



# Spokane Plan Commission Agenda

Regular Meeting  
Wednesday, July 09, 2025  
2:00 PM

Hybrid - Council Briefing Center / Microsoft Teams  
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. Roll Call   | Planning Staff   |
|             | 2. Approve <a href="#">6/25/2025</a> meeting minutes | All              |
|             | 3. City Council Liaison Report                       | CM Kitty Klitzke |
|             | 4. Community Assembly Liaison Report                 | Mary Winkes      |
|             | 5. President Report                                  | Jesse Bank       |
|             | 6. Secretary Report                                  | Spencer Gardner  |
|             | 7. Transportation Commission Liaison Report          | Ryan Patterson   |
|             | 8. Approval of current agenda                        |                  |

## Workshops:

|             |  |                |
|-------------|--|----------------|
| 2:20 – 2:45 | 1. <a href="#">Excelsior Wellness Development Agreement Workshop</a> | Kevin Freibott |
| 2:45 – 3:30 | <a href="#">*Request for Hearing - Excelsior Wellness</a>            |                |
|             | 2. <a href="#">Housing by Income Bracket (PlanSpokane 2046)</a>      | Kevin Freibott |

**Adjournment: The next PC meeting will be held on Wednesday, July 23, 2025.**

\*Items denoted with an asterisk may include final action taken by the Commission. Written public comments will be accepted on these items up to one hour prior to the start of the meeting. Verbal testimony may also be accepted during the meeting.

**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 Human Resources at 509.625.6373, 808 W. Spokane Falls Blvd., Spokane, WA, 99201; or [ddecorde@spokanecity.org](mailto:ddecorde@spokanecity.org). Persons who are deaf or hard of hearing may contact Human Resources through the Washington Relay Service at 7-1-1. Please contact us forty-eight (48) hours before the meeting date.

# Second Wednesday - Plan Commission Meeting Information

Wednesday, July 9, 2025

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.

## Microsoft Teams

Join on your computer, mobile app or room device

[Click here to join the 2<sup>nd</sup> Wednesday meeting](#)

Meeting ID: 220 747 363 981

Passcode: Sk3sc6L3

[Download Teams](#) | [Join on the web](#)

Join with a video conferencing device

[cityofspokane@m.webex.com](mailto:cityofspokane@m.webex.com)

Video Conference ID: 119 411 774 7

[Alternate VTC instructions](#)

**Or call in (audio only)**

[+1 323-618-1887,,215215222#](#) United States, Los Angeles

Phone Conference ID: 215 215 222#

[Find a local number](#) | [Reset PIN](#)

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](mailto:plancommission@spokanecity.org). Written public comments will be accepted up to one hour prior to the start of the meeting.

**The audio proceedings of the Plan Commission meetings will be recorded and are available online.**

# Plan Commission

## Upcoming Agenda Items (All items are subject to change)

| July 23, 2025 - Plan Commission (90 minutes available) Hybrid |  |                                  |
|---|--|----------------------------------|
| Workshop  |  |                                  |
| Time  | Item   | Presenter                        |
| 2:00 – 2:20   | Meeting Briefing   | Plan Commission                  |
| 2:20 - 3:30   | Racially Disparate Impacts and Housing<br>( <a href="#">PlanSpokane 2046</a> ) | Maren Murphy & Brandon Whitmarsh |
|   | Cannon Hill Park Addition Historic District                                    | Megal Duvall/Nathan South        |
| 3:30 - 3:45   | Off-Premises Signs (Tentative)   | Adam McDaniel                    |
| 3:45 – 4:00   | Transition to Chambers   |                                  |
| Hearing Items   |  |                                  |
| 4:00 - TBD  | Addressing Code Revisions  | Spencer Gardner                  |
| TBD   | Streets, Alleys, and Driveways Adjustments                                     | Spencer Gardner                  |

| August 13, 2025 - Plan Commission (90 minutes available) Hybrid |   |                 |
|---|---|-----------------|
| Workshop  |   |                 |
| Time  | Item  | Presenter       |
| 2:00 – 2:20   | Meeting Briefing                                    | Plan Commission |
| 2:20 - 3:20   | <a href="#">PlanSpokane 2046</a> : Chapter Review   | Staff           |
| 3:20 – 3:45   | Tentative Workshop                                  |                 |
| 3:45 – 4:00   | Transition to Chambers                              |                 |
| Hearing Items   |   |                 |
| 4:00 - TBD  | Hearing on Excelsior Wellness Development Agreement | Kevin Freibott  |

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# Spokane Plan Commission - Draft Minutes

Wednesday, June 25, 2025

Hybrid Meeting in Council Briefing Center & Microsoft Teams Teleconference

Meeting Minutes: Plan Commission Workshop called to order at 2:02 pm by President Jesse Bank.

**Public Comment:** Citizens are invited to address the Plan Commission on any topic not on the agenda. 3 Minutes each.

- None

## **Attendance for Plan Commission Workshop:**

- Commission Members Present: President Jesse Bank, VP Ryan Patterson, David Edwards, Greg Francis, Amber Lenhart, Carole Shook, Tim Williams, Jill Yotz
- Commission Members Not Present: Tyler Tamoush
- *Quorum Present:* Yes
- Non-Voting Members Present: Mary Winkes (Community Assembly Liaison)
- Non-Voting Members Not present: Kitty Klitzke (Council Member Liaison)
- Staff Members Present: Angie McCall, Spencer Gardner, Tirrell Black, Maren Murphy, Kevin Freibott, KayCee Downey, Logan Callen, Sarah Sirott, Jackie Johnsen, Brandon Whitmarsh, Tim Thompson, Tim Fischer

**Minutes:** Minutes from 6/11/2025 approved 7-0-1.

## **Briefing Session:**

- **Commission President Report - Jesse Bank**
  - Jesse stated that there are several applications for the open position on the Plan Commission. He asked if any current commissioners would be willing to volunteer to work with staff to interview candidates and make recommendations that then go to the Mayor's office. Greg Francis, Amber Lenhart and Jesse Bank volunteered.
- **Transportation Commission Liaison Report - Ryan Patterson**
  - Ryan mentioned that at the last meeting they received an update on the Sharp Avenue Permeable Pavement pilot project that was five years ago. It was a study into whether it worked, how much it cost, and whether it filtered water. They will also be presenting the study results to the Department of Ecology. It compared regular asphalt, permeable asphalt, and permeable concrete all interspersed along various blocks of Sharp Avenue. Her takeaway was that it could be a viable solution if you could not put a swale in.
  - They also went over the TBD (Transportation Benefit District) residential projects. Each Transportation Commissioner are going to work on surveying those projects by district and rating them to give helpful feedback.
  - They also presented the 2025 adaptive projects, the ones that are going to use non-permanent structures (i.e. bump outs, armadillos, candle separators, concrete separators). There are trials of these various types throughout the city.
  - There are some updates to the Bicycle Master Plan that may require an emergency amendment because they are not doing a Comprehensive Plan Update this year to get some projects on the books.
  - Finally, there was a presentation regarding Right-of-Way Vacation and the process for someone wanting to vacate a street. It is on a case-by-case basis.
- **City Council Liaison Report - Kitty Klitzke (Absent)**
  - No report as CM Klitzke was absent.



- **Community Assembly Liaison Report - Mary Winkes**
  - Mary had no report as there was not a CA meeting since the last PC meeting.
- **Secretary Report - Tirrell Black in lieu of Spencer Gardner**
  - Tirrell stated that Spencer is here and will be speaking to a couple of workshop items and will be asking for those to be considered to go to hearings. He needs to leave early hence she is stepping in as secretary today.
  - Tirrell also noted that as far as PlanSpokane 2046 goes there will be a climate planning presentation today and the chapter review, so they are continuing to work on that big project.
  - City Council passed the interim zoning ordinance allowing commercial uses in a PUD (Planned Unit Development). Per Greg's request, Spencer elaborated and clarified some items regarding this ordinance.
  - We have one job posted in our department on the city's website for a principal planner to help fill that vacancy.

**Current Agenda:** The current agenda was approved unanimously.

**Workshop(s):**

- Climate Planning Phase 1 Wrap-Up
  - Presentation provided by staff member Maren Murphy.
  - Questions asked and answered.
  - Discussion ensued.
- Addressing Code Revisions, Request for Hearing: [SMC 17D.050A.040](#), [SMC 17D.050A.050](#), [SMC 17D.050A.100](#), [SMC 17D.050A.160](#)
  - Presentation provided by Planning Director Spencer Gardner.
  - Questions asked and answered.
  - Discussion ensued.
  - **Motion:** I [Commissioner Francis] move that we take this item [Addressing Code Revisions] to hearing. Seconded by Vice President Patterson. Passed unanimously, 8-0-0.
- Streets, Alleys, and Driveways Adjustments: [SMC 17A.020.030](#), [SMC 17A.020.040](#), [SMC 17A.020.120](#), [SMC 17A.020.160](#), [SMC 17G.010.130](#), [SMC 17H.010.015](#), [SMC 17H.010.090](#)
  - Presentation provided by Planning Director Spencer Gardner.
  - Questions asked and answered.
  - Discussion ensued.
  - **Motion:** I [Commissioner Francis] move that we advance this [Streets, Alleys, and Driveways Adjustments] to hearing. Seconded by Vice President Patterson. Passed unanimously, 8-0-0.
- PlanSpokane 2046: Chapter Review Update
  - Presentation provided by staff member Kevin Freibott.
  - Questions asked and answered.
  - Discussion ensued.

Workshops Adjourned at 3:48 PM.

The next regularly scheduled Plan Commission meeting is scheduled for Wednesday, July 9, 2025.

July 1, 2025

President Bank and Plan Commissioners  
City of Spokane

**Re: July 9 Second Workshop on the Excelsior Wellness Development Agreement**

Dear President Bank and Plan Commissioners,

On April 23, 2025, I provided a refresher on the Excelsior Wellness Development Agreement we are developing as a condition on their approved 2024 Comprehensive Plan Amendment. The Development Agreement concerns approximately 32 acres in the Balboa/South Indian Trail neighborhood, immediately north of W Indian Trail Road. This property was the subject of a 2024 Comprehensive Plan Amendment, which was approved with the condition that they execute a Development Agreement.

During the past few months, we have completed a combined Agency Comment Period and Public Comment period regarding possible terms for the Development Agreement (see attached comment letters). I have also had several coordinating meetings with the applicant, negotiating various terms and requirements that would be in the agreement and outlining the information and deliverables the applicant would be required to submit for approval before they can apply for future development permits.

On July 9 we will hold a second workshop with the Plan Commission, during which I will go through (in general) each of the possible requirements in the draft agreement. We hope to answer any questions you may have at that time and to garner any additional language you feel might be warranted in this agreement. The applicant will also be on hand to answer questions during the workshop.

Our hope is that at the completion of this workshop you will feel comfortable authorizing a future hearing on this item. We would then complete our documentation and staff report and forward all to you prior to the hearing for your consideration of the salient details.

In the meantime, you might wish to refamiliarize yourself with the project by reviewing the Comprehensive Plan Amendment project page here:

<https://my.spokanecity.org/projects/2023-2024-proposed-comprehensive-plan-amendments/indian-trail/>

The final Ordinance approving the Comprehensive Plan Amendment, along with conditions requiring the execution of a Development Agreement, can be found at the following link:

<https://static.spokanecity.org/documents/projects/indian-trail-comprehensive-plan-amendment/ord-c36613-z23-479comp-indian-trail.pdf>

During the workshop, I will go through the possible requirements of the Development Agreement in depth. For your consideration, the major points currently include:

1. Prior to any building permits, the applicant will provide for City approval a site plan or configuration that gives details as to where certain uses might be located on the site and the circulation within it for both vehicles and people.
2. Prior to any building permits, the applicant will provide development potential in the form of a maximum number of residential units by type and the maximum square footage of non-residential uses to be installed on site, so that the City may determine and mitigate any service or utility impacts, including traffic impact to North Indian Trail.
3. Per comments from the WA Department of Archaeology and Historic Preservation, a cultural resources survey will be required in undisturbed areas prior to ground-disturbing activities like grading or construction.
4. Some primary uses normally allowed in Community Business zones will be prohibited on site (e.g. Mini-Storage, High Impact Uses, Manufacturing & Production, etc.).

Ultimately, this item will go forward (with your agreement) for a Hearing with the Plan Commission, after which the City Council will likewise hold a hearing before approving the final Development Agreement.

We look forward to seeing everyone next week during the workshop and answering any questions you may have. You and the public are encouraged to send any comments or questions to me directly at the email below. Thank you!

Sincerely,



Kevin Freibott, Senior Planner  
Planning & Economic Development  
[kfreibott@spokanecity.org](mailto:kfreibott@spokanecity.org)  
509-625-6184



File 25-004COMP

**Development Agreement for Excelsior Wellness (Proposed)**


Agency Comments Received to Date

**From:** [MacNaughton, James \(DAHP\)](#)  
**To:** [Freibott, Kevin](#)  
**Subject:** RE: Request for Comments - Excelsior Wellness Development Agreement  
**Date:** Wednesday, June 4, 2025 7:19:53 AM  
**Attachments:** [image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image008.png](#)  
[2017-01 CRS for Excelsior Youth Center Project.pdf](#)

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

Of course! My apologies for not thinking of that!

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

**From:**  
Freibott,  
Kevin

<kfreibott@spokanecity.org>

**Sent:** Tuesday, June 3, 2025 1:14 PM

**To:** MacNaughton, James (DAHP) <james.macnaughton@dahp.wa.gov>; Macrae, James (DAHP) <James.Macrae@dahp.wa.gov>; Tasa, Guy (DAHP) <Guy.Tasa@DAHP.WA.GOV>

**Cc:** Randy Abrahamson <randya@spokanetribe.com>; Guy Moura <guy.moura@colvilletribes.com>; jill.wagner@cdatribe-nsn.gov

**Subject:** RE: Request for Comments - Excelsior Wellness Development Agreement

External Email

Thank you, James. Could you possibly provide me with a copy of the 2017 CRS for my files? Thanks.

Kevin



**Kevin Freibott, MA ORGL** | Senior Planner | City of Spokane - Planning and Economic

Development

509.625-6184 | <mailto:kfreibott@spokanecity.org> | [spokanecity.org](http://spokanecity.org) | [spokaneplanning.org](http://spokaneplanning.org)



**Please note that my work schedule is currently 6:30 AM – 5:30 PM, Monday through Thursday**

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**From:** MacNaughton, James (DAHP) <[james.macnaughton@dahp.wa.gov](mailto:james.macnaughton@dahp.wa.gov)>

**Sent:** Tuesday, June 3, 2025 12:27 PM

**To:** Freibott, Kevin <[kfreibott@spokanecity.org](mailto:kfreibott@spokanecity.org)>; Macrae, James (DAHP) <[James.Macrae@dahp.wa.gov](mailto:James.Macrae@dahp.wa.gov)>; Tasa, Guy (DAHP) <[Guy.Tasa@DAHP.WA.GOV](mailto:Guy.Tasa@DAHP.WA.GOV)>

**Cc:** Randy Abrahamson <[randya@spokanetribe.com](mailto:randya@spokanetribe.com)>; Guy Moura <[guy.moura@colvilletribes.com](mailto:guy.moura@colvilletribes.com)>; [jill.wagner@cdatribe-nsn.gov](mailto:jill.wagner@cdatribe-nsn.gov)

**Subject:** RE: Request for Comments - Excelsior Wellness Development Agreement

[CAUTION - EXTERNAL EMAIL - Verify Sender]


Good Morning Kevin

Thank you for reaching out to DAHP about this project. In researching the 2017 project it was discovered there was a human burial on the boundary of the Area of Impact. Therefore I am including our permitting specialist Assistant State Archaeologist James MacRae, and State Physical Anthropologist Guy Tasa in order to ensure we are covering all aspects of avoidance and mitigation.

As for the project area outside the 2017 survey, we are requesting a Cultural Resources Survey with testing for that outlying part of the Area of Impact.

Please let me know if you have any questions.

James

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

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**From:**  
Freibott,  
Kevin

<[kfreibott@spokanecity.org](mailto:kfreibott@spokanecity.org)>

**Sent:** Monday, May 19, 2025 1:36 PM

**Cc:** McCall, Angie <[amccall@spokanecity.org](mailto:amccall@spokanecity.org)>; King, Emily <[eking@spokanecity.org](mailto:eking@spokanecity.org)>

**Subject:** Request for Comments - Excelsior Wellness Development Agreement

External Email

Please see the attached request for Comments regarding a Development Agreement, a condition of approval for a Comprehensive Plan Amendment on W Indian Trail. Comments are appreciated by June 4, 2025. Thanks!

Kevin



**Kevin Freibott, MA ORGL** | Senior Planner | City of Spokane - Planning and Economic Development

509.625-6184 | <mailto:kfreibott@spokanecity.org> | [spokanecity.org](http://spokanecity.org) | [spokaneplanning.org](http://spokaneplanning.org)



**Please note that my work schedule is currently 6:30 AM – 5:30 PM, Monday through Thursday**

**From:** [Kokot, Dave](#)  
**To:** [Freibott, Kevin](#)  
**Subject:** RE: Request for Comments - Excelsior Wellness Development Agreement  
**Date:** Tuesday, June 3, 2025 6:54:05 AM  
**Attachments:** [image003.png](#)  
[image005.png](#)

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Fire has no comments.

**David F. Kokot, P.E.** | Spokane Fire Department | Fire Protection Engineer  
509.625-7056 | fax 509.625.7006 | [dkokot@spokanefire.org](mailto:dkokot@spokanefire.org) | [spokanefire.org](http://spokanefire.org)



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

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**From:** Freibott, Kevin <[kfreibott@spokanecity.org](mailto:kfreibott@spokanecity.org)>  
**Sent:** Monday, May 19, 2025 1:36 PM  
**Cc:** McCall, Angie <[amccall@spokanecity.org](mailto:amccall@spokanecity.org)>; King, Emily <[eking@spokanecity.org](mailto:eking@spokanecity.org)>  
**Subject:** Request for Comments - Excelsior Wellness Development Agreement

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Kevin



**Kevin Freibott, MA ORGL** | Senior Planner | City of Spokane - Planning and Economic Development

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## Agency Comments - Excelsior Wellness, p. 5

Please note: Conversations have continued with the Water Department and Integrated Capital Management on these issues and the situation has evolved since this letter was written. A summary of those conversations will be included in the staff report.

