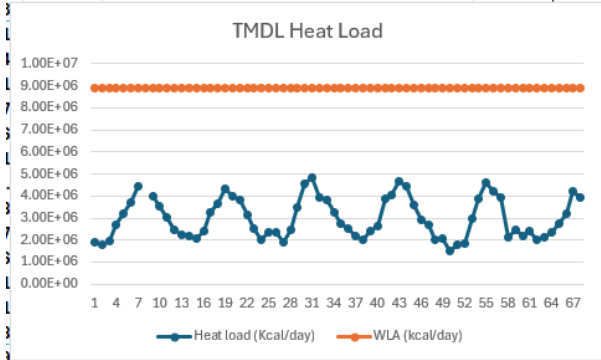


Department of Ecology, Central Regional Office (CRO) Response to Facility Comments	
Facility:	Pateros POTW, WA0020559
Name of Document Reviewed	City of Pateros Response to Facility Review of Draft Permit and Fact Sheet
Date of Review	04/02/2025
Reviewer Name and Title	Lucy (Lucila) Cornejo, Permit Developer/Facility Manager

Draft NPDES Permit Facility Comments and Ecology Responses		
Comment Number	Section Reference/ Page No.	Comment
1	Cover Page/ Treatment Type	Suggest adding "Class 2" in the plant classification line.
<i>Ecology Response</i>		<i>Class type has been added.</i>
2	Table 1 Summary of Submittals/ Pg 4.	New requirements for a S.9 "Spill Control Plan" and S.10 "Outfall Evaluation" in this permit cycle.
<i>Ecology Response</i>		<i>No comment.</i>
3	S1.A. Discharge limits/ Pg 5	<p>Noticed the lat and long numbers changed slightly from last permit. They still point to the POTW – no need to revise.</p> <p>pH - Consider adding the note from the previous permit describing the values to be reported on the DMR's "(c) Indicates the range of permitted values. The permittee must report a Daily Minimum pH, a Daily Maximum pH, as well as Monthly Minimum and Monthly Maximum values. Do not average pH values."</p> <p>Fecal Coliform Bacteria - should be 100 org/100 ml and 200 org/100 ml for a Primary Contact use as described in the Fact Sheet.</p>

Draft NPDES Permit Facility Comments and Ecology Responses		
Comment Number	Section Reference/ Page No.	Comment
		<p>Heat Load in this permit was a surprise. ECY held a meeting on March 17, 2025 to begin implementing EPA's Columbia River Temperature TMDL. A Waste Load Allocation (WLA) was expected after the implementation process was complete and the municipal treatment plants had a chance to discuss implementation with ECY. Engineering studies to determine alternatives and costs are needed before the city can implement a reduction in effluent temperature as population and flows increase as projected in the city 2024 WWFP. Since the effluent temperature WLA is based on permitted flows and existing effluent temperature, there may be a bit of time before the city is impacted by this requirement.</p> <p>An issue to discuss is the long seasonal temperature limit from June through October. At Rocky Reach Dam, water temperature exceeds the 20oC limit about 20 days each year. Reducing the time that effluent needs to be cooled will reduce costs while meeting state water quality standards.</p> <p>It is requested that the effluent Heat Load requirement be removed from this permit cycle to allow the implementation plan to be completed.</p>
Ecology Response		<p><i>pH-footnote from previous permit has been included in the permit draft.</i></p> <p><i>The City of Pateros is required to calculate and report the heat load value assigned by EPA under the Columbia and Lower Snake River Temperature TMDL. This heat load value was not set or calculated by Ecology.</i></p>

