



# **Response to Comments**

## **Agreed Order and Public Participation Plan for Spokane International Airport PFAS**

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**Public comment period held Feb. 6 – Mar. 9, 2026**

**Facility Site ID: 6332493, Cleanup Site ID: 16774**

### **Toxics Cleanup Program**

Washington Department of Ecology  
Spokane, Washington

March 2026

## Document Information

This document is available on the Washington Department of Ecology's [Spokane International Airport PFAS cleanup site page](#).<sup>1</sup>

### Related Information

- Facility site ID: 6332493
- Cleanup site ID: 16774

## Contact Information

### [Toxics Cleanup Program](#)<sup>2</sup>

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<sup>1</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/16774>

<sup>2</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-sites>

# Toxics Cleanup in Washington State

Accidental spills of dangerous materials and past business practices have contaminated land and water throughout the state. The Washington Department of Ecology (Ecology) Toxics Cleanup Program (TCP) works to remedy these situations through cleanup actions. TCP cleanup actions range from simple projects requiring removal of a few cubic yards of contaminated soil to large, complex projects requiring engineered solutions.

Contaminated sites in Washington are cleaned up under the [Model Toxics Control Act](#)<sup>3</sup> (MTCA, Chapter 173-340 Washington Administrative Code [WAC]), a citizen-mandated law passed in 1989. This law sets standards to ensure toxics cleanup protects human health and the environment and includes opportunities for public input.

## Public Comment Period Summary

Ecology held a comment period February 6 through March 9, 2026, for the [Agreed Order](#)<sup>4</sup> (AO) with the City of Spokane and Spokane County and updated [Public Participation Plan](#)<sup>5</sup> for the Spokane International Airport (SIA) PFAS cleanup site. We held a public meeting February 25 ([download the slides](#)<sup>6</sup>) that was attended by more than 90 people. We presented the content of the AO, provided an update on the investigation, and shared information about requiring the responsible parties (SIA, the City of Spokane, and Spokane County) to provide safe water (interim cleanup actions). We appreciated the thoughtful questions and comments from attendees and were pleased to see many new faces. **Please join our [West Plains PFAS updates email list](#)<sup>7</sup> to receive regular updates about this issue.**

The AO requires the city and county to complete a remedial investigation, feasibility study, and potential interim actions, which can occur at any time during the cleanup process. The investigation will determine the full extent of per- and polyfluoroalkyl substances (PFAS) and other contamination in soil and groundwater, and the feasibility study will evaluate cleanup options. The order includes a scope of work and schedule for completing the investigation and study, excluding any work SIA will do or has already done. Interim actions could include cleaning up areas of high concern and will include providing safe drinking water to private wells with PFAS above drinking water standards in the [interim action area](#).<sup>8</sup> The Public Participation Plan describes how you can be involved during the cleanup process. Because SIA is already in

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<sup>3</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Rules-directing-our-cleanup-work/Model-Toxics-Control-Act>

<sup>4</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/166446>

<sup>5</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/138781>

<sup>6</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/167678>

<sup>7</sup> <https://go.ecology.wa.gov/WestPlainsPFASupdates>

<sup>8</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/image/4686>

progress on the work, it continued during the public comment period. More information is available in the [public notice](#)<sup>9</sup> we mailed to the surrounding community.

Ecology appreciates the 27 comments we received. We address them in the Response to Comments section that begins on page 5. We updated the Public Participation Plan to remove the HUB as a potential meeting location because of your comments. We post this document on our SIA PFAS webpage, send the document to people who submitted comments, email the [West Plains PFAS updates email list](#), and share it with the responsible parties so they may also consider your comments.

## Site Background

Ecology issued SIA the 2024 Enforcement Order after receiving sample results that found PFAS in groundwater at the airport. We negotiated an agreed order with SIA for 150 days, which included granting them two extensions. They did not sign it by the deadline, so we issued the Enforcement Order.

## Investigation progress

SIA completed the [Site Assessment Report for PFAS](#)<sup>10</sup> in August 2024. The report overviews the site, includes a records review, and lists areas that could be PFAS sources where firefighting foam was stored or used, and areas where PFAS was previously found in groundwater.

Next, SIA completed an [Initial PFAS Investigation Work Plan](#)<sup>11</sup> in December 2024. The plan detailed where and how preliminary groundwater and soil samples would be collected on SIA's property, focusing on areas with potential or known PFAS releases. Groundwater samples were collected from 50 monitoring wells. Soil samples were collected from 57 locations at multiple depths below the ground surface. This field work was completed in January 2025, and Ecology received the draft Initial PFAS Investigation Report in January 2026. We will post it on our [SIA PFAS webpage](#)<sup>12</sup> when it's final and email the West Plains PFAS updates email list.

In August 2025, we named the city and county as parties responsible for cleanup because the airport is jointly owned by the two local governments. The city, county, and SIA are responsible for investigation and cleanup costs. We negotiated the Agreed Order in late 2025 and signed it in January 2026.

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<sup>9</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/167044>

<sup>10</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/145583>

<sup>11</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/149715>

<sup>12</sup> <https://go.ecology.wa.gov/SIA-PFAS>

## Requirement to provide safe water

On February 10, 2026, we notified SIA, the city, and county they need to provide safe drinking water to residents and businesses with PFAS-contaminated wells in the affected area north and east of the airport ([interim action area](#)<sup>13</sup>). We provided the responsible parties a [scope of work and schedule](#)<sup>14</sup> for providing:

- Bottled water and/or point-of use (POU) filtration systems (short-term interim action)
- Private well testing and treatment system maintenance
- Point-of-entry treatment (POET) systems or connection to city water where possible (long-term interim action)

## Response to Comments

The comment letters are printed verbatim. Contact information (postal and email addresses and phone numbers) has been omitted. Ecology's responses follow the comments. The letters are in alphabetical order based on the commenter's last name, except when similar comments have been grouped by topic and provided one response (see notes under Table 1).

### Index of comments received

Everyone who submitted comments is listed in Table 1 in alphabetical order by their last name, or "anonymous" when no submitter name was provided, followed by the date we received their comments and the page on which their comments are printed as received.

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<sup>13</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/image/4686>

<sup>14</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/167075>

Table 1. Index of comments received

| <b>Name</b>                                          | <b>Organization</b>                                  | <b>Date received</b>   | <b>Page</b> |
|------------------------------------------------------|------------------------------------------------------|------------------------|-------------|
| Anonymous                                            | People for an Abundant and Smarter MTCA              | March 8                | 5           |
| Anonymous                                            | None                                                 | March 2                | 12          |
| Anonymous                                            | None                                                 | March 9                | 13          |
| Mary Benham                                          | None                                                 | March 8                | 14          |
| Crystal A. Bingham                                   | None                                                 | March 3                | 15          |
| Jennifer Ekstrom on behalf of Russ and Joann Ekstrom | None                                                 | March 8                | 16          |
| Renata and Michael Gruber*                           | None                                                 | February 28            | 17          |
| Charles Gruenenfelder                                | None                                                 | March 9                | 19          |
| John Hancock                                         | None                                                 | March 9                | 21          |
| John Hancock                                         | West Plains Water Coalition President                | March 9                | 24          |
| David Jones                                          | None                                                 | February 28            | 24          |
| Kimra Kiddwiggins**                                  | None                                                 | February 19<br>March 7 | 25          |
| Rachel Lander**                                      | None                                                 | February 27            | 25          |
| Caj Matheson                                         | Coeur d'Alene Tribe<br>Director of Natural Resources | March 9                | 26          |
| Douglas McBride                                      | None                                                 | March 9                | 27          |
| JE McHugh                                            | None                                                 | March 2                | 29          |
| Gail Oneal*                                          | None                                                 | March 5                | 17          |
| John Oswald***                                       | None                                                 | February 20            | 31          |
| Linda Reynolds***                                    | None                                                 | February 27            | 31          |
| Donna Robins*                                        | None                                                 | March 5                | 17          |
| Nick Scharff                                         | None                                                 | March 4                | 31          |
| Katelynn Scott                                       | Spokane Riverkeeper                                  | March 9                | 33          |
| Albert Tripp                                         | City of Airway Heights<br>City Manager               | March 9                | 35          |
| Scott Walker*                                        | None                                                 | February 28            | 17          |
| Lisa Wren*                                           | None                                                 | February 26            | 17          |

\* These comments are about the boundary of the interim action area, so they have been grouped under Gruber (page 17) and provided one response.

\*\* These comments are about filtered water for gardening and raising livestock, so they have been grouped under Kiddwiggins (page 25) and provided one response.

\*\*\* These comments are about whole-house filtration systems (also called point-of-entry treatment or POET) vs. connection to municipal water, so they have been grouped under Oswald (page 31) and provided one response.

## People for an Abundant and Smarter MTCA, received online March 8

We have the following comments and questions about Draft Agreed Order No. DE 24355 for the Spokane Airport:

1. Other known or likely PFAS sources are present in the vicinity of the Spokane Airport, including Fairchild Air Force Base and 17 separate potential third-party PFAS sources that surround the Spokane Airport (Figure 6.1 of 8/13/24 GSI Environmental Site Assessment Report). In addition, there are likely other currently unknown sources of PFAS in the vicinity of the Spokane Airport given the widespread use of and ubiquitous presence of PFAS in the modern world. What is Ecology going to do about these other known PFAS sources and the currently unknown PFAS sources? Further, what scientific basis will Ecology use to distinguish between the various PFAS sources in the vicinity of the Spokane Airport? From our perspective, PFAS impacts in groundwater near the Spokane Airport is a regional issue. Developing an equitable and regional solution would be more appropriate than simply targeting the Spokane Airport with this Agreed Order and the previous Enforcement Order.
2. Section 5.4 of the Findings of Facts says "SIA, operating at the Site, was required by federal law to use products containing perfluoroalkyl substances to meet requirements under the Airport's Federal Aviation Administration operating certificate pursuant to Federal Aviation Regulations 14 CFR Part 139." In other words, the Spokane Airport PLPs [potentially liable persons] were simply following the law and conducting training to prevent people from dying in an airplane fire. Some organizations have had the common sense to recognize airports should not be punished for following the law and preventing death by fire. For instance, a 2023 bill was introduced in the United States Senate to exempt airports from CERCLA [Comprehensive Environmental Response, Compensation, and Liability Act] liability for PFAS releases. Likewise, in a 4/19/24 memorandum, USEPA [U.S. Environmental Protection Agency] indicated that it does not intend to pursue PFAS response actions or costs under CERCLA against publicly owned airports, which "provide a public service by preparing for and suppressing fire emergencies and protecting public safety" and "do not manufacture PFAS nor use PFAS as part of an industrial process." With that context, what relief and support can Ecology provide the Spokane Airport PLPs, who were simply following the law and performing training to save lives?
3. Task 4 (Ecology-Required Emergency Interim Action if required) says "If required by Ecology, the PLPs will implement one or more of the following emergency interim action(s)." We have the following comments/questions about these emergency interim actions:
  - a. Is there currently a drinking water emergency? If so, please articulate the nature and extent of the current emergency. If not, what criteria will Ecology use to determine that there is an emergency that requires an emergency interim action?
  - b. The only interim action in the list of ten potential emergency interim actions that could possibly address an urgent "emergency" from our perspective is Item #10 - "Provision of clean drinking water and/or installation of treatment systems for

impacted residences or businesses." How could Items #1 through #9 immediately address a true drinking water emergency?

- c. If there truly is a real drinking water emergency that is currently known or highly likely to occur soon, why is this Agreed Order draped in MTCA process and legal maneuvering? In an actual emergency, we would prefer Ecology to be laser focused on helping the PLPs to quickly address the emergency rather than diverting time, money, and energy via an idealistic, lengthy, and costly MTCA process.

MTCA process.

4. We encourage Ecology staff to read the 2025 book *Abundance* by Ezra Klein and Derek Thompson in the context of this Agreed Order and current MTCA regulations. The book has insights about how environmental regulations with good intentions (such as MTCA regulations) can also have profoundly negative consequences for other important societal and economic priorities. In this case, the Spokane Airport provides an essential public and economic service for the entire region. Have Ecology staff considered how this Agreed Order and the previous Enforcement Order might affect the ability of the City of Spokane and Spokane County to continue operating and maintaining the airport? Have Ecology staff considered how this Agreed Order and the previous Enforcement Order could impact the regional economy?

Thank you for considering these comments and questions.

## Ecology's response

1. Based on reviewing the data available to Ecology, the airport is a known significant source of PFAS contamination to soil and groundwater, and that contamination has migrated in groundwater off airport property and impacted private wells. This review includes data the airport collected that clearly shows upgradient wells with very low to non-detect PFAS concentrations and very high on-property concentrations. Other sources of PFAS possibly are in the area, and we will likely never know the source of every PFAS molecule in the environment. But Ecology would be derelict in our duty if we postponed interim actions to eliminate the existing contaminant pathway from the airport to residents' drinking water. As the remedial investigation progresses, Ecology will require the responsible parties to find all the contamination coming from their property. This will include installing more upgradient wells to find out if other sources are impacting airport property; but at this time, the existing upgradient wells show little to no impact from other properties onto the airport property.

Ecology agrees PFAS in groundwater is a regional issue in the West Plains. However, the hydrogeologic framework of the West Plains provides compelling justification that contamination coming from Fairchild Air Force Base and the Spokane International Airport (SIA) remains largely separated and should be treated as such until further evidence shows otherwise. As a regional issue, it is important to note that PFAS in groundwater at both Fairchild and SIA were discovered in 2017 — *nine years ago*. Within months of that

discovery, [Fairchild voluntarily began work to eliminate the pathway for PFAS to impacted residents](#)<sup>15</sup> across most of the western half of the West Plains. The parties responsible for SIA, on the other hand, will only now assist its neighbors due to Ecology's Enforcement Order with SIA, Agreed Order with the city and county, and recent declaration that emergency interim actions are required.

Finally, Ecology does not have the regulatory authority to allocate financial responsibility among parties responsible for a contaminant release, whether or not they have been identified as potentially liable persons. For the sake of human health and the environment, MTCA works on a "clean up first, litigate later" mentality. MTCA was a grassroots effort written by Washingtonians to protect our residents, and Ecology's job is to uphold this value.

2. Ecology completely agrees SIA was following Federal Aviation Administration requirements when PFAS was discharged on their property and into the environment. This is no different than other historical and permitted practices resulting in cleanup sites. Municipal solid waste landfills, for example, were typically permitted and operated in compliance with historical permits. However, when society found chemicals that were historically less understood had leached from these landfills and impacted people and the environment, federal and state governments identified these landfills as cleanup sites. It is far from perfect, but it's the tool our country uses to manage these situations.

While EPA released a [memo](#)<sup>16</sup> saying it will not use CERCLA enforcement provisions for airports with PFAS contamination from firefighting foam, 1) this does not mean that EPA will not use CERCLA to voluntarily obtain remedial action at National Priorities List sites, and 2) SIA is not a federally listed CERCLA cleanup site; it is a Washington State cleanup site. The other two largest airports in Washington, [Seattle-Tacoma International Airport](#)<sup>17</sup> and [Paine Field](#),<sup>18</sup> are working proactively and collaboratively with Ecology without the need for enforcement to address their PFAS impacts.

### **State and federal assistance for this cleanup work**

Ecology appreciates your question regarding relief and support we can provide to assist the responsible parties in this cleanup. First, MTCA is partly funded by a hazardous substance tax. Some of this revenue is for cleaning up sites where no responsible parties can be found or they cannot pay, or for sites like this one — where the identified responsible parties are local governments. The most direct way Ecology can provide local governments financial assistance at cleanup sites is through our [Oversight Remedial](#)

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<sup>15</sup> <https://www.spokesman.com/stories/2017/apr/03/firefighting-foam-may-have-contaminated-groundwater/>

<sup>16</sup> <https://www.epa.gov/enforcement/pfas-enforcement-discretion-and-settlement-policy-under-cercla>

<sup>17</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/17061>

<sup>18</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/16912>

[Action Grant \(ORAG\) program](#).<sup>19</sup> Every two years, we encourage local governments that are responsible parties at cleanup sites to apply for an ORAG. If successful, the state would contribute *at least* 50% of the cost of cleanup, subject to funding availability. The last deadline for applying for an ORAG was March 17, and Spokane County applied for \$23.6 million to fund the interim action work. We are reviewing the application and will score it using criteria that applies to all applicants. The previous deadline to apply was March 6, 2024. In the three months leading up to that deadline, Ecology encouraged SIA to apply for an ORAG in person or in writing *at least* ten times; however, they chose not to apply. Rather, the airport's former Chief Executive Officer told Ecology at an in-person meeting that SIA would seek cleanup funding elsewhere.

Ecology and other state and federal agencies have been providing relief to impacted residents on behalf of the responsible parties through many other avenues. Starting in 2024, [Ecology and EPA sampled 411 private drinking water wells](#),<sup>20</sup> mostly in areas downgradient of the airport we now have determined are contaminated by sources coming from airport property. Of those 411 private drinking water wells, 236 were above safe drinking water standards. Ecology began supplying bottled water to 583 residents in 210 households, at a direct cost of \$150,000. Ecology partnered with Washington Department of Health (DOH) to supply 47 countertop filters to 76 residents in 33 households. Since that time, DOH has taken over the effort to provide clean drinking water to impacted residents, which has included continuing to supply bottled water and installing around 260 point-of-use, under-sink treatment systems.

State funding passed through Ecology to support this cleanup includes multiple [Public Participation Grants](#).<sup>21</sup> (PPGs). PPGs assist Ecology and the responsible parties by funding community groups who conduct activities that enhance the impacted, or potentially impacted, public's understanding of, and participation in, the cleanup process. To date, Ecology has allocated \$240,000 in PPG funding over a four-year period for education and outreach about PFAS contamination in the West Plains. Most of this PPG work has been concentrated on areas directly downgradient of the airport. The non-profit recipients of this grant funding, through thousands of volunteer hours, provide a service to the community at a value that far exceeds the actual grant funding amount.

An additional \$450,000 of state funding passed through Ecology for an [area-wide groundwater investigation grant awarded to the City of Medical Lake](#).<sup>22</sup> to develop a model of PFAS contamination in the West Plains. Medical Lake partnered with Dr. Chad Pritchard at Eastern Washington University to complete groundwater sampling and

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<sup>19</sup> <https://ecology.wa.gov/about-us/payments-contracts-grants/grants-loans/find-a-grant-or-loan/oversight-remedial-action-grants-loans>

<sup>20</sup> <https://ecology.wa.gov/getattachment/364184c7-bca8-4bf6-ae7e-c0fbf224f14e/WestPlainsSamplingResultsMap.pdf>

<sup>21</sup> <https://ecology.wa.gov/about-us/payments-contracts-grants/grants-loans/find-a-grant-or-loan/public-participation-grants>

<sup>22</sup> Scroll to the bottom of this page for more information: <https://ecology.wa.gov/west-plains>

analysis, model development, and public outreach. To develop the model, researchers collected groundwater samples from 30 locations four times a year. They sampled another 160 locations one time. All sampling is completed, and we expect the final report in June 2026.

