

# **ECOLOGY COMMENTS AND RESPONSES TO COMMENTS FOR THE NEWPORT WASHINGTON 2023 GENERAL SEWER PLAN**

## **Contents**

<b>Submittal Date</b>	<b>Comments Received</b>	<b>Page Number</b>
First Submittal, December 2022	February 2023	1-18
Second Submittal, May 2023	September 2023	19-20
Final Submittal, October 2023	N/A	N/A

Prepared by

**J-U-B ENGINEERS, Inc.**  
999 W. Riverside Ave, Suite 700  
Spokane, WA 99201

## **Responses to Ecology Comments –**

**Original Submittal Date: December 2022**  
**Comments Received: February 2023**

Page	Comment Number	Section or Figure	Washington Department of Ecology Comment	Response
Cover Page	1	N/A	The requirements for the GSP are found in WAC 173-240-050 not 173-240-060.	Noted.
ES-1	2	Executive Summary	<p>This indicates that the WBWSD is not part of the evaluation other than identifying the flow to be discharge to the Newport system. The contract between Newport and the WBWSD must include the roles responsibilities of both parties. This includes the WBWSD's responsibility to:</p> <ol style="list-style-type: none"> <li>1) Evaluate, identify, and address I&amp;I in the collection system.</li> <li>2) Include right of entry and inspection of the collection system.</li> <li>3) Reporting of sanitary sewer overflows (SSOs)</li> <li>4) Providing a list of industrial or commercial operations that impact the quality of the wastewater discharging to the Newport treatment system.</li> </ol>	<p>Executive summary sentence has been revised to now indicate the contract between Newport and WBWSD is discussed in the report. Refer to GSP Sections 1.5 and 1.5.1 for added discussion of the contract.</p> <p>Note that the City of Newport is drafting a new agreement to replace the existing agreement. The requirements identified by Ecology review are included in recommendations.</p>
ES-1	3	Executive Summary	NPDES Permit conditions G21 requires the permittee to submit any proposed contract for the operations of any wastewater treatment facility covered by this permit to the Department for review. This includes a contract that delegates authority to WBWSD to operate and maintain the collections system (which is permitted under the NPDES permit) discharging to the Newport treatment facility.	See response above. The requirement of NPDES Permit Conditions G21 are mentioned in the added report section (See GSP Section 1.5.1).
1-5	4	Figure 1-2	Please verify that this figure includes the future growth boundary.	The figure did not include the future growth boundary. Figure 1-3 "Future Land Use Map for City of Newport, WA" has been added showing UGA and future land use in UGA. Existing zoning and future land use figures were retrieved from the City's posted planning documents.
1-6	5	1.4.4	Were there any likely Tribal activities in the Newport area within the system future boundary.	<p>The Washington Department of Archaeology and Historic Preservation's WISAARD database identified four sites that are eligible for listing on the National Historic Register of Places (NRHP) in the future service area. Sewer in these areas is anticipated to occur as private development. None of the proposed improvements done by the City to alleviate system deficiencies would occur in the vicinity of the eligible sites.</p> <p>Note: Based on the predictive model in WISAARD, the majority of the City of Newport contains areas that are Very High Risk and High Risk of discovering cultural resources, and a survey is highly advised.</p> <p>This information has been added to this section.</p>

