Meadowbrook’s well site on the Van Buren Road. The City of Sumas has not received an official request to transfer these water rights at this time. This proposal would not require any improvements to the Sumas system.

Policy 2: Sumas shall not provide wholesale potable water for domestic use to any customer other than those identified in Policy 1.

Policy 3: Sumas shall continue wholesale provision of nonpotable (industrial) water to Puget Sound Energy. This water allocation is compatible with existing source capacity and water rights.

Policy 4: At the discretion of the City Council, provision of wholesale water to additional industrial customers may occur. In each such case, the terms of service shall be established in a written agreement approved by the City Council. See Tables 2-1 and 2-2 for a summary of water allocations and available capacity.

Policy 5: Sumas shall not allow wheeling of water within City-owned facilities. Wheeling means the transportation of water that is supplied by some entity other than the City and that is delivered to a person that is not a wholesale or retail customer of the City.

Policy 6: Sumas shall not approve new retail water service to any person outside City limits, except in cases where human health is threatened as determined by the Whatcom County Health Department.

Policy 7: Sumas shall not approve system extensions to serve urban uses outside the UGA. Sumas may approve extensions to serve rural uses outside the UGA, provided that the target site is within the Sumas service area. Where such an extension is made, the maximum number of connections shall be consistent with county zoning and shall be specified in a legally binding document at the time the extension is approved.

Policy 8: Service to new developments within the service area shall be provided only by direct connection to City facilities. No remote or satellite systems shall be allowed.

Policy 9: Distribution facilities within areas transferred from neighboring systems into City service shall be improved to meet City design and performance standards. The improvement shall either be performed by the neighboring system prior to transfer, in which case the new customers shall pay no hookup charge, or shall be performed by the City after transfer, in which case the new customers shall pay the standard hookup charge established in City code.

Policy 10: Water facilities within new developments shall be installed consistent with the design and performance standards established in Chapter 7 of this Water System Plan.

Policy 11: All water rates and regulations, hookup cost and Local area facilities charges shall be regulated by chapter 12.04 of the Sumas Municipal Code.

Policy 12: Facilities necessitated by new development, either on or off the development site, shall be funded solely by the developer, except when oversizing is required by the City. Oversizing means construction of a facility that is larger than would have been required, according to the design standards established in this plan, to accommodate only the new development. Oversizing does not include a facility designed to accommodate the new development, according to minimum applicable standards, that incidentally provides benefits or capacity to customers outside the new development. When oversizing is required by the City, the City shall pay project costs that are in excess of the cost of the facilities that would otherwise

have been required by the minimum applicable standards. If developer-funded facilities provide incidental benefits or capacity to undeveloped parts of the service area, the City shall allow the developer to file a latecomer agreement to recover a fair share of the cost from the future development benefiting from the facilities.

Policy 13: No cross-connection shall be allowed that would endanger the potable water supply of the City. As a condition of service, backflow preventers and/or other cross-connection control devices shall be installed at the customer's expense, as required by the City.

Policy 14: The process for requesting a new service regardless if it is an individual or group services is as follows. The requester must fill out an Service Request Form at City Hall once the hookup fee has been paid a work order is issued to the water Utility crew which generally has the meter set in 48 hours. We have done extensive modeling that has shown we have adequate capacity and sufficient water rights till 2030 and still a balance of water rights at that point. The City foresees no non-technical issues related to annexation or water rights issues, when property is annexed into the City the policy has been to buy the existing infrastructure from the adjacent water purveyor.

1.9 Wholesale Service Area:

Figure 2. map shows our neighboring wholesale customers Sumas Rural Water Assoc. in Blue to the East and South, Nooksack Valley Water Assoc. in Green to the West and Southwest and the City of Nooksack in Pink to the Southwest. The City has had long term contacts with these wholesale customers and will assure them the water as required in the Agreements. Also in Figure 2. Meadowdale , Northwood and Northwood Park are the area in Light Red to the West that someday could become potential customers.

1.10 Complaints

There has been no log of customer complaints maintained in the past, so no synopsis of the number and type of complaints is available. Staff informally report that two kinds of complaints seem to have occurred most often. First, customers have complained of irregularly high water bills. In most cases, the problem has been a leak downstream of the meter, the part of the service that is the owner's responsibility. Second, customers have complained of instances of low pressure. These complaints have usually been associated with major leaks or with planned maintenance activities such as hydrant flushing and line repairs.

Section 6.8 of this WSP establishes that Sumas will develop a new water system log. A report form will be completed and added to the log as a result of each customer complaint. The form will also contain a record of the response made by the City. A copy of the report form will be

provided to the complainant upon resolution of the problem. The forms can be reviewed when this WSP is next updated.