City of Spokane

Comprehensive Plan Periodic Update 2026-2046 Draft Environmental Impact Statement

December 2025

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Date: December 18, 2025

Subject: Draft Environmental Impact Statement for the City of Spokane Comprehensive Plan Periodic Update

Dear Reader:

The City of Spokane is preparing a periodic update to the City's Comprehensive Plan for 20 years, from 2026 to 2046. The City's Comprehensive Plan was last updated in 2017. The Comprehensive Plan helps the City manage growth, provide housing and job opportunities, plan for services and infrastructure (e.g., streets, stormwater, parks), and more.

Each chapter of the plan, except for the Shorelines Chapter, will be updated to address new growth targets for population and jobs, and to meet changes to the Growth Management Act (GMA) since 2017 including considerations around Climate Planning and Planning for Housing at all income levels.

The Land Use Plan Map may be amended to create more housing and job opportunities and respond to growth targets, community needs, transportation investments, and environmental conditions. Zoning and other development regulations may also be amended to implement the Land Use Plan Map. Critical Area regulations will be evaluated, and recent state planning rules will be addressed.

The Draft EIS presents three alternatives to test different growth patterns and policies. Alternative 1 "Stay the Course" would maintain the current comprehensive plan and code. It was developed in prior years with different growth targets and different state expectations. This alternative includes analysis of "middle housing" changes adopted by the city in 2023.

Two action alternatives are evaluated. They are designed to meet current state requirements (including new housing, climate, and other requirements), create the opportunity for housing at all income levels, accommodate jobs, and update policies and codes to streamline them and facilitate growth. Alternative 2 Distributed & Balanced adds greater housing and job intensity along frequent transit routes and prioritizes a jobs/housing balance. Alternative 3 Center City & Regional Hubs focuses both jobs and housing growth in regional hubs and connections between them, particularly Center City, and connects regional hubs like West Plains and Hillyard via I90 and the North Spokane Corridor.

The Draft EIS considers the impacts of the alternatives towards: earth, water quality, and water resources; air quality and greenhouse gas emissions; plants and animals, including critical areas and habitat; land use patterns and urban form, including historic and cultural resources; relationship to plans, policies, and regulations; population, employment, and housing; transportation, including multiple modes and city and state facilities; public services including police, fire and emergency medical services, parks, schools, libraries, and solid waste; and utilities including power, water, wastewater, and stormwater.

Key environmental issues and options facing City decision makers include:

- Development of a growth concept and goals and policies that implement the plan's vision and objectives for a vibrant, resilient, and inclusive city by supporting economic growth, environmental stewardship, and the diverse needs of the whole community,
- Providing a clarified and simplified plan and regulations that accommodate housing and job growth including fast-track permitting of desired growth and protect the environment including critical areas.
- Approval of a comprehensive plan and development regulations that meet GMA requirements to accommodate housing needs at all income bands and address racially disparate impacts in access to housing.
- Approval of a comprehensive plan that provides land use and transportation strategies to reduce greenhouse gas emissions.
- Approval of a comprehensive plan that increases resilience to climate-related hazards, reduces exposure to pollution, and addresses environmental impacts.

The City of Spokane is requesting comments from the public, agencies, Tribes, and all interested parties on the Draft EIS from December 18, 2025, to February 18, 2026. Comments are due by **5:00 PM, February 18, 2026**. Comments can be provided to:

Tirrell Black, Assistant Planning Director
City of Spokane
808 W. Spokane Falls Blvd
Spokane, WA 99201
509.625.6185 | PlanSpokane@spokanecity.org

Please see the Fact Sheet for further information on how to provide your comments. Thank you for your interest in the future of the City of Spokane.

Sincerely,

Spencer Gardner, Director, Planning Services

Fact Sheet

Project Title

City of Spokane Comprehensive Plan Periodic Update known as PlanSpokane 2046

Proposed Action and Alternatives

The City of Spokane is preparing a periodic update to the City's Comprehensive Plan for a horizon of 20 years, from 2026 to 2046. The City's Comprehensive Plan was last updated in 2017. The Comprehensive Plan helps the City manage growth, provide housing, and job opportunities, conserve natural and cultural resources, plan for services and infrastructure (e.g., streets, stormwater, parks), and more.

Most chapters of the plan will be updated to address new growth targets for population and jobs, and to meet changes to the Growth Management Act (GMA) since 2017, including considerations around Climate Planning and Planning for Housing at all income levels.

The Land Use Plan Map will be amended to create more housing and job opportunities and respond to growth targets, community needs, transportation investments, and environmental conditions. Zoning and other development regulations will also be amended to implement the Land Use Plan Map. Critical area regulations will be evaluated and recent state planning rules addressed.

The City is considering tools to facilitate environmental review under the State Environmental Policy Act (SEPA), including a planned action (RCW 43.21c.440) for subareas such as transit corridors or employment and mixed-use centers, housing development categorical exemptions (RCW 43.21c.229), or raising minor new construction thresholds (WAC 197-11-800(1)(c) and (d)).

The City is studying three Alternatives for the Comprehensive Plan:

- **Alternative 1, Stay the Course:** This SEPA required Alternative (**No Action Alternative)** is the continuation of the current Comprehensive Plan and associated zoning and regulations.

- Under this Alternative, the Comprehensive Plan and development regulations would not be updated. However, growth would still occur under this alternative under current rules—it does not assume zero growth over time.
- Alternative 1 has capacity to meet total housing and population targets but would not provide sufficient capacity for housing at income levels 0-80% of the area median income (AMI, as determined by the Federal Housing and Urban Development Department for Spokane County.
- This Alternative assumes jobs would grow consistent with regional Spokane Regional Transportation Council (SRTC) projections.

- **Alternative 2, Distributed and Balanced: Alternative 2** adds greater housing and job intensity along frequent transit routes.
  - Alternative 2 applies recommendations from the adopted Centers and Corridors Study (2024) to better consider market conditions and zoning best practices, including the use of mixed-use land use and/or zoning designations.
  - Alternative 2 provides sufficient capacity to meet housing and population targets, including creating greater capacity of housing types that are affordable to all income levels.
  - To evaluate the phasing of infrastructure needs, Alternative 2 would have a job growth level similar to State Employment Security Department trends.
  - Alternative 2 prioritizes a balance between the numbers of jobs and housing (also known as a jobs/housing balance).
  - Alternative 2 encourages neighborhood/small scale retail.
  - Alternative 2 simplifies the land use plan so that there are fewer land use designations, which are then implemented by multiple zones.
  - Alternative 2 facilitates growth through an infill exemption under SEPA (RCW 43.21c.229), where the Environmental Impact Statement (EIS) provides upfront evaluation of residential and mixed-use growth along frequent transit routes, and documents plans or development regulations that provide mitigation measures. The City may also raise SEPA thresholds citywide (WAC 197-11-800) or in targeted areas in the city.
  - Alternative 2 includes anticipated climate resilience and greenhouse gas reduction goals and policies per House Bill (HB) 1181. It would also review and update critical areas regulations.
- **Alternative 3, Center City and Regional Hubs:** Alternative 3 adds greater housing and job intensity in the City of Spokane's downtown vicinity called the "Center City" and in employment centers in Southwest and Northeast Spokane.
  - Alternative 3 focuses housing growth in regional hubs, particularly Center City and selected corridors. Under Alternative 3, city investments prioritize certain centers and major corridors to maximize impact of designation. Designations in other areas are removed or modified where appropriate, while still considering livability/streetscape improvements.
  - Alternative 3 concentrates industrial jobs in West Plains and Northeast Spokane and additional education/health jobs in the City Center and University areas.
  - Alternative 3 provides sufficient capacity to meet housing and population targets, including creating greater capacity of housing types that are affordable to all income levels.

- Alternative 3 establishes the highest jobs allocation that focuses investments in areas with existing/planned transportation infrastructure (Downtown transit and street network, airport, rail corridors, North Spokane Corridor or NSC).
- Like Alternative 2, Alternative 3 simplifies the land use plan so that there are fewer land use designations, which are then implemented by multiple zones.
- Like Alternative 2, Alternative 3 facilitates growth through an infill exemption (RCW 43.21c.229) along frequent transit routes, particularly bus rapid transit. Infill exemption areas would be focused areas for residential and mixed-use development. The City may also raise SEPA thresholds citywide (WAC 197-11-800) or in targeted areas in the city.
- Like Alternative 2, Alternative 3 includes anticipated climate resilience and greenhouse gas reduction goals and policies per HB 1181. It would also review and update critical areas regulations.

Proponent and Lead Agency

City of Spokane

Location

The Comprehensive Plan primarily addresses the Spokane city limits. Secondarily the plan addresses unincorporated urban growth areas and utility service areas abutting the city.

Tentative Date of Implementation

December 2026

Responsible SEPA Official

Spencer Gardner, Director, Planning Services
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Contact Person

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509.625.6185 | PlanSpokane@spokanecity.org

Required Approvals

All Comprehensive Plan amendments and implementing regulations require a 60-day review by the State of Washington Department of Commerce and other state agencies.

All transportation elements require a 60-day review by the Spokane Regional Transportation Council, acting as both the Regional Transportation Planning Organization and the Metropolitan Transportation Planning Organization for the region.

Locally, PlanSpokane 2046 and associated regulatory updates will be considered by the Spokane Plan Commission and its recommendations will be forwarded to the Spokane City Council who will deliberate and determine approval.

Following City Council approval, the City of Spokane Mayor must sign the related ordinance(s) for final adoption to occur.

Principal EIS Authors and Contributors

Under the direction of the Planning & Economic Development Department of the City of Spokane, the consultant team prepared the EIS as follows:

- BERK Consulting: Prime consultant; alternatives; land use patterns and urban form; relationship to plans, policies, and regulations; population, employment, and housing; public services.
- Cascadia Consulting Group: Air quality/Greenhouse gas; public engagement.
- Fehr & Peers: Transportation.
- Kauffman and Associates: Cultural and natural resources; Tribal engagement.
- Parametrix: Earth, water quality, water resources; plants and animals; utilities (power, water, wastewater, and stormwater)

Draft EIS Date of Issuance

December 18, 2025

Draft EIS Comment Period

Comment Period

The City of Spokane is requesting comments from the public, agencies, Tribes, and all interested parties on the Draft EIS from **December 18, 2025 to February 18, 2026**. Comments are due by **5:00 PM, February 18, 2026**.

All written comments should be directed to:
Tirrell Black, Assistant Planning Director
City of Spokane
808 W. Spokane Falls Blvd
Spokane, WA 99201
509.625.6185 | PlanSpokane@spokanecity.org

Submittal of comments by email is preferred. Please include in the subject line "PlanSpokane 2046 Draft EIS Comments."

Public Comment Opportunities

A series of public and agency workshops are planned during the Draft EIS comment period.

A hybrid **Agency and Tribes Workshop** is scheduled for **Tuesday, January 6, 2026** from 9:30-11:30 a.m. at Spokane City Hall, City Council Briefing Center (Lower Floor). Attendees are encouraged to attend in person if possible; if needed, a virtual Teams link is available. Please contact the Contact Person above.

Members of the public are encouraged to attend **Community informational and listening sessions** scheduled for January and February 2026.

- Virtual Lunch and Learn: When: January 13, 12 to 1 p.m. Where: Teams meeting, link on project webpage
- PlanSpokane Listening Hours
  - Session 1—When: January 20, 11 a.m. to 1 p.m. Where: Spokane City Hall, Tribal Room (Lobby)
  - Session 2—When: February 3, 4 to 6 p.m. Where: Hillyard Library, Events Room
  - Session 3—When: February 5, 3 to 6 p.m. Where: Liberty Park Library, Study Room A
  - Session 4—When: February 10, 4 to 6 p.m. Where: Shadle Park Library, Studio Room
  - Session 5—When: February 12, 4 to 6 pm Where: South Hill Library, Study Room A

More information can be found at https://my.spokane.edu/planspokane/draft-eis.

Date of Final Action

Up to December 2026

Prior Environmental Review

This EIS builds on prior evaluation of the 2017 Shaping Spokane Comprehensive Plan. That environmental review is contained in a 2017 EIS Addendum to the 2001 Draft Comprehensive Plan Update EIS, which is available at https://static.spokanecity.org/documents/shapingspokane/draft-plan/volume2-comp-plan-tech-data.pdf.

Location of Background Data

You may review the City of Spokane website for more information at my.spokanecity.org/planspokane/. If you desire clarification or have questions, please see the contact person above.

Purchase/Availability of Draft EIS

The Draft EIS is posted on the City of Spokane website at: https://my.spokanecity.org/planspokane/draft-eis.

This Draft EIS is also available for review at:
Spokane City Hall
808 W. Spokane Falls Blvd
Spokane, WA 99201

Printed versions are available at cost from the City.

Distribution List

A notice of availability of the Draft Environmental Impact Statement (EIS) was published and distributed to agencies, Tribes, and organizations.

Federal and Tribal Agencies

Coeur D'Alene Tribe

Confederated Tribes of the Colville Reservation

Kalispel Tribe of Indians

Spokane Tribe of Indians

U.S. Army corps of Engineers

State and Regional Agencies

Department of Archaeology & Historic Preservation

Department of Commerce

Department of Ecology

Department of Fish & Wildlife

Department of Natural Resources

Department of Transportation

Spokane Regional Clean Air Agency

Spokane Regional Transportation Council

Adjacent Jurisdictions

Spokane County

City of Airway Heights

City of Spokane Valley

Services, Utilities, and Transit

Airway Heights Water

American Medical Response

Avista Utilities

Bonneville Power Administration

Cheney School District

District 81 Capital Projects

Fairchild AFB

Fire District 3

Fire District 8

Fire District 9

Fire District 10

Four Lakes Water District

Inland Power

Mead School District Facilities & Planning

Medical Lake Water

North Spokane Irrigation District #8

Spokane Airports

Spokane Aquifer Joint Board

Spokane County Water District 3

Spokane Regional Health District

Spokane Transit Authority

Whitworth Water

Williams Northwest Pipeline

Community, Organizations, Media

American Indian Community Center

Downtown Spokane Partnership

East Sprague Parking and Business Improvement Area

Native Project

Neighborhood Councils
Northeast PDA
S3R3
Spokane Riverkeeper
Spokane Tribal Network
Spokane University District
The Spokesman-Review
Upper Columbia United Tribes

City of Spokane

Asset Management
Building Department
City Attorney
City Treasurer & City Taxes & Licenses
Code Enforcement
Construction Management
Engineering Services
Fire Department
GIS
Historic Preservation
Integrated Capital Management
Library Services
Neighborhood Services
Parks Department
PIES
Planning & Development
Police Department
Public Works
Solid Waste
Street Operations
Wastewater Management
Water Department

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Contents

1 Summary 1-1

1.1 Purpose 1-2
1.1 Public Comment Opportunities 1-5
1.2 Objectives, Proposal, and Alternatives 1-5
1.3 Key Issues and Options 1-13
1.4 Summary of Impacts and Mitigation Measures 1-13
1.4.1 Earth, Water Quality, and Water Resources 1-16
1.4.2 Air Quality/Greenhouse Gases 1-18
1.4.3 Plants and Animals 1-21
1.4.4 Land Use Patterns and Urban Form 1-23
1.4.5 Population, Employment, and Housing 1-27
1.4.6 Relationship to Plans, Policies, and Regulations 1-30
1.4.7 Transportation 1-32
1.4.8 Public Services 1-41
1.4.9 Utilities 1-44

2 Proposal and Alternatives 2-1

2.1 Introduction 2-2
2.1.1 Overview of the Proposal 2-2
2.1.2 Alternatives 2-2
2.1.3 Study Area 2-4
2.1.4 Objectives of the Proposal 2-8
2.2 Planning Context 2-9
2.2.1 Growth Management Act 2-9
2.2.2 Comprehensive and Subarea Planning 2-10
2.2.3 Growth Targets and Alternatives 2-13
2.2.4 PlanSpokane Policies and Regulation Proposals 2-20

2.3 Public Outreach 2-22
2.3.1 Visioning and Scoping Period 2-22
2.3.2 Draft Comprehensive Plan and Draft EIS Engagement 2-24
2.4 Proposed Action and Alternatives 2-25
2.4.1 Alternative Comparison 2-25
2.4.2 Alternative 1: No Action, Stay the Course 2-27
2.4.3 Alternative 2: Distributed and Balanced 2-32
2.4.4 Alternative 3: Center City and Regional Hubs 2-36
2.4.5 Future Alternatives 2-40
2.5 SEPA Process 2-40
2.6 Benefits and Disadvantages of Delaying the Proposed Action 2-41

3 Environment, Impacts, and Mitigation Measures 3-1

3.1 Earth, Water Quality, and Water Resources 3-3
3.1.1 Affected Environment 3-3
3.1.2 Impacts 3-24
3.1.3 Mitigation Measures 3-30
3.1.4 Significant Unavoidable Adverse Impacts 3-32
3.2 Air Quality and Greenhouse Gas Emissions 3-33
3.2.1 Affected Environment 3-34
3.2.2 Impacts 3-44
3.2.3 Mitigation Measures 3-50
3.2.4 Significant Unavoidable Adverse Impacts 3-53
3.3 Plants and Animals 3-54
3.3.1 Affected Environment 3-54
3.3.2 Impacts 3-70
3.3.3 Mitigation Measures 3-73
3.3.4 Significant Unavoidable Adverse Impacts 3-78
3.4 Land Use Patterns and Urban Form 3-79
3.4.1 Affected Environment 3-79
3.4.2 Impacts 3-118
3.4.3 Mitigation Measures 3-127
3.4.4 Significant Unavoidable Adverse Impacts 3-131
3.5 Population, Employment, and Housing 3-133
3.5.1 Affected Environment 3-134
3.5.2 Impacts 3-163
3.5.3 Mitigation Measures 3-184
3.5.4 Significant Unavoidable Adverse Impacts 3-190
3.6 Relationship to Plans, Policies, and Regulations 3-191
3.6.1 Affected Environment 3-191
3.6.2 Impacts 3-215

3.6.3 Mitigation Measures 3-231
3.6.4 Significant Unavoidable Adverse Impacts 3-232
3.7 Transportation 3-233
3.7.1 Affected Environment 3-235
3.7.2 Impacts 3-264
3.7.3 Mitigation Measures 3-284
3.7.4 Significant Unavoidable Adverse Impacts 3-287
3.8 Public Services 3-288
3.8.1 Affected Environment 3-288
3.8.2 Impacts 3-313
3.8.3 Mitigation Measures 3-322
3.8.4 Significant Unavoidable Adverse Impacts 3-323
3.9 Utilities 3-324
3.9.1 Affected Environment 3-324
3.9.2 Impacts 3-343
3.9.3 Mitigation Measures 3-348
3.9.4 Significant Unavoidable Adverse Impacts 3-351

4 Acronyms and References 4-1

4.1 Acronyms 4-2
4.2 References 4-4
4.2.1 Earth, Water Quality, and Water Resources 4-4
4.2.2 Air Quality 4-4
4.2.3 Plants and Animals 4-7
4.2.4 Land Use Patterns and Urban Form 4-10
4.2.5 Population, Housing, and Employment 4-12
4.2.6 Relationship to Plans, Policies, and Regulations 4-14
4.2.7 Transportation 4-18
4.2.8 Public Services 4-19
4.2.9 Utilities 4-21

5 Appendices 5-1

A Scoping and Public Outreach 5-3
B Transportation Analysis Zones Maps 5-4
C Transportation Project Implementation Table 5-11
D Utility Maps 5-13
E Environmental Review Exemptions to Promote Infill Development and Housing 5-2
5.1 Introduction and Purpose 5-3
5.2 Exemption Types 5-4
5.2.1 Infill and Housing Exemptions 5-4
5.2.2 Flexible Categorical Exemption Thresholds in SEPA Rules 5-6
5.2.3 "Exceptions" to Exemptions 5-7
5.3 City of Spokane Environmental Regulations 5-8
5.4 Potential Infill Exemption Location 5-18

Exhibits

Exhibit 1.1-1. Spokane Study Areas 1-3
Exhibit 1.1-2. City of Spokane Neighborhoods 1-4
Exhibit 1.2-1. Growth Alternatives – Comparison of Features 1-6
Exhibit 1.2-2. Ability to Meet SEPA Objectives 1-7
Exhibit 1.2-3. Alternative Concepts 1-9
Exhibit 1.2-4. Example Land Uses 1-10
Exhibit 1.2-5. Growth Distribution Maps – Housing 1-11
Exhibit 1.2-6. Growth Distribution Maps – Jobs 1-12
Exhibit 1.4-1. Summary of Citywide Impacts and Mitigation – Natural Environment 1-14
Exhibit 1.4-2. Summary of Impacts and Mitigation – Built Environment 1-15
Exhibit 1.4-3. Potential to Reduce Economic Displacement Pressure 1-29
Exhibit 1.4-4. Transportation Thresholds of Significance 1-33
Exhibit 1.4-5. Summary of Significant Impacts 1-35
Exhibit 1.4-6. Existing (2024) and Alternatives VMT per Capita 1-36
Exhibit 1.4-7. Mode Share – Existing and Alternatives 1-36
Exhibit 1.4-8. Spokane Intersection LOS – All Alternatives 1-37
Exhibit 2.1-1. Employment Growth and Alternatives 2-4
Exhibit 2.1-2. Spokane Study Areas 2-5
Exhibit 2.1-3. City of Spokane Neighborhoods 2-6
Exhibit 2.1-4. Existing Water Retail Service Areas 2-7
Exhibit 2.2-1. Recent and Ongoing Subarea Planning and Transportation Investments 2-12
Exhibit 2.2-2. Housing Target and Affordable Housing Capacity 2020-2046 2-13
Exhibit 2.2-3. City of Spokane Housing Unit Capacity by Affordability – Alternative 1 Stay the Course 2-14
Exhibit 2.2-4. Residential Typologies 2-15
Exhibit 2.2-5. Persons per Household 2-17
Exhibit 2.2-6. Single Unit and Multi-Unit Housing Shares by Alternative 2-18
Exhibit 2.2-7. Employment Projections 2-19
Exhibit 2.2-8. Commercial Typologies 2-20
Exhibit 2.2-9. Industrial and Employment Typologies 2-20
Exhibit 2.3-1. Engagement Themes 2-23
Exhibit 2.4-1. Alternatives Overview 2-26
Exhibit 2.4-2. Alternative 1 Stay the Course 2-28

Exhibit 2.4-3. Alternative 1 – Growth Intensity 2-29
Exhibit 2.4-4. Alternative 1 Housing Growth 2-30
Exhibit 2.4-5. Alternative 1 Job Growth 2-31
Exhibit 2.4-6. Alternative 2 Distributed and Balanced 2-33
Exhibit 2.4-7. Alternative 2 Housing Growth 2-34
Exhibit 2.4-8. Alternative 2 Job Growth 2-35
Exhibit 2.4-9. Alternative 3: Center City and Regional Hubs 2-37
Exhibit 2.4-10. Alternative 3 Housing Growth 2-38
Exhibit 2.4-11. Alternative 3 Job Growth 2-39
Exhibit 2.5-1. SEPA EIS Steps 2-40
Exhibit 3.1-1. Terrain 3-4
Exhibit 3.1-2. Existing Zoning 3-5
Exhibit 3.1-3. Existing Hard (Impervious) Surfaces 3-7
Exhibit 3.1-4. Hydrologic Soil Groups 3-8
Exhibit 3.1-5. Soil Type Summary 3-9
Exhibit 3.1-6. Hazardous Geology 3-13
Exhibit 3.1-7. Surface Waters 3-15
Exhibit 3.1-8. Surface Waters Summary Table 3-16
Exhibit 3.1-9. Water Quality Impairments 3-17
Exhibit 3.1-10. Shorelines 3-18
Exhibit 3.1-11. FEMA Flood Zones 3-19
Exhibit 3.1-12. Groundwater Resources 3-21
Exhibit 3.1-13. West Plains Private-Well PFAS Levels by Location 3-22
Exhibit 3.1-14. West Plains PFAS Private Well Sampling Data 3-22
Exhibit 3.1-15. Environmental Health Disparities 3-23
Exhibit 3.1-16. Summary of Impact Indicators 3-25
Exhibit 3.1-17. Existing Hard Surfaces and Forecasted Density Distribution – Alternative 1 3-26
Exhibit 3.1-18. Existing Hard Surfaces and Forecasted Density Distribution – Alternative 2 3-27
Exhibit 3.1-19. Existing Hard Surfaces and Forecasted Density Distribution – Alternative 3 3-28
Exhibit 3.1-20. Density Projections as Indicators of Impacts by Spokane Region 3-30
Exhibit 3.2-1. Spokane County $PM_{2.5}$ Trends, 2011-2023 3-38
Exhibit 3.2-2. Daily 24-hour Average PM_{10} for All Spokane County Monitoring Stations, May 2025. 3-39

Exhibit 3.2-3. Spokane County Ozone Trends, 2011-2022 3-40
Exhibit 3.2-4. Relative exposure to ozone (left) and $PM_{2.5}$ (right) in Spokane. 3-43
Exhibit 3.2-5. Transportation Emissions Summary (MTCO2e). 3-47
Exhibit 3.2-6. Emissions from community transportation under three scenarios: one with full EV adoption (assuming a 15-year vehicle lifespan), one in which the current internal-combustion vehicle mix remains constant, and one with a moderate EV adoption rate (assuming a 25- year lifespan). 3-48
Exhibit 3.2-7. Energy Emissions Summary ($MTCO_2e$). 3-48
Exhibit 3.2-8. Emissions associated with each alternative, by sector. 3-49
Exhibit 3.3-1. Noxious Weeds in the Study Area and Surrounding Region 3-55
Exhibit 3.3-2. Land Cover Types in the Study Area 3-57
Exhibit 3.3-3. Land Cover Types in the Study Area 3-58
Exhibit 3.3-4. Natural Resource Designations in the City of Spokane 3-63
Exhibit 3.3-5. Tree Canopy Cover by Neighborhood in the City of Spokane 3-65
Exhibit 3.3-6. Summary of Federally Listed Species and Washington Priority Species in the Study Area 3-68
Exhibit 3.4-1. Adopted Land Use Plan Map as of 2025 3-82
Exhibit 3.4-2. Existing Land Use Designation (summarized) by Acreage 3-83
Exhibit 3.4-3. Summary of Existing Land Uses by Area 3-83
Exhibit 3.4-4. Existing Zoning Districts Summary Table 3-85
Exhibit 3.4-5. Existing Zoning Map as of 2025 3-88
Exhibit 3.4-6. Zone by Acreage 3-89
Exhibit 3.4-7. Maximum Height Limit 3-92
Exhibit 3.4-8. Tree Canopy Coverage 3-93
Exhibit 3.4-9. Spokane United Railways system, 1929 3-97
Exhibit 3.4-10. Aerial Image of Downtown Spokane (Circa 1970 and Present Day) 3-98
Exhibit 3.4-11. Existing Land Use 3-99
Exhibit 3.4-12. Downtown Center City Spokane 3-104
Exhibit 3.4-13. Spokane Housing and Commercial (Pacific Street) 3-105
Exhibit 3.4-14. Spokane Housing (Holyoke Ave) 3-105
Exhibit 3.4-15. Land Capacity Analysis under Current Zoning –2025 (Acres) 3-106

Exhibit 3.4-16. State Archaeological Risk Assessment Model – City of Spokane Vicinity 3-107
Exhibit 3.4-17. Historic Districts – National and Local 3-108
Exhibit 3.4-18. Historic Districts and Properties in City of Spokane 3-109
Exhibit 3.4-19. Historic Districts and Properties – Central Spokane Vicinity 3-110
Exhibit 3.4-20. Existing Transportation-Related Noise 3-112
Exhibit 3.4-21. National Transportation Noise Exposure Map – Share of Population Exposed to Noise Greater than 50 dB 3-113
Exhibit 3.4-22. Population in Census Tracts within Proximity to Heavy Traffic Roadways 3-114
Exhibit 3.4-23. Land Surface Temperature and Census Blocks with Very High Vulnerability 3-116
Exhibit 3.4-24. Future Land Use Intensity Qualitative Comparison 3-119
Exhibit 3.4-25. Land Use Summary Evaluation by Area 3-120
Exhibit 3.4-26. Above Ground Cultural Resources Department of Archaeology and Historic Preservation (DAHP) Predictive Model and Summary Survey Recommendations 3-129
Exhibit 3.5-1. Population Growth 1990-2025 and Future Growth to 2046 3-134
Exhibit 3.5-2. Age Structure, City of Spokane + County Comparison (ACS S0101) 2019-2023 3-135
Exhibit 3.5-3. Race and Ethnicity – City of Spokane (2019-2023) 3-135
Exhibit 3.5-4. Persons per Household 2022 3-136
Exhibit 3.5-5. Citywide Proportion of Households by Income and Tenure 2013 and 2023 3-137
Exhibit 3.5-6. Cost-Burden by Race and Ethnicity and Tenure, City of Spokane, 2019-2023 3-137
Exhibit 3.5-7. City of Spokane Housing Stock, April 1, 2024 3-138
Exhibit 3.5-8. Net Change in Housing Stock April 1,2013 to April 1,2024 (OFM) 3-139
Exhibit 3.5-9. Housing Unit Completions and Demolitions – April 1, 2010 to April 1, 2024 3-139
Exhibit 3.5-10. Accessory dwelling units completed as of April 1st of each year 3-140
Exhibit 3.5-11. Housing Action Plan Strategies 3-141
Exhibit 3.5-12. City of Spokane Displacement Risk Map 2025 3-143
Exhibit 3.5-13. Summary of RDI Policy Evaluation 3-145
Exhibit 3.5-14. Center Line BRT and Quarter Mile Buffer with Current Zoning 2025 3-146

Exhibit 3.5-15. City Line HB 1491 Floor Area Ratio Conceptual Evaluation (2025) 3-148
Exhibit 3.5-16. Total Jobs 2002-2022 (in thousands) 3-149
Exhibit 3.5-17. Employment by Industry, 2002 and 2022 3-150
Exhibit 3.5-18. City of Spokane Employment Change by Industry, 2002 - 2022 3-150
Exhibit 3.5-19. Target Investment Area 3-152
Exhibit 3.5-20. Population Density and Race (2020) 3-155
Exhibit 3.5-21. Income and Poverty 3-156
Exhibit 3.5-22. Redlined Areas in City of Spokane 1938 3-158
Exhibit 3.5-23. Percent of housing units built before 1960 3-159
Exhibit 3.5-24. Affordability of Rental and Owner Housing 3-160
Exhibit 3.5-25. Total Jobs (2022) 3-161
Exhibit 3.5-26. Selected Job Sectors 3-162
Exhibit 3.5-27. Alternative 1 Land Capacity and Total Housing Target 3-163
Exhibit 3.5-28. Population and Household Size 3-164
Exhibit 3.5-29. Housing Capacity and Affordability – Alternative 1 3-165
Exhibit 3.5-30. Housing Types by Alternative 3-166
Exhibit 3.5-31. Housing Mix 2022 and 2046 by Alternative 3-167
Exhibit 3.5-32. City of Spokane – Compassion Spokane Approach to Homelessness 3-168
Exhibit 3.5-33. Housing Action Plan Strategies Advanced under Alternatives 3-169
Exhibit 3.5-34. Projected Housing Units Demolished by Housing Type 3-172
Exhibit 3.5-35. Projected Housing Units Demolished by Affordability Level 3-172
Exhibit 3.5-36. Projected Housing Units Demolished by Study Area 3-173
Exhibit 3.5-37. Projected Units Demolished by Displacement Risk Score 3-173
Exhibit 3.5-38. Potential to Reduce Economic Displacement Pressure 3-174
Exhibit 3.5-39. Amenities by Census Tract: Schools, Libraries, Parks, and Community Centers 3-175
Exhibit 3.5-40. Commercial and Industrial Properties likely to Redevelop 3-177
Exhibit 3.5-41. Employment Growth and Potential for Redevelopment and Displacement 3-178
Exhibit 3.5-42. Jobs/Housing Balance 3-180
Exhibit 3.5-43. Jobs in Study Areas by Alternative 3-181
Exhibit 3.5-44. Summary Matrix of Housing and Business Anti-Displacement Measures 3-184

Exhibit 3.6-1 GMA Goals 3-192
Exhibit 3.6-2. Net New Housing Units and Emergency Housing Need, 2020-2046 3-195
Exhibit 3.6-3. SRTC Horizon 2045 Topic Area Principles 3-196
Exhibit 3.6-4. City of Spokane Comprehensive Plan - Land Use Element Goals 3-199
Exhibit 3.6-5 Growth Management Act Goals - Alternative Evaluations 3-215
Exhibit 3.6-6. Countywide Planning Policies, Major Goals - Alternatives Evaluation 3-218
Exhibit 3.6-7. SRTC Metropolitan Transportation Plan - Alternatives Evaluation 3-220
Exhibit 3.6-8 THRIVE Spokane – Alternatives Evaluation 3-222
Exhibit 3.6-9. Alternatives Consistency with Northwest Spokane Neighborhood Plans 3-224
Exhibit 3.6-10. Alternatives Consistency with Northeast Spokane Neighborhood Plans 3-225
Exhibit 3.6-11. Alternatives Consistency with Center City Spokane Neighborhood Plans 3-227
Exhibit 3.6-12. Alternatives Consistency with South Spokane Neighborhood Plans 3-228
Exhibit 3.7-1.Spokane Existing Pedestrian Facilities 3-236
Exhibit 3.7-2. Spokane Existing Bicycle Network Facilities 3-239
Exhibit 3.7-3. Spokane Bicycle Priority Map 3-241
Exhibit 3.7-4. Summary of Existing Fixed Transit Types and Descriptions 3-243
Exhibit 3.7-5. Existing Transit Routes in Spokane 3-244
Exhibit 3.7-6. Spokane Vehicle Network and Roadway Classification 3-247
Exhibit 3.7-7. Spokane Transportation Network Bridges 3-248
Exhibit 3.7-8. Spokane Intersection LOS 3-249
Exhibit 3.7-9. State Routes and Functional Classifications 3-251
Exhibit 3.7-10. Existing State Facility Performance (v/c Ratio) 3-252
Exhibit 3.7-11. Spokane Freight Routes 3-255
Exhibit 3.7-12. Summary of Fatal and Serious Injury Crashes by Mode and Severity in Spokane including State Routes (2020 - 2024) 3-257
Exhibit 3.7-13. Mode share (all person trips, %) 3-258
Exhibit 3.7-14. Thresholds of Significance 3-268
Exhibit 3.7-15. Spokane Existing State Facility Volume-to-Capacity Ratio 3-271

Exhibit 3.7-16. Existing (2024) and Alternative 1 (No Action) VMT per Capita 3-273
Exhibit 3.7-17. Mode Share – No Action Alternative 3-273
Exhibit 3.7-18. Spokane Intersection LOS – Alternative 1 (No Action) 3-274
Exhibit 3.7-19. Alternative 1 (No Action) and Alternative 2 VMT per Capita 3-276
Exhibit 3.7-20. Mode Share – Alternative 2 3-277
Exhibit 3.7-21. Spokane Intersection LOS – Alternative 2 3-278
Exhibit 3.7-22. Alternative 1 (No Action) and Alternative 3 VMT per Capita 3-280
Exhibit 3.7-23. Mode Share –Alternative 3 3-280
Exhibit 3.7-24. Spokane Intersection LOS – Alternative 3 3-281
Exhibit 3.7-25. Summary of Significant Impacts 3-283
Exhibit 3.8-1. Police Officers per 1,000 Population 3-289
Exhibit 3.8-2. Spokane Police Stations 3-290
Exhibit 3.8-3. Fire Stations and Areas Served 3-292
Exhibit 3.8-4. Spokane Fire Department Stations 3-293
Exhibit 3.8-5. Schools and Districts in Spokane 3-296
Exhibit 3.8-6. Ratio of Students to Housing Units 3-297
Exhibit 3.8-7. Spokane Parks and Amenities 3-299
Exhibit 3.8-8. Parks Acreage 3-300
Exhibit 3.8-9. Trails Acreage 3-300
Exhibit 3.8-10. Park Acres per 1,000 3-301
Exhibit 3.8-11. Gaps in Park Access 3-302
Exhibit 3.8-12. Libraries in Spokane 3-305
Exhibit 3.8-13. Libraries Square Footage 3-306
Exhibit 3.8-14. Waste Facility Capacity 3-308
Exhibit 3.8-15. Poor Physical Health 3-310
Exhibit 3.8-16. Social Vulnerability Index 3-311
Exhibit 3.8-17. Student Growth by School District 3-314
Exhibit 3.8-18. Park Acreage Needs 3-314
Exhibit 3.8-19. Library Levels of Service 3-315
Exhibit 3.8-20. Social Disparities and Housing Growth 3-316
Exhibit 3.9-1. 2026 Generating Capability by Fuel Source 3-325
Exhibit 3.9-2. Change in Energy Use by End Use, 2025-2045 3-326
Exhibit 3.9-3. Customer Load Forecast 3-327
Exhibit 3.9-4. City of Spokane Water System Pressure Zones 3-329

Exhibit 3.9-5. Map of City of Spokane Water System Pressure Zones 3-330
Exhibit 3.9-6. Equivalent Residential Unit (ERU) Flowrates by Pressure Zone 3-331
Exhibit 3.9-7. 20-year Projected Number of Equivalent Residential Units per Pressure Zone 3-332
Exhibit 3.9-8. Growth Rate by Pressure Zone and Customer Class 3-333
Exhibit 3.9-9. Map of Sanitary Sewer Pump Stations In Spokane 3-336
Exhibit 3.9-10. Sanitary Sewer Pump Stations In Northwest Spokane 3-337
Exhibit 3.9-11. Sanitary Sewer Pump Stations In Northeast Spokane 3-338
Exhibit 3.9-12. Sanitary Sewer Pump Stations In Central Spokane 3-338
Exhibit 3.9-13. Sanitary Sewer Pump Stations In South Spokane 3-339
Exhibit 3.9-14. Sanitary Sewer Pump Stations In the West Plains 3-339
Exhibit 3.9-15. Drainage Concern Areas 3-341
Exhibit 3.9-16. Map of CSO/Storm/UIC Areas 3-342
Exhibit 3.9-17. Percent of gross household income spent on energy 3-345

1 Summary

1.1 Purpose

This chapter summarizes the City of Spokane's proposals to amend its Comprehensive Plan and development regulations to meet the periodic update requirements of the Growth Management Act (GMA). It summarizes the objectives to be achieved, and different Alternatives that could achieve those objectives. It also summarizes environmental review findings in the Draft Environmental Impact Statement (EIS). Details of the Alternatives are addressed in Chapter 2, and the full environmental evaluation and mitigation measures are in Chapter 3.

The Draft EIS is organized as follows:

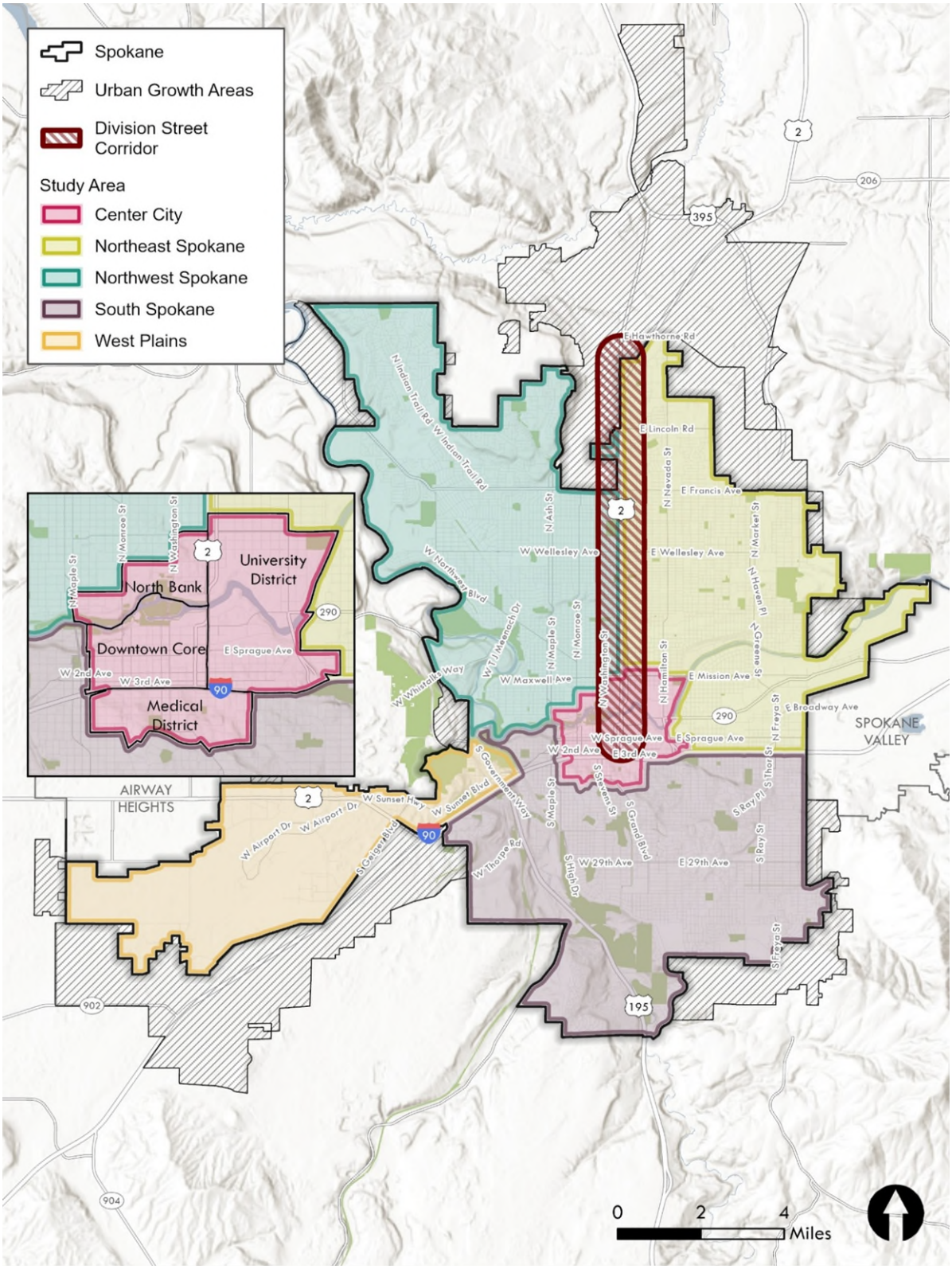
- Chapter **1 Summary**
- Chapter **2 Proposal and Alternatives**
- Chapter **3 Environment, Impacts, and Mitigation Measures**
- Chapter **4 Acronyms and References**
- Chapter **5 Appendices**

This EIS primarily focuses on the City of Spokane city limits. The city study areas in **Exhibit 1.1-1** are referenced in the EIS:

- Northwest Spokane
- Northeast Spokane
- South Spokane
- West Plains
- Center City, overlapping several study areas, including Downtown Spokane
- Division corridor, straddling Northwest and Northeast Spokane

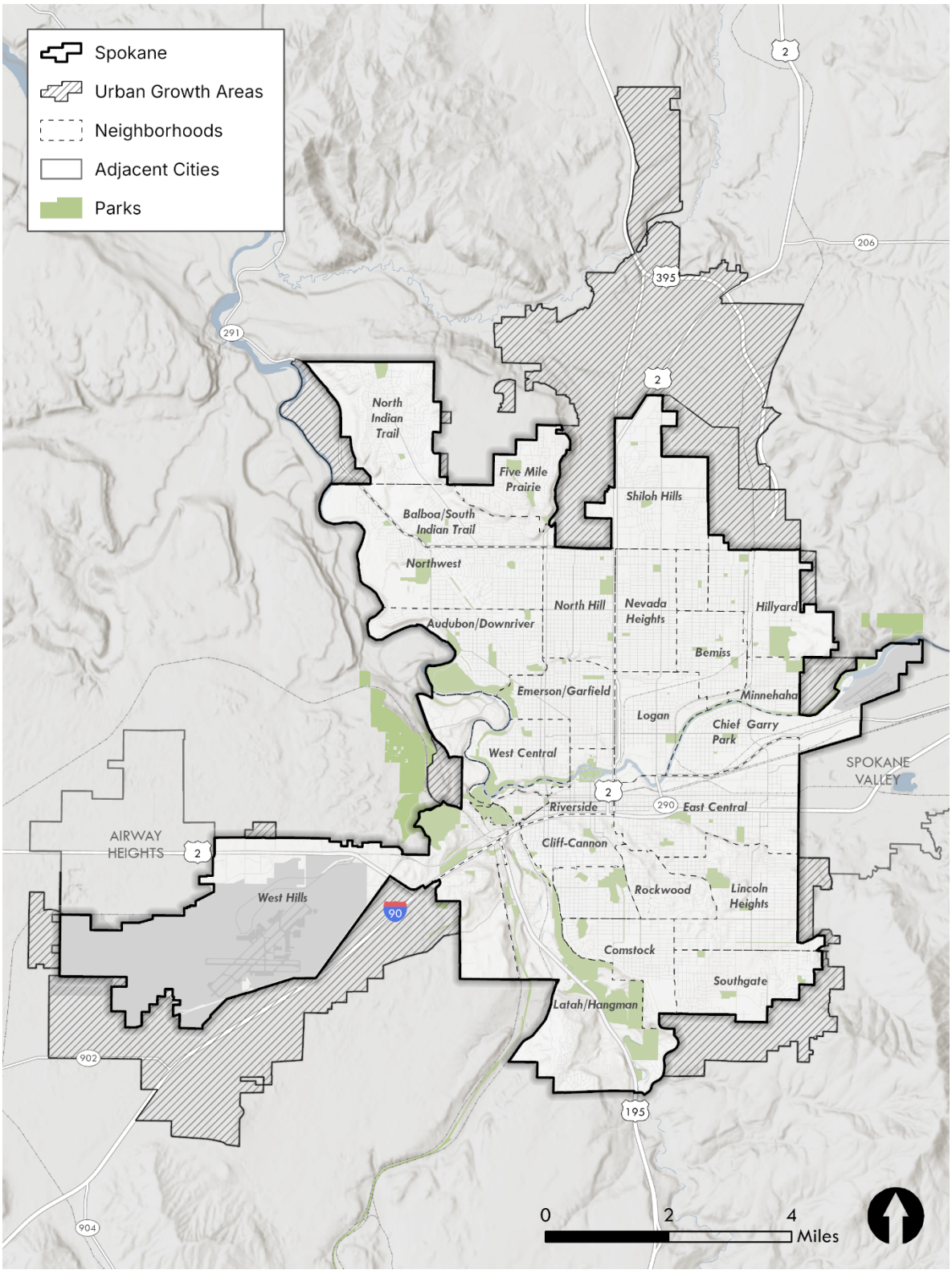
Within these broad subareas the EIS cites Neighborhood Council boundaries. See **Exhibit 1.1-2**.

Exhibit 1.1-1. Spokane Study Areas



Sources: City of Spokane, BERK, 2025.

Exhibit 1.1-2. City of Spokane Neighborhoods



Note: Peaceful Valley, Grandview/Thorpe, Browne's Addition, and Whitman neighborhoods are shown but too small at this scale to label.
Sources: City of Spokane, 2024; BERK 2024.

1.1 Public Comment Opportunities

The City of Spokane is requesting comments from the public, agencies, Tribes, and all interested parties on the Draft EIS from **December 18, 2025 to February 18, 2026**. Comments are due by **5:00 PM, February 18, 2026**. See the Fact Sheet for the method to provide comments. A series of public and agency workshops are planned during the Draft EIS comment period. For the latest information on the workshop topics and times, please see the project website at: https://my.spokanecity.org/planspokane/draft-eis.

1.2 Objectives, Proposal, and Alternatives

Objectives are required by SEPA to identify the purpose and need of the proposals and to compare alternatives according to WAC 197-11-440 and -442. Objectives are particularly important when comparing long-range plans like the City of Spokane Comprehensive Plan Periodic Update. This EIS compares alternatives for their ability to meet these objectives:

- **Meet Periodic Update Requirements:** Comply with Comprehensive Plan periodic review requirements to meet state laws including recent changes to the GMA regarding providing capacity for more housing types and affordability levels, increasing resiliency to climate impacts, evaluating tree canopy coverage, increasing opportunities for active transportation, reducing vehicle miles traveled and greenhouse gas emissions, addressing needs of overburdened communities, increasing green infrastructure, planning for jobs and economic development, and more.
- **Accommodate Growth:** Demonstrate population, transportation, and housing capacity to accommodate growth targets through 2046 based on State projections and County allocations in consultation with the City and ensure City utilities and services are expected to have sufficient capacity to serve that growth.
- **Clarify the Plan:** Update policies that are inconsistent, outdated, duplicative, or unclear.
- **Simplify the Plan and Codes:** Update and simplify future land use map categories and zoning districts and reflect any new designations such as within centers and corridors.
- **Protect Critical Areas:** Update critical area regulation updates that respond to best available science.
- **Fast-Track Desired Growth:** Facilitate desired growth in priority locations through permit streamlining, such as through SEPA infill exemptions or raising SEPA thresholds.

A vision statement, goals, or values in a plan can serve as objectives. The City's proposed draft vision statement for the Periodic Update is also considered an objective:

> *Spokane aims to foster a vibrant, resilient, and inclusive city by supporting economic growth, environmental stewardship, and the diverse needs of the whole community. The City is dedicated to ensuring access to attainable housing, safe streets, and thriving neighborhoods while inspiring innovation, cultural vitality, and connection for all Spokane residents.*

This vision incorporates PlanSpokane 2046 themes of Resilient, Connected, and Livable, as well as public engagement themes of Nature, Community, Livability, and Innovation.

As part of the City of Spokane's Comprehensive Plan Periodic Update, the City is preparing an environmental impact statement (EIS) under the State Environmental Policy Act (SEPA). The City identified EIS topics and alternatives following a scoping comment period from February 5 to April 7, 2025.

The Draft EIS studies three alternatives, the SEPA-required Alternative 1 Stay the Course (no action), and Alternatives 2 and 3 that alter patterns of growth (see **Exhibit 1.2-1**).

Exhibit 1.2-1. Growth Alternatives – Comparison of Features

	Alternative 1: Stay the Course	Alternative 2: Distributed and Balanced	Alternative 3: Center City and Regional Hubs
Plan & Code Update	Current	Periodic Update	Periodic Update
Areas of Focus for Growth	Focuses growth in Downtown and Centers and Corridors.	Mixed-use Transit-Oriented Development along frequent transit corridors. Allow more neighborhood-serving commercial uses. Simplified Land Use Plan.	Growth in downtown, regional hubs, and areas with greatest investment in transit and transportation. Allow more neighborhood-serving commercial uses. Simplified Land Use Plan.
Housing Growth Target: 2022-2046	21,738 units in addition to units already developed since 2020 New units would add about 21% new housing stock to existing dwelling units.		
Housing Mix	63% single unit / 37% multi-unit	59% single-unit / 41% multi-unit (25% of new units expected to be single-unit, 75% expected to be multi-unit)	
Housing Affordability Targets: 2022-2046	0-80% Area Median Income (AMI): Insufficient 80-120% AMI: Sufficient 120+% AMI: Sufficient	Meets all income levels. Denser housing in proximity to transit. Inclusion of new mixed-use zones. Meets state requirements (HB 1491) for transit-oriented development near bus rapid transit.	Like Alternative 2. Provides housing at all income levels with priority for denser housing along bus rapid transit per state requirements (HB 1491), and other focused areas.
Population Growth Ranges: 2022-2046	25,157 City's share of OFM medium population forecast		

	Alternative 1: Stay the Course	Alternative 2: Distributed and Balanced	Alternative 3: Center City and Regional Hubs
Job Projections 2022-2046 ** Each alternative studies a job projection from a different data source to support infrastructure planning. The different numbers are not based on an alternative's likelihood to produce more or fewer jobs.*	Regional (SRTC) Projection 34,850 net jobs. This is about 15,000 jobs above historic trend per Census.	State (ESD) Projection 24,939 net jobs This is about 5,000 jobs above historic trend.	Moderate-High Projection 38,848 net jobs This is about 19,000 jobs above historic trend. Directed to Center City, West Plains, and Hillyard/ Northeast public development authorities.

Source: City of Spokane, BERK, 2025.

Alternatives 2 and 3 are designed to meet the meet state periodic update requirements (e.g., new housing, climate, and other requirements), create the opportunity for housing at all income levels, accommodate jobs, and update policies and codes to streamline them and facilitate growth. Alternatives 2 and 3 would align with the new vision statement. Alternative 1 was developed in prior years with different growth targets and different state expectations and would partially meet the objectives. See **Exhibit 1.2-2** for a comparison across the alternatives.

Exhibit 1.2-2. Ability to Meet SEPA Objectives

Objectives	Alternative 1: Stay the Course	Alternative 2: Distributed and Balanced	Alternative 3: Center City and Regional Hubs
Meet Periodic Update Requirements	Less	Most	Most
Accommodate Growth: Housing at All Affordability Levels	More	Most	Most
Accommodate Growth: Jobs	More	More	Most
Clarify the Plan	Less	Most	Most
Simplify the Plan and Codes	Less	Most	Most
Protect Critical Areas	More	Most	Most
Fast-Track Desired Growth	Less	Most	Most
Alignment with Vision Statement	Less	Most	Most

Source: City of Spokane, BERK, 2025.

Maps of each alternative are shown in **Exhibit 1.2-3, Exhibit 1.2-4, Exhibit 1.2-5**, and **Exhibit 1.2-6**. Alternative 1 maintains current designations and housing and job growth intensities. Alternatives 2 and 3 add more moderate and high-density housing, mixed use and commercial, and employment/industrial areas in areas with frequent transit or in already-established centers.

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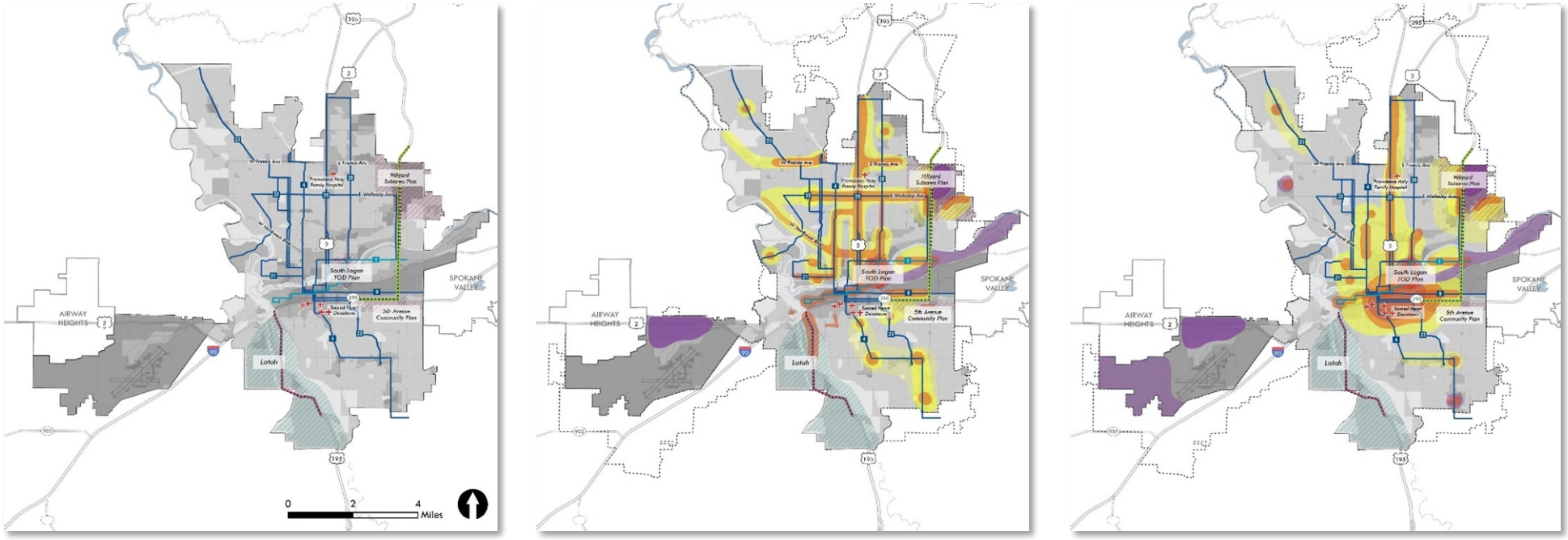
Exhibit 1.2-3. Alternative Concepts

Alternative 1: Stay the Course	Alternative 2: Distributed and Balanced	Alternative 3: Center City and Regional Hubs



Key Features

- Subarea Planning
- Additional Infrastructure Study
- Transit Routes, Selected
- North Spokane Corridor/ US 395
- Children of the Sun Trail
- Inland Empire Way + connections
- Hospitals

Growth Intensity

- Low
- Moderate
- Moderate-High
- High
- High Density Housing
- Moderate Density Housing
- Mixed-use/Commercial
- Employment/Industrial Light
- Employment/Industrial Heavy

Source: City of Spokane, BERK, 2025.

Exhibit 1.2-4. Example Land Uses

Residential

Single Family with ADU

Six Plex (S Grand Blvd.)

Lowrise Apt (605 S Grand)

Box Car, Univ. District

Low Density Housing		Moderate Density Housing	High Density Housing

Commercial/Mixed Use

Corner Cafe (Maple Street)

Shopping Center

Nonna Mixed Use

River Park Square

Neighborhood Commercial	Commercial	Mixed Use	Downtown

Industrial/Employment

West Plains Area

Spokane Med. District

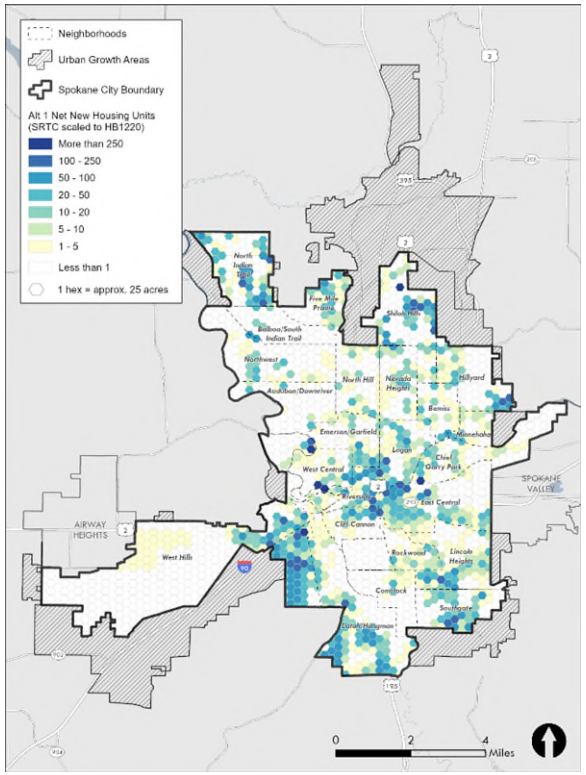
Trent Avenue

860 E Spokane Falls

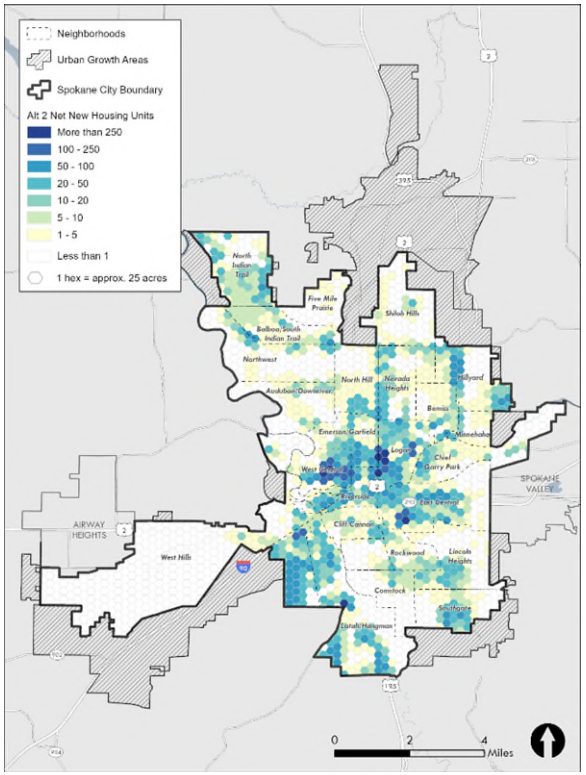
Light Industrial	Employment Light	Heavy Industrial	Employment Heavy

Exhibit 1.2-5. Growth Distribution Maps – Housing

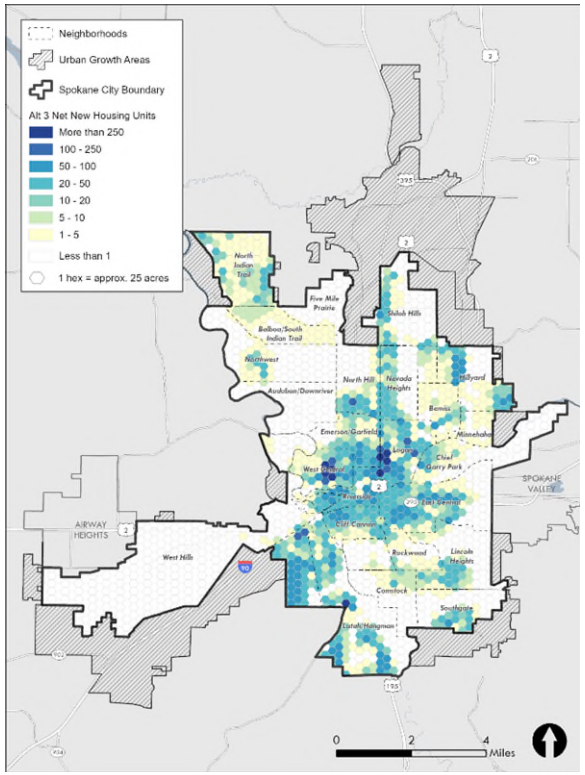
Alternative 1: Stay the Course



Alternative 2: Distributed and Balanced



Alternative 3: Center City and Regional Hubs



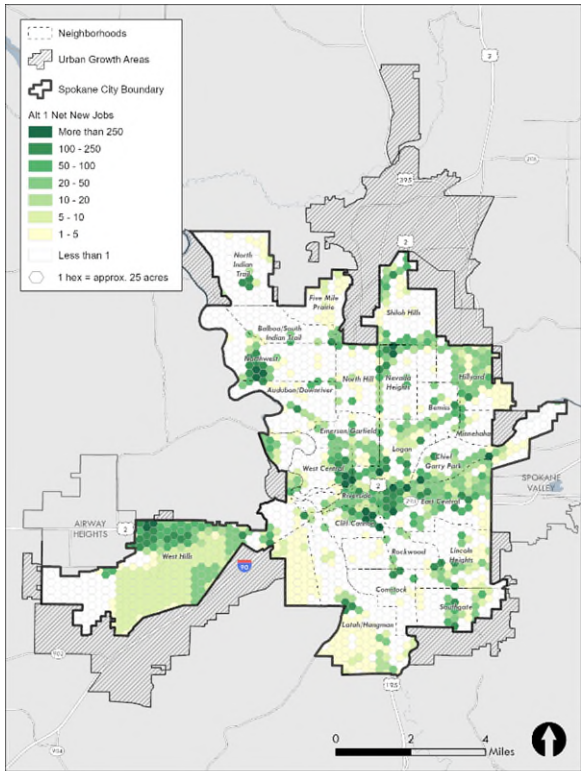
Source: City of Spokane, BERK, 2025.

Legend – Net New Housing Units

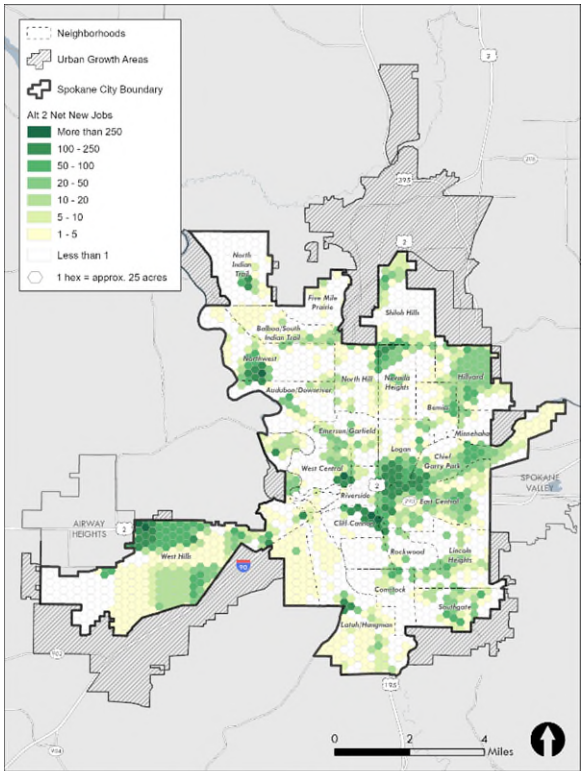
- More than 250
- 100 - 250
- 50 - 100
- 20 - 50
- 10 - 20
- 5 - 10
- 1 - 5
- Less than 1
- 1 hex = approx. 25 acres

Exhibit 1.2-6. Growth Distribution Maps – Jobs

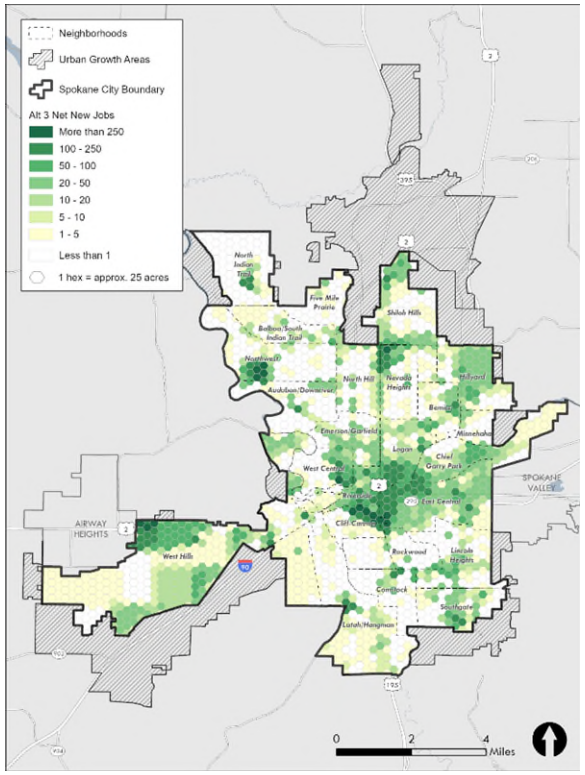
Alternative 1: Stay the Course



Alternative 2: Distributed and Balanced



Alternative 3: Center City and Regional Hubs



Source: City of Spokane, BERK, 2025.

Legend – Net New Jobs

- More than 250
- 100 - 250
- 50 - 100
- 20 - 50
- 10 - 20
- 5 - 10
- 1 - 5
- Less than 1
- 1 hex = approx. 25 acres

1.3 Key Issues and Options

The key issues facing decision makers include:

- Development of a growth concept and goals and policies that implement the plan's vision and objectives:
  - ***Vision:*** *"Spokane aims to foster a vibrant, resilient, and inclusive city by supporting economic growth, environmental stewardship, and the diverse needs of the whole community. The City is dedicated to ensuring access to attainable housing, safe streets, and thriving neighborhoods while inspiring innovation, cultural vitality, and connection for all Spokane residents."*
  - ***Objectives:***
    - Meet Periodic Update Requirements
    - Accommodate Growth
    - Clarify the Plan
    - Simplify the Plan and Codes
    - Protect Critical Areas
    - Fast-Track Desired Growth
- Approval of a comprehensive plan that meets state and county requirements to accommodate housing needs at all income bands including best location for units at 0-80% AMI affordability and addressing racially disparate impacts in access to housing.
- Approval of a comprehensive plan that provides land use and transportation strategies to reduce greenhouse gas emissions.
- Approval of a comprehensive plan that increases resilience to climate-related hazards, reduces exposure to pollution, and addresses environmental impacts.
- Approval of development regulations that implement the Comprehensive Plan goals, policies, and land use plan.

1.4 Summary of Impacts and Mitigation Measures

This section summarizes findings for each environmental topic addressed in the EIS, including:

- Earth, Water Quality, and Water Resources
- Air Quality/Greenhouse Gases
- Plants and Animals
- Land Use Patterns and Urban Form
- Relationship to Plans, Policies, and Regulations
- Population, Employment, and Housing
- Transportation
- Public Services
- Utilities

See **Chapter3 Environment, Impacts, and Mitigation Measures** for the full context of the affected environment, potential impacts, and mitigation measures. Exhibit 1.4-1 and Exhibit 1.4-2 show a summary of impacts and mitigation for each alternative.

Exhibit 1.4-1. Summary of Citywide Impacts and Mitigation – Natural Environment

Topic: Potential Impacts and Mitigation	Alt. 1	Alt. 2	Alt. 3
Earth, Water Quality, and Water Resources *(section 3.1.2)*			
Potential for soil disturbance, erosion, water pollution, and soil contamination from construction activities.	▽	▽	▽
Potential for increased pollution and potential for increased rainfall runoff flows based on housing density distribution. (Higher impact weight than Jobs)	▼▼	▼	▽
Potential for increased pollution based on job projections against already developed hard surfaces. (Lower Impact Weight than Housing)	▼	▽	▼
Air Quality/Greenhouse Gases *(section 3.2.2)*			
Transportation emissions	△	△	△
Emissions from non-transportation sources	▼▼	▼	▼
Plants and Animals *(section 3.3.2)*			
Consistency with best available science.	—	△	▲
Potential for impacts to plant and animal species, habitat conversion, or loss of habitat connectivity			
Center City	△	△	▲
Northwest	▼▼	▼	▼
Northeast	▼	▽	▽
South	▼▼	▼▼	▼▼
West Plains	▼	▼	▼
Strength of Mitigation – Plan and Code Updates	—	▲	▲

Adverse Impacts: Most impacts (▼▼), More impacts (▼), Less impacts. (▽).
Potential Beneficial Impacts/Mitigation: Neutral Impacts or Continued Plan/Code (—), Moderately positive (△), or Positive (▲). For example: New Climate Adaptation and Mitigation Policies, Critical Area Policy Amendments and Code Updates, and Effects of Increased Housing Affordability/Reduction of Disparate Impacts Policies.

Exhibit 1.4-2. Summary of Impacts and Mitigation – Built Environment

Potential Impact and Indicators	Alt. 1	Alt. 2	Alt. 3
Land Use Patterns and Urban Form *(section 3.4.2)*			
Land use and urban form compatibility	▽	▼	▼
Cultural and historic resources, loss, alteration, or damage	▼▼	▼▼	▼▼
Environmental Justice - Increased exposure of overburdened populations to light or noise pollution, environmental hazards, or urban heat island effects	▼	▽	▽
Population, Employment, and Housing *(section 3.5.2)*			
Capacity for housing and population targets	▲	▲	▲
Housing variety and affordability	▼	▲	▲
Implementation of Housing Action Plan	△	▲	▲
Growth in housing displacement risk areas / increased housing supply that reduces economic displacement pressure	▽/ ▼	▼/ △	▼/ △
Amount of new housing in connected and accessible neighborhoods (transit, libraries, parks)	—	▲	△
Jobs/housing balance	▽	—	▽
Job types and quantity and ability to advance City and regional economic development strategies	▲	△	▲
Commercial business economic displacement	▼	▽	▼
Relationship to Plans, Policies, and Regulations *(section 3.6.2)*	▼	△	△
Transportation *(section 3.7.2)*			
Pedestrian Network and Bicycle Network	▽	▽	▽
Transit	▼▼	▼	▼
Vehicle Miles Traveled	▼▼	▼	▼
Safety	▼▼	▼	▼
Road intersection levels of service	▼▼	▼	▼
State Facilities	▼	▼	▼
Public Services *(section 3.8.2)*			
Citywide demand for police, fire/emergency medical services, schools, parks, libraries, and solid waste	▼	▼	▼
Demand for school capacity – Spokane School District	▽	▼	▼
Demand for school capacity – Mead School District	▼	▽	▽
Environmental Justice – Growth in Areas with Health and Social Disparities and Greater Service Demand	▽	▼	▼▼

Potential Impact and Indicators	Alt. 1	Alt. 2	Alt. 3
Utilities *(section 3.9.2)*			
Power, Water, Wastewater Demand	▼	▽	▽
Power, Water, Wastewater Infrastructure Upgrades	▽	▼	▼
Stormwater Generation	▼	▽	▽
Strength of Mitigation Potential – Plan and Code Updates	—	▲	▲

Impacts: Most impacts (▼▼), More impacts (▼), Less impacts. (▽), Moderately positive (△), or Positive (▲).
Potential Beneficial Impacts/Mitigation: Neutral Impacts or Continued Plan/Code (—), Moderately positive (△), or Positive (▲). For example: New Climate Adaptation and Mitigation Policies, Critical Area Policy Amendments and Code Updates, and Effects of Increased Housing Affordability/Reduction of Disparate Impacts Policies.

1.4.1 Earth, Water Quality, and Water Resources

Latah Hangman Creek Confluence, M. Murphy, City of Spokane, 2024

How did we analyze Earth, Water Quality, and Water Resources?

The EIS team reviewed data sources related to steep slopes, land development impacts, hard surfaces and water runoff, soil types and water infiltration, geologic hazards and contaminated soils, surface water bodies and watersheds, water quality impairments, shorelines, floodplains, and groundwater resources. The team also considered data on environmental health disparities across Spokane.

Thresholds of significance used in this analysis include:

- **Environmental Earth and Soil Hazards:** Disturbances of existing contaminated areas to levels that could endanger human health or the environment.
- **Surface Water Quality**: Increases in amount of pollution to receiving waters that would impair their designated uses (such as human contact and fish habitat).
- **Runoff Increases:** Impervious surface expansions that would increase runoff flow volumes and durations to streams by magnitudes resulting in bank scour and erosion.
- **Groundwater Recharge:** Impervious surface expansions that would decrease groundwater recharge beyond designated limits.
- **Groundwater Quality:** Increases in amount of pollution discharged to levels that would contaminate groundwater supplies.

What impacts did we identify?

All alternatives would have impacts from construction, which would remove some vegetation and hard surfaces, which could lead to soil disturbance, erosion, water pollution, and soil contamination. All alternatives would also have potential for increased pollution, due to growth, and increased rainfall runoff, due to increased hard surfaces. Under all alternatives, stormwater runoff best management practices (BMPs), and increased density, which would reduce sprawl in the region, would mitigate these impacts.

What is different between the alternatives?

Increased population, housing, and jobs can increase impacts to earth and water resources in the city through increased vehicle use, commercial and light industrial activities that produce waste substances, landscaping with chemicals, and other pollution-generating activities. These impacts would be mitigated by the presence of stormwater runoff best management practices (BMPs) on roadways and other pollution-generating surfaces. Overall, Alternative 1 has the highest impacts, Alternative 2 has medium impacts, and Alternative 3 has the lowest impacts for earth, water quality, and water resources.

- Projections for increased housing are the metrics with the most weight and are used in the earth and water resources impacts analysis as indicators of increased rainfall runoff. The amount of land with hard surfaces versus vegetation impacts how much and how quickly rainfall runoff and pollutants may soak into the earth or are transported to natural receiving waters. Housing density distribution differs across the alternatives. By creating more density in areas that are currently developed, Alternative 3 has the lowest expected pollution and stormwater runoff impacts and Alternative 2 has the second lowest impacts. Alternative 1, in contrast, places more growth in areas with more undeveloped land.

- Job projections are the metrics with the least weight in the earth and water resources impact analysis and are used as indicators of increased pollution. Job projections differ, with Alternative 1 and Alternative 3 having the greatest job growth and therefore the greatest potential increased pollution impacts compared to Alternative 2.
- Alternatives 2 and 3 have the strongest mitigation due to including code update, a new Climate Element, and critical area regulations updates.

What are some solutions or mitigation for impacts?

- Alternatives 2 and 3 include a new Climate Element with climate resilience and greenhouse gas reduction goals and policies.
- Alternatives 2 and 3 review and update critical areas regulations.
- Federal, state, and regional regulations on water quality, shoreline management, floodplain management, flood insurance, endangered species, stormwater management, highway runoff, erosion control, hydraulic control, and environmental standards also mitigate (by preventing or minimizing) most impacts from development.
- The City could consider additional measures such as installing updated stormwater controls on roadways, prioritizing opportunities to restore critical area buffers, protecting and expanding tree canopy, and following recommendations of a recent environmental code audit.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts to earth and water resources are expected from the plan alternatives since development associated with every project alternative would be required to implement best management practices (BMPs) to minimize or avoid potential impacts to earth and water resources.

1.4.2 Air Quality/Greenhouse Gases

How did we analyze Air Quality/Greenhouse Gases?

The EIS team reviewed data sources related to air quality issues and regulations, regional greenhouse gas emissions, regional air quality monitoring data, air quality permitting requirements, and climate impacts on air quality and vulnerable populations. Greenhouse gas (GHG) emissions estimates were based on the City's 2022 GHG inventory, population and household estimates, employee counts, energy consumption, and transportation modeling. Other pollutants, including $PM_{2.5}$, ozone, and NO_x were assessed qualitatively using City and State sources.

Thresholds of significance used in this analysis include the alternative's ability to achieve:

- 45% reduction in GHG emissions by 2030
- 70% reduction in GHG emissions by 2040
- Net Zero by 2050 (per GHG Inventory Results)

What impacts did we identify?

For all three scenarios, emissions from energy consumption and vehicle transportation will lead to air quality issues and pollution burden throughout the city. This will especially be the base in areas with closer proximity to major roads and highways. Several neighborhoods are already disproportionately exposed to pollutants such as $PM_{2.5}$ and ozone, a pattern that is especially evident in eastern Spokane, including the Hillyard, Lincoln Heights, and Chief Garry Park neighborhoods.

Despite higher VMT when compared to the 2024 baseline, all alternatives show a net decrease in transportation emissions by 2046. This reduction is primarily driven by statewide policy assumptions, including the 2035 ban on internal combustion engine sales and the 2030 clean-electricity mandate. When modeled with a 15-year vehicle lifespan (full EV Adoption), these policies result in faster paced vehicle turnover and substantial emissions reductions.

The 2030 clean-electricity mandate significantly reduces community energy emissions across all alternatives when compared to the 2024 baseline.

Differences in energy emissions between the three growth alternatives are driven largely by projected changes in residential housing stock and employment capacity

What is different between the alternatives?

Alternative 1 produces the highest emissions for both community energy and transportation. Higher projected employment capacity and a lower proportion of multifamily housing lead to elevated energy consumption in 2046. Transportation emissions are also greatest in this alternative due to the highest projected VMT and the lowest share of walking, biking, and transit trips. This car-dominant pattern reduces mobility for residents without vehicle access and increases housing scarcity due to limited multifamily options.

Alternative 2 results in the lowest energy and transportation emissions across all scenarios. Transportation emissions decline due to the lowest VMT and a reduced share of trucks and heavy-duty vehicles. Energy emissions also decrease, driven by a larger share of multifamily housing and the lowest projected commercial and industrial employment capacity. Compared to Alternative 1, this alternative supports greater transportation choice and expanded multifamily housing options. However, one potential tradeoff is a more competitive job market due to reduced employment growth.

Alternative 3 results in emissions lower than Alternative 1, but slightly higher emissions than Alternative 2. Energy emissions are influenced by the highest projected employment capacity among all alternatives, although the emphasis on multifamily housing alleviates overall energy demand relative to Alternative 1. Transportation emissions are slightly lower than those in Alternative 1 due to marginally reduced VMT, but higher than those in Alternative 2. Overall, Alternative 3 represents a middle ground between the higher-emissions No Action alternative and the lower-emissions Alternative 2 Distributed and Balanced model.

What are some solutions or mitigation for impacts?

- Alternatives 2 and 3 update the existing comprehensive plan policies, including those that protect the natural environment and reduce pollution, and also include new climate resilience and greenhouse gas reduction goals and policies.
- Federal, state, and regional regulations help to mitigate impacts from criteria pollutants, vehicle emissions, and other air quality hazards.
- Washington State regulations, like the Climate Commitment Act, Clean Energy Transformation Act, Clean Buildings Performance Standard, Clean Buildings Act, energy codes, and zero-emission vehicle standards, support the City in reducing greenhouse gas emissions.
- Spokane's 2021 Sustainability Action Plan also addresses renewable electricity targets and how to achieve them while mitigating risks from climate change and investing in strengthening Spokane communities.
- The City could consider additional investment in multi-modal transportation infrastructure, fees that reduce traffic congestion, greater land use mix and density, electric vehicle adoption, incentives for building electrification and energy efficiency, designated truck routes, tree canopy protection and enhancement, street sweeping to reduce dust, zoning standards and other codes that reduce poor air quality exposure, and increased education on air pollutants.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts on air quality and GHG emissions are expected. By implementing mitigation measures, supporting local and state climate initiatives, and through ongoing regulatory changes, the alternatives could lead to lower GHG emissions on a per capita basis compared to current conditions. Although each option would produce GHG emissions from growth and development within the city, focusing development in targeted areas potentially offsets these impacts by preventing development in peripheral regions of the city.

1.4.3 Plants and Animals

Ponderosa Pine, City of Spokane, 2024

How did we analyze Plants and Animals?

The EIS team reviewed data related to habitat types, designated habitats, local habitat conditions, and fish and wildlife species in Spokane. This includes terrestrial, aquatic, and riparian habitats more broadly, along with mapped shorelines, wetlands, floodplains, and priority habitats with greater importance to fish or wildlife.

Thresholds of significance used in this analysis include:

- **Best Available Science:** An alternative would be inconsistent with or counter to best available science.
- **Threatened and Endangered Species:** An alternative may have adverse effects to state or federally listed threatened or endangered species or their habitats that could not be sufficiently addressed through avoidance, minimization, or mitigation measures, and could potentially result in an up-listing or jeopardy determination.
- **Other Species:** An alternative could have population-level adverse effects to other important non-listed plant or wildlife species (e.g., priority species, migratory birds) that would be perceptible and measurable within the surrounding region.

- **Habitat Conversion:** An alternative would potentially result in permanent habitat conversion, or loss of habitat connectivity sufficient to compromise overall regional ecosystem function relative to current conditions.

What impacts did we identify?

All alternatives would see some impacts from new development in currently vegetated areas, impacting wildlife and fish habitats. Increased impervious surfaces could also affect aquatic habitats by increasing peak flows, reducing low flows, introducing pollutants, increasing water temperatures, and reducing the amount of shade. Short-term construction activities could also have impacts through runoff of soils and sediments in aquatic habitats, as well as potential spills of fuels and fluids from construction equipment. Noise impacts from construction could also disturb wildlife. Tree canopy loss in areas with overburdened populations could have an elevated risk of adverse impacts, however, creating additional low-cost housing options in areas with more tree canopy could be beneficial.

What is different between the alternatives?

Overall, Alternative 1 has the highest impacts while Alternatives 2 and 3 have lesser impacts.

- Alternative 1 would concentrate the least amount of new housing in areas that are currently developed and the greatest amount of new housing in areas that contain substantial pockets of priority habitat or other habitat, including North Indian Trail, Balboa/South Indian Trail, and Hillyard. It would also place growth in Grandview/Thorpe and Latah/Hangman but the other alternatives would focus a similar amount in these areas.
- Alternatives 2 and 3 would add greater density in already developed areas, such as Center City and the Division Corridor, putting less development pressure on the less developed areas of Spokane that contain more plant and animal habitat.
- Alternatives 2 and 3 would update the City's critical areas code for best available science whereas Alternative 1 would not include this update.

What are some solutions or mitigation for impacts?

- Alternatives 2 and 3 include new climate resilience and greenhouse gas reduction goals and policies, which could also support plant and animal habitats.
- Alternatives 2 and 3 also review and update the City's critical areas regulations best on best available science.
- Federal, state, and local regulations can minimize impacts to wildlife, including the Endangered Species Act, Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act, Section 404 of the Clean Water Act, the Washington State Growth Management Act, the Washington Shoreline Management Act, several sections of the Washington Administrative Code, and the City's Environmental Standards provisions of in Title 17E of the SMC and the Spokane Shoreline Master Program.
- The City could consider increased program resources for the SpoCanopy tree canopy cover program, incentive programs for habitat conservation and restoration, land acquisition opportunities in key

areas, adaptive management policies for critical area and shoreline codes, and critical areas code language that limits clearing and soil disturbance.

With mitigation, what is the ultimate outcome?

All of the alternatives would result in unavoidable adverse impacts such as permanent conversion of forested areas and vegetated open space to developed space, decreased wildlife habitat connectivity, and additional stormwater runoff to aquatic habitats from increased impervious surfaces. However, because much of the population and employment growth anticipated under the alternatives would take place in currently developed areas, and because of existing and anticipated regulations, these effects would be moderated below the level of significance. No significant unavoidable adverse impacts are expected to result from any of the alternatives.

1.4.4 Land Use Patterns and Urban Form

Overlook, Cliff Park, M. Murphy, City of Spokane, 2024.

How did we analyze Land Use Patterns and Urban Form?

The EIS team reviewed the local policy framework, existing land use designations and zoning districts, urban form regulations, land use patterns and current conditions, and cultural resources. The team also included an analysis of environmental justice considerations, including noise, light and glare, shade and shadow, and heat islands.

Thresholds of significance used in this analysis include:

- **Land use compatibility:** Changes in use type between adjacent areas and any likely incompatibility. Land use incompatibility could be related to health and safety (such as noise levels), activity levels at various times of day/night, or conflicting movement patterns.
- **Urban form compatibility:** Changes in building form, scale, massing, or spatial organization between adjacent areas and any likely incompatibility. Urban form incompatibility may involve abrupt transitions in building height or bulk, inconsistent setbacks or street wall continuity, or mismatched public realm design that result in visual disruption, diminished walkability, or the overshadowing of public spaces.
- **Cultural Resources:** Loss, alteration, or damage of archaeological, cultural, and historical resources and sites due to growth allowed by alternatives.
- **Environmental Justice:** Land use or urban form changes that disproportionately impact historically marginalized or underserved communities with environmental, health, or socioeconomic burdens. This includes increased exposure to noise and light pollution, as well as urban heat island effects, especially in areas with high environmental health disparities, sensitive populations, and limited tree canopy, vegetation, or public open space.

What impacts did we identify?

While the alternatives differ in how growth is distributed and intensified across the city, all alternatives concentrate the highest levels of future growth in centers, corridors, and commercial and industrial/employment areas that already feature higher intensities, a more diverse mix of uses, and greater access to frequent transit. Outside these hubs, growth is directed toward low- to moderate-intensity housing and neighborhood-scale commercial development in designated locations. More diverse land uses will locate near each other under all alternatives, increasing mixed-use patterns but also potentially causing adverse compatibility impacts.

Over time, infill and redevelopment will raise development intensity in areas not yet built to full zoning capacity. Spillover effects such as noise could also occur. Additional height and bulk in commercial, mixed-use nodes is expected and would likely be consistent with development experienced over the last 20 years. Residential areas would see limited changes in height but more development of middle housing types and accessory dwelling units (ADUs). Some neighborhoods could see noticeable changes such as apartments or middle housing being built next to smaller-scale or single-unit homes. Some trees would be displaced on private property as bulkier development occurs, however street trees may increase where required with redevelopment. Building shadows from taller and bulkier buildings would occur, and some scenic views could be impacted. There is also potential for disturbance to archeological resources during construction and effects to historic properties under all alternatives.

What is different between the alternatives?

Land Use and Urban Form Compatibility

- Alternative 1 continues existing zoning so minimal new conflicts between adjacent land uses are expected. Existing scale and form patterns would be maintained, and abrupt transitions could occur

where high density Centers meet lower-density neighborhoods. There would be limited improvements in street connectivity, sidewalks, and public realm design.

- Alternative 2 maintains existing network of centers and corridors but better connects them by encouraging greater integration of mixed-use development and commercial activities along transit-rich corridors. Alternative 2 may reduce large-scale incompatibility between land uses by spreading growth in existing center and corridors and employment hubs. Small-scale, neighborhood-oriented retail nodes may create conflicts in some residential areas in terms of noise and traffic. Changes in building height or scale could contrast with low density neighborhoods as gradual densification occurs. More street-level design and pedestrian infrastructure could occur and improve walkability.
- Alternative 3 directs most of the new housing, mixed-use development, and job growth toward major hubs, particularly Center City and the University District as well as West Plains and Hillyard. Concentration of high-intensity residential, commercial, and industrial uses may create sharp transitions between dense hubs and lower-density neighborhoods. More intense building scale, massing, and intensity would be located in major hubs. There may be more intense development in Center City to the south and west compared to current uses and plans. Transitions from Center City are expected to be gradual.

Cultural Resources

- Alternative 1 provides for more development in undeveloped areas and may result in less redevelopment pressure overall on historic sites though since more development is focused in low density areas there may be a greater risk that undisturbed cultural resources may be found.
- Alternative 2 provides for more housing types and could create impacts where new mixed-use nodes or corridors overlap with sensitive historic or cultural sites. With less pressure to develop in lower density areas compared to Alternative 1, there could be less potential risk to undisturbed cultural resources under Alternative 2.
- Alternative 3: Concentrated development in Center City and Northeast in Hillyard where there are documented historic and cultural resources could mean a greater potential to alter or demolish historic buildings or overlap sensitive cultural sites. Incentives to encourage adaptive reuse and historic preservation regulations would be applied. With less pressure to develop in lower density areas, there could be less potential risk to undisturbed cultural resources under Alternative 3 compared to Alternative 1.

Environmental Justice

- Alternative 1 continues current plans and provides for growth primarily in undeveloped areas. It does not address racially disparate impacts or climate-related hazards such as adaptation to extreme heat. Historically underserved communities may continue to face unequal access to amenities, transit, or services and existing environmental burdens.
- Under Alternative 2, more population could be located on corridors with transportation noise and there could be more urban streetscapes with less tree canopy. However, there is an opportunity to increase landscaping, tree canopy, and shade with new development. A broader distribution of mixed-use development and services may increase access to historically underserved communities and reduce environmental burdens by encouraging transit use and shorter trips.

- Under Alternative 3, most of the new housing, mixed-use development, and job growth is directed toward major hubs, particularly Center City as well as West Plains and Hillyard. This targeted approach to development creates opportunities for large-scale infrastructure investments and energy-efficient design, but it may also concentrate environmental stressors in specific areas unless carefully mitigated such as through enhanced streetscape as a baseline improvement across more corridors (addresses tree canopy and extreme heat), criteria for neighborhood commercial areas to provide commercial and civic uses in areas without larger commercial nodes, noise abatement and standards, and other similar approaches.

What are some solutions or mitigation for impacts?

- The City's municipal code can help mitigate compatibility challenges in urban centers, corridors, and employment/industrial hubs and address height, transitions between zones, building coverage, landscaping, and aesthetic considerations. Some sections also address noise control, lighting shields in Planned Unit Developments, and portable cooling devices for renters.
- Federal and state laws that govern the designation and protection of cultural resources can mitigate impacts, such as the National Historic Preservation Act, the Archeological Resources Protection Act, and several State laws.
- The City's Shoreline Master Program includes regulations to stop work and studies if cultural resources are encountered.
- Spokane's zoning code includes Chapter 17D.100 Historic Preservation, which addresses the nomination of historic landmarks or districts.
- The city could consider expanded development regulations and place-specific strategies:
  - Apply cultural resources discovery policies to the full city limits instead of only designated shoreline areas and develop a "decision tree" to determine appropriate level of investigation and mitigation for below-ground cultural resources.
  - Require detailed construction noise rules and best practices, noise reduction standards in areas with high exterior noise levels, and noise reducing pavement in targeted areas. Coordinate with WSDOT on sound wall construction.
  - Provide additional development standards for light and shading, and make investments to reduce impacts of extreme heat such as Tribal and cultural infrastructure, resilience hubs, tree canopy expansion, or building retrofits.

With mitigation, what is the ultimate outcome?

There are no significant, unavoidable adverse impacts expected for land use, urban form, and environmental justice. Application of the City's adopted or new development regulations and zoning requirements, including height, bulk, and scale requirements as well as climate mitigation and adaptation measures, are anticipated to sufficiently mitigate these impacts.

All the alternatives have the potential for significant adverse impacts to cultural resources. Proactive consideration of impacts to cultural resources results in more effective identification, planning, and protection than reactive responses to inadvertent discoveries during project implementation. A well-

designed and implemented pre-project cultural resource review process is the most effective way to avoid, minimize, or mitigate adverse impacts.

1.4.5 Population, Employment, and Housing

Duplex, City of Spokane, Undated

How did we analyze Population, Employment, and Housing?

The EIS team reviewed data on population growth, household characteristics, housing stock and affordability, displacement risk, racially disparate impacts, bus rapid transit and housing, jobs and sectors, and economic development goals.

Thresholds of significance used in this analysis include:

- **Capacity for Housing and Population:**
  - Ability of the alternative to provide sufficient buildable land capacity for population and housing.
- **Housing Variety and Affordability:**
  - Ability to increase the supply, diversity, and affordability of market-rate housing.
  - Ability to increase the supply of income-restricted housing.
  - Regulatory barriers to and insufficient capacity for production of affordable units needed (in line with City's role / requirements under HB 1220).
  - Ability to meet transit-oriented development requirements, or exemption requirements, in proximity to bus rapid transit stations per state legislation.
- **Equity & Disparate Impacts:**
  - Amount of new housing in areas with high displacement risk.
  - Projected loss of homes due to demolition in high displacement risk areas.
  - Amount of new housing in connected and accessible neighborhoods (transit, libraries, parks).
  - Potential for job or business displacement for employment uses located within medium/high intensity residential or mixed-use designated areas.

- **Employment:**
  - Ability to adversely affect citywide Jobs/Housing balance.
  - Job types and quantity and ability to advance City and regional economic development strategies.

What impacts did we identify?

All alternatives provide more capacity than the total citywide housing target and would more than meet population targets. All alternatives also incorporate some housing policy and code changes made as a result of the City's Housing Action Plan, such as allowing more middle housing. Alternatives 2 and 3 would better support housing affordability than Alternative 1. The majority of housing citywide would continue to be single-unit under all alternatives. The City would also provide enough density allowances near transit to meet State requirements. Under all alternatives, the City would continue to address temporary shelter, re-housing, transitional housing, and permanent supportive housing for people experiencing homelessness. Under all alternatives, most jobs are in Northeast Spokane and Center City. West Plains will see a large change compared to present. Job increases in Northwest Spokane will be modest.

What is different between the alternatives?

Overall, Alternative 1 has the highest impacts while Alternatives 2 and 3 have lesser impacts.

Housing Variety and Opportunities

- Alternative 1 would not update the housing element of the comprehensive plan and would not provide sufficient capacity in zones with potential to support new units at 0-80% AMI affordability level, with a deficit of 5,477 units in the 2022-2046 period. It would also not make additional changes to undo racially disparate impacts and address displacement, or update development regulations around emergency shelters, transitional housing, emergency housing, and permanent supportive housing.
- Alternatives 2 and 3 propose to increase opportunities for moderate to high intensity residential and mixed-use development, which would increase land capacity and accommodate the required housing targets by income band. It would also provide for more mixed-uses/commercial and higher intensity residential along the City Line transit corridor.
- Under Alternatives 2 and 3, a greater share of the city's housing capacity would be multi-unit housing at 41%, instead of the 35% under Alternative 1. Alternative 3 would focus more density in the Center City and Division Corridor study areas as well as selected other corridors, while Alternative 2 would add density to more corridors throughout the city.
- Alternatives 2 and 3 update development regulations for emergency shelters, transitional housing, emergency housing, and permanent supportive housing in line with state requirements.
- Alternatives 2 and 3 would advance more strategies from the City's Housing Action Plan such as streamlining permitting, improving infrastructure, targeting higher intensity development near transit, and other strategies to reduce racially disparate impacts consistent with new Housing Element requirements.

Housing Production and Displacement

Potential for Physical Displacement: Based on growth patterns, Alternatives 2 and 3 are expected to demolish over twice as many housing units when compared to Alternative 1, which directs more development into undeveloped areas. In all alternatives, most of those units demolished are detached single unit houses where the previous residents could be homeowners or renters. A smaller number of demolished units are expected to be multifamily housing, which is much more likely to be occupied by renters. Demolition would occur gradually over time as individual properties are redeveloped.

Reduced Economic Displacement Pressure: With more growth focused in already developed areas along corridors and centers such as Division, Center City, and others, there is more development expected in areas with high displacement risk under Alternatives 2 and 3, compared to Alternative 1. This results in significantly more homes demolished in these areas. However, the flipside is also true. These neighborhoods would also receive more new housing production and greater diversity of housing options. This is expected to reduce economic displacement pressure compared to Alternative 1. See **Exhibit 1.4-3**.

Exhibit 1.4-3. Potential to Reduce Economic Displacement Pressure

Ability to Reduce Economic Development Pressure	Alt 1	Alt 2	Alt 3
Potential Capacity for New Housing Production	○	●+	●+
Potential Capacity to Increase Housing Diversity	○	●	●+
Anti-displacement Measures included in Plan and Programs	○	●+	●+

Legend: ○ = partially supports ●=supports + = optimally supports

Employment

- Based on the applied employment projections, Alternatives 1 and 3 increase the share of jobs relative to housing whereas Alternative 2 generally holds the current jobs/housing balance.
- The alternatives largely plan for industrial, both light and heavy, in similar locations as zoned under Alternative 1, but more intense employment is planned, particularly under Alternative 3.
- Alternative 1 would not update the City's economic development element policies or address additional commercial displacement strategies, whereas Alternatives 2 and 3 would make these updates.

What are some solutions or mitigation for impacts?

- Updates to the comprehensive plan under Alternatives 2 and 3 would address housing growth targets at all income levels, evaluate racially disparate impacts and displacement, and remove barriers to housing.
- The City of Spokane's 2021 Housing Action Plan provides short, medium, and long-term strategies to address the community's housing needs. A number of strategies have already been implemented.
- StartUp Spokane is a program of Greater Spokane Inc., which in partnership with the Spokane Public Library and Spokane County Library provides business resources for entrepreneurs.

- The Small Business Administration Strategic Alliance Memorandum was signed by the U.S. Small Business Administration, City of Spokane, and the AHANA Multi-Ethnic Business Association in September 2022. It establishes a heightened level of commitment to work together to bring services to underserved populations of entrepreneurs.
- Other strategies the City could consider include anti-displacement measures detailed in the Housing Action Plan and the updated housing element based on the City's racially disparate impacts evaluation, including a Rental Assistance Fund, Public Development Authority, land banking, use of development agreements, setting minimum density requirements, providing incentives for affordable commercial tenant space, and other efforts.

With mitigation, what is the ultimate outcome?

Over time, additional growth and development will occur through redevelopment as well as on vacant land. The alternatives vary based on the types and geographic pattern of existing housing and businesses that may be demolished and replaced by new growth. While this can contribute to the risk of physical displacement, the benefits in terms of reduced economic displacement pressure and increased production of affordable units offered by the action alternatives would address affordability in the marketplace, and the City's new policies and regulations would address anti-displacement measures. Therefore, no significant unavoidable adverse impacts to population, employment, or housing are expected under any alternative.

1.4.6 Relationship to Plans, Policies, and Regulations

How did we analyze Relationship to Plans, Policies, and Regulations?

The EIS team reviewed the state, regional, and local policy and regulatory framework, including the Growth Management Act, Countywide Planning Policies, Spokane Regional Transportation Council policies, THRIVE Spokane Comprehensive Economic Development Strategy, Spokane's existing comprehensive plan, and Spokane neighborhood and subarea plans.

Thresholds of significance used in this analysis include:

- Conflicts with the Washington State Growth Management Act or Spokane County Countywide Planning Policies.
- Inconsistency with adopted state, regional, county, or local plans and policies.

What impacts did we identify?

Alternatives 1, 2, and 3 each accommodate the 2046 growth targets and examine different ways the City could distribute its 2046 forecast growth with varying degrees of concentration. All alternatives have sufficient zoned vacant and redevelopable land to accommodate the overall 20-year population and housing targets and job projections. Overall, all alternatives support Growth Management Act goals related to transportation and urban services, and the key objectives of the City's neighborhood plans.

What is different between the alternatives?

Overall, Alternative 1 has the highest impacts while Alternatives 2 and 3 have lesser impacts.

- Alternative 1 would continue current plans and regulations that provide for urban growth served by transportation and urban services. However, Alternative 1 does not have sufficient land capacity to accommodate housing at all income levels, particularly 0-80% AMI. Alternative 1 does not meet HB 1181 requirements to include new climate resilience and greenhouse gas reduction goals and policies.
- All alternatives are fairly consistent with the Countywide Planning Policies, SRTC Metropolitan Transportation Plan, and THRIVE Spokane, but Alternatives 2 and 3 are better aligned with these policies. Alternatives 2 and 3 are also better aligned with the Spokane Downtown Plan and the South University District Subarea Plan.
- Alternatives 2 and 3 would each adopt a new growth strategy, and each element of the Comprehensive Plan would be updated. The plan would continue to focus growth in an urban area with a range of public services and multimodal transportation options, provide for public services like parks and schools, and protect critical areas and environments consistent with the GMA. Alternatives 2 and 3 include climate planning, with goals and policies that are consistent with HB 1181 and support improved climate resilience for vulnerable populations; these alternatives would also update the critical areas regulations.
- Alternatives 2 and 3 concentrate housing and job growth in the Logan neighborhood which supports the goals and objectives in the South Logan TOD Project and Plan, adopted by resolution in 2024. Alternative 3 has the highest jobs allocation, with focused investment in key employment centers, which supports locally adopted projects and subarea plans, including the South Logan TOD Plan, the Spokane Downtown Plan, and the South University District Subarea Plan, as well as the proposed Hillyard Subarea Plan.

What are some solutions or mitigation for impacts?

- Alternatives 2 and 3 meet housing targets at all income levels to address state housing requirements in HB 1220.
- Alternatives 2 and 3 include climate planning goals and policies in the Comprehensive Plan to implement state requirements of HB 1181 to have a Climate Element.
- As required by Growth Management Act, the City must submit proposed Comprehensive Plan amendments and updated regulations for review and comment by the State prior to final adoption.

With mitigation, what is the ultimate outcome?

No anticipated unavoidable adverse impacts are anticipated with respect to plans and policies. Inconsistencies with new regional plans and state requirements under Alternative 1 Stay the Course would be avoided through amendments to the Comprehensive Plan proposed under the action alternatives.

1.4.7 Transportation

Spokane Transit Authority CityLine Bus Rapid Transit (Rebecca White, 2023)

How did we analyze Transportation?

The thresholds used to determine the impacts of all three alternatives include both quantitative and qualitative assessments, which are described in **Exhibit 1.4-4.**

Exhibit 1.4-4. Transportation Thresholds of Significance

Performance Metric	Thresholds of Significance
Active Transportation Network Completeness	**Alternative 1 (No Action):** A significant impact is identified if the City cannot achieve 100% of the 2017 Bicycle Master Plan network by 2037 as established in the previous Spokane Comprehensive Plan (TR 5) or if pedestrian improvements are not advanced in designated Pedestrian Priority Zones. **Action Alternatives:** A significant impact is identified if network completion under the Action alternative lags relative to the No Action alternative or fails to accelerate progress toward bicycle and sidewalk network completeness.
Active Transportation Usage	**Alternative 1 (No Action):** A significant impact is identified if bicycle ridership fails to increase toward the 2017 Bicycle Master Plan goal of quadrupling by 2036 (relative to 2016 levels). **Action Alternatives:** A significant impact is identified if ridership increases are less than the No Action alternative.
Traffic Safety	**Alternative 1 (No Action):** A significant impact is identified if there is noncompliance with the City's Vision Zero resolution, adopted in late 2022, meaning there is an increased risk of any single traffic death or injury on City streets by 2042 (Vision Zero resolution horizon year). **Action Alternatives:** A significant impact is identified if an Action alternative would increase the likelihood of additional severe or fatal crashes compared to the No Action alternative.
Transit Access and Performance	**Alternative 1 (No Action):** A significant impact is identified if study intersection or corridor LOS falls below adopted standards (LOS F within Downtown and within designated Centers/Corridors; LOS E elsewhere) or if pedestrian/bicycle connections to STA facilities decline. **Action Alternatives:** A significant impact is identified if there is an impact according to the vehicle network performance thresholds for facilities used by transit.
Vehicle Network Performance	**Alternative 1 (No Action):** A significant impact is identified if vehicle operations fail to meet adopted intersection standards: LOS F (>120 seconds of delay) within the Downtown and the area bounded by and including the Spokane River, Maple Street, 5th Avenue, and Sherman Street, and within zones that are designated by the City as "Centers and Corridors"; LOS E applies elsewhere. For state routes, an impact occurs if a state facility does not meet the standard set by WSDOT (LOS D, segment volume-to-capacity (v/c) 1.00). **Action Alternatives:** A significant impact is identified if an intersection (city or state facility) degrades from an acceptable LOS in the No Action scenario; if the intersection already exceeds LOS thresholds in the No Action scenario, then an impact is identified if delay increases by 5 or more seconds. For state route segments, a significant impact

Performance Metric	Thresholds of Significance
	is identified if the segment v/c increases by ≥0.05 at a location already at or above 1.00 under the No Action alternative.
VMT per Capita and Mode Share	Alternative 1 (No Action): A significant impact is identified if daily VMT per capita increases by ≥ 1.0 miles/person or if SOV (drive alone) share increases by ≥ 1.0 percentage point over 2024 conditions. Action Alternatives: A significant impact is identified if daily VMT per capita increases by 0.2 miles/person or if SOV share increases by 0.2% relative to the No Action alternative.

Sources: City of Spokane, WSDOT, SRTC, Fehr & Peers, 2025

What impacts did we identify?

Exhibit 1.4-5 summarizes impact findings across the alternatives. The purpose of this programmatic EIS is to disclose how potential land use may affect the transportation system relative to what would occur with currently adopted designations and policies (the No Action alternative). Accordingly, the impacts of each Action alternative are assessed against the performance of No Action. Impacts expected to occur as a result of the No Action alternative are also expected under the Action alternatives, even if the Action alternatives do not result in additional significant impacts.

The Action alternatives perform similarly across categories. Relative to No Action, VMT and VMT per capita decrease under both Action alternatives, so no significant impacts to VMT per capita or safety are identified for the Action Alternatives.

For the vehicle network, measured with intersection LOS, the Action alternatives would not result in additional impacts beyond the performance expected with the No Action alternative. The same intersections serve transit and freight, so no additional impacts are identified for these categories.

No significant impacts to state facilities, the pedestrian network, the bike network, or mode share are expected with any of the alternatives.

Across all studied locations and all three alternatives, v/c ratios are expected to remain below 1.0; therefore, no significant state facility impacts are identified. The pattern shows modest growth and small differences among alternatives, with the following corridors nearing but not exceeding capacity:

- I-90 west of Sprague Avenue (Spokane Valley) operates at v/c of 0.88–0.90 across alternatives
- US 2 east of the Sunset Frontage Road intersection operates at v/c of 0.83–0.84
- SR 902 south of the Geiger Blvd wye connection operates at v/c of 0.87–0.89

Exhibit 1.4-5. Summary of Significant Impacts

Impact Type	Alternative 1 — No Action	Alternative 2	Alternative 3
Pedestrian Network	None	None	None
Bicycle Network	None	None	None
Transit	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action
Safety	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action
VMT per Capita	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action
Mode Share	None	None	None
Vehicle Network (Intersection LOS)	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action
State Facilities	None	None	None
Freight	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action

Source: Fehr & Peers, 2025

What is different between the alternatives?

Vehicle Miles Travelled

All of the alternatives study housing growth to the growth target level with Alternative 1 having a greater share of single-family housing than Alternatives 2 and 3 which add more attached housing in the downtown and frequent transit corridors. Alternative 2 studies the lowest job growth, and Alternative 3 the highest with Alternative 1 in the middle.

With Alternative 2, total vehicle miles traveled (VMT) in Spokane are expected to be slightly lower than with the No Action Alternative. VMT is expected to decrease to 5,732,000 on an average weekday, 3.3% below the No Action alternative. This translates to a VMT per capita decreases from 19.9 (No Action) to 19.2 (Alternative 2). This reduction reflects the “distributed & balanced” growth pattern placing more new housing and jobs in established centers and along frequent transit corridors, for example the Center City and the Division Street areas, which would shorten average trip lengths. It also reflects slightly lower job growth than Alternative 1 and Alternative 3, more similar to the current jobs/housing balance. See **Exhibit 1.4-6**.

With Alternative 3, total vehicle miles traveled in Spokane are expected to be 5,916,000 on an average weekday, which is slightly below the VMT with No Action and slightly higher than VMT with Alternative 2.

This translates to a VMT per capita decrease from 19.9 (No Action) to 19.8 (Alternative 3). This slight decrease reflects growth focused in the Center City and select regional hubs, which brings more trips closer to destinations and frequent transit routes. However, although Alternative 3 places more housing and jobs in the Center City than Alternative 2, it also assumes continued employment growth in industrial hubs, most notably the West Plains/Airport area and Northeast/Hillyard, which increases trips and yields higher total VMT than Alternative 2. See **Exhibit 1.4-6**.

Exhibit 1.4-6. Existing (2024) and Alternatives VMT per Capita

	Existing (2024)	2046 Alt 1 (No Action)	2046 Alt 2	2046 Alt 3
VMT per Capita	17.9	*19.9*	*19.2*	*19.8*

Sources: SRTC, Fehr & Peers, 2025

Compared to No Action, Alternative 2 is expected to have a slight shift from shared-ride vehicular trips to active modes with approximately 86,400 walking trips and 16,700 biking trips on an average weekday, about 900 more walk trips and 100 more bike trips than No Action. See **Exhibit 1.4-7**.

Compared to No Action, Alternative 3 is expected to have a slight shift from shared-ride vehicle trips to active modes with approximately 88,600 walking trips and 17,000 biking trips per day, which is about 3,100 more walk trips and 400 more bike trips than No Action. This is greater than the expected added non-motorized trips than Alternative 2. See **Exhibit 1.4-7**.

Exhibit 1.4-7. Mode Share – Existing and Alternatives

Mode	Existing (2024)	2046 Alt 1 (No Action)	2046 Alt 2	2046 Alt 3
Drive alone (SOV)	50.6%	*50.3%*	*50.3%*	*50.3%*
Shared ride (HOV)	39.5%	*39.5%*	*39.3%*	*39.3%*
Transit	1.2%	*1.2%*	*1.2%*	*1.2%*
Walk	7.3%	*7.5%*	*7.7%*	*7.7%*
Bike	1.4%	*1.5%*	*1.5%*	*1.5%*

Sources: SRTC, Fehr & Peers, 2025

Safety

Under No Action, population and employment growth are expected to increase the number of trips taken and average trip distances relative to Existing (2024). As a result, total VMT and VMT per capita are higher than Existing. This increase in VMT and VMT per capita translates into increased exposure on the transportation network and a corresponding increase in the number of severe and fatal crashes that could occur relative to Existing, which exceeds the threshold of significance identified for this EIS.

Under Alternative 2, total VMT and VMT per capita are lower than No Action due to the land use pattern that assigns more growth in centers and along transit corridors, which reduces trips and average trip distances. This translates into reduced exposure on the transportation network and a potential reduction in the number of severe and fatal crashes.

Under Alternative 3, total VMT and VMT per capita are lower than No Action, reflecting the land use pattern of Alternative 3 that assigns more growth in centers and along transit corridors, which reduces trips and average trip distances. Compared to No Action, the corresponding reduction in VMT and VMT per capita translates into reduced exposure on the transportation network and a potential reduction in the number of severe and fatal crashes.

Vehicle Network, Transit, Freight

Compared to Existing (2024), 10 intersections are expected to remain at the same LOS, and 12 are expected to decline by one or more LOS grade. Despite the increase in delay, 16 of 22 intersections are still expected to meet their LOS standard under No Action. See **Exhibit 1.4-8**.

Compared to No Action, 17 of 22 study intersections are expected to meet their applicable LOS standard with Alternative 2 or Alternative 3, an improvement over No Action, where 16 of 22 met the standard. The SR 291/W Francis Avenue and N Alberta Street intersection is expected to operate with lower delay such that it would meet its LOS D standard (No Action LOS E), and SR 290/E Trent Avenue and N Hamilton Street would operate at LOS E rather than LOS F (still failing to meet the standard of LOS D).

Four of the remaining locations that would fail to meet the LOS standard under Alternative 2 are S Hatch Road and E 57th Avenue, US 2/N Division Street and W Wellesley Avenue, US 2/N Division Street and W Francis Avenue, and US 2/W Sunset Highway and Flint Road. At US 2/W Sunset Highway and Flint Road, LOS would remain at F and delay would rise from 145 seconds (No Action) to 148 seconds (Alternative 2), which is a 3 second increase and therefore below the Action alternative threshold of 5 seconds. At S Hatch Road and E 57th Avenue, US 2/N Division Street and W Wellesley Avenue, and US 2/N Division Street and W Francis Avenue, delay is incrementally reduced relative to No Action and LOS categories are unchanged.

The remaining locations failing to meet standard under Alternative 3 are S Hatch Road and E 57th Avenue, US 2/N Division Street and W Wellesley Avenue, US 2/N Division Street and W Francis Avenue, and US 2/W Sunset Highway and Flint Road. At these intersections, delay is incrementally improved compared to the No Action alternative.

Exhibit 1.4-8. Spokane Intersection LOS – All Alternatives

Study Intersection	LOS Standard	2046 Alt 1 (No Action) LOS	2046 Alt 2 LOS	2046 Alt 3 LOS
S Hatch Rd and E 57th Ave (One-way stop control)	E	**F**	***F***	***F***
S SE Blvd and E 29th Ave	E	D	*D*	*D*

Study Intersection	LOS Standard	2046 Alt 1 (No Action) LOS	2046 Alt 2 LOS	2046 Alt 3 LOS
S Grand Blvd and E 29th Ave	E	C	*C*	*C*
N Havana St and E Sprague Ave	E	E	*D*	*D*
N Napa St and E Sprague Ave	E	C	*C*	*C*
SR 290/E Trent Ave and N Hamilton St	D	**F**	***E***	***E***
US 2/S Division St and E Sprague Ave*	F	C	*C*	*C*
US 2/N Ruby St and E Indiana Ave*	D	D	*D*	*D*
US 2/N Division St and W Buckeye Ave/E North Foothills Dr	D	C	*C*	*C*
US 2/N Division St and Wellesley Ave	D	**F**	***F***	***F***
US 2/N Division St and W Francis Ave*	D	**E**	***E***	***E***
US 2/N Newport Hwy and E Holland Ave	D	D	*D*	*D*
W 3rd Ave and S Monroe St	F	B	*B*	*B*
N Maple St and W Boone Ave	E	C	*C*	*C*
E Mission Ave and N Hamilton St	E	D	*D*	*E*
N Market St and E Euclid Ave	E	D	*D*	*D*
N T J Meenach Dr and W Northwest Blvd*	E	E	*E*	*D*
N Ash St and W Wellesley Ave	E	C	*C*	*C*
E Wellesley Ave and N Haven St*	E	E	*E*	*E*
N Market St and E Francis Ave	E	D	*D*	*D*
SR 291/W Francis Ave and N Alberta St	D	**E**	*D*	*D*
US 2/W Sunset Hwy and Flint Rd	D	**F**	***F***	***F***

Notes: *Analyzed with HCM 2000; **BOLD** indicates LOS fails to meet standard
Sources: City of Spokane, WSDOT, Fehr & Peers, 2025

For the No Action alternative, the following intersections fail to meet LOS standards and could have an a significant impact to freight corridors and fixed transit routes: US 2/Sunset Highway and Flint Road (LOS F), US 2/Division Street and Wellesley Avenue (LOS F), US 2/Division Street and Francis Avenue (LOS E), and SR 291/W Francis Avenue and N Alberta Street (LOS E).

For Alternative 2, no significant intersection impacts are identified compared to the No Action alternative, so relative transit and freight performance would be maintained.

Under Alternative 3, no significant intersection impacts are identified relative to the No Action alternative; all intersections that exceed LOS thresholds would either maintain or improve LOS and delay relative to No Action.

What are some solutions or mitigation for impacts?

Several projects and policies are included in the analysis and serve as baseline mitigation because they improve traffic operations, safety, and multimodal access for all alternatives.

- US 2/Division Street and NSC
- City Line and STA High-Performance Transit (HPT)
- Pedestrian and Bike Master Plans
- Vision Zero and Complete Streets

Spokane's existing regulatory framework ensures that transportation improvements keep pace with growth and safety needs.

- Concurrency and impact fees link development to capacity projects. When thresholds are exceeded, intersection and corridor upgrades are advanced as part of the City's capital program.
- Frontage improvement requirements ensure that adjoining sidewalks, curb ramps, crossings, and bike elements are implemented to current standards as sites redevelop.
- The City also maintains partnerships with WSDOT and STA. With WSDOT, the focus is on coordination between projects, such as the NSC, and traffic operations.
- With STA, coordination centers on transit projects, such as Division Street BRT and future HPT corridors, to ensure accessibility for future ridership demand.

A range of programmatic strategies could be implemented to reduce the impact of the growth alternatives evaluated within this EIS:

- Transportation Demand Strategies (TDM)
- TSMO and Signal Timing
- Agency Partnerships

Working closely with WSDOT, Spokane Transit Authority (STA), Spokane County, and the Spokane Regional Transportation Council (SRTC), some additional programmatic efforts could include:

- Implementing the Commute Trip Reduction (CTR) program, including CTR Four-Year Plan Update (2025–2029) providing employers, residents, and students with a mix of education, incentives, and resources to facilitate mode shift.
- Transportation Systems Management & Operations (TSMO) is a programmatic strategy that improves reliability with intelligent transportation systems (ITS) and operational refinements rather than major construction. Core tools include periodic signal retiming and coordination, refined phase/split/offset plans, protected–permissive turn phasing and right-turn overlaps, leading pedestrian intervals and updated pedestrian clearance, upgraded detection and, where appropriate, transit signal priority and queue jumps.
    - For the intersection of SR 290/E Trent Avenue and N Hamilton Street, the South Logan Transit-Oriented Development (TOD) Plan identifies signal tools such as signal phase adjustments and

right-turn overlaps to maintain operations as the area develops. This EIS is consistent with that approach, and the same signal timing adjustments can be implemented and adjusted as volumes grow.

- Complementary TSMO strategies including wayfinding and driver information to parallel routes like the adjacent Martin Luther King Jr Way corridor can help redistribute peak traffic and avoid oversaturation of the intersection. Together, these programmatic measures paired with ongoing monitoring and retiming can maintain operations as land-use activation occurs.
- Partnering with the County and other regional agencies on a unified TDM program leverages resources to provide a robust program with opportunities for targeted programs within the City.

With mitigation, what is the ultimate outcome?

Relative to No Action, the action alternatives maintain or incrementally improve mode share and have lower VMT per capita, which translates into slight improvements or no change in transit, freight, and safety performance. The action alternatives would not cause any additional intersections to fall below standards, and for intersections that already fall below the LOS standard under No Action, the action alternatives would add less than 5 seconds of average control delay relative to No Action. In addition, the Action alternatives would maintain all evaluated state facilities below a v/c ratio of 1.0 and would not degrade pedestrian or bicycle operations at the citywide scale. Therefore, applying the thresholds of significance, neither action alternative is expected to result in a significant adverse transportation impact.

1.4.8 Public Services

Cart Tagging, Recycling, City of Spokane, Undated.

How did we analyze Public Services?

The EIS team reviewed current conditions for police, fire and emergency medical services (EMS), schools, parks, libraries, and solid waste. The team also analyzed environmental justice implications related to EMS and parks and health.

Thresholds of significance used in this analysis include:

- **Police/Fire/EMS** – Increased demand for police or fire and emergency that cannot be accommodated through regular planning and staffing processes.
- **Schools** – Increased public school enrollment and demand on capital facilities, and broadband that cannot be addressed through regular school planning processes.
- **Parks** – Decreased park level of service (LOS), as defined in the Spokane Parks Master Plan (acres of developed park land per 1,000 people, and percent of households that can reach a public park or school ground in 10-minute walk)
- **Libraries** – Recommended square feet per capita LOS not met, as defined in the City of Spokane Capital Facilities Plan

- **Solid Waste** – Collections per household per month that would result in major investments exceeding what is already planned.
- **Environmental Justice**
  - Growth in areas with existing health disparities would result in increased demand on emergency medical services and impact response times.
  - Growth in areas with high social vulnerability would result in greater pressure on existing parks and recreation services.

What impacts did we identify?

There is a similar citywide range of population expected under all alternatives, and there will be a greater demand for police, fire/emergency medical services, schools, parks, libraries, and solid waste under all alternatives. This includes a need for more police officers, more fire and EMS staff, more school capacity, more parks, more library square footage, and more solid waste collection positions. All alternatives also plan for growth in areas with existing health and social disparities. This may have impacts on public services by creating more demand for emergency services and parks in certain areas of Spokane. All three alternatives place between 31 and 34% of growth in areas with a high percentage of self-reported poor physical health, which may increase demand for emergency services where there is already higher demand – Alternative 1 places 31% of growth in places where people report poorer physical health and Alternative 3 the most at 34%. All alternatives also place between 23 and 27% of growth in areas with high social vulnerability, with Alternative 1 at 23% and Alternative 3 at 27%.

What is different between the alternatives?

All alternatives are expected to have impacts to public services but will affect different parts of the city differently based on where growth is distributed.

General Public Services

- Alternative 1 would increase demand in the Center City and in existing centers and corridors and particularly in less developed areas of the city (such as Northwest and South).
- Alternatives 2 and 3 would reinforce growth in already developed areas with Alternative 2 mostly focused on frequent transit corridors and Alternative 3 in the Center City and Regional Hubs and selected transit corridors though more growth is planned in the South as well. These areas would therefore see greater demand for public services.

Schools

- Under Alternatives 2 and 3, Spokane School District is expected to add over 500 more new students than under Alternative 1. In contrast, Alternative 1 would place more growth in the Mead School District, resulting in about 600 more students than Alternatives 2 and 3.

What are some solutions or mitigation for impacts?

- The adopted Comprehensive Plan and Capital Facilities Plan include policies that support planning for levels of service, operations, maintenance, funding, and capital projects for public services.

- The adopted Parks and Natural Lands Master Plan includes levels of service and policies to support park development to meet current and future City needs.
- An increase to local sales and use tax to support a Public Safety Tax for criminal justice and fire protection became effective April 1, 2025.
- Local plans for emergency management, fire department strategy, and police department strategy also support service improvement.
- Alternatives 2 and 3 include a new Climate Element, which includes goals and policies to support climate resiliency of City functions, including emergency services, like police, fire, and EMS, and parks.
- Alternatives 2 and 3 include a new Spokane Capital Facilities Plan, which updates the adopted plan to address city services (e.g., police, fire, parks, solid waste) align with other providers' plans (e.g., schools) and current population numbers.
- Impact fees for schools, parks, or fire could support increased staffing and capacity to address ongoing growth, if other funding streams are unable to match needs.
- The City could investigate opportunities for increased parks access such as a fee-in-lieu program or park land dedications in key locations.
- Partnerships could support growing education and park needs.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts are expected. Impacts to police, fire/EMS, schools, parks, and solid waste, including environmental justice-related impacts, can be managed through regular planning, staffing processes, and mitigation measures.

1.4.9 Utilities

Avista Building, Maren Murphy, City of Spokane, 2018.

How did we analyze Utilities?

The EIS team reviewed Spokane's power, water, wastewater, and stormwater systems, including how services are provided, the infrastructure involved, utility usage data, and plans to address future growth.

Thresholds of significance used in this analysis include:

- Impacts would require major unplanned capital improvements within Avista's power service network.
- Impacts would require major unplanned capital improvements within the City's potable water system.
- Impacts would require major unplanned capital improvements within the City's sewer system.
- Impacts would require major unplanned capital improvements to prevent flooding at frequencies and durations beyond design expectations.

What impacts did we identify?

Each alternative will see growth throughout the study area which will require planning and adjustment of capital improvement projects to address changes in utility demands. Special consideration should be given to power substations, power generators, wells, pump stations (water, sewer, and stormwater), reservoirs, water reclamation facilities, sewer siphons, combined sewer overflows (CSOs), and stormwater infiltration facilities.

What is different between the alternatives?

All alternatives are expected to have impacts to utilities but will affect different parts of the city differently based on where growth is distributed.

Energy

- Alternative 1 is consistent with Avista's energy needs forecasting as the utility has a plan to address growth along the current trajectory.
- Alternative 2 would concentrate much of the growth around transit routes and increase mixed-use and multi-unit growth throughout the city. From a power distribution standpoint, if there are more concentrated users, this should increase the efficiency of the power network and reduce total usage. This may result in the need to upgrade existing infrastructure to address growth in the areas surrounding the transit routes.
- Similarly, concentrated growth under Alternative 3 in the downtown area and greater mixed-use and multi-unit growth throughout the city would increase the efficiency of the power network and reduce total usage. This higher concentration in these central areas may require additional generation or transmission capacity.

Water

- Alternative 1 has the largest growth in single-unit housing, which typically creates larger water usage peaks for irrigation in the irrigable months (April through October). Even so, the City's water system would be able to serve that projected growth.
- Concentrating growth along corridors under Alternative 2 would be a net benefit to a water system, but along some corridors (e.g., Wellesley Ave, Francis Ave) the City may need to upgrade existing infrastructure or construct new infrastructure. Alternative 2 increases the mixed-use and housing density along Northwest Blvd, Francis Ave, and Wellesley Ave, which could increase the need for production and storage in the Low and North Hill pressure zone.
- Alternative 3 concentrates growth in central areas of the city, which is a net benefit to a water system, but concentrated growth may require expansion of transmission, production, and storage in the Low, North Hill, Intermediate, High, and Top Pressure zones.

Sewer

- The difference in sewer usage between single unit and multi-unit connection depends on the density of the development; more dense clusters of single unit and multi-unit developments will see larger

flows. While there will be an increase in sewer demand, the City has a plan to address needs as the system expands in Alternative 1 since it aligns with existing planning.

- With growth in Alternative 2 increasing along the Northwest Blvd, Francis Ave, and Wellesley Ave corridors, as well as in the West Plains, this could result in the need to expand capacity at the Francis, Cannon, and Clarke Ave pump stations as well as the Latah Creek Siphon.
- With growth in Alternative 3 increasing downtown, as well as in the West Plains, this could require improvements to the Post Street Bridge Trunk Line and Clarke Ave pump station, as well as the Latah Creek Siphon.

Stormwater

- There will be an increase in stormwater flows, but the City has a plan to address needs as the system expands in Alternative 1 since it aligns with existing planning.
- Alternative 2 converts much of the growth into mixed-use and multi-unit developments which could reduce the stormwater generated overall.
- Alternative 3 concentrates most of the growth in the downtown area where there is already a lot of development. Since redevelopment is unlikely to increase stormwater runoff, other than maintaining the existing stormwater mitigation standards, no further action is likely needed.

What are some solutions or mitigation for impacts?

- City programs and policies reduce water use through grants for low water use landscaping, requirements for onsite stormwater treatment, disposal for new developments, and targeting infrastructure improvements in historically underserved areas.
- The City plans to update its level of service standards for water service to better align with the Washington Department of Health's (DOH) standards.
- The City will update utility plans following the Periodic Update. City codes regulating construction and future utility investments will continue to ensure new development addresses any service or capacity constraints.
- The City and Avista regularly plan and adapt to changing growth patterns and are currently engaged in efforts to improve the water system and address long-term demand and climate change effects on water supplies and the aquifer, address wastewater and drainage system capacity, meet electrical demand, and increase the resiliency of their utility systems to growth and impacts of climate change.
- Federal, state, and local codes support the provision of safe, reliable utilities.
- The City could consider additional measures such as expanding local energy resources, investing in infrastructure to improve energy efficiency, upgrading stormwater infrastructure, minimizing runoff, protecting critical aquifer recharge areas, and implementing community-based water use efficiency.

With mitigation, what is the ultimate outcome?

None of the alternatives are anticipated to create significant unavoidable adverse impacts to the ability of the City or Avista to deliver utility services to the population of Spokane

2 Proposal and Alternatives

2.1 Introduction

2.1.1 Overview of the Proposal

The City of Spokane (Spokane) is preparing a periodic update to its Comprehensive Plan for the period 2026 to 2046. The Periodic Update addresses new growth targets for population and housing and will meet amendments to the Growth Management Act (GMA) since that last periodic update in 2017. Every chapter of the current Comprehensive Plan, except for the Shorelines Chapter which will be updated in accordance with State regulations in 2031, will be amended including the vision, values, goals, and policies. Major changes include addressing GMA requirements for housing affordability and anti-displacement measures, updating multimodal levels of service and reducing vehicle trips, and planning for climate resilience and greenhouse gas reductions.

What you will find in this chapter

Chapter 2 Proposal and Alternatives:

- Identifies Comprehensive Plan Periodic Update proposals
- Describes City objectives to achieve its vision and state laws
- Includes alternative ways to meet objectives
- Shares public outreach results and activities planned with the EIS
- Describes the SEPA process before, during, and after the Draft EIS
- Summarizes benefits and disadvantages of delaying proposals

The Land Use Plan Map, a component of the Land Use Chapter that outlines how different areas of the city are designated for various uses, is proposed for amendment to simplify its implementation and to respond to growth targets, community needs, transportation investments, and environmental conditions. Zoning and development regulations are also proposed to be amended to help ensure the City meets its housing affordability targets, and to promote transit-oriented development along major transit facilities. The City is also reviewing its critical areas regulations to address State rules and guidance.

Additionally, the City is considering tools to streamline environmental review under the State Environmental Policy Act (SEPA), such as housing and infill development categorical exemptions (RCW 43.21c.229) and raising minor new construction thresholds (WAC 197-11-800.

2.1.2 Alternatives

Consistent with the State Environmental Policy Act (SEPA), this Draft Environmental Impact Statement (EIS) identifies and analyzes a range of alternatives that describe different growth strategies to help the City prepare the Periodic Update. These alternatives include a “no action alternative” and two “action alternatives”:

- **Alternative 1, Stay the Course:** This SEPA required Alternative (**No Action Alternative)** is the continuation of the current Comprehensive Plan and associated zoning and regulations.

- Under this Alternative, the Comprehensive Plan and development regulations would not be updated. However, growth would still occur under this alternative under current rules—it does not assume zero growth over time.
- Alternative 1 has capacity to meet total housing and population targets but would not provide sufficient capacity for housing at income levels 0-80% of the area median income (AMI as determined by the Federal Housing and Urban Development Department for Spokane County).
- This Alternative assumes jobs would grow consistent with regional Spokane Regional Transportation Council (SRTC) projections. See **Exhibit 2.1-1** below.

- **Alternative 2, Distributed and Balanced: Alternative 2** adds greater housing and job intensity along frequent transit routes and prioritizes a **jobs/housing balance**.
  - Alternative 2 applies recommendations from the adopted Centers and Corridors Study (2024) to better consider market conditions and zoning best practices, including the use of mixed-use land use and/or zoning designations.
  - Alternative 2 encourages neighborhood/small scale retail.
  - Alternative 2 provides sufficient capacity to meet housing and population targets, including creating greater capacity of housing types that are affordable to all income levels.
  - To evaluate the phasing of infrastructure needs, Alternative 2 would have a job growth level similar to State Employment Security Department (ESD) trends. See **Exhibit 2.1-1** below.
  - This Alternative simplifies the land use plan so that there are fewer land use designations, which are then implemented by multiple zones.
  - Alternative 2 facilitates growth through an infill exemption under SEPA (RCW 43.21c.229), where the EIS provides upfront evaluation of residential and mixed-use growth along frequent transit routes, and documents plans or development regulations that provide mitigation measures. The City may also raise SEPA thresholds citywide (WAC 197-11-800) or in targeted areas in the city.
  - Alternative 2 includes anticipated climate resilience and greenhouse gas reduction goals and policies per HB 1181. It would also review and update critical areas regulations.
- **Alternative 3, Center City and Regional Hubs:** Alternative 3 adds greater housing and job intensity in the City of Spokane's downtown vicinity called the "Center City" and in employment centers in Southwest and Northeast Spokane.
  - Alternative 3 focuses housing growth in regional hubs, particularly Center City and selected corridors.
  - Alternative 3 concentrates industrial jobs in West Plains and Northeast Spokane, and additional education/health jobs in the City Center and University areas.
  - City investments prioritize certain centers and major corridors to maximize impact of designation. Designations in other areas are removed or modified where appropriate, while still considering livability/streetscape improvements.
  - Alternative 3 meets housing targets at all income levels.

- Alternative 3 establishes the highest jobs allocation that focuses investments in areas with existing/planned transportation infrastructure (Downtown transit and street network, airport, rail corridors, North Spokane Corridor or NSC). See **Exhibit 2.1-1** below.
- Like Alternative 2, Alternative 3 simplifies the land use plan so that there are fewer land use designations, which are then implemented by multiple zones.
- Like Alternative 2, Alternative 3 facilitates growth through an infill exemption (RCW 43.21c.229) along frequent transit routes, particularly bus rapid transit. The City may also raise SEPA thresholds citywide (WAC 197-11-800) or in targeted areas in the city.
- Alternative 3 includes anticipated climate resilience and greenhouse gas reduction goals and policies per HB 1181. It also reviews and updates critical areas regulations.

Exhibit 2.1-1. Employment Growth and Alternatives

Spokane County and its cities do not formally allocate job targets. The City of Spokane's EIS Alternatives can evaluate a range of potential job growth to help the City consider its role as a regional job center, the balance of housing and jobs for its community, and ensure it plans appropriately for infrastructure avoiding over-investment or under-investment. All of the alternatives incorporate job growth projections higher than the 20-year historic trend (2002-2022). However, Alternative 2 Distributed and Balanced reviews job growth similar to State Employment Security Department (ESD) projections (2022-2037) and with a jobs/housing balance similar to the current balance. Alternative 2 employment projections, while greater than trend, are lower than the Spokane Regional Transportation Council (SRTC) projections incorporated into Alternative 1 Stay the Course. Alternative 3 Center City and Regional Hubs focuses job growth in major centers and hubs like the Center City and the West Plains and Hillyard areas and tests job growth moderately higher than Alternative 1. Using different job outlooks can help the City consider the timing of infrastructure needs based on varying future predictions and does not necessarily indicate that one alternative would remove potential job opportunities while another would add. While job assumptions vary, both Alternative 2 and 3 focus on ways to increase start-up and business expansions through focused investments in public infrastructure.

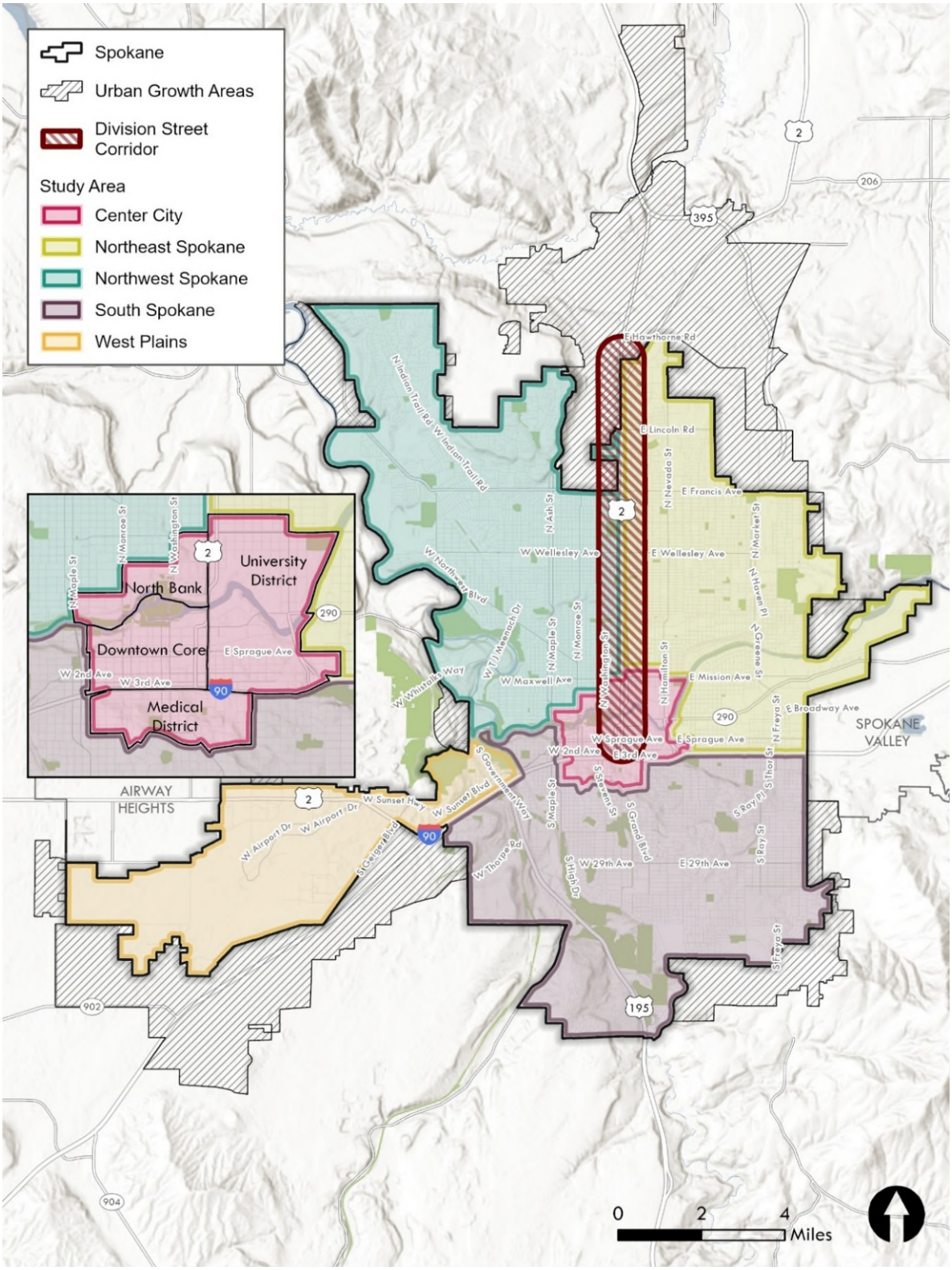
2.1.3 Study Area

This EIS primarily focuses on the Spokane city limits. The city study areas in **Exhibit 2.1-2** are referenced in the EIS:

- Northwest Spokane
- Northeast Spokane
- South Spokane
- West Plains
- Center City, overlapping several study areas, including Downtown Spokane
- Division corridor, straddling Northwest and Northeast Spokane

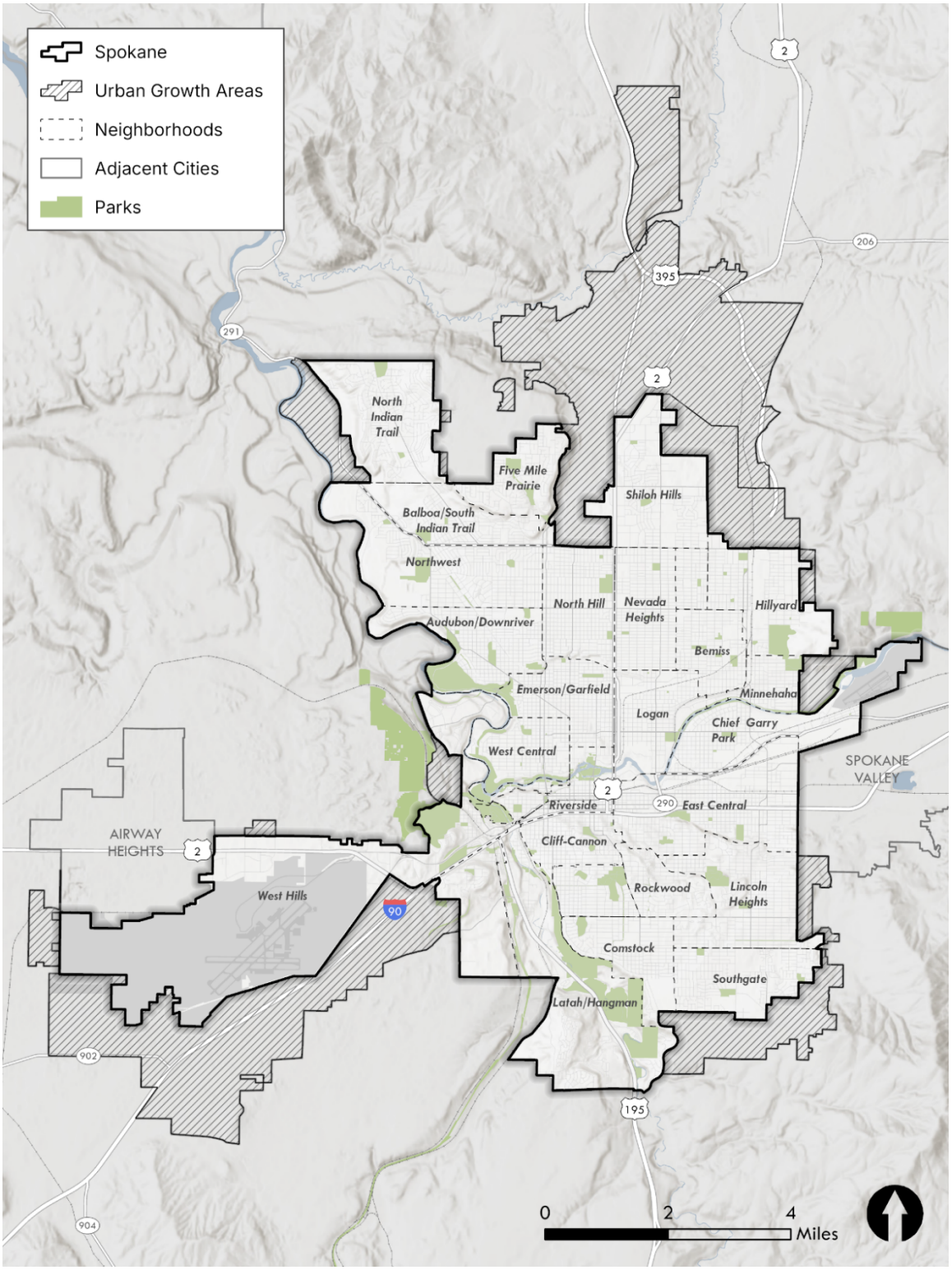
Within these broad subareas the EIS cites Neighborhood Council boundaries. See **Exhibit 2.1-3**.

Exhibit 2.1-2. Spokane Study Areas



Sources: City of Spokane, BERK, 2025.

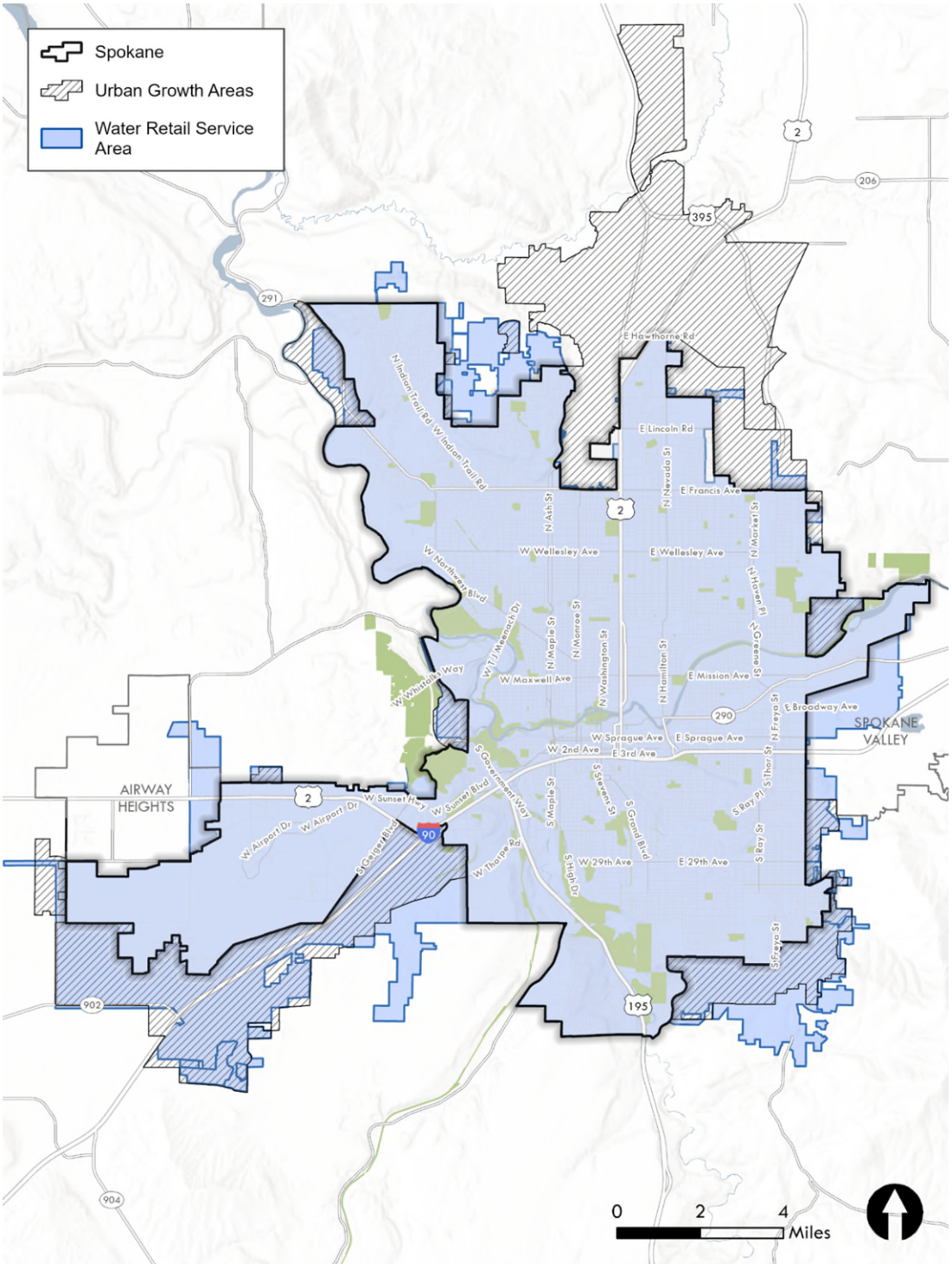
Exhibit 2.1-3. City of Spokane Neighborhoods



Note: Peaceful Valley, Grandview/Thorpe, Browne's Addition, and Whitman neighborhoods are shown but too small at this scale to label.
Sources: City of Spokane, 2024; BERK 2024.

Secondarily, the EIS addresses abutting unincorporated urban growth areas (UGAs) and currently adopted utility service areas, for example, considering land use compatibility and growth trends. See **Exhibit 2.1-4**.

Exhibit 2.1-4. Existing Water Retail Service Areas



Source: City of Spokane, 2025.

2.1.4 Objectives of the Proposal

Objectives are required by SEPA to identify the purpose and need of the proposals and to compare alternatives according to WAC 197-11-440 and -442. Objectives are particularly important when comparing long-range plans like the City of Spokane Comprehensive Plan Periodic Update. This EIS compares alternatives for their ability to meet these objectives:

- **Meet Periodic Update Requirements:** Comply with Comprehensive Plan periodic review requirements to meet state laws including recent changes to the GMA regarding providing capacity for more housing types and affordability levels, increasing resiliency to climate impacts, evaluating tree canopy coverage, increasing opportunities for active transportation, reducing vehicle miles traveled and greenhouse gas emissions, addressing needs of overburdened communities, increasing green infrastructure, planning for jobs and economic development, and more.
- **Accommodate Growth:** Demonstrate population, transportation, and housing capacity to accommodate growth targets through 2046 based on State projections and County allocations in consultation with the City and ensure City utilities and services are expected to have sufficient capacity to serve that growth.
- **Clarify the Plan:** Update policies that are inconsistent, outdated, duplicative, or unclear.
- **Simplify the Plan and Codes:** Update and simplify future land use map categories and zoning districts and reflect any new designations such as within centers and corridors.
- **Protect Critical Areas:** Update critical area regulation updates that respond to best available science.
- **Fast-Track Desired Growth:** Facilitate desired growth in priority locations through permit streamlining, such as through SEPA infill exemptions or raising SEPA thresholds.

A vision statement, goals, or values in a plan can serve as objectives. The City's proposed draft vision statement for the Periodic Update is also considered an objective:

> *Spokane aims to foster a vibrant, resilient, and inclusive city by supporting economic growth, environmental stewardship, and the diverse needs of the whole community. The City is dedicated to ensuring access to attainable housing, safe streets, and thriving neighborhoods while inspiring innovation, cultural vitality, and connection for all Spokane residents.*

This vision incorporates PlanSpokane 2046 themes of Resilient, Connected, and Livable, as well as public engagement themes of Nature, Community, Livability, and Innovation. See **Section 2.2.3** for additional context about public engagement themes.

2.2 Planning Context

2.2.1 Growth Management Act

State Periodic Update Requirements

The GMA requires that most cities and counties in the state with larger and growing populations – like Spokane County, City of Spokane, and surrounding cities – prepare a comprehensive plan and development regulations meeting state goals such as focusing growth in urban areas, providing opportunities for housing and economic development, protecting critical areas, investing in infrastructure and transportation, instituting fair and predictable permit processes, and encouraging community participation.

A comprehensive plan provides guidance for all aspects of the city's growth and development over a long period, typically 20 years. The plan is made up of a vision, goals, policies, and implementation strategies that state how the city should grow physically, socially, and economically. The City of Spokane's first GMA compliant Comprehensive Plan was adopted in 2001 and was last updated, aside from minor annual amendments, in 2017. It is the product of many people, including hundreds of community members, the Spokane Plan Commission, City Council, and Mayor.

Spokane is preparing a periodic update to the City's Comprehensive Plan for a new planning period of 2026 to 2046. Called PlanSpokane 2046, this is the most significant update since the plan was originally written in 2001. Distinct from small annual amendments made along the way, a "periodic update" is a full review of a comprehensive plan to make sure it complies with any legislative changes to state law. Each chapter of the plan, excluding the Shorelines Chapter, will be updated to address new growth targets for population and jobs and to meet changes to the GMA since 2017, including considerations around Climate Planning and Planning for Housing at all income levels made by HB 1220. In **Section 2.2.3 Growth Targets and Alternatives**, the action alternatives 2 and 3 further the City's compliance with HB 1220 requirements to meet affordable housing targets, remove barriers in plans and codes, and implement measures to reduce racially disparate impacts.

The GMA and HB 1110 require inclusion of middle housing in single family areas, and the City has largely implemented those requirements following its Housing Action Plan and the following Building Opportunity for Housing code project. All of the EIS alternatives studied incorporate middle housing.

Transit-Oriented Development

Placing housing, retail, and services near frequent transit routes together with access to comfortable sidewalk environments provides more choices for living environments in Spokane and ways to more easily reach employment, recreation, and other destinations without having to use a car. The City Line is an existing bus rapid transit line that serves the Center City (Downtown, University, South Logan) and parts of Northeast Spokane (Chief Garry Park).

Goals for transit-oriented development (TOD) are woven into the current Comprehensive Plan, subarea plans, and zoning code, and seek to:

- Improve quality and safety of streetscapes, building frontages, and public spaces next to transit stations
- Improve connectivity of walking, cycling, and rolling to transit stations
- Ensure that people of all income levels have access to development that offers a mix of destinations and services
- Ensure affordable housing options are near transit stations for people of all income levels

The City supports TOD along the City Line through the Spokane Downtown Plan, as well as the South Logan TOD project. A future bus rapid transit line is planned along Division Street. An ongoing initiative is the Division Street TOD Project, which is a grant-funded pilot program. The City of Spokane, Spokane County, and the Spokane Transit Authority (STA) are working together on the pilot program. It builds on the DivisionConnects study by the Spokane Regional Transportation Council (SRTC) and STA, aligning land use, zoning, and infrastructure with the new transit investments.

Alternative 1 continues current plans and initiatives for TOD. Alternatives 2 and 3 in this EIS consider the effect of increased transit-oriented development near bus rapid transit infrastructure based on recent legislation. Under HB 1491(2025), a city may not enact or enforce any development regulation within a station area that would prohibit the siting of multi-unit residential housing on lots where any other residential use is permissible. At this time the only BRT line that meets this criteria is the City Line (STA Route 1). In the future, other areas of the city may fall under this bill. The bill requires a minimum floor area ratio (FAR) of residential and mixed-use development in a station area except for areas with shorelines or critical areas or where there is a designated landmark or historic district. The requirement is 2.5 FAR within one-quarter mile of a bus rapid transit stop, or 3.0 FAR if exempting up to 25% of bus station areas. Additional FAR must be provided for housing made of mass timber. A minimum 10% of units must be affordable for at least 50 years and any buildings providing all affordable units are allowed another 1.5 FAR. An extension to delay implementation is allowed for up to five years if the areas are at high risk for displacement, as certified by the Washington Department of Commerce. The requirements must be met during the City's Periodic Update.

2.2.2 Comprehensive and Subarea Planning

The action alternatives address recent and ongoing subarea planning efforts and transportation investments. See **Exhibit 2.2-1**.

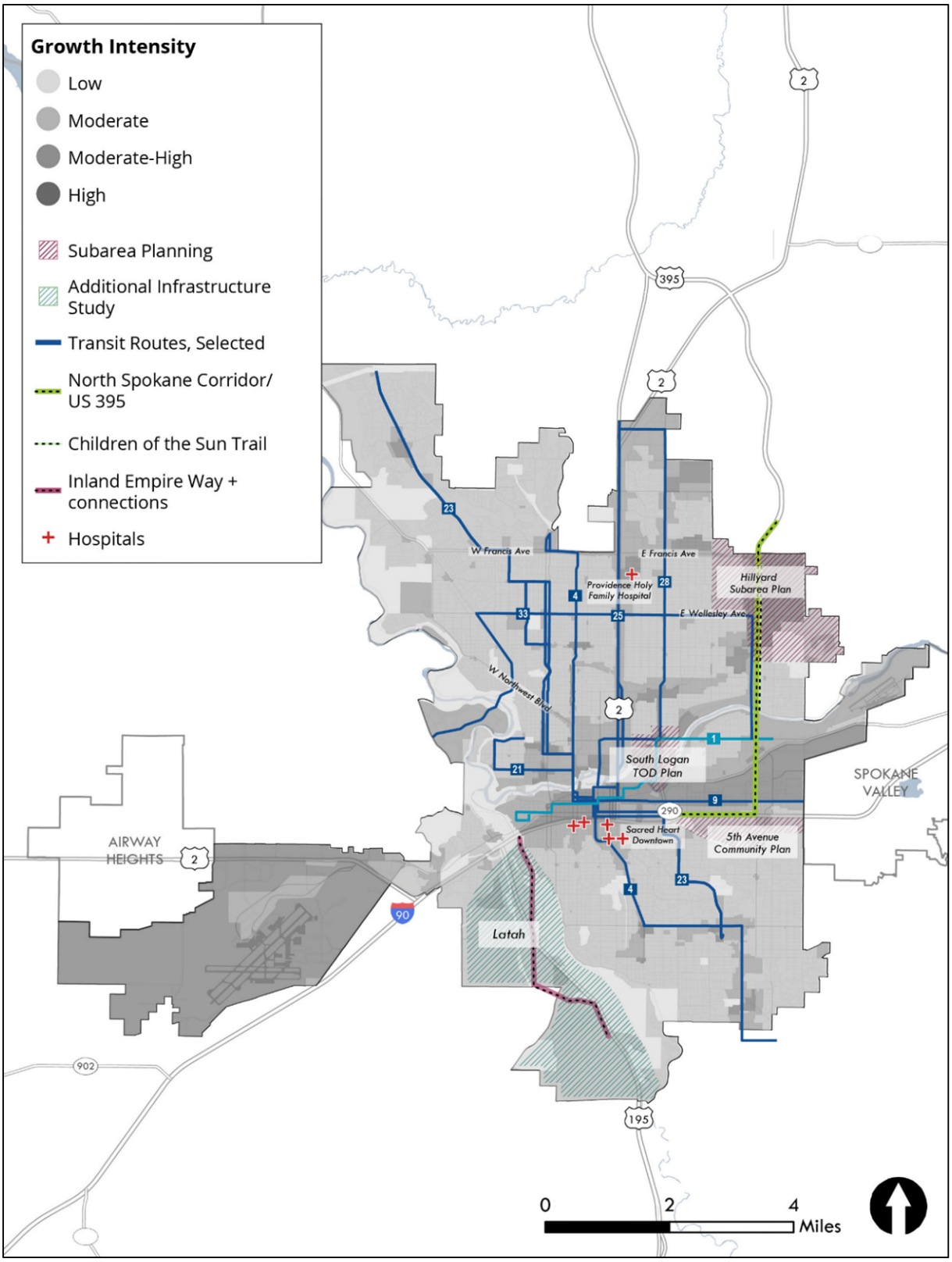
Center City, in the University District, South Logan TOD Plan: The South Logan Transit Oriented Development (TOD) Plan and Final Environmental Impact Statement (EIS) were adopted on January 29, 2023, with land use and zoning amendments and development regulation updates consistent with the Plan adopted later that year. Since the plan was approved it is part of the current Comprehensive Plan, and the growth associated with this plan is considered part of the Alternative 1 land capacity. However, this growth is not included in the SRTC land use and transportation models that have a base year of 2022. The plan and the growth associated with it are part of the action alternatives.

Northeast Spokane, Hillyard Subarea Plan: Addressing areas north of East Wellesley Avenue and along the North Spokane Corridor (NSC), the Hillyard Subarea Plan provides revitalization and funding strategies to address the prolonged housing needs and infrastructure deficiencies, improve the quality of life, increase economic opportunity, and place brownfields and other underutilized properties back into productive use. The Subarea Plan was recognized by resolution in Fall 2025.

South Spokane, East Central, 5th Avenue Community Plan: The 5th Avenue community is the historic center and cultural hub of the Black community in Spokane and is also home to a growing diversity of residents, including Latino and recent immigrant communities. The southern extent of the North Spokane Corridor (NSC) will be built through this neighborhood. The 5th Avenue Community Plan will establish a community-led framework of goals and policies for future land use, economic growth, connectivity, and quality of life improvements for the 5th Avenue community in the East Central neighborhood. The community plan builds on the foundation and vision established in the 5th Avenue Initiative Community Strategy, adopted in 2021 as the culmination of a multi-year process of community engagement and work by community leaders, residents, businesses, and organizations. The initiative fosters neighborhood identity and enhances quality of life for residents and businesses along the 5th Avenue corridor. The community plan is ongoing as of 2025.

South Spokane, Latah Strategy: The City is funding a study of Latah Valley's traffic and growth to identify transportation and other infrastructure to invest in. Latah Valley/Grandview Thorpe neighborhoods are experiencing a high volume of preliminary plats that focus vested residential growth in this area, resulting in near-term infrastructure investment needs. This study is ongoing and part of the PlanSpokane 2046 Periodic Update.

Exhibit 2.2-1. Recent and Ongoing Subarea Planning and Transportation Investments



Sources: City of Spokane, BERK, 2025.

2.2.3 Growth Targets and Alternatives

Housing Element Requirements

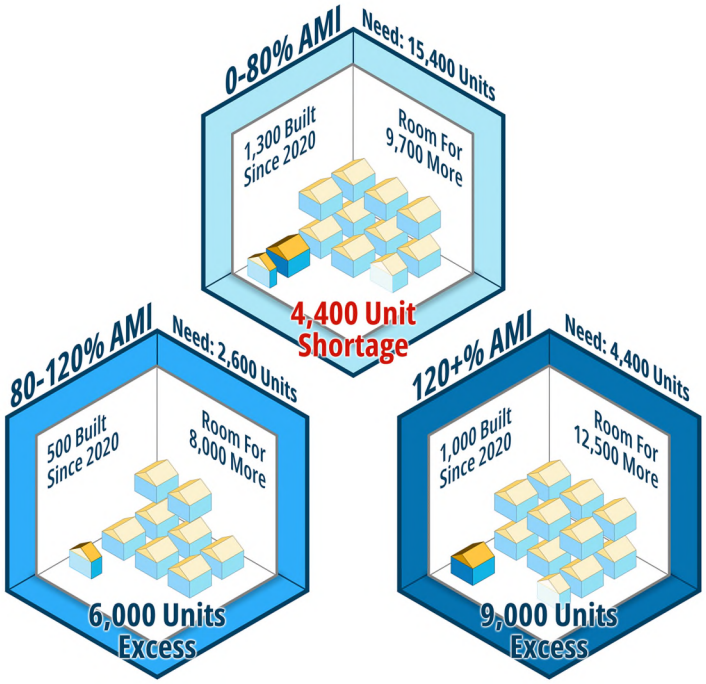
The GMA was amended to strengthen planning for housing that meets the needs of all households, provides a variety of housing types, and removes barriers to adequate housing, particularly by undoing racially disparate impacts caused by past plans or codes. Key components of a Housing Element include:

- Evaluation of Land Capacity to Meet Housing Targets
- Identifying Racially Disparate Impacts and Measures to Undo Impacts
- Evaluating Displacement Risk and Adding Anti-Displacement Measures
- Making Adequate Provisions for Housing Needs and Removal of Barriers

Land Capacity and Housing Targets

The EIS alternatives are evaluated for their ability to achieve housing growth targets that are a foundation for the Comprehensive Plan Land Use and Housing Elements. Housing targets were set considering GMA requirements and through a consultation process between Spokane County and cities. That process established that the City of Spokane should plan for 22,359 dwelling units between 2020 and 2046. The City will need to provide capacity to achieve housing allocations at all income levels in its Periodic Update. See **Exhibit 2.2-2**.

Exhibit 2.2-2. Housing Target and Affordable Housing Capacity 2020-2046



Source: City of Spokane, 2024.

The housing targets by income band are based on a 2020 base year.[1] By categorizing the units built since 2020 by income band, the City can understand how many additional housing units are needed. For the purposes of the EIS, a base year of 2022 was established to match the SRTC base year of 2022. The net growth examined in this EIS is 21,738 for the years 2022-2046. See **Exhibit 2.2-3**.

Exhibit 2.2-3. City of Spokane Housing Unit Capacity by Affordability – Alternative 1 Stay the Course

Affordability Analysis	0-80% AMI	80-120% AMI	120+% AMI	Total
LCA capacity*	9,654	8,036	12,475	30,165
Need (HAPT) 2020-2046**	15,347	2,588	4,424	22,359
2021-2022 Completes***	216	116	290	621
2021-2024 completes***	1,328	507	978	2,813
Remaining target during EIS evaluation period 2022-2046	*-5,477*	*5,564*	*8,341*	21,738
Remaining affordable target need 2025-2046	*-4,365*	*5,955*	*9,029*	19,546

Notes: * LCA – Land Capacity Analysis **HAPT – Housing for All Planning Tool |
*** Completes are based on the data available in the City of Spokane's June 2025 Report, Accommodating Affordable Housing. (City of Spokane, June 2025) As data is improved and evaluated, there may have been more housing completions than reported which show progress in meeting the City's housing target.
Sources: SRTC, 2024;, (City of Spokane, June 2025); BERK 2025.

Middle housing types like townhomes, duplexes, and courtyard apartments, as well as accessory dwelling units, are allowed in all zones that allow residential uses, including in the existing Residential Low land use designation and R1/R2 implementing zones. These smaller housing types often support households with incomes at 80-120% AMI incomes, defined as $72,601 to $90,720 annually as of 2025. Typically, multi-unit housing at low-rise (up to three stories) and mid-rise scales (up to six stories) provide housing units affordable to households with incomes at 0-80% of AMI (up to $72,600 income annually as of 2025). Low-rise and mid-rise multi-unit dwellings are at higher densities than middle housing densities. The action alternatives include areas of Moderate Density Housing and High Density Housing, as well as Mixed-Uses that can provide low- and mid-rise housing at higher densities, to a greater extent than Alternative 1. See dwelling types in **Exhibit 2.2-4**.

[1] 2020 is the target base year to align with the decennial US Census.

Exhibit 2.2-4. Residential Typologies

Single Family with ADU

Six Plex (S Grand Blvd.)

Lowrise Apt (605 S Grand)

Box Car, Univ. District

Low Density Housing	Moderate Density Housing	High Density Housing

Sources: City of Spokane, BERK, 2025.

Racially Disparate Impacts and Potential for Displacement

The City has conducted an evaluation of whether there are disparities across racial and ethnic groups in their access to housing per GMA (RCW 36.70A.070(2)).This involves identifying local policies and regulations that result in racially disparate impacts, displacement, displacement risk, and exclusion in housing, including: (i) Zoning that may have a discriminatory effect; (ii) Disinvestment; and (iii) Infrastructure availability. The City published a report in September 2025 that found:

- There is a persistent gap in homeownership rates for Black, Indigenous, and People of Color (BIPOC) households compared to White households.
- Exclusionary zoning enacted by the City of Spokane reinforced the impacts of redlining and racially restrictive covenants, wherein redlined areas historically had a lower percentage of single unit zoning in residential areas which had a segregating effect on BIPOC households and lower income households.
- Neighborhood access, income disparities, and housing affordability vary by race, putting homeownership farther out of reach for BIPOC households, who have limited access to neighborhoods and higher performing schools.
- Environmental health disparities reflect systemic disparities of historic disinvestment, exasperating disparate outcomes for overburdened communities, including higher levels of exposure to environmental hazards and lower life expectancy.
- Patterns of historic segregation are reflected in the present-day concentration of BIPOC households and uneven distribution of racial groups among neighborhoods within Spokane.
- Access to employment areas varies, with areas closer to downtown having better access to jobs, suggesting there is not an exclusion to jobs proximity.
- While Spokane has grown consistently over the last decade, the growth has not been spread equally across the city, with both areas of increasing integration and areas experiencing displacement.

- In Spokane, households at both ends of the income spectrum have fewer rental units available for their income level.
- Housing patterns and policies concentrate multi-family subsidized housing primarily into Central Spokane and Northeast Spokane, which limits access and choice for low-income households, excluding them from large parts of the city.
- Higher displacement risk exists in Central (Center City) and Northeast Spokane, areas that have higher proportions of BIPOC and lower income households, with higher eviction and demolition rates and changing market factors for redevelopment. (City of Spokane, 2025)

The report finds that the City has made recent progress through land use and code changes that begin to undo the impacts of racially disparate impacts from historic policies and practices that continue to impact residents' ability to access housing and opportunities today. The report outlines additional work to implement changes for a continued and strengthened focus on housing equity and accessibility over the next 20 years. This includes a menu of potential anti-displacement measures such as housing preservation, density incentives, small developer technical assistance, tax increment financing, and others.

Each alternative is evaluated in **Section 3.5 Population, Employment, and Housing** for how well they provide policies or changes to the Land Use Plan and zoning in order to provide housing that meets the needs of all incomes, address equity and disparate impacts, and incorporate anti-displacement measures.

Adequate Provisions for Needs and Removal of Barriers

With the development of its evaluation of land capacity, affordable housing targets, and racially disparate impacts, the City is considering changes to its development regulations to remove barriers to the provision of housing at all income levels particularly housing at 0-80% AMI income levels. This will be further developed with the Preferred Alternative in the Final EIS when more specific locations for Land Use Plan Map and zoning changes and when the City develops its companion required updates to the zoning or development code

Population, Household Sizes, and Housing Types

Population Targets

The adopted population growth target for the City between 2023 and 2046 is 23,357 additional people, a growth rate of 0.4% per year. (Steering Committee of Elected Officials, 2024) If adjusted to match the base year of the SRTC model (2022) used for the purposes of this EIS, the net population change for 2022-2046 is 25,157. When considering the most recent Washington State Office of Financial Management (OFM) 2025 population estimate, which estimates the growth the City has seen since 2022, the remaining population growth for 2025-2046 is 21,357.

The population target assumes a rate of growth substantially slower than the city has experienced in recent years (0.9% annually between 2015-2025). The population target is also lower than could be

accommodated by the number of new housing units allocated by the county. Therefore, for a more conservative analysis of public service needs, **this EIS considers a population growth range of 25,157 to 50,650** based on the exact population growth target at the low end (2022-46) and multiplying the current household size of 2.33 by the 21,738 housing target (2022-46) at the upper end.

Household Sizes and Types

Approximately two thirds of Spokane's occupied housing stock is single unit and one third is multi-unit. The existing multi-unit housing is typically 5+ housing units or greater per building, and less frequently duplexes, triplexes, and fourplexes. Middle housing types like duplexes, multi-plexes, and townhomes are part of "multi-unit" based on the total number of units. Household sizes vary by dwelling type, with higher persons per household in single unit detached dwellings and lower persons per household in attached single-unit and multi-unit dwellings. See **Exhibit 2.2-5**.