From: Fredrickson, Beryl  
To: Freibott, Kevin  
Cc: McCall, Angie; King, Emily; Davis, Marcia; Patch, Mark  
Subject: RE: Request for Comments - Excelsior Wellness Development Agreement  
Date: Tuesday, May 20, 2025 9:18:36 AM  
Attachments: inxae002.png  
Draft Conditional Language for Applicant\_25-004COMP KF 20250508.pdf  
inxae004.png

Kevin,

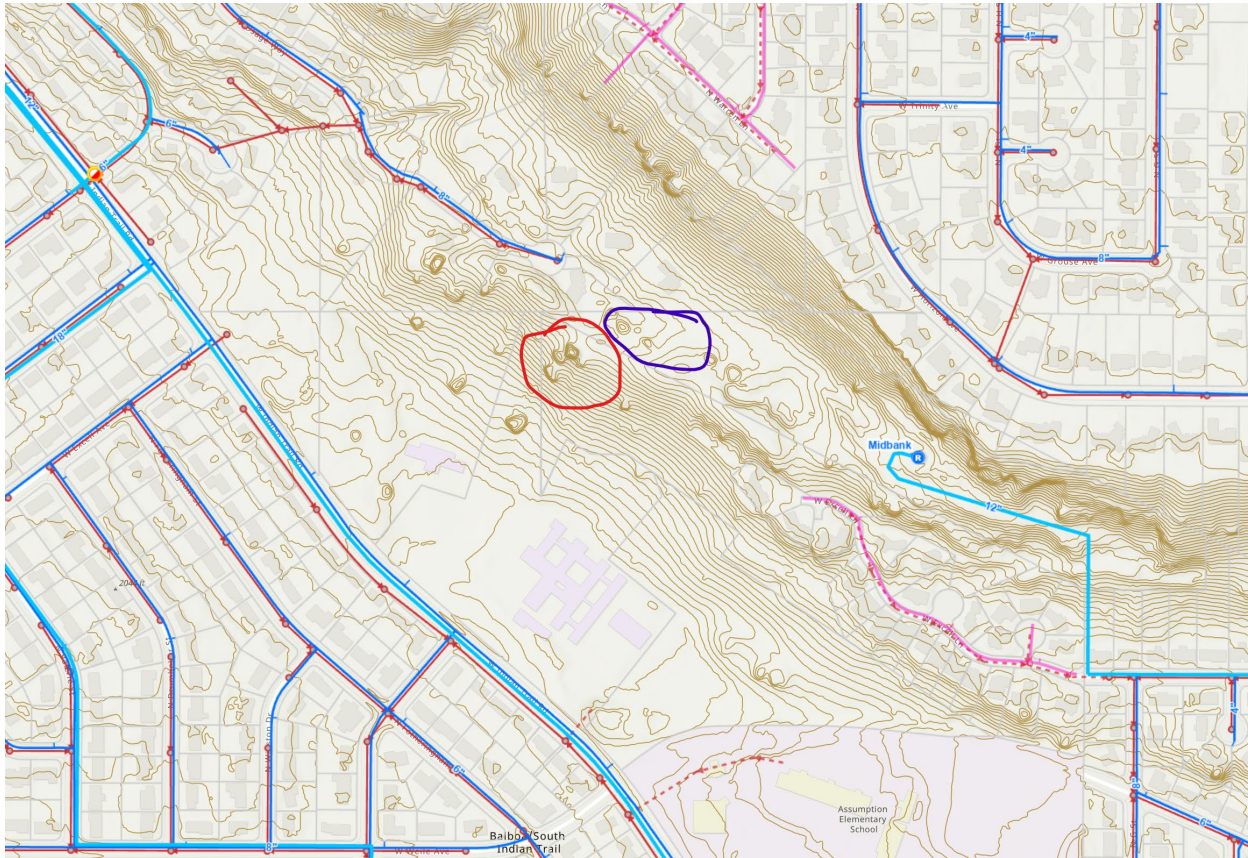
Thanks for sending over the draft language. The draft conditional language letter includes requests for clear documentation on transportation details and design with a trip generation letter. The letter should also include language requiring sewer and water utility locations and more specifically connection points to the existing utilities. It should include language for with a water and sewage demand estimates. The commercial area will allow manufacturing which those types of demands are more difficult to estimate. I would assume that it is unlikely that manufacturing would be located in this area, but it must be accounted in the estimates. The current language will help ICM in estimating sewage and water demands for the area. There are several 8-inch sewer lines, that may be undersized, that this development area will connect to.

Brainstorming here: We are also looking for a location for North Hill pressure zone tank. This project is in the 6year capital program, but an official site has not been selected. The tank should be located at an elevation around 2160 feet (see red circle) and near Indian Trail Road. This elevation is located in property 26261.3401 which is not within this development area boundaries. The city has not reached out to the owner of property 26261.3401. The city owns the purple circled property which could also be a good location for a tank. This location has not been fully vetted. It is rocky and heavily treed. We may want to add language for a transmission main with maintenance access to be located within the development area to the City's property.

Marcia, Mark and Kevin,

What do you think about this addition to the text in the letter?:

*Developer shall provide a full build out projected water and sewer study by a licensed engineer that shows average and peaking daily and hourly demands and required fire flow for the Project area. Specify where the sewer and water connections to the existing system are expected. This information is required to maximize development approval while tracking total existing system demands and future development planned system demands. Possible solutions to reduce water demands include adding fire sprinklers to all proposed buildings and reducing outdoor irrigation needs by using xeriscaping or "Spokanescape" type landscapes. This provides a reduction in water use and the additional benefit of lower maintenance saving both time and money. This development area is located near a possible future water tank site. The City may require a water main easement through the property and maintenance truck access to the east of the development area.*



Thanks,

B

**Beryl Fredrickson, PE** | Senior Engineer  
Integrated Capital Management | Washington Water Utility Council Chair

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

From: Freibott, Kevin <kfreibott@spokanecity.org>  
Sent: Tuesday, May 20, 2025 7:30 AM  
To: Fredrickson, Beryl <bfredrickson@spokanecity.org>  
Cc: McCall, Angie <amccall@spokanecity.org>; King, Emily <eking@spokanecity.org>  
Subject: RE: Request for Comments - Excelsior Wellness Development Agreement

Hi, B. The DA will require that they furnish that information as well as a site plan for City approval before they can get building permits. Essentially, they don't know for sure what they want to do here and are trying to build in some flexibility. Naturally, we're trying to get some certainty.

I send you the current draft of the language if that would help. It's drafty draft at this point (see attached).

Kevin



**Kevin Freibott, MA ORGL** | Senior Planner | City of Spokane - Planning and Economic Development  
509.625-6184 | <mailto:kfreibott@spokanecity.org> | [spokanecity.org](http://spokanecity.org) | [spokaneplanning.org](http://spokaneplanning.org)



**Please note that my work schedule is currently 6:30 AM – 5:30 PM, Monday through Thursday**

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**From:** Fredrickson, Beryl <[bfredrickson@spokanecity.org](mailto:bfredrickson@spokanecity.org)>

**Sent:** Monday, May 19, 2025 6:54 PM

**To:** Freibott, Kevin <[kfreibott@spokanecity.org](mailto:kfreibott@spokanecity.org)>

**Cc:** McCall, Angie <[amccall@spokanecity.org](mailto:amccall@spokanecity.org)>; King, Emily <[eking@spokanecity.org](mailto:eking@spokanecity.org)>

**Subject:** RE: Request for Comments - Excelsior Wellness Development Agreement

Hi Kevin,

Could you provide an estimated of a full build out unit count for the moderate residential areas for this agreement?

Thanks,

B

**Beryl Fredrickson, PE** | Senior Engineer  
Integrated Capital Management | Washington Water Utility Council Chair

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

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**From:** Freibott, Kevin <[kfreibott@spokanecity.org](mailto:kfreibott@spokanecity.org)>

**Sent:** Monday, May 19, 2025 1:36 PM

**Cc:** McCall, Angie <[amccall@spokanecity.org](mailto:amccall@spokanecity.org)>; King, Emily <[eking@spokanecity.org](mailto:eking@spokanecity.org)>

**Subject:** Request for Comments - Excelsior Wellness Development Agreement

Please see the attached request for Comments regarding a Development Agreement, a condition of approval for a Comprehensive Plan Amendment on W Indian Trail. Comments are appreciated by June 4, 2025. Thanks!

Kevin



**Kevin Freibott, MA ORGL** | Senior Planner | City of Spokane - Planning and Economic Development  
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File 25-004COMP

**Development Agreement for Excelsior Wellness (Proposed)**

Public Comments Received to Date

**From:** [Leute Norberto](#)  
**To:** [Freibott, Kevin](#)  
**Subject:** Re: Request for Comments: Development Agreement for Excelsior Wellness  
**Date:** Monday, May 19, 2025 3:45:14 PM  
**Attachments:** [image002.png](#)

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

How is traffic congestion going to be handled? There is a very spotty history of poor traffic planning. How is the parking going to be addressed for residential areas? How are future developers going to build fireproof buildings and houses? We are at significant risk of fires; this is the time to start addressing these issues. Just remember the residential area didn't burn down by fire, but by wind, which brought in embers.

On Mon, May 19, 2025 at 1:37 PM Freibott, Kevin <[kfreibott@spokanecity.org](mailto:kfreibott@spokanecity.org)> wrote:

Good afternoon! You are receiving this email because you commented on last year's Indian Trail Comprehensive Plan Amendment. As you may remember, the City Council approved the comprehensive plan amendment but required the applicant (Excelsior Wellness) to sign a development agreement with the City. The time has come to prepare and adopt that development agreement. I've included the pertinent details in the attached letter. Please take a look and contact me with any questions or comments. Thanks again for your participation in this process—I look forward to hearing from you.

Sincerely,

Kevin Freibott



**Kevin Freibott, MA ORGL** | Senior Planner | City of Spokane - Planning and Economic Development

509.625-6184 | <mailto:kfreibott@spokanecity.org> | [spokanecity.org](http://spokanecity.org) | [spokaneplanning.org](http://spokaneplanning.org)



**Please note that my work schedule is currently 6:30 AM – 5:30 PM, Monday through Thursday**

**From:** [K M](#)  
**To:** [Freibott, Kevin](#)  
**Subject:** Re: Request for Comments: Development Agreement for Excelsior Wellness  
**Date:** Sunday, June 8, 2025 7:33:23 PM  
**Attachments:** [image002.png](#)

---

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hi Kevin.

I can't get your attachment to open. Mind resending?

In short, this is our neighborhood. We already have a hard time crossing Indian Trail at Kathleen. Walking along said "highway" to get to the school crosswalk makes a fun walk a loud, scary experience especially with a dog and/or kids. Clearly increased traffic is undesirable. And Excelsior's plan to put in 5 story apartments with 365(?) units is way out of line for this location. It's hard to imagine half that many units on an already congested 4 lane highway.

And they also want commercial space? As a nonprofit, how would that work?? Do they seek financial gain from renting space out to businesses? What kind of businesses? Has anyone considered how hard it is to pull out and make a turn into the opposite lane now (try making a left turn from Yokes back onto Indian Trail).

I feel there is no regard for the actual limited space for a project of this scale in our neighborhood. 50 units limited to 2 stories max would seem more appropriate in every way.

I'll call tomorrow!

Thanks, Mary

P.S. Emergency evacuation would be a nightmare with a development of this size. On Saturday, there was a 1 acre fire nearby (8000 Blk North Pamela Street). It will happen again in our beautifully forested area. Imagine ~365 more cars trying to escape a forest fire using Indian Trail Road.

---

From: Freibott, Kevin <kfreibott@spokanecity.org>  
Sent: Monday, May 19, 2025 8:36 PM  
Subject: Request for Comments: Development Agreement for Excelsior Wellness

Good afternoon! You are receiving this email because you commented on last year's Indian Trail Comprehensive Plan Amendment. As you may remember, the City Council approved the comprehensive plan amendment but required the applicant (Excelsior Wellness) to sign a development agreement with the City. The time has come to prepare and adopt that development agreement. I've included the pertinent details in the attached letter. Please take a look and contact me with any questions or comments. Thanks again for your participation in this process—I look forward to hearing from you.

Sincerely,

Kevin Freibott

[City%20Logo\_2%20color\_tif]

Kevin Freibott, MA ORGL | Senior Planner | City of Spokane - Planning and Economic Development  
509.625-6184 | <mailto:kfreibott@spokanecity.org> | [spokanecity.org](http://www.spokanecity.org)<<http://www.spokanecity.org>> |  
[spokaneplanning.org](http://www.spokaneplanning.org)<<http://www.spokaneplanning.org>>

[A close-up of a logo Description automatically generated]<[planspokane.org](http://planspokane.org)>

Please note that my work schedule is currently 6:30 AM – 5:30 PM, Monday through Thursday

**From:** [Jim Davis](#)  
**To:** [Freibott, Kevin](#)  
**Cc:** [Bill Garry](#); [Gary Jablonski](#); [Ben Markham](#); [LeAnna Chauvin](#)  
**Subject:** Hillside Park Board of Trustees Comments on Development Agreement Z23-479COMP Excelsior Wellness  
**Date:** Tuesday, June 17, 2025 4:32:58 PM  
**Attachments:** [DevAgreementMap.pdf](#)

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

Good afternoon Kevin, hope you are well. Here are the subject comments.

Best Regards.

Jim

*We the undersigned are the Board Of Trustees of the Hillside Park Owner's Association, a Planned Unit Development that is North of and shares a boundary with the project area and the property owned by Excelsior Wellness. While we understand that the Comprehensive Plan Amendment and the land use and zoning changes requested in it have been approved, we feel it necessary to request some limitations and requirements to the development of the property to mitigate adverse affects to the quality of life and property values of our residents. The approval of a zoning change to Residential Moderate and General Commercial to this 32 acre parcel surrounded on all sides by property zoned Residential Low is going to have a significant adverse impact to the entire neighborhood, not just to our community. Accordingly, we make the following requests to be included in the Development Agreement.*

**Site Plan:**

*The developer and Excelsior Wellness have stated that they intend to construct as many as 300+ multifamily dwelling units and commercial structures on their 32 acre property, this will result in a significant increase in population density, noise, light pollution, impact to Hillside Park viewsheds, destruction of wildlife habitat, and increased risk of trespass on Hillside Park private property and common lands. We request that this project be reduced to no more than 200 multifamily dwelling units and commercial structures.*

*We also request that the location of the tallest multi-family housing units within the area zoned Residential Moderate be located in the western portion and as close to Indian Trail Road as possible. Location of structures of this size & height in this portion will mitigate the impact to Hillside Park residents as this portion of land abutting the Excelsior boundary is Hillside Park common land with no private residences on it. Should structures of this type be located on the eastern portion of the Excelsior property zoned Residential Moderate they will severely impact the property values of eight private lots that share a boundary with Excelsior. 55 foot high structures in this area will be directly in the viewshed of these eight residences on Excell Ln. The addresses of the these eight residences are: 3419, 3423, 3427, 3431, 3503, 3507, 3511, & 3515. These eight homes have no Association common land*



*buffer between them and Excelsior. 55 foot high structures in this location will result in blocked views, excessive noise, and light pollution for all eight residences. Accordingly, we request that multifamily structures in this area be limited to one story in height and set back as far as possible from the southern boundaries of these eight lots. (see attached map)*

*Because of the significant probability of increased trespass on Hillside Park common and private land we also request that Excelsior Wellness be required to construct a fence on the entire length of the common boundary our association shares with Excelsior Wellness. At the Hillside Park Owners Association Annual Meeting on Sunday, June 1, 2025, the following resolution was unanimously approved:*

***As a condition of approval of the subject development agreement, Excelsior Wellness shall construct a fence along the entire length of the shared boundary with the Hillside Park owners Association.***

*The fence is depicted by the heavy black line on the attached map.*

*Please direct any comments or questions to me at the number below or to Bill Garry on 907-854-2207.*

*Attachment*

*Respectfully.*

*Hillside Park Board of Trustees*

|                       |                        |
|-----------------------|------------------------|
| <i>Bill Garry</i>     | <i>President</i>       |
| <i>Jim Davis</i>      | <i>Vice President</i>  |
| <i>Ben Markham</i>    | <i>Secretary</i>       |
| <i>Gary Jablonski</i> | <i>Treasurer</i>       |
| <i>LeAnna Chauvin</i> | <i>Member at Large</i> |

**Jim Davis**  
**(520) 822-4592**

**From:** [Michele Mcclafflin](#)  
**To:** [Planning & Development Services Comp Plan; Freibott, Kevin](#)  
**Cc:** [William & Jeanine Garry; Jim Davis; Gary Jablonski; LeAnna Shauvin; Mack Cain; Klein Dan; Daniel Clark; Kim Bush; Curtis, Sondra; Bruce and Steffanie Ottmar \(HPHA\); John/Tara Smith; Theresa Stone; rashmi.dolly123@gmail.com; Gordon Aden; Matt Brannon; Culberson, Chris; Debra Hill; Ryan Kee; Kathryn Kuhn; Tong & Chen Liu; Ticia Brannon; bmarkham3@aol.com](#)  
**Subject:** Excelsior expansion concerns  
**Date:** Monday, June 23, 2025 5:07:30 PM  
**Importance:** High

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

June 20, 2025

Dear City Council and Planning Department;

I have previously written two letters to the Planning Department in regard to this issue. My prior emails were dated: 7/23/2024 and 10/07/2024.

I am writing to oppose the proposed development in it's current plan of the approximate 300+ multi-family homes and expanded facilities behind our HOA neighborhood and ask you for some alternate considerations.

This project would destroy vital wildlife habitat, endangering local species such as deer, marmots, wild rabbit, raccoons, porcupines, cougars, coyotes, and the occasional moose and bear. It would also include the destruction of habitat for all the owls and all the various birds and hummingbirds (which we currently have nested in a tree). The removal of trees and natural areas will have a permanent negative impact on our local environment.

Additionally, Indian Trail is already severely congested and lacks traffic lights at Woodside and Indian Trail. Woodside Avenue use to be just a very local residential street. Unfortunately, with all the more recently approved apartments and homes that have been built over the last 5 years along the north Indian Trail corridor Woodside Avenue is now practically major thoroughfare. If Excelsior adds hundreds of new housing units it will significantly worsen traffic, increase safety risks, and strain existing infrastructure. At a minimum, a traffic light at Indian Trail and Woodside would be necessary.

