

April 14, 2026 (updated 04/21/26)

Grove Road LLC  
C/O Todd Whipple & Austin Fuller – Whipple Consulting Engineers, Inc.  
21 S. Pines Rd.  
Spokane Valley WA, 99206

RE: Preliminary “Ash Place Unit Lot Subdivision” Long Plat (Z26-059PPLT)

Dear Todd and Austin:

This letter is to inform you that the application materials for the above-mentioned Preliminary Subdivision were found to be technically incomplete, based on a review required under Spokane Municipal Code (SMC) 17G.061.120, Determination of a Complete Application. The following comments were received from various departments and agencies that require addressing before this application can be considered “technically complete” and proceed to Notice of Application and Public Hearing.

### **REVISIONS REQUIRED**

The following comments need to be addressed prior to the preliminary plat being deemed technically completed.

#### **Engineering, Erik Johnson:**

1. Please rename one of the segments of Toyon Lane to a unique name. 911 mentioned that an intersection of Toyon and Toyon would create confusion and isn't allowed per City of Spokane naming standards.
2. Please revise Note 3, on Sheet PP1 considering right-of-way is not being dedicated as part of this plat.

#### **Planning, Melissa Owen:**

**Prior to deeming the application “technically complete” please address the following:**

3. Please provide individual lot plans showing maximum building footprint, setbacks, and open space associated with each lot. Planning will then conduct a parent parcel evaluation to ensure that requirements under the Unit Lot Subdivision Code related to parent/child parcels are met.
4. If access to vehicles is proposed from the private access tract for any/all lots, please show the proposed setback from the tract and/or pedestrian connection. Please note that if parking is desired between the access tract or pedestrian connection that planning and engineering will request that a minimum of 18' is provided between the tract or pedestrian connection and the garage doors.
5. Please add a parent parcel setback note to the plat map and/or individual lot plans.
6. Please update the proposed density to 16 consistent with 17C.111.210.
7. Please remove details for parcels 25014.4305, 25014.4408, 25014.2210, 25014.2111 and 25014.2101 from the map and adjacent parcel owners' data table as these parcels are across right-of-way and not adjacent to the subject property.
8. Please only show easements on the supplemental easement detail. The overlapping easement information is confusing and includes items that are not easements.
  - a. Please remove agreement AFN 8303100083 from the easement legend and map.
  - b. Please show only location of current anchor associated with easement 8905230018.

- c. Remove AFN 5698648 from the easement legend and map. This is for an LID that has been paid in full per comments from City Treasury.

**Spokane Tribe of Indians, Tribal Historic Preservation Officer:**

Should additional information become available the below assessment/condition of approval from the Spokane Tribe's Tribal Historic Preservation Officer may be revised.

9. Please update the existing cultural resource survey with a TCP (Traditional Cultural Places) study. The study will need to be completed before any ground disturbing activity.

**CONDITIONS OF APPROVAL AND FINAL PLAT DEDICATIONS**

City Staff and Agencies with jurisdiction have provided the followings conditions of approval and required dedication statements for the final plat. Any conditions of approval or dedications noted below will need to be addressed during the final plat process. No changes to the preliminary plat application material are required.

**City of Spokane Engineering, Erik Johnson:**  
**Conditions of Approval.**

- A. The shared nature of the private access, utilities, and stormwater will require the formation of a Homeowner's Association (HOA), or other suitable entity, for maintenance and repair.
  - a. A Stormwater Operation and Maintenance Manual to perpetuate the drainage systems in this Plat must be prepared and referenced in the Dedication and the CC&R's.
  - b. CC&R's for the final plat must be reviewed and approved by Developer Services prior to the City Engineer signing the final binding site plan. We did not receive a copy of the CC&Rs to review with this submittal.
    - i. The CC&Rs shall address operation, maintenance, repair, and replacement of the private sewer, water, access, and stormwater facilities. Sinking fund calculations shall be included for the operation, maintenance, and replacement of these facilities.
  - c. The following language shall be added to the face of the final Plat:
    - i. The \_\_\_\_\_ Homeowners Association was created by a document filed on the \_\_\_ day of \_\_\_\_\_, 2026 under Secretary of State U.B.I. Number \_\_\_\_\_.
- B. Addresses must be shown on the face of the final plat. Please contact The City of Spokane Addressing team at [addressing@spokanecity.org](mailto:addressing@spokanecity.org) to develop addresses prior to submitting the final plat.
- C. Any unused existing curb cuts shall be removed and replace with city standard curb and sidewalk prior to finalizing the final plat.
- D. All easements whether existing or proposed, must be shown on the face of the final plat. If blanket in nature, please reference the easement in a Surveyor's Note.
- E. Lot plans, stamped and signed by a Professional Engineer, shall be prepared for residential lots as per the criteria listed in Appendix 3C of the Spokane Regional Stormwater Manual and submitted to the City of Spokane for review and acceptance prior to the final plat. Please prepare these and submit to Engineering.
- F. Construction plans for access, sewer, water and storm water systems must be designed by a Professional Engineer, licensed in the State of Washington, and submitted to the Development Services Center for review and acceptance prior to construction.

- G. Plan review fees for sanitary sewer, water, access, and storm water improvements will be determined at the time of plan submittal and must be paid prior to the start of review.
- H. In accordance with the City's Financial Guarantee Policy, a financial guarantee will be required for all access, drainage, and erosion / sediment control improvements not constructed prior to approval of the final plat. Sewer and water improvements necessary to serve the plat cannot be bonded for.

#### Water Comments

- I. There is an existing 6" ductile iron water main in Ash Place that may be able to provide this development with adequate water.
  - a. A master meter will be required for this development as proposed. The master meter vault shall be located within three feet of the property line adjacent to North Ash Place. A water service connection is required to serve each lot.
  - b. An overall water plan and hydraulic analysis must be submitted to the Development Services Center for review and acceptance. The hydraulic analysis must include supporting calculations for domestic and fire flows.
  - c. The developer will be responsible for all costs associated with design and construction of water improvements necessary to serve the proposed plat.
  - d. The water system shall be designed and constructed in accordance with City standards. A pressure of 45 psi minimum at the property line is required for service connections supplying domestic flows. Pressures shall not drop below 20 psi at any point in the system during a fire situation. Pressures over 80 psi will require that pressure relief valves be installed at developer expense.
  - e. In addition to the hydraulic analysis, construction plans shall be submitted to the Development Services Center for review and acceptance. The water system, including individual service connections to each lot, shall be constructed and accepted for service prior to the City Engineer signing the final plat.

#### Sewer Comments

- J. There is an existing 8" PVC sewer main in Ash Place that may be able to provide sewer service to this project.
  - a. The sanitary system serving this development, as proposed, shall be a private system. A minimum six-inch diameter PVC sewer connection is required for connection to the public main. A minimum six-inch diameter PVC connection is required when providing service to three or more dwelling units. A minimum four-inch diameter PVC side sewer can serve up to a maximum of two dwelling units on the same lot. Each lot shall have its own service connection.
  - b. The developer will be responsible for all costs associated with design and construction of sanitary sewer improvements necessary to serve the proposed plat.
  - c. The sanitary sewer system shall be designed and constructed in accordance with City standards.
  - d. Construction plans shall be submitted to the Development Services Center for review and acceptance. The sanitary sewer system, including individual service connections to each lot, shall be constructed and accepted for service prior to the City Engineer signing the final plat.

#### Stormwater Comments

- K. A Final Drainage Report and plan will be required to be submitted prior to final plat. The final drainage report should be verified for consistency of the method of stormwater treatment and disposal (e.g. detention/retention/bioswale/gravel gallery are all mentioned for proposed solutions).

- L. All stormwater and surface drainage generated on-site shall be disposed of on-site in accordance with SMC 17D.060 "Stormwater Facilities", the Regional Stormwater Manual, Special Drainage Districts, City Design Standards, and, per the Project Engineer's recommendations, based on the drainage plan accepted for the final plat. Pre-development flow of any off-site runoff passing through the plat shall not be increased (rate or volume) or concentrated due to development of the plat, based on a 50-year design storm. An escape route for a 100-year design storm must be provided.
  - a. If proposing to discharge offsite, a Design Standards Variance will be required to be approved prior to accepting civil plans.
  - b. Due to the shallow bedrock in the area, Underground Injection Control (UIC) registration may be a challenge to achieve. In accordance with State Law, existing and proposed Underground Injection Control structures need to be registered with the Washington State Department of Ecology. Proof of registration must be provided prior to plan acceptance.
  - c. Prior to final plat, a final drainage report and plan shall be submitted to the Development Services Center for review and acceptance.
  - d. An erosion / sediment control plan, detailing how dust and runoff will be handled during and after construction, shall be submitted to the Development Services Center for review and acceptance prior to construction.

#### Access Comments

- M. Section 17G.080.065(9) of the Spokane Municipal Code states that driveways providing vehicle access to lots shall not serve more than (9) lots in a Unit Lot Subdivision unless approved by the City Engineer. The proposed Ash Place Plat has twenty (20) lots. Since this plat will be served by a roadway that meets Fire Department regulations, it is recommended that a private access in lieu of a driveway be constructed for this purpose. The distinction between a driveway and private access is the private access will be designed to meet Fire Department access requirements, including but not limited to roadway cross-section, width, turning radius, parking, and turnaround requirements.

#### **Statements to be included in the Dedicatory Language:**

- I. Ten-foot utility and drainage easements as shown here on the described plat are hereby dedicated to the City and its permittees for the construction, reconstruction, maintenance, protection, inspections and operation of their respective facilities together with the right to prohibit structures that may interfere with the construction, reconstruction, reliability and safe operation of the same.
- II. Development of the subject property, including grading and filling, are required to follow an erosion/sediment control plan that has been submitted to and accepted by the Development Services Center prior to the issuance of any building and/or grading permits.
- III. Prior to the issuance of any building permits, the lots shall be connected to a functioning public or private water system complying with the requirements of the Development Services Center and having adequate pressure for domestic and fire uses, as determined by the Water and Hydroelectric Services Department and the Fire Department.
- IV. The water system shall be designed and constructed in accordance with City Standards. A pressure of 45 psi minimum at the property line is required for service connections supplying domestic flows. Pressures shall not drop below 20 psi at any point in the system during a fire situation. Pressures over 80 psi will require that pressure relief valves be installed at the developer's expense.
- V. All stormwater and surface drainage generated on-site shall be disposed of on-site in accordance with SMC 17D.060 "Storm water Facilities", the Regional Stormwater Manual, Special Drainage Districts, City Design Standards, and, per the Project

Engineer's recommendations, based on the drainage plan accepted for the final plat. Pre-development flow of off-site runoff passing through the plat shall not be increased (rate or volume) or concentrated due to development of the plat, based on a 50-year design storm. An escape route for a 100-year design storm shall be provided.

- VI. No building permit shall be issued for any lot in this plat until evidence satisfactory to the City Engineer has been provided showing that the recommendations of SMC 17.060 "Stormwater Facilities", the Regional Stormwater Manual, Special Drainage Districts, City Design Standards, and the Project Engineer's recommendations, based on the drainage plan accepted for this final plat, have been complied with. A surface drainage plan shall be prepared for each lot and shall be submitted to Developer Services for review and acceptance prior to issuance of a building permit.
- VII. Slope easements for cut and fill, as deemed necessary by the Development Services Center in accordance with City Design Standards, are granted along all public right of ways.
- VIII. Only City water and sanitary sewer systems shall serve the plat; The use of individual on-site sanitary waste disposal systems and private wells is prohibited.
- IX. All public / private improvements (access, sewer, storm sewer, and water) shall be constructed to City standards prior to the occupancy of any structures served by said improvements.
- X. No building permit shall be issued for any lot in the plat until evidence satisfactory to the City Engineer has been provided showing that sanitary sewer and water improvements, constructed to City standards, have been provided to the lot in question.

### **City of Spokane Planning,**

#### **Conditions of Approval**

- N. Unit Lot Subdivision requirements (17G.080.065).
  - a. Portions of the parent site designated for common use shall be identified as Tracts or other common space and owned in common by the owners of the child lots or a larger collective organization. For example, a homeowners association comprised of the owners of the child lots located within the parent site. This requirement shall be included in deed restrictions as required in subsection (F) of 17G.080.065.
  - b. The legal description of each lot shall identify it as part of a unit lot subdivision.
  - c. Individual lot plans will be recorded with the final plat.
- O. Spokane Geologically Hazardous Areas (17E.040).
  - a. Recommendations from the Geotechnical Report prepared by Budinger & Associates and compliance with the City's Geologically Hazardous Areas Code (17E.040) will continue to be evaluated throughout the final plat and construction-related permit processes.
  - b. General performance standards of section 17E.040.100 must be met for all development within geologically hazardous areas.
  - c. Final subdivisions located within geologically hazardous areas shall contain language in the plat dedication to indicate lots or portions of lots that are affected by geologic hazards. In addition, building setback lines may be drawn on lots, parcels and tracts to indicate suitable areas for construction of structures or improvements.
  - d. Silt-clay interbeds are anticipated to be present near the level of Ash Street and would tend to control slope stability per the Budinger & Associates Geotechnical Conditions Report (GCR). Consistent with the Budinger & Associates GCR, drilled borings will be required to determine slope stability and any mitigation measures that may be needed prior to any ground disturbing activities and final plat approval.
  - e. The Geotechnical Conditions Report (GCR) is identified by Budinger and Associates as suitable for conceptual and preliminary design and includes multiple preliminary

recommendations; however, the report also states that additional geotechnical services are needed to complete a geotechnical engineering report once design-level information is available.

- P. If retaining walls will be required for development of this site, retaining walls should be included for review at time of engineering plan submittal.
- Q. New separated sidewalk is required along N. Ash Place. A minimum 5' wide planting strip and between the curb and sidewalk is required with a 5' wide sidewalk. Trees may also be in well if you desire to retain existing sidewalk areas instead of vegetated plant strips.
  - a. We recommend that the final plat application materials (including street tree plan) be submitted at the same time as the engineering plan submittals to ensure coordination and consistency with the conditions of approval for this plat.
- R. Street trees and landscaping are required.
  - a. Street trees can be installed at time of building permit associated with each lot fronting N. Ash Place. Installation will be reviewed at time of CO for each new residential unit.
  - b. There are two street trees indicated on GIS Maps in front of parcel 25014.4702. Please address the plan for these two existing street trees at time of street tree plans submittal (removal and replacement, protection in place, etc.).
  - f. Please coordinate with Urban Forestry regarding street trees associated with N. Ash Street.
- S. An HOA will be required to own and maintain all tracts including, but not limited to those for stormwater and access. Please see dedications section for HOA specific dedication language.
- T. Given the proposed layout of vehicular access that dead ends at shared lot lines to the north and south, planning recommends as a condition of approval the installation of 6' tall sight obscuring fencing or L1 landscape to screen vehicular lights from neighboring properties.
- U. Pedestrian Connectivity (17C.111.340). Driveways are permitted to serve as pedestrian access for up to nine units unless otherwise approved by City Engineering. To address pedestrian connectivity requirements under 17C.111.340 as well as concurrency standards for sidewalks, pathways, and other features that assure safe walking conditions under 17G.080.025, planning recommends, as a condition of approval, that:
  - a. Pedestrian access to lots 1-10 block 3 be distinct from the proposed private vehicle access via a change in color, texture, etc.
  - b. All other units fronting onto Ash Place (lots 1-3 block 1 and lots 1-7 block 2) will have their own separate walking connections from street facing entry of each unit to the public sidewalk at Ash Place.

**Dedications to be included on the final plat.**

- XI. If any archaeological resources, including sites, objects, structures, artifacts, and/or implements, are discovered on the project site, all construction and/or site disturbing activities shall cease until appropriate authorities, agencies, and/or entities have been notified in accordance with Chapters 27.44 and 27.53 RCW.
- XII. Street trees and landscaping are required – compliance will be verified prior to approval of Certificate of Occupancy for each new home.
- XIII. Add the following dedication to the face of the final plat. Please include HOA UBI, CCR recording no, etc.
  - a. "THE OWNERS OF ALL LOTS WITHIN THIS PLAT SHALL BE MEMBERS OF THE \_\_\_\_\_ ASSOCIATION, A WASHINGTON CORPORATION CREATED ON \_\_\_\_\_, UBI NUMBER \_\_\_\_\_ SUBJECT TO THE ARTICLES AND BYLAWS

THEREOF. PER DECLARATION ESTABLISHING COVENANTS,  
CONDITIONS, AND RESTRICTIONS UNDER AUDITOR'S FILE NUMBER  
\_\_\_\_\_.”

- XIV. Per 17G.080.065(F) Unit Lot Subdivision Recording. The plat recorded with the county auditor's office shall include the following:
- b. Access easements, joint use and maintenance agreements, and covenants, conditions, and restrictions identifying the rights and responsibilities of property owners and/or the homeowners association for use and maintenance of common garage, parking and vehicle access areas; on-site recreation; landscaping; utilities; common open space; exterior building facades and roofs; and other similar features.
  - c. A note that approval of the subdivision was granted by the review of the site as a whole (stating the subject project file number if applicable);
  - d. A note that subsequent platting actions, additions or modifications to the structure(s) may not create or increase any nonconformity of the parent site as a whole, and shall conform to the approved site development plan;
  - e. A note stating that if a structure or portion of a structure has been damaged or destroyed, any repair, reconstruction or replacement of the structure(s) shall conform to the approved site development plan;
  - f. A note that additional development of the individual lots may be limited as a result of the application of development standards to the parent site.
  - g. The legal description of each lot shall identify it as part of a unit lot subdivision.

**Signatory Statements to be included on the final plat.**

- XV. The final plat shall include the signatory statements as prescribed in [SMC 17G.080.040\(G\)\(2\)](#) including the Surveyor's Certificate, City Treasurer, City Planning Director, City Engineer, Spokane County Treasurer, Spokane County Auditor, and the following:

- a. The certification of the hearing examiner, on behalf of the city council, as follows:

“This plat has been reviewed on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_ and is found to be in full compliance with all the conditions of approval stipulated in the Hearing Examiner's approval of preliminary plat # -PP/PUD.

\_\_\_\_\_  
Hearing Examiner”

- b. Signature of every owner certifying that:
- i. the plat is made with the free consent and in accordance with the desires of the owners of the land;
  - ii. the owners are the owners of the property and the only parties having interest in the land and is not encumbered by any delinquent taxes or assessments;
  - iii. the owners adopt the plan of lots, blocks and streets shown;
  - iv. owner dedicates to the City and the City's permittees the easements shown for utilities and cable television purposes;

**City of Spokane Fire Protection Engineer, Justin Cravalho:**

**Conditions of Approval (Modified from Z23-587PPLT per email 04/03/26).**

- V. The internal driveway will be required to be constructed for fire access. They will need to meet the minimum requirements of the Fire Code including a minimum 20' clear width and 50' external and 28' internal turning radii.

- W. "Fire Lane – No Parking" signage is required on both sides of the private internal access every 150'.
- X. Private Access (Toyon Lane, Tract 1) and water supply (internal fire hydrants) shall be provided and approved prior to delivery of combustible construction materials to the site. Temporary internal access will not be allowed to obtain the permits.

**City of Spokane Waste Management:**

No comments were received for this project application. Planning has retained the original conditions of approval from Waste Water Management.

**Conditions of Approval (retained from Z23-587PPLT)**

- Y. Carts will need to be stored in private garages.
- Z. The internal driveway must be built to hold the weight of solid waste collection trucks.
- AA. The internal driveway access will need to be maintained cleared of ice and snow.

**City of Spokane Integrated Capital Management, Inga Note (transportation):**

**Condition of Approval (retained from Z23-587PPLT).**

BB. No vehicle access to serve the proposed lots will be allowed to Ash Street. This prohibition will be included as a dedication on the face of the plat.

**City of Spokane Historic Preservation Office:**

No new comment received at this time. Original conditions of approval from the City/County Historic Preservation Officer retained. City/County Historic Preservation Office may have additional comments following compliance with the enclosed request from Spokane Tribe's Tribal Historic Preservation Officer.

**Condition of Approval (retained from Z23-587PPLT).**

CC. An Inadvertent Discover Plan implemented into scope of work. This condition will need to be met prior to any ground disturbing activities.

**City of Spokane Parks Department:**

**Conditions of Approval.**

DD. This project is in close proximity to the existing 'Drumheller Springs Park' (APN 25014.2210 & 25014.3135), which is a designated 'natural land' park facility within the city's park system intended to be preserved in a natural, undeveloped state. Due to the close proximity of the park land to the proposed project, and the public's desire to protect the natural condition of the park, Spokane Parks recommends the developer take measures to ensure no construction activity, associated utility construction, construction parking, or other activity associated with the proposed development impact the public park land, and its contiguous right-of-way / frontage in any way.

**Avista:**

**Conditions of Approval.**

- EE. On the final subdivision map include the following:
  - a. Provide a 10-foot utility easement along N. Ash Place.
  - b. On Lot 3, Block 1 provide a 5-foot easement centered and surrounding existing down guy and anchor coming from pole (No. 497976) located on east side of N. Ash Place, adjacent to subject parcel.
  - c. Provide a 10-foot utility easement along the east property line of Lots 1-3, Block 1 and Lots 1-7, Block 2, adjacent to Toyon Lane.
  - d. Provide a 10-foot utility easement along the west side of Lots 1-10, Block 3, Tract A and Tract D, adjacent to Toyon Lane.

**Please include the following in the dedication language** (to be addressed with final plat).

- XVI. Utility easements shown hereon the described plat are hereby dedicated to the City and serving utility providers for the construction, reconstruction, maintenance and operation of utilities and cable television, together with the right to inspect said utilities and to trim and/or remove brush and trees which may interfere with the construction, maintenance and operation of same.
- XVII. A 10-foot easement for utilities, including cable television, is hereby granted along all street frontages to the City and serving utility providers.
- XVIII. Avista shall have the right to prohibit changes in grade to above and below installed facilities within the utility easements as granted herein.
- XIX. No building, structure, fence or landscaping is allowed within the easements as granted herein that may interfere with Avista's rights or with the safe operation of the Facilities or that are not in compliance with all safety and building codes, regulations and laws.
- XX. If the developer or their subcontractor ditches beyond the limits of the as-platted easement strips as granted herein, additional easements will need to be acquired to cover the utility lying outside of the easement area.
- XXI. The private access tract (Tract 1) as shown hereon is dedicated for utility purposes in addition to ingress and egress as stated.

**WA Dept. of Archeology and Historic Preservation (DAHP):**  
**Condition of Approval.**

FF. An Inadvertent Discover Plan implemented into scope of work. This condition will need to be met prior to any ground disturbing activities.

**GENERAL / OTHER**

The following comments are general in nature. No modification to the application material is required.

**City of Spokane Planning Department.**

- a. Final plat map requirements are found in 17G.080.050. The final plat procedures are the same in form as the short plat review procedures as provided in 17G.080.040.
- b. No phasing final plat phasing is proposed. A preliminary plat that has received preliminary approval may be subsequently modified to be developed in phases, subject to approval of the director consistent with 17G.080.050(F) – Phasing.
- c. There are no minimum parking requirements pursuant to [Section 17C.230.110](#) Minimum Required Parking Spaces and Table 17C.230.020-1.

**City of Spokane Building Department:**

No comments were received for this project application. Planning has retained the original comments from Building associated with the 23' project permit.

**General Comments (retained from Z23-587PPLT).**

- d. Since these will be reviewed under IRC code, Sec. R403.1.7 would apply for setbacks to slopes greater than 33%. If compliance with this cannot be attained by placing the structures an accordance with the setbacks as per this section, then Geotech/Engineering will be required. Lots 5-11 are of particular concern, but other lots may also be included in this depending on the size and location of the proposed structures.
- e. In other developments a Geotech report has been done for the entire plat with recommendations. Since our understanding is that these will more than likely be attached units, it would be helpful for Building approval on permits to have this Geotech report

provided at permit submittal, and the foundations be designed by an engineer incorporating the recommendations/requirements of the Geotech report.

- f. Also in other developments, retaining walls have been constructed to mitigate the adjacent steep slopes. Such retaining walls would need to be engineered and permitted separately. A Geotech/engineers report indicating the setbacks to the retaining wall for structures would then suffice to meet the code requirement (as per R403.1.7.4)

**City of Spokane Treasury:**

No LIDS impact development of this property per City Treasury review by Cara Geiger (email confirmation on -3/20/26)

**Spokane Regional Clean Air Agency**

Please see enclosed letter dated 03/23/26 providing standard information and requirements for construction, etc.

**Fairchild Airforce Base**

Please see email dated 03/23/26 indicating that residential lots in the project location are compatible with FAFB overlay zones.

**WA Dept of Ecology Shorelines and Environmental Assistance (SEA) program**

Several communications from were received and include correspondence from Ryan McNair and Jeremy Sykes. Please note that the April 4, 2026, site visit by Larry Dawes and communication regarding the site visit satisfied ecologies request to verify that no vernal pools were located on the project site. Please see enclosed communications associated with wetlands.

**Audubon Downriver NC and Public Comments received during the agency review period.**

Please see attached email and resolution from the Audubon Downriver Neighborhood Council regarding their objection to the proposed project that reflects community concern about the project's potential impacts. The enclosed also includes public comments from interested parties received during the public comment period through the date of this letter.

Considering the need for additional information, the timeline for this application is on hold until the additional information is provided. In accordance with SMC 17G.061.120, the required information must be provided within sixty days from the notification by the department. The applicant may submit a written request for additional time to the director, any time extensions shall be in writing. If the information is not received within 60 days, the application and a portion of the fees shall be returned to the applicant in accordance with SMC 08.02.0692.

