Environmental Assessment
for HUD-funded Proposals
Recommended format per 24 CFR 58.36, revised February 2004
[Previously recommended EA formats are obsolete].

Project Identification: Sinto Commons

Preparer: Paul Trautman, Program Manager

Responsible Entity: City of Spokane, Washington

Month/Year: March 2020
Environmental Assessment

Responsible Entity: City of Spokane

Certifying Officer: Tim Sigler, Director
Project Name: Sinto Commons
Project Location: 441-509 W Sinto, Spokane
Estimated total project cost: $13,000,000

Grant Recipient: Community Frameworks
Recipient Address: 907 W Riverside, Spokane, WA 99201
Project Representative: Mary May, Senior Housing Developer
Telephone Number: 509-484-6733

Conditions for Approval: [24 CFR 58.40(d), 40 CFR 1505.2(c)]
None

FINDING: [58.40(g)]

X Finding of No Significant Impact
(The project will not result in a significant impact on the quality of the human environment)

Finding of Significant Impact
(The project may significantly affect the quality of the human environment)

Preparer Signature: Paul Trautman, Program Manager, City of Spokane CHHS Dept.
Date: 6/9/2020

Reviewer Signature: George Dahl, Program Manager, City of Spokane CHHS Dept.
Date: 6/10/2020

RE Approving Official Signature: Tim Sigler, Director, City of Spokane CHHS Dept.
Date: 6/11/2020

HUD Seattle Region Environmental Office --
May 2005
Statement of Purpose and Need for the Proposal: [40 CFR 1508.9(b)]

There is a need to increase the supply of quality affordable housing serving very low-income and extremely low-income households in the City of Spokane. There is also a need to assign rent assistance making certain housing units affordable to those lacking income to pay rent in affordable housing units. Both needs are currently unmet in the City of Spokane. This proposed project supplies new affordable housing units and federal project-based rental vouchers to increase rent affordability for renter households.

Description of the Proposal: Include all contemplated actions which logically are either geographically or functionally a composite part of the project, regardless of the source of funding. [24 CFR 58.32, 40 CFR 1508.25]

Acquisition, construction, operating, and rent assistance funding for development of approximately 47 rental housing units utilizing public funds. Estimated federal funding includes $780,000 City of Spokane HOME (M-19-MC-53-0201), $3,000,000 State of Washington National Housing Trust Fund (F 19-SG-53-0100), and $1,136,000 Spokane Housing Authority Project-Based Rent Assistance (2021-75-HA). The project includes full site development including activities such as ground disturbance, new housing construction, utility connections, and related offsite improvements.

Existing Conditions and Trends: Describe the existing conditions of the project area and its surroundings, and trends likely to continue in the absence of the project. [24 CFR 58.40(a)]

The project site is a mix of 5 developed and undeveloped parcels and a to-be-vacated alley, as follows. 519 W Sinto: vacant, undeveloped land. 511 W Sinto: vacant, undeveloped land. 509 W Sinto previously a single-family residence that was demolished August 2019 (prior to any application for federal funding) and now vacant, undeveloped land. Parcel 35181.3201 (no site address): vacant, undeveloped land. 441 W Sinto: a single-family residence scheduled for demolition. The alley easement south of the project site is scheduled for vacated and added to the project site.

Existing site surroundings are compatible and include residential, educational, and commercial uses. This site is zoned CB-150 allows this planned multifamily housing development. Project site is in an established mixed-use neighborhood. A December 2018 Phase 1 Environmental Site Assessment found no recognized environmental condition. Existing conditions show little evidence of nearby property redevelopment except for 2020 City Sportsplex, 2019 North Central High School improvements, and the 2015 West 315 (NEPA reviewed for its proximity to this project) and 2011 Centerstone affordable housing developments. Future trends are likely to include added high-density residential and commercial redevelopment given desirable zoning and location.

Statutory Checklist
[24 CFR §58.5]

Record the determinations made regarding each listed statute, executive order or regulation. Provide appropriate source documentation. [Note reviews or consultations completed as well as any applicable permits or approvals obtained or required. Note dates of contact or page references]. Provide compliance or consistency documentation. Attach additional material as appropriate. Note conditions, attenuation or mitigation measures required.

<table>
<thead>
<tr>
<th>Factors</th>
<th>Determination and Compliance Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Historic Preservation [36 CFR 800]</td>
<td>9/23/2019 SHPO determined that the existing house at 441 W Sinto is &quot;Not Eligible&quot; and the house demolished prior to federal funds application at 509 W Sinto is &quot;Not Eligible&quot;. 2/25/2020 SHPO archeological consultation determined Area</td>
</tr>
</tbody>
</table>

3 of 7
May 2005

HUD Seattle Region Environmental Office --
<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Floodplain Management [24 CFR 55, Executive Order 11988]</td>
<td>Project site is not located in a FEMA-designated floodway or flood plain per FEMA map panel 53063C0541D, 7/5/2010.</td>
</tr>
<tr>
<td>Wetlands Protection [Executive Order 11990]</td>
<td>There are no wetlands mapped or observed onsite.</td>
</tr>
<tr>
<td>Coastal Zone Management Act [Sections 307(c),(d)]</td>
<td>There is no coastal zone in Spokane County.</td>
</tr>
<tr>
<td>Sole Source Aquifers [40 CFR 149]</td>
<td>Project is not located on the Spokane-Rathdrum aquifer but is within the aquifer recharge area. This project is served by municipal water, sewer, and storm water services.</td>
</tr>
<tr>
<td>Endangered Species Act [50 CFR 402]</td>
<td>Project site was previously developed lacking trees and riparian zone. Project is not located near salmonid bearing stream/habitat. Project will not effect endangered species or habitat.</td>
</tr>
<tr>
<td>Wild and Scenic Rivers Act [Sections 7(b), (c)]</td>
<td>There are no Wild and Scenic Rivers in Spokane County.</td>
</tr>
<tr>
<td>Air Quality [Clean Air Act, Sections 176 (c) and (d), and 40 CFR 6, 51, 93]</td>
<td>Spokane County is an attainment area. Project does not trigger conformity with the Clean Air Act.</td>
</tr>
<tr>
<td>Farmland Protection Policy Act [7 CFR 658]</td>
<td>Project site is currently zoned Community Business and is located in an established neighborhood. Project does not trigger the Farmland Protection Policy Act.</td>
</tr>
<tr>
<td>Environmental Justice [Executive Order 12998]</td>
<td>Project neither causes nor is subject to adverse environmental impact. It is determined that this project does not disproportionately impact low-income residents and does not impose an Environmental Justice concern.</td>
</tr>
<tr>
<td>HUD Environmental Standards</td>
<td>Noise Abatement and Control [24 CFR 51 B]</td>
</tr>
<tr>
<td>Toxic/Hazardous/Radioactive Materials, Contamination, Chemicals or Gases [24 CFR 58.5[(1)(2))]</td>
<td>No NPL/CERCLA site is located near the project. Review of NEPAssist mapped sites, aerial photo, and Phase 1 ESA (as reference only) did not identify historic or current toxic or radioactive hazard. No evidence of underground storage tank. No evidence of onsite radon hazard. No contamination was identified that would affect occupant health or safety.</td>
</tr>
<tr>
<td>Siting of HUD-Assisted Projects near Hazardous Operations [24 CFR 51 C]</td>
<td>No flammable/explosive tank was mapped or observed within 1 mile of project.</td>
</tr>
<tr>
<td>Airport Clear Zones and Accident Potential Zones [24 CFR 51 D]</td>
<td>Project is not located within a Clear Zone or Accident Potential Zone. This regulation does not apply.</td>
</tr>
</tbody>
</table>
Environmental Assessment Checklist

[Environmental Review Guide HUD CPD 782, 24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27]

Evaluate the significance of the effects of the proposal on the character, features and resources of the project area. Enter relevant base data and verifiable source documentation to support the finding. Then enter the appropriate impact code from the following list to make a determination of impact. **Impact Codes:** (1) - No impact anticipated; (2) - Potentially beneficial; (3) - Potentially adverse; (4) - Requires mitigation; (5) - Requires project modification. Note names, dates of contact, telephone numbers and page references. Attach additional material as appropriate. Note conditions or mitigation measures required.

<table>
<thead>
<tr>
<th>Land Development</th>
<th>Code</th>
<th>Source or Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conformance with Comprehensive Plans and Zoning</td>
<td>1</td>
<td>The Comprehensive Plan supports increasing the supply of affordable housing. Project is allowed under current Community Business zoning.</td>
</tr>
<tr>
<td>Compatibility and Urban Impact</td>
<td>1</td>
<td>Project site is a built urban environment. Project is compatible and consistent with zoning and surrounding uses.</td>
</tr>
<tr>
<td>Slope</td>
<td>1</td>
<td>Project site has low slope to be incorporated into building design.</td>
</tr>
<tr>
<td>Erosion</td>
<td>1</td>
<td>No evidence of erosion. Project to comply with City storm water requirements.</td>
</tr>
<tr>
<td>Soil Suitability</td>
<td>1</td>
<td>Project site is primarily basalt rock with limited surface soil. Soil condition is buildable.</td>
</tr>
<tr>
<td>Hazards and Nuisances including Site Safety</td>
<td>1</td>
<td>No hazard, nuisance, or site safety condition is identified.</td>
</tr>
<tr>
<td>Energy Consumption</td>
<td>1</td>
<td>Project must comply with current municipal building code energy efficiency requirements.</td>
</tr>
</tbody>
</table>

| Noise - Contribution to Community Noise Levels | 1 | Project’s residential use is not expected to substantially contribute to elevated noise in this built urban environment. |
| Air Quality | 1 | The City of Spokane is not a designated non-attainment area for critical air pollutants. There are no Washington State non-attainment areas per EPA and Spokane Clean Air. |
| Environmental Design | 1 | Multifamily housing is compatible with existing and planned surrounding uses. |

<table>
<thead>
<tr>
<th>Socioeconomic</th>
<th>Code</th>
<th>Source or Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demographic Character Changes</td>
<td>1</td>
<td>Project participates in the current trend of increasing residential development to meet housing supply gaps. Project scope is not sufficient to alter this area’s urban demographic character.</td>
</tr>
<tr>
<td>Displacement</td>
<td>1</td>
<td>Project site displaces one residential unit to be replaced by 47 project units. Project is a 46-housing-unit net gain.</td>
</tr>
<tr>
<td>Employment and Income Patterns</td>
<td>1</td>
<td>Project is located in a built urban area with existing residences, commerce, and services. Project will contribute to and benefit from surrounding employment and economic opportunities.</td>
</tr>
<tr>
<td>Community Facilities and Services</td>
<td>Code</td>
<td>Source or Documentation</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>------</td>
<td>-------------------------</td>
</tr>
<tr>
<td>Educational Facilities</td>
<td>1</td>
<td>Project is served by existing District 81 public schools as well as multiple colleges in and around Spokane.</td>
</tr>
<tr>
<td>Commercial Facilities</td>
<td>1</td>
<td>Project is located within the City of Spokane with commercial facilities widely available throughout.</td>
</tr>
<tr>
<td>Health Care</td>
<td>1</td>
<td>Project is served by healthcare services available throughout the municipality.</td>
</tr>
<tr>
<td>Social Services</td>
<td>1</td>
<td>Project has access to adequate social services available throughout the municipality.</td>
</tr>
<tr>
<td>Solid Waste</td>
<td>1</td>
<td>Project is served by existing municipal solid waste system.</td>
</tr>
<tr>
<td>Waste Water</td>
<td>1</td>
<td>Project is served by municipal wastewater services available adjacent to project site.</td>
</tr>
<tr>
<td>Storm Water</td>
<td>1</td>
<td>Project will comply with municipal building code's storm water requirements including the municipal storm water system.</td>
</tr>
<tr>
<td>Water Supply</td>
<td>1</td>
<td>Project is served by municipal potable water service available adjacent to project site.</td>
</tr>
<tr>
<td>Public Safety</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Police</td>
<td>1</td>
<td>Project is served by existing municipal police service.</td>
</tr>
<tr>
<td>- Fire</td>
<td>1</td>
<td>Project is served by existing municipal fire service.</td>
</tr>
<tr>
<td>- Emergency Medical</td>
<td>1</td>
<td>Project is served by existing emergency medical services.</td>
</tr>
<tr>
<td>Open Space and Recreation</td>
<td>1</td>
<td>Project is served by existing municipal recreation including Riverfront Park</td>
</tr>
<tr>
<td>- Open Space</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Recreation</td>
<td>1</td>
<td>Project is served by existing municipal recreation offered by City of Spokane Parks Department and frequent events in Riverfront Park.</td>
</tr>
<tr>
<td>- Cultural Facilities</td>
<td>1</td>
<td>Project is served by public and private cultural events offered throughout the city.</td>
</tr>
<tr>
<td>Transportation</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Natural Features</th>
<th>Source or Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water Resources</td>
<td>There is no water resource identified on the project site.</td>
</tr>
<tr>
<td>Surface Water</td>
<td>There is no surface water mapped or observed on the project site.</td>
</tr>
<tr>
<td>Unique Natural Features and Agricultural Lands</td>
<td>There is no unique natural feature identified on the project site. Project does not provide agricultural use.</td>
</tr>
<tr>
<td>Vegetation and Wildlife</td>
<td>Project site is rock and scrub in a built urban environment. There is no wildlife evident. There is no effect on critical habitat or endangered species.</td>
</tr>
</tbody>
</table>
### Other Factors

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Source or Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flood Disaster Protection Act [Flood Insurance] [§58.6(a)]</td>
<td>Spokane County participates in the National Insurance Program. Project is not located in a 100-year floodplain. Flood insurance is available but not required for this project site not located within a flood hazard zone.</td>
</tr>
<tr>
<td>Coastal Barrier Resources Act/Coastal Barrier Improvement Act [§58.6(c)]</td>
<td>There is no Coastal Barrier Resource Area in Washington State.</td>
</tr>
<tr>
<td>Airport Runway Clear Zone or Clear Zone Disclosure [§58.6(d)]</td>
<td>Project lies outside the area of influence (including accident and clear zones) of regulated civil and military airfields.</td>
</tr>
<tr>
<td>Other Factors</td>
<td>None</td>
</tr>
</tbody>
</table>

### Summary of Findings and Conclusions

**ALTERNATIVES TO THE PROPOSED ACTION**

**Alternatives and Project Modifications Considered** [24 CFR 58.40(e), Ref. 40 CFR 1508.9]

Other sites were not proposed or considered. There were no site or design modifications not selected due to environmental impact. Adverse environmental impacts are not mapped or observed.

**No Action Alternative** [24 CFR 58.40(e)]

If this residential project is abandoned then this site could remain undeveloped or could be developed as commercial or market-rate housing. In all cases, the project would not then contribute to expanding the supply of affordable rental housing which is currently undersupplied and encouraged by the Comprehensive and Consolidated plans.

**Mitigation Measures Recommended** [24 CFR 58.40(d), 40 CFR 1508.20]

There are no mitigation measures required or recommended.

**Additional Studies Performed**

- 12/2018 GN Norther Phase 1 ESA (utilized as reference materials only)
- 5/19/2020 Plateau Archeological Investigations cultural resources survey
- 7/20/2015 W 315 NEPA Environmental Assessment

**List of Sources, Agencies and Persons Consulted** [40 CFR 1508.9(b)]

- City of Spokane IGIS mapping tool
- Washington Dept. of Archeology & Historic Preservation
- Spokane Tribe of Indians
- Coeur D'Alene Tribe
- Kalspale Tribe
- Confederated Tribes of Warm Springs
- Yakima Nation
- EPA NEPAssist
- HUD DNL Calculator
- Site visit

May 2005

HUD Seattle Region Environmental Office
# Historic Preservation for Washington State

## General Requirements

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
</table>
| Protect sites, buildings, and objects with national, state or local historic, cultural and/or archeological significance. Identify effects of project on properties | National Historic Preservation Act, 16 U.S.C. 470(f), section 106 | 36 CFR Part 800  
24 CFR Part 58.5(a) |

1. **Does the project include repair, rehabilitation or conversion of existing properties; new construction; demolition; the acquisition of undeveloped land; or any activity that requires ground disturbance (defined as one cubic foot of disturbed soil)?**
   - □ No: STOP here. The Section 106 Historic Preservation review is complete.
   - □ Yes: PROCEED to #2  

2. **Does the project involve a structure that is less than 45 years old, is not in a historic district and has no ground disturbing activities?**
   - □ Yes: STOP here. The Section 106 Historic Preservation review is complete.
   - □ No: PROCEED to #3  

3. **Consult with SHPO or THPO and any tribes or groups that may have an interest in the project to determine if the project is eligible for the National Historic Register.**

   - You must define and consider the Area of Potential Effect (APE). The APE is the geographic area within which an undertaking may directly or indirectly cause changes in the character or use of historic properties. The APE is influenced by the scale and nature of an undertaking. (36 CFR Part 800.16).

   - Determine if there are tribes or groups that have an interest in the historic aspects of the project and invite them to participate in the consultation. For ground disturbing activities, you must make a reasonable and good faith effort to identify Indian tribes that may have an interest. HUD’s website lists interested tribes by county: [http://egis.hud.gov/ldat/Tribal.aspx](http://egis.hud.gov/ldat/Tribal.aspx). It is suggested that you go to the Tribal website or contact the SHPO to make sure contact information is current.

   - Consult the State Historic Preservation Officer (SHPO), or if the project is on certain tribal lands, the Tribal Historic Preservation Officer (THPO), with details of the project and project site and your determination if it is eligible for the National Historic Register. SHPO or THPO has 30 days from receipt of a well-documented request of review of your determination. We recommend sending the letter with a return receipt form to document the contact. If they do not respond within the timeframe, or provide a description of additional information needed, you may proceed with the next step of the process based on your finding or consult with the Advisory Council on Historic Preservation (ACHP).


   - State Historic Preservation Officer contacts: [http://www.nps.gov/nr/shpolist.htm](http://www.nps.gov/nr/shpolist.htm)

   - Tribal Historic Preservation Officers contacts: [http://www.nathpo.org/map.html](http://www.nathpo.org/map.html)

---

**No Historic Properties Affected:** STOP here. The Section 106 Historic Preservation review is complete.  
Attach SHPO/THPO concurrence, copies of letters to and from other interested parties and the tribes, and your response to the ERR. IF SHPO/THPO did not respond within 30 days, your dated letter documents
compliance. Record your determination of no historic properties affected on the Statutory Worksheet or Environmental Assessment.

☐ **No Adverse Effect on Historic Property**: STOP here. The Section 106 Historic Preservation review is complete. **Categorically Excluded projects (24 CFR Part 58.35(a)) CANNOT convert to exempt with this determination**.
Attach SHPO/THPO concurrence, copies of letters to and from other interested parties and the tribes, and your response to the ERR. Record your determination of no adverse affect on historic properties on the Statutory Worksheet or Environmental Assessment.

☐ **Adverse Effect on Historic Property**  Resolve Adverse Effects per 800.6 in consultation with SHPO/THPO, the ACHP if participating, and any consulting parties. The loan or grant may not be approved until adverse effects are resolved according to 800.6 or you have complied with 36 CFR Part 800. **Categorically Excluded projects (24 CFR Part 58.35(a)) CANNOT convert to exempt with this determination**.
Make sure that the resolution is fully documented in your ERR with all SHPO/THPO correspondence, copies of letters to and from other interested parties and the tribes, surveys, MOAs etc.