Exhibit 2.2-5. Persons per Household

Unit Type	Housing Units (2022)	Persons Per Household (2022)
Occupied Housing Units, All Types	95,604	2.33
Occupied Frame Housing*	94,053	2.34
Single Family (Single Unit) Detached	62,651 (67%)	2.64
Multifamily (Multi-unit) **	31,402 (33%)	1.74
Duplex	4,109 (4% of multi-unit)	2.30
Triplex and Fourplex	4,200 (4% of multi-unit)	2.01
Five+ Unit	23,093 (25% of multi-unit)	1.59

* Structures built on-site of wood/brick construction or modular homes.
** Single family-attached structures such as row homes, townhouses and condominiums are categorized as multi-unit structures based on the total number of units.
Source: OFM 2024 (OFM, Undated)

Under all alternatives, a majority of the housing will remain in single unit homes, but all alternatives help implement a greater variety of housing options. The City adopted a Housing Action Plan (2021) and implemented middle housing standards in 2023 and 2024 as part of the Building Opportunity for Housing program. This effort included provisions for accessory dwelling units, duplexes, triplexes, fourplexes, and townhomes in Residential Low and Residential Increased Land Use Plan Map designations allowing 4-10 and 10-20 units per acre respectively.

Taking this past action further, the action alternatives promote strategies to meet HB 1220 requirements to provide more housing types at all affordability levels and to reduce racially disparate impacts. The alternatives include providing more areas of Moderate Density Housing and High Density Housing, as well as Mixed-Use/Commercial development in the city to promote low-rise and mid-rise housing that can meet gaps in capacity for housing types that meet 0-80% AMI. Moderate Density Housing and High Density Housing would have typical densities of 30-45 units per acre.

Recognizing the action alternatives would allow for more housing capacity along frequent transit routes and major employment centers like Downtown and Hillyard, it is assumed that more multi-unit housing at low- and mid-rise levels or greater would occur. See **Exhibit 2.2-6**. Action alternatives allow more intense residential development along frequent transit routes, and mixed-uses in corridors and in neighborhoods comprising parts of Downtown. Adding the units in these locations, over 5,400 attached multi-units could be expected. This would close the gap in the affordable housing targets identified in **Exhibit 2.2-3**.

Exhibit 2.2-6. Single Unit and Multi-Unit Housing Shares by Alternative

Spokane Regional Transportation Council Transportation Analysis Zone Estimates Approximated to City Limits

	NET	TOTAL	PERCENTAGE
Existing Single Unit (2022)	-	65,989*	0.65
Existing Multi Unit (2022)	-	35,786*	0.35
Alternative 1 Single Unit	11,942	77,931	0.63
Alternative 1 Multi Unit	9,796	45,581	0.37
Alternative 2 Single Unit	6,456	72,445	0.59
Alternative 2 Multi Unit	15,282	51,068	0.41
Alternative 3 Single Unit	6,450	72,439	0.59
Alternative 3 Multi Unit	15,288	51,074	0.41

*The OFM estimates that are more precise to the city limits total 101,222 units whereas the SRTC model with transportation analysis zones (TAZs) approximated to the city limits total 101,775 units. OFM estimates 65,876 single units, 33,713 2+ housing units, and 1,633 mobile homes and special units (e.g., RVs, motel/hotel units permanently occupied) in the city limits.
Sources: SRTC, 2024 Transportation Analysis Zones matched to city limits; BERK, 2025.

Jobs

The City of Spokane has about 128,000 jobs as of 2022 according to the US Census Bureau, Census on the Map, growing from 112,000 in 2002. The greatest growth between 2002 and 2022 was in healthcare with almost 11,500 new jobs. The current mix of jobs shows the highest share in healthcare, services, retail, and leisure and hospitality.

GMA does not require the allocation of employment targets but cities and counties planning under GMA must plan for employment uses. Spokane County and the cities within it do not formally allocate job targets. The City's EIS Alternatives can evaluate a range of potential job growth to help the City consider its role as a regional job center, the balance of housing and jobs for its community, and

ensuring the City plans appropriately for infrastructure (avoiding over-investment or under-investment).

Based on several employment projections, the City could anticipate nearly 21,000 to 42,000 new jobs by 2046. To test the phasing of infrastructure needs based on different job numbers, the alternatives evaluate projections of 25,000 to 39,000 jobs, around a mid-range projection by the Spokane Regional Transportation Council (SRTC).

All alternatives assume greater jobs than the 20-year trend, which would add nearly 21,000 jobs between 2022-2046. See **Exhibit 2.2-7**. Alternative 1 studies the SRTC projections which would add almost 35,000 jobs, about 14,000 more jobs than the 20-year trend. Alternatives 2 and 3 bookend this Alternative 1 protection. Alternative 2 studies growth like ESD projections that adds almost 25,000 jobs in the planning period. Alternative 3 studies a moderately higher projection above Alternative 1 of nearly 39,000 jobs.

Exhibit 2.2-7. Employment Projections

	20-Year Historical Rate*	Alternative 2 (State ESD)**	Alternative 1 (SRTC)***	Alternative 3 (Moderate-High)
Absolute Change, 2022-46	20,659	24,939	34,850	38,848
Avg Annual	898	1,084	1,515	1,689

Notes: *compound annual growth rate (CAGR) | **Employment Security Department (ESD) | *** Spokane Regional Transportation Council (SRTC) -using the SRTC model aligning transportation analysis zones (TAZs) with city limits, the jobs assumption is 35,284.
Source: BERK, 2025.

20-Year Historical CAGR. Forecasts employment growth based on historical patterns by applying the observed 20-year compound annual growth rate of 0.65% from 2022 to 2046.

Adjusted Employment Security Department (ESD) County Projection. Forecasts employment growth based on the forecasted county employment growth as reported by ESD and the share of countywide growth that has occurred in Spokane in the past ten years (2012-2022).

Spokane Regional Transportation Council (SRTC) Projections. Applies the employment growth rate of 1.05% generated by SRTC for the City of Spokane.

Moderate-High Projection. Considers a growth rate above the SRTC Projection of 1.15%.

These projections provide total job numbers. It is anticipated the City's job mix and growth in the future would be similar to today's mix with continued growth in health care, services, accommodation, and others. (Workforce Council, 2025) See **Section 3.5 Population, Employment, and Housing**.

All alternatives allow a range of commercial uses. Action alternatives provide more opportunities for neighborhood-serving commercial uses that meet new policies and criteria, and additional areas of mixed-uses. See **Exhibit 2.2-8**. All alternatives promote the highest employment in Downtown as well as Hillyard and around the airport in West Hills. In the southwest and northeast, the employment is

primarily light or heavy industrial, while Downtown employment includes offices, research and development, medical, and education. See **Exhibit 2.2-9**.

Exhibit 2.2-8. Commercial Typologies

Corner Cafe (Maple Street)	Shopping Center	Nonna Mixed Use	River Park Square
Neighborhood Commercial	**Commercial**	**Mixed Use**	**Downtown**

Exhibit 2.2-9. Industrial and Employment Typologies

West Plains Area	Spokane Med. District	Trent Avenue	860 E Spokane Falls
Light Industrial	**Employment Light**	**Heavy Industrial**	**Employment Heavy**

2.2.4 PlanSpokane Policies and Regulation Proposals

The Comprehensive Plan includes goals and policies that then are implemented by programs and regulations. The City has developed draft chapters of the Comprehensive Plan, adjusting the text and policies to meet new requirements, remove outdated material, and streamline the plan.

The City is also developing regulations to meet state requirements and to simplify, clarify, and modernize the City's code:

- Modernize City's Development Regulations. Conduct a review of existing land use and development regulations in the Spokane Municipal Code (SMC) to identify outdated provisions, legal deficiencies, inconsistencies, and gaps relative to state law and adopted plans.
- Remove Barriers to Development. Identify barriers to development including but not limited to housing production, infill development, and adaptive reuse.

- Improve Clarity and Usability. Develop a clear, user-friendly, enforceable unified development code and GIS-based zoning map that support Comprehensive Plan goals related to housing, equity, sustainability, economic vitality, and community character.
- Streamline Permitting and Service Delivery. Propose strategies to simplify and expedite development review and permitting processes while ensuring predictable outcomes and consistent application.
- Engage Stakeholders and the Public. Facilitate inclusive engagement with staff, elected officials, stakeholders, and the public to build shared understanding and ownership of the code modernization process and its outcomes.
- Support Implementation and Ongoing Improvement. Provide tools, training, visual aids, and documentation to support implementation, improve transparency, and ensure long-term adaptability through integration with planning, permitting, and technology systems.

Fulfilling these purposes will help the City to meet state requirements and the City of Spokane Comprehensive Plan vision and policies.

Examples of initiatives that support the code update purposes include:

- Land Use Implementation/changes to zoning categories: The City is considering reducing the number of land use categories in the Comprehensive Plan land use map and allowing implementing zoning to provide the detail of types of uses and densities.
- Housing code changes to meet state law: This includes reviewing and amending land use and housing regulations to provide housing types that meet all income levels such as sufficient capacity in moderate and high-density housing.
- Mixed Use Zone recommendations including adjustments to centers and corridors: Based on the Spokane Centers and Corridors Study in 2024, changes could include developing mixed-use zones that support the City's goals for amenity-rich, walkable, mixed-use center.
- Critical Areas Ordinance: The City is also reviewing critical areas regulations to address state rule updates and ensure ongoing protection of the functions and values of wetlands, fish and wildlife habitat, and critical aquifer recharge areas as well as to protect public health and safety in frequently flooded areas and geologically hazardous areas.

Many of these Comprehensive Plan policy or code update concepts have been the subject of community engagement, including in fall 2025. See **Chapter 5 Appendix A**.

Chapter 3 of this Draft EIS identifies how draft policies and code proposals associated with the action alternatives help serve as mitigation measures ("incorporated plan features") that reduce potential environmental impacts.

2.3 Public Outreach

2.3.1 Visioning and Scoping Period

WAC 197-11-210 et seq. authorizes municipalities planning under GMA to integrate the requirements of SEPA and GMA so that environmental analysis under SEPA occurs concurrently with, and as an integral part of, the planning and decision-making process under GMA. Both SEPA and GMA recognize public participation and governmental agency coordination as critical to the planning process. The City conducted an integrated visioning and scoping process from February 5, 2025 through April 7, 2025. A written comment period and several workshops and surveys were conducted and are described below.

Scoping: Community Engagement

Both before and during the scoping comment period, the City of Spokane Department of Planning and Economic Development provided opportunities for the community to be engaged in the process of identifying the future vision for Spokane's next twenty years. See **Chapter 5 Appendix A.**

- Vision Board (January 9, 2025 through April 10, 2025, online)
- Community Visioning Workshop Series
  - **District 1:** March 5, 2025, Northeast Community Center
  - **Community-wide:** March 12, 2025, Central Library
  - **District 2:** March 25, 2025, Liberty Park Library
  - **District 3:** March 27, 2025, Shadle Park Library
- Community Visioning Survey (April 1 through April 18, 2025, online)
- Spring Market Visioning (April 9, 2025)

Over 300 people participated and shared ideas about the future of Spokane and how to plan Spokane through 2046. Key themes included nature, community, innovation, and livability. These themes are part of Proposal Objectives in **Section 2.1.4 Objectives of the Proposal**.

Exhibit 2.3-1. Engagement Themes

Source: City of Spokane, 2025.

Scoping: Agency Workshop and Written Comments

In addition to the community workshops identified in the above section, the City of Spokane hosted an Agency and Tribal workshop on February 19, 2025.

Agency comments during the 60-day scoping period were received from the Spokane Tribe of Indians, Washington State Department of Transportation, Spokane Transit, Spokane Riverkeepers, and University District Development Association. Requests were made to study cultural resources, critical areas, groundwater, habitat, water conservation, transportation mitigation on state routes, transit-oriented development, and climate resilience.

Environmental elements proposed for study in the Comprehensive Plan EIS include those listed below. In addition to standard review, integration of agency comments and study of impacts are emphasized

with underlines. Each alternative is evaluated with these topics. The City considers environmental justice and climate resilience as part of studying each topic.

- Earth, water quality, and water resources
- Air quality and greenhouse gas emissions
- Plants and animals, including critical areas and habitat
- Land use patterns and urban form, including historic and cultural resources
- Relationship to plans, policies, and regulations
- Population, employment, and housing
- Transportation, including multiple modes and city and state facilities
- Public services: police, fire and emergency medical services, parks, schools, libraries, and solid waste
- Utilities: power, water, wastewater, and stormwater

Fall 2025: Future Growth and Guiding Policies Workshops

In November 2025, the City held a community workshop series on future growth and guiding policies for initial feedback on different ways the City of Spokane can grow, as well as the goals and policies to guide the growth. See **Chapter 5 Appendix A.** Over 100 individuals attended one or more of the workshops, providing valuable feedback to help shape the future of the City of Spokane. These in-person workshops included discussion, mapping exercises, and feedback opportunities related to various aspects of the Comprehensive Plan, including the new element of climate and resiliency.

In one station, community members were presented with the three growth alternatives being evaluated in this EIS as part of the PlanSpokane 2046 Periodic Update process. After reviewing the proposed maps and a snapshot of environmental impact evaluation comparisons between the three alternatives, community members were asked to identify their preferred growth strategy. In general, community members liked the interconnectedness of Alternative 2 but also saw the benefit of the Center City focus of Alternative 3 on businesses, community safety, and more housing.

Other stations addressed land use and transit-oriented development, future transportation, climate policies, environmental justice, and displacement and resulted in ideas for strategies and policies to shape the next twenty years.

2.3.2 Draft Comprehensive Plan and Draft EIS Engagement

See the Fact Sheet for ways to provide written comments during a 60-day written comment period from December 18, 2025 to February 18, 2026.

A series of public and agency workshops are planned during the Draft EIS comment period. For the latest information on the workshop topics and times, please see the project website at: my.spokanecity.org/planspokane/.

2.4 Proposed Action and Alternatives

2.4.1 Alternative Comparison

The City is studying three Alternatives in the Draft EIS described below and in more detail in following sections.

- **Alternative 1 Stay the Course:** This SEPA required Alternative (No Action Alternative) is the continuation of the current Comprehensive Plan and associated zoning and regulations. This alternative meets total housing and total population targets but does not meet affordable housing targets for all income bands. It provides for job growth that is more robust than prior trends.
- **Alternative 2 Distributed and Balanced:** Alternative 2 adds greater housing and job intensity along frequent transit routes and prioritizes a jobs/housing balance. Housing targets at all income levels would be met. To evaluate infrastructure phasing, Alternative 2 is analyzed through a job growth level similar to State Employment Security Department trends. Alternative 2 includes climate planning and supporting multimodal levels of service per HB 1181 and would update critical areas regulations.
- **Alternative 3 Center City and Regional Hubs:** Alternative 3 focuses both jobs and housing growth in regional hubs and connections between them, particularly Center City (connecting regional centers/hubs via I-90 and the North Spokane Corridor (NSC)). Alternative 3 meets housing targets at all income levels. It uses the highest jobs projection and focuses investments in key employment centers, also for the purposes of testing infrastructure needs. Alternative 3 includes climate planning and supporting multimodal levels of service per HB 1181 and would update critical areas regulations.

Each Alternative is summarized in **Exhibit 2.4-1** below and described in more detail in following sections.

Exhibit 2.4-1. Alternatives Overview

Feature	Alternative 1: Stay the Course	Alternative 2: Distributed and Balanced	Alternative 3: Center City and Regional Hubs
Plan & Code Update	Current	Periodic Update	Periodic Update
Areas of Focus for Growth	Focuses growth in Downtown and centers and corridors.	Mixed-use Transit-Oriented Development along frequent transit corridors. Allow more neighborhood-serving commercial uses. Simplified Land Use Plan.	Focus growth in Downtown and Regional Hubs and in areas with greatest investment in transit and transportation. Allow more neighborhood-serving commercial uses. Simplified Land Use Plan.
Housing Growth Target: 2022-2046	21,738 units, in addition to units already developed since 2020 New units would add about 21% new housing stock to existing dwelling units.		
Housing Mix The city's current proportion of single units is about two thirds of the housing stock (65%/35%).	New units would slightly move the proportion towards multi-unit (greater than 1 unit) (63%/37%).	New units are assumed to be 25% single unit and 75% multi-unit (middle housing and apartments). Adding new housing to existing housing, the city's total housing stock would remain majority single unit housing but add more variety (59%/41%).	
Housing Affordability Targets: 2022-2046	0-80% area median income (AMI): *Insufficient* 80-120% AMI: Sufficient 120+% AMI: Sufficient	Meets all income levels. This includes low-rise (2-3 stories) and mid-rise (5-6 stories) housing in proximity to transit and inclusion of new mixed-use zones. Meets HB 1491 requirements for transit-oriented development near bus rapid transit.	
Population Ranges: 2022-2046	25,157 to 50,650		
Job Projections 2022-2046*	34,850 net jobs Regional SRTC Projection 15,000 jobs above historic trend	24,939 net jobs State ESD Projection 5,000 jobs above historic trend	38,848 net jobs Moderate-High Projection 19,000 jobs above historic trend

* Each alternative studies a job projection from a different data source to support infrastructure planning. The different numbers are not based on an alternative's likelihood to produce more or fewer jobs.
Sources: SRTC, 2022; City of Spokane, 2025; BERK, 2025.

2.4.2 Alternative 1: No Action, Stay the Course

This SEPA-required Alternative represents continuation of the current Comprehensive Plan and associated zoning and regulations. Recently amended plans are included, such as the South Logan Transit-Oriented Development Plan.[2]

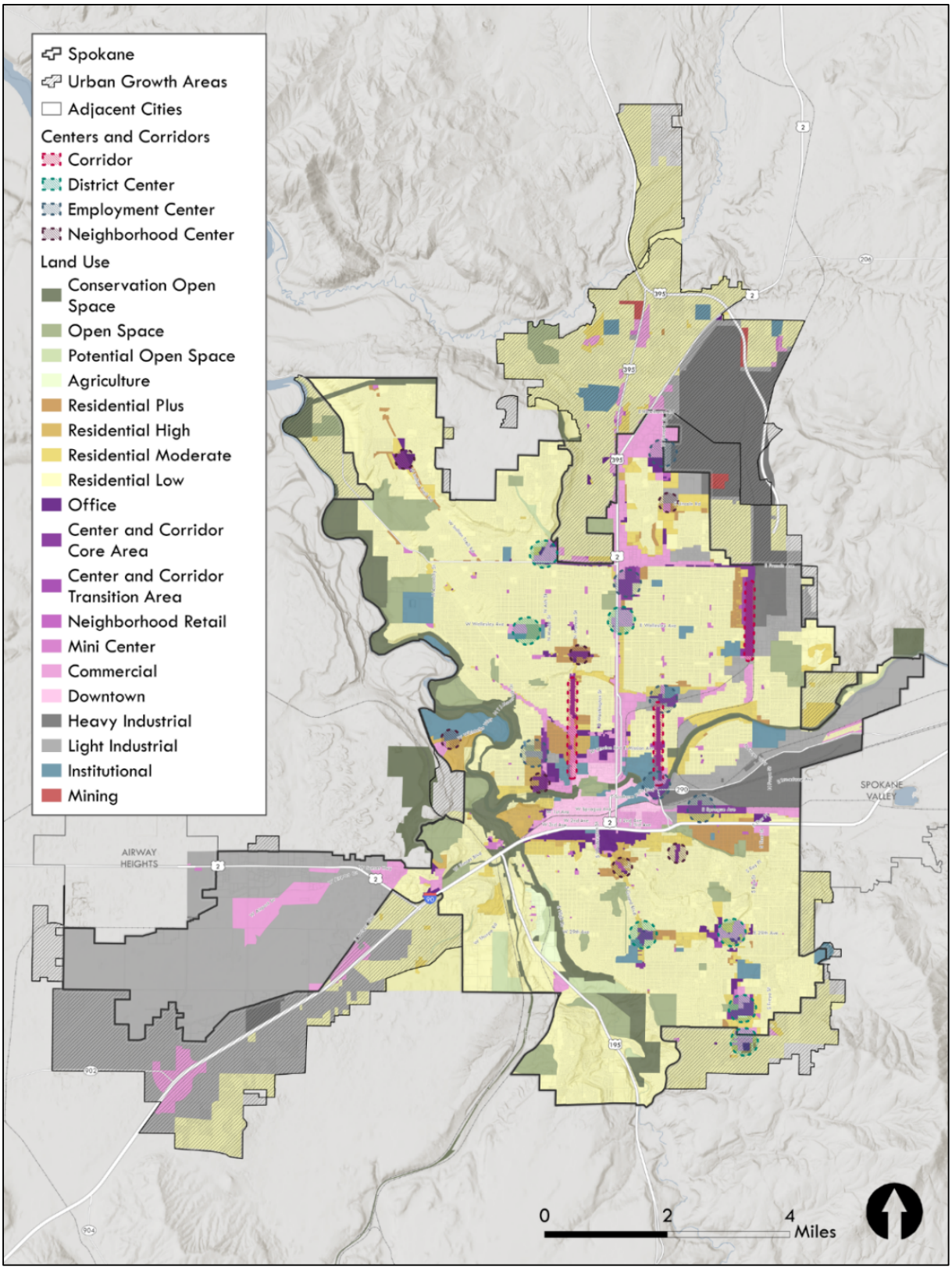
Growth would continue as planned under current rules and is focused on centers and corridors, a growth strategy originally adopted in the early 2000s. See the adopted Land Use Plan in **Exhibit 2.4-2**. Higher intensity housing is found in centers and corridors and Downtown. Middle housing and single unit dwellings are allowed in all residential areas. Employment is focused on health/services (Downtown) and industrial jobs in areas along railroads and near Spokane International Airport. A map showing relative growth intensity levels is shown in **Exhibit 2.4-3**.

Alternative 1 meets total housing growth targets but does not provide sufficient capacity for housing at all income levels, particularly those affordable at 0-80% AMI. The distribution of housing is shown in **Exhibit 2.4-4**. Job growth is consistent with regional projections by SRTC. Job growth distribution is shown in **Exhibit 2.4-5**. For the distribution by Transportation Analysis Zone, please see **Chapter 5 Appendix B.**

Alternative 1 continues current natural environment policies and critical areas regulations. It would not add a new Climate Element per HB 1181.

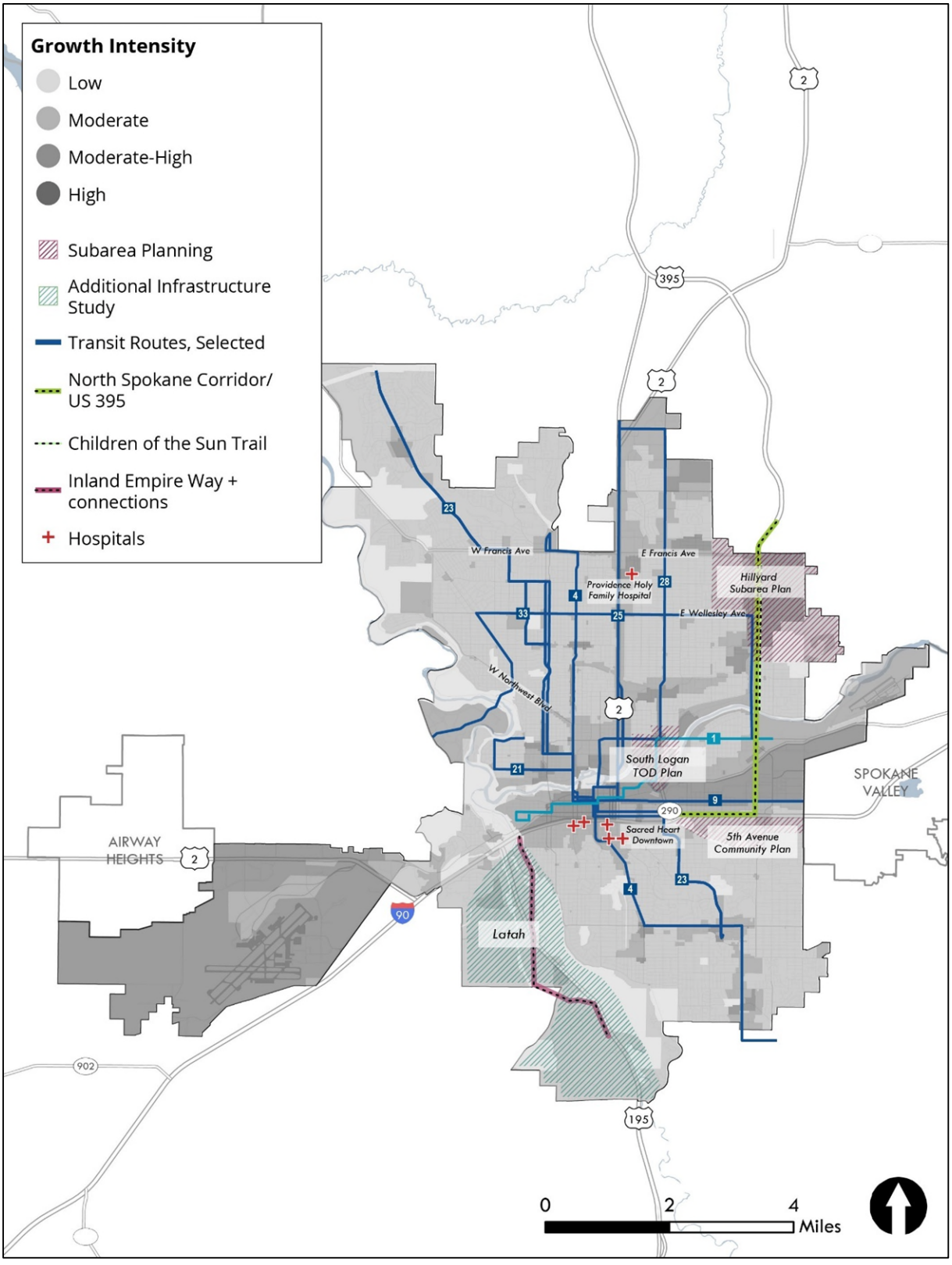
[2] The SRTC model base year is 2022 whereas the subarea plan adoption was in January 2024. Thus, the transportation assumptions for 2022 are lower than the action alternatives that implement the expected growth.

Exhibit 2.4-2. Alternative 1 Stay the Course



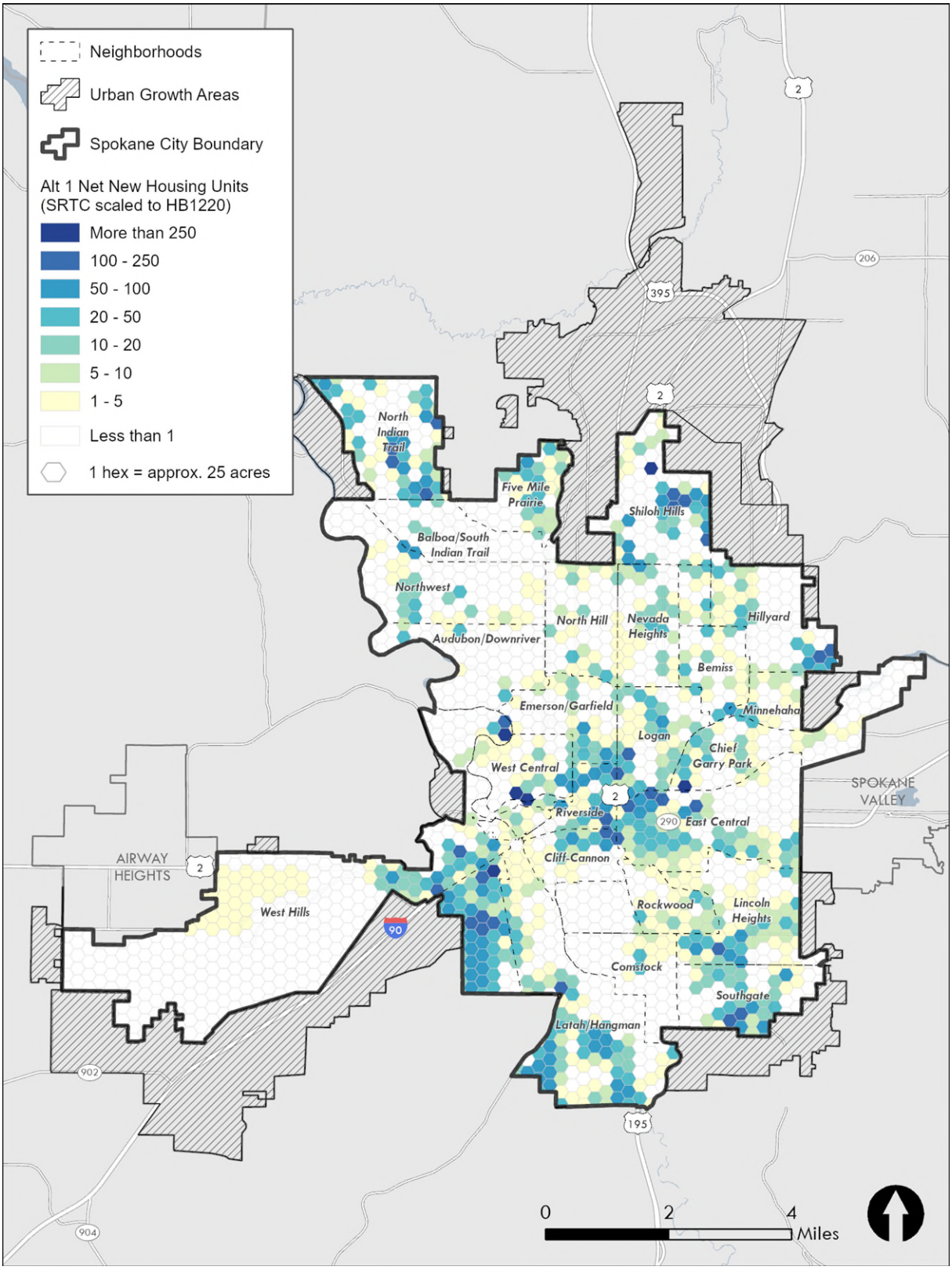
Sources: City of Spokane; BERK Consulting, 2025.

Exhibit 2.4-3. Alternative 1 – Growth Intensity



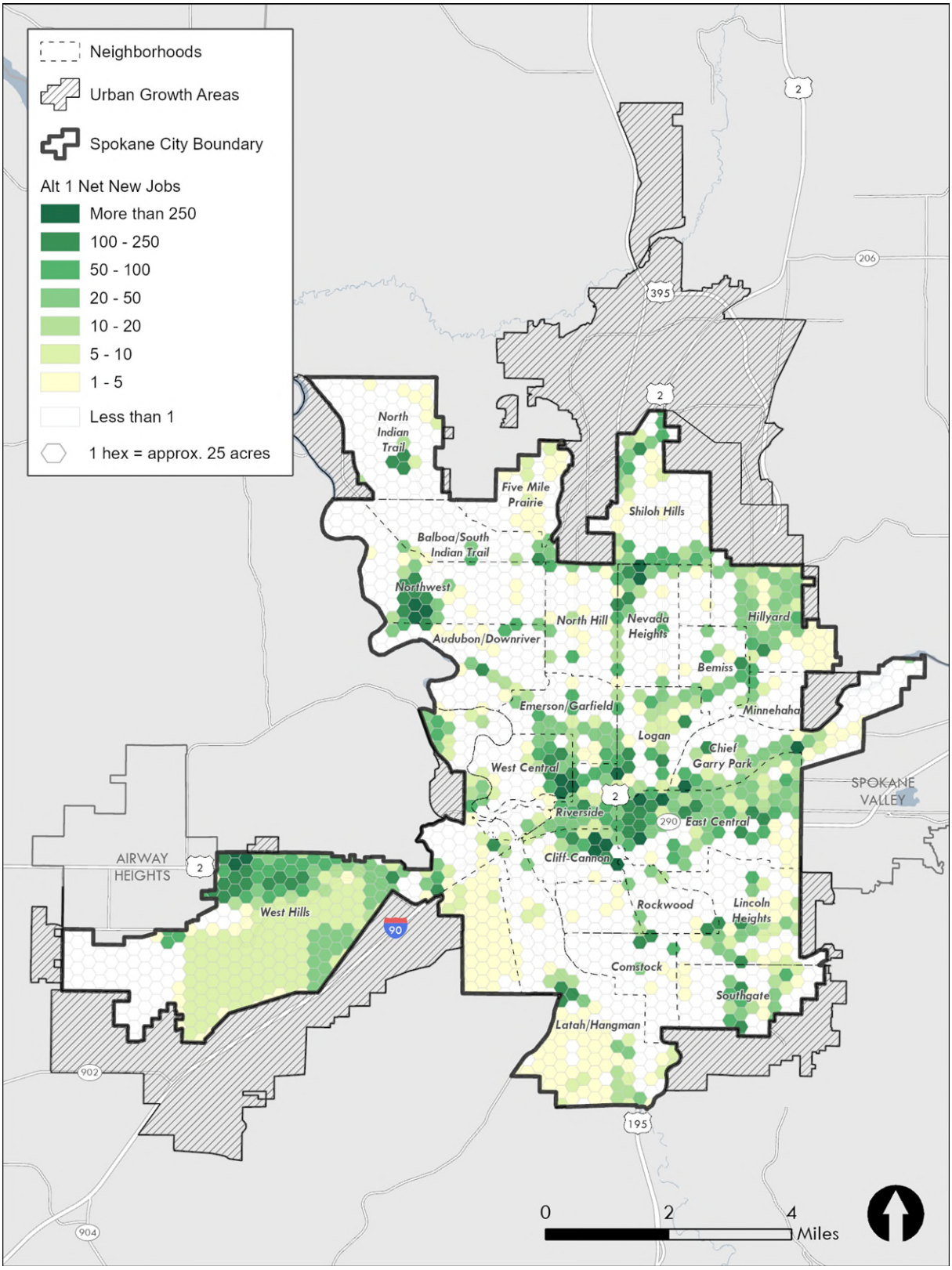
Sources: City of Spokane; BERK Consulting, 2025.

Exhibit 2.4-4. Alternative 1 Housing Growth



Sources: City of Spokane, BERK Consulting, 2025.

Exhibit 2.4-5. Alternative 1 Job Growth



Sources: City of Spokane, BERK Consulting, 2025.

2.4.3 Alternative 2: Distributed and Balanced

Alternative 2 modifies centers and corridors concepts following the recommendations of the adopted Centers and Corridors Study (City of Spokane, 2025) to better consider market conditions and zoning best practices, primarily through the application of mixed-use designations. It would intensify mixed-uses along transit in Downtown, Division Street, and other frequent transit routes, and would expand existing centers in South Spokane into corridors. It adds mixed-use zoning along arterials in Northwest and Northeast Spokane as well. See **Exhibit 2.4-6**.

As described above, Alternative 1 continues the current plan and code that advances middle housing and existing centers and corridors Alternative 2 builds on Alternative 1 and provides a greater range of housing through low- and mid-rise housing and mixed-use areas along frequent transit routes, resulting in more corridors identified for residential and mixed uses. Alternative 2 includes planned transit-oriented development (TOD) improvement areas, which align with recent state legislation (HB 1491). The distribution of housing is shown in **Exhibit 2.4-7**. Compared with Alternative 3, which focuses more so on selected corridors and in Downtown, Alternative 2 provides more higher intensity residential and mixed uses in narrower bands along more corridors.

Alternative 2 continues to support existing job centers, while providing for greater mixed-use development and commercial uses along corridors with frequent transit. Recognizing community interest in walkable areas with services, there would be new neighborhood/small scale retail nodes according to locational criteria. The job distribution under Alternative 2 is **Exhibit 2.4-8**.

The City's current jobs-housing ratio is 1.3 jobs for every 1 housing unit. Compared to Alternatives 1 and 3, Alternative 2 provides a more balanced share of housing and jobs with 21,738 housing units and 24,939 jobs, a ratio of 1.4 for net growth (the total employment and housing shares would result in a jobs/housing balance 1.2, similar to the current share per **Section 3.5**). Alternative 2 also meets housing targets at all income levels, identifies and begins to undo racially disparate impacts in housing, and establishes anti-displacement policies under HB 1220. Alternative 2 establishes a jobs allocation somewhat above the 20-year trend linked to jobs/housing balance.

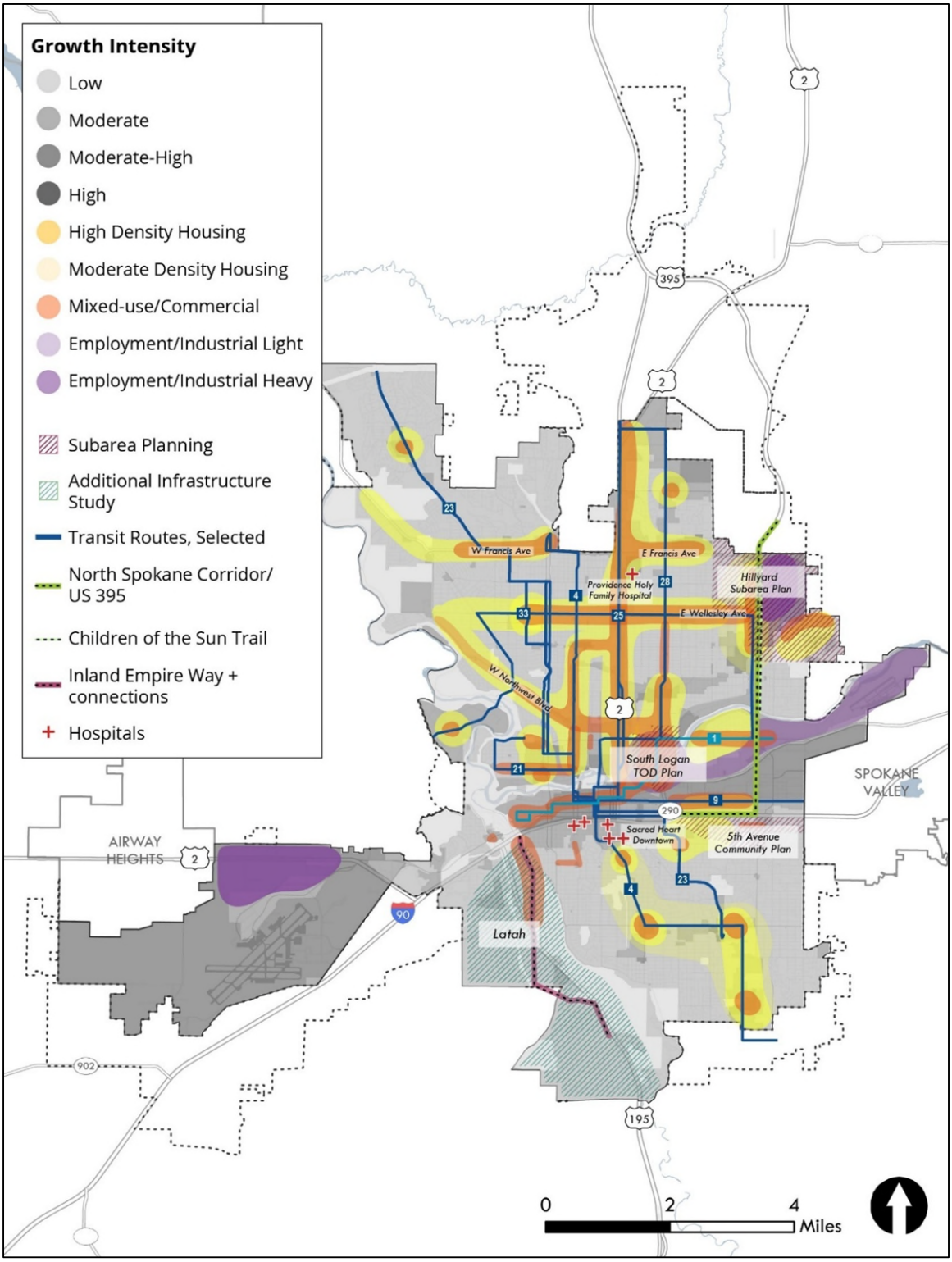
Alternative 2 simplifies the land use plan so that there are fewer land use designations, with each designation implemented by multiple zones. This provides flexibility to respond to changing community needs and market conditions and avoids unnecessary Comprehensive Plan amendments.

Alternative 2 includes anticipated climate resilience and greenhouse gas reduction goals and policies per HB 1181and updates critical areas regulations.

Alternative 2 updates multimodal levels of service (LOS) and improves accessibility for multiple modes of travel.

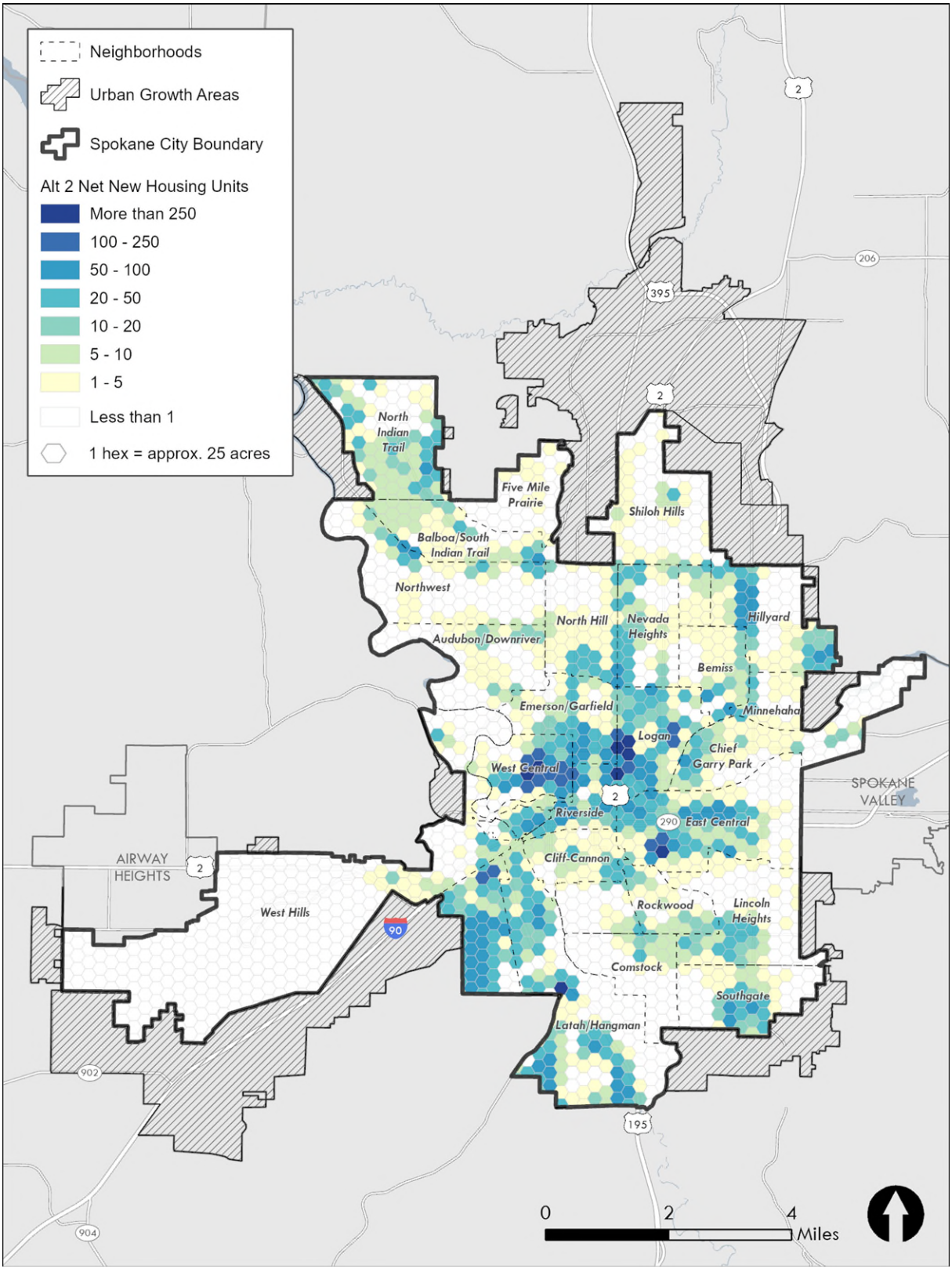
Alternative 2 would facilitate growth through infill exemptions under SEPA (RCW 43.21c.229) where the EIS provides upfront evaluation of growth along frequent transit routes, and documents plans or development regulations that provide mitigation measures. The City may also raise SEPA thresholds citywide (WAC 197-11-800).

Exhibit 2.4-6. Alternative 2 Distributed and Balanced



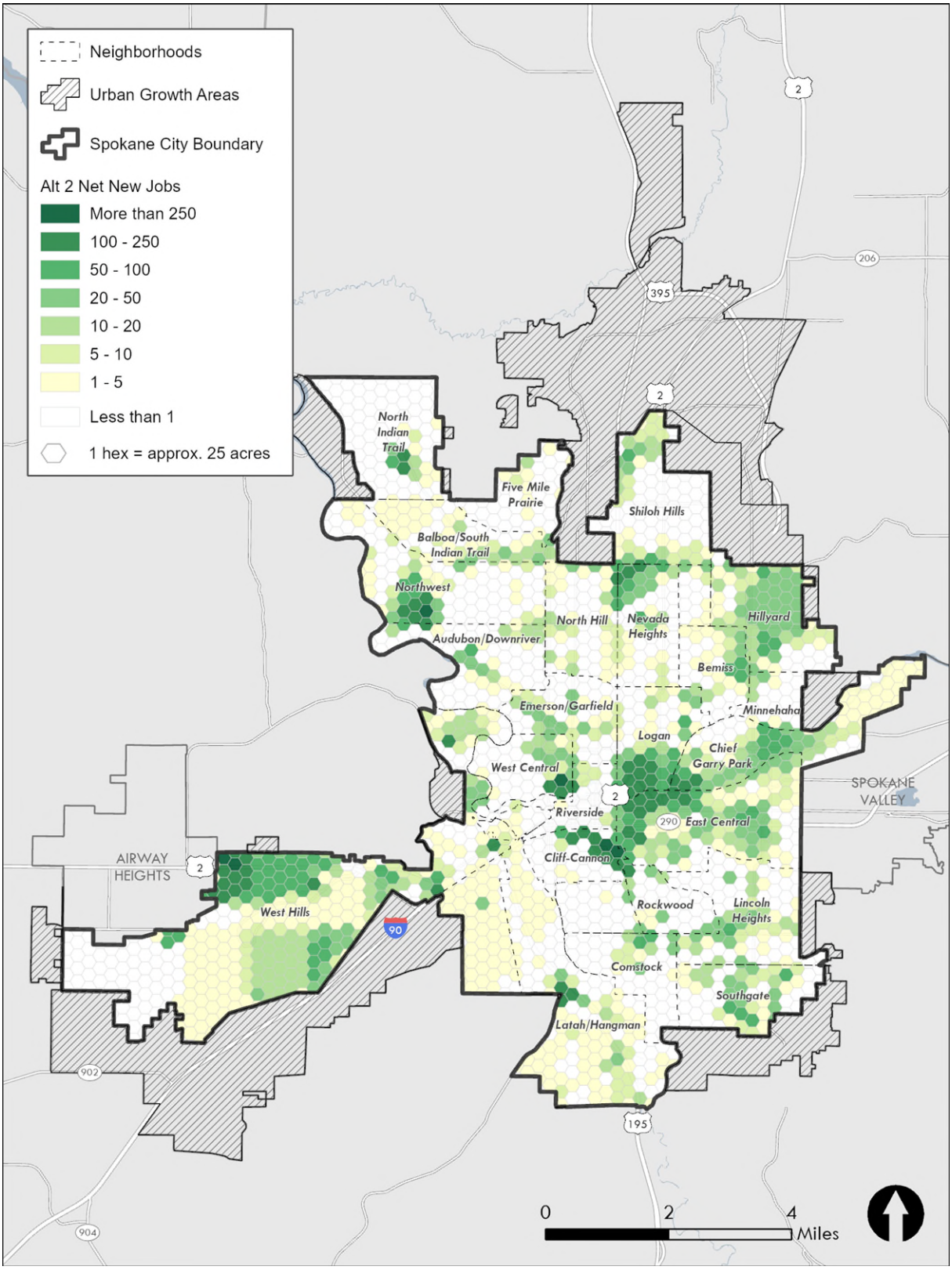
Note: There will be neighborhood-serving commercial opportunities that could locate in residential areas based on criteria that are not geographically identified on the map.
Sources: City of Spokane, BERK Consulting, 2025.

Exhibit 2.4-7. Alternative 2 Housing Growth



Sources: City of Spokane, BERK Consulting, 2025.

Exhibit 2.4-8. Alternative 2 Job Growth



Sources: City of Spokane, BERK Consulting, 2025.

2.4.4 Alternative 3: Center City and Regional Hubs

Alternative 3 focuses housing growth in major hubs, particularly in the Center City, and provides additional education/health jobs in the city center and University Area. It concentrates new industrial jobs in public development authorities in West Plains and Northeast Spokane. See **Exhibit 2.4-9**.

Alternative 3 balances regional travel priorities with neighborhood livability by identifying key transportation connections between regional centers (I-90 and the North Spokane Corridor). It improves accessibility for multiple modes of travel and new multimodal levels of service.

City investments prioritize certain centers and major corridors to maximize impact of designation. Designations in other areas are removed or modified where appropriate, while still considering livability/streetscape improvements. Mixed-use and higher density housing would be designated along these prioritized corridors. Like Alternative 2, there would be new neighborhood/small scale retail nodes according to locational criteria.

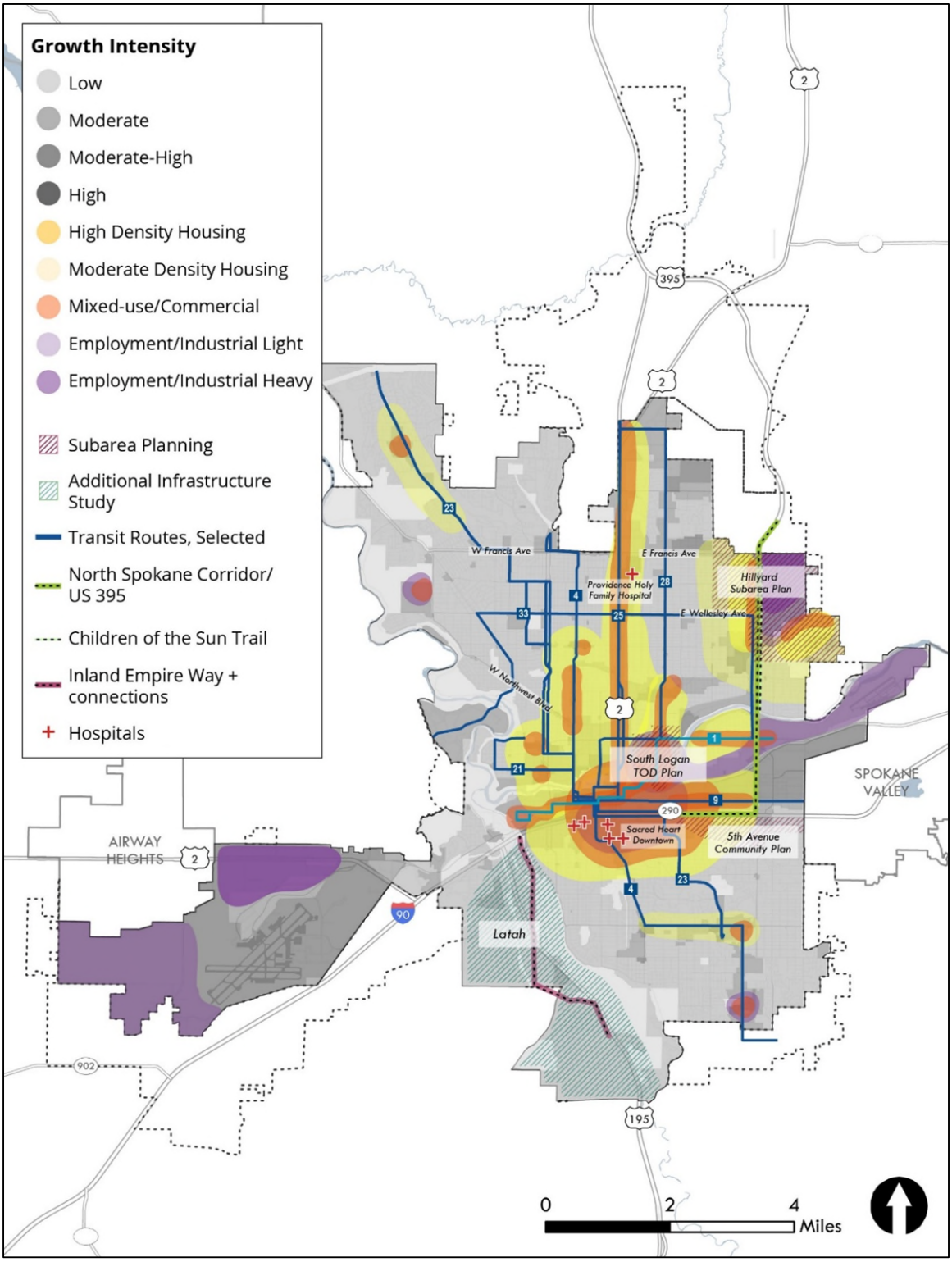
Alternative 1 continues the current plan and code with a recent emphasis on middle housing unit types. Alternative 3 meets housing targets at all income levels and provides a greater range of housing types such as low- and mid-rise housing that is a higher density than middle housing. Housing distribution is shown in **Exhibit 2.4-10**. It focuses investments in areas with transportation investments that improve connections between hubs (Downtown transit and street network, airport, rail corridors, NSC), as well as along bus rapid transit lines – thus it prioritizes certain corridors for investments whereas Alternative 2 identifies intensification along more corridors that have frequent transit. Alternative 3 also identifies and begins to undo racially disparate impacts in housing and establishes anti-displacement policies under HB 1220. Alternative 3 establishes the highest jobs allocation. See **Exhibit 2.4-11** for the jobs distribution under Alternative 3.

Like Alternative 2, Alternative 3 simplifies the land use plan so that there are fewer land use designations, which are then implemented by multiple zones.

Alternative 3 includes an infill exemption (RCW 43.21c.229) along frequent transit routes, particularly bus rapid transit, and potentially includes a planned action with upfront environmental review and mitigation measures for jobs centers, focused on light industrial and commercial /mixed-use. The City may also raise SEPA categorical exemption thresholds citywide (WAC 197-11-800).

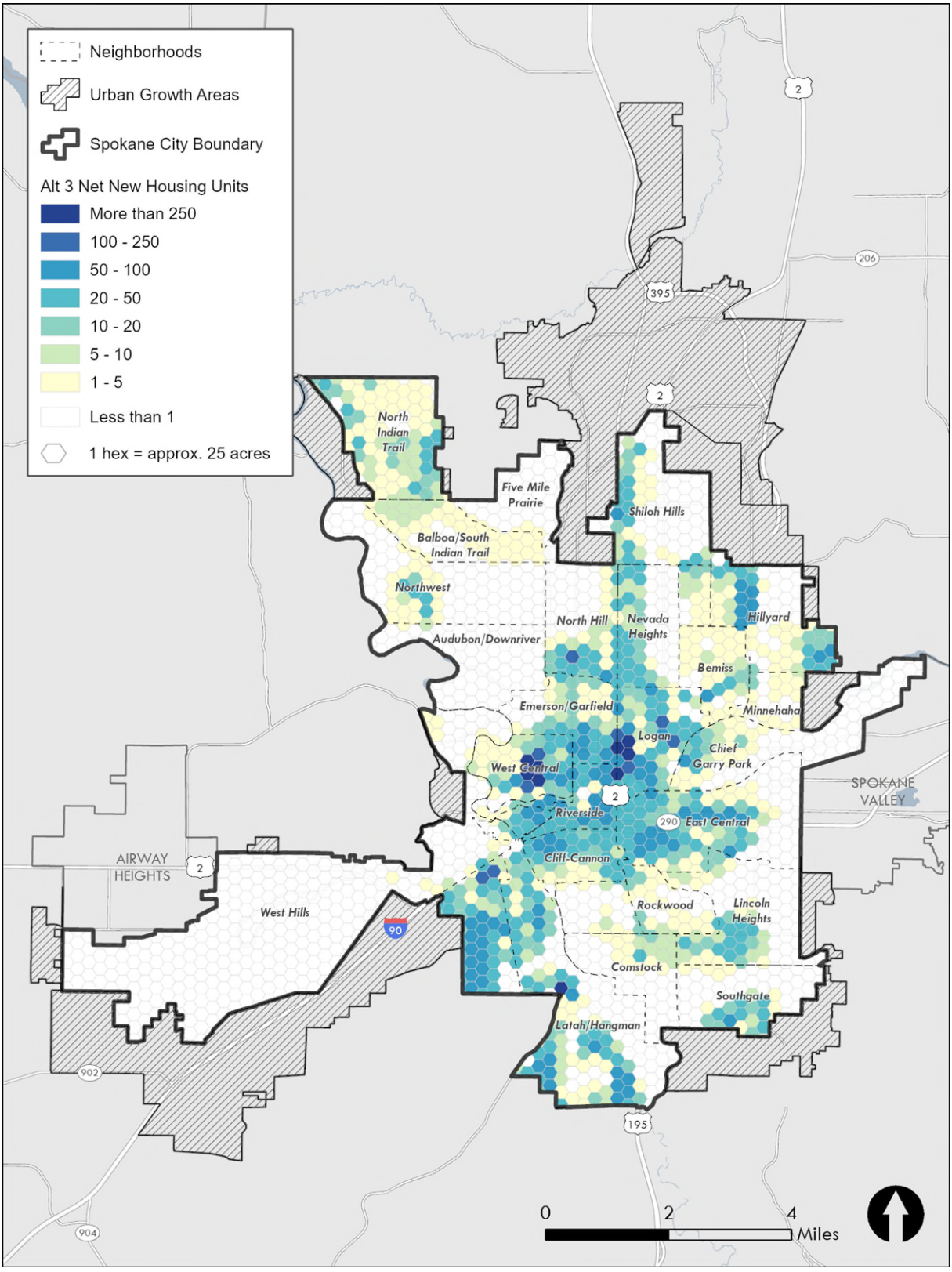
Like Alternative 2, Alternative 3 includes new climate adaptation and mitigation goals and policies per HB 1181 and updates critical areas regulations.

Exhibit 2.4-9. Alternative 3: Center City and Regional Hubs



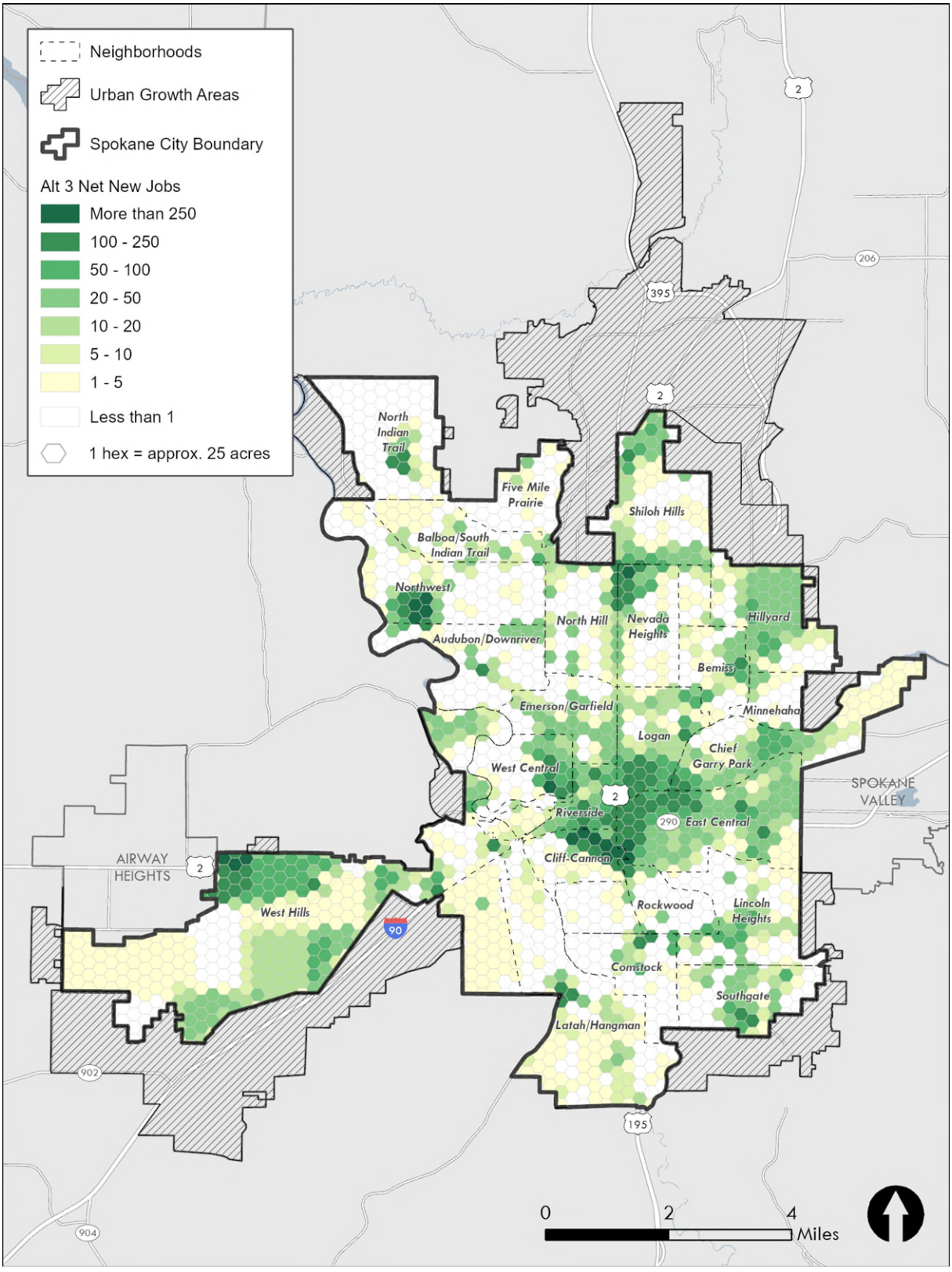
Note: There will be neighborhood-serving commercial opportunities that could locate in residential areas based on criteria that are not geographically identified on the map.
Sources: City of Spokane, BERK Consulting, 2025.

Exhibit 2.4-10. Alternative 3 Housing Growth



Sources: City of Spokane, BERK Consulting, 2025.

Exhibit 2.4-11. Alternative 3 Job Growth



Sources: City of Spokane, BERK Consulting, 2025.

2.4.5 Future Alternatives

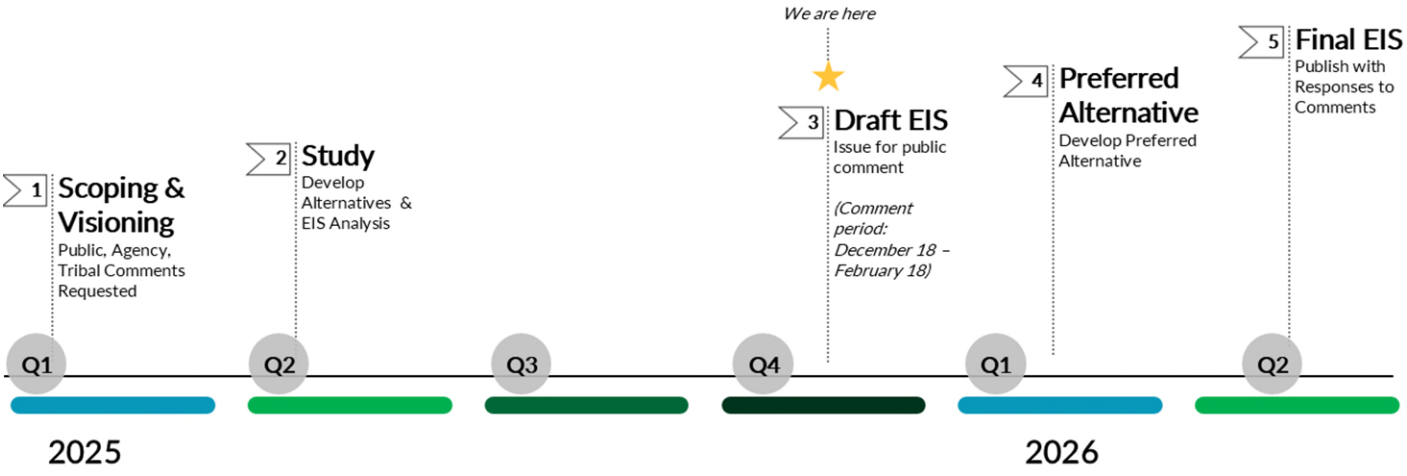
The Draft EIS presents three alternatives to test different growth patterns and policies. It is expected that the City will create a preferred alternative based on public input and the Draft EIS evaluation of the range of the alternatives. The preferred alternative may be one of the action alternatives or be a combination of one or more features of any of the studied alternatives. The Final EIS will evaluate the preferred alternative and respond to comments received on the Draft EIS.

2.5 SEPA Process

An EIS is an informational document that provides the City, public, Tribes, and agencies with environmental information to be considered in the decision-making process. An EIS is required under the State Environmental Policy Act (SEPA) for larger projects or for major plans, regulations, and programs. An EIS describes potential environmental impacts, reasonable alternatives, and ways to avoid or minimize negative impacts that could result from implementation of the Comprehensive Plan. The EIS evaluation and mitigation measures will inform the City of Spokane Comprehensive Plan Periodic Update.

The process for an EIS includes a scoping period to share likely topics and alternatives and invite comments, a comment period on the Draft EIS, and a Final EIS that responds to comments. See **Exhibit 2.5-1**. The scoping period lasted from February 5, 2025 to April 7, 2025. The Draft EIS Comment period extends from **December 18, 2025 to February 18, 2026**. See the **Fact Sheet** for more information about how to comment.

Exhibit 2.5-1. SEPA EIS Steps



2.6 Benefits and Disadvantages of Delaying the Proposed Action

SEPA requires an EIS to address "the benefits and disadvantages of reserving for some future time the implementation of the proposal, as compared with possible approval at this time. The agency perspective should be that each generation is, in effect, a trustee of the environment for succeeding generations. Particular attention should be given to the possibility of foreclosing future options by implementing the proposal." (WAC 197-11-440(5)(vii) While the City has no intent to delay adoption that is required by state law under GMA, this section addresses the potential benefits and disadvantages of delaying the proposed action.

The benefits of delaying the proposed action are to retain a growth strategy that meets total housing growth targets and contributes jobs at a greater rate than trends. The proposed action also provides for growth strategies that allow for more walking and biking trips, and housing closer to jobs, and implementation of climate policies that could help reduce greenhouse gas emissions and modestly improve vehicle miles travelled per capita.

The disadvantages of delaying the proposal would include reduced housing capacity in housing types that are more affordable and lack of consistency with affordable housing targets. There would be less consistency with State requirements to address racial disparities and displacement risk and undo the harm already done, particularly in creating housing opportunities. The capital facilities plan would not be updated to direct resources to address demand due to growth. If not implementing a new Comprehensive Plan, the City would not fully address emerging needs for climate adaptation and mitigation, or review and update its critical areas regulations.

3 Environment, Impacts, and Mitigation Measures

This chapter describes the affected environment, potential impacts, and mitigation measures for the following topics:

- Section 3.1 Earth, Water Quality, and Water Resources
- Section 3.2 Air Quality/Greenhouse Gase Emissions
- Section 3.3 Plants and Animals
- Section 3.4 Land Use Patterns and Urban Form
- Section 3.5 Population, Employment, and Housing
- Section 3.6 Relationship to Plans, Policies, and Regulations
- Section 3.7 Transportation
- Section 3.8 Public Services
- Section 3.9 Utilities

Following a description of current conditions (affected environment), the analysis compares and contrasts the alternatives and provides mitigation measures for identified impacts. It also summarizes whether there are significant unavoidable adverse impacts.

3.1 Earth, Water Quality, and Water Resources

This section discusses critical land areas and water resources in the study area, as identified in the Affected Environment section. Thresholds of significance used to identify potential impacts to earth and water resources involve comprehensive planning changes that could result in the following:

- **Environmental Earth and Soil Hazards:** Disturbances of existing contaminated areas to levels that could endanger human health or the environment.
- **Surface Water Quality**: Increases in amount of pollution to receiving waters that would impair their designated uses (such as human contact and fish habitat).
- **Runoff Increases:** Impervious surface expansions that would increase runoff flow volumes and durations to streams by magnitudes resulting in bank scour and erosion.
- **Groundwater Recharge:** Impervious surface expansions that would decrease groundwater recharge beyond designated limits.
- **Groundwater Quality:** Increases in amount of pollution discharged to levels that would contaminate groundwater supplies.

3.1.1 Affected Environment

The affected environment elements for the earth and water resources analysis consist of:

- Earth: terrain, land use, impervious cover, soils and infiltration, geologic hazards, contaminated soils, and environmental health disparities.
- Water Resources: Surface waters, water quality impairments, shorelines, floodplains, groundwater resources, and environmental health disparities.

Earth

Terrain

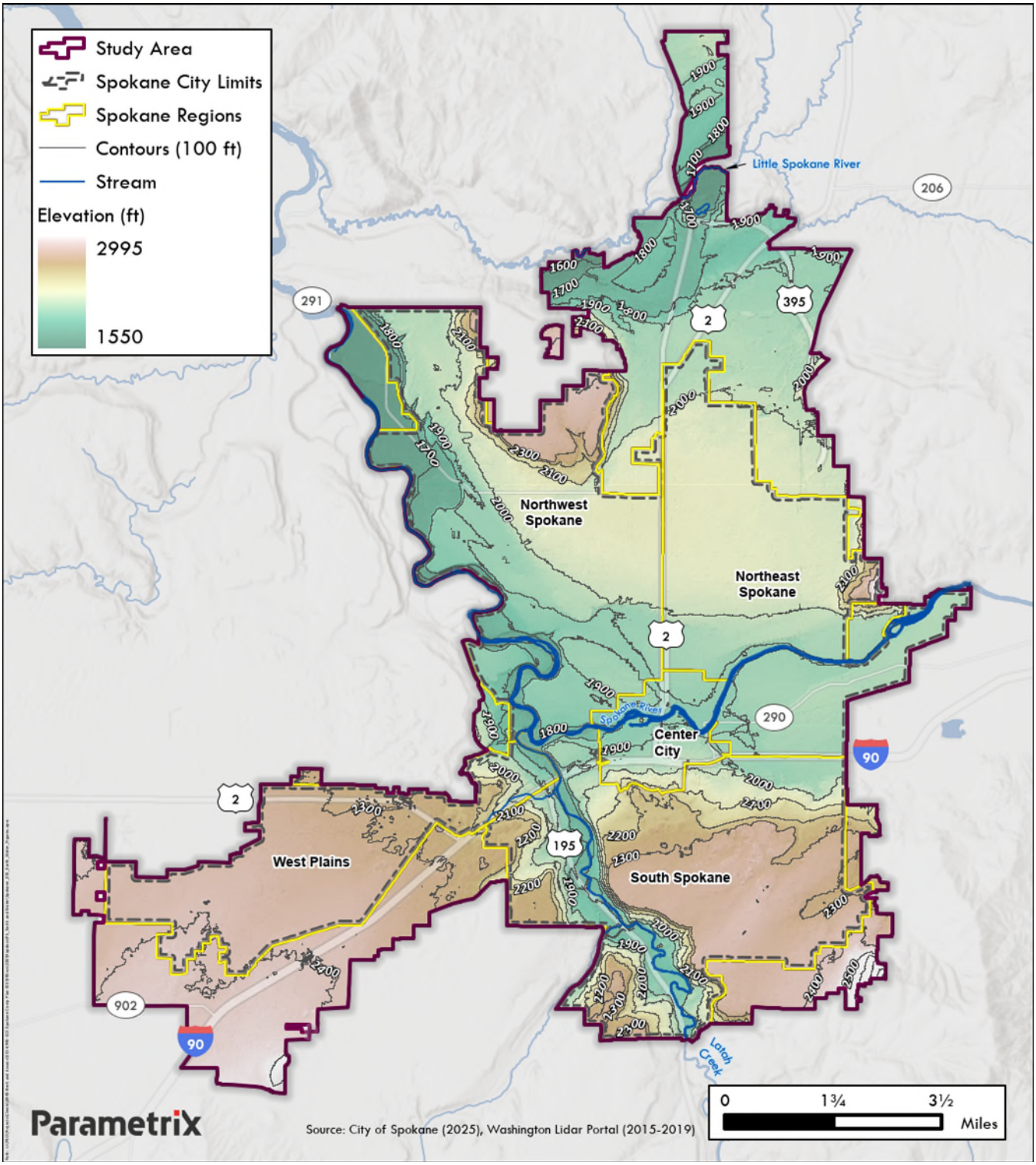
Steep slopes can be vulnerable to erosion and landslides, while flat areas may be at higher risk for flooding. The city and surrounding study area are relatively flat, with no more than two percent slopes in most areas. The steepest terrain is in South Spokane around the Latah Creek (also known as Hangman's Creek) corridor. A map of study area terrain is presented in **Exhibit 3.1-1**.

Land Use and Zoning

Spokane is the largest, most developed city in eastern Washington. Land development creates impacts to earth and water resources through increased vehicle use, commercial and industrial activities that produce waste substances, landscaping with chemicals, and other pollution-generating activities. Current zoning in the study area, which is an indicator of land use, is shown in **Exhibit 3.1-2.** Existing zones throughout the city consist predominantly of single-unit residential areas, with commercial and

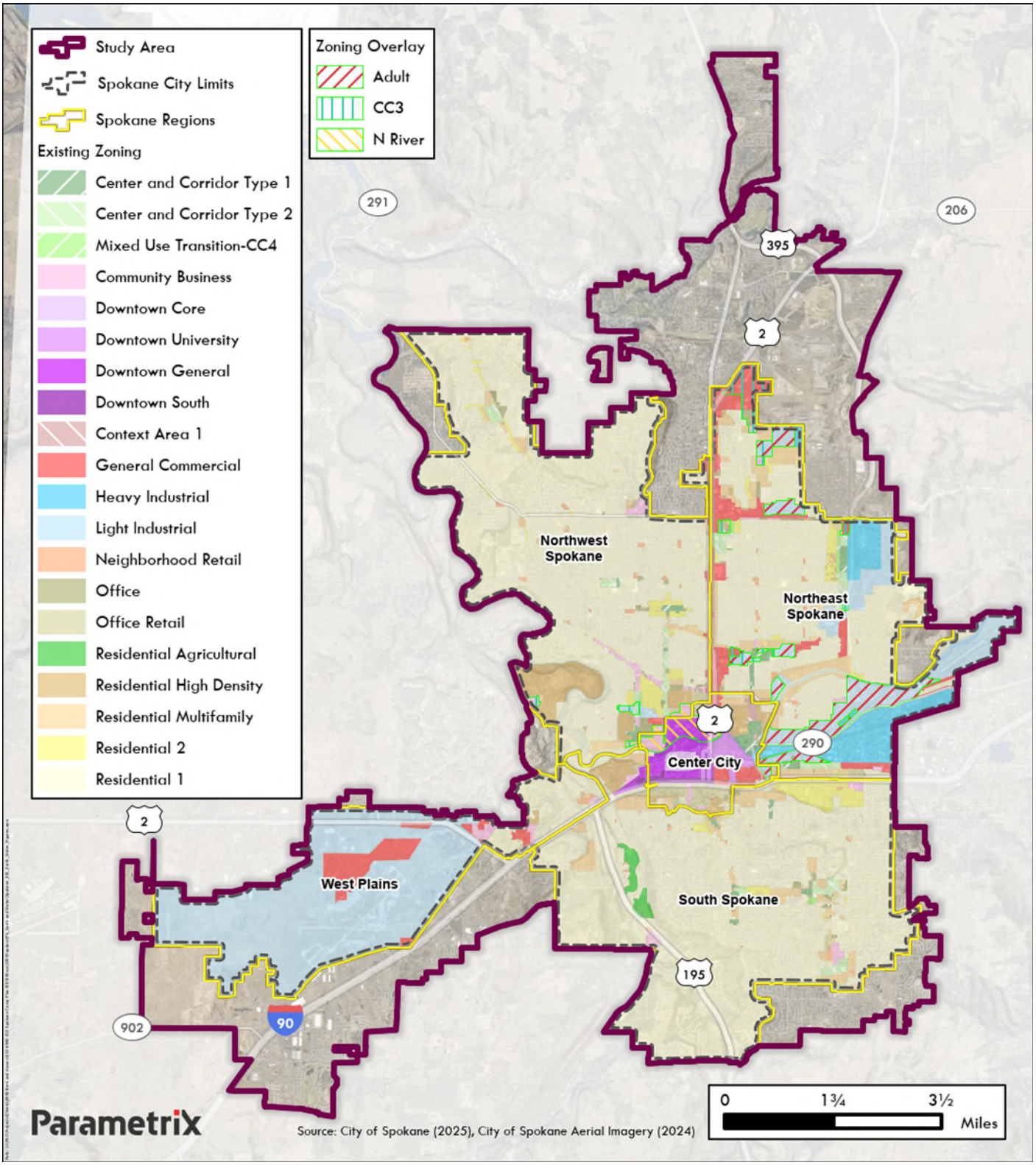
industrial areas focused in Center City and West Plains, respectively. Northeast Spokane has the widest variety of zoning classifications in the study area.

Exhibit 3.1-1. Terrain



Source: City of Spokane, 2025; Washington Lidar Portal, 2015 to 2019.

Exhibit 3.1-2. Existing Zoning



Source: City of Spokane 2025; City of Spokane Aerial Imagery, 2024.

Hard Surface (Impervious) Cover

The main feature of land development in a city like Spokane is the installation of hard surfaces (e.g., roads, parking, buildings, sidewalks; also known as impervious surfaces). The amount of hard surfaces versus vegetation impacts how much and how quickly rainfall runoff soaks into the earth or is transported to natural receiving waters. Typically, areas where more hard surfaces have been installed and vegetation has been removed have produced impacts on earth and water resources over time. These areas increase runoff volumes, erode streams, increase stream temperatures, decrease groundwater recharge, and can increase flooding and habitat contamination. In places where runoff infiltrates into the ground, untreated stormwater that soaks into the earth can potentially contaminate groundwater.

Existing hard surface cover in the study area is shown in **Exhibit 3.1-3.** The most densely occurring hard surface coverage is located in the Center City, followed by Northeast Spokane and Northwest Spokane. South Spokane has less dense hard surface coverage, and West Plains has the least with hard surfaces mainly located around the Spokane International Airport.

Soils and Infiltration

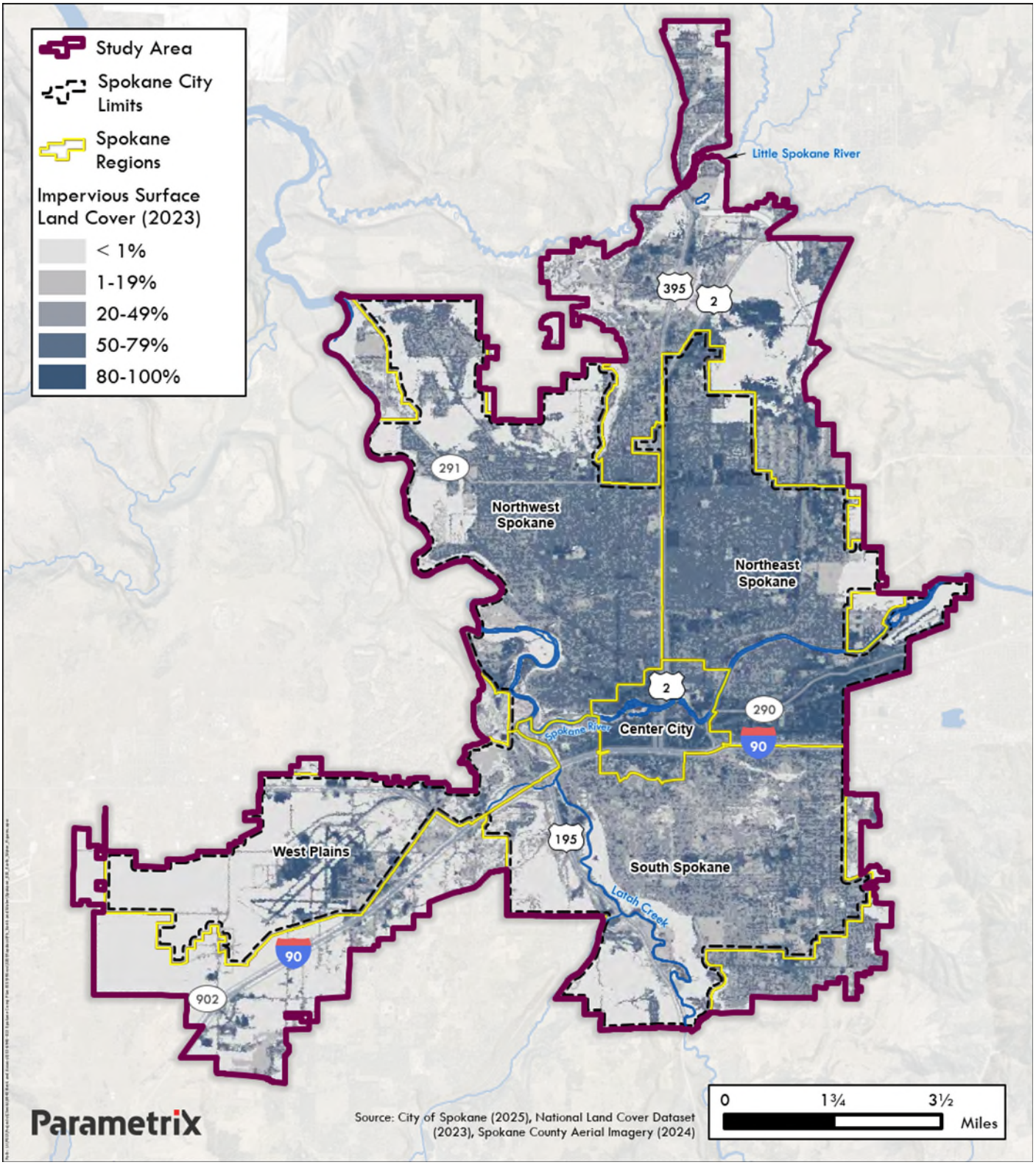
Soil type influences the ground's ability to infiltrate rainwater runoff, which can recharge groundwater aquifers and prevent high flows from scouring stream banks. In the study area, soil infiltration capacity in non-developed areas is high to moderate, as shown in **Exhibit 3.1-4**. Specific soil types are listed in **Exhibit 3.1-5**. Infiltration is typically not possible in areas of hard surface development, with the exception of sites where special porous materials have been used.

In the West Plains region, although the soils are classified as having high to moderate infiltration capabilities, impermeable shallow bedrock has been found that holds water near the surface. Additional information is presented in the Stormwater Management Planning of the West Plains Subarea of Spokane West Plains Geology and Hydrology Report (City of Spokane, 2013).

Hazardous Geology and Contaminated Soils

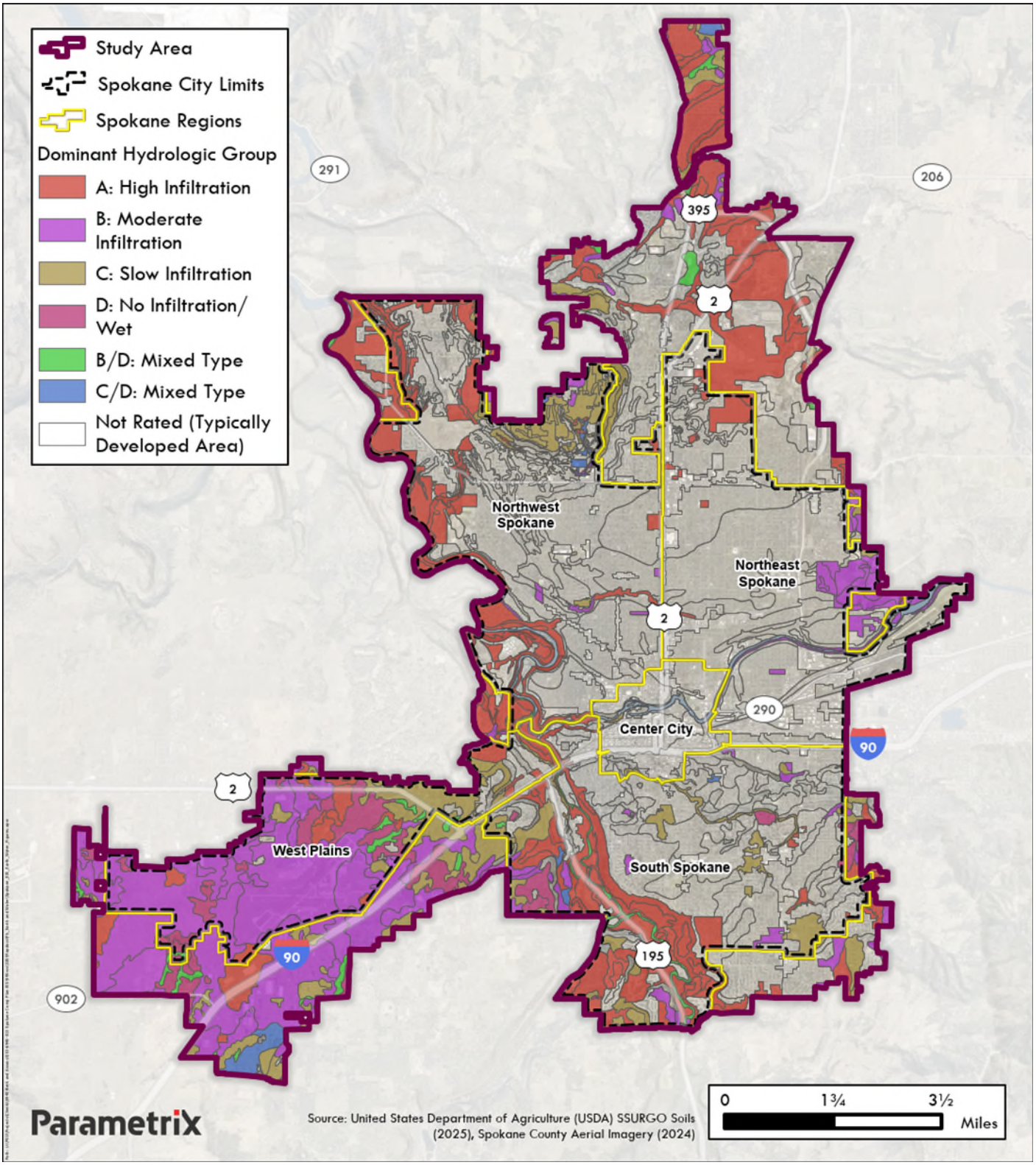
Erodible soils, landslide-prone geologic forms, and potentially contaminated areas identified on the Superfund National Priorities List in the study area are shown in **Exhibit 3.1-6**. The main soil and geology hazard areas are along Latah Creek and other areas in South Spokane and in the north and west portions of Northwest Spokane. Potentially contaminated sites are located in and north of Northeast Spokane. Information on groundwater contamination areas is presented in the Groundwater Resources section.

Exhibit 3.1-3. Existing Hard (Impervious) Surfaces



Source: City of Spokane, 2025; National Land Cover Dataset, 2023; Spokane County Aerial Imagery, 2024.

Exhibit 3.1-4. Hydrologic Soil Groups



Source: United States Department of Agriculture (USDA) SSURGO Soils, 2025; Spokane County Aerial Imagery, 2024.

Exhibit 3.1-5. Soil Type Summary

Hydrologic Soil Group	Soil Type
A – High Infiltration	Alecanyon, very stony-Cheney, complex
A – High Infiltration	Battleplain ashy sandy loam
A – High Infiltration	Battleplain ashy sandy loam, moist
A – High Infiltration	Battleplain, moist-Phoebe, complex
A – High Infiltration	Battleplain-Phoebe, dry, complex
A – High Infiltration	Elmira loamy sand
A – High Infiltration	Hagen ashy sandy loam
A – High Infiltration	Marble loamy sand
A – High Infiltration	Marble-Speigle, complex, mass wasted
A – High Infiltration	Marblespring fine gravelly loamy coarse sand
A – High Infiltration	Phoebe ashy sandy loam
A – High Infiltration	Phoebe ashy sandy loam, dry
A – High Infiltration	Phoebe, dry-Battleplain, complex
A – High Infiltration	Phoebe-Battleplain, moist, complex
A – High Infiltration	Spens very gravelly loamy coarse sand
A – High Infiltration	Spens very gravelly loamy coarse sand, cool
A – High Infiltration	Springdale gravelly ashy coarse sandy loam
A – High Infiltration	Wapal gravelly ashy coarse sandy loam
B – Moderate Infiltration	Brevco-Rock outcrop, complex
B – Moderate Infiltration	Brincken ashy silt loam
B – Moderate Infiltration	Brincken, moist-Fourmound, complex
B – Moderate Infiltration	Brincken, moist-Speigle, complex, mass wasted
B – Moderate Infiltration	Brincken, moist-Uhlig, complex
B – Moderate Infiltration	Cheney ashy silt loam
B – Moderate Infiltration	Cheney-Alecanyon, complex
B – Moderate Infiltration	Cheney-Seaboldt, dry, complex
B – Moderate Infiltration	Clayton-Hagen, complex
B – Moderate Infiltration	Garrison very gravelly ashy loam

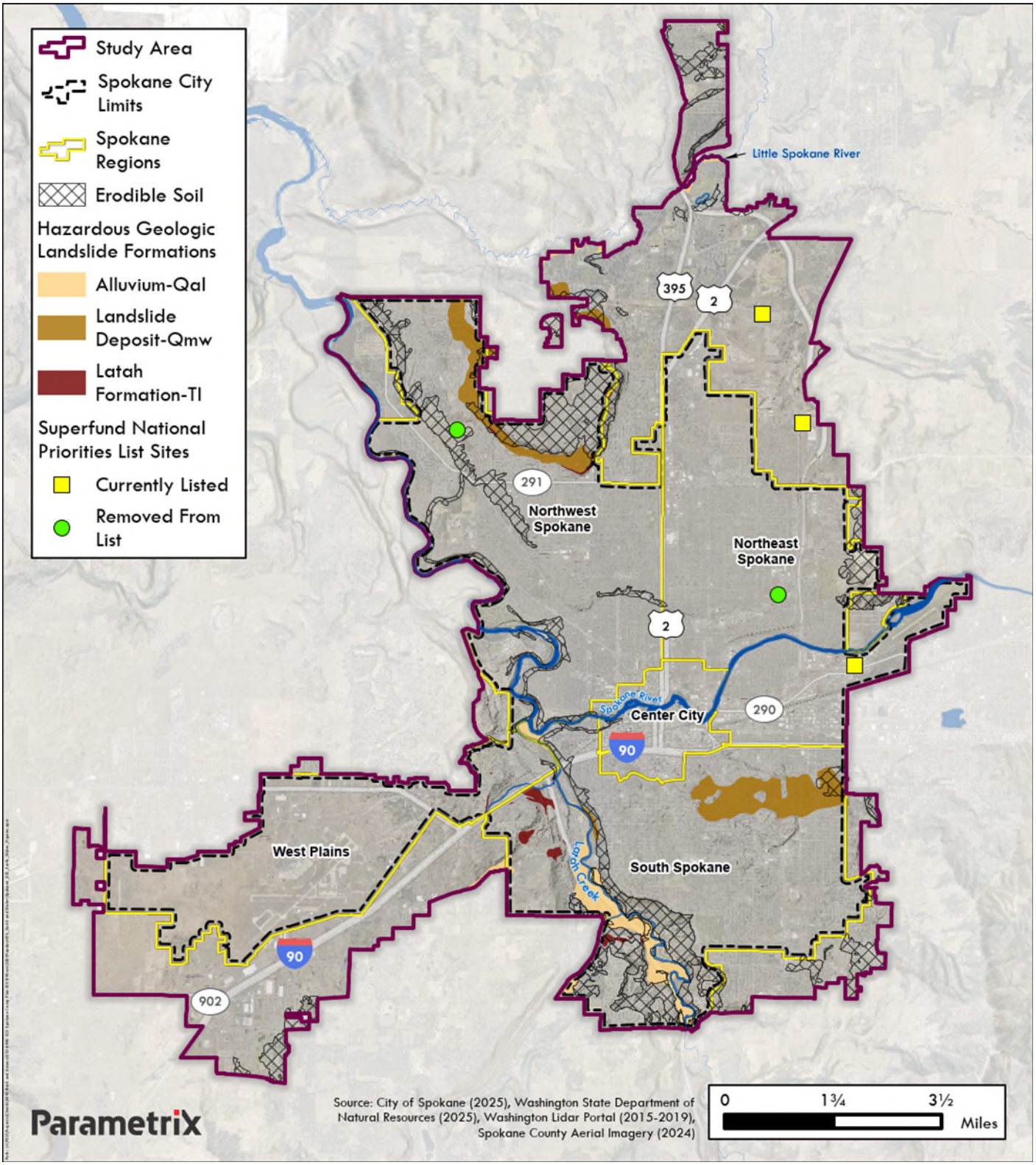
Hydrologic Soil Group	Soil Type
B – Moderate Infiltration	Haploxerolls ashy silt loam, channeled
B – Moderate Infiltration	Lenz-Rock outcrop, complex
B – Moderate Infiltration	Lenz-Spokane, complex
B – Moderate Infiltration	Opportunity very gravelly ashy loam
B – Moderate Infiltration	Quinnamose-Micapeak, complex
B – Moderate Infiltration	Scoap-Wapal, complex
B – Moderate Infiltration	Speigle cobbly ashy loam
B – Moderate Infiltration	Speigle-Rock outcrop, complex
B – Moderate Infiltration	Stutler-Springdale, complex
B – Moderate Infiltration	Uhlig ashy silt loam
B – Moderate Infiltration	Uhlig ashy silt loam, dry
C – Slow Infiltration	Bobbitt-Lacy, complex
C – Slow Infiltration	Bobbitt-Speigle, complex
C – Slow Infiltration	Caldwell-Thatuna, complex
C – Slow Infiltration	Gibbs ashy silt loam
C – Slow Infiltration	Glenrose ashy silt loam
C – Slow Infiltration	Klickson gravelly ashy silt loam
C – Slow Infiltration	Klickson-Speigle, complex
C – Slow Infiltration	Klickson-Speigle, complex, mass wasted
C – Slow Infiltration	Klickson-Speigle-Rock outcrop, complex
C – Slow Infiltration	Kramerhill ashy loam
C – Slow Infiltration	Kramerhill-Spokane, complex
C – Slow Infiltration	Kramerhill-Uhlig-Skalan, complex
C – Slow Infiltration	Kruse ashy silt loam
C – Slow Infiltration	Lenz-Spokane, complex
C – Slow Infiltration	Micapeak-Rock outcrop, complex
C – Slow Infiltration	Narcisse silt loam
C – Slow Infiltration	Northstar-Rock outcrop, complex
C – Slow Infiltration	Northstar-Rock outcrop-Rockly, complex

Hydrologic Soil Group	Soil Type
C – Slow Infiltration	Northstar-Rockly, complex
C – Slow Infiltration	Seaboldt ashy loam
C – Slow Infiltration	Seaboldt ashy loam, dry
C – Slow Infiltration	Seaboldt, warm-Brincken, moist, complex
C – Slow Infiltration	Spokane-Rock outcrop, complex
C – Slow Infiltration	Urban land-Seaboldt, disturbed, complex
C – Slow Infiltration	Urban land-Seaboldt, warm, disturbed-Brincken, moist, complex
C – Slow Infiltration	Xerolls silt loam, cool, mass wasted
C – Slow Infiltration	Xerolls silt loam, warm, mass wasted
D – No Infiltration/Wet	Rockly-Cocolalla, complex
D – No Infiltration/Wet	Rockly-Deno, complex
D – No Infiltration/Wet	Rockly-Fourmound, complex
B/D – Mixed Type	Aquepts ashy loam, frigid
B/D – Mixed Type	Cocolalla ashy silt loam
B/D – Mixed Type	Cocolalla-Hardesty, complex
B/D – Mixed Type	Endoaquolls and Fluvaquents
B/D – Mixed Type	Hardesty ashy silt loam
B/D – Mixed Type	Hoodoo-Kronquist, complex
B/D – Mixed Type	Peone-Saltese, complex
B/D – Mixed Type	Saltese muck
C/D – Mixed Type	Dearyton ashy silt loam
C/D – Mixed Type	Lakespring ashy loam
C/D – Mixed Type	Lakespring-Brincken, moist, complex
C/D – Mixed Type	Nez Perce ashy silt loam
(Not classified)	Pits-Dumps, complex
(Not classified)	Riverwash
(Not classified)	Rock outcrop-Klickson-Speigle, complex
(Not classified)	Rock outcrop-Northstar, complex
(Not classified)	Rock outcrop-Rubble land, complex, cliffs

Hydrologic Soil Group	Soil Type
(Not classified)	Speigle-Rubble land-Rock outcrop, complex
(Not classified)	Urban land, basalt bedrock substratum
(Not classified)	Urban land, gravelly substratum
(Not classified)	Urban land, sandy substratum
(Not classified)	Urban land-Lakespring, disturbed, complex
(Not classified)	Urban land-Lenz, disturbed, complex
(Not classified)	Urban land-Marble, disturbed, complex
(Not classified)	Urban land-Marblespring, disturbed, complex
(Not classified)	Urban land-Northstar, disturbed, complex
(Not classified)	Urban land-Opportunity, disturbed, complex
(Not classified)	Urban land-Phoebe, disturbed, complex
(Not classified)	Urban land-Seaboldt, disturbed, complex
(Not classified)	Urban land-Seaboldt, warm, disturbed-Brincken, moist, complex
(Not classified)	Urban land-Spens, disturbed, complex
(Not classified)	Urban land-Spokane, disturbed, complex
(Not classified)	Urban land-Springdale, disturbed, complex
(Not classified)	Urban land-Uhlig, disturbed, complex
(Not classified)	Water

Source: United States Department of Agriculture (USDA) SSURGO Soils, 2025.

Exhibit 3.1-6. Hazardous Geology



Source: City of Spokane, 2025; Washington State Department of Natural Resources (WA DNR), 2025; Washington Lidar Portal, 2015 to 2019.

Water Resources

Surface Waters

The study area includes five watersheds, shown in **Exhibit 3.1-7**. The main surface receiving waters are the Spokane River and Latah Creek (also known as Hangman's Creek), both of which are fish-bearing. Discussion of fish habitat is presented in **Section 3.3 Plants and Animals**. A summary of the surface water features in the study area is presented in **Exhibit 3.1-8**.

Water Quality Impairments

As listed in **Exhibit 3.1-8** and shown in **Exhibit 3.1-9**, four water bodies in the study area have been identified on the Washington State Department of Ecology (Ecology) Clean Water Act Section 303(d) List as having water quality impairments (Ecology, 2018). For several of the contaminants, formal water quality improvement plans are in place.

Shorelines

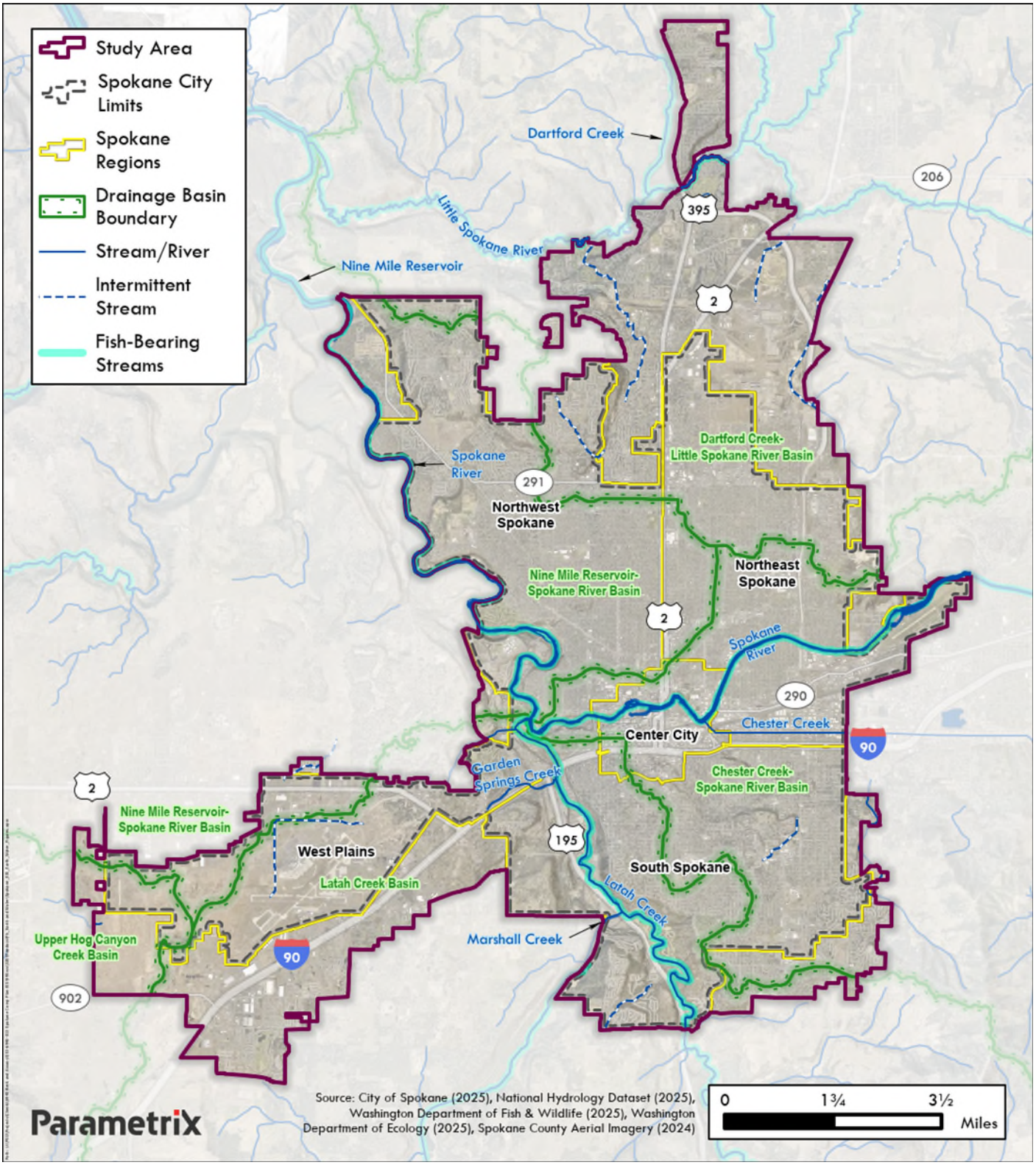
As listed in **Exhibit 3.1-8** and shown in **Exhibit 3.1-10**, three water bodies in the study area have been designated by Washington Administrative Code (WAC) 173-18 Shoreline Management Act as having Shorelines of the State as well as Shorelines of Statewide Significance. Shorelines with these designations have stricter protections from modification through the requirements in WAC 173-26 State Shoreline Master Program.

Floodplains

Flood hazard areas in the study area mapped by the Federal Emergency Management Agency (FEMA) are shown in **Exhibit 3.1-11**. Special flood hazard areas, also known as 100-year floodplains, are those areas subject to flooding by the base flood. The base flood event has a 1 percent chance of occurring any given year and is commonly known as the 100-year flood. Flood hazard areas known as 500-year floodplains have an expected inundation chance of 0.2 percent each year. Floodways are the main watercourse channel and adjacent lands that must be kept free of fill or development to avoid increasing flood elevations. Floodways are defined through detailed hydraulic analysis; therefore, many floodplains have not yet had their associated floodways identified. Due to the flat terrain in the study area, some floodplains are associated with intermittent streams, meaning these areas see channel flow and overland flooding during flood events but have no channel flow during dry periods.

Climate change may affect floodplains in the future. The FEMA Federal Flood Risk Management Standard provides guidance on flood risk management to account for climate change by (1) conducting site-specific hydraulic analysis using climate forecasts, (2) designing facilities based on the 100-year based flood event with 2 to 3 feet of freeboard added, or (3) designing facilities based on the 500-year flood elevation (FEMA 2024).

Exhibit 3.1-7. Surface Waters



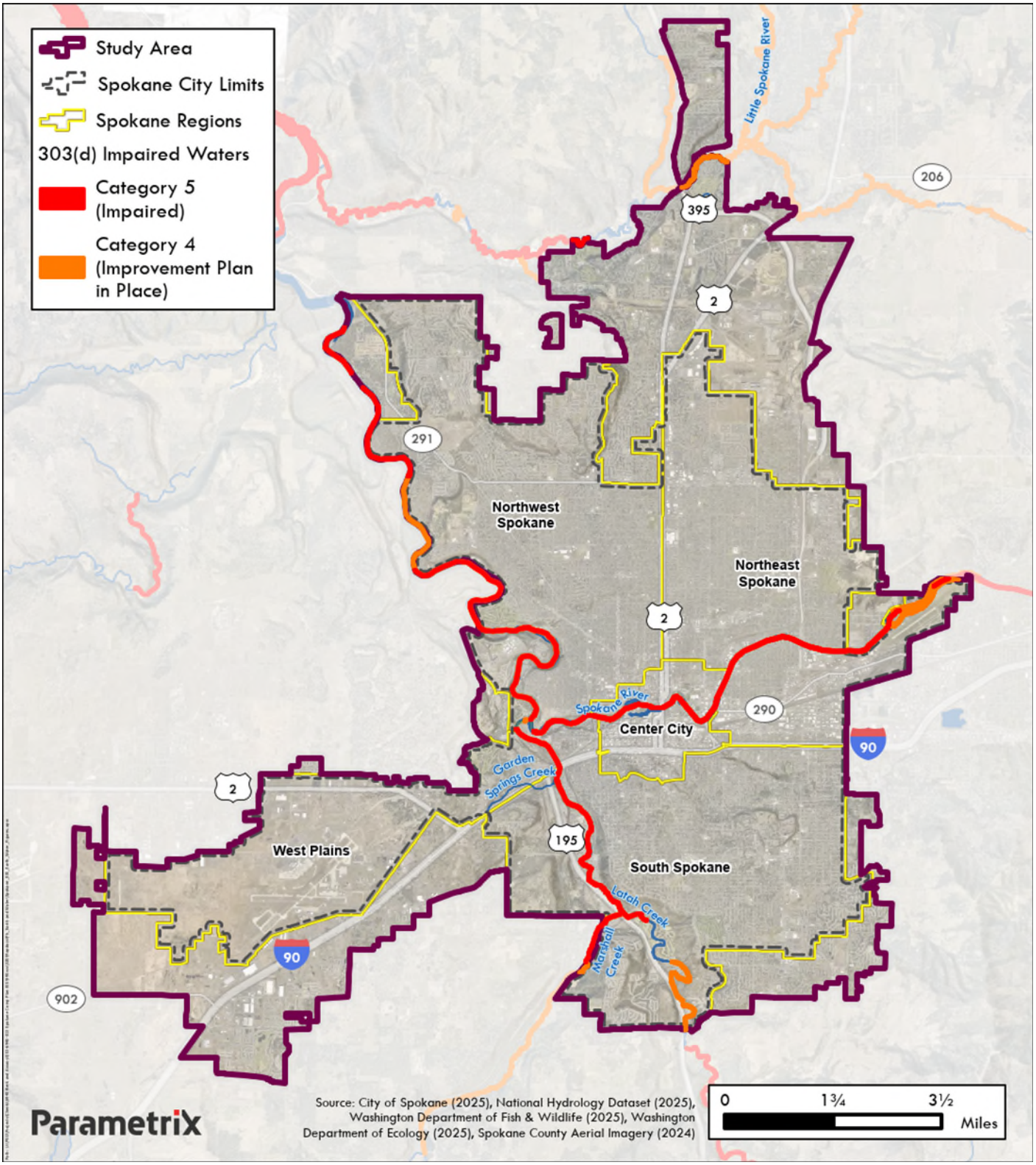
Sources: City of Spokane, 2025; National Hydrology Dataset, Washington, 2025; Department of Fish & Wildlife, 2025; Washington Department of Ecology, 2025; and Spokane County Aerial Imagery, 2024.

Exhibit 3.1-8. Surface Waters Summary Table

Water Body	303(d) Water Quality Impairment	Fish-Bearing (Y/N)	Shoreline of State (Y/N)
Latah (Hangman) Creek	Category 4A: Temperature Category 5: Dissolved oxygen, pH	Y	Y*
Little Spokane River	Category 4A: Dissolved oxygen, turbidity Category 5: Temperature	Y	Y*
Marshall Creek	Category 4A: Bacteria - Fecal coliform, Temperature Category 5: Dissolved oxygen	N	N
Spokane River	Category 4A: dissolved oxygen, lead, zinc Category 4B: arsenic, cadmium, chromium, copper, lead, mercury, polybrominated diphenyl ethers (PBDEs), silver, zinc Category 5: 2,3,7,8-tcdd (dioxin), bacteria - fecal coliform, methyl mercury, polybrominated diphenyl ethers (PBDEs), polychlorinated biphenyls (PCBs)	Y	Y*

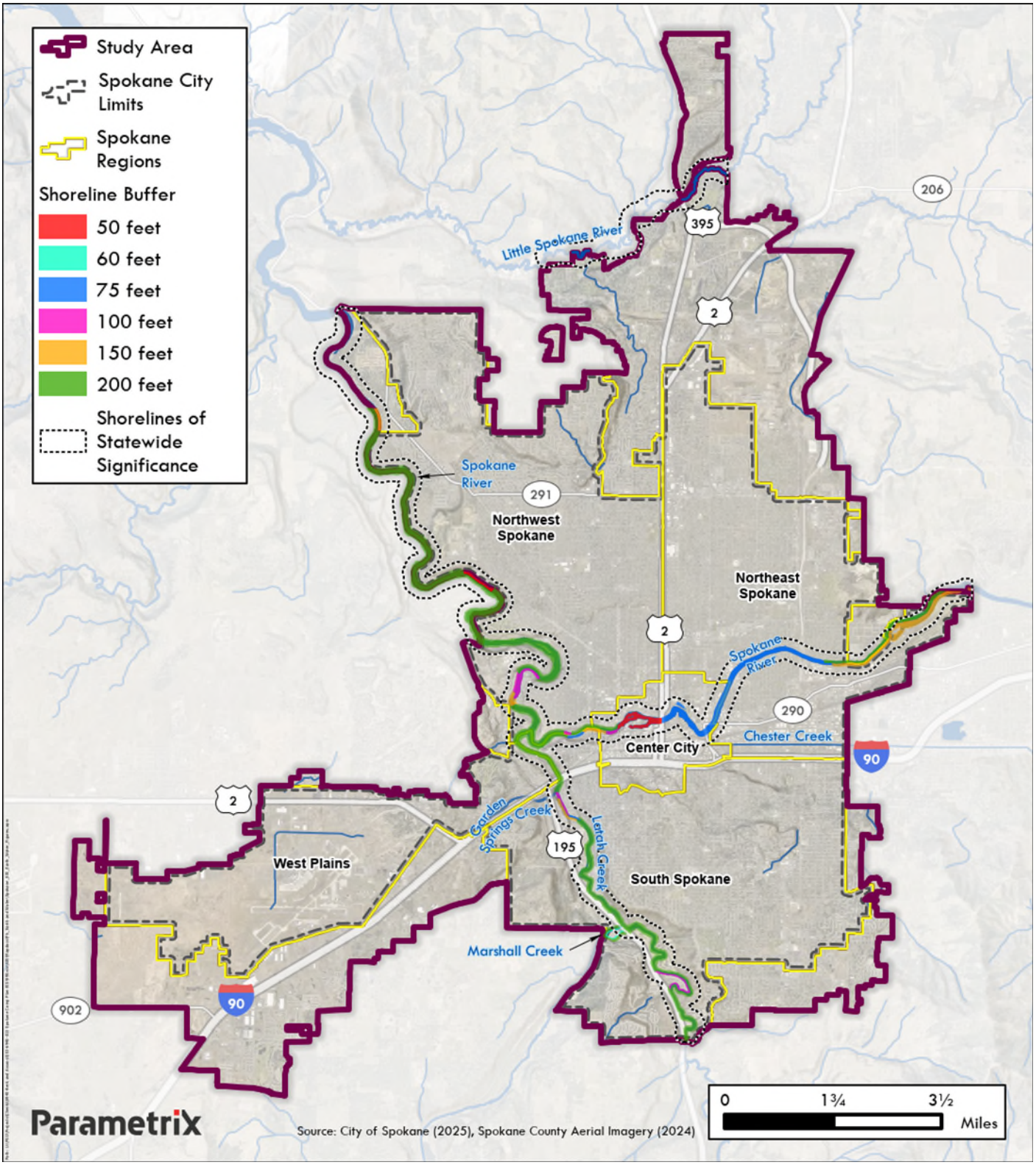
Notes: Category 4A – An EPA-approved Total Maximum Daily Load (TMDL) plan is in place and implemented; Category 4B – A pollution control program, similar to a TMDL plan, is in place that is expected to address the issue; Category 5 – Data shows water quality standards have been violated, improvement plan has not yet been developed.
*Shorelines of the State that are also designated at Shorelines of Statewide Significance are marked with an asterisk.
Source: Washington Department of Ecology, 2018.

Exhibit 3.1-9. Water Quality Impairments



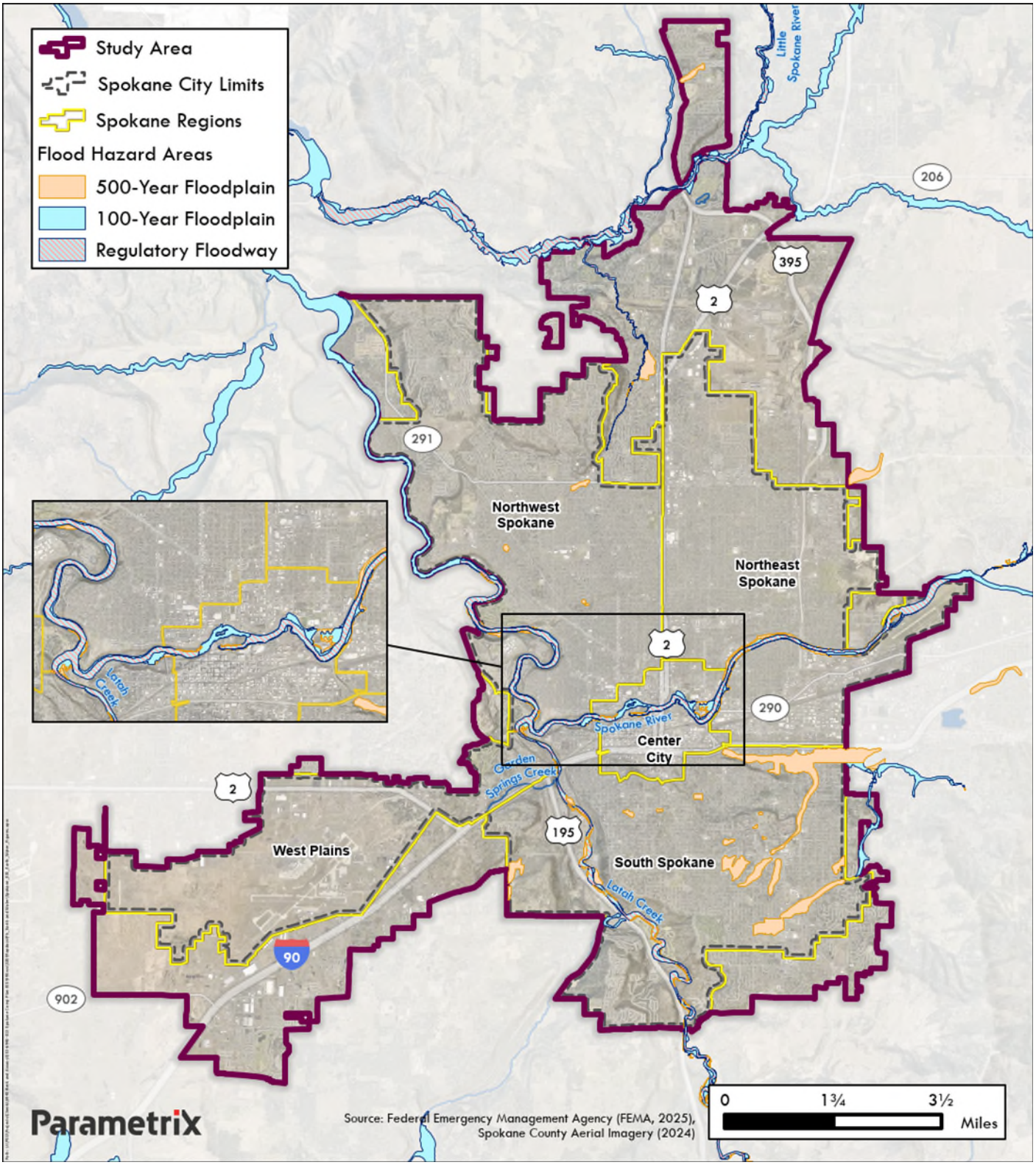
Sources: City of Spokane, 2025; National Hydrology Dataset , 2025; Washington Department of Fish & Wildlife, 2025; Washington Department of Ecology, 2025; and Spokane County Aerial Imagery, 2024.

Exhibit 3.1-10. Shorelines



Source: City of Spokane, 2025; Spokane County Aerial Imagery,2024.

Exhibit 3.1-11. FEMA Flood Zones



Source: Federal Emergency Management Agency (FEMA), 2025 ; and Spokane County Aerial Imagery, 2024.

Groundwater Resources

Groundwater resources such as critical aquifer recharge and wellhead protection areas in the study area are shown in **Exhibit 3.1-12**. These areas are protected through regulation of development and other activities that could impact groundwater recharge or transport of pollutants. Also, as a result of an August 5, 2025, ballot measure, the Spokane Valley Rathdrum Prairie Aquifer Protection Area will be expanded to include all areas within the city boundary (presently it includes none of the city) beginning on January 1, 2026.

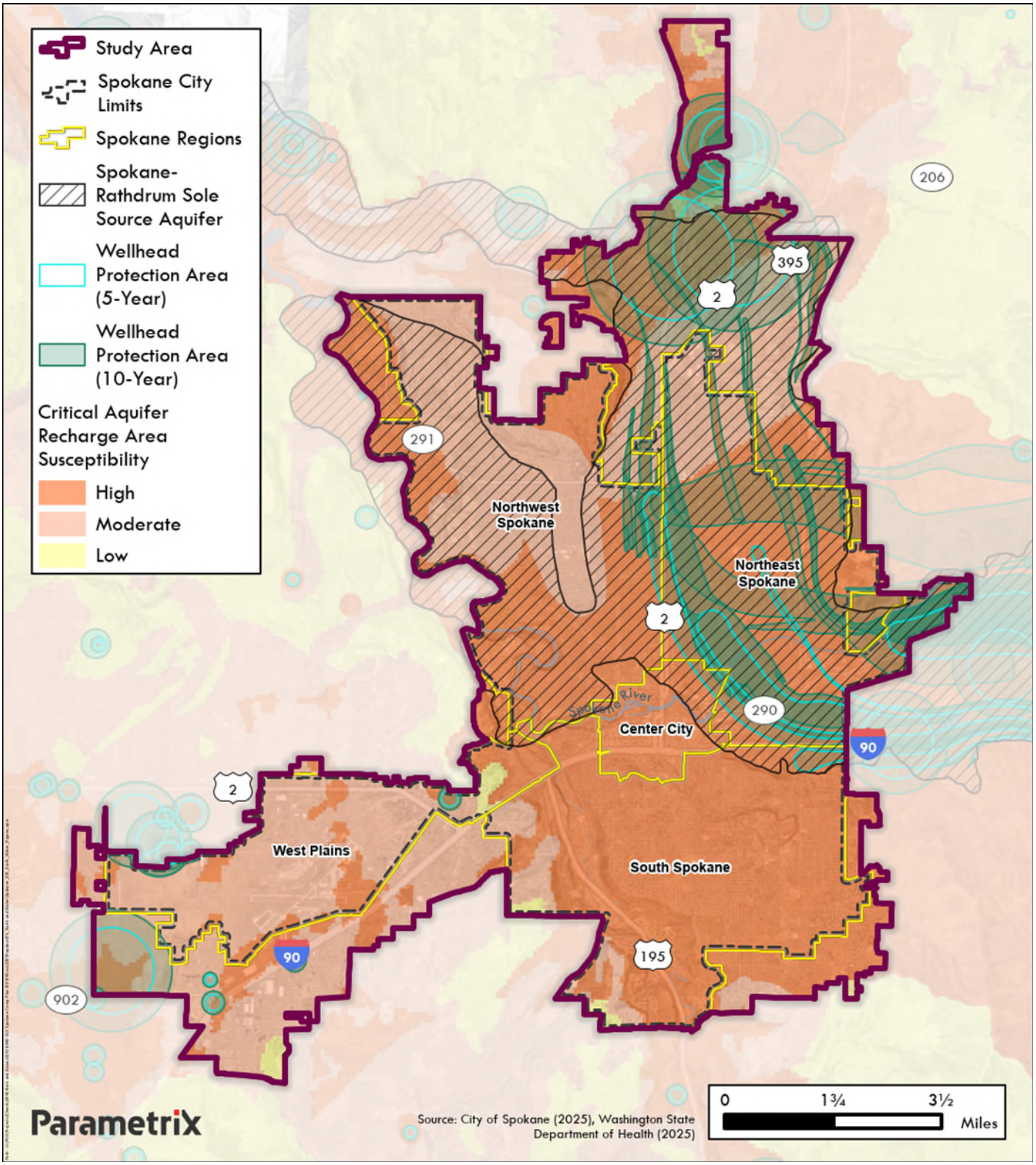
Information on Ecology's findings of per- and polyfluoroalkyl substances (PFAS) contamination in private-well groundwater in the West Plains region of the city is presented in **Exhibit 3.1-13** and **Exhibit 3.1-14**. Additional information on PFAS sampling throughout the city is presented in the City of Spokane 2024 Water Quality Report available at https://my.spokanecity.org/publicworks/water/quality/.

The study area contains a portion of the Spokane Valley-Rathdrum Prairie Sole Source Aquifer, located mainly in Northwest Spokane and Northeast Spokane. Sole source aquifers are identified by the U.S. Environmental Protection Agency (EPA) as aquifers that supply at least 50 percent of the drinking water for a service area where there are no reasonably available alternative drinking water sources should the aquifer become contaminated. In addition, wellhead protection areas are defined by protection categories that refer to the amount of time it would take contamination to reach the wellhead from the specified area within each boundary. Projection boundaries include the 5- and 10-year time-of-travel boundaries. Required levels of protection and restrictions on certain activities increase for boundaries closer to the wellhead.

Environmental Health Disparities

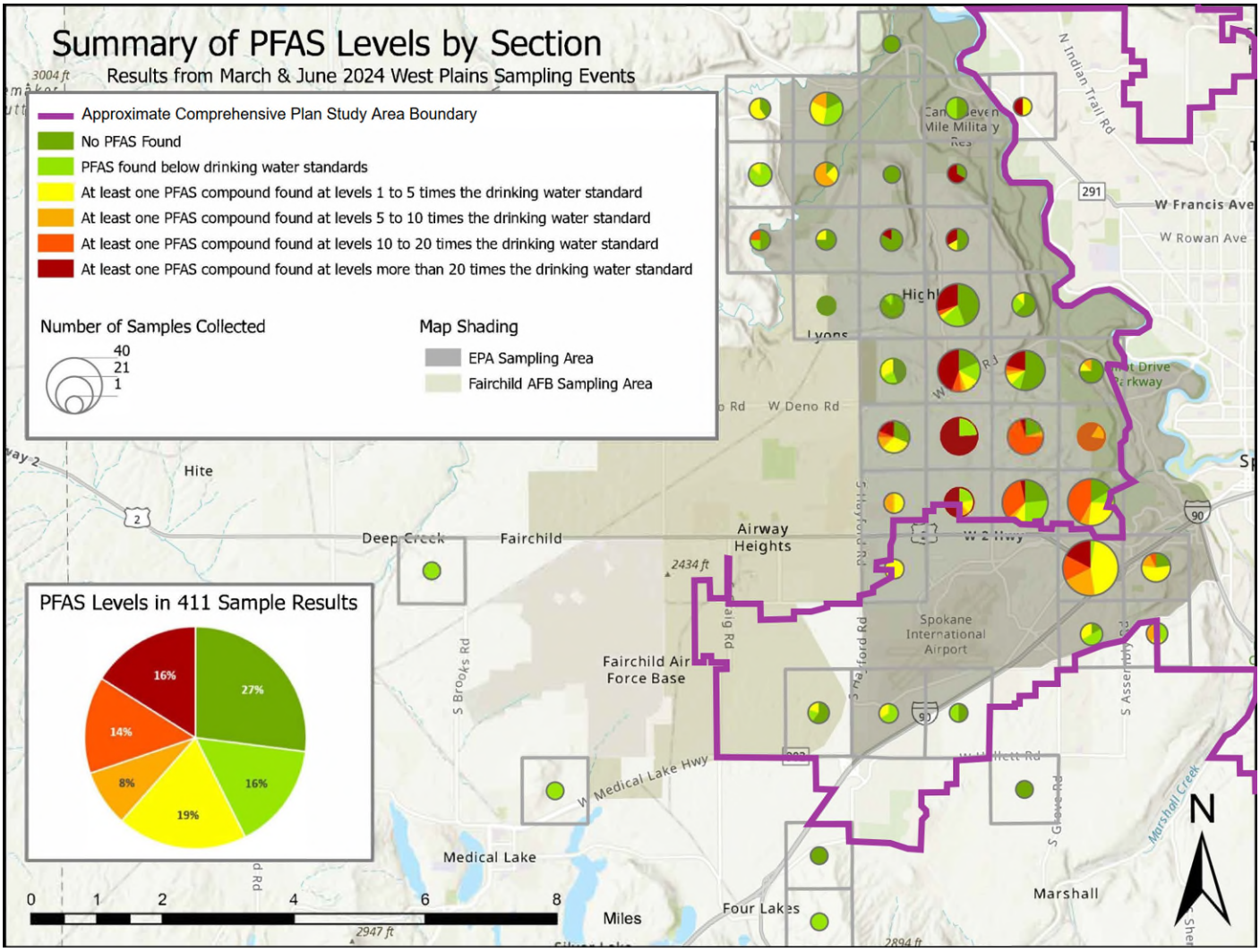
Environmental health disparities in the study area based on the Washington State Department of Health (DOH) data is shown in **Exhibit 3.1-15**. This data compares environmental and socioeconomic risk factors across all of Washington U.S. census tracts and consists of indicators like proximity to hazardous waste facilities, proximity to wastewater discharges, income, and race. Highly impacted communities, which are defined as vulnerable populations in close proximity to environmental hazards, are considered those in areas ranked with risk factors of 9 or 10. In the City of Spokane, highly impacted communities are found primarily along I-90 and throughout Center City and Northeast Spokane.

Exhibit 3.1-12. Groundwater Resources



Sources: City of Spokane, 2025; Washington State Department of Health, 2025.

Exhibit 3.1-13. West Plains Private-Well PFAS Levels by Location



Source: Washington Department of Ecology, 2025.

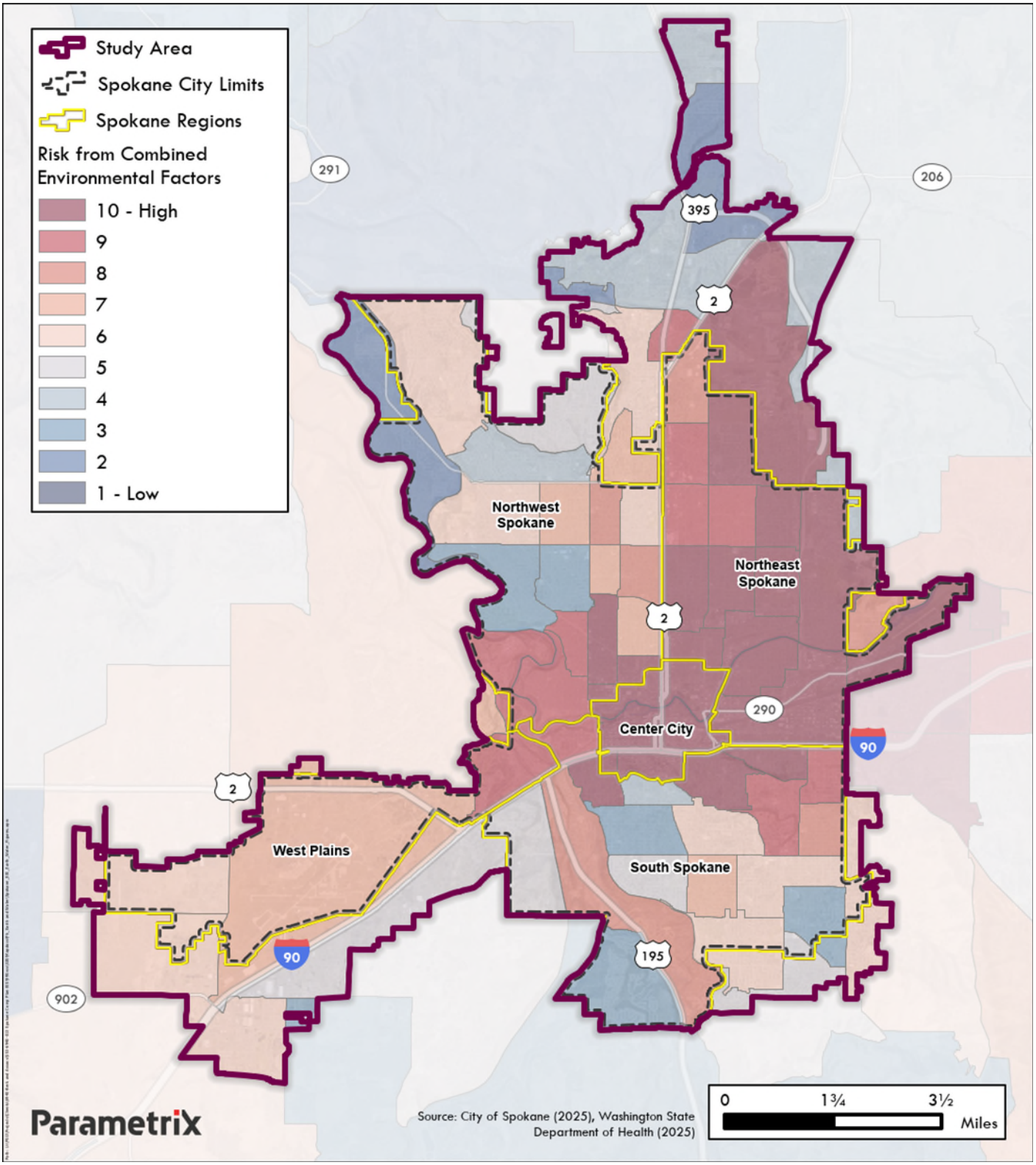
Exhibit 3.1-14. West Plains PFAS Private Well Sampling Data

Sample results	Number of locations*	Percent of locations*
Private wells that do not have PFAS	111	27%
Private wells with PFAS below drinking water standards	64	16%
Private wells with PFAS above drinking water standards	236	57%
Total	**411**	**100%**

* Includes locations outside of Comprehensive Plan study area.

Source: Washington Department of Ecology, 2025.

Exhibit 3.1-15. Environmental Health Disparities



Source: City of Spokane, 2025; Washington State Department of Health, 2025.

3.1.2 Impacts

Impacts Common to All Alternatives

This section discusses impacts to earth and water resources that are common to all alternatives. It should be noted that most impacts of future development projects on earth and water resources would be avoided or minimized through compliance with the Spokane Regional Stormwater Manual (Spokane et. al. 2008), Spokane Municipal Code (SMC) 17D.060 – Stormwater Facilities, SMC 17D.090 – Erosion and Sediment Control, SMC Title 17E – Environmental Standards (which covers aquifer protection, fish and wildlife conservation areas, floodplain management, geologically hazardous areas, shoreline regulations, and wetlands protection), and other applicable federal, state, and local regulations. Details of impact mitigation are discussed in **Exhibit 3.1-11**.

The impacts to earth and water resources common to all plan alternatives are:

- Construction impacts—Construction of development projects that may result from the plan alternatives would remove vegetation and/or hard surfaces, which can result in soil disturbance, erosion, water pollution, and soil contamination. In addition, vehicles, machinery, and materials brought to a construction site can introduce oil, grease, chemicals, and other pollutants that pose a risk to earth and water resources if not managed properly. Best management practices (BMPs) required by development permits to control construction activities and rainfall runoff are expected to prevent or minimize adverse impacts.
- Potential for increased pollution—Projected increases in population, jobs, and housing densities are used as indicators of increased pollution in the earth and water impacts analysis. The plan accommodation of higher populations in the urban growth center through increased jobs and housing will provide benefits to the community and protect natural resources in the region by preventing developmental sprawl in rural areas. However, increased jobs and housing can also increase impacts to earth and water resources in the city through increased vehicle use, commercial and light industrial activities that produce waste substances, landscaping with chemicals, and other pollution-generating activities. These impacts would be mitigated by the presence of stormwater runoff BMPs on roadways and other pollution-generating surfaces. A comparison of the potential for increased pollution risk to earth and water resources across the plan alternatives is presented in **Exhibit 3.1-15**.
- Potential for increased rainfall runoff flows—Projections for increased housing are used in the earth and water resources impacts analysis as indicators of increased rainfall runoff. As discussed in **Section 3.1.1**, the amount of hard surfaces versus vegetation impacts how much and how quickly rainfall runoff and pollutants may soak into the earth or are transported to natural receiving waters. A comparison of the potential for increased runoff impacts to earth and water resources across the plan alternatives is presented in **Exhibit 3.1-15**. Maps showing the density projections of each alternative against already developed hard surfaces are shown in **Exhibit 3.1-16** through **Exhibit 3.1-19**. Additional considerations of changes in land cover, including changes in vegetation, are discussed in **Section 3.3 Plants and Animals.**

Comparison of Impacts

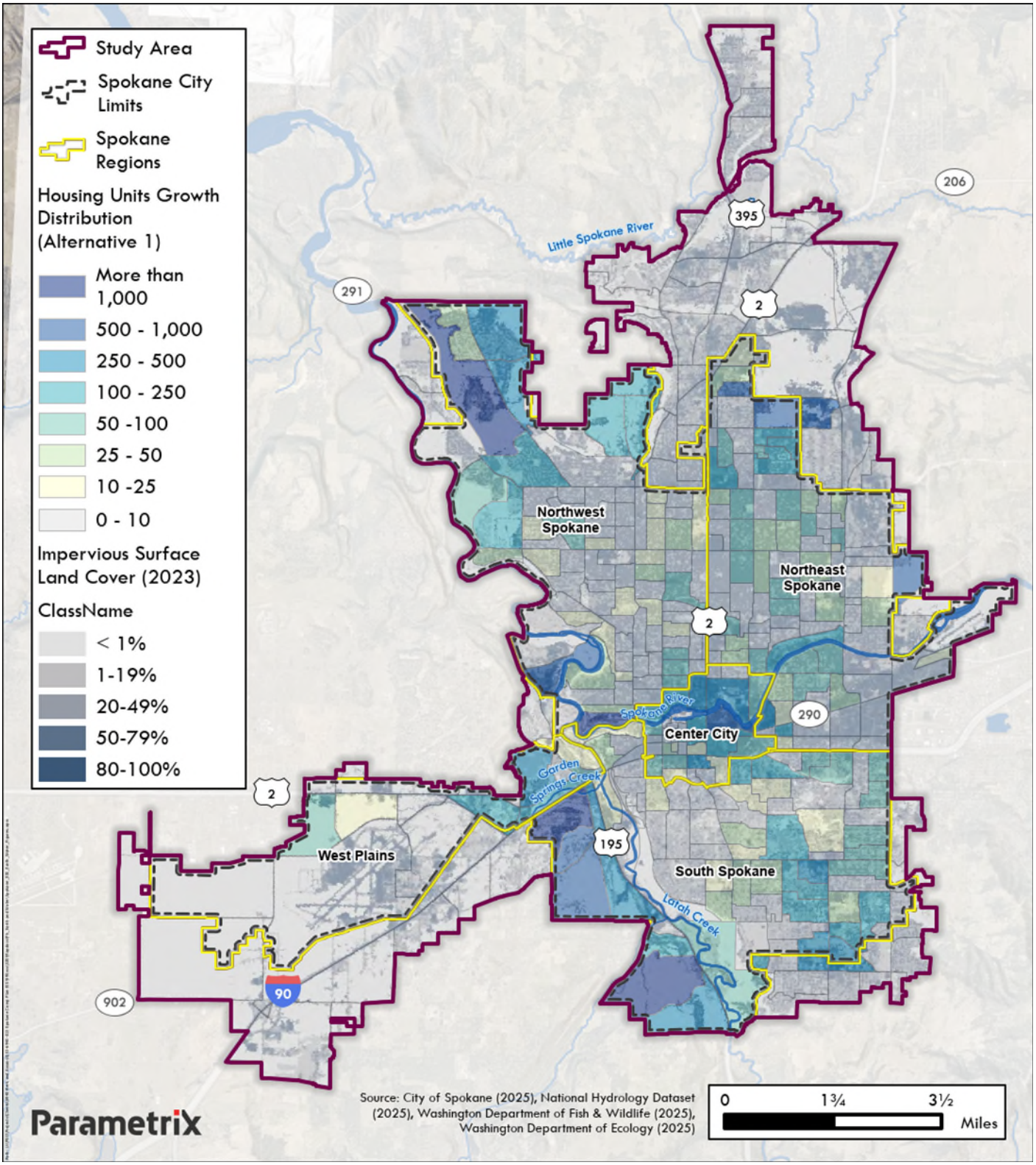
Environmental Impacts

A comparison of the plan alternatives is presented in **Exhibit 3.1-16**. Maps showing the density projections of each alternative against already developed hard surfaces are shown in **Exhibit 3.1-17** through **Exhibit 3.1-19**.

Exhibit 3.1-16. Summary of Impact Indicators

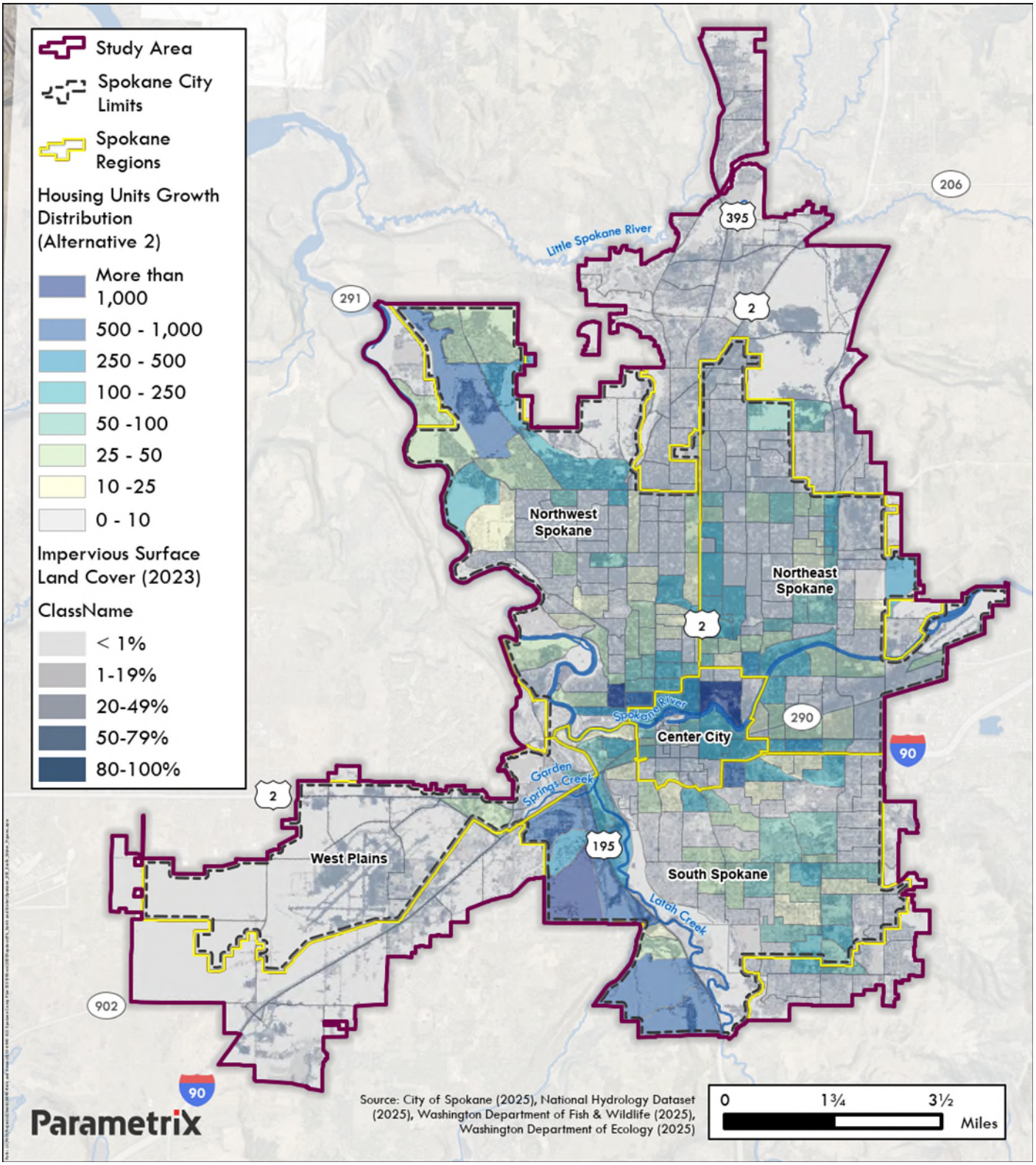
Impact Metric (Weight)	Alternative 1: Stay the Course	Alternative 2: Distributed and Balanced	Alternative 3: Center City and Regional Hubs
Pollution Indicator – *Population* (●●●)	Population target for 2022 to 2046: 25,157 to 50,650. **No difference**	Same as Alternative 1. **No difference**	Same as Alternative 1. **No difference**
Pollution Indicator - *Job Projections* (●)	*Regional (SRTC) Projection* 34,850, about 15,000 jobs above historic trend. **High impact**	*State (ESD) Projection* 24,939, about 5,000 jobs above historic trend. **Medium impact**	*Moderate-High Projection* 38,848, about 19,000 jobs above historic trend **Highest impact**
Pollution Indicator and Flow Increase Indicator - *Density Distribution* (●●●)	High intensity housing in Centers & Corridors and Downtown, with middle housing and single unit allowed in residential areas. Highest increased density focused on currently undeveloped areas. **Highest impacts**	Greater range of housing including low-rise, mid-rise, and mixed-use along frequent transit routes. Meets HB 1491 transit-oriented development. Some increased density focused on currently undeveloped areas. **Medium impacts**	Prioritizes low- and mid-rise housing along bus rapid transit per HB 1491 and in targeted centers. Distributes neighborhood commercial. Least increased density focused on currently undeveloped areas. **Lowest impacts**
Strength of Mitigation Potential – *Code Updates* (●●)	No comprehensive plan or municipal code updates. No new Climate Element per HB 1181. **Weakest mitigation**	Periodic code update, including new Climate Element per HB 1181 and critical area regulation update based on best available science. **Strongest mitigation**	Similar to Alternative 2. **Strongest mitigation**
Overall	**Highest Impacts**	**Medium/Lower Impacts**	**Lowest Impacts**

Exhibit 3.1-17. Existing Hard Surfaces and Forecasted Density Distribution – Alternative 1



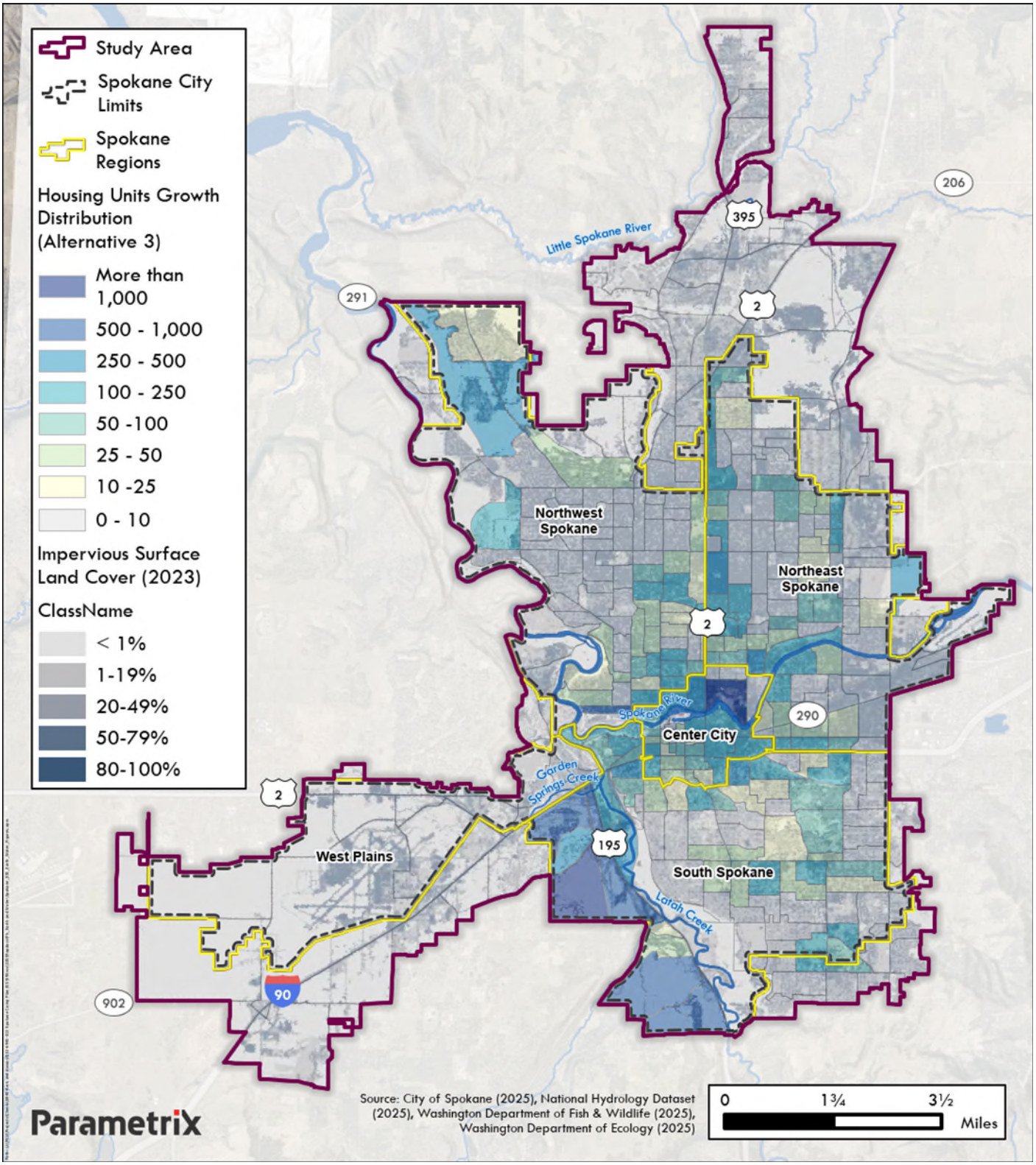
Sources: City of Spokane, 2025; National Hydrology Dataset, 2025; Washington Department of Fish & Wildlife, 2025; and Washington Department of Ecology, 2025.

Exhibit 3.1-18. Existing Hard Surfaces and Forecasted Density Distribution – Alternative 2



Source: City of Spokane, 2025; National Hydrology Dataset, 2025; Washington Department of Fish & Wildlife, 2025; and Washington Department of Ecology, 2025.

Exhibit 3.1-19. Existing Hard Surfaces and Forecasted Density Distribution – Alternative 3



Source: City of Spokane, 2025; National Hydrology Dataset, 2025; Washington Department of Fish & Wildlife, 2025; and Washington Department of Ecology, 2025.

Environmental Justice Implications

As discussed in **Section 3.1.1** and shown in **Exhibit 3.1-15**, highly impacted communities are located in the study area along I-90 and throughout Center City and Northeast Spokane. Redevelopment in these areas associated with the plan alternatives could have both beneficial and detrimental impacts to the population in these areas, as follows:

- Water Quality: In many cases, development permitted in eastern Washington before the 2000's often does not have rainwater runoff management protective of water resources, and development permitted earlier than the 2020's typically does not have stormwater management that captures pollution or controls flow volumes to the maximum extent practicable. Redevelopment of these areas often triggers requirements to upgrade stormwater management to meet current standards. These upgrades can result in a benefit to earth and water resources, and in turn to those living in the surrounding community. Newer stormwater infrastructure can be designed to be more resilient to changes in rainfall frequencies and volumes, thereby lowering the flood risks for the community. In cities like Spokane with some areas that were developed decades ago, redevelopment areas with underserved populations can sometimes help address environmental inequities related to water quality. Among the plan alternatives, each includes changes in development patterns in the highly impacted communities discussed in **Section 3.1.1**, which could result in beneficial retrofits to stormwater management.
- Exposure to Contaminated Sites: Populations living near historically contaminated sites may be at risk from environmental hazard exposure, and disturbance of the ground surface in these areas can sometimes increase the risk. However, larger redevelopment in these areas can trigger site remediation to either more safely contain the contaminants up to current standards or remove the contaminants to a designated hazardous waste disposal site. Therefore, redevelopment can sometimes pose a risk of exposure from contaminated sites or motivate additional clean-up and protection, depending on the scale of the project.
- Exposure to Flooding and Landslides: Where redevelopment would trigger installation of newer stormwater infrastructure as described above, that infrastructure can be designed to be more resilient to changes in rainfall frequencies and volumes, thereby lowering the flood risks for the community. While Alternative 1 retains current plans and regulations, Alternatives 2 and 3 would include a new climate element with resilience and mitigation policies and update critical area regulations.

Area Specific Evaluation

As previously discussed, density projections can serve as an indicator of potential impacts to earth and water resources. A comparison of the density projections of each alternative for each city region is presented in **Exhibit 3.1-20**.

Exhibit 3.1-20. Density Projections as Indicators of Impacts by Spokane Region

	Alternative 1: Stay the Course	Alternative 2: Distributed and Balanced	Alternative 3: Center City and Regional Hubs
Northwest Spokane *(less developed)*	Most density focused in currently undeveloped areas.	Some density focused in currently undeveloped areas.	Least density focused in currently undeveloped areas.
Northeast Spokane *(moderately developed)*	Most density focused in currently undeveloped areas.	Some density focused in currently undeveloped areas.	Least density focused in currently undeveloped areas.
Division Corridor *(highly developed)*	Lowest amount of new density focused in this already developed area.	Moderate amount of new density focused in this already developed area.	Highest amount of new density focused in this already developed area.
Center City *(highly developed)*	Lowest amount of new density focused in this already developed area.	Moderate amount of new density focused in this already developed area.	Highest amount of new density focused in this already developed area.
South Spokane *(less developed)*	Highest amount of new density in this currently less developed area.	Moderate amount of new density in this currently less developed area.	Lower amount of new density in this currently less developed area.
West Plains *(less developed)*	Some new density focused north of the airport.	Lowest amount of new density.	Same as Alternative 2.

3.1.3 Mitigation Measures

Incorporated Plan Features

The following plan features that would be included in Alternatives 2 and 3 would potentially help to minimize impacts to earth and water resources:

- Develop and implement climate resilience and greenhouse gas reduction goals and policies per HB 1181.
- Review and update of critical areas regulations based on best available science.

Regulations and Commitments

Most impacts on earth and water resources from future development projects associated with the plan alternatives would be avoided or minimized through compliance with the applicable regulations such as those listed below.

Federal

- Clean Water Act, 33 United States Code (USC) 1251 et seq., including Sections 401—Water Quality Certification, 402—National Pollutant Discharge Elimination System, and 404—Permits for Dredge or Fill
- Coastal Zone Management Act, 16 USC 1451 et seq.
- Section 14 of the Rivers and Harbors Act of 1899, 33 USC 408 (Section 408)
- National Flood Insurance Act of 1968 and Flood Disaster Protection Act of 1973, 42 USC 4001 et seq.
- Floodplain Management Presidential Executive Order 11988
- Endangered Species Act (ESA) Biological Opinion for the Implementation of the National Flood Insurance Program in the State of Washington (National Marine Fisheries Service 2008)
- Safe Drinking Water Act, 42 USC 300 et seq., Chapter 6A

State & Regional

- Water Quality Standards for Surface Waters, Washington Administrative Code (WAC) 173201A
- Water Quality Standards for Groundwater, WAC 173-200
- Flood Control Management Act, Revised Code of Washington (RCW) 86
- Water Pollution Control Act, RCW 90.48
- Shoreline Management Act, RCW 90.58, WAC 173-26
- National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit (Washington State Department of Ecology [Ecology], 2020)
- National Pollutant Discharge Elimination System (NPDES) Eastern Washington Phase II Municipal Stormwater General Permit (Ecology, 2024a)
- Stormwater Management Manual for Eastern Washington (Ecology Manual) (Ecology, 2024b)
- Washington State Department of Transportation (WSDOT) Highway Runoff Manual (WSDOT, 2019a)
- WSDOT Hydraulics Manual (WSDOT, 2024)
- WSDOT Temporary Erosion and Sediment Control Manual (WSDOT, 2019b)
- Washington State Hydraulic Code, WAC 220-660

City of Spokane

- SMC 17D.060 – Stormwater Facilities
- SMC 17D.090 – Erosion and Sediment Control
- SMC Title 17E – Environmental Standards (which covers aquifer protection, fish and wildlife conservation areas, floodplain management, geologically hazardous areas, shoreline regulations, and wetlands protection)
- Spokane Regional Stormwater Manual (Spokane et. al., 2008)

Other Potential Mitigation Measures

The following mitigation measures are not part of the plan alternatives but are recommended for consideration by the City. These measures would help to further address existing impacts on earth and water resources associated with overall urban development in Spokane.

- Install updated stormwater controls on roadways, which are not likely to be upgraded as part of the parcel redevelopments included in the alternatives.
- Prioritize opportunities to restore critical area buffers.
- Identify, protect, and restore tree canopy – especially in stream and river buffers.
- Avoid adding or expanding roadways through transit and other approaches.
- Continue to follow-up on recommendations of recent environmental code audit (Spokane, 2025) to review Spokane Municipal Code Section 17E.010 Critical Aquifer Recharge Area for additional protections, such as addressing demands on aquifer for uses as temperatures increase.

3.1.4 Significant Unavoidable Adverse Impacts

As discussed in **Section 3.1.3**, development associated with every project alternative would be required to implement BMPs to minimize or avoid potential impacts to earth and water resources. Therefore, no significant unavoidable adverse impacts to earth and water resources are expected from the plan alternatives.

3.2 Air Quality and Greenhouse Gas Emissions

This section addresses existing air quality and greenhouse gas (GHG) emissions within Spokane, explores how the alternatives may influence air quality, and considers implications for public health, particularly focusing on vulnerable populations and overburdened communities. It also provides an overview of regional, state, and federal air quality regulations, including monitoring and permitting programs, and a summary of regional GHG emissions.

Increasing GHG emissions exacerbate air quality issues and contribute directly to climate change. Spokane faces increasing climate hazards, including rising temperatures and extreme heat, wildfires and smoke, heavy precipitation and flooding, drought, and reduced snowpack. Wildfires and smoke have the greatest impact on regional air quality and are increasing in likelihood due to rising temperatures and changing precipitation patterns. The City of Spokane is projected to experience an additional 16 "very high" fire danger days and 11 "extreme" fire danger days by midcentury. By the end of the century, there is an expected 87% chance of climate and fuel conditions within Spokane County being favorable for wildfire in any given year (Hegewisch & Abatzoglou, n.d.). Additionally, Spokane County has received some of the highest wildfire smoke scores in the state, reflecting elevated concentrations of fine particulate matter on days impacted by smoke from regional wildfires as well as those across the western U.S. and Canada (City of Spokane, 2025).

Air quality in Spokane is also impacted by year-round pollution sources. Vehicle emissions—particularly from heavy traffic along the I-90 corridor—residential wood burning, and industrial operations contribute to elevated levels of particulate matter and ground-level ozone, which are the region's primary criteria pollutants of concern. Criteria pollutants refers to six of the most common air pollutants—carbon monoxide, lead, ground-level ozone, particulate matter, and sulfur dioxide (U.S. Environmental Protection Agency, 2025). These pollutants are linked to a myriad of respiratory and cardiovascular problems that pose a serious risk to ecosystem function and human health, especially for vulnerable populations. Neighborhoods along the I-90 corridor, Northeast Spokane, and parts of South Spokane are identified as having high environmental health disparities (City of Spokane, 2025).

Diminished air quality from emissions poses significant risks to Spokane's economic vitality. Wildfire smoke and elevated particulate matter ($PM_{2.5}$ and PM_{10}) will negatively impact and reduce the workforce, increase healthcare costs, and disrupt outdoor recreation and tourism. These effects are particularly burdensome for vulnerable populations, as they exacerbate financial hardships and health conditions.

The following sections assess how the alternatives may influence air quality and GHG emissions in Spokane, discuss consistency with applicable air quality standards and climate policies, and evaluate mitigation measures that reduce potential impacts and prioritize equity and resilience.

Consistent with the above descriptions and based on GHG emissions reduction goals set within Spokane's Municipal Code Section 15.05.020, thresholds of significance utilized in this impact analysis include:

- Achieve 45% reduction in GHG emissions by 2030
- 70% reduction in GHG emissions by 2040
- Net Zero by 2050 (per GHG Inventory Results)

3.2.1 Affected Environment

Spokane is located in eastern Washington and serves as the economic and cultural center of the inland Pacific Northwest. The city is situated in a valley by the Spokane River and is surrounded by rolling hills, dense forestland, and the foothills of the Rocky Mountains to the west. The region's semi-arid climate brings cold, snowy winters and hot, dry summers. Spokane's geography and climate contribute to its air quality challenges, particularly during wildfire season and stagnant weather conditions typical to valleys.

Regulatory Overview for Pollutants of Concern

Air quality is regulated through local, state, and federal policies, standards, and enforcement mechanisms. At the federal level, the Environmental Protection Agency (EPA) enforces the Clean Air Act (CAA), which establishes National Ambient Air Quality Standards (NAAQS) for six criteria pollutants and sets emissions standards for vehicles and fuels, stationary industrial facilities such as refineries and power plants, and hazardous air pollutants.

In Washington State, the Department of Ecology (Ecology) develops and implements plans to ensure compliance with NAAQS, and locally, the Spokane Regional Clean Air Agency (SRCAA) is tasked with air quality monitoring, enforcement, inspections, permitting, and outreach within Spokane County. SRCAA's core air quality regulatory code—Regulation I—incorporates federal and state standards, while including specific requirements for air quality measures within the county. The following sections describe sources, regulatory mechanisms, monitoring and compliance efforts, and public health and environmental impacts for the six criteria pollutants within Spokane. Regional monitoring programs and data for particulate matter and ozone emissions—Spokane's primary pollutants of concern—will be discussed in Data and Methods.

Particulate Matter

Particulate matter is mostly comprised of tiny airborne smoke and dust particles that can lead to respiratory and cardiovascular issues when inhaled. In Spokane County and the city, sources of particulate matter typically include construction sites, paved and unpaved roads, mobile vehicles, residential and non-residential burning, and wildfires (Spokane Regional Clean Air Agency, 2025). SRCAA continuously monitors particulate matter (PM_{10} and $PM_{2.5}$) levels at seven monitoring sites throughout the county and enforces burn bans and dust control measures to prevent exceeding the NAAQS established by the EPA.

Ozone

Ground-level ozone (O_3) is formed when sunlight or heat interacts with chemical reactions between oxides of nitrogen and volatile organic compounds from vehicle emissions, solvents, and industrial processes (EPA, 2025). Ground-level ozone is particularly harmful to children and those with existing respiratory issues. SRCAA and Ecology monitor summer levels of ground-level ozone closely and implement strategies to maintain federal standards through vehicle emissions reduction programs and permitting. Additionally, the EPA regulates ozone-depleting chemicals, including chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs), helping to restore and protect the stratospheric ozone layer (EPA, 2025).

Carbon Monoxide

Carbon monoxide (CO) is a colorless, odorless gas that is released when fossil fuels are burned, with major sources including motor vehicles, heating appliances, and wood burning (EPA, 2025). CO emissions can become particularly elevated during periods of heavy traffic congestion and thermal inversions. Breathing air with a high concentration of CO is very harmful to heart and brain function, as it reduces oxygen levels in the bloodstream. NAAQS for CO sets limits of 35 ppm for 1-hour averages and 9 ppm for 8-hour averages, with no more than one exceedance allowed per year to protect public health. As late as the 1990s, many dense urban areas in Washington state violated these standards. After Washington's urban areas reached attainment status for CO in 2004, Ecology phased out most monitoring programs, including in Spokane. (Washington State Department of Ecology, 2025). SRCAA's permitting and wood stove restrictions, as well as public education campaigns around wood burning and vehicle idling, are strategies used to regulate CO levels in Spokane County, including the city, and ensure ongoing attainment status with EPA's NAAQS.

Nitrogen Dioxide

Nitrogen Dioxide (NO_2) is formed from motor vehicle emissions, industrial combustion, and wood smoke, and can cause harm to respiratory systems and the natural environment. NO_2 levels in Washington have never exceeded the standards set forth by the EPA and are thus not continuously monitored throughout the state. In Spokane County, SRCAA maintains attainment status with NAAQS through regulatory measures like construction permitting, monitoring and inspection, and enforcement.

Sulfur Oxides

Sulfur Oxide (SO_2) is a colorless gas produced by burning fossil fuels containing sulfur, like coal and crude oil. Exposure to SO_2 can impair ecosystem function and cause harm to respiratory systems—particularly for children, older adults, and those with preexisting health conditions. In Washington state, industrial facilities such as fossil fuel power plants, aluminum smelters, oil refineries, pulp mills, and ships and locomotives are major contributors to SO_2 emissions (EPA, 2025).

In 2010, EPA adopted more stringent SO_2 measures, setting the standard at a 1-hour standard of 75 ppb. In response to the update, Ecology evaluated SO_2 ambient levels in all 39 counties in Washington, concluding that all except a small area in Whatcom County met the standard. Since then, continuous SO_2 monitoring has been phased out across most of the state, including in Spokane. SRCAA ensures levels meet NAAQS through regulatory measures like construction permitting, monitoring and inspection, and enforcement.

Lead

The EPA began phasing out lead from motor vehicle gasoline in the 1970s, resulting in a 98% decrease of airborne lead between 1980 and 2014. Lead is a toxic metal that poses serious risks to human health—particularly children—and impairs ecosystem function (EPA, 2025). Due to EPA's regulatory efforts, most ambient lead levels in the U.S. remain well below NAAQS and regular monitoring is no longer required in areas without major lead sources like Spokane County. Major sources of airborne lead emissions typically include metal and ore processing, lead aviation fuel, waste incinerators, utilities, and lead-acid battery manufacturers (EPA, 2025). SRCAA's regulatory efforts include overseeing permitting and inspections of stationary sources that may emit lead on an as-needed basis.

Regional Greenhouse Gas Emissions

In 2025, the City of Spokane developed 2022 GHG emissions inventories for the city's community and government operations. The inventories included Scope 1 emissions, which are direct emissions from sources within the community's geographic boundary, and Scope 2 emissions, which are indirect emissions from purchased electricity, steam, or heating/cooling used by the community or local government. The City also included some Scope 3 emissions—indirect upstream and downstream emissions associated with the production and disposal of goods and services. The details of the emissions inventory boundary include:

- **Communitywide emissions** that occurred within the City of Spokane's geopolitical boundaries across the residential, commercial, municipal, and industrial sectors. Spokane's city boundary covers approximately 69.5 square miles.
- **Local government operations emissions** that resulted from the City's governmental operations, including sources under the City's operational control (City has full authority to introduce and implement operating policies at facilities), regardless of geographic location.

Communitywide emissions totaled 2,283,457 metric tons of carbon dioxide equivalent ($MTCO_2e$) in 2022, while government operations produced 148,058 metric tons of carbon dioxide equivalent ($MTCO_2e$) in 2022 – approximately 6.5% of communitywide emissions (City of Spokane, 2025). Energy use (48%) and transportation (41%) contribute to the majority of GHG emissions across the community and also contribute to criteria air pollutants of primary concern, including particulate matter and ozone (Spokane Regional Clean Air Agency, 2025). Within government operations emissions, solid waste operations were the largest source of emissions (73%) since they include the emissions from the disposal of City and County municipal solid waste. This includes the City's Waste to Energy (WTE)

facility, the North and South Side landfills, and grid electricity and natural gas consumption within facilities used for solid waste operations (City of Spokane, 2025).

Communitywide emissions increased slightly (5%) from 2016 to 2022, while emissions produced by the City of Spokane's government operations decreased by 2% in the same timeframe. The communitywide increase is largely attributable to an increase in population and higher consumption of aviation fuel, natural gas, and refrigerants. Since 2016, natural gas consumption has risen by 30% in the city. The decrease in government operations emissions primarily comes from a reduction in emissions from solid waste operations, electricity consumption, wastewater processes, and employee commuting (City of Spokane, 2025).

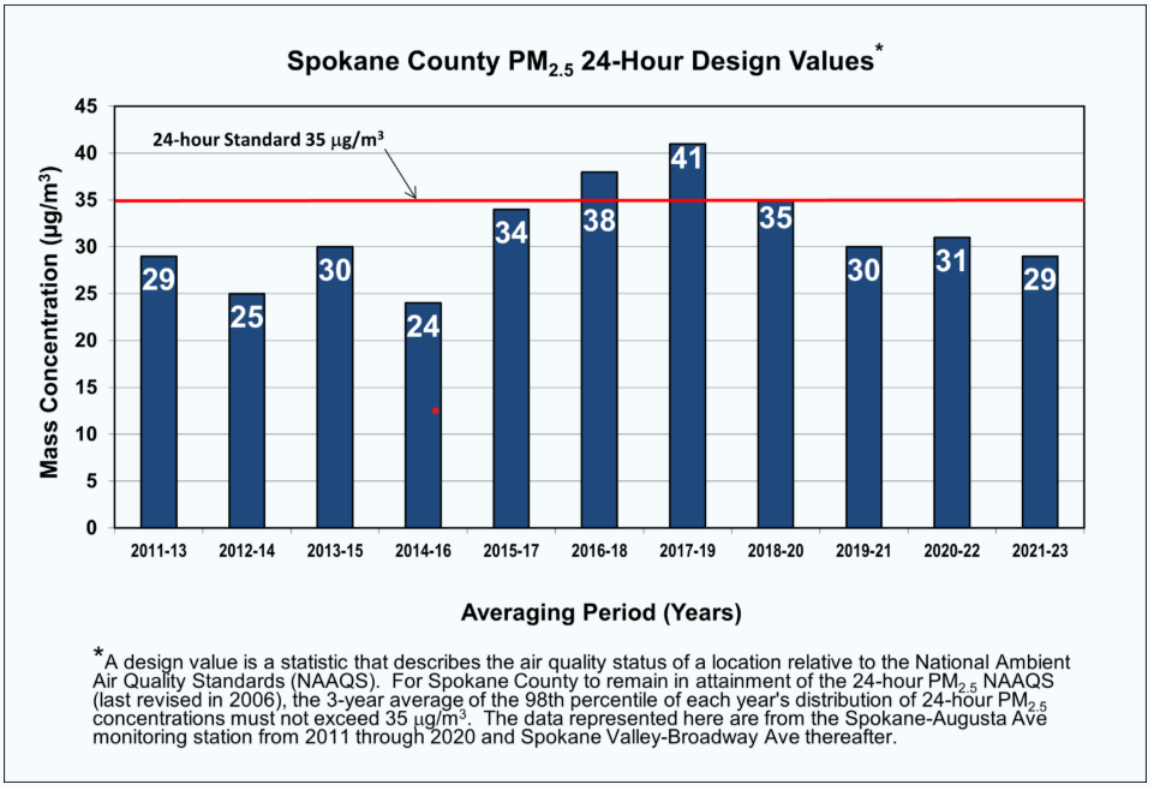
Regional Air Quality Monitoring Data

SRCAA operates seven air quality monitoring stations throughout Spokane County measuring $PM_{2.5}$, PM_{10}, and ozone. The Agency releases monthly air quality reports which show daily Air Quality Index (AQI) values for $PM_{2.5}$, PM_{10}, and ozone, the number of days in each AQI category, and detailed pollutant information per site (Air Quality Index Basics, 2025). SRCAA also releases annual air quality report cards, highlighting AQI trends and year-to-year comparisons and pollution spikes.

