



# Spokane International Airport

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February 18, 2026

**Transmitted via email**

Jeremy Schmidt, PE, Site Manager, Toxics Cleanup Program  
Department of Ecology  
4601 N. Monroe Street  
Spokane, WA 99205

RE: Request for Extension pursuant to  
Enforcement Order DE 22584 (“EO”)

Dear Jeremy:

The Spokane Airport Board (“Airport”) requests a 30-day extension to respond to the Short-Term Interim Action Workplan (“STIAWP”), from the Department of Ecology (“Ecology”) that is currently due by February 24, 2026. We understand that Ecology has worked with the City of Spokane (“City”) and Spokane County (“County”) regarding an extension of their STIAWP submission(s) in connection with their respective Agreed Order DE 24355 (“AO”), and the Airport has reviewed the City’s and County’s joint request for such an extension. The Airport shares the same concerns and needs for an extension of the STIAWP, and add the following:

1. The Airport believes that rushing to respond to the STIAWP under the current deadline will not benefit the Airport, Ecology, the City or County, or the public. Ecology recognizes that the Airport’s consultant, GSI Environmental Inc. (“GSI”), is widely respected and top rated, and has delivered superior work throughout the ongoing EO and Scope of Work processes. GSI and the Airport have been actively working under the EO Scope of Work, with recent developments consisting of the following:

- The Airport submitted its final Quarterly Groundwater Monitoring Sampling and Analysis Plan and Quality Assurance Project Plan (SAP/QAPP) to Ecology on January 6, 2026. GSI conducted the first quarterly groundwater monitoring event on behalf of the Airport from January 26-29, 2026. The reporting of laboratory analytical data is still in progress and work is underway to meet the required reporting deadline.
- The Airport submitted the Draft Initial PFAS Investigation (IPI) Report on January 15, 2026, and received comments from Ecology on February 11, 2026. The Airport and GSI are reviewing Ecology’s comments, with formulation of a response to the comments in progress for timely submittal to Ecology.

In addition to the current performance of the EO Scope of Work, the Airport has directed GSI to provide a general framework and assemble the technical materials required to support the issues associated with the STIAWP, including analyzing the data Ecology provided to the City, County and Airport on February 12, 2026. The Airport notes and recognizes that much of the data provided by Ecology are also responsive to the Airport’s public records request but similar Ecology (Public



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Records Request: P020708-062824) on June 28, 2024.<sup>1</sup> The Airport is pleased to finally receive data relevant to developing the STIAWP, but similar to what the City and County have communicated to Ecology, the Airport needs time to review and understand that information.

2. The Airport reminds Ecology that the Airport is also subject to federal law mandates, including the Federal Aviation Administration (“FAA”) Airport Compliance Manual Order 5190.6B, 14 C.F.R. Part 139, and the FAA Airport Sponsor Grant Assurances pursuant to 49 U.S.C. § 47107 (copies of a few of these communications are attached hereto and incorporated herein by this reference) that impose federal restrictions on how the Airport can use of its revenue and may restrict the Airport’s options in this matter. To date, the Airport believes it has been able to comply with the federal law obligations and the EO Scope of Work based on the expenditure of Airport revenue for tasks on Airport property. However, the interim action demands the Airport to use airport revenue for expenditures off Airport property, which may require detailed analyses by both the Airport and potentially the FAA to confirm that the Airport’s expenditures are consistent with federal law. We have begun an evaluation of Ecology’s demands regarding draft interim actions it communicated at a technical meeting on February 6, 2026. However, additional time is necessary to evaluate and determine whether the Airport can satisfy the interim actions ordered by Ecology and at the same time comply with federal law.

3. Ecology also has expressed its desire for a single work plan from the Airport, City, and County. To the extent reasonably possible, the City and County have communicated a need for “meaningful coordination and alignment” by and among the PLPs to “facilitate more efficient review by Ecology.” Granting the City and County an extension, but not the Airport, would complicate and make nearly impossible for the three PLPs to consider a single plan.

4. Like the City and County, in addition to the information provided by Ecology on February 12, 2026, the Airport understands that “Ecology has a great deal of information that it is willing to share about the homes where testing has already occurred, where alternative drinking water has already been provided, and other helpful details that will assist in drafting the STIAWP.” After receiving additional information from Ecology, the Airport will need more time to analyze that information.

5. The Airport joins the request by the City and County, to “schedule meetings with Ecology about the technical basis for the interim action, including the background information and data from Ecology described in number four above.”

As noted by the City and County, “no immediate health-protective measures are being delayed by this request” to extend the time to respond to Ecology’s emergency interim action order and “[t]here are no related deadlines or schedules that would be affected if the extension is granted.”

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<sup>1</sup> This was a welcome development because on February 9, 2026 Ecology informed the Airport that, “Due to short staffing and large volume of requests, this is to notify you that the Eastern Regional Office requires additional time to provide you their records responsive to your request, which were originally scheduled to be provided to you February 9, 2026. We anticipate that the records will be provided to you on March 9, 2026.”



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Thank you for your consideration.

Sincerely,

Lisa Corcoran  
Chief Development Officer

**cc via email:** Spokane International Airport  
Kyle Twohig, Senior Director of Public Works, Spokane County  
Marlene Feist, Public Works Director, City of Spokane  
Ivy Anderson, Assistant Attorney General, Department of Ecology