2-1	6	2.2	The data provided does not adequately support the proposed growth rate. Either provide the model and data that demonstrates a 2.5 % growth rate or identify the appropriately modeled growth rate.	<p>The assumptions and rationale for a growth rate much higher than the historical have been added to the GSP. The growth in surrounding communities was used as a guide for estimating Newport's future growth. Recent interest in Newport would indicate the community is poised for the growth which neighboring communities have experienced. Even if that growth rate is not recognized in the planning period, it was considered necessary to evaluate system capacities based on that higher growth. The preferred treatment alternative, repair and upgrades of the existing plant, does not include any improvements that increase the capacity of the existing plant, since increased capacity is not needed in the planning period even with the higher growth rate. Collection system capacities are also adequate for the planning period, even with the higher growth rate, so no facilities will be oversized if that growth rate is not realized.</p>
2-1	7	2.2	Please identify these communities with growth percentages of 2.5% or greater. Ecology is not aware of any small communities with a growth rate greater than 1 percent in the area of Newport.	
2-1	8	2.2	Growth rate is a very important parameter in the evaluation of the community's infrastructure needs. What is the difference in design flows relative to rate of 0.94% and 2.5%? Ecology has several small communities with over designed facility that are very difficult to operate in compliance with the permit. If Newport is not going to use a growth rate based on historic rates, then they must provide substantive support for the proposed growth rate.	
2-2	9	Figure 2-1	This figure demonstrates how much the identified growth rate deviates from the historic rate. Please provide the data use to support the projected growth.	
3-12	10	Figure 3-1	Please include the growth boundary of the current system, the projected future growth boundaries on all drawings for the collection system.	<p>All chapter 3 figures of the collection system have been revised to now include the existing and projected future growth boundary of the sanitary system.</p> <p>Note: The report now only includes an overview figure showing sewer assets and service boundaries. A second figure indexing pipe segments by name and a table containing attribute information of each pipe segment (size, material, slope, capacity, etc.) are now included in the Appendix and referenced in the report. This is a cleaner way to convey the data required by WAC 173-240-050 for collection system mapping.</p>
3-1	11	Table 3-1	Please add pipe material type and condition.	<p>The table has been revised to include a summary of pipe length by material and by type. Condition has not been added to the table as there is insufficient data to accurately classify the condition of every pipe in the collection system. The City should refer to CCTV inspection results (Section 3.1.5 and Appendix B) for a summary of pipe condition for pipe segments that were inspected using budget available for this planning study. As noted in other comments provided by Ecology, the plan recommends a CCTV inspection program to the City, including the inspection of pipes that were not included in this plan. Pipe information to be updated during CCTV efforts.</p>

3-7	12	3.1.1	This system is discharging to the treatment works as a result, it is covered under the permit. Please include a figure with the Oldtown boundaries present and future. Please also obtain and include the Sewer line drawings and a table similar to Table 3-1 or add this info to table 3-1.	A figure of Old Town's collection system is included in Chapter 3. A table has been prepared summarizing the known pipeline attribute information and included in Chapter 3. The growth of Old Town is not included as this is not the responsibility of Newport. Idaho does not establish Urban Growth Areas, and the Old Town sewer service is being provided by a utility district rather than a municipality. The West Bonner Sewer District planning and engineering staff should evaluate what growth they may allow without violating their agreement with Newport.
3-8	13	3.1.1	Does Newport have a sewer ordinance? Please include the ordinance as an appendix to the report.	The Newport Sewer System Policy, passed in July, 2022, has been added in a revised Appendix A and the other appendices renumbered.
3-8	13	3.1.1.2	An aerial view of Oldtown appears to show industrial discharger in the vicinity of Oldtown system. Please list all industrial dischargers to the Oldtown system. Please indicate where the industry discharges if not to Oldtown and provide their permit number.	The Idaho Department of Environmental Quality Issued Permits and Water Quality Certifications data base and the Washington Department of Ecology Water Quality Permitting and Reporting Information System (PARIS) were searched for upstream and downstream discharges to the Pend Oreille River. Figure is include in report.
3-8	14	3.1.2	This section appears to indicate that collection system pipe installed after the circa 1950's is PVC. That may not be a very accurate statement. Drawings for 1970's collection system through the present are available from Ecology and may have all the information needed to identify pipe lengths and materials.	Sewer improvement drawings from the 1950s through 2020 were used to develop collection system mapping. The statement is meant to pertain to newer subdivisions that have been constructed around the outskirts of the existing sewer system. It is typical of modern subdivisions to be constructed with entirely 8" PVC. Wording in the report Section 3.1.2 has been revised to describe this.
3-8	15	3.1.2	Paragraph 2 appears to describe storage for a separation of stormwater from a CSO is that correct? Is there an outfall from this old combined system to the river? If this is not the case, please clarify this paragraph. Stormwater must be discussed and a figure showing the stormwater collection system and discharge locations.	<p>The storage was presumably designed and installed to attenuate peak flow events experienced by the wastewater treatment plant. There is no outfall from the storage tank - Only pipe draining the tank back into the sanitary sewer collection system, if the tank were in use. The paragraph has been revised to more clearly explain this.</p> <p>The stormwater system in Newport is very limited, was constructed during the highway construction creating the couplet and is maintained by the City. A brief stormwater section has been added to chapter 3 describing this.</p>
3-9	16	3.1.2	The report indicates that oil and grease is a problem in the collection system. Is there a requirement in the sewer ordinance for oil and grease separators at identified commercial operations that may discharge oil and grease to the collections system?	<p>Refer to Section 13.16.040 "Building Sewers and Connections" of the Newport, Washington Municipal Code stating that grease traps in conformance with the latest version of the Uniform Plumbing Code are to be required at the judgment of the sewer superintendent.</p> <p>This existing requirement has been noted in General Sewer Plan Section 3.1.2.</p>