If you have any questions regarding the requirements or conditions included in this letter, feel free to contact me by email or phone.

Sincerely,



Melissa Owen  
Senior Planner  
Development Services Center

**Enclosures (below list ordered as per inclusion in the comment package):**

Engineering (memo dated 04/13/26)

Planning (comments incorporated into this letter)

Randy Abrahamson, Spokane Indians Tribal Historic Preservation Officer (letter dated 03/31/26 and follow-up communications from M. Owen on 04/02/26)

Justin Cravalho, City of Spokane Fire Protection Engineer (email dated 04/03/26)

Inga Note, City of Spokane Integrated Capital Management (email dated 03/30/26)

Nick Hamad, City of Spokane Parks (email 04/02/26)

Karen Kendall, Avista Real Estate Rep. (email dated 04/01/26)

James McNaughton, WA Dept of Archeology and Historic Preservation (letter dated 03/26/26)

Cara Geiger, City of Spokane Taxes and Licenses (email dated 03/20/26)

Spokane Regional Clean Air Agency (letter dated 03/23/26)

Kyle D. Krupansky, 1<sup>st</sup> Lt, Fairchild Airforce Base (email dated 03/23/26)

Jeremy Sykes and Ryan McNair, WA Dept. of Ecology Shorelines and Environmental Assistance (SEA) program (multiple dates)

Applicant Response, correspondence from Larry Dawes, Water, Biology, Soil & Water re: project site wetland site visit (emails 04/04/26 and 09/09/24, and 2025 letter)

Audubon Downriver NC Email (04/01/26) and Resolution

Public Comments received during initial agency review period.

- Anne Marie Liebhaber
- Becca Lynn
- Brooke EV Nelson
- Conni Ellern
- Daiel Hosler
- Darla Greene Harryman
- Dennis Flynn
- Heidi Montez
- Helen Goertz
- Isaac Harmson
- Jamie E
- Janice Baker
- Jerry Bentley
- Jess Asien
- Joseph Shields
- K Wardell
- Kai
- Katie Leonardich
- Kristen Angell
- Lindsey Jennings
- Lisa Waddle
- Lydia Duffy
- Marlene Torrison

- Marnie Solheim
- Nancy Huck
- Nicole Brianna
- Nola Hansen
- RJ Nelson
- Russ Torrison
- Shaylee Ton
- Sheri Lattimore
- Stefani VanDeest
- Susan Goertz
- Tammi Ray
- Victor Frazier
- E.G. Torrison

# MEMORANDUM



**DATE:** April 13, 2026  
**TO:** Melissa Owen, Planner  
**FROM:** Erik Johnson, Engineering Technician IV  
**THROUGH:** Eldon Brown, P.E., City Engineer, Principal Engineer  
**FILE NO:** Z26-059PPLT  
**SUBJECT:** Ash Place Preliminary Long Plat

## Comments to be addressed prior to Preliminary Plat technical completion

1. Please rename one of the segments of Toyon Lane to a unique name. 911 mentioned that an intersection of Toyon and Toyon would create confusion and isn't allowed per City of Spokane naming standards.
2. Please revise Note 3, on Sheet PP1 considering right-of-way is not being dedicated as part of this plat.

## Other Comments

1. The shared nature of the private access, utilities, and stormwater will require the formation of a Homeowner's Association (HOA), or other suitable entity, for maintenance and repair.
  - a. A Stormwater Operation and Maintenance Manual to perpetuate the drainage systems in this Plat must be prepared and referenced in the Dedication and the CC&R's.
  - b. CC&R's for the final plat must be reviewed and approved by Developer Services prior to the City Engineer signing the final binding site plan. We did not receive a copy of the CC&Rs to review with this submittal.
    - i. The CC&Rs shall address operation, maintenance, repair, and replacement of the private sewer, water, access, and stormwater facilities. Sinking fund calculations shall be included for the operation, maintenance, and replacement of these facilities.
  - c. The following language shall be added to the face of the final Plat:
    - i. The \_\_\_\_\_ Home Owners Association was created by a document filed on the \_\_ day of \_\_\_\_, 2026 under Secretary of State U.B.I. Number \_\_\_\_\_.
2. Addresses must be shown on the face of the final plat. Please contact The City of Spokane Addressing team at [addressing@spokanecity.org](mailto:addressing@spokanecity.org) to develop addresses prior to submitting the final plat.
3. Any unused existing curb cuts shall be removed and replace with city standard curb and sidewalk prior to finalizing the final plat.

**Date:** April 13, 2026

**Comments:** Ash Place Preliminary Long Plat (Continuation)

4. All easements whether existing or proposed, must be shown on the face of the final plat. If blanket in nature, please reference the easement in a Surveyor's Note.
5. Lot plans, stamped and signed by a Professional Engineer, shall be prepared for residential lots as per the criteria listed in Appendix 3C of the Spokane Regional Stormwater Manual and submitted to the City of Spokane for review and acceptance prior to the final plat. Please prepare these and submit to Engineering.
6. Construction plans for access, sewer, water and storm water systems must be designed by a Professional Engineer, licensed in the State of Washington, and submitted to the Development Services Center for review and acceptance prior to construction.
7. Plan review fees for sanitary sewer, water, access, and storm water improvements will be determined at the time of plan submittal and must be paid prior to the start of review.
8. In accordance with the City's Financial Guarantee Policy, a financial guarantee will be required for all access, drainage, and erosion / sediment control improvements not constructed prior to approval of the final plat. Sewer and water improvements necessary to serve the plat cannot be bonded for.

#### **Water Comments**

9. There is an existing 6" ductile iron water main in Ash Place that may be able to provide this development with adequate water.
  - a. A master meter will be required for this development as proposed. The master meter vault shall be located within three feet of the property line adjacent to North Ash Place. A water service connection is required to serve each lot.
  - b. An overall water plan and hydraulic analysis must be submitted to the Development Services Center for review and acceptance. The hydraulic analysis must include supporting calculations for domestic and fire flows.
  - c. The developer will be responsible for all costs associated with design and construction of water improvements necessary to serve the proposed plat.
  - d. The water system shall be designed and constructed in accordance with City standards. A pressure of 45 psi minimum at the property line is required for service connections supplying domestic flows. Pressures shall not drop below 20 psi at any point in the system during a fire situation. Pressures over 80 psi will require that pressure relief valves be installed at developer expense.
  - e. In addition to the hydraulic analysis, construction plans shall be submitted to the Development Services Center for review and acceptance. The water system, including individual service connections to each lot, shall be constructed and accepted for service prior to the City Engineer signing the final plat.

#### **Sewer Comments**

10. There is an existing 8" PVC sewer main in Ash Place that may be able to provide sewer service to this project.

**Date:** April 13, 2026

**Comments:** Ash Place Preliminary Long Plat

(Continuation)

- a. The sanitary system serving this development, as proposed, shall be a private system. A minimum six-inch diameter PVC sewer connection is required for connection to the public main. A minimum six-inch diameter PVC connection is required when providing service to three or more dwelling units. A minimum four-inch diameter PVC side sewer can serve up to a maximum of two dwelling units on the same lot. Each lot shall have its own service connection.
- b. The developer will be responsible for all costs associated with design and construction of sanitary sewer improvements necessary to serve the proposed plat.
- c. The sanitary sewer system shall be designed and constructed in accordance with City standards.
- d. Construction plans shall be submitted to the Development Services Center for review and acceptance. The sanitary sewer system, including individual service connections to each lot, shall be constructed and accepted for service prior to the City Engineer signing the final plat.

**Stormwater Comments**

11. A Final Drainage Report and plan will be required to be submitted prior to final plat. The final drainage report should be verified for consistency of the method of stormwater treatment and disposal (e.g. detention/retention/bioswale/gravel gallery are all mentioned for proposed solutions).
12. All stormwater and surface drainage generated on-site shall be disposed of on-site in accordance with SMC 17D.060 "Stormwater Facilities", the Regional Stormwater Manual, Special Drainage Districts, City Design Standards, and, per the Project Engineer's recommendations, based on the drainage plan accepted for the final plat. Pre-development flow of any off-site runoff passing through the plat shall not be increased (rate or volume) or concentrated due to development of the plat, based on a 50-year design storm. An escape route for a 100-year design storm must be provided.
  - a. If proposing to discharge offsite, a Design Standards Variance will be required to be approved prior to accepting civil plans.
  - b. Due to the shallow bedrock in the area, Underground Injection Control (UIC) registration may be a challenge to achieve. In accordance with State Law, existing and proposed Underground Injection Control structures need to be registered with the Washington State Department of Ecology. Proof of registration must be provided prior to plan acceptance.
  - c. Prior to final plat, a final drainage report and plan shall be submitted to the Development Services Center for review and acceptance.
  - d. An erosion / sediment control plan, detailing how dust and runoff will be handled during and after construction, shall be submitted to the Development Services Center for review and acceptance prior to construction.

**Date:** April 13, 2026

**Comments:** Ash Place Preliminary Long Plat

(Continuation)

**Access Comments**

13. Section 17G.080.065(9) of the Spokane Municipal Code states that driveways providing vehicle access to lots shall not serve more than (9) lots in a Unit Lot Subdivision unless approved by the City Engineer. The proposed Ash Place Plat has twenty (20) lots. Since this plat will be served by a roadway that meets Fire Department regulations, it is recommended that a private access in lieu of a driveway be constructed for this purpose. The distinction between a driveway and private access is the private access will be designed to meet Fire Department access requirements, including but not limited to roadway cross-section, width, turning radius, parking, and turnaround requirements.

**STATEMENTS TO BE INCLUDED IN THE DEDICATORY LANGUAGE**

1. Ten-foot utility and drainage easements as shown here on the described plat are hereby dedicated to the City and its permittees for the construction, reconstruction, maintenance, protection, inspections and operation of their respective facilities together with the right to prohibit structures that may interfere with the construction, reconstruction, reliability and safe operation of the same.
2. Development of the subject property, including grading and filling, are required to follow an erosion/sediment control plan that has been submitted to and accepted by the Development Services Center prior to the issuance of any building and/or grading permits.
3. Prior to the issuance of any building permits, the lots shall be connected to a functioning public or private water system complying with the requirements of the Development Services Center and having adequate pressure for domestic and fire uses, as determined by the Water and Hydroelectric Services Department and the Fire Department.
4. The water system shall be designed and constructed in accordance with City Standards. A pressure of 45 psi minimum at the property line is required for service connections supplying domestic flows. Pressures shall not drop below 20 psi at any point in the system during a fire situation. Pressures over 80 psi will require that pressure relief valves be installed at the developer's expense.
5. All stormwater and surface drainage generated on-site shall be disposed of on-site in accordance with SMC 17D.060 "Storm water Facilities", the Regional Stormwater Manual, Special Drainage Districts, City Design Standards, and, per the Project Engineer's recommendations, based on the drainage plan accepted for the final plat. Pre-development flow of off-site runoff passing through the plat shall not be increased (rate or volume) or concentrated due to development of the plat, based on a 50-year design storm. An escape route for a 100-year design storm shall be provided.
6. No building permit shall be issued for any lot in this plat until evidence satisfactory to the City Engineer has been provided showing that the recommendations of SMC 17.060 "Stormwater Facilities", the Regional Stormwater Manual, Special Drainage Districts, City Design Standards, and the Project Engineer's recommendations, based on the drainage plan accepted for this final plat, have been complied with. A surface drainage plan shall

**Date:** April 13, 2026

**Comments:** Ash Place Preliminary Long Plat

(Continuation)

be prepared for each lot and shall be submitted to Developer Services for review and acceptance prior to issuance of a building permit.

7. Slope easements for cut and fill, as deemed necessary by the Development Services Center in accordance with City Design Standards, are granted along all public right of ways.
8. Only City water and sanitary sewer systems shall serve the plat; The use of individual on-site sanitary waste disposal systems and private wells is prohibited.
9. All public / private improvements (access, sewer, storm sewer, and water) shall be constructed to City standards prior to the occupancy of any structures served by said improvements.
10. No building permit shall be issued for any lot in the plat until evidence satisfactory to the City Engineer has been provided showing that sanitary sewer and water improvements, constructed to City standards, have been provided to the lot in question.

cc: Development Services Center File

Tami Palmquist., Manager, Development Services

Eldon Brown, P.E. Principal Engineer, Development Services

Mike Nilsson, P.E., Principal Engineer, Development Services

Adam Hayden, E.I.T., Associate Traffic Engineer, Development Services

Dalton Kuhn, P.E., Associate Engineer, Development Services

Joelie Eliason, Engineering Technician IV

Joel Taylor, E.I.T., Associate Engineer



**Spokane Tribe of Indians**  
**Tribal Historic Preservation Office**  
PO box 100 Wellpinit WA 99040

March 31, 2026

To: Mellissa Owen, Planner

**RE: RFC: Z26-059PPLT ASH Place Unit Lot Subdivision**

Ms. Owen:

Thank you for allowing the Spokane Tribe of Indians the opportunity to comment on your undertaking is greatly appreciated.

The area is setting on top of our village sites that today's know as Spokane. These areas were occupied by our ancestors for hunting, fishing, gathering roots and plants for food and medicines long before Spokane was built, this project is in a very sacred and sensitive area to our tribe. Cultural resource material is limited, irreplaceable and provides the historical and cultural foundation of the Spokane Tribe and includes the traditional cultural resources, ancestral and sacred sites, historic locations and burial sites that is so important to the Spokane Tribe.

At this time the Spokane Tribe is requesting a TCP study completed before any ground disturbing activity.

A TCP study should be a part of every cultural resource study just as a review of archaeological / historic sites in the area is part of every cultural resource survey and no project is too small for a TCP study.

A COR permit should be required and that permit will ignite section 106 of the National Historic Preservation Act and this process will need to be followed.

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 in protecting our shared heritage.

If questions arise, please contact me at (509) 258 – 4222. Cell 509/951/0524

Sincerely,

**From:** [Owen, Melissa](#)  
**To:** [Randy Abrahamson](#)  
**Subject:** RE: Ash Place - request for follow-up regarding Section 106 compliance  
**Date:** Thursday, April 2, 2026 3:50:00 PM  
**Attachments:** [RE Ash Place Project.msg](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Randy,

The wetland report in questions was obtained by several community members concerned about protection of Drumheller Springs and Associated Wetland located on City Park property. Last week, Jeremy Sykes, Shorelines and Environmental Assistance (SEA) program Section Manager for Ecology (Eastern Region), responded to interested residents, Dennis Flynn and Jeri Bently, regarding the wetland evaluation and report that interested residents sponsored on City Parks property (email attached).

As per Jermey's email, the errors and inconsistencies with wetland delineation procedures in the ECO USA report were so extensive, Jeremy requested his staff not to expend more time reviewing it. Even without a full review of the report, Jermey's email includes 11 findings where the wetland report sponsored by residents is lacking and provides his professional opinion that the report was written with a specific objective in mind – to identify wetlands in the area that may limit the proposed development. Jeremy also recommends against relying on the ECOS USA report as a basis for objections to the proposal.

Based on the attached response from ecology, City Planning Staff will not consider the resident funded report as new credible information for which the development of this site would be impacted. This said, Ryan McNair, Wetland, Shoreland and Aquatic Resource Specialist, Shorelands & Environmental Assistance Program (Eastern Region Office) has requested the applicant confirm that no vernal pools existing on the project site. This request has already been forwarded to applicant team and will also be included as part of an "technically incomplete" letter that will be forwarded to the applicant team in the next week or two in association with the agency review process.

Please note that during the 23' review a wetland specialist was hired by the applicant to verify that no wetlands were found on the subject site. Please also note that the same biologist was also hired to verify the distance of the project from the known wetlands on the site and found the project to be located outside of the buffer. This information was entered into the record at the hearing for the 23' project. The SEPA review associated with the 23' project was upheld by the hearing examiner on appeal.

Unless credible evidence to support new information associated with wetlands on this site are received, the project site is not within any wetland buffer for which additional wetland projection under 17E.070 would apply.

Finally, please also note that any wetlands associated with the park's property do not appear to be subject to Army Corps review as it does not meet the criteria for their review – the Corps takes jurisdiction when the wetland is a Water of the US. It also appears that the Army Corps recently announced that they will stop regulating wetlands nationwide as a result of a 2023 US Supreme Court ruling reduced the scope of the Clean Water Act.

Unless you have different information from me on this front, I will not include the information regarding a COR permit under section 106 identified in your letter.

Thank you.

**Development Services Center is open Monday, Tuesday, Thursday, and Friday 8 am – 5 pm in person (11 am – 5 pm each Wednesday), [online](#) or over the phone at 509.625.6300!**



Melissa Owen | City of Spokane | Planning & Development Services  
509.625.6063 | [mowen@spokanecity.org](mailto:mowen@spokanecity.org)



---

**From:** Randy Abrahamson <[randya@SpokaneTribe.com](mailto:randya@SpokaneTribe.com)>  
**Sent:** Thursday, April 2, 2026 3:03 PM  
**To:** Owen, Melissa <[mowen@spokanecity.org](mailto:mowen@spokanecity.org)>  
**Subject:** Re: Ash Place - request for follow-up regarding Section 106 compliance

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

a Cor permit for the wetland report.

---

**From:** Owen, Melissa <[mowen@spokanecity.org](mailto:mowen@spokanecity.org)>  
**Sent:** Thursday, April 2, 2026 2:16 PM  
**To:** Randy Abrahamson <[randya@SpokaneTribe.com](mailto:randya@SpokaneTribe.com)>  
**Subject:** RE: Ash Place - request for follow-up regarding Section 106 compliance

Randy,

I have not yet had a chance to pull together information about the addresses that you provided yesterday during our site visit. As soon as I have that ready for you I will send it your way.

I do have a question about your request for a COR permit. When I looked this up online it appears that the compliance you are referring to is related to Federal project including federally funding projects. This project is not federally funded. Can you explain why you believe that Section 106 of the [National Historic Preservation Act](#) (NHPA), 54 USC § 306108 applies to this project.

Thank you.

**Development Services Center is open Monday, Tuesday, Thursday, and Friday 8 am – 5 pm in person (11 am – 5 pm each Wednesday), [online](#) or over the phone at 509.625.6300!**



Melissa Owen | City of Spokane | Planning & Development Services  
509.625.6063 | [mowen@spokanecity.org](mailto:mowen@spokanecity.org)



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**From:** Randy Abrahamson <[randya@SpokaneTribe.com](mailto:randya@SpokaneTribe.com)>  
**Sent:** Tuesday, March 31, 2026 2:52 PM  
**To:** Owen, Melissa <[mowen@spokanecity.org](mailto:mowen@spokanecity.org)>  
**Subject:**

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Randy Abrahamson  
Tribal Historic Preservation Officer (T.H.P.O.)

**From:** [Cravalho, Justin](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Re: RFC: Z26-059PPLT – Ash Place Unit Lot Subdivision Preliminary Long Plat – Comments Due April 2, 2026  
**Date:** Friday, April 3, 2026 1:02:29 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[Outlook-15lzv4yq.png](#)

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Hi Melissa,

Fire has no concerns, just a conditional approval that the access road (Toyon Lane) and water supply (fire hydrants) shall be provided and approved prior to delivery of combustible construction materials to the site.

Thank you.

**Justin M. Cravalho, Associate Engineer** | Spokane Fire Department | Associate Fire Protection Engineer  
509.625-7057 | fax 509.625.7006 | [jcravalho@spokanecity.org](mailto:jcravalho@spokanecity.org) | [\[spokanefire.org\]](http://spokanefire.org)[spokanefire.org](http://spokanefire.org)



*We enhance your quality of life, always earning your trust, by saving lives, preventing harm and protecting property with compassion and integrity.*

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**From:** Owen, Melissa <[mowen@spokanecity.org](mailto:mowen@spokanecity.org)>  
**Sent:** Thursday, March 19, 2026 2:05 PM  
**To:** Abrahamson, Randy <[randya@spokanetribe.com](mailto:randya@spokanetribe.com)>; Adams, Jonathan R. <[jradams@spokanecity.org](mailto:jradams@spokanecity.org)>; Development Services Center Addressing <[eradsca@spokanecity.org](mailto:eradsca@spokanecity.org)>; Allen, Mark V. <[mvallen@spokanecity.org](mailto:mvallen@spokanecity.org)>; Allenton, Scotty <[sallenton@spokanecity.org](mailto:sallenton@spokanecity.org)>; Tagnani, Angela <[atagnani@spokanecity.org](mailto:atagnani@spokanecity.org)>; Averyt, Chris <[caveryt@spokanecity.org](mailto:caveryt@spokanecity.org)>; Avista <[SpokaneCountyRE@avistacorp.com](mailto:SpokaneCountyRE@avistacorp.com)>; Lori Barlow <[lbarlow@spokanevalley.org](mailto:lbarlow@spokanevalley.org)>; mbasinger <[mbasinger@spokanevalley.org](mailto:mbasinger@spokanevalley.org)>; zbecker <[zbecker@cawh.org](mailto:zbecker@cawh.org)>; Black, Tirrell <[tblack@spokanecity.org](mailto:tblack@spokanecity.org)>; Brown, Eldon <[ebrown@spokanecity.org](mailto:ebrown@spokanecity.org)>; Brown, Rich (Cheney SD Operations) <[rbrown@cheneysd.org](mailto:rbrown@cheneysd.org)>; Buller, Dan <[dbuller@spokanecity.org](mailto:dbuller@spokanecity.org)>; Carveth, Brenna (County Public Works) <[bcarveth@spokanecounty.org](mailto:bcarveth@spokanecounty.org)>; Chanse, Andrew <[achanse@spokanelibrary.org](mailto:achanse@spokanelibrary.org)>; Chesney, Scott <[schesney@spokanecounty.org](mailto:schesney@spokanecounty.org)>; Chouinard, Sonya <[SonyaC@spokaneschools.org](mailto:SonyaC@spokaneschools.org)>; Coleman, Cindy (SPS) <[CindyCo@spokaneschools.org](mailto:CindyCo@spokaneschools.org)>; Corkins, Karen <[karen@s3r3solutions.com](mailto:karen@s3r3solutions.com)>; Cravalho, Justin <[jcravalho@spokanecity.org](mailto:jcravalho@spokanecity.org)>; Dahl, Lance <[idahl@spokanecity.org](mailto:idahl@spokanecity.org)>; David Moore <[David.J.Moore@usace.army.mil](mailto:David.J.Moore@usace.army.mil)>; Deatrich, Kerry <[kdeatrich@spokanecity.org](mailto:kdeatrich@spokanecity.org)>; Dept. of Archaeology and Historic Preservation <[sepa@dahp.wa.gov](mailto:sepa@dahp.wa.gov)>; Dept. of Ecology Shorelines <[EROShorelineNotices@ecy.wa.gov](mailto:EROShorelineNotices@ecy.wa.gov)>; Development Review Spokane Transit <[developmentreview@spokanetransit.com](mailto:developmentreview@spokanetransit.com)>; Development Services Center Building Plans Examiner <[eradsbpe@spokanecity.org](mailto:eradsbpe@spokanecity.org)>; DFW <[r1planning@dfw.wa.gov](mailto:r1planning@dfw.wa.gov)>; distrate ([dcistrate@spokanecounty.org](mailto:dcistrate@spokanecounty.org)) <[dcistrate@spokanecounty.org](mailto:dcistrate@spokanecounty.org)>; DNR <[sepacenter@dnr.wa.gov](mailto:sepacenter@dnr.wa.gov)>; DNR Aquatics

okay - I have updated the conditions as follows: **City of Spokane Fire Protection Engineer, Justin Cravalho:**  
**Conditions of Approval (Modified from Z23-587PPLT per email 04/03/26).**

1. The internal driveway will be required to be constructed for fire access. They will need to meet the minimum requirements of the Fire Code including a minimum 20' clear width and 50' external and 28' internal turning radii.
2. "Fire Lane – No Parking" signage is required on both sides of the private internal access every 150'.
3. Private Access (Toyon Lane, Tract 1) and water supply (internal fire hydrants) shall be provided and approved prior to delivery of combustible construction materials to the site. Temporary internal access will not be allowed to obtain the permits.

Cravalho, Justin Yesterday 5:13 PM

JC

Sounds great. Thanks Melissa!



**From:** [Note, Inga](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Ash Place unit lot  
**Date:** Monday, March 30, 2026 12:47:47 PM

---

Same as last time. No traffic concerns.



**Inga Note, P.E. PTOE** | City of Spokane | Senior Traffic Planning Engineer  
☎ 509.625.6331 | [inote@spokanecity.org](mailto:inote@spokanecity.org) | [spokanecity.org](http://spokanecity.org) | M-Th 7:00-5:30

**From:** [Hamad, Nicholas](#)  
**To:** [Owen, Melissa](#)  
**Subject:** RE: RFC: Z26-059PPLT – Ash Place Unit Lot Subdivision Preliminary Long Plat – Comments Due April 2, 2026  
**Date:** Thursday, April 2, 2026 4:38:06 PM  
**Attachments:** [image005.png](#)  
[image006.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)

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Good Afternoon Melissa,

Spokane Parks and Recreation has reviewed the proposed development and offers the below:

- This project is in close proximity to the existing ‘Drumheller Springs Park’ (APN 25014.2210 & 25014.3135), which is a designated ‘natural land’ park facility within the city’s park system intended to be preserved in a natural, undeveloped state. Due to the close proximity of the park land to the proposed project, and the public’s desire to protect the natural condition of the park, Spokane Parks recommends the developer take measures to ensure no construction activity, associated utility construction, construction parking, or other activity associated with the proposed development impact the public park land, and its contiguous right-of-way / frontage in any way.