509 W. Sinton: SFR demolished prior to application for federal funds. See City Demolition Permit # B1912700 Demo.

411 W. Sinton: SFR to be demolished for project. SHPO determined "no affect" per MRRRMD 2019-09-0727.

SHPO/THPO Archeological consultations 2/25/20

No historic properties affected.
### Historic Property Report

**Resource Name:** Residence  
**Property ID:** 429155

### Location

![Map of location with house image]

**Address:** 441 W SINTO AVE, SPOKANE, WA 99201  
**Tax No/Parcel No:** 35181.2416  
**Plat/Block/Lot:** STRATTONS ADD W45.25FT L13 B6  
**Geographic Areas:** Spokane County, SPOKANE NW Quadrangle, T25R43E

### Information

<table>
<thead>
<tr>
<th>Number of stories</th>
<th>N/A</th>
</tr>
</thead>
</table>

**Construction Dates:**

<table>
<thead>
<tr>
<th>Construction Type</th>
<th>Year</th>
<th>Circa</th>
</tr>
</thead>
<tbody>
<tr>
<td>Built Date</td>
<td>1905</td>
<td></td>
</tr>
</tbody>
</table>

**Historic Use:**

<table>
<thead>
<tr>
<th>Category</th>
<th>Subcategory</th>
</tr>
</thead>
<tbody>
<tr>
<td>Domestic</td>
<td>Domestic - Single Family House</td>
</tr>
</tbody>
</table>

### Historic Context:

**Category**

**Architecture**

**Architect/Engineer:**

<table>
<thead>
<tr>
<th>Category</th>
<th>Name or Company</th>
</tr>
</thead>
</table>

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Page 1 of 6
**Historic Property Report**

Resource Name: Residence

Property ID: 429155

**Thematics:**

**Local Registers and Districts**

<table>
<thead>
<tr>
<th>Name</th>
<th>Date Listed</th>
<th>Notes</th>
</tr>
</thead>
</table>

**Project History**

<table>
<thead>
<tr>
<th>Project Number, Organization, Project Name</th>
<th>Resource Inventory</th>
<th>SHPO Determination</th>
<th>SHPO Determined By, Determined Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011-08-00128, , Assessors Data Project: Spokane Residential 3</td>
<td>7/12/2011</td>
<td>Not Determined</td>
<td></td>
</tr>
</tbody>
</table>

Planned For Demolition
Historic Property Report

Resource Name: Residence

Property ID: 646853

Location

Address: 509 W SINTO AVE, SPOKANE, WA 99201
Tax No/Parcel No: 35181.3202
Plat/Block/Lot: SROWDERS ADD ALL OF L4 & E5FT OF L5 B5
Geographic Areas: Spokane County, SPOKANE NW Quadrangle, T25R43E18

Information

Number of stories: N/A

Construction Dates:

Construction Type | Year | Circa
Built Date | 1903 | □

Historic Use:

Category | Subcategory
Domestic | Domestic - Single Family House
Domestic | Domestic - Single Family House

Historic Context:

Category: Architecture

Architect/Engineer:

Category | Name or Company

Monday, March 16, 2020
## Historic Property Report

**Resource Name:** Residence

**Property ID:** 646853

### Thematics:

#### Local Registers and Districts

<table>
<thead>
<tr>
<th>Name</th>
<th>Date Listed</th>
<th>Notes</th>
</tr>
</thead>
</table>

### Project History

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<tr>
<th>Project Number, Organization, Project Name</th>
<th>Resource Inventory</th>
<th>SHPO Determination</th>
<th>SHPO Determined By, Determined Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011-11-00244, Assessor’s Data</td>
<td>7/13/2011</td>
<td>Not Determined</td>
<td></td>
</tr>
<tr>
<td>Project: Spokane Residential 5</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

*Demolished prior to Federal Funding Assessment*
June 1, 2020

Mr. Paul Trautman  
Housing & Human Services  
City of Spokane  
808 W Spokane Blvd.  
Spokane, Washington 99201

RE: Sinto Commons Project  
Log No.: 2019-09-07207-HUD

Dear Mr. Trautman;

Thank you for contacting our Department. We have reviewed the professional cultural resources report you provided for the proposed Sinto Commons Project, Spokane, Spokane County, Washington.

We concur with a determination of No Historic Properties Affected with the stipulation for an unanticipated discovery plan.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity must stop, the area secured, and the concerned tribe’s cultural staff and cultural committee and this department notified.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4. Should additional information become available, our assessment may be revised, including information regarding historic properties that have not yet been identified. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,

Robert G. Whitlam, Ph.D.  
State Archaeologist  
(360) 890-2615  
email: rob.whitlam@dahp.wa.gov
DAHP Project Number: 2019-09-07207
Author: Adam Sackman, Tiffany J. Fulkerson, Emily L. Whistler, and David A. Harder
Title of Report: Cultural Resource Survey for the Sinto Commons Community Project, Spokane County, Washington
Date of Report: May 19, 2020
County: Spokane Section: 18 Township: 25 N Range: 43 E
Quad: Name, Spokane NW (1974/1986) Acres: 0.9
PDF of report submitted (REQUIRED) X Yes
Historic Property Inventory Forms to be Approved Online? Yes X No
Archaeological Site(s)/Isolate(s) Found or Amended? Yes X No
TCP(s) found? Yes X No
Replace a draft? Yes X No
Satisfy a DAHP Archaeological Excavation Permit requirement? Yes X No
Were Human Remains Found? Yes DAHP Case # X No
DAHP Archaeological Site #:
Cultural Resource Survey for the Sinto Commons Community Project, Spokane County, Washington

By:
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ARCHAEOLOGICAL INVESTIGATIONS, LLC

May 2020
Cultural Resource Survey for the Sinto Commons Community Project, Spokane County, Washington

Prepared for:
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ABSTRACT
Cultural Resource Survey for the Sinto Commons Community Project, Spokane, Washington

Community Frameworks is in the process of developing a 47-unit multi-family affordable housing project in Spokane. The development will cover five parcels (35181.2416, 35181.3201, 35181.3202, 35181.3203, and 35181.3204), and will include the northern half of the alley located south of, and adjacent to, the aforementioned parcels. The project area covers approximately 0.9 acres and lies in Section 18 of Township 25 North, Range 43 East, Willamette Meridian.

The project will be at least partially funded by federal sources, and as such Community Frameworks must meet the requirements of Section 106 of the National Historic Preservation Act (NHPA) and consider the impacts to any potential historic properties prior to ground-disturbing activities.

Pre-field research included the review of known archaeological resources within a 1.0-mile radius of the area of potential effect (APE) as inventoried at the Washington State Department of Archaeology and Historic Preservation (DAHP). This review was completed using DAHP’s secure electronic database known as the Washington Information System for Architectural and Archaeological Data (WISAARD). This database includes recorded archaeological resources, historic property inventories (HPIs), National Register of Historic Properties (NRHP) and Washington Heritage Register (WHR) properties, identified cemeteries, and previously conducted cultural resource surveys found throughout the state. The DAHP’s predictive model places the APE in “High Risk” for encountering cultural resources, stating that “survey is advised” for this location. Two previously recorded HPIs are located within the Project Area (429155 and 646853). Both properties have been determined to be ineligible for inclusion in the NRHP. Property 646853 had been razed sometime before the commencement of the project.

The fieldwork was completed in a manner consistent with RCW 27.53.030, and included inspection techniques to identify both surface and subsurface archaeological resources. Plateau archaeologists conducted a pedestrian survey over the entire Project Area, and monitored the excavated eight geotechnical test pits. No Native American cultural materials or features were observed during the pedestrian survey or during the monitoring of the geotechnical test pits excavations. Debris, likely from the razing of Property 646853 were found across much of the Project Area. Plateau recommends that the proposed undertaking will result in No Historic Properties Affected, and no further archaeological investigations are recommended prior to, or during, execution of this project.
KEY INFORMATION

PROJECT
Cultural Resource Survey for the Sinto Community Project, Spokane County, Washington

LOCATION
South of W. Sinto Avenue, Spokane

DAHP PROJECT NUMBER
2019-09-07207

USGS QUADS

LEGAL LOCATION OF PROJECT
Section 18 of Township 25 North, Range 43 East

ACREAGE
0.9 acres

PROJECT DATA
Two previously recorded historic properties
No new cultural resources located and/or recorded

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MANAGING AGENCY
Spokane County

PROJECT UNDERTAKEN AND REPORT PREPARED FOR
Community Frameworks

FIELD NOTE DISPOSITION
Archived at the office of Plateau Archaeological Investigations LLC, Pullman.

PRINCIPAL INVESTIGATOR
David A. Harder, M.A.

DATE
May, 2020

CERTIFICATION OF RESULTS
I certify that this investigation was conducted and documented according to Secretary of Interior's Standards and Guidelines and that the report is complete and accurate to the best of my knowledge.  

Signature of Reporter
May 19, 2020
Date
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PROJECT DESCRIPTION AND LOCATION
Community Frameworks is preparing to construct a 47-unit multi-family affordable housing project, situated in Spokane (Figure 1). The development will cover five parcels (35181.2416, 35181.3201, 35181.3202, 35181.3203, and 35181.3204), and measure an approximate maximum length of 245 feet (74.6 meters [m]) (east/west) and 165 ft (50.3 m) (north/south). Anticipated impacts include excavations, compaction of sediments, and other ground-disturbing construction activities. The area of potential impact covers approximately 0.9 acres, and lies within Section 18 of Township 25 North, Range 43 East Willamette Meridian (Figure 2). The area of potential impact hereafter will be referred to as the "Project Area."

The project will be at least partially funded by federal sources, and as such Community Frameworks must meet the requirements of Section 106 of the National Historic Preservation Act (NHPA) and consider the impacts to any potential historic properties prior to ground-disturbing activities.

STATEMENT OF OBJECTIVES
The cultural resource survey of the Sinto Commons Community Project is intended to identify potential historic properties, including archaeological and built environment cultural resources, within the Project Area prior to execution of the proposed project. The pre-field research is designed to identify any known historic properties, including archaeological sites and isolates; historic property inventories of buildings, structures, and historic districts; and cemeteries located in or near the Project Area. Fieldwork procedures are intended to identify areas of moderate to high probability for such cultural resources, previously recorded or otherwise. This report describes the pre-field research, methodology, results, and recommendations for the cultural resources aspect of the proposed project.

PRE-FIELD RESEARCH
Pre-field research included the review of known archaeological resources within a 1.0 mi (1.6 km) radius of the Project Area as inventoried at the Washington State Department of Archaeology and Historic Preservation (DAHP) in Olympia, Washington. This review was completed using DAHP’s secure electronic database known as the Washington Information System for Architectural and Archaeological Data (WISAARD). This database includes recorded archaeological resources, historic property inventories (HPIs), properties and districts on the National Register of Historic Places (NRHP) and the Washington Heritage Register (WHR), identified cemeteries, and previously conducted cultural resource surveys found throughout the state.

Plateau also conducted cartographic analysis of landform, topography, proximity to water using topographic maps, and the United States Department of Agriculture (USDA) online soil survey. Secondary historic resources, on file at the DAHP and the Plateau office in Pullman, were consulted.
Figure 1. The location of the Project Area within Spokane County.
Figure 2. The Project Area on a portion of the Spokane NW USGS topographic map.

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to identify other potential historic resources. In addition, available survey and overview reports and ethnographic accounts of the region were consulted. This background review allows for the identification of previously recorded historic and archaeological resources within or near the Project Area.

ENVIRONMENTAL SETTING
The Project Area lies within the Spokane Valley Outwash Plains, within the Northern Rockies ecoregion (McGrath et al. 2010). The Northern Rockies ecoregion transitions from the Okanagan Highlands of Washington, to expanses of high mountains and low valleys extending across northern Idaho. The predominant draw for Native American and European American populations in this region was, and still is, the extensive river systems and lakes, and the abundance of resources these waterways support. The most significant hydrological feature is the Columbia River, which flows for more than 1,200 miles (mi) (2,000 kilometers [km]) from the base of the Canadian Rockies in southeastern British Columbia to the Pacific Ocean at Astoria, Oregon. Totaled, it drains a 259,000 mi² (431,670 km²) basin. Nine major tributaries to the Columbia—Clark Fork River, Clearwater River, Flathead River, Kettle River, Kootenai River, Pend Oreille River, Priest River, Saint Joe River, and the Spokane River—flow within the ecoregion. Four major lakes—Flathead Lake, Lake Pend Oreille, Payette Lake, and Priest Lake—also comprise the hydrological network. The Spokane River/Nine Mile Reservoir runs 0.4 mi (0.6 km) south of the Project Area.

The Project Area and surrounding regions contained an abundance of life. It is likely, though, that Native Americans had access to a larger variety of species during the past that played a role in aboriginal use, settlement, and travel patterns in relation to the Project Area. The following lists a few of the more discernible mammals that may have been available to aboriginal populations: mule deer (Odocoileus hemionus), raccoon (Procyon lotor), Nuttal cottontail (Sylvilagus nuttalli), mink and weasel (Mustela spp.), yellow-bellied marmot (Marmota flaviventris), woodchuck (Marmota monax), badger (Taxidea taxus), beaver (Castor canadensis), porcupine (Erethizon dorsatum), and several species of ground squirrels (Citellus spp.). Predators include red fox (Vulpes fulva), river otter (Lutra canadensis), coyote (Canis latrans), grizzly bear (Ursus chelan), black bear (Euarctos americanus), and mountain lion (Felis concolor). Several other species may have been present in the region in the past such as wolves (Canis lupus) and even the occasional bison (Bison bison) may have been available prehistorically (Burt and Grossenheider 1961; Ingles 1965, Schroedl 1973).

Many types of fowl and game were available in the past including: Swarth blue grouse (Dendragapus obscurus pallidus), Columbian ruffed grouse (Bonasa umbellus affinis), Columbian sharp-tailed grouse (Pedioecetes phasianellus), western sage grouse (Centrocercus urophasianus phaios), mallard duck (Anas platyrhynchos platyrhynchos), western harlequin duck (Histrionicus histrionicus pacificus), American common merganser (Mergus merganser americanus), the lesser snow goose (Chen hyperborea hyperborea), and the Great Basin Canada goose (Branta canadensis moffitti). Seasonally
available birds such as Gadwall (*Anas strepera*), wood duck (*Aix sponsa*), redhead (*Aythya americana*), and the northern ruddy duck (*Oxyura jamaicensis rubida*) resided in the region during summer. Winter game birds of the region include canvassback (*Aythya valisineria*) and American greater scaup (*Aythya marila nearctica*) (Lothson 1977).

According to Lothson (1977), several species of fish were available in the region (especially along the major river and stream drainages) such as: sturgeon (*Acipenser*), whitefish (*Prosopium*), suckers (*Pantosteus, Catostomus*), bullheads (*Cottus*) and anadromous fish such as salmon (*Oncorhynchus* spp.) and steelhead (*Salmo gairdnerii*). Ray (1942) noted that many of the mentioned fauna were ethnographically used by Native Americans in the region and continue to be an important resource. The author noted several bird species in and near the Project Area and the evidence of deer.

Vegetation in the immediate area falls within the *Pseudotsuga menziesii* vegetation zone, typically occurring between elevations of 1,800 and 3,950 ft (600 and 1,300 m) AMSL (Franklin and Dyrness 1973). The native overstory include Douglas fir (*Pseudotsuga menziesii*), ponderosa pine (*Pinus ponderosa*), lodgepole pine (*Pinus contorta*) and western larch (*Larix occidentalis*). Understory typically consists of low shrubs, including snowberry (*Symphoricarpus albus*), oceanspray (*Holodiscus* spp.), currant (*Ribes* spp.), and various species of rose (*Rosa* spp.) (Franklin and Dyrness 1973). Brown (1982) also notes that arrowleaf balsamroot (*Balsamorhiza sagittata*), bluebunch wheatgrass (*Agropyron spicatum*), common yarrow (*Achillea millefolium*), kinnikinnick (*Arctostaphylos uva-ursi*), Idaho fescue (*Festuca idahoensis*), pinegrass (*Calamagrostis rubescens*), prairie junegrass (*Koeleria macrantha*), strawberry (*Fragaria* spp.), and treetop sagebrush (*Artemisia tripartita*) are commonly associated with the soils located within the Project Area. Many of these plants have been incorporated in Native American use, as medicinal plants, food sources, and other employments.

The Spokane Valley Outwash Plains consist of gently rolling plains that include the southern portion of the Purcell Trench, Rathdrum Prairie, and Spokane Valley. Elevations range from 2,100-2,800 feet (ft) (640.1-853.4 meters [m]). The geology of the region is characterized by pleistocene glacial outwash, flood gravels, and terrace gravels overlain in the south by lacustrine sediments. According to the Natural Resources Conservation Service (2020), the Project Area contains two soil types: Urban land, basalt bedrock substratum and Urban land-Opportunity disturbed complex. Both soil types are characteristic of the disturbed, urban environment which the Project Area is situated within.

The climate in the Columbia Basin was cool and moist at the end of the last glacial period. Gradually, climatic conditions became markedly warmer and dryer by approximately 9,000 years before present (B.P.). The warm dry climatic trend reached its maximum around 6,500 B.P. and then conditions reverted to a cooler and moister regime (Fryxell and Daugherty 1962). Comparatively, the present climate is arid with mild moist winters and hot dry summers (Meinig 1968). The mean seasonal temperatures recorded at the Spokane International Airport weather
station (#457938) between 1889 and 2012 are 29.6° Fahrenheit (F) in winter and 66.9° F in the summer. Extreme temperatures of -25° F and 108° F have been recorded at the same station (Western Regional Climate Center 2020). Yearly precipitation averages 16.13 inches.

**REGIONAL PRECONTACT BACKGROUND**

The Project Area is included in the Plateau culture area, which corresponds roughly to the geographic region drained by the Fraser, Columbia, and Snake Rivers. The Plateau culture area is bordered on the west by the Cascade Mountains and on the east by the Rocky Mountains. The northern border of the culture area is in Canada where it gives way to Arctic culture patterns. The southern border of the Plateau culture area mixes gradually with the Great Basin culture area (Walker 1998:1-3).

A cultural chronology provides a time line describing the adaptation, material culture, subsistence, and sometimes settlement patterns of the people who inhabit a specific area. A culture chronology for the Eastern Plateau was compiled by Roll and Hackenberger (1998), which covers the 9,000 years of human occupation within the area created by the drainage systems of the Kootenai, Pend Oreille, Spokane, Clearwater, and Salmon Rivers. While variation is exhibited between the drainages (specifically the Salmon and Clearwater which support anadromous fish populations, and the Kootenai, Pend Oreille, and Spokane [above Spokane Falls] which do not contain anadromous fish species) three overarching phases were defined for the Eastern Plateau as a whole: the Early Prehistoric (6,000 to 3,000 B.P.), the Middle Prehistoric (3,000 to 1,500 B.P.), and the Late Prehistoric (1,500 to 200 B.P.). The culture chronology of the Eastern Plateau has been discussed at length in Roll and Hackenberger (1998), and, if pertinent, will be discussed further within the results of this report.

**Ethnography**

The Project Area falls within lands traditionally occupied by the Upper Spokane and Coeur d’Alene Indians, both speakers of dialects of Interior Salish, a language shared with neighboring Kalispel, Pend d’Oreille, and Flathead groups (Ross 1998). Three bands of Spokane lived in eastern Washington—Lower Spokane, with a principal settlement near Little Falls; Middle Spokane, occupying Hangman or Latah Creek; and Upper Spokane, who lived along the Little Spokane River and upriver from the junction of Hangman Creek. Ross (1998:271) notes that the Middle and Upper Spokane considered themselves “all one people,” and distinguished themselves from the Lower Spokane. Traditional Coeur d’Alene territory extended over the drainage and headwaters of the Spokane River (Palmer 1998). Prior to Euroamerican settlement into the area, the Coeur d’Alene were subdivided into three divisions—the Spokane River-Coeur d’Alene Lake division, the Coeur d’Alene River division, and the Saint Joe River division.

Traditionally, food procurement activities and the establishment of villages followed a seasonal pattern. Winter habitation sites were occupied during the coldest months of the year, and likely were in place by mid- to late-October. In the subsequent four to five months, stored foods and
game were the primary sources of food. In early spring, when winter supplies began to dwindle, people began making forays to gather emergent root crops (Nelson 1973). Spring, summer, and fall root and berry gathering, as well as hunting and resource processing, took place at areas away from winter villages. Task groups often went to specific areas to hunt, to quarry toolstone, to collect berries, or to gather other resources such as tules to make mats (Aikens 1993:90). The predictability of salmon runs provided a valuable resource for immediate and stored use (Schalk 1977). By the end of summer, reserves of dried salmon and prepared roots were stocked for the winter.

Ethnographically, the Spokane lived in three types of settlements: permanent winter villages, temporary summer and fall villages, and task-specific summer encampments for hunting, plant gathering, and mineral and lithic exploitation (Ross 1998:272). Winter villages, located along the Spokane River, included hunting grounds, resource gathering areas, burial grounds, and sacred sites. Conical semi-subterranean pit houses were constructed for winter villages using poles covered with layers of tule mats or a permanent double-apsidal lodge with an inverted V pole construction covered with tule mats. Summer fishing villages supported relatively large polyglot populations that came together to fish, trade, and entertain. Temporary villages were comprised of many families and were located in seasonal resource areas. Smaller temporary tule mat structures were used in summer villages and encampments (Ross 1998).

Coeur d’Alene house construction differed according to the season. Unlike the Spokane, the Coeur d’Alene did not use semisubterranean pit houses, but used a conical family house in the winter and summer gatherings (Palmer 1998). A communal single or double lean-to lodge was used for gatherings and as training quarters for young people.

For the Spokane, fishing commenced in May at several major fisheries along the Spokane River (Ross 1998). Set nets, traps, leisters, harpoons, hooks, gaffs, and dip nets were used. In sections of narrow streams, crushed granite was used to line stream beds to afford better visibility. The Coeur d’Alene were skilled fishermen, using angling, gaffing, spearing, and netting techniques to catch trout, whitefish, and salmon (Palmer 1998:316). Traps, including screens, cylindrical traps, trap doors, large salmon traps, and weirs were also employed. While many fishing stations were near Lake Coeur d’Alene, along the Saint Joe River, and on Hangman Creek, the Coeur d’Alene would travel to Spokane Falls and parts of the Spokane River for salmon. Others bought dried salmon from the Spokane.

Sprague (2005:41) notes that the Coeur d’Alene had the greatest variety of water craft of any Plateau group. Ethnographic accounts recognized several types of bark-covered canoes, including the flat keel sturgeon nose, curved keel sturgeon nose, and the Kalispel variant of the sturgeon-nose; the Kutenai “Eastern” type elk hide canoe; dugout canoe; tule rafts; and bull boats. Water craft were used for basic transportation, fishing, and hunting. Canoes were used as a base of operation when collecting the water potato (Sagittaria latifolia), which grows in soft mud underwater. Canoes were used in fun pastimes, such as canoe racing and tipping, which in turn
strengthened "canoe fighting" (warfare) skills (Sprague 2005:52). Emphasizing the importance of the canoe in the Coeur d'Alene lifeway is its use in death: canoes were pounded on to announce a death, much like a church bell; fragments of canoes were used as burial markers; and the canoe makes an appearance in legends, most notable is the star constellation called "the canoe" (Sprague 2005:53). Canoes were also used in religion.