In 2024, 63% of the year had "Good" AQI and another 24% had "Moderate" AQI, while just two days were categorized as "Unhealthy for Sensitive Groups." The highest daily AQI of 2024 was 106 on November 9 (Spokane Regional Clean Air Agency, 2025)

In Spokane County, SRCAA continuously monitors three ambient air pollutants of primary concern, including fine and coarse particulate matter ($PM_{2.5}$ and PM_{10}) and ground-level ozone (O_3). Fine particles ($PM_{2.5}$) are 2.5 microns in diameter or less and are formed during the burning process, while PM_{10} are larger, coarse particles measuring 10 microns in diameter or less, such as dust (Spokane Regional Clean Air Agency, 2025). The health-based standard for both $PM_{2.5}$ and PM_{10} is a 24-hour average, measured from midnight to midnight. $PM_{2.5}$ standard is 35 micrograms per cubic meter of air, and PM_{10} is 150 micrograms per cubic meter of air. If the daily average concentration of either pollutant goes above these limits, it may pose a risk to public health—especially for sensitive groups like children, the elderly, and people with heart or lung conditions. **Exhibit 3.2-1** shows Spokane's $PM_{2.5}$ concentrations exceeded the health-based standard from 2016 to 2019 but have since been reduced. The exceedances are linked to a rise in wildfire activity and smoke events, which began increasing around 2015 and peaked in severity during the 2020 and 2021 wildfire seasons.

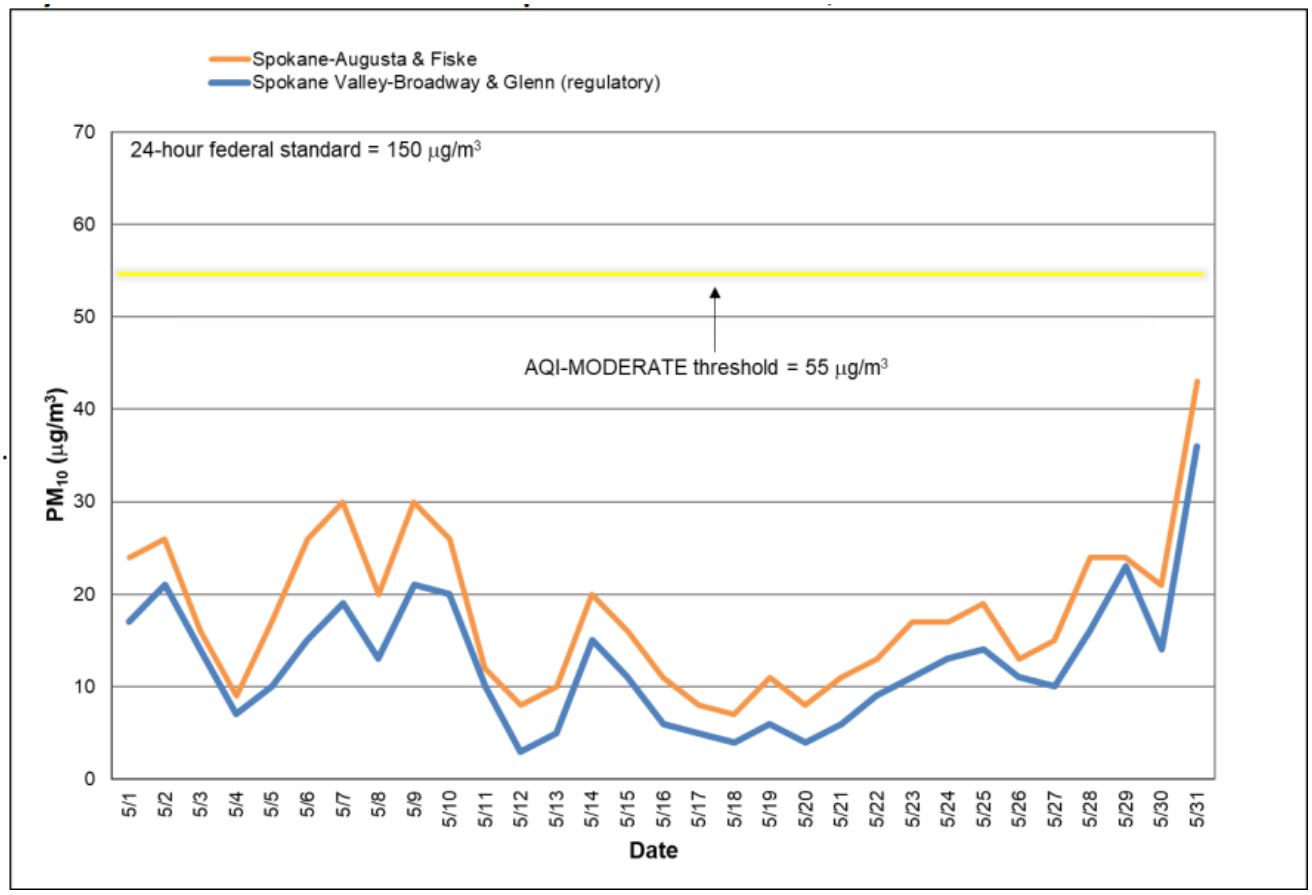
Exhibit 3.2-1. Spokane County $PM_{2.5}$ Trends, 2011-2023



Source: SRCAA Air Pollutants and Trends, 2025.

In Spokane County, PM_{10} concentrations typically fall below EPA standards, as shown in **Exhibit 3.2-2**, which shows the most current data on countywide PM_{10} concentrations in May of 2025.

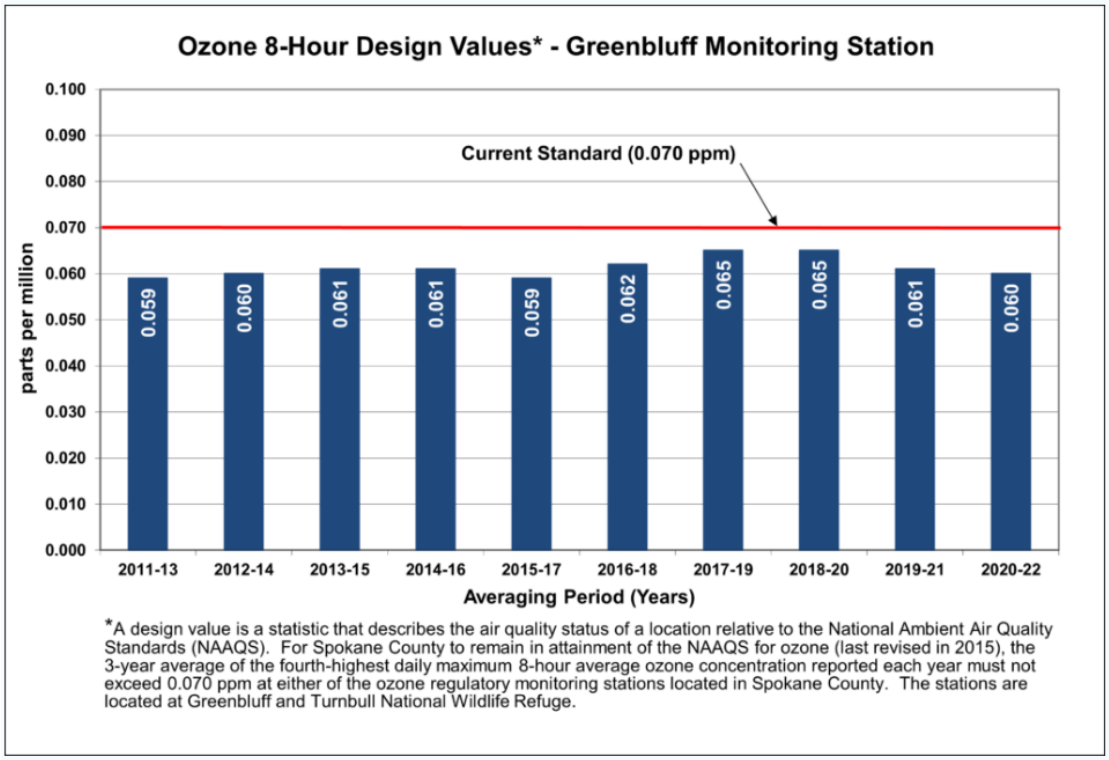
Exhibit 3.2-2. Daily 24-hour Average PM_{10} for All Spokane County Monitoring Stations, May 2025.



Source: (Spokane Regional Clean Air Agency, 2025).

Ozone in the upper atmosphere, known as the stratosphere, protects people, wildlife, and ecosystems from harmful ultraviolet rays, while ozone in the lower atmosphere—even in small concentrations—can have serious health implications. This ground-level ozone becomes a health concern during the hot summer months, when photo-chemicals react with volatile organic compounds, nitrogen oxides, and sunlight and heat. The EPA established the 8-hour health-based standard for ozone at 0.070 ppm in 2015. **Exhibit 3.2-3** shows Spokane County's ozone concentration trends from 2011 to 2022, which consistently remained below 0.070 ppm.

Exhibit 3.2-3. Spokane County Ozone Trends, 2011-2022



Source: S (Spokane Regional Clean Air Agency, 2025).

Air Quality Permitting Requirements

Ecology and SRCAA issue the following permits and programs related to air quality:

- Annual Registration Programs
- Notice of Construction (NOC) Permits
- Air Operating Permits (AOP)
- Burn Permits
- General Order of Approval

Annual Registration Programs

As mandated by Regulation I, SRCAA's annual registration program requires most stationary sources of air pollution to register annually. These sources include auto shops, dry cleaners, gas stations, and small manufacturers. The program ensures ongoing compliance with air quality regulations through annual fees, inspections, emissions reporting, and recordkeeping requirements. It applies to both permitted and non-permitted sources and helps SRCAA track emissions, enforce rules, and maintain regional air quality standards (Spokane Regional Clean Air Agency, 2025).

Notice of Construction (NOC) Permits

SRCAA implements the state Notice of Construction (NOC) rules (Washington State Legislature, 2025), which requires the owner or operator of an air contaminant source to file an application for an NOC approval prior to constructing, installing, establishing, replacing, or modifying air contaminant sources, emissions units, or air pollution control equipment in Spokane County (Spokane Regional Clean Air Agency, 2025).

Air Operating Permits (AOP)

As mandated by the EPA, SRCAA administers the federal Air Operating Permit (AOP) program in Spokane County. Major sources are defined as businesses or facilities with a potential to emit any of the following:

- 100 tons of any criteria pollutant
- 10 tons of any single hazardous air pollutant (HAP) as listed pursuant to subsection 112(b) of the federal Clean Air Act
- 25 tons of all HAPS combined

Burn Permits

Outdoor burning is heavily restricted in Spokane County and burn permits are issued and approved by SRCAA for limited activities and on a case-by-case basis. These permits are available for certain types of natural vegetation disposal, such as agricultural clearing, flood debris clearing, noxious weed abatement, training exercises, or small social events. However, all permit applications must comply with local smoke management and public health standards to receive approval (Spokane Regional Clean Air Agency, 2025)

Prevention of Significant Deterioration (PSD)

The Prevention of Significant Deterioration (PSD) program is a federal permitting process that applies to major new sources or major modifications in areas that meet federal air quality standards, including Spokane County. PSD permits, issued by Ecology, require a detailed air quality analysis and the use of Best Available Control Technology (BACT) to prevent deterioration of existing clean air conditions (Washington State Department of Ecology, 2025).

General Order of Approval

Ecology issues General Order Permits for commercial sources of air pollution including asphalt plants, autobody shops, concrete batch plants, dairy digesters, dry cleaners, rock crushers, water heaters, and small boilers (Washington State Department of Ecology, n.d.). In Spokane County, these state-issued permits are rarely used because SRCAA has jurisdiction and typically requires operators of these commercial sources to obtain NOC permits.

Climate and Air Quality

A combination of natural sources and human activity influences air quality. Cars, trucks, and other fuel-burning equipment are the largest sources of transportation-related emissions, which can cause localized and regional levels of CO, $PM_{2.5}$, PM_{10}, NO_2, and O_3. Spokane County currently meets all federal standards for air quality; however, it remains in attainment for CO and PM_{10} due to past exceedances (Washington State Department of Ecology, 2025). The expansion of roads and highways, such as the new North Spokane Corridor, which is located in one of the most overburdened areas in the city, can lead to increased localized levels of these pollutants, as more traffic and congestion in an area releases pollutants from various vehicle-related processes (EPA, 2014).

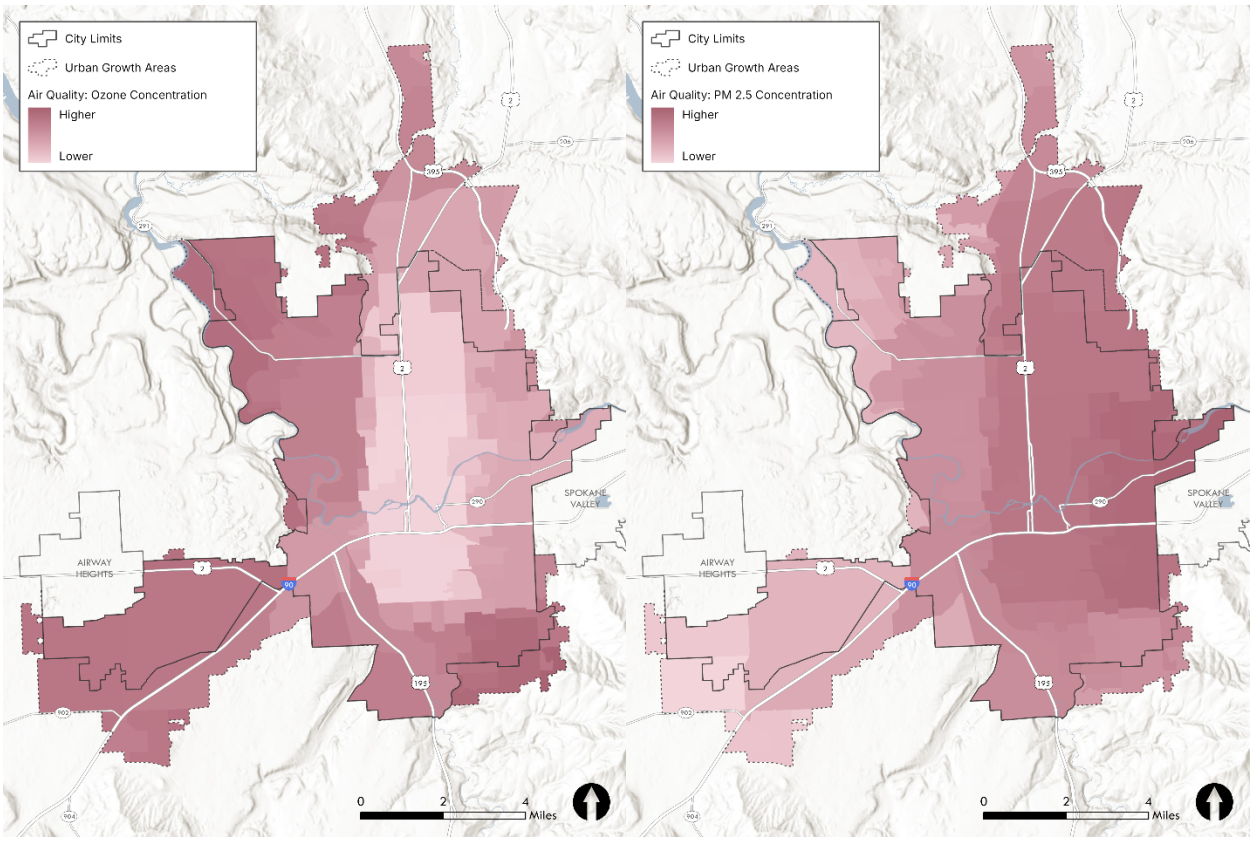
Spokane is situated on the Columbia Plateau in northeastern Washington, near the foothills of the Rocky Mountains to the north and east, and with the Cascade Mountains to the west. The area's climate is semi-arid, characterized by dry, hot summers and cold winters with occasional snowfall. During summer, ground-level ozone, commonly referred to as smog, is more likely to become elevated with high temperatures and sunlight.

Wind patterns in the region vary seasonally, with summer winds typically coming from the north or northwest and winter winds often coming from the south or southwest. Average wind speeds are usually below 10 miles per hour, and stagnant air conditions can cause pollutants to remain in the region longer. Wildfire smoke is also a recurring concern in late summer and early fall, as large fires in the northwestern U.S. and Canada can affect air quality (Spokane Regional Clean Air Agency, 2021), (Spokane Regional Clean Air Agency, 2025).

Aside from wildfire events, poor air quality most often occurs during temperature inversions in the cooler months when a layer of warm air traps colder air and pollutants close to the ground. These inversions can linger for several days, and when stagnant conditions persist, SRCAA may temporarily restrict outdoor burning (Spokane Regional Clean Air Agency, 2023)

Exhibit 3.2-4 shows relative exposures to $PM_{2.5}$ and ozone across Spokane. Average levels of $PM_{2.5}$ exceed the U.S. EPA's recommended level of 9.0 micrograms per cubic meter across nearly all of Spokane, though ozone levels are significantly below the EPA's recommended threshold. As the Spokane region experiences continued growth in population and economic activity, GHG emissions and levels of criteria air pollutants are expected to rise. The increased emissions will amplify climate hazards, such as extreme heat, wildfires, and wildfire smoke, posing serious and widespread risk to public health and safety. While climate and air quality hazards will impact all of Spokane's community members, vulnerable populations and overburdened communities concentrated in neighborhoods along the I-90 corridor, Northeast Spokane, South Hill, and the area where the North Spokane Corridor is currently under development, will continue to be disproportionately impacted.

Exhibit 3.2-4. Relative exposure to ozone (left) and $PM_{2.5}$ (right) in Spokane.



Source: Spokane Climate Vulnerability Index, 2025.

Vulnerable populations in Spokane include children and caregivers, houseless residents, outdoor workers, low-income households, pregnant people, older adults, residents with disabilities, Native American and Tribal communities, communities in the Wildland Urban Interface (WUI), communities of color, and people with chronic health conditions (City of Spokane, 2025). Addressing these disparities is key to achieving climate justice and building a clean, resilient, and equitable Spokane.

Data and Methods

Greenhouse Gas Emissions

Emissions for greenhouse gases (GHGs) were quantified for each alternative, with the methodology detailed below.

The project team collected data from the following sources:

1. U.S. Energy Information Administration
2. Spokane 2022 GHG Inventory
3. Spokane Regional Transportation Council
4. Census American Community Survey

5. EPA GHG Emission Factors Hub

Using data from Spokane's 2022 community GHG inventory, population and household estimates, and employee counts, GHG emissions from energy consumption were estimated for the three land use alternatives.

For commercial and industrial energy use, estimates for alternatives 1, 2, and 3 were developed by calculating electricity and natural gas consumption in Spokane's commercial and industrial sectors in 2022. These totals were divided by the number of employees in 2022 to generate an average energy use per employee. This per-employee energy metric was then applied to the projected employment capacity of each alternative to estimate total energy use. Emission factors for CO_2, CH_4, and N_2O, along with their respective global warming potentials (GWPs), were used to calculate the resulting GHG emissions.

A similar method was used to estimate residential energy-related emissions for each scenario. Housing unit counts from 2022, broken down by housing type (single-unit, multi-unit, and manufactured homes), were combined with regional average household energy consumption data from the U.S. Energy Information Administration to establish differences in energy use by housing type. This differential was used to estimate per-unit energy consumption in Spokane by housing type for both natural gas and electricity. These estimates were applied to the projected number of single-unit and multi-unit housing units under each alternative, and total consumption was multiplied by fuel-specific emission factors and GWPs to estimate GHG emissions for each alternative.

To estimate emissions from transportation, a daily vehicle miles traveled (VMT) model from 2024 and an annualization factor of 320 days were used to estimate annual VMT under each alternative. Vehicle type breakdowns, including motorcycles, passenger vehicles, and light and heavy-duty trucks by fuel type (gasoline and diesel), were derived from the 2022 inventory and applied proportionally to each alternative's estimated VMT. These projected VMTs were then multiplied by vehicle type-specific emission factors and GWPs to calculate total transportation-related emissions for each alternative.

Other Pollutants

While the alternatives are expected to have varying air quality impacts, criteria pollutants such as $PM_{2.5}$, ozone, and NO_x were not quantified and instead were assessed qualitatively. Sources to assess and visualize pollutants in Spokane include:

- Spokane Climate Risk and Vulnerability Assessment
- Spokane Climate Vulnerability Index Map
- Washington Environmental Health Disparities Map

3.2.2 Impacts

Land use changes, including urban development and deforestation, can also impact air quality and climate by altering natural carbon sinks, increasing VMT, and reducing vegetation that helps filter air

pollutants. The following section provides an overview of how air quality might change across the three alternatives based on the results of the air quality analysis.

Impacts Common to All Alternatives

All three proposed alternatives under the EIS must be evaluated through the lens of climate justice, as climate-related air quality issues in Spokane disproportionately affect its most vulnerable and overburdened populations, including Native American, Black, and Latino residents; low-income and houseless individuals; youth and older adults; residents with disabilities or chronic health conditions; outdoor workers; and those living in communities that bear a disproportionate share of environmental hazards and have limited access to resources and decision-making power regarding their environment.

These overburdened populations are more likely to live in areas with high concentrations of airborne pollutants, heat island effect, and have limited access to healthcare facilities, health insurance, clean indoor air, and cooling infrastructure. Systemic barriers, such as financial hardship, housing insecurity, limited English proficiency, physical disabilities, and mental health struggles, can also limit these groups from building resilience to withstand these conditions.

Air Quality Impacts

For all three scenarios, emissions from energy consumption and vehicle transportation will lead to air quality issues and pollution burden throughout the city. This will especially be the base in areas with closer proximity to major roads and highways. Several neighborhoods are already disproportionately exposed to pollutants such as $PM_{2.5}$ and ozone, a pattern that is especially evident in eastern Spokane, including the Hillyard, Lincoln Heights, and Chief Garry Park neighborhoods.

Wildfire and Particulate Matter Exposure

One of Spokane's most pressing climate justice and air quality concerns is the increase in wildfire smoke, which has become a frequent and recurring hazard in the region. Driven by hotter, drier summers and changing forest conditions, wildfire seasons have grown longer and more intense, subjecting local communities to hazardous levels of fine particulate matter ($PM_{2.5}$). Spokane has experienced multiple years with days or even weeks of unhealthy or hazardous air quality, particularly in late summer and early fall. According to the Spokane Climate Impacts and Climate Justice Assessment (BERK Consulting, Inc.; Cascadia Consulting Group, 2025), Spokane County has had some of the highest elevated particulate matter concentrations from wildfires in the state, and this trend is projected to worsen as climate change continues.

Spokane's vulnerable populations are less able to avoid, prepare for, or recover from wildfire and wildfire smoke events. Low-income households, Tribal members, houseless individuals, and those with chronic health conditions are more likely to live in areas with higher $PM_{2.5}$ concentrations and have less access to clean indoor air, healthcare to address impacts from poor air quality, and transportation

to leave the region during smoke events. As wildfires increase in frequency and intensity, disparities in exposure and resilience will continue to grow and compound existing health and climate justice issues.

Geographic Concentrations of Risk

Residents living in Northeast Spokane, South Spokane, and along the I-90 corridor in the West Plains and Center City neighborhoods face elevated health risks associated with impaired air quality and other environmental concerns (City of Spokane, 2025). Many of these residents belong to overburdened groups, including Native American, Black, Latino, low-income, and disabled individuals, as well as seniors and outdoor workers. Residents or workers in these areas face higher health risks due to the proximity of air pollution sources, including major roadways and industry centers, compounding the effects of wildfire smoke in the summer months.

Limited green space and tree canopy in these areas exacerbate heat island effects, while exposure to traffic emissions increases impaired and often hazardous air quality. These conditions are compounded by systemic barriers to healthcare and housing, which leave residents and workers along the I-90 corridor particularly vulnerable to respiratory illness, heat-related health concerns, and other chronic health impacts made worse by climate change.

Spokane's Climate Risk and Vulnerability Assessment (CRVA) compiled geographic information on exposure, sensitivity (health/environmental), and adaptive capacity to create a Climate Vulnerability Index Map for community members and decision-makers to understand which parts of the city are most vulnerable to the impacts of climate change when compared to the city average. This map can also be used to inform which areas of the city are more at-risk of impacts from changes in air quality. The following provides an area-specific evaluation of this data across Spokane:

- *Northwest Spokane:* Overall, Northwest Spokane's Climate Vulnerability Index (CVI) ranges from very low to very high, with very high areas concentrated in the central and northeastern part of the area. Northwest Spokane also has higher exposure rates to $PM_{2.5}$ in its eastern half and CO in its western half. CO in Northwest Spokane is particularly high compared to other areas of the city.
- *Northeast Spokane:* In Northeast Spokane, the CVI also ranges from very low to very high, but most of this area is high or very high, with very high concentrated in the northeastern part. This area also has higher land surface temperatures in the summer compared to Northwest Spokane and South Spokane. $PM_{2.5}$ exposure levels are generally high across Northeast Spokane when compared to the other study areas, and are highest in the eastern part of the area. CO exposure levels are low in the western portion of Northeast Spokane, but higher in the eastern half.
- *Division Corridor:* In the Division Corridor, the CVI ranges from very high to very low, with most areas ranging from moderate to very low. However, the corridor has higher land surface temperatures in the summer when compared to Northeast Spokane and South Spokane. $PM_{2.5}$ exposure is higher along the corridor than in many other parts of the city, while CO is generally low compared to the rest of the city.
- *Center City:* Overall, Center City's CVI is mostly very low, with a small area being low in the southern part and very high in the northeastern part. $PM_{2.5}$ exposure is higher across Center City, while the exposure level for CO is low.

- *South Spokane:* In South Spokane, the CVI is mostly very low, with very high being located around Highway 195 and just south of I-90 in the northeastern part of the area. $PM_{2.5}$ exposure levels range from low to high compared to the rest of Spokane, with the highest levels being in the northeastern part of the city. CO, on the other hand, is highest in the southern and western parts of the area.
- *West Plains:* The CVI in West Plains is very low; however, this area has some of the city's highest land surface temperatures during summer and has high exposure levels of CO.

Although direct environmental and climate impacts of each alternative may vary, these underlying vulnerabilities will persist, and disparities may widen if appropriate considerations are not evaluated and integrated. Climate justice considerations related to air quality and equitable access to healthcare, housing, and resilience-building resources must be at the center of EIS alternatives planning and implementation. Climate justice, equity, and resilience considerations specific to each alternative will be discussed in the following sections.

Greenhouse Gas Emissions Impacts

Despite higher VMT when compared to the 2024 baseline, all alternatives show a net decrease in transportation emissions by 2046. This reduction is primarily driven by statewide policy assumptions, including the 2035 ban on internal combustion engine sales and the 2030 clean-electricity mandate. When modeled with a 15-year vehicle lifespan (full EV Adoption), these policies result in faster paced vehicle turnover and substantial emissions reductions (**Exhibit 3.2-5)**.

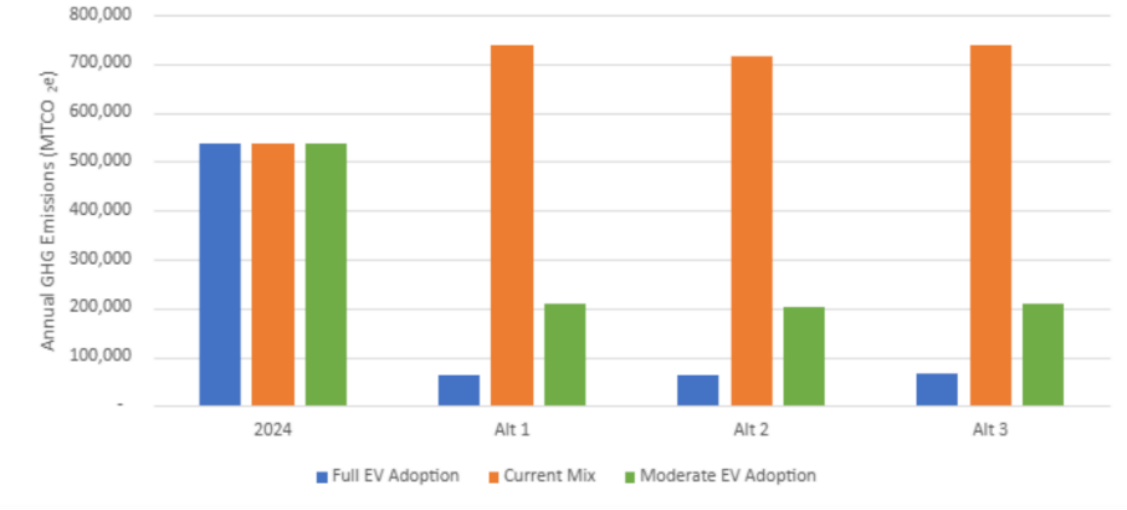
Exhibit 3.2-5. Transportation Emissions Summary (MTCO2e).

ASSUMPTION	2024	2046 ALT 1	2046 ALT 2	2046 ALT 3
Full EV Adoption	535,500	63,971	61,949	64,791
Moderate EV Adoption	535,500	210,139	203,279	210,647
Current Mix	535,500	738,370	714,036	737,853

Source: Cascadia Consulting Group, 2025.

To account for potential differences in EV adoption, two additional scenarios were evaluated: a moderate EV adoption case using a 25-year vehicle lifespan, which may model Spokane's typical vehicle replacement patterns more accurately, and a scenario in which today's internal-combustion vehicle mix remains unchanged **Exhibit 3.2-6**

Exhibit 3.2-6. Emissions from community transportation under three scenarios: one with full EV adoption (assuming a 15-year vehicle lifespan), one in which the current internal-combustion vehicle mix remains constant, and one with a moderate EV adoption rate (assuming a 25- year lifespan).



Source: Cascadia Consulting Group, 2025.

The 2030 clean-electricity mandate significantly reduces community energy emissions across all alternatives when compared to the 2024 baseline. **Exhibit 3.2-7** summarizes projected 2046 energy emissions for each alternative.

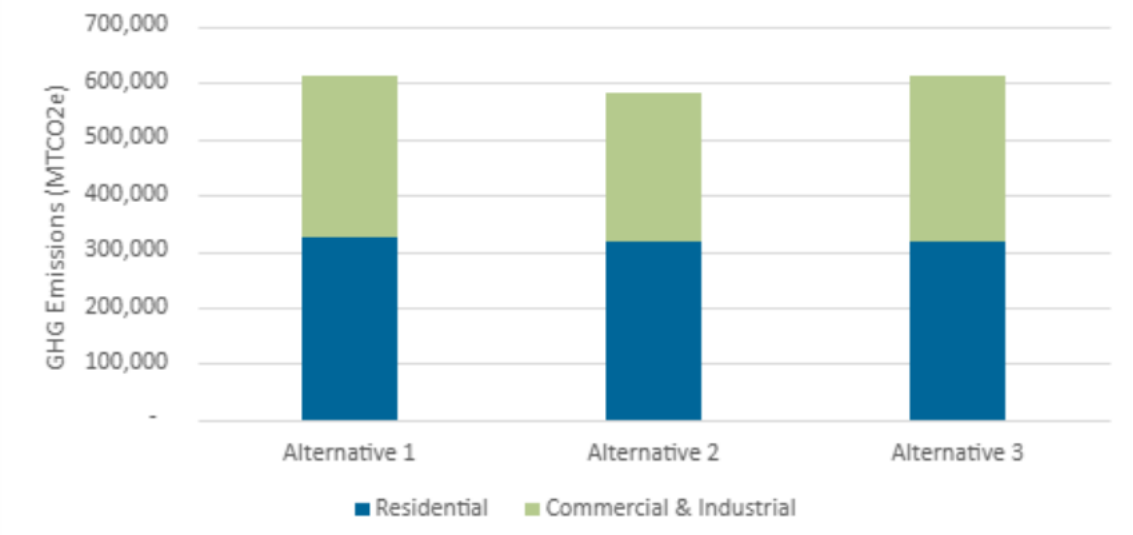
Exhibit 3.2-7. Energy Emissions Summary ($MTCO_2e$).

2046 ALT 1	2046 ALT 2	2046 ALT 3
609,942	582,691	611,011

Source: Cascadia Consulting Group, 2025.

Differences in energy emissions between the three growth alternatives are driven largely by projected changes in residential housing stock and employment capacity (**Exhibit 3.2-8**).

Exhibit 3.2-8. Emissions associated with each alternative, by sector.



Source: Cascadia Consulting Group, 2025.

Alternative 1: No Action, Stay the Course

Alternative 1 produces the highest emissions for both community energy and transportation. Higher projected employment capacity and a lower proportion of multifamily housing lead to elevated energy consumption in 2046.

Transportation emissions are also greatest in this alternative due to the highest projected VMT and the lowest share of walking, biking, and transit trips. This car-dominant pattern reduces mobility for residents without vehicle access and increases housing scarcity due to limited multifamily options.

Alternative 2: Distributed and Balanced

Alternative 2 results in the lowest energy and transportation emissions across all scenarios. Transportation emissions decline due to the lowest VMT and a reduced share of trucks and heavy-duty vehicles.

Energy emissions also decrease, driven by a larger share of multifamily housing and the lowest projected commercial and industrial employment capacity. Compared to Alternative 1, this alternative supports greater transportation choice and expanded multifamily housing options. However, one potential tradeoff is a more competitive job market due to reduced employment growth.

Alternative 3: Center City and Regional Hubs

Alternative 3 results in emissions lower than Alternative 1, but slightly higher emissions than Alternative 2. Energy emissions are influenced by the highest projected employment capacity among

all alternatives, although the emphasis on multifamily housing alleviates overall energy demand relative to Alternative 1.

Transportation emissions are slightly lower than those in Alternative 1 due to marginally reduced VMT, but higher than those in Alternative 2. Overall, Alternative 3 represents a middle ground between the higher-emissions No Action alternative and the lower-emissions Alternative 2 Distributed and Balanced model.

3.2.3 Mitigation Measures

Incorporated Plan Features

The 2017 Comprehensive Plan for the City of Spokane outlines goals and policies to protect the natural environment, including clean air and reducing pollution from transportation (City of Spokane, 2017). Under the action alternatives, the City will update its Comprehensive Plan policies related to land use, transportation, and others that could protect the city from major air emission sources. This update will also include the addition of climate planning, now mandated by the Washington State Growth Management Act, to integrate climate considerations into every aspect of the city's future (City of Spokane, 2025).

Regulations and Commitments

Air Quality

- NAAQS: The EPA enforces the CAA, which establishes the NAAQS for six criteria pollutants and sets emissions standards for vehicles and fuels, stationary industrial facilities, and hazardous air pollutants.
- Washington State: Ecology develops and implements plans to ensure compliance with NAAQS and has established state ambient air quality standards. Washington State has also enacted the Washington Clean Air Act.
- State Implementation Plan: The EPA reviews and approves Washington's State Implementation Plan, which provides tools to restore air quality and meet NAAQS when one or more pollutants are not in compliance.
- SRCAA Regulations: SRCAA's core air quality regulatory code—Regulation I—incorporates federal and state standards, while including specific requirements for air quality measures within the county.
- SRCAA is tasked with air quality monitoring, enforcement inspections, permitting, and outreach with Spokane County.
- Washington State Department of Health also shares air quality data with the public and provides public education on hazards.

Greenhouse Gases & Climate Change

- Washington State: The State has enacted the Climate Commitment Act to cap and reduce statewide GHG emissions with a goal of achieving a 95% reduction by 2050. The State has also established the Clean Energy Transformation Act, which commits the state to emissions-free electricity by 2045. The State's Clean Buildings Performance Standard, Clean Buildings Act, energy codes, and zero-emission vehicle standards will also help the State and Spokane reduce greenhouse gas emissions.
- Spokane's 2021 Sustainability Action Plan: In 2021, the City updated its 2009 Sustainability Action Plan to address environmental and climate-related requirements at the local and State levels. Since the 2009 plan was adopted, the City adopted a goal of achieving 100% renewable electricity by 2030, and the State enacted legislation requiring the City to have 100% renewable electricity by 2045 and to have 30-year GHG reduction targets with an interim stepped approach. The updated plan provides guidance on achieving these requirements while mitigating risks from climate change and investing in strengthening Spokane communities.

Other Potential Mitigation Measures

No significant unavoidable adverse impacts on air quality and GHG emissions are expected; however, the following mitigation strategies can be implemented to address the potential exposure of residents and other sensitive areas of the city to criteria air pollutants.

Transportation-Related Emissions and Pollutants

In 2022, transportation emissions accounted for 41% of the city's communitywide GHG emissions, making it the second largest source. These emissions also significantly contribute to $PM_{2.5}$ and CO levels, and the new North Spokane Corridor could cause higher levels of criteria air pollutants in nearby areas. Actions to reduce emissions and pollutants from transportation include:

- Expanding multi-modal pathways, facilities, and public transit services to encourage residents to walk, bike, roll, or use public transportation and reduce VMT from single-occupancy vehicles.
- Implementing roadway fees, tolls, or congestion pricing to reduce traffic congestion, especially during peak travel times on key road segments.
- Increasing land use mix and density of the city to reduce the need for vehicle ownership and shorten trip distances.
- Supporting electric vehicle or zero emissions vehicle adoption through expanding charging options and providing incentives.

Building-Related Emissions

Energy use was the largest source of emissions in 2022, making up 48% of Spokane's communitywide emissions. Most of these emissions came from using electricity, natural gas, and other fossil fuels in residential, commercial, and industrial buildings. Actions to help reduce building and energy emissions include supporting and incentivizing building owners to switch from fossil fuels to electric options, adopting rooftop solar and battery storage, and improving building efficiency through retrofits.

The City can assist building owners in implementing each of these measures by:

- Strengthening building codes and standards, including requiring high efficiency in new construction, energy performance standards for existing buildings, and phasing out fossil fuels in new construction.
- Offering rebates, low-interest loans, or grants for equipment and retrofits or working with Avista to provide these to building owners.
- Conducting education and outreach to the public to inform them of the benefits of improving building efficiency and going electric or working with Avista on these efforts.
- Offering expanded weatherization assistance programs for low-income households with partner organizations. This could include expanding programs to offer electrification options, solar panels, battery storage, or other opportunities that reduce building emissions and increase energy efficiency.

Additional Potential Mitigation Measures

The City can also implement the following measures to improve air quality for residents:

- Designate truck routes that serve industrial, manufacturing, and commercial areas away from residential areas.
- Protect and enhance tree canopies and natural landscapes and plant more trees near heavy traffic corridors and industrial areas.
- Increase street sweeping across the city and incorporate or improve standards to reduce dust associated with high traffic corridors and construction sites.
- Amend development standards for buildings and air filtering near air pollution sources like freeways.
- Adopt new development and building codes and require or incentivize air filtering and circulation in residences, schools, hospitals, and other sensitive and vulnerable building types or areas.
- Increase education and outreach on the risks associated with air pollutants and how residents can protect themselves.

3.2.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts on air quality and GHG emissions are expected. By implementing mitigation measures, supporting local and state climate initiatives, and through ongoing regulatory changes, the alternatives could lead to lower GHG emissions on a per capita basis compared to current conditions. The alternatives would not hinder statewide, regional, or local efforts to reduce GHG emissions. Although each option would produce GHG emissions from growth and development within the city, focusing development in targeted areas potentially offsets these impacts by preventing development in peripheral regions of the city.

3.3 Plants and Animals

Habitat loss, fragmentation, and degradation create substantial challenges for fish and wildlife populations throughout Washington. In large part, these habitat impacts are associated with the urban and suburban development that will continue to support the state's increasing human population. As urban communities continue to grow, habitat can become more fragmented and less available. This section discusses important fish and wildlife species, vegetated habitats in the City of Spokane and surrounding study area, and the potential impacts of the three Alternatives on these resources.

Thresholds of significance utilized in the impact analysis in this section include:

- An alternative would be inconsistent with or counter to best available science.
- An alternative may have adverse effects to state or federally listed threatened or endangered species or their habitats that could not be sufficiently addressed through avoidance, minimization, or mitigation measures, and could potentially result in an up-listing or jeopardy determination.
- An alternative could have population-level adverse effects to other important non-listed plant or wildlife species (e.g., priority species, migratory birds) that would be perceptible and measurable within the surrounding region.
- An alternative would potentially result in permanent habitat conversion, or loss of habitat connectivity sufficient to compromise overall regional ecosystem function relative to current conditions.

The identified thresholds of significance were used to determine whether the alternatives would have a significant impact on fish, wildlife, and vegetation.

3.3.1 Affected Environment

General Habitat Setting

Terrestrial Habitats

Spokane is located at a transition zone between the Columbia Plateau and Columbia Mountains/Northern Rockies ecoregions (NatureServe Explorer 2025), and thus the vegetated habitats are representative of a transition zone between montane forest and shrubsteppe ecosystems. Ponderosa pine (*Pinus ponderosa*) dominates lowland forests in the study area and surrounding region, with juniper/sage understory in drier zones. Spokane's hills and bluffs are dominated by a mix of Ponderosa pine and Douglas-fir (*Pseudotsuga menziesii*), with bunchgrasses and shrubs dominating the ground layer and understory (Fryer 2016). Patches of shrubsteppe habitat are dispersed throughout the city, with large patches most prevalent in the West Plains area. Shrubsteppe communities are arid ecosystems dominated by drought tolerant shrubs such as rabbitbrush (*Chrysothamnus viscidiflorus*) and sagebrush (*Artemisia* spp.) with interspersed grasses. Shrubsteppe ecosystems are highly biodiverse and provide habitat for species found nowhere else in Washington, such as the Greater sage-grouse (*Centrocercus urophasianus*), sagebrush sparrow (*Artemisiospiza*

nevadensis), and burrowing owl (*Athene cunicularia*). An estimated 80% of historic shrubsteppe has been lost or degraded by development and agriculture since the arrival of non-native settlers (WDFW 2025a). The Washington Department of Fish and Wildlife has developed a mapping tool and strategy identifying xeric (dry) and mesic (wet) shrubsteppe habitats and priorities. There are patches of xeric habitats and some corridors of mesic habitat along streams and rivers identified as "other" than the core habitat which are more degraded but have opportunities for conservation and enhancement. (Washington Shrubsteppe Restoration and Resiliency Initiative, 2024)

Vegetation in the developed urban areas of the city is typical of urban environments, consisting largely of grass lawns, landscape plantings, and streetscape vegetation, including street trees. Parks provide blocks of vegetated open space distributed throughout the city. Tree canopy coverage varies widely among the neighborhoods in Spokane. A 2021 report by Gonzaga University found that tree canopy coverage ranged from 7.8% in the Riverside neighborhood, which spans portions of Center City and Northwest Spokane, to 38.5% in the Manito neighborhood in South Spokane. Average canopy coverage was estimated at 20% citywide (Manthey et. al. 2021). The City of Spokane's Urban Forestry division sponsors a tree planting program called SpoCanopy, which has a goal of achieving 30% forest canopy coverage in every neighborhood in Spokane by 2030 (Spokane Urban Forestry, 2025).

Common noxious weed species in the study area and surrounding region are shown in **Exhibit 3.3-1**. Noxious weeds are invasive plants that have been accidentally or intentionally introduced outside of their native range and are highly destructive to native plant and animal habitat, difficult to control by cultural or chemical practices, and can reduce crop yields, damage recreational sites, lower land values, and poison humans and/or livestock.

Class A noxious weeds are those whose distribution is still limited. Preventing new infestations and eradicating existing infestations is required by state law. Class B noxious weeds are limited to portions of Washington State but may be widespread elsewhere. They are designated for mandatory control in regions where they are not yet widespread. In areas where Class B weeds are already abundant, containment is the primary goal, and control is decided at the local level. Class C noxious weeds are non-native species that are already widespread in Washington and long-term programs of suppression and control are a local option (Washington State Noxious Weed Control Board 2025; Spokane County Noxious Weed Control Board 2025).

Exhibit 3.3-1. Noxious Weeds in the Study Area and Surrounding Region

Common Name	Scientific Name	Class
Flowering Rush	*Butomus umbellatus*	A
Garlic Mustard	*Alliaria petiolata*	A
Goatsrue	*Galega officinalis*	A
Marsh thistle	*Cirsium palustre*	A
Palmer Amaranth	*Amaranthus palmeri*	A
Wild Four O'Clock	*Mirabilis nyctaginea*	A

Common Name	Scientific Name	Class
Brown Knapweed	*Centaurea jacea*	B[1]
Garden Loosestrife	*Lysimachia vulgaris*	B[1]
Herb-Robert	*Geranium robertianum*	B[1]
Hoary Alyssum	*Berteroa incana*	B[1]
Musk Thistle	*Carduus nutans*	B[1]
Myrtle Spurge	*Euphorbia myrsinites*	B[1]
Perennial Pepperweed	*Lepidium latifolium*	B[1]
Policeman's Helmet	*Impatiens glandulifera*	B[1]
Puncturevine	*Tribulus terrestris*	B[1]
Russian Knapweed	*Rhaponticum repens*	B[1]
Saltcedar	*Tamarix ramosissima*	B[1]
Scotch Broom	*Cytisus scoparius*	B[1]
Velvetleaf	*Abutilon theophrasti*	B[1]
Wall Subgenus Hawkweed	*Hieracium (yellow-flowered)*	B[1]
White Bryony	*Bryonia alba*	B[1]
Wild Chervil	*Anthriscus sylvestris*	B[1]
Yellow Starthistle	*Centaurea solstitialis*	B[1]
Blueweed	*Echium vulgare*	B
Common Bugloss	*Anchusa officinalis*	B
Dalmatian Toadflax	*Linaria dalmatica*	B
Orange Hawkweed	*Hieracium aurantiacum*	B
Diffuse Knapweed	*Centaurea diffusa*	B
Spotted Knapweed	*Centaurea stoebe*	B
Kochia	*Bassia scoparia*	B
Leafy Spurge	*Euphorbia virgata*	B
Purple Loosestrife	*Lythrum salicaria*	B
Rush Skeletonweed	*Chondrilla juncea*	B
Scotch Thistle	*Onopordum acanthium*	B
Buffalobur	*Solanum rostratum*	C
Canada Thistle	*Cirsium arvense*	C
Common Barberry	*Berberis vulgaris*	C
Hoary Cress	*Lepidium draba*	C
Oxeye Daisy	*Leucanthemum vulgare*	C

Note: 1 Denotes Class B Designate weeds, which are not yet widespread and therefore mandated for control.
Source: Spokane County Noxious Weed Control Board 2025; Washington State Noxious Weed Control Board 2025.

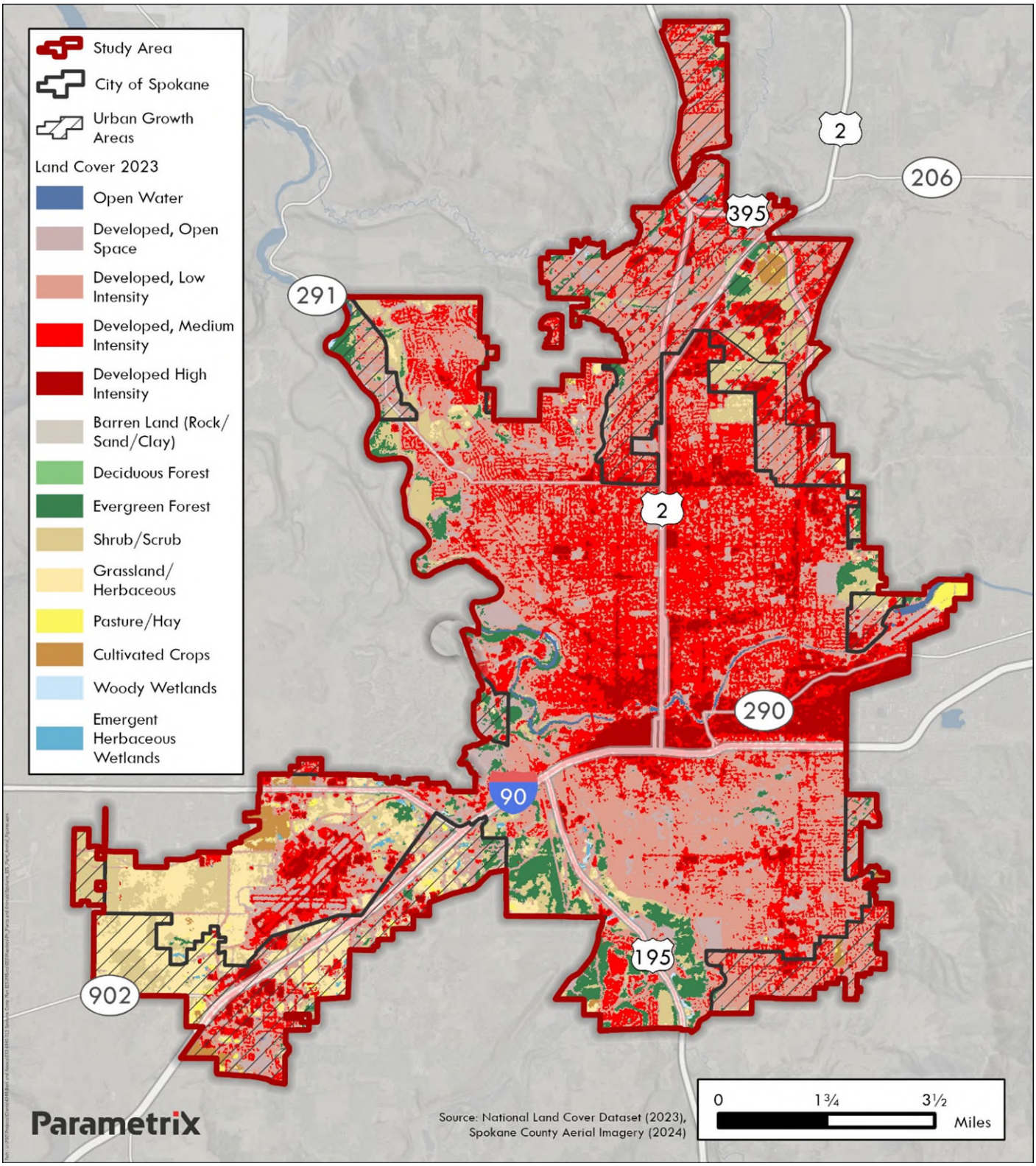
Overall, the land cover types in present-day Spokane are reflective of the human development activities and land conversion that have taken place on the city's landscape over time. Forest clearing and conversion of native grassland for small farms and residences began in what is now Spokane in the late 1800s. Population and related land conversion increased in conjunction with railroad development beginning in 1881. Development of industrial uses along the banks of the Spokane River began in the late 1880s with construction of grist mills, lumber mills and, subsequently, dams for electricity generation. From the mid- to late 20th century, rural areas underwent conversion to suburban land uses as automobile mobility shifted development patterns away from the dense urban core, facilitating more dispersed land use patterns (Spokane Historic Preservation Office 2025). Most of the productive agricultural lands, forested hillsides, and shrubsteppe habitats remaining within the study area are in areas nearer to the outer periphery of Spokane or outside the City's boundary in its UGA (USGS 2023). Land cover types in the study area, and their prevalence on the landscape, are listed in **Exhibit 3.3-2** and shown in **Exhibit 3.3-3**.

Exhibit 3.3-2. Land Cover Types in the Study Area

NLCD Land Cover Type	Acres	Percentage of Total Study Area
Barren Land (Rock/Sand/Clay)	0.22	0.00%
Cultivated Crops	570.89	0.89%
Deciduous Forest	1.11	0.00%
Developed, High Intensity	4796.47	7.49%
Developed, Medium Intensity	18415.43	28.75%
Developed, Low Intensity	21909.67	34.21%
Developed, Open Space	5875.48	9.17%
Emergent Herbaceous Wetlands	99.25	0.15%
Evergreen Forest	3197.03	4.99%
Grassland/Herbaceous	3176.38	4.96%
Open Water	384.88	0.60%
Pasture/Hay	322.02	0.50%
Shrub/Scrub	5174.66	8.08%
Woody Wetlands	122.96	0.19%
TOTAL	**64,046.45**	**100.00%**

Source: USGS 2023.

Exhibit 3.3-3. Land Cover Types in the Study Area



Aquatic and Riparian Habitats

Aquatic habitats in the study area are predominantly associated with the Spokane River and Latah Creek, a major Spokane River tributary and the largest within Spokane city limits. The Little Spokane River, the largest tributary of the Spokane River, forms approximately 1.4 miles of the study area's northern boundary, within the city's Urban Growth Area (UGA) but outside the city limits. A short segment (approximately 950 feet) of Marshall Creek flows through the far southwestern portion of the South Spokane region of the study area, in the Latah Valley neighborhood. Riparian habitats – vegetated communities that represent a transition between aquatic and terrestrial ecosystems - are primarily adjacent to the major water corridors of the Spokane River and Latah Creek. Wetlands in the study area are likewise mostly associated with the Spokane River and Latah Creek systems. Additional isolated wetlands, ponds, and small tributary streams are interspersed throughout the study area, most prevalently in South Spokane (USFWS 2025a).

Riverine and stream habitats within the study area, particularly those associated with the Spokane River and Latah Creek, are affected by the close proximity of urban development, which often directly abuts or encroaches on vegetated riparian buffers and has filled former wetland and floodplain habitat areas. The Spokane River watershed is facing many issues that damage habitat and reduce water quality such as stormwater runoff, loss of wetland habitat, streambank erosion, and historic use of toxic chemicals. The Spokane River has also been substantially affected by the construction of dams, both within and outside the city limits. A total of seven dams have been constructed on the Spokane River, from Post Falls Dam at the outlet of Lake Coeur d'Alene to Little Falls Dam at river mile (RM) 29 (Ecology 2025a). Latah Creek experiences elevated water temperatures, high levels of sediment, and flashy high flow events, all of which harm native fish, largely due to removal of shoreline forests. Other issues in Latah Creek include nonpoint pollution from farming and ranching upstream from Spokane, which contribute contaminants that adversely affect native fish and aquatic organisms. Key contributing sources of contamination also include stormwater runoff and wastewater discharges (Ecology 2020, Ecology 2025b, Spokane Riverkeeper 2025b).

Riparian habitats in the study area are frequently dominated by invasive reed canarygrass (*Phalaris arundinacea*), with scattered scrub-shrub communities of black hawthorn (*Crataegous douglasii*), red-osier dogwood (*Cornus stolonifera*), willows (Salix spp.), and occasional black cottonwoods (*Populus trichocarpa*). The current status of these habitats provides little diversity and value for the wildlife and fisheries. Natural riparian plant associations in the study area, such as those found in the basalt canyon area of Latah Creek, include well-established stands of black cottonwoods, hardstem bulrush (*Scirpus acutus*), quaking aspen (*Populus tremuloides*), mountain alder (*Alnus incana*), and various scrub-shrub communities. (Spokane Conservation District 2012).

Latah Creek is known for its overall poor aquatic and riparian habitat quality. In early 2018, Washington Department of Ecology (Ecology) and Spokane Riverkeeper reached a settlement agreement that requires Ecology to take specific actions, including:

- Complete a full analysis of the creek's health including streamside vegetation and instream conditions within Washington State boundaries.

- Identify, prioritize, and fix water quality problems through focused Best Management Practice (BMP) implementation.
- Monitor the creek's health and track progress of improvements; and
- Develop and implement an education and outreach plan. (Ecology 2025c).

Ongoing efforts are also under way to restore riparian habitat along the Spokane River, led by numerous proponents including Spokane Conservation District, Gonzaga University, the Lands Council, and various other non-governmental organizations. These restoration efforts are often undertaken in partnership with private landowners. Projects have included installation of native riparian plantings, wetland and floodplain restoration, and placement of woody debris to stabilize the riverbank (Inland Northwest Land Conservancy 2016, Spokane Conservation District 2025, Lands Council 2025).

Designated Habitats: Shorelines, Floodplains, Wetlands, and Priority Habitats

Shorelines

Shorelines contain valuable natural resources, provide natural scenic qualities, support important ecological functions and processes, and/or can also present potential hazards to human life and property. Shorelines in Spokane are regulated under Spokane Municipal Code Chapter 17E.060, Shoreline Regulations, with the purpose of avoiding impacts to these areas from alteration wherever feasible and reasonable. Designated shorelines of the state are limited to the Spokane River and Latah Creek. Development within 200 feet of the ordinary high water mark along these streams is heavily restricted and allowed only as authorized according to the Spokane Shoreline Master Program. Shorelines in the study area are shown in **Exhibit 3.3-4** below.

Wetlands

Mapped wetlands in the study area are shown in **Exhibit 3.3-4** The majority of wetlands in the study area are associated with the Spokane River and Latah Creek. Additionally, isolated wetland areas exist in scattered locations throughout the study area, mostly in the South Spokane and West Plains study areas. All development and uses are generally prohibited from wetlands and wetland buffers, except as authorized by federal, state, and local regulations. In general, limitations on allowable impacts and the required widths of wetland buffers are directly related to the habitat quality and the critical importance of the wetland resource – for example, if it is directly associated with a Shoreline of the State and/or fish-bearing streams - and the integrity of ecological function provided. Wetlands in the City of Spokane are regulated under SMC 17E.070.

Floodplains

Floodplains provide benefits to functioning natural systems, including fish and wildlife habitat protection, enhanced biological productivity, natural flood storage and erosion control, surface water quality maintenance, and groundwater recharge (FEMA 2024). Most floodplain resources in the study

area are concentrated along the Spokane River and Latah Creek, often co-occurring with riparian and wetland ecosystems in these areas. Relatively small and interspersed areas of regulated floodplains are distributed in small areas in South Spokane (WDFW 2025c; WDNR 2025; FEMA 2025). Floodplains in Spokane are regulated under SMC Chapter 17E.030. Mapped floodplains in the City of Spokane are shown in **Exhibit 3.3-4**. See **Section 3.1 Earth, Water Quality, and Water Resources,** for additional discussion of floodplains.

Priority Habitats

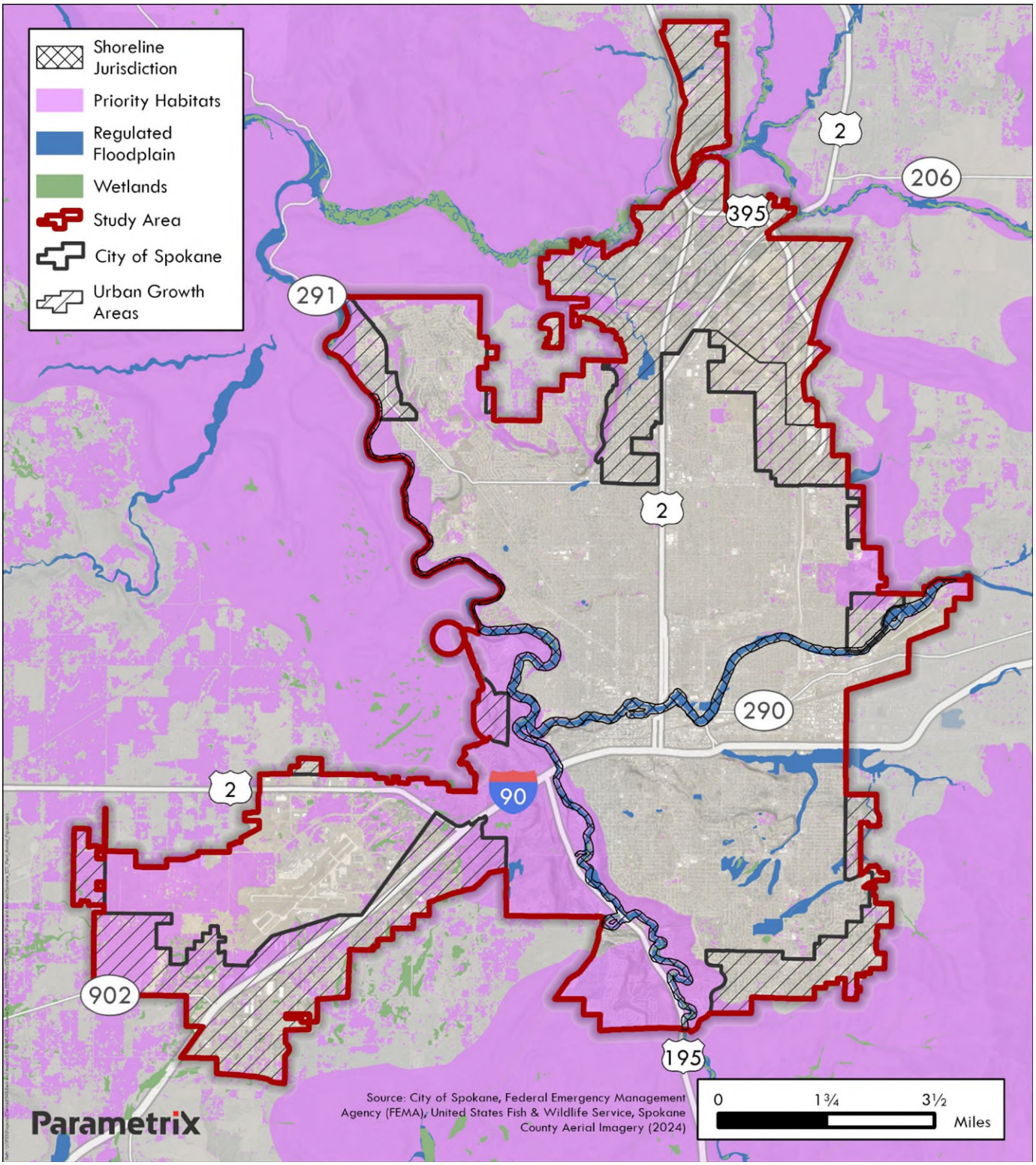
Priority habitats are identified by the Washington Department of Fish and Wildlife (WDFW) as habitat types or elements with unique or significant value to one or more species, for which special conservation measures should be taken (WDFW 2025b). A priority habitat may consist of a unique vegetation type like shrubsteppe, a dominant plant species, or a specific habitat feature (e.g., cliffs). In general, priority habitats with greater importance to fish or wildlife have one or more of these characteristics (WDFW 2023):

- Habitat areas that are larger generally support greater biodiversity and ecosystem function than areas that are smaller, because they can support sensitive species, species that require large areas, and more resilient wildlife populations.
- Habitat areas with more structural complexity (e.g., multiple canopy layers, snags, geologically diverse) provide a greater diversity of habitat types and support higher species diversity than areas with less complexity.
- Areas that contain different native habitat types contiguous with one another provide for greater ecosystem function and biodiversity than isolated habitats, because they support species that use multiple habitat types for different activities or life cycle stages (especially aquatic habitats associated with terrestrial habitats),
- Habitat areas that are connected, as opposed to areas that are isolated, provide better pathways for wildlife to move between biodiversity areas. This movement supports critical ecosystem functions including plant and animal movement to access food, water, shelter, and breeding habitat; adaptation to climate change; and gene flow.
- Habitat areas that have maintained continuity in historical ecosystem processes (e.g., disturbance regimes, successional patterns) generally exhibit greater ecosystem function and habitat complexity, and better support the long-term health of wildlife populations, than areas lacking such processes.

The study area has one large block of identified priority habitats extending along the west side of the City of Spokane from the southern boundary of the Latah/Hangman neighborhood in South Spokane, through the eastern portion of the West Plains, and along the Spokane River corridor on the western boundary of Northwest Spokane. Priority habitats throughout this area are largely identified as northwest white-tailed Deer and mule deer winter range. Intermittent patches of shrub-steppe habitat are also interspersed throughout this larger contiguous block of priority habitat. The Latah Creek and Spokane River corridors are identified as biodiversity areas and corridors. Biodiversity areas and corridors consist of relatively undisturbed and unbroken tracts of vegetated habitat connecting fish

and wildlife populations. Other concentrations of priority habitat include Biodiversity Areas and Corridors associated with the Five Mile Prairie area on the northern fringe of Northwest Spokane, a block of priority habitat in the Hilyard neighborhood of Northeast Spokane identified as shrubsteppe habitat and biodiversity areas and corridors, and a relatively large contiguous area of shrubsteppe habitat in the western portion of the West Plains region (WDFW 2025c; WDNR 2025). Mapped priority habitats in the study area are shown in **Exhibit 3.3-4**.

Exhibit 3.3-4. Natural Resource Designations in the City of Spokane



Locally Specific Habitat Conditions

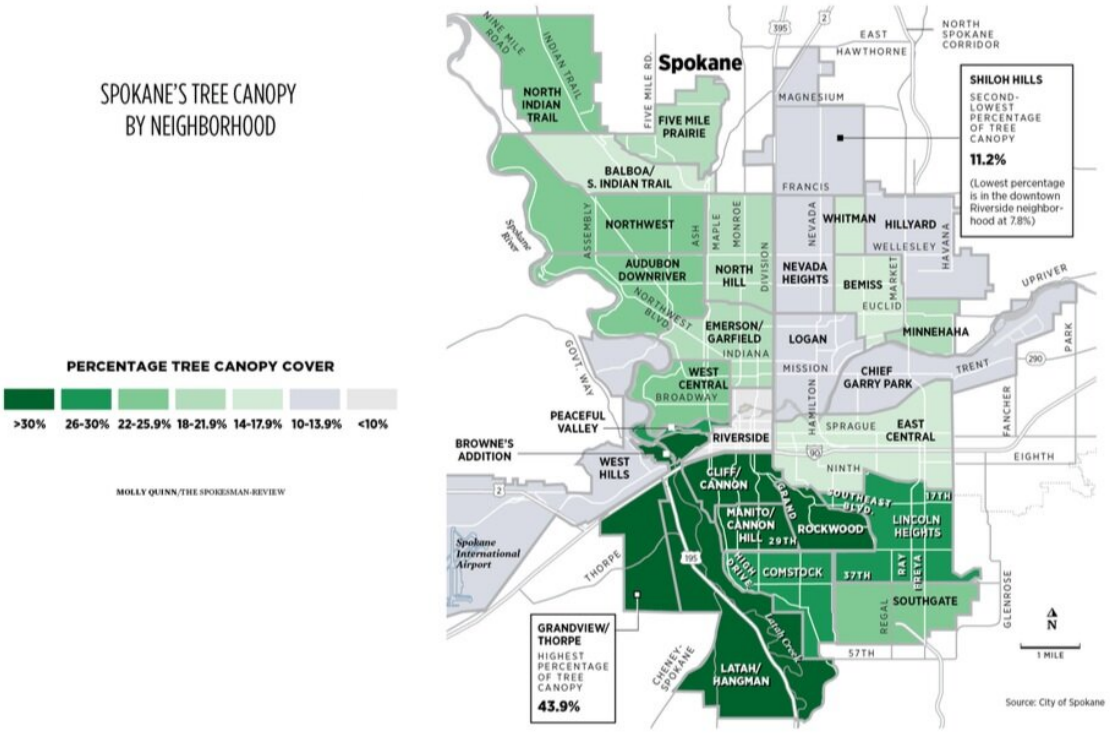
Northwest Spokane

The Spokane River forms the western boundary of most of the Northwest Spokane area. As a result, priority habitat areas, floodplains, and wetlands associated with the river extend along the west side of this region from the West Central neighborhood in the south to the northern boundary of the Northwest study area in the north. Small remnant patches of shrubsteppe of one acre or less in size are scattered throughout this region of the study area. Larger areas of shrubsteppe exist near the northern boundary of the city in the North Indian Trail and Balboa/South Indian Trail neighborhoods. Identified biodiversity areas and corridors exist in the Balboa/South Indian Trail and Five Mile Prairie neighborhoods (WDFW 2025c). Land cover types in Northwest Spokane are classified primarily as "developed, high intensity" and "developed, medium intensity" in the eastern and southern portions of the region closer to the Division Corridor and Center City. Land cover classifications transition to a higher proportion of "developed, low intensity" and "developed, open space" in the western and northern portions of this region, with patches of evergreen forest and scrub-shrub classifications along the western and northwestern perimeter (USGS 2023). Spokane City Council District 3, which is largely coterminous with Northwest Spokane, was found to have overall tree canopy coverage of 20.8%, roughly matching the City average. (Manthey et. al. 2021). See **Exhibit 3.3-5**.

Northeast Spokane

The Spokane River passes through the southern portion of the Northeast Spokane region, forming the northern boundary of the Chief Garry Park neighborhood. There are few areas of priority habitat in Northeast Spokane, with the exception of the Hillyard neighborhood and areas adjacent to the Spokane River. No mapped waters, wetlands, or floodplains exist in Northeast Spokane, aside from those associated with the river. Land cover in this region of the study area is predominantly classified as "developed, medium intensity" interspersed with "developed, low intensity." Concentrations of "developed, high intensity" land cover types are located along the SR 290 corridor and along E Francis Avenue as it approaches the Division Corridor. Open space areas, along with small areas classified as "scrub/shrub," "pasture/hay," and "evergreen forest" are confined to the northern and eastern periphery of Northeast Spokane (USGS 2023). Spokane City Council District 1, which is largely coterminous with Northeast Spokane and has a high population with social vulnerability, was found to have the lowest overall tree canopy coverage of the city's three council districts, at 13.9% (Manthey et. al. 2021). See **Exhibit 3.3-5**.

Exhibit 3.3-5. Tree Canopy Cover by Neighborhood in the City of Spokane



Source: (The Lands Council, 2023)

Division Corridor

The Division Corridor extends northward from Center City, straddling the boundary between Northeast and Northwest Spokane along a major arterial corridor. The landscape is characterized primarily by low-rise urban commercial development and large paved areas. Land cover along the Division Corridor is classified predominantly as "developed, high-intensity" in the south. North of Center City and extending to its northern boundary, land cover in the Division Corridor consists of "developed, high intensity" along N Division Street, with a blend of "developed, medium intensity" and "developed, low intensity" land cover types at distances further than 500 feet from N Division Street (USGS 2023). Shoreline areas and floodplains associated with the Spokane River are present at the southern end of the Division Corridor where it overlaps with Center City; no waters or wetlands are present elsewhere in the corridor. Four small areas of remnant shrubsteppe habitat, each less than a half-acre, are identified west of N Division Street in the northern half of the corridor (WDFW 2025c). Tree canopy coverage along the Division Corridor approximates that of Northeast Spokane, with lower percentages of canopy cover at the southern end of the corridor (Manthey et. al. 2021). See **Exhibit 3.3-5**.

Center City

Center City is heavily developed, with low vegetative cover and low percentages of tree canopy cover compared to other study areas (USGS 2023; Manthey et. al. 2021). See **Exhibit 3.3-5**. Designated shoreline areas and FEMA regulated floodplains are present adjacent to the Spokane River. Land cover types in the Center City are predominantly classified as "developed, high Intensity" and secondarily as "developed, medium intensity." Areas classified as "developed, low intensity" and "developed, open space" exist along the Spokane River and near the Center City's southern periphery (USGS 2023).

South Spokane

The South Spokane region contains the largest area of priority habitats among the six identified study areas of the city. Priority habitats are most heavily concentrated in the western portions of South Spokane, in the Latah/Hangman and Grandview/Thorpe neighborhoods. All of the shoreline areas, floodplains, and wetlands associated with Latah Creek are located within the boundaries of the Latah/Hangman neighborhood (WDFW 2025c; USFWS 2025a). Land cover in most of South Spokane outside of the Latah/Hangman and Grandview/Thorpe neighborhoods is classified as "developed, low intensity" and "developed, open space." Areas of relatively denser development along major roadway corridors in the Southgate, Lincoln Heights, and Comstock neighborhoods are classified as "developed, medium intensity" and "developed, high density" (USGS 2023). Large portions of the land cover in the Latah/Hangman and Grandview/Thorpe neighborhoods are classified as scrub/shrub or evergreen forest. Areas classified as "developed, medium intensity" and "developed, low intensity" are present along the US 195 corridor. Together with the West Plains region, the South Spokane region makes up Spokane City Council District 2, which was found to have the highest overall tree canopy coverage of the city's three council districts, at 24.9% (Manthey et. al. 2021). See **Exhibit 3.3-5**.

West Plains

The West Plains region contains substantial areas of mapped shrubsteppe habitat and mule deer and white-tailed deer winter range. Numerous palustrine emergent wetlands are scattered throughout the eastern and southern portions of this region. Land cover in the areas surrounding Spokane International Airport and along US 2 is classified as a mixture of "developed, high intensity" and "developed, medium intensity." The remainder of this region is largely classified as scrub/shrub or grassland/herbaceous, with interspersed areas of cultivated crops, pasture, developed open space, and evergreen forest (USGS 2023). Together with the South Spokane region, the West Plains region makes up Spokane City Council District 2, which was found to have the highest overall tree canopy coverage of the city's three council districts, at 24.9% (Manthey et. al. 2021). See **Exhibit 3.3-5**.

Fish and Wildlife

General Wildlife

Wooded areas and other urban vegetated habitats in the City of Spokane support a wide variety of mammals, birds, reptiles, and amphibians. Common mammals within the study area include small rodents such as chipmunks and squirrels; larger rodents including porcupines and marmots; moles, shrews, rabbits, raccoons, skunks, and various species of bat. Wetlands and riparian areas support semi-aquatic mammals such as muskrat (*Ondatra zibethicus*), beaver (*Castor canadensis*), and river otter (*Lontra canadensis*). Larger mammals including mule deer (*Odocoileus hemionus hemionus*), northwest white-tailed deer (*Odocoileus virginianus ochrourus*), and coyote (*Canis latrans*) can also be found within the study area. (WDFW 2025d; Burke Museum 2025a). These species tolerate varying levels of urban development as long as some habitat and connecting migration corridors remain undisturbed. The number and diversity of species declines in direct relation to the size of habitat patches and their level of isolation from other natural areas (Hennings and Soll 2010; Krausman et. al. 2008).

Numerous species of migratory songbirds rely on the habitat provided by larger wooded areas in Spokane. Smaller wooded tracts, parks, and open spaces may provide temporary foraging or migratory habitat within the urban areas of Spokane. Portions of the Spokane River and Latah Creek drainages provide suitable habitat for aquatic bird species including mallards (*Anas platyrhynchos*), American wigeons (*Mareca americana*), green-winged teal (*Anas carolinensis*), blue-winged teal (*Spatula discors*) common merganser (*Mergus merganser*) and other ducks; as well as other birds associated with aquatic environments such as great blue heron (*Ardea herodias*), and Canada goose (*Branta canadensis*). Species such as savannah sparrow (*Passerculus sandwichensis*), ruffed grouse (*Bonasa umbellus*), Ring-necked Pheasant (*Phasianus colchicus*), and wild turkey (*Meleagris gallopavo*) can be found in shrubsteppe areas of the West Plains (eBird.org 2025).

Common reptiles and amphibians found in the study area include various native lizard species such as common sagebrush lizard (*Sceloporus graciosus*), western fence lizard (*Sceloporus occidentalis*), northern alligator lizard (*Elgaria coerulea*), western toad (*Anaxyrus boreas*), and several species of salamanders (*Ambystoma* spp.) (Burke Museum 2025b). Invasive American bullfrog (*Lithobates catesbeianus*) has become established throughout wet lowland environments of eastern Washington, including in the various ponds and wetlands throughout South Spokane (Mulvany 2019)

Fish and Aquatic Species

Streams in the study area that are recorded as fish-bearing include the Spokane River, Latah Creek, Little Spokane River, and Marshall Creek (SWIFD 2025; Visit Spokane 2025). While Latah Creek and Marshall Creek are not currently recorded to have any fish species present, the Spokane River and Little Spokane River provide habitat for a number of native and non-native fish species. Native fish documented in the Spokane River system within the study area include Westslope cutthroat trout (*Oncorhynchus lewisi*), Redband trout (*Oncorhynchus mykiss gairdneri*), Rainbow trout (*Oncorhynchus mykiss*), mountain whitefish *(Prosopium williamsoni)*, and kokanee salmon (*Oncorhynchus nerka*). Bull trout (*Salvelinus confluentus*), anadromous salmon, and steelhead were once native to the Spokane

River system, but since the construction of Grand Coulee Dam on the Columbia River downstream from its confluence with the Spokane River, there is no passage for these species (WSDOT 2019). Non-native fish in the study area include game fish species such as smallmouth bass (*Micropterus dolomieu*), largemouth bass (*Micropterus salmoides*), brown trout (*Salmo trutta*), and eastern brook trout (*Salvelinus fontinalis*) (WDFW 2025e; SWIFD 2025; Spokane Water Trail 2025). The non-native northern pike (*Esox Lucius*) is classified as a prohibited aquatic invasive species in Washington. It has spread to several water bodies within the state, including the Spokane River. Northern pike represents a potential for substantial ecological and economic damage. It can live for over 20 years, grows to more than 45 pounds, produces a large number of young, and can both prey upon native salmonid species as well as outcompete them for food and habitat (WDFW 2025f).

Federal and State Threatened, Endangered, and Special Status Species

An inventory of federally-listed fish and wildlife species protected under the ESA (16 USC 1531 et seq., as amended in 1998), was compiled using the U.S. Fish and Wildlife Service (USFWS) IPaC Information for Planning and Consultation database (USFWS 2025a). See **Exhibit 3.3-6**. State-listed protected species were identified using the Washington Natural Heritage Program data explorer and WDFW Priority Habitats and Species webmap tools (WDFW 2025c; WDNR 2025). The study area falls outside the jurisdictional limits of all ESA-listed species administered by NOAA Fisheries (NMFS); therefore, these species are not considered.

Federally listed species and Washington priority species that are potentially present in the study area and surrounding vicinity are shown in Exhibit 3.3-6 (USFWS 2025b; WDFW 2025c; WDNR 2025). No critical habitat has been designated or proposed for any federally listed or proposed species within the study area at this time.

Exhibit 3.3-6. Summary of Federally Listed Species and Washington Priority Species in the Study Area

Priority Species	Scientific Name	Federal Status	State Status
Monarch butterfly	*Danaus plexippus*	Proposed Threatened	Candidate
Suckley's cuckoo bumble bee	*Bombus suckleyi*	Proposed Endangered	N/A
Spalding's catchfly (herbaceous perennial)	*Silene spaldingii*	Threatened	N/A
Westslope Cutthroat Trout	*Oncorhynchus clarki lewisi*	N/A	N/A
Rainbow Trout	*Oncorhynchus mykiss*	N/A	N/A
Redband trout	*Oncorhynchus mykiss gairdneri*	N/A	N/A

Priority Species	Scientific Name	Federal Status	State Status
Big Brown Bat	*Eptesicus fuscus*	N/A	Endangered
Townsend's Big-eared Bat	*Corynorhinus townsendii*	N/A	Candidate
Western toad	*Anaxyrus boreas*	N/A	Candidate
Black-backed woodpecker	*Picoides arcticus*	N/A	Candidate
Burrowing owl	*Athene cunicularia*	N/A	Candidate
California floater mussel (mollusc)	*Anodonta californiensis*	N/A	Candidate
Shortface lanx (mollusc)	*Fisherola nuttalli*	N/A	Candidate

Sources: USFWS 2025b; WDFW 2025c; WDNR 2025.
N/A = not applicable

Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act

Migratory birds are federally protected under the Migratory Bird Treaty Act (MBTA), which makes it illegal to take, possess, import, export, transport, sell, purchase, barter, or offer for sale any migratory bird or eagle, or the parts, nests, or eggs of such a bird except under the terms of a valid federal permit from USFWS (16 USC 703 et seq). Bald and golden eagles, though no longer on Washington's state endangered species list, continue to be protected under the Bald and Golden Eagle Protection Act which prohibits take (defined to include pursuing, shooting, poisoning, wounding, killing, capturing, trapping, collecting, molesting, or disturbing bald or golden eagles), possession, and commerce of these species (16 USC 668-668ds). Like most of Washington, Spokane is within the Pacific Flyway, a migratory bird route that extends from Alaska to South America. Migratory birds are known to travel through Spokane and its vicinity and use various habitats including agricultural habitats, interspersed undeveloped uplands, open space, forests and wetland areas, and aquatic habitats associated with streams and ponds. The primary nesting season for most migratory birds in Washington is from April 1 to July 1 (USDA-FSA 2018). Bald and golden eagles are both known to be present in the region surrounding Spokane, although golden eagles are encountered much more rarely. These species are likely nesting and breeding between the months of January through August (USFWS 2025b). Development activities within up to 660 feet of bald eagle nests, roost sites, or foraging areas—or up to 0.5 miles for activities producing loud intermittent noises—is required to comply with federal guidelines for bald eagle management (USFWS 2007).

3.3.2 Impacts

Impacts Common to All Alternatives

Population and employment growth, and therefore new development, would continue into the future under all alternatives. All of the alternatives would provide opportunities for development within currently vegetated areas; thereby, all have the potential to impact wildlife and fish habitats, including tree canopy, open space, riparian areas, wetlands, and streams. Site development and redevelopment would have long-term effects on vegetation by physically removing trees, shrubs, and non-woody plants. Land development would also result in short-term construction activities. Ground clearing would expose soils and sediments that could be mobilized in stormwater runoff and impact nearby aquatic habitats. Spills of fuels and fluids from construction vehicles and equipment could also potentially result in mobilization of contaminants to surface water bodies and impacts to fish and aquatic wildlife. Construction activities would create noise impacts that could cause short-term behavioral disturbance to terrestrial wildlife.

Development activities can result in fragmentation of wildlife habitat and reduction of wildlife habitat connectivity, quality, and function, resulting in adverse long-term impacts. Conversion of forest, open space, and agricultural lands to urban-scale development would permanently remove vegetated habitat, increase impervious surfaces, and facilitate increased generation of pollutants that could reach aquatic habitats. Tree removal and reduction in tree canopy cover, in particular, would result in the loss of benefits such as terrestrial wildlife and migratory bird habitat, soil and slope stabilization, and the maintenance of lower ground surface and stream temperatures. Additionally, vegetation removal and ground disturbance would provide opportunities for establishment of non-native and invasive plants, which tend to establish quickly and colonize areas where soils have been disturbed.

Development of vacant or larger low density properties under all alternatives would lead to habitat loss and reduced connectivity that would further reduce biodiversity. Increases in impervious surface could also adversely impact aquatic habitat quality by increasing peak flows, reducing low flows, introducing pollutants, increasing water temperatures, and reducing the amount of shade. Development may also result in conversion of wetlands or degradation of floodplain or riparian habitat, adversely affecting habitats that support fish and aquatic wildlife. The potential to affect habitat varies among the alternatives, because the footprint of the concentrated development areas varies by alternative, but general nature of the impacts would be similar among all alternatives.

Environmental Justice Considerations

As discussed in the City's Climate Risk and Vulnerability Assessment, areas with disadvantaged populations tend to have less tree canopy cover than other areas. For these reasons, alternatives with a higher likelihood of contributing to canopy cover loss in areas with a combination of disadvantaged populations and low canopy cover would have an elevated risk of adverse effects on disadvantaged populations. Conversely, changes that allow lower-cost housing options in areas that are currently designated for low density development could allow more overburdened populations to live in areas

with higher canopy cover and access to large parks. The planting of trees in rights of way and on public lands, where appropriate and managed for fire risk, along with policies that prioritize the protection, maintenance, and expansion of tree canopy in residential and mixed-use areas where tree canopy is currently low, could provide benefit to overburdened populations.

Alternative 1: No Action, Stay the Course

The overall character of potential impacts to plants and animals under Alternative 1 would be consistent with the impacts common to all alternatives discussed above. Spokane's future growth under Alternative 1 is focused in the existing concentrated growth areas in downtown Spokane and regional centers and corridors, which are generally highly developed. Development of residential-zoned areas outside of the Center City would continue along current patterns at current densities. Development would continue to be largely focused in developed areas that are already characterized by large areas of impervious surfaces and relatively low vegetation cover. This would moderate the potential for new development in more heavily vegetated or less intensively developed areas, and thus minimize the potential for substantial impacts to fish, wildlife, and vegetated habitats. Continued residential development at existing densities outside of Center City could result in additional loss of vegetative cover in these areas compared to Alternatives 2 and 3, however. Without the additional density benefits associated with greater amounts of infill and transit-oriented development, some currently undeveloped areas surrounding residential areas that function as greenspace may be eliminated as more single-unit homes are needed to accommodate growth. Continued clearing of vegetation, particularly tree canopy, associated with residential development in these areas would contribute to loss and fragmentation of wildlife habitat.

Among the three alternatives, Alternative 1 would concentrate the least amount of new housing in Center City and the Division Corridor, foregoing opportunities to create increased density in these currently developed areas. Alternative 1 would result in the greatest projected increase of housing units in the far northwest Spokane neighborhoods of North Indian Trail and Balboa/South Indian Trail. These neighborhoods contain substantial pockets of priority habitat, including shrubsteppe and biodiversity areas and corridors, along with wetlands, floodplains, and shoreline areas associated with the Spokane River. Alternative 1 could also potentially create greater development or human-use pressure on habitats in the Hillyard neighborhood of Northeast Spokane compared to the other alternatives. Alternative 1 would result in a slightly greater increase in the number of housing units in the eastern portion of the Hillyard neighborhood than Alternatives 2 and 3 would; however, the housing in Alternative 1 is predominately single-unit dwellings, whereas under Alternatives 2 and 3 it would consist mostly of multi-unit development.

Alternative 1 would also concentrate additional housing and population in the Grandview/Thorpe and Latah/Hangman neighborhoods of South Spokane. These neighborhoods are currently characterized by relatively larger areas of undeveloped or less-densely developed land and large pockets of priority habitat. While increased residential development would potentially increase development pressures on these areas under Alternative 1, Alternatives 2 and 3 would focus a similar amount of additional housing development in Grandview/Thorpe and Latah/Hangman. As a result, there would be no

meaningful difference among the three alternatives in the potential amount of development pressure on habitats in this area of the city.

Overall, Alternative 1 would have adverse effects on plants and animals resulting from increased development. However, existing federal, state, and local regulations would be expected to moderate potential adverse effects. Additionally, existing riparian habitat and tree planting programs would continue to improve watershed and tree canopy coverage conditions throughout urban Spokane. Alternative 1 would not be inconsistent with best available science, would not have irreversible adverse effects on federally or state-listed threatened or endangered species, and would not have adverse population-level effects on important non-listed species. Alternative 1 would result in permanent habitat conversion, but due to existing federal, state, and local regulations it would not be sufficient to compromise overall regional ecosystem function. As a result, **Alternative 1 would result in less than significant impacts to plants and animals.**

Alternative 2: Distributed and Balanced

The overall character of potential impacts to plants and animals under Alternative 2 would be consistent with the impacts common to all alternatives discussed above. Spokane's future growth under Alternative 2 is focused on creating greater housing and job intensity along frequent transit routes and prioritizing a greater geographic balance of jobs and housing. Alternative 2 would result in the most widespread distribution of new housing units and jobs within Spokane; however, it would accomplish this in part by intensifying mixed-uses along high-use transit corridors, including in Downtown and along Division and other frequent transit routes. Existing centers of development in South Spokane would become linked by intensified development along the arterial corridors between them. The addition of mixed-use zoning to arterials in Northwest and Northeast Spokane would provide opportunities to increase density in these currently developed areas.

Similar to Alternative 1, Alternative 2 would concentrate additional housing and population in Grandview/Thorpe and Hillyard, which could create additional development and/or human use pressures on priority habitats in these areas. However, Alternative 2 would concentrate a substantially greater amount of housing and job growth in Center City and the Division Corridor, which Alternative 1 would not. Concentrating housing, jobs, and transit within denser, more centrally situated, and accessible areas could potentially defuse some of the development pressures in less developed areas at the city's periphery.

Similar to Alternative 1, Alternative 2 would have adverse effects on plants and animals resulting from increased development. While Alternative 2 would be focused on creating increased density in already-developed areas, it would have the most diffuse and widespread footprint among the alternatives. As with Alternative 1, existing regulations and ongoing restoration and tree-planting efforts would be expected to moderate potential adverse effects. Alternative 2 would not be inconsistent with best available science, would not have irreversible adverse effects on federally or state-listed threatened or endangered species, and would not have adverse population-level effects on important non-listed species. Alternative 2 would likely result in permanent habitat conversion. However, due to its focus on increasing existing urban density, the existing framework of federal,

state, and local regulations (including the current update to the City's Comprehensive Plan) and ongoing local habitat restoration initiatives, Alternative 2 would not have effects that would be sufficient to compromise overall regional ecosystem function. As a result, **Alternative 2 would result in less than significant impacts to plants and animals.**

Alternative 3: Center City and Regional Hubs

The overall character of potential impacts to plants and animals under Alternative 3 would be consistent with the impacts common to all alternatives discussed above. Alternative 3 plans for more concentrated development in Center City, the Division Corridor, and a limited number of regional centers such as Hillyard, Southgate, and West Plains than do Alternative 1 or Alternative 2. Growth would also be focused along a limited number of corridors where substantial transit investments are planned or under way. Alternative 3 would thus have a less geographically diffuse overall approach to housing and job growth than Alternative 2 but would focus more intensively on a smaller subset of the same areas. The effects of Alternative 3 on plants and animals would therefore be negligibly different from Alternative 2. As a consequence, while it would have adverse effects, **Alternative 3 would result in less than significant impacts to plants and animals.**

3.3.3 Mitigation Measures

Impacts to terrestrial habitats and associated impacts to wildlife can be minimized via implementation of existing federal and state laws and local regulations such as the Environmental Standards provisions in Title 17E of the SMC and the Spokane SMP.

Impacts to aquatic habitats and fish can be minimized by complying with regulations for all development projects. This includes, but is not limited to, adhering to shoreline area, wetland, and stream buffer requirements, complying with allowable in-water work windows, meeting stormwater requirements, and complying with state and federal requirements regarding fish, wildlife, and waters of the state and U.S.

Because none of the alternatives would result in significant adverse impacts, adherence to existing fish and wildlife habitat protection regulations would be expected to sufficiently minimize adverse development impacts under all of the alternatives. No additional mitigation would be necessary for adverse impacts, and as a result, none is proposed. Measures that would contribute to ongoing protection of fish, wildlife, and habitat resources, as well as additional measures that could help to improve on current conditions, are discussed below.

Incorporated Plan Features

The following plan features that would be included in Alternatives 2 and 3 would potentially help to minimize impacts to plants and animals:

- Develop and implement climate resilience and greenhouse gas reduction goals and policies per HB 1181. Strategies of the City's June 2025 Climate Risk and Vulnerability Assessment that could be incorporated into the element include:
  - Restore shoreline habitats.
  - Expand and manage the City of Spokane's tree canopy.
  - Consider a "One Health" approach to habitat management (optimize the health of people, animals, and the environment).
  - Establish development regulations that incorporate best practices for:
    - Reducing the risk of wildfires, which are a prevalent hazard in the region.
    - Mitigating the impacts of extreme heat and flooding.
- Review and update critical areas regulations based on best available science. A preliminary review as part of the City's June 2025 Climate Policy Audit provided the following strengths and opportunities in the City's Critical Areas Regulations:
  - Section 17E.020 Fish and Wildlife Conservation Areas (FWCA): Spokane has fairly large riparian buffers that align well with 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 FWCA: 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 restrictions for areas within the mapped 500-year floodplain.

Regulations and Commitments

A substantial body of regulation exists to direct the management and protection of fish, wildlife, and habitat within the State of Washington. Key federal, state, and local laws affecting fish, wildlife, and vegetation are summarized below.

Federal

Endangered Species Act

The Endangered Species Act (ESA) provides a framework to conserve and protect endangered and threatened species and their habitats from a project's effects. Section 7 of the ESA requires federal agencies to ensure that their actions do not jeopardize the existence of listed species or destroy or adversely modify designated critical habitat. The ESA is administered by the U.S. Fish and Wildlife

Service (USFWS) and National Oceanic and Atmospheric Administration National Marine Fisheries Service (NOAA Fisheries, or NMFS).

Migratory Bird Treaty Act of 1918

The act protects migratory birds, making it illegal to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under a valid federal permit from USFWS.

Bald and Golden Eagle Protection Act of 1940

This act prohibits "take," including parts (including feathers), nests, or eggs of bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*).

Section 404 of the Clean Water Act

Section 404 of the Clean Water Act requires authorization from the Secretary of the Army, acting through the Corps of Engineers (USACE), for the discharge of dredged or fill material into all waters of the United States, including wetlands. A permit is required whether the work is permanent or temporary.

State of Washington

Growth Management Act of 1990 (RCW 36.70A)

Washington's Growth Management Act (GMA) states that in drafting comprehensive plans, jurisdictions should "protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water" and "conserve fish and wildlife habitat" (RCW 36.70A.020). The GMA requires that critical areas be designated, and development regulations be adopted, to protect such areas.

Shoreline Management Act (RCW 90.58, WAC 173-18-100, and Chapter 173-22 WAC) of 1972

The Shoreline Management Act (SMA) requires protection for shoreline natural resources, including "… the land and its vegetation and wildlife, and the waters of the state and their aquatic life … to ensure no net loss of ecological function." Its goal is "to prevent the inherent harm in an uncoordinated and piecemeal development of the state's shorelines." The SMA requires jurisdictions with river, lake, or marine shorelines to develop and implement Shoreline Master Programs (SMPs).

Chapter 220-610 WAC, State and Protected Species

Chapter 220-610 WAC identifies the federal ESA-listed species that are present in Washington and establishes closed seasons and penalties for take of federally listed fish species. It also identifies and classifies native wildlife species needing protection in Washington; defines the listing, management, recovery, and delisting processes; and establishes rules for bald eagle management in Washington.

Chapter 77.12.020 RCW, Wildlife to be classified

This chapter empowers the director of the Washington Fish and Wildlife Commission to determine whether a species should be managed by WDFW, and to classify it as protected, endangered, or as deleterious exotic wildlife that is dangerous to the environment or wildlife of the state.

Chapter 77.55 RCW, Construction Projects in State Waters

This law requires a Hydraulic Project Approval (HPA) from the Washington Department of Fish and Wildlife WDFW for any work that uses, diverts, obstructs, or changes the natural flow or bed of any fresh water or saltwater of the state of Washington, including wetlands.

Chapter 220-640 WAC, Invasive/Non-native Species; Chapter 17.10 RCW, Noxious Weeds—Control Boards; and Chapter 16-750 WAC State Noxious Weed List and Schedule of Monetary Penalties:

These chapters establish the framework for regulating and controlling noxious weeds in the state of Washington and designate the list of noxious weeds that pose threats statewide and regionally.

Washington State Wildlife Action Plan

The Washington State Wildlife Action Plan (SWAP) is a roadmap for conserving the state's fish and wildlife and the natural habitats on which they depend. The SWAP is currently undergoing a comprehensive revision.

City of Spokane

Environmental Standards (Spokane Municipal Code Title 17E)

Spokane Municipal Code (SMC) Title 17E, Environmental Standards, provides for the protection of identified Critical Areas within the City of Spokane. Key chapters of SMC Title 17E include provisions regulating Critical Aquifer Recharge Areas (17E.010), Fish and Wildlife Conservation Areas (areas with which priority species are associated, including important terrestrial and aquatic habitats as well as riparian areas and buffers) (17E.020), Floodplains (17E.030), Geologically Hazardous Areas (17E.040), and Wetlands (17E.070). Title 17E also includes provisions governing the administration of the city's SEPA regulations and the implementation of its Shoreline regulations.

Shoreline Master Program

The Washington Shoreline Management Act requires local governments to prepare locally relevant policies and regulations for managing shorelines though their Stormwater Master Program (SMP). The City of Spokane's SMP governs the preservation, restoration, use, modifications, and development of shoreline areas, which include the areas inside city limits that are located within 200 feet of the Spokane River and Latah Creek. Both the Spokane River and Latah Creek are designated as Shorelines of Statewide Significance, a special category of shorelines where statewide interests take priority and specific uses are preferred. The City of Spokane SMP defines how these streams' shoreline areas will

be managed and includes goals, policies, development standards, and use regulations. The objectives of the City of Spokane SMP are to improve environmental quality, enhance public access and recreational opportunities, plan and coordinate development, raise development standards, and ensure that Spokane's greatest natural assets are carefully managed for the enjoyment of future generations. Spokane Municipal Code Chapter 17E.060, Shoreline Regulations, establishes the city's authority for administration and implementation of the SMP.

Other Potential Mitigation Measures

Although none of the alternatives would result in significant adverse impacts to plants and animals, and existing protections would preclude the need for additional mitigation, opportunities exist to build on existing plans and regulations. Potential strategies to enhance vegetated habitat areas and benefit fish and wildlife populations, beyond the protections afforded by existing plans and regulations and the plan features of the City's Comprehensive Plan Update, could include such measures as those discussed below.

The City could increase program resources or incentives for the SpoCanopy program, which has a goal for every neighborhood in Spokane to have 30% canopy cover by 2030.

The City could consider opportunities to develop additional incentive programs, and allocate increased program resources, for habitat conservation and restoration,

To address patches and corridors of shrubsteppe habitat, the City could consider conservation strategies that address the State's Washington Shrubsteppe Restoration and Resiliency Initiative Long-Term Strategy for xeric and mesic habitat, including incentive programs (Washington Shrubsteppe Restoration and Resiliency Initiative, 2024).

The City could consider opportunities to identify and acquire undeveloped land in key areas to designate for parks and natural lands. **Section 3.8** in this document discusses current park levels of service, and the levels identified by the 2022 Parks and Natural Lands Master Plan as needed to meet current and future City needs. **Exhibit 3.8-18** in this document shows future parks and natural lands needs throughout the City. The City could prioritize acquiring undeveloped lands adjacent to existing parks and natural areas, as well as undeveloped lands with limited development potential. The City could also work with developers to identify strategies and incentives to incorporate vegetated open space and wildlife corridors into new developments where feasible.

The City could address the following in future code amendments to strengthen resilience:

- Incorporate adaptive management into 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 code language to the critical areas regulations that is similar to provisions contained in the shoreline regulations for limiting clearing and minimizing soil disturbance.

3.3.4 Significant Unavoidable Adverse Impacts

All of the alternatives would result in unavoidable adverse impacts such as permanent conversion of forested areas and vegetated open space to developed space, decreased wildlife habitat connectivity, and additional stormwater runoff to aquatic habitats from increased impervious surfaces. However, because much of the population and employment growth anticipated under the alternatives would take place in currently developed areas, and because of existing and anticipated regulations, these effects would be moderated below the level of significance. While impacts would overall be adverse under all of the alternatives, no significant unavoidable adverse impacts are expected to result from any of the alternatives.

3.4 Land Use Patterns and Urban Form

This section discusses the City of Spokane's land use and urban form, addressing land use patterns, planned land use and zoning, and changes to the scale and type of land use and building forms with the alternatives. Thresholds of significance utilized in this impact analysis include:

- **Land use compatibility:** Changes in use type between adjacent areas and any likely incompatibility. Land use incompatibility could be related to health and safety (such as noise levels), activity levels at various times of day/night, or conflicting movement patterns.
- **Urban form compatibility:** Changes in building form, scale, massing, or spatial organization between adjacent areas and any likely incompatibility. Urban form incompatibility may involve abrupt transitions in building height or bulk, inconsistent setbacks or street wall continuity, or mismatched public realm design that result in visual disruption, diminished walkability, or the overshadowing of public spaces.
- **Cultural Resources:** Loss, alteration, or damage of archaeological, cultural, and historical resources and sites due to growth allowed by alternatives.
- **Environmental Justice:** Land use or urban form changes that disproportionately impact historically marginalized or underserved communities with environmental, health, or socioeconomic burdens. This includes increased exposure to noise and light pollution, as well as urban heat island effects, especially in areas with high environmental health disparities, sensitive populations, and limited tree canopy, vegetation, or public open space.

3.4.1 Affected Environment

Local Policy Framework

This section outlines the city's current land use and zoning framework, along with policies and regulations related to urban form such as height, bulk and scale, transitions, and views, and describes current land use conditions. Most state, regional, and local land use policies are reviewed in **Section 3.6 Relationship to Plans, Policies, and Regulations,** while the discussion below focuses on policies and regulations specific to land use and urban form.

Centers and Corridors Growth Strategy

The Comprehensive Plan, last amended in 2023, designates several centers and corridors throughout the city. It focuses most new development in specific areas identified on the Land Use Plan Map (**Exhibit 3.4-1**, **page 3-82**), including Neighborhood Centers, District Centers, Employment Centers, Corridors, and Downtown, which serves as the city's Regional Center.

Center and corridor land use policies promote the efficient use of land by promoting density and mixed-use development in proximity to retail businesses, public services, places of work, and transportation systems. Currently, there are 7 designated Neighborhood Centers, 7 District Centers, 6 Employment Centers, and 3 Corridors. These designated areas are intended to support a mix of uses

such as higher-density housing, retail and commercial businesses, offices, and community facilities like parks, schools, and government buildings in order to create vibrant, walkable places where people can live, work, and access services.

Employment Centers share many of these characteristics but place a stronger emphasis on job-generating development, such as office campuses or light industrial uses.

Outside of these key growth areas, existing residential neighborhoods are expected to evolve more gradually, with new development carefully designed to be compatible with the surrounding homes. Higher-density housing within and around centers and corridors can strengthen local businesses and enable more efficient transit service across Spokane. As planning efforts move forward, center and corridor designations on the Land Use Plan Map may be updated to reflect local priorities and community input, ensuring the land use strategy remains flexible and responsive over time.

Relevant Existing Land Use Policies

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.

LU 3.3 Designating Centers and Corridors – Designate new centers and corridors in appropriate locations on the Land Use Plan Map through a city-approved planning process.

LU 3.4 Planning for Centers and Corridors - Conduct a city-approved subarea planning process to determine the location, size, mix of land uses, and underlying zoning within designated centers and corridors. Prohibit any change to land use or zoning within suggested centers or corridors until a subarea planning process is completed.

LU 3.5 Mix of Uses in Centers - Achieve a proportion of uses in centers that will stimulate pedestrian activity and create mutually reinforcing land uses.

LU 3.6 Compact Residential Patterns - Allow more compact and affordable housing in all neighborhoods, in accordance with design guidelines.

Subarea Plans and Neighborhood Plans

In addition to the Comprehensive Plan and the Centers and Corridors Growth Strategy, the City of Spokane has several subarea and neighborhood planning efforts that guide development and revitalization efforts in specific areas. These plans address various aspects like land use, transportation, economic development, and infrastructure**.** See **Section 3.6 Relationship to Plans, Policies, and Regulations** for discussion of subarea plans and other studies.

Existing Land Use Designations and Zoning Districts

Existing Land Use Plan

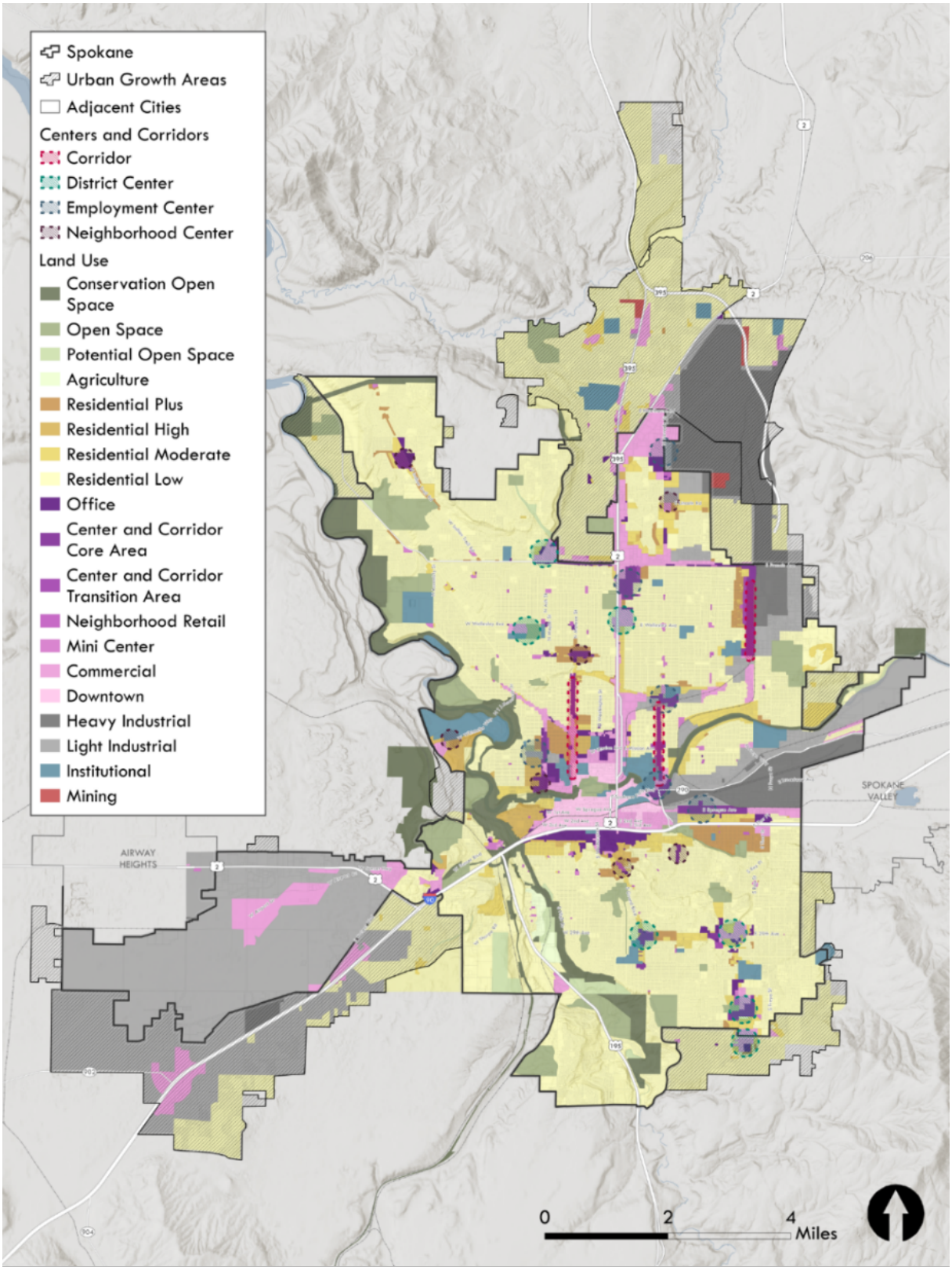
The City of Spokane covers approximately 70 square miles, with residential land use making up the largest portion (55%). Residential areas are currently categorized into three main designations: Residential 10-20 (low), Residential 15-30 (moderate), and Residential 15+ (high).

Approximately 10% of land is designated for commercial and office use including Neighborhood Retail, Mini Center, Center and Corridor (CC) Transition, and CC Core designations, 19% for industrial uses, 3% for institutional uses, and 12% for parks, open space, water, or vacant land.

Exhibit 3.4-1 shows the distribution of existing land uses across the city and **Exhibit 3.4-2** shows the acreage associated with each land use designation. The highest concentrations of commercial, mixed-use, and multi-family development are located in the Downtown area, as well as in the Center and Corridor and High Residential areas along major corridors such as North Division Street and East Sprague Avenue, and within designated Centers. Low density residential neighborhoods predominately made up of single-unit dwellings fill most land area while parks, open space, and major institutional areas fill intervening spaces. Industrial development is concentrated in industrial areas, along the Spokane River, and railroad corridors.

Exhibit 3.4-3 provides a summary of future land uses by area, outlining how Residential, Commercial/Mixed-Use, Industrial, and Open Space/Agricultural uses are emphasized across different parts of the city of Spokane. The existing land uses in some cases match the intended densities and uses in the Comprehensive Plan, or are less developed and do not yet reflect the future land use. See **Exhibit 3.4-2**.

Exhibit 3.4-1. Adopted Land Use Plan Map as of 2025



Sources: City of Spokane; BERK, 2025.

Exhibit 3.4-2. Existing Land Use Designation (summarized) by Acreage

Land Use Category (summarized)	Included Categories	Area (acres)
Low Residential	Residential Plus, Residential Low	22,381
Industrial	Mining, Heavy Industrial, Light Industrial	8,337
Open Space	Agriculture, Conservation Open Space, Open Space, Potential Open Space	5,387
Commercial	Office, Commercial, Neighborhood Retail, Mini Center	3,444
Moderate to High Residential	Residential Moderate, Residential High	2,268
Institutional	Institutional	1,249
Center and Corridor	CC Core Area, CC Transition Areas	761
Downtown	Downtown	636

Sources: City of Spokane; BERK, 2025.

Exhibit 3.4-3. Summary of Existing Land Uses by Area

Area	Residential Density	Commercial/ Mixed-Use	Industrial	Open Space / Agriculture	Notes
Northwest Spokane	Primarily low density; scattered moderate-density pockets	Commercial and mixed-use nodes along Francis Ave and Wellesley Ave	Industrial near western edge by transport corridors	Open space and agriculture on outskirts	Major corridors define commercial nodes
Northeast Spokane	Mix of low- and moderate-density	Commercial clusters along Market Street and arterials; some mixed-use corridors	Concentrated heavy and light industrial zones, especially near rail lines	Open space and agriculture on fringe areas	Industrial concentrated in far northeast

Area	Residential Density	Commercial/ Mixed-Use	Industrial	Open Space / Agriculture	Notes
Division Corridor	Higher-density residential nodes along corridor	Dense mix of retail, services, mixed-use; commercial intense near Center City and key intersections	Not emphasized	Not emphasized	Major north-south commercial spine
Center City	Medium- to high density residential (high-rise, mid-rise)	High-density commercial, institutional, mixed-use dominant	Some limited industrial uses in the eastern edge.	Not emphasized	Includes Downtown, University, Medical District
South Hill / South Spokane	Primarily low density with pockets of higher-density	Mixed-use and higher-density along Grand Blvd and Perry St	Not emphasized	Substantial parks and open spaces	Institutional uses: schools, medical facilities
West Plains	Pockets of low density residential	Limited commercial near highway interchanges	Large-scale industrial (light near airport and I-90; some heavy)	Open space in undeveloped sections; agriculture present	Industrial dominant area

Sources: BERK, 2025.

Land Use Code

Zoning Districts

The City of Spokane utilizes a zoning code that divides the city into various districts, each with its own set of regulations for land use and development. These districts are categorized into Residential, Commercial, Industrial, and Mixed Use (i.e., Downtown and Centers and Corridors) categories, with further subdivisions—each tailored to accommodate different uses and development intensities. See **Exhibit 3.4-4**.

Key aspects of Spokane's land use code (SMC Title 17) establish districts and the different uses and standards that apply to different districts including:

- Zoning Districts: These define the types of land uses allowed in different areas, such as residential, commercial, industrial, and mixed-use.
- Permitted Uses: The code specifies what types of buildings, structures, and activities are allowed within each zoning district.
- Building Regulations: This includes height restrictions, setbacks (distance from property lines), lot coverage, and other development standards.
- Subdivision Regulations: Regulations governing the division of land into lots for development.
- Sign Regulations: Rules for the size, location, and type of signs allowed.
- Parking Regulations: Requirements for parking spaces based on land use.

Exhibit 3.4-4. Existing Zoning Districts Summary Table

Zone Category	Zone Type
Residential	RA, R1, R2, RMF, RHD
Commercial	O, OR, NR, NMU, CB, GC
Downtown	DTC, DTG, DTU, DTS
Industrial	LI, HI, PI
Centers and Corridors	CC1, CC2, CC3, CC4

Sources: City of Spokane; BERK, 2025.

- **Characteristics of Residential Zones:**
  - Residential Agriculture (RA) – Low-intensity; for agriculture-related uses like farming, greenhouses, single-unit homes, and on-site product sales.
  - Residential 1 (R1) – Low-intensity; detached, attached, and middle housing at the scale/height of single-unit homes.
  - Residential 2 (R2) – Low-intensity; similar to R1 but allows slightly higher housing density.

- Residential Multifamily (RMF) – Medium-intensity; mix of detached, middle housing, and larger multi-unit buildings; denser than R2.
- Residential High Density (RHD) – High-intensity; tallest and most dense housing, including RMF-type housing and large apartment complexes.

- **Characteristics of Commercial Zones:**
  - Office (O) – Low-intensity; small-scale offices in or near residential areas; designed to compliment residential areas and serve nearby neighborhoods.
  - Office Retail (OR) – Higher-intensity; larger offices plus supporting retail/services; often in downtown-adjacent areas; retail limited to avoid dominating.
  - Neighborhood Retail (NR) – Neighborhood-serving, pedestrian-oriented businesses; limits on auto-oriented uses like gas stations or drive-throughs.
  - Neighborhood Mixed Use (NMU) – Similar to NR but encourages residential units alongside commercial; allows more commercial space if housing is included.
  - Community Business (CB) – Auto-accommodating commercial; wide range of local/regional retail and services; some size limits near neighborhoods.
  - General Commercial (GC) – Broadest range of retail, services, and limited industrial; industrial uses restricted in size to maintain commercial focus.

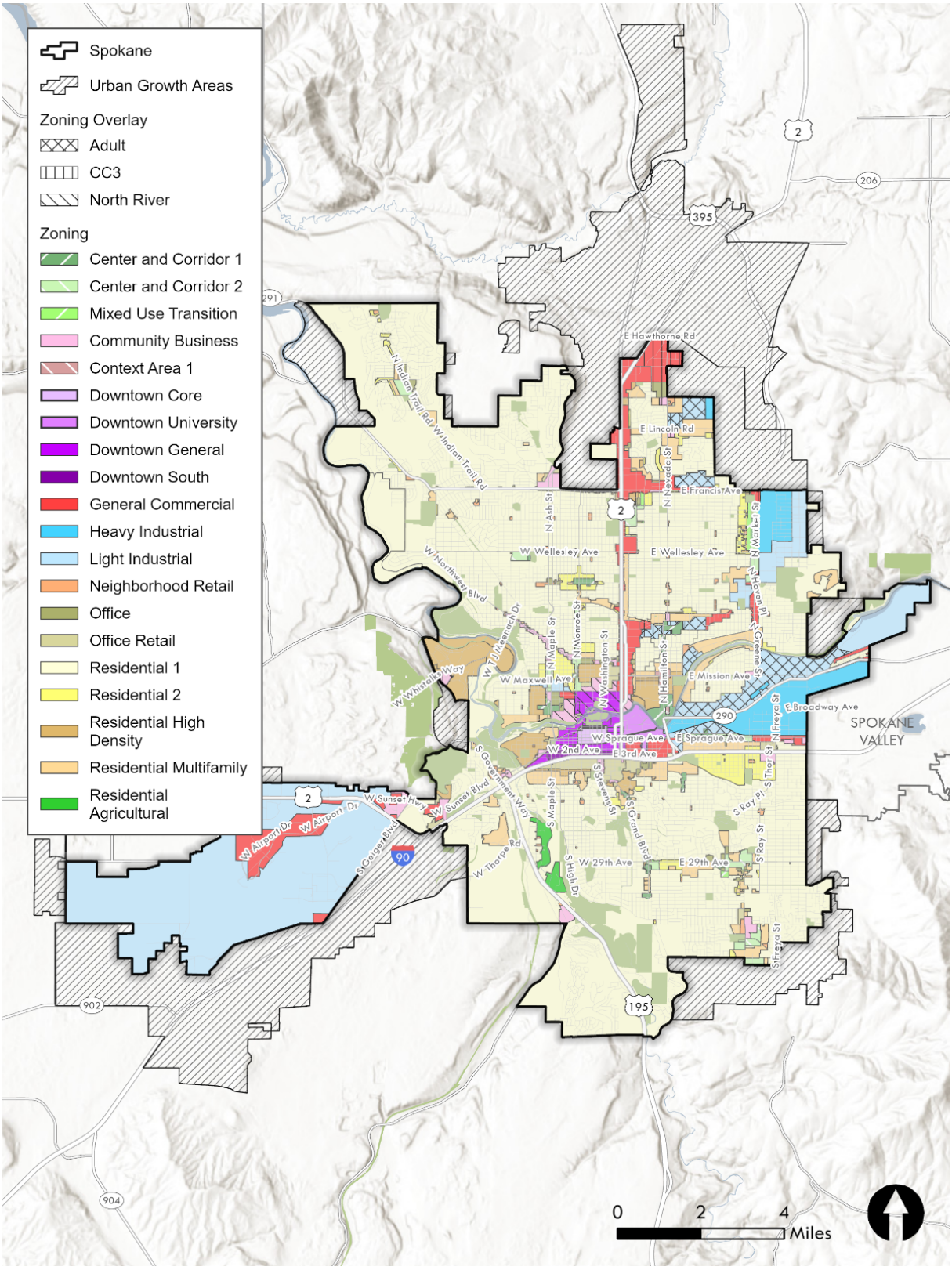
- **Characteristics of Downtown Zones**
  - Downtown Core (DTC) – Central downtown; tallest and most intensive building heights and massing in the city.
  - Downtown General (DTG) – High-density, mixed-use; encourages retail at street level with residential/office above; wide range of uses but discourages auto-oriented and heavy industrial.
  - Downtown University (DTU) – Supports an urban university environment; promotes pedestrian-friendly spaces with a mix of residential, office, retail, and related commercial uses.
  - Downtown South (DTS) – South of the railroad viaduct; accommodates a wide mix of uses, including auto-oriented businesses.

- **Characteristics of Industrial Zones**
  - Light Industrial (LI) – Wide range of industrial, commercial, and office uses; commercial size limited to maintain industrial focus; residential allowed near the Spokane River; minimal but safe and environmentally sound standards.
  - Heavy Industrial (HI) – Primarily high-impact industrial; allows compatible office and limited commercial; similar residential allowance near the river as LI; standards ensure safe, efficient, and functional development.

- Planned Industrial (PI) – For light or heavy industrial areas; prioritizes employment-focused uses; nonindustrial uses limited unless part of an approved site plan or development.

- **Characteristics of Centers and Corridors**
  - These regulations carry out the Comprehensive Plan's goals for centers and corridors –areas designed to concentrate jobs, shopping, and housing in shared locations. They promote economic activity through new development and redevelopment with cohesive, mixed-use patterns, higher-density housing, street-oriented buildings, screened rear parking, pedestrian safety, alternative transportation, quality design, smaller blocks, and narrow, on-street-parking streets.
  - Zones include:
    - Type 1, 2, and 3 (CC1–CC3): Located in center and corridor core areas and core commercial areas shown on the land use plan map.
    - Type 4 (CC4): Mixed-use transition zones in designated transition areas.
    - These zones apply to properties within the plan's mapped centers and corridors. The zoning map also shows the center type: Neighborhood Center (NC), District Center or Corridor (DC), and Employment Center (EC).
    - Identified as a Center and Corridor Core Area in the Land Use Plan, the Hamilton Form Based Code in the South Logan area implements a Context Area (CA) zone and Shopfront requirements.

Exhibit 3.4-5. Existing Zoning Map as of 2025



Source: City of Spokane, 2025.

Exhibit 3.4-6 presents the acreage associated with each zoning category. It shows that Residential 1 is by far the largest zone in the city, followed by Light Industrial, General Commercial, and Residential Multifamily.

Exhibit 3.4-6. Zone by Acreage

Zone Category	Zone Type	Zone Description	Area (acres)	Percent
Residential	RA	Residential Agricultural	147	0.3
	R1	Residential 1	26,763	60.1
	R2	Residential 2	905	2.0
	RMF	Residential Multifamily	1,853	4.2
	RHD	Residential High Density	1,171	2.6
Commercial	O	Office	301	0.7
	OR	Office Retail	418	0.9
	NR	Neighborhood Retail	177	0.4
	NMU	Neighborhood Mixed Use	No acres, not applied	Not applicable
	CB	Community Business	606	1.4
	GC	General Commercial	1,932	4.3
Downtown	DTC	Downtown Core	95	0.2
	DTG	Downtown General	480	1.1
	DTU	Downtown University	202	0.5
	DTS	Downtown South	91	0.2
Industrial	LI	Light Industrial	7,309	16.4
	HI	Heavy Industrial	1,168	2.6
	PI	Planned Industrial	No acres, not applied	
Centers and Corridors	CC1	Center and Corridor Type 1	316	0.7
	CC2	Center and Corridor Type 2	490	1.1
	CC3	Center and Corridor Type 3	Applied as an Overlay	Not applicable
	CC4	Mixed-Use Transition	56	0.1
	CA	Context Area 1 (CA1)	53	0.1

Source: City of Spokane, BERK, 2025.

Centers and Corridors: 2024 Assessment Study

In 2024, the Centers and Corridors Update Study was conducted to evaluate the effectiveness of the current growth strategy and provide recommendations for the 2026 Comprehensive Plan Periodic Update. The proposed changes will impact how centers and corridors are designated, the types of designations used, public investment policies, and development regulations. Key recommendations include eliminating the Employment Center designation and integrating it into other typologies, clearly defining implementing zones for each typology, and updating the mapping of land use designations for Centers and Corridors. Furthermore, the study proposed that mixed use zoning (see below) might be allowed in limited areas outside designated Centers & Corridors.

A key regulatory change recommendation is the introduction of a new family of mixed-use zones to replace the existing Center and Corridor zones:

- MU-TOD: emphasizes uses that support walking activity and high-intensity development, to be applied near high-capacity transit stops.
- MU-1: the "base" mixed-use zone that allows a broad mix of uses and high-intensity development, intended primarily for District Centers and Corridors.
- MU-2: oriented towards a narrower range of walking-friendly uses and moderate-scale development, intended primarily for Neighborhood Centers and Mini-Centers
- MU-3: oriented towards smaller-scale development, intended for peripheral areas at the end of centers. This is intended to replace both the CC4 and NMU zones.

Other notable regulatory proposals include increased height limits, relaxation of zone edge transition standards, maximum block length/through-block connection standards, and updates to block frontage standards (provisions for Pedestrian-designated streets and other block frontages).

Overlay Districts

Spokane has three major overlay zones that influence land use in specific areas of the city. The North River overlay zone limits the maximum floor area ratio and site coverage to protect the public's view of the Spokane River, Riverfront Park, and the Downtown core. The Adult overlay zone coincides with the area of the city where adult business may be located. Finally, the Center and Corridor (CC3) overlay zone is applied in areas near existing centers and corridors, allowing development in those areas to use either the standards of the Type 1 or 2 Center and Corridor zone or the existing underlying zone. Additionally, there are further height limitations related to the flight paths of Spokane International Airport, Fairchild Air Force Base, and Felts Field.

Urban Form Regulations

Development regulations govern what uses are permitted, as well as the physical form (such as heights and setbacks) of development, which influences the form and function of urban environments. Policies guiding height, bulk, and scale in the Land Use Element of the current Comprehensive Plan include:

- LU 5.5, Compatible Development: *Ensure that infill and redevelopment projects are designed to be compatible with and complement surrounding uses and building types.*
- LU 1.4: *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.*
- LU 2.1, Public Realm Features: *Encourage features that improve the appearance of development, paying attention to how projects function to encourage social interaction and related to and enhance the surrounding urban and natural environment.*
- LU 2.1, Performance Standards: *Employ performance and design standards with sufficient flexibility and appropriate incentives to ensure that development is compatible with surrounding land uses.*

Height, Bulk, and Scale

Height, bulk, and scale regulations vary greatly by location in Spokane. See **Exhibit 3.4-7**. Low intensity residential zones (R1, R2) feature height limits of 40 feet, with setbacks of 10 to 15 feet and a maximum lot coverage of 50% to 65%, while higher intensity and mixed-use zones allow for smaller setbacks, greater lot coverage, and taller buildings. Tall buildings are required to have maximum floor area for floors above seventy feet to contribute to a visually interesting skyline and to blend cohesively into the existing urban form.

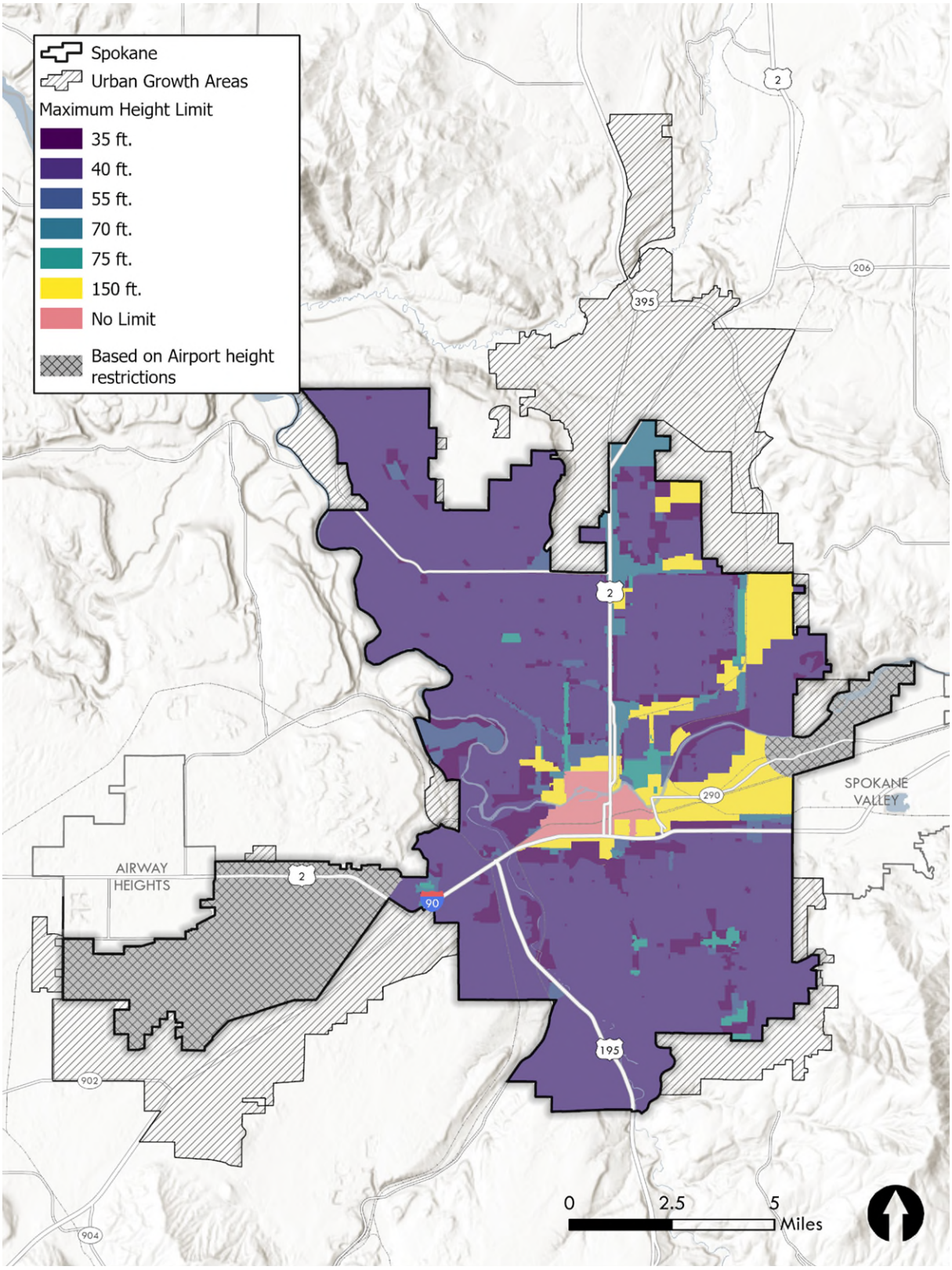
Transitions

To ensure compatibility between zones of varying intensity, the Spokane zoning code requires elements such as lower height limits for lots located near lower intensity residential zones. Additionally, specific zones such as Mixed-Use Transition are used to transition between higher and lower intensity areas.

Tree Canopy

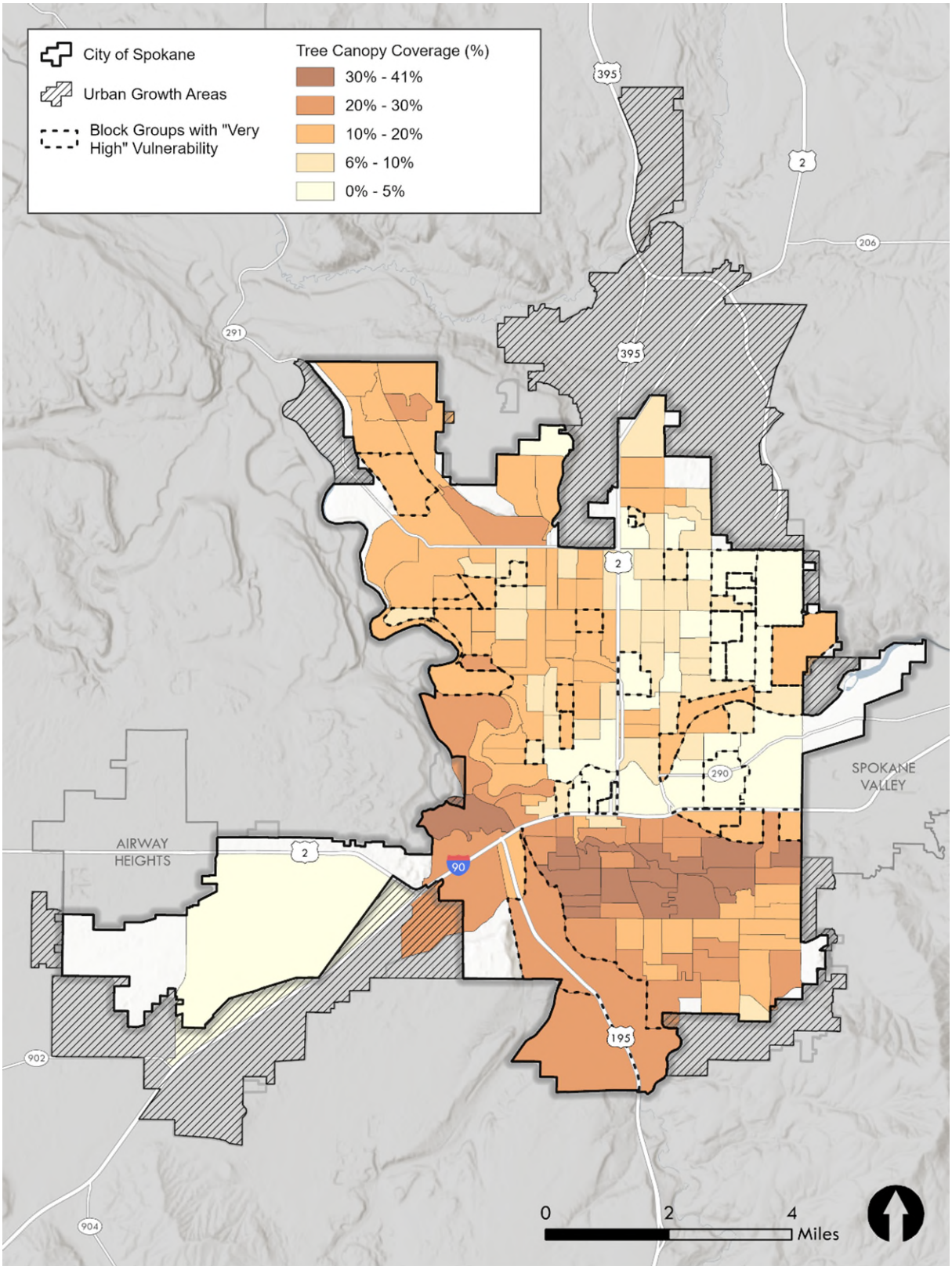
Spokane has a variety of policies intended to enhance their urban forest, reduce stormwater runoff, and provide shade and shelter. Trees are required to be planted and maintained by adjacent property owners, and enhancing the urban tree canopy is a central goal of the Spokane Comprehensive Plan. **Exhibit 3.4-8** illustrates the percentage of each block group's area covered by tree canopy. It reveals higher canopy coverage in parts of South Spokane, while Center City, West Plains, and Northeast Spokane show notably lower coverage. It also highlights that several block groups identified as facing high climate vulnerability (due to a range of climate hazards, environmental and health conditions, or socioeconomic factors) are situated in areas with low tree canopy coverage.

Exhibit 3.4-7. Maximum Height Limit



Source: City of Spokane, 2025; BERK, 2025

Exhibit 3.4-8. Tree Canopy Coverage



Source: National Land Cover Database, 2021; BERK, 2025.

Views

Maintaining views and vistas is one consideration in planning for new development in Spokane, helping to support a unique sense of place for Spokanites. Ensuring ample open space and reducing the bulk of large buildings are major parts of this. In addition, key view corridors, such as around the St. John's Cathedral at the south end of Center City, get special consideration and impact how tall nearby buildings can be. In addition, views are considered in the city's land use standards in the North River Overlay district:

> *Section 17C.160.020 Views, Vistas and Site Coverage Design: To maintain views, vistas from the ground level to the Spokane River Gorge and Downtown Spokane from the north side of the river. Views, vistas and pedestrian access should be maintained at periodic intervals in a north to south direction. Ideally the views from the public street system will allow the viewing of the Spokane River's path and the recognition of the natural environment along the river.*

Major Land Use/Development Policies and Efforts Currently Under Consideration

Interim elimination of height limits: In early 2025, City leadership introduced an interim ordinance eliminating building height limits across over 200 downtown blocks, aiming to boost housing and economic development.

Reform proposals for Centers & Corridors zones: In mixed-use Centers & Corridors areas, the city is proposing to:

- Raise height limits from 40/55/150 ft to 55/75/150 ft, depending on zone classification.
- Ease transition height requirements adjacent to single-family zones
- Remove maximum FAR and introduce a modest minimum FAR, simplifying density control.
- Offer height bonuses for providing affordable housing, off-street (concealed) parking, or public art.
- Revise the existing Center and Corridor zoning designations to reflect Mixed-Use terminology.

Height controls near Riverfront Park: Although only interim changes have been made (see above), height limits along Spokane Falls Boulevard, south of Riverfront Park, were reviewed due to concerns over shadowing; proposals include flexibility in height with limits on tower floor sizes and spacing to protect park light and views.

Transit-Oriented Development: Division Street BRT & North Spokane Corridor: Division Bus Rapid Transit (BRT) is being planned along Division Street, expected to launch in 2027–2029. The project includes land-use planning to support increased density along the corridor**.** The North Spokane Corridor (US 395 freeway) is also under development and is slated for completion by 2030; it includes recognizing the corridor as a multi-modal freeway with shared transit, bike, and pedestrian facilities.

Downtown Plan Update & Complete Street Designation: Emergency amendment to the Spokane Municipal Code that adjusts Complete Street characteristics in downtown. November 2019

Land Use Patterns and Current Conditions

Overview of Historical Planning and Land Use Patterns

The Spokane River has drawn people to the area for thousands of years and was the reason for both the Spokane Tribe of Indians' ancestors, and later, white settlement, according to the Spokane Tribe of Indians tribal history. The Spokane ancestors were a river people, living a semi-nomadic way of life hunting, fishing, gathering. They lived along the banks of the Spokane and Columbia Rivers and the tributaries in much of northeastern Washington, which consisted of approximately three million acres. During salmon runs, other tribes joined the Spokanes at the falls for fishing, trade, games, celebration, and socializing (City of Spokane, 2025) (Spokane Tribe of Indians, 2020).

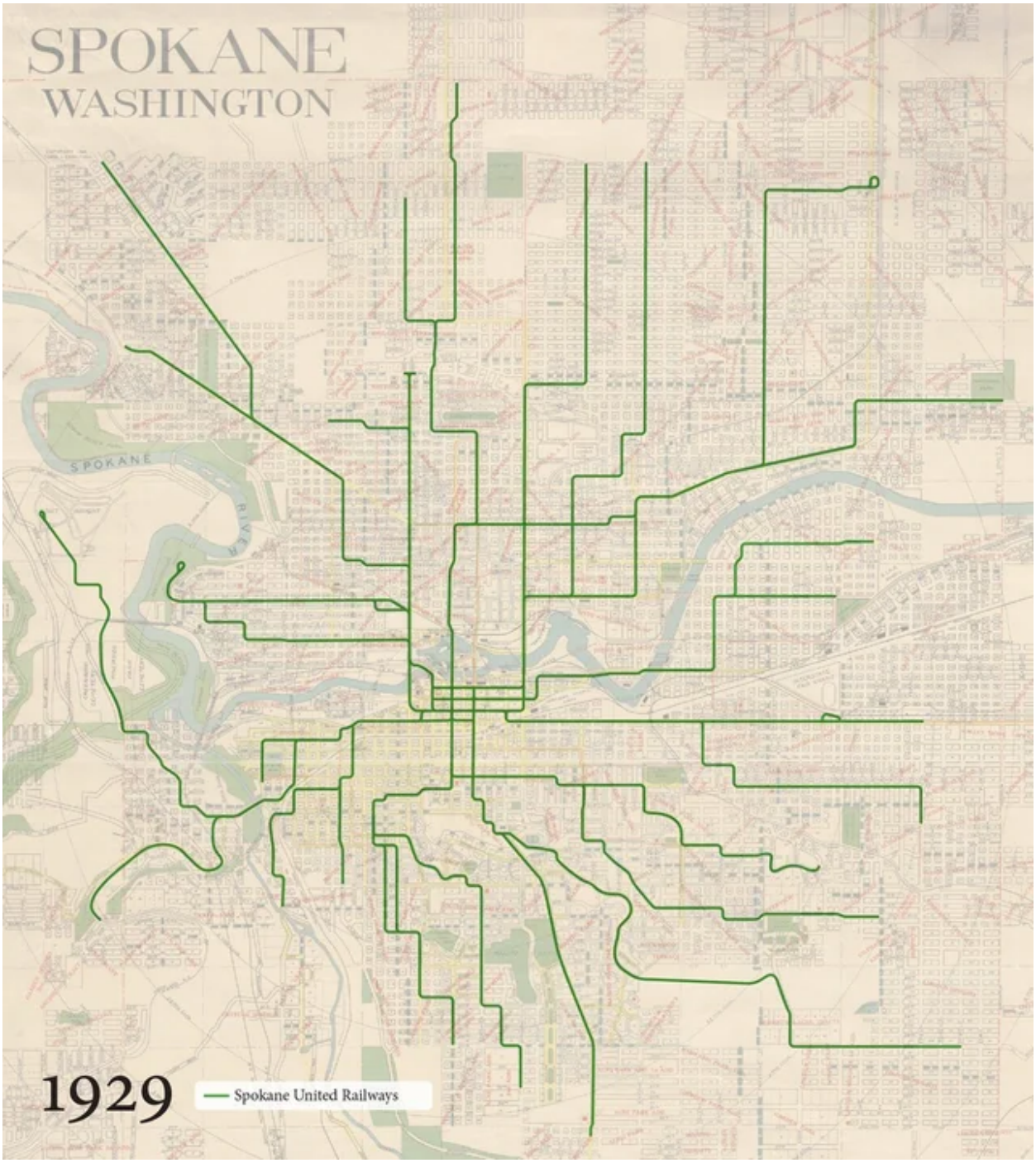
In the 1800s, U.S. soldiers arrived and displaced the Spokanes from their ancestral land as white settlement increased. Settlement increased within the area in the 1870s as the first sawmill was built, followed by stores, churches, schools, banks, hotels, saloons, and a newspaper. The area was formally settled in 1873 by James Nettle Glover as Spokan Falls (later named Spokane Falls, and then just Spokane). In 1881, President Rutherford B. Hayes formally established the Spokane Indian Reservation of approximately 154,602 land acres known as Chief Lot's reservation, which was located northwest of the present city. In that same year, Spokane was incorporated with a population of about 350 (City of Spokane, 2025; City of Spokane, N.D.). The arrival of the Northern Pacific Railroad around the same time and its transcontinental linkage in 1883 marked a transformative period in Spokane's development, positioning the city as a key transportation and commercial hub. The discovery of gold in the nearby Coeur d'Alene mining district further spurred economic growth, making Spokane the principal gateway to the Pacific Northwest, leading to a surge in population and infrastructure. Despite the Great Fire of 1889, which destroyed 32 downtown blocks, the city was quickly rebuilt with durable materials, sparking a period of intense growth and construction (City-County of Spokane Historic Preservation Office, 2005).

The expansion west brought mining, railroad, and timber industries, which brought new immigrants from all over the world in the 1800s, including people from China and Japan who helped build local industries and established Spokane's Chinatown on Front Street. Spokane's Chinatown began in the 1880s and was at first mostly populated by Chinese laborers who had immigrated in the 1850s and 1860s to work in the local railroad and mining industries, with Japanese immigrants arriving in the 1890s. Many Chinese and Japanese businesses were destroyed in the Spokane Fire of 1889 and the population of Chinese residents declined, partly due to the Chinese Exclusion Act of 1882 that prevented Chinese laborers from immigrating and denied recently-arrived Chinese residents citizenship. In 1921, Washington State passed the Alien Land Law which barred non-white immigrants from owning land, though specifically targeted towards Japanese and other Asian immigrants, and the number of Japanese families declined in Spokane. WWII reversed this trend, however, when Spokane became a haven for Japanese families fleeing the threat of Internment camps within the exclusion zone on the West Coast, many of whom settled into what became known as Trent Alley. In 1974, the remaining buildings and courtyards of Trent Alley were destroyed to facilitate construction for Expo '74 (City of Spokane, 2025).

African Americans began migrating to Spokane in the late 1800s, when the Great Northern Railroad brought Black workers to the area. Early families established businesses and organizations that served the growing Black population. Initially, Spokane's Black community was not confined to a specific area, however segregation later developed through local policies enacted on racial covenants and redlining, eventually concentrating the Black community in the East Central neighborhood. East Central had already been facing a post-war economic decline for decades. Spokane's Black population doubled from 1940 to 1950, and gained an additional 50% from 1950 to 1960. This rapid growth intensified segregation, particularly in housing. By the 1960s, nearly a quarter of the Black population in Spokane lived in East Central, and the area around the 5th Avenue Business District became a residential center of Spokane's Black community (City of Spokane, 2025).

Urban expansion and civic planning played pivotal roles in shaping Spokane's modern identity. By 1907, the city had nearly doubled in size to 37 square miles. In 1909, the Olmsted Brothers were brought in to guide park and landscape development, laying the foundation for Spokane's identity as the "City Beautiful." From 1888 to 1936, streetcars played a vibrant and iconic role in Spokane's history (Kershner, 2007). **Exhibit 3.4-9** shows a map of the city's streetcar network as it existed in 1929. As ridership declined, Spokane United Railways began converting its routes to bus service. Remnants of the streetcar era remain, however, as old rails can still be seen through the cobblestones of some streets. Today, over half of Downtown Spokane is designated as historic, highlighting Spokane's architectural legacy and preservation efforts.

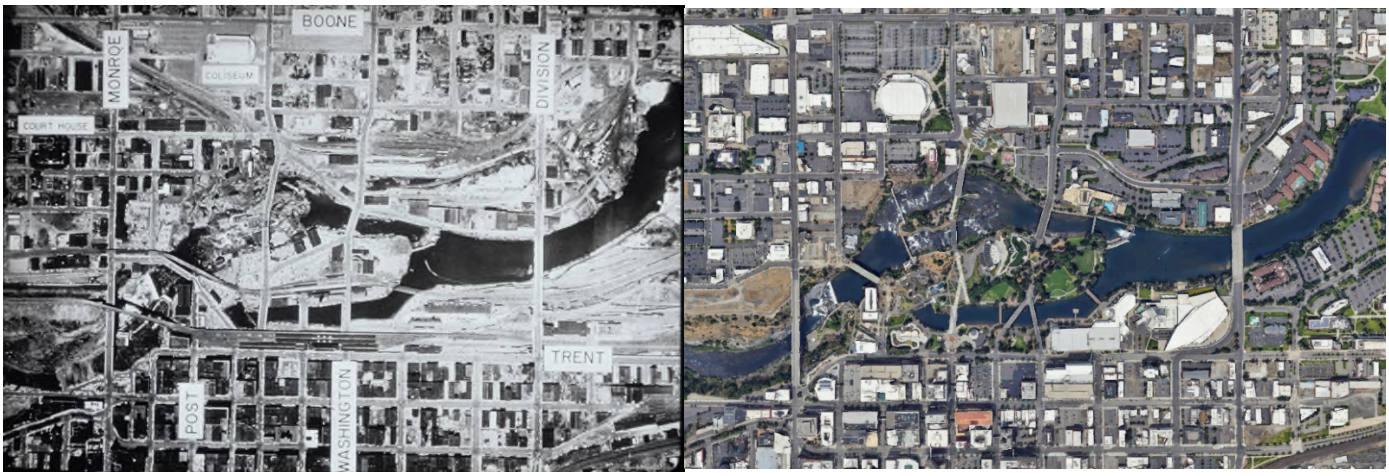
Exhibit 3.4-9. Spokane United Railways system, 1929



Source: (Transit Maps, 2017)

Between the City Beautiful movement of the early 20th century and discrete local events, such as the 1974 World's Fair and its recent 50th anniversary, Spokane's urban development has been significantly altered since it was established (City of Spokane, 2017). See **Exhibit 3.4-10.** Adaptive reuse of historic buildings and Riverfront Park's transformation from railroad hub to a park and cultural events center invite residents and visitors to the heart of Spokane. A convergence of state routes, transit, rail lines, and an airport also draw employers and investment throughout Spokane.

Exhibit 3.4-10. Aerial Image of Downtown Spokane (Circa 1970 and Present Day)



Source: (Washington State Digital Archives); Google Maps, 2025.

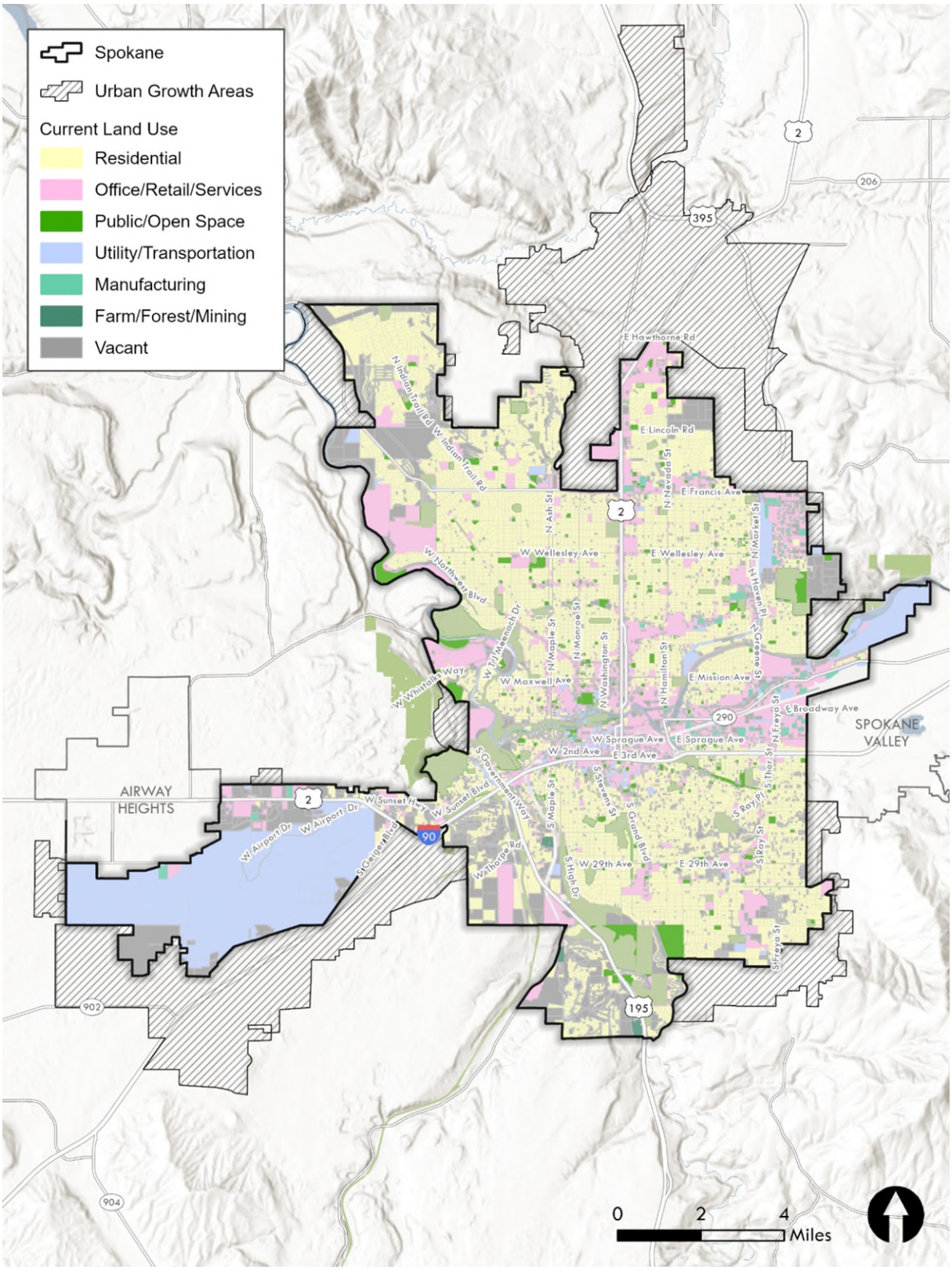
Current Conditions

Current Uses

Spokane's major land use categories are currently residential, commercial, downtown, and industrial. Residential neighborhoods are concentrated outside of Center City and dominate the landscape in the middle to outer sections of South, Northeast, and Northwest Spokane. Commercial areas are concentrated around major nodes at the intersections of arterial roads, with limited mixed-use areas typically located within the core areas of the city. Commercial uses include things such as neighborhood convenience stores, major retailers, and restaurants. Industrial uses are concentrated near the major highways in the city (I-90, US 395, and US 2), as well as around the major railyard in Northeast Spokane. These industrial uses range from major construction operations to small-scale fabrication. The Downtown region consists of major office buildings, entertainment, hospitals, and major civic institutions.

Spokane's urban development is largely consistent with its land use and zoning plans, with the bulk of existing uses being residential (**Exhibit 3.4-11**). Key industrial areas, such as the region surrounding the major railyard in Northeast Spokane, have a diverse mix of local manufacturing, utility and transportation uses, and commercial-oriented services. In addition, significant amounts of currently vacant land around the edges of the city are likely to be, or in the process of, developing into new housing and services for suburban residents.

Exhibit 3.4-11. Existing Land Use



Source: Spokane County Assessor's Office, 2025; BERK, 2025.

Land Use in Northeast Spokane

Source: Google Earth

Northeast Spokane is home to a significant concentration of industrial uses, centered around the US 395 and a major railyard. Beyond this, it is home to Spokane Community College and features a diverse array of housing types, ranging from dense mixed-use developments around Hamilton and Nevada streets to more traditional low density suburban housing further north. The ongoing project to build out the North Spokane Corridor (US 395) has displaced a significant number of residents, businesses, and industries, and will significantly affect travel and freight distribution patterns in and around Northeast Spokane upon completion in 2030.

Land Use in Northwest Spokane

Source: Google Earth

Northwest Spokane is primarily residential, with commercial and mixed-uses centered just outside of downtown in the Emerson-Garfield and West Central neighborhoods. The northwesterly flowing Spokane River provides significant nearby open space for residents, while continuing suburban development along North Indian Trial Road characterizes the far north reaches of Northwest Spokane.

Land Use in Center City

Source: Google Earth

Centered around Spokane Falls on the Spokane River, Center City features a wide array of building types, uses, and ages. The intense business and commercial use in Center City is well contrasted by the shady campus of Gonzaga University and ample open space along the river. Center City functions as the heart of the region's economic and civic life.

Land Use in South Spokane

Source: Google Earth

Separated from Center City by a series of ridges and without major freight or highway routes, South Spokane is primarily residential, with a few commercial and mixed-use corridors centered around Grand Boulevard and 29th Avenue. It is generally less intensely developed than Central, Northeast, and Northwest Spokane, and features many parks and mature trees.

Land Use in West Plains

Source: Google Earth

The West Plains is centered around Spokane International Airport, the busiest airport in the Inland Northwest and a key anchor for a variety of industrial and commercial enterprises. Additionally, Fairchild Air Force Base just outside the city limits is a major driver of both employment and industry in the region, significantly affecting the mix of uses in the West Plains area. Lands around the airport have been earmarked for industrial uses and other uses more consistent with close proximity to the airport.

Building Types and Styles

Spokane has a wide variety of building types, ages, and styles, varying significantly by region of the city. In Center City, historic masonry buildings contrast with mid-century and modern architecture, and tall buildings are the norm (**Exhibit 3.4-12**). Remnants of Expo '74 and the associated downtown renaissance are evident in much of the core area near the Spokane River. Center City has the widest array of building age and type of any place in the city.

Exhibit 3.4-12. Downtown Center City Spokane

Source: City of Spokane, 2025.

Downtown is typified by a mix of historic early-19th century buildings intermixed with more modern development—much of which arose after the World's Fair in 1974 reinvigorated the downtown and updated the focus from manufacturing and industrial materials manufacturing to more office and retail uses. The tallest buildings in the city are found here as well as some of the most architecturally unique designs.

In inner neighborhoods within a 3 mile radius of downtown, that developed in the early 20th century, low-rise commercial buildings (one to two-story) along historic streetcar corridors mix with small-scale apartment buildings and craftsmen style single unit homes (**Exhibit 3.4-13**). These neighborhoods include historic alongside newly built homes, all relatively modest in height and scale and lie on a typical gridiron street pattern.

Exhibit 3.4-13. Spokane Housing and Commercial (Pacific Street)

Source: City of Spokane, 2025.

Further than three miles from Central Spokane, in places which have been urbanized since the middle of the twentieth century, there are many ranch-style homes on curvilinear streets, and residential and commercial uses are more strictly separated. Since these areas have developed more recently, it is common to find similar looking homes along blocks, rather than the more eclectic mix of ages and styles found in more central locations.

Exhibit 3.4-14. Spokane Housing (Holyoke Ave)

Source: Google Maps

Land Capacity

While Spokane, like most cities in the United States, is experiencing a housing crisis, the City has identified ample space to accommodate all of its projected future growth within its existing boundaries. The 2025 Land Capacity Analysis identified 3,000+ parcels making up some 1,800 acres (**Exhibit 3.4-15**), capable of housing nearly 70,000 additional Spokanites in 33,000 new dwelling units.

Exhibit 3.4-15. Land Capacity Analysis under Current Zoning –2025 (Acres)

Category	Parcel Count	Buildable Area
Vacant	1,151	1,118.4
Partially Used	205	355.0
Underutilized	1,672	364.8
Total	**3,028**	**1,838.2**

Source: (City of Spokane, 2025)

Cultural Resources

Cultural and Archaeological Resources

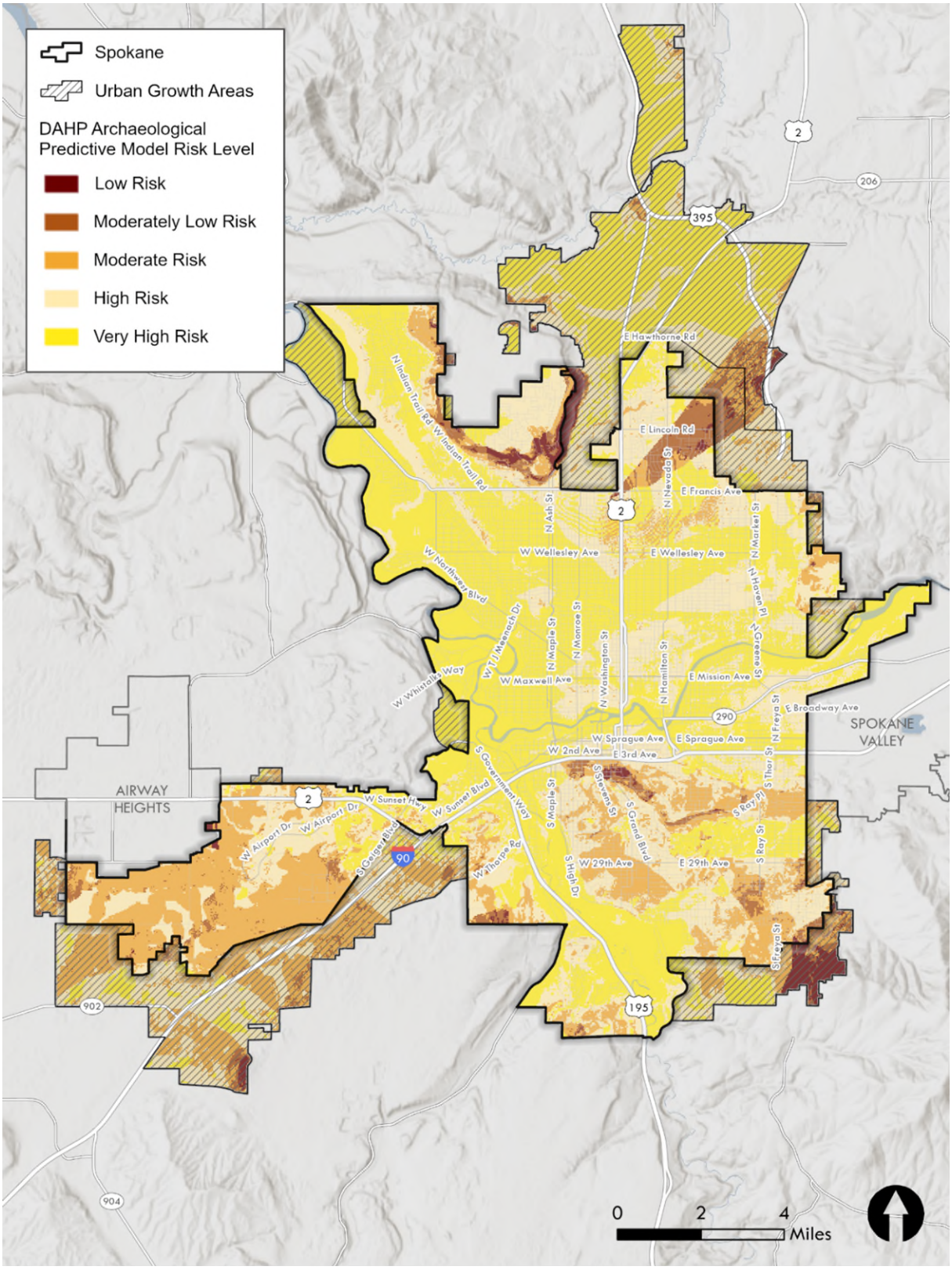
As further described in **Overview of Historical Planning and Land Use Patterns** on **page 3-95**, the Spokane Tribe's ancestral homelands encompass the Spokane River and surrounding region. The Spokanes are composed of three ethnographic bands: Lower Spokane at Little Falls and the Spokane River mouth, the Middle Spokane at Tum Tum and the Little Spokane River, and the Upper Spokane on Latah Creek and Spokane Falls. The Spokanes relied on migrating salmon in particular, which was limited greatly by the damming of the Spokane and Columbia rivers. (Historical Research Associates, Inc. , 2015) (Spokane Tribe of Indians, 2020) (Arksey, 2005) The area was also a major trading center for the Spokanes as they welcomed other area Tribes through their relations, history, trade, and ceremony.

The lower band of the Spokane Tribe was resettled to the Spokane Reservation in 1881. In 1887, the Upper and Middle Spokane people signed an agreement to move to the Coeur d'Alene, Jocko (Flathead), or Colville reservations. Some Upper and Middle Spokane Tribal members did move to the Spokane reservation. (Spokane Tribe of Indians, 2020)

The potential for archaeological resources is very high or high risk throughout most of the city limits. See **Exhibit 3.4-16**.

The City of Spokane regulates development to protect cultural resources in its Shoreline Master Program and Subdivision Code (SMC Section 17E.060.160, Chapter 17G.080). The City may require a cultural survey through the SEPA process that is applicable except where development is categorically exempt; otherwise, the City reviews development for cultural resources impacts if a proposal needs state or federal funding or permits. The City notifies Tribes of the proposals that require a notice of application or through the SEPA process.

Exhibit 3.4-16. State Archaeological Risk Assessment Model – City of Spokane Vicinity



Source: (Washington Department of Archaeology and Historic Preservation, 2025)

Historic Resources

The City of Spokane was incorporated in 1881, and shortly later in 1883 the Northern Pacific railroad was completed. (City of Spokane, N.D.) The 1880s were prosperous. Major institutions like Gonzaga University and Sacred Heart Hospital were founded and a street railway system was established. Platting of the north shore of the river began. Browne's Addition was one of Spokane's earliest neighborhoods. (Washington State Office of Archaeology and Historic Preservation, 1976) See **Overview of Historical Planning and Land Use Patterns** section above for more on historic development patterns.

The City of Spokane adopted a historic preservation ordinance (04.35) in November 1981 that established the Spokane Historic Landmarks Commission, a City/County body made up of professionals and community members which reviews applications and designate historic properties to the Spokane Register of Historic Places. For designated sites, the commission conducts design review of exterior changes.

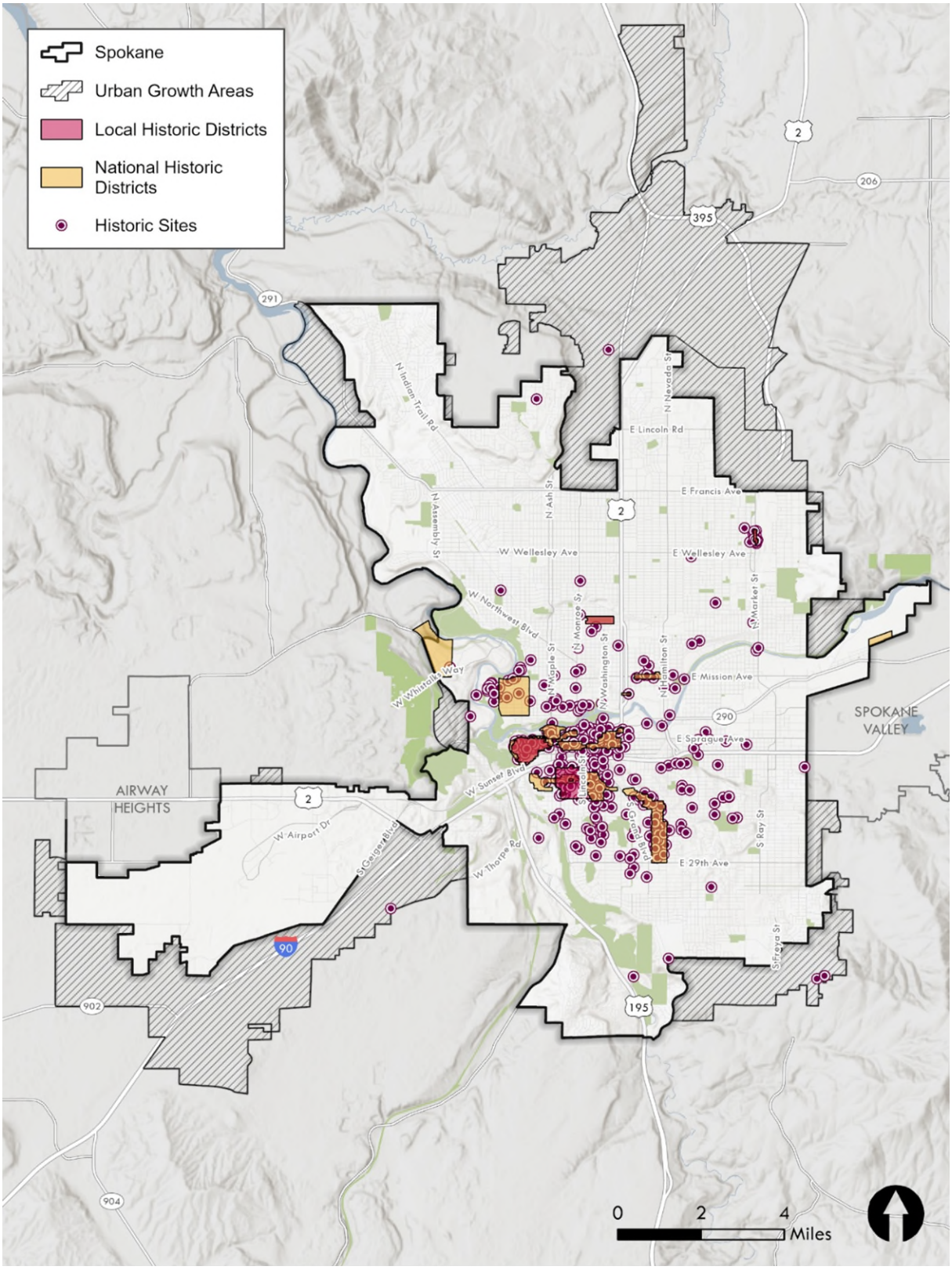
There are eighteen historic districts on the local or national registers of historic places within Spokane. There are also over 400 individual local sites designated in the Spokane Register of Historic Places. See **Exhibit 3.4-17** for a citywide view of districts and places and **Exhibit 3.4-18** for a closeup of the districts.

Exhibit 3.4-17. Historic Districts – National and Local

Name	Local	National	Acres	Study Area
Booge's Addition	Yes	No	1.3	South
Brownes Addition	Yes	Yes	113.8-133.5	South
Cannon Streetcar Suburb	Yes	No	145.4	South
Comstock-Shadle	Yes	No	1.6	South
Corbin Park	Yes	Yes	35.2-45.3	Northwest
Desmet Avenue Warehouse	No	Yes	3.7	Northeast
East Downtown	No	Yes	68.7	Center City
Felts Field	No	Yes	27.4	Northeast
Ft. George Wright	No	Yes	183.9	Northwest
Hillyard Business District	Yes	Yes	8.4	Northeast
Marycliff-Cliff Park	No	Yes	82.6	South
Mission Avenue	No	Yes	23.5	Northeast
Nettletons	No	Yes	192.9	Northwest
Ninth Avenue	No	Yes	73.6	South
Peaceful Valley	No	Yes	40.4	Center City
Riverside Avenue	No	Yes	17.4	Center City
Rockwood	No	Yes	181.7	South
West Downtown	No	Yes	35.8	Center City

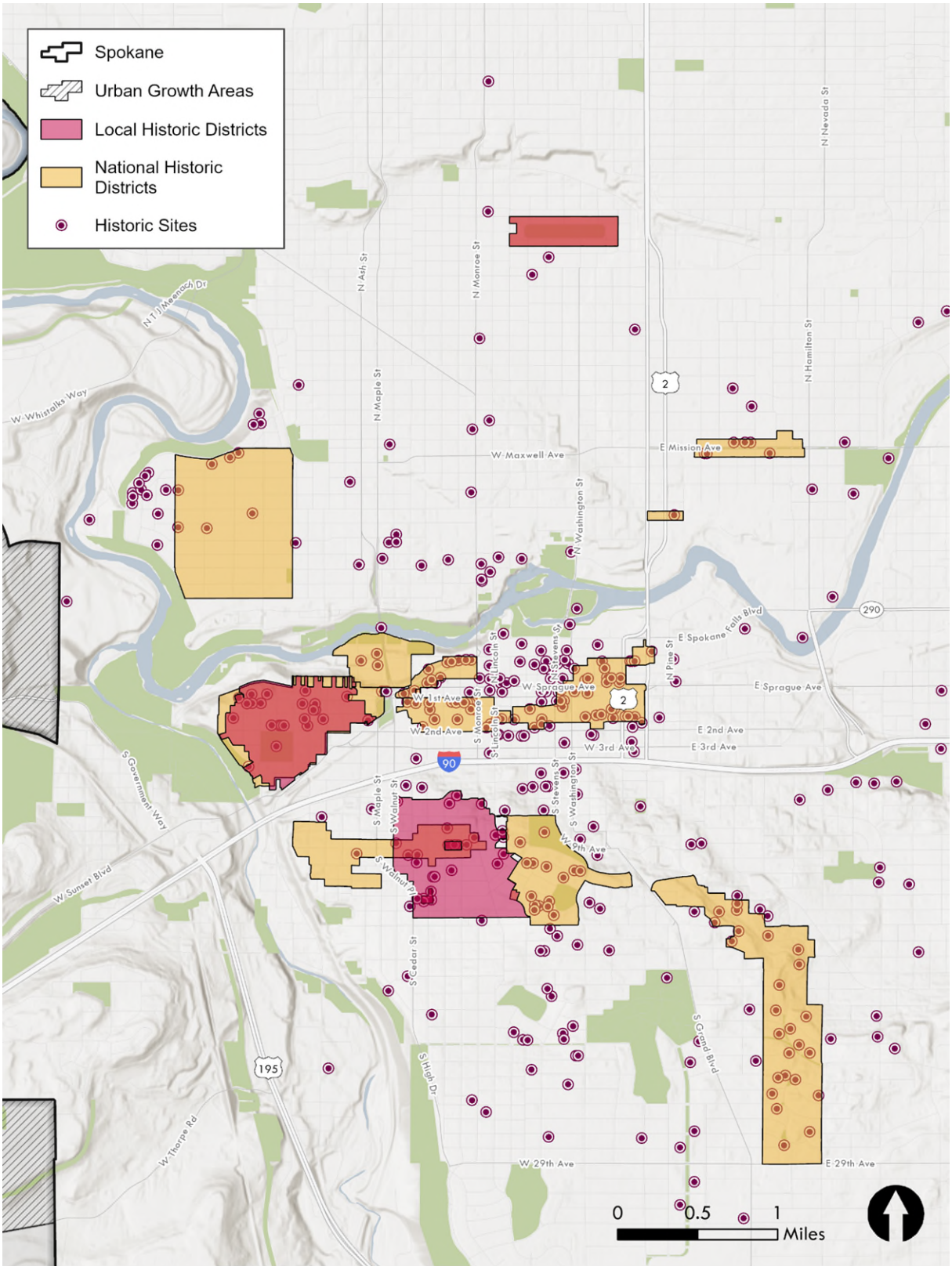
Source: Spokane City/County Historic Preservation Office, 2025.

