



It's Your River ♦ We Protect It

May 16, 2024

Jeremy Schmidt,
Washington Department of Ecology
4601 N. Monroe St.
Spokane, WA 99205

Dear Jeremy:

Spokane Riverkeeper is a non-profit, advocacy organization that works to protect the Spokane River Watershed. The mission of the organization is to protect and restore the health of the Spokane River watershed, defend access to clean water, and the opportunity for all communities to enjoy the benefits of a clean and healthy Spokane River. We appreciate the opportunity to provide comments on the Enforcement Order and Public Participation Plan for Spokane International Airport.

We support a thorough investigation and comprehensive clean up plan for the Spokane International Airport site. This clean up is long overdue and we appreciate your efforts to investigate the potentially liable parties involved. Given the complexity of the area, we understand that a complete assessment and evaluation of the site will take time and significant effort. We strongly support your approach to clean up any and all identified contaminants on the site during this process. It is important to recognize that this area has been used for intense industrial uses for decades that may require extensive, multifaceted clean up. Addressing all of the contaminants present is important to protect against further contamination of the groundwater in the area.

In light of preliminary results indicating surface water contamination at Mystic Falls/Indian Canyon Creek and Garden Springs Creek, we urge Ecology to consider impacts to surface water in its enforcement order. The Spokane River is the main source of water to the Spokane Valley Rathdrum Aquifer. In particular, Deep Creek enters the Spokane River in a section where the river loses water to the aquifer. Any PFAS contamination to Deep Creek and its tributaries on the West Plains would have the potential to contaminate the Spokane River and the Spokane Valley Rathdrum Aquifer.

Given the potential contamination to surface waters, should contamination be confirmed in the investigation, it is important to also test fish for PFAS contamination in the area. PFAS bioaccumulates in fish tissue, so bigger fish generally contain more chemicals. Studies indicate

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that eating just one fish contaminated with PFAS could equate to the same level of contamination as drinking contaminated water for one month. Even infrequent freshwater fish consumption can increase serum PFOS levels¹. Failing to test the fish for contamination would leave communities who rely on the fish in our River vulnerable to increased health risks caused by PFAS. Please consider requiring fish tissue samples should related contamination be found in the Spokane River.

It is important to recognize the widespread, long-term effects that this site's contamination has had on the West Plains, and region overall. Taking significant steps to ensure all contaminants on the site are adequately addressed is required to protect the health of future generations in the region. Ensuring that the measures implemented protect some of the most vulnerable populations in our region should be a top consideration in addressing this contamination. We hope you will continue to monitor developments in this matter as they relate to surface water and aquatic life, and take prompt action to remediate any potential contamination.

Respectfully submitted,

Katelyn Scott, Esq.
Water Protector
Spokane Riverkeeper

References

1. Barbo, N., Stoiber, T., Naidenko, O. V., & Andrews, D. Q. (2023). Locally caught freshwater fish across the United States are likely a significant source of exposure to PFOS and other perfluorinated compounds. *Environmental Research*, 220, 115165. <https://doi.org/10.1016/j.envres.2022.115165>

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