Draft NPDES Permit Facility Comments and Ecology Responses		
Comment Number	Section Reference/ Page No.	Comment
		 <p>The table above is the calculated heat load value for the past six years from Jan 2019 to August 2024. The heat load was calculated with the average DMR temperature X DMR monthly average MGD X Constant 3.78e+06.</p> <p>The x-axis represent the months starting from January 2019 to August 2024.</p> <p>WAC 173-220-130 "Effluent limitations, water quality standards and other requirements for permits" stated Fecal coliform levels shall not exceed a monthly geometric mean of 200 organisms per 100 mL with a maximum weekly geometric mean of 400 organisms per 100 mL.</p>
	Mixing Zone/ Pg 6	Noted that new mixing zone dilution factors were calculated for this permit using the CORMIX model. Mixing zone dilution factors were reduced from the previous permit. The reduced dilution factors did not affect effluent existing parameters using the ECY Reasonable Potential spreadsheet as shown in the Fact Sheet. OK as is, no additional comment.
Ecology Response		No comment.

Draft NPDES Permit Facility Comments and Ecology Responses																								
Comment Number	Section Reference/ Page No.	Comment																						
	Table 5 Final Wastewater Effluent., Table 6 Permit Renewal, Table 7 TMDL Heat load (June-Oct)/ Pg 7/8/9	pH - Consider adding the note from the previous permit describing the values to be reported on the DMR's Temperature - daily measurement is ok, continuation of existing permit E. coli sample is a new requirement. The head load calculation is monthly average (max daily) effluent temperature x monthly average flow. This appears to be a reasonable approach and is an example of the on-going implementation process. The city requests that the effluent Heat Load requirement be removed from this permit cycle to allow the implementation plan to be completed.																						
Ecology Response		pH language from previous permit as been included. Please see comment previous heat load comment.																						
	S3.F Reporting Permitting Violations (starts Pg12, 13)	Paragraph between 1. and 2. starting with “the permittee must make reasonable efforts... “. Clumsy to read at this location. Consider adding a number to the paragraph, something like: “2. Sampling ---” and then renumber the rest of the section.																						
Ecology Response		Permit shell language.																						
	Table 8 Design Criteria/ Pg 15	Table 8 is from the 1999 WWFP. The 2001 design plans slightly increased the design flows and loadings. Updated design criteria are: <table><tr><td>Parameter</td><td>Flow (MGD)</td><td>BOD (lbs/d)</td><td>TSS (lbs/d)</td></tr><tr><td>Average Daily</td><td>0.125</td><td>260</td><td>300</td></tr><tr><td>Maximum Daily</td><td>0.180</td><td>395</td><td>540</td></tr><tr><td>Peak Hourly</td><td>0.58</td><td>--</td><td>--</td></tr><tr><td>Max Month (1)</td><td>0.15</td><td>312</td><td>345</td></tr></table>			Parameter	Flow (MGD)	BOD (lbs/d)	TSS (lbs/d)	Average Daily	0.125	260	300	Maximum Daily	0.180	395	540	Peak Hourly	0.58	--	--	Max Month (1)	0.15	312	345
Parameter	Flow (MGD)	BOD (lbs/d)	TSS (lbs/d)																					
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Peak Hourly	0.58	--	--																					
Max Month (1)	0.15	312	345																					

Draft NPDES Permit Facility Comments and Ecology Responses					
Comment Number	Section Reference/ Page No.	Comment			
		(1) A peaking factor of 1.2 from the 2025 WWFP were used to calculate Maximum Month parameters for Flow, BOD and TSS. Please update the design criteria in the Permit and Fact Sheet. It seems appropriate to increase the temperature allocation to match existing permit conditions using the 2001 design criteria.			
Ecology Response		Design criteria has been updated in the Permit and Fact Sheet.			
		The temperature allocation is a value EPA assign under the TMDL to POTW and not calculated by Ecology.			
		(Factsheet) - Table 9- Technology-based mass limits have also been recalculated to reflect the increased design flow and loadings.			
		Parameter	Concentration limit (mg/L)	Influent design load (lbs/day)	Mass limit (lbs/day)
		BOD ₅ Monthly Average	30	260	31.28
		BOD ₅ Weekly Average	45	260	46.91
		TSS Monthly Average	30	300	31.28
		TSS Weekly Average	45	300	46.91
	Certified Operator/ Pg 17	Previous permit stated a Class 2 operator must be in responsible charge but allowed a Class 1 operator to be in charge during regularly scheduled shifts.			
Ecology Response		The language has been included in the permit.			
	S9.A. Spill Control Plan/ Pg 23 & S10	New requirements			

