



Spokane Plan Commission Agenda

Wednesday, July 12, 2023

2:00 PM

Hybrid - Council Briefing Center / Webex
808 W Spokane Falls Blvd, Spokane, WA 99201

Virtual Meeting Link - See Below For Information

TIMES GIVEN ARE AN ESTIMATE AND ARE SUBJECT TO CHANGE

Public Comment Period:

3 minutes each

Citizens are invited to address the Plan Commission on any topic not on the agenda.

Commission Briefing Session:

2:00 – 2:20

1. Approve [6/28/2023](#) meeting minutes
2. City Council Report
3. Community Assembly Liaison Report
4. President Report
5. Transportation Sub-Committee Report
6. Secretary Report
7. Approval of current agenda

All
CM Zack Zappone
Mary Winkes
Greg Francis
Clifford Winger
Spencer Gardner

Workshops:

2:20 – 2:50

1. [Building Opportunity for Housing](#)

Tim Thompson

2:50 – 3:30

2. [Shoreline Master Program text update for Fish Rearing](#)

Tirrell Black and Tyler Kimbrell

3:30 – 4:00

3. [South Logan Transit Oriented Development – Preferred Alternative](#)

Maren Murphy

Adjournment: The next PC meeting will be held on Wednesday, July 26, 2023

The password for City of Spokane Guest Wireless access has been changed:

Username: COS Guest

Password: K8vCr44y

AMERICANS WITH DISABILITIES ACT (ADA) INFORMATION: The City of Spokane is committed to providing equal access to its facilities, programs and services for persons with disabilities. The Council Briefing Center in the lower level of Spokane City Hall, 808 W. Spokane Falls Blvd., is wheelchair accessible and also is equipped with an infrared assistive listening system for persons with hearing loss. Headsets may be checked out (upon presentation of picture I.D.) through the meeting organizer. Individuals requesting reasonable accommodations or further information may call, write, or email Risk Management at 509.625.6221, 808 W. Spokane Falls Blvd, Spokane, WA, 99201; or mlowmaster@spokanecity.org. Persons who are deaf or hard of hearing may contact Risk Management through the Washington Relay Service at 7-1-1. Please contact us forty-eight (48) hours before the meeting date.

Plan Commission Meeting Information

Wednesday, July 12, 2023

Plan Commission will be held in a hybrid in-person / virtual format. Members of the public are welcome to attend in person at City Hall or online using the following information.

Meeting Password: PlanCommission	Join Webex Meeting Online: JOIN MEETING
Meeting Number (access code): 146 205 9622	Tap to join from a mobile device (attendees only): +1-408-418-9388,,1462059622## +tel:%2B1-408-418-9388,,*01*1462059622%23%23*01* United States Toll Join by phone: +1-408-418-9388 United States Toll Global call-in numbers: https://spokanecity.webex.com/spokanecity/globalcallin.php?MTID=m514c2d4fc1d4af7864559443420dee7b Join from a video system or application: Dial sip:1462059622@spokanecity.webex.com You can also dial 173.243.2.68 and enter your meeting number.

Please note that public comments will be taken during the meeting, but the public is encouraged to continue to submit their comments or questions in writing to:

plancommission@spokanecity.org

The audio proceedings of the Plan Commission meetings will be recorded, with digital copies made available upon request.

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Spokane Plan Commission - Draft Minutes

June 28, 2023

Webex Teleconference

Meeting Minutes: Meeting called to order at 2:00 PM by Greg Francis

Attendance:

- Board Members Present: Greg Francis (President), Ryan Patterson (Vice President), Michael Baker, Jesse Bank, Carole Shook, Clifford Winger, Christopher Britt, Kris Neely, Todd Beyreuther
- Board Members Not Present: Tim Williams
- Non-Voting Members Present: Mary Winkes (Community Assembly Liaison), Council Member Zack Zappone
- *Quorum Present: yes*
- Staff Members Present: Spencer Gardner, Tirrell Black, Jackie Churchill, KayCee Downey, Tim Thompson, James Richman, Logan Camporeale, Teri Stripes

Public Comment: Citizens are invited to address the Plan Commission on any topic not on the agenda. 3 Minutes each. NONE

Minutes: Minutes from 6/14/2023 approved unanimously

Current Agenda: The current agenda was approved unanimously.

Briefing Session:

1. City Council Liaison Report -Zack Zappone

- Council Member Zappone reported that he and CM Bingle created a proposal for reduced parking minimum requirements within ½ mile of transit and to decouple parking fees from rent as well. They will go to Community Assembly in July to present the proposal.

2. Community Assembly Liaison Report - Mary Winkes

- Mary Winkes reported that a Community Assemble member suggested that terminology for livability be looked at.

3. Commission President Report - Greg Francis

- President Frances reported that the General Facilities Charges work group has wrapped up and the information they learned will be going to constituents for feedback. A report will be written about the various options for GFC fees and implementation. Once the report has been completed it will be presented at Plan Commission and then at to City Council.

4. Transportation Subcommittee Report - Clifford Winger

- Clifford Winger reported that PCTS is cancelled for JULY due to the Independence Day holiday. He also reported that Integrated Capital Management has submitted the Safe Streets For All Grant.

5. Secretary Report - Spencer Gardner

- Spencer Gardner asked the Plan Commission for feedback about cancelling the second August Plan Commission meeting for summer break.

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Workshop(s):

1. Tentative Upcoming Agenda Items

- Presentation provided by Plan Commission
- Questions asked and answered

- Discussion ensued
2. **Building Opportunity in Housing, Phase 2 Code Updates**
 - Presentation provided by Tim Thompson and KayCee Downey
 - Questions asked and answered
 - Discussion ensued
 - Todd Beyreuther joined the meeting at 3:05PM
 3. **Hillyard Subarea Plan Introduction**
 - Presentation provided by Tim Thompson and Ryan Givens (Stantec)
 - Questions asked and answered
 - Discussion ensued
 - Kris Neely arrived in-person to the meeting at 3:21

Hearings

1. **Renaming a section of W. Dean Ave to Joe Albi Way Z23-215STNC**
 - Presentation provided by Tirrell Black and Shawn Jordan
 - Questions asked and answered
 - Discussion ensued
 - Public Comment:
 - Marlene Feist, Public Works Director, and liaison to Spokane Public Schools discussed the Letter of support from Mayor Woodward, and spoke in favor of changing the name of the section of W. Dean Ave in front of the stadium to Joe Albi Way
 - **Motion:**

Michael Baker motioned that the the Plan Commission recommend the renaming of a section of W. Dean Ave to Joe Albi Way to the City Council as written and presented. Seconded by Jesse Bank. Motion carries (8,0,1)
2. **Building Opportunity in Housing**
 - Presentation provided by Kevin Freibott
 - Questions asked and answered
 - Discussion ensued
 - Public Comment:
 - Harold Vanderpool from East Central and was involved in the Building Opportunity in Housing public engagement. Harold spoke in favor of the new language in Chp. 3 particularly in LU 5.5.
 - Sam Mace stated that infill needs to be handled responsibly and is concerned that there is no oversight on development that is happening and wants to know how neighborhood concerns will be addressed and wants to retain open space.
 - Darin Watkins: Spokane Realtors Association, spoke in favor of Building Opportunity in Housing, and described it as “visionary”.
 - Colleen Weedman, Chief Program Officer for Habitat for Humanity Spokane, spoke in favor of the Building Opportunity if Housing, and stated the housing crisis and that the housing costs are impacting Habitat for Humanity homes too.
 - Eric Lyons, Chief Operations Officer for Habitat for Humanity Spokane, discussed the increased costs of housing and how it is much more expensive to build houses even with volunteers. He spoke in favor of Building Opportunity in Housing proposal.

- Cathy Metke said that high density housing should be placed where there are already services and infrastructure and has concerns about costs.
- Drew Peterson, Land Stewardship guide for Presbyterian Church in Spokane and he spoke in favor of Building Opportunity for Housing.

Public Comment is summarized by staff, to hear comments in their entirety please watch the recording online: <https://vimeo.com/showcase/2783468>

- **Motions:**

Michael Baker moved to recommend Z23-112COMP Building Opportunity for Housing phase 1 Comprehensive Plan Amendment as written and presented. Seconded by Clifford Winger. Original Motion carries unanimously (9,0)

- Clifford Winger made a friendly amendment to approve the proposed language for LU 5.5 regarding Compatible and Complementary. Seconded by Jesse Bank. Motion Carries unanimously (9,0)
- Carole Shook made a motion to change Intensity to density in LU 1.3 and 1.4 Seconded by Jesse Bank. Motion fails to carry (0,9)
- Jesse Bank moved to include the change all references of “church” with “places of worship”. Seconded by Clifford Winger. Motion carries unanimously (9,0)
- Christopher Britt motioned to change the language from Residential Increased to Residential Plus. Seconded by Jesse Bank motion carries (6,3)

Meeting Adjourned at 5:17 PM

Next Plan Commission Meeting scheduled for Wednesday, July 12, 2023



PLANNING SERVICES
808 W. SPOKANE FALLS BLVD.
SPOKANE, WASHINGTON
509.625.6300
my.spokanecity.org

Building Opportunity for Housing
Phase 2 Residential Development Code Regulations
July 5, 2023

President Francis and Plan Commissioners
City of Spokane

RE: July 12, 2023 Plan Commission Workshop

Thank you for your feedback at the June 28 workshop on lessons learned from the Building Opportunity and Choices for All interim ordinance, as well as the importance of building size versus unit count when it comes to the regulation of intensity. To continue moving the Building Opportunity for Housing discussion forward, Planning staff will present additional topics for discussion to Plan Commission at your July 12 workshop, including:

- Garage location and size
- Setbacks
- Building height

Thank you again for all of your work on behalf of the City of Spokane and helping shape Phase 2 of the Building Opportunity for Housing project.

Sincerely,

Tim Thompson, AICP, Principal Planner
KayCee Downey, AICP, Planner II

How to Get Involved

Sign up for updates and news:

developmentcode@spokanecity.org

Visit the web for more information:

shapingspokanehousing.com



SHORELINE MASTER PROGRAM AQUACULTURE UPDATE BRIEFING PAPER
City of Spokane
Plan Commission Workshop
Planning Services
July 12, 2023

Subject

This proposal will amend the Shoreline Master Program (SMP) of the Spokane Municipal Code (SMC) 17E.060.470 and 17E.060.690 to allow aquaculture uses. The proposal will also amend the Use Category Description for Agriculture under SMC 17C.190.500 to align with the changes to the SMP. The exact amendments to the code will be available online at the following address: my.spokanecity.org/aquacultureupdate.

Background

Section 17E.060.470 Aquaculture currently states that there is no anticipated aquaculture activity with the City of Spokane. Based on requests from the Coeur d'Alene Tribe and other potential native salmonid restoration projects, aquaculture uses are anticipated and therefore the aquaculture section of the SMP and other applicable development regulations require updating. The request to amend the Shoreline Master Program to allow aquaculture uses is made with Council support.

Impact

The draft proposed text amendments will allow aquaculture uses in the Urban Conservancy Environment and Natural Environment designations in the Latah Creek shoreline district. Impacts from development of aquaculture facilities will be managed or mitigated at the permitting phase.

Action

A tentative public hearing is scheduled for the end of July 2023, it is requested that Plan Commission make a recommendation to Council for amending the Shoreline Master Program.

**BRIEFING PAPER
City of Spokane
Plan Commission
Workshop
July 12, 2023**

Subject

The South Logan Transit-Oriented Development (TOD) Project supports more connectivity and livability for the community, businesses, and organizations in the South Logan area of the Logan Neighborhood. The City of Spokane posted the Draft South Logan TOD Plan and the Draft Environmental Impact Statement (DEIS) for public review from May 9 – June 8, 2023, with 16 comment letters received. Project staff and the consultants hosted a public workshop on Thursday, May 18 at Gonzaga University. A workshop summary and public comment summary will be available on the project page. The response to public comments will be analyzed and published in the Final EIS.

