Appendix 1-1
Comments and Responses on Draft 2014 CWMP
BEFORE THE SPOKANE COUNTY
PLANNING COMMISSION

A RECOMMENDATION TO THE BOARD OF COUNTY
COMMISSIONERS IN THE MATTER OF ADOPTING THE
SPOKANE COUNTY COMPREHENSIVE WASTEWATER
MANAGEMENT PLAN

WHEREAS, pursuant to the provisions of Chapter 36.70 RCW, the Board of County
Commissioners of Spokane County, Washington, hereinafter referred to as the “Board,” has
created a Planning Commission, hereinafter referred to as the “Commission”; and

WHEREAS, pursuant to the provisions of Chapters 36.70 and 36.70A RCW the
Commission may make recommendations concerning the adoption of comprehensive plans and
official controls that implement comprehensive plans; and

WHEREAS, pursuant to the provisions of Chapters 36.70 and 36.70A RCW, the Board
may adopt a comprehensive plan for the unincorporated areas of Spokane County and may
amend the same; and

WHEREAS, Policy CF.7.1 of the Spokane County Comprehensive Plan identifies the
Comprehensive Wastewater Management Plan as a part of the Comprehensive Plan; and

WHEREAS, the Spokane County Utilities Division initiated preparation of the 2014
Comprehensive Wastewater Management Plan (CWMP) and said request is included herein as
Attachment ‘A’; and

WHEREAS, pursuant to the State Environmental Policy Act (SEPA) and WAC 197-11, a
Determination of Nonsignificance (DNS) was issued on February 16, 2015 for the proposed
amendment; and

WHEREAS, after providing at least fifteen (15) days notice, the Commission held a
public hearing on February 26, 2015 to consider the proposed 2014 CWMP for Spokane
County; and

WHEREAS, Commission members present at the February 26, 2015 Commission
hearing included Stephen Pohl, Joyce McNamee, Alene Lindstrand, Stanley Stirling and Mike
Cummings; and

WHEREAS, at the February 26, 2015 public hearing before the Commission no
comments were received in either favor or opposition to the proposed amendment; and

WHEREAS, after considering all public testimony received at the public hearing, as well
as recognizing compliance with State Environmental Policy Act procedures, the Commission
deliberated on the proposed amendment on February 26, 2015; and

WHEREAS, following discussion and deliberation the Commission voted 5-0 to approve
the proposed 2014 CWMP on February 26, 2015; and as included herein as Attachment ‘A’; and

WHEREAS, the Commission finds that the best interests of the public as well as its
health, safety and welfare, will be met by adoption of the Commission’s recommended 2014
CWMP included in Attachment ‘A’;
NOW, THEREFORE, BE IT RESOLVED by the Commission that, in making the hereinabove recommendation, the Commission does hereby enter the following Findings of Fact:

#1 Pursuant to the provisions of RCW Chapter 36.70 and 36.70A, the Commission has the legal authority to recommend changes to the Comprehensive Wastewater Management Plan for Spokane County.

#2 A Legal notice for the public hearing was published in the Legal Notice section of the Spokesman Review on January 23, 2015.

#3 The Commission considered public testimony related to the proposed amendment.

#4 The Commission considered relevant Comprehensive Plan goals and policies.

#5 Pursuant to the State Environmental Policy Act (SEPA) and WAC 197-11, a Determination of Nonsignificance (DNS) was issued on February 16, 2015 for the proposed amendment; and

BE IT FURTHER RESOLVED by the Commission that it hereby recommends to the Board adoption of the proposed 2014 CWMP as included as Attachment ‘A’.

ADOPTED this 1st day of March, 2015

SPokane County Planning Commission

Stephen Pohl, Chair

Stanley Stirling

Alene Lindstrand

Joyce McNamee

Mike Cummings

ABSENT

Pete Rayner

ATTEST: John Pederson, Planning Director
Department of Building and Planning

John Pederson
BEFORE THE COUNTY SERVICES ACT REVIEW COMMITTEE

A RECOMMENDATION TO THE BOARD OF COUNTY COMMISSIONERS IN THE MATTER OF ADOPTING THE 2014 COMPREHENSIVE WASTEWATER MANAGEMENT PLAN AS AN ELEMENT OF SPOKANE COUNTY’S GENERALIZED COMPREHENSIVE PLAN

WHEREAS, pursuant to the provisions of RCW Chapter 36.94.050, a County Services Act Review Committee (CSARC) was formed to review, consider and make a recommendation to the Board of County Commissioners of Spokane County relative to the adoption of the Spokane County 2014 Comprehensive Wastewater Management Plan (CWMP); and

