ATT 2

Gmail

Sondra Collins <sonnysalmon9@gmail.com>

Drumheller Springs NHR Form, wetland status updated, and contacts for proposed townhouse developments

1 message

Sondra Collins <sonnysalmon9@gmail.com> Thu, Jun 12, 2025 at 10:22 AM
To: Randy Abrahamson <randya@spokanetribe.com>, Sondra Collins <sonnysalmon9@gmail.com>, tschmidt@cityofspokane.org, Dennis Flynn <dpflynn@hotmail.com>, Anne Marie Liebhaber <amliebhaber@gmail.com>, "Owen, Melissa" <mowen@spokanecity.org>

Randy,
Here is the National Historic Registry for Drumheller Attached as requested.
Anne Marie, thank you sooo much for your assistance.

Also as requested is the following proposed townhouse project names and contacts across the street from Drumheller Springs Park/Conservation Area:

1. City of Spokane Parks and Recreation -Nick Hamad email: nhamad@spokanecity.org

2. "ASH PLACE PRELIMINARY LONG PLAT" PERMIT #Z23-587PPLT
CONTACT:-City of Spokane Planning Dept- Melissa Owen. mowen@spokanecity.org.

3."PRE APPLICATION PROJECT SITE PLAN" "DALTON RD TOWNHOUSES: PERMIT #B-24M0094PDEV AND # B-L4M0094PDEV. CONTACT: City of Spokane Planning Dept. Tavis Schmidt - tschmidt@spokanecity.org

The actual site area has 3 wetland units (WU):
WU-1. the Drumheller Creek and Spring rated a Category I 250ft Buffer requirement each side of the Creek.
WU-2. the ponded area and all old growth Pacific Willows rated a Category I with a 250ft Buffer requirement.
WU-3. This is the outlying area surrounding the old growth pacific willows is considered Camas Wet Meadow Vernal Pools and are considered a Category II based on special characteristics with a 200ft Buffer requirement.

This is to important of a prehistoric and historic encampment site to disrupt with blasting of basalt and more impact to this 14acres area would be devastating.

I believe they were working on a "Discovery Center and Intrepretive Center as stated in the NHR attached in 1969, but there is no building of that sort onsite. I think this may be the way to continue togetherness.

We only survey the eastern 1/2 of the Drumheller as that is the area which the proposed townhouse developments will encroach into the Camas Wetland Meadow/Vernal Pools Area 200ft wetland buffer.
Both proposed projects will encroach into the Wetland Unit 3-200ft Critical Area Wetland Buffer (CAWB). This buffer is shown on the "Wetlands Boundary and Buffers Map" attached as the "Orange Line".

We. ECOS USA, are now preparing the "Certified Wetland Report" and will be released for review through the "Client": Denise Flynn (on behalf of Concerned Companions of Drumheller Conservation Area).

PLEASE FEEL FREE to reach out if you have any further inquires and/or questions.
ta,
Sondra Collins DBA ECOS USA
PO BOX 443
Loon Lake, WA. 99148
tel: 509-710-8329
sonnysalmon9@gmail.com

--
Sondra Collins

Riparian Ecologist
ECOS USA
Cell: (509)-710-8329

2 attachments

APPELLANT EXHIBIT 1.pdf
3728K

Wetlands Boundary and Buffers Map.pdf
2134K

Gmail Sondra Collins <sonnysalmon9@gmail.com>

Drumheller Priority Habitat, Species, Historical Info

2 messages

Anne Marie Liebhaber <amliebhaber@gmail.com> Tue, Jun 3, 2025 at 9:48 AM
To: Sondra Collins <sonnysalmon9@gmail.com>

Hi Sondra:
I am attaching my legal exhibits for reference regarding "points of evidence" as you requested.
Exhibit 1 = Drumheller History, last two pages in particular
Exhibit 10 = Drumheller history
Exhibit 6 = Priority Habitat Map from WDFW
Exhibit 7 = Priority Species Rocky Mountain Mule Deer 12-15 member herd migrates/ resides in Drumheller
Exhibit 8 = Priority Species Townsend's Big Eared- Bat (cliff, talus, riparian area favored habitat)
Exhibit 11 = Drumheller Wetland Map from Spokane County Interactive Map Viewer

6 attachments

APPELLANT EXHIBIT 1.pdf
3728K

APPELLANT EXHIBIT 6.pdf
1730K

APPELLANT EXHIBIT 7.pdf
1934K

APPELLANT EXHIBIT 8.pdf
1813K

APPELLANT EXHIBIT 10.pdf
755K

APPELLANT EXHIBIT 11.pdf
571K

Sondra Collins <sonnysalmon9@gmail.com> Thu, Jun 12, 2025 at 9:39 AM
To: Anne Marie Liebhaber <amliebhaber@gmail.com>, Sondra Collins <sonnysalmon9@gmail.com>

Anne Marie,
Thank you sooo much, I'll check them out. Sondra Collins DBA ECOS USA .
[Quoted text hidden]
--
Sondra Collins
Riparian Ecologist
ECOS USA
Cell: (509)-710-8329

ATTACHMENT 2

Gmail

Sondra Collins <sonnysalmon9@gmail.com>

DRUMHELLER SPRING PARK CITY OF SPOKANE, permission for Certified Wetland Survey TIME SENSITIVE

Hamad, Nicholas <nhamad@spokanecity.org> Thu, May 8, 2025 at 9:02 AM
To: Sondra Collins <sonnysalmon9@gmail.com>
Cc: "Vorderbrueggen, Al" <avorderbrueggen@spokanecity.org>, "Strong, Carl" <cstrong@spokanecity.org>, "Owen, Melissa" <mowen@spokanecity.org>, "sonnysalmon9@gmail.com" <sonnysalmon9@gmail.com>

Hi Sondra,

Thanks for the clarification.

