

ATT 4

BIOLOGY SOIL & WATER, INC.

3102 N Girard Rd, Spokane Valley WA 99212

Todd Whipple
Whipple Consulting Engineers
21 South Pines Road
Spokane Valley, WA 99206

RE: Ash Place Wetland Issues

Greetings Todd Whipple:

In September 2024, Biology Soil and Water, Inc. (BSW) was retained by Whipple Consulting Engineers to complete a wetland reconnaissance at the site located at 3242 N. Ash. The undersigned, Larry Dawes, was asked to investigate tax parcel #'s 25014.4207, 25014.4701, and 25014.4702. No wetlands were identified on those parcels. The investigation included adjacent properties that might have streams or wetlands with buffers that could encumber the subject property. The investigation of surrounding areas included wetlands on City of Spokane property on the opposite side of N. Ash Place from the proposed development.

The BSW investigation included the wetland in closest proximity to the three parcels proposed for development. A quick assessment of the wetland rating form for that wetland indicated the wetland was probably a Category 3 with a 150-foot buffer based on the function score. The wetland Category was probably a Category 2 with a 200-foot buffer based Special Characteristics (forested canopy with slow growing trees). The Section, Township, Range for the site was listed on the National Heritage list. Any wetland on that list is automatically assigned a 250-foot buffer. The undersigned did not check to see if the subject wetland was on the list, but assumed it was and applied the 250-foot buffer to see if it encumbered the subject property. The undersigned used a laser rangefinder to determine that the southwest corner of parcel # 25014.4072, the closest point of the proposed development, was not encumbered by the 250-foot buffer of the wetland. At its closest point, the wetland is about 270 feet from the proposed development.

On March 10, 2025 BSW was asked to respond to a comment on the proposed development that stated the southwest corner of parcel # 25014.4072 was encumbered by the 250-foot buffer of a wetland. The undersigned confirmed that distance with the laser rangefinder on 11 March 2025 when wetland hydrology could be directly observed to determine the wetland edge. At its closest point to the wetland, the subject parcel is about 20 feet outside of the 250-foot buffer.

Out of the window to properly observe + identify Vernal wetlands. Midway

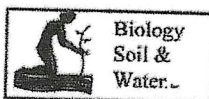
- June 1, 2025
is the only "window"

investigation was done at the wrong time

"window" to capture & identify wetland plants & hydrology.

phone (509)-327-2684

email bswinc@icehouse.net



J SGLS

ECOS USA 6/9/2025.

The suggestion that the subject parcel is partly encumbered by wetland buffer appears to have been based on a wetland and associated buffer depicted on the Spokane County interactive Map Viewer since a copy of that Map Viewer page was attached to the comment and appeal of the DNS. This mapping system is for general planning purposes only and typically does not offer an accurate depiction of a surveyed wetland boundary or buffer. BSW relied on a laser rangefinder to accurately measure the distance in the field.

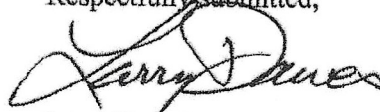
The subject wetland is in the southeast corner Drumheller Springs Park. The wetland occurs in a patch of trees located on the west side of N. Ash Place and the north side of W Euclid Ave. A trail extends from N. Ash Place, along the north side of the subject wetland, closely borders another wetland located slightly to the northwest, continues through the center of Drumheller Springs Park, and connects to N. Belt-Oak Alley on the west side of the park.

Not typically used.

The interactive Map Viewer assigns a 250-foot buffer to both wetlands in the east part of the park. The trail runs immediately adjacent to the edge of both wetlands and receives daily foot traffic from neighbors enjoying nature with their pets. The park is a valuable resource, and I enjoyed walking the trail myself. However, the buffers are not treated as a Category 1 National Heritage Wetland buffers due to the extent of human activity in the park. Part of the 250-foot buffers is even used for parking.