WHEREAS, from time to time, said Generalized Comprehensive Plan and portions thereof, such as the CWMP, may be amended/updated; and

WHEREAS, the County’s wastewater management program has made significant strides since the adoption of the prior (i.e., 2001) version of the CWMP (namely, the elimination of many septic tanks within its service area as part of the Septic Tank Elimination Program, which is substantially complete as of the end of 2014); and

WHEREAS, the 2014 CWMP reflects an update of County sewer planning, policies, and coordination with other County efforts, including evaluation of regional wastewater management considerations; and

WHEREAS, having reviewed the 2014 CWMP, the CSARC believes that the public health and welfare of the residents of Spokane County would be best served by the adoption of the 2014 CWMP.

NOW THEREFORE, BE IT RESOLVED that the CSARC does hereby accept and recommend the adoption of the 2014 CWMP by the Board of County Commissioners of Spokane County.
ADOPTED by the CSARC as of March 11, 2015.

COUNTY SERVICES ACT REVIEW COMMITTEE:

BIJAY ADAMS  
LIBERTY LAKE SEWER AND WATER DISTRICT

DALE ARNOLD  
CITY OF SPOKANE

ERIC GUTH  
CITY OF SPOKANE VALLEY

KELLY WILLIQUETTE  
CITY OF AIRWAY HEIGHTS

TODD ABLEMAN  
CITY OF CHENEY

TODD MIELKE  
SPOKANE COUNTY COMMISSIONER
Spokane County

2014 Comprehensive Wastewater Management Plan (CWMP)

Response to County Services Act Review Committee Comments on October 2014 Draft CWMP

[Note: Responses are in bold text following each comment.]

City of Spokane Comments

1) SECTION 3.2.1. Good explanation of City/County “Agreements”.
   Comment noted.

2) SECTION 5.3.2. City notes that Spokane Humane Society area naturally drains south and is “BETTER” “Engineerably supportable” served by the existing City system south of Francis.
   Comment noted.

3) SECTION 6.2.3 - 6 Year Pump Station Projects North Metro Projects – NST Sewer Service Area (Page 6-7). City notes and supports working with the County in upgrades of the Marion Hay Pump Station so as to accept City flows that can gravity flow to this station.
   Comment noted.

4) SECTION 6.2.5 - 6 Year Wastewater Treatment Facility Projects WWTP – 6.3 – City notes and accepts the County’s explanation and rationale.
   Comment noted.

5) SECTION 6.2.6 - 6 Year Reclamation Projects. City supports “water reclamation” proposed by the County.
   Comment noted.

6) SECTION 6.2.10 – 20 Year Wastewater Treatment Facility Projects “Wastewater Treatment Plant – 20.2 longer…upgrades to RPWRF” City okay with explanation.
   Comment noted.
City of Spokane Valley Comments

1) County will continue to coordinate with the City of Spokane Valley through adjustment to the interlocal agreement, to refine service area boundaries when needed.

Comment noted.

2) County will continue to discourage interim treatment and disposal facilities, which includes on-site septic tank systems.

Comment noted.

3) Flow measurements in the summer of 2012 show that new ERU’s are generating less than 200 gpd. The County should take a closer look at this and evaluate a change to reflect actual numbers and charges per ERU.

Agreed. As noted in Section 9.3 (item 1), the County plans to refine its flow factors within the next six years. The County is in the process of evaluating potential changes to charges per ERU in the context of a rate study.

4) The proposed approach or program to determine system Inflows and Infiltration is appropriate to look at in the next 5 years.

Comment noted.

5) Table 5-2 appears to have mis-spelled “Mirabeau”. It reads “Mirageau”.

Text will be revised per comment.

6) Section 5.3.1, second paragraph, 3rd sentence reads funny. Should it read “will conveys” or “will convey”.

Text will be revised to read “will convey”.

7) Collection System CIP: Section 5, page 5-12 indicates that pipes modeled to exceed 80% maximum depth (d/D) “were identified as having limited capacity” and that “Specific recommended solutions to address each identified capacity limited area are defined in Section 6.” Looking in Section 6, it does not appear to recommend specific solutions to limited capacity areas (for the 20-year condition) in the following locations (Refer to Figures 5-13 and 5-16):

a. Shelley Lake Area collection system

b. Coyote Rock Drive

c. North Sullivan, near Euclid

As discussed in Section 5.4.2 (with respect to specific areas), there are some instances where it is acknowledged that the projected growth (and therefore increase in flows), which is based on broad and conservative (i.e., high) planning assumptions, is unlikely to occur within the 20-year planning horizon. In these locations, specific solutions or projects have not yet been identified. Rather, the County will continue to track development and flows in these areas and revisit the model to determine with more certainty when improvements may be needed. For example, such a statement is made with respect to the Shelley Lake area on Pages 5-14 (bottom paragraph) and 5-15 (top paragraph). A similar statement is made in the second paragraph of Page 5-14 with
respect to the Coyote Rock Drive pipe, which is located downstream of the Grandview Pump Station.

