



Response to Comments

Short-term Interim Action Work Plan for Spokane International Airport PFAS

Public comment period held May 1 – June 30, 2026

Facility Site ID: 6332493, Cleanup Site ID: 16774

Toxics Cleanup Program

Washington Department of Ecology
Spokane, Washington

July 2026

Document Information

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

Related Information

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

Contact Information

Toxics Cleanup Program²

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Language Access

The Department of Ecology offers free translation and interpretation services. If you need help in your preferred language, please call Erika Beresovoy at 509-385-2290 and request an interpreter, or email erika.beresovoy@ecy.wa.gov.

¹ <https://go.ecology.wa.gov/SIA-PFAS>

² <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 Toxics Cleanup Program works to remedy these situations through cleanup actions. 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](#)³ (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 May 1 through June 30, 2026, for the [Short-term Interim Action Work Plan](#)⁴ to provide safe water for the Spokane International Airport (SIA) PFAS cleanup site. Ecology is requiring SIA, the City of Spokane, and Spokane County (responsible parties) to provide safe water to private wells with PFAS (per- and polyfluoroalkyl substances) above drinking water standards in the interim action area (Figure 1). To provide water while wells are tested and wellhead treatment systems are designed, they are providing:

- One pitcher and one countertop filter certified to remove PFAS and replacement cartridges. Two 5-gallon, food-safe containers and access to the Garden Springs fill station, which can fill a range of container sizes. PFAS testing results are *not* required to receive these filters and containers, and you can pick them up at the following locations:
 - Waste to Energy Plant - Administration Building, 2900 S. Geiger Blvd., Spokane
 - Spokane City Hall, 808 W. Spokane Falls Boulevard



Figure 1. Emergency interim action area where safe water will be provided to residents and businesses with contaminated private wells.

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

⁴ <https://apps.ecology.wa.gov/cleanupsearch/document/169450>

- Replacement cartridges for under-sink filters the Washington Department of Health installed. Ongoing maintenance will be addressed in the Long-term Interim Action Work Plan.
- PFAS testing for all private wells in the interim action area. Testing is voluntary. We encourage you to respond when GSI Environmental contacts you to schedule well testing. To sign up for testing, visit [Drinking Water Access for the West Plains](#).⁵

The city and county joined us for an open house and public meeting June 16 ([download the slides](#)⁶) that was attended by about 50 people. We discussed the short-term plan, provided an update on the investigation, answered questions, listened to your concerns, and accepted written comments. Water filters and containers were available in the lobby for people with private wells in the interim action area. We appreciated the thoughtful questions and comments from attendees and were pleased to continue to see new faces. **Please join our [West Plains PFAS updates email list](#)⁷ to receive regular updates about this issue.**

Ecology appreciates the 15 comments we received. We address them in the Response to Comments section that begins on page 5. 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](#)⁸ 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](#)⁹ 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

⁵ <https://www.gegwater.com/>

⁶ <https://apps.ecology.wa.gov/cleanupsearch/document/172092>

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

⁸ <https://apps.ecology.wa.gov/cleanupsearch/document/145583>

⁹ <https://apps.ecology.wa.gov/cleanupsearch/document/149715>

SIA completed the [Initial PFAS Investigation Report](#)¹⁰ in March 2026. The report includes maps and preliminary analyses of soil and groundwater data. The results will be used to develop a remedial investigation work plan.

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](#)¹¹ in late 2025 and signed it in January 2026. 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.

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, Figure 1 on page 3). We provided the responsible parties a [scope of work and schedule](#)¹² 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)

This comment period was for the short-term interim action. The responsible parties began providing POU filters and planning to test private wells while it was ongoing. Testing began on June 29.

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 note under Table 1). All comments were received through our online comment form, except the two handwritten comments from attendees of the public meeting on June 16.

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.

¹⁰ <https://apps.ecology.wa.gov/cleanupsearch/document/169127>

¹¹ <https://apps.ecology.wa.gov/cleanupsearch/document/166446>

¹² <https://apps.ecology.wa.gov/cleanupsearch/document/167075>

Table 1. Index of comments received

Name	Organization	Date received	Page
Anonymous	None	June 4	6
Anonymous*	None	June 5	7
Anonymous*	None	June 8	8
Anonymous	None	June 16	12
Mary Benham	None	May 14	13
Good eg Furulie	None	June 7	13
Gerald Goertz*	DCRWA [Deep Creek Ranchettes Water Association]	May 22	8
John Hancock	None	May 26	14
John Hancock	West Plains Water Coalition President	June 29	15
Zan Johnston*	None	June 15	8
JE McHugh	None	June 16	16
JE McHugh	Palisades Neighborhood	June 18	17
Rick Perleberg*	None	June 5	9
Nick Scharff*	None	May 13	9
Tom on Assembly	None	June 16	19

* These comments share concerns about the short-term water options, so they have been grouped under the second anonymous comment (page 7) and provided one response.

Anonymous, received online June 4

So I got the SIA letter in the mail this week. Didn't we do this in 2024 with testing and Culligan delivery?

Reading the letter from the airport- we know you were required to use AFFF's. That is basically what you (the Airport) say in every response to this problem.

The PFAS in the water is one thing- and we have learned to filter it. The bigger problem is that you tested and knew about the PFAS levels in 2017 and did not tell the people who live around the airport and depend on that water. While you got clean city water piped into the airport, You didn't tell us about the PFAS you found that we continued drinking!

Someone had to public records search it. We could have bought some filters if we knew. You took away our ability to make decisions to care for ourselves and our children by keeping those test results secret. That is the problem that you are skirting every time you blame the FAA. Who was in on the decision to keep it secret? That's who I blame for the scale of this mess.

Your revisionist history is propaganda and it's about damn time you step up and provide some help to the people who depend on this water and who have PFAS chemicals built up in their systems.

If you'd told us in 2017 we would be so much further in along. What do I do about the PFAS in my blood now?

And yes PFAS are everywhere but these PFAS came from AFFF's used on the west plains at the airport and Fairchild.

Ecology's response

Thank you for sharing your concerns. We are requiring the responsible parties to test all private wells within the interim action area (Figure 1, page 3) as part of the emergency interim actions. Wells with no PFAS will be tested every two years, and wells with PFAS will be tested every year. Although we haven't seen big changes in any wells that have been tested multiple times, a sampling event is a snapshot in time. Because contamination and groundwater are constantly moving, we cannot know future levels at any location based on one sample.

EPA and Ecology completed the testing in 2024 because we hadn't confirmed the source yet. Those results were part of the information we used to determine the area affected by the airport.

We will share this response to comments document with the responsible parties, so they may consider your comments as well. We have no knowledge of, and cannot speak to, the responsible parties' past decisions about disclosure or non-disclosure of contamination and who knew what and when.

Concerns about short-term water options

Anonymous, received online June 5

I have used the garden springs fill site to fill camping jugs provided by Spokane.

I cannot grasp how this can be considered a safe, clean fill site. The hose appears to be just garden hose grade hanging from a water spigot on side of the building. The hose is not long enough to fill my jugs in my vehicle so I have to set them on ground which is covered with dirt, gravel, leaves, cut grass much less the wildlife that likely drink and migrate to the puddle of water from spills.

