6 Appendices

6 Appendices 6-1

A Scoping and Public Outreach 6-3
B Alternative Growth Assumptions for Transportation Model 6-4
C Transportation 6-36
D Utility Maps 6-141
E Environmental Review Exemptions to Promote Infill Development and Housing 6-146
F PlanSpokane Transportation Coordination & Consultation 6-167
G Marked Comment Letters 6-170

A Scoping and Public Outreach

NOTE: *Updated list with the Final EIS.*

- 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
- 2025 Community Engagement Summary
- August 7 through October 2, 2026 PlanSpokane 2046 Future Land Use Map StoryMap and updated Draft Comprehensive Plan, at https://my.spokanecity.org/planspokane/.

B Alternative Growth Assumptions for Transportation Model

NOTE: *Draft EIS appendix included TAZ maps. Final EIS appendix adds tables of assumptions reflected in TAZ maps and adds information for the Preferred Alternative.*

MEMORANDUM

Date: January 9, 2026, Updated October 5, 2026

To: Tirrell Black, Assistant Planning Director, City of Spokane

cc: KayCee Downey, Planner II, City of Spokane

From: Lisa Grueter, AICP, Principal, BERK; Kevin Gifford, Associate Principal, BERK

RE: PlanSpokane 2046 Environmental Impact Statement – Alternative Growth Assumptions for Transportation Model

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Introduction

This memo summarizes the methodology to prepare growth assumptions for the alternatives evaluated in the PlanSpokane 2046 Draft Environmental Impact Statement (EIS) and Final EIS. The growth assumptions were distributed into traffic analysis zones in order for them to be evaluated in the transportation model used by the City's transportation consultant Fehr & Peers.

Alternatives

The City of Spokane is updating its Comprehensive Plan in accordance with the Growth Management Act (GMA).

The City is studying three Alternatives in the Draft EIS described below:

- **Alternative 1 Stay the Course:** This State Environmental Policy Act (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.

- **Preferred Alternative:** The Preferred Alternative blends features of Alternatives 1, 2, and 3. Like Alternative 3, the Preferred Alternative focuses housing growth in major hubs, particularly in the Center City. Like Alternative 2, the Preferred Alternative designates mixed use and housing growth along bus rapid transit lines and corridors that have frequent transit. The Preferred Alternative meets housing targets at all income levels and provides a greater range of housing types such as low- and mid-rise housing in addition to middle housing. Like Alternative 1, the Preferred Alternative includes the regional transportation plan jobs allocation with a focus in the Center City, Hillyard, and West Plains areas.

More detailed descriptions of the alternatives and the associated conceptual growth maps are shared in the EIS and associated summaries and a Story Map at this link: https://my.spokanecity.org/planspokane/.

Growth Distribution Methodology

Growth Targets and Assumptions

Background

The Comprehensive Plan must demonstrate consistency with population and housing growth targets for the horizon year of 2046, which are allocated through a regional process with Spokane County and cities including the City of Spokane. The City of Spokane's regionally allocated housing target for the years 2020-2046 is 22,359 new dwelling units.

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).

The City is also required to ensure that transportation and other capital facilities support planned land use growth. The City's Comprehensive Plan must also be certified by the Spokane Regional Transportation Council (SRTC). The SRTC has developed a regional travel demand model and associated growth assumptions for the years 2022-2050.

Growth Distribution Assumptions

Base and Horizon Year: For the purposes of the growth assumptions, the base year used was 2022 to match the SRTC model base year.

Housing Target and Allocation: Excluding permitted dwellings in the years 2020-2021 results in an adjusted housing target of 21,738. The current Comprehensive Plan has capacity to meet this growth target, except it does not have sufficient capacity for housing types that are affordable to households earning up to 80% of the area median income. These more affordable housing types are low-rise and mid-rise attached apartments. Each alternative assumes the same target for the 2022-2046 period. Alternative 1 retains the growth distribution assumed under the current plan and is reflective of Horizon 2050 assumptions in the SRTC model. Alternatives 2, 3 and the Preferred Alternative vary the distribution of growth based on adding locations for moderate and high density residential and mixed-use patterns to meet all income levels required.

Considerations in allocating the housing for Alternatives 2, 3, and the Preferred Alternative:

- Tagged each TAZ with the conceptual mix of growth in Alternatives 2, 3, and the Preferred Alternative (e.g., if conceptual growth identified moderate density, high density, mixed use, or employment overlapping the TAZ).
- Started with a baseline allocation of units distributed according to the City's land capacity analysis (https://static.spokanecity.org/documents/planspokane/2025-land-capacity-analysis.pdf).
- Identified units in the permit pipeline from preliminary plats and PUDs.
- Identified subareas where growth had been under study or recently adopted in a subarea plan (e.g., South Logan, Hillyard, 5th Avenue, Latah) to set subarea assumptions.
    - South Logan: Relies on the preferred alternative studied in the Subarea Plan EIS (2,954 by 2047).
    - Hillyard: Considers the subarea plan and market study.
    - 5th Avenue: City provided information on permit pipeline and potential areas of mixed use.
    - Latah: Considered pipeline development, and growth capacity estimated in City's land capacity analysis, adjusted for the City's market factor. Considered growth between 2025-2050 in the SRTC model and maintained this estimate for the 2022-2046 period for Alternatives 2 and 3 for a conservative analysis (though some units move around in TAZs but overall is same in the Latah area). The assumption was about 4,530 units about 20% of the allocated growth.
- Considered the City's affordable housing gap analysis and locations of housing stock affordable at 0-80% area median income (https://my.spokanecity.org/planspokane/housing-needs/accommodating-affordable-housing/).
- Reviewed City staff identification of areas where City anticipates zero growth or where there would be zero residential growth, but jobs are possible. Some TAZs were "split" for visualization purposes so that growth could be shown in more appropriate locations on the TAZ or hexagon growth maps where TAZs were large.

- Based on the above information and conceptual alternative growth pattern, BERK Consulting, Inc. (BERK) made manual increases or decreases, and adjusted growth to meet the housing target level. BERK split Single Family and Multifamily units considering concepts and meeting HB 1220 targets.
- See Attachment A for the comparison of alternative features, Attachment B for maps showing the net housing growth distribution by TAZ, and Attachment C for a table listing the net housing growth by TAZ. Net housing growth is shown to match the housing growth target that is a net number. The housing assumptions are for the city limits only and do not show additional housing assumed to occur in the county in TAZs that straddle the city and unincorporated areas.
- TAZs that straddled the city limits and unincorporated county lands were flagged for the transportation modelers to ensure growth outside the city limits was cumulatively included in the TAZ when adding the City's net housing growth (by alternative) into the SRTC model.
- The methodology produced fractional numbers and modelers subsequently made the figures whole numbers.

Employment Assumptions and Allocations: 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 SRTC.

- Alternative 1 and the Preferred Alternative maintain the SRTC job distribution.
- Alternative 2 proportionally reduces jobs to the Employment Security Department (ESD) projection level and allocates jobs to corridors or other areas identified on the conceptual map.
- Alternative 3 scales jobs up from Alternative 1 and allocates to the centers/hubs/corridors identified on the conceptual map.
- See Attachment A for the comparison of alternative features, Attachment D for maps showing the total jobs distribution by TAZ, and Attachment E for a table listing the total jobs by TAZ.
- Modelers subsequently made fractional figures whole numbers.

Attachment A: Comparison of Alternative Features

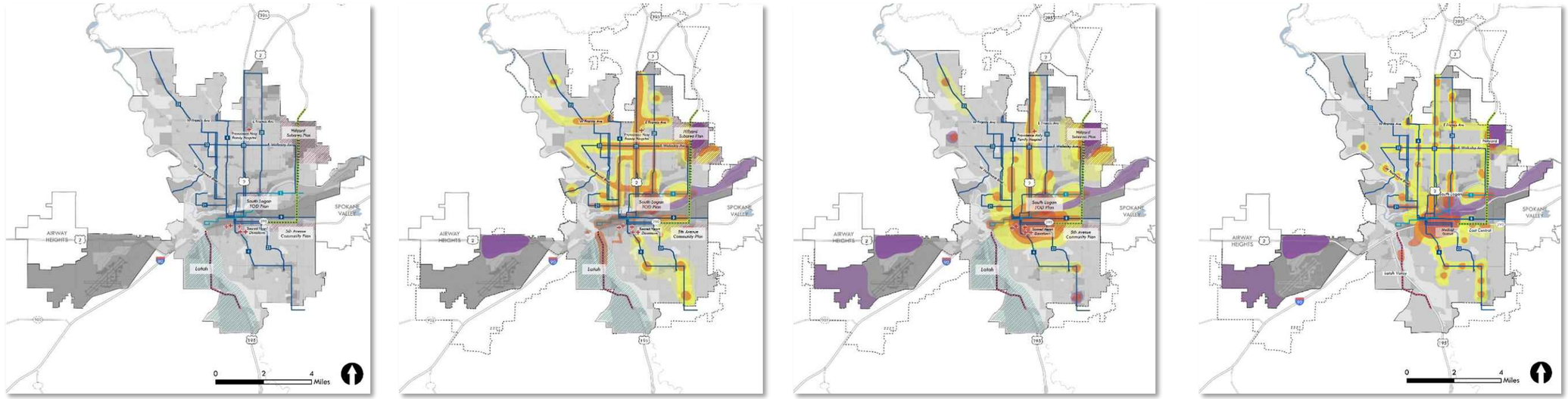
	Alternative 1: Stay the Course	**Alternative 2: Distributed and Balanced**	**Alternative 3: Center City and Regional Hubs**	Preferred Alternative
Plan & Code Update	Current	Periodic Update	Periodic Update	Periodic Update
Areas of Focus for Growth	Focuses growth in Downtown and Centers and Corridors.	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.	Combination of Alternatives 2 and 3 – development along frequent transit corridors and growth in hubs. 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. 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 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**	Preferred Alternative
Job Projections 2022-2046	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.	34,850 net jobs Regional SRTC Projection 15,000 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.

Exhibit Error! No text of specified style in document.**-1. Alternative Concepts**

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



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 Alternatives 2 and 3

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

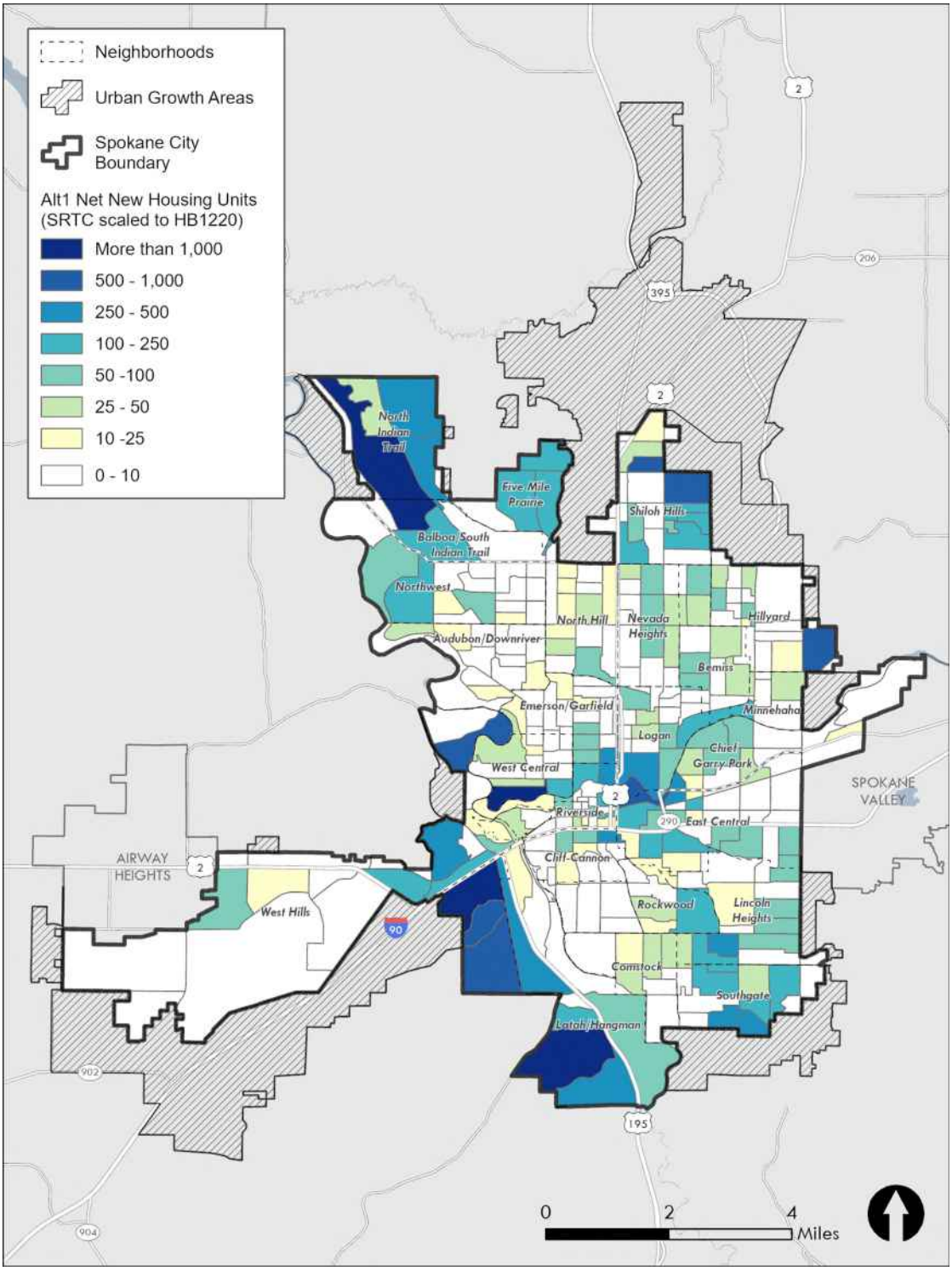
Growth Intensity Preferred Alternative

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

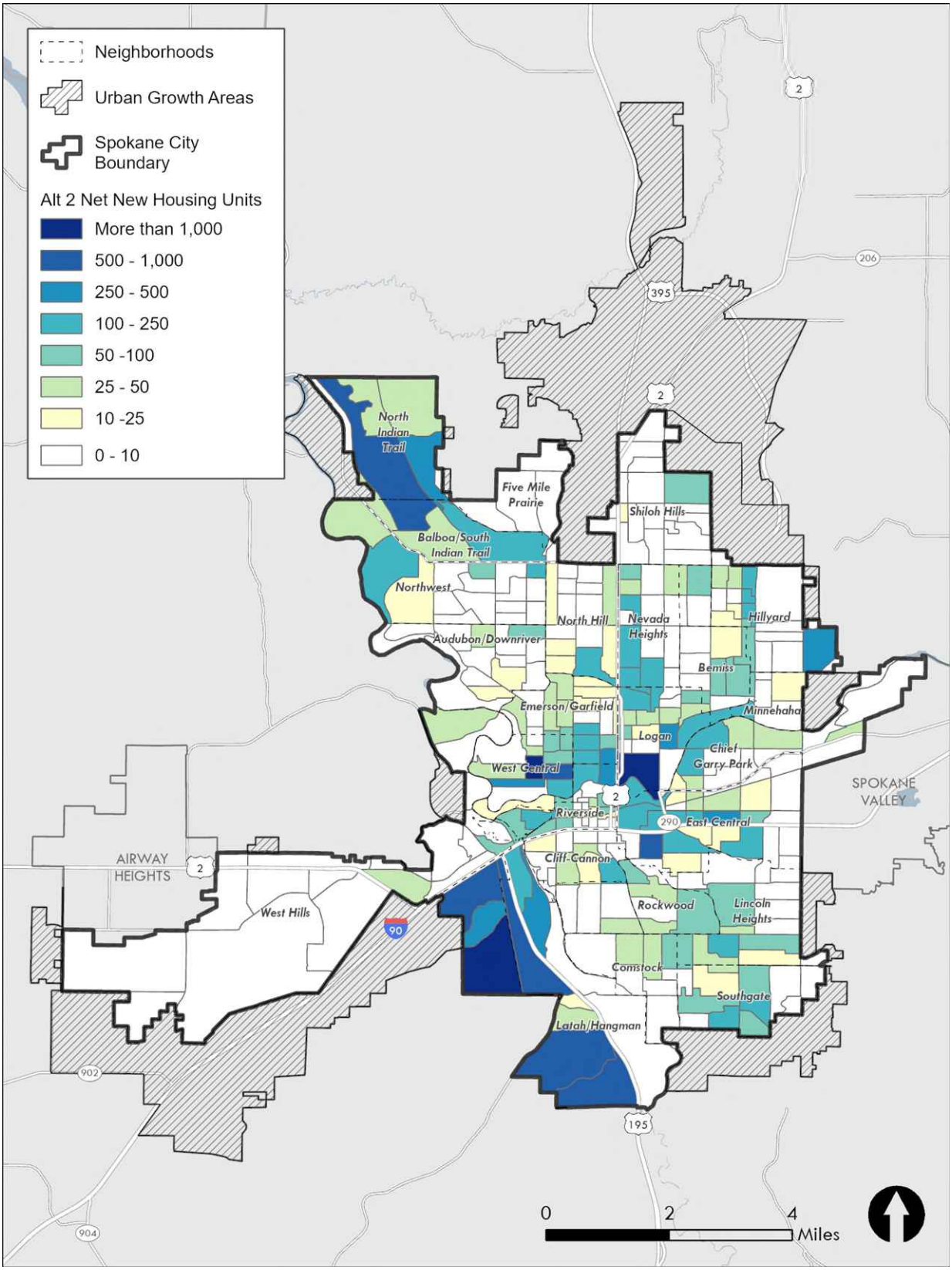
NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Source: City of Spokane, BERK, 2026.

Attachment B: NET Housing Growth Maps

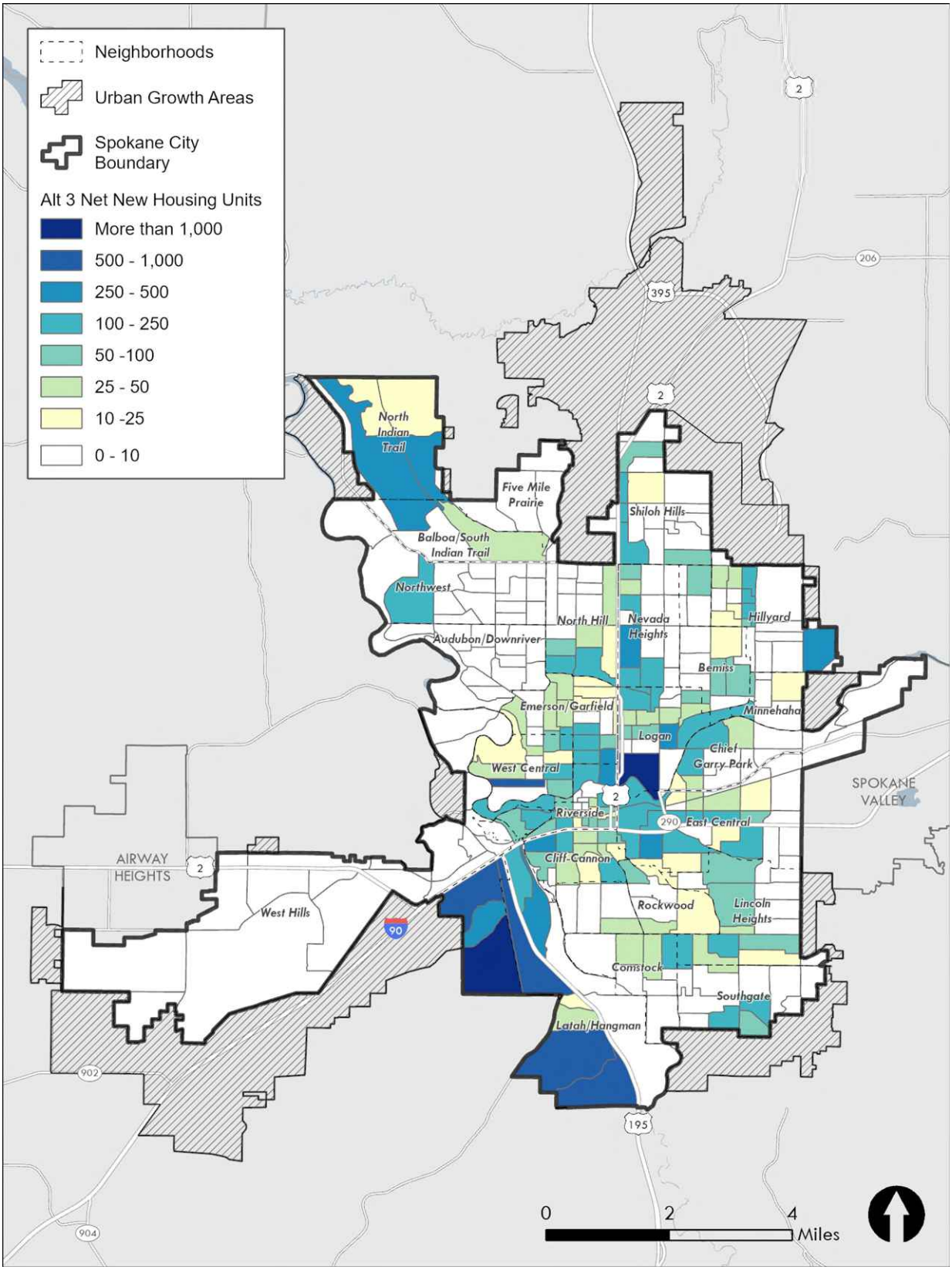
Alternative 1 – No Action Stay the Course: Housing



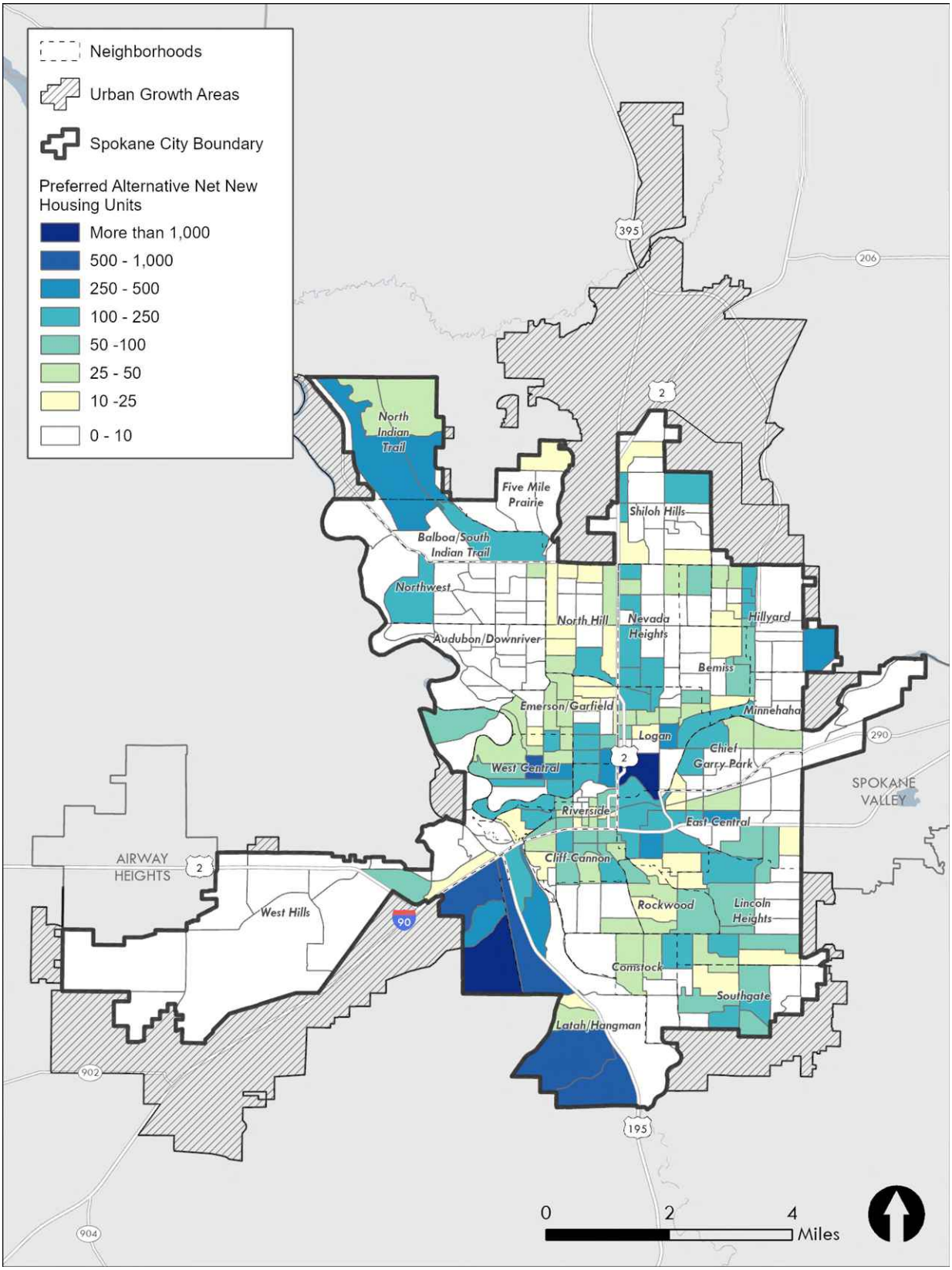
Alternative 2 – Distributed and Balanced: Housing



Alternative 3 – Center City and Regional Hubs: Housing



Preferred Alternative: Housing



Attachment C: NET Housing Growth Numbers by Alternative

TAZ_Part_ID	TAZ	LAD_NAME	Alt1 HU Allocation	Alt2 HU Allocation	Alt3 HU Allocation	Preferred Alternative HU Allocation
10	10	Spokane - West Central/CBD	103	228	81	133
20	20	Spokane - West Central/CBD	0	0	0	0
30	30	Spokane - West Central/CBD	286	299	337	339
40	40	Spokane - West Central/CBD	68	88	98	97
50	50	Spokane - West Central/CBD	0	0	0	0
60	60	Spokane - West Central/CBD	0	0	0	0
70	70	Spokane - West Central/CBD	2	42	47	46
80	80	Spokane - West Central/CBD	163	87	101	96
90	90	Spokane - West Central/CBD	0	26	29	29
100	100	Spokane - West Central/CBD	4	27	31	31
110	110	Spokane - West Central/CBD	0	0	0	0
120	120	Spokane - West Central/CBD	75	17	20	19
130	130	Spokane - West Central/CBD	6	69	80	76
140	140	Spokane - West Central/CBD	-9	91	101	100
150	150	Spokane - West Central/CBD	34	2	22	21
160	160	Spokane - West Central/CBD	22	4	52	49
170	170	Spokane - West Central/CBD	0	3	51	48
180	180	Spokane - West Central/CBD	174	14	15	15
190	190	Spokane - West Central/CBD	11	5	77	73
200	200	Spokane - West Central/CBD	191	146	154	163
210	210	Spokane - West Central/CBD	0	0	0	0
220	220	Spokane - West Central/CBD	4	0	0	0
260	260	Spokane - Northwest	43	26	24	28
270	270	Spokane - Northwest	258	26	24	28
282	282	Spokane - Northwest	0	47	0	1
290	290	Spokane - Northwest	1038	523	398	466
300	300	Spokane - Northwest	297	410	312	365
320	320	Spokane - Northwest	136	5	1	7
330	330	Spokane - Northwest	50	209	1	7
340	340	Spokane - Northwest	138	39	8	1
350	350	Spokane - Northwest	0	160	33	137
360	360	Spokane - Audubon/Downriver	26	0	0	0
370	370	Spokane - Audubon/Downriver	0	6	0	1
380	380	Spokane - Audubon/Downriver	0	51	0	1
390	390	Spokane - Audubon/Downriver	0	0	0	0
400	400	Spokane - Audubon/Downriver	0	125	0	31
410	410	Spokane - West Division	16	1	0	19
420	420	Spokane - West Division	7	1	0	19
430	430	Spokane - Audubon/Downriver	0	0	0	0

TAZ_Part_ID	TAZ	LAD_NAME	Alt1 HU Allocation	Alt2 HU Allocation	Alt3 HU Allocation	Preferred Alternative HU Allocation
440	440	Spokane - Audubon/Downriver	0	0	0	0
450	450	Spokane - Audubon/Downriver	9	0	0	0
460	460	Spokane - West Division	0	16	0	18
470	470	Spokane - West Division	18	0	0	0
480	480	Spokane - West Division	3	0	0	5
490	490	Spokane - West Division	22	38	40	42
500	500	Spokane - Audubon/Downriver	16	0	0	0
512	512	Spokane - Northwest	153	6	1	9
520	520	Spokane - Audubon/Downriver	53	4	0	1
530	530	Spokane - Audubon/Downriver	0	0	0	0
540	540	Spokane - Audubon/Downriver	0	2	0	0
550	550	Spokane - West Division	12	1	0	1
560	560	Spokane - West Division	39	1	0	2
570	570	Spokane - Audubon/Downriver	126	14	171	193
580	580	Spokane - Audubon/Downriver	2	5	0	2
590	590	Spokane - Audubon/Downriver	22	0	0	0
600	600	Spokane - Audubon/Downriver	24	8	0	1
610	610	Spokane - Audubon/Downriver	0	50	0	3
620	620	Spokane - Audubon/Downriver	0	0	0	0
630	630	Spokane - Audubon/Downriver	0	2	0	3
640	640	Spokane - West Division	14	10	0	11
650	650	Spokane - West Division	0	4	26	5
661	661	Spokane - Audubon/Downriver	7	0	0	0
662	662	Spokane - Audubon/Downriver	0	0	0	0
670	670	Spokane - Audubon/Downriver	0	8	0	1
680	680	Spokane - Audubon/Downriver	0	0	0	0
690	690	Spokane - West Division	30	12	73	13
700	700	Spokane - Audubon/Downriver	0	4	0	0
710	710	Spokane - Audubon/Downriver	0	23	0	2

TAZ_Part_ID	TAZ	LAD_NAME	Alt1 HU Allocation	Alt2 HU Allocation	Alt3 HU Allocation	Preferred Alternative HU Allocation
720	720	Spokane - Audubon/Downriver	18	1	0	2
730	730	Spokane - West Division	0	24	152	27
740	740	Spokane - West Division	77	205	216	227
750	750	Spokane - West Division	5	12	12	13
760	760	Spokane - Audubon/Downriver	25	23	0	2
770	770	Spokane - Audubon/Downriver	0	55	0	0
780	780	Spokane - Audubon/Downriver	0	8	0	9
790	790	Spokane - West Division	21	35	37	38
800	800	Spokane - West Division	1	11	12	12
810	810	Spokane - West Division	0	16	17	18
820	820	Spokane - Audubon/Downriver	17	45	47	49
830	830	Spokane - Audubon/Downriver	0	2	0	2
840	840	Spokane - West Division	0	38	37	41
850	850	Spokane - West Division	0	37	39	40
860	860	Spokane - West Division	16	15	16	16
871	871	Spokane - West Division	0	9	9	10
872	872	Spokane - West Division	8	22	23	24
880	880	Spokane - West Division	0	5	5	5
890	890	Spokane - Audubon/Downriver	0	1	10	17
900	900	Spokane - West Division	72	112	118	123
910	910	Spokane - West Central/CBD	3	65	69	72
920	920	Spokane - Audubon/Downriver	0	39	5	61
931	931	Spokane - Audubon/Downriver	751	3	0	5
932	932	Spokane - Audubon/Downriver	0	3	0	4
940	940	Spokane - West Central/CBD	27	2	24	40
950	950	Spokane - West Division	0	97	96	158
960	960	Spokane - West Division	0	76	107	45
970	970	Spokane - West Central/CBD	61	159	169	175
980	980	Spokane - West Central/CBD	0	33	33	54
990	990	Spokane - West Central/CBD	0	1101	1551	645
1000	1000	Spokane - West Central/CBD	0	543	193	318
1010	1010	Spokane - West Central/CBD	33	385	543	225
1020	1020	Spokane - West Central/CBD	1272	6	8	0
1030	1030	Spokane - West Central/CBD	21	13	169	190
1040	1040	Spokane - West Central/CBD	0	150	149	167
1051	1051	West Plains - Sunset Hill/Airport	330	3	0	4

TAZ_Part_ID	TAZ	LAD_NAME	Alt1 HU Allocation	Alt2 HU Allocation	Alt3 HU Allocation	Preferred Alternative HU Allocation
1052	1052	West Plains - Sunset Hill/Airport	18	4	0	6
1053	1053	West Plains - Sunset Hill/Airport	0	1	0	1
1060	1060	Spokane - West Central/CBD	28	91	90	11
1070	1070	Spokane - West Central/CBD	0	53	59	59
1080	1080	West Plains - Sunset Hill/Airport	84	79	1	10
1090	1090	West Plains - Sunset Hill/Airport	163	8	1	12
1100	1100	Spokane - Fairwood	38	5	63	12
1110	1110	Spokane - Fairwood	0	10	118	124
1120	1120	Spokane - Fairwood	550	62	0	148
1131	1131	Spokane - Fairwood	77	0	1	1
1132	1132	Spokane - Fairwood	-1	13	158	166
1141	1141	Spokane - Fairwood	153	7	1	10
1142	1142	Spokane - Fairwood	109	1	0	2
1150	1150	Spokane - Fairwood	0	5	52	11
1160	1160	Spokane - East Division	0	0	0	0
1170	1170	Spokane - East Division	58	10	0	9
1180	1180	Spokane - East Division	0	46	0	43
1190	1190	Spokane - East Division	60	64	64	72
1200	1200	Spokane - Hillyard	33	40	44	41
1220	1220	Spokane - East Division	76	7	0	6
1230	1230	Spokane - East Division	50	10	0	9
1240	1240	Spokane - East Division	36	6	6	6
1250	1250	Spokane - Hillyard	56	7	8	1
1300	1300	Spokane - East Division	6	245	258	228
1310	1310	Spokane - East Division	57	8	0	7
1320	1320	Spokane - East Division	33	9	0	8
1330	1330	Spokane - East Division	0	8	7	8
1340	1340	Spokane - Hillyard	36	17	17	19
1350	1350	Spokane - Hillyard	0	70	1	70
1370	1370	Spokane - East Division	0	142	150	156
1380	1380	Spokane - East Division	0	142	149	132
1390	1390	Spokane - East Division	0	9	10	9
1400	1400	Spokane - East Division	52	1	7	1
1410	1410	Spokane - East Division	57	5	1	7
1421	1421	Spokane - Hillyard	0	73	98	80
1422	1422	Spokane - East Division	0	0	0	0
1430	1430	Spokane - Hillyard	0	56	55	7
1440	1440	Spokane - Hillyard	25	89	88	99
1450	1450	Spokane - Hillyard	0	6	6	7
1471	1471	Spokane - East Division	47	31	31	35
1472	1472	Spokane - East Division	3	35	35	39
1480	1480	Spokane - East Division	0	27	27	30
1490	1490	Spokane - Hillyard	152	193	180	203
1500	1500	Spokane - Hillyard	8	6	6	7

TAZ_Part_ID	TAZ	LAD_NAME	Alt1 HU Allocation	Alt2 HU Allocation	Alt3 HU Allocation	Preferred Alternative HU Allocation
1511	1511	Spokane - East Division	43	11	66	13
1512	1512	Spokane - East Division	4	62	62	69
1520	1520	Spokane - East Division	54	363	363	363
1530	1530	Spokane - East Central/U-District	61	104	102	115
1540	1540	Spokane - East Central/U-District	64	28	28	32
1551	1551	Spokane - East Division	1	9	9	9
1552	1552	Spokane - East Division	10	1391	1391	1,391
1560	1560	Spokane - East Central/U-District	362	1192	1192	1,192
1570	1570	Spokane - East Central/U-District	76	0	0	0
1580	1580	Spokane - East Central/U-District	44	138	136	153
1590	1590	Spokane - East Central/U-District	50	7	7	8
1600	1600	Spokane - East Central/U-District	857	238	184	207
1610	1610	Spokane - East Central/U-District	221	233	217	244
1621	1621	Spokane - East Central/U-District	55	137	135	152
1622	1622	Spokane - East Central/U-District	269	15	15	17
1623	1623	Spokane - East Central/U-District	2	10	10	11
1631	1631	Spokane - East Central/U-District	13	36	35	1
1632	1632	Spokane - East Central/U-District	21	131	130	146
1633	1633	Spokane - East Central/U-District	245	38	38	42
1640	1640	Spokane - East Central/U-District	0	0	0	0
1650	1650	Spokane - East Central/U-District	31	0	0	0
1660	1660	Spokane - East Central/U-District	0	1	0	1
1670	1670	Spokane - East Central/U-District	0	0	0	0
1680	1680	Spokane - East Central/U-District	0	2	0	3
1701	1701	Spokane - East Central/U-District	0	0	0	0
1710	1710	Spokane - South Hill West	0	21	268	33
1720	1720	Spokane - South Hill West	88	9	118	202
1730	1730	Spokane - South Hill West	92	4	45	74
1740	1740	Spokane - South Hill West	408	5	60	98

TAZ_Part_ID	TAZ	LAD_NAME	Alt1 HU Allocation	Alt2 HU Allocation	Alt3 HU Allocation	Preferred Alternative HU Allocation
1750	1750	Spokane - South Hill West	12	38	37	61
1760	1760	Spokane - South Hill West	0	4	46	75
1770	1770	Spokane - US 195 Corridor/Eagle Ridge	20	140	119	140
1781	1781	Spokane - South Hill West	10	8	100	12
1782	1782	Spokane - South Hill West	0	0	0	0
1783	1783	Spokane - South Hill West	5	0	0	0
1790	1790	Spokane - South Hill West	17	32	31	54
1810	1810	Spokane - South Hill West	2	17	17	27
1820	1820	Spokane - South Hill West	0	133	140	210
1830	1830	Spokane - South Hill West	0	60	60	67
1841	1841	West Plains - Sunset Hill/Airport	1224	643	655	643
1842	1842	West Plains - Sunset Hill/Airport	549	376	383	376
1850	1850	West Plains - Sunset Hill/Airport	849	1027	1047	1,027
1861	1861	Spokane - US 195 Corridor/Eagle Ridge	326	682	694	682
1862	1862	Spokane - US 195 Corridor/Eagle Ridge	3	360	305	360
1870	1870	Spokane - South Hill West	0	0	0	0
1880	1880	Spokane - South Hill West	0	1	0	1
1890	1890	Spokane - South Hill West	0	2	2	3
1900	1900	Spokane - South Hill West	0	1	17	28
1910	1910	Spokane - East Central/U-District	0	33	0	37
1920	1920	Spokane - South Hill West	0	35	35	39
1930	1930	Spokane - South Hill West	0	0	0	1
1940	1940	Spokane - South Hill West	19	31	31	35
1950	1950	Spokane - South Hill West	29	2	0	29
1961	1961	Spokane - US 195 Corridor/Eagle Ridge	0	0	0	0
1962	1962	Spokane - South Hill West	0	0	0	0
1970	1970	Spokane - US 195 Corridor/Eagle Ridge	64	3	0	4
1981	1981	Spokane - US 195 Corridor/Eagle Ridge	1043	721	734	721
1982	1982	Spokane - US 195 Corridor/Eagle Ridge	8	15	15	15
1983	1983	Spokane - US 195 Corridor/Eagle Ridge	146	34	35	34
1985	1985	Spokane - US 195 Corridor/Eagle Ridge	364	532	543	532
1990	1990	Spokane - South Hill West	18	9	116	131
2000	2000	Spokane - South Hill East	131	868	323	363
2010	2010	Spokane - South Hill East	121	212	210	236
2020	2020	Spokane - South Hill East	0	23	8	10

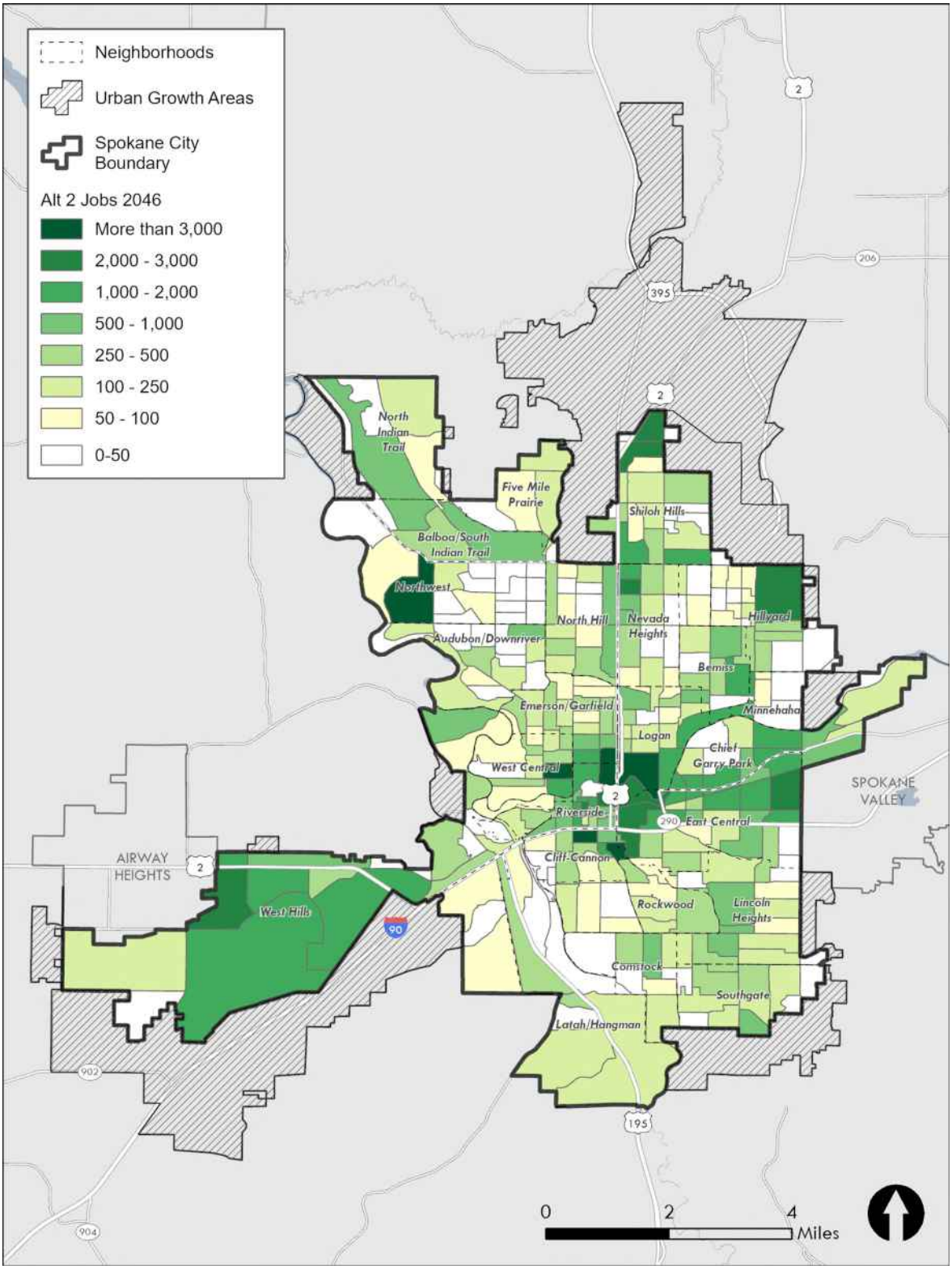
TAZ_Part_ID	TAZ	LAD_NAME	Alt1 HU Allocation	Alt2 HU Allocation	Alt3 HU Allocation	Preferred Alternative HU Allocation
2030	2030	Spokane - South Hill East	61	23	23	10
2040	2040	Spokane - South Hill East	94	177	177	75
2050	2050	Spokane - South Hill East	77	1	0	22
2060	2060	Spokane - South Hill East	19	1	13	17
2070	2070	Spokane - South Hill East	23	15	15	16
2080	2080	Spokane - South Hill East	6	1	8	14
2090	2090	Spokane - South Hill East	0	7	57	104
2100	2100	Spokane - South Hill East	8	5	1	93
2110	2110	Spokane - South Hill East	54	2	0	3
2120	2120	Spokane - South Hill East	0	30	9	34
2130	2130	Spokane - South Hill East	40	8	8	11
2140	2140	Spokane - South Hill East	22	32	32	36
2150	2150	Spokane - South Hill East	113	84	18	70
2160	2160	Spokane - South Hill East	18	77	81	86
2170	2170	Spokane - South Hill East	0	45	48	50
2180	2180	Spokane - South Hill East	0	3	0	5
2190	2190	Spokane - South Hill East	99	3	0	5
2200	2200	Spokane - South Hill East	64	2	0	4
2210	2210	Spokane - South Hill West	35	44	43	49
2220	2220	Spokane - South Hill West	43	96	101	108
2230	2230	Spokane - Moran Prairie	220	36	38	40
2240	2240	Spokane - Moran Prairie	266	103	108	113
2250	2250	Spokane - Moran Prairie	92	65	68	71
2260	2260	Spokane - Moran Prairie	0	13	14	15
2270	2270	Spokane - South Hill West	0	1	0	8
2280	2280	Spokane - South Hill West	0	0	0	0
2290	2290	Spokane - Moran Prairie	121	13	0	14
2300	2300	Spokane - Moran Prairie	28	79	0	89
2310	2310	Spokane - Moran Prairie	133	7	1	10
2340	2340	Spokane - Moran Prairie	0	64	0	71
2350	2350	Spokane - Moran Prairie	129	136	132	151
2370	2370	Spokane - Moran Prairie	415	172	167	191
2380	2380	Spokane - Fairwood	15	2	0	2
2390	2390	Spokane - Fairwood	636	0	4	5
2400	2400	Spokane - Fairwood	0	2	19	4
2410	2410	Spokane - Fairwood	0	0	0	0
2420	2420	Spokane - Fairwood	214	8	101	20
2430	2430	Spokane - Fairwood	1	1	0	3
2441	2441	Spokane - Fairwood	234	1	0	1
2442	2442	Spokane - Fairwood	78	0	0	0
2450	2450	Spokane - East Division	32	91	96	101
2460	2460	Spokane - East Division	0	32	34	30
2470	2470	Spokane - East Division	0	105	111	116
2480	2480	Spokane - East Division	89	136	134	151
2490	2490	Spokane - Hillyard	0	28	38	31
2500	2500	Spokane - Hillyard	0	1	0	13
2510	2510	Spokane - West Division	4	56	20	33
2520	2520	Spokane - West Central/CBD	76	148	144	163

TAZ_Part_ID	TAZ	LAD_NAME	Alt1 HU Allocation	Alt2 HU Allocation	Alt3 HU Allocation	Preferred Alternative HU Allocation
2541	2541	Spokane - East Central/U-District	0	36	36	40
2542	2542	Spokane - East Central/U-District	0	251	249	280
2551	2551	Spokane - East Central/U-District	0	14	14	2
2552	2552	Spokane - East Central/U-District	0	81	80	10
4602	4602	West Plains - Airway Heights/Fairchild	0	0	0	0
5101	5101	Spokane - Northwest	188	8	1	12
5180	5180	Spokane - Fairwood	0	0	0	0
5271	5271	Spokane - Hillyard	589	350	350	350
5471	5471	West Plains - Sunset Hill/Airport	0	0	0	0
5483	5483	West Plains - Sunset Hill/Airport	193	36	5	55
5501	5501	West Plains - Sunset Hill/Airport	56	0	0	0
5502	5502	West Plains - Sunset Hill/Airport	-2	0	0	0
5503	5503	West Plains - Sunset Hill/Airport	19	0	0	0
5511	5511	West Plains - Sunset Hill/Airport	0	0	0	0
5630	5630	Spokane - Moran Prairie	275	61	59	67
1210_1	1210	Spokane - Hillyard	29	133	147	134
1210_2	1210	Spokane - Hillyard	7	31	34	31
1260_1	1260	Spokane - Hillyard	0	8	9	8
1260_2	1260	Spokane - Hillyard	0	155	172	157
1270_1	1270	Spokane - Hillyard	66	152	169	154
1270_2	1270	Spokane - Hillyard	8	19	21	19
1280_1	1280	Spokane - Hillyard	6	21	23	21
1280_2	1280	Spokane - Hillyard	19	72	80	73
1290_1	1290	Spokane - Hillyard	0	4	4	4
1290_2	1290	Spokane - Hillyard	0	4	4	4
1290_3	1290	Spokane - Hillyard	0	4	4	4
1360_1	1360	Spokane - Hillyard	1	3	3	3
1360_2	1360	Spokane - Hillyard	1	2	2	2
1460_1	1460	Spokane - Hillyard	21	10	10	10
1460_2	1460	Spokane - Hillyard	35	11	11	1
1690_1	1690	Spokane - East Central/U-District	0	0	0	0
1690_2	1690	Spokane - East Central/U-District	23	49	0	1
2330_1	2330	Spokane - Moran Prairie	0	0	0	0
2330_2	2330	Spokane - Moran Prairie	103	0	0	0

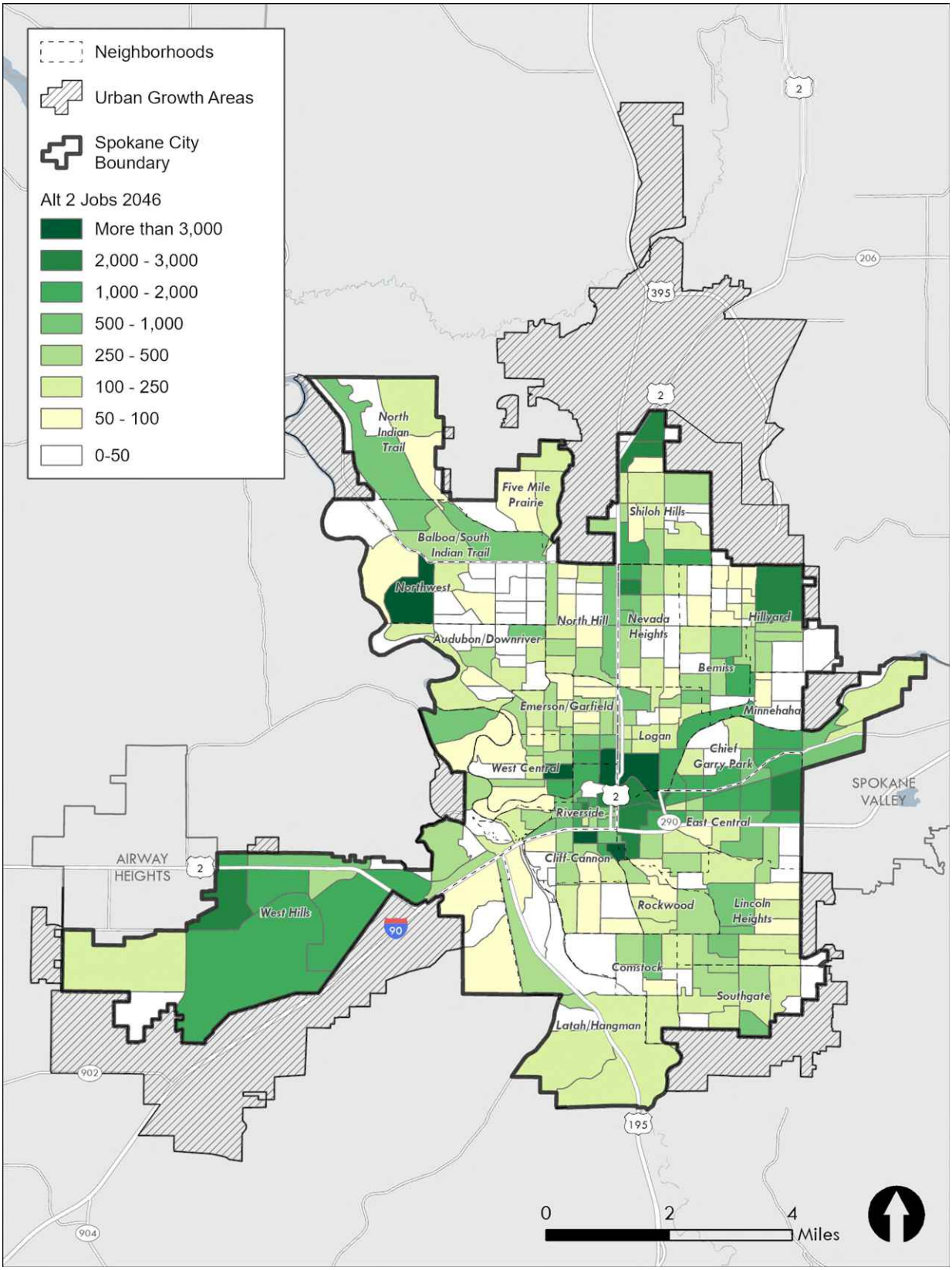
TAZ_Part_ID	TAZ	LAD_NAME	Alt1 HU Allocation	Alt2 HU Allocation	Alt3 HU Allocation	Preferred Alternative HU Allocation
5520_1	5520	West Plains - Sunset Hill/Airport	0	0	0	0
5520_2	5520	West Plains - Sunset Hill/Airport	0	0	0	0
5520_3	5520	West Plains - Sunset Hill/Airport	0	0	0	0
Total (NET)			21,738	21,738	21,738	PrefAlt HU Allocation

Attachment D: TOTAL Employment Growth Maps

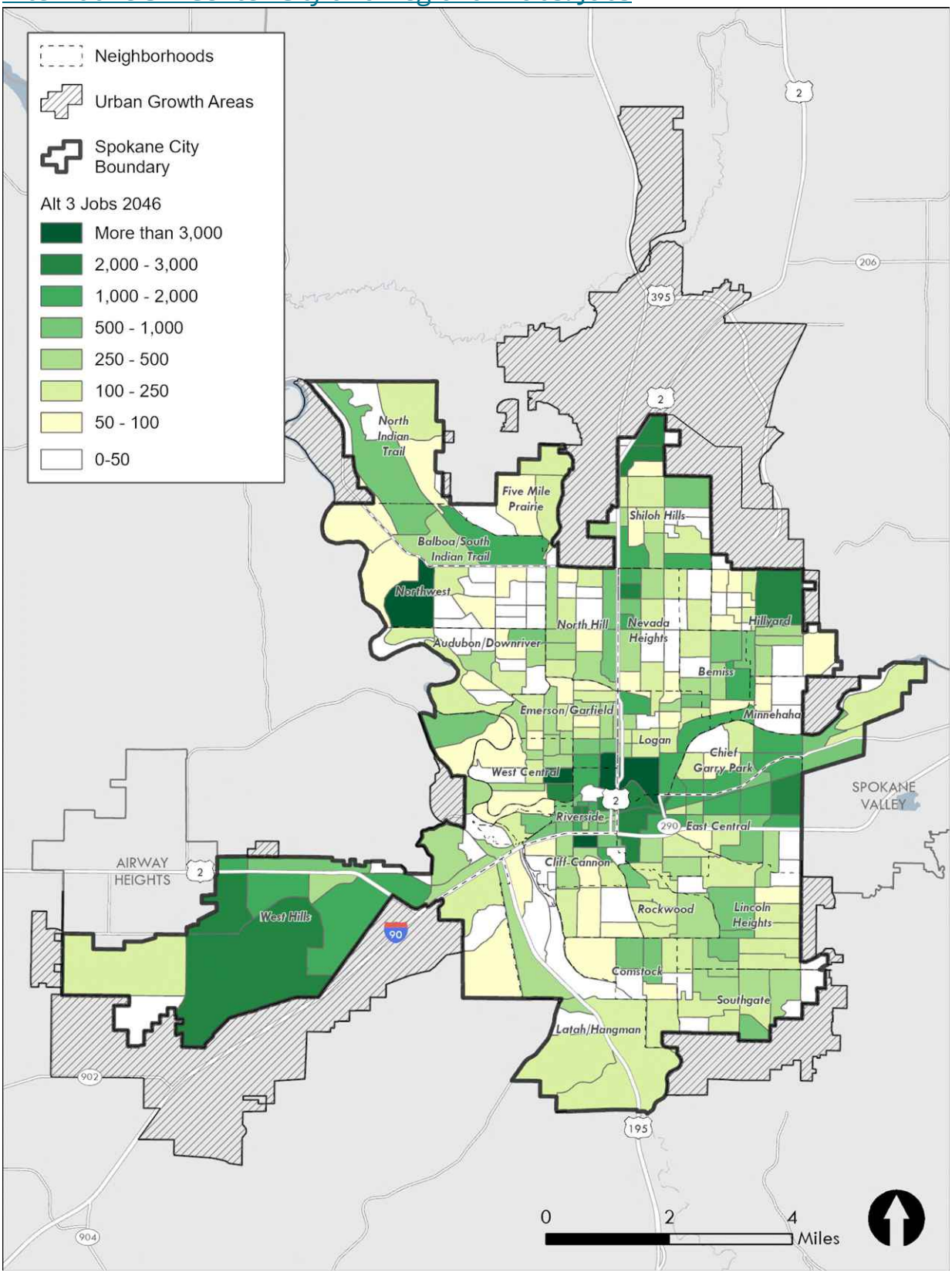
Alternative 1 – No Action Stay the Course: Jobs



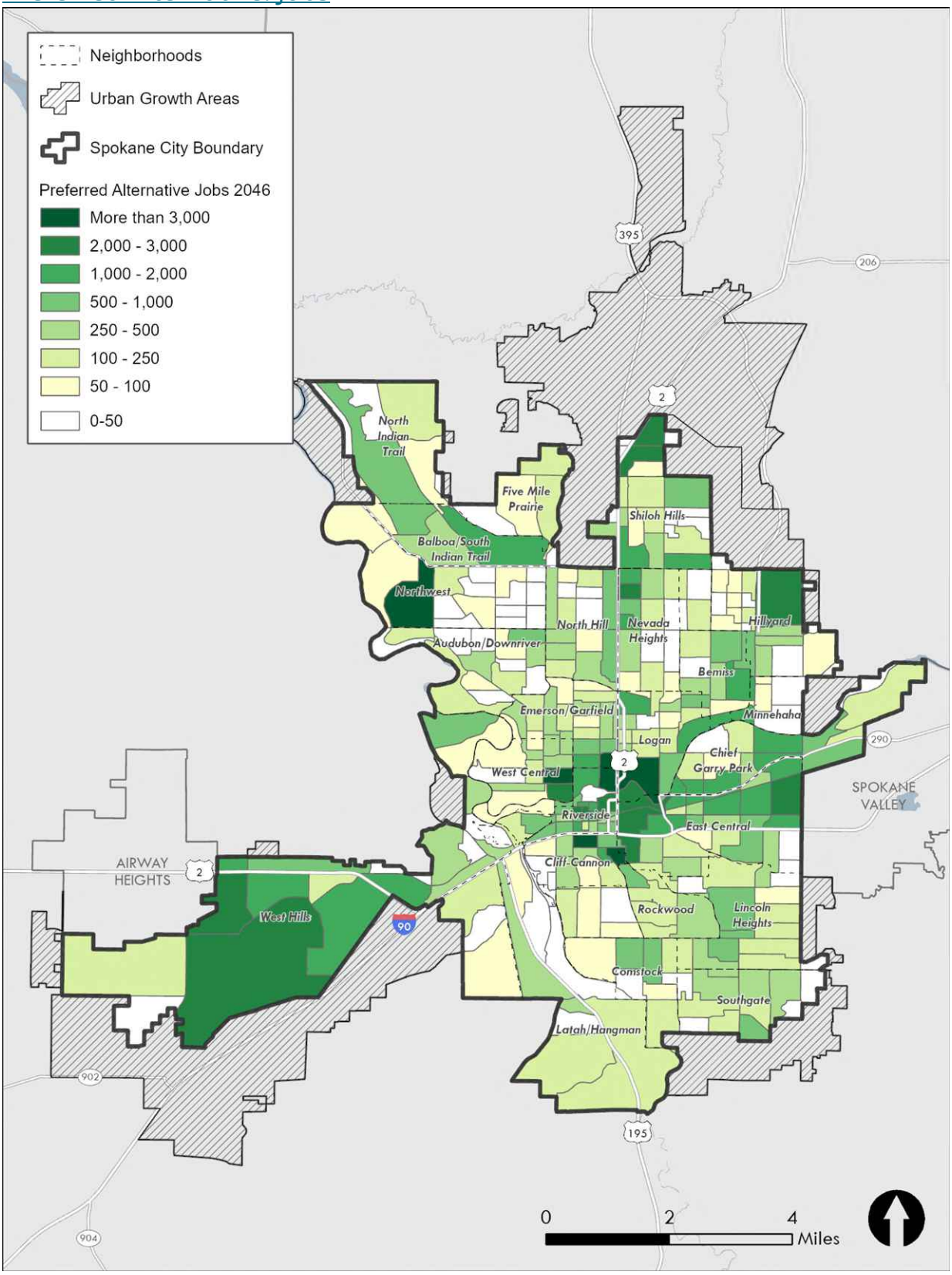
Alternative 2 – Distributed and Balanced: Jobs



Alternative 3 – Center City and Regional Hubs: Jobs



Preferred Alternative: Jobs



Attachment E: TOTAL Employment Growth Numbers by Alternative

TAZ_Part_ID	TAZ	LAD_NAME	Jobs: Alt 1 2046 & Preferred 2046	Alt 2 Jobs 2046	Alt 3 Jobs 2046
10	10	Spokane - West Central/CBD	2021	1841	2021
20	20	Spokane - West Central/CBD	44	40	44
30	30	Spokane - West Central/CBD	4814	4385	4815
40	40	Spokane - West Central/CBD	697	635	697
50	50	Spokane - West Central/CBD	2194	1999	2195
60	60	Spokane - West Central/CBD	2642	2407	2643
70	70	Spokane - West Central/CBD	1183	1078	1183
80	80	Spokane - West Central/CBD	2290	2086	2416
90	90	Spokane - West Central/CBD	443	403	443
100	100	Spokane - West Central/CBD	558	508	558
110	110	Spokane - West Central/CBD	1087	990	1147
120	120	Spokane - West Central/CBD	1081	985	1141
130	130	Spokane - West Central/CBD	754	687	796
140	140	Spokane - West Central/CBD	598	545	598
150	150	Spokane - West Central/CBD	1419	1293	1497
160	160	Spokane - West Central/CBD	239	218	252
170	170	Spokane - West Central/CBD	480	437	507
180	180	Spokane - West Central/CBD	408	372	408
190	190	Spokane - West Central/CBD	856	780	904
200	200	Spokane - West Central/CBD	1775	1617	1775
210	210	Spokane - West Central/CBD	801	730	801
220	220	Spokane - West Central/CBD	1972	1797	1973
260	260	Spokane - Northwest	39	35	39
270	270	Spokane - Northwest	146	133	146
282	282	Spokane - Northwest	53	48	53
290	290	Spokane - Northwest	986	899	987
300	300	Spokane - Northwest	86	78	86
320	320	Spokane - Northwest	60	54	60
330	330	Spokane - Northwest	82	75	82
340	340	Spokane - Northwest	387	353	387
350	350	Spokane - Northwest	1062	968	1062
360	360	Spokane - Audubon/Downriver	127	116	127
370	370	Spokane - Audubon/Downriver	146	133	146
380	380	Spokane - Audubon/Downriver	8	7	8
390	390	Spokane - Audubon/Downriver	50	46	50
400	400	Spokane - Audubon/Downriver	26	24	26
410	410	Spokane - West Division	68	62	68
420	420	Spokane - West Division	115	104	115
430	430	Spokane - Audubon/Downriver	13	12	13
440	440	Spokane - Audubon/Downriver	12	11	12
450	450	Spokane - Audubon/Downriver	6	5	6
460	460	Spokane - West Division	355	324	355
470	470	Spokane - West Division	4	3	4
480	480	Spokane - West Division	45	41	45
490	490	Spokane - West Division	591	538	591
500	500	Spokane - Audubon/Downriver	20	18	20
512	512	Spokane - Northwest	157	143	157

TAZ_Part_ID	TAZ	LAD_NAME	Jobs: Alt 1 2046 & Preferred 2046	Alt 2 Jobs 2046	Alt 3 Jobs 2046
520	520	Spokane - Audubon/Downriver	97	88	97
530	530	Spokane - Audubon/Downriver	4	4	4
540	540	Spokane - Audubon/Downriver	44	40	44
550	550	Spokane - West Division	108	98	108
560	560	Spokane - West Division	21	19	21
570	570	Spokane - Audubon/Downriver	3610	3289	3810
580	580	Spokane - Audubon/Downriver	4	3	4
590	590	Spokane - Audubon/Downriver	3	3	3
600	600	Spokane - Audubon/Downriver	19	17	19
610	610	Spokane - Audubon/Downriver	22	20	22
620	620	Spokane - Audubon/Downriver	54	49	54
630	630	Spokane - Audubon/Downriver	268	244	268
640	640	Spokane - West Division	262	238	262
650	650	Spokane - West Division	87	79	87
661	661	Spokane - Audubon/Downriver	191	174	191
662	662	Spokane - Audubon/Downriver	33	30	33
670	670	Spokane - Audubon/Downriver	279	254	279
680	680	Spokane - Audubon/Downriver	28	26	28
690	690	Spokane - West Division	342	311	342
700	700	Spokane - Audubon/Downriver	91	83	91
710	710	Spokane - Audubon/Downriver	205	187	205
720	720	Spokane - Audubon/Downriver	41	37	41
730	730	Spokane - West Division	248	226	248
740	740	Spokane - West Division	292	266	292
750	750	Spokane - West Division	702	640	702
760	760	Spokane - Audubon/Downriver	45	41	45
770	770	Spokane - Audubon/Downriver	915	833	915
780	780	Spokane - Audubon/Downriver	179	163	179
790	790	Spokane - West Division	68	62	68
800	800	Spokane - West Division	56	51	56
810	810	Spokane - West Division	107	97	107
820	820	Spokane - Audubon/Downriver	276	251	276
830	830	Spokane - Audubon/Downriver	151	138	151
840	840	Spokane - West Division	382	348	382
850	850	Spokane - West Division	163	148	163
860	860	Spokane - West Division	299	272	299
871	871	Spokane - West Division	325	296	325
872	872	Spokane - West Division	276	251	276
880	880	Spokane - West Division	94	85	94
890	890	Spokane - Audubon/Downriver	73	66	73
900	900	Spokane - West Division	216	197	216
910	910	Spokane - West Central/CBD	710	647	710
920	920	Spokane - Audubon/Downriver	839	764	839
931	931	Spokane - Audubon/Downriver	60	55	60
932	932	Spokane - Audubon/Downriver	308	280	308
940	940	Spokane - West Central/CBD	97	88	97
950	950	Spokane - West Division	251	228	251
960	960	Spokane - West Division	420	382	420
970	970	Spokane - West Central/CBD	556	506	556

TAZ_Part_ID	TAZ	LAD_NAME	Jobs: Alt 1 2046 & Preferred 2046	Alt 2 Jobs 2046	Alt 3 Jobs 2046
980	980	Spokane - West Central/CBD	39	36	39
990	990	Spokane - West Central/CBD	181	165	181
1000	1000	Spokane - West Central/CBD	3393	3091	3394
1010	1010	Spokane - West Central/CBD	401	365	401
1020	1020	Spokane - West Central/CBD	71	65	71
1030	1030	Spokane - West Central/CBD	65	59	65
1040	1040	Spokane - West Central/CBD	520	474	520
1051	1051	West Plains - Sunset Hill/Airport	308	281	308
1052	1052	West Plains - Sunset Hill/Airport	32	29	32
1053	1053	West Plains - Sunset Hill/Airport	5	5	5
1060	1060	Spokane - West Central/CBD	142	129	142
1070	1070	Spokane - West Central/CBD	708	645	708
1080	1080	West Plains - Sunset Hill/Airport	264	241	264
1090	1090	West Plains - Sunset Hill/Airport	314	286	314
1100	1100	Spokane - Fairwood	2472	2252	2472
1110	1110	Spokane - Fairwood	187	170	187
1120	1120	Spokane - Fairwood	525	478	554
1131	1131	Spokane - Fairwood	62	56	62
1132	1132	Spokane - Fairwood	424	387	425
1141	1141	Spokane - Fairwood	17	15	17
1142	1142	Spokane - Fairwood	15	13	15
1150	1150	Spokane - Fairwood	1917	1746	1917
1160	1160	Spokane - East Division	1073	978	1073
1170	1170	Spokane - East Division	473	431	473
1180	1180	Spokane - East Division	144	131	144
1190	1190	Spokane - East Division	37	34	37
1200	1200	Spokane - Hillyard	56	51	56
1220	1220	Spokane - East Division	191	174	191
1230	1230	Spokane - East Division	40	37	40
1240	1240	Spokane - East Division	100	91	100
1250	1250	Spokane - Hillyard	5	5	5
1300	1300	Spokane - East Division	293	267	293
1310	1310	Spokane - East Division	39	36	39
1320	1320	Spokane - East Division	40	36	40
1330	1330	Spokane - East Division	219	200	219
1340	1340	Spokane - Hillyard	735	669	735
1350	1350	Spokane - Hillyard	544	496	544
1370	1370	Spokane - East Division	83	76	83
1380	1380	Spokane - East Division	204	186	204
1390	1390	Spokane - East Division	99	90	99
1400	1400	Spokane - East Division	15	14	15
1410	1410	Spokane - East Division	356	324	356
1421	1421	Spokane - Hillyard	929	847	929
1422	1422	Spokane - East Division	350	319	350
1430	1430	Spokane - Hillyard	318	289	318
1440	1440	Spokane - Hillyard	1309	1193	1309
1450	1450	Spokane - Hillyard	89	82	90
1471	1471	Spokane - East Division	11	10	11
1472	1472	Spokane - East Division	399	363	399