3-9	17	3.1.2	Please identify whether the sewer ordinance requires sediment trap for identified light industrial or commercial enterprises.	<p>The words "sediment trap" are not explicitly used in the Municipal Code of Newport, Washington; However, Section 13.16.050 "Use of Public Sewers and Duty to Enforce Discharge Prohibitions" adopts public sewer discharge standards of 40 CFR 403.5 (National Pretreatment Standards: Prohibited Discharges) and WAC 173-216-060 (Prohibited Discharges). Included in this is the prohibition of any discharge to the public sewer system containing solid pollutants that could cause obstruction to the flow in sewers or otherwise interfere with the operation. This would include the sediment from industrial or commercial enterprise.</p> <p>Reference to this municipal code excerpt has been added to General Sewer Plan Section 3.1.2.</p>
3-9	18	3.1.2	Please reference Table 3-3 in this paragraph.	Reference has been added.
3-17	19	3.1.5	Please include recommendations for ongoing inspections schedule of the collection system.	A section has been added to the end of the I/I section recommending CCTV inspection and smoke testing.
3-20	20	3.2.1	How does the estimate of wastewater total flow reported by the treatment facility compared to the wastewater estimated flows using water usage?	The average daily flow in October was 0.178 MGD (Newport minus Old Town). Using a population of 2,190 people and 2.3 persons per household results in a flow of 187 gallons per household per day calculated from flow data. The water usage data resulted in a expected sewer flow of 191 gallons per household per day.
3-20	21	3.2.2	Instead of making a comment on each subsection that request a list of deficiencies, please include a table that identifies the deficiencies in each of the subtopics.	Inserted a table in Chapter 3 summarizing lift station deficiencies.
3-22	22	3.3	The GSP is a standalone document. Please include a table with a list of the deficiencies and recommendations.	A table summarizing the observed condition of unit process equipment has been inserted. A description and Figure of the selected alternative have been added, and the section refers readers to the Facility Plan for complete evaluation of alternatives.
4-1	23	N/A	Did JUB contact Ecology for collection system drawings that were “unavailable” from the city? Ecology may have the missing drawings so that the hydraulic modeling this will be complete.	Sewer improvement drawings from the 1950s through 2020 were used to develop collection system mapping. Sewer lines with inadequate data to model are in subdivisions where upstream connections are not anticipated. Flows from the 'unmodeled' lines is assigned to the trunk line that is modeled to capture all flow data.
4-3	24	N/A	The model assumes that there are not any onsite septic systems in the areas modeled. Does the Sewer Ordinance require all onsite system to connect to the collection system? Is there any way to verify this assumption?	Refer to Section 13.16.020 of Newport Municipal Code. It is unlawful to construct new septic systems in Newport City Limits, and any parcel within 200 feet of an existing sewer main is required to connect to the public sewer. Based on tax lot size and the coverage of the collection system, it is unlikely septic systems are still in use within City Limits.