Draft NPDES Permit Facility Comments and Ecology Responses		
Comment Number	Section Reference/ Page No.	Comment
	Outfall Evaluation/ Pg 24	
<i>Ecology Response</i>		<i>No comment.</i>

Draft Fact Sheet Facility Comments and Ecology Responses		
Comment Number	Section Reference/ Page No.	Comment
	Summary- last para/ Pg 1	The 2025 WWFP identifies 5.0 miles of sewer main not the 8.8 shown in the Fact Sheet. Please Revise
Ecology Response		<i>Updated number of miles to 5.0.</i>
	Last para, last sentence Pg 2	Suggest revising “The Columbia River is under an EPA Temperature TMDL” to “EPA has prepared a Columbia River TMDL that ECY is beginning to implement.”
Ecology Response		<i>Suggested revision in the fact sheet has been updated. The sentence now reads: The Columbia River is under an EPA Temperature TMDL that Ecology is beginning to implement.</i>
	Type of Treatment PERMIT STATUS - Issuance date was Feb 26, 2015 -Effective date was April 1, 2015 -Permit Renewal date was March 31, 2019 Pg 6	Blank - Add type of treatment Please revise dates
Ecology Response		<i>Type of treatment has been added “ Class 2, Aeromod, activated sludge”</i> <i>The dates have been revised and updated on the draft factsheet.</i>

	II.A Facility Description/ Pg	1. History – ok consider adding as the last paragraph. “The upgraded facility went online in March of 2001. The upgrades included: 1) Rock trap at the headworks; 2) A mechanically cleaned fine bar screen; 3) New activated sludge aeration basin/clarifiers; 4) New UV disinfection facilities; 5) New sludge dewatering facilities; 6) A new fence around the site; and 7) Various new buildings to house the new equipment. A certified Class II operator is required.”
<i>Ecology Response</i>		<i>Suggested language has been included.</i>
	II.A Facility Description/ Pg 10	<p>2. Collection System Status -</p> <p>1st para -</p> <ul style="list-style-type: none"> - The 2025 WWFP identifies 5.0 miles of sewer main not the 8.8 miles shown in the Fact Sheet. <p>Please Revise</p> <ul style="list-style-type: none"> - Revise the rest of the paragraph to say the 2017 I/I report the average gpd/person at 90 gpcd which is below the EPA threshold of 120 gpcd. (Note to review group – the EPA threshold is based on ADF not the estimated I/I flow of 35 gpcd) - The base year I/I value for 2017 is 0.02 MGD (Note to review group – the calculation is highest month flow (0.062) minus lowest month flow (0.041)) <p>2nd para -</p> <p>OK to keep the paragraph as written, the conclusion is correct and reasonable for the collection system status section.</p> <p>The calculations should use the higher updated flows and loadings from the 2001 design. The higher design criteria will increase the time till the treatment facility is at capacity.</p>
<i>Ecology Response</i>		<p><i>Suggested revision for I/I paragraph has been incorporated.</i></p> <p><i>The calculations have been updated, and new graphs have been included.</i></p>