Finally, in 2025 the state of Washington allocated [\\$7.5 million to Spokane County](#)<sup>23</sup> (a responsible party for the airport cleanup) to install point-of-entry treatment systems at impacted private wells in the West Plains. While this funding can be used throughout the West Plains, based on the [interim action area](#)<sup>24</sup> and the [adjacent area for which Fairchild has voluntarily assumed responsibility](#),<sup>25</sup> most of this funding will likely be spent on treatment systems within the area we determined is impacted by contamination coming from airport property.

In summary, the track record of state and federal support for this cleanup site speaks for itself. Ecology staff will continue to assist the responsible parties in any way legally and legislatively feasible in our mission to ensure residents are drinking clean water and the site is investigated and cleaned up in accordance with state law.

### 3. Emergency interim action responses:

- a. Yes, we determined there is a drinking water emergency because people are still drinking contaminated water despite all the state's efforts to provide assistance. On February 10, 2026, Ecology [issued a requirement](#)<sup>26</sup> to the responsible parties to begin emergency interim actions, which include providing clean drinking water to any residents with private wells above drinking water standards in the interim action area.
- b. Ecology disagrees that the only type of interim action that would qualify as an emergency is a "drinking water emergency." Not all potential emergency interim actions would address a drinking water emergency, nor does the [scope of work](#)<sup>27</sup> specify such. For example, if stormwater infrastructure was allowing water with high PFAS concentrations to discharge to surface water and that surface water was discharged to fish-bearing streams or rivers, emergency interim actions could be needed to address this impact.
- c. We based our February 10 decision that contamination coming from airport property has migrated downgradient and impacted off-property groundwater water at levels above safe drinking water standards on all available data, including SIA's January 15, 2026, submission of the draft Initial PFAS Investigation report. The PLP-identification process for the City and County of Spokane began more than nine months ago, and the time necessary to complete the Agreed Order process at a site can vary

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<sup>23</sup> <https://www.spokanecounty.gov/5881/West-Plains-PFAS-Response-Task-Force>

<sup>24</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/image/4686>

<sup>25</sup> [https://www.fairchild.af.mil/Portals/23/documents/Environmental/Sampling%20Area%20Flyer\\_Final.pdf](https://www.fairchild.af.mil/Portals/23/documents/Environmental/Sampling%20Area%20Flyer_Final.pdf)

<sup>26</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/167074>

<sup>27</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/167075>

considerably. In other words, the timing of Ecology's determination that emergency interim actions are necessary and the completion of the Agreed Order is coincidental.

Since the February 10 requirement for interim actions, we have been "laser focused on helping the PLPs to quickly address the emergency." We have supplied all available information regarding Ecology's and DOH's past and present efforts to provide safe drinking water. In addition, we have offered continuous support to the responsible parties as they design and develop the plan for them to take over the state's efforts and provide clean drinking water to impacted residents within the interim action area. We do not believe there is evidence for any factual claim to the contrary.

4. Thank you for the literary suggestion. Several Ecology staff have read *Abundance*, and we would first point out a community's right to clean drinking water is unequivocally *not* a partisan issue. After all, a "culture of abundance" should start with a "culture of care." While we understand there aren't enough societal resources to address the national PFAS crisis at the same level as past contaminant cleanup, we must, at a minimum, ensure our neighbors have access to clean drinking water. The law requires it. Furthermore, balancing the societal costs and benefits of contaminated site cleanup is engrained in Ecology's site management staff, and MTCA is specifically designed to balance remedial costs and benefits, *once direct pathways of contamination to people and the environment are sufficiently addressed*. Ecology agrees the airport provides an essential and necessary public service for the region; however, we believe the interim actions and site remediation required by MTCA are not optional and can be implemented with little impact to the regional economy. Finally, SIA has reported to Ecology that no city or county funding is used in operating or maintaining the airport.

## Anonymous, received online March 2

As an impacted resident who has been following the PFAS issue closely since it came into public awareness early 2024, I applaud Ecology's efforts to name and bring all liable parties into the discussion, planning and clean up.

Residents have been and will continue to be impacted by the contamination of the aquifer. City, county and airport are merely doing the right thing by cooperating with Ecology now, after much delay. Since the airport knew about the contamination as far back as 2017 as evidenced by public records, it is high time they attempt to do right by the people of the West Plains. County is making efforts. Now City and Airport, step up! Residents need well water tests asap and not everyone can afford them. Create grants for water tests with a certified lab to get people on the path towards achieving awareness and proper water treatment solutions.

This is a crappy situation but not insurmountable IF we all work together.

## Ecology's response

Thank you for sharing your appreciation and concerns. Water testing at all private wells within the [interim action area](#) will occur as part of the emergency interim actions we are requiring. We agree interagency, local government, and community coordination are needed to fully

address this issue. We will share this response to comments document with the responsible parties, so they may consider your comments as well.

## **Anonymous, received online March 9**

Key principles laid out in WA Department of Ecology's 2/25/26 presentation materials regarding the Spokane International Airport PFAS site (Polluter Pays, Permanent Remedies, Public Participation, Bias toward Action, and Innovation) are promising insofar as they represent a departure from City of Spokane and Spokane County's inaction toward and suppression of critical PFAS health information from the affected public.

Though the AO clearly is a roadmap document, not an interim/final remediation plan, there are two points to consider when developing and enforcing remediation plans based on the AO:

- 1) (Task 1B Investigation for PFAS) Soil sampling only appears to have been conducted at Fairchild Airforce Base and not on soil of the well-watered properties within the West Plains sampling area. Given the number of years this contaminant is believed present in the well water, the 20x or higher PFAS levels found in many wells, and the known persistence/bioaccumulation of this class of chemicals, soil sampling should be done to determine the health risks posed by inhalation/ingestion exposure routes. Spokane climate is dry and dusty, and many residents have residential gardens, making these exposure routes probable.
- 2) (Task 2 Remedial Investigation) Bias seems to be toward Point of Use (POU) filtering systems which will allow continued soil contamination and long-term use of point-of-entry treatment (POET) filtering systems, rather than providing connections to city water. Filtering systems are not a long-term solution as they frequently fail, require costly monitoring and maintenance, and further shift the burden to the affected community. It is unlikely given the past behavior of Spokane City and County government that these filtering systems will be properly maintained. Moreover, the short-term approach and burden-shifting filtering systems are in direct contradiction to the WA Department of Ecology's stated principles.

My father built my childhood home in Spokane on with his own hands. He was not a rich man, so he built it as he could afford it, bit by bit, room by room, and we still keep the meticulous plans he drafted as family heirlooms. That property was his pride and joy, and we only hope that the Department of Ecology will be able to restore the home he loved.

## **Ecology's response**

Thank you for reviewing the documents and sharing your concerns and preferences.

- 1) Task 1B consisted of an Initial Investigation for PFAS in soil and groundwater limited to airport property. Further soil sampling and analysis will be part of the remedial investigation.

- 2) POU filters are a temporary measure until POETs are installed or homes are connected to city water. Preference for a POET or municipal connection should be shared with the responsible parties as they work on completing the interim actions. The scope of work requires them to maintain filtration systems and continue sampling wells until water meets standards, so that cost should not fall to the affected community. We will continue overseeing this work throughout the cleanup process, not just during initial installation.

## Mary Benham, received online March 8

Thank you Ecology, state Dept of Health, Environmental Protection Agency Region 10, Emergency Mgmt & Superfund office, and EWU-Dr. Pritchard for your excellent work. The 7 years of denial and cover-up by SIA and a county commissioner are reprehensible. Any future requests for delays should be denied.

I am concerned about families still unaware of the health dangers from PFAS.

Since the current plan to hire "navigators" to go door to door to assess residents' awareness of PFAS does not seem to be working, I wonder if a mailing (using the assessor's data base and return address to get their attention) could be sent out with a postage paid return card with a few boxes to check: "I do not know what PFAS is" "I am not aware of any contamination problems with my well water" "My well has been tested and I submitted the results to the Dept. of Ecology" etc.

After a month, residents who did not respond would receive a phone call (does the County match phone numbers w/properties?), then follow-up to schedule a well test. Perhaps Fire District staff, the Health Dept. and volunteers from the West Plains Water Coalition, etc. could assist.

The goal should be PFAS data for every well likely to be contaminated, regardless of boundaries, then either Fairchild or SIA must respond.

## Ecology's response

Thank you for sharing your appreciation and concerns. We share your concern that some West Plains residents are still unaware of the potential for PFAS contamination in drinking water.

The Spokane Regional Health District (SRHD) hired two Navigators in March 2026. They have not yet begun their work in the community. We met with the first Navigator and her SRHD supervisor on March 10 to provide background on this issue and offer assistance where possible. We will share your ideas and continue to offer our help as they work with the community, gather information, and select filtration systems.

The parties responsible for the airport cleanup are also required to contact everyone in the [interim action area](#). If people don't respond to letters or provide their information via a web form or at public events, the responsible parties will go door to door in an attempt to contact everyone.

## Crystal A. Bingham, received online March 3

At our first West Plains citizens meeting in May 2024 Mr. French tried to pawn off the contamination on when the military owned the airport.

A quick google check during that meeting found the airport was transferred to civilian control in 1945: "(formerly Geiger Field) was transferred from the U.S. War Department to Spokane County by the War Assets Administration in 1945."

Likewise: the fire fighting foam was not developed until 1960s: "PFAS-based firefighting foam, specifically Aqueous Film-Forming Foam (AFFF), was invented in the 1960s through a collaboration between the U.S. Navy and the 3M company.. A patent for a PFAS-containing fire-suppressing foam was obtained in 1966."

I advised Mr. French of these facts during the meeting.

Mr. French admitted at those two meetings that he knew of the contamination in 2017. We were not advised until 2024 by the State of Washington. Not SIA, Not our County Commissioner(s). Not the City of Spokane.

The County and City are responsible for making us whole. We do not blame SIA, the City and County for the use of this product at a time when no one knew its dangers. We blame them for keeping it secret.

Thankfully, gratefully, the State of Washington provided drinking water for those of us who had our water tested. For seven years longer then necessary for us and nine years for many of our neighbors we drank and they are drinking toxic water.

Mr. French in particular has our ire and anger because he is our representative and he was part of the cover-up for seven years. He has lied to his constituents in these meetings, and has lied to me personally.

Our local government, city and county, failed us. They have been disloyal and betrayed the trust we placed in their elections.

The State's water program has now ended. Many neighbors are not finding the under-sink (ONE sink) installation satisfactory.

Our family purchased a whole-house filtration and storage system, which supplies our garden and livestock, at a cost of about \$15K with installation.

We should be reimbursed. ONLY reimbursement would make us 'whole.'

Our neighbors deserve the same.

## Ecology's response

Thank you for your comment. The under-sink filters the Washington Department of Health provided are intended to be a temporary measure prior to installing point-of-entry treatment (POET) systems. While it will take time, connecting to municipal water or installing POET systems for all private wells with PFAS levels above drinking water standards within the [interim action area](#) will occur as part of the emergency interim actions we are requiring.

To recover the costs of installing and maintaining a water filtration system you purchased, we recommend you speak to a lawyer. Ecology doesn't have the authority to require parties responsible for contamination to reimburse you for filtration costs. You could seek reimbursement under a separate private action.

## Jennifer Ekstrom on behalf of Russ and Joann Ekstrom, received via email March 8

We are submitting this comment letter regarding PFAS contamination associated with Spokane International Airport, and the Department of Ecology's cleanup process. Thank you for your efforts to understand this problem and hold the polluters accountable!

My parents, Russ and Joann Ekstrom, have lived at [address omitted] since purchasing the property in 1995. Their home is located in the heart of the currently identified PFAS impact area. During the Department of Ecology's well sampling effort, their private well was tested only once. The results from that single sample showed PFAS levels that were elevated but just below the threshold at which assistance with drinking water treatment was provided at that time.

We believe that relying on a single sample is inadequate to fully assess PFAS exposure risk in a private well. PFAS concentrations in groundwater can fluctuate due to seasonal groundwater changes, pumping patterns, and plume movement. For residents who rely entirely on private wells for drinking water, additional monitoring is important to ensure that contamination levels do not exceed safe thresholds over time.

For these reasons, we respectfully request that the Department of Ecology require the responsible parties to:

1. Conduct additional PFAS testing of the well at [address omitted] to evaluate potential seasonal variation in contamination levels, and the variation over time.
2. Provide interim protection for the household, such as installation of a whole-home or point-of-entry filtration system, given that PFAS levels have already been detected in their well water.
3. Prioritize long-term solutions for impacted residents in this area, including annexation or connection to the Spokane municipal drinking water system when infrastructure expansion becomes feasible.

Residents who have lived in this area for decades should not bear the burden of uncertainty about the safety of their drinking water. Additional testing and precautionary measures would

provide greater confidence that public health is being protected while the broader PFAS investigation and cleanup process continues.

Thank you for considering these comments and for your work addressing PFAS contamination in the Spokane area.

### Ecology's responses

Thank you for sharing your concerns and ideas. The Ecology-required emergency interim actions include providing all residents with private wells within the [interim action area](#):

- Bottled water and/or point-of use (POU) filtration systems for private wells with PFAS above drinking water standards (short-term interim action)
- Testing for all private wells and treatment system maintenance, even if your well has already been sampled
- Point-of-entry treatment (POET) systems or connection to city water where possible for private wells with PFAS above drinking water standards (long-term interim action)

### Interim action area boundary

#### Renata and Michael Gruber, received online February 28

Thank you for the opportunity to make a comment. We have had a well water analysis done by the Department of Ecology, United States EPA region 10, done on 6/12/2024. Results were sent to us from the US EPA signed by Jeffery Fowlow, and David Burford. Results show severe well water contamination with several PFAS contaminants. We are also receiving water from Culligan set up for us by the EPA (thank you).

I would like to point out that the area map for interim action does not include our location. We are north of the north border on Old Trails Rd. We have participated in the voluntary well testing and have shared our results with the EPA. How are these arbitrary boundaries being decided? We have several neighbors that have proven contaminated well water who are not in the interim action area per the map shared by the EPA.

We are requesting a point of entry system for our well, not an under sink 0.5 gallon per minute unit that does not address garden irrigation and watering of livestock much less general household needs. Pumping PFAS contaminated well water from almost 350 feet down and using it to irrigate (further contaminate the ground) does not help solve a worsening water contamination problem.

#### Gail Oneal, received online March 5

I appreciate the work being done and beginning phases of PFAS well remediation and mitigation. However our well and a number of neighbors' wells are outside the new Interim area as shown on the map presented to the community. Our community well has TEN households. Who will help us? We need justice and cleanup too.

### **Donna Robins, received online March 5**

Thank you to the DOE and DOH for keeping the local PFAS affected homeowners apprised of the ongoing identification and mitigation of contaminated water wells. I was recently surprised to learn of what appears to be an arbitrary diagonal line on Old Trails Rd south of Newkirk Rd distinguishing the boundary of Airport/City of Spokane responsibility. Maybe it can be revealed to those of us north of that line how that concerning conclusion was obtained. To us, the water didn't stop flowing. To be included in the testing area, have contaminated results, and then excluded from the solution is to say the least disheartening.

### **Scott Walker, received online February 28**

Why is the latest map of the affected area leaving out the original northern end of the map, specifically most of North Old Trails road? Many wells in this area have very high levels of PFAS, proven by the first round of private well testing. For example, our well contains over 35 times the "safe" level of PFAS.

Prior to redrawing the affected area map, we have received delivered bottled water, and a POU filter was installed last December. I want to make sure we, and our neighbors, are not excluded from future PFAS cleanup efforts and the eventual POET system installation.

### **Lisa Wren, received online February 26**

The boundary to the east is not far enough. How do we get this extended?

#### **Ecology's response**

Thank you for sharing your questions and concerns about the current [interim action area](#) boundary. We know it is not perfect, and it could change as the investigation continues.

The northern boundary was drawn to separate, based on current data and hydrogeologic information, areas we believe are impacted by Fairchild Air Force Base or the Spokane International Airport. Research shows the paleochannels, which are gravel-filled valleys, within the West Plains serve as high-speed conduits for moving groundwater and contamination. Ecology believes contamination in and near the Airway Heights paleochannel (see Figure 1 on the next page) most likely came from Fairchild. North of Trails Road, the Airway Heights paleochannel changes direction from north to northeast. Likewise, the Airport paleochannel turns northeast and follows Trails Road toward the Spokane River. The northern boundary of the interim action area generally aligns with the centerline between the Airway Heights paleochannel and the Airport paleochannel. We can't require the parties responsible for the airport to provide safe water in areas we believe, at this time, are impacted by Fairchild.

Ecology identified Hangman Creek and the Spokane River as the eastern boundary for two main reasons. First, municipal water is provided to areas east of these water bodies, and second, the water bodies likely create hydrogeologic barriers for contaminants. In other words, we believe it is unlikely contamination coming from the airport has moved east of these water bodies.

For impacted residents outside the interim action area, the Washington Department of Health will continue to provide bottled water and install under-sink filter systems. In addition, the Washington Legislature provided Spokane County \$7.5 million to install point-of-entry

treatment systems for *any* impacted residents within the West Plains, not limited to the interim action area.