Thank you,

-nick

Nick Hamad, PLA | Park Planning and Development Manager | City of Spokane Parks & Recreation  
Desk: 509.363.5452 | Cell: 509.724.3639 | [SpokaneParks.org](#)

*Emails and attachments sent to or from the City, including personal information, are presumptively public records that are subject to disclosure.- Chapter 42.56 RCW*

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**From:** Owen, Melissa <mowen@spokanecity.org>  
**Sent:** Thursday, March 19, 2026 2:06 PM  
**To:** Abrahamson, Randy <randya@spokanetribe.com>; Adams, Jonathan R. <jradams@spokanecity.org>; Development Services Center Addressing <eradsca@spokanecity.org>; Allen, Mark V. <mvallen@spokanecity.org>; Allenton, Scotty <sallenton@spokanecity.org>; Tagnani, Angela <atagnani@spokanecity.org>; Averyt, Chris <caveryt@spokanecity.org>; Avista <SpokaneCountyRE@avistacorp.com>; Lori Barlow <lbarlow@spokanevalley.org>; mbasinger <mbasinger@spokanevalley.org>; zbecker <zbecker@cawh.org>; Black, Tirrell <tblack@spokanecity.org>; Brown, Eldon <ebrown@spokanecity.org>; Brown, Rich (Cheney SD Operations) <rbrown@cheneysd.org>; Buller, Dan <dbuller@spokanecity.org>; Carveth, Brenna (County Public Works) <bcarveth@spokanecounty.org>; Chanse, Andrew <achanse@spokanelibrary.org>; Chesney, Scott <schesney@spokanecounty.org>; Chouinard, Sonya <SonyaC@spokaneschools.org>; Coleman, Cindy (SPS) <CindyCo@spokaneschools.org>; Corkins, Karen <karen@s3r3solutions.com>; Cravalho, Justin <jcravalho@spokanecity.org>; Dahl, Lance <idahl@spokanecity.org>; David Moore <David.J.Moore@usace.army.mil>; Deatrich, Kerry

**From:** [Kendall, Karen](#)  
**To:** [Owen, Melissa](#)  
**Cc:** [Luse, John](#); [Ryan Andrade](#); [Todd Whipple](#)  
**Subject:** Avista's comments RFC: Z26-059PPLT – Ash Place Unit Lot Subdivision Preliminary Long Plat  
**Date:** Wednesday, April 1, 2026 2:39:20 PM  
**Attachments:** [image007.png](#)  
[image008.png](#)  
[image009.png](#)

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Hi Melissa,

Thank you for the opportunity to comment. Avista has reviewed the above referenced plat and notes that we provide gas and electrical services to the subject parcel.

We ask for the following to be carried forward as conditions of the subdivision and be addressed prior to final platting and recording.

1. On the final subdivision map include the following.
  - a. Provide a 10-foot utility easement along N. Ash Place.
  - b. On Lot 3, Block 1 provide a 5-foot easement centered and surrounding existing down guy and anchor coming from pole (No. 497976) located on east side of N. Ash Place, adjacent to subject parcel.
  - c. Provide a 10-foot utility easement along the east property line of Lots 1-3, Block 1 and Lots 1-7, Block 2, adjacent to Toyon Lane.
  - d. Provide a 10-foot utility easement along the west side of Lots 1-10, Block 3, Tract A and Tract D, adjacent to Toyon Lane.
2. Please include the following in the dedication language.
  - a. Utility easements shown hereon the described plat are hereby dedicated to the City and serving utility providers for the construction, reconstruction, maintenance and operation of utilities and cable television, together with the right to inspect said utilities and to trim and/or remove brush and trees which may interfere with the construction, maintenance and operation of same.
  - b. A 10-foot easement for utilities, including cable television, is hereby granted along all street frontages to the City and serving utility providers.
  - c. Avista shall have the right to prohibit changes in grade to above and below installed facilities within the utility easements as granted herein.
  - d. No building, structure, fence or landscaping is allowed within the easements as granted herein that may interfere with Avista's rights or with the safe operation of the Facilities or that are not in compliance with all safety and building codes, regulations and laws.
  - e. If the developer or their subcontractor ditches beyond the limits of the as-platted easement strips as granted herein, additional easements will need to be acquired to cover the utility lying outside of the easement area.
  - f. The private street easement as shown hereon is dedicated for utility purposes in

addition to ingress and egress as stated.

If you have any questions, don't hesitate to contact me.

Thank you,

**Karen Kendall, RWA**  
Permit Coordinator | Real Estate

PHONE 509-495-7599 | FAX 509-495-8469  
[www.myavista.com](http://www.myavista.com)



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**From:** Owen, Melissa <mowen@spokanecity.org>

**Sent:** Thursday, March 19, 2026 2:06 PM

**To:** Abrahamson, Randy <randya@spokanetribe.com>; Adams, Jonathan R. <jradams@spokanecity.org>; Development Services Center Addressing <eradsca@spokanecity.org>; Allen, Mark V. <mvallen@spokanecity.org>; Allenton, Scotty <sallenton@spokanecity.org>; Tagnani, Angela <atagnani@spokanecity.org>; Averyt, Chris <caveryt@spokanecity.org>; SpokaneCountyRE <SpokaneCountyRE@avistacorp.com>; Lori Barlow <lbarlow@spokanevalley.org>; mbasinger <mbasinger@spokanevalley.org>; zbecker <zbecker@cawh.org>; Black, Tirrell <tblack@spokanecity.org>; Brown, Eldon <ebrown@spokanecity.org>; Brown, Rich (Cheney SD Operations) <rbrown@cheneysd.org>; Buller, Dan <dbuller@spokanecity.org>; Carveth, Brenna (County Public Works) <bcarveth@spokanecounty.org>; Chanse, Andrew <achanse@spokanelibrary.org>; Chesney, Scott <schesney@spokanecounty.org>; Chouinard, Sonya <SonyaC@spokaneschools.org>; Coleman, Cindy (SPS) <CindyCo@spokaneschools.org>; Corkins, Karen <karen@s3r3solutions.com>; Cravalho, Justin <jcravalho@spokanecity.org>; Dahl, Lance <idahl@spokanecity.org>; David Moore <David.J.Moore@usace.army.mil>; Deatrich, Kerry <kdeatrich@spokanecity.org>; Dept. of Archaeology and Historic Preservation <sepa@dahp.wa.gov>; Dept. of Ecology Shorelines <EROShorelineNotices@ecy.wa.gov>; Development Review Spokane Transit <developmentreview@spokanetransit.com>; Development Services Center Building Plans Examiner <eradscbpe@spokanecity.org>; DFW <r1planning@dfw.wa.gov>; distrate (dcistrate@spokanecounty.org) <dcistrate@spokanecounty.org>; DNR <sepacenter@dnr.wa.gov>; DNR Aquatics <dnrreaqualeasingrivers@dnr.wa.gov>; Dobson, Harley <hdobson@spokanecity.org>; Eliason, Joelle <jeliason@spokanecity.org>; Engineering Admin <eraea@spokanecity.org>; Fairchild AFB Community Projects <92CES.CEN.CommunityProjCoord@us.af.mil>; Figg, Greg <figgg@wsdot.wa.gov>; Finger, Jeanne <jfinger@spokanecity.org>; Fredrickson, Beryl <bfredrickson@spokanecity.org>; Garcia, Luis <lgarcia@spokanecity.org>; Gardner, Spencer <sgardner@spokanecity.org>; Geiger, Cara <cgeiger@spokanecity.org>; Gennett, Raylene <rgennett@spokanecity.org>; Greene, Barry <BGreene@spokanecounty.org>; Grimm, Kevin <KevinGr@spokaneschools.org>; Hamad, Nicholas <nhamad@spokanecity.org>; Hamlin, Heather <hhamlin@spokanecity.org>; Hanson, Tonilee <sajbinfo@gmail.com>; Harris, Clint E.

**From:** [MacNaughton, James \(DAHP\)](#)  
**To:** [Owen, Melissa](#)  
**Cc:** [Randy Abrahamson](#); [Guy Moura](#); [Amelia Stanger](#); [Darnell Sam \(darnell.sam.adm@colvilletribes.com\)](#); [John Sirois \(john.sirois.adm@colvilletribes.com\)](#); [karen.capuder.adm@colvilletribes.com](#); [Kiana Sam](#); [milton.davis.adm@colvilletribes.com](#)  
**Subject:** 2026-03-02326 - RE: RFC: Z26-059PPLT – Ash Place Unit Lot Subdivision Preliminary Long Plat – Comments Due April 2, 2026  
**Date:** Thursday, March 26, 2026 3:08:54 PM  
**Attachments:** [image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[2026-03-02326\\_Concur\\_with\\_Survey.pdf](#)

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Good Afternoon Melissa


We were able to apply the CRS from the earlier project at this situs, so attached please find a letter from DAHP concurring with the findings, results and recommendations from the Cultural Resources Survey (CRS) entitled “CRS for the Ash Place Townhomes Project, Spokane County, WA,” (Fitzpatrick et al. 2024). As no cultural resources were discovered during survey and testing, no further direct archaeological supervision of the project is required; however, it is strongly advised that an Inadvertent Discovery Plan (IDP) is followed, with a copy kept onsite at all times, and having all crew members briefed on IDP procedures.

Please note this is only the opinion of DAHP and Affected Tribes may have access to proprietary information unavailable to DAHP at the time of this writing. Comments from Tribal Cultural Services departments or significant changes to project design may require review of this decision.

If you have any questions please feel free to contact me.

Regards

James

	<p><b>James MacNaughton, MSc, RPA (<i>He/Him</i>)</b> Local Government Archaeologist Email: <a href="mailto:James.MacNaughton@dahp.wa.gov">James.MacNaughton@dahp.wa.gov</a> Mobile: (360) 280-7563   Main Office: (360) 586-3065 Hours: 7AM - 3:30PM Monday to Friday Physical Address: 1110 Capitol Way South Suite 30, Olympia, WA 98501 Mailing Address: PO Box 48343, Olympia, WA 98504-8343 <a href="http://www.dahp.wa.gov">www.dahp.wa.gov</a></p>
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**From:**  
Owen,  
Melissa



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

March 26, 2026

Melissa Owen  
Assistant Planner II  
City of Spokane

In future correspondence please refer to:  
Project Tracking Code: **2026-03-02326**  
Property: City of Spokane - Ash Place Preliminary Long Plat (Z26-059PPLT)  
Re: **Concur with Survey; Follow Inadvertent Discovery Plan**

Dear Melissa Owen:

Thank you for contacting the State Historic Preservation Officer (SHPO) and the Department of Archaeology and Historic Preservation (DAHP) with documentation regarding the above-referenced project. We were able to apply the CRS from the earlier project at this situs, therefore we concur with the results and recommendations made in the report entitled "Cultural Resource Survey for the Ash Place Townhomes Project, Spokane County, WA," (Fitzpatrick et al. 2024). Specifically, as no cultural resources were found during the survey we do not recommend further direct archaeological supervision of the project. However, we do recommend that a standard Inadvertent Discovery Plan is followed during all ground disturbing activities.

Please note that the recommendations provided in this letter reflect only the opinions of DAHP. Any interested Tribes may have different recommendations. We appreciate receiving copies of any correspondence or comments from Tribes or other parties concerning cultural resource issues that you receive.

These comments are based on the information available at the time of this review and on behalf of the SHPO pursuant to Washington State law. Please note that should the project scope of work and/or location change significantly, please contact DAHP for further review.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is attached to any future communications about this project. Should you have any questions, please feel free to contact me.

Sincerely,

James MacNaughton, M.S.  
Local Government Archaeologist  
(360) 280-7563  
James.MacNaughton@dahp.wa.gov



**From:** [Geiger, Cara](#)  
**To:** [Owen, Melissa](#)  
**Cc:** [Taxes and Licenses](#)  
**Subject:** RE: RFC: Z26-059PPLT – Ash Place Unit Lot Subdivision Preliminary Long Plat – Comments Due April 2, 2026  
**Date:** Friday, March 20, 2026 9:15:06 AM  
**Attachments:** [image005.png](#)  
[image006.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)

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Hi Melissa,

There was a LID against these parcel 25014.4207, but have been paid off. See screenshot.



The following assessment details were found for parcel: **25014-4207**

-----  
**Address:** 3242 N Ash PL

**LID:** 25014-4207-12066

**Original Assessment:** \$55415.02

**Status:** Paid in full  
-----



**Cara Geiger** | CITY OF SPOKANE | TAXES & LICENSES SPECIALIST

509.625.6070 main | 509.625.6341 personal | [cgeiger@spokanecity.org](mailto:cgeiger@spokanecity.org) | [spokanecity.org](http://spokanecity.org)

Emails and attachments sent to or from the City, including personal information, are presumptively public records that are subject to disclosure. - Chapter 42.56 RCW

**Working Hours M-F 7am-3:30pm**

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**From:** Owen, Melissa <mowen@spokanecity.org>  
**Sent:** Thursday, March 19, 2026 2:06 PM  
**To:** Abrahamson, Randy <randya@spokanetribe.com>; Adams, Jonathan R.



Date: 3/23/26

To: Melissa Owens, Spokane

RE: Spokane Regional Clean Air Agency Requirements for:

Project Name: Subdivision, Ash Place Townhomes

File or Permit #:

Site Address: 3242 N Ash Pl

Parcel #: 25014.4207, 25014.4701, 25014.4702

The following is a list of concerns/issues that may need to be addressed for this project as determined from information received by this office. The list is provided as a summary of general requirements and does not relieve the proponent from meeting all local, state, and/or federal regulations. For additional information or clarification, contact Spokane Clean Air at (509) 477-4727. Copies of Spokane Clean Air regulations are available at [www.SpokaneCleanAir.org](http://www.SpokaneCleanAir.org).

**Construction related requirements:**

- Dust emissions during demolition, construction, grading and excavation projects must be controlled. This may require the use of water sprays, tarps, sprinklers, or suspension of activity during certain weather conditions.
- Measures must be taken to avoid the deposition of dirt and mud from unpaved surfaces onto paved surfaces. If tracking or spills occur on paved surfaces, measures must be taken immediately to clean these surfaces.
- Spokane Clean Air strongly recommends that all traveled surfaces (i.e. ingress, egress, parking areas, access roads, etc.) be paved and kept clean to minimize dust emissions.
- Debris generated because of this project must be disposed of by means other than burning.
- If objectionable odors result from this project, effective control apparatus and measures must be taken to reduce odors to a minimum.
- Special attention should be given to proper maintenance of diesel-powered construction equipment to reduce the impact of diesel exhaust, a suspected carcinogen.

**Additional requirements:**

- Spokane Clean Air requires an Asbestos Survey to be performed by a certified AHERA Building Inspector prior to most renovation and all demolition projects. The project may also require a formal notification form to be submitted to Spokane Clean Air. Fees and waiting periods apply. Contact Spokane Clean Air at (509) 477-4727 and/or visit [www.SpokaneCleanAir.org](http://www.SpokaneCleanAir.org) before renovation or demolition activities begin to avoid potential compliance issues and/or project delays.
- A Notice of Construction and Application for Approval is required to be submitted and approved by Spokane Clean Air prior to the construction, installation, or establishment of an air pollution source. This includes emergency generators rated at 500 hp (375 kW) or higher and natural gas heating equipment units rated at 4 MMBTU/hr or higher (input). Contact Spokane Clean Air for a Notice of Construction application.

**From:** [92 CES/CEN Community Proj Coord](#)  
**To:** [Owen, Melissa](#)  
**Subject:** RE: RFC: Z26-059PPLT – Ash Place Unit Lot Subdivision Preliminary Long Plat – Comments Due April 2, 2026  
**Date:** Monday, March 23, 2026 12:05:44 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Good afternoon,

The area of the lot subdivision lies in Military Influence Areas 1 and 2. As long as the plots remain residential, this is compatible development with Fairchild AFB.

Very Respectfully,

KYLE D. KRUPANSKY, 1<sup>ST</sup> Lt, USAF  
Deputy Engineering Flight Commander  
Community Planner  
92 CES/CENP  
Fairchild AFB, WA  
DSN: 647-3937 COMM: 247-3937

---

**From:** Owen, Melissa <mowen@spokanecity.org>  
**Sent:** Thursday, March 19, 2026 2:06 PM  
**To:** Abrahamson, Randy <randya@spokanetribe.com>; Adams, Jonathan R. <jradams@spokanecity.org>; Development Services Center Addressing <eradsca@spokanecity.org>; Allen, Mark V. <mvallen@spokanecity.org>; Allenton, Scotty <sallenton@spokanecity.org>; Tagnani, Angela <atagnani@spokanecity.org>; Averyt, Chris <caveryt@spokanecity.org>; Avista <SpokaneCountyRE@avistacorp.com>; Lori Barlow <lbarlow@spokanevalley.org>; mbasinger <mbasinger@spokanevalley.org>; zbecker <zbecker@cawh.org>; Black, Tirrell <tblack@spokanecity.org>; Brown, Eldon <ebrown@spokanecity.org>; Brown, Rich (Cheney SD Operations) <rbrown@cheneysd.org>; Buller, Dan <dbuller@spokanecity.org>; Carveth, Brenna (County Public Works) <bcarveth@spokanecounty.org>; Chanse, Andrew <achanse@spokanelibrary.org>; Chesney, Scott <schesney@spokanecounty.org>; Chouinard, Sonya <SonyaC@spokaneschools.org>; Coleman, Cindy (SPS) <CindyCo@spokaneschools.org>; Corkins, Karen <karen@s3r3solutions.com>; Cravalho, Justin <jcravalho@spokanecity.org>; Dahl, Lance <idahl@spokanecity.org>; Moore, David J CIV USARMY CENWS (USA) <david.j.moore@usace.army.mil>; Deatrich, Kerry <kdeatrich@spokanecity.org>; Dept. of Archaeology and Historic Preservation <sepa@dahp.wa.gov>; Dept. of Ecology Shorelines <EROShorelineNotices@ecy.wa.gov>; Development Review Spokane Transit

**From:** [Sikes, Jeremy \(ECY\)](#)  
**To:** [Jeri Bentley; dpflynn@hotmail.com](#)  
**Cc:** [McNair, Ryan \(ECY\)](#); [Sheer, Mindi \(ECY\)](#); [Owen, Melissa](#)  
**Subject:** RE: Ash Place Project  
**Date:** Friday, March 27, 2026 11:48:30 AM

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Good morning, Dennis and Jeri.

I am the Shorelines and Environmental Assistance (SEA) program Section Manager for Ecology here in the Eastern Region. My group deals with wetlands, shorelines and floodplains in the 13 eastern Washington counties. Mindi Sheer, forwarded me messages you had sent concerning the proposed Ash Place project in your neighborhood. Your concerns about potential impacts to Drumheller Springs are appreciated and understandable. My program will not intervene or request lead entity status on the SEPA in question. We are familiar with the ECOS USA report you had created, and found that it is deeply flawed.

Typically, our review of wetland reports is related to permits under our review, and occasionally at the request of the local jurisdiction. The purpose is to improve or clarify these reports so that permits may be issued. The errors and inconsistencies with wetland delineation procedures in the ECO USA report were so extensive, I asked my staff not to expend more time reviewing it. Even if the report had contained credible evidence of wetland presence near the proposed development, my program would have no permit action to take. Wetland buffers are managed exclusively through the local Critical Areas Ordinance, and buffer encroachment is all the ECOS USA report alleges.

My three wetland and shorelines specialists cover a vast region, from Canada to Oregon. Further review of a flawed report for a project that would not result in permit actions would have been a misuse of their time. That said, Ryan McNair did spend several hours reviewing the ECOS USA report and conducted a site visit. Some of his findings are as follows:

- No delineation data sheets, or descriptions of soils at any plot were provided. Only a rating form. There was no way to verify what caused the consultant to draw a boundary for the wetlands found.
- There are no descriptions of any soil pits. Descriptions (with locations) of soils pits would describe horizons via hue, chroma and value (and/or sometimes texture) to meet a hydric soil indicator. The writing in this document suggests that the generalized NRCS soil survey profile description describes these indicators. It does not.
- Buffers depicted associated with the wetlands are not accurate. They lack uniformity and seemingly subjectively stop at the boundary of some parcels while extending into others.
- “WU-1 wetland boundary Drumheller CR” was flagged/marked in the field. I observed and took pictures of two of the markers. Some of these points were clearly non-wetland. One point was upslope of where the stream started, with no hydrology, no wetland vegetation, and only upland grasses and shrubs.

- The report section on the soils described the two series in the study area as a “wetland series” and an “upland series”. This is not correct. The NRCS web soil survey does not distinguish soils as wetland or upland. Further the soil the report inaccurately lists as a “wetland soil series” describes the depth to bedrock as 26” in locations that the report also identified as vernal pools. It is not possible for both to be true, because vernal pools only present very shallow soils.

Map products:

- The “WU-1 250ft creek buffer area” is a polygon outlined in blue with diagonal cross hatches and appears to show the buffer around the small stream. Although the creek runs in a southeasterly direction the buffer abruptly stops at the southern boundary but extends well into the neighboring northern parcels.
- The “PEM 1C WU-2” is a pink line and dot symbol appearing to show the delineated area of a wetland. This delineation does not enclose the supposed wetland and ends abruptly in the north and south.
- The “WU-2 PEMIC 250ft Buffer Area” Is a polygon that is outlined in pink and intersects some red dots ( unlabeled). This polygon appears to roughly follow the line feature of the “PEM 1C WU-2” at a presumably 250ft radius. However, this buffer extends on both sides of the line feature, and raises the question; how was the buffer measured for the western side if the wetland was not delineated on that extent, and how was the 250ft distance determined?
- The area depicted in the map as vernal pools (“WU-3 Vernal Pools Area”) contains an assortment of different herbaceous plants. These types of vegetation assemblages indicate a depth of soil that is not present in vernal pools. There might be vernal pools in Drumheller Springs park area but they are not present where the report claimed they are.
- The topography of the area depicted by the vernal pool polygon (“WU-3 Vernal Pools Area”) is inconsistent with the type that could harbor vernal pools. Vernal pools in eastern Washington were formed on flat areas of exposed basalt. The area depicted in the delineation encompasses areas with rolling and sloping segments of soil. The vernal pool map polygons seem to have inconsistent boundaries. In some parts they follow the parcel line and other cases they do not.
- “WU-1 wetland boundary Drumheller CR” depicts the small stream that emerges from a spring. This was rated as a wetland. There may be a small area or two of wetland totaling 10 ft <sup>2</sup>, but the rest of the stream lies on basalt bedrock , and therefore, could not be classified as wetland. This feature should be depicted as a type NF stream, not wetland.

These observations are based only a quick site visit, and initial review of the report. A detailed review would likely reveal more issues.

As you can see, we have already expended a great deal of effort reviewing this, and one could surmise that the report was written with a specific objective in mind; identify wetlands in the area that may limit the proposed development. Ecology has an obligation under RCW 90.48 to protect all wetlands wherever they exist. This also obligates us require objective, accurate wetland

delineations following standard protocols to inform our work. Please continue to provide your input to the city as the project progresses. I would recommend against relying on the ECOS USA report as a basis for your objections.

*Jeremy Sikes*  
*Regional Section Manager*

Shorelands and Environmental Assistance (SEA) Program  
Department of Ecology - Eastern Region  
4601 N Monroe  
Spokane, Washington 99205

Cell- (509) 481-1913

*Please note: This communication is public record and may be subject to disclosure as per the Washington State Public Records Act, RCW 42.56.*

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**From:** Sheer, Mindi (ECY) <MSHE461@ECY.WA.GOV>  
**Sent:** Friday, March 27, 2026 8:09 AM  
**To:** Jeri Bentley <jekayb@gmail.com>  
**Cc:** McNair, Ryan (ECY) <RMCN461@ECY.WA.GOV>; Sikes, Jeremy (ECY) <JSIK461@ECY.WA.GOV>  
**Subject:** RE: Ash Place Project

Hi Jen,

Thank you for reaching out. I am cc'ing Ryan McNair and our section lead Jeremy Sikes on this response. Ryan is the specialist who covers City of Spokane permitting. He is on travel today, but

one of them should be able to respond back soon.

Regards,

Mindi

*Mindi Sheer*

**Shoreland and Aquatic Resource Specialist**

Shorelands and Environmental Assistance Program

Department of Ecology | Eastern Region

4601 N Monroe, Spokane, Washington 99205

Cell 509-601-9546 | [Mindi.Sheer@ecy.wa.gov](mailto:Mindi.Sheer@ecy.wa.gov)

*This communication is a public record and may be subject to disclosure as per the Washington State Public Records Act, RCW 42.56.*

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**From:** Jeri Bentley <[jekayb@gmail.com](mailto:jekayb@gmail.com)>  
**Sent:** Thursday, March 26, 2026 8:21 PM  
**To:** Sheer, Mindi (ECY) <[MSHE461@ECY.WA.GOV](mailto:MSHE461@ECY.WA.GOV)>  
**Subject:** Ash Place Project

External Email

o Hi Ms Sheer

I am a part of a group that paid for a Certified Wetland Report by ECOS USA and that submitted this report to the City. This report was made available to Whipple Consulting Engineers at the December 2, 2025 Community Meeting.

Our Certified Wetland Report is being suppressed while a winter-time spot-survey completed by Dawes is being promoted.