	II.A Facility Description/ Pg 8/9	<p><i>3. Treatment Process</i> <i>Suggest revising this section to remove all the 1998 inadequacies:</i></p> <p><i>1st para -</i> <i>"Originally the POTW was an oxidation ditch activated sludge facility. The 1998 WWFP by Varela and Associates determined the oxidation ditch facility was not adequate and that the plant needed to be upgraded or replaced. In March 2001 the oxidation ditch was replaced with an Aeromod activated sludge treatment system. The new treatment system included:</i></p> <p><i>1. Rock trap at the headworks</i> <i>2. Mechanically cleaned fine bar screen</i> <i>3 ---continue the list on page 9</i> <i>--add A new lab was constructed a few years after the plant was rebuilt</i></p> <p><i>last para – fill in missing info</i> <i>The City has 2 Class 2 operators</i></p>
<i>Ecology Response</i>		<p><i>Removed all the 1998 inadequacies language.</i></p> <p><i>Included 1st para- suggested language.</i></p> <p><i>Filled in missing information.</i></p>
	II.A Facility Description/ Pg 9/10	<p><i>4. Solid wastes and residual solids</i> <i>3rd sentence – remove duplicate ‘are treated’, replace ‘via’ with ‘with a’</i> <i>57-28 NPDES Draft Permit - Comments (03-27-2025) 6 varela-engr.com 5th sentence</i> <i>replace ‘has met’ with ‘meets’ and remove the last part of the sentence beginning with ‘mechanical separation by auger...’</i></p>
<i>Ecology Response</i>		<p><i>Removed duplicate language.</i></p> <p><i>5th sentence- contains permit shell language</i></p>

	II.A Facility Description/ Pg 10	<p><i>5. Discharge Outfall</i></p> <p><i>1st para – add the following: The 2001 design plans indicate the outfall is a 12-in concrete pipe. The 2025 WWFP includes a recommendation to locate and inspect the outfall.</i></p> <p><i>2nd para 1st sentence – suggest removing the temperature impairment statement – its discussed elsewhere or move the entire paragraph to the next section. Probably can remove or move the third paragraph to the receiving water section.</i></p>
<i>Ecology Response</i>		<p><i>Included the suggested language to the first paragraph.</i></p> <p><i>Removed the 2nd paragraph.</i></p>
	II.B Description of Receiving Water/ Pg 10	<p><i>General comment – revise to incorporate the 2nd and third para from 5. The closest municipal discharge outfall is Brewster at RM 530 (6 miles upstream). Brewster and Bridgeport are closest, but not nearby.</i></p> <p><i>Okanogan River enters the Columbia at about RM 533.5 (almost ten miles upstream) and the Methow enters at about RM 523.9, just downstream of the outfall.</i></p> <p><i>So, third paragraph in 5. Discharge outfall says ambient data is from SR 2 bridge north of Wenatchee and river temp at Chief Joseph Dam. Section II B says ambient data at Columbia River Bridge at Bridgeport and EIM station at the Coulee Dam Bridge. Please clarify what stations were used for the ambient data.</i></p> <p><i>Note that the previous permit used ambient data from “Ecology obtained ambient data from the DART ambient station Columbia River Station located at Wells Dam Forebay. Un-ionized ammonia data from United States Geological Service at Vernita Bridge on the Columbia River.” Why the change?</i></p>

		<p><i>Comment – ambient river data and river temperatures are taken a long way from Pateros and may not accurately represent river conditions near the city. The USGS measures Columbia River water temp at “Wells Powerplant Headwater Near Pateros, WA – 12450650”. The multiple sites used for ambient data is confusing.</i></p> <p><i>Table 2</i> <i>pH is variable (6.7-9.2 s.u.) with a high value. What was used in the reasonable potential calcs? Check table two to see if this is effluent data. If it is for effluent data, reference RP or PWM for why we use the reasonable worst case scenarios (5th, 10th or 95th percentiles).</i></p>
Ecology Response		<p><i>Incorporated “Okanogan River enters the Columbia at about RM 533.5 (almost ten miles upstream) and the Methow enters at about RM 523.9, just downstream of the outfall” to the discharge outfall description.</i></p> <p><i>Thank you for commenting on the ambient data. The USGS station 124380000 Columbia River at Bridgeport, WA, was used for ambient temperature and Ecology Environmental Information Management System (EIM) station 53A070 at The Coulee Dam Bridge 0.5 Miles below Grand Coulee Dam from December 1948 to July 2024 was used for the rest of the ambient parameters. Grand Coulee Dam station was the closes location to Pateros that contained recent data points.</i></p> <p><i>Chronic and Acute values were re-analyzed using the 90th percentile value of 19.1 degrees Celsius from the USGS station 124380000.</i></p> <p><i>It should be noted that no ambient data was used from Wells Dam that language has been removed.</i></p> <p><i>The derivation of effluent limits is typically done by static modeling for conditions existing at the time of critical condition. Critical condition is typically at time of low flow because of the reduced dilution. Table 2 in the factsheet represents Columbia River ambient data. For both ambient and effluent data the 5th percentile was used as the low pH at the chronic</i></p>