The entire southern edged of the wetland in the SW corner of the park averages about 100 feet from W. Euclid Avenue. Work on utilities on the north side of W. Euclid Avenue has disturbed a 10-15 foot wide swath of wetland buffer along the entire wetland edge. As of this date, the disturbed Category 1 Wetland buffer does not appear to have been hydroseeded with native grasses and mulch to restore the impact area. The subject area may occur within the right-of-way, and may occur in a park, but it should be restored. If evidence is produced that the proposed development somehow encroaches on a few square feet of this Category 1 Wetland buffer, then perhaps the mitigation can be reseeded the disturbed buffer along W. Euclid Avenue with native grasses.

Respectfully submitted,



Larry Dawes
Biology Soil & Water, Inc.
3102 N. Girard Road
Spokane Valley, WA 99212
Phone: 509-327-2684
Email: bswinc@icehouse.net

Notes:

1. No Soil Pits where dig to determine wetland boundary.
2. There are 3 wetland units including the outer "Vernal Pools Area" Please see "Wetlands Boundaries Buffers Map" attachments 3.

V.S. Galt
6/09/2025

NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY - NOMINATION FORM

(Type all entries - complete applicable sections)

APPELLANT
EXHIBIT 1

1. NAME				
COMMON: Drumheller Springs				
AND/OR HISTORIC: "Lone Pine" or ("Spring Hill") or ("Garry's Springs")				
2. LOCATION				
STREET AND NUMBER: Euclid Avenue and Maple Street				
CITY OR TOWN: Spokane				
STATE: Washington		CODE: 53	COUNTY: Spokane	CODE: 063
3. CLASSIFICATION				
CATEGORY (Check One)		OWNERSHIP		ACCESSIBLE TO THE PUBLIC
<input type="checkbox"/> District <input type="checkbox"/> Building <input checked="" type="checkbox"/> Site <input type="checkbox"/> Structure <input type="checkbox"/> Object		<input checked="" type="checkbox"/> Public <input type="checkbox"/> Private <input checked="" type="checkbox"/> Both		STATUS <input checked="" type="checkbox"/> Occupied <input type="checkbox"/> Unoccupied <input checked="" type="checkbox"/> Preservation work in progress
PRESENT USE (Check One or More as Appropriate)		PUBLIC ACQUISITION: <input checked="" type="checkbox"/> In Process <input type="checkbox"/> Being Considered		
<input type="checkbox"/> Agricultural <input type="checkbox"/> Government <input type="checkbox"/> Commercial <input type="checkbox"/> Industrial <input type="checkbox"/> Educational <input type="checkbox"/> Military <input type="checkbox"/> Entertainment <input type="checkbox"/> Museum		<input checked="" type="checkbox"/> Park <input checked="" type="checkbox"/> Private Residence <input type="checkbox"/> Religious <input type="checkbox"/> Scientific		
		<input type="checkbox"/> Transportation <input type="checkbox"/> Comments <input type="checkbox"/> Other (Specify) _____		
4. OWNER OF PROPERTY				
OWNER'S NAME: Spokane Park Department				
STREET AND NUMBER: Spokane City Hall, North 221 Wall Street				
CITY OR TOWN: Spokane		STATE: Washington CODE: 53 46		
5. LOCATION OF LEGAL DESCRIPTION				
COURTHOUSE, REGISTRY OF DEEDS, ETC.: Spokane County Court House				
STREET AND NUMBER: W. 1116 Broadway				
CITY OR TOWN: Spokane		STATE: Washington CODE: 53 46		
6. REPRESENTATION IN EXISTING SURVEYS				
TITLE OF SURVEY: Spokane Metropolitan Area Transportation Study				
DATE OF SURVEY: 1968 <input checked="" type="checkbox"/> Federal <input checked="" type="checkbox"/> State <input checked="" type="checkbox"/> County <input checked="" type="checkbox"/> Local				
DEPOSITORY FOR SURVEY RECORDS: Spokane City Hall				
STREET AND NUMBER: North 221 Eall Street				
CITY OR TOWN: Spokane		STATE: Washington CODE: 53 46		

