



1411 East Mission Avenue
PO Box 3727
Spokane, WA 99220-3727

October 13, 2016

Mr. David Dilks, LimnoTech
501 Avis Drive
Ann Arbor, MI 48108

RE: Avista's Comments on the Draft Comprehensive Plan to Reduce Polychlorinated Biphenyls (PCBs) in the Spokane River

Dear Mr. Dilks:

Avista appreciates the opportunity to provide the following comments on the Draft Comprehensive Plan to Reduce Polychlorinated Biphenyls (PCBs) in the Spokane River (Comprehensive Plan, dated September 15, 2016).

The Section 5.2.1 discussion of the Upriver Dam sediment cleanup should be more complete. Specifically, the discussion should clarify that Avista completed scheduled monitoring of the engineered cap during Year 2 (2008) and Year 4 (2010) following cap construction. Bathymetric comparisons, visual observations, and chemical analyses performed during the monitoring events verified the integrity and protectiveness of the cap, including through a 25-year flood event.

We appreciate the level of effort that is evident in this document as well as the Spokane River Regional Toxic Task Force's work to date. However, it is unclear how comments have been, and will be, incorporated into the draft document. For example, is there a formal process for working through and determining which comments/positions are included in the case of contradictory comments?

Please feel free to contact me at (509) 495-4643 if you have any questions or wish to discuss our comments.

Sincerely,

A handwritten signature in blue ink, which appears to read "Meghan Lunney". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Meghan Lunney
Aquatic Resource Specialist