The preferred alternative will shape the Final Plan and Final EIS as the preferred direction for future growth and development, which may be composed of some combination of the three different alternatives. The plan values, which were developed through public input and reflect the guiding principles for South Logan, will ultimately be used along with the results of the EIS analysis and public comment to develop a preferred alternative. The project team conducted a workshop on the preferred alternative with the Plan Commission on June 14, as well as hosted a virtual workshop for the community on June 22. All project materials and information are available on the project page: <https://my.spokanecity.org/southlogantod>.

Attached is the public workshop feedback summary, public comment summary, and all public comment letters received.

Impact

The South Logan TOD Project is reviewing development regulations zoning, and design standards to encourage a mix of uses in a pedestrian-friendly environment close to transit; studying environmental impacts and mitigation measures of planned development to streamline permitting; and creating a plan and policies, based on community vision, that provide a coordinated framework and approach in the project area. The development of a Planned Action EIS will provide more detailed analysis of the impacts of many potential projects all at once during the planning stage, rather than each project one at a time. The goal is to facilitate development that will help achieve goals for the area by simplifying and expediting environmental review of future individual projects. The outcome will likely result in land use changes and new development opportunities.

Funding

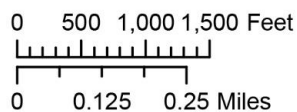
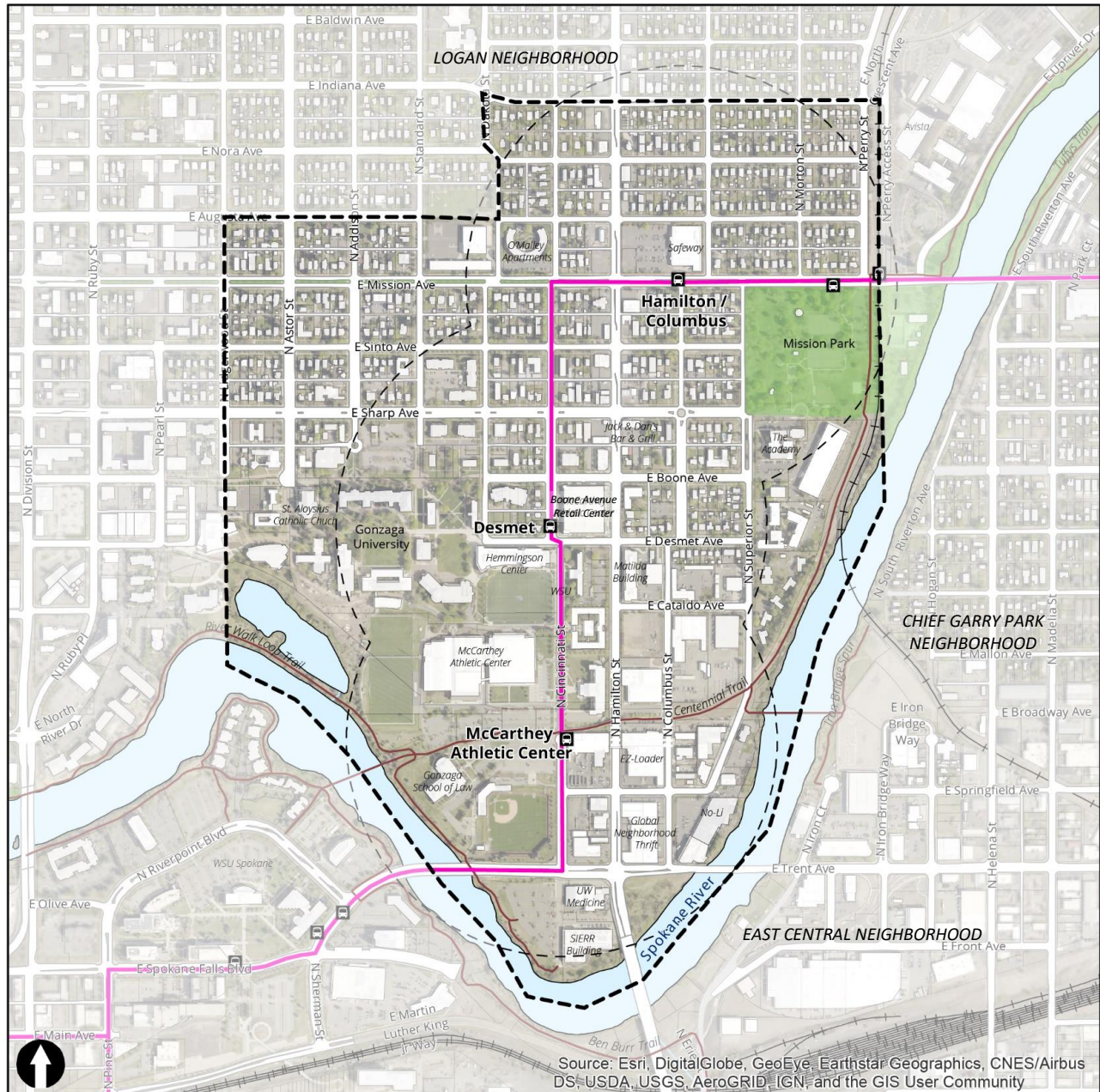
This project is funded by the Transit-Oriented Development Implementation (TODI) grant program through the WA Department of Commerce. Final deliverables are expected to be completed in summer 2023.

Consideration:

At this workshop, project staff will present an updated preferred alternative based on Plan Commission direction and community feedback. Staff requests direction from the Plan Commission to bring the preferred alternative to public hearing for discussion and consideration. The preferred alternative, final subarea plan and final EIS will be brought forward for adoption by resolution.

BRIEFING PAPER
City of Spokane
Plan Commission
Workshop
July 12, 2023

SOUTH LOGAN STUDY AREA
CONTEXT MAP



- Study area
- City Line route and stop
- Parks
- Trails
- 1/4 mile from City Line
- +— Railroad

DRAFT SOUTH LOGAN TOD PLAN PUBLIC WORKSHOP SUMMARY

THURSDAY, MAY 18, 2023, 6:00 PM – 7:30 PM

GONZAGA UNIVERSITY @ HEMMINGSON CENTER

AGENDA

- Welcome
- Subarea Plan and DEIS overview
- Q & A
- Small group discussion
- Share out and next steps



AREAS OF AGREEMENT

- Limit impacts to historic buildings in the neighborhood
- Good quality design for new buildings is important
- The southeast is the best opportunity for new development

AREAS OF DISAGREEMENT

- Future study of Sharp Ave pedestrian bridge
- Development north of Gonzaga (protecting character, scale and form of new development)
- Role of detached housing/internal conversations for student housing vs. apartment buildings

INDIVIDUAL GROUP COMMENTS

GROUP 1

- Participants agreed that if there's upzones and growth that the SE area is the best place for it – based on reduced impact on current neighborhoods, current uses and ownership there.
- Two didn't like the Sharp St pedestrian bridge, feeling that it will attract more unhoused individuals into the neighborhood
- Participants noted that public safety is lacking; some students are terrified to walk through the neighborhood
- Some participants didn't like the high growth options, particularly for areas north of Desmet
- Two participants own multiple rental units in the neighborhood. Findings:
 - They are making a profit now renting units from existing detached "single-family" dwellings. Any of the upzones probably won't move them to redevelop.
 - Nearly all of the students own cars.
 - Both work hard to ensure that students minimize impacts to surrounding neighbors
- It's tough for businesses to serve both students and non-students. With students gone in summer, it's more challenging obviously when class isn't in session
- Gonzaga comments
 - Increasing density south of Sharp/Sinto – closer to campus
 - Don't see enrollment increasing much in near term – goal to maintain what we have
- Concern shared about neighborhood impacts of rentals that have tenants with criminal records

GROUP 2

- Likes:
 - Access to riverfront – should include benches, trees, nature trails, walking areas
 - Access to downtown via trails (riverfront connection)
 - Like access to pedestrian infrastructure and crossings along Hamilton, and Mission Park connectivity
 - Centers and Corridors – market driven, focused development towards Hamilton
 - Alt 3 housing increase is more moderate, focused
- Dislikes
 - Feeling that everything is market driven so there's no guarantee plan will be successful
 - Development in the neighborhoods – impacts to historic homes/character
 - Many rental properties are not well maintained
 - Non-student renters are getting priced out
 - Concern about tear down of historic and old properties
 - Concern about employment center emphasis ignoring other uses in the area
- Goals/hopes
 - Design guidelines/standards are huge for the preferred alternative
 - Would like to increase owner-occupied housing
 - Desire more community investment by residents
 - Need policies to avoid people being priced out
- Alternative comments
 - Alt 3 has more neighborhood protections for historic homes/character
 - Historic preservation conflicts with Alt 4
 - Advocate for Alt 1 – already a place in place for higher density – and Alt 1 protects historic homes. Planning for density around transit stops is a negative when city already has Centers and Corridor designations/zones.
 - Certain housing types are acceptable if they can preserve the existing character (internal ADU, boarding houses) + design standards

GROUP 3

- General concerns
 - Please don't encourage "box houses"
 - Large structures that exploited a code loophole for ADUs/student housing in recent years and led to a court case regarding development in the Missing Ave Historic District. Code loophole was addressed in recent years.

- Haphazard development in and around Gonzaga campus as well as exploitation of code loopholes created community pressure which led to the creation of the Hamilton Form-based Code. It's important to understand that.
- Please don't displace The Warehouse (indoor youth sports facility)
- How does HB 1110 affected these?
 - Not too much. HB 1110 doesn't go too much further than what Spokane already allows under BOCA/BOH
- Questions about balancing FBC and CC zoning on Hamilton
- Alternatives
 - Overall preference for Alt 3 with residential low around Mission Ave and Mission Park, with the addition of high-density housing and mixed-use should be allowed on Sharp Ave.
 - More intense development makes sense in the SE area, but CC1-EC does not have great design standards. Rezones should go to CC-DC or something else with better design.
 - Traffic calming on Hamilton St should be a part of all alternatives.
 - Agreement that smaller upzones may not encourage development because property owners are renting existing homes to college students with little incentive for redevelopment.
- Investments
 - No problem with the Sharp Ave bridge study. It would help activate Mission Park and Sharp Ave, which is good. Should not be the priority in the immediate future though.
- What's missing from the alternatives?
 - "Community Design" is the most important set of goals. Pay close attention to aesthetics and rights of way. Folks need comfortable routes to walk in the neighborhood and to get to the City Line bus stops.
 - Find ways to retain the unique sports facilities and historic homes
 - Think about the study area gateways – how do people know they're in South Logan? There should be a big sign "WELCOME TO SOUTH LOGAN" along Hamilton as people get off the freeway so that they know they're in a neighborhood now.



Draft TOD Plan and DEIS Public Comment Summary

Updated July 2023

The South Logan Transit-Oriented Development (TOD) Project will support more connectivity and livability in the South Logan area for the community, businesses, and organizations in the Logan Neighborhood. The recently built STA City Line bus rapid transit route presents an opportunity to create a focused community vision and policies that encourage mixed-use, walkable places close to transit. The outcome will be a plan and policies, based on community vision, providing a coordinated framework for the South Logan area. The City of Spokane published the Draft South Logan TOD Plan and the Draft Environmental Impact Statement (DEIS) for public review and comment from May 9 to June 8, 2023. All materials are available on the project page: my.spokanecity.org/southlogantod

Comment Summary

In total, we received 16 written comments during the public comment period. Below is a thematic summary of these comments. Note that this is a high-level summary, and the full comment analysis and response to comments will be published in the Final EIS.

