

August 9, 2017

Leroy Eadie Director, Spokane Parks & Recreation 808 West Spokane Falls Boulevard Spokane, WA 99201-3333

Sent by email to: leadie@spokanecity.org

**RE:** Avista Transmission Line Rebuild

Dear Leroy:

I am writing on behalf of Friends of the Bluff ("FOB") to request your assistance in revisiting the City of Spokane's ("City") determination that Avista's proposed transmission line rebuild on the High Drive Bluff is categorically exempt under SEPA. The Memorandum of Understanding between the City and FOB obligates the City to discuss potential developments with FOB so we can work together to avoid or mitigate activities that adversely affect the Bluff. We realize that building clear lines of communication between the City and FOB is a work in progress, but excluding FOB from a decision process that will result in a new, permanent fixture on the Bluff is not something the City or FOB should find acceptable. Our membership remains skeptical about the events leading up to the unauthorized road on the Bluff earlier this year, so it is critical that the City evaluate the proposed rebuild in a transparent and thorough manner. To that end, I would like to meet with you soon, in the next week, to discuss how to resolve our concerns.

FOB has serious reservations about the City's determination that the proposed rebuild qualifies for a categorical exemption. The power line did not run through a popular public park when it was constructed 70 years ago, and the information provided by Avista and reviewed by the City does not demonstrate that the proposed rebuild is an appropriate alternative. The proposed rebuild includes a projected 500% increase in power transmission capacity and electromagnetic radiation, 100% increase in power cable size, 15-30 foot increase in pole height, installation of 42 new poles, and new fiber optic connectivity. These changes will result in previously unevaluated and unmitigated health and safety impacts, as well as new adverse impacts to homeowners, trail users, and wildlife. Although we appreciate Avista's efforts to avoid new road construction, the use of helicopters over many weeks raises safety, wildlife, and recreational concerns that have not been evaluated.

To be clear, FOB does not oppose Avista's proposed rebuild at this time. We just want the City to do the analysis that SEPA requires in order to identify a path forward that meets Avista's objectives and protects the Bluff and all who use it. At a minimum, this analysis should include an evaluation of the modifications and potential adverse impacts described above and an alternatives assessment, e.g. burying the power lines, replacing existing power poles with poles of the same height and location, use of a single pole transmission line, etc.

FOB also has significant concerns about Avista's application for a shoreline exemption, so let's plan on discussing that issue as well.

Please email me at <u>pkeegan610@gmail.com</u> or give me a call at (720) 331-0018 to set up a meeting.

Regards,

Patrick Keegan

Pat Regan

President, Friends of the Bluff

Cc: Tami Palmquist, City of Spokane Planning & Development, <u>tpalmquist@spokanecity.org</u>
Bruce Howard, Avista, <u>bruce.howard@avistacorp.com</u>