I \*urge\* the city to require a comprehensive environmental impact assessment and to consider alternative designs that preserve wildlife habitat and green space and to address these traffic concerns. Protecting our neighborhood's character and the local ecosystem should be a top priority.

At a minimum, please consider limiting the number of multi-family homes to less than 200 and hopefully curb/limit the request for expanded facilities. Also, a 6 to 8 foot tall fence between our Hillside Park HOA community and the Excelsior facilities/housing would help prevent the continual issues of trespassers (it has been mostly teenagers/young adults) over the last 25 years!!

To conclude these are some other concerns:

Increased traffic congestion will worsen safety and quality of life as more congestion will lead to a higher risk of accidents, especially rear-end collisions and pedestrian injuries. It is a fact that stop-and-go traffic increases driver frustration and increases risky behaviors like speeding and inattentiveness.

Poor air quality disproportionately affects vulnerable groups, including children, the elderly, and those with preexisting health conditions. Slow-moving traffic increases



air pollution, which is linked to higher rates of respiratory issues, excess morbidity, and even premature deaths for people living near congested roads.

Traffic noise, vibrations from vehicles, and pollution degrades neighborhood peace and lowers property values.

Increased traffic congestion results in unpredictable and longer travel times, causing stress, missed appointments.

The overall convenience, safety, and character of the neighborhood will be diminished, making it less desirable for current and future residents. Increased traffic congestion will make our neighborhoods less safe, less healthy, and less enjoyable to live in.

Please look at this as if this was YOUR home, YOUR investment, YOUR family, YOUR life. We care about our community and our neighbors. I would hope that you would try to consider this from this point of view.

Thank you for your consideration.

Kindest regards,

Michele Taylor McClafin

3503 W Excell Ln

Spokane, WA 99208

509-990-9915

July 1, 2025

Spokane Plan Commission  
City of Spokane

**Re: July 9 Discussion of Housing Need by Income Bracket**

Dear President Bank and Plan Commissioners,

It is my pleasure to provide the attached report for your consideration, Accommodating Affordable Housing in the City of Spokane. This report represents a key step in the process of updating the Comprehensive Plan ([PlanSpokane 2046](#)). The analysis and findings meet the requirements of the Growth Management Act and House Bill 1220 (2021), which call on the City to analyze its ability to accommodate needed housing in various income brackets for the next 20 years.

As you may recall from our discussion of the Land Capacity Analysis on February 26, 2025, all jurisdictions within Spokane County have completed a lengthy collaborative process to determine the needed housing in the County, separated into several affordability brackets. This process apportioned the need to each jurisdiction, the City of Spokane included, based upon their projected growth over the next twenty years.

Following the regional process, our department completed a full review of the City's current zoning and development capacity and compared that to the required number of units in each income bracket. The attached report outlines the results of that analysis, which I will present at your next meeting to give you an overview of both process and results.

A few things to note:

1. The process the City undertook followed the published guidance from the WA Department of Commerce as closely as possible.
2. While House Bill 1220 also requires Cities to quantify the number of emergency housing beds they can accommodate, analysis of emergency housing is still underway. The results of this *additional* analysis will be presented to you at a later date.
3. The ultimate intent of this report is to inform strategies for future development in the city via the Periodic Update to the Comprehensive Plan (PlanSpokane 2046) and its Environmental Impact Statement.

Please review the report prior to the July 9 meeting, during which I will be on hand to give a brief overview of the process and analysis and to answer any questions or concerns you may have.

I look forward to seeing you all at the next meeting. Thanks, and have a great day.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Freibott", with a stylized flourish at the end.

Kevin Freibott, Senior Planner  
Planning & Economic Development  
[kfreibott@spokanecity.org](mailto:kfreibott@spokanecity.org)  
509-625-6184



# **Accommodating Affordable Housing**

**in the City of Spokane, Washington**

*a requirement of the Growth Management Act (RCW 36.70A.70)*

**June, 2025**



**PLAN****SPOKANE**

Resilient | Connected | Livable | 2046



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## Executive Summary

The State of Washington has adopted new legislation that requires communities like Spokane to ensure they can accommodate needed housing in various affordability brackets when updating their Comprehensive Plans. As the City of Spokane is undertaking the next mandated Periodic Update to its Comprehensive Plan, the City must consider growth for the next twenty years. Sufficient capacity must exist in the City to accommodate housing development in these brackets.

The City has analyzed its housing unit capacity already as part of the adopted Land Capacity Analysis (LCA) for the City of Spokane. This report expands upon the findings of the LCA in order to differentiate the available land capacity by affordability bracket.

Affordability in Spokane is established by a percentage of the Area Median Income (AMI), set by the U.S. Department of Housing and Urban Development. Currently, the City of Spokane exhibits a median three-person family income of \$90,720 per year, through which the City can determine the various affordability brackets as follows:

- 0-80% AMI = \$0 and \$72,600
- 80-120% AMI = \$72,601 and \$108,864
- 120+% AMI = more than \$108,864

To determine where in the City units might be affordable for these incomes, the analysis used publicly available commercial price data from Zillow.com, Redfin.com, Rentcafe.com, and Apartments.com. Tenure information from the American Communities Survey (ACS) was then used to determine what proportion of units in a given part of the city might be rented or owned. By comparing the unit capacity in the LCA against the affordability information from the web-based sources *and* the tenure (rent vs. own) data from the ACS, the City has determined which units of capacity in the LCA are expected to fall within one of the three affordability brackets.

By applying the analysis outlined in this report, the City determined that even though there currently exists sufficient land capacity for 33,000+ units, the City cannot likely accommodate the needed units in the most affordable category, 0-80% AMI. The specific number of units in each category the City *can* accommodate is shown in **Figure 1** below.

Per the Washington Department of Commerce guidance on the subject, the City must now contemplate certain amendments to development strategies, code requirements, and policy towards raising the number of 0-80%AMI units the City can accommodate in the next twenty years. What those amendments might be will be a topic of the upcoming Environmental Impact Statement and Comprehensive Plan Periodic Update.

**Figure 1: Final Results–City of Spokane Housing Unit Capacity by Affordability**

|                                 | 0-80%AMI Units | 80-120%AMI Units | 120+%AMI Units |
|---------------------------------|----------------|------------------|----------------|
| New Units Needed (2020-2046)    | 15,347         | 2,588            | 4,424          |
| Units Already Built (2020-2025) | 1,328          | 507              | 978            |
| Remaining Capacity              | 9,654          | 8,036            | 12,475         |
| <b>RESULTS</b>                  | <b>-4,365</b>  | <b>5,955</b>     | <b>9,029</b>   |

**Source:** New Units Needed = Department of Commerce Housing Allocation Planning Tool (HAPT). Units Already Built: City of Spokane, Acella Data 2021 to 2024. Remaining Capacity = Land Capacity Analysis for the City of Spokane, 2025.

**Notes:** RESULTS row represents the following calculation: (Units Already Built + Remaining Capacity) - New Units Needed. A negative number denotes a lack of sufficient capacity in that affordability bracket to accommodate the need identified by the State.



## **I. Introduction**

In 2021 the Washington State Legislature passed new legislation seeking to remedy the State's ongoing housing crisis. Described as a bill “supporting emergency shelters and housing through local planning and development regulations,” House Bill 1220 (HB1220) was passed on April 14, 2021. Among other changes, HB1220 expanded the requirement for Cities and Counties planning under the Growth Management Act (GMA) to plan for and accommodate housing within their borders when conducting major updates to their comprehensive plan.

Prior to HB1220, Cities and Counties were only required to quantify and accommodate their total 20-year housing unit need. HB1220 expanded that requirement, calling on jurisdictions to consider and plan for housing units broken down by various affordability brackets, based on Area Median Income (AMI). Accordingly, the Washington Department of Commerce (Commerce) provided the Housing Allocation Planning Tool (HAPT) and various guidance documents to help jurisdictions meet the new requirements.

The following analysis conforms largely to the guidance provided by Commerce, primarily Commerce publications [Establishing Housing Targets for your Community \(Book 1\)](#) and [Guidance for Updating your Housing Element \(Book 2\)](#). While HB1220 also included the requirement that the City consider racially disparate impacts and displacement, those topics will be addressed in a separate study underway by the City of Spokane and are not explored in detail here. Additionally, HB1220 requires that City quantify their ability to accommodate emergency housing—a topic which will be addressed in a separate report from this one.

## **II. Report Preparation**

The following report was prepared by the Planning & Economic Development department at the City of Spokane, utilizing the following staff:

Project Manager & Chief Analyst: Kevin Freibott, Senior Planner

Planning Director: Spencer Gardner, AICP

Deputy Planning Director: Tirrell Black, AICP

Economic Development: Amanda Beck, Planner II

This report is a follow-up to the City's Land Capacity Analysis (LCA), adopted earlier in 2025. Readers are referred to that document for greater detail as to the available lands within the City and the development potential therein.

### III. Defined Terms

Prior to discussing the housing allocation and the City's capacity to accommodate those units, it's important to understand several key terms used by Commerce, the HAPT, and mentioned in GMA and HB1220. Those terms are as follows:

**Area Median Income (AMI):** The HAPT describes housing affordability by AMI, specifically as a percentage of the Spokane County AMI. AMI is established by the United States Department of Housing and Urban Development (HUD) and is updated annually for the use of housing providers and local government. HUD sets the AMI for the entire Spokane metropolitan area, not for cities specifically. For financial year 2025, HUD states the AMI for the Spokane area is \$100,800. Commensurately, a household making \$100,800 annually in Spokane would be a 100%AMI household. Conversely, a household with an annual income of \$50,400 would be in the 50%AMI bracket.

**Permanent Housing:** Permanent housing units provide permanent residence, whether or not those units are provided along with supporting services. A housing unit can be any type of unit, be it a standalone house, apartment, condo, middle housing, or some other type of housing. For the purposes of this analysis, group housing is not considered as part of the permanent housing number, commensurate with HB1220 requirements.

**Permanently Supportive Housing (PSH):** PSH units are subsidized housing units with no limit on the length of stay, prioritizing housing for people who require comprehensive support services to retain tenancy. Generally, PSH is paired with on-site or off-site voluntary services designed to support a person living with a complex and disabling behavioral health or physical health condition who either was experiencing homelessness or was at imminent risk of homelessness prior to moving into housing. Simplified, PSH provides both housing *and* support to help prevent those in PSH from entering or returning to homelessness. PSH is quantified in the HAPT by unit.

### IV. Housing Affordability Brackets

The analysis required by HB1220 and GMA calls for the City to quantify and account for new housing in several affordability ranges, or brackets, based on AMI. The brackets are based on AMI, set by HUD, and represent a range of household incomes in the extremely-low-, very-low-, low-, and moderate-income ranges. Also included are higher incomes greater than the AMI, such as 120% AMI, but legislation has fewer requirements for planning for these housing types.

By calculating income as a percentage of AMI, the range of household incomes in each bracket can be determined. This is complicated somewhat by the fact that AMI changes by household size, rising as the number of people in the household rises. While most agencies and jurisdictions rely on the 4-person number, Commerce allows for jurisdictions to make adjustments according to local average household size.

The following table (**Figure 2**) provides the current AMI brackets, based on the region's median family income of \$100,800. The table includes both the 3-person income limits and the 4-person income limits. While 4-person family limits are most often cited when discussing AMI, the current average household size in the City of Spokane is closer to 3-persons<sup>1</sup>. Per Commerce Guidance, when this is true the jurisdiction can consider home affordability by using the 3-person limit instead<sup>2</sup>. Accordingly, the analysis in this report will do so.

**Figure 2: Income Brackets in Spokane County (2025)**

| Affordability Bracket | %AMI         | 3-Person Family<br>Income Range (Annual) | 4-Person Family<br>Income Range (Annual) |
|-----------------------|--------------|--|--|
| Extremely Low Income  | 0-30% AMI    | \$0 - \$27,250                           | \$0 - \$30,240                           |
| Very Low-Income       | 30-50% AMI   | \$27,251 - \$45,400                      | \$30,241 - \$50,400                      |
| Low Income            | 50-80% AMI   | \$45,401 - \$72,600                      | \$50,401 - \$80,640                      |
| Moderate Income       | 80-100% AMI  | \$72,601 - \$90,720                      | \$80,641 - \$100,800                     |
| High Income           | 100-120% AMI | \$90,721 - \$108,864                     | \$100,801 - \$120,960                    |
| Highest Income        | 120% + AMI   | \$108,865 and up                         | \$120,961 and up                         |

*Source: 2025 Income Limits Documentation System, United State Housing and Urban Development Department (HUD). Retrieved online at [www.huduser.gov](http://www.huduser.gov).*

*Notes: Calculations of income range, maximum annual housing cost, and maximum monthly housing cost made by City staff from HUD income limits.*

The Commerce guidance directs Jurisdictions towards assuming that a household should expect 30 percent of its income to go towards housing costs. Incidentally, this is the threshold for “cost burdened” households used by the State and most local jurisdictions. Those households that pay more than 30 percent of their monthly income towards housing costs are considered “cost burdened.”

In order to analyze the relationship between rents in the City of Spokane and the income brackets offered by AMI, first the appropriate maximum monthly housing cost for each bracket must be calculated. Converting annual income to determine what comprises 30 percent of the monthly income requires a simple calculation:

$$\text{Maximum Monthly Housing Cost} = \text{Annual Income} / 12 * 0.30$$

However, an additional calculation must be made because housing cost, when considered by Commerce and the state, includes monthly utility costs in addition to rent or mortgage payments. The amount to subtract from housing cost for utilities is informed on a county by county basis by local housing authorities. In the case of Spokane County, the Spokane Housing Authority publishes worksheets for the allowances for certain household utilities. Spokane Housing Authority's most current utility allowances are provided by housing type and the utilities involved (e.g. whether they be gas or electric, forced air or furnace). By using the most common utility types in Spokane, the following utility allowances can be assumed (see **Figure 3**).

Accordingly, the amounts in **Figure 3** should be incorporated into the maximum monthly housing cost calculation by subtracting them from the total. For the purposes

<sup>1</sup> 2.35 according to the US Census American Communities Survey, 2023 5-year Average.

<sup>2</sup> See p. 35 of *Guidance for Updating Your Housing Element* by the Department of Commerce, August, 2023.

**Figure 3: Utility Allowances by Unit Type and Number of Bedrooms, Spokane County**

| Unit Type                        | 0 Bedroom    | 1 Bedroom    | 2 Bedroom    | 3 Bedroom    | 4 Bedroom    | 5 Bedroom    |
|----------------------------------|--------------|--------------|--------------|--------------|--------------|--------------|
| High-Rise/Apartment              | \$206        | \$213        | \$227        | \$243        | \$259        | \$282        |
| Middle Housing & Low Rise        | \$216        | \$224        | \$243        | \$263        | \$282        | \$300        |
| Single-Unit, Duplex, Mobile Home | \$232        | \$244        | \$263        | \$283        | \$304        | \$323        |
| <b>AVERAGE VALUE</b>             | <b>\$218</b> | <b>\$227</b> | <b>\$244</b> | <b>\$263</b> | <b>\$282</b> | <b>\$302</b> |

*Source: Spokane Housing Authority, February 2025.*

*Notes: Assumes electric heating, electric cooking, and electric water heating, indicated by the source as the most common condition. The average value is a calculated value of the average of the values in the three unit types. It is not provided by Spokane Housing Authority.*

of this analysis, and consistent with the overall assumption of 3 persons per unit, this analysis will apply 2 bedroom average value of \$244. This results in the following calculation for maximum monthly rent or mortgage payment:

$$\text{Maximum Monthly Housing Cost} = \text{Annual Income} / 12 * 0.30 - \$244$$

By applying this formula, the maximum monthly housing cost for each affordability bracket result can be determined, as shown in **Figure 4** below. Note that the analysis in this report will utilize the three-person household data as discussed previously.

**Figure 4: Rent/Mortgage Payment Limits in Spokane County**

| AMI Bracket | Persons Per Household |         |         |         |         |         |
|-------------|-----------------------|---------|---------|---------|---------|---------|
|             | One                   | Two     | Three   | Four    | Five    | Six     |
| 30% AMI     | \$312                 | \$378   | \$437   | \$559   | \$678   | \$797   |
| 50% AMI     | \$665                 | \$782   | \$891   | \$1,016 | \$1,098 | \$1,181 |
| 80% AMI     | \$1,195               | \$1,387 | \$1,571 | \$1,772 | \$1,916 | \$2,058 |
| 100% AMI    | \$1,546               | \$1,789 | \$2,024 | \$2,276 | \$2,459 | \$2,642 |
| 120% AMI    | \$2,192               | \$2,477 | \$2,780 | \$3,003 | \$3,226 | \$3,448 |

*Source: Calculated values based on method in text.*

*Notes: Assumes 30 percent of monthly income calculated from annual Area Median Income, minus utility allowances.*

## V. The Housing Allocation Planning Tool (HAPT)

Commerce has provided a complex set of tools for Counties and Jurisdictions to utilize when determining their housing unit growth allocation through the planning horizon. This tool, known as HAPT, provides the countywide housing allocation based on the planning horizon and the County's overall population growth, as well as individualized jurisdiction housing growth based upon the share of the County's growth each jurisdiction expected to accommodate.

In the case of the Spokane County numbers, the County has adopted the middle housing forecast from OFM. This forecast is the most statistically supported option and provides for growth of 100,065 persons in the County by 2046. By using the regionally adopted projections, the entire county's allocation is provided (see **Figure 5** below).

**Figure 5: Countywide Housing Growth Allocation–Cities Included**

|                                | TOTAL         | Permanent Housing Needs by Income Level in Housing Units (as % of Area Median Income) |              |               |              |              |              |               |
|--------------------------------|---------------|---|--------------|---------------|--------------|--------------|--------------|---------------|
|                                |               | 0-30%AMI  |              | 30-50%AMI     | 50-80%AMI    | 80-100%AMI   | 100-120%AMI  | >120%AMI      |
|                                |               | Non-PSH   | PSH          |               |              |              |              |               |
| Current Estimated Housing      | 221,840       | 6,613   | 937          | 34,798        | 91,803       | 32,035       | 20,981       | 34,673        |
| New Housing by 2046            | 297,024       | 26,518  | 6,651        | 48,418        | 100,647      | 36,807       | 24,918       | 53,065        |
| <b>Additional Units Needed</b> | <b>75,184</b> | <b>19,905</b>   | <b>5,714</b> | <b>13,620</b> | <b>8,844</b> | <b>7,772</b> | <b>3,937</b> | <b>18,392</b> |

Source: Spokane County HAPT, January 2025.