TAZ_Part_ID	TAZ	LAD_NAME	Jobs: Alt 1 2046 & Preferred 2046	Alt 2 Jobs 2046	Alt 3 Jobs 2046
1480	1480	Spokane - East Division	99	90	99
1490	1490	Spokane - Hillyard	1423	1297	1502
1500	1500	Spokane - Hillyard	9	8	9
1511	1511	Spokane - East Division	133	121	140
1512	1512	Spokane - East Division	173	158	173
1520	1520	Spokane - East Division	141	129	149
1530	1530	Spokane - East Central/U-District	32	29	32
1540	1540	Spokane - East Central/U-District	146	133	146
1551	1551	Spokane - East Division	114	120	120
1552	1552	Spokane - East Division	324	295	324
1560	1560	Spokane - East Central/U-District	3401	3589	3589
1570	1570	Spokane - East Central/U-District	949	1002	1002
1580	1580	Spokane - East Central/U-District	236	215	236
1590	1590	Spokane - East Central/U-District	54	49	54
1600	1600	Spokane - East Central/U-District	2368	2498	2498
1610	1610	Spokane - East Central/U-District	2610	2378	2754
1621	1621	Spokane - East Central/U-District	1594	1452	1682
1622	1622	Spokane - East Central/U-District	1643	1734	1734
1623	1623	Spokane - East Central/U-District	167	152	176
1631	1631	Spokane - East Central/U-District	1148	1211	1211
1632	1632	Spokane - East Central/U-District	626	570	626
1633	1633	Spokane - East Central/U-District	413	376	413
1640	1640	Spokane - East Central/U-District	1062	1121	1121
1650	1650	Spokane - East Central/U-District	475	502	502
1660	1660	Spokane - East Central/U-District	2473	2253	2473
1670	1670	Spokane - East Central/U-District	1007	1063	1063
1680	1680	Spokane - East Central/U-District	1108	1010	1108
1701	1701	Spokane - East Central/U-District	197	208	208
1710	1710	Spokane - South Hill West	82	75	82
1720	1720	Spokane - South Hill West	367	335	368
1730	1730	Spokane - South Hill West	3942	3591	4160
1740	1740	Spokane - South Hill West	729	664	769
1750	1750	Spokane - South Hill West	437	398	461
1760	1760	Spokane - South Hill West	1335	1217	1409
1770	1770	Spokane - US 195 Corridor/Eagle Ridge	74	67	74
1781	1781	Spokane - South Hill West	48	44	48
1782	1782	Spokane - South Hill West	12	11	12
1783	1783	Spokane - South Hill West	7	6	7
1790	1790	Spokane - South Hill West	298	271	298
1810	1810	Spokane - South Hill West	73	67	73
1820	1820	Spokane - South Hill West	135	123	135
1830	1830	Spokane - South Hill West	527	480	527
1841	1841	West Plains - Sunset Hill/Airport	101	92	101
1842	1842	West Plains - Sunset Hill/Airport	18	17	18
1850	1850	West Plains - Sunset Hill/Airport	56	51	56
1861	1861	Spokane - US 195 Corridor/Eagle Ridge	449	409	449
1862	1862	Spokane - US 195 Corridor/Eagle Ridge	46	42	46
1870	1870	Spokane - South Hill West	162	148	162
1880	1880	Spokane - South Hill West	65	59	65

TAZ_Part_ID	TAZ	LAD_NAME	Jobs: Alt 1 2046 & Preferred 2046	Alt 2 Jobs 2046	Alt 3 Jobs 2046
1890	1890	Spokane - South Hill West	47	43	47
1900	1900	Spokane - South Hill West	7855	7156	8290
1910	1910	Spokane - East Central/U-District	1293	1365	1365
1920	1920	Spokane - South Hill West	84	77	84
1930	1930	Spokane - South Hill West	51	46	51
1940	1940	Spokane - South Hill West	542	494	542
1950	1950	Spokane - South Hill West	50	45	50
1961	1961	Spokane - US 195 Corridor/Eagle Ridge	0	0	0
1962	1962	Spokane - South Hill West	0	0	0
1970	1970	Spokane - US 195 Corridor/Eagle Ridge	248	226	248
1981	1981	Spokane - US 195 Corridor/Eagle Ridge	160	146	160
1982	1982	Spokane - US 195 Corridor/Eagle Ridge	324	295	324
1983	1983	Spokane - US 195 Corridor/Eagle Ridge	39	36	39
1985	1985	Spokane - US 195 Corridor/Eagle Ridge	169	154	169
1990	1990	Spokane - South Hill West	2337	2129	2467
2000	2000	Spokane - South Hill East	344	313	363
2010	2010	Spokane - South Hill East	201	183	212
2020	2020	Spokane - South Hill East	91	83	91
2030	2030	Spokane - South Hill East	155	141	155
2040	2040	Spokane - South Hill East	604	550	604
2050	2050	Spokane - South Hill East	30	28	30
2060	2060	Spokane - South Hill East	103	94	103
2070	2070	Spokane - South Hill East	340	310	340
2080	2080	Spokane - South Hill East	13	12	13
2090	2090	Spokane - South Hill East	163	148	163
2100	2100	Spokane - South Hill East	318	290	318
2110	2110	Spokane - South Hill East	44	40	44
2120	2120	Spokane - South Hill East	103	94	103
2130	2130	Spokane - South Hill East	136	124	137
2140	2140	Spokane - South Hill East	145	132	145
2150	2150	Spokane - South Hill East	421	383	421
2160	2160	Spokane - South Hill East	687	626	687
2170	2170	Spokane - South Hill East	624	568	624
2180	2180	Spokane - South Hill East	94	86	94
2190	2190	Spokane - South Hill East	222	202	222
2200	2200	Spokane - South Hill East	108	98	108
2210	2210	Spokane - South Hill West	560	510	560
2220	2220	Spokane - South Hill West	167	152	167
2230	2230	Spokane - Moran Prairie	495	451	495
2240	2240	Spokane - Moran Prairie	921	839	921
2250	2250	Spokane - Moran Prairie	133	121	133
2260	2260	Spokane - Moran Prairie	115	105	115
2270	2270	Spokane - South Hill West	59	53	59
2280	2280	Spokane - South Hill West	39	35	39
2290	2290	Spokane - Moran Prairie	482	439	482
2300	2300	Spokane - Moran Prairie	399	364	400
2310	2310	Spokane - Moran Prairie	263	240	263
2340	2340	Spokane - Moran Prairie	230	209	230
2350	2350	Spokane - Moran Prairie	167	152	176

TAZ_Part_ID	TAZ	LAD_NAME	Jobs: Alt 1 2046 & Preferred 2046	Alt 2 Jobs 2046	Alt 3 Jobs 2046
2370	2370	Spokane - Moran Prairie	236	215	249
2380	2380	Spokane - Fairwood	2238	2039	2239
2390	2390	Spokane - Fairwood	91	83	91
2400	2400	Spokane - Fairwood	216	197	216
2410	2410	Spokane - Fairwood	178	162	178
2420	2420	Spokane - Fairwood	1492	1359	1492
2430	2430	Spokane - Fairwood	461	420	461
2441	2441	Spokane - Fairwood	118	108	118
2442	2442	Spokane - Fairwood	5	5	5
2450	2450	Spokane - East Division	1738	1583	1738
2460	2460	Spokane - East Division	2521	2297	2522
2470	2470	Spokane - East Division	707	644	707
2480	2480	Spokane - East Division	1042	949	1042
2490	2490	Spokane - Hillyard	133	121	133
2500	2500	Spokane - Hillyard	53	48	53
2510	2510	Spokane - West Division	421	384	421
2520	2520	Spokane - West Central/CBD	1391	1267	1391
2541	2541	Spokane - East Central/U-District	1286	1171	1286
2542	2542	Spokane - East Central/U-District	261	237	261
2551	2551	Spokane - East Central/U-District	1149	1047	1149
2552	2552	Spokane - East Central/U-District	557	508	557
4602	4602	West Plains - Airway Heights/Fairchild	214	195	226
5101	5101	Spokane - Northwest	135	123	135
5180	5180	Spokane - Fairwood	403	367	403
5271	5271	Spokane - Hillyard	54	49	54
5471	5471	West Plains - Sunset Hill/Airport	973	887	973
5483	5483	West Plains - Sunset Hill/Airport	1154	1051	1154
5501	5501	West Plains - Sunset Hill/Airport	2077	2192	2192
5502	5502	West Plains - Sunset Hill/Airport	1828	1929	1929
5503	5503	West Plains - Sunset Hill/Airport	1591	1679	1679
5511	5511	West Plains - Sunset Hill/Airport	2099	1912	2215
5630	5630	Spokane - Moran Prairie	942	858	994
1210_1	1210	Spokane - Hillyard	109	99	146
1210_2	1210	Spokane - Hillyard	97	88	60
1260_1	1260	Spokane - Hillyard	60	28	28
1260_2	1260	Spokane - Hillyard	44	67	77
1270_1	1270	Spokane - Hillyard	140	158	179
1270_2	1270	Spokane - Hillyard	99	60	60
1280_1	1280	Spokane - Hillyard	81	74	81
1280_2	1280	Spokane - Hillyard	15	14	15
1290_1	1290	Spokane - Hillyard	2225	2348	2348
1290_2	1290	Spokane - Hillyard	391	413	413
1290_3	1290	Spokane - Hillyard	399	421	421
1360_1	1360	Spokane - Hillyard	299	316	316
1360_2	1360	Spokane - Hillyard	72	76	76
1460_1	1460	Spokane - Hillyard	14	13	14
1460_2	1460	Spokane - Hillyard	14	12	14
1690_1	1690	Spokane - East Central/U-District	599	632	632
1690_2	1690	Spokane - East Central/U-District	124	131	131

TAZ_Part_ID	TAZ	LAD_NAME	Jobs: Alt 1 2046 & Preferred 2046	Alt 2 Jobs 2046	Alt 3 Jobs 2046
2330_1	2330	Spokane - Moran Prairie	136	118	121
2330_2	2330	Spokane - Moran Prairie	24	21	21
5520_1	5520	West Plains - Sunset Hill/Airport	219	272	272
5520_2	5520	West Plains - Sunset Hill/Airport	1146	1425	1425
5520_3	5520	West Plains - Sunset Hill/Airport	596	372	372
Total			157,065	146,720	160,629

C Transportation

NOTE: *Draft EIS appendix included project implementation table shared below in C-1. Final EIS adds Section C-2 with Synchro intersection reports for all alternatives.*

C-1. 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

ID	Project	Scope / Description (one line)	Lead / Implemented By	Status	Funding Pathway
29	Central Access Rd w/ Roundabouts	New N–S connection Hawthorne → Farwell (east of Costco)	Spokane County	Developer-delivered	Developer mitigation
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

ID	Project	Scope / Description (one line)	Lead / Implemented By	Status	Funding Pathway
58	US 2 / Spotted Roundabout	Roundabout at US 2 & Spotted	City of Spokane	Planned	Impact fees, City match, developer, grants

C-2. Synchro Reports

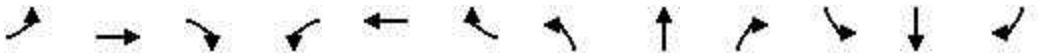
Table of Contents

Study intersection # and name (DEIS)	PDF page # of 93			
	Alt 1 page 2	**Alt 2 page 25**	**Alt 3 page 48**	**Existing (2024) page 71**
10 – US 2 / N Division St & Wellesley Ave	3	26	49	72
18 – N Ash St & W Wellesley Ave	4	27	50	73
21 – SR 291 / W Francis Ave & N Alberta St	5	28	51	74
16 – N Market St & E Euclid Ave	6	29	52	75
14 – N Maple St & W Boone Ave	7	30	53	76
6 – SR 290 / E Trent Ave & N Hamilton St	8	31	54	77
15 – E Mission Ave & N Hamilton St	9	32	55	78
9 – US 2 / N Division St & W Buckeye Ave / E North Foothills Dr	10	33	56	79
2 – S Southeast Blvd & E 29th Ave	11	34	57	80
3 – S Grand Blvd & E 29th Ave	12	35	58	81
5 – N Napa St & E Sprague Ave	13	36	59	82
13 – W 3rd Ave & S Monroe St	14	37	60	83
4 – N Havana St & E Sprague Ave	15	38	61	84
20 – N Market St & E Francis Ave	16	39	62	85
12 – US 2 / N Newport Hwy & E Holland Ave	17	40	63	86
22 – US 2 / W Sunset Hwy & Flint Rd	18	41	64	87
1 – S Hatch Rd & E 57th Ave	19	42	65	88
19 – E Wellesley Ave & N Haven St	20	43	66	89
11 – US 2 / N Division St & W Francis Ave	21	44	67	90
17 – N T J Meenach Dr & W Northwest Blvd	22	45	68	91
7 – US 2 / S Division St & E Sprague Ave	23	46	69	92
8 – US 2 / N Ruby St & E Indiana Ave	24	47	70	93

Alternative 1 Synchro Reports

HCM 7th Signalized Intersection Summary
2: Division St & Wellesley Ave

11/05/2025



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	340	620	150	200	650	130	370	1160	200	100	1160	140
Future Volume (veh/h)	340	620	150	200	650	130	370	1160	200	100	1160	140
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.04	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.97	1.00		0.96	1.00		0.98	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1800	1744	1758	1800	1772	1843	1800	1786	1772	1772	1772	1786
Adj Flow Rate, veh/h	366	667	161	215	699	140	398	1247	215	108	1247	151
Peak Hour Factor	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93
Percent Heavy Veh, %	0	4	3	0	2	2	0	1	2	2	2	1
Cap, veh/h	314	717	173	234	761	340	301	2014	610	128	1366	165
Arrive On Green	0.18	0.27	0.26	0.14	0.23	0.23	0.18	0.41	0.41	0.08	0.31	0.31
Sat Flow, veh/h	1714	2627	634	1714	3367	1502	1714	4876	1478	1688	4360	528
Grp Volume(v), veh/h	366	420	408	215	699	140	398	1247	215	108	922	476
Grp Sat Flow(s),veh/h/ln	1714	1657	1604	1714	1683	1502	1714	1625	1478	1688	1612	1663
Q Serve(g_s), s	30.2	40.8	40.9	20.4	33.5	13.1	29.0	33.3	16.5	10.4	45.4	45.4
Cycle Q Clear(g_c), s	30.2	40.8	40.9	20.4	33.5	13.1	29.0	33.3	16.5	10.4	45.4	45.4
Prop In Lane	1.00		0.39	1.00		1.00	1.00		1.00	1.00		0.32
Lane Grp Cap(c), veh/h	314	452	438	234	761	340	301	2014	610	128	1010	521
V/C Ratio(X)	1.17	0.93	0.93	0.92	0.92	0.41	1.32	0.62	0.35	0.84	0.91	0.91
Avail Cap(c_a), veh/h	314	452	438	303	775	346	301	2014	610	215	1010	521
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	67.4	58.5	58.8	70.3	62.3	54.5	68.0	38.2	33.3	75.3	54.5	54.7
Incr Delay (d2), s/veh	103.9	25.7	26.6	27.6	15.5	0.6	165.8	1.4	1.6	13.9	13.8	22.9
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	22.3	20.4	19.9	10.8	16.0	5.1	26.6	13.7	6.3	5.0	20.4	22.4
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	171.3	84.2	85.4	97.9	77.9	55.1	233.8	39.6	34.9	89.2	68.3	77.6
LnGrp LOS	F	F	F	F	E	E	F	D	C	F	E	E
Approach Vol, veh/h		1194			1054			1860			1506	
Approach Delay, s/veh		111.3			78.9			80.6			72.7	
Approach LOS		F			E			F			E	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	16.5	72.2	35.0	41.3	33.0	55.7	27.3	49.0
Change Period (Y+Rc), s	4.0	5.0	4.4	5.4	4.0	5.0	4.4	5.4
Max Green Setting (Gmax), s	21.0	58.0	30.6	36.6	29.0	50.0	29.6	37.6
Max Q Clear Time (g_c+I1), s	12.4	35.3	32.2	35.5	31.0	47.4	22.4	42.9
Green Ext Time (p_c), s	0.2	8.2	0.0	0.5	0.0	1.7	0.5	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	84.7
HCM 7th LOS	F



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	780	110	180	910	0	0	0	0	80	820	100
Future Volume (veh/h)	0	780	110	180	910	0	0	0	0	80	820	100
Initial Q (Qb), veh	0	0	0	0	0	0				0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00				1.04	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00				1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Work Zone On Approach		No			No						No	
Adj Sat Flow, veh/h/ln	0	1786	1772	1786	1786	0				1843	1843	1843
Adj Flow Rate, veh/h	0	804	113	212	1071	0				85	872	106
Peak Hour Factor	0.97	0.97	0.97	0.85	0.85	0.85				0.94	0.94	0.94
Percent Heavy Veh, %	0	1	2	1	1	0				2	2	2
Cap, veh/h	0	930	131	238	1497	0				136	1392	169
Arrive On Green	0.00	0.31	0.31	0.09	0.44	0.00				0.47	0.47	0.46
Sat Flow, veh/h	0	3077	420	1701	3483	0				288	2957	359
Grp Volume(v), veh/h	0	457	460	212	1071	0				539	0	524
Grp Sat Flow(s),veh/h/ln	0	1697	1710	1701	1697	0				1828	0	1776
Q Serve(g_s), s	0.0	25.4	25.4	6.9	25.8	0.0				22.1	0.0	22.2
Cycle Q Clear(g_c), s	0.0	25.4	25.4	6.9	25.8	0.0				22.1	0.0	22.2
Prop In Lane	0.00		0.25	1.00		0.00				0.16		0.20
Lane Grp Cap(c), veh/h	0	528	532	238	1497	0				861	0	836
V/C Ratio(X)	0.00	0.86	0.87	0.89	0.72	0.00				0.63	0.00	0.63
Avail Cap(c_a), veh/h	0	655	660	238	1751	0				861	0	836
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Upstream Filter(I)	0.00	0.89	0.89	0.71	0.71	0.00				1.00	0.00	1.00
Uniform Delay (d), s/veh	0.0	32.5	32.5	43.3	22.8	0.0				19.9	0.0	19.9
Incr Delay (d2), s/veh	0.0	8.9	8.8	24.6	0.8	0.0				3.4	0.0	3.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0				0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	11.5	11.6	6.4	10.1	0.0				9.9	0.0	9.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	0.0	41.4	41.4	67.9	23.6	0.0				23.3	0.0	23.4
LnGrp LOS		D	D	E	C					C		C
Approach Vol, veh/h		917			1283						1063	
Approach Delay, s/veh		41.4			31.0						23.4	
Approach LOS		D			C						C	

Timer - Assigned Phs				4		6	7	8				
Phs Duration (G+Y+Rc), s				48.5		51.5	13.0	35.5				
Change Period (Y+Rc), s				5.0		5.0	5.0	5.0				
Max Green Setting (Gmax), s				51.0		39.0	8.0	38.0				
Max Q Clear Time (g_c+I1), s				27.8		24.2	8.9	27.4				
Green Ext Time (p_c), s				5.8		4.4	0.0	3.1				

Intersection Summary												
HCM 7th Control Delay, s/veh			31.4									
HCM 7th LOS			C									



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	40	1080	130	180	1490	40	440	90	150	50	60	40
Future Volume (veh/h)	40	1080	130	180	1490	40	440	90	150	50	60	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.04	1.04	1.00	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.99	1.00		0.96
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1800	1772	1786	1744	1800	1800	1800	1872	1828	1800	1872	1872
Adj Flow Rate, veh/h	44	1200	144	207	1713	46	354	240	156	79	95	63
Peak Hour Factor	0.90	0.90	0.90	0.87	0.87	0.87	0.96	0.96	0.96	0.63	0.63	0.63
Percent Heavy Veh, %	0	2	1	4	0	0	0	0	3	0	0	0
Cap, veh/h	155	1404	168	249	1689	45	393	242	157	135	81	54
Arrive On Green	0.05	0.46	0.45	0.09	0.50	0.49	0.23	0.23	0.21	0.08	0.08	0.06
Sat Flow, veh/h	1714	3028	362	1661	3403	91	1714	1054	685	1714	1032	684
Grp Volume(v), veh/h	44	666	678	207	858	901	354	0	396	79	0	158
Grp Sat Flow(s),veh/h/ln	1714	1683	1707	1661	1710	1784	1714	0	1739	1714	0	1716
Q Serve(g_s), s	1.5	39.6	40.0	7.1	56.1	56.1	22.7	0.0	25.7	5.0	0.0	8.9
Cycle Q Clear(g_c), s	1.5	39.6	40.0	7.1	56.1	56.1	22.7	0.0	25.7	5.0	0.0	8.9
Prop In Lane	1.00		0.21	1.00		0.05	1.00		0.39	1.00		0.40
Lane Grp Cap(c), veh/h	155	781	792	249	849	885	393	0	399	135	0	135
V/C Ratio(X)	0.28	0.85	0.86	0.83	1.01	1.02	0.90	0.00	0.99	0.59	0.00	1.17
Avail Cap(c_a), veh/h	261	781	792	397	849	885	393	0	399	135	0	135
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	25.7	26.9	27.1	24.0	28.4	28.5	42.3	0.0	43.8	50.3	0.0	52.4
Incr Delay (d2), s/veh	0.4	9.3	9.5	4.0	33.7	34.6	22.6	0.0	43.2	7.7	0.0	129.9
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.6	17.1	17.6	2.8	29.3	30.8	12.0	0.0	15.8	2.4	0.0	8.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	26.1	36.2	36.6	28.1	62.1	63.1	64.9	0.0	87.0	58.0	0.0	182.3
LnGrp LOS	C	D	D	C	F	F	E		F	E		F
Approach Vol, veh/h		1388			1966			750			237	
Approach Delay, s/veh		36.1			59.0			76.6			140.9	
Approach LOS		D			E			E			F	

Timer - Assigned Phs	2	3	4	6	7	8
Phs Duration (G+Y+Rc), s	30.0	10.0	61.0	12.0	14.0	57.0
Change Period (Y+Rc), s	6.0	4.0	6.0	5.0	4.0	6.0
Max Green Setting (Gmax), s	24.0	13.0	55.0	7.0	20.0	48.0
Max Q Clear Time (g_c+I1), s	27.7	3.5	58.1	10.9	9.1	42.0
Green Ext Time (p_c), s	0.0	0.0	0.0	0.0	0.3	4.1

Intersection Summary	
HCM 7th Control Delay, s/veh	59.2
HCM 7th LOS	E

Notes

User approved pedestrian interval to be less than phase max green.
User approved volume balancing among the lanes for turning movement.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	230	570	160	100	440	360	70	1010	90	240	710	40
Future Volume (veh/h)	230	570	160	100	440	360	70	1010	90	240	710	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.04	1.04	1.00	1.04	1.04	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		0.99	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1744	1857	1814	1786	1843	1843	1786	1758	1786	1758	1730	1786
Adj Flow Rate, veh/h	256	633	178	109	478	391	72	1041	93	247	732	41
Peak Hour Factor	0.90	0.90	0.90	0.92	0.92	0.92	0.97	0.97	0.97	0.97	0.97	0.97
Percent Heavy Veh, %	4	1	4	1	2	2	1	3	1	3	5	1
Cap, veh/h	278	824	231	215	427	349	311	1192	106	262	1429	80
Arrive On Green	0.13	0.30	0.30	0.06	0.23	0.23	0.03	0.38	0.38	0.10	0.45	0.44
Sat Flow, veh/h	1661	2706	760	1701	1819	1486	1701	3100	277	1674	3164	177
Grp Volume(v), veh/h	256	412	399	109	460	409	72	561	573	247	380	393
Grp Sat Flow(s),veh/h/ln	1661	1765	1701	1701	1751	1554	1701	1670	1707	1674	1643	1697
Q Serve(g_s), s	12.3	22.5	22.6	5.3	24.9	24.9	2.8	33.0	33.0	9.5	17.5	17.5
Cycle Q Clear(g_c), s	12.3	22.5	22.6	5.3	24.9	24.9	2.8	33.0	33.0	9.5	17.5	17.5
Prop In Lane	1.00		0.45	1.00		0.96	1.00		0.16	1.00		0.10
Lane Grp Cap(c), veh/h	278	538	518	215	411	365	311	642	656	262	742	767
V/C Ratio(X)	0.92	0.77	0.77	0.51	1.12	1.12	0.23	0.87	0.87	0.94	0.51	0.51
Avail Cap(c_a), veh/h	365	538	518	343	411	365	481	783	800	316	742	767
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	28.4	33.5	33.7	31.1	40.6	41.0	20.6	30.2	30.3	24.1	20.7	20.8
Incr Delay (d2), s/veh	21.1	6.0	6.3	0.7	80.8	84.0	0.1	9.4	9.3	31.2	0.6	0.6
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	6.4	10.4	10.1	2.2	19.8	17.9	1.1	14.3	14.7	5.8	6.6	6.8
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	49.4	39.4	39.9	31.8	121.4	125.0	20.7	39.6	39.6	55.3	21.4	21.4
LnGrp LOS	D	D	D	C	F	F	C	D	D	E	C	C
Approach Vol, veh/h		1067			978			1206			1020	
Approach Delay, s/veh		42.0			112.9			38.5			29.6	
Approach LOS		D			F			D			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.6	45.1	17.4	29.0	7.4	52.2	10.0	36.4
Change Period (Y+Rc), s	3.0	5.2	3.0	4.9	3.0	5.2	3.0	4.9
Max Green Setting (Gmax), s	11.6	48.8	20.0	24.1	15.0	45.8	15.0	22.1
Max Q Clear Time (g_c+I1), s	11.5	35.0	14.3	26.9	4.8	19.5	7.3	24.6
Green Ext Time (p_c), s	0.1	4.8	0.1	0.0	0.0	3.6	0.0	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	54.3
HCM 7th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	70	170	0	0	300	170	170	2320	150	0	0	0
Future Volume (veh/h)	70	170	0	0	300	170	170	2320	150	0	0	0
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0			
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		0.98	1.00		1.00			
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Work Zone On Approach		No			No			No				
Adj Sat Flow, veh/h/ln	1744	1702	0	0	1786	1772	1786	1772	1702			
Adj Flow Rate, veh/h	71	173	0	0	353	200	181	2468	160			
Peak Hour Factor	0.98	0.98	0.98	0.85	0.85	0.85	0.94	0.94	0.94			
Percent Heavy Veh, %	4	7	0	0	1	2	1	2	7			
Cap, veh/h	156	466	0	0	342	282	222	3015	193			
Arrive On Green	0.06	0.27	0.00	0.00	0.19	0.19	0.67	0.67	0.67			
Sat Flow, veh/h	1661	1702	0	0	1786	1474	329	4473	286			
Grp Volume(v), veh/h	71	173	0	0	353	200	966	880	963			
Grp Sat Flow(s),veh/h/ln	1661	1702	0	0	1786	1474	1755	1612	1719			
Q Serve(g_s), s	0.3	9.5	0.0	0.0	22.0	14.6	45.9	45.1	47.8			
Cycle Q Clear(g_c), s	0.3	9.5	0.0	0.0	22.0	14.6	45.9	45.1	47.8			
Prop In Lane	1.00		0.00	0.00		1.00	0.19		0.17			
Lane Grp Cap(c), veh/h	156	466	0	0	342	282	1183	1087	1159			
V/C Ratio(X)	0.45	0.37	0.00	0.00	1.03	0.71	0.82	0.81	0.83			
Avail Cap(c_a), veh/h	178	488	0	0	342	282	1183	1087	1159			
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Upstream Filter(I)	0.69	0.69	0.00	0.00	0.69	0.69	1.00	1.00	1.00			
Uniform Delay (d), s/veh	51.2	33.8	0.0	0.0	46.5	43.5	13.6	13.5	14.0			
Incr Delay (d2), s/veh	2.0	0.5	0.0	0.0	49.3	6.1	6.3	6.5	7.0			
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
%ile BackOfQ(50%),veh/ln	2.0	4.0	0.0	0.0	14.4	5.8	18.2	16.5	18.8			
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	53.2	34.2	0.0	0.0	95.8	49.6	19.9	20.0	20.9			
LnGrp LOS	D	C			F	D	B	B	C			
Approach Vol, veh/h		244			553			2809				
Approach Delay, s/veh		39.8			79.1			20.3				
Approach LOS		D			E			C				

Timer - Assigned Phs	2	3	4			8
Phs Duration (G+Y+Rc), s	80.5	9.5	25.0			34.5
Change Period (Y+Rc), s	5.0	5.0	5.0			5.0
Max Green Setting (Gmax), s	74.0	6.0	20.0			31.0
Max Q Clear Time (g_c+I1), s	49.8	2.3	24.0			11.5
Green Ext Time (p_c), s	10.9	0.1	0.0			0.9

Intersection Summary	
HCM 7th Control Delay, s/veh	30.6
HCM 7th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	100	140	390	270	150	190	140	1170	300	90	1550	50
Future Volume (veh/h)	100	140	390	270	150	190	140	1170	300	90	1550	50
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		0.99	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1786	1772	1786	1772	1772	1786	1786	1744	1730	1786	1786	1772
Adj Flow Rate, veh/h	125	175	488	321	179	226	146	1219	312	95	1632	53
Peak Hour Factor	0.80	0.80	0.80	0.84	0.84	0.84	0.96	0.96	0.96	0.95	0.95	0.95
Percent Heavy Veh, %	1	2	1	2	2	1	1	4	5	1	1	2
Cap, veh/h	145	499	451	244	329	394	136	1593	705	114	1560	51
Arrive On Green	0.09	0.21	0.21	0.14	0.27	0.27	0.08	0.48	0.48	0.07	0.47	0.46
Sat Flow, veh/h	1701	2374	1498	1688	1221	1462	1701	3313	1466	1701	3354	109
Grp Volume(v), veh/h	125	175	488	321	174	231	146	1219	312	95	823	862
Grp Sat Flow(s),veh/h/ln	1701	1187	1498	1688	1187	1495	1701	1657	1466	1701	1697	1766
Q Serve(g_s), s	10.9	9.5	31.6	21.8	18.8	20.2	12.0	45.5	21.1	8.3	70.0	70.0
Cycle Q Clear(g_c), s	10.9	9.5	31.6	21.8	18.8	20.2	12.0	45.5	21.1	8.3	70.0	70.0
Prop In Lane	1.00		1.00	1.00		0.98	1.00		1.00	1.00		0.06
Lane Grp Cap(c), veh/h	145	499	451	244	320	403	136	1593	705	114	789	822
V/C Ratio(X)	0.86	0.35	1.08	1.31	0.54	0.57	1.08	0.77	0.44	0.83	1.04	1.05
Avail Cap(c_a), veh/h	145	499	451	244	320	403	136	1593	705	124	789	822
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	68.0	50.7	52.7	64.4	47.0	47.7	69.2	32.1	25.8	69.3	40.3	40.3
Incr Delay (d2), s/veh	37.7	0.4	65.9	167.0	1.9	2.0	99.2	2.2	0.3	33.6	43.8	45.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	6.3	2.9	25.3	20.7	5.8	7.8	9.0	18.6	7.5	4.7	38.3	40.2
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	105.7	51.1	118.6	231.3	48.9	49.7	168.5	34.3	26.1	103.0	84.0	85.3
LnGrp LOS	F	D	F	F	D	D	F	C	C	F	F	F
Approach Vol, veh/h		788			726			1677			1780	
Approach Delay, s/veh		101.6			129.8			44.4			85.7	
Approach LOS		F			F			D			F	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.1	75.4	17.4	43.6	16.0	73.5	26.4	34.6
Change Period (Y+Rc), s	4.0	5.5	4.6	4.6	4.0	* 5.5	4.6	4.6
Max Green Setting (Gmax), s	10.0	68.5	12.8	39.0	12.0	* 68	21.8	30.0
Max Q Clear Time (g_c+I1), s	10.3	47.5	12.9	22.2	14.0	72.0	23.8	33.6
Green Ext Time (p_c), s	0.0	6.7	0.0	1.6	0.0	0.0	0.0	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	80.7
HCM 7th LOS	F

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	120	770	140	140	590	150	100	1230	80	110	990	40
Future Volume (veh/h)	120	770	140	140	590	150	100	1230	80	110	990	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.97	1.00		0.97	1.00		0.99	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1744	1758	1772	1786	1772	1786	1786	1758	1702	1758	1772	1646
Adj Flow Rate, veh/h	150	875	159	144	608	155	104	1281	83	117	1053	43
Peak Hour Factor	0.88	0.88	0.88	0.97	0.97	0.97	0.96	0.96	0.96	0.94	0.94	0.94
Percent Heavy Veh, %	4	3	2	1	2	1	1	3	7	3	2	11
Cap, veh/h	265	773	140	228	724	184	327	1493	97	255	1547	63
Arrive On Green	0.10	0.28	0.26	0.10	0.27	0.26	0.09	0.47	0.45	0.09	0.47	0.45
Sat Flow, veh/h	1661	2809	510	1701	2641	672	1701	3183	206	1674	3294	134
Grp Volume(v), veh/h	150	520	514	144	387	376	104	671	693	117	538	558
Grp Sat Flow(s),veh/h/ln	1661	1670	1649	1701	1683	1629	1701	1670	1719	1674	1683	1745
Q Serve(g_s), s	7.4	33.0	33.0	7.0	26.0	26.2	3.4	42.8	43.1	4.0	29.9	29.9
Cycle Q Clear(g_c), s	7.4	33.0	33.0	7.0	26.0	26.2	3.4	42.8	43.1	4.0	29.9	29.9
Prop In Lane	1.00		0.31	1.00		0.41	1.00		0.12	1.00		0.08
Lane Grp Cap(c), veh/h	265	459	454	228	461	446	327	783	806	255	791	820
V/C Ratio(X)	0.57	1.13	1.13	0.63	0.84	0.84	0.32	0.86	0.86	0.46	0.68	0.68
Avail Cap(c_a), veh/h	265	459	454	230	463	448	344	783	806	271	791	820
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.39	0.39	0.39	0.52	0.52	0.52	0.62	0.62	0.62
Uniform Delay (d), s/veh	29.4	43.5	43.8	30.3	41.1	41.5	17.1	28.3	28.5	23.3	24.8	24.9
Incr Delay (d2), s/veh	2.8	83.6	83.9	2.1	5.5	5.8	0.3	6.5	6.5	0.8	1.5	1.4
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.2	24.1	23.9	3.0	11.4	11.2	1.3	18.0	18.7	1.6	12.0	12.5
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	32.2	127.1	127.7	32.4	46.5	47.3	17.4	34.8	34.9	24.1	26.3	26.3
LnGrp LOS	C	F	F	C	D	D	B	C	C	C	C	C
Approach Vol, veh/h		1184			907			1468			1213	
Approach Delay, s/veh		115.3			44.6			33.6			26.1	
Approach LOS		F			D			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	12.8	58.3	14.0	34.9	12.8	58.4	13.9	35.0
Change Period (Y+Rc), s	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0
Max Green Setting (Gmax), s	9.8	52.0	9.0	30.0	9.0	52.0	9.0	30.0
Max Q Clear Time (g_c+I1), s	16.0	45.1	9.4	28.2	5.4	31.9	9.0	35.0
Green Ext Time (p_c), s	0.1	3.7	0.0	0.7	0.1	5.0	0.0	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	54.1
HCM 7th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	540	80	260	400	0	0	0	0	110	1390	110
Future Volume (veh/h)	0	540	80	260	400	0	0	0	0	110	1390	110
Initial Q (Qb), veh	0	0	0	0	0	0				0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00				1.04	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		1.00				1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Work Zone On Approach		No			No						No	
Adj Sat Flow, veh/h/ln	0	1772	1786	1786	1772	0				1857	1843	1843
Adj Flow Rate, veh/h	0	545	81	263	404	0				111	1404	111
Peak Hour Factor	0.99	0.99	0.99	0.99	0.99	0.99				0.99	0.99	0.99
Percent Heavy Veh, %	0	2	1	1	2	0				1	2	2
Cap, veh/h	0	735	109	326	1375	0				183	2313	752
Arrive On Green	0.00	0.25	0.26	0.11	0.41	0.00				0.48	0.48	0.49
Sat Flow, veh/h	0	3024	435	1701	3455	0				379	4798	1539
Grp Volume(v), veh/h	0	312	314	263	404	0				534	981	111
Grp Sat Flow(s),veh/h/ln	0	1683	1687	1701	1683	0				1824	1677	1539
Q Serve(g_s), s	0.0	16.2	16.3	10.4	7.7	0.0				20.4	20.3	3.8
Cycle Q Clear(g_c), s	0.0	16.2	16.3	10.4	7.7	0.0				20.4	20.3	3.8
Prop In Lane	0.00		0.26	1.00		0.00				0.21		1.00
Lane Grp Cap(c), veh/h	0	422	423	326	1375	0				879	1617	752
V/C Ratio(X)	0.00	0.74	0.74	0.81	0.29	0.00				0.61	0.61	0.15
Avail Cap(c_a), veh/h	0	422	423	326	1375	0				879	1617	752
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Upstream Filter(I)	0.00	1.00	1.00	0.29	0.29	0.00				1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	32.7	32.7	24.6	18.9	0.0				18.0	18.0	13.4
Incr Delay (d2), s/veh	0.0	11.1	11.3	4.4	0.2	0.0				3.1	1.7	0.4
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0				0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	7.8	7.8	4.6	3.0	0.0				8.8	7.8	1.4
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	0.0	43.8	44.0	29.0	19.0	0.0				21.1	19.7	13.8
LnGrp LOS		D	D	C	B					C	B	B
Approach Vol, veh/h		626			667						1626	
Approach Delay, s/veh		43.9			23.0						19.8	
Approach LOS		D			C						B	

Timer - Assigned Phs	2	3	4			8
Phs Duration (G+Y+Rc), s	51.0	15.0	29.0			44.0
Change Period (Y+Rc), s	4.6	4.0	4.6			4.6
Max Green Setting (Gmax), s	46.4	11.0	24.4			39.4
Max Q Clear Time (g_c+I1), s	22.4	12.4	18.3			9.7
Green Ext Time (p_c), s	0.5	0.0	0.1			0.2

Intersection Summary	
HCM 7th Control Delay, s/veh	25.7
HCM 7th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	200	820	260	60	600	100	220	340	40	160	480	170
Future Volume (veh/h)	200	820	260	60	600	100	220	340	40	160	480	170
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	0.99		0.96	1.00		0.97	1.00		0.99	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1772	1786	1772	1744	1800	1800	1772	1786	1716	1800	1786	1786
Adj Flow Rate, veh/h	215	882	280	64	638	106	227	351	41	172	516	183
Peak Hour Factor	0.93	0.93	0.93	0.94	0.94	0.94	0.97	0.97	0.97	0.93	0.93	0.93
Percent Heavy Veh, %	2	1	2	4	0	0	2	1	6	0	1	1
Cap, veh/h	320	873	277	181	897	149	309	850	99	432	626	221
Arrive On Green	0.10	0.35	0.34	0.06	0.31	0.30	0.11	0.32	0.32	0.09	0.30	0.29
Sat Flow, veh/h	1688	2506	793	1661	2919	484	1688	2621	304	1714	2100	742
Grp Volume(v), veh/h	215	596	566	64	373	371	227	159	233	172	293	406
Grp Sat Flow(s),veh/h/ln	1688	1697	1602	1661	1710	1693	1688	1197	1728	1714	1197	1645
Q Serve(g_s), s	7.6	31.0	31.0	2.3	17.2	17.3	8.3	9.2	9.4	6.3	20.3	20.5
Cycle Q Clear(g_c), s	7.6	31.0	31.0	2.3	17.2	17.3	8.3	9.2	9.4	6.3	20.3	20.5
Prop In Lane	1.00		0.50	1.00		0.29	1.00		0.18	1.00		0.45
Lane Grp Cap(c), veh/h	320	591	558	181	525	520	309	388	561	432	357	491
V/C Ratio(X)	0.67	1.01	1.01	0.35	0.71	0.71	0.73	0.41	0.41	0.40	0.82	0.83
Avail Cap(c_a), veh/h	452	591	558	380	596	590	612	417	602	784	417	573
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	20.5	29.0	29.1	23.3	27.3	27.4	21.9	23.4	23.5	20.1	29.0	29.2
Incr Delay (d2), s/veh	2.5	39.2	41.3	1.2	3.9	4.0	3.4	1.0	0.7	0.6	11.9	9.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.1	18.4	17.8	0.9	7.4	7.4	3.4	2.6	3.8	2.5	6.8	9.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	23.0	68.2	70.4	24.5	31.2	31.5	25.3	24.4	24.2	20.7	40.9	38.5
LnGrp LOS	C	F	F	C	C	C	C	C	C	C	D	D
Approach Vol, veh/h		1377			808			619			871	
Approach Delay, s/veh		62.0			30.8			24.6			35.8	
Approach LOS		E			C			C			D	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	11.7	32.9	13.0	31.3	14.1	30.5	9.4	35.0
Change Period (Y+Rc), s	3.0	4.6	3.0	4.6	3.0	4.6	3.0	4.6
Max Green Setting (Gmax), s	27.0	30.4	17.0	30.4	27.0	30.4	17.0	30.4
Max Q Clear Time (g_c+I1), s	8.3	11.4	9.6	19.3	10.3	22.5	4.3	33.0
Green Ext Time (p_c), s	0.6	2.2	0.5	3.6	0.8	2.8	0.1	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	42.7
HCM 7th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	60	610	150	230	490	260	170	260	150	410	530	40
Future Volume (veh/h)	60	610	150	230	490	260	170	260	150	410	530	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		0.98	0.99		0.98	0.99		0.99
Parking Bus, Adj	1.00	1.00	0.99	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1772	1786	1800	1772	1800	1786	1772	1786	1716	1800	1800	1800
Adj Flow Rate, veh/h	63	642	158	242	516	274	191	292	169	432	558	42
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.89	0.89	0.89	0.95	0.95	0.95
Percent Heavy Veh, %	2	1	0	2	0	1	2	1	6	0	0	0
Cap, veh/h	316	776	191	297	1173	511	383	503	283	488	1071	80
Arrive On Green	0.06	0.29	0.28	0.11	0.34	0.34	0.10	0.24	0.23	0.19	0.33	0.32
Sat Flow, veh/h	1688	2687	660	1688	3420	1490	1688	2079	1167	1714	3221	242
Grp Volume(v), veh/h	63	405	395	242	516	274	191	237	224	432	296	304
Grp Sat Flow(s),veh/h/ln	1688	1697	1650	1688	1710	1490	1688	1697	1549	1714	1710	1752
Q Serve(g_s), s	2.5	21.3	21.4	9.5	11.2	14.2	8.3	11.8	12.3	18.0	13.4	13.4
Cycle Q Clear(g_c), s	2.5	21.3	21.4	9.5	11.2	14.2	8.3	11.8	12.3	18.0	13.4	13.4
Prop In Lane	1.00		0.40	1.00		1.00	1.00		0.75	1.00		0.14
Lane Grp Cap(c), veh/h	316	490	477	297	1173	511	383	411	375	488	569	583
V/C Ratio(X)	0.20	0.83	0.83	0.81	0.44	0.54	0.50	0.58	0.60	0.89	0.52	0.52
Avail Cap(c_a), veh/h	501	567	552	389	1173	511	534	638	583	488	643	659
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	22.6	31.8	32.0	23.6	24.3	25.3	24.9	31.9	32.4	22.7	25.8	25.8
Incr Delay (d2), s/veh	0.1	9.5	9.8	7.4	0.4	1.4	0.4	1.8	2.2	17.0	1.1	1.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.0	9.8	9.6	4.3	4.5	5.1	3.3	5.0	4.8	9.3	5.5	5.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	22.7	41.2	41.8	31.0	24.7	26.8	25.2	33.7	34.5	39.7	26.8	26.9
LnGrp LOS	C	D	D	C	C	C	C	C	C	D	C	C
Approach Vol, veh/h		863			1032			652			1032	
Approach Delay, s/veh		40.1			26.7			31.5			32.2	
Approach LOS		D			C			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	12.0	27.3	9.5	36.9	13.5	35.8	14.8	31.6
Change Period (Y+Rc), s	3.0	* 4.8	3.0	* 4.7	3.0	4.8	3.0	4.7
Max Green Setting (Gmax), s	19.0	* 35	17.0	* 31	19.0	35.2	17.0	31.3
Max Q Clear Time (g_c+I1), s	10.0	14.3	4.5	16.2	10.3	15.4	11.5	23.4
Green Ext Time (p_c), s	0.0	2.9	0.1	4.8	0.3	3.7	0.3	3.2

Intersection Summary	
HCM 7th Control Delay, s/veh	32.4
HCM 7th LOS	C

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	170	720	20	20	470	230	10	50	20	240	80	80
Future Volume (veh/h)	170	720	20	20	470	230	10	50	20	240	80	80
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.04	1.04	1.04	1.04	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		0.97	0.99		0.99	0.99		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1730	1744	1800	1800	1772	1786	1872	1784	1711	1843	1872	1814
Adj Flow Rate, veh/h	173	735	20	23	547	267	15	76	30	312	104	104
Peak Hour Factor	0.98	0.98	0.98	0.86	0.86	0.86	0.66	0.66	0.66	0.77	0.77	0.77
Percent Heavy Veh, %	5	4	0	0	2	1	0	6	11	2	0	4
Cap, veh/h	249	973	26	307	590	288	288	332	131	374	233	233
Arrive On Green	0.07	0.58	0.57	0.03	0.53	0.53	0.27	0.27	0.27	0.27	0.27	0.27
Sat Flow, veh/h	1647	1689	46	1714	1110	542	1233	1212	479	1327	853	853
Grp Volume(v), veh/h	173	0	755	23	0	814	15	0	106	312	0	208
Grp Sat Flow(s),veh/h/ln	1647	0	1735	1714	0	1652	1233	0	1691	1327	0	1705
Q Serve(g_s), s	4.2	0.0	31.0	0.6	0.0	43.3	1.0	0.0	4.6	21.4	0.0	9.6
Cycle Q Clear(g_c), s	4.2	0.0	31.0	0.6	0.0	43.3	10.6	0.0	4.6	26.0	0.0	9.6
Prop In Lane	1.00		0.03	1.00		0.33	1.00		0.28	1.00		0.50
Lane Grp Cap(c), veh/h	249	0	999	307	0	878	288	0	463	374	0	467
V/C Ratio(X)	0.70	0.00	0.76	0.07	0.00	0.93	0.05	0.00	0.23	0.83	0.00	0.45
Avail Cap(c_a), veh/h	413	0	999	555	0	878	288	0	463	374	0	467
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	0.81	0.00	0.81
Uniform Delay (d), s/veh	20.8	0.0	15.1	13.2	0.0	20.6	32.9	0.0	26.8	37.3	0.0	28.7
Incr Delay (d2), s/veh	3.5	0.0	5.3	0.1	0.0	17.1	0.1	0.0	0.2	12.3	0.0	0.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.3	0.0	12.6	0.2	0.0	19.4	0.3	0.0	1.9	8.5	0.0	3.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	24.3	0.0	20.4	13.3	0.0	37.8	33.0	0.0	27.1	49.6	0.0	29.2
LnGrp LOS	C		C	B		D	C		C	D		C
Approach Vol, veh/h		928			837			121			520	
Approach Delay, s/veh		21.2			37.1			27.8			41.5	
Approach LOS		C			D			C			D	

Timer - Assigned Phs	2	3	4	6	7	8
Phs Duration (G+Y+Rc), s	30.0	10.5	54.5	30.0	6.3	58.7
Change Period (Y+Rc), s	4.6	4.0	4.6	4.6	4.0	4.6
Max Green Setting (Gmax), s	25.4	16.0	40.4	25.4	16.0	40.4
Max Q Clear Time (g_c+I1), s	12.6	6.2	45.3	28.0	2.6	33.0
Green Ext Time (p_c), s	0.3	0.4	0.0	0.0	0.0	2.3

Intersection Summary	
HCM 7th Control Delay, s/veh	31.4
HCM 7th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	910	140	0	0	0	0	0	0	250	1410	0
Future Volume (veh/h)	0	910	140	0	0	0	0	0	0	250	1410	0
Initial Q (Qb), veh	0	0	0							0	0	0
Lane Width Adj.	1.00	1.00	1.00							1.04	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.99							1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00							1.00	1.00	1.00
Work Zone On Approach		No									No	
Adj Sat Flow, veh/h/ln	0	1595	1595							1619	1557	0
Adj Flow Rate, veh/h	0	919	141							266	1500	0
Peak Hour Factor	0.99	0.99	0.99							0.94	0.94	0.94
Percent Heavy Veh, %	0	2	2							5	5	0
Cap, veh/h	0	1569	240							427	2408	0
Arrive On Green	0.00	0.41	0.41							0.51	0.51	0.00
Sat Flow, veh/h	0	3946	581							833	4917	0
Grp Volume(v), veh/h	0	701	359							484	1282	0
Grp Sat Flow(s),veh/h/ln	0	1451	1482							1515	1339	0
Q Serve(g_s), s	0.0	15.0	15.1							18.3	18.3	0.0
Cycle Q Clear(g_c), s	0.0	15.0	15.1							18.3	18.3	0.0
Prop In Lane	0.00		0.39							0.55		0.00
Lane Grp Cap(c), veh/h	0	1197	611							777	2059	0
V/C Ratio(X)	0.00	0.59	0.59							0.62	0.62	0.00
Avail Cap(c_a), veh/h	0	1197	611							777	2059	0
HCM Platoon Ratio	1.00	1.00	1.00							1.00	1.00	1.00
Upstream Filter(I)	0.00	0.98	0.98							0.76	0.76	0.00
Uniform Delay (d), s/veh	0.0	18.2	18.3							14.0	14.0	0.0
Incr Delay (d2), s/veh	0.0	2.1	4.0							2.9	1.1	0.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0							0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	5.0	5.5							6.3	5.2	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	0.0	20.3	22.4							16.8	15.1	0.0
LnGrp LOS		C	C							B	B	
Approach Vol, veh/h		1060									1766	
Approach Delay, s/veh		21.0									15.5	
Approach LOS		C									B	

Timer - Assigned Phs	2	4
Phs Duration (G+Y+Rc), s	44.0	36.0
Change Period (Y+Rc), s	4.6	4.6
Max Green Setting (Gmax), s	39.4	31.4
Max Q Clear Time (g_c+I1), s	20.3	17.1
Green Ext Time (p_c), s	0.9	0.4

Intersection Summary	
HCM 7th Control Delay, s/veh	17.6
HCM 7th LOS	B



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	50	900	220	200	830	140	130	120	200	270	250	70
Future Volume (veh/h)	50	900	220	200	830	140	130	120	200	270	250	70
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		0.99	1.00		0.99	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1716	1758	1800	1786	1772	1688	1660	1716	1786	1758	1744	1772
Adj Flow Rate, veh/h	56	1000	244	208	865	146	137	126	211	303	281	79
Peak Hour Factor	0.90	0.90	0.90	0.96	0.96	0.96	0.95	0.95	0.95	0.89	0.89	0.89
Percent Heavy Veh, %	6	3	0	1	2	8	10	6	1	3	4	2
Cap, veh/h	232	1126	274	227	1383	233	165	152	246	350	325	91
Arrive On Green	0.03	0.42	0.42	0.09	0.48	0.47	0.18	0.18	0.18	0.23	0.23	0.23
Sat Flow, veh/h	1634	2660	647	1701	2879	486	918	842	1368	1525	1415	398
Grp Volume(v), veh/h	56	627	617	208	506	505	249	0	225	331	0	332
Grp Sat Flow(s),veh/h/ln	1634	1670	1637	1701	1683	1682	1670	0	1459	1668	0	1670
Q Serve(g_s), s	3.2	56.4	57.0	12.8	36.4	36.4	23.4	0.0	24.4	31.1	0.0	31.1
Cycle Q Clear(g_c), s	3.2	56.4	57.0	12.8	36.4	36.4	23.4	0.0	24.4	31.1	0.0	31.1
Prop In Lane	1.00		0.40	1.00		0.29	0.55		0.94	0.91		0.24
Lane Grp Cap(c), veh/h	232	707	693	227	809	808	301	0	263	383	0	383
V/C Ratio(X)	0.24	0.89	0.89	0.92	0.63	0.63	0.83	0.00	0.86	0.87	0.00	0.87
Avail Cap(c_a), veh/h	347	707	693	250	809	808	426	0	372	532	0	533
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.81	0.81	0.81	1.00	1.00	1.00	1.00	0.00	1.00	0.96	0.00	0.96
Uniform Delay (d), s/veh	28.5	43.4	43.7	42.8	31.4	31.6	64.4	0.0	64.8	60.4	0.0	60.4
Incr Delay (d2), s/veh	0.2	11.1	11.8	32.2	3.6	3.6	7.9	0.0	11.6	10.2	0.0	10.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.3	25.3	25.1	10.6	15.6	15.6	10.7	0.0	10.0	14.3	0.0	14.3
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	28.6	54.5	55.5	75.0	35.1	35.2	72.3	0.0	76.4	70.6	0.0	70.6
LnGrp LOS	C	D	E	E	D	D	E		E	E		E
Approach Vol, veh/h		1300			1219			474			663	
Approach Delay, s/veh		53.9			41.9			74.3			70.6	
Approach LOS		D			D			E			E	

Timer - Assigned Phs	2	3	4		6	7	8
Phs Duration (G+Y+Rc), s	32.7	8.5	81.3		40.4	17.9	72.0
Change Period (Y+Rc), s	5.0	3.0	4.9		4.6	3.0	4.9
Max Green Setting (Gmax), s	40.0	17.0	38.1		50.4	17.0	38.1
Max Q Clear Time (g_c+I1), s	26.4	5.2	38.4		33.1	14.8	59.0
Green Ext Time (p_c), s	1.4	0.1	0.0		2.7	0.1	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	55.6
HCM 7th LOS	E



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	70	800	140	80	810	200	200	220	100	250	90	70
Future Volume (veh/h)	70	800	140	80	810	200	200	220	100	250	90	70
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1744	1772	1744	1716	1786	1786	1772	1758	1702	1744	1758	1786
Adj Flow Rate, veh/h	71	816	143	91	920	0	247	272	123	305	110	85
Peak Hour Factor	0.98	0.98	0.98	0.88	0.88	0.88	0.81	0.81	0.81	0.82	0.82	0.82
Percent Heavy Veh, %	4	2	4	6	1	1	2	3	7	4	3	1
Cap, veh/h	162	1004	439	188	1043		313	754	332	264	732	521
Arrive On Green	0.04	0.30	0.30	0.05	0.31	0.00	0.10	0.33	0.33	0.16	0.39	0.39
Sat Flow, veh/h	1661	3367	1472	1634	3393	1514	3274	2255	992	1661	1862	1325
Grp Volume(v), veh/h	71	816	143	91	920	0	247	199	196	305	98	97
Grp Sat Flow(s),veh/h/ln	1661	1683	1472	1634	1697	1514	1637	1670	1577	1661	1670	1517
Q Serve(g_s), s	3.6	27.5	9.3	4.7	31.6	0.0	9.1	11.1	11.6	19.5	4.6	5.1
Cycle Q Clear(g_c), s	3.6	27.5	9.3	4.7	31.6	0.0	9.1	11.1	11.6	19.5	4.6	5.1
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.63	1.00		0.87
Lane Grp Cap(c), veh/h	162	1004	439	188	1043		313	558	527	264	657	597
V/C Ratio(X)	0.44	0.81	0.33	0.48	0.88		0.79	0.36	0.37	1.16	0.15	0.16
Avail Cap(c_a), veh/h	305	1090	476	447	1181		667	558	527	264	657	597
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	32.0	39.9	33.4	31.0	40.4	0.0	54.2	30.9	31.0	51.6	24.0	24.1
Incr Delay (d2), s/veh	1.8	4.5	0.4	1.9	7.4	0.0	4.4	1.8	2.0	103.9	0.5	0.6
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.5	11.8	3.3	1.9	14.0	0.0	3.9	4.8	4.7	15.6	1.9	1.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	33.8	44.3	33.9	32.9	47.8	0.0	58.7	32.7	33.0	155.5	24.4	24.7
LnGrp LOS	C	D	C	C	D		E	C	C	F	C	C
Approach Vol, veh/h		1030			1011			642			500	
Approach Delay, s/veh		42.1			46.4			42.8			104.4	
Approach LOS		D			D			D			F	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	10.6	41.9	24.0	46.2	9.5	43.0	16.7	53.5
Change Period (Y+Rc), s	4.0	5.3	4.5	5.2	4.0	5.3	5.0	* 5.2
Max Green Setting (Gmax), s	26.6	39.7	19.5	41.0	16.0	42.7	25.0	* 35
Max Q Clear Time (g_c+I1), s	6.7	29.5	21.5	13.6	5.6	33.6	11.1	7.1
Green Ext Time (p_c), s	0.2	4.3	0.0	2.5	0.1	4.1	0.7	1.1

Intersection Summary	
HCM 7th Control Delay, s/veh	53.4
HCM 7th LOS	D

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.
Unsignalized Delay for [WBR] is excluded from calculations of the approach delay and intersection delay.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	280	260	50	340	140	270	70	710	170	210	800	20
Future Volume (veh/h)	280	260	50	340	140	270	70	710	170	210	800	20
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.04	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.99	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.99
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1786	1772	1786	1772	1786	1857	1772	1772	1772	1772	1772	1786
Adj Flow Rate, veh/h	219	418	0	256	298	0	75	763	183	216	825	21
Peak Hour Factor	0.90	0.90	0.90	0.94	0.94	0.94	0.93	0.93	0.93	0.97	0.97	0.97
Percent Heavy Veh, %	1	2	1	2	1	1	2	2	2	2	2	1
Cap, veh/h	291	606		339	359		110	1081	478	203	1257	32
Arrive On Green	0.17	0.17	0.00	0.20	0.20	0.00	0.06	0.32	0.32	0.12	0.38	0.36
Sat Flow, veh/h	1701	3544	0	1688	1786	1574	1688	3367	1490	1688	3340	85
Grp Volume(v), veh/h	219	418	0	256	298	0	75	763	183	216	416	430
Grp Sat Flow(s),veh/h/ln	1701	1772	0	1688	1786	1574	1688	1683	1490	1688	1683	1742
Q Serve(g_s), s	11.4	10.3	0.0	13.3	14.9	0.0	4.1	18.5	8.9	11.2	19.1	19.1
Cycle Q Clear(g_c), s	11.4	10.3	0.0	13.3	14.9	0.0	4.1	18.5	8.9	11.2	19.1	19.1
Prop In Lane	1.00		0.00	1.00		1.00	1.00		1.00	1.00		0.05
Lane Grp Cap(c), veh/h	291	606		339	359		110	1081	478	203	634	656
V/C Ratio(X)	0.75	0.69		0.76	0.83		0.68	0.71	0.38	1.06	0.66	0.66
Avail Cap(c_a), veh/h	433	902		429	454		203	1590	704	203	795	823
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	36.7	36.3	0.0	35.1	35.7	0.0	42.6	27.8	24.5	41.0	24.1	24.1
Incr Delay (d2), s/veh	1.7	0.5	0.0	4.1	8.2	0.0	2.8	1.5	0.9	81.4	2.1	2.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.8	4.4	0.0	5.8	7.2	0.0	1.7	7.1	3.0	9.0	7.3	7.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	38.4	36.8	0.0	39.2	43.9	0.0	45.4	29.2	25.3	122.3	26.2	26.2
LnGrp LOS	D	D		D	D		D	C	C	F	C	C
Approach Vol, veh/h		637			554			1021			1062	
Approach Delay, s/veh		37.4			41.7			29.7			45.7	
Approach LOS		D			D			C			D	

Timer - Assigned Phs	1	2		4	5	6		8
Phs Duration (G+Y+Rc), s	16.0	33.9		23.0	10.9	39.1		20.2
Change Period (Y+Rc), s	4.0	5.7		4.9	4.0	5.7		4.9
Max Green Setting (Gmax), s	12.0	42.3		23.1	12.0	42.3		23.1
Max Q Clear Time (g_c+I1), s	13.3	20.5		16.9	6.1	21.1		13.4
Green Ext Time (p_c), s	0.0	7.7		0.8	0.0	6.3		1.3

Intersection Summary	
HCM 7th Control Delay, s/veh	38.4
HCM 7th LOS	D

Notes

User approved volume balancing among the lanes for turning movement.

Unsignalized Delay for [EBR, WBR] is excluded from calculations of the approach delay and intersection delay.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	70	1900	100	180	1670	300	210	130	190	220	40	50
Future Volume (veh/h)	70	1900	100	180	1670	300	210	130	190	220	40	50
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1856	1856	1811	1870	1856	1885	1885	1841	1856	1841	1885
Adj Flow Rate, veh/h	74	2021	0	189	1758	0	256	159	0	237	43	54
Peak Hour Factor	0.94	0.94	0.94	0.95	0.95	0.95	0.82	0.82	0.82	0.93	0.93	0.93
Percent Heavy Veh, %	2	3	3	6	2	3	1	1	4	3	4	1
Cap, veh/h	128	1433		279	1485		344	212		273	125	157
Arrive On Green	0.07	0.41	0.00	0.08	0.42	0.00	0.10	0.11	0.00	0.15	0.17	0.17
Sat Flow, veh/h	1781	3526	1572	3346	3554	1572	3483	1885	1560	1767	741	930
Grp Volume(v), veh/h	74	2021	0	189	1758	0	256	159	0	237	0	97
Grp Sat Flow(s),veh/h/ln	1781	1763	1572	1673	1777	1572	1742	1885	1560	1767	0	1671
Q Serve(g_s), s	3.8	38.8	0.0	5.2	39.9	0.0	6.8	7.8	0.0	12.5	0.0	4.9
Cycle Q Clear(g_c), s	3.8	38.8	0.0	5.2	39.9	0.0	6.8	7.8	0.0	12.5	0.0	4.9
Prop In Lane	1.00		1.00	1.00		1.00	1.00		1.00	1.00		0.56
Lane Grp Cap(c), veh/h	128	1433		279	1485		344	212		273	0	281
V/C Ratio(X)	0.58	1.41		0.68	1.18		0.75	0.75		0.87	0.00	0.34
Avail Cap(c_a), veh/h	364	1433		684	1485		712	474		361	0	420
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	42.9	28.3	0.0	42.5	27.8	0.0	41.8	41.0	0.0	39.4	0.0	35.0
Incr Delay (d2), s/veh	4.0	188.7	0.0	2.9	90.0	0.0	3.2	5.3	0.0	15.7	0.0	0.7
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.8	52.3	0.0	2.2	33.7	0.0	3.0	3.8	0.0	6.3	0.0	2.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	46.9	217.0	0.0	45.4	117.8	0.0	45.1	46.3	0.0	55.1	0.0	35.8
LnGrp LOS	D	F		D	F		D	D		E		D
Approach Vol, veh/h		2095			1947			415			334	
Approach Delay, s/veh		211.0			110.8			45.5			49.5	
Approach LOS		F			F			D			D	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	10.3	16.7	12.4	46.1	14.9	22.1	13.4	45.0
Change Period (Y+Rc), s	5.5	6.0	5.5	* 6.2	5.5	6.0	5.5	* 6.2
Max Green Setting (Gmax), s	19.5	24.0	19.5	* 39	19.5	24.0	19.5	* 39
Max Q Clear Time (g_c+I1), s	14.5	9.8	5.8	41.9	8.8	6.9	7.2	40.8
Green Ext Time (p_c), s	0.3	0.6	0.1	0.0	0.6	0.4	0.4	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	144.7
HCM 7th LOS	F

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.

Unsignalized Delay for [NBR, EBR, WBR] is excluded from calculations of the approach delay and intersection delay.