An additional statement will be added to the first paragraph on Page 5-14 to convey a similar approach with regard to the pipe in North Sullivan. This will read as follows: “As the County conducts pre-design analysis regarding the Flora Pit Sewer Extension, the potential future capacity limitations in this pipe will be further analyzed. It is possible that a portion of the flows modeled to be conveyed to this point by the Flora Pit Sewer Extension may instead be routed to the Vercler Pump Station, which would thereby reduce the total future flow in this pipe and alleviate the capacity concern. As such options have yet to be explored in detail by the County, no specific capacity related improvements have been identified at this time for this segment of pipe.”

To further clarify this, the last sentence of the top paragraph on Page 5-13 will be modified to read as follows: “Specific recommended solutions to address each identified capacity limited area are defined in Section 6, with the exception of select areas where localized development (and the related increase in flow) is unlikely to occur at the rate reflected in the broad, system-wide flow projections. As described in the subsections that follow, in such cases the County will continue to track development and flows in these areas and revisit the hydraulic models periodically to determine with more certainty when improvements may be needed.”

8) Proposed CIP Project SM-6.1, Section 6, page 6-2 shows City of Spokane Valley participation with the County. Total project cost is projected to be $1.12M. There is no indication of the cost share for this project. No other project in the proposed CIP is listed as a shared project with another jurisdiction. This evidently is something that the City of Spokane Valley is looking to extend services and has already worked an agreement with the County on?

The County has had preliminary discussions with City of Spokane Valley staff regarding potential cost sharing arrangements. At this time, the project is too early in the conceptual design phase to arrive at the most suitable allocation. The County intends to continue coordinating with the City as the project becomes more well-defined, to determine an allocation that is acceptable to both entities.

9) There are 4 projects in the 6-year CIP and 2 projects in the 20-year CIP identified within the City of Spokane Valley. This equates to about 7.4% of the 6 year program (2014-2019) and about 4.2% of the 20 year program (2020-2033). Most if not all of these projects will help to eliminate existing Septic Tanks and encourage Economic Development (mostly Industrial and Commercial). This seems congruent with the fact that most of the projects over the past 20 years have been completed in the City of Spokane Valley area. With the new County Sewer Treatment Plant online, additional areas to the north that have not been on the Septic Tank Elimination Program because of loads previously going to the Riverside Treatment Facility are now going to the County’s new treatment facility.

Comment noted.

10) Section 7.2.3, Sewer Operation and Maintenance suggests 2001 tracking performance indicators should be more fully implemented. A goal should be suggested that would include a process to making this happen in the next 2 years and a date for implementation in the next 3 years to start tracking measurements to performance that could help optimize the operation.

A timeline-related goal will be added to the implementation steps in Section 9. The last sentence of Section 9.6 (item 2, a) will be modified to read as follows: “As such, the County will further evaluate this previous recommendation and develop an appropriate timeline for implementation of performance indicator tracking”.

3
11) Section 8.2, first paragraph second sentence refers to a program. What program does this refer to, STEP? Also, this sentence reads better with a comma behind 2015.

Yes, STEP is being referred to here. The text will be revised to clarify.

12) Section 8.3.3, first bullet – 900 cubic feet per month = 1 ERU: I believe that this should reflect what the actual numbers are coming in at. Based on 150 to 190 gpd/ERU, this should be closer to 700 cubic feet per month = 1 ERU.

As noted in the response to Comment 3, the County plans to refine its flow factors within the next six years. In addition, “900 cubic feet per month” will be revised to “800 cubic feet per month”, so as to correct a typo.

13) Section 8.3.3, next to the last bullet on page 8-13, delete the extra period at the end of the paragraph.

Text will be revised per comment.

14) Changes to the financial program seem reasonable, however the City of Spokane Valley should remain involved and help review in the County’s next rate study to be performed in the next 2 years.

The Wastewater Policy Advisory Board, of which the City of Spokane Valley is a member, will be convened to review the County’s next rate study.