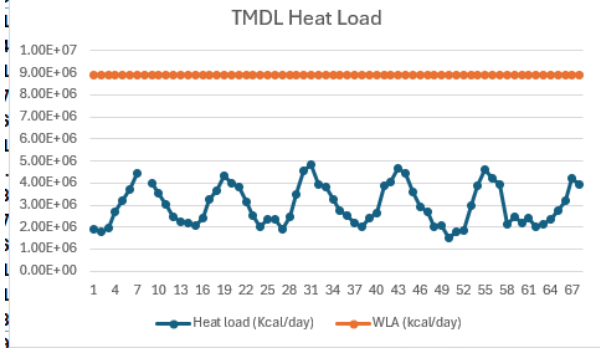
		<i>boundary and the 90th percent was used for the ambient highest pH while the 95th percentile was used for the effluent data at the chronic boundary to calculate the reasonable potential calcs.</i>			
	<i>11.C Wastewater/ Pg 11</i>	<i>1st para, second sentence about including ECY inspection monitoring is not correct – no reported ECY inspection monitoring on the PARIS website.</i>			
<i>Ecology Response</i>		<i>Table 3 values look representative – pH -average value should probably be min value?</i>			
		<i>The second sentence about ECY inspection monitoring has been deleted.</i>			
		<i>pH average has been changed to pH min.</i>			
	<i>II.D Wastewater Effluent/ Pg 2</i>	<i>1st para, second sentence about including ECY inspection monitoring is not correct – no reported ECY inspection monitoring on the PARIS website.</i>			
		<i>Table 4 values look representative.</i>			
<i>Ecology Response</i>		<i>The second sentence about ECY inspection monitoring has been deleted.</i>			
	<i>II.E Summary of Compliance/ Pg 12</i>	<i>1st sentence – remove second ‘effluent limits’</i>			
		<i>2nd para Effective date of permit is April 1, 2015</i>			
<i>Ecology Response</i>		<i>Second effluent limits has been removed.</i>			
		<i>Effective has been replaced for the word issued.</i>			
	<i>III.A Design Criteria/ Pg 14</i>	<i>Revise 1st para to ‘Ecology approved design criteria for this facility’s treatment plant 2001 engineering design plans prepared by Varela and Associates. Please Revise</i>			
		<i>Table 7 is from the 1999 WWFP. The 2001 design plans approved by ECY slightly increased the design flows and loadings. Updated design criteria are:</i>			
		Parameter	Flow (MGD)	BOD (lbs/d)	TSS (lbs/d)
		Average Daily	0.125	260	300
		Maximum Daily	0.180	395	540
		Peak Hourly	0.58	--	--