Consider this email an approval to conduct a wetland delineation on the City's Drumheller Springs Park property, so long as you send a copy of the delineation to Spokane Parks (you can send to my attention), and so long as the work is conducted according to the standard acceptable practices of your profession.

Thank you for reaching out and good luck!

[Quoted text hidden]

City of Spokane PARKS & RECREATION

image002.png
21K

+ ✓ DNR TRAX - WATER Type Map Completed Online 5/12/2025
Contact Dept of Ecology Groundwater (509) 456-2926.
Available Upon Request (509) 329-3400
+ Type F + N, on site. Ref file: WaterTypeMap1.pdf >
waterbodies. 2.5" " " " 2.jpeg >

✓ S. Collins
EDS NSA
5/10/2025

Spokane Municipal Code

***Note: Many local criminal codes can now be located under Chapter 10.60 SMC while others are now cited under the Revised Code of Washington (RCW), which was incorporated into the municipal code in 2022. (See SMC 10.58.010). Code Enforcement, including Noise Control and Animal Regulations are located in Chapters 10.62 through 10.74.

Title 17E Environmental Standards

Chapter 17E.070 Wetlands Protection

Section 17E.070.110 Wetland Buffers

A. Standard Buffer Zone Widths.

Wetland buffer zones shall be required for all regulated activities adjacent to wetlands. Any wetland created, restored, or enhanced as compensation for approved wetland alterations shall also include the standard buffer required for the category of the created, restored, or enhanced wetland. All buffers shall be measured from the wetland boundary as surveyed in the field pursuant to the requirements of SMC 17E.070.030. The width of the wetland buffer zone shall be determined according to the rating assigned to the wetland in accordance with SMC 17E.070.100 and consistent with Wetlands in Washington State, Volume 2, Protecting and Managing Wetlands, Guidance on Buffers and Ratios (Appendix 8-D) as revised, for wetland category, intensity of impacts, wetland functions, habitat scores, or special characteristics. Standard buffer widths will be determined based on an evaluation of the following:

1. conditions of the wetland;

2. conditions of the buffer;

3. proposed land uses adjacent to the buffer; and

4. the functions intended to be protected.

B. Wildlife habitat function is the most susceptible to developmental change and requires the greatest buffer protection. Protection of wildlife habitat functions require twenty five to seventy five feet for wetlands with minimal habitat functions and low intensity land uses adjacent to the wetlands, fifty to two hundred feet for wetlands with moderate habitat function and moderate or high intensity land use adjacent to the wetlands, and one hundred fifty to two hundred fifty plus feet for wetlands with high habitat functions depending on the intensity of the adjacent land use. The width of the wetland buffer zone shall be determined from one of the following two alternatives:

1. Alternative 1.

Unless SMC 17E.070.110(3) (Table 17E.070.110-4) applies, width based solely on wetland category as follows:

Table 17E.070.110-1	
Wetland Category	**Buffer Width**
Type I	250 ft
Type II	200 ft
Type III	150 ft
Type IV	50 ft

2. Alternative 2.

Alternative 2 provides three buffer widths based on habitat scores. Habitat score refers to the quality of physical structures such as vegetation, open water, and connections to other wildlife habitats that are necessary for a wide range of species, including birds, mammals, and amphibians. Where more than one width applies based on score for function or based on special characteristics, the calculation providing the widest buffer shall be used. Widths are based on wetland category, intensity of impacts from proposed changes in land use, and wetland functions or special characteristics. Land use intensity shall be determined as follows:

Table 17E.070.110-2. Types of proposed land use that can result in high, moderate, and low levels of impacts to adjacent wetlands.	
Impact from Proposed Change in Land Use	**Types of Land Use Based on Common Zoning Designations**
High	Commercial, Industrial and Institutional Residential (more than 1 unit/acre) High-intensity recreation (golf courses, ball fields, etc.) Conversion to high intensity agricultural (dairies, nurseries, greenhouses, etc.) Hobby Farms
Moderate	Residential (1 unit/acre or less) Moderate-intensity active open space (parks with biking, jogging, etc.) Conversion to moderate intensity agriculture (orchards, hay fields, etc.) Paved trails Building of logging roads Utility corridor with access/maintenance road Forestry (cutting of trees only)
Low	Passive open space (hiking, bird-watching, etc.) Unpaved trails Utility corridor without road or vegetation management.

Table 17 E.070.110-3			
Category of Wetland	**Land Use with Low Impact**	**Land Use with Moderate Impact**	**Land Use with High Impact**
I	125 ft.	190 ft.	250 ft.

II	100 ft.	150 ft.	200 ft.
III	75 ft.	110 ft.	150 ft.
IV	25 ft.	40 ft.	50 ft.