Exhibit 3.4-18. Historic Districts and Properties in City of Spokane



Source: (Spokane City/County Historic Preservation Office, 2025)

Exhibit 3.4-19. Historic Districts and Properties – Central Spokane Vicinity



Source: (Spokane City/County Historic Preservation Office, 2025)

Environmental Justice

GMA requires that Comprehensive Plan land use, transportation, and climate elements address environmental justice. According to the Healthy Environment for All Act (also known as the HEAL Act) and the Growth Management Act, Environmental Justice is defined as (RCW 70A.02.010, RCW 36.70A.030(16)):

> *The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, rules, and policies. Environmental justice includes addressing disproportionate environmental and health impacts in all laws, rules, and policies with environmental impacts by prioritizing vulnerable populations and overburdened communities, the equitable distribution of resources and benefits, and eliminating harm.*

This section addresses the potential for disproportionate impacts to vulnerable populations and overburdened communities due to development or the location of population in areas that are affected by noise, light and glare, shade and shadow, and heat islands.

Noise

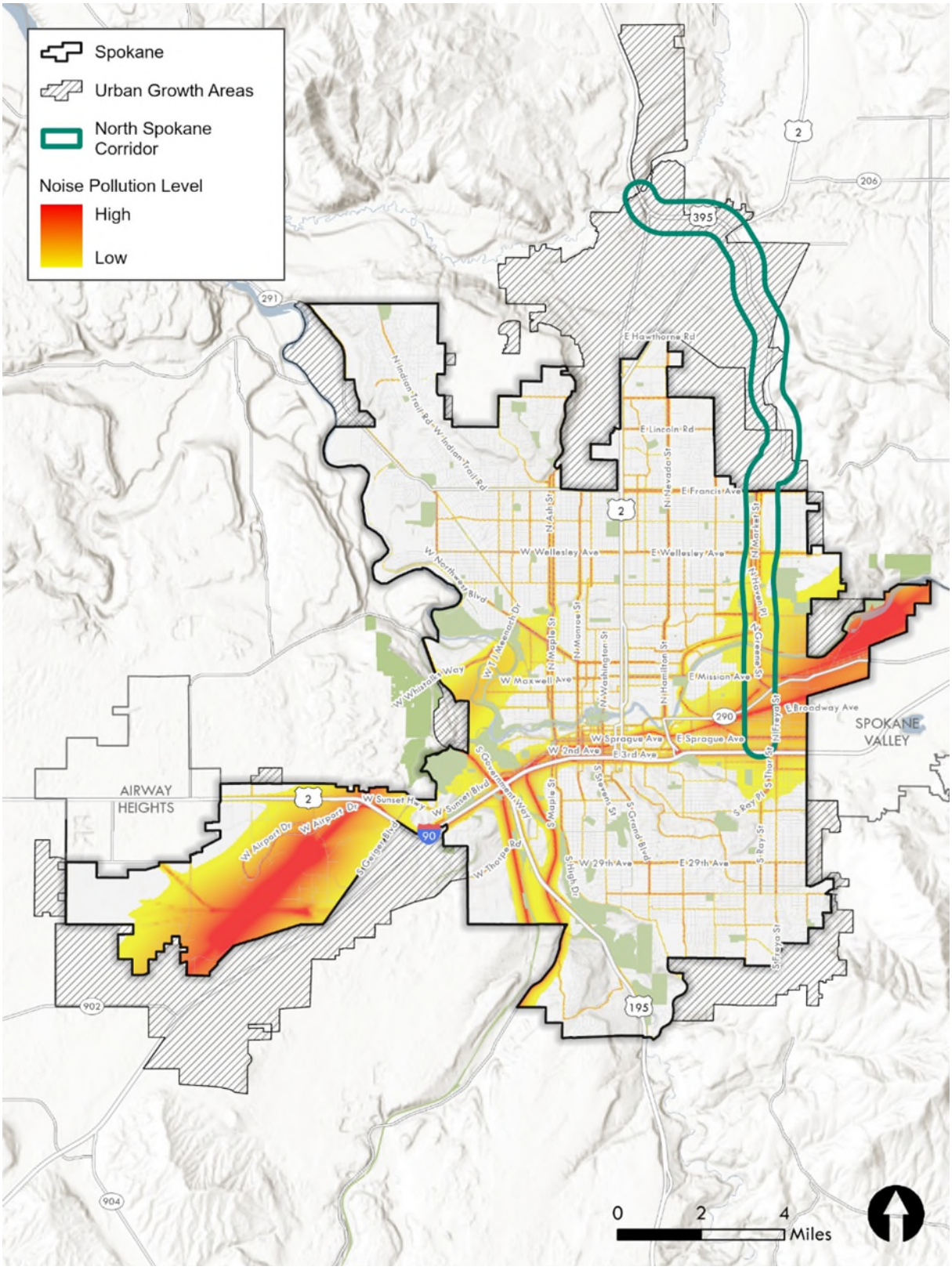
With the Spokane International Airport in the West Plains area, Felts Field—a general aviation relief airport—in Northeast Spokane, a cross-country Interstate Highway running east to west through the city, and a strategic position on the freight rail network, Spokane experiences high levels of noise pollution in many areas, adversely impacting neighborhood health and quality of life.

Exhibit 3.4-20 shows noise pollution levels across the city. The map highlights the impacts of Interstate 90 and the railroad corridor on Center City and the East Central neighborhood in particular, as well as the location of the North Spokane Corridor, a 10.5-mile multimodal transportation route planned for completion by 2030, which may contribute to increased noise impacts in the East Central neighborhood and Northeast Spokane study area.

While higher environmental noise levels are experienced in and around Spokane's two airports, the impacts of these operations are mitigated somewhat by long-standing regulations limiting sensitive land uses within areas of higher (65+ decibels (dB)) noise levels. The effectiveness of these regulations is somewhat improved by largely identical regulations in the City of Airway Heights and Spokane County.

The high noise levels are mostly clustered around those identified sources, but most major roads and interstates in Spokane are also significant contributors to noise pollution. Both current and future city policy clusters higher intensity development along these corridors, and rising traffic levels as the city population increases are likely to exacerbate these issues, particularly in overburdened communities closer to sources of noise pollution.

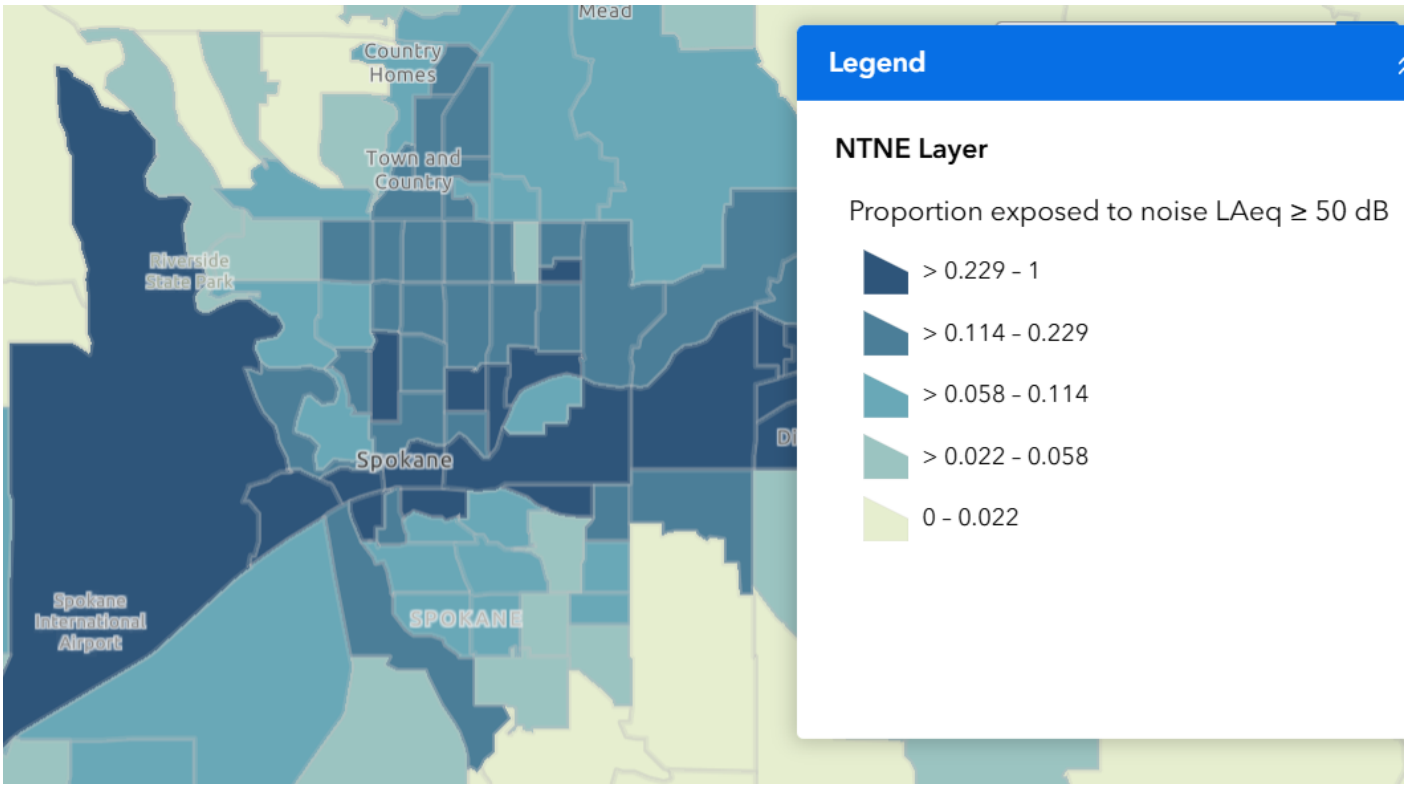
Exhibit 3.4-20. Existing Transportation-Related Noise



Source: National Transportation Noise Map, 2020; BERK, 2025.

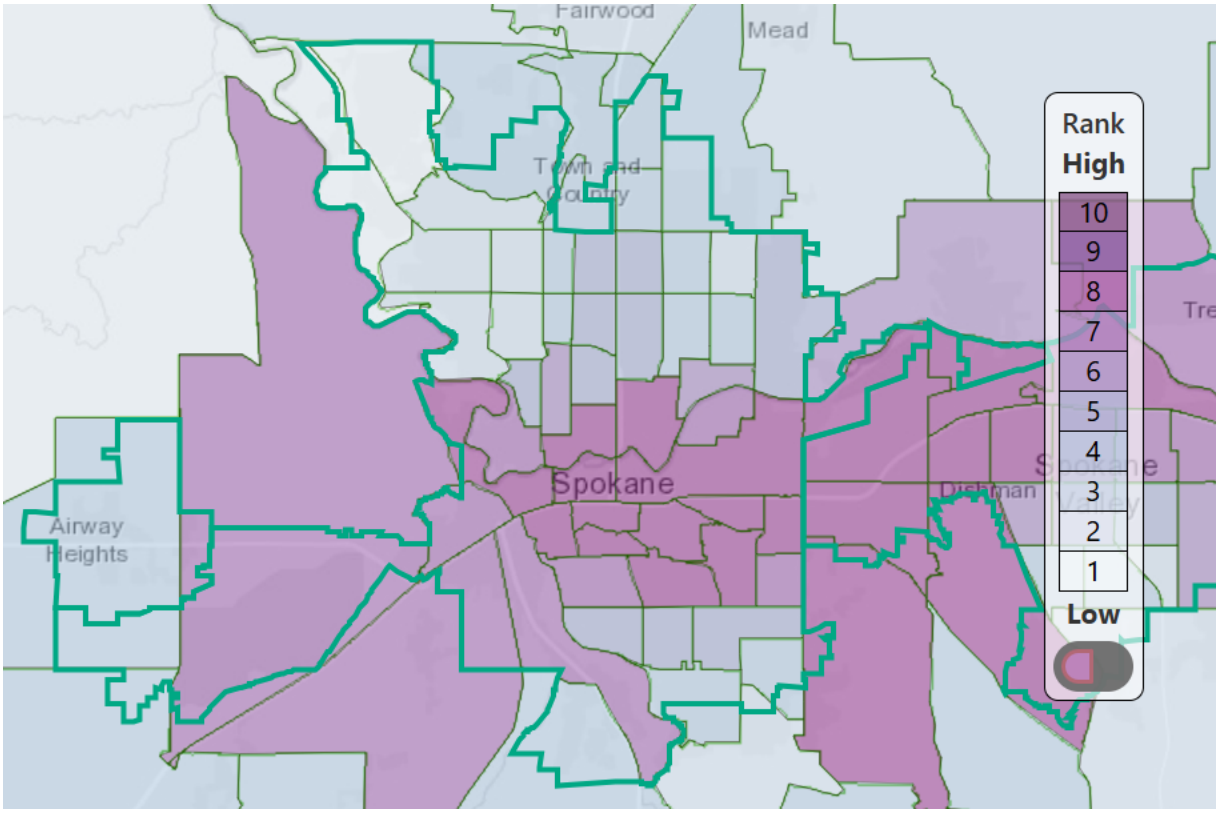
The population affected by high noise levels is relatively high in the Center City, East Central, and Northeast Spokane areas. See **Exhibit 3.4-21** and **Exhibit 3.4-22** which shows population affected by transportation noise and population affected by state roads. The Washington State Department of Health has identified that "traffic volume and density greatly impact health conditions and are associated with infant mortality, poor birth outcomes, cardiovascular disease, and cancers [and] the effect of pollution is more pronounced among the elderly and those who have preexisting health conditions." (Washington State Department of Health, 2022)

Exhibit 3.4-21. National Transportation Noise Exposure Map – Share of Population Exposed to Noise Greater than 50 dB



Source: (Seto and Huang, 2023)

Exhibit 3.4-22. Population in Census Tracts within Proximity to Heavy Traffic Roadways



Source: (Washington State Department of Health, 2022)

Light & Glare and Shade and Shadow

Light pollution includes misdirected or stray light, unnecessary reflected light, illumination during hours when it is not needed, and lighting levels that exceed what is required for a given task (MRSC, 2025). The widespread use of artificial light has substantially altered the natural pattern of darkness and obscured views of the natural night sky, and light and glare from new development have the potential to impact a significant number of residents and affect scenic resources, such as designated parks and scenic routes.

Common contributors to light pollution include building lighting, advertisements, streetlights, and illuminated sporting venues. A single light source often overlaps multiple categories. While light pollution is particularly pronounced in densely populated and highly industrialized areas, even relatively small amounts of artificial light, such as those from low density residential or commercial sources, can disrupt ecosystems, disturb human circadian rhythms, and obscure the night sky (Wu, 2024).

Hilly topography plays a major role in the prevalence of shadows. Generally, the north side of a hill or areas within a valley experience extended periods of shadow throughout the day. Trees, especially large, dense evergreens, contribute to these shadows year-round. Additionally, building heights play a

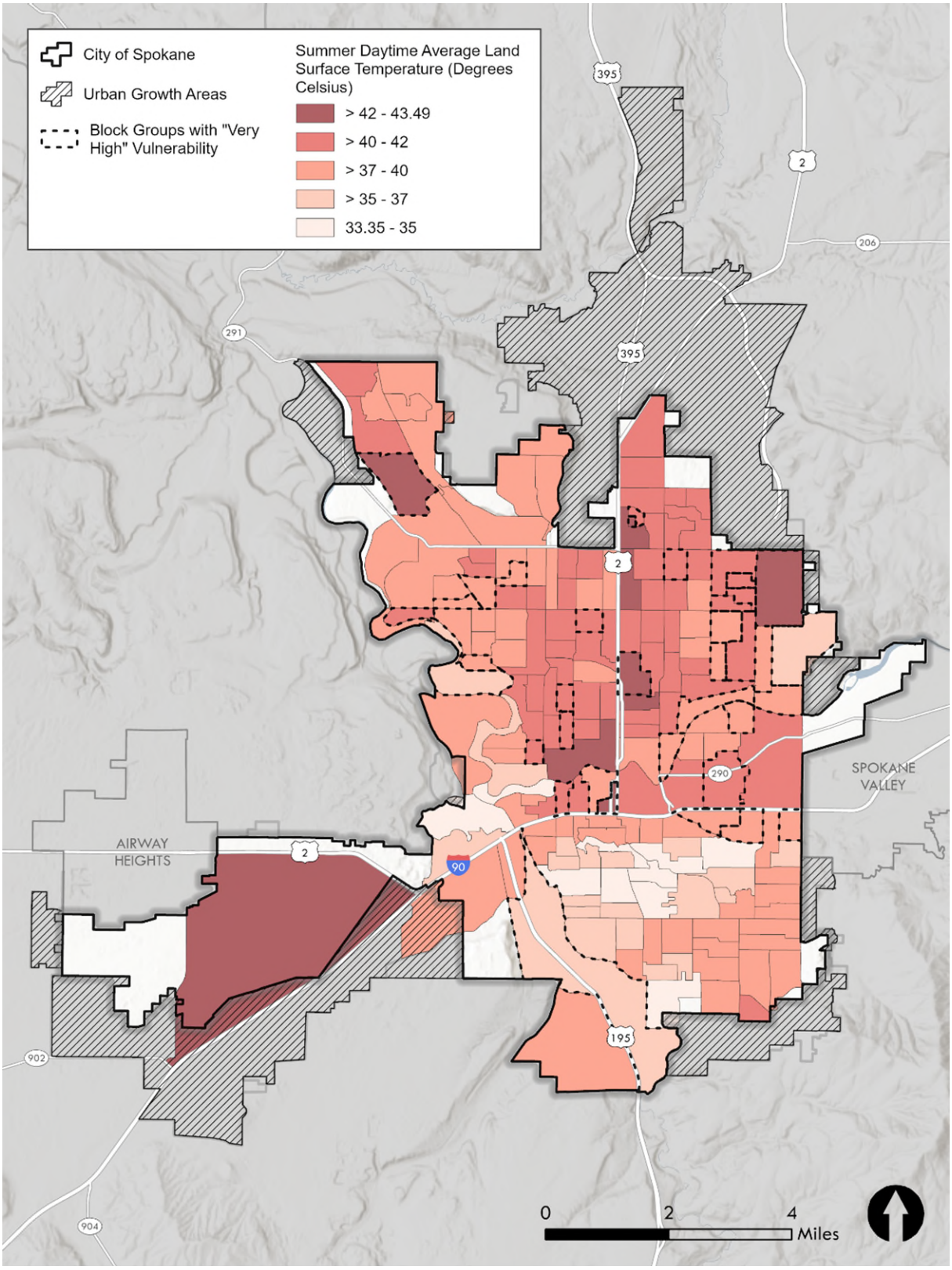
major role in shadow formation, as structures over two stories tall often cast long shadows that reach the sidewalk.

Viewpoints and scenic routes often concentrate along waterfronts and topographically high points. Factors that may influence a lack of viewpoints include a combination of topography with fewer natural viewpoints, large trees blocking views, and limited public space at high points. The 2008 Fast Forward Spokane Plan articulated a vision to foster and improve upon Downtown's 'sense of place.' Central to this vision was the objective to protect solar access in key areas, as well as preserve views of important amenities. One strategy outlined in the plan emphasized the community's strong desire to maintain optimal sunlight exposure in critical public spaces, such as Riverfront Park, through thoughtful urban design, including the promotion of buildings that minimize shadows (City of Spokane, 2008; City of Spokane, 2017). Protecting important views, such as those of the Spokane River and landmarks like St. John's Cathedral, is supported by specific overlay zones and design standards.

Heat Island

Spokane, like most urbanized areas, struggles with the Urban Heat Island effect. The most affected areas have low tree canopy and high impervious surfaces, exacerbating high land surface temperatures. People can be affected by heat islands outdoors walking or recreating, or in buildings lacking cooling when extreme heat events occur. Well-shaded neighborhoods can be more than 10 degrees cooler than poorly shaded ones (Institute for Climate, Water, and the Environment, 2022). As is the case in many cities around the country, this burden of higher temperatures tends to fall on the more vulnerable populations within Spokane (**Exhibit 3.4-23**).

Exhibit 3.4-23. Land Surface Temperature and Census Blocks with Very High Vulnerability



Source: LANDSAT-8; BERK, 2025.

Summary of Affected Environment

This section provided an overview of the city's current land use and zoning framework, detailing key policies and regulations that shape the urban form. It also offered a description of existing land use conditions, illustrating how these regulations influence the city's development patterns.

Spokane's current land use framework focuses new development in designated Centers and Corridors to encourage mixed-use, higher-density, walkable communities near jobs, services, and transit. Outside these areas, residential neighborhoods will develop more gradually. The City uses subarea and neighborhood plans to guide localized growth and revitalization.

Spokane's land use is primarily residential (55%), divided into low, moderate, and high intensity zones, with commercial (10%), industrial (19%), institutional (3%), and open space (12%) making up the rest. Commercial and higher-density development is concentrated downtown and along major corridors, while industrial uses cluster near rivers, rail lines, and other key transportation hubs. The City's zoning code divides land into Residential, Commercial, Downtown, Industrial, and Centers and Corridors districts, each with specific regulations on use, density, and development standards. Overlay districts address special protections like river views and adult business locations.

Spokane's urban form regulations guide building heights, setbacks, and design to ensure new development complements surrounding areas. Taller buildings are allowed mainly in higher-intensity zones, with design features to create an appealing skyline. Transition zones help blend different intensity areas. The City prioritizes enhancing the tree canopy for environmental and climate benefits, especially in vulnerable areas.

Spokane, founded in 1873 and incorporated in 1881 was historically shaped by the railroad and mining booms. It has grown into a key commercial and transportation hub in the Inland Empire. Its urban development reflects a mix of historic downtown architecture, early 20th-century neighborhoods with streetcar-era buildings, and newer suburban-style housing on the outskirts. Despite the current housing crunch, Spokane has substantial vacant and underutilized land, capable of supporting future growth within city limits.

Culturally, the Spokane Tribe's ancestral lands encompass the region, and the city regulates development to protect significant archaeological and historic resources. Spokane has eighteen historic districts and over 400 designated local historic sites, reflecting its rich heritage and ongoing preservation efforts.

Environmental justice in Spokane focuses on fair treatment and meaningful involvement of all people, especially vulnerable communities, in environmental decisions, aiming to address disproportionate impacts and ensure equitable resource distribution.

The city faces noise pollution mainly near the airport, highways, and rail lines. Light pollution and shadows from buildings and trees affect residents and scenic views, prompting policies to protect solar access and important vistas. Spokane also contends with the urban heat island effect, which disproportionately affects vulnerable neighborhoods.

3.4.2 Impacts

Local land development patterns and zoning policies fundamentally affect many of the critical factors that shape the form and features of Spokane and the neighborhoods within, directly affecting people's access to housing, jobs, schools, open space, public services, transportation, and experience of place. Overly restrictive land use regulations can also narrow economic opportunities for workers or encourage expansion outward, increasing travel by car and greenhouse gas emissions (GHGs). This section focuses on the potential impacts—including equity and climate vulnerability considerations—of changes in land use patterns, permitted uses, or development intensities. Impacts are discussed based on the following categories:

- **Land use compatibility:** Changes in use type between adjacent areas and any likely incompatibility. Land use incompatibility could be related to health and safety (such as noise levels), activity levels at various times of day/night, or conflicting movement patterns
- **Urban form compatibility:** Changes in building form, scale, massing, or spatial organization between adjacent areas and any likely incompatibility. Urban form incompatibility may involve abrupt transitions in building height or bulk, inconsistent setbacks, or street wall continuity, or mismatched public realm design that result in visual disruption, diminished walkability, overshadowing of public spaces, or a lack of coherent neighborhood identity.
- **Cultural Resources:** Loss, alteration, or damage of archaeological, cultural, and historical resources and sites due to growth allowed by alternatives.
- **Environmental Justice:** Land use or urban form changes that disproportionately impact historically marginalized or underserved communities with environmental, health, or socioeconomic burdens. This includes increased exposure to light or noise pollution, environmental hazards, or urban heat island effects, especially in areas with high environmental health disparities, sensitive populations, and limited tree canopy, vegetation, or public open space.

Impacts Common to All Alternatives

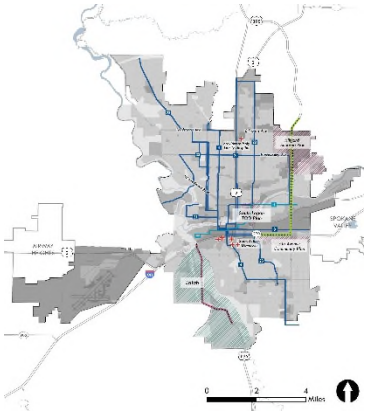
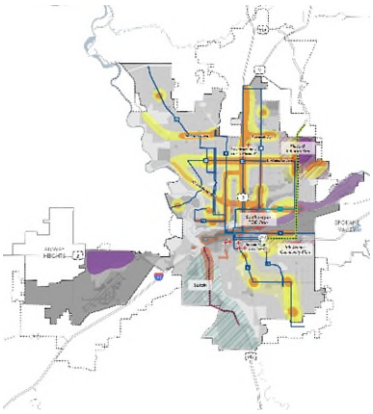
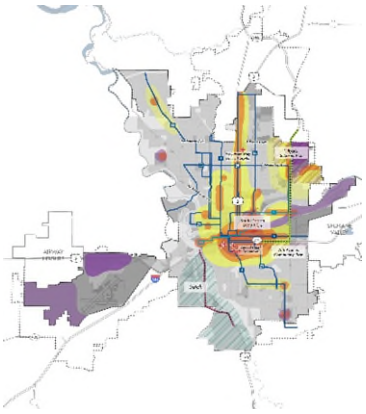
The alternatives primarily differ in how growth is distributed and intensified across the city, as well as in their projected land use patterns. The pace and location of future development would be shaped by factors such as the implementation of Comprehensive Plan policies, related regulations and actions, and decisions made by individual property owners and developers.

In general, all alternatives concentrate the highest levels of future growth in centers, corridors, and commercial and industrial/employment areas that already feature higher intensities, a more diverse mix of uses, and greater access to frequent transit. Outside these hubs, growth is directed toward low- to moderate-intensity housing and neighborhood-scale commercial development in designated locations. Each alternative assumes mixed-use growth in Center City, with additional varying levels of mixed-use development along Division Street (northern spine) and South Regal Street between the Lincoln Heights and Southgate centers. All alternatives also anticipate some industrial growth in Northeast Spokane (Hillyard area) and the West Plains near the airport.

Land Use Patterns and Compatibility

Growth across all alternatives—housing, commercial, industrial, and mixed-use— will spur new development and redevelopment citywide. Across all alternatives, more diverse land uses will locate near each other, increasing mixed-use patterns within activity hubs, centers, corridors, and, to varying degrees, other parts of the city. **Exhibit 3.4-24** shows a comparison of future land use intensity, based on the designated amount of land, for each alternative. While the Comprehensive Plan encourages mixing uses in centers and corridors, some adjacencies could potentially cause adverse compatibility impacts on less intense uses. Over time, infill and redevelopment will raise development intensity in areas not yet built to full zoning capacity. The extent of these conflicts varies by alternative and would continue to be mitigated through the application of existing development regulations.

Exhibit 3.4-24. Future Land Use Intensity Qualitative Comparison

	Alternative 1: No Action	Alternative 2: Distributed and Balanced	Alternative 3: Center City and Regional Hubs
			
Low Intensity Residential	Higher	Moderate	Moderate
High Intensity Residential	Lower	Moderate	Moderate - Corridors Higher – Center City
Mixed-use/ Commercial	Lower	Moderate	Moderate - Corridors Higher – Center City
Industrial	Lower	Moderate	Higher
Open Space	Moderate	Moderate	Moderate

Source: BERK, 2025.

Under Alternatives 2 and 3, new mixed-use development could replace areas originally zoned for a single use. This would occur in Northwest, Northeast, and South Spokane study areas. See **Exhibit 3.4-25**. Greater mixing of uses can increase localized spillover effects, such as noise, particularly in Downtown and other urban centers and corridors. While not unusual in these areas, such impacts remain a potential adverse effect of future growth. They can be mitigated through land use policies that provide transitions in intensity, apply use restrictions, and separate incompatible zones, as well as through continued enforcement of noise, nuisance, and public safety codes.

In Alternatives 2 and 3, the Northeast study area is assumed to transition from primarily industrial uses to a blend of industrial, mixed-use development, and high- to moderate-intensity residential neighborhoods. This shift could bring a range of potential impacts, such as increased traffic and freight movement, changes in neighborhood identity, greater demand for infrastructure and public services, and possible land use conflicts where residential areas meet active industrial sites. At the same time, the mix of uses could create opportunities for new jobs, improved amenities, and more housing choices within walking distance of employment centers. See additional study area comparisons in **Exhibit 3.4-25**.

Exhibit 3.4-25. Land Use Summary Evaluation by Area

Area	Alternative 1: No Action	Alternative 2	Alternative 3
Northwest Spokane	Continue as planned More growth on vacant land in North Indian Trails. Medium and high residential intensities and commercial uses along some corridors. Middle housing in Residential Low areas.	Residential moderate to high, mixed-use zones extending northwest and east-west along corridors/frequent transit routes.	Residential moderate to high concentrated in southeast area nearer to Central City/Downtown core; some residential moderate and mixed-use distributed along N Indian Trail Rd.
Northeast Spokane	Continue as planned Redevelopment potential in some corridors and centers. Middle housing in Residential Low areas.	Residential moderate to high, mixed-use zones extending north and east-west along corridors/ frequent transit routes. Residential moderate to high and mixed-use around edges of Hillyard area. Industrial focused on upper northeast.	Residential high and mixed-use concentrated on Division St. Residential moderate to high and mixed-use around edges of Hillyard area. Industrial focused on upper northeast.

Area	Alternative 1: No Action	Alternative 2	Alternative 3
Center City	Continue as planned. Downtown would have unlimited heights per interim regulations. South Logan Subarea Plan not included in growth estimates.	Residential high and mixed-use distributed beyond just the downtown core.	Intense clustering of high and moderate-high growth with strong focus on mixed-use and housing on surrounding neighborhoods and along Division Street.
South Spokane	Continue as planned. More growth in Latah/Hangman neighborhood on vacant land. Redevelopment potential in some corridors and centers. Middle housing in Residential Low areas.	Moderate-to-high residential spread further south along South Regal St; mixed-use focus on designated centers: Grand District, Lincoln Heights, South Gate, 57th & Regal. More growth in Latah/Hangman neighborhood on vacant land.	More limited spread south; growth stays nearer the city center, with fewer outer high-intensity zones. More growth in Latah/Hangman neighborhood on vacant land.
West Plains	Continue as planned.	Industrial heavy concentration north of the airport; residential uses are minimal, prioritizing employment/industrial functions.	Expanded industrial concentration to southwest of airport; residential uses are minimal, prioritizing employment/industrial functions.

Sources: BERK, 2025.

Urban Form

Height, Bulk, & Scale

Future growth and development directed into existing centers, corridors, and employment/industrial hubs under all alternatives would result in a moderate amount of additional height and bulk in these commercial, mixed-use nodes. The overall height, bulk, and scale implications from such development would likely be consistent with that experienced over the last 20 years. Residential areas will see limited changes to height, but more development of middle housing types and accessory dwelling units (ADUs) will add more buildings to these areas.

Transitions

Across all alternatives, redevelopment will likely bring larger buildings to replace smaller ones – especially in urban centers, along major streets, near frequent transit, and in mixed-use or industrial areas. In some neighborhoods, this could mean noticeable changes, such as apartments or middle housing being built next to smaller-scale or single-unit homes.

These changes can also create sharper boundaries between different types of areas. Centers and corridors often have a mix of zones (CC1, 2, 3 and 4) and building types, and in Alternatives 2 and 3, growth is expected along their edges. While these areas may eventually blend together more smoothly, in the short term the contrast between low density neighborhoods and busier, more developed centers may become more pronounced.

In Alternatives 2 and 3, Northeast Spokane is envisioned to transition from primarily industrial uses to a mix of industrial, mixed-use, and high- to moderate-intensity residential development. Here, transitions would involve not only changes in building height and intensity but also shifts in land use. Careful planning through setbacks, buffers, streetscape design, and pedestrian connections would be needed to ensure these transitions are gradual and functional, minimizing conflicts while supporting a cohesive, mixed-use neighborhood.

Tree Canopy

Bulkier development under all alternatives would likely displace some trees on private property, especially in residential zones. At the same time, the number of street trees may increase where they are required with redevelopment.

Shadows

Under any alternative, redevelopment will generally be taller and bulkier than the existing buildings. Taller buildings cast longer shadows, and bulkier buildings cast wider shadows. A combination of tall and wide can mean large areas become shaded during much or all of the day. Building shadows in dense urban areas offer public health benefits that have often been overlooked in livability discussions. Shading can reduce UV exposure, a leading cause of skin cancer, and mitigate the urban heat island effect by cooling public spaces, promoting comfort, and encouraging outdoor activity. However, excessive overshadowing can reduce natural light in adjacent buildings, increasing energy use to maintain comfortable indoor temperatures. Furthermore, more shadows can result in icy roads and sidewalks remaining slippery for longer after snow events and in the spring/fall when mixed weather can cause traction issues. Balancing urban density with access to sunlight is essential to support healthy, vibrant public and private spaces.

Views

Taller, larger buildings are expected in all alternatives, which could change some scenic views. This is likely in both Alternatives 2 and 3, where new development in the northwestern part of the Center City study area may impact ground-level views of the Spokane River Gorge and Downtown Spokane from

the north side of the river. Current rules in the North River Overlay District aim to preserve these vistas.

Cultural Resources

Under all alternatives there is a potential to disturb archaeological resources during construction given the extensive very high- and high-risk areas throughout most of the city, especially in the Northwest, Northeast, Center City, and Division study areas, as well as the Latah/Hangman portion of the South study area. Regardless of alternative, growth may occur throughout the city and affect cultural resources (except in critical areas such as wetlands, stream corridors, and priority habitats). Such impacts can include physical alteration, damage, or destruction of all or part of a resource; alteration of the characteristics of the surrounding environment that contribute to the property's significance; and the introduction of visual or audible elements that are incompatible with the property.

Under all alternatives, development of different scales or design may affect designated historic properties and those that are greater than 45 years old or those sites that are eligible for listing as a historic resource but not yet listed. All alternatives propose similar residential development to meet growth targets but alternatives 2 and 3 focus growth at greater intensities in corridors and centers where there is a potential to alter historic sites and structures, although it could decrease pressure for development in "greenfield" areas where undisturbed cultural resources may be found.

Environmental Justice

The alternatives vary in their proposed concentration of growth in areas vulnerable to climate risks or in their level of opportunity to incorporate additional climate resilience strategies. Alternative 2 maintains the existing network of centers and corridors and encourages greater integration of mixed-use development and commercial activities along transit-rich corridors. Its emphasis on service-rich neighborhoods and neighborhood-oriented nodes helps distribute growth more evenly across the city, which may reduce concentrated noise, light pollution, and localized heat island effects, while also allowing for smaller-scale, community-driven climate adaptation strategies. In turn, Alternative 3 directs most of the new housing, mixed-use development, and job growth toward major hubs, particularly Center City and the University District as well as West Plains and Hillyard. This targeted approach to development creates opportunities for large-scale infrastructure investments and energy-efficient design, but it may also concentrate environmental stressors in specific areas unless carefully mitigated.

North Spokane Corridor (US 395)

Northeast Spokane contains a significant concentration of industrial uses. It is also home to Spokane Community College and features a range of housing types, from mixed-use development to low intensity suburban housing. The ongoing construction of the North Spokane Corridor (US 395) has already displaced a number of residents, businesses, and industrial operations. Once completed in 2030, the corridor is expected to significantly reshape travel and freight distribution patterns throughout the region. Designed as a multimodal freeway, the corridor will include transit, bicycle, and pedestrian facilities alongside vehicle lanes.

The project is likely to introduce several environmental impacts to surrounding neighborhoods. Increased vehicle traffic, especially freight, may elevate noise levels, affecting nearby residential areas. New roadway lighting could contribute to light pollution, impacting visibility of the night sky and altering nighttime conditions for nearby homes. Additionally, the expansion of paved surfaces may lead to localized heat island effects.

This project presents an opportunity to proactively plan for land use compatibility and long-term community development. Both Alternative 2 and Alternative 3 envision continued industrial uses in the upper northeast area, surrounded by moderate- to high intensity residential and mixed-use zones. Thoughtful planning will be essential to ensure that these uses can coexist in a way that supports both economic growth and neighborhood livability.

Division Bus Rapid Transit (BRT)

Division Bus Rapid Transit (BRT) is planned for launch between 2027 and 2029. It will expand existing bus service between downtown Spokane and north Spokane and Spokane County. While the project will enhance mobility and reduce car dependency, potentially lowering regional noise and emissions, it may also bring localized increases in noise, light, and heat in areas of intensified development along the corridor.

Alternative 1: No Action, Stay the Course

The City of Spokane's growth patterns and development intensity would continue as currently planned, following existing land use regulations and policies, which already direct higher-intensity housing toward designated Centers and Corridors, as well as the Downtown core/Center City area. Employment growth would continue in the Downtown area and in industrial zones located along major rail lines and near Spokane International Airport.

Based on the comparison of alternatives under Impacts Common to All Alternatives, the potential for impacts under Alternative 1 is summarized below:

- **Land use compatibility:** Development continues under existing zoning; minimal new conflicts between adjacent land uses.
- **Urban form compatibility:** Existing scale and form patterns would be maintained; abrupt transitions may continue where high-density Centers meet lower-density neighborhoods. There would be more limited improvements in street connectivity, sidewalks, or public realm design.
- **Cultural Resources:** Growth could occur throughout the city, and there is potential to disturb cultural resources during construction. Alternative 1 proposes similar total growth as other alternatives, but focuses more growth in areas in outer neighborhoods such as North Indian Trail as well as in centers and corridors. It would not increase the capacity for development and may have less pressure on historic sites since it has less intensity planned along corridors with existing development built more than 45 years ago. However, since more development is focused in low density areas there may be a greater risk that undisturbed cultural resources may be found.

- **Environmental Justice:** Historically underserved communities may continue facing unequal access to amenities, transit, or services (see also **Section 3.5**). Existing environmental burdens, such as noise or light near development intense or industrial zones. This could be lessened with current transitional standards but may occur to a greater degree than other alternatives.

Alternative 2: Distributed and Balanced

Alternative 2 maintains the existing network of centers and corridors but better connects them by encouraging greater integration of mixed-use development and commercial activities along transit-rich corridors. This approach responds to community interest in creating more walkable, service-rich neighborhoods by introducing small-scale, neighborhood-oriented retail nodes in strategic locations, guided by specific locational criteria. Some centers connected by transit could evolve into corridor development. These retail and mixed-use hubs would strengthen connections between residential areas, transit stops, and commercial destinations, enhancing both accessibility and quality of life. Additional discussion of impacts under Alternative 2 includes:

- **Land use compatibility:** Generally balanced development reduces large-scale incompatibility by spreading growth in existing centers and corridors, and employment hubs. Introduction of small-scale, neighborhood-oriented retail nodes may create localized activity conflicts in some residential areas (noise, traffic).
- **Urban form compatibility:** Gradual densification along transit-rich corridors may introduce changes in building height or scale that contrast with existing low-density neighborhoods. Improved street-level design and pedestrian infrastructure can enhance visual coherence and walkability.
- **Cultural Resources:** Alternative 2 has similar residential growth and less job growth compared to Alternative 1. Alternative 2 increases the capacity for more housing types, and there is potential for localized impacts if new mixed-use nodes or corridors overlap with sensitive historic or cultural sites. With less pressure to develop in lower density areas compared to Alternative 1, there could be less potential risk to undisturbed cultural resources under Alternative 2. Impacts can be mitigated by advanced review and application of historic and cultural resources policies and regulations.
- **Environmental Justice:** More population could be located along corridors that may have transportation noise and there could be more urban streetscapes with less tree canopy. However, there is an opportunity to increase landscaping, tree canopy, and shade structures with new development and along street frontages. The broader distribution of mixed-use development and services may improve access for historically underserved communities (see also **Section 3.5**). Alternative 2 could reduce environmental burdens by encouraging transit use and shorter trips, mitigating air pollution and heat island effects. The implementation of Climate Element mitigation and adaptation policies could reduce environmental justice impacts.

Alternative 3: Center City and Regional Hubs

Alternative 3 directs most of the new housing, mixed-use development, and job growth toward major hubs – particularly within Center City and the University District. These areas would see expanded opportunities for mixed-use projects and employment centers, creating vibrant, high-activity districts. Industrial development would be concentrated in targeted zones, especially within West Plains and Northeast Spokane. This alternative also involves a more selective investment strategy, where City resources are prioritized for certain high-impact Centers and major Corridors. In some cases, designations in other areas may be removed or modified to focus growth where it will be most effective. Along prioritized corridors, new designations would encourage mixed-use development and higher-density housing. Enhanced livability such as improved streetscapes, pedestrian infrastructure, and public amenities would accompany this targeted growth. Neighborhood commercial uses would be established throughout the city, provided they meet established criteria, ensuring localized access to goods and services.

Potential impacts under Alternative 3 include:

- **Land use compatibility:** Concentration of high-intensity residential, commercial, and industrial uses may create sharp transitions between dense hubs and adjacent lower-density neighborhoods. Targeted corridors may see mixed-use intensification that could conflict with surrounding residential areas. Industrial intensification in some areas may conflict with surrounding areas, particularly the Northeast.
- **Urban form compatibility:** Building scale, massing, and intensity would be located in major hubs; abrupt transitions are possible at edges of priority growth areas. High-quality public realm investments can mitigate some incompatibilities within hubs, but peripheral areas may experience visual or transition disruption. There may be more intense development in Center City to the south and west compared to current uses and plans. Transitions from Center City are expected to be gradual.
- **Cultural Resources:** Growth in housing is similar to other alternatives and focused in already developed areas in Center City and selected corridors. There would be higher job growth than the other alternatives. Concentrated development pressure in Center City and Northeast in Hillyard could mean a greater potential to disturb cultural resources or pressure to alter or demolish historic buildings or districts. Incentives to encourage adaptive reuse and historic preservation regulations would be applied. With less pressure to develop in lower density areas compared to Alternative 1, there could be less potential risk to undisturbed cultural resources under Alternative 3. Impacts can be mitigated by advanced review and application of historic and cultural resources policies and regulations.
- **Environmental Justice:** Center City and Regional Hubs benefit from enhanced infrastructure, amenities, and transit access. Areas outside prioritized hubs may see limited improvements, potentially exacerbating disparities for marginalized communities. High-intensity growth could increase localized heat island effects, traffic congestion, or noise if not paired with environmental mitigation. However, Alternative 3 would apply livability and streetscape improvements. This could involve enhanced streetscape as a baseline improvement across more corridors (addresses tree canopy and extreme heat), criteria for neighborhood commercial areas to provide commercial and

civic uses in areas lacking services, noise abatement and standards, and other similar approaches to address environmental justice.

3.4.3 Mitigation Measures

Incorporated Plan Features

All alternatives would focus most future growth into the existing urban centers, corridors, and employment/industrial hubs. Compatibility challenges would not be an uncommon or new phenomenon in these areas and can be avoided or mitigated by continuing to implement the Unified Development Code.

Regulations and Commitments

Zoning and Urban Design

Spokane's municipal code contains regulations for land use and urban form. Standards address height, including transitions between more intense and less intense zones, building coverage, blank walls, roof forms, landscaping, and screening, and more. These regulations as well as existing supporting policies and programs would serve to mitigate impacts associated with the alternatives.

Noise, Light, Heating and Cooling

Chapter 10.70 Noise Control provides environmental designations for noise abatement and noise limits between different land use categories (residential, commercial, industrial).

Chapter 17G.070 Planned Unit Developments are required to have lighting with cut-off shields.

Section 10.57.170 Portable Cooling Devices indicates rental tenants are allowed to install portable cooling devices.

Cultural and Historic Resources

Federal and state laws govern the designation and protection of cultural resources, including but not limited to:

- National Historic Preservation Act (NHPA) of 1966, as amended, known as Section 106, has implementing regulations (36 CFR Part 800), that require federal agencies, or those receiving federal grants or funds, or a federal permit or license, to identify historic properties, assess adverse effects, and resolve those adverse effects.
- Archaeological Resources Protection Act (ARPA) of 1979 protects archaeological resources.
- National American Graves Protection and Repatriation Act (NAGPRA) creates protections for Native American burial sites, remains, and cultural objects.
- Washington Executive Order 21-02 (formerly 05-05) requires that impacts to cultural resources must be considered as part of any state-funded project or investment and must include

consultation with Washington State Department of Archaeology and Historic Preservation (DAHP) and with Tribal governments.

- Washington State law (RCW 27.53 and 27.44) protects archaeological resources (RCW 27.53) and Indian burial grounds and historic graves (RCW 27.44) located on both the public and private lands of the State.
- An archaeological excavation permit issued by the DAHP is required in order to disturb an archaeological site.
- Knowing disturbance of burials/graves and failure to report the location of human remains are prohibited at all times (RCW 27.44 and 68.60).

The City's Shoreline Master Program (Section 5.2.4 Historic or Archeological Impacts) includes regulations regarding stop work and studies if cultural resources are encountered:

- For any use, activity or development, the project proponent, agent, or applicant shall notify the Spokane Historic Preservation Office and the Director whenever any archaeological or historical artifacts or cultural resources are encountered during any grading or excavation. All work on the project site shall cease immediately.
- Work may resume only after the applicant, project proponent, or agent and the Spokane Historic Preservation Office, the Washington State Department of Archaeology and Historic Preservation, and appropriate Tribal entities agree in writing on measures to protect potentially affected archaeological or historic artifacts or cultural resources.

Spokane's zoning code includes Chapter 17D.100 Historic Preservation, which addresses the nomination of historic landmarks or districts. If there is a request for the demolition of an historic landmark or a contributing building located within a local historic district, the City's Historic Preservation Officer and the Spokane City/County Historic Landmarks Commission reviews the proposal against criteria. The code also contains incentives such as façade, utility, and sidewalk grants to support preservation. Section 17D.100.230 of the Spokane Municipal Code specifically addresses demolition permits for historic structures located within the downtown boundary area, National Register historic districts, and centers and corridors, which were recently incorporated into the ordinance (Spokane City/County Historic Preservation Office, 2024).

Other Potential Mitigation Measures

Land Use and Urban Design

The City could consider other actions if it wishes to proactively guide future land use and urban form conditions. In addition to the policy and regulatory changes already discussed, the City could further expand or refine these concepts through expanded development regulations and place-specific strategies such as targeted approaches for specific neighborhoods, corridors, or centers which could address unique conditions, such as industrial-to-residential transitions, mixed-use redevelopment, or preservation of scenic views and open spaces.

Cultural Resources

Advanced planning to eliminate, minimize, or avoid impacts to cultural resources would improve outcomes under all the alternatives. If elimination, minimization, or avoidance is impracticable, mitigation should be implemented by coordinating with the area's Tribes, the City as the lead agency, and all other stakeholders and consulting parties in accordance with DAHP Mitigation Options and Documentation Standards and the City of Spokane's Historic Preservation code.

The City could apply similar cultural resources policies and regulations found in the Shoreline Master Program to the full city limits.

The City could develop a "decision tree" for below-ground cultural resources to determine the appropriate level of investigation and, if necessary, mitigation; see the example in **Exhibit 3.4-26**. Even when available information suggests a low probability of encountering cultural resources, it is never possible to guarantee they will not be encountered during project activities; therefore, the standard inadvertent discovery language (SIDL) should be followed per RCW 27.44 and 27.53.

Exhibit 3.4-26. Above Ground Cultural Resources Department of Archaeology and Historic Preservation (DAHP) Predictive Model and Summary Survey Recommendations

Risk Category	Minimum Evaluation
Low	Standard inadvertent discovery language (SIDL)
Moderately Low and Moderate	Desktop Review and SIDL
High and Very High	Survey and SIDL

Environmental Justice

Noise

To limit the impacts of temporary construction noise, in addition to restrictions on the hours of construction, other mitigation that could be applied includes:

- Installing barriers to shield noise sensitive receptors and enclosing stationary work.
- Selecting haul routes to avoid noise sensitive areas.
- Using alternative methods to pile-driving.
- Using fully baffled compressors or electric compressors.
- Using fully mufflered construction equipment.

Where there are new residential uses near noise sources such as highways, the City could require noise reduction standards in residential buildings where exterior noise levels greater than 65 dBA are likely to occur or where other uses occupying the same structure would likely contribute to excessive noise levels (above 45 dBA) within residences. These standards could include:

- Municipal code provisions to ensure interior noise levels for all buildings/land use types are within acceptable standards.
- Noise studies/mitigation for all development where the projected exterior noise levels exceed the City's allowable noise standards, to the extent feasible.
- Building standards or retrofits such as installation of acoustically rated windows and doors, installation of additional wall and attic/roof insulation, and installation of dampers and baffles on exterior vents, flues, and chimneys.
- Adopt goals or policies with site planning/design techniques to help guide land use planning decisions and encourage proper design for future developments. Such techniques may include, but are not limited to, the following:
  - Increase the distance from the road to the extent feasible, depending on road classification, while supporting walkability and encouraging neighborhood connectivity.
  - Place noise compatible land uses such as landscaping areas, maintenance facilities, and utility areas between the road and the residences or noise-sensitive uses.
  - Use buildings or berms as noise shields by locating them parallel to the road(Note, this is an effective strategy for roads but is ineffective from aircraft noise). Soundproof the building if it contains residences.
  - Locate residences in topographically low points that are naturally low noise pockets if they exist.
  - Orient the residences—and spaces within the building that benefit from quieter volumes (bedrooms and living rooms)—away from the noise.
  - Use cluster and planned unit development techniques to accomplish combinations of the above. However, these techniques have limited to no effect on noise originating from aircraft overhead.

The City should advocate for and coordinate with WSDOT on noise abatement and mitigation where major highways bisect and disrupt residential areas to advance environmental justice outcomes.

Noise from tire-pavement interactions is a dominant contributor to roadway noise. A long-term mitigation program to reduce noise in noise-sensitive areas within the study areas would be to install noise reducing pavement on major arterials and roadways that experience relatively high traffic volumes and speeds.

Light and Glare, Shade and Shadow

The following approaches could be taken with development regulation updates:

- Consider implementation of additional development standards to address maximum height of exterior illumination.
- Address placement, light output, direction, and shielding of any exterior illumination above a given height to reduce light and glare emissions to sensitive areas.
- Condition development near parks and open spaces or key pedestrian corridors with a combination of the following measures to reduce shading effects:

- Height limits within a specified distance of the public space or shade and shadow analysis that demonstrate the preservation of sunlight in public spaces during peak periods of use.
- Separation of high-rise building massing.
- Maximum floorplate size.
- Modification of high-rise tower location and orientation upper-level stepbacks.
- Floorplate reductions.

Heat Island

The Climate Risk and Vulnerability Assessment identified adaptation and mitigation measures to improve resilience to extreme heat. Some measures recognize the balance of adding trees for shade while also managing for wildfire risk.

- Invest in green infrastructure to reduce the impacts of extreme heat.
- Invest in Tribal and cultural infrastructure to improve climate resilience.
- Enhance community gathering places as resilience hubs.
- Protect and adapt Spokane's parks, open spaces, and shorelines.
- Expand and manage the City of Spokane's tree canopy for cooling and air quality.
- Retrofit existing buildings for cooling, air filtration, and energy conservation.
- Incentivize or require green and cool roofs to reduce building temperatures and cool pavement in place of conventional dark pavements.
- Prioritize tree canopy, cool corridors, and built shade installation on streets, public lands, and public and private parking lots.
- Improve site and building design and install treed buffers along highways and roadways to improve local air quality.
- Improve wildfire protection plans with more accurate risk maps, enhanced codes, and right tree, right place concepts.

3.4.4 Significant Unavoidable Adverse Impacts

Land Use, Urban Form, Environmental Justice

Over time, Spokane is expected to experience continued growth, with development gradually becoming more intense in terms of height, bulk, and scale under all alternatives. This shift from lower-intensity to higher-intensity development is a natural and expected outcome of urban population and employment growth. No significant, unavoidable adverse impacts on land use patterns, compatibility, or overall urban form are anticipated under any alternative.

Future growth is likely to result in temporary or localized land use impacts as development occurs. More growth could occur in proximity to noise sources or light and glare sources and in areas where there are heat island effects. The potential impacts related to these changes may differ in intensity and location in each of the alternatives and many are expected to resolve over time. Application of the

City's adopted or new development regulations and zoning requirements, including climate mitigation and adaptation measures, are anticipated to sufficiently mitigate these impacts.

Cultural Resources

All the alternatives have the potential for significant adverse impacts to cultural resources in the analysis areas. Proactive consideration of impacts to cultural resources results in more effective identification, planning, and protection than reactive responses to inadvertent discoveries during project implementation. A well-designed and implemented pre-project cultural resource review process is the most effective way to avoid, minimize, or mitigate adverse impacts.

3.5 Population, Employment, and Housing

This section addresses the City of Spokane's population and demographic characteristics, housing types and numbers, and employment types and numbers. The thresholds of significance in this section include:

- **Capacity for Housing and Population:**
  - Ability of the alternative to provide sufficient buildable land capacity for population and housing.
- **Housing Variety and Affordability:**
  - Ability to increase the supply, diversity, and affordability of market-rate housing.
  - Ability to increase the supply of income-restricted housing.
  - Regulatory barriers to and insufficient capacity for production of affordable units needed (in line with City's role / requirements under HB 1220).
  - Ability to meet transit-oriented development requirements, or exemption requirements, in proximity to bus rapid transit stations per state legislation.
- **Equity & Disparate Impacts:**
  - Amount of new housing in areas with high displacement risk.
  - Projected loss of homes due to demolition in high displacement risk areas.
  - Amount of new housing in connected and accessible neighborhoods (transit, libraries, parks).
  - Potential for job or business displacement for employment uses located within medium/high intensity residential or mixed-use designated areas.
- **Employment:**
  - Ability to adversely affect citywide Jobs/Housing balance.
  - Job types and quantity and ability to advance City and regional economic development strategies.

Other EIS sections address the compatibility of existing and future households near air pollution and noise sources, respectively **Sections 3.2 Air Quality and Greenhouse Gas Emissions** and **3.4 Land Use Patterns and Urban Form**. In addition, the increase in growth in areas with social disparities and demand for public services is addressed in **Section 3.8 Public Services**.

3.5.1 Affected Environment

Citywide

Population and Households

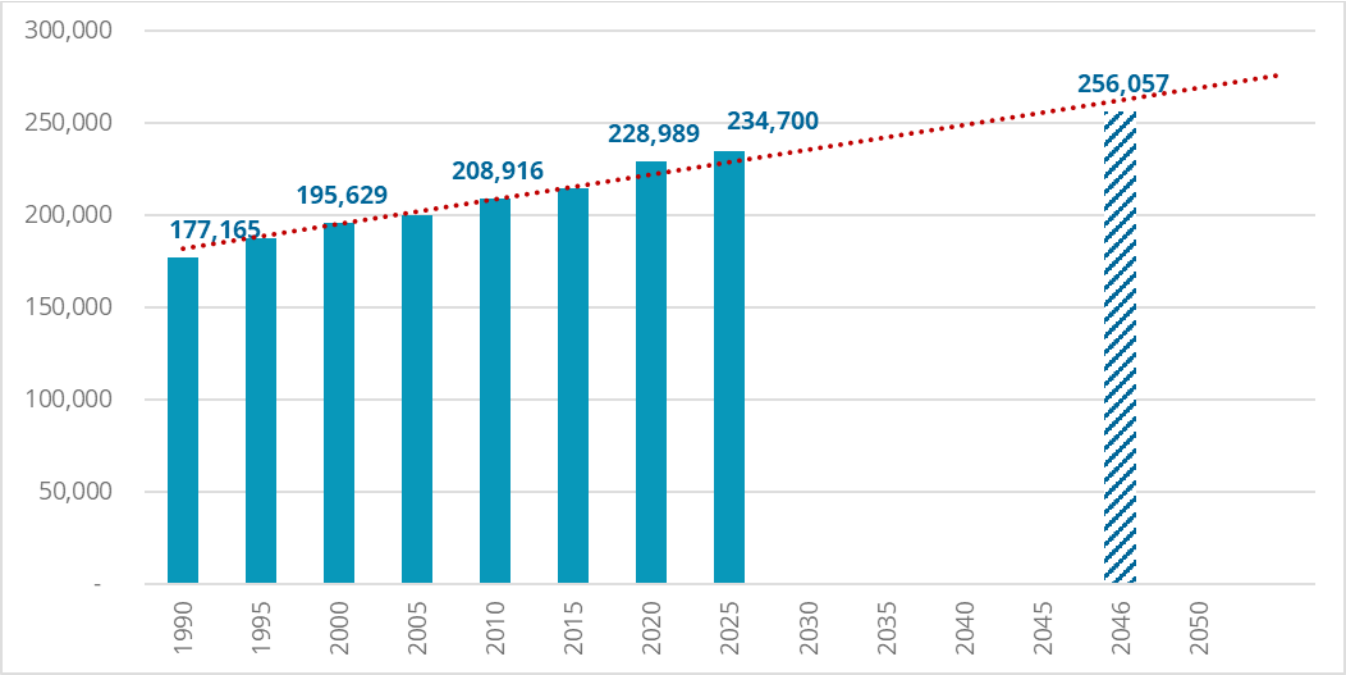
Population Growth Trends

Prior to white settlement, the Spokane area was home to the Spokane Tribe of Indians' ancestors. The Spokane and Columbia River corridors and the tributaries in much of northeastern Washington were places for Tribal hunting, fishing, and gathering. During salmon runs, other tribes joined the Spokanes at the falls for fishing, trade, games, celebration, and socializing. See also **Section 3.4.1 Affected Environment, Cultural Resources**.

The City of Spokane incorporated in 1881 with a population of around 350 but by the 1890 U.S. Census it had a population of 19,922. In 2025, it is the second largest city in the state. Recent population growth shows that from 1990-2025 the city grew at a rate of 0.8%. The city is expected to grow 9.1% between 2025 and 2046. The population target growth between 2023 and 2046 is 23,357 people, an annual growth rate of 0.4%. (Steering Committee of Elected Officials, 2024) See **Exhibit 3.5-1**.

More description of the population target is found in **Chapter 2**, **Section 2.2.3**.

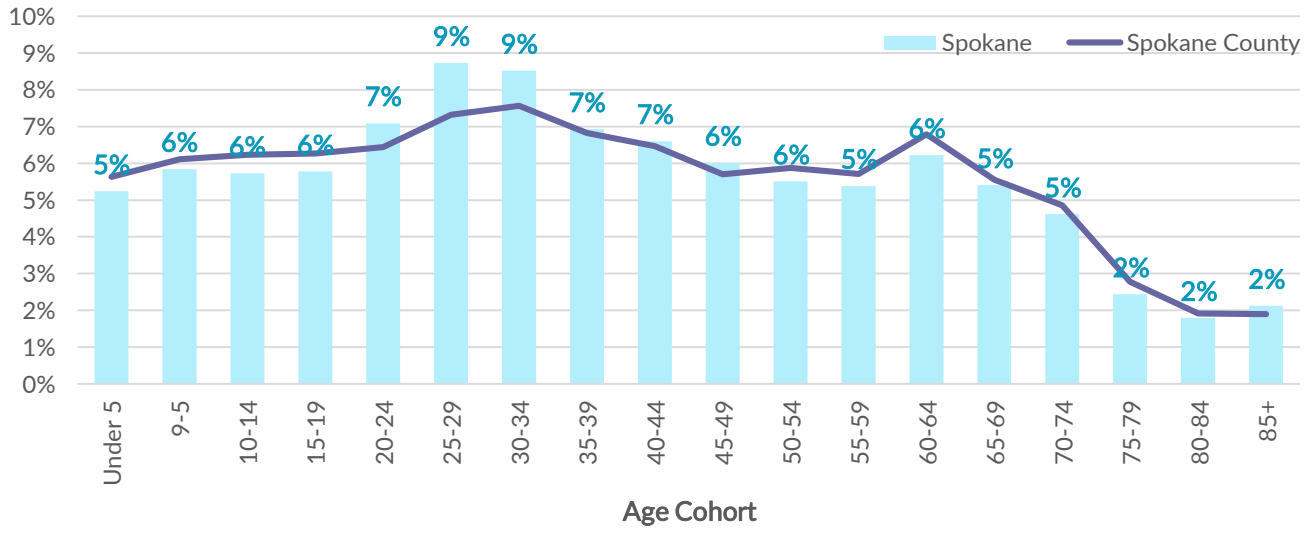
Exhibit 3.5-1. Population Growth 1990-2025 and Future Growth to 2046



Sources: OFM 2025; BERK 2025.

Likely due to the number of universities, the city has a relatively larger number of young adults compared to the county; otherwise, the city has similar shares of ages. See **Exhibit 3.5-2**.

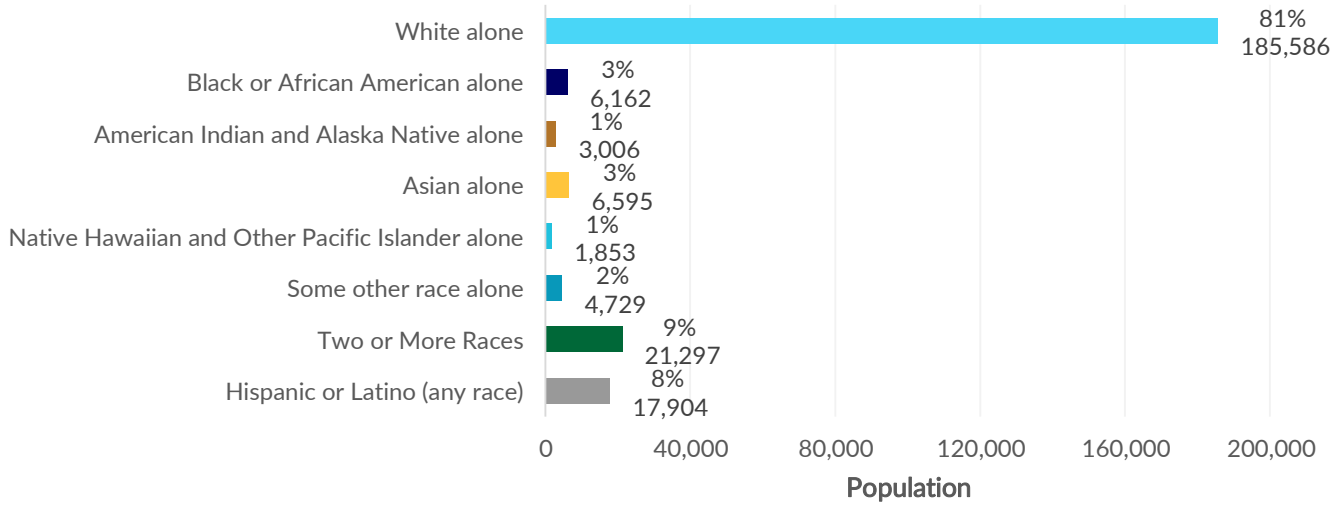
Exhibit 3.5-2. Age Structure, City of Spokane + County Comparison (ACS S0101) 2019-2023



Source: U.S. Census Bureau, 2019-2023 American Community Survey 5-Year Estimates.

The population is majority white population but has a slightly higher share of non-white residents than the county as a whole. See **Exhibit 3.4-23.**

Exhibit 3.5-3. Race and Ethnicity – City of Spokane (2019-2023)



Source: U.S. Census Bureau, 2019-2023 American Community Survey 5-Year Estimates.

Household Characteristics

Citywide

Approximately two thirds of Spokane's occupied housing stock is single-unit and one third is multi-unit. Multi-unit housing is typically 5+ housing units or greater per building, and less frequently duplexes, triplexes, and fourplexes. Household sizes typically vary by dwelling type, with higher persons per household in single-unit dwellings and lower persons per household in attached dwellings. See **Exhibit 3.5-4**.

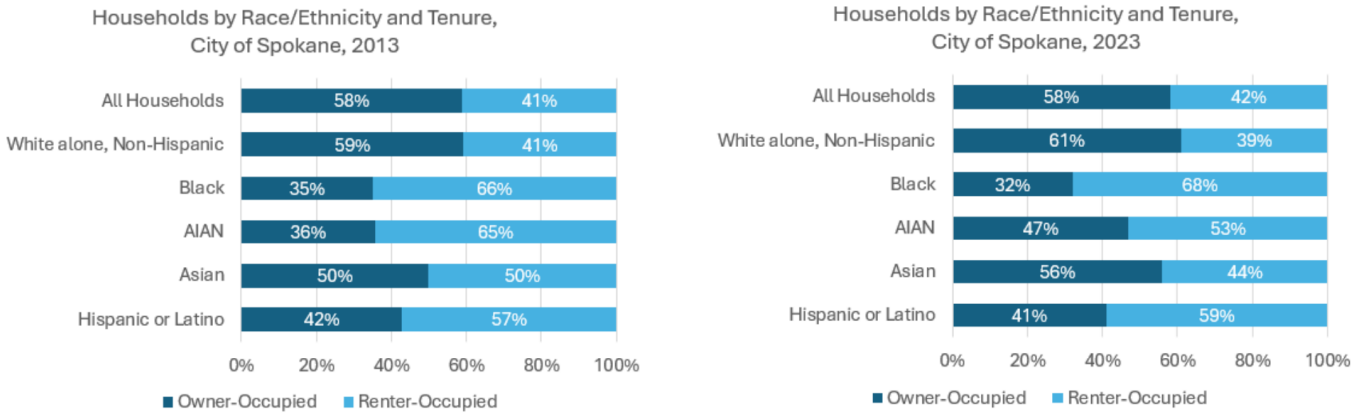
Exhibit 3.5-4. Persons per Household 2022

Unit Type	Housing Units (2022)	Persons Per Household (2022)
Occupied Housing Units, All Types	95,604	2.33
Occupied Frame Housing*	94,053	2.34
Single-Unit Detached	62,651 (67%)	2.64
Multi-Unit**	31,402 (33%)	1.74
Duplex	4,109 (4% of multi-unit)	2.30
Triplex and Fourplex	4,200 (4% of multi-unit)	2.01
Five+ Unit	23,093 (25% of multi-unit)	1.59

* Structures built on-site of wood/brick construction or modular homes.
** Single family-attached structures such as row homes, townhouses and condominiums are categorized as multi-unit structures based on the total number of units.
Source: OFM, 2024.

Homeownership rates remained consistent at 57% owner-occupied and 43% renter-occupied for all households in the City of Spokane between 2013 and 2023. Homeownership rates increased for all racial groups since 2013 except for Black households and Hispanic and Latino households, which decreased by 3% and 2%, respectively. See **Exhibit 3.5-5**.

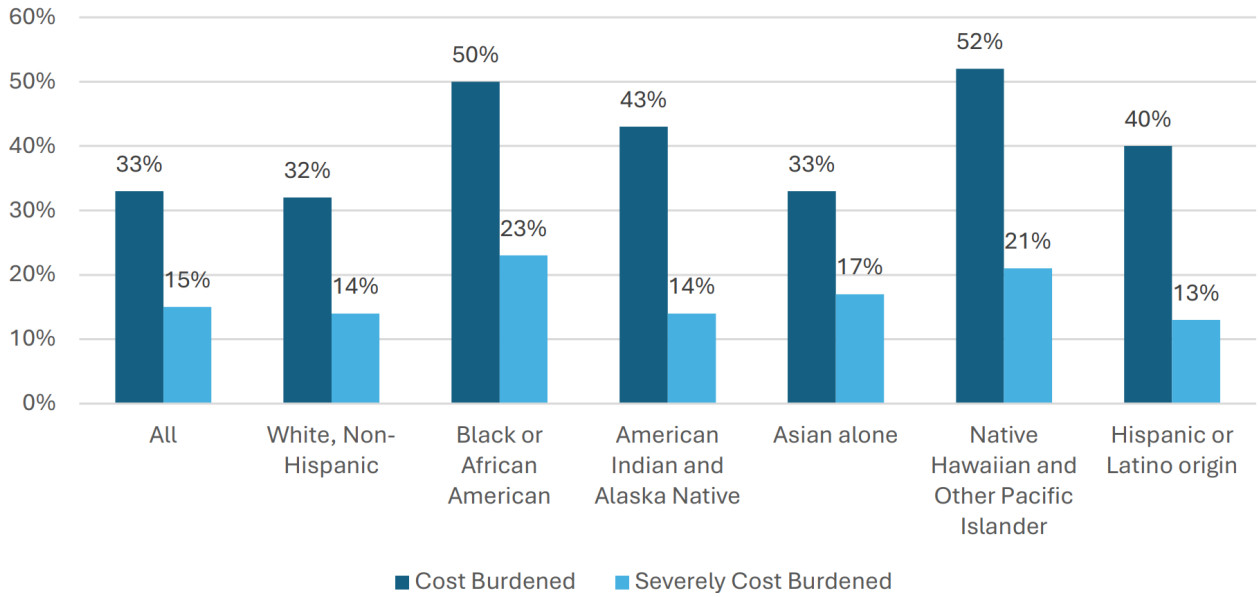
Exhibit 3.5-5. Citywide Proportion of Households by Income and Tenure 2013 and 2023



Notes: American Indian and Alaska Native AIAN; Native Hawaiian and Other Pacific Islander households were omitted due to the margin of error in 2013 exceeding the population estimates.
Sources: U.S. Census Bureau; U.S. Department of Commerce; American Community Survey 2023: 5-Year Estimates and 2013: 5-Year Estimates, Table S2502. Published by: (City of Spokane, 2025)

Cost burden refers to households that spend more than 30% of their income on rent and utilities and who earn less than 80% of the area median income (AMI). Large shares of all renter households, at least 40%, are cost burdened, with Black and Native Hawaiian and Other Pacific Islander (NHOPI) renter households substantially more cost burdened than other racial groups. For owner-occupied and households, Hispanic and Latino and Asian households have slightly higher cost-burdened rates than other races. See **Exhibit 3.5-6**.

Exhibit 3.5-6. Cost-Burden by Race and Ethnicity and Tenure, City of Spokane, 2019-2023



Notes: American Indian and Alaska Native – AIAN, Native Hawaiian, and Other Pacific Islander - NHOPI
Sources: U.S. Census Bureau; U.S. Department of Commerce; American Community Survey, 2023: 5-Year Estimates, Table B25140. Published by: (City of Spokane, 2025)

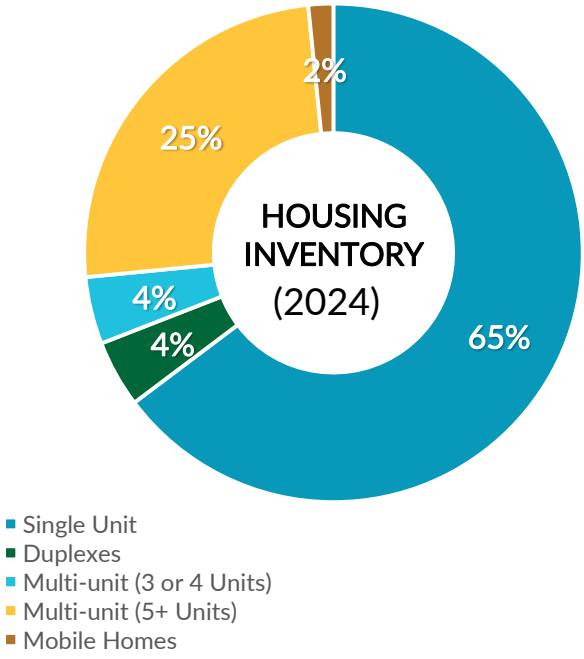
Housing

Housing Stock

Nearly two thirds of the housing stock in the city is composed of single units and about one third in multi-unit formats, typically more than five units per building. See **Exhibit 3.5-7**. Between 2013 and 2024, the city saw more multi-unit construction than single unit construction, and small amounts of duplexes and multiplexes. See **Exhibit 3.5-8**.

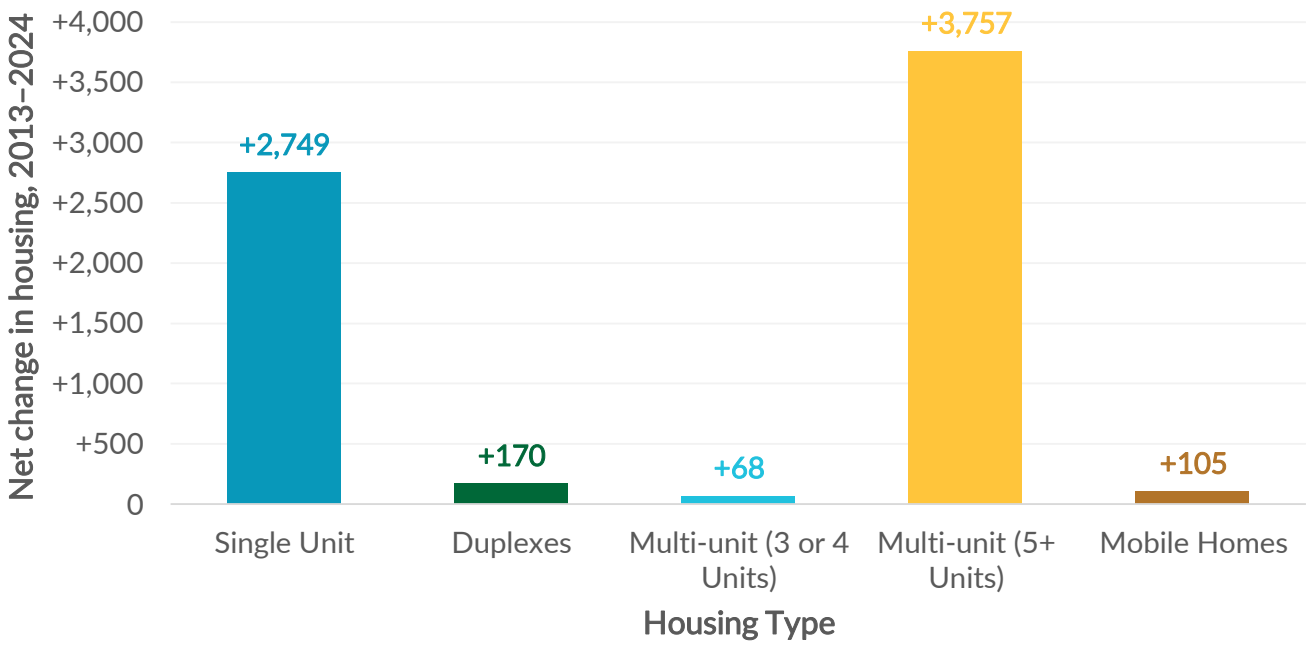
As the city has grown over time, older housing units have been replaced by newer units. However, far more units were constructed than demolished each year. Between 2010 and 2024, for every 1 housing unit demolished the city gained about 7.4 units. See **Exhibit 3.5-9**.

Exhibit 3.5-7. City of Spokane Housing Stock, April 1, 2024



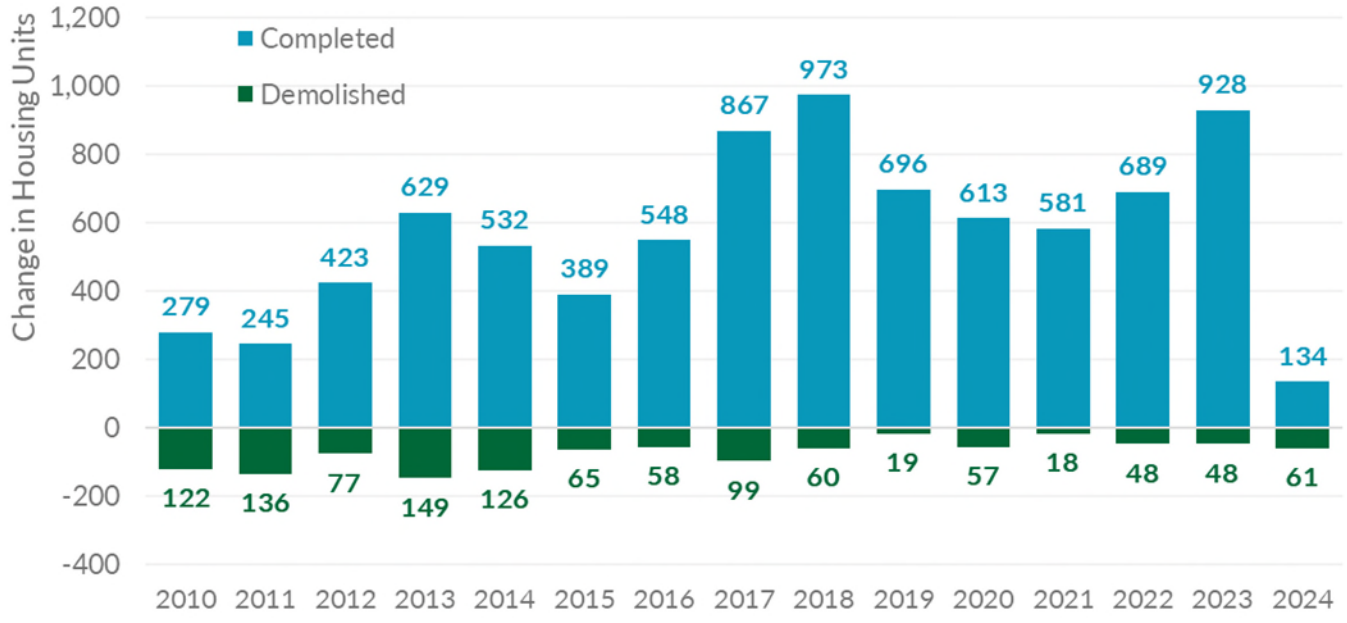
Note: OFM unit type names adjusted from single family to single unit and multi-family to multi-unit.
Sources: OFM 2024; BERK 2025.

Exhibit 3.5-8. Net Change in Housing Stock April 1,2013 to April 1,2024 (OFM)



Note: OFM unit type names adjusted from single family to single unit and multi-family to multi-unit.
Sources: OFM 2024; BERK 2025

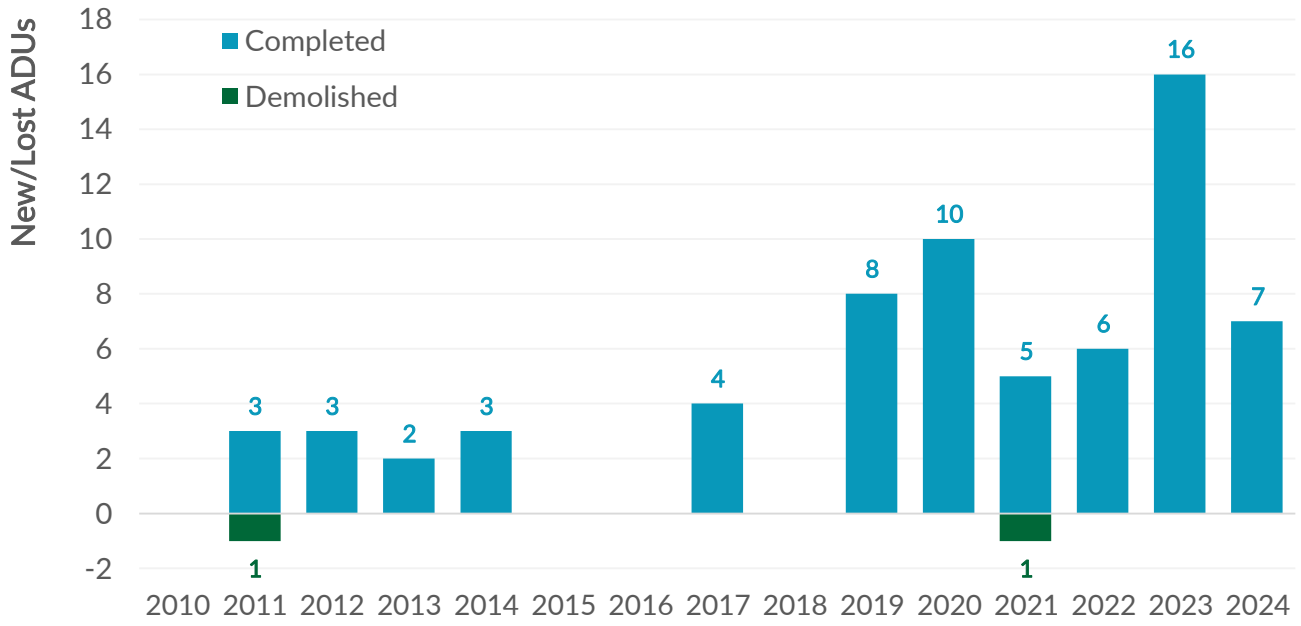
Exhibit 3.5-9. Housing Unit Completions and Demolitions – April 1, 2010 to April 1, 2024



Source: OFM 2024; BERK 2025

The city has seen limited accessory dwelling units (ADUs) being built, but a noticeable rise in accessory dwelling units were completed in the last 10 years. See **Exhibit 3.5-10**.

Exhibit 3.5-10. Accessory dwelling units completed as of April 1st of each year



Sources: OFM 2024; BERK 2025.

Housing Needs and Affordability

Housing targets for Spokane were determined based on state projections and a regional process in collaboration with other cities and Spokane County. Spokane's target includes a total of 22,359 new housing units from 2020 to 2046, as well as specific targets for each income band (see **Exhibit 3.6-2**).

Housing needs in the city were also identified in the Spokane Housing Action Plan (HAP) (City of Spokane, 2021), resulting in the following findings:

- The City of Spokane and greater region is seeing steady population and job growth. As of 2021, the HAP identified that at least 6,800 housing units are needed by 2037.
- There is an increased demand for housing for households in the moderate and middle-income ranges (80-120% AMI), that can mostly be met through single-unit attached housing. In addition, demand has increased for 2-bedroom apartments, rentals, and housing for seniors.
- Housing prices have outpaced household incomes. Based on a review of 2010-2020 data, a low vacancy rate and demand for rental and ownership housing from persons from areas with more housing wealth resulted in increases in housing prices.
- Changing household characteristics result in changing housing needs with greater elderly population (65 years +) and Millennial populations (29-44 years) likely demanding smaller sized housing as well as housing with living assistance support.

As a result of these findings, the City's strategies to meet needs included a range of activities to increase and protect affordable housing and accessibility to it. These efforts included zoning amendments to increase variety of housing types and increase densities and supply, incentive programs, partnerships, and others. In addition, the City of Spokane Community, Housing, and Human Services (CHHS) department has various programs implementing strategies. See **Exhibit 3.5-11**.

Exhibit 3.5-11. Housing Action Plan Strategies

Housing Action Plan Strategies
A. Increase housing supply, options, and affordability for all incomes.
A1. Explore and expand allowed housing types to encourage missing middle housing throughout Spokane's neighborhoods.
A2. Target efforts to increase the development of affordable housing throughout the city to support mixed-income neighborhoods.
A3. Continue to streamline and simplify changes to the City's permit process, as necessary.
A4. Leverage infrastructure and investment, including near high-performance transit stops, in Centers and Corridors, the downtown core, and other targeted areas to increase housing supply.
A5. Revise Accessory Dwelling Unit standards to allow for additional flexibility.
A6. Leverage public and partner-owned[3] land for housing, including a land bank. *
B. Preserve existing housing affordability and quality to help people thrive where they live.
B1. Expand preventative and proactive code enforcement to help maintain safe and quality housing. *
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.
B3. Enhance protections and assistance for renters, particularly the most vulnerable.
B4. Maintain and improve existing affordable rental housing.
B5. Study the local short-term rental market to reduce impact on housing affordability, neighborhood identity, and displacement.
C. Enhance equitable access to housing and homeownership.
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.

[3] The HAP described examples of partners as Spokane Public Schools and the Washington Department of Transportation.

Housing Action Plan Strategies
C2. Address racial inequities and disparities in housing. **
C3. Preserve and stabilize the viability of existing homeownership for low-income homeowners.
D. Leverage and grow partnerships to support housing initiatives across the region.
D1. Support growth management planning which best meet the Comprehensive Plan's goals and policies.
D2. Leverage partnerships within the health, education, parks, and transportation fields to support housing affordability, access to opportunity and quality of life.
D3. Grow and expand use of both local and regional housing data and analysis.

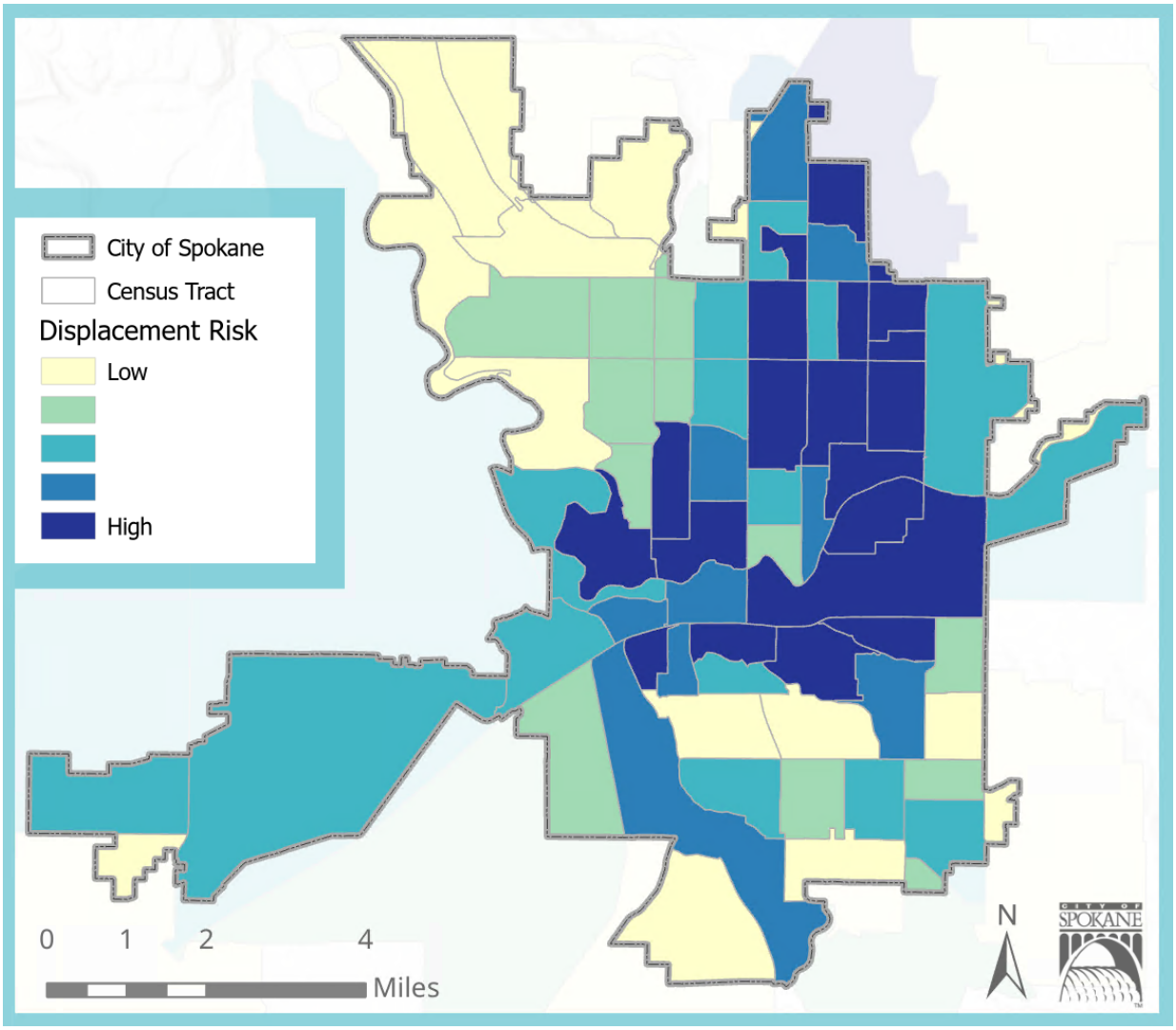
*Not yet implemented as of 2025.
**Action alternatives address racially disparate impacts requirements of HB 1220.
Source: (City of Spokane, 2021)

Displacement Risk

As part of the Periodic Update the City is examining displacement risk, which refers to when a household or business is "forced or pressured to move from their community by factors outside of their control." (Washington State Department of Commerce, 2023) Census tracts with greater potential for residential displacement are shown in **Exhibit 3.5-12.** The indicators of risk include:

- Rental affordability and availability
- Homeowner affordability
- Housing age
- Unpaid property taxes
- Access to services
- New development and future development pressure

Exhibit 3.5-12. City of Spokane Displacement Risk Map 2025



Source: (City of Spokane, 2025)

There are several causes of displacement:

- Economic displacement: Displacement due to inability to afford rising rents or costs of homeownership like property taxes.
- Physical displacement: Displacement resulting from eviction, acquisition, rehabilitation, or demolition of property, or the expiration of covenants on rent- or income-restricted housing. Climate-related displacement, such as increasing flood risk, dangerous heat, or forest fire, falls into this category. The potential risks due to changing climate could result in an inability to insure a property which could impede securing a mortgage.
- Cultural displacement: Residents are compelled to move because the people and institutions that make up their cultural community have left the area.

The Housing Action Plan (City of Spokane, 2021) found increasing housing costs and low availability (low vacancy) in the city could lead to economic displacement. Physical displacement due to development could occur with rehabilitation or demolition of housing units. Per **Exhibit 3.5-9**, comparing units built to units demolished there has been an 11% rate of demolitions over the 2010-2024 period (7,579 units completed divided by 808 demolished=11%), with 62% of demolitions being single-unit and 38% of demolitions related to multi-unit development.

Evaluation of Current Policies under State Laws

Racially Disparate Impacts (RDI) Policy Evaluation

Based on the data analysis provided in the City of Spokane Racially Disparate Impacts Report (City of Spokane, 2025), there is determination that the City has perpetuated racially disparate impacts, stemming from historic policies and practices that continue to impact residents' abilities to access housing and opportunities. The City has made recent progress through land use and code changes that begin to undo the impacts of racially disparate impacts. Policy analysis is important to change policy direction. The first lens for policy evaluation focuses on actions the policies support or prohibit, using the questions below for consideration. The second lens focuses on the narrative effect of the policy and whether it furthers harmful biases about groups of people and communities. Racial bias is a predisposition for or against based on unconscious associations about people based on race, whether intentional or unintentional.

Questions for Consideration:

- Is the policy effective in accommodating needed housing?
- Does the policy contribute to racially disparate impacts? Displacement? Exclusion in housing?
- Who benefits and who is burdened by the policy?
- Does the policy increase displacement risk? If so, can this be mitigated through policies or actions?
- Does the policy provide vulnerable communities protection from displacement?
- Does existing terminology encode bias, racially informed presumptions or phrases that promote exclusion?

In total, 29 policies were evaluated in the Housing Element, as of August 2025, with the following assessment: 10 of the policies were found to be supportive, 16 were found to be approaching, and 3 were found to either be challenging or not applicable. See **Exhibit 3.5-13**.

Exhibit 3.5-13. Summary of RDI Policy Evaluation

RDI Criteria	Evaluation	Policies Identified
The policy is valid and supports meeting the identified housing needs. The policy is needed and addresses identified racially disparate impacts, displacement, and exclusion in housing.	Supportive	10
The policy can support meeting the identified housing needs but may be insufficient or does not address racially disparate impacts, displacement, and exclusion in housing.	Approaching	16
The policy may challenge the jurisdiction's ability to meet the identified housing needs. The policy's benefits and burdens should be reviewed to optimize the ability to meet the policy's objectives while improving the equitable distribution of benefits and burdens imposed by the policy.	Challenging	2
The policy does not impact the jurisdiction's ability to meet the identified housing needs and has no influence or impact on racially disparate impacts, displacement, or exclusion.	Not Applicable	1

Source: (City of Spokane, 2025)

Once policies are revised in the Comprehensive Plan, additional analysis and implementation will be done through development regulations with clear and achievable incentives, strategies, actions, and regulations that help move toward goals. There are likely supportive and conflicting regulations within the Spokane Municipal Code as well. Review and updating of development regulations will come as part of the adoption of PlanSpokane 2046 in 2026.

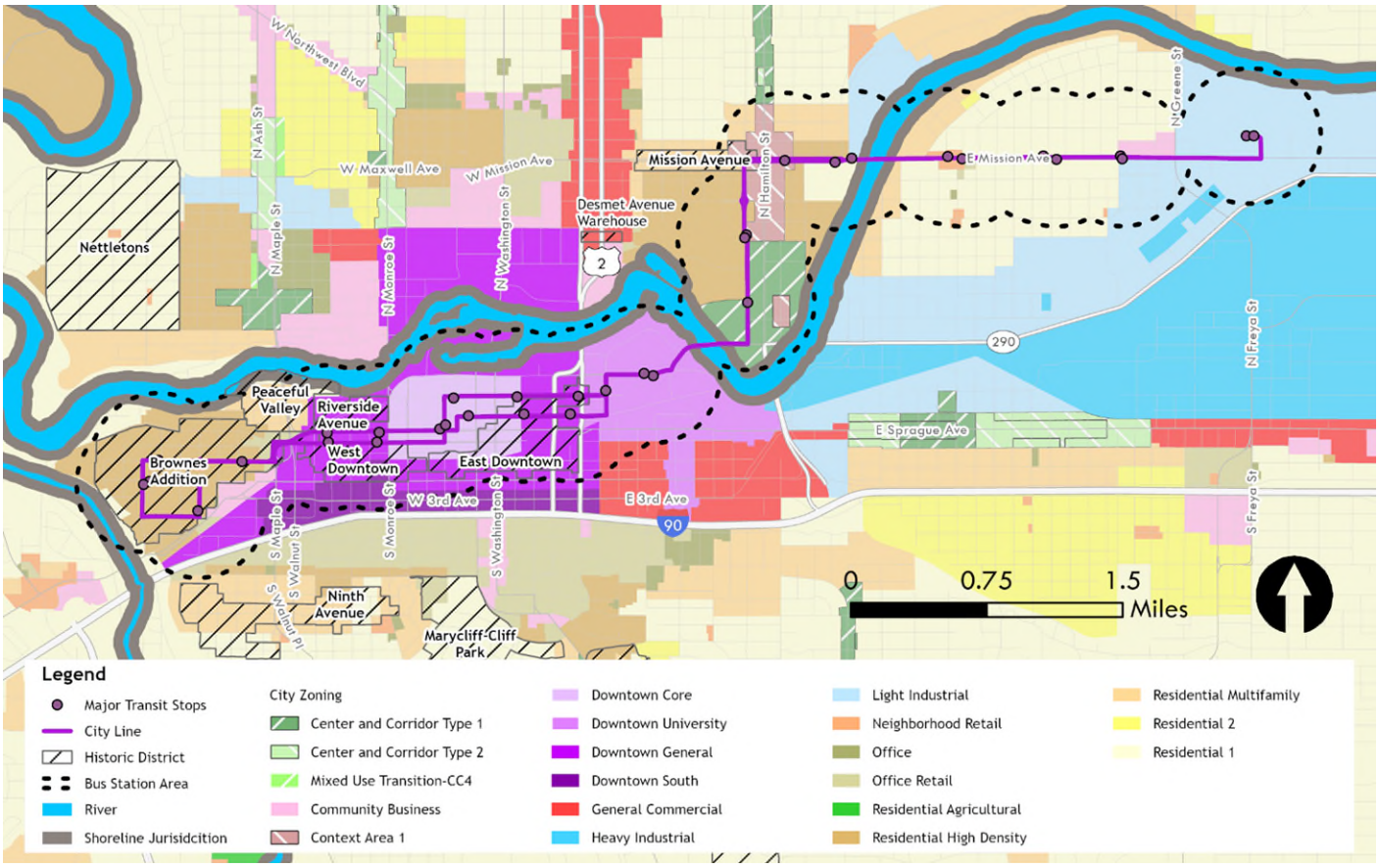
Bus Rapid Transit and Housing Densities and Displacement

Under HB 1491(2025), a city may not prohibit the siting of multifamily residential housing on lots where any other residential use is permissible within one-quarter mile of a bus station area (bus rapid transit) like along the existing City Line, or in the future, along the planned Division Bus Rapid Transit Line. HB 1491 requires a minimum floor area ratio[4] (FAR) of 2.5 applicable to residential and mixed-

[4] Building square footage divided by the developable property square footage.

use development in a bus station area.[5] A city may exempt areas with shorelines or critical areas or where there is a locally designated landmark or historic district established under a local preservation ordinance; the FAR minimum is 3.0 on average if a city exempts up to 25% of bus station areas. Additional FAR must be provided for housing made of mass timber. A minimum 10% of units must be affordable for at least 50 years and such buildings are allowed another 1.5 FAR. An extension to delay implementation is allowed for up to 5 years if the areas are at high risk for displacement, as certified by the Department of Commerce.[6] The City Line and buffer of a quarter mile with underlying zoning is provided in **Exhibit 3.5-14**.

Exhibit 3.5-14. Center Line BRT and Quarter Mile Buffer with Current Zoning 2025



Source: City of Spokane, 2025.

[5] Fully or partially within one-quarter mile walking distance of a stop on a fixed route bus system that is designated as a bus rapid transit stop.

[6] The City of Spokane shows moderate to high displacement risk in the census tracts along the route. Commerce's displacement risk map differs to some degree but also shows moderate and high risk.

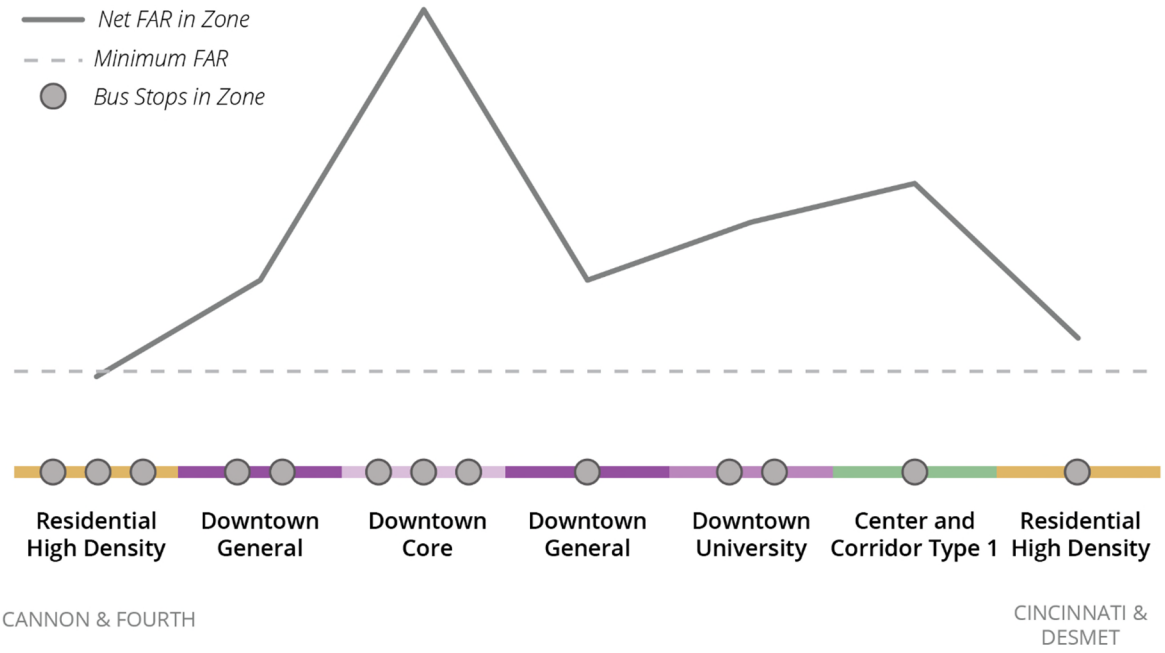
Areas that could be exempted include:

- Land within the Spokane River shoreline management area (200 feet of ordinary high-water mark).
- Land within Browne's Addition local historic district (it is also a national historic district). There are other national register districts (West Downtown, East Downtown, Peaceful Valley, Riverside Avenue). Section 17D.100.230 of the Spokane Municipal Code addresses demolition permits for historic structures located within the downtown boundary area, National Register historic districts, and centers and corridors.
- Industrial lands if the zoning limits housing to one dwelling per lot or for caretakers. Within one quarter mile of the river, the City's LI and HI zones allow group living (LI) and residential household living (LI and HI) subject to standards like access to the river, though it is unlikely in the Chief Gary Park area given presence of Avista and Spokane Community College campuses. Areas where housing is not allowed beyond caretaker housing can be excluded.

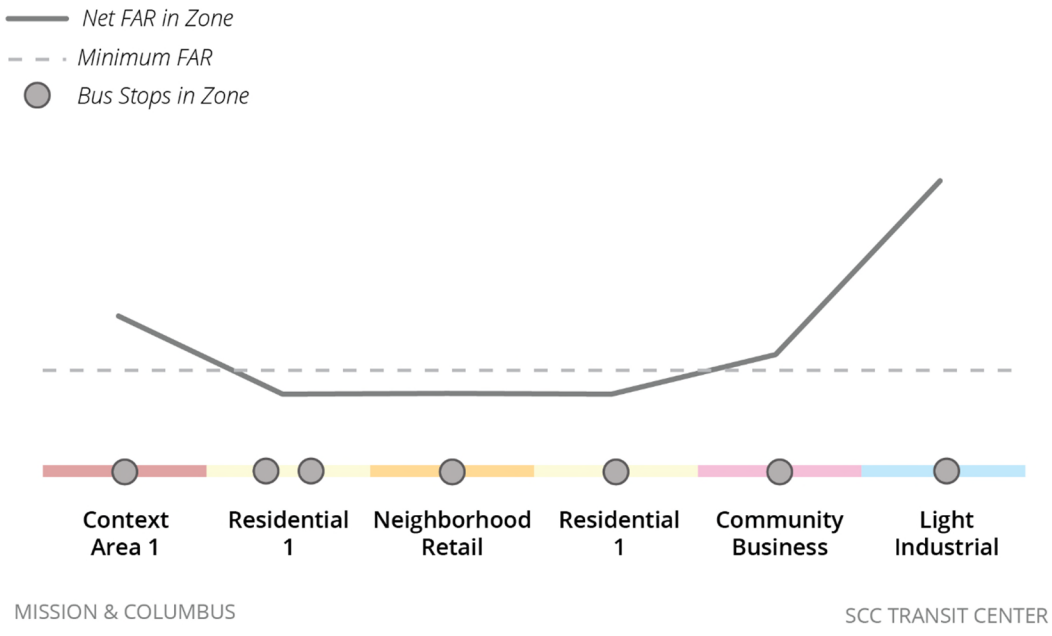
With no areas excluded, the current average FAR is 8.9. Excluding shorelines, local historic district, and industrial zones the current average FAR would be 6.3, with a conservative analysis of heights, still double the minimum 3.0 FAR. However, this is an average across all station areas, which includes areas of high intensity on the western portions of the City Line and lower intensity areas. Some station areas may not meet the minimum FAR. See **Exhibit 3.5-15** below for a conceptual depiction of results across the stations that shows the variable results. The Washington Department of Commerce is preparing implementation guidelines, and the evaluation is likely to change.

Exhibit 3.5-15. City Line HB 1491 Floor Area Ratio Conceptual Evaluation (2025)

Western End of City Line



Eastern End of City Line



Sources: City of Spokane, BERK, 2025.

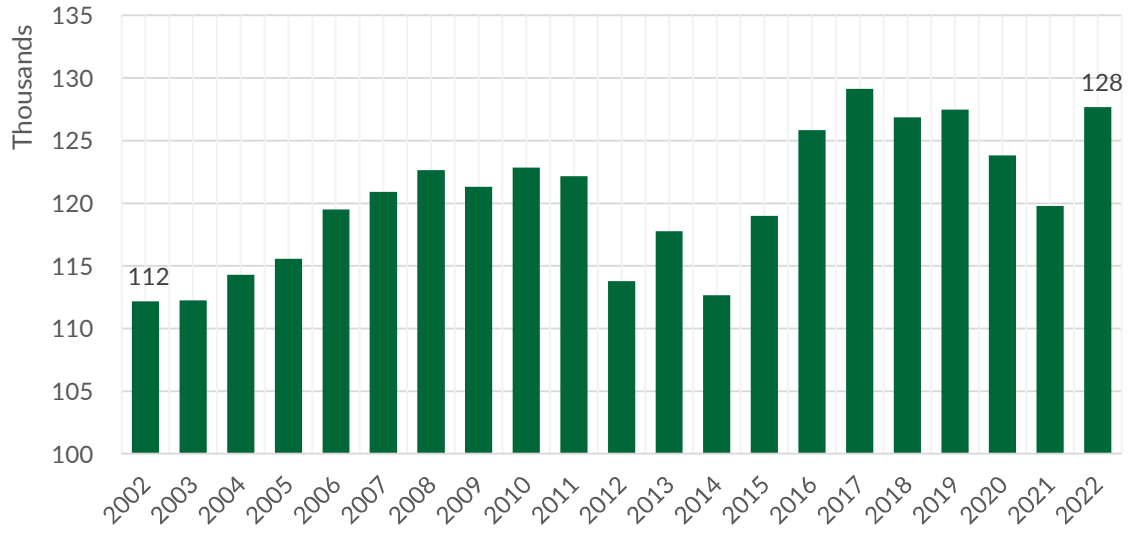
Employment

Total jobs and sectors

The city is a central job hub for the county and inland Northwest region and has approximately 128,000 jobs as of 2022. See **Exhibit 3.5-16**. In the past two decades, city employment experienced two periods of decline – in 2012 to 2014, a few years after the Great Recession and most recently from 2020 to 2021, during the COVID-19 pandemic. In 2022, employment had recovered to pre-pandemic levels.

From 2002 to 2022, city employment followed the same pattern of ebbs and flows as county employment but has consistently grown at a slower pace than the county, with 0.7% per year on average compared to 1.2% per year on average for the county.

Exhibit 3.5-16. Total Jobs 2002-2022 (in thousands)

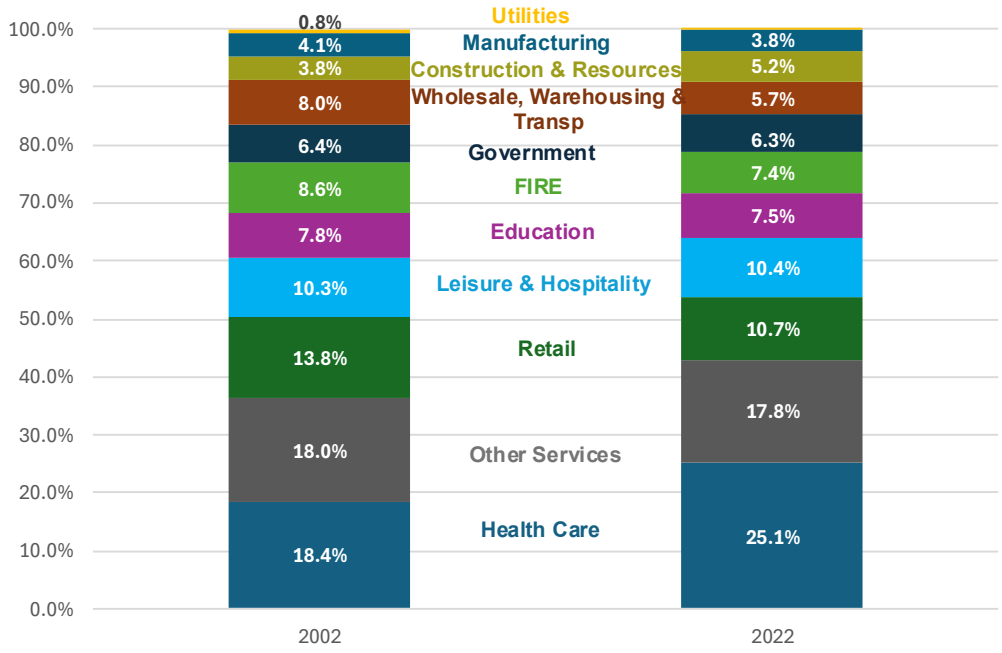


Sources: U.S. Census LEHD OntheMap, 2002-2022; BERK, 2025.

As shown in **Exhibit 3.5-17** and **Exhibit 3.5-18** the city's employment mix is service oriented with health care:

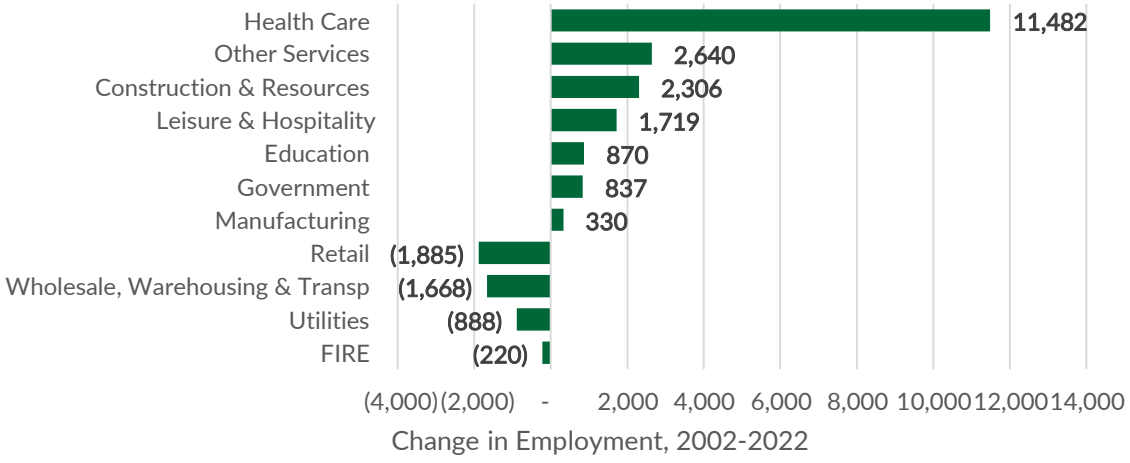
- *Health Care* and *Other Services* accounted for over 40% of the city's total employment in 2022. Health Care was by far the fastest growing industry in the City of Spokane. It added almost 11,500 jobs between 2002 and 2022, and its share increased from 18% to 25% of total citywide employment during this period.
- The *Retail* and *Wholesale, Warehousing & Transportation* industries experienced a decline of 12% and 19% respectively since 2002.
- The *Utilities* sector had a negative change in employment from 2002 to 2022, mostly because of the reclassification of the majority of Avista's office-type employment from Utilities to Other Services in the job data. Thus, it is not a true decline.

Exhibit 3.5-17. Employment by Industry, 2002 and 2022



Notes: FIRE stands for finance, insurance and real estate, rental, and leasing. Other Services includes information, professional, scientific, and technical services, management of companies and enterprises, administrative and waste management, and others.
Sources: U.S. Census LEHD OntheMap, 2002-2022; BERK, 2025.

Exhibit 3.5-18. City of Spokane Employment Change by Industry, 2002 - 2022



Notes: FIRE stands for finance, insurance and real estate, rental, and leasing. Other Services includes information, professional, scientific, and technical services, management of companies and enterprises, administrative and waste management, and others.
Source: U.S. Census LEHD OntheMap, 2002-2022; BERK, 2025.

The Workforce Council has provided job sector projections for the year 2034 that anticipates nearly 16,000 new jobs between 2024-2034. Over 35% of the new jobs are anticipated to be in healthcare and another 20% in other services (information, professional, other). (Spokane Workforce Council, 2025)

City and Regional Economic Development Goals

Economic Development Plans

The City's Economic Development goals are found in the current Comprehensive Plan and promote a strong and diverse economy with opportunities including available land, education, and workforce development, with the following themes of goals and policies:

- ED 1 Cooperative Partnerships
- ED 2 Land Availability for Economic Activities
- ED 3 Strong, Diverse, and Sustainable Economy
- ED 4 Income and Employment Opportunity
- ED 5 Education and Workforce Development
- ED 6 Infrastructure
- ED 7 Regulatory Environment and Tax Structure
- ED 8 Quality of Life and The Environment

The City of Spokane has planned for economic development in specific subareas that are key job centers including Downtown, Hillyard, and others. See **Section 3.6.1 Affected Environment**.

Public Development Authorities

There are three public development authorities (PDAs) in the city that are meant to promote economic development by attracting and coordinating investments, including the University District PDA in Center City, the Northeast PDA addressing the Hillyard area, and S3R3 addressing West Plains, particularly the airport. Each PDA's purpose is shared below:

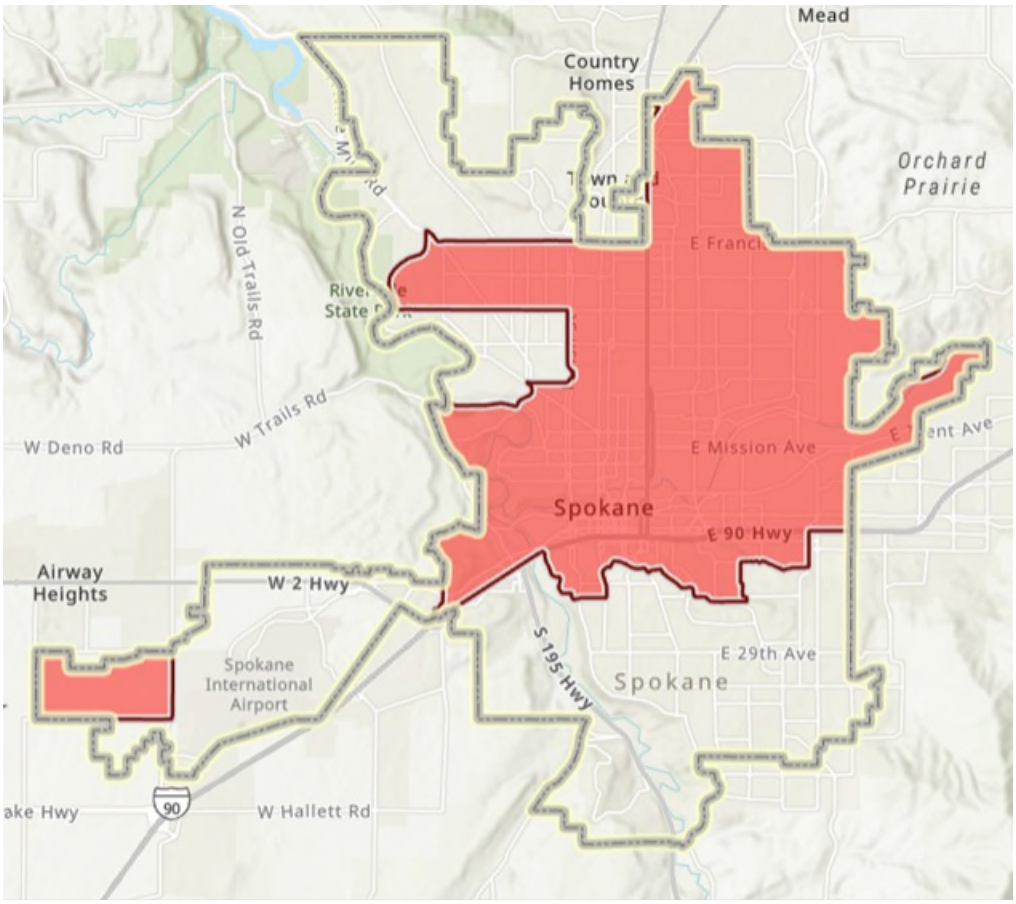
- **University District Public Development Authority:** Spokane's University District is where, "business and education grow together and the place to live, learn, work, and play in the Intermountain Northwest. …With five major universities, two medical school programs, top-notch community colleges, a nationally recognized smart city testbed, and a burgeoning life sciences ecosystem, this is an idea-generating and innovation-focused community…"
- **Northeast Public Development Authority (NEPDA):** The mission of the NEPDA is to "facilitate the redevelopment, development, and construction of public benefit projects, resulting in increased economic activity and job growth within the PDA boundary (The YARD)."
- **S3R3 Solutions (formerly known as West Plains/Airport Area Public Development Authority):** This PDA focus is "to undertake, assist with and otherwise facilitate the acquisition, construction, development equipping, leasing, operation and maintenance of public benefit projects within the

PDA boundaries…in order to assist both the City, County and the Spokane International Airport in their ability to improve the economic conditions in and around the City and County of Spokane."

Strategies & Programs

In 2022 the City of Spokane updated its economic development strategy to direct resources and incentives to the most economically distressed Census tracts, called the Spokane Target Investment Area. The Census tracts within the STIA were chosen by the criteria from the federal Community Development Financial Institutions (CDFI) Fund requirements for defining a distressed community for the New Market Tax Credit (NMTC) program. The STIA covers the geographies of all three PDAs, the City's two business improvement districts, Opportunity Zones, and Community Empowerment Zones, as well as Census tracts that are NMTC eligible. See **Exhibit 3.5-19**.

Exhibit 3.5-19. Target Investment Area



Source: (City of Spokane, 2025)

The City of Spokane has access to numerous incentive programs addressing housing and employment, including:

- **Multi-Family Tax Exemption:** A State enabled property tax exemption, the MFTE incentive allows a time-specific exemption on the property taxes for the residential improvements that create new

housing. In exchange for an exemption, at least 25-30% of the created units need to be workforce rental housing or affordable owner-occupied housing. The incentive allows for differing exemption lengths – 8 years (market rate rents), 12 years (workforce rentals and affordable ownership units), and 20 years (permanent owner-occupied units).

- **Single-Unit & Detached ADU Tax Exemption:** A State enabled property tax exemption for single unit housing administered through Spokane County, the incentive allows a property owner to have the new construction value of a physical improvement to their dwelling exempt for three years following the completion of the physical improvement, including the construction of an accessory dwelling unit. The amount of exemption is the difference between the dwelling's market value before and after the improvements, not to exceed 30% of the original market value.
- **Parking 2 People:** This incentive is for the redevelopment of underutilized parking via a State enabled sales and use tax deferral, which is meant to support construction of affordable housing. Upon approval from the Department of Revenue, who issues a tax deferral certificate, an applicant is able to defer the City of Spokane's approximately 9% sales and use tax on applicable purchases related to the housing being constructed. Fifty percent of the housing constructed through this incentive is then maintained as affordable for 10 years for residents with an area median income between 80-115% AMI.
- **Commercial Building Conversion:** This incentive is for the redevelopment of underutilized and existing commercial buildings via a State sales and use tax deferral. Upon approval from the Department of Revenue, who issues a tax deferral certificate, an applicant can defer the City of Spokane's approximately 9% sales and use tax on applicable purchases related to the housing being constructed. Ten percent of the housing constructed through this incentive is then maintained as affordable for 10 years for residents with an area median income at or below 80% AMI.
- **New Markets Tax Credit Benefits:** This US Treasury program, authorized by Congress in 2000, was created to increase the flow of private sector capital to projects that create jobs and provide goods and services in distressed communities. NMTCs attract private investment by providing banks with a 39% federal tax credit over seven years. The proceeds of these investments are used as flexible, forgivable financing for a wide variety of projects, such as manufacturing/industrial, health/medical centers, education facilities, and others. The benefit to a qualified NMTC project results in a net subsidy of 20%+ of the tax credits a project attracts.
- **Historic Tax Credits:** There are incentives available to owners of designated historic properties (commercial and residential) in the City of Spokane. This includes federal tax credits, property tax waivers, and façade grants. For designated historic properties in Spokane, the Special Valuation Tax incentive supports rehabilitation of historic properties by providing a 10-year property tax reduction. This incentive can be combined with MFTE or Federal Historic Tax Credits.
- **Opportunity Zones:** Opportunity Zones (OZs) are a community development program established by Congress to encourage long-term investments in low-income and urban communities. Under the 2017 Opportunity Zones program, the City of Spokane was able to have 11 census tracts designated by the federal government for qualified OZ investment. The City is working with the Governor's Office to renominate census tracts under the renewed Opportunity Zone legislation passed by the One Big Beautiful Bill. The existing and future census tracts are

aligned with the Spokane Target Investment Area, and the City's economic development strategy to support investment in areas that have suffered disinvestment.

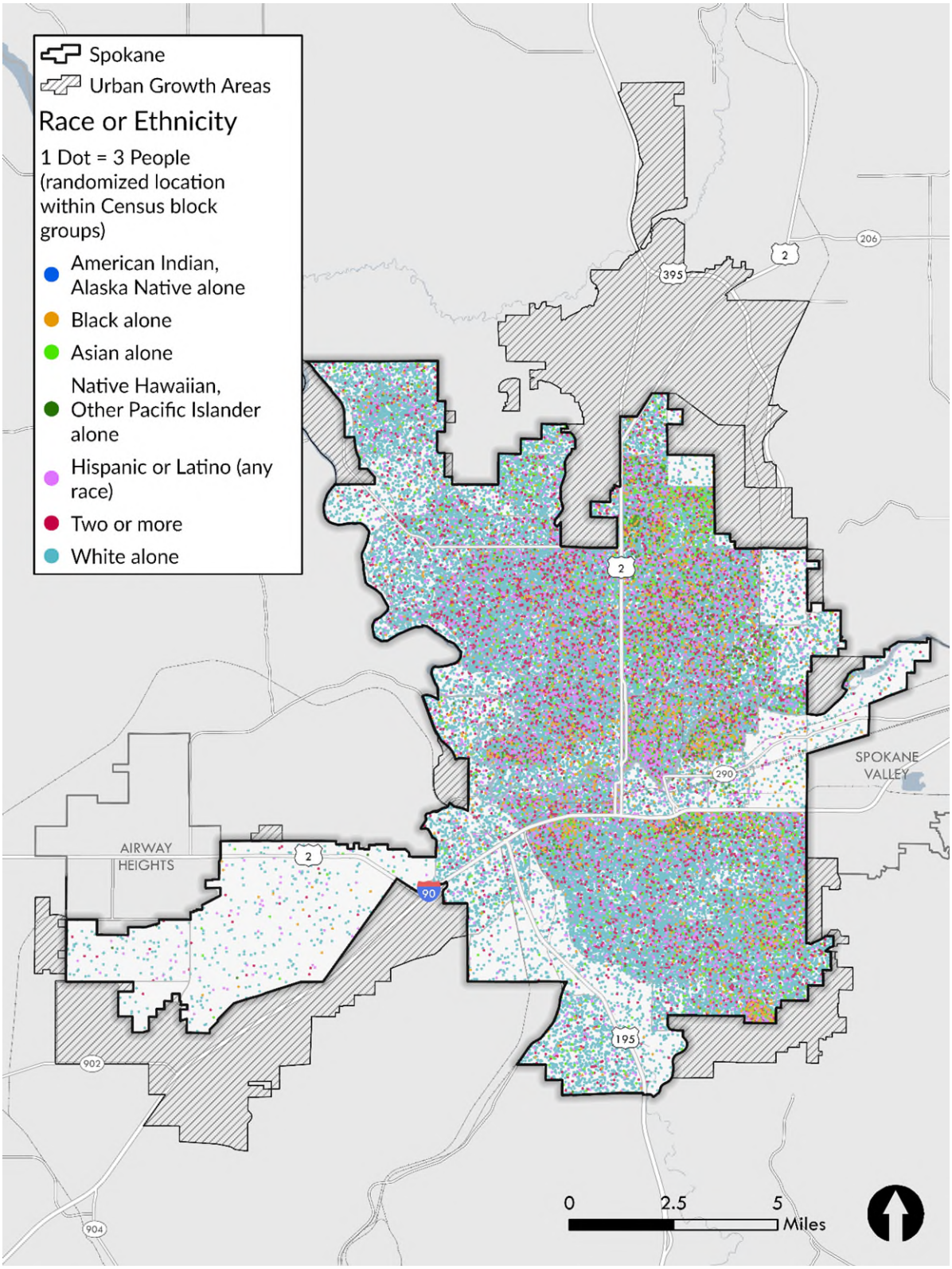
- **Brownfields Program:** Through partnership with the Environmental Protection Agency (EPA), the City of Spokane applies for EPA-funded Brownfields grants that fund work to evaluate if development, expansion, or redevelopment of property within the City might be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Property owners can get financial assistance completing environmental site analysis, as well as technical assistance from city staff and EPA staff. Examples of brownfield projects in Spokane include the Riverpoint Campus east of Downtown, Kendall Yards, and Riverfront Park.
- **Commercial Property Assessed Clean Energy + Resiliency (C-PACER):** Administered by Spokane County, this financing tool is an innovative financing mechanism to help commercial, industrial, and multi-family buildings become more efficient and resilient. Property owners have access to low interest loans, with longer payback terms, so that they can upgrade buildings to be more energy efficient.

Focus Areas

Population and Household Characteristics

Except in industrial areas or places with vacant land, there are dense populations in most parts of the city. The non-white population is more concentrated in the Northeast, Division, and Center City areas, whereas there is a greater density of the white population in the Northwest and South study area. Given the airport and employment uses, there is limited population in the West Plains. See **Exhibit 3.5-20**.

Exhibit 3.5-20. Population Density and Race (2020)

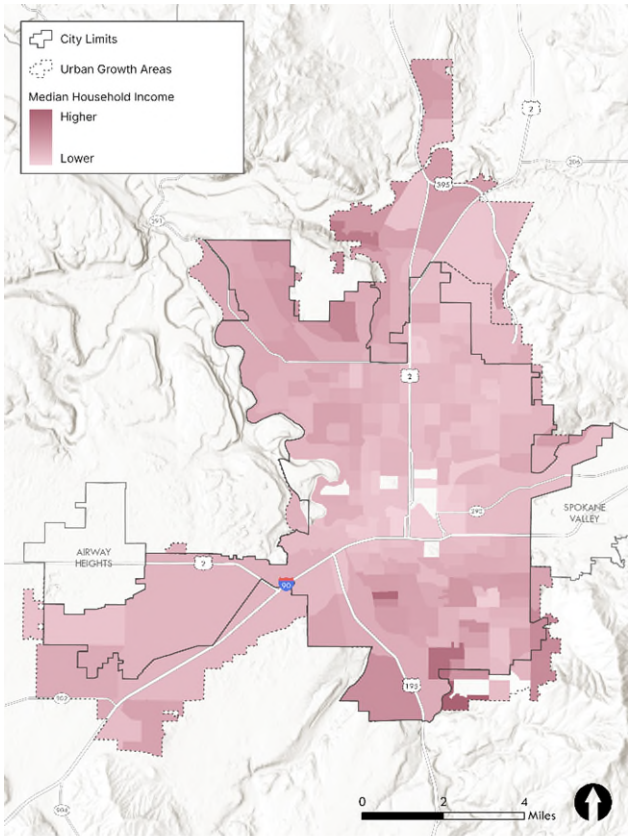


Note: Some census blocks extend into unincorporated areas.
Source: 2020 Decennial Census.

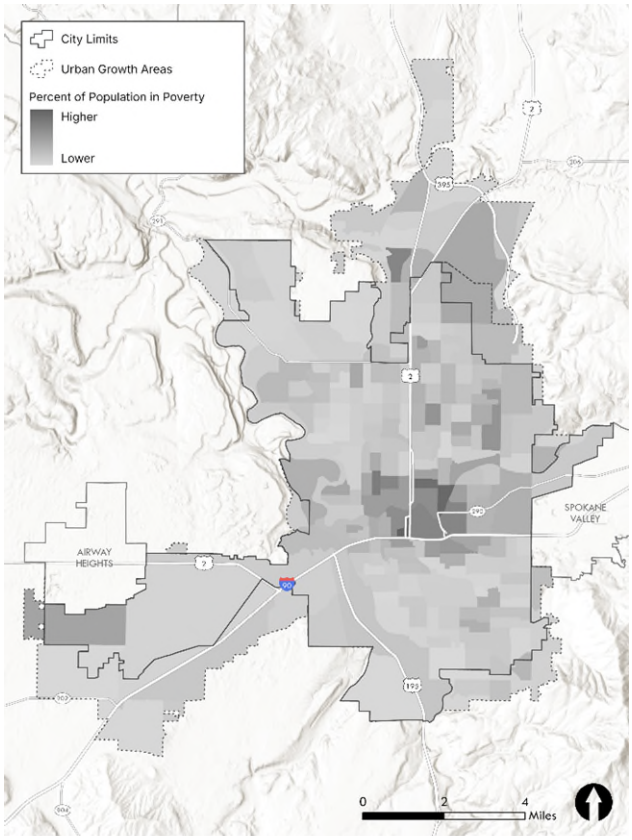
Households with higher median incomes tend to live in South Spokane. Households with greater levels of poverty tend to be concentrated in the Center City and Northeast study areas. See **Exhibit 3.5-21**.

Exhibit 3.5-21. Income and Poverty

Median Household Income 2022



Percent of People Living in Poverty 2022



Sources: ACS 2022 5-Year estimates for block group, Table B19013 and ACS 2022 5-Year estimates for block group, Table B17021.

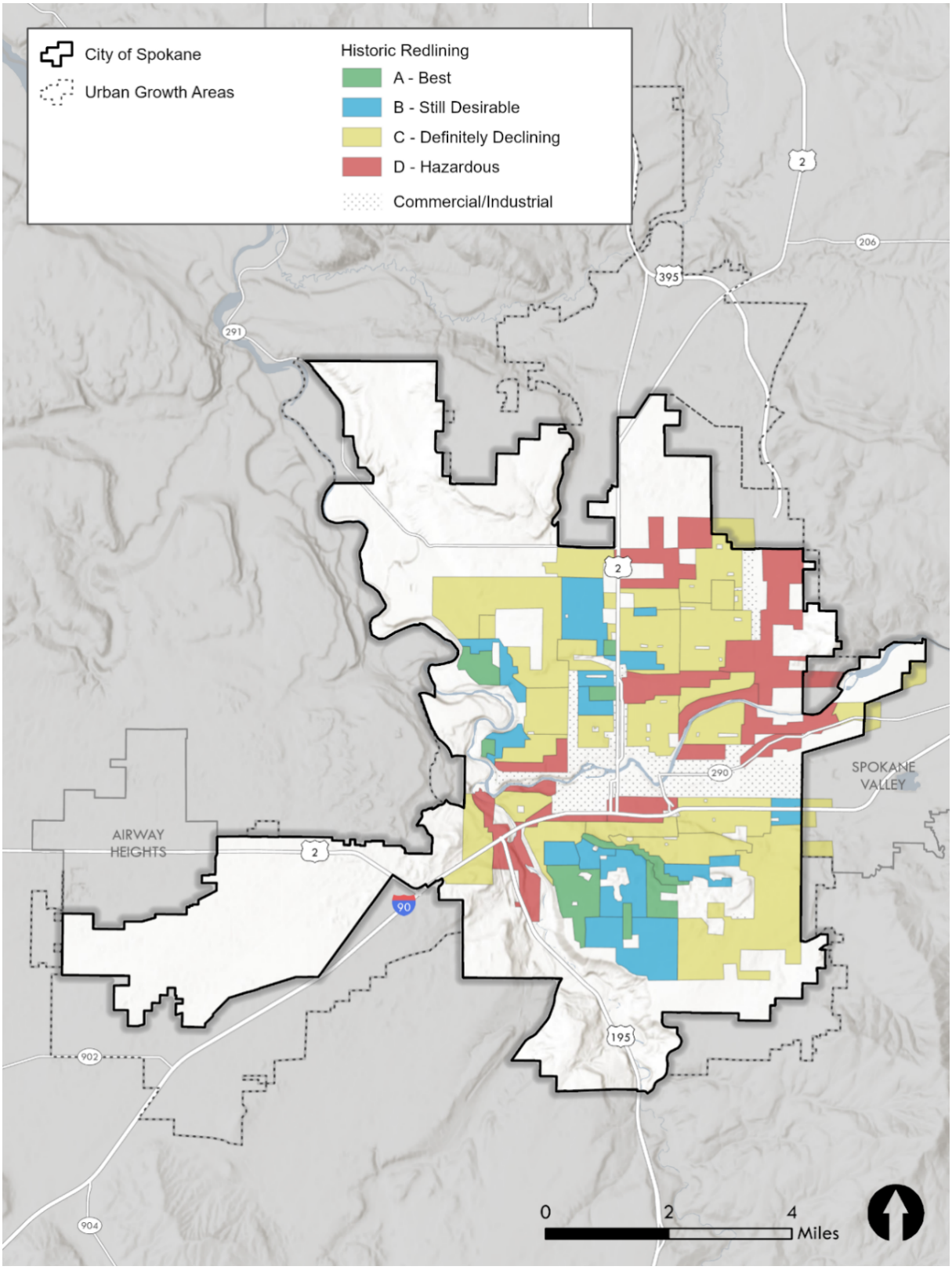
Neighborhood and Housing Condition and Affordability

Redlining is a "ranking system that categorizes neighborhoods as more or less impoverished largely based on the race of the residents. Government maps were created so that banks could determine where it was a "safe" bet to lend money to residents." (Nelson, R. K., Winling, L, et al., 2023) As shown in **Exhibit 3.5-22**, areas of Spokane were categorized into "grades" – the first grade in green signified the lowest risk for lending, and the fourth grade, indicated in red, signified a "hazardous" risk area for lending. The City's Racially Disparate Impacts Analysis, found that "exclusionary zoning enacted by the City of Spokane reinforced the impacts of redlining and racially restrictive covenants, wherein redlined areas historically had a lower percentage of single unit zoning in residential areas which had a segregating effect on BIPOC households and lower income households." (City of Spokane, 2025)

Areas that were redlined have reduced tree canopy and green spaces, lower-quality housing, and increased impervious surfaces, all of which exacerbate climate hazard risks. Redlined areas were also subjected to practices like highway construction, railroads, toxic waste siting, and other uses that have created health disparities. Redlined areas were located primarily in the Northeast and Center City as well as portions of West Plains and South study areas near US 195.

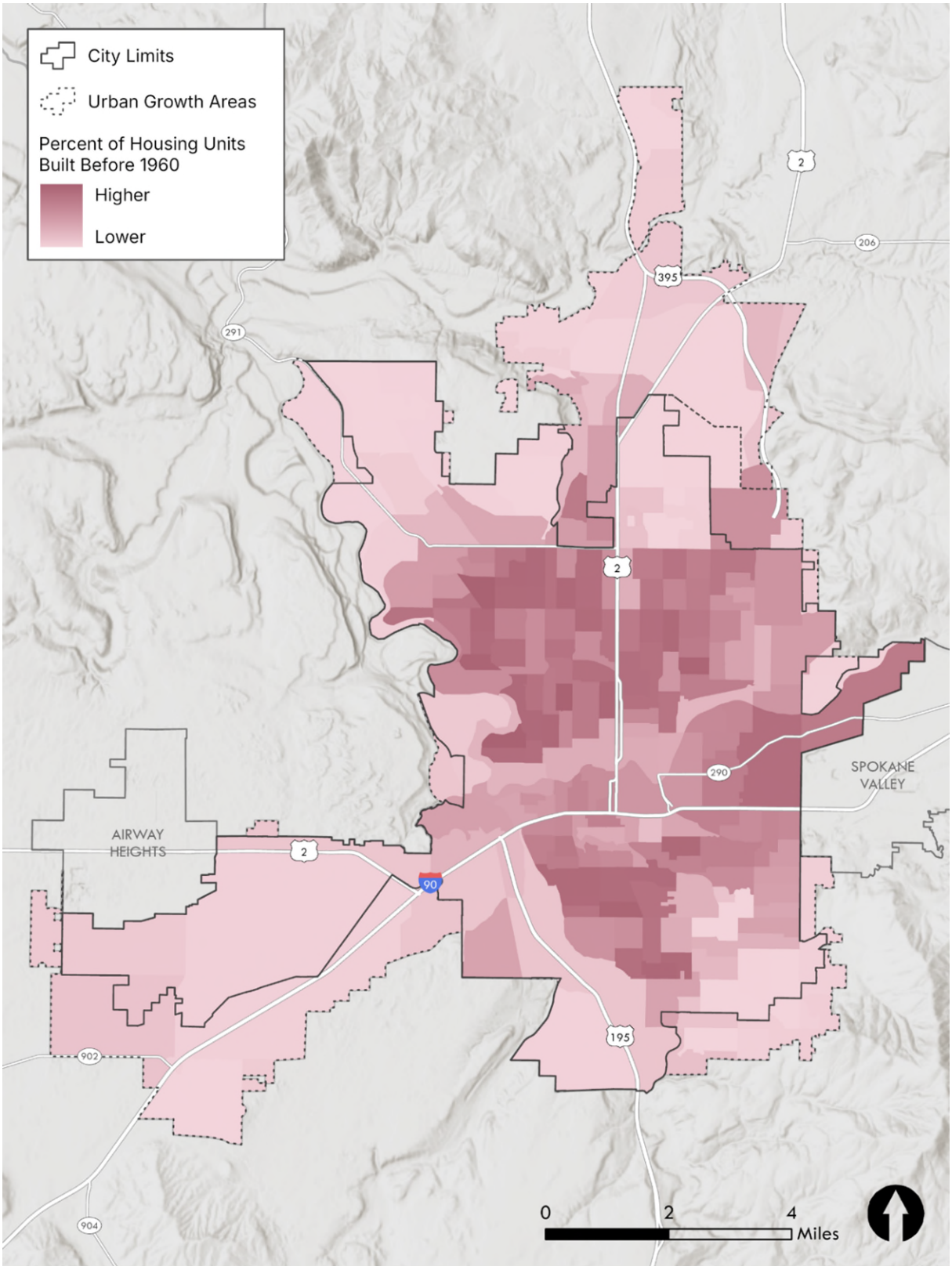
As a long-standing city, Spokane has housing stock built in all eras since the 1880s. Most housing throughout the city was built prior to 1960 and may lack more modern heating and cooling systems. See **Exhibit 3.5-23.**

Exhibit 3.5-22. Redlined Areas in City of Spokane 1938



Source: (Nelson, R. K., Winling, L, et al., 2023)

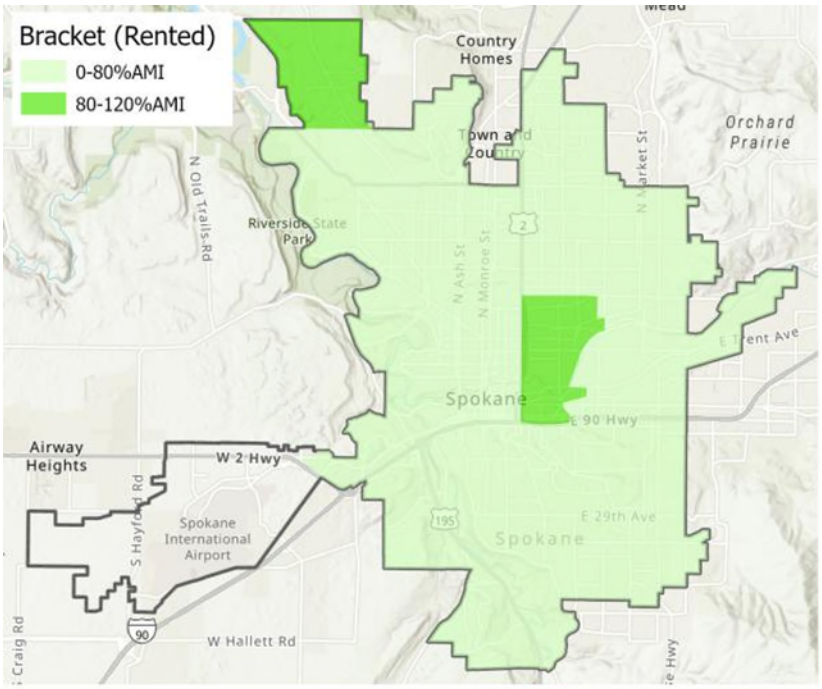
Exhibit 3.5-23. Percent of housing units built before 1960

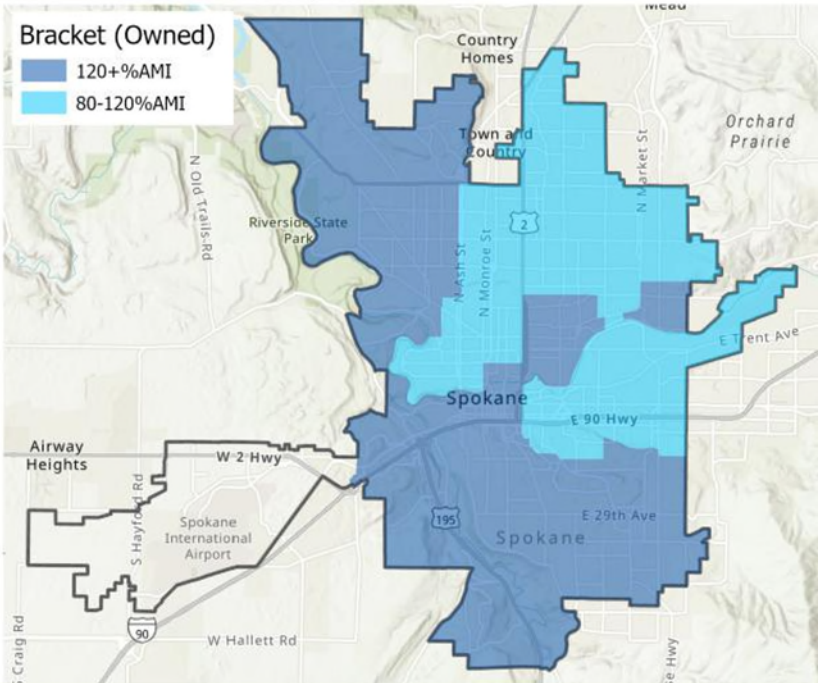


Source: ACS 2022 5-Year estimates for block group, Table B25034

Affordable rental housing is found throughout the city, though less so in the North Indian Trail neighborhood of the **Northwest** study area or Logan neighborhood of the **Northeast** study area. More affordable areas for ownership housing include most of the **Northeast** study area excluding Logan and Minnehaha neighborhoods, neighborhoods lining **Division** in the **Northwest** study area, and most of the **South** area, excluding the East Central neighborhood. See **Exhibit 3.5-24**.

Exhibit 3.5-24. Affordability of Rental and Owner Housing



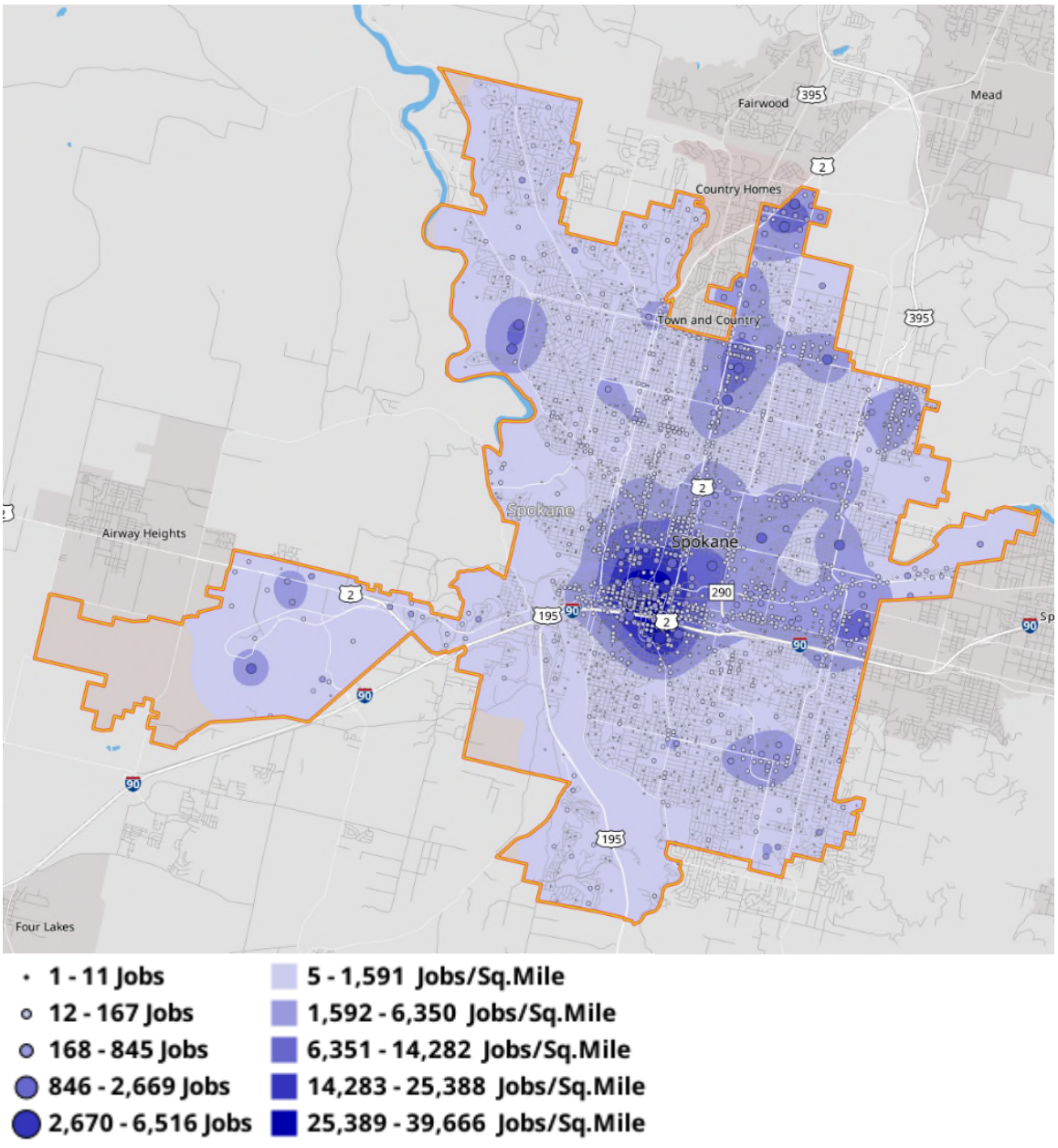


Source: (City of Spokane, June 2025)

Jobs in Study Areas

Most jobs in the city are located in Center **City** and along the **Division** corridor, as well as in the **Northwest** at the VA property and at the **West Plains** airport area. See **Exhibit 3.5-25**.

Exhibit 3.5-25. Total Jobs (2022)



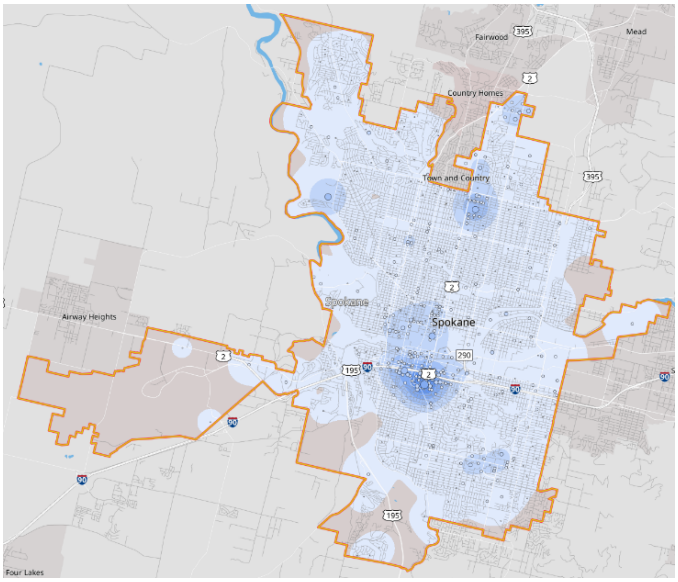
Source: Census on the Map, 2022.

When breaking down total jobs into particular sectors, clear patterns emerge about the economic ecosystem. Healthcare services are largely in the Center **City** and **Division** study areas. Retail jobs are along multiple corridors and nodes, particularly in the Center **City**, **Division**, and **Northwest** areas.

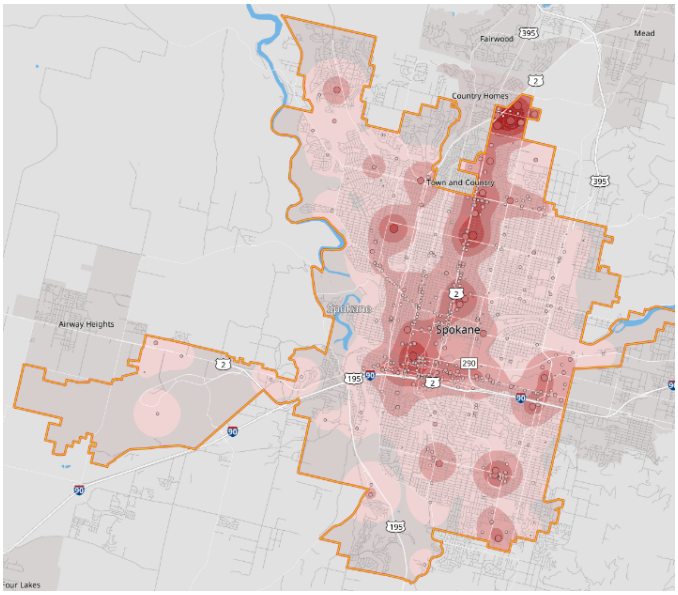
Some nodes are also found in the **South** study area. See **Exhibit 3.5-26**. Manufacturing jobs are in the Center **City** and **Northeast** study areas. Transportation and Warehousing jobs are similarly in Center City and Northeast, as well as **West Plains**.

Exhibit 3.5-26. Selected Job Sectors

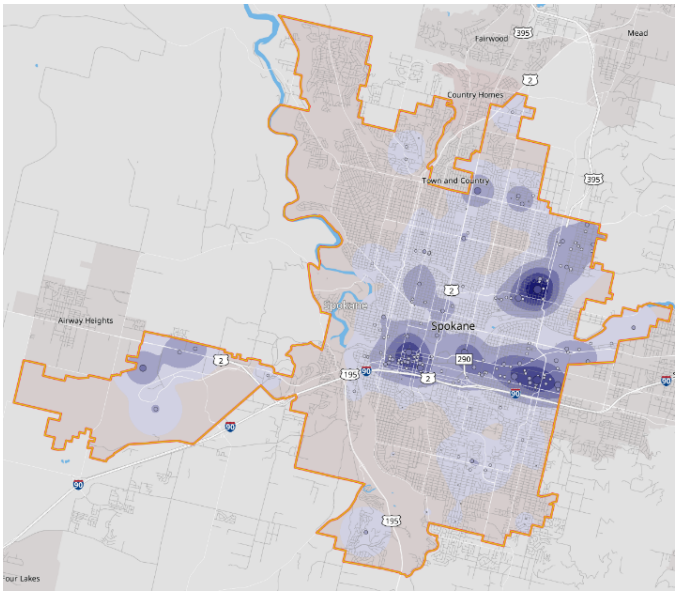
Health Jobs



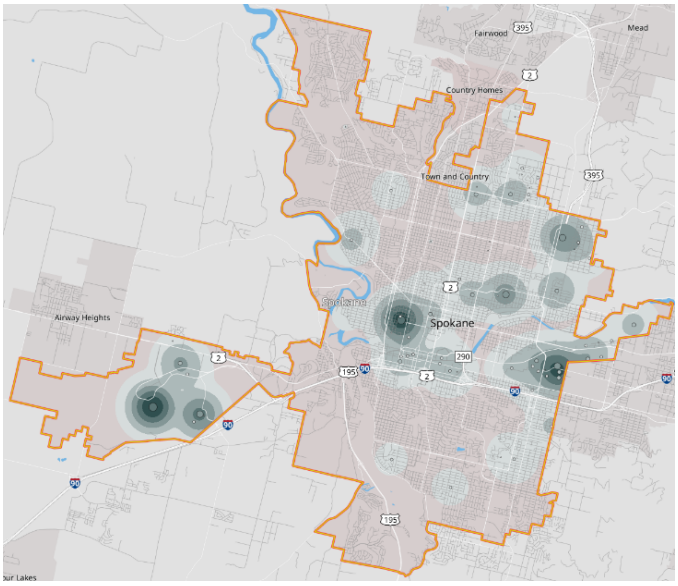
Retail Jobs



Manufacturing Jobs



Transportation/Warehouse Jobs



Source: Census on the Map, 2022.

3.5.2 Impacts

Impacts Common to All Alternatives

Citywide

Capacity for Housing and Population Targets

This sub-section addresses the following thresholds:

- Ability of the alternative to provide sufficient buildable land capacity for population and housing.

All alternatives provide capacity for more than the total housing target of 21,738 between 2022 and 2046 based on the City of Spokane's 2025 Land Capacity Analysis of Alternative 1 Stay the Course. Alternative 1 provides total capacity for 30,165 dwelling units. See **Exhibit 3.5-27**. As described in **Chapter 2**, Alternatives 2 and 3 propose to increase opportunities for low- and mid-rise housing, increasing land capacity, as well as continue Alternative 1's approach to middle housing. Once a preferred alternative is developed, new zoning would be identified and the increased land capacity determined.

Exhibit 3.5-27. Alternative 1 Land Capacity and Total Housing Target

AFFORDABILITY ANALYSIS	TOTAL
Need (HAPT*) 2020-2046	22,359
2021-2022 Completes**	621
Remaining Total Target: 2022-2046	21,738
Alternative 1: LCA capacity ***	30,165

Notes: *HAPT – Housing for All Planning Tool
** Completes are based on the data available in the City of Spokane's June 2025 Report, Accommodating Affordable Housing. (City of Spokane, June 2025) As data is improved and evaluated, there may have been more housing completions than reported which show progress in meeting the City's housing target.
*** LCA – Land Capacity Analysis
Sources: City of Spokane, 2025, BERK 2025.

Since the population target is similar to the housing target, and all alternatives have housing capacity exceeding the housing target, each alternative would more than meet population targets. See **Exhibit 3.5-28**.

- Population Target 2022-2046: 25,157 or 1.2 persons per household per target housing unit
- Population with Current Household Size: 50,650 or 2.33 persons per household per target housing unit

Adding the new population to the existing population (2022) moderates the household size. See **Exhibit 3.5-28**.

Exhibit 3.5-28. Population and Household Size

	BASED ON TARGETS	BASED ON TRENDS
Existing Population 2022	230,900	230,900
Net Change 2022-2046	25,157	50,650
Resulting Population	256,057	281,550
Existing Occupied Housing	95,604	95,604
Housing Target	21,738	21,738
Future Housing Units	117,342	117,342
Future PPHH	**2.182**	**2.399**

Source: OFM 2022, BERK 2025,

Housing Variety and Affordability

This section evaluates the following thresholds:

- Ability of the alternative to increase the supply, diversity, and affordability of market-rate housing.
- Ability of the alternative to increase the supply of income-restricted housing.
- Regulatory barriers to, and insufficient capacity for, the production of affordable units needed in line with City's role / requirements under HB 1220).

Housing Variety and Affordability

Housing types accommodated by all alternatives include single unit, middle housing, and higher intensity multi units. Alternative 1 would not provide sufficient capacity in zones with potential to support new units at 0-80% AMI affordability level, with a negative balance of -5,477. See **Exhibit 3.5-29**.

Exhibit 3.5-29. Housing Capacity and Affordability – Alternative 1

Affordability Analysis	0-80% AMI	80-120% AMI	120+% AMI	Total
Need (HAPT*) 2020-2046	15,347	2,588	4,424	22,359
2021-2022 Completes**	216	116	290	621
Remaining Total Target: 2022-2046	15,131	2,472	4,134	21,738
LCA capacity***	9,654	8,036	12,475	30,165
Remaining target during EIS evaluation period 2022-2046	-5,477	5,564	8,341	8,428
Housing Types that typically serve needs	Low Rise and Mid Rise (walk-ups up to 3 stories, apartments, and condos)	Moderate Intensity (townhomes, duplex, triplex, 4-plex) + ADUs	Low Intensity (single-unit)	

Notes: *HAPT – Housing for All Planning Tool
** Completes are based on the data available in the City of Spokane's June 2025 Report, Accommodating Affordable Housing. (City of Spokane, June 2025) As data is improved and evaluated, there may have been more housing completions than reported which show progress in meeting the City's housing target.
*** LCA – Land Capacity Analysis
Sources: SRTC, 2024, City of Spokane, 2025, BERK 2025.

Alternatives 2 and 3 would allow for increased moderate to high intensity residential and mixed-use designations in corridors or centers that increase opportunities for low- and mid-rise housing, typically serving households with incomes at 0-80% AMI. Alternatives 2 and 3 would increase the multi-unit housing shares from 35% under Alternative 1 to 41% per **Chapter 2, Exhibit 2.2-6**. Alternative 3 would focus more density in the Center City and Division Corridor study areas as well as selected other corridors, while Alternative 2 would add density to more corridors throughout the city. See **Exhibit 3.5-30**.

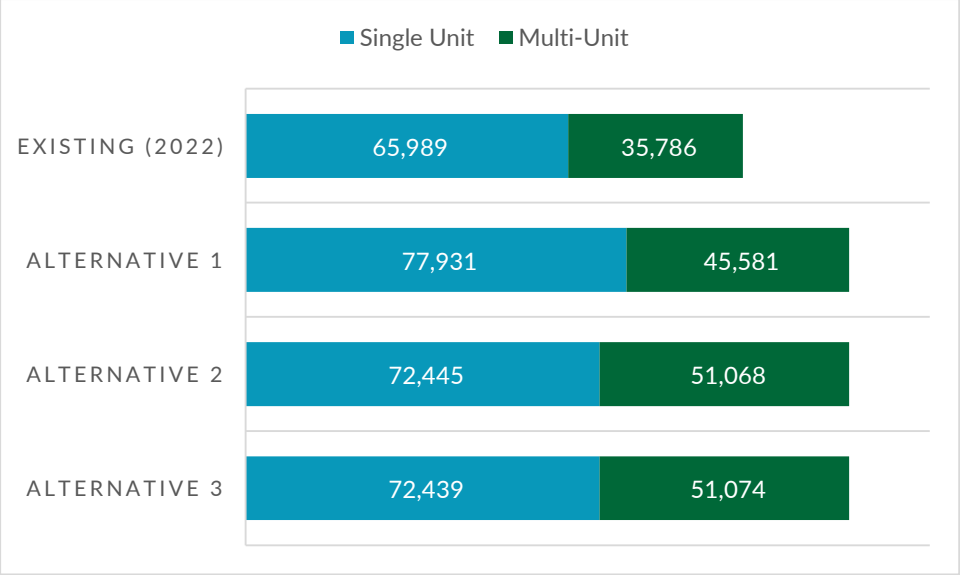
Exhibit 3.5-30. Housing Types by Alternative

Density Group	Alternative 1: Housing Types Allowed	Maximum Density Allowed	Assumed Density	Action Alternatives 2 And 3
Low Intensity Residential	Single-Unit and Middle Housing	10 (approximate)	5-9 du/ac	Alternatives 2 and 3 implement Middle Housing similar to Alternative 1
	Middle Housing	20 (approximate)		
Moderate Intensity Residential	Middle Housing and Multi-Unit	30 (approximate)	29 du/ac	Under Alternatives 2 and 3 along frequent transit corridors: Increased moderate and high intensity residential areas, supportive of Low- and Mid-Rise Housing
High Intensity Residential		No Limit		
Non-Residential, Excluding Industrial	Middle Housing and Multi-Unit	No Limit	30.2 du/ac in 33% of the development	Under Alternatives 2 and 3 along frequent transit corridors and Alternative 3 in the Center City: Increased Mixed-use areas, Supportive of Low and Mid Rise
Downtown	Middle Housing and Multi-Unit	No Limit	44.4 du/ac in 33% of the development	Under Alternative 3 in the Center City and selected corridors: Increased share of residential at higher densities

Sources: (City of Spokane, June 2025); BERK 2025.

Reflecting the housing targets and added low- and mid-rise housing, Alternatives 2 and 3 alter the share of growth that is multi-unit housing; however, in 2046 the majority of housing citywide would still be single-unit. See **Exhibit 3.5-31**.

Exhibit 3.5-31. Housing Mix 2022 and 2046 by Alternative



Source: SRTC, 2022; BERK 2025.

Floor Area Ratios Along Bus Rapid Transit Lines

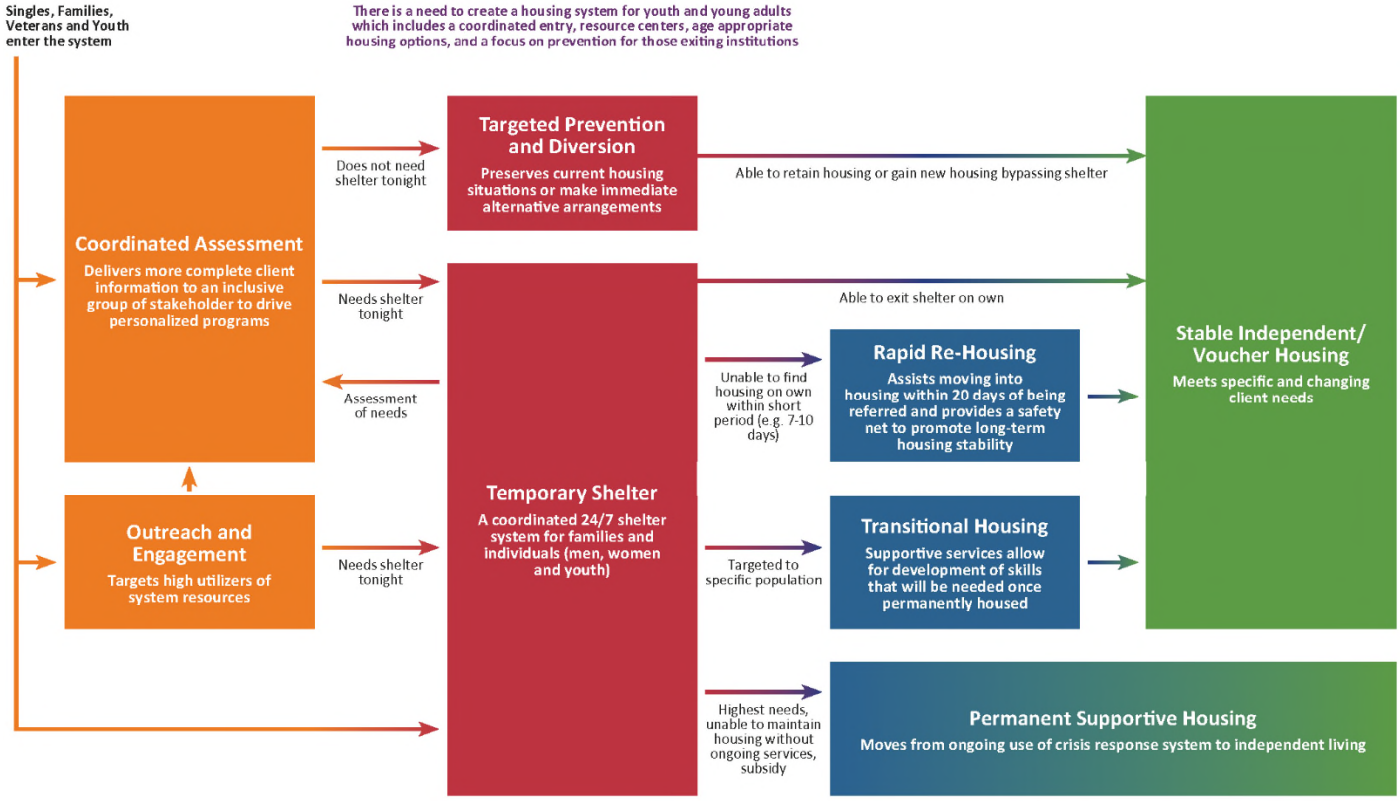
Under current zoning (Alternative 1) the City of Spokane already provides sufficient FARs along the City Line except along the eastern portion of the line where lower intensity is planned. See **Exhibit 3.5-15**.

Alternatives 2 and 3 provide for added Mixed Uses/Commercial and High Density Residential along the City Line, and Alternative 3 provides more extensive Mixed Uses/Commercial areas beyond the City Line corridor. Thus, the City would meet the FAR requirements with these alternatives. Additional code amendments would be needed under any studied alternative to address inclusionary affordable housing, multifamily tax exemption amendments, and mass timber incentives. The City may also request a portion of the area be exempt for five years in areas of high risk of displacement (e.g., East Mission Avenue east of river) subject to the Department of Commerce approval.

Permanent Supportive and Emergency Housing

The City's housing targets include a share of housing that is permanent supportive housing ("PSH") that would mean the addition of 1,851 PSH housing units between 2020 and 2046. The allocation of emergency housing is 983 beds. Under all alternatives, the City would continue programs and regulations to address homelessness. It addresses temporary shelter, re-housing, transitional housing, and permanent supportive housing. See **Exhibit 3.5-32**.

Exhibit 3.5-32. City of Spokane – Compassion Spokane Approach to Homelessness



Source: (City of Spokane, Undated)

HB 1220 (2021) requires jurisdictions to update their development regulations with respect to emergency shelters, transitional housing, emergency housing, and permanent supportive housing (STEP). The current Spokane Municipal Code requirements for some STEP uses are sufficient to meet the requirements of HB 1220; thus, all alternatives would likely comply with this requirement. However, development of new housing in the most affordable bracket (either PSH or non-PSH) would not meet the requirements of HB 1220 due to the availability of land in more affordable locations. Conversely, the action alternatives provide capacity for housing at all income levels, update the Housing Element policies on emergency and permanent housing, and implement code amendments to address STEP housing.

Implementation of Housing Action Plan

The City has implemented many recommendations of the Housing Action Plan (HAP) under Alternative 1 Stay the Course, such as allowing for middle housing, creating a Target Investment Area (see **Exhibit 3.5-19**) and incentives, addressing short-term rentals, numerous updates to Accessory Dwelling Unit standards, and more. Action alternatives would advance more HAP strategies to streamline permitting under the SEPA infill exemption and SEPA exemption thresholds, improve infrastructure in centers and corridors, target higher intensity development to where there is ready access to transit, and

address other strategies to reduce racially disparate impacts consistent with new Housing Element requirements. See **Exhibit 3.5-33**.

Exhibit 3.5-33. Housing Action Plan Strategies Advanced under Alternatives

✓ Strategy Implemented ◆ Strategy Under consideration with EIS Alternatives

	Alt. 1	Alt. 2	Alt. 3
A. Increase housing supply, options, and affordability for all incomes.			
A1. Explore and expand allowed housing types to encourage missing middle housing throughout Spokane's neighborhoods.	✓	✓	✓
A2. Target efforts to increase the development of affordable housing throughout the city to support mixed-income neighborhoods.	✓	✓	✓
A3. Continue to streamline and simplify changes to the City's permit process, as necessary.		◆	◆
A4. Leverage infrastructure and investment, including near high-performance transit stops, in Centers and Corridors, the downtown core, and other targeted areas to increase housing supply.		◆	◆
A5. Revise Accessory Dwelling Unit standards to allow for additional flexibility.	✓	✓	✓
A6. Leverage public and partner-owned[7] land for housing, including a land bank. (not yet implemented)			
B. Preserve existing housing affordability and quality to help people thrive where they live.			
B1. Expand preventative and proactive code enforcement to help maintain safe and quality housing. (not yet implemented)			
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.	✓	✓	✓
B3. Enhance protections and assistance for renters, particularly the most vulnerable.		◆	◆

[7] The HAP described examples of partners as Spokane Public Schools and the Washington Department of Transportation.

	Alt. 1	Alt. 2	Alt. 3
B4. Maintain and improve existing affordable rental housing.	✓	✓	✓
B5. Study the local short-term rental market to reduce impact on housing affordability, neighborhood identity, and displacement.	✓	✓	✓
C. Enhance equitable access to housing and homeownership.			
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.		◆	◆
C2. Address racial inequities and disparities in housing.		◆	◆
C3. Preserve and stabilize the viability of existing homeownership for low-income homeowners.		◆	◆
D. Leverage and grow partnerships to support housing initiatives across the region.			
D1. Support growth management planning which best meet the Comprehensive Plan's goals and policies.	✓	✓	✓
D2. Leverage partnerships within the health, education, parks, and transportation fields to support housing affordability, access to opportunity and quality of life.		◆	◆
D3. Grow and expand use of both local and regional housing data and analysis.		◆	◆

✓ Strategy Implemented
◆ Strategy Under consideration with EIS Alternatives and updated Housing Element per HB 1220 and other laws.

Equity and Disparate Impacts

This section addresses the distribution of housing, employment opportunities, and neighborhood amenities, and the potential that alternatives could adversely or positively affect overburdened communities and vulnerable populations. The thresholds include:

- Amount of new housing in areas with high displacement risk.
- Projected loss of homes due to demolition in high displacement risk areas.
- Amount of new housing in connected and accessible neighborhoods (transit, libraries, parks).
- Potential for job or business displacement for employment uses located within medium/high intensity residential or mixed-use designated areas.