Spills are not just from jug filling, but from large water construction tankers as they get full and splash on concrete pad lying right next to small fill hose. The hose must be wiped down with antibacterial cleaning on exterior as how is a person to trust when that construction truck has been and what splashed off. What about the interior?

I do not consider this a clean environment, to fill from and unsafe with large trucks filling less than 4' away and is unsafe for many other reasons much less freezing ice conditions when cold temps occur.

I would compare this fill setup to camping at the lake, not something for daily drinking water use.

....

Drinking Water delivered to affected residents is a much safer environment and jugs are sealed and sanitized each time.

Anonymous, received online June 8

The Short-term Action plan is insufficient to meet the needs of all community members equitably. Many of the affected community members are retirees unable to lift and carry 40 pounds of water (x2), and many may not drive or have access to transportation to obtain filtration supplies. Furthermore, what of the families whose members work during the times the Administration Office of Waste to Energy and City Hall is open? Do we expect them to suffer yet another loss (this time of income) in order to access water that won't poison them? While the vast majority of affected humans are homeowners, this by no means implies that they are wealthy or even well-off. Many have lost large chunks of their livelihood due to this contamination impacting their ability to grow, eat and sell home-raised food such as meat, eggs, milk or vegetables. Asking them to incur yet another cost to fetch water is the epitome of short-sightedness and inequitable government "assistance".

We can only hope that the Long-Term plan does more to serve the actual needs of our neighbors, in real time terms, and in a way that equitably meets the needs of all affected.

Gerald Goertz, DCRWA, received online March 9

I would like to comment about the lack of concern or information from SIA or the City of Spokane. Unlike what FAFB and WA Dept. Of Ecology did by delivering bottled water to homeowners, SIA took the cheapest way out to meet bare minimum requirements. By making homeowners pickup 2 water jugs, a counter filter and having to haul their own water from a fill station is totally wrong. Then to top it off they are charging for the water. The homeowners did not create this mess and SIA attitude towards us and taking care of the mess they created is unacceptable. All the while SIA is a \$Billion + Agency dragging their feet and pointing fingers at everybody else "not our problem" It's time SIA does the thing to take care of the citizens of the West Plains.

Zan Johnston, received online June 15

The interim solution to obtain water from the Garden Springs filling station is not realistic to satisfy our family's needs while we await the installation of our home filtration systems at some unknown point down the road.

My husband and I are senior citizens so we do have issues with the PFAS problem in general and specifically with this interim water solution. Suffice to say our first experience at the filling station was not very pleasant. It's not likely we'll use that facility to get water for our home use in the future. As was mentioned by one commentator we wouldn't drink the water that came out of the hose either. It doesn't look like a very sanitary mechanism. It appears water would freeze up in the hose in the winter so it isn't clear how you would be able to use the facility during that time period. Looks like you would have to disinfect the containers you use too.

We would prefer to have the filter systems put in now but if that isn't possible why can't the people who didn't get at least one under the sink filter have one installed free in addition to

using this water station for those who want to use it. The Fogle plumbing people did a nice job of putting our filter in for us. It has helped. Similar to another commentator the entities involved in this should be able to afford to pay for at least put in one under the sink filter for each family. Although we appreciate having the one under the sink filter, it is not sufficient. We have multiple structures on our property that had water available that we and our animals were able to use before we were notified about the PFAS problem. We would like to have an under the sink filter for all our sinks in all of the structures that had drinkable water before the poisoning and free filters provided on-going.

We currently pay for Culligan water in addition to using the under-sink filter we were provided. We will likely keep that contract going as trying to use this water station is just not practical for us. Installing replacement filters has its own challenges. There's a cost to this Culligan water we have to pay but at least we have water delivered to us. The driver usually brings the water up to the house so we only have to haul it inside and deliver it to the other structures on the property.

One thing that would mitigate some of this would be to lower our property taxes as a result of this PFAS damage. Additionally, maybe the zoning could be changed so we could do what we want with our property. Perhaps we could build some ADUs or tiny homes to rent out to help pay expenses including the interim water. It would also cut down on the amount of grass that's so concerning to the fire insurance companies since we can't really support having the animals we need to eat the grass due to the water problem.

On a positive note, we appreciated the event where we got the jugs and the counter filter. The people were very nice and genuinely reflected a true caring for our situation.

Rick Perleberg, received online June 5

Providing residents in the contaminated area with a filter pitcher is NOT providing safe drinking water. That is a slap in the face to community members who are living with contaminated wells. City, county and airport leadership should be ashamed of themselves! What a cop out! Do what is right and invest in a community future that include a point of entry filtration system AND continued service of those POET systems. You can afford it! Do the right thing.

Nick Scharff, received online May 13

I want to take a minute to share my thoughts about the recent PFAS filter and water jug handout OPEN House held May 9th at WTE Plant parking lot 10-2pm.

I want to Thank Wa DOE for opportunity to comment

- The First notice I received any notice about the Open House event was May 5th about 6pm by email from a neighbor, Normally I receive this kind of information via email directly from DOE,SRHD, WPWC and others as sending parties . The following day May 6 was a little media splash on tv, this provided at best a 4day notice of the event, to be held on a weekend filled with regional college graduations and other pre committed events for many family's where calendars fill up weeks in advance. There should be at minimum a two week advance notice delivered to affected parties so planning can occur

on our ends too. Also, a standard method we can expect communication as affected citizens needs to be established and adhered to as well. The above demonstrated this was a last minute planned event which should not be the case with proper planning.

- Listed as OPEN House, I was hopeful that some elected Spokane County and City Officials and Airport Officials would be in attendance to show this is an important matter they are taking seriously and could answer public's questions or simply discuss the contamination matter, Not surprising but very disappointing not a single one was in attendance at the time I witnessed.
- In line at the city tent I found my family was eligible for a Water filter pitcher and 2 blue 5 gallon camping water jugs with spouts. Also information about how I could sign up to get a water account setup so City can bill me for water should I choose to fill my jug at the Garden springs fill station. Wow how is it I get my water contaminated by Government parties, but if I choose to get clean drinking water from them, I will get billed too. This was very disturbing of how this is handled.

Even more disturbing as I witnessed the elderly couple in line behind me in a wheel chair and both in their 80s. How is it expected of them and many others to lug around a 5gallon camping jug, filling, loading, unloading, carrying in house, putting water spigot tube on jug just to fill a glass of water to drink from? This is something you do when camping not daily routine.

Aside from the filling and load/unload, carrying, just the fact of pouring from the jug alone is too burdensome and dangerous for someone of their age and ability's.

Likely many parties already have (Culligan or similar) 5 gallon dispensers and for some elderly maybe they down sized to a 2 ½ gallon version which makes more tolerable for weight restricted folks or maybe a family member can help setup the jug that will last a few days before changeout is needed. In either case fairly EASY and SAFE dispensing method for all. This needs addressing!

For those that need clean drinking water it needs to be delivered regularly to them as was before. Costs of delivered water will be minuscule in the grand scheme of remediation/cleanup costs

- Lastly this event checked a "required box" of STIAP for PLPS as a "Open House" by the label, but in my opinion certainly not by information /items distributed /shared /discussed and with whom. Infact very disappointing that a first ever event of its nature from PLPs communicating with affected parties did not demonstrate trust building environment, simply here is a bone!