3. If a Type I wetland is classified with at least one of the following special characteristics the following buffer table shall apply:

Table 17E.070.110-4

Wetland Characteristics	Buffer Widths by Impact of Proposed Land Use (apply most protective if more than one criterion is met)	Other Measures Recommended for Protection
Wetlands of High Conservation Value	Low - 125 ft Moderate – 190 ft High – 250 ft	No additional surface discharges to wetland or its tributaries No septic systems within 300 ft Restore degraded parts of buffer
Bogs	Low - 125 ft Moderate – 190 ft High – 250 ft	No additional surface discharges to wetland or its tributaries Restore degraded parts of buffer
Forested	Buffer size to be based on score for habitat functions or water quality functions	If forested wetland scores high for habitat, need to maintain connectivity to other natural areas Restore degraded parts of buffer
Alkali	Low – 100 ft Moderate – 150 ft High – 200 ft	No additional surface discharges to wetland or its tributaries Restore degraded parts of buffer
High level of function for habitat (score for habitat 8 – 9 points)	Low – 100 ft Moderate – 150 ft High – 200 ft	Maintain connections to other habitat areas Restore degraded parts of buffer
Moderate level of function for habitat (score for habitat 5 - 7 points)	Low – 75 ft Moderate – 110 ft High – 150 ft	No recommendations at this time
High level of function for water quality improvement (8 - 9 points) and low for habitat (less than 5 points)	Low – 50 ft Moderate – 75 ft High – 100 ft	No additional surface discharges of untreated runoff
Not meeting any of the above characteristics	Low – 50 ft Moderate – 75 ft High – 100 ft	No recommendations at this time

C. Increased Wetland Buffer Zone Width.

The City may require increased buffer zone widths on a case-by-case basis as determined by the director when a larger buffer is necessary to protect wetland functions and values. This determination shall be supported by appropriate documentation showing that it is reasonably related to protection of the functions and values of the wetland. The documentation must include but not be limited to the following criteria:

1. The wetland is used by a plant or animal species listed by the federal government or the state as endangered, threatened, sensitive, or documented priority species or habitats, or essential or outstanding potential habitat for those species, or has unusual nesting or resting sites such as heron rookeries or raptor nesting trees; or

2. The adjacent land is susceptible to severe erosion and erosion control measures will not effectively prevent adverse wetland impacts; or

3. The adjacent land has minimal vegetative cover or slopes greater than thirty percent.

D. Reduction of Standard Wetland Buffer Zone Width.

The City may reduce the standard wetland buffer zone width on a case-by-case basis as determined by the director, consistent with Wetlands in Washington State, Volume 2, Protecting and Managing Wetlands, Guidance on Buffers and Ratios (Appendix 8-D) as revised, or wetlands that score:

1. Moderate or high for habitat (five points or more for the habitat functions) the width of the buffer can be reduced if the following criteria are met:

   a. A relatively undisturbed vegetative corridor of at least one hundred feet in width is protected between the wetland and any other priority habitats; and

   b. The protected area is preserved by means of easement, covenant, or other measure;

   c. Measures identified in SMC 17E.070.110(C)(2) (Table 17E.070.110-5) are taken to minimize the impact of any proposed land use or activity

2. Less than five points for habitat, the buffer width can be reduced to that required for moderate land-use impacts by applying the following measures to minimize the impacts of the proposed land uses or activities:

Table 17E.070.110-5

Disturbance	Examples of Measures used to Minimize Impacts
Light	Direct lights away from wetland
Noise	Locate activity that generates noise away from wetland
Toxic runoff	Route all new untreated runoff away from wetland while ensuring wetland is not dewatered, establish covenants limiting use of pesticides within 150', may apply integrated pest management
Stormwater runoff	Retrofit stormwater detention and treatment for roads and existing adjacent development, prevent channelized flow from lawns that directly enters buffer

Change in water regime	Infiltrate or treat, detain, and disperse into buffer new runoff from impervious surfaces and new lawns
Pets and human disturbance	Use privacy fencing; plant dense vegetation to delineate buffer edge and to discourage disturbance using vegetation appropriate for the ecoregion; place wetland and its buffer in a separate tract
Dust	Use best management practices to control dust

E. Standard Buffer Width Averaging.

Wetlands may contain significant variations in sensitivity due to existing physical characteristics that may justify buffer width averaging. Standard wetland buffer zones may be modified by averaging buffer widths or a combination of averaging and reduction. Wetland buffer width averaging shall be allowed only where the applicant demonstrates all of the following:

1. Averaging will provide the necessary biological, chemical and physical support necessary to protect the wetland in question, taking into account the type, intensity, scale and location of the proposed land use;

2. The land uses causing the least disturbance would be located adjacent to areas where buffer width is reduced and that such land uses are guaranteed in perpetuity by covenant, deed restriction, easement, or other legally binding mechanism;

3. The total area contained within the wetland buffer after averaging is not less than that contained with the standard buffer prior to averaging. In no instance shall the buffer width be reduced by more than fifty percent of the standard buffer or be less than twenty-five feet.

F. Wetland Buffer Maintenance.

Except as otherwise specified wetland buffer zones shall be retained in their natural condition and free from mowing or other cutting activity, except for the removal of noxious weeds. Where buffer disturbances have occurred before or during construction, revegetation with native vegetation shall be required.