15) A suggestion to help folks in the Valley remember how much has been done over the recent past: show how much has been expended to date in the different service areas – namely the NVI, SVI, and the NS systems. Show also the % of the area that has been sewered or that was included under the step program – maybe if you have the statistic, show a table, based on area served, the total number of septic tanks, how many have been retired, and total program expenditures in those areas.

The County has a variety of data available in its various databases that could be extracted to provide multiple types of summaries regarding the STEP. However, upon further consideration the County has determined that the “high level”, system-wide summary currently included in Section 1 is sufficient and appropriate for the purposes of the CWMP. Other, more detailed summaries can be developed for other purposes in the future.

Liberty Lake Sewer and Water District and City of Airway Heights Comments

1) The CWMP appears to focus on the County’s service area and immediately adjacent sewer service providers. There is no discussion of other sewer service providers in the County in outlying areas such as; Cheney, Medical Lake, Airway Heights, Deer Park, Rockford, Fairfield, Spangle, etc. Although these sewer systems may not have a direct connection to the Counties system they may have significance when viewing more regional issues such as Spokane River TMDLs, biosolids management, and other issues shared by the providers.

Agreed. The CWMP focuses on the County’s service area, and adjacent areas, because that is the intent/purpose of the document. Section 2.2.3 does identify the other sewer service providers located within the County, and Appendix 2-2 depicts their service area boundaries.

2) The plan recognizes that measured flows per ERU are 14% to 16% lower than the County standard flow base of 200 gpd/ERU. The lower flow base was used in modeling and the higher...
was used in flow projections. In addition two projections (High & Low) were used to evaluate system capacities; high for the collection system and low for the treatment systems. This may be appropriate depending on the County’s objectives for the plan, however, it seems prudent to quantify the impacts to the CIP and improvement cost for taking this approach.

Correct. The calibration process for hydraulic modeling identified that the ERU loading factor that the County uses for planning purposes is higher than what the flow meter data actually showed. As such, the lower flow factors were used with respect to evaluating the current system (because those flows were supported by the meter data). However, for the purpose of analyzing collection system capacity under future conditions, the modeling employed the higher County flow factor. This was done to be consistent with the County’s current planning approach, and to be conservative with respect to pipe sizing for future needed improvements. It is noted in various parts of the CWMP (e.g., Section 9.4) that the hydraulic models will be used periodically to update the findings in the CWMP (including the identified CIP projects and their timing). If future flows are lower than what have been assumed at this time, those future modeling analyses will address such issues and future versions of the CIP will be appropriately modified.

3) I&I projections described in Section 4 of 12.5% for residential and 10% for Commercial/Industrial seem high given the model supports no I&I flow when comparing measured flow to modeled flow.

Meter data showed that there was very little I/I in the system. This was expected because the system is relatively new so things should be “tight”. However, as the system ages it is expected that more I/I will appear. Therefore, the I/I estimates for buildout were based on contributions from all developable parcels and land use. The level of I/I “ramps up” over time between now and buildout, as the system ages. If future monitoring indicates that levels of I/I are increasing as predicted using general planning criteria, the County will implement strategies to address and reduce such I/I levels.

4) The model used different ERU base flows for the different collection system basins. This seems confusing and not useful when extending the model in the future. It seems a better approach might be to use one ERU flow base throughout the model and adjust the number of ERUs within the various basin areas to match calibration results.

The only flow factor that was different was the residential factor for the NVI system (190 gpd/ERU, as opposed to 150 gpd/ERU for the SVI and NSI systems). The NVI area is quite different than the SVI and NSI areas, in that it contains large commercial/industrial parcels, and the flow meter data supported the need for a different flow factor for the area. The County could elect in the future to use a uniform ERU flow factor and vary the number of ERUs for calibration purposes, as suggested in the comment; however, the end result (i.e., total flow for a given area) would remain the same. For the purposes of this CWMP, the County intends to retain its current approach, as it is consistent with how the County has historically conducted its planning efforts. It is also noted that although the different ERU values were used for calibration purposes and to evaluate the existing system, a constant ERU value (200 gpd/ERU) was used in all basins for evaluation of future flows.

5) Page ES-3; It states that the recent modifications to the UGA boundary are currently being appealed. Some explanation should be given if the UGA ends up not being consistent with the BOCC-approved UGA changes. Although some explanation was given on page ES-9 under Capital Improvement Program.