- 5 agency comments
 - Washington Department of Transportation
 - Spokane Transit Authority
 - City of Spokane Historic Preservation
 - City of Spokane Parks
 - City of Spokane Streets
- 3 institutional/organizational comments
 - Gonzaga University (2 comments)
 - University District
- 8 individuals

Common Themes

- Support transit-oriented development and livability enhancements to South Logan area
- Support bicycle and pedestrian improvements, connectivity improvements
- Support various levels of increased density and growth, zoning changes, mixed-use development
- Support enhanced connection to the Spokane River
- Consider design/developments standards to ensure quality and pedestrian oriented development
- Expand on impacts related to transportation, traffic, and parks to ensure mitigation is identified
- Expand on housing affordability and anti-displacement strategies, considering naturally occurring affordable housing
- Concerns on population growth and increased density
- Concerns on impacts to public infrastructure and utilities with growth and development
- Concerns on impacts to traffic and parking

- Concerns about lack of focus on historic preservation and strategies to prioritize historic resources
- Concerns on use of public funding for bicycle/pedestrian infrastructure
- Concerns on maintaining housing affordability with redevelopment
- Preferences:
 - Some comments expressed preference for Alt 4 with design standards
 - Some comments expressed preference for Alt 2 or 3 with more focus on development in the Southeast Riverfront
 - One comment expressed preference for Alt 1 and a focus on non-zoning related changes

What's Next

We will consider all the timely comments received during the public comment period, and will be responding to the substantive comments in writing. This will be published in an appendix in the final EIS. Following SEPA guidance, possible responses that will be considered include:

- Explain how the alternatives, including the proposed action, were modified;
- Explain how the analysis was supplemented, improved, or modified;
- Make factual corrections; or
- Explain why the comment does not warrant further response.

In addition to the written public comments received, we also hosted a public workshop on Thursday, May 18, 2023 during the public comment period. For a summary of the feedback heard in that workshop, please visit the [project webpage](#).

The comments will also help inform the development of the preferred alternative, along with the full project engagement to this date, the environmental review in the DEIS, and the plan values that were outlined in the Draft South Logan TOD Plan. The preferred alternative may be composed of some combination of the three different alternatives, based on feedback. Ultimately, the preferred alternative will shape the Final Plan and Final EIS as the preferred direction for future growth and investment in South Logan.

From: [Murphy, Maren](#)
To: [Downey, KayCee](#)
Cc: [Planning & Development Services South Logan TOD Project](#)
Subject: FW: TOD Feedback
Date: Monday, June 5, 2023 11:30:16 AM

Hi KayCee,

I confirmed with Chuck that these should be included in the public record.

Thanks,
Maren

Maren Murphy, AICP (she/her) | City of Spokane | Senior Planner | Planning Services
509-625-6737 | main 509-625-6500 | mmurphy@spokanecity.org | my.spokanecity.org

From: Murphy, Chuck <murphyc@gonzaga.edu>
Sent: Friday, May 19, 2023 11:17 AM
To: Murphy, Maren <mmurphy@spokanecity.org>; Black, Tirrell <tblack@spokanecity.org>
Cc: Sammons, Ken <sammons@gonzaga.edu>
Subject: TOD Feedback

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Maren and Tirrell,

It was good to see you both at the meeting last night. Per your request, here are some further comments for your consideration as it relates to our campus.

- 1. In Alternative 2 and 4, there is a one block expansion of the zone immediately west of the Desmet Station. For practical reasons given the existing Rosauer Building on the block, I am not sure increasing the density beyond that of the primary campus itself is needed.**
- 2. In Alternative 4, there is increased density for the blocks between Cincinnati and Hamilton, and south of Boone to mixed use 150'. We would be in support of that.**
- 3. In Alternative 4, it looks like the campus proper is Residential 70' if I am reading the color correctly. We would support that. I also**

like the extension of this to the north to Sinto only. For the area between Sinto and Mission, I would not change the zoning. The neighbors do not want to see homes along Mission change from the character that currently exists. As you saw last night, they would like to keep the residential and historical feel, and are not in favor of auxiliary units in the back yard.

4. **We support improvements at Springfield and Hamilton. Initially, HAWK system is likely adequate but when development begins in the area a traffic light would be needed to allow traffic to get safely onto Hamilton.**
5. **We would support the redesign of the Hamilton and Sharp Intersection, although it is not really clear what this would entail.**

As for comments for the area east of Hamilton, I have the following for your consideration.

1. **I like the increased density shown in E Alternative 4, although you might keep this for the area south of Desmet rather than mid-block.**
2. **The neighborhood may be more supportive of keeping the existing residential zoning for the blocks west of Mission Park and north of Sharp. There could be some increased density for the area south of Sharp to have more consistency with the area directly south of Mission Park that is no longer in residential use.**
3. **Improved pedestrian access across the river should focus on Mission not on Sharp.**
4. **Alternative 3 and 4 call for a “main street” on Columbus. I think this is a great idea for the area south of Desmet. The neighbors for years have complained about northbound traffic avoiding the Sharp/Hamilton intersection and Mission/Hamilton intersection by cutting through the neighborhood to get to Mission. Plans**

that discourage this through- traffic would be well received by the neighbors.

5. **Alternative 3 references the opportunity for shared infrastructure such as parking. I think this is a great idea. I would not be in favor of eliminating parking within ¼ mile of the BRT. Perhaps there can be a lower standard than exists now. Parking is an issue for existing home owners that can't park in front of their own homes because adjacent homes occupied by 5-6 students in an adjacent house consume on-street parking. This is another long standing issue in the neighborhood.**
6. **Alternative 3, item H speaks to riverfront connections and open space improvements. I agree of the need to complete the trail connection along north bank of the river. There is an opportunity for a pocket park of sorts at the southeast intersection of Hamilton and Trent. It would likely need to be pedestrian oriented as there is not adequate space for parking, but it could be a nice amenity for users of the trail system or for rafters or boaters to pull onto the shore at this point.**
7. **As I mentioned last night, the reference to increased new residents as a result of the proposed changes would be a concern to some single family home owners in the area. Providing some explanation and context for this might be helpful, particularly that the probability of this increase coming from GU enrollment is extremely low. An alternative might be to provide a range from low to high so as to reflect the uncertainty around a 20 year projection.**

I have copied Ken on this so he can weigh in as well. He has a much more experience than I do when it comes to zoning matters in particular. We thank you for your continued collaboration with us on the impact of proposed changes to our campus.

**Best wishes,
Chuck**

From: [James Bond](#)
To: [Planning & Development Services South Logan TOD Project](#)
Subject: Logan projects
Date: Tuesday, May 30, 2023 9:37:49 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Why do you guys keep spending money on things that don't work no amount of bike Lanes have increased the amount of people riding bicycles trying to make a walkable City will not encourage people to walk in the city maybe if you concentrated on lowering crime people might want to get out of their cars? I'm sick of you spending money on things that don't work please stop the Illinois Street Bike Lane is horrible and almost impossible to navigate because it's not built by people who actually ride bikes Crestline is filled with all kinds of things that give people Flats on their bicycle if there aren't any icebergs that are cleared in the winter making it almost unnavigatable half of the year you guys are virtue signaling and creating crap that doesn't work from federal funds that should never be given to us!

[Sent from Yahoo Mail on Android](#)

From: dougells@yahoo.com
To: [Planning & Development Services South Logan TOD Project](#)
Subject: TOD
Date: Monday, June 5, 2023 3:49:44 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

South Logan TOD development project planning.

I can in NO way support the alternative 4. Significant expansion of very high density housing south of boone (Area E) Is too extream! This alternative promotes an increase of up to 6869 residents in the neighborhood. This is too high a density. Not in my backyard, so to speak. Area E in the study is a good choice for redevelopment, But not at this intensity. I could support alternative 2 or 3 BUT absolutely not the way #4 is presented in this study.

When high density development is zoned, please require a reasonable number of onsite parking by the builders. And provide a mixed use style zoning.

Doug Tompkins
909 E. Boone



June 7, 2023

Maren Murphy, AICP
Senior Planner
City of Spokane
808 W Spokane Falls Blvd
Spokane, WA 99201

RE: DRAFT SOUTH LOGAN TOD PLAN AND DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Murphy,

The Spokane Transit Authority (STA) is in receipt of the Draft Plan, DEIS (Draft Environmental Impact Statement) and associated documents for the South Logan Transit Oriented Development (TOD) Sub-Area. As an active participant in the overall planning process, and a proponent of Transit-Oriented Development, Spokane Transit is supportive of the work and effort that has led to this point. The draft plan and DEIS are a significant step towards helping STA leverage the community's investment in Bus Rapid Transit infrastructure.

After our review of the documents, we are recommending revisions, refinements and actions related to the plan and DEIS. Below we have noted five items to be considered, along with a comment matrix with additional details on specific parts of the DEIS and sub-area plan. Our review was framed squarely on the community's investment in City Line Bus-Rapid-Transit (BRT), and the benefits this provides given the appropriate land use and pedestrian network around stations.

- The Transportation Element of a plan focused on implementing TOD is buried at the end of the analysis; suggest this be moved to the front.
- Add additional language with reference to the City Line. There needs to be a broader discussion of the benefits it brings to all alternatives.
- Reframing of the impacts for all alternatives identified to promote a sense of place (TR Goal A) and focus on a transportation network for all users (TR 1), as identified in the City of Spokane's Comprehensive Plan. We recommend the emphasis and focus within the document should be on improving any adverse impacts to pedestrians or the pedestrian network, especially within one-quarter mile of individual BRT stations
- Within one-quarter mile of BRT stations, onsite parking should be restricted to leverage the community's investment in BRT infrastructure.
- It is unclear how 'potential impacts' are being defined in the document. Specifically in the Public Transportation Alternatives portion, items like pedestrian access/network improvements strengthen transit ridership which is a positive impact/benefit.









Thank you for your consideration of our input. Please contact me with any additional questions.










Best Regards,









A handwritten signature in black ink, appearing to read 'B. Jennings', with a stylized flourish at the end.