4-16	25	4.6.6	This information is important for planning staffing levels and maintenance schedules. That is why it is important for JUB to access all the available drawings for the models. Additionally, the colors on the map make it difficult to identify the segments in the limited area that was modeled, which will require additional attention once I&I is address. Please add a call out or other method to help clarify areas of concern.	Sewer improvement drawings from the 1950s through 2020 were used to develop collection system mapping. Sewer lines with inadequate data to model are in subdivisions where upstream connections are not anticipated. The pipes without invert elevation data have been added to the figure for reference. Colors have been changed for clarity.
5-1	26	5.1	Please verify your understanding of SSOs. I think there is some confusion with sanitary stormwater overflows. A sanitary sewer overflow (SSO) is a discharge or spill of sewage (in any amount) from the collections system to the ground or a floor, such as a basement, that results from failure of, plugging of and or maintenance of the collection system.	This paragraph has been revised to omit the incorrect SSO sentence.
5-1	27	5.1	There was a statement earlier about a storage vault in the collection system that has not been used in recent years due to the undersized nature of the system. Was that vault built to eliminate a CSO? If so, is there an overflow to the river in the event of failure of the system?	Refer to previous discussion in comments above. The storage vault was presumably constructed to attenuate peak flows experienced at the wastewater treatment plant. Aside from a limited section of storm sewer in the downtown core along Highway 20, the City does not have another storm sewer collection system. There is no infrastructure or City knowledge that suggests the sewer used to be a combined storm/sanitary system. This storage does not have an overflow to the river.
5-1	28	5.1	The original collection system would have been built at a time when it was a common practice to connect roof drains and basement sumps. If there aren't any connections in Newport it is the only community for which I manage a permit that does not have any stormwater or high groundwater connections. Has the collection system been smoke tested to verify that there are not any stormwater connections, roof, or basement sumps connected to the collection system? If not, this should be a recommendation of the I & I evaluation.	At the time of the preparation of the draft GSP, it was the opinion of the Newport building inspector that roof drains are not connected to the sanitary sewer. Research of prior design documents, however, has uncovered a statement that some buildings in the downtown core have roof drains that are connected to the sanitary sewer. There is one instance of a known basement sump pump connected to the sanitary sewer system. I/I improvements include the removal of this cross connection. Smoke testing of the collection system has been added as a recommendation along with further CCTV inspection. See I/I section.
6-1	29	6.1	The arial appears to show some sawmills and possible mechanical shops in the area. Has Newport and Oldtown completed a survey of business licenses issued by the City or County in the vicinity of the collection system?	No survey of business licenses issued by City or County has been done.
7-1	30	7.1	What type of water treatment system does Newport have? Do the discharge any process wastewater to the collection system?	The two wells on the south bench are treated for iron and manganese, but these wells do not discharge to the sewer collection system. Water treatment at the other wells is limited to chlorine feed into the water at the wells as needed. There is no discharge of process water from the municipal water system to the sewer collection system.