Notes: AMI = Area Median Income, as set by the United State Housing and Urban Development Department (HUD). Current AMI is for FY2025.

Once countywide need is determined, HAPT divides up countywide growth by a number of possible methods. Spokane County and the Cities within it have chosen to use “Method C” in HAPT, as it provides for both a statistical division of the overall growth shown in **Figure 5**, but also accounts for housing need outside cities but within the Urban Growth Area (UGA). See **Appendix A** for more information on this method.

HAPT requires that Counties apportion housing need among the Cities as a percentage of regional housing growth each jurisdiction expects to accommodate. Ultimately, the region agreed on a method to convert projected population share into housing share, which was then input into HAPT (see **Appendix A**). Regarding the City of Spokane, while the city is expected to experience 23.34% of population growth, the City’s housing need represents 29.74% of the countywide housing growth. This is commensurate with recent development in Spokane that has exceeded 1,300 units annually since the recovery from COVID. By inputting 29.74 percent of countywide housing growth for the city into HAPT, the tool provides the following housing need in the city shown in **Figure 6** below.

**Figure 6: City of Spokane Housing Growth Allocation (2020 to 2046)**

|                                | TOTAL         | Permanent Housing Needs by Income Level (as % of Area Median Income) |              |              |              |              |              |              |
|--------------------------------|---------------|--|--------------|--------------|--------------|--------------|--------------|--------------|
|                                |               | 0-30%AMI   |              | 30-50%AMI    | 50-80%AMI    | 80-100%AMI   | 100-120%AMI  | >120%AMI     |
|                                |               | Non-PSH  | PSH          |              |              |              |              |              |
| Estimated Current Housing      | 99,938        | 3,534  | 937          | 19,479       | 47,090       | 11,873       | 7,118        | 9,907        |
| <b>Additional Units Needed</b> | <b>22,359</b> | <b>6,452</b>   | <b>1,851</b> | <b>4,413</b> | <b>2,631</b> | <b>1,418</b> | <b>1,170</b> | <b>4,424</b> |

Source: Spokane County HAPT, January 2025.

Notes: AMI = Area Median Income, as set by the United State Housing and Urban Development Department (HUD). Current AMI is for FY2025.

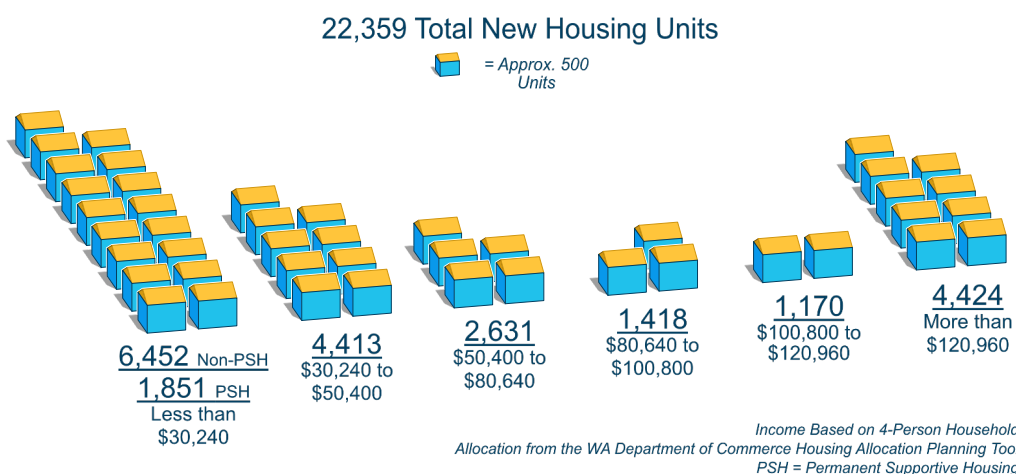
As shown above, the City is expected to require 22,359 additional permanent housing units between 2020 and 2046. While those units are spread among all the affordability brackets, that spread is not equal bracket to bracket. **Figure 7** on the following page provides a graphical depiction of that need by bracket.

### A Note On Housing Units Versus Population Growth

The city is expected to grow by 23,357 people between 2020 and 2046<sup>3</sup>. Compared to a housing need of 22,359 homes (**Figure 6**) the two projections would seem incongruous,

<sup>3</sup> *Land Capacity Analysis for the City of Spokane, 2025.*

**Figure 7: City of Spokane New Housing Need by Household Income (2020-2046)**



*Source: Spokane County HAPT, January 2025.*

*Notes: Income limits provided by United State Housing and Urban Development Department, FY2025 Income Limits Documentation System, retrieved online at [www.huduser.gov](http://www.huduser.gov).*

as if the HAPT was assuming that most new residents will live alone in their home. This is not the case, however, as HAPT provides for more than the housing units needed to accommodate new population growth.

Per the Commerce guidance on the HAPT, the allocation accounts for three areas of housing need, as follows:

- **New Growth.** The housing units to accommodate new population growth in the city between 2020 and 2046. The proportion of new housing in the HAPT corresponding to this need is approximately 60 percent of the total.
- **Underproduction.** In its study of housing needs and production in Washington, Commerce identified that, overall, the state had under-produced housing by a significant degree. This was largely due to COVID and other economic factors outside the control of Cities and Counties, but the need is there regardless. To remedy this situation, 30 percent of the HAPT housing allocation is included to address issues with overpriced housing and historic underproduction. As a result, approximately 30 percent of the HAPT allocation addresses the housing needs of people who are already residing in Spokane.
- **Homelessness.** A small percentage of the overall HAPT allocation, approximately 10 percent, is intended to address the need of those experiencing homelessness or in danger of imminent homelessness. As with underproduction, much of this need is for people already in Spokane, not new growth.

While the City of Spokane has been allocated 22,359 units between 2020 and 2046, only about 13,415 of those units are to accommodate new residents. Regardless, HB1220 states that the City must have enough capacity to accommodate the *entire* allocation, thus this analysis in this report concerns the full number of units allocated (see **Figure 6**).

### **A Note on Housing Affordability Brackets and Grouping**

While HAPT provides for housing need in seven brackets (see **Figure 6**), difficulties arise in providing such a high level of differentiation in housing data. It is near impossible to divide housing costs into so many brackets due to the limited number of zoning types and the high number of variables involved. As such, most jurisdictions have decided to group the affordability brackets into the following three groups:

- **0-80% AMI** – The highest need bracket, requiring the most program/funding support.
- **80%-120% AMI** - The middle bracket, where some support is necessary, but some market-rate development may occur as well. Some organizations label this group as “workforce housing.”
- **120%+AMI** – The highest cost group, often called “market rate” housing. Commerce’s guidance assumes little to no support for these householders.

Not only are jurisdictions using these three groupings, but the example tables and calculations in Commerce’s own guidance group affordability thus. Accordingly, the City of Spokane analysis will use the same groups.

## **VI. Determining Affordability Bracket by Geographic Location**

As demonstrated above, the HAPT indicates the City must accommodate 22,359 additional housing units between 2020 and 2046. To determine what capacity exists in the city to accommodate those units, Commerce provides specific guidelines in their “Guidance for Updating Your Housing Element,” published August 2023. This guidance directs jurisdictions to consider their zoning and which housing types might be assumed in those zones. Additionally, the guidance from Commerce directs jurisdictions to use multiple data sources to determine what affordability can be expected from various housing types. The following analysis conforms substantially to the Commerce guidance.

### **Using Zoning to Inform Housing Affordability**

The Commerce guidance indicates that jurisdictions should compare the housing types allowed in individual zones to inform what level of affordability might be expected in given areas. To this end, the City analyzed all zones in which housing is allowed and compared the housing types and densities assumed for each, as shown in **Figure 8** on the following page.

The City of Spokane is somewhat unusual, in that the municipal code allows for the development of residential uses in *all* zones except industrial zones. Additionally, most housing types (single-unit and middle housing) are allowed everywhere. Save for the lower density residential zones (RA, R1, and R2), multi-unit housing is allowed in every zone. This makes it difficult to impossible to differentiate housing development in the city only by considering zoning.

**Figure 8: Zoning Classified by Housing Type and Maximum Density**

| Zone | Housing Types Allowed          | Maximum Density Allowed | Assumed Density               | Density Group    |
|------|--------------------------------|-------------------------|-------------------------------|------------------|
| RA   | Single-Unit and Middle Housing | 10 (approximate)        | 5-9 du/ac                     | Residential Low  |
| R1   |                                | 10 (approximate)        |                               |                  |
| R2   | Middle Housing                 | 20 (approximate)        |                               |                  |
| RMF  | Middle Housing & Multi-Unit    | 30 (approximate)        | 29 du/ac                      | Residential High |
| RHD  |                                | No Limit                |                               |                  |
| NR   | Middle Housing & Multi-Unit    | No Limit                | 30.2 du/ac in 33% of the Area | Non-Residential  |
| CB   |                                |                         |                               |                  |
| GC   |                                |                         |                               |                  |
| O    |                                |                         |                               |                  |
| OR   |                                |                         |                               |                  |
| CC#  |                                |                         |                               |                  |
| CA1  |                                |                         |                               |                  |
| DTC  | Middle Housing & Multi-Unit    | No Limit                | 44.4 du/ac in 33% of the area | Downtown         |
| DTG  |                                |                         |                               |                  |
| DTU  |                                |                         |                               |                  |
| DTS  |                                |                         |                               |                  |

**Source:** Spokane Municipal Code, SMC Title 17; *Shaping Spokane, the Spokane Comprehensive Plan (Chapter 3)*; *Land Capacity Analysis for the City of Spokane (2025)*.

**Notes:** Maximum density is approximate in residential zones due to the fact that lots under 2 acres are not restricted by density—rather the SMC uses height and setbacks to control for density in these zones. Assumed Density and Density Group conform to the City's Land Capacity Analysis, adopted March 10, 2025, via resolution RES 2025-0015.

Further complicating matters, the City does not have sufficient data to correlate housing type with housing affordability as suggested by the Department of Commerce. This is not a failure by the City, rather the requirement to track such data did not exist historically, so these values weren't collected. To remedy this, the Commerce guidance provides for the option for Cities to augment and adjust affordability assumptions using publicly available market data.<sup>4</sup>

### Sources for Housing Affordability for Rentals and Purchases

Cities, Spokane included, often do not track the affordability of a given housing unit when permitting its construction. Accordingly, the City has limited internal sources that might indicate at what level of affordability housing development is occurring. As a result, the City must look outside it's own data for this information.

Per the suggestion in the Commerce guidance, the City has utilized data from multiple sources to determine housing affordability by type, including the following:

- **Home Value (purchases) by neighborhood provided by Zillow.com.** Zillow provides a combination of self-reported and industry information on home purchases, assembling that data into 'neighborhoods' that generally conform to certain parts of the city.

<sup>4</sup> See p. 32 of *Guidance for Updating Your Housing Element* by the Department of Commerce, August, 2023.



- **Home Value (purchases) by neighborhood provided by Redfin.com.** Redfin is similar to Zillow, but follows a more industry-based approach for home value, lessening the impact of individual self-reported home values skewing the results. As with Zillow, Redfin data can be divided up roughly by neighborhood.
- **Median Rents by neighborhood provided by Apartments.com.** Like with Zillow but in this case concerning rentals, Apartments.com is somewhat weighted by self-reporting while also accounting for historic data related to past listings that may not currently be open for rent.
- **Median rents by neighborhood provided by Rentcafe.com.** Similar to Redfin, RentCafe's data is backed up by industry information in addition to current active listings. RentCafe also directly contacts management companies and real estate professionals to augment their data with additional confirmation.

### **Rent/Purchase Price by Affordability Bracket**

Before a comparison can be made between median house price and monthly housing costs, the home price must be converted to an assumed mortgage payment. Following the Commerce guidance, the City utilized the Fannie Mae mortgage calculator to determine what the approximate monthly mortgage payment might be for home purchases in the City. The Fannie Mae mortgage calculator<sup>5</sup> requires the user to input various assumed factors that affect the payment amount. The factors used for this analysis were the most common factors reported by Realtor.com for home purchases in Spokane County, namely:

- 5 percent down payment;
- 30-year fixed rate loan; and
- 6.8% interest.

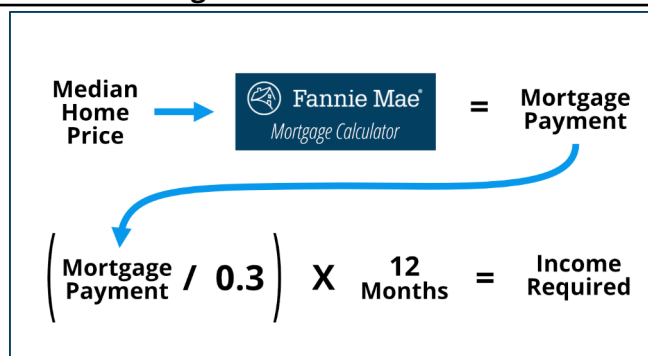
Plugging those factors into the Fannie Mae mortgage calculator returned a monthly payment for each neighborhood's median home price. That monthly value was then converted into the annual income necessary to maintain such a payment amount. For this, the Commerce assumption that 30 percent of annual income as the maximum that should go to home payments/rents was assumed. The calculation shown in **Figure 9** on the following page provided the income required for a given median home price.

The same base calculation was used to determine the income required for rentals, using the median rents provided by Apartments.com or RentCafe. Since those sources provide rents in a monthly form to begin with, the first step (using a mortgage calculator) was not necessary. Income required for a given median rent was calculated by dividing by 0.3 and multiplying by 12 only.

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<sup>5</sup> <https://yourhome.fanniemae.com/calculators-tools/mortgage-calculator>

**Figure 9: Process for Calculating Income from Median Home Price**



*Source: City of Spokane, based on WA Department of Commerce, "Guidance for Updating your Housing Element" (August 2023).*

*Notes: Fannie Mae mortgage calculator assumed a 5 percent down payment, 30-year fixed rate mortgage, and 6.8% interest, as averages provided by Realtor.com for Spokane County.*

Utilizing the calculations above, an affordability bracket can be assumed for each part of the City for both median home price (purchases) and median rent (rentals). As an example calculation for rental units, the following sample calculation utilizes the RentCafe reported average rent for the Cliff-Cannon neighborhood:

1. Average Rent = \$1,521
2. Assuming 30% of Income for Rent (Rent / 0.3) = \$5,070
3. Multiplied by 12 to convert from monthly to annual: \$60,840

Because \$60,840 falls within the 0-80%AMI bracket (see **Figure 2**), we can assume that rental units in the Cliff-Cannon neighborhood generally fall within that bracket. By using this same calculation for both sources of rental data (Apartments.com and RentCafe) the affordability bracket for each area in the city can be determined, as shown in **Figure 10** and **Figure 11** on following pages.

As an example calculation for units for purchase, the following sample uses the Zillow.com reported median home value in the Northwest Neighborhood:

1. Median Home Value = \$346,592
2. Mortgage Payment (Fannie Mae) = \$2,966
3. Assuming 30% of Income for Mortgage (Payment / 0.3) = \$9,887 a month
4. Multiplied by 12 to convert from monthly to annual = \$118,640

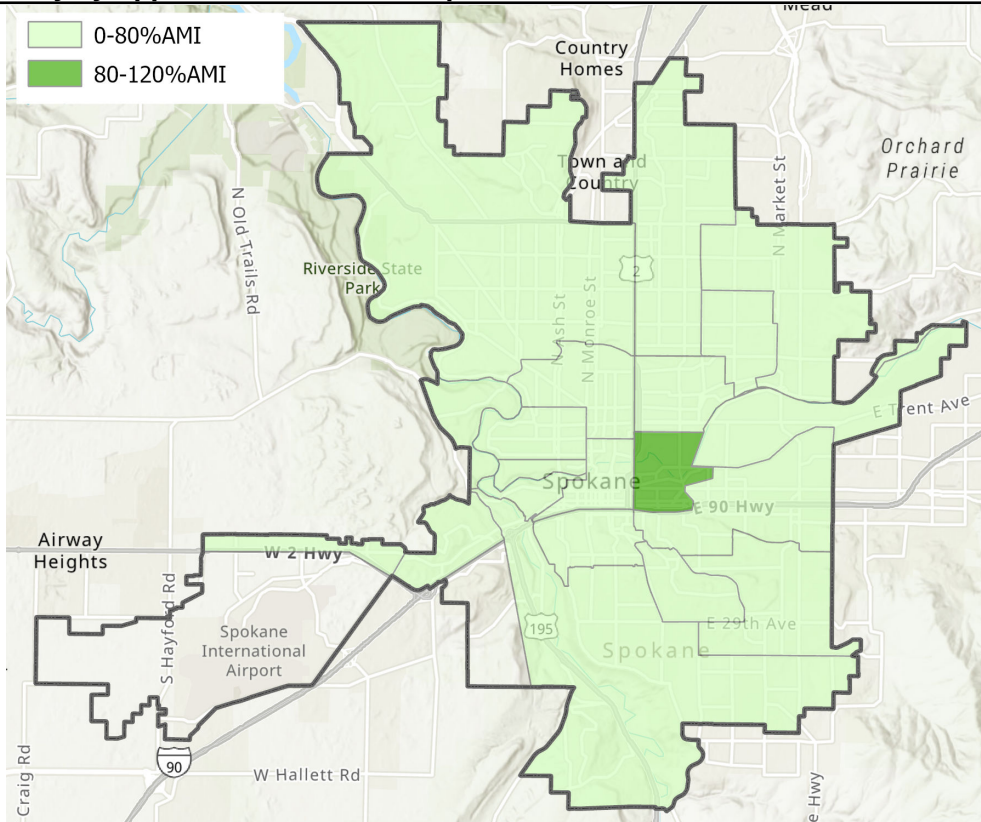
Because \$118,640 falls within the 120+%AMI bracket (**Figure 2**), we can assume that homes for purchase in the Northwest Neighborhood generally fall within that bracket. By using this method for both sources for sales data (Zillow and Redfin) the affordability bracket for each area can be determined, as shown in **Figure 12** and **Figure 13**.

