Spokane Climate Policy Audit

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The WA Department of Commerce climate planning grant is supported with funding from Washington's Climate Commitment Act. The CCA supports Washington's climate action efforts by putting cap-and-invest dollars to work reducing climate pollution, creating jobs, and improving public health. Information about the CCA is available at www.climate.wa.gov.



1 Summary

1.1 Purpose and Approach

Spokane seeks to incorporate Washington State
Department of Commerce's climate planning guidance
into the periodic update of the Comprehensive Plan and
audit its policies and codes for consistency with state
laws, particularly HB 1181 which created a new Climate
Change and Resilience Element under the Growth
Management Act (GMA) (RCW 36.70A.070(9)). By auditing
and summarizing existing climate-related City plans,
policies, and regulations the City can lay a strong
planning foundation for the new climate element
requirements. The consultant team prepared this audit,
which identifies policies and codes to keep, amend, add,
consolidate/combine, or incorporate into the
Comprehensive Plan.

The consultant team initially reviewed approximately 1,325 policies, strategies, or code sections from the Spokane Comprehensive Plan, Spokane Shoreline Master Program, Spokane Parks Master Plan, Spokane Municipal Code (SMC). 327, and City Council's Spokane Sustainability Action Plan of the policies, strategies, or code sections were selected for a deeper review with recommendations for each as to whether it should be kept as is, combined with other policies, amended, or supplemented by adding a new measure.

Policies reviewed for this audit were evaluated through the lenses of **resilience**, **equity**, **or greenhouse gas** (**GHG**) **reduction**, then graded by quality.

 Low Quality = loose connection to climate considerations/nothing enforceable or implementable

Key Terms

Based on Commerce Climate Element Planning Guidance, <u>US Climate</u> Toolkit, <u>RCW 70A.65.010</u>

Climate Resilience: The ongoing process of anticipating, preparing for, and adapting to changes in climate and minimizing negative impacts to our natural systems, infrastructure, and communities.

Equity: In the context of this policy review, considers how well policies address the reduction of climate impacts that affect the environment and health of vulnerable communities also called overburdened communities per RCW 19.405.020.

Greenhouse Gas Reduction:

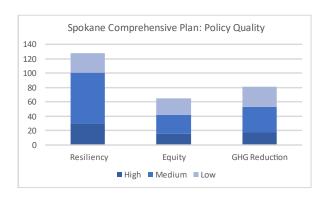
Actions taken to reduce or eliminate the emissions of greenhouse gases (present and future) in order to reduce the rate and extent of climate hazards. It may also be referred to as greenhouse gas emissions GHG reduction.

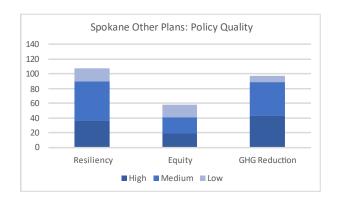


- Medium Quality = some climate considerations that are actionable
- High Quality = addresses climate risk and strategies well

This analysis showed there are more Comprehensive Plan policies that directly or indirectly address climate resiliency than address GHG reduction or equity. Other plans reviewed also had more resiliency-related and GHG reduction related measures; theses other plans had a similar amount of equity measures as the Comprehensive Plan.

Exhibit 1. Resiliency, Equity, and GHG Related Policy Quality





Source: BERK Consulting, Cascadia Consulting Group, Fehr & Peers, 2024.

Policy quality is generally higher in the Spokane Parks Master Plan, and Climate Change Code (SMC Chapter 15.05) and City Council's Sustainability Action Plan, than the Spokane Comprehensive Plan, which is unsurprising as these plans or document were developed more recently and were written with climate mitigation and adaptation in mind. As such, there is an opportunity to bring higher quality climate policies into the Spokane Comprehensive Plan.

1.2 Top Findings

1.2.1 Plan Format

Spokane intends to integrate climate goals and policies in each element of its Comprehensive Plan to meet the HB 1181 requirements regarding:

- Greenhouse gas emissions reduction
- Resiliency



In addition, the City will meet other HB 1181 requirements to provide for: environmental justice in its land use element; green infrastructure and tree canopy assessments in its capital facilities, utilities, and parks elements; and active transportation in its transportation element. New or amended climate goals and policies will be tailored for inclusion in Spokane's Comprehensive Plan with its 14 chapters. To ensure goals and policies address a full range of potential climate impacts, this memo reviews Spokane's Comprehensive Plan with respect to 11 sectors addressing various economic, social, environmental, infrastructure, or public services. (See sidebar.) These sectors are included in the Department of Commerce's Climate Element Planning Guidance (December 2023).

Plan Goals and Policies to **Strengthen**

The Spokane Comprehensive Plan contains more policies regarding **Zoning and** Development, Transportation, and **Ecosystems** than other sectors evaluated. In all sectors there are **opportunities to bolster**

climate mitigation and resilience.

climate and environmental justice, particularly in prioritizing investments for overburdened communities in green infrastructure/tree canopy, capital facilities and services, commercial and housing incentives, and reduction in air pollution exposure.

There are fewer Spokane Comprehensive Plan policies in the following sectors. To strengthen the Spokane Comprehensive Plan the City could consider adding new policies or bringing in policies or strategies from other plans, such as the City Council's Spokane Sustainability Action Plan (SSAP) and Spokane Parks and Natural Lands Master Plan:

- **Agriculture and Food System:** Current policies in the Comprehensive Plan are limited but of high quality. Some strategies in the City Council's SSAP could be incorporated.
- **Buildings and Energy:** Policies in the Spokane Comprehensive Plan address energy conservation for utilities and housing, cost/benefits for capital facilities, and undergrounding utilities. While there are limited Comprehensive Plan goals and policies

Climate Sectors

The Department of Commerce Climate Element Planning Guidance, December 2023, recommends jurisdictions address 11 sectors in the development of climate related goals and policies. Sectors are distinct categories of economic, social, environmental, infrastructure, or public services.

- Agriculture & Food Systems
- **Buildings & Energy**
- **Cultural Resources & Practices**
- **Economic Development**
- **Ecosystems**
- **Emergency Management**
- Health & Well-being
- Transportation
- Waste Management
- Water Resources
- Zoning & Development

The sectors are not equivalent to GMA Comprehensive Plan chapters. Commerce recognizes each jurisdiction has freedom to prepare a single chapter addressing

around buildings and energy, there are more than 20 goals, policies, or strategies in other plans that could bolster the Comprehensive Plan policies.

- Cultural Resources: Limited Spokane Comprehensive Plan policies address cultural resources from a resilience or equity perspective. It is a gap area that could be addressed in the policy development phase. Some policies in the Ecosystems and Water Systems sectors provide cross-sector concepts of protecting and enhancing traditional foods and medicines.
- **Emergency Management:** The City Council's SSAP and the Spokane Parks Master Plan are sources to bolster policies on climate hazards (e.g., wildfire, flooding) and emergency management.
- Waste Management: There are few Waste Management policies in the Spokane Comprehensive Plan, and the City Council's SSAP provides some opportunities to integrate more detailed approaches such as composting and food waste.
- Water Resources: There is an opportunity to update and consolidate policies and strategies, especially regarding groundwater conservation and considering changing climate trends in stormwater system management.

Exhibit 2 summarizes the policy strengths and weaknesses by Spokane's Comprehensive Plan element/chapters. Most elements have moderate or strong resiliency related policies, but some could use some bolstering where weak or limited.

Exhibit 2. Comprehensive Plan Element Report Card – Strength of Existing Policies

ELEMENTS	Resiliency	Equity	GHG
Land Use	Moderate	Weak	Moderate
Transportation	Moderate	Limited	Moderate
Capital Facilities and Utilities	Moderate	Limited	Limited
Housing	Moderate	Weak	Limited
Economic Development	Limited	Limited	Limited
Urban Design and Historic Preservation	Weak	Weak	Limited
Natural Environment	Strong	Weak	Moderate
Shorelines	Strong	Weak	Weak
Social Health	Limited	Limited	Limited
Neighborhoods	Moderate	Moderate	Moderate
Parks and Recreation	Limited	Limited	Limited
Local Governance and Citizenship	Weak	Limited	Weak

Strong: Several policies address climate risk and resilience/equity/GHG mitigation priorities well **Moderate:** Some climate resilience/equity/GHG mitigation addressed with some strategies **Limited:** Few climate considerations regarding resilience/equity/GHG mitigation addressed **Weak:** No or minimal resilience/equity/GHG mitigation addressed



1.3 Next Steps

After completion of this document and a detailed policy matrix, draft policies will be prepared for review by advisory bodies and the public and tribes. Eventually Spokane's climate related goals and policies would be integrated into the Spokane Comprehensive Plan Periodic Update due in 2026.

2 Policy Audit

A new goal of the Growth Management Act (GMA) addresses a changing climate and adaptation as well as environmental justice:

Climate change and resiliency. Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and chapter 47.80 RCW adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice. (RCW 36.70A.020(14))

The GMA also requires a new Climate Change and Resiliency Element, which must address a greenhouse gas (GHG) emissions reduction subelement (mitigation) and a climate resilience (adaptation) sub-element. (RCW 36.70a.070 (9)) The format of the element is flexible and can be a separate chapter of the plan, or climate goals and policies can be built into existing elements. Spokane intends to integrate climate into its existing 14 chapters of the Spokane Comprehensive Plan.

In 2023, Washington Department of Commerce developed climate element planning guidance including a workbook meant to identify climate impacts, assets, and policy strength to address climate policies across 11 sectors. (See Sidebar on page 1-3.) By 2031, five years after Spokane's Comprehensive Plan Periodic Update deadline in 2026, the City must prepare a progress report regarding housing element implementation and affordability, permit timelines, and actions to

Definitions based on the <u>US Climate</u> <u>Toolkit</u> and <u>RCW 70A.65.010</u>

Climate Resilience: The ongoing process of anticipating, preparing for, and adapting to changes in climate and minimizing negative impacts to our natural systems, infrastructure, and communities.

Adaptation: The process of adjusting to new (climate) conditions in order to reduce risks to valued assets.

Mitigation: Processes that can reduce the amount and speed of future changes to climate by reducing emissions of heat-trapping gases or removing them from the atmosphere.

achieve greenhouse gas emissions reductions and vehicle miles travelled (RCW 36.70a.130 (9)(a)). This audit identifies policies and codes to keep, amend, add, or incorporate into the Comprehensive Plan.



Commerce recommends reviewing 3-5 plans and at a minimum reviewing the Spokane Comprehensive Plan and Spokane Shoreline Master Program as well as a hazard mitigation plan. Spokane does not have a hazard mitigation plan at this time but is part of a regional process that is in progress. Plans and codes reviewed in the audit workbook include:

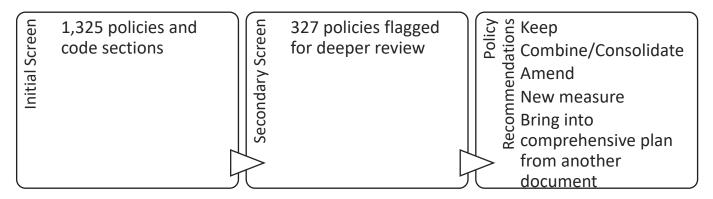
- Spokane <u>Comprehensive Plan</u>
- Spokane Shoreline Master Program (Comprehensive Plan Chapter 14)
- City Council's Sustainability Action Plan
- Spokane Parks and Natural Lands <u>Master Plan</u>
- Spokane Municipal Code <u>15.05</u> Climate Change

The consultant team followed a tiered review process. The consultant team initially reviewed 1,325 policies and code sections. The primary review considered whether the policy or code:

- Directly or indirectly addresses climate mitigation, adaptation, or environmental justice
- Could interfere or limit effectiveness of climate mitigation or adaptation or environmental justice
- Emphasizes key hazards and/or greenhouse gas reduction opportunities
- Emphasizes climate equity

327 were selected for a deeper secondary review assessing quality (see p. 2-4). Recommendations include keeping the policy, combining it with other policies, amending, or adding a new measure.

Exhibit 3. Spokane Policy Screening Process



The consultant team qualitatively reviewed the following plans and codes with the same criteria as the other plans/codes, which are addressed in Section 3.

- Spokane Shoreline Master Program (SMP) Regulations (SMC <u>17E.060</u>)
- Spokane Critical Areas Ordinance (SMC <u>17E</u>.010, 020, 030, 040, 070)



The relationship of the plan and code elements and the 11 Commerce Sectors is shown in Exhibit 4. Commerce recommends identifying approximately 20-40 collective measures addressing each of the 11 sectors in the Comprehensive Plan.

Exhibit 4. Relationship of Spokane Plans and Codes to Commerce Climate Sectors

Spokane Plan or Code by Commerce Sector	Agriculture & Food Systems	Buildings & Energy	Cultural Resources & Practices	Economic Development	Ecosystems	Emergency Management	Health & Well- being	Transportation	Waste Management	Water Resources	Zoning & Development
Comp Plan Land Use	X	Χ									Х
Comp Plan Transportation						Χ		X			
Comp Plan Capital Facilities and Utilities						X			X	Χ	
Comp Plan Housing		Χ									X
Comp Plan Economic Development				X							
Comp Plan Urban Design & Historic Preservation			X				X				X
Comp Plan Natural Environment					Χ					Χ	
Comp Plan Social Health	X						X				
Comp Plan Neighborhoods							Х				X
Comp Plan Parks, Recreation & Open Space					Χ						
Comp Plan Leadership, Governance							Х				
Comp Plan Shorelines Policies					Χ						X
Spokane Parks and Natural Lands Master Plan					Χ		Х				
SMC 15.05 Climate Change		Χ					X	X			
Spokane Shoreline Master Program Code			X		Χ						X
Spokane Critical Areas Ordinance					X				X		
City Council's Sustainability Action Plan		X		X	X		X	X	Χ	X	X

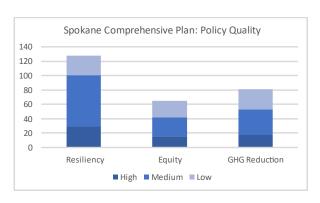
Source: BERK Consulting, 2024

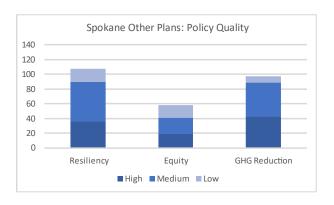
For the policies selected for a deeper secondary review policy quality was assessed as:

- Low Quality = loose connection to climate considerations/nothing enforceable or implementable
- Medium Quality = some climate considerations that are actionable
- High Quality = addresses climate risk and strategies well

There are more Spokane Comprehensive Plan policies that directly or indirectly address Resiliency than GHG reduction or equity. There are more GHG reduction related measures in other plans though still an emphasis on resiliency. In other plans, the policy quality is higher than the Comprehensive Plan, since the Spokane Parks Master Plan, Spokane Climate Change Code, and City Council's Sustainability Action Plan were developed more recently and were written with climate mitigation and adaptation in mind. These documents are useful sources of policies to bring into the Comprehensive Plan.