Intersection	
Int Delay, s/veh	49.7

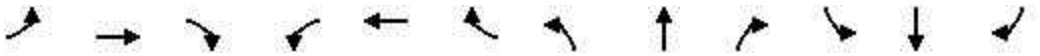
Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	610	0	470	320	0	540
Future Vol, veh/h	610	0	470	320	0	540
Conflicting Peds, #/hr	0	1	1	0	2	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	75	-	-	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	86	86	92	92	96	96
Heavy Vehicles, %	1	1	1	2	1	1
Mvmt Flow	709	0	511	348	0	563

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	-	710	0	-	710
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	-	4.11	-	-	6.21
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	-	2.209	-	-	3.309
Pot Cap-1 Maneuver	-	0	894	-	0	~ 435
Stage 1	-	0	-	-	0	-
Stage 2	-	0	-	-	0	-
Platoon blocked, %	-			-		
Mov Cap-1 Maneuver	-	-	893	-	-	~ 435
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	EB	WB	NB
HCM Control Delay, s/v	0	8.5	175.32
HCM LOS			F

Minor Lane/Major Mvmt	NBLn1	EBT	WBL	WBT
Capacity (veh/h)	435	-	893	-
HCM Lane V/C Ratio	1.294	-	0.572	-
HCM Control Delay (s/veh)	175.3	-	14.3	-
HCM Lane LOS	F	-	B	-
HCM 95th %tile Q(veh)	24.6	-	3.7	-

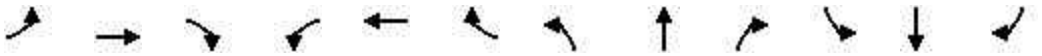
Notes			
~: Volume exceeds capacity	$: Delay exceeds 300s	+: Computation Not Defined	*: All major volume in platoon



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	0	590	120	540	690	0	0	0	0	110	350	50
Future Volume (vph)	0	590	120	540	690	0	0	0	0	110	350	50
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	12	12	12	12	12	12	12	12	12	14	14	14
Total Lost time (s)		4.0		3.5	4.0						4.0	
Lane Util. Factor		0.95		1.00	0.95						0.95	
Frpb, ped/bikes		1.00		1.00	1.00						1.00	
Flpb, ped/bikes		1.00		1.00	1.00						1.00	
Frt		0.97		1.00	1.00						0.99	
Flt Protected		1.00		0.95	1.00						0.99	
Satd. Flow (prot)		3241		1583	3294						3357	
Flt Permitted		1.00		0.15	1.00						0.99	
Satd. Flow (perm)		3241		256	3294						3357	
Peak-hour factor, PHF	0.90	0.90	0.90	0.93	0.93	0.93	0.92	0.92	0.92	0.88	0.88	0.88
Adj. Flow (vph)	0	656	133	581	742	0	0	0	0	125	398	57
RTOR Reduction (vph)	0	19	0	0	0	0	0	0	0	0	9	0
Lane Group Flow (vph)	0	770	0	581	742	0	0	0	0	0	571	0
Confl. Peds. (#/hr)	12		6	6		12	7					7
Heavy Vehicles (%)	0%	2%	5%	8%	3%	0%	0%	0%	0%	7%	6%	1%
Bus Blockages (#/hr)	0	0	4	0	4	0	0	0	0	0	0	2
Turn Type		NA		pm+pt	NA					Perm	NA	
Protected Phases		8		7	4						2	
Permitted Phases				4						2		
Actuated Green, G (s)		21.4		46.9	46.4						34.1	
Effective Green, g (s)		22.0		47.5	47.0						35.0	
Actuated g/C Ratio		0.24		0.53	0.52						0.39	
Clearance Time (s)		4.6		4.1	4.6						4.9	
Lane Grp Cap (vph)		792		452	1720						1305	
v/s Ratio Prot		0.24		c0.31	0.23							
v/s Ratio Perm				c0.37							0.17	
v/c Ratio		0.97		1.29	0.43						0.44	
Uniform Delay, d1		33.7		28.9	13.3						20.3	
Progression Factor		1.00		1.00	1.00						1.00	
Incremental Delay, d2		25.9		144.4	0.8						1.1	
Delay (s)		59.6		173.3	14.1						21.3	
Level of Service		E		F	B						C	
Approach Delay (s/veh)		59.6			84.0			0.0			21.3	
Approach LOS		E			F			A			C	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	63.3	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	0.94		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	11.5
Intersection Capacity Utilization	81.3%	ICU Level of Service	D
Analysis Period (min)	15		
Description: date collected 3/21/2019			

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	300	730	220	130	720	180	360	1030	110	140	870	250
Future Volume (vph)	300	730	220	130	720	180	360	1030	110	140	870	250
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	11	12	12	11	12	13	11	11	12	11	11	12
Total Lost time (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0
Lane Util. Factor	0.97	0.95	1.00	0.97	0.95	1.00	1.00	0.91	1.00	1.00	0.91	1.00
Frpb, ped/bikes	1.00	1.00	0.97	1.00	1.00	0.98	1.00	1.00	0.98	1.00	1.00	0.98
Flpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	3144	3320	1444	3113	3386	1532	1653	4657	1463	1637	4568	1503
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	3144	3320	1444	3113	3386	1532	1653	4657	1463	1637	4568	1503
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	316	768	232	137	758	189	379	1084	116	147	916	263
RTOR Reduction (vph)	0	0	78	0	0	136	0	0	65	0	0	172
Lane Group Flow (vph)	316	768	154	137	758	53	379	1084	51	147	916	91
Confl. Peds. (#/hr)	7		12	12		7	4		9	9		4
Heavy Vehicles (%)	2%	3%	3%	3%	1%	1%	0%	2%	2%	1%	4%	0%
Turn Type	Prot	NA	Perm	Prot	NA	Perm	Prot	NA	Perm	Prot	NA	Perm
Protected Phases	3	8		7	4		5	2		1	6	
Permitted Phases			8			4			2			6
Actuated Green, G (s)	20.6	47.4	47.4	11.7	38.7	38.7	40.8	68.6	68.6	17.1	44.9	44.9
Effective Green, g (s)	22.6	49.6	49.6	13.7	40.7	40.7	42.8	70.6	70.6	19.1	46.9	46.9
Actuated g/C Ratio	0.14	0.30	0.30	0.08	0.25	0.25	0.26	0.43	0.43	0.12	0.28	0.28
Clearance Time (s)	5.0	5.2	5.2	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0
Vehicle Extension (s)	2.0	3.0	3.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	3.0	3.0
Lane Grp Cap (vph)	430	998	434	258	835	377	428	1992	625	189	1298	427
v/s Ratio Prot	c0.10	0.23		0.04	c0.22		c0.23	0.23		0.09	c0.20	
v/s Ratio Perm			0.11			0.03			0.04			0.06
v/c Ratio	0.73	0.77	0.35	0.53	0.91	0.14	0.89	0.54	0.08	0.78	0.71	0.21
Uniform Delay, d1	68.3	52.5	45.2	72.6	60.3	48.5	58.7	35.2	28.0	70.9	52.9	45.0
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	5.5	3.6	0.5	1.1	13.2	0.1	18.7	1.1	0.3	16.6	3.2	1.1
Delay (s)	73.9	56.1	45.7	73.6	73.5	48.6	77.5	36.3	28.2	87.5	56.1	46.1
Level of Service	E	E	D	E	E	D	E	D	C	F	E	D
Approach Delay (s/veh)		58.5			69.2			45.6			57.6	
Approach LOS		E			E			D			E	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	56.6	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	0.81		
Actuated Cycle Length (s)	165.0	Sum of lost time (s)	12.0
Intersection Capacity Utilization	94.0%	ICU Level of Service	F
Analysis Period (min)	15		
Description: date collected 12/12/2023			

c Critical Lane Group



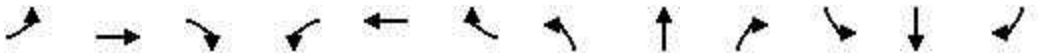
Movement	WBL	WBR	WBR2	NBL	NBT	NBR	SBL	SBT	SBR	SEL2	SEL	SER
Lane Configurations												
Traffic Volume (vph)	240	740	686	230	830	230	0	0	0	51	701	441
Future Volume (vph)	240	740	686	230	830	230	0	0	0	51	701	441
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	12	12	13	12	12	12	12	12	12	12	12	13
Total Lost time (s)	3.0	3.0	3.0		3.0	3.0				3.0	3.0	2.6
Lane Util. Factor	1.00	0.88	1.00		0.95	1.00				1.00	0.97	1.00
Frpb, ped/bikes	1.00	1.00	0.98		1.00	1.00				1.00	1.00	1.00
Flpb, ped/bikes	1.00	1.00	1.00		1.00	1.00				1.00	1.00	1.00
Frt	1.00	0.85	0.85		1.00	0.85				1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00		0.99	1.00				0.95	0.95	1.00
Satd. Flow (prot)	1629	2554	1470		3290	1500				1629	3147	1487
Flt Permitted	0.95	1.00	1.00		0.99	1.00				0.95	0.95	1.00
Satd. Flow (perm)	1629	2554	1470		3290	1500				1629	3147	1487
Peak-hour factor, PHF	0.96	0.96	0.96	0.94	0.94	0.94	0.92	0.92	0.92	0.93	0.93	0.93
Adj. Flow (vph)	250	771	715	245	883	245	0	0	0	55	754	474
RTOR Reduction (vph)	0	0	310	0	0	151	0	0	0	0	0	24
Lane Group Flow (vph)	250	771	405	0	1128	94	0	0	0	55	754	450
Confl. Peds. (#/hr)	11		10	2					2	10		11
Heavy Vehicles (%)	5%	5%	5%	2%	2%	2%	2%	2%	2%	5%	5%	5%
Bus Blockages (#/hr)	0	2	0	0	4	0	0	0	0	0	2	2
Turn Type	Prot	Prot	Perm	Split	NA	Perm				Prot	Prot	pt+ov
Protected Phases	7	6		8	8					5	5 6	6 8
Permitted Phases			6			8						5 6
Actuated Green, G (s)	10.8	23.8	23.8		31.3	31.3				10.4	38.4	70.1
Effective Green, g (s)	12.0	25.0	25.0		32.9	32.9				12.0	37.4	70.3
Actuated g/C Ratio	0.13	0.27	0.27		0.35	0.35				0.13	0.40	0.75
Clearance Time (s)	4.2	4.2	4.2		4.6	4.6				4.6		
Vehicle Extension (s)	2.0	3.5	3.5		2.5	2.5				2.0		
Lane Grp Cap (vph)	208	679	391		1152	525				208	1253	1154
v/s Ratio Prot	c0.15	c0.30			c0.34					0.03	c0.24	0.24
v/s Ratio Perm			0.28			0.06						0.06
v/c Ratio	1.20	1.14	1.04		0.98	0.18				0.26	0.60	0.39
Uniform Delay, d1	41.0	34.5	34.5		30.2	21.1				37.0	22.4	4.2
Progression Factor	1.00	1.00	1.00		1.00	1.00				0.80	0.72	0.89
Incremental Delay, d2	127.6	78.3	55.3		21.3	0.1				0.2	0.4	0.2
Delay (s)	168.5	112.7	89.8		51.5	21.3				29.8	16.4	3.9
Level of Service	F	F	F		D	C				C	B	A
Approach Delay (s/veh)	111.3				46.1			0.0			12.4	
Approach LOS	F				D			A			B	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	62.0	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	1.19		
Actuated Cycle Length (s)	93.9	Sum of lost time (s)	24.8
Intersection Capacity Utilization	83.8%	ICU Level of Service	E
Analysis Period (min)	15		
Description: date collected 10/5/2022			
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	0	570	0	0	410	400	100	2240	10	0	0	0
Future Volume (vph)	0	570	0	0	410	400	100	2240	10	0	0	0
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	12	12	12	12	11	11	11	11	11	12	12	12
Total Lost time (s)		3.5			3.5		3.5	3.5				
Lane Util. Factor		0.95			0.95		1.00	0.91				
Frpb, ped/bikes		1.00			0.99		1.00	1.00				
Flpb, ped/bikes		1.00			1.00		0.98	1.00				
Frt		1.00			0.93		1.00	1.00				
Flt Protected		1.00			1.00		0.95	1.00				
Satd. Flow (prot)		3294			2942		1573	4652				
Flt Permitted		1.00			1.00		0.95	1.00				
Satd. Flow (perm)		3294			2942		1573	4652				
Peak-hour factor, PHF	0.80	0.80	0.80	0.79	0.79	0.79	0.99	0.99	0.99	0.92	0.92	0.92
Adj. Flow (vph)	0	712	0	0	519	506	101	2263	10	0	0	0
RTOR Reduction (vph)	0	0	0	0	3	0	0	0	0	0	0	0
Lane Group Flow (vph)	0	713	0	0	1022	0	101	2273	0	0	0	0
Confl. Peds. (#/hr)	9		18	18		9	16		29	29		16
Heavy Vehicles (%)	0%	3%	0%	0%	3%	1%	3%	2%	6%	0%	0%	0%
Bus Blockages (#/hr)	0	4	0	0	4	0	0	0	0	0	0	0
Turn Type		NA			NA		Perm	NA				
Protected Phases		4			4			2				
Permitted Phases							2					
Actuated Green, G (s)		26.5			26.5		52.5	52.5				
Effective Green, g (s)		28.5			28.5		54.5	54.5				
Actuated g/C Ratio		0.32			0.32		0.61	0.61				
Clearance Time (s)		5.5			5.5		5.5	5.5				
Lane Grp Cap (vph)		1043			931		952	2817				
v/s Ratio Prot		0.22			c0.35			c0.49				
v/s Ratio Perm							0.06					
v/c Ratio		0.68			1.10		0.11	0.81				
Uniform Delay, d1		26.8			30.8		7.5	13.7				
Progression Factor		1.02			1.00		0.38	0.31				
Incremental Delay, d2		3.6			59.8		0.2	2.1				
Delay (s)		31.0			90.5		3.0	6.4				
Level of Service		C			F		A	A				
Approach Delay (s/veh)		31.0			90.5			6.2			0.0	
Approach LOS		C			F			A			A	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	31.5	HCM 2000 Level of Service	C
HCM 2000 Volume to Capacity ratio	0.91		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	7.0
Intersection Capacity Utilization	78.6%	ICU Level of Service	D
Analysis Period (min)	15		
Description: date collected 4/27/2023			

c Critical Lane Group



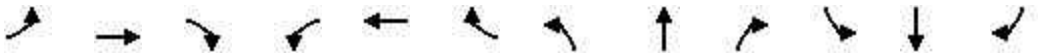
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	220	490	0	0	480	150	220	2180	170	0	0	0
Future Volume (vph)	220	490	0	0	480	150	220	2180	170	0	0	0
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	11	12	12	12	12	12	13	13	13	12	12	12
Total Lost time (s)	4.6	5.2			5.2		5.2	5.2				
Lane Util. Factor	1.00	0.95			0.95		1.00	0.91				
Frpb, ped/bikes	1.00	1.00			1.00		1.00	1.00				
Flpb, ped/bikes	1.00	1.00			1.00		1.00	1.00				
Frt	1.00	1.00			0.96		1.00	0.99				
Flt Protected	0.95	1.00			1.00		0.95	1.00				
Satd. Flow (prot)	1604	3340			3230		1759	4892				
Flt Permitted	0.24	1.00			1.00		0.95	1.00				
Satd. Flow (perm)	397	3340			3230		1759	4892				
Peak-hour factor, PHF	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97
Adj. Flow (vph)	227	505	0	0	495	155	227	2247	175	0	0	0
RTOR Reduction (vph)	0	0	0	0	31	0	0	9	0	0	0	0
Lane Group Flow (vph)	227	505	0	0	619	0	227	2413	0	0	0	0
Confl. Peds. (#/hr)	5		5	5		5	5		5	5		5
Heavy Vehicles (%)	3%	2%	0%	0%	1%	2%	0%	2%	2%	0%	0%	0%
Bus Blockages (#/hr)	0	2	0	0	2	0	0	4	0	0	0	0
Turn Type	pm+pt	NA			NA		Perm	NA				
Protected Phases	4	8			3			2				
Permitted Phases	8						2					
Actuated Green, G (s)	42.0	41.4			23.4		44.4	44.4				
Effective Green, g (s)	41.4	40.8			22.8		43.8	43.8				
Actuated g/C Ratio	0.44	0.43			0.24		0.46	0.46				
Clearance Time (s)	4.0	4.6			4.6		4.6	4.6				
Vehicle Extension (s)	1.0	3.0			3.0		3.0	3.0				
Lane Grp Cap (vph)	343	1434			775		810	2255				
v/s Ratio Prot	c0.09	0.15			c0.19			c0.49				
v/s Ratio Perm	0.19						0.13					
v/c Ratio	0.66	0.35			0.80		0.28	1.07				
Uniform Delay, d1	29.1	18.2			33.9		15.8	25.6				
Progression Factor	1.00	1.00			1.00		1.00	1.00				
Incremental Delay, d2	3.7	0.7			8.4		0.9	40.9				
Delay (s)	32.8	18.9			42.4		16.7	66.5				
Level of Service	C	B			D		B	E				
Approach Delay (s/veh)		23.2			42.4			62.2			0.0	
Approach LOS		C			D			E			A	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	51.9	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.93		
Actuated Cycle Length (s)	95.0	Sum of lost time (s)	15.0
Intersection Capacity Utilization	93.0%	ICU Level of Service	F
Analysis Period (min)	15		
Description: date collected 12/13/2023			
c Critical Lane Group			

Alternative 2 Synchro Reports

HCM 7th Signalized Intersection Summary
2: Division St & Wellesley Ave

11/05/2025



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	350	610	150	200	630	120	360	1070	210	100	1130	140
Future Volume (veh/h)	350	610	150	200	630	120	360	1070	210	100	1130	140
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.04	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.97	1.00		0.96	1.00		0.98	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1800	1744	1758	1800	1772	1843	1800	1786	1772	1772	1772	1786
Adj Flow Rate, veh/h	376	656	161	215	677	129	387	1151	226	108	1215	151
Peak Hour Factor	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93
Percent Heavy Veh, %	0	4	3	0	2	2	0	1	2	2	2	1
Cap, veh/h	314	702	172	234	746	332	301	2036	617	128	1381	172
Arrive On Green	0.18	0.27	0.26	0.14	0.22	0.22	0.18	0.42	0.42	0.08	0.32	0.31
Sat Flow, veh/h	1714	2617	642	1714	3367	1500	1714	4876	1478	1688	4346	540
Grp Volume(v), veh/h	376	415	402	215	677	129	387	1151	226	108	902	464
Grp Sat Flow(s),veh/h/ln	1714	1657	1602	1714	1683	1500	1714	1625	1478	1688	1612	1661
Q Serve(g_s), s	30.2	40.4	40.5	20.4	32.3	12.1	29.0	29.7	17.3	10.4	43.7	43.7
Cycle Q Clear(g_c), s	30.2	40.4	40.5	20.4	32.3	12.1	29.0	29.7	17.3	10.4	43.7	43.7
Prop In Lane	1.00		0.40	1.00		1.00	1.00		1.00	1.00		0.33
Lane Grp Cap(c), veh/h	314	444	430	234	746	332	301	2036	617	128	1025	528
V/C Ratio(X)	1.20	0.93	0.94	0.92	0.91	0.39	1.28	0.57	0.37	0.84	0.88	0.88
Avail Cap(c_a), veh/h	314	444	430	303	775	346	301	2036	617	215	1025	528
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	67.4	59.0	59.3	70.3	62.6	54.7	68.0	36.6	33.0	75.3	53.3	53.5
Incr Delay (d2), s/veh	115.9	26.8	27.8	27.6	14.0	0.5	150.9	1.1	1.7	13.9	10.7	18.6
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	23.4	20.3	19.8	10.8	15.3	4.7	25.4	12.2	6.6	5.0	19.3	21.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	183.3	85.8	87.1	97.9	76.6	55.2	218.9	37.8	34.7	89.2	64.0	72.0
LnGrp LOS	F	F	F	F	E	E	F	D	C	F	E	E
Approach Vol, veh/h		1193			1021			1764			1474	
Approach Delay, s/veh		117.0			78.4			77.1			68.4	
Approach LOS		F			E			E			E	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	16.5	72.9	35.0	40.6	33.0	56.4	27.3	48.2
Change Period (Y+Rc), s	4.0	5.0	4.4	5.4	4.0	5.0	4.4	5.4
Max Green Setting (Gmax), s	21.0	58.0	30.6	36.6	29.0	50.0	29.6	37.6
Max Q Clear Time (g_c+I1), s	12.4	31.7	32.2	34.3	31.0	45.7	22.4	42.5
Green Ext Time (p_c), s	0.2	7.9	0.0	0.8	0.0	2.6	0.5	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	83.7
HCM 7th LOS	F



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	750	120	190	870	0	0	0	0	80	810	100
Future Volume (veh/h)	0	750	120	190	870	0	0	0	0	80	810	100
Initial Q (Qb), veh	0	0	0	0	0	0				0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00				1.04	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00				1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Work Zone On Approach		No			No						No	
Adj Sat Flow, veh/h/ln	0	1786	1772	1786	1786	0				1843	1843	1843
Adj Flow Rate, veh/h	0	773	124	224	1024	0				85	862	106
Peak Hour Factor	0.97	0.97	0.97	0.85	0.85	0.85				0.94	0.94	0.94
Percent Heavy Veh, %	0	1	2	1	1	0				2	2	2
Cap, veh/h	0	897	144	238	1480	0				138	1403	173
Arrive On Green	0.00	0.31	0.30	0.09	0.44	0.00				0.48	0.48	0.47
Sat Flow, veh/h	0	3018	470	1701	3483	0				291	2950	363
Grp Volume(v), veh/h	0	448	449	224	1024	0				534	0	519
Grp Sat Flow(s),veh/h/ln	0	1697	1701	1701	1697	0				1828	0	1776
Q Serve(g_s), s	0.0	24.9	24.9	7.7	24.4	0.0				21.6	0.0	21.7
Cycle Q Clear(g_c), s	0.0	24.9	24.9	7.7	24.4	0.0				21.6	0.0	21.7
Prop In Lane	0.00		0.28	1.00		0.00				0.16		0.20
Lane Grp Cap(c), veh/h	0	520	521	238	1480	0				870	0	845
V/C Ratio(X)	0.00	0.86	0.86	0.94	0.69	0.00				0.61	0.00	0.61
Avail Cap(c_a), veh/h	0	655	657	238	1751	0				870	0	845
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Upstream Filter(I)	0.00	0.89	0.89	0.71	0.71	0.00				1.00	0.00	1.00
Uniform Delay (d), s/veh	0.0	32.7	32.8	43.6	22.8	0.0				19.4	0.0	19.5
Incr Delay (d2), s/veh	0.0	8.5	8.5	34.2	0.7	0.0				3.2	0.0	3.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0				0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	11.2	11.3	7.4	9.5	0.0				9.6	0.0	9.4
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	0.0	41.2	41.3	77.8	23.4	0.0				22.7	0.0	22.8
LnGrp LOS		D	D	E	C					C		C
Approach Vol, veh/h		897			1248						1053	
Approach Delay, s/veh		41.2			33.2						22.7	
Approach LOS		D			C						C	

Timer - Assigned Phs				4		6	7	8				
Phs Duration (G+Y+Rc), s				48.0		52.0	13.0	35.0				
Change Period (Y+Rc), s				5.0		5.0	5.0	5.0				
Max Green Setting (Gmax), s				51.0		39.0	8.0	38.0				
Max Q Clear Time (g_c+I1), s				26.4		23.7	9.7	26.9				
Green Ext Time (p_c), s				5.6		4.4	0.0	3.1				

Intersection Summary												
HCM 7th Control Delay, s/veh			32.0									
HCM 7th LOS			C									



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	40	1020	130	180	1450	40	430	90	140	50	60	40
Future Volume (veh/h)	40	1020	130	180	1450	40	430	90	140	50	60	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.04	1.04	1.00	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.99	1.00		0.96
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1800	1772	1786	1744	1800	1800	1800	1872	1828	1800	1872	1872
Adj Flow Rate, veh/h	44	1133	144	207	1667	46	344	240	146	79	95	63
Peak Hour Factor	0.90	0.90	0.90	0.87	0.87	0.87	0.96	0.96	0.96	0.63	0.63	0.63
Percent Heavy Veh, %	0	2	1	4	0	0	0	0	3	0	0	0
Cap, veh/h	155	1394	177	264	1688	46	393	249	151	135	81	54
Arrive On Green	0.05	0.46	0.45	0.09	0.50	0.49	0.23	0.23	0.21	0.08	0.08	0.06
Sat Flow, veh/h	1714	3005	381	1661	3400	94	1714	1085	660	1714	1032	684
Grp Volume(v), veh/h	44	634	643	207	836	877	344	0	386	79	0	158
Grp Sat Flow(s),veh/h/ln	1714	1683	1703	1661	1710	1783	1714	0	1744	1714	0	1716
Q Serve(g_s), s	1.5	36.6	36.8	7.1	54.5	55.0	21.9	0.0	24.8	5.0	0.0	8.9
Cycle Q Clear(g_c), s	1.5	36.6	36.8	7.1	54.5	55.0	21.9	0.0	24.8	5.0	0.0	8.9
Prop In Lane	1.00		0.22	1.00		0.05	1.00		0.38	1.00		0.40
Lane Grp Cap(c), veh/h	155	781	790	264	849	885	393	0	400	135	0	135
V/C Ratio(X)	0.28	0.81	0.81	0.78	0.99	0.99	0.88	0.00	0.97	0.59	0.00	1.17
Avail Cap(c_a), veh/h	261	781	790	411	849	885	393	0	400	135	0	135
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	25.7	26.0	26.3	23.2	28.0	28.2	42.0	0.0	43.5	50.3	0.0	52.4
Incr Delay (d2), s/veh	0.4	6.8	6.9	2.1	27.2	27.8	18.6	0.0	35.7	7.7	0.0	129.9
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.6	15.4	15.8	2.7	27.2	28.7	11.2	0.0	14.6	2.4	0.0	8.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	26.1	32.8	33.1	25.3	55.2	56.0	60.6	0.0	79.2	58.0	0.0	182.3
LnGrp LOS	C	C	C	C	E	E	E		E	E		F
Approach Vol, veh/h		1321			1920			730			237	
Approach Delay, s/veh		32.7			52.4			70.4			140.9	
Approach LOS		C			D			E			F	

Timer - Assigned Phs	2	3	4		6	7	8
Phs Duration (G+Y+Rc), s	30.0	10.0	61.0		12.0	14.0	57.0
Change Period (Y+Rc), s	6.0	4.0	6.0		5.0	4.0	6.0
Max Green Setting (Gmax), s	24.0	13.0	55.0		7.0	20.0	48.0
Max Q Clear Time (g_c+I1), s	26.8	3.5	57.0		10.9	9.1	38.8
Green Ext Time (p_c), s	0.0	0.0	0.0		0.0	0.3	5.5

Intersection Summary	
HCM 7th Control Delay, s/veh	54.3
HCM 7th LOS	D

Notes

User approved pedestrian interval to be less than phase max green.
User approved volume balancing among the lanes for turning movement.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	230	520	160	100	420	360	70	1000	70	230	720	40
Future Volume (veh/h)	230	520	160	100	420	360	70	1000	70	230	720	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.04	1.04	1.00	1.04	1.04	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		0.99	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1744	1857	1814	1786	1843	1843	1786	1758	1786	1758	1730	1786
Adj Flow Rate, veh/h	256	578	178	109	457	391	72	1031	72	237	742	41
Peak Hour Factor	0.90	0.90	0.90	0.92	0.92	0.92	0.97	0.97	0.97	0.97	0.97	0.97
Percent Heavy Veh, %	4	1	4	1	2	2	1	3	1	3	5	1
Cap, veh/h	279	821	252	236	429	366	300	1194	83	261	1398	77
Arrive On Green	0.13	0.31	0.30	0.06	0.24	0.23	0.03	0.38	0.37	0.10	0.44	0.43
Sat Flow, veh/h	1661	2643	812	1701	1780	1519	1701	3166	221	1674	3166	175
Grp Volume(v), veh/h	256	385	371	109	449	399	72	544	559	237	385	398
Grp Sat Flow(s),veh/h/ln	1661	1765	1690	1701	1751	1548	1701	1670	1717	1674	1643	1698
Q Serve(g_s), s	11.9	19.9	20.0	5.1	24.9	24.9	2.8	31.0	31.1	8.9	17.6	17.7
Cycle Q Clear(g_c), s	11.9	19.9	20.0	5.1	24.9	24.9	2.8	31.0	31.1	8.9	17.6	17.7
Prop In Lane	1.00		0.48	1.00		0.98	1.00		0.13	1.00		0.10
Lane Grp Cap(c), veh/h	279	548	525	236	422	373	300	630	647	261	725	749
V/C Ratio(X)	0.92	0.70	0.71	0.46	1.06	1.07	0.24	0.86	0.86	0.91	0.53	0.53
Avail Cap(c_a), veh/h	375	548	525	371	422	373	476	804	827	326	743	768
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	27.3	31.4	31.6	29.5	39.2	39.6	20.6	29.7	29.8	23.6	21.0	21.1
Incr Delay (d2), s/veh	19.5	3.4	3.7	0.5	62.0	65.6	0.2	8.1	7.9	21.9	0.7	0.7
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	6.1	8.8	8.6	2.1	17.8	16.2	1.1	13.3	13.7	4.9	6.6	6.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	46.9	34.8	35.3	30.0	101.1	105.1	20.8	37.8	37.7	45.5	21.8	21.8
LnGrp LOS	D	C	D	C	F	F	C	D	D	D	C	C
Approach Vol, veh/h		1012			957			1175			1020	
Approach Delay, s/veh		38.0			94.7			36.7			27.3	
Approach LOS		D			F			D			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.0	43.2	17.0	29.0	7.4	49.9	9.8	36.2
Change Period (Y+Rc), s	3.0	5.2	3.0	4.9	3.0	5.2	3.0	4.9
Max Green Setting (Gmax), s	15.0	48.8	20.0	24.1	15.0	45.8	15.0	22.1
Max Q Clear Time (g_c+I1), s	10.9	33.1	13.9	26.9	4.8	19.7	7.1	22.0
Green Ext Time (p_c), s	0.1	4.9	0.1	0.0	0.0	3.7	0.0	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	48.0
HCM 7th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	80	190	0	0	310	160	170	2310	140	0	0	0
Future Volume (veh/h)	80	190	0	0	310	160	170	2310	140	0	0	0
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0			
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		0.98	1.00		1.00			
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Work Zone On Approach		No			No			No				
Adj Sat Flow, veh/h/ln	1744	1702	0	0	1786	1772	1786	1772	1702			
Adj Flow Rate, veh/h	82	194	0	0	365	188	181	2457	149			
Peak Hour Factor	0.98	0.98	0.98	0.85	0.85	0.85	0.94	0.94	0.94			
Percent Heavy Veh, %	4	7	0	0	1	2	1	2	7			
Cap, veh/h	158	468	0	0	342	282	223	3021	181			
Arrive On Green	0.06	0.28	0.00	0.00	0.19	0.19	0.67	0.67	0.66			
Sat Flow, veh/h	1661	1702	0	0	1786	1474	332	4490	269			
Grp Volume(v), veh/h	82	194	0	0	365	188	958	874	955			
Grp Sat Flow(s),veh/h/ln	1661	1702	0	0	1786	1474	1755	1612	1723			
Q Serve(g_s), s	1.1	10.7	0.0	0.0	22.0	13.6	45.3	44.5	46.9			
Cycle Q Clear(g_c), s	1.1	10.7	0.0	0.0	22.0	13.6	45.3	44.5	46.9			
Prop In Lane	1.00		0.00	0.00		1.00	0.19		0.16			
Lane Grp Cap(c), veh/h	158	468	0	0	342	282	1181	1085	1159			
V/C Ratio(X)	0.52	0.41	0.00	0.00	1.07	0.67	0.81	0.81	0.82			
Avail Cap(c_a), veh/h	178	488	0	0	342	282	1181	1085	1159			
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Upstream Filter(I)	0.69	0.69	0.00	0.00	0.69	0.69	1.00	1.00	1.00			
Uniform Delay (d), s/veh	51.2	34.1	0.0	0.0	46.5	43.1	13.6	13.4	13.9			
Incr Delay (d2), s/veh	2.6	0.6	0.0	0.0	59.9	4.6	6.1	6.4	6.7			
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
%ile BackOfQ(50%),veh/ln	2.4	4.5	0.0	0.0	15.4	5.3	18.0	16.4	18.5			
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	53.7	34.7	0.0	0.0	106.4	47.7	19.7	19.8	20.6			
LnGrp LOS	D	C			F	D	B	B	C			
Approach Vol, veh/h		276			553			2787				
Approach Delay, s/veh		40.3			86.5			20.0				
Approach LOS		D			F			C				

Timer - Assigned Phs	2	3	4			8
Phs Duration (G+Y+Rc), s	80.4	9.6	25.0			34.6
Change Period (Y+Rc), s	5.0	5.0	5.0			5.0
Max Green Setting (Gmax), s	74.0	6.0	20.0			31.0
Max Q Clear Time (g_c+I1), s	48.9	3.1	24.0			12.7
Green Ext Time (p_c), s	10.9	0.1	0.0			1.0

Intersection Summary	
HCM 7th Control Delay, s/veh	31.8
HCM 7th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	90	100	310	270	150	190	170	1170	280	80	1550	50
Future Volume (veh/h)	90	100	310	270	150	190	170	1170	280	80	1550	50
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		0.99	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1786	1772	1786	1772	1772	1786	1786	1744	1730	1786	1786	1772
Adj Flow Rate, veh/h	112	125	388	321	179	226	177	1219	292	84	1632	53
Peak Hour Factor	0.80	0.80	0.80	0.84	0.84	0.84	0.96	0.96	0.96	0.95	0.95	0.95
Percent Heavy Veh, %	1	2	1	2	2	1	1	4	5	1	1	2
Cap, veh/h	134	499	461	256	345	413	147	1594	705	103	1516	49
Arrive On Green	0.08	0.21	0.21	0.15	0.28	0.28	0.09	0.48	0.48	0.06	0.45	0.45
Sat Flow, veh/h	1701	2374	1498	1688	1221	1462	1701	3313	1466	1701	3354	109
Grp Volume(v), veh/h	112	125	388	321	174	231	177	1219	292	84	823	862
Grp Sat Flow(s),veh/h/ln	1701	1187	1498	1688	1187	1496	1701	1657	1466	1701	1697	1766
Q Serve(g_s), s	9.8	6.6	31.6	22.8	18.5	19.8	13.0	45.4	19.4	7.3	68.0	68.0
Cycle Q Clear(g_c), s	9.8	6.6	31.6	22.8	18.5	19.8	13.0	45.4	19.4	7.3	68.0	68.0
Prop In Lane	1.00		1.00	1.00		0.98	1.00		1.00	1.00		0.06
Lane Grp Cap(c), veh/h	134	499	461	256	336	423	147	1594	705	103	767	798
V/C Ratio(X)	0.84	0.25	0.84	1.26	0.52	0.55	1.20	0.76	0.41	0.82	1.07	1.08
Avail Cap(c_a), veh/h	258	499	461	256	336	423	147	1594	705	113	767	798
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	68.4	49.6	48.8	63.9	45.4	46.1	68.7	32.0	25.3	69.9	41.3	41.3
Incr Delay (d2), s/veh	9.7	0.3	13.1	142.9	1.4	1.5	139.7	2.2	0.3	33.5	54.1	55.7
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.6	2.0	15.3	20.0	5.6	7.6	11.4	18.6	6.9	4.2	39.5	41.5
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	78.1	49.8	61.8	206.7	46.8	47.5	208.4	34.2	25.6	103.4	95.4	97.0
LnGrp LOS	E	D	E	F	D	D	F	C	C	F	F	F
Approach Vol, veh/h		625			726			1688			1769	
Approach Delay, s/veh		62.4			117.7			51.0			96.5	
Approach LOS		E			F			D			F	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	13.1	75.4	16.5	45.5	17.0	71.5	27.4	34.6
Change Period (Y+Rc), s	4.0	5.5	4.6	4.6	4.0	* 5.5	4.6	4.6
Max Green Setting (Gmax), s	10.0	68.5	22.8	30.0	13.0	* 66	22.8	30.0
Max Q Clear Time (g_c+I1), s	9.3	47.4	11.8	21.8	15.0	70.0	24.8	33.6
Green Ext Time (p_c), s	0.0	6.6	0.2	1.1	0.0	0.0	0.0	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	79.3
HCM 7th LOS	E

Notes

User approved pedestrian interval to be less than phase max green.

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	130	750	150	140	650	140	100	1220	80	110	990	50
Future Volume (veh/h)	130	750	150	140	650	140	100	1220	80	110	990	50
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.97	1.00		0.97	1.00		0.99	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1744	1758	1772	1786	1772	1786	1786	1758	1702	1758	1772	1646
Adj Flow Rate, veh/h	162	852	170	144	670	144	104	1271	83	117	1053	53
Peak Hour Factor	0.88	0.88	0.88	0.97	0.97	0.97	0.96	0.96	0.96	0.94	0.94	0.94
Percent Heavy Veh, %	4	3	2	1	2	1	1	3	7	3	2	11
Cap, veh/h	252	762	152	228	754	162	323	1489	97	256	1527	77
Arrive On Green	0.10	0.28	0.26	0.10	0.28	0.26	0.09	0.47	0.45	0.09	0.47	0.45
Sat Flow, veh/h	1661	2760	551	1701	2742	589	1701	3182	207	1674	3258	164
Grp Volume(v), veh/h	162	515	507	144	411	403	104	666	688	117	544	562
Grp Sat Flow(s),veh/h/ln	1661	1670	1641	1701	1683	1647	1701	1670	1719	1674	1683	1739
Q Serve(g_s), s	8.1	33.1	33.1	6.9	28.1	28.2	3.5	42.4	42.6	4.0	30.4	30.5
Cycle Q Clear(g_c), s	8.1	33.1	33.1	6.9	28.1	28.2	3.5	42.4	42.6	4.0	30.4	30.5
Prop In Lane	1.00		0.34	1.00		0.36	1.00		0.12	1.00		0.09
Lane Grp Cap(c), veh/h	252	461	453	228	463	453	323	782	805	256	789	815
V/C Ratio(X)	0.64	1.12	1.12	0.63	0.89	0.89	0.32	0.85	0.86	0.46	0.69	0.69
Avail Cap(c_a), veh/h	252	461	453	230	463	453	340	782	805	272	789	815
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.39	0.39	0.39	0.52	0.52	0.52	0.62	0.62	0.62
Uniform Delay (d), s/veh	30.1	43.4	43.8	30.2	41.7	42.1	17.3	28.2	28.4	23.1	25.0	25.1
Incr Delay (d2), s/veh	5.4	78.3	78.7	2.1	8.5	8.8	0.3	6.3	6.3	0.8	1.6	1.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.6	23.5	23.2	3.0	12.7	12.5	1.3	17.8	18.5	1.5	12.3	12.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	35.5	121.7	122.5	32.4	50.2	50.9	17.6	34.6	34.7	23.9	26.6	26.7
LnGrp LOS	D	F	F	C	D	D	B	C	C	C	C	C
Approach Vol, veh/h		1184			958			1458			1223	
Approach Delay, s/veh		110.2			47.8			33.4			26.4	
Approach LOS		F			D			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	12.8	58.2	14.0	35.0	12.8	58.2	13.9	35.1
Change Period (Y+Rc), s	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0
Max Green Setting (Gmax), s	9.0	52.0	9.0	30.0	9.0	52.0	9.0	30.0
Max Q Clear Time (g_c+I1), s	10.1	44.6	10.1	30.2	5.5	32.5	8.9	35.1
Green Ext Time (p_c), s	0.1	3.9	0.0	0.0	0.1	5.0	0.0	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	53.3
HCM 7th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	530	70	240	390	0	0	0	0	110	1370	110
Future Volume (veh/h)	0	530	70	240	390	0	0	0	0	110	1370	110
Initial Q (Qb), veh	0	0	0	0	0	0				0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00				1.04	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		1.00				1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Work Zone On Approach		No			No						No	
Adj Sat Flow, veh/h/ln	0	1772	1786	1786	1772	0				1857	1843	1843
Adj Flow Rate, veh/h	0	535	71	242	394	0				111	1384	111
Peak Hour Factor	0.99	0.99	0.99	0.99	0.99	0.99				0.99	0.99	0.99
Percent Heavy Veh, %	0	2	1	1	2	0				1	2	2
Cap, veh/h	0	747	99	333	1375	0				185	2311	752
Arrive On Green	0.00	0.25	0.26	0.11	0.41	0.00				0.48	0.48	0.49
Sat Flow, veh/h	0	3072	395	1701	3455	0				384	4793	1539
Grp Volume(v), veh/h	0	301	305	242	394	0				527	968	111
Grp Sat Flow(s),veh/h/ln	0	1683	1694	1701	1683	0				1824	1677	1539
Q Serve(g_s), s	0.0	15.5	15.6	9.8	7.4	0.0				20.0	20.0	3.8
Cycle Q Clear(g_c), s	0.0	15.5	15.6	9.8	7.4	0.0				20.0	20.0	3.8
Prop In Lane	0.00		0.23	1.00		0.00				0.21		1.00
Lane Grp Cap(c), veh/h	0	422	425	333	1375	0				879	1617	752
V/C Ratio(X)	0.00	0.71	0.72	0.73	0.29	0.00				0.60	0.60	0.15
Avail Cap(c_a), veh/h	0	422	425	333	1375	0				879	1617	752
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Upstream Filter(I)	0.00	1.00	1.00	0.29	0.29	0.00				1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	32.5	32.5	23.5	18.8	0.0				17.9	17.9	13.4
Incr Delay (d2), s/veh	0.0	9.9	10.0	2.2	0.2	0.0				3.0	1.6	0.4
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0				0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	7.3	7.4	4.0	2.9	0.0				8.6	7.6	1.4
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	0.0	42.4	42.5	25.8	19.0	0.0				20.9	19.6	13.8
LnGrp LOS		D	D	C	B					C	B	B
Approach Vol, veh/h		606			636						1606	
Approach Delay, s/veh		42.4			21.6						19.6	
Approach LOS		D			C						B	

Timer - Assigned Phs	2	3	4			8
Phs Duration (G+Y+Rc), s	51.0	15.0	29.0			44.0
Change Period (Y+Rc), s	4.6	4.0	4.6			4.6
Max Green Setting (Gmax), s	46.4	11.0	24.4			39.4
Max Q Clear Time (g_c+I1), s	22.0	11.8	17.6			9.4
Green Ext Time (p_c), s	0.5	0.0	0.1			0.2

Intersection Summary	
HCM 7th Control Delay, s/veh	24.9
HCM 7th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	210	790	250	60	580	100	220	330	40	160	440	160
Future Volume (veh/h)	210	790	250	60	580	100	220	330	40	160	440	160
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	0.99		0.96	1.00		0.97	1.00		0.99	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1772	1786	1772	1744	1800	1800	1772	1786	1716	1800	1786	1786
Adj Flow Rate, veh/h	226	849	269	64	617	106	227	340	41	172	473	172
Peak Hour Factor	0.93	0.93	0.93	0.94	0.94	0.94	0.97	0.97	0.97	0.93	0.93	0.93
Percent Heavy Veh, %	2	1	2	4	0	0	2	1	6	0	1	1
Cap, veh/h	337	889	281	186	898	154	321	817	98	427	597	216
Arrive On Green	0.11	0.35	0.35	0.06	0.31	0.30	0.12	0.31	0.31	0.09	0.29	0.28
Sat Flow, veh/h	1688	2507	793	1661	2903	497	1688	2610	313	1714	2085	754
Grp Volume(v), veh/h	226	574	544	64	363	360	227	155	226	172	270	375
Grp Sat Flow(s),veh/h/ln	1688	1697	1603	1661	1710	1690	1688	1197	1727	1714	1197	1642
Q Serve(g_s), s	7.8	28.8	28.9	2.3	16.3	16.4	8.3	8.9	9.1	6.3	18.2	18.4
Cycle Q Clear(g_c), s	7.8	28.8	28.9	2.3	16.3	16.4	8.3	8.9	9.1	6.3	18.2	18.4
Prop In Lane	1.00		0.49	1.00		0.29	1.00		0.18	1.00		0.46
Lane Grp Cap(c), veh/h	337	602	569	186	529	523	321	375	541	427	342	470
V/C Ratio(X)	0.67	0.95	0.96	0.34	0.69	0.69	0.71	0.41	0.42	0.40	0.79	0.80
Avail Cap(c_a), veh/h	467	602	569	389	607	600	629	425	613	786	425	583
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	19.8	27.5	27.7	22.8	26.4	26.6	21.7	23.7	23.8	20.4	28.8	29.0
Incr Delay (d2), s/veh	2.3	25.8	27.2	1.1	3.2	3.3	2.9	1.0	0.7	0.6	9.0	7.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.1	15.4	14.9	0.9	6.9	6.9	3.4	2.6	3.7	2.5	5.9	8.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	22.1	53.3	54.9	23.9	29.7	29.9	24.6	24.7	24.5	21.1	37.7	36.0
LnGrp LOS	C	D	D	C	C	C	C	C	C	C	D	D
Approach Vol, veh/h		1344			787			608			817	
Approach Delay, s/veh		48.7			29.3			24.6			33.4	
Approach LOS		D			C			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	11.7	31.3	13.3	31.0	14.1	29.0	9.3	35.0
Change Period (Y+Rc), s	3.0	4.6	3.0	4.6	3.0	4.6	3.0	4.6
Max Green Setting (Gmax), s	27.0	30.4	17.0	30.4	27.0	30.4	17.0	30.4
Max Q Clear Time (g_c+I1), s	18.3	11.1	9.8	18.4	10.3	20.4	4.3	30.9
Green Ext Time (p_c), s	0.6	2.2	0.5	3.7	0.8	3.0	0.1	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	36.8
HCM 7th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	60	580	150	220	490	240	170	250	140	390	470	40
Future Volume (veh/h)	60	580	150	220	490	240	170	250	140	390	470	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		0.98	0.99		0.98	0.99		0.99
Parking Bus, Adj	1.00	1.00	0.99	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1772	1786	1800	1772	1800	1786	1772	1786	1716	1800	1800	1800
Adj Flow Rate, veh/h	63	611	158	232	516	253	191	281	157	411	495	42
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.89	0.89	0.89	0.95	0.95	0.95
Percent Heavy Veh, %	2	1	0	2	0	1	2	1	6	0	0	0
Cap, veh/h	317	759	196	300	1146	500	409	507	274	500	1059	90
Arrive On Green	0.06	0.29	0.28	0.11	0.34	0.34	0.10	0.24	0.23	0.19	0.33	0.32
Sat Flow, veh/h	1688	2657	686	1688	3420	1490	1688	2109	1141	1714	3187	270
Grp Volume(v), veh/h	63	390	379	232	516	253	191	224	214	411	265	272
Grp Sat Flow(s),veh/h/ln	1688	1697	1646	1688	1710	1490	1688	1697	1554	1714	1710	1747
Q Serve(g_s), s	2.4	19.7	19.8	8.9	10.9	12.5	8.0	10.7	11.2	16.5	11.3	11.4
Cycle Q Clear(g_c), s	2.4	19.7	19.8	8.9	10.9	12.5	8.0	10.7	11.2	16.5	11.3	11.4
Prop In Lane	1.00		0.42	1.00		1.00	1.00		0.73	1.00		0.15
Lane Grp Cap(c), veh/h	317	484	470	300	1146	500	409	408	374	500	568	580
V/C Ratio(X)	0.20	0.80	0.81	0.77	0.45	0.51	0.47	0.55	0.57	0.82	0.47	0.47
Avail Cap(c_a), veh/h	510	588	571	408	1186	517	570	662	606	509	667	682
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	22.0	30.6	30.8	22.8	24.0	24.6	24.0	30.7	31.1	21.1	24.3	24.4
Incr Delay (d2), s/veh	0.1	7.5	7.9	4.1	0.4	1.1	0.3	1.6	2.0	9.6	0.8	0.8
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.9	8.8	8.7	3.7	4.4	4.5	3.2	4.5	4.3	7.6	4.6	4.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	22.1	38.1	38.6	26.9	24.4	25.7	24.3	32.3	33.1	30.7	25.2	25.3
LnGrp LOS	C	D	D	C	C	C	C	C	C	C	C	C
Approach Vol, veh/h		832			1001			629			948	
Approach Delay, s/veh		37.1			25.3			30.1			27.6	
Approach LOS		D			C			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	21.5	26.3	9.4	35.0	13.2	34.7	14.1	30.3
Change Period (Y+Rc), s	3.0	* 4.8	3.0	* 4.7	3.0	4.8	3.0	4.7
Max Green Setting (Gmax), s	18.5	* 35	17.0	* 31	19.0	35.2	17.0	31.3
Max Q Clear Time (g_c+I1), s	18.5	13.2	4.4	14.5	10.0	13.4	10.9	21.8
Green Ext Time (p_c), s	0.1	2.7	0.1	4.9	0.3	3.3	0.3	3.4

Intersection Summary	
HCM 7th Control Delay, s/veh	29.7
HCM 7th LOS	C

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	160	700	20	30	470	210	10	50	20	240	80	80
Future Volume (veh/h)	160	700	20	30	470	210	10	50	20	240	80	80
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.04	1.04	1.04	1.04	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		0.97	0.99		0.99	0.99		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1730	1744	1800	1800	1772	1786	1872	1784	1711	1843	1872	1814
Adj Flow Rate, veh/h	163	714	20	35	547	244	15	76	30	312	104	104
Peak Hour Factor	0.98	0.98	0.98	0.86	0.86	0.86	0.66	0.66	0.66	0.77	0.77	0.77
Percent Heavy Veh, %	5	4	0	0	2	1	0	6	11	2	0	4
Cap, veh/h	267	959	27	326	613	273	288	332	131	374	233	233
Arrive On Green	0.07	0.57	0.56	0.04	0.53	0.53	0.27	0.27	0.27	0.27	0.27	0.27
Sat Flow, veh/h	1647	1687	47	1714	1147	512	1233	1212	479	1327	853	853
Grp Volume(v), veh/h	163	0	734	35	0	791	15	0	106	312	0	208
Grp Sat Flow(s),veh/h/ln	1647	0	1735	1714	0	1658	1233	0	1691	1327	0	1705
Q Serve(g_s), s	3.9	0.0	30.1	0.8	0.0	40.4	1.0	0.0	4.6	21.4	0.0	9.6
Cycle Q Clear(g_c), s	3.9	0.0	30.1	0.8	0.0	40.4	10.6	0.0	4.6	26.0	0.0	9.6
Prop In Lane	1.00		0.03	1.00		0.31	1.00		0.28	1.00		0.50
Lane Grp Cap(c), veh/h	267	0	986	326	0	887	288	0	463	374	0	467
V/C Ratio(X)	0.61	0.00	0.74	0.11	0.00	0.89	0.05	0.00	0.23	0.83	0.00	0.45
Avail Cap(c_a), veh/h	437	0	986	560	0	887	288	0	463	374	0	467
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	0.81	0.00	0.81
Uniform Delay (d), s/veh	19.6	0.0	15.4	12.9	0.0	19.8	32.9	0.0	26.8	37.3	0.0	28.7
Incr Delay (d2), s/veh	2.2	0.0	5.1	0.1	0.0	13.2	0.1	0.0	0.2	12.3	0.0	0.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.1	0.0	12.2	0.3	0.0	17.5	0.3	0.0	1.9	8.5	0.0	3.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	21.8	0.0	20.5	13.0	0.0	33.0	33.0	0.0	27.1	49.6	0.0	29.2
LnGrp LOS	C		C	B		C	C		C	D		C
Approach Vol, veh/h		897			826			121			520	
Approach Delay, s/veh		20.7			32.1			27.8			41.5	
Approach LOS		C			C			C			D	

Timer - Assigned Phs	2	3	4	6	7	8
Phs Duration (G+Y+Rc), s	30.0	10.2	54.8	30.0	7.0	58.0
Change Period (Y+Rc), s	4.6	4.0	4.6	4.6	4.0	4.6
Max Green Setting (Gmax), s	25.4	16.0	40.4	25.4	16.0	40.4
Max Q Clear Time (g_c+I1), s	12.6	5.9	42.4	28.0	2.8	32.1
Green Ext Time (p_c), s	0.3	0.4	0.0	0.0	0.0	2.4

Intersection Summary	
HCM 7th Control Delay, s/veh	29.6
HCM 7th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	777	106	0	0	0	0	0	0	235	1324	0
Future Volume (veh/h)	0	777	106	0	0	0	0	0	0	235	1324	0
Initial Q (Qb), veh	0	0	0							0	0	0
Lane Width Adj.	1.00	1.00	1.00							1.04	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.99							1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00							1.00	1.00	1.00
Work Zone On Approach		No									No	
Adj Sat Flow, veh/h/ln	0	1595	1595							1619	1557	0
Adj Flow Rate, veh/h	0	785	107							250	1409	0
Peak Hour Factor	0.99	0.99	0.99							0.94	0.94	0.94
Percent Heavy Veh, %	0	2	2							5	5	0
Cap, veh/h	0	1597	216							427	2408	0
Arrive On Green	0.00	0.41	0.41							0.51	0.51	0.00
Sat Flow, veh/h	0	4015	524							833	4916	0
Grp Volume(v), veh/h	0	587	305							455	1204	0
Grp Sat Flow(s),veh/h/ln	0	1451	1493							1515	1339	0
Q Serve(g_s), s	0.0	11.9	12.1							16.7	16.7	0.0
Cycle Q Clear(g_c), s	0.0	11.9	12.1							16.7	16.7	0.0
Prop In Lane	0.00		0.35							0.55		0.00
Lane Grp Cap(c), veh/h	0	1197	616							777	2059	0
V/C Ratio(X)	0.00	0.49	0.50							0.59	0.59	0.00
Avail Cap(c_a), veh/h	0	1197	616							777	2059	0
HCM Platoon Ratio	1.00	1.00	1.00							1.00	1.00	1.00
Upstream Filter(I)	0.00	0.98	0.98							0.76	0.76	0.00
Uniform Delay (d), s/veh	0.0	17.3	17.4							13.6	13.6	0.0
Incr Delay (d2), s/veh	0.0	1.4	2.8							2.5	0.9	0.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0							0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	4.0	4.4							5.7	4.7	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	0.0	18.7	20.2							16.0	14.5	0.0
LnGrp LOS		B	C							B	B	
Approach Vol, veh/h		892									1659	
Approach Delay, s/veh		19.2									14.9	
Approach LOS		B									B	

Timer - Assigned Phs	2	4
Phs Duration (G+Y+Rc), s	44.0	36.0
Change Period (Y+Rc), s	4.6	4.6
Max Green Setting (Gmax), s	39.4	31.4
Max Q Clear Time (g_c+I1), s	18.7	14.1
Green Ext Time (p_c), s	0.8	0.4

Intersection Summary	
HCM 7th Control Delay, s/veh	16.4
HCM 7th LOS	B



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	50	870	190	200	810	140	120	120	200	260	250	70
Future Volume (veh/h)	50	870	190	200	810	140	120	120	200	260	250	70
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		1.00	1.00		0.99	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1716	1758	1800	1786	1772	1688	1660	1716	1786	1758	1744	1772
Adj Flow Rate, veh/h	56	967	211	208	844	146	126	126	211	292	281	79
Peak Hour Factor	0.90	0.90	0.90	0.96	0.96	0.96	0.95	0.95	0.95	0.89	0.89	0.89
Percent Heavy Veh, %	6	3	0	1	2	8	10	6	1	3	4	2
Cap, veh/h	243	1201	262	238	1396	242	153	153	247	338	325	91
Arrive On Green	0.03	0.44	0.44	0.08	0.49	0.48	0.18	0.18	0.18	0.23	0.23	0.22
Sat Flow, veh/h	1634	2724	593	1701	2867	496	865	863	1397	1495	1438	404
Grp Volume(v), veh/h	56	592	586	208	496	494	244	0	219	326	0	326
Grp Sat Flow(s),veh/h/ln	1634	1670	1647	1701	1683	1680	1673	0	1453	1669	0	1668
Q Serve(g_s), s	3.1	50.1	50.3	10.9	34.9	34.9	22.9	0.0	23.9	30.6	0.0	30.6
Cycle Q Clear(g_c), s	3.1	50.1	50.3	10.9	34.9	34.9	22.9	0.0	23.9	30.6	0.0	30.6
Prop In Lane	1.00		0.36	1.00		0.30	0.52		0.96	0.90		0.24
Lane Grp Cap(c), veh/h	243	736	726	238	820	818	296	0	257	378	0	377
V/C Ratio(X)	0.23	0.80	0.81	0.87	0.60	0.60	0.82	0.00	0.85	0.86	0.00	0.86
Avail Cap(c_a), veh/h	358	736	726	279	820	818	427	0	371	532	0	532
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.81	0.81	0.81	1.00	1.00	1.00	1.00	0.00	1.00	0.96	0.00	0.96
Uniform Delay (d), s/veh	26.9	39.5	39.7	34.4	30.4	30.5	64.6	0.0	65.0	60.6	0.0	60.7
Incr Delay (d2), s/veh	0.1	5.6	5.7	20.5	3.3	3.3	7.3	0.0	11.0	9.8	0.0	9.8
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.2	21.5	21.4	5.7	14.9	14.9	10.4	0.0	9.7	14.1	0.0	14.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	27.0	45.0	45.4	54.9	33.7	33.8	71.9	0.0	76.1	70.5	0.0	70.5
LnGrp LOS	C	D	D	D	C	C	E		E	E		E
Approach Vol, veh/h		1234			1198			463			652	
Approach Delay, s/veh		44.4			37.4			73.9			70.5	
Approach LOS		D			D			E			E	

Timer - Assigned Phs	2	3	4		6	7	8
Phs Duration (G+Y+Rc), s	32.2	8.5	82.4		39.9	16.0	74.9
Change Period (Y+Rc), s	5.0	3.0	4.9		4.6	3.0	4.9
Max Green Setting (Gmax), s	40.0	17.0	38.1		50.4	17.0	38.1
Max Q Clear Time (g_c+I1), s	25.9	5.1	36.9		32.6	12.9	52.3
Green Ext Time (p_c), s	1.4	0.1	0.7		2.6	0.2	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	50.7
HCM 7th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	70	770	140	90	800	210	190	200	100	250	90	70
Future Volume (veh/h)	70	770	140	90	800	210	190	200	100	250	90	70
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1744	1772	1744	1716	1786	1786	1772	1758	1702	1744	1758	1786
Adj Flow Rate, veh/h	71	786	143	102	909	0	235	247	123	305	110	85
Peak Hour Factor	0.98	0.98	0.98	0.88	0.88	0.88	0.81	0.81	0.81	0.82	0.82	0.82
Percent Heavy Veh, %	4	2	4	6	1	1	2	3	7	4	3	1
Cap, veh/h	164	977	427	199	1035		301	732	353	265	743	529
Arrive On Green	0.04	0.29	0.29	0.06	0.30	0.00	0.09	0.34	0.34	0.16	0.40	0.40
Sat Flow, veh/h	1661	3367	1472	1634	3393	1514	3274	2184	1053	1661	1862	1325
Grp Volume(v), veh/h	71	786	143	102	909	0	235	187	183	305	98	97
Grp Sat Flow(s),veh/h/ln	1661	1683	1472	1634	1697	1514	1637	1670	1566	1661	1670	1517
Q Serve(g_s), s	3.6	26.4	9.3	5.3	31.1	0.0	8.6	10.2	10.8	19.5	4.6	5.0
Cycle Q Clear(g_c), s	3.6	26.4	9.3	5.3	31.1	0.0	8.6	10.2	10.8	19.5	4.6	5.0
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.67	1.00		0.87
Lane Grp Cap(c), veh/h	164	977	427	199	1035		301	560	525	265	666	605
V/C Ratio(X)	0.43	0.80	0.33	0.51	0.88		0.78	0.33	0.35	1.15	0.15	0.16
Avail Cap(c_a), veh/h	307	1093	478	450	1185		670	560	525	265	666	605
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	32.2	40.2	34.1	31.0	40.3	0.0	54.3	30.4	30.6	51.4	23.5	23.6
Incr Delay (d2), s/veh	1.8	4.1	0.5	2.0	7.1	0.0	4.4	1.6	1.8	102.4	0.5	0.6
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.5	11.3	3.4	2.2	13.7	0.0	3.7	4.4	4.3	15.6	1.9	1.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	34.0	44.2	34.6	33.1	47.4	0.0	58.7	32.0	32.4	153.8	23.9	24.2
LnGrp LOS	C	D	C	C	D		E	C	C	F	C	C
Approach Vol, veh/h		1000			1011			605			500	
Approach Delay, s/veh		42.1			45.9			42.5			103.2	
Approach LOS		D			D			D			F	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	11.3	40.8	24.0	46.2	9.5	42.6	16.2	54.0
Change Period (Y+Rc), s	4.0	5.3	4.5	5.2	4.0	5.3	5.0	* 5.2
Max Green Setting (Gmax), s	26.0	39.7	19.5	41.0	16.0	42.7	25.0	* 35
Max Q Clear Time (g_c+I1), s	7.3	28.4	21.5	12.8	5.6	33.1	10.6	7.0
Green Ext Time (p_c), s	0.2	4.4	0.0	2.3	0.1	4.2	0.7	1.1

Intersection Summary	
HCM 7th Control Delay, s/veh	53.2
HCM 7th LOS	D

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.
Unsignalized Delay for [WBR] is excluded from calculations of the approach delay and intersection delay.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	280	260	50	330	120	270	70	690	170	210	790	20
Future Volume (veh/h)	280	260	50	330	120	270	70	690	170	210	790	20
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.04	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.99	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.99
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1786	1772	1786	1772	1786	1857	1772	1772	1772	1772	1772	1786
Adj Flow Rate, veh/h	219	418	0	240	284	0	75	742	183	216	814	21
Peak Hour Factor	0.90	0.90	0.90	0.94	0.94	0.94	0.93	0.93	0.93	0.97	0.97	0.97
Percent Heavy Veh, %	1	2	1	2	1	1	2	2	2	2	2	1
Cap, veh/h	293	611		329	348		111	1070	473	208	1252	32
Arrive On Green	0.17	0.17	0.00	0.19	0.19	0.00	0.07	0.32	0.32	0.12	0.38	0.36
Sat Flow, veh/h	1701	3544	0	1688	1786	1574	1688	3367	1490	1688	3339	86
Grp Volume(v), veh/h	219	418	0	240	284	0	75	742	183	216	410	425
Grp Sat Flow(s),veh/h/ln	1701	1772	0	1688	1786	1574	1688	1683	1490	1688	1683	1742
Q Serve(g_s), s	11.1	10.0	0.0	12.1	13.8	0.0	3.9	17.5	8.7	11.2	18.3	18.3
Cycle Q Clear(g_c), s	11.1	10.0	0.0	12.1	13.8	0.0	3.9	17.5	8.7	11.2	18.3	18.3
Prop In Lane	1.00		0.00	1.00		1.00	1.00		1.00	1.00		0.05
Lane Grp Cap(c), veh/h	293	611		329	348		111	1070	473	208	631	653
V/C Ratio(X)	0.75	0.68		0.73	0.82		0.67	0.69	0.39	1.04	0.65	0.65
Avail Cap(c_a), veh/h	444	925		440	466		208	1631	722	208	816	844
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	35.7	35.3	0.0	34.3	35.0	0.0	41.5	27.1	24.1	39.8	23.5	23.5
Incr Delay (d2), s/veh	1.4	0.5	0.0	2.4	6.0	0.0	2.6	1.4	0.9	72.6	2.0	1.9
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.6	4.3	0.0	5.1	6.5	0.0	1.7	6.7	3.0	8.6	7.0	7.2
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	37.1	35.8	0.0	36.7	41.0	0.0	44.1	28.5	25.0	112.4	25.4	25.4
LnGrp LOS	D	D		D	D		D	C	C	F	C	C
Approach Vol, veh/h		637			524			1000			1051	
Approach Delay, s/veh		36.2			39.0			29.0			43.3	
Approach LOS		D			D			C			D	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	16.0	32.8		22.0	10.8	38.1		20.0				
Change Period (Y+Rc), s	4.0	5.7		4.9	4.0	5.7		4.9				
Max Green Setting (Gmax), s	12.0	42.3		23.1	12.0	42.3		23.1				
Max Q Clear Time (g_c+I1), s	13.3	19.5		15.8	5.9	20.3		13.1				
Green Ext Time (p_c), s	0.0	7.6		0.8	0.0	6.3		1.3				

Intersection Summary	
HCM 7th Control Delay, s/veh	36.8
HCM 7th LOS	D

Notes

User approved volume balancing among the lanes for turning movement.

Unsignalized Delay for [EBR, WBR] is excluded from calculations of the approach delay and intersection delay.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	70	1950	90	190	1680	320	210	120	220	210	30	50
Future Volume (veh/h)	70	1950	90	190	1680	320	210	120	220	210	30	50
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1856	1856	1811	1870	1856	1885	1885	1841	1856	1841	1885
Adj Flow Rate, veh/h	74	2074	0	200	1768	0	256	146	0	226	32	54
Peak Hour Factor	0.94	0.94	0.94	0.95	0.95	0.95	0.82	0.82	0.82	0.93	0.93	0.93
Percent Heavy Veh, %	2	3	3	6	2	3	1	1	4	3	4	1
Cap, veh/h	129	1450		282	1503		345	207		263	98	166
Arrive On Green	0.07	0.41	0.00	0.08	0.42	0.00	0.10	0.11	0.00	0.15	0.16	0.16
Sat Flow, veh/h	1781	3526	1572	3346	3554	1572	3483	1885	1560	1767	615	1037
Grp Volume(v), veh/h	74	2074	0	200	1768	0	256	146	0	226	0	86
Grp Sat Flow(s),veh/h/ln	1781	1763	1572	1673	1777	1572	1742	1885	1560	1767	0	1652
Q Serve(g_s), s	3.8	38.8	0.0	5.5	39.9	0.0	6.7	7.1	0.0	11.8	0.0	4.4
Cycle Q Clear(g_c), s	3.8	38.8	0.0	5.5	39.9	0.0	6.7	7.1	0.0	11.8	0.0	4.4
Prop In Lane	1.00		1.00	1.00		1.00	1.00		1.00	1.00		0.63
Lane Grp Cap(c), veh/h	129	1450		282	1503		345	207		263	0	264
V/C Ratio(X)	0.57	1.43		0.71	1.18		0.74	0.70		0.86	0.00	0.33
Avail Cap(c_a), veh/h	368	1450		691	1503		720	479		365	0	420
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	42.3	27.8	0.0	42.1	27.2	0.0	41.3	40.5	0.0	39.2	0.0	35.1
Incr Delay (d2), s/veh	3.9	197.9	0.0	3.3	86.7	0.0	3.2	4.3	0.0	13.8	0.0	0.7
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.7	54.4	0.0	2.3	33.1	0.0	2.9	3.4	0.0	5.9	0.0	1.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	46.3	225.7	0.0	45.3	113.9	0.0	44.5	44.9	0.0	53.0	0.0	35.9
LnGrp LOS	D	F		D	F		D	D		D		D
Approach Vol, veh/h		2148			1968			402			312	
Approach Delay, s/veh		219.5			107.0			44.6			48.3	
Approach LOS		F			F			D			D	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	9.5	16.4	12.4	46.1	14.8	21.1	13.5	45.0
Change Period (Y+Rc), s	5.5	6.0	5.5	* 6.2	5.5	6.0	5.5	* 6.2
Max Green Setting (Gmax), s	4.0	24.0	19.5	* 39	19.5	24.0	19.5	* 39
Max Q Clear Time (g_c+I1), s	3.8	9.1	5.8	41.9	8.7	6.4	7.5	40.8
Green Ext Time (p_c), s	0.3	0.5	0.1	0.0	0.6	0.3	0.5	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	148.0
HCM 7th LOS	F

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.

Unsignalized Delay for [NBR, EBR, WBR] is excluded from calculations of the approach delay and intersection delay.