7-1	31	7.1.1	The report states that wastewater does not impact water supply because they discharge to the river. This is only true if there is not any exfiltration from the collection system. If there is I&I, then there is exfiltration. Please identify any drinking water wells with a well head in the vicinity of the collection system. Please discuss the potential for exfiltration to impact drinking water wells. This includes private wells and drinking water systems.	Figure in 7.1.1 has now been updated showing active wells retrieved from the previous Newport Water System Plan and the online Washington Department of Ecology well mapping. Discussion of exfiltration has been added. CCTV recommendations prioritize pipelines adjacent to wells for condition assessment.
7-1	32	7.1.1	Are the locations of the City's municipal wells verified on the map? Are all the water wells within the City Limits operated by the city?	Refer to response above. Figure updated with wells from Newport's previous Water System Plan and wells from Department of Ecology online mapping. Well ownership is illustrated with different symbology noted in the legend.
9-1	33	N/A	Please put a table with all the alternatives considered along with the associated costs, pros and cons, recommendations into this chapter.	Table summarizing alternatives has been added.
9-2	34	9.2.2	The rail crossing seems to be of importance. Is it possible to TV the pipeline in this vicinity? What is the age of the pipeline and what are the materials?	Agreed that the rail crossing is of importance to the collection system.  The sanitary sewer pipeline crossing under the rail line was installed with the original collection system in the 1950s. Debris was found in pipelines during CCTV inspection and much of the CCTV budget was consumed by cleaning pipes. The line under the railroad was not inspected as part of these planning efforts.
9-2	35	9.3	Chapter 5 indicated that there were no roofs or other connections to the collection system. However, discussion of I&I indicates that removing sump pump connections are a priority. A smoke test should be conducted to identify illicit connections to the collection system. This should be a priority.	The wording in Chapter 5 has been revised to reflect the fact that there is a known basement sump pump connected to the sanitary system. Smoke testing is included in recommendations to identify any roof drains connected to the sanitary sewer system.
10-1	36	10.1	Please clarify “Effluent Loading Projects – Required to reduce maintenance intensive issues with wastewater quality in the collection system” I am not sure what this means.	This category of improvements are recommended to the City to eliminate the discharge of prohibited contaminants to the sanitary sewer system. The wording has been revised to "User Discharge Loading/Pretreatment - Pretreatment or other recommended projects required to reduce maintenance intensive issues arising from discharges received by sewer users."



Washington Department of Ecology Comment	Comment Response
<p>The GSP is well constructed and mostly complete. A couple of issues remain. The population growth estimates must be modelled and supported. Selecting a growth rate of 2.5% because the city thinks that they will grow 2.5% year over year is not adequate. If the town has applications for developments for the next few years that support this, please include this data</p>	
<p>The growth rate is the most important parameter in the GSP. It is used to make recommendations for sizing pumps and pipes. It is also used in the Engineering Report to develop design criteria for the required plant upgrades. Overestimate of the growth rate results in over sizing the collection and treatment system. This not only results in elevated cost over the 20-year design period but results in a system that is difficult to operate and maintain.</p>	<p>The assumptions and rationale for a growth rate much higher than the historical have been added to the GSP. The growth in surrounding communities was used as a guide for estimating Newport's future growth. Recent interest in Newport would indicate the community is poised for the growth which neighboring communities have experienced. Even if that growth rate is not recognized in the planning period, it was considered necessary to evaluate system capacities based on that higher growth. The preferred treatment alternative, repair and upgrades of the existing plant, does not include any improvements that increase the capacity of the existing plant, since increased capacity is not needed in the planning period even with the higher growth rate. Collection system capacities are also adequate for the planning period, even with the higher growth rate, so no facilities will be oversized if that growth rate is not realized.</p>
<p>Please add a recommendation for scheduled CCTV and cleaning every foot of the collection system periodically. The cycle should be based on the condition of the collection system. The closer the system is to its design life, the shorter the cycle i.e., a relatively new system may be completely cleaned every 5-8 years. An old system may need to be cleaned and CCTV every two to three years. EPA and WEF have references for staffing and scheduling regular O&amp;M on the collection system.</p>	<p>A pipe cleaning and CCTV inspection program has been included as a recommendation. Refer to "Page Specific Comments" for details.</p>

