

**Spokane City Plan Commission  
Findings of Fact, Conclusions, and Recommendation**

**Proposed Adoption of SMC 17D.100.285, Cannon Hill Park Local Historic District  
Overlay Zone and Design Standards and Guidelines**

A recommendation from the City Plan Commission to the City Council to approve the adoption of SMC 17D.100.285, Cannon Hill Park Local Historic District Overlay Zone and Design Standards and Guidelines. The proposal is related to the request from the Cannon Hill Park property owners requesting the formation of a local historic district in the Manito/Cannon Hill Neighborhood, which would include the approval of the historic district formation through a balloting process and the legislative action to approve an overlay zone.

**Findings of Fact:**

- A. The City of Spokane's Comprehensive Plan 1) encourages the recognition and preservation of unique or outstanding landmark structures, buildings, and sites." (Goal DP 1.1), 2) establishes historic preservation as a high priority within city programs (Goal DP 3.1), 3) supports the identification of historic resources to guide decision making in planning" (Goal DP 3.3) and 4) seeks to maintain and utilize the expertise of the Landmarks Commission in decision making by the City Council, City Plan Commission, City Parks Board, and other city agencies in matters of historic preservation. (Goal DP 3.5).
- B. The Comprehensive Plan also supports design guidelines and criteria for sub-areas and historic districts that are based on local community participation and the particular character and development issues of each subarea or historic district. (Goal DP 2.7).
- C. To accomplish this, the City's Comprehensive Plan states as a goal to "provide incentives to property owners to encourage historic preservation" (Goal DP 3.9) and assist and cooperate with owners of historic properties to identify, recognize, and plan for the use of their property to ensure compatibility with preservation objectives (Goal DP 3.11) as well as encourage the deconstruction and reuse of historic materials and features when historic buildings are demolished. (Goal DP 3.12).
- D. The City's Comprehensive Plan recognizes our neighborhoods as one of our City's finest assets, and supports assistance to neighborhoods and other potential historic districts to identify, recognize, and highlight their social and economic origins and promote the preservation of their historic heritage, cultural resources, and built environment. (Goal DP 3.13).
- E. The City Council adopted Ordinance No. C-35580 on February 12, 2018 whereby the City Council recodified the City's Historic Preservation Ordinance. Part of that recodification included the process for the formation of local historic districts.

- F. Several property owners contacted the Spokane Historic Preservation Office in the fall of 2024 requesting that a local historic district be formed in the neighborhood; and
- G. The Cannon Hill Park property owners and the Spokane City|County Historic Preservation Office conducted outreach efforts including presentations, two Plan Commission briefings/workshops, neighborhood workshops, created websites with additional information, mailings, and direct feedback from property owners through neighbor-to-neighbor conversations; and
- H. After conducting extensive historic research and engaging the community for input and feedback, a Cannon Hill Park Local Historic District Nomination document, Cannon Hill Park Local Historic District Resource Forms, and Cannon Hill Park Local Historic District Design Standards and Guidelines have been developed for adoption of the district to the Spokane Register of Historic Places and for the formation of the Cannon Hill Park Local Historic District Overlay Zone; and
- I. The adoption of the Cannon Hill Park Local Historic District Overlay Zone and Design Standards and Guidelines would be the final step in the formation of this local historic district.
- J. On March 12 and July 23, 2025, Spokane City Plan Commission held a briefing and a workshop to study the proposed ordinance, the formation of the Cannon Hill Park Local Historic District, and the adoption of the Design Standards and Guidelines. Plan Commission voted to advance the proposal to hearing on September 24, 2025.
- K. On June 23, 2025, a SEPA sign was posted in Cannon Hill Park informing neighbors of the proposal as well as the August 20 hearing of the Spokane Historic Landmarks Commission meeting.
- L. On July 3, 2025, a SEPA Checklist and Request for Comments was emailed to agencies. Comments were due by July 18, 2025.
- M. On August 15, 2025, pursuant to RCW 36.70A.106, the City notified the Washington State Department of Commerce of its intent to adopt this proposed ordinance. On August 18, 2025, the City received an acknowledgement letter from the Department of Commerce.
- N. Two public workshops were held on February 26, 2025 and April 23, 2025, and amongst regular check-ins with the project proponents.
- O. As required by SMC 17D.100.030, a vote of the property owners within the district boundaries was conducted to determine support for the district. 191 ballots with 193 votes (1 vote per developable parcel within the boundary) were sent via USPS on May 8, 2025. 154 votes (80% return rate) were returned by the deadline on August 18, 2025. The HPO received 135 “YES” votes to form the district, 17 “NO” votes were received; 2 “NEUTRAL” votes (ultimately counted as NO votes) and 39 votes were not returned to the HPO office. Turnout was 80%. Of those who returned ballots, 88% were in favor of forming the district, and once the non-returned votes are accounted for, 70% of the TOTAL owners of properties within

the district boundaries were in favor, which exceeded the 50% +1 required by city ordinance (97 “YES” votes minimum).