Intersection	
Int Delay, s/veh	48

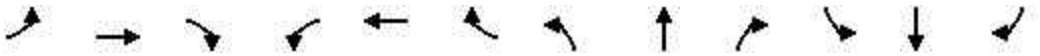
Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	600	0	470	310	0	540
Future Vol, veh/h	600	0	470	310	0	540
Conflicting Peds, #/hr	0	1	1	0	2	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	75	-	-	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	86	86	92	92	96	96
Heavy Vehicles, %	1	1	1	2	1	1
Mvmt Flow	698	0	511	337	0	563

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	-	699	0	-	699
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	-	4.11	-	-	6.21
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	-	2.209	-	-	3.309
Pot Cap-1 Maneuver	-	0	903	-	0	~ 442
Stage 1	-	0	-	-	0	-
Stage 2	-	0	-	-	0	-
Platoon blocked, %	-			-		
Mov Cap-1 Maneuver	-	-	902	-	-	~ 441
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	EB	WB	NB
HCM Control Delay, s/v	0	8.48	167
HCM LOS			F

Minor Lane/Major Mvmt	NBLn1	EBT	WBL	WBT
Capacity (veh/h)	441	-	902	-
HCM Lane V/C Ratio	1.274	-	0.567	-
HCM Control Delay (s/veh)	167	-	14.1	-
HCM Lane LOS	F	-	B	-
HCM 95th %tile Q(veh)	23.9	-	3.6	-

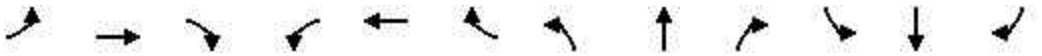
Notes			
~: Volume exceeds capacity	$: Delay exceeds 300s	+: Computation Not Defined	*: All major volume in platoon



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	0	580	120	530	680	0	0	0	0	120	340	60
Future Volume (vph)	0	580	120	530	680	0	0	0	0	120	340	60
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	12	12	12	12	12	12	12	12	12	14	14	14
Total Lost time (s)		4.0		3.5	4.0						4.0	
Lane Util. Factor		0.95		1.00	0.95						0.95	
Frpb, ped/bikes		1.00		1.00	1.00						1.00	
Flpb, ped/bikes		1.00		1.00	1.00						1.00	
Frt		0.97		1.00	1.00						0.98	
Flt Protected		1.00		0.95	1.00						0.99	
Satd. Flow (prot)		3239		1583	3294						3347	
Flt Permitted		1.00		0.15	1.00						0.99	
Satd. Flow (perm)		3239		256	3294						3347	
Peak-hour factor, PHF	0.90	0.90	0.90	0.93	0.93	0.93	0.92	0.92	0.92	0.88	0.88	0.88
Adj. Flow (vph)	0	644	133	570	731	0	0	0	0	136	386	68
RTOR Reduction (vph)	0	20	0	0	0	0	0	0	0	0	11	0
Lane Group Flow (vph)	0	757	0	570	731	0	0	0	0	0	579	0
Confl. Peds. (#/hr)	12		6	6		12	7					7
Heavy Vehicles (%)	0%	2%	5%	8%	3%	0%	0%	0%	0%	7%	6%	1%
Bus Blockages (#/hr)	0	0	4	0	4	0	0	0	0	0	0	2
Turn Type		NA		pm+pt	NA					Perm	NA	
Protected Phases		8		7	4						2	
Permitted Phases				4						2		
Actuated Green, G (s)		21.4		46.9	46.4						34.1	
Effective Green, g (s)		22.0		47.5	47.0						35.0	
Actuated g/C Ratio		0.24		0.53	0.52						0.39	
Clearance Time (s)		4.6		4.1	4.6						4.9	
Lane Grp Cap (vph)		791		452	1720						1301	
v/s Ratio Prot		0.23		c0.30	0.22							
v/s Ratio Perm				c0.36							0.17	
v/c Ratio		0.96		1.26	0.43						0.45	
Uniform Delay, d1		33.5		28.7	13.2						20.3	
Progression Factor		1.00		1.00	1.00						1.00	
Incremental Delay, d2		23.2		134.3	0.8						1.1	
Delay (s)		56.7		163.0	14.0						21.4	
Level of Service		E		F	B						C	
Approach Delay (s/veh)		56.7			79.3			0.0			21.4	
Approach LOS		E			E			A			C	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	59.9	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	0.93		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	11.5
Intersection Capacity Utilization	80.4%	ICU Level of Service	D
Analysis Period (min)	15		
Description: date collected 3/21/2019			

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	330	680	220	120	710	180	350	920	110	140	820	250
Future Volume (vph)	330	680	220	120	710	180	350	920	110	140	820	250
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	11	12	12	11	12	13	11	11	12	11	11	12
Total Lost time (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0
Lane Util. Factor	0.97	0.95	1.00	0.97	0.95	1.00	1.00	0.91	1.00	1.00	0.91	1.00
Frpb, ped/bikes	1.00	1.00	0.97	1.00	1.00	0.98	1.00	1.00	0.98	1.00	1.00	0.98
Flpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	3144	3320	1444	3113	3386	1532	1653	4657	1463	1637	4568	1503
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	3144	3320	1444	3113	3386	1532	1653	4657	1463	1637	4568	1503
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	347	716	232	126	747	189	368	968	116	147	863	263
RTOR Reduction (vph)	0	0	77	0	0	138	0	0	67	0	0	187
Lane Group Flow (vph)	347	716	155	126	747	51	368	968	49	147	863	76
Confl. Peds. (#/hr)	7		12	12		7	4		9	9		4
Heavy Vehicles (%)	2%	3%	3%	3%	1%	1%	0%	2%	2%	1%	4%	0%
Turn Type	Prot	NA	Perm	Prot	NA	Perm	Prot	NA	Perm	Prot	NA	Perm
Protected Phases	3	8		7	4		5	2		1	6	
Permitted Phases			8			4			2			6
Actuated Green, G (s)	21.8	49.0	49.0	11.1	38.5	38.5	38.8	67.6	67.6	17.1	45.9	45.9
Effective Green, g (s)	23.8	51.2	51.2	13.1	40.5	40.5	40.8	69.6	69.6	19.1	47.9	47.9
Actuated g/C Ratio	0.14	0.31	0.31	0.08	0.25	0.25	0.25	0.42	0.42	0.12	0.29	0.29
Clearance Time (s)	5.0	5.2	5.2	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0
Vehicle Extension (s)	2.0	3.0	3.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	3.0	3.0
Lane Grp Cap (vph)	453	1030	448	247	831	376	408	1964	617	189	1326	436
v/s Ratio Prot	c0.11	0.22		0.04	c0.22		c0.22	0.21		0.09	c0.19	
v/s Ratio Perm			0.11			0.03			0.03			0.05
v/c Ratio	0.77	0.70	0.35	0.51	0.90	0.14	0.90	0.49	0.08	0.78	0.65	0.18
Uniform Delay, d1	67.9	50.0	44.0	72.9	60.3	48.6	60.2	34.8	28.5	70.9	51.2	43.8
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	6.8	2.1	0.5	0.7	12.2	0.1	22.2	0.9	0.3	16.6	2.5	0.9
Delay (s)	74.8	52.1	44.4	73.6	72.5	48.6	82.3	35.7	28.8	87.5	53.7	44.7
Level of Service	E	D	D	E	E	D	F	D	C	F	D	D
Approach Delay (s/veh)		56.8			68.4			47.0			55.7	
Approach LOS		E			E			D			E	

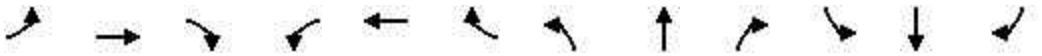
Intersection Summary			
HCM 2000 Control Delay (s/veh)	56.1	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	0.80		
Actuated Cycle Length (s)	165.0	Sum of lost time (s)	12.0
Intersection Capacity Utilization	94.1%	ICU Level of Service	F
Analysis Period (min)	15		
Description: date collected 12/12/2023			

c Critical Lane Group



Movement	WBL	WBR	WBR2	NBL	NBT	NBR	SBL	SBT	SBR	SEL2	SEL	SER
Lane Configurations												
Traffic Volume (vph)	220	680	710	220	800	240	0	0	0	60	710	640
Future Volume (vph)	220	680	710	220	800	240	0	0	0	60	710	640
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	12	12	13	12	12	12	12	12	12	12	12	13
Total Lost time (s)	3.0	3.0	3.0		3.0	3.0				3.0	3.0	2.6
Lane Util. Factor	1.00	0.88	1.00		0.95	1.00				1.00	0.97	1.00
Frpb, ped/bikes	1.00	1.00	0.98		1.00	1.00				1.00	1.00	1.00
Flpb, ped/bikes	1.00	1.00	1.00		1.00	1.00				1.00	1.00	1.00
Frt	1.00	0.85	0.85		1.00	0.85				1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00		0.99	1.00				0.95	0.95	1.00
Satd. Flow (prot)	1629	2554	1470		3291	1500				1629	3147	1487
Flt Permitted	0.95	1.00	1.00		0.99	1.00				0.95	0.95	1.00
Satd. Flow (perm)	1629	2554	1470		3291	1500				1629	3147	1487
Peak-hour factor, PHF	0.96	0.96	0.96	0.94	0.94	0.94	0.92	0.92	0.92	0.93	0.93	0.93
Adj. Flow (vph)	229	708	740	234	851	255	0	0	0	65	763	688
RTOR Reduction (vph)	0	0	298	0	0	151	0	0	0	0	0	30
Lane Group Flow (vph)	229	708	442	0	1085	104	0	0	0	65	763	658
Confl. Peds. (#/hr)	11		10	2					2	10		11
Heavy Vehicles (%)	5%	5%	5%	2%	2%	2%	2%	2%	2%	5%	5%	5%
Bus Blockages (#/hr)	0	2	0	0	4	0	0	0	0	0	2	2
Turn Type	Prot	Prot	Perm	Split	NA	Perm				Prot	Prot	pt+ov
Protected Phases	7	6		8	8					5	5 6	6 8
Permitted Phases			6			8						5 6
Actuated Green, G (s)	10.8	23.8	23.8		31.3	31.3				10.4	38.4	70.1
Effective Green, g (s)	12.0	25.0	25.0		32.9	32.9				12.0	37.4	70.3
Actuated g/C Ratio	0.13	0.27	0.27		0.35	0.35				0.13	0.40	0.75
Clearance Time (s)	4.2	4.2	4.2		4.6	4.6				4.6		
Vehicle Extension (s)	2.0	3.5	3.5		2.5	2.5				2.0		
Lane Grp Cap (vph)	208	679	391		1153	525				208	1253	1154
v/s Ratio Prot	c0.14	0.28			c0.33					0.04	0.24	c0.35
v/s Ratio Perm			c0.30			0.07						0.09
v/c Ratio	1.10	1.04	1.13		0.94	0.20				0.31	0.61	0.57
Uniform Delay, d1	41.0	34.5	34.5		29.6	21.3				37.2	22.4	5.2
Progression Factor	1.00	1.00	1.00		1.00	1.00				0.83	0.76	1.10
Incremental Delay, d2	92.0	46.2	86.0		14.5	0.1				0.3	0.5	0.6
Delay (s)	133.0	80.6	120.5		44.1	21.4				31.2	17.5	6.3
Level of Service	F	F	F		D	C				C	B	A
Approach Delay (s/veh)	105.4				39.8			0.0			13.0	
Approach LOS	F				D			A			B	

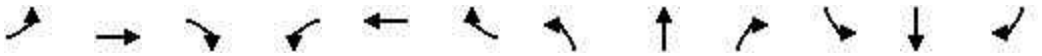
Intersection Summary			
HCM 2000 Control Delay (s/veh)	55.1	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	1.17		
Actuated Cycle Length (s)	93.9	Sum of lost time (s)	24.8
Intersection Capacity Utilization	84.2%	ICU Level of Service	E
Analysis Period (min)	15		
Description: date collected 10/5/2022			
c Critical Lane Group			



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	0	560	0	0	390	390	90	2250	10	0	0	0
Future Volume (vph)	0	560	0	0	390	390	90	2250	10	0	0	0
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	12	12	12	12	11	11	11	11	11	12	12	12
Total Lost time (s)		3.5			3.5		3.5	3.5				
Lane Util. Factor		0.95			0.95		1.00	0.91				
Frpb, ped/bikes		1.00			0.99		1.00	1.00				
Flpb, ped/bikes		1.00			1.00		0.98	1.00				
Frt		1.00			0.93		1.00	1.00				
Flt Protected		1.00			1.00		0.95	1.00				
Satd. Flow (prot)		3294			2939		1573	4652				
Flt Permitted		1.00			1.00		0.95	1.00				
Satd. Flow (perm)		3294			2939		1573	4652				
Peak-hour factor, PHF	0.80	0.80	0.80	0.79	0.79	0.79	0.99	0.99	0.99	0.92	0.92	0.92
Adj. Flow (vph)	0	700	0	0	494	494	91	2273	10	0	0	0
RTOR Reduction (vph)	0	0	0	0	3	0	0	0	0	0	0	0
Lane Group Flow (vph)	0	700	0	0	985	0	91	2283	0	0	0	0
Confl. Peds. (#/hr)	9		18	18		9	16		29	29		16
Heavy Vehicles (%)	0%	3%	0%	0%	3%	1%	3%	2%	6%	0%	0%	0%
Bus Blockages (#/hr)	0	4	0	0	4	0	0	0	0	0	0	0
Turn Type		NA			NA		Perm	NA				
Protected Phases		4			4			2				
Permitted Phases							2					
Actuated Green, G (s)		26.5			26.5		52.5	52.5				
Effective Green, g (s)		28.5			28.5		54.5	54.5				
Actuated g/C Ratio		0.32			0.32		0.61	0.61				
Clearance Time (s)		5.5			5.5		5.5	5.5				
Lane Grp Cap (vph)		1043			930		952	2817				
v/s Ratio Prot		0.21			c0.33			c0.49				
v/s Ratio Perm							0.06					
v/c Ratio		0.67			1.06		0.10	0.81				
Uniform Delay, d1		26.7			30.8		7.4	13.7				
Progression Factor		1.02			1.00		0.38	0.31				
Incremental Delay, d2		3.4			46.3		0.2	2.2				
Delay (s)		30.6			77.1		3.0	6.5				
Level of Service		C			E		A	A				
Approach Delay (s/veh)		30.6			77.1			6.3			0.0	
Approach LOS		C			E			A			A	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	27.7	HCM 2000 Level of Service	C
HCM 2000 Volume to Capacity ratio	0.90		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	7.0
Intersection Capacity Utilization	77.9%	ICU Level of Service	D
Analysis Period (min)	15		
Description: date collected 4/27/2023			

c Critical Lane Group



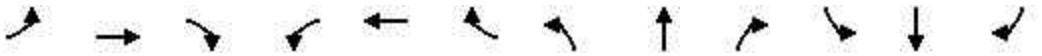
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	220	490	0	0	470	150	220	2150	180	0	0	0
Future Volume (vph)	220	490	0	0	470	150	220	2150	180	0	0	0
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	11	12	12	12	12	12	13	13	13	12	12	12
Total Lost time (s)	4.6	5.2			5.2		5.2	5.2				
Lane Util. Factor	1.00	0.95			0.95		1.00	0.91				
Frpb, ped/bikes	1.00	1.00			1.00		1.00	1.00				
Flpb, ped/bikes	1.00	1.00			1.00		1.00	1.00				
Frt	1.00	1.00			0.96		1.00	0.99				
Flt Protected	0.95	1.00			1.00		0.95	1.00				
Satd. Flow (prot)	1604	3340			3228		1759	4888				
Flt Permitted	0.24	1.00			1.00		0.95	1.00				
Satd. Flow (perm)	409	3340			3228		1759	4888				
Peak-hour factor, PHF	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97
Adj. Flow (vph)	227	505	0	0	485	155	227	2216	186	0	0	0
RTOR Reduction (vph)	0	0	0	0	32	0	0	10	0	0	0	0
Lane Group Flow (vph)	227	505	0	0	608	0	227	2392	0	0	0	0
Confl. Peds. (#/hr)	5		5	5		5	5		5	5		5
Heavy Vehicles (%)	3%	2%	0%	0%	1%	2%	0%	2%	2%	0%	0%	0%
Bus Blockages (#/hr)	0	2	0	0	2	0	0	4	0	0	0	0
Turn Type	pm+pt	NA			NA		Perm	NA				
Protected Phases	4	8			3			2				
Permitted Phases	8						2					
Actuated Green, G (s)	42.0	41.4			23.4		44.4	44.4				
Effective Green, g (s)	41.4	40.8			22.8		43.8	43.8				
Actuated g/C Ratio	0.44	0.43			0.24		0.46	0.46				
Clearance Time (s)	4.0	4.6			4.6		4.6	4.6				
Vehicle Extension (s)	1.0	3.0			3.0		3.0	3.0				
Lane Grp Cap (vph)	346	1434			774		810	2253				
v/s Ratio Prot	c0.09	0.15			c0.19			c0.49				
v/s Ratio Perm	0.19						0.13					
v/c Ratio	0.66	0.35			0.79		0.28	1.06				
Uniform Delay, d1	28.9	18.2			33.8		15.8	25.6				
Progression Factor	1.00	1.00			1.00		1.00	1.00				
Incremental Delay, d2	3.4	0.7			7.9		0.9	37.8				
Delay (s)	32.3	18.9			41.7		16.7	63.4				
Level of Service	C	B			D		B	E				
Approach Delay (s/veh)		23.0			41.7			59.4			0.0	
Approach LOS		C			D			E			A	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	49.9	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.92		
Actuated Cycle Length (s)	95.0	Sum of lost time (s)	15.0
Intersection Capacity Utilization	92.4%	ICU Level of Service	F
Analysis Period (min)	15		
Description: date collected 12/13/2023			
c Critical Lane Group			

Alternative 3 Synchro Reports

HCM 7th Signalized Intersection Summary
2: Division St & Wellesley Ave

11/05/2025



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	340	630	140	200	650	120	350	1120	220	100	1150	140
Future Volume (veh/h)	340	630	140	200	650	120	350	1120	220	100	1150	140
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.04	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.97	1.00		0.96	1.00		0.98	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1800	1744	1758	1800	1772	1843	1800	1786	1772	1772	1772	1786
Adj Flow Rate, veh/h	366	677	151	215	699	129	376	1204	237	108	1237	151
Peak Hour Factor	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93
Percent Heavy Veh, %	0	4	3	0	2	2	0	1	2	2	2	1
Cap, veh/h	314	729	162	234	761	340	301	2014	610	128	1364	167
Arrive On Green	0.18	0.27	0.26	0.14	0.23	0.23	0.18	0.41	0.41	0.08	0.31	0.31
Sat Flow, veh/h	1714	2674	596	1714	3367	1502	1714	4876	1478	1688	4356	532
Grp Volume(v), veh/h	366	419	409	215	699	129	376	1204	237	108	916	472
Grp Sat Flow(s),veh/h/ln	1714	1657	1613	1714	1683	1502	1714	1625	1478	1688	1612	1662
Q Serve(g_s), s	30.2	40.7	40.8	20.4	33.5	12.0	29.0	31.8	18.5	10.4	44.9	45.0
Cycle Q Clear(g_c), s	30.2	40.7	40.8	20.4	33.5	12.0	29.0	31.8	18.5	10.4	44.9	45.0
Prop In Lane	1.00		0.37	1.00		1.00	1.00		1.00	1.00		0.32
Lane Grp Cap(c), veh/h	314	452	440	234	761	340	301	2014	610	128	1010	521
V/C Ratio(X)	1.17	0.93	0.93	0.92	0.92	0.38	1.25	0.60	0.39	0.84	0.91	0.91
Avail Cap(c_a), veh/h	314	452	440	303	775	346	301	2014	610	215	1010	521
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	67.4	58.4	58.7	70.3	62.4	54.0	68.0	37.7	33.8	75.3	54.3	54.5
Incr Delay (d2), s/veh	103.9	25.3	26.1	27.6	15.6	0.5	136.2	1.3	1.9	13.9	13.2	22.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	22.3	20.3	19.9	10.8	16.0	4.6	24.1	13.0	7.1	5.0	20.1	22.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	171.3	83.7	84.8	97.9	77.9	54.6	204.2	39.1	35.7	89.2	67.5	76.5
LnGrp LOS	F	F	F	F	E	D	F	D	D	F	E	E
Approach Vol, veh/h		1194			1043			1817			1496	
Approach Delay, s/veh		110.9			79.1			72.8			71.9	
Approach LOS		F			E			E			E	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	16.5	72.2	35.0	41.3	33.0	55.7	27.3	49.0
Change Period (Y+Rc), s	4.0	5.0	4.4	5.4	4.0	5.0	4.4	5.4
Max Green Setting (Gmax), s	21.0	58.0	30.6	36.6	29.0	50.0	29.6	37.6
Max Q Clear Time (g_c+I1), s	12.4	33.8	32.2	35.5	31.0	47.0	22.4	42.8
Green Ext Time (p_c), s	0.2	8.2	0.0	0.5	0.0	1.9	0.5	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	82.0
HCM 7th LOS	F



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	770	110	180	880	0	0	0	0	80	820	100
Future Volume (veh/h)	0	770	110	180	880	0	0	0	0	80	820	100
Initial Q (Qb), veh	0	0	0	0	0	0				0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00				1.04	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00				1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Work Zone On Approach		No			No						No	
Adj Sat Flow, veh/h/ln	0	1786	1772	1786	1786	0				1843	1843	1843
Adj Flow Rate, veh/h	0	794	113	212	1035	0				85	872	106
Peak Hour Factor	0.97	0.97	0.97	0.85	0.85	0.85				0.94	0.94	0.94
Percent Heavy Veh, %	0	1	2	1	1	0				2	2	2
Cap, veh/h	0	920	131	238	1488	0				137	1400	170
Arrive On Green	0.00	0.31	0.30	0.09	0.44	0.00				0.47	0.47	0.47
Sat Flow, veh/h	0	3071	424	1701	3483	0				288	2957	359
Grp Volume(v), veh/h	0	452	455	212	1035	0				539	0	524
Grp Sat Flow(s),veh/h/ln	0	1697	1710	1701	1697	0				1828	0	1776
Q Serve(g_s), s	0.0	25.1	25.1	6.9	24.6	0.0				22.0	0.0	22.1
Cycle Q Clear(g_c), s	0.0	25.1	25.1	6.9	24.6	0.0				22.0	0.0	22.1
Prop In Lane	0.00		0.25	1.00		0.00				0.16		0.20
Lane Grp Cap(c), veh/h	0	523	527	238	1488	0				866	0	841
V/C Ratio(X)	0.00	0.86	0.86	0.89	0.70	0.00				0.62	0.00	0.62
Avail Cap(c_a), veh/h	0	655	660	238	1751	0				866	0	841
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Upstream Filter(I)	0.00	0.89	0.89	0.71	0.71	0.00				1.00	0.00	1.00
Uniform Delay (d), s/veh	0.0	32.6	32.7	43.3	22.7	0.0				19.7	0.0	19.7
Incr Delay (d2), s/veh	0.0	8.7	8.6	24.5	0.7	0.0				3.4	0.0	3.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0				0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	11.3	11.4	6.4	9.6	0.0				9.8	0.0	9.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	0.0	41.3	41.3	67.8	23.4	0.0				23.0	0.0	23.2
LnGrp LOS		D	D	E	C					C		C
Approach Vol, veh/h		907			1247						1063	
Approach Delay, s/veh		41.3			30.9						23.1	
Approach LOS		D			C						C	

Timer - Assigned Phs		4		6	7	8						
Phs Duration (G+Y+Rc), s		48.2		51.8	13.0	35.2						
Change Period (Y+Rc), s		5.0		5.0	5.0	5.0						
Max Green Setting (Gmax), s		51.0		39.0	8.0	38.0						
Max Q Clear Time (g_c+I1), s		26.6		24.1	8.9	27.1						
Green Ext Time (p_c), s		5.6		4.4	0.0	3.1						

Intersection Summary												
HCM 7th Control Delay, s/veh	31.3											
HCM 7th LOS	C											



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	40	1010	130	180	1420	40	410	90	140	50	60	40
Future Volume (veh/h)	40	1010	130	180	1420	40	410	90	140	50	60	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.04	1.04	1.00	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.99	1.00		0.96
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1800	1772	1786	1744	1800	1800	1800	1872	1828	1800	1872	1872
Adj Flow Rate, veh/h	44	1122	144	207	1632	46	334	225	146	79	95	63
Peak Hour Factor	0.90	0.90	0.90	0.87	0.87	0.87	0.96	0.96	0.96	0.63	0.63	0.63
Percent Heavy Veh, %	0	2	1	4	0	0	0	0	3	0	0	0
Cap, veh/h	160	1392	178	266	1686	47	393	242	157	135	81	54
Arrive On Green	0.05	0.46	0.45	0.09	0.50	0.49	0.23	0.23	0.21	0.08	0.08	0.06
Sat Flow, veh/h	1714	3002	384	1661	3397	96	1714	1055	685	1714	1032	684
Grp Volume(v), veh/h	44	628	638	207	819	859	334	0	371	79	0	158
Grp Sat Flow(s),veh/h/ln	1714	1683	1703	1661	1710	1783	1714	0	1740	1714	0	1716
Q Serve(g_s), s	1.5	36.1	36.3	7.1	52.4	52.9	21.1	0.0	23.6	5.0	0.0	8.9
Cycle Q Clear(g_c), s	1.5	36.1	36.3	7.1	52.4	52.9	21.1	0.0	23.6	5.0	0.0	8.9
Prop In Lane	1.00		0.23	1.00		0.05	1.00		0.39	1.00		0.40
Lane Grp Cap(c), veh/h	160	781	790	266	849	885	393	0	399	135	0	135
V/C Ratio(X)	0.27	0.80	0.81	0.78	0.97	0.97	0.85	0.00	0.93	0.59	0.00	1.17
Avail Cap(c_a), veh/h	267	781	790	414	849	885	393	0	399	135	0	135
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	25.6	25.9	26.1	23.1	27.5	27.7	41.7	0.0	43.0	50.3	0.0	52.4
Incr Delay (d2), s/veh	0.3	6.5	6.5	1.9	22.8	23.2	15.3	0.0	27.8	7.7	0.0	129.8
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.6	15.2	15.5	2.7	25.3	26.7	10.5	0.0	13.2	2.4	0.0	8.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	26.0	32.4	32.6	25.0	50.3	50.9	57.0	0.0	70.9	57.9	0.0	182.3
LnGrp LOS	C	C	C	C	D	D	E		E	E		F
Approach Vol, veh/h		1310			1885			705			237	
Approach Delay, s/veh		32.3			47.8			64.3			140.8	
Approach LOS		C			D			E			F	

Timer - Assigned Phs	2	3	4	6	7	8
Phs Duration (G+Y+Rc), s	30.0	10.0	61.0	12.0	14.0	57.0
Change Period (Y+Rc), s	6.0	4.0	6.0	5.0	4.0	6.0
Max Green Setting (Gmax), s	24.0	13.0	55.0	7.0	20.0	48.0
Max Q Clear Time (g_c+I1), s	25.6	3.5	54.9	10.9	9.1	38.3
Green Ext Time (p_c), s	0.0	0.0	0.1	0.0	0.3	5.7

Intersection Summary	
HCM 7th Control Delay, s/veh	51.0
HCM 7th LOS	D

Notes

User approved pedestrian interval to be less than phase max green.
User approved volume balancing among the lanes for turning movement.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	230	550	160	100	430	350	70	1010	60	240	710	40
Future Volume (veh/h)	230	550	160	100	430	350	70	1010	60	240	710	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.04	1.04	1.00	1.04	1.04	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		0.99	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1744	1857	1814	1786	1843	1843	1786	1758	1786	1758	1730	1786
Adj Flow Rate, veh/h	256	611	178	109	467	380	72	1041	62	247	732	41
Peak Hour Factor	0.90	0.90	0.90	0.92	0.92	0.92	0.97	0.97	0.97	0.97	0.97	0.97
Percent Heavy Veh, %	4	1	4	1	2	2	1	3	1	3	5	1
Cap, veh/h	279	829	241	225	437	355	306	1204	72	267	1405	79
Arrive On Green	0.13	0.31	0.30	0.06	0.24	0.23	0.03	0.38	0.37	0.10	0.44	0.44
Sat Flow, veh/h	1661	2682	780	1701	1825	1481	1701	3202	191	1674	3164	177
Grp Volume(v), veh/h	256	402	387	109	448	399	72	543	560	247	380	393
Grp Sat Flow(s),veh/h/ln	1661	1765	1697	1701	1751	1556	1701	1670	1723	1674	1643	1697
Q Serve(g_s), s	12.0	21.2	21.3	5.1	24.9	24.9	2.8	31.3	31.3	9.4	17.4	17.4
Cycle Q Clear(g_c), s	12.0	21.2	21.3	5.1	24.9	24.9	2.8	31.3	31.3	9.4	17.4	17.4
Prop In Lane	1.00		0.46	1.00		0.95	1.00		0.11	1.00		0.10
Lane Grp Cap(c), veh/h	279	545	525	225	419	373	306	628	648	267	730	754
V/C Ratio(X)	0.92	0.74	0.74	0.48	1.07	1.07	0.24	0.86	0.87	0.93	0.52	0.52
Avail Cap(c_a), veh/h	373	545	525	358	419	373	480	798	824	323	738	762
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	27.6	32.1	32.3	30.0	39.5	39.9	20.8	30.0	30.1	23.7	20.9	20.9
Incr Delay (d2), s/veh	19.9	4.6	4.8	0.6	63.4	66.9	0.1	8.2	8.0	26.5	0.7	0.7
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	6.2	9.6	9.3	2.1	17.9	16.3	1.1	13.4	13.8	5.4	6.5	6.8
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	47.6	36.7	37.2	30.6	102.9	106.8	20.9	38.2	38.1	50.2	21.6	21.6
LnGrp LOS	D	D	D	C	F	F	C	D	D	D	C	C
Approach Vol, veh/h		1045			956			1175			1020	
Approach Delay, s/veh		39.5			96.3			37.1			28.5	
Approach LOS		D			F			D			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.5	43.4	17.1	29.0	7.4	50.5	9.9	36.2
Change Period (Y+Rc), s	3.0	5.2	3.0	4.9	3.0	5.2	3.0	4.9
Max Green Setting (Gmax), s	15.0	48.8	20.0	24.1	15.0	45.8	15.0	22.1
Max Q Clear Time (g_c+I1), s	11.4	33.3	14.0	26.9	4.8	19.4	7.1	23.3
Green Ext Time (p_c), s	0.1	4.9	0.1	0.0	0.0	3.6	0.0	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	49.1
HCM 7th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	100	200	0	0	310	170	200	2330	150	0	0	0
Future Volume (veh/h)	100	200	0	0	310	170	200	2330	150	0	0	0
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0			
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		0.98	1.00		1.00			
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Work Zone On Approach		No			No			No				
Adj Sat Flow, veh/h/ln	1744	1702	0	0	1786	1772	1786	1772	1702			
Adj Flow Rate, veh/h	102	204	0	0	365	200	213	2479	160			
Peak Hour Factor	0.98	0.98	0.98	0.85	0.85	0.85	0.94	0.94	0.94			
Percent Heavy Veh, %	4	7	0	0	1	2	1	2	7			
Cap, veh/h	161	471	0	0	342	282	256	2969	189			
Arrive On Green	0.06	0.28	0.00	0.00	0.19	0.19	0.67	0.67	0.66			
Sat Flow, veh/h	1661	1702	0	0	1786	1474	381	4423	281			
Grp Volume(v), veh/h	102	204	0	0	365	200	980	893	979			
Grp Sat Flow(s),veh/h/ln	1661	1702	0	0	1786	1474	1753	1612	1720			
Q Serve(g_s), s	2.5	11.3	0.0	0.0	22.0	14.6	48.0	46.9	50.0			
Cycle Q Clear(g_c), s	2.5	11.3	0.0	0.0	22.0	14.6	48.0	46.9	50.0			
Prop In Lane	1.00		0.00	0.00		1.00	0.22		0.16			
Lane Grp Cap(c), veh/h	161	471	0	0	342	282	1177	1082	1155			
V/C Ratio(X)	0.63	0.43	0.00	0.00	1.07	0.71	0.83	0.83	0.85			
Avail Cap(c_a), veh/h	178	488	0	0	342	282	1177	1082	1155			
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Upstream Filter(I)	0.69	0.69	0.00	0.00	0.69	0.69	1.00	1.00	1.00			
Uniform Delay (d), s/veh	51.3	34.2	0.0	0.0	46.5	43.5	14.1	13.9	14.5			
Incr Delay (d2), s/veh	5.3	0.6	0.0	0.0	59.9	6.1	7.0	7.2	7.8			
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
%ile BackOfQ(50%),veh/ln	3.1	4.8	0.0	0.0	15.4	5.8	19.3	17.4	19.9			
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	56.6	34.8	0.0	0.0	106.4	49.6	21.1	21.1	22.3			
LnGrp LOS	E	C			F	D	C	C	C			
Approach Vol, veh/h		306			565			2852				
Approach Delay, s/veh		42.1			86.3			21.5				
Approach LOS		D			F			C				

Timer - Assigned Phs	2	3	4			8
Phs Duration (G+Y+Rc), s	80.2	9.8	25.0			34.8
Change Period (Y+Rc), s	5.0	5.0	5.0			5.0
Max Green Setting (Gmax), s	74.0	6.0	20.0			31.0
Max Q Clear Time (g_c+I1), s	52.0	4.5	24.0			13.3
Green Ext Time (p_c), s	10.7	0.1	0.0			1.0

Intersection Summary	
HCM 7th Control Delay, s/veh	33.0
HCM 7th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	110	120	380	280	170	190	170	1170	290	90	1450	50
Future Volume (veh/h)	110	120	380	280	170	190	170	1170	290	90	1450	50
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		0.99	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1786	1772	1786	1772	1772	1786	1786	1744	1730	1786	1786	1772
Adj Flow Rate, veh/h	138	150	475	333	202	226	177	1219	302	95	1526	53
Peak Hour Factor	0.80	0.80	0.80	0.84	0.84	0.84	0.96	0.96	0.96	0.95	0.95	0.95
Percent Heavy Veh, %	1	2	1	2	2	1	1	4	5	1	1	2
Cap, veh/h	159	499	471	278	366	392	158	1527	676	114	1445	50
Arrive On Green	0.09	0.21	0.21	0.16	0.28	0.28	0.09	0.46	0.46	0.07	0.43	0.43
Sat Flow, veh/h	1701	2374	1498	1688	1301	1394	1701	3313	1466	1701	3346	116
Grp Volume(v), veh/h	138	150	475	333	183	245	177	1219	302	95	772	807
Grp Sat Flow(s),veh/h/ln	1701	1187	1498	1688	1187	1508	1701	1657	1466	1701	1697	1765
Q Serve(g_s), s	12.0	8.0	31.6	24.8	19.8	21.0	14.0	47.2	21.0	8.3	65.0	65.0
Cycle Q Clear(g_c), s	12.0	8.0	31.6	24.8	19.8	21.0	14.0	47.2	21.0	8.3	65.0	65.0
Prop In Lane	1.00		1.00	1.00		0.92	1.00		1.00	1.00		0.07
Lane Grp Cap(c), veh/h	159	499	471	278	334	425	158	1527	676	114	733	762
V/C Ratio(X)	0.87	0.30	1.01	1.20	0.55	0.58	1.12	0.80	0.45	0.83	1.05	1.06
Avail Cap(c_a), veh/h	173	499	471	278	334	425	158	1527	676	124	733	762
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	67.3	50.1	51.7	62.8	46.0	46.6	68.3	34.6	27.5	69.3	42.7	42.8
Incr Delay (d2), s/veh	32.2	0.3	43.3	118.3	1.9	1.9	106.9	3.0	0.3	33.6	48.3	49.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	6.7	2.4	23.4	19.8	6.1	8.2	10.8	19.6	7.5	4.7	36.7	38.4
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	99.5	50.5	95.0	181.2	47.9	48.5	175.2	37.6	27.9	103.0	91.0	92.0
LnGrp LOS	F	D	F	F	D	D	F	D	C	F	F	F
Approach Vol, veh/h		763			761			1698			1674	
Approach Delay, s/veh		87.1			106.4			50.2			92.2	
Approach LOS		F			F			D			F	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.1	72.4	18.6	45.4	18.0	68.5	29.4	34.6
Change Period (Y+Rc), s	4.0	5.5	4.6	4.6	4.0	* 5.5	4.6	4.6
Max Green Setting (Gmax), s	10.0	65.5	15.3	39.5	14.0	* 63	24.8	30.0
Max Q Clear Time (g_c+I1), s	10.3	49.2	14.0	23.0	16.0	67.0	26.8	33.6
Green Ext Time (p_c), s	0.0	6.1	0.0	1.7	0.0	0.0	0.0	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	79.0
HCM 7th LOS	E

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	130	800	140	140	660	150	100	1230	90	110	1000	50
Future Volume (veh/h)	130	800	140	140	660	150	100	1230	90	110	1000	50
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.97	1.00		0.97	1.00		0.99	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1744	1758	1772	1786	1772	1786	1786	1758	1702	1758	1772	1646
Adj Flow Rate, veh/h	162	909	159	144	680	155	104	1281	94	117	1064	53
Peak Hour Factor	0.88	0.88	0.88	0.97	0.97	0.97	0.96	0.96	0.96	0.94	0.94	0.94
Percent Heavy Veh, %	4	3	2	1	2	1	1	3	7	3	2	11
Cap, veh/h	246	781	137	228	745	170	320	1476	108	251	1528	76
Arrive On Green	0.10	0.28	0.26	0.10	0.28	0.26	0.09	0.47	0.45	0.09	0.47	0.45
Sat Flow, veh/h	1661	2828	495	1701	2708	617	1701	3154	231	1674	3260	162
Grp Volume(v), veh/h	162	537	531	144	423	412	104	677	698	117	549	568
Grp Sat Flow(s),veh/h/ln	1661	1670	1653	1701	1683	1641	1701	1670	1715	1674	1683	1739
Q Serve(g_s), s	8.1	33.1	33.1	6.9	29.2	29.2	3.5	43.5	43.9	4.0	30.9	30.9
Cycle Q Clear(g_c), s	8.1	33.1	33.1	6.9	29.2	29.2	3.5	43.5	43.9	4.0	30.9	30.9
Prop In Lane	1.00		0.30	1.00		0.38	1.00		0.13	1.00		0.09
Lane Grp Cap(c), veh/h	246	461	456	228	463	451	320	782	802	251	789	815
V/C Ratio(X)	0.66	1.16	1.16	0.63	0.91	0.91	0.33	0.87	0.87	0.47	0.70	0.70
Avail Cap(c_a), veh/h	246	461	456	230	463	451	337	782	802	268	789	815
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.39	0.39	0.39	0.52	0.52	0.52	0.62	0.62	0.62
Uniform Delay (d), s/veh	30.2	43.4	43.7	30.2	42.1	42.5	17.5	28.6	28.8	23.6	25.1	25.2
Incr Delay (d2), s/veh	6.2	95.3	95.7	2.1	10.7	11.1	0.3	6.9	7.0	0.8	1.7	1.6
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.6	25.7	25.6	3.0	13.4	13.2	1.3	18.4	19.1	1.5	12.5	12.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	36.5	138.7	139.5	32.4	52.9	53.6	17.8	35.5	35.7	24.5	26.8	26.9
LnGrp LOS	D	F	F	C	D	D	B	D	D	C	C	C
Approach Vol, veh/h		1230			979			1479			1234	
Approach Delay, s/veh		125.6			50.2			34.4			26.6	
Approach LOS		F			D			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	12.8	58.2	14.0	35.0	12.8	58.2	13.9	35.1
Change Period (Y+Rc), s	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0
Max Green Setting (Gmax), s	9.0	52.0	9.0	30.0	9.0	52.0	9.0	30.0
Max Q Clear Time (g_c+I1), s	6.0	45.9	10.1	31.2	5.5	32.9	8.9	35.1
Green Ext Time (p_c), s	0.1	3.4	0.0	0.0	0.1	5.1	0.0	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	58.4
HCM 7th LOS	E



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	550	80	240	410	0	0	0	0	110	1400	120
Future Volume (veh/h)	0	550	80	240	410	0	0	0	0	110	1400	120
Initial Q (Qb), veh	0	0	0	0	0	0				0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00				1.04	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		1.00				1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Work Zone On Approach		No			No						No	
Adj Sat Flow, veh/h/ln	0	1772	1786	1786	1772	0				1857	1843	1843
Adj Flow Rate, veh/h	0	556	81	242	414	0				111	1414	121
Peak Hour Factor	0.99	0.99	0.99	0.99	0.99	0.99				0.99	0.99	0.99
Percent Heavy Veh, %	0	2	1	1	2	0				1	2	2
Cap, veh/h	0	738	107	322	1375	0				182	2315	752
Arrive On Green	0.00	0.25	0.26	0.11	0.41	0.00				0.48	0.48	0.49
Sat Flow, veh/h	0	3032	427	1701	3455	0				377	4801	1539
Grp Volume(v), veh/h	0	317	320	242	414	0				537	988	121
Grp Sat Flow(s),veh/h/ln	0	1683	1688	1701	1683	0				1824	1677	1539
Q Serve(g_s), s	0.0	16.5	16.6	9.8	7.9	0.0				20.5	20.5	4.1
Cycle Q Clear(g_c), s	0.0	16.5	16.6	9.8	7.9	0.0				20.5	20.5	4.1
Prop In Lane	0.00		0.25	1.00		0.00				0.21		1.00
Lane Grp Cap(c), veh/h	0	422	423	322	1375	0				879	1617	752
V/C Ratio(X)	0.00	0.75	0.76	0.75	0.30	0.00				0.61	0.61	0.16
Avail Cap(c_a), veh/h	0	422	423	322	1375	0				879	1617	752
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Upstream Filter(I)	0.00	1.00	1.00	0.29	0.29	0.00				1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	32.9	32.8	23.8	19.0	0.0				18.1	18.1	13.5
Incr Delay (d2), s/veh	0.0	11.7	11.9	2.8	0.2	0.0				3.2	1.7	0.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0				0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	8.0	8.0	4.1	3.1	0.0				8.9	7.8	1.5
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	0.0	44.6	44.8	26.6	19.1	0.0				21.2	19.8	14.0
LnGrp LOS		D	D	C	B					C	B	B
Approach Vol, veh/h		637			656						1646	
Approach Delay, s/veh		44.7			21.9						19.8	
Approach LOS		D			C						B	

Timer - Assigned Phs	2	3	4			8
Phs Duration (G+Y+Rc), s	51.0	15.0	29.0			44.0
Change Period (Y+Rc), s	4.6	4.0	4.6			4.6
Max Green Setting (Gmax), s	46.4	11.0	24.4			39.4
Max Q Clear Time (g_c+I1), s	22.5	11.8	18.6			9.9
Green Ext Time (p_c), s	0.5	0.0	0.1			0.2

Intersection Summary	
HCM 7th Control Delay, s/veh	25.7
HCM 7th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	210	800	250	60	590	100	220	330	40	160	460	170
Future Volume (veh/h)	210	800	250	60	590	100	220	330	40	160	460	170
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	0.99		0.96	1.00		0.97	1.00		0.99	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1772	1786	1772	1744	1800	1800	1772	1786	1716	1800	1786	1786
Adj Flow Rate, veh/h	226	860	269	64	628	106	227	340	41	172	495	183
Peak Hour Factor	0.93	0.93	0.93	0.94	0.94	0.94	0.97	0.97	0.97	0.93	0.93	0.93
Percent Heavy Veh, %	2	1	2	4	0	0	2	1	6	0	1	1
Cap, veh/h	329	883	276	182	887	149	314	836	100	434	609	224
Arrive On Green	0.11	0.35	0.34	0.06	0.30	0.30	0.11	0.32	0.31	0.09	0.29	0.29
Sat Flow, veh/h	1688	2516	785	1661	2911	490	1688	2610	313	1714	2074	763
Grp Volume(v), veh/h	226	580	549	64	368	366	227	155	226	172	285	393
Grp Sat Flow(s),veh/h/ln	1688	1697	1604	1661	1710	1691	1688	1197	1727	1714	1197	1641
Q Serve(g_s), s	8.0	29.8	29.9	2.3	16.9	17.0	8.3	8.9	9.1	6.3	19.5	19.7
Cycle Q Clear(g_c), s	8.0	29.8	29.9	2.3	16.9	17.0	8.3	8.9	9.1	6.3	19.5	19.7
Prop In Lane	1.00		0.49	1.00		0.29	1.00		0.18	1.00		0.47
Lane Grp Cap(c), veh/h	329	595	563	182	521	515	314	383	553	434	352	482
V/C Ratio(X)	0.69	0.97	0.98	0.35	0.71	0.71	0.72	0.40	0.41	0.40	0.81	0.82
Avail Cap(c_a), veh/h	455	595	563	382	600	593	618	420	606	788	420	576
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	20.4	28.3	28.5	23.2	27.2	27.3	21.8	23.4	23.5	20.2	28.9	29.1
Incr Delay (d2), s/veh	2.5	30.3	31.9	1.2	3.8	3.9	3.2	1.0	0.7	0.6	10.7	8.4
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.2	16.5	15.9	0.9	7.2	7.2	3.4	2.6	3.7	2.5	6.4	8.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	22.9	58.6	60.4	24.4	31.0	31.2	25.0	24.4	24.2	20.8	39.6	37.5
LnGrp LOS	C	E	E	C	C	C	C	C	C	C	D	D
Approach Vol, veh/h		1355			798			608			850	
Approach Delay, s/veh		53.4			30.6			24.6			34.9	
Approach LOS		D			C			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	11.7	32.3	13.4	30.9	14.1	30.0	9.3	35.0
Change Period (Y+Rc), s	3.0	4.6	3.0	4.6	3.0	4.6	3.0	4.6
Max Green Setting (Gmax), s	27.0	30.4	17.0	30.4	27.0	30.4	17.0	30.4
Max Q Clear Time (g_c+I1), s	8.3	11.1	10.0	19.0	10.3	21.7	4.3	31.9
Green Ext Time (p_c), s	0.6	2.2	0.5	3.6	0.8	2.9	0.1	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	39.1
HCM 7th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	60	580	150	220	490	250	170	260	150	380	520	40
Future Volume (veh/h)	60	580	150	220	490	250	170	260	150	380	520	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		0.98	0.99		0.98	0.99		0.99
Parking Bus, Adj	1.00	1.00	0.99	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1772	1786	1800	1772	1800	1786	1772	1786	1716	1800	1800	1800
Adj Flow Rate, veh/h	63	611	158	232	516	263	191	292	169	400	547	42
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.89	0.89	0.89	0.95	0.95	0.95
Percent Heavy Veh, %	2	1	0	2	0	1	2	1	6	0	0	0
Cap, veh/h	315	759	196	300	1146	500	389	511	287	488	1070	82
Arrive On Green	0.06	0.29	0.28	0.11	0.34	0.34	0.10	0.25	0.24	0.18	0.33	0.32
Sat Flow, veh/h	1688	2657	686	1688	3420	1490	1688	2079	1167	1714	3215	246
Grp Volume(v), veh/h	63	390	379	232	516	263	191	237	224	400	290	299
Grp Sat Flow(s),veh/h/ln	1688	1697	1646	1688	1710	1490	1688	1697	1549	1714	1710	1752
Q Serve(g_s), s	2.4	19.7	19.8	8.9	10.9	13.1	7.9	11.3	11.8	15.9	12.6	12.7
Cycle Q Clear(g_c), s	2.4	19.7	19.8	8.9	10.9	13.1	7.9	11.3	11.8	15.9	12.6	12.7
Prop In Lane	1.00		0.42	1.00		1.00	1.00		0.75	1.00		0.14
Lane Grp Cap(c), veh/h	315	484	470	300	1146	500	389	417	381	488	569	583
V/C Ratio(X)	0.20	0.80	0.81	0.77	0.45	0.53	0.49	0.57	0.59	0.82	0.51	0.51
Avail Cap(c_a), veh/h	509	588	571	408	1186	517	552	662	604	506	667	683
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	22.0	30.6	30.8	22.8	24.0	24.8	23.8	30.5	30.9	21.1	24.7	24.8
Incr Delay (d2), s/veh	0.1	7.5	7.9	4.1	0.4	1.3	0.4	1.7	2.1	9.3	1.0	1.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.9	8.8	8.7	3.7	4.4	4.7	3.1	4.7	4.6	7.3	5.1	5.3
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	22.1	38.1	38.6	26.9	24.4	26.0	24.1	32.2	33.0	30.3	25.7	25.8
LnGrp LOS	C	D	D	C	C	C	C	C	C	C	C	C
Approach Vol, veh/h		832			1011			652			989	
Approach Delay, s/veh		37.1			25.4			30.1			27.6	
Approach LOS		D			C			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	21.0	26.8	9.4	35.0	13.1	34.7	14.1	30.3
Change Period (Y+Rc), s	3.0	* 4.8	3.0	* 4.7	3.0	4.8	3.0	4.7
Max Green Setting (Gmax), s	18.0	* 35	17.0	* 31	19.0	35.2	17.0	31.3
Max Q Clear Time (g_c+I1), s	17.9	13.8	4.4	15.1	9.9	14.7	10.9	21.8
Green Ext Time (p_c), s	0.1	2.9	0.1	4.9	0.3	3.6	0.3	3.4

Intersection Summary	
HCM 7th Control Delay, s/veh	29.7
HCM 7th LOS	C

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	160	740	20	30	490	220	10	50	20	250	80	70
Future Volume (veh/h)	160	740	20	30	490	220	10	50	20	250	80	70
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.04	1.04	1.04	1.04	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		0.97	0.99		0.99	0.99		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1730	1744	1800	1800	1772	1786	1872	1784	1711	1843	1872	1814
Adj Flow Rate, veh/h	163	755	20	35	570	256	15	76	30	325	104	91
Peak Hour Factor	0.98	0.98	0.98	0.86	0.86	0.86	0.66	0.66	0.66	0.77	0.77	0.77
Percent Heavy Veh, %	5	4	0	0	2	1	0	6	11	2	0	4
Cap, veh/h	241	961	25	296	612	275	301	332	131	374	250	219
Arrive On Green	0.07	0.57	0.56	0.04	0.53	0.53	0.27	0.27	0.27	0.27	0.27	0.27
Sat Flow, veh/h	1647	1690	45	1714	1144	514	1247	1212	479	1327	915	801
Grp Volume(v), veh/h	163	0	775	35	0	826	15	0	106	325	0	195
Grp Sat Flow(s),veh/h/ln	1647	0	1735	1714	0	1658	1247	0	1691	1327	0	1715
Q Serve(g_s), s	3.9	0.0	33.1	0.8	0.0	43.9	0.9	0.0	4.6	21.4	0.0	8.9
Cycle Q Clear(g_c), s	3.9	0.0	33.1	0.8	0.0	43.9	9.8	0.0	4.6	26.0	0.0	8.9
Prop In Lane	1.00		0.03	1.00		0.31	1.00		0.28	1.00		0.47
Lane Grp Cap(c), veh/h	241	0	986	296	0	886	301	0	463	374	0	469
V/C Ratio(X)	0.68	0.00	0.79	0.12	0.00	0.93	0.05	0.00	0.23	0.87	0.00	0.42
Avail Cap(c_a), veh/h	410	0	986	531	0	886	301	0	463	374	0	469
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	0.81	0.00	0.81
Uniform Delay (d), s/veh	21.0	0.0	16.0	13.8	0.0	20.6	32.3	0.0	26.8	37.7	0.0	28.4
Incr Delay (d2), s/veh	3.3	0.0	6.3	0.2	0.0	17.6	0.1	0.0	0.2	16.0	0.0	0.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.1	0.0	13.7	0.3	0.0	19.9	0.3	0.0	1.9	9.2	0.0	3.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	24.3	0.0	22.3	14.0	0.0	38.2	32.4	0.0	27.1	53.7	0.0	28.9
LnGrp LOS	C		C	B		D	C		C	D		C
Approach Vol, veh/h		938			861			121			520	
Approach Delay, s/veh		22.6			37.3			27.7			44.4	
Approach LOS		C			D			C			D	

Timer - Assigned Phs	2	3	4	6	7	8
Phs Duration (G+Y+Rc), s	30.0	10.2	54.8	30.0	7.0	58.0
Change Period (Y+Rc), s	4.6	4.0	4.6	4.6	4.0	4.6
Max Green Setting (Gmax), s	25.4	16.0	40.4	25.4	16.0	40.4
Max Q Clear Time (g_c+I1), s	11.8	5.9	45.9	28.0	2.8	35.1
Green Ext Time (p_c), s	0.3	0.4	0.0	0.0	0.0	1.9

Intersection Summary	
HCM 7th Control Delay, s/veh	32.7
HCM 7th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	777	106	0	0	0	0	0	0	235	1324	0
Future Volume (veh/h)	0	777	106	0	0	0	0	0	0	235	1324	0
Initial Q (Qb), veh	0	0	0							0	0	0
Lane Width Adj.	1.00	1.00	1.00							1.04	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.99							1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00							1.00	1.00	1.00
Work Zone On Approach		No									No	
Adj Sat Flow, veh/h/ln	0	1595	1595							1619	1557	0
Adj Flow Rate, veh/h	0	785	107							250	1409	0
Peak Hour Factor	0.99	0.99	0.99							0.94	0.94	0.94
Percent Heavy Veh, %	0	2	2							5	5	0
Cap, veh/h	0	1597	216							427	2408	0
Arrive On Green	0.00	0.41	0.41							0.51	0.51	0.00
Sat Flow, veh/h	0	4015	524							833	4916	0
Grp Volume(v), veh/h	0	587	305							455	1204	0
Grp Sat Flow(s),veh/h/ln	0	1451	1493							1515	1339	0
Q Serve(g_s), s	0.0	11.9	12.1							16.7	16.7	0.0
Cycle Q Clear(g_c), s	0.0	11.9	12.1							16.7	16.7	0.0
Prop In Lane	0.00		0.35							0.55		0.00
Lane Grp Cap(c), veh/h	0	1197	616							777	2059	0
V/C Ratio(X)	0.00	0.49	0.50							0.59	0.59	0.00
Avail Cap(c_a), veh/h	0	1197	616							777	2059	0
HCM Platoon Ratio	1.00	1.00	1.00							1.00	1.00	1.00
Upstream Filter(I)	0.00	0.98	0.98							0.76	0.76	0.00
Uniform Delay (d), s/veh	0.0	17.3	17.4							13.6	13.6	0.0
Incr Delay (d2), s/veh	0.0	1.4	2.8							2.5	0.9	0.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0							0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	4.0	4.4							5.7	4.7	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	0.0	18.7	20.2							16.0	14.5	0.0
LnGrp LOS		B	C							B	B	
Approach Vol, veh/h		892									1659	
Approach Delay, s/veh		19.2									14.9	
Approach LOS		B									B	

Timer - Assigned Phs	2	4
Phs Duration (G+Y+Rc), s	44.0	36.0
Change Period (Y+Rc), s	4.6	4.6
Max Green Setting (Gmax), s	39.4	31.4
Max Q Clear Time (g_c+I1), s	18.7	14.1
Green Ext Time (p_c), s	0.8	0.4

Intersection Summary	
HCM 7th Control Delay, s/veh	16.4
HCM 7th LOS	B



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	50	910	210	180	840	140	130	120	190	270	250	70
Future Volume (veh/h)	50	910	210	180	840	140	130	120	190	270	250	70
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		0.99	1.00		0.99	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1716	1758	1800	1786	1772	1688	1660	1716	1786	1758	1744	1772
Adj Flow Rate, veh/h	56	1011	233	188	875	146	137	126	200	303	281	79
Peak Hour Factor	0.90	0.90	0.90	0.96	0.96	0.96	0.95	0.95	0.95	0.89	0.89	0.89
Percent Heavy Veh, %	6	3	0	1	2	8	10	6	1	3	4	2
Cap, veh/h	232	1199	275	213	1397	233	166	152	234	350	325	91
Arrive On Green	0.03	0.45	0.44	0.07	0.48	0.48	0.18	0.18	0.18	0.23	0.23	0.23
Sat Flow, veh/h	1634	2694	619	1701	2884	481	942	862	1330	1525	1415	398
Grp Volume(v), veh/h	56	626	618	188	511	510	243	0	220	331	0	332
Grp Sat Flow(s),veh/h/ln	1634	1670	1642	1701	1683	1682	1669	0	1466	1668	0	1670
Q Serve(g_s), s	3.1	54.2	54.7	9.7	36.6	36.7	22.9	0.0	23.8	31.1	0.0	31.1
Cycle Q Clear(g_c), s	3.1	54.2	54.7	9.7	36.6	36.7	22.9	0.0	23.8	31.1	0.0	31.1
Prop In Lane	1.00		0.38	1.00		0.29	0.56		0.91	0.91		0.24
Lane Grp Cap(c), veh/h	232	743	731	213	815	815	294	0	258	383	0	383
V/C Ratio(X)	0.24	0.84	0.85	0.88	0.63	0.63	0.83	0.00	0.85	0.87	0.00	0.87
Avail Cap(c_a), veh/h	347	743	731	266	815	815	426	0	374	532	0	533
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.81	0.81	0.81	1.00	1.00	1.00	1.00	0.00	1.00	0.96	0.00	0.96
Uniform Delay (d), s/veh	27.1	40.1	40.4	35.5	31.1	31.2	64.7	0.0	65.1	60.4	0.0	60.4
Incr Delay (d2), s/veh	0.2	7.4	7.7	21.2	3.6	3.6	7.3	0.0	10.8	10.2	0.0	10.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.2	23.5	23.5	5.2	15.7	15.7	10.4	0.0	9.7	14.3	0.0	14.3
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	27.2	47.5	48.1	56.7	34.7	34.8	72.1	0.0	75.9	70.6	0.0	70.6
LnGrp LOS	C	D	D	E	C	C	E		E	E		E
Approach Vol, veh/h		1300			1209			463			663	
Approach Delay, s/veh		46.9			38.2			73.9			70.6	
Approach LOS		D			D			E			E	

Timer - Assigned Phs	2	3	4		6	7	8
Phs Duration (G+Y+Rc), s	32.1	8.5	81.9		40.4	14.9	75.6
Change Period (Y+Rc), s	5.0	3.0	4.9		4.6	3.0	4.9
Max Green Setting (Gmax), s	40.0	17.0	38.1		50.4	17.0	38.1
Max Q Clear Time (g_c+I1), s	25.8	5.1	38.7		33.1	11.7	56.7
Green Ext Time (p_c), s	1.4	0.1	0.0		2.7	0.2	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	51.8
HCM 7th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	70	790	140	90	800	210	200	200	100	250	90	70
Future Volume (veh/h)	70	790	140	90	800	210	200	200	100	250	90	70
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1744	1772	1744	1716	1786	1786	1772	1758	1702	1744	1758	1786
Adj Flow Rate, veh/h	71	806	143	102	909	0	247	247	123	305	110	85
Peak Hour Factor	0.98	0.98	0.98	0.88	0.88	0.88	0.81	0.81	0.81	0.82	0.82	0.82
Percent Heavy Veh, %	4	2	4	6	1	1	2	3	7	4	3	1
Cap, veh/h	164	977	427	194	1035		314	732	353	265	735	524
Arrive On Green	0.04	0.29	0.29	0.06	0.30	0.00	0.10	0.34	0.34	0.16	0.40	0.40
Sat Flow, veh/h	1661	3367	1472	1634	3393	1514	3274	2184	1053	1661	1862	1325
Grp Volume(v), veh/h	71	806	143	102	909	0	247	187	183	305	98	97
Grp Sat Flow(s),veh/h/ln	1661	1683	1472	1634	1697	1514	1637	1670	1566	1661	1670	1517
Q Serve(g_s), s	3.6	27.3	9.3	5.3	31.1	0.0	9.0	10.2	10.8	19.5	4.6	5.1
Cycle Q Clear(g_c), s	3.6	27.3	9.3	5.3	31.1	0.0	9.0	10.2	10.8	19.5	4.6	5.1
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.67	1.00		0.87
Lane Grp Cap(c), veh/h	164	977	427	194	1035		314	560	525	265	660	599
V/C Ratio(X)	0.43	0.83	0.33	0.53	0.88		0.79	0.33	0.35	1.15	0.15	0.16
Avail Cap(c_a), veh/h	307	1093	478	445	1185		670	560	525	265	660	599
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	32.2	40.5	34.1	31.3	40.3	0.0	54.1	30.4	30.6	51.4	23.8	23.9
Incr Delay (d2), s/veh	1.8	4.8	0.5	2.2	7.1	0.0	4.4	1.6	1.8	102.4	0.5	0.6
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.5	11.8	3.4	2.2	13.7	0.0	3.9	4.4	4.3	15.6	1.9	1.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	34.0	45.3	34.6	33.5	47.4	0.0	58.4	32.0	32.4	153.8	24.2	24.5
LnGrp LOS	C	D	C	C	D		E	C	C	F	C	C
Approach Vol, veh/h		1020			1011			617			500	
Approach Delay, s/veh		43.0			46.0			42.7			103.3	
Approach LOS		D			D			D			F	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	11.3	40.8	24.0	46.2	9.5	42.6	16.7	53.5
Change Period (Y+Rc), s	4.0	5.3	4.5	5.2	4.0	5.3	5.0	* 5.2
Max Green Setting (Gmax), s	26.0	39.7	19.5	41.0	16.0	42.7	25.0	* 35
Max Q Clear Time (g_c+I1), s	7.3	29.3	21.5	12.8	5.6	33.1	11.0	7.1
Green Ext Time (p_c), s	0.2	4.3	0.0	2.3	0.1	4.2	0.7	1.1

Intersection Summary	
HCM 7th Control Delay, s/veh	53.5
HCM 7th LOS	D

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.
Unsignalized Delay for [WBR] is excluded from calculations of the approach delay and intersection delay.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	280	260	50	330	140	270	70	720	170	210	810	20
Future Volume (veh/h)	280	260	50	330	140	270	70	720	170	210	810	20
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.04	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.99	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.99
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1786	1772	1786	1772	1786	1857	1772	1772	1772	1772	1772	1786
Adj Flow Rate, veh/h	219	418	0	250	290	0	75	774	183	216	835	21
Peak Hour Factor	0.90	0.90	0.90	0.94	0.94	0.94	0.93	0.93	0.93	0.97	0.97	0.97
Percent Heavy Veh, %	1	2	1	2	1	1	2	2	2	2	2	1
Cap, veh/h	291	607		332	352		110	1093	484	203	1270	32
Arrive On Green	0.17	0.17	0.00	0.20	0.20	0.00	0.07	0.32	0.32	0.12	0.38	0.36
Sat Flow, veh/h	1701	3544	0	1688	1786	1574	1688	3367	1490	1688	3341	84
Grp Volume(v), veh/h	219	418	0	250	290	0	75	774	183	216	421	435
Grp Sat Flow(s),veh/h/ln	1701	1772	0	1688	1786	1574	1688	1683	1490	1688	1683	1742
Q Serve(g_s), s	11.4	10.3	0.0	13.0	14.5	0.0	4.0	18.8	8.8	11.2	19.2	19.2
Cycle Q Clear(g_c), s	11.4	10.3	0.0	13.0	14.5	0.0	4.0	18.8	8.8	11.2	19.2	19.2
Prop In Lane	1.00		0.00	1.00		1.00	1.00		1.00	1.00		0.05
Lane Grp Cap(c), veh/h	291	607		332	352		110	1093	484	203	640	662
V/C Ratio(X)	0.75	0.69		0.75	0.82		0.68	0.71	0.38	1.06	0.66	0.66
Avail Cap(c_a), veh/h	433	903		430	455		203	1592	705	203	796	824
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	36.7	36.2	0.0	35.2	35.8	0.0	42.6	27.6	24.2	40.9	23.8	23.9
Incr Delay (d2), s/veh	1.7	0.5	0.0	3.7	7.4	0.0	2.8	1.5	0.8	81.0	2.2	2.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.8	4.4	0.0	5.6	6.9	0.0	1.7	7.2	3.0	9.0	7.4	7.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	38.4	36.8	0.0	38.9	43.2	0.0	45.4	29.0	25.0	121.9	26.0	26.0
LnGrp LOS	D	D		D	D		D	C	C	F	C	C
Approach Vol, veh/h		637			540			1032			1072	
Approach Delay, s/veh		37.3			41.2			29.5			45.3	
Approach LOS		D			D			C			D	

Timer - Assigned Phs	1	2		4	5	6		8
Phs Duration (G+Y+Rc), s	16.0	34.2		22.6	10.8	39.4		20.2
Change Period (Y+Rc), s	4.0	5.7		4.9	4.0	5.7		4.9
Max Green Setting (Gmax), s	12.0	42.3		23.1	12.0	42.3		23.1
Max Q Clear Time (g_c+I1), s	13.2	20.8		16.5	6.0	21.2		13.4
Green Ext Time (p_c), s	0.0	7.8		0.8	0.0	6.3		1.3

Intersection Summary	
HCM 7th Control Delay, s/veh	38.1
HCM 7th LOS	D

Notes

User approved volume balancing among the lanes for turning movement.
Unsignalized Delay for [EBR, WBR] is excluded from calculations of the approach delay and intersection delay.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	70	1880	100	210	1660	290	220	130	210	220	40	50
Future Volume (veh/h)	70	1880	100	210	1660	290	220	130	210	220	40	50
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1856	1856	1811	1870	1856	1885	1885	1841	1856	1841	1885
Adj Flow Rate, veh/h	74	2000	0	221	1747	0	268	159	0	237	43	54
Peak Hour Factor	0.94	0.94	0.94	0.95	0.95	0.95	0.82	0.82	0.82	0.93	0.93	0.93
Percent Heavy Veh, %	2	3	3	6	2	3	1	1	4	3	4	1
Cap, veh/h	127	1419		302	1497		355	211		273	122	153
Arrive On Green	0.07	0.40	0.00	0.09	0.42	0.00	0.10	0.11	0.00	0.15	0.16	0.16
Sat Flow, veh/h	1781	3526	1572	3346	3554	1572	3483	1885	1560	1767	741	930
Grp Volume(v), veh/h	74	2000	0	221	1747	0	268	159	0	237	0	97
Grp Sat Flow(s),veh/h/ln	1781	1763	1572	1673	1777	1572	1742	1885	1560	1767	0	1671
Q Serve(g_s), s	3.9	38.8	0.0	6.2	40.6	0.0	7.2	7.9	0.0	12.6	0.0	5.0
Cycle Q Clear(g_c), s	3.9	38.8	0.0	6.2	40.6	0.0	7.2	7.9	0.0	12.6	0.0	5.0
Prop In Lane	1.00		1.00	1.00		1.00	1.00		1.00	1.00		0.56
Lane Grp Cap(c), veh/h	127	1419		302	1497		355	211		273	0	275
V/C Ratio(X)	0.58	1.41		0.73	1.17		0.75	0.75		0.87	0.00	0.35
Avail Cap(c_a), veh/h	360	1419		677	1497		705	469		358	0	416
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	43.3	28.8	0.0	42.7	27.9	0.0	42.1	41.5	0.0	39.8	0.0	35.7
Incr Delay (d2), s/veh	4.1	188.5	0.0	3.4	82.8	0.0	3.3	5.3	0.0	16.2	0.0	0.8
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.8	51.9	0.0	2.6	32.6	0.0	3.1	3.8	0.0	6.5	0.0	2.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	47.5	217.3	0.0	46.1	110.7	0.0	45.4	46.8	0.0	56.0	0.0	36.5
LnGrp LOS	D	F		D	F		D	D		E		D
Approach Vol, veh/h		2074			1968			427			334	
Approach Delay, s/veh		211.2			103.5			45.9			50.3	
Approach LOS		F			F			D			D	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	10.4	16.8	12.4	46.8	15.3	21.9	14.2	45.0
Change Period (Y+Rc), s	5.5	6.0	5.5	* 6.2	5.5	6.0	5.5	* 6.2
Max Green Setting (Gmax), s	19.5	24.0	19.5	* 39	19.5	24.0	19.5	* 39
Max Q Clear Time (g_c+I1), s	14.6	9.9	5.9	42.6	9.2	7.0	8.2	40.8
Green Ext Time (p_c), s	0.3	0.6	0.1	0.0	0.6	0.4	0.5	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	141.2
HCM 7th LOS	F

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.

Unsignalized Delay for [NBR, EBR, WBR] is excluded from calculations of the approach delay and intersection delay.

Intersection	
Int Delay, s/veh	47.7

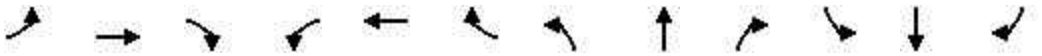
Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	600	0	470	320	0	540
Future Vol, veh/h	600	0	470	320	0	540
Conflicting Peds, #/hr	0	1	1	0	2	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	75	-	-	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	86	86	92	92	96	96
Heavy Vehicles, %	1	1	1	2	1	1
Mvmt Flow	698	0	511	348	0	563

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	-	699	0	-	699
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	-	4.11	-	-	6.21
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	-	2.209	-	-	3.309
Pot Cap-1 Maneuver	-	0	903	-	0	~ 442
Stage 1	-	0	-	-	0	-
Stage 2	-	0	-	-	0	-
Platoon blocked, %	-			-		
Mov Cap-1 Maneuver	-	-	902	-	-	~ 441
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	EB	WB	NB
HCM Control Delay, s/v	0	8.37	167
HCM LOS			F

Minor Lane/Major Mvmt	NBLn1	EBT	WBL	WBT
Capacity (veh/h)	441	-	902	-
HCM Lane V/C Ratio	1.274	-	0.567	-
HCM Control Delay (s/veh)	167	-	14.1	-
HCM Lane LOS	F	-	B	-
HCM 95th %tile Q(veh)	23.9	-	3.6	-

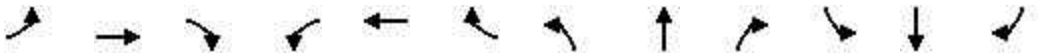
Notes			
~: Volume exceeds capacity	$: Delay exceeds 300s	+: Computation Not Defined	*: All major volume in platoon



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	0	600	120	540	680	0	0	0	0	120	340	60
Future Volume (vph)	0	600	120	540	680	0	0	0	0	120	340	60
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	12	12	12	12	12	12	12	12	12	14	14	14
Total Lost time (s)		4.0		3.5	4.0						4.0	
Lane Util. Factor		0.95		1.00	0.95						0.95	
Frpb, ped/bikes		1.00		1.00	1.00						1.00	
Flpb, ped/bikes		1.00		1.00	1.00						1.00	
Frt		0.98		1.00	1.00						0.98	
Flt Protected		1.00		0.95	1.00						0.99	
Satd. Flow (prot)		3242		1583	3294						3347	
Flt Permitted		1.00		0.15	1.00						0.99	
Satd. Flow (perm)		3242		256	3294						3347	
Peak-hour factor, PHF	0.90	0.90	0.90	0.93	0.93	0.93	0.92	0.92	0.92	0.88	0.88	0.88
Adj. Flow (vph)	0	667	133	581	731	0	0	0	0	136	386	68
RTOR Reduction (vph)	0	18	0	0	0	0	0	0	0	0	11	0
Lane Group Flow (vph)	0	782	0	581	731	0	0	0	0	0	579	0
Confl. Peds. (#/hr)	12		6	6		12	7					7
Heavy Vehicles (%)	0%	2%	5%	8%	3%	0%	0%	0%	0%	7%	6%	1%
Bus Blockages (#/hr)	0	0	4	0	4	0	0	0	0	0	0	2
Turn Type		NA		pm+pt	NA					Perm	NA	
Protected Phases		8		7	4						2	
Permitted Phases				4						2		
Actuated Green, G (s)		21.4		46.9	46.4						34.1	
Effective Green, g (s)		22.0		47.5	47.0						35.0	
Actuated g/C Ratio		0.24		0.53	0.52						0.39	
Clearance Time (s)		4.6		4.1	4.6						4.9	
Lane Grp Cap (vph)		792		452	1720						1301	
v/s Ratio Prot		0.24		c0.31	0.22							
v/s Ratio Perm				c0.37							0.17	
v/c Ratio		0.99		1.29	0.43						0.45	
Uniform Delay, d1		33.9		29.0	13.2						20.3	
Progression Factor		1.00		1.00	1.00						1.00	
Incremental Delay, d2		29.0		144.4	0.8						1.1	
Delay (s)		62.9		173.4	14.0						21.4	
Level of Service		E		F	B						C	
Approach Delay (s/veh)		62.9			84.6			0.0			21.4	
Approach LOS		E			F			A			C	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	64.4	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	0.94		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	11.5
Intersection Capacity Utilization	81.6%	ICU Level of Service	D
Analysis Period (min)	15		
Description: date collected 3/21/2019			

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	320	700	210	130	690	190	340	970	110	150	860	250
Future Volume (vph)	320	700	210	130	690	190	340	970	110	150	860	250
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	11	12	12	11	12	13	11	11	12	11	11	12
Total Lost time (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0
Lane Util. Factor	0.97	0.95	1.00	0.97	0.95	1.00	1.00	0.91	1.00	1.00	0.91	1.00
Frpb, ped/bikes	1.00	1.00	0.97	1.00	1.00	0.98	1.00	1.00	0.98	1.00	1.00	0.98
Flpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	3144	3320	1444	3113	3386	1532	1653	4657	1463	1637	4568	1503
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	3144	3320	1444	3113	3386	1532	1653	4657	1463	1637	4568	1503
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	337	737	221	137	726	200	358	1021	116	158	905	263
RTOR Reduction (vph)	0	0	78	0	0	151	0	0	67	0	0	176
Lane Group Flow (vph)	337	737	143	137	726	49	358	1021	49	158	905	87
Confl. Peds. (#/hr)	7		12	12		7	4		9	9		4
Heavy Vehicles (%)	2%	3%	3%	3%	1%	1%	0%	2%	2%	1%	4%	0%
Turn Type	Prot	NA	Perm	Prot	NA	Perm	Prot	NA	Perm	Prot	NA	Perm
Protected Phases	3	8		7	4		5	2		1	6	
Permitted Phases			8			4			2			6
Actuated Green, G (s)	21.5	47.4	47.4	11.7	37.8	37.8	38.2	68.1	68.1	17.6	47.5	47.5
Effective Green, g (s)	23.5	49.6	49.6	13.7	39.8	39.8	40.2	70.1	70.1	19.6	49.5	49.5
Actuated g/C Ratio	0.14	0.30	0.30	0.08	0.24	0.24	0.24	0.42	0.42	0.12	0.30	0.30
Clearance Time (s)	5.0	5.2	5.2	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0
Vehicle Extension (s)	2.0	3.0	3.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	3.0	3.0
Lane Grp Cap (vph)	447	998	434	258	816	369	402	1978	621	194	1370	450
v/s Ratio Prot	c0.11	0.22		0.04	c0.21		c0.22	0.22		0.10	c0.20	
v/s Ratio Perm			0.10			0.03			0.03			0.06
v/c Ratio	0.75	0.74	0.33	0.53	0.89	0.13	0.89	0.52	0.08	0.81	0.66	0.19
Uniform Delay, d1	68.0	51.9	44.8	72.6	60.5	49.1	60.3	35.0	28.2	70.9	50.4	42.9
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	6.3	2.9	0.4	1.1	11.4	0.1	20.6	1.0	0.2	21.3	2.5	1.0
Delay (s)	74.3	54.8	45.2	73.6	71.8	49.1	80.9	35.9	28.5	92.3	52.9	43.9
Level of Service	E	D	D	E	E	D	F	D	C	F	D	D
Approach Delay (s/veh)		58.2			67.8			46.1			55.8	
Approach LOS		E			E			D			E	

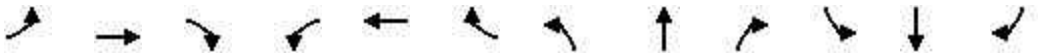
Intersection Summary			
HCM 2000 Control Delay (s/veh)	56.1	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	0.79		
Actuated Cycle Length (s)	165.0	Sum of lost time (s)	12.0
Intersection Capacity Utilization	92.7%	ICU Level of Service	F
Analysis Period (min)	15		
Description: date collected 12/12/2023			

c Critical Lane Group



Movement	WBL	WBR	WBR2	NBL	NBT	NBR	SBL	SBT	SBR	SEL2	SEL	SER
Lane Configurations												
Traffic Volume (vph)	220	680	700	210	790	240	0	0	0	60	710	630
Future Volume (vph)	220	680	700	210	790	240	0	0	0	60	710	630
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	12	12	13	12	12	12	12	12	12	12	12	13
Total Lost time (s)	3.0	3.0	3.0		3.0	3.0				3.0	3.0	2.6
Lane Util. Factor	1.00	0.88	1.00		0.95	1.00				1.00	0.97	1.00
Frpb, ped/bikes	1.00	1.00	0.98		1.00	1.00				1.00	1.00	1.00
Flpb, ped/bikes	1.00	1.00	1.00		1.00	1.00				1.00	1.00	1.00
Frt	1.00	0.85	0.85		1.00	0.85				1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00		0.99	1.00				0.95	0.95	1.00
Satd. Flow (prot)	1629	2554	1470		3292	1500				1629	3147	1487
Flt Permitted	0.95	1.00	1.00		0.99	1.00				0.95	0.95	1.00
Satd. Flow (perm)	1629	2554	1470		3292	1500				1629	3147	1487
Peak-hour factor, PHF	0.96	0.96	0.96	0.94	0.94	0.94	0.92	0.92	0.92	0.93	0.93	0.93
Adj. Flow (vph)	229	708	729	223	840	255	0	0	0	65	763	677
RTOR Reduction (vph)	0	0	298	0	0	151	0	0	0	0	0	30
Lane Group Flow (vph)	229	708	431	0	1063	104	0	0	0	65	763	647
Confl. Peds. (#/hr)	11		10	2					2	10		11
Heavy Vehicles (%)	5%	5%	5%	2%	2%	2%	2%	2%	2%	5%	5%	5%
Bus Blockages (#/hr)	0	2	0	0	4	0	0	0	0	0	2	2
Turn Type	Prot	Prot	Perm	Split	NA	Perm				Prot	Prot	pt+ov
Protected Phases	7	6		8	8					5	5 6	6 8
Permitted Phases			6			8						5 6
Actuated Green, G (s)	10.8	23.8	23.8		31.3	31.3				10.4	38.4	70.1
Effective Green, g (s)	12.0	25.0	25.0		32.9	32.9				12.0	37.4	70.3
Actuated g/C Ratio	0.13	0.27	0.27		0.35	0.35				0.13	0.40	0.75
Clearance Time (s)	4.2	4.2	4.2		4.6	4.6				4.6		
Vehicle Extension (s)	2.0	3.5	3.5		2.5	2.5				2.0		
Lane Grp Cap (vph)	208	679	391		1153	525				208	1253	1154
v/s Ratio Prot	c0.14	0.28			c0.32					0.04	0.24	c0.35
v/s Ratio Perm			c0.29			0.07						0.09
v/c Ratio	1.10	1.04	1.10		0.92	0.20				0.31	0.61	0.56
Uniform Delay, d1	41.0	34.5	34.5		29.3	21.3				37.2	22.4	5.1
Progression Factor	1.00	1.00	1.00		1.00	1.00				0.83	0.76	1.07
Incremental Delay, d2	92.0	46.2	76.1		12.0	0.1				0.3	0.5	0.6
Delay (s)	133.0	80.6	110.6		41.3	21.4				31.1	17.5	6.1
Level of Service	F	F	F		D	C				C	B	A
Approach Delay (s/veh)	100.9				37.4			0.0			12.9	
Approach LOS	F				D			A			B	

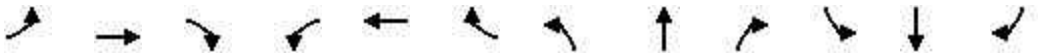
Intersection Summary			
HCM 2000 Control Delay (s/veh)	52.8	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	1.15		
Actuated Cycle Length (s)	93.9	Sum of lost time (s)	24.8
Intersection Capacity Utilization	82.9%	ICU Level of Service	E
Analysis Period (min)	15		
Description: date collected 10/5/2022			
c Critical Lane Group			