Summary tables showing the calculations above for all four sources and all areas of the city are included at the end of this report. See **Appendix B** for more details.

**Figure 10: Rent Affordability by Approximate Location (Apartments.com)**

**Source:** Apartments.com, data from May 2025.

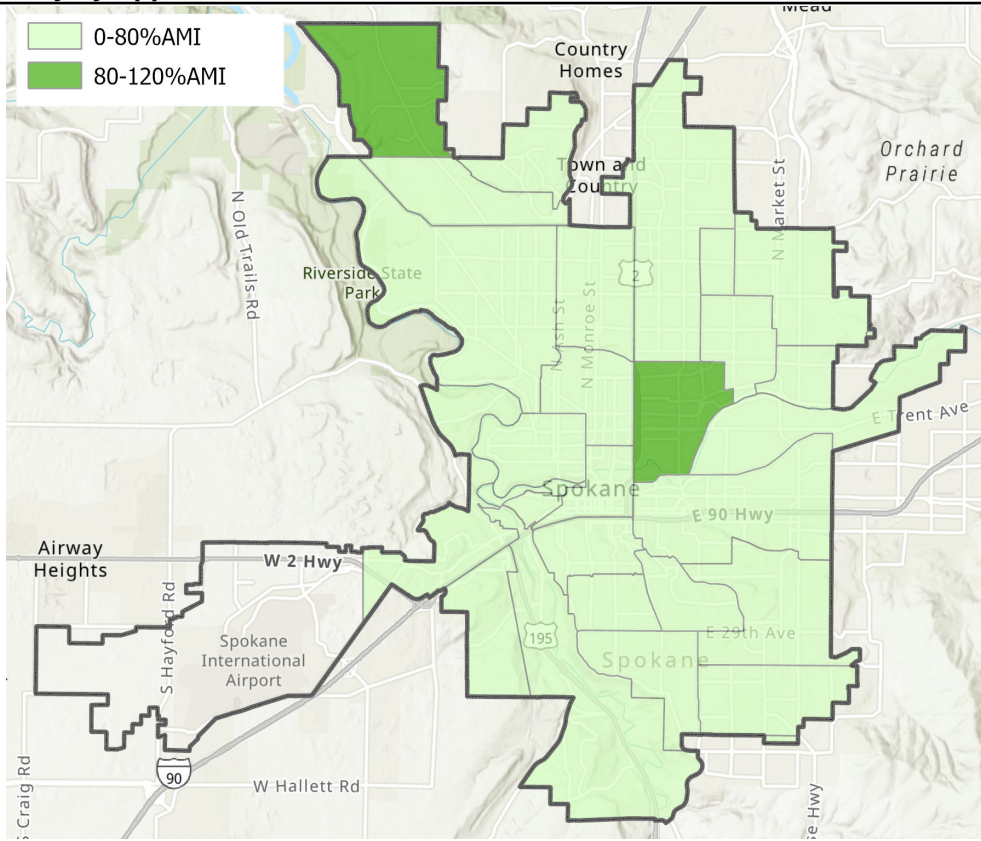
**Notes:** Areas used by the source do not necessarily match neighborhood boundaries, as shown. The source had no data for blank areas.



**Figure 11: Rent Affordability by Approximate Location (Rentcafe.com)**

**Source:** Rentcafe.com, data from May 2025.

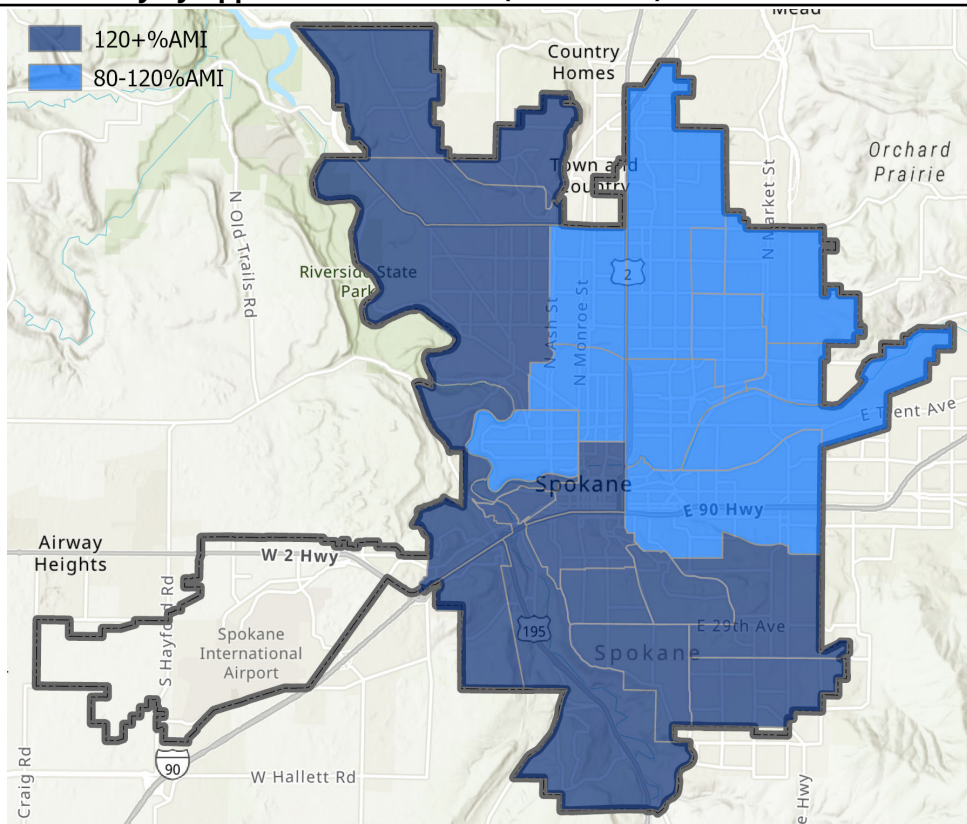
**Notes:** Areas used by the source do not necessarily match neighborhood boundaries, as shown. The blank area contains zero housing units, thus it is not shown here.



**Figure 12: Home Value Affordability by Approximate Location (Zillow.com)**

**Source:** Zillow.com, data from May 2025.

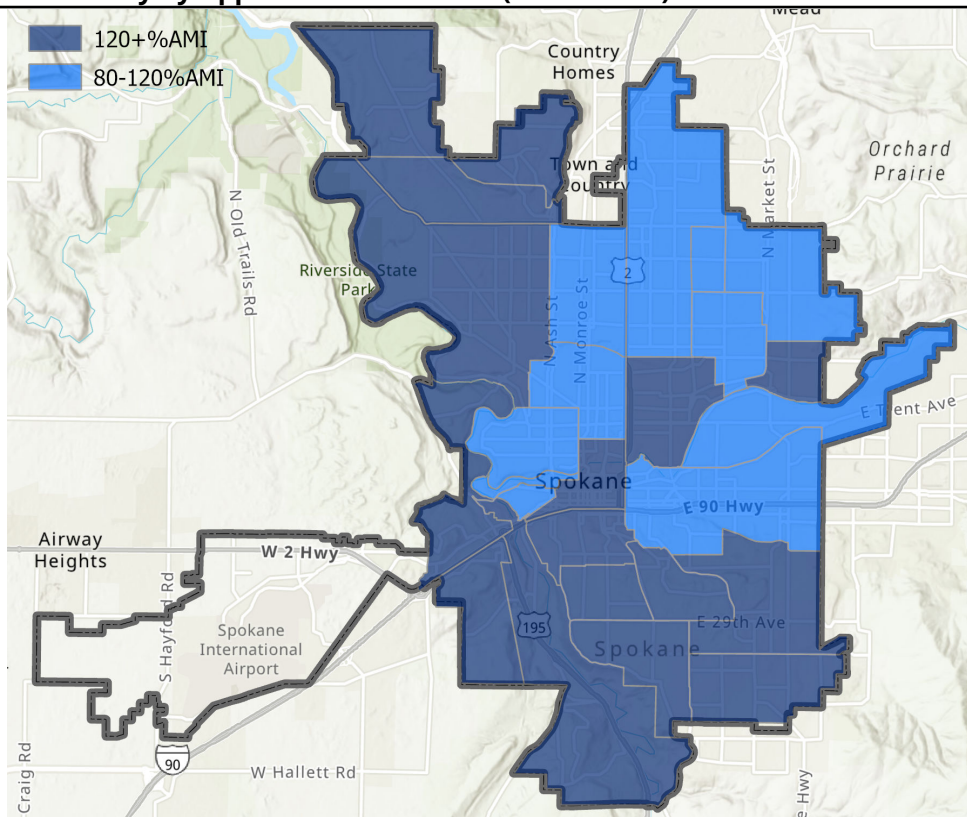
**Notes:** The source had no data for blank areas. Areas used by the source do not necessarily match neighborhood boundaries, as shown.



**Figure 13: Home Value Affordability by Approximate Location (Redfin.com)**

**Source:** Redfin.com, data from May 2025.

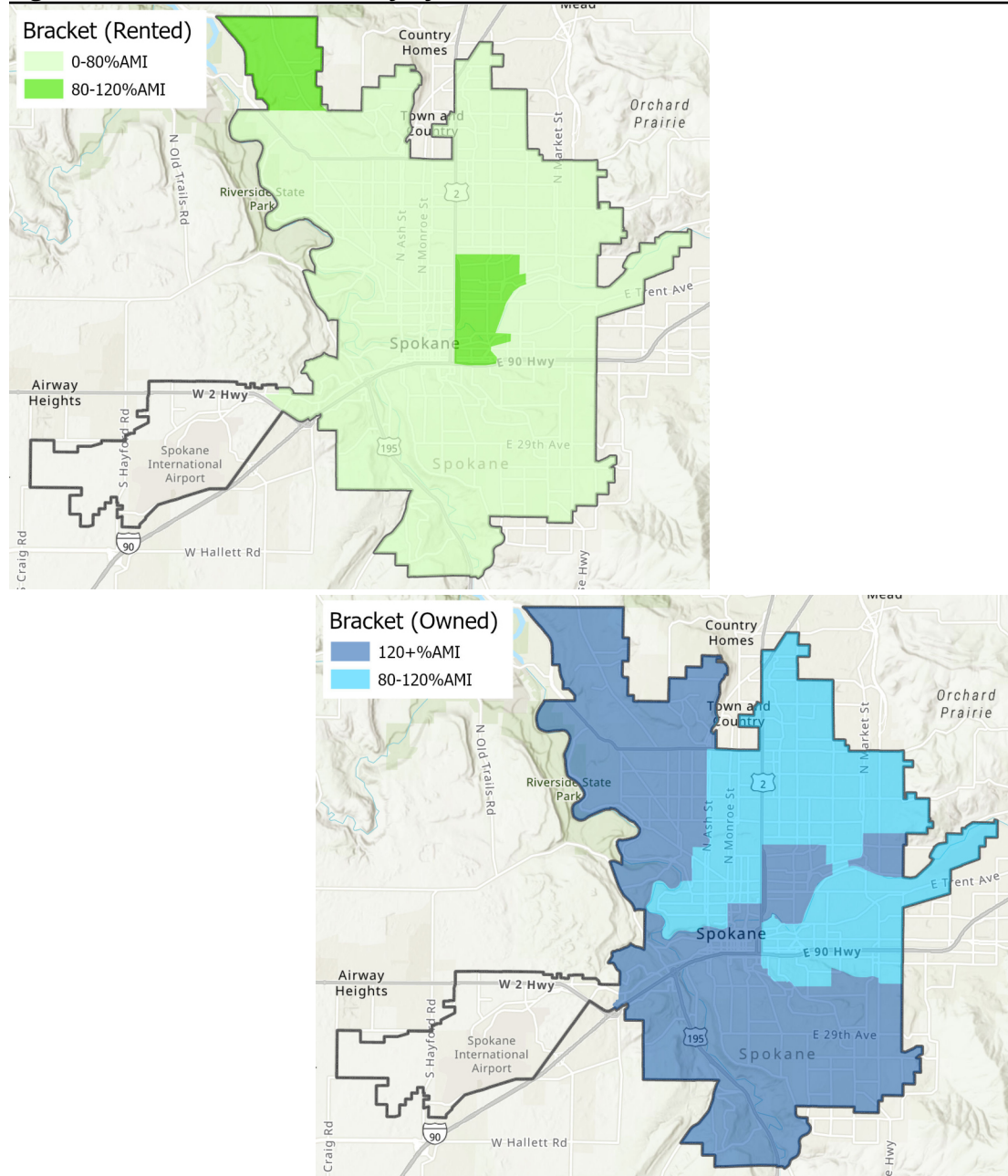
**Notes:** The source had no data for blank areas. Areas used by the source do not necessarily match neighborhood boundaries, as shown.





By comparing and combining the four maps above, general affordability assumptions can be made for both rental and purchase homes by location in the City, as shown in Figure 14. These assumptions were used by this analysis to assign assumed affordability to either rental units or homes for purchase in each part of the City.

**Figure 14: Assumed Affordability by Location–Rentals and Purchases**



*Source: City of Spokane, Synthesized from multiple sources.*

As shown above, rented units in the City generally fall within the 0-80%AMI bracket, though two smaller areas tend to be more expensive, falling within the 80-120%AMI bracket. The picture for housing units for purchase is more complex, with a somewhat even split between areas exhibiting 80-120%AMI units and areas in the 120+%AMI

bracket. By determining affordability by geography in this way, the analysis can be more nuanced as to the expected affordability of new units in the City over the next twenty years. Many jurisdictions can consider their affordability for the entire City, but the great size of Spokane (nearly 70 square miles) points to the need for a more refined analysis than simply one value for the entire city. The approach outlined above grants that higher level of detail.

### **Determining Housing Tenure**

Now that the areas of the City in which certain affordability brackets can be assumed has been established, the only remaining step is to determine which new units might be for rent and which might be for purchase. Of note, it is inaccurate to assume that all detached homes are for purchase, as the rental house market in Spokane is rather robust.

To determine the split of rented and purchase units expected in the city, this analysis utilized data from the American Communities Survey (ACS) 5-year average reports from 2023. ACS provides sample-based data to fill in between the decennial censuses, providing a relatively reliable data source for tenure (owned versus rented).

By polling ACS data, the City determined the mix of owned and rented homes in each Census Tract, resulting in the maps on the following pages (**Figure 15** and **Figure 16**). By utilizing the ratio of rented to owned homes in each tract, any capacity for new housing development in those tracts can be split accordingly into assumed rental units and units for purchase. For instance, assume a given Census Tract exhibits 60% owned and 40% rented units. That same Tract, say, shows an expected affordability of 80-120%AMI for rental units and 120%+AMI for purchased units (per Figure 14). If that tract has capacity for 100 units, 40 of those units could be assumed to be rented in the 80-120%AMI bracket and 60 units could be assumed to be sold in the 120%+AMI bracket. This is precisely the calculation used to determine final capacity in this report.

## **V. Unit Capacity by Affordability Bracket**

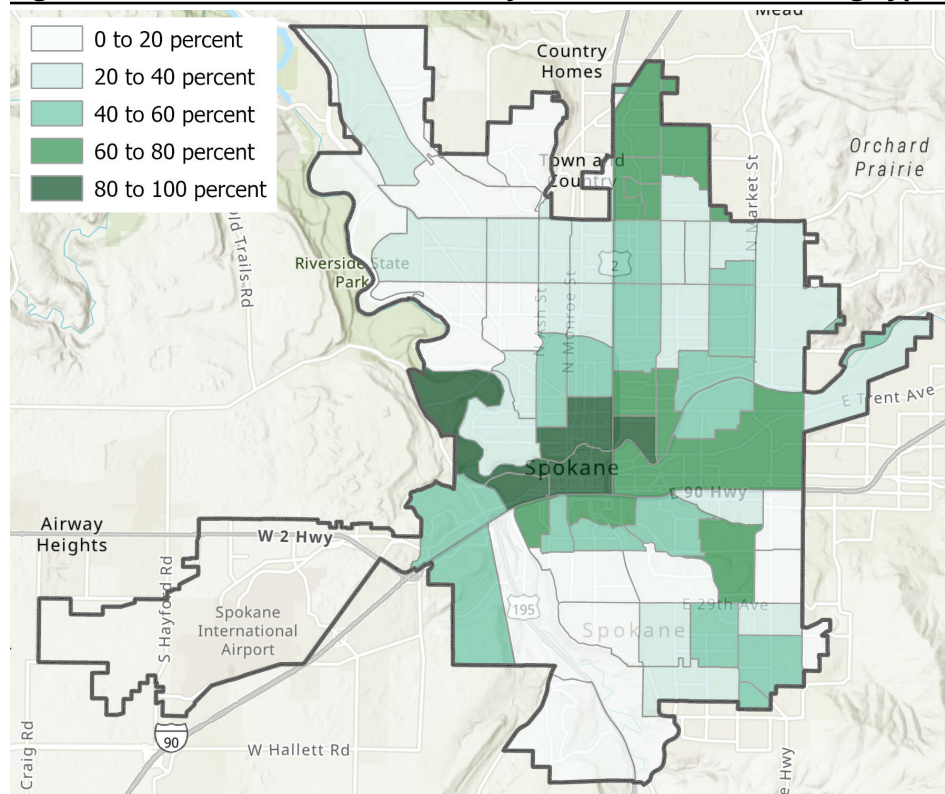
The Commerce guidance states that once a jurisdiction has determined the affordability of various housing types, zones, and locations, then the unit capacity in those areas should be incorporated into the analysis. As the City has completed its LCA<sup>6</sup>, that analysis provides a theoretical unit capacity in various locations throughout the city. Per Commerce's guidance, the unit capacity from the LCA was used in this analysis.

Because the LCA provides for potential units of capacity by geographic location within the city, each unit of capacity in the LCA can be compared to the tenure assumptions shown in **Figures 15 and 16**, producing an assumed number of rented units and owned units of capacity in each Census tract. For example, if the LCA found that 100 units of capacity exist in a tract of 60 percent owned and 40 percent rented homes, this analysis assumes that 60 units of capacity would be owned and 40 units of capacity would be rented.