Exhibit 5. Resiliency, Equity, and GHG Related Policy Quality



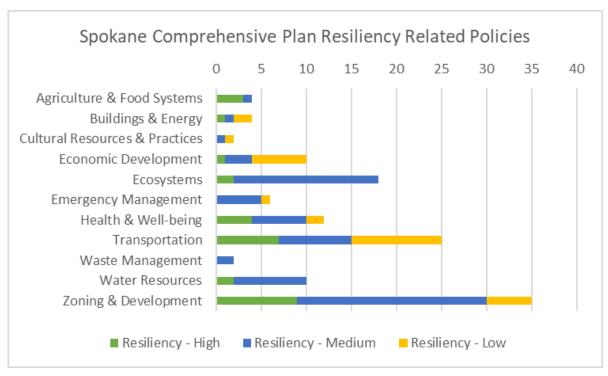


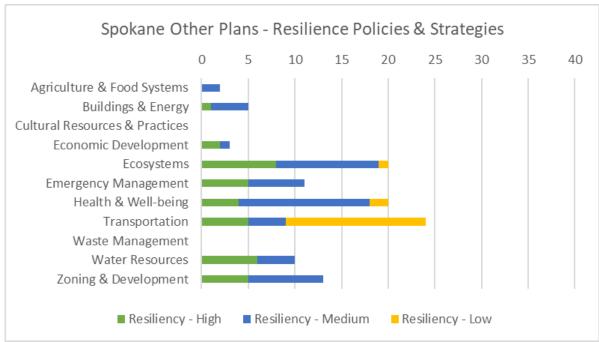
Source: BERK Consulting, Cascadia Consulting Group, Fehr & Peers, 2024.

The Spokane Comprehensive Plan contains more policies regarding zoning and development, transportation, and ecosystems, which is understandable since it is a plan that manages growth. There are fewer policies in:

- Agriculture & Food Systems
- Buildings & Energy
- Cultural Resources & Practices
- Emergency Management
- Waste Management
- Water Resources

Exhibit 6. Plan Policies and Strategies by Sector





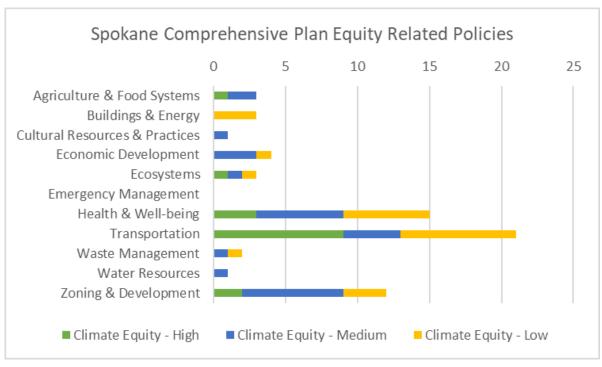
Source: BERK Consulting, Cascadia Consulting Group, Fehr & Peers, 2024.

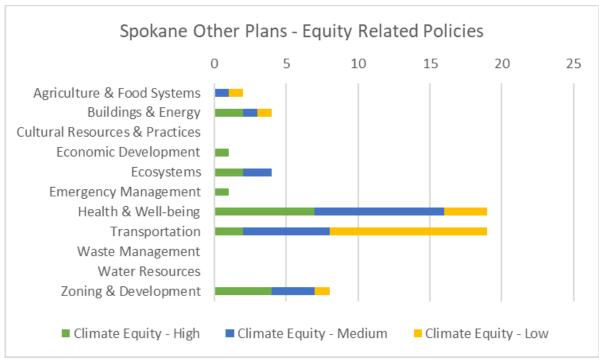
Equity is more prominent in the Transportation, Health & Well Being, and Zoning & Development sector policies. Equity is limited in Buildings & Energy, Cultural Resources & Practices, Ecosystems, Emergency Management, Waste Management, and Water Resources



policies. There are opportunities to amend or add policies regarding climate equity and environmental justice for these topics in the new climate planning effort.

Exhibit 7. Equity Related Plan Policies and Strategies by Sector



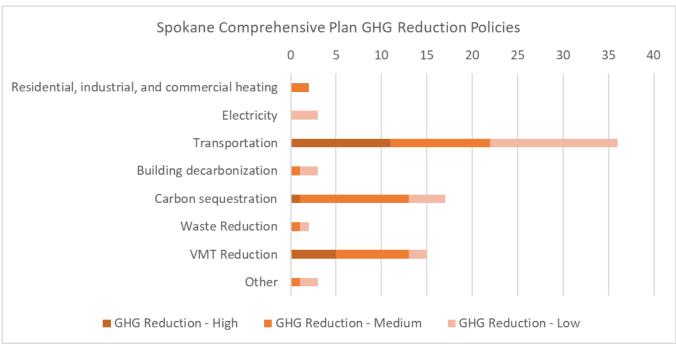


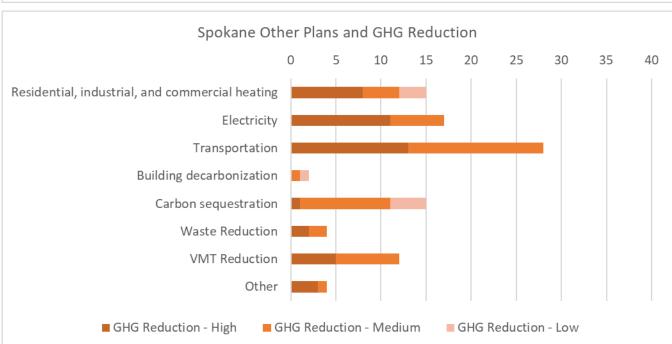
Source: BERK Consulting, Cascadia Consulting Group, Fehr & Peers, 2024.



Spokane Comprehensive Plan policies that relate to GHG reduction address transportation, carbon sequestration, and VMT reduction. In other plans, there is a wider variety of GHG reduction strategies related to heating, electricity, in waste reduction that could be a source of policies for the GHG emissions reduction sub-element.

Exhibit 8. GHG Related Policy Topics





Source: BERK Consulting, Cascadia Consulting Group, Fehr & Peers, 2024.



2.1 Comprehensive Plan Report Card

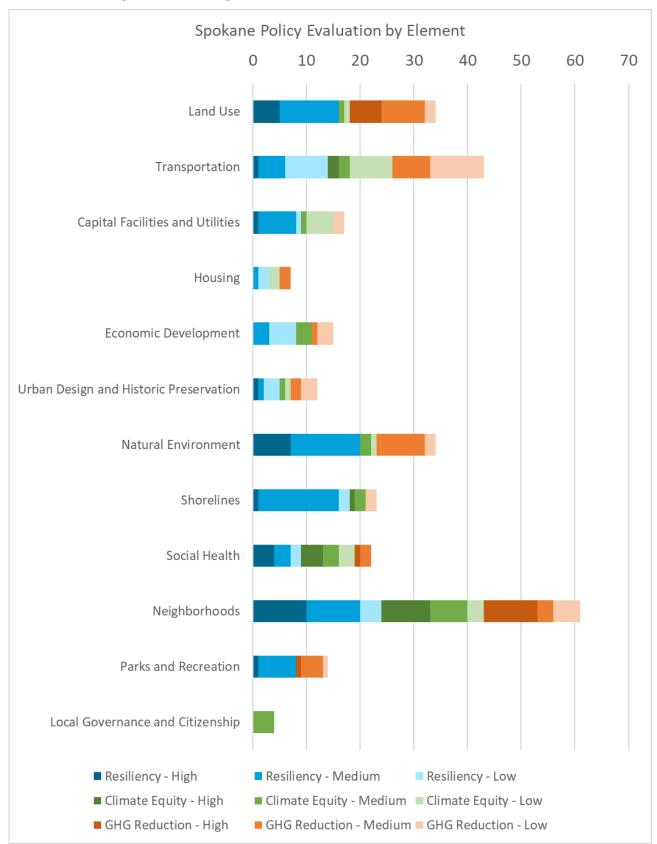
Exhibit 9 and Exhibit 10 illustrate the share of policies and their strengths and weaknesses by Comprehensive Plan element/chapters. Most elements have moderate or strong resiliency related policies, but some could use some bolstering where weak or limited. Most elements except for Neighborhoods are weak or limited on equity. Apart from Land Use, Transportation, Natural Environment, and Neighborhoods, most elements are weak or limited on GHG mitigation policies. Even where elements are moderate or strong, there are opportunities to combine or consolidate policies or to enhance policies of lower quality to be moderate or higher quality. The Local Governance and Citizenship element mostly addresses public participation and engagement and is broad; the element could be updated to reference climate planning and engagement efforts in other plans.

Exhibit 9. Spokane Comprehensive Plan Element Report Card - Strength of Existing Policies

ELEMENTS	Resiliency	Equity	GHG
Land Use	Moderate	Weak	Moderate
Transportation	Moderate	Limited	Moderate
Capital Facilities and Utilities	Moderate	Limited	Limited
Housing	Moderate	Weak	Limited
Economic Development	Limited	Limited	Limited
Urban Design and Historic Preservation	Weak	Weak	Limited
Natural Environment	Strong	Weak	Moderate
Shorelines	Strong	Weak	Weak
Social Health	Limited	Limited	Limited
Neighborhoods	Moderate	Moderate	Moderate
Parks and Recreation	Limited	Limited	Limited
Local Governance and Citizenship	Weak	Limited	Weak

Strong: Several policies address climate risk and resilience/equity/GHG mitigation priorities well **Moderate:** Some climate resilience/equity/GHG mitigation addressed with some strategies **Limited:** Few climate considerations regarding resilience/equity/GHG mitigation addressed **Weak:** No or minimal resilience/equity/GHG mitigation addressed

Exhibit 10. Policy Evaluation by Element





Source: BERK Consulting, Cascadia Consulting Group, Fehr & Peers, 2024.

This audit provides further recommendations by sector below. Policy examples are shown because they have higher impacts, address efforts already in progress that should have explicit goals, or have higher likelihood of successful implementation.

2.2 Agriculture & Food Systems

Current policies in the Spokane Comprehensive Plan are limited regarding food systems and could be augmented; existing policies are of higher quality. Some strategies in the Spokane City Council's Sustainability Action Plan (SSAP) could be incorporated. Six policies or strategies were evaluated as shown below.

Exhibit 11. Agriculture and Food Systems Goals, Policies and Strategies Audit

Selected Policies	Quality	Gap/Opportunity	Next Step
NE 8: Preserve land and provide opportunities for farming that generates produce for local markets and supports the farming economy.	Resilience: High	Add a policy on resilience of food system related to climate hazards. Include verbiage about how it improves food system resiliency while reducing VMT/GHG emissions.	New Measure
SH 8: Goal: Ensure that all citizens have convenient access to healthy food.	Resilience: High Equity: High	Opportunity for more specificity - what is convenient access?	Amend
SH 8.1 Promote the development of home and community gardens, farmers' or public markets, and other small-scale collaborative initiatives in order to provide citizens with a diverse choice of locally-based food products.	Resilience: High Equity: Medium GHG: High	None identified.	Keep

Selected Policies	Quality	Gap/Opportunity	Next Step
SH 8.2 Enable the establishment and maintenance of community gardens on city property, as appropriate.	Resilience: Medium Equity: Medium	None identified.	Keep
SSAP: Strategy 9. Ensure the City's process for approving development and service extensions addresses and prevents negative impacts to prime agricultural lands, critical wildlife habitats, and other natural areas in and around the city.	Resilience: Medium Equity and GHG: Low	Clarify City role such as urban farming that assumes smaller sites related to food system.	Bring into comprehensive plan from another document; amend
SSAP: TL 9.5 Partner with regional jurisdictions, businesses, and community-based organizations to preserve prime agricultural lands, critical wildlife habitats, working farms, and other natural areas both inside and outside city boundaries	Resilience: Medium GHG: Low	Clarify City role such as urban farming that assumes smaller sites related to food system.	Bring into comprehensive plan from another document; amend
SSAP: WD 2.1 Support diversion of excess edible food from commercial & institutional kitchens and grocery outlets to community members in need through food rescue programs	Equity and GHG: Medium	Could develop/implement rather than support; be more explicit about community members in need	Bring into comprehensive plan from another document; amend

2.3 Buildings & Energy

38 policies or strategies address buildings and energy, primarily through the SSAP. Only 8 goals and policies are in the Spokane Comprehensive Plan. Policies or strategies considered the most promising to amend or integrate in the Spokane Comprehensive Plan are noted



below. The listed policies and strategies are typically of medium or high quality or could be amended to make them higher quality and more implementable.