		Max Month (1)	0.15	312	345
		(1) A peaking factor of 1.2 from the 2025 WWFP were used to calculate Maximum Month parameters for Flow, BOD and TSS.			
Ecology Response		<p><i>Included the sentence "Ecology approved design criteria for this facility's treatment plant 2001 engineering design plans prepared by Varela and Associates" in the first paragraph.</i></p> <p><i>Updated the design criteria.</i></p>			
	III.B Tech based effluent limits/ Pg 14&15	<p><i>Would like to add as the 2nd sentence in Para 1: "These regulations are performance standards that constitute all known, available, and reasonable methods of prevention, control, and treatment (AKART) for domestic wastewater." from the previous permit. It is important to recognize that Washington's technology based standards are defined as AKART.</i></p> <p><i>Table 9 TSS Weekly Average should be 45 not 40. Please revise.</i></p>			
Ecology Response		<p><i>The sentence has been added as the 2nd sentence in paragraph one.</i></p> <p><i>TSS value has been updated to 45.</i></p>			
	5. Mixing Zones/ Pg 17-22	<p><i>Mixing zone narrative looks good.</i></p> <p><i>Table 10 'Critical Conditions; ---</i></p> <ul style="list-style-type: none"> <i>- river depth is listed at 22.68 feet – other documentation indicates the depth is 60 feet.</i> <i>-google earth has a river width of about 1720</i> <i>- max month flow should be 0.15 MGD instead of 0.059</i> <i>-max daily flow should be 0.125 MGD</i> <i>- Effluent Temp 1 DAD Max of 23o C is correct through 2024 DMR's</i> <p><i>Please update the mixing zone calcs and the reasonable potential spreadsheets to include the updated approved effluent flows.</i></p>			

Ecology Response		<p>Thanks for the comment. Below is a list that summarizes Ecology's response to the bulleted comments provided and are as follows:</p> <ul style="list-style-type: none"> - River depth – was calculated using the river width of 1,840 ft X Y ft (representing average ambient river depth) X 1 ft/sec = 41, 738 cfs. The average river depth during critical season was calculated to be 22.684ft. - The river width was obtained using Google Earth Pro measured approximately from the river shore near the POTW straight across horizontally to the adjacent river shore. <p>Ecology does not use facility design criteria when determining mixing zone/ratio analysis. The critical design conditions used are as follows:</p> <ul style="list-style-type: none"> - Flow values used to calculate the Acute mixing zone are obtained from the critical plant effluent flow, for those plants operating at less than 85% of the dry weather design flow during the critical periods, is defined as the highest daily maximum plant effluent flow for the past three years during the critical flow. - Flow values used to calculate the Chronic mixing zone are obtained from the critical plant effluent flow defined as the highest monthly average plant effluent flow for the past three years during the critical flow. - The flow is typically when the least amount of mixing occurs, temperature is the highest, and dissolved oxygen is the lowest.
	III.D Designated Uses/ Pg 22	Table 11 is correct, WAC 173-201A, Table 602 says the Columbian River has a 1 DMax of 20.0 Please add as a footnote.
Ecology Response		1 DMax of 20 has been included.

	Water Quality Impairments/ Pg 23	<p>1st para – The Pateros outfall discharges to an area that is not identified in the 303D list so the statement is true.</p> <p>2nd para – EPA, not Ecology completed the Temperature TMDL.</p> <p>3rd para – may be redundant or unfinished.</p> <p>4th para -</p> <p>1st sentence – suggest ‘published’ instead of ‘established’.</p> <p>2nd sentence – ‘The TMDL includes a waste load allocation for August 13, 2021’ should be revised to say ‘for Pateros’ instead of ‘August 13.’</p> <p>3rd sentence – change Bridgeport to Pateros – change heat load of 3.33E+07 to 8.91E+06 per Table 6-12 of the EPA TMDL. Table 12 is correct.</p> <p>The approved effluent flows should have been increased based on the approved 2001 Design Plans. The heat load for Pateros should be re-calculated.</p>
Ecology Response		<p>1st sentence- established has been removed and published has been included.</p> <p>2nd sentence- changed assigns to includes.</p> <p>Corrected 3rd Sentence to Pateros and changed heat load to 8.91E+06.</p> <p>The permit issued on February 26, 2015 included design criteria that didn’t incorporate the updated design max month daily flows (MMDF) as approved by Ecology. The MMDF that was submitted to the EPA was 0.0983 MGD for Monthly average flow (max. month), 233 lbs/day BOD₅ influence loadings, and 288 lbs/day for TSS influent loading. The (lower snake Columbia TMDL) issued by EPA that includes the (value of MMDF) wouldn’t be able to be changed as that TMDL is set in place by the EPA. As noted above, there is no prediction of an exceedance of the heat load given to the City of Pateros. Additionally, if there was a mechanism to have EPA change the TMDL to include updated design criteria, the heat load would likely result in a more restrictive head load.</p>
	Acute Mixing Zone/ Pg 25	<p>2nd para – sentence looks incorrect. Maybe “ The acute dilution factor below extends downstream for 32.3 feet” ?</p>