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	0	590	0	0	420	400	100	2300	10	0	0	0
Future Volume (vph)	0	590	0	0	420	400	100	2300	10	0	0	0
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	12	12	12	12	11	11	11	11	11	12	12	12
Total Lost time (s)		3.5			3.5		3.5	3.5				
Lane Util. Factor		0.95			0.95		1.00	0.91				
Frpb, ped/bikes		1.00			0.99		1.00	1.00				
Flpb, ped/bikes		1.00			1.00		0.98	1.00				
Frt		1.00			0.93		1.00	1.00				
Flt Protected		1.00			1.00		0.95	1.00				
Satd. Flow (prot)		3294			2946		1573	4652				
Flt Permitted		1.00			1.00		0.95	1.00				
Satd. Flow (perm)		3294			2946		1573	4652				
Peak-hour factor, PHF	0.80	0.80	0.80	0.79	0.79	0.79	0.99	0.99	0.99	0.92	0.92	0.92
Adj. Flow (vph)	0	738	0	0	532	506	101	2323	10	0	0	0
RTOR Reduction (vph)	0	0	0	0	3	0	0	0	0	0	0	0
Lane Group Flow (vph)	0	738	0	0	1035	0	101	2333	0	0	0	0
Confl. Peds. (#/hr)	9		18	18		9	16		29	29		16
Heavy Vehicles (%)	0%	3%	0%	0%	3%	1%	3%	2%	6%	0%	0%	0%
Bus Blockages (#/hr)	0	4	0	0	4	0	0	0	0	0	0	0
Turn Type		NA			NA		Perm	NA				
Protected Phases		4			4			2				
Permitted Phases							2					
Actuated Green, G (s)		26.5			26.5		52.5	52.5				
Effective Green, g (s)		28.5			28.5		54.5	54.5				
Actuated g/C Ratio		0.32			0.32		0.61	0.61				
Clearance Time (s)		5.5			5.5		5.5	5.5				
Lane Grp Cap (vph)		1043			932		952	2817				
v/s Ratio Prot		0.22			c0.35			c0.50				
v/s Ratio Perm							0.06					
v/c Ratio		0.71			1.11		0.11	0.83				
Uniform Delay, d1		27.1			30.8		7.5	14.0				
Progression Factor		1.02			1.00		0.39	0.33				
Incremental Delay, d2		4.0			64.5		0.2	2.5				
Delay (s)		31.6			95.2		3.1	7.1				
Level of Service		C			F		A	A				
Approach Delay (s/veh)		31.6			95.2			7.0			0.0	
Approach LOS		C			F			A			A	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	33.1	HCM 2000 Level of Service	C
HCM 2000 Volume to Capacity ratio	0.92		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	7.0
Intersection Capacity Utilization	80.1%	ICU Level of Service	D
Analysis Period (min)	15		
Description: date collected 4/27/2023			

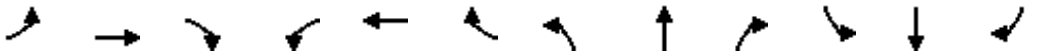
c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	220	500	0	0	480	140	230	2190	180	0	0	0
Future Volume (vph)	220	500	0	0	480	140	230	2190	180	0	0	0
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	11	12	12	12	12	12	13	13	13	12	12	12
Total Lost time (s)	4.6	5.2			5.2		5.2	5.2				
Lane Util. Factor	1.00	0.95			0.95		1.00	0.91				
Frpb, ped/bikes	1.00	1.00			1.00		1.00	1.00				
Flpb, ped/bikes	1.00	1.00			1.00		1.00	1.00				
Frt	1.00	1.00			0.97		1.00	0.99				
Flt Protected	0.95	1.00			1.00		0.95	1.00				
Satd. Flow (prot)	1604	3340			3238		1759	4889				
Flt Permitted	0.24	1.00			1.00		0.95	1.00				
Satd. Flow (perm)	410	3340			3238		1759	4889				
Peak-hour factor, PHF	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97
Adj. Flow (vph)	227	515	0	0	495	144	237	2258	186	0	0	0
RTOR Reduction (vph)	0	0	0	0	28	0	0	10	0	0	0	0
Lane Group Flow (vph)	227	515	0	0	611	0	237	2434	0	0	0	0
Confl. Peds. (#/hr)	5		5	5		5	5		5	5		5
Heavy Vehicles (%)	3%	2%	0%	0%	1%	2%	0%	2%	2%	0%	0%	0%
Bus Blockages (#/hr)	0	2	0	0	2	0	0	4	0	0	0	0
Turn Type	pm+pt	NA			NA		Perm	NA				
Protected Phases	4	8			3			2				
Permitted Phases	8						2					
Actuated Green, G (s)	42.0	41.4			23.4		44.4	44.4				
Effective Green, g (s)	41.4	40.8			22.8		43.8	43.8				
Actuated g/C Ratio	0.44	0.43			0.24		0.46	0.46				
Clearance Time (s)	4.0	4.6			4.6		4.6	4.6				
Vehicle Extension (s)	1.0	3.0			3.0		3.0	3.0				
Lane Grp Cap (vph)	347	1434			777		810	2254				
v/s Ratio Prot	c0.09	0.15			c0.19			c0.50				
v/s Ratio Perm	0.19						0.13					
v/c Ratio	0.65	0.36			0.79		0.29	1.08				
Uniform Delay, d1	28.8	18.3			33.8		15.9	25.6				
Progression Factor	1.00	1.00			1.00		1.00	1.00				
Incremental Delay, d2	3.4	0.7			7.9		0.9	44.7				
Delay (s)	32.2	19.0			41.7		16.9	70.3				
Level of Service	C	B			D		B	E				
Approach Delay (s/veh)		23.0			41.7			65.6			0.0	
Approach LOS		C			D			E			A	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	54.0	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.93		
Actuated Cycle Length (s)	95.0	Sum of lost time (s)	15.0
Intersection Capacity Utilization	93.1%	ICU Level of Service	F
Analysis Period (min)	15		
Description: date collected 12/13/2023			
c Critical Lane Group			

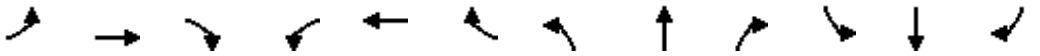
Preferred Alternative Synchro Reports



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	350	620	130	220	600	120	370	1060	210	100	1130	140
Future Volume (veh/h)	350	620	130	220	600	120	370	1060	210	100	1130	140
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.04	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.96	1.00		0.96	1.00		0.98	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1800	1744	1758	1800	1772	1843	1800	1786	1772	1772	1772	1786
Adj Flow Rate, veh/h	376	667	140	237	645	129	398	1140	226	108	1215	151
Peak Hour Factor	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93
Percent Heavy Veh, %	0	4	3	0	2	2	0	1	2	2	2	1
Cap, veh/h	314	673	141	255	722	321	301	2071	628	128	1412	175
Arrive On Green	0.18	0.25	0.24	0.15	0.21	0.21	0.18	0.42	0.42	0.08	0.32	0.32
Sat Flow, veh/h	1714	2706	567	1714	3367	1498	1714	4876	1478	1688	4346	540
Grp Volume(v), veh/h	376	408	399	237	645	129	398	1140	226	108	901	465
Grp Sat Flow(s),veh/h/ln	1714	1657	1617	1714	1683	1498	1714	1625	1478	1688	1612	1661
Q Serve(g_s), s	30.2	40.5	40.6	22.5	30.7	12.2	29.0	29.0	17.1	10.4	43.2	43.3
Cycle Q Clear(g_c), s	30.2	40.5	40.6	22.5	30.7	12.2	29.0	29.0	17.1	10.4	43.2	43.3
Prop In Lane	1.00		0.35	1.00		1.00	1.00		1.00	1.00		0.33
Lane Grp Cap(c), veh/h	314	412	402	255	722	321	301	2071	628	128	1048	540
V/C Ratio(X)	1.20	0.99	0.99	0.93	0.89	0.40	1.32	0.55	0.36	0.84	0.86	0.86
Avail Cap(c_a), veh/h	314	412	402	303	775	345	301	2071	628	215	1048	540
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	67.4	61.8	62.1	69.4	63.0	55.7	68.0	35.6	32.2	75.3	52.2	52.3
Incr Delay (d2), s/veh	115.9	41.7	42.8	31.1	12.0	0.6	165.8	1.1	1.6	13.9	9.2	16.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	23.4	21.9	21.5	12.1	14.4	4.7	26.6	11.9	6.5	5.0	18.9	20.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	183.3	103.5	104.9	100.4	75.0	56.3	233.8	36.7	33.8	89.2	61.4	68.7
LnGrp LOS	F	F	F	F	E	E	F	D	C	F	E	E
Approach Vol, veh/h		1183			1011			1764			1474	
Approach Delay, s/veh		129.3			78.6			80.8			65.7	
Approach LOS		F			E			F			E	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	16.5	74.1	35.0	39.4	33.0	57.6	29.4	45.0
Change Period (Y+Rc), s	4.0	5.0	4.4	5.4	4.0	5.0	4.4	5.4
Max Green Setting (Gmax), s	21.0	58.0	30.6	36.6	29.0	50.0	29.6	37.6
Max Q Clear Time (g_c+I1), s	12.4	31.0	32.2	32.7	31.0	45.3	24.5	42.6
Green Ext Time (p_c), s	0.2	7.9	0.0	1.2	0.0	2.8	0.4	0.0

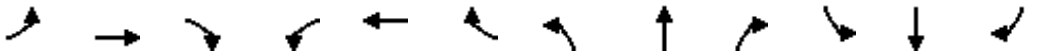
Intersection Summary	
HCM 7th Control Delay, s/veh	86.9
HCM 7th LOS	F



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	330	680	210	130	690	190	340	940	110	150	840	250
Future Volume (vph)	330	680	210	130	690	190	340	940	110	150	840	250
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	11	12	12	11	12	13	11	11	12	11	11	12
Total Lost time (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0
Lane Util. Factor	0.97	0.95	1.00	0.97	0.95	1.00	1.00	0.91	1.00	1.00	0.91	1.00
Frpb, ped/bikes	1.00	1.00	0.98	1.00	1.00	0.99	1.00	1.00	0.99	1.00	1.00	0.99
Flpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	3144	3320	1462	3113	3386	1551	1653	4657	1480	1637	4568	1521
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	3144	3320	1462	3113	3386	1551	1653	4657	1480	1637	4568	1521
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	347	716	221	137	726	200	358	989	116	158	884	263
RTOR Reduction (vph)	0	0	78	0	0	151	0	0	67	0	0	176
Lane Group Flow (vph)	347	716	143	137	726	49	358	989	49	158	884	87
Confl. Peds. (#/hr)	7		12	12		7	4		9	9		4
Heavy Vehicles (%)	2%	3%	3%	3%	1%	1%	0%	2%	2%	1%	4%	0%
Turn Type	Prot	NA	Perm	Prot	NA	Perm	Prot	NA	Perm	Prot	NA	Perm
Protected Phases	3	8		7	4		5	2		1	6	
Permitted Phases			8			4			2			6
Actuated Green, G (s)	21.8	47.8	47.8	11.7	37.9	37.9	39.1	67.7	67.7	17.6	46.2	46.2
Effective Green, g (s)	23.8	50.0	50.0	13.7	39.9	39.9	41.1	69.7	69.7	19.6	48.2	48.2
Actuated g/C Ratio	0.14	0.30	0.30	0.08	0.24	0.24	0.25	0.42	0.42	0.12	0.29	0.29
Clearance Time (s)	5.0	5.2	5.2	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0
Vehicle Extension (s)	2.0	3.0	3.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	3.0	3.0
Lane Grp Cap (vph)	453	1006	443	258	818	375	411	1967	625	194	1334	444
v/s Ratio Prot	c0.11	0.22		0.04	c0.21		c0.22	0.21		0.10	c0.19	
v/s Ratio Perm			0.10			0.03			0.03			0.06
v/c Ratio	0.77	0.71	0.32	0.53	0.89	0.13	0.87	0.50	0.08	0.81	0.66	0.20
Uniform Delay, d1	67.9	51.1	44.4	72.6	60.4	49.0	59.4	34.9	28.5	70.9	51.3	43.8
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	6.8	2.4	0.4	1.1	11.2	0.1	17.4	0.9	0.2	21.3	2.6	1.0
Delay (s)	74.8	53.5	44.8	73.6	71.5	49.0	76.8	35.9	28.7	92.3	53.9	44.8
Level of Service	E	D	D	E	E	D	E	D	C	F	D	D
Approach Delay (s/veh)		57.8			67.6			45.3			56.7	
Approach LOS		E			E			D			E	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	56.0	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	0.79		
Actuated Cycle Length (s)	165.0	Sum of lost time (s)	12.0
Intersection Capacity Utilization	93.0%	ICU Level of Service	F
Analysis Period (min)	15		
Description: date collected 12/12/2023			

c Critical Lane Group



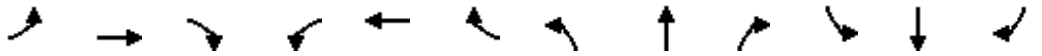
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	40	980	110	180	1380	40	410	90	140	50	60	40
Future Volume (veh/h)	40	980	110	180	1380	40	410	90	140	50	60	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.04	1.04	1.00	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.99	1.00		0.96
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1800	1772	1786	1744	1800	1800	1800	1872	1828	1800	1872	1872
Adj Flow Rate, veh/h	43	1043	117	191	1468	43	341	230	149	53	64	43
Peak Hour Factor	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94
Percent Heavy Veh, %	0	2	1	4	0	0	0	0	3	0	0	0
Cap, veh/h	186	1372	154	287	1638	48	404	249	161	139	83	56
Arrive On Green	0.05	0.45	0.44	0.09	0.48	0.47	0.24	0.24	0.22	0.08	0.08	0.06
Sat Flow, veh/h	1714	3052	342	1661	3393	99	1714	1056	684	1714	1026	690
Grp Volume(v), veh/h	43	575	585	191	739	772	341	0	379	53	0	107
Grp Sat Flow(s),veh/h/ln	1714	1683	1710	1661	1710	1782	1714	0	1740	1714	0	1716
Q Serve(g_s), s	1.4	31.4	31.5	6.5	43.3	43.5	20.9	0.0	23.4	3.2	0.0	6.7
Cycle Q Clear(g_c), s	1.4	31.4	31.5	6.5	43.3	43.5	20.9	0.0	23.4	3.2	0.0	6.7
Prop In Lane	1.00		0.20	1.00		0.06	1.00		0.39	1.00		0.40
Lane Grp Cap(c), veh/h	186	757	769	287	826	861	404	0	410	139	0	139
V/C Ratio(X)	0.23	0.76	0.76	0.66	0.89	0.90	0.85	0.00	0.93	0.38	0.00	0.77
Avail Cap(c_a), veh/h	295	757	769	439	872	909	404	0	410	139	0	139
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	22.7	25.3	25.5	21.1	25.9	26.0	40.1	0.0	41.5	48.0	0.0	49.9
Incr Delay (d2), s/veh	0.2	4.8	4.8	1.0	11.7	11.6	14.4	0.0	26.4	2.5	0.0	24.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.6	13.0	13.3	2.4	19.2	20.1	10.3	0.0	13.0	1.5	0.0	3.8
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	22.9	30.1	30.2	22.1	37.6	37.6	54.6	0.0	67.8	50.4	0.0	74.1
LnGrp LOS	C	C	C	C	D	D	D		E	D		E
Approach Vol, veh/h		1203			1702			720			160	
Approach Delay, s/veh		29.9			35.9			61.6			66.2	
Approach LOS		C			D			E			E	

Timer - Assigned Phs	2	3	4	6	7	8
Phs Duration (G+Y+Rc), s	30.0	10.0	58.0	12.0	14.0	54.1
Change Period (Y+Rc), s	6.0	4.0	6.0	5.0	4.0	6.0
Max Green Setting (Gmax), s	24.0	13.0	55.0	7.0	20.0	48.0
Max Q Clear Time (g_c+I1), s	25.4	3.4	45.5	8.7	8.5	33.5
Green Ext Time (p_c), s	0.0	0.0	6.5	0.0	0.3	6.7

Intersection Summary	
HCM 7th Control Delay, s/veh	40.1
HCM 7th LOS	D

Notes

User approved pedestrian interval to be less than phase max green.
User approved volume balancing among the lanes for turning movement.



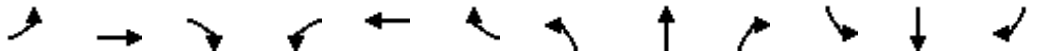
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	100	110	360	270	150	180	170	1190	270	80	1550	50
Future Volume (veh/h)	100	110	360	270	150	180	170	1190	270	80	1550	50
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		0.99	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1786	1772	1786	1772	1772	1786	1786	1744	1730	1786	1786	1772
Adj Flow Rate, veh/h	106	117	383	287	160	191	181	1266	287	85	1649	53
Peak Hour Factor	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94
Percent Heavy Veh, %	1	2	1	2	2	1	1	4	5	1	1	2
Cap, veh/h	126	499	451	244	355	400	136	1614	714	104	1561	50
Arrive On Green	0.07	0.21	0.21	0.14	0.28	0.28	0.08	0.49	0.49	0.06	0.47	0.46
Sat Flow, veh/h	1701	2374	1498	1688	1266	1424	1701	3313	1466	1701	3356	108
Grp Volume(v), veh/h	106	117	383	287	149	202	181	1266	287	85	831	871
Grp Sat Flow(s),veh/h/ln	1701	1187	1498	1688	1187	1503	1701	1657	1466	1701	1697	1767
Q Serve(g_s), s	9.3	6.2	31.6	21.8	15.6	16.8	12.0	47.7	18.8	7.4	70.0	70.0
Cycle Q Clear(g_c), s	9.3	6.2	31.6	21.8	15.6	16.8	12.0	47.7	18.8	7.4	70.0	70.0
Prop In Lane	1.00		1.00	1.00		0.95	1.00		1.00	1.00		0.06
Lane Grp Cap(c), veh/h	126	499	451	244	333	422	136	1614	714	104	789	822
V/C Ratio(X)	0.84	0.23	0.85	1.17	0.45	0.48	1.33	0.78	0.40	0.82	1.05	1.06
Avail Cap(c_a), veh/h	145	499	451	244	333	422	136	1614	714	124	789	822
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	68.8	49.4	49.5	64.4	44.5	45.2	69.2	32.0	24.6	69.8	40.3	40.3
Incr Delay (d2), s/veh	29.4	0.2	14.1	112.8	0.9	0.8	192.1	2.5	0.3	29.0	47.0	48.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	5.1	1.9	15.3	17.1	4.7	6.5	12.5	19.6	6.7	4.1	39.0	41.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	98.2	49.6	63.6	177.2	45.5	46.1	261.3	34.6	24.9	98.8	87.2	88.7
LnGrp LOS	F	D	E	F	D	D	F	C	C	F	F	F
Approach Vol, veh/h		606			638			1734			1787	
Approach Delay, s/veh		67.0			104.9			56.6			88.5	
Approach LOS		E			F			E			F	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	13.2	76.3	15.8	45.2	16.0	73.5	26.4	34.6
Change Period (Y+Rc), s	4.0	5.5	4.6	4.6	4.0	* 5.5	4.6	4.6
Max Green Setting (Gmax), s	11.0	68.5	12.8	39.0	12.0	* 68	21.8	30.0
Max Q Clear Time (g_c+I1), s	9.4	49.7	11.3	18.8	14.0	72.0	23.8	33.6
Green Ext Time (p_c), s	0.0	6.6	0.0	1.4	0.0	0.0	0.0	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	76.4
HCM 7th LOS	E

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	70	1630	80	150	1500	260	200	140	140	210	50	50
Future Volume (veh/h)	70	1630	80	150	1500	260	200	140	140	210	50	50
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1856	1856	1811	1870	1856	1885	1885	1841	1856	1841	1885
Adj Flow Rate, veh/h	72	1680	0	155	1546	0	206	144	0	216	52	52
Peak Hour Factor	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97
Percent Heavy Veh, %	2	3	3	6	2	3	1	1	4	3	4	1
Cap, veh/h	129	1461		281	1514		296	209		253	143	143
Arrive On Green	0.07	0.41	0.00	0.08	0.43	0.00	0.09	0.11	0.00	0.14	0.17	0.17
Sat Flow, veh/h	1781	3526	1572	3346	3554	1572	3483	1885	1560	1767	844	844
Grp Volume(v), veh/h	72	1680	0	155	1546	0	206	144	0	216	0	104
Grp Sat Flow(s),veh/h/ln	1781	1763	1572	1673	1777	1572	1742	1885	1560	1767	0	1687
Q Serve(g_s), s	3.7	38.8	0.0	4.2	39.9	0.0	5.4	6.9	0.0	11.2	0.0	5.1
Cycle Q Clear(g_c), s	3.7	38.8	0.0	4.2	39.9	0.0	5.4	6.9	0.0	11.2	0.0	5.1
Prop In Lane	1.00		1.00	1.00		1.00	1.00		1.00	1.00		0.50
Lane Grp Cap(c), veh/h	129	1461		281	1514		296	209		253	0	285
V/C Ratio(X)	0.56	1.15		0.55	1.02		0.70	0.69		0.85	0.00	0.36
Avail Cap(c_a), veh/h	371	1461		697	1514		725	483		368	0	432
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	42.0	27.4	0.0	41.2	26.9	0.0	41.7	40.1	0.0	39.1	0.0	34.5
Incr Delay (d2), s/veh	3.8	75.9	0.0	1.7	28.7	0.0	2.9	4.0	0.0	12.3	0.0	0.8
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.7	30.0	0.0	1.7	21.0	0.0	2.3	3.3	0.0	5.5	0.0	2.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	45.8	103.4	0.0	42.9	55.6	0.0	44.6	44.1	0.0	51.4	0.0	35.2
LnGrp LOS	D	F		D	F		D	D		D		D
Approach Vol, veh/h		1752			1701			350			320	
Approach Delay, s/veh		101.0			54.4			44.4			46.1	
Approach LOS		F			D			D			D	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	18.9	16.4	12.3	46.1	13.5	21.8	13.4	45.0
Change Period (Y+Rc), s	5.5	6.0	5.5	6.2	5.5	6.0	5.5	6.2
Max Green Setting (Gmax), s	19.5	24.0	19.5	38.8	19.5	24.0	19.5	38.8
Max Q Clear Time (g_c+I1), s	13.2	8.9	5.7	41.9	7.4	7.1	6.2	40.8
Green Ext Time (p_c), s	0.3	0.5	0.1	0.0	0.5	0.4	0.4	0.0

Intersection Summary	
HCM 7th Control Delay, s/veh	72.7
HCM 7th LOS	E

Notes

Unsignalized Delay for [NBR, EBR, WBR] is excluded from calculations of the approach delay and intersection delay.

Intersection	
Int Delay, s/veh	46

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	610	0	470	320	0	540
Future Vol, veh/h	610	0	470	320	0	540
Conflicting Peds, #/hr	0	1	1	0	2	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	75	-	-	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	93	93	93	93	93	93
Heavy Vehicles, %	1	1	1	2	1	1
Mvmt Flow	656	0	505	344	0	581

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	-	657	0	-	657
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	-	4.11	-	-	6.21
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	-	2.209	-	-	3.309
Pot Cap-1 Maneuver	-	0	935	-	0	~ 467
Stage 1	-	0	-	-	0	-
Stage 2	-	0	-	-	0	-
Platoon blocked, %	-			-		
Mov Cap-1 Maneuver	-	-	935	-	-	~ 466
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	EB	WB	NB
HCM Ctrl Dly, s/v	0	7.91	153.76
HCM LOS			F

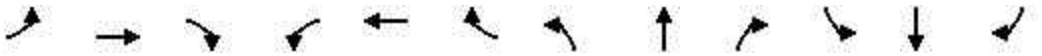
Minor Lane/Major Mvmt	NBLn1	EBT	WBL	WBT
Capacity (veh/h)	466	-	935	-
HCM Lane V/C Ratio	1.245	-	0.541	-
HCM Ctrl Dly (s/v)	153.8	-	13.3	-
HCM Lane LOS	F	-	B	-
HCM 95th %tile Q(veh)	23.5	-	3.3	-

Notes	
~: Volume exceeds capacity	$: Delay exceeds 300s
+: Computation Not Defined	*: All major volume in platoon

Existing (2024) Synchro Reports

HCM 7th Signalized Intersection Summary
2: Division St & Wellesley Ave

10/27/2025



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	260	482	138	192	557	113	315	1380	174	96	1187	121
Future Volume (veh/h)	260	482	138	192	557	113	315	1380	174	96	1187	121
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.04	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.96	1.00		0.96	1.00		0.98	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1786	1744	1758	1786	1772	1843	1786	1786	1772	1772	1772	1786
Adj Flow Rate, veh/h	286	530	152	218	633	128	339	1484	187	103	1276	130
Peak Hour Factor	0.91	0.91	0.91	0.88	0.88	0.88	0.93	0.93	0.93	0.93	0.93	0.93
Percent Heavy Veh, %	1	4	3	1	2	2	1	1	2	2	2	1
Cap, veh/h	308	634	181	244	719	320	299	2120	643	124	1480	151
Arrive On Green	0.18	0.25	0.24	0.14	0.21	0.21	0.18	0.43	0.43	0.07	0.33	0.33
Sat Flow, veh/h	1701	2521	719	1701	3367	1498	1701	4876	1479	1688	4451	453
Grp Volume(v), veh/h	286	347	335	218	633	128	339	1484	187	103	925	481
Grp Sat Flow(s),veh/h/ln	1701	1657	1583	1701	1683	1498	1701	1625	1479	1688	1612	1679
Q Serve(g_s), s	27.3	32.8	33.2	20.8	30.0	12.1	29.0	40.8	13.5	9.9	44.3	44.3
Cycle Q Clear(g_c), s	27.3	32.8	33.2	20.8	30.0	12.1	29.0	40.8	13.5	9.9	44.3	44.3
Prop In Lane	1.00		0.45	1.00		1.00	1.00		1.00	1.00		0.27
Lane Grp Cap(c), veh/h	308	416	398	244	719	320	299	2120	643	124	1073	558
V/C Ratio(X)	0.93	0.83	0.84	0.89	0.88	0.40	1.13	0.70	0.29	0.83	0.86	0.86
Avail Cap(c_a), veh/h	320	416	398	309	775	345	299	2120	643	215	1073	558
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.89	0.89	0.89
Uniform Delay (d), s/veh	66.5	58.5	59.0	69.4	62.8	55.8	68.0	37.9	30.2	75.4	51.5	51.7
Incr Delay (d2), s/veh	32.0	13.4	14.7	23.0	10.6	0.6	93.2	2.0	1.1	11.8	6.6	11.8
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	14.7	15.4	15.0	10.7	14.0	4.7	20.4	16.7	5.1	4.7	18.9	20.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	98.5	71.9	73.6	92.5	73.5	56.4	161.2	39.8	31.3	87.3	58.1	63.5
LnGrp LOS	F	E	E	F	E	E	F	D	C	F	E	E
Approach Vol, veh/h		968			979			2010			1509	
Approach Delay, s/veh		80.3			75.5			59.5			61.8	
Approach LOS		F			E			E			E	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	16.1	75.7	33.9	39.2	33.0	58.9	27.7	45.5
Change Period (Y+Rc), s	4.0	5.0	4.4	5.4	4.0	5.0	4.4	5.4
Max Green Setting (Gmax), s	21.0	58.0	30.6	36.6	29.0	50.0	29.6	37.6
Max Q Clear Time (g_c+I1), s	11.9	42.8	29.3	32.0	31.0	46.3	22.8	35.2
Green Ext Time (p_c), s	0.2	7.9	0.2	1.4	0.0	2.3	0.5	0.7

Intersection Summary	
HCM 7th Control Delay, s/veh	66.7
HCM 7th LOS	E



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	575	102	170	732	0	0	0	0	78	807	91
Future Volume (veh/h)	0	575	102	170	732	0	0	0	0	78	807	91
Initial Q (Qb), veh	0	0	0	0	0	0				0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00				1.04	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00				1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Work Zone On Approach		No			No						No	
Adj Sat Flow, veh/h/ln	0	1786	1772	1786	1786	0				1843	1843	1843
Adj Flow Rate, veh/h	0	593	105	200	861	0				83	859	97
Peak Hour Factor	0.97	0.97	0.97	0.85	0.85	0.85				0.94	0.94	0.94
Percent Heavy Veh, %	0	1	2	1	1	0				2	2	2
Cap, veh/h	0	717	127	239	1284	0				154	1592	180
Arrive On Green	0.00	0.25	0.24	0.09	0.38	0.00				0.53	0.53	0.53
Sat Flow, veh/h	0	2971	509	1701	3483	0				288	2984	337
Grp Volume(v), veh/h	0	349	349	200	861	0				526	0	513
Grp Sat Flow(s),veh/h/ln	0	1697	1694	1701	1697	0				1828	0	1781
Q Serve(g_s), s	0.0	19.4	19.5	6.0	21.1	0.0				18.9	0.0	18.9
Cycle Q Clear(g_c), s	0.0	19.4	19.5	6.0	21.1	0.0				18.9	0.0	18.9
Prop In Lane	0.00		0.30	1.00		0.00				0.16		0.19
Lane Grp Cap(c), veh/h	0	422	421	239	1284	0				975	0	950
V/C Ratio(X)	0.00	0.83	0.83	0.84	0.67	0.00				0.54	0.00	0.54
Avail Cap(c_a), veh/h	0	655	654	239	1751	0				975	0	950
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Upstream Filter(I)	0.00	0.89	0.89	0.16	0.16	0.00				1.00	0.00	1.00
Uniform Delay (d), s/veh	0.0	35.5	35.6	43.0	25.9	0.0				15.3	0.0	15.3
Incr Delay (d2), s/veh	0.0	4.5	4.7	4.4	0.1	0.0				2.1	0.0	2.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0				0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	8.4	8.5	5.1	8.3	0.0				8.0	0.0	7.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	0.0	40.1	40.3	47.4	26.0	0.0				17.4	0.0	17.5
LnGrp LOS		D	D	D	C					B		B
Approach Vol, veh/h		698			1061						1039	
Approach Delay, s/veh		40.2			30.0						17.5	
Approach LOS		D			C						B	

Timer - Assigned Phs		4		6	7	8
Phs Duration (G+Y+Rc), s		42.2		57.8	13.0	29.3
Change Period (Y+Rc), s		5.0		5.0	5.0	5.0
Max Green Setting (Gmax), s		51.0		39.0	8.0	38.0
Max Q Clear Time (g_c+I1), s		23.1		20.9	8.0	21.5
Green Ext Time (p_c), s		4.6		4.6	0.0	2.7

Intersection Summary	
HCM 7th Control Delay, s/veh	27.9
HCM 7th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	32	828	104	176	1209	31	405	83	135	47	59	30
Future Volume (veh/h)	32	828	104	176	1209	31	405	83	135	47	59	30
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.04	1.04	1.00	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.99	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1800	1772	1786	1744	1800	1800	1800	1872	1828	1800	1872	1872
Adj Flow Rate, veh/h	36	920	116	202	1390	36	325	223	141	75	94	48
Peak Hour Factor	0.90	0.90	0.90	0.87	0.87	0.87	0.96	0.96	0.96	0.63	0.63	0.63
Percent Heavy Veh, %	0	2	1	4	0	0	0	0	3	0	0	0
Cap, veh/h	176	1103	139	278	1375	36	423	263	166	218	147	75
Arrive On Green	0.06	0.37	0.35	0.10	0.40	0.39	0.25	0.25	0.23	0.13	0.13	0.11
Sat Flow, veh/h	1714	3008	379	1661	3406	88	1714	1067	675	1714	1158	591
Grp Volume(v), veh/h	36	515	521	202	697	729	325	0	364	75	0	142
Grp Sat Flow(s),veh/h/ln	1714	1683	1704	1661	1710	1784	1714	0	1742	1714	0	1750
Q Serve(g_s), s	1.3	27.7	27.8	7.3	40.1	40.1	17.5	0.0	19.8	4.0	0.0	7.7
Cycle Q Clear(g_c), s	1.3	27.7	27.8	7.3	40.1	40.1	17.5	0.0	19.8	4.0	0.0	7.7
Prop In Lane	1.00		0.22	1.00		0.05	1.00		0.39	1.00		0.34
Lane Grp Cap(c), veh/h	176	617	625	278	690	720	423	0	430	218	0	223
V/C Ratio(X)	0.20	0.83	0.83	0.73	1.01	1.01	0.77	0.00	0.85	0.34	0.00	0.64
Avail Cap(c_a), veh/h	262	685	693	296	690	720	447	0	454	292	0	298
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	23.7	28.7	28.9	21.9	29.6	29.7	34.8	0.0	36.0	39.6	0.0	41.5
Incr Delay (d2), s/veh	0.2	8.6	8.5	6.8	36.8	36.6	6.6	0.0	12.5	1.3	0.0	4.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.5	12.1	12.3	3.1	22.5	23.4	8.0	0.0	9.8	1.7	0.0	3.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	23.9	37.3	37.4	28.7	66.4	66.2	41.4	0.0	48.5	40.9	0.0	45.8
LnGrp LOS	C	D	D	C	F	F	D		D	D		D
Approach Vol, veh/h		1072			1628			689			217	
Approach Delay, s/veh		36.9			61.6			45.2			44.1	
Approach LOS		D			E			D			D	

Timer - Assigned Phs	2	3	4		6	7	8
Phs Duration (G+Y+Rc), s	28.6	10.0	45.0		15.7	14.0	41.0
Change Period (Y+Rc), s	6.0	4.0	6.0		5.0	4.0	6.0
Max Green Setting (Gmax), s	24.0	11.0	39.0		15.0	11.0	39.0
Max Q Clear Time (g_c+I1), s	21.8	3.3	42.1		9.7	9.3	29.8
Green Ext Time (p_c), s	0.6	0.0	0.0		0.6	0.1	4.5

Intersection Summary	
HCM 7th Control Delay, s/veh	50.1
HCM 7th LOS	D

Notes

User approved volume balancing among the lanes for turning movement.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	226	417	152	96	295	302	103	1152	22	183	969	33
Future Volume (veh/h)	226	417	152	96	295	302	103	1152	22	183	969	33
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.04	1.04	1.00	1.04	1.04	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		0.99	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1744	1857	1814	1786	1843	1843	1786	1758	1786	1758	1730	1786
Adj Flow Rate, veh/h	251	463	169	104	321	328	106	1188	23	189	999	34
Peak Hour Factor	0.90	0.90	0.90	0.92	0.92	0.92	0.97	0.97	0.97	0.97	0.97	0.97
Percent Heavy Veh, %	4	1	4	1	2	2	1	3	1	3	5	1
Cap, veh/h	286	772	279	266	413	364	238	1355	26	224	1412	48
Arrive On Green	0.12	0.31	0.30	0.05	0.24	0.23	0.05	0.40	0.40	0.08	0.44	0.43
Sat Flow, veh/h	1661	2522	912	1701	1751	1543	1701	3351	65	1674	3243	110
Grp Volume(v), veh/h	251	323	309	104	321	328	106	592	619	189	506	527
Grp Sat Flow(s),veh/h/ln	1661	1765	1669	1701	1751	1543	1701	1670	1746	1674	1643	1710
Q Serve(g_s), s	11.7	16.0	16.3	4.9	17.7	21.3	3.9	33.7	33.7	6.8	25.9	25.9
Cycle Q Clear(g_c), s	11.7	16.0	16.3	4.9	17.7	21.3	3.9	33.7	33.7	6.8	25.9	25.9
Prop In Lane	1.00		0.55	1.00		1.00	1.00		0.04	1.00		0.06
Lane Grp Cap(c), veh/h	286	540	511	266	413	364	238	675	706	224	715	744
V/C Ratio(X)	0.88	0.60	0.61	0.39	0.78	0.90	0.45	0.88	0.88	0.84	0.71	0.71
Avail Cap(c_a), veh/h	385	540	511	405	423	373	392	806	842	324	745	775
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	27.6	30.4	30.6	29.5	36.8	38.6	20.9	28.3	28.3	23.6	23.7	23.8
Incr Delay (d2), s/veh	13.2	1.3	1.5	0.3	7.9	23.2	0.5	9.6	9.2	8.9	3.0	2.9
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	5.6	6.9	6.7	2.0	8.4	10.3	1.5	14.6	15.2	3.0	10.2	10.5
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	40.8	31.6	32.1	29.9	44.7	61.8	21.4	37.9	37.6	32.5	26.8	26.7
LnGrp LOS	D	C	C	C	D	E	C	D	D	C	C	C
Approach Vol, veh/h		883			753			1317			1222	
Approach Delay, s/veh		34.4			50.1			36.4			27.6	
Approach LOS		C			D			D			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	11.8	46.0	16.8	28.4	8.7	49.2	9.6	35.6
Change Period (Y+Rc), s	3.0	5.2	3.0	4.9	3.0	5.2	3.0	4.9
Max Green Setting (Gmax), s	15.0	48.8	20.0	24.1	15.0	45.8	15.0	22.1
Max Q Clear Time (g_c+I1), s	8.8	35.7	13.7	23.3	5.9	27.9	6.9	18.3
Green Ext Time (p_c), s	0.1	5.1	0.1	0.2	0.0	4.8	0.0	0.7

Intersection Summary	
HCM 7th Control Delay, s/veh	35.9
HCM 7th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	60	164	0	0	278	158	98	2293	121	0	0	0
Future Volume (veh/h)	60	164	0	0	278	158	98	2293	121	0	0	0
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0			
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		0.98	1.00		1.00			
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Work Zone On Approach		No			No			No				
Adj Sat Flow, veh/h/ln	1744	1702	0	0	1786	1772	1786	1772	1702			
Adj Flow Rate, veh/h	61	167	0	0	327	186	104	2439	129			
Peak Hour Factor	0.98	0.98	0.98	0.85	0.85	0.85	0.94	0.94	0.94			
Percent Heavy Veh, %	4	7	0	0	1	2	1	2	7			
Cap, veh/h	153	463	0	0	342	282	135	3148	165			
Arrive On Green	0.05	0.27	0.00	0.00	0.19	0.19	0.68	0.68	0.67			
Sat Flow, veh/h	1661	1702	0	0	1786	1474	199	4659	244			
Grp Volume(v), veh/h	61	167	0	0	327	186	920	838	914			
Grp Sat Flow(s),veh/h/ln	1661	1702	0	0	1786	1474	1762	1612	1727			
Q Serve(g_s), s	0.0	9.1	0.0	0.0	20.8	13.4	40.7	40.4	42.0			
Cycle Q Clear(g_c), s	0.0	9.1	0.0	0.0	20.8	13.4	40.7	40.4	42.0			
Prop In Lane	1.00		0.00	0.00		1.00	0.11		0.14			
Lane Grp Cap(c), veh/h	153	463	0	0	342	282	1191	1090	1167			
V/C Ratio(X)	0.40	0.36	0.00	0.00	0.96	0.66	0.77	0.77	0.78			
Avail Cap(c_a), veh/h	178	488	0	0	342	282	1191	1090	1167			
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Upstream Filter(I)	0.69	0.69	0.00	0.00	0.69	0.69	1.00	1.00	1.00			
Uniform Delay (d), s/veh	51.4	33.8	0.0	0.0	46.0	43.0	12.6	12.6	12.9			
Incr Delay (d2), s/veh	1.6	0.5	0.0	0.0	29.9	4.4	4.9	5.2	5.3			
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
%ile BackOfQ(50%),veh/ln	1.7	3.8	0.0	0.0	12.0	5.2	16.0	14.6	16.3			
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	53.0	34.2	0.0	0.0	75.9	47.4	17.5	17.8	18.2			
LnGrp LOS	D	C			E	D	B	B	B			
Approach Vol, veh/h		228			513			2672				
Approach Delay, s/veh		39.3			65.6			17.9				
Approach LOS		D			E			B				

Timer - Assigned Phs	2	3	4			8
Phs Duration (G+Y+Rc), s	80.7	9.3	25.0			34.3
Change Period (Y+Rc), s	5.0	5.0	5.0			5.0
Max Green Setting (Gmax), s	74.0	6.0	20.0			31.0
Max Q Clear Time (g_c+I1), s	44.0	2.0	22.8			11.1
Green Ext Time (p_c), s	10.6	0.1	0.0			0.8

Intersection Summary	
HCM 7th Control Delay, s/veh	26.5
HCM 7th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	89	60	272	244	108	152	103	1162	234	76	1220	42
Future Volume (veh/h)	89	60	272	244	108	152	103	1162	234	76	1220	42
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		0.99	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1786	1772	1786	1772	1772	1786	1786	1744	1730	1786	1786	1772
Adj Flow Rate, veh/h	111	75	340	290	129	181	107	1210	244	80	1284	44
Peak Hour Factor	0.80	0.80	0.80	0.84	0.84	0.84	0.96	0.96	0.96	0.95	0.95	0.95
Percent Heavy Veh, %	1	2	1	2	2	1	1	4	5	1	1	2
Cap, veh/h	134	629	398	318	445	559	137	1211	536	101	1140	39
Arrive On Green	0.08	0.27	0.27	0.19	0.37	0.37	0.08	0.37	0.37	0.06	0.34	0.33
Sat Flow, veh/h	1701	2374	1502	1688	1187	1493	1701	3313	1466	1701	3347	115
Grp Volume(v), veh/h	111	75	340	290	129	181	107	1210	244	80	650	678
Grp Sat Flow(s),veh/h/ln	1701	1187	1502	1688	1187	1493	1701	1657	1466	1701	1697	1765
Q Serve(g_s), s	7.7	2.9	25.9	20.3	9.2	10.4	7.4	43.9	15.2	5.6	41.0	41.0
Cycle Q Clear(g_c), s	7.7	2.9	25.9	20.3	9.2	10.4	7.4	43.9	15.2	5.6	41.0	41.0
Prop In Lane	1.00		1.00	1.00		1.00	1.00		1.00	1.00		0.06
Lane Grp Cap(c), veh/h	134	629	398	318	445	559	137	1211	536	101	578	601
V/C Ratio(X)	0.83	0.12	0.85	0.91	0.29	0.32	0.78	1.00	0.46	0.79	1.13	1.13
Avail Cap(c_a), veh/h	147	722	457	356	445	559	438	1211	536	226	578	601
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	54.6	33.6	42.0	47.8	26.4	27.0	54.3	38.2	29.1	55.8	39.7	39.7
Incr Delay (d2), s/veh	27.6	0.1	13.2	25.7	0.4	0.3	13.0	25.7	0.4	12.6	76.8	76.8
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.3	0.8	11.0	10.8	2.7	3.8	3.7	21.8	5.4	2.8	29.1	30.3
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	82.2	33.6	55.2	73.5	26.8	27.4	67.3	63.8	29.5	68.5	116.5	116.6
LnGrp LOS	F	C	E	E	C	C	E	E	C	E	F	F
Approach Vol, veh/h		526			600			1561			1408	
Approach Delay, s/veh		57.8			49.6			58.7			113.8	
Approach LOS		E			D			E			F	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	11.2	47.0	14.1	48.1	13.7	44.5	27.3	34.9
Change Period (Y+Rc), s	4.0	5.5	4.6	4.6	4.0	* 5.5	4.6	4.6
Max Green Setting (Gmax), s	16.0	37.0	10.4	28.0	31.0	* 39	25.4	35.0
Max Q Clear Time (g_c+I1), s	7.6	45.9	9.7	12.4	9.4	43.0	22.3	27.9
Green Ext Time (p_c), s	0.1	0.0	0.0	1.1	0.5	0.0	0.4	1.1

Intersection Summary	
HCM 7th Control Delay, s/veh	76.2
HCM 7th LOS	E

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	116	547	121	130	546	135	91	1206	61	103	987	38
Future Volume (veh/h)	116	547	121	130	546	135	91	1206	61	103	987	38
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.97	1.00		0.97	1.00		0.99	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1744	1758	1772	1786	1772	1786	1786	1758	1702	1758	1772	1646
Adj Flow Rate, veh/h	145	622	138	134	563	139	95	1256	64	110	1050	40
Peak Hour Factor	0.88	0.88	0.88	0.97	0.97	0.97	0.96	0.96	0.96	0.94	0.94	0.94
Percent Heavy Veh, %	4	3	2	1	2	1	1	3	7	3	2	11
Cap, veh/h	273	721	160	256	699	172	336	1554	79	272	1592	61
Arrive On Green	0.10	0.27	0.25	0.10	0.26	0.25	0.09	0.48	0.46	0.09	0.48	0.47
Sat Flow, veh/h	1661	2702	598	1701	2661	654	1701	3233	165	1674	3304	126
Grp Volume(v), veh/h	145	384	376	134	355	347	95	648	672	110	535	555
Grp Sat Flow(s),veh/h/ln	1661	1670	1630	1701	1683	1632	1701	1670	1727	1674	1683	1747
Q Serve(g_s), s	7.3	26.3	26.4	6.6	23.7	23.9	3.1	39.5	39.7	3.6	29.0	29.0
Cycle Q Clear(g_c), s	7.3	26.3	26.4	6.6	23.7	23.9	3.1	39.5	39.7	3.6	29.0	29.0
Prop In Lane	1.00		0.37	1.00		0.40	1.00		0.10	1.00		0.07
Lane Grp Cap(c), veh/h	273	446	435	256	442	429	336	803	830	272	811	841
V/C Ratio(X)	0.53	0.86	0.86	0.52	0.80	0.81	0.28	0.81	0.81	0.40	0.66	0.66
Avail Cap(c_a), veh/h	273	459	448	263	463	449	355	803	830	289	811	841
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.39	0.39	0.39	0.52	0.52	0.52	0.62	0.62	0.62
Uniform Delay (d), s/veh	29.4	41.9	42.3	30.2	41.3	41.8	16.0	26.5	26.6	20.8	23.6	23.7
Incr Delay (d2), s/veh	2.0	15.0	15.7	0.7	3.9	4.2	0.2	4.6	4.5	0.6	1.2	1.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.0	12.6	12.5	2.7	10.3	10.1	1.2	16.3	17.0	1.4	11.6	12.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	31.4	56.9	57.9	30.9	45.3	46.0	16.3	31.1	31.1	21.4	24.9	24.9
LnGrp LOS	C	E	E	C	D	D	B	C	C	C	C	C
Approach Vol, veh/h		905			836			1415			1200	
Approach Delay, s/veh		53.2			43.3			30.1			24.6	
Approach LOS		D			D			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	12.8	59.7	14.0	33.5	12.7	59.8	13.5	34.0
Change Period (Y+Rc), s	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0
Max Green Setting (Gmax), s	9.0	52.0	9.0	30.0	9.0	52.0	9.0	30.0
Max Q Clear Time (g_c+I1), s	5.6	41.7	9.3	25.9	5.1	31.0	8.6	28.4
Green Ext Time (p_c), s	0.1	4.7	0.0	1.3	0.1	5.0	0.0	0.6

Intersection Summary	
HCM 7th Control Delay, s/veh	35.9
HCM 7th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	485	69	207	364	0	0	0	0	107	1471	96
Future Volume (veh/h)	0	485	69	207	364	0	0	0	0	107	1471	96
Initial Q (Qb), veh	0	0	0	0	0	0				0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00				1.04	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		0.96	1.00		1.00				1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Work Zone On Approach		No			No						No	
Adj Sat Flow, veh/h/ln	0	1772	1786	1786	1772	0				1857	1843	1843
Adj Flow Rate, veh/h	0	495	70	227	400	0				108	1486	97
Peak Hour Factor	0.98	0.98	0.98	0.91	0.91	0.91				0.99	0.99	0.99
Percent Heavy Veh, %	0	2	1	1	2	0				1	2	2
Cap, veh/h	0	592	83	269	1181	0				244	3358	219
Arrive On Green	0.00	0.20	0.19	0.11	0.35	0.00				0.56	0.56	0.56
Sat Flow, veh/h	0	3035	414	1701	3455	0				432	5943	388
Grp Volume(v), veh/h	0	282	283	227	400	0				455	792	443
Grp Sat Flow(s),veh/h/ln	0	1683	1677	1701	1683	0				1821	1585	1772
Q Serve(g_s), s	0.0	15.3	15.4	7.6	8.3	0.0				13.8	13.8	13.8
Cycle Q Clear(g_c), s	0.0	15.3	15.4	7.6	8.3	0.0				13.8	13.8	13.8
Prop In Lane	0.00		0.25	1.00		0.00				0.24		0.22
Lane Grp Cap(c), veh/h	0	338	337	269	1181	0				1029	1791	1001
V/C Ratio(X)	0.00	0.83	0.84	0.85	0.34	0.00				0.44	0.44	0.44
Avail Cap(c_a), veh/h	0	443	441	293	1418	0				1029	1791	1001
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Upstream Filter(I)	0.00	1.00	1.00	0.65	0.65	0.00				1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	36.4	36.6	39.7	22.7	0.0				12.0	12.0	12.0
Incr Delay (d2), s/veh	0.0	7.9	8.6	12.6	0.0	0.0				1.4	0.8	1.4
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0				0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	6.9	7.0	6.0	3.2	0.0				5.6	4.7	5.5
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	0.0	44.3	45.1	52.3	22.8	0.0				13.4	12.8	13.5
LnGrp LOS		D	D	D	C					B	B	B
Approach Vol, veh/h		565			627						1691	
Approach Delay, s/veh		44.7			33.5						13.1	
Approach LOS		D			C						B	

Timer - Assigned Phs	2	3	4			8
Phs Duration (G+Y+Rc), s	57.7	14.2	23.1			37.3
Change Period (Y+Rc), s	4.6	4.6	* 4.6			4.6
Max Green Setting (Gmax), s	46.4	11.0	* 24			39.4
Max Q Clear Time (g_c+I1), s	15.8	9.6	17.4			10.3
Green Ext Time (p_c), s	0.6	0.1	0.1			0.2

Intersection Summary	
HCM 7th Control Delay, s/veh	23.7
HCM 7th LOS	C

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	192	593	205	56	501	92	207	279	34	150	424	150
Future Volume (veh/h)	192	593	205	56	501	92	207	279	34	150	424	150
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	0.99		0.96	0.99		0.97	1.00		0.99	0.99		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1772	1786	1772	1744	1800	1800	1772	1786	1716	1800	1786	1786
Adj Flow Rate, veh/h	206	638	220	60	533	98	213	288	35	161	456	161
Peak Hour Factor	0.93	0.93	0.93	0.94	0.94	0.94	0.97	0.97	0.97	0.93	0.93	0.93
Percent Heavy Veh, %	2	1	2	4	0	0	2	1	6	0	1	1
Cap, veh/h	354	833	287	246	867	159	332	817	99	457	605	212
Arrive On Green	0.10	0.34	0.33	0.06	0.30	0.29	0.11	0.31	0.31	0.08	0.29	0.28
Sat Flow, veh/h	1688	2445	842	1661	2868	525	1688	2608	315	1714	2104	738
Grp Volume(v), veh/h	206	443	415	60	317	314	213	131	192	161	258	359
Grp Sat Flow(s),veh/h/ln	1688	1697	1590	1661	1710	1683	1688	1197	1726	1714	1197	1646
Q Serve(g_s), s	6.6	18.6	18.7	2.0	12.7	12.8	7.2	6.8	6.9	5.4	15.7	15.9
Cycle Q Clear(g_c), s	6.6	18.6	18.7	2.0	12.7	12.8	7.2	6.8	6.9	5.4	15.7	15.9
Prop In Lane	1.00		0.53	1.00		0.31	1.00		0.18	1.00		0.45
Lane Grp Cap(c), veh/h	354	578	542	246	517	509	332	375	541	457	344	473
V/C Ratio(X)	0.58	0.77	0.77	0.24	0.61	0.62	0.64	0.35	0.35	0.35	0.75	0.76
Avail Cap(c_a), veh/h	524	658	616	477	663	653	694	464	669	869	464	638
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	17.9	23.5	23.7	19.6	23.9	24.0	19.8	21.2	21.3	18.7	25.9	26.1
Incr Delay (d2), s/veh	1.5	5.3	5.7	0.5	1.7	1.7	2.1	0.8	0.6	0.5	5.8	4.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.6	7.9	7.5	0.8	5.2	5.1	2.8	1.9	2.8	2.1	4.8	6.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	19.4	28.8	29.4	20.1	25.6	25.8	21.9	22.0	21.8	19.1	31.6	30.6
LnGrp LOS	B	C	C	C	C	C	C	C	C	B	C	C
Approach Vol, veh/h		1064			691			536			778	
Approach Delay, s/veh		27.2			25.2			21.9			28.6	
Approach LOS		C			C			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	10.8	29.1	12.0	28.2	12.8	27.0	8.9	31.2
Change Period (Y+Rc), s	3.0	4.6	3.0	4.6	3.0	4.6	3.0	4.6
Max Green Setting (Gmax), s	7.8	30.4	17.0	30.4	27.0	30.4	17.0	30.4
Max Q Clear Time (g_c+I1), s	17.4	8.9	8.6	14.8	9.2	17.9	4.0	20.7
Green Ext Time (p_c), s	0.5	1.9	0.5	3.6	0.7	3.2	0.1	4.0

Intersection Summary	
HCM 7th Control Delay, s/veh	26.2
HCM 7th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	53	489	145	194	410	223	159	213	115	332	450	36
Future Volume (veh/h)	53	489	145	194	410	223	159	213	115	332	450	36
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		0.98	0.99		0.98	0.99		0.99
Parking Bus, Adj	1.00	1.00	0.99	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1772	1786	1800	1772	1800	1786	1772	1786	1716	1800	1800	1800
Adj Flow Rate, veh/h	56	515	153	204	432	235	179	239	129	349	474	38
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.89	0.89	0.89	0.95	0.95	0.95
Percent Heavy Veh, %	2	1	0	2	0	1	2	1	6	0	0	0
Cap, veh/h	347	713	211	320	1084	472	408	520	270	506	1015	81
Arrive On Green	0.06	0.28	0.27	0.10	0.32	0.32	0.10	0.24	0.23	0.17	0.32	0.31
Sat Flow, veh/h	1688	2569	759	1688	3420	1490	1688	2144	1112	1714	3203	256
Grp Volume(v), veh/h	56	339	329	204	432	235	179	187	181	349	252	260
Grp Sat Flow(s),veh/h/ln	1688	1697	1632	1688	1710	1490	1688	1697	1560	1714	1710	1749
Q Serve(g_s), s	1.8	13.8	13.9	6.5	7.5	9.7	6.2	7.2	7.6	11.4	9.0	9.1
Cycle Q Clear(g_c), s	1.8	13.8	13.9	6.5	7.5	9.7	6.2	7.2	7.6	11.4	9.0	9.1
Prop In Lane	1.00		0.47	1.00		1.00	1.00		0.71	1.00		0.15
Lane Grp Cap(c), veh/h	347	471	453	320	1084	472	408	411	378	506	542	554
V/C Ratio(X)	0.16	0.72	0.73	0.64	0.40	0.50	0.44	0.45	0.48	0.69	0.47	0.47
Avail Cap(c_a), veh/h	600	712	685	505	1436	626	646	801	737	622	808	826
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	18.6	24.9	25.1	18.8	20.4	21.1	20.1	24.6	25.0	17.3	20.9	20.9
Incr Delay (d2), s/veh	0.1	3.0	3.2	0.8	0.3	1.2	0.3	1.1	1.3	1.5	0.9	0.9
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.7	5.6	5.5	2.4	2.9	3.4	2.3	2.9	2.9	4.4	3.6	3.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	18.7	27.8	28.2	19.6	20.7	22.3	20.4	25.7	26.3	18.8	21.8	21.8
LnGrp LOS	B	C	C	B	C	C	C	C	C	B	C	C
Approach Vol, veh/h		724			871			547			861	
Approach Delay, s/veh		27.3			20.9			24.1			20.6	
Approach LOS		C			C			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	16.8	22.6	8.6	28.2	11.3	28.1	11.6	25.2
Change Period (Y+Rc), s	3.0	* 4.8	3.0	* 4.7	3.0	4.8	3.0	4.7
Max Green Setting (Gmax), s	13.8	* 35	17.0	* 31	19.0	35.2	17.0	31.3
Max Q Clear Time (g_c+I1), s	13.4	9.6	3.8	11.7	8.2	11.1	8.5	15.9
Green Ext Time (p_c), s	0.4	2.3	0.1	4.5	0.3	3.2	0.3	3.8

Intersection Summary	
HCM 7th Control Delay, s/veh	22.9
HCM 7th LOS	C

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	100	545	10	6	321	162	7	41	5	225	73	51
Future Volume (veh/h)	100	545	10	6	321	162	7	41	5	225	73	51
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.04	1.04	1.04	1.04	1.04	1.04
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		0.97	0.99		0.99	0.99		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1730	1744	1800	1800	1772	1786	1872	1784	1711	1843	1872	1814
Adj Flow Rate, veh/h	102	556	10	7	373	188	11	62	8	292	95	66
Peak Hour Factor	0.98	0.98	0.98	0.86	0.86	0.86	0.66	0.66	0.66	0.77	0.77	0.77
Percent Heavy Veh, %	5	4	0	0	2	1	0	6	11	2	0	4
Cap, veh/h	440	1021	18	448	612	308	322	413	53	399	273	190
Arrive On Green	0.06	0.60	0.59	0.02	0.56	0.55	0.27	0.27	0.26	0.27	0.27	0.26
Sat Flow, veh/h	1647	1707	31	1714	1097	553	1284	1546	199	1369	1022	710
Grp Volume(v), veh/h	102	0	566	7	0	561	11	0	70	292	0	161
Grp Sat Flow(s),veh/h/ln	1647	0	1738	1714	0	1650	1284	0	1745	1369	0	1733
Q Serve(g_s), s	2.3	0.0	18.5	0.2	0.0	21.7	0.7	0.0	2.9	19.7	0.0	7.2
Cycle Q Clear(g_c), s	2.3	0.0	18.5	0.2	0.0	21.7	7.8	0.0	2.9	22.6	0.0	7.2
Prop In Lane	1.00		0.02	1.00		0.34	1.00		0.11	1.00		0.41
Lane Grp Cap(c), veh/h	440	0	1039	448	0	920	322	0	466	399	0	463
V/C Ratio(X)	0.23	0.00	0.54	0.02	0.00	0.61	0.03	0.00	0.15	0.73	0.00	0.35
Avail Cap(c_a), veh/h	636	0	1039	721	0	920	331	0	478	409	0	474
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	0.81	0.00	0.81
Uniform Delay (d), s/veh	10.2	0.0	11.4	9.8	0.0	14.2	31.3	0.0	26.6	35.2	0.0	28.2
Incr Delay (d2), s/veh	0.3	0.0	2.1	0.0	0.0	3.0	0.0	0.0	0.1	5.3	0.0	0.4
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.8	0.0	7.1	0.1	0.0	8.3	0.2	0.0	1.2	7.0	0.0	3.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	10.4	0.0	13.5	9.9	0.0	17.2	31.3	0.0	26.8	40.5	0.0	28.6
LnGrp LOS	B		B	A		B	C		C	D		C
Approach Vol, veh/h		668			568			81			453	
Approach Delay, s/veh		13.0			17.1			27.4			36.3	
Approach LOS		B			B			C			D	

Timer - Assigned Phs	2	3	4		6	7	8
Phs Duration (G+Y+Rc), s	29.4	8.7	57.0		29.4	4.8	60.8
Change Period (Y+Rc), s	4.6	4.0	4.6		4.6	4.0	4.6
Max Green Setting (Gmax), s	25.4	16.0	40.4		25.4	16.0	40.4
Max Q Clear Time (g_c+I1), s	9.8	4.3	23.7		24.6	2.2	20.5
Green Ext Time (p_c), s	0.2	0.2	2.5		0.2	0.0	2.4

Intersection Summary	
HCM 7th Control Delay, s/veh	20.9
HCM 7th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	777	106	0	0	0	0	0	0	235	1324	0
Future Volume (veh/h)	0	777	106	0	0	0	0	0	0	235	1324	0
Initial Q (Qb), veh	0	0	0							0	0	0
Lane Width Adj.	1.00	1.00	1.00							1.04	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		0.99							1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00							1.00	1.00	1.00
Work Zone On Approach		No									No	
Adj Sat Flow, veh/h/ln	0	1595	1595							1619	1557	0
Adj Flow Rate, veh/h	0	785	107							250	1409	0
Peak Hour Factor	0.99	0.99	0.99							0.94	0.94	0.94
Percent Heavy Veh, %	0	2	2							5	5	0
Cap, veh/h	0	1597	216							427	2408	0
Arrive On Green	0.00	0.41	0.41							0.51	0.51	0.00
Sat Flow, veh/h	0	4015	524							833	4916	0
Grp Volume(v), veh/h	0	587	305							455	1204	0
Grp Sat Flow(s),veh/h/ln	0	1451	1493							1515	1339	0
Q Serve(g_s), s	0.0	11.9	12.1							16.7	16.7	0.0
Cycle Q Clear(g_c), s	0.0	11.9	12.1							16.7	16.7	0.0
Prop In Lane	0.00		0.35							0.55		0.00
Lane Grp Cap(c), veh/h	0	1197	616							777	2059	0
V/C Ratio(X)	0.00	0.49	0.50							0.59	0.59	0.00
Avail Cap(c_a), veh/h	0	1197	616							777	2059	0
HCM Platoon Ratio	1.00	1.00	1.00							1.00	1.00	1.00
Upstream Filter(I)	0.00	0.98	0.98							0.76	0.76	0.00
Uniform Delay (d), s/veh	0.0	17.3	17.4							13.6	13.6	0.0
Incr Delay (d2), s/veh	0.0	1.4	2.8							2.5	0.9	0.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0							0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	4.0	4.4							5.7	4.7	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	0.0	18.7	20.2							16.0	14.5	0.0
LnGrp LOS		B	C							B	B	
Approach Vol, veh/h		892									1659	
Approach Delay, s/veh		19.2									14.9	
Approach LOS		B									B	

Timer - Assigned Phs	2	4
Phs Duration (G+Y+Rc), s	44.0	36.0
Change Period (Y+Rc), s	4.6	4.6
Max Green Setting (Gmax), s	39.4	31.4
Max Q Clear Time (g_c+I1), s	18.7	14.1
Green Ext Time (p_c), s	0.8	0.4

Intersection Summary	
HCM 7th Control Delay, s/veh	16.4
HCM 7th LOS	B



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	40	678	84	126	643	110	45	110	186	163	222	61
Future Volume (veh/h)	40	678	84	126	643	110	45	110	186	163	222	61
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.99	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1716	1758	1800	1786	1772	1688	1660	1716	1786	1758	1744	1772
Adj Flow Rate, veh/h	44	753	93	131	670	115	47	116	196	183	249	69
Peak Hour Factor	0.90	0.90	0.90	0.96	0.96	0.96	0.95	0.95	0.95	0.89	0.89	0.89
Percent Heavy Veh, %	6	3	0	1	2	8	10	6	1	3	4	2
Cap, veh/h	364	1599	197	366	1582	271	79	194	233	220	298	83
Arrive On Green	0.03	0.53	0.53	0.05	0.55	0.55	0.16	0.16	0.16	0.18	0.18	0.18
Sat Flow, veh/h	1634	2990	369	1701	2872	492	488	1204	1443	1222	1659	459
Grp Volume(v), veh/h	44	420	426	131	392	393	163	0	196	252	0	249
Grp Sat Flow(s),veh/h/ln	1634	1670	1689	1701	1683	1681	1691	0	1443	1683	0	1657
Q Serve(g_s), s	2.0	25.5	25.6	5.7	22.3	22.4	14.6	0.0	21.5	23.5	0.0	23.6
Cycle Q Clear(g_c), s	2.0	25.5	25.6	5.7	22.3	22.4	14.6	0.0	21.5	23.5	0.0	23.6
Prop In Lane	1.00		0.22	1.00		0.29	0.29		1.00	0.73		0.28
Lane Grp Cap(c), veh/h	364	893	903	366	927	926	273	0	233	303	0	298
V/C Ratio(X)	0.12	0.47	0.47	0.36	0.42	0.42	0.60	0.00	0.84	0.83	0.00	0.84
Avail Cap(c_a), veh/h	483	893	903	462	927	926	432	0	368	537	0	529
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.81	0.81	0.81	1.00	1.00	1.00	1.00	0.00	1.00	0.96	0.00	0.96
Uniform Delay (d), s/veh	17.9	23.6	23.7	18.3	21.4	21.5	63.4	0.0	66.3	64.5	0.0	64.6
Incr Delay (d2), s/veh	0.0	0.4	0.4	0.2	1.4	1.4	1.6	0.0	8.0	5.7	0.0	5.9
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.8	10.2	10.4	2.3	9.2	9.2	6.4	0.0	8.5	10.6	0.0	10.5
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	17.9	24.0	24.1	18.5	22.8	23.0	65.0	0.0	74.3	70.2	0.0	70.5
LnGrp LOS	B	C	C	B	C	C	E		E	E		E
Approach Vol, veh/h		890			916			359			501	
Approach Delay, s/veh		23.8			22.3			70.1			70.3	
Approach LOS		C			C			E			E	

Timer - Assigned Phs	2	3	4	6	7	8
Phs Duration (G+Y+Rc), s	29.7	8.2	92.8	32.3	10.8	90.2
Change Period (Y+Rc), s	5.0	3.0	4.9	4.6	3.0	4.9
Max Green Setting (Gmax), s	40.0	17.0	38.1	50.4	17.0	38.1
Max Q Clear Time (g_c+I1), s	23.5	4.0	24.4	25.6	7.7	27.6
Green Ext Time (p_c), s	1.1	0.0	4.2	2.1	0.2	3.9

Intersection Summary	
HCM 7th Control Delay, s/veh	38.2
HCM 7th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	52	692	130	143	668	160	167	261	119	138	206	62
Future Volume (veh/h)	52	692	130	143	668	160	167	261	119	138	206	62
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1744	1772	1744	1716	1786	1786	1772	1758	1702	1744	1758	1786
Adj Flow Rate, veh/h	53	706	133	162	759	0	206	322	147	168	251	76
Peak Hour Factor	0.98	0.98	0.98	0.88	0.88	0.88	0.81	0.81	0.81	0.82	0.82	0.82
Percent Heavy Veh, %	4	2	4	6	1	1	2	3	7	4	3	1
Cap, veh/h	214	889	388	255	1053		277	858	384	156	984	291
Arrive On Green	0.04	0.26	0.26	0.09	0.31	0.00	0.08	0.38	0.38	0.09	0.39	0.39
Sat Flow, veh/h	1661	3367	1471	1634	3393	1514	3274	2243	1003	1661	2540	752
Grp Volume(v), veh/h	53	706	133	162	759	0	206	238	231	168	163	164
Grp Sat Flow(s),veh/h/ln	1661	1683	1471	1634	1697	1514	1637	1670	1576	1661	1670	1621
Q Serve(g_s), s	2.6	21.8	8.2	7.7	22.2	0.0	6.9	11.5	11.9	10.5	7.4	7.7
Cycle Q Clear(g_c), s	2.6	21.8	8.2	7.7	22.2	0.0	6.9	11.5	11.9	10.5	7.4	7.7
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.64	1.00		0.46
Lane Grp Cap(c), veh/h	214	889	388	255	1053		277	639	603	156	647	628
V/C Ratio(X)	0.25	0.79	0.34	0.64	0.72		0.74	0.37	0.38	1.08	0.25	0.26
Avail Cap(c_a), veh/h	379	1195	522	488	1295		732	639	603	156	647	628
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	29.1	38.3	33.3	27.9	34.3	0.0	50.0	24.9	25.0	50.7	23.3	23.3
Incr Delay (d2), s/veh	0.6	2.7	0.5	2.6	1.5	0.0	4.0	1.7	1.8	94.3	0.9	1.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.0	9.2	2.9	3.1	9.2	0.0	3.0	4.8	4.7	8.4	3.0	3.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	29.7	41.1	33.8	30.6	35.8	0.0	54.0	26.5	26.8	145.0	24.2	24.4
LnGrp LOS	C	D	C	C	D		D	C	C	F	C	C
Approach Vol, veh/h		892			921			675			495	
Approach Delay, s/veh		39.3			34.9			35.0			65.3	
Approach LOS		D			C			D			E	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.0	34.8	15.0	48.0	8.8	40.0	14.5	48.5
Change Period (Y+Rc), s	4.0	5.3	4.5	5.2	4.0	5.3	5.0	* 5.2
Max Green Setting (Gmax), s	26.0	39.7	10.5	42.8	16.0	42.7	25.0	* 35
Max Q Clear Time (g_c+I1), s	9.7	23.8	12.5	13.9	4.6	24.2	8.9	9.7
Green Ext Time (p_c), s	0.4	4.7	0.0	3.1	0.1	4.9	0.6	1.9

Intersection Summary	
HCM 7th Control Delay, s/veh	41.3
HCM 7th LOS	D

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.
Unsignalized Delay for [WBR] is excluded from calculations of the approach delay and intersection delay.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	269	259	44	321	112	244	64	799	154	195	781	15
Future Volume (veh/h)	269	259	44	321	112	244	64	799	154	195	781	15
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.04	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.99	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.99
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1786	1772	1786	1772	1786	1857	1772	1772	1772	1772	1772	1786
Adj Flow Rate, veh/h	212	410	0	230	274	0	69	859	166	201	805	15
Peak Hour Factor	0.90	0.90	0.90	0.94	0.94	0.94	0.93	0.93	0.93	0.97	0.97	0.97
Percent Heavy Veh, %	1	2	1	2	1	1	2	2	2	2	2	1
Cap, veh/h	283	589		317	335		105	1164	516	198	1351	25
Arrive On Green	0.17	0.17	0.00	0.19	0.19	0.00	0.06	0.35	0.35	0.12	0.40	0.38
Sat Flow, veh/h	1701	3544	0	1688	1786	1574	1688	3367	1491	1688	3367	63
Grp Volume(v), veh/h	212	410	0	230	274	0	69	859	166	201	402	418
Grp Sat Flow(s),veh/h/ln	1701	1772	0	1688	1786	1574	1688	1683	1491	1688	1683	1746
Q Serve(g_s), s	11.3	10.4	0.0	12.2	14.0	0.0	3.8	21.3	7.8	11.2	17.9	17.9
Cycle Q Clear(g_c), s	11.3	10.4	0.0	12.2	14.0	0.0	3.8	21.3	7.8	11.2	17.9	17.9
Prop In Lane	1.00		0.00	1.00		1.00	1.00		1.00	1.00		0.04
Lane Grp Cap(c), veh/h	283	589		317	335		105	1164	516	198	676	701
V/C Ratio(X)	0.75	0.70		0.73	0.82		0.66	0.74	0.32	1.01	0.60	0.60
Avail Cap(c_a), veh/h	423	882		420	444		198	1556	689	198	778	807
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	37.8	37.4	0.0	36.4	37.1	0.0	43.7	27.4	22.9	42.0	22.4	22.4
Incr Delay (d2), s/veh	1.5	0.6	0.0	2.5	6.6	0.0	2.6	1.9	0.6	67.2	1.5	1.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.8	4.5	0.0	5.2	6.6	0.0	1.6	8.2	2.7	8.2	6.8	7.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	39.3	38.0	0.0	38.9	43.7	0.0	46.3	29.2	23.5	109.2	23.9	23.9
LnGrp LOS	D	D		D	D		D	C	C	F	C	C
Approach Vol, veh/h		622			504			1094			1021	
Approach Delay, s/veh		38.5			41.5			29.4			40.7	
Approach LOS		D			D			C			D	

Timer - Assigned Phs	1	2		4	5	6		8
Phs Duration (G+Y+Rc), s	16.0	36.9		22.2	10.7	42.2		20.1
Change Period (Y+Rc), s	4.0	5.7		4.9	4.0	5.7		4.9
Max Green Setting (Gmax), s	12.0	42.3		23.1	12.0	42.3		23.1
Max Q Clear Time (g_c+I1), s	13.2	23.3		16.0	5.8	19.9		13.3
Green Ext Time (p_c), s	0.0	7.9		0.8	0.0	6.2		1.3

Intersection Summary	
HCM 7th Control Delay, s/veh	36.6
HCM 7th LOS	D

Notes

User approved volume balancing among the lanes for turning movement.
Unsignalized Delay for [EBR, WBR] is excluded from calculations of the approach delay and intersection delay.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	43	1393	76	31	1229	146	186	82	52	180	25	44
Future Volume (veh/h)	43	1393	76	31	1229	146	186	82	52	180	25	44
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1856	1856	1811	1870	1856	1885	1885	1841	1856	1841	1885
Adj Flow Rate, veh/h	46	1482	0	33	1294	0	227	100	0	194	27	47
Peak Hour Factor	0.94	0.94	0.94	0.95	0.95	0.95	0.82	0.82	0.82	0.93	0.93	0.93
Percent Heavy Veh, %	2	3	3	6	2	3	1	1	4	3	4	1
Cap, veh/h	109	1543		168	1517		320	221		233	95	165
Arrive On Green	0.06	0.44	0.00	0.05	0.43	0.00	0.09	0.12	0.00	0.13	0.16	0.16
Sat Flow, veh/h	1781	3526	1572	3346	3554	1572	3483	1885	1560	1767	602	1048
Grp Volume(v), veh/h	46	1482	0	33	1294	0	227	100	0	194	0	74
Grp Sat Flow(s),veh/h/ln	1781	1763	1572	1673	1777	1572	1742	1885	1560	1767	0	1650
Q Serve(g_s), s	2.2	36.0	0.0	0.8	29.0	0.0	5.6	4.4	0.0	9.5	0.0	3.5
Cycle Q Clear(g_c), s	2.2	36.0	0.0	0.8	29.0	0.0	5.6	4.4	0.0	9.5	0.0	3.5
Prop In Lane	1.00		1.00	1.00		1.00	1.00		1.00	1.00		0.64
Lane Grp Cap(c), veh/h	109	1543		168	1517		320	221		233	0	260
V/C Ratio(X)	0.42	0.96		0.20	0.85		0.71	0.45		0.83	0.00	0.29
Avail Cap(c_a), veh/h	393	1549		739	1562		769	512		390	0	448
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	39.9	24.1	0.0	40.2	22.8	0.0	38.9	36.3	0.0	37.4	0.0	32.8
Incr Delay (d2), s/veh	2.6	14.5	0.0	0.6	4.7	0.0	2.9	1.4	0.0	7.5	0.0	0.6
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.0	16.2	0.0	0.3	11.7	0.0	2.4	2.0	0.0	4.3	0.0	1.4
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	42.5	38.6	0.0	40.8	27.5	0.0	41.9	37.8	0.0	44.9	0.0	33.4
LnGrp LOS	D	D		D	C		D	D		D		C
Approach Vol, veh/h		1528			1327			327			268	
Approach Delay, s/veh		38.7			27.8			40.6			41.7	
Approach LOS		D			C			D			D	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	17.2	16.3	10.9	43.9	13.6	19.9	9.9	44.9
Change Period (Y+Rc), s	5.5	6.0	5.5	* 6.2	5.5	6.0	5.5	* 6.2
Max Green Setting (Gmax), s	19.5	24.0	19.5	* 39	19.5	24.0	19.5	* 39
Max Q Clear Time (g_c+I1), s	11.5	6.4	4.2	31.0	7.6	5.5	2.8	38.0
Green Ext Time (p_c), s	0.3	0.3	0.1	4.8	0.5	0.3	0.0	0.7

Intersection Summary	
HCM 7th Control Delay, s/veh	34.9
HCM 7th LOS	C

Notes

* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.