Text from WAC 173-240-050	Explanation	Meets requirements?	Comments:	Response
		Yes/No/NA		
<b>050(1)</b> All general sewer plans required of any governmental agency before providing sewer service are "plans" within the requirements of RCW 90.48.110. Three copies of the proposed general sewer plan and each amendment to it must be submitted to and approved by the department before implementing the plan.	For initial review, please 1 electronic copy. For final review and approval, please submit 1 electronic copy via the Water Quality Portal with a copy of the response to comments matrix. Please submit 2 paper copies to Ecology so we can stamp on to send back for your records.	No	Please submit final report as explained.	Noted
	"General sewer plan" means the:			
	(a) Sewerage general plan adopted by counties under chapter 36.94 RCW; or			
	(b) Comprehensive plan for a system of sewers adopted by sewer districts under chapter 56.08 RCW; or			
	(c) Plan for a system of sewerage adopted by cities under chapter 35.67 RCW; or			
	(d) Comprehensive plan for a system of sewers adopted by water districts under chapter 57.08 RCW; or			

<b>060(2)</b> The general sewer plan must be sufficiently complete so that engineering reports can be developed from it without substantial alterations of concept and basic considerations.	(e) Plan for sewer systems adopted by public utility districts under chapter 54.16 RCW and by port districts under chapter 53.08 RCW.	No	Please include the preliminary engineering and adequate detail to assure technical feasibility and method for distributing cost and expense (include MOA with Old Town as an Appendix).	We believe adequate preliminary engineering and detail has been included in the updates to assure technical feasibility and method for distribution of cost. If any of this information appears to be inadequate, we would appreciate that feedback. The Oldtown (West Bonner W&SD) MOA information is now included.
	(f) "The "general sewer plan" is a comprehensive plan for a system of sewers adopted by a local government entity. The plan includes the items specified in each respective statute. It includes the general location and description of treatment and disposal facilities, trunk and interceptor sewers, pumping stations, monitoring and control facilities, local service areas and a general description of the collection system to serve those areas. The plan also includes preliminary engineering in adequate detail to assure technical feasibility, provides for the method of distributing the cost and expense of the sewer system, and indicates the financial feasibility of plan implementation.			

<p><b>060(3)</b> The general sewer plan shall include the following information together with any other relevant data as requested by the department. To satisfy the requirements of the local government jurisdiction, additional information may be necessary.</p>	-----	-----	-----	-----
(a) The purpose and need for the proposed plan.	Has the service area changed, or community outgrown the existing approved general sewer plan?	No	Is there an existing approved GSP? Has the service area changed?	There is no existing and approved GSP. Collection system figures have been revised per Page Specific Comments to include existing and projected service areas. Refer to Page Specific Comments for description of figure changes.
(b) A discussion of who will own, operate, and maintain the systems.	"Owner" means the state, county, city, town, federal agency, corporation, firm, company, institution, person or persons, or any other entity owning a domestic wastewater facility.	Yes		No change
(c) The existing and proposed service boundaries.	Include all areas within the urban growth boundary.	Yes		No change
(d) The existing and proposed service boundaries.	Please provide a figure that includes the urban growth area (UGA) if one has been identified.	No	Please add both the existing and proposed boundary to Figure 1-1	Existing and proposed boundaries provided. See full response on Page Specific Comments.
			Please reference Figure 1-1 in Section 1.3.3.	Reference has been added.
(i) Boundaries. The boundary lines of the municipality or special district to be sewered, including a vicinity map;		No	Please include maps for sewerage in Old Town.	Old Town sewer map included.