Exhibit 12. Selected Buildings & Energy Goals, Policies and Strategies Audit

Selected Policies	Quality	Gap/Opportunity	Next Step
CFU 1.5 Ensure that construction standards for public and private utilities are adequate to withstand the anticipated frequency and severity of natural and man-made hazards.	Resilience: Low	Ensure that the policy aligns with the Clean Buildings Act. Update construction standards to reflect best-available science on withstanding climate hazards.	Amend
CFU 1.8 Include intangible costs and benefits in any cost/benefit analysis when considering the development and life span of proposed capital facilities.	Equity: Low	Define intangible costs. Include climate resilience, equity, and GHG emission goals in the definition. Highlight that capital facilities projects must undergo a SEPA-like process to ensure minimal climate and environment effects.	Amend
CFU 4.3 Require new utility lines to be installed underground and encourage the conversion of existing overhead distribution lines to underground lines unless it is not physically feasible.	Resilience: High	Reference that Avista provides "strategic undergrounding" to reduce wildfire risk. Undergrounding is required in shoreline jurisdiction Section 17E.060.490. If new franchise utility lines, in an area with underground, then must be underground SMC 10.27A.620.	Amend
CFU 5.6 Encourage electrical utilities to base their facility siting decisions on the most recent findings concerning the health impacts of power-frequency magnetic fields.	Equity: Low	Ensure that electrical utilities consider climate equity elements in siting decisions. Suggest amending and bringing into plan as part of EJ.	Amend
CFU 6: Use capital facilities and utilities to support multiple interests and purposes.	Equity: Low	Provide clarification on what are the interests and purposes. Add climate resiliency and equity language to the policy.	Amend



Selected Policies	Quality	Gap/Opportunity	Next Step
N 2.4 Encourage revitalization and improvement programs to conserve and upgrade existing properties and buildings.	Resilience, GHG: Low	None identified.	Keep
NE 18: Promote the conservation of energy in the location and design of residential, service, and workplaces.	GHG: Medium	Opportunity to provide examples such as passive cooling, green roofs, etc.	Amend
NE 18.1 Encourage innovative residential development techniques that produce low energy consumption per housing unit.	GHG: Medium	None identified.	Keep
Spokane Parks and Natural Lands Master Plan Objective 3. Focus On Neighborhood And Community Parks	Resilience and GHG: Medium	Energy efficiency can make buildings more resilient to increased costs of cooling during extreme heat	Bring into comprehensive plan from another document
» In park buildings, the Parks Department can support Spokane's Climate Action Strategy by incorporating energy efficiency and new energy technologies and building practices in new park facilities and infrastructure, while retrofitting eligible existing facilities using LEED certified and similar performance standards.			

Selected Policies	Quality	Gap/Opportunity	Next Step
Section 15.05.050 Electric Vehicles B. All City of Spokane building and construction permit fees required for the installation of an electric vehicle charging stations shall be waived until June 30, 2024.	GHG: High	Extend/adjust date	Amend
SSAP: BE 1 Strategy 1. Ensure new construction is as efficient as possible and ready to utilize renewable energy	GHG: Medium	How to ensure - update codes, etc. What is efficient as possible mean? Perhaps already addressed through energy code (at least first half of strategy). Promote incentives to be solar ready.	Amend
SSAP: BE 1.1 The City will take a leadership role in providing direction and facilitating building decarbonization by working with local partners to implement the State energy code	GHG: Low	Add specificity around what decarbonization in buildings looks like, what local partners.	Amend
SSAP: BE 1.2 Build community awareness on the benefits of choosing electrification and develop incentives for installing electric air and water heating/cooling systems, including heat pumps	GHG: High	Add timeline and funding source for developing incentives program	Amend

Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: BE 1.4 Incentivize electrification of all new construction (residential and commercial) including incentivizing electrification and renewable energy sources through City permitting process.	GHG: Medium	Align with building codes; could require versus incentivize.	Amend
SSAP: BE 1.5 Require all new commercial buildings to install conduit and roof support for a future solar system if the building is in an appropriate location to utilize solar	GHG: High	Align with building codes	Amend
SSAP: BE 1.6 Encourage and incentivize renewable, low-carbon materials, such as cross-laminated timber, in construction.	GHG: Medium	Revise to remove "such as cross-laminated timber" since there are a number of other examples. Also identify potential funding sources for incentives and timeline for introducing program.	Bring into comprehensive plan from another document; amend.
SSAP: BE 1.7 Encourage the re-use of existing buildings, including efficiency retrofits, rather than demolishing and starting new	GHG: Low	Strengthen language - incentivize instead of encourage	Amend
SSAP: BE 2.1 Evaluate all municipal buildings to determine a path to net neutral emissions by 2025 through retrofits or renewable energy installation, including offsite generation, to benefit under CETA programs	GHG: High	Will edit to 2030. Combine with BE 2.4.	Amend, Combine/consolidate



Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: BE 2.4 Participate in energy efficiency and conservation programs offered by local utilities for City owned facilities	GHG: Medium	Combine with BE 2.1.	Bring into comprehensive plan from another document, Combine/consolidate
SSAP: BE 3.5 Partner with local energy companies to create and implement a citywide plan for largescale, community solar installations	GHG: High	Reflect latest status with Avista.	Bring into comprehensive plan from another document
SSAP: BE 5.1 Partner with Avista to increase renewable natural gas (RNG) into the gas supply	GHG: High	Could remove or rewrite to reference the City considering the feasibility of RNG for WWTP.	Amend
SSAP: BE 6.5 Fund and implement a contractor training program led by building scientists for carbon-efficient building methods, appliances, and products	GHG: High	None identified.	Bring into comprehensive plan from another document
SSAP: BE 6.6 Create a public outreach and scheduling hub to connect contractors with prospective customers for clean building projects	GHG: High	Could amend or remove. Refer to SNAP and other non-profits that have role.	Amend
SSAP: IS 11.1 Continue to update and publish greenhouse gas emissions inventories for both the City of Spokane municipal organization and the Spokane community	GHG: Medium	Add interval, combine with other inventory policies (IS 7.1). Align language to the emissions inventory management requirements of HB 1181 guidance from Commerce.	Combine/consolidate

Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: IS 3.4 The Mayor's proposed budget, presented during the annual budget review process, will incorporate a report on energy efficiency, water conservation, and resiliency action projects that are funded in existing work plans or will be incorporated into work plans for the upcoming fiscal year	Resilience, GHG: Medium	Add specificity around energy efficiency, water conservation, and resiliency action projects; would need to be reworded, and metrics/indicators of what success for those identified items would also be needed.	Amend
SSAP: IS 7.1 Conduct a community-wide GHG inventory every two years using ICLEI's Clear Path protocol; the inventory shall include an assessment of local government operations as well.	GHG: High	See IS 11.1 above for possible combinations	Combine/consolidate
SSAP: Strategy 1. Ensure new construction is as efficient as possible and ready to utilize renewable energy	Resilience, GHG: Medium	Perhaps already addressed through energy code (at least first half of strategy). Promote incentives to be solar ready.	Bring into comprehensive plan from another document, Amend
SSAP: Strategy 3. Invest in community-scale and distributed energy generation and storage	Resilience, GHG: Medium	Seems to duplicate BE 3.5 above, should be merged with that one	Bring into comprehensive plan from another document, Combine/consolidate

2.4 Cultural Resources & Practices

Few Spokane Comprehensive Plan policies address cultural resources from a resilience or equity perspective. It is a gap area that could be addressed in the policy development phase. Some policies in Ecosystems provide cross-sector support for protecting critical areas and enhancing cultural resources such as traditional foods and medicines.



Exhibit 13. Cultural Resources Goals, Policies and Strategies Audit

Selected Policies	Quality	Gap/Opportunity	Next Step
DP 3: Preserve and protect Spokane's historic districts, sites, structures, and objects.	Resilience: Low	Amend Goal to address cultural resources as well as historic resources. Add policy under the goal regarding culturally important resources (foods, medicinal plants, and materials) that could be adversely impacted by a changing climate. Conservation could also support sustainability and carbon sequestration.	Amend and add New measure
DP 3.4 Encourage awareness and recognition of the many cultures that are an important and integral aspect of Spokane's heritage.	Equity: Medium	Consider addressing tribal treaty rights and sovereignty in its own policy as a companion to this policy that is broader about many cultures.	New measure.
DP 3.7 Ensure that archaeological and historic sites are identified and protected.	Resilience: Medium	Add reference to resilience including adaptation to a changing climate (flooding, heating/cooling/filtration).	Amend
DP 3.12 Encourage the deconstruction and reuse of historic materials and features when historic buildings are demolished.	GHG: Medium	Reference climate mitigation to support reuse. Consider new Spokane ordinance that helps implement (ORD C36575).	Amend

Selected Policies	Quality	Gap/Opportunity	Next Step
SMP 11.52 Provide for the protection and preservation of ecosystem-wide processes, ecological functions, and cultural resources, including but not limited to, fish and fish passage, wildlife and water resources, shoreline critical areas, hydrogeological processes, and natural scenic vistas when siting instream structures.	Resilience: Medium	Not identified.	It is a comprehensive policy that shows interrelationship of ecosystem and cultural resources.

2.5 Economic Development

There are 16 Economic Development policies or strategies that were evaluated, and all are listed in Exhibit 14 below. With amendments some policies could more centrally address or emphasize resilience, equity, or GHG reductions.

Exhibit 14. Economic Development Goals, Policies and Strategies Audit

Selected Policies	Quality	Gap/Opportunity	Next Step
ED 2.1 Ensure opportunities for locating a variety of desirable, livable wage industries in Spokane that are environmentally compatible with adjacent land uses and support a range of employment types.	Resilience: Low	More livable wage jobs could improve adaptive capacity generally. "Environmentally compatible" is vague. This policy could potentially be modified to discuss green jobs.	Amend

Selected Policies	Quality	Gap/Opportunity	Next Step
ED 2.2 Provide incentives to encourage the revitalization and utilization of historic and older commercial and industrial districts for redevelopment.	Resilience, GHG: Low	May improve the structural safety of old buildings which could make them more resilient to a variety of hazards. Reusing old buildings also reduces emissions from development. Review new demolition code, Ord C36575.	Amend
ED 2.3 Continue to maintain an inventory of historic and significant older buildings that could be redeveloped for economic activities rather than demolished.	GHG: Low	Reusing old buildings reduces emissions from development. Match/relate to new Ord C36575.	Amend
ED 3.7 Encourage opportunities for teleworking and home businesses that are compatible with residential neighborhoods.	GHG: Medium	There is more support for home businesses/ neighborhood nodes than telework considering impact on downtown/ businesses. Could link to neighborhood nodes/ 15-minute city to have services in neighborhoods.	Amend
ED 4.1 Encourage the recruitment of businesses that pay wages at least commensurate with the cost of living and that provide health and retirement benefits.	Resilience, Equity: Medium	None identified.	Keep Living wages and health insurance can help with adaptive capacity especially among communities with lower incomes.
ED 4.3 Cooperate with other community agencies and organizations to address income equity and employment opportunities within the Spokane economy.	Resilience, Equity: Medium	None identified.	Keep Supports adaptive capacity



Selected Policies	Quality	Gap/Opportunity	Next Step
ED 5.4 Support efforts to introduce new, high quality programs into the curricula of area technical schools, community colleges, colleges, and universities that address the changing needs of businesses and employees.	Resilience: Low	Add mention of green jobs programs. Could also revise to be clear about how City would support. For example, the City could support/coordinate with University District PDDA. Looks like they have a strategic plan and sustainability practices.	Amend
ED 7.5 Use tax incentives and investments to encourage revitalization, modernization, or rehabilitation of deteriorated residential and commercial properties and buildings for new economic activity.	Resilience, GHG: Low	None identified.	Keep May improve the structural safety of old buildings which could make them more resilient to a variety of hazards. Reusing old buildings also reduces emissions from development.
ED 8.2 Promote sustainable economic strategies.	Resilience: Low	General policy, others are more specific on similar topic. Provide examples.	Amend
H 1.3 Provide incentives for employers to sponsor or develop affordable housing in proximity to their place of employment.	Resilience, Equity: Low GHG: Medium	Specify what type of incentives City is willing to offer employers. Prioritize areas with the highest vulnerability identified in the Spokane Climate Vulnerability and Risk Assessment.	Amend

Selected Policies	Quality	Gap/Opportunity	Next Step
NE 10.2 Local Business Support. Support and provide incentives for businesses that employ local people, use local materials, and sell their products and/or services locally.	Resilience: High GHG Reduction: Medium	Specify role and funding sources.	Amend
NE 10.3 Identify and provide incentives for economic activities that combine the goals and principles of economy, ecology, and social equity.	Resilience, Equity: Medium	Consider adding resilience in statement. Define what economic activities are to support implementation.	Amend
SMC Section 15.05.040 Solar Energy Systems C. The Community and Economic Development Services Department shall adopt processes and procedures that promote and streamline local production and sourcing of renewable energy.	GHG: High	Have updated SMC to streamline the permitting process; could add a Comprehensive Plan policy to support the continued concepts.	Bring into comprehensive plan from another document
SSAP: EP 2.1 Provide resources to small businesses helping them save money through energy efficiency and resource conservation strategies.	Resilience, GHG: Medium	Specify what kind of resources- money, education, etc. The language seems like the work SNAP and electric utility do. There is potential to create an overarching goal that talks about resource conservation since that would cover energy, water, etc.	Amend



Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: SW 1.1 Establish a workforce development technical advisory group for the purpose of identifying opportunities to preserve existing skilled workforce while meeting emerging needs in clean energy, circular economy, and conservation sectors	Resilience: High	Recognize existing entities (e.g., Spokane Workforce Council, Urbanova INTENT organization) that address these aspects. Amend to address partnering or supporting those activities instead of establishing them.	Bring into comprehensive plan from another document, Amend
SSAP: SW 1.3 Recruit and train next generation energy workers with an emphasis on promoting programs that advance equity and diversity	Resilience, Equity: High	What is City role? Is this in partnership with Avista? See notes on SW 1.1, could combine the equity info in there.	Amend, Combine/consolidate

2.6 Ecosystems

There are 41 policies or strategies reviewed under the Ecosystems sector and 38 of these are listed below as most relevant to a changing climate; the three not listed were considered duplicative of others or too vague. The topic is generally strong in the current plans but there are opportunities to address climate hazards and equity especially more explicitly, especially regarding green infrastructure.