"WAC 197-11-340(3)(a)(ii) Determination of Non-Significance" states: "The lead agency shall withdraw DNS if: There is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts;"

Since the City and the Developer are ignoring our Certified Wetland Report, we ask Ecology to step in as Lead Agency on this project to ensure the wetlands are protected

Thank you for your consideration of this matter,  
Jeri Bentley  
2318 W Liberty Ave  
Spokane. 99205

**From:** [McNair, Ryan \(ECY\)](#)  
**To:** [Owen, Melissa](#)  
**Subject:** RE: RFC: Z26-059PPLT – Ash Place Unit Lot Subdivision Preliminary Long Plat – Comments Due April 2, 2026  
**Date:** Friday, March 20, 2026 8:28:15 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Hi Melissa,

Please see my comments below:

There was mention of a wetland survey in the critical areas checklist but I did not see this document provided. If this document does not rule out vernal pools specifically or was not conducted during the appropriate timeframe, a qualified wetland professional with experience in delineating vernal pools should be consulted for the survey of the features. Although disturbance is evident on this site, the parcels could contain vernal pools. Surveys for these features should be conducted March through May. Vernal pools are frequently missed outside of these time frames.

Vernal pools can be frequently categorized as high category wetlands and special characteristic wetlands with larger buffers. They are hard to replicate making compensatory mitigation of direct impacts difficult.

Please reach out to Ryan McNair for more information or with questions or concerns via email at [ryan.mcnair@ecy.wa.gov](mailto:ryan.mcnair@ecy.wa.gov) or via phone at (509)309-5547

Ryan McNair  
Wetland, Shoreland and Aquatic Resource Specialist  
Shorelands & Environmental Assistance Program  
Eastern Region Office  
[rmcn461@ecy.wa.gov](mailto:rmcn461@ecy.wa.gov)  
(509) 309-5547



---

**From:** Owen, Melissa <[mowen@spokanecity.org](mailto:mowen@spokanecity.org)>

**From:** [McNair, Ryan \(ECY\)](#)  
**To:** [Owen, Melissa](#)  
**Cc:** [Sikes, Jeremy \(ECY\)](#); [Austin Fuller](#); [Brad Boswell](#); [Todd Whipple](#); [Ryan Andrade](#); [Save](#)  
**Subject:** RE: Dawes review: Ash Place ( Z26-059PPLT)  
**Date:** Tuesday, April 14, 2026 10:21:47 AM  
**Attachments:** [image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image012.png](#)  
[image001.png](#)

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Hi Melissa,

The site visit Larry Dawes completed earlier this month satisfies my concerns. I do not feel a meeting on site is necessary.

Thank you for coordinating and offering these times. I am available for assistance should you need more clarification.

Sincerely,

Ryan McNair  
Wetland, Shoreland and Aquatic Resource Specialist  
Shorelands & Environmental Assistance Program  
Eastern Region Office  
[rmcn461@ecy.wa.gov](mailto:rmcn461@ecy.wa.gov)  
(509) 309-5547



---

**From:** Owen, Melissa <[mowen@spokanecity.org](mailto:mowen@spokanecity.org)>  
**Sent:** Thursday, April 9, 2026 4:19 PM  
**To:** McNair, Ryan (ECY) <[RMCN461@ECY.WA.GOV](mailto:RMCN461@ECY.WA.GOV)>  
**Cc:** Sikes, Jeremy (ECY) <[JSIK461@ECY.WA.GOV](mailto:JSIK461@ECY.WA.GOV)>; Austin Fuller <[afuller@whipplece.com](mailto:afuller@whipplece.com)>; Brad Boswell <[brad@boswellhomes.com](mailto:brad@boswellhomes.com)>; Todd Whipple <[toddw@whipplece.com](mailto:toddw@whipplece.com)>; Ryan Andrade <[randrade@whipplece.com](mailto:randrade@whipplece.com)>; Save <[save@whipplece.com](mailto:save@whipplece.com)>  
**Subject:** Dawes review: Ash Place ( Z26-059PPLT)

External Email

Ryan,

Below you will see an email chain from Todd Whipple with includes a response from Larry Dawes following another site visit to the Ash Place project site at 3242, 3230, and 3224 N Ash Place this past Saturday. Also attached is the response that was submitted to the hearing examiner in 2025 regarding the 23' application (Z23-587PPLT). The attached letter from Larry Dawes was submitted in response to a SEPA appeal from the neighborhood to that prior 23' application.

Should you feel that a meeting on site is appropriate, I am happy to coordinate a meeting between the project team, the City and Ecology. I am available the following times over the next two weeks if we need to coordinate a meeting:

Mon 04/13 – after 9:30 am

Tues 04/14 – between 10 am and 1 pm or after 4 pm

Wed 04/15 – after 10 am

Thurs 04/16 – before noon or after 4 pm

Fri 04/17 – any time

Mon 04/20 – after 9:30 am

Tues 04/21 before 1 or after 2:30

Wed 04/22 any time

Thank you for your time.

**Development Services Center is open Monday, Tuesday, Thursday, and Friday 8 am – 5 pm in person (11 am – 5 pm each Wednesday), [online](#) or over the phone at 509.625.6300!**



Melissa Owen | City of Spokane | Planning & Development Services  
509.625.6063 | [mowen@spokanecity.org](mailto:mowen@spokanecity.org)



---

**From:** Todd Whipple <[toddw@whipplece.com](mailto:toddw@whipplece.com)>

**Sent:** Monday, April 6, 2026 8:08 AM

**To:** Owen, Melissa <[mowen@spokanecity.org](mailto:mowen@spokanecity.org)>; Ryan Andrade <[randrade@whipplece.com](mailto:randrade@whipplece.com)>; Ben Goodmansen <[bgoodmansen@whipplece.com](mailto:bgoodmansen@whipplece.com)>; Austin Fuller <[afuller@whipplece.com](mailto:afuller@whipplece.com)>; Save <[save@whipplece.com](mailto:save@whipplece.com)>

**Subject:** FW: Dawes: Ash Place

[CAUTION - EXTERNAL EMAIL - Verify Sender]

*Melissa,*

*As requested and during the correct time of the year, Larry Dawes, our biologist has now visited the site 3 times with the same results. His previous report is attached and his comments about this visit are in the email chain below.*

*No wetland found on site, thank you.*

Sincerely,  
Whipple Consulting Engineers, Inc.

Todd R. Whipple, P.E.  
President

[toddw@whipplece.com](mailto:toddw@whipplece.com)

[Whipple Consulting Engineers, Inc.](#)

Phone: 509.893.2617 | Fax: 509.926.0227



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**From:** Larry Dawes <[bswinc@icehouse.net](mailto:bswinc@icehouse.net)>

**Sent:** Saturday, April 4, 2026 1:38 PM

**To:** Todd Whipple <[toddw@whipplece.com](mailto:toddw@whipplece.com)>

**Cc:** 'Melissa' <[mowen@spokanecity.org](mailto:mowen@spokanecity.org)>; [RMCN461@ECY.WA.GOV](mailto:RMCN461@ECY.WA.GOV); Sikes, Jeremy (ECY) <[jeremy.sikes@ecy.wa.gov](mailto:jeremy.sikes@ecy.wa.gov)>; 'Jeremy (ECY)' <[JSIK461@ECY.WA.GOV](mailto:JSIK461@ECY.WA.GOV)>; Austin Fuller

<[afuller@whipplece.com](mailto:afuller@whipplece.com)>; 'Brad Boswell' <[brad@boswellhomes.com](mailto:brad@boswellhomes.com)>; Todd Whipple  
<[toddw@whipplece.com](mailto:toddw@whipplece.com)>; Ryan Andrade <[randrade@whipplece.com](mailto:randrade@whipplece.com)>

**Subject:** Dawes: Ash Place

**NOTE:** This Message is from outside our organization,  
Use caution before clicking on links or opening attachments !

Hi Todd:

At your request I visited the Ash Place site again. I first investigated the site in September 2024 and submitted a report of my findings that there are no wetlands on the site and the site is not encumbered by the buffer of any wetlands. I was asked to revisit the site in March 2025 to verify those findings. I used a laser rangefinder to measure the precise distances between the closest point of on the subject property and the closest point of wetlands on adjacent property. Assuming the worst-case scenario of a 250-foot buffer I stated again that the site is not encumbered by the buffer of any wetlands and verified my initial finding that there are no wetlands on the subject property. That report is attached to this email. This is not a complicated site and my findings should not be controversial. However, in April 2026, I was asked to visit the site a third time to verify there are no wetlands on the subject property. I visited the site on April 4, 2026 and verified for the third time there are no wetlands on the site and the site is not encumbered by the buffer of any wetland. I stand by the findings of my first two reports.

Regards

Larry Dawes

Biology Soil & Water, Inc.

3102 N. Girard Road

Spokane Valley, WA 99212-1529

(509) 327-2684

[bswinc@icehouse.net](mailto:bswinc@icehouse.net)

**From:** [bswinc@icehouse.net](mailto:bswinc@icehouse.net)  
**To:** [Austin Fuller](mailto:Austin_Fuller)  
**Cc:** [Todd Whipple](mailto:Todd_Whipple); [Ben Goodmansen](mailto:Ben_Goodmansen); [brad@boswellhomes.com](mailto:brad@boswellhomes.com); "Ron Thomas"  
**Subject:** RE: Ash Place Townhomes Wetland delineation/letter WCE 3505  
**Date:** Monday, September 9, 2024 4:52:06 PM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[image006.png](#)

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Greetings all:

I completed a wetland reconnaissance at the site located at 3242 N. Ash. N. Ash Place defines the west edge of the property and N. Ash Street defines the east edge of the property. The building site is located on a terrace about 30 feet higher in elevation than N. Ash Street. Heading east from N. Ash Place the surface elevation rises a bit so no surface water runs onto the site from the road or adjacent properties to the west. The west 3/4 of the property is rock outcroppings and shallow soils on top of bedrock. The vegetation on the terrace is distinctly upland in character. The highest elevation occurs near the center of the property, so the site slopes north, south, east and west from that central high point with the most dramatic slope being east toward N Ash St. The east 1/4 of the site is characterized by a steep drop in elevation down to N Ash Street. The steep slope has an overstory of maple trees and understory dominated by Oregon grape and other upland shrubs and grasses. No wetland characteristics were observed on the hillside or at the toe of the slope. Google Earth air photos indicate spoil piles were placed on the terrace between 2006 and 2009. Some of the piles may have been removed later. More spoil piles appeared between 2015 and 2016. The spoils include some concrete and steel cable, but mostly consist of soil and rock cobbles. The surface conditions under the spoils could not be evaluated, but historical air photos do not indicate any depressions or characteristics other than rock outcrop. I did not observe any wetland soils, vegetation, or hydrology. A neighbor stated there was standing water somewhere on the site but I do not know the year or date of that observation. It is possible that surface water could temporarily pond on top of bedrock for brief periods of time from rain or snow, but the depressions are not of sufficient depth or area for surface water to exist two weeks into the growing season. None of the subtle depressions observed would meet the wetland hydrology criteria or hydrophytic vegetation criteria as required to be defined as a wetland. Feel free to share this assessment with your clients and jurisdictions. If you have comments or require additional information, please contact me at your convenience.

Good luck with the project.

Larry

Regards

Larry Dawes  
Biology Soil & Water, Inc.  
3102 N. Girard Road  
Spokane Valley, WA 99212-1529  
(509) 327-2684  
[bswinc@icehouse.net](mailto:bswinc@icehouse.net)

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**From:** Austin Fuller <[afuller@whipplece.com](mailto:afuller@whipplece.com)>  
**Sent:** Friday, September 6, 2024 12:02 PM  
**To:** [bswinc@icehouse.net](mailto:bswinc@icehouse.net)  
**Cc:** [Todd Whipple](mailto:Todd_Whipple) <[toddw@whipplece.com](mailto:toddw@whipplece.com)>; [Ben Goodmansen](mailto:Ben_Goodmansen) <[bgoodmansen@whipplece.com](mailto:bgoodmansen@whipplece.com)>; [brad@boswellhomes.com](mailto:brad@boswellhomes.com); 'Ron Thomas' <[mypsokanebanker@yahoo.com](mailto:mypsokanebanker@yahoo.com)>  
**Subject:** Ash Place Townhomes Wetland delineation/letter WCE 3505

Hello Larry,

We are working on a preliminary plat on 3242 N. Ash Place. The city received a letter that there was standing water on the site and is requiring a wetland delineation for this project. Could you please go out and verify if a wetland is present on site? I've attached the current preliminary plat, the geotechnical report and the letter from the City in case you need any of those documents.

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

RE: Ash Place Wetland Issues

Greetings Todd Whipple:

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

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

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



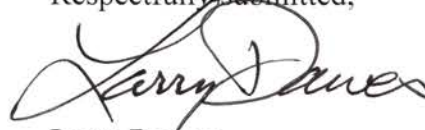
The suggestion that the subject parcel is partly encumbered by wetland buffer appears to have been based on a wetland and associated buffer depicted on the Spokane County interactive Map Viewer since a copy of that Map Viewer page was attached to the comment and appeal of the DNS. This mapping system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

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

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

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

Respectfully submitted,

A handwritten signature in black ink that reads "Larry Dawes". The signature is fluid and cursive, with the first name "Larry" being more prominent than the last name "Dawes".

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

**From:** [Audubon-Downriver Neighborhood Council](#)  
**To:** [Owen, Melissa](#); [Klitzke, Kitty](#); [Zappone, Zack](#); [mmcspo@yahoo.com](#); [lindalouise701184951@yahoo.com](#); [Luke Tolley](#); [caroline@ucut-nsn.org](#); [cody@ucut-nsn.org](#); [jerry@ucut-nsn.org](#); [Hamlin, Heather](#); [laura@ucut-nsn.org](#)  
**Cc:** [Audubon-Downriver](#)  
**Subject:** Submission of ADNC Resolution Opposing the Ash Place Development  
**Date:** Wednesday, April 1, 2026 7:23:28 PM  
**Attachments:** [ADNC-Resolution No. 2026-01-signed.pdf](#)

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

To:  
Melissa Owen, Senior Planner  
Spokane City Council  
Upper Columbia United Tribes (UCUT)  
Community Assembly Land Use Committee  
Community Assembly Liaison to the Plan Commission  
Community Assembly Administrative Committee

Dear Ms. Owen and Esteemed Members of the City Council, UCUT, and Community Assembly,

On behalf of the Audubon-Downriver Neighborhood Council, I am submitting the attached Resolution formally stating our Council's opposition to the proposed Ash Place development adjacent to Drumheller Springs Park.

This Resolution reflects extensive community concern about the project's potential impacts on groundwater flow, the documented spring-fed wetland ecosystem, the site's cultural and historical significance, and the anticipated strain on neighborhood infrastructure and parking capacity. The Council adopted this Resolution after reviewing both the developer's materials and the independently commissioned ECOS USA wetlands study, as well as testimony from residents and subject-matter experts.

We respectfully request that this Resolution be entered into the public record and considered by City staff, the Plan Commission, and the City Council as part of the review process for this project.

We also respectfully request that Upper Columbia United Tribes (UCUT) also have an opportunity to voice their concerns about this historically and culturally significant wetland area.

Please let us know if additional documentation, testimony, or neighborhood input would be helpful as you evaluate this proposal.

Sincerely,

**D. Steve Cox**  
Chair, Audubon-Downriver Neighborhood Council  
[audubondownriver@gmail.com](mailto:audubondownriver@gmail.com)  
[509] 979-5269

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## Audubon Downriver Neighborhood Council

### Resolution No. 2026-01 Opposing the Proposed Ash Place Development

#### A Resolution of the Audubon-Downriver Neighborhood Council Opposing the Ash Place Development Adjacent to Drumheller Springs Park

**WHEREAS**, the natural area known as Drumheller Springs Park contains a potable, year-round freshwater spring, and the proposed Ash Place development may disturb the underlying aquifer, potentially altering groundwater flow and redirecting water toward neighboring homes;

**WHEREAS**, the developer's wetlands assessment was conducted during the fall, the driest period of the year, and therefore did not identify a wetland, while neighboring residents commissioned an independent, certified springtime study by ECOS USA, which documented "significant new information indicating a probable significant adverse environmental impacts" (WAC 197-11-340(3)(a)(ii)) and a vibrant and functioning wetland system, available on the "Wetland Report" tab at <https://concernedcompanions.com/Ash/>;

**WHEREAS**, this wetland supports a diverse range of wildlife, including freshwater amphipods (pond shrimp), little brown bats, silver-haired bats, and numerous bird species such as song sparrows, red-winged blackbirds, northern flickers, and migratory waterfowl, all of which rely on the spring-fed habitat for feeding, breeding, and seasonal movement;

**WHEREAS**, the proposed 20-unit townhouse project will require heavy equipment, significant grading, and on-site blasting, resulting in unavoidable impacts to surrounding roads, soils, vegetation, and the broader environmental conditions of the park and neighborhood;

**WHEREAS**, the City of Spokane Comprehensive Plan 3.3 specifies "Significant growth is directed to Centers and Corridors", LU-1.2 specifies "Housing density should decrease as the distance from the District Center increases", LU-1.3 specifies "ensuring that new development complements existing development", and LU-3.2 specifies "the highest density housing should be focused in and around the Neighborhood Center", and this project is 0.75 mile from North Monroe Corridor, 1.0 mile from the Garland Neighborhood Center, and 1.0 mile from the Shadle District Center;








## Audubon Downriver Neighborhood Council

**WHEREAS**, the site is recognized as a Traditional Cultural Property, having served as a gathering and camping area for Indigenous peoples for more than a millennium, and remains culturally and historically significant to the region's tribal communities;

**WHEREAS**, although the project meets the minimum requirement of one parking space per unit for an urban area, this allocation is insufficient for the anticipated demographic of future residents, many of whom are expected to own multiple vehicles and recreational equipment, thereby increasing congestion on neighborhood streets and around Drumheller Springs Park;

**THEREFORE, BE IT RESOLVED**, that the Audubon-Downriver Neighborhood Council stands firmly opposed to the Ash Place development as inappropriate for this location due to the environmental, cultural, infrastructural, and community impacts outlined above.

Adopted by the Audubon-Downriver Neighborhood Council on the 30th day of March, 2026.

Officer(s)	Printed Name	Signature	Date
Chair	D. Steve Cox		30 MAR 26
Vice-Chair	Stacey Page		30 Mar 26
Secretary	Andrea Kilgore		
Treasurer	John Jacobs		31 Mar 2026
CA Representative	Fran Papenleu		3/30/2026

**From:** [Anne Marie Liebhaber](#)  
**To:** [Owen, Melissa](#)  
**Cc:** [Zappone, Zack](#); [Klitzke, Kitty](#); [Wilkerson, Betsy](#); [Sondra Collins](#); [Dennis Flynn](#)  
**Subject:** Z26-059PPLT Public Comment  
**Date:** Thursday, April 2, 2026 3:54:25 PM  
**Attachments:** [Drumheller Comment 2026.docx](#)  
[VernalPool\\_3.png](#)  
[VernalPool2.png](#)  
[Vernal Pool.png](#)

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

I submit this Public Comment with Attachments in opposition to Ash Place Unit Preliminary Long Plat Z26-059PPLT.



[\\_Scan\\_20260402.png](#)



[\\_Scan\\_20260402\\_2.png](#)



[\\_Scan\\_20260402\\_3.png](#)



[\\_Scan\\_20260402\\_4.png](#)



[\\_Scan\\_20260402\\_5.png](#)

Thank you for your consideration.

Anne Marie Liebhaber  
1803 West Euclid Ave  
Spokane WA 99205

April 2, 2026

To: Melissa Owen, Senior Planner City of Spokane

The City of Spokane (hereafter City) and Whipple Consulting Engineers' (hereafter Applicant) assert that Ash Place Unit Lot Preliminary Long Plat Z26-059PPLT (hereafter Project) is exempt for SEPA. This is erroneous as neither the law nor the facts of this case support this Project being exempt from compliance with SEPA rules for the following reasons:

1. On Nov 18, 2025, City Planner Melissa Owen stated that "*The SEPA determination was already made and will remain in place for the new application assuming that the application is substantially similar to the original prior application*" in reply email to Dennis Flynn regarding SEPA status of current Project. Owen made no mention of exempt status.
2. Applicant's legally mandated signage of Notice of Community Meeting regarding current Project, posted on or about November 14, 2025, gave legal notice of SEPA: DNS ISSUED 2/21/25. Applicant's Sign Notice must contain SEPA status. *SMC 17G.061.210(D)(2)(e)*. Signage contained no notice of exempt status.
3. On January 6, 2026, Owen stated "*Ecology. . . concurred with City's determination that SEPA is completed for the Ash Place project. . . and a new application is anticipated to be substantially the same as the prior application*" regarding current Project in second reply email to Flynn. Owen made no mention of exempt status.
4. Then, on March 19, 2026 in third reply email to Flynn, Owen asserted for the first time that "*the current proposal is SEPA exempt under Sect. 17E.050.070 Flexible Thresholds for Categorical Exemptions*" followed by "*This said, the city's critical areas ordinance requires compliance regardless of whether or not a project triggers SEPA checklist review.*" *SMC 17E.050.040, 17E.050.250, 17E.050.260*. State Critical Areas rule also requires that "*a threshold determination shall be made for all such actions in critical areas*". *WAC 97-11-908(2)*. State environmental policy rules *shall* be accorded *substantial deference*. *RCW 43.21C.095*. Finally, long standing Washington case law further establishes that "Categorical exemptions do not apply to actions that are a mixture of exempt and non-exempt activities." *Foster v. King County, 83 Wn. App.339, 921 P.2d 552 (1996)*.
5. Nonetheless, on or about March 24, 2026, City posted online that "This Project (Z26-059PPLP) is *exempt from SEPA*." The prior WCE 2024 project (Z23-587PPLT) was *not SEPA exempt* and included multiple SEPA documents including a SEPA DNS appeal. The prior project was located on the exact same site containing multiple critical areas. <https://my.spokanecity.org/projects/ash-place-preliminary-long-plat/>

6. City cannot override existing municipal or state laws whose explicit terms do not allow SEPA exemption in critical areas. See *SMC 17E.050.0260*, *WAC 197-11-305(1)(a)*, *WAC 197-11-908*, *WAC 197-11-070*. In SEPA rules the term “shall” means mandatory application and agencies do not have authority to change SEPA definitions or apply agency discretion or interpretation. *WAC 197-11-700*, “*WAC 197-11-906*.”
7. It is undisputed that Project site encompasses multiple critical areas subject to SEPA rules. Applicant’s Feb 2025 Notice of Application of prior project asserted SEPA DNS which was in fact upheld by City Hearing Examiner after SEPA appeal. Applicant’s current “substantially the same” Project Notice of Community Meeting signage posted in Nov 2025 and City’s written Notice of Community Meeting issued at the same time both attest to adoption of prior project’s 2/21/2025 SEPA DNS to current Project. Accurate public notice of DNS issuance is mandated state law and municipal codes. See *SMC 17E.050.160(D)*. Additionally, both Applicant’s prior project (Z23-587PPLT) and current Project (Z26-059PPLT) contain Shoreline/ Critical Areas Checklist (dated 12/23/2023 and 01/26/2026 respectively) confirming multiple (five) critical areas on project site.

The City’s last minute, sudden reversal on its own assertions that prior project’s SEPA DNS is adopted to current Project is a blatant attempt to circumvent City’s legal obligation to consider the Drumheller Springs Park Certified Wetland Delineation Report by Sondra Collins ECOS USA prepared in May-June 2025 for neighborhood group *Concerned Companions* to protect Drumheller Springs from further degradation. *Concerned Companions* paid approximately \$3800 for Collins’ Certified Wetland Delineation Report (hereafter Wetland Report) which documented, mapped, photographed, measured and substantiated the existence of three protected Wetlands (two Category 1, and one Category 2) and their respective Buffer Zones.

Sondra Collins ECOS USA is a Natural Resources professional with multiple Wetland Certifications, including by Society of Wetland Scientists Professional Certification Program. <https://www.wetlandcert.org/search.html> Spokane County maintains a list of Qualified Wetland Specialists who meet the Society of Wetland Scientists (SWS) certification as outlined in Spokane County Critical Areas Ordinance. These specialists are approved to perform delineations, reports, and mitigation plans. Collins has been a Spokane County Qualified Wetland Specialist for many years and is again listed (as of October 14, 2025) as a Spokane County Approved Qualified Wetland Specialist. <https://www.spokanecounty.gov/3306/Qualified-Wetland-Specialist-Listing>

Collins’ Wetland Report in fact provides scientifically substantiated, credible, and important new information documenting current Project’s probable significant adverse environmental impact. In particular, the Vernal Pool Wetland identified in Wetland Report as WU-3, was properly observed, mapped, measured, and classified as a Category 2 wetland with a protected 200 ft Buffer Zone which substantially extends onto current Project site. WU-3 wetland supports a medium sized Wet Camas Meadow found entirely on Project site which Collins in fact captured during the very short two-week blooming cycle of Wet Camas which occurs in late spring, after which the flowerets die and are no longer visible. Collins captured this natural phenomenon in early May 2025 and properly

documented and reported it. See *attachments Re WU-3 documentation and map*. Washington's vernal pools are shallow, seasonal wetlands which fill with water in winter and spring but typically dry out by summer. These Category II wetlands and their buffer zones are without question legally protected by SEPA and city codes. *SMC 17E.050, 17E.070.100*. Regulated activities shall not be authorized within a wetland or wetland buffer except where it can be demonstrated that an extraordinary hardship exists, or the impact is both unavoidable and necessary, or that all reasonable economic uses are denied. *SMC 17E.070.120*

City's attempt to replace its prior adoption of Project's SEPA DNS by last minute "exempt status" coupled with its disgraceful plot to discredit, without scientific foundation, Collins' Wetland Report reveals City's panic to avoid its statutory obligation to withdraw Project's adopted SEPA DNS due to Collins' wetland findings: "The City *shall* withdraw a DNS if "there is significant new information indicating a proposal's probable significant adverse environmental impacts." *WAC 197-11-340, SMC 17E.050.110*. Per SEPA rules Department directors and other City agents do not have any legal authority to deviate or exercise discretion. *WAC 197-11-700(3)(a)*.