Brian Jennings
Deputy Director for Community Development
Spokane Transit Authority

Draft South Logan TOD Sub-area Plan and Draft EIS - Spokane Transit Comment Matrix

Document Page	PDF page	Section	Paragraph	Text	Comment	Language Change	Support
3	6	TOC 3.10		Transportation	Change the order of the items in this section to emphasize transportation. The transportation section is really buried in this order.		
1	9	1.3.1 Alternative 1: No Action	1	with the exception of STA’s City Line bus rapid transit (BRT) route beginning service in 2023 on Cincinnati Street and Mission Avenue	documenting the full route is important, as it connects to SCC and downtown, key destinations that provide greater impetus for some of the proposed revisions (less emphasis on parking).		
5	13	1.4.3.1 Potential Impacts		1) Roadway Facilities and Vehicular Traffic	It's not clear how "impacts" is being defined. In the Roadway Facilities and Vehicular Traffic section, it's all about the driving conditions will be downgraded. And there is no mention to the NSC as another N-S option that will take traffic off of Hamilton. A greater distinction between through and local traffic would be good. And this is said throughout the comments - but the modes should be listed in order that we want to prioritize them. Vehicles should come last.		
6	14	1.4.3.1 Potential Impacts		3) Public Transportation - Alternative 2	Not clear how "impacts" are being defined. Pedestrian improvements enhance mobility and access for pedestrians, and increase access to transit. Use would rather than could when describing impacts on transit ridership.		
6	14	1.4.3.1 Potential Impacts		3) Public Transportation - Alternative 3	Again, it's not clear how "impacts" are being defined. Increasing housing density is a transit benefit. So saying there are no investments in Alt 3 that benefit public transportation is not correct. The document says Alt 3 will "catalyze development towards the creation of a vibrant mixed-use transit-oriented hub." That's a benefit.		
6	14	1.4.3.1 Potential Impacts		3) Public Transportation - Alternative 4	Use would rather than could when describing impacts on transit ridership.		
6	14	1.4.3.2 Mitigation 1) Roadway Facilities and Vehicular Traffic		Potential impacts on vehicular movements along arterials in the study area may require additional evaluation and mitigation. The overall performance of intersections, such as vehicular delay or volume-to-capacity ratios, should be assessed by comparing the existing and the forecasted performance based on proposed land use and/or transportation infrastructure modifications. If the proposed changes result in intersections not meeting the City’s adopted standards, mitigation measures may have to be implemented. Modifications to traffic circulation, volumes, speeds, on street parking, and/or property access may occur as a result of the proposed alternatives, and such impacts may have to be mitigated.	Edit: Potential impacts on vehicular movements along arterials in the study area may require additional evaluation and mitigation. The overall performance of intersections, such as vehicular delay or volume to capacity ratios, should be assessed by comparing the existing and the forecasted performance based on proposed land use and/or transportation infrastructure modifications. If the proposed changes result in intersections not meeting the City’s adopted standards, mitigation measures may have to be implemented. Modifications to traffic circulation, volumes, speeds, on street parking, and/or property access may occur as a result of the proposed alternatives, and such impacts may have to be mitigated.		
6	14	1.4.3.2 Mitigation 1) Roadway Facilities and Vehicular Traffic		Potential impacts on vehicular movements along arterials in the study area may require additional evaluation and mitigation. The overall performance of intersections, such as vehicular delay or volume-to-capacity ratios, should be assessed by comparing the existing and the forecasted performance based on proposed land use and/or transportation infrastructure modifications. If the proposed changes result in intersections not meeting the City’s adopted standards, mitigation measures may have to be implemented. Modifications to traffic circulation, volumes, speeds, on street parking, and/or property access may occur as a result of the proposed alternatives, and such impacts may have to be mitigated.	For the strikethrough (above), this convinces the reader that there is a Pass/Fail for these very math-y sounding measurements, when it's really what the City is comfortable accepting.		
6	14	1.4.3.2 Mitigation 1) Roadway Facilities and Vehicular Traffic		Potential impacts on vehicular movements along arterials in the study area may require additional evaluation and mitigation. The overall performance of intersections, such as vehicular delay or volume-to-capacity ratios, should be assessed by comparing the existing and the forecasted performance based on proposed land use and/or transportation infrastructure modifications. If the proposed changes result in intersections not meeting the City’s adopted standards, mitigation measures may have to be implemented. Modifications to traffic circulation, volumes, speeds, on street parking, and/or property access may occur as a result of the proposed alternatives, and such impacts may have to be mitigated.	I think the best they can say is - regional traffic models show that traffic volumes and vehicle delay increase slightly by 2047, but the overall impacts are unknown, and will be mitigated by improved transit access and transportation options. Then the last sentence is probably fine.		
6	14	1.4.3.2 Mitigation 1) Roadway Facilities and Vehicular Traffic		If the proposed changes result in intersections not meeting the City’s adopted standards, mitigation measures may have to be implemented	Recommend adopting a strategy to revisit the adopted standards for TOD corridors.		

Document Page	PDF page	Section	Paragraph	Text	Comment	Language Change	Support
14	22	1.5 Significant Adverse Impacts	2nd	<i>Potential impacts on vehicular movements along arterials in the study area may require additional evaluation before a determination of significance can be made. The overall performance of intersections, such as vehicular delay or volume-to-capacity ratios, should be assessed by comparing the existing and the forecasted performance based on proposed land use and/or transportation infrastructure modifications. If the proposed changes result in intersections not meeting the City's adopted standards, mitigation measures may have to be implemented. Modifications to traffic circulation, volumes, speeds, on street parking, and/or property access may occur as a result of the proposed alternatives, and such impacts may have to be mitigated.</i>	See comments above. It is understood to be a delicate balancing act, but having this paragraph under "Significant Adverse Impacts" does not meet the spirit or actual intent of this planning document. Impacts to vehicular movement should never be considered significantly adverse when doing TOD planning, or we'll never get anywhere. Recommend strking this entire section.		
18	26	2.3.2 Action Alternatives			Recommend these be included in the Executive Summary. In addition, it would have been good to use these as the lens when assessing "impacts" for each mode. That's a heavy lift now - but perhaps it can slightly be done?		
20-21	28-29	2.3.5 Features Common to All Action Alternatives			Consider adding City Line, and it's full routing, and important connections to downtown and SCC, including direct transfer connections to the 25 Division and 6 Cheney, two other High Performance Transit routes.		
26	34	2.6.2 Priorities and Investments		<i>Pursue public/private partnership to deliver neighborhood amenities, shared assets like structured parking, and catalyst development.</i>	Given the investment in BRT along this corridor and through Logan. STA recommends a cap on how much parking can be included in developments within 1/4 mile of BRT Stations. This would include limiting the amount of parking provided to new dormitories, public/private universities, and commercial development. BRT will make a more substantial impact when walk ridership is encouraged within 1/4 mile of BRT stations. Increasing the parking supply within 1/4 mile of each station would neutralize the benefit that BRT delivers, and the financial investment the community has made in the BRT system. Recommend removing 'structured parking' as a priority or investment in the context of this plan. Add text to state that improving the pedestrian network withing 1/4 mile of each station is a high priority and amenity.		
27	35	2.7.2 Priorities and Investments		<i>Green street improvements on Columbus Street between Mission Avenue and Desmet Avenue. Green street improvements typically include wayfinding signage, traffic diverters, and crossing improvements, as well as green stormwater infrastructure (GSI).</i>	Agreed. This is a very hidden issue for ensuring you get a variety and good mix of development happening. Onsite stormwater management requirements are the same for a 25x100 infill lot as they are for that Safeway on Mission and Hamilton. However, it has a greater impact on development of the smaller parcel. You won't get that 'fine-grained' variety in development you desire without some way to help smaller lots manage their stormwater offsite, so the parcel can be fully utilized.		
36	44	3.1.2.5 Alternative 4: TOD Emphasis	1	<i>This alternative provides the highest zoning and density changes of the action alternatives to leverage the multimillion-dollar public investment in the City Line and maximize connectivity and accessibility within the study area.</i>	There are few areas along the City Line like Logan that has this much potential for triggering redevelopment and development of underutilized properties.		
39	47	3.2.1.2 Existing Housing	1	<i>Overall, about 93% of study area residents pay some form of rent for housing, while 7% own their own home (ACS 2020 5-year estimates, table B25003).</i>	Might state that this is consistent with a college neighborhood/town		
39	47	3.2.1.2 Existing Housing	4	<i>Approximately 48% of all households within the study area census tracts are rent burdened, meaning they pay 30% or more of their income for rent (ACS 2021 5-year estimates, table B25106).</i>	This is likely due to the extremely high number of college students, who by definition have a limited or low-income. This is not the same as a neighborhood full of working poor households. Perhaps explain?		
46	54	3.2.2.1 Impacts Common to all Alternatives / (3) Residential Displacement	1	<i>The study area has a much higher proportion of low-income residents and residents with disabilities than the city as a whole; these populations have an elevated risk of displacement.9</i>	again, highly likely these low-income residents are students.		
51	59	3.2.3.7 Reduce or Eliminate Parking Requirements			Agreed. Might take the bold step to severely restrict parking within 1/4 mile of BRT stations. Take the opportunity to realize the investment in BRT and create strong limit on induced parking demand...especially for University Projects. Given the investment in BRT along this corridor and through Logan. STA recommends a cap on how much parking can be included in developments within 1/4 mile of BRT Stations. This would include limiting the amount of parking provided to new dormitories, public/private universities, and commercial development. BRT will make a more substantial impact when walk ridership is encouraged within 1/4 mile of BRT stations. Increasing the parking supply within 1/4 mile of each station would neutralize the benefit that BRT delivers, and the financial investment the community has made in the BRT system.		

Document Page	PDF page	Section	Paragraph	Text	Comment	Language Change	Support
55	63	3.4.1.3 Stormwater Outfalls	2	<i>Current stormwater regulations require new development and redevelopment to mitigate new impervious surfaces and pollution generating surfaces with flow control and/or water quality treatment. Additionally, developments can enhance their stormwater management by working together to partner in providing community amenities when possible.</i>	Here's the math on stormwater requirements for smaller sites. Currently: Partial use of smaller site for development=less housing units + less tax revenue. Alternative Full use of smaller site for development=more housing units+more tax revenue.		
64	72	3.6.1.1 Relevant Policies and Regulations		<i>Socioeconomic Vulnerability</i>	Needs to be measured against the influences of the college-age population to be certain you are not overstating the vulnerability here.		
86	94	3.8.2.2 Alternative 1: No Action	bullet list	<i>Alternative 1 assumes the following improvements will be made:</i>	All the alternatives assume this. It should be clear that the improvements in this bullet list are the baseline for all other improvements.		
89	97	3.9.1.1 1800s	4	<i>The Logan Neighborhood was platted and developed between 1884 and 1890 by Sylvester and Ida Heath and the Jesuits of Gonzaga College. The area developed as a “suburb” of downtown Spokane. The pattern of wide streets and boulevard landscaping were introduced by the priests as a reflection on popular trends in Europe and cities of the eastern United States.</i>	I think some documentation of what the Logan Neighborhood avoided in the 1970s thanks to the efforts of Margaret Hurley is essential. https://www.spokesman.com/stories/2017/dec/18/getting-there-the-woman-who-fought-freeways/		
89	97	3.9.1.1 1800s	4	<i>The Logan Neighborhood was platted and developed between 1884 and 1890 by Sylvester and Ida Heath and the Jesuits of Gonzaga College. The area developed as a “suburb” of downtown Spokane. The pattern of wide streets and boulevard landscaping were introduced by the priests as a reflection on popular trends in Europe and cities of the eastern United States.</i>	Need to mention this as a 'streetcar suburb'. Throughout the document, there's not much mention of this history in the Logan Neighborhood. There used to be a streetcar line on Boone that ran in front of Gonzaga's Admin Building, then up Columbus.. That's the reason Columbus was likely so wide. Also on Mission there were two lines		
96	104	3.10 Transportation			Transportation should be addressed earlier in the document. Transportation should be 3.3, not 3.10		
96	104	3.10.1 Existing Conditions			This is said later as well - but it seems that modes that we want to prioritize (walk, bike, roll and transit) should come before discussions of vehicles and the roadway network. Let's talk first about what we want to prioritize. Starting every discussion with roadway or vehicles gives those modes a primacy that is not intended..		
106	114	3.10.2	1	<i>For this Transportation Technical Report, traffic modeling was not performed to forecast detailed impacts to vehicular traffic.</i>	Traffic modeling was performed for DivisionConnects, and it did look at Hamilton as well (It looked at all N-S streets, both with and w/o the NSC. Jason Lien could point you to the specific points in the documents for that project		
106	114	3.10.2.1 Impacts Common to All Action Alternatives			Add language with refernece to the City Line. While not a specific impact of zoning changes, I think there needs to be discussion of the City Line here, and the benefits it brings to all alternatives. Frequency and span increases mobility and access for all visitors and residents. City Line reduces need for visitor parking, as it opens up U-District and Downtown for parking (where it's plentiful, and only a 2 minute BRT ride away). Provides access to other high-frequency routes directly (25 Division, 6 Cheney) or indirectly (33 Wellesley @ SCC, most other routes at Plaza)		
107	115	4) Public Transportation			Talk more about the transit network, which is important for mobilty and access and supporting car-free/car-lite lifestyles. Also note direct transfer connections to the 25 Division and 6 Cheney, two other High Performance Transit routes.		
109+	117+	3.10.2.x Alternatives			For all of the alternatives there needs to be a re-framing of the impacts, especially how the Roadway Facilities and Vehicular Travel is characterized. The opening line for each alternative makes it read as though every alternative will negatively impact drivers, which should not be the emphasis. Re: traffic, there is both through traffic and local traffic, and no distinction is made between either. The NSC will pull some of the through regional traffic off of Hamilton, which is beneficial (https://www.srtc.org/wp-content/uploads/2022/08/Appendix-N_Phase-2-Land-Use-Modeling-Results-and-Analysis.pdf) and noted in the No Build, but not noted here. I would also re-order so we talk about modes in the order of importance - walk/bike/roll, transit, then roadway.		
109	117	3.10.2.3 / 2) People Who Walk, Bike, or Roll		<i>Traffic calming measures crossing N Hamilton Street could lead to increased bicycle and pedestrian users crossing the roadway</i>	Replace 'could' with, "...will increase safety and comfort, increasing the numbers of bicycle and pedestrian users crossing the road." Let's not equivocate.		
109	117	3.10.2.3 / 2) People Who Walk, Bike, or Roll		<i>Additionally, expanded pedestrian facilities at the E Sharp Avenue and N Hamilton Street intersection may reduce the crossing distance of N Hamilton Street for people walking and on bicycles.</i>	Drop 'may'. It's a physical improvement, it will reduce the crossing distance.		
109	117	3.10.2.3 / 2) People Who Walk, Bike, or Roll		<i>including a new bridge for walking and bicycling across the Spokane River to Riverton Avenue, would improve connectivity for the walking and bicycling</i>	It will - not "would" improve. It will improve connectivity.		