Exhibit 15. Selected Ecosystems Goals, Policies and Strategies Audit

Selected Policies	Quality	Gap/Opportunity	Next Step
DP 2.15 Maintain, improve, and increase the number of street trees and planted areas in the urban environment.	Resilience: High Equity: Low GHG: Medium	Opportunity to prioritize areas most in need of tree canopy, as identified in the Spokane Climate Vulnerability and Risk Assessment, particularly where urban heat island effect is most prevalent.	Amend



Selected Policies	Quality	Gap/Opportunity	Next Step
N 6.3 Identify and protect nature and wildlife corridors within and between neighborhoods.	Resilience: Medium GHG: Low	None identified.	Keep
NE 2.3 Preserve native vegetation in parks and other publicly owned lands in the design and construction of new public facilities.	Resilience: Medium GHG: Low	Consider adding native vegetation to existing parks and public facilities.	Amend
NE 6.1 Adaptive Plants and Trees Encourage the use of and development of standards for using native and nonnative adaptive plants and trees in landscape designs for public and private projects.	Resilience, GHG: Medium	Update standards for landscaping based on climate trends, such as drought, pests, etc.	Amend
NE 7.5 Integrate the protection of slopes with wildlife corridor and natural area designations and acquisitions.	Resilience; High	Consider identifying areas of potential increased risk due to extreme precipitation.	Amend
NE 7.7 Enforce regulations that achieve no overall net loss in acreage and functions of the remaining wetland base and, over the long term, increase the quantity and quality of wetlands in the city.	Resilience, GHG: Medium	None identified.	Keep
NE 12: Maintain and enhance the urban forest to provide good air quality, reduce urban warming, and increase habitat.	Resilience, GHG: Medium	Consider adding reference to priority locations.	Amend



Selected Policies	Quality	Gap/Opportunity	Next Step
NE 11.3 Acquire natural areas and connecting corridors using acquisition techniques to create a network of natural areas.	Resilience: High GHG: Medium	Combine with policies in Park Master Plan that are relevant to natural areas. Incorporate biodiversity language as well.	Combine/ consolidate
PRS 1.1 Provide an open space system within the urban growth boundary that connects with regional open space and maintains habitat for wildlife corridors.	Resilience, GHG: Medium	Integrate Parks Master Plan relevant goals/policies. Could also combine with Natural Environment; though this is a separate element and open space/wildlife focused.	Combine/consolidate
PRS 2.4 Support a comprehensive urban forestry program.	Resilience, GHG: Medium	Could specify target to fill gaps or increase canopy cover overall. Review with DP 2.15.	Amend
SMP 2: Maintain and provide adequate public facilities and utility services within the shoreline environment while preserving and enhancing the natural environment and ecology of the shoreline.	Resilience: Medium	Opportunity to include climate equity language. Prioritize areas who have been historically underinvested in the placement of public facilities.	Amend
SMP 2.1 Assure no net loss of shoreline ecological functions as a result of the improvement, development, expansion, location, design, or maintenance of any facility or utility.	Resilience: Medium	None identified.	Keep
SMP 4.2 Preserve, protect and restore unique and non-renewable resources or features such as wetlands, wildlife habitat, agricultural areas, and special natural areas.	Resilience: Medium	None identified.	Keep



Selected Policies	Quality	Gap/Opportunity	Next Step
SMP 4.4 Acquire and maintain, through conservation futures, donations, general funds, or other sources, shoreline areas containing natural elements especially worthy of preservation or especially attractive to the public, such as beaches, forest cover, trees, wildlife populations, vistas and other scenic features.	Resilience: Medium	None identified.	Regarding PRS Element, consider clarifying park acquisition approach similar to this policy.
SMP 4.6 Require that new development or redevelopment avoid or mitigate negative impacts to steep banks, surface and ground water quality, ecological functions, wildlife habitat, vegetative cover, and erosion of the soil.	Resilience: Medium	Opportunity to incorporate sustainable building practices near shorelines.	Amend
SMP 8: Assure and develop appropriate and inviting physical and visual public access to and along the Spokane River and Latah Creek while caring for the indigenous shoreline characteristics.	Resilience: Medium	None identified.	Keep
SMP 10: Restore or rehabilitate impaired or blighted areas along the shorelines to an ecologically functioning condition with an emphasis on native plant communities appropriate to the environmental designation.	Resilience, Equity: Medium	None identified.	Keep



Selected Policies	Quality	Gap/Opportunity	Next Step
SMP 11.52 Provide for the protection and preservation of ecosystem-wide processes, ecological functions, and cultural resources, including but not limited to, fish and fish passage, wildlife and water resources, shoreline critical areas, hydrogeological processes, and natural scenic vistas when siting instream structures.	Resilience: Medium GHG: Low	None identified.	Keep Comprehensive policy that shows interrelationship of ecosystem and cultural resources.
SMP 11.53 Consider the full range of public interests, watershed functions and processes, and environmental concerns when planning and locating in-stream structures, with special emphasis on protecting and restoring priority habitats and species.	Resilience: Medium	None identified.	Keep
SMP 11.6 Plan for the enhancement of impaired ecological functions where feasible and appropriate, while accommodating permitted uses.	Resilience: Medium	None identified.	Keep

Selected Policies	Quality	Gap/Opportunity	Next Step
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement – Land Objective 5. Enhance Our Natural Lands With Projects To Restore Ecologies And Build Resilience To Natural Disasters	Resilience, Equity: High	Working with Tribal partners on land management relates to climate equity. Consider input through Tribal engagement.	Bring into comprehensive plan from another document
Form partnerships and team with interdisciplinary exports [experts], such as working with Tribal partners to develop traditional ecological management strategies or partnering with federal agencies to learn best practices for forest treatments.			
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Land Objective 1. Initiate Framework For Natural Land Acquisition Decision-Making Create acquisition plan to prioritize parcels that link and create contiguous green network with goals around wildlife habitat provision, conserving and enhancing vegetation quality and water quality management. Undeveloped lands that are not located near existing city-owned Natural Lands should also be considered for acquisition, specifically in	Resilience, Equity: High GHG: Medium	Potential to combine with existing Parks Element or Natural Environment or Neighborhood policies.	Bring into comprehensive plan from another document

Selected Policies	Quality	Gap/Opportunity	Next Step
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Land Objective 2. Further Regional Partnerships For Land Acquisitions Explore advancements to existing partnerships, such as INLC and Spokane County, and enhancing efforts made by the Coeur d'Alene Tribe for natural land preservation.	Resilience, GHG: Medium	Potential to combine with existing Parks Element policies.	Combine/consolidate
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Land Objective 3. Focus On Neighborhood And Community Parks Couple neighborhood and community park improvements with environmental protection tactics that address climate change impacts. On existing developed parklands, such as community and neighborhood parks, the City can implement landscaping changes that convert existing spaces that require large park resources, such as unused turf lawns, to drought tolerant plantings, pollinator gardens and low maintenance vegetation.	Resilience; High GHG: Medium	None identified.	Bring into comprehensive plan from another document



Selected Policies	Quality	Gap/Opportunity	Next Step
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Land Objective 2. Invest In Equity Zones Explore revising citywide street tree maintenance program to ensure proper maintenance does not adversely burden community members and/or result in inadequate urban tree canopy coverage.	Resilience, Equity: Medium	Could be made stronger by strengthening the language – example: "review citywide street tree maintenance program for opportunities to xxxx". Potential to combine with existing Parks Element and tree canopy policies (see NE 6).1	Combine/consolidate
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Land Objective 5. Enhance Our Natural Lands With Projects To Restore Ecologies And Build Resilience To Natural Disasters Form partnerships and team with interdisciplinary exports, such as working with Tribal partners to develop traditional ecological management strategies or partnering with federal agencies to learn best practices for forest treatments.	Resilience, Equity: High	Working with Tribal partners on land management relates to climate equity. Consider input through Tribal engagement.	Bring into comprehensive plan from another document

¹ NE 6: Protect and enhance diverse and healthy native species, such as plants, trees, animals, and fungi, for present and future generations and respect the ecological necessity of bio-diversity.



Selected Policies	Quality	Gap/Opportunity	Next Step
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Land Objective 5. Enhance Our Natural Lands With Projects To Restore Ecologies And Build Resilience To Natural Disasters Implement strategies that reduce and remove invasive species to support the growth of native vegetation and habitats.	Resilience: High GHG: Low	Invasive species have potential to spread as temperatures warm	Bring into comprehensive plan from another document
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: People Objective 3. Partnerships With Schools Consider "professional" classes for adults for landscape maintenance, such as proper pruning techniques and other technical classes.	Resilience; Medium	Could relate to climate equity by making classes free. Improves resilience by making sure trees are properly cared for and less likely to fail in extreme weather.	Bring into comprehensive plan from another document
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: People Objective 3. Partnerships With Schools Explore opportunities to create educational programs/activities with local schools on environmental and natural resource education.	Resilience: Medium	Could specify education around reducing emissions, pollution, etc.	Bring into comprehensive plan from another document



Selected Policies	Quality	Gap/Opportunity	Next Step
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Legacy Objective 5. Expand Programs For Improved Park Sustainability And Resilience Explore possibility for nature and water center for education of community including youth.	Resilience: Medium	Could specify education around reducing emissions, pollution, etc.	Bring into comprehensive plan from another document
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Legacy Objective 3. Expand Volunteerism Programs And Acknowledgement. Partner with others for tree planting.	Resilience, GHG: Medium	Potential to combine with existing Parks Element policies.	Combine/consolidate
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Legacy Objective 5. Expand Programs For Improved Park Sustainability And Resilience Integrate additional education and outreach programs that promote natural resources stewardship.	Resilience: Medium	Potential to combine with existing Parks Element policies.	Combine/consolidate

Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: NE 4.1 Expand incentive programs like SpokaneScape that encourage residents to replace lawn with mulch and native, drought-tolerant plant species in connection with Water Resources strategy 6	Resilience: High GHG: Low	Consider amending to identify potential funding sources for incentives and timeline for introducing program. Could consolidate with CFU 5.2 to avoid duplication. ²	Bring into comprehensive plan from another document, Combine/consolidate
SSAP: NE 4.4 Partner with Department of Natural Resources to create climate-informed and fire-adapted community strategies around urban canopy, particularly near urban-wildland interface	Resilience: High	Review with team addressing WUI since work is underway.	Bring into comprehensive plan from another document, Amend
SSAP: NE 5.4 Partner with BIPOC-led organizations to build awareness and promote natural resource stewardship across broad populations within the city.	Resilience, Equity: Medium	Define natural resource stewardship, make more specific to climate?	Amend
SSAP: WR 2.1 Protect the following sensitive resources through acquisition, maintenance, and restoration strategies: wetlands, riparian areas, and spawning and rearing habitats of native fish species	Resilience; High GHG: Medium	Combine with Natural Environment policies. Duplicative of 4.4 but could combine some of the language.	Combine/consolidate, Bring into comprehensive plan from another document

 $^{^{2}}$ Addressed under Water Resources. CFU 5.2 Encourage public and private efforts to conserve water.



Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: WR 11 Identify opportunities to acquire and restore critical areas, natural areas, and connect riparian corridors for protection and conservation	Resilience, GHG: Medium	Add next step after identifying. May duplicate 4.4 and could combine. ³	Amend, Combine/consolidate
SSAP: WR 11.2 Develop partnership with Washington Department of Ecology, Spokane County Conservation District, the Spokane Tribe of Indians, the Coeur d'Alene Tribe, and non-governmental organizations to restore shorelines of the Spokane River and its tributaries	Resilience: High	Seems similar to 4.4 but the tribal discussion could be good language to include since this project also includes tribal engagement that begins this kind of discussion. 3	Bring into comprehensive plan from another document, Combine/consolidate

2.7 Emergency Management

19 goals, policies, or strategies address emergency management, and 16 are highlighted below as potential ones to add, amend, or retain to meet climate planning needs for emergency management. The other three not shown address topics covered in other goals and policies (preparation of hazard mitigation plan, capital plan, and regional wildfire risk efforts). The SSAP and the Parks Master Plan are sources to bolster policies on climate hazards and emergency management.

³ SSAP WR 4.4 Support the identification of habitat limiting factors that may be impacting native fish species



Exhibit 16. Selected Emergency Management Goals, Policies and Strategies Audit

Selected Policies	Quality	Gap/Opportunity	Next Step
CFU 3.4 Continue to participate in a coordinated regional plan for the provision of public services in the event of natural or man-made disasters.	Resilience; Medium	Continue to partner with Spokane County and the surrounding jurisdictions and agencies to ensure a coordinated regional response to climate.	Amend
NE 7.4 Continue to designate unstable slopes as not suitable for development.	Resilience: Medium	Consider identifying areas of potential increased risk due to extreme precipitation.	Amend
NE 19.2 Conduct a reassessment of the 100-year flood plain in areas with a history of flooding.	Resilience; Medium	Address trends of a changing climate to ensure reassessment study boundaries capture any areas of increased potential impact.	Amend
SMP 6: Prevent and minimize flood damage in shoreline areas to protect ecological functions, shoreline habitat, lives, and public and private property.	Resilience; Medium	Could reference climate trends and resilience.	Amend
SMP 6.2 Coordinate flood hazard reduction planning among the applicable agencies.	Resilience: Low	Could give more detail and link to regional hazard management or climate hazard reduction.	Amend, combine/ consolidate.
SMP 6.3 Maintain, protect, and restore natural vegetative buffers that are within the floodway of the Spokane River and Latah Creek that function to reduce flood hazards.	Resilience; Medium	None identified.	Keep

Selected Policies	Quality	Gap/Opportunity	Next Step
SMP 6.4 Prohibit development within channel migration zones (CMZ) that interferes with the normal process of channel migration, consistent with Chapter 17E.030, Floodplain Management, of the Spokane Municipal Code.	Resilience; Medium	None identified.	Keep
SMP 6.5 Allow new structural flood hazard reduction measures only: • where demonstrated to be necessary, and when nonstructural methods are infeasible and mitigation is accomplished; and • landward of associated wetlands and buffer areas except where no alternative exists, as documented in a geotechnical analysis; and • when consistent with current best management practices, using natural materials whenever feasible.	Resilience; Medium	None identified.	Keep