G. Permitted Uses in a Wetland Buffer Zone.

Regulated activities shall not be allowed in a buffer zone except for the following:

1. Activities having minimal adverse impacts on buffers and no adverse impacts on wetlands. These may include low-intensity, passive recreational activities such as trails, non-permanent wildlife watching blinds, short-term scientific or education activities, and sport fishing or hunting. Pervious pedestrian trails may be allowed in a wetland for minor crossings only and with minimal impacts. Trails may be allowed in the outer twenty five percent of a wetland buffers and should be designed to avoid removal of significant trees. Such trails are limited to no more than five feet in width.

2. Storm water management facilities, including biofiltration swales, designed according to the City of Spokane Stormwater Management Manual as revised, and chapter 17D.060 SMC Stormwater Facilities, if no reasonable alternative on-site location is available within the meaning of subsection SMC 17E.070.130, and if sited and designed so that the buffer zone as a whole provides the necessary biological, chemical and physical protection to the wetland in question, taking into account the

scale and intensity of the proposed land use. Biofiltration swales will take into account the scale and intensity of the proposed land use, be located in the outer twenty five percent of a Category III or IV wetland buffer provided that no other location is feasible, and will not degrade the functions and values of the wetland or its buffer.]

H. Structural Setbacks from Buffers.

Unless otherwise provided, buildings and other accessory structures shall be set back a distance of ten feet from the edges of all delineated critical area buffers protecting fish and wildlife habitat conservation and wetland protection areas. The director may reduce the structural setback limit by up to five feet if construction, operation, and maintenance of the building do not create a risk of negative impacts on the adjacent buffer area. Approval of a reduction of the structural setback from the buffer line shall be provided in writing by the director. The following uses may be allowed in the structural setback area:

1. Landscaping;

2. Uncovered decks;

3. Roof eaves and overhangs, maximum of twenty-four inches;

4. Pervious unroofed stairways and steps;

5. Impervious ground surfaces, such as driveways and patios.

Date Passed: Monday, June 19, 2017

Effective Date: Sunday, July 30, 2017

ORD C35508 Section 10

Ash Place Preliminary Long Plat

Application/Permit Number: Z23-587PPLT

Applicant/Agent

Whipple Consulting Engineers, Inc.
21 S. Pines Rd.
Spokane Valley, WA 99206

Owner

Grove Road LLC
1102 N. Monroe St.
Spokane, WA 99201

Location

3242, 3230, and 3224 N. Ash Place; Parcels 25014.4207/.4701/.4702; SE 1/4 S.01, T.25N., R.42E., W.M

Description of Project

The applicant is proposing to subdivide three parcels (a total of 1.32 acres) in the RSF zone (R1 effective 01/01/24) into 20 lots for the purpose of constructing attached housing under the City's Interim Zoning ordinance found in chapter 17C.400 – Interim Housing Regulations Adopted to Implement RCW 36.70A.600(1). The proposal in served by public streets and includes a private driveway access from N. Ash Place for lots fronting N. Ash Street. Private water and sewer utilities will serve proposed lots. SEPA is required and is processed concurrently with the plat application. This is a type III application requiring a hearing before the Hearing Examiner.

Contact Information

Written comments should be sent via mail or email:

Development Services Center
Attn: Melissa Owen
Assistant Planner
808 W. Spokane Falls Blvd.
Spokane, WA 99201-3329
mowen@spokanecity.org
509.625.6063

Appeal 1

2nd Notice of Public Hearing

A public hearing was originally scheduled for March 13, 2025; however, a SEPA appeal resulted in the need for a new hearing date.

The rescheduled hearing on this proposal will be held before the Hearing Examiner on **Wednesday, April 16, 2025, at 9 a.m.** in the City Council Chambers, Lower Level of City Hall, 808 West Spokane Falls Boulevard, Spokane, WA. Any person may submit written comments on the proposal and/or appear at the public hearing.

Only the applicant, persons submitting written comments, and persons testifying at a hearing may appeal the decision of the Hearing Examiner.

- 2nd Notice of Hearing – rescheduled for April 16, 2025 (PDF 276 KB)

SEPA Review

The comment period for this SEPA ended on February 18, 2025. The optional DNS process in WAC 197-11-355 was utilized: There is no further comment period on this SEPA. **Appeal of this DNS must be received within 14 calendar days after the signing of this DNS.** The SEPA DNS is available for review:

- SEPA DNS (PDF 330 KB)

Documents

Application Materials

- General Application (PDF 1.2 MB)
- Preliminary Long Plat Supplemental Application (PDF 330 KB)
- SEPA Checklist (Revised July 2024) (PDF 639 KB)
- SEPA Checklist (PDF 302 KB)
- Critical Areas Checklist (PDF 917 KB)
- Narrative (PDF 864 KB)

Site Planning Documents

- Preliminary Plat Map (Revised Jan. 2025) (PDF 884 KB)
- Preliminary Plat Map (Revised Nov. 2024) (PDF 536 KB)

- Preliminary Plat Map with Pedestrian Connection Shown (revised Nov. 2024) (PDF 1.7 MB)
- Preliminary Plat Map (Revised Oct. 2024) (PDF 945 KB)
- Preliminary Plat Map (Revised July 2024) (PDF 789 KB)
- Preliminary Plat Map (PDF 743 KB)