The last sentence of the fourth paragraph on Page ES-3 reads: “Implementation of the 2014 CWMP will be informed by subsequent changes to the UGA per the appeal process described above.” This is similar to the statement on Page ES-9, and seems sufficient to acknowledge that future changes to the UGA (through the appeal process) will result in changes to implementation of the CWMP. The most significant of such impacts is with
respect to the CIP, which is why this is addressed in more detail in that part of the executive summary. Furthermore, the County will amend the CWMP if so required by the Department of Ecology in the event the UGA is modified through the appeal process.

6) Page 6-6; Riverwalk Pump Station Upgrade; It states that this project will be completed in 2014. Is that so? If not does the status need to be changed?

Yes, the Riverwalk Pump Station Upgrade has been completed. No changes to the text are necessary.

**Liberty Lake Sewer and Water District Comments**

1) Grammatical Comments

- Page 1-3; bullet item; “Section 6 outlines the County’s six- and 20- year….”. Change six to 6 for consistency purposes.
- Page 2-3; third sentence needs to be new paragraph beginning with “The County also determined future projections for commercial…."
- Page 2-3; Urban Reserve Areas; Figure 2.1 should be referenced. Perhaps after the last sentence “There are approximately eight URAs in the North Spokane area…."
- Page 3-1; end of second paragraph under Treatment Facilities; The format of the sentence “The City must report the average number of discharge…” is cut and needs to be joined.
- Page 3-5; The capacity of the LLSWD’s treatment plant is 2.0 mgd average day max month. Please change from 1.8 to 2.0.
- Page 4-5; Second sentence; There is an extra space between “F or” in the sentence “For planning purposed it is assumed that…."
- Page 4-8; Table 4-6; NVI System should be centered to be consistent with SVI System and NSI System.
- Page 4-12; First paragraph; There is an extra space between “T o” in the sentence “To evaluation the sensitivity of the calculations and establish…."
- Page 5-12; First sentence under Urban Growth Area Update Areas of Interest; The date July 18th 2013 should have a “,” and remove the “th”.

Text will be revised to reflect above grammatical comments.

**City of Airway Heights Comments**

1) The West Plains/Thorpe UGA/JPA, located to the southwest of the City of Airway Heights is not shown in either the City of Airway Heights or City of Spokane service area.

The County requests input from both cities regarding the most appropriate way to depict sewer service area jurisdiction in this area in CWMP mapping.
Spokane County

2014 Comprehensive Wastewater Management Plan (CWMP)

Response to Washington State Department of Ecology Comments on October 2014 Draft CWMP

[Note: Responses are in bold text following each comment.]

Executive Summary:

1) Page ES-6: The summary details an average flow of 8.6 MGD for the county's treatment plant. Please revise to reflect actual design flows (8.6 MGD is the permitted maximum month flow) as future plan references are not consistent. In addition, please define a flow threshold for a "wet" industry as described in the wastewater flow projection.

As clarification, and as noted in the first paragraph on Page ES-6, the value of 8.6 mgd depicted here relates to the total volume of wastewater received by the County's "system", not its treatment facility. In other words, the 8.6 mgd is referring to the total flow accommodated by the County's collection/conveyance system, a portion of which is treated at the City of Spokane's RPWRF. Thus, no revisions are needed regarding this item.

The potential future additional flows that could be associated with "wet" industries are discussed in detail on Page 4-8 (last paragraph). We have not defined a specific threshold of sewer flow generation that relates to "wet" industries. Rather, we have included a value (1.0 mgd) that could represent one or multiple "wet" industries. Given this, and the desire to maintain brevity in the Executive Summary, we do not intend to provide detailed definition of "wet" industries at this location in the document, as it is covered in Section 4.

2) Page ES-8: As a general note, Ecology has concerns with the future expansion of the County's wastewater treatment plant. Prior to planning for expansion, the County will need to work closely with the Permit Manager, as an expanded facility will undergo a Public Notice process during the application period if discharging to the 303(d) listed Spokane River.

The County will consult with Ecology's Permit Manager prior to facility expansion planning. We look forward to meeting with you in the near future to begin that discussion.

3) Page ES-8: Please revise references (throughout the document) to future plans for meeting Ecology's 85 percent design triggers for flow and other design parameters. The County submitted a plan for maintaining adequate capacity in February of 2014. In addition, the County will submit a revised design capacity prior to or in conjunction with the 2016 Permit Renewal Application.