SEE INSTRUCTIONS

STATE: Washington
COUNTY: Spokane
FOR NPS USE ONLY
ENTRY NUMBER
DATE

7. DESCRIPTION

CONDITION	(Check One)					
	<input type="checkbox"/> Excellent	<input type="checkbox"/> Good	<input checked="" type="checkbox"/> Fair	<input checked="" type="checkbox"/> Deteriorated	<input type="checkbox"/> Ruins	<input type="checkbox"/> Unexposed
	(Check One)			(Check One)		
	<input type="checkbox"/> Altered	<input checked="" type="checkbox"/> Unaltered	<input type="checkbox"/> Moved	<input checked="" type="checkbox"/> Original Site		

DESCRIBE THE PRESENT AND ORIGINAL (If known) PHYSICAL APPEARANCE

Drumheller Springs Indian Historical site is a marshey area on a wooded hillside. The 'springs area' is fenced and an explanatory sign has been erected at the springs. The original site of the Springs probably did not have as many trees as now due to Indian encampments which utilized the wood for fuel. The Spokane City Park Department has expanded the area to 13 acres in total and are planning to develop visitor facilities on the Hill above the spring site.

SEE INSTRUCTIONS

SEE INSTRUCTIONS

8. SIGNIFICANCE

PERIOD (Check One or More as Appropriate)

- | | | | |
|--|---------------------------------------|--|---------------------------------------|
| <input type="checkbox"/> Pre-Columbian | <input type="checkbox"/> 16th Century | <input type="checkbox"/> 18th Century | <input type="checkbox"/> 20th Century |
| <input type="checkbox"/> 15th Century | <input type="checkbox"/> 17th Century | <input checked="" type="checkbox"/> 19th Century | |

SPECIFIC DATE(S) (If Applicable and Known)

AREAS OF SIGNIFICANCE (Check One or More as Appropriate)

- | | | | |
|---|--------------------------------------|---|--|
| <input type="checkbox"/> Aboriginal | <input type="checkbox"/> Education | <input type="checkbox"/> Political | <input type="checkbox"/> Urban Planning |
| <input checked="" type="checkbox"/> Prehistoric | <input type="checkbox"/> Engineering | <input type="checkbox"/> Religion/Phi- | <input type="checkbox"/> Other (Specify) |
| <input checked="" type="checkbox"/> Historic | <input type="checkbox"/> Industry | losophy | |
| <input type="checkbox"/> Agriculture | <input type="checkbox"/> Invention | <input type="checkbox"/> Science | |
| <input type="checkbox"/> Architecture | <input type="checkbox"/> Landscape | <input type="checkbox"/> Sculpture | |
| <input type="checkbox"/> Art | Architecture | <input type="checkbox"/> Social/Human- | |
| <input type="checkbox"/> Commerce | <input type="checkbox"/> Literature | itarian | |
| <input type="checkbox"/> Communications | <input type="checkbox"/> Military | <input type="checkbox"/> Theater | |
| <input type="checkbox"/> Conservation | <input type="checkbox"/> Music | <input type="checkbox"/> Transportation | |

STATEMENT OF SIGNIFICANCE

Drumheller Springs was the site of both prehistoric and historic Indian encampments. The Water and reeds which grew in the area drew the Indians to this sheltered campsite. During historic times this site was the point at which Chief Spokane Garry built his reed-mat church and attempted to convert his Spokane tribesman to the Christian faith before any white missionaries reached the area.

MAJOR BIBLIOGRAPHICAL REFERENCES

Spokane Story by Lucile Fargo, published by the Northwestern Press, Minneapolis Minnesota, 1957.

History, Government and Resources of the Spokane Area by Edmund T. Becher, published by Spokane Public Schools, Spokane, Washington 1965.