Thank you Ecology for considering my point of view and addressing as we all attempt forward motion.

Ecology's response

Thank you, everyone, for sharing your concerns and appreciation for the progress that has been made. We will share this response to comments document with the responsible parties, so they may consider your comments as well.

Point-of-use (POU) filters

Our scope of work for the short-term interim action requires the responsible parties to provide bottled drinking water or install and maintain POU systems for residents and businesses in the interim action area who have PFAS in their private wells above drinking water standards. While we shared our preference for delivering bottled water, the responsible parties' choice to provide pitcher and countertop filters technically met the requirements. The Washington Department of Health installed 177 under-sink filters in the interim action area, and the responsible parties will provide replacement cartridges for these units.

People who can't pick up filters and containers can contact the county's community navigators for assistance at PFASCommunityNavigator@SRHD.org or 509-499-0309 or 509-263-2005.

Garden Springs fill station

Because we didn't require a large-volume water source, such as the Garden Springs fill station, that is an additional option for those who are able to use it. We will discuss your concerns about sanitation and use during winter with the responsible parties. We will consider your comments on equity while reviewing the draft long-term plan.

Point-of-entry treatment (POET) systems or connection to city water (long-term plan)

The resources available through the short-term plan are intended to bridge the gap until long-term solutions are implemented. We are requiring the responsible parties to move as quickly as possible on planning and constructing those long-term solutions.

The responsible parties must provide a POET system or connection to city water to residents and businesses with private wells above safe drinking water standards. Contracts are in place with two vendors for POET design and installation, and installations are expected to begin in July using the \$7.5 million managed by the Spokane County West Plains PFAS Task Force. Design work for the first City of Spokane water expansion is also underway. The responsible parties are developing the Long-term Interim Action Work Plan describing how they will complete this required work. The plan will be available for public comment later this year.

Public notice and responsible parties' participation in meetings

We will share your concerns about how the responsible parties communicate with the community, and your desire for elected officials and airport representatives to participate in public forums. We will work with the responsible parties to help improve their notification practices, continue to request their participation in public meetings, and share information via our West Plains PFAS updates email list.

Property taxes and value

If you have questions about your assessed property value, please contact the Spokane County appraiser listed on your annual notice.

Anonymous, received at the public meeting June 16

PUBLIC COMMENT FORM

Please write your name and contact information (mailing address and/or email address) below.

We will respond to your comments after the public comment period closes. Our responses are published online, and we will also send them to you using the contact information you provide.

Name:

Anon.

Mailing address:

Email:

COMMENTS:

I saw the city joined a PFAS lawsuit in 2024, S.C. against AFFF Manufacturers.

Do you know if/how much of these funds will go to resident aid?

Also, if they knew enough in 2024 to advocate for themselves by joining a lawsuit, How come they did not notify residents who were still drinking contaminated water?

Is there a legal (ethical obviously) imperative to communicate such risks to affected residents?

Especially for elected leaders who know about a contamination (this one, since 2017) and did not notify their constituents, is there an imperative to represent the citizens over the interests of say the airport or S3R3?

Ecology's response

Ecology is legally required to notify people living near a contaminated site, and we have done that consistently since designating SIA as one in 2023. We use mailed notices to announce public comment periods, our SIA PFAS and [PFAS in West Plains private wells¹³](#) webpages, West Plains PFAS updates email list, and public events to share information with the community. We also respond to many email and phone inquiries.

We will share this response to comments document with the responsible parties, so they may consider your comments as well. We have no knowledge of, and cannot speak to, the responsible parties' past decisions about disclosure or non-disclosure of contamination and who knew what and when. While the responsible parties must complete the work we are requiring, we don't know whether or how much funding the city may use from manufacturer-related lawsuits to comply with the orders.

Mary Benham, received online March 8

On 5/11 we got a 12-cup Culligan counter top pitcher at City Hall; however, it's been two years since our well was tested. Fortunately, the test showed only one PFAS chemical. Until we have a second well test (which was promised), we don't know if the pitcher is the best device to protect us from PFAS contamination because we know the contamination is flowing NE toward our property.

Thank you, Ecology, for all you have done for the West Plains Community!

Ecology's response

Thank you for sharing your appreciation and concerns. We are requiring the responsible parties to test all private wells within the interim action area (Figure 1, page 3). You can sign up for a well test at gegwater.com. Wells with no PFAS will be tested every two years, and wells with PFAS will be tested every year. Although we haven't seen big changes in any wells that have been tested multiple times, a sampling event is a snapshot in time. Because contamination and groundwater are constantly moving, we cannot know future levels at any location based on one sample.

The pitcher and countertop filters the responsible parties are providing are certified by a third-party to remove PFAS at higher levels than what's been found in the West Plains.

Good eg Furulie, received online June 7

Why hasn't the department of ecology required the people responsible for the contamination of our well water to pay for whole house filtration systems like home owners around Fairchild AFB?

¹³ <https://ecology.wa.gov/west-plains>

Ecology's response

On Feb. 10, we notified the responsible parties they are required to provide whole-house filtration systems or connections to city water where possible (long-term interim action) to people with contaminated private wells in the interim action area. They are tentatively planning to start installing them in July using the \$7.5 million managed by the Spokane County West Plains PFAS Task Force. Design work for the first City of Spokane water expansion is also underway.

John Hancock, received online May 26

City and County have been drawn into Airport's bunker of secrecy, into the same questionable legal crouch, hoping to avoid citizen scrutiny. Airport delayed and hid. City and County must not. Ambiguity and obfuscation is cowardly, and it makes me angry. The City and County's elected leaders asked us voters for their jobs. I insist that they bravely step up and out now, unlike the Airport's leaders.

City's new program of 1-cent water to go is an insult to common sense. The trouble is in the homes of the 900 families. That's where clean water must be delivered, with reasonable convenience for regular people, and extra help for people with strength limitations. We insist on clean water from faucets in our homes, not from portable plastic 48-pound jugs we drive to fill and load. We're not camping. Fairchild has delivered bottled water to many homes, for a long time, with generally OK reviews.

Communications with 900 families is poor so far, because it's hard:

- City and County water departments are starting from scratch in this new neighborhood.
- Matching the aquifer residents at the Courthouse could have occurred long ago.
- Many people don't yet understand what's happening.
- No government services map shows the boundary of the PFAS trouble. Any straight-line boundary is a guess and an excuse, for example, when the parties point fingers and argue about the source.
- Facebook reaches just some. County tax bills reach us in the mailbox just fine. There's no uncertainty there.
- Media releases are cheap and simple, not thorough.

This mess requires public meeting discussion by the parties, to which we're invited as listeners. That's "the consent of the governed". Without that, distrust is infectious. I ask for a very public listening session hosted by County and City, to Ecology specifications, with a certified mail invitation to all 900 families, providing a factual summary of the contamination situation at hand. I want coordination at the highest levels of government services, not just because Ecology says so. The Airport exempted itself from Public Health duty, since 2017. County and City must create a different strategy.

Ecology's response

Our scope of work for the short-term interim action requires the responsible parties to provide bottled drinking water or install and maintain POU systems for residents and businesses in the interim action area who have PFAS in their private wells above drinking water standards. While we shared our preference for delivering bottled water, the responsible parties' choice to provide pitcher and countertop filters technically met the requirements. The Washington Department of Health installed 177 under-sink filters in the interim action area, and the responsible parties will provide replacement cartridges for these units.

