



January 30, 2013

Kevin J. Twohig  
Spokane Public Facilities District  
720 West Mallon Avenue  
Spokane, Washington 99207-5811

**SENT VIA EMAIL (ktwohig@spokanepdf.org )**

**RE: Comments on Checklist and DNS**

Dear Kevin,

These comments are submitted on behalf of the Center for Justice on the SEPA Checklist and DNS for expansion of the Spokane Convention Center.

**Checklist:**

**Question A-10:** The list of approval and permits should include a Washington Department of Ecology construction stormwater NPDES permit and compliance with the City of Spokane's stormwater requirements. Information about the requirement of these permits is available at <http://www.spokaneriver.net/spokanestormwater/book.swf>.

**Question B-1(f):** This section should discuss the requirements of the Ecology and City permitting and how these measures will be utilized to minimize stormwater discharge. No discharge to the Spokane River of construction stormwater will be allowed.

**Question B-1(h):** Please consider adopting low impact development (LID) measures to eliminate or minimize stormwater run-off associated with the site. These include the use of swales, rain gardens, roof-top gardens, and the use of permeable materials (such as permeable concrete or asphalt).

**Question B-3(b)(3):** Please consider alternatives to discharge including the implementation of low impact development (LID) measures to eliminate or minimize stormwater run-off associated with the site. Moreover, any discharge must not cause or contribute to state water quality violations per the requirements of the Clean Water Act.

**Question B-3(c)(1):** This section should discuss the requirements of the Ecology and City permitting and how these measures will be utilized to minimize stormwater discharge. No discharge to the Spokane River of construction stormwater will be allowed.

**Question B-6(a):** Has the PFD considered designing a facility that could obtain LEED certification? The PFD should consider such design.

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**Question B-7:** The checklist lacks any discussion of the consistency of this project with existing MTCA requirements for the site, including consistency with institutional controls and the approved management plans for the site.

**Question B-8:** The Center for Justice incorporates its previously submitted comments by reference – the project must comply with the requirements of the City of Spokane Shoreline Management Plan.

**Question B-10:** What is appropriate artwork in regards to the replacement of the Jody Pinto?

**DNS:** It is unclear what specific mitigation measures will be employed to avoid stormwater impacts to the Spokane River from increase development (checklist indicates that the existing stormwater discharge may be used increasing the stormwater discharge amount into the river) and how impacts associated with the MTCA cleanup at the site will be address to prevent further recontamination associated with construction at the site. Additional clarification should be provided.

I appreciate the opportunity to comment on this.

Sincerely,

CENTER FOR JUSTICE

A handwritten signature in black ink, appearing to read 'REI', with a long horizontal stroke extending to the right.

Rick Eichstaedt  
Executive Director