		<i>3rd para – consider revising by adding ‘effluent’ before dissolved oxygen, remove ‘deficiency’ and maybe remove ‘temperature’.</i>
<i>Ecology Response</i>		<p><i>3rd sentence has been corrected to Pateros.</i></p> <p><i>2nd para- The sentence has been corrected. It now reads: The horizontal distance of the acute mixing is 32.3 feet.</i></p> <p><i>3rd para- removed deficiency. Ecology ran a reasonable potential analysis on temperature and should have it listed.</i></p>
	<i>Dissolved Oxygen/ Pg 25</i>	<p><i>1st para – last sentence – remove ‘indication of’</i></p> <p><i>2nd para - 1st sentence – remove ‘and’</i></p>
<i>Ecology Response</i>		<i>Removed ‘and’ from 1st sentence in 2nd para.</i>
	<i>Bacteria/ Pg26</i>	<i>1st sentence – is the tech based limit of 400 org/100 ml correct?</i>
<i>Ecology Response</i>		<i>WAC 173-220-130 “Effluent limitations, water quality standards and other requirements for permits” stated Fecal coliform levels shall not exceed a monthly geometric mean of 200 organisms per 100 mL with a maximum weekly geometric mean of 400 organisms per 100 mL.</i>
	<i>III.L Comparison of Effluent Limits / Pg 29/30</i>	<p><i>Table 14 looks ok.</i></p> <p><i>Request that the Temperature Heat Load requirement be removed from this permit.</i></p>
<i>Ecology Response</i>		<i>The City of Pateros is required to calculate and report the heat load value assigned by EPA under the Columbia and Lower Snake River Temperature TMDL. This heat load value was not set or calculated by Ecology.</i>

		 <p>The table above is the calculated heat load value for the past six years from Jan 2019 to August 2024. The heat load was calculated with the average DMR temperature X DMR monthly average MGD X Constant 3.78e+06.</p>
	IV. A. Wastewater monitoring/ Pg 30	<p>1st para – suggest removing ‘for Aeromod ...’. the Permit Writers Manual does not have an Aeromod category for sampling.</p> <p>2nd para – what additional nutrients are you requesting samples for?</p>
Ecology Response		<p>1st para- removed Aeromod.</p> <p>2nd para- language has been removed.</p>
	Other Permit conditions V.B Prevention of Facility overloading/ Pg 30	<p>Last para – looks like the para describing contacting Ecology for funding should be deleted or moved elsewhere.</p>
Ecology Response		<p>Permit shell language.</p>
	V.C. Operation and maintenance/ Pg 32	<p>3rd para about infiltration is outdated and from the 2015 permit. Consider eliminating or revising per the 2025 WWFP.</p> <p>Suggestion for a revision– ‘Pateros POTW has documented infiltration into its collection system. The 2025 WWFP by Varela includes a collection system Capital Improvement Plan</p>

		<i>(CIP). The CIP includes lining sewer mains in the sub-areas identified as having high infiltration.'</i>
<i>Ecology Response</i>		<p><i>3rd para has been modified.</i></p> <p><i>Included the sentence "The 2025 WWFP by Varela includes a collection system Capital Improvement Plan (CIP). The CIP includes lining sewer mains in the sub-areas identified as having high infiltration" to the 3rd para.</i></p>