People who can't pick up filters and containers can contact the county's community navigators for assistance at PFASCommunityNavigator@SRHD.org or 509-499-0309 or 509-263-2005.

Ecology and the responsible parties continue to try to reach all residents and property owners within the interim action area (Figure 1, page 3). Ecology's mailing lists are based on the assessor's records — the same information used to mail property tax information. The short-term interim action requires the responsible parties to contact all property owners in the interim action area, and if no response is received from mailers, by phone, or by email, the responsible parties must attempt to make contact in person by going door-to-door.

We will share this response to comments document with the responsible parties, so they may consider your comments and request for a city/county-hosted listening session.

John Hancock, West Plains Water Coalition President, received online June 29

The City's website gegwater.org is a fine start towards clean water services for families in the plume. It's clearly designed to be helpful and trust-building, by skilled staffers now authorized to get serious about helping.

But the leaders and spokespeople of the responsible parties are not doing their duty to explore or explain the competing difficulties of protecting both public health and Airport survival. The Coalition challenges the leaders of the responsibility parties to step up into public-forum accountability. Explain what you know and what we may not, name the cost and technical obstacles, and defend or give up your gripes about Ecology. Cost allocation among the 3 parties must not be a block to aquifer cleanup and safe drinking water. Give up Airport's legal excuses to block Air Force testing in its own plume. Clean it up now, and litigate later.

We understand "joint and several liability" to mean that Airport's grudge against the National Guard's PFAS is Airport's private concern, not a block to the authority of Ecology. And absent a new letter from FAA, Airport can't excuse itself from MTCA. I'd like to hear the details from the electeds, not their attorneys. Give us your views, please, as our public safety representatives, and stand at the microphone for questions.

We all know that the twin plumes of Fairchild and Airport blend together, because Hayford Rd is no water boundary. That's a topic for the eventual allocation of cost—it must not be used to delay progress towards cleanup. The City of Tucson, for instance, also with adjacent airport/AF base, admitted its drinking PFAS trouble immediately, more than 20 years ago. It didn't wait to

assign blame for contamination of City sources. They cleaned it first, building the professionalism and public support required to allocate responsibility and experiment with new technology.

Ecology, please find a way to pry loose the residential well test locations from Fairchild/EPA. Surely the professional engineers in both camps are producing objective underground chemical information, towards unified fate and transport mapmaking (to supplement Dr. Pritchard's). Without that data, there can be no comprehensive aquifer-wide factfinding.

Ecology's response

Thank you for your comments. As most of your comments are about the responsible parties' actions, we will share this response to comments document with them, so they may consider your comments as well.

While Ecology does not have individual private well test results from Fairchild's work, existing reports in the administrative record provide data at off-base monitoring wells. In addition, as Fairchild expands their investigation, more off-base monitoring wells will be installed, and data from new and existing monitoring wells will be available to us and the public.

JE McHugh, received online June 16

Before completing the requested GSI well survey, what does GSI do with our data once transferred to Ecology?

A written statement to well owners, assuring GSI will not use or reuse or share or sell our data for any other purpose, would be appreciated.

SIA Long-Term Action Plan - due May 11, 2026 -

Is there any part of this plan available for review by the public?

What provisions are made for vacant property, or vacant property for sale? Will the SIA be held responsible for testing of any / all new domestic wells permitted & drilled in the future?

If PFAS is detected in a new sole source well in this designated interim action area, will SIA be responsible for providing POET filtration systems for any new home built now, and in to the future?

Residents watch with concern as FAFB increased their study area north to the Spokane River – if the SIA PFAS plume is found beyond the current 'action area' boundary, in any direction, will this boundary be extended, if warranted?

Ecology's response

Thank you for your comments and questions. We consulted the responsible parties and received the following commitment regarding data use:

Information collected through the Water Well Survey and analytical results will be used to inform work being done for the Spokane International Airport PFAS Site as required under the Orders overseen by the Department of Ecology. Spokane International Airport,

Spokane County, City of Spokane, and consultants will use this information for purposes associated with the PFAS investigation efforts. Notwithstanding the above, any information or results may become a public record pursuant to Chapter 42.56 Revised Code of Washington.

The responsible parties submitted the draft Long-term Interim Action Work Plan on May 11. We reviewed it and provided comments June 2, which included requiring a more specific schedule to complete the work. The responsible parties [requested a 46-day deadline extension](#)¹⁴ on June 23. Due to the time needed to schedule meetings with local governments to approve funding for the long-term work, we [approved the extension](#).¹⁵ We expect the work to begin later this year. We will hold a 60-day public comment period and public meeting for the long-term plan after the responsible parties fully address our comments.

There is a [well drilling advisory](#)¹⁶ for the area of known and suspected PFAS contamination in the West Plains. Ecology and Spokane Regional Health District use it to notify drillers of the potential for PFAS contamination in groundwater and Washington's requirements for preserving natural barriers to groundwater movement between aquifers. The advisory doesn't prohibit drilling new wells. If a new well is drilled in the interim action area (Figure 1, page 3) and contaminated with PFAS above drinking water standards, the responsible parties are required to provide safe water to the property with the new well.

For now, the work will be limited to the interim action area, excluding homes already connected to city water. However, Washington's cleanup law requires responsible parties to find the full extent of contamination. As the investigation continues, the area may expand based on groundwater sampling results.

JE McHugh, Palisades Neighborhood, received online June 18

Time to address a West Plains elephant: S3R3 Solutions - a Public Development Authority

<https://www.s3r3solutions.com/>

(S3 = Spokane City, Spokane County, Spokane Int'l Airport; R3 = Roads, Rails, Runways)

The Spokane International Airport (SIA), as a member of S3R3 Solutions PDA, owns +/- 9,000 acres of land surrounding its facility. Within the 9,000 acres are 300+ acres of wetlands. Development of this large tract of land over time will potentially disrupt crucial wetland functions including stormwater infiltration, recharge of existing wells, and biologic diversity; PFAS contaminant transport and overall groundwater behavior will also be impacted across the West Plains.

Currently there's no targeted requirement for proposed development to effectively address surface/subsurface disturbance and overall landscape hardening (building footprint, roof

¹⁴ <https://apps.ecology.wa.gov/cleanupsearch/document/172652>

¹⁵ <https://apps.ecology.wa.gov/cleanupsearch/document/172653>

¹⁶ <https://ecology.wa.gov/west-plains-pfas-well-drilling-advisory>

runoff, impervious pavement). Subsurface disruption can also lead to water scarcity, a current problem on the West Plains.

The potential to increase the quantity and velocity of stormwater runoff and seasonal flooding that impacts basements, crawl spaces and roadways, are avoidable costs levied on homeowners and taxpayers. Over time, wetland disruption can also lead to concentration of contaminants in wells and in surface water reaching the Spokane River.

S3R3 Solutions marketing materials do not mention PFAS or wells. Solutions to future development impacts across the West Plains are not discussed in publications by Ecology or FAFB, or within the 20-year County comprehensive plan update currently underway. The Airport has not been heard from on this issue either, no surprise.