Selected Policies	Quality	Gap/Opportunity	Next Step
Parks Master Plan: Develop "fuel reduction" treatments that thin and remove vegetation, focusing on dryer forests that are more prone to frequent fires. Thinning vegetation, or fuels, disrupts the amount of vertical and horizontal vegetative continuity that create the intense, hot and fast fire spread. This approach is commonplace for large land managers such as the U.S. Forest Service, who use it to reduce the risk of catastrophic "mega fires" that have come to define this era of increased fire frequency and intensity.	Resilience: High	Review regarding WUI since this work is underway already and tie in with SMP 4.4.	Bring into comprehensive plan from another document, amend.
SSAP: HW 3 Include climate impacts in disaster and emergency management response	Resilience: Medium	Add climate impacts to specific disaster and emergency response plans. Combine with previous climate impact/emergency response goals.	Amend, Combine/consolidate
SSAP: HW 3.2 Ensure City's disaster and emergency management plans include specific strategies to prepare for vulnerabilities identified in the Climate Vulnerability Assessment and from other relevant sources	Resilience: High		Bring into comprehensive plan from another document
SSAP: HW 3.3 Partner with regional emergency and disaster response teams to ensure a regional approach is used to respond to any future crisis or challenge	Resilience: Medium	Add climate. Combine with previous climate impact/emergency response goals above.	Amend



Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: HW 3.4 Develop regional plan to respond to impacts of increased heat and wildfire smoke on vulnerable populations, including identifying public buildings to function as cooling and clean air centers and addressing associated mental health needs	Resilience: High	City is working on this, and this could be explicit goal.	Bring into comprehensive plan from another document
SSAP: HW 4.2 Develop public outreach campaign on how residents should respond to high heat risks and wildfire smoke.	Resilience: High	None identified.	Bring into comprehensive plan from another document
SSAP: IS 7.4 Integrate projected climate impacts into data models for risk assessment	Resilience: Medium	None identified.	Keep
SSAP: WR 2.4 Partner with regional agencies and organizations to develop a flood risk assessment to responsibly manage areas projected to experience increased flooding events resulting from climate change	Resilience: High	Combine with Natural Environment policies. Consider if covered by the emergency management goals from items above.	Combine/consolidate, Bring into comprehensive plan from another document

2.8 Health & Well-being

43 policies or strategies were evaluated regarding Health and Well-being. In addition to amending or improving existing Spokane Comprehensive Plan policies, there are others in the City Council's SSAP and the Spokane Parks Master Plan that could be integrated. Three policies are not included in the matrix from the City Council's SSAP due to duplication.

Exhibit 17. Selected Health and Well-being Goals, Policies and Strategies Audit

Selected Policies	Quality	Gap/Opportunity	Next Step
H 2.1 Provide assistance for housing rehabilitation beyond housing maintenance code requirements if the assistance is supportive of general community development activity and is on a voluntary basis.	Resilience: Medium Equity, GHG; Low	Clarity on "general community development activity". Potential to reframe as a policy for energy efficiency/lower energy costs/antidisplacement	Amend
LGC 1.2 Commit sufficient resources to planning activities in order to ensure that those activities engage the public and produce sound results.	Equity: Medium	City has used Commerce grants for current process. Once policies are adopted and implementation activities identified for Comprehensive Plan, the City will need to revisit ongoing funding. This could be part of the City's 5-year progress report under RCW 36.70A.130(9). Adjust implementation element of Plan.	Amend
LGC 1.3 Employ a variety of techniques and venues to ensure a broad representation of the citizenry in planning activities.	Equity: Medium	Consider broadening to residents, businesses, and community-based organizations.	Amend

Selected Policies	Quality	Gap/Opportunity	Next Step
LGC 2.1 Pursue and support a variety of public and private leadership training programs for the general public, elected officials and city staff	Equity: Medium	Potentially amend this policy to add education as well as training. Depending on the adopted policies for the Climate Element, some ongoing education and training could help staff and the public implement activities to increase resilience and GHG emission reduction. Adjust implementation element of Plan.	Amend
LGC 2.3 Strengthen the connection between city residents and city government by maintaining geographic diversity, cultural variety, and a wide range of community philosophies on boards and commissions	Equity: Medium	None identified.	Keep City has seated the Climate Resilience and Sustainability Board. They could provide ongoing support for the Climate Element implementation.
N 6.4 Ensure that city land, property, and infrastructure within neighborhoods are adequately maintained to protect the public health, safety, and welfare	Resilience, Equity: Low	None identified.	Keep
NE 5.2 Review and determine public benefits in comparison to the environmental impacts of new and existing public or private facilities that negatively impact the region's air quality and health of its citizens.	Equity: Medium	Address priority for persons most affected (environmental justice) and potential for increased impacts due to climate trends.	Amend



Selected Policies	Quality	Gap/Opportunity	Next Step
NE 5.5 Plant and preserve vegetation that benefits local air quality.	Resilience, GHG: Medium	Consider clarifying type of vegetation - native, trees, other.	Amend
PRS 1.4 Work cooperatively with property owners and developers to preserve open space areas within or between developments, especially those that provide visual or physical linkages to the open space network.	Resilience: Medium GHG: Low	Could also specify especially those that fill gap areas.	Amend
SH 2.6 Provide for the joint use of facilities that clusters services for child or adult day care, health care, human services, libraries, schools, and cultural, recreational, and educational programs, as needed.	Resilience: Medium Equity: Low GHG: Medium	Refer to equitable investment for vulnerable communities. Also, policy could list resilience hubs.	Amend
SH 5.1 Coordinate with public and private agencies and other appropriate entities to evaluate existing needs, facilities, and programs relative to health and human services, and develop regionally equitable and comprehensive programs and service delivery systems.	Resilience, Equity: Medium	Could combine with HW 4.4 ⁴ if needed.	Combine/ consolidate

 $^{^4}$ SSAP HW 4.4 Partner with Community Centers and local community organizations working with vulnerable populations to find alignment and opportunities to promote shared goals of health and wellbeing for Spokane residents.



Selected Policies	Quality	Gap/Opportunity	Next Step
SH 5.2 Provide financial, regulatory, and tax incentives for business and property owners, service providers, and developers in order to increase the number of neighborhood and district centers where health and dental clinics, and human services are available	Resilience, Equity: High	None identified.	Keep
SH 8.3 Develop incentive programs to encourage convenience stores – especially those located in areas with limited access to full-service grocery stores, to carry fresh produce.	Resilience, Equity: High	Consider tying to local produce/agriculture too.	Amend
TR 21: Promote healthy communities by providing a transportation system that protects and improves environmental quality and partner with other agencies to implement innovative and effective measures to improve safety that combine engineering, education, evaluation, and enforcement	Resilience: High GHG: Medium	Seems duplicative to the already existing bike/ped goals listed. Combine/consolidate.	Combine/consolidate
NE 5: Work consistently for cleaner air that nurtures the health of current residents, children and future generations.	Resilience: Medium Equity: Low	Add policy regarding identification of overburdened populations and allocation of resources to most in need.	Amend

Selected Policies	Quality	Gap/Opportunity	Next Step
TR GOAL E: Protect natural, community, and neighborhood assets to create and connect places where people live their daily lives in a safe and healthy environment.	Equity: Low	Add mention of focusing on marginalized and underserved communities.	Amend
N 4: Provide Spokane residents with clean air, safe streets, and quiet, peaceful living environments by reducing the volume of automobile traffic passing through neighborhoods and promoting alternative modes of circulation.	Resilience, Equity, GHG: High	None identified.	Keep
SH 5: Create policy framework, laws, and regulations that expand and develop wellness programs, affordable and accessible health and human services, affordable and ADA-accessible housing, child and adult day care, and other public benefit uses.	Resilience, Equity: Medium	None identified.	Кеер

Selected Policies	Quality	Gap/Opportunity	Next Step
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: People Objective 1. Refresh program offerings Form partnerships with non-profits and higher education institutions to introduce thousands of students to water safety and swimming.	Resilience, Equity: Medium	Could specify free or low fee classes to get more to climate equity. Safe swimming skills would open up swim areas as heat refuges for more people, particularly those with lower incomes who may not have access to paid swim classes.	Bring into comprehensive plan from another document
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Land Objective 5. Enhance Our Natural Lands With Projects To Restore Ecologies And Build Resilience To Natural Disasters Grow the urban forest to take in carbon and filter particulate matter from the air, provide shade and mitigate the urban heat island effect of hot summers, and provide critical wildlife habitat for feeding, nesting and migration.	Resilience: High GHG: High	Could relate to climate equity by specifying "urban heat island effect, particularly in neighborhoods with little tree cover." Combine with other tree canopy policies since this is more just an explanation of the "why."	Bring into comprehensive plan from another document

Selected Policies	Quality	Gap/Opportunity	Next Step
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Land Objective 3. Focus On Neighborhood And Community Parks Prioritize investments in historically neglected or under-resourced neighborhoods through a Neighborhood Parks Initiative.	Resilience, Equity: High	Clear, strong language makes this a strong policy. Potential to combine with existing Parks Element policies. Could combine with goals or language around ensuring that the parks will have elements in them that support adaptive capacity for neighborhoods.	Combine/consolidate
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Land Objective 2. Invest In Equity Zones Prioritize investments in improving parks in Equity Zones (defined by history of investments, conditions, and demographics).	Resilience, Equity: Medium	Could make parks more resilient to climate events. Potential to combine with existing Parks Element policies. Could combine with Objective 3, Focus on Neighborhood and Community Parks though broader than Equity Zones.	Combine/consolidate

Selected Policies	Quality	Gap/Opportunity	Next Step
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Water Objective 1. Expand Access To Existing Outdoor Pools Explore a pilot project to expand the open and free public swim season from June through September. Policies might consider additional fees for expanded swim time. Objective 1. Refresh program offerings Form partnerships with non-profits and higher education institutions to introduce thousands of students to water safety and swimming.	Resilience: Medium Equity: Low	Free water access may be increasingly important during extreme heat. Possibility of fees makes this less of an equity policy.	Bring into comprehensive plan from another document
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Water Objective 1. Develop Additional Water Access Points Incorporate ADA design best practices for developed water access points, such as mobi-mats and on-site water wheelchair rentals.	Resilience; Medium, Equity High	Water as a refuge during extreme heat	Bring into comprehensive plan from another document



Selected Policies	Quality	Gap/Opportunity	Next Step
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Water Objective 2. Develop trails and boardwalks for safe swimming access in Spokane River Identify ideal locations for designated swimming areas in a natural setting within	Resilience; Medium, Equity High	Could provide refuge in extreme heat, and being free and open to the public helps it serve everyone	Bring into comprehensive plan from another document
city limits.			
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Water Objective 2. Develop trails and boardwalks for safe swimming access in Spokane River Partner with local outdoor outfitters or those who promote recreation in Spokane, such as Visit Spokane, providing an opportunity to inform residents about where these swimming access points are located and promote their safe use	Resilience; Medium, Equity High	Could provide refuge in extreme heat, and being free and open to the public helps it serve everyone	Bring into comprehensive plan from another document
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Water Objective 3. Provide additional splash pads in parks.	Resilience, Equity: Medium	Could provide refuge in extreme heat, and being free and open to the public helps it serve everyone	Bring into comprehensive plan from another document



Selected Policies	Quality	Gap/Opportunity	Next Step
Section 15.05.020 Greenhouse Gas Emissions Reduction Goals A. Consistent with its municipal powers under Washington State Law and RCW 70A.45.020, it is the goal of the City of Spokane to reduce anthropogenic GHG emissions created by any activities within the boundaries of the City of Spokane from 2016 baseline levels to 1,159,838 metric tons CO2e or 45% below 2016 levels by 2030; 632,639 metric tons CO2e or 70% below 2016 levels by 2040; and 105,440 metric tons CO2e and net zero emissions by the year 2050	GHG: Medium	Climate Element (even if spread across existing elements) could identify GHG goals. Suggest code amendments that update these to science-based targets as well (currently being analyzed in 2020-2022 inventory).	Amend

Selected Policies	Quality	Gap/Opportunity	Next Step
Section 15.05.020 Greenhouse Gas Emissions Reduction Goals C. Consistent with SMC 15.05.060, the City shall calculate and publicly publish the GHG emissions created by activities from within the City of Spokane boundaries at least every three years and provide a detailed report examining progress toward achieving the City's GHG emission reduction goals to the City Council and the public. In calculating GHG emission reductions, the City shall account for emission reductions that results from, including but not limited to, policies implemented and enforced by the State of Washington and the United States, along with measures undertaken pursuant to City ordinances and policies to reduce emissions.	GHG: High	Could amend language, since not all policies and actions can be estimated. Potential for language that says requires any policy aiming to reduce GHG emissions would include a target date and emission reduction estimate (CDP best practices).	Combine/consolidate, Amend

Selected Policies	Quality	Gap/Opportunity	Next Step
Section 15.05.020 Greenhouse Gas Emissions Reduction Goals D. Consistent with SMC 04.36 and based on the recommendation of the Sustainability Action Subcommittee, at least every three years the Mayor and the City Council will review the latest scientific recommendations from the Intergovernmental Panel on Climate Change and the National Climate Assessment in order to determine whether to modify its GHG emission reduction goals to best align it with the latest scientific research.	GHG: High	Should align with Comprehensive Plan requirements for updates, also the consideration of science- based targets.	Amend
SSAP: HW 2.3 Support policy that addresses low-income access to healthcare and health services, including health services for non-working individuals		Could develop/implement rather than support	Amend
SSAP: HW 2.4 Collaborate with regional partners to create a robust regional response to homelessness		Name regional partners, what does a robust regional response look like	Amend
SSAP: HW 2.5 Ensure schools and early learning facilities meet acceptable clean indoor air quality standards		How will measure/implement, 'ensure' seems vague. Reference the agencies with the responsibility for indoor air quality.	Amend



Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: HW 2.6 Support efforts to engage community leaders from underrepresented communities to determine barriers to health & healthcare access and create a 5-year plan to address those barriers		Could add specific communities; add climate. Define appropriate City role, or partner with Health District.	Amend
SSAP: HW 2.7 Partner with local medical and nursing schools and community-based organizations to increase healthcare outreach to low-income communities and unhoused persons		None identified.	Bring into comprehensive plan from another document
SSAP: HW 4.4 Partner with Community Centers and local community organizations working with vulnerable populations to find alignment and opportunities to promote shared goals of health and wellbeing for Spokane residents		Add climate. Seems like SH 5.1, consider relating to this policy.	Amend, Combine/consolidate

2.9 Transportation

69 policies and strategies were reviewed related to all modes of transportation. Several policies and strategies are recommended for amendment, consolidation, and integration. About 16 of the 69 policies and strategies are not further addressed; these are largely contained in the SSAP and are duplicative of Transportation Element policies.