Unsignalized Delay for [NBR, EBR, WBR] is excluded from calculations of the approach delay and intersection delay.

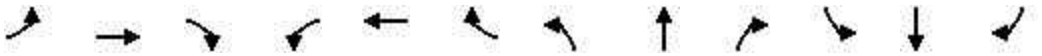
Intersection	
Int Delay, s/veh	15.6

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	438	0	393	296	0	490
Future Vol, veh/h	438	0	393	296	0	490
Conflicting Peds, #/hr	0	1	1	0	2	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	75	-	-	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	86	86	92	92	96	96
Heavy Vehicles, %	1	1	1	2	1	1
Mvmt Flow	509	0	427	322	0	510

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	-	510	0	-	510
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	-	4.11	-	-	6.21
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	-	2.209	-	-	3.309
Pot Cap-1 Maneuver	-	0	1060	-	0	565
Stage 1	-	0	-	-	0	-
Stage 2	-	0	-	-	0	-
Platoon blocked, %	-			-		
Mov Cap-1 Maneuver	-	-	1059	-	-	565
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-

Approach	EB	WB	NB
HCM Control Delay, s/v	0	6.09	45.07
HCM LOS			E

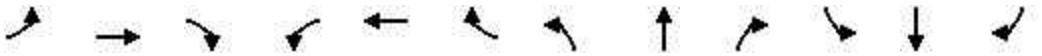
Minor Lane/Major Mvmt	NBLn1	EBT	WBL	WBT
Capacity (veh/h)	565	-	1059	-
HCM Lane V/C Ratio	0.904	-	0.403	-
HCM Control Delay (s/veh)	45.1	-	10.7	-
HCM Lane LOS	E	-	B	-
HCM 95th %tile Q(veh)	10.9	-	2	-



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	0	300	178	395	485	0	0	0	0	15	560	93
Future Volume (vph)	0	300	178	395	485	0	0	0	0	15	560	93
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	12	12	12	12	12	12	12	12	12	14	14	14
Total Lost time (s)		4.0		3.5	4.0						4.0	
Lane Util. Factor		0.95		1.00	0.95						0.95	
Frpb, ped/bikes		0.99		1.00	1.00						1.00	
Flpb, ped/bikes		1.00		1.00	1.00						1.00	
Frt		0.94		1.00	1.00						0.98	
Flt Protected		1.00		0.95	1.00						1.00	
Satd. Flow (prot)		3107		1582	3294						3378	
Flt Permitted		1.00		0.31	1.00						1.00	
Satd. Flow (perm)		3107		510	3294						3378	
Peak-hour factor, PHF	0.90	0.90	0.90	0.93	0.93	0.93	0.92	0.92	0.92	0.88	0.88	0.88
Adj. Flow (vph)	0	333	198	425	522	0	0	0	0	17	636	106
RTOR Reduction (vph)	0	97	0	0	0	0	0	0	0	0	15	0
Lane Group Flow (vph)	0	434	0	425	522	0	0	0	0	0	744	0
Confl. Peds. (#/hr)	12		6	6		12	7					7
Heavy Vehicles (%)	0%	2%	5%	8%	3%	0%	0%	0%	0%	7%	6%	1%
Bus Blockages (#/hr)	0	0	4	0	4	0	0	0	0	0	0	2
Turn Type		NA		pm+pt	NA					Perm	NA	
Protected Phases		8		7	4						2	
Permitted Phases				4						2		
Actuated Green, G (s)		21.4		46.9	46.4						34.1	
Effective Green, g (s)		22.0		47.5	47.0						35.0	
Actuated g/C Ratio		0.24		0.53	0.52						0.39	
Clearance Time (s)		4.6		4.1	4.6						4.9	
Lane Grp Cap (vph)		759		525	1720						1313	
v/s Ratio Prot		0.14		c0.19	0.16							
v/s Ratio Perm				c0.23							0.22	
v/c Ratio		0.57		0.81	0.30						0.57	
Uniform Delay, d1		29.9		22.3	12.2						21.6	
Progression Factor		1.00		1.00	1.00						1.00	
Incremental Delay, d2		3.1		12.7	0.5						1.8	
Delay (s)		33.0		35.0	12.7						23.3	
Level of Service		C		D	B						C	
Approach Delay (s/veh)		33.0			22.7			0.0			23.3	
Approach LOS		C			C			A			C	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	25.4	HCM 2000 Level of Service	C
HCM 2000 Volume to Capacity ratio	0.72		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	11.5
Intersection Capacity Utilization	69.0%	ICU Level of Service	C
Analysis Period (min)	15		
Description: date collected 3/21/2019			

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	283	608	180	108	615	146	302	1197	103	131	913	228
Future Volume (vph)	283	608	180	108	615	146	302	1197	103	131	913	228
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	11	12	12	11	12	13	11	11	12	11	11	12
Total Lost time (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0
Lane Util. Factor	0.97	0.95	1.00	0.97	0.95	1.00	1.00	0.91	1.00	1.00	0.91	1.00
Frpb, ped/bikes	1.00	1.00	0.97	1.00	1.00	0.98	1.00	1.00	0.98	1.00	1.00	0.98
Flpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00	0.85	1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (prot)	3144	3307	1444	3113	3373	1532	1637	4632	1463	1637	4543	1488
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00	1.00
Satd. Flow (perm)	3144	3307	1444	3113	3373	1532	1637	4632	1463	1637	4543	1488
Peak-hour factor, PHF	0.89	0.89	0.89	0.91	0.91	0.91	0.86	0.86	0.86	0.94	0.94	0.94
Adj. Flow (vph)	318	683	202	119	676	160	351	1392	120	139	971	243
RTOR Reduction (vph)	0	0	79	0	0	123	0	0	51	0	0	150
Lane Group Flow (vph)	318	683	123	119	676	37	351	1392	69	139	971	93
Confl. Peds. (#/hr)	7		12	12		7	4		9	9		4
Heavy Vehicles (%)	2%	3%	3%	3%	1%	1%	1%	2%	2%	1%	4%	1%
Bus Blockages (#/hr)	0	2	0	0	2	0	0	4	0	0	4	0
Turn Type	Prot	NA	Perm	Prot	NA	Perm	Prot	NA	Perm	Prot	NA	Perm
Protected Phases	3	8		7	4		5	2		1	6	
Permitted Phases			8			4			2			6
Actuated Green, G (s)	20.7	46.2	46.2	10.8	36.5	36.5	37.2	71.2	71.2	16.6	50.6	50.6
Effective Green, g (s)	22.7	48.4	48.4	12.8	38.5	38.5	39.2	73.2	73.2	18.6	52.6	52.6
Actuated g/C Ratio	0.14	0.29	0.29	0.08	0.23	0.23	0.24	0.44	0.44	0.11	0.32	0.32
Clearance Time (s)	5.0	5.2	5.2	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0
Vehicle Extension (s)	2.0	3.0	3.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	3.0	3.0
Lane Grp Cap (vph)	432	970	423	241	787	357	388	2054	649	184	1448	474
v/s Ratio Prot	c0.10	0.21		0.04	c0.20		c0.21	c0.30		0.08	0.21	
v/s Ratio Perm			0.09			0.02			0.05			0.06
v/c Ratio	0.74	0.70	0.29	0.49	0.86	0.10	0.90	0.68	0.11	0.76	0.67	0.20
Uniform Delay, d1	68.3	51.9	45.0	73.0	60.6	49.7	61.1	36.5	26.8	71.0	48.7	40.8
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	5.6	2.3	0.4	0.6	8.9	0.0	23.4	1.8	0.3	14.4	1.2	0.2
Delay (s)	73.8	54.3	45.4	73.6	69.6	49.8	84.5	38.3	27.1	85.4	49.9	41.0
Level of Service	E	D	D	E	E	D	F	D	C	F	D	D
Approach Delay (s/veh)		58.0			66.7			46.3			52.0	
Approach LOS		E			E			D			D	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	54.0	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.80		
Actuated Cycle Length (s)	165.0	Sum of lost time (s)	12.0
Intersection Capacity Utilization	79.9%	ICU Level of Service	D
Analysis Period (min)	15		
Description: date collected 12/12/2023			
c Critical Lane Group			



Movement	WBL	WBR	WBR2	NBL	NBT	NBR	SBL	SBT	SBR	SEL2	SEL	SER
Lane Configurations												
Traffic Volume (vph)	209	676	686	162	677	165	0	0	0	51	701	441
Future Volume (vph)	209	676	686	162	677	165	0	0	0	51	701	441
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	12	12	13	12	12	12	12	12	12	12	12	13
Total Lost time (s)	3.0	3.0	3.0		3.0	3.0				3.0	3.0	2.6
Lane Util. Factor	1.00	0.88	1.00		0.95	1.00				1.00	0.97	1.00
Frpb, ped/bikes	1.00	1.00	0.98		1.00	1.00				1.00	1.00	1.00
Flpb, ped/bikes	1.00	1.00	1.00		1.00	1.00				1.00	1.00	1.00
Frt	1.00	0.85	0.85		1.00	0.85				1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00		0.99	1.00				0.95	0.95	1.00
Satd. Flow (prot)	1629	2554	1470		3294	1500				1629	3147	1487
Flt Permitted	0.95	1.00	1.00		0.99	1.00				0.95	0.95	1.00
Satd. Flow (perm)	1629	2554	1470		3294	1500				1629	3147	1487
Peak-hour factor, PHF	0.96	0.96	0.96	0.94	0.94	0.94	0.92	0.92	0.92	0.93	0.93	0.93
Adj. Flow (vph)	218	704	715	172	720	176	0	0	0	55	754	474
RTOR Reduction (vph)	0	0	318	0	0	115	0	0	0	0	0	33
Lane Group Flow (vph)	218	704	397	0	892	61	0	0	0	55	754	441
Confl. Peds. (#/hr)	11		10	2					2	10		11
Heavy Vehicles (%)	5%	5%	5%	2%	2%	2%	2%	2%	2%	5%	5%	5%
Bus Blockages (#/hr)	0	2	0	0	4	0	0	0	0	0	2	2
Turn Type	Prot	Prot	Perm	Split	NA	Perm				Prot	Prot	pt+ov
Protected Phases	7	6		8	8					5	5 6	6 8
Permitted Phases			6			8						5 6
Actuated Green, G (s)	10.8	23.8	23.8		31.1	31.1				10.4	38.4	69.9
Effective Green, g (s)	12.0	25.0	25.0		32.7	32.7				12.0	37.4	70.1
Actuated g/C Ratio	0.13	0.27	0.27		0.35	0.35				0.13	0.40	0.75
Clearance Time (s)	4.2	4.2	4.2		4.6	4.6				4.6		
Vehicle Extension (s)	2.0	3.5	3.5		2.5	2.5				2.0		
Lane Grp Cap (vph)	208	681	392		1149	523				208	1256	1153
v/s Ratio Prot	c0.13	c0.28			c0.27					0.03	c0.24	0.24
v/s Ratio Perm			0.27			0.04						0.06
v/c Ratio	1.05	1.03	1.01		0.78	0.12				0.26	0.60	0.38
Uniform Delay, d1	40.9	34.4	34.4		27.2	20.7				36.9	22.2	4.2
Progression Factor	1.00	1.00	1.00		1.00	1.00				0.80	0.72	0.90
Incremental Delay, d2	75.6	43.5	48.6		3.2	0.1				0.2	0.4	0.2
Delay (s)	116.5	77.8	82.9		30.5	20.8				29.7	16.3	3.9
Level of Service	F	E	F		C	C				C	B	A
Approach Delay (s/veh)	85.2				28.9			0.0			12.3	
Approach LOS	F				C			A			B	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	46.7	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	1.03		
Actuated Cycle Length (s)	93.7	Sum of lost time (s)	24.8
Intersection Capacity Utilization	77.3%	ICU Level of Service	D
Analysis Period (min)	15		
Description: date collected 10/5/2022			
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	8	402	0	0	216	333	80	1989	2	0	0	0
Future Volume (vph)	8	402	0	0	216	333	80	1989	2	0	0	0
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	12	12	12	12	11	11	11	11	11	12	12	12
Total Lost time (s)		3.5			3.5		3.5	3.5				
Lane Util. Factor		0.95			0.95		1.00	0.91				
Frpb, ped/bikes		1.00			0.99		1.00	1.00				
Flpb, ped/bikes		1.00			1.00		0.98	1.00				
Frt		1.00			0.91		1.00	1.00				
Flt Protected		1.00			1.00		0.95	1.00				
Satd. Flow (prot)		3292			2887		1573	4656				
Flt Permitted		0.94			1.00		0.95	1.00				
Satd. Flow (perm)		3092			2887		1573	4656				
Peak-hour factor, PHF	0.80	0.80	0.80	0.79	0.79	0.79	0.99	0.99	0.99	0.92	0.92	0.92
Adj. Flow (vph)	10	502	0	0	273	422	81	2009	2	0	0	0
RTOR Reduction (vph)	0	0	0	0	7	0	0	0	0	0	0	0
Lane Group Flow (vph)	0	513	0	0	688	0	81	2011	0	0	0	0
Confl. Peds. (#/hr)	9		18	18		9	16		29	29		16
Heavy Vehicles (%)	0%	3%	0%	0%	3%	1%	3%	2%	6%	0%	0%	0%
Bus Blockages (#/hr)	0	4	0	0	4	0	0	0	0	0	0	0
Turn Type	Perm	NA			NA		Perm	NA				
Protected Phases		4			4			2				
Permitted Phases	4						2					
Actuated Green, G (s)		26.5			26.5		52.5	52.5				
Effective Green, g (s)		28.5			28.5		54.5	54.5				
Actuated g/C Ratio		0.32			0.32		0.61	0.61				
Clearance Time (s)		5.5			5.5		5.5	5.5				
Lane Grp Cap (vph)		979			914		952	2819				
v/s Ratio Prot					c0.24			c0.43				
v/s Ratio Perm		0.17					0.05					
v/c Ratio		0.52			0.91dr		0.09	0.71				
Uniform Delay, d1		25.2			27.6		7.4	12.3				
Progression Factor		1.02			1.00		0.35	0.28				
Incremental Delay, d2		1.9			5.7		0.1	1.3				
Delay (s)		27.8			33.3		2.7	4.7				
Level of Service		C			C		A	A				
Approach Delay (s/veh)		27.8			33.3			4.6			0.0	
Approach LOS		C			C			A			A	

Intersection Summary			
HCM 2000 Control Delay (s/veh)	14.2	HCM 2000 Level of Service	B
HCM 2000 Volume to Capacity ratio	0.73		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	7.0
Intersection Capacity Utilization	65.5%	ICU Level of Service	C
Analysis Period (min)	15		

Description: date collected 4/27/2023

dr Defacto Right Lane. Recode with 1 though lane as a right lane.

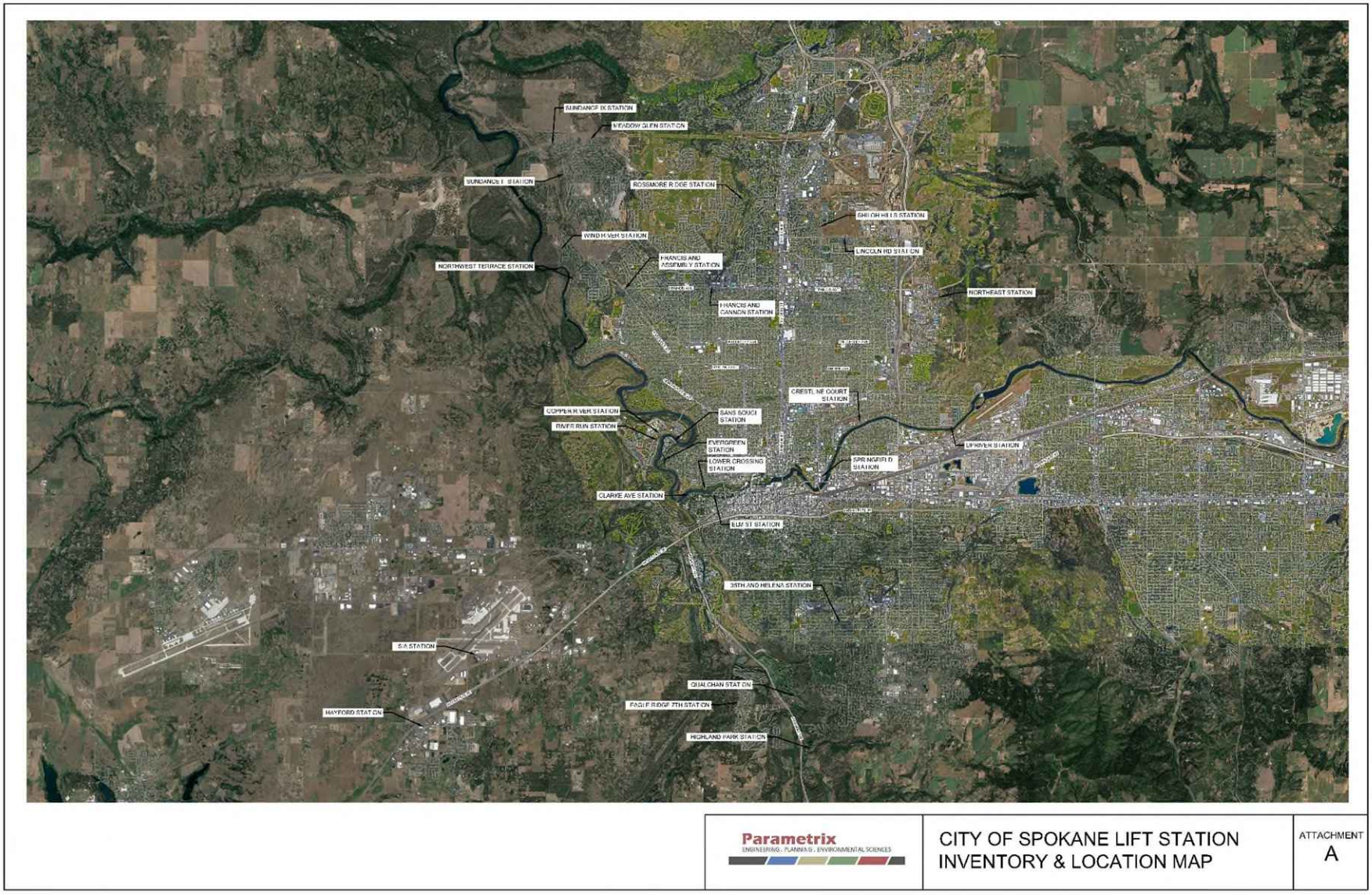
c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	202	375	0	0	401	113	212	2297	97	0	0	0
Future Volume (vph)	202	375	0	0	401	113	212	2297	97	0	0	0
Ideal Flow (vphpl)	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Lane Width	11	12	12	12	12	12	13	13	13	12	12	12
Total Lost time (s)	3.4	4.0			4.0			4.0				
Lane Util. Factor	1.00	0.95			0.95			0.86				
Frpb, ped/bikes	1.00	1.00			1.00			1.00				
Flpb, ped/bikes	1.00	1.00			1.00			1.00				
Frt	1.00	1.00			0.97			0.99				
Flt Protected	0.95	1.00			1.00			1.00				
Satd. Flow (prot)	1604	3340			3241			6187				
Flt Permitted	0.24	1.00			1.00			1.00				
Satd. Flow (perm)	401	3340			3241			6187				
Peak-hour factor, PHF	0.86	0.86	0.86	0.94	0.94	0.94	0.96	0.96	0.96	0.97	0.97	0.97
Adj. Flow (vph)	235	436	0	0	427	120	221	2393	101	0	0	0
RTOR Reduction (vph)	0	0	0	0	29	0	0	5	0	0	0	0
Lane Group Flow (vph)	235	436	0	0	518	0	0	2710	0	0	0	0
Confl. Peds. (#/hr)	5		5	5		5	5		5	5		5
Heavy Vehicles (%)	3%	2%	0%	0%	1%	2%	1%	2%	2%	0%	0%	0%
Bus Blockages (#/hr)	0	2	0	0	2	0	0	4	0	0	0	0
Turn Type	pm+pt	NA			NA		Perm	NA				
Protected Phases	4	8			3			2				
Permitted Phases	8						2					
Actuated Green, G (s)	33.1	32.5			17.9			53.3				
Effective Green, g (s)	33.7	33.1			18.5			53.9				
Actuated g/C Ratio	0.35	0.35			0.19			0.57				
Clearance Time (s)	4.0	4.6			4.6			4.6				
Vehicle Extension (s)	2.0	0.2			0.2			0.2				
Lane Grp Cap (vph)	284	1163			631			3510				
v/s Ratio Prot	c0.10	0.13			0.16							
v/s Ratio Perm	c0.20							0.44				
v/c Ratio	0.83	0.37			0.82			0.77				
Uniform Delay, d1	33.6	23.2			36.7			15.8				
Progression Factor	1.00	1.00			1.00			1.00				
Incremental Delay, d2	16.9	0.1			8.0			1.7				
Delay (s)	50.5	23.3			44.7			17.5				
Level of Service	D	C			D			B				
Approach Delay (s/veh)		32.8			44.7			17.5			0.0	
Approach LOS		C			D			B			A	

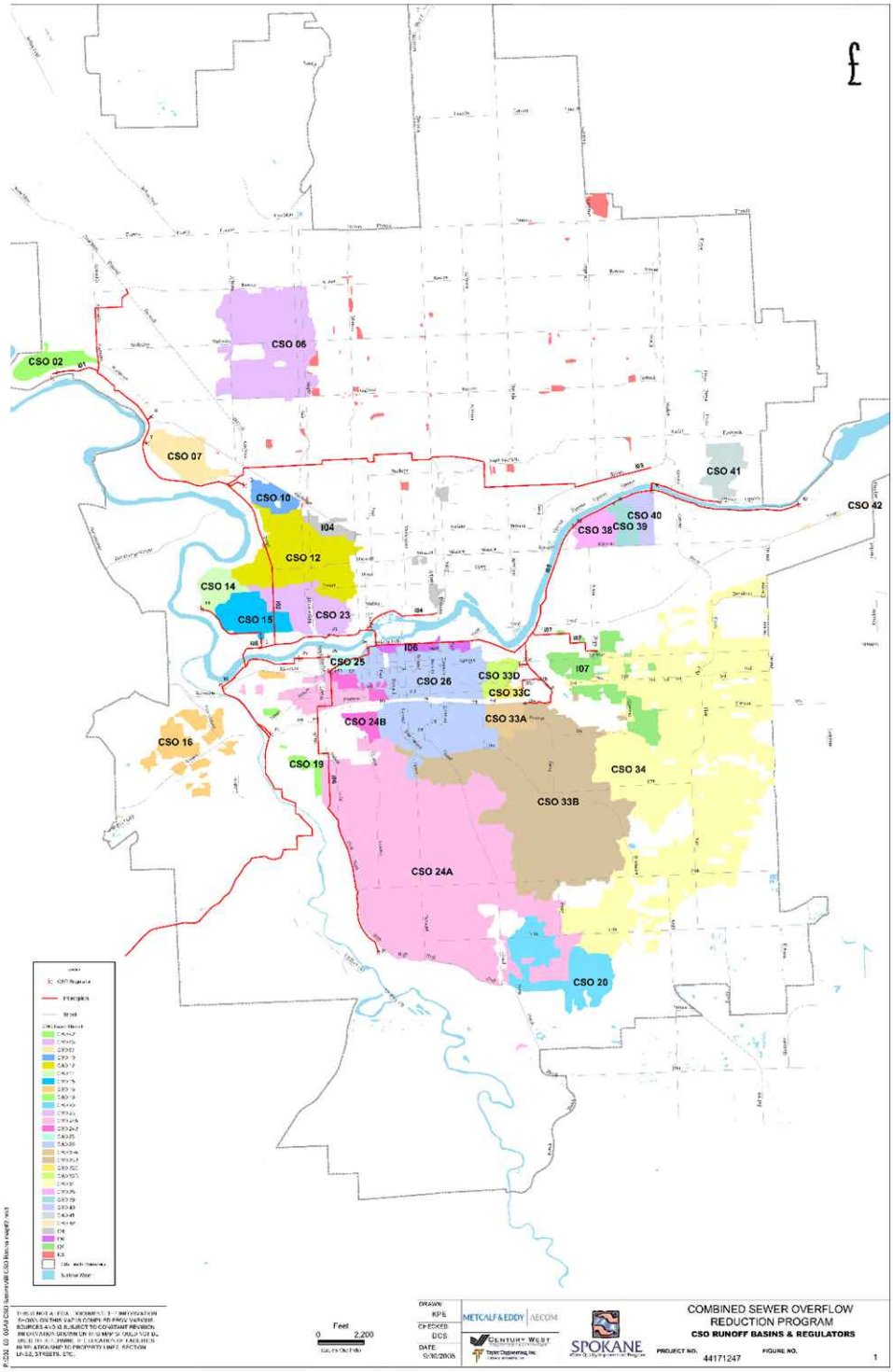
Intersection Summary			
HCM 2000 Control Delay (s/veh)	23.9	HCM 2000 Level of Service	C
HCM 2000 Volume to Capacity ratio	0.81		
Actuated Cycle Length (s)	95.0	Sum of lost time (s)	11.4
Intersection Capacity Utilization	78.1%	ICU Level of Service	D
Analysis Period (min)	15		
Description: date collected 12/13/2023			
c Critical Lane Group			

D Utility Maps

Lift Station Inventory



CSO Basin Sites



E Environmental Review Exemptions to Promote Infill Development and Housing

PLANSPOKANE
Resilient | Connected | Livable | 2046

Environmental Review Exemptions to Promote Infill Development and Housing

Prepared by: BERK Consulting, Inc. |
December 2025, Revised October 2026

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.[1]

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 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. The City prepared a notice of the intent to provide for exemptions in December 2025. The City conducted meetings with WSDOT and other agencies. See **Appendix 6.F**.

[1] See: Spokane Housing Action Plan - City of Spokane, Washington.

This document outlines requirements, describes policies and regulations that mitigate impacts, and identifies potential infill exemption locations and phasing.

Exemption Types

Infill and Housing Exemptions

To accommodate infill development in urban areas not meeting the density goals of a Comprehensive Plan,[2] 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;

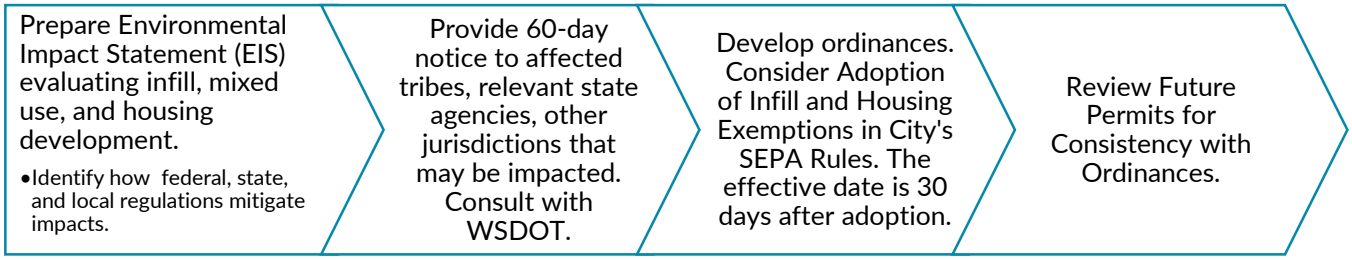
Senate Bill 5412 (2023) added a new section at RCW 43.21C.229(3) allowing cities or counties (in urban growth areas) to adopt a new SEPA exemption for all project actions proposing to develop housing units provided:

- 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;
- 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.

[2] 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 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)[3], 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 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.

[3] See: https://apps.ecology.wa.gov/publications/documents/2506009.pdf.

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)[4] 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.

"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
- Requires a land use decision that is not exempt under WAC 197-11-800(6) such as rezones requiring a corresponding Comprehensive Plan Amendment.

[4] 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.

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 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.

Environmental Topic	Plans and Codes Addressing Environmental Topic
	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. ▶ SMC Section 15.05.020 Greenhouse Gas Emissions Reduction Goals. ▶ Comprehensive Emergency Management Plan (CEMP) to address how it prepares for, responds to, and recovers from emergencies and disasters.
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

Environmental Topic	Plans and Codes Addressing Environmental Topic
	▶ 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 **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.

Environmental Topic	Plans and Codes Addressing Environmental Topic
	6. Stormwater Management Manual for Eastern Washington (SWMMEW), Washington State Department of Ecology, latest edition. Spokane Aquifer Joint Board Wellhead Protection Program
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

Environmental Topic	Plans and Codes Addressing Environmental Topic
	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 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 Topic	Plans and Codes Addressing Environmental Topic
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) ▶ 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)

Environmental Topic	Plans and Codes Addressing Environmental Topic
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/
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:

Environmental Topic	Plans and Codes Addressing Environmental Topic
	▶ 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 and regulation 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 ▶ Chapter 15.06 SMC Preservation of Salvageable Materials code The ~~Draft~~ Final 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

Environmental Topic	Plans and Codes Addressing Environmental Topic
	▶ 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 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

Environmental Topic	Plans and Codes Addressing Environmental Topic
	▶ 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 ▶ 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

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.

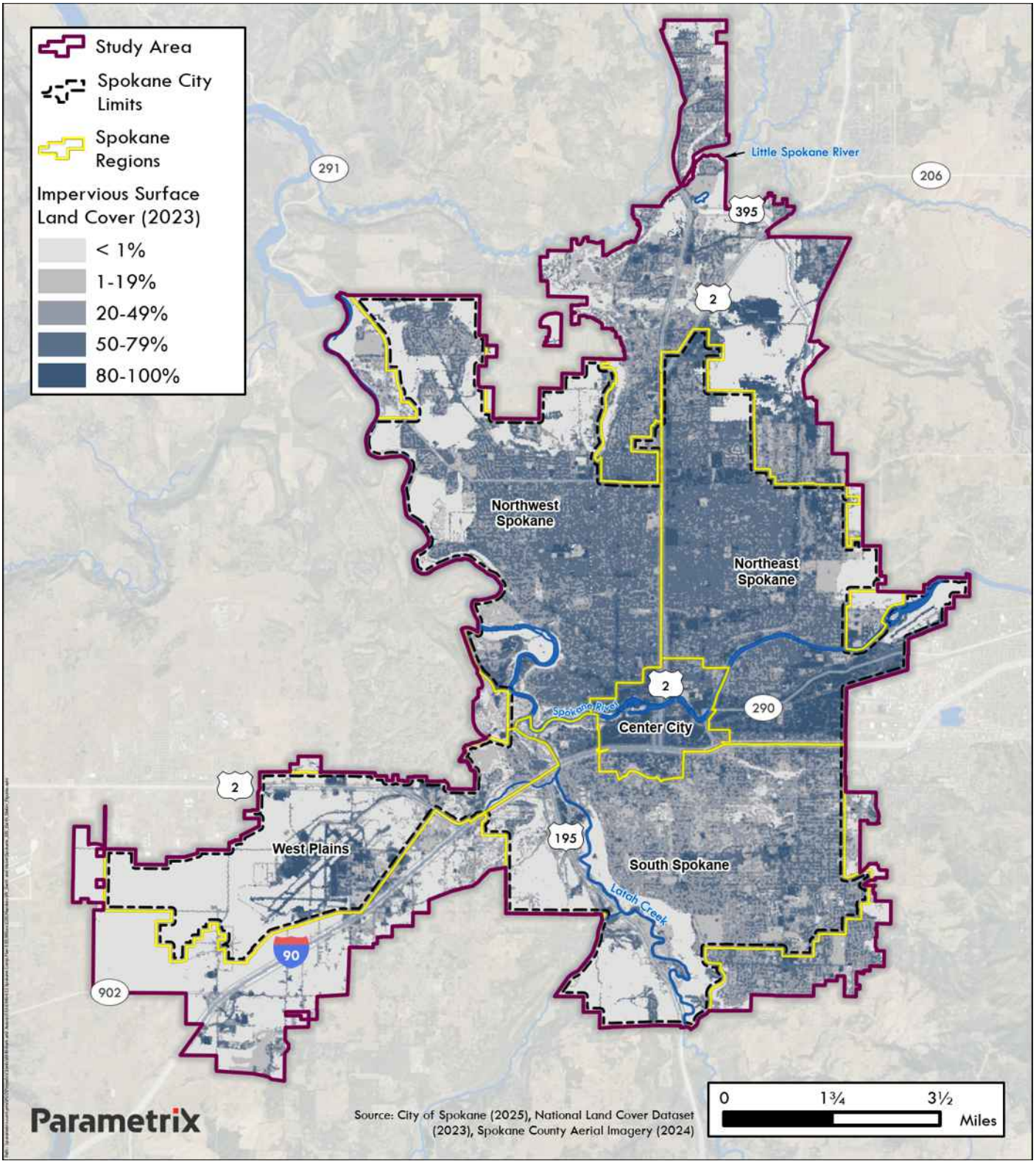
Maps informing the phases are included on the following pages:

- 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:

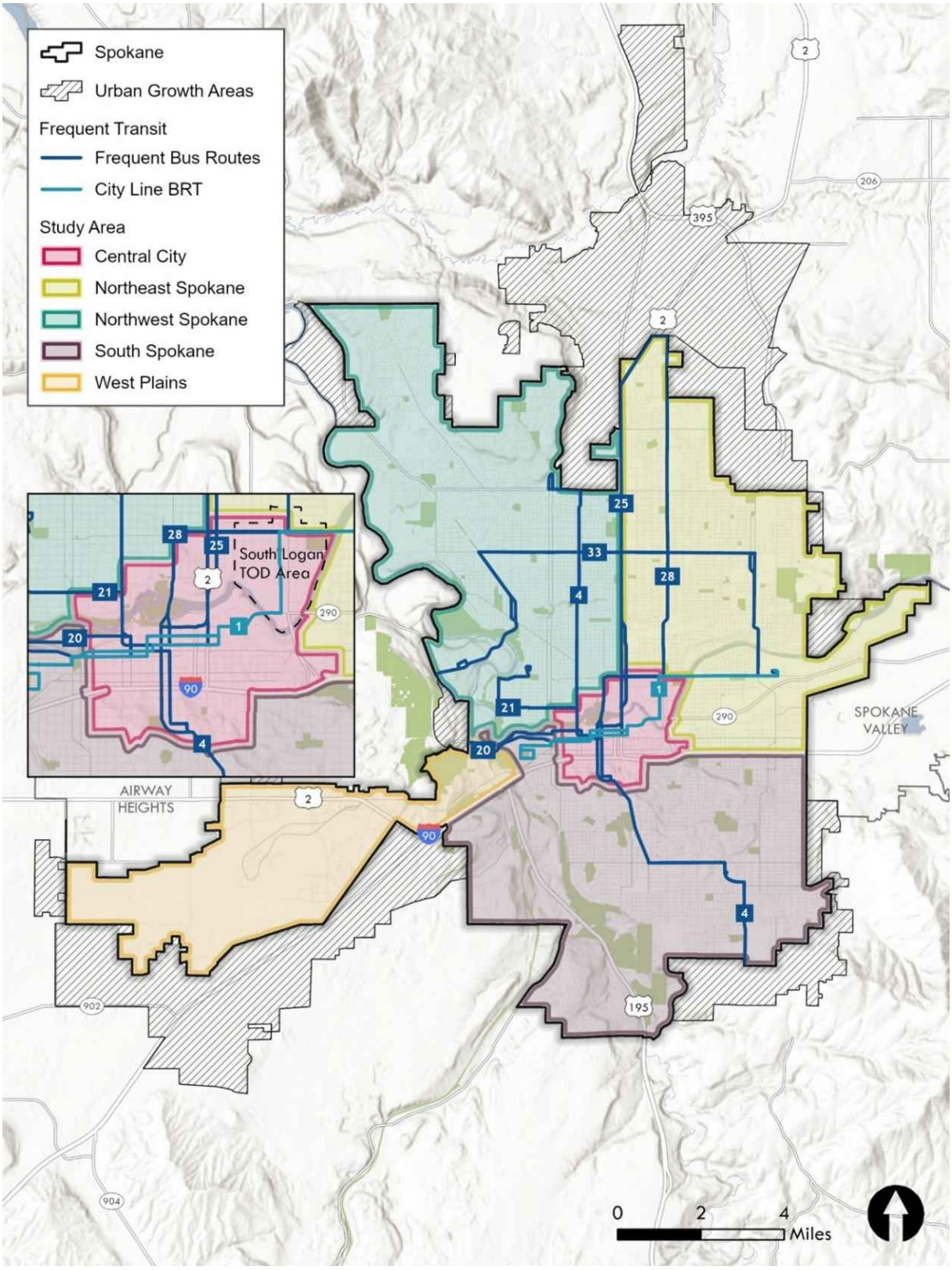
- Exhibit 7: Phased SEPA Proposed Infill /Categorical Exemption Area

Exhibit 4: Existing Hard (Impervious) Surfaces (2023)



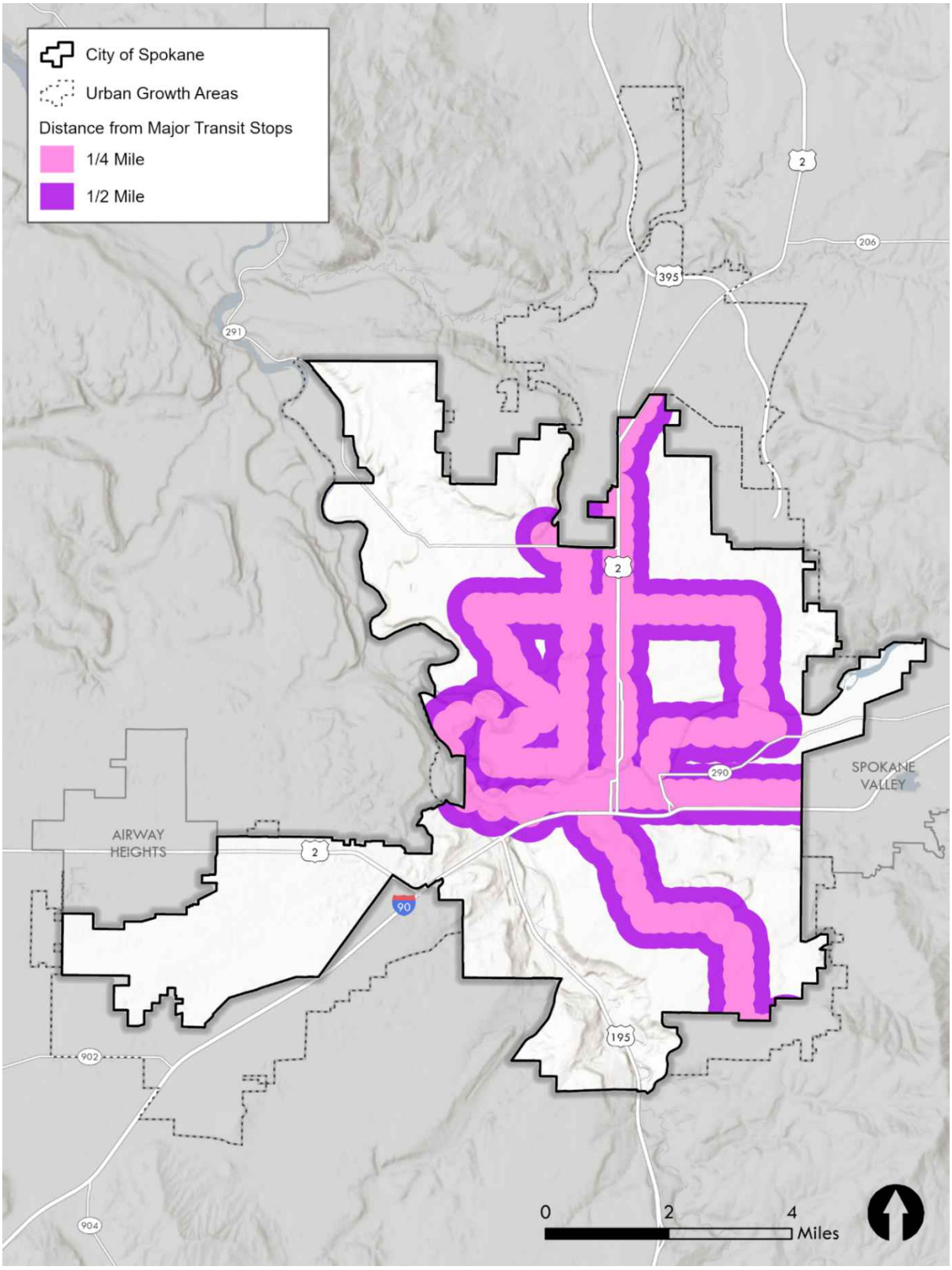
Source: City of Spokane, 2025; National Land Cover Dataset, 2023; Spokane County Aerial Imagery, 2024.
NOTE: *The map above was updated with the Final EIS.*

Exhibit 5: EIS Study Areas with Frequent Transit Routes (2025)



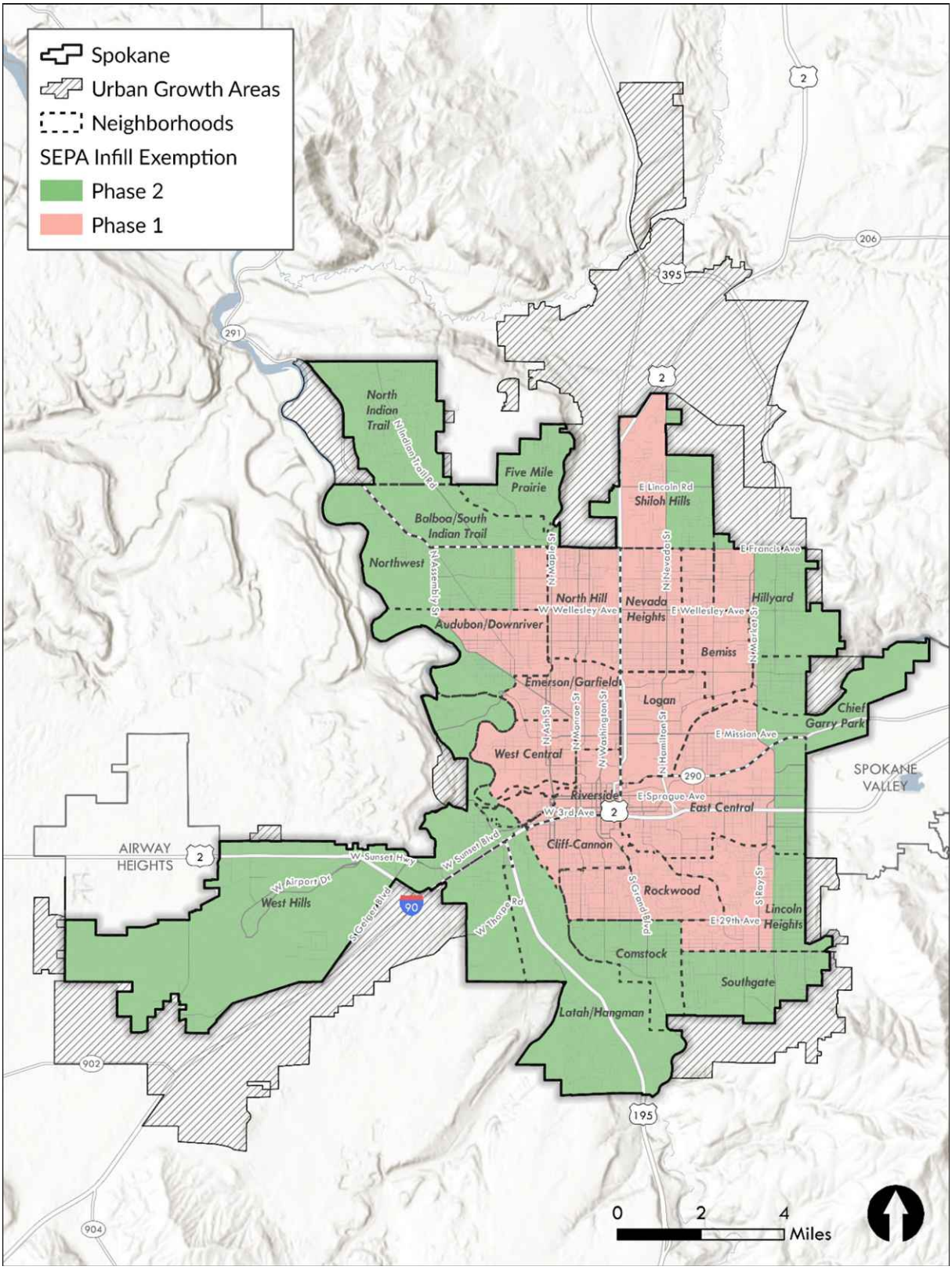
Source: City of Spokane, BERK, 2025.

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.

F PlanSpokane Transportation Coordination & Consultation

Fall 2026 | Summary by BERK Consulting, Inc.

NOTE: *Appendix below was added with the Final EIS.*

Overview

For the PlanSpokane periodic update and Environmental Impact Statement (EIS), the City of Spokane has based its transportation modeling and key assumptions about the existing and future growth and transportation network on the Horizon 2050 metropolitan transportation plan. This interjurisdictional regional transportation planning process was led by the Spokane Regional Transportation Council (SRTC) and supported by Washington State Department of Transportation (WSDOT), City of Spokane, Spokane County, Spokane Transit Authority, and other cities and Tribes.

Prior to and after the PlanSpokane Draft EIS publication, the City of Spokane met and corresponded to exchange information, comments, and ideas during the periodic update and EIS process addressing both the city's transportation system and the state's. The City of Spokane has also met with SRTC.

Recently the City developed a Preferred Alternative; this has allowed the City to prepare more detailed land use proposals, and Comprehensive Plan elements published in Summer and Fall 2026. It also allows evaluation of the Preferred Alternative in a Final EIS published in October 2026.

Key points of coordination and consultation have included, to date:

February 5, 2025: City of Spokane Determination of Significance & Request for Comments on Scope of EIS for the City's Comprehensive Plan Periodic Update (60-day comment period, to April 7, 2025, three times the minimum SEPA comment period)

February 19, 2025: City of Spokane Agency and Tribes Workshop during EIS Scoping period

April 3, 2025: WSDOT Scoping Comments

May 14, 2025: City of Spokane request to set up a time for consultation between WSDOT and City

June 3, 2025: Meeting, SEPA Categorical Exemption Consultation, WSDOT and City of Spokane

July 1, 2025: City of Spokane Email RE: SEPA Categorical Exemption Consultation between WSDOT and City of Spokane, responding to requests for locations/evaluation

City expanded its transportation scope to include areas of SR 904, US 2, US 195 and SR 291 for link level analysis

September 9, 2025: Meeting with SRTC and City of Spokane, discussion of EIS employment alternatives

For a conservative analysis, Alternative 3 included greater growth in employment than Alternative 1 (No Action) which included growth under SRTC model

October 2, 2025: City of Spokane Email RCW 43.21C.229(3), WSDOT Infill and Housing, request for written information on WSDOT consultation process

December 2, 2025: City of Spokane Plan Commission meeting, presentation by SRTC on Horizon 2050

December 18, 2025: City of Spokane DEIS Issuance and SEPA Consultation Notice (60-day comment period, twice the minimum SEPA comment period)

December 31, 2025: City of Spokane email, RE: Clarification on Supporting Documentation Needed for WSDOT Comprehensive Plan Review

January 6, 2026: City of Spokane, PlanSpokane EIS Agency and Tribal Government Meeting

January 12, 2026: City of Spokane email response, Courtesy conveyance of WSDOT PRR C000009-010526, with requested information on land use and transportation to WSDOT, in response to WSDOT requesting supporting technical documentation (December 23, 2025)

January 13, 2026: City and WSDOT meeting, reviewing requested information on land use and transportation

February 18, 2026: WSDOT DEIS Comment Letter #1

February 19, 2026: City of Spokane Extension of Draft EIS Comment Period to March 5, 2026

February 20, 2026: City of Spokane email RE: City of Spokane DEIS - VISUM Modeling Request and transfer of TAZ Map/GIS data

February 23, 2026: Meeting, WSDOT / City of Spokane - review of data provided

February 26, 2026: City of Spokane email, confirming "connector loading data" was transferred from City consultants to WSDOT per request

March 5, 2026: Close of extended Draft EIS Comment Period

March 5, 2026: WSDOT DEIS Comment Letter #2

April 14, 2026: Plan Commission Hearing, Preferred Alternative

April 14, 2026: Proposed Preferred Alternative WSDOT Comments

The Growth Management Act (RCW 36.70a.070) requires disclosure of the evaluation of multi-modal LOS on local and state facilities and to identify any impacts. The City has coordinated with WSDOT on the EIS analysis and has followed the City's and WSDOT's levels of service/published thresholds in preparing the work. Where the LOS targets are not met, the EIS provides strategies and mitigation measures that the City could consider.

May 18, 2026: City Council Hearing, Preferred Alternative

Resolution affirms consistency with SRTC regional model employment assumptions

Blends features of Alternatives 2 and 3 and focuses growth in downtown/hubs/transit served areas. Fits WSDOT goals for focusing on multimodal investments and supporting state's goals for infill development.

May 26, 2026: Meeting scheduled with City and WSDOT

Based on WSDOT comments regarding Draft EIS, adjustments to analysis in Final EIS per Chapter 4 Responses to Comments:

- *Reevaluate intersection US 2 and Flint Rd (Zone 5501, consider adjusting the forecasts at US 2 and Flint Rd to assign more demand to 21st Avenue)*
- *Adjustments to connectors for: Zones 1842, 1850, 1861; Zone 5512; Zone 5271; Zones 290 and 340. Would not have a material impact on forecasted volumes at nearby study locations.*
- *Growth is consistent with Growth Targets and Period 2024-2046.*
- *Study locations appropriate to level of planning.*

Fall 2026 steps for state and regional planning / coordination

- Draft Plan issuance and 60-day notice to State Department of Commerce
- SRTC Transportation Element certification process

G Marked Comment Letters

NOTE: *Appendix below was added with the Final EIS. See Chapter 4 for a matrix with responses to marked comments included in this Appendix.*

G-1. Commenters – Tribes, Agencies, Organizations

#	Date	Organization	Type	Commenter
1	2/18/2026	Coeur d'Alene Tribe	1. Tribes and Agencies	Chief Allan, Chairman
2	1/6/2026	DNR	1. Tribes and Agencies	Sears, Tricia
3	2/17/2026	Ecology	1. Tribes and Agencies	Hiebert, Amanda
4	2/18/2026	Spokane County	1. Tribes and Agencies	Chesney, Scott R.
5	2/18/2026	Spokane Transit Authority	1. Tribes and Agencies	Jennings, Brian
6	2/12/2026	SRTC	1. Tribes and Agencies	Stewart, Ryan
7	3/5/2026	WSDOT	1. Tribes and Agencies	Clarke, Corey
8	2/18/2026	WSDOT	1. Tribes and Agencies	Figg, Greg
9	1/30/2026	Spokane Historic Preservation Office	1. Tribes and Agencies	Camporeale, Logan
10	2/18/2026	Spokane ICM	1. Tribes and Agencies	Picanco, Kevin
11	3/5/2026	Spokane ICM	1. Tribes and Agencies	Picanco, Kevin
12	2/24/2026	Community Assembly	2. Community Assembly and Neighborhood Councils	Tolley, Luke
13	2/17/2026	Grandview/Thorpe Neighborhood Council	2. Community Assembly and Neighborhood Councils	Grandview/Thorpe Neighborhood Council
14	2/11/2026	North Indian Trail Neighborhood Council	2. Community Assembly and Neighborhood Councils	Knechtel, Dan
15	2/12/2026	350Spokane Interfaith Committee	3. Organizations	Farness, Janet
16	3/5/2026	Downtown Spokane Partnership	3. Organizations	Cameron, Emilie
17	2/18/2026	Friends of Spokane Trees	3. Organizations	Stohr, Mary K.
18	2/18/2026	Futurewise	3. Organizations	Frickleton, Brooke

#	Date	Organization	Type	Commenter
19	2/18/2026	Gonzaga Institute for Climate, Water, & the Environment	3. Organizations	Jester, Dante
20	2/18/2026	Painter Preservation	3. Organizations	Painter, Diana J.
21	1/21/2026	Rockwood Retirement Communities	3. Organizations	Maxwell, Jim
22	2/18/2026	Spokane Falls Community College Environmental Club	3. Organizations	Hultman, Ella
23	2/18/2026	Spokane Riverkeeper	3. Organizations	Scott, Katelyn
24	2/17/2026	Visit Spokane	3. Organizations	Noble, Rose

G-2. Commenters – Individuals

#	Date	Name
25	2/17/2026	Addy, Prudence
26	3/2/2026	Adler, Diane
27	2/18/2026	Agee, Alyssa
28	2/19/2026	Ahlborn, Yvonne
29	3/5/2026	Allen, David
30	2/18/2026	Allen, Joshua
31	2/17/2026	Amidon, Andy
32	2/18/2026	Angell, Kirsten
33	3/5/2026	Apple, Robert
34	2/17/2026	Arksey, Meredith
35	2/17/2026	Barry, Jane
36	2/18/2026	Bartoo Jacobson, Mari
37	2/18/2026	Bauer, Sara
38	3/5/2026	Bender, Thomas J
39	2/18/2026	Benefield, Jeff
40	1/14/2026	Bennett, Blaine & Marcella
41	2/17/2026	Bienemann, Tom
42	2/18/2026	Bishop, Mary
43	2/18/2026	Blalock, Carma
44	2/18/2026	Blessing, Sommer
45	2/18/2026	Boardman, Julie & Laverne, Hopson, Charles
46	2/19/2026	Bowden, Kristel
47	2/18/2026	Boyle, Dee
48	2/18/2026	Boyle, Mark
49	2/18/2026	Brake, Gene
50	2/17/2026	Breithaupt, Ciera
51	2/18/2026	Brooks, Kerry
52	2/18/2026	Brower, Erin
53	3/5/2026	Bruya, Ed
54	2/18/2026	Burchell, Melissa A
55	2/18/2026	Burroughs, Sarah
56	2/18/2026	Carr, Julia
57	1/20/2026	Carroll, Linda
58	2/17/2026	Chitwood, Kathryn D
59	2/5/2026	Comstock, Tanya
60	2/17/2026	Christopherson, Deanette
61	2/6/2026	Comstock, Tanya
62	2/18/2026	Conlin, Karen
63	2/21/2026	Cooke, Mayson
64	2/18/2026	Coppen, Chris
65	2/17/2026	Cordero, Julie
66	2/17/2026	Costello, Eve
67	2/13/2026	Crabtree, Margot
68	2/18/2026	Daehlin, Gail
69	2/26/2026	Daniel, Cait
70	3/5/2026	Darrell, Virginia
71	2/17/2026	Dascher, Erin
72	3/5/2026	Davi, Vincent
73	2/18/2026	Davis, Jodie
74	2/18/2026	Diko, Timothy
75	2/18/2026	Drobny, Julie
76	2/17/2026	Edmondson, John
77	2/18/2026	Edwards, Karen
78	2/24/2026	Ellis, Carol
79	3/5/2026	Erickson, Leah
80	2/18/2026	Ferguson, Catherine
81	2/16/2026	Firstwater, Francesca
82	2/18/2026	Flint, Chantelle
83	2/15/2026	Flowers, Robert
84	2/16/2026	Fougere, Merry
85	2/17/2026	Frank, Jim
86	3/5/2026	Gilbert, Morna
87	2/17/2026	Gill, Anthony
88	2/17/2026	Glanz-Kreutz, Crystal
89	2/18/2026	Gobel, Sylvia
90	2/18/2026	Goldschlag, Daya
91	3/5/2026	Gordon, Scott
92	3/5/2026	Gulick, Leah
93	2/18/2026	Hall, Jennifer
94	1/20/2026	Haller, Justin
95	3/5/2026	Hancock, John
96	2/18/2026	Hansold, Ted
97	2/19/2026	Harryman, Darla
98	3/5/2026	Haught, Lunell
99	3/5/2026	Hawk, Jonas
100	2/18/2026	Hermrmann, Lesley
101	2/18/2026	Hieb, Carlee
102	2/16/2026	Hiles, Henry
103	2/18/2026	Honebein, Karli
104	2/18/2026	Hughes, MK
105	12/24/2025	Hughes, Ryan
106	3/5/2026	Jennifer
107	2/27/2026	Joeschke, Heather
108	2/16/2026	Johnson, Nicholas

#	Date	Name
109	2/17/2026	Jones, Theresa
110	2/17/2026	Jurado, Hannah
111	2/18/2026	Kazura, Eileen
112	2/18/2026	Keller-Mikkelsen, Megan
113	2/18/2026	Kennedy-Gibbens, Gabriel
114	2/18/2026	Khouja, Sahara
115	3/1/2026	Kleinknecht, Jake
116	2/18/2026	Klingback, Millayna
117	2/18/2026	Koedding, Jaime
118	2/18/2026	Lambert, Jeff
119	3/5/2026	Lambert, Jeff
120	2/13/2026	Landa-McVicker, Carol
121	2/15/2026	Landa-McVicker, Carol
122	2/17/2026	Lane, Katherine
123	2/18/2026	Little, Bradford & Shannon
124	2/18/2026	Lowe, John
125	2/18/2026	Mace, Sam
126	2/18/2026	Maloney, Mimi
127	2/18/2026	Marcusen, Nathan
128	2/12/2026	Marr, Shenandoah
129	2/16/2026	Marshall, Molly
130	1/3/2026	Martin, Ann
131	1/21/2026	Martin, Ann
132	2/18/2026	Martincic, Dubravka
133	2/18/2026	McGee, Teresa
134	2/18/2026	McGee, Tye
135	2/17/2026	McGuirey, Stephanie
136	2/18/2026	McMillan, Destiny
137	2/18/2026	Meenach, Erin
138	2/16/2026	Mobley, Karen
139	12/31/2025	Mosher, Thomas
140	2/17/2026	Mrgudic, Kate
141	2/18/2026	Nagel, Mary & Dean
142	2/17/2026	Nault, Patricia
143	2/18/2026	Nayeli, Liva
144	2/17/2026	Newhouse, Katie & Emil
145	2/17/2026	Newhouse, Katie & Emil
146	2/18/2026	Noll, Judy
147	2/15/2026	Ogden, Jennifer
148	3/5/2026	Ohman, David
149	2/13/2026	Orcasitas, Bre
150	2/16/2026	Ortiz, Christi
151	2/18/2026	Petersen, Mike
152	3/5/2026	Peterson, Heidi
153	3/5/2026	Phillips, Sally
154	2/18/2026	Porter, Joshua
155	2/18/2026	Potts, Tim
156	2/17/2026	Reizik, Agnes
157	2/18/2026	Rhodes, Mark Walker
158	3/5/2026	Rip, Saul
159	2/17/2026	Rising, Erin
160	2/18/2026	Robidoux, Leilani
161	2/18/2026	Robinson, Danyelle
162	2/18/2026	Rodriguez, Lori
163	2/18/2026	Rodriguez, Lori
164	2/17/2026	Ronningen, Nicole
165	2/18/2026	Rookwood, Sevven
166	2/18/2026	Rowe, Deborah K
167	2/18/2026	Rowe, Hal
168	2/18/2026	Rusev Dawley, Amy
169	2/18/2026	Scanlan, Terra
170	3/5/2026	Schubach, Richard
171	2/18/2026	Schultz, Riley
172	2/17/2026	Shumacher De Donato, Elisabeth
173	2/18/2026	Smiskin, Kimberly
174	2/18/2026	Smith, Logan
175	2/19/2026	Snow, North
176	2/18/2026	Soderquist, Jordan
177	2/16/2026	Soeldner, W. Thomas
178	2/25/2026	Spurr, Jessica
179	2/18/2026	Stempf, Debbie
180	2/18/2026	Stenersen, Mark
181	1/12/2026	Stohr, Mary K.
182	2/18/2026	Stowe, Anna
183	2/18/2026	Sumner, Lorraine
184	2/17/2026	Swan, Kaiulani
185	3/5/2026	Taylor, Liam J
186	2/18/2026	Taylor, Todd
187	2/18/2026	Terjeson, Shawn
188	2/10/2026	Tomsic, Carol
189	2/17/2026	VanDeest, Konrad
190	2/17/2026	VanDeest, Stefani
191	2/9/2026	VanMansum, Lisa
192	2/18/2026	Varona, Darcy
193	3/6/2026	Vaughan, J.
194	3/5/2026	Vermilion, Megan
195	2/18/2026	Waddle, Lisa

#	Date	Name
196	2/18/2026	Wallingford, John
197	2/18/2026	Ward, Melissa
198	2/18/2026	Welki, Leah
199	2/18/2026	Wiltshire, Megan

#	Date	Name
200	2/17/2026	Worley, Patty
201	12/21/2025	Yach, Leslie Gail & Steven
202	2/17/2026	Young, Jim
203	2/18/2026	Young, Jim

From: Matheson, Caj
To: Plan Spokane
Cc: Laumatia, Laura; James, Aiyana
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 8:22:30 PM
Attachments: CDA Tribe DEIS Comp Comments.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Good Afternoon,

Attached is the Coeur d'Alene Tribe's official comment for the City of Spokane's Draft Environmental Impact Statement (EIS) as part of the PlanSpokane Periodic Update to the Comprehensive Plan. We appreciate the opportunity to provide comments on the document, and we look forward to hearing from you with feedback.

Thank you,

Caj Matheson, Director
Coeur d'Alene Tribe Department of Natural Resources

This email and any attached files are confidential and intended solely for the intended recipient(s). If you are not the named recipient(s), you should not read, distribute, copy or alter this message. Any views or opinions expressed herein are those of the author and do not represent those of the Coeur d'Alene Tribe. Warning: Although precautions have been taken to ensure no viruses are present, the Coeur d'Alene Tribe cannot accept responsibility for any loss or damage that may occur from the use of this email or attachments.

Comment # 1

COEUR D'ALENE TRIBE

CHIEF J. ALLAN CHAIRMAN
P.O. BOX 408
PLUMMER, IDAHO 83851
Phone: (208) 686-5403 Fax: (208) 686-8813
Email: chairman@cdatribe-nsn.gov

This is the Coeur d'Alene Tribe's official comment for the City of Spokane's Draft Environmental Impact Statement (EIS) as part of the PlanSpokane Periodic Update to the Comprehensive Plan.

February 18, 2026

To whom this may concern,

As you may know, the Coeur d'Alene Tribe, or schitsu'umsh as we traditionally call ourselves, have current reservation boundaries located in the State of Idaho, less than 45 miles southeast of the City of Spokane, with various off-reservation tribally–owned properties, one of which is located within the southern city limits of Spokane. Before the current boundaries were established, we resided across our aboriginal territory, which spanned from western Montana, across northern Idaho, and over to eastern Washington. This includes the land now identified as the City of Spokane, documented by an 1887 Treaty with the United States which codified the 1873 Executive Order that first established the Reservation boundaries. Like other Tribes in the area, Coeur d'Alene people were not nomadic, but had villages established along the Coeur d'Alene, St. Joe, Clark Fork and Spokane Rivers, and numerous permanent sites on the shores of Coeur d'Alene Lake, Lake Pend Orielle, and Hayden Lake. Though our modern boundaries do not consider the longevity of schitsu'umsh presence in the State of Washington, we appreciate and acknowledge it as our homeland.

A

After reviewing the 614-page draft document, we were expecting to receive acknowledgement of our historical and current presence on the land but only saw mention of contributing to the planning of this statement. From our understanding after reading the document, this is referencing the email distributed to the 70+ contacts listed on Page ix about the notice of availability of the Draft EIS, which included the Coeur d'Alene Tribe. Our history of existence on the land that Spokane now resides on stretches over millennia, and we do not feel that this is accurately represented in the Draft Environmental Impact Statement that the City of Spokane has put out for review and comment.

The Coeur d'Alene Tribe has a long-documented history of coexisting with the water, land, and other tribes of the Spokane region, whether that be inhabiting the land along the Spokane River, gathering at Spokane Falls to fish and meet with our neighbor tribes, or gathering traditionally significant plants in the surrounding prairies. The waterways of the region act as our provider of spiritual and physical livelihood and are at the heart of our landscape-based seasonal calendar that we live by which depicts seasonal indicators that have been critical to schitsu'umsh people in informing us of our interactions with our lands and waters, as well as our movements through our homeland. Our connection to the bodies of water in the area are emphasized in this calendar, with the Spokane River being one that remains central.

We kindly request that in the Environmental Impact Statement the City of Spokane provide recognition of being on aboriginal territory of the Coeur d'Alene Tribe, and include the acknowledgement of the land, water, and resources as being part of our historical and ongoing cultural identity. We are prepared to collaborate further on this effort to include our accurate representation of existence on the land, and we encourage you to consider our concerns with an intent to strengthen the relationship between the City of Spokane and the Coeur d'Alene Tribe.

We understand your long-lasting relationship with the Spokane Tribe of Indians, and we respect your coordination with them in ensuring that their identity is represented. In no way are any of these comments made to erase or undermine their acknowledgement and involvement with the City of Spokane. We only hope that we, too, can show the community of the Spokane region how significant the land they reside on is to the identity of the Coeur d'Alene people.

A

If you would like to further this discussion regarding our involvement in editing the mentions of the Coeur d'Alene Tribe in the Draft Environmental Impact Statement, we would be more than happy to take proper action to move this forward. Thank you for giving us the opportunity to comment. We look forward to hearing from you.

Sincerely,

Chief Allan

Chairman, Coeur d'Alene Tribe

From: DNR RE SEPACENTER
To: Plan Spokane
Cc: Sears, Tricia (DNR)
Subject: PlanSpokane 2046 Draft EIS Comments: WGS DNR
Date: Tuesday, January 6, 2026 7:34:07 AM
Attachments: image001.png

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Good morning Tirrell,

Thank you for the opportunity to comment on Spokane's Comprehensive Plan Draft EIS, SEPA #202505187. Please accept the comments below from WGS of DNR for consideration.