Additionally, adoption of City's current Project's SEPA DNS requires City to *independently* determine whether SEPA DNS meets environmental review standards, and "*in all cases*" is required to issue new threshold documents. See <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/guide-for-lead-agencies/vising-and-adopting-existing-documents>.

The author of this comment personally submitted via email on July 16, 2025, Collins' entire, voluminous Wetland Report with multiple attachments to various City personnel. On July 25, 2025 Park Planning and Development Manager Nick Hamad emailed Ryan McNair of Ecology Eastern Region Office and stated "*As Drumheller Springs Park is classified as a 'natural land' within city park system, we at Spokane Parks are not proposing any development of this property, though I am aware of development previously proposed on private property near the park. It appears this delineation, if accurate, may impact both the park property and the adjacent private properties (developed or not).*"

City enlisted Ecology to begin its pre-emptive campaign to discredit Collins' Wetland Report. Subsequent emails (obtained by Dennis Flynn on March 6, 2026, via Public Records Request) from McNair to Hamad indicate McNair's "review" was swift, inadequate, and highly dismissive of Collins' Wetland Report. McNair admitted he was *unauthorized to review* the Report as there was no pending project application prompting Ecology review. Which of course reveals the pre-emptive and spurious nature of McNair's "review". McNair made unsubstantiated and conclusory objections to Collins' Wetland Report yet failed to provide any evidence whatsoever of alternative measurements, mapping or specifications of his own. McNair effectively shut down any further consideration of Wetland Report after he was directed ("given guidance") that the Report should not be reviewed any further in email dated August 6, 2025, from McNair to Hamad. At no time did any City or Ecology agent contact Sondra Collins to clarify or explain or defend her Wetland Report.

Notably, neither Ecology nor the City held Applicant's "Ash Place Wetland Issues" letter by Larry Dawes with the same rigor as they do Collins. Dawes' letter contained NO corroborating documentation, photographs, mapping, hydrology, soil, and/or plant data. Dawes' undated letter states he was retained by WCE in September 2024 to perform "wetland reconnaissance" of site. Dawes states he did not identify wetlands on site. This is because Dawes was out of the small window of time (May- June) to properly observe, identify, and measure Vernal Pool Wetland that are apparent only in late spring as did Collins.

Then on March 26, 2026, the same day of City's online posting of current Project application with its new announcement of SEPA exempt status, Dennis Flynn and Jeri Bentley of *Concerned Companions* emailed Mindi Speer of Ecology for information about City's plans to mitigate Project's adopted SEPA DNS as indicated by all public notices to date. The next day, March 27, 2026, Ecology Regional Section Manager Jeremy Sikes City sent an email reply to Flynn and Bentley (Ccd to McNair, Sheer, and City Planner Owen). Sikes stated Ecology is "familiar" with ECO USA Wetland Report but that his program will not intervene on the SEPA in question.

Sikes stated he found the Wetland Report "deeply flawed" while admitting that his subordinate McNair only "spent several hours" reviewing the voluminous and highly technical Wetland Report. Sikes noted McNair conducted "a site visit" (notably which had to occur after July 15, 2025, when WU-3 Vernal Pools are evaporated from mid-summer heat). Sikes asserts McNair's alleged "findings" but provides no alternative data sheets, no measurements, mappings, no site visit date, or other comprehensive, verifiable data—in short, NO scientific evidence whatsoever to substantiate his specious assertions. Sikes admits a second time that McNair's "observations are based only on a "quick site visit" and an "initial" review of Collins' Wetland Report and suggests a "detailed" review is warranted. Yet at no time during the past eight months did McNair or Sikes or any Ecology (or City) agent make any inquiry of Wetland Specialist Sondra Collins regarding her comprehensive and properly documented Wetland Report findings.

Sikes notes Ecology has a legal obligation under RCW 90.48 (Water Pollution Control) to protect all wetlands and buffer zones wherever they exist. State Environmental Protection Act (SEPA) also confers on both Ecology and the City this serious legal obligation. Yet aside from unsubstantiated criticism of Collins' Wetland Report, Sikes neglects to do so. That Sikes insinuates that a Wetland Report commissioned to identify KNOWN Drumheller wetlands and buffer zones is a ploy to "limit the proposed development" reveals his shocking contempt for well-meaning citizens.

It is my hope that this detailed comment will prompt City to re-evaluate its strategy regarding the current Project and fulfil its legal obligation to protect the Wetland and Buffer Zones impacted by this proposed development. It is also my firm belief that the current Project cannot, and will not, withstand administrative or judicial review. Thank you.

Anne Marie Liebhaber  
1803 West Euclid  
Spokane WA

only 0.12 to 1.5 in (3 to 38 mm) depending on time of emergence and collection. The vernal pool fairy shrimp was listed as threatened by the USFWS on September 19, 1994.

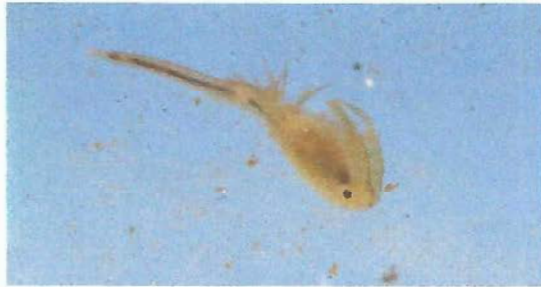


Figure 8: Vernal Pool Fairy Shrimp (*Branchinecta lynchi*). Photo courtesy of the USFWS.

Tadpoles and salamanders have been observed in the same vernal pool as well.

### Soils

Hydric soil is defined as *soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions in the upper part*. In accordance with the methodology, soil samples were taken at all data plots as well as other points on the site. The test of this definition is met when the following indicators of hydric conditions are present: direct observation of flooding, ponding, or surface saturation, thick organic layers, and low soil matrix chromas (chroma of 1 without mottles or chroma of 2 or less and value of 4 or more with mottles). Low chroma soils are indicative of reducing conditions (typically during the growing season when soil oxygen is being utilized by soil microorganisms as well as plants). Mottling occurs in areas of fluctuating water table levels (alternating reducing and oxidizing environments). Soils were moistened during the dry season to accurately determine colors on the Munsell Color Charts. During the dry season, apparent surface indicators of wetland hydrology would be used to assess flooding or ponding. Duration of flooding, ponding, or saturation is also important. Hydric soils must be flooded or ponded for a long (7 to 30 days) or very long (more than 30 days) duration during the growing season. Hydric soils must be saturated in the upper part for a significant period (usually more than one week) during the growing season. The property site soil series unit descriptions and UDSA NRCS National Cooperative Soil Survey "Web Soil Survey" online mapper was prepared on 4/29/2025. These soil series descriptions and maps of the wetland and upland areas are provided in Attachments 3. The Wetland soil series is #3117-"Northstar Rock Outcrop-Rockly Complex-Cocolalla 0-15%

The three wetland units are considered by Cowardin's, December 1979 "Classification of Wetlands and Deepwater Habitats of the United States" and the "Classification of Wetlands and Deepwater Habitats Classification" as follows:

1. Wetland Unit 1, (WU-1) is considered by Cowardin's, 1979 "Wetlands and Deepwater Habitats Classification" as Riverine Intermittent Rock Bottom Bedrock (R4RB1)
2. Wetland Unit 2, (WU-2) is considered as a Palustrine Emergent Persistent Seasonally Flooded (PEM1C) wetland.
3. Wetland Unit 3 (WU-3) is considered a Depressional, Vernal Pools wetland area which is a precipitation based, seasonal wetland.

### **Drumheller Springs Park and Area Vernal Pools, (Wetland Unit-3) Summary**

#### **SC 1.0 Vernal pools**

Vernal pools are precipitation-based, seasonal wetlands. For the purposes of this rating system, they include only scabrock and rainpool vernal wetlands. Pools where surface water ponds for short periods that are found in forested areas, or surrounded by trees and shrubs, are not considered vernal pools in the context of this rating system. Figure 3 shows the typical vernal pools eastern portion of the Drumheller Springs Park area property. This vernal pool area is relatively undisturbed, and in an area where there are at least three other separate aquatic resources (other wetland, rivers, streams, rivers within a 1.5 mile area, and based on special characteristics is considered a Category II, depending on their location in the landscape.

This vernal pool area is less than 4000 ft<sup>2</sup>, and meets **at least two** of the following criteria:

☐ *Its only source of water is rainfall or snowmelt from a small contributing basin and the wetland has no groundwater input.* The wetland will typically lie in areas where the basalt has been exposed by the ice age floods and where the basalts have small depressions that collect rainwater or snowmelt.

☐ *Wetland plants are typically present only in the spring; the summer vegetation is typically upland annuals.* The water is present in the wetland for only short periods of time, usually less than 120 days. Wetland plants will be found only during the time of standing water or immediately afterwards. **NOTE:** If you find perennial, obligate, wetland plants, the wetland is probably NOT a vernal pool.

☐ *The soils in the wetland are shallow (<30 cm or 1 ft deep) and are underlain by an impermeable layer such as basalt or clay.* You can determine the depth of the soil by digging a small hole with a tile spade. Determining if the impermeable layer is basalt should be easy (cannot dig any farther), but identifying a clay layer is harder. You may have to take some of the soil between your fingers, add water, and feel if it is greasy and smooth (without grit). If in doubt, use the "ribbon test" for clay (Appendix C).

☐ *Surface water is present for less than 120 days during the wet season.* Estimating the duration of surface water in a vernal pool wetland is difficult unless one visits the wetland several times and notes

according to the midpoints of their respective cover classes. The midpoints of ranked species are cumulatively summed up to 50 percent of the total for all species when the midpoints are immediately exceeded. All species contributing to the cumulative total plus any species having 20 percent of the total midpoint value are considered dominant. Plant indicator status is then assigned (per Reed 1988, and 1994) to each dominant to determine the percentage of hydrophytes. Vegetation in areas where more than 50 percent of the dominant species are hydrophytes (plant species adapted to saturated conditions, i.e., FAC or wetter) was considered to be hydrophytic. Plant indicator status definitions and a list of vascular plant species identified during the wetland survey on May 15 and June 3, 2025, are provided in Attachments 3 in the "WETLAND DETERMINATION DATA FORMS-Arid West Region".

#### **Vegetation Wetland Unit 1-Drumheller Spring Creek and Artesian Spring**

Drumheller Spring Creek and Artesian Spring (Wetland Unit 1) is considered as the Douglas Fir (*Pseudotsuga menziesii*) /Chokecherry (*Prunus virginiana*) riparian forest habitat type according to the Hansen P. Et al. May 1995. There was approximately 10% bluejoint reedgrass (*Calamagrostis canadensis*) and was the dominant herb stratum. There were 2 Western Red Cedars (*Thuja plicata*) @ 13" (DBH). The upland community is considered by Copper et al., (1991), Ponderosa pine (*Pinus ponderosa*) / Douglas Fir (*Pseudotsuga menziesii*), Idaho fescue (*Festuca idahoensis*) habitat type. Introduced noxious weeds included spotted knapweed and introduced pursalane. A detailed list of other vegetation is provided in Attachments 3 "Wetland Determination DATA FORM-Arid West Region".

#### **Vegetation Wetland Unit 2-Depressional Freshwater Emergent (PEM1C) Wetland**

The Depressional Freshwater Emergent wetland area (Wetland Unit 2) is considered as the Old Growth Mature Pacific Willow/Mesic Forb riparian plant association according to Kovalchik, Bernard L.; Clausnitzer, Rodrick R. 2004. Red Osier Dogwood (*Cornus alba*), Reed Canary Grass (*Phalaris arundinacea*), Foxtail (*Alopecurus pratensis*), and Poison Ivy (*Toxicodendron radicans*) were also identified onsite. The upland community type is considered by Copper et al., (1991), Ponderosa pine (*Pinus ponderosa*) / Douglas Fir (*Pseudotsuga menziesii*), Idaho fescue (*Festuca idahoensis*) habitat type. The Old Growth Mature Pacific willow's onsite is approximately 110 years old.

#### **Vegetation Wetland Unit 3-Vernal Pools Area**

The Vernal Pools wetland area (Wetland Unit 3), is considered as the Camas (*Camassia quamash*) Wet Meadow Plant Association with Sedges species with a combined canopy coverage of <25% or not dominant or "Non Sedge Plant Association" Bluejoint reedgrass (*Calamagrostis canadensis*) and Camas (*Camassia quamash*) >40 percent cover. Camas (*Camassia quamash*) was an essential staple food

EDOS USA PROJECT AREA MAP 5/10/2025  
 ASH PLACE PLACE Spokane County Interactive Map Vie  
 PRELIMINARY LONG PLAT. + Dalton Rd Townhomes

**APPELLANT EXHIBIT 11**



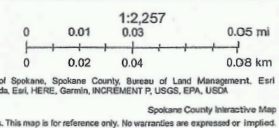
LEGEND: ? No onsite wetland boundary surveyed to date TIBD

3/8/2025, 7:15:40 PM

Project Area	MDR	LDAC	RC
LDR-P	HDR	NC	RC - Development Agreement
LDR	HDR - Development Agreement	CC	MJ
LDR - Development Agreement	Wet Meadow Canals		

NOTES: Sec 1725NR42E

Revised by: SCollins EDOS USA 5/10/2025



Attachment 1

WETLAND DETERMINATION DATA FORM - Arid West Region

Project/Site: WU-3 Drumheller Springs Park City/County: Spoکان, Spokane Sampling Date: 5/15/2025  
 Applicant/Owner: D. Flynn on behalf of Conservancy Companies State: WA Sampling Point: WU-3 Wet 1 Spl  
 Investigator(s): S. Collins Section, Township, Range: Sec. 01 T25N R42E  
 Landform (hillslope, terrace, etc.): 2nd Alluvial terrace Local relief (concave, convex, none): none Slope (%): 0-1%  
 Subregion (LRR): Arid West Scabland E Nat. 467198 N. 5281631 Datum: NAD83 UTM 21N 6m  
 Soil Map Unit Name: S117 Northstar Rock Outcrop-Rocky Amphidacalla NWM classification: Vernal Pool  
 Are climatic/hydrologic conditions on the site typical for this time of year? Yes  No  (If no, explain in Remarks.)  
 Are Vegetation, Soil, or Hydrology significantly disturbed? Yes  No  Are "Normal Circumstances" present? Yes  No   
 Are Vegetation, Soil, or Hydrology naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Is the Sampled Area within a Wetland?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Hydric Soil Present?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Wetland Hydrology Present?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		

Remarks: Wetland Unit 3 is a Vernal Pool Area which is proposed to be disturbed by construction of townhouses @ Liberty/N. Ash P. Junction.

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: <u>30'x30'</u> )	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet:
1. _____				Number of Dominant Species That Are OBL, FACW, or FAC: <u>1</u> (A)
2. _____				Total Number of Dominant Species Across All Strata: <u>1</u> (B)
3. _____				Percent of Dominant Species That Are OBL, FACW, or FAC: <u>100%</u> (A/B)
4. _____				
5. _____				
= Total Cover				
Sandline/Shrub Stratum (Plot size: <u>30'x30'</u> )	Absolute % Cover	Dominant Species?	Indicator Status	Prevalence Index worksheet:
1. <u>Woods Rose</u>	<u>3</u>	<u>N</u>	<u>FACW</u>	Total % Cover of: _____ Multiply by: _____
2. _____				OBL species <u>2</u> x 1 = <u>2</u>
3. _____				FACW species <u>3</u> x 2 = <u>6</u>
4. _____				FAC species <u>7</u> x 3 = <u>3</u> //
5. _____				FACU species <u>4</u> x 4 = <u>16</u>
= Total Cover				UPL species <u>0</u> x 5 = <u>0</u>
= Total Cover				Column Totals: <u>10</u> (A) <u>29</u> (B)
= Total Cover				Prevalence Index = B/A = <u>3</u>
Herb Stratum (Plot size: <u>30'x30'</u> )	Absolute % Cover	Dominant Species?	Indicator Status	Hydrophytic Vegetation Indicators:
1. <u>Samas (Camassia quamash)</u>	<u>40</u>	<u>Y</u>	<u>FACW</u>	<input checked="" type="checkbox"/> Dominance Test is >50%
2. <u>Wild Onion</u>	<u>5</u>	<u>N</u>	<u>FACU</u>	<input checked="" type="checkbox"/> Prevalence Index is >3.0
3. <u>Desert Parsley</u>	<u>5</u>	<u>N</u>	<u>FACW</u>	Morphological Adaptations* (Provide supporting data in Remarks or on a separate sheet)
4. <u>Desert Parsley</u>	<u>5</u>	<u>N</u>	<u>FACU</u>	Problematic Hydrophytic Vegetation* (Explain)
5. <u>Bittersweet</u>	<u>5</u>	<u>N</u>	<u>FACU</u>	
6. <u>Wild Celery</u>	<u>10</u>	<u>N</u>	<u>OBL</u>	
7. <u>Coak Desert Parsley</u>	<u>5</u>	<u>N</u>	<u>OBL</u>	
8. <u>Wild Carrot</u>	<u>5</u>	<u>N</u>	<u>FAC</u>	
9. <u>Tufted Hairgrass (Deschampsia)</u>	<u>35</u>	<u>N</u>	<u>FACU</u>	
= Total Cover				
Woody Vine Stratum (Plot size: <u>30'x30'</u> )	Absolute % Cover	Dominant Species?	Indicator Status	Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
1. _____				
2. _____				
= Total Cover				
Basalt Scabland mounds.	Absolute % Cover	Dominant Species?	Indicator Status	Hydrophytic Vegetation Present?
1. _____	<u>100</u>			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
= Total Cover				
Remarks: <u>Please see "Certified Wetland Report + ATTACHMENTS 3, "Camas Wet Meadow - Vernal Pool Area - WU-3"</u>				

10  
43  
57  
40  
43  
83

VJG/LLB  
805 USM  
4/10/2025



SOIL # 3117 Northstar-Rock Outcrop Rocky-Coolatta 0-5% Slope Sampling Point: WM-3 Wet

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>		
0-1								CFRM Biotic crust
1-3"	10YR3/2							Brown Silt loam Very Dark
3"								Basalt Bedrock Thin Dark Surface

<sup>1</sup>Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. <sup>2</sup>Location: PL=Pure Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

<input type="checkbox"/> Histosol (A1)	<input type="checkbox"/> Sandy Redox (S5)	<input type="checkbox"/> 2 cm Muck (A10)
<input type="checkbox"/> Histic Epipedon (A2)	<input type="checkbox"/> Stripped Matrix (S6)	<input type="checkbox"/> Red Parent Material (TF2)
<input type="checkbox"/> Black Histic (A3)	<input type="checkbox"/> Loamy Mucky Mineral (F1) (except MLRA 1)	<input type="checkbox"/> Very Shallow Dark Surface (TF12)
<input type="checkbox"/> Hydrogen Sulfide (A4)	<input type="checkbox"/> Loamy Gleyed Matrix (F2)	<input type="checkbox"/> Other (Explain in Remarks)
<input checked="" type="checkbox"/> Depleted Below Dark Surface (A11)	<input checked="" type="checkbox"/> Depleted Matrix (F3) (Restrictive Layer Basalt)	
<input type="checkbox"/> Thick Dark Surface (A12)	<input type="checkbox"/> Redox Dark Surface (F6)	Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.
<input type="checkbox"/> Sandy Mucky Mineral (S1)	<input type="checkbox"/> Depleted Dark Surface (F7)	
<input type="checkbox"/> Sandy Gleyed Matrix (S4)	<input type="checkbox"/> Redox Depressions (F8)	

Restrictive Layer (if present):  
 Type: Basalt Bedrock  
 Depth (inches): 0-3"  
 Hydric Soil Present? Yes  No

Remarks:  
 2nd riverine Basalt Terrace Spokane River. Scabland - Vernal Pools Area WM-3.

**HYDROLOGY**

Wetland Hydrology Indicators:

<b>Primary Indicators (minimum of one required; check all that apply)</b>		<b>Secondary Indicators (2 or more required)</b>	
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)	<input type="checkbox"/> Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B)	
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Salt Crust (B11)	<input checked="" type="checkbox"/> Drainage Patterns (B10)	
<input checked="" type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Aquatic Invertebrates (B13)	<input type="checkbox"/> Dry-Season Water Table (C2)	
<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Hydrogen Sulfide Odor (C1)	<input checked="" type="checkbox"/> Saturation Visible on Aerial Imagery (C6)	
<input type="checkbox"/> Sediment Deposits (B2)	<input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3)	<input type="checkbox"/> Geomorphic Position (D2)	
<input type="checkbox"/> Drift Deposits (B5)	<input type="checkbox"/> Presence of Reduced Iron (C4)	<input type="checkbox"/> Shallow Aquitard (D3)	
<input checked="" type="checkbox"/> Algal Mat or Crust (B4) Biotic crust	<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)	<input type="checkbox"/> FAC-Neutral Test (D5)	
<input type="checkbox"/> Iron Deposits (B5)	<input type="checkbox"/> Stunted or Stressed Plants (D1) (LRR A)	<input type="checkbox"/> Raised Ant Mounds (D6) (LRR A)	
<input checked="" type="checkbox"/> Surface Soil Cracks (B6)	<input type="checkbox"/> Other (Explain in Remarks)	<input type="checkbox"/> Frost-Heave Hummocks (D7)	
<input checked="" type="checkbox"/> Inundation Visible on Aerial Imagery (B7)			
<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)			

Field Observations:  
 Surface Water Present? Yes  No  Depth (inches): 0-1"  
 Water Table Present? Yes  No  Depth (inches): 6-1"  
 Saturation Present? Yes  No  Depth (inches): 0-1.5"  
 Wetland Hydrology Present? Yes  No

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:  
 Please Certified Wetland Report + Attachments 3.

WETLAND DETERMINATION DATA FORM - Arid West Region

Project/Site: W11-2 Drumbeller Springs Park City/County: Spokane, Spokane Sampling Date: 5/15/2025  
 Applicant/Owner: D. Flynn on behalf of Concerned Companions State: WA Sampling Point: W11-3 Wet ISR-2  
 Investigator(s): S. Collins + B. Kernaad Section, Township, Range: 01 T25N R42E  
 Landform (hillslope, terrace, etc.): Flat scabland bank Local relief (concave, convex, none): none Slope (%): 0-1%  
 Subregion (LRR): Arid West E Lat: 467212 N Long: 5281590 Datum: NAD83(2011)NAD83(2m)  
 Soil Map Unit Name: S17 Northst. Rock outcrop - Rocky/comp. Coralline NW classification: Depressional  
 Are climatic/hydrologic conditions on the site typical for this time of year? Yes  No  (If no, explain in Remarks)  
 Are Vegetation, Soil, or Hydrology  significantly disturbed? Are "Normal Circumstances" present? Yes  No   
 Are Vegetation, Soil, or Hydrology  naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Is the Sampled Area within a Wetland?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Hydric Soil Present?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Wetland Hydrology Present?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		

Remarks:  
 Long term residences along W Euclid have witnessed lowering depths of South pond after a stormwater drain diversion project w/ City of Spokane. Pers. Com. T. Ray 6/03/2025.

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: 30x30')	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet:
1. Pacific Willow ( <i>Salix lasioandra</i> )	30	Y	FACW	Number of Dominant Species That Are OBL, FACW, or FAC: <u>3</u> (A)
2. (4 Old Growth) >10 yrs old				Total Number of Dominant Species Across All Strata: <u>5</u> (B)
3. Intra. Silver Poplar	3	N	FAC	Percent of Dominant Species That Are OBL, FACW, or FAC: <u>100%</u> (A/B)
4.				
				<b>Prevalence Index worksheet:</b>
Total % Cover of <u>33</u> = Total Cover				
1. Wood Rose ( <i>Rosa woodsii</i> )				Total % Cover of
2. Oregon Grape ( <i>Ribes cereum</i> )				Multiply by:
3. Red Osier Dogwood ( <i>Cornus alba</i> )				OBL species <u>2</u> x1 = <u>2</u>
4. Chokecherry ( <i>Panicum virginica</i> )				FACW species <u>5</u> x2 = <u>10</u>
5.				FAC species <u>2</u> x3 = <u>6</u>
				FACU species <u>5</u> x4 = <u>20</u>
				UPL species <u>1</u> x5 = <u>5</u>
				Column Totals: <u>15</u> (A) <u>43</u> (B)
				Prevalence Index = B/A = <u>2.9</u>
<b>Herb Stratum (Plot size: 30x30')</b>				<b>Hydrophytic Vegetation Indicators:</b>
1. Reed Canary Grass ( <i>Phalaris arundinacea</i> )				<input checked="" type="checkbox"/> Dominance Test is >50%
2. Foxtail ( <i>Alopecurus pratensis</i> )				<input checked="" type="checkbox"/> Prevalence Index is >3.0
3. Camas ( <i>Camassia quamash</i> )				<input type="checkbox"/> Morphological Adaptations <sup>1</sup> (Provide supporting data in Remarks or on a separate sheet)
4. Wild Onion ( <i>Allium vineale</i> )				<input type="checkbox"/> Problematic Hydrophytic Vegetation <sup>1</sup> (Explain)
5. Desert Parsley ( <i>Lomatium nudicaule</i> )				
6. Washoe Desert Parsley				
7. Buttercup ( <i>Ranunculus repens</i> )				
8. Wild Celery ( <i>Lomatium nudicaule</i> )				
9. (Banks Desert Parsley) <i>Lomatium nudicaule</i>				
10. = Total Cover				
<b>Wetland-Vegetation Stratum (Plot size: 30x30')</b>				<b>Hydrophytic Vegetation Present?</b> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
1. Intra Iris ( <i>Iris</i> sp.)				
2. Poison Ivy ( <i>Toxicodendron</i> )				
3. Wild Carrot ( <i>Daucus carota</i> )				
4. = Total Cover				
% Bare Ground in Herb Stratum <u>20</u> % Cover of Biotic Crust <u>0</u>				

Remarks:  
 Fairy Shrimp observed May 2024 by T. Ray + S. Collins on 5/15/2025 in South Pond N5281593 E 467212. 583 m Elev. Please see Certified Wetland Report + All Attachments 3.

