

Stevens County

The following comments are submitted by the Stevens County Commissioners on behalf of the over 45,000 people we represent.

In the RI/FS it is noted that two sites for disposal of debris and soil were considered, one in Spokane County and the other, the Stevens County Landfill in Kettle Falls. Please be aware that Stevens County has a Flow Control Ordinance requiring all materials for disposal generated inside of Stevens County MUST be disposed of at the Stevens County Landfill. (This would not apply if toxic material were of such a nature as to be required to go to a Toxic disposal site - which is not the case here). In addition, the extra miles traveled to go to Spokane County would contribute to undue wear and tear on the roads, and contribute to climate change.

In the preferred alternatives, discussion of drilling wells and pumping water at approximately 100 gpm from the ground water and treating, then dumping the water into the Colville River. 1) Will these wells be by application of appropriation of a water right? This volume would exceed any exemption in the statutes. 2) I do not see an impairment analysis in the study material - one should/would be required to avoid any negative impacts to the surrounding wells. 3) What is the consumptive use of this water withdrawal? There would be some loss in the treatment process and the pump and dump operation? 4) Studies show that pumping from the upper unconfined aquifer would have an effect on the lower aquifer. How will these effects be mitigated? 5) How will mitigation to the ground water be achieved, both upper and lower aquifer?

While we support cleaning up the environment in this area, there is also a concern that the Colville River Watershed is currently a "closed" basin and water is not available without full mitigation. We see no conversation in the documents about how this water will be mitigated, or the cost associated with buying or leasing of a water right for mitigation. If the water were to be pumped out of the ground water and returned via ground water injection, this would create a whole new scenario that would need further study to show no effects to the water quality.

We also question the dumping of this water into the Colville. We did not see an analysis of the water quality and permit needed that fits under the current TMDL's for the Colville River.

Again, where we support the cleanup of this site and the stoppage of further ground water contamination, we do not want to trade one problem for another and ask that the appropriate studies and measures be taken.

Thank you for allowing us to comment and we would welcome any further questions to clarify our comments.

Respectfully Submitted,

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