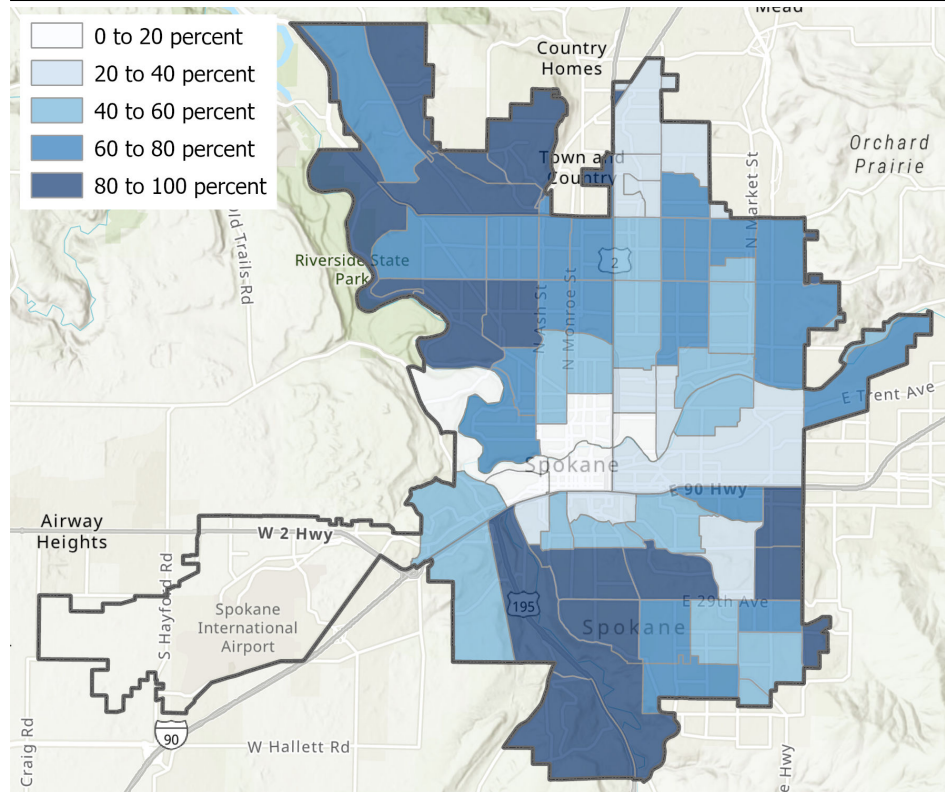
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<sup>6</sup> *Land Capacity Analysis for the City of Spokane, adopted March 10, 2025, via resolution RES 2025-0015.*

**Figure 15: Percent of Rented Homes by Census Tract (All Housing Types)**



**Figure 16: Percent of Owned Homes by Census Tract (All Housing Types)**

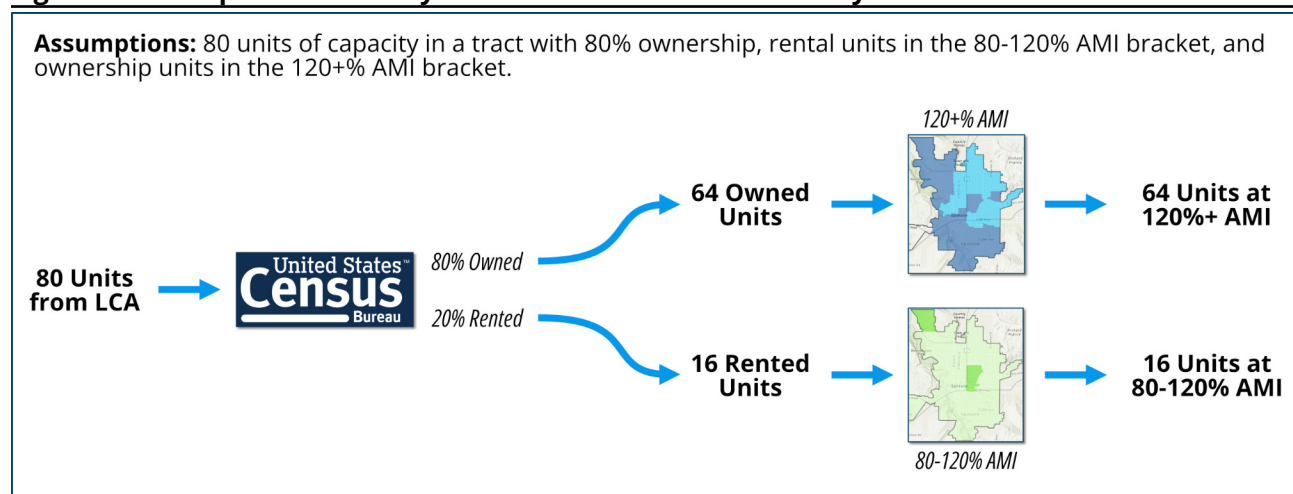


**Source (Both):** US Census Bureau, American Communities Survey, 2023 5-Year Average

**Note (Both):** Areas around the Spokane International Airport are blank due to a lack of any housing in this area.

Once the assumptions for tenure (owned versus rented) are applied to units of capacity in the LCA, the affordability of those units can be inferred by comparing the location to the affordability in **Figure 14**. A schematic example of this calculation is shown below (**Figure 17**).

**Figure 17: Example Affordability Calculation–LCA to Affordability Bracket**



### Special Cases in the Land Capacity Analysis

The LCA considers two special areas in its analysis, those of adopted Planned Unit Developments (PUDs) that have not yet completed platting all lots, and the South Logan Transit Oriented Development (South Logan TOD) subarea analysis. Readers are referred to the LCA itself for details on how these areas were handled in the LCA.

Following the process in the LCA, the analysis of affordability herein considers the PUDs and South Logan TOD area separately as well. This is for the same reason—a greater level of specificity is known about the development potential in these areas. Regarding the PUDs, these typically involve either single-unit homes or multi-unit buildings as part of a larger planned development with (generally) higher costs for residents, both rented or purchased. Accordingly, for any units of capacity within PUDs the analysis in this report assumes those units to occur at the more costly affordability bracket—namely 80-120% AMI for rental units and 120+% AMI for purchased homes. Additionally, most PUDs include covenants that restrict the renting of homes within PUDs. As a result, this analysis assumes that 100 percent of single unit homes in PUDs will be for purchase. Likewise, all multi-unit potential in PUDs is assumed to be for rent.

When considering the South Logan TOD area, the project area located in a part of the City with the least affordable brackets in both rentals and purchase homes. Accordingly, all units in the South Logan TOD area are assumed by this analysis to be in the 120+% AMI bracket for purchase and the 80-120% AMI bracket for rentals.

## VI. Housing Unit Development Since 2020

The housing allocation provided by Commerce via the HAPT establishes need between the years 2020 and 2046. Because development has continued since 2020 and the unity



capacity presented by the LCA is for 2025, housing units built between 2020 and 2025 should be accounted for. In essence, any unit constructed between 2021 and now would reduce the overall need identified by the HAPT.

To do this, all residential permits issued between January 1, 2021 and December 31, 2024 were pulled from the City's permit database. All completed units--those issued a Certificate of Occupancy or indicating a successful final inspection--were geo-located and compared to the affordability assumptions in Figure 14, resulting in a tabulated number of completed units in each of the affordability brackets. These units were then subtracted from the "new" units called for in HAPT. This number of completed units is included in the final table of this report (see below).

**VII. RESULTS: Housing Unit Capacity by Affordability Bracket**

Overall, the LCA found that the City has sufficient theoretical capacity to accommodate slightly more than 30,000 dwelling units. By applying those units of capacity to the assumptions and calculations described in the sections above, those units are divided among the three affordability brackets as follows (see Figure 18):

According to this analysis, informed by and in compliance with the guidance of the

**Figure 18: Final Results–City of Spokane Housing Unit Capacity by Affordability**

|                            | 0-80%AMI Units | 80-120%AMI Units | 120+%AMI Units |
|----------------------------|----------------|------------------|----------------|
| Need (Commerce HAPT)       | 15,347         | 2,588            | 4,424          |
| Completed Units Since 2020 | 1,328          | 507              | 978            |
| Resulting Unit Capacity    | 9,654          | 8,036            | 12,475         |
| Comparison RESULT          | -4,365         | 5,955            | 9,029          |

*Source:* Need = Department of Commerce Housing Allocation Planning Tool (HAPT). Completed Units: City of Spokane, Acella Data 2021 to 2024. Unit Capacity = Land Capacity Analysis for the City of Spokane, 2025, classified per the analysis outlined in this report.

*Notes:* Completed units represent those building permits issued by the City between January 1, 2021 and December 31, 2024, showing that either a certificate of occupancy was issued or a final inspection has been completed.

Resulting unit capacity represents the result of the analysis and calculations described in this report.

Comparison represents the following calculation: (Completed Units + Unit Capacity) - Need = Comparison RESULT. A negative number denotes a lack of sufficient capacity in that affordability bracket to accommodate the need identified by HAPT.

Department of Commerce, **the City of Spokane does not currently contain sufficient capacity to accommodate needed growth in the 0-80%AMI bracket.** Concurrently, the City has excess capacity in both the 80-120% AMI bracket and the 120+% AMI bracket.

To comply with the requirements of House Bill 1220, the City must consider, as part of the overall Comprehensive Plan Periodic Update, actions sufficient to raise the capacity in the 0-80%AMI bracket by nearly 4,400 units. Those changes will likely be identified during the preparation of the Environmental Impact Statement for the Comprehensive Plan Update, as well as during preparation of the Update itself. For more information on these changes as they are developed, readers are encouraged to visit [www.planspokane.org](http://www.planspokane.org).



## **Appendix A: Housing Allocation Planning Tool Documentation**

*Appendix to Accommodating Affordable Housing in the City of Spokane, 2025*

BEFORE THE BOARD OF COUNTY COMMISSIONERS  
OF SPOKANE COUNTY, WASHINGTON

IN THE MATTER OF CONSIDERING THE  
SPOKANE COUNTY STEERING COMMITTEE  
OF ELECTED OFFICIALS (SCEO)  
RECOMMENDATION RELATED TO THE  
HOUSING FOR ALL PLANNING TOOL (HAPT)  
METHODOLOGY FOR HOUSING  
ALLOCATIONS

**RESOLUTION**

**WHEREAS**, pursuant to the provisions of RCW 36.32.120(6), the Board of County Commissioners of Spokane County, Washington, hereinafter referred to as the "Board," has the care of county property and the management of county funds and business; and

**WHEREAS**, pursuant to the provisions of Chapter 36.70.040 RCW, the Board has created a Planning Department, hereinafter referred to as the "Department," and a Planning Commission, hereinafter referred to as the "Commission" (Resolution No. 76-698 as amended by Resolution 23-0057); and

**WHEREAS**, pursuant to RCW 36.70A.210, the Steering Committee of Elected Officials ("Steering Committee") was established by interlocal agreement (Resolution 1994-1686, and as amended thereafter from time to time) to assist in the development of the Countywide Planning Policies and perform other duties, including but not limited to providing recommendations to the Board of County Commissioners on the same; and

**WHEREAS**, the Planning Technical Advisory Committee (PTAC), consisting of technical staff from the various jurisdictions, is tasked with providing a report and recommendation to the Steering Committee on proposed amendments to the Countywide Planning Policies; and

**WHEREAS**, pursuant to the provisions of chapters 36.70 and 36.70A RCW, the Board adopted a Comprehensive Plan for Spokane County on November 5, 2001 (Board Resolutions 1-1059 and 1-1060), which has been thereafter amended from time to time; and

**WHEREAS**, pursuant to the provisions of chapters 36.70 and 36.70A RCW, the Board, on May 25, 2004, under Spokane County Resolution No. 04-0461, adopted a new Zoning Code to implement the goals and policies of the Comprehensive Plan, said regulation becoming effective June 1, 2004, which has been thereafter amended from time to time; and

**WHEREAS**, in accordance with RCW 36.70A.130, the county must review and update its comprehensive plan and development regulations every ten years, with the next update due by 2026; and

**WHEREAS**, SCEO held a public hearing on the proposed "A Prime" HAPT methodology on 9/25/24 and considered comments from the Planning Technical Advisory Committee (PTAC). No public comment or testimony in favor of or against the proposed methodology was received; and

**WHEREAS**, after deliberation, the Steering Committee unanimously recommended approval of the proposed Spokane County "A Prime" HAPT methodology for use in each constituent's 2026 comprehensive plans; and

**WHEREAS**, pursuant to RCW 36.70 A, the county and the cities within it must update their comprehensive

plans based on a countywide population for the 20-year planning period as projected by the Office of Financial Management; and

**WHEREAS**, as the regional government, the county is tasked with the adoption of the Countywide Planning Policies, a part of which includes the adoption of the Countywide Population Projection as well as sub-allocations of population to the cities within the county; and

**WHEREAS**, the Spokane County planning commission held workshops examining HAPT on 6/13/24 and 7/11/24; and

**WHEREAS**, SCEO held workshops examining HAPT on 5/15/24, 7/17/24 and 8/20/24; and

**WHEREAS**, the Board of County Commissioners received the SCEO recommendation on January 14<sup>th</sup>, 2025, and set January 21<sup>st</sup>, 2025, to consider the same; and

**WHEREAS**, at the January 21<sup>st</sup>, 2025, open public meeting the Board considered the recommendation of the SCEO, and the Department filed and voted on whether to adopt the same.

**NOW THEREFORE BE IT RESOLVED**, the Board hereby adopts the "A Prime" HAPT methodology for the purpose of allocating housing units for the planning period of 2026- 2046.

**PASSED AND ADOPTED** this 21<sup>st</sup> day of January 2025.


ATTEST:

  
Ginna Vasquez, Clerk of the Board

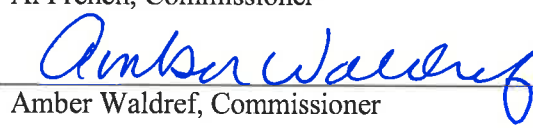


BOARD OF COUNTY COMMISSIONERS  
OF SPOKANE COUNTY, WASHINGTON

  
Mary L. Kundy, Chair

  
Josh Kerns, Vice-Chair

  
Al French, Commissioner

  
Amber Waldref, Commissioner

  
Chris Jordan, Commissioner

# MEMORANDUM

|              |  |
|--------------|--|
| <b>To:</b>   | Steering Committee of Elected Officials (SCEO)                 |
| <b>From:</b> | Planning Technical Advisory Committee (PTAC)                   |
| <b>Via:</b>  | Spokane County Building and Planning                           |
| <b>Date:</b> | September 16, 2024   |
| <b>Re:</b>   | PTAC Recommendation, Housing for All Planning Tool methodology |

## Background Summary

Earlier this year, SCEO tasked PTAC with analyzing possible HAPT methodologies.

During this exploration, PTAC analyzed:

- Methods A and B
- Commerce's update of method A (A Prime), wherein the county's share is split between the unincorporated UGAs and rural areas.
- Custom methods created by other counties (Lewis, King, Skagit, and Snohomish)
  - Lewis, Skagit, and Snohomish's custom methodologies were found to be not applicable to Spokane County.
  - King County's custom methodology served as the basis for a Spokane County proposal that was brought before PTAC and SCEO.
- Two possible custom methods, including
  - Weighted transit
    - This methodology would have allocated low-income housing partially based on transit availability.
      - Was not carried forward, owing to a lack of support from PTAC.
  - Jobs to housing ratio
    - This methodology, based on King County's custom method, adjusts 0-50% allocations based on the ratio of low-income jobs (under \$40,000) to low-income residents.
      - Was not carried forward, owing to a lack of support from PTAC.

## Options Going Forward

SCEO has two options:

1. Adopt one of the base Commerce methodologies (A, A prime, or B).
  - a. Adoption of A prime is recommended by PTAC.
2. Continue pursuing a custom methodology (method C).
  - a. Any potential custom method will require clear guidance from SCEO on what changes are desired. There is no readily available data to accommodate such an exploration, so it would likely require a significant commitment of staff time.

## Recommendation

PTAC recommends using HAPT Method A Prime. Method A Prime uses the same assumptions and calculations as Method A but allows for a distinction between rural County lands, unincorporated UGAs, and the incorporated jurisdictions. Additional details on this recommendation, along with the housing allocation numbers based on the current population allocation, can be found below.

## Methodology Pros/Cons

| Method  | Pros   | Cons  |
|---|--|---|
| A   | Equally distributes housing levels among jurisdictions, based on growth projections;<br>Simplicity and clarity   | Allocates low-income and emergency housing to rural areas   |
| A Prime   | Reserves lower-income housing for urban areas;<br>Avoids placing emergency housing in rural areas  | None identified by PTAC   |
| B   | Accounts for existing housing by allocating fewer units per income band to jurisdictions that have a larger share of housing in said income band than other jurisdictions                | Allocates low-income and emergency housing to rural areas; creates negative housing allocations, the implications of which are not well understood.         |
| C: Low-income jobs to low-income residents' ratio | Accounts for an additional piece of local analysis that factors in housing and employment locations, identifying locations where lower wage jobs exist but not enough lower cost housing | What weight to give the analysis is unknown;<br>Lack of support from jurisdictions;<br>Concerns about the amount of time needed to perfect this methodology |

## Housing Allocation Numbers (Corrected)

|                                    | Method A Prime                  |               |              |               |              |              |              |               |           |              |
|------------------------------------|---------------------------------|---------------|--------------|---------------|--------------|--------------|--------------|---------------|-----------|--------------|
|                                    | Housing Allocation Income Bands |               |              |               |              |              |              |               |           |              |
|                                    | 0-30% AMI                       |               |              |               |              |              |              |               | Temporary |              |
|                                    | Total                           | Non-PSH       | PSH          | 30-50%        | 50-80%       | 80-100%      | 100-120%     | >120%         | Emergency | Housing      |
| <b>Total Countywide Allocation</b> | <b>75,184</b>                   | <b>19,905</b> | <b>5,714</b> | <b>13,620</b> | <b>8,844</b> | <b>4,772</b> | <b>3,937</b> | <b>18,392</b> |           | <b>3,037</b> |
| Unincorporated UGA                 | 22,946                          | 6,375         | 1,830        | 4,362         | 2,699        | 1,456        | 1,202        | 5,022         |           | 973          |
| Rural Outside UGA                  | 3,534                           | 0             | 0            | 0             | 416          | 225          | 185          | 2,708         |           | 0            |
| Airway Heights                     | 5,007                           | 1,391         | 399          | 952           | 589          | 318          | 262          | 1,096         |           | 212          |
| Cheney                             | 2,535                           | 704           | 202          | 482           | 298          | 161          | 133          | 555           |           | 107          |
| Deer Park                          | 1,023                           | 284           | 82           | 194           | 120          | 65           | 54           | 224           |           | 43           |
| Fairfield                          | 0                               | 0             | 0            | 0             | 0            | 0            | 0            | 0             |           | 0            |
| Latah                              | 0                               | 0             | 0            | 0             | 0            | 0            | 0            | 0             |           | 0            |
| Liberty Lake                       | 6,601                           | 1,834         | 526          | 1,255         | 776          | 419          | 346          | 1,445         |           | 280          |
| Medical Lake                       | 179                             | 50            | 14           | 34            | 21           | 11           | 9            | 40            |           | 8            |
| Millwood                           | 36                              | 10            | 3            | 7             | 4            | 2            | 2            | 8             |           | 2            |
| Rockford                           | 53                              | 15            | 4            | 10            | 6            | 3            | 3            | 12            |           | 2            |
| Spangle                            | 0                               | 0             | 0            | 0             | 0            | 0            | 0            | 0             |           | 0            |
| Spokane (City)                     | 17,550                          | 4,875         | 1,400        | 3,336         | 2,066        | 1,115        | 918          | 3,840         |           | 744          |
| Spokane Valley                     | 15,713                          | 4,365         | 1,253        | 2,987         | 1,848        | 997          | 823          | 3,440         |           | 666          |
| Waverly                            | 7                               | 2             | 1            | 1             | 1            | 0            | 0            | 2             |           | 0            |

Note: Jurisdictions are NOT required to ensure that these units are built. They must simply have zoning, regulations and development codes that allow these units to be built.