The County periodically submits documentation to Ecology evaluating the current operations of the SCRWRF in relation to its 85% design triggers for flow and other design parameters. As you know, Spokane County’s NPDES permit acknowledges both the 8 mgd of capacity at the SCRWRF, plus another 10 mgd of capacity at the RPWRF. Additionally, Spokane County submits an annual “Wasteload Assessment Report and Plan for Maintaining Adequate Capacity” for the SCRWRF. Furthermore, we plan to submit supporting documentation in the County’s Permit Renewal Application. Through such planning efforts and documentation, the County maintains ongoing communication with Ecology regarding its future capacity needs.
4) Page ES-9: Please include a reference to the addition of the Mead-Mt. Spokane area to the UGA currently under appeal in the Capital Improvement Program Summary (CIP). In general, Ecology will require an amendment to this plan if it becomes final prior to the Board's decision regarding the appeal. Related to the CIP process, all changes/uploads to the 6-year and 20-year planning horizons in the three year review need to be submitted as an amendment to the document on file at Ecology.

There are portions of the UGA other than the Mead-Mt Spokane area that may also be modified through the appeal process. Therefore, we do not see a need to call that area out specifically, particularly in the Executive Summary.

To clarify the potential need for an amendment to the CWMP, the following sentence will be included at the end of the 2nd paragraph in the CIP section on Page ES-9: “Changes or updates to this CWMP that result from UGA modifications through the appeal process will likely require an amendment to the CWMP.”

Introduction:

1) Page 1-1: Please specifically reference the Extended Payment Grant received by the County to provide the financial assistance for construction of the collection system.

The following text will be added as a new paragraph, between paragraphs 6 and 7 on Page 1-2: “Construction of the County’s sewer collection system was funded in part by the Washington State Department of Ecology’s Centennial Clean Water Fund Grant No. G9600356. This extended payment grant provided approximately $75 million in sewer construction funding between 1995 and 2014.”

2) Page 1-6: The submitted document does not include a SEPA checklist as referenced in this section. Please revise and include the completed checklist. In addition, Ecology recognizes the planning process for the CIP constitutes a “non-project” action; however, an environmental review must be completed for the specific projects listed in the 6-year improvement plan. It would be possible for the County to submit one checklist that covers the entire UGA to satisfy this requirement.

The SEPA checklist has been completed and will be included as Appendix 1-2 in the next iteration of the document. It is acknowledged that additional environmental review will be required for specific projects listed in the CIP. Such reviews will take place in the context of the implementation of each individual project, or combinations of projects when applicable.

Planning Criteria:

1) Page 2-3: The areas mentioned in the Urban Reserve Areas reference parcels in both North Spokane and in the Spokane Valley. Please provide information on financing the sewer extension to these areas. Will subsidies be provided to developers or will the responsibility of the connection to the adjacent sewer service fall on the homeowner?

In most cases, extension of sewer service to these areas will be the responsibility of developers and homeowners. The County does not have a funding mechanism for sewer infrastructure extensions, outside of those that are designated as “general facilities”.

2) Page 2-5: Please clarify that the County’s wastewater treatment plant produces effluent that meets Class A reclaimed water standards but does not currently discharge with a reclaimed water permit. Rather, the facility has a traditional National Pollutant Discharge Elimination Permit.
The following text modifications will be made to the first paragraph of Section 2.3.2: “..., which currently produces effluent that meets Class A reclaimed water standards. The facility is operated in accordance with a National Pollutant Discharge Elimination System permit. Effluent is currently discharged to the Spokane River at River Mile 78.68; however, in the future, water from this facility meeting Class A reclaimed water standards may also be used for beneficial reuse, with the potential to provide water for local industrial processes, urban irrigation, recharging wetlands, etc.”

3) Page 2-5: Please include the approximate river mile at the location of the County's outfall near the Spokane Community College.

The River Mile location has been included in the text, as noted in the above response.

Regional Wastewater Management Considerations:

1) Page 3-2: Please revise the current capacity of the SCR WRF to match the permitted flows (AAD: 8 MGD, Max. Month Avg: 8.6 MGD). This also applies to page 4-14.

The text will be modified in Section 3.1.2 as follows: “The SCR WRF currently has a capacity of 8.0 mgd on an average daily basis (8.5 mgd on a maximum month design flow basis), but is expandable up to approximately 24 mgd (on an average daily basis).” Note that the permitted maximum month design flow is 8.5 mgd, not 8.6 mgd as stated in the comment.

2) Page 3-2: Please provide average flows at both the Peone Pines and the Latah Creek wastewater treatment plants.

The average flows in 2014 for these two facilities were: 14,600 gpd for Peone Pines, and 40,360 gpd for Latah Creek. Table 3-1 will be edited to include this information.