S. Collins  
 ECOS USA  
 4/30/2025 + 6/14/2025

**From:** [Becca](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Opposition to Ash Place Unit Lot Subdivision  
**Date:** Wednesday, April 1, 2026 8:17:12 PM

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Becca Lynn  
1816 W Liberty Ave  
Spokane, WA 99205

April 1st, 2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to formally express opposition to the proposed Ash Place Unit Lot Subdivision and to request that all applicable SEPA requirements, environmental regulations, and provisions within the City's Comprehensive Plan be fully upheld throughout the review process.

I am part of the group that funded the Certified Wetland Report prepared by ECOS USA. This report was completed, submitted to the City, and provided to Whipple Consulting Engineers during the December 2, 2025 Community Meeting. Its findings clearly indicate that the proposed 20-unit townhouse development encroaches into a regulated wetland buffer and presents a credible risk of significant environmental impact.

Given the existence of this certified report, it is concerning that reliance appears to be placed on a limited winter reconnaissance (Dawes letter), while the ECOS USA analysis is being minimized or set aside. SEPA requires a comprehensive and objective review of all relevant environmental data. Prioritizing incomplete or less rigorous information over a certified study raises concerns regarding both procedural integrity and compliance.

In addition, the physical realities of the site introduce risks that do not appear to have been fully addressed. Development at this scale will likely require blasting through basalt formations, which carries known risks including ground vibration, potential structural impacts to neighboring properties, and disruption to subsurface water systems. The addition of extensive concrete foundations near a wetland further increases the potential for long-term hydrological changes and environmental degradation.

The site also functions as habitat and a movement corridor for local wildlife, including mule deer and bat populations. These species are particularly vulnerable to noise, vibration, and habitat fragmentation. These impacts should be thoroughly evaluated and disclosed under SEPA, rather than deferred or minimized.

Under WAC 197-11-340(3)(a)(ii), a Determination of Non-Significance must be withdrawn if new information reveals probable significant adverse environmental impacts. The Certified Wetland Report constitutes such information. Any DNS issued without full and documented consideration of this report would raise serious legal concerns.

There are also inconsistencies with the City's Comprehensive Plan. The plan directs higher density development toward designated Centers and Corridors. The density proposed for this site does not appear aligned with those policies and challenges the intent of the City's long-term growth strategy.

Finally, the overall process raises concerns regarding transparency and consistency. It is critical that all decisions reflect established standards and not appear adjusted to support a predetermined outcome. Maintaining public trust requires a process that is both thorough and clearly documented.

Based on the above, I respectfully request the following:

- Full inclusion of the ECOS USA Certified Wetland Report in the official record, with documented evaluation of its findings
- A written explanation for any decision that contradicts or discounts the report's conclusions
- Publication of the December 2, 2025 Community Meeting minutes
- A formal review of the project's consistency with the City's Comprehensive Plan
- Consideration of issuing a Determination of Significance (DS) based on the available data
- Suspension of further project advancement until all environmental, geological, and wildlife impacts have been properly assessed

As it stands, this proposal raises significant environmental, procedural, and policy concerns. Moving forward without full compliance and transparency introduces unnecessary risk to both the City and surrounding community.

I urge a careful, thorough, and fully compliant review moving forward.

Sincerely,  
Becca Lynn

**From:** [Brooke E.V. Nelson](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Concerns Regarding Drumheller Springs Development  
**Date:** Wednesday, April 1, 2026 8:24:56 AM

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Dear Melissa Owen,

Having recently learned of the city's proposal for development of the Ash Place Unit Lot Subdivision (Preliminary Long Plat), I am writing to you to endorse opposition with respect to our natural community spaces.

As a resident of the neighborhood, I have deep and serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

The Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City, identifying wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments. Our natural spaces are an incredible asset to this city that we cannot afford to abandon.

Beyond the removal of natural spaces, imperative drainage systems within Drumheller springs can be impacted both through potential blasting of basalt (impacting subsurface conditions and wildlife), and through increased presence of concrete in the area.

The area is also home to important local wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration, I look forward to your support of our community's unique access and respect for nature.

Sincerely,

Brooke E.V. Nelson, LICSWA

4024 N. Howard Street  
Spokane, WA 99205

Sent April 1, 2026

**From:** [conni.ellern](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Drumheller Springs  
**Date:** Thursday, April 2, 2026 10:10:04 AM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Conni Ellern  
1134 W Glas Ave  
Spokane WA 99205  
4/2/26

TO: Melissa Owen, Senior Planner  
City of Spokane  
808 W Spokane Falls Blvd  
Spokane 99201

Dear Ms Owen

I am writing to formally oppose the Ash Place Unit Lot Subdivision (preliminary long plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological and community impacts of this proposed 20 unit townhouse development.

Please refer to the ECOS USA Certified Wetland Report previously submitted.

Additionally, this is NATIVE LAND. We have no right building on this NATIVE LAND. This negatively impacts increased habitat on this wetland.

Further, this is a sacred place for deer and other creatures that depend on this wetland. Lastly, this area is personally sacred to me. My father, born in 1936, lived on Alice, just a few blocks east of the proposed area. My Dad played in this park, and always referred to it as "Spring Hill". It is a special park with emotional, environmental, historical and geological significance.

PLEASE do NOT consider building here.

Thank you for your time and consideration,

Conni Ellern  
Spokane WA  
Garland District

**From:** [Daniel Hosler](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Certified Wetlands and Density Report  
**Date:** Thursday, April 2, 2026 10:05:34 AM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

04/02/2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Daniel Hosler

**From:** [Darla Greene](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Certified wetlands and Density Report  
**Date:** Wednesday, April 1, 2026 8:56:22 AM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Darla Harryman  
17e4 E Decatur Ave  
Spokane, WA 99108

April 1, 2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Darla Harryman

**From:** [Dennis Flynn](#)  
**To:** [Owen, Melissa](#)  
**Cc:** [Zappone, Zack](#); [Klitzke, Kitty](#); [Wilkerson, Betsy](#)  
**Subject:** Z26-059PPLT: Comment RE "Critical Areas Checklist" document  
**Date:** Wednesday, April 1, 2026 5:43:03 PM

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

CRITICAL AREAS CHECKLIST document deficiencies:

- **"attached sheet" missing:** page 2, question "Are you aware of any environmental studies that have been prepared related to or including the subject property or related to any property located within 300 feet of the subject property? If yes, list titles on an attached sheet.":
  - the "Yes" checkbox is checked but there is no "attached sheet".
  - I would expect an "attached sheet" to list the BSW Dawes letter *and* the Certified Wetland Report from ECOS USA.
- **Certified Wetlands Report missing:** page 2, question "Indicate whether or not the following are potentially located on-site or within 300 feet of the subject property:":
  - this note is superimposed the form: "Per letter from BSW, Inc., wetlands are over 250' from property"
  - no reference to the Certified Wetland Report by ECOS USA, which shows this project will encroach on a wetland buffer zone
  - at the December 2, 2025 Community Meeting, several public comments referenced the Certified Wetlands Report and I handed subsets of the report to agents of Whipple Consulting Engineer
- **"general site topography" missing:** page 2, "Shorelines" section, question "Describe the general site topography. Check all that apply:":
  - "Flat" and "Steep" are checked
  - "Rolling" and "Hilly" checkboxes should also be checked

Regarding the BSW Dawes letter, the Certified Wetlands Report by ECOS USA addresses the letter directly. Between the dashes (---) below is a copy/paste:

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"ECOS USA was contacted by "Concerned Companions of Drumheller Springs Creek on 5/7/2025 by Anne Marie Liebhaber and was retained to complete and deliver a "Certified Wetland Report" as there was no existing and or outdated Certified Wetland Report on file with the City of Spokane Planning Department. There was only a "reconnaissance survey by L. Dawes sometime in September 2024 and March 11, 2025, with a "laser rangefinder". Sometime shortly after a wetland determination letter from L. Dawes was completed. There was not associated mandatory "E. WA Wetland Rating", "WETLAND DETERMINATION DATA FORMS-ARID West Region", NOR ANY DATA FORMS, APPLICABLE FIGURES AND MAPS completed by L. Dawes.

Also L. Dawes time window for wetland reconnaissance was not completed during the short window of time, which for Vernal Pools is from only May 1-June 1, 2025, and typical can be only 14days to delineate vernal pools due to blooming time of native herbs including Common Camas.

L. Dawes did not visit this site area during this short time window. ECOS USA did conduct the Certified wetland survey on May 15 and June 3, "in short window of time", and was able to delineate this Vernal Pool area as a Category II "Based on Special Characteristic" based on the Washington State Department of Ecology "E. WA Wetland Rating Form" which is provided in Attachments 3 as Wetland Unit 3 (WU-3) and requires a 200ft wetland buffer."

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The City Planning Department, the public at large, and those Agencies on the notification list deserve a Critical Areas Checklist that is complete, accurate, and includes the most relevant science that exists in the form of the "Certified Wetland Report".

Thank you for your review of my comment regarding the deficiencies in this Critical Areas Checklist document.

Dennis Flynn  
2108 W Euclid Ave  
Spokane, WA 99205  
Email: dpflynn@hotmail.com  
Cell: 509-385-4747

**From:** [Dennis Flynn](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Re: RFC: Z26-059PPLT – Ash Place Unit Lot Subdivision Preliminary Long Plat – Comments Due April 2, 2026  
**Date:** Friday, March 20, 2026 11:13:32 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Please also add the notes that Whipple was required to record from the community meeting Whipple held at West Central Community Center late last year.

---

**From:** Owen, Melissa <mowen@spokanecity.org>

**Sent:** Thursday, March 19, 2026 9:05 PM

**To:** Abrahamson, Randy <randya@spokanetribe.com>; Adams, Jonathan R.

<jradams@spokanecity.org>; Development Services Center Addressing <eradsca@spokanecity.org>; Allen, Mark V. <mvalien@spokanecity.org>; Allenton, Scotty <sallenton@spokanecity.org>; Tagnani, Angela <atagnani@spokanecity.org>; Averyt, Chris <caveryt@spokanecity.org>; Avista <SpokaneCountyRE@avistacorp.com>; Lori Barlow <lbarlow@spokanevalley.org>; mbasinger <mbasinger@spokanevalley.org>; zbecker <zbecker@cawh.org>; Black, Tirrell <tblack@spokanecity.org>; Brown, Eldon <ebrown@spokanecity.org>; Brown, Rich (Cheney SD Operations) <rbrown@cheneysd.org>; Buller, Dan <dbuller@spokanecity.org>; Carveth, Brenna (County Public Works) <bcarveth@spokanecounty.org>; Chanse, Andrew <achanse@spokanelibrary.org>; Chesney, Scott <schesney@spokanecounty.org>; Chouinard, Sonya <SonyaC@spokaneschools.org>; Coleman, Cindy (SPS) <CindyCo@spokaneschools.org>; Corkins, Karen <karen@s3r3solutions.com>; Cravalho, Justin <jcravalho@spokanecity.org>; Dahl, Lance <idahl@spokanecity.org>; David Moore <David.J.Moore@usace.army.mil>; Deatrich, Kerry <kdeatrich@spokanecity.org>; Dept. of Archaeology and Historic Preservation <sepa@dahp.wa.gov>; Dept. of Ecology Shorelines <EROShorelineNotices@ecy.wa.gov>; Development Review Spokane Transit <developmentreview@spokanetransit.com>; Development Services Center Building Plans Examiner <eradsbpe@spokanecity.org>; DFW <r1planning@dfw.wa.gov>; distrate (dcistrate@spokanecounty.org) <dcistrate@spokanecounty.org>; DNR <sepacenter@dnr.wa.gov>; DNR Aquatics <dnrreaqualeasingrivers@dnr.wa.gov>; Dobson, Harley <hdobson@spokanecity.org>; Eliason, Joelle <jeliason@spokanecity.org>; Engineering Admin <eraea@spokanecity.org>; Fairchild AFB Community Projects <92CES.CEN.CommunityProjCoord@us.af.mil>; Figg, Greg <figgg@wsdot.wa.gov>; Finger, Jeanne <jfinger@spokanecity.org>; Fredrickson, Beryl <bfredrickson@spokanecity.org>; Garcia, Luis <lgarcia@spokanecity.org>; Gardner, Spencer <sgardner@spokanecity.org>; Geiger, Cara <cgeiger@spokanecity.org>; Gennett, Raylene <rgennett@spokanecity.org>; Greene, Barry <BGreene@spokanecounty.org>; Grimm, Kevin <KevinGr@spokaneschools.org>; Hamad, Nicholas <nhamad@spokanecity.org>; Hamlin, Heather <hhamlin@spokanecity.org>; Hanson, Tonilee <sajbinfo@gmail.com>; Harris, Clint E. <ceharris@spokanecity.org>; Hayden, Adam <ahayden@spokanecity.org>; Hayes, Meagan <Meagan.Hayes@ecy.wa.gov>; Heitstuman, Kelly <kheitstuman@spokanecity.org>; Historic Preservation <preservation@spokanecity.org>; Hughes, Rick <rhughes@spokanecity.org>; Jennings, Brian (STA) <BJennings@spokanetransit.com>; Johnson, Erik D. <edjohnson@spokanecity.org>; Johnson, Jeffrey <jeffrey.johnson.64@us.af.mil>; Jones, Garrett <gjones@spokanecity.org>; Jordan,

Jess <dale.j.jordan@usace.army.mil>; Kapaun, Megan <mkapaun@spokanecity.org>; Kasey Wilberding <kwilberding@srhd.org>; Katelyn Scott <katy@spokaneriverkeeper.org>; Kay, Char <kayc@wsdot.wa.gov>; Kincheloe, Melanie <meki461@ecy.wa.gov>; Kuhn, Dalton <dkuhn@spokanecity.org>; Lefors, Terri (SPS) <TerriL@spokaneschools.org>; Limon, Tara <tlimon@spokanetransit.com>; Lisa Corcoran <lcorcoran@spokaneairports.net>; McNair, Ryan (Ecology) <RMCN461@ECY.WA.GOV>; Melissa Alofaituli <Melissa.alofaituli@commerce.wa.gov>; Moore, Michael <michael.s.moore@williams.com>; Moore, Misty D. <mdmoore@spokanecity.org>; Morris, Mike <mmorris@spokanecity.org>; Murphy, Dermott G. <dgmurphy@spokanecity.org>; Neal, Jordan (Spokane County Building) <janeal@spokanecounty.gov>; Neighborhood Services <Neigh.Svcs@SpokaneCity.org>; Neiman, Saegen M <SNeiman@SpokaneCounty.org>; Nilsson, Mike <mnilsson@spokanecity.org>; Note, Inga <inote@spokanecity.org>; Okihara, Gerald <gokihara@spokanecity.org>; O'Sullivan, Colin <cosullivan@spokanecity.org>; Owen, Melissa <mowen@spokanecity.org>; Palmquist, Tami <tpalmquist@spokanecity.org>; Papich, Mark <mpapich@spokanecity.org>; Pflieger, Michael (SPS) <michaelpf@spokaneschools.org>; Picanco, Kevin <kpicanco@spokanecity.org>; Development Services Center Planning Plan Review <eradscppr@spokanecity.org>; Proszek, Richard <rproszek@spokanecity.org>; Public Safety GIS <PUBLICSAFETYGIS@spokanecounty.org>; Quinn-Hurst, Colin <cquinnhurst@spokanecity.org>; Raleigh, Erin <eraleigh@spokanepolice.org>; Victor Ramos <victor.ramos@spokanetribe.com>; Raymond, Amanda <arraymond@bpa.gov>; Reed, Jamie (Cheney SD) <jreed@cheneySD.org>; Ruffing, Jason <jruffing@spokanecity.org>; Ryan Sheehan, COO Spokane Airports <rsheehan@spokaneairports.net>; S, Bonnie <bonnies@inlandpower.com>; Sakamoto, James <jsakamoto@spokanecity.org>; Schulhauser, Travis (SPS Capital Projects) <TravisS@spokaneschools.org>; Spokane Clean Air <PublicComment@SpokaneCleanAir.org>; Spokane County PW <PublicWorksSubmittals@spokanecounty.org>; Spokane County SEPA Review <PlanningSepaReview@spokanecounty.gov>; Spokane Regional Emergency Communications <gis@srec911.org>; SRHD Environmental Resources <envresources@srhd.org>; Staglund, Brandon <bstaglund@spokanecity.org>; Steele, David <dsteale@spokanecity.org>; Ryan Stewart <rstewart@srtc.org>; Studer, Duane <dstuder@spokanecity.org>; Taxes and Licenses <Tax&Licenses@SpokaneCity.org>; Taylor, Joel <jtaylor@spokanecity.org>; Thomas, Jared <jwthomas@spokanecity.org>; htrautman <htrautman@cawh.org>; Washington State Parks <sepa@parks.wa.gov>; Wendle, Ned <ned.wendle@mead354.org>; IT GIS <itgis@spokanecity.org>; Audubon-Downriver Neighborhood Council <audubondownriver@gmail.com>; chair@emersongarfield.org <chair@emersongarfield.org>; vice-chair@emersongarfield.org <vice-chair@emersongarfield.org>; usnavigirl@outlook.com <usnavigirl@outlook.com>; northhillspokane@gmail.com <northhillspokane@gmail.com>; Dennis Flynn <dpflynn@hotmail.com>; Tammi Ray <tammisray@gmail.com>; lgdreams@gmail.com <lgdreams@gmail.com>; gunder1936@gmail.com <gunder1936@gmail.com>; victor FRAZIER <victor.frazier@comcast.net>; Jeri Bentley <jekayb@gmail.com>; khugheypico@gmail.com <khugheypico@gmail.com>; emcooper15@outlook.com <emcooper15@outlook.com>; lexiecooper1011@gmail.com <lexiecooper1011@gmail.com>; s.schermer@myctl.net <s.schermer@myctl.net>; ejtounge@gmail.com <ejtounge@gmail.com>; caeschete@gmail.com <caeschete@gmail.com>; janbake@comcast.net <janbake@comcast.net>; teach4jen@aol.com <teach4jen@aol.com>; marni solheim <msolheim2002@yahoo.com>; phyl2mail@gmail.com <phyl2mail@gmail.com>; Russ Torrison <russtorrison@hotmail.com>

**Cc:** Owen, Melissa <mowen@spokanecity.org>

**Subject:** RFC: Z26-059PPLT – Ash Place Unit Lot Subdivision Preliminary Long Plat – Comments Due April 2, 2026

Good afternoon,

Please find attached the request for comments for the following project:

**Project Name: Ash Place Unit Lot Subdivision Preliminary Long Plat**

**File Number: Z26-059PPLT**

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

**Comments Due: April 2, 2026**

Please note that a substantially similar proposal was reviewed under Z23-587PPLT.

Please also be advised that a cultural resource report was completed under this prior permit (DAHP project tracking 2024-00174).

**Linked documents include:**

Application Materials

[1\\_General Application.pdf](#)

[2\\_Preliminary Long Plat Application.pdf](#)

[3\\_Preliminary Plat Map 1-28-26.pdf](#)

[4\\_Critical Areas Checklist 1-29-26.pdf](#)

[5\\_Narrative.pdf](#)

Technical Documents

[6\\_ash-place-preliminary-long-plat-trip-generation-and-distribution-letter.pdf](#)

[7\\_ash-place-preliminary-long-plat-concept-drainage-report-revised-november-2024.pdf](#)

[8\\_ash-place-preliminary-long-plat-geotechnical-conditions-report.pdf](#)

Other

[9\\_Subdivision Guarantee.pdf](#)

A project page with the linked information above will be available shortly at [Projects - City of Spokane, Washington](#).

**Please direct any questions or comments to Melissa Owen, Senior Planner at [mowen@spokanecity.org](mailto:mowen@spokanecity.org) by Thursday, April 2, 2026, at 5:00 PM.**

**Development Services Center is open Monday, Tuesday, Thursday, and Friday 8 am – 5 pm in person (11 am – 5 pm each Wednesday), [online](#) or over the phone at 509.625.6300!**



Melissa Owen | City of Spokane | Planning & Development Services  
509.625.6063 | [mowen@spokanecity.org](mailto:mowen@spokanecity.org)



**From:** [Dennis Flynn](#)  
**To:** [Owen, Melissa](#)  
**Cc:** [Zappone, Zack](#); [Klitzke, Kitty](#); [Wilkerson, Betsy](#)  
**Subject:** Z26-059PPLT: Comment RE "Narrative Document"  
**Date:** Wednesday, April 1, 2026 5:42:48 PM

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

NARRATIVE document deficiencies:

Many relevant changes were made to Spokane Municipal Code since the March 16, 2023 pre-development meeting. Parts of BOCA were made permanent, street/alley/roadway definitions and naming convention rules were changed, the City Council delegated subsets of their authority to the City Engineer, and several other significant changes across Title 17.

Additionally, my attorney conveyed a Certified Wetlands Report and accompanying appendixes produced by ECOS USA to the City via email, which identifies at least three wetlands in the vicinity of this project, and identifies this project will encroach on the buffer zone of at least one wetland.

As described in WAC 197-11-340(3)(a)(ii), this "significant new information indicating, or on, a proposal's probable significant adverse environmental impacts" requires the City "shall withdraw DNS" that was determined on the previous project (Z23-587PPLT). Whipple Consulting Engineers states "No SEPA review is required as this proposal has an associated DNS dated February 21, 2025", but the requirement the City "shall" withdraw DNS (whether or not any current SEPA exemption is valid) makes WCE's statement an error in fact.

Many members of the public provided testimony about this Certified Wetlands Report at the Community Meeting facilitated by WCE at the West Central Community Center on December 2, 2025. I also provided public testimony at this Community Meeting, as well as handed subsets of the Certified Wetlands Report to WCE agents. Per SMC 17G.061.110(B)(4), "The applicant shall provide a summary of the meeting at the time of submission of the application", including "A digital recording of the meeting proceedings". As of April 1, 2025, no detailed record of this Community Meeting is posted to the project webpage, in violation of SMC 17G.061.110(B)(4).

The changes to the Spokane Municipal Code, the production of a Certified Wetlands Report that identifies encroachment on a wetland buffer zone, and the failure by WCE to meet SMC Community Meeting requirements de facto invalidate the 2023 pre-development meeting, thus the requirement in SMC 17G.080.050(A) "to acquaint the applicant with the applicable provision of this chapter, minimum submission requirements and other plans or regulations, which may impact the proposal" is not met. Since SMC 17G.080.050(A) is not met as a foundational element and since the City is required by WAC 197-11-340(3)(a)(ii) to "shall withdraw DNS", this project therefore is not a "substantially similar proposal" and this project

should be required to fulfill all requirements, including a new pre-development meeting that reviews the "probable significant adverse environmental impacts" this project's encroachment on a wetland buffer will impose, which may subject this project to SEPA.

Thank you for your review of my comment regarding the deficiencies in this Narrative document.

Dennis Flynn  
2108 W Euclid Ave  
Spokane, WA 99205  
Email: dpflynn@hotmail.com  
Cell: 509-385-4747

**From:** [Dennis Flynn](#)  
**To:** [Sikes, Jeremy \(ECY\)](#); [Jeri Bentley](#)  
**Cc:** [McNair, Ryan \(ECY\)](#); [Sheer, Mindi \(ECY\)](#); [Owen, Melissa](#); [Anne Marie Liebhaber](#)  
**Subject:** Re: Ash Place Project  
**Date:** Friday, March 27, 2026 3:20:30 PM

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Thank you for your reply and clarification regarding buffer encroachment authorities.

To be clear regarding this statement you made, "one could surmise that the report was written with a specific objective in mind; identify wetlands in the area that may limit the proposed development.":

After the City of Spokane declined to require a wetland assessment, a group of Concerned Citizens sought out a company to provide an assessment and report. We used the Spokane County webpage (<https://www.spokanecounty.gov/3306/Qualified-Wetland-Specialist-Listing>), contacted several companies, and of the few that responded at all, only ECOS USA was available. We did not ask for a "specific objective" other than to use certified expertise to produce a Certified Wetland Report; we had no other expectations than truth, and *I will look past your insinuation otherwise with an assumption you have good intent.*

I'm sure many of the same bulleted critiques you provide below would also apply to the "Dawes letter" that you may or may not be aware of.

Again, I'm not looking for anything other than truth. I'm very willing to accept another Certified Wetland Report may contradict the ECOS USA report, which would then need a reconciliation of the contradictions.