<p>(ii) Existing sewers. The location, size, slope, capacity, direction of flow of all existing trunk sewers, and the boundaries of the areas served by each;</p>		<p>No</p>	<p>Please provide drawings that identify the existing location, size, slope, capacity and direction of flow for the trunk lines. The report indicates that you could not model portions of the system due to a lack of data. Ecology has copies of the plans and specification for the collection system. Please use these to fill in the holes in the data for modeling the system. Please provide flow arrows and slopes for the pipes. Please identify any pipes that do not have adequate scour velocity.</p>	<p>The report now contains an overview figure showing lift stations, manholes, pipes, pipe flow direction, existing sewer boundary, and projected sewer boundary. Section now references an appendix containing a keyed map of the collection system pipes and a table with the attribute information. In this attribute information is the size, slope, and capacity.</p>
---	--	-----------	---	--

(iii) Proposed sewers. The location, size, slope, capacity, direction of flow of all proposed trunk sewers, and the boundaries of the areas to be served by each;		No	Please add the missing slope data to these drawings.	Figures in Section 4 showing capacity improvement projects now include slope data. The other projects are a system expansion that will be designed by developers and held to the standards of Washington Criteria for Sewage Works Design (Orange Book). The alignment of infrastructure for the development is not known at this time; However, topography allows for drainage to one local low point to facilitate the installation of a lift station in conformance with the City's improvements.
(iv) Existing and proposed pump stations and force mains. The location of all existing and proposed pumping stations and force mains, designated to distinguish between those existing and proposed;		yes		No change

(v) Topography and elevations. Topography showing pertinent ground elevations and surface drainage must be included, as well as proposed and existing streets;		No	The report discusses the limitations due to topography but does not provide maps for each area of town both existing and proposed for the sewerage. Provide maps of all areas including proposed that provide this information.	Figure 1-4 presents slope data for all areas of the collection system, existing and projected.
(vi) Streams, lakes, and other bodies of water. The location and direction of flow of major streams, the high and low elevations of water surfaces at sewer outlets, and controlled overflows, if any. All existing and potential discharge locations should be noted; and		No	Provide maps that show these features including the flow directions Include stormwater discharge locations for stormwater sewers. Does Newport have any areas in the collection system that inundated by surface or high groundwater during the wet season.	Added section 3.4 discussing storm drain infrastructure. Section includes a map.
(vii) Water systems. The location of wells or other sources of water supply, water storage reservoirs and treatment plants, and water transmission facilities.		No	The plan includes a map, but the map does not include all of the required information. Please add a map that includes the location of all the features required.	The figure has been revised to now show Newport's wells, reservoirs, and transmission facilities.

<p>(e) The population trend as indicated by available records, and the estimated future population for the stated design period. Briefly describe the method used to determine future population trends and the concurrence of any applicable local or regional planning agencies.</p>		No	<p>Growth rate and projected population is an important parameter. The quantity of the flow is projected using growth rate. Oversizing a collection system and treatment system results in added operations and maintenance costs. It may also result in SSOs due to solids deposition, as a result of inadequate scour velocity.</p>	<p>The assumptions and rationale for a growth rate much higher than the historical have been added to the GSP. The growth in surrounding communities was used as a guide for estimating Newport's future growth. Recent interest in Newport would indicate the community is poised for the growth which neighboring communities have experienced. Even if that growth rate is not recognized in the planning period, it was considered necessary to evaluate system capacities based on that higher growth. The preferred treatment alternative, repair and upgrades of the existing plant, does not include any improvements that increase the capacity of the existing plant, since increased capacity is not needed in the planning period even with the higher growth rate. Collection system capacities are also adequate for the planning period, even with the higher growth rate, so no facilities will be oversized if that growth rate is not realized.</p>
			<p>Please identify the rural communities around Newport with growth rates of 2.5 %. Ecology is not aware of any small communities with a growth rate above 1 percent in the area of Newport. Typically, small communities are getting smaller not larger. Ecology proposes that a growth rate of 1% would be more reasonable. If 2.5% is to be used, please provide the models and the data that are used to project that growth rate.</p>	