Document Page	PDF page	Section	Paragraph	Text	Comment	Language Change	Support
109	117	3.10.2.3 / 3) Public Transportation		<i>Improved, pedestrian crossings of N Hamilton Street may increase east-west access for transit users</i>	Improved pedestrian crossings will increase east-west access, there is no "may" about it. Also, every alternative discussion of Public Transportation needs to hammer home the idea of the span and frequency of the City Line, as well as the connections available from the City Line. Again, it's important for mobility and access and supporting car-free/car-lite lifestyles		
				<i>which could increase ridership for the route.</i>	See the comment above. A more involved discussion of the City Line and network makes this point better. But the improved pedestrian crossings will definitely improve access to the City Line stations and increase the number of potential riders.		
110	118	3.10.3 Mitigation Strategies			Again, I would re-order so the modes we're emphasizing comes first (walk/bike/roll, transit, roads last)		
110	118	3.10.3.1 Rodway Facilities and Vehicular Traffic		<i>Potential impacts on vehicular movements along arterials in the study area may require additional evaluation and mitigation. The overall performance of intersections, such as vehicular delay or volume-to-capacity ratios, should be assessed by comparing the existing and the forecasted performance based on proposed land use and/or transportation infrastructure modifications. If the proposed changes result in intersections not meeting the City's adopted standards, mitigation measures may have to be implemented. Modifications to traffic circulation, volumes, speeds, on street parking, and/or property access may occur as a result of the proposed alternatives, and such impacts may have to be mitigated.</i>	Edit: Potential impacts on vehicular movements along arterials in the study area may require additional evaluation and mitigation. The overall performance of intersections, such as vehicular delay or volume to capacity ratios, should be assessed by comparing the existing and the forecasted performance based on proposed land use and/or transportation infrastructure modifications. If the proposed changes result in intersections not meeting the City's adopted standards, mitigation measures may have to be implemented. Modifications to traffic circulation, volumes, speeds, on street parking, and/or property access may occur as a result of the proposed alternatives, and such impacts may have to be mitigated.		
110	118			<i>Potential impacts on vehicular movements along arterials in the study area may require additional evaluation and mitigation. The overall performance of intersections, such as vehicular delay or volume-to-capacity ratios, should be assessed by comparing the existing and the forecasted performance based on proposed land use and/or transportation infrastructure modifications. If the proposed changes result in intersections not meeting the City's adopted standards, mitigation measures may have to be implemented. Modifications to traffic circulation, volumes, speeds, on street parking, and/or property access may occur as a result of the proposed alternatives, and such impacts may have to be mitigated.</i>	For the strikethrough (above), this convinces the reader that there is a Pass/Fail for these very math-y sounding measurements, when it's really what the City is comfortable accepting.		
110	118	3.10.3.1 Rodway Facilities and Vehicular Traffic		<i>Potential impacts on vehicular movements along arterials in the study area may require additional evaluation and mitigation. The overall performance of intersections, such as vehicular delay or volume-to-capacity ratios, should be assessed by comparing the existing and the forecasted performance based on proposed land use and/or transportation infrastructure modifications. If the proposed changes result in intersections not meeting the City's adopted standards, mitigation measures may have to be implemented. Modifications to traffic circulation, volumes, speeds, on street parking, and/or property access may occur as a result of the proposed alternatives, and such impacts may have to be mitigated.</i>	I think the best they can say is - regional traffic models show that traffic volumes and vehicle delay increase slightly by 2047, but the overall impacts are unknown, and will be mitigated by improved transit access and transportation options. Then the last sentence is probably fine.		
110	118	3.10.3.1 Rodway Facilities and Vehicular Traffic		<i>If the proposed changes result in intersections not meeting the City's adopted standards, mitigation measures may have to be implemented</i>	Suggest crafting a strategy to revisit the adopted engineering standards for TOD corridors.		

DATE: June 7th, 2023
TO: Maren Murphy, Planning Services
FROM: Bobby Halbig, Street Department
SUBJECT: Plan Review
PROJECT #: South Logan TOD

We have reviewed the design plans and have the following comment(s).

South Logan TOD Plan – Public Draft – May 9, 2023 – Sheet 29

- 1 Under the heading “Some Support”:
 - a. The Street Department does **NOT** support the conversion of “an eastbound general-purpose lane on mission to a two-way protected bike lane”.
 - b. If a two-way protected bike lane is desired, there is sufficient ROW south of the south curbline to construct one. A river crossing will need to be constructed to facilitate.

General

- 2 A signal at Springfield will cause backups to the Hamilton off ramp as it is too close to the Hamilton and Trent signal resulting in increased congestion and degradation of air quality.
- 3 The area is comprised of RSF for actual single families and houses that rent to Gonzaga students. Many of the rental houses are owned by companies so simply changing the zoning will not create a glut in the property values of these rental homes. Typical appraised values for these rental homes are north of \$500,000. The capital needed to purchase the existing property then develop the property will create high rental costs in order for the development to be successful. The low to middle income residents will be priced out of their neighborhood. Students will always try to live off campus regardless of the number of units available on campus.
- 4 Adequate parking will need to be provided as the students get to Spokane typically in a POV so it is not unusual for a rental house to have 4 or more cars. The existing area is a mix of off campus residents as well as residential family housing. Students may use transit once they are here, but they need a place to park their vehicles that get them here.
- 5 Sanitary sewer, storm sewer, and water utility upgrades are necessary to service the increased density planned.
- 6 Natural gas may not be a viable option for heating and cooking in the near future.
- 7 Any lane reductions on Mission need to wait for the NSC completion and multistory building construction and occupancy.

Gerald Okihara, P.E.

Marcus Eveland

Harley Dobson

From: [Edward Bruya](#)
To: [Planning & Development Services South Logan TOD Project](#)
Cc: [Edward Bruya](#)
Subject: South Logan TOD Plan
Date: Thursday, June 8, 2023 3:34:38 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I am a property owner in the neighborhood and would like to thank you for all your hard work on this project. I have had an opportunity to review the various plans and think that they are all great. I personally think that something needs to happen and the "as is" or no action does not serve the neighbor the best use of the land currently.

I will list the ones in order of best option to last option.

1. Alternative 4
2. Alternative 2
3. Alternative 3

I would like to stress that Alternative 4 is by far the best option. It keeps the University in a very nice area and allows for the best opportunity for the south portion of the area to become a very vibrant community and community center that will force the traffic to slow down rapidly off the freeway and allows for the River to become a major showcase backed by high-density residential living and has the potential to really make this area pop with great opportunities for developers and public use of the river.

Thank you for the opportunity to be part of this process to make the neighborhood even greater than it already is.

Ed Bruya

From: [Karen Byrd](#)
To: [Planning & Development Services South Logan TOD Project](#)
Subject: South Logan TOD Comments/Recommendations
Date: Thursday, June 8, 2023 1:07:50 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello,

I have been a Logan resident for 36 years. I have also been extensively involved as a Logan Neighborhood Council Member, Chair, and Chair of the Form Based Code planning efforts. I participated in the Logan NH Center & Corridor and Form Based Code Planning, as well as advocating for historic preservation when additions (duplexes) were added to historic homes and the design did not fit in with our historic neighborhood. In my experience, the residents of the Logan neighborhood have been supportive of higher density for residential or commercial/mixed use only when it is accompanied by clear and appropriate design standards to preserve a sense of our historic place.

After reviewing the four alternatives, I would recommend Alternative #4, **only** if specific design requirements are developed and implemented prior to the land use and zoning changes going into effect. The design regulations need provisions to protect our historic character.

I do not want to see families pushed out of the neighborhood or historic homes torn down.

It is important to avoid a knee jerk or panic response to the shortage of housing by making land use and zoning changes that allow higher density without being mindful of potential unintended consequences, which will occur if design regulations are not added along with these changes. It is okay to take a pause and really be mindful of how to preserve our historic history while providing more housing opportunities. As you know, just increasing land use and zoning density is not going to result in more housing or mixed-use development. The market needs to be there for it.

I also want to make sure that the updated regulations require all new commercial and mixed-use development to be built up to the street and not allow drive through facilities on the front of a business or building. This was a clear goal/regulation the Logan neighborhood supported and was added to the Form Based Code regulations. Pedestrian oriented goals are the priority.

I have always said that the Logan neighborhood is located in the heart of the city and is a perfect place to live, work, and play. We can walk downtown (or bike) on the centennial trail. I do not have to drive to go to a restaurant, coffee place, to the store, or to work. In addition, the wide streets, beautiful historic homes, tree canopy, Mission Park, and a park-like Gonzaga campus, make our neighborhood a wonderful place to live.

I am so excited to have access to the Central Line just a couple of blocks away! This is exactly what we need to help jump start a decrease in auto orientation and well-designed development in our neighborhood and community.

Thank you for your consideration of my recommendations.

Sincerely,

Karen Byrd

From: [John & Rose Flaherty](#)
To: [Planning & Development Services South Logan TOD Project](#)
Subject: South Logan TOD Plan
Date: Thursday, June 8, 2023 5:31:01 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

As a property owner in the Logan Neighborhood I strongly encourage the City of Spokane to pursue the most comprehensive possible option to improve the quality of living in this part of the city. The city has a one-time unique opportunity to think big, and therefore implement a truly great improved living space in Spokane.

I believe this project would provide great value to both the Logan neighborhood and the entire City of Spokane. By providing more flexibility to zoning to allow quality multi-residential housing, with an improved transportation will provide a wonderful model for future city improvements.

I envision a urban village theme, similar to what is happening with the light rail system in the Seattle area: multi-residential housing placed above retail business, within walking distance of Spokane's proposed improved public transportation system.

Please have the courage to act on a large scale. It will provide a tremendous future value for the Logan Neighborhood and all of Spokane. Thank you.