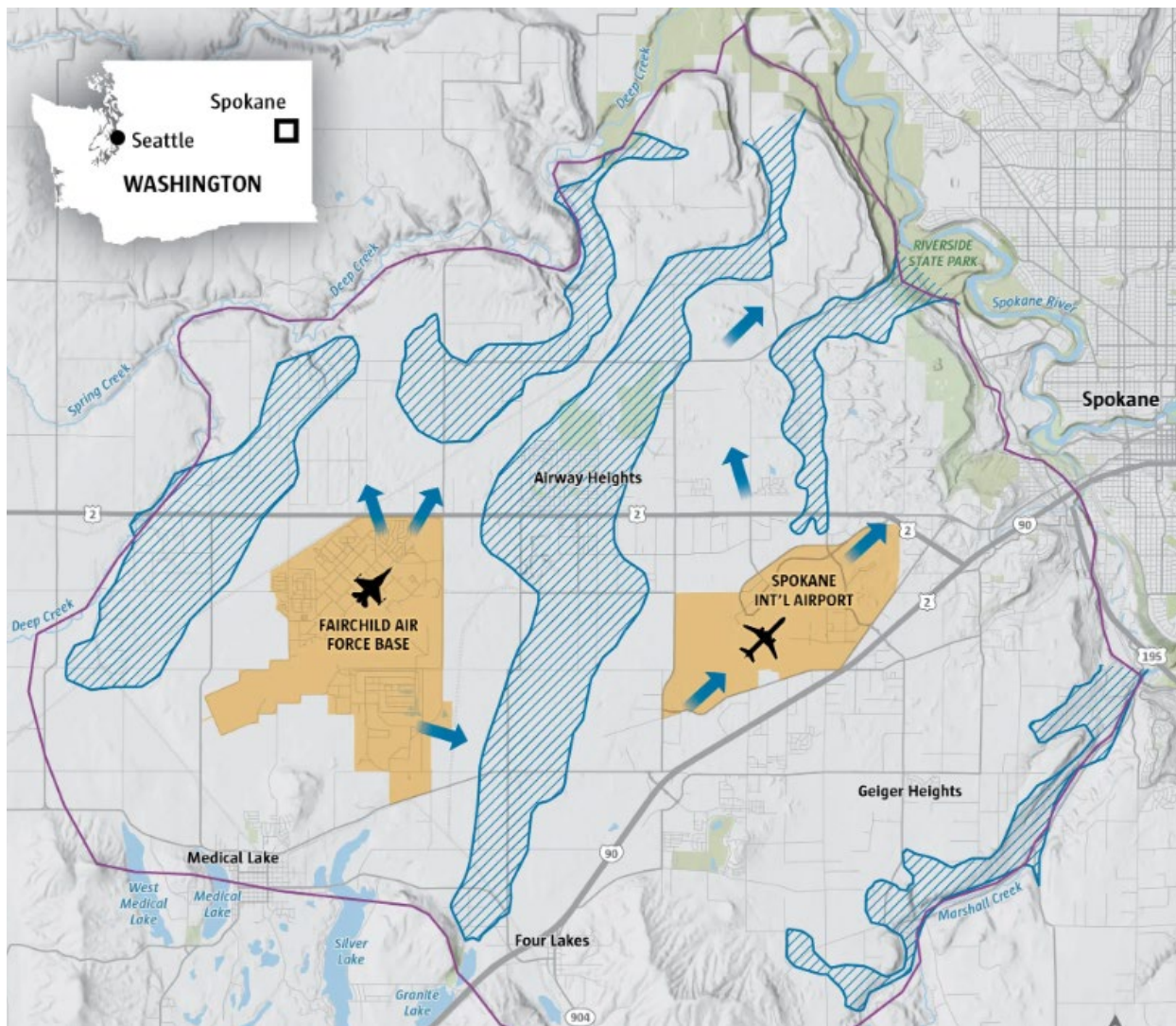


Figure 1. Paleochannels in the West Plains.

## Charles Gruenfelder, received online March 9

Thank you for the opportunity to offer comments on the draft SIA Agreed Order DE 24355. A few comments for your consideration are presented below.

Exhibit B, Scope of Work and Schedule  
TASK 1 - Site Assessment Report for PFAS  
Sampling and Analysis Plan

Please consider the following proposed modifications:

Page 7,

Section 9.9 - SUGGESTED REVISION: Analytical procedures, methods, detection limits, and analytical concentration goals to achieve MTCA Method A and Method B cleanup levels

SUGGESTED LANGUAGE to insert after Section 9.9 as a new Section 9.10 line item: Analytical Data Review and Data Validation Procedures

Section 13.3 - SUGGESTED REVISION: Description of field parameter measurements, instrumentation, and well purging protocols to achieve geochemical stabilization prior to sampling.

## TASK 2 - REMEDIAL INVESTIGATION

Page 8,

Section 2.4 SUGGESTED REVISION: Estimate hydraulic parameters such as hydraulic conductivity, porosity, horizontal and vertical hydraulic gradients, and groundwater flow velocity within primary water-bearing hydrostratigraphic units

Page 9

Section 2.7 SUGGESTED REVISION: Analyze groundwater samples for a contaminant suite guided by historical property use, existing facility operations, and suspected contaminants of potential concern based on available sampling and analysis data

Section 2.9 SUGGESTED REVISION: Generate maps and/or figures showing groundwater potentiometry for each primary, water-bearing hydrostratigraphic unit and cross-sections depicting hydrostratigraphic units and apparent contact elevations

Section 5.1 SUGGESTED REVISION: If the potential for surface water impact is found, analyze surface water samples for the applicable contaminant suite that addresses both human and ecological receptors.

## TASK 6 - QUARTERLY GROUNDWATER MONITORING AND REPORTING

Page 16

Section 4.1.1 SUGGESTED REVISION: Evaluation of groundwater flow rates and directions including potentiometric maps for each discrete hydrostratigraphic unit (i.e., unconsolidated deposits, Basalt A, Basalt B)

Section 4.1.2 SUGGESTED REVISION: Evaluation of horizontal and vertical hydraulic gradients

Section 4.2.2 SUGGESTED REVISION: Results summary including time-series concentration plots and an analysis of statistically-significant trends once adequate data have been generated.

## Ecology's response

Thank you for your comments. We will ensure the plans describing the work and reporting to be completed for each deliverable include this level of detail and information.

### John Hancock, received online March 9

- A. Ecology's evidence- and process-based Airport historical narrative does not reveal when and who knew what about PFAS in Airport groundwater, and with whom it was revealed and discussed. Contrary evidence, finger-pointing, and confidentiality reveal a failure of conflict-of-interest duties among the 3 Parties and their subsidiaries. This is beyond the duty of Airport's engineers, but it's clearly within the scope of what the neighbors would like to know. I have confidence now in Ecology, but until this whole endeavor is discussed in public by the elected leaders of the Parties, the difficult and conflicting methods of protecting both the citizens and the Airport cannot be understood. The long-lasting and unimaginably expensive path ahead will win public support only if it's explored in public, not in Executive Sessions, with all documentation available freely and constructively to anyone.
- B. Airport's story-telling and map references about FAA regulations does not reveal whether Airport actually followed the rules it quotes. Commissioner French's testimony in his recall hearing contradicts Airport's reports about the amount of AFFF storage and application; and in his own historical report, the claim that Fairchild PFAS migrated eastward beyond the Airway Heights paleochannel, onto property tested by the Airport itself.
- C. This home filters plan duplicates, depending on location, the funding and technical eligibility of the PFAS Task Force filter project. These 2 projects will require close coordination, so no home is omitted nor duplicated.
- D. The PFAS boundary with Fairchild is arbitrary. I recommend a special interagency method of timely updates to assessment and planning on both sides of Hayford Rd.
- E. I applaud the PFAS property tax implication study by the Spokane County Assessor, and I urge all parties to integrate that information into long-term cleanup feasibility planning.

This Comment concerns the Public Participation Plan:

- 1. Your plans for promotion and advertising are noteworthy. I suggest that Airport's notification methods be as stringent and timely, and that Ecology standards also be pushed toward Fairchild by your representatives to that advisory organization.
- 2. Notification within the quarter-mile radius of site omits other homeowners with high results from the EPA study. Your teaching of the definition of "site" is an urgent matter of trustbuilding.
- 3. Site expansion, which I understand must be based on clear evidence, deserves rapid additional testing, though it may require test wells in new areas between widely-dispersed homes.

4. The distinction between property owners and residents is vital, because protecting real estate value is a different motivation than protecting health. The "long term" cleanup duty affects these 2 kinds of persons in far different ways.
5. Fairchild's data on variability of well results, seasonal and over time, including results from my own well on Deep Creek, illustrates that one-time tests may not be sufficient as risk assessment.
6. Hard-copy archives of your investigation should also be established and maintained at the Airway Heights branch of Spokane County Library, because it's more accessible than your headquarters at Monroe & Wellesley.
7. (The HUB is no longer renting to outside organizations.)

### Ecology's response

Thank you for reviewing the documents and sharing your thoughts. We have lettered/numbered our responses corresponding to your comments.

- A. We will share your comment with the responsible parties so they may review it. We have no knowledge of, and cannot speak to, the responsible parties' historical decisions about disclosure or non-disclosure of contamination and who knew what and when.
- B. We also cannot speak to potential contradictions in Commissioner French's testimony, his historical report, and airport reports.
- C. We agree coordination is needed to ensure various programs providing filtration systems are covering different areas, so everyone who needs it can receive assistance. Ecology has and will continue to meet regularly and share information with parties working on PFAS in the West Plains.
- D. We meet regularly with Fairchild Air Force Base and participate in the Restoration Advisory Board. While the Hayford Road boundary is somewhat arbitrary, it is now covered on both sides, and we will change that boundary as necessary when we have more groundwater sampling data.
- E. Ecology will review the Spokane County Assessor's Office study on impacts to real estate values due to PFAS contamination in groundwater and include information from it in our cleanup decisions as applicable.

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1. Thank you for commending our information-sharing methods. Sample public outreach documents and descriptions of other contact methods are a required part of the interim action work plans the responsible parties are developing. We have communicated our expectation that everyone within the interim action area should be reached by whatever means necessary. We meet regularly with Fairchild and share information, but its communication program is beyond our control.

2. Notifying addresses within a quarter-mile radius of the site is Ecology's minimum standard. Perhaps this information should be removed from the plan when the specific mailing list area is already defined to reduce confusion. The interim action area is our current mailing list area, which covers over 40 square miles.
3. The areal extent of the interim action area is subject to change as we better understand the extent of contamination coming from the airport. That understanding will be refined as we enter the remedial investigation phase of cleanup.
4. Our mailing list includes residents within the interim action area and owners of those properties when their address is different from the parcel address. While protecting people's health by ensuring they have safe water is our top priority, we have published [\*PFAS in Private Wells: Focus on Real Estate Transactions\*](#)<sup>28</sup> to help buyers and sellers understand their requirements and rights. We have also issued a [\*well drilling advisory\*](#)<sup>29</sup> to raise awareness of potential groundwater contamination with well drillers. It doesn't prohibit drilling new wells.
5. We agree a single well testing result is only a snapshot in time and could change. We are requiring the parties responsible for cleanup to test contaminated wells once a year and non-detect wells or wells with PFAS below drinking water standards every other year.
6. Ecology has a standard practice of making draft documents available at location(s) within the affected community and is willing to do so if there's interest amongst the community. However, when libraries closed during the COVID-19 pandemic, we started offering to mail documents upon request. We have received a few requests for mailed documents, but not many. In fulfilling these requests, we work with requestors to determine what they seek, and often they do not want the whole document, which can be lengthy. The offer to mail print documents has been included in all our airport cleanup public comment period notices, and no one has requested them. Yours is the first request for maintaining document repositories, and I use that term instead of archives because we can only ask libraries to keep documents during open comment periods. Many do not have shelf space to hold volumes of technical reports for the years it takes to complete cleanups. We have found that mailing print documents upon request is more efficient and saves resources for the public and libraries, but we are open to having documents at the Airway Heights Library during comment periods if there's significant interest.
7. Thank you for letting us know the HUB is no longer renting to outside organizations. We have removed this from the Public Participation Plan as a potential meeting location.

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<sup>28</sup> <https://apps.ecology.wa.gov/publications/documents/2409031.pdf>

<sup>29</sup> <https://ecology.wa.gov/west-plains-pfas-well-drilling-advisory>

## **John Hancock, West Plains Water Coalition President, received online March 9**

Ecology's current investigation of PFAS at SIA is a dream come true. Since 2024, the application of State regs and authorities seems swift and certain. While we wish it were faster, we're also reminded that our drinking water safety depends on proven evidence. I'm confident now that in Washington, the rules will aid our recovery.

But time and money are finite. Home filters cannot be purchased and installed without payment by the Responsible Parties, received through the channels they choose. How our West Plains drinking water crisis stacks up against all the issues and needs of Spokane and Spokane County, and the priorities of both State and local health authorities will be a potent debate for a long time. Let's not keep waiting, "forever".

Our West Plains culture is threatened by worry about clean water, which manifests as personal stress, illness, properties that won't sell, instability in inter-generational family stewardship, giving up gardening and farming, and frictions among neighbors.

Since PFAS discoveries began at Fairchild in 2017, scientific evidence now shows that it gradually declines in our bodies over time, hastened by clean water consumption by ourselves, our children, and throughout the food chain. But the toxicity in current groundwater is enormous, deserving the universal testing and filters mandated by these emergency orders. "Made whole" is a wish still hard to imagine.

Count on the West Plains Water Coalition for continued partnership in this vital endeavor, and for first-person accounts of conditions and solutions, on the way to clean rural drinking water for us all.

### **Ecology's response**

Thank you for sharing your local experience and helping us educate and engage the community in this issue. We agree time is of the essence when it comes to safe water and whole-house filtration systems. We have set a fast-paced schedule for the emergency interim action work plans, and we are cooperating with the parties responsible for the airport cleanup, offering any information and assistance we can to help them provide filtration and well testing as quickly as possible.

## **David Jones, received online February 28**

I am underwhelmed by the functionality of the under sink units and am skeptical of the capabilities of a POET system to meet the need of residents who use their well water to irrigate and water animals. The loss of water pressure is substantial and I am informing all parties that I will accept no remediation that does not maintain the full functionality of my well system while removing harmful poisons.

## Ecology's response

Thank you for sharing your concerns and preferences for a treatment system. We will share this response to comments with the responsible parties, so they can consider it as they design systems.

## Filtered water for gardening and raising livestock

### Kimra Kiddwiggins, received online February 19 and March 7

My husband and I are most concerned about getting whole house filtration, some sort of connection outside to water our gardens and animals, how to clean up chicken coop area as chicken eggs are contaminated with PFAS. Both my husband and I have tested with High PFAS contamination too.

Install whole house filters they are needed now!

### Rachel Lander, received online February 27

If we have a whole house water filter installed, will it include outside spigots that are attached to the house? If not, is there any way to filter water for gardening and livestock?

We don't have chickens yet but plan to get some soon. If we give them filtered water, is there still a chance for contamination from ground soil and bugs?

## Ecology's response

Thank you for asking these questions we know are common among the community.

As part of the long-term emergency interim actions, Ecology is requiring the responsible parties to install and maintain point-of-entry treatment (POET) systems at residences with private wells above safe drinking water standards. We expect these POETs to be designed and installed so outdoor water applications will use treated water. This ensures residents can use their property as they were previously and prevents adding more PFAS into the environment.

We consulted Barb Morrissey, a toxicologist with the Washington Department of Health (DOH), to aid our response regarding chickens. We suspect soil in the chicken yard is the main source of ongoing exposure to chickens that have been switched to a clean source of water. Chickens swallow dirt directly, or eat worms and bugs that absorb PFAS from the soil. In addition, eating forage plants that have been watered with contaminated groundwater could expose chickens to PFAS.

Since December 2023, DOH has tested home-raised eggs and meat four times, collecting the fourth round of samples on March 7 and 8. Some of these samples were from households who were tested previously and have taken action to reduce PFAS exposure to chickens. This informs us about what is working to lower PFAS in the eggs.

- The most common action taken has been switching hens to filtered or bottled water. Switching the hens to a clean source of water has lowered PFAS in the eggs. It might not

always be enough. We are still seeing some eggs with PFAS above our recommended limit for unrestricted eating.

- Two families tried having their chickens on clean soil. One had a stationary coop they could not move. They dug up the top 1 foot of soil from the coop and yard and replaced it with 1 foot of fresh soil. DOH retested their eggs in early March. The other household moved their coop and chicken yard to a new location and started over with new chicks. Those chickens won't be laying until this summer, so DOH hopes to retest their eggs then.

You can learn more about PFAS in water and gardening, livestock, and pets on [DOH's PFAS website](#)<sup>30</sup> and in this [publication](#)<sup>31</sup> by the Washington Department of Agriculture and DOH.

## **Caj Matheson, Coeur d'Alene Tribe Director of Natural Resources, received via email March 9**

The Coeur d'Alene Tribal Natural Resources Department appreciates the opportunity to comment on the Agreed Order and related Public Participation Plan for the site referred to as the Spokane International Airport PFAS site, Facility Site ID 6332493. As you are aware, this site is part of our shared aboriginal territory, and is in close proximity to Hangman Creek and the Spokane River, where we are currently engaged in full-scale efforts to restore historic smilch (salmon) populations that once sustained our people for millennia.

Given the growing understanding of the threat to public health posed by PFAS as a forever chemical, we appreciate the efforts by Department of Ecology to move quickly and aggressively to hold the potentially liable parties (PLPs) accountable through the Agreed Order, and the supporting public participation plan.

As the remedial investigation, feasibility study, and interim clean-up actions move forward, the Coeur d'Alene Tribe looks forward to continued opportunities to discuss our concerns with Ecology regarding human and ecological health impacts, and will be particularly interested in better understanding groundwater/surface water interactions.

If you have any questions or concerns, please do not hesitate to contact me at (208) 686-1009 or [caj.matheson@cdatribe-nsn.gov](mailto:caj.matheson@cdatribe-nsn.gov).

### **Ecology's response**

Thank you for your comment. The remedial investigation will evaluate all potential contaminant pathways, which will include determining whether surface water is impacted. If impacts to surface water are confirmed, we will require remedial actions to address these impacts.

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<sup>30</sup> <https://doh.wa.gov/community-and-environment/contaminants/pfas/food-fish-livestock-and-gardens>

<sup>31</sup> <https://doh.wa.gov/sites/default/files/2024-01/WSDA-DOHpetslivestockgardens.pdf>

## Douglas McBride, received online March 9

My response has two parts. First part is my comments on the Agreed Order. Second part is more personal on how this contamination affects us all living here in so many aspects of our lives.

----- Part 1 -----

Reference: Remedial Action by: City of Spokane/Spokane County Agreed Order No. DE 24355.

Page 13 of 21 (pdf page 37) Bulleted point 10 says "Provision of clean drinking water and/or installation of treatment systems for impacted residences or businesses".

There is very little in the AO about providing people safe water.

My comments:

1. With the responsible party identified, please do not delay installing the whole house/farm water systems to the affected people. It is people's lives at stake.
2. Please make sure to add a section that the responsible part needs to provide the whole house system hardware, installation, provide all the maintenance of the entire system, including scheduled replacement elements, repairs to hardware of these systems, and emergency callout service in case of system failure. The costs to supply/maintain these systems will be provided to the homeowner at no cost until a time in the future the water is safe to drink. I would like to see it noted that these costs will be covered into the future, even if it takes decades till our water runs clean again.
3. We are a small farm and need clean water for our animals and irrigation. The size of the filtration system being provided needs to be big enough to meet the farmers/ranchers' needs. We don't want to irrigate the fields or animals with contaminated water; to later find out we can't sell our future products as they are contaminated too. The order should include a statement that the size of the filtration system provided will adequately cover the size of the business/farm. The costs of maintaining the larger systems will be provided at no cost to the farmer/ranchers. Maintenance and filter elements will continue to be provided at no cost to the owners until the water is considered safe levels for humans to drink. City water is not an good option for farmers as we use a lot of water. If the water we use is not safe, then we are putting unsafe food products into distribution and on the plates of unsuspecting consumers.
4. Wells affected should receive at a minimum, twice a year sampling provided at no charge to the landowners. Wells that have previously tested negative should be tested annually as the chemical is spreading.
5. Add a provision for future wells testing positive, should be covered, even if outside the current spread map. The chemical is moving and people need protection.