The S3R3 Solutions 'mitigation' approach to wetland disruption is proposed establishment of an off-site 'Harris Wetland Mitigation Bank', a collection of parcels equal to ~400 acres of "replacement" wetlands to be developed 24 miles south of Spokane - through the purchase of WMB 'credits' by developers within the PDA area. There is no predicting biologic function or financial success of this WMB.

In order to protect the hundreds of existing West Plains wells, 'foreseeable impacts' should be addressed up front through analysis of current data on PFAS levels across the SIA-FAFB impact areas. Suggested - a mechanism requiring a hydrogeological assessment within Ecology's Interim Action Plan and the final version of the SIA Enforcement Order.

When disrupted or eliminated, biologic diversity is curtailed, and wetlands no longer serve as wildfire reduction. Shouldn't DNR & WDFW weigh in on this, in detail?

If development aspirations are successful, will the Airport and the City-County co-owners be held responsible for future impacts to wells, if detected? As an agent of West Plains development, is S3R3 Solutions a responsible party if further contamination or water scarcity is introduced into our domestic wells as a result of development within the 9,000 acres?

How will private well safety and protection be ensured into the future? The county's August 2026 West Plains Aquifer Protection Area vote cannot be counted on for this.

The S3R3 Solutions 'Wetland Inventory' .pdf is attached [see Appendix].

Ecology's response

Thank you for your comments. They are outside the scope of this public comment period about the short-term plan to provide safe water to private wells affected by the Spokane International Airport PFAS site. When development is proposed, we encourage you to participate in the [State Environmental Policy Act](#)¹⁷ (SEPA) process, which identifies and analyzes environmental impacts associated with governmental decisions. You can search the [SEPA Register](#)¹⁸ for all proposed projects in Washington.

¹⁷ <https://ecology.wa.gov/SEPA>

¹⁸ <https://apps.ecology.wa.gov/separ/Main/SEPA/Search.aspx>

Tom on Assembly, received at the public meeting June 16

Name:	
Mailing address:	Tom on Assembly
Email:	

COMMENTS:

I am 5 houses outside the SIA boundary.

I am concerned.

Can I get assistance for testing?

Cost of the certified test is prohibitive.

P.S. I am here because of the Ecology flyer at my home address

Ecology's response

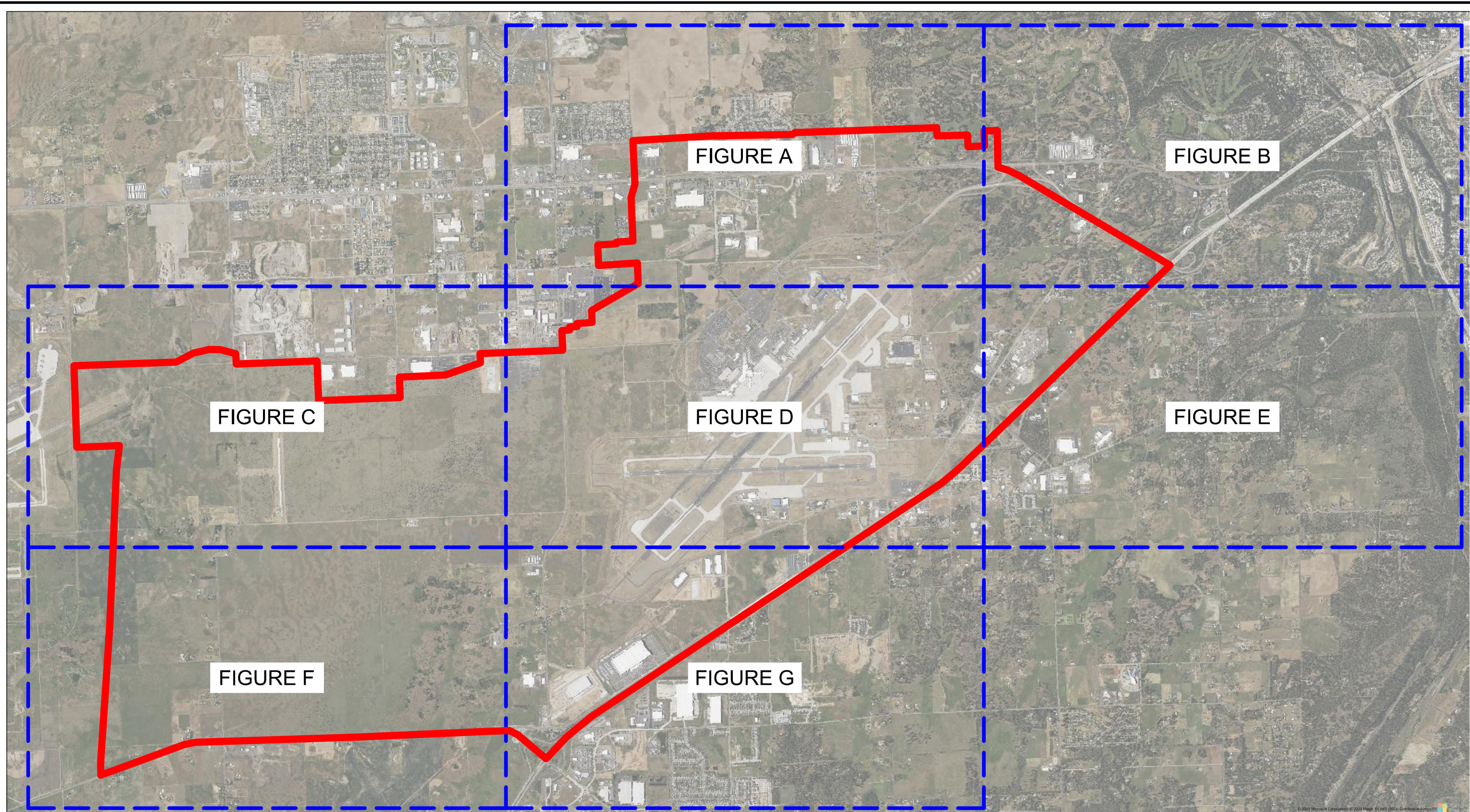
Thank you for your question. For now, the work will be limited to the interim action area (Figure 1, page 3), excluding homes already connected to city water. However, Washington's cleanup law requires responsible parties to find the full extent of contamination. As the investigation continues, the area may expand based on groundwater sampling results.

We understand you are on the mailing list for public outreach regarding this cleanup site but outside the interim action area. We are legally required to mail notices to people living near a contaminated site, and we have done that for every public comment period since designating SIA as one in 2023. At that time, we hadn't defined the area affected by the airport yet, but because it is a high-profile site, we mailed notices to a broad area. We are continuing to include everyone who originally received notices, regardless of whether they are in the currently defined affected area.