- P. The City caused notice of the proposed ordinance and announcement of the Plan Commission's September 24, 2025 hearing to be published in the Spokesman Review on August 28, 2025 and again on September 17, 2025.
- Q. On August 27, 2025, the responsible official issued a State Environmental Policy Act (SEPA) Checklist and Determination of Non-Significance for the proposed ordinance. The public comment period for the SEPA determination ended on September 12, 2025, at 5:00 pm. No public comments were received.
- R. On August 28, 2025, the Historic Preservation Office mailed a Notice of Plan Commission Hearing and SEPA Determination to all property owners in the proposed boundary of the Cannon Hill Park Historic District Overlay with information about the hearing on the overlay zone.
- S. On September 24, 2025, the City Plan Commission held a public hearing on the proposed ordinance; public testimony was taken.

**Public Comment:**

- A. During the hearing on September 24, 2025, the Plan Commission heard testimony from three individuals: all three were in favor of the proposed ordinance including the recommendation for the formation of the historic district and adoption of the design standards and guidelines.
- B. No other testimony was submitted.

**Plan Commission Deliberations:**

- A. During deliberations, the Plan Commission considered the proposed ordinance relating to the adoption of the Cannon Hill Park Local Historic District Overlay Zone and Design Standards and Guidelines.
- B. While supportive of the present application, the Plan Commission expressed concern about the use of historic districts to prevent future development.
- C. The Plan Commission desired for future historic districts to be guided by a city-wide historic preservation plan which should include consideration for future growth needs, inequities in the resources needed to create a historic district, and priorities for future preservation. There appeared to be support among some Plan Commission members to recommend the City Council institute a pause on new historic district formation until this plan can be completed.
- D. The Plan Commission concluded that the proposed ordinance, including the proposed formation of the Cannon Hill Park Local Historic District Overlay Zone and adoption of the design standards and guidelines (SMC 17D.100.290) was consistent with (i) Chapter 17D.100 SMC, (ii) applicable provisions of the

Comprehensive Plan, and (iii) bears a substantial relation to public health, safety, welfare, and protection of the environment.

- E. The Plan Commission hereby incorporates and adopts the contents of the Staff Report in support of these findings and recommendations.

**Conclusions:**

The proposed adoption of SMC 17D.100.285, Cannon Hill Park Local Historic District Overlay Zone and Design Standards and Guidelines is fully consistent with applicable provisions of the City of Spokane Comprehensive Plan and bears a substantial relation to the public health, safety, welfare, and protection of the environment.

The City would benefit from a city-wide historic preservation plan to guide decision making about future historic districts, and may further benefit by pausing new district formation until such a plan is completed.

**Recommendation:**

By a vote of 7-1, the Plan Commission recommends that the City Council adopt the proposed ordinance relating to the adoption of SMC 17D.100.285 regarding the Cannon Hill Park Local Historic District Overlay Zone and Design Standards and Guidelines.

*Jesse Bank*

Jesse Bank (Oct 6, 2025 11:22:48 PDT)

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Jesse Bank, President

Spokane Plan Commission

October 3, 2025







# Cannon Hill Park LHD PC Findings unsigned 10.03.25

Final Audit Report

2025-10-06

Created:	2025-10-03
By:	Angela McCall (amccall@spokanecity.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAFo8jEykJDyaDob5gYVBaY79_dXCxoGP8P

## "Cannon Hill Park LHD PC Findings unsigned 10.03.25" History

-  Document created by Angela McCall (amccall@spokanecity.org)  
2025-10-03 - 3:34:30 PM GMT
-  Document emailed to Jesse Bank (jbank@spokanecity.org) for signature  
2025-10-03 - 3:34:35 PM GMT
-  Email sent to bdsadmin@spokanecity.org bounced and could not be delivered  
2025-10-03 - 3:38:47 PM GMT
-  Email viewed by Jesse Bank (jbank@spokanecity.org)  
2025-10-06 - 6:22:03 PM GMT
-  Document e-signed by Jesse Bank (jbank@spokanecity.org)  
Signature Date: 2025-10-06 - 6:22:48 PM GMT - Time Source: server
-  Agreement completed.  
2025-10-06 - 6:22:48 PM GMT