----- Part 2 -----

A bit more of my story so others can see how this contaminated water affects families in aspects of their daily life and the loss of parents from cancer.

My parents homesteaded our 50 acres over 55 years ago. I grew up on this farm. My parents lived on this property continuously until their deaths three years ago. Their only source of water was from the deep wells on this property.

My parents both died (3-months apart) from similar cancer. I took care of my parents so I will never forget the memories of how the cancer manifests, the severe pain and agony each of them suffered until they died. I hope our actions will help others avoid going through what my family endured.

After their death, I paid for a water test and it showed high in the PFOA family of chemicals. Yikes, the water we drank for half a century was contaminated! Immediately we put our house and rental house on bottled water.

My aunt, who lived with my parents for years, had her blood tested. Results came back positive for PFOAs. She was scared and moved out to a place in town.

I am a triple cancer survivor and really would like your help to keep my family, kids and grandkids safe from this chemical. We currently have single POU filtered water faucet in our home and our rental house. As you might know, keeping water pitchers around the house is a chore. Even worse is trying to remember not to use the water from the contaminated faucets. For example, before you brush your teeth, you must first go to the kitchen and get a glass of filtered water. When you want to take your pills, you make another trip to the kitchen for more clean water.

My wife has been diagnosed with a medical-memory condition. It is very hard for her to remember NOT to use the bathrooms water to take her medications or brush her teeth. In the kitchen, she gets confused as it is ok to use contaminated water from the kitchen sink to wash the dishes BUT you must put the faucet's handle in a different position before you fill your pot for cooking or drinking. Feels like life and death are both connected to the same faucet, just a swing of the handle put you in danger.

My father was one of this area's Washington State Fire Commissioners for 30 years. Please help honor his 3 decades of volunteer service to this community by helping us making our water safe again.

Again, we hope our story helps the team see the need for whole house filters. We don't want anyone else to have to witness the painful suffering and agony from a cancer death.

## Ecology's response

1. As part of the long-term emergency interim actions in the [scope of work](#), Ecology is requiring the responsible parties to install and maintain point-of-entry treatment (POET) systems at residences with private wells above safe drinking water standards. Please

know this will be a significant undertaking. Beginning POET system installation will take time, which is why we required the short-term emergency interim action. This includes providing clean drinking water through a point-of-use treatment system or bottled water.

2. The responsible parties are required to install and maintain the POET systems until drinking water standards are met.
3. Ecology expects these POETs to be designed and installed so outdoor water applications will use treated water. This ensures residents can use their property as they were previously and prevents adding more PFAS into the environment.
4. As part of the long-term emergency interim actions, Ecology is requiring annual testing for impacted wells and testing every other year for wells that do not have PFAS detections.
5. Both the short- and long-term emergency interim actions require the responsible parties to provide clean drinking water for any well in the [interim action area](#) with PFAS above drinking water standards. The areal extent of the interim action area could change as we better understand the extent of contamination coming from the airport. For impacted residents outside the interim action area, the Washington Department of Health will continue to provide bottled water or install under-sink filter systems. In addition, the Washington Legislature provided Spokane County \$7.5 million to install POET systems for *any* impacted residents within the West Plains, not limited to the interim action area.

Part 2: We appreciate you sharing how this issue has affected you and your family and understand that using a POU system is inconvenient to say the least. We, too, hope the actions taken today will reduce the potential for impact to the existing community and future generations. We will share this response to comments document with the responsible parties, so they may consider your comments as well.

## JE McHugh, received online March 2

Thank you Ecology and Spokane's Toxic Cleanup Team!

- 1) No more extensions for SIA - impacted residents are done waiting - it's been 9 years since SIA first discovered PFAS in their monitoring wells.
- 2) Is there an intention to incorporate Dr. C Pritchard/EWU's Fate & Transport study results for cross verification? 2-pg results attached as .pdf [**Ecology note:** See the Appendix on page 38 for attachments referenced in these comments.]
- 3) Will SIA's responsibilities also extend to surface water PFAS monitoring and cleanup? Dr. Pritchard's study also included surface water sampling, finding high PFAS levels that eventually reach Latah Creek and the Spokane River. Decades and millions have been spent cleaning up PCBs in the river- are there plans to also protect the river from PFAS contamination?
- 4) The Pacific NW Technology Park - please revisit City of Spokane B2402251 SEPA review of a proposal to collect, conduct and dispose of stormwater into the Airport Paleochannel. The review is inadequate in addressing known PFAS contamination or the

transmissive qualities of the paleochannels, and is proposing to further threaten downgradient domestic wells with stormwater disposal. .pdf attached.

- 5) Ecology's SIA boundary map does not match that of the S3R3 Solutions (city-county-airport Public Development Authority) area of intent to develop. There must be a requirement to review, for contamination potential, all development applications by businesses to locate on the 9,000 acres (including 300 acres of wetlands) under this PDA control. .pdf of PDA Wetlands Survey attached.
- 6) For all future West Plains development reliant on sole source wells, a Point-of-Entry Treatment (POET) system must be reserved. Or Ecology should halt issuance of all well permits on the West Plains until/unless PFAS is proven to be controlled/eliminated - might this be an application of the 'Inadvertent Discovery Plan'?
- 7) As with Fairchild AFB's provision of POET systems to PFAS impacted homes, there is also maintenance and filter replacement in perpetuity. Will this be required of city-county-SIA provided POET systems?
- 8) At the 2/12/2026 first public meeting hosted by and at Spokane Regional Health, SIA management announced 2025 revenue at \$3 billion. Will a surety bond be required to ensure they meet their obligations? SIA apparently has the funds, but a questionable inclination to make contaminated well owners whole.

Thank you Ecology, state Dept of Health, Environmental Protection Agency Region 10, Emergency Mgmt & Superfund office, and EWU-Dr. Pritchard. All have shouldered an immense task and are collectively finding the way to solutions.

### Ecology's response

Thank you for your comments and gratitude for our work. We numbered our responses to match your comments.

- 1) Wherever practicable, we will require the airport to follow the schedule in the Enforcement Order.
- 2) The EWU fate and transport study will be reviewed, along with all other site- and West Plains-specific data and hydrogeologic information, when we evaluate data collected and reports submitted as part of the cleanup.
- 3) If impacts from the airport to surface water are confirmed, we will require the responsible parties to address those impacts.
- 4) The Pacific NW Technology Park project is outside the scope of work required by the responsible parties' orders. However, we evaluate potential impacts of projects on nearby cleanup sites through the State Environmental Policy Act (SEPA) process.
- 5) We evaluate the potential impacts of projects on nearby cleanup sites through the SEPA process.

- 6) We are requiring the responsible parties to install and maintain point-of-entry treatment (POET) systems or connection to municipal water at residences with private wells above safe drinking water standards. The requirement is not limited to existing wells.
- 7) The emergency interim actions require the responsible parties to operate and maintain the POET systems they install.
- 8) The responsible parties are required to fund the work in the orders. Ecology doesn't allocate rates between the responsible parties and can only lien property to recover costs we expend directly for cleanup.

## **Whole-house treatment systems vs. connection to municipal water**

### **John Oswald, received online February 20**

I've read one option is to place us onto Spokane water system. My question is who's paying for the water. In summer months I use roughly 100k gal a week (pasture, garden lawn, live stock). If I pay the water usage this is not doable, and I will decline this option.

### **Linda Reynolds, received online February 27**

Questions: In a situation in which a residence with a contaminated well is in a location where connection to a municipal water system would be an option would the property owner have an option to choose? That is, if their preference is for a well filter system rather than piped municipal water do they get to choose to keep their well with a filter system?

If a residence with a contaminated well is provided with piped municipal water do they become obligated to pay for the water out of pocket from then on? at the same rate as other homes in the area that had piped water from the time of original construction?

### **Ecology's response**

Thank you for your comments. While Ecology is requiring the responsible parties to install and maintain point-of-entry treatment (POET) systems or connect residences with private wells above safe drinking water standards to municipal water, it is too soon to know whether the responsible parties will allow residents to choose which solution they prefer. We will, however, share this concern with the responsible parties as they are developing the plans to complete the interim actions. For those residents who are connected to a municipal water supply, long-term water costs from the municipality would need to be individually negotiated between the resident and the responsible parties.

### **Nick Scharff, received online March 4**

Thank you, Wa Department of Ecology for Leaning, into this West Plains Water contamination issue and identifying Potential Liabile Parties (PLP). This is far overdue with nearly a decade behind initial discovery. Please do not allow more delays for action by PLPs that compromise Public and neighbors safety!

It is very disappointing to say the least to see that FAFB and SIA impacted areas continue to be treated separately by an arbitrary line that no one can see, simply a line in the road or across a field . The affected down streamers off their respective property lines are essentially the same ,( General public and taxpayers of “Spokane County”) It would seem that more resources become available when combining efforts for efficiencies with the same end goal “SAFE WATER TO DRINK, shower, grow gardens/ yards, water livestock, pets etc.

I recommend utilizing the work that Dr Chad Pritchard and EWUs fate and transport study recently completed where possible, as a cross-checking tool of Airport information gathering .

Until “SIA Site” has determined full extent of off property contamination, It is impossible to know how large scale the scope of work is, however that CANNOT DELAY providing safety measures (Clean Water) to down streamers Immediately, using results of testing thus far by private parties, Wa DOH, DOE and others. DO not allow PLP to wait for their own study to get complete before enforcing safety measures for affected parties .

There is no reason the POET systems should be delayed in any way as many (100s) parties have demonstrated for years the damage to their Health, Lifestyle, Homes and for some resulting inability to generate income by safely raising gardens, livestock and other food sources for the community and their own families. We are not “Complete again” until every water spigot provides ‘clean PFAS FREE water at our properties, this includes homes, garden, sprinkler systems, farm use and others.

The long term plan (PLP) must make ALL affected parties restored to prior contamination water conditions. This includes installation of filtration systems, sheds and other requirements needed and also provide all maintenance and upkeep of any filtration systems, shed , heat etc in perpetuity at no cost to Property owner. This provision needs to be transferable to any new property owners in succession until such time as raw water is safe without a PFAS filtration system in place on location. This likely is decades of responsibility.

Some Property owners have waited years for responsible party help ,getting NONE they have put out thousands of dollars of there own to attempt to mitigate by installing PFAS Filtration . These systems we are told now will not be reimbursable for installation costs or maintenance of system . These parties need to be compensated by PLP for said costs , and likely would be a cost saving measure for PLP by not having to install new system.

## Ecology’s response

Thank you for your comments and appreciation of our work. We understand your frustration about separate entities being responsible for areas of contamination, and the disparity that may exist with this scenario. Unfortunately, this system is an unavoidable product of how state and federal cleanup laws are structured.

Ecology will use many historical technical documents and the area-wide groundwater study as resources when we evaluate impacts from cleanup sites on the West Plains. The emergency interim actions require the responsible parties to provide clean drinking water and private well

sampling to all residents and businesses within the interim action area in the short term, and to provide POET systems or municipal water connection to residents and businesses with private wells above safe drinking water standards in the long term. We expect POET systems to treat all water from impacted wells, including water used for gardening and livestock. The responsible parties are required to operate and maintain the POET systems installed under the emergency interim action, regardless of current or future property ownership.

Unfortunately, you are correct that Ecology doesn't have the authority to require responsible parties to compensate impacted residents for past expenses. To recover the costs of installing and maintaining a water filtration system you purchased, we recommend you speak to a lawyer. You could seek reimbursement under a separate private action.

## **Katelynn Scott, Spokane Riverkeeper, received online March 9**

I submit these comments on behalf of Spokane Riverkeeper. We appreciate the opportunity to provide comments on the Spokane International Airport Agreed Order (No. DE 24355) and associated Public Participation Plan. Spokane Riverkeeper is a non-profit advocacy organization dedicated to protecting and restoring the health of the Spokane River watershed.

Spokane Riverkeeper supports the Spokane International Airport Agreed Order's commitment to thorough site investigation and remediation. We particularly support the proactive engagement with local homeowners and stakeholders, as well as efforts to identify and address potential contamination of private wells. Ensuring that these investigations are comprehensive and protective of both residential water supplies and the Spokane River watershed is essential to the success of the cleanup and to safeguarding public health.

### **Protecting the Spokane River & the Communities that Rely on it**

Our primary concern is the ongoing health of the Spokane River and its tributaries. The river provides critical habitat for fish and other aquatic life, supports recreational opportunities, and sustains communities with deep cultural and subsistence connections. PFAS contaminants are persistent, bioaccumulative, and capable of transforming over time into derivatives that may be overlooked if monitoring focuses solely on historical compounds used on the site and water resources contained within the developed area. Ensuring the Spokane River is protected from existing and future contamination must be central to AO implementation.

One of the most direct pathways for PFAS exposure to humans is through fish consumption. PFAS bioaccumulate in fish tissue, meaning concentrations in fish are often far higher than in surrounding water. Even a single serving of contaminated fish can result in PFAS exposure equivalent to consuming a month of water at 0.1 ppt (Barbo et al., 2023). The Freshwater Fish Contaminant Monitoring Program (FFCMP23, 2023) measured PFOS and PFOA in largescale suckers and mountain whitefish from multiple Spokane River locations, with PFOS reaching up to 48.5 ppb in suckers at Ninemile Dam. Applying Washington State fish consumption guidance derived from Lake Washington, and the above study, these concentrations indicate potential risk for subsistence fishers, including tribal members and food-insecure households.

The AO should require investigations to address contaminants that directly affect human health including fish consumption as it relates to surface water contamination. Additionally, AO tasks related to site characterization, contaminant pathway analysis, and remedial planning should include assessments of bioaccumulative compounds, incorporate surface water and aquatic life monitoring, and account for transformed or derivative PFAS chemicals. Failure to integrate these human health exposure pathways would leave the most affected communities at risk and compromise the protective intent of the AO.

### **Legacy and Modern Contamination Pathways**

PFAS contamination in the West Plains stems primarily from historic industrial operations near Spokane International Airport and Fairchild Air Force Base. Over decades, these activities created legacy plumes in groundwater, which are now surfacing in tributaries such as Mystic Springs and Garden Springs before entering the Spokane River.

In addition, the full extent of contamination depends on both current and historical infrastructure. Stormwater and sewer systems at the airport and surrounding industrial areas have shifted over decades, and legacy pipes or drainage features may still carry PFAS into nearby creeks and the Spokane River. A comprehensive assessment must consider not only modern discharge points but also historical pathways where chemicals may persist or transform in the environment, ensuring that cleanup addresses all potential sources of exposure.

While addressing these legacy sources is complex and costly, the problem is made worse by modern, preventable inputs, such as PFAS in wastewater and biosolids. Recent monitoring by Spokane Riverkeeper as part of a national Waterkeeper Alliance study (2025) demonstrates that wastewater and biosolids programs are additional sources of PFAS contamination. Samples taken upstream and downstream of the Riverside Park Water Reclamation Facility showed downstream PFAS concentrations increased by 383% (4.76 ppt). Passive sampling downstream of biosolids application fields along Dagoon Creek revealed a 5,120% increase (32.26 ppt), with PFOA exceeding federal health thresholds.

Wastewater from homes and businesses across the West Plains is ultimately collected and treated at the Riverside facility. Where wells are contaminated with PFAS, the water used in those homes and businesses is contaminated as well. That same water leaves the property through septic systems and is conveyed to the Riverside treatment plant. In practical terms, every property on the West Plains with a contaminated well is also sending PFAS-contaminated wastewater into this system. Because conventional wastewater treatment does not remove PFAS, these compounds can persist in treated effluent and biosolids, providing another pathway for PFAS associated with airport releases to move through regional infrastructure and ultimately reach the Spokane River.

### **AO Compliance and Remediation Considerations**

The AO (Scope of Work, Task 2) requires a thorough site investigation. We urge Ecology to ensure this evaluation includes not only current infrastructure but also historical stormwater and wastewater pathways, as well as potential subsurface conduits that could allow PFAS

migration into surface waters. Task 4, remedial design and implementation, must be capable of addressing both current contamination and future migration. PFAS transformation products should also be considered to prevent gaps in accountability due to chemical changes over time.

## Recommendations

1. Evaluate historical and modern infrastructure pathways to identify all potential contamination routes.
2. Incorporate surface water and fish tissue monitoring to assess PFAS bioaccumulation and exposure risks (FFCMP23, 2023; Barbo et al., 2023; Waterkeeper Alliance, 2025).
3. Apply precautionary measures for transformed PFAS compounds, not just the original chemicals.
4. Maintain transparent public reporting of all monitoring and remediation activities in line with the AO Public Participation Plan.

## Conclusion

The Spokane River receives PFAS from legacy contamination on the West Plains as well as ongoing wastewater and biosolids inputs. The Agreed Order should ensure that cleanup and investigation activities fully consider potential impacts to the river and its tributaries, rather than stopping at the river's edge. By comprehensively assessing surface waters and infrastructure that impacts surface waters, the AO can better protect both ecological and human health while ensuring that the Spokane River is not overlooked in the cleanup process.

## Ecology's response

Thank you for your comments and recommendations. The remedial investigation will evaluate all potential historical and current contaminant pathways, which will include determining whether surface water is impacted. If impacts to surface water are confirmed, remedial actions will be required to address these impacts.

All data and reports required by the Enforcement and Agreed orders will be available to the public on our [SIA PFAS webpage](#).

## Albert Tripp, City of Airway Heights Manager, received online March 9

I am the City Manager of the City of Airway Heights ("Airway Heights", or "the City"), a municipality located in Spokane County and neighboring the City of Spokane and the Spokane International Airport ("SIA"). Thank you for the opportunity to comment on the Department of Ecology's ("Ecology") Agreed Order No. DE 24355 (the "AO"), regarding Spokane County's, and the City of Spokane's joint responsibility for undertaking investigative and remedial actions for per- and polyfluoroalkyl substances ("PFAS") contamination originating at the airport.