In the winter, the Spokane used snowshoes, toboggans, and frozen animal hides to transport heavy loads. The introduction of the horse in the mid-eighteenth century greatly increased their mobility and changed their socioeconomic patterns. Now they were able to travel greater distances and carry heavier loads, as well as having contact with remote Native American cultures.

Places of Cultural Significance
Traditional Cultural Places (TCPs) are important for the "role the property plays in a community's historically rooted beliefs, customs and practices" as stated in the National Register Bulletin 38 (U.S. Department of the Interior 1990). Although these places can be difficult to identify and evaluate from an etic perspective, an initial search of pertinent publications can be helpful toward identifying the types of places that may be expected. The National Register Bulletin 38 goes on to state that "examples of properties possessing such significance include:

- a location associated with the traditional beliefs of a Native American group about its origins, its cultural history, or the nature of the world;
- a rural community whose organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents;
- an urban neighborhood that is the traditional home of a particular cultural group, and that reflects its beliefs and practices;
- a location where Native American religious practitioners have historically gone, and are known or thought to go today, to perform ceremonial activities in accordance with traditional cultural rules of practice; and
- a location where a community has traditionally carried out economic, artistic, or other cultural practices important in maintaining its historic identity."

The Project Area falls within the traditional territories of the Spokane. A review of ethnographies was undertaken to help identify any known TCPs within or near the Project Area. The works of Angelo Anastasio (1972), Jay Miller (1998), Verne F. Ray (1933; 1936; 1939; 1942), John Ross (1998), Robert Ruby, John Brown, and Cary Collins (2010), Allan Smith (1988), and Leslie Spier (1936) were consulted.

As narratives are living, highly functional cultural traditions, they can serve particular or varied motifs. For instance, a single story may be told in different ways in order to serve an intended purpose, such as the transmission of traditional ecological knowledge, to emphasize a moral
imperative, or to explain the unexplainable. As such, the narratives identified here are not detailed, rather accounts of documented legends. For closer examination one is encouraged to seek a more nuanced understanding of the traditions through the Tribes.

Ray (1933:183-184) notes a Sanpoil tale near Davenport. The tale involved Kapu' collecting his horses around Davenport. As he started north toward home, he saw a roaring fire at the end of a canyon before his horses were spooked by the ghost of a crazed Spokane woman who once lived in a winter camp site in that location. The camp site was abandoned after an earthquake, circa 1874.

Clark (1969:116-117) relates The Origin of the Spokane River. It is said that the Spokane lived in terror of a huge monster that consumed all the fish and wildlife, was so strong as to uproot large trees with a single swipe of his hand, and no hunter could kill him. A Spokane girl was collecting berries near the location where the Spokane River now spills into the Columbia River. She came upon the monster sleeping on a hillside. She ran to alert her village and soon the people had the sleeping monster tied up and were beating him. The monster awoke angry, broke through his bindings, and ran eastward toward Lake Coeur d'Alene. As he did, he cut the channel of the Spokane River, and when he reached the lake the water rushed through this channel and into the Columbia River.

Some TCPs, features, or resource collection areas with specific, attributed cultural significance are likely still known to some Native American informants, and reasonably considered sacred and necessarily closely guarded. Given the Spokane Tribes unique relationship with the surrounding landscape and the Tribe's interest in preservation and protection of sacred and traditional places, if additional TCP review is necessary, it is strongly suggested that the Tribe be consulted directly.

REGIONAL HISTORIC BACKGROUND
Contact with peoples on the west coast of the continent was well established by the end of the eighteenth century by British, Spanish, and Russian trading vessels that made regular visits to the coastline. These trading expeditions began the first contact between aboriginal groups and outside cultures. Written historic accounts of the area, though, really begin when Lewis and Clark journeyed through the region in 1805.

In 1809, Oregon Territory saw an influx of trappers and fur traders, beginning with the Canadian-owned North West Company as they made their way into the region and built Spokane House in 1810, located near the confluence of the Spokane River and Hangman Creek. Spokane House became the first permanent European settlement in the State of Washington (McCart and McCart 2000:213). For a time, Spokane House thrived as both a trading center and a gathering place for fur traders. Despite its successes, Spokane House was abandoned in 1816. By that time, trading routes had shifted largely to the Columbia River, leaving the Spokane house no longer logistically or economically important (Meining 1968). In 1825, the Hudson's Bay Company closed Spokane House and moved its local operations north to Fort Colvile at Kettle Falls.

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Subsequent to the opening of the Oregon Trail in 1840, Euroamerican settlers flooded the area, bringing trade, religion and disease into Native-occupied areas. In 1846, the United States took control of the Oregon territory in the Oregon Treaty. With increasing population and economic and political pressures of immigrants and the Whitman massacre, the Territory of Oregon (Oregon Territory) was officially established in 1848. By 1850, nearly 12,000 immigrants had passed through the Plateau region along the Oregon Trail (Beckham 1998; Walker and Sprague 1998). With the establishment of the Oregon Territory in 1848 and Washington Territory in 1853, federal involvement proliferated. Treaties between Native tribes and the new state and federal governments were soon underway.

Washington Governor Isaac Stevens, also appointed as Superintendent of Indian Affairs by President Pierce, worked jointly with Joel Palmer, Superintendent of Indian Affairs in Oregon, to negotiate a series of treaties between 1854 and 1855. These treaties were difficult to maintain in light of the Chinook jargon used in negotiations, rapid influx of miners following the several “rushes,” and settlers who were eager for property. Almost immediately after signing the Walla Walla Council Treaty of 1855, gold was discovered on several promised reservations in the Plateau, and miners began to confiscate the mineral-rich lands. The introduction of disease, treaty violations, and other stresses introduced by the new settlers caused mistrust and eventually, warfare. Several battles took place in the area between 1855 and 1858 during the Plateau Indian War.

During this period of unrest, efforts were made to limit the incursion of immigrants and others into Indian territories. Although settlement was prohibited, it could not be strictly maintained. As General Wool pointed out, “the army cannot furnish guards to farm houses dotted among hostile tribes” (Meinig 1968:165). The settlement prohibition was only a temporary solution to an inevitability. Immigrants settled, and volunteer militias indiscriminately attacked Native residents. The constant unrest culminated in several battles throughout the region.

The unrest continued to culminate, leading to several battles throughout the region. The Steptoe Battlefield Site is located in Rosalia (approximately 31 mi [49.9 km] south of the Project Area, and 3.0 mi (4.8 km) south of Steptoe Butte). Many historical accounts have been published telling various views of the battle, including those of Lieutenant John Mullan and Lieutenant Colonel Steptoe (U.S. War Department [USWD] 1859), Edith Erickson (1985), and James Estes (1974).

Major smallpox epidemics in 1846 and between 1852-1853 severely impacted the Spokane population. In 1881, the Spokane Reservation was established in a greatly reduced area of their traditional lands. A decrease in land meant a decrease in food resources. The installation of dams beginning in 1911 at Little Falls prevented salmon, a major food source, from coming upstream. Non-Native American settlement, disease, and other factors, have taken a toll on the Spokane population, and it was not until the mid-1920s that the population began to see a growth.
The Executive Order of 1873, signed by President Ulysses S. Grant, began a series of land relinquishments by the Coeur d’Alene. Reservation boundaries were delineated as 590,000 acres. Congress enacted an 1891 act further reducing sovereign lands to 400,000 acres. In 1894 the federal government reimbursed the Coeur d’Alene Tribe $15,000 for a one-mile strip of land east of Lake Coeur d’Alene, where squatters had formed the town of Harrison. In 1910, the Dawes Act, or General Allotment Act, of 1887 finally took hold in northern Idaho, reducing land ownership to some 104,000 acres. In 1908 and 1911, the Coeur d’Alene residents of southern Lake Coeur d’Alene were evicted, and the $11,000 compensation was used by the state to develop Heyburn State Park. Currently 70,000 acres are owned by the Tribe and Tribal members within a reservation boundary of some 345,000 acres of sovereign land inclusive of the town centers of Benewah, DeSmet, Plummer, Sanders, Tensed, and Worley (Coeur d’Alene Tribe 2016).

Spokane County
Spokane County was formed on January 29, 1858, annexed by Stevens County on January 19, 1864, and re-created on October 30, 1879. Adjacent counties are Pend Oreille County to the north, Bonner County (Idaho) to the northeast, Kootenai County (Idaho) to the east, Benewah County (Idaho) to the southeast, Whitman County to the south, Lincoln County to the west, and Stevens County to the northwest. Spokane County is the most populous county in eastern Washington and home to the second largest city (Spokane) in the state. After settlement in the 1870s, Spokane became the hub for the mining, timber, and railroad industries of the Inland Northwest. In the surrounding areas, cattle ranging and especially wheat farming became important. Fairchild Air Force Base is the county’s largest employer, and agriculture remains a factor (Colford 2006).

Project Area
The 1874 cadastral map (Tilton 1874) shows several roads and trails crossing the landscape, south of the Spokane River. A limited number of houses are also shown near these transportation routes. No built environments (i.e. houses, structures, roads, trails, etc.) are depicted north of the Spokane River. No built environments are depicted within, or near to, the Project Area.

The 1901 Spokane USGS topographic map shows much urban sprawl around modern day Riverfront Park and extending to both side of the Spokane River. Also noted is the B.M. Oregon and G.R. Railroad line which runs northwest to southeast through the city. Fort Wright is also documented to the West of the city. The area of, and around, the Project Area is depicted as highly urbanized by this point.

The 1950 Spokane USGS topographic map shows that urban growth continued to the north and south of the Spokane River. There has still been little growth of Spokane on the western side of the river. It appears that many of the main roads and highways were in existence in some form by the drawing of this map.
The 1986 Spokane NW USGS topographic map shows Spokane much as it is today. Gonzaga University is in its current location as is Spokane Falls Community College, and the Burlington Northern railroad. It appears that urban sprawl is at its greatest extent, spreading north, south, and east of the river.

Previous Archaeological Research
A review of previously recorded cultural resources and archaeological surveys was completed through the WISAARD on April 20, 2020. The review covered areas within Sections 07, 08, 17, 18, 19 and 20 of Township 25 North, Range 43 East; and Sections 12 and 13 of Township 25 North, Range 42 East. This review revealed seven cultural resources within 1.0 mi (1.6 km) of the Project Area (Table 1).

A total of 45 HPIs have been inventoried, or derived from the Spokane County Assessor’s records, within 1.0 mi (1.6 km) of the Project Area. Of those 45 properties, 21 are eligible for inclusion in the NRHP (Table 2). None of these eligible properties are located in within 0.25 mi. of the Project Area. Two previously recorded HPIs are located within the Project Area (429155 and 646853). Both properties have been determined to be ineligible for inclusion in the NRHP.

Property 429155 is a residence located at 441 W Sinto Avenue. The structure was built in 1905 and first recorded in 2011. In 2019 the property was Determined Not Eligible for inclusion on the NRHP (Artifacts Consulting, Inc. 2011a). The neighboring Property 646853 is situated at 509 W Sinto Avenue. The residence was constructed in 1903 and first recorded in 2011. As with the previous structure, it was Determined Not Eligible for inclusion on the NRHP in 2019 (Artifacts Consulting, Inc. 2011b).

There have been 31 previously conducted cultural resource surveys within 1.0 mi (1.6 km) of the Project Area. None of these of these surveys intersect with the Project Area.

<table>
<thead>
<tr>
<th>Site Number</th>
<th>Site Type</th>
<th>Recorder(s)</th>
<th>Distance from P/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>45SP539</td>
<td>Historic Debris</td>
<td>Morton 2017</td>
<td>0.25 - 0.50 mi S</td>
</tr>
<tr>
<td>45SP778</td>
<td>Historic Train Trestle</td>
<td>Trestle 2018</td>
<td>0.25 - 0.50 mi S</td>
</tr>
<tr>
<td>45SP825</td>
<td>Historic Structure</td>
<td>Tarman 2017</td>
<td>0.5 - 0.75 mi S</td>
</tr>
<tr>
<td>45SP210</td>
<td>Historic Debris</td>
<td>Wyss 1989</td>
<td>0.5 - 0.75 mi S</td>
</tr>
<tr>
<td>45SP794</td>
<td>Historic Debris</td>
<td>Morton 2016</td>
<td>0.5 - 0.75 mi S</td>
</tr>
<tr>
<td>45SP507</td>
<td>Historic Debris</td>
<td>Holstine 1994</td>
<td>0.5 - 0.75 mi S</td>
</tr>
<tr>
<td>45SP735</td>
<td>Precontact Lithic Scatter</td>
<td>Harrison 2013</td>
<td>0.5 - 0.75 mi S</td>
</tr>
</tbody>
</table>

Plateau Archaeological Investigations – 2020
Table 2. NRHP Eligible Historic Properties Inventoried within 1.0 mi of the Project Area.

<table>
<thead>
<tr>
<th>Property</th>
<th>Resource Name</th>
<th>Recorder(s)</th>
<th>Distance from P/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>103396</td>
<td>Nelson House</td>
<td>Unknown 2010</td>
<td>0.25-0.50 mi NW</td>
</tr>
<tr>
<td>708965</td>
<td>Nelson Building</td>
<td>Vann 2018</td>
<td>0.25-0.50 mi E</td>
</tr>
<tr>
<td>24373</td>
<td>Broadview Dairy</td>
<td>Nolan-Wheatley 2015</td>
<td>0.25-0.50 mi S</td>
</tr>
<tr>
<td>658571</td>
<td>827 W. Spofford Avenue</td>
<td>Unknown 2011</td>
<td>0.25-0.50 mi NW</td>
</tr>
<tr>
<td>647533</td>
<td>514 W. Shannon Avenue</td>
<td>Holter 2017</td>
<td>0.25-0.50 mi N</td>
</tr>
<tr>
<td>680586</td>
<td>Suspension Bridge-Riverfront Park</td>
<td>Vann 2019</td>
<td>0.25-0.50 mi S</td>
</tr>
<tr>
<td>21066</td>
<td>Sinto Senior Center</td>
<td>Lancaster 2015</td>
<td>0.25-0.50 mi W</td>
</tr>
<tr>
<td>648051</td>
<td>1128 W. Sinto Avenue</td>
<td>Unknown 2011</td>
<td>0.25-0.50 mi W</td>
</tr>
<tr>
<td>97022</td>
<td>Gwin House</td>
<td>Unknown 2009</td>
<td>0.50-0.75 mi NW</td>
</tr>
<tr>
<td>21005</td>
<td>Edginton House</td>
<td>Unknown 2011</td>
<td>0.50-0.75 mi NW</td>
</tr>
<tr>
<td>33551</td>
<td>Post Street Bridge</td>
<td>Holter 2018</td>
<td>0.50-0.75 mi S</td>
</tr>
<tr>
<td>24300</td>
<td>WA Water Power Substation</td>
<td>Holter 2018</td>
<td>0.50-0.75 mi S</td>
</tr>
<tr>
<td>86240</td>
<td>Luper House</td>
<td>Emerson and Flinn 2008</td>
<td>0.50-0.75 mi SW</td>
</tr>
<tr>
<td>646640</td>
<td>1307 W. Spofford Avenue</td>
<td>Unknown 2011</td>
<td>0.50-0.75 mi W</td>
</tr>
<tr>
<td>108560</td>
<td>1423 W. Mission #2 Avenue</td>
<td>Nooney 2010</td>
<td>0.50-0.75 mi W</td>
</tr>
<tr>
<td>677673</td>
<td>1504 W. College Avenue</td>
<td>Nooney 2015</td>
<td>0.75-1.0 mi SW</td>
</tr>
<tr>
<td>671832</td>
<td>1311 Northwest Boulevard W.</td>
<td>Buehner 2013</td>
<td>0.75-1.0 mi NW</td>
</tr>
<tr>
<td>21913</td>
<td>Carlson House</td>
<td>Unknown 2011</td>
<td>0.75-1.0 mi NW</td>
</tr>
<tr>
<td>675205</td>
<td>Shannon Wade House</td>
<td>Clark 2014</td>
<td>0.75-1.0 mi NW</td>
</tr>
<tr>
<td>671846</td>
<td>1425 W. Montgomery Avenue</td>
<td>Gunn 2017</td>
<td>0.75-1.0 mi NW</td>
</tr>
<tr>
<td>671847</td>
<td>1432 W. Montgomery Avenue</td>
<td>Gunn 2017</td>
<td>0.75-1.0 mi NW</td>
</tr>
</tbody>
</table>

EXPECTED PROPERTIES
Previous archaeological investigations correlate Native American sites with areas that have relatively flat terrain, well drained soils, close proximity to water, and sweeping vistas. Major rivers, such as the Columbia, provided corridors where animals and people moved across the landscape. It is along these rivers that ethnographers and archaeologists have documented large village sites. Residence and food procurement was tied to the seasons, with small creeks typically associated with seasonal hunting and plant gathering by relatively small, task-oriented groups of people. Task campsites might manifest themselves as low to moderate densities of stone tools which are concentrated in one or more loci, hearths, and middens.
Visits through this area may manifest themselves as isolated finds. Typically an item lost or discarded, an “isolate,” provides important information about the types of areas exploited by past populations but is not considered eligible for listing on the NRHP.

The DAHP’s predictive model places the Project Area in an area of “High Risk” for encountering cultural resources (DAHP 2020).

FIELD METHODS AND PROJECT RESULTS
Survey work was completed in accordance with the Secretary of the Interior’s Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716, September 29, 1983) and under the supervision of Plateau’s Principal Investigator, David Harder. Mr. Harder conducted an informal survey of the Project Area and conducted an unmanned aerial system (UAS) flight on March 18, 2020. Plateau archaeologist Tiffany Fulkerson conducted a formal pedestrian survey and monitored the excavation of eight geotechnical test pits on March 20, and returned to the Project Area to conduct an additional survey and further document findings on April 16. Survey conditions were good during all visits, with temperatures reaching the 50s, intermittent cloud cover, and no precipitation. All location data (control points, daily start and end points, cultural materials) were recorded with a handheld GPS unit, and the archaeologists took representative photographs of the Project Area, geotechnical test pits, excavation equipment, and cultural materials. A standardized monitoring log form was filled out, and included such information as weather, time on site, construction equipment used, pit size, sediment characteristic, observed cultural materials, GPS points and photographs taken.

The Project Area includes multiple empty, urban lots (Figure 3). The area lies immediately south of W. Sinto Avenue and includes a portion of the alleyway along the southern edge of the Project Area. The area is primarily vegetated by non-native grasses, brush, and various invasive weeds (Figure 4). The aforementioned HPI, Property 646853 situated at 509 W. Sinto Avenue, is no longer standing.

The archaeologist conducted a pedestrian survey over the entire Project Area. The pedestrian transects were oriented east/west and spaced at intervals no greater than 10 m (32.8 ft). Ground surface visibility varied between 80-90% in the majority of the Project Area to 10-20% in the manicured lawn surrounding the house at 441 W. Sinto Avenue. Vegetation acted as the primary limiting factor in both cases.

Numerous depressions, mounds created from fill, and brick fragments are visible throughout the Project Area. These various large pieces of debris are of higher concentration in the northwest portion of the Project Area. Piles of angular and subangular basalt and granite cobbles are also
Figure 3. The Project Area and field investigation inventoried on an aerial photograph.
found on the top of the mounds of material in the northeast. A shallow, excavated trench was observed in the southeast portion of the Project Area, unrelated to the current project. The remaining foundation of Property 646853 were apparent, as were the remaining foundations of smaller, adjacent structures.

**Archaeological Monitoring of Geotechnical Test Pits**  A total of eight geotechnical test pits were excavated and monitored (Table 3) (Figure 5 and Figure 6). Zeutschel Excavating of Spokane performed all excavations for the project using a John Deere 35D Mini Excavator (Figure 7). All ground disturbing activities were monitored by Ms. Fulkerson. During mechanical excavations, the archaeologist was located in a safe position that allowed for the best possible view of the excavated area. Further, the monitoring archaeologist was outfitted with a high-visibility safety vest, a hard hat, eye protection, and gloves.

The foundation remains (possibly a portion of the basement floor) of Property 646853 were encountered during the excavation of Pit 3. A coal/wood furnace was also uncovered during the excavation of Pit 3 (Figure 8). Various debris and building materials were also recovered from Pit 2, 6, 7, and 8. While none of the material was temporally datable, it was all consistent with materials that would be expected from the razing of Property 646853, or possibly from any associated outbuildings.
Table 3. Monitored Geotechnical Test Pits and Results.