Technical Documents

- Geotechnical Conditions Report (PDF 7.0 MB)
- Trip Generation and Distribution Letter (PDF 4.4 MB)
- Concept Drainage Report (Revised Nov. 2024) (PDF 2.2 MB)
- Concept Drainage Report (Revised Sept. 2024) (PDF 5.2 MB)
- Concept Drainage Report (PDF 5.2 MB)

Related Documents

- Staff Report (PDF 68.3 MB)
- Notice of Application, SEPA and Hearing with District Notification MAP (PDF 419 KB)
- Technically Complete Letter (Jan. 16, 2025) (PDF 225 KB)
- 4th Request for Comments (PDF 243 KB)
- Request for More information – 4th RFC (PDF 387 KB)
- 3rd Request for Comments (PDF 257 KB)
- Request for More information – 3rd RFC (PDF 240 KB)
- Applicant Response to Request for more information – 3rd RFC (PDF 240 KB)
- 2nd Request for Comments (PDF 268 KB)
- Request for More Information – 2nd RFC (PDF 2.6 MB)
- Applicant Response to Request for More Information – 2nd RFC (PDF 3.7 MB)
- Request for Comments (Original Request) (PDF 267 KB)
- Request for More Information – Initial Review (PDF 1.9 MB)
- Applicant Response to Request for More Information – Initial Review (PDF 936 KB)

Applicable Land Use Standards – Interim Zoning Code 17C.400 (Repealed/Archived)

- 17C.400.010 Pilot Low-Intensity Residential Development Standards (PDF 182 KB)
- 17C.400.020 Pilot Density (PDF 94 KB)
- 17C.400.030 Pilot Low-Intensity Residential Design Standards (PDF 154 KB)

App 4
Depressional - N. Wetland
Vernal Pool - S. Wetland
- Drumheller Creek PSSIC/RUP

Relatively undisturbed is a general term used to describe areas that are almost completely free of human impacts and activities. Relatively undisturbed areas can include uplands, other wetlands, lakes or other bodies of water. It means that the area is free of regular disturbances such as:

- Tilling and cropping
- Residential and urban development
- Grazing
- Paved roads or frequently used gravel roads
- Mowing
- Pets
- Boating and fishing

NOTE 1: Areas dominated by aggressive species are not considered disturbed unless you also have other evidence that disturbances are still present. The aggressive species could be a result of some past disturbance that is no longer present.

NOTE 2: Logged areas that have been undisturbed for at least 5 years can qualify as relatively undisturbed. This includes hybrid poplar plantations that are more than 5 years old.

NOTE 3: Areas that are accessed daily by dogs, either [illegible] people walking them, should be treated as disturbed. Dogs and other pets cause stress among the animals using a wetland.

NOTE 4: A rarely used path or gravel road can be considered relatively undisturbed if it is used less than once or twice a week. Daily usage of a road or [illegible]

NOTE 5: Lakes, ponds, and other bodies of open water can be considered relatively undisturbed if they are not regularly used for boating or for other water-related activities. Daily usage of the lake by boats would be considered disturbed. A lake can be considered undisturbed if it is used only once or twice a week by non-motorized craft.

H 2.1 What is the area of accessible habitat?

Rationale for indicator: It is difficult to separate the effects of habitat loss from the fragmentation of habitat (Fahrig, 2003). Thus, Eigenbrod et al. (2008) have developed an indicator, called "accessible habitat", that integrates these two concepts into one [illegible] the amount of habitat that can be [illegible] land use (e.g., roads, fields, and development). Some lower intensity human land uses such as parks do not completely isolate a habitat. As a result, low and moderate intensity land uses are not completely discounted as accessible habitat. The total area of low and moderate intensity land uses adjacent to the unit is divided by [illegible]
This addresses the issue that some lower intensity land uses do still provide habitat, but not the same level of habitat as undisturbed areas.

ATT 2. Drumheller Springs Park/Conservation Area.

Unless SMC 17E.070.110(3) (Table 17E.070.110-4) applies, width based solely on wetland category as follows:

Chapter 17E.070

Table 17E.070.110-1	
Wetland Category	**Buffer Width**
Type I	250 ft
Type II	200 ft
Type III	150 ft
Type IV	50 ft

2. **Wetland Characteristics Alternative 2.**

Alternative 2 provides three buffer widths based on habitat scores. Habitat score refers to the quality of physical structures such as vegetation, open water, and connections to other wildlife habitats that are necessary for a wide range of species, including birds, mammals, and amphibians. Where more than one width applies based on score for function or based on special characteristics, the calculation providing the widest buffer shall be used. Widths are based on wetland category, intensity of impacts from proposed changes in land use, and wetland functions or special characteristics. Land use intensity shall be determined as follows:

Table 17E.070.110-2. Types of proposed land use that can result in high, moderate, and low levels of impacts to adjacent wetlands.	
Impact from Proposed Change in Land Use	**Types of Land Use Based on Common Zoning Designations**
High	Commercial, Industrial and Institutional Residential (more than 1 unit/acre) High-intensity recreation (golf courses, ball fields, etc.) Conversion to high intensity agricultural (dairies, nurseries, greenhouses, etc.) Hobby Farms
Moderate	Residential (1 unit/acre or less) Moderate-intensity active open space (parks with biking, jogging, etc.) Conversion to moderate intensity agriculture (orchards, hay fields, etc.) Paved trails Building of logging roads Utility corridor with access/maintenance road Forestry (cutting of trees only)
Low	Passive open space (hiking, bird-watching, etc.) Unpaved trails Utility corridor without road or vegetation management

City of Spokane
TABLE 17.E.070.110.3

Table 17 E.070.110-3			
Category of Wetland	**Land Use with Low Impact**	**Land Use with Moderate Impact**	**Land Use with High Impact**
I	125 ft.	190 ft.	250 ft.
II	100 ft.	150 ft.	200 ft.
III	75 ft.	110 ft.	150 ft.
IV	25 ft.	40 ft.	50 ft.