Exhibit 18. Transportation Goals, Policies and Strategies Audit

Selected Policies	Quality	Gap/Opportunity	Next Step
N 2.3 Ensure that neighborhood-based services are available for special needs and located in proximity to public transit routes in order to be accessible to local residents.	Resilience, Equity: Medium GHG: High	None identified.	Keep
N 4.1 Consider impacts to neighborhoods when planning the city transportation network.	Resilience, Equity, GHG: Low	Specify what type of impacts will be considered (noise, construction, pollution, etc.) Amend with the issues being reduced and a focus on equity.	Amend
N 4.10 Coordinate with local school districts, private schools, and colleges to determine which bus and walking routes to and from neighborhood schools provide the highest degree of pedestrian safety	Resilience, Equity: Medium GHG: Low	None identified.	Keep
N 4.2 Refrain, when possible, from constructing new arterials that bisect neighborhoods and from widening streets within neighborhoods for the purpose of accommodating additional automobiles	Resilience, Equity, GHG: High	None identified.	Keep
N 4.3 Alter traffic patterns and redesign neighborhood streets in order to reduce non-neighborhood traffic, discourage speeding, and improve neighborhood safety	Resilience, Equity, GHG: High	None identified.	Keep



Selected Policies	Quality	Gap/Opportunity	Next Step
N 4.5 Promote a variety of transportation options to reduce automobile dependency and neighborhood traffic.	Resilience, Equity, GHG: High	None identified.	Keep
N 4.6 Establish a continuous pedestrian and bicycle network within and between all neighborhoods.	Resilience, Equity, GHG: High	None identified.	Keep
N 4.7 Design neighborhoods for pedestrians	Resilience, Equity, GHG: High	Consider combining with N 4.6 and N 4.9.	Combine/consolidate
N 4.8 Develop a sidewalk program to maintain, repair, or build new sidewalks in existing neighborhoods, and require sidewalks in new neighborhoods, concurrent with development.	Resilience, Equity, GHG: High	None identified.	Keep
N 4.9 Design neighborhoods for pedestrian safety.	Resilience, Equity, GHG: High	Consider combining with N 4.7.	Combine/consolidate
N 5: Increase the number of open gathering spaces, greenbelts, trails, and pedestrian bridges within and/or between neighborhoods.	Resilience, Equity, GHG: Medium	None identified.	Keep
N 5.3 Link neighborhoods with an open space greenbelt system or pedestrian and bicycle paths.	Resilience, GHG: Medium	Consider combining with N 4.6 and N 4.9.	Combine/consolidate

Selected Policies	Quality	Gap/Opportunity	Next Step
NE 13: Create a citywide network of paved trails, designated sidewalks, and soft pathways that link regional trails, natural areas, parks, sacred and historical sites, schools, and urban centers.	Resilience: High GHG: Low	None identified.	Keep
SH 2.4 Encourage a land use pattern that allows convenient access to daily goods and services, especially for those persons with limited mobility and/or transportation options.	Resilience: Low Equity, GHG: Medium	Easy access to services could improve resiliency to disruptive events, and reduces VMT.	Кеер
PRS 3: Work with other agencies to provide a convenient and pleasant open space related network for pedestrian and bicyclist circulation throughout the City of Spokane	Resilience, GHG: Medium	Bike/ped policies can support better mobility during emergencies as well as GHG reduction. Could reference or combine with the N 4.6 items about connectivity.	Amend
SH 4.1 Ensure that neighborhood facilities and programs are universally accessible.	Equity: High	Universal design should be goal for physical buildings. Inclusive programming could be incorporated for clarity.	Amend
SMP 3.13 Allow the expansion of existing rail corridors within the Shoreline Jurisdiction.	GHG: Low	Confirm that the rail expansion does not negatively impact the environment or environmental justice through construction effects, noise, and possible increase in GHG emissions from additional trail traffic or crossings.	Amend



Selected Policies	Quality	Gap/Opportunity	Next Step
TR GOAL B: Meet mobility needs by providing facilities for transportation options - including walking, bicycling, public transportation, private vehicles, and other choices.	Resilience, Equity, GHG: Low	Emphasize walking, biking, transit, etc. over private vehicles	Amend
TR GOAL F: Promote healthy communities by providing and maintaining a safe transportation system with viable active mode options that provides for the needs of all travelers, particularly the most vulnerable users.	Resilience, GHG: Low Equity: Medium	None identified.	Кеер
TR 3: Set and maintain transportation level of service standards that align desired growth patterns with optimal choices of transportation modes.	Resilience, Equity, GHG: Low	Current language does not explicitly tie to equity/GHG reductions, despite relationship. May not need to change if MMLOS standards address this.	Keep
TR 4: Evaluate TDM strategies to optimize transportation options within the context of Complete Streets. Use TDM strategies to gain efficiencies in the transportation system to reduce demand for auto travel.	Resilience; Low GHG: High	None identified.	Кеер
TR 5: Identify high-priority active transportation projects to carry on completion/ upgrades to the active transportation network.	Resilience, Equity, GHG: Low	Combine with below policy (TR 6).	Combine/consolidate

Selected Policies	Quality	Gap/Opportunity	Next Step
TR 6: Improve multi-modal transportation options to and within designated district centers, neighborhood centers, employment centers, corridors, and downtown as the regional center.	Resilience, GHG: Medium Equity: Low	Combine with above policy (TR 5).	Combine/consolidate
TR 7: Require developments to have open, accessible, internal multi-modal transportation connections to adjacent properties and streets on all sides.	Resilience; Low GHG: Medium	None identified.	Кеер
TR 8: Identify a freight network that respects needs of businesses as well as neighborhoods. Maintain an appropriate arterial system map that designates a freight network that enhances freight mobility and operational efficiencies, and increases the city's economic health. The needs for delivery and collection of goods at businesses by truck should be incorporated into the freight network, and the national trend of increased deliveries to residences anticipated.	GHG: Low	Tie back to GHG reductions by including a note on the ability of efficient freight movement as a critical piece of GHG reductions in the era of home delivery. Potential to mention fuel efficient/hybrid/electric trucks. Include language about VMT reductions.	Amend

Selected Policies	Quality	Gap/Opportunity	Next Step
TR 9: Focus on providing efficient and affordable multi-modal access to jobs, education, and workforce training to promote economic opportunity in the city's designated growth areas, develop "Great Streets" that enhance commerce and attract jobs.	Resilience; Medium Equity, GHG: Low	Add mention of focusing multimodal investment in marginalized and underserved communities.	Amend
TR 13: Maintain and follow design guidelines (including national guidelines such as MUTCD, NACTO, AASHTO) reflecting best practices that provide for a connected infrastructure designed for our climate and potential emergency management needs, and respecting the local context. Local context may guide signage and elements such as traffic calming, street furniture, bicycle parking, and community spaces. Accessibility guidelines and emergency management needs will be maintained.	Resilience, Equity, GHG: Low	This policy does not explicitly tie back to resilience, climate equity, or GHG reductions, despite design having an impact on all three. Potential to keep if restructured to relate back to climate.	Amend
TR 17: Identify and prioritize resources for paving existing dirt and gravel streets and alleyways to reduce air pollution and prioritize infill and economic development.	Resilience: Low	Tie infill development to resilience and efficiency such that VMT is reduced, and emissions follow.	Amend

Selected Policies	Quality	Gap/Opportunity	Next Step
TR 18: Develop and administer vehicle parking policies that appropriately manage the demand for parking based upon the urban context desired.		This policy can be flipped to describe avoiding excess parking that deters non-motorized transportation users.	Amend
TR 20: Coordinate bicycle and pedestrian planning to ensure that projects are developed to meet the safety and access needs of all users.	Resilience; Medium Equity: High GHG: Low	Combine with other bike and ped planning policies.	Combine/consolidate
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Land Objective 2. Trails for Park Access Add trails that connect residences, schools, and places with a high concentration of people to parks and recreation.	Resilience, GHG; Medium	It could specify high concentration but also parts of the city with minimal active transportation facilities, etc. Helps with resiliency for connecting to emergency hubs/heat refuges. Potential to combine with existing Parks Element policies. Cross reference to or consolidate with N 4.6 in Neighborhoods Element.	Combine/consolidate

Selected Policies	Quality	Gap/Opportunity	Next Step
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Land Objective 1. Offerings Reflect Our Mountain Landscape And Respond To Our Recreation And Park Use Trends In addition to special use parks and zones, there is a need for more dedicated bike trails, bike lanes and soft surface trails more evenly distributed throughout the city for recreation and commuting. A full list of proposed trails and supporting strategies can be found in Chapter 4.	Resilience; Medium Equity, GHG: High	Potential to combine with existing Parks Element or Neighborhood (N 4.6) policies. Likely the list will stay in separate Parks Plan.	Combine/consolidate
SMC 15.05.050 C. The City of Spokane shall assist the Spokane Regional Transportation Council, Spokane Transit Authority, and county and regional governments to transition to electric fleet and other renewable energy-powered public transit options.	GHG: Medium	Define "assist"	Amend, bring into comprehensive plan from another document.
SSAP: BE 5.2 Source renewable natural gas or green hydrogen for City fleet vehicles currently using compressed natural gas and expand to other heavy-duty vehicles	GHG: High	Currently underway, would be good to amend this to say renewable fuels and be less prescriptive in the solution	Amend, Bring into comprehensive plan from another document

Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: BE 5.3 Explore options to expand the use of compressed natural gas or green hydrogen in City owned vehicles where electricity is not a valid fuel option	GHG: Medium	"Explore" is vague. Consider combining with BE 5.2.	Amend, Combine/consolidate
SSAP: EP 3.3 Invest in and support public transit infrastructure that increases access to affordable and convenient transportation options	Equity, GHG: High	Need to define what invest in means for transit on City part - is it TOD, transit stop requirements for street frontages?	Amend
SSAP: TL 1 Advance land use planning to minimize vehicle miles traveled (VMT)	Resilience, Equity: Low GHG: High	Combine with other VMT related policies (like TL6). ⁵	Combine/consolidate
SSAP: TL 1.7 Prioritize development of peoplecentered neighborhoods that promote safe walking, biking, and transit, i.e. 15-minute neighborhoods	Resilience: High Equity: Medium GHG: Medium	Consolidate with similar policies such as N 4.6. ⁶ However, 15-minute neighborhood brings in places/uses and not just multimodal network.	Bring into comprehensive plan from another document; combine/ consolidate
SSAP: TL 5.6 Prioritize Transportation Systems Management Operations (TSMO) strategies before expanding transportation infrastructure	GHG: Medium	TSMO strategies can reduce the need to increase roadway width which in turn reduces induced demand of vehicular traffic as well as VMT and GHG emissions. Tie the policy back to GHG impact	Amend

⁶ N 4.6 Establish a continuous pedestrian and bicycle network within and between all neighborhoods.



 $^{^{5}}$ TL 6 by itself was seen as vague and reads "TL 6 Support existing & new programs to reduce VMT."

Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: TL 6.1 Work with regional partners to enhance and promote the commute trip reduction (CTR) program	GHG: High	Connect regional CTR to reducing SOV trips during peak hour. City manages CTR. Looks like it has not been updated since 2010. State CTR Board is supposed to support best practices. Consider if new best practices should be addressed.	Amend, Bring into comprehensive plan from another document
SSAP: TL 6.2 Work with employers to encourage telecommuting, video-conferencing, and active transportation as part of their CTR plans	Resilience, Equity: Low GHG: High	Connect regional CTR to reducing SOV trips during peak hour. See notes on TL 6.1.	Amend, Bring into comprehensive plan from another document
SSAP: TL 6.3 Apply per-ride tax to ride hailing apps, put into fund for active transportation projects	Resilience: Low Equity, GHG: Medium	None identified.	Keep
SSAP: TL 6.4 Promote e-bike adoption by working with private sector, state, and federal governments to provide incentives	Resilience: Low Equity, GHG: Medium	None identified.	Keep
SSAP: TL 7 Increase adoption rate of Zero Emission Vehicles (ZEVs) including electric bicycles	Resilience: Low GHG: High	Combine with ZEV adoption policies. Like TL 7.1, it could be good to make a broader goal about supporting reductions of fossil fuelbased transportation modes and that City leads by example like previous water conservation goals	Combine/consolidate



Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: TL 7.1 Work with regional partners to implement Avista's regional Transportation Electrification (TE) Plan	GHG: High	See TL 7 comments.	New measure
SSAP: TL 7.2 Plan and implement conversion of City fleet vehicles to carbonnegative, carbon neutral, and low carbon alternatives; by at least 50% by 2030; 75% by 2040 with a goal of reducing fleet well-to-wheel emissions to zero by 2050	GHG: High	See TL 7 comments.	New measure
SSAP: TL 7.3 Support regional education efforts including the launch of a regional Transportation Electrification Experience Center	GHG: Medium	None identified.	Keep
SSAP: TL 7.4 Support State & Federal Clean Fuel and ZEV legislation	GHG: Medium	Define how. Through lobbying or other approach?	Amend
SSAP: TL 7.5 Encourage ride- share companies to adopt ZEV fleets	GHG: Medium	See TL 7 comments.	Combine/consolidate, Amend
SSAP: TL 7.6 Include e-bikes in subsidy and trade-in programs	Resilience: Low Equity, GHG: Medium	None identified.	Keep
SSAP: TL 7.7 Encourage mode shift of freight, last mile delivery, and city fleet to bikes or electric bikes/cargo bikes or non-emitting vehicles, including autonomous vehicles (AV) where feasible	Resilience, Equity: Low GHG: Medium	Combine with other ZEV adoption policies.	Combine/consolidate



Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: TL 7.8 Evaluate and update City code to encourage electric vehicle charging infrastructure in new development	Resilience, Equity: Low GHG: Medium	Combine with below policy (TL 7.9).	Combine/consolidate
SSAP: TL 7.9 Establish electric vehicle charging criteria for installing chargers in the public right of way and launch a residential curbside electric charging project to promote EV charging infrastructure in all neighborhoods	Resilience, Equity: Low GHG: High	Combine with above policy (TL 7.8). Or revise to establish EV charging at distributed public facilities like libraries, schools, parks, to ensure all neighborhoods have access to EV charging or something.	Combine/consolidate, Amend
SSAP: Transportation: GOAL 4. Integrate Sustainability Action Plan goals, strategies, and actions into City planning TL 9 Ensure the City's process for approving development and service extensions addresses and prevents impacts to prime agricultural lands, critical wildlife habitats, and other natural areas in and around the city	Resilience: High	None identified.	Кеер

2.10 Waste Management

Six policies were evaluated regarding waste management. There are few such policies in the Spokane Comprehensive Plan, but the SSAP provides some opportunities to integrate more detailed approaches.