Appendix

Attachments to JE McHugh's comments

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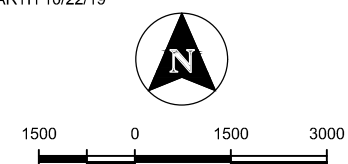


LEGEND

-  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

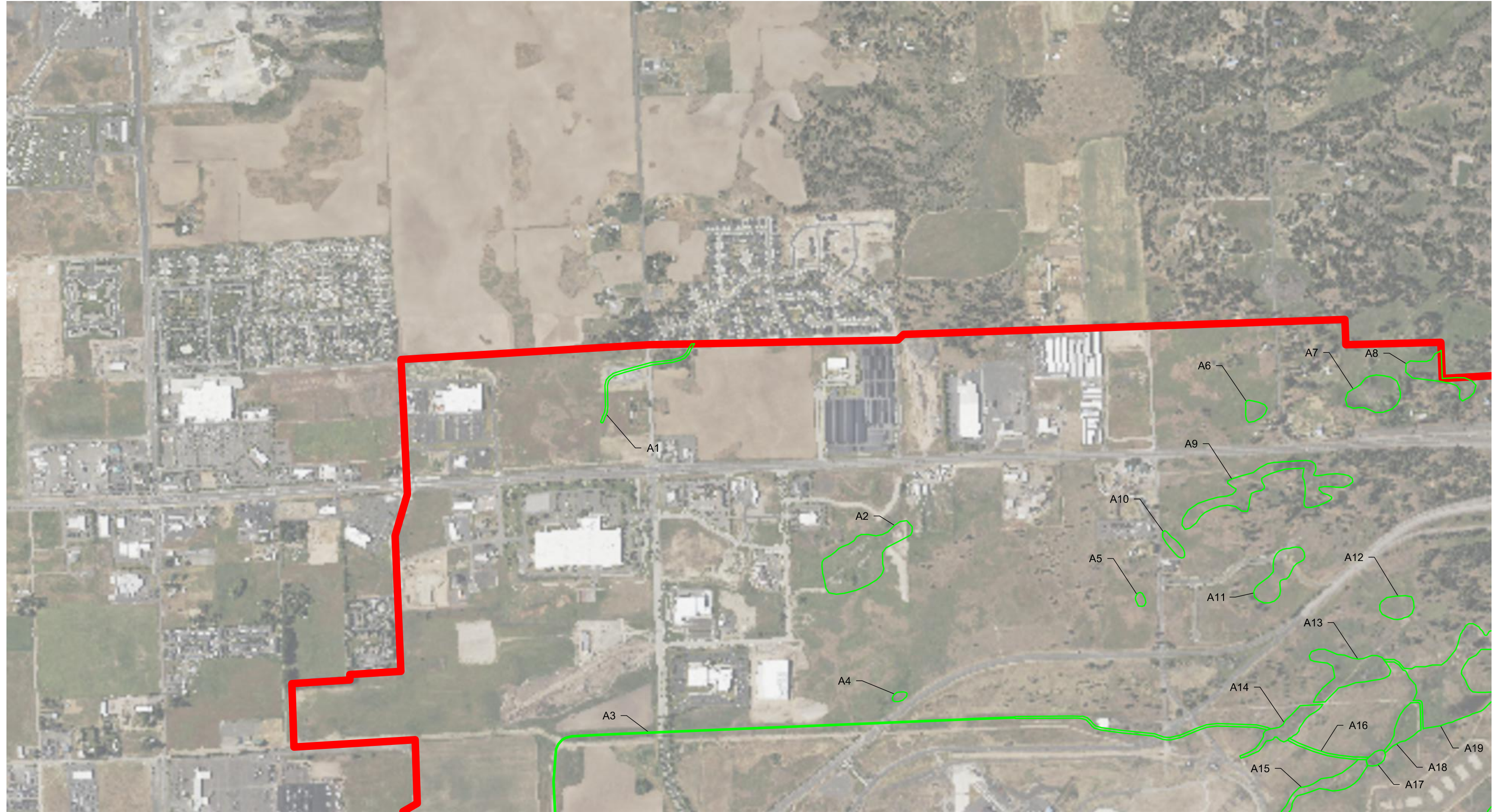


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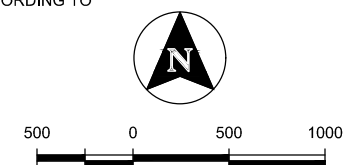


LEGEND

-  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.



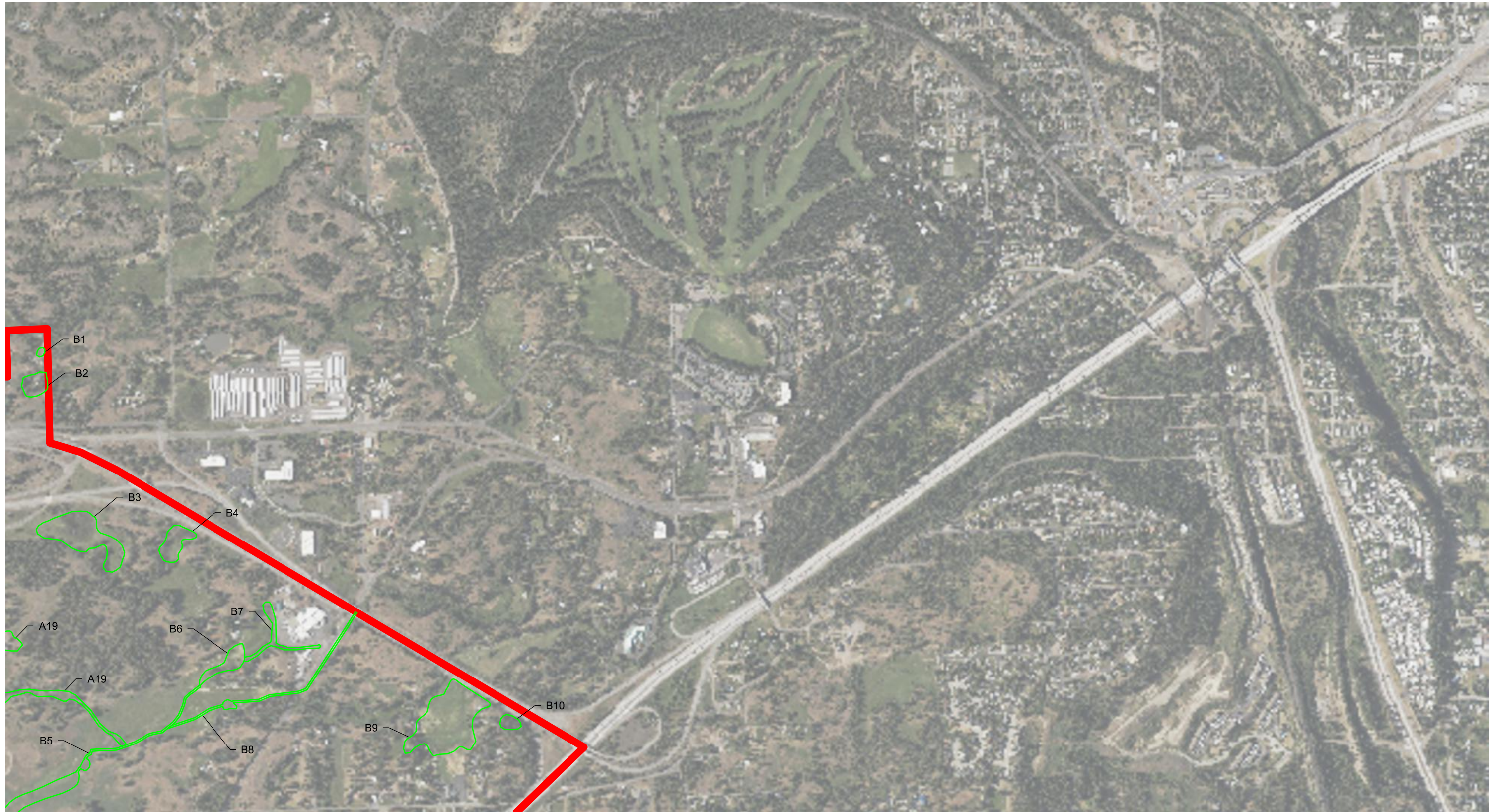
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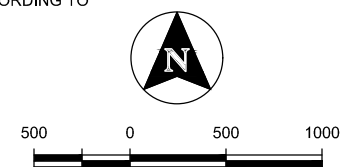