WW-1 + WW-2 PEMIC wetland > 250' Buffer
WW-3 Vernal Pools Area E. Side along Ash Place Rd. 200' Wetland Buffer.

* High Intensity Land Use."

Increased Wetland Buffer Zone Width.

The City may require increased buffer zone widths on a case-by-case basis as determined by the director when a larger buffer is necessary to protect wetland functions and values. This determination shall be supported by appropriate documentation showing that it is reasonably related to protection of the functions and values of the wetland. The documentation must include but not be limited to the following criteria:

S. Tolbert
ECOS USA 6/06/2025.

1. The wetland is used by a plant or animal species listed by the federal government or the state as endangered, threatened, sensitive, or documented priority species or habitats, or essential or outstanding potential habitat for those species, or has unusual nesting or resting sites such as heron rookeries or raptor nesting trees; or

2. The adjacent land is susceptible to severe erosion and erosion control measures will not effectively prevent adverse wetland impacts; or

3. The adjacent land has minimal vegetative cover or slopes greater than thirty percent.

Reduction of Standard Wetland Buffer Zone Width.
The City may reduce the standard wetland buffer zone width on a case-by-case basis as determined by the director, consistent with Wetlands in Washington State, Volume 2, Protecting and Managing Wetlands, Guidance on Buffers and Ratios (Appendix 8-D) as revised, or wetlands that score:

The width of the buffer can be reduced if the following criteria are met:
a. A relatively undisturbed vegetative corridor of at least one hundred feet in width is protected between the wetland and any other priority habitats; and

b. The protected area is preserved by means of easement, covenant, or other measure;

c. Measures identified in SMC 17E.070.110(C)(2) (Table 17E.070.110-5) are taken to minimize the impact of any proposed land use or activity

The buffer width can be reduced to that required for moderate land-use impacts by applying the following measures to minimize the impacts of the proposed land uses or activities:

Table 17E.070.110-5

Disturbance	Examples of Measures used to Minimize Impacts
Light	Direct lights away from wetland
Noise	Locate activity that generates noise away from wetland
Toxic runoff	Route all new untreated runoff away from wetland while ensuring wetland is not dewatered, establish covenants limiting use of pesticides within 150', may apply integrated pest management
Stormwater runoff	Retrofit stormwater detention and treatment for roads and existing adjacent development, prevent channelized flow from lawns that directly enters buffer
Change in water regime	Infiltrate or treat, detain, and disperse into buffer new runoff from impervious surfaces and new lawns
Pets and human disturbance	Use privacy fencing; plant dense vegetation to delineate buffer edge and to discourage disturbance using vegetation appropriate for the ecoregion; place wetland and its buffer in a separate tract
Dust	Use best management practices to control dust

How do we proceed?

Contact the WA Department of Ecology and the City of Spokane regarding Drumheller Springs wetlands rating.

If Drumheller doesn't have a rating, or the rating is more than five years old, we request that the Washington State Department of Ecology and City of Spokane (Planning Department?) require the developer hire a wetland specialist.

The increase of noise and light generated by the developments, and return of migrating water fowl, might be a positive factor against the size of the developments.

Spokane Municipal Codes relating to Wetland Buffer Zone Boundaries

[redacted]

Mon 2/26/2024 9:57 PM

To: [redacted]

Hi [redacted] - The Spokane Municipal Codes and Washington State Department of Ecology rules favor us but I wonder if either entity has actually applied the rules to this project - seems like that would be part of their due diligence. I haven't heard from Zack about the buffer zone review yet - who do you recommend I send it to next? Thank you [redacted]

I have reviewed Spokane Municipal Codes relating to Wetland Buffer Zone Boundaries and these portions apply to developments adjacent to Drumheller Springs:

1. City of Spokane lists Drumheller Springs as an official wetland. https://data-spokane.opendata.arcgis.com/datasets/wetland-1/explore?location=47.686607%2C-117.438505%2C16.93. Drumheller Springs is also recognized by The Washington State Department of Ecology as a wetland.

2. Wetlands are rated according to the Washington State Department of Ecology wetland rating system found in the Washington State Wetlands Rating System for Eastern Washington. Wetlands have four rating levels. The Washington State Department of Ecology Wetlands Rating System establishes the rating criteria https://my.spokanecity.org/smc/?Section=17E.070.100

3. Wetland buffer zones are required for all regulated activities adjacent to wetlands.

4. Buffer zones size is determined by the wetland rating.

5. If Drumheller Springs has a wetland rating that is more than five years old it has expired one must be reviewed by a qualified wetland specialist. The wetland specialist performs wetland delineations using the Federal Manual for Identifying and Delineating Jurisdictional Wetlands and Arid West Final Regional Supplement.