(f) Any existing domestic or industrial wastewater facilities within twenty miles of the general plan area and within the same topographical drainage basin containing the general plan area.		No	Table 6.1 states within the study area. This requirement indicates that the facilities within 20 miles in the same topographical drainage (another words watershed). Please provide a map of the watershed identifying all wastewater (domestic and industrial) treatment facilities and show where the outfall is located.	The Idaho Department of Environmental Quality Issued Permits and Water Quality Certifications data base and the Washington Department of Ecology Water Quality Permitting and Reporting Information System (PARIS) were searched for upstream and downstream discharges to the Pend Oreille River. Figure is included in report.
(g) A discussion of any infiltration and inflow problems and a discussion of actions that will alleviate these problems in the future.		Yes but	This is a good discussion but the whole system should be evaluated before you can prioritize the issues for the CIP.	Recommendations still include fixing observed issues during collection system evaluation. CCTV inspection and smoke testing of the entire system is now included as a recommendation. See page specific comments regarding ongoing CCTV inspection.
(h) A statement regarding provisions for treatment and discussion of the adequacy of the treatment.	This is not an engineering report. All treatment discussion must be developed in the engineering plan. Approval of the GSP is not approval of any recommended treatment system changes.	No	Please provide a description of the adequacy of the existing treatment system. This is a standalone GSP so referencing the ER is not adequate.	A table summary of observed conditions for unit process at the treatment plant is now included in Chapter 3. A description of recommended improvements and a project diagram are included.

(i) List of all establishments producing industrial wastewater, the quantity of wastewater and periods of production, and the character of the industrial wastewater insofar as it may affect the sewer system or treatment plant. Consideration must be given to future industrial expansion.		Yes		No change
(j) Discussion of the location of all existing private and public wells, or other sources of water supply, and distribution structures as they are related to both existing and proposed domestic wastewater treatment facilities.		No	Please provide a discussion of the possible impacts of exfiltration on drinking water wells in the vicinity of the collection system.	Discussion provided in Section 1.4.8 along with well head protection areas
(k) Discussion of the various alternatives evaluated, and a determination of the alternative chosen, if applicable.		Yes		No change
(l) A discussion, including a table, that shows the cost per service in terms of both debt service and operation and maintenance costs, of all facilities (existing and proposed) during the planning period.		Yes but	Should the design and administrative costs be based on pretax costs associated with the alternative?	The costs have been reviewed to assure that design and administrative costs are based on pretax dollars. The rate study will include the cost per service in terms of both debt service and operation and maintenance costs of all facilities during the planning period when the preferred alternative is confirmed and the corresponding costs are inserted.

(m) A statement regarding compliance with any adopted water quality management plan under the Federal Water Pollution Control Act as amended.		NA maybe	Is there a well head protection area in Newport?	Yes. Well head protection areas included in Section 1.4.8 with discussion of exfiltration.
(n) A statement regarding compliance with the State Environmental Policy Act (SEPA) and the National Environmental Policy Act (NEPA), if applicable.		No	SEPA must be completed for the GSP, and the determination included with the final submitted GSP.	Noted

## **Responses to Ecology Comments –**

**Resubmittal Date: May 2023**

**Comments Received: September 2023**

**Ecology Comment:**

Newport must indicate in the GSP what standards they will use when reviewing and approving the collection system project designs and construction. Newport must also include design standards they will apply for all collection system projects or extensions. Any project outside the area and projects identified in the GSP will have to be reviewed by Ecology. It is important that Newport provide the design standards for all collection system extensions including pumps and pipes. Without these, all future developments and replacement projects in the collection system must be approved by Ecology which may result in significant delays for projects.

**Comment Response:**

Added the following language to Section 3.2.1

“All collection system improvement projects or extensions shall meet the requirements and guidelines of the WSDOE Criteria for Sewage Works Design (Orange Book), current edition. Additionally, these projects or extensions shall comply with the WSDOT Standard Specifications for Road, Bridge and Municipal Construction, with APWA General Special Provisions and with the WSDOT Standard Plans, current editions. The City of Newport is developing additional ordinances, design criteria and details which will amend or replace portions of the above-referenced standards, but the above-referenced standards will apply until the new requirements are enacted.”