Residential Displacement

A 2025 Pew study found that new housing production slows rent growth throughout a metropolitan region, but it takes the most pressure off of older, less-expensive housing (Seva Rodnyansky, 2025). While all alternatives assume the same amount of total new housing production, Alternatives 2 and 3 would provide a greater diversity of new housing compared to Alternative 1. These alternatives are expected to increase the supply of apartments and other rental housing options, with potential to have the greatest impact on moderating housing cost escalation among the city's existing rental housing stock. As a result, Alternatives 2 and 3 are expected to reduce economic displacement pressure for current and future low-income renter households, including vulnerable households in areas of highest displacement risk, when compared to Alternative 1.

While rising housing costs are currently the most significant contributor to displacement pressure in Spokane, there is also potential for physical displacement when older housing units are demolished to make way for new development. Between 2010 and 2024, an average of 76 housing units were lost to demolition each year in Spokane, and the loss of older homes is expected to continue under all alternatives.[8] In some cases, the demolished homes are relatively affordable compared to new market rate housing. And in some cases, the demolition of older homes can result in the physical displacement of lower-income renter households who resided in those older units.

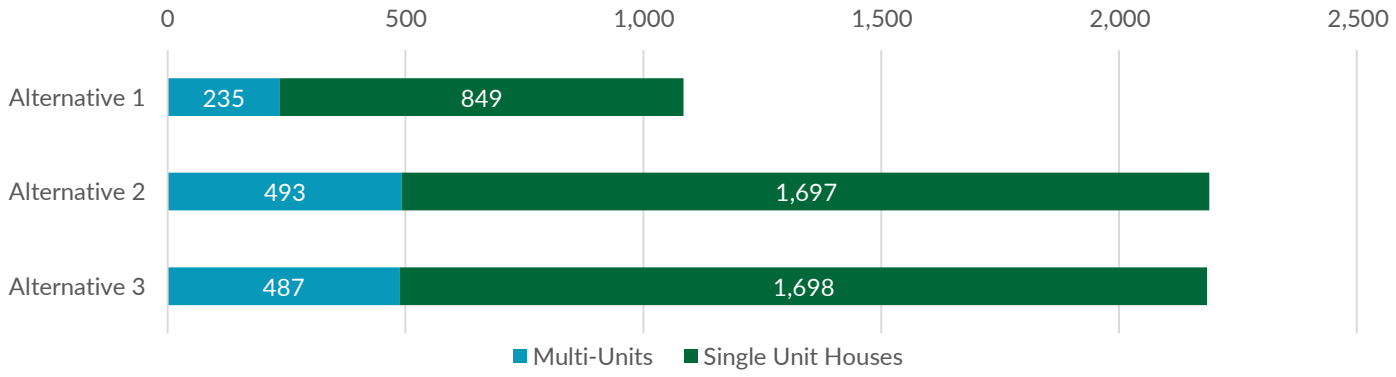
While it is impossible to predict whether a demolition will result in the displacement of a household, it is possible to estimate the types of homes that will be demolished and their approximate affordability level.[9] **Exhibit 3.5-34** compares the alternatives with regards to projected demolitions by housing type. Alternative 1 focuses more of its total housing growth in areas of the city with vacant land where fewer

[8] Source: Washington State Office of Financial Management, 2025; BERK, 2025.

[9] To estimate the number of existing housing units that could be demolished as a result of redevelopment, BERK utilized land capacity analysis data. Specifically, for each transportation analysis zone (TAZ) we calculated the total number of existing housing units on redevelopable parcels and divided this by the total capacity for new housing development. BERK then multiplied this "demolition ratio" by the projected housing growth in the TAZ to estimate the number of existing housing units that may be demolished during the planning period. This method is likely to produce a conservatively high estimate of demolitions given that new development is more likely to occur on vacant parcels or those with no existing homes (such as an empty parking lot or strip mall). Additionally, zoning changes associated with each action alternative would increase capacity in many TAZs, which would reduce the demolition ratio.
To estimate demolished units by housing type, BERK first calculated for each TAZ the percentage of existing units on redevelopable parcels that are single unit and the percentage that are in multi-unit buildings. We then applied these percentages to the total estimated demolished units in each TAZ to calculate demolished units by housing type.
To estimate the affordability level of each demolished unit, BERK leveraged prior City work that identified the typical affordability level of existing ownership and rental units by area of the city in Accommodating Affordability Housing in the City of Spokane, Washington, June 2025. For each TAZ, we applied the ownership affordability level to demolished single-unit homes and the rental affordability level to demolished multi-unit homes.

existing housing units are expected to be demolished to make way for new development. Alternatives 2 and 3, on the other hand, focus more growth in established areas of the city where more new construction will occur through redevelopment. As a result, Alternatives 2 and 3 are expected to demolish over twice as many housing units when compared to Alternative 1. In all alternatives, most of those units demolished are detached single unit houses where the previous residents could be homeowners or renters. A smaller number of demolished units are expected to be multifamily housing, which is much more likely to be occupied by renters.

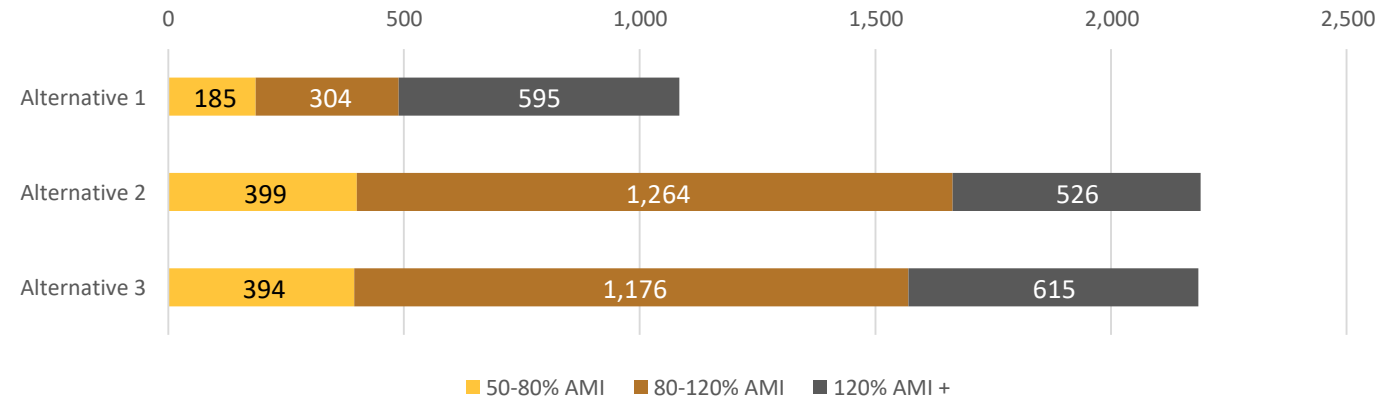
Exhibit 3.5-34. Projected Housing Units Demolished by Housing Type



Sources: City of Spokane, 2025; BERK 2025.

Exhibit 3.5-35 shows projected demolished units by affordability level. It is expected that most of these units would be affordable at the moderate (80-120% AMI) or high (120%+ AMI) income level. This is because demolished units are predominantly older single unit homes. Compared to Alternative 2, Alternative 3 is anticipated to have slightly fewer units demolished at 50-80% AMI and 80-120% AMI levels and slightly more at the 120%+ AMI level.

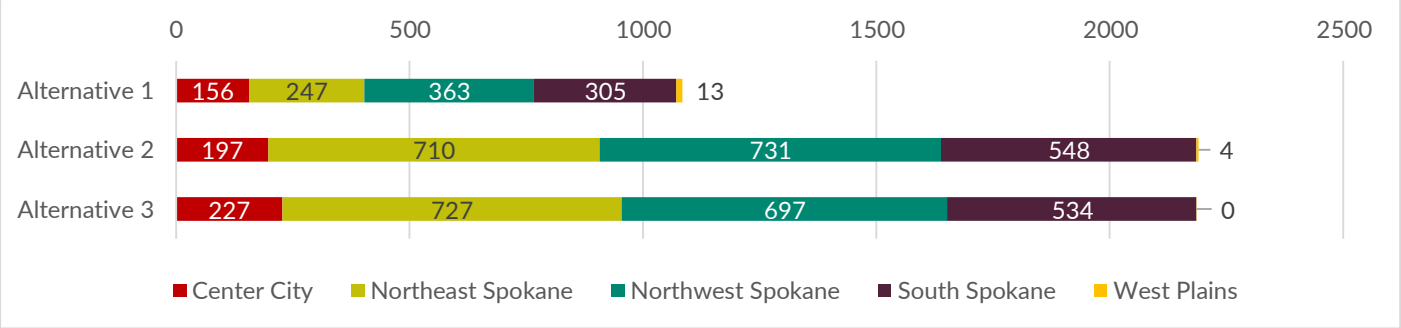
Exhibit 3.5-35. Projected Housing Units Demolished by Affordability Level



Sources: City of Spokane, 2025; BERK 2025.

Exhibit 3.5-36 shows projected demolished units by study area. There would be a similar number of demolished units in Northeast, Northwest, and South Spokane under Alternatives 2 and 3. There are slightly more units demolished in Center City under Alternative 3 than Alternative 2.

Exhibit 3.5-36. Projected Housing Units Demolished by Study Area



Sources: City of Spokane, 2025; BERK 2025.

Exhibit 3.5-37 shows the expected units demolished by the area's displacement risk score. With more growth focused in already developed areas along corridors and centers such as Division, Center City, and others, there is more development expected in areas with high displacement risk under Alternatives 2 and 3, compared to Alternative 1. This results in significantly more homes demolished in these areas. However, the flipside is also true. These neighborhoods would also receive more new housing production and greater diversity of housing options. Alternatives 2 and 3 will incorporate anti-displacement measures that mitigate displacement risk. This is expected to reduce economic displacement pressure compared to Alternative 1. See **Exhibit 3.5-38.**

Exhibit 3.5-37. Projected Units Demolished by Displacement Risk Score

Displacement Risk Score	Displacement Risk Level	Alternative 1	Alternative 2	Alternative 3
1	Low	127	87	44
2		163	171	170
3	Medium	332	182	220
4		121	345	379
5	High	341	1,404	1,372
	Total	**1,084**	**2,190**	**2,185**

Sources: City of Spokane, BERK 2025.

Exhibit 3.5-38. Potential to Reduce Economic Displacement Pressure

Ability to Reduce Economic Development Pressure	Alt 1	Alt 2	Alt 3
Potential Capacity for New Housing Production	○	●+	●+
Potential Capacity to Increase Housing Diversity	○	●	●+
Anti-displacement Measures included in Plan and Programs	○	●+	●+

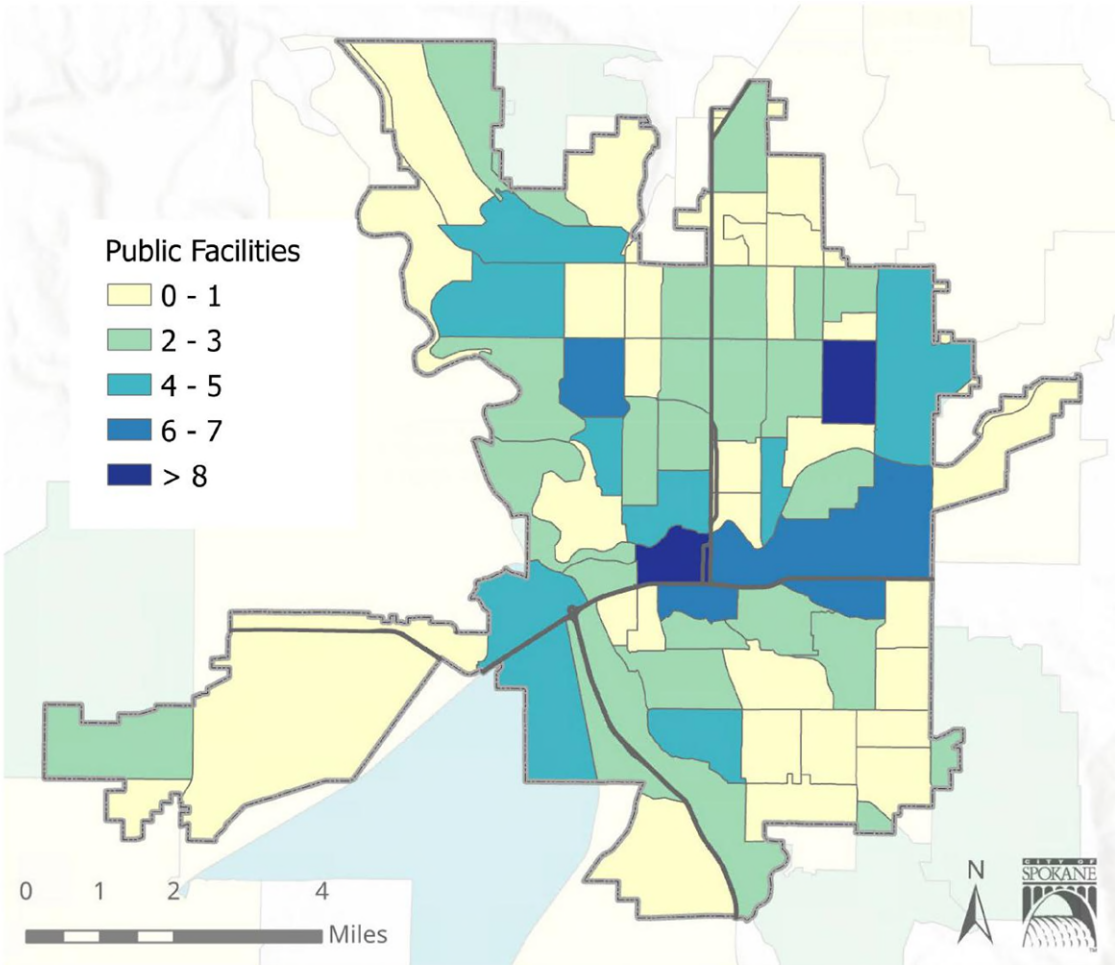
Legend: ○ = partially supports ●=supports ●+ = optimally supports

Housing in Connected and Accessible Neighborhoods (transit, libraries, parks)

Community Amenities

Community amenities such as schools, libraries, parks, and community centers provide important educational, social, and recreation resources that enhance livability. However, studies have shown that housing costs can rise faster in the vicinity of these amenities, such as next to new parks and parks in downtowns (Trust for Public Land, 2024). Housing and property values support school funding through property taxes and more funding for schools can support home appreciation (Savageau, 2023). Multiple amenities are near each other in the downtown, Liberty Park, the Northeast Community Center, and Shadle Park, including in several tracts considered to have higher displacement risk. See **Exhibit 3.5-39**.

Exhibit 3.5-39. Amenities by Census Tract: Schools, Libraries, Parks, and Community Centers



Source: (City of Spokane, 2025)

Transit and Home Values

A 2017 study of bus rapid transit (BRT) and home prices found that BRT routes positively impact surrounding single-unit home sale prices, with closer homes having higher sales prices than those located further from the route (Perk, 2017). A study of development along BRT and household socioeconomics in Vancouver, B.C. found "proximity to rapid transit infrastructure increases the attractiveness of nearby areas and results in a larger share of higher-income renters who can potentially price out lower-income households if the supply of affordable housing remains the same" (Kapatsila, 2024). The study notes examples of pairing transit-oriented development and affordable housing policies to increase affordable housing supply as part of transit system planning in the Puget Sound and Portland, Oregon.

A July 2025 study by the Urban Institute for Washington State regarding transit-oriented development (TOD) and transit found that, of the cities studied in Washington state, Spokane had limited transit and low housing costs, and average rents near Spokane's BRT stations are lower than those in the rest of

the city. Spokane was considered to be a community with "limited transit, low housing costs" along with Everett and Tacoma, as well as others. As a group, the study found:

- Attracting development, especially retail, is hard because of limited market demand.
- Rents are increasing more quickly than incomes, putting families at risk.
- Many people living near transit do not take advantage of the system.

In higher cost cities with more ample transit like Seattle, Bellevue, and Redmond, the study found some gentrification may be occurring near transit where households with higher incomes are choosing to move. Overall, the study indicates that "displacement of residents with low or moderate incomes may … be occurring near transit in some cities. But we caution that we have inadequate evidence to definitively prove whether displacement is occurring. It is possible that some families with low incomes may choose to pay more for housing in exchange for the reduced transportation costs made available thanks to transit investments." The report recommends developing higher housing densities and encouraging small businesses near transit routes, funding infrastructure grants to lower tax base municipalities along transit routes, reducing pollution exposure of highway-adjacent transit areas, and investing in affordable housing. It also recommends expanding the capacity of public entities, including transit agencies, to facilitate housing development (Urban Institute, 2025). It identifies the benefits of increasing densities near transit under HB 1491 and offers recommendations to further improve the law with infrastructure investment funds and minimum floor area ratios.

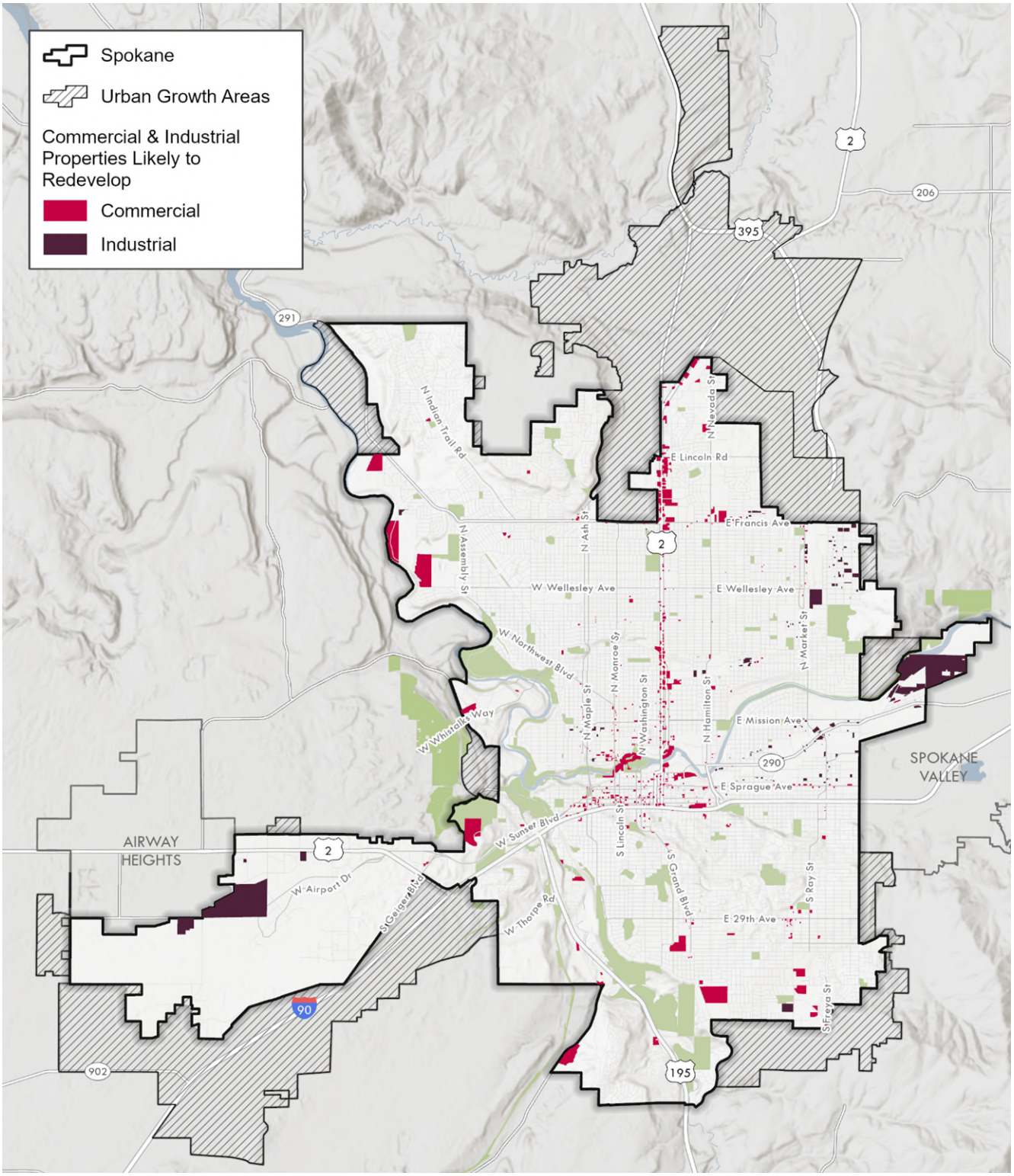
Commercial and Industrial Business Displacement

This evaluation considers the potential that commercial or industrial buildings and businesses could see investment or change where there are:

- Commercial and industrial buildings on "underutilized" parcels where parcel value is higher than building value.
- Commercial and industrial buildings built pre-1985.

The parcels with these characteristics are shown in **Exhibit 3.5-40.**

Exhibit 3.5-40. Commercial and Industrial Properties likely to Redevelop



Sources: Spokane County Assessor, BERK, 2025.

If the alternatives apply land use designations and implement zoning with limitations on employment, there could be displacement of existing buildings. If the alternatives increase allowances for mixed-uses or housing existing businesses may be displaced or unable to afford new space in mixed use developments due to rising costs; however, it is also possible that added residents in or near commercial areas can provide additional customers allowing businesses to successfully occupy new space.

In areas where the land use designations and implementing zones remain similar (such as industrial areas), these sites may be good candidates for further investments in commercial or industrial uses. Zoning in the Division Corridor is largely multi-unit and commercial under Alternative 1. The number of parcels that could be redeveloped is high and more intense residential density could lead to displacement under Alternatives 2 and 3. Recent studies suggest that gentrification is not happening near transit; however, rents are increasing faster than incomes in the cities that, like Spokane, have less transit use and are lower cost cities (Urban Institute, 2025). See **Exhibit 3.5-41.**

The alternatives largely plan for industrial, both light and heavy, in similar locations as zoned under Alternative 1, but more intense employment is planned, particularly under Alternative 3. There are parcels with older industrial buildings that could see change such as the addition of new businesses but still remain industrial.

Exhibit 3.5-41. Employment Growth and Potential for Redevelopment and Displacement

Region	Alternative 1	Alternative 2	Alternative 3
Northwest	In areas with redevelopable properties, there could be moderate growth on W Northwest Blvd, N Monroe Street and N Maple Streets. Moderate potential for displacement.	Distributed mixed-uses and commercial uses on corridors at a slightly lower level than Alternative 1. Lowest potential for displacement.	Greater growth along selected corridors particularly north-south corridors like N Monroe and to W Northwest Blvd. Greater potential for displacement.

Region	Alternative 1	Alternative 2	Alternative 3
Northeast	Moderate growth on corridors such as E Francis Avenue, E Fairview Avenue, E North Foothills Dr, and N Market Street. Moderate growth in Hillyard on redevelopable properties. Continued, expanded, or new industrial uses.	Higher growth on more corridors with existing businesses such as E Francis Avenue and portions of N Hamilton Street. Moderate growth in Hillyard on redevelopable properties. Continued, expanded, or new industrial uses.	Higher growth on selected corridors such as the E Mission Avenue corridor and portions of N Hamilton Street. Moderate-high job growth in Hillyard on redevelopable properties. Continued, expanded, or new industrial uses. Higher displacement due to North Spokane Corridor. Higher residential displacement risk could affect cultural institutions and local businesses.
Division	Moderate growth with potential to change redevelopable properties along Division Street. Moderate potential for displacement.	Focused mixed-use growth at north and south ends of Division Street with modest job growth in between. Lesser potential for redevelopment or displacement.	Greater growth and wider extent along the corridor with greater potential for redevelopment or displacement.
Center City	Moderate growth in North Bank, Downtown Core, and Medical District, and lower growth in South Logan. Moderate potential for displacement.	Moderate growth in Medical district. Moderate potential for displacement. Planned growth in South Logan per new subarea plan.	Greater job growth in Downtown Core, North Bank, and Medical District. Greater potential for displacement. Planned growth in South Logan per new subarea plan.
South	Higher growth in smaller nodes along corridors with S Grand, E 29th Avenue, and S Regal and S Freya Streets. Higher potential for displacement.	Moderate growth along corridors with S Grand, E 29th Avenue, S Regal, and S Freya Street. Moderate potential for displacement.	Less area identified for change than Alternative 2. Moderate-higher job, particularly along southern end of transit corridors. Moderate potential for displacement.

Region	Alternative 1	Alternative 2	Alternative 3
West Plains	Moderate industrial growth in airport vicinity; much land in the area is vacant. Displacement is not anticipated though expansion and further investment is possible.	Moderate industrial growth, with more north of airport. Displacement is not anticipated as described under Alternative 1.	Moderate-higher industrial growth in airport vicinity throughout airport vicinity. Displacement is not anticipated as described under Alternative 1.

Sources: SRTC, 2022, BERK 2025.

Employment

Employment types, employment levels, and proximity of housing and jobs are key topics for the Land Use, Housing, and Economic Development elements under the Periodic Update (see **text box**). The employment thresholds of significance examined include:

- Ability to adversely affect citywide Jobs/Housing balance.
- Job types and quantity and ability to advance City and regional economic development strategies.

The City of Spokane is a job hub in the Inland Empire, and there are slightly more jobs in relation to housing units. A higher ratio of jobs to housing could increase commuting into the city unless there is an increase in housing at all affordability levels to accommodate commuters.

Balance of Jobs and Housing

Some communities may wish to seek a greater balance of jobs and housing for more complete neighborhoods where people can live and work in the same area. This proximity improves work-life balance, reduces greenhouse gas emissions, and improves overall quality of life. This may require stronger policies to support new businesses and appropriately zoned land. If the economic development strategy will attract more employers and new jobs, it should also consider housing for those new workers and their prospective incomes. (Washington State Department of Commerce, 2023)

Alternatives 1 and 3 increase the share of jobs relative to housing whereas Alternative 2 generally holds the current jobs/housing balance. See **Exhibit 3.5-42**.

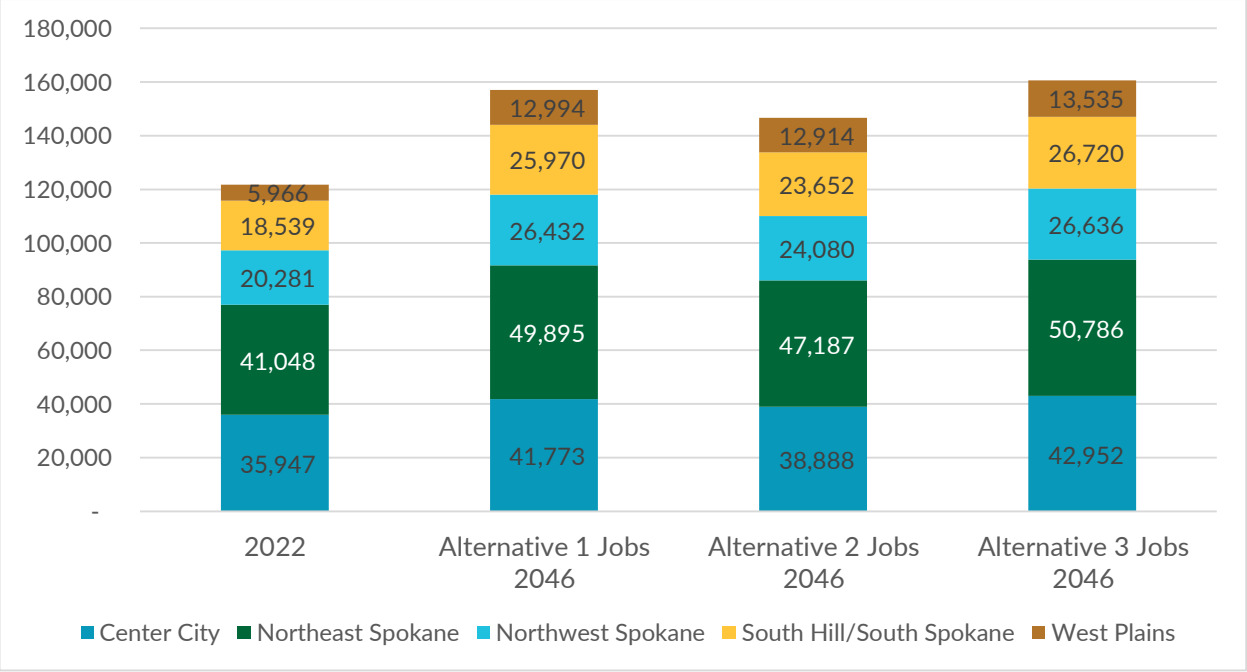
Exhibit 3.5-42. Jobs/Housing Balance

	2022		ALTERNATIVE 1		ALTERNATIVE 2		ALTERNATIVE 3	
	Jobs	Housing	Jobs	Housing	Jobs	Housing	Jobs	Housing
Totals	121,781	101,774	157,065	123,512	146,720	123,512	160,629	123,512
Jobs/ Housing Ratio		1.20		1.27		1.19		1.30

Source: SRTC 2022, BERK 2025.

Under all alternatives, most jobs are in Northeast Spokane and Center City. West Plains will see a large change compared to present. Job increases in Northwest Spokane will be modest. See **Exhibit 3.5-43**.

Exhibit 3.5-43. Jobs in Study Areas by Alternative



Sources: SRTC 2022; BERK 2025.

Detailed job sector projections are not available for 2046 but based on historic trends and mid-period projections for 2034 by the Spokane Workforce Council shows continued growth in healthcare and other services. (Spokane Workforce Council, 2025)

Alternative 1: No Action, Stay the Course

Alternative 1 No Action, Stay the Course provides capacity for total housing targets and partially meets the housing targets by affordability for those with incomes at 80-120% and above AMI. Alternative 1 incorporates housing policy and code changes made as a result of the HAP such as middle housing and targeted investment areas, but it does not update the housing element and would not make additional changes to undo racially disparate impacts and address displacement from past decades of planning that prioritized single unit zoning and less investment in formerly redlined areas, and it would not add code amendments to streamline permitting as recommended in the Housing Action Plan (City of Spokane, 2021). Alternative 1, however, would meet population targets.

Alternative 1 would have a lower share of multi-unit housing forms than alternatives 2 and 3. It does not include the new housing and jobs anticipated in the South Logan Subarea Plan.

Alternative 1 provides mid-range jobs and focuses the jobs in center and corridors. It does not update economic development element policies and would not address additional commercial displacement

strategies. It would increase the jobs-housing ratio which assumes a higher rate of jobs than historically achieved. (See **Section 3.7 Transportation**.)

Alternative 1 provides more housing on vacant land and would have less physical displacement impacts than Alternatives 2 and 3 but it would not increase capacity for housing most likely to be affordable to lower income households and it would have a greater potential for adverse impacts in terms of economic displacement pressure.

Alternative 1 does not propose changes to land use designations or development standards around the City Line BRT stations. It would not meet the provisions of HB 1491 for a 3.0 FAR in each BRT station area in the Chief Garry Park vicinity. It would not provide additional anti-displacement measures in the Comprehensive Plan.

Alternative 2: Distributed and Balanced

Alternative 2 Distributed and Balanced provides capacity for total housing targets and fully meets the housing targets by affordability for all incomes by providing more mixed-use and residential medium and high intensities designed to support low- and mid-rise development that is more affordable. There would be a higher share of multi-unit housing compared to Alternative 1. Alternative 2 would include the new housing and jobs anticipated in the South Logan Subarea Plan.

Alternative 2 has the potential to displace existing housing particularly single-unit detached homes and some multi-unit homes (see Impacts Common to All Alternatives) but there is a greater capacity for housing supply that should reduce the pressure of economic displacement. Compared to Alternative 3, Alternative 2 is anticipated to have slightly more units demolished at 50-80% AMI and 80-120% AMI levels and slightly less at the 120%+ AMI level. Alternative 2 would also establish anti-displacement housing policies. See Mitigation Measures particularly **Exhibit 3.5-44**. With most units demolished likely being single-unit, either owner or rental, anti-displacement programs addressing ownership housing or housing choice may be appropriate. Anti-displacement measures that promote low-rise and mid-rise housing along frequent transit routes would assist in providing housing that is more affordable, such as increasing allowable building heights along transit corridors.

Alternative 2 fully updates the housing element. Racially disparate impacts are addressed by allowing for more forms of ownership housing (e.g., co-housing) and multi-unit developments in single unit dominated areas, as well as where there is more investment in transit. In support of the Housing Action Plan, Alternative 2 adds code amendments to streamline permitting through an infill exemption and raising SEPA thresholds (City of Spokane, 2021). Alternative 2 would meet population targets.

Alternative 2 increases jobs along corridors and adds mixed-use zoning in more locations, and has the potential to displace existing businesses along more corridors than Alternative 3, but measures to reduce business displacement could be implemented per **Exhibit 3.5-44**. Its balance of jobs and housing is similar to the ratio found today. It has fewer total jobs than Alternatives 1 and 3. (See **Section 3.7 Transportation**)

Alternative 2 updates economic development element policies and addresses additional commercial displacement strategies.

Alternative 2 proposes Mixed Use Commercial and High-Density Housing along the Center Line in the Chief Garry Park Vicinity. This could result in implementing zoning addressing the FAR requirements of HB 1491. Alternative 2 also proposes anti-displacement policies which would be important in the context of housing intensification along the TOD route.

Alternative 3: Center City and Regional Hubs

Alternative 3 meets all housing targets at all affordability levels like Alternative 2. It increases the share of multi-unit housing in low- and mid-rise formats to help close the gap in housing affordable to those with incomes of 0-80% AMI. As with Alternative 2, there would be a higher share of multi-unit housing compared to Alternative 1. Alternative 3 would include the new housing and jobs anticipated in the South Logan Subarea Plan.

The housing intensities would be highest in Center City and selected corridors like Division and where there is frequent transit, such as along Routes 4 and 23 that extend from the Northwest to the South. Compared to Alternative 2, Alternative 3 is anticipated to have slightly fewer units demolished at 50-80% AMI and 80-120% AMI levels and slightly more at the 120%+ AMI level. There is a potential for displacement of existing housing (see Impacts Common to All Alternatives) but there is a greater capacity for housing supply that should reduce the pressure of economic displacement. Like Alternative 2, most units that could potentially be demolished are single-unit, owner or rental, and programs that address both needs are important as shown in **Exhibit 3.5-44**. See Mitigation Measures below.

Similar to Alternative 2, Alternative 3 would also update the housing element and institute some actions to streamline permits as recommended in the HAP.

Alternative 3 provides the highest number of new jobs and would increase the jobs/housing ratio. It would boost jobs in the larger job hubs in Center City such as in the Medical District and University District as well as the Downtown Core. (See **Section 3.7 Transportation.**) It has the potential to displace some existing commercial jobs on corridors, but fewer corridors would be affected, and existing job hubs would be a focus of new jobs, compared to Alternative 2.

Like Alternative 2, this alternative addressing Center City and Regional Hubs updates economic development element policies, together with additional commercial displacement strategies.

Similar to Alternative 2, Alternative 3 proposes Mixed Use Commercial and High-Density Housing along the Center Line in the Chief Garry Park Vicinity, which should support consistency with requirements of HB 1491. Likewise, anti-displacement policies which would be important in the context of housing intensification along the TOD route.

3.5.3 Mitigation Measures

Incorporated Plan Features

PlanSpokane 2046 includes an updated housing element that addresses housing growth targets at all income levels. It also includes an evaluation of racially disparate impacts and displacement and makes adequate provisions to remove barriers to housing.

The City is updating its Economic Development Element to address the 2026-2046 period.

Regulations and Commitments

The City of Spokane's 2021 Housing Action Plan provides short, medium, and long-term strategies to address the community's housing needs. A number of strategies have been implemented as described in **Exhibit 3.5-33**.

StartUp Spokane is a program of Greater Spokane Inc., which in partnership with the Spokane Public Library and Spokane County Library provides business resources for entrepreneurs.

The Small Business Administration Strategic Alliance Memorandum was signed by the U.S. Small Business Administration, City of Spokane, and the AHANA Multi-Ethnic Business Association in September 2022. It establishes a heightened level of commitment to work together to bring services to underserved populations of entrepreneurs.

Other Potential Mitigation Measures

Residential Anti-Displacement Strategies

The City's Housing Action Plan (City of Spokane, 2021) identifies potential displacement risk and evaluates potential strategies. It recommends additional research and ongoing monitoring of displacement factors. The City is developing its suite of policies in the updated housing element based on the City's RDI evaluation. See **Exhibit 3.5-44**.

Exhibit 3.5-44. Summary Matrix of Housing and Business Anti-Displacement Measures

Measure	Details	Target
Community Engagement	Engage early and often with neighborhood stakeholders to ensure all voices are heard.	Community

Measure	Details	Target
Rental Assistance Fund	A Rental Assistance Fund is a relatively low-cost way to minimize the impacts of displacement on the most economically vulnerable populations. The Fund could be capitalized through development-related fees or through government or grant subsidy. The Fund would be available to those residents needing relocation cost assistance or to cover security deposit requirements or moving expenses.	Community
Tenant Protections	Support residential anti-displacement strategies for tenants, including relocation assistance, rent stabilization, and 'right to return' policies that give highest preference for housing support due to displacement from new development	Community, Residential
Community Preference Program	Consider a "community preference" policy which establishes preference for existing residents of the community in applications for affordable housing units to allow for disadvantaged residents of high displacement areas to access priority to new affordable housing units which could directly address displacement.	Community, Residential
Right-to Purchase Programs	Provides tenants and cities with the right to purchase government-assisted multifamily rental properties and mobile home parks when the owner decides to sell a property or exit an affordable housing program. This right is typically provided to qualified nonprofit organizations with the intent to keep current tenants housed and to prevent disruption of residence.	Community, Residential
Community Land Trusts	Land acquired by public agencies, nonprofits, or community-based organizations that maintain permanent ownership of land. Prospective homeowners are able to enter long-term (i.e., 99-year), renewable leases at an affordable rate. Upon selling, homeowners only earn a portion of the increased property value, while the trust keeps the remainder, thereby preserving affordability for future low- to moderate-income families.	Community, Residential

Measure	Details	Target
Housing Rehabilitation	Promote City programs that support affordable homeownership, including single-unit rehabilitation programs and essential home repair programs to help low- and moderate-income homeowners with home maintenance for health and safety.	Residential
Land Bank	Land banks can used in service of other forms of public benefit, which might include in the creation of affordable housing and the development of properties which offer below-market commercial space, both of which contribute directly to anti-displacement goals.	Residential
Use of Development Agreements	A development agreement is a contract between a city and a property owner which summarizes responsibilities associated with redevelopment of land. Development agreements are highly customized and specific to a particular site to maximize public and private benefits. Development agreements can be a useful tool to document an agreement between the City and the property owner to guide development towards certain policy goals, including the creation of housing.	Residential
Minimum Density Requirements	Setting a right-sized minimum density to be structured as an incentive rather than as a requirement. If the density requirement is set at too high a level, development could be discouraged in the near- and medium-term, a counterproductive and unintended consequence. If the requirement is too low, opportunities to add density in strategic locations could be less than capacity.	Residential
Credit support for small-scale developers	Lack of sufficient financial capacity is typically the primary barrier to financing of small projects and stands in the way of a citizen-developer corps who can do the hard but valuable work of locally-led, tactical, small-scale development.	Residential
Subsidy for less common ownership models	Land trusts, limited-equity cooperatives, and co-housing are relatively rare in the United States, but can be powerful models for long-term affordability and anti-displacement protection.	Residential
Middle Housing	Continue to remove barriers to the development of middle housing, which can provide for greater housing choice and affordability.	Residential

Measure	Details	Target
Affordable Housing Density Bonus	In Spokane, projects with 25% or more units designated as “affordable” are granted expanded ground floors (building coverage) and additional floor area. Affordable housing bonuses can expand beyond these provisions to include bonus height, density, and waivers to typical costs such as off-site infrastructure impact fees.	Residential
Public Investments In Infrastructure To Support Development	Building housing along older commercial corridors can involve hidden risks and challenges. Chief among those risks is uncertainty and cost associated with older infrastructure like sewer, water, and electricity. Cities, regional governments, and states can play a role in accelerating housing production by making investments in aging sewer, water, and electric infrastructure at a neighborhood-wide scale to reduce financial barriers to housing development.	Residential
Low-Cost Rental Housing Preservation	Preventing displacement and preserving "naturally occurring" affordable housing through acquisition, low-interest loans/revolving loan fund for preservation, and/or code enforcement. Example: The Oregon Legislature committed $15 million in lottery bonds to Oregon Housing and Community Services (OHCS) in 2019 to create a naturally occurring affordable housing loan fund modeled after the Greater Minnesota Housing Fund. Encourage the use of historic preservation credits and grants for multi-unit housing where the building would retain that housing after preservation.	Residential

Measure	Details	Target
Public Development Authority ("PDA")	PDAs play a critical role in addressing displacement pressures arising from rising housing costs and gentrification in urban environments. These authorities can implement a range of strategies to promote equitable development and prevent the displacement of vulnerable residents and businesses. Consider structuring PDAs to respond to community needs, like the example of Cultural Space Agency (CSA) in Seattle, which is a Public Development Authority that secures long-term affordable cultural space with community partners. Cultural spaces forestall cultural displacement by giving community members a place to assemble, organize, celebrate, and create a sense of connection. CSA partners with communities of color to create opportunities for ownership of commercial cultural space.	Commercial, Residential
Reduce or Eliminate Minimum Parking Requirements	Reduce or eliminate parking requirements, in exchange for a contribution in lieu which furthers the public benefit.	Residential, Commercial
Building Heights	Support increasing allowable building heights along transit corridors. Consider pairing with neighborhood Design Standards, especially in critical, high visibility areas.	Residential, Commercial
Commercial Anti-Displacement	Create and implement commercial anti-displacement strategies to keep and give preference to local, historic, and unique businesses in redevelopment	Commercial
Flexibility for Ground Floor Retail Requirement	Flexible ground floor standards that permit but do not require retail, or require a smaller portion of the ground floor (e.g., corner space of buildings at intersections), would allow opportunities for retail to flourish in the right locations without also creating an impediment to new housing construction. Certain ground floor design or construction standards such as minimum floor heights can be employed to ensure flexibility to convert residential or "flex" space to convert to retail over time should demand for retail space increase in a particular location.	Commercial

Measure	Details	Target
Tax Increment Financing ("TIF")	Tax Increment Financing (TIF) can be used for the "purchasing, rehabilitating, retrofitting for energy efficiency, and constructing housing for the purpose of creating or preserving long-term affordable housing," RCW.39.114. The City currently only has one such TIF operating, with other opportunities possible.	Commercial
Facilitate Public-Private Partnerships	Partner with institutional partners, like universities, to support business and economic development in strategic areas.	Commercial
Business Improvement District ("BID")	BID could have as a guiding philosophy the support of new and preservation of existing local businesses, along with provision of funding programs, advisory services, and political advocacy.	Commercial
Affordable Commercial Tenanting	Provides public subsidy of commercial rents for qualified tenants in new construction. In Portland, OR, the City's Affordable Commercial Tenanting Program addresses the displacement of small businesses from Portland's urban neighborhoods. The program provides incentives to property owners in exchange for below-market rents for commercial tenants. Tenants must satisfy certain conditions including revenue thresholds, cultural contributions to the neighborhood.	Commercial
Small Developer Technical Assistance	Small loans ($20,000-$50,000) coupled with technical assistance to help local land owners and entrepreneurs build new development or renovate existing structures. Program features low-barrier underwriting, and very low or no interest.	Commercial
Storefront Improvement Program	Grants (typically <$50,000) for small-scale revitalization projects such as rehabilitation of street-facing building facades including storefronts, cornices, gutters and downspouts, signs and graphics, exterior lighting, canopies and awnings, painting and masonry cleaning, and limited security and accessibility improvements.	Commercial
Small Business Alliance	Develop a business association focused on small or home- based businesses. Ensure this group is narrowly focused on issues impacting the neighborhood. Should be facilitated by City staff who can also provide technical assistance.	Commercial

Measure	Details	Target
Local Vendor Collective	Resources to support home-based and other businesses without brick-and-mortar space. In Vancouver, BC, the vendor's collective offers vending opportunities to low-income artists, craftspeople, and entrepreneurs with experience in the informal economy. Resources could include booths and/or table space, publicity and event organization, dedicated space for vending activities.	Commercial

Source: (City of Spokane, 2025)

3.5.4 Significant Unavoidable Adverse Impacts

Over time, additional growth and development will occur through redevelopment as well as on vacant land. The alternatives vary based on the types and geographic pattern of existing housing and businesses that may be demolished and replaced by new growth. While this can contribute to the risk of physical displacement, the benefits in terms of reduced economic displacement pressure and increased production of affordable units offered by the action alternatives would address affordability in the marketplace, and the City's new policies and codes would address anti-displacement measures. Therefore, no significant unavoidable adverse impacts to population, employment, or housing are expected under any alternative.

3.6 Relationship to Plans, Policies, and Regulations

The City of Spokane's last periodic update of the Comprehensive Plan was approved in 2017, with amendments last approved in 2023. This Comprehensive Plan Update is the next major periodic review to evaluate the Comprehensive Plan for consistency with the latest provisions of the State of Washington Growth Management Act (GMA), Countywide Planning Policies (CPPs), regional plans, and the community's vision. This section reviews adopted state, regional, and city plans and policies that guide growth in Spokane and evaluates the proposed alternatives for consistency. An impact is identified if the proposal would result in an inconsistency with adopted plans and policies. Mitigation measures to address identified adverse impacts and a summary of any significant unavoidable adverse impacts follow the description of existing conditions (affected environment) and impacts analysis.

Thresholds of significance utilized in this impact analysis include:

- Conflicts with the Washington State Growth Management Act or Spokane County Countywide Planning Policies.
- Inconsistency with adopted state, regional, county, or local plans and policies.

Per WAC 365-196-210, consistency means: *no feature of a plan or regulation is incompatible with any other feature of a plan or regulation. Consistency is indicative of a capacity for orderly integration or operation with other elements in a system*.

3.6.1 Affected Environment

The current policy and regulatory framework regulating land use in Spokane flows from the GMA, Spokane County CPPs, the City's current Comprehensive Plan, as well as implementation actions including development standards in the Spokane Municipal Code (SMC) and the Shoreline Master Program (SMP), which is not due for an update until 2030. Several other regulatory measures affect land use including regional strategic reports, localized subareas, overlay districts, adopted neighborhood plans, and design guidelines.

State and Regional Framework

Growth Management Act

Comprehensive Plans and development regulations within the City of Spokane must be consistent with the provisions of the Growth Management Act (GMA). Adopted in 1990, the GMA addresses concerns about the impacts of uncoordinated growth on Washington communities and the environment, and it provides a framework for land use planning and development regulations in the state. The GMA directs coordinated regional and countywide planning, which then informs the locally adopted comprehensive plans and development regulations of individual cities and counties. Key provisions of the GMA include:

- Planning Goals
- Land Designations
- Buildable Lands Program
- Countywide Planning Policies (CPPs)
- Local Comprehensive Planning

The GMA is primarily codified under Chapter 36.70A RCW. The Washington State Department of Commerce (Commerce) has published a series of amendments to the GMA from 1995 through 2025. In 2021, GMA goals and element requirements regarding housing were amended to require jurisdictions to plan for and accommodate housing that is affordable to all economic segments of the population and to identify and address racially disparate impacts in the housing element. (See Section **3.5 Population, Employment, and Housing**).

The GMA includes 15 planning goals, in no particular order, to help guide the development and adoption of local comprehensive plans and development regulations. GMA Goal 15 references goals and policies of the Shoreline Management Act. These goals direct most population and employment growth to be focused in urban areas to avoid sprawl, provide efficient and effective services and infrastructure within adopted levels of service, and protect environmentally critical areas. See **Exhibit 3.6-1**.

Exhibit 3.6-1 GMA Goals

GMA Goal	Text
(1) Urban Growth	Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.
(2) Reduce Sprawl	Reduce the inappropriate conversion of undeveloped land into sprawling, low density development.
(3) Transportation	Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled and are based on regional priorities and coordinated with county and city comprehensive plans.
(4) Housing	Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.
(5) Economic Development	Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing

GMA Goal	Text
	insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.
(6) Property Rights	Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.
(7) Permits	Applications for both state and local government permits should be processed in a timely and fair manner to ensure predictability.
(8) Natural resource industries	Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands and discourage incompatible uses.
(9) Open space and recreation	Retain open space and green space, enhance recreational opportunities, enhance fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.
(10) Environment	Protect and enhance the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.
(11) Citizen participation and coordination	Encourage the involvement of citizens in the planning process, including the participation of vulnerable populations and overburdened communities, and ensure coordination between communities and jurisdictions to reconcile conflicts.
(12) Public facilities and services	Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.
(13) Historic preservation	Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.
(14) 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.

GMA Goal	Text
(15) Shorelines	For shorelines of the state, the goals and policies of the shoreline management act as set forth in RCW 90.58.020 shall be considered an element of the county's or city's comprehensive plan.

Sources: RCW 36.70A.020 and RCW 36.70A.480(1), 2023.

Jurisdictions planning under the GMA are required to balance these goals in the development and adoption of their comprehensive plans and development regulations. Counties and cities in most parts of the state—including the City of Spokane—must prepare comprehensive plans that include objectives, principles, standards, and a future land use map. Required elements of the comprehensive plan include land use, housing, capital facilities plan, utilities, rural (for counties), transportation, economic development, parks and recreation, and climate change and resiliency. Local governments may include other elements if they wish. Development regulations, such as zoning, must be consistent with the local government's Comprehensive Plan. Counties and cities must be up to date with the requirements of the GMA, including the Periodic Update requirements, to be eligible for grants and loans from certain state infrastructure programs.

Countywide Planning Policies

The GMA requires counties and cities to collaboratively develop countywide planning policies (CPPs) to set the general framework for coordinated land use and population planning between a county and its cities to ensure comprehensive plans are consistent with each other (RCW36.70A.210). The role of the CPPs is to coordinate comprehensive plans of jurisdictions in the same county regarding regional issues and issues affecting common borders (RCW 36.70A.100).

The Spokane County CPPs were adopted December 22, 1994, and were last amended December 13, 2022. The CPPs aim to promote resident participation, neighborhood character, aquifer protection, environmental justice, environmental sustainability, urban growth areas, economic vitality, the Fairchild Air Force Base, and the Spokane International Airport.

Key topics covered by the CPPs include joint planning in the urban growth areas (UGAs) and the promotion of contiguous and orderly development and provision of urban services; retention of open space and development of parks and recreation; coordinated and efficient multimodal transportation systems based on regional priorities and corridors that can provide high-capacity transportation; the siting of capital facilities with active resident involvement; economic growth that protects Fairchild Air Force Base as a key economic resource; recognizes the environment as a regional economic asset; establishes regional planning relationships with adjacent counties and the State of Idaho; and enhancement of downtowns and commercial and industrial opportunities in cities.

The CPPs also aim to support affordable housing through the analysis of existing and projected housing needs, identification of sufficient land for housing, and adequate provisions of this need for all economic segments of the community, encouraging the development of diverse housing stock

accessible to a range of household type and promoting accessibility. It also promotes coordination of housing, transportation, and economic strategies. As part of the Periodic Update, Spokane County has updated its CPPs to better support affordable housing by meeting state requirements under HB 1110 and HB 1220. The amendments expand Policy Topic 7 to guide housing allocations, promote diverse housing for all household types, address racial disparities and displacement, preserve existing affordable housing, and coordinate housing with transportation and economic strategies. The update also adds a new policy topic on climate change and resiliency.

Housing targets were set considering GMA requirements and through a consultation process between Spokane County and each city. Through that process, the City of Spokane should plan for 22,359 dwelling units between 2020 and 2046. The City must also plan for housing targets by income band. See **Exhibit 3.6-2**. **Section 3.5 Population, Employment, and Housing** provides a discussion of affordable housing and the remaining need for 2023-2046.

Exhibit 3.6-2. Net New Housing Units and Emergency Housing Need, 2020-2046

Total Housing Need	0-30% AMI		30-50% AMI	50-80% AMI	80-100% AMI	100-120% AMI	>120% AMI	Emergency Housing
	Non -PSH	PSH						(Beds)
22,359	6,452	1,851	4,413	2,631	1,418	1,170	4,424	983

Notes: AMI = Area Median Income; PSH = Permanent Supportive Housing;
This is based on the Department of Commerce Housing Allocation Planning tool.
Source: City of Spokane, 2024.

Spokane Regional Transportation Council

The Spokane Regional Transportation Council (SRTC) develops policies and coordinates decisions about regional transportation over the next 20 years through its Metropolitan Transportation Plan (MTP) (Spokane Regional Transportation Council, 2025). Updated every four to five years, the MTP includes coordination with other local and regional planning efforts and includes: significant project, plans, and programs; key transportation challenges; future opportunities; regional growth projections; and strategies to meet future needs. SRTC is currently updating its long-range transportation plan, Horizon 2050. Horizon 2045 is the region's current long-range plan, adopted by the SRTC Board of Directors on December 9, 2021. It serves as both the regional transportation plan (RTP) and MTP for Spokane County. The SRTC has a role to certify transportation elements of comprehensive plans.

Horizon 2045 (Spokane Regional Transportation Council, 2021) is a plan for an integrated, accessible, and multimodal transportation system through 2045. It establishes guiding principles and policies to achieve the regional vision and align with statewide transportation goals. Its regional vision focuses on economic vitality, cooperation and leadership, stewardship, system operations, maintenance, preservation, safety and security, and quality of life. See **Exhibit 3.6-3**.

Exhibit 3.6-3. SRTC Horizon 2045 Topic Area Principles

Topic Area	Guiding Principles
(1) Economic Vitality 3 Policies	Promote economic vitality and prioritize transportation investment.
(2) Cooperation and Leadership 5 Policies	Provide a regional forum for transportation planning and funding.
(3) Stewardship 5 Policies	Protect the environment and minimize impacts from transportation.
(4) System Operations, Maintenance, and Preservation 2 Policies	Maximize the operations and physical condition of the transportation network.
(5) Safety and Security 4 Policies	Maximize operations and physical condition of the transportation network.
(6) Quality of Life 5 Policies	Improve choice and mobility.

Source: SRTC Horizon 2045.

Horizon 2045 estimates future conditions based on employment, housing, and employment density travel forecasting models. For the City of Spokane, Horizon 2045 anticipates concentrated growth and density through 2045, supporting density and development through the City's Centers and Corridors strategy. Housing density is anticipated in the Central Core of Spokane, specifically Downtown Spokane and West Central Neighborhood; in Northeast Spokane specifically along the Division Corridor and the neighborhoods of Shiloh Hills and Hillyard; and in South Spokane, specifically the Lincoln Heights neighborhood. Horizon 2045 anticipates employment growth in relation to activity centers in the Central Core of Spokane, along the Division Corridor, in Northeast Spokane near the Hillyard neighborhood, in West Plains, and in South Spokane near the Southgate and Lincoln Heights neighborhoods. Other areas include Northwest Spokane, specifically the Audubon/Downriver neighborhood.

Horizon 2045 anticipates growth outside of the City of Spokane throughout the region, particularly in the cities of Spokane Valley, Liberty Lake, and Airway Heights. The City of Spokane provides water service to parts of Airway Heights and Spokane Valley. Additional studies and plans conducted by SRTC include the Regional Safety Action Plan and DivisionConnects. These plans identify strategies for increasing the safety of multi-modal travel by changing street cross-sections to manage speeds and accommodate multiple travel options through infrastructure investments.

THRIVE Spokane – Comprehensive Economic Development Strategy

The Greater Spokane Inc. "THRIVE Spokane" is the region's five-year comprehensive economic development strategy (CEDS) developed in accordance with the US Economic Development

Administrations CEDS requirements. While it is not a regulatory requirement, it is a strategic framework that aligns economic development efforts, guides public and private investment, workforce development, and infrastructure priorities throughout the Greater Spokane region. It represents countywide economic development in collaboration with jurisdictions, community partners, education institutions, downtown associations, chambers, transportation councils, and community members. Alignment can support the Spokane region in pursuing federal and state funding. Updated in 2022, THRIVE Spokane and its action plan include the four following goals:

- **Goal 1: Recovery and Resiliency** – Target efforts that prepare the region to avoid, withstand, and recover from economic shocks and natural disasters.
  - Strategies and actions include investments to reduce employment barriers (e.g., efficient routes to connect workers to employment centers and development of a diverse set of attainable housing options), and investment in the development of downtowns and commercial centers, including pursual of redevelopment for mixed-income, mixed-use developments.
- **Goal 2: Competitiveness** – Position the Greater Spokane region as a strong competitor to attract talent, capital, and resources for strategic economic development.
  - Strategies and actions include equitable real estate development; investment in mixed-use projects; the expansion and preservation of a full range of housing options that target new housing developments in areas that connect low-income workers with growth employment centers; and exploration of zoning policy changes to reduce barriers to housing development,
- **Goal 3: Equitable Growth** – Seek to understand, address, and dismantle outcome disparity through intentional initiatives that include all Spokane residents in the benefits of economic growth and prosperity.
  - Strategies and actions include sustainable funding for coalitions accountable to the communities they serve, resources to build capacity and support BIPOC business owners, equitable economic and workforce development, reduction in barriers to public-private development projects and real estate development by community-based entities, recruitment and funding of housing industry innovators, and plan for the protection and incremental expansion of transportation-oriented business districts by increasing allowable housing and commercial districts.
- **Goal 4: Connectivity** – Promote the interconnectedness of Greater Spokane and drive cross—sector partnerships to align efforts that advance economic opportunity for all.
  - Strategies and actions focus on prioritized infrastructure investments, including prioritizing transit-oriented development, investment in public space activation, proactive engagement with community-based organizations, and investment prioritization in multimodal and intermodal transportation to maximize connectivity.

Local Framework

Spokane's Existing Comprehensive Plan

The City of Spokane's existing Comprehensive Plan, Shaping Spokane, is a 20-year vision and roadmap for Spokane's future (City of Spokane, 2023). The plan guides City decisions on where to build new jobs and housing, how to improve the transportation system, and where to make capital investments, such as utilities, sidewalks, schools, and parks. Shaping Spokane is the framework for the City's broad decisions on how to grow while recognizing and improving existing city neighborhoods.

The Comprehensive Plan was first adopted in 2001 consistent with the GMA. It was developed through Spokane Horizons, a community member participation process that involved all segments of the population to help shape the city's future. Since then, the City incorporated minor revisions and updates to the Comprehensive Plan on an annual basis, with significant periodic review updates completed in 2006 and 2017. The current plan was last amended in 2023. This Comprehensive Plan Update is the next significant periodic review.

The Shaping Spokane Comprehensive Plan Update consists of 14 elements – all of which will be reviewed and updated as part of the proposal:

1. Introduction
2. Implementation
3. Land Use Element
4. Transportation Element
5. Capital Facilities and Utilities Element
6. Housing Element
7. Economic Development Element
8. Urban Design and Historic Preservation Element
9. Natural Environment Element
10. Social Health Element
11. Neighborhoods Element
12. Parks and Recreation Element
13. Local Governance and Citizenship Element
14. Shorelines Element

The vision of the City of Spokane's Comprehensive Plan is:

> *"Spokane will be a city of people living and working together where diverse interests, including neighborhoods, business, education, and government, build upon the community's past accomplishments and heritage to ensure an exceptional sense of community, a healthy environment, and a high quality of life."*

The appendices include a summary of the GMA and CPPs, the full text of the CPPs as of 2011, the Horizons Process and the Ahwahnee Principle, the Capital Facilities Plan Technical Appendix, the Transportation Technical Appendix, Population Projections, Neighborhood Profiles, a Work Plan Matrix, Neighborhood Planning Resolutions, and Public Outreach conducted for the current Comprehensive Plan.

Land Use Element

The Land Use Element includes goals and policies that guide the physical form and activities allowed in the city, with policies under each goal that provide direction on implementation of these goals. See **Exhibit 3.6-4**.

Exhibit 3.6-4. City of Spokane Comprehensive Plan - Land Use Element Goals

Goal	Text
LU 1	**Citywide Land Use:** Offer a harmonious blend of opportunities for living, working, recreation, education, shopping, and cultural activities by protecting natural amenities, providing coordinated, efficient, and cost effective public facilities and utility services, carefully managing both residential and non-residential development and design, and proactively reinforcing downtown Spokane's role as a vibrant urban center.
LU 2	**Public Realm Enhancement:** Encourage the enhancement of the public realm.
LU 3	**Efficient Land Use:** Promote the efficient use of land by the use of incentives, density, and mixed-use development in proximity to retail businesses, public services, places of work, and transportation systems.
LU 4	**Transportation**: Promote a network of safe and cost effective transportation alternatives, including transit, carpooling, bicycling, pedestrian-oriented environments, and more efficient use of the automobile, to recognize the relationship between land use and transportation.
LU 5	**Development Character:** Promote development in a manner that is attractive, complementary, and compatible with other land uses.
LU 6	**Adequate Public Lands and Facilities:** Ensure the provision and distribution of adequate, public lands and facilities throughout the city.
LU 7	**Implementation**: Ensure that the goals and policies of the Comprehensive Plan are implemented.

Goal	Text
LU 8	**Urban Growth Area:** Maintain an Urban Growth Area that includes areas and densities sufficient to accommodate the city's allocated population, housing and employment growth for the succeeding twenty-year period, including the accommodation of the medical, governmental, educational, institutional, commercial, and industrial facilities related to such growth, but that does not exceed the area necessary to accommodate such growth.
LU 9	**Annexation:** Support annexations that enhance effective and efficient government.
LU 10	**Joint Planning:** Support joint growth management planning and annexation requests which best meet the Comprehensive Plan's development goals and policies.

The Land Use Element also includes a Future Land Use Map with several designations.

- Neighborhood Center
- District Center
- Employment Center
- Corridor
- Regional Center (Downtown)
- Center & Corridor Core
- Center & Corridor Transition
- Heavy Industrial
- Light Industrial
- General Commercial
- Neighborhood Retail
- Neighborhood Mini-Center
- Office
- Institutional
- Residential 15+
- Residential 15-30
- Residential 10-20
- Residential 4-10
- Agriculture
- Conservation Open Space
- Potential Open Space
- Open Space
- Mining

Centers and Corridors Growth Strategy

The City of Spokane adopted a planning strategy to focus growth toward centers and corridors (City of Spokane, 2025). Adopted in 2001 following a public outreach process called Spokane Horizons, associated land use policies implemented in December 2005 helped define key characteristics of these centers and corridors. These locations are characterized by the ability to accommodate new housing within a short walking or rolling distance of shopping, services, public transit, and other amenities. The planning strategy identified twenty-three centers and corridors throughout Spokane, ranging from neighborhood centers such as Garland Avenue and Perry Street to shopping destinations such as Shadle Park and Lincoln Heights. Associated policies and regulations aimed to support these locations and foster further investment in a mix of shopping, retail, services, and housing.

Center and corridor land use policies promote the efficient use of land by promoting density and mixed-use development in proximity to retail businesses, public services, places of work, and transportation systems. It is a strategy that directs growth to areas where adequate services and facilities are available. There are five different Center designations throughout the city (City of Spokane, 2023):

- **Neighborhood Centers:** Neighborhood Centers have a greater intensity of development than the surrounding residential areas. Businesses primarily cater to neighborhood residents in the form of convenience and service businesses. Density of housing supports frequent transit and neighborhood businesses. Buildings orient to the street to allow for a more inviting pedestrian environment, and the layout of buildings should promote active modes of transportation.
- **District Centers:** District Centers resemble Neighborhood Centers but allow for a greater intensity of all uses. District Centers serve a large portion of the surrounding neighborhoods and include gathering spaces, civic centers, large retail, and housing areas as part of a major activity hub. Buildings orient to the street and pedestrian access is vital to the surrounding residential areas. District Centers have frequent transit service, walkways, and bicycle paths
- **Employment Centers:** Employment Centers allow similar intensities of all use types as Neighborhood and District Centers, but include a strong, non-service oriented, employment component.
- **Corridors:** Corridors, the connection between Centers and the Downtown, allow higher intensities of all use types. They resemble District and Neighborhood Centers, but with a greater focus on improving the street network to allow people to move from one Center to the next via multiple modes of transportation.
- **Regional Centers:** Downtown Spokane is the only Regional Center and is the hub for shopping, dining, arts and culture, entertainment, and academics across the region.

Relevant Land Use Policies

- 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.

- LU 3.3 Designating Centers and Corridors – Designate new Centers and Corridors in appropriate locations on the Land Use Plan Map through a City-approved planning process.
- LU 3.4 Planning for Centers and Corridors - Conduct a City-approved subarea planning process to determine the location, size, mix of land uses, and underlying zoning within designated Centers and Corridors. Prohibit any change to land use or zoning within suggested Centers or Corridors until a sub area planning process is completed.
- LU 3.5 Mix of Uses in Centers - Achieve a proportion of uses in Centers that will stimulate pedestrian activity and create mutually reinforcing land uses.
- LU 3.6 Compact Residential Patterns - Allow more compact and affordable housing in all neighborhoods, in accordance with design guidelines.

In 2024, the City completed a study (Makers et al., 2024) to evaluate updates or changes to this growth strategy. While still designating centers and corridors in the land use map, the study recommends evolving the existing Center and Corridor zones into an updated family of mixed-use zones.

The study identified four key recommendations, including:

- Recommendation 1 – Establish a new set of mixed-use zones
- Recommendation 2 – Address allowed building height
- Recommendation 3 – Update block frontage standards
- Recommendation 4 – Increase connectivity

The recommended revisions to the zones seek to better align with current development practices and building styles, while maintaining support for the development of walkable street frontages and accessibility.

Capital Facilities Element and Capital Improvement Program

The Capital Facilities Element contains goals and policies that are carried forward with specific projects and matching revenues in a Capital Improvement Program.

- CFU 1 Adequate Public Facilities and Services - Provide and maintain adequate public facilities and utility services and reliable funding in order to protect investment in existing facilities and ensure appropriate levels of service.
- CFU 2 Concurrency - Ensure that those public facilities and services necessary to support development are adequate to serve the development and available when the service demands of development occur without decreasing current service levels below locally established minimum standards.
- CFU 3 Coordination - Promote contiguous, orderly development and provision of urban services through the regional coordination of land use and public services related to capital facilities and utilities.
- CFU 4 Service Provision - Provide public services in a manner that facilitates efficient and effective delivery of services and meets current and future demand.

- CFU 5 Environmental Concerns - Minimize impacts to the environment, public health, and safety through the timely and careful siting and use of capital facilities and utilities.
- CFU 6 Multiple Objectives - Use capital facilities and utilities to support multiple interests and purposes.

Annually, the City adopts a capital improvement program addressing a six-year period that includes major projects that work to address repair, replacement, and capacity related to growth. The current program is 2025-2030, and the City is currently processing the 2026-2031 update. The program addresses improvements towards the Spokane Police Department; the Spokane Fire Department; Spokane Parks & Recreation, including trail connections; transportation; water; wastewater; solid waste; information technology; the city-owned fleet services; and facilities management.

Other Elements

Other relevant elements to highlight in the existing Comprehensive Plan include Transportation, Housing, Economic Development, and Neighborhoods.

Transportation

The Transportation Element focuses goals and policies on promoting transportation choices and accessibility for all users, aligning transportation projects with economic vitality and land use objectives, prioritizing active transportation network projects and connectivity access in neighborhoods, improving multimodal transportation options particularly in Centers (e.g., District Centers, Neighborhood Centers, Employment Centers, Corridors, Downtown, and Regional Centers), and promoting safety and demand management to ensure efficient network capacity.

Housing Element

The Housing Element focuses goals and policies on promoting housing choice and diversity of housing types that are safe and affordable for all income levels; improving housing quality and encouraging home preservation and rehabilitation of older neighborhoods; encouraging home ownership; and encouraging housing for lower-income community members throughout the city.

Economic Development Element

Relevant goals and policies in the Economic Development Element focus on ensuring adequate supply of useable industrial and commercial property is available, including the support of mixed-use development to stimulate economic activity and vitality, promoting a range of employment and businesses.

Neighborhoods Element

The Neighborhood Element focuses on recognizing downtown Spokane as the primary regional economic and cultural center and as mixed-use neighborhood with a diversity of housing; developing neighborhoods that feel like small towns and provide a variety of compatible services; promoting

alternative modes of transportation and circulation in neighborhoods, including multimodal transportation; increasing open space, trails, and pedestrian connections within and between neighborhoods; protecting and enhancing the natural environment; and promoting social amenities and a sense of community.

Neighborhood and Subarea Plans

The 2001 Comprehensive Plan Update included policies that called for neighborhood planning (City of Spokane, 2025). In 2007, the City set aside $550,000 to be used for neighborhood planning, distributed funds, and created the Community Assembly to guide neighborhoods through the neighborhood planning process that identifies issues, solutions, and results tracking. The neighborhood plans can then be used to develop a project plan for a specific project (Track 1) , develop a visioning plan that may include specific requests for future land use revisions or amendments to the Comprehensive Plan (Track 2), or can be adopted by ordinance and incorporated into the Comprehensive Plan (Track 3) (City of Spokane, 2021). Of the neighborhood-focused planning efforts, the following have been adopted by ordinance and incorporated into the Comprehensive Plan:

- Spokane Downtown Plan, adopted in 2021.
- South University District Subarea Plan, adopted in 2020.

The neighborhood plans, with the exception of the above Downtown Plan, have not been adopted by ordinance.[10]

Northwest Spokane

Neighborhood Planning Efforts

These plans are the result of neighborhood planning efforts and, though not formally adopted into the Comprehensive Plan, are acknowledged by the City and play a role in guiding development and informing policy.

Emerson Garfield

Emerson-Garfield is a centrally located Spokane neighborhood just north of downtown, bounded roughly by Division Street on the east, Cora Avenue to the north, and portions of Indiana Avenue and Monroe Street to the south and west. The neighborhood action plan envisions Emerson-Garfield as "a diverse and vibrant neighborhood actively supporting a thriving business district, strong residential areas, beautiful parks, walkable amenities, and a unique historic character." (Emerson-Garfield Neighborhood Council, 2014). Key priorities identified through a collaborative planning process include pedestrian safety (addressing dangerous crossings, lack of sidewalks, and high-traffic arterials

[10] The City adopted the South Logan TOD Plan by resolution in 2024. It then implemented the TOD Plan's proposed land use and zoning through a comprehensive plan amendment.

like Monroe, Indiana, and Northwest Boulevard); neighborhood beautification; business diversity and occupancy; community resources; alternative and public transportation; and neighborhood connectivity and events.

The plan places particular emphasis on improving land use along the Monroe Street corridor and enhancing the pedestrian environment with complete streets strategies—such as crosswalks, ADA ramps, lighting, and traffic-calming measures. This top priority supported the development of the North Monroe Corridor Project 2018 (City of Spokane, 2016), a project to improve the Monroe Street Corridor by improving safety, enhancing the streetscape, and reconfiguring traffic on North Monroe Street. Construction began in 2018 (City of Spokane, 2018).

City Council recognized it by resolution in July 2014 (City of Spokane, 2014).

Five Mile Prairie

The Five Mile Prairie Neighborhood, located in the northwest corner of Spokane and bordered on three sides by unincorporated Spokane County, is primarily residential with two major parks, Sky Prairie Park and Austin Ravine Conservation Area. Its neighborhood plan focuses exclusively on improving pedestrian and bicycle safety and connectivity (Five Mile Prairie Neighborhood, 2012), outlining 21 capital improvement projects aimed at enhancing walking and biking facilities. Key priorities include creating safer routes for pedestrians and cyclists; improving connections between homes, schools, parks, and neighboring areas; and integrating local improvements with broader city policies and capital plans. The plan emphasizes linking residential areas with community destinations to encourage active transportation and reduce reliance on cars. It also identifies a potential future study area for additional planning and infrastructure needs. By targeting strategic connections and safety upgrades, the plan seeks to create a more accessible and connected neighborhood for all residents. City Council passed a resolution in 2012 to recognize the plan as a priority planning document for the neighborhood; the recommendations have not yet been incorporated in the Comprehensive Plan (City of Spokane, 2012).

North Hill

The 2015 North Hill Neighborhood Action Plan emphasizes connectivity, safety, livability, and a vibrant community (North Hill Neighborhood Council, 2015). Priorities include boosting commercial vitality in the Garland District; increasing safety; enhancing public spaces; implementing pedestrian connectivity and traffic calming measures; and preserving the South Bluffs as open space. The plan supports local businesses, mixed-use development along Division Street and the Garland District, and improved pedestrian and bike connections—especially between residential areas and the Garland District—within broader city transportation plans. Predominantly low intensity residential, North Hill also includes commercial and higher intensity areas along its eastern edge and in the Garland Neighborhood Center. Bounded by Francis Avenue, Division Street, Courtland and Cora Avenues, and Ash Street, it serves as a transition between downtown and northern residential neighborhoods. The City Council adopted the neighborhood plan by resolution in July 2015 (City of Spokane, 2015).

Shadle District (Northwest & Audubon / Downriver neighborhoods)

The Shadle Area Neighborhood Plan, adopted by resolution by City Council in 2019 (City of Spokane, 2019), provides a long-range vision to guide development in this designated District Center (SCJ Alliance, 2019). The plan emphasizes pedestrian-oriented, mixed-use growth supported by CC1 and CC2 zoning, encouraging diverse housing options such as townhomes, multi-units, and senior housing. It prioritizes public realm improvements—particularly along Wellesley, Belt, Alberta, and Ash—to slow traffic, improve walkability, and support mixed-use intensification. Key focus areas include enhancing transportation connectivity with safer crossings, bike access, and transit improvements; creating more housing diversity to support affordability and aging in place; and improving public spaces like Shadle Center and Shadle Park to foster community identity and accessibility. Investments aim to create strong pedestrian and bicycle links to surrounding neighborhoods, reduce surface parking, and encourage storefront-oriented development. The plan anticipates gradual transformation, with incremental public and private investment shaping the district's evolution into a vibrant center connected to other parts of Spokane through frequent and accessible transit.

West Central

Completed in May 2012, the West Central Neighborhood Action Plan outlines priorities across land use, transportation, community facilities, housing, design and historic preservation, parks and open space, social needs, and economic development (West Central Neighborhood, 2012). Key land use goals include attracting commercial and light industrial investment while protecting single unit residential areas through land use regulation enforcement. Transportation priorities focus on adding bike lanes and multimodal options to connect the neighborhood to downtown and expand options for low-income households. The plan calls for maintaining and improving community centers; encouraging homeownership and infill housing development; investing in historic streets and housing stock; protecting and enhancing open space; fostering a safe and inclusive community with opportunities for all ages; and supporting local businesses while attracting new economic investment. Located north and west of the Spokane River, the neighborhood is bounded to the south by West Indiana Avenue and to the east by North Monroe Street. Through these strategies, the plan seeks to preserve West Central's historic character while promoting growth, connectivity, and community well-being. The City Council passed a resolution in February 2013 to recognize the planning efforts of the West Central Stakeholder Group and the West Central Neighborhood Action Plan (City of Spokane, 2013).

Related planning in West Central includes programming of traffic calming and transportation improvements through the West Central Infrastructure Project. This neighborhood-led study, completed in 2024, reassessed and prioritized projects originally listed in founding legislation for the West Quadrant Tax Increment Finance District.

West Hills

West Hills Neighborhood developed the Fort George Wright Drive Station and Corridor Plan, with planning efforts focused on the Fort George Write Boulevard (now Whistalks Way) and Spokane Falls Community College area (City of Spokane, 2016). Plan development included collaborative efforts from

Spokane Falls Community College, Mukogawa Institute, Spokane Transit Authority, the West Hills Neighborhood Council, River Run PUD, and other entities. The plan focused on addressing immediate public safety needs, improving provision of transit, encouraging new land uses, boosting bike and pedestrian connectivity, and identifying supporting actions to develop a cohesive neighborhood center. The City Council recognized the Fort George Wright Drive Station and Corridor Plan by resolution in late 2016 (City of Spokane, 2016).

Future neighborhood planning projects

Future neighborhood planning projects in Northwest Spokane include Balboa / South Indian Trail.

Northeast Spokane

Hillyard Subarea Plan

The Hillyard Subarea Plan is a combined effort of the City of Spokane and the Northeast Public Development Authority (NEPDA) to define a vision for the Hillyard neighborhood in the northeast corner of the city (Northeast PDA, 2025). The City Council formally recognized and adopted the plan by resolution in November 2025.

Goals, strategies, and actions included in the plan are guided by the following vision to "rediscover Hillyard's history, assets, community, and potential through an actionable plan centered on physical enhancements, supportive infrastructure and land use planning." It is focused on six key vision themes that include: create distinctive places; enhance livability; achieve economic vitality; improve services; and identify implementation strategies.

The subarea plan addresses land use and infrastructure throughout the Hillyard neighborhood. The plan also identifies catalyst sites to help focus targeted redevelopment efforts, with the underlying zone driving the resulting development

South Logan TOD Plan

The South Logan Transit-Oriented Development (TOD) Project supports increased connectivity and livability in the South Logan area, located in the Logan neighborhood of Spokane. (City of Spokane, 2025). Its study area is focused on areas up to a half mile around three City Line bus rapid transit stations in the South Logan area of the Logan Neighborhood. This area includes the Hamilton Street Corridor, Gonzaga University, the new UW and Gonzaga health sciences center, Mission Avenue Historic District, local businesses and organizations, Mission Park, Upriver Park, Centennial Trail, and the Spokane River. The City Council approved the South Logan TOD Plan by resolution in early 2024, with land use and zoning changes as well as citywide and area-specific amendments to the Spokane Municipal Code approved later in 2024.

The South Logan TOD Plan (City of Spokane, 2024) values include enhancing connectivity, accessibility and mobility; supporting universities and health sciences; supporting job access, diverse industries, and employment; expanding housing options and affordability for residents of all incomes and ages;

minimizing residential and local business displacement; and building on the neighborhood's diverse urban context and history with integrity.

Plan recommendations include pairing transit infrastructure investments with targeted investments in public spaces; increasing active transportation connections and improvements; making strategic updates to zoning, design standards, and regulations to encourage private investment; and drawing in more businesses and residents to the area while also applying anti-displacement efforts to keep existing community members and anchors. Its efforts build on the Logan Neighborhood Identity Plan, adopted by resolution in May 2014, and the Hamilton Street Corridor form-based code, adopted by ordinance in 2015. Added as a new chapter to the Title17C Land Use Standards of the Spokane Municipal Code, the Hamilton Street Corridor form-based model code aimed to foster an economically vibrant, walkable, mixed-use environment along the Hamilton Corridor.

Neighborhood Planning Efforts

These plans are the result of neighborhood planning efforts and, though not formally adopted into the Comprehensive Plan, are acknowledged by the City and play a role in guiding development and informing policy.

Bemiss, Hillyard, and Whitman neighborhoods

The Greater Hillyard Northeast Planning Alliance (GHNPA) neighborhood strategic plan covers Bemiss, Hillyard, and Whitman neighborhoods in northeast Spokane (Greater Hillyard Northeast Planning Alliance, 2010). It identifies ten strategic areas, including parks and trails; housing and commercial buildings; public safety; economic development; transportation and infrastructure; and community organization. Land use priorities focus on maintaining and upgrading housing and enhancing commercial buildings. Community facility and infrastructure goals include improving parks and trails, as well as developing East Hillyard's industrial corridor and a Manufacturing Development Center. Organizational priorities call for stronger neighborhood-level structures to coordinate efforts and resources.

The plan's vision is for a safer, greener, and better-connected East Spokane, where housing and economic development thrive alongside community pride, civic engagement, and a positive neighborhood image. It promotes a collaborative approach among residents, nonprofits, neighborhood councils, businesses, and the City to implement a unified revitalization strategy. Through sustained partnerships, the three neighborhoods aim to foster economic opportunity, enhance livability, and strengthen the community's identity. GHNPA finalized its report and final proposals in 2010.

Chief Garry Park

The Chief Garry Park neighborhood is in the central section of northeast Spokane. It is predominantly comprised of single unit residential, with retail at Mission and Napa Street and near Spokane Community College. Prominent landmarks include Spokane Community College in the center of the neighborhood, Felts Field to the east, and Spokane River forming the northern border. The vision of its

neighborhood action plan identifies Chief Garry Park as a "strong residential neighborhood with thriving businesses, attractive and connected parks, and accessible transit and pedestrian amenities" (Chief Garry Park Neighborhood Council, 2017). The action plan focuses on pedestrian safety, beautification, economic development, connectivity, and preserving neighborhood character. Its priorities include encouraging higher density residential and mixed-use development near transit, particularly at Mission Avenue and Napa Street and Mission and Greene Street near City Line stations. Other priorities include placemaking strategies; pedestrian and trail enhancements, specifically toward the Iron Bridge; and identifying TOD that aligns with the City Line bus rapid transit. In 2017, the City Council passed a resolution recognizing the neighborhood action plan as a guide for the neighborhood's desired direction for local activities and priority projects (City of Spokane, 2017).

East Central

East Central is located in the southern part of Northeast Spokane, just east of Center City. It is between Division Street and Havana Street, with Interstate-90 running east-west through the neighborhood. It includes an employment center along Sprague Avenue, a neighborhood center along Perry Street, various neighborhood retail locations, and Liberty Park. To form the East Central Neighborhood Plan, the East Central Planning Stakeholder Group built on previous planning efforts in the neighborhood and prioritized making improvements to the Ben Burr Trailhead to help link the neighborhood more effectively to the Centennial Trail (East Central Neighborhood Partnership Center, 2006). The plan reflects a focused, project-based approach that upgrades recreational infrastructure and fosters connectivity within East Central. It was adopted as a neighborhood planning document by City Council resolution on March 27, 2006.

- **ReFIVE 5th Avenue Community Plan:** The City is currently in the planning process for the 5th Avenue community in the East Central neighborhood (City of Spokane, 2025). Located south of I-90 around the 5th Avenue corridor in the southeast section of the East Central neighborhood, the area includes the historical Black business district and diverse community organizations.

Nevada Lidgerwood Neighborhood

The Nevada Lidgerwood neighborhood is located in Northeast Spokane, approximately bound by Division Street to the west, Perry and Crestline Streets to the east, Lincoln Avenue to the north, and East Euclid Avenue to the south. Key streets include Nevada Street and Addison Street running north-south. In 2009-2010, neighborhood residents and businesses identified important issues and solutions to improve the neighborhood (EWU URP Program, 2011) (Eastern Washington University's Planning Team, 2011), which focused on non-motorized travel safety, traffic patterns, volume, and speed. City Council recognized the neighborhood's planning efforts by resolution in January 2012 (City of Spokane, 2012).

Future neighborhood planning projects

Other Future Neighborhood Planning Efforts

- **Shiloh Hills** – Annexed to the City in the 1960s, Shiloh Hills is a newer neighborhood that split from the Nevada / Ledgerwood Neighborhood; it is north of East Francis Street and west of North

Division Street. Recent planning efforts have focused on traffic calming efforts, including street art and traffic islands (Shiloh Hills Neighborhood Council, 2025).

Division Corridor

DivisionConnects and the Division Street TOD Project

In 2021 and 2022, SRTC and Spokane Transit Authority (STA) led a two-year transportation and land use study that identified opportunities and challenges on Division Street. The Phase 1 Corridor Development Plan was adopted by SRTC Board of Directors on June 10, 2021, and the Phase 2 Vision and Implementation Strategy was adopted by the SRTC Board on September 8, 2022.

Phase 1 evaluated bus rapid transit (BRT) along Division Street and other corridor transportation elements (SRTC; STA, 2021). Its findings focus on implementation steps that transition the corridor from local to BRT service, securing funding, finalizing station locations, and development of transit-supportive strategies including supportive land uses along the corridor and multimodal transportation modes.

Phase 2 focused on opportunities and challenges on Division Street with the completion of the North Spokane Corridor, including the evaluation of active transportation capital investments and areas where land use changes may occur to create TOD (SRTC, 2022). Phase 2 discusses revisiting zoning policies to achieve a mixed-use Division Street BRT corridor that optimizes TOD opportunities.

In 2024, the City, STA and the County initiated a joint planning effort, currently underway, to develop the Division Street Transit-Oriented Development Plan using funding from the Federal Transit Administration's Pilot Program for Transit Oriented Development. The plan focuses on aligning land use, zoning, and infrastructure to make the most of upcoming transit investments on the Division Street corridor. The final plan is anticipated in Winter 2025.

Related Neighborhood Plans

Other adopted subareas and neighborhood plans overlap with the Division Corridor. See the North Hill neighborhood plan in the **Northwest Spokane** section, and the **South Logan TOD Plan** and Nevada Lidgerwood neighborhood planning efforts in the **Northeast Spokane** section.

Center City

Spokane Downtown Plan

Approved by City Council and adopted as a subarea plan by ordinance in 2021, the Spokane Downtown Plan outlines the community's vision for the Downtown subarea through 2031 (Downtown Spokane Partnership, 2021). Through a collaborative process between the City and the Downtown Spokane Partnership, which oversees the Downtown Business Improvement District, the plan identifies five goals including:

- A connected and walkable Downtown.
- Thriving arts, culture and historic places.
- A great place to live, work, and play.
- Welcoming and engaging public spaces for all.
- A well-organized Downtown.

To align its goals and vision in the plan, it also identifies 15 priority actions including a focus on multimodal transportation and walkable pedestrian-focused street design; infill development focused on small businesses, start-ups, arts, and culture; and integrated parks and public space.

South University District Subarea Plan

The South University District lies south of the main University District campus (east of Downtown Spokane), south of the BNSF tracks up to I-90, and north of the South Hill medical district. Adopted by ordinance in 2020, the South University District Subarea Plan reaffirms and adopts the vision, goals, and policies for the district (City of Spokane, 2020). It outlines the City and East Central Neighborhood Council's priorities for new growth and investment, with the vision for it to emerge as a "true gateway."

Key themes addressed include land use transitions that align with pedestrian activity; transportation improvements prioritizing walking, biking, and transit; maintaining and adapting existing businesses and historic character; and fostering design through public realm enhancements and neighborhood revitalization. The vision places centers on Sprague and Sherman, the heart of a pedestrian-oriented innovation district. It envisions a lively, mixed-use "urban village" – retail, institutional, residential, artisan/light-industrial uses, housing diversity, public amenities, and walkable streets tying together universities, Downtown, and healthcare areas.

Other Plans

North Bank Subarea Plan

The key findings and issues identified in the Draft North Bank Subarea neighborhood plan (City of Spokane, n.d.) were incorporated into the Downtown Plan Update, adopted by City Council in 2021.

Transit-Oriented Development Framework Study

The Transit Oriented Development (TOD) Framework Study, conducted from 2021 to 2022, built on previous planning efforts including an economic impact study for the City Line in 2014 and a 2017 strategic overlay study for the City Line. The TOD Framework Study developed recommended updates to Center and Corridor zones and rezoning selected station areas, supporting future planning including the completed South Logan TOD Study and the ongoing Division Street TOD Plan. City Council adopted it by resolution in May 2022.

South Spokane

Neighborhood Planning Efforts

These plans are the result of neighborhood planning efforts and, though not formally adopted into the Comprehensive Plan, are acknowledged by the City and play a role in guiding development and informing policy.

Browne's Addition

Browne's Addition is located in South Spokane, north of I-90 and West Sunset Boulevard, east of Latah Creek, and south of Spokane River and Peaceful Valley Neighborhood. It is one of the city's earliest neighborhoods and is designated as a historic district nationally and locally. The Browne's Addition Neighborhood Association developed a master park plan for Coeur d'Alene Park, a nearly 10-acre park in the heart of the neighborhood (Friends of Coeur d'Alene & Browne's Addition Neighborhood Association, 2015). The Spokane Park Board adopted the master park plan in September 2015 (City of Spokane Parks and Recreation, 2015).

Grandview / Thorpe

Located in Southwest Spokane west of Highway 195 and south of I-90, Grandview / Thorpe is a low intensity residential community with strong connections to natural areas and recreational amenities. It is also the location of a former interurban rail line. Adopted by its neighborhood council in 2015, the Grandview / Thorpe Neighborhood Action Plan envisions creating a more connected, walkable, and community-focused Grandview/Thorpe area in Southwest Spokane, blending natural character with neighborhood identity (Grandview/Thorpe Neighborhood Council, 2015). It prioritizes establishing a neighborhood activity center or small-scale retail node, improving trail connectivity through partnerships and easements, and creating gateway features at key intersections like Grandview & 17th and Thorpe Road. The plan also highlights road improvements to enhance walkability and access throughout the neighborhood.

Land use priorities include exploring modifications to the comprehensive plan and zoning to enable neighborhood-serving retail—an option currently not permitted under existing regulations. On the transportation front, emphasis is placed on improving trail access and walking infrastructure, while strategically positioned neighborhood gateways serve both functional and identity-strengthening roles.

The City Council adopted the plan by resolution in November 2015 (City of Spokane, 2015).

Peaceful Valley

The Peaceful Valley Neighborhood is on the south bank of the Spokane River, immediately west of Downtown Spokane and north of Browne's Addition neighborhood. Adopted by resolution by the City Council in 2015 (City of Spokane, 2015), the Peaceful Valley Neighborhood Plan focuses on vibrancy, walkability, and a connected community (Peaceful Valley Neighborhood Council, 2015). Key priorities include improve traffic and pedestrian safety along Clarke and Main avenues, improve crime

awareness, and build trust among neighbors. There are also environmental protections, a desire to improve access to parks and recreation, and a desire to preserve the housing quality and historic character of the neighborhood.

South Hill Coalition

Connectivity and Livability Strategic Plan

The South Hill Coalition (SHC), comprising five neighborhoods—Cliff Cannon, Comstock, Lincoln Heights, Manito/Cannon Hill, and Rockwood—collaborated to develop a unified vision for the South Hill area. Adopted as a resolution in 2014 by City Council, the 20-year Connectivity and Livability Strategic Plan is a visionary document to guide improvement in the neighborhood that emphasizes enhancing connectivity, livability, and neighborhood identity (South Hill Coalition, 2014). The plan identifies priority projects aimed at improving infrastructure, promoting sustainable development, and fostering community engagement. These initiatives are designed to create a more cohesive and vibrant South Hill, aligning with the broader goals of the City of Spokane.

The plan's vision focuses on creating a well-connected, livable, and sustainable community that respects the unique character of each neighborhood. Key priorities include enhancing transportation options, improving public spaces, and promoting responsible land use. The plan also emphasizes the importance of community involvement and collaboration in achieving these goals. By addressing these priorities, the SHC aims to ensure that South Hill remains a desirable place to live and work for years to come.

Grand Boulevard Transportation and Land Use Study

To support planning efforts in South Hill, the City conducted the Grand Boulevard Transportation and Land Use Study (City of Spokane, 2020), adopted by resolution in August 2020 (City of Spokane, 2020). It studied the Grand Boulevard segment and set a long-range vision and implementation plan for safety, access, and mobility improvements. Study elements included reviewing traffic patterns and safety on Grand Boulevard; developing an understanding of bicycle and pedestrian needs; evaluating concepts of land reduction, bike lanes, wider sidewalks, and green infrastructure; conducting market analysis for redevelopment potential; studying land use designations and patterns of use; and collecting multimodal traffic data.

Future Neighborhood Planning Projects

Future neighborhood planning projects include Latah/Hangman Neighborhood Action Plan.

The City is also addressing a Strategy for Growth in Latah Valley and exploring needed local transportation improvements and other capital facility improvements. Another effort led by SRTC, together with WSDOT, the City, County, and Spokane Transit Authority, includes the US 195 North/I-90 Transportation Study that produced a study in 2021. The purpose was to develop a long-range transportation strategy for the Latah Valley, Grandview, and Thorpe areas of Spokane and Spokane County.

West Plains

In 2014, the City of Spokane studied subarea planning efforts in the West Plains and issued a Draft West Plains Transportation Subarea Plan. West Plains also has a WSDOT-led "living study" for the West Plains subarea. However, these documents have not been formally adopted.

West Plains Draft Transportation Subarea Plan (2014)

In 2014, the City of Spokane coordinated study efforts with partnering jurisdiction and agencies to study adequate transportation facilities and facilitate anticipated and desired development in the West Plains area (City of Spokane, 2014). Outcomes and recommendations from the Draft Subarea Plan include:

- Increase the overall transportation network density in the West Plains.
- Reserve right-of-way for arterials identified in the updated arterial plan.
- Accommodate and balance multiple modes of transportation.
- Design and improve US 2 to be an attractive entry; encourage new development to promote a distinct character.
- Develop safe and comfortable bike and pedestrian connections between Downtown Spokane and Fairchild Air Force Base and Downtown Spokane and the Spokane International Airport.
- Coordinate, prioritize, and invest in transportation system improvements.
- Anticipate the eventual extension of rights-of-way into urban reserve areas.

These findings were incorporated into the WSDOT West Plains Subarea Transportation Management Plan "living study."

West Plains Transportation Subarea Plan (Ongoing)

Led by WSDOT, the West Plains Subarea Transportation Management Plan is a "living study" that focuses on land use and multimodal transportation solutions in the West Plains Area of the Spokane region (WSDOT - Eastern Region Planning, 2022). As a living study, WSDOT is continuing to update the project webpage (www.connectwestplains.com) with new data as it becomes available. The study area is in and around the US 2 corridor west of I-90 between the Fairchild Air Force Base entrance at Mitchell Street to the west to just east of Russell Road, and it encompasses part of the City of Spokane, as well as the City of Airway Heights and areas of Spokane County, the Fairchild Air Force Base, the Spokane International Airport, and lands of the Kalispell and Spokane Tribes. With land use development in the West Plains vicinity outpacing the available multimodal transportation system in the area, which has been found to be one of the fastest growing areas in Washington State, the study works to identify potential practice solutions.

Goals, strategies, and early actions in the plan focus on safety, mobility, quality of life, and economic vitality. Regarding land use, strategies are focused on promoting "a more balanced mix of land uses to facilitate shorter trips, use of transit and active transportation, and efficient use of the transportation

system" (WSDOT, 2025). Relevant land use strategies prioritize balancing employment growth with housing development.

3.6.2 Impacts

This section reviews the proposed alternatives for consistency with the adopted plans and policies discussed above. Impacts would arise if the alternatives impeded state or regional policies. More specifically, an impact is identified if the alternatives:

- Conflicts with the Washington State Growth Management Act or Spokane County Countywide Planning Policies.
- Are inconsistent with adopted state, regional, county, or local plans and policies.

Impacts Common to All Alternatives

Growth Management Act

Spokane adopted its Comprehensive Plan to comply with the GMA in 2001, with periodic amendments since then. The plan contains the elements required by the GMA, and the City has adopted land use and environment regulations (Title 23 and Title 25 in the SMC) that implement the plan.

The action alternatives would each adopt a new growth strategy, and each element of the Comprehensive Plan would be updated. The plan would continue to focus growth in an urban area with a range of public services and multimodal transportation options, provide for public services like parks and schools, and protect critical areas and environments consistent with the GMA.

The Draft EIS alternatives each accommodate the 2046 growth targets and examine different ways the City could distribute its 2046 forecast growth with varying degrees of concentration. Focusing growth within urban areas in this manner is consistent with GMA policies that seek to prevent sprawl and preserve rural areas and resource lands. All alternatives have sufficient zoned vacant and redevelopable land to accommodate the 20-year population, housing, and job allocations. However, Alternative 1 does not have sufficient land capacity to accommodate housing at all income levels, particularly 0-80% AMI. See **Exhibit 3.6-5**.

Exhibit 3.6-5 Growth Management Act Goals - Alternative Evaluations

GMA Goal	Discussion
(1) Urban Growth	Each studied alternative would serve growth with city or municipal services.
(2) Reduce Sprawl	Each studied alternative would focus on redevelopment in an urban environment.

GMA Goal	Discussion
(3) Transportation	Each studied alternative would place most growth in Downtown and along transit corridors. Alternatives 2 and 3 provide new multimodal level of service and improve accessibility for multiple modes of travel. Alternative 2 would intensify mixed-uses along transit in Downtown, Division Street, other frequent transit routes, and along corridors. Alternative 3 identifies key transportation connections between Center City, West Hills, and the North Spokane Corridor in the Hillyard area, and it includes the planned growth in the 5th Avenue Corridor on the southern end of the corridor.
(4) Housing	All alternatives accommodate housing growth targets. However, Alternative 1 does not provide sufficient capacity for housing at all income levels, particularly 0-80% AMI. Alternatives 2 and 3 provide for a greater range of housing in addition to middle housing. See also **Section 3.5 Population, Employment, and Housing** for a discussion of how the alternatives impact housing and address new GMA housing requirements in HB 1220.
(5) Economic Development	All alternatives accommodate job targets. Alternative 1 focuses job growth in health/services (Downtown) and industrial (along railroads and near the Spokane International Airport). Alternative 2 supports existing job centers and establishes a job allocation above the 20-year trend linked to jobs/housing balance. Alternative 3 establishes the highest jobs allocation with focused investment in areas with planned transportation investment.
(6) Property Rights	All alternatives support a reasonable use of property.
(7) Permits	All alternatives would implement City policies that promote fair permitting.
(8) Natural resource industries	There are mining resources in the city in the northeast corner, outside the Shiloh Hills neighborhood. Alternatives 2 and 3 are not anticipated to put housing in proximity, as much of the housing and job growth is concentrated in different locations of the city.
(9) Open space and recreation	All alternatives create demand for parks and recreation under adopted levels of service. The updated Comprehensive Plan could include an updated level of service standard. See **Section 3.8 Public Services**.
(10) Environment	All alternatives focus growth in the urban growth area, with impacts on the environment mitigated through compliance with federal, state, and local regulations. Alternatives 2 and 3 include development and implementation of climate resilience and greenhouse gas reduction goals and policies per HB 1181, as well as a review and update of critical areas regulations based on best available science.

GMA Goal	Discussion
	See **Sections 3.1 Earth, Water Quality, and Water Resources**, **3.2 Air Quality and Greenhouse Gas** , and **Section 3.3 Plants and Animals** for discussion of how the alternatives impact the natural environment.
(11) Citizen participation and coordination	Alternative 1 was based on a public engagement process in the last periodic review update. Relevant to the action alternatives, the public participation plan outlines how the City intends to engage community members in the plan update. See the summary **Chapter 2 Proposal and Alternatives**.
(12) Public facilities and services	All alternatives allow for growth that will increase demand for public services. The City and municipal providers regularly plan for capital facilities to meet current and projected needs. See **Sections 3.8 Public Services** and **3.9 Utilities** for detailed analysis.
(13) Historic preservation	Each alternative could result in redevelopment that has the potential to alter eligible historic resources or result in ground disturbing activities that could affect cultural resources. See the evaluation and mitigation measures on Cultural Resources in **Section 3.4 Land Use Patterns and Urban Form.**
(14) Climate change and resiliency	The action alternatives add climate planning, which include new climate resilience and greenhouse gas reduction goals and policies per HB 1181. Alternative 1 continues current natural environment policies and critical areas regulation, but these were not designed to meet the new HB 1181 requirements in full.
(15) Shorelines	The City maintains a shoreline master program under the Shoreline Management Act. It is updated periodically under a different timeline. The City must be consistent with the shoreline goals of environmental conservation, public access, and shoreline-oriented uses. All alternatives would continue to maintain the shoreline master program.

Multicounty Planning Policies and SRTC Regional Transportation Plan

Regional policies and alternatives' consistency are evaluated in **Exhibit 3.6-6**. Highlights are described below.

Countywide Planning Policies

Each alternative would provide capacity to meet minimum growth targets for housing and jobs. See **Exhibit 3.6-6**. The ability to produce housing at affordability levels is described in **Section 3.5 Population, Employment, and Housing**.

Exhibit 3.6-6. Countywide Planning Policies, Major Goals - Alternatives Evaluation

Topic Area	Relevant Overarching Policy	Evaluation
Land Use	**Policy Topic 1 Urban Growth Areas** Overarching summary: Growth in Spokane County will be encouraged in the UGAs, with lands in the UGAs developed with urban character and supported by urban services and facilities. Land outside UGA will remain rural or maintain its existing character, with jurisdictions working to protect natural resources lands, critical areas, and open spaces.	All alternatives would focus the majority of future growth in Downtown Spokane and in centers and corridors. Alternative 1 focuses growth in Downtown and in centers and corridors. Job growth is focused Downtown and in West Plains. Alternative 2 focuses growth along mixed-use TOD development along frequent transit corridors, with more neighborhood commercial zoning. Alternative 3 focuses growth Downtown and in Regional Hubs. Job growth is in Major Hubs, such as City Center, University District, and West Plains. See **Section 3.5 Population, Employment, and Housing** for further analysis on growth distribution in the city.
Public Services / Utilities	**Policy Topic 3. Provision of Urban Services** Overarching summary: Urban development will be distributed to promote land efficiency and in coordination with public facilities and utilities.	All alternatives would allow for growth that increases demand for public services. The City and municipal providers regularly plan for capital facilities to meet current and projected need. See Section **3.8 Public Services** and **Section 3.9 Utilities.**
Public Services	**Policy Topic 4 Parks and Open Space** Overarching summary: Jurisdictions in Spokane County will identify and protect open space lands, natural areas, and environmental corridors; develop and retain parks and open space; and recognize open space and recreation opportunities.	All alternatives would focus redevelopment in the UGA and in concentrated locations, increasing the opportunity to identify and protect open space and natural lands outside of these development areas. The City also regularly plans for parks and recreation to meet current and projected need. See **3.8 Public Services**.

Topic Area	Relevant Overarching Policy	Evaluation
Transportation	**Policy Topic 5 Transportation** Overarching summary: Jurisdictions in Spokane County will coordinate with regional transportation planning (SRTC and STA) to ensure transportation and land use compatibility, including the adoption of LOS standards, the designation of specific transportation corridors to support high-capacity transportation, and coordination and support of existing or new multimodal transportation systems.	Each alternative would place most growth around transit investments. The action alternatives provide for new multimodal LOS and improved accessibility for multiple travel modes. Alternative 2 intensifies mixed-uses and housing growth along corridors and frequent transit routes. Alternative 3 focuses growth in Center City, along corridors, and with connections to regional centers. See Section **3.7 Transportation** for a discussion on how the alternatives relate to transportation investment.
Housing	**Policy Topic 7. Affordable Housing** Overarching summary: Communities in Spokane County will accommodate a wide variety of development and housing types, with consistency in development regulations and standards within UGAs. It includes coordination of housing, transportation, and economic development strategies to ensure land and densities for affordable housing are in locations accessible to employment centers.	All alternatives meet total housing growth targets; however, only Alternative 2 and 3 have sufficient capacity to provide housing at all income levels, particularly 0-80% AMI. See **Section 3.5 Population, Employment, and Housing** for a discussion on how the alternatives impact housing.
Economy / Climate	**Policy Topic 8 Economic Development** Overarching summary: Regional economic development will include cooperation between the private sector and government, the need to maintain downtowns as retail and cultural hubs, and the need to adopt a regional approach to environmental issues (water and air quality).	All alternatives would accommodate greater jobs and would promote economic opportunity in the city and region. There are no regionally designated jobs targets. Alternative 3 has the highest job growth projections and Alternative 2 has the lowest job growth projections. Alternative 2 supports existing job centers but supports neighborhood commercial retail nodes.

Topic Area	Relevant Overarching Policy	Evaluation
		Alternative 3 focuses jobs in Center City, University District, and West Plains. See **Section 3.5 Population, Employment, and Housing** for further discussion on job growth and analysis. Regarding climate, Alternatives 2 and 3 include new climate policies focused on reducing emissions from buildings and transportation and making the city more capable of withstanding the impacts of climate change. These policies are not included in Alternative 1.

SRTC Metropolitan Transportation Plan

The SRTC Metropolitan Transportation Plan policies and consistency with the alternatives are evaluated in **Exhibit 3.6-7**. Highlights are described below.

Exhibit 3.6-7. SRTC Metropolitan Transportation Plan - Alternatives Evaluation

Topic Area	Relevant Overarching Policy	Evaluation
Economic Vitality	Promotes economic vitality and prioritizes transportation investment.	Alternative 1 concentrates housing growth throughout the city but with intense concentrations on the fringes of the city. It supports some existing transit routes investments in Northwest Spokane and in Center City. Alternative 2 intensifies growth in mixed-use areas along frequent transit routes and corridors, and includes planned TOD improvement areas, which helps concentrate transportation investment. Alternative 3 focuses investment in areas with transportation investments that help improve connections to hubs. However, it requires the greatest

Topic Area	Relevant Overarching Policy	Evaluation
		investment in transit and transportation. It also promotes mixed-use development and neighborhood commercial, which contributes to economic vitality, particularly in Center City and regional hubs.
Stewardship	Protects the environment and minimizes impacts from transportation	Alternative 1 has intense levels of growth in West Plains, Center City, and Northeast Spokane specifically the Hillyard and Chief Garry neighborhoods. Alternative 2 intensifies growth in mixed-use areas, which helps increase land use efficiency and reduce sprawl, which helps minimize impacts on the environment from transportation. Alternative 3 intensifies growth along key transportation connections between regional centers and promotes multimodal levels of service, minimizing the transportation impacts to the environment.
Quality of Life	Improves choice and mobility	Alternatives 2 and 3 provide for a new multimodal LOS and improve accessibility for multiple modes of transportation. See **Section 3.7 Transportation** for further discussion on transportation accessibility.

THRIVE Spokane – Comprehensive Economic Development Strategy Plan

The THRIVE Spokane Comprehensive Economic Development Strategy Plan goals and consistency with the alternatives are evaluated in **Exhibit 3.6-8**. Highlights are described below.

Exhibit 3.6-8 THRIVE Spokane – Alternatives Evaluation

Topic Area	Relevant Overarching Strategies and Actions	Evaluation
Recovery and Resilience	Targets efforts that prepare the region to avoid, withstand, and recover from economic shocks and natural disasters.	All alternatives would focus the majority of future growth in Downtown Spokane and in centers and corridors Alternative 1 concentrates housing growth in Downtown and in centers and corridors. It supports some existing transit routes investments in Northwest Spokane and in Center City. Alternative 2 focuses growth along mixed-use TOD development along frequent transit corridors, with planned TOD improvement areas. Alternative 3 focuses growth in Center City and in regional hubs. It also promotes mixed-use development and neighborhood commercial, which contributes to economic vitality and resiliency, particularly in Center City. See **Section 3.5 Population, Employment, and Housing** for further analysis on growth distribution in the city.
Competitiveness	Positions the region as a strong competitor to attract talent, capital, and resources for strategic economic development.	All alternatives would accommodate greater jobs and promote economic opportunity in the city and region. Alternative 1 has intense levels of growth in West Plains, Center City, and Northeast Spokane specifically the Hillyard and Chief Garry neighborhoods. Alternative 2 intensifies growth in mixed-use areas, which helps support investment in mixed-use projects and

Topic Area	Relevant Overarching Strategies and Actions	Evaluation
		connects workers with growth employment centers. Alternative 3 intensifies job growth in Center City, University District, and West Plains, supporting economic agglomeration to attract capital and resources. It also places capacity for housing growth for all income levels on key transportation corridors to support the connection of workers with employment centers.
Equitable Growth	Seeks to understand, address, and dismantle outcome disparity	All alternatives would support growth. Alternatives 2 and 3 support TOD development and increase mixed-use development.
Connectivity	Promotes the interconnectedness of Greater Spokane and drives cross-sector partnerships to align efforts that advance economic opportunity for all.	All alternatives have growth in well-connected opportunity areas of Spokane. Alternative 2 prioritizes TOD development and growth along corridors and frequent transit routes. Alternative 3 establishes the highest jobs allocation with focused investment in areas with planned transportation investments.

Area Specific Evaluation

Northwest Spokane

All alternatives have concentrated growth in Northwest Spokane, in the neighborhoods of North Indian Trail, Emerson / Garfield, Northwest, and North Hill. Overall, the alternatives support the key objectives of the neighborhood plans. See **Exhibit 3.6-9** for an evaluation of consistency of the alternatives with neighborhood planning efforts.

Exhibit 3.6-9. Alternatives Consistency with Northwest Spokane Neighborhood Plans

Neighborhood / Action Plan	Alternative 1	Alternative 2	Alternative 3
Emerson-Garfield	●	●	●+
Five Mile Prairie	●	●	●
North Hill	●	●+	●+
Northwest & Audubon / Shadle Area	●+	●	●+
West Central	●+	●	●

Legend: ○ = does not support or partially supports ●=supports ●+ = optimally supports

Neighborhood Planning Efforts

- **Emerson-Garfield:** Alternatives 2 and 3 promote higher housing growth in the Emerson-Garfield neighborhood, which supports its neighborhood action plan goals to have strong residential areas. However, Alternative 1 does have some growth, particularly closer to Center City. Alternatives 1 and 3 have more job growth in this neighborhood than Alternative 2, which supports the neighborhood action plan to build a vibrant business district.
- **Five Mile Prairie:** The neighborhood action plan focuses on transportation connectivity and improvements, and it identifies as a low-density residential neighborhood. Alternative 1 concentrates housing growth in the neighborhood, which may result in changes to the neighborhood action plan. Alternatives 2 and 3 focus less housing and job growth in this neighborhood.
- **North Hill:** Alternatives 2 and 3 anticipate more housing and job growth in the North Hill neighborhood than Alternative 1. This anticipated growth will help support the neighborhood's vision to create a vibrant, higher intensity area.
- **Northwest & Audubon / Downriver:** Alternatives 1 and 3 have concentrations of housing and job growth in the Shadle Area of this neighborhood, which support the Shadle Area Neighborhood Plan to encourage mixed-use growth and diverse housing options. Alternative 2 focuses job growth in the Shadle Area; however, much of its housing growth is anticipated along the northern border of the neighborhood.
- **West Central:** The neighborhood action plan promotes attracting commercial and light industrial investment while maintaining single unit residential. Alternative 1 forecasts lower housing growth concentrations in the neighborhood than Alternatives 2 and 3, so it may be more supportive of the neighborhood plan's overall goals. Regarding job growth, Alternatives 1 and 3 anticipate higher concentrations of job growth in the neighborhood than Alternative 2; however, all alternatives are anticipated to attract economic investment.

Northeast Spokane

All alternatives have concentrated growth in Northeast Spokane that varies by alternative. Overall, the alternatives support the key objectives of the neighborhood plans. See **Exhibit 3.6-10** for an evaluation of consistency of the alternatives with adopted plans and neighborhood planning efforts.

Exhibit 3.6-10. Alternatives Consistency with Northeast Spokane Neighborhood Plans

Neighborhood Plan	Alternative 1	Alternative 2	Alternative 3
Subarea and TOD Plans			
Hillyard Subarea Plan	●	●	●+
South Logan TOD Plan	○	●+	●+
Neighborhood Planning Efforts			
Bemiss, Hillyard, and Whitman	●	●	●
Chief Garry Park	●	●+	●+
East Central	●	●	●
Nevada-Lidgerwood	●	●	●

Legend: ○ = does not support or partially supports ●=supports ●+ = optimally supports

Hillyard Subarea Plan

All alternatives have concentrations of housing and job growth in the Hillyard neighborhood. Alternatives 2 and 3 have high concentrations of housing growth in the Hillyard Business District, which aligns with the Hillyard Subarea Plan's vision to build upon assets and promote mixed-use development in this district. Alternatives 1 and 3 also have concentrations of job growth throughout The Yard in the Hillyard Subarea, which aligns with the Subarea Plan's goal to evolve The Yard into a diverse employment center. All three alternatives have concentrated residential growth in the Beacon Hill area in the southeast corner of the Hillyard Subarea, which aligns with future redevelopment in this area.

South Logan TOD Plan and Logan Neighborhood Plan

Alternatives 2 and 3 have high concentrations of housing and job growth in the South Logan neighborhood. The concentration of growth supports the South Logan TOD Plan, adopted by resolution in 2023, which focuses on expanding housing options and affordability and drawing in business investment and residents. In comparison, Alternative 1 has some housing and job growth in the Logan neighborhood, but it is limited and does not reflect the South Logan TOD Plan since No Action was based on the Comprehensive Plan in place as of the 2022 base year. The action alternatives

also support TOD concepts developed in the Transit Oriented Development Framework Study, adopted by resolution, which emphasized transit-supportive, mixed-use growth at Bus Rapid Transit station areas in the Chief Garry Park neighborhood along Mission Avenue and near Spokane Community College.

Other Neighborhood Planning Efforts

- **Bemiss, Hillyard, and Whitman:** All three alternatives focus job growth in the Hillyard neighborhood and part of the Bemiss neighborhood. Alternatives 2 and 3 both focus housing growth along corridors in the Hillyard neighborhood; Alternative 1 focuses housing growth throughout these three neighborhoods, with housing concentrations on the east border of Hillyard. Alternatives 2 and 3 align housing and job growth with existing transportation connections to help enhance livability, a core goal of the neighborhood plan.
- **Chief Garry Park Neighborhood:** All three alternatives focus housing growth in the northwest corner of the neighborhood, which aligns with the neighborhood plan's focus areas for growth. Both Alternatives 2 and 3 encourage moderate increases in housing density throughout the area, which aligns with the neighborhood plan to help maintain affordability. Job growth in all three alternatives is focused on the southern half of the neighborhood.
- **East Central Neighborhood:** While the existing neighborhood plan focuses primarily on improvements to the Ben Burr Trailhead, overall neighborhood goals include connectivity. All alternatives add housing and job growth to East Central. Alternatives 2 and 3 add more housing growth than Alternative 1, which helps promote connectivity to Center City. All alternatives add concentrated job growth in the neighborhood.
- **Nevada Lidgerwood:** Neighborhood planning efforts focus on non-motorized travel safety and helping to reduce traffic volumes and speed. All alternatives focus job growth in the northwest corner of the neighborhood. Alternatives 2 and 3 focus housing growth along Division Street, while Alternative 1 has housing growth in less concentrated amounts throughout the neighborhood.

Division Corridor

Alternatives 2 and 3 focus mixed-use and commercial growth along the Division Corridor, as well as moderate and high residential density. This aligns with strategies and priorities recommended in the DivisionConnects Phase 1 and Phase 2 study, which includes development of transit-supportive strategies including supportive land uses along the corridor, such as mixed-use, commercial, and higher intensity residential. This also aligns with ongoing planning efforts in the Division Street TOD Plan, which models transit-supportive growth and mixed-use development at Rowan and Francis Bus Rapid Transit station areas and in the southern portion of the Division-Ruby couplet.

Alternative 1 primarily concentrates growth in the Division Corridor where it overlaps with the Center City study area (e.g., near University District, Medical District, and the Downtown Center).

Center City

All alternatives have concentrated job and housing growth in Center City, with Alternatives 2 and 3 promoting denser concentration of housing growth than Alternative 1. Overall, the alternatives support the adopted plans' key objectives. See **Exhibit 3.6-11** for an evaluation of consistency of the alternatives with adopted plans and neighborhood planning efforts.

Exhibit 3.6-11. Alternatives Consistency with Center City Spokane Neighborhood Plans

Neighborhood Plan	Alternative 1	Alternative 2	Alternative 3
Adopted Plans			
Spokane Downtown Plan	●	●+	●+
South University District Subarea Plan	●	●+	●+

Legend: ○ = does not support or partially supports ●=supports ●+ = optimally supports

Spokane Downtown Plan

All alternatives place housing and job growth in Downtown Spokane, which supports the overall vision of the Downtown Plan. Alternative 2, and particularly Alternative 3, focus higher concentrations of housing in the Center City and Downtown area than Alternative 1. Higher densities of housing in this area support the Plan's vision to promote higher density residential with a range of housing options and mixed-use development. Regarding job development, Alternative 3 places higher job growth in Center City, which supports the Downtown Plan vision to build upon its emerging activity centers and promote mixed-use development.

South University District Subarea Plan

Compared to Alternative 1, Alternatives 2 and 3 place higher concentrations of housing and job density in this area which supports the subarea plan's vision of a lively mixed-use urban village design of residential, retail, institutional, and artisan/light industrial uses. Alternative 3 in particular would provide more housing and jobs than other alternatives.

South Spokane

All alternatives have concentrated job and housing growth along corridors and nodes in South Spokane, and on vacant land in the Grandview and Latah neighborhoods. See **Exhibit 3.6-12** for an evaluation of consistency of the alternatives with neighborhood planning efforts.

Exhibit 3.6-12. Alternatives Consistency with South Spokane Neighborhood Plans

Neighborhood Plan	Alternative 1	Alternative 2	Alternative 3
Neighborhood Planning Efforts			
Grandview / Thorpe	●	●	●
Peaceful Valley	●	●	●
South Hills Coalition	●	●	●

Does not include Browne's Addition; that neighborhood plan is focused on a master park plan.
Legend: ○ = does not support or partially supports ● =supports ●+ = optimally supports

Neighborhood Planning Efforts

- **Grandview / Thorpe:** The neighborhood action plan prioritized establishing a neighborhood activity center or small-scale retail node. All alternatives anticipate a similar level of housing and job growth.
- **Peaceful Valley:** The neighborhood action plan focuses on community connectivity, walkability, and traffic safety. All alternatives place similar levels of growth and support these objectives.
- **South Hill Coalition:** The neighborhood coalition plan focuses on connectivity, enhancing livability, and fostering a cohesive and vibrant South Hill. The alternatives support these neighborhood objectives, with all alternatives placing housing growth in focused concentrations in Southgate, Lincoln Heights, and Rockwood neighborhoods. Alternative 3 also places higher concentrations of housing growth in Cliff Cannon than Alternatives 1 and 2. Job growth follows similar geographic concentrations across all alternatives, with job growth in Lincoln Heights, Southgate, and Cliff Cannon. Alternative 3 shows higher concentrations of job growth in South Hill neighborhoods closer to the Center City core in the medical district. All alternatives show similar levels of support for these plan objectives and are anticipated to contribute to livability and cohesiveness in the South Hill area.

West Plains

The West Plains Subarea Transportation Management Plan focuses on promoting a balanced mix of land uses to support efficient use of the transportation system. All alternatives promote similar concentrations of job growth in the West Plains neighborhood. Regarding housing growth, Alternative 1 has concentrations of housing growth in the West Plains neighborhood, near the Grandview / Thorpe and Latah neighborhoods. Alternatives 2 and 3 anticipate lower levels of concentrated growth in this area. The anticipated housing and job growth concentrations in West Plains support the overall goal to balance land uses in this neighborhood.

Comparison of Impacts

Environmental Justice Implications

Climate Resilience and Greenhouse Gas Reduction Policies

Alternatives 2 and 3 will add climate planning, which include new climate resilience and greenhouse gas reduction goals and policies per HB 1181. In comparison, Alternative 1 No Action continues current natural environment policies and critical areas regulation, but these were not designed to meet the new HB 1181 requirements in full.

Without these climate resilience goals and policies, Alternative 1 may increase vulnerability for overburdened communities in the city. These community members often have fewer resources and may face greater harm should they be impacted by extreme weather (e.g., extreme heat, wildfire smoke). Alternative 1 may also place disproportional health impacts on vulnerable populations (e.g., children, seniors, and people with preexisting health conditions) affected by increased exposure to air pollution, heat, and other climate-related hazards. Furthermore, it may deepen disparities among community members with adaptive capacity and more vulnerable community members without these resources.

Alternatives 2 and 3 add climate planning, which increases goals and policies in climate resilience and greenhouse gas emission reduction. Possible effects include prioritizing improvements to vulnerable communities to increase resilience (e.g., tree planting, cooling centers), equity integrated in climate planning to increase recovery capacity should an extreme weather event occur, and targeted greenhouse gas emission strategies to help improve local air quality in communities located near traffic or industrial use.

Alternative 1: No Action, Stay the Course

Alternative 1 No Action would meet GMA goals regarding urban growth served by transportation and urban services. It would not meet new GMA requirements to amend the Housing Element to address new requirements in HB1220 regarding housing opportunities by income band. While it has enough land capacity to accommodate housing and job growth targets, it does not have enough capacity to accommodate housing targets at all income levels, specifically housing for those with incomes at 0-80% of AMI. Alternative 1 No Action also does not meet HB 1181 requirements to include new climate resilience and greenhouse gas reduction goals and policies.

Regarding regional planning policies, Alternative 1 meets CPPs related to focusing growth in the urban area that is coordinated with urban services. It also generally supports regional coordination efforts related to transportation and economic development. While the City has existing multimodal transportation level of service standards, Alternative 1 does not update its multimodal transportation level of service to adopt VMT and GHG reduction goals for transportation. Alternative 1 also does not meet capacity for affordability housing targets and does not include climate policies that could help

address environmental issues related to air quality. Alternative 1 is also generally supportive of policies in the SRTC Horizon 2045 Metropolitan Transportation Plan and THRIVE Spokane.

Regarding local planning efforts, Alternative 1 is generally supportive of local neighborhood plans' objectives but assumes a growth strategy before the completion of the South Logan TOD Plan and the DivisionConnects corridor strategy. See **Impacts Common to All Alternatives** for more details.

Alternative 2: Distributed and Balanced

Alternative 2 would be consistent with state and regional goals. Similar to Alternative 1, it would meet GMA goals regarding urban growth served by transportation and urban services. Unlike Alternative 1, it would meet new GMA requirements to update the Housing Element in the Comprehensive Plan to address new requirements in HB1220 regarding housing opportunities by income band. It has enough capacity to accommodate housing targets at all income levels. Alternative 2 includes climate planning, with goals and policies that are consistent with HB 1181. It would also update the critical areas regulations.

Regarding regional planning policies, Alternative 2 meets CPPs, including focused growth in the urban area and the provision of urban services. It concentrates growth along frequent transit routes and corridors to support regional transportation planning investments. It also provides for an updated multimodal LOS that adopts VMT and GHG reduction goals. In addition, it supports improved mobility and accessibility efforts for multiple travel modes due to its concentration of housing and job growth. Similarly, Alternative 2 is supportive of regional transportation planning policies and THRIVE Spokane, due to its concentration of growth along frequent transit routes and corridors. The jobs/housing balance in concentrated areas of the city that aligns with transportation investment helps support mixed-use and TOD improvements, and aligns with regional economic goals around recovery, resiliency, equitable growth, and connectivity.

Regarding local planning efforts, Alternative 2 supports or optimally supports local neighborhood plans. See **Impacts Common to All Alternatives** for more details. Below is an evaluation of how Alternative 2 supports adopted projects and subarea plans incorporated in the City's Comprehensive Plan and/or municipal code.

Northeast Spokane

Alternative 2 concentrates housing and job growth in the Logan neighborhood, which supports the goals and objectives in the South Logan TOD Project and Plan. It aligns with land use and zoning changes to support a mixed-use corridor along Hamilton Street and aligns with TOD investments in this neighborhood. It also has concentrations of housing growth and promotes mixed-use development in the Hillyard neighborhood, aligning with the Hillyard Subarea Plan's vision.

Division Corridor

Alternative 2 adds greater housing and job intensity along frequent transit routes, with mixed-use, commercial, and higher density residential along Division Street. This aligns with the DivisionConnects

Phase 2 study and Division Street TOD Plan, which models transit-supportive growth and mixed-use development at Rowan and Francis Bus Rapid Transit station areas and in the southern portion of the Division-Ruby couplet.

Center City

Alternative 2 focuses high concentrations of housing and job growth in the Center City, including Downtown and the South University District. These higher concentrations of growth align with the Spokane Downtown Plan to promote higher density residential growth and mixed-use development and with the South University District Subarea Plan to have higher concentrations of housing and job growth to support a lively mixed-use urban village.

Alternative 3: Center City and Regional Hubs

Impacts under Alternative 3 are similar to those described under Alternative 2. The alternative concentrates jobs and housing growth in regional hubs with connections to the Center City and North Spokane corridor in the Hillyard area and includes the planned growth in the 5th Avenue Corridor on the southern end of the corridor. Alternative 3 has the highest jobs allocation, with focused investment in key employment centers, which supports locally adopted projects and subarea plans, including the Spokane Downtown Plan, the South University District Subarea Plan, the South Logan TOD Plan, and the Hillyard Subarea Plan These Plans support increased business and commercial investment, the promotion of mixed-use development, and lively centers, which will be supported through the concentrated residential and job growth in Alternative 3.

3.6.3 Mitigation Measures

Incorporated Plan Features

Features of the alternatives that help increase policy and plan consistency include:

- Alternatives 2 and 3 meet housing targets at all income levels to address state housing requirements in HB 1220.
- Alternatives 2 and 3 include climate planning goals and policies in the Comprehensive Plan to implement state requirements of HB 1181 to have a Climate Element.

Regulations and Commitments

As required by GMA, the City must submit proposed Comprehensive Plan amendments and updated regulations for review and comment by the State prior to final adoption.

Other Potential Mitigation Measures

When a Preferred Alternative is developed, it should be evaluated for conformity to state and regional plans and policies. This may include reallocating growth assumptions in certain areas while still being in the range of the studied alternatives.

3.6.4 Significant Unavoidable Adverse Impacts

No anticipated unavoidable adverse impacts are anticipated with respect to plans and policies. Inconsistencies with new regional plans and state requirements under the No Action Alternative would be avoided through amendments to the Comprehensive Plan proposed under the action alternatives.

3.7 Transportation

This section describes citywide existing transportation conditions in the City of Spokane, establishing a baseline for evaluating potential future performance of the growth alternatives presented in Chapter 2 of the Draft Environmental Impact Statement (DEIS). This section provides an inventory of existing pedestrian, bicycle, transit, vehicle, and freight networks, documents overall safety conditions, and assesses mobility, access, and equity across the city.

The transportation existing conditions baseline reflects available data and adopted plans, including Spokane's Pedestrian and Bicycle Master Plans, and supports analysis of how each alternative could affect travel behavior, infrastructure performance, and user experience. This chapter also identifies key metrics and evaluation criteria used to assess impacts and potential mitigation measures, consistent with the overarching goals of PlanSpokane 2046.

Study Area

The City of Spokane is Washington State's second largest city and covers an area of approximately 69 square miles. The primary transportation study area is within the City's limits; connections to neighboring jurisdictions are also considered to reflect regional travel patterns. For a citywide description of the EIS alternatives and study area, see Chapter 2 (Proposal and Alternatives). A map of the City's limits, urban growth areas, and neighborhoods is available in **Section 2.1.3 Study Area**.

Data and Methods

This analysis evaluates the potential transportation impacts of the Spokane Comprehensive Plan growth alternatives using a combination of citywide datasets, regional planning tools, and multimodal performance measures.

The transportation analysis provides a citywide, programmatic assessment of how growth alternatives would affect travel behavior, congestion, and multimodal network performance. Rather than evaluating individual projects, the methods are designed to compare how overall land use affect system-level travel and access to mobility options.

A set of qualitative and quantitative metrics is utilized to compare how each alternative affects conditions for people walking, bicycling, taking transit, and driving. Results are summarized at both the citywide and subarea levels to capture variations in land use and travel patterns.

For the Vehicle Network and State Facilities, quantitative metrics are used to measure performance. These metrics are defined below.

Intersection Level of Service (LOS)

Intersection LOS is a qualitative measure used to evaluate traffic operations and delay at signalized and unsignalized intersections. It is defined in the Highway Capacity Manual (HCM) and widely used by transportation agencies across the U.S., including WSDOT and the Spokane Regional Transportation

Council (SRTC). LOS is expressed as a letter grade from A to F, representing the average delay experienced by vehicles during peak conditions.

LOS Letter Grades:

- **LOS A**: Free flow: Little to no delay (≤10 seconds); high comfort and freedom of movement.
- **LOS B**: Stable flow: Slight delay (10–20 seconds); minor restriction to maneuverability.
- **LOS C**: Stable flow with more delay: Moderate delay (20–35 seconds); acceptable performance in urban areas.
- **LOS D**: Approaching unstable flow: Noticeable delays (35–55 seconds); common threshold for acceptable performance in cities like Spokane.
- **LOS E**: Unstable flow with significant delays: High delay (55–80 seconds); nearing capacity with poor progression.
- **LOS F**: Forced or breakdown flow: Very high delay (>80 seconds); over-saturated conditions, often resulting in queuing and driver frustration.

Volume-to-Capacity Ratio (v/c) Summary

The volume-to-capacity ratio (v/c) is a performance metric used to assess how efficiently a roadway or intersection is operating. It compares the actual traffic volume using a facility to its maximum carrying capacity:

v/c = traffic volume ÷ roadway capacity

A v/c ratio < 1.0 indicates that demand is within the available capacity.

A v/c ratio = 1.0 suggests the facility is operating at capacity.

A v/c ratio > 1.0 means demand exceeds capacity, often resulting in congestion, delays, and queuing.

Transportation agencies like WSDOT and SRTC use v/c ratios to evaluate system performance, identify deficiencies, and prioritize improvements in corridor planning and environmental review.

VMT per Capita and Mode Share

Vehicle-Miles-Traveled (VMT) per capita and mode share are travel-behavior indicators used to compare growth alternatives at a citywide, programmatic scale. VMT Per-capita measures driving by population, and mode share shows how trips are distributed across drive alone (SOV), shared ride (HOV), transit, walk, and bike. These metrics are planning-scale indicators intended for relative comparison among land use patterns.

Results are derived from the SRTC regional travel demand model for the study years (2024 existing and 2046), with model post-processing consistent across all alternatives. Future funded projects and service assumptions, such as the North Spokane Corridor and Division Street BRT, are constant across alternatives for comparability.

3.7.1 Affected Environment

This section describes the existing transportation network within the City of Spokane. The transportation network consists of pedestrian, bicycle, transit, and City and state-owned roadway facilities, serving general purpose and freight traffic.

Pedestrian Network

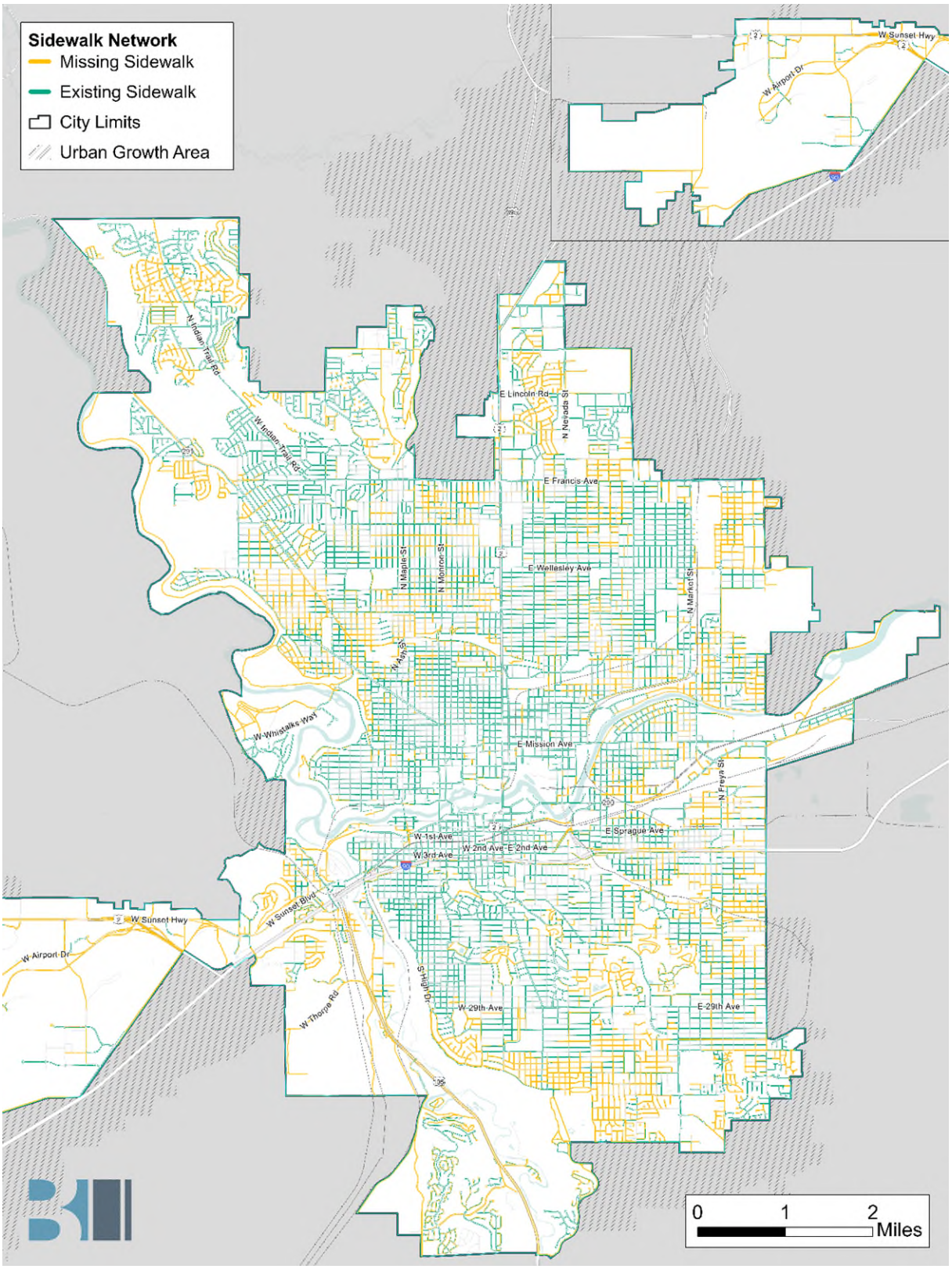
The City's pedestrian network consists of sidewalks, crosswalks, shared-use paths, neighborhood streets, and trails. The existing sidewalk network is mapped in **Exhibit 3.7-1**. Most major arterials have sidewalks on one or both sides of the road. However, there are considerable gaps in the sidewalk network in the West Plains and Northwest Spokane area and generally in the outer area of the City. Overall, north-south connectivity is also limited by the barriers of I-90 and SR 290 which have limited crossings and fewer adjacent sidewalks.

With the introduction of the 2015 Pedestrian Master Plan, the City of Spokane has worked to address gaps in the pedestrian network as a core element of its multi-modal transportation system alongside the implementation of its Complete Streets ordinance. These plans, in addition to the City's maintenance programs, ensure that the pedestrian network can be continually upgraded and maintained.

In addition, the 2015 Pedestrian Master Plan[11] established City Pedestrian Priority Zones, which are designated areas where the City will aim to invest in pedestrian infrastructure. These zones were chosen through an analysis of pedestrian demand and deficiencies and aim to enhance safety and walkability, particularly around schools, parks, and transit stops. These zones are spread throughout the city, and are periodically evaluated based on growth and pedestrian activity.

[11] City of Spokane, https://my.spokanecity.org/projects/pedestrian-master-plan/, 2015

Exhibit 3.7-1.Spokane Existing Pedestrian Facilities



Sources: City of Spokane, Fehr & Peers, 2025

Northwest Spokane

Sidewalk completeness generally improves closer to the City's core and activity nodes, while peripheral areas like Indian Trail and Five Mile Prairie have more gaps. Sidewalk infill continues on along the key diagonal connection of Driscoll Boulevard. Within Pedestrian Priority Zones, the City's plan highlights locations such as the Monroe Street Corridor, Cannon & Maxwell Center, and Shadel Center (Ash Street/Wellesley Avenue) for pedestrian access and safety improvements tied to centers and corridors.

Northeast Spokane

Northeast Spokane includes a mix of neighborhoods with uneven sidewalk coverage and more frequent gaps on the outskirts and along some local streets. Priority locations emphasize access along in centers and corridors such as the Five Mile Center (Division Street/Francis Avenue), the Hamilton Corridor, and the Market Street Corridor adjacent to the North Spokane Corridor. In the Hillyard neighborhood, sidewalks are less frequent on corridors, such as Wellesley Avenue and Freya Street, in the industrial and commercial areas east of the North Spokane Corridor (NSC).

Center City

Center City has the highest concentration of existing sidewalks in Spokane, with few missing segments. However, north-south pedestrian connectivity is occasionally constrained by geographic barriers such as the Spokane River and the BNSF railway. Key connectors that help bridge these obstacles include the Post Street Bridge in Downtown Spokane and the University District Gateway Bridge over the BNSF tracks. Most of the City's pedestrian priority zones are located within this subarea, reflecting its high pedestrian demand and infrastructure focus.

South Hill / South Spokane

In this subarea, sidewalk gaps are prevalent on the periphery of the city, which is largely related to the age of the neighborhood. The Pedestrian Master Plan identified several pedestrian priority zones adjacent to US 2, I-90, and in the Lincoln Heights neighborhood. These areas are prioritized for improvements to enhance walkability and safety.

West Plains

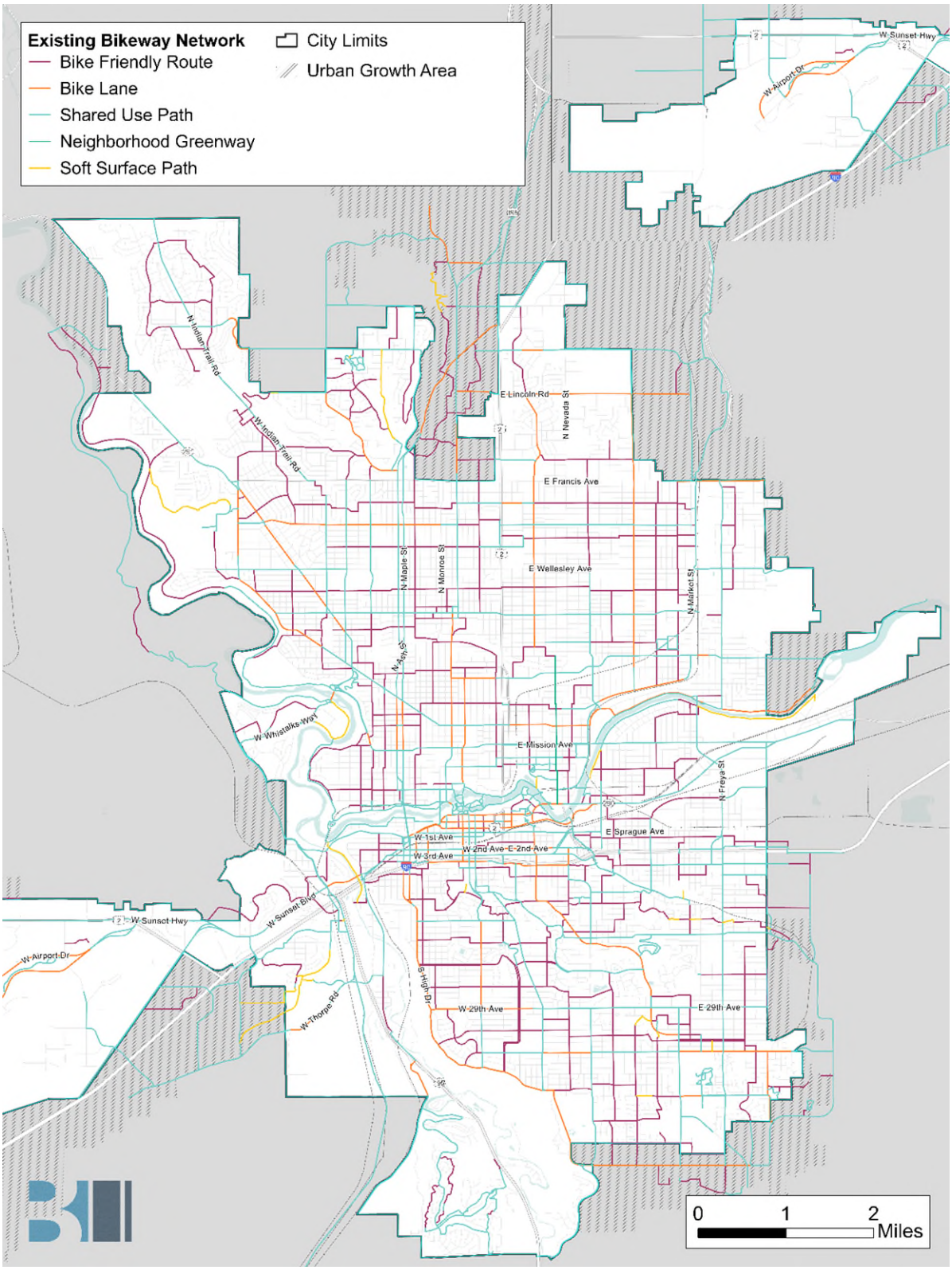
The West Plains subarea is predominantly industrial and lacks a comprehensive sidewalk network. Pedestrian access is constrained by proximity to major infrastructure such as the airport, US 2, I-90, and large industrial buildings. Notably, this is the only subarea in Spokane without any designated pedestrian priority zones under the Pedestrian Master Plan.

Bicycle Network

The bicycle network includes several facility types as designated in the City's 2017 Bicycle Master Plan. These bikeway types include Bike Lanes, Bike Friendly Routes, Neighborhood Greenways, Shared Use Paths, and Soft Surface Paths. In addition, the Bicycle Master Plan establishes a desired 2037 bicycle network, which would extend Spokane's bicycle network to roughly 400 miles.

Exhibit 3.7-2 shows the existing bicycle network in Spokane. The City's network primarily consists of bike friendly routes, bike lanes, and shared-use paths. Neighborhood greenways have been implemented along Cincinnati Street and are in progress in several other locations. There are also several soft-surface paths, mainly along the Spokane River and on the outskirts of the city.

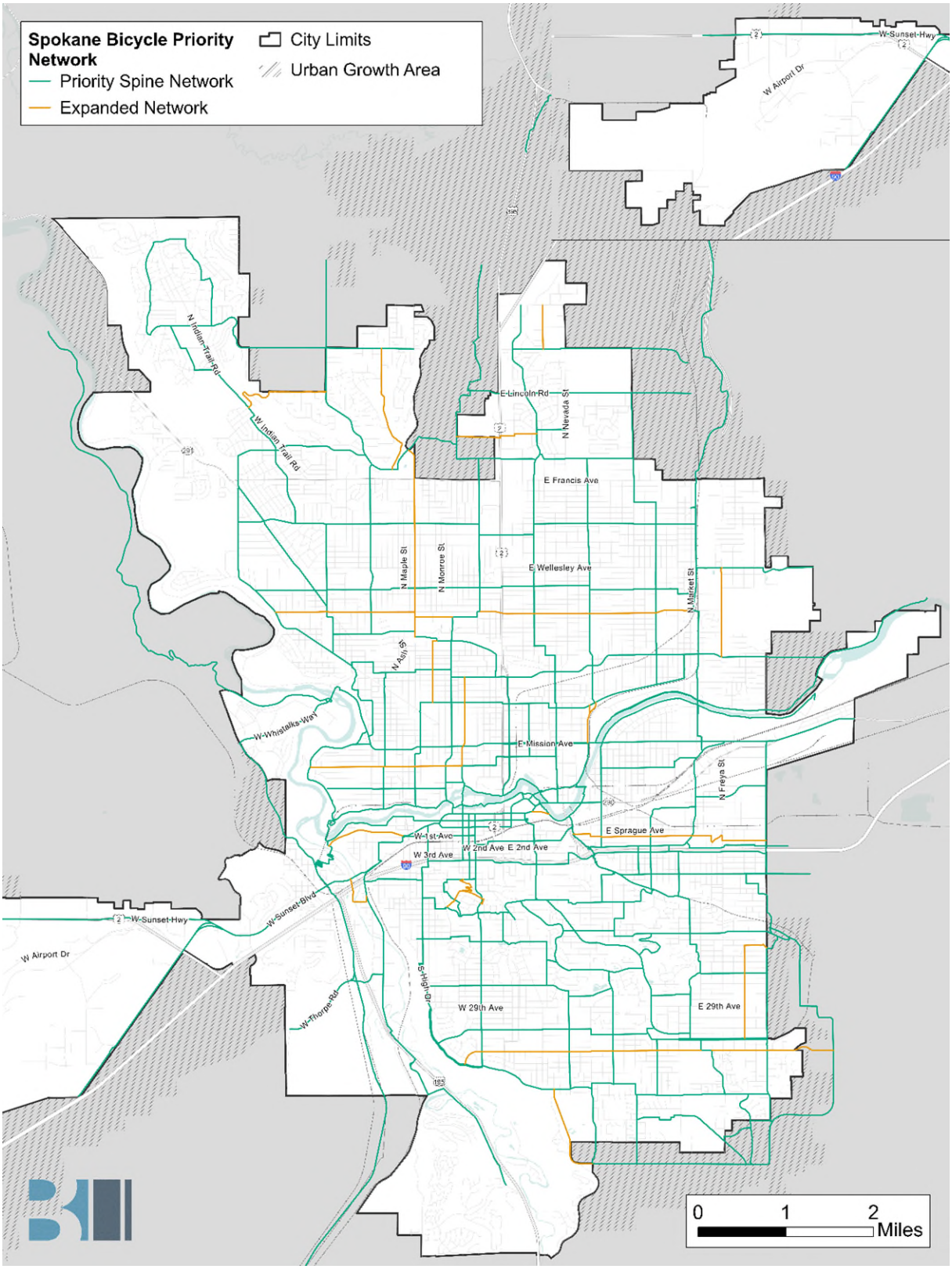
Exhibit 3.7-2. Spokane Existing Bicycle Network Facilities



Sources: City of Spokane, Fehr & Peers, 2025

The City's Bicycle Priority Network (**Exhibit 3.7-3**) identifies a fully connected, all-ages-and-abilities set of priority bikeways that link neighborhoods to schools, parks, transit, jobs, and activity centers. The Bicycle Priority Network was assembled with the input of community stakeholders to compose a network composed of a primary spine plus an Expanded Priority Network of important connections. The Bicycle Priority Network targets low-stress riding and aims for practical spacing of about 1/2 mile between parallel routes in most of the city and no more than 1 mile in less-dense areas. The Bicycle Priority Network is a planning network used to inform future bikeway implementation; not all priority routes have facilities today.

Exhibit 3.7-3. Spokane Bicycle Priority Map



Sources: City of Spokane, Fehr & Peers, 2025

Northwest Spokane

Northwest Spokane's bicycle network features the Spokane River Centennial Trail, which is a recreational and commuter spine linking neighborhoods to the Center City and Spokane Falls Community College. Recent projects are closing gaps, for example, the Maxwell Avenue (Pettet–Walnut) Bike/Pedestrian Safety Upgrades, completed in October 2025, added buffered bike lanes that connect the Centennial Trail to Maxwell at Walnut. The City's Bicycle Priority Network highlights lower-stress corridors parallel to the high-traffic Ash/Maple Street north–south couplet, with intersecting bike-friendly routes completing east–west connections between the river and the Division Street corridor.

Northeast Spokane

Northeast Spokane's bicycle network features the Children of the Sun Trail, which is a shared-use path along the North Spokane Corridor that links the county area of Wandermere south toward Spokane Community College and the Centennial Trail. The City's Bicycle Priority Network focuses on linking neighborhoods to this north-south connector and to major activity corridors. Emphasis is on creating lower-stress east–west alternatives to Wellesley Avenue to link the Market and Haven Street corridor with the Division Street Corridor and improve access to schools, parks, and transit.

Center City

The Center City's bicycle network is primarily composed of shared use paths, with additional bike-friendly routes located throughout the area. Despite this multimodal presence, some of Spokane's highest-stress bicycle facilities are located in Center City, contrasting with its well-developed pedestrian network. One notable low-stress facility is the bike-friendly route along Pacific Avenue, which is classified as LTS 1, and the Centennial Trail which provides a continuous shared-use facility extending east-west through downtown. Both routes provide more comfortable connection for cyclists in the downtown core.

South Hill / South Spokane

This subarea features a range of bicycle facilities, including bike-friendly routes, shared use paths, and bike lanes. In some locations, neighborhood greenways and soft surface paths supplement the network. The Ben Burr Trail provides a connection linking East Central and Lincoln Heights to the Centennial Trail and University District. The Fish Lake Trail serves Latah Valley and Grandview-Thorpe, and the City's Fish Lake–to–Centennial Trail Connection project will extend the trail north to the Centennial Trail and improve access from these neighborhoods toward Center City. However, compared to other subareas, South Hill and South Spokane generally have fewer low-stress bicycle routes, limiting accessibility for less confident riders.

West Plains

The West Plains subarea has minimal bicycle infrastructure, with the limited network primarily composed of shared use paths, soft surface paths, and a bike-friendly route. Historically, many segments are high-stress for everyday cycling. Sunset Boulevard provides a key connection between the West Plains, Spokane International Airport, and the broader Spokane network, and the City's Sunset Highway Trail – Spotted Road to Royal Street project. This project will provide a 10 to 12-foot dedicated multi-use path on the north side of Sunset, improving safety and connectivity for people biking and walking along the corridor.

Transit Network

Transit in Spokane is governed primarily by Spokane Transit Authority (STA). STA has established several transit plans to guide the development of the transportation network, such as STA Connect 2035, the Zero-emission Transition Plan, STA Moving Forward, as well as major ongoing projects such as Division Street Bus Rapid Transit and the I-90/Valley High Performance Transit (HPT) Project.

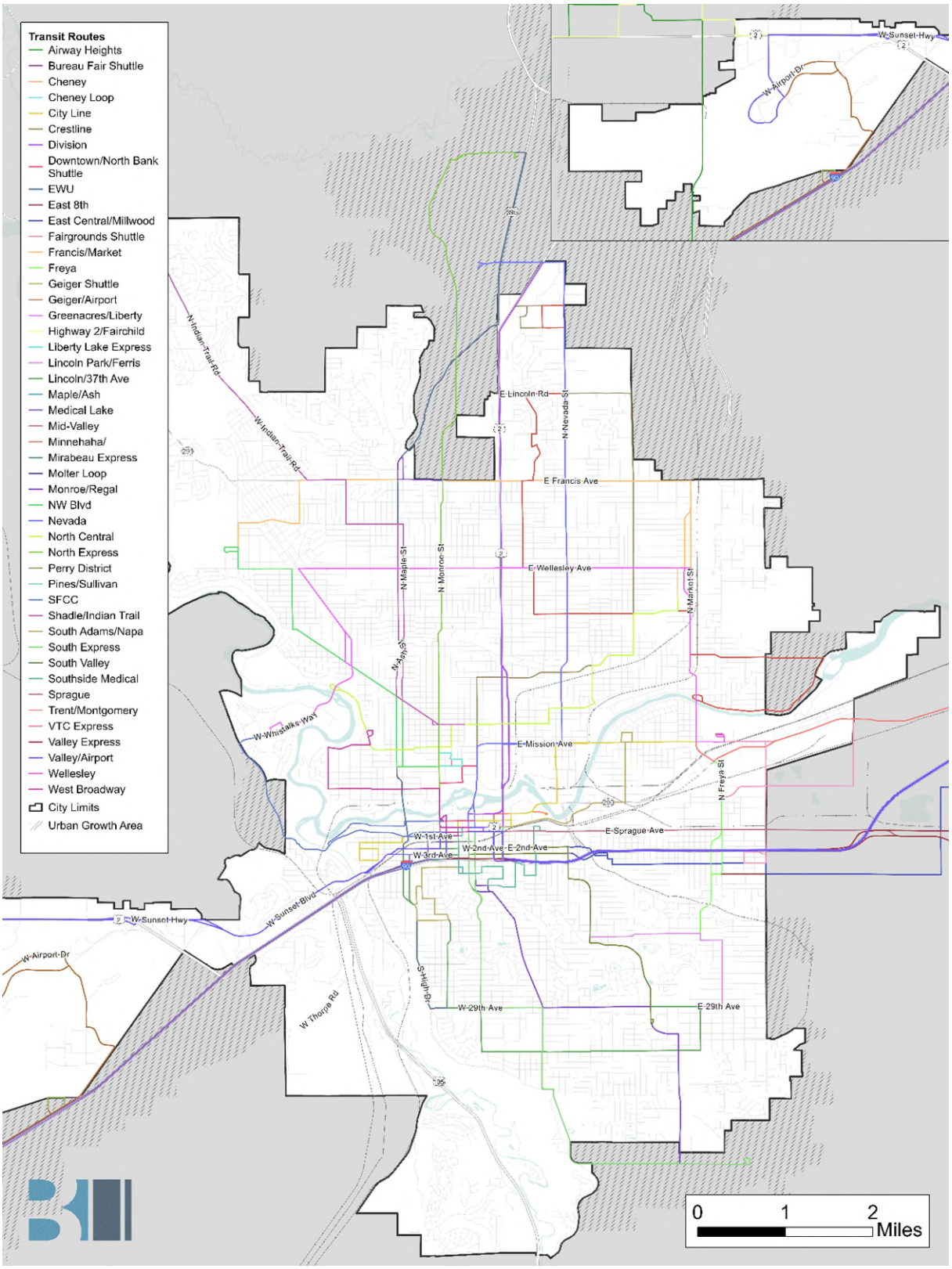
STA's fixed route transit network consists of frequent routes, regional routes, Bus Rapid Transit (BRT), and regular transit routes. **Exhibit 3.7-4** provides a summary of the existing STA routes. In addition, the City's existing transit network is shown in **Exhibit 3.7-5**. There are several transit routes throughout the Center City and options for east-west connectivity, especially due to transit offerings along I-90.

Exhibit 3.7-4. Summary of Existing Fixed Transit Types and Descriptions

Route Type	Route Type Description
Bus Rapid Transit (City Line - STA Route 1)	Frequent rapid transit service along the six-mile route between Browne's Addition and Spokane Community College, connecting through downtown and the University District, including Gonzaga University.
Frequent Routes	Local service at frequent intervals: every 15 minutes on weekdays and every 15-60 minutes on weekends.
Regional Routes	STA operates several regional and commuter routes between major destinations. These routes are designed to provide regional links and typically serve Park & Ride lots, transit centers, and key destinations during peak commute times.
Regular Routes	Local service at varying intervals: every 30-60 minutes on weekdays and varying service by route on weekends and nights. Multiple routes may serve certain segments/stops, which combine to provide more frequent service.

Source: Spokane Transit Authority

Exhibit 3.7-5. Existing Transit Routes in Spokane



Sources: City of Spokane, Fehr & Peers, 2025

While the City does not operate local transit, it supports transit by partnering with STA on street, sidewalk, and bikeway improvements that enhance transit reliability and access. The City also coordinates with STA on bus-priority treatments such as Business Access and Transit (BAT) lanes and transit signal priority.

Several projects are currently in development by STA to enhance the City's transit network. Division Street Bus Rapid Transit (BRT) is part of a regional vision to bring frequent, reliable service along the US 2 corridor within the City of Spokane. STA, the project's lead agency, is implementing several enhancements including improved passenger facilities, transit priority elements, and Business Access and Transit (BAT) lanes. Construction is expected to begin in 2028. In addition, the I-90/Valley High Performance Transit (HPT) Project is expected to establish new transit service and transit amenities, such as Park-and-Rides and transit centers throughout the region, focusing on the I-90 corridor.

Northwest Spokane

This subarea is served by STA's frequent and regular routes providing connections to Center City and east–west across the city. Frequent routes that link Northwest Spokane with Center City and Northeast Spokane include Route 4 (Monroe Street) and Route 33 (Wellesley Avenue), respectively. Other key regular routes within this area include Route 22 (Northwest Boulevard), 23 (Maple/Ash Street), Route 35 (Francis Avenue), and Route 36 (Maxwell Avenue).

Northeast Spokane

This subarea is similarly served by STA frequent and regular routes. Route 28 (Hamilton/Nevada Street) offers frequent north–south connections to the Center City, and Route 33 (Wellesley Avenue) provides frequent service between Northeast and Northwest Spokane. Consistent with STA's plans, Route 33 (Wellesley) is identified for future investment as a High-Performance Transit corridor and is slated to be the next major route improvement following Division Street BRT. Service includes continuations of Route 35 (Francis Avenue) and Route 36 (Maxwell Avenue), plus regular service of Route 27 that connects Center City and Shiloh Hills and Route 31 that connects Shiloh Hills to Spokane Community College. The City Line provides high-frequency service linking the University District and Spokane Community College, crossing the Spokane River, and connecting Northeast Spokane to Center City.

Center City

Center City functions as both a major destination and a transfer hub within the STA network, with most transit routes offering connections throughout the subarea. Several regional routes pass through Center City, linking it to other parts of Spokane County. The City Line also runs predominantly through this subarea, reinforcing its role as the core of the regional transit system.

South Hill / South Spokane

This subarea is served by Route 4, a single frequent route, that connects its southeastern neighborhoods with Center City. Regular transit routes in South Hill and South Spokane operate at lower frequencies and provide broader geographic coverage across the area. The Latah Valley currently does not have fixed route service.

West Plains

Transit in the West Plains is organized around the West Plains Transit Center (WPTC), which functions as the area's transfer hub. The area within the city limits is served by three STA routes: Route 61 (Highway 2/Fairchild), a regular route along US 2/Sunset Highway serving Airway Heights and Fairchild AFB; Route 7 (Valley/Airport), a high-speed regional link that provides service between Downtown/Spokane Valley and Spokane International Airport; and Route 6 (Cheney) providing frequent, limited-stop service between Downtown/University-District, the West Plains, and Cheney.

Vehicle Network

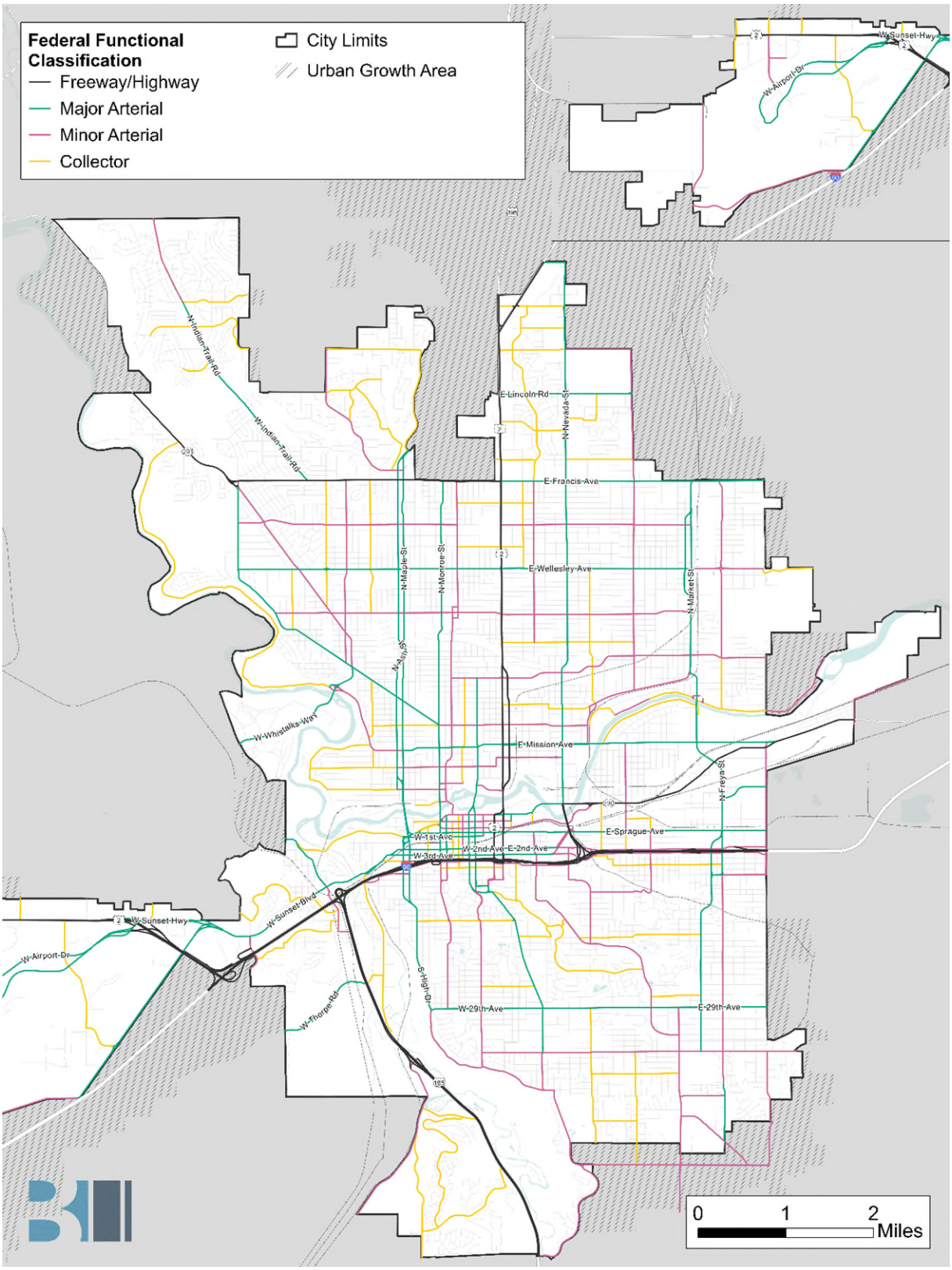
The City of Spokane is a major regional hub, with a vehicle and freight network that connects Washington, Idaho, Montana, Oregon, British Columbia, and Alberta. The City's vehicle network consists of major arterials, minor arterials, collector, and local access streets, as shown in **Exhibit 3.7-6**. Currently, the vehicle network includes five highways: I-90, US 2, SR 290, SR 291, SR 395, and SR 195. However, the regional network will soon be expanded by the completion of the North Spokane Corridor (NSC) project, a 10.5-mile multi-modal connection between I-90, US 2, and SR 395.

As part of the previous Spokane Comprehensive Plan update in 2017, the City also substantially updated their Street Design Standards[12]. The City's Street Design Standards shape the development, redevelopment, and reconstruction of facilities built in the City's right-of-way and ensure their consistency. As part of their Street Design Standards, the City provides definitions and applications for its principal street classifications. These street classifications are expected to be evaluated alongside zoning contexts when initiating the design process for modifications to the City's roadway infrastructure.

The City's vehicle network and its functional classifications are summarized in **Exhibit 3.7-6** below. The arterials tend to follow a grid pattern, especially within the Center City. The Spokane River shapes the layout of some roads, while also dividing South Spokane from the rest of the city. In addition, several bridges provide major crossing points to connect the vehicles, freight, and active transportation users. These bridges are mapped in **Exhibit 3.7-7** below.

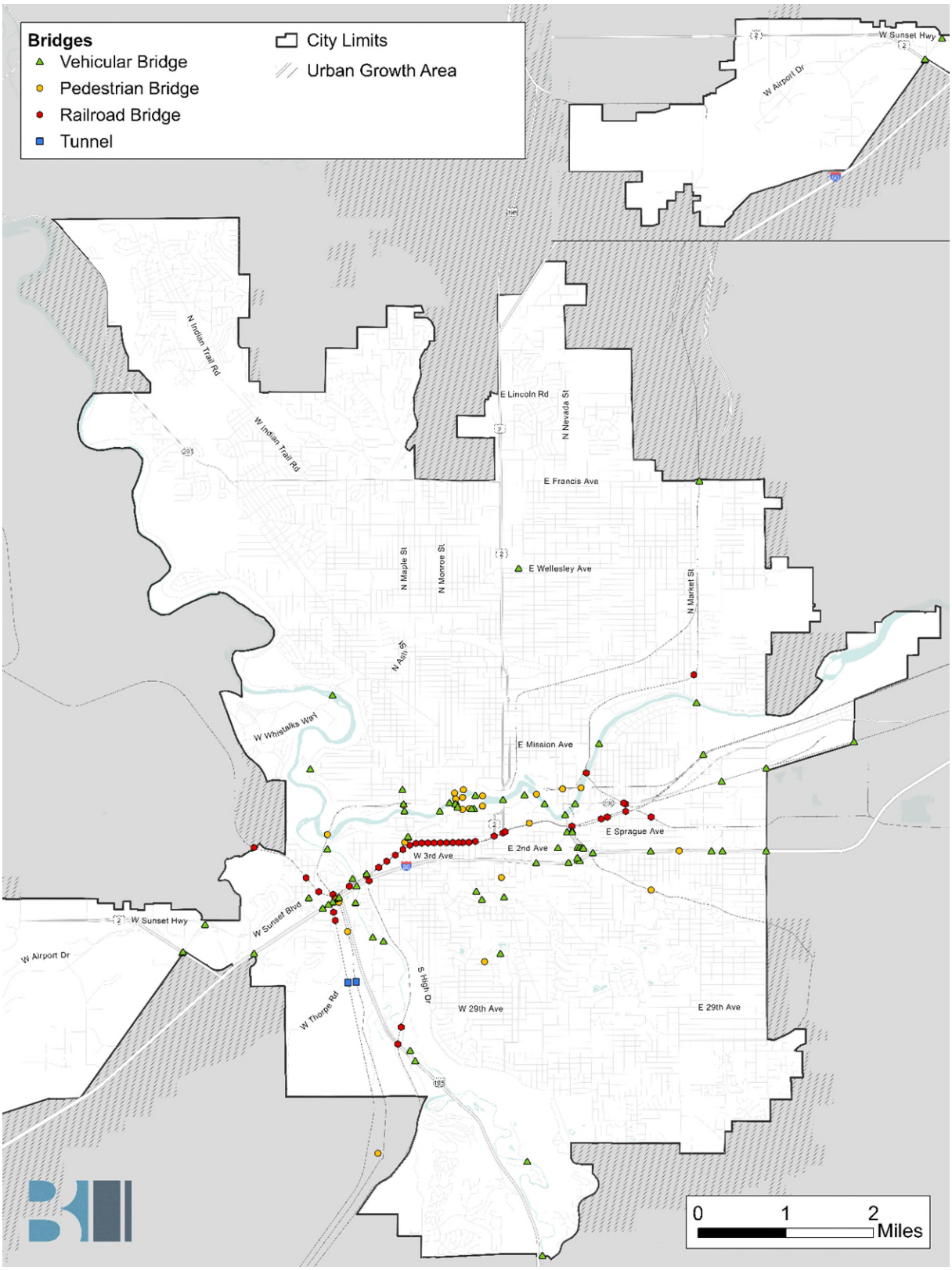
[12] City of Spokane. "Design Standards." Engineering Services. https://my.spokanecity.org/business/bid-and-design/design-standards/

Exhibit 3.7-6. Spokane Vehicle Network and Roadway Classification



Sources: City of Spokane, WSDOT, Fehr & Peers, 2025

Exhibit 3.7-7. Spokane Transportation Network Bridges



Sources: City of Spokane, Fehr & Peers, 2025

Existing Intersection LOS

The following table (**Exhibit 3.7-8**) presents 22 representative intersections selected for evaluation of existing (2024) intersection LOS as part of the EIS. These intersections were chosen to ensure a diverse sample that reflects a range of neighborhood contexts and land use contexts across the city. The selection includes locations with a range of multimodal activity, existing development, and planned growth or infrastructure investment.

Exhibit 3.7-8. Spokane Intersection LOS

Location	LOS Standard	Existing (2024) LOS
S Hatch Rd and E 57th Ave (One-way stop control)	E	*E*
S SE Blvd and E 29th Ave	E	*C*
S Grand Blvd and E 29th Ave	E	*C*
N Havana St and E Sprague Ave	E	*D*
N Napa St and E Sprague Ave	E	*C*
SR 290/E Trent Ave and N Hamilton St	D	***E***
US2/S Division St and E Sprague Ave*	F	*B*
US 2/N Ruby St and E Indiana Ave*	D	*C*
US 2/N Division St and W Buckeye Ave/E North Foothills Dr	D	*C*
US 2/N Division St and Wellesley Ave	D	***E***
US 2/N Division St and W Francis Ave*	D	*D*
US 2/N Newport Hwy and E Holland Ave	D	*D*
W 3rd Ave and S Monroe St	F	*B*
N Maple St and W Boone Ave	E	*C*
E Mission Ave and N Hamilton St	E	*D*
N Market St and E Euclid Ave	E	*D*
N T J Meenach Dr and W Northwest Blvd*	E	*D*
N Ash St and W Wellesley Ave	E	*C*
E Wellesley Ave and N Haven St*	E	*C*
N Market St and E Francis Ave	E	*D*
SR 291/W Francis Ave and N Alberta St	D	*D*
US2/W Sunset Hwy and Flint Rd	D	*C*

Notes: *Analyzed with HCM 2000; BOLD indicates LOS fails to meet standard
Sources: City of Spokane, WSDOT, Fehr & Peers, 2025

Northwest Spokane / Northeast Spokane

The roadway network in this subarea follows a mostly gridded layout, with some diagonal and curvilinear streets that respond to natural features such as the Spokane River. Major highways serving

the area include US 2/Division Steet, SR 290, and SR 291, which provide regional connections and support both local and through traffic.

Division Corridor

Division Street serves as a major north-south arterial and carries the US 2 highway designation north of I-90. East-west connectivity across Division Street is supported by several intersecting arterials. One vehicular bridge carries Division Street over the Spokane River, serving as a critical crossing point within the city's transportation network. The planned STA Division Street Bus Rapid Transit (BRT) will, in phases, convert one lane in each direction to Business-Access-and-Transit (BAT) lanes. Completion of the BRT project will coincide with the final phase of the NSC, which will shift some traffic off Division Steet.

At the intersection of US 2/Division Street at Wellesley Avenue, a state-route intersection, the applicable LOS standard is D (WSDOT). The intersection is a key crossroad serving Northwest and Northeast areas. The intersection is a focal point of the Division corridor, with heavy turning movements and frequent transit activity supporting adjacent retail and services. As the Division Street BRT project is implemented in phases, this location will sit within the BRT corridor and transit service improvements.