---

**From:** Sikes, Jeremy (ECY) <JSIK461@ECY.WA.GOV>  
**Sent:** Friday, March 27, 2026 6:48 PM  
**To:** Jeri Bentley <jekayb@gmail.com>; dpflynn@hotmail.com <dpflynn@hotmail.com>  
**Cc:** McNair, Ryan (ECY) <RMCN461@ECY.WA.GOV>; Sheer, Mindi (ECY) <MSHE461@ECY.WA.GOV>; Owen, Melissa <mowen@spokanecity.org>  
**Subject:** RE: Ash Place Project

Good morning, Dennis and Jeri.

I am the Shorelines and Environmental Assistance (SEA) program Section Manager for Ecology here in the Eastern Region. My group deals with wetlands, shorelines and floodplains in the 13 eastern Washington counties. Mindi Sheer, forwarded me messages you had sent concerning the proposed Ash Place project in your neighborhood. Your concerns about potential impacts to Drumheller Springs are appreciated and understandable. My program will not intervene or request lead entity status on the SEPA in question. We are familiar with the ECOS USA report you had created, and found that it is deeply flawed.

Typically, our review of wetland reports is related to permits under our review, and occasionally at

the request of the local jurisdiction. The purpose is to improve or clarify these reports so that permits may be issued. The errors and inconsistencies with wetland delineation procedures in the ECO USA report were so extensive, I asked my staff not to expend more time reviewing it. Even if the report had contained credible evidence of wetland presence near the proposed development, my program would have no permit action to take. Wetland buffers are managed exclusively through the local Critical Areas Ordinance, and buffer encroachment is all the ECOS USA report alleges.

My three wetland and shorelines specialists cover a vast region, from Canada to Oregon. Further review of a flawed report for a project that would not result in permit actions would have been a misuse of their time. That said, Ryan McNair did spend several hours reviewing the ECOS USA report and conducted a site visit. Some of his findings are as follows:

- No delineation data sheets, or descriptions of soils at any plot were provided. Only a rating form. There was no way to verify what caused the consultant to draw a boundary for the wetlands found.
- There are no descriptions of any soil pits. Descriptions (with locations) of soil pits would describe horizons via hue, chroma and value (and/or sometimes texture) to meet a hydric soil indicator. The writing in this document suggests that the generalized NRCS soil survey profile description describes these indicators. It does not.
- Buffers depicted associated with the wetlands are not accurate. They lack uniformity and seemingly subjectively stop at the boundary of some parcels while extending into others.
- “WU-1 wetland boundary Drumheller CR” was flagged/marked in the field. I observed and took pictures of two of the markers. Some of these points were clearly non-wetland. One point was upslope of where the stream started, with no hydrology, no wetland vegetation, and only upland grasses and shrubs.
- The report section on the soils described the two series in the study area as a “wetland series” and an “upland series”. This is not correct. The NRCS web soil survey does not distinguish soils as wetland or upland. Further the soil the report inaccurately lists as a “wetland soil series” describes the depth to bedrock as 26” in locations that the report also identified as vernal pools. It is not possible for both to be true, because vernal pools only present very shallow soils.

#### Map products:

- The “WU-1 250ft creek buffer area” is a polygon outlined in blue with diagonal cross hatches and appears to show the buffer around the small stream. Although the creek runs in a southeasterly direction the buffer abruptly stops at the southern boundary but extends well into the neighboring northern parcels.
- The “PEM 1C WU-2” is a pink line and dot symbol appearing to show the delineated area of a wetland. This delineation does not enclose the supposed wetland and ends abruptly in the north and south.
- The “WU-2 PEMIC 250ft Buffer Area” Is a polygon that is outlined in pink and intersects some red dots ( unlabeled). This polygon appears to roughly follow the line feature of the “PEM 1C WU-2” at a presumably 250ft radius. However, this

buffer extends on both sides of the line feature, and raises the question; how was the buffer measured for the western side if the wetland was not delineated on that extent, and how was the 250ft distance determined?

- The area depicted in the map as vernal pools (“WU-3 Vernal Pools Area”) contains an assortment of different herbaceous plants. These types of vegetation assemblages indicate a depth of soil that is not present in vernal pools. There might be vernal pools in Drumheller Springs park area but they are not present where the report claimed they are.
- The topography of the area depicted by the vernal pool polygon (“WU-3 Vernal Pools Area”) is inconsistent with the type that could harbor vernal pools. Vernal pools in eastern Washington were formed on flat areas of exposed basalt. The area depicted in the delineation encompasses areas with rolling and sloping segments of soil. The vernal pool map polygons seem to have inconsistent boundaries. In some parts they follow the parcel line and other cases they do not.
- “WU-1 wetland boundary Drumheller CR” depicts the small stream that emerges from a spring. This was rated as a wetland. There may be a small area or two of wetland totaling 10 ft <sup>2</sup>, but the rest of the stream lies on basalt bedrock , and therefore, could not be classified as wetland. This feature should be depicted as a type NF stream, not wetland.

These observations are based only a quick site visit, and initial review of the report. A detailed review would likely reveal more issues.

As you can see, we have already expended a great deal of effort reviewing this, and one could surmise that the report was written with a specific objective in mind; identify wetlands in the area that may limit the proposed development. Ecology has an obligation under RCW 90.48 to protect all wetlands wherever they exist. This also obligates us require objective, accurate wetland delineations following standard protocols to inform our work. Please continue to provide your input to the city as the project progresses. I would recommend against relying on the ECOS USA report as a basis for your objections.

*Jeremy Sikes*

*Regional Section Manager*

Shorelands and Environmental Assistance (SEA) Program

Department of Ecology - Eastern Region

4601 N Monroe

Spokane, Washington 99205

Cell- (509) 481-1913

*Please note: This communication is public record and may be subject to disclosure as per the Washington*

State Public Records Act, RCW 42.56.

---

**From:** Sheer, Mindi (ECY) <MSHE461@ECY.WA.GOV>  
**Sent:** Friday, March 27, 2026 8:09 AM  
**To:** Jeri Bentley <jekayb@gmail.com>  
**Cc:** McNair, Ryan (ECY) <RMCN461@ECY.WA.GOV>; Sikes, Jeremy (ECY) <JSIK461@ECY.WA.GOV>  
**Subject:** RE: Ash Place Project

Hi Jen,

Thank you for reaching out. I am cc'ing Ryan McNair and our section lead Jeremy Sikes on this response. Ryan is the specialist who covers City of Spokane permitting. He is on travel today, but

one of them should be able to respond back soon.

Regards,

Mindi

*Mindi Sheer*

Shoreland and Aquatic Resource Specialist  
Shorelands and Environmental Assistance Program  
Department of Ecology | Eastern Region  
4601 N Monroe, Spokane, Washington 99205

Cell 509-601-9546 | [Mindi.Sheer@ecy.wa.gov](mailto:Mindi.Sheer@ecy.wa.gov)

*This communication is a public record and may be subject to disclosure as per the Washington State Public Records Act, RCW 42.56.*

---

**From:** Jeri Bentley <jekayb@gmail.com>  
**Sent:** Thursday, March 26, 2026 8:21 PM  
**To:** Sheer, Mindi (ECY) <MSHE461@ECY.WA.GOV>  
**Subject:** Ash Place Project

External Email

o Hi Ms Sheer

I am a part of a group that paid for a Certified Wetland Report by ECOS USA and that submitted this report to the City. This report was made available to Whipple Consulting Engineers at the December 2, 2025 Community Meeting.

Our Certified Wetland Report is being suppressed while a winter-time spot-survey completed by Dawes is being promoted.

"WAC 197-11-340(3)(a)(ii) Determination of Non-Significance" states: "The lead agency shall withdraw DNS if: There is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts;"

Since the City and the Developer are ignoring our Certified Wetland Report, we ask Ecology to step in as Lead Agency on this project to ensure the wetlands are protected

Thank you for your consideration of this matter,  
Jeri Bentley  
2318 W Liberty Ave  
Spokane. 99205

**From:** [Heidi Montez](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Concern for the wetlands on n ash st  
**Date:** Wednesday, April 1, 2026 1:04:48 PM

---

[CAUTION - EXTERNAL EMAIL - Verify Sender]

1928 w Spofford Ave  
Spokane, WA 99205

April 1, 2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Heidi Montez

**From:** [Helen Goertz](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Certified wetlands and Density report  
**Date:** Thursday, April 2, 2026 4:21:59 PM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Helen Goertz  
2617 N Ash St,  
Spokane, WA 99205

4/2/2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability. This sight is historically significant to the Spokane tribe. It is adjacent to the Chief Spokane Garry School monument.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Helen Goertz



**From:** [Isaac Harmson](#)  
**To:** [Owen, Melissa](#)  
**Date:** Wednesday, April 1, 2026 9:13:52 PM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Isaac Harmson

**From:** [Jaime E](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Drumheller springs- Certified wetland and density report  
**Date:** Wednesday, April 1, 2026 7:57:10 AM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Jaime Koedding  
2915 W Eloika  
Spokane, WA 99205

April 1st, 2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Jaime Koedding  
Lifelong resident and Concerned Citizen

Sent via the Samsung Galaxy S24 Ultra, an AT&T 5G smartphone  
Get [Outlook for Android](#)

**From:** [JANICE BAKER](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Re: RFC: Z26-059PPLT – Ash Place Unit Lot Subdivision Preliminary Long Plat – Comments Due April 2, 2026  
**Date:** Wednesday, March 25, 2026 2:49:31 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Hello Melissa---I'm assuming the City will go ahead with this development project regardless of neighbor comments but, thank you for asking!!!  
If the project continues, I would hope there is enough space for an adequate BUFFER ZONE between the Natural Reserve and the apartments?? 200 feet minimum would be a reasonable suggestion. I was hoping that fewer apartments might be required but it appears that is not the case.

It is impossible for that large a complex to not have trash, loose wrappers of all kinds, noise and exhaust pollution et. that will carry over into the Reserve. Most of the wildlife on that east side will disappear and exhaust pollution will eventually harm existing native Willows, Conifers and wild flowers especially with our worsening climate change.

The increased crowding, exhaust and damage to narrow residential streets is another matter.

Thank you again for his comment period. Jan Baker & family on W. Liberty Ave.

On 03/19/2026 2:05 PM PDT Owen, Melissa <[mowen@spokanecity.org](mailto:mowen@spokanecity.org)> wrote:

Good afternoon,

Please find attached the request for comments for the following project:

**Project Name: Ash Place Unit Lot Subdivision Preliminary Long Plat**

**File Number: Z26-059PPLT**

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

**Comments Due: April 2, 2026**

Please note that a substantially similar proposal was reviewed under Z23-587PPLT.

Please also be advised that a cultural resource report was completed under this prior permit (DAHP project tracking 2024-00174).

**Linked documents include:**

Application Materials

- [1\\_General Application.pdf](#)
- [2\\_Preliminary Long Plat Application.pdf](#)
- [3\\_Preliminary Plat Map 1-28-26.pdf](#)
- [4\\_Critical Areas Checklist 1-29-26.pdf](#)
- [5\\_Narrative.pdf](#)

Technical Documents

- [6\\_ash-place-preliminary-long-plat-trip-generation-and-distribution-letter.pdf](#)
- [7\\_ash-place-preliminary-long-plat-concept-drainage-report-revised-november-2024.pdf](#)
- [8\\_ash-place-preliminary-long-plat-geotechnical-conditions-report.pdf](#)

Other

- [9\\_Subdivision Guarantee.pdf](#)

A project page with the linked information above will be available shortly at [Projects - City of Spokane, Washington](#).

**Please direct any questions or comments to Melissa Owen, Senior Planner at [mowen@spokanecity.org](mailto:mowen@spokanecity.org) by Thursday, April 2, 2026, at 5:00 PM.**

**Development Services Center is open Monday, Tuesday, Thursday, and Friday 8 am – 5 pm in person (11 am – 5 pm each Wednesday), [online](#) or over the phone at 509.625.6300!**



Melissa Owen | City of Spokane | Planning & Development Services

509.625.6063 | [mowen@spokanecity.org](mailto:mowen@spokanecity.org)

 FIND US

 LIKE US

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**From:** [Jeri Bentley](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Ash Place project  
**Date:** Thursday, March 26, 2026 8:13:59 PM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

- Hi Ms. Owen

I am writing concerning the Ash Place project

I am a part of the group that paid for the Certified Wetland Report produced by ECOS USA. The full report was submitted to the City. It is clear that this project "encroaches on the wetland buffer zone". I believe Whipple is ignoring the science provided in the Certified Wetland Report, but includes the unscientific Dawes letter.

I attended the December 2, 2025 Community Meeting, and heard several people publicly testify about the Certified Wetland Report provided by ECOS USA. When will the minutes of this Community Meeting be posted to the project website?

In addition the Comprehensive Plan of the City specifies higher density near Centers and Corridors and lower density the farther away you get from Centers and Corridors. This high density project is very far away from any Center or Corridor, which violates the Comprehensive Plan.

There are many other reasons that this project should not be given a green light for moving ahead not the least of which is it being a key place in the history of the Spokane Tribe. Also the worth of protecting the Park as a treasure in the City with the wildlife, flora, and natural spring which could easily be destroyed. I hope this will be treated in the best interest of all of Spokane.

The need for housing can certainly be met in locations far better than this.

Thank you for your consideration in this matter,  
Jeri Bentley  
2318 W Liberty Ave

Sent from my iPad

**From:** [Jess Asien](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Drumheller Springs  
**Date:** Wednesday, April 1, 2026 1:00:21 PM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely, Jessica Asien  
1507 W Jackson Ave.  
Spokane, Wa 99205

**From:** [joseph shields](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Formal Opposition – Ash Place Unit Lot Subdivision (Preliminary Long Plat)  
**Date:** Tuesday, March 31, 2026 6:04:08 AM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Joseph E. Shields  
1816 W Liberty Ave  
Spokane, WA 99205

March 29, 2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat) and to request strict adherence to SEPA requirements, applicable environmental regulations, and the City's Comprehensive Plan.

I am part of the group that funded the Certified Wetland Report prepared by ECOS USA. This report was completed, submitted to the City, and made available to Whipple Consulting Engineers during the December 2, 2025 Community Meeting. Its findings indicate that the proposed 20-unit townhouse development encroaches into a regulated wetland buffer and presents a probable risk of significant adverse environmental impacts.

Despite the existence of this certified analysis, it appears that the City and/or project proponents are relying on a limited winter-time reconnaissance (Dawes letter) while minimizing or disregarding the ECOS USA report. This raises serious concerns regarding compliance with SEPA, which requires full and objective consideration of all relevant environmental information. Selective reliance on incomplete or less rigorous data creates both procedural deficiencies and potential legal exposure.

In addition, the physical conditions of the site introduce substantial risk factors that have not been adequately evaluated. Development of this scale will require blasting of underlying basalt formations. Blasting activities are known to create ground vibration, potential structural impacts to adjacent properties, and disruption to subsurface hydrology. The installation of extensive concrete foundations in proximity to a wetland system further increases the likelihood of long-term hydrological alteration and environmental degradation.

The site also provides habitat and movement corridors for local wildlife, including mule deer and bat populations. These species are particularly sensitive to noise,

vibration, and habitat fragmentation. These impacts must be fully evaluated and disclosed under SEPA, rather than minimized or deferred.

Under WAC 197-11-340(3)(a)(ii), a Determination of Non-Significance (DNS) must be withdrawn when new information indicates probable significant adverse environmental impacts. The Certified Wetland Report constitutes such information. Any DNS issued without full consideration of this report would be subject to serious legal challenge.

Furthermore, the proposal appears inconsistent with the City's Comprehensive Plan, which directs higher density development toward designated Centers and Corridors. The proposed density at this location does not align with those policies and undermines the intent of the adopted growth strategy.

The sequence of events surrounding this project also raises concerns regarding procedural consistency and transparency. Any appearance that standards are being adjusted to accommodate a specific outcome erodes public trust and exposes the process to challenge.

Given these concerns, I respectfully request the following:

- Full incorporation of the Certified Wetland Report (ECOS USA) into the official record, with documented consideration
- A written explanation detailing any decision to discount or override the findings of that report
- Immediate publication of the December 2, 2025 Community Meeting minutes
- Re-evaluation of the project's consistency with the Comprehensive Plan
- Consideration of issuance of a Determination of Significance (DS) based on the available evidence
- Suspension of further advancement of the project until all environmental, geological, and wildlife impacts are fully evaluated

This proposal, as currently presented, raises substantial environmental, procedural, and policy concerns. Advancing it without full compliance and transparency exposes the City to unnecessary legal and environmental risk.

I urge the City to proceed with diligence, integrity, and full adherence to governing regulations.

Sincerely,

Joseph E. Shields

**From:** [kwardell](#)  
**To:** [Owen, Melissa](#)  
**Date:** Wednesday, March 25, 2026 9:56:42 AM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Hello Melissa,

Please accept my input against the Drumheller Springs Ash Place development. I can't understand why the City of Spokane, a city known for keeping such nice parks would like to devalue the park and upset current neighbors and visitors to this natural reserve.

It is a peaceful, clean and vibrant little respite from the noise of all the one way streets (Ash, Alberta, Maple) that run north to south near it. There are many types of wildlife and plants as well as nice well established trails to walk.

If 20 (or more?) new residences of high density are placed here it will be a huge frustration and likely result in much more traffic, stressing our already crumbling and patched streets in the neighborhood, the wildlife, as well as the noise and uncertainty of how the park will be used by newcomers. Also, are these proposed buildings going to be oriented with windows facing into the park, I assume? That will remove a essentially all of the solitude and privacy from the park that many walkers enjoy very much. It's as if these multiple units don't fit the neighborhood but are instead being forced upon a small park setting. This will give no benefit to we neighbors, instead it will cause much discord.

Please take these issues into consideration. Thank you for your time.

Kristie Wardell

**From:** [Kai](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Drumheller  
**Date:** Monday, April 6, 2026 5:43:03 PM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Kaiulani Swan  
3304 N Milton St  
Spokane, WA 99205

April 6, 2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident an adjoining neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development as well as other proposed developments around Spokane that threaten safety, increase traffic to areas that can't handle it, and that do not take into consideration what makes neighborhoods special and unique. I hope the Spokane planning department feels it is within their power to deny projects that will dramatically alter our wild spaces. When a city plans well and protects these spaces, it positively affects generation after generation.

We've all seen city planning done poorly and I hope Spokane can be an example to other cities of what they can strive for. That we place importance on the intangible and don't allow developers to do whatever they want with few restrictions.

We have a push for housing density in Spokane, which is needed and desired by most residents, including myself. My hope is that it is done thoughtfully and safely and takes into account the history of Spokane, the affected neighbors, the long-term effects of development, and—as a priority—the environment.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed
- A public review period with a chance for citizens to express our concerns and be heard

Thank you for your time and consideration, and for not allowing developers to have all of the power in how Spokane will continue to thoughtfully grow.

Warmly,

Kaiulani Swan

**From:** [Katie Leonardich](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Certified wetlands proposed building Drumheller Park, Spokane, Washington, Northside  
**Date:** Sunday, April 5, 2026 9:48:41 AM

---

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Katie Leonardich  
2409 w Walton ave  
Spokane, WA 99205

Sunday April 5th

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

★ ★ ★ SAVE Drumheller, there are so many other vacant lots that make Spokane look terrible-build cheap townhomes on those. Please save this park my children and I use it frequently.

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

[Your Name]

**From:** [Kirsten Angell](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Drumheller Springs  
**Date:** Thursday, April 2, 2026 3:31:32 PM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the Audubon/Downriver neighborhood and I walk and bring my family to enjoy Drumheller Springs. I have serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Kirsten Angell  
Spokane Resident

**From:** [Jennings, Lindsey](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Drumheller Springs  
**Date:** Thursday, April 2, 2026 4:47:06 PM

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Lindsey Jennings

3003 W Hoffman Ave

Spokane WA 99205

**From:** [Lisa Waddle](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Certified wetlands and Density Report  
**Date:** Wednesday, April 1, 2026 3:37:18 PM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Dear Ms. Owen,

I am writing to oppose the Ash Place Unit Lot Subdivision.

I am a resident of the Audubon neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the city to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also presents risks to drainage and long-term environmental stability.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the city's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action is taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Lisa Waddle

3211 W Cora Ave, Spokane WA 99205

Explore my art or yoga classes at [www.lisawaddle.com/](http://www.lisawaddle.com/)

**From:** [Lydia Duffy](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Certified wetlands and Density Report  
**Date:** Wednesday, April 1, 2026 10:08:25 PM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

1522 W Courtland Ave  
Spokane, WA 99205

April 1, 2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

As a family, we bike and walk Drumhiller Springs all year long.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Lydia Duffy

March 31, 2026

Melissa Owen, Senior Planner  
808 W. Spokane Falls Blvd  
Spokane, WA 99201

Subject: Opposition to the Ash Place Project Adjacent to Drumheller Springs Natural Area

Dear Ms. Owen:

I am writing to formally express my strong opposition to the proposed Ash Place project.

Drumheller Springs Natural Area is one of the few remaining wetland ecosystems in Spokane County. As you know, wetlands are extremely valuable natural resources that support wildlife habitat, improve water quality, reduce flooding, and contribute to the ecological health of the region. Once damaged, they are extremely difficult—or impossible—to restore to their original condition.

In addition to its environmental importance, Drumheller Springs is also culturally and historically significant. The area has long been recognized as sacred Indigenous land and was historically used as a gathering and teaching place. A monument at the site denotes the location of the first school established by Chief Spokane Garry, further emphasizing the historical and cultural importance of this land.

Approving a development project immediately next to a protected wetland and sacred site raises serious concerns about environmental impact, stormwater runoff, noise, light pollution, and long-term degradation of the park and surrounding habitat.

I would like to know whether the information and data our group paid approximately \$4,000.00 to obtain a Certified Wetland Report by ECOS USA was considered when your decision was made to permit this project. Given the environmental sensitivity of wetlands and the cultural significance of Drumheller Springs, it is critical that all environmental review requirements and public interest considerations are fully met. Would you kindly let me know if this report was included in your decision-making process?

I respectfully ask that you carefully re-evaluate the Ash Place project, its proximity to this wetland, and prioritize the protection of Drumheller Springs Natural Park. Again, please consider not only the environmental issues but also the cultural and historical significance of this area before making any recommendations or decisions regarding the Ash Place project. I respectfully request that the City reconsider approval of the Ash Place project until all environmental, cultural, and historical impacts have been fully reviewed and publicly addressed.

Thank you for your time and thoughtful consideration.

Sincerely,



Marlene Torrison

CC: Mindi Sheer, Department of Ecology

**From:** [Marlene Torrison](#)  
**To:** [Owen, Melissa](#)  
**Subject:** The "Ash Place Project"  
**Date:** Thursday, April 2, 2026 4:56:33 PM  
**Attachments:** [Document1.docx](#)

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello Melissa

Please give my concerns about 20 units called the Ash Place Project serious consideration. Attached are are some of the environmental and culteral issues that disturb me.

Sincere thanks! Marlene Torrison

**From:** [marni.solheim](#)  
**To:** [Owen, Melissa](#)  
**Cc:** [Dennis Flynn](#)  
**Subject:** Re: RFC: Z26-059PPLT – Ash Place Unit Lot Subdivision Preliminary Long Plat – Comments Due April 2, 2026  
**Date:** Thursday, April 2, 2026 9:09:44 AM  
**Attachments:** [AshPlace20260402.pdf](#)  
[image004.png](#)  
[image003.png](#)  
[image002.png](#)

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Please see attached comments.

On Thursday, March 19, 2026 at 02:07:10 PM PDT, Owen, Melissa <mowen@spokanecity.org> wrote:

Good afternoon,

Please find attached the request for comments for the following project:

**Project Name: Ash Place Unit Lot Subdivision Preliminary Long Plat**

**File Number: Z26-059PPLT**

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

**Comments Due: April 2, 2026**

Please note that a substantially similar proposal was reviewed under Z23-587PPLT.

Please also be advised that a cultural resource report was completed under this prior permit (DAHP project tracking 2024-00174).

**Linked documents include:**

Application Materials

[1\\_General Application.pdf](#)

[2\\_Preliminary Long Plat Application.pdf](#)

[3\\_Preliminary Plat Map 1-28-26.pdf](#)

[4\\_Critical Areas Checklist 1-29-26.pdf](#)

[5\\_Narrative.pdf](#)

Technical Documents

[6\\_ash-place-preliminary-long-plat-trip-generation-and-distribution-letter.pdf](#)

[7\\_ash-place-preliminary-long-plat-concept-drainage-report-revised-november-2024.pdf](#)

[8\\_ash-place-preliminary-long-plat-geotechnical-conditions-report.pdf](#)

Other

[9\\_Subdivision Guarantee.pdf](#)

A project page with the linked information above will be available shortly at [Projects - City of Spokane, Washington](#).

**Please direct any questions or comments to Melissa Owen, Senior Planner at [mowen@spokanecity.org](mailto:mowen@spokanecity.org) by Thursday, April 2, 2026, at 5:00 PM.**

Development Services Center is open Monday, Tuesday, Thursday, and Friday 8 am – 5 pm in person (11 am – 5 pm each Wednesday), [online](#) or over the phone at 509.625.6300!



**Melissa Owen** | City of Spokane | Planning & Development Services  
509.625.6063 | [mowen@spokanecity.org](mailto:mowen@spokanecity.org)



Thank you for this opportunity to comment on the proposed Ash Place Development. I live beyond the proposed development on a dead-end street. Along with well over 100 other neighbors in this quiet and unique neighborhood, I write opposing a project of this size. My reasons for opposition are as follows:

#### Violations of Spokane Municipal Code

1. These townhomes are for high-middle- and high-income earners. The developer is not proposing any affordable housing. The relaxed zoning is merely allowing this developer to profit immensely while doing nothing to assist with the affordable housing problems that is the rationale behind zoning changes. This proposal is also completely out of character for this single home residential neighborhood. Please see review of comprehensive plan violations at the end of my comments.