John Flaherty

Property Owner at 1028 E. Mission Avenue

From: [Christopher M. Kelly](#)
To: [Planning & Development Services South Logan TOD Project](#)
Subject: Comments on TOD Plan
Date: Thursday, June 8, 2023 12:08:34 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear South Logan TOD team:

Here are my comments regarding the TOD plan. My recommendation is to stick with the vision of the neighborhood in our Centers and Corridors Plan and the Form-Based Code pilot project. Basically, Alternative 1, the “no-action” plan, would allow just as much density along the new bus route as the highest-density alternative, Alternative 4, but without encroaching on the neighborhood. More detailed notes appear below.

Thanks!
Chris Kelly
(509) 483-2320
cmk@tipperary-press.com

PRIMARY POINT

My primary point is that there’s no reason to encourage developers to buy up and tear down the classic bungalows and Craftsman-style houses that were built in the neighborhood over the last 120 years, just to increase density, when the Hamilton Centers and Corridors Plan, with existing zoning, already has the capacity to hold every single anticipated unit from the TOD option (alternative 4), and more than enough capacity to hold the anticipated increase in units in alternatives 2 & 3.

Neighborhood residents and business and property owners literally spent years developing the plans that seem to be in danger of being tossed out, simply because Spokane Transit decided to route a new bus line through the neighborhood, and the City now seeks to overlay a theoretical concept intended for greenfield and brownfield development on an existing neighborhood.

NOT MUTUALLY EXCLUSIVE

I was told that these alternatives are not one or the other, but that we can combine elements from each. If I had to choose one alternative, it would be the “no action” alternative, which seems to be intentionally discouraged as a choice, because in the South Logan TOD Plan draft from May 9, 2023, it states that under Alternative 1, there would be no increase in housing units.

This is, of course, simply not true. The assumption seems to be that under existing zoning and the form-based code, nobody will ever build anything in the neighborhood, which is unlikely, since the existing zoning

allows 150-foot towers near Trent and 45-foot to 75-foot buildings along Hamilton, corresponding to four- to seven-story buildings. A four-story building with one floor of commercial space and three stories of apartments would accommodate as many as 24 units per lot, and if the building takes up two lots, it would contain 48 units, and 70 units on three lots.

Likewise, a seven-story building with ground-floor commercial would accommodate 36 units on a single lot, 72 units on two lots, and 108 units on 3 lots. It would only have to have ground-floor commercial along Hamilton, not along the full width of the project on the cross street.

I believe current zoning allows this level of density three lots back from Hamilton. This is obviously a back-of-the-envelope estimate, but there are 12 blocks from Trent to Indiana, which would have a maximum potential capacity under the No Action alternative of 2,592 units just along Hamilton, and that's not counting 150-foot buildings in what the plan calls the Southeast Riverfront by Trent and Springfield.

The consultants suggest that, unless developers are allowed to encroach on the neighborhood, they won't build anything. We have to let them tear down the beautiful houses by Mission Park and overshadow the park with taller apartment blocks.

The real situation is that, if they're only allowed to build in the centers and corridor, they will build there. And they have—at the corner of Indiana and Hamilton, a couple of lots back from Hamilton to the west on Nora, and the Matilda Apartments on DeSmet. (This is not unlike the purpose of the Growth Management Act, which encourages more compact development and discourages limitless sprawl. Developers also claim nobody will ever build anything within the existing growth boundaries.)

So it seems unlikely that, although individual developers who only want to build single-use apartment projects on cheaper lots away from Hamilton would vastly prefer having the ability to do so, by buying old homes and tearing them down, other developers will indeed build multi-use projects along Hamilton, as well as residential-only projects two or three lots back—all of which is allowed by current zoning.

My point isn't that 2,592 units will be built along Hamilton; it's that the "no action" alternative will allow significant numbers of units to be built in the study area, certainly as many as Alternatives 1 and 2, and probably many as Alternative 3, and (if you include 10+ story buildings closer to Trent) very possibly as many as Action Alternative 4, the TOD overlay that treats the existing neighborhood as if it were merely vacant land with a park already in place.

So there's actually no need for any alternative other than Alternative 1 to accomplish the goal as set out in the plan to increase density in proximity to the new bus stops.

THE QUARTER-MILE RADIUS

There's nothing magic or scientific about the ¼-mile radius around a transit stop. It's simply a rule of thumb, that people will only walk about four blocks to get to a transit stop. But that doesn't mean everything within four blocks has to be high-density housing. It can be one block in one direction, where there's much more dense development, and four blocks in another direction along a single street, like Hamilton.

For example, if the parking lot in front of Safeway (equivalent to 10 full lots), with 7-story buildings containing 36 units per lot, or 360 units, and each unit, on average, had two residents, there would be 720 more people living within one block or less from the nearest transit stop. The vacant double lot on the northwest corner of Mission and Hamilton, just across the street from Safeway, could hold another 72 units with 142 people, who would only have to walk one block. It's also possible to build townhouses along the currently blank and intimidating back of the Safeway building, which might contain 12 or more units on Columbus, adding up to some 900 people. And that's just at the corner of Mission and Hamilton.

Incidentally, this exact concept has already been successfully implemented in the Avalon Meydenbauer building in Bellevue, which has a 54,000 square foot Safeway on the ground floor and 368 apartments above, plus another 19,000 square feet of ground-floor commercial space, along with underground and surface parking.

CHANGES PROPOSED IN THE "ACTION" ALTERNATIVES CAN ALSO BE DONE IN THE "NO-ACTION" ALTERNATIVE

Although the "no-action" alternative seems to suggest that nothing would happen in the neighborhood if that alternative is chosen, there would seem to be no reason that changes proposed in the "action" alternatives, other than increasing density throughout the neighborhood, destroying its character, could not also be implemented, even if the "no-action" alternative is chosen. Of course Alternative 1 would allow a bike bridge over the river on the Sharp Avenue alignment. Of course it would allow a non-grade pedestrian crossing to connect Mission Park to the Centennial Trail heading to Upriver Drive. It would allow a traffic signal at Springfield. It would allow a shared parking structure by Springfield, and 150-foot mixed-use buildings.

If the City wanted to rezone parts of the Southeast Riverfront area from General Commercial to Centers and Corridors Employment Center, that would be fully compatible with the neighborhood's existing Centers and Corridors plan.

So the "no-action" alternative can have just as much action, and just as much density, as even the most dense of the alternatives.

LESS-COMPELLING IDEAS

Taking out one lane of Mission for a bike lane is not a very good idea, especially if there's a new bike bridge across the river along Sharp. You can already ride bikes quite safely on any of the side streets and still cross at a signal, if you want. And you can already ride on sidewalks along Mission.

DO NOT CAVE IN TO DEVELOPERS WHO DON'T WANT TO INCLUDE GROUND-FLOOR COMMERCIAL ALONG HAMILTON

The whole point of the form-based code was to make Hamilton more vibrant and walkable. A whole bunch of key-card entryways and blank walls along Hamilton will do nothing to make the street comfortable to walk along. A walkable corridor has places you can walk to: boutiques, barber shops, ice cream parlors, fitness centers, day cares. The developers who don't want to build these spaces don't live in the neighborhood, and quite frankly, don't care about the neighborhood or about walkability. That's why the form-based code was designed that way. We want developers who care.

WILL DEVELOPERS BUILD MIXED-USE BUILDINGS?

It seems as though the consultants are more concerned about meeting the needs of developers than meeting the needs of neighborhood and city residents. The point of all the planning conducted by the neighborhood and City Planning over almost three decades was to contain high-density development in the centers and corridors to protect the character of the rest of the neighborhood (which already has a significant number of apartment buildings and homes converted into multi-family housing).

In the rest of the country, and even in Spokane in the past, commercial streets like Hamilton and Monroe frequently had mixed-use buildings. Jack and Dan's is a two-story example of that. There used to be a six-story building with ground-floor commercial on the southwest corner of Monroe and Indiana. (It burned down and was eventually replaced by a small restaurant in a big parking lot.) The only significant development project on Hamilton in recent years, the Matilda, is exactly that kind of development—three stories of apartments over commercial space.

One of the consultants said that there's no demand for commercial space along Hamilton, so developers are unwilling to include ground-floor commercial, and the form-based code developed by the neighborhood and City Planning should be ignored. Maybe a developer told him that. On the contrary, there is little, if any, vacant commercial space in the entire study area, and several new businesses have replaced other businesses that moved or went out of business. By making the corridor higher density, with a few thousand more walk-in customers for local businesses living right upstairs or a short walk away, it's highly likely that demand for commercial space will increase.

CENTERS AND CORRIDORS

Around the turn of the century, thousands of Spokane residents engaged in planning designed expressly to promote density. The Logan Neighborhood Council created a plan to encourage high-density development in a barbell centered on Hamilton, with bulges near Trent and North Foothills. The purpose was to concentrate development in these areas, taking pressure off the rest of the neighborhood.

Prior to that process, the City had zoned the neighborhood for two or three units per lot, and one developer in particular took advantage of the allowance of a second unit, which had been intended to allow granny flats over the garage, for example, to throw up massive, barracks-style buildings taking up the entire back yard of grand old houses, which counted as one-bedroom units, even though they all had up to a dozen tenants.

Instead of granny flats, or larger developments that some may have envisioned as turning the area into a kind of Georgetown in Washington, DC, or Back Bay in Boston, what we ended up with was cookie-cutter, off-the-shelf, unfriendly-to-the-street (and to the neighbors), schlocky, developer-beige, almost windowless apartment blocks with no landscaping. Basically, the slumlords moved in. That's why we were so intent on keeping development along the Hamilton corridor and in the ends of the barbell, where there is already available or underutilized land and where commercial buildings and apartment blocks would be welcomed.

Meanwhile, while allegedly promoting high-density, pedestrian-oriented development along Hamilton, the City allowed one of only four drive-through-only McDonald's worldwide to be built at Augusta and Hamilton, and a drive-through-only Starbucks at Indiana and Hamilton, and allowed another coffeehouse at Baldwin and Hamilton to tear down an existing (and cute) small commercial building, which had once been a restaurant like Dolly's and later a barbershop, replacing it with parking.

This is the City's actual legacy to the neighborhood. In the case of Starbucks and McDonald's, other cities have found a way to enforce development guidelines that require these sorts of developments to be ground-floor businesses in multi-story buildings with apartments above—exactly what the TOD concept envisioned.

Now it seems that, because the City was lax in creating zoning and regulations to implement Centers and Corridors (both the McDonald's and Starbucks developments happened 15-20 years after the Spokane Horizons process), instead of having up to 72 apartments on each of these corners, above a Starbucks and a McDonald's, we have a coffee shack and a hamburger shack on a large paved lot, with no indoor seating, and where walkup customers (if there are any) have to navigate across parking lots and curb cuts and car traffic to try to get something to eat or drink. Hardly walkable. Hardly pedestrian-oriented. They eliminated even the possibility of

higher density on those lots.

HIGH DENSITY ON CORRIDORS TO PROTECT ADJACENT RESIDENTIAL ZONES

If you've ever been to Tokyo, you may have seen how a street like Hamilton could have tall commercial and apartment buildings, while just a block behind them are quiet neighborhoods of traditional Japanese houses. The taller buildings along the corridor act as sound walls, while providing access to the kinds of shops and restaurants made possible by higher density.

Likewise in Vienna, streetcars lines run along commercial streets with midrise buildings that include street-level businesses and upper-story apartments, many of which are student dormitories, and as in Tokyo, the blocks behind are filled with single-family residential buildings. It's the best of both worlds—both high-intensity urban and moderate-density residential.

Tokyo's density is over 16,000 people per square mile. Vienna's is over 11,000 per square mile. Spokane's is 3,300.

