



# Spokane Tribal Natural Resources

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To whom it may concern,

The Spokane Tribe of Indians Department of Natural Resources has attended the last two meetings regarding the Little Spokane River watershed planning efforts (WRIA 55). There are concerns regarding the projected growth rate of Spokane County within the Little Spokane River watershed. Within the draft memorandum of the Evaluation of Future Exempt Well Demand it states that although the actual growth rate of Spokane County within WRIA 55 between 2001-2017 was 1.06%, the county used the smaller projected OFM growth rate of 0.74%. Considering the 2018 Population Trends report produced by the OFM calculated a growth rate of 1.63% in Spokane County and 1.4% in Eastern Washington, the growth rate used by Spokane County to estimate exempt wells is blatantly underestimating what is actually occurring within the watershed. In the 2012 and 2017 GMA population projections, predictions of growth rates are 1.15% and 1.08%, respectively.

Also, within the draft memorandum of the Evaluation of Future Exempt Well Demand, it states the projected 20-year growth in Spokane County was 1923 homes using the 1.06% growth rate, where it was projected to be 1602 homes using the 0.74% growth rate provided by the county. This creates a difference of 321 homes predicted to be built in the next 20 years in Spokane County. When looking at the Pend Oreille County growth projections, there is an estimated 332 homes that will be built in the next 20 years. In Table 11 in the draft memorandum, Pend Oreille County estimates a projected consumptive outdoor use of 166 acre-feet per year (afy), with lower outdoor water usage on average than home owners in Spokane County. Using the lower growth rate of 0.74% in Spokane County instead of the actual average growth rate of 1.06% is underestimating projected consumptive outdoor water use by a minimum of 166 afy, which will impact Little Spokane watershed stream flows during critical low flow periods.

The Spokane Tribe historically relied on the salmon and steelhead that inhabited the Little Spokane River and its tributaries for their subsistence. Redband trout currently inhabit the Little Spokane River watershed, and are labeled as a species of concern and a sensitive species by U.S.F.W.S., U.S.F.S., B.L.M., and W.D.F.W.. Today the tribe is trying to rebuild their first foods by protecting and enhancing redband trout waters, and reestablishing salmon within the tribes historical fishing grounds. It is important to maintain the Little Spokane River watershed as it is one of the last cold-water refuges within the greater Spokane River watershed.

The adjoining WRIA 59 is currently using their actual average growth rate from 2001-2017, which accounts for both high growth and low growth periods. The Spokane Tribe's Department of Natural Resources requests that Spokane County uses the actual average 2001-2017 growth rate in order to protect waters in the Little Spokane River drainage for the conservation of these important fish species.

Respectfully,

A handwritten signature in black ink that reads "C. Flanagan". The signature is written in a cursive style with a large, looped "C" and a stylized "Flanagan".

Casey Flanagan  
Water and Fish Project Manager  
Spokane Tribal Department of Natural Resources