3) Page 3-5: Please revise the permitted capacity of the Liberty Lake Sewer and Water District's treatment plant to 2.0 MGD, annual average flow.

That sentence will be revised as follows: “…which has a capacity of 2.0 mgd (annual average flow).”

Wastewater Flow Projections:

1) Page 4-1: Please include the ERU use that applies to the low flow projection in addition to the 200gpd/ERU.

This information is provided later in Section 4.3.5 (see Page 4-12, last paragraph), in the context of all the variables/assumptions that were modified to generate the low flow projection. It seems logical to retain discussion of this item at this point in the text, rather than introducing it earlier.

2) Page 4-5: Table 4-4’s footnote for growth in 2012/2013 shows a stagnant ERU due to minimal growth in the county in 2013 and a mid-year count for 2013. Does the County have actual growth data for 2014? If so, please update with actual data. In addition, what factors did the County use to extrapolate the 1.3 percent compounding growth rate for the SCR WRF service area from the county-wide data?

Because the majority of the CWMP analysis was conducted in early 2014, 2013 data represented the last full year of data that was available for evaluation. We intend to keep with this approach, as modifying the tables and analyses at this point to incorporate 2014
data would require more extensive editing than just Table 4-4. Subsequent County updates and other planning efforts will of course utilize 2014 (and later) data. However, for the purpose of this response document, it can be stated that as of December 31, 2014, the total ERU count served by the County system is approximately 52,800, representing an increase of roughly 1,500 ERUs since 2013. It should be noted that this increase represents additional ERUs associated with growth (as is projected in Table 4-4), as well as existing ERUs that have been recently connected through the STEP and other County enforcement actions (as is described in Section 4.3.2 and Table 4-5).

The County did not use any factors or adjustments to extrapolate the county-wide projected growth rate of 1.3% to its service area. It is assumed that the County's entire service area (not just the SCRWRF service area) will grow at a rate comparable to the County as a whole (i.e., at 1.3%).

3) Page 4-7/Table 4-11: Please provide additional information regarding the development of the Kaiser Aluminum property. In addition, statements regarding flow from the property conflict between this section and the footnote to Table 4-11. Please revisit and confirm the statement that flow will be sent to the county at 100 percent build out as the table footnote indicates that no flow contributes to the total build out flow projection.

There is no conflict between the discussion on Page 4-7 and the footnotes to Table 4-11. The discussion on Page 4-7 relates to the “high” end of the flow projection range, as do all portions of Section 4 prior to Section 4.3.5. In order to be conservative (i.e., “high”), the buildout timeframe in the “high” projection assumes that future flows originating from the Kaiser Aluminum property may need to be accommodated by the County. By contrast, the “low” end of the flow projection assumes that flows from this property will continue to be managed by the treatment facility located at that property. The table footnote is specifically in reference to the “low” projection, for the point of contrast against the “high” projection.

Wastewater Collection System Analysis:

1) Please revise figures for the existing sewer collection system to show diameter of the trunk lines (can color code as necessary).

Figures 5-1 and 5-2 do indicate the diameters (and slopes) of existing trunk sewers. However, we note that there were no footnotes on these figures to define/describe what the diameter and slope values represent. Such notes do exist on later figures, beginning with Figure 5-10 (i.e., the note box to the left of the legend box). That note box will now be placed on Figures 5-1 and 5-2, and removed from the later figures, as that information is not depicted in those figures. The later figures do not contain the diameter/slope information, as the figures would become cluttered and unreadable with that additional information.

2) Page 5-9: Please provide an explanation of why the model calibration for the locations that did not fall within the calibration guidelines.

For the locations that did not fall within the calibration guidelines for peak flow that are not already discussed in the text (i.e., NVI-01A, NVI-01B, NVI Pump Station, SVI-04 and NSI-02), model-predicted flows were higher than measured flows. Such results were deemed acceptable for the purposes of the analysis conducted for the CWMP, because the model is intended to be on the conservative side. Meaning, if the model produces results a little higher than the guidelines allow in a few locations, that is considered acceptable, so long as overall the model produced results within the guidelines.
3) Page 5-14: Please indicate the size of the collection system in the areas where the pipes become capacity limited in and around the Shelley Lake Area. Please indicate if the County can retrofit the existing Grandview Pump Station with larger pumps if future capacity exceeds design criteria.

The pipes in the Shelley Lake area are generally 10” in diameter, with a few that 8” in diameter.

As noted in the 2nd paragraph on Page 5-14, the Grandview Pump Station was constructed to allow for future upsizing if needed.