## Housing Allocation Numbers (Original)

|                                    | Method A Prime                  |               |              |               |              |              |              |               |           |              |
|------------------------------------|---------------------------------|---------------|--------------|---------------|--------------|--------------|--------------|---------------|-----------|--------------|
|                                    | Housing Allocation Income Bands |               |              |               |              |              |              |               |           |              |
|                                    | 0-30% AMI                       |               |              |               |              |              |              |               | Temporary |              |
|                                    | Total                           | Non-PSH       | PSH          | 30-50%        | 50-80%       | 80-100%      | 100-120%     | >120%         | Emergency | Housing      |
| <b>Total Countywide Allocation</b> | <b>75,184</b>                   | <b>19,905</b> | <b>5,714</b> | <b>13,620</b> | <b>8,844</b> | <b>4,772</b> | <b>3,937</b> | <b>18,464</b> |           | <b>3,037</b> |
| Unincorporated UGA                 | 22,946                          | 6,375         | 1,830        | 4,362         | 2,699        | 1,456        | 1,202        | 5,022         |           | 973          |
| Rural Outside UGA                  | 3,534                           | 0             | 0            | 0             | 416          | 225          | 185          | 2,780         |           | 0            |
| Airway Heights                     | 5,007                           | 1,391         | 399          | 952           | 589          | 318          | 262          | 1,096         |           | 212          |
| Cheney                             | 2,535                           | 704           | 202          | 482           | 298          | 161          | 133          | 555           |           | 107          |
| Deer Park                          | 1,023                           | 284           | 82           | 194           | 120          | 65           | 54           | 224           |           | 43           |
| Fairfield                          | 0                               | 0             | 0            | 0             | 0            | 0            | 0            | 0             |           | 0            |
| Latah                              | 0                               | 0             | 0            | 0             | 0            | 0            | 0            | 0             |           | 0            |
| Liberty Lake                       | 6,601                           | 1,834         | 526          | 1,255         | 776          | 419          | 346          | 1,445         |           | 280          |
| Medical Lake                       | 179                             | 50            | 14           | 34            | 21           | 11           | 9            | 40            |           | 8            |
| Millwood                           | 36                              | 10            | 3            | 7             | 4            | 2            | 2            | 8             |           | 2            |
| Rockford                           | 53                              | 15            | 4            | 10            | 6            | 3            | 3            | 12            |           | 2            |
| Spangle                            | 0                               | 0             | 0            | 0             | 0            | 0            | 0            | 0             |           | 0            |
| Spokane (City)                     | 17,550                          | 4,875         | 1,400        | 3,336         | 2,066        | 1,115        | 918          | 3,840         |           | 744          |
| Spokane Valley                     | 15,713                          | 4,365         | 1,253        | 2,987         | 1,848        | 997          | 823          | 3,440         |           | 666          |
| Waverly                            | 7                               | 2             | 1            | 1             | 1            | 0            | 0            | 2             |           | 0            |

Note: These numbers, which were included in the original staff report, contain small errors that incorrectly represent the current HAPT allocation. These errors have been corrected in the table on the top of this page.

**SPOKANE COUNTY STEERING COMMITTEE OF ELECTED OFFICIALS**

1026 W Broadway • Spokane WA 99260-0170 • 509.477.1500 • bphelp@spokanecounty.org

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December 17, 2024

Mary Kuney, Chair  
Spokane County Board of County Commissioners  
1026 W. Broadway Ave.  
Spokane, WA 99260

RE: Steering Committee of Elected Officials Recommendation for the 2026-2046 Spokane County Housing for All Planning Tool (HAPT) methodology

Chair Kuney and Commissioners,

As required by the Spokane County Interlocal Agreement titled Growth Management Act (GMA Joint Planning) Section 3 D, I am forwarding the recommendation of the Steering Committee of Elected Officials (SCEO) regarding the adoption of the Spokane County Housing for All Planning Tool (HAPT) methodology for the planning period of 2026-2046 for use by the County and constituent communities in planning for future growth and housing allocations under the GMA.

The SCEO held a public hearing on the proposed amendment on September 25, 2024, and considered comments from the Planning Technical Advisory Committee (PTAC). There was no public comment or testimony in favor of or against the proposed amendment.

After deliberation, the Steering Committee unanimously recommended approval of the proposed Spokane County 2026-2046 HAPT methodology.

Sincerely,

Al French, Commissioner of Spokane County,  
Chair, Spokane County Steering Committee of Elected Officials



Submit to Clerk of the Board with available supporting materials (Resolutions, Agreements, Presentations, etc.)

## AGENDA SHEET

**SUBMITTING DEPARTMENT:** *Building & Planning*

**CONTACT PERSON:** *Scott Chesney, Laurie Carver*

**PHONE NUMBER:** *477-7212, 509-477-7127*

**CHECK TYPE OF MEETING BELOW:** **BELOW FOR CLERK'S USE ONLY:**

☒ Regular Legislative Session Agenda

Clerk's Resolution No.

**25 - 0033**

Approved:

Majority/Unanimous

Denied:

Majority/Unanimous

Renews/Amends No.

Public Works No.

Purchasing Dept. No.

**AGENDA TITLE** (please provide a reasonably descriptive agenda title for this item): Consider the SCEO Recommendation for the Housing for all Planning Tool Methodology (HAPT)

**DESCRIPTIVE SUMMARY** (please provide anticipated fiscal and budgetary information & reason for request): On September 25, 2024, the Steering Committee of Elected Officials voted to adopt HAPT method A-Prime based on the Planning Technical Advisory Committee recommendation. Method A-Prime allocates housing units based primarily on the share of growth each jurisdiction is projected to receive.

**FISCAL IMPACT** (please provide anticipated fiscal and budgetary impact, with amount and source of funds, if applicable): NA

**REQUESTED BOARD ACTION** (if any):

Other County Departments Impacted - List any other departments that were notified in advance of this agenda item: Legal

This Item will need to be codified in the Spokane County Code: No

## **Recommendation for HAPT: Housing Share**

**PLANNING TECHNICAL ADVISORY COMMITTEE**

*Report and Recommendation to the Steering Committee of Elected Officials*

Periodic Update under the Growth Management Act, 2026 to 2046

Written and Recommended by PTAC, January 2025

## Executive Summary

The Planning Technical Advisory Committee (PTAC) has identified a possible issue with previous runs of the Housing for All Planning Tool (HAPT), which all communities planning under the Growth Management Act have been advised to use when allocating housing by affordability for the region. The intended input for the tool—the data that is provided to the tool and then used to calculate each jurisdiction’s housing allocation—is the share of housing growth each jurisdiction is expected to accommodate. Unfortunately, due to unclear instructions, the previous HAPT outputs shared with the Steering Committee of Elected Officials (SCEO) used the share of population growth instead.

Following a review of the data and the HAPT itself, **the PTAC recommends that the region use housing growth share as the input for the HAPT**, specifically a housing growth share created by applying the same assumptions built into the HAPT tool itself to convert the adopted population share to housing share.

Of note, this recommendation does not affect which method within HAPT is utilized. The existing SCEO recommendation for the method known as “A Prime” is not affected by PTAC’s recommendation in this memo.

The full output of the HAPT, assuming that housing share generated in the way recommended by PTAC is used, is attached to the end of this memo.

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## Introduction

Following the SCEO vote to recommend Method “A Prime” when using the HAPT, the members of PTAC identified that there had been some confusion as to which inputs should be provided to the HAPT when calculating housing share. As a result, PTAC’s Housing Subcommittee met several times in the third and fourth quarters of 2024 to consider how this might affect the housing allocation output from HAPT. In essence, it appears to PTAC that the HAPT was intended to be provided with the share of housing growth each jurisdiction is expected to accommodate, while previous use of the HAPT utilized the share of population growth instead.

After discussing this at length, PTAC has developed a method for converting the currently adopted Population Share<sup>1</sup> to housing growth share, which can then be input into HAPT. This memo outlines the recommendation by PTAC for doing this, and provides the summary growth numbers for each jurisdiction that results.

## HAPT Method A Prime

At their meeting on September 25, 2024, the SCEO voted to recommend the use of the “A Prime” method in the HAPT. Throughout this discussion and recommendation by PTAC, no change to this method is anticipated or recommended. PTAC feels that SCEO’s original recommendation, adopted on September 24, 2024, does not require revision to accommodate PTAC’s recommendations herein.

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<sup>1</sup> Adopted by BOCC Resolution 24-0348 on June 18, 2024.

## Housing Share versus Population Share

When PTAC and SCEO previously saw the “A Prime” results, it was always using the share of population growth assigned to each jurisdiction per the adopted allocation<sup>2</sup>. However, after multiple conversations within PTAC and with Commerce staff, it was apparent that the instructions in HAPT were unclear and that the tool was instead asking for the share of housing growth.

The share of population growth and the share of housing growth *are* directly related to each other, but due to certain factors they are rarely the same number for a given jurisdiction. For instance, household size (people per household) in each jurisdiction is not the same nor does it stay static over time. Household size is continually changing from year to year. Furthermore, some jurisdictions contain a larger amount of group quarters housing (i.e. college dorms, prisons, treatment centers) and that rate changes over time. Those living in group quarters do not require additional housing units, thus they must be subtracted from the overall population growth share for each jurisdiction.

Because of these factors, it is important to develop a share of housing each jurisdiction for the entirety of the planning horizon (through 2046), not just today. Jurisdictions differ from each other and some attempt to differentiate their allocations accordingly should be made as well.

## A Note on the Underproduction of Housing

An additional factor has been raised by public commenters and PTAC members that is worth discussing here. That factor is the known historic underproduction of housing statewide. Commerce’s research has made it clear that development in jurisdictions across the state have been lower than what is required to house existing populations. As a result, many jurisdictions’ current housing stock is already too small to accommodate the need of the existing population, not to mention the growth that is coming.

It is important to note that HAPT factors this underproduction into its results. Accordingly, the number of housing units a jurisdiction may be allocated when using HAPT will appear high when compared to population growth. This is specifically because HAPT attempts to also allocate sufficient housing to accommodate the recent underproduction of housing *as well as* future growth. This condition is true regardless of which input is used for HAPT.

## Determining Housing Share

The Department of Commerce has not provided jurisdictions with a method for calculating housing growth share. Likewise, GMA does not mandate that Cities and Counties use a particular method to develop housing share. However, the PTAC subcommittee found that the HAPT itself provides one possible method.

While PTAC spent considerable time exploring other ways to convert population growth to housing growth, ultimately PTAC felt that because the resulting housing share would be input into HAPT, it was most defensible to use the assumptions already built into HAPT to calculate housing share. That way, the same set of assumptions would be applied to all parts of the tool and any unintentional bias or modification of results would be minimized.

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<sup>2</sup> Adopted by BOCC Resolution 24-0348 on June 18, 2024.

Essentially, the housing share for each jurisdiction would be calculated directly from the population share already adopted by the BOCC. While it is more sophisticated than can be expressed simply here, the method for calculating housing share from population share is generally<sup>3</sup> as follows:

**$[(\text{Population Share} - \text{Group Quarters Population}) / \text{Household Size}] + 6\%$  to Account for Vacant Homes**

For the purposes of the HAPT, the tool assumes that household size is shrinking over time and that each jurisdiction will see the same share of group housing in the County as they are in 2020. The resulting housing share for each jurisdiction and area is as shown in the following table. Again, when considering the resulting housing share, the following should be kept in mind:

- Population share and housing share are not the same thing, though they are related to one another.
- Housing share in the tool is somewhat elevated to account for historic underproduction of housing.

**Table 1: Population and Housing Share Compared**

| Jurisdiction             | Share:<br>Population<br>Growth | Share:<br>Housing<br>Growth | Jurisdiction   | Share:<br>Population<br>Growth | Share:<br>Housing<br>Growth |
|--------------------------|--------------------------------|-----------------------------|----------------|--------------------------------|-----------------------------|
| Spokane County (Whole)   | 100.00%                        | 100.00%                     | Airway Heights | 6.66%                          | 5.26%                       |
| All Unincorporated Areas | 35.21%                         | 31.14%                      | Cheney         | 3.37%                          | 2.76%                       |
| Unincorporated Rural     | 4.70%                          | 8.24%                       | Deer Park      | 1.36%                          | 1.44%                       |
| Unincorporated UGA       | 30.51%                         | 22.81%                      | Fairfield      | 0.00%                          | 0.00%                       |
| Incorporated County      | 64.79%                         | 68.95%                      | Latah          | 0.00%                          | 0.00%                       |
|                          |                                |                             | Liberty Lake   | 8.78%                          | 6.89%                       |
|                          |                                |                             | Medical Lake   | 0.24%                          | 0.44%                       |
|                          |                                |                             | Millwood       | 0.05%                          | 0.14%                       |
|                          |                                |                             | Rockford       | 0.07%                          | 0.09%                       |
|                          |                                |                             | Spangle        | 0.00%                          | 0.02%                       |
|                          |                                |                             | Spokane        | 23.34%                         | 29.74%                      |
|                          |                                |                             | Spokane Valley | 20.90%                         | 22.16%                      |
|                          |                                |                             | Waverly        | 0.01%                          | 0.02%                       |

As shown in the table, when comparing population share to housing share, some jurisdictions are expected to accommodate a lower share of housing growth than population growth (e.g. Liberty Lake) while others are shown to expect a higher share of housing than population (e.g. the City of Spokane). Why this happens is complex and due to the fact that HAPT uses multiple factors from multiple sources to determine these amounts.

Because the HAPT only has one input for each jurisdiction—share of housing growth—those jurisdictions where the housing share is larger than population share can expect their housing number output from HAPT to increase when compared to the sample outputs discussed by SCEO previously. Conversely,

<sup>3</sup> The assumptions in HAPT are more sophisticated than this, accounting for changes over time and each jurisdiction's share of certain values. Replication of the numbers herein by using this simplified equation should not be considered when evaluating this recommendation.

jurisdictions with smaller housing share than population share can expect their HAPT output to decrease over earlier results.

### Comparing HAPT Results from Prior Versions and Now

As a handy comparison of how overall housing allocations would change when housing share is input into HAPT rather than population share, the table at right lists the total housing allocation using both inputs. Also shown is whether the total housing units would increase or decrease for each jurisdiction when using housing share, as the tool intended.

While housing share is the intended input for HAPT, using housing share would increase the housing allocation to the rural areas (outside the UGA). To a greater degree, the larger jurisdictions would also be subject to a larger allocation.

It's important to note that while this represents a large change for some jurisdictions, increased allocations to those communities in the center of the UGA (City of Spokane, Spokane Valley) is consistent with the requirements of GMA, wherein growth should be concentrated in the UGA and limited on the edges.

**Table 2: Comparison of HAPT Total Housing by Jurisdiction**

| Jurisdiction         | Total New Units |                     | Change if Using Housing Share |
|----------------------|-----------------|---------------------|-------------------------------|
|                      | Using Pop Share | Using Housing Share |                               |
| Unincorporated Rural | 3,534           | 6,195               | Higher                        |
| Unincorporated UGA   | 22,946          | 17,142              | Lower                         |
| Airway Heights       | 5,007           | 3,955               | Lower                         |
| Cheney               | 2,535           | 2,076               | Lower                         |
| Deer Park            | 1,023           | 1,083               | Higher                        |
| Fairfield            | 0               | 0                   | Higher                        |
| Latah                | 0               | 0                   | Higher                        |
| Liberty Lake         | 6,601           | 5,180               | Lower                         |
| Medical Lake         | 179             | 329                 | Higher                        |
| Millwood             | 36              | 106                 | Higher                        |
| Rockford             | 53              | 68                  | Higher                        |
| Spangle              | 0               | 15                  | Higher                        |
| Spokane              | 17,550          | 22,359              | Higher                        |
| Spokane Valley       | 15,713          | 16,661              | Higher                        |
| Waverly              | 7               | 15                  | Higher                        |

While the allocation for unincorporated rural areas would be more than 3/4 larger, that increase would be spread throughout a very large area (all parts of the County outside the UGA), tempering the effects of that growth somewhat. Furthermore, urban scale services to those additional homes would not be required due to their location.

### PTAC Recommendations: Housing Share and HAPT

Following multiple discussions on the differences between population share and housing share, PTAC generally feels that housing share, created using the same assumptions already built into the HAPT, is the most defensible and effective input for the HAPT. The following benefits of using housing share discussed were as follows:

- The assumptions used to generate housing share from population share are identical to those in the HAPT now.
- The HAPT model is sophisticated—an adjustment in one variable can have unintended consequences.
- The data used to generate housing share have already been considered and adopted by the BOCC.