<table>
<thead>
<tr>
<th>Pit #</th>
<th>UTM Z10, NAD 83</th>
<th>Dimensions (E/W x N/S)¹</th>
<th>Depth¹</th>
<th>Soil Profile</th>
<th>Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>468470, 5279720</td>
<td>140 x 75</td>
<td>52</td>
<td>0-52 Strat I*</td>
<td>Negative</td>
</tr>
</tbody>
</table>
| 2     | 468478, 5279697 | 168 x 61                 | 42     | 0-17 Strat I  
                            17-25 Strat II**  
                            25-42 Strat I | Brick fragments at 31 cm |
| 3     | 468485, 5279720 | 402 x 190                | 99     | 0-99 Strat I  | Portion of concrete foundation; coal/wood furnace |
| 4     | 468500, 5279720 | 343 x 141                | 110    | 0-110 Strat I | Negative |
| 5     | 468515, 5279708 | 71 x 155                 | 47     | 0-47 Strat I  | Negative |
| 6     | 468523, 5279697 | 57 x 276                 | 230    | 0-85 Strat I  
                            85-230 Strat III*** | Clay sewer pipe at ca. 85 cm |
| 7     | 468508, 5279686 | 180 x 160                | 250    | 0-72 Strat I  
                            72-106 Strat IV**** | wire cut nail and galvanized pipe |
| 8     | 468470, 5279686 | 78 x 250                 | 70     | 0-72 Strat I  
                            72-250 Strat III | brick fragment at 17 cm; butchered rib and colorless blass bottle base at 42 cm |

¹All measurements in cm  
*Stratigraphy I: Fill with angular basalt cobbles  
**Stratigraphy II: Very dark brown (10YR2/2) sandy silt  
***Stratigraphy III: Flood gravels with bedding of low and high energy deposits  
****Stratigraphy IV: Strong brown (7.5YR4/6) sandy silt with rounded/subangular cobbles and boulders

Ms. Fulkerson intermittently screened soils, focusing on soils which were not of flood gravel origin or of high cobble concentration. Spoils were screened through ¼ inch wire mesh. Sediment characteristics (color, composition, and degree of compaction noted) were described by visual inspection of soil profiles in the trench walls.

No Native American cultural materials or features were observed during the pedestrian survey or during the monitoring of the geotechnical test pits excavations. Debris, likely from the razing of Property 646853 were found across much of the Project Area.
Figure 5. Overview of Pit 2. View to the northeast.

Figure 6. Overview of Pit 4. View to the east.
Figure 7. The John Deere 35D Mini Excavator used for the excavation of all geotechnical test pits.

Figure 8. The coal/wood furnace found during the excavation of Pit 3.
RECOMMENDATIONS AND MANAGEMENT PLAN
Plateau archaeologists conducted a pedestrian survey over the entire Project Area, and monitored the excavated eight geotechnical test pits. No Native American cultural materials or features were observed during the pedestrian survey or during the monitoring of the geotechnical test pits excavations. Debris, likely from the razing of Property 646853 were found across much of the Project Area. Plateau recommends that the proposed undertaking will result in No Historic Properties Affected, and no further archaeological investigations are recommended prior to, or during, execution of this project.

Should ground-disturbing activities reveal any cultural materials (e.g., structural remains, European American artifacts, or Native American artifacts), activity will cease and the Washington State Historic Preservation Officer should be notified immediately. The results and recommendations in this document concern the specified APE. The proponent is advised that the results and recommendations reported herein do not apply to areas of potential effect altered or expanded after the cultural resource survey. A supplementary cultural resource review will be necessary should the APE be altered or changed, as per 36 CFR 800.4.

If ground-disturbing activities encounter human skeletal remains during the course of construction, then all activity will cease that may cause further disturbance to those remains. The area of the find will be secured and protected from further disturbance to those remains. The area of the find will be secured and protected from further disturbance until the State provides notice to proceed. The finding of human skeletal remains will be reported to the county medical examiner/coroner and local law enforcement in the most expeditious manner possible. The remains will not be touched, moved, or further disturbed. The county medical examiner/coroner will assume jurisdiction over the human skeletal remains and make a determination of whether those remains are forensic or non-forensic. If the county medical examiner/coroner determines the remains are non-forensic, then they will report that finding to the DAHP who will then take jurisdiction over the remains. The DAHP will notify any appropriate cemeteries and all affected tribes of the find. The State Physical Anthropologist will make a determination of whether the remains are Indian or Non-Indian and report that finding to any appropriate cemeteries and affected tribes. The DAHP will then handle all consultation with the affected parties as to the future preservation, excavation, and disposition of the remains.
WORKS CITED

Aikens, C. Melvin

Artifacts Consulting, Inc.

Beckham, Stephen D.

Boas, Franz (editor)

Brown, A. Ruth

Burt, William H., and Richard P. Grossenheider

Cebula, Larry
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Clark, Ella E.

Coeur d’Alene Tribe
Colford, Ann M.

Department of Archaeology and Historic Preservation

Erdoes, Richard and Alfonso Ortiz

Erickson, Edith E.

Estes, James F.

Franklin, Jerry F., and C.T. Dyrness

Frey, Rodney

Fryxell, Roald and Richard D. Daugherty

Harrison, James
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Holstine, Craig

Ingles, Lloyd G.
Lothson, Gordon A.  

McCart, Joyce and Peter McCart  

Meining, Donald W.  

Miller, Jay  

Morton, Ashley  

Morton, Ashley  
2017  State of Washington Archaeological Site Inventory Form: 45SP539. On file at the Department of Archaeology and Historic Preservation in Olympia, Washington.

Mullan, John  

Natural Resources Conservation Service  

Nelson, Charles M.  

Palmer, Gary  

Palmer, Gary  

Ray, Verne F.

Ray, Verne F.

Roll, Tom E., and Steven Hackenberger

Ross, John Allan

Ross, John Alan

Ruby, Robert H., and John A. Brown

Ruby, Robert H., John A. Brown, Cary C. Collins

Schalk, Randall F.
Schroedl, Gerald F.

Smith, Allan H.

Spier, Leslie

Sprague, Roderick

Stevens, Harold D.

Tarman, Sylvia

Thompson, M. Terry and Steven M. Egesdal (editors)
2008 Salish Myths and Legends: One People's Stories. University of Nebraska Press, Lincoln, Nebraska.

Tilton, James

Trafzer, Clifford E., and Richard D. Schuerman

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2018 State of Washington Archaeological Site Inventory Form: 45SP778. On file at the Department of Archaeology and Historic Preservation in Olympia, Washington.
U. S. Department of the Interior

U.S. War Department

U.S. Geological Survey
1901  Topographic Map: Spokane 15' Series.
1986  Topographic Map: Spokane NW, Washington 7.5' Series.

Walker, Deward E., Jr.

Walker, Deward E., Jr. and Roderick Sprague

Western Regional Climate Center

Wyss, M.
February 25, 2020

Mr. Paul Trautman
Housing & Human Services
City of Spokane
808 W Spokane Blvd.
Spokane, Washington 99201

RE: Sinto Commons Project
Log No.: 2019-09-07207-HUD

Dear Mr. Trautman;

Thank you for contacting our Department. We have reviewed materials you provided for the proposed Sinto Commons Project at 441-519 S Sinto Avenue, Spokane, Spokane County, Washington.

We concur with your determination of the Area of Potential Effect (APE) as detailed in your letter and illustrated in the associated figures.

We look forward to receiving the results of the professional archaeological survey report, your cultural review, the consultations with the concerned tribes, and your Determination of Effect.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800.

Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 586-3080
e-mail: rob.whitlam@dahp.wa.gov
**PROJECT REVIEW SHEET – EZ1**
**HISTORIC & CULTURAL RESOURCES REVIEW**

**PROPERTY / CLIENT NAME:** Sinto Commons

**FUNDING AGENCY:** HUD

Project Applicant: Community Frameworks

Contact Person: Mary May, Senior Housing Developer

Address: 907 Riverside, Spokane 99201

County: Spokane

Phone: 509-890-1206

E-Mail: marym@communityframeworks.org

**FUNDING AGENCY:** DAHP will email our response directly to the agency/organization contact listed here. The Project Applicant will be copied on the response.

Agency/Organization: City of Spokane CHHS Dept. (Paul Trautman)

Phone: 509-625-6329

Email: ptrautman@spokanecity.org

---

**PLEASE DESCRIBE THE TYPE OF WORK TO BE COMPLETED**
**(Be as detailed as possible to avoid a request for additional information)**

**PLEASE DESCRIBE THE PROPOSED WORK AND DETAIL ALL GROUND DISTURBING ACTIVITIES**

Check if building(s) over 45 years old will be altered or demolished. If so please complete a DAHP EZ-2 form for each building affected before submitting this form. Please include the Project Number generated by Wisaard for the EZ-2 form here: 2019-09-07207

Provide a detailed description of the proposed project:
Demolish one single-family residence at 441 W Sinto, Spokane. Construct one apartment building containing 47 housing units on 5 contiguous parcels. Construction to include ancillary improvements such as parking, playground, trenching, and utilities. Parcel 35181.3202 (509 W Sinto) and parcel 35181.2416 (441 W Sinto) were previously developed. Parcels 35181.3201,35181.3203 and 35181.3204 were not previously developed.

Describe the existing project site conditions (include building age, if applicable):
509 W Sinto: A single-family residence (YB 1903 and WISAARD is off line so project number not available) was demolished August 2019, which was prior to application for federal funds.
441 W Sinto: A single-family residence (YB 1905 and SHPO "not eligible" per WISAARD) is expected to be demolished.
Three adjacent parcels show no evidence of past development.

Describe the proposed ground disturbing activities including the approximate depth:
Excavate to remove existing basement foundation at 441 W Sinto. Excavate at least 2 feet to install foundation, utilities, and drainage.
The City of Spokane proposes to provide federal financial assistance to develop property that includes soil disturbance. The City commenced NEPA review including Section 106 archeological consultation. The City initiated consultation with the following four tribes identified on TDAT as having interest in the City of Spokane. Thirty days have passed since tribal receipt of consultation letters. Section 106 consultation results are as follows:

<table>
<thead>
<tr>
<th>Tribe</th>
<th>Initiated Consultation</th>
<th>Consultation Received</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spokane Tribe of Indians</td>
<td>2/14/20</td>
<td>2/25/20</td>
<td>high risk area</td>
</tr>
<tr>
<td>Coeur d’Alene Tribe</td>
<td>2/14/20</td>
<td>none</td>
<td></td>
</tr>
<tr>
<td>Kalispel Tribe</td>
<td>2/18/20</td>
<td>none</td>
<td></td>
</tr>
<tr>
<td>Confederated Tribes of Warm Springs</td>
<td>2/14/20</td>
<td>none</td>
<td></td>
</tr>
</tbody>
</table>

Considering consultation and lack of consultation to well documented tribal consultations, the City hereby determines that the property has no documented resources and is not eligible for inclusion in the National Register. The City will proceed with its NEPA review per 36 CFR 800.3(c)(4). The property is considered not eligible for inclusion in the National Register and no further review is required.

3/23/20

Paul Trautman, Program Manager       Date
February 25, 2020

To: Paul Trautman, Project Manager

RE: 441-509 W Sinto.

Mr. Trautman,

Thank you for contacting the Tribe’s Historic Preservation Office, we appreciate the opportunity to provide information for protection of cultural resources, the intent of this process is to preserve and protect all cultural resources whenever protection is feasible. We have reviewed your request for the project mentioned above; the APE is considered to be in a high-risk area which would be impacted by the proposed ground disturbing action, whenever working around lakes or wetlands there is a high impact for cultural resources.

Recommendation: Cultural Survey completed by professional archaeologist.

However, if any artifacts or human remains are found upon excavation activity this office is to be notified and the immediate area cease.

Should additional information become available our assessment may be revised.

Again, thank you for this opportunity to comment and consider this a positive action that will assist us in protecting our shared heritage.

If questions arise, please contact me at (509) 258 – 4222.

Sincerely,

Randy Abrahamson
Tribal Historic Preservation Officer
February 11, 2020

Spokane Tribe of Indians
Attn: Randy Abrahamson, THPO
PO Box 100
Wellpinit, WA 99040

Kalispel Tribe
Attn: Francis Cullooyah, Director
PO Box 39
Usk, WA 99180

Coeur D’Alene Tribe
Attn: Jill Wagner, THPO
PO Box 408
Plummer, ID 83851

Confederate Tribes of Warm Springs
Attn: Robert Brunoe, THPO
PO Box C
Warms Springs, OR 9776-3001

RE: NEPA Section 106 Tribal Consultation

Dear THPO:

The City of Spokane CHHS Department invites tribal consultation prior to federal financial assistance to projects including ground disturbance. We welcome tribal documentation of project impact upon known National Register resources. Please contact me at ptrautman@spokanecity.org or (509) 625-6325 with any questions. Thank you for your consultation.

Sincerely,

Paul Trautman, Program Manager

ADDRESS 441 – 509 W Sinto, Spokane, WA     Section: 18  Township: 25  Range: 43
Project Scope: Site clearing and excavation for new construction of apartments as affordable housing. Excavation includes underground utilities, swales, footings, and foundations.
Your item was delivered at 11:08 am on February 18, 2020 in USK, WA 99180.

Tracking Number: 9171999991703902010169

Your item was picked up at the post office at 10:50 am on February 14, 2020 in WARM SPRINGS, OR 97761.
USPS Tracking®

Track Another Package +

Tracking Number: 9171999991703902010152

Your item was picked up at the post office at 1:45 pm on February 14, 2020 in WELLPINIT, WA 99040.

☑ Delivered
February 14, 2020 at 1:45 pm
Delivered, Individual Picked Up at Post Office
WELLPINIT, WA 99040

Get Updates ↪

Text & Email Updates ↪
Return Receipt Electronic ↪
Tracking History ↪
Product Information ↪

See Less ↩

Tracking Number: 9171999991703902010176

Your item was delivered at 11:02 am on February 14, 2020 in PLUMMER, ID 83851.
THPO Consultation – GEO 05-05

Project: Sinto Commons, Community Frameworks
Re: Documenting THPO consultation per

The City of Spokane and Washington State Commerce have proposed financial assistance to this project that includes soil disturbance. The City commenced tribal consultation per Governor’s Executive Order 05-05. The City of Spokane initiated consultation with the Yakima Nation, per this Order. Thirty days have passed since tribal receipt of the consultation request letter. Consultation result is:

<table>
<thead>
<tr>
<th>Tribe</th>
<th>Initiated Consultation</th>
<th>Consultation Received</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Confederated Tribes and Bands of the Yakima Nation</td>
<td>2/19/20</td>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>

Considering these consultation results to this well documented tribal consultations, the City hereby determines that the property has no documented resources and is not eligible for inclusion in the National Register. The project may proceed without further Yakima Nation review.

3/16/20

Paul Trautman, Program Manager Date
February 11, 2020

Confederated Tribes and Bands of the Yakima Nation
Attn: Velma Valdez, THPO
PO Box 151
Toppenish, WA 98948-0151

RE: Tribal Consultation per GEO 05-05

Dear THPO:

The City of Spokane is assisting the nonprofit Community Frameworks in requesting Yakima Nation consultation under GEO 05-05. Washington State Department of Commerce proposes capital funding to the Sinto Commons project which includes ground disturbance. A location map is shown below.

We welcome your comment and documentation on any project impact upon know state or national register resources. Thank you for your consultation.

Please contact me at ptrautman@spokancity.org or (509) 625-6329 with any questions or comments.

Sincerely,

Paul Trautman, Program Manager

ADDRESS 441 – 509 W Sinto, Spokane, WA    Section: 18  Township: 25  Range: 43
Project Scope: Site clearing and excavation for new construction of apartments as affordable housing. Excavation includes underground utilities, swales, footings, and foundations.
Tracking Number: 9171999991703902010145

Your item was delivered at 8:42 am on February 14, 2020 in TOPPENISH, WA 98948.

☑ Delivered
February 14, 2020 at 8:42 am
Delivered
TOPPENISH, WA 98948

Can’t find what you’re looking for?
Go to our FAQs section to find answers to your tracking questions.
# Floodplain Management

**Checklist for HUD or Responsible Entity**

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<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
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<tbody>
<tr>
<td>Avoid the adverse impacts associated with the occupancy and modification of floodplains. Avoid floodplain development whenever there are practicable alternatives.</td>
<td>Executive Order 11988, May 24, 1977</td>
<td>24 CFR Part 55</td>
</tr>
</tbody>
</table>

1. **Is the Project located in a floodway or a 100 or 500-year flood plain?**
   - [ ] For projects in areas mapped by FEMA, maintain the FEMA map panel that includes your project site. Make sure to include the map panel number and date. If FEMA information is unavailable or insufficiently detailed, other Federal, state, tribal or local data may be used as 'best available information.' However, a base flood elevation from an interim or preliminary or non-FEMA source cannot be used if it is lower than the current FIRM and FIS. Include documentation, including a discussion of why this is the best available information for the site.

   **No:** STOP here. The Floodplain Management regulations do not apply. Record your determination that the project is not in a floodplain or floodway.

   **Yes—Floodway. STOP. The National Flood Insurance Program prohibits federal financial assistance for use in a floodway.** The only exception is for functionally dependent uses, such as a marina, a port facility, a waterfront park, a bridge or a dam. If your project is a functionally dependent use in a floodway, proceed to #3

   - [ ] Yes—500-year flood plain (Zone B or X on FEMA maps or best information). **PROCEED to #2**
   - [ ] Yes—100 Year flood plain (Zone A or V on FEMA maps or best information). **PROCEED to #3**
   - [ ] Yes—Flood prone area. **PROCEED to #3**

2. **For projects in the 500-year flood plain: Does your project involve a critical action, defined as an activity for which even a slight chance of flooding would be too great because it might result in loss of life, injury or property damage?** Specific examples include:
   - Structures or facilities that produce, use or store highly volatile, flammable, explosive, toxic or water-reactive materials.
   - Structures or facilities that provide essential and irreplaceable records or utility or emergency services that may become lost or inoperative during flood and storm events (e.g., data storage centers, generating plants, principal utility lines, emergency operations centers including fire and police stations, and roadways providing sole egress from flood-prone areas).
   - Structures or facilities that are likely to contain occupants who may not be sufficiently mobile to avoid loss of life or injury during flood or storm events, e.g., persons who reside in hospitals, nursing homes, convalescent homes, intermediate care facilities, board and care facilities, and retirement service centers. Housing for independent living for the elderly is not considered a critical action.

   [ ] No: STOP here. The project can proceed without further analysis. Record your determination and attach flood plain map and documentation that project does not involve a critical action.

   [ ] Yes: **PROCEED to #3**

3. **Does your project meet one of the categories of proposed action for which Part 55 does not apply?** (Below are several common exemptions—please see 24 CFR 55.12(c) for additional categories of proposed action)
   - The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands but only other certain further conditions (see 24 CFR 55(c)(3)).
Protection of Wetlands
Checklist for HUD or Responsible Entity

<table>
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</thead>
<tbody>
<tr>
<td>Avoid the adverse impacts associated with the destruction and modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative.</td>
<td>Executive Order 11990, May 24 1977</td>
<td>24 CFR Part 55</td>
</tr>
</tbody>
</table>

1. **Does the project include new construction, rehabilitation that expands the footprint of the building, or ground disturbance?**
   - No: STOP here. The Protection of Wetlands executive order does not apply. Record your determination that the project is not in a wetland.
   - Yes: Proceed to #2

2. **Is there a wetland on your project site?**
   - Use both national and local resources to make this determination. A good first step is to check the National Wetlands Inventory’s digital wetlands mapper tool: [http://www.fws.gov/wetlands/Data/Mapper.html](http://www.fws.gov/wetlands/Data/Mapper.html) If site conditions or other documents indicate there may be a wetland, next check with city, county or tribal experts for local wetlands inventories. If none exist, the presence of hydric soils can indicate a wetland. If you suspect a wetland due to soil type or site conditions, you should commission a professional site survey to delineate the wetland and its boundaries.

HUD defines a wetland as those areas that are inundated with surface or ground water with a frequency sufficient to support and under normal circumstances does or would support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds. The definition includes wetlands separated from their natural supply of water and constructed wetlands. **Please note that the US Army Corps of Engineers has a more restrictive definition of wetlands. A determination by the US Army Corps that there is no jurisdictional wetland on site is not sufficient documentation for HUD’s purposes.**

Maintain, in your ERR, all documents you have collected to make your wetlands determination.

- No: STOP here. The Protection of Wetlands executive order does not apply. Record your determination that the project is not in a wetland.
- Yes: Proceed to #3.

3. **Does your project involve new construction in the wetland? New construction includes draining, dredging, channelizing, filling, deepening, impounding, and related activities.**
   - No: STOP here. The Protection of Wetlands executive order does not apply. Record your determination that the project does not involve new construction in a wetland.
   - Yes: Proceed to #4.