LEGEND

-  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.
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INVENTORY (NWI) REFERENCE MAPS AND ADJUSTED ACCORDING TO
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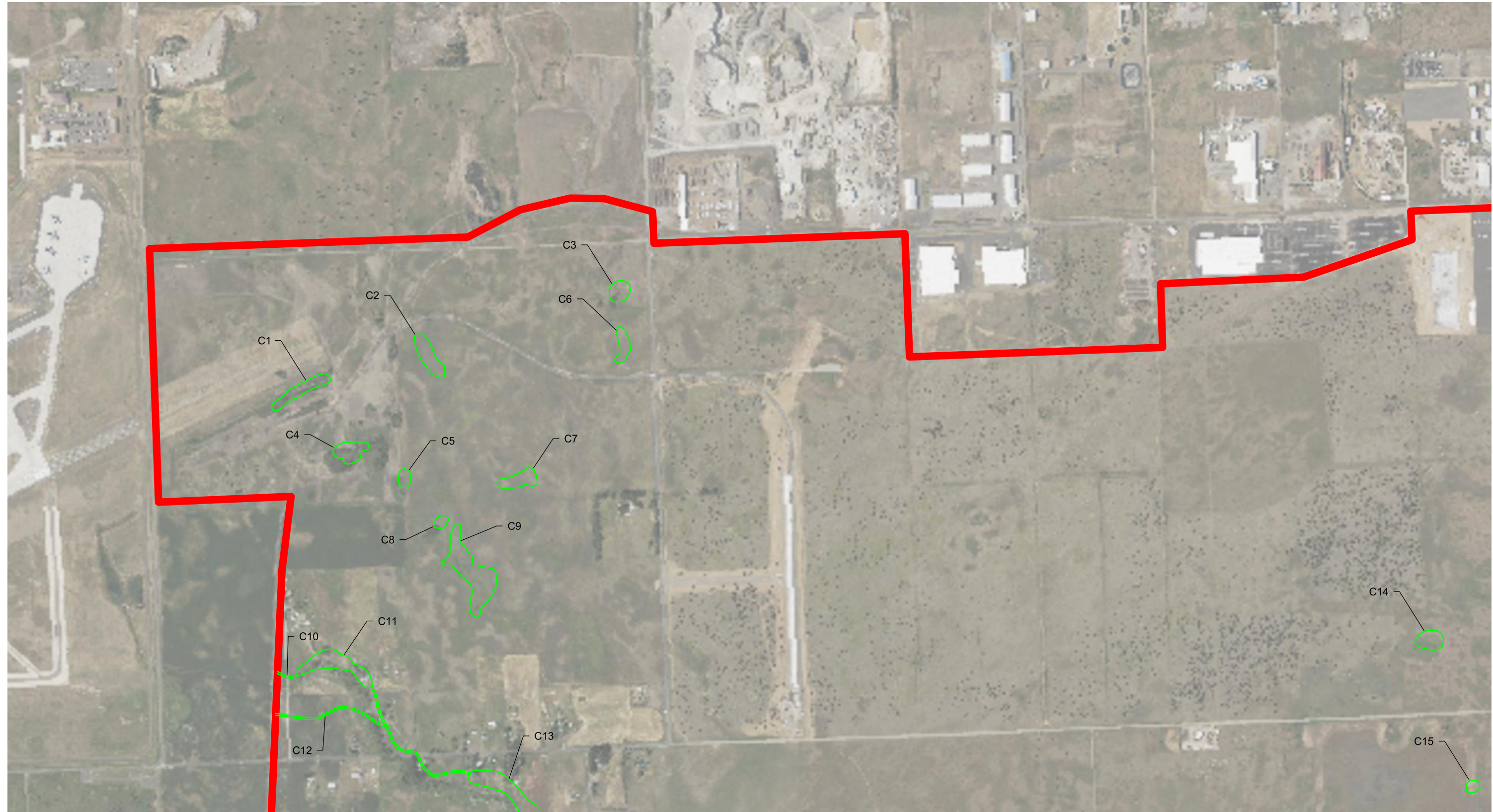
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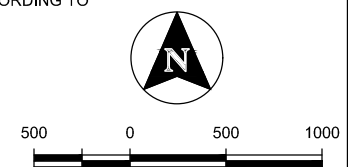


LEGEND

- 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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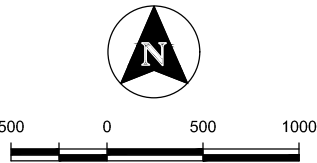