Exhibit 19. Waste Management Goals, Policies and Strategies Audit

Selected Policies	Quality	Gap/Opportunity	Next Step
CFU 5.5 Provide integrated, efficient, and economical solid waste management services in a manner that encourages and promotes waste reduction and recycling and minimizes environmental and public health impacts	Resilience: Medium Equity: Low GHG: Low	Include composting in policy. Align with the new WA state composting regulations when drafting amendment language.	Amend
ED 8.5 Facilitate the targeted clean-up of contaminated sites.	Resilience, Equity, GHG: Medium	Address role of federal and state agencies like Ecology. "Targeted" how? Cleaning up sites may improve resilience of communities to worsening air quality, and also prevent disturbances to contaminated soils. Consider addressing environmental justice as part of policy.	Amend
NE 5.3 Create and support legislation, education, and other means that reduce product packaging so that waste disposal is decreased.	GHG: Medium	None identified.	Keep

Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: EP 2.2 Create public, private partnerships to pilot programs for waste diversion including reducing food waste, expanding commercial composting, and developing programs to address hard to recycle materials	GHG: High	Amend to be less prescriptive by ending the text at "waste diversion;" then add in the goals of what waste diversion would achieve instead.	Bring into comprehensive plan from another document; amend.
SSAP: WD 1.3 Develop a residential food waste collection system to divert food waste from the Waste to Energy (WTE) plant by providing all residents with composting bins at no additional cost	GHG: High	Seems duplicative of previous composting goals and state regulations will already require composting elements too. Ensure plan addresses GMA mandate regarding "organic materials management."	Amend
SSAP: WD 3.4 Increase enforcement of curbside recycling contamination and fund seasonal carttagging programs for recycling	GHG: Medium	Seems more like an action item than a policy	Amend

2.11 Water Resources

22 policies or strategies were reviewed under Water Resources, and all but one in the SSAP appears below (was duplicative of others). There is an opportunity to update and consolidate these policies and strategies, especially regarding groundwater and considering climate hazards in stormwater management.

Exhibit 20. Water Resources Goals, Policies and Strategies Audit

Selected Policies	Quality	Gap/ Opportunity	Next Step
CFU 4: Provide public services in a manner that facilitates efficient and effective delivery of services and meets current and future demand.	Resilience: Medium	Opportunity to revise policy language to emphasize public services should minimize environmental impact and be more resource efficient.	Amend
CFU 5.2 Encourage public and private efforts to conserve water.	Resilience: Medium	Could tie with Objective 2 from Parks that the City would also be modeling that behavior.	Amend
CFU 5.3 Implement a Stormwater Management Plan to reduce impacts from urban runoff.	Resilience: Medium	Amend policy to indicate the Stormwater Management Plan may additionally serve on helping Spokane better prepare for extreme precipitation and urban flooding.	Amend
CFU 5.4 Protect, preserve, and enhance ground water resources through proactive, aggressive measures.	Resilience: Medium	Opportunity to strengthen the Policy's resiliency language. Define aggressive measures, such as being explicit about the type of work that has been done, like ensuring there are regular studies of aquifer related issues.	Amend
NE 1.2 Encourage the use of innovative stormwater techniques that protect ground and surface water from contamination and pollution.	Resilience: Medium	Address new stormwater design standards considering extreme precipitation events (sizing) and vegetation (extreme precipitation and drought).	Amend

Selected Policies	Quality	Gap/ Opportunity	Next Step
NE 1.3 Continue to support the regional watershed group in their efforts to conduct aquifer planning, allocating, monitoring, and study responsibilities for the entire watershed.	Resilience: High	Consider addressing climate trends and need to revisit water allocation and monitoring over time.	Amend
NE 1.6 Identify and preserve areas that have traditionally provided natural water drainage.	Resilience: Medium	Clarify type and location to consider how to preserve if not protected under critical area regulations. These areas could be essential related to extreme precipitation and flooding.	Amend
NE 2: Ensure all aquifers and water sources are not diminished below sustainable recharge or flow levels.	Resilience: Medium	Under goal consider adding policies regarding drought, snowpack and stream base flow. Could refer to WSP 2023 Appendix 2.2. Combine with the previous goals around aquifer studies too, or also like a GHG inventory but for the river, so some of regular reporting aspects.	Amend
NE 4.3 Continue efforts to reduce the rate of impervious surface expansion in the community.	Resilience: Medium	Consider addressing permeable pavement to reduce impervious surfaces rather than reducing the rate of it.	Amend

Selected Policies	Quality	Gap/ Opportunity	Next Step
PRS 1.2 Protect river and stream corridors as crucial natural resources that need to be preserved for the health, enjoyment and responsible use and access of the community, consistent with the Shoreline Master Program.	Resilience: Medium	Could likely combine with other water quality policies in NE Element to specify just what is being protected.	Combine/consolidate
SMP 1: Enhance the Spokane River and Latah Creek shorelines by establishing and implementing goals, policies, and regulations which promote a mixture of reasonable and appropriate shoreline uses that improve the City's character, foster its historic and cultural identity, and conserve environmental resources.	Resilience, Equity: Medium	Amend to prioritize the conservation of environmental resources and incorporating climate lens into the other possible Shoreline uses.	Amend
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Water Objective 2. Improve City- Wide Water Management Practices	Resilience: High	May tie with the water conservation encouragement or just be an action to accomplish that.	Bring into comprehensive plan from another document, Combine/consolidate
Develop a Drought Management Plan to outline a method for reducing water consumption within parks during drought conditions.			

Selected Policies	Quality	Gap/ Opportunity	Next Step
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Water Objective 2. Improve City-Wide Water Management Practices Identify improvements such as automated irrigation systems to reduce hand watering and permit overnight watering. This would also reduce staff time spent hand watering and increase time for other park maintenance work.	Resilience: High	Could tie with the water conservation encouragement or just be an action to accomplish that.	Bring into comprehensive plan from another document, Combine/consolidate
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Water Objective 2. Improve City-Wide Water Management Practices Utilize recycled water by implement natural landscaping to slow and filter rainwater runoff from impervious surfaces, such as demonstration rain gardens around park building sites or bioswales. These serve as a model to the community for practical stormwater management tactics as well as an opportunity to increase the amount of greenspace using limited to no water resources.	Resilience: High	Could combine with stormwater goal (NE1.2) and then use that framework of "serving as a model for the community" for the water conservation goals too.	Bring into comprehensive plan from another document, Combine/consolidate



Selected Policies	Quality	Gap/ Opportunity	Next Step
SSAP: NE 7.2 Reduce water and chemical inputs on City- maintained land, promoting water and wildlife conservation	Resilience: Medium	Add how you would reduce water/chemical inputs. Could combine with Parks Plan Objective 1.	Amend, Combine/consolidate
SSAP: TL 9.4 Review and update as necessary the City's water retail amendment process to prevent loss of critical wildlife habitat areas, wetlands, working farms, and prime agricultural lands (same as WR 6.5)	Resilience: High	Combine with WR 6.5	Bring into comprehensive plan from another document
SSAP: WR 1.1 Maintain minimum instream flow rule for the Spokane River through water conservation and drought action planning and policy	Resilience: Medium	Specify what drought action planning/policy is. Drought ordinance already covers this (SMC 13.04.1925) but it would be good to include a Comprehensive Plan level policy. It would not be about the City being able to control minimum instream flows, and thus it would need language amendment.	Amend
SSAP: WR 6 Work with regional partners to reduce pumping from the Spokane Valley Rathdrum Prairie (SVRP) Aquifer in the face of projected population growth and future climate	Resilience: High	Combine with Natural Environment aquifer policies.	Combine/consolidate, Bring into comprehensive plan from another document

Selected Policies	Quality	Gap/ Opportunity	Next Step
SSAP: WR 6.1 Fund and conduct a regional aquifer study to determine future impacts to water availability including impacts from climate change and projected growth aquiferwide and identify opportunities for regional collaborative solutions by 2023	Resilience: High	Combine with Natural Environment aquifer policies.	Combine/consolidate, Bring into comprehensive plan from another document
SSAP: WR 6.3 Adopt drought response plan that is tied to real-time Spokane River instream flows and hydrological health by April 2022 to prioritize maintaining water capacity during critical summer season	Resilience: High	Update date. Combine with WR 1.1 - drought ordinance already covers this (SMC 13.04.1925) would be good to include at a Comprehensive Plan level, although it would not be about the City being able to control minimum instream flows, and would need language amendment.	Amend, Combine/consolidate
SSAP: WR 11.2 Develop partnership with Washington Department of Ecology, Spokane County Conservation District, the Spokane Tribe of Indians, the Coeur d'Alene Tribe, and non-governmental organizations to restore shorelines of the Spokane River and its tributaries	Resilience: High	Seems similar to 4.4 but the tribal discussion could be good language to include since this project also includes tribal engagement that begins this kind of discussion.	Bring into comprehensive plan from another document, Combine/consolidate

2.12 Zoning & Development

The Spokane Comprehensive Plan and other documents address development patterns and standards to enhance the built environment. 62 goals, policies, and strategies were evaluated,



and 59 are listed below. The three not included are covered by other goals and policies. The recommendations include keeping policies and strategies, amending, or bringing in strategies from other plans.

Exhibit 21. Zoning & Development Goals, Policies and Strategies Audit

Selected Policies	Quality	Gap/Opportunity	Next Step
CFU 6.1 Provide capital facilities and utility services strategically in order to encourage and support the development of Centers and Corridors, especially in deteriorated areas of the city.	Equity: Medium	None identified.	Кеер
DP 2.2 Adopt regulations and design guidelines consistent with current definitions of good urban design.	GHG Reduction: Low	Opportunity to define what "good urban design" is. Add elements of climate resilience, equity, and GHG emission reduction to the definition. Also address new state laws on objective design standards.	Amend
DP 2.4 Incorporate flexibility into building design and zoning codes to enable neighborhood facilities to be used for multiple uses.	Resilience, GHG: Low	Ensure that building design is up to date with climate best available science on building material, design, and construction standards, including wildfire resistant construction. Specify what multiple uses are. Consider resilience hubs.	Amend

Selected Policies	Quality	Gap/Opportunity	Next Step
DP 2.6 Ensure that a particular development is thoughtful in design, improves the quality and characteristics of the immediate neighborhood, responds to the site's unique features - including topography, hydrology, and microclimate - and considers intensity of use.	Resilience, GHG: Low	Address potential for GHG reduction, and Environmental Justice.	Amend
H 1.11 Encourage housing that provides easy access to public transit and other efficient modes of transportation.	GHG: Medium	None identified.	Кеер
LU 1.3 Lower Intensity Residential Areas. Focus a range of lower intensity residential uses in every neighborhood while ensuring that new development complements existing development and the form and function of the area in which it is located.	GHG Reduction: Low	Could add to policy or discussion that housing diversity supports GHG reduction and environmental justice.	Amend
LU 1.4 Higher Intensity Residential Areas Direct new higher intensity residential uses to areas in and around Centers and Corridors designated on the Land Use Plan Map and to areas where existing development intensity is already consistent with development of this type.	Resilience, GHG: Medium	None identified.	Кеер

Selected Policies	Quality	Gap/Opportunity	Next Step
LU 1.6 Neighborhood Retail Use Direct new neighborhood retail use to Neighborhood Centers designated on the Land Use Plan Map.	Resilience, GHG: Medium	None identified.	Кеер
LU 3.2 Centers and Corridors Designate Centers and Corridors (neighborhood scale, community or district scale, and regional scale) on the Land Use Plan Map that encourage a mix of uses and activities around which growth is focused.	Resilience, GHG: Medium	None identified.	Keep
LU 3.5 Achieve a proportion of uses in Centers that will stimulate pedestrian activity and create mutually reinforcing land uses.	Resilience, GHG: High	None identified.	Keep
LU 3.8 Encourage shared parking facilities for business and commercial establishments that have dissimilar peak use periods."	Resilience, GHG: High	None identified.	Keep

Selected Policies	Quality	Gap/Opportunity	Next Step
LU 4.1 Coordinate land use and transportation planning to result in an efficient pattern of development that supports alternative transportation modes consistent with the Transportation Chapter and makes significant progress toward reducing sprawl, traffic congestion, and air pollution.	Resilience, GHG: High	None identified.	Кеер
LU 4.2 Land Uses That Support Travel Options and Active Transportation Provide a compatible mix of housing and commercial uses in Neighborhood Centers, District Centers, Employment Centers, and Corridors.	Resilience, GHG: High	None identified.	Keep
LU 4.4 Connections Form a well-connected network which provides safe, direct and convenient access for all users, including pedestrians, bicycles, and automobiles, through site design for new development and redevelopment.	Resilience, GHG: High Equity: Medium	None identified.	Кеер
LU 4.5 Block Length Create a network of streets that is generally laid out in a grid pattern that features more street intersections and shorter block lengths in order to increase street connectivity and access.	GHG: Low	Include that street connectivity will prioritize street uses that produce the least amount of GHG, like transit, bikes, walking, etc. Explicitly call out VMT reduction as a part of this.	Amend



