

To: South Hill Bluff Restoration Core Team (BluffRestore@avistacorp.com)
From: Jim Wilson, President, Friends of the Bluff
Date: May 11, 2017
Re: Friends of the Bluff Comments on Draft Restoration Plan

A month ago today a bulldozer and backhoe carved a mile long road across the Bluff, stunning all of those that enjoy having this amazing conservation and recreation area in our community. Friends of the Bluff applauds the decision of Avista and the Spokane City Parks and Recreation to move ahead quickly to repair this damage and restore the road cut to its natural terrain and vegetation. The draft plan is very well done but believe it can be strengthened through this draft review and comment process.

Friends of the Bluff invited those on our mailing list to participate in the review process, and to make recommendations to our Board of Directors. Below is a summary of the comments we received and agreed upon. We have listened to the community we represent and there is overwhelming support for complete and immediate restoration.

1. Permits: Avista should provide a detailed timeline for applying for an obtaining all required permits. The road disaster was a result of failing to obtain adequate permits prior to acting. Avista should be particularly sensitive to this issue and should commit to apply for all permits prior to the completion of the remediation. It is our understanding that only 1 permit of three (the grading permit) will actually be applied for prior to the initiation of the restoration activity. Friends of the Bluff believes a detailed listing of the expected comment periods, the point of contact for the permits (Shoreline and Erosion Control) should be published and a commitment to an open public process should be published prior to any restoration work being initiated.
2. Vehicle Turn-arounds: The draft plan that was provided to the stakeholder group differs in the description of the use and building of turnarounds for trucks and equipment. We understand the need to site turnarounds as it is implausible to believe that it would be effective or efficient to back each truck or piece of machinery out 7000' feet. Avista should provide this detail to the public and should plant markers to indicate the equipment turnarounds. No additional cuts into the hillside should occur to create vehicle turnarounds. The topsoil that will be brought in to supplement native soils should be placed below the road where these equipment turnouts will be located to protect as much as possible the intact soils and plants. The equipment turnarounds should be located within the Avista right of way whenever possible.
3. Minimizing additional damage:
 - a. All work should use rubber tracked or tired equipment.
 - b. If steel tracked equipment must be used, this equipment should be kept to the area previously damaged.
 - c. Keep the tracks and tires on the existing road during restoration, thus minimizing additional damage.
 - d. Make every effort to save the native vegetation that has been buried under the fill. In the minor disturbance and moderate disturbance areas, laborers with rakes and shovels should be used rather than large heavy equipment.

4. Plantings proposed: Add additional species of native grass. The plan only calls for 3 and should include 2 or more additional species.
5. Weed control: External fill will be brought in to supplement the existing soil that was displaced. Use only weed free topsoil. Add Rush Skeletonweed and Common Bugloss to the list of noxious weeds that should be controlled.
6. Trees: We understand that approximately 900 Ponderosa Pine seedlings will be used to replace existing trees with an expectation that this is 3 times those that were destroyed. Avista and their contractor provide anecdotal evidence that these small trees have a higher survival rate. While these small seedlings may be more resilient, this is conjecture that has not been supported by academic or industry research to support this statement. Clearly these small seedlings are substantially less expensive. A restoration standard of planting the lowest cost seedlings may be appropriate where Avista has a legal right of Way and is restoring lands that they have usage and clearance rights. The vast majority of the roadcut is on public or private land with no valid easement. Planting small 12" seedling trees will deny the public from restoration for a longer period of time than more mature trees in the 6' to 10' range. These seedlings will grow at best 1-2' per year and in shady locations perhaps half that. A second planting will likely be required in the fall. A detailed assessment of mortality should be categorized and reported to the city and stakeholders prior to the second planting. At that point, a decision should be made to transplant larger and yes more expensive trees.
7. Monitoring – the draft plan has the city monitoring for approximately 1 year. We believe this should be for at least 2 complete years. We think any monitoring plan should have direct involvement of the Friends of the Bluff.

Thanks again for providing this opportunity for comment. Please feel free to call or email if you would like to discuss these comments.

Sincerely,

Jim Wilson
Friends of the Bluff Board President