LEGEND

- APPROXIMATE WEST PLAINS PDA BOUNDARY
- APPROXIMATE WETLAND BOUNDARY

WEST PLAINS PDA
WETLAND INVENTORY EXHIBIT
FIGURE D

NOTE: ONLY WETLANDS WITHIN WEST PLAINS PDA ARE SHOWN.
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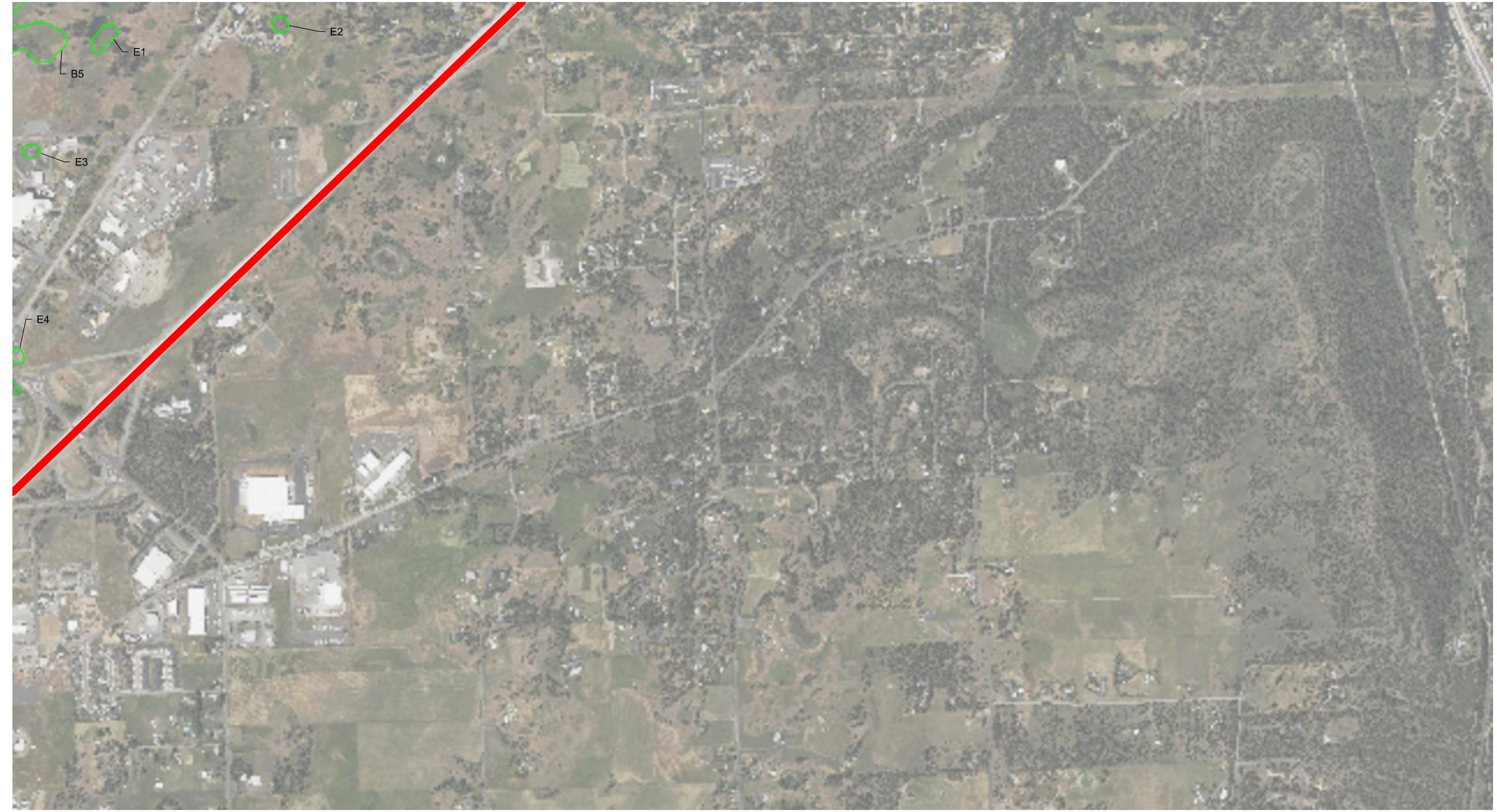
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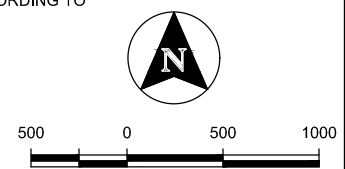


LEGEND

-  APPROXIMATE WEST PLAINS PDA BOUNDARY
-  APPROXIMATE WETLAND BOUNDARY

WEST PLAINS PDA
WETLAND INVENTORY EXHIBIT
FIGURE E

NOTE: ONLY WETLANDS WITHIN WEST PLAINS PDA ARE SHOWN.
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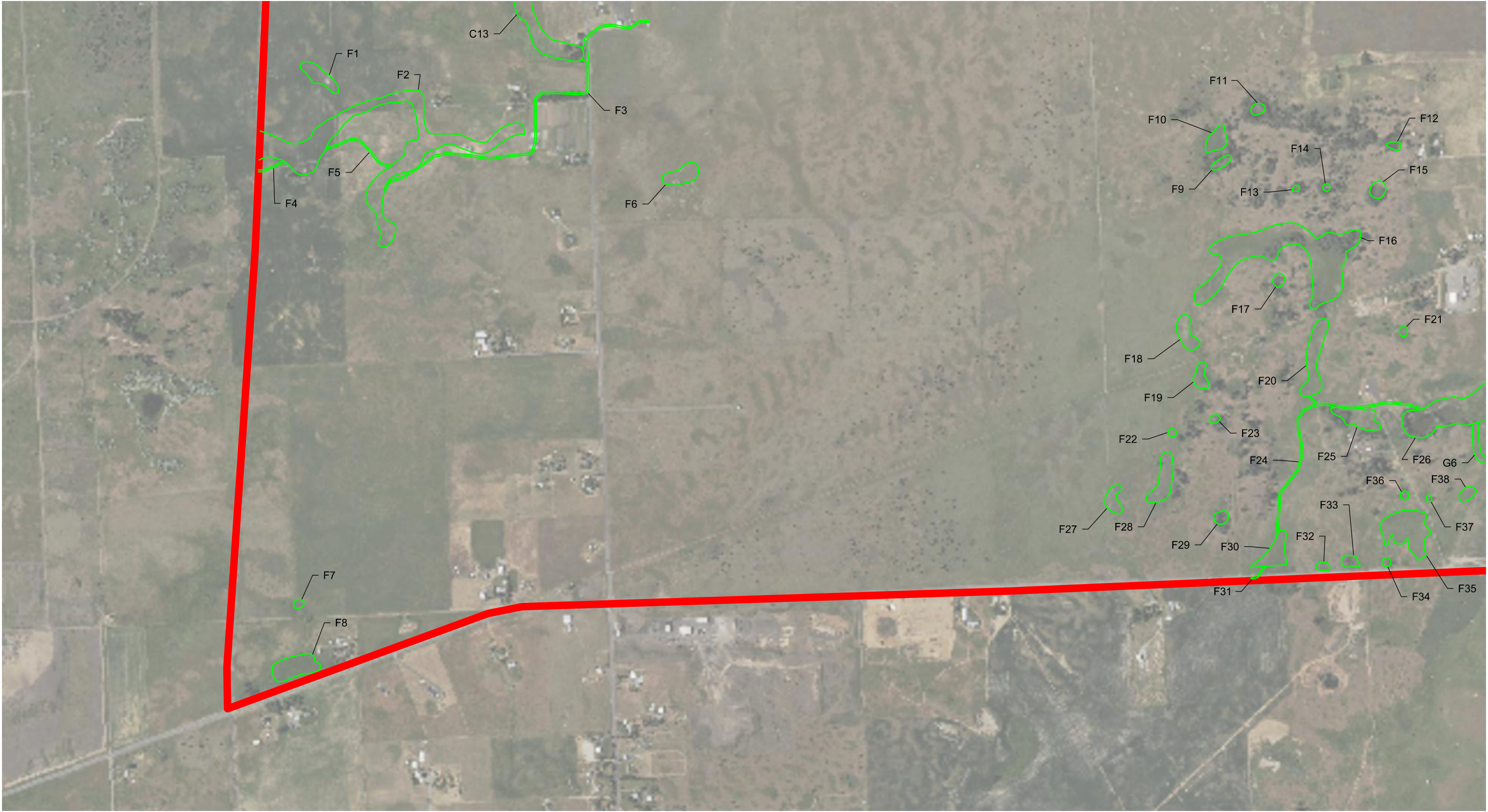
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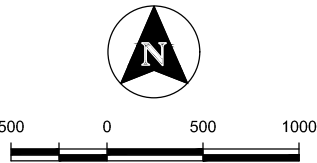


LEGEND

-  APPROXIMATE WEST PLAINS PDA BOUNDARY
-  APPROXIMATE WETLAND BOUNDARY

WEST PLAINS PDA
WETLAND INVENTORY EXHIBIT
FIGURE F

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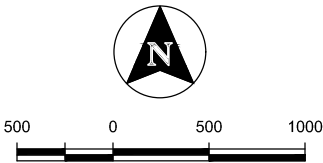


LEGEND

- 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	



T-O ENGINEERS

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