10. GEOGRAPHICAL DATA

LATITUDE AND LONGITUDE COORDINATES DEFINING A RECTANGLE LOCATING THE PROPERTY				LATITUDE AND LONGITUDE COORDINATES DEFINING THE CENTER POINT OF A PROPERTY OF LESS THAN TEN ACRES			
CORNER	LATITUDE			LONGITUDE			
	Degrees	Minutes	Seconds	Degrees	Minutes	Seconds	
NW	0	0	0	47	41	20	
NE	0	0	0				
SE	0	0	0				
SW	0	0	0				

APPROXIMATE ACREAGE OF NOMINATED PROPERTY: One acre centered on the monument within 13 acre pa

LIST ALL STATES AND COUNTIES FOR PROPERTIES OVERLAPPING STATE OR COUNTY BOUNDARIES		CODE
STATE:	COUNTY:	CODE
STATE:	COUNTY:	CODE
STATE:	COUNTY:	CODE
STATE:	COUNTY:	CODE

11. FORM PREPARED BY

NAME AND TITLE: William H. Trogdon		DATE April 15, 1970
ORGANIZATION Eastern Washington State Historical Society		
STREET AND NUMBER: West 2310 First Avenue		
CITY OR TOWN: Spokane	STATE Washington	CODE 53 46

12. STATE LIAISON OFFICER CERTIFICATION

As the designated State Liaison Officer for the National Historic Preservation Act of 1966 (Public Law 89-665), I hereby nominate this property for inclusion in the National Register and certify that it has been evaluated according to the criteria and procedures set forth by the National Park Service. The recommended level of significance of this nomination is:

National ☐ State ☐ Local ☐

Name Charles H. Odegaard

Title Director
Washington State Parks and Recreation Commission

Date _____

I hereby certify that this property is included in the National Register.

Chief, Office of Archeology and Historic Preservation

Date _____

ATTEST:

Keeper of The National Register

Date _____

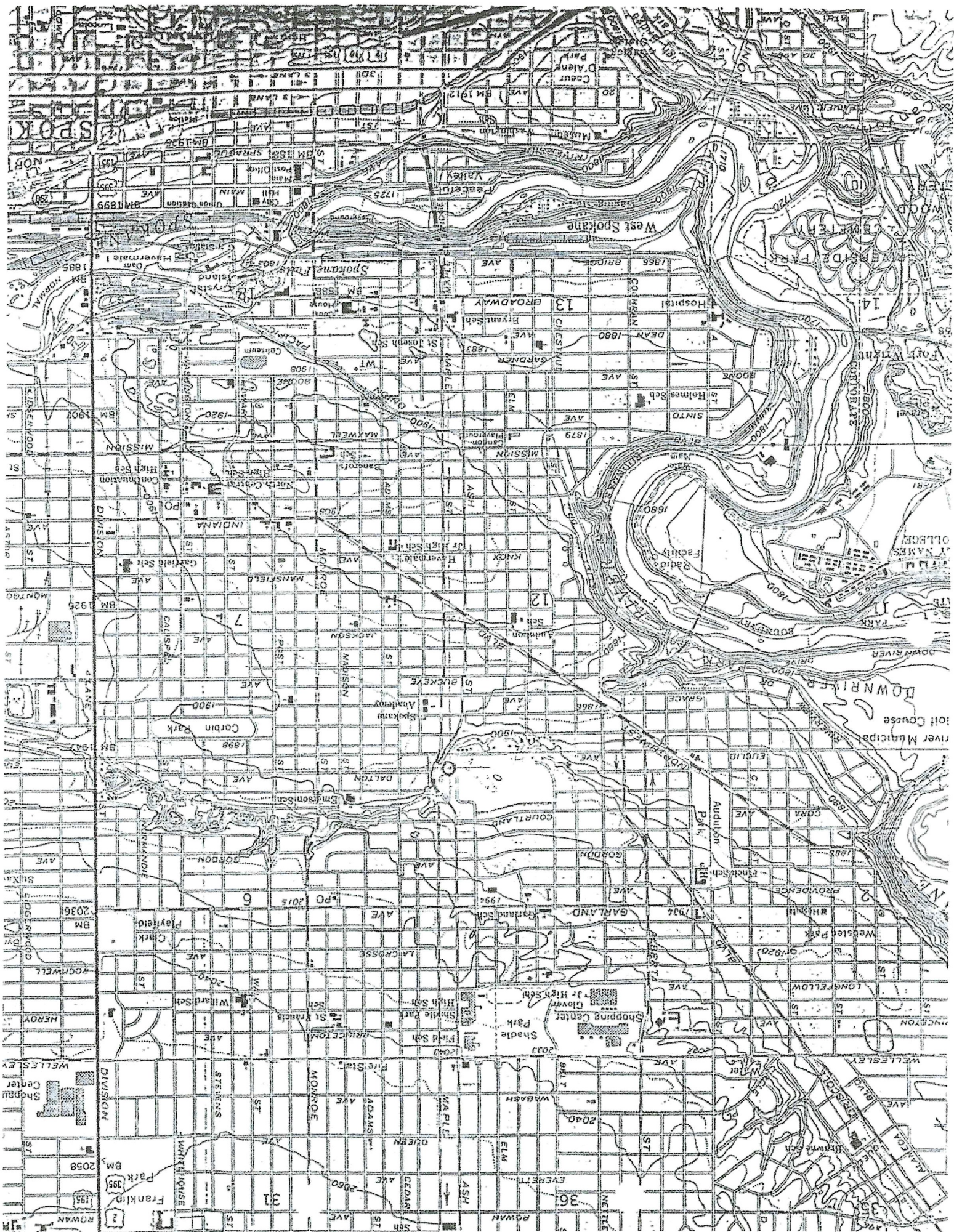
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SEE INSTRUCTIONS

Form 10-301
(July 1969)UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICENATIONAL REGISTER OF HISTORIC PLACES
PROPERTY MAP FORM

(Type all entries - attach to or enclose with map)

1. NAME		STATE	
COMMON: Drumheller Springs		Washington	
AND/OR HISTORIC: "Tone Pine" or "Spring Hill" or "Garry's Springs"		COUNTY	
2. LOCATION		Spokane	
STREET AND NUMBER:		FOR NPS USE ONLY	
Euclid Avenue and Maple Street		ENTRY NUMBER	
CITY OR TOWN:		DATE	
Spokane			
STATE:		CODE	COUNTY:
Washington		4853	Spokane
3. MAP REFERENCE		CODE	
SOURCE: Chevron (Standard Oil Co.) Road Map		063	
SCALE: 1" = 0.64 miles			
DATE: 1969			
4. REQUIREMENTS			
TO BE INCLUDED ON ALL MAPS			
1. Property boundaries where required.			
2. North arrow.			
3. Latitude and longitude reference. USGS 1"=2000' 1:24000 Lat. 47° 41' 20" Long. 117° 26' 3"			



This site has been a landmark in the Spokane area for decades. It was important to the aborigines because it was nearly the only available water on the North Hill; that is, the plateau extending for some four or five miles from the Spokane River to the foothills. It was particularly useful to the Indians because it lay beside a natural route or trail leading from the upper Spokane River to the Spokane House, Little Falls, and other down river areas. Countless Indian gatherings have been held there throughout the centuries. A branch of the Spokane Indian tribe made it its winter headquarters; and there are, consequently, numerous Indian burials in the immediate surroundings. Originally, the Indians gave it a name which is difficult to translate into English because it involved one of their complicated legends. Some early settlers referred to it as "Lone Pine"; and it is known by that name to many early settlers and their descendants. Other people referred to it as "Spring Hill." Still others have called it "Garry's Spring." More recently, however, it usually has been called "Drumheller Springs" for reasons hereinafter described.