We can increase our density significantly, while protecting the bulk of our existing neighborhoods, simply by following the Centers and Corridors approach developed by the citizens of Spokane and city planners. (I'd estimate that we can double the city's population within the current city limits with this approach.)

I'm sorry I wasn't able to provide an analysis of the TOD plan point by point, but wanted to get this to you before the deadline, so please forgive me if it seems a bit disorganized. Let me know if you have any questions.

From: [Murphy, Maren](#)
To: [Downey, KayCee](#)
Subject: FW: RHD 75
Date: Thursday, June 8, 2023 10:08:31 AM

Hi KayCee,

Please include the most recent email from June 8 at 9:00 am as public comment from Ken Sammons with Gonzaga. I have already replied to Ken.

Thank you,
Maren

Maren Murphy, AICP (she/her) | City of Spokane | Senior Planner | Planning Services
509-625-6737 | main 509-625-6500 | mmurphy@spokanecity.org | my.spokanecity.org

From: Sammons, Ken <sammons@gonzaga.edu>
Sent: Thursday, June 8, 2023 9:00 AM
To: Murphy, Maren <mmurphy@spokanecity.org>; Black, Tirrell <tblack@spokanecity.org>
Cc: Murphy, Chuck <murphyc@gonzaga.edu>
Subject: RE: RHD 75

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Thanks. Yes, as discussed, the best height limit for University development would be RHD 75. This would allow us to construct student housing similar to other existing projects across the Campus. Ken

From: Murphy, Maren <mmurphy@spokanecity.org>
Sent: Thursday, June 8, 2023 8:54 AM
To: Sammons, Ken <sammons@gonzaga.edu>; Black, Tirrell <tblack@spokanecity.org>
Cc: Murphy, Chuck <murphyc@gonzaga.edu>
Subject: RE: RHD 75

Hi Ken,

Thanks for the email. We have a height suggestion of 70 in the code now, so this would be on our 'code fix list' for implementation to make that adjustment. We have also heard from our consultant that 75 would be a better height in the market for '5 over 1' development, so conceptually we can suggest this.

I know your email was a question, but it would be helpful to record in the public comment if you are able to provide a comment today outlining this—that 75 feet would best accommodate housing development.

Thanks,
Maren

Maren Murphy, AICP (she/her) | City of Spokane | Senior Planner | Planning Services
509-625-6737 | main 509-625-6500 | mmurphy@spokanecity.org | my.spokanecity.org

From: Sammons, Ken <sammons@gonzaga.edu>

Sent: Wednesday, June 7, 2023 4:16 PM

To: Murphy, Maren <mmurphy@spokanecity.org>; Black, Tirrell <tblack@spokanecity.org>

Cc: Murphy, Chuck <murphyc@gonzaga.edu>

Subject: RHD 75

[CAUTION - EXTERNAL EMAIL - Verify Sender]

For the South Logan TOD, are we using a rezone to RHD 75 or RHD 70? I was just going over some “test fit” files for phase 2 sophomore housing, and see that the potential roof height for a 5 story facility housing 292 beds, was an overall height to the roof ridge of 74’-11”. Don’t want to rezone and be 5’ short. Ken

Murphy, Maren

From: Duvall, Megan
Sent: Tuesday, June 13, 2023 4:59 PM
To: Black, Tirrell
Cc: Murphy, Maren
Subject: Supplement to Historic Preservation Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Tirrell,

Thank you for the opportunity to submit a supplement to our agency comments on the DEIS for the South Logan TOD Project. It appears that the Historic Preservation Department did receive the notice for the South Logan TOD DS & Scoping on 9/8/22. When a draft EIS and a draft of the South Logan TOD Plan was circulated to the public, we noted the makeup of the South Logan Project Advisory Committee did not include participation from the Historic Preservation Department. At that point, we did not realize that we had been noticed 8 months prior. We would like to correct the record and acknowledge that we were noticed at the beginning of the project cycle.



Megan Duvall

Historic Preservation Officer
City/County of Spokane
808 W. Spokane Falls Boulevard
Spokane, WA 99201-3329
509.625.6543 Office Cell Phone: 509.435.8260
mduvall@spokanecity.org | www.historicspokane.org



SPOKANE CITY | COUNTY HISTORIC PRESERVATION OFFICE

*Providing historic property protection and development
services to the City of Spokane and Spokane County.*

June 8, 2023

City of Spokane Planning Department
Attn: Maren Murphy
808 W. Spokane Falls Blvd
Spokane, WA 99201

Dear Maren,

Thank you for the opportunity to provide comment on the Draft South Logan TOD Plan and Draft Environmental Impact Statement (EIS). It is worth noting that our agency, the Spokane Historic Preservation Office, was not included in the scoping of the EIS. According to state law as detailed in RCW 43.21C.031, “the responsible official shall consult with agencies and the public to identify” environmental impacts. Impacts to historic and cultural resources are a clearly identified factor that must be assessed when determining environmental impacts. The proposed boundary for this project includes one national register historic district and eleven properties that are listed on the Spokane Register of Historic Places. Additionally, the neighborhood is largely made up of building stock that meets the age criteria for listing on the register.

Since the plan has an area of potential effect that includes long-identified historic resources and substantial historic building stock, it seems that our office should have been included in the scoping process for the EIS so that impacts to historic resources could have been considered early in the process. Furthermore, our office was not included in the Project Advisory Committee until after the draft documents were submitted to the public for comment. Had our office been engaged at an earlier point in the process, we would have shared our expertise as it relates to historic preservation and compatible infill, which in our opinion would have resulted in a more solid draft. Nonetheless, since our office requested a greater level of participation in the project, the planning team has been receptive of our comments and feedback, including scheduling and participating in a one-on-one meeting with our office. We appreciate the collaboration.

Our comments here have been split into three sections, one for the plan, one for the EIS, and one more generally for displacement risks:

Comments on the Draft South Logan TOD Plan:

In the summary of survey responses that were elicited to inform the draft, one of the responses to the question “what do you like about the area?” stood out to our office. Survey respondents stated that South Logan’s “mix of Gonzaga University, historic buildings, and relative affordability give it a unique character all of its own” (page 30, using pdf page numbers as the on-page pagination is not linear in the plan document). These respondents defined the character of the neighborhood as being higher education-

driven and filled with historic properties for businesses and living, many of which are affordable due to their age, composition, and location.

The experts saw the same thing as the survey respondents. Makers, the planning and design consultants who prepared the plan, identified “well-preserved historic buildings” and a “well-designed historic park” as assets for the neighborhood (page 13). They reinforced the significance of those assets in the community design goals of the plan. The first goal, CD-1, aspires to maintain the neighborhood’s sense of place by building on the area’s “context and history with integrity.” The second goal, CD-2, presents a strong guiding statement on human-scaled development in which historic preservation is integral: “Maintain and enhance the neighborhood’s human-scaled development patterns, with attractive and well-connected walking routes, activated streetscapes, preserved historic buildings and diverse architectural styles, and ample greenery, trees, and natural stormwater treatment features” (page 64).

Our office appreciates that survey respondents recognized that historic buildings and spaces are character defining features of their neighborhood. And we appreciate that the goals set forth by the consultant in the community design section of the plan are reflective of the survey responses. However, our office is concerned that the policies laid out under goals CD-1 and CD-2 are not sufficiently defined nor strong enough to achieve the stated goals. Only two of the six policies are related to historic preservation:

- Work with property owners to identify funding for the preservation and maintenance of historic buildings; look for opportunities to share stories of the neighborhood’s past in public realm improvements.
- Review and revise residential zoning codes to optimize outcomes for compatible infill development. Consider reductions in off-street parking requirements, greater flexibility on density limits, and encouraging single-stair multifamily residential buildings

The first preservation-related policy, which relates to identifying funding for property owners of historic buildings, ought to include that incentives which are already available (Special Tax Valuation, Façade Improvement Grant, Federal HTC) should be retained and strengthened. The policy would be stronger if it indicated specific sources of additional funding or policy revisions that would strengthen existing incentives, like new sources of contributions to the city’s Historic Preservation Incentives Fund or Special Tax Valuation reform. Additionally, the policy would be stronger if it included an outreach campaign to property owners to encourage them to list their historically significant properties on the Spokane Register of Historic Places before they are threatened by demolition. It may also be worthwhile to add a clause that the Historic Preservation Office should be consulted when sharing stories of the neighborhood’s past in public realm improvements.

The second preservation-related policy, which relates to compatible infill, has a clear policy statement to revise and review zoning codes to foster compatible infill. However, the examples provided to achieve compatible infill ought to be reconsidered. It is unclear how reducing off-street parking, providing more flexibility on density limits, or allowing single stair multifamily will optimize outcomes for compatible infill development. (There is some argument for single stair construction as it may open options for historic designs of missing middle that are no longer allowed without this reform.) Our office suggests that implementing design standards would be a much more effective policy to optimize outcomes for compatible infill development. These design standards should be crafted collaboratively between city agencies and, most importantly, residents and business owners in the area. The design standards could include factors like setbacks, roof forms, orientation on the lot, location of the primary entrance, fenestration patterns on the street-facing façades, and size/height of accessory structures in relation to primary structures (the latter is feedback directly from the neighborhood).

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Also, a side note on CD-4, which relates to indoor community spaces. One possible opportunity for a new indoor community space is the gymnasium building that was historically associated with Holy Names Academy. The building is located at 1114 South Superior Street just to the south of the Academy Apartments and west of the Gonzaga Tennis Center. The interior is in disrepair, but the exterior is in excellent condition. The building is owned by Gonzaga University.

Finally, our office's preference among the three action alternatives is Alternative 3, because it seems to be most respectful of historic resources in focusing the most intense new development toward the south end of the area. If some hybrid of the alternatives were to be selected, our office would advocate for a specific zoning classification to be applied to the areas that have previously been recognized as historically significant or that are proximate to previously recognized historic resources. Some research would be necessary to clearly define that area, but some initial suggestions are the Mission Avenue corridor, the streets around Mission Park, and the corner of Hamilton and Sharp.

Comments on Draft South Logan TOD Plan Environmental Impact Statement:

Our office appreciates that the Environmental Impact Statement recognizes that "aesthetic impacts may be experienced most in existing low density residential areas" which could result in "changes to the local aesthetic landscape" (page 10, using on-page pagination for the EIS). Our office also appreciates that the EIS identifies (in part) design standards and design review as the way to limit significant aesthetic impacts. It states that:

"Beyond those provisions making the interim housing ordinance permanent (including applicable multifamily design standards), additional changes to the zoning district design standards could be made to further promote design that retains and enhances the established character of the residential neighborhoods. Examples could further address façade articulation, roofline treatments, entry design, and front yard landscaping." (page 13)

Although our office does not consider front yard landscaping to be critical for optimizing outcomes for compatible infill, we appreciate the rest of the potential factors and would encourage that a refined version of this language be added to the plan itself as a policy under the community design goals, probably CD-2.

The EIS claims that "proposed zoning provisions and design standards will help preserve designated historic structures and ensure that new development includes some measures that help promote compatibility with the surrounding context." Our office is in agreement with that statement; however, it is critical that the policy of implementing design standards to optimize outcomes for compatible infill be added to the plan itself under the community design goals.

A side note, the last sentence of paragraph one on page 13 under section 1.4.10.1 alternative 3 mitigation is incomplete. The last word is "some."

Comments on Displacement Risk Strategies:

There is significant discussion in the plan and in the EIS about the risks of displacement and the impact that the plan could have on accelerating displacement. Our office appreciates this discussion and the identification of the causal relationship between changes in zoning and the loss of affordable housing through redevelopment. However, we would like to see the language "naturally occurring affordable

housing” (NOAH) used in the plan and EIS to be consistent with the Housing Action Plan which uses the term.