4. **Does your project meet one of the categories of proposed action for which the 8-step decision making process does not apply?** (Below are several exemptions that apply to wetlands—please see 24 CFR 55.12(b) and 55.12(c) for additional categories of proposed action)
   - The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property if:
     - The property is cleared of all existing structures and related improvements;
Coastal Zone Management—Washington State
Checklist for HUD or Responsible Entity

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<tr>
<td>Ensure that projects are consistent</td>
<td>Coastal Zone Management Act</td>
<td>15 CFR Part 930</td>
</tr>
<tr>
<td>with the Washington Coastal Zone Management Program</td>
<td>16 U.S.C. 1451-1464</td>
<td></td>
</tr>
</tbody>
</table>

1. Is the project located in Clallam, Grays Harbor, Island, Jefferson, King, Kitsap, Mason, Pacific, Pierce, San Juan, Skagit, Snohomish, Thurston, Wahkiakum or Whatcom Counties?
   - No: Stop here. The CZM review is complete. Record your determination on the EA, Statutory Worksheet or HUD Form 4128.
   - Yes: PROCEED to #2

2. Is the project located on tribal trust lands?
   - Yes: Tribal Trust land is excluded from the state coastal zone. Proceed to #3.
   - No: PROCEED to #4

3. Will the project impact the coastal zone beyond the excluded tribal trust land, for example through water runoff from increased impervious surfaces, or increased sediment loads in waterbodies?
   - Yes: PROCEED to #4
   - No: The Coastal Zone Management review is complete. Document that your project will have no impact on coastal zones outside of the excluded tribal trust land. Record your determination on the Statutory Worksheet, Environmental Assessment form or HUD Form 4128.

4. Does the project include new construction or major rehabilitation of existing structures? Major rehabilitation means work that exceeds the categorical exclusion threshold at 24 CFR Part 58.35(a) and therefore requires a full Environmental Assessment.
   - No: STOP here. The Coastal Zone Management review is complete.
   - Yes: PROCEED to #4

4. Does the project comply with the enforceable policies of the Coastal Zone Management Program?
   - Complete the attached “Certification of Consistency with Washington’s Coastal Zone Management Program,” and send it to the Department of Ecology (DOE) at the following address: Federal Consistency Coordinator, Shorelines & Environmental Assistance Program, Department of Ecology, P.O. Box 47690, Olympia, WA 98504-7690; telephone number: (360) 407-6068 or email it to: cev鐚epermits@ecy.wa.gov. Be sure to identify the Federal Program, i.e., CDBG, Section 202, SHOP, etc. The Applicant is HUD or the Responsible Entity. The first certification on the form should be signed by the lender or non-profit organization that is developing the project. HUD (under Part 50) or the responsible entity (under Part 58) signs the determination that the action will not affect coastal resources (once it has been determined that the project will comply with all enforceable policies of the CZM Program). Ecology has 6 months to concur with a determination, however, they often do so within two weeks if all of the information is submitted.

   - Yes: STOP here. The Coastal Zone Management Review is complete. You should have a mechanism in place (i.e., condition to the contract or FIRM Commitment) to assure the recipient has completed all actions prior to releasing funds. Attach a copy of the Certification and Consistency determination. Record your determination on the EA, Statutory Worksheet or 4128.
   - No: If the project will not comply with all enforceable policies as outlined on the Certification of Consistency, work with Department of Ecology to mitigate issues. Do not initiate the Project until CZM has been mitigated.

**DISCLAIMER:** This document is intended as a tool to help HUD Region X grantees and HUD staff complete NEPA requirements. This document is subject to change. This is not a policy statement, and the Coastal Zone Management Legislation and Regulations take precedence over any information found in this document.
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<tr>
<td>Protect drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.</td>
<td>Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300 et seq., and 21 U.S.C. 349)</td>
<td>40 CFR 149.2</td>
</tr>
</tbody>
</table>

1. Is the project located on a sole source aquifer (SSA) review area which includes the aquifer and streamflow source areas? (Note: There are currently no sole source aquifers in Alaska.)

- [ ] Maintain, in your ERR, a copy of the latest SSA review area map, marked with your project location.
  http://yosemite.epa.gov/r10/water.nsf/Sole+Source+Aquifers/ssfamaps
- Make sure you consider streamflow source areas.

- No: STOP here. The Sole Source Aquifer authority does not apply. Record your determination.
- Yes: PROCEED to #2

2. Is the project located in Idaho?

- No: PROCEED to #3

3. Does the project consist of an individual action on a one-to-four unit residential building (including acquisition, disposition, new construction and rehabilitation) that meets all applicable local and state groundwater regulations?

- Yes: STOP here. The project is not likely to affect Sole Source Aquifer quality. Record your determination on the Statutory Worksheet.
- No: PROCEED to #4

4. Does the project consist of acquisition, disposition or rehabilitation of a multifamily (5 or more dwelling units) residential building, commercial building or public facility that does not increase size or capacity and meets all applicable local and state groundwater regulations?

- Yes: STOP here. The project is not likely to affect Sole Source Aquifer quality. Record your determination on the Statutory Worksheet.
- No: PROCEED to #5

5. Does the project consist of new construction or rehabilitation that increases size or capacity of a multifamily building, commercial building or public facility that meets all applicable local/state groundwater regulations AND is served by public water, sewer and storm drainage systems. (If the project uses well water or a septic system or infiltrates storm-water on site, you must proceed to Step #6.)

- Yes: STOP here. The project is not likely to affect Sole Source Aquifer quality. Record your determination on the Statutory Worksheet.
- No: PROCEED to #6
City of Spokane Map

Legend

Lines
- Override 1
- City of Spokane Boundary

Aquifer
- Spokane-Rathdrum

To Common Site is
not located on the
Spokane-Rathdrum aquifer.

City of Spokane GIS

2/21/2020
Endangered Species Act No Effect Guidance for Washington State
(Prepared in collaboration with the U.S. Fish and Wildlife Service and NOAA Fisheries. Applies in Washington State only.)
24 CFR Part 58

<table>
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<tr>
<th>General requirements</th>
<th>ESA Legislation</th>
<th>HUD Regulations</th>
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<tbody>
<tr>
<td>Section 7 of the Endangered Species Act mandates that actions that are authorized, funded, or carried out by Federal agencies do not jeopardize the continued existence of plants and animals that are listed or result in the adverse modification or destruction of designated critical habitat.</td>
<td>The Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.; particularly section 7)</td>
<td>24 CFR 58.5(e) 24 CFR 50.4(e)</td>
</tr>
</tbody>
</table>

**Purpose:** The purpose of this checklist is to assist HUD and responsible entities meet their Endangered Species Act obligations. A determination of “no effect” to federally listed species and critical habitat fulfills HUD’s and the responsible entity’s obligation to ensure actions it authorizes, funds, or carries out do not jeopardize the continued existence of listed species or adversely modify designated critical habitat. “No effect” determinations do not require coordination with or approval from the U.S. Fish and Wildlife Service and/or NOAA Fisheries.

**Definition:** “No effect” – the appropriate determination when the proposed action, including its interrelated and interdependent actions, will not affect (i.e., influence or bring about any change) listed species or designated critical habitat either directly or indirectly.

The following questions will help you determine if the proposed project will have an effect to federally listed species or designated critical habitat. The list of activities is not all-inclusive, but provides examples of typical types of projects that would meet a “no effect” determination.

1. Does the project consist solely of the following activities: purchasing existing buildings; completing interior renovations to existing structures; replacement or repairs to existing roofs (not including galvanized material unless it has been sealed or otherwise confined so that it will not leach into stormwater); replacing exterior paint or siding on existing buildings; adding sprinkler systems or repairing landscape, not including removing trees or shrubs?

   - Yes: STOP here. The project will have No Effect on listed or proposed species, and designated or proposed critical habitat. Consultation with the U.S. Fish and Wildlife Service and/or NOAA Fisheries is not required. Record your determination of no effect and maintain this documentation in your ERR.
   - No: PROCEED to #2

2. Does the project consist solely of the any of the following activities and not result in an increase of impervious surface, removal of trees, or removal of streamside vegetation: rehabilitation of an existing structure; reconstruction or repair to existing curbs, sidewalks or other concrete structures; repairs to existing parking lots (for example repairing pot holes or repainting lines – not expansions); purchasing or installing appliances?

   - Yes: STOP here. The project will have No Effect on listed or proposed species, and designated or proposed critical habitat. Consultation with the U.S. Fish and Wildlife Service and/or NOAA Fisheries is not required. Record your determination of no effect and maintain this documentation in your ERR.
   - No: PROCEED to #3

3. If new construction, does construction occur on a previously developed parcel and meet all of the following criteria: does not add new impervious surfaces; does not remove trees or streamside/riparian vegetation; complies with all state and local building codes and stormwater regulations; infiltrates all stormwater or does not discharge stormwater to a salmonid-bearing stream or proposed/designated critical habitat.

HUD Region X Environmental Office – May 2006
Yes: STOP here. The project will have No Effect on listed or proposed species, and designated or proposed critical habitat. Consultation with the U.S. Fish and Wildlife Service and/or NOAA Fisheries is not required. Record your determination of no effect and maintain this documentation, including information about the stormwater discharge, in your ERR.

No: PROCEED to #4

4. If new construction does construction add new impervious surfaces to a previously developed parcel and meet all of the following criteria: does not remove trees or streamside/riparian vegetation; complies with all state and local building codes and stormwater regulations; discharges treated stormwater to non-salmonid-bearing stream within the same subbasin (discharge point must be a minimum of ¼ mile from salmonid bearing stream or proposed/designated critical habitat) or infiltrates all treated stormwater within the same subbasin.

Yes: STOP here. The project will have No Effect on listed or proposed species, and designated or proposed critical habitat. Consultation with the U.S. Fish and Wildlife Service and/or NOAA Fisheries is not required. Record your determination and maintain this documentation, including information about the stormwater discharge, in your ERR.

No: PROCEED to #5

5. Would project effects, including those that extend beyond the project site (e.g., noise, air pollution, water quality, stormwater discharge, visual disturbance), overlap with identified federally listed or proposed species occurrences or designated or proposed critical habitat or potential habitat (e.g., roosting, feeding, nesting, spawning, rearing, overwintering sites, or migratory corridors) for listed species?

For USFWS, please visit the following website to order a site-specific species list from the State Department of Wildlife and Fish: www.wdfw.wa.gov/hab/release. The process takes one to eight weeks and costs $40.

For NOAA Fisheries, please visit this website to determine the location of listed species:

www.streamnet.org (click “Interactive Mapper”)

No: STOP here. The project will have No Effect on listed or proposed species, and designated or proposed critical habitat. Consultation with the U.S. Fish and Wildlife Service and/or NOAA Fisheries is not required. Record your determination of no effect and maintain this documentation in your ERR.

Yes: The project may affect listed or proposed species, or designated or proposed critical habitat. Consultation with the USFWS and/or NOAA Fisheries may be required.

Working Toward Recovery: The Endangered Species Act requires that all federal agencies utilize their authorities to help conserve listed species. Therefore, as responsible entities, you are encouraged to minimize the effects of your actions on listed species, designated critical habitat and habitat identified in endangered species recovery plans. For your activities, you are especially encouraged to minimize your action’s contribution to water quality degradation from point and non-point discharges, and water quantity alteration due to increased impervious surfaces. Information on low impact development can be found at www.epa.gov/nps/lid/lidlit.html.

DISCLAIMER: This document is intended as a tool to help grantees and HUD staff complete NEPA requirements. This document is subject to change. This is not a policy statement, and the Endangered Species Act and associated regulations take precedence over any information found in this document.

Questions concerning environmental requirements relative to HUD programs can be addressed to Deborah Peavler-Stewart (206) 220-5414 or Sara Jensen (206) 220-5226.
ATTACHMENT D

Wild and Scenic Rivers

Checklist for HUD or Responsible Entity

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<td>scenic rivers designated as components or potential components of the National Wild</td>
<td></td>
<td>24 CFR 50.4(f)</td>
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<tr>
<td>and Scenic Rivers System from the effects of construction.</td>
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</table>

1. Is your project within proximity of a Wild and Scenic River?

You must consider Designated Wild and Scenic Rivers (http://www.rivers.gov/map.php); Study Wild and Scenic Rivers (http://www.rivers.gov/study.php) and rivers on the Nationwide Rivers Inventory (http://www.nps.gov/nrur/programs/rtca/nri/)

☐ No: STOP here. Project is in compliance with this section. Attach documentation used to make your determination, such as a map identifying the project site and its surrounding area or a list of rivers in your region.

☐ Yes: the project is in proximity of a Designation Wild and Scenic River or Study Wild and Scenic River. PROCEED to #2

☐ Yes: the project is in proximity of Nationwide Rivers Inventory (NRI) river. PROCEED to #3

2. Is your project a Water Resources project?

A Water Resources Project is a federally assisted project that could affect the free-flowing condition of a Wild and Scenic River. Examples include dams, water diversion projects, bridges, roadway construction, boat ramps, and activities that require a Section 404 permit from the Army Corps of Engineers. New construction that could increase storm water runoff should also be considered.

☐ No: STOP here. Project is in compliance with this section. Please attach all necessary supporting documentation.

☐ Yes: PROCEED to #3.

3. Could the project do any of the following:
   - Have a direct and adverse effect within Wild and Scenic River Boundaries
   - Invade the area or unreasonably diminish the river outside the Wild and Scenic River Boundaries?
   - Have an adverse effect on the natural, cultural, and/or recreational values of a NRI segment?

For designated and study wild and scenic rivers, consult with the appropriate federal/state/local/tribal Managing Agency, pursuant to Section 7 of the Act, to determine if the proposed project may have an adverse effect. For NRI rivers, consult with the National Park Service pursuant to Section 5 of the Act to determine if your project will have an adverse effect.
Nationwide Rivers Inventory
This is a listing of more than 3,200 free-flowing river segments in the U.S....
Clean Air Act Compliance
Checklist for HUD or Responsible Entity

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<tr>
<td>EPA requires federal actions to conform to State or Federal Action Plans for air quality.</td>
<td>Clean Air Act (42 U.S.C. 7401 et seq.) as amended</td>
<td>40 CFR Parts 6, 51 and 93</td>
</tr>
</tbody>
</table>

1. **Does your project require an environmental assessment level review for new construction or major rehabilitation of existing structures?**

   □ No: STOP here. The Clean Air Act conformity requirements do not apply. Record your determination.
   X Yes: PROCEED to #2

2. **Is the project located in a designated non-attainment area for criteria air pollutants?**

   Maintain, in your ERR, either a map or list of non-attainment areas in your region. You can view a list of non-attainment areas by state at this website: http://www.epa.gov/oar/oarqps/greenbk/ancl2.html. Each state also maintains a regional list, please see attached contact information for details.

   X No: STOP here. The Clean Air Act conformity requirements do not apply. Record your determination.
   □ Yes: PROCEED to #3

3. **Does your project exceed de minimis impact criteria?**

   Determine if your project will result in emissions (both direct and indirect) that exceed the de minimis thresholds established for each criteria pollutant at 40 CFR Part 93.153 (see attached). In general, HUD projects will not exceed this threshold. However, you should work with your local air quality authority to determine whether your project may have an impact on air quality. For PM-10 (dust and particulate matter) non-attainment areas, please make special note of any local dust control regulations that might apply during construction. Please see attached document for air authority contacts in Alaska, Oregon and Idaho. For Washington contacts, please visit http://www.ecy.wa.gov/programs/air/pdfs/Control_Officers.pdf.

   □ No: STOP here. The project does not impact air quality. Record your determination on the Statutory Worksheet and attach documentation.
   □ Yes: PROCEED to #4

4. **Does your project conform with the State or Federal Action Plan for air quality?**

   Work with your local or state air quality authority to determine if your project conforms with your State Action plan. If you cannot reach this determination, please contact your HUD environmental officers for further guidance.

**DISCLAIMER:** This document is intended as a tool to help grantees and HUD staff complete HUD environmental requirements. This document is subject to change. This is not a policy statement, and the Clean Air Act Legislation and Regulations take precedence over any information found in this document.

Questions concerning environmental requirements relative to HUD programs can be addressed to Deborah Peavler-Stewart (206) 220 5414 or Sara Jensen (206) 220 5226.

HUD Region X Environmental Office – October 2004
Guam - Piti and Tanguisson Counties are designated nonattainment for the SO2 NAAQS

* The National Ambient Air Quality Standards (NAAQS) are health standards for Carbon Monoxide, Lead (1978 and 2008), Nitrogen Dioxide, 8-hour Ozone (2008), Particulate Matter (PM-10 and PM-2.5 (1997, 2006 and 2012), and Sulfur Dioxide. (1971 and 2010)

** Included in the counts are counties designated for NAAQS and revised NAAQS pollutants. Revoked 1-hour (1979) and 8-hour Ozone (1997) are excluded. Partial counties, those with part of the county designated nonattainment and part attainment, are shown as full counties on the map.
Air Quality Reports, Studies, and Maps

Air Quality Reports:
- Archived monthly summaries of air quality data
- Chart of Air Quality Index (AQI) days every moderate from Jan 1, 1992 - August 31, 2015

Determining Attainment of Air Quality Standards:

When EPA sets or revises a national standard, Washington uses air monitoring data to determine if air quality in the state meets the new or revised standard. Based on this data, Washington can make recommendations to EPA about how to designate areas of the state. EPA will make the final decision about how to designate each area. Possible designations are:
- Attainment (meeting a standard)
- Nonattainment (not meeting a standard)
- Unclassifiable (not enough information to classify)
- Air Quality State Implementation Plans (SIPs)

In the past, Spokane has been in nonattainment for both carbon monoxide (CO) and Particulate Matter (PM10). We are in attainment now and below are related attainment and maintenance plans. The Federal Clean Air Act requires states to develop plans for protecting and maintaining air quality in all areas of the state. It also requires states to develop specific plans for bringing nonattainment areas back into attainment. The plans are called State Implementation Plans (SIPs). Learn more about SIPs and see SIP documents.

Carbon Monoxide (CO)
- Spokane CO Limited Maintenance Plan, 2015-2025, Appendix C, D, E
- Spokane CO Limited Maintenance Plan, 2015-2025, Appendix C, D, E
- Spokane CO SIP and related docs, 1997

Particulate Matter (PM10)
- Spokane PM10 Limited Maintenance Plan (LMP), 2015-2025, Federal Register: Approval of PM10 LMP
- Spokane Solid Fuel Operation (SFO) LMP, 2015-2025, Federal Register: Approval of SFO LMP
- Spokane PM10 SIP and related docs, 1997

Emissions Inventory

The Washington State Department of Ecology conducts a comprehensive Emissions Inventory for the state every three years, which includes detailed information about emissions for specific source categories (e.g., railroads or outdoor burning) by county.

Special Projects in the Spokane area:
- Air Trend Study - Community Assessment 2005-2006
- Spokane's BNSF Rail Yard Review
  Related documents:
  - GLA A regarding Spokane's BNSF Rail Yard Review
  - Washington State Dept of Health Cancer Cluster Report

3104 E Augusta Ave, Spokane, WA 99207 • (509) 477-4727 • working with you for clean air
# Farmland Protection

**Checklist for HUD or Responsible Entity**

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1. **Is the Project located on a site currently zoned as residential, commercial or industrial?**

   □ Maintain, in your ERR, a map of the project location, including zoning information.


   □ No: PROCEED to #2

2. **Does your project fall on prime farmland regulated under the Farmland Protection Policy Act?**

   Check with the USDA Natural Resources Conservation Service (NRCS) [http://www.wa.nrcs.usda.gov/](http://www.wa.nrcs.usda.gov/) or with your city or county planning department to determine if your site is on farmland regulated under the act. Farmland regulated under the Act includes prime farmland, unique farmland and land of statewide or local importance. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forestland, pastureland, cropland or other land, but not water or urban built-up land.

   □ No: STOP here. The project does not convert farmland to nonagricultural purposes. Record your determination on the Statutory Worksheet and attach documentation.

   □ Yes: PROCEED to #3

3. **Does your project meet one of the following exemptions?**

   - Projects on land already in urban development or used for water storage.
   - Construction of on-farm structures needed for farm operations.

   □ Yes: Stop here. Maintain copies of all of the documents you have used to make your determination.

   □ No: Complete form AD-1006, “Farmland Conversion Impact Rating” and send to the local NRCS District Conservationist. You can find a PDF version of this form at [http://www.nrcs.usda.gov/programs/fppa/](http://www.nrcs.usda.gov/programs/fppa/). NRCS has 45 days to make a determination. Work with NRCS until your project will have minimum impact on the protected farmland, but the final decision belongs to HUD or the Responsible Entity.

---

**DISCLAIMER:** This document is intended as a tool to help grantees and HUD staff complete NEPA requirements. This document is subject to change. This is not a policy statement, and the Farmland Protection Legislation and Regulations take precedence over any information found in this document.

Questions concerning environmental requirements relative to HUD programs can be addressed to Deborah Peaveler-Stewart (206) 220 5414 or Sara Jensen (206) 220 5226
Environmental Justice
Checklist for HUD or Responsible Entity

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address disproportionately high and adverse human health or environmental effects on</td>
<td>Executive Order 12898,</td>
<td>24 CFR 50.4(l) and 24 CFR 58.5(j).</td>
</tr>
<tr>
<td>minority and low-income populations.</td>
<td>February 11, 2004</td>
<td></td>
</tr>
</tbody>
</table>

1. Is there an adverse environmental impact caused by the proposed action, or is the proposed action subject to an adverse environmental impact?

This question is designed to determine how the Environmental Justice analysis is reflected in the environmental review as a whole. Your consideration of the other environmental laws and authorities is your supporting documentation for this question. If any other environmental law or authority required mitigation (i.e., 8-step process for locating in a flood plain, waiver of noise requirements), then there is an adverse environmental impact.