I would also like to thank Ecology for its assistance as the City navigates ongoing challenges related to PFAS contamination in our drinking water supply. Addressing PFAS contamination in the West Plains will require coordination between federal, state and local entities, and we welcome the opportunity to partner with Ecology. The comments below include suggestions on

how Ecology can use its supervisory authority under the AO to drive optimal remediation of PFAS contamination in and around SIA.

**Comment #1: Ensure that remedial investigations comprehensively evaluate the potential geographic migration of PFAS from SIA and other sources.**

Given the complex hydrogeology of the West Plains and PFAS contamination from Fairchild Air Force Base (“Fairchild”), we request that Ecology coordinate the SIA PFAS investigation with the ongoing federal efforts to address PFAS contamination originating from Fairchild. Fairchild has already been identified as the source of significant PFAS contamination in municipal and private wells in Airway Heights and other surrounding communities, but further investigation is needed.

As stated in prior comments, the City remains particularly interested in greater information about PFAS contamination to the Spokane Valley/Rathdrum Prairie Aquifer. To meet the City’s need for uncontaminated water, the City sought authorization to drill a new municipal well near the crossing of Seven Mile Road over the Spokane River (“New Well”). These plans have remained paused since sampling during the well planning process detected PFAS in that water source. We thank Ecology for its earlier commitment to a remedial investigation that determines whether the SIA contamination plume has reached the area of the proposed New Well.

**Comment #2: Ensure that the sampling regime requires comprehensive PFAS sampling at detection limits below regulatory standards.**

The remedial investigations under the AO should also align with regulatory standards. Both the United States Environmental Protection Agency (“EPA”) and Ecology have developed drinking water standards for several PFAS chemicals, with federal maximum contaminant levels (“MCLs”) and Washington State Action Levels (“SALs”) set at the following limits:

- PFOA and PFOS: 4 parts per trillion (ppt)
- PFHxS, PFNA, and HFPO-DA (GenX chemicals): 10 ppt
- Mixtures containing two or more of PFHxS, PFNA, HFPO-DA, and PFBS: Hazard Index of 1.

As a result, sampling efforts under the AO should use a detection threshold of at least 4 ppt or risk inadequately or inaccurately analyzing PFAS impacts. Additionally, Ecology has recognized all PFAS as hazardous substances under the Model Toxics Control Act (“MTCA”).

Currently, Ecology plans to require sampling for 40 analytes under EPA Method 1633. If approved methodology for a wider range of PFAS becomes available, Airway Heights requests that Ecology amend the sampling protocol to require testing for additional PFAS chemicals. A comprehensive sampling regime is necessary to gather data that fully scopes the complex and long-term problem of contamination in the West Plains.

### **Comment #3: Grant the City access to reports and data.**

The workstreams required by the AO will produce several deliverables and significant amounts of data regarding PFAS contamination at SIA and in the surrounding area. As a neighboring city and water user whose water sources are contaminated by PFAS, Airway Heights has a deep interest in the results of all investigations and plans for remedial work in the West Plains. The City requests copies of all deliverables generated under the AO and the prior Enforcement Order, as well as formal notification regarding opportunities for public engagement in the remedial action planning process. Most importantly, we request that Ecology actively involve Airway Heights in planning any interim or final remedial actions that might address PFAS impacts to our drinking water sources, including the Columbia River Basalt Group paleochannel aquifer system and the Spokane Valley/Rathdrum Prairie Aquifer.

Thank you again for the opportunity to comment on the proposed AO regarding the investigation and remediation of PFAS in the West Plains. Airway Heights is grateful for Ecology's work on this important issue, and the City will look to provide assistance wherever possible.

### **Ecology's response**

Thank you for your comments and desire to be involved in the cleanup process.

1. Ecology site managers continually coordinate with EPA on Fairchild's remedial investigation. As the Fairchild and SIA investigations move forward, we will continue to coordinate.
2. We have and will continue to ensure all detection limits for PFAS with a regulatory standard in groundwater and soil will be below the applicable standard.
3. All data and reports required by the Enforcement and Agreed orders will be available to the City of Airway Heights. In addition, the city will have the opportunity to provide input on the interim actions, the remedial investigation report, the feasibility study report, and the draft cleanup action plan. As always, we welcome input from the city at any time in the cleanup process, and we are happy to participate in update meetings as necessary.

# Appendix

## Attachments to JE McHugh's comments

# PFAS in the West Plains

PFAS “forever chemicals” are human-made substances found in many everyday products like some commercial waterproofing and non-stick products, packaging, waxes, paints, and historic industrial firefighting foams. They are very hard to break down, so once they get into soil or water, they stay there for a long time. Over time, PFAS can build up in the environment, in drinking water, and even in living things. High levels of PFAS have been linked to various health problems.

## What You Can Do

**Stay informed:** Visit the WA Department of Health or Department of Ecology websites (lower right).

**Limit exposure:** Avoid known sources of PFAS. Boil with filtered water, boiling can concentrate toxics.

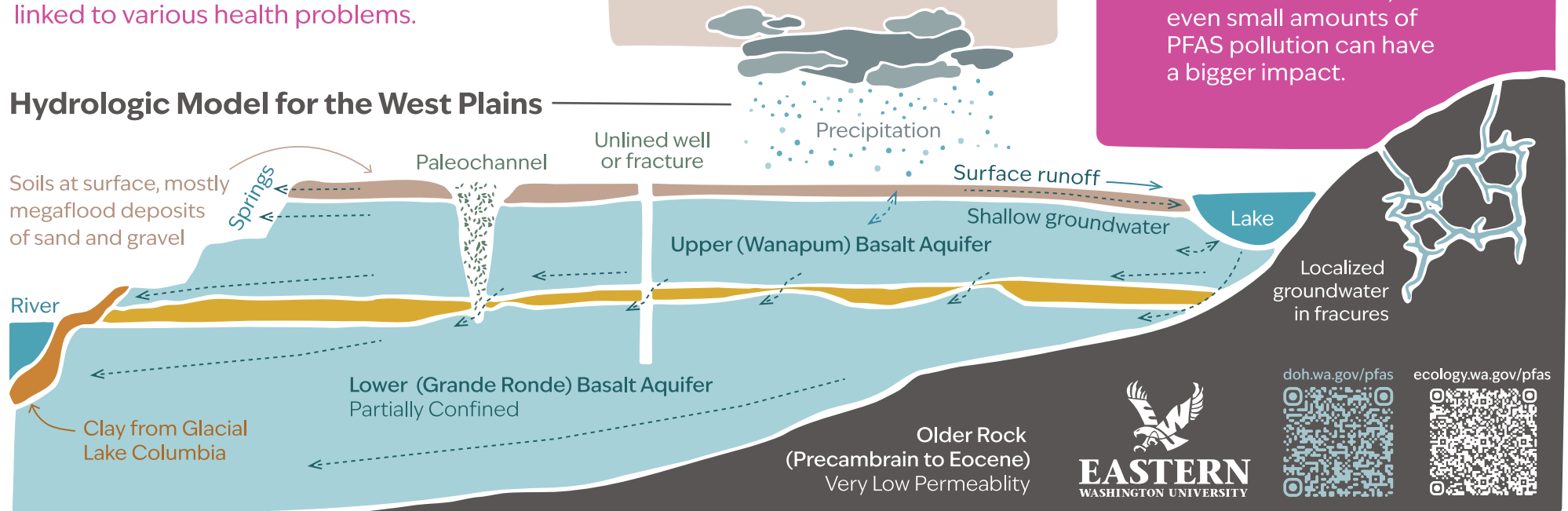
**Speak up:** Advocate for cleanup, testing, & more considerate land development. Work with government or non-profit agencies. Talk with neighbors.

## Why This Matters

### *West Plains Aquifers are Declining*

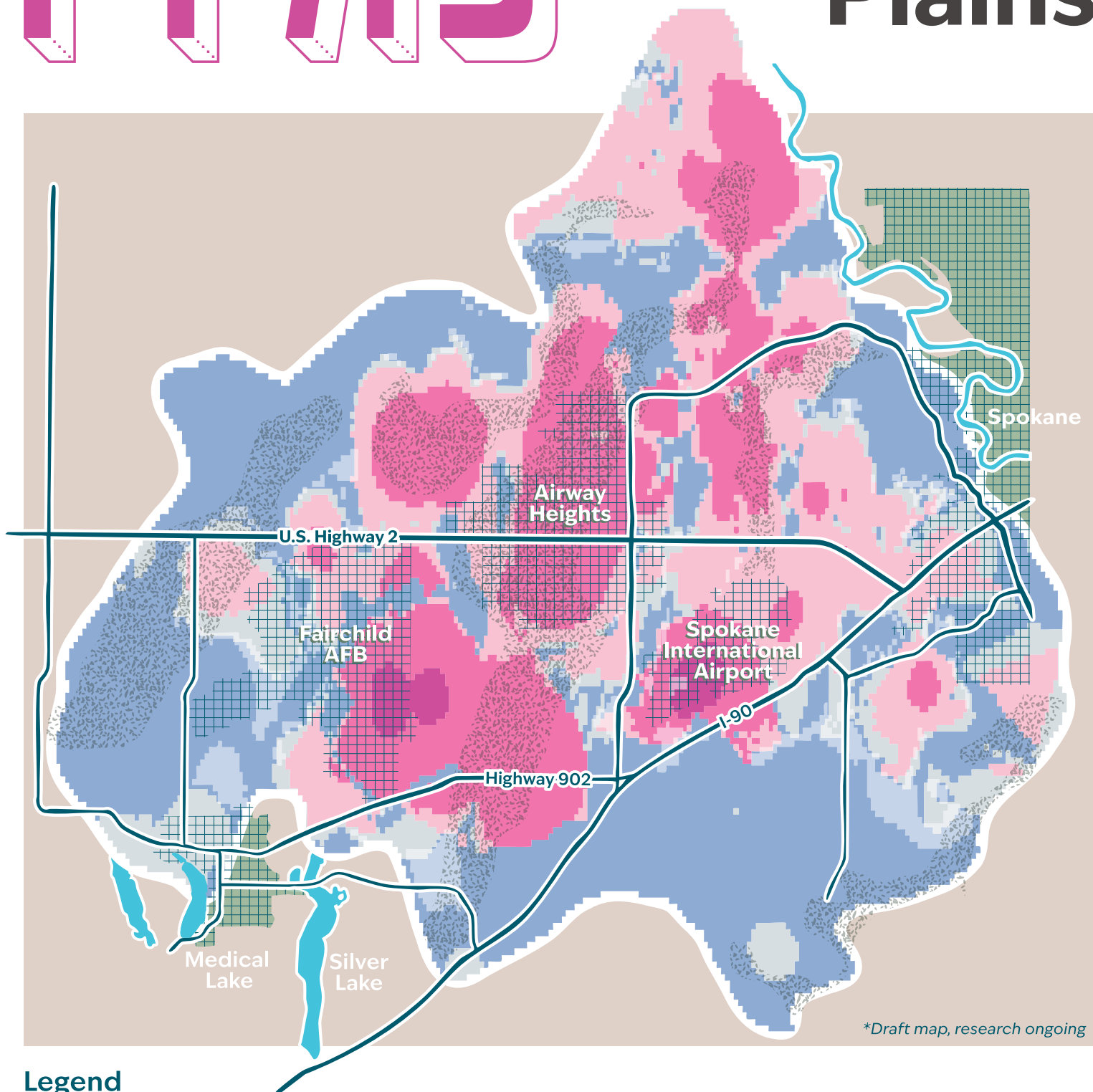
- In the West Plains, aquifers are losing water because people are using more than nature can replace.
- The aquifers now depend more on rain and snow to refill, but warm/dry years are making that difficult.
- Development adds roads, parking lots, and buildings, which block rain and snow from soaking into the ground and refilling the aquifer.
- With less water underground, there is less dilution, so even small amounts of PFAS pollution can have a bigger impact.

## Hydrologic Model for the West Plains



# PFAAS

in the **West  
Plains**

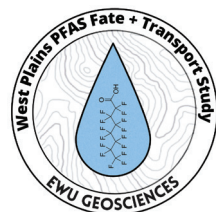


## Legend

-  Municipal Boundaries
-  Bodies of Water
-  Paleochannels
-  Outside Testing Zone

## General PFOS Detected at Regional Scale (parts per trillion)

- |                                                                                                  |                                                                                           |
|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
|  2,000-20,051 |  4-9.9 |
|  70-1999.9    |  0-3.9 |
|  10-69.9      |                                                                                           |



**State Environmental Policy Act (SEPA)  
ENVIRONMENTAL CHECKLIST**

File No. \_\_\_\_\_

**PLEASE READ CAREFULLY BEFORE COMPLETING THE CHECKLIST!**

**Purpose of Checklist:**

The State Environmental Policy Act (SEPA) chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An Environmental Impact Statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

**Instructions for Applicants:**

This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or give the best description you can.

You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply." Complete answers to the questions now may avoid unnecessary delays later.

Some questions ask about governmental regulations, such as zoning, shoreline, and landmark designations. Answer these questions if you can. If you have problems, the governmental agencies can assist you.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

**Use of checklist for nonproject proposals:**

Complete this checklist for nonproject proposals, even though questions may be answered "*does not apply*."

IN ADDITION, complete the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (Part D).

For nonproject actions, the references in the checklist to the words "project," "applicant," and "property or site" should be read as "proposal," "proposer," and "affected geographic area," respectively.

## A. BACKGROUND

1. Name of proposed project: ***Pacific Northwest Technology Park – East Pond, Conveyance Ditch and Drywell Farm***
2. Applicant: ***DCI Engineers/Wade Gelhausen, P.E.***
3. Address: ***707 W 2<sup>nd</sup> Avenue***  
City/State/Zip: ***Spokane, WA 99201*** Phone: ***(509) 455-4448***  
  
Agent or Primary Contact: ***DCI Engineers/Wade Gelhausen, P.E.***  
Address: ***707 W 2<sup>nd</sup> Avenue***  
City/State/Zip: ***Spokane, WA 99201*** Phone: ***(509) 455-4448***  
  
Location of Project: ***South of US-2, north of Airport Drive, east of Technology Blvd, west of Spotted Road***  
Address: ***No address is assigned at this time***  
Section: ***29*** Quarter: ***NW & NE*** Township: ***T25N*** Range: ***R42E***  
Tax Parcel Number(s): ***25291.9062 and 25292.0304***
4. Date checklist prepared: ***2/1/2024***
5. Agency requesting checklist: ***City of Spokane***
6. Proposed timing or schedule (including phasing, if applicable):  
  
***The initial design for the east pond (re-grading), conveyance ditch, and drywell farm has been completed and is currently in review with the city of Spokane. Construction is expected to start in the spring of 2024.***
7. a. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.  
  
***No additional projects are directly associated with this proposal. This project will allow for future development to occur within the Pacific Northwest Technology Park (PNWTP) by providing additional stormwater conveyance, detention, and disposal capacities from these developments flowing into the area designated under this SEPA. Future developments within PNWTP will need to complete their own SEPAs as required.***  
  
b. Do you own or have options on land nearby or adjacent to this proposal? If yes, explain.  
  
***There is currently about 130-acres of vacant land within the PNWTP that could be developed in the future from which stormwater could be conveyed to this SEPA project property. Granite Investments, LLC has generally overseen the planning throughout the development and managed the stormwater system. Granite Investments, LLC has an agreement in place with West Plains Development, LLC, to purchase this SEPA project's property prior to construction commencing for this project.***
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

***The PNWTP – East Pond Re-Grading, Conveyance Ditch & Drywell Farm drainage report,***

***prepared by DCI Engineers, dated December 20, 2023, was completed for this project to describe the design and usage of the Drywell Farm for the PNWTP development. This report refers to four other stormwater reports that have been utilized and completed previously. See the list below for a list of reports associated with this development:***

- ***Conceptual Drainage Plan - Drywell Farm on SIA Property for Pacific Northwest Technology Park  
By: Hahn Engineering  
Dated: 3/11/2002***
- ***Stormwater Design Report for Deer Creek Apartments and Stormwater Master Plan for Granite Investments Properties West of Flint Road  
By: DCI Engineers  
Dated: 3/14/2006***
- ***Stormwater Design Report for Pacific Northwest Technology Park - Master Drainage Report  
By: DCI Engineers  
Dated: 8/6/2009***
- ***Stormwater Supplement for Pacific Northwest Technology Park Selkirk Pharma Development  
By: DCI Engineers  
Dated: 4/28/2021***

***A Geotechnical and Hydrogeologic Engineering Report, prepared by Budinger & Associates, dated July 21, 2023, was completed to address the suitability of the site to support the drywell farm and determine the design infiltration rates for the proposed area. The drywell farm will be located over an area commonly referred to as the Airport Paleochannel. This paleochannel is essentially an underground basin that drains to the north and ultimately empties into the Spokane River valley, and it is anticipated that there will be no downgradient impacts from the proposed infiltration facility. It is anticipated that double-depth drywells infiltrating at a design rate of 1.0-cfs will be feasible.***

***A Wetland Delineation Report, prepared by Biology Soil and Water Inc, dated August 17, 2023, was completed to define a wetland in the northwest corner of the West Plain Development's property. This wetland is described and included in the previously mentioned, PNWTP – East Pond Re-Grading, Conveyance Ditch & Drywell Farm drainage report. This wetland will not be affected as part of this project and protection measures have been called out to protect this wetland and its required buffer.***

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

***None known.***

10. List any government approvals or permits that will be needed for your proposal, if known.

***City of Spokane Permit: Engineering Permit for grading/stormwater design.***

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page.

***This project proposes to construct the final stormwater disposal facilities necessary to handle stormwater runoff from the Pacific Northwest Technology Park (PNWTP), a 225-acre development as summarized in the PNWTP Drywell Farm Drainage Report by DCI Engineers,***

- No addresses are currently assigned to the properties; the east pond is located on parcel 25292.0304 and the conveyance ditch connects to the east pond and flows east onto parcel 25291.9062 where the drywell farm is proposed. Please see vicinity map below.***



- 4 OF 21

Overlay Zone Atlas for boundaries.)

***The site is located within the City of Spokane and in the General Sewer Service Area. The site is not located within the Aquifer Sensitive Area.***

14. The following questions supplement Part A.

a. Critical Aquifer Recharge Area (CARA) / Aquifer Sensitive Area (ASA)

- (1) Describe any systems, other than those designed for the disposal of sanitary waste installed for the purpose of discharging fluids below the ground surface (includes systems such as those for the disposal of stormwater or drainage from floor drains). Describe the type of system, the amount of material to be disposed of through the system and the types of material likely to be disposed of (including materials which may enter the system inadvertently through spills or as a result of firefighting activities).

***The project doesn't plan to discharge any waste fluids into the ground.***

- (2) Will any chemicals (especially organic solvents or petroleum fuels) be stored in aboveground or underground storage tanks? If so, what types and quantities of material will be stored?