One of the anti-displacement strategies from the memo, which is outlined as a policy in the plan, is to “work strategically with key property owners and developers to negotiate Development Agreements for key parcels, especially those which are home to key community businesses vulnerable to displacement” (page 62). Our office would like to see this policy of strategic negotiation extend to potentially historically significant properties (especially those that contain NOAH) and legacy businesses where the building may be at risk of demolition.

Another anti-displacement strategy from the memo which is outlined as a policy in the plan is the use of a Public Development Authority to encourage development. Our office would like to see this policy expanded or modified to include a discussion of Preservation Development Authorities. These entities are similar to a public development authority but are more specifically used where there is a risk of displacement. The city’s displacement risk assessment and the Department of Commerce recommend using Preservation Development Authorities (<https://app.leg.wa.gov/RCW/default.aspx?cite=43.167>) to help reduce risks of displacement while guiding community preservation and development.

Thank you for considering our comments as you work to refine the plan and EIS for final passage. We are happy to consult further as you refine the drafts.

Best,

A handwritten signature in blue ink, appearing to read 'Logan Camporeale', with a stylized flourish at the end.

Logan Camporeale
Historic Preservation Specialist

From: [Figg, Greg](#)
To: [Planning & Development Services South Logan TOD Project](#)
Cc: [kayc](#); [Murphy, Maren](#); [Note, Inga](#); [Black, Tirrell](#)
Subject: South Logan TOD/Planned Action DEIS Comments
Date: Thursday, June 8, 2023 3:01:21 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Good Afternoon All,

Thank you for the opportunity to review the above plan and Draft Environmental Impact Statement (DEIS). WSDOT is supportive of this TOD plan as it takes steps to provide transportation efficient development that can reduce overall vehicle miles travelled.

In follow up to our conversation earlier today, we believe the transportation element needs to be refined to identify the transportation impacts associated with the planned action component of the plan. In particular, WSDOT requests that a quantitative element be included to identify the traffic volume increases associated with this action at the Trent and Hamilton intersection and the Hamilton and I-90 Interchange. Once the changes in traffic volumes have been identified and analyzed multimodal mitigating measures that may be necessary should be proposed. Should you have any questions on this matter, please do not hesitate to contact us.

Best Regards,

Greg Figg
Development Services Manager
WSDOT Eastern Region
(509) 324-6199



June 8, 2023

Maren Murphy, AICP
Senior Planner
City of Spokane
808 W Spokane Falls Blvd
Spokane, WA 99201

Dear Maren,

On behalf of the University District (UD), I wish to express our appreciation and support for the exceptional work you and your team have accomplished thus far on the South Logan TOD Study. We are especially grateful for the time you have spent listening to and informing our stakeholders, committees, and board.

We know you are seeking input on your TOD Study and are pleased to endorse these particular aspects of the Study:

- A new ped/bike crossing bridge at Sharp over the Spokane River to better link Gonzaga University to the Chief Garry neighborhood to the east. This proposed interchange will better connect the UD with the socio-economically isolated portions of Chief Garry along the Spokane River.
- The preservation of and/or improved public access to land adjacent to the Spokane River in all locations.
- Under sub-area strategies, the UD supports enhanced wayfinding for the non-motorized boat launch and fishing access near the SIERR building and the completion of the North Bank trail to increase public access to and along the river.
- A UD/City park development on City-owned land along Superior Avenue.
- The addition of a traffic signal at Springfield and Hamilton for better connectivity between retail/restaurants near the No-Li Brewhouse and Gonzaga's McCarthy Athletic Center.
- The overall greater intensification of mixed uses (150'), if approximately 30% of conservation/open space is preserved particularly along the River.
- Creative approaches/strategies to encourage anti-displacement in the UD.
- Any and all green street improvements: wayfinding signage, traffic diverters, crossing improvements, and green stormwater infrastructure (GSI).



We are excited about so many new possibilities and improvements in the South Logan neighborhood and are eager to be helpful in your ongoing process. Please don't hesitate to reach out if we can be of assistance.

Sincerely,

Juliet Sinisterra, CEO
509-255-8093, jsinisterra@spokaneudistrict.org

From: [Murphy, Maren](#)
To: [Downey, KayCee](#)
Subject: Fwd: FW: Comment Period for South Logan TOD Documents Ends Thursday, June 8
Date: Friday, June 9, 2023 9:55:04 AM

Another comment

Maren Murphy, AICP (*she/her*) | Senior Planner | Planning Services
[509-625-6737](tel:509-625-6737) | mmurphy@spokanecity.org | spokanecity.org

From: Amber Waldref <amber.waldref@gmail.com>
Sent: Friday, June 9, 2023 8:41:29 AM
To: Murphy, Maren <mmurphy@spokanecity.org>
Subject: Re: FW: Comment Period for South Logan TOD Documents Ends Thursday, June 8

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Good morning, Maren.

Thank you for reaching out! I was out of town the last two days at a WSU Advisory Board meeting.

Here are a few personal comments as a neighborhood resident that I wanted to share after the Logan neighborhood meeting you held a few weeks back:

1. I prefer the Southeast Riverfront alternative because it activates a lot of underutilized property and the River and the whole southern portion of Hamilton Corridor.
I support rezoning from General Commercial to Centers and Corridors, but NOT CC Employment Center. The last time I checked the CC Employment Center Zoning was very weak in terms of supporting pedestrians and activating the street.
2. I would suggest changing the C area to make that higher density as in Alternative #2 to add some more density to this alternative #3.
3. Design standards are critical to ensuring a good blend of new development with the historical character of Logan neighborhood. I would suggest a basic design standard for all buildings that matches the turn of the century flavor. I believe some basic standards are being developed at the City, but I believe these should be mandatory.
4. It is critical that new development does not push out affordable housing in the neighborhood. There must be a mechanism in place to ensure all new developments include affordable housing - perhaps it is an incentive to build taller/bigger? Perhaps it is required if you remove a current residence. We need to work on this more closely to avoid gentrification.

That's all for now -- thank you for all your hard work on this plan.

Amber Waldref
1204 E Baldwin Ave.
Spokane, WA 99207

From: [Murphy, Maren](#)
To: [Quinn-Hurst, Colin](#)
Cc: [Dave Mannino](#); [Downey, KayCee](#)
Subject: RE: DEIS Comment: Mission Park Bus Stop
Date: Thursday, June 1, 2023 8:53:22 AM

Hi Colin and Dave,

Thank you for sharing the public comment. We will include this in the public record as part of the South Logan draft plan public comment period.

Thank you,
Maren

-----Original Message-----

From: Quinn-Hurst, Colin <cquinnhurst@spokanecity.org>
Sent: Thursday, June 1, 2023 8:24 AM
To: Murphy, Maren <mmurphy@spokanecity.org>
Cc: Dave Mannino <manninos@centurylink.net>
Subject: DEIS Comment: Mission Park Bus Stop

Hi Maren,

Please see Dave's comments below as a public comment on the Draft EIS.

For the past year, with his guidance and feedback from Parks and STA, we've been looking into ways to improve the ped/bike interactions at the Mission Park City Line bus stop, location and original email attached and included in the email thread below. Location: <https://goo.gl/maps/a2S2yWNUkvjwxCNp9>.

This week Dave pointed out that a broader improvement of the full pathway through Mission Park would improve access to the bus stop for all users, and that this would fit with the South Logan TOD recommendations to improve walking and bicycling along Mission Avenue.

- This general concept is listed in the Draft EIS on page 32 under Alternative 2 - 2.5.2 Priorities and Investments, and on page 34 under Alternative 4, and on page 95 - 3.8.2.3 Alternative 2: Hamilton Crossing:
- "Study options for improved east-west bicycle and walking connections across and through north end of neighborhood on Mission Avenue." Pgs. 34 and 35
- "This alternative proposes to study options for improving river crossings for bicycles and pedestrians in the vicinity of Mission Park. This includes enhancing the connection along Mission Avenue or constructing a new walking/biking/rolling bridge at Sharp Avenue." Pg. 95
- <https://static.spokanecity.org/documents/projects/south-logan-tod/south-logan-tod-deis-2023-05-12.pdf>

This comment, to improve access to and around the Mission Park City Line transit station for all users, would be supportive of those recommendations in the Draft EIS, but expand it slightly to reference Mission Park transit station access.

Dave can also follow-up with additional thoughts or comments, or a more formal public comment if that would be helpful.

Thank you!

Colin

-----Original Message-----



June 8, 2023

City of Spokane Planning Department
808 W. Spokane Falls Blvd.
Spokane, WA 99201

Dear Mrs. Murphy & the South Logan TOD project team,

Thank you for providing the City of Spokane Parks and Recreation Division an opportunity to review and comment on the draft South Logan TOD Plan and the Draft Environmental Impact Statement (DEIS). Speaking broadly, T.O.D. and increased housing density near existing developed and undeveloped public park facilities is highly supported by current city park planning documents. Spokane Parks generally supports proposed actions to:

- Increase housing capacity near Mission Park,
- Enhance connectivity, accessibility, and mobility within South Logan and the adjacent river corridor,
- Improve east-west bicycle and walking connections between the study area and the Chief Garry neighborhood,
- Transform the Southeast Riverfront Area, maximizing riverfront connections, open space improvements, and access within the study area,
- Form public / private partnerships within the area on either side of the Centennial Trail within the study area.

Speaking specifically, land use goals LU-3, LU-4, LU-7, LU-8, CT-1, CT-3, CT-4, and SUS-1 are well supported by current park planning documents, and the Parks Division is supportive of future partnerships consistent with these goals.

In reviewing the project DEIS section '1.4.9—Recreation', the Park Division is concerned that if not properly planned or mitigated, increased development may increase park usage such that facilities deteriorate park assets more quickly than the parks division is capable of replacing said improvements. While we support the increase in usage in these public parks and trails, we understand that without specific emphasis within the project area, the increased redevelopment will not result in an increase to the park maintenance budget as required to maintain the desired park level of service for new residents and visitors. As a result, we recommend the TOD plan include a recommendation for establishment of specific mitigating factors to generate appropriate park and trail maintenance funding. Specifically, we recommend establishment of 'park impact fees' within the study boundary, or establishment of a development district maintenance fee (B.I.D., etc.) in order provide a mechanism for maintaining and upgrading park infrastructure and assets as recommended within the DEIS.

Furthermore, we support the exploration and establishment of public/private partnerships to enhance study area recreational opportunities and recommend specific language be added to address the need for these partnerships not only to fund implementation of improvements to park space and the Centennial Trail Corridor, but to fund ongoing maintenance of these improved spaces and facilities. To ensure the long term success of these valuable public improvements, it is critical that the private enterprise constructed adjacent to the public recreational amenities provide dedicated means to maintain the enhanced spaces.

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In reviewing the potential/private partnerships identified within the DEIS as potential mitigation within the study area, Spokane Parks recommends removing 'Collaboration with St. Aloysius regarding the accessibility of their playfield for public use during non-school / event hours'. While the City previously partnered with St. Aloysius School for many years to secure public access to this privately owned facility, changes to Washington State insurance law no longer permits such a partnership and the leadership of the school is not interested in permitting public use of this space. As this mitigation is likely not currently feasible, and other means of mitigation should be considered.

Thank you again for the opportunity to review and comment on this plan. The City of Spokane Parks and Recreation Division is highly supportive of the South Logan TOD recommendations, so long as additional language can be provided which strongly encourages or requires new development and re-development significantly contribute to the increased maintenance of existing and new public recreational spaces through impact fee, business improvement district, or public/private partnership.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nick Hamad', written over a horizontal line.

Nick Hamad, PLA
Park Planning and Development Manager
City of Spokane Parks and Recreation