The spring site is closely associated with the life and career of the first white trained school teacher and Christian missionary in the states of Washington and Oregon. Spokane Garry, when a lad of 14 years, was taken to the fur traders school at the foot of Lake Winnepeg in the year of 1825. After spending some five or six years there learning the French and English languages and the fundamentals of agriculture and the Episcopalian faith, he returned to his homeland with the resolution to teach his tribe the ways of the white man. In this he was successful for a while, but he was constrained to abandon his efforts after two or three years because of the difficulty of persuading the leaders of the tribe to adopt such things as monogamy and to induce them to exchange the use of the bow and arrow for the plow and hoe. There is some controversy as to where his first school house stood. Pioneers assumed that it stood here at Lone Pine Springs as early as 1830. This impression was gained from an interview made with Spokane Garry's daughter, Nellie, by William S. Lewis, a noted historian of the Eastern Washington State Historical Society. Nellie informed Mr. Lewis that her father's school was located at this spring. There are those, however, who affirm that Nellie was in error in that she remembered a school which was held at this spot by Garry considerably late in life; that is, in the 60's. Knowledgeable members of the Spokane Indian tribe are in agreement, moreover, that Garry's first school, established in 1830, was located across the main Spokane River from Spokane House. But in either case, this spring was the site of educational activity on the part of Spokane Garry, the first teacher in the state, at some time in his life and, as a consequence, is deserving of preservation as an educational shrine. Even if his first formal school was near Spokane House, it is reasonably certain that he made extensive and repeated reports to groups of Indians assembled in the long house which was maintained constantly at Drumheller Springs. After his return from Winnepeg he was famous among the Indians of the Northwest. He was entertained and extensively questioned by all Spokane chiefs.

The spring site was visited and utilized by many of the very earliest white visitors to the area; fur traders, missionaries, soldiers, miners, and stock men. In 1879, it became known that the Northern Pacific Railway intended to build its transcontinental line through the little village of Spokane Falls, which at that time numbered less than 300. This information caused the population of the village to expand tremendously; and, as a result, the very colorful early pioneer stock man, "Uncle Dan" Drumheller, decided to erect a slaughter house in the village and to use it as an outlet for the market for his numerous cattle which he had been raising in the Big Bend or Crab Creek areas. He needed a large quantity of clear, cold water for his operation, and, for that reason, erected his slaughter house on the flat immediately below the spring. At that time there were several more (since dried up) springs close to the one which still flows. All of these springs were collected into a single supply. This activity, instead of discouraging its use for habitation by the Indians, actually enhanced its value to them, because in those days so many parts of the animals that were slaughtered were of little use to the white man (hearts, livers, kidneys, and the like). Mr. Drumheller gave these to the Indians. Some members of the Spokane Indian tribe vividly remember that the notorious "Curly Jim", an Indian who later became famous because of his habit of sitting at

the entrance of a downtown Spokane bank, very early ingratiating himself with Mr. Drumheller and acquired the privilege of distributing this material, somewhat to the disgust and discomfiture of the other Spokanese.

When the Northwestern part of the city began to be settled, many of these early inhabitants used the Drumheller Springs as the only source of drinking water; there being, of course, no city water available for many years. Many living Spokanites (1966) recall taking buckets and other containers to the spring to "fetch" water in them for their mothers. It was in those days a favorite picnic and camping spot for all classes of people.

The hillside from which the spring flows (approximately 200 x 200 ft.) remained in its natural state until the late 1930's. At that time a family bought the lot and spring being especially anxious to secure drinking water which was unchlorinated. The family built a house on the lot, which was removed when the Historical Society bought the property in 1968.

Property was transferred by E.W.S.H.S to the city parks who have built up and expanded the site. See description of present designation for area and ownership etc.