***To the best of our knowledge, there are currently no anticipated toxic or hazardous chemicals that might be stored or used at the proposed development for the east pond, conveyance ditch or drywell farm.***

- (3) What protective measures will be taken to ensure that leaks or spills of any chemicals stored or used on site will not be allowed to percolate to groundwater. This includes measures to keep chemicals out of disposal systems.

***To the best of our knowledge, there are currently no anticipated toxic or hazardous chemicals that might be stored or used at the proposed development for the east pond, conveyance ditch or drywell farm. If chemicals are planned to be stored or used on site, a Spill Prevention, Control, and Countermeasure (SPCC) plan should be created. A spill kit should be kept on site at all times and crews should be trained on reporting and cleanup procedures.***

- (4) Will any chemicals be stored, handled, or used on the site in a location where a spill or leak will drain to surface or groundwater or to a stormwater disposal system discharging to surface or groundwater?

***To the best of our knowledge, there are currently no anticipated toxic or hazardous chemicals that might be stored or used at the proposed development for the east pond, conveyance ditch or drywell farm.***

b. Stormwater

- (1) What are the depths on the site to groundwater and to bedrock (if known)?

***In the geotechnical report by Budinger and Associates, dated July 21, 2023, groundwater was encountered in one bore beginning at 38.3 feet below ground surface (BGS). In the report it is noted that, "local groundwater, other than that which forms thin, discontinuous, unconfined aquifers above impermeable soil and rock formations near the ground surface,***

***is typically encountered as confined aquifers within the interbedded basalt strata that extend to depths greater than 500 feet beneath the site.” Depth to bedrock was not determined, however depth to fractured basalt was found in one bore beginning at 22 feet BGS and extended to greater than 40 feet BGS. It is anticipated that groundwater near the ground surface in the vicinity of the site results from upgradient surface water that infiltrates permeable soil overlying impermeable strata and moves laterally into the paleochannel.***

- (2) Will stormwater be discharged into the ground? If so, describe any potential impacts.

***Stormwater will be discharged into the ground at this project site. The stormwater discharge will come from the various connected sites in the PNWTP will be infiltrated into the ground with this project as outlined in stormwater reports completed as part of this project. No additional stormwater runoff from impervious surface is proposed in direct result of this project.***

## **B. ENVIRONMENTAL ELEMENTS**

### **1. Earth**

- a. General description of the site (check one):

☒ Flat   ☐ Rolling   ☐ Hilly   ☐ Steep slopes   ☐ Mountainous

Other: ***N/A***

- b. What is the steepest slope on the site (approximate percent slope)?

***The steepest slope on site will be approximately 33% (3:1) at limited locations to tie into existing grade. The conveyance ditch will have side slopes of 25% (4:1) with the conveyance flow line having slopes ranging from approximately 0.5% to 5%.***

- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long- term commercial significance and whether the proposal results in removing any of these soils.

***Based on the Geotechnical Engineering Report, by Budinger and Associates dated July 21, 2023, the existing subsurface consists of silty soil extending to depths ranging from 2' to 6', underlain by permeable soil ranging from 6' to 9', underlain by basalt beginning at 22' and extending to greater than 40' BGS.***

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

***To our knowledge, there are no surface indications or history of unstable soils in the immediate vicinity.***

- e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill:

***The anticipated disturbed project area for the regrading of the existing east pond, proposed storm pipe, conveyance ditch, drywell farm and associated maintenance road construction is approximately 3.5 acres (a total of approximately 1,500 linear feet of conveyance ditch). The***

**proposed construction will require clearing and grubbing, topsoil removal, and earthwork trenching and grading. A total earthwork volume of 5,250 cubic yards is anticipated for this work (approximately 4,870 CY of cut and approximately 380 CY of fill). Fill will primarily consist of road base gravel from a local gravel pit.**

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

**Erosion could occur as a result of clearing and construction grading. However, the site is relatively flat and all proposed construction activity within the project site will have erosion control measures outlined in the plans that the contractor will need to follow to prevent erosion from occurring.**

- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt, or buildings)?

**None.**

- h. Proposed measures to reduce or control erosion or other impacts to the earth, if any:

**Implementation of erosion control measures are proposed during construction primarily consists of sediment barriers (silt fencing and inlet protection). Long term erosion will be controlled by re-vegetation and hardscape (gravel road).**

## **2. Air**

- a. What type of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

**The emissions from the site will be for general construction activities. Additional emissions upon the completion of the project are not expected.**

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

**We do not believe that there will be any off-site sources of emissions or odor that affect the proposal.**

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

**Dust control measures for earthwork will be enforced during construction. Regular maintenance of construction equipment will also be required.**

## **3. Water**

- a. SURFACE WATER:

- (1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

***There is no surface water body on or in the immediate vicinity of the site.***

- (2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

***None.***

- (3) Estimate the amount of fill and dredge material that would be placed in or removed from the surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

***None.***

- (4) Will the proposal require surface water withdrawals or diversions? If yes, give general description, purpose, and approximate quantities if known.

***None.***

- (5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

***The proposal does not lie within a 100-year floodplain.***

- (6) Does the proposal involve any discharge of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

***No, the project doesn't discharge any waste materials to surface waters.***

b. GROUNDWATER:

- (1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

***The project doesn't plan to withdraw any groundwater.***

- (2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

***The project doesn't plan to discharge waste material into the ground.***

c. WATER RUNOFF (INCLUDING STORMWATER):

- (1) Describe the source of runoff (including stormwater) and method of collection and disposal if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

***No additional stormwater runoff will be generated directly from this project. Stormwater***

**runoff from the PNWTP will flow from the re-graded east pond to the conveyance ditch and ultimately infiltrate in the drywell farm. The maximum capacity for the conveyance ditch is 96.10-cfs. Stormwater is not expected to flow into other waters and has been designed for a 100-year storm event. According to the geotechnical report included in the Master Drainage Report, some infiltration will occur in the drainage channels.**

- (2) Could waste materials enter ground or surface waters? If so, generally describe.

**We do not believe that waste materials could enter the ground or surface waters as a result of this project.**

- (3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

**The proposed construction for the project will provide a continuation of existing drainage patterns through the property in conjunction with the master drainage system for the PNWTP. This project will positively impact the drainage patterns for the surrounding properties that are connected to the PNWTP to allow for infiltration of larger storm events.**

- d. PROPOSED MEASURES to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any.

**A storm water management system will be designed and constructed for the individual parcels as they are developed by prospective tenants/buyers to manage all on-site storm water runoff that will ultimately be tied into this stormwater infiltration project.**

#### 4. Plants

- a. Check the type of vegetation found on the site:

Deciduous tree: ☐ alder ☐ maple ☐ aspen

Other: **None.**

Evergreen tree: ☐ fir ☐ cedar ☐ pine

Other: **None.**

☒ Shrubs ☒ Grass ☐ Pasture ☐ Crop or grain

☐ Orchards, vineyards or other permanent crops

Wet soil plants: ☐ cattail ☐ buttercup ☐ bullrush ☐ skunk cabbage

Other: **None.**

Water plants: ☐ water lily ☐ eelgrass ☐ milfoil

Other: **None.**

Other types of vegetation: **None.**

- b. What kind and amount of vegetation will be removed or altered?

**Mainly grasses and a few shrubs will be removed.**

- c. List threatened and endangered species known to be on or near the site.

***We do not know of any threatened or endangered species on or near the site.***

- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

***Dryland grass will be planted upon completion of the project for revegetation of the site.***

- e. List all noxious weeds and invasive species known to be on or near the site.

***We do not know of noxious weeds or invasive species on the site.***

## 5. Animals

- a. Check and List any birds and other animals which have been observed on or near the site or are known to be on or near the site:

Birds: ☒ hawk ☐ heron ☐ eagle ☒ songbirds

Other: ***None.***

Mammals: ☒ deer ☐ bear ☐ elk ☐ beaver

Other: ***None.***

Fish: ☐ bass ☐ salmon ☐ trout ☐ herring ☐ shellfish

Other: ***None.***

Other (not listed in above categories): ***None.***

- b. List any threatened or endangered animal species known to be on or near the site.

***We do not know of any endangered or threatened species on or near the site.***

- c. Is the site part of a migration route? If so, explain.

***We are not aware of this site being part of a migration route.***

- d. Proposed measures to preserve or enhance wildlife, if any:

***There are currently no anticipated measures in place to preserve or enhance wildlife.***

- e. List any invasive animal species known to be on or near the site.

***We do not know of any invasive animal species on near the site.***

## 6. Energy and natural resources

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

***There are no energy needs expected for this project.***

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

***This project will not have adverse effects for solar use of adjacent properties.***

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

***There are no energy conservation features proposed for this project.***

## **7. Environmental health**

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, describe.

***There are currently no known health hazards for the site.***

- (1) Describe any known or possible contamination at the site from present or past uses.

***We do not know of any contaminations on the site, but if found, the project team will work to mitigate any issues.***

- (2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

***We do not know of any existing hazardous chemicals/conditions on the site.***

- (3) Describe any toxic or hazardous chemicals/conditions that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

***To the best of our knowledge, there are currently no anticipated toxic or hazardous chemicals that might be stored at the proposed development for the east pond, conveyance ditch or drywell farm.***

- (4) Describe special emergency services that might be required.

***We do not anticipate the need for special emergency services.***

- (5) Proposed measures to reduce or control environmental health hazards, if any:

***No measures are proposed to reduce or control environmental health hazards at this time. However, if any hazardous materials that may be encountered would be removed by a qualified abatement contractor in accordance with State and Federal guidelines.***

- b. NOISE:

- (1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

***The project understands there is existing noise from the existing air traffic around the site due to the proximity of the Spokane International Airport and Fairchild Air Force Base.***

- (2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

***In the short term, noise will be generated from general construction. Upon completion of the project, no long-term noises are anticipated.***

- (3) Proposed measure to reduce or control noise impacts, if any:

***The proposed project would comply with the City of Spokane Noise Ordinance, specifically that construction hours would be limited to weekdays (non-holidays) from 7AM to 10PM and Saturdays and Sundays from 9AM to 10PM.***

## 8. Land and shoreline use

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

***The site is currently undeveloped, the adjacent properties to the project site are commercial buildings to the north and there is more undeveloped land in all other directions. The proposal will not affect land uses on the adjacent or nearby properties.***

- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

***None known.***

- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

***The proposal will not affect or be affected by the surrounding working farm or normal business operations.***

- c. Describe any structures on the site.

***None.***

- d. Will any structures be demolished? If so, which?

***No structures will be demolished.***

- e. What is the current zoning classification of the site?

***The current zoning classification of the properties is LI (Light Industrial).***

- f. What is the current comprehensive plan designation of the site?

***The current comprehensive plan designation for the site is LI (Light Industrial).***

- g. If applicable, what is the current shoreline master program designation of the site?

***There is no shoreline master program designation for this site.***

- h. Has any part of the site been classified as a critical area by the city or the county? If so, specify.

***Not to our knowledge.***

- i. Approximately how many people would reside or work in the completed project?

***None.***

- j. Approximately how many people would the completed project displace?

***No people would be displaced by the completion of this project.***

- k. Proposed measures to avoid or reduce displacement impacts, if any:

***None.***

- l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

***None.***

- m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:

***None.***

## **9. Housing**

- a. Approximately how many units would be provided, if any? Indicate whether high-, middle-, or low-income housing.

***No housing units are currently going to be provided.***

- b. Approximately how many units, if any, would be eliminated? Indicate whether high-, middle- or low-income housing.

***No housing units would be eliminated from the property.***

- c. Proposed measures to reduce or control housing impacts, if any:

**None.**

## 10. Aesthetics

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

***No buildings are being proposed.***

- b. What views in the immediate vicinity would be altered or obstructed?

**None.**

- c. Proposed measures to reduce or control aesthetic impacts, if any:

***No measures are currently proposed.***

## 11. Light and Glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

***This project will not produce any light or glare.***

- b. Could light or glare from the finished project be a safety hazard or interfere with views?

***This project will not produce any light or glare.***

- c. What existing off-site sources of light or glare may affect your proposal?

***We do not know of any off-site source of light or glare that would affect this project.***

- d. Proposed measures to reduce or control light and glare impacts, if any:

**None.**

## 12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity?

***Sunset Park, Shorty Combs Park, Cleveland Park and Traditions Park in Airway Heights are the closest parks to the site. All of these parks are about 3 miles away.***

- b. Would the proposed project displace any existing recreational uses? If so, describe.

***No recreation uses would be displaced.***

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

**None.**

### 13. Historic and cultural preservation

- a. Are there any buildings, structures, or sites, located on or near the sited that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe.

***None that we know of.***

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

***None that we know of.***

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archaeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

***None.***

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

***None are proposed at this time. Should ground-disturbing activities reveal any cultural materials (e.g., structural remains, European American artifacts, or Native American artifacts), activity will cease, and the required parties will be notified immediately.***

### 14. Transportation

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

***None.***

- b. Is site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

***The Spokane Transit Authority does not currently serve this area directly but does have stops within a mile of the project site. The closest stops to this area are currently located at Flint Road and Hilton Avenue and at US-2 and Flint Road.***

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

***This proposal will not provide any additional parking spaces or eliminate any parking spaces.***

- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or

state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

***This proposal will not require any improvements. A gravel maintenance road will be provided along the conveyance ditch and drywell farm for private use only.***

- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail or air transportation? If so, generally describe.

***No water, rail, or air transportation will be used during the project.***

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and non-passenger vehicles). What data or transportation models were used to make these estimates?

***None.***

*(Note: to assist in review and if known, indicate vehicle trips during PM peak, AM Peak, and Weekday (24 hours).)*

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, general describe.

***We do not believe the project will interfere with or be affected by the movement of agriculture and forest products.***

- h. Proposed measures to reduce or control transportation impacts, if any:

***None.***

## **15. Public services**

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

***We do not believe the project will increase the need for public services.***

- b. Proposed measures to reduce or control direct impacts on public services, if any:

***None.***

## **16. Utilities**

- a. Check utilities currently available at the site:

☐ electricity

☐ natural gas

- ☐ water
- ☐ refuse service
- ☐ telephone
- ☐ sanitary sewer
- ☐ septic system

Other: **None**

- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed:

**None.**

### C. SIGNATURE

I, the undersigned, swear under penalty of perjury that the above responses are made truthfully and to the best of my knowledge. I also understand that, should there be any willful misrepresentation or willful lack of full disclosure on my part, the *agency* must withdraw any determination of Nonsignificance that it might issue in reliance upon this checklist.

Date: February 5, 2024 Signature: \_\_\_\_\_

***Please Print or Type:***

Proponent: Wade Gelhausen, Principal/DCI Engineers Address: 707 W 2<sup>nd</sup> Avenue

Phone: (509) 455-4448 Spokane, WA 99201

Person completing form (if different from proponent): \_\_\_\_\_

Phone: \_\_\_\_\_ Address: \_\_\_\_\_  
\_\_\_\_\_

#### FOR STAFF USE ONLY

Staff member(s) reviewing checklist: \_\_\_\_\_

Based on this staff review of the environmental checklist and other pertinent information, the staff concludes that:

- ☐ A. there are no probable significant adverse impacts and recommends a Determination of Nonsignificance.
- ☐ B. probable significant adverse environmental impacts do exist for the current proposal and recommends a Mitigated Determination of Nonsignificance with conditions.
- ☐ C. there are probable significant adverse environmental impacts and recommends a Determination of Significance.

**D. SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS**  
***(Do not use this sheet for project actions)***

Because these questions are very general, it may be helpful to read them in conjunction with the list of elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

**N/A**

Proposed measures to avoid or reduce such increases are: **N/A**.

2. How would the proposal be likely to affect plants, animals, fish or marine life?

**N/A**

Proposed measures to protect or conserve plants, animals, fish or marine life are: **N/A**

3. How would the proposal be likely to deplete energy or natural resources?

**N/A**

Proposed measures to protect or conserve energy and natural resources are: **N/A**.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, flood plains or prime farmlands?

**N/A**

Proposed measures to protect such resources or to avoid or reduce impacts are: **N/A**

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

**N/A**

Proposed measures to avoid or reduce shoreline and land use impacts are: **N/A**

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

**N/A**

Proposed measures to reduce or respond to such demand(s) are: **N/A**

7. Identify, if possible, whether the proposal may conflict with local, state or federal laws or requirements for the protection of the environment.

**N/A**

C. SIGNATURE

I, the undersigned, swear under penalty of perjury that the above responses are made truthfully and to the best of my knowledge. I also understand that, should there be any willful misrepresentation or willful lack of full disclosure on my part, the *agency* may withdraw any Determination of Nonsignificance that it might issue in reliance upon this checklist.