Center City

Center City serves as a focal point of Spokane's roadway system, with many arterial streets throughout the city designed to converge on or connect with this subarea. US 2 and I-90 are the primary highways traversing Center City, and due to the presence of geographic and infrastructure barriers, including the BNSF railway and the Spokane River, this area also contains numerous bridge crossings that facilitate multimodal and vehicular access. In addition, Center City includes several parallel one-way street couplets that concentrate north–south movements and access, notably the Monroe/Lincoln couplet and the Division/Ruby one-way couplet.

At the intersection of SR 290/E Trent Avenue and N Hamilton Street, a state-route intersection, the applicable LOS standard is D (WSDOT). Existing operations are LOS E, indicating the location fails to meet standard under current conditions. The intersection is within the South Logan TOD Planned Action Area established to implement the South Logan Transit-Oriented Development Plan.

South Hill / South Spokane

South of I-90, the street network begins as a grid but becomes more irregular where challenging topography limits road construction. I-90 and SR 195 serve as the primary highway connections in this subarea. Several vehicular bridges span SR 195, I-90, and other geographic constraints, supporting access between residential areas, employment centers, and regional corridors.

West Plains

The West Plains subarea is primarily served by I-90 and US 2, which provide east-west and regional connectivity. There are two key vehicular bridges in this area, one crossing I-90 and another crossing Sunset Highway, that facilitate access across these major corridors.

State Facilities

The City of Spokane is served by a network of state-owned highways (**Exhibit 3.7-9**) that are essential for regional mobility, freight movement, and economic development. These facilities are owned and maintained by the Washington State Department of Transportation (WSDOT) and include both Highways of Statewide Significance (HSS) and other regionally significant routes.

Exhibit 3.7-9. State Routes and Functional Classifications

Route	Functional Classification	Description and Connectivity
I-90	Urban–Interstate	A major east-west corridor connecting Spokane to Seattle and the Midwest. It is the primary interstate route through Spokane and a critical freight and passenger corridor.
US 2	Urban Other Principal Arterial	Connects Spokane to northern Idaho and western Washington. US 2 spans east-west across the West Plains and north-south between Northwest and Northeast Spokane. It provides access to Spokane International Airport and supports regional freight and commuter traffic.
US 395	Urban Other Freeways and Expressways	A north-south corridor connecting Spokane to Colville and Canada. Along Northeast Spokane, the North Spokane Corridor (NSC) is a major realignment project for this route to improve freight mobility.
US 195	Urban Other Freeways and Expressways	Connects Spokane to Pullman and Lewiston, Idaho. Within South Hill/South Spokane, it is a key highway for travel and freight south of I-90.
SR 290	Urban Other Principal Arterial	Connects downtown Spokane to Spokane Valley and Idaho. It supports commuter and freight traffic and is a designated freight corridor.
SR 291	Urban Other Principal Arterial	Serves Northwest Spokane and connects to Nine Mile Falls. It supports local and recreational travel.

Sources: WSDOT, Fehr & Peers, 2025

These classifications are consistent with WSDOT's functional classification system and are used for planning, funding, and performance monitoring purposes.

SEPA and State-Owned Facilities

The City of Spokane is evaluating adoption of the housing infill State Environmental Policy Act (SEPA) categorical exemption under RCW 43.21C.229, and potential updates to local categorical exemption thresholds as outlined in WAC 197-11-800, as part of this Comprehensive Plan EIS. This EIS evaluates those exemptions under each growth alternative, including the required multimodal transportation

analysis of impacts to the local network, neighboring jurisdictions, transit facilities, and the state transportation system. If specific adverse impacts are identified with the Action alternatives, mitigation will be proposed and implemented through locally adopted plans and development regulations consistent with RCW 43.21C.229.

In accordance with RCW 43.21C.229 and WAC 197-11-800, the City of Spokane will consult with the WSDOT when proposed SEPA exemptions or threshold increases may affect state highway facilities.

Existing State Facility Segment v/c ratios

The following table (**Exhibit 3.7-10**) summarizes selected state highway segments within the City of Spokane used to evaluate directional weekday PM peak-hour volume-to-capacity (v/c) ratios. Segments were chosen to represent a mix of facility types and land-use contexts and to align with locations where WSDOT collected directional hourly traffic counts in 2024. Planning capacities are the directional link capacities from the Spokane Regional Transportation Council (SRTC) regional travel demand model; volumes are the 2024 WSDOT counts at the listed locations. The v/c ratio equals the directional weekday PM peak-hour volume divided by the corresponding planning capacity.

Exhibit 3.7-10. Existing State Facility Performance (v/c Ratio)

Location	Roadway Type	Existing Volume/Capacity	Existing v/c Ratio
I-90 east of the US 2 interchange (Spokane)	Freeway	8,340 / 13,300	0.63
I-90 west of the Sprague Ave interchange (Spokane Valley)	Freeway	11,130 / 11,400	0.98
US 2 north of North River Dr - northbound only (Spokane)	Arterial	2,530 / 4,900	0.52
US 2 (Division St couplet) south of Euclid Ave - southbound only (Spokane)	Arterial	1,720 / 4,900	0.35
US 2 north of Walton Ave (Spokane)	Arterial	3,610 / 9,800	0.37
US 2 east of the Sunset Frontage Rd intersection	Arterial	3,080 / 6,200	0.50
SR 291 northwest of the Wind River Dr intersection	Arterial	1,290 / 6,200	0.21
SR 291 northwest of the Nine Mile Rd wye connection	Arterial	2,000 / 6,200	0.32
US 195 south of the I-90 off-ramp	Freeway	2,150 / 6,900	0.31

Location	Roadway Type	Existing Volume/Capacity	Existing v/c Ratio
SR 195 northwest of the Cheney–Spokane Rd on-ramp	Freeway	2,020 / 7,600	0.27
US 195 north of Hatch Rd (median crossover location)	Freeway	1,430 / 6,200	0.23
SR 902 south of the Geiger Blvd wye connection	Arterial	1,510 / 2,600	0.58

Sources: WSDOT, SRTC, Fehr & Peers, 2025

Northwest Spokane

Within the city, SR 291 serves the Northwest area and connects Spokane to Nine Mile Falls and SR 231. Existing v/c ratios of 0.21–0.32 indicate available corridor capacity.

Northeast Spokane

WSDOT is constructing the NSC as a new limited-access freeway that will connect I-90 to US 2 at the north end of the city. Remaining phases include the I-90 connection, with WSDOT indicating completion in 2030. Once open, the NSC adds north–south capacity for regional and local trips and facilitates a shift of traffic from local arterials to the new regional connector. SR 290/Trent Ave is an east–west state route linking the University District to the Idaho state line, functioning as an alternate to I-90 for commuter and freight movements.

South Hill / South Spokane

US 195 is the main southern corridor, linking South Hill and the Latah Valley to I-90 and downtown. Existing v/c ratios of 0.23–0.32 indicate available capacity. However, due to continued growth in the Latah Valley, a SRTC-led US 195/I-90 study was conducted which identifies a package of near- and longer-term investments, so more short trips can use local routes, and the highway can focus on regional travel.

West Plains

US 2 connects the West Plains, including industrial areas, Fairchild Airforce Base, and Spokane International Airport, to central Spokane. US 2 also connects to the neighboring City of Airway Heights. An existing v/c ratio around 0.50 indicates moderate utilization with remaining capacity.

Division Corridor

US 2/Division Street is currently the main north-south corridor for north of I-90. Existing v/c ratios of 0.35–0.52 indicate available capacity in the corridor. The planned STA Division Street BRT will, in phases, convert one lane in each direction to Business-Access-and-Transit (BAT) lanes. Completion of the BRT project will coincide with the final phase of the NSC, which will shift some traffic off Division Street.

I-90

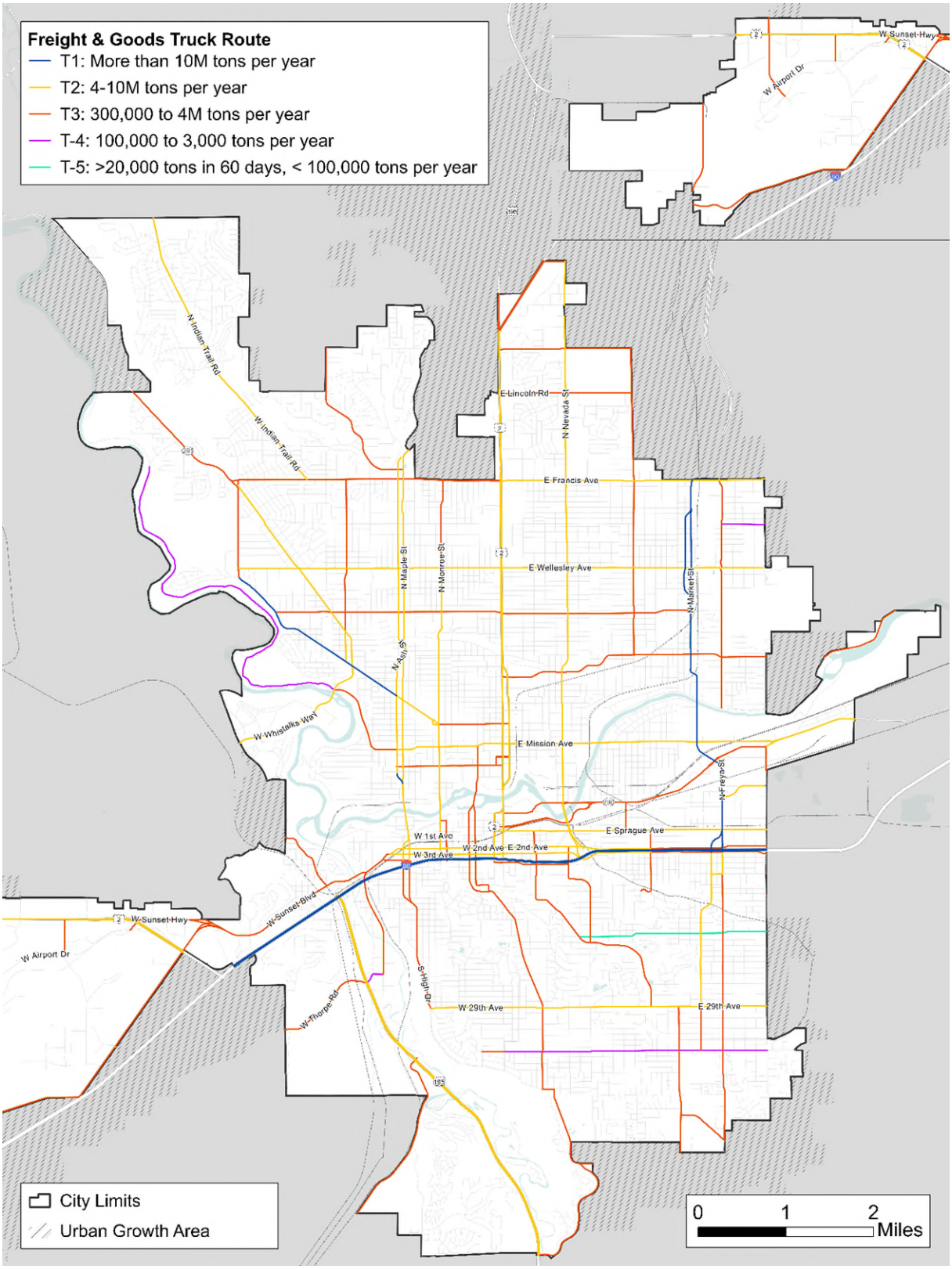
I-90 is the primary east–west corridor, carrying most regional through-traffic with limited alternatives. Existing v/c is approaching 1.0, indicating the facility is at capacity. Current regional plans focus on interchange/bridge projects and transit along the corridor; no additional mainline capacity is planned.

Freight

Spokane acts as a major distribution and logistics hub for the region, especially due to its proximity to I-90 which carries more than 10 million tons of freight per year. **Exhibit 3.7-11** below shows the City's freight network and each roadway's classification under Washington State's Freight and Goods Transportation System (FGTS). The freight network in Spokane consists of I-90, state routes, and major arterials that link the city and its key freight destinations with the local, regional, and international freight network. The new North Spokane Corridor (NSC) project is anticipated to become a new key element of the City's freight network by improving mobility and freight access. By connecting US 395 to I-90, the NSC will offer an alternative north-south route through the city, relieving pressure on local arterials.

The City's zoned industrial areas include the "Yard" in the Hillyard neighborhood of Northeast Spokane, areas surrounding Trent Avenue within Northeast Spokane, and most of the West Plains area. These zoned industrial areas are shown in an overlay in **Exhibit 3.7-11**. Nearby, Spokane Valley is home to several additional industrial zones and the Spokane Valley switching yard, which is vital to the area's railway network.

Exhibit 3.7-11. Spokane Freight Routes



Sources: City of Spokane, WSDOT, Fehr & Peers, 2025

Northwest Spokane

Compared with the northeast, Northwest Spokane has limited industrial zoning with light-industrial pockets near the Center City edge, and freight activity is driven more by through truck routes than by large industrial activity. Key designated truck routes include the Maple/Ash Street couplet, which facilitate north–south freight movements into and through downtown.

Northeast Spokane

Northeast Spokane has designated industrial land-use, including the Hillyard industrial area. These areas are served by freight corridors such as the Market/Haven Street couplet with direct connections to SR 290 (Trent Avenue) and I-90. Completion of US 395/NSC by WSDOT in 2030 will strengthen regional freight movement and facilitate a shift of north-south freight traffic from local arterials to the higher-capacity corridor.

Center City

The I-90 corridor through Center City is the second of Spokane's two T1 FGTS freight routes, serving as a critical link in the regional and international freight network. Multiple highways converge in this subarea, making it a major freight hub. As a result, much of Spokane's core freight infrastructure is concentrated in the Center City.

South Hill / South Spokane

This subarea contains no designated Heavy-Light Industrial zones and has relatively limited freight infrastructure. The few freight routes that do serve this area are classified within the lower FGTS tiers, reflecting their smaller role in regional goods movement.

West Plains

The West Plains subarea is largely industrial and plays a significant role in Spokane's freight economy. It is served by FGTS freight routes, including I-90, which provide essential connectivity to regional and national freight corridors. These facilities support the movement of goods to and from large industrial developments and the Spokane International Airport.

Safety

The Spokane Regional Transportation Council (SRTC) completed in 2024 the SRTC Regional Safety Action Plan[13], which provided a high-level overview of fatal and serious injury (FSI) crashes within Spokane County from 2018 to 2022.

Within Spokane, a large share of vulnerable-user FSI (people walking and biking) occurs on arterials and in a core area. The City's Vision Zero Action Plan identifies a 12-square-mile Priority Study Area that contains 68 of 162 vulnerable-user FSI crashes. About 85% of those vulnerable-user FSI crashes occur on the arterial system. Key contributing factors include lack of traffic control, speeding, turning

[13] SRTC Regional Safety Action Plan - Crash Analysis Technical Memorandum

movements at signals, and dark lighting conditions. Recommended countermeasures emphasize leading pedestrian intervals, protected bike facilities, shorter crossings, lighting upgrades, and ADA improvements.

Spokane's ongoing Vision Zero policies, Vision Zero Action Plan, and programs – such as speed management, signal timing upgrades and LPIs, crossing protection, ADA upgrades, and access management – aid in systematically reducing risk for all growth alternatives.

A tabulated summary of updated crash data from WSDOT (2020-2024) is shown in **Exhibit 3.7-12**. The five-year data including 2024 mirrors a similar story as SRTC's Regional Safety Action Plan that people walking and biking are over-represented in KSI relative to their share of trips.

Exhibit 3.7-12. Summary of Fatal and Serious Injury Crashes by Mode and Severity in Spokane including State Routes (2020 - 2024)

Mode Type	Fatal	Suspected Serious Injury	Suspected Minor Injury	Possible Injury	No Apparent Injury	Unknown
Bicycle	2	30	183	62	24	0
Pedestrian	42	135	332	164	12	1
Pedestrian and Bicycle		1	1	0	0	0
Vehicle-Only	54	325	1956	3585	11818	550
Grand Total	**98**	**491**	**2472**	**3811**	**11854**	**551**

Sources: WSDOT, Fehr & Peers, 2025

VMT and Mode Share

Spokane's transportation environment is summarized with two systemwide metrics: vehicle miles traveled (VMT) per capita and citywide mode share. VMT per capita is a measure of total driving by the number of people generating trips in the city. Mode share (**Exhibit 3.7-13**) shows how people choose to travel on a typical weekday across all trip purposes (drive alone, shared ride, transit, walk, and bike). Both metrics come from the SRTC regional travel model for the 2024 base year and include intrazonal travel and a standard allocation of external trips to Spokane. These values provide the reference point for the Impacts section, which evaluates whether alternatives change VMT per capita relative to No Action and whether Spokane's travel behavior shifts toward or away from non-auto modes.

VMT per capita (service population): 17.9 miles/person (weekday)

Exhibit 3.7-13. Mode share (all person trips, %)

Drive alone	Shared ride	Transit	Walk	Bike
50.6	39.5	1.2	7.3	1.4

Sources: SRTC, Fehr & Peers, 2025

Regulatory Context

Pedestrian Master Plan

The Spokane Pedestrian Master Plan[14] was adopted by City Council in 2015 and provides a framework for improving citywide walkability. The plan established Pedestrian Priority Zones to guide investments to areas based on walking access to key destinations, demand, and infrastructure deficiencies. These zones help the City target pedestrian infrastructure investments. The plan includes a pedestrian needs analysis, crash data review, and programmatic recommendations. It emphasizes closing sidewalk gaps, enhancing crossings, and integrating pedestrian planning with land use. Funding strategies include local, state, and federal sources, and the plan supports implementation through detailed project identification and prioritization.

Americans with Disabilities Act (ADA) Transition Plan

The City of Spokane's draft ADA Transition Plan[15], covering the years 2014-2019, outlines the City's commitment to provide equal access to public programs, services, and facilities for individuals with disabilities. It provided a comprehensive self-evaluation of the City's facilities and programs to understand existing barriers for individuals with disabilities and establish potential improvements and implementation steps. This document followed federal requirements outlined in Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 and recent amendments. Locally, street projects are guided by the Public Right of Way Accessibility Guideline (PROWAG). This plan was set to be updated every five years, but there have been no further publicized updates to this plan. Key themes from this plan relevant to transportation include:

- Addressing the backlog of accessibility needs on the public street system and ensuring compliance with current ADA standards across new capital projects, design standards, and plans

[14] Spokane Pedestrian Master Plan (2015). City of Spokane, project page.
Overview: my.spokanecity.org/projects/pedestrian-master-plan
[15] ADA Transition Plan (2014–2019). City of Spokane.
PDF (Draft/Plan document): ada-transition-plans-draft.pdf

- Emphasizing interdepartmental coordination, public outreach, and funding strategies to implement accessibility improvements.

Spokane Bicycle Master Plan

The Spokane Bicycle Master Plan[16], adopted in May 2017, aims to create a safe, connected, and accessible bicycling environment for all ages and abilities. It has been amended four times within the City's Comprehensive Plan update process and is complemented by the addition of a Bicycle Priority Network described below. The Bicycle Master Plan establishes a vision for enhancing bicycling opportunities, increasing bicycle mode share, and enhancing the City's bicycle network. It establishes a goal of 5% of all trips in Spokane being taken on a bicycle. The first part of this plan provided policies and action items meant to encourage construction of bicycle projects, support facilities, maintenance, education, funding, evaluation, and more. This plan also establishes a proposed 400-mile bicycle facility network as part of the 2017 Comprehensive Plan update. Facilities were expected to be prioritized as the opportunity arises.

Spokane Bicycle Priority Network

The City's Bicycle Priority Network[17] is a citywide, all-ages-and-abilities network used to prioritize bikeway upgrades when streets are improved or redesigned and strengthen grant applications. It complements, but does not replace, the adopted Bicycle Master Plan. The Bicycle Priority Network was developed with data and community-informed measures and refined with input from the Bicycle Advisory Board. The Bicycle Priority Network includes key routes with an Expanded Priority Network of important connections.

Complete Streets Ordinance

The City's Complete Streets Ordinance[18] (17H.020) was passed in December 2011 with the purpose of ensuring all users are considered in the construction of all City transportation improvement projects. It also establishes that all street projects shall include Complete Streets elements as mentioned in the Bicycle Master Plan and Pedestrian Master Plan with an additional set of performance measures which will be reviewed through an annual progress report. A 2024 update to this ordinance also established a Transportation Commission which is meant to study significant transportation issues and programs and make recommendations that align with the overall Complete Streets Ordinance.

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[16] Spokane Bicycle Master Plan. City of Spokane.
Overview: my.spokanecity.org/projects/bicycle-master-plan
[17] Bicycle Priority Network (BPN). City of Spokane.
Project page (North/South maps & interactive viewer links): my.spokanecity.org/projects/bicycle-priority-network
[18] Complete Streets Ordinance (SMC 17H.020). City of Spokane Municipal Code.
Chapter: SMC 17H.020 – Complete Streets Program

Spokane Comprehensive Plan 2017

The City of Spokane's Comprehensive Plan[19] was last updated in 2017 and provided a guiding document for growth within the City. Chapter 4 of the Spokane Comprehensive Plan outlined the city's transportation vision and strategies through 2040. It emphasized a balanced, multimodal system that supports economic vitality, public health, and environmental sustainability. Key goals included promoting transportation choices, enhancing safety, supporting economic development, and maintaining infrastructure.

Spokane Vision Zero

The Spokane Vision Zero Action Plan[20], published in June 2023, establishes the City's commitment to eliminate fatal and serious injuries among all road users. Based on analyses from 2017-2021, the plan introduces the City's Vision Zero resolutions (2022-0107), identifies high risk corridors and intersections for all users, with a focus on particularly vulnerable road users such as pedestrians and cyclists. Key strategies include:

- Infrastructure improvements (e.g., curb extensions, protected bike lanes), speed management, and public education.
- Prioritizing equity by focusing on underserved areas
- Providing performance metrics for tracking progress.

Connect Spokane

Connect Spokane[21] is STA's comprehensive public transportation plan, originally adopted in 2010 and revised in 2024. It provides a 30-year vision for transit services, focusing on High Performance Transit, fixed-route, paratransit, and flexible services. The plan is structured around guiding principles, policies, and performance standards to ensure equitable, efficient, and sustainable transit.

Key goals include expanding multimodal access, integrating land use and transit planning, and promoting equity and sustainability. The plan outlines detailed service design principles, infrastructure investment strategies, and fare policies. It also includes performance metrics and remediation strategies to ensure continuous improvement and alignment with regional development.

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[19] Spokane Comprehensive Plan (2017 update). City of Spokane.
Comprehensive Plan hub (Shaping Spokane / current plan):
my.spokanecity.org/shapingspokane/comprehensive-plan
[20] Vision Zero. City of Spokane.
Project page: my.spokanecity.org/projects/vision-zero
[21] Connect Spokane (Comprehensive Plan for Public Transportation). Spokane Transit Authority (STA).
Plan page: spokanetransit.com/projects/comprehensive-plan

Spokane Transit Authority (STA) Planning and Projects

STA operates the City's public transportation options and currently has several plans and projects[22] to expand the transit network. These plans include STA Connect 2035, the Zero-emission Transition Plan, STA Moving Forward, as well as major ongoing projects such as Division Street Bus Rapid Transit and the I-90/Valley High Performance Transit (HPT) Project.

Horizon 2045: Spokane Metropolitan Transportation Plan

Horizon 2045[23] is Spokane Regional Transportation Council's (SRTC) long-range transportation plan and was adopted in December 2021. It addresses the Spokane Metropolitan Planning Area's transportation needs through 2045, focusing on multimodal transportation, sustainability, and performance-based planning. It provides information on regionwide demographic and land use forecasts, safety and infrastructure performance targets, and public transit, freight, and active transportation strategies.

Spokane Regional Transit Council Regional Safety Action Plan

The Spokane Regional Transportation Council's Regional Safety Action Plan[24], adopted in June 2024, establishes a regional commitment to the goal of zero roadway facilities and serious injuries with target goals in 2030 and 2042, with periodic assessments every four to five years. The plan identifies high injury networks and proposes potential targeted safety improvements across Spokane County. Other elements of this plan include detailed crash analysis, community feedback, and recommended safety strategies.

Summary and Key Findings

The regulatory context for evaluating Spokane's transportation network is shaped by several key plans and upcoming projects. The Spokane Pedestrian Master Plan (2015) and Spokane Bicycle Master Plan (2017) focus on improving the pedestrian and bicycling networks, respectively, while identifying key investment areas for each mode. Meanwhile, the City of Spokane's Complete Streets Ordinance (2011) supports the City's Pedestrian and Bicycle Master Plans and provides additional sets of performance metrics to evaluate the City's transportation network. The draft ADA Transition Plan aims to ensure new street projects are guided by the Public Right of Way Accessibility Guideline (PROWAG) and meet ADA standards. The City's Vision Zero Action Plan (2023) and SRTC's Spokane Regional Safety Action

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[22] STA Planning & Projects.
Projects & Plans hub (Connect 2035, STA Moving Forward, etc.): spokanetransit.com/about-sta/projects-plans
[23] Horizon 2045 — Metropolitan Transportation Plan (MTP). Spokane Regional Transportation Council (SRTC).
MTP hub: srtc.org/our-work/core-plans-and-programs/metropolitan-transportation-plan
[24] Regional Safety Action Plan (RSAP). SRTC.
RSAP page: srtc.org/our-work/safety-planning/regional-safety-action-plan

Plan (2024) aim to eliminate traffic fatalities and injuries by targeting improvements and periodic safety assessments across the City and the region.

STA's Connect Spokane plan, along with related initiatives like the Zero-emission Transition Plan and Moving Forward, provide long-term guidance for public transit, supported by major projects such as Division Street Bus Rapid Transit and the I-90/Valley HPT Project. SRTC's Horizon 2045 regional plan addresses regional transportation needs through 2045 with a focus on sustainability and performance-based planning.

Existing conditions, gaps, and opportunities across the city are summarized below based on modal type.

Pedestrian Network

- Northwest Spokane / Northeast Spokane has several gaps in the sidewalk network, especially towards the edges of the city and along some unpaved street segments within these areas. Pedestrian priority zones are concentrated near the Spokane River, along Division Street, and near the North Spokane Corridor.
- The Center City has the highest concentration of existing sidewalks with few missing segments. Key connectors include the Post Street Bridge and the University District Gateway Bridge. Most pedestrian priority zones are located within the Center City subarea.
- South Spokane also has sidewalk gaps toward the periphery of the city, including some unpaved street segments. There are some pedestrian priority zones in this subarea, adjacent to US 2, I-90, and in the Lincoln Heights neighborhood.
- The West Plains subarea lacks a comprehensive sidewalk network and has no designated pedestrian priority zones.

Bicycle Network

- In Northwest Spokane / Northeast Spokane, east-west routes are mostly bike-friendly lacking bicycle facilities, with some shared use paths and bike lanes. North-south routes in this area vary, with higher BLTS along Maple Street and Euclid Avenue.
- The Center City subarea's bicycle network is primarily composed of shared use paths and bike-friendly routes. Despite this, some of the highest BLTS bicycle facilities are located here due to absent or substandard bicycle facilities on bicycle routes with high traffic volumes.
- The South Hill/South Spokane area features a range of bicycle facilities but generally has fewer low-stress routes compared to other subareas.
- In the West Plains subarea, the bicycle infrastructure is minimal and mostly high-stress, with limited connectivity.

Transit Network

- The subareas of Northwest Spokane / Northeast Spokane are served by many frequent routes that provide north-south connections into the Center City. East-west connectivity in this subarea is supplemented predominantly by regular routes, offering lower frequencies but greater coverage.
- The Center City subarea offers a major destination and transfer hub with most transit routes offering connections throughout the subarea, including the City Line.
- South Hill / South Spokane is served by a single frequent route connecting southeastern neighborhoods with Central City. Other routes operate at lower frequencies.
- In the West Plains subarea, transit service is served by high-speed regional routes and other regular routes.

Vehicle Network

- In Northwest Spokane / Northeast Spokane, the roadway network follows a mostly gridded layout with major highways including US 2, SR 290, and SR 291.
- In Center City, US 2 and I-90 are the primary highways, and many arterial streets converge into the Center City.
- For South Hill / South Spokane, the street network has topographical challenges south of I-90. I-90 and SR 195 are the primary highways.
- The West Plains area is primarily served by I-90 and US 2, which provide essential connectivity.
- Division Street serves as a major north-south arterial and carries the US 2 highway designation north of I-90. East-west connectivity across Division Street is supported by several intersecting arterials. One vehicular bridge carries Division Street over the Spokane River, serving as a critical crossing point within the city's transportation network.

Metrics evaluated for the vehicle network include intersection LOS and segment LOS:

- Intersection LOS was evaluated at 22 intersections within the city and WSDOT using LOS standards. Of these intersections, two locations currently fail to meet their LOS standard: S Hatch Rd/57th Avenue, located in **South Spokane**; and Division Street (US 2)/Wellesley Avenue on the **Division Street Corridor**.
- Of the state facilities that were evaluated for segment LOS, none currently have a v/c ratio higher than 1.00.

Freight Network

- Northwest Spokane / Northeast Spokane contains many designated industrial zones and a high-volume freight corridor providing connections to SR 290 and I-90.
- In the Center City, the I-90 corridor serves as a critical link in the regional and international freight network.
- In South Hill / South Spokane, there are no designated Heavy-Light Industrial zones, which translates to limited freight infrastructure. Existing freight infrastructure tends to be classified as lower-tier freight routes.

- The West Plains subarea is largely industrial with several higher-tier freight routes, including I-90, and key facilities like the Spokane International Airport.

Safety

Severe crashes in Spokane concentrate on higher-volume arterials and major intersections with people walking and biking over-represented in KSI crashes. A higher share of serious and fatal injuries, especially for vulnerable users, is clustered in Center City. The City's Vision Zero policy and related programs provide the citywide framework for prioritizing investments regardless of alternative.

VMT and Mode Share

Spokane's travel is predominantly auto oriented. VMT per capita is 17.9. Mode share: 50.6% drive alone, 39.5% shared ride, 1.2% transit, 7.3% walk, 1.4% bike. Values come from the SRTC regional model. These metrics provide the reference point for evaluating alternatives.

3.7.2 Impacts

This section provides an overview of the impacts related to each of the three future year alternatives established by the City of Spokane: Alternative 1: Stay the Course (the No Action alternative), Alternative 2: Distributed and Balanced, and Alternative 3: Center City and Regional Hubs. This section also provides an overview of the thresholds of significance used to determine each alternative's impact, a description of these proposed alternatives, methodology used to evaluate the future year analyses, and an overall summary of impacts.

Description of Evaluated Alternatives

Evaluated Alternatives

The City is evaluating three growth alternatives as part of the Comprehensive Plan update. Each alternative accommodates projected population and employment growth but differs in how development is distributed, the intensity of land uses, and the relationship to transportation infrastructure. More detailed descriptions of the land use assumptions and policy basis for these alternatives are provided in **Chapter 2**.

Alternative 1 – Stay the Course (No Action)

This alternative represents continuation of the current Comprehensive Plan, zoning, and development regulations. Growth would follow existing patterns under current rules, with jobs and housing allocated consistent with Spokane Regional Transportation Council (SRTC) projections. While this scenario provides sufficient overall capacity to meet growth targets, it does not substantially change land use or transportation relationships compared to today.

Alternative 2 – Distributed and Balanced

This alternative focuses additional housing and employment growth along frequent transit corridors and emphasizes a stronger jobs–housing balance. It applies recommendations from the Centers and Corridors Study to simplify land use designations, encourage mixed use, and support neighborhood-scale retail. Growth is more evenly distributed across the city, with capacity for housing at all income levels. Employment assumptions reflect State Employment Security Department trends. This alternative is intended to leverage the transit network to support transportation and climate goals.

Alternative 3 – Center City and Regional Hubs

This alternative directs the greatest concentration of growth to Center City, selected corridors, and regional hubs. Housing growth is focused in urban centers with high-capacity transit, while major job growth is allocated to the West Plains, Northeast Spokane, Downtown, and University District. Industrial and institutional job concentrations align with regional transportation facilities such as the airport, rail corridors, and the North Spokane Corridor (NSC). This alternative places a greater emphasis on investment in a limited number of hubs and corridors to maximize transportation infrastructure efficiency.

Analysis Methodology

The transportation analysis evaluates how each growth alternative would affect the city's multimodal network, including roadway operations (for autos and freight), transit demand, walking, bicycling, and safety conditions. Key elements of the methodology include:

Transportation Network Assumptions

This EIS uses Spokane Regional Transportation Council's (SRTC) regional travel demand model (TDM), which has a 2022 base year and a 2050 forecast horizon. Results for this study are reported for 2024 existing conditions and a 2046 horizon year. The 2024 base year is used because screenline volumes and turning-movement counts were collected in 2024 and used to validate the model for this analysis. To quantify land use for 2024 and 2046, households and employment were linearly interpolated at the Transportation Analysis Zone (TAZ) level between SRTC's 2022 base and 2050 forecasts, then input to the TDM to produce network outputs for 2024 Existing and the 2046 alternative scenarios. Resulting daily 2024 volumes from the TDM are within 2 to 4% of 2022, providing a current, representative baseline while remaining consistent with the 2022–2050 SRTC model framework.

The analysis also incorporates planned transportation investments by the City and partner agencies, and these projects provide the baseline network assumptions. Major projects particularly relevant to this analysis include:

- **North Spokane Corridor (NSC):** Completion of the NSC, along with associated transit investments.
- **Division Street Bus Rapid Transit (BRT):** Implementation of high-capacity transit service and Business Access and Transit (BAT) lanes along Division Street.

In addition to these projects, the model includes a range of roadway extensions, intersection improvements, safety enhancements, and transit upgrades delivered by the City of Spokane (Six-Year Comprehensive Street Program), Spokane County (Six-Year Transportation Improvement Program), WSDOT, and Spokane Transit Authority (Connect Spokane and the Transit Development Plan). See **Chapter 5 Appendix C Transportation Project Implementation Table** for each modeled project's lead agency, status, and funding pathway.

Regional plans are updated periodically, and additional projects may be adopted before the City's 2046 horizon year. For this EIS, these projects serve as an assumption for reasonably foreseeable transportation network improvements applied across all growth alternatives.

Travel Demand Forecasting

The Spokane Regional Transportation Council (SRTC) maintains a regional travel demand model that is used to predict how travel behavior will change based on land use and transportation network inputs. The model is a tool best used to compare the relative differences among alternatives rather than to provide a precise prediction of future travel behavior. In other words, the model identifies which growth alternatives are likely to result in greater or lesser transportation impacts, though the exact locations and magnitude of future impacts cannot be forecasted with certainty in this programmatic EIS where specific development projects are unknown.

The SRTC model is a conventional four-step model, meaning it estimates travel patterns by sequentially estimating trip generation, trip distribution, mode choice, and trip assignment. It relies on survey data, demographic information, land use assumptions, and transportation system characteristics to represent the ways people travel in the Spokane region. The model is regularly calibrated and validated to reflect observed conditions and regional travel surveys.

Key features of the SRTC travel demand model include:

- **Analysis Years:** The most recent model update established a base year of 2022 and a forecast horizon year of 2050. As noted within the Transportation Network Assumptions subsection, the results for this analysis are reported for 2024 existing conditions and a 2046 horizon year.
- **Land Use:** Land use forecasts were developed for each alternative using Transportation Analysis Zones (TAZs) that cover Spokane and the broader region. TAZ-level assumptions for households, employment, and demographic characteristics are maintained by SRTC for consistency across agencies.
- **Network Representation:** The model includes the regional roadway system, major transit services, and other multimodal infrastructure. This allows forecasts of traffic volumes, transit ridership, and other metrics on key corridors and intersections across the Spokane region.
- **Transit and Active Modes:** In addition to auto and truck travel, the model estimates demand for transit, bicycle, and walking trips, supporting analysis of multimodal system performance.
- **Travel Demand:** Travel demand is forecast across four daily time periods (AM peak, midday, PM peak, and night). For this EIS analysis focuses on the PM peak period, when the largest number of trips occur.

Vehicle Network Performance

Intersection LOS and roadway segment v/c was analyzed at the same 22 study intersections and 12 state highway segments as were analyzed in the Affected Environment Section 3.7.1. For intersections, 2024 PM peak turning movement counts provide the existing baseline, and 2046 forecasts were developed from the SRTC regional travel demand model using standard post-processing methods. For state segments, 2024 WSDOT counts provide the existing baseline, and future-year growth from the SRTC model is added to those counts with planning capacities coming from the SRTC model network. All segment results are total, weekday PM peak hour unless noted otherwise. Results are compared to adopted City LOS standards and WSDOT standards. For state facility segments, the volume to capacity (v/c) ratio is used for evaluation.

Transit and Active Modes

For each growth alternative, a comparison is drawn based on the proposed concentration of development relative to funded investments such as Division Street BRT and City Line and to pedestrian and bicycle networks. Results from the Vehicle Network Performance analysis are used to identify corridors where congestion or access constraints may affect transit reliability. Key considerations are walk access to transit service, continuity of bikeways, and major barriers. Findings are interpreted alongside VMT per capita and mode share and used to inform the determination of significant impacts and potential mitigation.

VMT and Mode Share

Vehicle Miles Traveled (VMT) is the sum of all miles traveled by vehicles in the city over the course of a particular period. For the purposes of this EIS, VMT is aggregated at the daily level using the SRTC regional travel demand model for 2024 Existing and 2046 for all alternatives and then divided by the total number of Spokane residents and workers for each scenario. Therefore, VMT per capita is an estimate of the average number of vehicle miles traveled by each Spokane resident and/or worker. This metric speaks to how travel behavior may shift with different land use concentrations and mixes as it captures changes in mode choice as well as vehicle trip length.

Mode share is the proportion of person trips taken by each travel mode. This EIS reports daily mode share for trips that begin or end within the City of Spokane using the SRTC regional travel demand model for 2024 Existing and 2046 for all alternatives. Modes are reported as drive alone (SOV), shared ride (HOV), transit, walk, and bike. Mode share indicates how travel behavior is expected to change with different land use patterns and transportation investments.

Thresholds of Significance

The thresholds used to determine the impacts of all three alternatives include both quantitative and qualitative assessments, which are described in **Exhibit 3.7-14.**

Exhibit 3.7-14. Thresholds of Significance

Performance Metric	Thresholds of Significance
Active Transportation Network Completeness	**Alternative 1 (No Action):** A significant impact is identified if the City cannot achieve 100% of the 2017 Bicycle Master Plan network by 2037 as established in the previous Spokane Comprehensive Plan (TR 5) or if pedestrian improvements are not advanced in designated Pedestrian Priority Zones. **Action Alternatives:** A significant impact is identified if network completion under the Action alternative lags relative to the No Action alternative or fails to accelerate progress toward bicycle and sidewalk network completeness.
Active Transportation Usage	**Alternative 1 (No Action):** A significant impact is identified if bicycle ridership fails to increase toward the 2017 Bicycle Master Plan goal of quadrupling by 2036 (relative to 2016 levels). **Action Alternatives:** A significant impact is identified if ridership increases are less than the No Action alternative.
Traffic Safety	**Alternative 1 (No Action):** A significant impact is identified if there is noncompliance with the City's Vision Zero resolution, adopted in late 2022, meaning there is an increased risk of any single traffic death or injury on City streets by 2042 (Vision Zero resolution horizon year). **Action Alternatives:** A significant impact is identified if an Action alternative would increase the likelihood of additional severe or fatal crashes compared to the No Action alternative.
Transit Access and Performance	**Alternative 1 (No Action):** A significant impact is identified if study intersection or corridor LOS falls below adopted standards (LOS F within Downtown and within designated Centers/Corridors; LOS E elsewhere) or if pedestrian/bicycle connections to STA facilities decline. **Action Alternatives:** A significant impact is identified if there is an impact according to the vehicle network performance thresholds for facilities used by transit.
Vehicle Network Performance	**Alternative 1 (No Action):** A significant impact is identified if vehicle operations fail to meet adopted intersection standards: LOS F (>120 seconds of delay) within the Downtown and the area bounded by and including the Spokane River, Maple Street, 5th Avenue, and Sherman Street, and within zones that are designated by the City as "Centers and Corridors"; LOS E applies elsewhere. For state routes, an impact occurs if a state facility does not meet the standard set by WSDOT (LOS D, segment volume-to-capacity (v/c) 1.00).

Performance Metric	Thresholds of Significance
	Action Alternatives: A significant impact is identified if an intersection (city or state facility) degrades from an acceptable LOS in the No Action scenario; if the intersection already exceeds LOS thresholds in the No Action scenario, then an impact is identified if delay increases by 5 or more seconds. For state route segments, a significant impact is identified if the segment v/c increases by ≥0.05 at a location already at or above 1.00 under the No Action alternative.
VMT per Capita and Mode Share	**Alternative 1 (No Action)**: A significant impact is identified if daily VMT per capita increases by ≥ 1.0 miles/person or if SOV (drive alone) share increases by ≥ 1.0 percentage point over 2024 conditions. **Action Alternatives**: A significant impact is identified if daily VMT per capita increases by 0.2 miles/person or if SOV share increases by 0.2% relative to the No Action alternative.

Sources: City of Spokane, WSDOT, SRTC, Fehr & Peers, 2025

Impacts Common to All Alternatives

This section describes the assessed impacts common to all alternatives.

Pedestrian Network

The City's Pedestrian Master Plan, which recommended policies and actions to support a more walkable Spokane, supports the City of Spokane pedestrian system upgrades. The Pedestrian Master Plan also established City Pedestrian Priority Zones, which are discussed in further detail within the Affected Environment section. This Pedestrian Master Plan acts as an implementation plan under the conditions expected as part of the No Action alternative because the No Action alternative follows the policies and actions in place during the creation of the Pedestrian Master Plan. Under the No Action alternative, these Pedestrian Master Plan improvements would be implemented to support continued growth and pedestrian activity.

With Alternative 2, housing growth would be concentrated along transit corridors, encourage mixed-use, and support neighborhood-scale retail. As redevelopment occurs in these areas, City code requires frontage improvements and reconstruction of adjoining sidewalk to meet City standards. It is expected that this alternative would not inhibit the implementation of the Pedestrian Master Plan compared to the No Action alternative.

Alternative 3 directs growth to the Center City and regional hubs, depending on high-capacity transit access and major industrial job growth. This emphasis on focused growth in targeted areas aims to maximize transportation infrastructure efficiency, which would help accelerate pedestrian improvements in these selected areas through frontage improvements. It is expected that this

alternative would not inhibit the implementation of the Pedestrian Master Plan compared to the No Action alternative.

Overall, none of the alternatives are expected to inhibit the City's ability to improve its pedestrian network and achieve future pedestrian goals. The City will continue to move forward with other neighborhood improvements, prioritization, and future planning of pedestrian improvements. In parallel, the planned refresh to the Pedestrian Master Plan will update the City's baseline and prioritization to reflect growth, needs, and project delivery since 2017.

Finding Common to All Alternatives

Growth would increase walking activity, and adopted programs will continue regardless of the selected alternative. Impacts to the pedestrian network are expected to be similar across alternatives and not result in a significant impact.

Bicycle Network

Through the City's Bicycle Master Plan, the City of Spokane provided categorizations for its various bicycle facility types and established a desired 2037 bicycle network. The Bicycle Master Plan also established a bicycle ridership goal, which aims to quadruple bicycle ridership between 2016 and 2036. The Bicycle Master Plan establishes the City's implementation plan under the conditions expected as part of the No Action alternative.

The No Action alternative retains the same policies, actions, and land use expectations as anticipated during the creation of the Bicycle Master Plan. Therefore, the improvements highlighted under the Bicycle Master Plan are expected to be implemented to support continued growth in cyclist activity.

Alternative 2 places additional housing growth along transit corridors, encourages mixed-use, and supports neighborhood-scale retail. Alternative 3 directs growth to the Center City and regional hubs based on high-capacity transit access and major industrial job growth. Neither of these growth alternatives would necessitate reducing scope or extending the timeline of implementation of the Bicycle Master Plan compared to the No Action alternative.

Finding Common to All Alternatives

None of the alternatives are expected to inhibit the City's ability to improve its bicycle network and achieve their Bicycle Master Plan goals such as increasing bicycle ridership, although implementation pace may depend on funding, land use patterns, and other construction activity.

State Facilities

The state facilities reviewed are located across the city, with a select number just outside the city limits, and include I-90, US 2, US 195, SR 902, SR 291, and SR 195. For each alternative, growth from the SRTC regional travel demand model was added to existing WSDOT 2024 counts at the study locations to

estimate future volumes. The directional link capacities from the SRTC model are used as planning capacities for this analysis.

Results in **Exhibit 3.7-15** reflect weekday PM peak hour, directional conditions at selected state segments.

Across all studied locations and all three alternatives, v/c ratios are expected to remain below 1.0; therefore, no significant state facility impacts are identified. The pattern shows modest growth and small differences among alternatives, with the following corridors nearing but not exceeding capacity:

- I-90 west of Sprague Avenue (Spokane Valley) operates at v/c of 0.88–0.90 across alternatives
- US 2 east of the Sunset Frontage Road intersection operates at v/c of 0.83–0.84
- SR 902 south of the Geiger Blvd wye connection operates at v/c of 0.87–0.89

Exhibit 3.7-15. Spokane Existing State Facility Volume-to-Capacity Ratio

Location	Roadway Type / Capacity	Alt 1 Volume	Alt 1 v/c Ratio	Alt 2 Volume	Alt 2 v/c Ratio	Alt 3 Volume	Alt 3 v/c Ratio
I-90 east of the US 2 interchange (Spokane)	Freeway 13,300	*10,960*	*0.82*	*11,030*	*0.83*	*11,030*	*0.83*
I-90 west of the Sprague Ave interchange (Spokane Valley)	Freeway 15,200	*13,590*	*0.89*	*13,320*	*0.88*	*13,640*	*0.90*
US 2 north of North River Dr - northbound only (Spokane)	Arterial 4,900	*2,620*	*0.54*	*2,730*	*0.56*	*2,790*	*0.57*
US 2 (Division St couplet) south of Euclid Ave - southbound only (Spokane)	Arterial 4,900	*1,670*	*0.34*	*1,640*	*0.33*	*1,680*	*0.34*
US 2 north of Walton Ave (Spokane)	Arterial 9,800	*3,410*	*0.35*	*3,300*	*0.34*	*3,350*	*0.34*
US 195 south of the I-90 off-ramp	Freeway 6,900	*2,670*	*0.39*	*2,730*	*0.40*	*2,730*	*0.40*
SR 902 south of the Geiger Blvd wye connection	Arterial 2,600	*2,260*	*0.87*	*2,300*	*0.89*	*2,280*	*0.88*
US 2 east of the Sunset Frontage Rd intersection	Arterial 6,200	*5,140*	*0.83*	*5,230*	*0.84*	*5,150*	*0.83*

Location	Roadway Type / Capacity	Alt 1 Volume	Alt 1 v/c Ratio	Alt 2 Volume	Alt 2 v/c Ratio	Alt 3 Volume	Alt 3 v/c Ratio
US 195 north of Hatch Rd	Freeway 6,200	*1,670*	*0.27*	*1,640*	*0.27*	*1,680*	*0.27*
SR 291 northwest of the Wind River Dr intersection	Arterial 6,200	*1,840*	*0.30*	*1,830*	*0.29*	*1,840*	*0.30*
SR 291 northwest of the Nine Mile Rd wye connection	Arterial 6,200	*2,510*	*0.40*	*2,580*	*0.42*	*2,500*	*0.40*
SR 195 northwest of the Cheney–Spokane Rd on-ramp	Freeway 7,600	*2,250*	*0.30*	*2,200*	*0.29*	*2,220*	*0.29*

Sources: WSDOT, SRTC, Fehr & Peers, 2025

Finding Common to All Alternatives

No significant impacts to state facilities are identified for any future year alternatives because all segments evaluated are expected to maintain v/c ratios below the threshold of 1.0 during the PM peak.

Environmental Justice Implications

None of the alternatives are expected to introduce adverse transportation effects on environmental justice populations. Programmed safety and access investments such as Vision Zero-related projects and sidewalk/crossing improvements would proceed with any alternative selected.

Alternative 1: No Action, Stay the Course

The No Action alternative represents the transportation conditions that can be expected if no changes are made to currently adopted policies. Therefore, this alternative acts as the baseline against which potential impacts of the Action alternatives are evaluated. This section summarizes analysis results and identifies potential transportation impacts that are expected under the No Action alternative, as growth will continue even under currently adopted policies.

VMT per Capita and Mode Share

In Spokane, a total of 4,369,000 miles is traveled on an average weekday in the Existing (2024) scenario, and that is expected to rise to 5,928,000 miles traveled in the 2046 No Action alternative. As shown in **Exhibit 3.7-16**, this translates to VMT per capita rising from 17.9 in Existing to 19.9 by 2046

with the No Action alternative. This increase reflects existing plans in which population and job growth would generate more trips, and a greater share of growth would occur in areas that lengthen average trip distances, for example the West Plains and Hillyard employment areas. Trips between the city and neighboring jurisdictions would also rise with regional growth in the future.

Exhibit 3.7-16. Existing (2024) and Alternative 1 (No Action) VMT per Capita

	Existing (2024)	2046 Alt 1 (No Action)
VMT per Capita	17.9	*19.9*

Sources: SRTC, Fehr & Peers, 2025

Mode shares (**Exhibit 3.7-17**) are expected to remain similar to today, with small increases in walking/biking and stable transit share. Just over half of trips would continue to be made by SOV and nearly 40 percent of trips would be made by HOV.

Exhibit 3.7-17. Mode Share – No Action Alternative

Mode	Existing (2024)	2046 Alt 1 (No Action)
Drive alone (SOV)	50.6%	*50.3%*
Shared ride (HOV)	39.5%	*39.5%*
Transit	1.2%	*1.2%*
Walk	7.3%	*7.5%*
Bike	1.4%	*1.5%*

Sources: SRTC, Fehr & Peers, 2025

Compared to 2024, the drive-alone share decreases from 50.6% to 50.3%. The shift translates to an increase in more active modes. Average weekday walking trips are expected to rise from approximately 68,000 to 85,500 and biking trips are expected to rise from approximately 13,500 to 16,600.

Finding

Compared to Existing (2024), a significant impact to VMT per capita is anticipated with the No Action alternative. No significant impact to mode share is expected with the No Action alternative.

Safety

At the planning scale, safety and exposure to conflicts can be evaluated using total VMT and VMT per capita for context. These metrics come from the regional model and are used to quantify the miles traveled. VMT is used as a measure for exposure because an increase in miles driven could result in more total crashes, even if the rate of crashes per miles driven remains the same.

Under No Action, population and employment growth are expected to increase the number of trips taken and average trip distances relative to Existing (2024). As a result, total VMT and VMT per capita are higher than Existing. This increase in VMT and VMT per capita translates into increased exposure on the transportation network and a corresponding increase in the number of severe and fatal crashes that could occur relative to Existing, which exceeds the threshold of significance identified for this EIS.

Finding

Because total VMT and VMT per capita increases relative to Existing (2024), the No Action alternative would have a significant safety impact at the planning scale due to the increased exposure and corresponding increase in serious and fatal crashes.

Vehicle Network (Intersections)

Exhibit 3.7-18 tabulates PM peak hour LOS results for the 22 study intersections under the No Action alternative. LOS values in **bold** are not expected to meet their applicable LOS standards. The vehicle network serves all vehicle types including transit and freight, which will be discussed within this subsection.

Exhibit 3.7-18. Spokane Intersection LOS – Alternative 1 (No Action)

Study Intersection	LOS Standard	Existing (2024) LOS	2046 Alt 1 (No Action) LOS
S Hatch Rd and E 57th Ave (One-way stop control)	E	E	***F***
S SE Blvd and E 29th Ave	E	C	*D*
S Grand Blvd and E 29th Ave	E	C	*C*
N Havana St and E Sprague Ave	E	D	*E*
N Napa St and E Sprague Ave	E	C	*C*
SR 290/E Trent Ave and N Hamilton St	D	E	***F***
US 2/S Division St and E Sprague Ave*	F	B	*C*
US 2/N Ruby St and E Indiana Ave*	D	C	*D*
US 2/N Division St and W Buckeye Ave/E North Foothills Dr	D	C	*C*
US 2/N Division St and Wellesley Ave	D	E	***F***
US 2/N Division St and W Francis Ave*	D	D	***E***
US 2/N Newport Hwy and E Holland Ave	D	D	*D*
W 3rd Ave and S Monroe St	F	B	*B*

Study Intersection	LOS Standard	Existing (2024) LOS	2046 Alt 1 (No Action) LOS
N Maple St and W Boone Ave	E	C	*C*
E Mission Ave and N Hamilton St	E	D	*D*
N Market St and E Euclid Ave	E	D	*D*
N T J Meenach Dr and W Northwest Blvd*	E	D	*E*
N Ash St and W Wellesley Ave	E	C	*C*
E Wellesley Ave and N Haven St*	E	C	*E*
N Market St and E Francis Ave	E	D	*D*
SR 291/W Francis Ave and N Alberta St	D	D	***E***
US 2/W Sunset Hwy and Flint Rd	D	C	***F***

Notes: *Analyzed with HCM 2000; BOLD indicates LOS fails to meet standard
Sources: City of Spokane, WSDOT, Fehr & Peers, 2025

Under Alternative 1, 6 of 22 study intersections would fall below their applicable LOS standards. Five of the six are on WSDOT routes, with two along the US 2/Division corridor (the Wellesley Avenue and Francis Avenue intersections), one at SR 290/E Trent Avenue and N Hamilton Street in the Center City, one at SR 291/W Francis Avenue and N Alberta Street in Northwest Spokane, and one at US 2/Sunset Highway and Flint Road in the West Plains. The remaining below-standard location is S Hatch Road and E 57th Avenue in South Spokane.

Compared to Existing (2024), 10 intersections are expected to remain at the same LOS, and 12 are expected to decline by one or more LOS grade. Despite the increase in delay, 16 of 22 intersections are still expected to meet their LOS standard under No Action.

Finding

Applying the thresholds of significance to the 2046 No Action results, 6 of 22 study intersections constitute significant impacts because they are expected to operate below their applicable standards.

Transit and Freight

STA transit routes, freight, and trucks use network intersections as part of their regular service, so any intersection impact identified with the No Action alternative may affect performance of these modes.

The intersection of US 2/Sunset Highway and Flint Road in the West Plains is part of Route 61 (Fairchild AFB) and Route 7 (Spokane International Airport). US 2/Sunset Highway is a designated T-2 freight corridor, and Flint Road is designated T-3. The intersection delays associated with LOS F could impact performance for transit and freight.

On the US 2/Division corridor (the Wellesley Avenue and Francis Avenue intersections), the intersection LOS of F and E, respectively, could impact STA Route 25 that provides north-south service along the corridor (STA's Division Street BRT project will be discussed in Section 3.7.3 Mitigation Measures). Freight performance could be impacted since US 2/Division is categorized as a T-2 freight corridor.

SR 290/E Trent Avenue and N Hamilton Street do not have a fixed transit route that uses the intersection. However, SR 290 is identified as a T-3 freight corridor, so degraded LOS and delay could impact freight performance on this route.

S Hatch Road and E 57th Avenue is crossed east–west by Route 144 (commuter route), which currently travels on the uncontrolled approaches and therefore experiences limited control delay today. The south and west legs of the intersection are part of a T-3 freight corridor; delay at the stop-controlled south leg could impact freight performance.

SR 291/W Francis Avenue and N Alberta Street is used by Route 35 (east–west on Francis) and Route 23 (turns; west/south legs). Intersection LOS E fails to meet the standard for the intersection (LOS D) and the increased delay could affect transit performance. Both SR 291/W Francis Avenue and N Alberta Street are T-3 freight corridors. The increased delay could affect freight performance.

Finding

For the No Action alternative, the following intersections fail to meet LOS standards and could have an a significant impact to freight corridors and fixed transit routes: US 2/Sunset Highway and Flint Road (LOS F), US 2/Division Street and Wellesley Avenue (LOS F), US 2/Division Street and Francis Avenue (LOS E), and SR 291/W Francis Avenue and N Alberta Street (LOS E).

Alternative 2: Distributed and Balanced

This section summarizes the model results for Alternative 2 and the impacts expected based on the thresholds of significance stated in Section 3.7.2 *Thresholds of Significance*.

VMT per Capita and Mode Share

With Alternative 2, total vehicle miles traveled in Spokane are expected to be slightly lower than with the No Action Alternative. VMT is expected to decrease to 5,732,000 on an average weekday, 3.3% below the No Action alternative. This translates to a VMT per capita (**Exhibit 3.7-19**) decreases from 19.9 (No Action) to 19.2 (Alternative 2). This reduction reflects the "distributed & balanced" growth pattern placing more new housing and jobs in established centers and along frequent transit corridors, for example the Center City and the Division Street areas, which would shorten average trip lengths. It also reflects slightly lower job growth than Alternative 1 and Alternative 3, more similar to the current jobs/housing balance.

Exhibit 3.7-19. Alternative 1 (No Action) and Alternative 2 VMT per Capita

	2046 Alt 1 (No Action)	2046 Alt 2
VMT per Capita	19.9	*19.2*

Sources: SRTC, Fehr & Peers, 2025

Relative to No Action, Alternative 2 is expected to produce minimal shifts in mode share (**Exhibit 3.7-20**) with slightly higher walk share and the same transit and bike shares. SOV trips would stay the same compared to No Action, and HOV trips would decrease slightly.

Exhibit 3.7-20. Mode Share – Alternative 2

Mode	2046 Alt 1 (No Action)	2046 Alt 2
Drive alone (SOV)	50.3%	*50.3%*
Shared ride (HOV)	39.5%	*39.3%*
Transit	1.2%	*1.2%*
Walk	7.5%	*7.7%*
Bike	1.5%	*1.5%*

Sources: SRTC, Fehr & Peers, 2025

Compared to No Action, Alternative 2 is expected to have a slight shift from shared-ride vehicular trips to active modes with approximately 86,400 walking trips and 16,700 biking trips on an average weekday, about 900 more walk trips and 100 more bike trips than No Action.

Finding

Based on the thresholds of significance used for this EIS, no significant impact to mode share or VMT is expected under Alternative 2.

Safety

At the planning scale, safety and exposure to conflicts can be evaluated using total VMT and VMT per capita for context. These metrics come from the regional model and are used to quantify the miles traveled. VMT is used as a measure for exposure because an increase in miles driven could result in more total crashes, even if the rate of crashes per miles driven remains the same.

Under Alternative 2, total VMT and VMT per capita are lower than No Action. This reflects the land use pattern of Alternative 2 that assigns more growth in centers and along transit corridors, which reduces trips and average trip distances. Compared to No Action, the corresponding reduction in VMT and VMT per capita translates into reduced exposure on the transportation network and a potential reduction in the number of severe and fatal crashes.

Finding

Total VMT and VMT per capita with Alternative 2 is expected to decrease relative to No Action; therefore, Alternative 2 does not result in a significant safety impact at the planning scale due to the reduced exposure and corresponding potential reduction in the number of severe and fatal crashes.

Vehicle Network (Intersections)

As shown in **Exhibit 3.7-21,** 17 of 22 study intersections are expected to meet their applicable LOS standard with Alternative 2, an improvement over No Action, where 16 of 22 met the standard. The five intersections that are not expected to meet their LOS standard under Alternative 2 are shown in **bold**. The vehicle network serves all vehicle types including transit and freight, which will be discussed within this subsection.

Exhibit 3.7-21. Spokane Intersection LOS – Alternative 2

Study Intersection	LOS Standard	2046 Alt 1 (No Action) LOS	2046 Alt 2 LOS
S Hatch Rd and E 57th Ave (One-way stop control)	E	**F**	***F***
S SE Blvd and E 29th Ave	E	D	*D*
S Grand Blvd and E 29th Ave	E	C	*C*
N Havana St and E Sprague Ave	E	E	*D*
N Napa St and E Sprague Ave	E	C	*C*
SR 290/E Trent Ave and N Hamilton St	D	**F**	***E***
US 2/S Division St and E Sprague Ave*	F	C	*C*
US 2/N Ruby St and E Indiana Ave*	D	D	*D*
US 2/N Division St and W Buckeye Ave/E North Foothills Dr	D	C	*C*
US 2/N Division St and Wellesley Ave	D	**F**	***F***
US 2/N Division St and W Francis Ave*	D	**E**	***E***
US 2/N Newport Hwy and E Holland Ave	D	D	*D*
W 3rd Ave and S Monroe St	F	B	*B*
N Maple St and W Boone Ave	E	C	*C*
E Mission Ave and N Hamilton St	E	D	*D*
N Market St and E Euclid Ave	E	D	*D*
N T J Meenach Dr and W Northwest Blvd*	E	E	*E*
N Ash St and W Wellesley Ave	E	C	*C*
E Wellesley Ave and N Haven St*	E	E	*E*
N Market St and E Francis Ave	E	D	*D*
SR 291/W Francis Ave and N Alberta St	D	**E**	*D*
US 2/W Sunset Hwy and Flint Rd	D	**F**	***F***

Notes: *Analyzed with HCM 2000; **BOLD** indicates LOS fails to meet standard
Sources: City of Spokane, WSDOT, Fehr & Peers, 2025

Compared to No Action, the SR 291/W Francis Avenue and N Alberta Street intersection is expected to operate with lower delay such that it would meet its LOS D standard (No Action LOS E), and SR 290/E Trent Avenue and N Hamilton Street would operate at LOS E rather than LOS F (still failing to meet the standard of LOS D).

Four of the remaining locations that would fail to meet the LOS standard under Alternative 2 are S Hatch Road and E 57th Avenue, US 2/N Division Street and W Wellesley Avenue, US 2/N Division Street and W Francis Avenue, and US 2/W Sunset Highway and Flint Road. At US 2/W Sunset Highway and Flint Road, LOS would remain at F and delay would rise from 145 seconds (No Action) to 148 seconds (Alternative 2), which is a 3 second increase and therefore below the Action alternative threshold of 5 seconds. At S Hatch Road and E 57th Avenue, US 2/N Division Street and W Wellesley Avenue, and US 2/N Division Street and W Francis Avenue, delay is incrementally reduced relative to No Action and LOS categories are unchanged.

Finding

Alternative 2 does not introduce new significant intersection impacts relative to No Action with no additional locations failing to meet LOS standards and with delays increasing by less than 5 seconds. Therefore, no significant intersection impacts are identified under Alternative 2.

Transit and Freight

Under Alternative 2, no significant intersection impacts are identified relative to the No Action alternative. The intersection of US 2/Sunset Highway and Flint Road in the West Plains remains at LOS F and delay increases incrementally by 3 seconds versus the No Action alternative. This increase is below the Action alternative threshold of 5 seconds. The remaining intersections either maintain or improve LOS/delay relative to No Action.

Finding

For Alternative 2, no significant intersection impacts are identified compared to the No Action alternative, so relative transit and freight performance would be maintained.

Alternative 3: Center City and Regional Hubs

This section summarizes the model results for Alternative 3 and the impacts expected based on the thresholds of significance stated in **Section 3.7.2** *Thresholds of Significance*.

VMT per Capita and Mode Share

With Alternative 3, total vehicle miles traveled in Spokane are expected to be 5,916,000 on an average weekday, which is slightly below the VMT with No Action and slightly higher than VMT with Alternative

2. This translates to a VMT per capita (**Exhibit 3.7-22)** decrease from 19.9 (No Action) to 19.8 (Alternative 3). This slight decrease reflects growth focused in the Center City and select regional hubs, which brings more trips closer to destinations and frequent transit routes. However, although Alternative 3 places more housing and jobs in the Center City than Alternative 2, it also assumes continued employment growth in industrial hubs, most notably the West Plains/Airport area and Northeast/Hillyard, which increases trips and yields higher total VMT than Alternative 2.

Exhibit 3.7-22. Alternative 1 (No Action) and Alternative 3 VMT per Capita

	2046 Alt 1 (No Action)	2046 Alt 3
VMT per Capita	19.9	*19.8*

Sources: SRTC, Fehr & Peers, 2025

Relative to No Action, Alternative 3 is expected to produce the same modest shifts in mode share (**Exhibit 3.7-23**) as Alternative 2: slightly higher walk share and slightly lower HOV share with the other mode shares remaining the same as No Action.

Exhibit 3.7-23. Mode Share –Alternative 3

Mode	2046 Alt 1 No Action	2046 Alt 3
Drive alone (SOV)	50.3%	*50.3%*
Shared ride (HOV)	39.5%	*39.3%*
Transit	1.2%	*1.2%*
Walk	7.5%	*7.7%*
Bike	1.5%	*1.5%*

Sources: SRTC, Fehr & Peers, 2025

Compared to No Action, Alternative 3 is expected to have a slight shift to from shared-ride vehicle trips to active modes with approximately 88,600 walking trips and 17,000 biking trips per day, which is about 3,100 more walk trips and 400 more bike trips than No Action.

Finding

Based on the thresholds of significance used for this EIS, no significant impact to mode share or VMT is expected under Alternative 3.

Safety

At the planning scale, safety and exposure can be evaluated using total VMT and VMT per capita for context. These metrics come from the regional model and are used to quantify the miles traveled. VMT is used as a measure for exposure because an increase in miles driven could result in more total crashes even if the rate of crashes per miles driven remains the same.

Under Alternative 3, total VMT and VMT per capita are lower than No Action. This reflects the land use pattern of Alternative 3 that assigns more growth in centers and along transit corridors, which reduces trips and average trip distances. Compared to No Action, the corresponding reduction in VMT and VMT per capita translates into reduced exposure on the transportation network and a potential reduction in the number of severe and fatal crashes.

Finding

Total VMT and VMT per capita with Alternative 3 is expected to decrease relative to No Action; therefore, Alternative 3 does not result in a significant safety impact at the planning scale due to the reduced exposure and corresponding potential reduction in the number of severe and fatal crashes.

Vehicle Network (Intersections)

As shown in **Exhibit 3.7-24,** 17 of 22 study intersections are expected to meet their applicable LOS standard with Alternative 3, an improvement over No Action. The five intersections that are not expected to meet their LOS standard under Alternative 3 are shown in **bold**.

Exhibit 3.7-24. Spokane Intersection LOS – Alternative 3

Study Intersection	LOS Standard	2046 Alt 1 (No Action) LOS	2046 Alt 3 LOS
S Hatch Rd and E 57th Ave (One-way stop control)	E	**F**	***F***
S SE Blvd and E 29th Ave	E	D	*D*
S Grand Blvd and E 29th Ave	E	C	*C*
N Havana St and E Sprague Ave	E	E	*D*
N Napa St and E Sprague Ave	E	C	*C*
SR 290/E Trent Ave and N Hamilton St	D	**F**	***E***
US2/S Division St and E Sprague Ave*	F	C	*C*
US 2/N Ruby St and E Indiana Ave*	D	D	*D*
US 2/N Division St and W Buckeye Ave/E North Foothills Dr	D	C	*C*
US 2/N Division St and Wellesley Ave	D	**F**	***F***
US 2/N Division St and W Francis Ave*	D	**E**	***E***
US 2/N Newport Hwy and E Holland Ave	D	D	*D*

Study Intersection	LOS Standard	2046 Alt 1 (No Action) LOS	2046 Alt 3 LOS
W 3rd Ave and S Monroe St	F	B	*B*
N Maple St and W Boone Ave	E	C	*C*
E Mission Ave and N Hamilton St	E	D	*E*
N Market St and E Euclid Ave	E	D	*D*
N T J Meenach Dr and W Northwest Blvd*	E	E	*D*
N Ash St and W Wellesley Ave	E	C	*C*
E Wellesley Ave and N Haven St*	E	E	*E*
N Market St and E Francis Ave	E	D	*D*
SR 291/W Francis Ave and N Alberta St	D	**E**	*D*
US2/W Sunset Hwy and Flint Rd	D	**F**	***F***

Notes: *Analyzed with HCM 2000; BOLD indicates LOS fails to meet standard
Sources: City of Spokane, WSDOT, Fehr & Peers, 2025

Compared to No Action, SR 291/W Francis Avenue and N Alberta Street improves to meet LOS standard, and SR 290/E Trent Avenue and N Hamilton Street improves from LOS F to LOS E (failing to meet the standard of D).

The remaining locations failing to meet standard under Alternative 3 are S Hatch Road and E 57th Avenue, US 2/N Division Street and W Wellesley Avenue, US 2/N Division Street and W Francis Avenue, and US 2/W Sunset Highway and Flint Road. At these intersections, delay is incrementally improved compared to the No Action alternative.

Finding

Alternative 3 does not introduce significant intersection impacts relative to No Action with no new locations exceeding LOS thresholds and with delay improving incrementally. Therefore, no significant intersection impacts are identified under Alternative 3.

Transit and Freight

Under Alternative 3, no significant intersection impacts are identified relative to the No Action alternative; all intersections that exceed LOS thresholds would either maintain or improve LOS and delay relative to No Action.

Finding

For Alternative 3, no intersection impacts are identified compared to the No Action alternative, so relative transit and freight performance would be maintained.

Summary of Impacts

Exhibit 3.7-25 summarizes impact findings across the alternatives. The purpose of this programmatic EIS is to disclose how potential land use may affect the transportation system relative to what would occur with currently adopted designations and policies (the No Action alternative). Accordingly, the impacts of each Action alternative are assessed against the performance of No Action. Impacts expected to occur as a result of the No Action alternative are also expected under the Action alternatives, even if the Action alternatives do not result in additional significant impacts.

Exhibit 3.7-25. Summary of Significant Impacts

Impact Type	Alternative 1 — No Action	Alternative 2	Alternative 3
Pedestrian Network	None	None	None
Bicycle Network	None	None	None
Transit	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action
Safety	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action
VMT per Capita	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action
Mode Share	None	None	None
Vehicle Network (Intersection LOS)	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action
State Facilities	None	None	None
Freight	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action

Source: Fehr & Peers, 2025

The Action alternatives perform similarly across categories. Relative to No Action, VMT and VMT per capita decrease under both Action alternatives, so no significant impacts to VMT per capita or safety are identified for the Action alternatives.

For the vehicle network, measured with intersection LOS, the Action alternatives would not result in additional impacts beyond the performance expected with the No Action alternative. The same intersections serve transit and freight, so no additional impacts are identified for these categories.

No significant impacts to state facilities, the pedestrian network, the bike network, or mode share are expected with any of the alternatives.

3.7.3 Mitigation Measures

The focus of an EIS is to disclose the potential impacts of the Action alternatives rather than mitigate conditions under the currently adopted land-use planning (the No Action alternative). For the alternatives evaluated, the Action alternatives have no impact or no additional impact beyond the No Action Alternative.

This section identifies programmatic mitigation measures that the City of Spokane can apply to avoid or minimize transportation impacts across all alternatives. Measures are presented in three sections: projects and policies already incorporated in the plans; regulatory/committed tools that apply citywide regardless of alternative; and other potential mitigation measures.

Incorporated Plan Features

Several projects and policies are included in the analysis and serve as baseline mitigation because they improve traffic operations, safety, and multimodal access for all alternatives.

US 2/Division Street and NSC

US 2/Division Street is a north-south corridor that carries all modes of traffic. STA's Division Street BRT project will repurpose one lane in each direction for Business Access and Transit (BAT) lanes; however, the final project phase is planned to coincide with opening of the North Spokane Corridor (NSC), which will add new north-south freeway capacity for regional and local connectivity. Construction of the BRT project in phases is expected to maintain vehicle capacity, with completion of the NSC aiding in the transition of the Division Corridor towards a transit and local access context. From a freight perspective, the NSC will aid access between I-90 and the Hillyard industrial area and provide a faster regional alternative to north-south arterials for freight traveling between Spokane and destinations to the north. The NSC will help serve growing demand among all alternatives; however it will not resolve congestion or localized constraints on the local network.

City Line and STA High-Performance Transit (HPT)

The City Line continues to provide frequent east–west service across central Spokane, which is coupled with improvements that make transit more accessible. STA aims to deliver six HPT corridors as part of STA Moving Forward, a voter approved initiative to expand regional service. HPT will provide additional passenger capacity and connectivity both within the City of Spokane and across Spokane County.

Pedestrian and Bike Master Plans

The City's Pedestrian Master Plan (2015) sets policies and actions to make Spokane more walkable, including a toolbox to guide sidewalk and crossing upgrades across the city. The Bicycle Master Plan

(2017) and Bicycle Priority Network (2024) provide a strategy to expand safe bicycling for all residents, with policies and projects that build a connected, lower-stress system.

Vision Zero and Complete Streets

The City has adopted Vision Zero and formalized it via Council resolution, followed by a 2023 Action that sets strategies and monitoring for the reduction in serious and fatal crashes. Spokane's Complete Streets program requires streets to be safely accessible for all users, and a 2025 ordinance updated the code and added links to the Pedestrian Master Plan and Bicycle Priority Network.

Areas Not Subject to Infill Exemption (City Core Focus)

The City of Spokane is evaluating adoption of SEPA categorical exemptions for infill housing under RCW 43.21C.229. The potential exemption area will be identified by walk access to major transit stops served by frequent and regular STA routes. Core locations where transit can support infill include Center City, the Division Street Corridor, and the core of Northwest and Northeast Spokane, which have a higher density of major stops and service frequency.

Outside the core, neighborhoods that are generally farther from frequent and regular service and therefore not proposed for a potential infill exemption include Grandview/Thorpe, West Hills, Latah/Hangman, Five Mile Prairie, and North Indian Trail.

Regulations and Commitments

Spokane's existing regulatory framework ensures that transportation improvements keep pace with growth and safety needs. Concurrency and impact fees link development to capacity projects. When thresholds are exceeded, intersection and corridor upgrades are advanced as part of the City's capital program. Frontage improvement requirements ensure that adjoining sidewalks, curb ramps, crossings, and bike elements are implemented to current standards as sites redevelop. The City also maintains partnerships with WSDOT and STA. With WSDOT, the focus is on coordination between projects, such as the NSC, and traffic operations. With STA, coordination centers on transit projects, such as Division Street BRT and future HPT corridors, to ensure accessibility for future ridership demand.

Spokane's transportation impact fee program links new development to delivery of transportation network improvements identified in the City's capital/impact-fee project lists. This program remains in place even if SEPA categorical exemptions for infill housing are adopted. Fees collected at permitting are restricted to eligible capacity and safety projects, so investments are made where growth occurs. Because the program is district-based, revenues generated in growth areas including designated infill areas can be directed to corridor and intersection improvements that support concurrency and mitigate impacts discussed within this EIS.

In summary, the SEPA categorical exemptions for infill housing do not remove transportation impact fees, frontage improvement requirements, design standards, or the City's coordination with WSDOT and STA.

Other Potential Mitigation Measures

This section introduces a range of programmatic strategies that could be implemented to reduce the impact of the growth alternatives evaluated within this EIS.

Transportation Demand Strategies (TDM)

Transportation Demand Strategies (TDM) is one potential measure that is utilized to encourage carpooling, vanpooling, transit, walking, biking, and telework to reduce single-occupancy vehicle (SOV) trips and peak demand. Deployed citywide and regionally, these measures help mitigate congestion and aid state-facility performance, freight mobility, and transit reliability.

Spokane implements TDM through the regional Commute Trip Reduction (CTR) program, branded Commute Smart Northwest and administered by Spokane County. Consistent with Washington State law, employers with over 100 employees must implement a CTR program and work toward mode share goals. The City participates in and helps fund this regional program alongside local agency partners, while Spokane County's Commute Smart Northwest provides employer services and tools across the region. The City has adopted CTR goals through Spokane Municipal Code 15.01 to align with the regional TDM strategy and advance these goals at the local level.

The City's CTR Four-Year Plan Update (2025–2029) links mode shift to safety, access, and climate goals. Spokane targets employers, residents, and students with a mix of education, incentives, and resources to facilitate mode shift. Available tools include ride matching via CommuteFinderNW.com, employer and individual incentive programs, and a guaranteed/emergency ride home. These resources are available not only to large CTR programs but also to smaller employers.

A core feature of TDM is to make other travel options more attractive and less stressful. Through continued coordination with Spokane Transit Authority, the City is facilitating the implementation of High-Performance Transit corridors in order to make transit a reliable alternative to driving alone. In addition, the Pedestrian and Bike Master Plans aid in facilitating connectivity for people who choose to walk or bike.

Spokane has the framework and service platform to scale TDM strategies. Expanding employer and development-linked measures, incentives, and access can reduce drive-alone trips and help moderate impacts identified within this EIS.

TSMO and Signal Timing

Transportation Systems Management & Operations (TSMO) is a programmatic strategy that improves reliability with intelligent transportation systems (ITS) and operational refinements rather than major construction. Core tools include periodic signal retiming and coordination, refined phase/split/offset

plans, protected–permissive turn phasing and right-turn overlaps, leading pedestrian intervals and updated pedestrian clearance, upgraded detection and, where appropriate, transit signal priority and queue jumps. Because these measures are relatively low-cost with lower overhead, they can be iterated as conditions change and paired with capital projects.

For the intersection of SR 290/E Trent Avenue and N Hamilton Street, the South Logan Transit-Oriented Development (TOD) Plan identifies signal tools such as signal phase adjustments and right-turn overlaps to maintain operations as the area develops. This EIS is consistent with that approach, and the same signal timing adjustments can be implemented and adjusted as volumes grow. Complementary TSMO strategies including wayfinding and driver information to parallel routes like the adjacent Martin Luther King Jr Way corridor can help redistribute peak traffic and avoid oversaturation of the intersection . Together, these programmatic measures paired with ongoing monitoring and retiming can maintain operations as land-use activation occurs.

Agency Partnerships

WSDOT, Spokane Transit Authority (STA), Spokane County, and the Spokane Regional Transportation Council (SRTC) provide critical transportation facilities, services, data, and funding pathways for the City of Spokane. The City has a long history of working with these partners to expand multimodal access to and within Spokane, and continued coordination is essential to evolve the regional network.

For transit service, mitigating delay and improving speed and reliability will require close coordination with STA. For Division Street BRT, the City and STA will continue to work towards phasing and implementation for the transit corridor. The City will also coordinate with STA to enhance first and last-mile access improvements along transit routes.

Partnering with the County and other regional agencies on a unified TDM program leverages resources to provide a robust program with opportunities for targeted programs within the City.

On state facilities, Spokane will continue to partner with WSDOT to coordinate on critical regional corridors including I-90, US 2, US 195, SR 290, SR 291, and related ramp terminals and bridges.

3.7.4 Significant Unavoidable Adverse Impacts

Relative to No Action, the Action alternatives maintain or incrementally improve mode share and have lower VMT per capita, which translates into slight improvements or no change in transit, freight, and safety performance. The Action alternatives would not cause any additional intersections to fall below standards, and for intersections that already fall below the LOS standard under No Action, the Action alternatives would add less than 5 seconds of average control delay relative to No Action. In addition, the Action alternatives would maintain all evaluated state facilities below a v/c ratio of 1.0 and would not degrade pedestrian or bicycle operations at the citywide scale.

Therefore, applying the thresholds in **Section 3.7.2**, neither Action alternative is expected to result in a significant adverse transportation impact.

3.8 Public Services

This section describes current conditions for public services and analyzes changes in demand based on each alternative's level and location of growth. Public services analyzed in this section include police, fire and emergency medical services (EMS), schools, parks, libraries, and solid waste. An impacts analysis for environmental justice, as it relates to parks and emergency services access, is also included.

Thresholds of significance utilized in this impact analysis include:

- **Police/Fire/EMS** – Increased demand for police or fire and emergency that cannot be accommodated through regular planning and staffing processes.
- **Schools** – Increased public school enrollment and demand on capital facilities, and broadband that cannot be addressed through regular school planning processes.
- **Parks** – Decreased park level of service (LOS), as defined in the Spokane Parks Master Plan (acres of developed park land per 1,000 people, and percent of households that can reach a public park or school ground in 10-minute walk)
- **Libraries** – Recommended square feet per capita LOS not met, as defined in the City of Spokane Capital Facilities Plan
- **Solid Waste** – Collections per household per month that would result in major investments exceeding what is already planned.
- **Environmental Justice**
  - Growth in areas with existing health disparities would result in increased demand on emergency medical services and impact response times.
  - Growth in areas with high social vulnerability would result in greater pressure on existing parks and recreation services.

3.8.1 Affected Environment

Police

The Spokane Police Department (SPD) has 333 commissioned police officers and 91 full-time civilian staff members (City of Spokane, 2025). The City is authorized for 354 commissioned positions. Volunteers also provide support and completed more than 27,000 volunteer hours in 2023 (City of Spokane, 2025). SPD has several specialized teams, including a Violent Crimes Task Force, Special Investigative Unit, Stolen Property Enforcement and Recovery Unit, and SWAT (Spokane Police Department, 2024). There are four precincts and a police headquarters, as well as other administrative and support buildings (**Exhibit 3.8-2**).

Spokane currently employs 1.4 officers per 1,000 population (**Exhibit 3.8-1**). Staffing has been cited as a "critical issue" for the Spokane Police Department (City of Spokane, 2025). As of early 2024, the department had only two vacancies to fill after hiring 34 officers in 2023 (Spokane Police Department,

2024). However, SPD has emphasized that the department is still approximately 200 officers short of the national average officers per thousand and demand for police services exceeds capacity. Calls for service increased 14% from 2022 to 2023, with an average of 295 calls with police response each day. SPD also emphasizes proactive policing and aims to increase it by 10% between 2025 and 2027.

Exhibit 3.8-1. Police Officers per 1,000 Population

Police Officers (2025)	Population (2025)	Officers per 1,000 population
333	234,700	1.4

Source: (City of Spokane, 2025), (BERK, 2025), (Washington Office of Financial Management, 2025)

SPD has a goal of answering 95% of calls within 15 seconds after being transferred from Spokane Regional Emergency Communications (SREC). This exceeds the national standard of answering 90% of calls within 15 seconds (City of Spokane, 2025). In 2023, SPD answered 97% of calls within 10 seconds and 99.8% of calls within 20 seconds (Spokane Police Department, 2024).

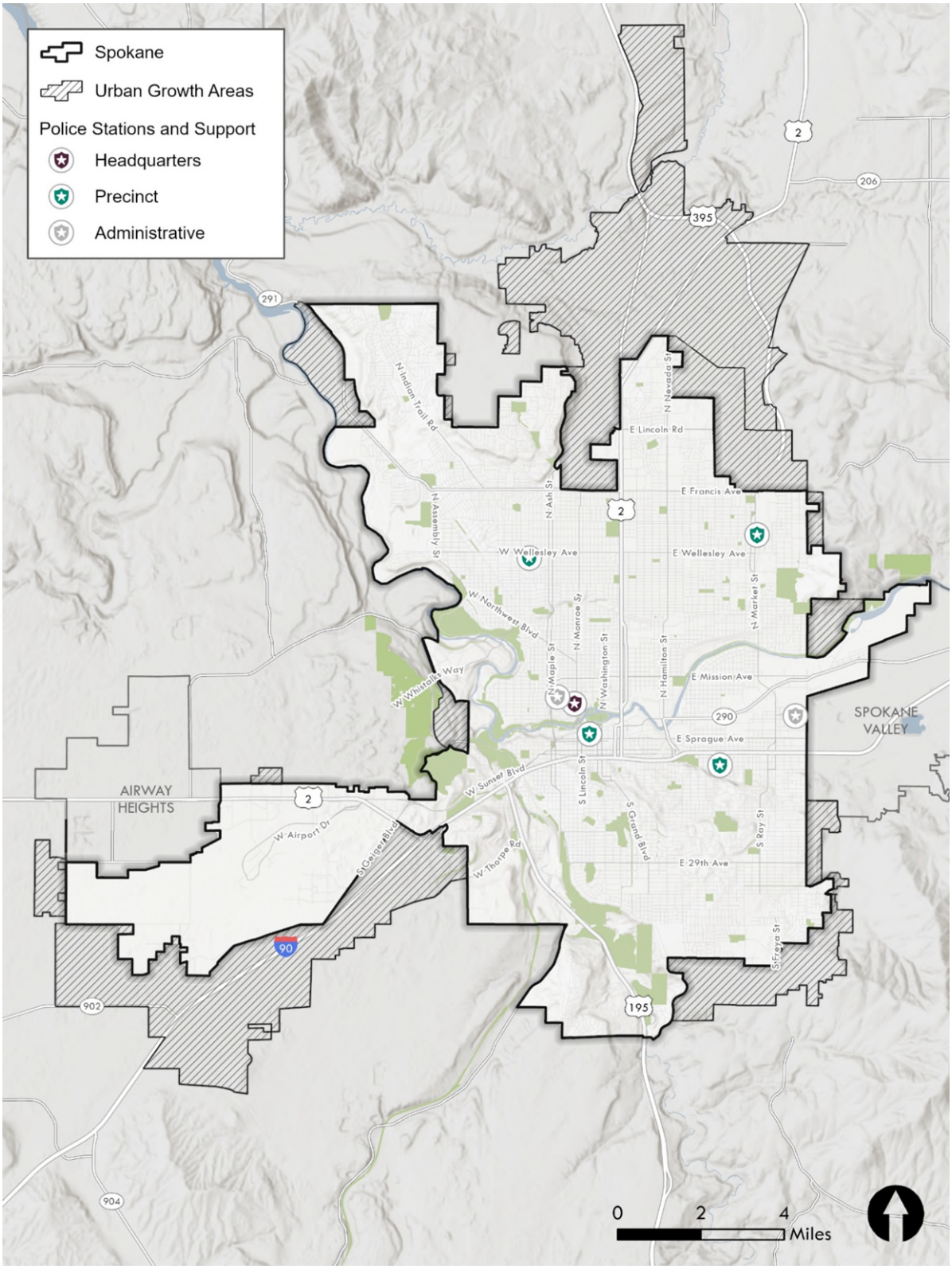
The City is moving to establish a new Emergency Communications Center in 2026 that will handle both fire and police calls.

The violent crime rate in Spokane is 7.0 per 1,000 residents and the property crime rate is 55.9 per 1,000 residents (Spokane Trends, 2023). Both rates have decreased over the past five years.

Key priorities for SPD through 2026 include:

- Implementing a comprehensive strategy to reduce violent gun crime.
- Deploying holistic, all-city strategies to address quality of life issues, including homelessness and drug use.
- Exploring community-centered policing strategies to build public trust.
- Increasing employee wellness strategies and programmatic opportunities.
- Increasing employee recruitment and retention.
- Deploying evidence-based practices to achieve organizational excellence. (City of Spokane, 2025)

Exhibit 3.8-2. Spokane Police Stations



Source: (City of Spokane, 2025; BERK, 2025)

Northwest Spokane

The Detective's Building and the Northwest Police Precinct are located in Northwest Spokane.

Northeast Spokane

The Northeast Police Precinct is located in Northeast Spokane.

Division Corridor

None of the Police Department buildings are located in the Division Corridor. Other buildings are nearby in Center City, Northwest Spokane, and Northeast Spokane.

Center City

Police Headquarters and the Downtown Police Precinct are located in Center City.

South Spokane

The South Police Precinct is located in South Spokane.

West Plains

None of SPD's facilities are located in West Plains.

Fire/EMS

Spokane is served by the Spokane Fire Department (SFD), which provides fire response services and EMS. The Department has 376 budgeted full-time fire and EMS staff, including 350 uniform staff and 25.63 civilian staff. This equals approximately 1.5 uniform staff per 1,000 Spokane residents. SFD hired approximately 39 new firefighters in 2023 and four in 2024 (Spokane Fire Department, 2024; Spokane Fire Department, 2023). There is one Fire Chief, one Assistant Fire Chief, three Deputy Chiefs, and three Staff Battalion Chiefs. SFD operates 16 fire stations throughout the city (**Exhibit 3.8-3** and **Exhibit 3.8-4**) organized into a North and a South Battalion.

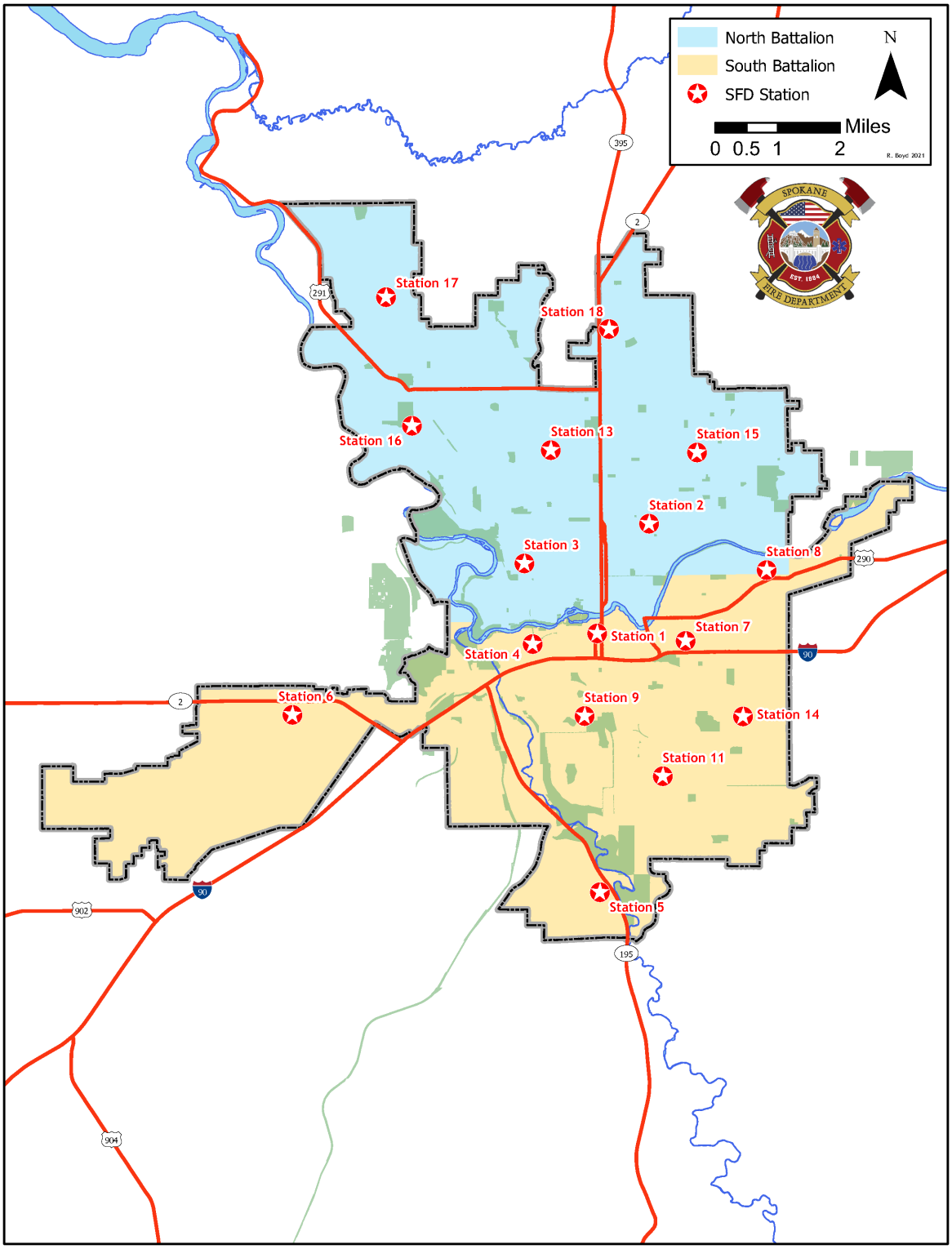
In addition to fire and EMS, the Department has several specialty teams. This includes hazardous materials response, water rescue, and a rescue task force for high-threat scenarios. SFD also provides prevention education and training (Spokane Fire Department, 2025). A Logistics Division and an Information Technology team support the Department's functions, and a Wildland Resource Planner works on Wildland Fuels Reduction and prevention.

Exhibit 3.8-3. Fire Stations and Areas Served

Station	Areas Served	Percent of 2024 Responses
Station 1	Downtown, East Central, Rockwood	18%
Station 2	Logan, Gonzaga University	7%
Station 3	Emerson/Garfield, West Central	10%
Station 4	Browne's Addition, Downtown Spokane, Sunset Hill, lower South Hill, Peaceful Valley, Grandview	9%
Station 5	Latah Valley, Hangman	1%
Station 6	West Plains, Spokane International Airport	1%
Station 7	East Central	5%
Station 8	East Central	4%
Station 9	Manito, Comstock	2%
Station 11	Lincoln Heights	6%
Station 13	Shadle, Five Mile Prairie, Northtown, Garland	7%
Station 14	Lincoln Heights, East Central, Southgate	4%
Station 15	Hillyard, Bemiss	8%
Station 16	Audubon/Downriver, Northwest	4%
Station 17	Indian Trail	2%
Station 18	Shiloh Hills	12%

Source: (Spokane Fire Department, 2025; Spokane Fire Department, 2024)

Exhibit 3.8-4. Spokane Fire Department Stations



Source: (Spokane Fire Department, 2025)

In 2024, SFD had a total of 54,279 responses, of which 88% were EMS and rescue incidents, 2% were fire incidents, and 10% were other service calls for assistance. The Department's Insurance Rating is currently a Class 3, after being downgraded in 2000 due to reductions in fire stations, staffed apparatus, and on-duty personnel (Spokane Fire Department, 2024). SFD currently has a goal to achieve a Class 2 rating.

As described above in **Police**, fire and police calls will move from SREC to a new City Emergency Communications Center in 2026.

The Department has the following objectives for response times (Spokane Fire Department, 2024):

- **Turnout Time: 90 seconds, 90% of the time.** In 2024, average turnout time was two minutes and 25 seconds.
- **Response Time (First Arriving Apparatus): 8 minutes and 30 seconds, 90% of the time.** In 2024, average response time was five minutes and 29 seconds.
- **Structure Fire Response Time: 11 minutes, 90% of the time.** The Department met this standard for 97% of structure fires in 2024.
- **Structure Fire Travel Time: First unit to arrive within 7 minutes, 90% of the time.** In 2024, average travel time was two minutes and 25 seconds.

Northwest Spokane

Northwest Spokane is served by the North Battalion and includes Stations 3, 13, 16, and 17.

Northeast Spokane

Northeast Spokane is served primarily by the North Battalion, with some overlap with the South Battalion, and includes Stations 2, 7, 8, 15, and 18.

Division Corridor

The Division Corridor is served primarily by the North Battalion, with some overlap with the South Battalion, and overlaps with Stations 1 and 18.

Center City

Center City is served by both the North and South Battalions and includes Station 1.

South Spokane

South Spokane is served by the South Battalion and includes Stations 4, 5, 7, 9, 11, and 14.

West Plains

West Plains is served by the South Battalion and includes Station 6.

Schools

School districts serving Spokane include Spokane Public Schools, Mead School District, and Cheney Public Schools (**Exhibit 3.8-5**).

Spokane Public Schools (SPS) is the main public school provider in Spokane. There are 34 elementary schools, nine middle schools, five high schools, and multiple option schools in the district (Spokane Public Schools, 2025).

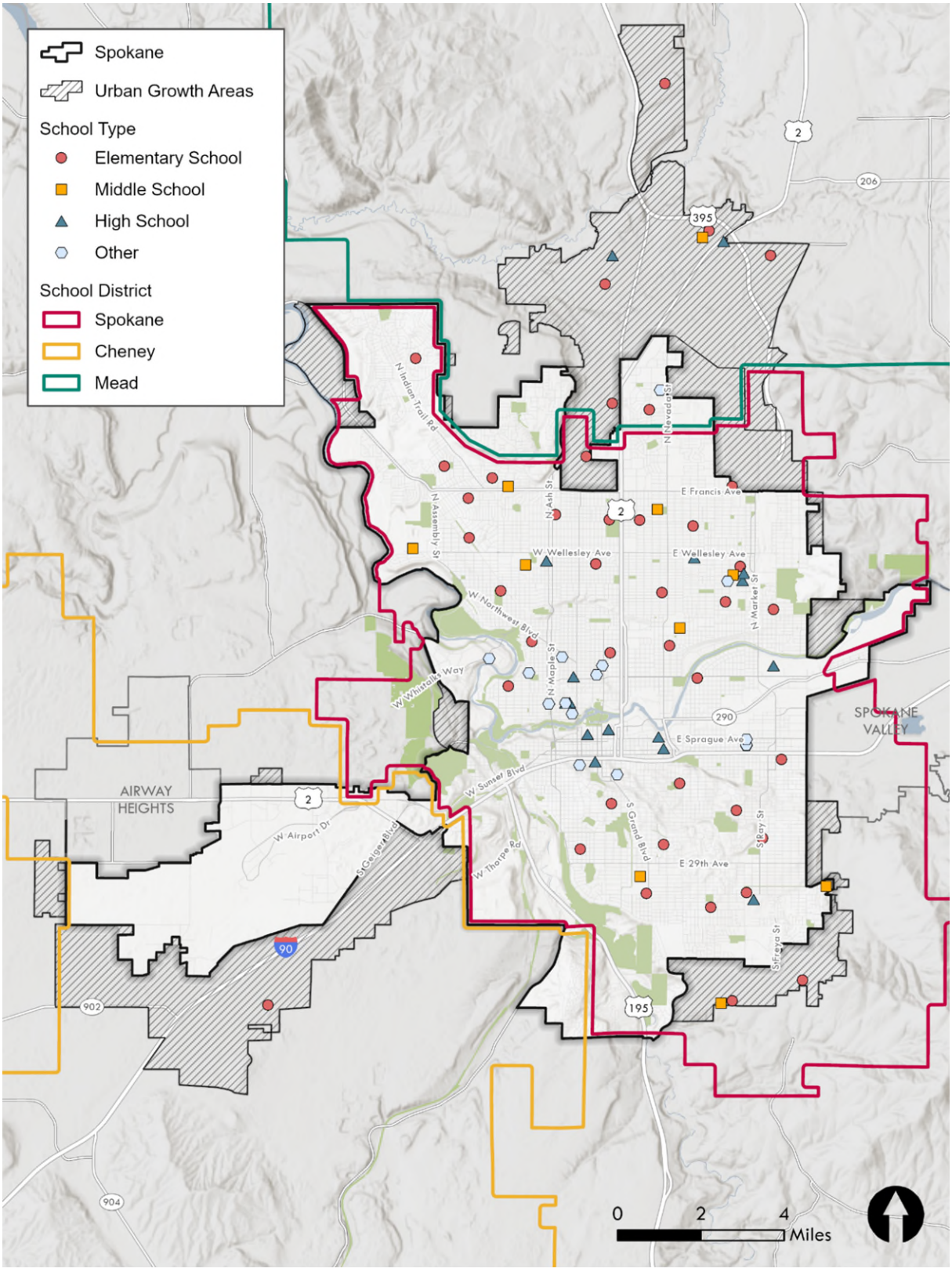
The school district serves almost 30,000 students, including 12,000 elementary school students, 6,000 middle school students, 8,000 high school students, 3,000 students in special schools, and 800 students attending virtual classes. 60% of SPS students are in households with low incomes (Washington OSPI, 2024). Only 68% of students attended 90% or more of the school days in the 2023-2024 school year. For comparison, this is lower than Seattle Public Schools, where 77% of students attended 90% or more days. The average class size is 19.1 students. RCW 28A.150.100 requires 46 instructional staff per 1,000 students, or a ratio of approximately one teacher per 21.7 students (Revised Code of Washington, 2022). The City's Capital Facilities Plan specifies a level of service standard of one teacher per 19 students (City of Spokane, 2017). SPS buildings total approximately 5,300,000 square feet.

Prior capacity issues observed in 2015 capital planning have been addressed in part by additional middle school space added through a 2018 bond measure. Based on births within the school district, SPS projects that in 5 years it will serve approximately 600 fewer students overall than in the 2024-2025 school year, with decreases in the number of elementary and middle school students and a slight increase in high school students.

Major future projects, pending voter approval of a 2025 bond, include rebuilding of Adams and Madison elementary schools, modernizing parts of North Central High School and Garry Middle School, and establishing a new Trades High School (Spokane Public Schools, 2025). Other improvements are also planned for various schools throughout the district. SPS also partners with City of Spokane Parks and Recreation through the Together Spokane Initiative, which relies on both the SPS bond and the 2025 Parks levy passing. The 2018 bond program included a total of $553 million for school projects, including the replacement of three middle schools.

Mead School District and Cheney Public Schools serve small portions of the city, with Mead School District covering some northern areas and Cheney Public Schools covering a small area around Eagle Ridge. Mead School District has a total of 17 schools serving 10,800 students and an average student to teacher ratio of 17.89. Cheney Public Schools has a total of 12 schools serving 5,700 students and an average student to teacher ratio of 16.7.

Exhibit 3.8-5. Schools and Districts in Spokane



Source: (City of Spokane, 2025; BERK, 2025)

To understand student growth in relation to population growth, the current ratio of students to housing units is shown in **Exhibit 3.8-6**. SPS and Cheney Public Schools have a similar average number of students per housing units, while Mead School District has a higher ratio.

Exhibit 3.8-6. Ratio of Students to Housing Units

School District	Students (2024-2025)	Housing Units (2024)	Students per Housing Unit
Spokane School District	29,690	108,297	0.27
Mead School District	10,761	23,742	0.45
Cheney Public Schools	5,702	18,738	0.30

Source: (Washington OFM, 2024; Washington OSPI, 2024)

Northwest Spokane

SPS facilities in Northwest Spokane include three high schools, two middle schools, and 11 elementary schools. Mead School District serves a small portion of Northwest Spokane though no schools are located within the boundaries.

Northeast Spokane

SPS facilities in Northeast Spokane include three high schools, three middle schools, and 12 elementary schools. Mead School District also serves a small area on the north end and has one elementary school within the boundaries.

Division Corridor

SPS schools in the Division Corridor include two elementary schools.

Center City

SPS schools in Center City include one high school (Lewis and Clark High School).

South Spokane

South Spokane includes one SPS high school, three middle schools, and 10 elementary schools. A small portion at the south end is served by Cheney School District though no schools are located within the boundaries.

West Plains

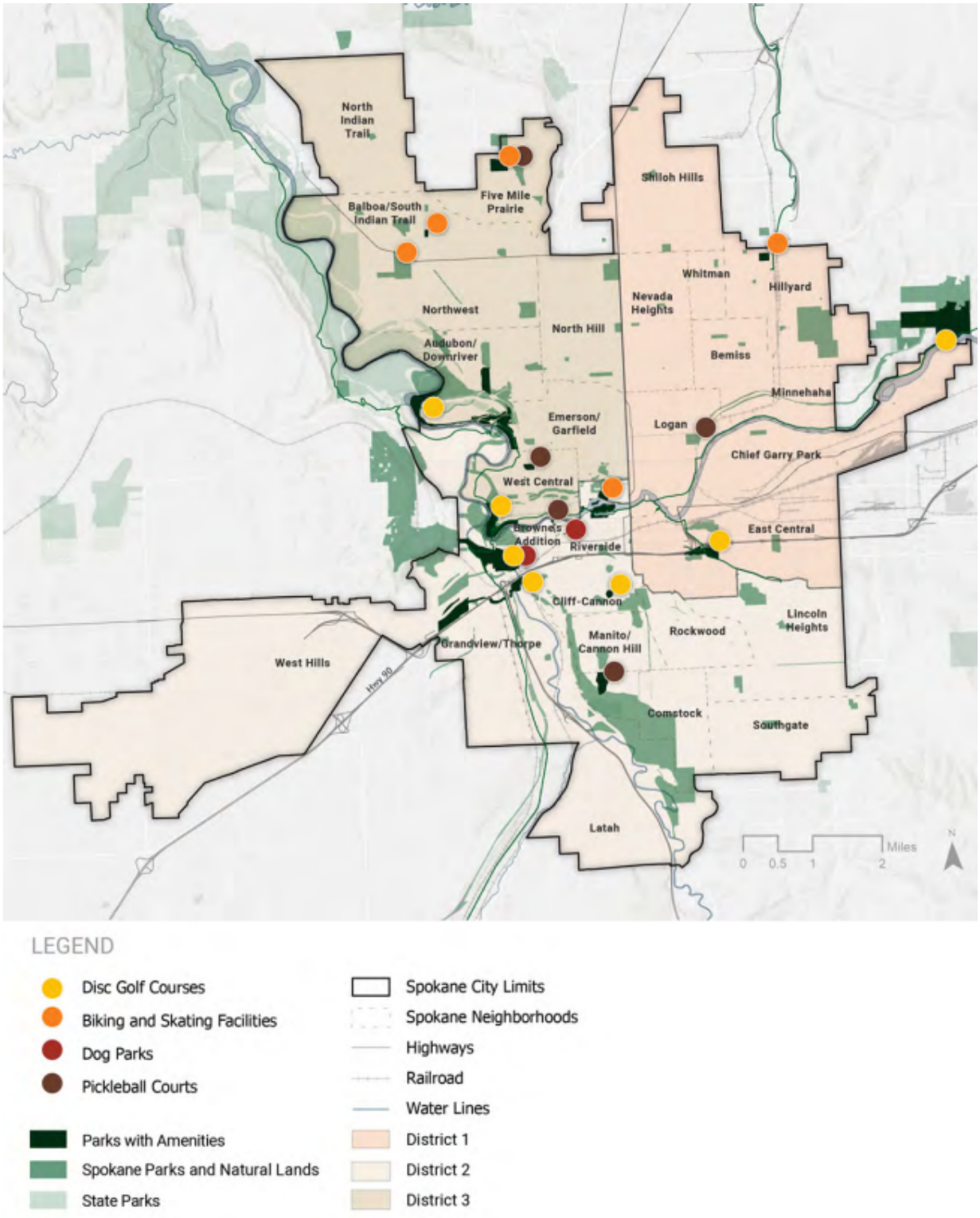
Cheney School District serves West Plains, though no schools are located within the boundaries.

Parks

The City of Spokane has approximately 130 miles of trails and 3,800 acres of parks, including 1,600 acres of natural lands (City of Spokane, 2022). Within the City's more than 87 parks, the City provides a range of facilities, including playgrounds, sports fields, sports courts, community gardens, formal gardens, dog parks, splash pads, and pools, and unprogrammed field areas. The City of Spokane also owns and manages three sports complexes, four public golf courses, six aquatic centers, and an arboretum. Natural lands provide opportunities for passive recreation and plant and animal habitat. Trails serve as corridors for pedestrian and bicycle use for both commuting and recreation. **Exhibit 3.8-7** shows the locations of City parks and amenities.

Other recreation providers in Spokane include Washington State Parks, the school district, and the YMCA, as well as private recreation providers.

Exhibit 3.8-7. Spokane Parks and Amenities



Source: City of Spokane GIS data 2021, Spokane County GIS Data

Source: (City of Spokane, 2022)

Exhibit 3.8-8. Parks Acreage

Classification	Acreage
Special Use Park	248
Community Park	297
Natural Lands	1,643
Golf Course	690
Regional Park	474
Neighborhood Park	274
Pocket Park	14
Parkway	196
Total	**3,863**

Source: (City of Spokane, 2022)

Exhibit 3.8-9. Trails Acreage

Classification	Mileage
Natural Trail (Single Track)	108
Paved Trail (Wider Track)	14
Sidewalk	8
Total	**130**

Source: (City of Spokane, 2022)

The Parks Department also provides recreational programming, including adult, youth, aquatic, community, arts, and outdoor programs. There are also Therapeutic Recreation Services programs to ensure residents with disabilities can participate.

Spokane currently provides 16.2 acres of park land per 1,000 people, including 5.8 acres of developed park land per 1,000 people (**Exhibit 3.8-10**). The neighborhoods of Shiloh Hills, Lincoln Heights, Southgate, Latah/Hangman, North Indian Trail, Five Mile Prairie, and Northwest were identified as areas with low access to parks within a 10-minute walkshed in the 2022 Spokane Parks and Natural Lands Master Plan.

Exhibit 3.8-10. Park Acres per 1,000

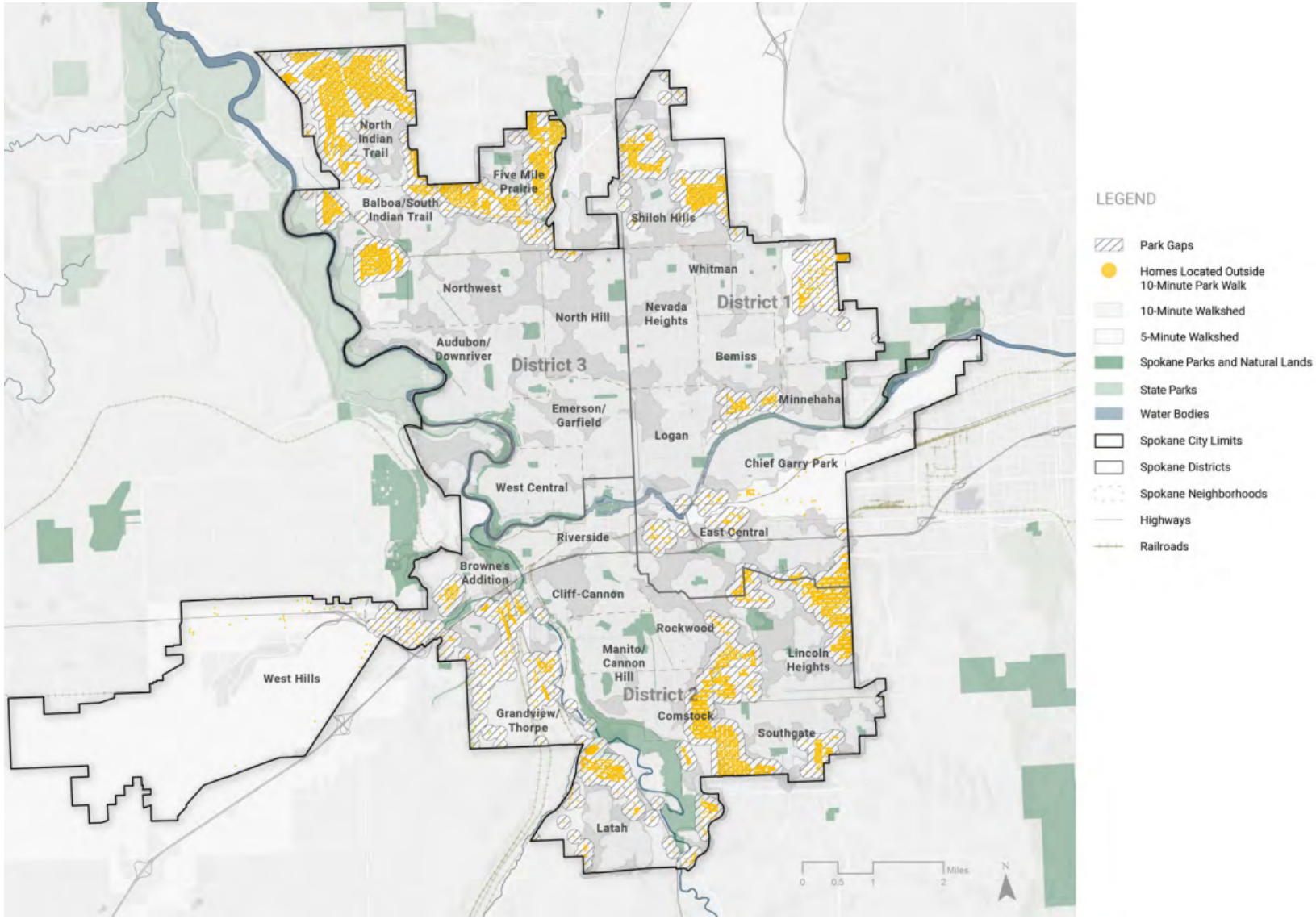
Park Classification	Number of Properties	Publicly Accessible Property Acres	Acres/1,000 population in 2020 (223,600)
Regional Park	3	474	2.1
Special Use Park	6	248	1.11
Golf Course	4	690	3.09
Community Park	12	297	1.33
Neighborhood Park	32	274	1.23
Pocket Park	13	14	0.06
Parkway	18	196	0.88
Natural Lands	17	1,643	7.25
Total	**105**	**3,836**	**17.2**
Total Excluding Golf Courses, Parkways, and Natural Lands	**82**	**1,307**	**5.8**

Source: (City of Spokane, 2022)

The 2022 Spokane Parks and Natural Lands Master Plan also found a need for more investment in a higher number of smaller projects and increased maintenance throughout the City rather than a large, singular project. Opportunities for improvement identified in the plan include:

- **Land**
  - Serving under-resourced areas of the city.
  - Reflecting the assets of the Inland Northwest.
  - Preserving natural areas.
- **Water**
  - Expanding aquatic facilities.
  - Activating the Spokane River.
  - Improving water use efficiency.
- **People**
  - Improving existing parks.
  - Building awareness of programs and facilities.
  - Improving the diversity of offerings.
  - Addressing conflicts between park users.
- **Legacy**
  - Maintaining and caring for the system.
  - Acquiring new funding sources and leveraging current assets.
  - Strategic acquisitions, partnerships, and real estate management.

Exhibit 3.8-11. Gaps in Park Access



Source: (City of Spokane, 2022)

Northwest Spokane

Northwest Spokane includes a variety of parks, including several properties along the Spokane River and the Downriver Golf Course. Riverside State Park also overlaps with Northwest Spokane. The 2022 Spokane Parks and Natural Lands Master Plan identified several gap areas for parks within a 10-minute walk on the northern end of Northwest Spokane, including North Indian Trail, Northwest, Five Mile Prairie, and Balboa/South Indian Trail.

Northeast Spokane

Parks in Northeast Spokane include various smaller properties, including Mission Park and Upriver Drive Parkway along the Spokane River, as well as the Esmeralda Golf Course and the Hillyard Senior Center. Park gap areas include parts of the Shiloh Hills, Hillyard, Bemiss, and East Central neighborhoods.

Division Corridor

Parks in the Division Corridor include Franklin Park and B A Clark Park. There are two park gap areas in the Division Corridor, including in Shiloh Hills and in East Central.

Center City

The major park in Center City is Riverfront Park, which includes properties on both sides of the Spokane River in Downtown. Park gap areas in Center City include several pockets in East Central.

South Spokane

A variety of parks are located in South Spokane, with the largest being the conservation properties on Latah Creek, High Bridge Park, and the Creek at Qualchan Golf Course. There are many park gap areas in South Spokane, including parts of the East Central, Lincoln Heights, Rockwood, Comstock, Southgate, Latah, Grandview/Thorpe, and Browne's Addition neighborhoods.

West Plains

Parks in West Plains are concentrated on the east side, as the Spokane International Airport covers much of the area to the west. Parks include Whittier Park, Finch Arboretum, and Indian Canyon Golf Course. There is a park gap area in West Plains on the eastern side as the golf course is not considered a park for this analysis.

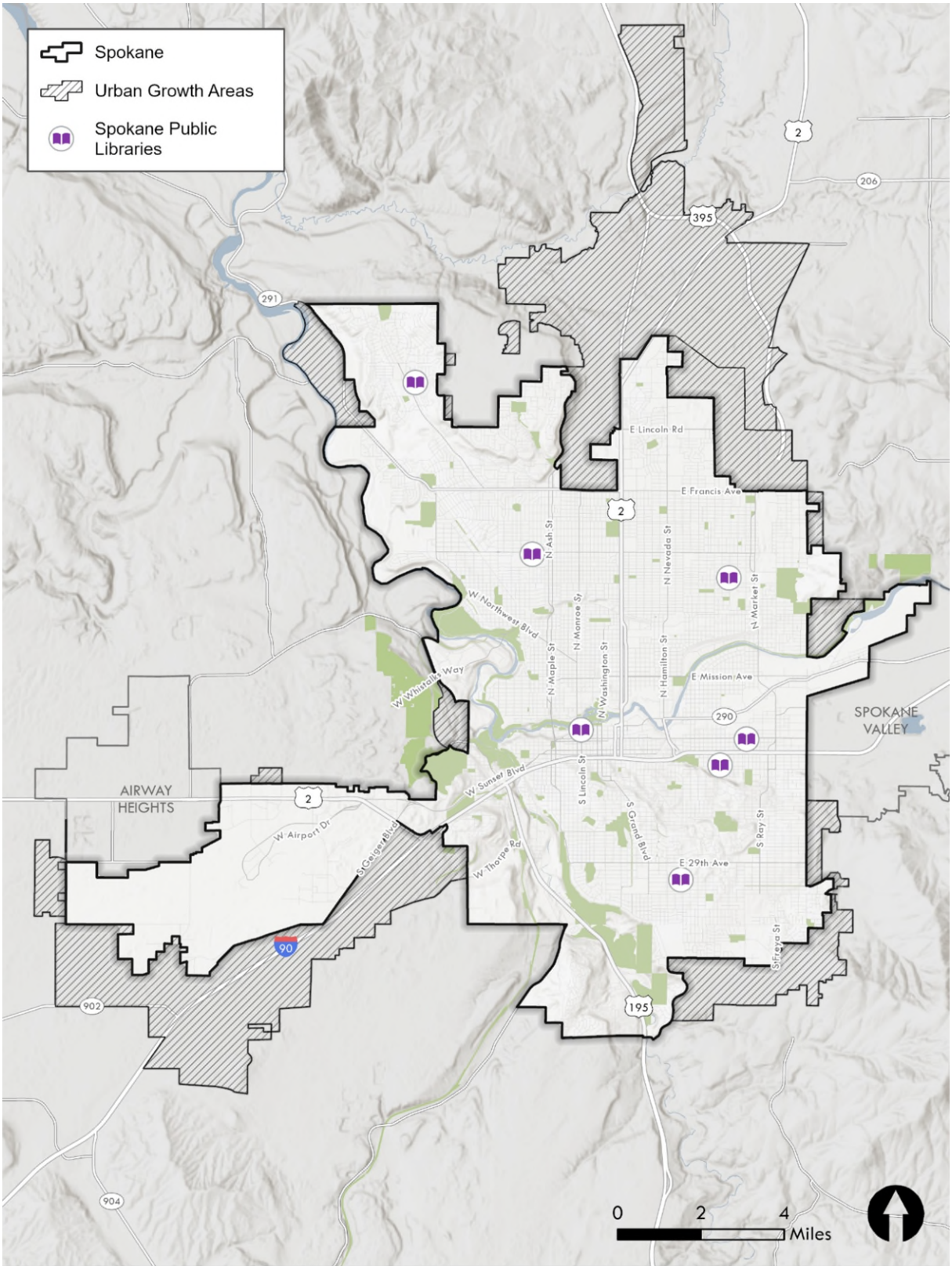
Libraries

Spokane Public Library is the library service provider in Spokane. There are seven library locations with millions of items in total, including books, movies, and music (**Exhibit 3.8-12**). There are also four library kiosks throughout the city where residents can check out and return items and pick up holds (Spokane Public Library, 2025). The library also provides events, printing, computer use, and meeting rooms (Spokane Public Library, 2025). In 2024, Spokane libraries had more than 1.2 million visitors (Spokane Public Library, 2024).

Substantial improvements to the library system have been completed recently, supported by a $77 million bond approved in 2018. Four new libraries opened in 2021, one opened in 2022, and two more opened by the end of 2023. According to the City's Capital Facilities Plan, the average life span of a library facilities is 20 to 30 years (City of Spokane, 2017). Voters also approved a levy in 2024, which is expected to raise $2.5 million in 2025, $2.52 million in 2026, and $2.55 million in 2027 ((The Spokesman Review, 2024).

Other libraries in the vicinity of Spokane include those managed by Spokane County Library District.

Exhibit 3.8-12. Libraries in Spokane



Source: (City of Spokane, 2025; BERK, 2025)

The library system, after the 2018 bond projects, now includes a total of 211,750 square feet. See **Exhibit 3.8-13**. With the estimated 2025 population of 234,700, this equals 0.9 square feet per resident. The recommended level of service is 0.813 square feet of library facilities per capita (City of Spokane, 2017). Other recommended levels of service include $50 of operating budget per capita, $7.50 of materials budget per capita, 15% of the operating budget for materials, 10.5 circulation per capita, and 60 unduplicated hours of operation per week.

The Capital Facilities Plan also specifies that, "if future development and population growth were to continue away from the city center and major corridors, the library would feel it necessary to build new facilities to serve these areas" (City of Spokane, 2017).

The 2025-2030 Capital Improvement Program has several projects planned related to library planning, all focused on improvements to information technology, such as fiber network upgrades and computing hardware (City of Spokane, 2025).

Exhibit 3.8-13. Libraries Square Footage

Library	Square Footage
Shadle Library	30,000
Central Library	117,000
Hillyard Library	12,725
Liberty Park Library	12,725
The Hive	13,700
Indian Trail Library	10,600
South Hill Library	15,000
Total	**211,750**

Sources: (Spokane Public Library, 2022) (Urban Land Institute, 2025) (MW Engineers, 2025) (MW Engineers, 2025)

Spokane Public Library's mission is to "inspire a thriving city through cultural and educational opportunities" (Spokane Public Library, 2025).

Strategic directions for the library include:

- Educate Our Citizens
- Become a Platform
- Be the Community's Partner

Northwest Spokane

Library locations in Northwest Spokane include Indian Trail Library and Shadle Park Library, as well as two kiosk locations in West Central and Five Mile.

Northeast Spokane

Northeast Spokane is served by Hillyard Library, The Hive, and Liberty Park Library. Spokane Community College Library, operated by the college, is also located in Northeast Spokane. Thrive International, a non-profit organization, is currently developing a new Spokane Public Library event and learning space and library kiosk as part of a mixed-income housing project.

Division Corridor

There are no libraries located specifically in the Division Corridor.

Center City

The Central Library serves Center City and is also a regional draw for its regular programming and events.

South Spokane

South Spokane is served by the South Hill Library and a library kiosk in Latah/Hangman. There is also a County library immediately to the south of the Southgate neighborhood.

West Plains

There are no library locations in West Plains.

Solid Waste

The City provides solid waste services, including residential and commercial services. This includes garbage, recycling, and an optional food and yard-waste collection (City of Spokane, 2025). Garbage and food and yard-waste is collected weekly, while recycling is collected every other week.

City activities include:

- Collecting solid waste.
- Operating the Valley Transfer Station, Colbert Transfer Station, and Northside Landfill.
- Collecting recyclables and yard waste.
- Administering contracts for processing of recyclables.
- Operating a moderate risk waste collection station at the Waste to Energy (WTE) Plant.
- Operating transfer activities between facilities.

- Administering permits for medical waste haulers.
- Completing illegal dumpling inspections and cleanup.
- Coordinating with the Spokane Regional Health District and City departments on facility inspections and enforcement.

Waste Management and Barr-Tech currently provide contracted recycling and compost processing.

The Waste to Energy Facility burns municipal solid waste to recover electricity. It handles 800 tons of solid waste per day, including waste from other parts of the county, and generates approximately 22 megawatts of electricity, which is enough to power 13,000 homes and earn up to $5 million in power sales each year (City of Spokane, 2025). The facility opened in 1991 to reduce amount of material sent to landfill and better protect the region's sole source aquifer. The operational life of the facility is expected to continue for the long-term, with maintenance costs of about $4 million per year (Spokane County, 2022).

The City participates in the County's solid waste planning process, which is formalized in the Comprehensive Solid Waste and Moderate Risk Waste Management Plan (Spokane County, 2022). The plan identifies a potential need for a future transfer station by 2039 in the main center part of Spokane or on the west side of the County. The 20-year capital improvements plan, however, does not include a new facility and emphasizes repairs and improvements to existing facilities. Solid waste capacity is shown in **Exhibit 3.8-14**. Recycling and composting facilities have adequate capacity for projected growth trends according to the County plan.

The City's level of service standard for solid waste and recycling is 4.33 collections per household per month (City of Spokane, 2017). The County's level of service is 800 pounds of solid waste per capita per year. The City is projected to collect 168,386 tons of solid waste from 70,164 customers in the year 2027. Spokane currently employs approximately 120 staff in its Solid Waste Department (City of Spokane, 2023)

Exhibit 3.8-14. Waste Facility Capacity

Facility	Capacity
Waste to Energy Facility	292,000 tons per year
Northside Landfill	1.5 million cubic yards total

Source: (Spokane County, 2022)

Northwest Spokane

The Northside landfill is located in Northwest Spokane. Waste from this area, and the rest of the city, is sent to the Waste to Energy Facility and recycling and compost processing facilities.

Northeast Spokane

There are no solid waste facilities located in Northeast Spokane. Waste from this area, and the rest of the city, is sent to the Waste to Energy Facility and recycling and compost processing facilities.

Division Corridor

There are no solid waste facilities located in the Division Corridor. Waste from this area, and the rest of the city, is sent to the Waste to Energy Facility and recycling and compost processing facilities.

Center City

There are no solid waste facilities located in Center City. Waste from this area, and the rest of the city, is sent to the Waste to Energy Facility and recycling and compost processing facilities.

South Spokane

The Southside Landfill is located south of South Spokane, in unincorporated Spokane County. Waste from this area, and the rest of the city, is sent to the Waste to Energy Facility and recycling and compost processing facilities.

West Plains

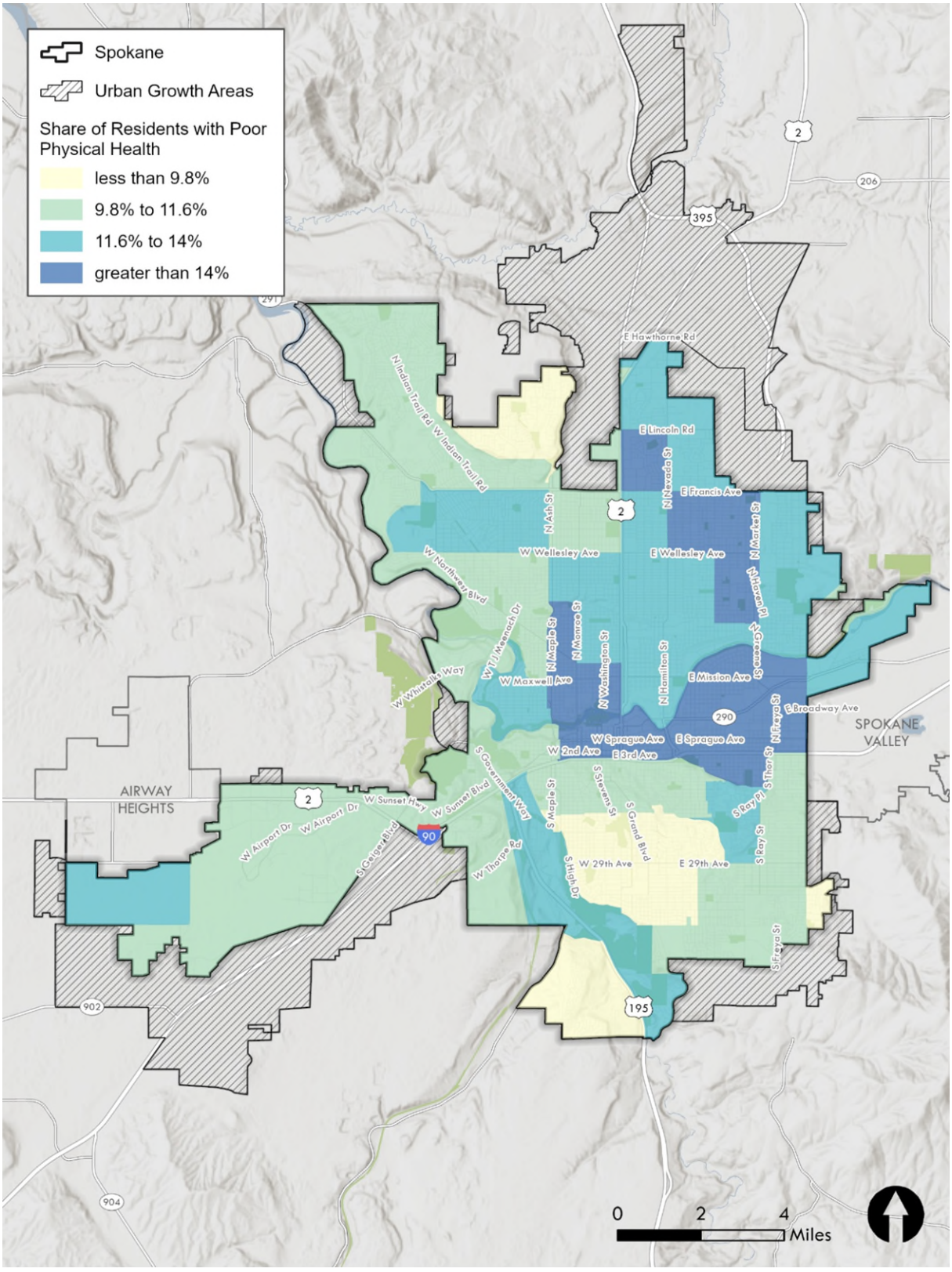
The Waste to Energy Plan is located in West Plains, near the Spokane International Airport. Waste from this area, and the rest of the city, is sent to the Waste to Energy Facility and recycling and compost processing facilities.

Environmental Justice Implications

Some areas of Spokane have higher rates of self-reported “poor” physical health in general (when provided the options of excellent, very good, good, fair, or poor) and higher rates of social vulnerability than other areas. Data from the Centers for Disease Control and Prevention (CDC) analyze rates of health conditions, including self-reported poor physical health, and social vulnerability of a community (Centers for Disease Control, 2025; Centers for Disease Control, 2022). Areas with more health concerns may have higher demand for EMS and areas of higher social vulnerability may have greater need for services that support wellbeing and resilience, like parks.

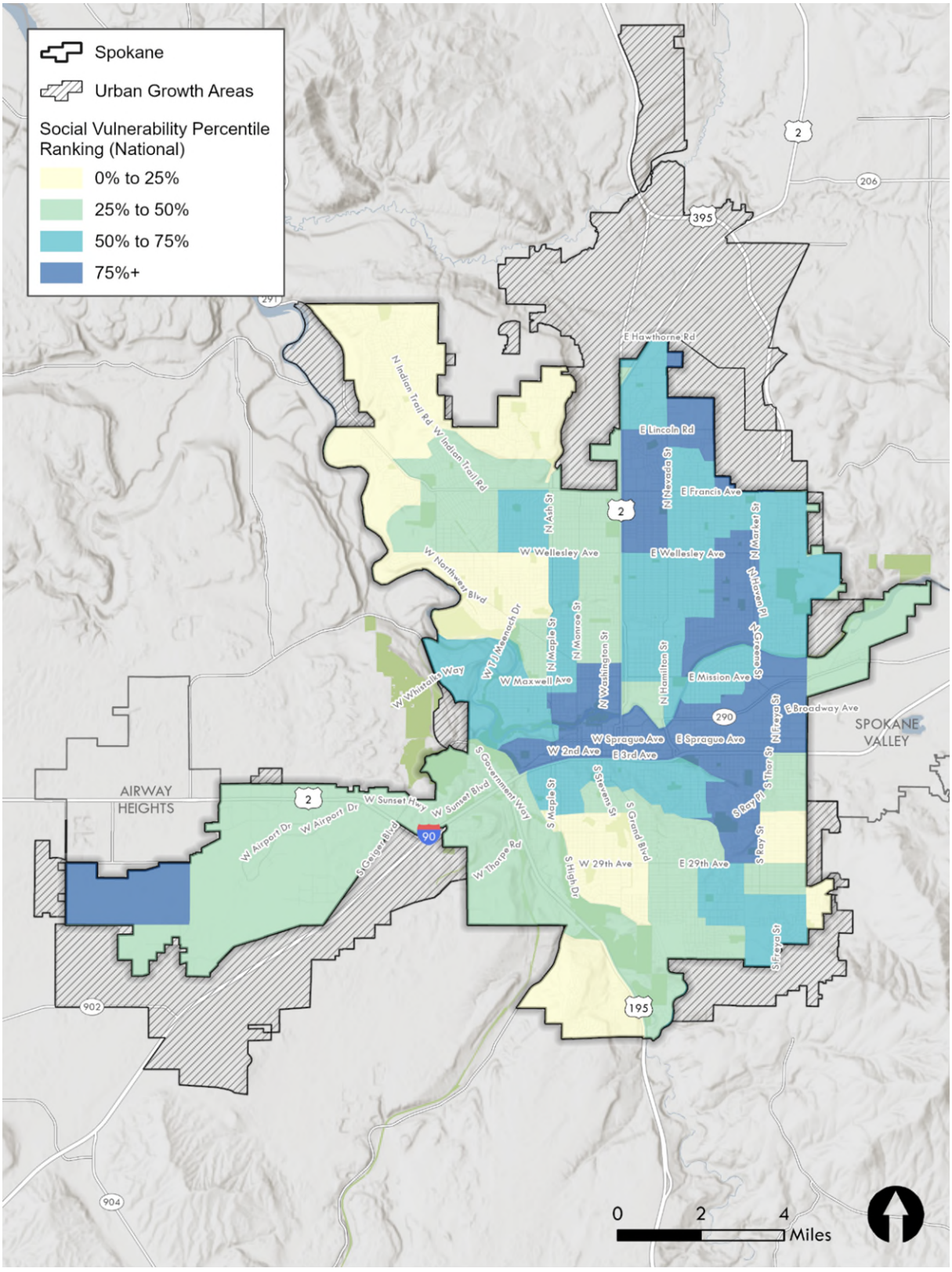
Exhibit 3.8-15 shows areas of the city with the highest rates of poor physical health and **Exhibit 3.8-16** shows areas of the city with the highest social vulnerability scores.

Exhibit 3.8-15. Poor Physical Health



Source: (Centers for Disease Control, 2025) (BERK, 2025)

Exhibit 3.8-16. Social Vulnerability Index



Source: (Centers for Disease Control, 2022)

Northwest Spokane

Northwest Spokane has some Census block groups with a high population with self-reported poor physical health. This includes areas around North Monroe Street and West Wellesley Avenue. Most of Northwest Spokane is not considered highly socially vulnerable, except for the Census tracts on the edge of Center City.

Northeast Spokane

Much of Northeast Spokane has a high percentage of residents with self-reported poor physical health, with the highest percentages around North Market Street and south of the Spokane River. Northeast Spokane also has several Census tracts that are considered high social vulnerability areas, including along North Market Street, North Nevada Street, East Lincoln Road, and south of the Spokane River.

Division Corridor

Much of the Division Corridor has a high percentage of residents with self-reported poor physical health, with the highest percentages around Center City. Areas of high social vulnerability are primarily to the north and south ends of the corridor.

Center City

Much of Center City has high percentages of residents with self-reported poor physical health. Social vulnerability is also generally high in this area.

South Spokane

While most of South Spokane does not have high rates of self-reported poor physical health, one area on the west side, following SR 195, does have high rates. There is one Census tract with high social vulnerability, along South Thor Street and South Roy Street towards I 90.

West Plains

West Plains does not have high rates of self-reported poor physical health or high social vulnerability.

3.8.2 Impacts

Impacts Common to All Alternatives

Environmental Impacts

Police

While the three alternatives vary in the location of future growth, all alternatives plan for between 25,157 and 50,650 new residents. The total number of jobs varies by alternative, with Alternative 3 planning for the highest number (38,848), Alternative 1 planning for the second highest (34,850), and Alternative 2 planning for the lowest (24,939).

To maintain the current ratio of 1.4 officers per 1,000 residents, SPD would need to hire between 36 and 72 new officers by 2046. This would equal between 3 and 6 new police officer positions per year over the 20-year period. Alternatives 1 and 3 may have additional impacts due to the higher number of jobs. Impacts from growth can be addressed through regular planning, staffing, and budgeting processes. For comparison, SPD hired 34 officers in 2023 alone, though this number also accounts for regular staff attrition. Additional evaluation may be needed to consider whether the current ratio of officers per 1,000 residents is adequate, based on SPD's reported capacity issues that persist even when all positions are filled.

Fire/EMS

All alternatives are expected to have similar impacts to fire and EMS services at the citywide scale because they all plan for the same amount of housing growth. To maintain the current ratio of 1.5 uniform staff per 1,000 residents, SFD would need to hire between 38 and 76 staff per year. Alternatives 1 and 3 may have additional impacts due to the higher number of jobs. Impacts from growth can be addressed through regular planning, staffing, and budgeting processes. For reference, 43 new firefighters were hired in 2023 and 2024, though this number also accounts for regular staff attrition.

Schools

Each alternative is expected to have varying impacts to each school district due to differences in growth distribution (**Exhibit 3.8-17**). Under Alternatives 2 and 3, Spokane School District is expected to add 488-505 more new students than under Alternative 1. In contrast, Alternative 1 would place more growth in the Mead School District, resulting in 549-600 more students than Alternatives 2 and 3.

Exhibit 3.8-17. Student Growth by School District

	Alternative 1		Alternative 2		Alternative 3	
District	Housing Growth	Student Growth	Housing Growth	Student Growth	Housing Growth	Student Growth
Spokane School District	19,074	5,229	20,914	5,734	20,852	5,717
Mead School District	1,406	637	79	36	193	88
Cheney School District	1,176	358	637	194	621	189

Source: (BERK, 2025).

Parks

All alternatives include the same overall population growth and are expected to have similar impacts to the park system on a citywide scale. The City will need to add new park acreage under all alternatives to maintain the levels of service described in the 2022 Parks and Natural Lands Master Plan. This includes 53-106 acres of regional parks, 33-67 acres of community parks, 31-62 acres of neighborhood parks, and 182-367 acres of natural lands (**Exhibit 3.8-18**).

Exhibit 3.8-18. Park Acreage Needs

Park Classification	Publicly Accessible Property Acres	Acres/1,000 Population in 2020 (223,600)	New Acres Needed (Low Growth) – All Alternatives	New Acres Needed (High Growth) – All Alternatives
Regional Park	474	2.1	53	106
Community Park	297	1.33	33	67
Neighborhood Park	274	1.23	31	62
Natural Lands	1,643	7.25	182	367

Source: (BERK, 2025)

Impacts on park gap areas vary by alternative and are addressed in the **Area Specific Evaluation** below.

Libraries

All alternatives plan for the same amount of growth and therefore are expected to have similar impacts on the citywide library system. See **Exhibit 3.8-19**. The current ratio of library square footage to population is 0.9, which exceeds the adopted level of service of 0.813 square feet for capita. Without additional square footage added to the system, the level of service in 2046 is expected to be 0.83 under a lower growth projection and 0.74 under a higher growth projection. Therefore, under lower growth, Spokane Public Library would exceed the adopted level of service without adding new square footage. However, under a high growth projection, the level of service would decline below the target. To maintain the target level of service, 20,240 square feet of library space would be needed by 2046. The event and learning space currently under development by Thrive International, as part of a mixed-income housing project, will add approximately 1,500 square feet.

Exhibit 3.8-19. Library Levels of Service

	Low Growth Level of Service – All Alternatives	High Growth Level of Service – All Alternatives
Level of service	0.83	0.74
Total square footage needed (0.813 s.f. per capita)	208,174	231,989
Additional square footage needed (in addition to existing 211,750 s.f.*)	0	20,240*

* Does not include Thrive International partnership space that is currently in development.
Source: (BERK, 2025)

Solid Waste

All alternatives plan for the same amount of housing unit and population growth. However, Alternatives 1 and 3 plan for greater job growth, which would result in a greater amount of commercial waste. Under the planned housing unit growth, to maintain the current ratio of staff to waste collections per month, the City would need to add 25 additional staff positions to meet residential waste increases. This equals an average of 1-2 positions per year. A total of 102,000-114,000 tons of solid waste from Spokane residents and businesses would be expected per year starting in 2046, using the County's estimate of 800 pounds per capita per year.

Environmental Justice Implications

All alternatives plan for growth in areas with existing social disparities. This may have impacts to public services by creating more demand for emergency services and parks in certain areas of Spokane. All three alternatives place between 31 and 34% of growth in areas with a high percentage of self-reported poor physical health, which may increase demand for emergency services where there is

already higher demand. See **Exhibit 3.8-20**. All alternatives also place between 23 and 27% of growth in areas with high social vulnerability. Greater growth in these areas may put more pressure on services like parks. Specific areas of growth are discussed below in **Area Specific Evaluation**.

Exhibit 3.8-20. Social Disparities and Housing Growth

	Alternative 1		Alternative 2		Alternative 3	
Existing Conditions	**Housing Growth**	**Percent of Growth**	**Housing Growth**	**Percent of Growth**	**Housing Growth**	**Percent of Growth**
High percentage of poor physical health	6,700	31%	7,100	33%	7,500	34%
High social vulnerability	5,000	23%	5,500	25%	6,000	27%

Source: (BERK, 2025) (Centers for Disease Control, 2022) (Centers for Disease Control, 2025)

Area Specific Evaluation

Northwest Spokane

All alternatives plan for some housing growth in Northwest Spokane, particularly near Center City and the Division Corridor as well as in the North Indian Trail neighborhood. Job growth is also generally near Center City as well as pockets of growth in the Northwest and North Indian Trail neighborhoods. These neighborhoods are therefore likely to see some increased demand for police, fire/EMS, solid waste, schools, parks, and libraries in all alternatives. Housing growth is also expected in park gap areas in all alternatives, including North Indian Trail, Balboa/South Indian Trail, and Northwest. In Alternative 1, this also includes Five Mile Prairie. Need and demand for new parks in these gap areas will therefore increase.

Across the alternatives, Northwest Spokane has minimal growth overlapping with areas of high rates of self-reported poor physical health and high rates of social vulnerability. Minimal environmental justice impacts are expected in relation to public services.

Northeast Spokane

Housing growth in Northeast Spokane across the alternatives is generally clustered around Center City and in parts of the Hillyard neighborhood, as well as along the Division Corridor especially in Alternatives 2 and 3. Job growth is generally near downtown, along the Division Corridor, and along East Francis Avenue, as well as in the Hillyard neighborhood. These neighborhoods are therefore likely to see some increased demand for police, fire/EMS, solid waste, schools, parks, and libraries in all

alternatives. Housing growth is also expected in park gap areas in all alternatives, including Shiloh Hills, Hillyard, parts of Bemiss, and parts of East Central. Need and demand for new parks in these gap areas will therefore increase.

Across the alternatives, Northeast Spokane has growth in areas with high rates of self-reported poor physical health, particularly on the northern side and especially for Alternatives 1 and 2. Northeast Spokane is also expected to see growth in areas with high rates of social vulnerability. Growth may result in higher demand for EMS and parks in these areas, which may already experience greater need than other areas of the city.

Division Corridor

All alternatives plan for some job and housing growth in the Division Corridor, especially in Alternatives 2 and 3. This area is therefore likely to see some increased demand for police, fire/EMS, solid waste, schools, parks, and libraries in all alternatives. This includes housing growth in the park gap areas in north Shiloh Hills and East Central. These areas are therefore expected to have an increased need and demand for new parks.

Under all alternatives, some growth is expected to occur in parts of the Division Corridor that have high rates of self-reported poor physical health and social vulnerability, particularly in Alternatives 2 and 3. Growth may result in higher demand for EMS and parks in these areas, which may already experience greater need than other areas of the city.

Center City

All alternatives plan for a substantial amount of job and housing growth in Center City, with the greatest growth planned under Alternative 3. Center City is therefore likely to see more demand for police, fire/EMS, solid waste, schools, parks, and libraries than other parts of the city in all alternatives. This includes housing growth in the park gap area in East Central, which is therefore expected to have an increased need and demand for new parks.

Under all alternatives, growth is expected in Center City, which has generally high rates of self-reported poor physical health and social vulnerability. Growth may result in higher demand for EMS and parks in these areas, which may already experience greater need than other areas of the city.

South Spokane

Some housing growth is planned for South Spokane in all alternatives, especially in the neighborhoods around Center City, along with parts of Lincoln Heights, Southgate, Grandview/Thorpe, and Latah/Hangman. These areas will likely experience greater demand on police, fire/EMS, solid waste, schools, parks, and libraries than other areas within South Spokane. This includes housing growth in the park gap areas in the East Central, Lincoln Heights, Rockwood, Comstock, Southgate, Latah, Grandview/Thorpe, and Browne's Addition neighborhoods. These areas are therefore expected to have an increased need and demand for new parks. Acquisition of land may also be more feasible in

these areas than others based on land availability, particularly natural lands in the Thorpe and Latah areas.

Across the alternatives, South Spokane has minimal growth overlapping with areas of high rates of self-reported poor physical health and high rates of social vulnerability. Minimal environmental justice impacts are expected in relation to public services.

West Plains

All alternatives plan for some job and housing growth in West Plains, with housing primarily planned towards the eastern edge and jobs planned throughout, with an emphasis on the area north of the airport. These areas will likely experience greater demand on police, fire/EMS, solid waste, schools, parks, and libraries than other areas within West Plains. The location of housing growth also overlaps with park gap areas. This area will therefore have increased need and demand for new parks.

West Plains does not have areas of particularly high rates of self-reported poor physical health and social vulnerability. Minimal environmental justice impacts are expected in relation to public services.

Alternative 1: No Action, Stay the Course

Police

Greater demand for police services may occur in Downtown and in centers and corridors, as this is where growth would be focused in Alternative 1. Alternative 1 plans for more job growth than Alternative 2, but less than Alternative 3, which could result in greater demand for police services.

Fire/EMS

Greater demand for fire and EMS services may occur in Downtown and in centers and corridors, as this is where growth would be focused in Alternative 1. This may result in more demand on fire stations throughout the City, especially those serving Downtown (1), West Plains (6), Hillyard (15), Shiloh Hills (18), and East Central (7, 8, and 14). Stations 1 and 18 already respond to a substantial percentage of citywide calls.

Alternative 1 plans for more job growth than Alternative 2, but less than Alternative 3, which could result in greater demand for fire/EMS services.

Schools

Alternative 1 would have the greatest impact on the Mead and Cheney School Districts and the least on Spokane School District among the alternatives, based on the location of growth. Based on housing growth, new school demand in Alternative 1 is likely to be Downtown and in centers and corridors.

Parks

Parks demand in Alternative 1 is expected to be highest in Center City and surrounding neighborhoods, North Indian Trail, Five Mile Prairie, Shiloh Hills, Hillyard, Grandview/Thorpe, Latah/Hangman, Lincoln Heights, Southgate, East Central, and the eastern part of West Hills. Almost all of these areas also have existing gaps in park access.

Libraries

Growth in Alternative 1 is focused in Downtown, and in centers and corridors, so greater library demand in these areas is expected though citywide demand is expected to be the same. This may especially affect the Central Library.

Solid Waste

Growth in Alternative 1 is focused in Downtown and in centers and corridors, so greater residential waste demand is expected in those areas though citywide demand is expected to be the same. Alternative 1 plans for more job growth than Alternative 2, but less than Alternative 3, which could result in greater demand for commercial solid waste.

Environmental Justice Implications

Alternative 1 includes some areas of growth that overlap with areas of self-reported poor physical health, including Center City and the north side of Northeast. These areas may have greater demand for EMS services. Center City and parts of Northeast also have growth areas overlapping with areas of high social vulnerability, which may indicate an increased need for parks.

Alternative 2: Distributed and Balanced

Police

Greater demand for police services may occur along frequent transit corridors, as this is where growth would be focused in Alternative 2 though citywide demand is expected to be the same. Alternative 2 plans for the least amount of jobs so would likely have lower overall demand than Alternatives 1 and 3.

Fire/EMS

Greater demand for fire and EMS may occur along frequent transit corridors, as this is where growth would be focused in Alternative 2 though citywide demand is expected to be the same. This may result in more distributed demand across the City, particularly at Stations 1, 2, 7, 8, 11, 13, 15 and 18. Stations 1 and 18 already take a high percentage of citywide calls. Alternative 2 plans for the least amount of jobs so would likely have lower overall demand than Alternatives 1 and 3.

Schools

Total demand for new schools is likely to be similar across alternatives, however Alternative 2, like Alternative 3, would have greater demand on the Spokane School District and less on the Mead and Cheney School Districts than Alternative 1. Based on housing growth, new school demand in Alternative 2 is likely to be along frequent transit corridors. New students would likely be distributed more across the city, in contrast to Alternative 3 where much of the student growth would happen in Downtown, West Plains, and Hillyard.

Parks

Parks demand in Alternative 2 is expected to be highest in Center City and surrounding neighborhoods, North Indian Trail, Hillyard, North Hill, Nevada Heights, Grandview/Thorpe, Latah/Hangman, Lincoln Heights, Southgate, and East Central. Many of these areas also have existing gaps in park access.

Libraries

Greater demand for libraries may occur along frequent transit corridors, as this is where growth would be focused in Alternative 2. This may distribute library demand more around the city, in contrast to Alternative 3 where much of the demand would likely affect the Central Library branch.

Solid Waste

Growth in Alternative 2 is focused along frequent transit corridors so greater residential waste demand is expected in those areas. Alternative 2 plans for the least amount of jobs so would likely have lower commercial demand than Alternatives 1 and 3. Under Alternatives 2 and 3, new LOS are also under consideration with the Capital Facilities Plan update and may change the number of collections to four per household per month for garbage, two for recycling, and four for organics.

Environmental Justice Implications

Alternative 2 includes some areas of growth that overlap with areas of poor physical health, including Center City, the north side of Northeast, and parts of the Division Corridor. These areas may have greater demand for EMS services. Center City and parts of Northeast also have growth areas overlapping with areas of high social vulnerability, which may indicate an increased need for parks.

Alternative 3: Center City and Regional Hubs

Police

Greater demand for police services may occur in Downtown and Regional Hubs like in West Plains and Hillyard, as this is where growth would be focused in Alternative 3. Alternative 3 plans for the greatest number of jobs so would likely have greater overall demand than Alternatives 1 and 2.

Fire/EMS

Greater demand for fire and EMS may occur in Downtown and Regional Hubs including in West Plains and Hillyard, as this is where growth would be focused in Alternative 3. This may result in more demand at Stations 1, 6, and 15. Station 1 already responds to 18% of citywide calls. Alternative 3 plans for the greatest number of jobs so would likely have greater overall demand than Alternatives 1 and 2. The additional intensities of jobs are expected in Center City to be focused on medical, educational, and R&D, whereas in West Plains and Hillyard more light and heavy industrial jobs are expected, which would require greater attention to fire and EMS activities including application of fire codes and regular inspections.

Schools

Total demand for new schools is likely to be similar across alternatives; however Alternative 3, like Alternative 2, would have greater demand on the Spokane School District and less on the Mead and Cheney School Districts than Alternative 1. Based on housing growth, new school demand in Alternative 3 is likely to be highest Downtown and in Regional Hubs like West Plains and Hillyard.

Parks

Parks demand in Alternative 3 is expected to be highest in Center City and surrounding neighborhoods, North Indian Trail, Hillyard, Shiloh Hills, North Hill, Nevada Heights, Grandview/Thorpe, Latah/Hangman, Lincoln Heights, Southgate, and East Central. Many of these areas also have existing gaps in park access.

Libraries

Greater demand for libraries may occur in Downtown and Regional Hubs such as West Plains and Hillyard, which would have both industrial jobs and mixed-use commercial as well as residential uses. With this growth pattern, there may be increased demand at the Central Library in particular, as well as Liberty Park Library

Solid Waste

Greater demand for solid waste services may occur in Downtown and Regional Hubs including West Plains and Hillyard, as this is where growth would be focused in Alternative 3. Alternative 3 plans for the greatest number of jobs so would likely have greater commercial waste demand than Alternatives 1 and 2. Under Alternatives 2 and 3, new LOS are also under consideration with the Capital Facilities Plan update and may change the number of collections to four per household per month for garbage, two for recycling, and four for organics.

Environmental Justice Implications

Alternative 3 includes some areas of growth that overlap with areas of self-reported poor physical health, including Center City and parts of the Division Corridor, to a greater extent than Alternative 2. These areas may have greater demand for EMS services. Center City and the north end of the Division Corridor also have growth areas overlapping with areas of high social vulnerability, which may indicate an increased need for parks.

3.8.3 Mitigation Measures

Incorporated Plan Features

- The adopted Comprehensive Plan includes a Capital Facilities and Utilities Element and a Parks and Recreation Element, which include policies that support planning for levels of service, operations, maintenance, funding, and capital projects for public services.
- The adopted Capital Facilities Plan includes level of service standards for police, fire/EMS, schools, and libraries.
- The adopted Parks and Natural Lands Master Plan includes levels of service and policies to support park development to meet current and future City needs.
- Alternatives 2 and 3 include a new Spokane Capital Facilities Plan, which updates the adopted plan to align with other providers' plans and current population numbers. An updated Capital Facilities Plan would ensure the most recent plans for future growth are considered in capital planning. New LOS for some types of capital facilities are also under consideration as part of this plan and would better take current conditions and observed deficiencies into account.
- Alternatives 2 and 3 include a new Climate Element, which includes goals and policies to support climate resiliency of City functions, including emergency services, like police, fire, and EMS, and parks. Policies will also support environmental health which may put less pressure on emergency services.

Regulations and Commitments

- An increase to local sales and use tax to support a Public Safety Tax for criminal justice and fire protection became effective April 1, 2025.
- Spokane County's 2021 Comprehensive Emergency Management Plan includes actions for preparedness, prevention, protection, mitigation, response, and recovery for a range of hazards that require emergency response.
- The Spokane Fire Department created a Strategic Positioning Plan in 2019, which included seven goals to continuously improve its services.
- The Spokane Municipal Code includes fire code (Chapter 17F.080) and wildland-urban interface code (Chapter 17F.110) for fire prevention and response, both of which are based on international standards.

- The 2025-2026 Spokane Police Department Strategic Plan identified six strategic priorities for the department.

Other Potential Mitigation Measures

- Impact fees for schools, parks, or fire could support increased staffing and capacity to address ongoing growth, if other funding streams are unable to match needs.
- The City could investigate opportunities for increased parks access such as a fee-in-lieu program or park land dedications in key locations.
- The City could explore partnership opportunities to support the development of educational and childcare spaces, or public-private partnerships to develop parks or acquire natural lands.

3.8.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts are expected as impacts to police, fire/EMS, schools, parks, and solid waste, including environmental justice-related impacts, can be managed through regular planning, staffing processes, and mitigation measures.

3.9 Utilities

This section identifies the policy and regulatory framework governing utility development, provision, and operations; existing utilities providers in Spokane; and the potential effects of the three alternatives being considered on the need for capital improvements.

Thresholds of significance utilized in this impact analysis include:

- Impacts would require major unplanned capital improvements within Avista's power service network.
- Impacts would require major unplanned capital improvements within the City's potable water system.
- Impacts would require major unplanned capital improvements within the City's sewer system.
- Impacts would require major unplanned capital improvements to prevent flooding at frequencies and durations beyond design expectations.

3.9.1 Affected Environment

The following existing utility providers in the City of Spokane were considered in this analysis:

- Power (Avista)
- Water system (City of Spokane)
- Sewer system (City of Spokane)
- Storm drainage system (City of Spokane)

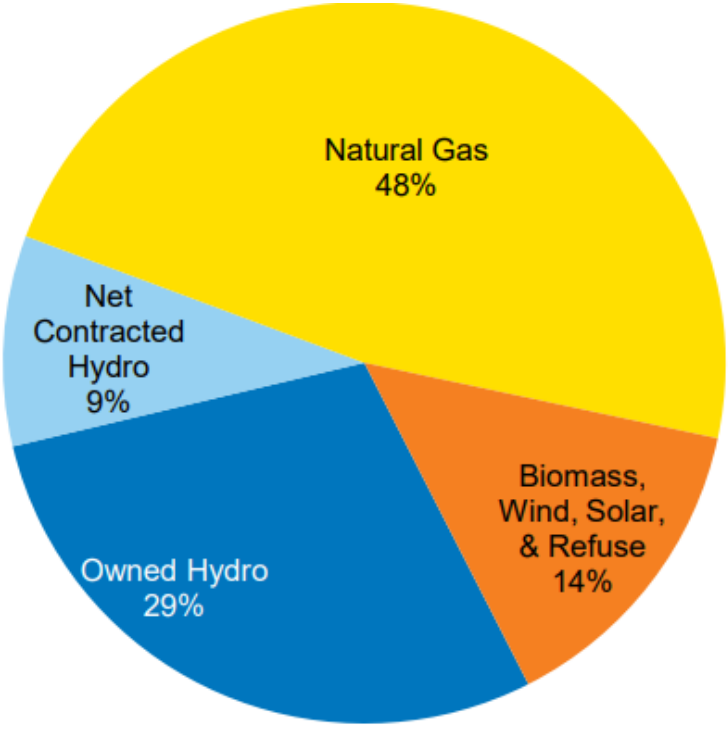
This section describes the elements of the existing utility systems as well as related natural, social, and economic environments that might be affected by the alternatives. This section provides a baseline by which changes that might be caused by the proposals can be measured against.

Power

Information about power relies primarily from Avista Corporation's 2025 Electric Integrated Resource Plan (2025 IRP).

Avista is an electrical and natural gas utility with a service area that spans much of the northwestern United States. Service to the City of Spokane area started in 1889 as Washington Water Power which changed to Avista in 1999 through an update to their corporate name. Avista provides electricity through natural gas generators as well as water, solar, and wind sources. The breakdown of the power generation sources is provided in **Exhibit 3.9-1**.

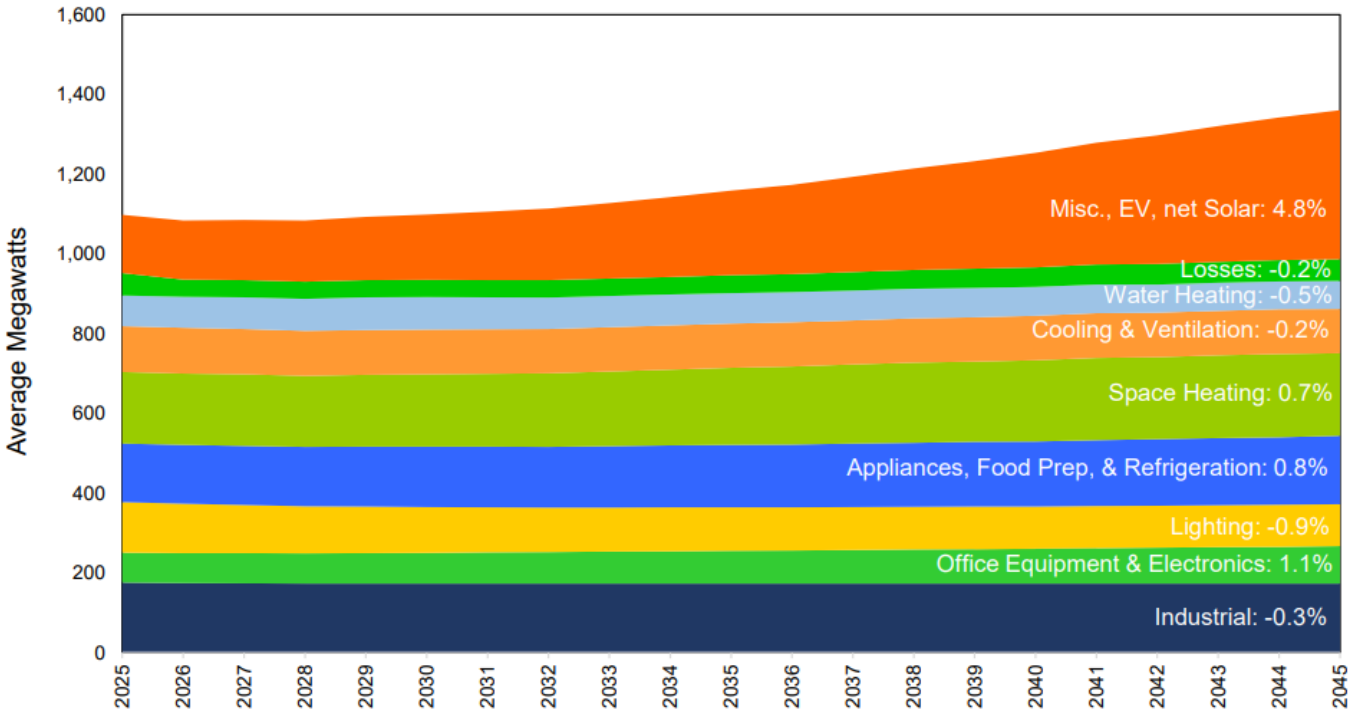
Exhibit 3.9-1. 2026 Generating Capability by Fuel Source



Source: Figure 2 - 2025 Avista IRP, 2025.

Avista prepared its 2025 IRP to address growth in their services over the next 20 years based on their own projections of a 0.91% increase of electricity consumption for the first 10 years and then a1.4% increase in consumption in the last 10 years, largely due to electrification of buildings and transportation. **Exhibit 3.9-2** shows the growth in energy use separated by end use from 2025 to 2045.

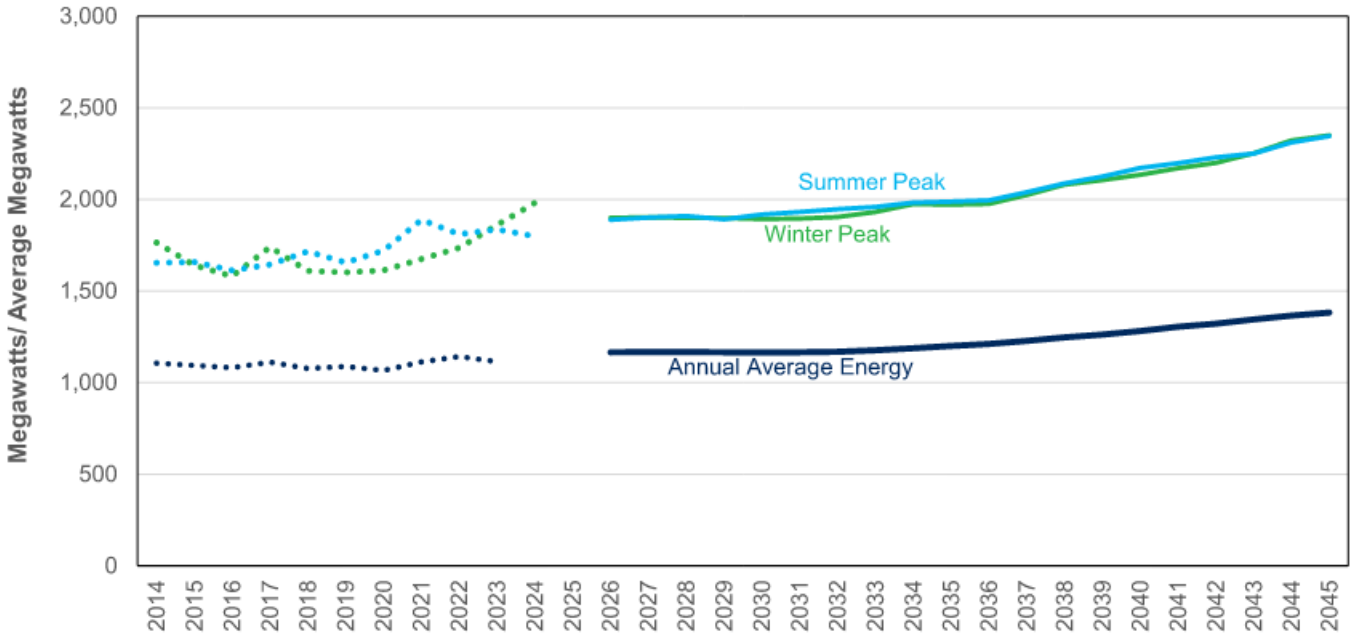
Exhibit 3.9-2. Change in Energy Use by End Use, 2025-2045



Source: Figure 3.11 – 2025 Avista Electric IRP, 2025.

Avista also records and forecasts their summer and winter peak loads as they tend to be representative of the largest loads on their system. These peaks are forecasted to grow at 1.14% and 1.12% for the summer and winter peaks respectively for the first 10 years with a significantly higher growth rate of 1.7% for the last 10 years. **Exhibit 3.9-3** is a graph of the annual average energy growth rate with the summer and winter peaks shown.

Exhibit 3.9-3. Customer Load Forecast



Source: Figure 1 - 2025 Avista Electric IRP, 2025.

Avista's power system has interplay between public and private infrastructure over the entire study area as it serves as the primary power source. Growth in any subarea and type of connection would result in a larger power demand on Avista's grid. Avista's Spokane-based power system interacts with the following study areas outlined below.

Northwest Spokane

Northwest Spokane has a varied landscape including high density residential as well as commercial, educational, and rural areas. Most of the area is dominated by single unit residential developments with smaller pockets of high intensity residential and commercial developments near the Division corridor. The western and northern sections of this area are more rural with lower intensity residential and forested areas. Avista operates 5 substations in the Northwest Spokane Subarea.

Northeast Spokane

Northeast Spokane is varied in its landscape with a larger area of industrial sites to the east and south and commercial developments along the Division corridor. The area also includes a large amount of single unit and high intensity residential areas. There are little to no rural areas as much of the area is developed. Avista operates 4 substations and a natural gas generator in the Northeast Spokane Subarea. Avista's IRP notes a plan to upgrade the Beacon Substation located near the intersection of Havana St. And Buckeye Ave.

Center City

The Center City area is the highest intensity area within Spokane including commercial, office, and high intensity residential areas. Many of the governmental entities reside within this area. Center City has little to no rural or forested areas. Avista has one substation and 4 hydroelectric facilities in this study area.

South Spokane

The South Spokane area is another varied area with areas of commercial as well as single unit and multi-unit residential areas. This area is more spread out and has large variations in elevation. The center of this area is where most of the commercial development is located (along 29th and Regal). The area is bounded on the west and south by more rural and forested areas. Avista operates 5 substations in this study area.

West Plains

The West Plains area is the most spread out area and also the area with the least development. Spokane International Airport is located in the center of this area. Much of the West Plains is covered by open space and industrial areas. Avista notes that the West Plains is a target of new improvements with the Blue-Bird – Garden Springs 230 kV project. Avista operates 4 substations in this study area. Avista's IRP identified the West Plains area as one where additional capacity would be required due to residential and industrial growth.

Water

Information in this section relies primarily on the 2023 City of Spokane Water System Plan (WSP).

The City of Spokane has owned and operated its public water system since the late 1800s. The water system includes 8 water producing well stations, 37 water storage reservoirs, 26 booster pump stations serving 25 pressure zones, and more than 1,100 miles of water pipelines. It serves more than 80,000 connections throughout the city.

The source water for the City's water system is the Spokane Valley-Rathdrum Prairie Aquifer (designated a sole source aquifer in 1978 by the EPA). The Aquifer is primarily recharged through surface runoff and surface waters in the region.

This analysis references the pressure zones for the water system as there is significant overlap between pressure zones in multiple study areas, and the Water System Plan is arranged to address each pressure zone. The City's Pressure Zones are provided in **Exhibit 3.9-4** and **Exhibit 3.9-5**. They are grouped by general area for the discussion later in this chapter.

