



PUBLIC WORKS
808 WEST SPOKANE FALLS BLVD.
SPOKANE, WASHINGTON 99201

May 7, 2021

Ms. Laurie Morgan
Water Quality Program
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Re: City of Spokane Comments on Revised Critical Aquifer Recharge Area Guidance

Dear Ms. Morgan:

This letter is in response to recent notice from Washington State Department of Ecology (DOE) request inviting public review and comment on the Critical Aquifer Recharge Area Guidance. The City of Spokane appreciates the opportunity to provide comments and is an advocate for environmental responsibility and protection. The City, through its utilities and related functions, promotes strategies to protect groundwater resources under the Growth Management Act.

The City has reviewed the proposed amendments to the Critical Aquifer Recharge Area Guidance and offers the following comments.

At page 33, under *Step 2: Analyze the susceptibility of the natural setting where groundwater occurs*, contains a link listed as "Spokane County: Spokane Aquifer", and lists this as "Spokane County Joint Aquifer Board" – the correct name of this entity is the *Spokane Aquifer Joint Board* (SAJB); this should be corrected.

In Section 6, starting at page 55 - *Working with State and Federal Laws and Rules* should be revised to include references to the Washington State Department of Natural Resources. In particular surface mining, gravel pits. RCW 78.44.091 specifically calls out local governments in approving reclamation plans. The City thinks it important for local agencies and planners to have resources available and understand their responsibilities/role in gravel pit management and potential impacts to ground water sources.

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Thank you again for the opportunity to offer these initial comments on the proposed revised critical aquifer recharge area guidance.

Sincerely,



Marlene C. Feist
City of Spokane Public Works Director

MCF/rh

cc: Johnnie Perkins, City Administrator
Elizabeth Schoedel, Assistant City Attorney
Doug Greenlund, Water Quality Coordinator