Date: \_\_\_\_\_ Signature: \_\_\_\_\_

***Please Print or Type:***

Proponent: \_\_\_\_\_ Address: \_\_\_\_\_

Phone: \_\_\_\_\_

Person completing form (if different from proponent): \_\_\_\_\_

Phone: \_\_\_\_\_ Address: \_\_\_\_\_

\_\_\_\_\_

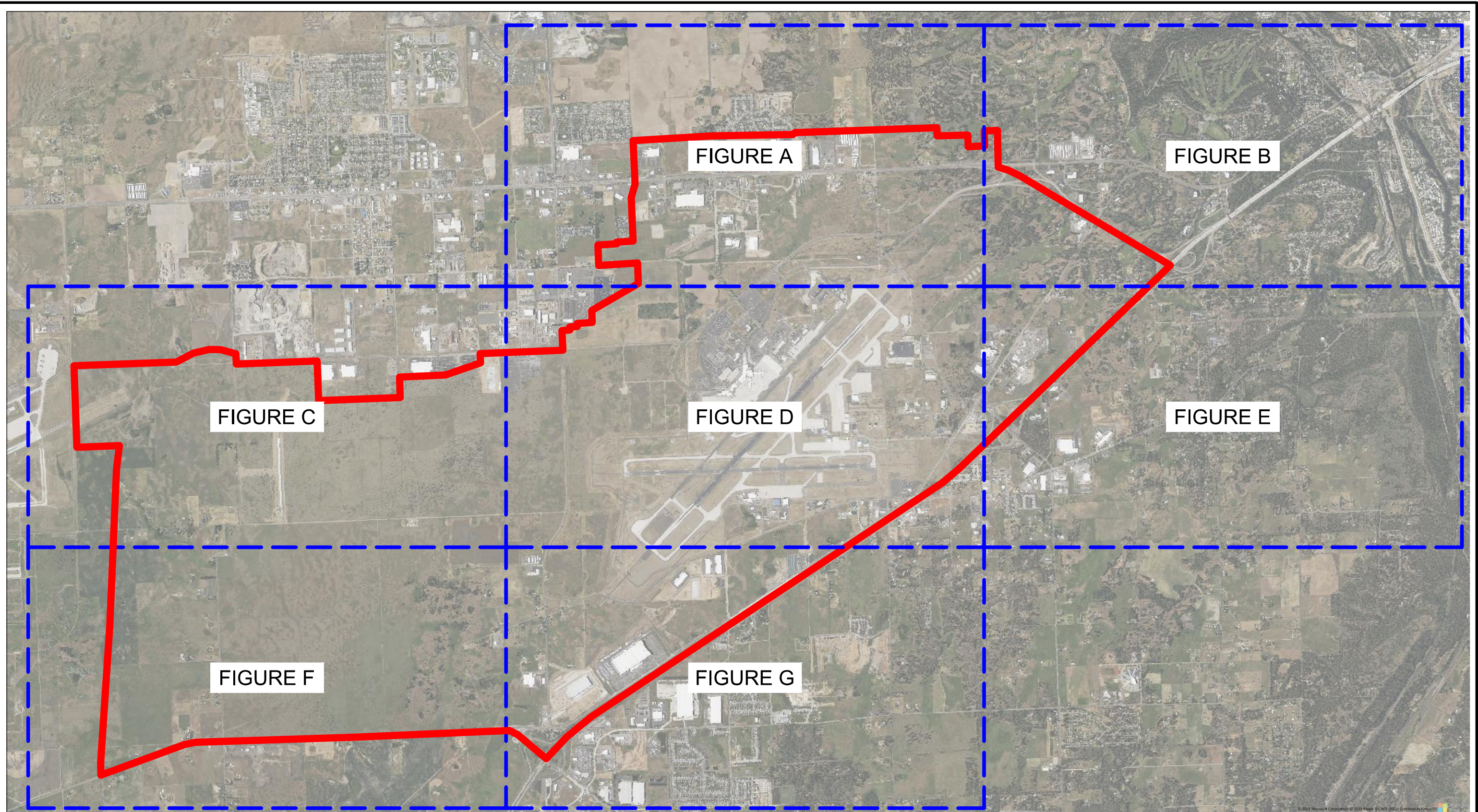
**FOR STAFF USE ONLY**

Staff member(s) reviewing checklist: \_\_\_\_\_

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- C. ☐ there are probable significant adverse environmental impacts and recommends a Determination of Significance.

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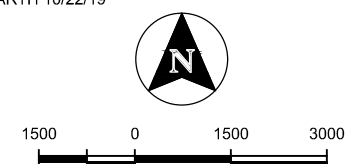


#### LEGEND

-  APPROXIMATE WEST PLAINS PDA BOUNDARY (9,200 ACRES)
-  INDEX VIEW FRAME

### WEST PLAINS PDA WETLAND INVENTORY EXHIBIT SHEET INDEX

NOTE: AERIAL IMAGE OBTAINED FROM GOOGLE EARTH 10/22/19



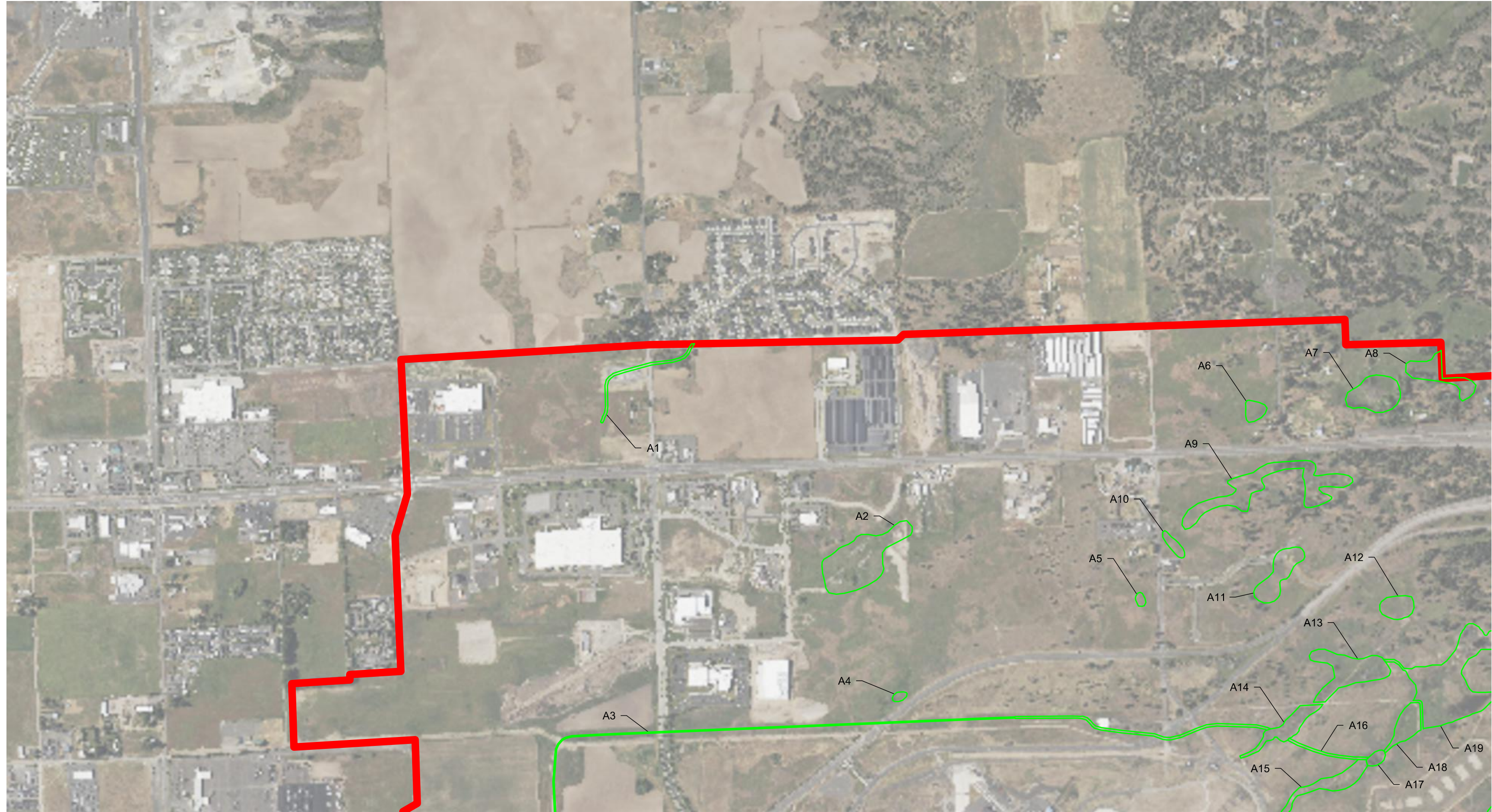
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E-FILE: PDA Wetland Inventory.dwg      DATE: 10/16/23      JOB: 190509

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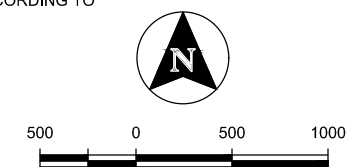


LEGEND

-  APPROXIMATE WEST PLAINS PDA BOUNDARY
-  APPROXIMATE WETLAND BOUNDARY

WEST PLAINS PDA  
WETLAND INVENTORY EXHIBIT  
FIGURE A

NOTE: ONLY WETLANDS WITHIN WEST PLAINS PDA ARE SHOWN.  
WETLAND AREAS ARE DERIVED FROM THE NATIONAL WETLAND  
INVENTORY (NWI) REFERENCE MAPS AND ADJUSTED ACCORDING TO  
VISUAL AND/OR SITE OBSERVATIONS.



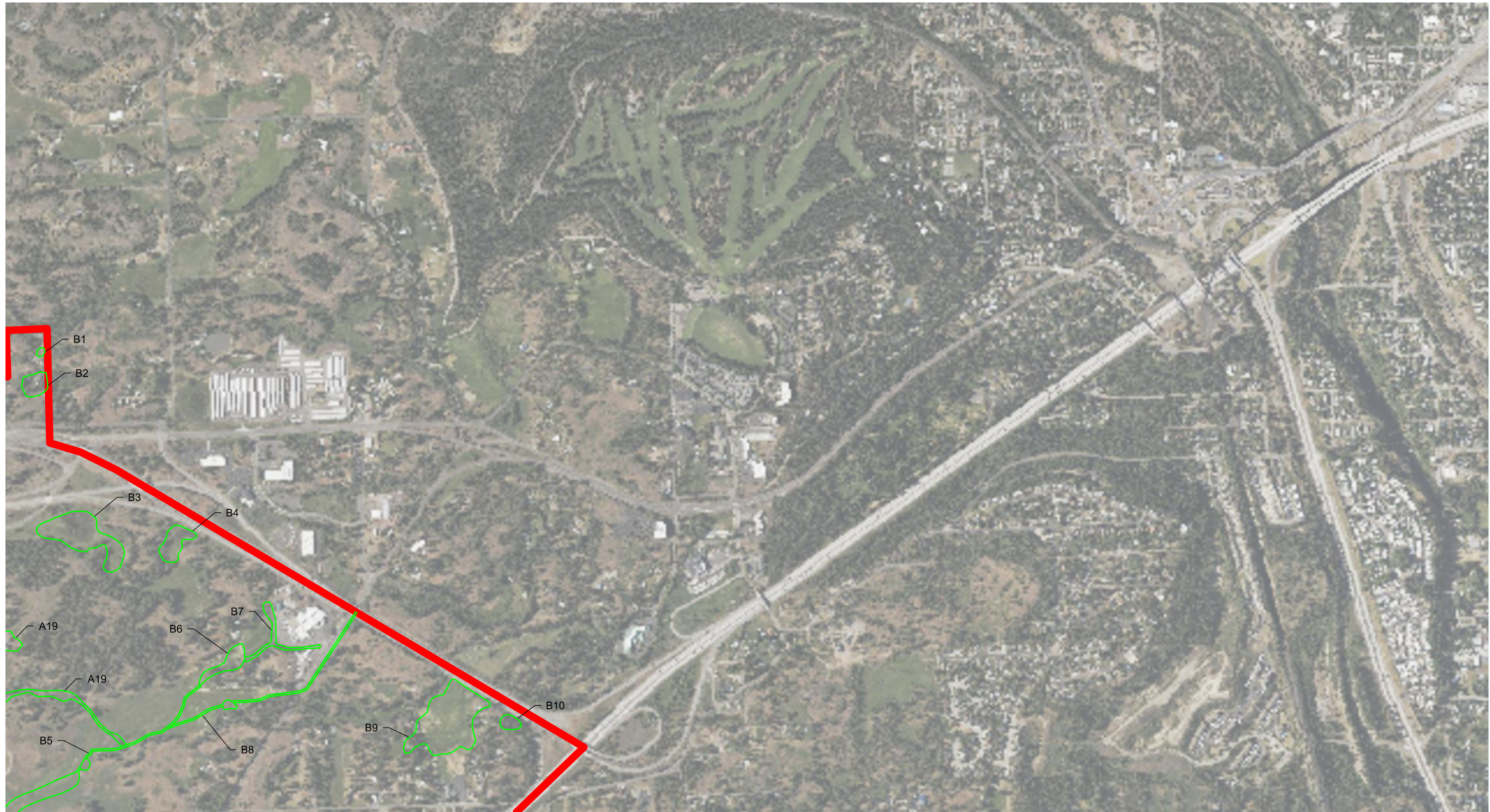
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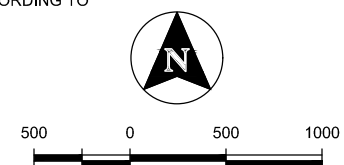


#### LEGEND

-  APPROXIMATE WEST PLAINS PDA BOUNDARY
-  APPROXIMATE WETLAND BOUNDARY

### WEST PLAINS PDA WETLAND INVENTORY EXHIBIT FIGURE B

NOTE: ONLY WETLANDS WITHIN WEST PLAINS PDA ARE SHOWN.  
WETLAND AREAS ARE DERIVED FROM THE NATIONAL WETLAND  
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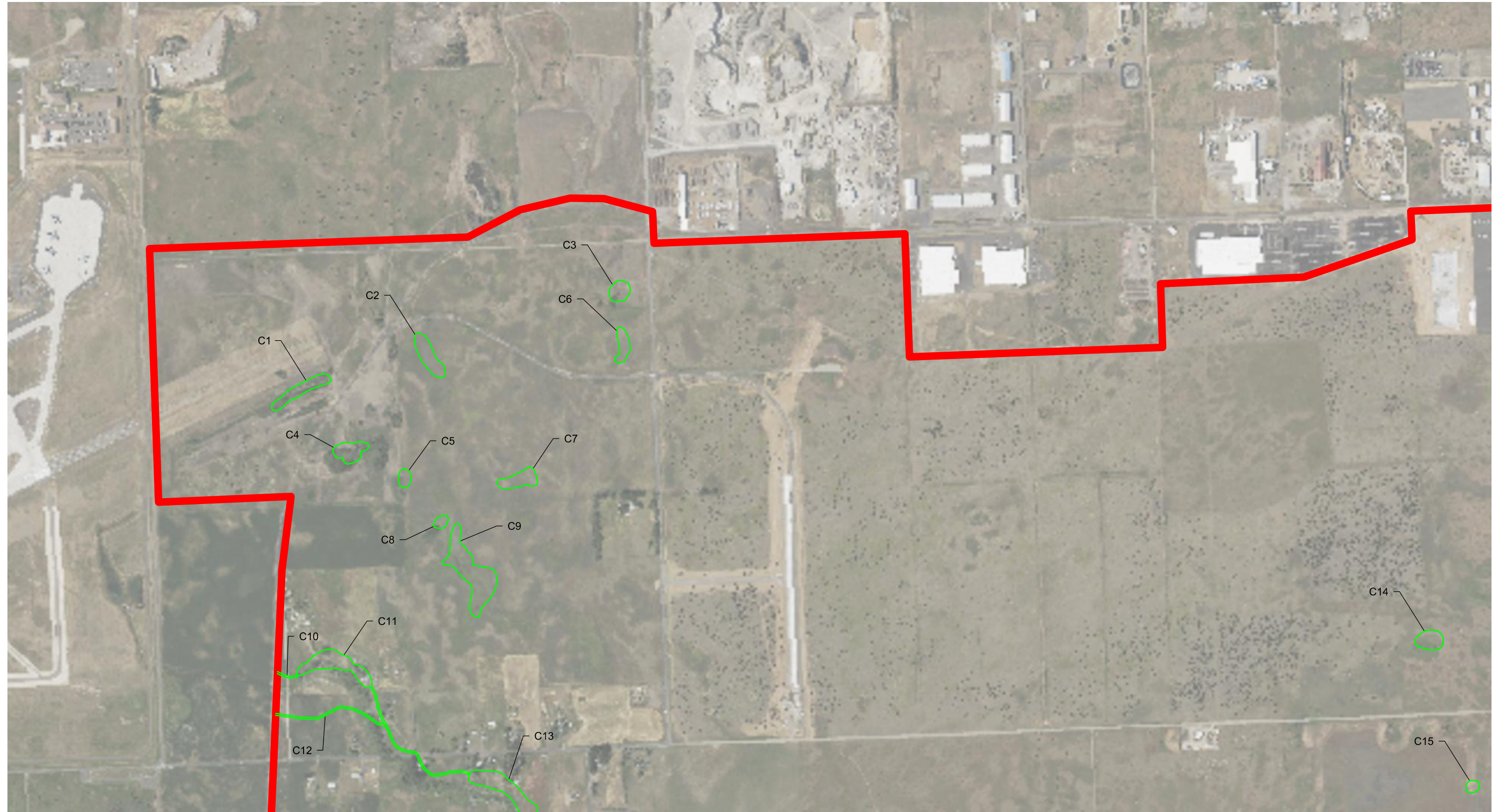
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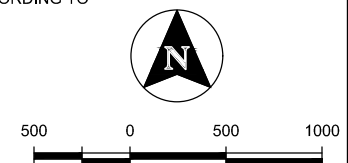


LEGEND

- APPROXIMATE WEST PLAINS PDA BOUNDARY
- APPROXIMATE WETLAND BOUNDARY

WEST PLAINS PDA  
WETLAND INVENTORY EXHIBIT  
FIGURE C

NOTE: ONLY WETLANDS WITHIN WEST PLAINS PDA ARE SHOWN.  
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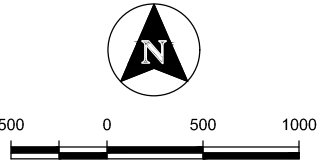


LEGEND

- APPROXIMATE WEST PLAINS PDA BOUNDARY
- APPROXIMATE WETLAND BOUNDARY

WEST PLAINS PDA  
WETLAND INVENTORY EXHIBIT  
FIGURE D

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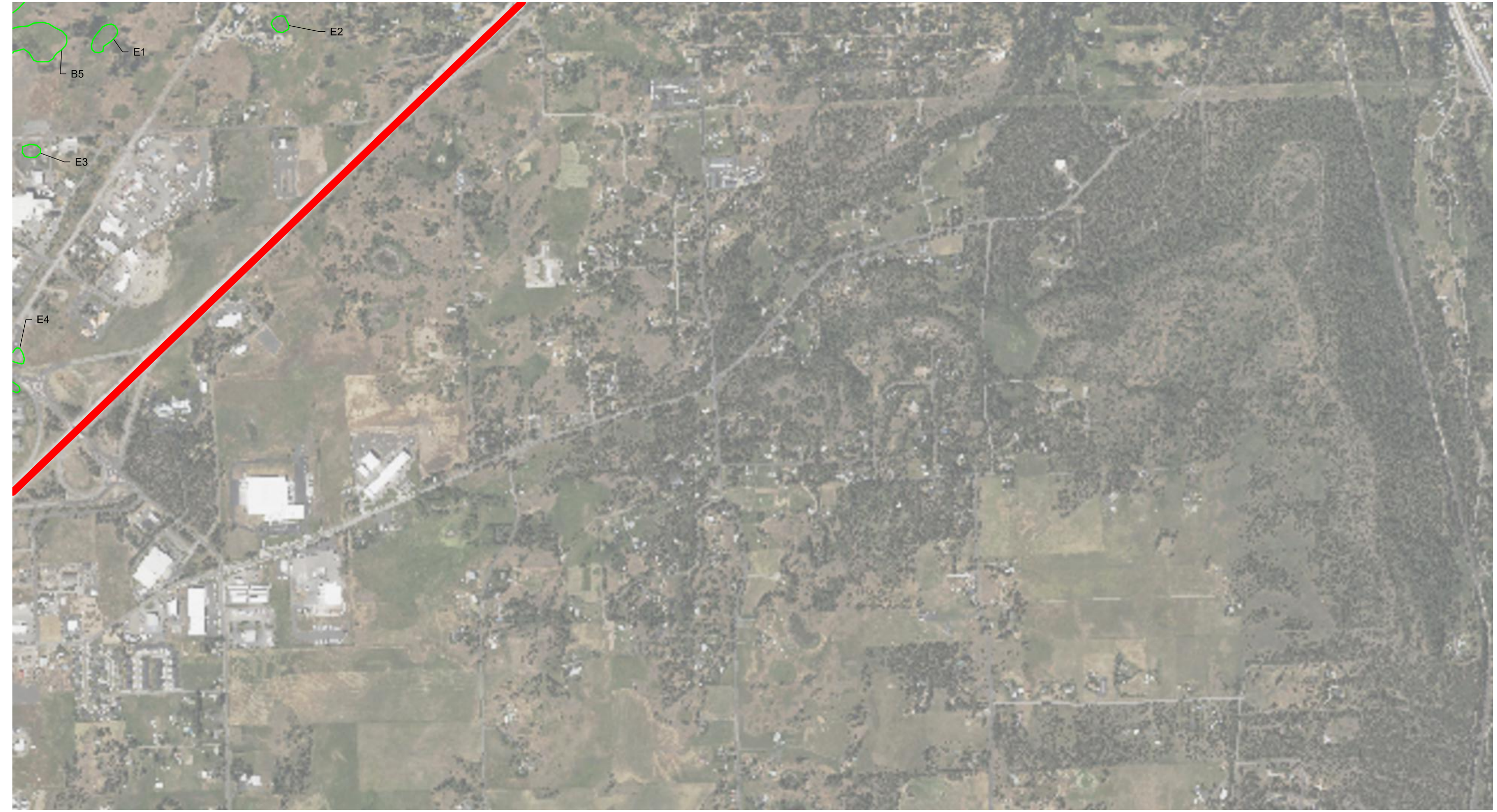