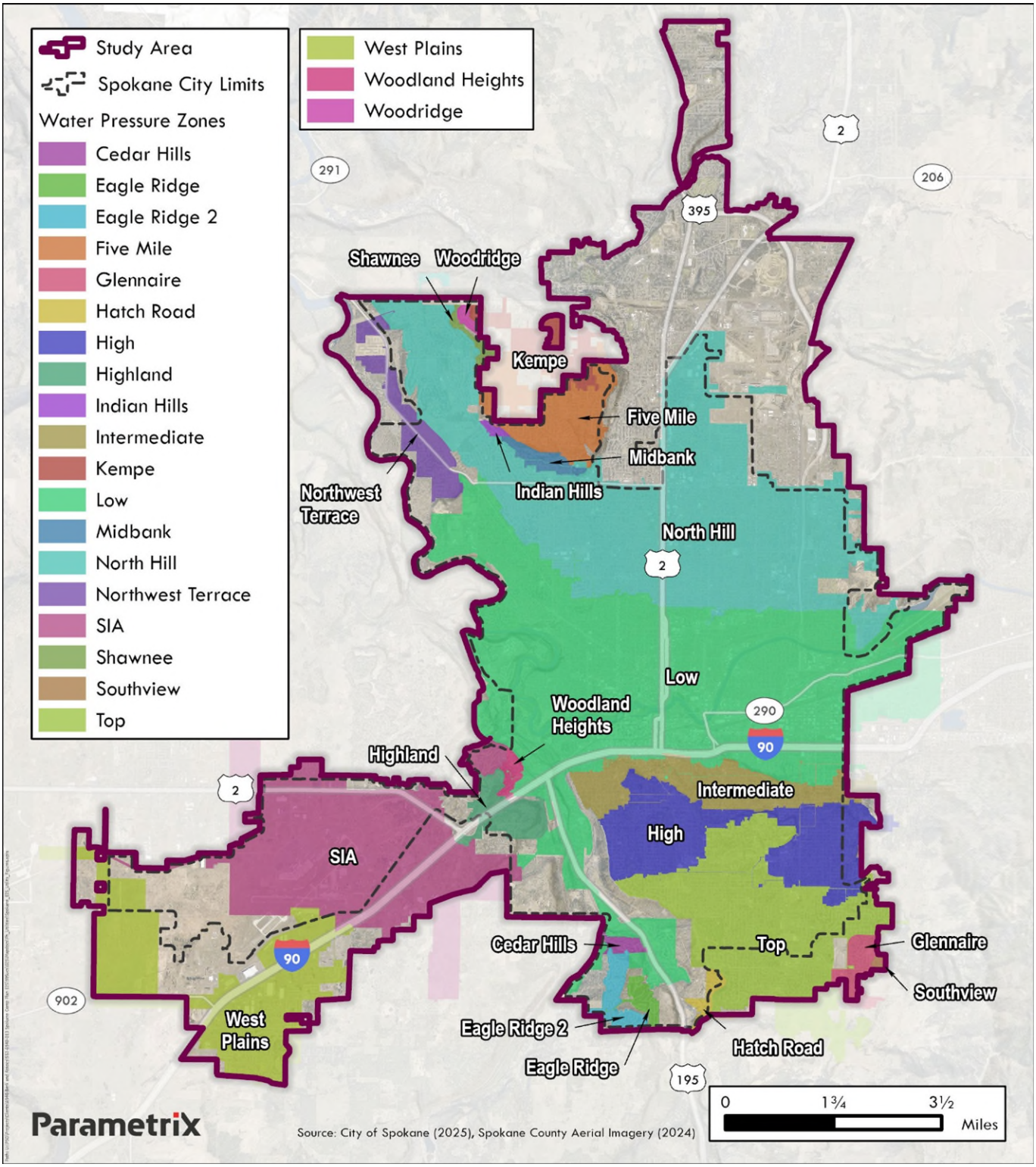
Exhibit 3.9-4. City of Spokane Water System Pressure Zones

Pressure Zone	Location
Cedar Hills	South Spokane: off Hwy 195 in the Latah Valley north of Eagle Ridge
Eagle Ridge	South Spokane: off Hwy 195 in the Latah Valley south of Eagle Ridge
Eagle Ridge 2	South Spokane: off Hwy 195 in the Latah Valley just west of Hatch Rd
Five Mile	Northwest Spokane: on top of Five Mile Prairie
Glennaire	South Hill Spokane: east of Glenrose on 57th
Hatch Road	South Hill Spokane: on Hatch Road Between Hwy 195 and 57th
High	South Hill Spokane: Manito and Lincoln Heights Neighborhoods
Highland	West Plains Area: around Highland Park
Indian Hills	Northwest Spokane: east of the Intersection of Indian Trail Rd and Barnes Rd
Intermediate	South Hill Spokane: south of Downtown between I90 and 14th.
Kempe	Northwest Spokane: on the 5 Mile Prairie north of Strong Rd
Low	Center Spokane: large low-lying area north of I90 and south of Garland Ave
Midbank	Northwest Spokane: southern hillside of the Five Mile Prairie
North Hill	North Spokane: large area spanning north of Garland to the City limits
Northwest Terrace	Northwest Spokane: development west of Hwy 291 north of Francis Ave
Shawnee	Northwest Spokane: east of Indian Trail Rd near Shawnee Ave
SIA	West Plains area: in and around the Spokane International Airport
Southview	Southeastern Spokane: east of Glennaire at the top of the hill
Top	South Hill Spokane: south of the High Zone extending outside of the city limits to the south.
West Plains	West Plains area: southwest of Spokane International Airport
Woodland Heights	West Plains area: area west of Hwy 195 and south of I90
Woodridge	Northwestern Spokane: at the northwestern end of Five Mile Prairie

Source: City of Spokane, September, 2023.

Exhibit 3.9-5 below shows the pressure zones over the study area.

Exhibit 3.9-5. Map of City of Spokane Water System Pressure Zones



Source: City of Spokane, July, 2025.

The WSP determined the initial water system demands shown in **Exhibit 3.9-6**. Water system demands are expressed in terms of Equivalent Residential Units (ERUs) which represent the average use of a single-unit residential dwelling within the pressure zone. Also shown in **Exhibit 3.9-6** is the Distribution System Leakage (DSL), which is the representation of the estimated water loss due to system leakage, also expressed as ERUs.

Exhibit 3.9-6. Equivalent Residential Unit (ERU) Flowrates by Pressure Zone

Pressure Zone	ERU (Count)	DSL ERU (Count)	Total ERU (Count)	ERU_{ADD} (gpd/unit)	ERU_{MDD} (gpd/unit)	ERU_{Winter} (gpd/unit)
Hatch Road	198	n/a	198	951	4,460	161
Southview	43	1	44	657	3,001	166
Woodridge	64	4	68	733	2,895	135
Glennaire	522	8	530	571	2,709	139
Shawnee	156	10	166	603	2,277	148
Eagle Ridge	459	3	462	501	2,157	132
Indian Hills	56	n/a	56	524	2,150	147
Five Mile	2,047	54	2,101	594	2,138	141
Woodland Heights	243	82	325	463	1,976	124
Kempe	885	28	913	529	1,970	123
Midbank	573	12	585	514	1,911	128
Cedar Hills	221	6	227	443	1,906	116
Highland	862	67	929	442	1,883	126
Eagle Ridge 2	915	25	940	455	1,821	120
Northwest Terrace	1,497	n/a	1,497	487	1,739	120
Top	11,811	1,181	12,992	509	1,718	127
SIA	5,840	31	5,871	419	1,661	132
West Plains	4,665	167	4,832	415	1,547	130
High	9,563	604	10,167	368	1,203	130
North Hill	39,531	2,104	41,635	347	1,032	120
Intermediate	8,757	1,073	9,830	303	838	107
Low	47,166	8,990	56,156	303	734	106
Total	136,074	14,450	150,524			

Source: Table 2.2 - City of Spokane 2023 Water System Plan, September, 2023.

Growth in each pressure zone was determined in the WSP through the Spokane Regional Transportation Council (SRTC) 2019 Land Use Update Summary Traffic Analysis Zones (TAZs) and associated demands were applied to forecast water demand to 2042. These growth rates were applied to each pressure zone based on the TAZ forecast which resulted in the growth shown in **Exhibit 3.9-7** . The annual growth in percent (%) between the plan year and 20-year projection is summarized in **Exhibit 3.9-8** as well.

Exhibit 3.9-7. 20-year Projected Number of Equivalent Residential Units per Pressure Zone

Pressure Zone	Number of ERU	ERU Growth Per Year (%)
Cedar Hills	475	5.46
Eagle Ridge	1,001	5.83
Eagle Ridge 2	1,665	3.86
Five Mile	3,095	2.37
Glennaire	530	0
Hatch Road	230	0.81
High	10,955	0.39
Highland	1,653	3.9
Indian Hills	56	0
Intermediate	11,874	1.04
Kempe	1,178	1.45
Low	62,948	0.60
Midbank	604	0.16
North Hill	46,540	0.59
Northwest Terrace	2,257	2.54
Shawnee	182	0.48
SIA	11,127	4.48
Southview	44	0
Top	14,955	0.76
West Plains	7,602	2.87
Woodland Heights	347	0.34
Woodridge	82	1.03
Uncategorized	828	N/A
Total	180,228	1.62

Source: Table 2.11 - City of Spokane Water System Plan, 2023.

The Water System Plan also classified the growth of different customer classes. **Exhibit** shows the growth of each customer class by pressure zone.

Exhibit 3.9-8. Growth Rate by Pressure Zone and Customer Class

Pressure Zone	LU1: Single Family Households	LU2: Multifamily Households	LU3: Hotel and Motel Rooms/Campsites	LU4: Ag./Forestry/Mining /Industry/Manufact	LU5: Retail Trade (non-CBD)	LU6: Services and Offices	LU7: FIRES	LU8: Medical	LU9: Retail Trade (CBD)	LU10: College and Commuter Students	LU11:Education (K-12)	LU12: Education (College and University)
Cedar Hills	196	0	0	0	5	0	1	2	0	0	10	0
Eagle Ridge	304	0	0	0	9	0	1	2	0	0	16	0
Eagle Ridge 2	402	0	0	0	11	1	2	3	0	0	21	0
Five Mile	743	31	0	0	40	39	5	37	0	0	17	0
Glennaire	6	1	0	0	0	2	0	1	0	0	3	0
Hatch Road	23	0	0	0	0	0	0	0	0	0	0	0
High	437	100	0	1	52	77	30	492	0	3	196	3
Highland	262	757	99	6	45	19	0	0	0	0	0	0
Indian Hills	3	0	0	0	5	7	1	10	0	0	0	0
Intermediate	234	199	163	1	89	98	10	2,236	0	0	77	2
Kempe	191	0	0	0	12	4	0	1	0	0	37	0
Low	1,592	2,517	399	830	839	2,728	138	3,791	61	3,950	617	1,178
Midbank	0	0	0	0	21	19	2	7	0	0	0	0
North Hill	2,136	922	125	184	1,100	2,197	723	2,307	0	115	434	8
Northwest Terrace	459	335	0	0	0	86	0	0	0	0	0	0
Shawnee	15	0	0	0	7	10	2	15	0	0	0	0
SIA	711	1,600	243	4,285	2,039	922	89	572	0	86	42	0
Southview	0	0	0	0	0	0	0	0	0	0	0	0
Top	760	748	0	5	1,035	197	30	717	0	5	134	1
West Plains	1,070	281	36	1,494	1,073	34	0	0	0	0	2	0
Woodland Heights	3	23	31	2	35	6	0	12	0	0	0	0
Woodridge	6	0	0	0	1	0	0	0	0	0	8	0
TOTAL	**9,553**	**7,514**	**1,096**	**6,808**	**6,418**	**6,446**	**1,034**	**10,205**	**61**	**4,159**	**1,614**	**1,192**

Source: City of Spokane Water System Plan, 2023.

The following sections outline the characteristics of each group of water pressure zones. The groups of pressure zones were selected based on their geographic area with some consideration of the study areas, but as noted previously they have significant overlap between different study areas in many cases.

Cedar Hills, Eagle Ridge 1 & 2, and Hatch Pressure Zones

The Cedar Hills, Eagle Ridge 1&2, and Hatch pressure zones are in the South Spokane study subarea and are generally characterized by large suburban developments. The Water System Plan (WSP) shows almost all the growth for this zone is to support single unit household customers with limited commercial growth. The WSP includes projects that address growth in the zone with the planned addition of a new booster pump station and reservoir within the Eagle Ridge pressure zone as well as associated transmission mains.

High, Top, Glennaire, and Southview Pressure Zones

The High, Top, Glennaire, and Southview pressure zones are located in the South Spokane study subarea, extending beyond the city limits and span a wide range of elevations. The WSP shows growth in this zone to support single unit, multi-unit, and commercial uses. The WSP includes projects that upgrade booster stations to address additional flowrate needs to keep up with growth, replacements, and maintenance for reservoirs that are nearing the end of their service life.

Low and Intermediate Pressure Zones

The Low and Intermediate pressure zones cover areas in the Center City, Northeast, and Northwest study subareas and extend north to near Garland Ave and Northwest Blvd. Most of the City's production wells are in the Low and Intermediate pressure zones. The WSP shows growth in all categories but includes higher growth levels to support medical and educational uses. The WSP includes projects that increase well production and pump station capacity, replace pump stations nearing the end of their service life, increase transmission main capacity, and install new reservoirs to increase storage capacity.

North Hill, Northwest Terrace, Midbank, Indian Hills, Five Mile, Kempe, Shawnee, and Woodridge Pressure Zones

The North Hill, Northwest Terrace, Midbank, Indian Hills, Five Mile, Kempe, Shawnee and Woodridge pressure zones are in the Center City, Northeast, and Northwest study subareas in the northern third of the city and extend over a wide range of elevations and around isolated hillsides. The WSP shows growth for all customer classes but has higher growth for single and multi-unit housing, commercial, and medical uses. The WSP includes projects that increase well production and pump station capacity, replace pump stations nearing the end of their service life, increase transmission main capacity, and install new reservoirs to increase storage capacity.

West Plains, SIA, Highland, and Woodland Heights Pressure Zones

The West Plains, SIA, Highland, and Woodland pressure zones are within the West Plains and South Spokane study subareas and cover the area west of downtown including the Spokane International Airport and the West Plains. The WSP shows growth for all customer classes except medical and educational. The WSP includes projects that increase pump station capacity, replace pump stations nearing the end of their service life, increase transmission main capacity, and install new reservoirs to increase storage capacity.

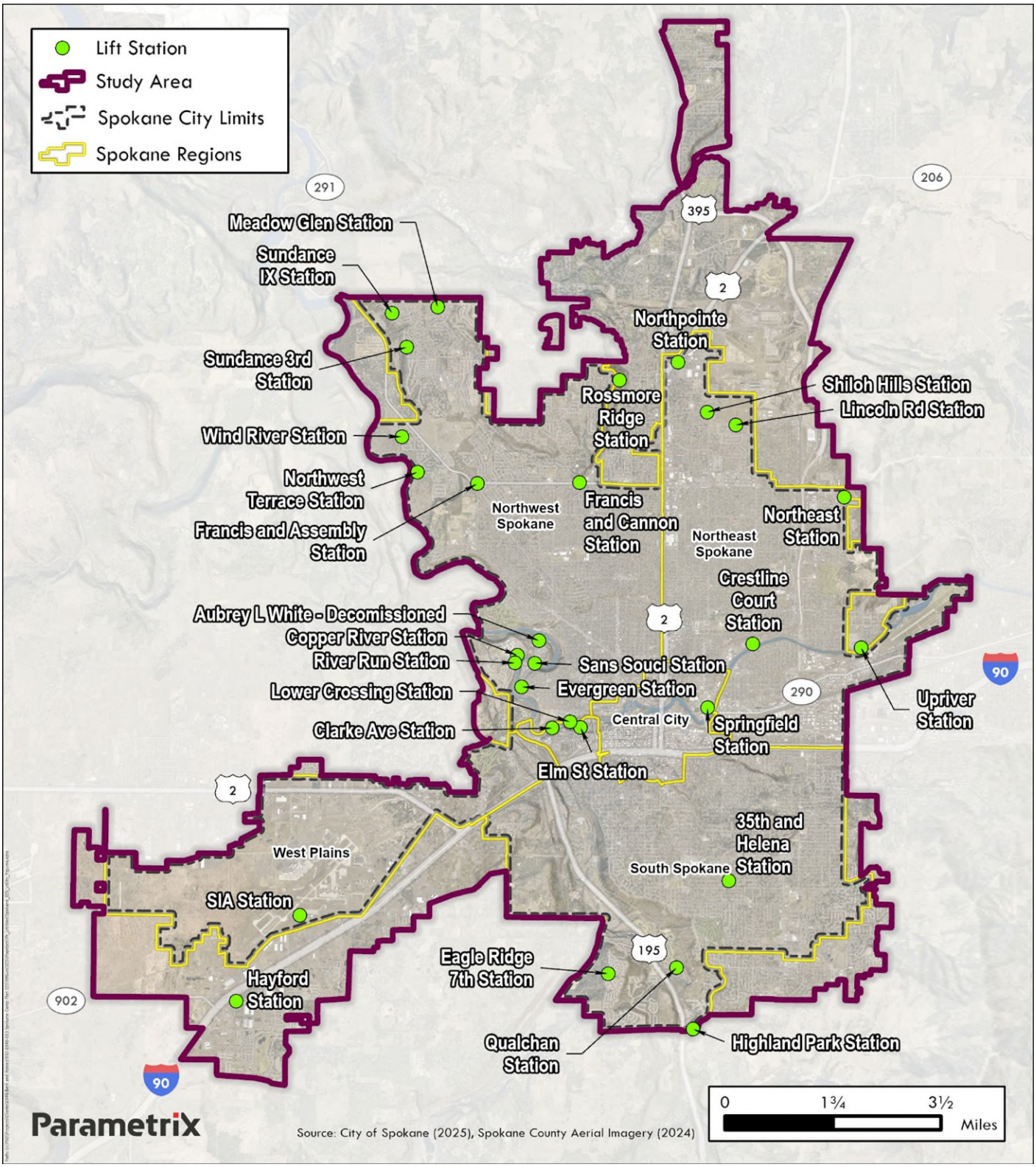
Wastewater

Information from this section is based on the City of Spokane's Integrated Clean Water Plan (ICWP) from 2014.

The City owns and maintains a wastewater system that comprises nearly 900 miles of sewer lines. There are several areas within the City's sanitary sewer system which are combined with stormwater, but those areas have interceptors and combined sewer overflow tanks which provide temporary storage during large rain events. The City also owns and operates the Riverside Park Wastewater Reclamation Facility (RPWRF), which collects and treats all the wastewater in the City's sanitary sewer system.

Sewer basins are usually split between those that drain via gravity and those that drain via a pumped system. Pumped systems are inherently more restrictive than gravity systems and thus will be more susceptible to issues brought about due to increases in unplanned flowrates. For this reason, this analysis focuses on basins that drain via pumped systems over the capacity of gravity sewer mains. The other consideration is the connection between the City's stormwater and sanitary sewer systems via the Combined Sewer Overflow (CSO) network. The discussion on the CSO network is provided in the Stormwater section later in this chapter. **Exhibit 3.9-9** below shows the locations of the City's wastewater pump stations from the 2023 Wastewater Lift Stations Conditions Assessment completed by Parametrix, Inc.

Exhibit 3.9-9. Map of Sanitary Sewer Pump Stations In Spokane



Northwest Spokane

The sanitary sewer system in Northwest Spokane flows to the RPWRF generally southeasterly via gravity except for several isolated areas which flow to a regional pump station first. The pump stations located in this region are shown below in **Exhibit 3.9-10**. There are a few other limiting pipelines within this study area, including the siphon crossing of the Spokane River near TJ Meenach Way and the siphon that crosses the Northside Landfill just south of the Indian Trail area. The RPWRF is also located in this area, and per the ICWP, it was planned for treatment of 50 million gallons per day (mgd) through a membrane facility, which was completed between the preparation of the plan in 2014 and this document. The ICWP envisioned possible future expansion to handle 85 mgd. The City has recently begun the facility planning process for the RPWRF to look at the 20-year horizon and beyond. This process will evaluate the need for further expansion.

Exhibit 3.9-10. Sanitary Sewer Pump Stations In Northwest Spokane

Station Name
Northwest Terrace
River Run
Sans Souci
Sundance 3rd Addition
Sundance IX Addition
Meadow Glen
Evergreen
Rossmoor Ridge
Copper River
Francis & Assembly
Francis & Cannon
Lower Crossing
Aubrey L. White (Decommissioned)
Wind River

Source: City of Spokane, 2023.

Northeast Spokane

The sanitary sewer system in Northeast Spokane flows southwesterly towards the RPWRF, but due to several isolated areas, there are several regional pump stations that are used to link to larger gravity mains. The Upriver pump station captures several services from Spokane County and pumps them westerly. The Northpointe and Lincoln pump stations capture the large area north of Francis Ave and East of Division St and pump south to a trunk line that links up with the rest of the northeastern system before heading to the RPWRF. Other limiting pipes within the Northeast area are siphons that cross the Spokane River near Regal St and Boone Ave. This area also receives flows from a portion of the Spokane County sewer system that cannot easily be routed to the Spokane County Wastewater Treatment Plant. This flow comes from the Marion Hay pump station which outlets into the Francis and Cannon Station.

Exhibit 3.9-11. Sanitary Sewer Pump Stations In Northeast Spokane

Station Name
Upriver
Lincoln Rd
Shiloh Hills
Crestline
Northpointe

Source: City of Spokane, 2023.

Center City

The sanitary sewer system in Center City flows northwesterly towards the RPWRF. This area has the fewest pump stations but is the most densely populated. There are a few critical pipelines that cross bridges in this area which convey flow from much of the South Hill, most notably the 60-inch trunk line that crosses the Post Street Bridge.

Exhibit 3.9-12. Sanitary Sewer Pump Stations In Central Spokane

Station Name
Springfield

Source: City of Spokane, 2023.

South Spokane

The sanitary sewer system in the southern portion of Spokane flows northerly towards the RPWRF. Flows from this region cross the Spokane River in one of only two locations, either through the Clarke Ave pump station or across the 60-inch trunk line under the Post Street Bridge. Clarke Ave is the City's largest pump station and it conveys most of the west half of the South Hill as well as all of the West Plains area. The remaining pump stations serve several smaller isolated areas.

Exhibit 3.9-13. Sanitary Sewer Pump Stations In South Spokane

Station Name
Eagle Ridge
Clarke Ave
Qualchan
35th and Helena
Highland Park
Elm Street

Source: City of Spokane, 2023.

West Plains

The West Plains sanitary sewer system flows northeasterly towards the Clarke Ave pump station, where it crosses the Spokane River towards the RPWRF. This area also crosses Latah Creek near High Bridge Park. Also included in this sewage basin is the Fairchild Airforce Base as well as the Spokane International Airport. The Hayford pump station in this area receives mainly industrial flows from the surrounding area.

Exhibit 3.9-14. Sanitary Sewer Pump Stations In the West Plains

Station Name
Hayford
SIA

Sources: City of Spokane, 2023

Stormwater

Information in this section refers primarily to the City of Spokane's Integrated Clean Water Plan from 2014, and the Stormwater Management Program Plan from 2025. For information regarding surface waters, refer to **Section 3.1 Earth, Water Quality, and Water Resources**.

The City manages a stormwater system mainly focused on collecting, treating, and infiltrating stormwater within the right of way of city streets. There are several areas where the stormwater and sanitary sewer systems are combined. These areas are typically older neighborhoods closer to the city center or in the South Spokane or Center City subareas. In areas where there are combined sewers, interceptors and combined sewer overflow tanks provide temporary storage of peak rainfall events to help prevent overloads at the treatment plant. There are also outfalls to the Spokane River in the event of extreme events to prevent flooding.

The City identified Drainage Concern Areas (DCAs), shown in **Exhibit 3.9-15** to address specific localized issues with infiltration, high groundwater, and shallow bedrock, which limit available options to manage and disperse stormwater.

This section discusses the plans for capital improvement projects related to the CSO system within each DCA and identifies inconsistencies between the plans for the CSO and stormwater system that could result in flooding, sewer outfall events, or damage to infrastructure. A map of the CSO basins is provided in **Exhibit 3.9-16** and **Chapter 5 Appendix D**. Further explanation of each study area and the relevant DCA and CSO basins is provided later in this section.

Exhibit 3.9-15. Drainage Concern Areas

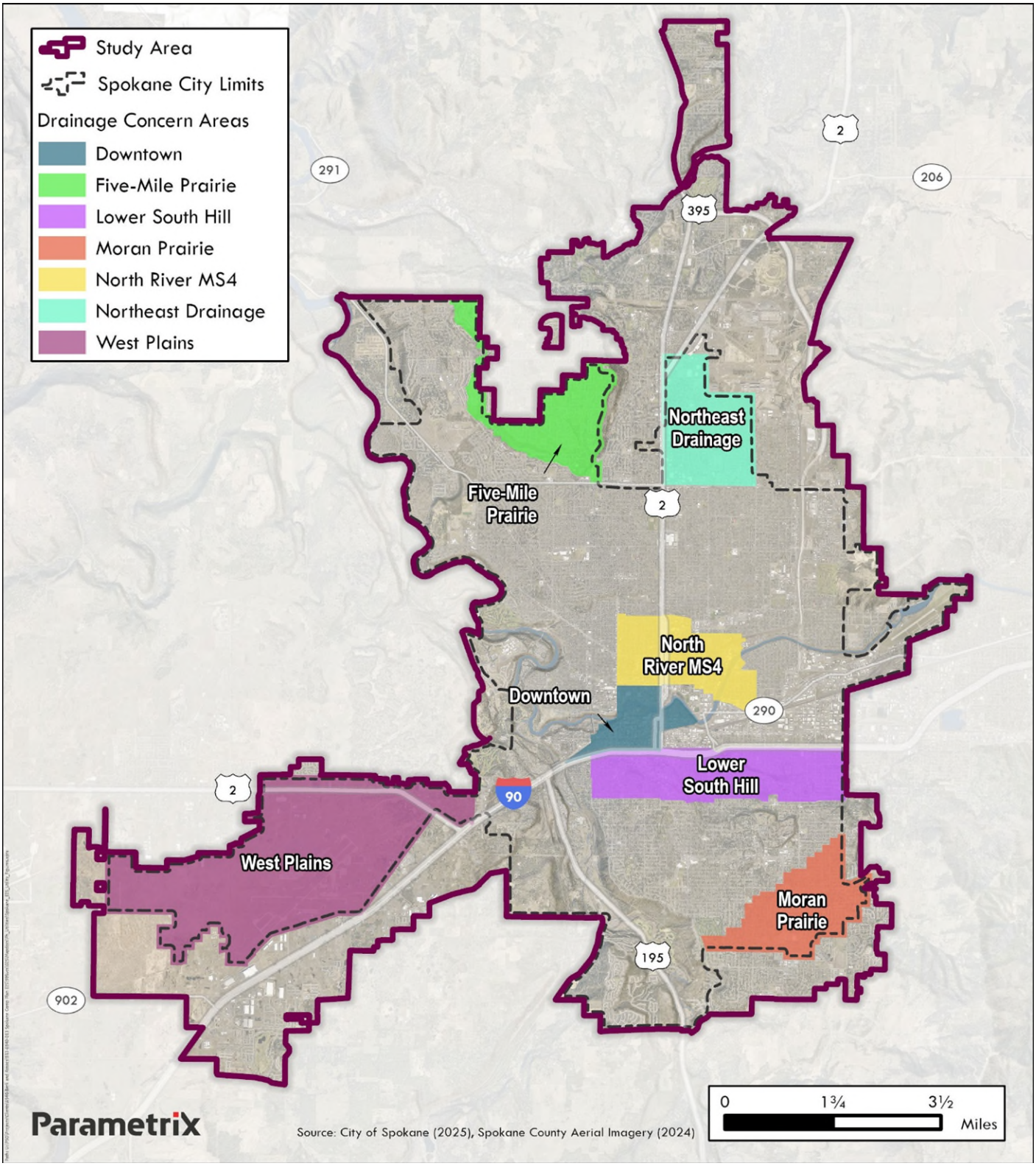
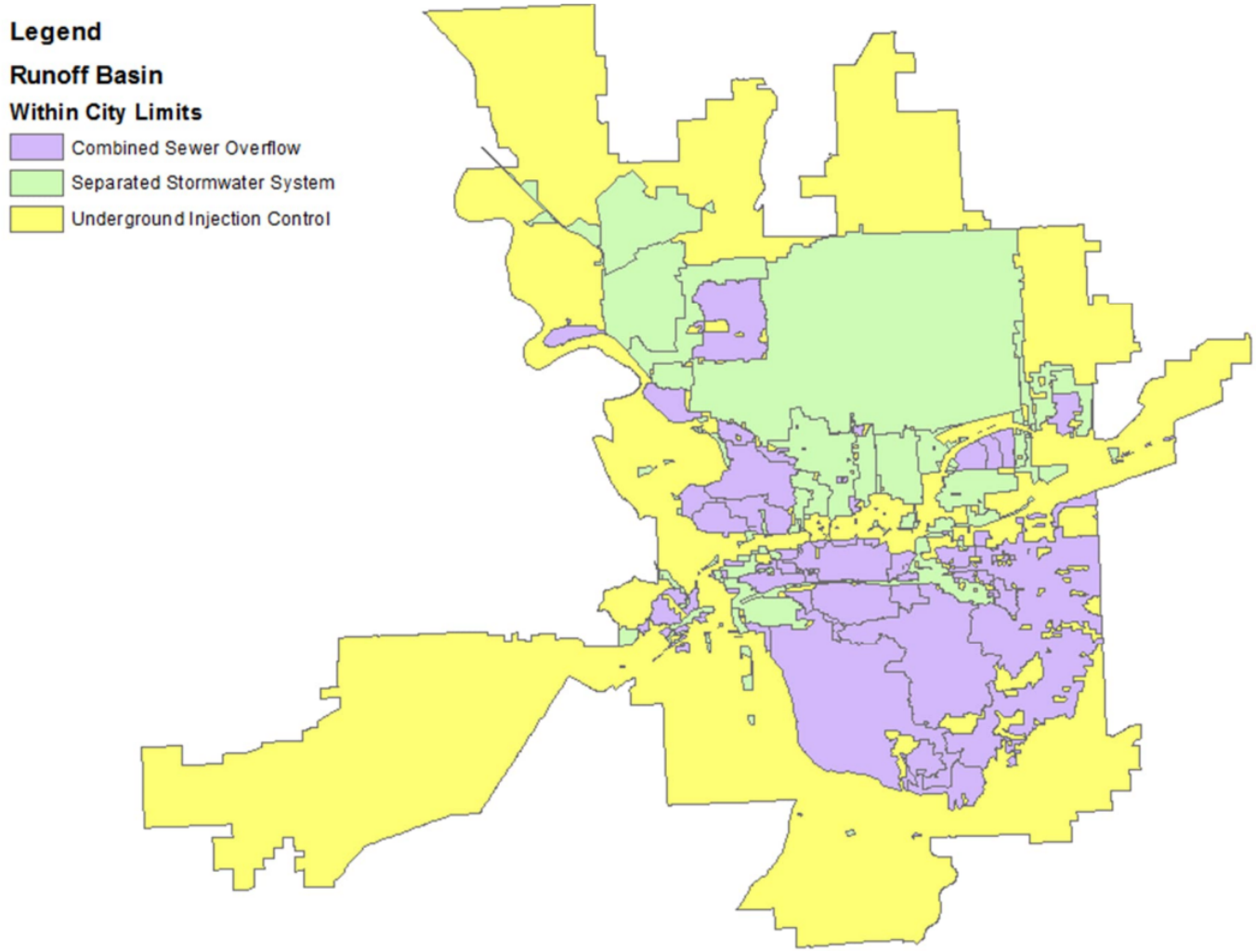


Exhibit 3.9-16. Map of CSO/Storm/UIC Areas



Source: CSO Annual Report, City of Spokane, 2024.

Northwest Spokane

Within Northwest Spokane, the Five Mile Prairie, and North River MS4 are the two DCAs of note. In the Five Mile Prairie, there are large areas of poorly draining soils, shallow bedrock, and high groundwater. It is also at a significantly higher elevation than the surrounding area. North River MS4 has areas of shallow bedrock and groundwater. The CSO basins in northwestern Spokane are 02, 06, 07, 10, 12, 14, 15, and 23, which are mostly located adjacent to the Spokane River except for CSO 06 (**Chapter 5 Appendix D**). CSO 06 serves an area where the stormwater system has not been separated from the sewer system. The ICWP (Table 4-1) identified a need for additional storage and infiltration capacity within all CSO basins within this area except for CSO 02.

Northeast Spokane

Within Northeast Spokane the Northeast Drainage and North River MS4 are the two DCAs of note. The Northeast Drainage DCI has areas of poorly draining soils. North River MS4 has areas of shallow bedrock and groundwater. The CSO basins in Northwestern Spokane are 38, 39, 40, 41 and 42 which are all adjacent to the Spokane River. The ICWP identified a need to adjust the regulator setting at CSO 41.

Center City

Within Center City the Downtown DCA was established due to shallow bedrock and limited areas for treatment and disposal due to the amount of development. The CSO basins in Center City are 23, 25, 26, 24B, and 33 C and D. The ICWP did not identify any specific projects for this area.

South Spokane

The South Hill and South Spokane area includes the Lower South Hill and Moran Prairie DCIs. The Lower South Hill DCA has limited combined sewer pipe capacity. The Moran Prairie DCA has shallow groundwater and bedrock. The CSO basins in South Spokane are 19, 20, 24 A and B, 26, 33 A and B, and 34. The ICWP Identified needs to increase storage at CSO 24, 26, 33 and 34. The South Hill area also includes the only stormwater specific pump station that the City operates, at 35th Ave and Helena St.

West Plains

Within the West Plains area the West Plains DCA was established due to shallow bedrock and groundwater and poorly draining soils. The only CSO basin in the West Plains area is 16. The ICWP did not identify any specific projects for this area.

3.9.2 Impacts

Impacts Common to All Alternatives

Each alternative will see growth throughout the study area which will require planning and adjustment of capital improvement projects to address changes in utility demands. The City departments and Avista should plan to align the scheduling of projects to those areas where growth is anticipated to avoid any mismatches between their planned improvement projects and the chosen alternative impacts which could result in the need for additional improvements. Special consideration should be given to key infrastructure for the following utilities:

Power

- Substations
- Generators (gas, solar, hydroelectric, wind)

Water

- Wells
- Pump Stations
- Reservoirs

Sewer

- Pump Stations
- Water Reclamation Facilities
- Siphons

Stormwater

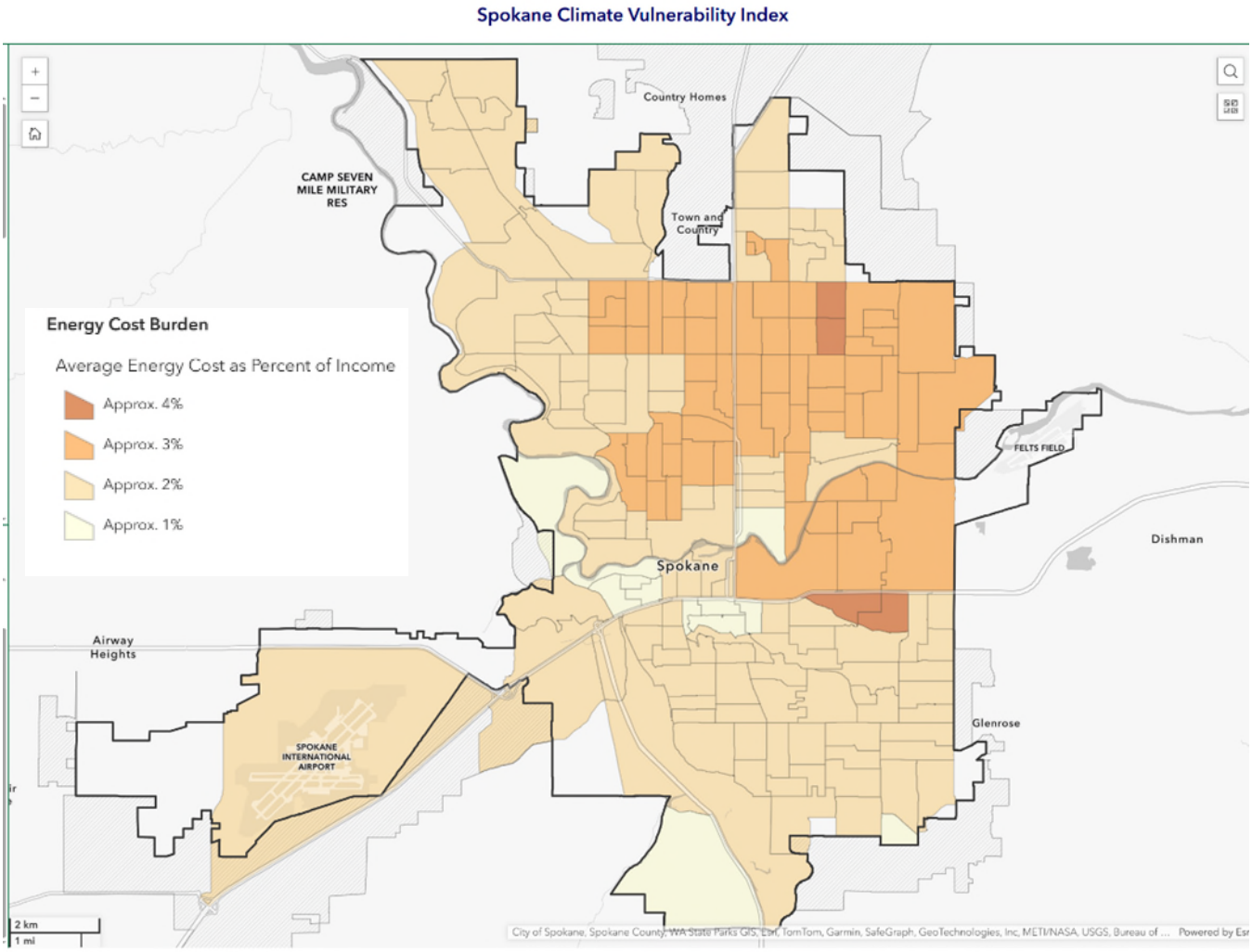
- CSOs
- Pump Stations
- Infiltration Facilities

Environmental Justice Considerations

Lower-income households may spend more of their income on energy expenses, and may live in poorly insulated housing which can result in higher energy demand. Costs to install more resilient forms of energy may be a barrier.

A household with 6% or greater energy burden is considered to be a high energy burden household. Energy cost burdens vary in Spokane with greater energy costs in Northeast Spokane and the East Central portion of South Spokane, and parts of Northwest Spokane typically along Division Corridor, though the areas overall do not reach 6%. See **Exhibit 3.9-17**.

Exhibit 3.9-17. Percent of gross household income spent on energy



Calculated by dividing the average housing energy cost by the average annual household income.
Source: (US Department of Energy, 2025)

Growth in areas with high risk and vulnerability to a changing climate such as in areas subject to flooding or urban flooding may require a greater degree of investment in improved drainage to overcome these vulnerabilities as described in the City of Spokane Climate Risk and Vulnerability Assessment, June 2025. Within the Center City area there is significant crossover between the high-susceptibility climate vulnerability index and the Downtown DCA. The Center City area should be considered for additional funding for storage and disposal to help mitigate flooding risk.

Alternative 1: No Action, Stay the Course

Power

Alternative 1 is consistent with Avista's forecasting as the utility has a plan to address growth along the current trajectory. Avista's planned growth rates in power demand are within the range shown in **Exhibit** , with Avista's growth at a combined 1.15% (0.91% for the first 10 years and 1.4% for the next 10 years) landing within the Moderate-High projection.

Water

Alternative 1 differs from the projections in the City's WSP (2042 horizon) based on the new projections in the updated SRTC TAZ data (SRTC up to 2050, adjusted in this EIS for 2046). While there will be an increase in water demand, the City has a plan to address needs as the system expands, which will need to be compared to the growth targets between the two projections. This alternative does have the largest growth in the single unit housing, which typically creates larger water usage peaks for irrigation in the irrigable months (April through October). Even so, the City's water system would be able to serve that projected growth.

Wastewater

There are plans in the ICWP to expand treatment capacity at the RPWRF. The difference in sewer usage between single unit and multi-unit connection depends on the density of the development; more dense clusters of single unit and multi-unit developments will see larger flows. While there will be an increase in sewer demand, the City has a plan to address needs as the system expands in Alternative 1 since it lines up with their existing plan.

Stormwater

There are plans in the ICWP to upgrade the CSO system. The City may need to develop a strategy to address or mitigate the drainage issues in each of the DCIs. There will be an increase in stormwater flows, but the City has a plan to address needs as the system expands in Alternative 1 since it lines up with their existing plan.

Alternative 2: Distributed and Balanced

Power

Alternative 2 would concentrate much of the growth around transit routes and increase mixed-use and multi-unit growth throughout the city. From a power distribution standpoint, if there are more concentrated users, this should increase the efficiency of the power network and reduce total usage. This may result in the need to upgrade existing infrastructure to address growth in the areas surrounding the transit routes.

Water

Similar to the impacts noted in the Power section, concentrating growth along corridors under Alternative 2 would be a net benefit to a water system. However, as WSP assumptions do not show the same level of growth around the Wellesley and Francis Corridors, the City may need to upgrade existing infrastructure or construct new infrastructure to support growth in those areas.

Alternative 2 increases the mixed-use and housing density along Northwest Blvd, Francis Ave, and Wellesley Ave, which could increase the need for production in the Low and North Hill pressure zones which only showed an increase of 0.60% and 0.59%, respectively. Since the production wells are predominantly in this zone, the production capacity may need to be expanded in these zones.

As with water production there is also a potential mismatch between the storage capacity in the Low and North Hill pressure zones between Alternatives 1 and 2. As noted above, there may be additional storage needs in the areas surrounding Northwest Blvd, Francis Ave, and Wellesley Ave.

Wastewater

Concentrating growth along corridors may be a net benefit to a utility, but the plan for growth should be compared to where limiting infrastructure is located, such as siphons, pump stations, and the water reclamation facility. With growth in Alternative 2 increasing along the Northwest Blvd, Francis Ave, and Wellesley Ave corridors, as well as in the West Plains, this could result in the need to expand capacity at the Francis and Cannon and Clarke Ave pump stations as well as the Latah Creek Siphon.

Stormwater

Alternative 2 converts much of the growth into mixed-use and multi-unit developments which could reduce the stormwater generated overall. There are a few DCIs which the growth either happens adjacent to or near, but all of them are already developed, and the planned development is not likely to increase the stormwater generated so long as the City maintains their existing stormwater mitigation standards for both private and public developments.

Alternative 3: Center City and Regional Hubs

Power

Alternative 3 would concentrate much of the growth in the downtown area and increase the mixed-use and multi-unit growth throughout the city. From a power distribution standpoint, if there are more concentrated users, this should increase the efficiency of the power network and reduce total usage. This higher concentration in these central areas may require additional generation or transmission capacity.

Water

Similar to the impacts noted above in the Power section, concentrating growth in a central area is a net benefit to a water system. However, this concentrated growth may require expansion of transmission, production, and storage in the Low, North Hill, Intermediate, High, and Top Pressure zones.

Wastewater

Concentrating growth along corridors may be a net benefit to a utility, but the plan for growth should be compared to where limiting infrastructure is located such as siphons, pump stations, and the water reclamation facility. With growth in Alternative 3 increasing downtown, as well as in the West Plains, this could require improvements to the Post Street Bridge Trunk Line and Clarke Ave pump station, as well as the Latah Creek Siphon.

Stormwater

Alternative 3 concentrates most of the growth in the downtown core where there is already a lot of development. Since redevelopment is unlikely to increase stormwater runoff, other than maintaining the existing stormwater mitigation standards, no further action is likely needed.

3.9.3 Mitigation Measures

Incorporated Plan Features

While the alternatives do not specifically discuss utilities, the City's Comprehensive Plan does include a section on utilities that lists the policies, goals, and regulations that are set to provide safe, reliable, and equitable service that addresses growth throughout the city; protect water quality; advocate for water conservation; encourage energy efficiency; and revitalize the community. These policies include City programs to reduce water use through grants for low water use landscaping, requirements for onsite stormwater treatment, disposal for new developments, and targeting infrastructure improvements in historically underserved areas. The City plans to update its level of service standards for water service to better align with the Washington Department of Health's (DOH) standards. Their current standard targets meeting 45 pounds per square inch (PSI) of pressure at a minimum. The DOH standard better targets pressures with system flows like a minimum service pressure of 30 PSI during the maximum day flow as well as meeting required minimum fire flows at 20 PSI. Updating this standard will allow the City to better align its goals with state regulatory standards.

Regulations and Commitments

Electrical

Federal

- National Electrical Code, as adopted by the National Fire Protection Association

State

- 2019 Washington State Clean Energy Transformation Act, amending portions of RCW Titles 19 (Business Regulations – Miscellaneous), 43 (State Government – Executive), 80 (Public Utilities), and 82 (Excise Taxes) to commit Washington to an electricity supply free of greenhouse gas emissions by 2045.
- Washington State Energy Code, WAC Title 51, Chapters 11C and 11R

Local

- Electric Service Requirements administered by Avista

Drinking Water

Federal

- Safe Drinking Water Act, 42 USC 300 et seq., Chapter 6A, administered but the U.S. Environmental Protection Agency

State

- Water Systems, WAC Title 246, Chapters 290-296, administered by the Washington State Department of Health

Local

- Public Utilities and Services, Spokane Municipal Code Title 13 Chapter 13.04 – Water
- City of Spokane Design Standards

Wastewater

Federal

- National Environmental Policy Act United States Code (USC) 4321 et seq.
- Clean Water Act, 33 United States Code (USC) 1251 et seq., including Section 402 – National Pollutant Discharge Elimination System (NPDES)

State

- State Environmental Policy Act (SEPA) RCW Title 43.21C; WAC 197-11

- Washington State Department of Ecology, WAC Title 173, Chapters 200-270, which includes administration of the NPDES program, discharge and effluent standards, the waste discharge general permit program, construction of wastewater treatment plants, and construction and operation of combined sewer overflow reduction facilities
- NPDES Wastewater Discharge Permit program, administered by the Washington State Department of Ecology
- Wastewater Collection System Consent Decree, administered by the Washington State Department of Ecology and U.S. Environmental Protection Agency

Local

- Public Utilities and Services, Spokane Municipal Code Title 13 Chapter 13.03 – Sewers
- City of Spokane Design Standards

Stormwater

Federal

- Clean Water Act, 33 USC 1251 et seq., including Section 402 – National Pollutant Discharge Elimination System
- Endangered Species Act, 16 USC 1531 et seq.

State

- National Pollutant Discharge Elimination System (NPDES) Western Washington Phase I Municipal Stormwater General Permit, administered by the Washington State Department of Ecology
- NPDES Industrial Stormwater General Permit, administered by the Washington State Department of Ecology
- Stormwater Management Manual for Eastern Washington, administered by the Washington State Department of Ecology
- Washington State Hydraulic Code, WAC Title 220, Chapter 660, administered by the Washington Department of Fish and Wildlife

Local

- Public Utilities and Services, Spokane Municipal Code Title 13 Chapter 13.03 – Sewers
- City of Spokane Design Standards
- Spokane Regional Stormwater Manual

Other Potential Mitigation Measures

While each alternative has the potential to impact utilities through increased demand, none of these impacts are identified as significant adverse impacts. City codes regulating construction and future

utility investments will continue to ensure new development addresses any service or capacity constraints.

The City and Avista regularly plan and adapt to changing growth patterns and are currently engaged in efforts to improve the water system and address long-term demand and climate change effects on water supplies and the aquifer, address wastewater and drainage system capacity, meet electrical demand, and increase the resiliency of their utility systems to growth and impacts of climate change.

Some recommendations in the June 2025 Climate Risk and Vulnerability Assessment include:

- Consider expanding local energy resources. An example includes: Maximize renewable energy sources for the supply of electricity and heat to new and existing buildings.
- Invest in public infrastructure to improve energy efficiency.
- Invest in upgrading gray and green infrastructure.
- Minimize runoff. This could include requiring the use of green infrastructure and low-impact development to address increased storm intensities and stormwater runoff.
- Protect critical aquifer recharge areas.
- Implement community-based water use efficiency.

3.9.4 Significant Unavoidable Adverse Impacts

None of the alternatives are anticipated to create significant unavoidable adverse impacts to the ability of the City or Avista to deliver utility services to the population of Spokane. While there are some inconsistencies between areas targeted for future growth and planned infrastructure improvements or expansion areas, the City and Avista regularly review changes in growth patterns and are actively engaged in efforts to improve wastewater and drainage system capacity and reduce water consumption and electrical demand. City codes regulating construction and future utility investments will continue to ensure new development addresses any service or capacity constraints.

4 Acronyms and References

4.1 Acronyms

ACS	American Community Survey
ADA	Americans with Disabilities Act
ADU	Accessory Dwelling Unit
AIAN	American Indian and Alaska Native
ALT	Alternative
AMI	Area Median Income
AOP	Air Operating Permits
BIPOC	Black, Indigenous, and People of Color
BMPs	Best Management Practices
BRT	Bus Rapid Transit
CAA	Clean Air Act
CAGR	Compound Annual Growth Rate
CARA	Critical Aquifer Recharge Area
CFCs	chlorofluorocarbons
CIP	Capital Improvement Program
CO	Carbon Monoxide
CPPs	Spokane County Countywide Planning Policies
CSO	Combined Sewer Overflow
DAHP	Department of Archaeology and Historic Preservation, Washington State
DCAs	Drainage Concern Areas
EIS	Environmental Impact Statement
EMS	Emergency Medical Services
EPA	Environmental Protection Agency
ERU	Equivalent Residential Unit
ESD	Employment Security Department, Washington State
FEMA	Emergency Management Agency
GHG	Greenhouse Gas
GMA	Growth Management Act
HAP	Housing Action Plan
HAPT	Housing for All Planning Tool
HB	House Bill
HCM	Highway Capacity Manual
HOV	High Occupancy Vehicle
HPT	High-Performance Transit
ICWP	Integrated Clean Water Plan
IRP	Integrated Resource Plan
LCA	Land Capacity Analysis
LOS	Level of Service
MFTE	Multifamily Tax Exemption
mgd	million gallons per day

MPH	Miles per Hour
N.D.	Not Dated
NAAQS	National Ambient Air Quality Standards
NO_2	Nitrogen Dioxide
NOC	Notice of Construction
NPDES	National Pollutant Discharge Elimination System
NSC	North Spokane Corridor
NWI	National Wetlands Inventory
O_3	Ozone
OFM	Office of Financial Management, Washington State
PPPH	Persons per Household
PSD	Prevention of Significant Deterioration
PSI	pounds per square inch
RCW	Revised Code of Washington
RDI	Racially Disparate Impacts
RPWRF	Riverside Park Wastewater Reclamation Facility
s.f.	square feet
SMA	Shoreline Management Act
SMC	Spokane Municipal Code
SMP	Shoreline Master Program
SO_2	Sulfur Oxide
SOV	Single Occupancy Vehicle
SR	State Route
SRCAA	Spokane Regional Clean Air Agency
SRTC	Spokane Regional Transportation Council
ST	Street
STA	Spokane Transit Agency
SVI	Social Vulnerability Index
SWAP	Washington State Wildlife Action Plan
TAZ	Transportation Analysis Zones
TDM	Transportation Demand Management
TOD	Transit Oriented Development
U.S., US	United States
USFWS	U.S. Fish and Wildlife Service
V/C	Volume to Capacity
VMT	Vehicle Miles Traveled
WAC	Washington Administrative Code
WDFW	Washington Department of Fish and Wildlife
WRIA	Water Resource Inventory Area
WSDOT	Washington State Department of Transportation

4.2 References

4.2.1 Earth, Water Quality, and Water Resources

Ecology (Washington State Department of Ecology). 2018. Washington State Water Quality Assessment 303(d)/305(b) List. https://ecology.wa.gov/Water-Shorelines/Water-quality/Water-improvement/Assessment-of-state-waters-303d. Accessed August 11, 2025.

Ecology. 2019a. Stormwater Management Manual for Western Washington. Department of Ecology Water Quality Program. Publication Number 19 10 021. July 2019.

Ecology. 2019b. Phase I NPDES Municipal Stormwater General Permit. Effective August 1, 2019; modified October 20, 2021; expires on July 31, 2024.

Ecology. 2021. National Pollutant Discharge Elimination System Construction Stormwater General Permit. Effective January 1, 2021; expires December 31, 2025.

Ecology. 2025. PFAS in West Plains private wells. https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-sites/sites-with-pfas-in-drinking-water/west-plains-pfas. Accessed on August 15, 2025.

FEMA (Federal Emergency Management Agency). 2024. Federal Flood Risk Management Standard. Policy 206-24-005. https://www.fema.gov/sites/default/files/documents/fema_floodplain-management_ffrms-policy_092024.pdf. September 2024.

Spokane, City of. Spokane Regional Stormwater Manual (Spokane et. al., 2008)

Spokane, City of. 2013. Stormwater Management Planning of the West Plains Subarea of Spokane, West Plains Geology and Hydrology Report. April 2013.

Spokane, City of. 2025. Spokane Climate Policy Audit. Prepared by: BERK, Cascadia Consulting Group, Fehr & Peers, and Parametrix. Available: https://static.spokanecity.org/documents/planspokane/climate-planning/spokane-climate-policy-audit-memo.pdf. Accessed: August 19, 2025.

United States Department of Agriculture (USDA) SSURGO Soils. 2025. https://www.nrcs.usda.gov/resources/data-and-reports/soil-survey-geographic-database-ssurgo. Accessed August 5, 2025.

WSDOT (Washington State Department of Transportation). 2019a. Highway Runoff Manual. M 31-16. https://www.wsdot.wa.gov/Publications/Manuals/M31-16.htm. April 2019.

WSDOT. 2019b. Hydraulics Manual. M 23 03. https://www.wsdot.wa.gov/Publications/Manuals/M23-03.htm. April 2019.

4.2.2 Air Quality

Air Quality Index Basics. (2025). Retrieved from AirNow.org: https://www.airnow.gov/aqi/aqi-basics/

BERK Consulting, Inc. (2025). *Spokane Climate Vulnerability Index*. Retrieved from https://experience.arcgis.com/experience/cf4009af3d13499d8daba03ca580365c/page/Vulnerability-Index

BERK Consulting, Inc.; Cascadia Consulting Group. (2025, January 14). *Spokane Climate Impacts and Climate Justice.* Retrieved from City of Spokane: https://static.spokanecity.org/documents/planspokane/climate-planning/spokane-climate-impacts-and-climate-justice-memo-2025-03-07.pdf

City of Spokane. (2017, June). *Shaping Spokane: Comprehensive Plan for the City of Spokane.* Retrieved from City of Spokane: https://static.spokanecity.org/documents/shapingspokane/comprehensive-plan/approved-comprehensive-plan-2017-v12-2023-09-07.pdf

City of Spokane. (2025). *2022 Community and Local Government Operations Greenhouse Gas Emissions Inventory Report.* Retrieved from https://static.spokanecity.org/documents/publicworks/environmental/2019-city-of-spokane-greenhouse-gas-inventory.pdf

City of Spokane. (2025, June). *Climate Planning.* Retrieved from City of Spokane: https://static.spokanecity.org/documents/planspokane/climate-planning/spokane-city-crva-final-no-appendix-6-19-25-sh.pdf

EPA. (2014). *Near Roadway Air Pollution and Health: Frequently Asked Questions.* Office of Transportation and Air Quality. Retrieved from https://www.epa.gov/sites/default/files/2015-11/documents/420f14044_0.pdf

EPA. (2025). *Ground-level Ozone Basics*. Retrieved from EPA: https://www.epa.gov/ground-level-ozone-pollution/ground-level-ozone-basics#wwh

Hegewisch, K., & Abatzoglou, J. (n.d.). *Future Boxplots*. Retrieved August 1, 2024, from Climate Toolbox: https://climatetoolbox.org/tool/future-boxplots

Institute for Climate, Water, and the Environment. (2022). *Spokane Urban Heat Maps.* Retrieved from Institute for Climate, Water, and the Environment: https://www.gonzaga.edu/climate-institute/projects/climate-resilience-project/understanding/heat-mapping

Spokane Regional Clean Air Agency. (2021). *Weather affects our air quality*. Retrieved from Spokane Regional Clean Air Agency: https://spokanecleanair.org/weather-affects-our-air/

Spokane Regional Clean Air Agency. (2023). *High temperatures contribute to ground-level ozone formation*. Retrieved from Spokane Regional Clean Air Agency: https://spokanecleanair.org/high-temperatures-contribute-to-ground-level-ozone-formation/

Spokane Regional Clean Air Agency. (2025). *Air Pollutants & Trends*. Retrieved from Spokane Clean Air Agency: https://spokanecleanair.org/air-quality/air-pollutants-trends-reports/

Spokane Regional Clean Air Agency. (2025). *Spokane Regional Clean Air Agency*. Retrieved from Spokane Clean Air: https://spokanecleanair.org/air-quality/air-pollutants-trends-reports/

Spokane Regional Clean Air Agency. (2025). *Spokane Regional Clean Air Agency*. Retrieved from Clean Air Report Card for 2024: https://spokanecleanair.org/the-2024-air-quality-data-for-spokane-county-is-official-and-the-news-is-largely-positive-overall-the-air-quality-was-good-though-not-perfect/

Spokane Regional Clean Air Agency. (2025). *Spokane Regional Clean Air Agency*. Retrieved from Outdoor Burning: https://spokanecleanair.org/burning/outdoor-burning/

Spokane Regional Clean Air Agency. (2025). *Spokane Regional Clean Air Agency - Air Quality Report - May 2025.* Spokane Regional Clean Air Agency. Retrieved from https://spokanecleanair.org/wp-content/uploads/AQ-May-2025.pdf

Spokane Regional Clean Air Agency. (2025, July 1). *Notice of Construction Information Sheet.* Retrieved from Spokane Regional Clean Air Agency: https://spokanecleanair.org/wp-content/uploads/NOC-Info-Sheet.pdf

Spokane Regional Transportation Council. (2021, December 9). *Horizon 2045 - Spokane Metropolitan Transportation Plan.* Retrieved from SRTC: https://srtc.org/wp-content/uploads/2025/02/Horizon2045_compressed.pdf

Spokane Regional Transportation Council. (2025). *Metropolitan Transportation Plan - Horizon 2045*. Retrieved from https://srtc.org/our-work/core-plans-and-programs/metropolitan-transportation-plan/#2045

U.S. Environmental Protection Agency. (2025, June 17). *Outdoor Air Quality*. Retrieved from United States Environmental Protection Agency: https://www.epa.gov/report-environment/outdoor-air-quality

US Department of Energy. (2025). *Low-income Energy Affordability Data Tool.* Retrieved from https://www.energy.gov/scep/slsc/lead-tool

Washington State Department of Ecology. (2025). *Carbon monoxide in Washington's air*. Retrieved from Washington State Department of Ecology: https://ecology.wa.gov/air-climate/air-quality/air-quality-targets/air-quality-standards/carbon-monoxide

Washington State Department of Ecology. (2025). *Lead in Washington's air*. Retrieved from Washington State Department of Ecology: https://ecology.wa.gov/air-climate/air-quality/air-quality-targets/air-quality-standards/lead

Washington State Department of Ecology. (2025). *Nitrogen dioxide in Washington's air*. Retrieved from Washington State Department of Ecology: https://ecology.wa.gov/air-climate/air-quality/air-quality-targets/air-quality-standards/nitrogen-dioxide

Washington State Department of Ecology. (2025). *Prevention of Significant Deterioration (PSD) Permit*. Retrieved from Washington State Department of Ecology: https://ecology.wa.gov/regulations-permits/permits-certifications/air-quality-permits/prevention-of-significant-deterioration-psd

Washington State Department of Ecology. (2025). *Verification of Continued Attainment in Select Maintenance Areas (2025).* Washington State Department of Ecology. Retrieved from https://apps.ecology.wa.gov/publications/SummaryPages/2502018.html

Washington State Department of Ecology. (n.d.). *General orders for air quality permits*. Retrieved from Washington State Department of Ecology: https://ecology.wa.gov/regulations-permits/permits-certifications/air-quality-permits/air-quality-general-orders

Washington State Legislature. (2025). *General Regulations For Air Pollution Source.* Retrieved from https://app.leg.wa.gov/wac/default.aspx?cite=173-400

4.2.3 Plants and Animals

Burke Museum. 2025a. “Mammals of Washington.” Accessed July 31, 2025 at https://www.burkemuseum.org/collections-and-research/biology/mammalogy/mamwash/?_ga=2.185509036.462253364.1754549419-853978113.1754549419

Burke Museum. 2025b. “Amphibians & Reptiles of Washington.” Accessed August 1, 2025 at https://www.burkemuseum.org/collections-and-research/biology/herpetology/amphibians-reptiles-washington

eBird.org. 2025. Spokane, WA bird list. Accessed July 31, 2025 at https://ebird.org/region/US-WA-063/bird-list?yr=curM

Federal Emergency Management Agency (FEMA). 2024. "Benefits of Natural Floodplains." Last updated July 26, 2024. Accessed August 4, 2025 at https://www.fema.gov/floodplain-management/wildlife-conservation/benefits-natural

FEMA. 2025. FEMA National Flood Hazard Layer Viewer. Accessed July 31, 2025 at https://www.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd

Fryer, Janet L. 2016. Fire regimes of Northern Rocky Mountain ponderosa pine communities. In: Fire Effects Information System, [Online]. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Missoula Fire Sciences Laboratory (Producer). Available: www.fs.usda.gov/database/feis/fire_regimes/Northern_RM_ponderosa_pine/all.html Accessed August 5, 2025.

Hennings, L. and Soll, J. 2010. Wildlife Corridors and Permeability: A Literature Review. Portland, OR: Metro Sustainability Center, April 2010.

Inland Northwest Land Conservancy. 2016. “Restoring the Spokane River: Community Collaboration.” September 1, 2016. Accessed August 1, 2025 at https://inlandnwland.org/restoring-the-spokane-river-community-collaboration/

Krausman, P. R., S. Smith, J. Derbridge and J. A. Merkle. 2008. Suburban and exurban influences on wildlife and fish. FWP Project 2801. Wildlife Division, Montana Fish, Wildlife & Parks, Helena, USA.

Manthey, G., Marinkovic, M., Lalonde, S., and Chehab, S. 2021. *Urban Tree Analysis Report 2020*. A Collaboration between the City of Spokane, the Spokane Lands Council, and Gonzaga University.

Mulvany, Colin. 2019. "Bullfrogs in Cannon Hill Pond." The Spokesman-Review, June 14, 2019. Accessed online July 28, 2025 https://www.spokesman.com/galleries/2019/jun/14/bullfrogs-in-cannon-hill-pond/

NatureServe Explorer. 2025. Information on the Columbia Plateau and Columbia Mountains/Northern Rockies Level III ecoregions. Accessed July 28, 2025 at https://explorer.natureserve.org/pro/Welcome

Spokane City/County Historic Preservation Office. 2025. Accessed online at https://www.historicspokane.org/. August 4, 2025

Spokane Conservation District. 2012. Hangman (Latah) Creek Watershed Riparian Action Plan. November 21, 2012

Spokane Conservation District 2025. "Restored Access Points" Accessed August 1, 2025 at https://spokanecd.org/blogs/news/spokane-river-restored-access-points

Spokane County Noxious Weed Control Board 2025. "Weeds of Concern." Accessed July 20,2025 at https://www.spokanecounty.gov/1095/Noxious-Weed-Control

Spokane Parks and Recreation, Urban Forestry Division. 2025. "SpoCanopy." Accessed August 4, 2025 at https://my.spokanecity.org/urbanforestry/programs/spocanopy/#:~:text=We%20want%20to%20ensure%20every,Learn%20more!

Spokane Riverkeeper. 2025. Redband trout, Spokane's fish. Accessed July 28, 2025 at https://www.spokaneriverkeeper.org/spokanes-redband-trout

Spokane Water Trail 2025. "Fishing." https://www.spokaneriver.net/watertrail/fishing/ accessed July 30, 2025

SWIFD (Statewide Washington Integrated Fish Distribution). 2025. Datamap. Accessed July 20, 2025. https://geo.nwifc.org/swifd/

USDA-FSA (U.S. Department of Agriculture Farm Service Agency). 2018. Primary Nesting Season Dates and Duration. Accessed March 14, 2023 at https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdafiles/Conservation/PDF/primary-nesting-season.pdf.

USFWS (U.S. Fish and Wildlife Service). 2007. National Bald Eagle Management Guidelines. May 2007. Accessed March 12, 2024 at https://www.fws.gov/sites/default/files/documents/national-bald-eagle-management-guidelines_0.pdf https://www.fws.gov/sites/default/files/documents/national-bald-eagle-management-guidelines_0.pdf.

USFWS. 2025a. National Wetlands Inventory (NWI) Wetlands Mapper. Accessed August 3, 2025 at https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper

USFWS 2025b. IPaC Information for Planning and Consultation database: Washington Fish and Wildlife Office official species list. July 3, 2025. https://ipac.ecosphere.fws.gov/

U.S. Geological Survey (USGS). 2023. National Land Cover Dataset.

Visit Spokane 2025. "Fly Fishing on the Spokane River." Accessed July 30, 2025 at https://www.visitspokane.com/blog/fly-fishing-the-spokane-river/#:~:text=Types%20of%20Fish%20in%20the,about%20a%2050/50%20split

Washington Department of Ecology (Ecology). 2020. Hangman (Latah) Creek Hydrogeologic Assessment Focusing on the Latah Creek Wastewater Treatment Plant. November 2020, Publication 20-03-013

_____ Ecology 2025a. "Making Improvements in the Spokane River Watershed." Accessed July 25, 2025 at https://ecology.wa.gov/ecologys-work-near-you/river-basins-groundwater/spokane-river-watershed

_____ Ecology. 2025b. Hangman Creek multi-parameter TMDL. Accessed October 17, 2025 at https://.ecology.wa.gov/water-shorelines/water-quality/water-improvement/total-maximum-daily-load-process/directory-of-improvement-projects/hangman-creek _____ Ecology. 2025c. Hangman Settlement Agreement 2024 Annual Report. July 2025.

Washington Department of Fish and Wildlife (WDFW). 2023. Priority Habitats and Species Local Government User Guide. May 12, 2023. Accessed July 20, 2025 at https://wdfw.wa.gov/sites/default/files/publications/02426/wdfw02426.pdf.

WDFW. 2025a. "Ecosystems in Washington: Shrubsteppe." Accessed August 4, 2025 at https://wdfw.wa.gov/species-habitats/ecosystems/shrubsteppe

WDFW. 2025b. "Priority Habitats and Species List." Accessed August 4, 2025 at https://wdfw.wa.gov/species-habitats/at-risk/phs/list

WDFW. 2025c. PHS on the Web. Accessed August 4, 2025 at https://geodataservices.wdfw.wa.gov/hp/phs/.

WDFW. 2025d. "Living with Wildlife - Species fact sheets" Accessed August 4, 2025 at https://wdfw.wa.gov/species-habitats/living/species-facts#mammals

WDFW. 2025e. "Species in Washington." Accessed July 30, 2025 at https://wdfw.wa.gov/species-habitats/species

WDFW. 2025f. "Northern pike (*Esox lucius*)." Accessed October 17, 2025 at https://wdfw.wa.gov/species-habitats/invasive/esox-lucius#:~:text=The%20northern%20pike%20(Esox%20Lucius,water%20bodies%20within%20the%20state

Washington Shrubsteppe Restoration and Resiliency Initiative. (2024). Retrieved from Washington State Department of Fish and Wildlife: https://wdfw.wa.gov/species-habitats/habitat-recovery/shrubsteppe#strategy.

Washington State Department of Natural Resources (WDNR). 2025. Washington Natural Heritage Program Data Explorer. Accessed July 30, 2025 at https://www.dnr.wa.gov/NHPdataexplorer

Washington State Department of Transportation (WSDOT). 2019. US 395 North Spokane Corridor - Spokane River Bridge Project Biological Assessment.

Washington State Noxious Weed Control Board 2025. Spokane County Noxious Weed List. Accessed July 20, 2025. https://www.nwcb.wa.gov/pdfs/Spokane-County.pdf

4.2.4 Land Use Patterns and Urban Form

Arksey, L. (2005, September 4). *Spokane — Thumbnail History.* Retrieved from HistoryLink.org Essay 7462: https://historylink.org/File/7462

BERK. (2025). *Spokane Climate Vulnerability Index*. Retrieved from https://experience.arcgis.com/experience/cf4009af3d13499d8daba03ca580365c/page/Vulnerability-Index

City of Spokane. (2008). *Fast Forward Spokane: Downtown Plan Update.* Retrieved from https://static.spokanecity.org/documents/business/resources/compplan/subarea/fast-forward-downtown-plan-update.pdf

City of Spokane. (2015, Jan 26). *Ordinance No. C35212 Hamilton Form Based Code Subarea Plan.* Retrieved from https://static.spokanecity.org/documents/projects/logan/formbased/ord-c35212-hamilton-form-based-code.pdf

City of Spokane. (2017). *Building Heights on Spokane Falls Boulevard: A Study Into the Challenges and Opportunities of the Spokane Municipal Code, the Downtown Plan, and the Development Requirements of the City of Spokane as they Apply to Shading on Riverfront Park.* Retrieved from https://static.spokanecity.org/documents/projects/building-heights-on-spokane-falls-boulevard/building-heights-on-spokane-falls-boulevard-final-draft-report-oct-2017.pdf

City of Spokane. (2017). *Shaping Spokane.* Retrieved from A Comprehensive Plan for the future of Spokane: https://my.spokanecity.org/shapingspokane/comprehensive-plan/

City of Spokane. (2017, June 23). *RES 2017-0056 - Resolutions (Agenda Item 0650: Chief Garry Park Neighborhood Action Plan 2017)*. Retrieved from https://static.spokanecity.org/documents/projects/chief-garry-park-neighborhood/res-2017-0056-final-signed.pdf

City of Spokane. (2022, May). *Transit-Oriented Development Framework Study.* Retrieved from https://static.spokanecity.org/documents/projects/transit-oriented-development-study/tod-framework-study-final-2022-05-06.pdf

City of Spokane. (2023, October 12). *Centers and Corridors (GIS Map)*. Retrieved from https://www.arcgis.com/home/webmap/viewer.html?webmap=9f72209fc23a46f69e8cd07f83ffd2ad&extent=-117.7083,47.4965,-117.0979,47.8161

City of Spokane. (2024, January 29). *South Logan TOD Final Plan (Adopted).* Retrieved from South Logan TOD Project: https://static.spokanecity.org/documents/projects/south-logan-tod/south-logan-tod-final-plan-adopted-2024-01-29.pdf

City of Spokane. (2025). *Centers and Corridors Study.* Retrieved from Projects: https://my.spokanecity.org/projects/centers-and-corridors-study/

City of Spokane. (2025, February). *2025 Land Capacity Analysis.* Retrieved from https://static.spokanecity.org/documents/planspokane/2025-land-capacity-analysis.pdf

City of Spokane. (n.d.). *Spokane Area History.* Retrieved from https://my.spokanecity.org/about/history/

City-County of Spokane Historic Preservation Office. (2005). *Downtown Spokane Heritage Walk .* Retrieved from Spokane History: https://www.historicspokane.org/HeritageTours/downtown/history.html

Historical Research Associates, Inc. (2015). *Chrisanne Beckner, MS, and Natalie K. Perrin, MS.* Retrieved from City of Spokane Parks and Boulevards (1891-1974), National Register of Historic Places Multiple Property Documentation Form: https://www.historicspokane.org/wp-content/uploads/2015/10/City-of-Spokane-Parks-and-Boulevards-MPD-2015.pdf

Institute for Climate, Water, and the Environment. (2022). *Spokane Urban Heat Maps.* Retrieved from Institute for Climate, Water, and the Environment: https://www.gonzaga.edu/climate-institute/projects/climate-resilience-project/understanding/heat-mapping

Kershner, J. (2007, January 25). *Spokane's Streetcars.* Retrieved from HistoryLink: https://www.historylink.org/File/8080

MRSC. (2025, February 10). *Light Nuisances - Ambient Light, Light Pollution, Glare.* Retrieved from MRSC: https://mrsc.org/explore-topics/code-enforcement/nuisances/light-nuisances

Nelson, R. K., Winling, L, et al. (2023). *Mapping Inequality Redlining in New Deal America.* Retrieved from Digital Scholarship Lab: https://dsl.richmond.edu/panorama/redlining/map/WA/Spokane#loc=12/47.668/-117.3898

Perk, V. C. (2017). *Impacts of Bus Rapid Transit (BRT) on Surrounding Residential Property Values.* Retrieved from National Institute for Transportation and Communities. NITC-RR-894. Portland, OR: Transportation Research and Education Center (TREC).: https://doi.org/10.15760/trec.178

Spokane City/County Historic Preservation Office. (2024). *Updating the Historic Preservation Code SMC 17D.100.230.* Retrieved from HistoricSpokane: https://www.historicspokane.org/centers-and-corridors

Spokane City/County Historic Preservation Office. (2025, July). *Spokane City and County Historic Districts and Properties.* Retrieved from https://www.historicspokane.org/

Spokane Tribe of Indians. (2020). *The History of the Spokane Tribe of Indians.* Retrieved from https://www.spokanetribe.com/history/

Transit Maps. (2017). *Spokane United Railways system map from 1929 - Spokane once had one of the most extensive electric trolley systems in the country.* Retrieved from Reddit: https://www.reddit.com/r/Spokane/comments/7153yu/spokane_united_railways_system_map_from_1929/

Washington Department of Archaeology and Historic Preservation. (2025, August 6). *Archaeological Risk Assessment Model.* Retrieved from WISAARD: https://wisaard.dahp.wa.gov/map

Washington State Digital Archives. (n.d.). Retrieved from https://digitalarchives.wa.gov/do/CFDB6E8CABCB839591606C6B0DCDD4CF.jpg

Washington State Office of Archaeology and Historic Preservation. (1976, January). *Browne's Addition Historic District.* Retrieved from NATIONAL REGISTER OF HISTORIC PLACES INVENTORY--NOMINATION FORM: https://properties.historicspokane.org/_pdf/districts/national/district-national-18.pdf

Wu, J. (2024, February 15). *Light Pollution Explained: Impacts and Solutions.* Retrieved from Leotek: https://leotek.com/light-pollution/

4.2.5 Population, Housing, and Employment

BERK Consulting, Inc.; Cascadia Consulting Group. (2025, January 14). *Spokane Climate Impacts and Climate Justice.* Retrieved from City of Spokane: https://static.spokanecity.org/documents/planspokane/climate-planning/spokane-climate-impacts-and-climate-justice-memo-2025-03-07.pdf

Chapple, K. (.-S. (2021, February 28). *White Paper on Anti-Displacement Strategy Effectiveness.* Retrieved from Prepared for the California Air Resources Board: https://www.urbandisplacement.org/wp-content/uploads/2021/08/19RD018-Anti-Displacement-Strategy-Effectiveness.pdf

City of Spokane. (2021, July 16). *Spokane Housing Action Plan.* Retrieved from https://my.spokanecity.org/housing/spokane-housing-action-plan/

City of Spokane. (2025, February). *2025 Land Capacity Analysis.* Retrieved from https://static.spokanecity.org/documents/planspokane/2025-land-capacity-analysis.pdf

City of Spokane. (2025). *Division Street Transit-Oriented Development*. Retrieved from Spokane City > Projects: https://my.spokanecity.org/projects/division-street-transit-oriented-development/

City of Spokane. (2025). *Map Spokane*. Retrieved from https://spokane.maps.arcgis.com/apps/webappviewer/index.html?id=3bd21df38df54be58870e0d66c80d6ae

City of Spokane. (Undated). *Spokane Homeless System Map.* Retrieved from https://static.spokanecity.org/documents/ending-homelessness/about/spokane-homeless-system-map.pdf

City of Spokane. (2025, September). *Racially Disparate Impacts Analysis.* Retrieved from HB 1220: Racially Disparate Impacts, Displacement, and Exclusion in Housing: https://my.spokanecity.org/planspokane/housing-needs/racially-disparate-impacts/

City of Spokane. (June 2025). *Accommodating Affordable Housing in the City of Spokane, Washington.* Spokane.

Kapatsila, B. R. (2024). *If you build it, who will come? Exploring the effects of rapid transit on residential movements in Metro Vancouver.* Retrieved from Journal of Transport and Land Use, 17(1), 163–185.: https://doi.org/10.5198/jtlu.2024.2364

OFM. (Undated). *April 1 Definitions.* Retrieved from https://ofm.wa.gov/wp-content/uploads/sites/default/files/public/dataresearch/pop/april1/ofm_april1_definitions.pdf

Northeast PDA. (2025, July 24). *Hillyard Subarea Plan.* Retrieved from City of Spokane > Projects > Hillyard Subarea Plan: https://static.spokanecity.org/documents/projects/hillyard-subarea-plan/hillyard-subarea-plan-draft-2025-07-24.pdf

Savageau, A. (2023, March 15). *How Housing and Education Drive Inequality.* Retrieved from University of Michigan, Michgan Journal of Economics: https://sites.lsa.umich.edu/mje/2023/03/15/how-housing-and-education-drive-inequality/

Seva Rodnyansky, D. S. (2025, July 31). *Pew*. Retrieved from New Housing Slows Rent Growth Most for Older, More Affordable Units: https://www.pew.org/en/research-and-analysis/articles/2025/07/31/new-housing-slows-rent-growth-most-for-older-more-affordable-units

Small Business Anti-Displacement Network. (2024). *Small Business Anti-Displacement Toolkit.* Retrieved from https://antidisplacement.org/toolkit/

Spokane Trends. (2023). *Public Safety*. Retrieved from spokanetrends.org

Steering Committee of Elected Officials. (2024, May 15). *First-Round Population Forecast and Allocation.* Retrieved from Report and Recommendation to the Steering Committee of Elected Officials: https://www.spokanecounty.gov/DocumentCenter/View/54949/2026-2046-Initial-Jurisdictional-Population-Allocation-SCEO-Recommendation-051524---signed?bidId=

Trust for Public Land. (2024, August). *Great parks should not uproot communities*. Retrieved from Alessandro Rigolon, The University of Utah: https://www.tpl.org/wp-content/uploads/2024/08/081224_Green-Papers_Great-Parks_G_final.pdf

Urban Institute. (2025, July). *Generating Affordable and Abundant Transit-Oriented Development in Washington State.* Retrieved from https://www.urban.org/sites/default/files/2025-07/Generating_Affordable_and_Abundant_Transit_Oriented_Development_in_Washington_State.pdf

Washington Office of Financial Management. (2025). *April 1, 2025 Population of Cities, Towns, and Counties*. Retrieved from https://ofm.wa.gov/sites/default/files/public/dataresearch/pop/april1/ofm_april1_population_final.pdf

Washington State Department of Commerce. (2023, August). *Guidance for Updating your Housing Element*. Retrieved from Book 2: https://deptofcommerce.app.box.com/s/1d9d5l7g509r389f0mjpowh8isjpirlh

Washington State Department of Commerce. (2023, April). *Guidance to Address Racially Disparate Impacts.* Retrieved from Book 3 of GMA housing element guidance: https://deptofcommerce.app.box.com/s/1l217l98jattb87qobtw63pkplzhxege

4.2.6 Relationship to Plans, Policies, and Regulations

Chief Garry Park Neighborhood Council. (2017). *Chief Garry Park Neighborhood Action Plan 2017.* Retrieved from https://static.spokanecity.org/documents/projects/chief-garry-park-neighborhood/chief-garry-park-neighborhood-plan-final.pdf

City of Spokane. (2012, Jan 30). *RES 2012-0007: 0650 Five Mile Prairie Neighborhood Planning.* Retrieved from City Council Meeting Agenda Sheet: https://static.spokanecity.org/documents/projects/fivemileprairie/five-mile-city-council-resolution.pdf

City of Spokane. (2014, July 28). *Council Agenda (July 28, 2014) - Resolution 2014-0086*. Retrieved from City Council Legislative Meeting: https://my.spokanecity.org/citycouncil/meetings/2014/07/28/legislative-meeting/?utm_source=chatgpt.com

City of Spokane. (2014, June 22). *West Plains Draft Transportation Subarea Plan.* Retrieved from Projects > West Plains Subarea: https://static.spokanecity.org/documents/projects/westplainssubarea/west-plains-transportation-subarea-plan-07-22-2014.pdf

City of Spokane. (2016, Dec 12). *City Council Agenda - RES 2016-0099.* Retrieved from City Council Meeting: https://static.spokanecity.org/documents/citycouncil/current-agendas/2016/12/city-council-current-agenda-2016-12-12.pdf

City of Spokane. (2016, October). *Fort George Wright Drive Staton & Corridor Plan: Final West Hills Neighborhood Plan.* Retrieved from City of Spokane Planning & Development Services Department: https://static.spokanecity.org/documents/business/planning/neighborhood/final-west-hills-plan-ft-george-wright-drive-sc-plan.pdf?

City of Spokane. (2017, June 23). *RES 2017-0056 - Resolutions (Agenda Item 0650: Chief Garry Park Neighborhood Action Plan 2017)*. Retrieved from https://static.spokanecity.org/documents/projects/chief-garry-park-neighborhood/res-2017-0056-final-signed.pdf

City of Spokane. (2020, August 24). *South University District Subarea Plan.* Retrieved from Projects > South University District Subarea Planning: https://static.spokanecity.org/documents/projects/south-university-district-sub-area-planning/south-u-district-subarea-plan-adopted-2020-08-24.pdf

City of Spokane. (2021). *Volume V, Appendix H Neighborhood Planning - City of Spokane Resolutions.* Retrieved from City of Spokane Comprehensive Plan: https://static.spokanecity.org/documents/shapingspokane/comprehensive-plan/appendix-h.pdf

City of Spokane. (2023, October 12). *Centers and Corridors (GIS Map)*. Retrieved from https://www.arcgis.com/home/webmap/viewer.html?webmap=9f72209fc23a46f69e8cd07f83ffd2ad&extent=-117.7083,47.4965,-117.0979,47.8161

City of Spokane. (2023, September 7). *Shaping Spokane - Comprehensive Plan for the City of Spokane.* Retrieved from https://static.spokanecity.org/documents/shapingspokane/comprehensive-plan/approved-comprehensive-plan-2017-v12-2023-09-07.pdf

City of Spokane. (2024, January 29). *South Logan TOD Final Plan (Adopted).* Retrieved from South Logan TOD Project: https://static.spokanecity.org/documents/projects/south-logan-tod/south-logan-tod-final-plan-adopted-2024-01-29.pdf

City of Spokane. (2025). *5th Avenue Community Plan*. Retrieved from Projects: https://my.spokanecity.org/projects/fifth-avenue-plan/

City of Spokane. (2025). *Centers and Corridors Study.* Retrieved from Projects: https://my.spokanecity.org/projects/centers-and-corridors-study/

City of Spokane. (2025). *Neighborhood Planning*. Retrieved from https://my.spokanecity.org/business/planning/neighborhood/?utm_source=chatgpt.com

City of Spokane. (2025). *South Logan TOD Project*. Retrieved from Projects: https://my.spokanecity.org/projects/south-logan-transit-oriented-development-project/

City of Spokane. (n.d.). *Downtown Plan Update*. Retrieved from Projects: https://my.spokanecity.org/projects/downtown-plan-update/

City of Spokane. (n.d.). *North Bank Plan*. Retrieved from Projects: https://my.spokanecity.org/projects/north-bank-plan/

Downtown Spokane Partnership. (2021, July 26). *Spokane Downtown Plan*. Retrieved from Projects > Downtown Plan Update: https://static.spokanecity.org/documents/projects/downtown-plan-update-2020/2021-07-26-spokane-downtown-plan-web.pdf

East Central Neighborhood Partnership Center. (2006). *East Central Neighborhood Plan* . Retrieved from https://static.spokanecity.org/documents/projects/tip/east-central-neighborhood-plan-update.pdf

Eastern Washington University's Planning Team. (2011, December). *Nevada Lidgerwood Neighborhood Planning- Identity Report.* Retrieved from City of Spokane > Projects > Nevada Lidgerwood: https://static.spokanecity.org/documents/projects/nevadalidgerwood/nevada-lidgerwood-neighborhood-identity.pdf

Emerson-Garfield Neighborhood Council. (2014, June). *Emerson-Garfield Neighborhood Action Plan*. Retrieved from City of Spokane > Neighborhood Planning: https://static.spokanecity.org/documents/projects/emersongarfield/emerson-garfield-final-plan-07-10-14.pdf

EWU URP Program. (2011, 12). *Nevada Lidgerwood Neighborhood - Planning Stakeholder Team Meeting.* Retrieved from Projects > Nevada Lidgerwood: https://static.spokanecity.org/documents/projects/nevadalidgerwood/nevada-lidgerwood-non-motorized-travel-safety.pdf

Five Mile Prairie Neighborhood. (2012). *Neighborhood Plan for Bicycle and Pedestrian Improvements*. Retrieved from https://static.spokanecity.org/documents/projects/fivemileprairie/five-mile-bike-pedestrian-improvements.pdf

Friends of Coeur d'Alene & Browne's Addition Neighborhood Association. (2015). *Coeur d'Alene Park Master Plan.* Retrieved from https://static.spokanecity.org/documents/parksrec/aboutus/planning/cda-park-master-plan-final.pdf

Grandview/Thorpe Neighborhood Council. (2015, June 23). *Grandview/Thorpe Neighborhood Action Plan.* Retrieved from https://static.spokanecity.org/documents/bcc/commissions/plan-commission/meeting-documents/2015/07/08/gt-final-draft-2015-06-23.pdf

Greater Hillyard Northeast Planning Alliance. (2010, July 18). *Bemiss, Hillyard, and Whitman Neighborhoods - Report and Final Proposals from the 2009-2010 Neighborhood Planning Activities.* Retrieved from https://static.spokanecity.org/documents/projects/hillyard-subarea-plan/ghnepa-neighborhood-plan-2010.pdf

Greater Spokane Inc. (2022, June). *THRIVE Spokane Comprehensive Economic Development trategy.* Retrieved from GSI > Greater Growth: https://greaterspokane.org/what-we-do/greater-growth/thrivespokane/

Makers, SCJ Studio, & Leland Consulting Group. (2024, June). *City of Spokane Centers and Corridors Study.* Retrieved from Projects > Centers and Corridors Study: https://static.spokanecity.org/documents/projects/centers-and-corridors-study/centers-and-corridors-final-report.pdf

North Hill Neighborhood Council. (2015, June 16). *North Hill Neighborhood Action Plan.* Retrieved from City of Spokane > Business and Development > Neighborhood Planning: https://static.spokanecity.org/documents/projects/north-hill/north-hill-final-draft-plan-2015-06-16.pdf

Northeast PDA. (2025, July 24). *Hillyard Subarea Plan.* Retrieved from City of Spokane > Projects > Hillyard Subarea Plan: https://static.spokanecity.org/documents/projects/hillyard-subarea-plan/hillyard-subarea-plan-draft-2025-07-24.pdf

Peaceful Valley Neighborhood Council. (2015, November 11). *Peaceful Valley Neighborhood Action Plan.* Retrieved from https://static.spokanecity.org/documents/bcc/commissions/plan-commission/meeting-documents/2015/07/08/gt-final-draft-2015-06-23.pdf

SCJ Alliance. (2019, October). *Shadle Area Neighborhood Plan (Plan Commission Draft) - Audubon-Downriver/Northwest Neighborhoods.* Retrieved from City of Spokane > Business Development > Neighborhood Planning: https://static.spokanecity.org/documents/projects/northwest-and-audubon-downriver-neighborhood-planning/shadle-area-draft-plan-2019-october.pdf

Shiloh Hills Neighborhood Council. (2025). *Shiloh Hill Neighborhood Council*. Retrieved from https://shilohhills.spokaneneighborhoods.org/

South Hill Coalition. (2014, June). *Spokane South Hill Coalition Connectivity and Livability Strategic Plan.* Retrieved from City of Spokane > Projects: https://static.spokanecity.org/documents/projects/southhill/south-hill-coalition-adopted-plan.pdf

Spokane Regional Transportation Council (SRTC). (2021, December 9). *Horizon 2045 - Spokane Metropolitan Transportation Plan.* Retrieved from SRTC: https://srtc.org/wp-content/uploads/2025/02/Horizon2045_compressed.pdf

SRTC. (2025). *Metropolitan Transportation Plan - Horizon 2045*. Retrieved from https://srtc.org/our-work/core-plans-and-programs/metropolitan-transportation-plan/#2045

SRTC. (2022, July). *DivisionConnets Phase 2 Report: Vision and Implementation Strategy.* Retrieved from SRTC: https://srtc.org/wp-content/uploads/2025/02/DivisionConnects-Vision-and-Implementation-Strategy-Phase-2-Report_final2_compressed.pdf

SRTC; STA. (2021, May). *DivisionConnects Study Phase 1: Division Street Corridor Development Plan.* Retrieved from Spokane Regional Transportation Council: https://srtc.org/wp-content/uploads/2025/02/Corridor-Development-Plan_06102021_compressed.pdf

West Central Neighborhood. (2012, May). *West Central Neighborhood Action Plan.* Retrieved from Business Development > Neighborhood Planning: https://static.spokanecity.org/documents/projects/westcentral/west-central-action-plan-05-2012.pdf

WSDOT - Eastern Region Planning. (2022, Febuary 02). *West Plains Subarea Transportation Management Plan Phase 1 - US 2 Vicinity.* Retrieved from https://www.wsdot.wa.gov/publications/fulltext/GIS/US2/WPSA%20Phase%201%20Study%20Exec%20Summary%20Documentation%202022-02-02%20-%20FINAL%20DRAFT.pdf

WSDOT. (2025). *Final Outcomes / Practical Solutions*. Retrieved from Online Open Houses > West Plains Subarea Transportation Management Plan: https://engage.wsdot.wa.gov/west-plains-subarea-transportation-management-plan/final-outcomes-practical-solutions/

4.2.7 Transportation

City of Spokane. (2014). *Draft ADA Transition Plan, 2014–2019.* Retrieved from https://static.spokanecity.org/documents/about/spokanecity/accessibility/ada-transition-plans-draft.pdf (Spokane City)

City of Spokane. (2015, November 2). *Spokane Pedestrian Master Plan.* Retrieved from https://static.spokanecity.org/documents/projects/pedestrianplan/spokane-final-pedestrian-plan-adopted-2015-11-02.pdf (Spokane City)

City of Spokane. (2017). *Bicycle Master Plan.* Retrieved from https://my.spokanecity.org/projects/bicycle-master-plan/ (Spokane City)

City of Spokane. (2017). *Shaping Spokane: City of Spokane Comprehensive Plan, Chapter 4 – Transportation.* Retrieved from https://static.spokanecity.org/documents/shapingspokane/comprehensive-plan/chapter-4-transportation-v7.pdf (Spokane City)

City of Spokane. (2023, June). *2023 Vision Zero Action Plan.* Retrieved from https://static.spokanecity.org/documents/projects/vision-zero/vision-zero-action-plan-june-2023.pdf (Spokane City)

City of Spokane. (2024). *Bicycle Priority Network.* Engage Spokane. Retrieved from https://engage.spokane.gov/bicycle-priority-network (Engage Spokane)

City of Spokane. (2025). *Complete Streets Program (Spokane Municipal Code Chapter 17H.020).* Retrieved from https://my.spokanecity.org/smc/?Section=17H.020.040 (Spokane City)

Spokane Regional Transportation Council. (2021). *Horizon 2045: Metropolitan Transportation Plan for the Spokane Region.* Retrieved from https://srtc.org/our-work/core-plans-and-programs/metropolitan-transportation-plan/ (SRTC)

Spokane Regional Transportation Council. (2024). *Spokane Regional Safety Action Plan.* Retrieved from https://www.srtc.org/wp-content/uploads/2025/02/29478_SRTC_RSAP_v15_SMALL_081324_compressed.pdf (SRTC)

Spokane Regional Transportation Council. (2024). *Regional Priority Networks – Horizon 2045* [GIS dataset]. Retrieved from https://data-srtc.hub.arcgis.com/datasets/regional-priority-networks-horizon-2045 (SRTC Regional Data Hub)

Spokane Regional Transportation Council. (2025). *Spokane Regional Travel Demand Model,* Provided to the City of Spokane and Fehr & Peers for the Spokane 2046 Comprehensive Plan EIS.

Spokane Transit Authority. (2024). *Connect Spokane: A Comprehensive Plan for Public Transportation* (as amended 2024). Retrieved from https://www.spokanetransit.com/projects/comprehensive-plan/ (Spokane Transit Authority)

Spokane Transit Authority. (2025). *2026–2031 Transit Development Plan.* Retrieved from https://www.spokanetransit.com/projects/transit-development-plan/ (Spokane Transit Authority)

Spokane Transit Authority. (2025). *Division Street Bus Rapid Transit (BRT).* Retrieved from https://www.spokanetransit.com/division-street-brt/ (Spokane Transit Authority)

Washington State Department of Transportation. (2024). *Crash Data Portal.* Retrieved from https://remoteapps.wsdot.wa.gov/HighwaySafety/Collision/Data/Portal/Public/ (WSDOT Remote Apps)

Washington State Department of Transportation. (2023). *Freight and Goods Transportation System (FGTS) – Truck Corridors* [dataset and report]. Retrieved from https://gisdata-wsdot.opendata.arcgis.com/datasets/wsdot-freight-data-freight-and-goods-transportation-system-truck-corridors/about and https://wsdot.wa.gov/sites/default/files/2023-12/Freight-Report-FGTS2023.pdf (WSDOT Geospatial Open Data Portal)

Washington State Department of Transportation. (2025). *North Spokane Corridor (NSC) Major Project.* Retrieved from https://wsdot.wa.gov/construction-planning/major-projects/north-spokane-corridor (WSDOT)

Washington Traffic Safety Commission. (2024). *Data Dashboards.* Retrieved from https://wtsc.wa.gov/dashboards/ (Washington Traffic Safety Commission)

4.2.8 Public Services

Centers for Disease Control. (2022). *SVI Interactive Map*. Retrieved from https://www.atsdr.cdc.gov/place-health/php/svi/svi-interactive-map.html

Centers for Disease Control. (2025). *PLACES: Local Data for Better Health*. Retrieved from https://www.cdc.gov/places/index.html

City of Spokane. (2023). *City Curbside Solid Waste Collection Moves to 6 a.m.* Retrieved from https://my.spokanecity.org/news/releases/2023/12/29/city-curbside-solid-waste-collection-moves-to-6-am/

City of Spokane. (2025). *2025-2030 Citywide Capital Improvement Program*. Retrieved from https://static.spokanecity.org/documents/budget/2025/draft-2025-2030-citywide-capital-improvement-program.pdf

City of Spokane. (2017). *Capital Facilities Plan.* Retrieved from https://static.spokanecity.org/documents/shapingspokane/comprehensive-plan/appendix-c-v2.pdf

City of Spokane. (2022). *Spokane Parks and Natural Lands Master Plan.* Retrieved from https://static.spokanecity.org/documents/parksrec/master-plan/spokane-parks-and-natural-lands-master-plan.pdf

City of Spokane. (2025, August 27). *Citywide Capital Improvement Program 2026-2031, DRAFT.* Retrieved from https://static.spokanecity.org/documents/budget/2026/draft-2026-2031-citywide-capital-improvement-program.pdf

City of Spokane. (2025). *Officer*. Retrieved from Police Department: https://my.spokanecity.org/police/officer/

City of Spokane. (2025). *Spokane Police Department Strategic Plan 2025-2026.* Retrieved from https://static.spokanecity.org/documents/police/information/2025-2026-spd-strategic-plan.pdf

City of Spokane. (2025). *Waste to Energy*. Retrieved from https://my.spokanecity.org/solidwaste/waste-to-energy/

City of Spokane. (2025). *Solid Waste Services*. Retrieved from https://my.spokanecity.org/solidwaste/

MW Engineers. (2025). *Spokane Public Library Hillyard Library at Shaw MS*. Retrieved from https://www.mwengineers.com/portfolio/library-hillyard/

MW Engineers. (2025). *Spokane Public Library Liberty Park*. Retrieved from https://www.mwengineers.com/portfolio/spokane-library-liberty-park/

Revised Code of Washington. (2022). *RCW 28A.150.100*. Retrieved from https://app.leg.wa.gov/rcw/default.aspx?cite=28A.150.100

Spokane C.O.P.S. (2025). *About Us*. Retrieved from https://www.spokanecops.org/about-us

Spokane County. (2022). *Comprehensive Solid Waste and Moderate Risk Waste Management Plan (2022-2027)*. Retrieved from https://www.spokanecounty.gov/DocumentCenter/View/44215/Spokane-County-SWMP?bidId=

Spokane Fire Department. (2023). *2023 Spokane Fire Department Annual Report*. Retrieved from https://static.spokanecity.org/documents/fire/resource-library/annual-reports/2023-annual-report.pdf

Spokane Fire Department. (2024). *2024 Annual Report.* Retrieved from https://static.spokanecity.org/documents/fire/resource-library/annual-reports/2024-annual-report.pdf

Spokane Fire Department. (2025). *Fire Department*. Retrieved from https://my.spokanecity.org/fire/

Spokane Fire Department. (2025). *Fire Stations*. Retrieved from https://my.spokanecity.org/fire/operations/stations/

Spokane Police Department. (2024). *SPD 2023 Highlights*. Retrieved from https://my.spokanecity.org/police/news/2024/01/04/spd-2023-highlights/

Spokane Police Department. (2024). *SPD 2023 Highlights*. Retrieved from https://my.spokanecity.org/police/news/2024/01/04/spd-2023-highlights/

Spokane Police Department. (2025). *CompState NIBRS Report 07/14/2025*. Retrieved from https://static.spokanecity.org/documents/police/prevention/compstat/2025/07/compstat-report-2025-07-14.pdf

Spokane Public Library. (2022). *Imagine the Library of the Future*. Retrieved from http://future.spokanelibrary.org/

Spokane Public Library. (2024). *2024 Annual Report*. Retrieved from https://www.spokanelibrary.org/wp-content/uploads/25-001_Annual-Report-2024_Single.pdf

Spokane Public Library. (2025). *About Us*. Retrieved from https://www.spokanelibrary.org/aboutus/

Spokane Public Library. (2025). *All Locations and Hours*. Retrieved from https://www.spokanelibrary.org/locations-all?gad_source=1&gad_campaignid=20481966692&gbraid=0AAAAAqH-fguh8iOKPeSDwbMzMm_c7GZbw&gclid=EAIaIQobChMIgOiymZz3jgMVASatBh0ohSiREAAYASAAEgKRQvD_BwE

Spokane Public Schools. (2025). *2025 Bond*. Retrieved from https://www.spokaneschools.org/page/2025-bond

Spokane Public Schools. (2025). *Our District*. Retrieved from https://www.spokaneschools.org/page/our-district

The Lands Council. (2023). *URBAN FORESTRY- Spocanopy & coolcanopy.* Retrieved from The Lands Council: https://landscouncil.org/urban-canopy

The Spokesman Review. (2024). *Voters agree to tax for Spokane Public Library to maintain services*. Retrieved from https://www.spokesman.com/stories/2024/feb/13/voters-poised-to-give-spokane-libraries-funds-to-m/

Washington OFM. (2024). *Small Area Estimates*. Retrieved from https://ofm.wa.gov/washington-data-research/population-demographics/population-estimates/small-area-estimates-program

Washington OSPI. (2024). *OSPI Report Card - Spokane School District*. Retrieved from https://reportcard.ospi.k12.wa.us/ReportCard/ViewSchoolOrDistrict/100247

Urban Land Institute. (2025). *The Hive – ULI Americas Awards for Excellence Special Mention*. Retrieved from https://americas.uli.org/the-hive-uli-americas-awards-for-excellence-special-mention/

4.2.9 Utilities

Avista Corp. (2025). *2025 Electric Integrated Resource Plan.* Retrieved from: https://www.myavista.com/about-us/integrated-resource-planning

City of Spokane. (2023, February). *City of Spokane Water System Plan.* Retrieved from: https://static.spokanecity.org/documents/publicworks/water/draft-water-system-plan-feb-2023.pdf

City of Spokane. (2025). *2024 Combined Sewer Overflow (CSO) Annual Report*. Retrieved from: https://static.spokanecity.org/documents/publicworks/wastewater/cso/2024-annual-cso-report.pdf

5 Appendices

A Scoping and Public Outreach 5-3
B Transportation Analysis Zones Maps 5-4
C Transportation Project Implementation Table 5-11
D Utility Maps 5-13
E Environmental Review Exemptions to Promote Infill Development and Housing 5-2

A Scoping and Public Outreach

- Notice: Determination of Significance and Request for Comments on Scope of EIS
- Fact Sheet: Environmental Impact Statement Scoping Fact Sheet
- Visioning Engagement Summary: PlanSpokane Community Visioning Engagement Summary
- Future Growth and Guiding Policies Workshops: Future Growth and Guiding Policies Engagement Summary - PlanSpokane

City of Spokane Determination of Significance & Request for Comments on Scope of EIS (Environmental Impact Statement) for the City's Comprehensive Plan Periodic Update

Date of Issuance: February 5, 2025

Lead agency: City of Spokane, Department of Planning Services

Agency Contact: **Tirrell Black**, *Assistant Planning Director, Project Manager*, 509.625.6500
PlanSpokane@spokanecity.org

Description of Proposal

Spokane is preparing a periodic update to the City's Comprehensive Plan for 20 years, from 2026 to 2046. The City's Comprehensive Plan was last updated in 2017. The Comprehensive Plan helps the City manage growth, provide housing and job opportunities, plan for services and infrastructure (e.g. streets, stormwater, parks), and more.

Each chapter of the plan will be updated to address new growth targets for population and jobs, and to meet changes to the Growth Management Act (GMA) since 2017 including considerations around Climate Planning and Planning for Housing at all income levels.

The Land Use Plan Map may be amended to create more housing and job opportunities and respond to growth targets, community needs, transportation investments, and environmental conditions. Zoning and other development regulations may also be amended to implement the Land Use Plan Map. Critical area regulations would be evaluated and recent state planning rules would be addressed.

The City is considering tools to facilitate environmental review under the State Environmental Policy Act (SEPA) such as a planned action (RCW 43.21c.440) for subareas such as transit corridors or employment and mixed use centers, housing and infill development categorical exemptions (RCW 43.21c.229), or raising minor new construction thresholds (WAC 197-11-800(1)(c)).

Location of Proposal

The Comprehensive Plan primarily addresses the Spokane city limits. Secondarily the plan addresses unincorporated urban growth areas and utility service areas abutting the city.

Proponent

City of Spokane

EIS (Environmental Impact Statement) Required

The City of Spokane has determined that this proposal is likely to have a significant adverse impact on the environment. An environmental impact statement (EIS) is required under RCW 43.21C.030 (2)(c) and will be prepared. As lead agency, the City has identified the following areas for discussion in the EIS:

- Earth and water quality
- Air quality and greenhouse gas emissions
- Plants and animals
- Land use patterns and urban form
- Relationship to plans, policies, and regulations
- Population, employment, and housing
- Transportation
- Public services: police, fire and emergency medical services, parks, schools, and libraries
- Utilities: power, water, wastewater, and stormwater

The City is studying three alternatives. One alternative will be the No Action Alternative or the continuation of the current Comprehensive Plan and associated regulations. The No Action Alternative is SEPA required. In addition, two action alternatives would be evaluated to explore different ways the City can accomplish City objectives for a resilient, connected, and livable city. In addition to addressing Spokane's population and housing growth targets for the period 2026-2046, the action alternatives would consider new or expanded locations for neighborhood commercial services. Alternatives would also explore employment growth in existing or expanded centers as well as changes to land uses where there are new investments in transportation.

More information on the EIS process, as well as materials related to the Periodic Update may be reviewed on the project website: https://my.spokanecity.org/planspokane/about/.

Scoping

Agencies, affected Tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. The method and deadline for giving us your comments is shared below.

Written Comments: The comment period is open from **February 5, 2025 to April 7, 2025**. Please provide your comments between **8 am on February 5 and 5 pm April 7, 2025**.

Comments may be submitted two ways: (1) by email to **Tirrell Black**, *Assistant Planning Director,* PlanSpokane@spokanecity.org, with the subject line "Spokane EIS", or (2) by letter to:

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

Meetings: Opportunities to learn more and share your input on the periodic update and EIS scope include:

- Agency and Tribes Workshop: **Wednesday, February 19** from 9:30-12:30 at the Central Library, Events A Room
- District 1 Periodic Update Visioning/Scoping Workshop: **Wednesday, March 5** from 5:30-7pm at the Northeast Community Center, LL Main Room
- Community Periodic Update Visioning/Scoping Workshop: **Wednesday, March 12** from 12-1:30pm at the Central Library, Events A Room
- District 2 Periodic Update Visioning/Scoping Workshop: **Tuesday, March 25** from 5:30-7pm at the Liberty Park Library, Events Room
- District 3 Periodic Update Visioning/Scoping Workshop: **Thursday, March 27** from 5:30-7pm at the Shadle Library, Events Room

For additional information please see: https://my.spokanecity.org/planspokane/about/.

Responsible Official

Spencer Gardner, Director, Planning Services, City of Spokane, 808 W. Spokane Falls Blvd, Spokane, WA 99201, 509.625.6097, sgardner@spokanecity.org.

Signature: _____ Date: Feb 4, 2025

Appeal process: See SMC Section 17E.050.210.

PLANSPOKANE

Resilient | Connected | Livable | 2046

EIS Scoping Fact Sheet

Date: February 5, 2025

1 What is an EIS?

An Environmental Impact Statement (EIS) is an informational document that provides the City, public, Tribes, and agencies with environmental information to be considered in the decision-making process. An EIS is required under the State Environmental Policy Act (SEPA) for larger projects or for major plans, regulations, and programs. An EIS describes potential environmental impacts, reasonable Alternatives, and ways to avoid or minimize negative impacts that could result from implementation of the Comprehensive Plan. The EIS evaluation and mitigation measures would inform the Spokane Comprehensive Plan periodic update.

The public, Tribes, and agencies will be invited to provide comments on the Draft EIS. The Final EIS will include all comments received on the Draft EIS and responses from the City of Spokane. The Final EIS may include revisions to the Draft EIS based on comments received and new information learned. The Final EIS may also evaluate a Preferred Alternative developed in the range of the Alternatives examined in the Draft EIS.

2 What is the Spokane Comprehensive Plan?

A "comprehensive plan" is the name given to identify the community's long-range plan for growth and is required by the Growth Management Act (GMA). It provides guidance for all aspects of the city's growth and development over a long period, typically 20 years. The plan is made up of a vision, goals, policies, and implementation strategies that state how the city should grow physically, socially, and economically.

Spokane's Comprehensive Plan is the product of many, many people including hundreds of community members, the city Plan Commission, City Council and Mayor. The City's Comprehensive Plan was originally adopted in 2001 and last updated in 2017.

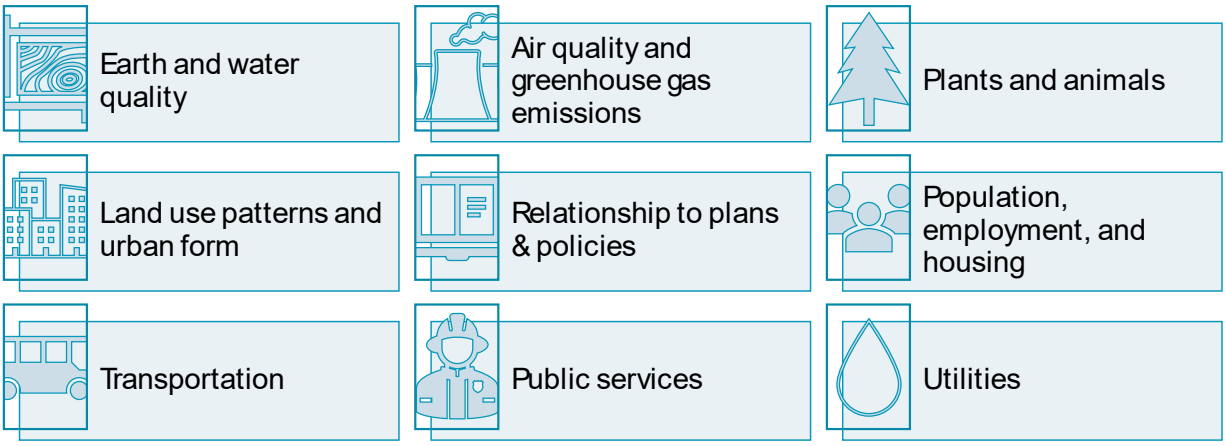
3 What is a periodic update?

Spokane is preparing a periodic update to the City's Comprehensive Plan for a new planning period of 2026 to 2046, called PlanSpokane 2046. A "periodic update" is the state's term for a full review of a Comprehensive Plan to make sure it is in conformance with any legislative changes to state law. Each chapter of the plan will be updated to address new growth targets for population and jobs, and to meet changes to the Growth Management Act (GMA) since 2017, including considerations around Climate Planning and Planning for Housing at all income levels.

The Land Use Plan Map may be amended to create more housing and job opportunities and respond to growth targets, community needs, transportation investments, and environmental conditions. Zoning and other development regulations may also be amended to implement the Land Use Plan Map. Critical area regulations would be evaluated and recent state planning rules would be addressed.

4 What topics will be evaluated in the EIS?

Natural and built environment topics proposed for study in the Comprehensive Plan Environmental Impact Statement (EIS) include those listed below. Each Alternative would be evaluated with these topics.



* police, fire and emergency medical services, parks, schools, and libraries
** power, water, wastewater, and stormwater

5 What Alternatives will be studied in the EIS?

An Environmental Impact Statement (EIS) is required to identify and analyze Alternative approaches to meeting the goals of a proposal. In the case of Comprehensive Plans, these "EIS Alternatives" represent different growth strategies. Alternatives should represent a diverse range of options that can highlight the impacts of different potential choices. The Alternatives should be broad enough that the final Preferred Alternative, which is included in the final plan, will fall within the range of the Alternatives studied.

The City anticipates studying three Alternatives in the Draft EIS described below.

- **No Action Alternative:** This State Environmental Policy Act (SEPA) required Alternative is the continuation of the current Comprehensive Plan and associated zoning and regulations. Growth would continue as planned under current rules. Under this Alternative, the Plan would not be updated.

- **Action Alternatives:** Two Action Alternatives will be evaluated in the Draft EIS. The Alternatives are under development and will explore different ways the City can both meet Growth Management Act (GMA) requirements and accomplish PlanSpokane 2046 themes to create a resilient, connected, and livable city. Public, Tribal, and agency input during the scoping process will help Spokane form the Alternatives for study in the EIS. Alternative features are anticipated to include:

    - Meet Spokane's population and housing growth targets for the period 2026-2046.
    - Consider new or expanded locations for neighborhood commercial services.
    - Explore employment opportunities in existing or expanded centers.
    - Consider changes to land uses where there are new investments in transportation.

A Final EIS would study a Preferred Alternative in the range of the studied Alternatives, potentially including components of all of the different Alternatives.

6 What is the schedule?

The City will match Growth Management Act (GMA) requirements for the periodic update schedule. Currently the City is planning to issue the Draft Environmental Impact Statement (EIS) in fall 2025 and the Final EIS in spring 2026. The City intends to integrate the State Environmental Policy Act (SEPA) and GMA process by issuing the Draft Plan and Draft EIS concurrently.

EIS Schedule – Tentative

7 When can I provide comments on the EIS?

The City is providing a 60-day comment window during the scoping period in the first quarter of 2025. See the **Determination of Significance and Scoping Notice** for how to provide your comments in writing or attend several workshop opportunities. The notice is available at: https://my.spokanecity.org/planspokane/about/.

The City will provide an additional comment period following release of the Draft Environmental Impact Statement (EIS). Additional information on dates and how to provide comment will be provided in the Draft EIS. Comments are accepted throughout the Periodic Update process – please see below on how to participate.

8 How can I participate in PlanSpokane?

The City of Spokane invites your participation.

- Visit the project website to learn about the PlanSpokane 2046 planning process,
- Subscribe to the PlanSpokane newsletter on the project website (https://my.spokanecity.org/planspokane/about/),
- Attend workshops, meetings, and hearings hosted by the City,
- Respond to surveys,
- Provide written comments, and
- Contact the Planning team at PlanSpokane@spokanecity.org or (509) 625-6500.

For more information, please see the project website: https://my.spokanecity.org/planspokane/about/.

PlanSpokane

Community Visioning Engagement Summary

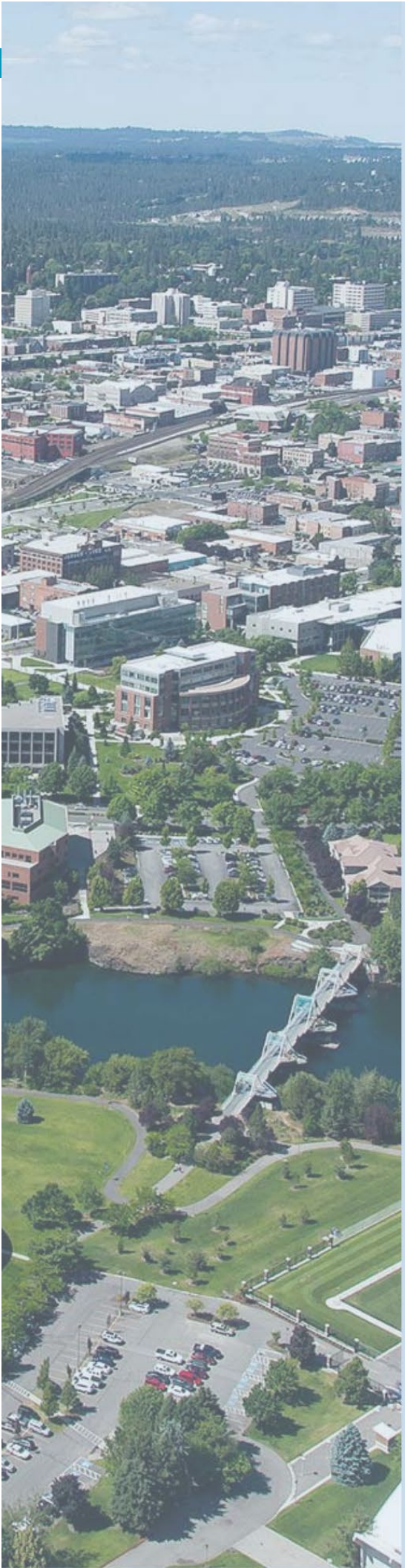
April, 2025

PLANSPOKANE

Resilient | Connected | Livable | 2046

Table of Contents

Executive Summary	3
Background	4
Vision Board	5
Community Visioning Workshop Series	6
Community Visioning Survey	9
Spring Market Visioning	11
Next Steps	11
Appendices	13
District 1 Memo	
District 2 Memo	
District 3 Memo	
Community-Wide Memo	



Community Visioning Engagement

EXECUTIVE SUMMARY

Over 300 community members provided insightful feedback for Spokane's future vision.

Feedback will help direct the PlanSpokane 2046 Periodic Update and inform the growth options of our city for the next twenty years!

COMMON THEMES :

NATURE

- Access to nature
- Sustainability and environmental stewardship
- Healthy and clean

COMMUNITY

- Welcoming and diverse
- Accessible
- Family-friendly
- Connected
- Human-centered
- Safe

INNOVATION

- Good jobs
- Culture and arts economy
- Cutting-edge
- New industries
- Reuse

LIVABLE

- Affordable
- Walkable and bike-friendly
- Access to neighborhood services
- Attractive

Background

The City of Spokane is commencing a periodic update to the City's Comprehensive Plan. A "periodic update" is the state's term for a full review of a Comprehensive Plan to make sure it's in conformance with any legislative changes to state law. The update also provides an opportunity to learn about any changes supported by the community.

What is a Comprehensive Plan?

A Comprehensive Plan is the community's vision for how the city grows and invests. It is mandated by state law requiring a "road map" for fast-growing cities, known as the Growth Management Act. Spokane must have a Comprehensive Plan to manage population growth, with goals that include reducing sprawl, supporting efficient multimodal transportation, protecting the environment, and many more. The Comprehensive Plan establishes a vision for the city – looking at a horizon of twenty years. It guides implementation through Capital projects, City programs, and regulations.

The City's first Growth Management Act compliant Comprehensive Plan was adopted in 2001 after a robust community engagement process. It is made up of 14 Chapters which include Housing, Land Use, Transportation, Neighborhoods, Capital Facilities, Natural Environments, and more. Minor annual amendments are processed most years, which primarily look at individual properties to adjust land use designations to meet project needs. Then, every ten years the City goes through a periodic update as required by the Growth Management Act, which takes a deeper look at the entire document. Spokane's last periodic update was in 2017, producing a plan called "Shaping Spokane".

The next periodic update is due in 2026, and is dubbed PlanSpokane 2046, as it is looking at the next twenty-year planning horizon. While regular updates have occurred, this will be the **first substantial update since the Comprehensive Plan was first adopted in 2001**. With the significant population growth and changing local factors Spokane has experienced since then, this update provides the community with an opportunity to reevaluate the vision. The goals of this update are to meet all state legislative requirements updated since 2017, incorporate community input around changing needs and wants, and to streamline the Plan to make it more user friendly.

Being the first substantial update since 2001, the City of Spokane has determined that this proposal is likely to have a significant and potentially negative impact on the environment. As such, an **Environmental Impact Statement (EIS)** is required under RCW 43.21C.030 (2)(c) and will be prepared as part of the PlanSpokane 2046 effort. The Determination of Significance is the first step towards updating the Comprehensive Plan to reflect visions, goals, and legislation to support Spokane's growth into 2046, and will provide insight into how to mitigate any potential impacts of future growth.

The first step of the EIS process is known as "scoping". Ultimately, the "scope" of the EIS identifies different ways the City can meet its goals for growth or put differently, **how to meet Spokane's**

envisioned future. A request for comment on the scope of the EIS was issued on February 5, 2025 and ran through April 7, 2025. Both before and during the scoping comment period, the City of Spokane Department of Planning and Economic Development provided opportunities for the community to be engaged in the process of identifying that future vision for Spokane's next twenty years.

Feedback received during the Vision Board, Community Visioning Workshop Series, Community Visioning Survey, and Spring Market Visioning are documented below and will help inform the Environmental Impact Statement and PlanSpokane 2046 update to the Comprehensive Plan.

Vision Board

Launched on January 9, 2025 and open for three months through April 10, 2025, the City of Spokane Vision Board provided an early opportunity for community members to share their future vision for Spokane. A vision board is a collection of images and words that inspire and motivate you to reach your goals. Looking towards the Periodic Update of Spokane's Comprehensive Plan, this vision board sought to identify the community's goals for Spokane for the next twenty years.

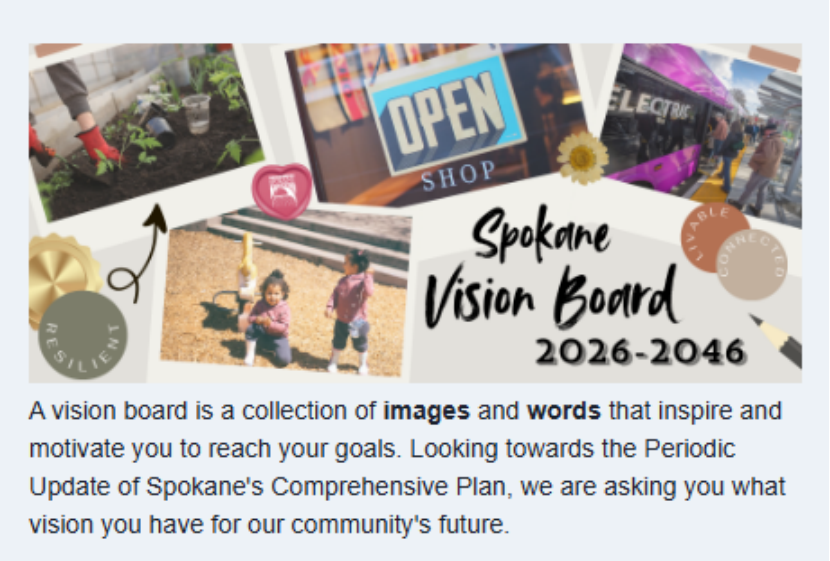


Figure 1. City of Spokane Vision Board was open from January 9, 2025 through April 10, 2025.

Of the 36 individual responses to the vision board activity, the common themes revolved around **nature and environmental stewardship**, **community connection**, **opportunities** for housing and jobs, improved **access to public spaces**. The list of responses can be found below.

A roof over every head	Human-centered urban planning
Dedicated dog parks	Make Spokane more walkable
Promote a mindset and local economy of recycling and upcycling	Increased public green spaces in all neighborhoods
Improved lighting on streets	Preservation of historic architecture
Conversion of residential arterials to boulevards	Build homeownership opportunities in infill housing
Ensure public access to school playfields	Rewild Spokane
A green, wet, and cool Spokane	A Spokane River regatta
Neighborhood signs and identify	Natural spaces preserved for wildlife
Pride in a cleaner city	Neighborhood historic character preserved
Wilderness in every neighborhood	Teach Peace
A welcoming Spokane to all people	End of the housing shortage

Children own the streets	No one feels alone
Good jobs with higher wages	People-oriented streets
Third places in every neighborhood (corner stores, coffee shops, etc.)	Property crime enforced and a greater feeling of safety
Promote home ownership over workforce housing	Spaces where bicyclists and pedestrians are protected from vehicles
An ability to age in place	Attainable and accessible housing for all
Inclusive and welcoming community that caters to the needs of everyone	Robust community gardens and sharing of local crops
Public art and cultural arts economic growth	Walkable and lively neighborhoods

Community Visioning Workshop Series

To further identify the community's desires for Spokane's future, the City of Spokane hosted a Community Visioning Workshop Series in March 2025. One workshop was held in each Council District, with one community-wide workshop located in downtown. Over 150 individuals attended one or more of the workshops, providing valuable feedback to help shape the vision and future policies of the Comprehensive Plan.

Figure 2. Community members participate in the District 2 Community Visioning Workshop.

These in-person workshops included discussion, mapping exercises, and feedback opportunities related to various aspects of the Comprehensive Plan and future growth options for the City. Each station sought reactions and comments on how community members envisioned the next twenty years of Spokane.

Station 1: Vision

The current City of Spokane Comprehensive Plan – Shaping Spokane – has unique vision statements for the majority of the chapters. This station aimed to receive feedback on the general future they envisioned for Spokane while also working towards the creation of a singular vision statement for the updated Comprehensive Plan that will allow all chapters to work towards the same future.

When asked to write down one word that describes their ideal future, community members provided the following themes:

Vibrant	Affordable
Walkable	Industries/Jobs
Safe	Resilient/Sustainable
Bike-Friendly	Attractive
Diverse	Dense

Art/Culture	Family-Friendly
Access to Nature/Green	Thriving
Community/Connected	Accessible
Inclusive/Diverse/Welcoming	Livable
Healthy	Cutting-Edge/Innovation

Having thought of their ideal future for Spokane, community members were asked to rank rough drafts of vision statements derived from the existing statements found in the Comprehensive Plan. Though similar, the different statements were intended to identify the phrasing and general direction for the new vision statement. The vision statements voted on were as follows:

Figure 3. A word cloud created from the existing vision statements in the Shaping Spokane Comprehensive Plan.

Staff Vision Rewrite A: More Collaborative

"Spokane will support its vibrant and inclusive neighborhoods by balancing livability, environmental stewardship, and economic vitality, while cherishing its unique cultural and natural assets. The city will ensure safe and efficient mobility, attainable housing, access to green spaces, neighborhood services, and a high quality of life for all residents through responsible planning and community partnership."

Staff Vision Rewrite B: More Active

"Spokane will foster livability, connectivity, and resiliency throughout the city by balancing economic vitality, environmental stewardship, and the diverse needs of residents, while cherishing its unique and vibrant neighborhoods. The city will ensure access to safe and efficient mobility, attainable housing, natural environments, and walkable neighborhood services to support a high-quality of life for all residents."

Staff Vision Rewrite C: Preserve Existing Traits

"Spokane is a livable, connected, and resilient city that balances the needs of its diverse residents, economic vitality, and environmental stewardship to support vibrant and inclusive neighborhoods that have access to safe and efficient mobility, attainable housing, green spaces, and services that result in a high-quality of life for all residents."

Statement B received the most votes with 33. Statement A came in a close second with 31 votes. Statement C received 20 votes.

When asked what may be missing from the rough draft statements, common themes were:

Arts and Culture	Safety/Safe Streets
Housing and Food Security	Acknowledgement of Tribal Sovereignty
Economic Mobility	Connected Community
Access to Nature	Pedestrian Focus

Station 2: Commercial Use Preference

Community members were asked to identify which commercial types they wanted to see more of throughout Spokane and within their neighborhood. Participants were asked to vote between convenience/groceries/big-box, restaurants, boutique stores, shopping/retail complex, pharmacies/clinics, mixed-use/ground-floor retail, neighborhood corner stores/cafes, and hotel/lodging. The top three selected uses were **neighborhood corner stores/cafes** (83 votes), **mixed-use/ground-floor retail** (79 votes), and **restaurants** (42 votes).

Figure 4. Community members participate in the District 3 Community Visioning Workshop.

Additional uses or considerations provided included childcare, senior housing, adaptive reuse of existing building, neighborhood groceries, community spaces, breweries, and bike repair/rentals.

Station 3: Your Spokane Mapping Exercise

Workshop participants were asked to indicate where they currently live, work, and play in Spokane to provide an understanding of who was providing comments and what areas in Spokane are currently appealing to its residents. The four workshops had a wide range of geographic input, with participants living and working throughout the city. District specific locations can be found in the attached appendices.

Comments were also received on initial thoughts about Spokane's current needs. Common themes included **increased walkability and bikeability**, **more frequent and expanded public transportation**, **fire and traffic management**, and **public meeting places**.

Figure 5. Community members participate in the District 2 Community Visioning Workshop.

Station 4: Your Future Spokane Mapping Exercise

Next, community members were asked to think about the future of Spokane. **Local businesses** and **job opportunities** were desired throughout Spokane, with specific locations identified during the

individual workshops found in the attached appendices. However, large retailers were only indicated to be desired in downtown and the North Hill Neighborhood.

Additional uses and considerations for Spokane's future included:

Community gardens	Increased fire infrastructure
Small grocery stores	More housing types (including senior housing)
Improved pedestrian infrastructure	Use of vacant properties
More natural areas and habitats	Improved transit services
Public community spaces	Balanced development (density + open space)

Station 5: Climate Ready Spokane

While the integration of climate and resiliency policies into the Comprehensive Plan is going through a separate engagement process to gather even more feedback about the community's experiences with climate hazards and their impacts, the visioning workshops provided an additional opportunity to reflect on ways to increase resiliency in Spokane. Specific mapped concerns or considerations can be found in the attached appendices for each workshop. Common themes to support resiliency were:

Provide more covered bus shelters	Provide electric car charging stations
Plant more trees	Increase public transit access
Reduce community water usage	Increase recycling
Further incentivize low-water landscaping	Improve walkability and bikeability
Fire management	Provide public education on resiliency

Station 6: What Did We Miss?

At the end of the workshops, community members were asked to document any other topic or theme that was missed, or any additional comments they wished to provide. Those comments can be found in the attached appendices. Larger concepts that the community wants to also be considered as part of the PlanSpokane 2046 update included **services for Spokane's unhoused residents**, **food policy**, **urban design**, **connectivity**, and **all-age and all-ability usability of the city**.

Community Visioning Survey

In order to provide a feedback opportunity for members of the community who were unable to attend one of the in-person workshops, an online Community Visioning Survey was launched. Though only open two weeks during the beginning of April to ensure feedback was timely and able to be included in the scoping process of the PlanSpokane 2046 effort, 64 responses were received that will help direct the scope of the Periodic Update.

Survey respondents were first asked what one word describes their ideal future for Spokane. Shared themes include:

Inclusive/Diverse	Prosperous
Sustainable/Nature/Conservation	Safe/Clean
Affordable/Housed	Accessible
Community	Walkable/Bikeable
Healthy	Family-Friendly
Vibrant	Resilient

When asked to rank the available draft vision statement (reference Station 1: Visioning section above), vision statement B was ranked the most preferred. 25 votes ranked the statement the most preferred and 22 votes ranked it second most preferred. Vision station A came in second.

Vibrant, walkable neighborhoods, environmental stewardship, balanced, and affordable housing were all concepts in the draft statements that stood out to respondents. Missing terms from the vision statements were also called out, including **accessibility**, **clean**, an emphasis on **safety**, leveraging **existing investment**, and **all-age amenities**. This feedback largely mirrors the preferences of the Community Visioning Workshop Series and will help shape the final vision statement of the PlanSpokane 2046 Comprehensive Plan.

Figure 6. Scout the Marmot encourages you to get involved in PlanSpokane 2046.

To better understand desired uses throughout Spokane's neighborhoods, the Community Visioning Survey also asked about opinions on commercial uses. The majority of respondents *agreed* in some capacity that they would like more **local businesses** and **job opportunities** within their neighborhoods. Conversely, the majority of respondents *disagreed* in some capacity that they would like more **larger retailers**. When asked to rank commercial uses, **neighborhood corner stores/cafes** ranked first, followed by **restaurants** and **groceries**.

When asked what other uses they would like to see in their neighborhood, survey respondents responded with:

Child Care	Affordable Housing/Accessory Dwelling Units
Safe Sidewalks/Walking Trails	Amenities in Parks
Professional Services	Community Spaces/Maker Spaces
Farmer's Markets/Community Gardens	Bike Shops
Access to Transit	Electric Charging Stations
Neighborhood Events/Art Walk	Fire Services
Mental Health Support	Memory-Friendly Public Spaces

Spring Market Visioning

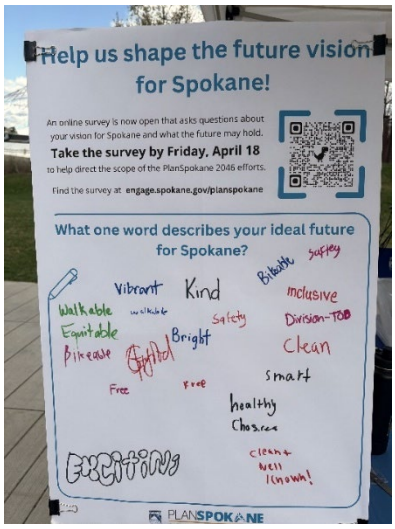


Figure 7. Comments received during the 2025 Spring Riverfront Market.

To wrap up the community engagement for the PlanSpokane 2046 visioning process, Planning staff attended the Spring Riverfront Market in early April to advertise the Community Visioning Survey and learn additional themes for Spokane's future. Approximately 50 community members attended the tabling booth to learn about the PlanSpokane 2046 project, Climate Planning efforts, and ongoing transportation projects.

Shared themes for Spokane's ideal future include:

Walkable/Bikeable	Equitable
Healthy	Safe/Clean
Well Known	Exciting/Vibrant

Next Steps

Feedback received during the visioning, or scoping, process will inform the next steps of the PlanSpokane 2046 effort. Based on the identified vision, potential "hows" of meeting that vision will be identified. These different ways that the City may grow, called Growth Alternatives, will be reviewed through the Draft Environmental Impact Statement. These Growth Alternatives look at different scenarios, like different job growth or different zoning and code allowances, and what impact those different scenarios may have on the environment and Spokane as a whole. Those impacts are compared and a Preferred Alternative, the selected "how" for getting to the future vision, will be selected. The Preferred Alternative, along with legislative requirements and document streamlining, will inform changes to the actual Comprehensive Plan document. Final adoption of the PlanSpokane 2046 Comprehensive Plan is expected in the later part of 2026.

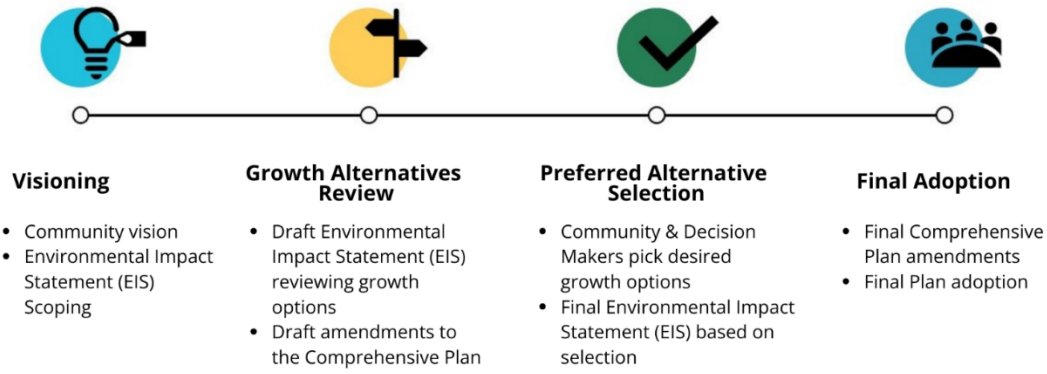


Figure 8. PlanSpokane 2046 process timeline

Community feedback will be accepted throughout the entire PlanSpokane 2046 process, from helping select the Preferred Alternative to weighing in on proposed goals and policies of the Comprehensive Plan.

We invite your participation:

- Visit the project webpage at PlanSpokane.org to learn more about the planning process
- Learn more about the Climate Planning efforts at my.spokanecity.org/climateplanning
- Subscribe to the PlanSpokane monthly newsletter to receive timely updates
- Attend future workshops, meetings, and hearings hosted by the City of Spokane
- Provide written comments or ask questions of the Planning team by emailing PlanSpokane@spokanecity.org

Appendices –

- District 1 Memo
- District 2 Memo
- District 3 Memo
- Community-Wide Memo

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Memo

Date: April 2, 2025

Re: **District 1 Visioning Workshop Engagement Summary**

The District 1 Visioning Workshop occurred on March 5 at the Northeast Community Center. Approximately 30 community members attended. Feedback received at each station activity is summarized below. A full visioning engagement summary will be developed at a later date.

Station 1: Vision Statement – One Word

Community members were asked to write down one word that describes their ideal future. The themes were:

- Community
- Resilient / Sustainable / Nature
- Affordable
- Walkable
- Innovation

Station 1: Vision Statement – Statement Ranking

Community members were asked to rank three similar vision statements based off themes found in the existing vision statement in the Comprehensive Plan. With 6 votes, vision statement B received the most votes: "Spokane will foster livability, connectivity, and resiliency throughout the city by balancing economic vitality, environmental stewardship, and the diverse needs of residents, while cherishing its unique and vibrant neighborhoods. The city will ensure access to safe and efficient mobility, attainable housing, natural environments, and walkable neighborhood services to support a high-quality of life for all residents."

When asked what was missing from the sample vision statements, the themes were:

- Investment
- All-age access
- Engage / Active voice
- Open spaces access
- Emphasis on non-personal vehicle transportation
- Historic connections

Station 2: Commercial Preference

Community members were asked to identify which commercial types they wanted to see throughout Spokane.

Neighborhood corner stores/cafes received the most votes, with 14.

Mixed-use/ground-floor retail came in second, with 10 votes.

Restaurants came in third, with 9 votes.

Additional uses/considerations provided included:

- Gathering places / Community meeting spaces
- Corner stores in walkable areas
- Evening / weekend childcare
- Reuse of small-scale commercial that's currently vacant

Station 3: Your Spokane Mapping Exercise

Community members were asked to indicate where they currently live, work, and play in Spokane. Participants indicated a wide array of areas in the city, showing geographic diversity in living, working, and leisure activities. Despite the range, there were more people who live in District 1. Downtown also contained a significant number of pins indicating work and favorite places.

Comments received focused on initial thoughts about Spokane's current needs:

- Hillyard needs transit
- River access is priority
- No good N-S bike route to E Sprague
- Need indoor aquatics facilities
- Lack of connectivity & services
- West of Latah/Hangman has equestrian activities

Station 4: Your Future Spokane Mapping Exercise

Community members were asked to think about the future of Spokane. Pins indicated a desire for more **local businesses** in Chief Garry (Napa and Sprague), Bemiss, Northwest, Balboa/South Indian Trail, Shiloh Hills, and North Indian Trail. More **job opportunities** were desired in North Indian Trail/Balboa and South Indian Trail.

Additional uses/considerations provided included:

- Focus on vacant / underutilized commercial, particularly in East Central and Chief Garry
- More accessible commercial on South Hill / Cliff Cannon
- Allow hotels in more areas, makes short term rentals less desirable
- More historic activities in every neighborhood
- Community meet-ups / gathering spaces
- Bakery in Hillyard
- Jobs near schools for high schoolers
- More grocery stores, food deserts (North Hill)
- More dense middle housing balanced with open space, trees, food gardens

- Safety concern for Mission bridge crossing
- Create a pedestrian friendly downtown
- More trees, more food forests, daylighting creeks
- Expand commercial along freeway
- More local businesses in all neighborhoods
- Mixed-use on arterials
- Recapture the spirit of Expo '74 and create a community-side festival focusing on the river
- Healthy food / neighborhood grocery
- Faster bus times
- North Indian Trail traffic calming
- Scattered site shelters

Station 5: Climate-Ready Spokane

Community members were asked to reflect on ways to increase resiliency within Spokane. Suggestions included:

- Empower the community to adopt lawn-less, water-less landscaping
- Incentivize low water lawns
- Bring back increased rates for high water users
- Advocate for shift away from natural gas for homes
- Need more neighborhoods with lots of services and housing choices
- Every bike lane should be a protected bike lane
- Provide subsidies for people purchasing an e-bike / other related purchases
- Ensure housing development incorporates non-vehicle transportation to reduce burden on roads

Community members also mapped specific concerns or considerations on a map of the City of Spokane:

- Fire danger and low fire response in N Indian Trail / 5-mile prairie
- Audubon / Downriver needs more bike/ped routes to services
- Need community / neighborhood resiliency hubs
- Help people replace wood / vinyl siding with more fire-resistant materials
- What is planned for potential Yellowstone pipeline issues?
- Need more trees in Bemiss, Logan, Mission, and the City in general
- Dead street trees need replaced
- Need bike crossings at major intersections (e.g. Division / Ruby)

Station 6: What Did We Miss?

Community members were asked to document anything topic or theme that was missed, or any additional comments they wished to provide. Those comments included:

- All-age and all-ability usability of the city
- Solution for homelessness / urban camping
- Security / safety
- Lighting for more public spaces to increase safety
- Access to safe / attractive route to bike to the library, school, high-frequency transit route for all housing
- Make downtown more pedestrian friendly
- City line is great, replicate and incorporate transit-oriented development
- Address existing car parking lots and car dealerships in downtown / underutilized land
- Not enough bus shelters and safe bus stops
- Buffering between railroads / freeways / industrial development and residential
- Arterials as boundaries for neighborhoods makes it harder to advocate for better bike / ped crossings on them (funding limiting within neighborhood boundaries)

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Memo

Date: April 2, 2025

Re: **District 2 Visioning Workshop Engagement Summary**

The District 2 Visioning Workshop occurred on March 25 at the Liberty Park Library. Approximately 45 community members attended. Feedback received at each station activity is summarized below. A full visioning engagement summary will be developed at a later date.

Station 1: Vision Statement – One Word

Community members were asked to write down one word that describes their ideal future. The themes were:

- Accessible
- Thriving
- Inclusive / Diverse
- Density
- Verdant / Sustainable
- Family-friendly
- Cutting-edge
- Safe / Clean
- Creative

Station 1: Vision Statement – Statement Ranking

Community members were asked to rank three similar vision statements based off themes found in the existing vision statement in the Comprehensive Plan. With 13 votes, vision statement A received the most votes: "Spokane will support its vibrant and inclusive neighborhoods by balancing livability, environmental stewardship, and economic vitality, while cherishing its unique cultural and natural assets. The city will ensure safe and efficient mobility, attainable housing, access to green spaces, neighborhood services, and a high quality of life for all residents through planning and community partnership." Vision statement C had 12 votes.

When asked what was missing from the sample vision statements, the themes were:

- Commitment to expanding public transportation / bike lanes
- Safe street for pedestrians / bicyclists
- Retain the elements that distinguish neighborhoods from each other
- Commitment to not only trees, but entire ecosystem

- Connection of Spokane to nature-based building solution
- Improving health of residents
- Economic mobility
- Access to nature
- Connected community / places to gather

Station 2: Commercial Preference

Community members were asked to identify which commercial types they wanted to see throughout Spokane.

Mixed-use/ground-floor retail received the most votes, with 32 votes.

Neighborhood corner stores/cafes came in second, with 28.

Restaurants came in third, with 18 votes.

Additional uses/considerations provided included:

- Public open space
- Small neighborhood grocery stores
- Parking with rooftop gardens
- Family-friendly businesses
- Alleys – require for new development, build new ones, improve existing alleys
- Preservation of green space
- Mixed-use neighborhood
- Ensure appropriate parking for all uses

Station 3: Your Spokane Mapping Exercise

Community members were asked to indicate where they currently live, work, and play in Spokane. Most participants indicated living in West Central / Chief Garry Park and south. Downtown also contained a significant number of pins indicating work, as well as East Central and Comstock. People's favorite places were in nearby State park lands, downtown, in local parks, and along the Centennial Trail / Spokane River.

Comments received focused on initial thoughts about Spokane's current needs:

- Plan for traffic in Cliff-Cannon, Vinegar Flats, along 29th, and generally within South Hill
- Support natural environment of Lincoln Park
- Unpaved roads within Hillyard
- Pavement improvements along heavy traffic routes
- Create partnerships to reduce homelessness
- Define what density means for Spokane / avoid comparisons to other cities

Station 4: Your Future Spokane Mapping Exercise

Community members were asked to think about the future of Spokane. Pins indicated a desire for more **local businesses** in Northwest, North Hill, West Central, East Central, Lincoln Heights, Cliff-Cannon, and Manito/Cannon Hill. More **job opportunities** were desired in Northeast Spokane, downtown in Riverside, East Central, and West Central. **Large retailers** were desired in downtown.

Additional uses/considerations provided included:

- Need more natural areas and habitats in East Central
- Neighborhood park needed in east of Lincoln Heights
- Mixed-use and arts development in Comstock near 37th and Grand
- Support native habitat / bird habitat in Lincoln Heights
- More transit routes / stops needed in Vinegar Flats, Magnolia and 5th, and near MLK Center
- Neighborhood Center in lower South Hill near 6th and 7th off Maple
- Mixed use in Lincoln Heights along 29th
- Create more indoor community activities during winter
- What is the future plan for cemeteries?
- Reduce front-facing parking lots along N Division St
- Possibility of "tunneling" section s of I90 to reduce separation of neighborhoods (e.g. between Maple and Freya)

Station 5: Climate-Ready Spokane

Community members were asked to reflect on ways to increase resiliency within Spokane. Suggestions included:

- Build more shade structures at parks and over play areas
- More covered bus stops
- Plant more trees
- Incentivize meadow lawns / emphasize Water Wise efforts
- Provide electric car charging stations
- Ensure public transportation is accessible to all new development / treat public transportation like a required utility

Community members also mapped specific concerns or considerations on a map of the City of Spokane:

- Expand greenways for pedestrian connectivity downtown
- Use less water / partner with schools and community gardens to reduce water usage
- Cliff Cannon lacks bus service and considerations for commercial traffic
- Enforce watering restrictions
- Create more resiliency hubs

- Protect tree health
- Improve access and mobility at Lewis and Clark High School
- Promote new infrastructure for clean electricity
- Increase recycling / reduce amount of garbage burned
- Fire concern over Spokanescape encouraging wood mulch groundcover

Station 6: What Did We Miss?

Community members were asked to document anything topic or theme that was missed, or any additional comments they wished to provide. Those comments included:

- Need more frequent and later bus times
- Keep park bathrooms open
- Create a plan to save assets e.g. open space / habitat / water resources
- Install automated recycling at WTEF to increase recycling to 66%
- Support more winter activities within city limits
- Plan for water health / conservation
- Food policy
- Support greater system of bike lanes and transit stops
- Aesthetics of the built environments – landscaping, art, design, open space
- Narrow streets for slower and safer streets
- Photo enforced speed cameras near District 2 public schools
- Support multi-family and mixed-use development
- Reduce parking
- Increase sidewalk network

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Memo

Date: April 3, 2025

Re: **District 3 Visioning Workshop Engagement Summary**

The District 3 Visioning Workshop occurred on March 27 at the Shadle Park Library. Approximately 37 community members attended. Feedback received at each station activity is summarized below. A full visioning engagement summary will be developed at a later date.

Station 1: Vision Statement – One Word

Community members were asked to write down one word that describes their ideal future. The themes were:

- Inclusive / Diverse / Welcoming
- Equity
- Sustainable / Green
- Fun
- Welcoming
- Thriving
- Livable
- Dense
- Bike-friendly
- Healthy
- Connected
- Affordable
- Safe
- Attractive

Station 1: Vision Statement – Statement Ranking

Community members were asked to rank three similar vision statements based off themes found in the existing vision statement in the Comprehensive Plan. With 12 votes, vision statement B received the most votes: "Spokane will foster livability, connectivity, and resiliency throughout the city by balancing economic vitality, environmental stewardship, and the diverse needs of residents, while cherishing its unique and vibrant neighborhoods. The city will ensure access to safe and efficient mobility, attainable housing, natural environments, and walkable neighborhood services to support a high-quality of life for all residents." Statement A came in second with 9 votes.

When asked what was missing from the sample vision statements, the themes were:

- Support for arts and culture
- Housing security
- Food security
- Safety
- Acknowledgement of Tribal sovereignty
- Conservation / preservation of natural spaces

Station 2: Commercial Preference

Community members were asked to identify which commercial types they wanted to see throughout Spokane.

Neighborhood corner stores/cafes received the most votes, with 27.

Mixed-use/ground-floor retail came in second, with 26 votes.

Restaurants came in third, with 10 votes.

Additional uses/considerations provided included:

- Senior housing (Audubon-Downriver, Northwest, Balboa, South Indian Trail)
- Reuse of history buildings prior to new development
- Community spaces
- Greenway or walking path connection Division to Garland District
- Neighborhood grocery (e.g. Downriver)
- Protected bike lanes

Station 3: Your Spokane Mapping Exercise

Community members were asked to indicate where they currently live, work, and play in Spokane. Participants primarily indicated living, working, and playing within District 3 boundaries. However, participants also worked in downtown, in Chief Garry Park, and Lincoln Heights in additional to concentration of employment in West Central. Favorite places included downtown as well, in addition to areas along Northwest Boulevard, in North Hill, and within natural areas like State park lands.

Comments received focused on initial thoughts about Spokane's current needs:

- More walkability, bike-ability, and access to transit
- Protected bike lanes
- Connect sidewalks and improve crossings on Northwest Boulevard
- Ash and Grace bus stop is dangers for school students
- Need bus access to medical district
- Address high speed cars / traffic calming
- Fire management needed
- Need transit access to natural areas
- Connect northern portions of Spokane to a bike network throughout the city
- Traffic considerations from new housing in North Indian Trail

Station 4: Your Future Spokane Mapping Exercise

Community members were asked to think about the future of Spokane. Pins indicated a desire for more **local businesses** throughout North Indian Trail, Balboa/South Indian Trail,

Northwest, Audubon/Downriver, West Central, Emerson Garfield, North Hill, and Nevada Heights. More **job opportunities** were desired in Balboa/South Indian Trail along Indian Trail Road and in North Hill. **Large retailers** were desired in North Hill.

Additional uses/considerations provided included:

- More industrial in the West Hills with a job focus
- Increased fire infrastructure in Latah Valley
- Small, locally owned grocery stores throughout, in West Central
- Various housing types within each neighborhood, including senior housing
- A walkable urban center for Shadle area with connections to the neighborhood
- Pedestrian infrastructure along Northwest Boulevard
- Protective bike lanes connection Garland / Monroe / Downtown
- Park in northeast corner of North Indian Trail
- Conversion of existing homes into cafes / small businesses
- Community gardens
- Yoga studio (North Hill)
- Main Street pedestrian mall with no cars downtown
- Incentivize use of land / do not let land sit unused / vacant
- Tall mixed-use development along Northwest Boulevard
- Increase bus service (Routes 22 and 23, Northwest Boulevard, Maple to Driscoll, throughout)
- Make Northwest Boulevard more walkable

Station 5: Climate-Ready Spokane

Community members were asked to reflect on ways to increase resiliency within Spokane. Suggestions included:

- Increase frequency and number of transit routes
- Water usage – use non-potable water for irrigation, make it easier to use rainwater, reduce lawn watering, increase fees
- Support low water and other Water Wise workshops
- Invest in natural areas
- Make neighborhoods more pedestrian friendly

Community members also mapped specific concerns or considerations on a map of the City of Spokane:

- Transit access needed to recreational areas
- Create bike friendly routes on Cedar Street from Francis to downtown
- More frequent transit / support Bus Rapid Transit / consider light rail
- Provide increased incentives for Spokanescape

- Prioritize pedestrian and alternative transportation for all development
- Northwest road resident with bike lanes
- Create safe crossing points on SR 291, current separates walking and biking pathways
- Provide more “essential stores” such as groceries and pharmacies in North Hill / Garland
- Crosswalks on Ash and Maple
- Connect Children of the Sun to Centennial Trail
- Increase tree plantings for canopy cover
- Fire mitigation along Sunset and Peaceful Valley
- Make Main Street pedestrian only / create pedestrian mall downtown
- Safer bike routes in South Hill / to Garland
- Protected bike lanes needed
- More fire infrastructure in Latah Valley
- Preserve natural areas around Thorpe area
- Increase watering restrictions
- Consider land value tax
- Drop city speed limit
- Bike route to Northwest and Driscoll

Station 6: What Did We Miss?

Community members were asked to document anything topic or theme that was missed, or any additional comments they wished to provide. Those comments included:

- Planning for a large community aquatics center
- Improve greenways by incorporating traffic calming measures

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Memo

Date: April 2, 2025

Re: **Community-Wide Visioning Workshop Engagement Summary**

The Community-Wide Visioning Workshop occurred on March 12 at the Central Library. Approximately 50 community members attended. Feedback received at each station activity is summarized below. A full visioning engagement summary will be developed at a later date.

Station 1: Vision Statement – One Word

Community members were asked to write down one word that describes their ideal future. The themes were:

- Industries / Jobs
- Affordable
- Walkable
- Safe
- Arts / Culture
- Diverse
- Resilient
- Dense
- Vibrant
- Multi Mobile / Good Public Transportation
- Robust
- Thriving
- Access to Nature
- Family-friendly

Station 1: Vision Statement – Statement Ranking

Community members were asked to rank three similar vision statements based off themes found in the existing vision statement in the Comprehensive Plan. With 9 votes, vision statement B received the most votes: "Spokane will foster livability, connectivity, and resiliency throughout the city by balancing economic vitality, environmental stewardship, and the diverse needs of residents, while cherishing its unique and vibrant neighborhoods. The city will ensure access to safe and efficient mobility, attainable housing, natural environments, and walkable neighborhood services to support a high-quality of life for all residents." Statement A came in second with 5 votes.

When asked what was missing from the sample vision statements, the themes were:

- Pedestrian focus
- Community support (e.g. financial literacy and housing classes)
- Enforcement of laws
- Focus on ownership to build personal stability and wealth
- Understood and defined solution to homelessness

- How to test the benefits of proposed changes

Station 2: Commercial Preference

Community members were asked to identify which commercial types they wanted to see throughout Spokane.

Neighborhood corner stores/cafes received the most votes, with 14. Comments indicated a desire for this use in South Hill, Cliff Cannon, Minnehaha, West Hills, and around Maxwell. Some community members noted a need for design standards with the use.

Mixed-use/ground-floor retail came in second, with 11 votes, with an emphasis of the use in Neighborhood Centers, Downtown, and around Maple and Francis.

Restaurants came in third, with 5 votes. There was a desire for this use on East 5th Avenue and along Mission Avenue.

Boutiques, convenience stores, groceries, and big-box stores all received 4 votes. Mission and Napa, as well as Downtown, were noted as desired areas for those uses. Downtown has an emphasis for groceries.

Additional uses/considerations provided included:

- Small scale hotels / lodging
- Corner stores near housing, grouped with other businesses, on every corner "where it makes sense"
- Bike repair & rental
- "more of everything in Latah Valley"
- Breweries
- Retain existing businesses

Station 3: Your Spokane Mapping Exercise

Community members were asked to indicate where they currently live, work, and play in Spokane. Participants indicated a wide array of areas in the city, showing geographic diversity in living and leisure activities. Downtown contained a significant number of pins indicating work. Favorite places included areas in State parks and other recreational areas, in downtown, Manito Park, libraries, and community centers.

Comments received focused on initial thoughts about Spokane's current needs:

- Create a hub on Northwest Boulevard near Audubon/Downriver and Emerson/Garfield border
- Bus route needed near Riverview Drive near Audubon/Downriver and West Hills border
- Need more small grocery store option in West Central

- Arts and culture events and places in West Central
- Infill development around 3rd
- Add retail / restaurants / mixed-use in University District

Station 4: Your Future Spokane Mapping Exercise

Community members were asked to think about the future of Spokane. Pins indicated a desire for more **local businesses** in Chief Garry, Nevada Heights, Minnehaha, Audubon/Downriver, Manito/Cannon Hill, East Central, and Latah/Hangman. More **job opportunities** were desired downtown in Riverside. **Large retailers** were desired downtown and Southgate.

Additional uses/considerations provided included:

- More retail in Whitworth
- More walkable bus routes throughout city / Route 28
- Small scale retail near and on Five Mile Prairie
- Support and improve existing development and infrastructure
- Encourage more use of transit / cycling / vanpools
- Small retail "like Garland" throughout, in West Central
- Avoid convenience stores
- Small / affordable grocery stores throughout
- Attract more employees to downtown to support downtown local businesses
- More businesses in western portion of Northwest
- Community gardens in East Central
- More South Hill retail due to low commercial vacancy
- Opportunity for mixed-use and pedestrian-oriented development in Lincoln Heights
- Latah / Hangman needs centers / corridors to provide services

Station 5: Climate-Ready Spokane

Community members were asked to reflect on ways to increase resiliency within Spokane. Suggestions included:

- Properties that use more water should pay more
- Do not require traditional landscaping for new construction
- Help get Spokane buildings off gas heat
- Considerations for how much water goes to Airway Heights
- Preserve green space in new developments
- Support walkability with accessible curb cuts, snow clearing
- Provide public education and awareness around low-water plants, landscaping, sustainable choices

Community members also mapped specific concerns or considerations on a map of the City of Spokane:

- Wildfire risk: Northwest and South
- Make it easier to make environment-friendly choices in north and center city
- Provide more green spaces and permeable surfaces throughout Division Street
- More density / housing in Five Mile Prairie
- Francis / Maple / Ash difficult to navigate via bike
- More trees in Hillyard / Northeast Spokane
- Conflict between street trees and sidewalks
- Concern over wood mulch promoted through Spokanescape due to fire risk
- Citywide leaf pickup
- Bike friendly routes on Highway 2

Station 6: What Did We Miss?

Community members were asked to document anything topic or theme that was missed, or any additional comments they wished to provide. Those comments included:

- No gentrification with growth
- Need small neighborhood grocery stores in downtown and in food desert areas
- Ensure continued development of East Central with green space and community gardens
- Grow Spokanescape program / increased use of Spokanescape on city-owned properties
- Maintain good job of listening to residents and departments working together
- Ensure changes are beneficial to city at large, not just those heard from
- Preserve positives in Spokane, don't change
- Increase transit access, connectivity, and frequency between neighborhoods
- Pedestrians and cyclist first policies
- East / west transit connectivity
- Rethink parking minimums
- More permeable surfaces
- All-age use of the city, including bike lanes (design focused on all-age use)
- New sidewalks need planting strip to create pedestrian separation

PlanSpokane

Future Growth and Guiding Policies Engagement Summary

December 2025

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Table of Contents

Background 3

Community Workshop Series 4

- Station 1: Guiding Policies 4
- Station 2: Displacement 5
- Station 3: Land Use Schema 6
- Station 4: Growth Alternatives 7
- Station 5: Map Your Future Spokane – Mixed-Uses 8
- Station 6: Map Your Future Spokane – Transportation 9
- Station 7: Planning for Climate 10
- Station 8: Developing Climate Policies 10
- Station 9: Environmental Justice 11
- Station 10: Prioritizing Climate Policies 12

Next Steps 12

Appendices 14

- District 1 Memo
- District 2 Memo
- District 3 Memo
- Community-Wide Memo
- Workshop Posters

Background

As part of the PlanSpokane 2046 Periodic Update to its Comprehensive Plan, the City of Spokane has been seeking public feedback on the City's next twenty years throughout 2025. While regular updates to the Comprehensive Plan have occurred, this will be the **first substantial update since the Comprehensive Plan was first adopted in 2001**. With the significant population growth and changing local factors Spokane has experienced since then, this update provides the community with an opportunity to reevaluate how they want the City to grow. The goals of this update are to meet all state legislative requirements adopted since 2017, incorporate community input around changing needs and wants, and to streamline the Plan to make it more user friendly.

What is a Comprehensive Plan?

A Comprehensive Plan is the community's vision for how the city grows and invests. It is mandated by state law requiring a "road map" for fast-growing cities, known as the Growth Management Act. Spokane must have a Comprehensive Plan to manage population growth, with goals that include reducing sprawl, supporting efficient multimodal transportation, protecting the environment, and many more.

The Comprehensive Plan establishes a vision for the city – looking at a horizon of twenty years. It guides implementation through Capital projects, City programs, and regulations.

Being the first substantial update since 2001, the City of Spokane has determined that this proposal is likely to have a significant and potentially negative impact on the environment. As such, an **Environmental Impact Statement (EIS)** is required under RCW 43.21C.030 (2)(c) and will be prepared as part of the PlanSpokane 2046 effort. The first step of the EIS process is known as "scoping". Both before and during the scoping comment period, the City of Spokane Department of Planning and Economic Development provided opportunities for the community to be engaged in the process of identifying the future vision for Spokane's next twenty years. The Community Visioning Engagement Summary provides a recap of the feedback heard.

Once the overall vision for the future is determined, the next step of the EIS process is to evaluate different ways the City can meet that vision while also accommodating future growth. To that end, the City of Spokane held a community workshop series on future growth and guiding policies in November 2025 for initial feedback on different ways the City of Spokane can grow, as well as the goals and policies to get us there.

More information about the PlanSpokane 2046 Periodic Update can be found at PlanSpokane.org

Community Workshop Series

At the beginning of 2025, community members provided invaluable feedback to create a 20-year vision for the City of Spokane. Since then, there has been ongoing work to identify different ways to reach that vision. To present the community with those options on how the City can grow, and receive feedback on goals and policies, a community workshop series on future growth and guiding policies was held in November 2025. One workshop was held in each City Council District, with one community-wide workshop held downtown. **Over 100 individuals attended** one or more of the workshops, providing valuable feedback to help shape the future of the City of Spokane.

Figure 1. Community members participate in the District 1 Community Workshop.

These in-person workshops included discussion, mapping exercises, and feedback opportunities related to various aspects of the Comprehensive Plan, including the new element of climate and resiliency. Each station sought reactions and comments on how community members wanted to shape the next twenty years. Kids activities and catered food was also available.

Station 1: Guiding Policies

After learning more about the PlanSpokane 2046 Periodic Update and Environmental Impact Statement process through informational posters, the first activity station revolved around the policies of the Comprehensive Plan and the current Chapter Review process. Community members were asked to identify what topics they want to make sure are addressed in the updated Comprehensive Plan to help identify potential gaps in the currently proposed amendments.

Themes from the four community workshops include:

Accessibility (housing, public spaces, “sittable” neighborhoods)	Address employment and job creation
Incentives to revitalize vacant properties	More “third places” for community connection
Bikeable streets, including protected bike lanes	Levels of service for fire safety
Art districts	Daycare centers and support
Address land speculation	Creating neighborhood identities
Indoor swimming pools	More greenways and trails
Incentives for affordable and mixed-use housing	Greater civic engagement, involvement, and transparency

Conservation/migration corridors and natural playgrounds	Create/support quality and beautiful places to live
Reduced dependency on single occupancy vehicles	Support for unhoused residents, including work programs
Context sensitive design standards	Sidewalk and pedestrian safety
Allow for more mixed uses in neighborhoods to support walkability, create local "hubs"	Coordination of road construction to prevent multiple roadway maintenance in the same direction

Station 2: Displacement

As part of the PlanSpokane 2046 Periodic Update to the Comprehensive Plan, the City of Spokane has completed analysis on racially disparate impacts and displacement risk to meet state legislative requirements (HB 1220). After being presented with the three different types of displacement – physical, economic, and cultural – community members were asked to help brainstorm causes of housing and small business displacement, as well as how the City of Spokane could address those causes.

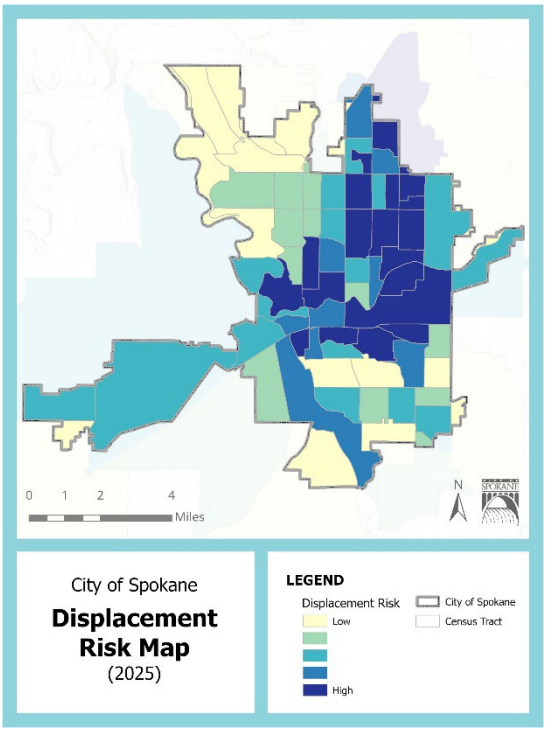


Figure 2. City of Spokane Displacement Risk Map from the Racially Disparate Impacts Analysis Report (2025).

Causes identified included **high housing costs** and **lack of housing inventory** to keep up with population increases, **mobile home parks being replaced**, businesses leaving and/or not having patrons due to **perception of safety** or **vandalism**, **lack of inclusive and accessible transit and public spaces**, **impact of taxes**, **buildings being demolished** for parking lots or shopping centers, **vacant or underutilized lots**, increase in housing **costs due to surrounding development**, **lack of pedestrian infrastructure**, **high insurance costs/losing property insurance** due to wildfire risk, **corporate rental ownership**, and **climate risks** (heat, lack of trees).

Potential actions to address the causes included **streamlining permit processing**, the **City being involved in public housing development**, **replacing existing housing with affordable multi-family housing**, **create supportive zoning** before development is expected to occur, **wildfire risk mitigation** (to address insurance issues), **rental costs management**, **increase transportation options** (pedestrian friendly streets/bus routes/road access), and **support community resiliency** to climate hazards.

Station 3: Land Use Schema

One aspect of the PlanSpokane 2046 Periodic Update includes updating the land use schema for the City of Spokane, with the goal of reducing the number of land use categories. Land use is essentially what kinds of uses can be built where, and community members were asked to provide feedback on the proposed land use categories: Urban Agriculture, Residential Low, Residential High, Commercial, Centers & Corridors, Institutional, Downtown, Industrial, and Open Space. Community members were asked what uses they would like to see in each proposed land use and where they should be located.

Urban Agriculture

- Allow flower growers, small vegetable and fruit farmers market-style food production
- Locate to avoid impacts of potential pesticides
- Preserve agriculture in the city by only allowing agricultural uses

Residential Low

- Ensure there is human-scale and human serving design, walkable third places, a transition between low- and high-density areas, and that the scale of residential and commercial uses match
- Allow parking, community gardens, small mixed uses (cafes, ice cream parlors, bookstores, medical uses like a dentist), indoor community pools, community gathering spaces, and professional offices
- Do not allow gas stations
- Create a process of neighborhood input on project-by-project basis for non-standard uses
- Develop incentives for neighborhood businesses
- Prioritize adaptive reuse over new development
- Locate near centers and corridors and other high intensity uses

Residential High

- Ensure accessible housing (no stairs)
- Expand into existing lower scale residential, such as near transit or in close proximity to amenities
- Have a minimum density

Commercial

- Expand mixed uses
- Leverage vacant commercial areas to add business or apartments
- Establish zoning requirements for gas stations/convenience stores related to sober living and other affordable housing services

Centers & Corridors

- Allow multi-unit housing and trade/live-work makerspaces
- Do not allow drive throughs, gas stations, convenience stores, hostile architecture, or single-unit homes

- Locate throughout Division once NS Corridor is complete and traffic reduces

Downtown

- Allow taller buildings and larger business spaces

Institutional

- Incentivize apartments
- Allow community pools

Industrial

- Encourage adaptive reuse of existing spaces

Open Space

- Allow undeveloped/natural parks with trails, mountain biking, indoor community pools
- Ensure enough parks/trails for those living in dense areas/apartments to have outdoor access, as well as accessible open spaces
- The full length of the Spokane River should be a public park
- Prioritize passive natural spaces

Station 4: Growth Alternatives

A significant result of the PlanSpokane 2046 Periodic Update and Environmental Impact Statement will be the selection of a Preferred Alternative – the desired direction for growth and prioritization for the City of Spokane's next twenty years. To identify that Preferred Alternative, the City must study different Growth Alternatives, which are different ways to address population growth, economic goals, and the community vision. More detailed analysis and comparisons will be available during the Draft Environmental Impact Statement public comment period expected to kick off in December 2025. This poster station allowed for an initial reaction to the potential options.

Figure 3. Community members participate in the District 2 Community Workshops.

Community members were presented with the three Growth Alternatives being evaluated as part of the PlanSpokane 2046 Periodic Update process. Alternative 1 (Stay the Course) represents the current growth strategy. To address recent state legislation, Alternative 2 (Distributed and Balanced) and Alternative 3 (Center City and Regional Hubs) were developed out of earlier visioning and scoping engagement. After reviewing the proposed maps and a snapshot of environmental impact evaluation comparisons between the three alternatives, community members were asked to vote on their preferred growth strategy.

Alternative 2 received the most votes with 25. **Alternative 3 came in second** with 7 votes. One vote selected a middle ground between Alternative 1 and Alternative 2. **Alternative 1 did not receive any votes** (presumably due to community understanding that it does not meet all state legislative requirements).

Rather than voting for a specific Alternative, most community members provided comments on the City of Spokane's future growth. The Preferred Alternative can be a combination of elements of the different Growth Alternatives, with these comments providing direction on what aspects were viewed positively from each alternative.

In general, community members liked the **interconnectedness of Alternative 2**, but also saw the benefit of the **Center City focus of Alternative 3** on businesses, community safety, and more housing. *Full comments can be found in the workshop-specific memos in the appendix of this summary.*

Station 5: Map Your Future Spokane – Mixed-Uses

Through a mapping exercise where different color pins represented different types of mixed-use designations, community members were asked to identify where they thought different sizes and scales of mixed-use development should be located throughout the City.

Figure 4. Mixed-use descriptions provided for the Map Your Future Spokane exercise. A higher resolution image can be found in the Workshop Posters appendix.

In general, **MU-TOD** was located along Division/Ruby, Market Street, Mission Avenue, North Monroe, near Shadle Library on Wellesley, in parts of downtown and Cliff-Cannon, Hamilton and the northernmost portion of Nevada Street, and in areas along 29th.

MU-1 was located in Hillyard, Nevada Heights just east of Division, the middle of Cliff-Cannon, north Five Mile Prairie, in parts of Audubon/Downriver and West Central, between Northwest and Balboa/South Indian Trail, North Monroe, near Shadle Library on Wellesley, and downtown.

MU-2 was located in Nevada Heights, the middle of Bemiss, adjacent to Chief Garry Park within the Chief Garry Park neighborhood, the northwest corner of Manito/Cannon Hill, north of Comstock, Shiloh Hills, Northwest, North Hill, along Indian Trail Road, and in areas along 29th.

MU-3 was located in the middle of Hillyard and Bemiss, multiple locations in Cliff-Cannon, on West Sunset Boulevard, Audubon/Downriver, Northwest, and along the edges of Manito/Cannon Hill.