4) Page 5-14: Ecology has concerns with the lack of capacity in the pump stations and collection system within the North Spokane Interceptor. Please add a brief discussion estimating the time period in which upsizing these components will be necessary.

While the model indicates potential capacity limitations occurring in the NSI system within the 20-year time horizon, the County does not expect such issues to arise until well beyond the current 6-year time horizon. Because of this, and the fact that the Marion Hay and Whitworth Pump Stations were constructed to allow for future upsizing (therefore meaning improvements and upsizing are not anticipated to be overly complicated), the County will continue to monitor flow increases and pump station performance, so as to identify specific upgrade projects at a later time when more definition can be made regarding such improvements.

Capital Improvement Program:

1) Please include a discussion regarding financing of the capital improvements projects over the planning period if costs exceed revenue for the Utility. In this discussion include, as necessary, debt service and O&M costs of all the facilities in the planning period. A present value, if possible, should also be included.

The Spokane County Division of Utilities updates its financial planning for the sewer utility on a regular basis, through a review of rates every 2-3 years. This is done to ensure that financial obligations are met through an appropriate rate structure. The most recent rate study was completed in 2011. The County is currently conducting a rate study, with the assistance of a consultant, to review wastewater treatment plant charges. The current effort includes developing a multi-year financial plan, evaluating the utility’s capital program, completing a cost-of-service analysis to allocate costs to each customer class based on the proportional use of the system, and to modify the design of rates and charges to capture the required revenue stream.

2) For capital costs that will be shared between entities, please provide an approximate percentage breakdown of the financial responsibility.

Financial responsibility breakdowns have not yet been determined for projects that may involve potential future cost sharing. Further planning and discussions with the other entities are required before cost allocations can be arrived at. In addition, the approach has been modified with respect to one project that had been identified as being jointly funded. Project SM-6.1 is now anticipated to be funded and constructed by the City of Spokane Valley (CSV) in conjunction with a road resurfacing project. CSV will be reimbursed for the cost of sewer construction through either a late comer agreement with Spokane County or developer agreements independent of the County.
3) Please provide an estimated percentage of the 2014 CIP projects that the County has already completed.

Three of the projects shown in the six-year CIP to be implemented in 2014 have been completed. The remainder has been moved to 2015. Table 6-1 will be modified accordingly, and will now reflect the six-year period as being 2015-2020.

4) Page 6-9: Please indicate if the County still proposes to work with FEMA to re-delineate the floodplains and floodways in the Saltese Flats area prior to wetland restoration.

Yes, the County is currently engaged in a collaborative effort with the City of Spokane Valley and a consultant to better delineate the 100-year floodplain in the Saltese Flats area.

5) Page 6-13: Internal communications at Ecology confirm that the stream bank near the Latah Creek WWTP will need stabilization in advance of the 20-year planning period. Please indicate why this will not be part of the 6-year CIP plan.

A project that would adequately stabilize the streambed in the vicinity of the County’s Latah Creek treatment facility would require project limits that extend considerably upstream and downstream of the County-owned water frontage. This would involve the participation of several jurisdictions and private property owners. Spokane County does not view the project as being solely a County Project, but rather a project that may include its participation in the future. The County has not defined a specific timeline for the project, but will coordinate on a schedule that involves interfacing with the other parties.

General Comments:

1) Please provide a list of significant industrial users as an appendix. Include quantities of wastewater and periods of production.

The following information will be added at the end of the “Industrial Pretreatment Program” in Section 7.2.4, in Page 7-5:

“The names of the industrial customers that currently have wastewater discharge permits under the County’s industrial pretreatment program, and their typical wastewater flow rates, are listed below:”

<table>
<thead>
<tr>
<th>Name</th>
<th>Average Monthly Wastewater Flow Rates (gallons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>American On-Site Services</td>
<td>48,415</td>
</tr>
<tr>
<td>Galaxy Compound Semiconductors, Inc</td>
<td>8,122</td>
</tr>
<tr>
<td>Honeywell Electronic Materials Inc</td>
<td>3,137,300</td>
</tr>
<tr>
<td>Kemira Water Solutions, Inc</td>
<td>15,405</td>
</tr>
<tr>
<td>Lloyd Industries Inc</td>
<td>26,332</td>
</tr>
<tr>
<td>Mica Landfill</td>
<td>401,245</td>
</tr>
<tr>
<td>Novation Inc.</td>
<td>51,552</td>
</tr>
</tbody>
</table>

2) Ecology supports the development of an I/I program within the next 5 years.

Comment noted.