No: STOP here. The project does not pose an Environmental Justice concern.
Yes: PROCEED to #2

2. Will the project have a disproportionate impact on low-income or minority populations?

The following steps will help you make this determination:

1) Describe the project.
2) Consider historic uses of the site, past land uses and patterns (such as lending discrimination and exclusionary zoning).
3) Determine the demographic profile of the people using the project and/or living and working in the vicinity of the project. EPA’s environmental justice geographic assessment tool provides helpful demographic information: [http://epaemap14.epa.gov/ejmap/entry.html](http://epaemap14.epa.gov/ejmap/entry.html)
4) Describe the adverse environmental impact you identified in your environmental review. Identify adjacent land uses, paying particular attention to toxic sites, dumps, incinerators, hazardous materials (e.g. asbestos), and other issues with the potential to have adverse human health effects. (This may already have been considered in your review of toxic and hazardous substances.)
5) Consider how the adverse environmental impact and any potentially harmful adjacent land uses would impact the people using and/or surrounding the project.
6) Consider whether market-rate development exists in the area. If not, would this project succeed as a market-rate project at the proposed site?

No: STOP here. Maintain documentation concerning your determination of no disproportionate impact.
Yes: Consult with HUD environmental staff to develop a mitigation plan. An Environmental Justice mitigation plan must include public outreach, participation and community involvement. The project cannot move forward until the EJ issue is mitigated to the satisfaction of HUD or the Responsible Entity and the impacted community.

DISCLAIMER: This document is intended as a tool to help Region X HUD grantees and HUD staff complete environmental requirements. This document is subject to change. This is not a policy statement. Legislation and Regulations take precedence over any information found in this document.
Noise Abatement and Control
Checklist for HUD or Responsible Entity

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Encourage land use patterns for housing and other noise sensitive urban needs that will provide a suitable separation between them and major noise sources</td>
<td>Noise Control Act of 1972</td>
<td>24 CFR Part 51 Subpart B</td>
</tr>
<tr>
<td></td>
<td>The Quiet Communities Act of 1978 as amended</td>
<td>Noise Guidebook</td>
</tr>
<tr>
<td></td>
<td>OMB Circular 75-2, “Comparable Land Uses at Federal Airfields”</td>
<td></td>
</tr>
</tbody>
</table>

1. Is the project for new construction, purchase or resale of existing, modernization, or rehabilitation of noise sensitive use (i.e., housing, mobile home parks, nursing homes, hospitals, and other non-housing uses where quiet is integral to the project’s function, e.g., libraries)?

☐ No: STOP here. The project is not subject to the noise standards. Maintain documentation on the nature of the project. Record your determination that the project is not subject to the noise standards in your Environmental Review Record (ERR).
☐ Yes: PROCEED to #2

2. Is the project located within 1,000 feet of a busy road or highway, 3,000 feet of a railroad, or 15 miles of a civil airport or military airfield? Are there any other potential noise sources in the project vicinity that could produce a noise level above HUD’s acceptable range, including but not limited to concert halls, night clubs, event facilities, etc.?

☐ No: STOP here. Maintain a map identifying distances from roads, railroads and airports and your project. Record your determination. You do not need to calculate a specific noise level.
☐ Yes: PROCEED to #3

3. Determine the actions to take based on the project and HUD Acceptability Standards.
Is the activity for:
☐ Construction of new noise sensitive use. Calculate noise using HUD standards or online tool: https://www.hudexchange.info/environmental-review/dnl-calculator PROFCEED to 3.a
☐ Purchase or resale of existing buildings (existing buildings are either more than 1 year old or buildings for which this is the second or subsequent purchaser). Noise calculation is not required. HUD or RE determines need based on their evaluation of project. Proceed to 3.b
☐ Modernization. Noise calculation is not required. HUD or RE determines need based on their evaluation of project. Proceed to 3.c
☐ Major or substantial rehabilitation (use the definition contained in the specific program guidelines). Calculate noise using HUD standards or online tool: https://www.hudexchange.info/environmental-review/dnl-calculator Proceed to 3.d

<table>
<thead>
<tr>
<th>HUD General Acceptability Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>HUD determination</strong></td>
</tr>
<tr>
<td>Acceptable</td>
</tr>
<tr>
<td>Normally Unacceptable</td>
</tr>
<tr>
<td>Unacceptable</td>
</tr>
</tbody>
</table>
Noise Abatement and Control
Checklist for HUD or Responsible Entity

New Construction

Is the Day-Night average sound level:

☐ Above 75 dB. Construction of new noise sensitive uses is generally prohibited, an EIS is required prior to the approval. The Assistant Secretary or Certifying Officer may waive the EIS requirement in cases where noise is the only environmental issue and no outdoor sensitive activity will take place on the site. (Under § Part 50 approval is required of the Assistant Secretary for CPD, under § Part 58 the Certifying Officer must provide approval). The project must be mitigated to acceptable standards. Document the ERR with the noise calculation, EIS, EIS waiver if approved, mitigation requirements and when complete, evidence of mitigation.

☐ Above 65 dB but not exceeding 75 dB. Construction of new noise sensitive uses is discouraged — all new projects require special environmental reviews and may require special approvals prior to construction (except when the threshold has been shifted to 70 dB as described below). Information is provided at 51.104 (b)(1). Document ERR include the noise calculation, special review and approval. Document mitigation requirements and when complete, evidence of mitigation.

☐ Not exceeding 65 dB. (this threshold may be shifted to 70 dB on a case-by-case basis when 6 specific conditions are satisfied as described at Section 51.105(a)). Noise levels are acceptable. Document the noise calculation in the ERR

CALCULATED DNL 56.2

b. Purchase or Resale of Existing Building

Is the Day-Night average sound level above an acceptable level (based on noise calculation or your analysis of the site using maps or a site visit)?

☐ Yes. Consider environmental noise as a marketability factor when considering the amount of insurance or assistance that will be provided to the project? Noise exposure by itself will not result in the denial of HUD support for the resale and purchase of otherwise acceptable existing buildings. Record your determination in the ERR.

☐ No. Record your determination in the ERR

c. Modernization

Is the Day-Night average sound level above an acceptable level (based on noise calculation or your analysis of the site using maps or a site visit)?

☐ Yes. Encourage noise attenuation features in alterations. Record your determination in the ERR. Identify how you are encouraging noise attenuation

☐ No. Record your determination in the ERR

d. Major or Substantial Rehabilitation

Is the Day-Night average sound level:

☐ Above 75 dB. HUD or the RE shall actively seek to have project sponsors incorporate noise attenuation features, given the extent and nature of the rehabilitation being undertaken and the level of exterior noise exposure and will strongly encourage conversion of the noise exposed sites to land uses compatible with the high noise levels. Document the ERR include the noise calculation and efforts taken to encourage noise attenuation.

☐ Above 65 dB but not exceeding 75 dB. HUD or the RE shall actively seek to have project sponsors incorporate noise attenuation features, given the extent and nature of the rehabilitation being undertaken and the level of exterior noise exposure Document ERR include the noise calculation and efforts taken to encourage noise attenuation.

☐ Not exceeding 65 dB. (this threshold may be shifted to 70 dB on a case-by-case basis when 6 specific conditions are satisfied as described at Section 51.105(a)). Noise levels are acceptable. Document the ERR with the noise calculation.

DISCLAIMER: This document is intended as a tool to help Region X HUD grantees and HUD staff complete environmental requirements. This document is subject to change. This is not a policy statement, refer to the 24CFR Part 51 Subpart B and the Noise Guidebook for specific guidance.
DNL Calculator

**WARNING:** HUD recommends the use of Microsoft Internet Explorer for performing noise calculations. The HUD Noise Calculator has an error when using Google Chrome unless the cache is cleared before each use of the calculator. HUD is aware of the problem and working to fix it in the programming of the calculator.

The Day/Night Noise Level Calculator is an electronic assessment tool that calculates the Day/Night Noise Level (DNL) from roadway and railway traffic. For more information on using the DNL calculator, view the [Day/Night Noise Level Calculator Electronic Assessment Tool Overview](/programs/environmental-review/daynight-noise-level-electronic-assessment-tool/).

**Guidelines**

- To display the Road and/or Rail DNL calculator(s), click on the "Add Road Source" and/or "Add Rail Source" button(s) below.
- All Road and Rail input values must be positive non-decimal numbers.
- All Road and/or Rail DNL value(s) must be calculated separately before calculating the Site DNL.
- All checkboxes that apply must be checked for vehicles and trains in the tables' headers.
- **Note #1:** Tooltips, containing field specific information, have been added in this tool and may be accessed by hovering over all the respective data fields (site identification, roadway and railway assessment, DNL calculation results, roadway and railway input variables) with the mouse.
- **Note #2:** DNL Calculator assumes roadway data is always entered.
<table>
<thead>
<tr>
<th>Site ID</th>
<th>Sinto Commons</th>
</tr>
</thead>
<tbody>
<tr>
<td>Record Date</td>
<td>3/19/2020</td>
</tr>
<tr>
<td>User's Name</td>
<td>Paul Trautman, Program Manager</td>
</tr>
<tr>
<td>Road #1 Name:</td>
<td>Maxwell</td>
</tr>
<tr>
<td>Road #1</td>
<td></td>
</tr>
<tr>
<td>Vehicle Type</td>
<td>Cars ✓</td>
</tr>
<tr>
<td></td>
<td>Medium Trucks ✓</td>
</tr>
<tr>
<td></td>
<td>Heavy Trucks ✓</td>
</tr>
<tr>
<td>Effective Distance</td>
<td>422</td>
</tr>
<tr>
<td>Distance to Stop Sign</td>
<td></td>
</tr>
<tr>
<td>Average Speed</td>
<td>30</td>
</tr>
<tr>
<td>Average Daily Trips (ADT)</td>
<td>10042</td>
</tr>
<tr>
<td>Night Fraction of ADT</td>
<td>15</td>
</tr>
<tr>
<td>Road Gradient (%)</td>
<td>0</td>
</tr>
<tr>
<td>Vehicle DNL</td>
<td>49.0916</td>
</tr>
<tr>
<td>Calculate Road #1 DNL</td>
<td>51.6183</td>
</tr>
<tr>
<td>Reset</td>
<td></td>
</tr>
<tr>
<td>Road #2 Name:</td>
<td>Boone</td>
</tr>
<tr>
<td>Road #2</td>
<td></td>
</tr>
<tr>
<td>Vehicle Type</td>
<td>Cars ✓</td>
</tr>
<tr>
<td></td>
<td>Medium Trucks ✓</td>
</tr>
<tr>
<td></td>
<td>Heavy Trucks ✓</td>
</tr>
<tr>
<td>Effective Distance</td>
<td>753</td>
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<tr>
<td>--------------------</td>
<td>-----</td>
</tr>
<tr>
<td>Distance to Stop Sign</td>
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</tr>
<tr>
<td>Average Speed</td>
<td>30</td>
</tr>
<tr>
<td>Average Daily Trips (ADT)</td>
<td>10902</td>
</tr>
<tr>
<td>Night Fraction of ADT</td>
<td>15</td>
</tr>
<tr>
<td>Road Gradient (%)</td>
<td></td>
</tr>
<tr>
<td>Vehicle DNL</td>
<td>45.8073</td>
</tr>
<tr>
<td>Calculate Road #2 DNL</td>
<td>48.3245</td>
</tr>
</tbody>
</table>

**Road #3 Name:** Washington

**Road #3**

<table>
<thead>
<tr>
<th>Vehicle Type</th>
<th>Cars</th>
<th>Medium Trucks</th>
<th>Heavy Trucks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effective Distance</td>
<td>492</td>
<td>492</td>
<td>492</td>
</tr>
<tr>
<td>Distance to Stop Sign</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average Speed</td>
<td>30</td>
<td>30</td>
<td>30</td>
</tr>
<tr>
<td>Average Daily Trips (ADT)</td>
<td>17843</td>
<td>366</td>
<td>92</td>
</tr>
<tr>
<td>Night Fraction of ADT</td>
<td>15</td>
<td>15</td>
<td>15</td>
</tr>
<tr>
<td>Road Gradient (%)</td>
<td></td>
<td></td>
<td>0</td>
</tr>
<tr>
<td>Vehicle DNL</td>
<td>50.5883</td>
<td>43.7084</td>
<td>48.0691</td>
</tr>
<tr>
<td>Calculate Road #3 DNL</td>
<td>53.1094</td>
<td></td>
<td>Reset</td>
</tr>
</tbody>
</table>
Mitigation Options

If your site DNL is in Excess of 65 decibels, your options are:

- **No Action Alternative**: Cancel the project at this location
- **Other Reasonable Alternatives**: Choose an alternate site
- **Mitigation**
  - Contact your Field or Regional Environmental Officer (/programs/environmental-review/hud-environmental-staff-contacts/)
  - Increase mitigation in the building walls (only effective if no outdoor, noise sensitive areas)
  - Reconfigure the site plan to increase the distance between the noise source and noise-sensitive uses
  - Incorporate natural or man-made barriers. See *The Noise Guidebook* (/resource/313/hud-noise-guidebook/)
  - Construct noise barrier. See the *Barrier Performance Module* (/programs/environmental-review/bpm-calculator/)

Tools and Guidance

Day/Night Noise Level Assessment Tool User Guide (/resource/3822/day-night-noise-level-
### Auto Noise: 3 Areas within 400 ft

<table>
<thead>
<tr>
<th>Street</th>
<th>Cars/Day</th>
<th>Trucks</th>
<th>Heavy Trucks</th>
<th>Total Vehicles</th>
<th>Distance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maxwell</td>
<td>10,942</td>
<td>206</td>
<td>52</td>
<td>10,300</td>
<td>422'</td>
</tr>
<tr>
<td>Boone</td>
<td>10,920</td>
<td>224</td>
<td>56</td>
<td>11,200</td>
<td>738'</td>
</tr>
<tr>
<td>Washington</td>
<td>17,843</td>
<td>56</td>
<td>92</td>
<td>18,300</td>
<td>492'</td>
</tr>
<tr>
<td>Roadway Type</td>
<td>Autos</td>
<td>Medium Trucks</td>
<td>Heavy Trucks</td>
<td></td>
<td></td>
</tr>
<tr>
<td>------------------</td>
<td>-------</td>
<td>---------------</td>
<td>--------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Minor Arterial</td>
<td>97.5%</td>
<td>2.0%</td>
<td>0.5%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Major Arterial</td>
<td>92.4%</td>
<td>5.1%</td>
<td>2.5%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Freeway</td>
<td>87.3%</td>
<td>7.6%</td>
<td>5.1%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ramps</td>
<td>96.2%</td>
<td>3.0%</td>
<td>0.8%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Vehicle Mix Used in Noise Analysis**

Table 4-8

The effects of local structures acting as noise shields have been included in the model to provide a higher level of detail and accuracy in accordance with FHWA guidelines. Local shielding has a substantial effect on reducing the noise and thus reducing the area of impact. A first row of houses (along the freeway) that provides 40-65 percent shielding reduces noise impacts to the second row of houses by 3 dBA. A first row of houses that provides 65-90 percent shielding reduces noise to second row houses by 5 dBA. Each successive row of houses provides an additional 1.5 dBA of shielding, to a maximum allowable of 10 dBA. In the model, the initial attenuation of 3 dBA was employed to reflect typical conditions in the area.

**Other Possible Sources of Noise**

Rail related activities are a principal but relatively intermittent source of noise in the area. A Burlington Northern Railroad switching yard is located in the area roughly bounded by Francis Avenue, Ferrall Street, Wellesley Avenue, and Market Street. Another Burlington Northern Railroad yard and a Union Pacific Railroad yard are located at the south end of the project near I-90. Burlington Northern Railroad tracks run parallel to the North Option and the Market/Greene corridor approximately between Stoneman Road and Buckeye Avenue.

Felts Field Airport is southeast of the project area between Havana Street and Bowman Road. Spokane International Airport is approximately 13 to 18 kilometers (8 to 11 miles) southwest of the project area. Fairchild Air Force Base is approximately 19 to 24 kilometers (12 to 15 miles) southwest of the project area. Aircraft associated with these facilities routinely fly over the project study area.

**Identification of Land Use, Buildings, and Individuals Affected**

A wide variety of land uses are located adjacent to the proposed freeway alignments, as discussed below.

**Market/Greene Alternative (Preferred Alternative)**

The route from I-90 to First Avenue passes through a single family residential area. The area from First Avenue to Mission Avenue is characterized by industrial firms and other business properties. North of Mission Avenue and south of the Spokane River, the route crosses the Spokane Community College campus. A single family residential neighborhood lies west of Greene Street and the campus. North of the river to Grace Street, both multi and single family residences are adjacent to the alignment. Light industrial, retail, and service uses are located to the west, between the alignment and Market Street. The area north of Grace Street to Empire on the east is single-family residential. On the west from Grace to Empire and north of Empire to Francis Avenue are small businesses, scattered industry, and vacant land.
Nighttime Adjustment.

DNL values are affected by the proportion of traffic volume that occurs during “daytime” (7 a.m. to 10 p.m.) and “nighttime” (10 p.m. to 7 a.m.). The graph on Workchart 1 assumes that 15 percent of the total ADT occurs during nighttime. If a different proportion of the traffic occurs at night, find the appropriate nighttime adjustment factor from Table 5. Record your answer in column 11 of Worksheet C.

Table 5

<table>
<thead>
<tr>
<th>Fraction of ADT</th>
<th>Nighttime Adjustment Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.00</td>
<td>0.43</td>
</tr>
<tr>
<td>0.01</td>
<td>0.46</td>
</tr>
<tr>
<td>0.02</td>
<td>0.50</td>
</tr>
<tr>
<td>0.05</td>
<td>0.62</td>
</tr>
<tr>
<td>0.10</td>
<td>0.64</td>
</tr>
<tr>
<td>0.15</td>
<td>0.68</td>
</tr>
<tr>
<td>0.20</td>
<td>1.00</td>
</tr>
<tr>
<td>0.25</td>
<td>1.19</td>
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<tr>
<td>0.30</td>
<td>1.38</td>
</tr>
<tr>
<td>0.35</td>
<td>1.57</td>
</tr>
<tr>
<td>0.40</td>
<td>1.77</td>
</tr>
<tr>
<td>0.45</td>
<td>1.98</td>
</tr>
<tr>
<td>0.50</td>
<td>2.15</td>
</tr>
<tr>
<td>0.55</td>
<td>2.34</td>
</tr>
</tbody>
</table>

Once you have selected all the appropriate adjustment factors and entered them on page 2 of Worksheet C, multiply all the factors together, then multiply by the automobile ADT (column 12) for 24 hours, found on page 1 of Worksheet C. The resulting adjusted ADT should be entered in column 13. This is the ADT value to be used, in conjunction with the effective distance from the NAL to the road, to find the DNL value from Workchart 1. Enter this DNL value in column 14 of Worksheet C. Remember this is the DNL from automobile (as well as light and medium truck) noise; you must still find the DNL contribution from heavy truck noise in order to obtain the total DNL produced by the roadway you are assessing.

Example 9a: Road No. 3 is a limited access highway with no stop signs and the average speed is 55 mph. Current traffic data indicate an automobile ADT of 40,000 vehicles of which 15 percent occurs during nighttime hours (10 p.m. to 7 a.m.). With an effective distance of 270 feet to NAL No. 2, Workchart 1 is used to show that the DNL for existing automobile traffic is between 63 and 64 dB. Round off to 64 dB.

Example 9b: However, traffic projections estimate that in 10 years the ADT will increase to 100,000 vehicles at an average speed of 55 mph and nighttime usage will increase to 25 percent. For future traffic, you must adjust the future ADT of 100,000 for the effect of increased nighttime use. From Table 5, you find an adjustment factor of 1.38. The adjusted ADT is

\[ 1.38 \times 100,000 = 138,000 \]

and at an effective distance of 270 feet you find from Workchart 1 that the DNL will increase to 69 dB; therefore, provision for extra noise control measures should be explored. We will examine in Example 13 the effect of terrain as a shielding barrier that provides sound attenuation.