Selected Policies	Quality	Gap/Opportunity	Next Step
LU 5.1 Built and Natural Environment Ensure that developments are sensitive to the built and natural environment (for example, air and water quality, noise, traffic congestion, and public utilities and services), by providing adequate impact mitigation to maintain and enhance quality of life.	Resilience: Medium Equity: Low	Could also reference environmental justice.	Amend
N 5.2 Include a park and/or square in each neighborhood center.	Resilience, Equity: High	None identified.	Keep More parks may lower GHG in communities.
LU 5.4 Ensure development is accomplished in a manner that protects significant natural features and wildlife habitat.	Resilience, GHG: Medium	None identified.	"Significant natural features" includes trees, which provide carbon sequestration benefit.
LU 6.1 Identify, in advance of development, sites for parks, open space, wildlife habitat, police stations, fire stations, major stormwater facilities, schools, and other lands useful for public purposes.	Resilience, GHG: Medium	None identified.	Keep
LU 6.2 Identify, designate, prioritize, and seek funding for open space areas.	Resilience, GHG: Medium	Could specify "particularly to enhance habitat connectivity and provide open space in areas with low access"	Amend



Selected Policies	Quality	Gap/Opportunity	Next Step
LU 6.3 Work with the local school districts to identify school sites that are located to serve the service area and that are readily accessible for pedestrians and bicyclists.	GHG: Medium	None identified.	Keep
LU 6.5 Encourage school officials to retain existing neighborhood school sites and structures because of the importance of the school in maintaining a strong, healthy neighborhood.	Resilience: Medium	None identified.	Keep Schools can also function as emergency hubs, and build resilience in the form of social networks.
LU 7.3 Allow compatible residential or commercial use of historic properties when necessary to promote preservation of these resources.	Resilience, GHG: Medium	None identified.	Keep Makes it more realistic that historic properties will be maintained in good condition, which can improve resiliency. Also reduces emissions of new construction.
N 2.2 Develop neighborhoods that enable citizens to live, work, shop, socialize, and receive other essential services within their neighborhood.	Resilience, GHG: High Equity: Medium	None identified.	Keep
N 3.1 Work with neighborhoods to develop a strategy for the multipurpose use of existing structures and the extension of services within neighborhoods for neighborhood activities.	Resilience, GHG: Low	Consider addressing resilience hubs. Combine with other similar policies in CFU or LU elements.	Combine/consolidate



Selected Policies	Quality	Gap/Opportunity	Next Step
N 4.4 Ensure that the size of a neighborhood business is appropriate for the size of the neighborhood it serves so that trips generated by non-local traffic through the neighborhood are minimized.	Resilience, Equity, GHG: Medium	None identified.	Keep
N 5.2 Include a park and/or square in each neighborhood center.	Resilience, Equity: High	None identified.	Keep More parks may lower GHG in communities.
N 6: Protect and enhance the natural and built environment within neighborhoods.	Resilience, Equity: Medium	None identified.	Keep
N 6.1 Protect the natural and built environment within neighborhoods.	Resilience: Medium Equity: Low	None identified.	Кеер
N 7: Promote efforts that provide neighborhoods with social amenities and interaction and a sense of community.	Resilience, Equity: Medium	None identified.	Keep
N 7.1 Increase the number of public gathering places within neighborhoods	Resilience; Medium	Could specify "to create opportunities for social connection, and also serve as resilience hubs during emergencies" or have a different policy on hubs	Amend
NE 19.2 Conduct a reassessment of the 100-year flood plain in areas with a history of flooding.	Resilience: Medium	Address trends of a changing climate to ensure reassessment study boundaries capture any areas of increased potential impact.	Amend



Selected Policies	Quality	Gap/Opportunity	Next Step
NE 19.4 Discourage development and redevelopment of habitable structures that are within the 100-year flood plain.	Resilience: Medium	Consider increasing to 500-year.	Amend
NE 7.4 Continue to designate unstable slopes as not suitable for development.	Resilience: Medium	Consider identifying areas of potential increased risk due to extreme precipitation.	Amend
NE 7.5 Integrate the protection of slopes with wildlife corridor and natural area designations and acquisitions.	Resilience: High	Consider identifying areas of potential increased risk due to extreme precipitation.	Amend
PRS 1.3 Purchase open space and shoreline land when they become available using funding sources available.	Resilience, GHG: Medium	None identified.	Keep
PRS 1.6 Create an "Opportunity Fund" to protect open space or acquire parkland, which would be lost if not immediately purchased.	Resilience, GHG: High	Could combine with PRS 1.3.	Combine/consolidate
PRS 4: Recognize and update Spokane's existing park resources by continuing the park preventative maintenance program.	Resilience: Medium	Could be modified to specify "to improve the longevity of our park assets and make them resilient to extreme weather" or similar	Amend
SMP 5.2 Give priority to recreational development, both commercial and public, for access to and use of the water and shorelines.	Resilience: Low	None identified.	Keep Indirectly related to climate planning, such as green infrastructure.



Selected Policies	Quality	Gap/Opportunity	Next Step
SMP 6.1 Prohibit development within the shorelines that would intensify flood hazards or result in cumulative significant adverse effects to other properties, as regulated by Chapter 17E.030, Floodplain Management, of the Spokane Municipal Code.	Resilience: High	None identified.	Keep
TR GOAL C: Promote land use patterns and construct transportation facilities and other urban features that advance Spokane's quality of life.	Resilience, GHG: Medium Equity: Low	Discuss the ability land use has in affecting resilience/equity/GHG reductions.	Amend
TR GOAL G: Design and maintain a fiscally efficient, environmentally responsible, and socially equitable transportation system that serves its users through coordinated planning and budgeting with other partners and utilities.	Equity: High GHG: Medium	None identified.	Keep

Selected Policies	Quality	Gap/Opportunity	Next Step
TR 12: Prioritize investments based on the adopted goals and priorities outlined in the comprehensive plan.	Resilience, Equity, GHG: Medium	This policy would address these topics as long as the goals align. Combine with other policies that refer to aligning with citywide goals. See notes on IS 3.5; also, may be able to amend into the budget process goal IS 3.4. Seems to be targeted at stating that the climate impacts and climate justice work needs to be prioritized in funding so likely some rewording needed.	Combine/consolidate
Spokane Parks and Natural Lands Master Plan Reduce Water Need Objective 1. Reduce Water Needs Replace turf with synthetic fields and/or organic and hardscape materials such as drought-tolerant plants, mulch, decomposed granite, gravel and permeable pavers.	Resilience; High	Could combine with water conservation goal and then use that framework of "serving as a model for the community" for the water conservation goals too.	Bring into comprehensive plan from another document; combine/ consolidate

Selected Policies	Quality	Gap/Opportunity	Next Step
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Legacy Objective 2. Put The Park Back Into Parkway Boulevards Complete pilot projects for two parkways to demonstrate different landscape treatments for improved appearance and sustainability and install walking paths.	Resilience, Equity: High	None identified.	Keep Retain in Parks Master Plan.
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Land Objective 3. Focus On Neighborhood And Community Parks Develop a Community Parks Initiative to complete a comprehensive investment in smaller parks. The investment includes capital improvements, expanded recreation programming, increased maintenance and gardening staff, and capacity building in partnership with local community groups.	Resilience, Equity: High	Includes collaboration with community groups to invest in parks. Potential to combine with existing Parks Element policies.	Combine/consolidate

Selected Policies	Quality	Gap/Opportunity	Next Step
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Land Objective 5. Enhance Our Natural Lands With Projects To Restore Ecologies And Build Resilience To Natural Disasters Develop climate adaptation strategies and land management practices for natural lands that support environmental quality and resilience.	Resilience: High	Like NE 11.3; consider combination.	Bring into comprehensive plan from another document, Combine/consolidate
Spokane Parks and Natural Lands Master Plan Opportunities For Improvement: Legacy Objective 1. Replace Aged Facilities Standardize maintenance practices and materials to ensure all parks receive the same level of care regardless of location. Ensure facilities are in operating condition, such as restrooms and drinking fountains, where present. In parks where these facilities are not available, capital and maintenance funding will be needed to ensure park users have access to them	Resilience, Equity: Medium	Access to water fountains, safe parks could be essential during heat events (particularly for unhoused people). General maintenance could also prevent damage during extreme weather. Potential to combine with existing Parks Element policies.	Combine/consolidate



Selected Policies	Quality	Gap/Opportunity	Next Step
Section 15.05.060 Climate Action Progress Reports A. The City shall provide a progress report on the 100% renewable energy and greenhouse gas emissions reduction goals every three years and a comprehensive report that includes reductions to date and the status of reaching the established targets every three years.	GHG: High	This is just a requirement to create/implement an emissions mitigation plan. Would need to be reworded to align with new CRSB goals. It would be best if a Climate Action Plan comes from the new Comprehensive Plan goals that list out the actions necessary to achieve mitigation and adaptation goals for the 5-year progress report so the entire process is integrated. Reflect Climate Resilience and Sustainability Board goals/CAP.	Amend, Bring into comprehensive plan from another document
Climate Action Progress Reports B. If the City of Spokane is not reaching the 100% renewable energy or greenhouse gas emissions reduction goals, the City shall conduct an analysis of strategies and actions to get the City on track to meet the adopted climate goals. These strategies and actions shall be evaluated to ensure they do not disproportionately burden low-income families, include community-wide investment, and are prioritizing equitable implementation.	Equity, GHG: High	Same as above with 15.05.060.A.	Amend, Bring into comprehensive plan from another document



Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: BE 1.3 Require installed electric hookup options for all appliances in new construction	GHG: High	Align with building codes. Goal/building code should have specific requirements to ensure breaker box is set up for these things since that is the first step holdback typically.	Amend
SSAP: HW 2.1 Continue to invest in affordable housing, low-barrier housing, and safe, accessible, affordable public transportation	Resilience, Equity, GHG: Medium	Be more specific about how/where to invest. Could consider/combine in Neighborhoods Element to address this overlapping issue.	Amend
SSAP: HW 2.2 Fund grants for sustainable home upgrades that benefit resident health and transition renters to improved housing	Resilience: Medium GHG: Low	Be more specific about what sustainable home upgrades, add climate focus, define improved housing. Could put under overarching goal regarding resource conservation. There are other entities that lead these efforts (SNAP, Utilities).	Amend
SSAP: TL 1.4 Increase parking lot tree coverage requirements (alt: solar panel)	Resilience: High GHG: Medium	Some focus on parking lots and heat islands could be included, and would need to be more fleshed out.	Bring into comprehensive plan from another document
SSAP: TL 1.10 Build awareness on how density and effective land use help meet sustainability goals	Resilience, GHG: Medium Equity: Low		Bring into comprehensive plan from another document
SSAP: Strategy 1. Ensure new construction is as efficient as possible and ready to utilize renewable energy	Resilience, GHG: Medium	Perhaps already addressed through energy code (at least first half of strategy). Promote incentives to be solar ready.	Bring into comprehensive plan from another document, Amend



Selected Policies	Quality	Gap/Opportunity	Next Step
SSAP: Strategy 9. Ensure the City's process for approving development and service extensions addresses and prevents negative impacts to prime agricultural lands, critical wildlife habitats, and other natural areas in and around the city	Resilience: Medium	None identified.	Keep

3 Environmental Code Audit

Spokane Municipal Code (SMC) sections addressing Critical Areas and Shorelines were reviewed by Parametrix regarding resiliency, GHG mitigation, and equity including SMC 17E.010, 020, 030, 040, 070 (critical areas) and 060 (shorelines). Critical areas regulated in Spokane include fish and wildlife habitat conservation areas (FWHCA), wetlands, critical aquifer recharge areas, floodplains, and geologic hazards. Shorelines include the Spokane River and Latah Creek and uplands generally within 200 feet and any associated wetlands.

Strength of Current Shoreline and Critical Area Regulations

General findings regarding the strength of current regulations include:

- <u>Chapter 17E.060</u> Shoreline Regulations was updated in 2021 and is generally current with expected standards.
- Critical areas regulations in SMC 17E.010, 020, 030, 040, 070 are fairly current with some parts updated as recently as 2021.
- Section 17E.020 FWHCA: Spokane has fairly large riparian buffers similar to the State Department of Fish and Wildlife's site potential tree height recommendations which is supportive of climate planning.
 - Section 17E.020.120 Incentives and Stewardship Options for FWHCA: The City could consider similar incentives (tax incentives, stewardship options) in other sections of the critical areas ordinance.
 - Section 17E.030 Floodplain Management: Consider adding development restraints for within the 500-year floodplain.

Critical Areas Regulations Recommendation - Aquifer Recharge Areas

A specific suggestion to improve critical areas regulations includes:

 Review section 17E.010 Critical aquifer recharge area for additional protection such as addressing demands on aquifer for uses as temperature increases. Consider recent aquifer recharge studies.

Process Findings

Process related findings include:

- Review the Code again after policy recommendations are made for opportunities to codify policies.
- Review 2023 tree protection plan for climate resilience planning purposes, in a follow up audit or implementation activity:
 https://static.spokanecity.org/documents/urbanforestry/treefacts/arboricultural-specifications-2023-08-10.pdf

Climate Mitigation, Adaptation, and Equity Recommendations and Findings

Findings related to Resiliency, Equity, and GHG reduction specifically include:

- Resiliency: The City could address the following in future code amendments to strengthen resilience:
 - Incorporate adaptive management in critical area and shoreline code, particularly as it relates to mitigation (17E.020.090, 17E.060, 17E.070.130). Monitoring and adaptive management is encouraged in WAC 365-195-905(6). Adaptive management is the process of monitoring and improving permits, regulations, and programs to ensure the protection of critical areas.
 - Consider adding to the critical areas regulations, similar code to what is in the shoreline regulations for limiting clearing and minimizing soil disturbance
- **Equity:** There may be opportunities to codify policy recommendations to favor improvements to wetland or FWHCAs in areas of the city with vulnerable populations and areas that have been disproportionately affected by climate related hazards.
- **GHG Emissions Reductions:** Critical areas and shorelines regulations can promote more trees or protection of trees which can indirectly help with GHG emissions reductions.

4 Next Steps

After completion of this document and a detailed policy matrix, draft policies will be prepared for review by advisory bodies and the public and tribes. Eventually Spokane's climate mitigation and resilience goals and policies would be integrated into the Spokane Comprehensive Plan Periodic Update due in 2026.