Kind regards,

Emma Oliver
SEPA External Affairs Coordinator
Office of Legal Affairs & Business Practices
Washington State Department of Natural Resources (DNR)
(360) 902-1709
Emma.Oliver@DNR.wa.gov
www.dnr.wa.gov

From: Sears, Tricia (DNR) <Tricia.Sears@dnr.wa.gov>
Sent: Tuesday, December 30, 2025 10:51 AM
To: DNR RE SEPACENTER <SEPACENTER@dnr.wa.gov>
Subject: RE: City of Spokane Comprehensive Plan Periodic Update Draft EIS Comments Due 2/18/26 by 5pm

Hi Emma,

I reviewed the document you attached to the email, Notice of Availability_Draft EIS.pdf. The document states, **"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**." It also states, "Spokane is preparing a periodic update to the City's Comprehensive Plan for 20 years, from 2026 to 2046." It provides a link to the Draft EIS, Draft Environmental Impact Statement - City of Spokane, Washington, in full and summary form. On page 3 of the summary, under objectives, it's great to see "Protect Critical Areas by updating critical area regulations to reflect best available science." This summary document is excellent, the information is easy to understand and it is aesthetically pleasing. Having the maps is great! It would be interesting

A

to have numbers like the anticipated amount of critical areas impacted for the three alternatives. Overall, well done on the summary. I did not do a detailed review of the 614-page full EIS. I did do a quick word search for the word geologic, and it was found eleven times in the survey. If you haven't checked out the Washington Geologic Information Portal, please do so for best available science, Geologic Information Portal | Department of Natural Resources. B

On the link you sent for the Spokane Comprehensive Plan, I found this document. Chapter 9 - Natural Environment - Oct 22, 2025 Draft

Overall, Chapter 9 is well written but is brief in terms of describing more than the goals and policies. Based on the notes in the blue side bar, it appears more information is forthcoming. It's good to see the comments about cross referencing information as that is helpful to the reader. Additional information such as stating what the critical areas are for Spokane, specifically, and noting map references and or including maps, is useful. C

Page 1 includes a nice description of the update, along with the "Natural Environment Score Card," and a description of the useful icons. C

Page 3 has Policy NE 1.5 Mining Activities. It's good to see a policy included for mining.

Page 5 has Goal NE-6 Natural Landforms. Good.

Page 6 has Goal NE-7 Areas of Geologic Concern. Good. It's great to see the policies with the goal, especially with the identification and mapping aspects. C

Page 7 has Goal NE-9 Sustainable Economies and Employment. Great.

Thank you for the opportunity to review and comment. I will look forward to seeing the future editions of the Spokane Comprehensive Plan, and other related information.

Cheerio,
Tricia

Tricia R. Sears (she/her/hers)
Geologic Planning Liaison
Washington Geological Survey (WGS)
Washington Department of Natural Resources (DNR)
Cell: 360-628-2867 | Email: tricia.sears@dnr.wa.gov

From: DNR RE SEPACENTER <SEPACENTER@dnr.wa.gov>
Sent: Monday, December 22, 2025 7:35 AM
To: Sears, Tricia (DNR) <Tricia.Sears@dnr.wa.gov>; STENBECK, ANDREW (DNR) <ANDREW.STENBECK@dnr.wa.gov>

Subject: FW: City of Spokane Comprehensive Plan Periodic Update Draft EIS Comments Due 2/18/26 by 5pm

Hello,

Updates for City of Spokane's Comprehensive Plan can be found here: https://my.spokanecity.org/planspokane/

Comments on the EIS are due by February 18th.

Thank you,

Emma Oliver
SEPA External Affairs Coordinator
Office of Legal Affairs & Business Practices
Washington State Department of Natural Resources (DNR)
(360) 902-1709
Emma.Oliver@DNR.wa.gov
www.dnr.wa.gov

From: Plan Spokane <eraplanspokane@spokanecity.org>
Sent: Thursday, December 18, 2025 1:25 PM
Cc: Black, Tirrell <tblack@spokanecity.org>
Subject: City of Spokane Comprehensive Plan Periodic Update Draft EIS Comments Due 2/18/26 by 5pm

External Email

Good afternoon,

The City of Spokane is preparing a periodic update to the City's Comprehensive Plan, due in 2026 and through the horizon of 2046. In February 2025, a Determination of Significance and Request for Comments on Scope of Environmental Impact Statement was issued. The City of Spokane is now issuing a Notice of Availability of **Draft Environmental Impact Statement (EIS)** and Notice of SEPA Infill Exemption and Raising of Minor New Construction Thresholds. The Draft EIS presents three alternatives to test different growth patterns and policies to consider the impacts and potential mitigation steps of the current Comprehensive Plan and code, as well as two action alternatives. The Draft EIS can be found at the project webpage: https://my.spokanecity.org/planspokane/draft-eis/.

Agencies, affected Tribes, and members of the public are invited to comment on the Draft Environmental Impact Statement during a 60-day comment period. You may comment on the growth alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required.

Written Comments: The comment period is open from **December 18, 2025 to February 18, 2026**. Comments are due by **5:00 PM, February 18, 2026**.

Comments may be submitted two ways: (1) by email to **Tirrell Black**, *Assistant Planning Director,* PlanSpokane@spokanecity.org, with the subject line "PlanSpokane 2046 Draft EIS Comments", or (2) by letter to:

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

In addition to written comments, Agency Staff and Tribal Staff are invited to attend a hybrid **Agency and Tribes Workshop** on **Tuesday, January 6 from 9:30-11:30 at Spokane City Hall, City Council Briefing Center (Lower Floor)**. Attendees are encouraged to attend in person if possible; if needed, a virtual meeting option is available in the Notice of Availability. This meeting will provide information about the Periodic Update to the Comprehensive Plan as well as the Draft Environmental Impact Statement and potential growth alternatives for the City of Spokane's next twenty years. Attendees will have the opportunity to ask questions and provide feedback, while the meeting will focus on technical analysis of interest of Agencies and Tribes.

If you wish to participate in the process as a community member, or are unable to attend the Agency and Tribes Workshop, we are also hosting community information sessions and listening hours that anyone is welcome to attend:

- **Virtual Lunch and Learn**
  This virtual lunch and learn will provide information on what the Draft Environmental Impact Statement is, key details about the growth alternatives, and how to provide feedback.
  - January 13, 2026 from 12 to 1 p.m.
  - Microsoft Teams, link available at the project webpage

- **PlanSpokane 2046 Listening Hours**
  City Planners will be out in the community to answer questions about and discuss the Draft Environmental Impact Statement. These are drop-in hours with no formal presentations.
  - January 20, 11 a.m. to 1 p.m., Spokane City Council, Tribal Room (Lobby)

- February 3, 4 to 6 p.m., Hillyard Library, Events Room
- February 5, 3 to 6 p.m., Liberty Park Library, Study Room A
- February 10, 4 to 6 p.m., Shadle Park Library, Studio Room
- February 12, 4 to 6 p.m., South Hill Library, Study Room A

We look forward to continuing to work with you throughout the PlanSpokane 2046 update to the Comprehensive Plan. You can learn more about the City of Spokane Draft Environmental Impact Statement at: my.spokanecity.org/planspokane/draft-eis.
Thank you,

PLANSPOKANE
Resilient | Connected | Livable | 2046

KayCee Downey, AICP *(she/her)* | City of Spokane | Planner II | Planning & Economic Development
509.625.6194 | *dept.* 509.625.6500 | kdowney@spokanecity.org |spokanecity.org

Help shape the future of the City of Spokane! Learn more about PlanSpokane 2046 at PlanSpokane.org

This email is subject to Washington State Public Records Act, Chapter 42.56 RCW, and may therefore be subject to public disclosure.

From: ECY RE ERO SEPA
To: Plan Spokane
Subject: ECY SEPA 202505187 - City of Spokane Comprehensive Plan Draft Environmental Impact Statement - Comments
Date: Tuesday, February 17, 2026 12:37:59 PM
Attachments: 202505187_ECY Comments.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Greetings,

Thank you for the opportunity to comment on the City of Spokane Comprehensive Plan Draft Environmental Impact Statement proposal. Ecology's comments are attached.

Please share these comments with the applicant.

SEPA Register No. 202505187

Thank you,

Amanda Hiebert
Washington State Department of Ecology
4601 N. Monroe St, Spokane, WA 99205

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Eastern Region Office
4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

February 17, 2026

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

Re: City of Spokane Comprehensive Plan Draft Environmental Impact Statement
Ecology SEPA# 202505187

Dear Tirrell Black:

Thank you for the opportunity to provide comments on the **City of Spokane Comprehensive Plan Draft Environmental Impact Statement**. Based on review, the Department of Ecology (Ecology) has the following comments:

Shorelands & Environmental Assistance Program
Ryan McNair, (509) 309-5547, ryan.mcnair@ecy.wa.gov

Multiple areas of proposed Urban Growth Areas show indications of critical areas.

One area of note is the West Plains UGA, north of highway 902 and south of I-90. This area observed from aerial and google street view imagery appears to contain numerous vernal pools. Vernal pools are considered a special characteristic wetland. They are extremely difficult to mitigate for and have not been able to be replicated. If found vernal pool wetlands have a high likelihood of being a high category wetland. Vernal pools are hard to delineate and even harder to find in the summer season. Surveys for these wetlands should occur from March through May. A

In addition to permitting requirements by the Department of Ecology for direct impacts to wetlands (includes vernal pools), the City of Spokane Wetlands Protection section 17E.070. outlines regulations and land uses in and around wetlands, as well as impacts to their respective buffers (17E.070.110)

These regulations should be considered when planning urban growth areas and the impact these actions will have not only on the environment but the complexity of the permitting and mitigation required. This is especially pertinent when subdividing parcels into lots that would create a reasonable use exemption (17E.070.120).

If you have any questions or would like to respond to these comments, please contact the appropriate program staff listed above. If you have questions about SEPA, please reach out to **sepahelp@ecy.wa.gov.**

Sincerely,



Amanda Hiebert
SEPA Coordinator
Eastern Region Office

From: Chesney, Scott
To: Gardner, Spencer
Cc: Plan Spokane
Subject: CoS DEIS Comments
Date: Wednesday, February 18, 2026 4:29:51 PM
Attachments: image001.png
image002.png
CoS DEIS Comments 20260218.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Spencer,

Please see the attached for comments from SpoCo Planning.

Look forward to serious joint planning in 2027.

Regards,

Scott R. Chesney, AICP | Planning Director | O: 509.477.7212 | M: 509.850.8372
Semper Prorsum
Spokane County & Planning | http://www.spokanecounty.org/BP

Comment # 4

Spokane County
WASHINGTON

PLANNING DEPARTMENT
SCOTT R. CHESNEY, AICP, DIRECTOR

February 18, 2026

Spencer Gardner, director, Planning Services, *sent via email only*
sgardner@spokanecity.org
City of Spokane City Hall
Spokane Washington 99201

Director Gardner:

Thank you for the opportunity of Spokane County Planning to comment on the draft Environmental Impact Statement for the city of Spokane.

This EIS document is well-crafted and offers significant detail for consideration of growth. We commend the city for an in-depth assessment of conditions to accommodate growth and the vision to revisit the Centers and Corridors approach for a new generation. A

We note the shift of new single-unit housing to an expected 25% of dwelling unit growth and the overall percentage difference between single-unit and multi-unit shrinking from 26% to 18%. This appears to represent a significant shift in residential lifestyle for Spokane. Spokane County encourages a vibrant residential core and downtown and hopes that this reflects a commitment by the city to create an active downtown residential development program.

The two action alternatives represent, on paper, a range of development impacts for quality of life and continued growth for a vibrant city – a collection of great neighborhoods.

Alternative Two continues the Centers and Corridors concept but simplifies the regulatory system to encourage higher intensity growth along transit corridors.

Alternative Three appears to project a stronger downtown/core growth and focused regional hubs, diminishing the role of corridors. Spokane County Planning supports this planning and visioning approach. The lack of a designated regional center on the West Plains suggests a role for a 2027 Sub area joint plan to create such a hub that can serve a broader geographic base. B

There are three areas of interest to Spokane County Planning to better ascertain the city's ability to accommodate its population, housing, and jobs projections and goals: transportation capacity, utility capacity, and public policy alignment with the neighborhoods and the market. C

Exhibit 3.7-14 shares thresholds of significance and shows an acknowledgement of the impact of the action alternatives, including the data in Exhibit 3.7-15, and summary Exhibit 3.7-25. We cannot find D

any capital facility estimates for the level of these impacts to determine a sustainable implementation program. The DEIS notes in 3.83 that the action alternatives will require a new capital facilities plan. D

Public Services discusses the range of needed and desired services for a vibrant city. There is no discussion as to whether the fire department can meet its turnout times, response times, etc. (3-294) E

Spokane has wonderful parks that are a true jewel of the city and region. This DEIS does not address how a level of service will be maintained with the forecast growth, including an assessment of land needed to maintain that LOS as part of an infill strategy. F

For water, wastewater, and stormwater, Spokane County has questions.

Spokane is fortunate to have the water supply and quality of its system and is commended for the diligence in maintaining that service for all residents and customers. Exhibit 3.9-7 shows the growth of ERU& by TAZ based on the 2019 SRTC model for demand through 2042. There is no exhibit correlating the TAZ polygons with the projections in this DEIS, thus offering no certainty that Comp Plan 2046 growth is in areas that can accommodate increased water services. Mitigations are discussed, but no capital improvement data is offered to evaluate long-term affordability. G

The Wastewater narrative notes that the RPWRF was planned for 50 MGD with a possible expansion to 85 MGD. The DEIS does not identify current usage, nor does it project whether future growth can be accommodated in the facility. Further, physical expansion of the current site seems challenging. H

Stormwater is identified with several areas of concern, some of which overlap with planned infill development areas. The DEIS does not discuss the impact of increased impervious surface or the overburdening of the CSO system as a result. I

Spokane County Planning will need to better understand the data suggested by the narrative to support the growth projects of this DEIS, and we presume that a preferred alternative will be supported by empirical data for the city's final EIS. J

We welcome a discussion on our observations and will augment our comments as you show your work to support your final EIS.

Regards,



Scott R. Chesney, AICP, director

C: Spokane County Planning Commission

From: Black, Tirrell
To: Plan Spokane
Subject: FW: ACTION:
Date: Wednesday, February 18, 2026 3:37:15 PM
Attachments: STA-PlanSpokane 2046-EIS Comment Letter_signed_20260217.pdf

---

Tirrell Black
Planning & Economic Development
City of Spokane
tblack@spokanecity.org
509-625-6185

From: Jennings, Brian <BJennings@spokanetransit.com>
Sent: Wednesday, February 18, 2026 3:33 PM
To: Black, Tirrell <tblack@spokanecity.org>
Cc: Poole, Emily <EPoole@spokanetransit.com>; Tresidder, Mike <mtresidder@spokanetransit.com>
Subject: ACTION:

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Tirrell,

Please find attached STA's letter regarding the PlanSpokane 2046 Draft EIS. We appreciate the opportunity to discuss this document both in person at the East Central Library as well as our conference call on February 9th. Please let me know if you need anything else.

Best Regards,

Brian

Brian Jennings
Director of Community Development
Office: (509) 344-1862
Email: bjennings@spokanetransit.com

spokanetransit.com
Sign up for regular STA text and email updates

Spokane Transit

February 17, 2026

Department of Planning Services
Attn: Tirrell Black, Assistant Planning Director
808 West Spokane Falls Boulevard
Spokane, WA 99201-3333

RE: *PLANSPOKANE 2046* DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Black:

Spokane Transit Authority (STA) appreciates the work of City of Spokane staff in developing the draft environmental impact statement for *PlanSpokane 2046,* the periodic update to the City's comprehensive plan.

The City has undertaken several significant planning efforts since the last periodic update (such as the Transit Oriented Development (TOD) Framework, the South Logan TOD Plan, Division Street TOD Plan, Land Quantity Analysis and ongoing Housing Capacity Analysis, among others), and we look forward to supporting the City as they integrate these efforts into *PlanSpokane 2046.* Spokane Transit supports exploring a preferred alternative that is aimed at sustainable growth with a focus on improving mobility. Growing jobs and households in neighborhood centers, especially downtown Spokane, is complimented and enabled by providing residents with a variety of options when it comes to moving around the City. Those residents and employees who walk, cycle, or utilize fixed-route bus service will benefit from a growth alternative that focuses on increasing residential development and economic growth along the high-frequency and high-performance transit lines identified in Spokane Transit's Comprehensive Plan- *Connect Spokane*.

A

B

C

STA will always have a strong presence in downtown Spokane, and the transit initiatives in our ten-year strategic plan, *Connect 2035*, will support additional growth in the Division and Wellesley corridors. The investments we are making in transit will work well in advancing the goals of either alternative 2, alternative 3, and especially a hybrid version of those two approaches. Spokane Transit looks forward to working with the City of Spokane in 2026 to identify how the city, together with transit, will grow and thrive over the next twenty years.

D

Sincerely,

Brian Jennings
Director for Community Development
Spokane Transit Authority

1230 W Boone Ave
Spokane, WA 99201
spokanetransit.com

T (509) 325-6000
F (509) 325-6036
WA Relay 711

How a great city moves.™

From: Ryan Stewart
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, February 12, 2026 4:43:37 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello,

Thank you for the opportunity to review the transportation-related elements of the City of Spokane's PlanSpokane 2046 DEIS. Below are just a few SRTC staff comments:

Overall
SRTC Comment: The DEIS is very thorough and the analysis appears complete. SRTC staff finds no issues with the transportation-related items and only requires a little more clarification about some assumptions.

Land Use Growth Scenarios

Employment growth
Alt 1 = SRTC regional projection adjusted to year 2046 (34,850)
Alt 2 = WA ESD projection (24,939)
Alt 3 = Unclear of source (38,848)

SRTC Comment: SRTC requires the source behind the Alternative 3 projection and the details about the assumptions used in order to understand the larger growth in jobs. For example, if housing units are held constant across the alternatives, where will the larger number of employees reside? A

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

SRTC Comment: This statement is somewhat confusing as significant impacts ("Thresholds of Significance") to Performance Metrics are described but will not inhibit the city's ability to implement mitigations and strategies. The LOS and Summary of Impacts sections reference significant impacts as well (Exhibits 1.4-4 and 1.4-5 and later in 3.7-25). Request clarification. B

VMT (p.60, 1-34)

The DEIS states “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.” The correlation between VMT and safety is explained in more detail beginning on page 1-36. The SRTC RSAP is referenced on p. 3-256. C

SRTC Comment: Exhibit 1.4-6 shows the forecasted increase in per capita VMT. Alt 2 has the least growth but all three are very close. This is in line with what we saw in the VMT Reduction Framework in the City of Spokane with greater increases in outlying areas.

LOS (p.60, 1-34)

The DEIS mentions the state facilities and other regionally significant facilities. Alts. 2 and 3 have slightly better LOS than the no action at the 22 city intersections studied, though 5 intersections have failing LOS in all alternatives. Solutions/mitigations include completion of the NSC, Division BRT and other STA HPT, pedestrian and bike improvements reflected in the master plans, ADA transition plan, TDM, TSMO, complete streets, and other safety improvements. D

SRTC Comment: SRTC is supportive of the City of Spokane’s solutions and mitigations for impacts to LOS as they are consistent with the Horizon 2050 Guiding Principles and Policies.

Intersection LOS (p.346, 3-233)

“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.” E

SRTC Comment: SRTC does not use intersection LOS as a measure for analysis. SRTC is a regional planning agency and uses Regional Mobility Corridor LOS as well as countywide metrics for level of service evaluation. Please see the SRTC Comprehensive Plan Certification Checklist (Attachment A, beginning on page 2) for a description of SRTC’s multimodal level of service methodology.

Volume-to-Capacity Ratio (v/c) Summary (p.347, 3-234)

“Transportation agencies like WSDOT and SRTC use v/c ratios to evaluate system performance, identify deficiencies, and prioritize improvements in corridor planning and F

environmental review."

SRTC Comment: SRTC does not use V/C ratios as a performance metric unless it is part of a subarea or corridor-level study. F

Regulatory Context (p.374, 3-261)
References Horizon 2045 and RSAP.

SRTC Comment: Request updated reference to Horizon 2050. G

SRTC Comment: The section about the City's ADA Transition Plan does not reference analysis of impacts to adjacent jurisdictions that is required in RCW 36.70A (6)(a)(G)(v). This could be included in the Transportation Chapter when it is released but will be an ongoing discussion with the City and other jurisdictions. H

Summary of Impacts (p.396, 3-283)
SRTC Comment: Exhibit 3.7-25 is confusing. For some of the "Impact Types" under Alts 2 and 3, it states "No additional impacts beyond No Action" but the Alt 1 has a "Significant Impact" – doesn't this mean they still have a significant impact? It is understood that the mitigation measures for Alts 2 and 3 lessen the impacts but the wording is still confusing. Request clarification. I

SEPA exemption under RCW 43.21C.229 (p.398, 3-285)
"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."

SRTC Comment: This appears to be a reasonable approach. Please include SRTC in the regional coordination of the transportation impact analysis. J

Appendix C Transportation Project implementation Table (p.589, 5-11)
SRTC Comment: All projects are consistent with Horizon 2050 and recent regional study efforts (e.g., US 195/I-90 Study, DivisionConnects, US 2 West Plains studies). K

Please let me know if you have any questions or require additional information.

Ryan Stewart, AICP
Principal Transportation Planner
Spokane Regional Transportation Council
421 W Riverside Ave Suite 500 | Spokane, WA 99201
(509) 343-6395
This communication is public record and may be subject to disclosure per the Washington State Public Records Act, RCW 42.56

From:	Clarke, Corey J.
To:	Plan Spokane
Cc:	Black, Tirrell; Harshman, Shauna C.; Figg, Greg J.; Sean Messner; benjamin.serr; Ryan Stewart; Chesney, Scott
Subject:	PlanSpokane 2046 Draft EIS Comments - WSDOT Additional Comments
Date:	Thursday, March 5, 2026 2:29:21 PM
Attachments:	PlanSpokane 2046 DEIS - Additional WSDOT Comments.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello all,

Please find attached additional WSDOT comments on the PlanSpokane DEIS.

Thank you for the opportunity to review the documentation. We look forward to continued collaboration.

Corey Clarke
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March 5, 2026

Tirrell Black
Assistant Director
City of Spokane Planning & Economic Development
808 W. Spokane Falls Blvd.
Spokane, WA 99201

RE: Additional WSDOT Comments – PlanSpokane 2046 Draft Environmental Impact Statement

Ms. Black,

As a follow up to our initial comments, which were submitted February 18, 2026, after review of the additional material provided by the City of Spokane and their consultants, WSDOT has the following comments on the PlanSpokane 2046 Draft Environmental Impact Statement (DEIS):

In general, the TAZ information provided matches the model outputs provided for each scenario. A review of the TAZ's in question reveal that the number of trips assigned to the networks does align with each proposed scenario.

Looking at the DEIS summary of employment growth, specifically in the West Plains TAZ's, it does not align with the TAZ information provided. Little employment growth is modeled in Alternative 2 or 3 in comparison to Alternative 1, based on the TAZ data provided. Alternative 2 shows an increase in 14 employment units and Alternative 3 shows an increase in 538 employment units in the West Plains in comparison to Alternative 1.

The trips generated for industrial areas near the Transload Facility along Craig Road and future industrial areas around the Spokane International Airport are not commensurate with proposed land use densities proposed.

A

Further review of the TAZ centroid connectors was completed, with the following comments:

1. The centroid connectors for TAZ's 1842, 1850, and 1861 are not loading the roadway network in alignment with either existing or proposed development in all 3 alternatives.
    a. TAZ 1842 and 1850 each have a single centroid connector to Thorpe, close to Assembly.

B

i. These TAZs should have multiple centroid connectors to Thorpe reflective of existing and future development connection points. B

b. TAZ 1861 has 2 centroid connectors – one to Cheney Spokane and one to Meadow Mist.

i. This TAZ has connectivity to Thorpe and should have a centroid connector to Thorpe.

ii. Distributions to Meadow Mist are high and should be reduced with the connection to Thorpe.

2. The centroid connectors for TAZ 5512 do not load the roadway network in alignment with either existing or proposed development in all 3 alternatives. C

a. Few existing or future businesses have direct access to Electric Avenue, with the majority using Gieger Bouelvard. The TAZ distributions should be adjusted to reflect existing and proposed access – mainly to Geiger Boulevard.

3. The centroid connectors for TAZ 5501 do not load the roadway network in alignment with either existing or proposed development in all 3 alternatives. D

a. Few trips are loading to 21st Avenue. Adjustments to the TAZ centroid connectors should be made to allocate more TAZ trips to 21st Avenue.

4. The centroid connectors for TAZ 5271 do not load the roadway network in alignment with either existing or proposed development in all 3 alternatives. E

a. Few trips are loading to Valley Springs. And the TAZ has, and will have, very little development access the roadway network to the south.

b. The 2nd centroid connector should be located to Valley Springs to reflect existing and future development connections.

5. The centroid connectors for TAZ 290 and 340 are not loading the roadway network in alignment with either existing or proposed development in all 3 alternatives. F

a. There is no centroid connector to State Route 291 (SR-291) for either TAZ, yet there is existing development and future development that will have direct access to SR-291.

b. Centroid connectors should be coded to SR-291 from each TAZ with a portion of the planned households distributed to SR-291.

WSDOT thanks the City of Spokane for granting an extension of review time and for providing the documents and data necessary to provide a complete review. As always, we welcome collaboration and are glad to discuss our comments in person.

Please do not hesitate to contact me if you have any questions regarding these comments.

Sincerely,



Corey Clarke
Development Services Office
WSDOT – Eastern Region

cc: Greg Figg - WSDOT
Shauna Harshman - WSDOT
Ben Serr – Department of Commerce
Scott Chesney – Spokane County
Ryan Stewart - SRTC

From:	Figg, Greg J.
To:	Plan Spokane
Cc:	Harshman, Shauna C.; Black, Tirrell; Clarke, Corey J.; benjamin.serr; Ryan Stewart; Chesney, Scott; Sean Messner
Subject:	PlanSpokane 2046 Draft EIS Comments
Date:	Wednesday, February 18, 2026 4:21:25 PM
Attachments:	WSDOT City of Spokane Comp Plan Comments.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Good Afternoon All,

Please find attached the WSDOT comments on the DEIS for the comprehensive plan. Thank you again for the opportunity to review this document.
Best Regards,

Greg Figg
Development Services Manager
WSDOT Eastern Region
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February 18, 2026

Tirrell Black
Assistant Director
City of Spokane Planning & Economic Development
808 W. Spokane Falls Blvd.
Spokane, WA 99201

RE: PlanSpokane 2046 Draft Environmental Impact Statement – WSDOT Comments

Ms. Black,

WSDOT has reviewed the PlanSpokane Draft Environmental Impact Statement (DEIS), which was released for public comment on December 18, 2025, along with the additional supplemental material received to date. As an initial matter, WSDOT has not yet received all of the requested supplemental materials it needs to provide a complete comment. Therefore, this comment is incomplete as to information that has been requested but not yet been provided. Nevertheless, after our review of the material received, WSDOT has the following comments:

Traffic Impacts to State Transportation Facilities

1. The modeling along Division Avenue/US-2 does not appear to account for the BRT that is planned, which is included in the Comprehensive Plan.
    a. The capacities along Division Avenue/US-2 continue to reflect the 3-lanes per direction and should be reduced to 2-lanes of capacity for the future and approved BRT lane.
    b. This may cause traffic to shift to other regional routes and may impact the US-2 corridor, amongst others.

A

2. The land use growth and trip generation of the 3 alternatives, west of US-195 and south of I-90, are not able to be confirmed based on the limited information provided.
    a. Impacts along US-195 were not analyzed and may not account for all trips associated with recently approved land use allocations.
    b. Key locations that analysis is being sought include US-195/Thorpe, US-195/I-90, the J-Turn locations on US-195, and Hatch Road/US-195. This analysis is not included in the DEIS.

B

3. Modeling in the West Plains (south of US-2, north of I-90, east of Fairchild) does not reflect the land uses proposed in the DEIS.
    a. Specifically, projected volumes along the 21st Avenue corridor, in many locations, are zero. This corridor is being developed as a parallel arterial to US 2.

C

b. Projected volumes associated with TAZs are very low for projected land use densities proposed in all alternatives, especially in Alternative 3.
c. US-2 volumes at I-90 show volumes exceeding capacity. No mitigation was proposed to accommodate planned land uses either on the State or Local network. C
d. One (1) intersection (Flint Rd./US-2) was analyzed along US-2. Additional intersections are being requested as several locations have failures (LOS below approved standards) today and limited ability to accommodate additional growth.

4. Modeling along SR-291 does not appear to include all planned growth as shown in the proposed land uses.
   a. One (1) intersection (Alberta St./SR-291) along SR-291 was analyzed. Additional intersections are being requested as several locations have poor operations/level of service today. D
   b. Upon inspection of the travel demand model output, limited growth is shown to come from the vacant land north of Francis Avenue/SR-291 in all three alternatives.
5. Modeling along US-395, near Wellesley Avenue, does not appear to incorporate planned growth as shown in the land use proposals. E
   a. Analysis was not completed at the Wellesley Avenue intersections with US-395 ramps; therefore it is uncertain what impacts the land use will have on WSDOT facilities.
6. Additional peak hour trip information from the travel demand model at specific TAZ's of concern has been requested and WSDOT is awaiting this information. F
7. Upon review of the GIS information provided, several WSDOT facilities are projected to be over capacity with all land use alternatives reviewed. WSDOT is concerned with the City implementing SEPA exemptions with any alternative without additional analysis supporting that adequate facilities are provided with proposed development. G
8. In our requests for additional information some of the documents received are dated after the issuance of the DEIS. Was this information considered as part of the DEIS analysis? H
9. Pursuant to RCW 36.70A.070, intergovernmental coordination is required. The DEIS does not clearly describe how impacts to the state transportation system were analyzed in coordination with WSDOT and affected neighboring jurisdictions. Please identify the coordination conducted, the assumptions used, and how cross-jurisdictional impacts to state facilities were evaluated and addressed. I
10. RCW 36.70A.070 also requires that transportation elements ensure adopted level-of-service standards are maintained and that impacts of planned growth are addressed. Absent this analysis and coordination, the EIS does not demonstrate consistency with the Growth Management Act requirements governing transportation elements and intergovernmental coordination. J

WSDOT requests that the above comments be fully addressed in the revised EIS and that mitigation measures sufficient to maintain WSDOT's adopted level-of-service standards be identified, evaluated, and incorporated where impacts are identified. WSDOT welcomes the opportunity to meet and collaborate with the City of Spokane to ensure these comments are addressed prior to the Final EIS being issued.

SEPA Categorical Exemptions

To adopt the proposed SEPA exemptions, the City must analyze the impacts to the transportation system—including state facilities—in the comprehensive plan environmental impact analysis, with impacts identified. WSDOT is concerned that the transportation analysis in the DEIS largely does not address impacts to the state highway system where growth is expected. For instance, along the US-195 corridor, where significant residential development is expected, only one screenline was analyzed. The capacity, level of service (LOS), safety, and operational issues will primarily be at intersections that are at grade, such as those along US-195. The screenline is useful to check volumes but is not a tool to identify intersection LOS issues. If the City did consider this, WSDOT was not provided the necessary documentation that would support the City's conclusion.

Additionally, in order to meet the requirement of RCW 43.21c.229(3) the City must consult with WSDOT and document those consultations as well as the impacts and mitigating measures. If the optional SEPA exemptions are desired by the City, additional transportation analysis is required for the state transportation facilities, and any necessary mitigations must be identified. K

It should be noted that not all of the needed mitigations are identified in the City's impact fee ordinance, nor can impact fees fund the needed mitigation as they typically only cover 30%-40% of the cost of an improvement.

WSDOT requests a meeting with the City to identify those areas that will be impacted by the growth projected in the DEIS. This will allow a more targeted analysis of those areas.

Request for an Extension of Review Time

WSDOT formally requests an extension of time to provide a complete comment to the DEIS. While the DEIS did have a 60-day public comment period, the data necessary for WSDOT's complete review of the DEIS was not received in a timely manner, essentially preventing WSDOT from the benefit of a full 60-days to comment. Furthermore, the requirement to complete a Public Records Request to obtain information undermines the spirit of coordination that WSDOT seeks with the City of Spokane and is intended by the statute. L

Also, it is unclear if the City of Spokane had all of the information necessary to come to the conclusions made in the DEIS—particularly that there will be no adverse impacts to the state transportation system—as a portion of the transportation and land use data necessary for our review of the impacts was not readily available when requested. WSDOT maintains responsibility for the safety and operations of the state highway system, and the additional information requested from the City of Spokane is necessary to determine if there will be any probable significant adverse impacts resulting from this Comprehensive Plan Update, and to identify possible mitigating measures. M

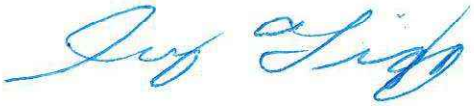
To date, WSDOT has not received all of the data necessary to undertake a complete review of the DEIS. In particular, WSDOT has not received the trip generation and volume data from the TAZ's of concern that impact the highway system. Without this data WSDOT is unable to confirm the planned development's impacts to the state highway system. As such, WSDOT requests a 15-day extension from the time all of the currently requested data is received.

Below is a brief outline of WSDOT's requests for additional information regarding the DEIS:

12/17 – WSDOT requests data from City of Spokane necessary for review of the forthcoming DEIS.
12/18 – DEIS released for 60-day public review.
12/18 – WSDOT instructed by City of Spokane to submit a public records request to receive data necessary for review.
1/7 – WSDOT requests meeting with City of Spokane and Fehr & Peers to discuss the unreceived data requested on 12/17.
1/12 – WSDOT receives a portion of requested data from City of Spokane. Separate memorandums provided on 1/12/2026 are dated January 7, 2026 and January 9, 2026.
1/13 – Meeting with WSDOT, City of Spokane, and Fehr & Peers. Additional necessary data is requested by WSDOT following this meeting.
1/23 – Data requested on 1/13 received by WSDOT from City of Spokane.
2/11 – WSDOT requests additional data from City of Spokane necessary for review.
2/13 – A portion of data requested on 2/11 is received by WSDOT. WSDOT is instructed to obtain an NDA from SRTC to receive the remainder of the data.
2/17 – WSDOT notifies City of Spokane NDA is, and has been, in place with SRTC for data request. No data received from City of Spokane.
2/18 – City of Spokane responds to request for data, indicating it will be a week until the data can be delivered.
2/18 – DEIS Comment Deadline, comments and request of extension of time submitted.

Please do not hesitate to contact me if you have any questions regarding these comments. As always, we welcome collaboration and are glad to discuss our comments in person.

Sincerely,



Greg Figg
Development Services Manager
WSDOT – Eastern Region

cc: Shauna Harshman - WSDOT
Ben Serr – Department of Commerce
Scott Chesney – Spokane County
Ryan Stewart - SRTC

From: Camporeale, Logan
To: Plan Spokane
Cc: Duvall, Megan
Subject: Spokane HPO Comments on Plan2046 Draft EIS
Date: Friday, January 30, 2026 5:20:16 PM
Attachments: image002.png

Good afternoon, Tirrell and team,

Our office has completed review of the draft EIS for the Comp Plan revision. We provided comments in this linked .pdf but I will also provide a brief summary of our comments below:

The Spokane Historic Preservation Office greatly appreciates that the Draft EIS recognizes the significant adverse impacts that are likely to historic and cultural resources in the contemplated growth alternatives. However, our office does not think that the suggested mitigation strategies are sufficient to address the impacts, particularly to historic resources. We appreciate the proposed mitigation for cultural resources (a process modeled on the SMP process), but we think that process still needs clarity if it is to be sufficient mitigation for adverse impacts to cultural resources. As for appropriate mitigation for likely adverse impacts historic resources, our office recommends a mitigation strategy that includes proactive and preemptive survey as well as the development of a city-wide preservation plan. A

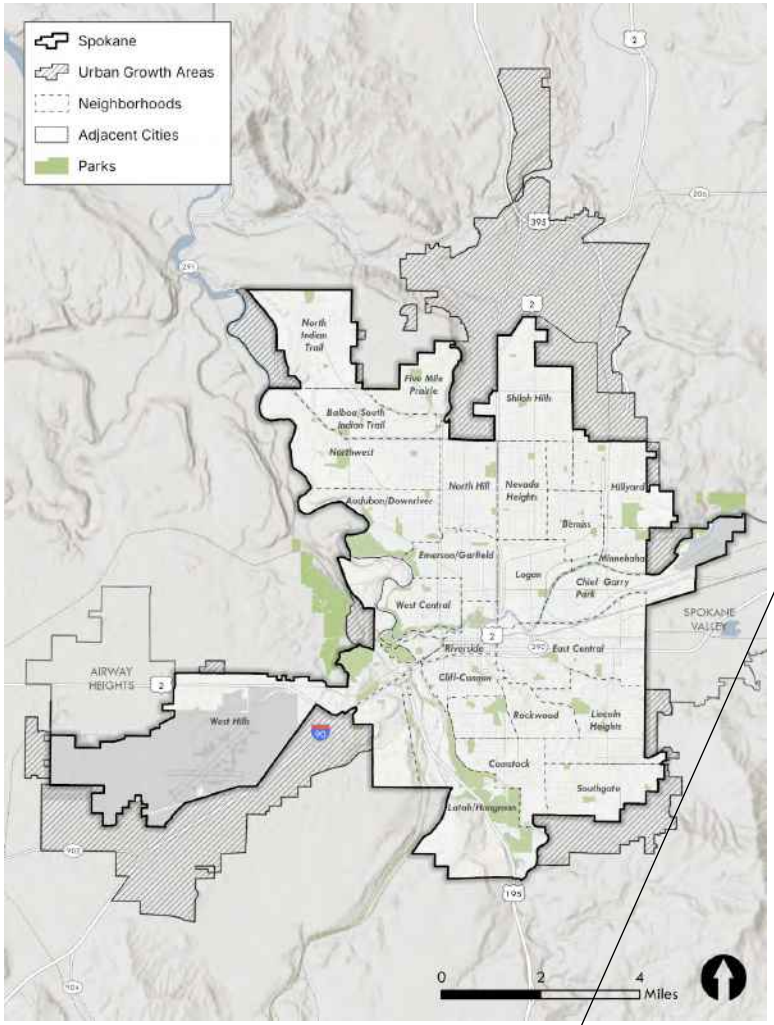
Thank you for the opportunity to provide comment. Please let us know if you have any questions!

Best,

Logan Camporeale
Historic Preservation Specialist
City/County of Spokane
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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.

Summary of Comments on FEIS008_markup.pdf

Comment # 9

Page: 30

B

Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:07:43 PM
Manito/Cannon Hill as well?

Page: 41

Comment # 9

Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:10:24 PM
Highest levels of potential impact equals high levels of mitigation.

C

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	▽	▼	▼▼

Page: 51

Comment # 9

Author: mduvall Subject: Sticky Note Date: 1/29/2026 3:16:42 PM
but more risk to historic buildings and neighborhoods.

Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:16:42 PM

D

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-

Comment # 9

Page: 52

E

Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:20:26 PM
nomination and regulation of

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 11:49:58 AM
This is a fantastic mitigation strategy as far as preventing adverse impact to CR and HP resources, but I do wonder about the workload to do the review in this decision tree with only two historic preservation staff.

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 10:49:19 AM
This is articulated well and our office appreciates the inclusion of this language.

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.

Comment # 9

Page: 53

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 10:51:02 AM
Another effective way to mitigate is to do more proactive survey of historic and cultural resources. The city has not funded any big work on that front recently and all recent large-scale survey work has been funded with federal pass-through money.

F

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 11:17:56 AM
In my opinion, formalizing this process seems especially important in light of the SEPA exemptions possibility

F

Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:23:56 PM
It feels like this is mostly concerned with archaeology (ie: "inadvertent discoveries") - how are we thinking about mitigation for actions that result in the loss of historic built environment?

F

Page: 55

Comment # 9

Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:25:28 PM
Exactly. Twice as many demolitions of existing housing units.
Author: lcamporeale Subject: Sticky Note Date: 1/30/2026 3:29:09 PM
This is a HUGE impact that I feel like needs more mitigation

G

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.

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.

Comment # 9

Page: 217

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 10:53:50 AM
Love this context setting downtown. Good writing.

Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:36:22 PM
late 19th and early 20th century buildings

Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:36:48 PM
late 19th and early 20th century

Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:38:06 PM
single unit homes in a variety of architectural styles.

Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:38:43 PM
and vary from

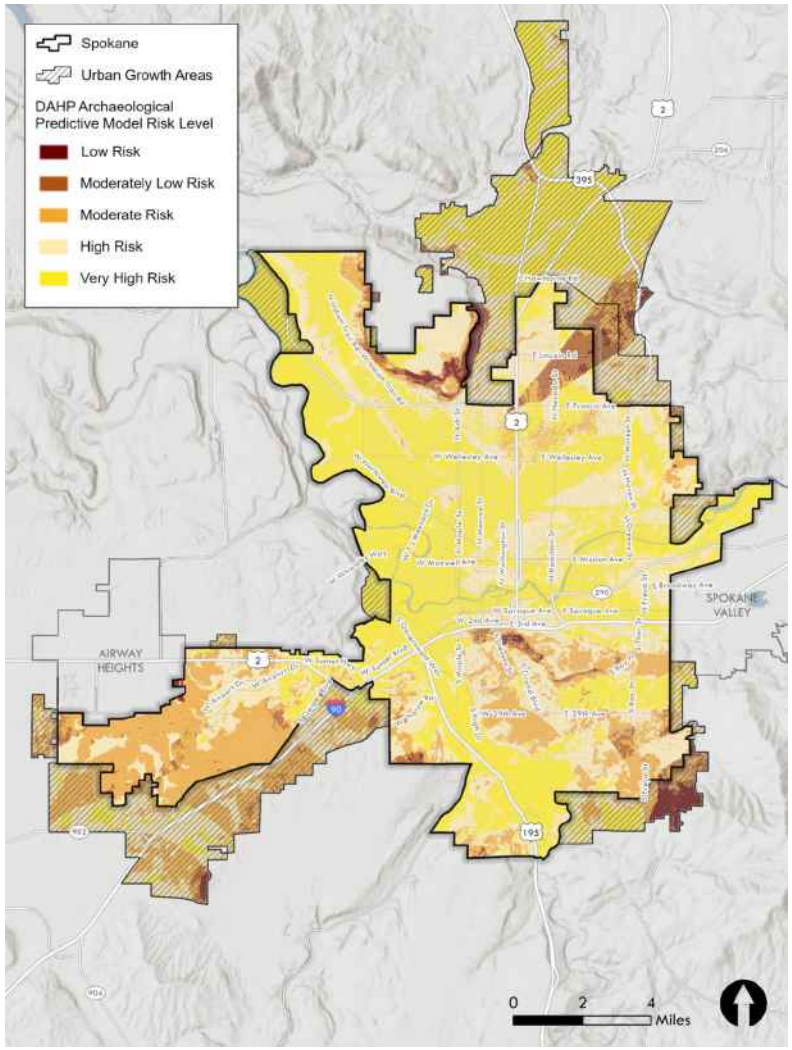
Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:40:20 PM
to large historic homes and apartments on a typical grid street pattern.

Page: 220

Comment # 9

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 12:07:00 PM
This map shows how the proposed decision tree would result in a lot of survey required depending on the threshold to initiate the tree.

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.

Page: 221

Comment # 9

Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:45:25 PM
My guess is that this is actually referring to the Browne's Addition National Register Historic District Nomination from 1976 (https://properties.historicspokane.org/_pdf/districts/national/district-national-18.pdf)

Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:51:29 PM
and over 1000 more properties included in local historic districts.

Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:50:22 PM
e's

Author: mduvall Subject: Comment on Text Date: 1/29/2026 3:48:58 PM
We have added the Cannon Hill Park Local Historic District - in effect on 12/25/2025. We don't have the acres handy, but can get that info to you. Not on the National Register, South for area.

Author: mduvall Subject: Sticky Note Date: 1/29/2026 3:49:58 PM
We could pretty easily give you the number of properties for these rather than the acreage...but maybe there is a good reason for using acreage.

Page: 222

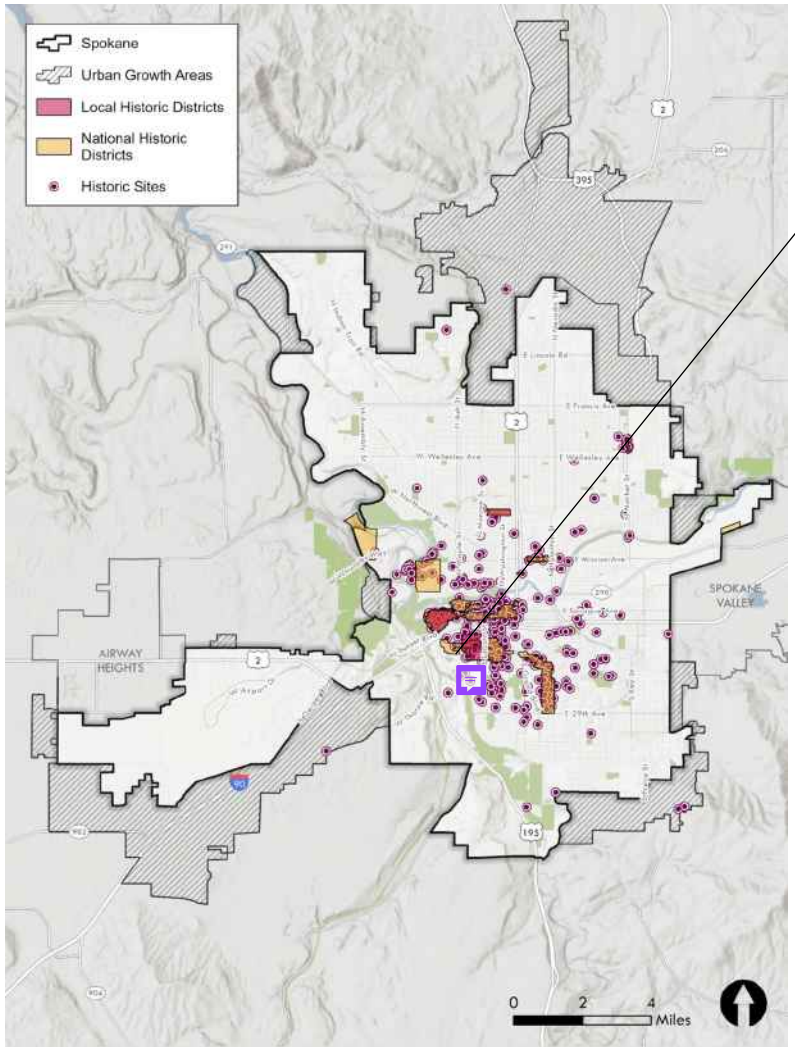
Comment # 9

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 10:57:01 AM
I know a pain, but not sure if you want to update these maps to include the newest local historic district. It should be added to GIS before end of January.

Author: mduvall Subject: Sticky Note Date: 1/29/2026 3:52:14 PM
Will want to add the newest Historic District.

J

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



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

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.

Comment # 9

Page: 236

Author: mduvall Subject: Comment on Text Date: 1/29/2026 4:01:24 PM
and areas around the Spokane River

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 10:58:24 AM
adversely affect

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

Page: 239

Comment # 9

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 11:11:19 AM
Why is this related to CR?

Author: mduvall Subject: Comment on Text Date: 1/29/2026 4:11:57 PM
We have protections against demolition in local historic districts like Hillyard.

Author: mduvall Subject: Comment on Text Date: 1/29/2026 4:14:39 PM
We need ADDITIONAL incentives if we want to keep historic buildings in use.

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 11:13:38 AM
I guess I am still a little unsure of this reasoning.

Author: mduvall Subject: Sticky Note Date: 1/29/2026 4:13:18 PM
I agree - just because you can develop in the areas called out in Alternative 3 doesn't mean no one will want to build in lower density areas.

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.

Comment # 9

Page: 241

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 11:22:03 AM
We just did one of these and we caught it in pre-dev. I am glad we caught it, but I am a bit nervous of a non-mandatory process being the best way to catch one of these with even more SEPA exemption. M

Author: mduvall Subject: Comment on Text Date: 1/29/2026 4:27:09 PM
we don't have these - it was put in our code, but never was done. Honestly, we don't have utility incentives either. We have facade improvement grants, code relief and property tax reduction incentives. M

Page: 242

Comment # 9

Author: mduvall Subject: Comment on Text Date: 1/29/2026 4:31:06 PM
Since Cultural Resources are the most adversely impacted in all alternatives - it seems that proactive mitigation like a City-wide historic preservation plan should be considered. It would be useful for future development as well as a tool for developers to use to avoid major impacts to highly concentrated areas of historic resouces.

N

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 11:55:33 AM
Our office is unclear on what threshold will trigger the decision tree: all projects, projects of certain size, grading?

N

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:

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.

Page: 245

Comment # 9

Author: mduvall Subject: Comment on Text Date: 1/29/2026 4:35:25 PM
This is beyond just inadvertent discoveries. A city-wide historic preservation plan would be an important tool for us and planning.

N

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

Comment # 9

Page: 300

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 11:31:18 AM
HP loves this.

Author: mduvall Subject: Sticky Note Date: 1/29/2026 4:35:49 PM
Hear, hear!

Author: mduvall Subject: Sticky Note Date: 1/29/2026 4:36:49 PM
Although, I'm not sure what "preservation credits" are? Tax credits?

O

Page: 330

Comment # 9

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 11:33:10 AM
adversely affect

P

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**.

- *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.

Page: 599

Comment # 9

Author: lcamporeale Subject: Comment on Text Date: 1/6/2026 11:40:54 AM
I wish this included language about increased survey work so we can be proactive not reactive in identification of resources.

Author: mduvall Subject: Sticky Note Date: 1/29/2026 4:40:27 PM
Exactly. Mitigation for this adverse impact should be city-wide survey work so that we can use "available data".

Q

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.

Comment # 9

Page: 606

Author: mduvall Subject: Comment on Text Date: 1/29/2026 4:42:43 PM
I don't know if this section should include the Preservation of Salvageable Materials ordinance (15.06) since it requires any building that is eligible for listing on the Spokane Register to be deconstructed for important historic material preservation before demolition may occur? Or maybe it is better located with the environmental section?

R

From: Picanco, Kevin
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments - Request for Comment Period Extension
Date: Wednesday, February 18, 2026 3:05:52 PM

Tirrell-

The City's Integrated Capital Management department requests a 9-day time extension to Friday, February 27th to provide comments on the Draft EIS and Notice of SEPA Infill Exemption and Raising of Minor New Construction Thresholds. A

Please confirm receipt and time extension approval.

Thanks,

Kevin Picanco, P.E. | Interim Director
City of Spokane | Integrated Capital Management
509-625-6088 | kpicanco@spokanecity.org | spokanecity.org

From: Picanco, Kevin
To: Plan Spokane
Cc: Black, Tirrell
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, March 5, 2026 12:55:48 PM
Attachments: Draft EIS - ICM Comments 030526.docx

Please see attached comments from ICM.

Thanks,



Kevin Picanco, P.E. | Director – Integrated Capital Management
City of Spokane | 509-625-6088 | kpicanco@spokanecity.org

Comment # 11

Date: 3/4/2026
To: Tirrell Black, Assistant Planning Director
From: Integrated Capital Management
CC: ICM file
Subject: PlanSpokane 2046 Draft EIS and Infill Exemption Comments
Attachments: Exhibit 7, DEIS

SUMMARY:
This document provides utility and transportation comments on the proposed Exemptions to Promote Infill Development and Housing. In the Programmatic Draft Environmental Impact Statement (DEIS) issued December 18, 2025, conducted in conjunction with the City's mandated periodic update to the Comprehensive Plan to be completed by December 31, 2026, the City has examined both raising the Categorical Exemptions to SEPA Citywide, as well as a more targeted Infill Exemption.

ICM is supportive of changes to the Categorical Exemption levels subject to code revision recommendations and future considerations, studies or analysis detailed below.

ICM is supportive of the Phase 1 Infill Exemptions Area moving forward but has concerns with the proposal for Phase 2 area at this time. Many of these concerns can be addressed in the city's planned development code update beginning in Q2 2026. ICM looks forward to participating in that process. A

Categorical Exemptions - Initial Recommendations:
If there is desire to streamline development within the Phase 2 area ICM staff would be supportive of increasing the following thresholds allowed by WAC 197-11-800. B

- Up to 30 SF units, including those under 1500 square feet. There is no difference in trip generation with smaller SF homes in areas with no alternatives to driving.
- Up to 50 MF units. This would be consistent with the 30 SF units as they generate a similar number of PM peak trips. Also, significant water amenities such as pools or water parks should not be included within the exemption. The selected maximum flow rate exemption should be decided by the City's Wastewater and Water Engineers.
- Up to 30k for office, commercial, service and storage. This size of commercial building water and sewer demands can range greatly but are typically within the range of 50 MF Units wastewater and water utility demands. Exception should be made for commercial buildings with high water and sewer demand facilities. Examples include breweries, carwashes, marijuana growing or processing facilities, pharmaceutical facilities or data centers. The selected maximum flow rate exemption should be decided by the City's Wastewater and Water Engineers.
- Up to 90 for parking stalls
- Up to 1000 cubic yards for grading

Comment # 11

Infill Exemption, Phase 2 area recommendations, focusing on future Unified Development Code changes:

Note: Infrastructure capacity needs and challenges vary by location; ICM Staff would be supportive of evaluating individual TAZs or a group of TAZ's (within the Phase 2 boundary) as potential add-ons to the Phase 1 areas subject to considerations noted in sections below. C

In order to consider the additional SEPA exemption Phase 2 area, additional consultation with ICM, Water, Wastewater and Street Departments is required and additional capacity analysis may be warranted. Necessary code modifications, City Actions and Additional Considerations and Limitations that should be addressed prior to expansion of the SEPA exemptions for Phase 2 areas are summarized below. D

Modifications to the Spokane Municipal Code requiring developers to do the following: E

- Offsite sidewalk and roadway improvements under certain conditions to access transit, schools, bus stops, parks and commercial sites.
- Offsite crosswalk enhancements (signing, striping, illumination, refuge islands, RRFBs, etc.) when the development will cause an increase in pedestrian need to cross arterials.
- Code requirement for traffic signals for locations not covered by concurrency, such as an entrance to a large shopping center or apartment complex.
- Other traffic safety improvements when the need is identified through a traffic impact analysis, including but not limited to traffic calming devices, sight distance mitigations, installation of curbing to restrict access, relocation or consolidation of driveways, dedication of right-of-way, modifications to signal phasing, and construction of turn pockets.

Infill Exemption, Phase 2 Area, City Actions which are needed prior to adopting Infill Exemption in the Phase 2 area: F

- Analysis of the proposed use and density for the Phase 2 area using the SRTC Model, along with identification of transportation and wet utility mitigation(s) to address the environmental impact, per the requirements of RCW 43.21C.229(2) or (3).
- Adoption of additional transportation long-term funding source(s) such as a Tax Increment Financing District, Local Improvement District or similar program to provide match for the Transportation Impact Fee Program. For utilities, a funding source could be a ULID (Utility Local Improvement District) or other mechanism.
- An update to the City's Design Standards and modifications to the Spokane Municipal Code for all wet utilities.
- Development of a funding plan including a commitment from state sources to support projects parallel to US 2 and US 195.
- Development of a funding plan or approach for upsizing requirements for major wet utility facilities including interceptor mains, transmission mains, storages, siphons, lift stations or booster stations, etc.

Comment # 11

Additional Conditions and Limitations

Examples of additional conditions and potential limitations that should be considered in evaluating expansion of Phase 2 SEPA exemptions include but are not limited to:

Transportation:

- Availability of transit service within ½ mile.
- Construction of alternative and parallel routes to State highways to provide connectivity.

G

Stormwater:

- Identify locations within special stormwater or drainage districts such as Moran Prairie or Five Mile Prairie or areas of challenging treatment and drainage options such as the West Plains.

H

Wastewater:

- Identify locations that will be contributing to regional lift station(s).
- Consideration goals, status and progress of objectives of the Septic Elimination Program.

I

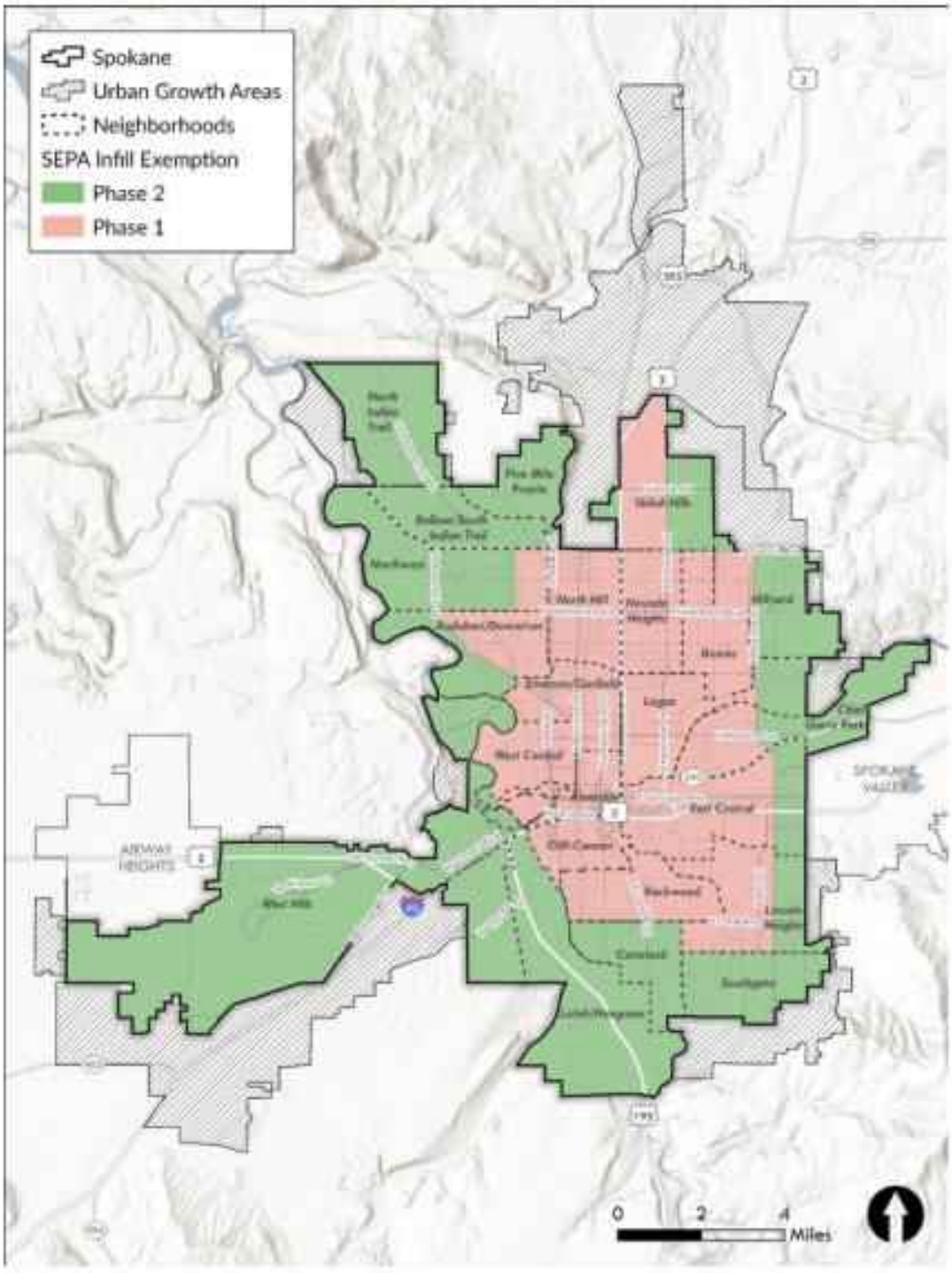
Water:

- Consideration of additional infrastructure demands created by water contamination.
- Capacity challenges related to future intertie agreements.

J

Comment # 11

Exhibit 7: Phased SEPA Proposed Infill /Categorical Exemption Area



Source: City of Spokane, BERK, 2025.

From: Luke Tolley
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 24, 2026 9:10:08 PM
Attachments: CA Agenda Packet- February 5 2026 Land Use.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello,

At our February 5th Community Assembly meeting, the Assembly approved the recommendation from our Land Use Committee to forward these comments and questions in regard to the PlanSpokane 2046 Draft EIS Comments.

I have also attached a more in depth analysis that the committee created.

Comments/Questions

1. The draft EIS uses the neighborhood council boundaries but gives no role or voice to the councils or the Community Assembly, although these are the city's constituted bodies for residents' expression regarding governance issues. It does mention reliance on Neighborhood Action Plans, but many of those are either outdated and in some cases are non-existent. A

2. Both the Plan Commission and various community members have concerns regarding both Alternatives 2 and 3. What is the mechanism for modifying these alternatives and coming to consensus on a single, final map? B

3. When looking at Alternatives 2 and 3, it is important to consider the number and types of additional housing units that are required in the next 20 years. Several 2025 studies, including the Land Capacity Analysis and Accommodating Affordable Housing, point to the fact that the city already has sufficient or surplus housing for all income types except 0-80% AMI. In that category, Spokane has a 4,400-unit shortage. In 80-120% AMI, there is a 6,000-unit excess. In 120% AMI there is a 9,000- unit excess. The only housing needed until 2046 is in the lower income categories. How might this fact affect land use, permitting, demolition, incentives, etc.? The EIS seems to be written with the idea that building by private individuals will continue unabated whether need has been established. It seems that the idea is that city residents must accept all additional construction with the idea that some of the housing will accrue to residents in the 0-80% AMI category. However, no mechanisms to accomplish this are proposed in the draft EIS or elsewhere. C

4. The role of demolition of housing stock is a key issue in both alternatives but is not mentioned early in the draft statement. Demolition of current stock comes with many issues, including the potential displacement of those with lower incomes, the reduction of home ownership in favor of renting, and the disruption of neighborhoods especially those near corridors with empty lots on which owners do not wish to build housing. However, as currently written the document suggests that none of these issues is a problem. The city seems to be relying on action alternatives that would address affordability in the marketplace, and the City’s new policies and codes addressing anti-displacement measures. There is no proof that such will take place or be effective. D

5. The projected impact of the contemplated exemptions is extensive. For instance, Exh. 6 p. 612 shows how an infill exemption extending the ‘corridor’ definition to one-half mile on each side of the corridor would affect some neighborhoods negatively. The ‘Exemption’ document (originally separate but now the final appendix of the EIS) even calls for the entire city to be designated a ‘corridor’. E

6. Given that the draft envisions that no alternative will result in the increased use of transit and only a tiny increase in use of active transportation, is the City doing enough to reduce the use of personal vehicles that is the source of a large proportion of pollutants? Where will the increased number of vehicles correlated to the increased population be parked? F

7. The section labelled “Earth, Water Quality, and Water Resources” does not contain a single reference to the aquifer that is vital to our region. Why? How will the Plan, in this section and elsewhere, address the current numerous and profound attempts to reduce and eliminate environmental considerations, incentives, and regulations at the federal level? G

8. Since there is provision for course correction during the 20-year period, it is essential that we use today as a starting point, when considering population, current housing stock, family size, the state of the environment, home ownership, displacement, etc. The statement should seek to lessen environmental impacts, while improving home ownership and minimizing displacement. H

Summary: In sum, the effect of infill exemptions and Plans 2 and 3 will open neighborhoods to exploitive and somewhat unregulated development where retail, restaurants and apartment buildings are placed in the midst of single-family home communities, often with no parking requirements and no room for trees. Many resident commentators on the draft comprehensive plan indicate that there is no need for an either/or approach to these options. Rather the city might adopt the best from each of them to achieve the goals of protecting neighborhoods, increasing environmental integrity and reaching environmental goals (such as air quality through the protection of trees) and provision of affordable housing. But clearly, as offered, none of these options are optimal. As written, neither Options 2 or 3 protect neighbors or neighborhoods for the reasons mentioned.In Community, I

Thank you.

Luke Tolley
Community Assembly Administration Committee Chair
he/his
phone: 509.221.9721
Hillyard, Spokane, Washington

Questions and comments on Environmental Impact Statement
Linda L. Carroll, Ph.D.
nominee, Community Assembly Liaison to Plan Commission

The questions and comments in the first section are general ones concerning the Statement and procedures involving it. The second section focuses on specific details.

General Comments and Questions

1. What is the role of Neighborhood Councils and of the Community Assembly, the city's constituted bodies for residents' expression concerning governance issues, in responding to the Environmental Impact Statement and in the choice of the Preferred Alternative by "Community and Decision Makers" (p. 507; Chapter 5 Appendix A, Plan Spokane Community Visioning Engagement Summary, p. 11)? The report utilizes as its basic area units the Neighborhood Council boundaries and relies on Neighborhood Action Plans formulated by the respective Neighborhood Councils. J
2. If current mechanisms (e.g. permitting) are inadequate for ensuring that the Preferred Alternative is followed by the private interests that will be building housing, what provisions will the city make for enacting its tenets? For example, what are the City's options if the owner of a parcel of land on/near a bus rapid transit route prefers to leave it as an empty lot (its current state) rather than build affordable multi-family housing on it? (Councilmember Klitzke's idea concerning taxation for vacant properties addresses the issue.) K
3. Why is the very important role of the demolition of current housing not mentioned until p. 55 of the Environmental Impact Statement? That statement refers vaguely to "over twice as many housing units" demolished under Alts 2 and 3 as compared to Alt 1--the actual numbers are not given until p. 285 (Alt 1 849, Alt 2 1,697, Alt 3 1,698). That section (Residential Displacement, pp. 284-86) provides a more detailed discussion of projected demolitions. It notes the potential that lower-income residents' rate of home ownership will be reduced by the demolition of single-family owned homes in favor of multi-family rental property. And, while note 9 on p. 284 asserts that "development is more likely to occur on vacant lots or those with no existing homes," it is entirely possible instead that owners of vacant properties on corridors will not be interested in constructing affordable multi-family dwellings. That will then increase pressure to demolish single-family homes in the contiguous quarter-mile included in the corridor designation in favor of multi-family dwellings. The Neighborhood Councils and the Community Assembly should evaluate the very extensive conclusion (p. 303) to this section (3.5): "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, L

no significant unavoidable adverse impacts to population, employment, or housing are expected under any alternative." L

4. Although the consideration of future exemptions to the thresholds is located at the very end of the file because it was originally a separate document (Appendix E, pp. 594-614 and especially pp. 609-14 of pdf), it carries enormous implications for the Environmental Impact Statement. The projected impact of the contemplated exemptions is extensive. Exh. 6 p. 612 shows how an infill exemption extending the 'corridor' definition to one-half mile on each side of the corridor would affect a number of neighborhoods; for example, all of Emerson-Garfield would become a corridor. Exh. 7 p. 614 shows that if extended to Phase 2, the "SEPA Proposed Infill / Categorical Exemption Area" would include the entire city. M
5. Given that the Environmental Impact Statement envisions that the three alternatives will result in no increased use of transit and only a tiny increase in use of active transportation (Chapter 3, section 7, esp. pp. 386, 390, 393, 399), is the City doing enough to reduce the use of personal vehicles that is the source of a large proportion of many pollutants? See pp. 164-65 for some additional possible measures. N
6. Given that this is an Environmental Impact Statement, more of the information concerning "Environment, Impacts, and Mitigation Measures" (Section 3, beginning on p. 114 of the pdf) should be included in the preceding two sections (Section 1 "Summary"; Section 2 "Proposal and Alternatives"), which give almost all of their space to issues of housing, jobs, and transportation. For example, Section 1.4.1 "Earth, Water Quality, and Water Resources" does not contain a single reference to the aquifer that is vital to our region. O P
7. How will the Plan be affected by the current numerous and profound attempts to reduce and eliminate environmental considerations, incentives, and regulations at the federal level? Q
8. The narrative, much of which is written in general terms, would benefit from examples of the concrete details given in the exhibits. R
9. Citizen comments from outreach sessions included in an Appendix showed a wide preference for combining features of Alternative 2 and Alternative 3 rather than choosing one of the three Alternatives presented. What plans are there for making one or more combined models? S
10. What opportunities will there be over the twenty years of the alternative's duration for course correction of any problems that may develop? T

Comments on specifics (page numbers refer to the union pdf; in some cases, numbers referring to the section of the report are also given). U

pp. 88-89 (2.16-17) The authors of the Environmental Impact Statement concerning population stipulate a growth range of 25,157-50,650 (4,000-29,000 greater than the state assumption) based on the assumption that the current household size of 2.33 will continue through 2046. On what research do the authors base their assumption? In the next section, they set forth the statistics on household size by dwelling type, which establishes that the dwelling types that the Environmental Impact Statement proposes to increase correlate with **smaller** households. The assumption that household size will remain the same calls for more **single-family** dwellings.

pp. 89-90 (2.17-18) According to the authors, “it is assumed” that allowing more multi-family housing in certain designated areas means that “over 5,400 attached multiunits could be expected.” What happens if current owners do not want to construct those kinds of housing and do not want to sell to someone who does? V

p. 92 (2.20) What land use and development regulations need to be modernized and in what way? Specifics are needed.
p. 93 (2.21) In what ways will the anticipated “unified development code and GIS-based zoning map” be “enforceable”?
p. 93 (2.21) need for examples or specifics of strategies to “simplify and expedite development review and permitting processes while ensuring predictable outcomes and consistent application.” If they occur later in the report, a cross reference is needed.
p. 93 (2.21) “Engage Stakeholders and the Public” What is the role of Community Assembly and Neighborhood Councils, the city's constituted bodies for residents' expression concerning governance issues, especially in the anticipated “Preferred Alternative Selection” by “Community and Decision Makers” (p. 507; Chapter 5 Appendix A, Plan Spokane Community Visioning Engagement Summary, p. 11)? U

pp. 114-464 Chapter 3 This is the Environmental Impact Statement proper.
p. 138 more jobs=greater [negative] impact on environment
pp. 145ff 3.2 Air Quality and Greenhouse Gas Emissions
p. 150 from 2016 to 2025, increased population and increased consumption of fossil fuels and refrigerants resulted in increased emissions
p. 155 expansion of road system, such as North Spokane Corridor, will result in higher levels of pollution
p. 157 The report cites three sources for assessing and visualizing pollutant levels in Spokane but does not provide, here or elsewhere, URLs or other means of locating them.
pp. 158-59 in all three scenarios, the large amount of pollutants emitted by energy consumption and vehicles will create air quality issues and burdens throughout the city and especially for those parts which are already suffering because of their proximity to sources of pollution, such as Hillyard, Lincoln Heights, and Chief Garry Park. W

p. 160 Given the termination of the federal EV purchase credit, it is unlikely that great reductions of emissions from vehicles will be achieved. If the current mix of internal combustion-EV vehicles remains unchanged, emissions will increase by about 40% by 2046 for all three Alternatives (535,500 to 714,036 Alt 2 or 737,853 Alt 3).
p. 161 and below, esp. 166 Given the termination of clean-energy projects by the federal government, will the state and city clean-electricity mandates remain in place unchanged?
p. 162 “Alternative 2 results in the lowest energy and transportation emissions across all scenarios.”
p. 166 3.2.4 Can the expectation of “[n]o significant unavoidable adverse impacts on air quality and GHG emissions” be maintained in the face of the cancellation of many clean-air projects and incentives by the federal government? X

p. 172 numerous threats to habitat and water quality, including by the numerous local dams, high sediment levels, loss of riparian forest, high water temperatures, runoff Y

from treatments to vegetation for agriculture and yard purposes, stormwater and wastewater, non-native plants Y

pp. 174-75, 177-80 identification-description of a large priority habitat area that extends around southwest Spokane and areas of the extremely rare and disappearing shrub-steppe habitat vital to certain iconic species in Five Mile Prairie, Hillyard, western portion of West Plains. [We must exert all effort needed to preserve these habitats.]

p. 183 All alternatives predict population growth and therefore increased damage to habitats.

pp. 184-86 Although the conclusions for the three Alternatives are identical ("As a result, **Alternative 1 would result in less than significant impacts to plants and animals**"; "As a result, **Alternative 2 would result in less than significant impacts to plants and animals**."; **"**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**."), a comparison of the three discussions makes it clear that Alternatives 1 and 3 would have greater harmful effects on wildlife habitat than Alternative 2. Z

p. 219 How is 'underutilized' defined with regard to property upon which more housing could be built? U

pp. 221, 223 On p. 221, Corbin Park is listed as both a local and a National Historic District; on p. 223 it is referred to only as a local historic district. Which is correct? AA

p. 225 The "Existing Transportation-Related Noise" map incorrectly omits Division Street (Division-Ruby couplet) from consideration even though it easily produces as much noise as the Maple-Ash couplet. AB

p. 226 The list of areas especially affected by noise pollution omits Northwest Spokane, home of the Great Northwest Spokane Street Speedway (Division, Ruby, Post, Monroe, Maple-Ash, Northwest Blvd; Wellesley, Francis, Indiana, Boone, etc.). Under the current mayoral administration and police chief, the issues it generates are being addressed, but it would be prudent for the City to put lasting measures in place. AB

pp. 232-35 "Land Use Patterns and Compatibility" "Urban Form" important sections for Neighborhood Councils to review U

p. 245 "All the alternatives have the potential for significant adverse impacts to cultural resources in the analysis areas."

p. 258 The table evaluates 29 current city policies with regard to their supportiveness of increased housing but gives no list. Which specific policies are these?

p. 266 Commercial Building Conversion: Is the entire building required to be converted to housing or may a part of it remain commercial?

p. 282-83 Exhibit 3.5-33 Housing Action Plan Strategies Advanced Under Alternatives. This section is an important one for Neighborhood Councils to review, as the strategies will impact the neighborhood and neighborhood residents, especially features such as attention to the impact of the short-term rental market on affordable housing, preserving the viability of existing home ownership for low-income residents.

p. 284 What is the factual basis for the claim 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)"? There is a string of parcels with no housing along Division Street

between Mission and Bridgeport that has remained unbuilt even after the city's recent change in designations and zoning.

p. 291 Why is North Division with its string of empty lots omitted from the list of streets with redevelopable properties in Alternative 1? U

p. 303 The concluding sentence of the following quotation should be evaluated by Neighborhood Councils and the Community Assembly: "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."

pp. 317 ff Neighborhood and Subarea Plans here and following.

pp. 337-41 3.6-9 through 3.6.12 The estimates made by the authors of the report as to the effect of each of the three Alternatives in carrying out the Action Plan of each neighborhood that has one. Narrative explanations of those estimates follow.

p. 347 the Level of Service grades consider vehicle movement only

pp. 359-63 Vehicle Network

pp. 487ff **Chapter 5** Appendices containing the materials used

Appendix A These are the reports from the various outreach sessions and contain a record of comments made by attendees, some of which are excerpted here. AC

p. 503, 506, 510, 514, 518-20, 522-23, 525 "Staff Vision Re-Write B," which includes "cherishing its unique and vibrant neighborhoods," received the most votes (this appears to be a total of the votes at all three district sessions; however, the total number of votes for all three rewrites was only 100) (p. 503). A similar request in the survey resulted in a strong expression of preference for B (p. 506). Survey respondents also added "leveraging existing investment" to desired features of the Plan. Attendees at the District 1 session held at Northeast Community Center supported B (p. 510). Attendees at the District 2 session held at Liberty Park Library supported A, but with C receiving only one less vote (p. 514). Attendees at the District 3 session held at Shadle Park Library supported B (p. 518). They also added "Reuse of history [*sic*, *recte* historic] buildings prior to new development" (p. 519) and "do not let land sit unused/vacant" (p. 520) to the Vision. Attendees at the Community-wide session supported B (p. 522). They added "Focus on [home] ownership to build personal stability and wealth," "How to test the benefits of proposed changes," and "Ensure changes are beneficial to the city at large, not just those heard from" to the Vision (pp. 522-23, 525).

p. 529 "sittable" neighborhoods (places where elderly and disabled may sit); creating (rather than preserving) neighborhood identities; address land speculation (was this incorporated into Plan documents?); Greater civic engagement, involvement, and transparency.