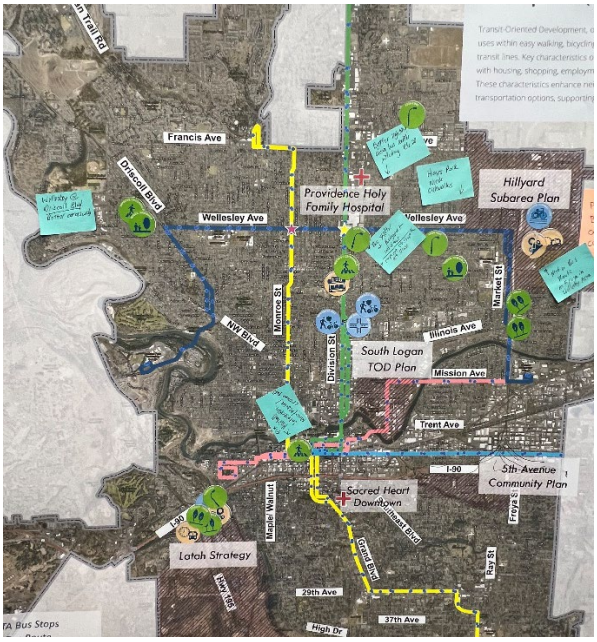
Additional comments about mixed-uses included:

Provide more uses in proximity to housing to reduce distance/need for transportation	Trade and makerspaces in West Central
There's currently a lack of affordable and larger retail near neighborhoods, not just small	Mobility connectivity for all modes in East Hillyard is a local priority
No more drive throughs	MU-2 should be everywhere
More intensity along arterials, transition to higher commercial, and then allow residential	No mixed-use in neighborhoods, concerned over exploitative development
Need a Latah-Cannon Corridor Plan to address traffic, 195 and I-90 ramp	Need parks and trails in Hillyard
More health and transportation access in West Central	Designated business district/center/corridor down east Broadway of West Central
Encourage trades academy	Support the creation of 24-hour daycare
Increase pedestrian/bike infrastructure along Northwest Boulevard	Create protections against displacement in Chief Garry Park around City Line stops, including increasing resources for community

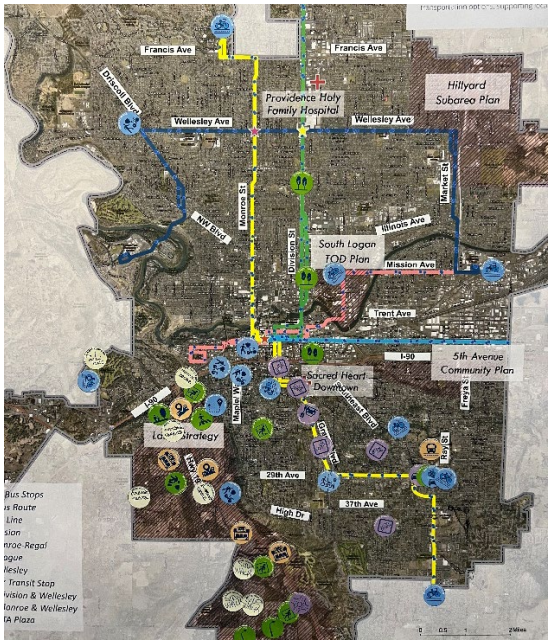
Station 6: Map Your Future Spokane – Transportation

Through a mapping exercise to indicate preferred development types and street upgrades, community members were asked to identify what type of street improvements they want to see along major transit stops, with street trees and greater connectivity being consistent themes. *Full summaries can be found in the workshop-specific memos in the appendix of this summary.*

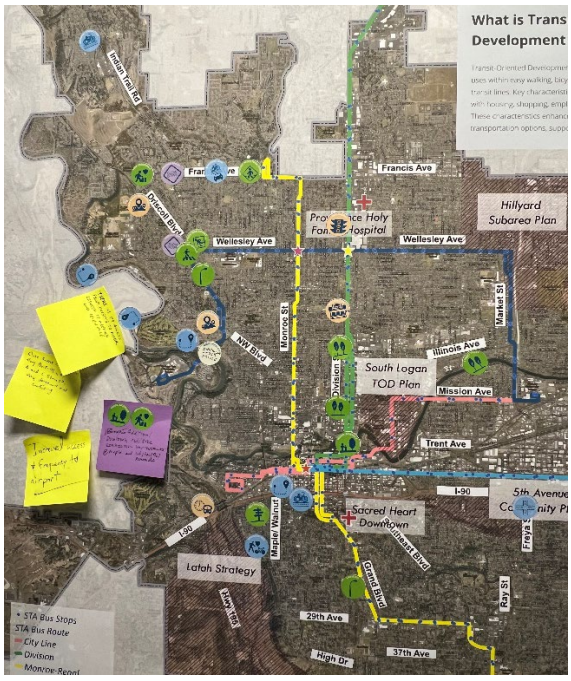
District 1



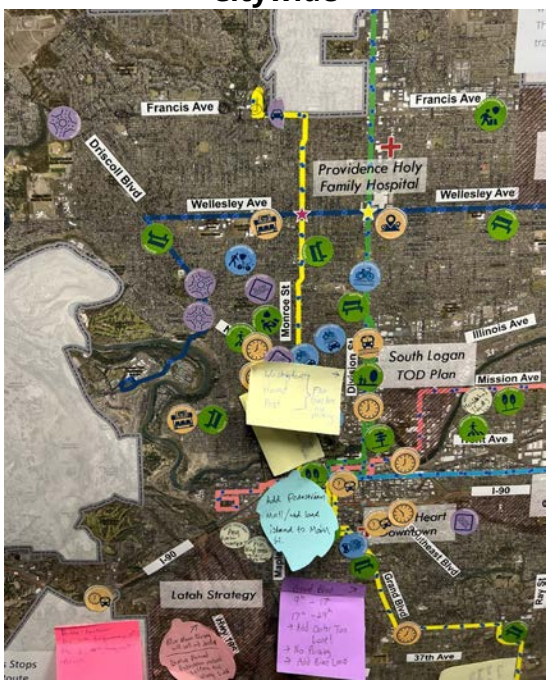
District 2



District 3



Citywide



Station 7: Planning for Climate

Another significant component of the PlanSpokane 2046 Periodic Update is the integration of climate and resiliency policies into the Comprehensive Plan to align with recent state legislation. Climate Planning efforts have been ongoing, with this workshop series providing an opportunity to bring all elements of the update together for community input. Workshop attendees were first asked to identify what actions they want the City of Spokane to take to support local climate resiliency.

Key themes from the feedback include **tree canopy** expansion and protection; **resilient and equitable development**; climate resilience **education and community engagement**; **water conservation** and **quality**; **energy efficiency** and **weatherization**; **reducing car reliance**; **air quality** and **pollution reduction**; **fire safety** and **mitigation**; access and preservation to **natural spaces**; and **housing and infrastructure**.

Station 8: Developing Climate Policies

In order to help develop climate and resiliency policies, community members were presented with top themes heard throughout the earlier phase of climate planning engagement, including wildfire smoke and extreme heat, water conservation, human health, food systems, tree canopy and green spaces, transportation and infrastructure, education, collaboration, and financial barriers. With those in mind, participants were then asked to identify any other topics of importance.

Topics identified include:

Address financial barriers	Food security
Do not exclude businesses from SpokaneScape program	Local community solutions to address climate hazards and resiliency
Greater bike infrastructure and connectivity	Impact of Artificial Intelligence
Increased shade	Water conservation
Convert unused city property to green spaces	Walkable neighborhoods
Indoor spaces to escape to during weather extremes	More resources directed to conservation programs
Trees and native landscaping, including potential for fruit trees as street trees	Support creation of more efficient building construction
Balance between infill development and trees	Active role of City in tree planting programs
Green infrastructure/swales	Education programs to support local resiliency
Mental and physical health	Intersection of natural and built environment
Protect mature trees and iconic basalt rocks	Increase accountability, including for businesses
Require parking	Maintenance of street trees
Incentives for tree planting in the north of the city	Weatherization/support new windows for historic homes
Recognition of limits to growth	"Dead internet" greenhouse gas emissions
Restrict wood burning fireplaces to improve air quality	Adjust development requirements to allow more room for trees
Growth numbers should consider possibility of climate refugees	Faster and cheaper transit (including through bus-only lanes and in Latah Valley)

Station 9: Environmental Justice

Environmental justice, as defined by state law, means the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to development, implementation, and enforcement of environmental laws, regulations, and policies. It includes addressing disproportionate health and environmental impacts. Community members were presented with the definition and ways to assess environmental justice, in order to support state required policies within the Comprehensive Plan.

Figure 5. Community members participate in the District 3 Community Workshops.

Workshop attendees were then asked to provide ideas on how the City of Spokane can support environmental justice. Key themes included supporting a **safe and connected transportation**

system that does not rely on single-occupancy vehicles, **targeting heat mitigation and resiliency** to vulnerable populations, **expanding green infrastructure** and tree canopy, **neighborhood investment without displacement**, and **City-funded resiliency investments** that support impacted neighborhoods and communities.

Station 10: Prioritizing Climate Policies

In addition to identifying potential climate and resiliency policies, the climate planning effort will include a prioritization process, which will help ensure that selected policies can be implemented and align with state requirements. Presented with the options of Resilience, Equity, Climate Pollution Reduction, Logistics, and Risk, community members were asked to identify the criteria they believed should be weighted more heavily than others.

Figure 6. Community members participate in the Citywide Community Workshops

Resilience came in first, with 21 votes, followed by **Equity** (16 votes) and **Climate Pollution Reduction** (15 votes). **Logistics** received 8 votes, while **Risk** had a total of 4 votes.

In addition to what was listed, community members were then asked to identify any other criteria that should be considered:

Build equity into each criterion	Legislative control to create solutions
How to reduce homelessness/outdoor sleeping to make people less vulnerable	Prioritize policies with City action rather than informational or "encouraging" resident action
Emphasize natural environment as a component of resilience criteria	Without resilience, we will have a hard time delivering on the other policies
Improvement to tree canopy	Clear out underbrush in fire risk areas
Inequitable impact of policy	Banning of wood burning fireplaces
Balancing costs and benefits to ensure prospective business ventures aren't impacted	Spreading out of affordable housing, "stop consolidating poverty"
Tighten controls on vehicle emissions	Allowing for shelters near services

Next Steps

Feedback received during the community workshops on future growth and guiding policies will inform amendments to goals and policies in the Comprehensive Plan, as well as discussion around the chosen growth strategy (or Preferred Alternative) for Spokane's next twenty years. Community members will have the opportunity to take a deeper dive into the details of and comparisons

between the Growth Alternatives after the release of the Draft Environmental Impact Statement (EIS) in December 2025, which will include a formal public comment period. More information about the Draft EIS will be available at PlanSpokane.org upon release. Final adoption of the PlanSpokane 2046 Comprehensive Plan is expected in the later part of 2026.

Figure 7. PlanSpokane 2046 process timeline

Community feedback will be accepted throughout the entire PlanSpokane 2046 process, from helping select the Preferred Alternative to weighing in on proposed goals and policies of the Comprehensive Plan.

We invite your participation:

- Visit the project webpage at PlanSpokane.org to learn more about the planning process
- Learn more about the Climate Planning efforts at my.spokanecity.org/climateplanning
- Subscribe to the PlanSpokane monthly newsletter to receive timely updates
- Attend future meetings and hearings hosted by the City of Spokane
- Provide written comments or ask questions to the Planning team by emailing PlanSpokane@spokanecity.org

Appendices –

- District 1 Memo
- District 2 Memo
- District 3 Memo
- Community-Wide Memo
- Workshop Posters

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Memo

Re: District 1 Future Growth and Guiding Policies Community Workshop

The District 1 Future Growth and Guiding Policies Community Workshop occurred on November 12, 2025 at Yasuhara Middle School. **Approximately 22 community members attended.** Feedback received at each station activity is summarized below. A full engagement summary of the workshop series will be developed at a later date.

Station 1: Guiding Policies

Community members were asked to write down what topics they want to make sure are addressed in the Comprehensive Plan to help identify potential gaps in the proposed amendments:

- Move civic engagement
- More districts for city council members
- More government transparency
- Incentives for empty properties on Division following BRT implementation
- More third places
- Continue partnerships with housing services and neighborhood councils
- Bikeable streets.

Station 2: Displacement

After being told about three different types of displacement (physical, economic, and cultural), community members were asked what causes to housing and small business displacement are they most concerned about. Additionally, how could the City address them?

The comments included:

- Consider the impacts of housing costs because of Division BRT.
- Get ahead of zoning along the corridor for middle/multi-unit housing.

Station 3: Land Use Schema

Community members were asked to provide feedback on proposed land use designations to implement the future growth of the Spokane. Specifically, they were asked what uses

should be allowed in the different land uses and were should the land use be located. Participants reflected on the following land uses:

- Residential Low:
    - Allow professional office
    - Allow MU-3 uses (like The Scoop)
- Residential High:
    - Have minimum density
- Centers and Corridors:
    - Do not allow single-unit homes
- Open Space:
    - Include intentional passive recreation

Station 4: Growth Alternatives

Community members were presented with the three Growth Alternatives being evaluated as part of the PlanSpokane 2046 Periodic Update process. Alternative 1 (Stay the Course) represents the current growth strategy. To address recent state legislation, Alternative 2 (Distributed and Balanced) and Alternative 3 (Center City and Regional Hubs) were developed out of earlier visioning and scoping engagement. After reviewing the proposed maps and a snapshot of environmental impact evaluation comparisons between the three alternatives, community members were asked to vote on their preferred growth strategy. Alternative 1 received 0 votes, Alternative 2 received 5 votes, and Alternative 3 received 1 vote.

Participants who did not fully prefer one alternative over another, as well as those who did make a selected, were asked to identify their likes and dislikes of potential growth options, as well as other considerations for future growth. Those comments included:

- Evacuation routes need for Latah Valley area/Vinegar Flats
- Distribute growth to remove silos between neighborhood and connected the community.
- Capitalize on larger roads to connect centers and places people visit
- Address Division BRT fully in Alt. 2 and 3.
- Require parking for large housing developments to be located within garages/parking structure.
- Turn parking lots into garages for a better use of land, especially around gathering places (e.g. arena).
- Build up, two story buildings waste land potential
- Have services in all areas of the city.
- Lack of ability to make left turns on Division can cause vacant lots/lack of businesses/patrons.
- Alternative 2 seems to be a natural approach to what will likely occur naturally.
- Vinegar Flats has a potential for job growth (mini Hillyard).

- Vinegar Flats is separate from Latah Valley area and should be treated as having different potential
- Build up, not out; focus on downtown and where growth already exists.
- Base Latah Strategy on infrastructure findings for connectivity.

Station 5: Map Your Future Spokane – Mixed-Uses

Through a mapping exercise where different color pins represented different types of mixed-use designations, community members were asked to identify where they thought different sizes and scales of mixed-use development should be located throughout the City. In general, respondents wanted respondents wanted MU-TOD along Division; MU-1 in Hillyard, Nevada Heights just east of Division, and in the middle of Cliff-Cannon; MU-2 in Nevada Heights, the middle of Bemiss, adjacent to Chief Garry Park within the Chief Garry Park neighborhood, the northwest corner of Manito/Cannon Hill, and the north of Comstock; MU-3 in the middle of Hillyard and Bemiss, the southeast corner of Bemiss, multiple locations in Cliff-Cannon, and along the edges of Manito/Cannon Hill.

In addition to pin placement, addition comments included:

- Make transportation less required (most uses in close proximity to households)
- Lack of affordable and larger retail near neighborhoods, highlighting Bemiss
- Mobility connectivity for all modes in East Hillyard is a local priority

Station 6: Map Your Future Spokane - Transportation

Through a mapping exercise that included stickers that indicated preferred development types and street upgrades, community members were asked to identify what type of street improvements and destinations they want to see along major transit stops throughout Spokane. In general, community members indicated wanting improved crosswalks and wider sidewalks along Northwest Boulevard; street trees, lighting and faster bus times around Vinegar Flats; improved crosswalks Downtown; more street trees on Market Street; separated bike lanes, improved crosswalks, lighting, and bus shelters along Division between the Ruby interchange and Wellesley; lighting and wider sidewalks in the Logan neighborhood, south of Wellesley; and improved bike connections and faster bus times in Hillyard.

In addition to sticker placement, addition comments included:

- Better crosswalks on Wellesley at Driscoll Boulevard
- Better lighting along bus routes including Route 28
- Hays Park needs sidewalks
- Bus shelter at Bridgeport and Glass

- Improve crosswalks at Glass
- Need a bus route on Freya in Wellesley area
- Fix Hairball intersection at Main/Monroe/Spokane Falls
- Pedestrian bridge is needed on Rowan to cross NSC
- Bridgeport near Division, people park half on sidewalk and half on street
- Fire access at Euclid into Minnehaha needs to be improved

Station 7: Planning for Climate

Community members were asked to identify what actions they want the City of Spokane to take to support local climate resiliency. Those comments included:

- Facilities and accommodations for dogs/pets.
- More shade on sidewalks.
- Reduction of VMTs through denser housing and more walkability.
- Locally fund ore SpoCanopy.
- Increase LOS for active transportation, reduced LOS for cars.
- More shade on trails and bus stops.
- Non-shaded areas and sidewalks are a burn risk for kids (toys, slides, etc.).
- Water conservation should not be focused just on residents.
- More fuel reduction in WUI areas.
- Continue tree canopy program.
- More QR codes around town (like parks) so people can get connected to information.
- Less black asphalt that raises heat, more white concrete.
- More sidewalk connectivity.
- More spending on education on water usage information.
- Removed trees need to be replanted in that area (not elsewhere in the City).
- Areas with lower tree canopy need higher tree requirements.
- More lawn alternative promotion, not just SpokaneScape.
- New Hillyard there are big oil tanks that burp oil smells into homes, cause air quality issues.
- Make the things that have and have not worked known; tell residents about known issues.
- More mail fliers of education, not just online.
- More education on fire wise and fuel reduction programs the City is already doing.
- Install solar panels over parking lots.

Station 8: Developing Climate Policies

In order to help develop climate and resiliency policies, community members were presented with top themes heard throughout the earlier phase of climate planning engagement. With those in mind, participants were then asked to identify any other topics of importance:

- Trees:
    - Require in new development
    - Leave existing trees in new development
    - Active City involvement in tree planting (don't require residents to request trees, ask them if they want trees)
- Oversight of street trees to support maintenance and growth to ensure trees live
- Swales

Station 9: Environmental Justice

Community members were presented with the definition and ways to assess environmental justice, in order to support state required policies within the Comprehensive Plan. Participants were then asked to provide ideas on how the City of Spokane can support environmental justice:

- Connect bicycle network and make e-bike traffic less dangerous.
- Expand the transportation network for bike and pedestrian connectivity.

Station 10: Prioritizing Climate Policies

In addition to identifying potential climate and resiliency policies, the climate planning effort will include a prioritization process. Community members were asked to identify the top criteria they believed should be weighted more heavily than others. Resilience received 1vote, Equity received 1 vote, Climate Pollution Reduction received 1 vote, Logistics received 1 vote, and Risk received 1 vote.

Community members there then asked to identify any other criteria that should be considered:

- Prioritize policies with city action rather than informational or "encouraging" resident action.
- Improvement to tree canopy (increase oversight and assistance, reduction of water costs to water trees, tree health support)

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Memo

Re: District 2 Future Growth and Guiding Policies Community Workshop

The District 2 Future Growth and Guiding Policies Community Workshop occurred on November 5, 2025 at Ferris High School. **Approximately 40 community members attended.** Feedback received at each station activity is summarized below. A full engagement summary of the workshop series will be developed at a later date.

Station 1: Guiding Policies

Community members were asked to write down what topics they want to make sure are addressed in the Comprehensive Plan to help identify potential gaps in the proposed amendments:

- Don't use broad terms in Comprehensive Plan
- Levels of service, especially for fire

Station 2: Displacement

After being told about three different types of displacement (physical, economic, and cultural), community members were asked what causes to housing and small business displacement are they most concerned about. Additionally, how could the City address them?

The comments included:

- Affordable Housing
- Address vandalism to support businesses
- Concerned about gangs for both housing and small businesses
- Lack of pedestrian infrastructure and transit
- High insurance for homes in the WUI, mitigate wilfire risk
- Corporate rental ownership
- Tree desert/heat island in certain neighborhoods
- Increase tree canopy
- Codes that require solar cooling
- Control rents
- Increase bus routes
- Create more pedestrian friendly streets
- Build roads before new development
- High housing costs

- Losing property insurance
- City should work with the State on housing costs and insurance loss

Station 3: Land Use Schema

Community members were asked to provide feedback on proposed land use designations to implement the future growth of the Spokane. Specifically, they were asked what uses should be allowed in the different land uses and were should the land use be located. Participants reflected on the following land uses:

- Urban Agriculture:
  - Preserve, no other use allowed.
- Residential Low:
  - Allow businesses catered toward people walking
  - Allow neighborhood input on a project-by-project level for other uses
  - Allow coffee shops, gathering spaces, and bookstores
  - Develop incentives for neighborhood businesses
  - Prioritize historic/adaptive reuse over new development (both commercial and residential)
  - Commercial and residential can coexist as long as the scale and auto vs pedestrian uses match each other in intensity.
  - Locate near centers and corridors and other high intensity uses.
- Commercial:
  - Zoning requirements for gas stations and convenience stores related to sober living and other affordable housing services.
- Centers and Corridors:
  - Do not allow drive-thrus, gas stations or any other auto-oriented uses.
- Open Space:
  - Should include parks and natural open space.
  - Preserve open space.
  - Protect trees during development, including on private property.

Station 4: Growth Alternatives

Community members were presented with the three Growth Alternatives being evaluated as part of the PlanSpokane 2046 Periodic Update process. Alternative 1 (Stay the Course) represents the current growth strategy. To address recent state legislation, Alternative 2 (Distributed and Balanced) and Alternative 3 (Center City and Regional Hubs) were developed out of earlier visioning and scoping engagement. After reviewing the proposed maps and a snapshot of environmental impact evaluation comparisons between the three alternatives, community members were asked to vote on their preferred growth strategy. Alternative 1 received 0 votes, one vote was cast for a middle option between Alternative 1 and Alternative 2, Alternative 2 received 6 votes, and Alternative 3 received 2 votes.

Participants who did not fully prefer one alternative over another, as well as those who did make a selected, were asked to identify their likes and dislikes of potential growth options, as well as other considerations for future growth. Those comments included:

- Direct growth to Garland/Perry/Downtown/areas already with growth and not within neighborhoods with limited parking and emergency access.
- Direct growth away from mature trees and rock formations.
- Distributed housing and transportation needed.
- Alternative 2 & 3 should both focus on TOD and increased affordable housing.
- Large subdivisions should have traffic lights to exit to accommodate surrounding growth.
- Duplexes built and sold as duplexes are not selling/not affordable; concerns over affordable housing in alternatives.
- Parking requirements should be 1 space per unit.
- Need safe crossings to bus stops/park and rides.
- High intensity housing can be isolating, community hubs are needed.
- Increase housing downtown; get more people visiting downtown.
- Locate mix-use along NS Corridor interchanges.
- Address Airway Heights growth impact on access to water.
- Concerns over Division traffic and conflict of businesses, curb cuts.
- Infrastructure needs to be in place before continuing to allow new development (Freya Lower South Hill highlighted).
- More mixed-uses everywhere; less areas with single uses.
- Locate employment and industrial uses on edges of the city.
- Provide/expect commercial uses to pop up around employment.
- Provide more attractions; things for groups/teens to do together.

Station 5: Map Your Future Spokane – Mixed-Uses

Through a mapping exercise where different color pins represented different types of mixed-use designations, community members were asked to identify where they thought different sizes and scales of mixed-use development should be located throughout the City. In general, participants had few locations they wanted mixed-uses to be located. However, MU-TOD was identified for Market Street, North Monroe, and portions of Ruby. MU-3 was identified on West Sunset Boulevard.

In addition to pin placement, addition comments included:

- MU-2 should be everywhere.
- No neighborhood businesses, there is no parking.

- No Latah-Cannon Corridor plan; all the traffic, no plan.
- No mixed use in neighborhoods, protect neighborhood from exploitive development.
- Want to see more intensity at arterials, then higher commercial, and finally residential.
- Want a transportation plan for Cliff-Cannon; there's no future plan considering 195 and I-90 ramp.

Station 6: Map Your Future Spokane - Transportation

Through a mapping exercise that included stickers that indicated preferred development types and street upgrades, community members were asked to identify what type of street improvements and destinations they want to see along major transit stops throughout Spokane. In general, community members indicated wanting street trees along Ruby and Division, as well as downtown; improved bike connections north of Francis Avenue in the northwest, in South Logan at Mission and Hamilton, near Spokane Community College, and near Ray Street, Regal, and other areas in South Spokane; separate bike lanes at Wellesley and Driscoll Boulevard, within Latah Valley, and in various locations near downtown and just south of I-90 in the southwest; bus route improvements near Vinegar Flats and within Latah Valley; bus shelters throughout Latah Valley and on Ray Street; speed management along Grand Boulevard; and new and improved crosswalks throughout the southwest. Additional improvements, largely in in the southwest, include emergency services, improving bridges, new sidewalks, fixing of roads, lighting, and new intersection.

Station 7: Planning for Climate

Community members were asked to identify what actions they want the City of Spokane to take to support local climate resiliency. Those comments included:

- Create trails that are more like dog parks
- Support engaged and active citizenry for resiliency
- Expand safe bike and walking to grocery stores
- Responsible and equitable development
- Increase density and make it easier for residents to do that themselves
- More trees and shade along trails
- Ban wood burning fireplaces
- Create urban public garden inside parks
- Encourage TOD
- Encourage safe streets for bikes and pedestrians; protected bike lanes, more crosswalks
- Expand bike in infrastructure
- More walkable neighborhoods (i.e. 29th and Grand area
- Canon area lost lots of trees, not replanted by new development
- People drink PFAS and then it moves through sewer pipes and treatment

- Sewer infrastructure in Canon is old and breaks often
- Lack of parking becomes a safety and resiliency issue
- Incentivize more tree canopy in lower areas but maintain aging tree canopy (especially in aging demographics)
- Water quality of PFAS in mystic falls/garden spring due to development
- More dense development so there is less cross through traffic to sprawling suburbs
- Enable neighborhoods to create more social capital and be able to take action and help issues
- Incentivize responsible development
- Solar on rooftops before green spaces
- Money, investment, and code is very car focuses and needs to be more holistic
- Toolkit for tactical urbanism (empower communities to improve areas themselves)
- Life flight should use major corridors to reduce residential and wildlife noise pollution
- Expand historic preservation, create culture like Canon
- Fix challenging areas for biking (hills make it impossible and dangerous to bike, even with e-bikes)
- NSC will bring more car infrastructure and needs to be more resilient and multimodal
- Development should not be in neighborhoods
- Maintain our strong tree canopies
- Need more protected bike lanes
- Extend existing bike lanes, don't just stop the bike lanes suddenly
- Development should not remove trees, plants, and Spokane's distinct environment
- Rain retention facilities requirements should be stronger
- Bike lanes with multiple lines helps enforce walking
- Ensure social capital is created during development
- Green roofs
- More walking paths
- Stronger codes to maintain tree canopy
- Need to have an acknowledgement of growth/our limits

Station 8: Developing Climate Policies

In order to help develop climate and resiliency policies, community members were presented with top themes heard throughout the earlier phase of climate planning engagement. With those in mind, participants were then asked to identify any other topics of importance:

- Recognize limits to growth.
- Prioritize protection of mature trees and iconic basalt rocks.
- The new infill law is destroying mature trees and neighborhoods.
- No mixed-use growth in the middle of neighborhoods.
- Bike infrastructure
- Walkable neighborhoods
- Public Transportation in Latah Valley
- Protect trees
- Require parking spaces for all units, change setbacks to 5-feet, change lots from 20 to 50 foot minimum.
- Sponsor new windows for historic homes.
- Convert unused city property to public pea patches.
- Growth numbers should consider possibility of climate refugees.

Station 9: Environmental Justice

Community members were presented with the definition and ways to assess environmental justice, in order to support state required policies within the Comprehensive Plan. Participants were then asked to provide ideas on how the City of Spokane can support environmental justice:

- Plant more trees
- More bike lanes in all communities
- Community infrastructure built now to we have it when growth occurs
- Sound walls along freeways to protect housing
- Reducing pollution in low-income areas
- Walkable neighborhoods for everyone

Station 10: Prioritizing Climate Policies

In addition to identifying potential climate and resiliency policies, the climate planning effort will include a prioritization process. Community members were asked to identify the top criteria they believed should be weighted more heavily than others. Resilience received 6 votes, Equity received 3 votes, Climate Pollution Reduction received 4 votes, Logistics received 1 vote, and Risk received 2 votes.

Community members there then asked to identify any other criteria that should be considered:

- Without resilience, we will have a hard time delivering on the other policies
- Clear out underbrush in fire risk areas.
- Inequitable impact e.g. when you add a historic district, you reduce the value of the homes surrounding the historic district.
- Ban wood burning fireplaces.
- Tighten controls on vehicle emissions.
- Stop consolidating poverty; spread out affordable housing outside of poverty-stricken neighborhoods.
- Balancing costs and benefits to ensure prospective business ventures aren't too impacts.
- Stop allowing shelters in areas with no services.

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Memo

Re: District 3 Future Growth and Guiding Policies Community Workshop

The District 3 Future Growth and Guiding Policies Community Workshop occurred on November 18, 2025 at Salk Middle School. **Approximately 20 community members attended.** Feedback received at each station activity is summarized below. A full engagement summary of the workshop series will be developed at a later date.

Station 1: Guiding Policies

Community members were asked to write down what topics they want to make sure are addressed in the Comprehensive Plan to help identify potential gaps in the proposed amendments:

- Accessibility (housing and public space)
- Mixed-use housing in neighborhoods to make more "hubs" instead of strip malls
- More greenways and trails like Centennial; need north/south connections
- Protected bike lanes, not just painted ones
- Allow for more mixed use in established neighborhoods
- Allow for more walkable neighborhoods
- Sidewalks in existing development, not just new development
- Programs for homeless residents like jobs, including helping clean up neighborhoods
- Third spaces
- For elderly and disabled residents, walkable also means sittable
- Context sensitive design standards, especially in historic centers
- Sidewalk safety (e.g. electric scoots and conflicts with pedestrians)
- Require more design variety within new developments
- Create quality and beautiful places to live
- Less dependence on vehicles
- Allow for or encourage local services, restaurants, or grocery stores in neighborhoods
- Organize road construction planning so that if a main north/south roadway is under construction, you wait on further north/south projects

- Increase pedestrian safety at uncontrolled intersections on large roads, especially one way roads

Station 2: Displacement

After being told about three different types of displacement (physical, economic, and cultural), community members were asked what causes to housing and small business displacement are they most concerned about. Additionally, how could the City address them?

The comments included:

- Lack of low friction transit
- Lack of public spaces free from oppression
- Please always consider small business impact when considering taxes
- Greater options in affordable housing (location, size, etc.)
- Density transition, no high-rise next to single unit homes
- Building getting torn down for parking lots or mall centers
- Mixed use housing can balance both
- Vacant lots/parking lots sitting unused

Station 3: Land Use Schema

Community members were asked to provide feedback on proposed land use designations to implement the future growth of the Spokane. Specifically, they were asked what uses should be allowed in the different land uses and were should the land use be located. Participants reflected on the following land uses:

- Residential Low:
    - Consider impacts of less on-site parking
    - Allow small mixed uses (cafes, etc.) and embrace being an urban area
    - Allow mixed-use spaces, community spaces, community gardens, parks, and walkable third spaces.
    - No gas stations
    - Allow for small scale medical uses (e.g. dentist) near hospital district
    - Need transition between low- and high-density areas
- Residential High:
    - Needs to be expanded into existing lower scale residential, such as near transit or in close proximity to amenities
- Commercial:
    - Mixed use needs to be expanded
    - Take advantage of vacant commercial areas to add businesses or apartments
- Centers and Corridors:

    - No hostile architecture
    - Locate throughout Division once NSC is complete and traffic reduces
- Downtown:
    - Allow taller buildings and bigger business spaces
- Industrial:
    - Encourage adaptive reuse of existing spaces
- Open Space:
    - Undeveloped parks with trails, not every park needs big grass fields
    - Accessible open space
    - Mountain biking
    - 100% of the river should be public park

Station 4: Growth Alternatives

Community members were presented with the three Growth Alternatives being evaluated as part of the PlanSpokane 2046 Periodic Update process. Alternative 1 (Stay the Course) represents the current growth strategy. To address recent state legislation, Alternative 2 (Distributed and Balanced) and Alternative 3 (Center City and Regional Hubs) were developed out of earlier visioning and scoping engagement. After reviewing the proposed maps and a snapshot of environmental impact evaluation comparisons between the three alternatives, community members were asked to vote on their preferred growth strategy. Alternative 1 received 0 votes, Alternative 2 received 5 votes, and Alternative 3 received 1 vote.

Participants who did not fully prefer one alternative over another, as well as those who did make a selected, were asked to identify their likes and dislikes of potential growth options, as well as other considerations for future growth. Those comments included:

- Development is currently happening below bluff, create transitional uses to reinvent the area.
- Alternative 2 plus downtown revitalization preferred.
- Allow Browne's Additional uses through the city/neighborhoods.
- Alternative 2 improves already existing sprawl in city limits, Alternative 3 avoids sprawl.
- Neighborhood hubs needed throughout, create economic areas in neighborhoods.
- Alternative 2 has housing more accessible to all parts of the city and spread impacts.
- Plan around future light rail.
- Balanced alternative allows for areas to grow and revitalize more.
- Do not focus on downtown, people do not visit as often as other parts of the city.
- To change behavior, give a better alternative; carrot needed first.
- Pedestrian only streets or golf cart/scooter only streets needed.
- Need easier access to bus routes like Division.

- Downtown focus creates opportunity for more housing and revitalization/reuse of existing buildings.
- Alternative 2 preferred, but with preservation of historic buildings, revitalize or reuse buildings.
- The investment downtown of Alternative 3 is a good priority to avoid businesses leaving.
- Like the mixed uses in north Spokane but want downtown focus as well.
- Housing does not fix homeless problems, need other solutions like centralized facilities.
- Take advantage of areas already changing – vacant areas, industries that moved.
- Downtown expansion plus the connectedness along the streets and transit lines.
- Reuse abandoned commercial buildings for housing.
- Increase middle housing everywhere.
- Job growth is important; make sure we are encouraging industries and not just mixed-uses.
- Like a multi-block approach to intensities (like Alt 3 downtown) over less depth along transit lines.
- Downtown as a primary working hub allows for investments to make it a safe and appealing destination.

Station 5: Map Your Future Spokane – Mixed-Uses

Through a mapping exercise where different color pins represented different types of mixed-use designations, community members were asked to identify where they thought different sizes and scales of mixed-use development should be located throughout the City. In general, respondents wanted respondents wanted MU-TOD along Hamilton, North Monroe, and along the northernmost portion of Nevada Street; MU-1 between Northwest and Balboa/South Indian Trail neighborhoods, on North Monroe, and near the Shadle Library on Wellesley; MU-2 along Indian Trail Road; and MU-3 in the southwest corner of Manito/Cannon Hill, within Audubon/Downriver, and in Northwest.

Station 6: Map Your Future Spokane - Transportation

Through a mapping exercise that included stickers that indicated preferred development types and street upgrades, community members were asked to identify what type of street improvements and destinations they want to see along major transit stops throughout Spokane. In general, community members indicated wanting more street trees along Ruby and Division, Browne's Addition, and near Illinois Avenue; wider sidewalks on Division in downtown; lighting on Grand and south of Wellesley; bus shelters along Division; increase bus times near Government Way; better connected areas in Northwest and Audubon/Downriver as well as just south of downtown; improved intersection at near Freya and 5th Avenue; wayfinding near Maple/Walnut; and reduced speeds new Wellesley and Driscoll Boulevard.

In addition to sticker placement, addition comments included:

- There is no access from housing to river between TJ Meenach and Seven Mile.
- Close some intersections along Driscoll at A and C streets, they are dangerous and confusing.
- Increased (bus?) access and frequency to airport.
- Better "barriers" needed for separated bike lanes.
- Browne's Addition/Downtown need pedestrian and bike connection improvements at Maple and 1st/Pacific/Riverside.

Station 7: Planning for Climate

Community members were asked to identify what actions they want the City of Spokane to take to support local climate resiliency. Those comments included:

- Provide good resilient tree typers that don't cause damage to pipes.
- Help connect homeowners with getting weatherization like insulation (both knowledge and resources).
- Discourage the purchasing of big gas guzzling trucks, SUVs, etc.
- Support the replacement of trees when they need replanted
- Make our neighborhoods more beautiful and bring community pride
- Tree maintenance subsidies
- Fire hazard mitigation for homeowners
- Ensure trees are watered, when people quit watering their yards in the summer, they also don't water the trees
- Developers need to plant higher age and mature trees
- Equal investment opportunities into neighborhoods
- Work with local areas, including Idaho, to maintain/preserve climate
- Use more fire safe housing material in new developments
- Targeted partnerships to get better air filters for the community
- More signage about issues like heat islands, where/when they are happening
- Take a position as a city to go solar, provide information to connect to contractors or best products
- More coverage of trees throughout Spokane
- Need formal river access for non-car residents between TJ Meenach and 7-Mile
- More trail and native preservation little parks
- Look at housing ages to determine places to target aging tree replacement
- Quit encourage people to remove yards, instead of drought tolerant, most people are landscaping with rock and amplifying the problem.
- Do more that just Avista providing energy efficiency

- Urban re-forestation tree planting subsidies
- Raise subsidy help by a sliding scale
- Window upgrade help to reduce energy cost

Station 8: Developing Climate Policies

In order to help develop climate and resiliency policies, community members were presented with top themes heard throughout the earlier phase of climate planning engagement. With those in mind, participants were then asked to identify any other topics of importance:

- No additional power to AI facilities, it will create more pollution
- More bus only lanes to make public transit faster, cheaper, and quicker
- SpokaneScape: incentive model is helpful, but businesses are exempt
- More improvements to bike infrastructure and consistent connectivity throughout neighborhoods
- Tree and native landscaping
- Better park and transit accessibility for walkable neighborhoods
- Tree canopy
- Promotion of local community solution for addressing climate
- Address financial barriers
- Low/zero friction public transit
- Shade
- Intersection of natural and built environment
- Mental and physical health
- Low-cost improvements to support biking
- Education around benefits of tree canopy
- Incentivize tree planting on the north side of the city
- Hold businesses more accountable
- Trees as physical barriers for bike lanes to improve safety
- Greenhouse gas emissions related to “dead internet”

Station 9: Environmental Justice

Community members were presented with the definition and ways to assess environmental justice, in order to support state required policies within the Comprehensive Plan. Participants were then asked to provide ideas on how the City of Spokane can support environmental justice:

- Support bicycle use and protected bike lanes
- Fruit and nut trees in public spaces, not ornamental fruit trees
- Protected bike lanes and bus only lanes
- Supporting walkable neighborhoods for community development
- Fund solar panel
- Heat mitigation in neighborhoods, especially East Central

- City should provide funding opportunities for climate change mitigation activities
- Supporting pedestrian transportation
- Leaf removal should happen in West Central, equal access to resource
- More advertising for Spokanopy and SpokaneScape
-
- Safer roads
- Support equity in neighborhoods impacted by freeways through noise barriers, reinvestment without gentrifying
- More bus rapid transit throughout the city
- Stop watering public spaces that aren't parks

Station 10: Prioritizing Climate Policies

In addition to identifying potential climate and resiliency policies, the climate planning effort will include a prioritization process. Community members were asked to identify the top criteria they believed should be weighted more heavily than others. Resilience received 8 votes, Equity received 5 votes, Climate Pollution Reduction received 7 votes, Logistics received 5 votes, and Risk received 1 vote.

Community members there then asked to identify any other criteria that should be considered:

- Legislative control to create solutions
- How to reduce homelessness/outdoor sleeping to make people less vulnerable
- Build equity into each criterion

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Memo

Re: Citywide Future Growth and Guiding Policies Community Workshop

The Citywide Future Growth and Guiding Policies Community Workshop occurred on November 19, 2025 at the Central Library. **Approximately 35 community members attended.** Feedback received at each station activity is summarized below. A full engagement summary of the workshop series will be developed at a later date.

Station 1: Guiding Policies

Community members were asked to write down what topics they want to make sure are addressed in the Comprehensive Plan to help identify potential gaps in the proposed amendments:

- Art districts
- Neighborhoods being distinct
- Overnight daycares
- Spark House
- Address land speculation
- Shopping District (Monroe, Garland)
- Indoor swimming pools for the winter
- Trails
- Action plan for incentivizing affordable, dense housing
- Daycare centers
- Conservation/migration corridors to connect to County corridors
- Promoting outdoor activities in the winter e.g. park use in the winter, SCC pool
- Addressing employment and job creation
- Ensuring adequate levels of transportation/transit opportunities to reduce single occupancy vehicles
- Aim to make all playgrounds and parks accessible
- Natural playgrounds
- Shoreline master planning

Station 2: Displacement

After being told about three different types of displacement (physical, economic, and cultural), community members were asked what causes to housing and small business

displacement are they most concerned about. Additionally, how could the City address them?

The comments included:

- Faster permit processing
- City should be involved in public housing development
- High housing costs are a concern
- Mobile home park developments being replaced by affordable multi-family housing
- Business displacement due to neighborhood perception of safety
- Lack of housing inventory to keep up with population increases

Station 3: Land Use Schema

Community members were asked to provide feedback on proposed land use designations to implement the future growth of the Spokane. Specifically, they were asked what uses should be allowed in the different land uses and were should the land use be located. Participants reflected on the following land uses:

- Urban Agriculture:
    - Allow flower growers, small vegetable and fruit farmers market-type food production
    - Locate to avoid impacts of potential pesticides
- Residential Low:
    - Human-scale and human serving design
    - Allow parking
    - Allow community gardens and indoor community pools
- Residential High:
    - Accessible housing (no stairs)
- Centers and Corridors:
    - Allow multi-family as well as trade/live work makerspaces
    - Do not allow drive throughs
- Institutional:
    - Incentives apartments
    - Community pools
- Open Space:
    - Allow indoor community pools
    - Provide enough parks/trails so those in dense areas/apartments have a place to go outside

Station 4: Growth Alternatives

Community members were presented with the three Growth Alternatives being evaluated as part of the PlanSpokane 2046 Periodic Update process. Alternative 1 (Stay the Course) represents the current growth strategy. To address recent state legislation, Alternative 2 (Distributed and Balanced) and Alternative 3 (Center City and Regional Hubs) were developed out of earlier visioning and scoping engagement. After reviewing the proposed maps and a snapshot of environmental impact evaluation comparisons between the three alternatives, community members were asked to vote on their preferred growth strategy. Alternative 1 received 0 votes, Alternative 2 received 9 votes, and Alternative 3 received 3 votes.

Participants who did not fully prefer one alternative over another, as well as those who did make a selected, were asked to identify their likes and dislikes of potential growth options, as well as other considerations for future growth. Those comments included:

- North/South and East/West connection in Alternative 2 is a positive
- Diversity of locations is positive for clients/investors; "diversity of options"
- Use land along Government Way/West Hills
- Alt 2 creates bridge between neighborhoods
- Protect agricultural lands; encourage regenerative agricultural practices
- Like NW mixed use proposal
- East/West supported in Alt 2 along Wellesley and Francis
- Alt 3 plus Wellesley, E/W connection
- Like mixed use along NW Boulevard in Alt 2
- Alter 2 favors more positive distribution but also add corner stores
- Neither alternative focus on connecting smaller areas
- Encourage arts through home occupation
- Alternative 2 needs the medical focus and should include better transit for shift work for medical staff
- Watch out for community displacement in West Center/Broadway
- Push heavy industrial outside of city limits
- Health impact to neighborhoods should be analyzed
- Add home occupation for mix of jobs/uses
- Need traffic calming at Broadway in West Central
- Ensure professional buildings are also part of mixed-use areas, not just retail/food
- For industrial areas where residential areas can be allowed, expand the tree canopy
- Need to address transportation
- More mixed-use and corner stores with pedestrian emphasis
- Need code enforcement for parking in Cannon
- Maintain Center and Corridors

Station 5: Map Your Future Spokane – Mixed-Uses

Through a mapping exercise where different color pins represented different types of mixed-use designations, community members were asked to identify where they thought different sizes and scales of mixed-use development should be located throughout the City. In general, respondents wanted respondents wanted MU-TOD near the Shadle Library on Wellesley, along Market Street in Hillyard, on North Monroe, along Mission, in parts of downtown and Cliff-Cannon, and in areas on 29th; MU-1in north Five Mile Prairie, in parts of Audubon/Downriver and West Central, and downtown; MU-2 in Shiloh Hills, Northwest, and North Hill and in areas along 29th; and MU-3 in multiple areas spread out through Comstock, Latah/Hangman, Lincoln Height, East Central, Cliff-Cannon, Manito/Cannon Hill, Chief Garry, Audubon/Downriver, Bemiss, and Whitman.

In addition to pin placement, addition comments included:

- No more drive throughs
- Need parks and trails in Hillyard
- Design for less disruption in displacement
- Cannon's Addition concern over privacy with height differences
- Cannon's Addition needs transportation management
- More health and transportation access in West Central
- Trades academy
- 24-hour day care
- Designated business district/center/corridor down east Broadway of West Central
- Trade and maker spaces in West Central
- "Sparkhouse" at McKinley School, various locations throughout City
- Create protections against displacement in Chief Garry around City Line stopes, including increasing resources for community
- Increase Pedestrian/Bike Infrastructure along Northwest Boulevard

Station 6: Map Your Future Spokane - Transportation

Through a mapping exercise that included stickers that indicated preferred development types and street upgrades, community members were asked to identify what type of street improvements and destinations they want to see along major transit stops throughout Spokane. In general, community members indicated wanting increase bus access in downtown, along Grand Boulevard, out towards the airport, and near Northwest Boulevard; bus shelters on Wellesley in West Central; downtown wayfinding, seating along Wellesley, Northwest Boulevard, Division, Market, Grand Boulevard, and Regal; improved or new crosswalks on Northwest Boulevard and near Monroe Street, as well as near Trent Avenue and on Francis; intersections throughout northwest Spokane; street trees in East Center and downtown; and greater and safer bike connectivity along Division, between Division and Monroe, and on Grand.

In addition to sticker placement, addition comments included:

- On Grand Boulevard from 9th to 29th, add center turn lane, remove parking, and add bike lanes.
- Increase separated protected bike connectivity north/south away from Centennial Trail
- Double decker bus cut frequency of the 6, not frequent enough
- Slow down one-way couplets or remove them
- No in-town highways
- Potential for strong transit connectivity with Valley-BRT or light rail on Sprague Avenue
- Add pedestrian mall/mid lane island to Main Street
- Create school streets and shared streets
- Finish the envisioned boulevard plan for Regal Steet through Southgate District Center
- On Washington, Howard, and Post flip bike lane and parking
- Push Monroe Road Diet down to Kendall Yards
- Recommended bus routes, including to natural areas like Mt. Spokane, Little Spokane River, and Bowl and Pitcher
- Slow default neighborhood speeds to 20 MPH
- Climate town videos like park(ing) day
- Grand should have a different type of arterial status
- Micromobility designated spaces/use for daylighting off sidewalk parking
- Blue Moon Nursery will sell and develop
- Develop planned pedestrian natural surface trail along Latah Creek
- Make a one hour bus loop down to Latah through Cliff-Cannon
- Pedestrian path buried in park development
- Trail easement at 11th Ave and bridge

Station 7: Planning for Climate

Community members were asked to identify what actions they want the City of Spokane to take to support local climate resiliency. Those comments included:

- Climate resilience education
- End wood burning fireplaces
- Real penalties for water use abuse
- Park and ride/multimodal transportation system
- Incentivize public transit use
- Encourage water conservation and restrict water use in dry months
- Extreme weather even shelters
- Adon't rely on air conditioners as they just displace heat, use good design

- Increase accessibility of recycling and composting
- Stop logging forests to make room for development, planting street trees does not replace natural forests
- Address growth at the edge of the UGA
- Stop over building lots and not leaving space for trees
- Park and ride as entry way into public transit use

Station 8: Developing Climate Policies

In order to help develop climate and resiliency policies, community members were presented with top themes heard throughout the earlier phase of climate planning engagement. With those in mind, participants were then asked to identify any other topics of importance:

- Indoor spaces to escape to during weather extremes
- Water conservation
- More resources directed to conservation programs
- Street trees, including maintenance
- Food security
- Allow fruit trees near street/sidewalks
- City should partner with property owners to maintain trees to offset costs
- Support creation of more efficient building construction
- Restrict wood burning fireplaces to improve air quality

Station 9: Environmental Justice

Community members were presented with the definition and ways to assess environmental justice, in order to support state required policies within the Comprehensive Plan. Participants were then asked to provide ideas on how the City of Spokane can support environmental justice:

- Low-income renters and homeowners can't easily afford maintenance of sidewalks/trees/bioswales, but these improve their environment; city needs to support neighborhoods by maintaining these elements
- Reduce light pollution
- Protecting elders from heat impacts through tree canopy and programs to reduce costs for AC units
- Land bridge for wildlife crossing (Thorpe and 195); don't just plan for humans
- Increase public indoor pools for year-round use for social and health benefits for kids and elderly
- Amenities like parks and other public places need to be designed to allow vulnerable populations to access during high temperatures

Station 10: Prioritizing Climate Policies

In addition to identifying potential climate and resiliency policies, the climate planning effort will include a prioritization process. Community members were asked to identify the top criteria they believed should be weighted more heavily than others. Resilience received 6 votes, Equity received 7 votes, Climate Pollution Reduction received 3 votes, Logistics received 1 vote, and Risk received 0 votes.

Community members there then asked to identify any other criteria that should be considered:

- Emphasize natural environment as a component of resilience criteria

Welcome!

The City of Spokane is working on a periodic update to the City's Comprehensive Plan as required by the State's Growth Management Act (GMA). This "periodic update" ensures the plan aligns with any changes to state law. The last periodic update was completed in 2017. Since then, the State has added new requirements, especially around climate and housing. Due in June 2026, the periodic update will identify policies and future regulations to guide the next 20 years of our city.

What We're Planning For

Population

Based on growth forecasts for Spokane County, the City of Spokane is expected to gain at least **23,357 new residents between 2023 and 2046,** bringing the City's total population to just over 256,000.

23,357
projected new residents by 2046

Housing Needs

As part of the periodic update, the City of Spokane is seeking to better understand how to support existing housing while addressing future housing needs.

Per state requirements and County allocations, the City of Spokane is expected to need **22,359 additional permanent housing units** between 2020 and 2046. 13,415 of those units are to accommodate new residents, while the remaining units are intended to meet past housing underproduction needs. In addition to a total number of housing units, the City of Spokane is also required to plan for housing by affordability bracket.

22,359
additional permanent housing units needed between 2020 and 2046

Learn more at PlanSpokane.org

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Environmental Impact Statement

Background

As part of the PlanSpokane 2046 process, the City of Spokane is developing an Environmental Impact Statement (EIS), an informational document that provides the City, public, Tribes, and agencies with environmental information to be considered in the decision-making process.

An EIS is required under the State Environmental Policy Act (SEPA) for larger projects, such as significant updates to Comprehensive Plans. An EIS describes potential environmental impacts, reasonable alternatives, and ways to avoid or minimize negative impacts that could result from implementation of policies, informing the Comprehensive Plan Periodic Update.

Draft EIS

The Draft EIS presents three alternatives to test different growth patterns and policies. The City of Spokane will then create a "preferred alternative" based on public input and the Draft EIS evaluation of the range of the alternatives.

The preferred alternative may include any features of the studied alternatives, including a combination of various elements from all of the alternatives. The preferred alternative will be evaluated in the Final EIS.

Final EIS

After public feedback and the selection of a preferred alternative, a Final Environmental Impact Statement will be written that analyzes the chosen path forward.

The Final EIS will also respond to comments received on the Draft EIS.

EIS Topics

- Earth, water quality, and water resources
- Air quality and greenhouse gas emissions
- Plants and animals, including critical areas and habitat
- Land use patterns and urban form, including historic and cultural resources
- Population, employment, and housing
- Relationship to plans, policies, and regulations
- Transportation, including multiple modes and city and state facilities
- Public services: police, fire and emergency medical services, parks, schools, libraries, solid waste
- Utilities: power, water, wastewater, and stormwater

Growth Alternatives

The City is studying three alternatives in the Draft EIS. Each alternative describes different growth strategies.

Legend

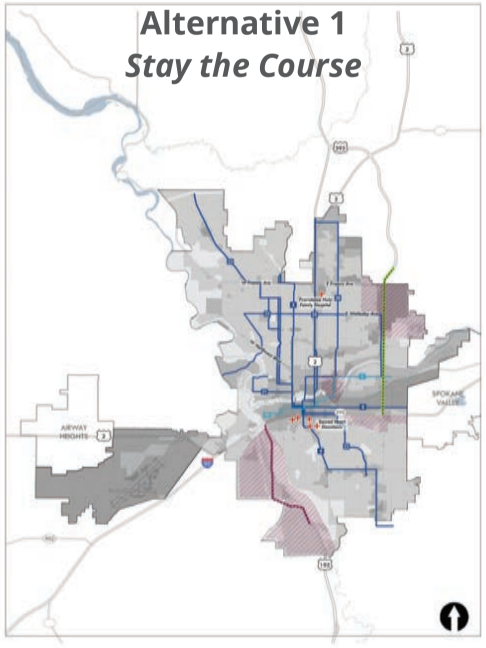
Growth Intensity (Alternative 1)

- Low
- Moderate
- Moderate-High
- High

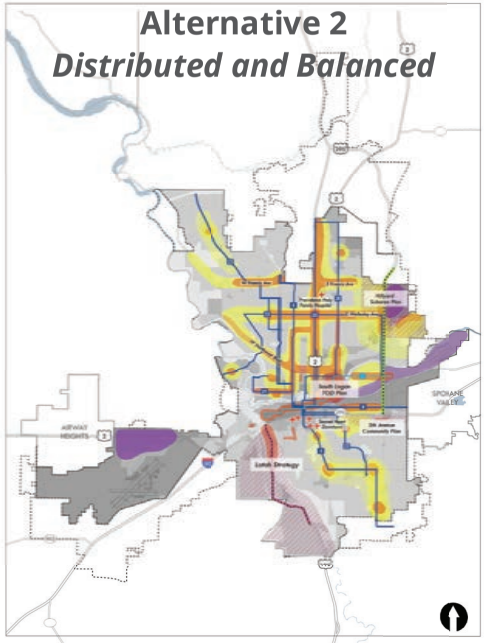
Growth Intensity (Alternatives 2 and 3)

- High Density Housing
- Moderate Density Housing
- Mixed Use / Commercial
- Employment/ Industrial Light
- Employment/ Industrial Heavy

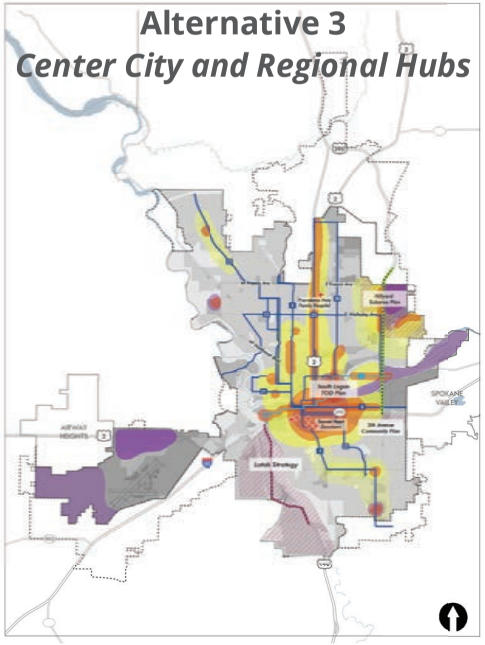
Alternative 1
Stay the Course



Alternative 2
Distributed and Balanced



Alternative 3
Center City and Regional Hubs



High Density Housing

Moderate Density Housing

Mixed Use / Commercial

Employment/ Industrial Light

Employment/ Industrial Heavy

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Alternatives Comparison *(Preliminary)*

This board shares preliminary environmental impact evaluation results on the natural and built environment. Each table has a table or "report card" with comparison symbols. Impacts may be greater or lesser, or there can be potential beneficial impacts/mitigation measures. The results may change with the completion of the Draft EIS.

There will be a public comment opportunity to weigh in on the alternatives and the Draft EIS evaluation. That will help the City of Spokane create a Preferred Alternative that mixes and matches alternative features and adds mitigation measures that can reduce impacts on the natural and built environment.

Objectives

OBJECTIVES	ALT. 1	ALT. 2	ALT. 3
Meet Periodic Update Requirements	x	✓+	✓+
Accommodate Growth: Housing at All Affordability Levels	✓	✓+	✓+
Accommodate Growth: Jobs	✓	✓	✓+
Clarify the Plan	x	✓+	✓+
Simplify the Plan and Codes	x	✓+	✓+
Protect Critical Areas	✓	✓+	✓+
Fast-Track Desired Growth	x	✓+	✓+
Alignment with Vision Statement	x	✓+	✓+

Ability to Meet Objectives
x Less ✓ More ✓+ Most

Report Card - Natural Environment

NATURAL ENVIRONMENT	ALT. 1	ALT. 2	ALT. 3
Earth, water quality, and water resources: Potential for increased pollution and potential for increased rainfall runoff flows based on housing density distribution.	▼▼	▼	▽
Plants and animals: Potential for habitat conversion, or loss of habitat connectivity			
Center City	△	△	▲
Northwest	▼▼	▼	▼
Northeast	▼	▽	▽
South	▼▼	▼▼	▼▼
West Plains	▼	▼	▼
Strength of Mitigation – Plan and Code Updates.	-	▲	▲

Adverse Impacts
▽ Less Impacts ▼ More Impacts ▼▼ Most Impacts

Potential Beneficial Impacts/Mitigation
- Neutral Impacts △ Moderately Positive ▲ Positive

Report Card - Built Environment

BUILT ENVIRONMENT	ALT. 1	ALT. 2	ALT. 3
Land Use Patterns and Urban Form			
Land use and Urban Form compatibility: Changes in use type between adjacent areas and potential incompatibility.	▽	▼	▼
Environmental Justice: Increased exposure of overburdened populations to light or noise pollution, environmental hazards, or urban heat island effects	▼	▽	▽
Population, Employment, and Housing			
Capacity for Housing and Population Targets	▲	▲	▲
Housing Variety and Affordability	▼	▲	▲
Implementation of Housing Action Plan	△	▲	▲
Growth in Housing Displacement Risk Areas / Increased Housing Supply that Reduces Economic Displacement Pressure	▽/▼	▼/△	▼/△
Job types and quantity and ability to advance City and regional economic development strategies	▲	△	▲
Commercial business economic displacement	▼	▽	▼
Relationship to Plans, Policies, and Regulations	▼	△	△
Public Services			
Citywide demand for police, fire/emergency medical services, schools, parks, libraries, and solid waste	▼	▼	▼
Schools – Spokane School District	▽	▼	▼
Schools – Mead School District	▼	▽	▽
Environmental Justice – Growth in Areas with Health and Social Disparities and Greater Service Demand	▽	▼	▼▼
Utilities			
Power, Water, Wastewater Demand	▼	▽	▽
Power, Water, Wastewater Infrastructure Upgrades	▽	▼	▼
Stormwater Generation	▼	▽	▽
Strength of Mitigation Potential – Plan and Code Updates	-	▲	▲

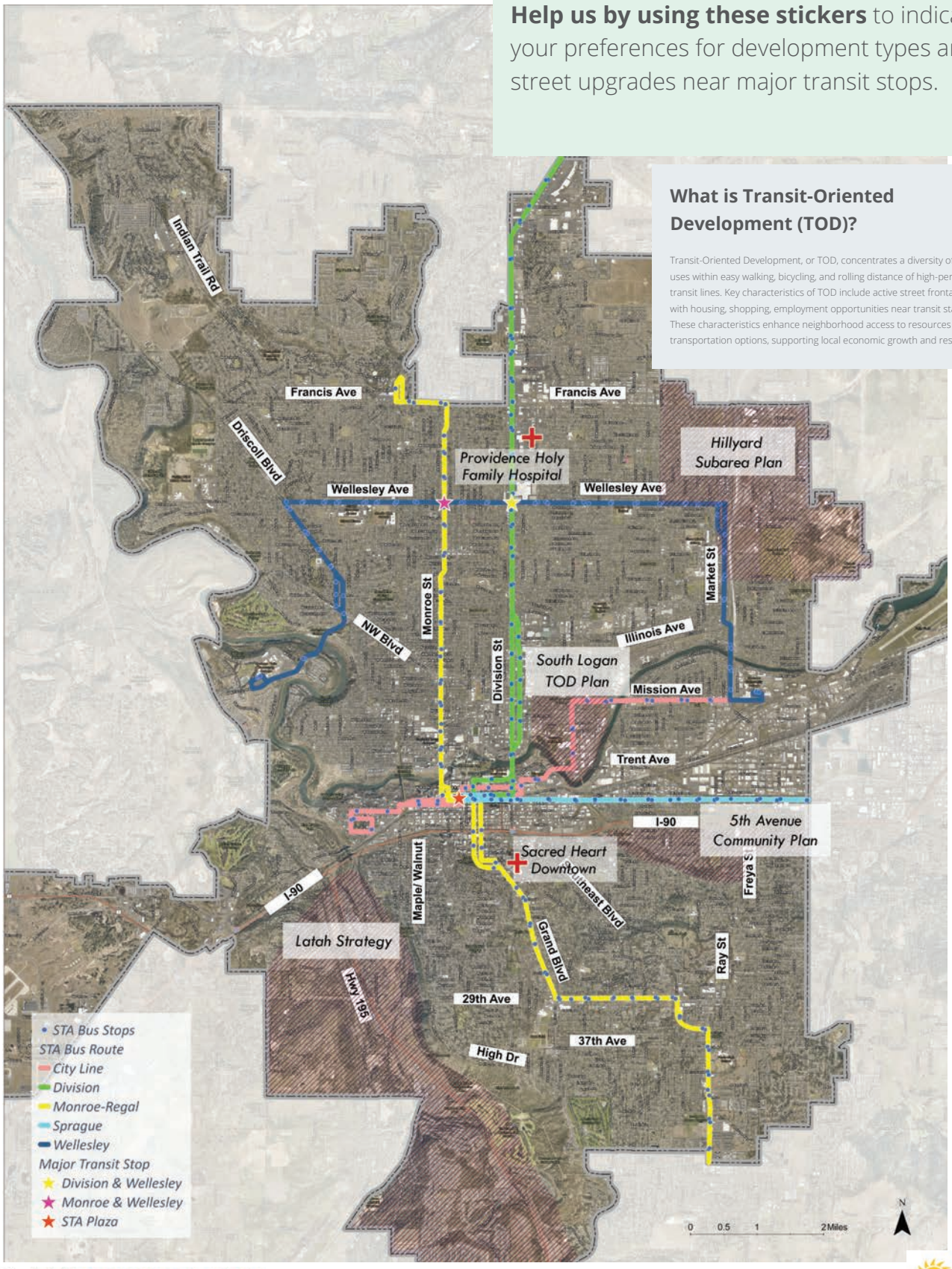
Your Ideas

What features of the different growth options do you like best? What could be improved?

Map Your Future Spokane - Transportation!

What type of street improvements and destinations do you want to see near transit throughout Spokane?

Help us by using these stickers to indicate your preferences for development types and street upgrades near major transit stops.



What is Transit-Oriented Development (TOD)?

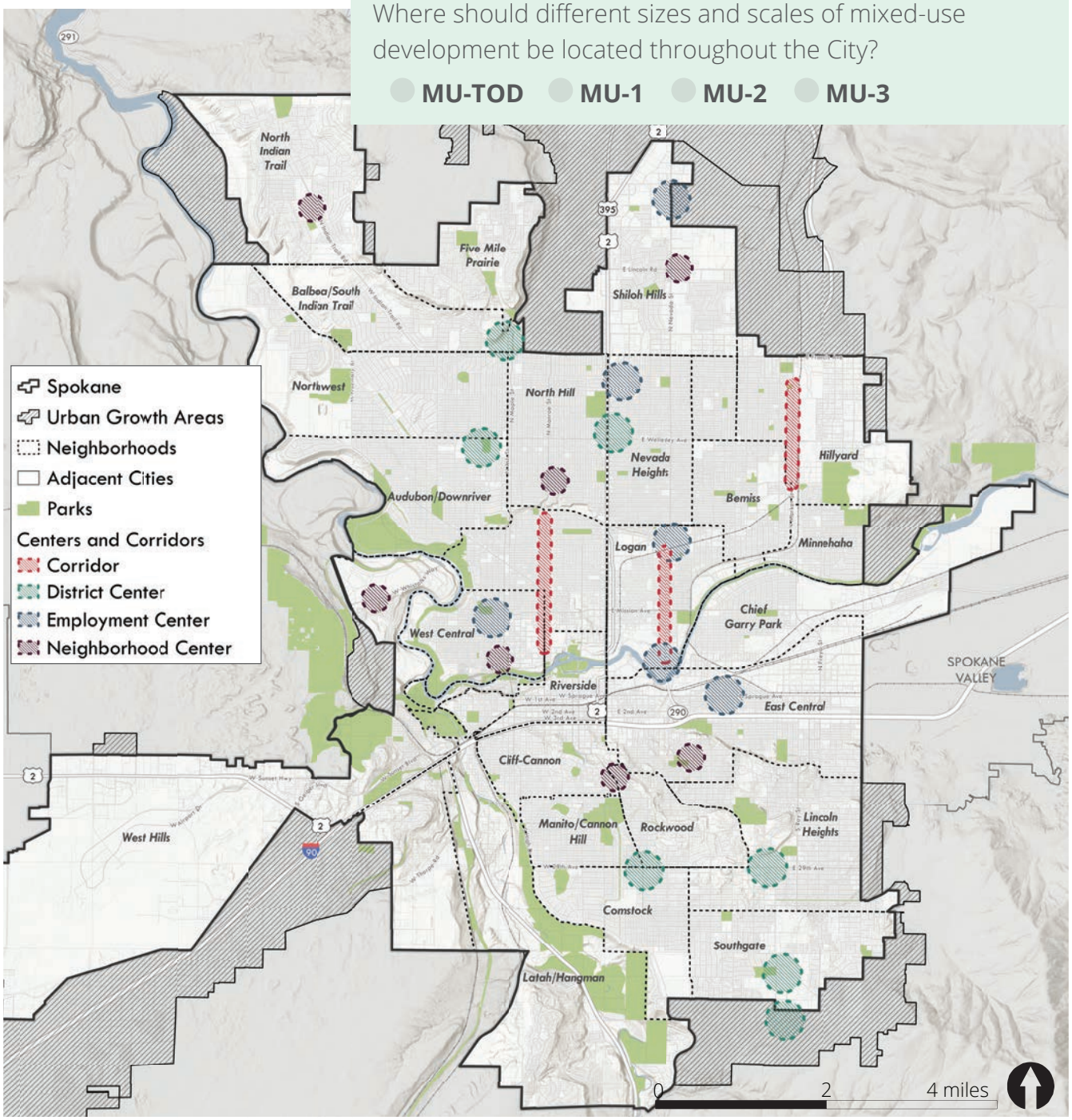
Transit-Oriented Development, or TOD, concentrates a diversity of land uses within easy walking, bicycling, and rolling distance of high-performance transit lines. Key characteristics of TOD include active street frontages with housing, shopping, employment opportunities near transit stations. These characteristics enhance neighborhood access to resources and transportation options, supporting local economic growth and resiliency.

Map *Your* Future Spokane!

Earlier community feedback indicated a desire for more mixed-uses throughout Spokane.

Where should different sizes and scales of mixed-use development be located throughout the City?

MU-TOD **MU-1** **MU-2** **MU-3**



MU-TOD

Transit-Oriented

- Targeted towards vicinity of major transit stops (within 1/4 mile).
- Tallest heights (150').
- Avoids vehicle-serving uses (no drive-thrus, commercial parking lots, etc.).
- No mini-storage
- Greatest provisions for people walking, bicycling, or rolling with assistive devices to access transit.

MU-1

Maximum Flexibility

- "Base" type for Centers and Corridors.
- Maximum amount of land use flexibility.
- Taller heights (90').
- Allow industrial zones where uses are currently industrial.
- Greatest amount of accommodation for people driving (drive-thrus permitted).
- Entirely residential buildings allowed.

MU-2

Small Neighborhood Scale

- Smaller scale and lower intensity than MU-1 zone.
- High amount of land use flexibility, but no self storage
- Moderate heights (75').
- Moderate support for people driving, but no drive-thrus on storefront streets
- Replaces some areas currently zoned Neighborhood Retail.

MU-3

Residential Mixed-Use

- Smallest scale and intensity, targeted towards neighborhood serving uses.
- Can be placed both inside Centers and in residential neighborhoods (limits on driveway spacing, street access)
- Heights similar to neighborhoods (40').
- Large-scale retail/services allowed but only in structures that also provide residential units.
- Focused on accommodating people walking, bicycling, rolling with assistive devices, and accessing transit.

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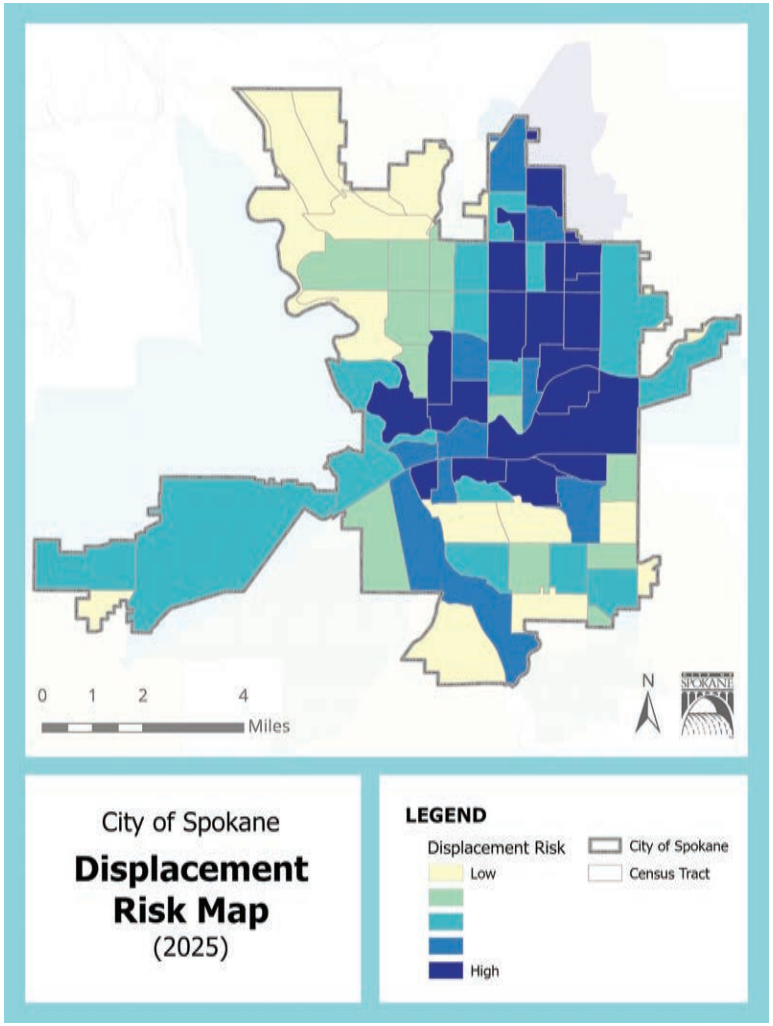
Displacement



As part of the PlanSpokane 2046 Periodic Update, the City of Spokane has completed analysis to understand displacement risk as we grow. As directed by recent state legislation (HB 1220), the City is working to establish anti-displacement policies.

Common anti-displacement policies include inclusionary zoning, tenant protections, public/private partnerships, tax incentives, community land banks, and development agreements.

There are **three primary types of displacement**:

- **Physical displacement**, which occurs when a project — such as building demolition, renovation, or infrastructure — creates such adverse conditions that a resident can no longer physically stay in their unit.
- **Economic displacement,** which occurs when increasing housing costs create pressure, forcing a household or business to move to a less expensive location.
- **Cultural displacement**, which occurs when changes render a neighborhood quite different, as many cultural institutions leave, creating a sense of isolation for long-term residents.

(Source: MRSC)

Your Ideas

What causes to housing and small business displacement are you most concerned about? How could the City address them?

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Scan here

More information about the displacement analysis, as well as racially disparate impacts, can be found at the Housing Needs webpage

What Can Be Built Where?

Provide feedback on proposed land use designations that will implement the future growth of our city.

What uses should be allowed and where?

What is Land Use?

Land use is essentially **what kinds of uses can be built where.** It guides which uses are compatible in different parts of the City while ensuring the whole City has the right mix of residential, commercial, and industrial uses needed to support a thriving city and economy. For example, an area designated for "mixed use" can have an office, a restaurant, or living units on the same street, while an industrial land use will allow mostly manufacturing or warehouses. Each land use allows different zoning categories within it. Zoning determines the rules and regulations that apply for uses and development for each property.

Land use type	What uses should or should not be allowed?	Where should the land use be or not be located?
Urban Agriculture · Low intensity residential with agricultural uses · Intended for small portions of the City already with agricultural operations		
Residential Low · Single-unit homes and middle housing · Small scale businesses and other public-serving uses allowed		
Residential High · Middle housing and taller/wider buildings with more units · Larger commercial uses than Residential Low		
Commercial · Non-residential uses for living, working, and shopping · Mixed-uses and multi-unit residential in some areas		
Centers & Corridors · Core or "heart" of each Center or Corridor · Other designations will likely be mixed in and around the core area		
Institutional · More intense residential and commercial uses to support colleges, medical centers, and other institutions		
Downtown · Taller buildings and higher density · Range of uses		
Industrial · Range of industrial uses including light industrial like maker spaces and rapid prototyping		
Open Space · Active parks and open space protection in some areas		

Chapter Review

Non-Technical Chapters Available for Public Comment

While there are many studies and projects in progress that will inform Comprehensive Plan updates through PlanSpokane 2046, a big part of any periodic update is a review and assessment of the many existing goals and policies. To this end, the City is undertaking a review of the current Comprehensive Plan, known as the Chapter Review process. Edits to the Community, Environment, and How We Grow Chapters have been made based on legislative requirements, direction from the Spokane Plan Commission, and community engagement.

All comments and recommendations on the non-technical chapters can be sent to PlanSpokane@spokanecity.org.

We encourage the public to include the Chapter name and Goal/Policy number(s) as applicable.

NON-TECHNICAL CHAPTERS

Community Chapters *+ Climate*

- Neighborhoods
- Governance & Participation
- Community Health

Environment Chapters *+ Climate*

- Natural Environment
- Parks and Recreation
- Shorelines *

"How We Grow" Chapters *+ Climate*

- Urban Design
- Historic Preservation
- Economic Prosperity

Technical Chapters *+ Climate*

- Land Use
- Transportation
- Housing
- Capital Facilities & Utilities

Climate will be addressed throughout the update.

**Per state regulations, Shorelines is not due to be updated until 2031.*

Learn more at the Chapter Review webpage

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Guiding Policies

As part of the Chapter Review process, seven non-technical chapters have been reviewed and updated to meet state legislative requirements, recent plans and studies, direction from the Spokane Plan Commission, and ongoing community engagement. These chapters are now out for public comment, with additional changes to each chapter are likely to occur as public feedback is collected, additional analysis is conducted, and a preferred alternative is selected for the final Plan and Environmental Impact Statement (EIS).

Your Ideas

As the chapters of the draft Comprehensive Plan continue to evolve based on community feedback, what topics do you want to make sure are addressed?

Report cards summarizing the current edits to the non-technical chapters indicate how many new, removed, or changed policies are in each chapter. **Learn more at PlanSpokane.org.**

Urban Design and Historic Preservation REPORT CARD

Action	Number of Policies
New Goals & Policies	8
Removed Goals & Policies	3
Changed Goals & Policies (Moved, Change in Direction)	8

Community Health REPORT CARD

Action	Number of Policies
New Goals & Policies	7
Removed Goals & Policies	2
Changed Goals & Policies (Moved, Change in Direction)	5

Economic Prosperity REPORT CARD

Action	Number of Policies
New Goals & Policies	9
Removed Goals & Policies	8
Changed Goals & Policies (Moved, Change in Direction)	5

Local Governance REPORT CARD

Action	Number of Policies
New Goals & Policies	4
Removed Goals & Policies	0
Changed Goals & Policies (Moved, Change in Direction)	2

Natural Environment REPORT CARD

Action	Number of Policies
New Goals & Policies	5
Removed Goals & Policies	3
Changed Goals & Policies (Moved, Change in Direction)	6

Neighborhoods REPORT CARD

Action	Number of Policies
New Goals & Policies	1
Removed Goals & Policies	4
Changed Goals & Policies (Moved, Change in Direction)	5

Parks REPORT CARD

Action	Number of Policies
New Goals & Policies	4
Removed Goals & Policies	2
Changed Goals & Policies (Moved, Change in Direction)	5

Planning for Climate Change in the City of Spokane

The City of Spokane is embarking on a transformative journey to support community resiliency to growing climate hazards. As part of this effort, we're undertaking a major update to our Comprehensive Plan, a foundational document guiding the city's growth. This update, mandated by law and due in 2026, presents a unique opportunity to integrate climate considerations into every aspect of our city's future.

What will the City of Spokane's climate planning do?

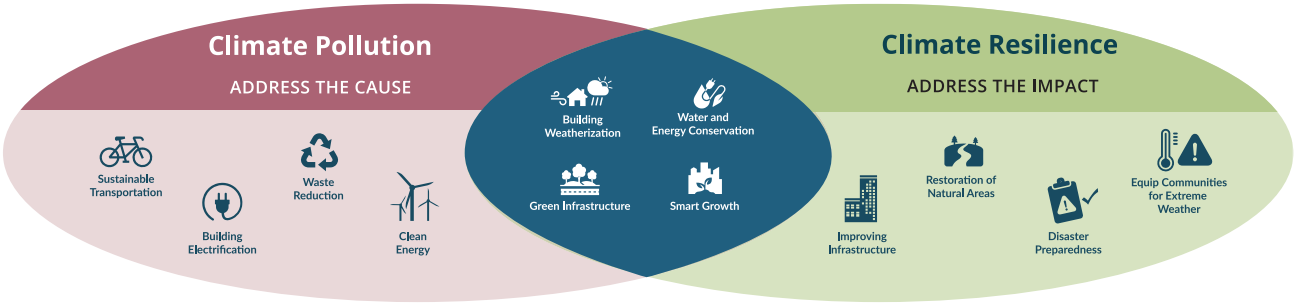
The City of Spokane's climate planning effort focuses on two main areas: reducing climate pollution and building local resilience to climate impacts.

Reduce Climate Pollution

1. Cut pollution from transportation, buildings, and other sources without shifting pollution elsewhere.
2. Expand walkable neighborhoods, bike infrastructure, and reliable public transit to reduce the need for driving.
3. Focus on pollution reductions that prioritize and benefit overburdened communities most impacted.

Build Climate Resilience

1. Prepare for climate hazards like flooding, extreme heat, drought, and wildfire smoke.
2. Protect and enhance green spaces and natural areas.
3. Help everyone prepare and stay safe from the impacts of climate hazards, especially those who are most vulnerable and will feel the effects first and worst.



What actions do you want the City to take to support local climate resiliency?

Write your ideas on a sticky note and place it below.

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FUNDED BY WASHINGTON'S CLIMATE COMMITMENT ACT

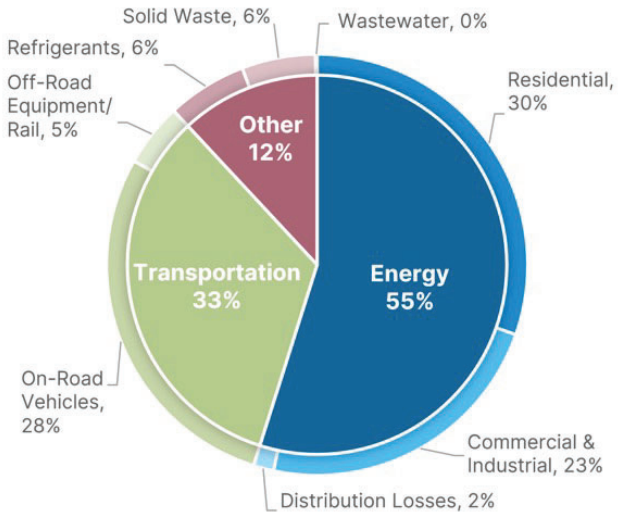
City of Spokane climate planning is supported with funding from Washington's Climate Commitment Act. The CCA supports Washington's climate action efforts by putting cap-and-invest dollars to work reducing climate pollution, creating jobs, and improving public health. Information about the CCA is available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

Climate Pollution in Spokane

What is Climate Pollution?

Climate pollution refers to the release of greenhouse gases and other pollutants that can affect the climate. It can cause serious effects on the environment, human health, farming, water supplies, and economies.

Climate Pollution Here in Spokane



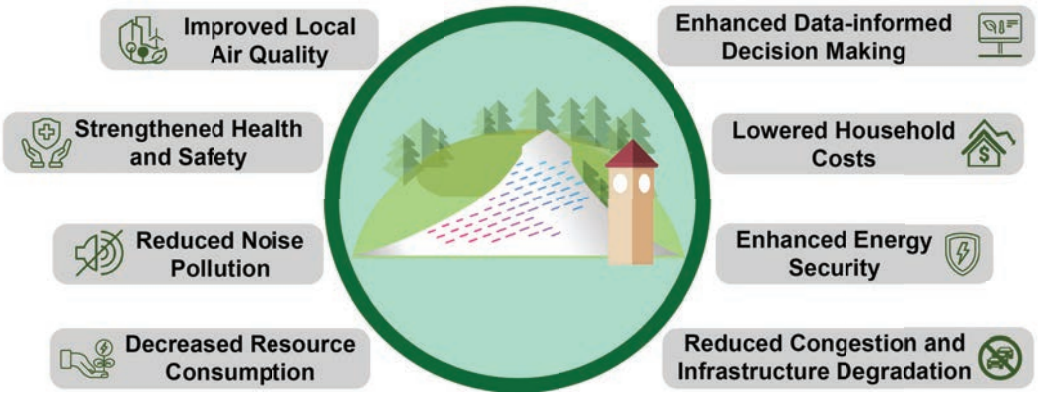
In 2022, the City of Spokane community emitted about 2.28 million metric tons of carbon dioxide (CO_2e), a measure of climate pollution. This is equivalent to the smoke emissions released from 240 square miles of Washington forest burned! The pie chart below shows where this pollution comes from.

This information and your feedback will help Spokane set goals and create plans to reduce pollution from the biggest sources.

Scan the QR Code for more information about the City of Spokane's greenhouse gas emissions.

https://my.spokanecity.org/publicworks/environmental/

Benefits of Reducing Climate Pollution



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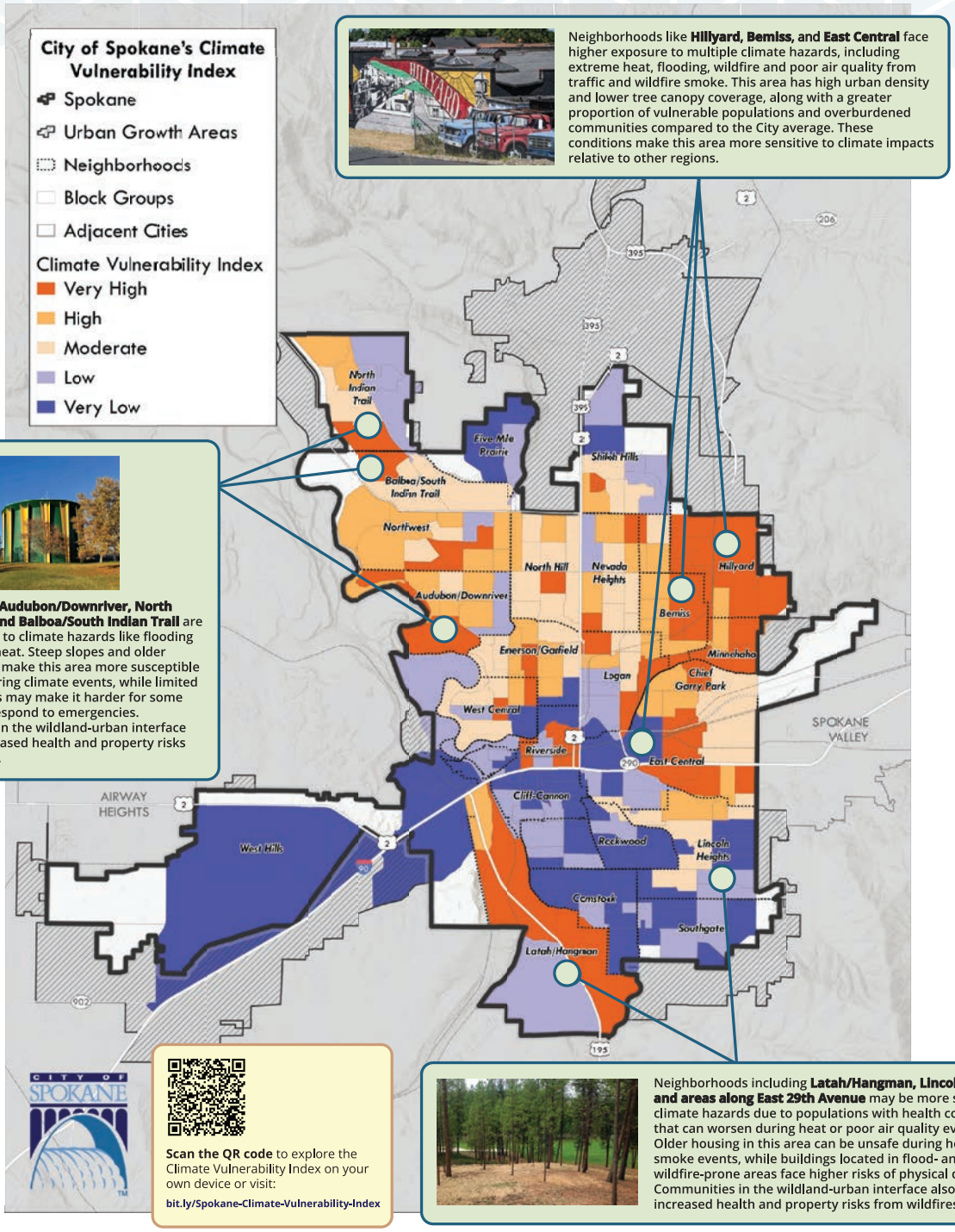
Spokane's Climate Vulnerability

The City of Spokane created a Climate Vulnerability Index mapping tool to better understand which areas, people, and resources are most at risk from climate impacts like extreme heat and wildfire smoke. The tool looked at over 30 factors, such as exposure to climate hazards and the ability to adapt.

The map shows that some parts of Spokane, like in Northeast Spokane and along the I-90 corridor, have higher overall climate vulnerability relative to other parts of the City. Meanwhile, some areas south of I-90 and on the north end of Spokane have lower vulnerability compared to other parts of the city. This can help inform the City about how to prioritize its resilience actions.



Neighborhoods like **Hillyard, Bemiss,** and **East Central** face higher exposure to multiple climate hazards, including extreme heat, flooding, wildfire and poor air quality from traffic and wildfire smoke. This area has high urban density and lower tree canopy coverage, along with a greater proportion of vulnerable populations and overburdened communities compared to the City average. These conditions make this area more sensitive to climate impacts relative to other regions.

Areas such as **Audubon/Downriver, North Indian Trail, and Balboa/South Indian Trail** are more exposed to climate hazards like flooding and extreme heat. Steep slopes and older infrastructure make this area more susceptible to damage during climate events, while limited transit options may make it harder for some residents to respond to emergencies. Communities in the wildland-urban interface also face increased health and property risks from wildfires.

Scan the QR code to explore the Climate Vulnerability Index on your own device or visit:
bit.ly/Spokane-Climate-Vulnerability-Index

Neighborhoods including **Latah/Hangman, Lincoln Heights, and areas along East 29th Avenue** may be more sensitive to climate hazards due to populations with health conditions that can worsen during heat or poor air quality events. Older housing in this area can be unsafe during heat and smoke events, while buildings located in flood- and wildfire-prone areas face higher risks of physical damage. Communities in the wildland-urban interface also face increased health and property risks from wildfires.

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Developing Climate Policies with Community Input

The City of Spokane is integrating climate considerations into its Comprehensive Plan—the guiding document for how the city grows and develops. The first phase of this work focused on listening to community experiences, assessing how climate change may affect Spokane, reviewing existing plans and policies, and evaluating the city's climate risks and vulnerabilities. The current phase builds on that foundation by revising, adapting, and developing new climate policies to include in the Comprehensive Plan. Your input today will help shape these policies!

Steps to Integrate Climate into the Comprehensive Plan

Phase 1: June 2024–June 2025

Step 1
Cut pollution from transportation, buildings, and other sources without shifting pollution elsewhere.

Step 2
Audit Plan and Policies.

Step 3
Assess Risk and Vulnerability.

Public Engagement: Survey, focus groups, public workshop, tabling at events, meetings with community-based organizations, online Climate Vulnerability Index tool.

Phase 2: June 2025–June 2026

Step 4
Revise, adapt, and develop new Climate Policy.

We Are Here!

Step 5
Integrate goals and policies.

Public Engagement: Survey, focus groups, public workshops, tabling at events, meetings with community-based organizations.

What We've Heard from the Spokane Community So Far

To date the City has heard from community members about how climate change is affecting Spokane and what actions they want the City to take in response. Here's a summary of what we've heard so far:

- **Wildfire smoke and extreme heat** are the most immediate and concerning climate impacts for the Spokane community.
- **Some community members are especially vulnerable** to climate hazards, including low-income residents, unhoused individuals, elders, youth, people with disabilities and chronic health conditions, renters, outdoor workers, Urban Native American and Tribal communities, communities of color, and those with language barriers.
- **Financial barriers** limit residents' ability to prepare for and respond to climate impacts. Community members strongly support incentives, assistance, and equitable access to resilience programs.
- **Water conservation**, **human health**, and **food systems** are top community priorities.
- **Green spaces**, **urban tree canopy**, and **City-led pilot programs** are valued by community members as important public investments that model climate resilience.
- **Public transit**, **bike infrastructure**, and **active transportation options** are supported by community members as ways to reduce emissions and improve access.
- **Community collaboration**, **education**, **engagement**, and **disaster preparedness** are emphasized by community members as key to building local resilience.

What other topics are important to you?
Tell us on a sticky note and leave it below.

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Environmental Justice

The City of Spokane will conduct an environmental justice assessment of draft land use and transportation policies being considered for the Comprehensive Plan update. This assessment will focus on avoiding the creation or worsening of environmental health disparities.

What is Environmental Justice?

As defined by state law, environmental justice means the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to development, implementation, and enforcement of environmental laws, regulations, and policies. Environmental justice includes addressing disproportionate environmental and health impacts in all laws, rules, and policies with environmental impacts by prioritizing vulnerable populations and overburdened communities and the equitable distribution of resources and benefits. (RCW 36.70A.030)

Why Assess Environmental Justice?

A changing climate impacts everyone, but some people face greater risks. These risks are influenced by where they live, their health, income, language barriers, and limited access to resources—factors often shaped by inequality. Environmental justice is a key part of efforts to ensure a clean and healthy environment for all, especially for communities of color and low-income households who are more likely to live near sources of pollution and other environmental burdens.

The City is required by law to address environmental justice in the Comprehensive Plan by:

- Identifying, protecting, and enhancing community resiliency to climate impacts, including social, economic, and built environment factors, in ways consistent with **environmental justice**.
- Prioritizing reductions that benefit overburdened communities, maximizing co-benefits such as reduced air pollution and **environmental justice**.
- Giving special consideration to achieving **environmental justice** in Land Use goals and policies, including efforts to prevent creating or worsening environmental health disparities.
- Using transportation and active transportation system standards as a gauge to measure system performance and success in supporting **environmental justice** goals.

What can the City do to support environmental justice? ?
Write your thoughts on a sticky note and place it below.

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Prioritizing Climate Policies

The City is using a prioritization process to select key climate policies. This will help ensure that policies can be implemented and align with state requirements.

Prioritizing Climate Policies

1 Pre-screening

Does the City have a **clear role?** *(lead, partner, communicator, or regulator)*

2 Scoring

- **Resilience**
- **GHG Reduction**
- **Equity**
- **Logistics** *(including cost, co-benifits, and feasibility)*
- **Degree of Certainty** *(including unintended impacts, public support, and momentum)*

3 Review

- Remove **redundancies**
- Ensure the list meets **State requirements, addresses key hazards,** and includes a **variety of topics, time frames, and responsible groups.**

After policies are prescreened, the City will score and rank policies using a set of evaluation criteria.
The criteria may include:

Resilience

- Reduces risks from climate hazards
- Prepares communities and infrastructure to withstand and adapt to climate hazards
- Enhances natural environments

Place stickers here.

Equity

- Builds community power
- Improves community health and well-being
- Holds institutions accountable for inequitable impacts
- Prioritize benefits for overburdened populations

Place stickers here.

Climate Pollution Reduction

- Reduces climate pollution (greenhouse gas emissions)
- Conserves resources
- Improves air quality

Place stickers here.

Logistics

- Considers cost and cost-savings
- Provides additional social, economic, or environmental benefits
- Level of administrative and staff capacity

Place stickers here.

Risk

- Avoids unintended impacts
- Addresses level of community support

Place stickers here.

Which criteria are most important to you?

Place a sticker next to the **top 3** criteria you think should be weighted more heavily.

Are there other criteria we should consider? Write your ideas on a sticky note and place it below.

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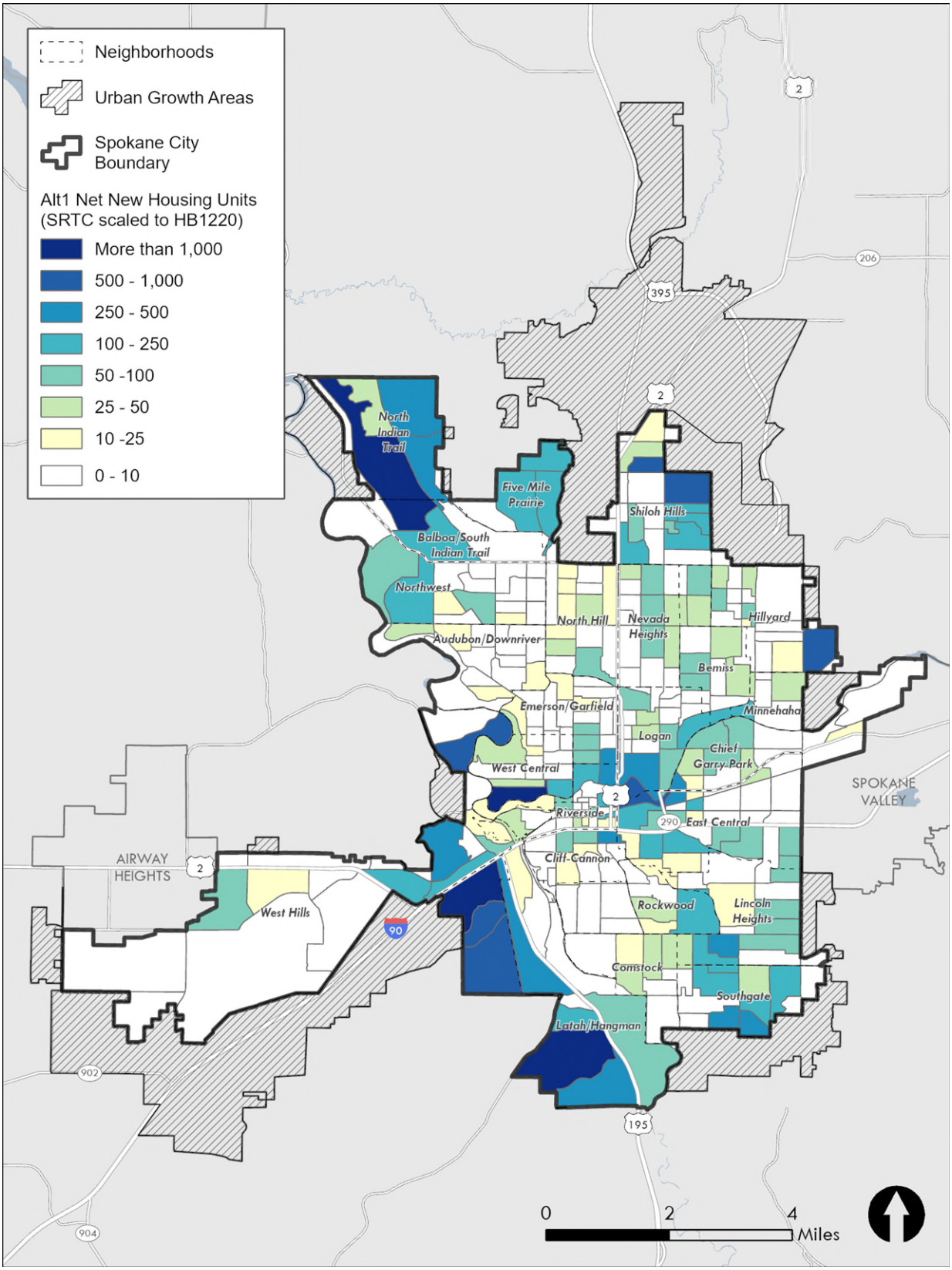
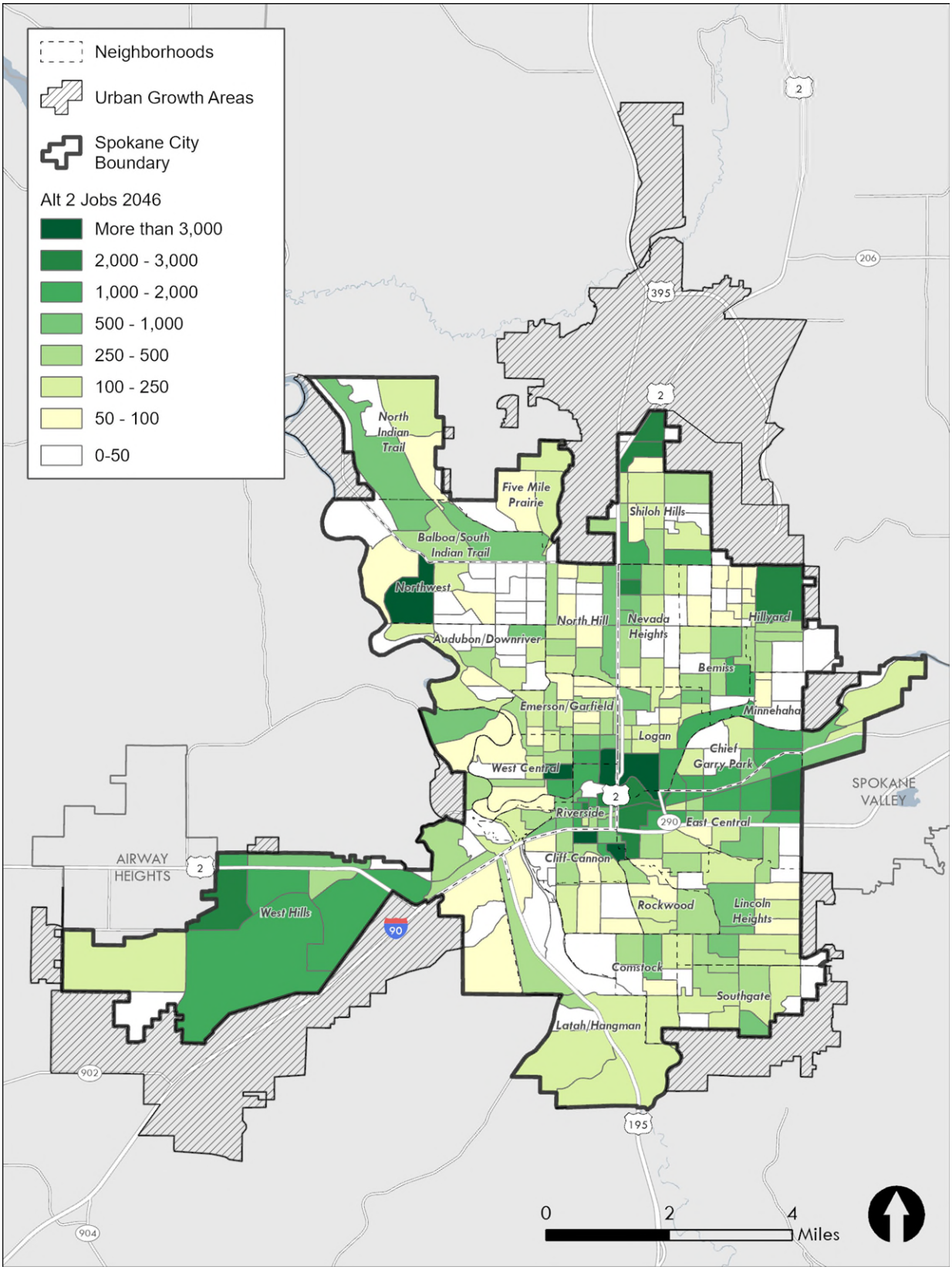
B Transportation Analysis Zones Maps

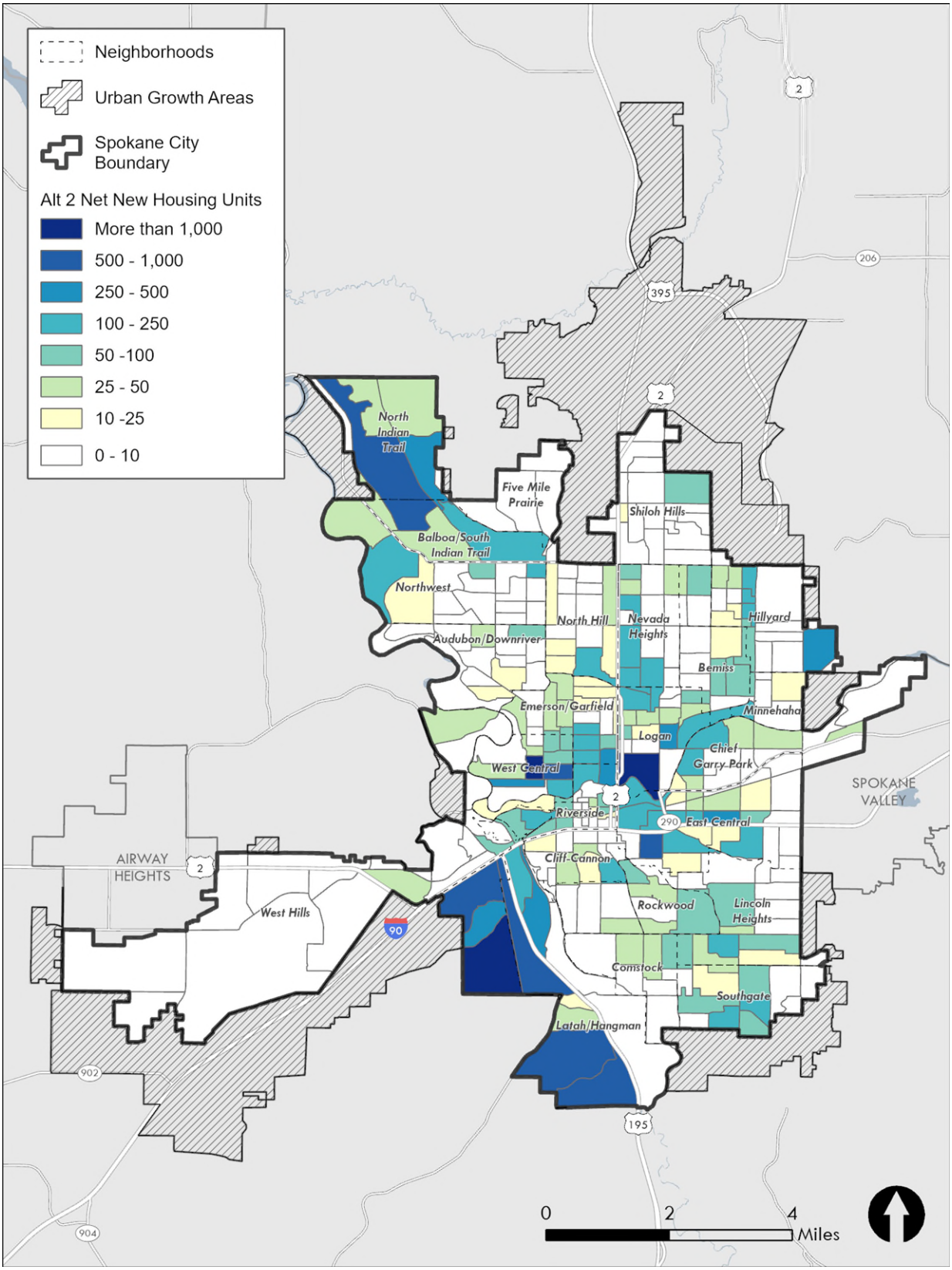
Alternative 1 – No Action Stay the Course: Housing



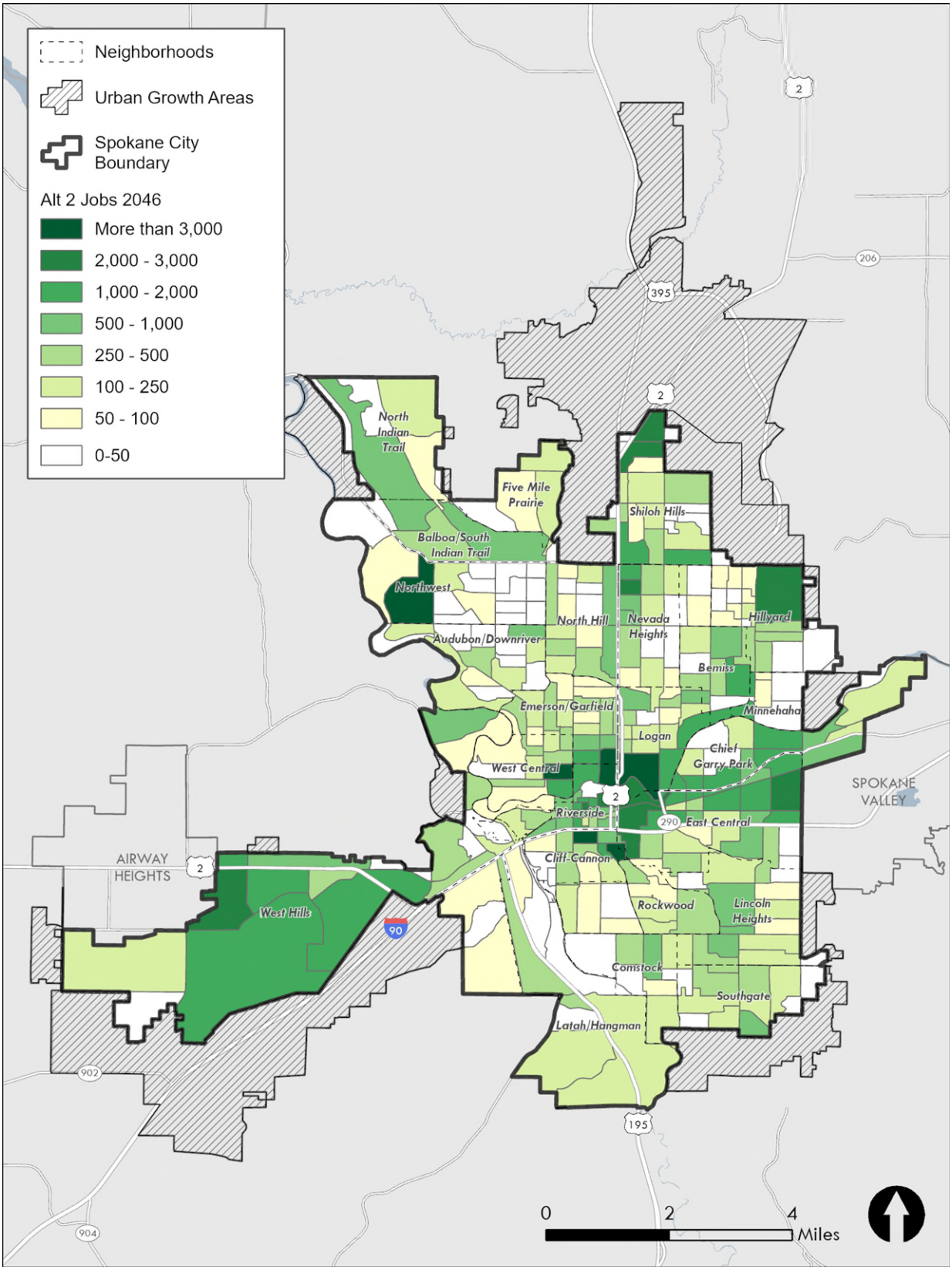
Alternative 1 – No Action Stay the Course: Jobs



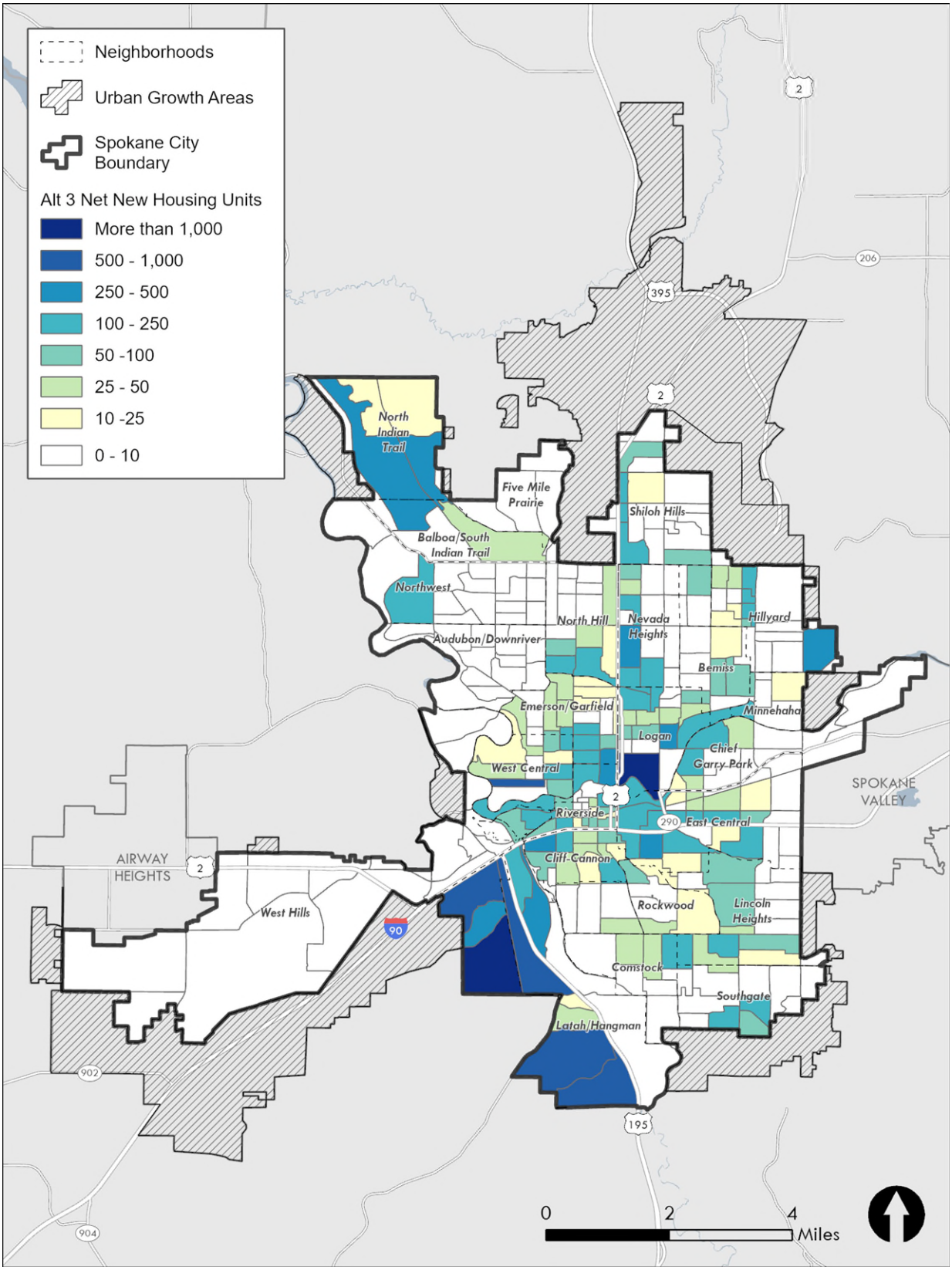
Alternative 2 – Distributed and Balanced: Housing



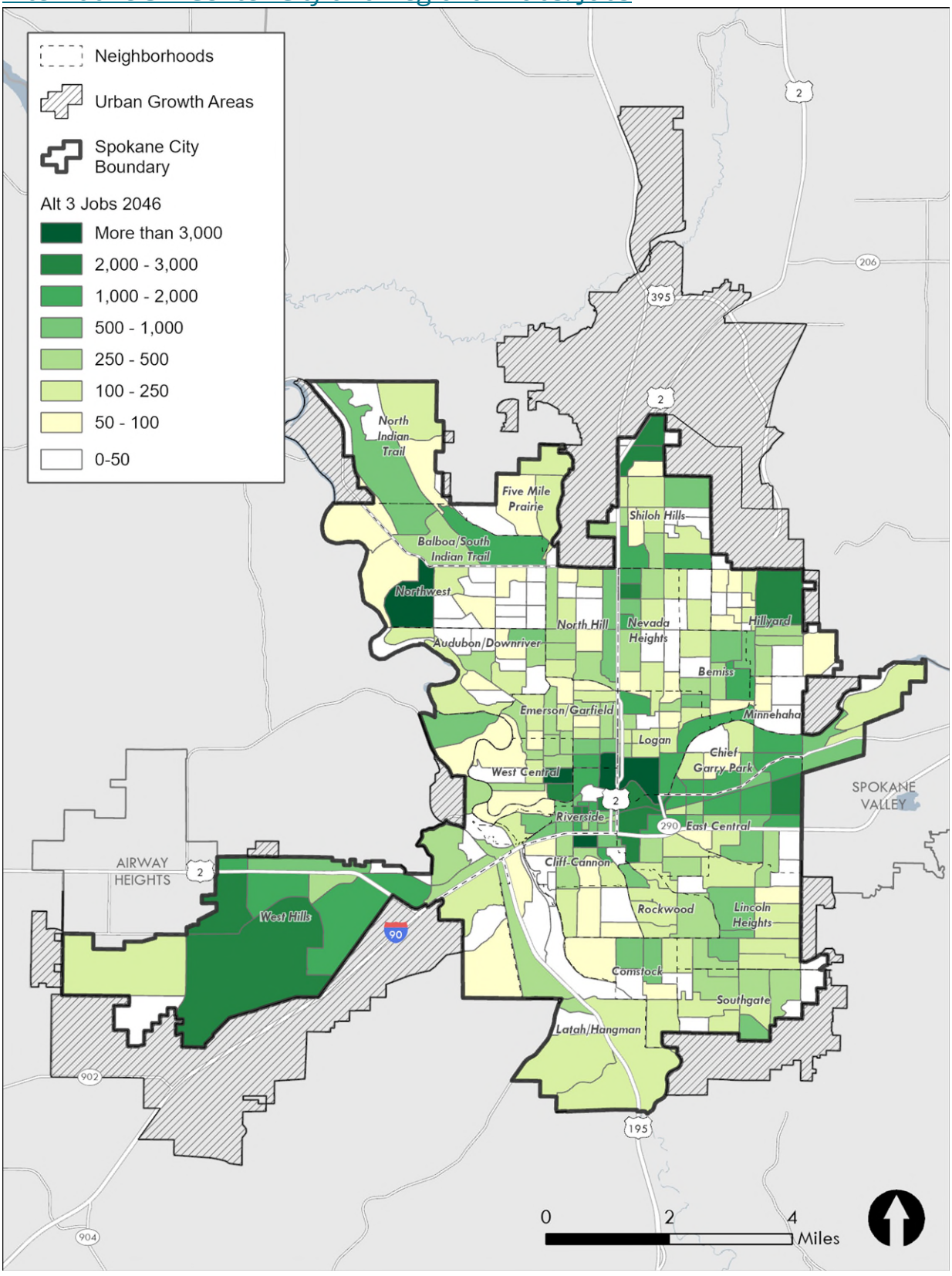
Alternative 2 – Distributed and Balanced: Jobs



Alternative 3 – Center City and Regional Hubs: Housing



Alternative 3 – Center City and Regional Hubs: Jobs



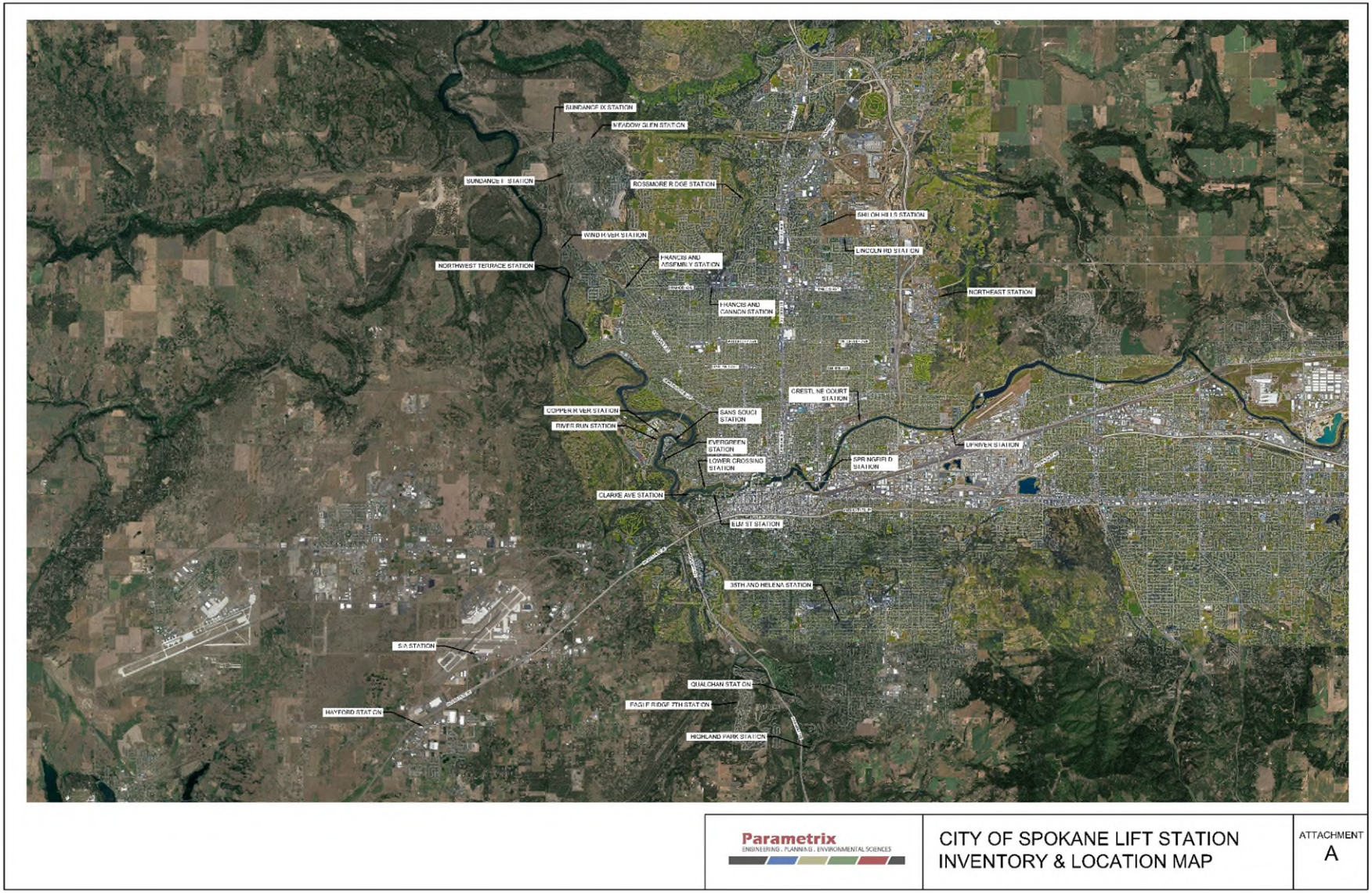
C Transportation Project Implementation Table

ID	Project	Scope / Description (one line)	Lead / Implemented By	Status	Funding Pathway
1	NSC North	North Spokane Corridor: Francis Ave → Spokane River	WSDOT	In progress / WSDOT program	State & federal
2	NSC South	North Spokane Corridor: Spokane River → I-90 (I-90 connection)	WSDOT	In progress / WSDOT program	State & federal
11	Bigelow Rd Extension	Straighten/extend Bigelow at Thierman; widen to 4 lanes	Spokane County	Planned / County program	County match, grants
19	Meadow Lane Rd J-Turns	J-turn configuration at Meadow Lane Rd	City of Spokane	Committed (2026)	Impact fees, grants, City match
21	Cedar Rd Realignment (Spokane)	Realign Cedar to Cheney-Spokane Rd; roundabout at new Marshall Creek intersection	City of Spokane	Developer-project	Developer mitigation
22	Inland Empire Reconnection	Reconnect Inland Empire Way to US 195 with NB on-ramp at Spring Creek	City of Spokane	Planned	Impact fees, grants, City match
23	Marshall Rd Activated (Spokane)	Pave Marshall Rd and build 44th	City of Spokane	Planned	Impact fees, grants, City match
24	12th: Deer Heights → Flint Rd (Spokane)	Construct new 12th Ave link	City of Spokane	Planned	Impact fees, grants, City match
29	Central Access Rd w/ Roundabouts	New N–S connection Hawthorne → Farwell (east of Costco)	Spokane County	Developer-delivered	Developer mitigation

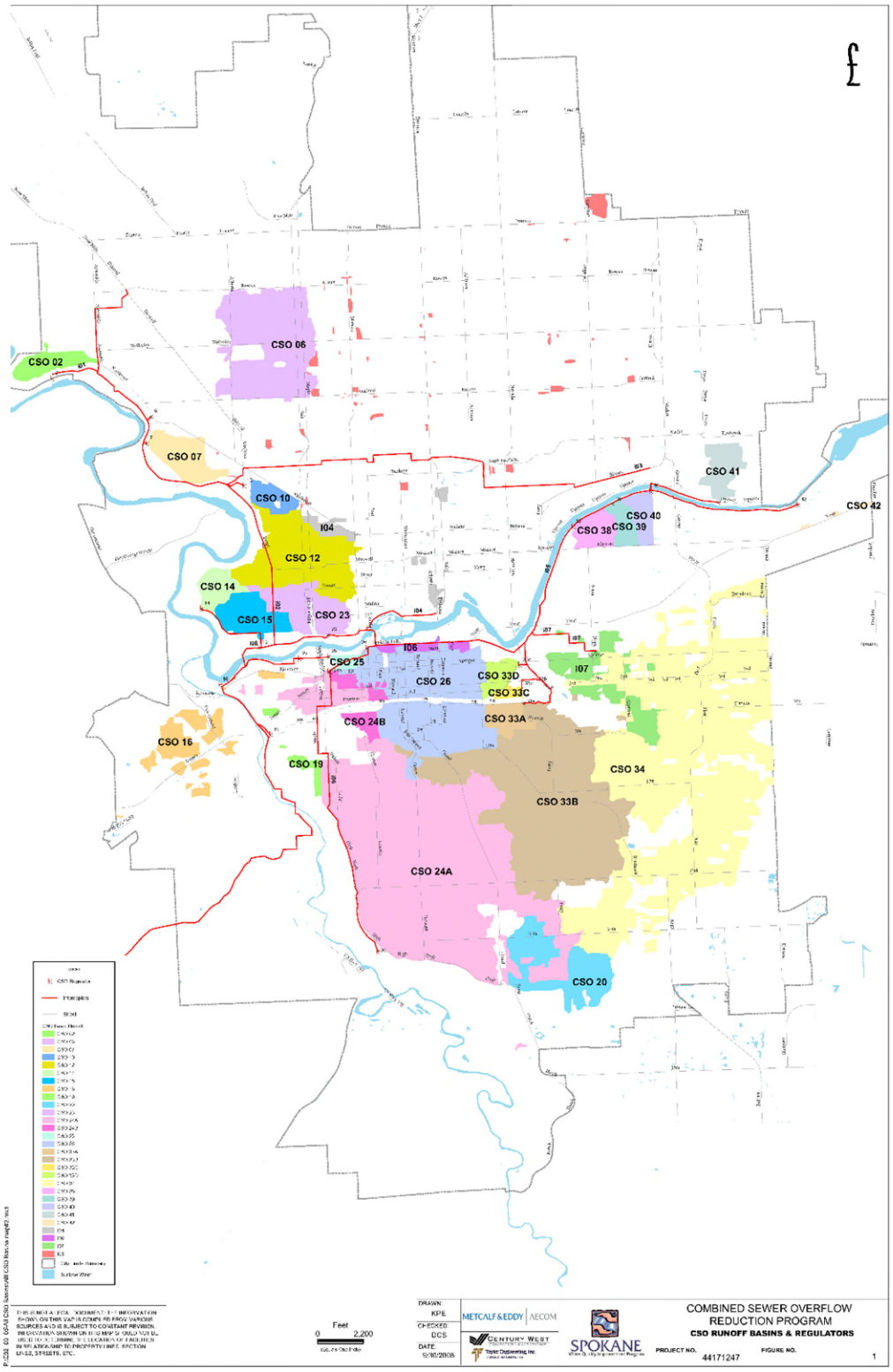
ID	Project	Scope / Description (one line)	Lead / Implemented By	Status	Funding Pathway
30	Craig & Thorpe Reconfiguration	Reconfigure offset intersection at Craig & Thorpe	Spokane County	Planned / Federal grant-seeking	Federal grant, local match
32	Thorpe & Lindeke Frontage Roundabout	New Lindeke Frontage (16th→Thorpe) + roundabout	City of Spokane	Planned	Impact fees, grants, City match
38	NSC Transit — Line 125	Transit service on/along NSC corridor	STA	Planned / STA plan	STA Moving Forward, grants
39	Division St BRT — Line 5	BRT on Division/Ruby with BAT segments & stations	STA (with City)	Planned/Advancing / STA plan	STA capital, grants; City ROW coordination
44	W 21st Ave: Flint → Deer Heights	Connector at W 21st from Flint to Deer Heights	City of Spokane	Partially complete / Developer-led	Impact fees, City match, developer mitigation, grants
45	Remove 16th ↔ US 195 Connection	Deactivate link; route to Thorpe/US 195	City of Spokane	Planned	Local revenue
49	Spotted Rd Realignment	Realign Spotted; overpass/interchange to Airport Dr; connect 18th/21st	Spokane Airports	Planned	Federal funding
50	US 2 / Campus Roundabout	Roundabout at US 2 & Campus; open south leg	City of Spokane	Planned	Impact fees, City match, grants
51	6th/12th Connection → Sunset Hwy	Connect 6th/12th (east end) to Sunset Hwy	City of Airway Heights	Planned	Grants & local match
58	US 2 / Spotted Roundabout	Roundabout at US 2 & Spotted	City of Spokane	Planned	Impact fees, City match, developer, grants

D Utility Maps

Lift Station Inventory



CSO Basin Sites



E Environmental Review Exemptions to Promote Infill Development and Housing

PLANSPOKANE
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Environmental Review Exemptions to Promote Infill Development and Housing

Prepared by: BERK Consulting, Inc. | December 2025

5.1 Introduction and Purpose

The City of Spokane is considering updating its thresholds for environment review consistent with the housing and infill exemption provisions of the State Environmental Policy Act (SEPA) at RCW 43.21c.229 which encourages development of housing and mixed-use development consistent with environmental evaluation of planned densities such as through an Environmental Impact Statement (EIS), allowing for less duplication of evaluation effort and time at the project level since regulations such as transportation concurrency, stormwater permits, critical areas regulations, shoreline regulations, and others are meant to protect the environment.

Another avenue for streamlined review under SEPA includes raising categorical exemptions in using flexible thresholds in state rules at WAC 197-11-800(1)(c) and (d). Spokane has raised exemptions higher than the minimum categorical exemption thresholds but not made full use of thresholds to limit review of minor new construction.

Under either of the SEPA exemption provisions, the City would help fulfill a strategy in its Housing Action Plan (2021) to streamline permitting for housing.[25]

The City of Spokane is preparing a new EIS for its Comprehensive Plan periodic update due in 2026 which evaluates new residential, mixed use, and employment uses in the city over the 2022-2046

[25] See: Spokane Housing Action Plan - City of Spokane, Washington.

period. The EIS also summarizes the federal, state, and local regulations that apply and serve as mitigation. The EIS process provides notices to agencies and Tribes of the intent to provide for these expanded exemptions and opportunities to comment.

This document outlines requirements, describes policies and regulations that mitigate impacts, and identifies potential infill exemption locations and phasing.

5.2 Exemption Types

5.2.1 Infill and Housing Exemptions

To accommodate infill development in urban areas not meeting the density goals of a Comprehensive Plan,[26] the City can establish an infill exemption where development that is consistent with City regulations is not required to undergo new environmental review, provided that the probable adverse environmental impacts have been adequately addressed by local regulations and that the City's Comprehensive Plan was previously subject to an Environmental Impact Statement (EIS). The City of Spokane is preparing a new EIS for its Comprehensive Plan periodic update due in 2026.

The provisions in RCW 43.21C.229 allow cities or counties (in urban growth areas) planning under the Growth Management Act (GMA) to exempt residential development and raise SEPA thresholds for:

- Residential development;
- Mixed-use development; or
- Commercial development up to 65,000 square feet, excluding retail development;

Senate Bill 5412 (2023) added a new section at RCW 43.21C.229(3) allowing cities or counties (in urban growth areas) to adopt a new SEPA exemption for all project actions proposing to develop housing units provided:

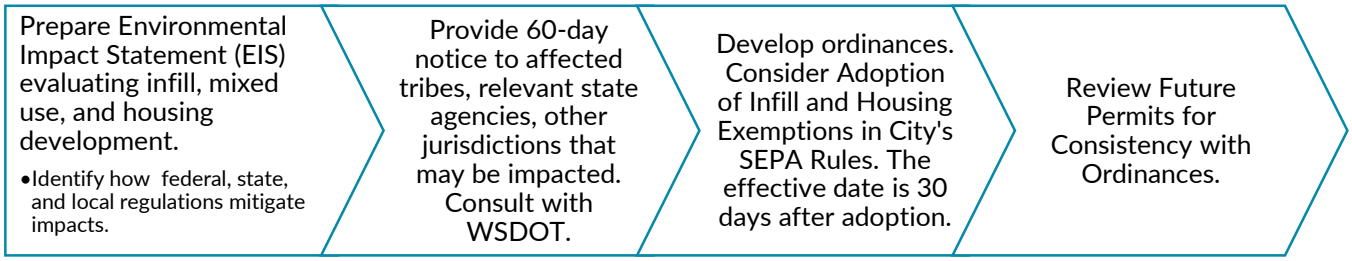
- the development is consistent with all development regulations implementing a GMA comprehensive plan;
- the development is consistent with the proposed use or density and intensity of use in the designated infill area;
- the EIS prepared for the exemption analyzes multimodal transportation impacts, including impacts to neighboring jurisdictions, transit facilities, and the state transportation system;
- the city or county has documented consultation with the Washington State Department of Transportation including consideration of whether mitigation is necessary for impacts to transportation facilities;

[26] Places where the current density and intensity of use in the area is roughly equal to or lower than called for in the goals and policies of the applicable comprehensive plan.

- the environmental analysis documents that the comprehensive plan, subarea plans, adopted regulations, and state and federal regulations adequately mitigate impacts in an environmental determination (e.g., EIS or determination of non-significance); and
- there is a 60-day notice to affected tribes, state agencies, and other jurisdictions and public before the environmental analysis is completed.

The Infill Exemption process is summarized in **Exhibit 1**.

Exhibit 1. Infill and Housing Exemption Process



Categorical exemptions adopted under RCW 43.21C.229 (3) become effective 30 days after the adoption of the enacting ordinance.

In the SEPA Handbook (2025)[27], the Washington State Department of Ecology recommends that the exemption clearly indicate:

- The level of residential or mixed-use development that will be exempt,
- The area where the exemption will apply, and
- How the exemption will be applied to a proposed project.

The Handbook also indicates that when an application for residential or mixed-use development is received by local government, the city must:

- Compare the proposal to the adopted categorical exemption.
- Ensure the proposed density or intensity of the development does not exceed the density/intensity levels established in the comprehensive plan.

This is consistent with WAC 197-11-800(6) that limits exemptions for rezones that require a Comprehensive Plan Amendment.

New Exemption in Station Areas

Based on a 2025 amendment under HB 1491, a new section (5) was added stating that all project actions that propose to develop residential or mixed-use development within a station area (along bus

[27] See: https://apps.ecology.wa.gov/publications/documents/2506009.pdf.

rapid transit such as the City Line in central Spokane) are categorically exempt from the requirements of this chapter, subject to the rules of the department adopted according to RCW **43.21C.110**(1)(a) that provide exceptions to the use of categorical exemptions adopted by the department. See "Exceptions to Exemptions" below. The Washington Department of Commerce is providing guidance on intensity of development in station areas, and exceptions, by 2027.

5.2.2 Flexible Categorical Exemption Thresholds in SEPA Rules

SEPA provides for minimum exemption levels for minor new construction, as well as flexible thresholds, where agencies may adopt the maximum level or a level between the minimum and maximum level in **Exhibit 2** in its SEPA rules, the City of Spokane has implemented 20% of single-family residential exemption thresholds and 10% of multifamily exemption thresholds.

Exhibit 2: Categorical Exemptions – State Rules and City Regulations

Project Type	SEPA Default Exemption Threshold WAC 197-11-800(1)(a)	SEPA Max. for Cities (Incorporated UGAs) WAC 197-11-800(1)(d)	City of Spokane Municipal Code Section 17E.050.070
Single family residential	4 units	30 units	20
Single family residential with the total square footage less than 1,500 square feet	4 units	100 units	20
Multifamily residential	4 units	200 units	20
Office, school, commercial (square feet) w/parking or stand-alone parking lot	4,000 sf 20 spaces	30,000 sf 90 spaces	12,000 square feet and 40 parking spaces
Landfill or excavation (cubic yds)	100	1,000	Up to 500 Cubic Yards

The City could adopt higher thresholds, which could vary by use or different geographic areas, and mixed-use projects.

To raise thresholds, the City would follow a process similar to that identified for the infill and housing exemption described earlier. The steps involve:

- *Documentation of Existing Federal, State, and Local Regulations:* Documentation that the requirements for environmental analysis, protection and mitigation for impacts to elements of the environment (listed in WAC 197-11-444) have been adequately addressed for the development exempted. The requirements may be addressed in specific adopted development regulations, and applicable state and federal regulations.

- *Documentation of Cultural and Historic Resources Regulations:* Document how specific development regulations and applicable state and federal laws provide adequate protections for cultural and historic resources. The local ordinance or resolution shall include, but not be limited to, the following:
  - Use of available data and other project review tools regarding known and likely cultural and historic resources, such as inventories and predictive models provided by the Washington department of archaeology and historic preservation, other agencies, and tribal governments.
  - Planning and permitting processes that ensure compliance with applicable laws including chapters 27.44, 27.53, 68.50, and 68.60 RCW.
- Local development regulations that include at minimum pre-project cultural resource review where warranted, and standard inadvertent discovery language (SIDL)[28] for all projects.
- *Transportation Outreach:* Document the result of its outreach with the Department of Transportation on impacts to state-owned transportation facilities, including consideration of whether mitigation is necessary for impacts to state-owned transportation facilities.
- *60-day Notice:* Before adopting the ordinance or resolution containing the proposed new exemption levels, provide a minimum of 60 days' notice to affected tribes, agencies with expertise, affected jurisdictions, the department of ecology, and the public and provide an opportunity for comment. The requirements for notice and opportunity to comment must be specifically documented.
- *Findings:* Description in the findings or other appropriate section of the adopting ordinance or resolution of the locally established notice and comment opportunities for the public, affected tribes, and agencies regarding permitting of development projects included in these increased exemption levels.

5.2.3 "Exceptions" to Exemptions

Regardless of which SEPA provision is implemented for changing exemptions, the categorical exemptions do not apply in the following cases when the project:

- Is undertaken wholly or partly on lands covered by water (WAC 197-11-756);
- Requires a license governing discharges to water that is not exempt under RCW **43.21C.0383** such as construction projects that are greater than 5 acres in size that require a NPDES construction stormwater permit;
- Requires a license governing emissions to air that is not exempt under RCW **43.21C.0381** regarding air operating permits, or WAC 197-11-800 (7) regarding open burning or (8) variance from clean air act requirements; or

[28] The State Department of Archaeology and Historic Preservation has recommended SIDL language, available at: https://dahp.wa.gov/archaeology/human-remains/recommended-inadvertent-human-remains-discovery-language.

- Requires a land use decision that is not exempt under WAC 197-11-800(6) such as rezones requiring a corresponding Comprehensive Plan Amendment.

5.3 City of Spokane Environmental Regulations

The State Environmental Policy Act (SEPA) was passed by the Washington State Legislature in 1971. The statute creates a review and evaluation framework centering on the identification and mitigation of impacts to the natural and built environment.

Numerous state and federal laws also require that cities like Spokane to adopt regulations protecting water quality, wetlands, streams, fish and wildlife, floodplains, archaeological and cultural resources, air quality, noise, transportation, building, fire protection, energy, and more. The City of Spokane has adopted numerous development regulations and can condition development through its permit review process. See **Exhibit 3**.

Exhibit 3: Element of the Environment and Plans and Codes that Protect Environmental Quality

Environmental Topic	Plans and Codes Addressing Environmental Topic
Earth	See Water regarding erosion control. In addition: ▶ Chapter 17E.040 Spokane Geologically Hazardous Areas ▶ Building and Construction Codes that regulate development in seismic hazard areas, Title 17F Construction Standards, Section 17F.040.105 Design Criteria
Air Quality	**Federal and State** ▶ NAAQS: The EPA enforces the CAA, which establishes the NAAQS for six criteria pollutants and sets emissions standards for vehicles and fuels, stationary industrial facilities, and hazardous air pollutants. ▶ Washington State: Ecology develops and implements plans to ensure compliance with NAAQS and has established state ambient air quality standards. Washington State has also enacted the Washington Clean Air Act. ▶ State Implementation Plan: The EPA reviews and approves Washington's State Implementation Plan, which provides tools to restore air quality and meet NAAQS when one or more pollutants are not in compliance. ▶ The State has enacted the Climate Commitment Act to cap and reduce statewide GHG emissions with a goal of achieving a 95% reduction by 2050. The State has also established the Clean Energy Transformation Act, which commits the state to emissions-free

Environmental Topic	Plans and Codes Addressing Environmental Topic
	electricity by 2045. The State's Clean Buildings Performance Standard, Clean Buildings Act, energy codes, and zero-emission vehicle standards will also help the State and Spokane reduce greenhouse gas emissions. **Regional/Local** ▶ Spokane Regional Clean Air Agency (SRCAA), Air Quality Regulations, and Federal Air Operating Permit (AOP) program, Notice of Construction (NOC) Permit, Portable Source Permit (PSP), Outdoor Burning requirements, Asbestos Requirements ▶ SRCAA Regulations: SRCAA's core air quality regulatory code—Regulation I—incorporates federal and state standards, while including specific requirements for air quality measures within the county. ▶ SRCAA is tasked with air quality monitoring, enforcement inspections, permitting, and outreach with Spokane County.
Water, ground and surface	**Federal** ▶ Clean Water Act, 33 United States Code (USC) 1251 et seq., including Sections 401—Water Quality Certification, 402—National Pollutant Discharge Elimination System, and 404—Permits for Dredge or Fill ▶ Coastal Zone Management Act, 16 USC 1451 et seq. ▶ Section 14 of the Rivers and Harbors Act of 1899, 33 USC 408 (Section 408) ▶ National Flood Insurance Act of 1968 and Flood Disaster Protection Act of 1973, 42 USC 4001 et seq. ▶ Floodplain Management Presidential Executive Order 11988 ▶ Endangered Species Act (ESA) Biological Opinion for the Implementation of the National Flood Insurance Program in the State of Washington (National Marine Fisheries Service 2008) ▶ Safe Drinking Water Act, 42 USC 300 et seq., Chapter 6A **State & Regional** ▶ Water Quality Standards for Surface Waters, Washington Administrative Code (WAC) 173201A ▶ Water Quality Standards for Groundwater, WAC 173-200 ▶ Flood Control Management Act, Revised Code of Washington (RCW) 86

Environmental Topic	Plans and Codes Addressing Environmental Topic
	▶ Water Pollution Control Act, RCW 90.48 ▶ Shoreline Management Act, RCW 90.58, WAC 173-26 ▶ National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit (Washington State Department of Ecology [Ecology], 2020) ▶ National Pollutant Discharge Elimination System (NPDES) Eastern Washington Phase II Municipal Stormwater General Permit (Ecology, 2024a) ▶ Stormwater Management Manual for Eastern Washington (Ecology Manual) (Ecology, 2024b) ▶ Washington State Department of Transportation (WSDOT) Highway Runoff Manual (WSDOT, 2019a) ▶ WSDOT Hydraulics Manual (WSDOT, 2024) ▶ WSDOT Temporary Erosion and Sediment Control Manual (WSDOT, 2019b) ▶ Washington State Hydraulic Code, WAC 220-660 **Local** Chapter 17E.010 Critical Aquifer Recharge Areas – Aquifer Protection Chapter 17E.030 Floodplain Management Chapter 17E.060 Shoreline Regulations Chapter 17E.070 Wetlands Protection Chapter 17D.060 Stormwater Facilities Chapter 17D.090 Erosion and Sediment Control Spokane Regional Stormwater Manual (Spokane et. al., 2008) Standards include: 1. Standard Specifications of the Washington State Department of Transportation, latest edition. 2. General Special Provisions of the City of Spokane, latest edition. 3. City of Spokane Design Standards and Standard Plans, latest edition. 4. The Spokane Regional Stormwater Manual (SRSM), latest edition. 5. Spokane Aquifer Water Quality Management Plan. Spokane County, Washington “208” Program. County engineers’ office. 6. Stormwater Management Manual for Eastern Washington (SWMMEW), Washington State Department of Ecology, latest edition. Spokane Aquifer Joint Board Wellhead Protection Program

Environmental Topic	Plans and Codes Addressing Environmental Topic
Plants and Animals	**Federal** ▶ Endangered Species Act (ESA): Provides a framework to conserve and protect endangered and threatened species and their habitats from a project's effects. Section 7 of the ESA requires federal agencies to ensure that their actions do not jeopardize the existence of listed species or destroy or adversely modify designated critical habitat. The ESA is administered by the U.S. Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration National Marine Fisheries Service (NOAA Fisheries, or NMFS). ▶ Migratory Bird Treaty Act of 1918: Protects migratory birds, making it illegal to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under a valid federal permit from USFWS. ▶ Bald and Golden Eagle Protection Act of 1940: Prohibits "take," including parts (including feathers), nests, or eggs of bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*). ▶ Section 404 of the Clean Water Act: Requires authorization from the Secretary of the Army, acting through the Corps of Engineers (USACE), for the discharge of dredged or fill material into all waters of the United States, including wetlands. A permit is required whether the work is permanent or temporary. **State** ▶ Chapter 220-610 WAC, State and Protected Species: Identifies the federal ESA-listed species that are present in Washington and establishes closed seasons and penalties for take of federally listed fish species. It also identifies and classifies native wildlife species needing protection in Washington; defines the listing, management, recovery, and delisting processes; and establishes rules for bald eagle management in Washington. ▶ Chapter 77.12.020 RCW, Wildlife to be classified: Empowers the director of the Washington Fish and Wildlife Commission to determine whether a species should be managed by WDFW, and to classify it as protected, endangered, or as deleterious exotic wildlife that is dangerous to the environment or wildlife of the state. ▶ Chapter 77.55 RCW, Construction Projects in State Waters: Requires a Hydraulic Project Approval (HPA) from the Washington Department

Environmental Topic	Plans and Codes Addressing Environmental Topic
	of Fish and Wildlife WDFW for any work that uses, diverts, obstructs, or changes the natural flow or bed of any fresh water or saltwater of the state of Washington, including wetlands. ▶ Chapter 220-640 WAC, Invasive/Non-native Species; Chapter 17.10 RCW, Noxious Weeds—Control Boards; and Chapter 16-750 WAC State Noxious Weed List and Schedule of Monetary Penalties: Establish the framework for regulating and controlling noxious weeds in the state of Washington and designate the list of noxious weeds that pose threats statewide and regionally. **Local** ▶ Chapter 17E.020 Fish and Wildlife Conservation Areas ▶ Chapter 17E.060 Shoreline Regulations ▶ Chapter 17E.070 Wetlands Protection
Energy and Natural Resources	**Federal** ▶ National Electrical Code, as adopted by the National Fire Protection Association **State** ▶ 2019 Washington State Clean Energy Transformation Act, amending portions of RCW Titles 19 (Business Regulations – Miscellaneous), 43 (State Government – Executive), 80 (Public Utilities), and 82 (Excise Taxes) to commit Washington to an electricity supply free of greenhouse gas emissions by 2045. ▶ Washington State Energy Code, WAC Title 51, Chapters 11C and 11R **Local** ▶ Electric Service Requirements administered by Avista ▶ Section 17F.040.010 Adoption of Building Codes and Related Washington State Codes, International Energy Conservation Code, current adopted Edition, chapter 51-11C and 51-11R WAC. ▶ Section 12.05.030 Sustainable Public Buildings Requirements
Environmental Health	**State** ▶ Model Toxics Control Act (MTCA) - Chapter 70A.305 RCW (MTCA law) ▶ MTCA Cleanup Regulations - Chapter 173-340 WAC (MTCA rule, also known as the MTCA Cleanup Rule)

Environmental Topic	Plans and Codes Addressing Environmental Topic
	▶ Sediment Management Standards - Chapter 173-204-WAC (SMS rule, also known as the Sediment Cleanup Rule) ▶ Washington's hazardous waste management law and dangerous waste regulations. **Local** ▶ Chapter 17F.080 Fire Code ▶ Chapter 10.70 Noise Control, including Section 10.70.070 Maximum Permissible Environmental Sound Levels ▶ Chapter 12.03 Airport Regulations ▶ Chapter 17C.182 Fairchild Overlay Zones ▶ See also air quality.
Land and Shoreline Use	▶ Title 17B Comprehensive Plan and Sub-area Plans ▶ Title 17C Land Use Standards ▶ Title 17D City-wide Standards ▶ Title 17E Environmental Standards including Chapter 17E.060 Shoreline Regulations
Aesthetics	▶ Chapter 17C.160 North River Overlay District, Section 17C.160.020 Views, Vistas and Site Coverage Design ▶ Section 17C.124.585 Jefferson Street & Spokane County Courthouse View Corridor ▶ Chapter 17C.250 Tall Building Standards
Light and Glare	▶ Chapter 17C.111 Residential Zones, Section 17C.111.520 Lighting, Section 17C.111.420 Open Spaces ▶ Chapter 17C.123 Form Based Code Zones, Section 17C.123.050 Parking and Pedestrian Connectivity ▶ Chapter 17G.070 Planned Unit Developments, Section 17G.070.150 Lighting ▶ Chapter 17C.180 Airfield Overlay Zones, and Chapter 17C.182 Fairchild Overlay Zones ▶ Chapter 17E.060 Shoreline Regulations (multiple districts address Dark Sky)
Parks and Recreation	▶ Open space per unit: Chapter 17C.111 Residential Zones ▶ Plazas and Open Spaces: Chapter 17C.120 Commercial Zones ▶ Spokane Parks Master Plan: https://my.spokanecity.org/parksrec/master-plan/

Environmental Topic	Plans and Codes Addressing Environmental Topic
Historic and Cultural Preservation	**Federal and State** Federal and state laws govern the designation and protection of cultural resources, including but not limited to: ▶ National Historic Preservation Act (NHPA) of 1966, as amended, known as Section 106, has implementing regulations (36 CFR Part 800), that require federal agencies, or those receiving federal grants or funds, or a federal permit or license, to identify historic properties, assess adverse effects, and resolve those adverse effects. ▶ Archaeological Resources Protection Act (ARPA) of 1979 protects archaeological resources. ▶ National American Graves Protection and Repatriation Act (NAGPRA) creates protections for Native American burial sites, remains, and cultural objects. ▶ Washington Executive Order 21-02 (formerly 05-05) requires that impacts to cultural resources must be considered as part of any state-funded project or investment and must include consultation with DAHP and with Tribal governments. ▶ Washington State law (RCW 27.53 and 27.44) protects archaeological resources (RCW 27.53) and Indian burial grounds and historic graves (RCW 27.44) located on both the public and private lands of the State. ▶ An archaeological excavation permit issued by the Washington State Department of Archaeology and Historic Preservation (DAHP) is required in order to disturb an archaeological site. ▶ Knowing disturbance of burials/graves and failure to report the location of human remains are prohibited at all times (RCW 27.44 and 68.60). **Local** Shorelines: Section 17E.060.160 Archaeological and Historic Resources The City's Shoreline Master Program (Section 5.2.4 Historic or Archeological Impacts) includes regulations regarding stop work and studies if cultural resources are encountered: ▶ For any use, activity or development, the project proponent, agent, or applicant shall notify the Spokane Historic Preservation Office and the Director whenever any archaeological or historical artifacts or cultural resources are encountered during any grading or excavation. All work on the project site shall cease immediately.

Environmental Topic	Plans and Codes Addressing Environmental Topic
	▶ Work may resume only after the applicant, project proponent, or agent and the Spokane Historic Preservation Office, the Washington State Department of Archaeology and Historic Preservation, and appropriate Tribal entities agree in writing on measures to protect potentially affected archaeological or historic artifacts or cultural resources. ▶ Spokane's zoning code includes Chapter 17D.100 Historic Preservation, which addresses the nomination of historic landmarks or districts. If there is a request for the demolition of an historic landmark or a contributing building located within a local historic district, the City's Historic Preservation Officer and the Spokane City/County Historic Landmarks Commission reviews the proposal against criteria. The code also contains incentives such as façade, utility, and sidewalk grants to support preservation. Section 17D.100.230 of the Spokane Municipal Code specifically addresses demolition permits for historic structures located within the downtown boundary area, National Register historic districts, and centers and corridors, which were recently incorporated into the ordinance (Spokane City/County Historic Preservation Office, 2024). ▶ Chapter 17C.335 Historic Structures – Change of Use The Draft EIS identifies potential mitigation measures such as applying shoreline master program requirements citywide and developing a decision tree guiding the amount of documentation and consultation depending on the potential risk of uncovering cultural resources.
Transportation	Spokane's existing regulatory framework ensures that transportation improvements keep pace with growth and safety needs. Concurrency and impact fees link development to capacity projects. When thresholds are exceeded, intersection and corridor upgrades are advanced as part of the City's capital program. Frontage improvement requirements ensure that adjoining sidewalks, curb ramps, crossings, and bike elements are implemented to current standards as sites redevelop. ▶ Chapter 17G.010 Building and Construction Permits ▶ Chapter 17H.010 Street Development Standards ▶ Chapter 17H.020 Complete Streets Program ▶ Chapter 17D.075 Transportation Impact Fees: Spokane's transportation impact fee program links new development to delivery of transportation network improvements identified in the City's capital/impact-fee project lists. Fees collected at permitting are restricted to eligible capacity and safety projects, so investments are

Environmental Topic	Plans and Codes Addressing Environmental Topic
	made where growth occurs. Because the program is district-based, revenues generated in growth areas can be directed to corridor and intersection improvements that support concurrency and mitigate impacts discussed within this EIS. In the West Plains, impact fees are programmed to construct parallel roadways to US 2/Sunset Highway, which will enhance east-west mobility as employment expands in the area. In South Spokane, impact fees are programmed to convert S Hatch Road and E 57th Avenue from side-street stop control to a signal or roundabout, reducing delay and improving safety for all users. ▶ Chapter 17C.420 South Logan TOD Planned Action
Public Services ▶ Fire ▶ Police ▶ Schools	▶ Fire: Chapter 17F.080 Fire Code ▶ Fire: Chapter 17F.110 International Wildland-Urban Interface Code ▶ Fire/Police: An increase to local sales and use tax to support a Public Safety Tax for criminal justice and fire protection became effective April 1, 2025. ▶ Schools: The City addresses school demand and facilities in its Capital Facilities Plan. The City implements safe routes to schools as part of land use permit review.
Utilities ▶ Water ▶ Stormwater ▶ Sewer ▶ Solid Waste	**Federal** ▶ Safe Drinking Water Act, 42 USC 300 et seq., Chapter 6A, administered but the U.S. Environmental Protection Agency ▶ Clean Water Act, 33 United States Code (USC) 1251 et seq., including Section 402 – National Pollutant Discharge Elimination System (NPDES) **State** ▶ Washington State Department of Ecology, WAC Title 173, Chapters 200-270, which includes administration of the NPDES program, discharge and effluent standards, the waste discharge general permit program, construction of wastewater treatment plants, and construction and operation of combined sewer overflow reduction facilities ▶ NPDES Wastewater Discharge Permit program, administered by the Washington State Department of Ecology ▶ Wastewater Collection System Consent Decree, administered by the Washington State Department of Ecology and U.S. Environmental Protection Agency

Environmental Topic	Plans and Codes Addressing Environmental Topic
	▶ Water Systems, WAC Title 246, Chapters 290-296, administered by the Washington State Department of Health ▶ NPDES Industrial Stormwater General Permit, administered by the Washington State Department of Ecology ▶ Stormwater Management Manual for Eastern Washington, administered by the Washington State Department of Ecology ▶ Washington State Hydraulic Code, WAC Title 220, Chapter 660, administered by the Washington Department of Fish and Wildlife **Local** Chapter 17G.010 Building and Construction Permits, including concurrency with utilities Title 13 Public Utilities and Services ▶ Chapter 13.02 Solid Waste ▶ Chapter 13.03 Sewers ▶ Chapter 13.035 Water-Wastewater Rates ▶ Chapter 13.03A Pretreatment ▶ Chapter 13.04 Water ▶ Chapter 13.08 Utility Cost Recovery Methods

5.4 Potential Infill Exemption Location

To streamline development under SEPA exemptions, the City could consider a phased approach:

- Phase 1 infill exemption area: These are areas in the city that are already urbanized with less environmental constraints and with greater access to multimodal transportation including transit. These have opportunities for residential, mixed use, and small-scale commercial infill and redevelopment to meet the City's housing and job needs.
- Phase 2 infill exemption area: These are areas in the balance of the city limits that are developing where there is less infrastructure. The City would have a greater understanding of the conditions of approval needed in its standard permit process once the transportation impact fee and associated updated Transportation Improvement Program are amended to implement the Comprehensive Plan periodic update including the City's multimodal levels of service.

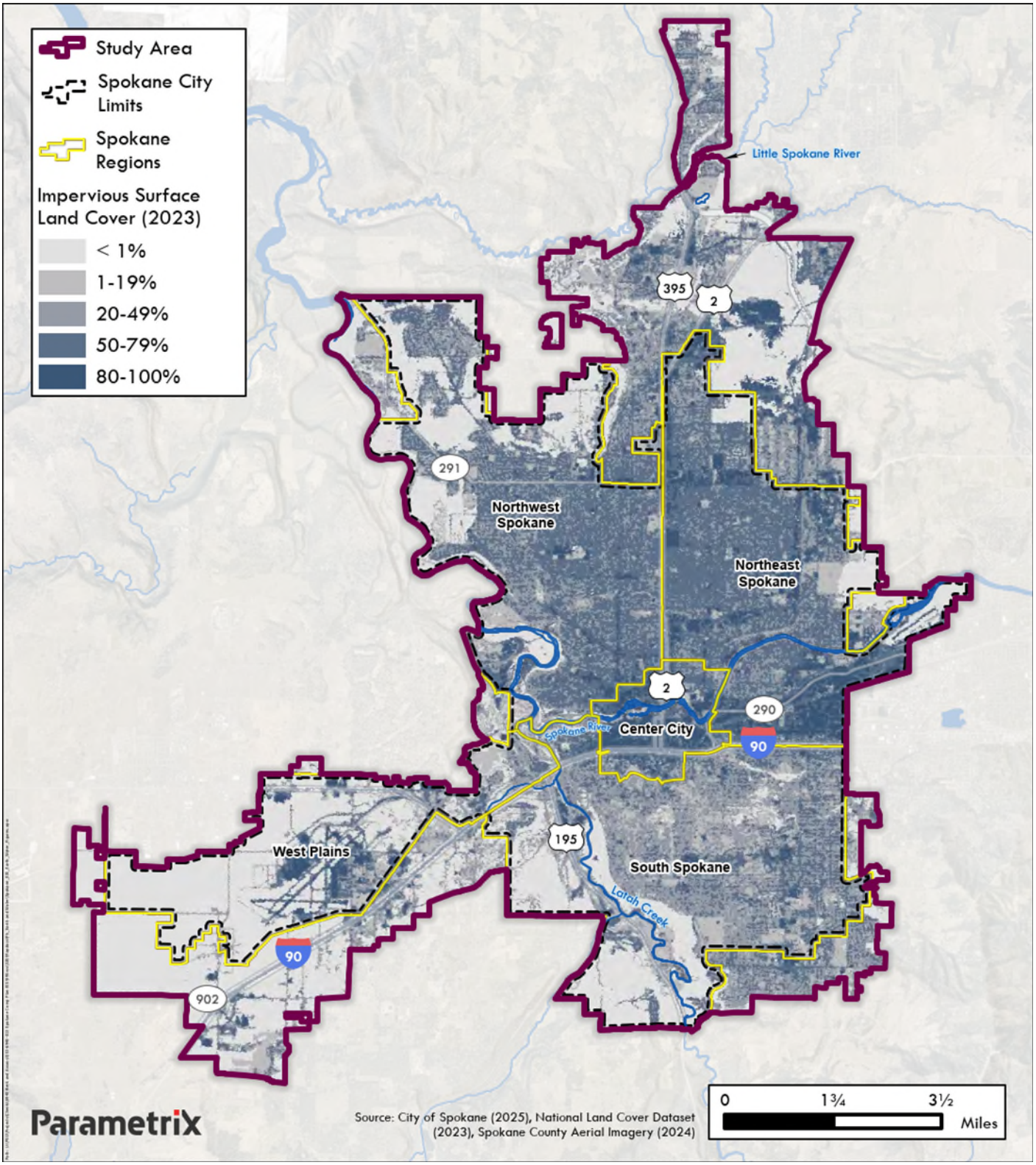
Maps informing the phases are included on the following pages:

- Exhibit 4: Existing Hard (Impervious) Surfaces (2023)
- Exhibit 5: EIS Study Areas with Frequent Transit Routes (2025)
- Exhibit 6: Access to Frequent Transit within a Half and Quarter Mile Distance (2025)

Preliminary Phase 1 boundaries are included for consideration during the Draft EIS comment period:

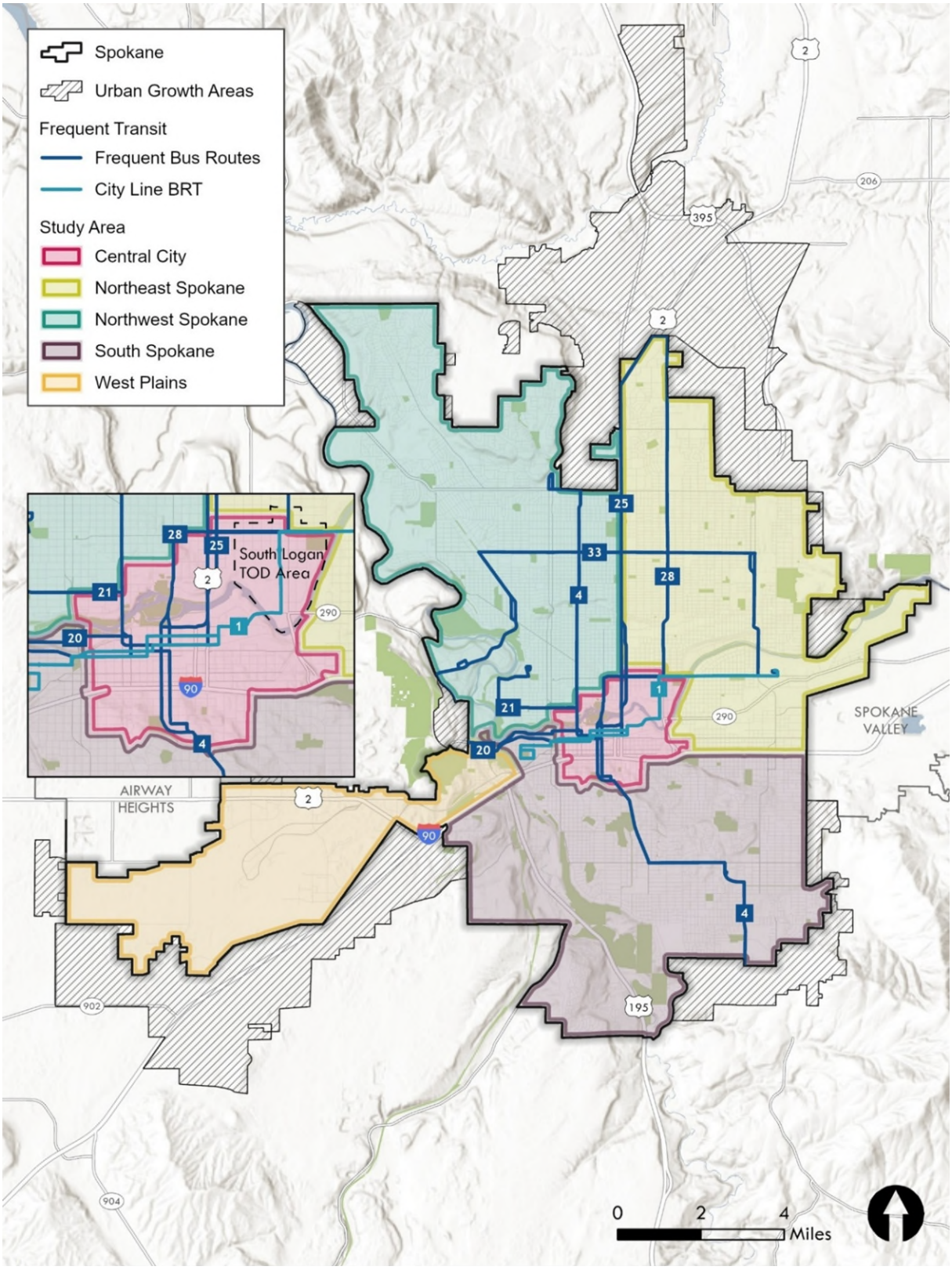
- Exhibit 7: Phased SEPA Proposed Infill /Categorical Exemption Area

Exhibit 4: Existing Hard (Impervious) Surfaces (2023)



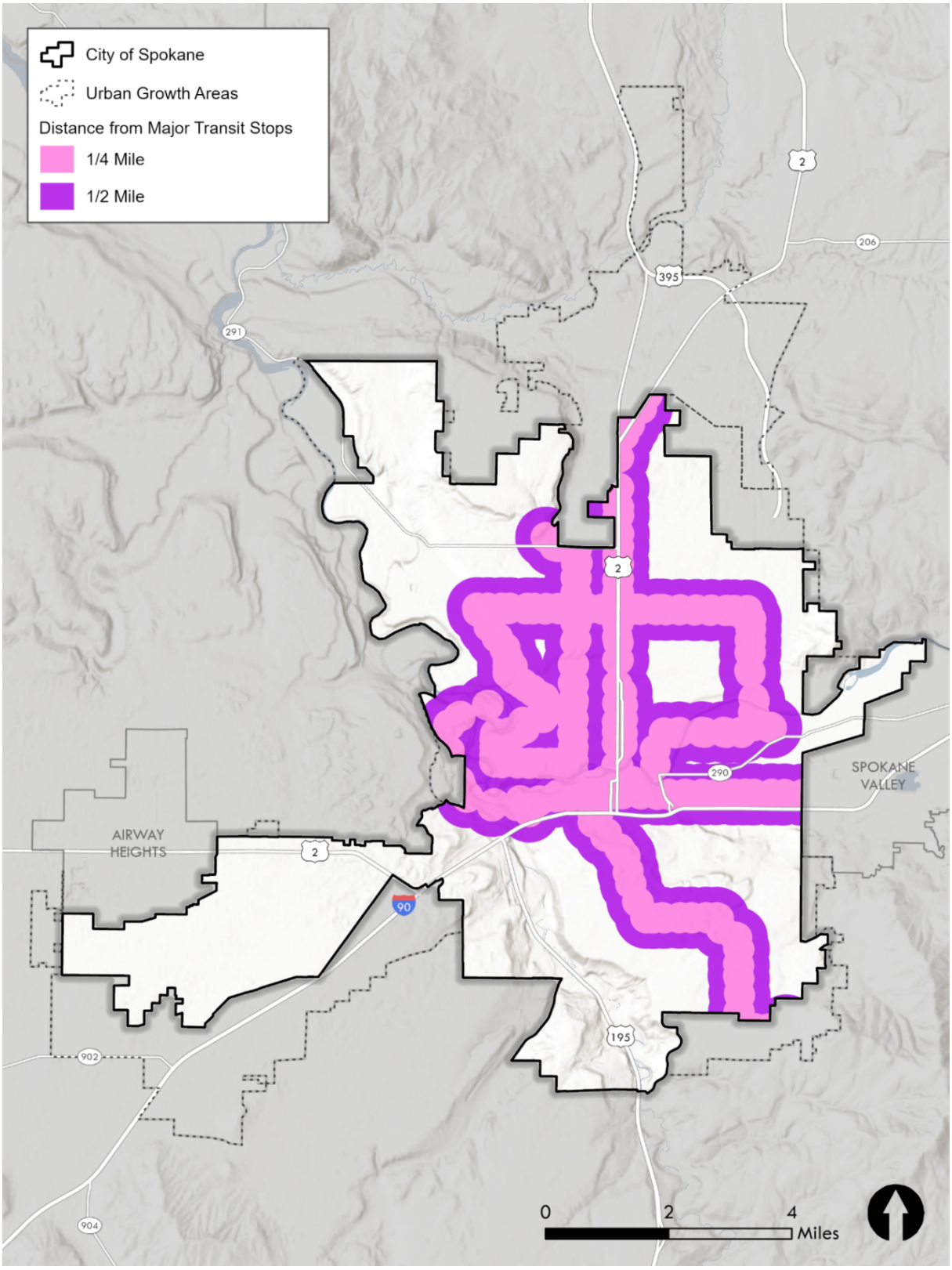
Sources: City of Spokane, 2025; National Land Cover Dataset, 2023; Spokane County Aerial Imagery, 2024.

Exhibit 5: EIS Study Areas with Frequent Transit Routes (2025)



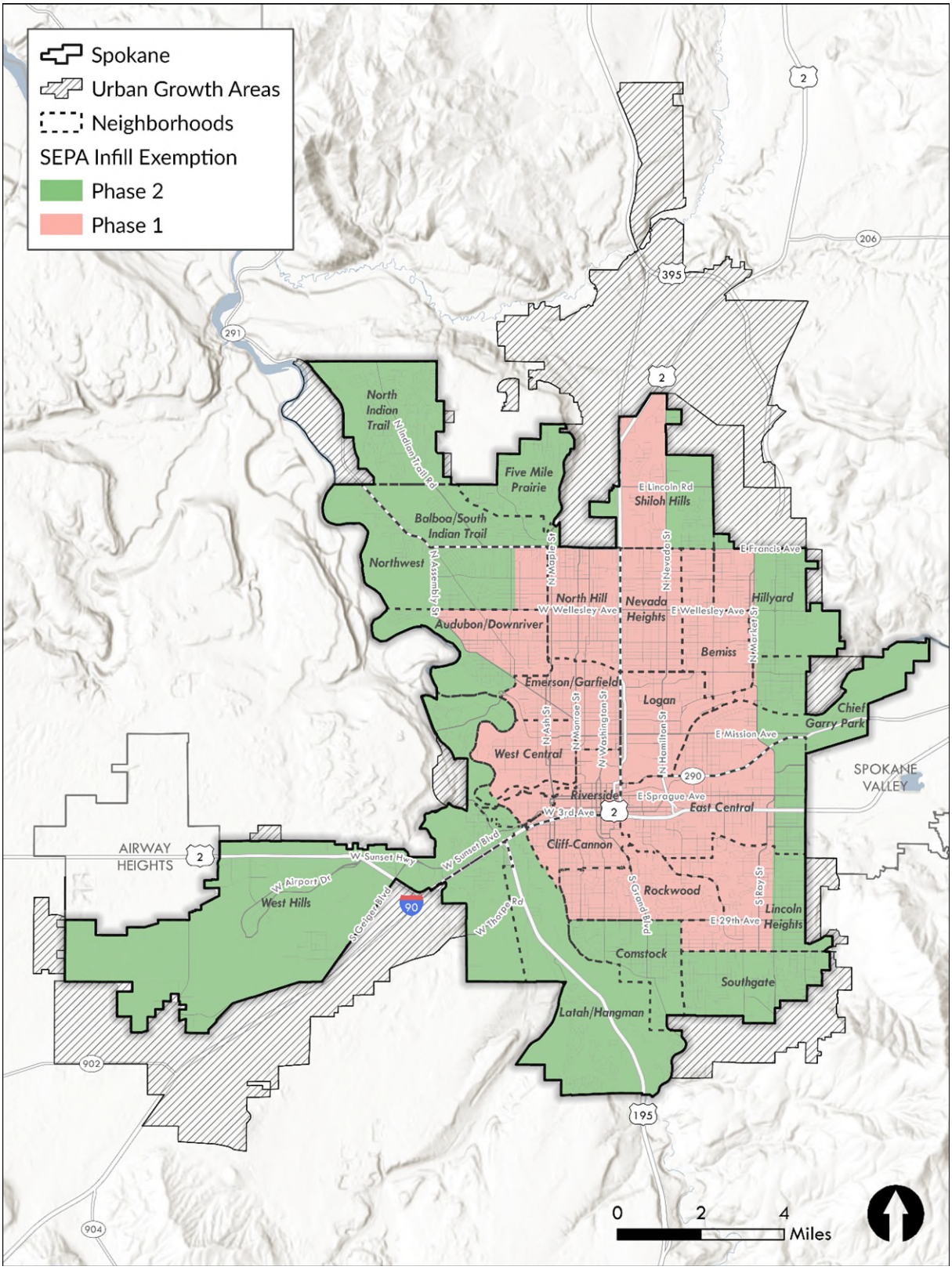
Source: City of Spokane, BERK, 2025.

Exhibit 6: Access to Frequent Transit within a Half and Quarter Mile Distance (2025)



Source: City of Spokane, BERK, 2025.

Exhibit 7: Phased SEPA Proposed Infill /Categorical Exemption Area



Source: City of Spokane, BERK, 2025.