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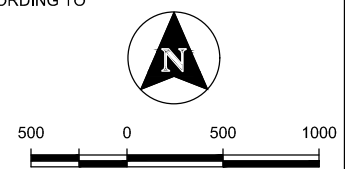


LEGEND

-  APPROXIMATE WEST PLAINS PDA BOUNDARY
-  APPROXIMATE WETLAND BOUNDARY

WEST PLAINS PDA  
WETLAND INVENTORY EXHIBIT  
FIGURE E

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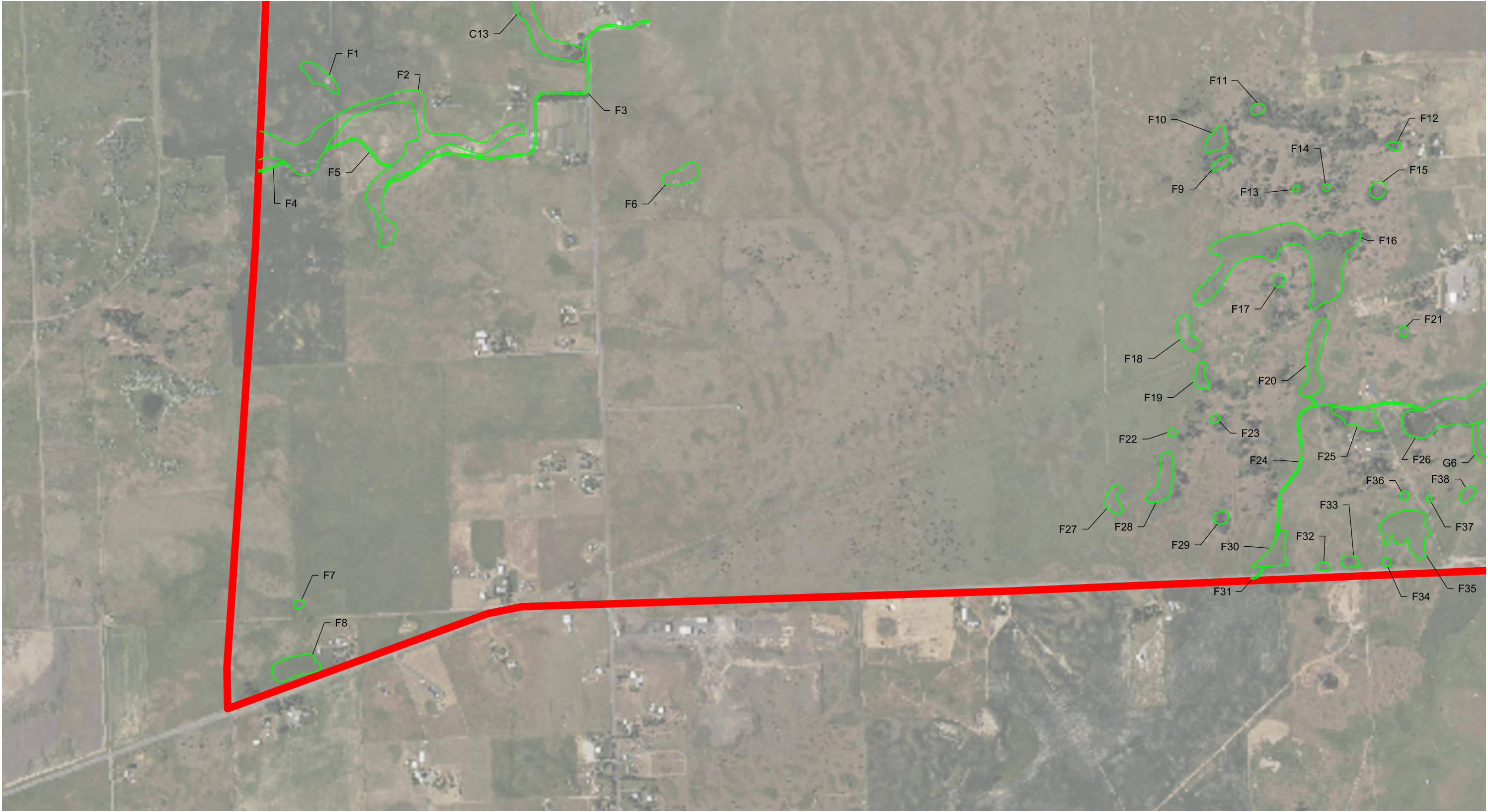
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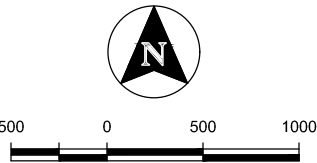


LEGEND

-  APPROXIMATE WEST PLAINS PDA BOUNDARY
-  APPROXIMATE WETLAND BOUNDARY

WEST PLAINS PDA  
WETLAND INVENTORY EXHIBIT  
FIGURE F

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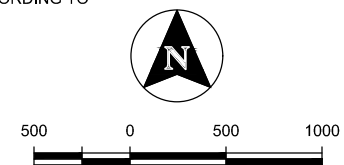


#### LEGEND

-  APPROXIMATE WEST PLAINS PDA BOUNDARY
-  APPROXIMATE WETLAND BOUNDARY

### WEST PLAINS PDA WETLAND INVENTORY EXHIBIT FIGURE G

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| WETLAND SUMMARY TABLE |                                      |                      |                   |                    |
|-----------------------|--------------------------------------|----------------------|-------------------|--------------------|
| WETLAND               | CLASS                                | CLASSIFICATION       | ESTIMATED ACREAGE | SUSPECTED CATEGORY |
| A1                    | RIVERINE                             | R5UBH                | 1.14              | 3                  |
| A2                    | FW EMERGENT WETLAND + POND           | PUBHx, PAB4Hx, PEM1C | 10.32             | 3                  |
| A3                    | RIVERINE                             | R5UBHx               | 7.63              | 3                  |
| A4                    | FW POND                              | PAB4Hx               | 0.35              | 3                  |
| A5                    | FW EMERGENT WETLAND                  | PEM1A                | 0.34              | 3                  |
| A6                    | FW EMERGENT WETLAND                  | PEM1F                | 1.13              | 3                  |
| A7                    | FW EMERGENT WETLAND                  | PEM1C                | 4.88              | 3                  |
| A8                    | FW EMERGENT WETLAND                  | PEM1A                | 3.55              | 3                  |
| A9                    | FW EMERGENT + FORESTED/SHRUB WETLAND | PEM1A, PSS1C         | 9.67              | 3                  |
| A10                   | FW EMERGENT WETLAND                  | PEM1A                | 0.82              | 3                  |
| A11                   | FW EMERGENT WETLAND                  | PEM1A                | 4.00              | 3                  |
| A12                   | FW EMERGENT WETLAND                  | PEM1A                | 2.14              | 3                  |
| A13                   | FW EMERGENT WETLAND                  | PEM1A                | 6.32              | 3                  |
| A14                   | FW EMERGENT + FORESTED/SHRUB WETLAND | PFO1A, PEM1A         | 3.03              | 3                  |
| A15                   | FW EMERGENT WETLAND                  | PEM1A                | 3.37              | 3                  |
| A16                   | RIVERINE                             | R5UBH                | 0.67              | 3                  |
| A17                   | FW FOREST/SHRUB WETLAND              | PSS1C                | 0.68              | 3                  |
| A18                   | FW EMERGENT WETLAND                  | PEM1A                | 2.67              | 3                  |
| A19                   | FW EMERGENT WETLAND + RIVERINE       | PEM1A, R5UBH         | 17.23             | 3                  |
| B1                    | FW EMERGENNT WETLAND                 | PEM1A                | 0.18              | 3                  |
| B2                    | FW FOREST/SHRUB WETLAND              | PSS1C                | 1.63              | 3                  |
| B3                    | FW EMERGENNT WETLAND                 | PEM1C                | 7.54              | 3                  |
| B4                    | FW EMERGENNT WETLAND                 | PEM1C                | 2.37              | 3                  |
| B5                    | FW EMERGENNT WETLAND                 | PEM1A, PSS1A         | 31.75             | 3                  |
| B6                    | FW EMERGENNT WETLAND                 | PEM1C                | 1.96              | 3                  |
| B7                    | FW FOREST/SHRUB WETLAND              | PSS1C                | 1.56              | 3                  |
| B8                    | FW EMERGENT WETLAND + RIVERINE       | PEM1C, R4SBC         | 1.69              | 3                  |
| B9                    | FW EMERGENT WETLAND                  | PEM1C                | 11.47             | 3                  |
| B10                   | FW FOREST/SHRUB WETLAND              | PSS1C                | 0.78              | 3                  |
| C1                    | FW POND                              | PUBHx                | 2.04              | 3                  |
| C2                    | FW EMERGENT WETLAND                  | PEM1A                | 2.12              | 3                  |
| C3                    | FW POND                              | PUBHx                | 1.14              | 3                  |
| C4                    | FW POND + FOREST/SHRUB WETLAND       | PSS1C, PAB3H         | 1.71              | 3                  |
| C5                    | FW FOREST/SHRUB WETLAND              | PSS1C                | 0.63              | 3                  |
| C6                    | FW EMERGENT WETLAND                  | PEM1A                | 1.14              | 3                  |
| C7                    | FW EMERGENT WETLAND                  | PEM1A                | 1.67              | 3                  |
| C8                    | FW FOREST/SHRUB WETLAND              | PSS1C                | 0.47              | 3                  |
| C9                    | FW EMERGENT WETLAND                  | PEM1A, PEM1F         | 5.91              | 3                  |

|     |                                                 |                      |       |   |
|-----|-------------------------------------------------|----------------------|-------|---|
| C10 | FW EMERGENT WETLAND                             | PEM1Cx               | 0.13  | 3 |
| C11 | FW EMERGENT + FORESTED/SHRUB WETLAND + RIVERINE | PEM1A, PFO1A, R4SBC  | 4.44  | 3 |
| C12 | RIVERINE                                        | R4SBC                | 0.72  | 3 |
| C13 | FW EMERGENT WETLAND + RIVERINE                  | PEM1Ad, R4SBC        | 7.90  | 3 |
| C14 | FW EMERGENT WETLAND                             | PEM1A                | 1.44  | 3 |
| C15 | FW EMERGENT WETLAND                             | PEM1A                | 0.44  | 3 |
| D1  | FW EMERGENT WETLAND                             | PEM1A                | 3.04  | 3 |
| D2  | RIVERINE                                        | R5UBFx, R4SBC, R5UBH | 5.24  | 3 |
| D3  | FW FOREST/SHRUB WETLAND                         | PSS1A                | 4.60  | 3 |
| D4  |                                                 |                      |       |   |
| D5  |                                                 |                      |       |   |
| D6  | FW EMERGENT WETLAND                             | PEM1C                | 0.63  | 3 |
| D7  | FW EMERGENT WETLAND                             | PEM1A                | 1.48  | 3 |
| D8  | FW EMERGENT + FOREST/SHRUB WETLAND              | PEM1F, PSS1C         | 1.19  | 3 |
| D9  | FW POND                                         | PUBHx                | 7.91  | 3 |
| E1  | FW EMERGENT WETLAND                             | PEM1A                | 1.42  | 3 |
| E2  | FW POND                                         | PAB4H                | 0.69  | 3 |
| E3  | FW POND                                         | PUBHx                | 0.63  | 3 |
| E4  | FW EMERGENT + FOREST/SHRUB WETLAND              | PEM1F, PSS1C         | 0.52  | 3 |
| F1  | FW EMERGENT WETLAND                             | PEM1C                | 1.70  | 3 |
| F2  | FW EMERGENT WETLAND                             | PEM1C, PEM1A         | 20.71 | 3 |
| F3  | RIVERINE                                        | R4SBC                | 2.58  | 3 |
| F4  | RIVERINE                                        | R4SBC                | 0.18  | 3 |
| F5  | RIVERINE                                        | R4SBC                | 0.47  | 3 |
| F6  | FW EMERGENT WETLAND                             | PEM1A                | 1.73  | 3 |
| F7  | FW EMERGENT WETLAND                             | PEM1C                | 0.24  | 3 |
| F8  | FW EMERGENT WETLAND                             | PEM1C                | 2.83  | 3 |
| F9  | FW EMERGENT WETLAND                             | PEM1C                | 0.52  | 3 |
| F10 | FW EMERGENT WETLAND                             | PEM1C                | 1.27  | 3 |
| F11 | FW EMERGENT WETLAND                             | PEM1C                | 0.41  | 3 |
| F12 | FW FOREST/SHRUB WETLAND                         | PSS1C                | 0.29  | 3 |
| F13 | FW EMERGENT WETLAND                             | PEM1C                | 0.12  | 3 |
| F14 | FW EMERGENT WETLAND                             | PEM1C                | 0.14  | 3 |
| F15 | FW EMERGENT WETLAND                             | PEM1C                | 0.70  | 3 |
| F16 | FW EMERGENT + FOREST/SHRUB WETLAND              | PEM1A, PSS1A         | 17.85 | 3 |
| F17 | FW EMERGENT WETLAND                             | PEM1C                | 0.41  | 3 |
| F18 | FW EMERGENT WETLAND                             | PEM1A                | 1.49  | 3 |
| F19 | FW EMERGENT WETLAND                             | PEM1A                | 0.90  | 3 |
| F20 | FW EMERGENT WETLAND                             | PEM1C                | 3.36  | 3 |
| F21 | FW EMERGENT WETLAND                             | PEM1C                | 0.23  | 3 |

|                                      |                            |                      |        |   |
|--------------------------------------|----------------------------|----------------------|--------|---|
| F22                                  | FW EMERGENT WETLAND        | PEM1A                | 0.18   | 3 |
| F23                                  | FW FOREST/SHRUB WETLAND    | PSS1A                | 0.22   | 3 |
| F24                                  | RIVERINE                   | R4SBC                | 1.61   | 3 |
| F25                                  | FW EMERGENT WETLAND + POND | PEM1C, PEM1Fx, PUBHx | 2.27   | 3 |
| F26                                  | FW EMERGENT WETLAND + POND | PEM1C, PEM1Fx, PUBHx | 20.29  | 3 |
| F27                                  | FW EMERGENT WETLAND        | PEM1A                | 1.08   | 3 |
| F28                                  | FW EMERGENT WETLAND        | PEM1A                | 2.33   | 3 |
| F29                                  | FW EMERGENT WETLAND        | PEM1C                | 0.51   | 3 |
| F30                                  | FW EMERGENT WETLAND        | PEM1C                | 1.99   | 3 |
| F31                                  | RIVERINE                   | R4SBC                | 0.11   | 3 |
| F32                                  | FW EMERGENT WETLAND        | PEM1C                | 0.31   | 3 |
| F33                                  | FW EMERGENT WETLAND        | PEM1C                | 0.56   | 3 |
| F34                                  | FW EMERGENT WETLAND        | PEM1C                | 0.21   | 3 |
| F35                                  | FW EMERGENT WETLAND        | PEM1C                | 4.95   | 3 |
| F36                                  | FW EMERGENT WETLAND        | PEM1C                | 0.19   | 3 |
| F37                                  | FW EMERGENT WETLAND        | PEM1C                | 0.10   | 3 |
| F38                                  | FW EMERGENT WETLAND        | PEM1C                | 0.57   | 3 |
| G1                                   | FW EMERGENT WETLAND        | PEM1A                | 0.23   | 3 |
| G2                                   | FW EMERGENT WETLAND        | PEM1A                | 0.59   | 3 |
| G3                                   | FW EMERGENT WETLAND        | PEM1F                | 0.34   | 3 |
| G4                                   | FW POND                    | PUBHx                | 0.16   | 3 |
| G5                                   | RIVERINE                   | R4SBC                | 0.65   | 3 |
| G6                                   | RIVERINE                   | R5UBHx               | 3.79   | 3 |
| G7                                   | FW POND                    | PUBHx                | 1.34   | 3 |
| G8                                   | FW EMERGENT WETLAND        | PEM1C                | 0.29   | 3 |
| G9                                   | FW POND                    | PUBHx                | 0.18   | 3 |
| G10                                  | FW POND                    | PUBHx                | 1.42   | 3 |
| G11                                  | FW EMERGENT WETLAND        | PEM1C                | 0.14   | 3 |
| G12                                  | FW EMERGENT WETLAND        | PEM1C                | 0.57   | 3 |
| G13                                  | DEPRESSIONAL WETLAND       | PFO1A                | 0.50   | 2 |
| G14                                  | DEPRESSIONAL WETLAND       | PEM1C                | 0.01   | 2 |
| G15                                  | DEPRESSIONAL WETLAND       | PFO1A                | 3.50   | 2 |
| TOTAL ESTIMATED WETLAND AREA (ACRES) |                            |                      | 309.44 |   |



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