SPOKANE RIVERKEEPER®

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March 9, 2026

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

Re: Comments on Spokane International Airport Agreed Order and Public Participation Plan

Dear Jeremy,

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 Dragoon 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.

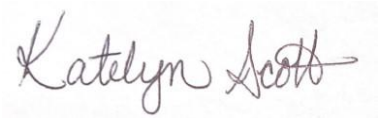
Recommendations

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.

Respectfully submitted,



Katelyn Scott, Esq.
Water Protector

References

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