The fact that these are not affordable, nor are they in character with the neighborhood appears to violate provisions of Ordinance No. C36459. This Ordinance references “affordable housing” three times as the reason for zoning changes, and also states in the opening rationale that “the housing it will allow are compatible with the City’s residential neighborhoods.” A development of this size and density in a single-family neighborhood offering no affordable housing goes against the spirit and intent behind relaxed zoning codes.

A similar dense development is also in the works directly across the street and in Drumheller Springs Park from the Ash Place proposal, which would further exacerbate all the problems development of this size will cause.

2. I am uncertain what code may apply, but it is safe to assume access by essential services need to be provided in any development. In this case, it does not appear that trash, recyclable material, and organics collection vehicles will be able to easily service each townhome, requiring trucks to back out of the alley multiple times onto Ash Place. They will need to back in as well to empty carts at all residences on the north, south, east and west sides of the alley. There is inadequate turnaround space for this in the alley. The same would apply to large delivery vehicles and moving trucks. Backing out of this development by the many large vehicles needed to service the townhomes puts residents, pedestrians, and wildlife at risk to life and vehicular accidents.
3. I am concerned about recharge to the wetlands across the street in Drumheller Springs Park from the damage that will be caused by blasting and disrupting existing stormwater flows through cracked basalt.

#### Other Concerns

1. The project is across the street from Drumheller Conservation Area. The increased traffic, people, noise, lighting and pollution threatens wildlife it provides habitat for. One of the species we see daily in our yards and in Drumheller are herds of Rocky Mountain Mule Deer. These deer are priority species in the Spokane County Critical Areas Ordinance. Along with raccoons, skunk, migrating waterfowl, and many other species we are privileged to have as neighbors, special protections are warranted.

The Critical Areas Ordinance allows increased buffers to protect wetlands used by protected species. It also allows protections for open space that provides priority habitat, serves as a wildlife corridor connecting to other habitats, are game breeding areas, and migration corridors. Drumheller meets all of these criteria.

There are three wetlands within Drumheller, all in close proximity to this project. The impact to groundwater flow from blasting to occur on the site is unknown. Disruption of groundwater and stormwater flow that feeds the wetlands needs to be prevented or limited.

Drumheller is a historically important area to the Spokane Tribe and provides significant ecological function. More people, especially at the proposed density of this project, threatens the continued function of this place. The developer proposes no energy efficiency standards or water saving features, despite building for solely high-middle- and high-income earners. They are not proposing use of electricity for heating, efficient heat pumps, instant hot water systems, solar panels or battery storage. Natural gas should not be an option for the townhomes. The City and state and world are trying to transition away from use of fossil fuels and continuing to build it into homes and businesses. It is impossible to use solar panels for home heating as an option when natural gas is the heat source built into buildings, water heaters and stoves.

2. For carbon storage, aesthetics, shade, stormwater absorption, etc., the developer should be required to keep the mature vegetation growing on the east side of the lots where no building will occur. There is mature vegetation that took decades to establish, particularly on the dry basalt atop which they established.
3. My home is past this proposal and on a dead-end street. The only way out is past this development. I am concerned about being able to get out in case of an emergency such as a fire. 20 townhomes housing potentially 60 people or more come with a lot of traffic. Being clustered in one spot could lead to gridlock should a fire, for example, occur in Drumheller Springs Park and threaten surrounding homes. I worry too about the ability of fire trucks to get to the hydrant directly across the street from my house, as such emergency responders would need to first get past this dense development where residents there may also be evacuating. A similar dense development is also proposed for parcels directly across the street from this proposal, further elevating concerns about the ability to evacuate in case of fire or other emergency.
4. Traffic into and out of the streets around Drumheller Springs will be an issue. There are very limited means to access Ash, and travel north to or west requires using what should be quiet residential streets that are not arterials. Liberty and Oak are such streets and the residents there will face a huge increase in traffic to fulfill the needs of those living in this development. More accidents will occur at the uncontrolled intersections that take people several blocks north on Oak to access Garland, or several blocks west on Liberty to access Cochrane and Alberta. This increase in traffic also puts kids, the many pedestrians walking their dogs and area wildlife at greater risk of getting hit.

5. I recommend the City require external lighting for this project to direct light downward to prevent light pollution and impacts to adjacent residents, as well as be motion sensor lighting to prevent unnecessary lighting when no one needs it.
6. The houses to the north and south of this development will be on either side of the alley at the proposed development, where vehicle traffic compromises the privacy of these homes. Barriers, such as walls on the north and south sides, should be required to ensure those home are protected from lights and noise, and some privacy is maintained.
7. To limit use of water, drought tolerant and native landscaping should be required given our persistent drought conditions that exist now and to be expected for the future to protect the limited supply in our sole source aquifer.
8. Lastly, I want to describe the unique attributes of Drumheller Springs Park and the homes surrounding it. We have resident deer that take refuge in the park and in our yards. We get moose in the park. Waterfowl rely on the wetlands in the park that provide a resting place during their migration. Skunks reside here. A turkey has been hanging out in my yard, a first for sighting one. There has been the occasional racoon family spotted. The park's vegetation is historically important to tribes as it is home to yarrow and other native species. All can agree that more people and more traffic is not attractive to such wildlife, and increased numbers of people and pets using the parks threatens the native plant life that is so well established there.

In sum, a decision to allow this type of dense development will forever and irreversibly negatively impact this special and quiet neighborhood and pose a real risk to residents in the area. Me and others impacted by this proposal feel strongly and for legal and other legitimate reasons that it be decreased substantially, or altered altogether to build affordable, single-family homes or townhomes.

Please trust the impacts neighbors in the area know will occur. We know the area best and look out for each other and all the beings that frequent this unique and special place we cherish and call home. Thank you.

Marni Solheim  
1711 W. Euclid Ave  
Spokane, WA 99205  
[msolheim2002@yahoo.com](mailto:msolheim2002@yahoo.com)  
509-981-3759

#### City of Spokane Comp Plan Violations

Page 3-8:

LU 1.3 Single-Family Residential Areas Protect the character of single-family residential neighborhoods by focusing higher intensity land uses in designated Centers and Corridors.

Discussion: The city's residential neighborhoods are one of its most valuable assets. They are worthy of protection from the intrusion of incompatible land uses. Centers and Corridors provide opportunities for complementary types of development and a greater diversity of residential

densities. Complementary types of development may include places for neighborhood residents to work, shop, eat, and recreate. Development of these uses in a manner that avoids negative impacts to surroundings is essential. Creative mechanisms, including design standards, must be implemented to address these impacts so that potential conflicts are avoided

#### LU 1.4 Higher Density Residential Uses

Direct new higher density residential uses to Centers and Corridors designated on the Land Use Plan Map.

Discussion: Higher density housing of various types is the critical component of a center. Without substantially increasing population in a center's immediate vicinity, there is insufficient market demand for goods and services at a level to sustain neighborhood-scale businesses. Higher density residential uses in Centers range from multi-story condominiums and apartments in the middle to small-lot homes at the edge. Other possible housing types include townhouses, garden apartments, and housing over retail space.

To ensure that the market for higher density residential use is directed to Centers, future higher density housing generally is limited in other areas. The infill of Residential 15+ and Residential 15-30 residential designations located outside Centers are confined to the boundaries of existing multi-family residential designations where the existing use of land is predominantly higher density residential

Page 3-18:

Businesses in the Neighborhood Center are provided support by including housing over ground floor retail and office uses. The highest density housing should be focused in and around the Neighborhood Center. Density is high enough to enable frequent transit service to a Neighborhood Center and to sustain neighborhood businesses. Housing density should decrease as the distance from the Neighborhood Center increases. Urban design guidelines for Centers and Corridors, located in the Spokane Municipal Code, are used to guide architectural and site design to promote compatible, mixed land uses, and to promote land use compatibility with adjoining neighborhoods.

Page 3-22:

Discussion: The Comprehensive Plan recognizes that Centers and Corridors are the most appropriate location for commercial and higher density residential uses. In some areas of the city, there may be a need to designate a new Center or Corridor. The exact location, boundaries, size, and mix of land uses in a Center or Corridor should be determined through a city-approved sub-area planning process that is inclusive of all interested stakeholders, including business and property owners, and the affected neighborhood(s). This process may be initiated by the city, or at the request of a neighborhood or private interest.

#### Parking

Page 3-27:

Discussion: Off-street parking, access, and loading facilities are usually associated

with the development of higher density residential, office, and commercial uses. These features often have major impacts on single-family residential areas. The impacts are most significant when these facilities are next to or intrude between homes. When these facilities are accessory to a higher density residential or nonresidential use, they should be developed according to the same policies and zoning regulations as govern the primary use. New parking lots should also have the same zoning classification as the primary use. In addition, these facilities should be developed to minimize adverse impacts to adjacent properties. All parking lots should be paved. Parking lots and loading areas should have appropriate buffers to fully screen them from adjacent, less intensive uses. Access to business and higher density residential sites should be controlled to avoid impacts on adjacent uses, pedestrian movement, and street functions.

Page 8-10:

Discussion: Infill construction can benefit the community when done in a manner that improves and does not detract from the livability of the neighborhood and the desirable design character of the area.

To ensure more affordable housing, a developer proposing to develop middle, high-middle, and high income housing be required to include 30% of units that meet the affordable housing price. The city's decrease density restrictions is allowing large developments without any affordable units required. This is in direct conflict with the city's acknowledged need for more affordable housing, which also is its justification for relaxed zoning.

**From:** [nancy.huck](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Comments on proposed building site  
**Date:** Wednesday, April 1, 2026 10:37:08 AM

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Nancy Huck  
2338 W. Courland Ave  
Spokane WA 99205

April 1, 1026

Melissa Owen  
City of Spokane

Dear Mrs. Ownes

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Platt). Because something can be built, doesn't mean it should be, or that it is in the best interest of the people and land involved. I agree we need to make better use of the land, but there is a point of overkill, and money speaking louder than good sense. Six houses on three lots reasonable, twenty no, and the surrounding infrastrucuter needs to be improved in either case.

A certified Wetland Report prepared by ECOS USA has been completed and submitted to the city. The report identifies wetland buffer concerns and potential environmental impacts. I urge the City to fully consider this report in the review process and not rely solely on limited or seasonal assesappears to require blasting of basalt, raising concerns about vibration and potential damage to nearby properties and dissments. This project of natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also presents risks to drainage and long-term environmental stability.

The area is home, because of the conservation area across the street to the proposed building, to wildlife including mule deer and bats, which will be negatively impacted by the increased density, noise and habitat disruption.

I am concerned that the proposed density does not align with the intent of the City's Comprehensive Plan. Is there any residential block where 20 new houses and potentially forty cars, with the noise,traffic and parking problems involved, wouldn't be negatively impacted. The traffic is of increased importance in this area as Ash Place is a dead end road. Yes, a fire truck can get in, but not if thirty plus cars are coming the other way.

Courtland and LIberty streets are falling apart, this addtional load on the existing infastructure will be devasating, and the residents of Ash Place have no choice but to use these streets. The area already has more accidents than usually at the junction of these streets and Nettleton. And trying

to get on of off the one-way streets, Maple and Ash is already difficult.

With these concerns in mind, I respectfully request:

Full consideration of the Wetland Report in the official record.

Careful evaluation of the environmental and geological risks.

A thorough review and repair of the infrastructure in and surrounding this area.

Consider whether a Determination of Significance (DS) is needed.

That no further action be taken until all impacts are fully and transparently reviewed.

And a personnel note: Townhouses in an area of ranchers and bungalows, how is that in keeping with the neighborhood?

Thank you for taking time to consider the above.

Sincerely,

Nancy Huck

**From:** [Nicole Brianna](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Certified wetlands and Density Report  
**Date:** Wednesday, April 1, 2026 4:20:56 PM

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

6311 N Winston Dr.  
Spokane, WA 99208

April 1, 2026

To:  
Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted

- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Nicole Shek

**From:** [NOLA HANSEN](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Certified wetlands and Density Report  
**Date:** Thursday, April 9, 2026 10:43:21 PM

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

6220 North Cook Street  
Spokane, WA 99208

April 9, 2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the city and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

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The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Nola Hansen

Sent from my iPhone

**From:** [RJ Nelson](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Ash place unit lot subdivision  
**Date:** Wednesday, April 8, 2026 3:59:47 PM

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

Was born in Spokane in 1953 and currently reside here as well as my 3 sons with their families. While there may be a need for housing.....it seems that the current city council and planning group are bent to build on any open lots and what's worse without local neighborhood input! No for this project, once it's built....its not going away and another 'green sweet spot' is destroyed. Thanks for your service but don't over build or use your office to help the few

Sent from my iPad

**From:** [Russ Torrison](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Comments opposed to Ash Place  
**Date:** Wednesday, April 1, 2026 2:04:46 PM  
**Attachments:** [Torrison Oppositon to Ash PI 20260401.pdf](#)

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Additional documents attached.

Russell Torrison  
2005 W. Liberty Ave  
Spokane, WA 99205

1 April 2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to express my strong opposition to the proposed development on Ash Place.

I am part of the group that funded the Certified Wetland Report prepared by ECOS USA, and we formally submitted this report to the City. The findings in that report clearly indicate that this project encroaches on a protected wetland buffer zone. This is not a minor concern—it is a *scientifically documented issue* that should carry significant weight in any decision-making process.

After reviewing portions of the project documentation, I am concerned that Whipple is disregarding the science presented in the Certified Wetland Report while instead relying on the Dawes letter, which lacks the same level of scientific rigor and credibility. This selective consideration of evidence raises serious questions about the integrity of the review process.

I also attended the December 2, 2025, Community Meeting hosted by Whipple, where I spoke directly about the Certified Wetland Report. I was not alone—several other community members also provided public testimony highlighting the importance and findings of this report. Given the significance of that meeting and the volume of public input, I would like to know when the official meeting minutes will be posted to the project website for transparency and public record.

Additionally, the proposed development appears to be inconsistent with the City's

Comprehensive Plan. The Plan clearly directs higher-density development toward designated Centers and Corridors, with lower density intended for areas farther away. This project proposes high-density development in a location that is far removed from any identified Center or Corridor, which is in direct conflict with the City's very own stated planning framework.

As indicated previously, the streets Liberty, Courland and Oak which are necessary to access Ash Place are already in horrific disrepair – I assert, some of the very worst in the city.

Have you or any members of the council driven to the site? Or to the neighborhood past it?

Ash Place, which connects to Euclid does not have an outlet. Thus, a development will drastically impede access for longtime residents of the area and create an unsafe bottleneck for emergency equipment to and from single family homes. Homes which were purchased decades ago in good faith that the city would not randomly allow high density development in a residential neighborhood.

Finally, the significance of this historic park and Native American Tribal gathering area cannot be overstated. I've attached a poster for your review which has been in the entryway of our home for decades. Note the reference to "crystal springs" and "clear waters", "source of pure drinking water". Just 40 years ago as child, the waters of the wetlands referenced in the Certified Wetland Report by ECOS USA remained waist deep on me for much of the year. Because of excessive development and blasting, the seasonal lifespan if the ponds are much shorter, and in some years non-existent. More undue strain on the local ecosystem, waterfowl and wildlife is unethical and tragic.

For these reasons—environmental impact, disregard for credible scientific analysis, lack of transparency, and inconsistency with the Comprehensive Plan—I strongly oppose the proposed development on Ash Place.

I urge the City to fully consider the Certified Wetland Report, adhere to its own planning policies, and prioritize responsible, science-based decision-making.

Sincerely,

Russ

Russell Torrison

Attachment: Legendary Drumheller Springs

**From:** [Shaylee Ton](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Certified Wetlands and Density Report  
**Date:** Thursday, April 2, 2026 2:26:27 PM

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

Subject: Certified wetlands and Density Report

10205 N Whittier St  
Spokane, WA, 99218

04/02/2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Shaylee Tonasket

**From:** [SHERI LATTIMORE](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Ash Place development  
**Date:** Wednesday, April 1, 2026 10:34:38 AM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Sheri Lattimore  
1617 W Courtland  
Spokane, WA 99205  
April 1, 2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

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- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,  
Sheri Lattimore



**From:** [Stefani VanDeest](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Drumheller. An important wetland ecosystem and historic site for first nations representation  
**Date:** Thursday, April 2, 2026 2:07:25 PM

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

1117 W. ALICE AVE  
SPOKANE, WA 99204

APRIL 2, 2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Stefani AND Konrad VanDeest  
(Please count 2 people in the reception of email)

**From:** [Susan Goertz](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Certified wetlands and Density Report, Drumheller Springs  
**Date:** Thursday, April 2, 2026 4:11:37 PM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Susan Goertz  
2617 N Ash St,  
Spokane, WA 99205

4/2/2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
[mowen@spokanecity.org](mailto:mowen@spokanecity.org)

Dear Ms. Owen,

I am writing to formally oppose the Ash Place Unit Lot Subdivision (Preliminary Long Plat).

I am a resident of the neighborhood and share serious concerns regarding the environmental, geological, and community impacts of this proposed 20-unit townhouse development.

A Certified Wetland Report prepared by ECOS USA has already been completed and submitted to the City. This report identifies wetland buffer concerns and potential environmental impacts. I strongly urge the City to fully consider this report in its review process and not rely solely on limited or seasonal assessments.

In addition, this project appears to require blasting of basalt, which raises concerns about vibration, potential damage to nearby properties, and disruption to natural subsurface conditions. The proximity of development to wetland areas and the use of extensive concrete foundations also present risks to drainage and long-term environmental stability. This sight is historically significant to the Spokane tribe. It is adjacent to the Chief Spokane Garry School monument.

The area is also home to wildlife, including mule deer and bats, which may be negatively impacted by increased density, noise, and habitat disruption.

I am also concerned that the proposed density does not align with the intent of the City's Comprehensive Plan, which directs higher density development to designated Centers and Corridors.

Given these concerns, I respectfully request:

- Full consideration of the Certified Wetland Report in the official record
- Careful evaluation of environmental and geological risks
- Consideration of whether a Determination of Significance (DS) is warranted
- That no further action be taken until all impacts are fully and transparently reviewed

Thank you for your time and consideration.

Sincerely,

Susan Goertz



**From:** [Tammi Ray](#)  
**To:** [Owen, Melissa](#)  
**Subject:** Ash Place Proposed Development  
**Date:** Friday, March 27, 2026 10:41:40 AM

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

My name is Tammi Ray and I am part of a group that paid for the Certified Wetland Report produced by ECOS USA . We submitted the full report to the City. This project "encroaches" on the wetland buffer zone." It appears that the developers (Whipple)are ignoring the science provided in the Certified Wetland Report produced by Dawes Letter. This is very concerning to me and everyone that loves Drumheller Springs Park. My other concern is that this proposed development is at the only entrance and exit for the other 17 existing home on Ash Place and W Euclid because it is a no outlet...Dead End Street. And if the city is trying to encourage walking instead of driving you just added 20x2 vehicles right at the only way to drive into or out of our neighborhood.

We bought our house in 1982 and we are not going anywhere...But I would be able to if needed. Thank you

Tammi Ray

Russell Torrison  
2005 W. Liberty Ave  
Spokane, WA 99205

1 April 2026

Melissa Owen, Senior Planner  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, WA 99201  
mowen@spokanecity.org

Dear Ms. Owen,

I am writing to express my strong opposition to the proposed development on Ash Place.

I am part of the group that funded the Certified Wetland Report prepared by ECOS USA, and we formally submitted this report to the City. The findings in that report clearly indicate that this project encroaches on a protected wetland buffer zone. This is not a minor concern—it is a *scientifically documented issue* that should carry significant weight in any decision-making process.

After reviewing portions of the project documentation, I am concerned that Whipple is disregarding the science presented in the Certified Wetland Report while instead relying on the Dawes letter, which lacks the same level of scientific rigor and credibility. This selective consideration of evidence raises serious questions about the integrity of the review process.

I also attended the December 2, 2025, Community Meeting hosted by Whipple, where I spoke directly about the Certified Wetland Report. I was not alone—several other community members also provided public testimony highlighting the importance and findings of this report. Given the significance of that meeting and the volume of public input, I would like to know when the official meeting minutes will be posted to the project website for transparency and public record.

Additionally, the proposed development appears to be inconsistent with the City's Comprehensive Plan. The Plan clearly directs higher-density development toward designated Centers and Corridors, with lower density intended for areas farther away. This project proposes high-density development in a location that is far removed from any identified Center or Corridor, which is in direct conflict with the City's very own stated planning framework.

As indicated previously, the streets Liberty, Courland and Oak which are necessary to access Ash Place are already in horrific disrepair – I assert, some of the very worst in the city.

Have you or any members of the council driven to the site? Or to the neighborhood past it?



## Legendary DRUMHELLER SPRINGS



In 1966 the Comstock Foundation deeded these historic Springs to Spokane for a park.  
DANIEL DRUMHELLER, Pioneer and early mayor of Spokane.  
Courtesy of Eastern Washington Historical Society.

These crystal Springs near Euclid & Oak flow from Spokane's past. Important to Indians as the only water on the North Hill, Drumheller Springs lies on the trail from the Upper Spokane River to Spokane House. Indian gatherings were held here through the centuries, and many sacred burial grounds are in the area. Spokane Garry taught here, and the Springs have seen a cavalcade of fur traders, missionaries, miners, soldiers and stock men. In the 1880s, all supplies came up from Walla Walla by pack train. "Uncle Dan" often led these trains, and finally came to stay. He watered his stock at Drumheller Springs and built a slaughterhouse close by, using the clear waters in his operation. Far from offending the Spokanes, this pleased them, and they gathered about. Food was often scarce and "Uncle Dan" was kind. He gave them the cattle parts the townsfolk didn't want but that they considered delicacies.

Colorful Uncle Dan Drumheller was a pony express rider, packer, miner, rancher, investor, banker, cattleman and mayor of Spokane. He brought the first threshing machine into Eastern Washington, earning \$1,100 for managing it the first season. The Drumheller family played a large part in the building of SPOKANE'S FIRST NATIONAL BANK, and Joseph Drumheller was a member of our Board of Directors for over 25 years. As the little town grew, Drumheller Springs was the source of pure drinking water for many of its families. Even today, some can remember fetching water from Drumheller Springs for their mothers. There have been many changes since Indians made Winter camp at Drumheller Springs... many changes since 1882, when our Bank first came to this part of the country. One thing hasn't changed in all these years: FIRST NATIONAL BANK service!



SPOKANE'S OWN BANK . . . BUILT AND OWNED BY THE PEOPLE OF SPOKANE

These crystal Springs near Euclid & Oak flow from Spokane's past. Important to Indians as the only water on the North Hill, Drumheller Springs lies on the trail from the Upper Spokane River to Spokane House. Indian gatherings were held here through the centuries, and many sacred burial grounds are in the area. Spokane Garry taught here, and the Springs have seen a cavalcade of fur traders, missionaries, miners, soldiers and stock men.

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As the little town grew, Drumheller Springs was the source of pure drinking water for many of its families. Even today, some can remember fetching water from Drumheller Springs for their mothers.

There have been many changes since Indians made Winter camp at Drumheller Springs ... many changes since 1882, when our Bank first came to this part of the country. One thing hasn't changed in all these years: FIRST NATIONAL BANK service!

**From:** [victor FRAZIER](#)  
**To:** [Owen, Melissa](#)  
**Cc:** [Dennis Flynn](#); [Audubon-Downriver Neighborhood Council](#); [Steve Coxkrewe. Com](#)  
**Subject:** Ash Place Development 2026  
**Date:** Thursday, March 26, 2026 4:47:27 PM

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Melissa,

I am writing to say that the development on Ash Place near the Drumheller Springs Park and the natural wetlands there is not appropriate for this site. The neighbors paid for a certified scientific study that shows what many of us believed all along, that this is a natural wetlands area and vital to the ecology and survival of many unique species of animals and plants. The study was conducted by Ecos USA and I believe it was submitted to the City last summer (2025) There is no mitigation for the potential damage and change in the natural environment to that location should this build go through. In the spring there are abundant vernal pools, Camas flowers, Bitter Root flowers, herbs and plants that are not commonly found in our urban environment. This development would obliterate many of these species.

This plateau has been used by indigenous people as a tribal place to camp, dry fish, tan hides, and gather for a long time. Chief Garry built a school in this area in the late 1800's because it was close to tribal camp. It is a natural area that is not appropriate for development and not near any centers or corridors for public transit or services. Twenty town homes with parking for only one vehicle would cause an excess of off-street parking and traffic congestion. The development and construction would damage the residential roads and the natural area even outside of the development. Please don't do this.

Sincerely, Victor Frazier



Edward Torrison <gunder1936@gmail.com>

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**Dear Melissa, I am writing thjs letter in opposition to construction of the Ash Place project.**

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Edward Torrison <gunder1936@gmail.com>

Wed, Apr 1, 2026 at 8:06 AM

Draft

The Drumheller Springs Natural area is one of a kind in rural settings in a large city such as Spokane. I moved to W. Liberty street in 1973. This street marks the northern edge of the Drumheller springs park. There were three natural ponds present that held many duck geese . When construction began there was a lot blasting as the property was all on basalt . It was about a year later when the two smaller ponds started to dry up , never to return. The Ash Place project will require massive blasting . The last pond will surely be lost permanently. Perhaps the entire wetlands could be lost ? Please do whatever is in your power to stop the project.

Sincerely, E.G. Torrison D.D.S.