

City of Spokane (Jeff Donovan)

See attached.



**RIVERSIDE PARK
WATER RECLAMATION FACILITY**
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July 18, 2025

Stacey Callaway
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

RE: City of Spokane Comments on Safer Products Restriction and Reporting Rulemaking, Chapter 173-337 WAC

Dear Ms. Callaway,

Thank you for the opportunity to submit comments on the Safer Products Restriction and Reporting Rulemaking. We commend Ecology's efforts to identify and restrict the intentional use of per- and polyfluoralkyl substances (PFAS) through this updated rule. Curtailing the use of PFAS in these products will effectively reduce exposure to humans and the environment.

The City of Spokane (City), like many communities across our state and nation, is increasingly aware of the potential harm these chemicals pose. Protecting our Spokane River and Spokane Valley-Rathdrum Prairie Aquifer is a major priority for the City. As the largest water, wastewater, and stormwater utility in Eastern Washington, the residents and businesses we serve are directly affected by the wide-reaching impacts of PFAS released into commerce.

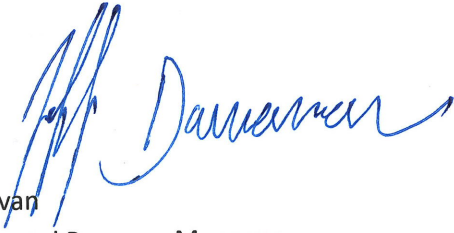
We are still only beginning to understand the extent to which PFAS exposure threatens public health and the environment. Removing these chemicals at the source is a key step in making sure PFAS are kept out of our waterways. Utilities such as ours act as passive receivers of these chemicals, as we do not produce or generate PFAS, but rather are left dealing with the results of their commercial use.

The City has invested more than \$450 million dollars in recent years to improve water quality in our region. These projects included controls within the Combined Sewer Overflow system, reduction of stormwater runoff, upgrades to our Riverside Park Water Reclamation Facility with state-of-the-art tertiary membrane treatment, and other improvements. Despite these investments, treating PFAS to very low levels is challenging, and in many cases, technically or economically infeasible with currently available utility-scale technologies. Managing them at the source through actions such as this is where the focus needs to occur.

We understand that a wholesale ban of PFAS is difficult to implement, particularly where viable alternatives are not yet available for certain uses. For that reason, we appreciate the State's targeted approach in this rulemaking to focus on eliminating PFAS from products where feasible substitutes do exist. As future rulemaking cycles take place under the Safer Products for Washington program, the City would appreciate a continued focus on consumer products with a high potential of entering water, wastewater, and stormwater systems.

Once again, thank you for the opportunity to comment on this rule-making effort. Should you have questions, comments or require additional information, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Donovan". The signature is stylized with a large, looped "J" and a cursive "Donovan".

Jeff Donovan
Environmental Program Manager