## Final Results

If the share of housing growth indicated in Table 1 is input into the HAPT, and the method previously described as Method A Prime in the SCEO recommendation is utilized, then the final housing allocation shown in the attached spreadsheet is provided.

| Spokane County                                 | Permanent Housing Needs by Income Level (% of Area Median Income) |         |       |         |         |          |           |        | Emergency Housing Needs (Temporary) |
|--|---|---------|-------|---------|---------|----------|-----------|--------|-------------------------------------|
|  | Total   | 0-30%   |       | >30-50% | >50-80% | >80-100% | >100-120% | >120%  |                                     |
|  |   | Non-PSH | PSH   |         |         |          |           |        |                                     |
|  |   |         |       |         |         |          |           |        |                                     |
| Countywide Estimated Housing Supply (2020)     | 221,840   | 6,613   | 937   | 34,798  | 91,803  | 32,035   | 20,981    | 34,673 | 1,192                               |
| Countywide Total Housing Needs (2046)          | 297,024   | 26,518  | 6,651 | 48,418  | 100,647 | 36,807   | 24,918    | 53,065 | 4,229                               |
| Countywide Additional Units Needed (2020-2046) | 75,184  | 19,905  | 5,714 | 13,620  | 8,844   | 4,772    | 3,937     | 18,392 | 3,037                               |

68.09%

← Minimum allocation to urban areas (cumulatively) to accommodate needs at all affordability levels. This varies by county and population target.

91.77%

← Urban area combined % allocation from user inputs

|                       |                              | User Input - % Share of Countywide Housing Growth. Values must sum to 100% | HOUSING ALLOCATION FROM SELECTED SHARES |   |       |         |         |          |           |        |       | Emergency Housing Needs (Temporary) * |
|-----------------------|------------------------------|--|---|---|-------|---------|---------|----------|-----------|--------|-------|---------------------------------------|
|                       |                              |  | Total Units Allocated (2020-2046)       | Permanent Housing Needs by Income Level (% of Area Median Income) |       |         |         |          |           |        |       |                                       |
|                       |                              |  |   | 0-30%   |       | >30-50% | >50-80% | >80-100% | >100-120% | >120%  |       |                                       |
| User Input            |                              |  |   | Non-PSH   | PSH   |         |         |          |           |        |       |                                       |
| Unincorporated County | Existing Combined (Estimate) | -  | 59,013                                  | 1,179   | 0     | 5,981   | 14,559  | 9,421    | 9,603     | 18,270 | 30    |                                       |
|                       | Future Inside UGA            | 22.81  | 17,149                                  | 4,948   | 1,420 | 3,385   | 2,017   | 1,088    | 898       | 3,393  | 755   |                                       |
|                       | Future Outside UGA           | 8.23   | 6,188                                   | 0   | 0     | 0       | 728     | 393      | 324       | 4,743  | 0     |                                       |
| Airway Heights        | Existing (Estimate)          | 5.26   | 3,626                                   | 67  | 0     | 685     | 1,997   | 545      | 134       | 198    | 0     |                                       |
|                       | Future Allocation            |  | 3,955                                   | 1,141   | 328   | 781     | 465     | 251      | 207       | 782    | 174   |                                       |
| Cheney                | Existing (Estimate)          | 2.76   | 5,354                                   | 256   | 0     | 935     | 3,097   | 690      | 153       | 223    | 0     |                                       |
|                       | Future Allocation            |  | 2,076                                   | 599   | 172   | 410     | 244     | 132      | 109       | 410    | 91    |                                       |
| Deer Park             | Existing (Estimate)          | 1.44   | 1,902                                   | 45  | 0     | 434     | 804     | 275      | 99        | 245    | 0     |                                       |
|                       | Future Allocation            |  | 1,083                                   | 312   | 90    | 214     | 127     | 69       | 57        | 214    | 48    |                                       |
| Fairfield             | Existing (Estimate)          | 0.00   | 228                                     | 5   | 0     | 79      | 104     | 23       | 5         | 12     | 0     |                                       |
|                       | Future Allocation            |  | 0                                       | 0   | 0     | 0       | 0       | 0        | 0         | 0      | 0     |                                       |
| Latah                 | Existing (Estimate)          | 0.00   | 88                                      | 0   | 0     | 35      | 41      | 6        | 2         | 4      | 0     |                                       |
|                       | Future Allocation            |  | 0                                       | 0   | 0     | 0       | 0       | 0        | 0         | 0      | 0     |                                       |
| Liberty Lake          | Existing (Estimate)          | 6.89   | 4,915                                   | 39  | 0     | 208     | 1,133   | 1,238    | 930       | 1,367  | 0     |                                       |
|                       | Future Allocation            |  | 5,180                                   | 1,494   | 429   | 1,023   | 609     | 329      | 271       | 1,025  | 228   |                                       |
| Medical Lake          | Existing (Estimate)          | 0.44   | 1,828                                   | 184   | 0     | 159     | 839     | 329      | 96        | 221    | 0     |                                       |
|                       | Future Allocation            |  | 329                                     | 95  | 27    | 65      | 39      | 21       | 17        | 65     | 15    |                                       |
| Millwood              | Existing (Estimate)          | 0.14   | 820                                     | 27  | 0     | 147     | 413     | 142      | 37        | 54     | 0     |                                       |
|                       | Future Allocation            |  | 106                                     | 30  | 9     | 21      | 12      | 7        | 6         | 21     | 5     |                                       |
| Rockford              | Existing (Estimate)          | 0.09   | 195                                     | 0   | 0     | 62      | 85      | 25       | 7         | 16     | 0     |                                       |
|                       | Future Allocation            |  | 68                                      | 20  | 6     | 13      | 8       | 4        | 4         | 13     | 3     |                                       |
| Spangle               | Existing (Estimate)          | 0.02   | 127                                     | 6   | 0     | 42      | 56      | 12       | 3         | 8      | 0     |                                       |
|                       | Future Allocation            |  | 15                                      | 4   | 1     | 3       | 2       | 1        | 1         | 3      | 1     |                                       |
| Spokane               | Existing (Estimate)          | 29.74  | 99,938                                  | 3,534   | 937   | 19,479  | 47,090  | 11,873   | 7,118     | 9,907  | 1,134 |                                       |
|                       | Future Allocation            |  | 22,359                                  | 6,452   | 1,851 | 4,413   | 2,631   | 1,418    | 1,170     | 4,424  | 983   |                                       |
| Spokane Valley        | Existing (Estimate)          | 22.16  | 43,751                                  | 1,265   | 0     | 6,515   | 21,579  | 7,456    | 2,792     | 4,144  | 0     |                                       |
|                       | Future Allocation            |  | 16,661                                  | 4,806   | 1,380 | 3,289   | 1,960   | 1,058    | 872       | 3,296  | 733   |                                       |
| Waverly               | Existing (Estimate)          | 0.02   | 55                                      | 6   | 0     | 37      | 6       | 0        | 2         | 4      | 0     |                                       |
|                       | Future Allocation            |  | 15                                      | 4   | 1     | 3       | 2       | 1        | 1         | 3      | 1     |                                       |





## **Appendix B: Assembled Affordability by SubArea from Public Market Data Sources**

*Appendix to Accommodating Affordable Housing in the City of Spokane, 2025*

## Affordability Data by Subarea - Purchase Costs

### Home Prices

*from fanniemae mortgage calculator*

| Source: Zillow | Subarea                   | Median Value | Mortgage Payment | Income Required | Bracket    |
|----------------|---------------------------|--------------|------------------|-----------------|------------|
|                | Balboa-South Indian Trail | \$424,754    | \$3,635          | \$145,400       | 120+%AMI   |
|                | Bemiss                    | \$280,200    | \$2,398          | \$95,920        | 80-100%AMI |
|                | Browne's Addition         | \$354,056    | \$3,031          | \$121,240       | 120+%AMI   |
|                | Chief Garry Park          | \$268,467    | \$2,298          | \$91,920        | 80-100%AMI |
|                | Cliff-Cannon              | \$405,652    | \$3,473          | \$138,920       | 120+%AMI   |
|                | Comstock                  | \$448,209    | \$3,836          | \$153,440       | 120+%AMI   |
|                | East Central              | \$307,951    | \$2,636          | \$105,440       | 80-100%AMI |
|                | Emerson-Garfield          | \$292,084    | \$2,500          | \$100,000       | 80-100%AMI |
|                | Five Mile-Prairie         | \$565,299    | \$4,839          | \$193,560       | 120+%AMI   |
|                | Hillyard                  | \$280,517    | \$2,401          | \$96,040        | 80-100%AMI |
|                | Latah Valley              | \$566,119    | \$4,846          | \$193,840       | 120+%AMI   |
|                | Lincoln Heights           | \$391,469    | \$3,351          | \$134,040       | 120+%AMI   |
|                | Logan                     | \$303,672    | \$2,599          | \$103,960       | 80-100%AMI |
|                | Manito-Cannon Hill        | \$535,315    | \$4,582          | \$183,280       | 120+%AMI   |
|                | Minnehaha                 | \$314,370    | \$2,690          | \$107,600       | 80-100%AMI |
|                | Moran Prairie             | \$494,428    | \$4,232          | \$169,280       | 120+%AMI   |
|                | Nevada-Lidgerwood         | \$299,131    | \$2,560          | \$102,400       | 80-100%AMI |
|                | North Hill                | \$310,829    | \$2,661          | \$106,440       | 80-100%AMI |
|                | North Indian Trail        | \$496,470    | \$4,249          | \$169,960       | 120+%AMI   |
|                | Northwest                 | \$346,592    | \$2,966          | \$118,640       | 120+%AMI   |
|                | Peaceful Valley           | \$329,062    | \$2,817          | \$112,680       | 120+%AMI   |
|                | Riverside                 | \$400,099    | \$3,424          | \$136,960       | 120+%AMI   |
|                | Rockwood                  | \$619,562    | \$5,303          | \$212,120       | 120+%AMI   |
|                | Thorpe-Westwood           | \$442,224    | \$3,785          | \$151,400       | 120+%AMI   |
|                | West Central              | \$299,526    | \$2,563          | \$102,520       | 80-100%AMI |
|                | West Hills                | \$405,951    | \$3,475          | \$139,000       | 120+%AMI   |
|                | Whitman                   | \$280,856    | \$2,404          | \$96,160        | 80-100%AMI |

### Home Prices

*from fanniemae mortgage calculator*

| Source: Redfin | Subarea                   | Median Value | Mortgage Payment | Income Required | Bracket    |
|----------------|---------------------------|--------------|------------------|-----------------|------------|
|                | Balboa-South Indian Trail | \$382,450    | \$3,274          | \$130,960       | 120+%AMI   |
|                | Bemiss                    | \$295,750    | \$2,532          | \$101,280       | 80-100%AMI |
|                | Browne's Addition         | \$310,000    | \$2,654          | \$106,160       | 80-100%AMI |
|                | Chief Garry Park          | \$296,956    | \$2,542          | \$101,680       | 80-100%AMI |
|                | Cliff-Cannon              | \$430,000    | \$3,681          | \$147,240       | 120+%AMI   |
|                | Comstock                  | \$435,475    | \$3,728          | \$149,120       | 120+%AMI   |
|                | East Central              | \$300,000    | \$2,568          | \$102,720       | 80-100%AMI |
|                | Emerson-Garfield          | \$302,500    | \$2,589          | \$103,560       | 80-100%AMI |
|                | Five Mile-Prairie         | \$565,530    | \$4,841          | \$193,640       | 120+%AMI   |
|                | Grandview Thorpe          | \$463,000    | \$3,962          | \$158,480       | 120+%AMI   |
|                | Hillyard                  | \$285,000    | \$2,439          | \$97,560        | 80-100%AMI |
|                | Latah Valley              | \$574,950    | \$4,921          | \$196,840       | 120+%AMI   |
|                | Lincoln Heights           | \$403,000    | \$3,449          | \$137,960       | 120+%AMI   |
|                | Logan                     | \$318,000    | \$2,722          | \$108,880       | 120+%AMI   |
|                | Manito-Cannon Hill        | \$540,000    | \$4,622          | \$184,880       | 120+%AMI   |
|                | Minnehaha                 | \$330,000    | \$2,825          | \$113,000       | 120+%AMI   |
|                | Moran Prairie             | \$634,656    | \$5,432          | \$217,280       | 120+%AMI   |
|                | Nevada-Lidgerwood         | \$302,000    | \$2,585          | \$103,400       | 80-100%AMI |
|                | North Hill                | \$305,000    | \$2,611          | \$104,440       | 80-100%AMI |
|                | North Side                | \$335,000    | \$2,868          | \$114,720       | 120+%AMI   |
|                | Northwest Spokane         | \$340,000    | \$2,910          | \$116,400       | 120+%AMI   |
|                | Peaceful Valley           | \$310,000    | \$2,654          | \$106,160       | 80-100%AMI |
|                | Riverside                 | \$460,000    | \$3,937          | \$157,480       | 120+%AMI   |
|                | Rockwood                  | \$635,000    | \$5,435          | \$217,400       | 120+%AMI   |
|                | West Central              | \$280,500    | \$2,400          | \$96,000        | 80-100%AMI |
|                | West Hills                | \$415,000    | \$3,552          | \$142,080       | 120+%AMI   |
|                | Whitman                   | \$291,000    | \$2,491          | \$99,640        | 80-100%AMI |

NOTE: The subareas above do not necessarily correspond to Spokane Neighborhood Council boundaries.

## Affordability Data by Subarea - Rental Costs

### Rental Costs

Source: RentCafe

| Subarea                     | Average Rent<br>(May 2025) | Income<br>Required | Bracket    |
|-----------------------------|----------------------------|--------------------|------------|
| Balboa - South Indian Trail | \$1,330                    | \$53,200           | 0-80%AMI   |
| Bemiss                      | \$1,442                    | \$57,680           | 0-80%AMI   |
| Browne's Addition           | \$1,546                    | \$61,840           | 0-80%AMI   |
| Chief Garry Park            | \$1,426                    | \$57,040           | 0-80%AMI   |
| Cliff - Cannon              | \$1,441                    | \$57,640           | 0-80%AMI   |
| Comstock                    | \$1,373                    | \$54,920           | 0-80%AMI   |
| East Central Spokane        | \$1,345                    | \$53,800           | 0-80%AMI   |
| Emerson - Garfield          | \$1,521                    | \$60,840           | 0-80%AMI   |
| Five Mile Prairie           | \$1,328                    | \$53,120           | 0-80%AMI   |
| Grandview - Thorpe          | \$1,540                    | \$61,600           | 0-80%AMI   |
| Hillyard                    | \$1,366                    | \$54,640           | 0-80%AMI   |
| Latah Valley                | \$1,467                    | \$58,680           | 0-80%AMI   |
| Lincoln Heights             | \$1,149                    | \$45,960           | 0-80%AMI   |
| Logan                       | \$2,009                    | \$80,360           | 80-120%AMI |
| Manito - Cannon Hill        | \$1,139                    | \$45,560           | 0-80%AMI   |
| Minnehaha                   | \$1,366                    | \$54,640           | 0-80%AMI   |
| Moran Prairie               | \$1,329                    | \$53,160           | 0-80%AMI   |
| Nevada - Lidgerwood         | \$1,237                    | \$49,480           | 0-80%AMI   |
| North Hill                  | \$1,072                    | \$42,880           | 0-80%AMI   |
| North Indian Trail          | \$1,759                    | \$70,360           | 80-120%AMI |
| Northwest Spokane           | \$1,382                    | \$55,280           | 0-80%AMI   |
| Peaceful Valley             | \$1,546                    | \$61,840           | 0-80%AMI   |
| Riverside                   | \$1,466                    | \$58,640           | 0-80%AMI   |
| Rockwood                    | \$1,139                    | \$45,560           | 0-80%AMI   |
| Southgate                   | \$1,529                    | \$61,160           | 0-80%AMI   |
| West Central Spokane        | \$1,546                    | \$61,840           | 0-80%AMI   |
| West Hills                  | \$1,425                    | \$57,000           | 0-80%AMI   |
| West Meadows                | \$1,277                    | \$51,080           | 0-80%AMI   |
| Whitman                     | \$1,335                    | \$53,400           | 0-80%AMI   |

### Rental Costs

Source: Apartments.com

| Subarea           | Average Rent<br>(May 2025) | Income<br>Required | Bracket    |
|-------------------|----------------------------|--------------------|------------|
| Bemiss            | \$1,202                    | \$48,080           | 0-80%AMI   |
| Chief Garry Park  | \$1,555                    | \$62,200           | 0-80%AMI   |
| City Center       | \$1,460                    | \$58,400           | 0-80%AMI   |
| Cliff Cannon      | \$1,359                    | \$54,360           | 0-80%AMI   |
| Comstock          | \$1,330                    | \$53,200           | 0-80%AMI   |
| Dartford          | \$1,394                    | \$55,760           | 0-80%AMI   |
| Downtown          | \$1,410                    | \$56,400           | 0-80%AMI   |
| Emerson Garfield  | \$1,374                    | \$54,960           | 0-80%AMI   |
| Lincoln Heights   | \$1,127                    | \$45,080           | 0-80%AMI   |
| Logan             | \$1,360                    | \$54,400           | 0-80%AMI   |
| Moran Prairie     | \$1,380                    | \$55,200           | 0-80%AMI   |
| Nevada Lidgerwood | \$1,202                    | \$48,080           | 0-80%AMI   |
| North Spokane     | \$1,311                    | \$52,440           | 0-80%AMI   |
| Palisades Park    | \$1,282                    | \$51,280           | 0-80%AMI   |
| Rockwood          | \$1,157                    | \$46,280           | 0-80%AMI   |
| South Spokane     | \$1,265                    | \$50,600           | 0-80%AMI   |
| Town and Country  | \$1,369                    | \$54,760           | 0-80%AMI   |
| U-District        | \$1,659                    | \$66,360           | 80-120%AMI |
| West Central      | \$1,326                    | \$53,040           | 0-80%AMI   |
| West Spokane      | \$1,274                    | \$50,960           | 0-80%AMI   |

NOTE: The subareas above do not necessarily correspond to Spokane Neighborhood Council boundaries.



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