Example 10: Road No. 1 on Figure 4 meets the four conditions that allow for an immediate evaluation. The ADT for heavy truck flow is 1200 vehicles. With an effective distance of 339 feet, Workchart 2 shows that the exposure to truck noise from this road is a DNL of 63 dB at NAL No. 1.
<table>
<thead>
<tr>
<th>City</th>
<th>Airport</th>
<th>LocID</th>
<th>Ownership</th>
<th>Hub</th>
<th>Role</th>
<th>Category</th>
<th>Current Year 5</th>
<th>Current Enplaned</th>
<th>Current Based</th>
<th>2019-2023 Dev Estimate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Port Angeles</td>
<td>William R Fairchild International</td>
<td>CLM</td>
<td>PU</td>
<td>Regional</td>
<td>GA</td>
<td>GA</td>
<td>598</td>
<td>44</td>
<td>$7,588,889</td>
<td></td>
</tr>
<tr>
<td>Port Townsend</td>
<td>Jefferson County International</td>
<td>0S9</td>
<td>PU</td>
<td>Local</td>
<td>GA</td>
<td>GA</td>
<td>18</td>
<td>76</td>
<td>$5,226,582</td>
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</tr>
<tr>
<td>Prosser</td>
<td>Prosser</td>
<td>S40</td>
<td>PU</td>
<td>Local</td>
<td>GA</td>
<td>GA</td>
<td>3</td>
<td>52</td>
<td>$1,444,444</td>
<td></td>
</tr>
<tr>
<td>Pullman/Moscow</td>
<td>Pullman/Moscow Regional</td>
<td>PUW</td>
<td>PU N</td>
<td>P</td>
<td>P</td>
<td>61,633</td>
<td>71</td>
<td>$52,654,351</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Puyallup</td>
<td>Pierce County-Thun Field</td>
<td>PLU</td>
<td>PU</td>
<td>Local</td>
<td>GA</td>
<td>GA</td>
<td>0</td>
<td>60</td>
<td>$888,889</td>
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</tr>
<tr>
<td>Quillayute</td>
<td>Quillayute</td>
<td>UIL</td>
<td>PU</td>
<td>Basic</td>
<td>GA</td>
<td>GA</td>
<td>0</td>
<td>0</td>
<td>$1,111,111</td>
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<tr>
<td>Renton</td>
<td>Renton Municipal</td>
<td>RNT</td>
<td>PU Regional</td>
<td>R</td>
<td>R</td>
<td>434</td>
<td>280</td>
<td>$27,777,778</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Richland</td>
<td>Richland</td>
<td>RLD</td>
<td>PU</td>
<td>Regional</td>
<td>GA</td>
<td>GA</td>
<td>0</td>
<td>104</td>
<td>$1,055,555</td>
<td></td>
</tr>
<tr>
<td>Ritzville</td>
<td>Pru Field</td>
<td>33S</td>
<td>PU Unclassified</td>
<td>GA</td>
<td>GA</td>
<td>0</td>
<td>2</td>
<td>$0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rosalia</td>
<td>Rosalia Municipal</td>
<td>72S</td>
<td>PU Unclassified</td>
<td>GA</td>
<td>GA</td>
<td>0</td>
<td>2</td>
<td>$0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Seattle</td>
<td>Boeing Field/ King County International</td>
<td>BFI</td>
<td>PU N</td>
<td>P</td>
<td>P</td>
<td>17,795</td>
<td>381</td>
<td>$15,700,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Seattle</td>
<td>Seattle-Tacoma International</td>
<td>SEA</td>
<td>PU L</td>
<td>P</td>
<td>P</td>
<td>21,887,110</td>
<td>2</td>
<td>$376,690,666</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shelton</td>
<td>Sanderson Field</td>
<td>SHN</td>
<td>PU Local</td>
<td>GA</td>
<td>GA</td>
<td>1</td>
<td>66</td>
<td>$6,396,666</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Snohomish</td>
<td>Harvey Field</td>
<td>S43</td>
<td>PR Regional</td>
<td>R</td>
<td>R</td>
<td>3</td>
<td>265</td>
<td>$0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spokane</td>
<td>Spokane International</td>
<td>GEG</td>
<td>PU S</td>
<td>P</td>
<td>P</td>
<td>1,570,852</td>
<td>58</td>
<td>$29,722,224</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spokane</td>
<td>Felts Field</td>
<td>SFF</td>
<td>PU Regional</td>
<td>R</td>
<td>R</td>
<td>19</td>
<td>173</td>
<td>$2,944,444</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sunnyisle</td>
<td>Sunnyisle Municipal</td>
<td>1S5</td>
<td>PU Basic</td>
<td>GA</td>
<td>GA</td>
<td>0</td>
<td>13</td>
<td>$2,500,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tacoma</td>
<td>Tacoma Narrows</td>
<td>TIW</td>
<td>PU Local</td>
<td>GA</td>
<td>GA</td>
<td>20</td>
<td>64</td>
<td>$8,688,889</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Toledo</td>
<td>Ed Carlson Memorial Field- South Lewis County</td>
<td>TDO</td>
<td>PU Local</td>
<td>GA</td>
<td>GA</td>
<td>0</td>
<td>40</td>
<td>$1,344,444</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vancouver</td>
<td>Pearson Field</td>
<td>VUO</td>
<td>PU Local</td>
<td>GA</td>
<td>GA</td>
<td>3</td>
<td>108</td>
<td>$2,722,222</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vashon</td>
<td>Vashon Municipal</td>
<td>2S1</td>
<td>PU Basic</td>
<td>GA</td>
<td>GA</td>
<td>0</td>
<td>32</td>
<td>$933,333</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Walla Walla</td>
<td>Walla Walla Regional</td>
<td>ALW</td>
<td>PU N</td>
<td>P</td>
<td>P</td>
<td>47,439</td>
<td>101</td>
<td>$5,588,812</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wenatchee</td>
<td>Pangborn Memorial</td>
<td>EAT</td>
<td>PU N</td>
<td>P</td>
<td>P</td>
<td>60,068</td>
<td>108</td>
<td>$13,777,778</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wilbur</td>
<td>Wilbur</td>
<td>2S8</td>
<td>PU Local</td>
<td>GA</td>
<td>GA</td>
<td>0</td>
<td>18</td>
<td>$1,111,111</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Winthrop</td>
<td>Methow Valley State</td>
<td>SS2</td>
<td>PU Basic</td>
<td>GA</td>
<td>GA</td>
<td>9</td>
<td>8</td>
<td>$1,111,111</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yakima</td>
<td>Yakima Air Terminal/ McAllister Field</td>
<td>YKM</td>
<td>PU N</td>
<td>P</td>
<td>P</td>
<td>70,993</td>
<td>139</td>
<td>$7,007,654</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Spokane International - Subject to pilot noise requirements*

*Felts Field - L9,000 enplanements, therefore, not a noise concern and not subject to land usage noise calculation.*

<table>
<thead>
<tr>
<th>Action Required</th>
<th>Further Information</th>
<th>Action Required</th>
<th>Further Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Documentation</td>
<td>Consultation</td>
<td>Source Documentation</td>
<td>Consultation</td>
</tr>
<tr>
<td>Agreed Concepts</td>
<td>(Agreed/Revised/Updated)</td>
<td>Agreed Concepts</td>
<td>(Agreed/Revised/Updated)</td>
</tr>
<tr>
<td>Threshold for Action</td>
<td>Environmental</td>
<td>Threshold for Action</td>
<td>Environmental</td>
</tr>
<tr>
<td>Applicable Activities</td>
<td>Environmental</td>
<td>Applicable Activities</td>
<td>Environmental</td>
</tr>
</tbody>
</table>

AN74714

This is a section of a document.
Toxic Chemicals and Radioactive Materials
24 CFR Part 58

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>All property proposed for use in HUD programs must be free of hazardous materials, contamination, toxic chemicals and gasses and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended utilization of the property.</td>
<td>Comprehensive Environmental Response, Compensation, and Liability Act of 1980 as amended by Superfund Amendments and Reauthorization Act</td>
<td>24 CFR 58.5(i)</td>
</tr>
</tbody>
</table>

You are required to consider all hazards that could affect the health and safety of occupants and use current techniques by qualified professionals to undertake investigations determined necessary. This checklist tool is intended as guidance only and does not cover all possible hazards. This document is subject to change. Legislation and Regulations take precedence over any information found in this document.

1. Is the project for acquisition, new construction or rehabilitation of a one-to-four family residential property?

☐ Yes: PROCEED to #3 to determine the likelihood of hazardous conditions existing nearby or on the property which could affect the health and safety of proposed occupants.
☐ No: PROCEED to #2

2. Is the project for multifamily housing with 5 or more dwelling units (including leasing), or non-residential property?

☐ No: PROCEED to #3

☐ Yes: The environmental review must include the evaluation of previous uses of the site or other evidence of contamination on or near the site, to assure that the occupants of proposed sites are not adversely affected by hazardous materials, contamination, toxic chemicals and gases, and radioactive substances. For acquisition and new construction projects, HUD strongly advises that the review include an ASTM Phase I assessment or equivalent analysis, including an update if the assessment is over 180 days old, in order to meet real estate transaction standards of due diligence. If you do obtain a Phase I review, it is suggested that you include consideration of the regulations at 24 CFR Part 58.5(i) as an additional purpose in the subsection on "purpose" in the Phase I. Your review should cover the information in the questions below (if you have a Phase I it will already cover the information below). PROCEED to #3.

3. Is the answer Yes to any of the following questions?

- Is the property or surrounding neighborhood listed on an EPA Superfund National Priorities, the CERCLA List, or equivalent State list?
  An internet site that may be helpful is www.epa.gov/superfund/sites/npl.

  ☐ No  ☐ Yes

- Is the property located near a toxic or solid-waste landfill site?
  An internet site that may be helpful is http://www.epa.gov/eme/dataldata/em-1ef_home. Maps, site inspections and documentation from the local planning department may also be useful in making your determination.

  ☑ No  ☐ Yes

- Are there any underground storage tanks (not including residential fuel tanks) on or near the property?
  For projects in Washington State, visit: www.ecy.wa.gov/programs/tcp/ust-list/tanks.html.
  For projects in Oregon, visit: http://www.deq.state.or.us/lq/tanks/index.htm
  For projects in Idaho, visit: https://www.deq.idaho.gov/waste-mgmt-remediation/storage-tanks/leaking-underground-storage-tanks.aspx

1 of 2  HUD Seattle Region Environmental Office – 2015
Consider past uses of the property when making your determination.

☐ No  ☐ Yes

- Is the property known or suspected to be contaminated by toxic chemicals or radioactive materials?

☐ No  ☐ Yes

HUD’s “Choosing an Environmentally ‘Safe’ Site” provides guidance in considering potential environmental issues: https://www.onecpd.info/resource/83/choosing-an-environmentally-safe-site/ In considering the site the guidance suggests that you:

- Make a visual inspection of the site for signs of distressed vegetation, vents or fill pipes, storage/oil tanks or questionable containers, ponds or lagoons, stained soil or pavement, pungent, foul or noxious odors, dumped material or soil, mounds of dirt, rubble, fill etc.
- Research the past uses of the site and obtain a disclosure of past uses from the owner. Certain past and present uses such as the following signal concerns of possible contamination and require a more detailed review: gasoline stations, vehicle repair shops, car dealerships, garages, depots, warehouses, commercial printing facilities, industrial or commercial warehouses, dry cleaners, photo developing laboratories, hospitals, junkyard or landfill, waste treatment, storage disposal, processing or recycling facilities, agricultural/farming operations (including hog and poultry operations) and tanneries.
- Identify adjoining properties in the surrounding area for evidence of any facilities as described above.
- Research Federal, State and local records about possible toxins and hazards at the site.

☐ Yes to any of the above questions: PROCEED to #4

☒ No to all questions: The toxic chemicals and radioactive materials review is complete, unless there are other hazards that could affect the health and safety of occupants. Record your determination on the Statutory Worksheet and maintain appropriate documentation in the ERR.

4. Could nearby toxic, hazardous or radioactive substances affect the health and safety of project occupants or conflict with the intended utilization of the property?

Gather all pertinent information concerning any on-site and nearby toxic hazards. Consider, at a minimum, each of the areas identified in Question 3. Consider if your ASTM Phase 1 or equivalent analysis identifies any Recognized Environmental Conditions (RECs) or conditions that could impact the health or safety of the occupants. If appropriate and/or required, obtain independent professional reviews of the site (e.g., an ASTM Phase 2 or equivalent analysis). Contact appropriate Federal, State and Local resources for assistance in assessing exposure to health hazards.

☐ Yes: PROCEED to #5.

☒ No: The toxic chemicals and radioactive materials review is complete, unless there are other hazards that could affect the health and safety of occupants. Record your determination that there are no hazards that could affect the safety of occupants or impact the intended use of the project and maintain appropriate documentation in the ERR.

5. Can the adverse environmental condition be mitigated?

☐ Yes: Mitigate according to the requirements of the appropriate Federal, State or local oversight agency. Record your determination that there are no hazards that could affect the safety of occupants or impact the intended use of the project and maintain appropriate documentation in the ERR. HUD assistance should be conditioned on completion of appropriate mitigation. Deny HUD assistance if, after mitigation, the property is still determined to be unsafe or unhealthy. For more details please refer to HUD’s “Choosing an Environmentally ‘Safe’ Site.”

☒ No: Do not provide HUD assistance for the project at this site.

DISCLAIMER: This document is intended as a tool to help Region X HUD grantees and HUD staff complete environmental requirements. This document is subject to change. This is not a policy statement. Legislation and Regulations take precedence over any information found in this
# SITE-SPECIFIC FIELD CONTAMINATION CHECKLIST

Completing the form requires a site visit by the preparer. The preparer should be sure to observe the property by walking through the property and the building(s) and other structures on the property to the extent possible and observing all adjoining* properties.

**PREPARER MUST COMPLETE CHECKLIST IN ITS ENTIRITY**

<table>
<thead>
<tr>
<th>Date of Visit:</th>
<th>3/16/2020</th>
<th>Time: 4:30 PM</th>
<th>Weather Conditions:</th>
<th>Clear Blue Sky</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program Name:</td>
<td>Home Ministry</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Project Location/Address:</td>
<td>411-509 W. 5th</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property Owner:</td>
<td>Community Enterprises</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Attach the following, as appropriate:
- [ ] Photographs of site and surrounding areas
- [ ] Maps (street, topographic, aerial, site map, etc.)

## QUESTION

Is there evidence of any of the following?

<table>
<thead>
<tr>
<th>QUESTION</th>
<th>SUBJECT PROPERTY</th>
<th>ADJOINING PROPERTIES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is the property or any adjoining property currently used, or has evidence of prior use, as a gasoline station, motor vehicle repair facility, printing facility, dry cleaners, photo developing laboratory, junkyard, or as a waste treatment, storage, disposal, processing or recycling facility?</td>
<td>YES</td>
<td></td>
</tr>
<tr>
<td>Are there any damaged or discarded automobiles, automotive or industrial batteries, pesticides, paints, or other chemicals in individual containers greater than 5 gal in volume or 50 gal in the aggregate, stored on or used at the property or adjoining properties?</td>
<td>NO</td>
<td></td>
</tr>
<tr>
<td>Are there any industrial drums (typically 55 gal) or sacks of chemicals, herbicides or pesticides located on the property or adjoining properties?</td>
<td>YES</td>
<td></td>
</tr>
<tr>
<td>Has fill dirt been brought onto the property or adjoining properties that originated from a suspicious site or that is of an unknown origin?</td>
<td>NO</td>
<td></td>
</tr>
<tr>
<td>Are there any pits, ponds, or lagoons located on the property or adjoining properties in connection with waste treatment or waste disposal?</td>
<td>UNKNOWN</td>
<td></td>
</tr>
<tr>
<td>Is there any stained soil, distressed vegetation and/or discolored water on the property or adjoining properties?</td>
<td>YES</td>
<td></td>
</tr>
<tr>
<td>Are there any storage tanks, aboveground or underground (other than residential), located on the property or adjoining properties?</td>
<td>NO</td>
<td></td>
</tr>
</tbody>
</table>

*Adjoining properties: Any real property or properties the border of which is contiguous or partially contiguous with that of the property, or that would be contiguous or partially contiguous with that of the property but for a street, road, or other public thoroughfare separating them.

DRAFT HUD-R7-5-4-12
### QUESTION

Is there evidence of any of the following?

<table>
<thead>
<tr>
<th>Are there any <strong>vent pipes, fill pipes, or underground tank access ways</strong> visible on the property or adjoining properties?</th>
<th>SUBJECT PROPERTY</th>
<th>ADJOINING PROPERTIES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>YES</strong></td>
<td><strong>NO</strong></td>
<td><strong>UNKNOWN</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Are any flooring, drains, walls, ceilings, or grounds on the property or adjoining properties <strong>stained by substances</strong> (other than water) or emitting <strong>noxious or foul odors or odors of a chemical nature</strong>?</th>
<th>SUBJECT PROPERTY</th>
<th>ADJOINING PROPERTIES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>YES</strong></td>
<td><strong>NO</strong></td>
<td><strong>UNKNOWN</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Is the property served by a <strong>private well or non-public water system</strong>? (If yes, a follow-up investigation is required to determine if contaminants have been identified in the well or system that exceed guidelines applicable to the water system, or if the well has been designated contaminated by any government environmental/health agency.)</th>
<th>SUBJECT PROPERTY</th>
<th>ADJOINING PROPERTIES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>YES</strong></td>
<td><strong>NO</strong></td>
<td><strong>UNKNOWN</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Has the owner or occupant of the property been informed of the existence of past or current <strong>hazardous substances or petroleum products or environmental violations</strong> with respect to the property or adjoining properties?</th>
<th>SUBJECT PROPERTY</th>
<th>ADJOINING PROPERTIES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>YES</strong></td>
<td><strong>NO</strong></td>
<td><strong>UNKNOWN</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Do the property or adjoining properties <strong>discharge wastewater</strong> (not including sanitary waste or storm water) onto the property or adjoining properties and/or into a storm water system?</th>
<th>SUBJECT PROPERTY</th>
<th>ADJOINING PROPERTIES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>YES</strong></td>
<td><strong>NO</strong></td>
<td><strong>UNKNOWN</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Is there a <strong>transformer, capacitor, or any hydraulic equipment</strong> on the property or adjoining properties that are not marked as &quot;non-PCB&quot;?</th>
<th>SUBJECT PROPERTY</th>
<th>ADJOINING PROPERTIES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>YES</strong></td>
<td><strong>NO</strong></td>
<td><strong>UNKNOWN</strong></td>
</tr>
</tbody>
</table>

If answering "YES" or UNKNOWN" to any above items, describe the conditions:

**Evidence of probable and earth or pond site. Likely due to past waste dump or pond. Presence of little concrete foundation and remains. One house still standing - in poor condition.**

Use photographs and maps to mark and identify conditions. Attach more information as needed.

Is further evaluation warranted? **YES** | **NO** | **UNCERTAIN**

---

Preparer of this form must complete the following required information.

<table>
<thead>
<tr>
<th>This inspection was completed by:</th>
<th>Phone Number: 625-6325</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name</strong>: Paul Trimmer</td>
<td><strong>Email</strong>: <a href="mailto:pmtrimmer@cityofcuyahoga.org">pmtrimmer@cityofcuyahoga.org</a></td>
</tr>
<tr>
<td><strong>Title</strong>: Program Manager</td>
<td><strong>Agency</strong>: City of Cuyahoga</td>
</tr>
<tr>
<td><strong>Address</strong>: Cuyahoga City Hall</td>
<td></td>
</tr>
</tbody>
</table>

Preparer represents that to the best of his/her knowledge the above statements and facts are true and correct and to the best of his/her actual knowledge no material facts have been suppressed, omitted or misstated.

**Signature**: [Signature] | **Date**: 8/11/20
Evidence of foundation and earthwork – likely related to 509 W Sinto residence demolition in 2019.

Transformers at south property line – marked Non-PCB

Water shutoff near Sinto ROW
Site looking East

Site looking West

Alley Easement looking East

Utility work adjacent to project site (unrelated to project).

Existing & Occupied House at 441 W Sinto
Hi Paul –

Yes, I can confirm that is **not** associated with Sinto. I spoke with the property owner of the lots east of ours (contact info below) late last week and he let me know they are expanding their office building. Part of their work involves connecting to the sewer main in the alley (see attached plan). I will get out to the site later today and take a look as well.

Jonathan Ferraiuolo, CEO
The Pacific Holding Corporation
427 W. Sinto, Suite 100
jonathan@phcw.com
509-459-4357 or 509-994-2057
www.phcw.com

Mary – I visited the Sinto Commons site yesterday and saw nearby earthwork. It appeared to be swale or utility work. Can you confirm that this work is not funded by Community Frameworks for the Sinto Commons project?

Paul
Explosive and Flammable Operations
24CFR Part 58

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Establish safety standards that can be used as a basis for calculating acceptable separation distances for assisted projects.</td>
<td>Sec.2 Housing and Urban Development Act of 1969 (42 U.S.C. 1441 (a))</td>
<td>24 CFR Part 51 Subpart C</td>
</tr>
</tbody>
</table>

1. Does the project include development, construction, rehabilitation or modernization or conversion?
   (For modernization and rehabilitation projects, does the work increase residential densities, convert a building for habitation, or make a vacant building habitable?)
   ☐ No: STOP here. The project is not subject to 24 CFR Part 51 C. Record your determination in your Environmental Review Record (ERR).
   ☑ Yes: PROCEED to #2

2. Are there aboveground storage tanks within 1 mile of the project site more than 100 gallons in size? Are there plans to install such aboveground storage tanks within 1 mile of the project site? (HUD's stated position is that 24 CFR Part 51 C does not apply to storage tanks ancillary to the operation of the assisted 1-4 family residence, for example the home heating or power source. It does apply to all other tanks, including tanks for neighboring 1-4 family residences.)
   Maintain documentation supporting your determination in your ERR. Documentation could include a finding by a qualified data source (i.e. Fire Marshall etc...), copies of pictures, maps, and/or internet data.
   TIP: You do not have to consider all tanks at all sizes within 1 mile of your project. Screen further by determining the Acceptable Separation Distance for specific tank sizes and using that information to narrow your search. For instance, the maximum ASD for a 100 gallon tank is 115 feet. You do not need to map 100 gallon tanks farther than 115 feet from your project site. Find the list of ASDs by tank size in Appendix C here: https://www.hudexchange.info/resources/documents/Acceptable-Separation-Distance-Guidebook-Appendix-C.pdf
   ☐ No: STOP here. The project is not subject to 24 CFR Part 51 C. Record your determination that there are no storage tanks within one mile of the project site in your ERR.
   ☑ Yes: PROCEED to #3

3. Is the Separation Distance from the project acceptable based on standards in 24 CFR 51 C?
   Use the online tool to calculate ASD: https://www.hudexchange.info/environmental-review/asd-calculator/ or use the HUD guidebook, “Acceptable Separation Distance Guidebook which is available at: https://www.hudexchange.info/resource/2762/acceptable-separation-distance-guidebook/
   ☑ Yes: STOP here. Include maps and your separation distance calculations in your ERR.
   ☐ No: PROCEED to #4

4. With mitigation, can the Separation Distance become acceptable?
   ☐ No: PROJECT IS NOT ACCEPTABLE-DO NOT FUND
   ☑ Yes: STOP here. Maintain documentation supporting your determination in your ERR. Documentation could include a finding by a qualified data source (i.e., Fire Marshall etc.), copies of pictures, maps, technical calculations and information describing the mitigation measures taken.