6. If Drumheller Springs does not have a rating it is the responsibility of the development applicant to pay for a wetland field investigation by a qualified professional wetland specialist.

7. The wetland specialist determines the exact location of the wetland boundary; an analysis of wetland functions and values; and a wetland rating according to the wetlands rating system criteria adopted in SMC 17E.070.100.

8. The Washington State Department of Ecology and City of Spokane must verify the accuracy of the wetland specialist's determination.

I have not found a wetland rating for Drumheller Springs. If a rating doesn't exist a wetland delineation is required. There are the four categories of wetlands Type I, II, II, and IV. The four categories are detailed at this link https://my.spokanecity.org/smc/?Section=17E.070.100

Table 17E.070.110-1	
Wetland Category	**Buffer Width**
Type I	250 ft
Type II	200 ft
Type III	150 ft
Type IV	50 ft

Ideally Drumheller Springs would be rated as a Type I Wetland because Type I has the largest Buffer Zone...

Spokane Municipal Code Type I Wetlands include, but are not limited to, the following examples:

Alkali wetlands.
Represent a unique or rare wetland type.
Are more sensitive to disturbance than most wetlands.
Are relatively undisturbed and contain ecological attributes that are impossible to replace within a human lifetime; and

Provide a high level of function.
Wetlands of High Conservation Value (formerly called Natural Heritage Wetlands).
Bogs and Calcareous Fens.
Mature and old-growth forested wetlands over one-fourth acre with slow growing trees.
Wetlands that perform functions at high levels (scores of twenty-two points or more).

In Eastern Washington, Category I Wetlands include Alkali wetlands. Drumheller Springs may qualify as Type I based on several of the criteria including as an alkaline wetland. Alkaline wetlands are restricted to arid lands east of the Cascade Range. They include seasonally or intermittently flooded playas, marshes, and lakes, where alkaline soils and intense evaporation tend to concentrate salts in soils and water. They may support large populations of plants and animals found nowhere else in arid regions, and they are particularly well known as breeding or foraging sites for vast quantities of migrating birds. Many of the same species of plants and animals occur in both interior alkaline wetlands and estuarine wetlands along the coast, and the term "brackish marsh" has been applied to both. Playas or "salt flats" occur in basins with interior drainage that lack any exit streams. During years of high precipitation, runoff and meltwater accumulate in valley bottoms or depressions. Small to large, shallow lakes may form, or existing lakes may expand to flood areas around their edges. Playas are dependent on regional climatic cycles, and their flooding is by definition intermittent and often fleeting. Water may persist into the growing season for a few weeks, a month, or rarely years, and sites may not flood at all for years at a time. Playas are typified by flat topography, highly alkaline or saline soils, and no or scant vegetation that is distinctive and adapted to saline or alkaline conditions. Animals are adapted to the intermittent hydrology and may emerge only every few years.

If a Type I wetland is classified with at least one of the following special characteristics the following buffer table shall apply:

Table 17E.070.110-4		
Wetland Characteristics	**Buffer Widths by Impact of Proposed Land Use (apply most protective if more than one criterion is met)**	**Other Measures Recommended for Protection**
Wetlands of High Conservation Value	Low - 125 ft Moderate – 190 ft High – 250 ft	No additional surface discharges to wetland or its tributaries No septic systems within 300 ft Restore degraded parts of buffer
Bogs	Low - 125 ft Moderate – 190 ft High – 250 ft	No additional surface discharges to wetland or its tributaries Restore degraded parts of buffer
Forested	Buffer size to be based on score for habitat functions or water quality functions	If forested wetland scores high for habitat, need to maintain connectivity to other natural areas Restore degraded parts of buffer
Alkali	Low – 100 ft Moderate – 150 ft High – 200 ft	No additional surface discharges to wetland or its tributaries Restore degraded parts of buffer
High level of function for habitat (score for habitat 8 - 9 points)	Low – 100 ft Moderate – 150 ft High – 200 ft	Maintain connections to other habitat areas Restore degraded parts of buffer
Moderate level of function for habitat (score for habitat 5 - 7 points)	Low – 75 ft Moderate – 110 ft High – 150 ft	No recommendations at this time
High level of function for water quality improvement (8 - 9 points) and low for habitat (less than 5 points)	Low – 50 ft Moderate – 75 ft High – 100 ft	No additional surface discharges of untreated runoff
Not meeting any of the above characteristics	Low – 50 ft Moderate – 75 ft High – 100 ft	No recommendations at this time

The complete Spokane Municipal Code Wetlands Rating System by Category Types I, II, III and IV is at https://my.spokanecity.org/smc/?Section=17E.070.100

These are excerpts from the Spokane Municipal Code which apply to wetlands and their buffer zones.

Title 17E Environmental Standards; Chapter 17E.070 Wetlands Protection; Section 17E.070.030 Identification, Designation, and Mapping of Wetlands...

B. Determination of Wetland Boundary.

1. The applicant shall, through the performance of a field investigation by a qualified professional wetland scientist applying the wetland definition provided in this chapter and in SMC 17A.020.230 and as part of the wetlands report requirement found in this chapter provide a site analysis including: a determination of the exact location of the wetland boundary; an analysis of wetland functions and values; and a wetland rating according to the wetlands rating system criteria adopted in SMC 17E.070.100. Qualified wetland scientists shall perform wetland delineations using the Federal Manual for Identifying and Delineating Jurisdictional Wetlands (1987), Arid West Final Regional Supplement (2008), as revised or supplemented. The Director, upon consultation with the Department of Ecology, may determine that wetland identification and delineations made prior to adoption of these standards, or for a different use requiring permit changes, require a new determination by a qualified wetland scientist. Wetland determinations are subject to Corps Regulatory Guidance Letter (RGL) 05-02, 2005 and expire after five years from the date of determination and must follow requirements for review by a qualified wetland scientist upon expiration of the five year limitation.

2. **Where an applicant has provided a delineation of a wetland boundary, the department shall verify the accuracy of, and may render adjustments to, the boundary delineation.** The applicant may be charged by the department for costs incurred in verifying the accuracy of the delineation. In the event the adjusted boundary delineation is contested by the applicant, the department may, at the applicant's expense, obtain the services of a second wetlands scientist to perform a delineation. The second delineation shall be final, unless appealed to the hearing examiner.

Section 17E.070.110 **Wetland Buffers**

A. **Wetland buffer zones shall be required for all regulated activities adjacent to wetlands.**

All buffers shall be measured from the wetland boundary as surveyed in the field pursuant to the requirements of SMC 17E.070.030. The width of the wetland buffer zone shall be determined according to the rating assigned to the wetland in accordance with SMC 17E.070.100 and consistent with Wetlands in Washington State, Volume 2, Protecting and Managing Wetlands, Guidance on Buffers and Ratios (Appendix 8-D) as revised, for wetland category, intensity of impacts, wetland functions, habitat scores, or special characteristics. Standard buffer widths will be determined based on an evaluation of the following:

1. conditions of the wetland;
2. conditions of the buffer;
3. proposed land uses adjacent to the buffer; and
4. the functions intended to be protected

B. **Wildlife habitat function is the most susceptible to developmental change and requires the greatest buffer protection.** Protection of wildlife habitat functions require twenty five to seventy five feet for wetlands with minimal habitat functions and low intensity land uses adjacent to the wetlands, fifty to two hundred feet for wetlands with moderate habitat function and moderate or high intensity land use adjacent to the wetlands, and one hundred fifty to two hundred fifty plus feet for wetlands with high habitat functions depending on the intensity of the adjacent land use.

There are two alternative methods to determining the width of the wetland buffer zone. Alternative one is based on the wetland already having a wetland rating.

Wetland Characteristics Alternative 1.

ATT 4 -

part of the combine Notice of Application, Notice of SEPA Application, and Public Hearing. No appeal of the DNS was received as of the date of this report. The appeal deadline for this DNS is March 7, 2025, at 5 pm.

If the owner proposes development that exceeds that described in the proposal the development will be required to complete SEPA specific to that development.

Staff Discussion:
Residents nearby the subject site submitted comment specific to the historic context of Drumheller Springs Conservation Area, the wetlands located in Drumheller Springs Park, Wildlife, protection of the basalt bluff and geotechnical-related concerns. While historic resources were addressed in Criteria 4 above, the following discussion items are related environmental-specific code compliance.

✓ **Wetlands.**
The City's wetland codes are intended to provide necessary protection for wetland resources. While the Folsom-Quinn Wetland study conducted many years ago indicated a wetland in the Drumheller Springs Park, more current maps including that of the National Wetland Inventory map National Wetlands Inventory available for public view do not indicate a managed wetland in this location. The SMC also recognizes that not all wetlands are mapped.

✓ The wetland identified in the Folsom-Quinn Wetland Study identified the wetlands as a seasonally ponded area. Under currently adopted code, this type of wetland would be Date categorized as either a category II or III wetland with a protective buffer ranging from 100-200' (See Section 17E.070.100 Wetlands Rating System and Table 17E.070.110-1 found in Section 17E.070.110 Wetland Buffers). In this case the site proposed for development is over 200' from the wetland identified in the Folsom-Quinn Wetland Study. Additionally, due to concern about standing water on the subject site the applicant engaged Larry Dawes of Biology Soil & Water, listed on the County's list of qualified wetland wetlands specialist listing (BP-80) found at BP-80 12-7-15 rev 3.indd (see Mr. Dawes response via email found in exhibit 9.c.iii. – Applicant Response to RFC no. 2). Based on a wetland reconnaissance of the site, no wetland characteristics were observed on the subject site. Based on Mr. Dawes' expertise and the information in the geotechnical report, staff determined that there was no need for additional evaluation of any on-site water wetlands associated with the project site. Additionally, no further evaluation of the wetland associated with Drumheller Springs Park was require due to the context of the site which includes an intervening developed public street between the wetland and the project site in addition to the wetland type (category II or III) and associated buffer which does not reach the project site.

Several staff from ecology including those who specifically address wetland protection were included in the agency review distribution. No comments were received from agencies with jurisdiction requesting additional evaluation or mitigation in association with the wetland located in Drumheller Springs Park.

Wildlife.
While the City's GIS mapping does not include any priority habitat and species in the project location, WA Dept. of Fish and Wildlife (WDFW) Priority Habitat and Species (PHS) Maps show that the subject site is included in a priority area for Big Eared Bats. Staff from Washington Department of Fish and Wildlife confirmed that the site would be unlikely to provide habitat for

✓ S. Gelbe
ECOS USA
5/28/2025