DISCLAIMER: This document is intended as a tool to help Region X HUD grantees and HUD staff complete environmental requirements. This document is subject to change. This is not a policy statement. Legislation and Regulations take precedence over any information found in this document.
Clear Zones (CZ) and Accident Potential Zones (APZ)
Checklist for HUD or Responsible Entity

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
</table>

1. Does the project include new construction, major rehabilitation, or any other activity which significantly prolongs the physical or economic life of existing facilities?
   □ No: STOP here. The project is not subject to the regulations. Record a description of your project and your determination.
   ☒ Yes: PROCEED to #2

2. Is the Project located within 3000 feet of a civil airport or within 15,000 feet of a military airfield?
   □ The regulations only apply to military and civil primary and commercial service airports. The Federal Aviation Administration updates the list of applicable airports annually:
   http://www.faa.gov/airports_airtraffic/airports/planning_capacity/passenger_allcargo_stats/passenger
   ☒ No: STOP here. The project is not within a Clear Zone (also known as Runway Protection Zone) or Accident Potential Zone. Maintain a list of airports considered and the distance from your project to the covered airport. Record your determination.
   □ Yes: PROCEED to #3

3. Is the Project in the Clear Zone or Accident Potential Zone?
   □ Contact the airport operator and obtain written documentation of the Clear Zone (also known as Runway Protection Zone) and for military airfields, the Accident Potential Zone, and a determination of whether your project is in the APZ or CZ.

   □ No: STOP here. Maintain the written documentation from the airport operator. Identify the location of your project in relation to the clear zone. Record your determination that the project is not in a CZ or APZ.
   □ Yes Project is in an Accident Potential Zone: PROCEED TO #4
   □ Yes Project is in a Clear Zone: PROCEED TO #5

4. For Accident Potential Zones at Military Airfields, does the project change the use of a facility so that it becomes one which is no longer acceptable in accordance with Department of Defense standards (Please see 32 CFR Part 256 for Land Use Compatibility Guidelines for Accident Potential Zones), significantly increase the density or number of people at the site, or introduces explosive, flammable or toxic materials to the area?
   □ No: STOP here. Record your determination that the project fits under the DoD Land Use Compatibility Guidelines. Include any correspondence with the Military Airfield.
   ☒ Yes: The project cannot be assisted with HUD funds. STOP HERE.

5. For Airport Clear Zones, will the project frequently be used or occupied by people?
   □ Yes: The project cannot be assisted with HUD funds. STOP HERE.
   □ No: Obtain written assurance from the airport operator to the effect that there are no plans to purchase the land involved with the project as a portion of a Runway Clear Zone or Clear Zone acquisition program. Maintain copies of all of the documents you have used to make your determination.

DISCLAIMER: This document is intended as a tool to help Region X HUD grantees and HUD staff complete environmental requirements. This document is subject to change. This is not a policy statement. Legislation and Regulations take precedence over any information found in this document.
December 20, 2018

Community Frameworks
907 West Riverside Avenue
Spokane, WA 99201

Attn: Tim Williams, Senior Housing Developer

Subject: Report of Phase I Environmental Site Assessment

Project: Existing ~0.84-Acre Residential Property
Spokane County APNs: 35181-2416, -3201, -3202, -3203 & -3204
Addresses: 441 through 519 W. Sinto Ave., Between N. Washington St. & N. Howard St.
Spokane, Spokane County, Washington

GNN Project No.: 118-897

Mr. Williams:

As requested, GN Northern, Inc. [GNN] has completed this Phase I Environmental Site Assessment [ESA] of the above referenced property (the Property). This report was prepared for your exclusive use. It was prepared to stand as a whole and no part should be excerpted or used in exclusion of any other part.

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental professional as defined in §312.10 of 40 CFR 312.

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject Property. We have developed and performed all the appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Thank you for this opportunity to be of service. If you have any questions regarding this report, or the information contained herein, please contact this office at your convenience.

Respectfully submitted,

GN Northern, Inc.

Karl A. Harmon, LEG, PE
Environmental Professional

Visit our website at www.gnorthern.com
Email: gnnorthern@gnnorthern.com
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Section 1  EXECUTIVE SUMMARY

GN Northern, Inc. (GNN) has prepared this executive summary to provide a general overview of the findings, opinions and conclusions of the Phase I Environmental Site Assessment (ESA) performed at the request of Mr. Tim Williams with Community Frameworks. The Property currently consists of an approximate 0.84-acre site, consisting of five (5) contiguous parcels identified as APNs 35181-2415, -3201, -3202, -3203, & -3204, located along the south side of W. Sinto Avenue between N. Washington Street and N. Howard Street in the City of Spokane, Spokane County, Washington.

The Phase I ESA was performed in accordance with the information provided by Mr. Williams and based on the United States Environmental Protection Agency Final All Appropriate Inquiry Rule (2006) [US EPA AAI]; and, the ASTM Standard E1527-13, Standard Practice for Environmental Site Assessments. The ESA was performed to evaluate the potential for the presence of soil or groundwater contamination that may be present at the Property because of the past use, handling, storage, or disposal of hazardous materials or petroleum products on or near the Property. The report itself should be relied upon for information about the findings, opinions and conclusions.

*This environmental site assessment has not revealed evidence of recognized environmental conditions (RECs) in connection with the subject Property.*

Section 2  INTRODUCTION

2.1  Project Information

This report presents the findings of the Phase I Environmental Site Assessment [ESA] conducted by GN Northern, Inc. [GNN] for the ~0.84-acre subject Property consisting of five (5) contiguous parcels, located along the south side of W. Sinto Avenue between N. Washington Street and N. Howard Street in the City of Spokane, Spokane County, Washington. This assessment was conducted for Community Frameworks in accordance with our proposal. We understand that Community Frameworks intend to purchase the Property and has requested the Phase I ESA for due diligence purposes in conjunction with the planned property transaction and residential development.
2.2 Purpose

The Phase I ESA was performed in accordance with a request from Mr. Tim Williams, Senior Housing Developer with Community Frameworks, and is based on the United States Environmental Protection Agency Final All Appropriate Inquiry Rule (2006) [US EPA AAI]; and, the ASTM Standard E1527-13, Standard Practice for Environmental Site Assessments. As defined in ASTM E1527-13, the Phase I ESA is intended to permit the user to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability (hereinafter, the “landowner liability protections,” or “LLPs”); that is, the practice that constituters all appropriate inquiries into the previous ownership and uses of the property consistent with good commercial and customary practice as defined at 42 U.S.C. 9601(35)(B).

The purpose of the Phase I ESA is to establish Landowner Liability Protection (“LLP”) under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) for user of the ESA.

2.3 Scope of Work

The scope of work for this evaluation is based on the United States Environmental Protection Agency Final All Appropriate Inquiry Rule (2006) [US EPA AAI]; and, the ASTM Standard E1527-13, Standard Practice for Environmental Site Assessments, and consisted of the tasks listed below:

Site Reconnaissance: This involved: (A) a visual reconnaissance of the site, noting physical evidence of potential contamination or possible sources of contamination; (B) interviews/communications with persons familiar with the site (if possible) regarding present and past site usage; and (C) observation of adjacent properties to identify readily observable visual evidence of possible impacts to the subject site. Significant on-site features were photographed to document current conditions. Selected site photographs are presented in Appendix II.

Site History Investigation: The history of the Property was investigated regarding past land use at and near the Property, specifically as it relates to the storage, production, use, or disposal of hazardous materials. The sources of information for this evaluation are
4.6 Surface Water Bodies

No surface water bodies are currently present at the subject site. The nearest significant water body is the Spokane River located approximately 2,000 feet to the south. Current development of the subject site vicinity includes existing municipal stormwater management facilities to channel stormwater for treatment and disposal.

4.7 Geology and Hydrogeology

The subject site is located near the southern edge of the Okanogan Highlands physiographic province along the northeastern margin of the Columbia Basin physiographic province of eastern Washington. The Columbia Basin region is underlain by a sequence of lava flow layers identified as the Miocene Columbia River Basalt Group which emanated from fissures and vents in Oregon, Washington, and Idaho approximately 12 to 26 million years ago. Based on the Geologic Map of the Spokane Northwest 7.5-minute Quadrangle, Spokane County, Washington (Derkey, 2004), the project site is underlain by middle Miocene Grande Ronde Basalt [Mgr]. While the Spokane region was scoured by a series of massive glacial outburst flood event known as the Missoula Floods near the end of the Pleistocene epoch, the subject site generally consists of an elevated basalt rock outcrop free of any significant surficial sediment deposits.

Based on a review of nearby well logs and our knowledge of the area, groundwater in vicinity of the site is estimated to range from approximately 50 to 60 feet BGS. Typically, groundwater levels fluctuate with precipitation, irrigation, drainage, and regional pumping from wells. Groundwater in the site vicinity is generally anticipated to flow at a low gradient toward the west/southwest.

Section 5 REVIEW OF RECORDS & HISTORICAL INFORMATION

Information regarding the history of the Property was obtained from various sources, as listed in the references section of this report. The results of this research are summarized below:

5.1 Aerial Photographs

Selected available historical aerial photos were reviewed to evaluate the history of the site and vicinity, with particular attention to indications of the potential use, storage, or disposal of hazardous materials. Copies of the aerial photographs are presented in Appendix III.
5.9 Title Information
Title documentation for the various portions of the subject site parcels were provided by the User for our review. No indications of apparent environmental concerns were revealed from our review of the available title documents.

5.10 Tribal Records
This site is not within ¼ mile of tribal land, and therefore tribal records for the subject *Property* or adjoining properties were not reviewed.

5.11 Engineering and Institutional Controls
Engineering and Institutional Controls (i.e. deed restrictions and restrictive zoning) were not identified for the subject site by the User or current owner(s) of the *Property*.

5.12 Environmental Cleanup Liens
Recorded Environmental Cleanup Liens [ECL] on a property are indicators that contamination exists or existed at the property. ECLs are “encumbrances on a property for the recovery of incurred cleanup costs on the part of a state, tribal, or federal government agency or other third party” (EPA 2006). No ECLs assigned to the *Property* were identified during our assessment.

5.13 Regulatory Agency File and Records Review
In accordance with Section 8 of ASTM E1527-13, the stated objective or purpose of the required records review is to obtain and review records that will help identify *recognized environmental conditions* in connection with the *Property*. Section 8.2.2.1 further indicates that if the *Property* or any of the adjoining properties is identified on one or more of the standard environmental record sources, pertinent regulatory files and/or records associated with the listings should be reviewed. Since the subject *Property* and surrounding adjacent site are not listed within any of the environmental databases, no such review was warranted.

Section 6 SITE RECONNAISSANCE

6.1 On-Site Observations
GNN personnel visited the *Property* on December 13, 2018 to observe current site conditions and adjacent land use. A summary of pertinent observations and findings is presented below:

- The subject *Property* is currently developed with two existing older single-family residential structures that are believed to have been constructed circa 1905-1910.
1913 allowed connection of the home(s) to the City's municipal sewer. A permit to alter the existing home with the installation of asbestos siding was issued in 1943. Early building permit records were comingled with the lot addressed 437; indicating that they may have historically been joined as a single lot early on.

- **East half of APN 35181.3201 / 501 W. Sinto Ave.** No records related to construction at this lot were found, however the Department of Public Works, Building Division issued a Permit to 'wreck' an existing residence at the site in 1934.

- **West half of APN 35181.3201 / 505 W. Sinto Ave.** No records related to construction at this lot were found, however a *Side Sewer Permit* was issued in 1910 allowing connection to the City's municipal sewer. The Department of Public Works, Building Division issued a Permit in 1930 to 'wreck' an existing residence at the site.

- **APN 35181.3202 / 509 W. Sinto Ave.** Based on a permit to connect the City's water main in 1905, the home at 509 was likely constructed circa 1905. A permit was issued in 1911 to install a water meter in the basement; remarks on the permit indicate that the lot includes '2 houses / 509 & 509/2'. A *Side Sewer Permit* dated in 1910 allowed connection of the 509 address to the City's municipal sewer.

- **APN 35181.3203 / 511 W. Sinto Ave.** Based on permits issued in 1911 to connect to the City's water main and sewer system, the home at 511 was likely constructed circa 1910/1911. A permit was issued in 1913 to install a water meter in the basement. Permits were issued in 1921 and 1937 to construct a new garage and a new shed, respectively. Additionally, permits were issued in 1957/58 for the installation of a 275-gallon Timken tank and gravity oil furnace. The Building Division issued permits in 1969 to demolish a single-family residence on the 511 lot and to erect a fence at 511 & 519 described to be "6' in height - wood & metal, approx. 470' in length".

- **APN 35181.3204 / 519 W. Sinto Ave.** A permit issued in 1910 allowed connection of a home at the lot to the City's sewer system, indicated that the home was constructed in or before 1910. A permit was issued in 1942 to construct a new 2-car garage. The Building Division issued a permit in 1969 to demolish a single-family residence at 519 and, as indicated above, erect a 470' long fence around the lots addressed 511 & 519.
• The home at 441 is currently occupied by a tenant and was not readily available for review of the interior.

• The home at 509 was vacant and an inspection of the interior was completed. The somewhat dilapidated vacant home includes two stories and a full basement.

• The two western parcels (511 & 519) are bordered on the west, north, and east property boundaries by an approximately 6’ tall wall built of welded steel automobile wheels.

• Several old concrete foundations from pre-existing structures were observed in the southern portions of the Property.

• Surface conditions across the undeveloped portions of Property generally included a moderate vegetation cover of grass, brush and weeds.

• Areas littered with miscellaneous trash were noted throughout the site. No indications of unusual odors, stains, or other impacts were noted in association with the miscellaneous dumped materials.

• Evidence of onsite storage or disposal of hazardous materials was not observed or noted on the subject Property during our site reconnaissance.

• No indications of existing or former aboveground storage tanks (ASTs) were observed on the subject Property during our site reconnaissance.

• No indications of existing or former underground storage tanks (USTs) were observed on the subject Property during our site reconnaissance.

• No indications of unusual odors were noted across the subject Property during our site reconnaissance.

• No pools of liquid were observed on the subject Property during our site reconnaissance.

• No drums, barrels, or other unidentified containers were observed on the subject Property during our site reconnaissance.

• No possible sources of polychlorinated biphenyls (PCBs), such as pole mounted transformers were observed on or near to the subject Property during our site reconnaissance.

• No pits were observed on the subject Property during our site reconnaissance.
• No observation of stressed vegetation or stained soils were noted across the subject Property during our site reconnaissance.

6.2 Site Vicinity Observations

Surrounding adjacent and nearby properties include existing commercial developments to the south, a vacant lot and an existing older apartment building to the west, older multi- and single-family residential structures to the north across Sinto Avenue, and a mix of older residential and commercial development to the east.

Section 7 AGENCY DATABASE SEARCH REPORT

Available information regarding sites that generate, store, use, and/or have released hazardous materials was obtained from Environmental Risk Information Services (ERIS), a firm that specializes in this type of information from the agency databases. The publications reviewed in the database search are referenced in the database report presented in Appendix V. The Property radius review was in general accordance with the EPA AAI and ASTM E-1527-05 guidelines as measured from the center of the property. Significant information obtained in the database search is summarized below:

• The subject Property is not listed within any of the State, Federal or Tribal databases.

• A vapor encroachment condition (VEC) is the presence or likely presence of volatile organic compound (VOC) vapors in the subsurface of the subject Property caused by the release of vapors from contaminated soil and/or groundwater either on or near the subject Property. Based on our review and assessment, no such contamination/release was revealed either on or in sufficiently close proximity to the subject Property to indicate any concern related to vapor migration at the subject Property.

• Our evaluation did not identify any sites listed within the database search that appear to pose a threat to the subject site due to the distance, direction, or nature of the issues at those sites (such as registered underground storage tanks or hazardous waste generators with no reported problems).
Section 9 SUMMARY OF FINDINGS AND CONCLUSIONS

This report presents the findings of the Phase I Environmental Site Assessment (ESA) conducted by GN Northern, Inc. [GNN] for the ~0.84-acre subject Property consisting of five contiguous parcels identified as APNs 35181-2415, -3201, -3202, -3203, & -3204, located along the south side of W. Sinto Avenue between N. Washington Street and N. Howard Street in the City of Spokane, Spokane County, Washington.

The purpose of this assessment was to evaluate the potential for the presence of soil or groundwater contamination related to the past use, handling, storage, or disposal of hazardous materials or petroleum products on or near the subject Property. The scope of work for this evaluation included a reconnaissance of the site and vicinity, a review of the history of the site, and a review of information obtained from regulatory agencies regarding the use, storage, generation, or release of hazardous materials on the site or in the site vicinity. Based on this review, GNN presents the following summary and conclusions:

- The subject Property was not identified or listed in the agency database review.
- Other listed sites in the vicinity do not appear to pose a risk to the subject site based on the status of those sites, relative gradient, distance, or direction from the subject site, or the nature of the issue(s) at those sites.
- No significant signs of surface staining or other indications of hazardous waste spills were identified at the subject Property during our site reconnaissance.
- Evidence of the on-site manufacture, or improper storage and disposal, of hazardous materials was not observed or revealed from our research and site assessment.
- This assessment revealed no indication of a possible vapor encroachment condition (VEC) resulting from a contamination/release, on or in sufficiently close proximity to the subject Property, to result in any significant concern related to vapor migration at the subject Property.
- The radon zone for Spokane County is identified as Zone 1 by the USEPA. Zone 1 is described as average indoor screening levels greater than 4 pCi/L. Radon testing and radon mitigation may be warranted for future development at this Property.
- The subject Property has historically been developed with single-family residences and associated structures (garages, sheds, etc.), including two remaining homes. Several pre-existing residential and related structures have historically been demolished and cleared.
Section 8 INTERVIEWS & GENERAL RESEARCH

8.1 "User" of the ESA

The intended “User” of this site assessment, Community Frameworks, represented by Mr. Tim Williams, returned our User Questionnaire with written responses on December 14, 2018 regarding his knowledge of the site. Section 3.1 of this report provides a summary of Mr. Williams’ responses to the User Questionnaire (see also Appendix VI).

8.2 Current Owner(s)/Occupant(s)/Operator(s)

Ownership of the five (5) various parcels that make up the subject Property is divided amongst two current owners. The three (3) eastern parcels, including APNs 35181.2416 (address: 441), 35181.3201 (no current address; formerly 501), and 35181.3202 (formerly 505), are owned by Mr. Dean Lynch. The two (2) western parcels, identified as APNs 35181.3203 (511) and 35181.3204 (519) are currently owned by the estate of J.A. & E. F. Geiger.

Written responses to the Owner questionnaire regarding the three eastern parcels were provided by Mr. Lynch on December 12, 2018. Mr. Lynch indicated that the parcels addressed 441 and 509 and the central vacant lot (former 501 & 505) were all purchased in 1993 from Claude Harrison Collier, and Lawrence J. D’Assissi, Mary Jane Scarpelli, Steven E. D’Assis, Elainin & Joyce Tripp, respectively. According to Mr. Lynch, the parcels were purchased with the intent “to hold for future development”. Mr. Lynch indicated that the selling price reasonably reflects current fair market value. He further indicated that he is unaware of any environmentally related concerns for the subject parcels.

Written responses to the Owner questionnaire regarding the two western parcels were provided by Mr. Daniel Geiger, representing the estate of J.A. & E. F. Geiger, on December 17, 2018. Mr. Geiger indicated that the parcels were purchased by his parents, along with the adjoining properties to the south on Sharp Avenue, in 1977 from David & Velma Dawson. Mr. Geiger indicated that the former property use was residential and that the selling price reasonably reflects current fair market value. He further indicated that he is unaware of any environmentally related concerns for the subject parcels.

8.3 Owner(s)/Occupant(s) of Neighboring Properties

The site is not considered to be abandoned and interviews of owners/occupants of neighboring properties were not conducted.