AC

p. 531 Under suggestions for “Residential Low” designation: “Create a process of neighborhood input on a project-by-project basis for non-standard uses”; “Prioritize adaptive reuse over new development”

p. 531 Under suggestions for “Commercial” designation: “Leverage vacant commercial areas to add business or apartments”

p. 533 “Alternative 2 received the most votes with 25. Alternative 3 came in second with 7.” However, many attendees instead of voting commented on combining desirable features of 2 and 3, with the result that “[t]he 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 2, connectedness appealed; in 3 the emphasis on the Center City appealed.

pp. 534, 536 “No mixed-use in neighborhoods, concerned over exploitative development”; “Create protections against displacement in Chief Garry Park around City Line stops” (p. 534); “Recognition of limits to growth” (p. 536)

pp. 540, 541, 544 suggestions from attendees at District 1 “Future Growth and Guiding Policies Community Workshop” (approximately 22 attendees): “More Civic Engagement”; “Incentives for empty properties on Division following BRT implementation”; “Continue partnerships with housing services and neighborhood councils” (p. 540). Alternative 2 preferred (p. 541). “Prioritize policies with city action rather than informational or “encouraging” resident action” (p. 544).

pp. 545, 546, 548, 549, 550 suggestions from attendees at District 2 “Future Growth and Guiding Policies Community Workshop” (approximately 40 attendees): “Don’t use broad terms in Comprehensive Plan”; concern about “corporate rental ownership” and request to “Control rents” (p. 545). “Allow neighborhood input on a project-by-project level for other uses”; “Prioritize historic/adaptive reuse over new development (both commercial and residential)”; though Alternative 2 received the most votes, many did not vote but instead identified desirable and undesirable features of the various alternatives, such as that high density is isolating and large developments should have traffic lights at the exit (p. 546); no mixed use in neighborhoods, protect neighborhood from exploitive development (p. 548); “Enable neighborhoods to create more social capital and be able to take action and help issues”; “Need to have an acknowledgement of growth/our limits” (p. 549); “Recognize limits to growth” (p. 550)

pp. 552, 553, 554 suggestions from attendees at District 2 “Future Growth and Guiding Policies Community Workshop” (approximately 40 attendees): “for elderly and disabled residents, walkable also means sittable”; “sidewalk safety (e.g. electric scooters and conflicts with pedestrians” (p. 552); “Density transition: no high-rise next to single unit homes”; “Vacant lots, parking lots sitting unused” (p. 553). Although Alternative 2 received the largest number of votes, most attendees instead highlighted desirable features of various alternatives: repeated emphasis on development of downtown; preference for preservation of historic buildings, revitalization and reuse; “Like a multi-block approach to intensities (like Alt 3 downtown) over less depth along transit lines” (p. 554)

pp. 559, 561, 563, 564 suggestions from attendees at City-Wide “Future Growth and Guiding Policies Community Workshop” (approximately 35 attendees): “Address land speculation” (p. 559). Although Alternative 2 received the largest number of votes,

most attendees preferred to comment on desirable features of the various alternatives (p. 561). “On Washington, Howard, and Post, flip bike lane and parking”; “Push Monroe Road Diet down to Kendall Yards” (p. 563). Various suggestions to preserve natural green areas, parks, and animal species (pp. 563-64). AC

Appendix E Environmental Review Exemptions to Promote Infill Development and Housing, prepared by BERK Consulting (i.e. the consultant whose field of expertise is housing, not the two consultants whose fields of expertise are aspects of the environment). AD

- p. 594 refers to exemptions from new environmental review of development where “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”: this exemption is based on probability, not on verified facts; new development could result in new environmental impacts
- p. 596 how are “adequately” and “non-significance” defined?
- p. 598 Exhibit 2 gives an outline of the City’s current choice of intermediary amounts of residential units, commercial units, and excavation/landfill but then states “The City could adopt higher thresholds, which could vary by use or different geographic areas, and mixed-use projects.” See pp. 610ff Potential Infill Exemption Location for areas where there is the greatest reason for the City to adopt higher thresholds.
- pp. 610ff Potential Infill Exemption Location. It is clear from Exhibits 4, 5, 6, and 7 in this section that the areas of the city that will most likely be considered for the first exemptions are located in neighborhoods developed in the early 20th century and that are currently residential with predominantly single-family housing. Exh. 7 makes it clear that if the city moves to Phase 2, the entire city will be included in the “SEPA Proposed Infill / Categorical Exemption Area.”

From: GTNC Execs
To: Plan Spokane
Subject: EIS & Land Use Comments from Grandview-Thorpe Neighborhood Council
Date: Tuesday, February 17, 2026 9:11:09 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Plan Commission and Council Members,

On behalf of the Grandview/Thorpe Neighborhood Council, we submit the following comments regarding the Draft Environmental Impact Statement (EIS) and the proposed land use Alternatives 2 and 3.

We recognize the considerable effort invested in preparing the Draft EIS. However, given its length and complexity, it is essential that the City carefully consider the significant concerns raised by neighborhood representatives and community members.

1. Role of Neighborhood Councils and Community Assembly

The Draft EIS references neighborhood council boundaries but does not meaningfully incorporate neighborhood councils or the Community Assembly into the decision-making framework. These bodies are the City's formally constituted mechanisms for resident engagement on governance and land use matters. A

While Neighborhood Action Plans are mentioned, many are outdated or nonexistent. We respectfully request clarification regarding how neighborhood councils will be engaged in shaping, refining, and implementing any final land use map or alternative.

2. Mechanism for Modifying Alternatives and Reaching Consensus

Both the Plan Commission and members of the public have raised concerns about Alternatives 2 and 3. We request a clear explanation of the mechanism by which these alternatives may be modified, combined, or refined into a single, consensus-based final plan. B

The community deserves a transparent process that allows for thoughtful adjustment rather than a binary choice between two imperfect options.

3. Housing Need and Affordability Data

Recent 2025 studies, including the Land Capacity Analysis and Accommodating Affordable Housing reports, indicate that Spokane's housing deficit is concentrated in the 0–80% AMI category, with an estimated shortage of 4,400 units. At the same time, the City shows a surplus of approximately 6,000 units in the 80–120% AMI range and 9,000 units above 120% AMI.

Given this data, the central housing need through 2046 is affordable housing in the lower-income categories. Yet the Draft EIS appears to assume that increased private development across all income levels will inherently resolve affordability gaps. No concrete mechanisms are identified to ensure that new development will meaningfully address the 0–80% AMI shortage. C

We request clarification on how land use policy, demolition approvals, permitting, and incentives will be aligned specifically with documented affordability needs rather than generalized growth assumptions. C

4. Demolition, Displacement, and Neighborhood Stability

Demolition of existing housing stock is a significant issue embedded within both Alternatives 2 and 3 but is not adequately addressed early or comprehensively in the Draft EIS.

Demolition can result in:

- Displacement of lower-income residents
- Reduction of homeownership opportunities
- Increased reliance on rental housing
- Disruption of established neighborhoods

The Draft EIS appears to assume that future anti-displacement policies and affordability measures will sufficiently mitigate these impacts. However, no evidence is provided that such measures are in place or will be effective.

We urge the City to explicitly address demolition impacts, displacement risk, and homeownership preservation in both analysis and policy recommendations. D

5. Scope and Impact of Proposed Exemptions

The contemplated infill exemptions—particularly the expansion of "corridor" designations to one-half mile on each side and the suggestion that the entire city could qualify as a corridor—would dramatically alter neighborhood character across Spokane.

Such broad exemptions risk facilitating intensive, uncoordinated development within established single-family neighborhoods without adequate parking, tree preservation, or infrastructure considerations. The cumulative impact of these exemptions must be fully disclosed and carefully reconsidered. E

6. Transportation, Parking, and Environmental Impacts

The Draft EIS indicates that neither alternative is expected to significantly increase transit use, with only minimal increases in active transportation. If population increases are anticipated without corresponding transit gains, personal vehicle use will likely rise.

We ask: F

- How will additional vehicle demand be accommodated?
- Where will parking occur in areas with reduced requirements?
- What strategies are in place to meaningfully reduce vehicle-related emissions?

Additionally, the “Earth, Water Quality, and Water Resources” section omits reference to the region’s critical aquifer system. Given its importance to public health and environmental sustainability, this omission is concerning and warrants correction. G

7. Need for Adaptive Planning Based on Current Conditions

While the plan contemplates course correction over a 20-year period, it is vital that today’s realities serve as the baseline. Current population trends, housing stock conditions, family size, environmental health, displacement risks, and homeownership levels must guide responsible planning.

The overarching goals should include: H

- Minimizing displacement
- Strengthening homeownership opportunities
- Protecting neighborhood character
- Preserving trees and environmental integrity
- Directing growth toward demonstrable affordability needs

Conclusion

As currently presented, Alternatives 2 and 3—combined with expansive infill exemptions—risk opening neighborhoods to unregulated or exploitative development patterns that may undermine community stability, environmental goals, and affordability objectives. I

We do not believe this must be an either/or decision. A more thoughtful approach would integrate the strongest elements of each alternative while prioritizing environmental stewardship, neighborhood protection, and targeted affordable housing production.

The Grandview/Thorpe Neighborhood Council respectfully requests meaningful revisions to the Draft EIS and a transparent collaborative process moving forward. Our community stands ready to engage constructively in shaping a plan that meets Spokane’s housing needs while preserving the integrity and livability of our neighborhoods.

Thank you for your consideration.

Sincerely,

Grandview/Thorpe Neighborhood Council
Spokane, Washington

Grandview-Thorpe Neighborhood Council

From: Dan
To: Plan Spokane
Subject: North Indian Trail Neighborhood"s Draft EIS Comments
Date: Wednesday, February 11, 2026 9:09:49 PM
Attachments: North Indian Trail Neighborhood EIS Comments.docx

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

Tirrell Black,

Please see the attached letter with comments on the Draft EIS from the North Indian Trail Neighborhood Council that was put together using comments from our neighborhood's residents and approved to be sent by the residents attending the city neighborhood meetings. Please let me know if there are any questions or additional information I should pass on at our next neighborhood meeting.

Thank you,
Dan Knechtel
North Indian Trail Spokane Community Assembly Representative

To City Of Spokane/Plan Spokane 2046 EIS staff:

After presenting to our neighborhood the 2046 Draft Environmental Impact Statement, with the proposed growth plan alternatives, the North Indian Trail Neighborhood council received feedback with the following significant concerns/comments:

1) Both alternative growth plans propose the North Indian Trail Neighborhood to become a high-density growth hub or corridor. However, the infrastructure is already strained and cannot support additional high-density growth. The main road, North Indian Trail, is constrained on width growth due to geologic and geographic location, the old city dump on the west side and lined with homes that have direct driveways on the road. There is limited access to and from the neighborhood making it an evacuation hazard in a high wildfire risk area. There are still burn scars just north of our neighborhood along the little Spokane river from previous wildfires. The street Francis leading to North Indian Trail Road is a state highway and already has congestion and safety issues that cannot be easily addressed by the city jurisdiction of Spokane. There is no middle school, nor high school in our neighborhood that would be able to support high density growth. A B

2) There is no joint growth plan for North Indian Trail Neighborhood between the City of Spokane and Spokane County. The neighborhood is a peninsula within City limits surrounded by Spokane County. There has already been rapid development on Spokane County land just outside the city limits along our boundaries that has significantly impacted our neighborhood with city water rights, washouts onto city property/electrical lines, fire station usage, road congestion and deterioration due to lack of county access to the properties and residents being in the Mead School district. Before any increased development occurs, there needs to be a joint development plan between Spokane County and the City of Spokane for this Northwest area. C

3) North Indian Trail is not a significant employment center, most of the population commutes to other locations downtown or beyond. It is mostly a suburban single family home residential area with geographic constraints that are not conducive to development as a significant employment center or hub for large businesses in the future. D

We encourage efforts to keep the area low density and low growth, high density growth should be focused along Division and US 395 areas. We recommend the City and County work together to develop a joint comprehensive plan/shared agreement prior to any further development for City land in the North Indian Trail neighborhood and County land Eastward in 5-Mile Prairie, North to the Little Spokane River and Northwest to the Spokane River. E

Thank you for your time and consideration,

The North Indian Trail Neighborhood

From: Janet Farness
To: Plan Spokane
Cc: John Wallingford
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, February 12, 2026 9:08:07 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Climate Resilience and Sustainability Board,

The **350Spokane Interfaith Committee**, in support of **Friends of Spokane Trees (FOST)**, requests that you PAUSE endorsement and passage of the Comprehensive Plan. Of particular concern are options 2 and 3 and the associated concerns that if they pass our neighborhoods will be substantially harmed even more, and more trees will continue to be cut putting contributions of trees to the overall health of our environment in great peril. A

Although there are laudable elements of the new plan it makes sense to PAUSE its passage until the defects might be addressed while maintaining the elements that are most likely to benefit the environment, neighborhoods and the city at large.

Thank you for accepting these comments and considering them in your deliberations.

Janet Farness
on behalf of 350Spokane Interfaith Committee

From: Emilie Cameron
To: Plan Spokane
Cc: Beck, Amanda
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, March 5, 2026 4:34:10 PM
Attachments: image001.png
Comments-EIS Plan Spokane.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Good Afternoon,

On behalf of the Downtown Spokane Partnership (DSP), thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (EIS) prepared as part of the City's comprehensive plan update. We appreciate the thoughtful work undertaken to evaluate Spokane's potential growth patterns and the long-term impacts of land use decisions over the next twenty years.

The decisions made through PlanSpokane will shape the city's economic competitiveness, housing supply, environmental sustainability, and urban vitality for decades. As the steward organization for downtown Spokane, the region's primary employment center, cultural destination, and economic hub, the DSP strongly encourages the city to adopt a preferred alternative that prioritizes infill development, concentrated growth in the urban core, and significant expansion of market-rate housing downtown. A

Downtown Spokane as the Region's Economic Engine

Downtown Spokane functions as the Spokane region's hub for employment, culture, education, healthcare, and tourism. As the center for arts, dining, higher education, and major employers that draw workers and visitors from across Eastern Washington and North Idaho, downtown is critical to both Spokane's identity and its broader economic performance. Concentrating housing and jobs in the city center: B

- Maximizes existing infrastructure and transit investments
- Supports small businesses and retail recovery
- Reduces environmental impacts by limiting sprawl C
- Strengthens Spokane's competitiveness in attracting talent and innovation

To achieve these outcomes, Spokane must focus intentional growth in the urban core. For these reasons, the DSP strongly supports Alternative 3: Center City and Regional Hubs as the preferred growth strategy. D

Support for Alternative 3: Center City & Regional Hubs

Alternative 3 focuses housing and job growth in downtown and other employment hubs while connecting these areas through transportation and infrastructure investments. Compared to a distributed growth pattern, concentrating development in key centers will strengthen downtown's role as the region's economic and employment hub while also encouraging higher-density housing near jobs and services, support walkable mixed-use districts, and reduce infrastructure costs and E

environmental impacts associated with sprawl. Alternative 3 also aligns with Spokane's long-standing centers-and-corridors growth strategy, which emphasizes compact development and mixed-use neighborhoods around activity centers. F

The Critical Need for Downtown Housing

The most urgent priority for Spokane's long-term growth is substantial expansion of market-rate housing downtown. Downtown Spokane currently faces an imbalance between employment activity and residential population. Increasing the number of residents in the urban core is essential to activate streets and public spaces, support local retail and restaurants, increase safety through activity and presence, and strengthen the downtown tax base. Housing is a critical component of creating a vibrant, 18-hour neighborhood. G

The 2025 Downtown Housing Study demonstrates that Spokane has strong potential demand for additional housing in the urban core, noting specifically the need for at least 3,200 market-rate units appealing to young professionals, empty nesters, and remote workers seeking walkable urban living. However, the study also identified structural barriers – including development costs, regulatory complexity, and infrastructure needs – that currently limit new housing construction. PlanSpokane should therefore adopt policies and implementation strategies that actively prioritize housing growth in the downtown core.

Land Use and Regulatory Policies to Enable Growth

To support downtown housing and economic development, the Comprehensive Plan update should incorporate several key policy directions.

1. Prioritize streamlining for development and regulatory certainty to accelerate housing production, including:
- Expanded SEPA infill exemptions and increased thresholds for minor new construction to reduce duplicative environmental review
- Predictable and expedited permitting processes for downtown projects
- Development code modernization to simplify regulations and align them with growth goals

H

2. Implement policies that specifically encourage downtown housing, including:
- Expanding the 8-year MFTE program to 12 years for residential projects in the urban core
- Incentives for adaptive reuse of underutilized office buildings, including tax deferrals and reinstitution of the commercial rate stabilization for utilities
- Strategic use of tax increment financing or public infrastructure investments

I

3. Be competitive in attracting major employers, particularly in emerging sectors such as technology, health sciences, and life sciences, including:
- Encouraging innovation districts and job clusters around major institutions and campuses
- Flexible mixed-use zoning that allows employment, housing, and services to coexist
- Incentives for development near higher-education and medical facilities
- Concentrating housing near job centers reduces commute times and strengthens Spokane's

J

ability to attract skilled workers

Infrastructure and Public Investment

Growth in the urban core must be supported by strategic public investments. The DSP encourages the city to prioritize transportation improvements connecting downtown to regional employment hubs. Utility and infrastructure capacity upgrades will also be needed to support higher-density housing with streetscape and public realm improvements that make downtown neighborhoods more livable and walkable. Meanwhile, investments in parks, public safety, and public services that support a growing residential population that, when coordinated with private development, create the conditions for sustained economic growth.

K

Spokane is entering a pivotal moment. The next twenty years will determine whether the city grows outward or grows stronger. A dispersed growth pattern would require significant expansion of infrastructure and services while reducing the economic and environmental benefits of compact development. Concentrating growth in the urban core and regional hubs allows Spokane to use existing infrastructure more efficiently, protect surrounding natural areas and open space, reduce vehicle miles traveled and greenhouse gas emissions, and support transit and active transportation.

By focusing growth in the urban core, Spokane can build a more vibrant, sustainable, and economically competitive city. Infill development and downtown housing are therefore not only economic priorities—they are essential components of a sustainable growth strategy. Alternative 3: Center City and Regional Hubs is a preferred alternative that ensures a thriving downtown that will benefit the entire region.

We appreciate the opportunity to provide these comments and look forward to continued collaboration as PlanSpokane moves forward.

Sincerely,
Emilie Cameron

30 Years
Emilie Cameron
president & ceo
509.456.0580 ex 103
downtownspokane.org
@DowntownSpokane
DOWNTOWN SPOKANE PARTNERSHIP

DOWNTOWN SPOKANE
PARTNERSHIP

March 5, 2026

City of Spokane Planning & Development Services
Tirrell Black, Assistant Planning Director
City of Spokane
808 W Spokane Falls Blvd.
Spokane, WA 99201

Re: PlanSpokane 2046 Draft EIS Comments

Dear Tirrell,

On behalf of the Downtown Spokane Partnership (DSP), thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (EIS) prepared as part of the City's comprehensive plan update. We appreciate the thoughtful work undertaken to evaluate Spokane's potential growth patterns and the long-term impacts of land use decisions over the next twenty years.

The decisions made through PlanSpokane will shape the city's economic competitiveness, housing supply, environmental sustainability, and urban vitality for decades. As the steward organization for downtown Spokane, the region's primary employment center, cultural destination, and economic hub, the DSP strongly encourages the city to adopt a preferred alternative that prioritizes infill development, concentrated growth in the urban core, and significant expansion of market-rate housing downtown.

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Downtown Spokane functions as the Spokane region's hub for employment, culture, education, healthcare, and tourism. As the center for arts, dining, higher education, and major employers that draw workers and visitors from across Eastern Washington and North Idaho, downtown is critical to both Spokane's identity and its broader economic performance. Concentrating housing and jobs in the city center:

- Maximizes existing infrastructure and transit investments
- Supports small businesses and retail recovery
- Reduces environmental impacts by limiting sprawl
- Strengthens Spokane's competitiveness in attracting talent and innovation

To achieve these outcomes, Spokane must focus intentional growth in the urban core. For these reasons, the DSP strongly supports Alternative 3: Center City and Regional Hubs as the preferred growth strategy.

Support for Alternative 3: Center City & Regional Hubs
This alternative focuses housing and job growth in downtown and other employment hubs while connecting these areas through transportation and infrastructure investments. Compared to a distributed growth pattern, concentrating development in key centers will strengthen downtown's role as the region's economic and employment hub while also encouraging higher-density housing near jobs and services, support walkable mixed-use districts, and reduce infrastructure costs and environmental impacts associated with sprawl. Alternative 3 also aligns with Spokane's long-standing centers-and-corridors growth strategy, which emphasizes compact development and mixed-use neighborhoods around activity centers.

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The most urgent priority for Spokane's long-term growth is substantial expansion of market-rate housing downtown. Downtown Spokane currently faces an imbalance between employment activity and residential population. Increasing the number of residents in the urban core is essential to activate streets and public spaces, support local retail and restaurants, increase safety through activity and presence, and strengthen the downtown tax base. Housing is a critical component of creating a vibrant, 18-hour neighborhood.

The 2025 Downtown Housing Study demonstrates that Spokane has strong potential demand for additional housing in the urban core, noting specifically the need for at least 3,200 market-rate units appealing to young professionals, empty nesters, and remote workers seeking walkable urban living. However, the study also identified structural barriers – including development costs, regulatory complexity, and infrastructure needs – that currently limit new housing construction. PlanSpokane should therefore adopt policies and implementation strategies that actively prioritize housing growth in the downtown core.

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To support downtown housing and economic development, the Comprehensive Plan update should incorporate several key policy directions.

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3. Be competitive in attracting major employers, particularly in emerging sectors such as technology, health sciences, and life sciences, including:
   - Encouraging innovation districts and job clusters around major institutions and campuses
   - Flexible mixed-use zoning that allows employment, housing, and services to coexist
   - Incentives for development near higher-education and medical facilities

- Concentrating housing near job centers reduces commute times and strengthens Spokane's ability to attract skilled workers

Infrastructure and Public Investment
Growth in the urban core must be supported by strategic public investments. The DSP encourages the city to prioritize transportation improvements connecting downtown to regional employment hubs. Utility and infrastructure capacity upgrades will also be needed to support higher-density housing with streetscape and public realm improvements that make downtown neighborhoods more livable and walkable. Meanwhile, investments in parks, public safety, and public services that support a growing residential population that, when coordinated with private development, create the conditions for sustained economic growth.

Spokane is entering a pivotal moment. The next twenty years will determine whether the city grows outward or grows stronger. A dispersed growth pattern would require significant expansion of infrastructure and services while reducing the economic and environmental benefits of compact development. Concentrating growth in the urban core and regional hubs allows Spokane to use existing infrastructure more efficiently, protect surrounding natural areas and open space, reduce vehicle miles traveled and greenhouse gas emissions, and support transit and active transportation.

By focusing growth in the urban core, Spokane can build a more vibrant, sustainable, and economically competitive city. Infill development and downtown housing are therefore not only economic priorities—they are essential components of a sustainable growth strategy. Alternative 3: Center City and Regional Hubs is a preferred alternative that ensures a thriving downtown that will benefit the entire region.

We appreciate the opportunity to provide these comments and look forward to continued collaboration as PlanSpokane moves forward.

Sincerely,



Emilie Cameron
President & CEO
Downtown Spokane Partnership

From: Mary Stohr
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 2:35:44 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Tirrell Black,
See comments below

February 18, 2026

Dear Spokane City Planning Department and City Leaders:

We are writing as members of the group Friends of Spokane Trees (FOST). We have several serious concerns about the Plan Spokane Draft Environmental Impact Statement, especially Options 2 and 3, as they relate to unrestricted development and the placement of retail establishments in our neighborhoods, the waiving of environmental review for most development projects in the city, and the lack of any meaningful protection of our urban forest, air quality, or water resources.

Several developments in Spokane have resulted in the widespread cutting of mature trees on private property; In fact, that is what spurred the creation of FOST. The newish infill law (2019) leaves no room on 20 foot lots (which used to be a minimum of 50) with small setbacks (3 feet instead of 5) for large trees that are most likely to produce oxygen, sequester carbon, reduce the heat index, provide habitat for creatures and shade for all of us and bring beauty to our neighborhoods. A

The lack of a requirement to provide parking for all of the cars for these new houses is likely to clog our streets, reduce street use (e.g. for walking, biking and skateboarding), increase crime (e.g. those neighborhoods with cars on the street are more likely to have car break-ins), harm street trees and make our neighborhoods less safe (e.g. no room for emergency vehicles, blocked sight lines leading to more collisions of cars and cars with bikes or people). B

We are also finding out that despite the stated goal that all of the infill was necessary so that more low-income housing could be provided, has instead resulted in much of the houses priced upwards of $600,000-$1,000,000+ or mostly expensive apartments owned by wealthy developers. The city's own comprehensive plan indicates that we will need approximately 23,400 new housing units by 2046, but most or all of that is needed for low-income residents; In other words, we have enough high and middle income housing. C

So in effect we watched as our natural environment was destroyed, including the cutting D

of mature trees so that high income housing can be constructed. Unfortunately, the new proposed comprehensive plan's Environmental Impact Statement (EIS) indicates that it will continue and increase the threats to neighborhoods, and by definition trees, by favoring "mixed use" retail placement right in the middle of neighborhoods (e.g. stores and restaurants right next to previously designated R-1 houses) and enshrines the lack of a parking/garage requirement for new housing (see Draft Environmental Impact Statement - City of Spokane, Washington). E

The harm to our natural environment will be extended by the waiving of environmental review, as proposed in the draft EIS. Developers would face even less review than they do now and neighbors are reporting there is a lack of enforcement of the few restrictions in place as it is. Without environmental review what is to keep some developers from destroying land and trees, save private lawsuits that most residents can ill afford and would have spotty application. Therefore, we strongly oppose any effort to remove environmental review as it would lead to the further destruction of our urban forest. F

Furthermore, how would this destruction help the city to achieve its stated goal of a 30% canopy by 2030? We, along with Spokane Urban Nature, stand in support of codes that protect natural lands, wildlife habitat and trees! Relatedly, we also note that there is too little attention paid to the Spocanopy program, an effort that is unique to Spokane, and emphasizes environmental equity. The draft EIS for the proposed comprehensive plan falls far short of these goals and support of this program. G

In sum, the effect of infill exemptions and Options 2 and 3 in particular will open up neighborhoods to exploitive and somewhat unregulated development where retail, restaurants and apartment buildings are placed in the midst of single-family home communities, often with no parking requirements and no room for trees. The waiving of environmental review of development plans will further hinder the ability of our community to develop and maintain vibrant neighborhoods, preserve our natural environment and areas and protect our citizens and resident creatures. We would note that many commentators on the draft comprehensive plan indicate that there is no need for an either/or approach to these options. Rather the city might adopt the best from them to achieve the goals of protecting neighborhoods, increasing environmental integrity and reaching environmental goals (such as air quality through the protection of trees) and provision of affordable housing. But clearly, as offered, none of these options are optimal and will instead lead to just the opposite outcomes. H

Sincerely,

Mary K. Stohr, Ph.D.

Chair, Friends of Spokane Trees

And 50+ Members of Friends of Spokane Trees, including:

Craig Hemmens

Alex Johnson

Sandra Wicht

Janet Yinger

Michele Pajer

Bill Doley

Jennifer Ogden

Jeff Lambert

Cop Coppen

Mary Nagel

Karen L. Byrne

Cc: Spokane City Council Members and Mayor Lisa Brown

From: Telis, Kate
To: Plan Spokane
Cc: maryacjs@gmail.com
Subject: FW: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 4:53:44 PM

Hi Mary,

Just FYI - sending your comments to the planspokane@spokanecity.org email to make sure your comments are received.

Kate Telis
Spokane City Council Member, District 2, Position 2
808 W. Spokane Falls Boulevard, Spokane, WA 99201-3335
(509) 625-6821 office
(509) 425-3401 work cell
ktelis@spokanecity.org

This email is subject to the Washington State Public Records Act, Chapter 42.56 RCW, and may therefore be subject to disclosure as a public record.

From: Mary Stohr <maryacjs@gmail.com>
Sent: Wednesday, February 18, 2026 2:48 PM
To: City Council Members and Staff <citycouncil@spokanecity.org>
Subject: PlanSpokane 2046 Draft EIS Comments

[CAUTION - EXTERNAL EMAIL - Verify Sender]

February 18, 2026

Dear Spokane City Planning Department and City Leaders:

We are writing as members of the group Friends of Spokane Trees (FOST). We have several serious concerns about the Plan Spokane Draft Environmental Impact Statement, especially Options 2 and 3, as they relate to unrestricted development and the placement of retail establishments in our neighborhoods, the waiving of environmental review for most development projects in the city, and the lack of any meaningful protection of our urban forest, air quality, or water resources.

Several developments in Spokane have resulted in the widespread cutting of mature trees on private property; In fact, that is what spurred the creation of FOST. The newish

From: City of Spokane Mayor"s Office
To: Downey, KayCee; Murphy, Maren; Black, Tirrell; Plan Spokane
Subject: Contact Mayor Brown's Office
Date: Tuesday, February 24, 2026 8:21:40 AM
Attachments: Trees-PlanSpokane 2046 Draft EIS Comments.docx

Good morning, All,

This feedback regarding the Plan Spokane initiative came into the @mayor inbox from the Friends of Spokane Trees a group.
Please advise if these follow ups should be shared with any other individuals. Please see attached letter from the group and the contact information of the Chair, Mary Stohr.

Dear Mayor Brown,

I am chair of the Friends of Spokane Trees a group devoted to gaining passage of a city ordinance that will protect trees on private property. I have attached a letter that our group wrote in response to the EIS for the draft Comprehensive Plan for the City. We are very concerned about several items in this EIS and the plan that will harm our tree canopy, destroy neighborhoods further (with infill, lack of parking, retail in the middle of neighborhoods), no room on lots for trees, etc. We hope that you will do something about the planning department that continues to promote policies and practices that are antithetical to the maintenance of healthy neighborhoods and environment. Please read the attached. Thank you, Mary K. Stohr (one of your supporters by the way :)).

Mary Stohr
+1(509)330-6648
mary.stohr@wsu.edu

Respectfully,

Zainab| The Mayor's Office Team | City of Spokane

Emails and attachments sent to or from the City, including personal information, are presumptively public records that are subject to disclosure. – Chapter 42.56 RCW

ref:!00D2E0nuGl.!500WQ01SMnFz:ref

From: Brooke Frickleton
To: Plan Spokane
Cc: Gardner, Spencer
Subject: FW Comments on PlanSpokane draft EIS
Date: Wednesday, February 18, 2026 5:32:59 PM
Attachments: Outlook-qitykkaa.png
Outlook-ahcezs2w.png
260218_FW comments spokane DEIS.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Please find attached Futurewise's comments on the Draft Environmental Impact Statement for the City of Spokane Comprehensive Plan Update 2026–2046 (PlanSpokane),

Please do not hesitate to contact me if you have any questions.

Cheers,

Brooke Frickleton (she/they)
Deputy Legal Director
Futurewise
p: (206) 343-0681
e: brooke@futurewise.org

Book time to meet with me

future wise

1201 3rd Ave #2200, Seattle, Washington 98101
p. (206) 343-0681
futurewise.org

February 18, 2026

Spencer Gardner, Director, Planning Services
City of Spokane
808 W. Spokane Falls Blvd.
Spokane, WA 99201
Submitted via email: PlanSpokane@spokanecity.org

Dear Staff and Consulting Team:

Subject: Comments on the Draft Environmental Impact Statement for the City of Spokane Comprehensive Plan Update 2026–2046 (PlanSpokane)

Thank you for the opportunity to comment on t Draft Environmental Impact Statement for the City of Spokane Comprehensive Plan Update 2026–2046 (PlanSpokane). Futurewise agrees with the City's decision to prepare an environmental impact statement (EIS). The comprehensive plan and the development it will authorize is likely to have a significant probable adverse impact on the environment.

Futurewise is a Washington State nonprofit organization that works to advance healthy, equitable, and opportunity-rich communities through smart land use policy and advocacy. We appreciate the City of Spokane's substantial investment in developing a thoughtful and ambitious Comprehensive Plan update, and we write to offer constructive comments on the Draft Environmental Impact Statement (DEIS).

In addressing the adequacy of a nonproject EIS, the Court of Appeals wrote that:

> In *Leschi v. Highway Comm'n*, 84 Wn.2d 271, 525 P.2d 774 (1974), a majority of the Supreme Court held that the adequacy question is one of law, subject to *de novo* review by the courts. The test to be applied is "whether the environmental effects of the proposed action and reasonable alternatives are sufficiently disclosed, discussed and that they are substantiated by supportive opinion and data." *Leschi v. Highway Comm'n*, *supra* at 286, 525 P.2d at 785.[1]

[1] *Ullock v. City of Bremerton*, 17 Wn. App. 573, 580, 565 P.2d 1179, 1184 (1977).

WAC 197-11-440(6)(a) requires that for the elements of the environment significantly affected by the proposed action, "the EIS shall describe the existing environment that will be affected by the proposal, analyze significant impacts of alternatives including the proposed action, and discuss reasonable mitigation measures that would significantly mitigate these impacts." WAC 197-11-442 (1) provides that the lead agency shall have more flexibility in preparing EISs on nonproject proposals. WAC 197-11-442(2) also provides that for nonproject EISs

> [t]he lead agency shall discuss impacts and alternatives in the level of detail appropriate to the scope of the nonproject proposal and to the level of planning for the proposal. Alternatives should be emphasized. In particular, agencies are encouraged to describe the proposal in terms of alternative means of accomplishing a stated objective (see WAC 197-11-060(3)). Alternatives including the proposed action should be analyzed at a roughly comparable level of detail, sufficient to evaluate their comparative merits (this does not require devoting the same number of pages in an EIS to each alternative).

As is documented below, the DEIS may not comply with these requirements for several elements of the environment.

A

Transportation Analysis: Per Capita VMT Baseline Comparison and the Environmental Case for Alternative 2

We commend the City for using the SRTC regional travel demand model and for presenting VMT per capita as a key comparative metric. This is the right framework for evaluating the land use–transportation nexus at a programmatic scale. However, we identify two significant gaps in the transportation analysis that should be addressed in the Final EIS

The Final EIS should compare per capita VMT under each alternative against existing conditions to demonstrate compliance with RCW 36.70A.070(9)(d)(i)(B).

RCW 36.70A.070(9)(d)(i)(B) requires that the greenhouse gas emissions reduction sub element of the comprehensive plan identify actions that will result in "reductions in per capita vehicle miles traveled within the jurisdiction." This is a mandate to demonstrate actual reductions from current conditions — not merely reductions relative to a No Action baseline.

The DEIS presents per capita VMT for 2046 across alternatives, with Alternative 2 at 19.2 and Alternative 3 at 19.8 (DEIS pp. 3-277, 3-280), both compared only against the No Action alternative at 19.9. However, the DEIS does not present

existing per capita VMT — whether using the 2022 GHG inventory baseline or another current year — alongside those 2046 projections.

Without that comparison, it is impossible to determine whether either action alternative would actually achieve the per capita VMT reductions that RCW 36.70A.070(9)(d)(i)(B) requires. The statute mandates reductions from current conditions, not merely performance better than No Action. A plan that reduces VMT relative to the No Action scenario but leaves per capita VMT at or above today's levels would not satisfy that statutory requirement. A

This gap is particularly consequential because the DEIS's GHG reductions are driven primarily by statewide policies — the 2035 internal combustion engine ban and the 2045 clean electricity mandate — rather than by Spokane's land use decisions. If per capita VMT under either action alternative is projected to remain at or above today's levels, that is a material finding that must appear in the Final EIS and must be addressed in the Climate Element.

The Preferred Alternative should more fully account for the environmental significance of the VMT difference between Alternative 2 and Alternative 3. B

Beyond the baseline comparison issue, the DEIS concludes that "no significant impact to mode share or VMT is expected" under either action alternative, using identical findings for both. This conclusion obscures a meaningful environmental difference between the alternatives that decision-makers should have before them.

The DEIS's own data shows:

Alternative	Daily VMT (2046)	VMT per Capita
Alternative 2 (Distributed & Balanced)	5,732,000	19.2
Alternative 3 (Center City & Regional Hubs)	5,916,000	19.8

Alternative 2 produces approximately 184,000 fewer vehicle miles traveled every weekday than Alternative 3. Annualized over 320 weekdays, this is roughly 59 million fewer VMT per year. Given that transportation accounted for 41% of Spokane's 2022 community GHG emissions, this difference carries material climate significance. The DEIS acknowledges that Alternative 2 produces the lowest transportation emissions of any alternative (DEIS p. 3-49), yet the transportation impact findings treat both action alternatives as equivalent. The driver of this gap is Alternative 3's continued concentration of employment in industrial hubs at West Plains/Airport and Northeast/Hillyard — areas with limited transit access — which generates longer trip lengths and higher total

VMT. This is precisely the land use–transportation tradeoff that a programmatic EIS should illuminate for decision-makers, and the Preferred Alternative and Final EIS should quantify the cumulative annual GHG emissions difference attributable to this VMT gap. B

Water Resources and Aquifer Protection

The Spokane Valley-Rathdrum Prairie Aquifer is a federally designated sole-source aquifer and deserves commensurate analysis in the Final EIS. C

The DEIS acknowledges that the City of Spokane's water supply depends on the Spokane Valley-Rathdrum Prairie Aquifer, which is designated by the U.S. Environmental Protection Agency as a "sole source aquifer" — meaning it is the sole or principal drinking water source for the area and has no reasonably available alternative should it become contaminated (DEIS p. 3-20).

The DEIS also notes that, as a result of an August 2025 ballot measure, the Spokane Valley-Rathdrum Prairie Aquifer Protection Area will be expanded beginning January 1, 2026 to include all areas within the City boundary — an area that previously had no protection area coverage at all. This is a significant change to the regulatory landscape that the Final EIS should fully integrate.

Despite these facts, the DEIS does not include a cumulative impact analysis of how the growth projected under each alternative would affect aquifer recharge rates, impervious surface additions over Critical Aquifer Recharge Areas, or the long-term sustainability of the water supply. The DEIS references a 2025 environmental code audit recommending review of Spokane Municipal Code Section 17E.010 (Critical Aquifer Recharge Area regulations) and lists aquifer protection as a potential mitigation measure, but does not commit to implementing those recommendations or explain how they would be triggered (DEIS pp. 3-30–3-32).

Given that this aquifer supplies more than 50% of the drinking water for the Spokane-Coeur d'Alene metropolitan area and has no reasonable alternative source, the applicable legal standard for protection is correspondingly high. The GMA requires comprehensive plans to "provide for protection of the quality and quantity of groundwater used for public water supplies." RCW 36.70A.070(1). The GMA also requires counties and cities to designate and protect aquifer recharge areas and adopt measures to prevent groundwater contamination and overuse. RCW 36.70A.170; RCW 36.70A.060(2).

The Final EIS should assess whether existing water rights are sufficient to serve projected growth under each alternative. D

The DEIS presents water demand projections by pressure zone through 2042 (DEIS pp. 3-331–3-333) but does not assess whether the City's existing water rights portfolio is sufficient to meet that projected demand. This is an important gap. As Washington State Department of Ecology water resources staff have documented, all of Washington's water is already allocated to a water user — meaning that new demand can only be met through existing water rights, water conservation, or market transactions. In Eastern Washington specifically, groundwater levels are declining in most aquifer layers, and the Lower and Middle Spokane watersheds are projected to experience increasing summer demand against decreasing summer supply, as was scene last summer.

A programmatic EIS that projects significant population and employment growth through 2046 without analyzing whether legally and physically available water exists to serve that growth is analytically incomplete. The Final EIS should confirm whether the City's existing water rights are sufficient to serve the projected growth under each alternative, and if not, what water supply strategy the City proposes to address that gap.

The Final EIS should specifically analyze the interaction between projected West Plains growth and the identified PFAS contamination in that area. E

The DEIS identifies per- and polyfluoroalkyl substances (PFAS) contamination in private-well groundwater in the West Plains region of the city (DEIS pp. 3-13–3-14). Both Alternatives 2 and 3 contemplate growth and employment concentration in the West Plains/Airport area. The Final EIS should specifically analyze how projected growth in that subarea interacts with the identified PFAS contamination, and what regulatory tools the City will use to protect groundwater quality in the expanded Aquifer Protection Area.

Higher-density, compact growth supports aquifer sustainability — an additional environmental advantage of Alternative 2. F

Research demonstrates that higher-density, multifamily housing types use significantly less water per capita than large-lot, low-density development — both indoors and outdoors. The U.S. EPA has documented that compact growth, by reducing service line lengths and outdoor irrigation demands, can reduce total residential water demand by 5–25% over lower-density alternatives. Alternative 2's greater emphasis on multifamily housing and its distributed centers-and-corridors approach means it would likely generate less per capita water demand

than Alternative 3's higher employment growth scenario. The Final EIS should quantify this difference as part of the utilities analysis.

Housing Element: HB 1220 Compliance and Displacement Risk

We commend the City for conducting and publishing a racially disparate impacts analysis in September 2025. The findings — documenting persistent BIPOC homeownership gaps, the legacy of exclusionary zoning and redlining, environmental health disparities, and uneven distribution of housing growth — are honest and substantive. This positions Spokane well for a GMA-compliant housing element.

First, the Final Plan should demonstrate housing capacity disaggregated by income band. G

HB 1220 requires that jurisdictions plan for and accommodate housing affordable to all income levels, and that the housing element document adequate provisions for extremely low, very low, low, and moderate-income households specifically. The DEIS references capacity for "all income levels" and HB 1220 compliance in general terms. The Final Plan's housing element should include a table confirming that sufficient zoned and buildable capacity exists for each income tier, consistent with Commerce's Housing Element guidance.

Second, the Final Plan's policy response should match the strength of the disparate impacts diagnosis. H

RCW 36.70A.070(2)(e)–(h) requires jurisdictions to "implement policies and regulations that begin to undo" identified racially disparate impacts. We encourage the Final Plan to include specific, mandatory anti-displacement tools such as: targeted rezoning in historically excluded neighborhoods rather than only high-opportunity areas; affordable housing preservation requirements in high-displacement-risk areas; and explicit linkage between the Target Investment Area strategy and affordability outcomes for BIPOC households.

Climate Element: Strengthening Local Policy Commitments

The DEIS GHG analysis uses a 2022 baseline and presents projections against the City's adopted reduction targets (45% by 2030, 70% by 2040, net-zero by 2050). We support this framework. However, as noted in Section I above, the heavy reliance on statewide EV and electricity mandates to drive projected reductions I

raises a fundamental question about local accountability: what does Spokane's own plan contribute? I

RCW 36.70A.070(9)(d)(i)(A) requires that the Climate Element identify actions that will result in "reductions in overall greenhouse gas emissions generated by transportation and land use within the jurisdiction." The Final EIS should include a "policy wedge" analysis isolating the GHG reductions attributable to Spokane's specific land use decisions — infill siting, TOD density, parking reform, TDM requirements — from the reductions that would occur regardless under state law. This analysis is recommended by Commerce's climate planning guidance and is necessary for the Climate Element to demonstrate independent compliance with RCW 36.70A.070(9)(d)(i)(A). J

We also encourage the Final Plan's Climate Element to include specific implementation commitments rather than exploratory language. Rather than "the City will consider TDM strategies," the plan should commit to adopting specific TDM standards, parking reform, and building decarbonization regulations by a date certain. Alternative 2's lower VMT profile and higher multifamily share position it well to support these commitments. K

Conclusion

Our core recommendations are: (1) the Final EIS should present existing per capita VMT alongside the 2046 alternative projections, so decision-makers can evaluate compliance with RCW 36.70A.070(9)(d)(i)(B)'s requirement for actual reductions from current conditions; (2) the Final EIS should include cumulative aquifer impact analysis and confirm water rights sufficiency for projected growth, consistent with the January 2026 expansion of the Aquifer Protection Area; (3) the Final Plan's housing element should disaggregate capacity by income band and include binding anti-displacement tools; and (4) the Climate Element should isolate Spokane's own policy contributions to GHG reduction and include a binding implementation schedule.

On alternative selection, we encourage the City to give full weight to the environmental advantages that Alternative 2 demonstrates across transportation, GHG emissions, water demand, and housing affordability, and to make those advantages explicit in the preferred alternative selection rationale. L

We look forward to continued engagement as the City moves toward Final EIS and Final Plan adoption. Thank you for considering our comments.

Thank you for considering our comments. If you require additional information, please contact me at email: brooke@futurewise.org

Sincerely,

Brooke Frickleton, WSBA No. 55580
Deputy Legal Director

REFERENCES

State Law and Agency Guidance

- RCW 36.70A.070(9)(d)(i)(A)–(B): GHG Emissions Reduction subelement requirements, including overall GHG reductions and per capita VMT reductions. Available at: https://app.leg.wa.gov/RCW/default.aspx?cite=36.70A.070.
- RCW 36.70A.070(2)(e)–(h): Housing element requirements to identify and implement policies to address racially disparate impacts, displacement, exclusion, and displacement risk.
- RCW 36.70A.070(1): Comprehensive plan land use element must provide for protection of the quality and quantity of groundwater used for public water supplies.
- RCW 36.70A.170 and RCW 36.70A.060(2): Critical areas designation and protection requirements, including aquifer recharge areas.
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Water Resources

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Ecology Water Resources Program Manager, on full allocation of Washington's water resources.

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Transportation and Climate Science

- Cascadia Consulting Group, Greenhouse Gas Emissions Analysis for City of Spokane Comprehensive Plan Update EIS (2025). Referenced in DEIS Section 3.2, Exhibit 3.2-8. Source for finding that Alternative 2 produces the lowest energy and transportation emissions across all alternatives.
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From: Dante Jester
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 1:04:40 PM
Attachments: Outlook-tyupshcy.png

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hi Plan Spokane team,

I just finished doing a review of the draft EIS. Thank you for your excellent work towards such a massive undertaking! Though I would have liked to have time to really dig into each of the 600+ pages, for the sake of time I focused on trying to find sections related to my work keeping Spokane community members safe from the impacts of extreme heat and wildfire smoke. I also kept an eye out for any possible alignment/compliments with the Spokane Community Resilience Action Plan that the resilience collaborative is working on right now (it will be finished and publicly available right around the same time as this EIS).

Overall, I don't have much in the way of feedback, though please do know that if you have any particular areas you would like me to focus on and provide input on as it relates to my area of work, I would be happy to. Our specialty is collecting community-engaged research, and I am happy to utilize the data we have to answer any questions. I was excited to see mention of resilience hubs as a mitigation measure in 1.4.4. Other mitigation measures that we're exploring in the resilience plan include the integration of ventilation corridors for both cooling and improved air quality, updating SMC to require cool roofing on new construction, and a preference for preserving/installing green infrastructure whenever possible. Mostly, I just wanted to thank you for taking on this important work. I know it's a requirement that we do the comprehensive plan update, but I think the focus on gathering community feedback throughout the process has been well done on your part. Thank you! A B

Dante Jester, MSc
Climate Resilience Program Manager
Institute for Climate, Water, & the Environment
Pronouns: they/them/ella
PHONE 509.313.3818
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Institute *for* Climate, Water, *and the* Environment

Working hours: 6am-4:30pm, M-Th

From: dianajpainter@gmail.com
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 4:12:04 PM
Attachments: Letter to City re Spokane Plan EIS_2-18-2026.pdf

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

Thank you for the opportunity to submit these comments.

Diana

Diana J. Painter, PhD
Painter Preservation
Spokane, Washington
Tel: 707-763-6500
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Web: www.preservationplans.com

Painter Preservation
HISTORIC PRESERVATION & URBAN DESIGN

Tirrell Black, Assistant Planning Director
City of Spokane
Department of Planning Services
808 W. Spokane Falls Blvd.
Spokane, WA 99201

Re "PlanSpokane 2046 Draft EIS Comments".

Dear Ms. Black,

Thank you for the opportunity to comment on the Draft EIS for the new Comprehensive Plan. I was also able to attend the February 10th "listening session" at Shadle and ask some questions as well. The planners indicated that Alternative 2 and 3 were the ones that accommodated or focused desired growth, but that there was also an opportunity to 'mix and match' new policies.

If I had to choose an alternative, I would probably favor Alternative 2. My overarching concern is preserving the character of downtown Spokane and its neighborhoods. I would like to see a greater emphasis on infill development in the downtown (those surface parking lots!) and along the significant arterials such as Division, where there is so much vacant or under-utilized land. And of course Division will provide an excellent opportunity for bus rapid transit and streetscape improvements in the future. I also like the emphasis placed on connectivity and the variety of open spaces in the plan and the protection of natural areas. A

My areas of interest are primarily urban design and historic preservation, because these, along with transit-oriented development, are the areas I've worked in in my career. I am sorry to see in the Abbreviated Summary of Impacts in the Draft EIS Summary that, "All the alternatives have the potential for significant adverse impacts to cultural resources," and that this is the ***only*** subject area in the plan with significant adverse impacts that could presumably not be mitigated. This is a huge disappointment to me. The historic character of Spokane is one of the reasons I live here and one of the ways in which this city is distinguished from say, Seattle (my home town). B

In general, I do not support eliminating, relaxing or streamlining policies and regulations in order to achieve other goals, such as housing density or urban infill. Although I recognize that some flexibility is desirable in planning processes, I would rather that policies and regulations set out to achieve the intended vision rather than implying that some sort of exemption or negotiation process may be possible in the future. C

I will submit comments on the Draft Urban Design & Historic Preservation Comprehensive Plan chapter at a later date.

Sincerely,

Diana Painter

Diana J. Painter, PhD
Owner/Principal Architectural Historian

MAILING ADDRESS: 3518 NORTH C STREET • SPOKANE, WA 99205
CONTACT: EMAIL DIANAJPAINTER@GMAIL.COM • CELL 707-763-6500

From: Black, Tirrell
To: Plan Spokane
Subject: FW: Rockwood South Overlay/Zone Change
Date: Wednesday, January 21, 2026 1:20:44 PM
Attachments: image001.png

Tirrell Black
Planning & Economic Development
City of Spokane
tblack@spokanecity.org
509-625-6185

From: Jim Maxwell <Jim@rockwoodretirement.org>
Sent: Wednesday, January 21, 2026 12:56 PM
To: Black, Tirrell <tblack@spokanecity.org>; Gardner, Spencer <sgardner@spokanecity.org>; Thompson, Tim <tthompson@spokanecity.org>; Freibott, Kevin <kfreibott@spokanecity.org>
Cc: Andrew Gorton <andrewg@rockwoodretirement.org>; 'dhume@spokane-landuse.com' <dhume@spokane-landuse.com>
Subject: RE: Rockwood South Overlay/Zone Change

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Thank you for your presentation last night Tirrell. Andy Gorton, Rockwood's Vice President of Operations and myself Jim Maxwell, President and CEO, were the ones in attendance last night.

As you likely know, we represent over 500 residents on around 100 acres, including 166 independent homes, 140 independent apartments, and 76 assisted living and memory care units and 45 beds of skilled nursing. We provide employment to over 300 employees.

We have a great long range master plan which we developed and have shared that really aligns with the cities goals for increased density in the area you discussed. You also mentioned the increase in need for housing for the huge wave of older adults that is coming which is in line with our mission. Our waitlist on our South Hill campus has grown to over 850. Our future developments are going to provide valuable housing and services for seniors along with more employment. Another side of our developments is that as residents move to our community, this frees up homes in our surrounding community for new residents to purchase and live in.

We will continue to submit our input. Our hope is the new comprehensive plan helps us both achieve our similar goals. It has been tough on us not being able to address a need that our community has over the past 2 plus years waiting on this process so we can move forward.

A

Thanks,
Jim

James A. Maxwell
President and CEO

Rockwood Retirement Communities
2903 E. 25th Ave.
Spokane, WA 99223

T: 509.536.6658
Fax: 509.536.6662
www.rockwoodretirement.org

From: Black, Tirrell <tblack@spokanecity.org>
Sent: Wednesday, January 21, 2026 10:40 AM
To: dhume@spokane-landuse.com
Cc: Jim Maxwell <Jim@rockwoodretirement.org>; Gardner, Spencer <sgardner@spokanecity.org>; Thompson, Tim <tthompson@spokanecity.org>; Freibott, Kevin <kfreibott@spokanecity.org>
Subject: RE: Rockwood South Overlay/Zone Change

Hi Dwight,
Thanks for your interest in the comp plan update.

I did present on the Draft EIS and the update to the Comprehensive Plan at the Lincoln Heights NC last night. There were a few people there who identified themselves as from Rockwood, but I don't know if they were residents there or represented the organization.

We are not yet at that level of detail in our work re site specific requests. However, we welcome comments on the growth alternatives to PlanSpokane@spokanecity.org This link to our StoryMap for the project shows the growth alternatives that have been analyzed in the DEIS. Please put "PlanSpokane 2046 Draft EIS Comments" in the subject line.

We also expect to start working on the updated Development Code later this year. Please watch our newsletter for information on that.

Happy to discuss further if helpful,
Sincerely,
Tirrell

PLANSPOKANE
Resilient | Connected | Livable | 2046

Tirrell Black, AICP | City of Spokane | Assistant Director | Planning & Economic Development
509-625-6185 | *main* 509-625-6500 | tblack@spokanecity.org https://my.spokanecity.org/planspokane/

From: dhume@spokane-landuse.com <dhume@spokane-landuse.com>
Sent: Tuesday, January 20, 2026 10:29 AM
To: Black, Tirrell <tblack@spokanecity.org>
Cc: Jim Maxwell <Jim@rockwoodretirement.org>
Subject: Rockwood South Overlay/Zone Chnage

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Tirrell: Spencer referred me to you and your EIS Draft to address a better land use designation for Rockwood South. Both he and Kevin had indicated that they wanted to explore the use of an Overlay, like Gonzaga on the Rockwood South property. When I recently inquired about the appropriate time to schedule a meeting with him and Kevin, I received instructions to comment on the draft EIS being managed by you.

Furthermore, I understand that you are meeting with the LHNC tonight to share your thoughts on the draft EIS. Is this the time and place to address the overlay concept and procedure of amending the SMC to better accommodate the future growth of Rockwood South?

Dwight J. Hume
Land Use Solutions & Entitlement
9101 N Mountain View Lane
Spokane, WA 99218
509-435-3108

Important: The information contained in this e-mail is privileged and confidential. This information is intended for the addressee only. If you have received this information in error, please destroy the documents immediately and notify the sender at the above address by using the reply button. Use and release of this information is strictly limited by the current Health Insurance Portability and Accountability Act (HIPAA).

From: Gabriella Reese Hultman
To: Plan Spokane
Cc: Michael Pearson; Laura A Woods
Subject: Environmental Impact Statement
Date: Wednesday, February 18, 2026 4:59:25 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Municipal Government of Spokane,

My name is Ella Hultman and I am the president of the Environmental Club at Spokane Falls Community College. CC'd on this email is Dr. Michelle Pearson, and Laura Woods, our faculty advisors. Our club has looked over your full EIS document and we have some concerns that we wish to address.

As the most pressing issue, the snowpack on all the mountains in Washington state has been at a historic low. In addition, our summer temperatures have been rising with record breaking or near record breaking highs with drought conditions found state-wide. These factors give us some concerns over what the fire season will look like, as well as the cities plan for handling water usage, especially considering the dire condition of the Spokane river.

-What we want to see is a bigger crack down on the water usage of decorative/recreational activities in the city, such as golf courses. A proposed course of action would be them using less water and implementing drought resistant grasses where they can. A

- Additionally, adding tree cover to the city would help with heat distribution as these summer temperatures continue to rise and would increase air quality as fire seasons become longer and more severe. B

Another concern we have is the amount of PFAS that is present in ground water over a majority of the city and surrounding areas.

-We would like to see collaborations with institutes and municipalities to reduce current levels, and make regulation of the usage of PFAS- even if it's at a local level. C

Also locally, we want to see an improvement of the maintenance and care of the rivers.

- Most urgently, we want to see efforts made to improve the water quality working towards the reintroduction of local fish populations when the river is deemed safe and access provided for previously local anadromous fish. D

We thank you for taking your time to read this email and consider what we wanted

to say.

With regards, Ella Hultman

From: Katelyn Scott
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 3:26:46 PM
Attachments: City of Spokane PlanSpokane Draft EIS Comment Letter.pdf

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

Please see attached our comments on the Draft EIS. We appreciate the opportunity to comment and look forward to seeing the responses.

Thank you,

Katelyn Scott
Water Protector
(she/her/hers)
Spokane Riverkeeper
katy@spokaneriverkeeper.org
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SPOKANE RIVERKEEPER®
Together. For the River.

Tirrell Black, Assistant Planning Director
City of Spokane
808 W Spokane Falls Blvd.
Spokane, WA 99201

Re: Draft Environmental Impact Statement – 2024 Comprehensive Plan Update

Dear City of Spokane Planning Team,

Spokane Riverkeeper appreciates the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the City of Spokane's 2024 Comprehensive Plan Update. Our organization works to protect and restore the Spokane River and its watershed, including its fish, wildlife, and groundwater resources. We offer the following observations and recommendations regarding water resources, river and aquifer protection, and the iconic native Redband trout.

Spokane Riverkeeper is a non-profit, advocacy organization that works to protect the Spokane River Watershed. The mission of the organization is to protect and restore the health of the Spokane River watershed, defend access to clean water, and the opportunity for all communities to enjoy the benefits of a clean and healthy Spokane River.

The Spokane River is more than a scenic amenity; it is a lifeline for the community and a critical ecological system. The Spokane River provides essential habitat for a remnant population of Redband trout, a species of concern and a barometer of aquatic health. These trout are descendants of historically anadromous steelhead, landlocked by downstream Columbia Basin hydropower development. Redbands thrive in clean, cool, low-gradient rivers like the Spokane. Studies by the Washington Department of Fish and Wildlife indicate that populations in the upper Spokane River have declined nearly 75% since the 1990s. This decline is driven by habitat degradation, including removal of native riparian vegetation, construction of docks and overwater structures, sedimentation, nutrient pollution, warming water temperatures, and the proliferation of invasive species such as bass.

Redband trout require gravel riverbeds free of silt and excess nutrients such as phosphorus, which promote algae growth and deplete dissolved oxygen to successfully spawn and survive in

the watershed. Flooding events, like those on Hangman Creek in February of 2025, transport sediment into the Spokane River, damaging spawning grounds and aquatic insect populations that trout rely on for food. Ongoing shoreline and river-adjacent projects have the potential to further harm these sensitive habitats if conducted without careful planning and protections. Protecting riparian vegetation and shoreline forests is therefore essential to maintain water quality, moderate temperatures, and reduce sediment impacts.

Looking forward, any planning and development in the Spokane River watershed must also consider the potential for future salmon reintroduction. Restoring salmon to the Spokane River would require cool, clean flows, intact riparian buffers, and healthy in-stream and floodplain habitat, all of which are directly influenced by land use, stormwater management, and groundwater withdrawals. The Comprehensive Plan should ensure that growth, redevelopment, and infrastructure investments support these ecological conditions rather than degrade them, providing a river system resilient enough to sustain salmon populations alongside Redband trout and other native species. Proactive measures now, such as protecting undeveloped lands, reducing impervious surfaces, restoring shoreline vegetation, and maintaining sustainable aquifer and river flows, will determine whether salmon reintroduction efforts can succeed in the coming decades. A

The Spokane River and the SVRP Aquifer are inseparably linked. The aquifer underlies roughly 370 square miles across Washington and Idaho, with some areas flowing as much as 60 feet per day, and contains an estimated 10 trillion gallons of water, making it one of the most productive aquifers in the country. It is the sole source of drinking water for over 600,000 residents of Spokane and Kootenai counties and contributes approximately 60% of the Spokane River's annual outflow. Water from lakes, mountain streams, precipitation, and the river recharge the aquifer, and small changes in aquifer levels can dramatically alter river flows. Last year's dry river event served as a stark warning: if we mismanage our water resources, the river will disappear and threaten the underlying aquifer, causing cascading ecological, social, and economic impacts. The DEIS must fully account for this interconnection by prioritizing conservation, sustainable water use, and recharge protection in land-use planning. This also means continuing to conduct environmental assessments to ensure water resources remain intact. B

Population and housing growth must be balanced with river and aquifer health. While concentrating growth along existing centers and transit corridors can reduce sprawl, the DEIS should explicitly ensure that environmental review protects river-adjacent lands, floodplains, and undeveloped recharge areas. Redevelopment, infill, and higher-density housing must incorporate river-friendly stormwater management, low-impact development, riparian buffers, and green infrastructure to prevent sediment and nutrient loading and maintain cool, clean water for aquatic species. Industrial expansion similarly must avoid runoff, pollution, and habitat loss. C

Public services and utilities intersect with river health in critical ways. Trash and litter from unsheltered camps along the river have become a significant source of pollution, with over half of riverine trash originating from these camps. Spokane Riverkeeper has removed over 285,000 pounds of trash over the past decade, including 57,000 pounds in 2025 alone, yet cleanup alone does not solve the problem. Effective programs that integrate trash removal, outreach, and support services, like our floating clean-up and medical outreach model, have proven that people want to keep the river clean when given the tools to do so. Expanding such programs, including employing individuals with lived experience, providing consistent clean-up, and rapidly addressing abandoned camps, will reduce river pollution without criminalizing unsheltered individuals. Effective planning under the Comprehensive Plan must recognize that managing growth and housing affordability is not only a social imperative but also an environmental one: by ensuring safe, accessible housing options throughout the city, we reduce the pressure on river corridors, decrease the volume of trash entering the Spokane River, and support broader river stewardship efforts already underway by organizations like Spokane Riverkeeper

D

E

Climate change, flooding, and stormwater management further underscore the need for careful planning. Floods like those in 2016–17 and 2025 transport sediment, cover spawning substrates, and stress aquatic ecosystems. Green infrastructure, riparian restoration, limits on impervious surface expansion, and rigorous stormwater standards are essential to prevent damage to fish and invertebrate populations. Water conservation, including low-water-use landscaping, rainwater capture, and efficient irrigation, must be aggressively implemented to maintain aquifer levels and river flows under a warming climate.

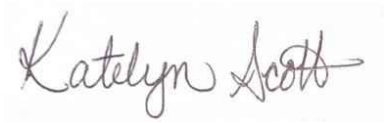
In conclusion, the DEIS and Comprehensive Plan Update must treat the Spokane River and SVRP Aquifer as central to the city's environmental, social, and economic health. We strongly recommend:

F

1. Protecting and restoring riparian forests, shoreline vegetation, and floodplains.
2. Ensuring environmental review and development regulations safeguard undeveloped lands, river corridors, and aquifer recharge zones.
3. Expanding water conservation measures across all sectors to maintain river flows and aquifer health.
4. Strengthening stormwater management and low-impact development standards to reduce sediment and nutrient loading.
5. Implementing structured trash management and outreach programs for unsheltered populations along the river.
6. Monitoring and managing aquifer-surface water interactions to maintain sustainable flows for fish, human use, and climate resilience.
7. Avoiding development patterns or projects that further degrade Redband trout habitat, including shading, sediment, and invasive species pressures.

The health of the Spokane River is inseparable from the health of the city and its people. Protecting this resource now ensures clean water, resilient ecosystems, and a thriving community for generations to come.

Sincerely,



Katelyn Scott, Esq.
Water Protector
Spokane Riverkeeper

From: Rose Noble
To: Plan Spokane
Subject: Feedback
Date: Tuesday, February 17, 2026 11:57:16 PM
Attachments: image002.png
image003.png
PlanSpokane_feedback.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Plan Spokane Team,

Attached is our feedback for consideration as Plan Spokane 2046 advances.
At its core, we want you to be thinking about tourism as a main economic driver and essential to residents' quality of place.

Thank you,

Rose Noble, CDME | President & CEO



w. 509.742.9370
801 W Riverside Ave Ste 100
Spokane, WA 99201
VisitSpokane.com

VISIT SPOKANE

VISIT SPOKANE

Dear PlanSpokane Team,

On behalf of Visit Spokane, thank you for the thoughtful and comprehensive Community Visioning Engagement Summary and for the extensive outreach conducted across neighborhoods and districts. The themes reflected throughout the document (vibrancy, walkability, arts and culture, local businesses, access to nature, and inclusive community spaces) strongly align with what makes Spokane not only a great place to live, but a competitive and resilient destination.
As the official destination marketing and management organization (DMO) for Spokane, we offer the following feedback and recommendations for consideration as PlanSpokane 2046 advances.

1. Tourism Is a Core Economic Driver - Especially When It Is Year-Round

Tourism is a foundational economic sector for Spokane and should be explicitly considered in comprehensive planning decisions related to land use, transportation, infrastructure, arts and culture, and neighborhoods. Equally important, the long-term health of this sector depends on Spokane's ability to support year-round visitation, not just peak-season demand.
According to Tourism Economics' 2024 Economic Impact of Tourism analysis:

- Spokane County welcomed 10.1 million visitors in 2024
- Visitors generated $1.53 billion in direct visitor spending, producing a total economic impact of $2.4 billion
- Tourism supported approximately 18,000 jobs, representing 1 in every 19 jobs in Spokane County
- Visitor activity generated $233 million in state and local tax revenues, providing an estimated $1,080 in household tax relief per household

Year-round tourism strengthens these outcomes by:

- Supporting stable, full-time employment, rather than seasonal or cyclical work
- Sustaining small businesses and neighborhood-serving commercial districts throughout the calendar year
- Maximizing the return on public investments in infrastructure, facilities, parks, and cultural venues
- Reducing pressure on peak-season systems while improving utilization in shoulder and winter months

As PlanSpokane 2046 evaluates growth alternatives and long-term infrastructure needs, planning for consistent, year-round economic activity rather than seasonal spikes, should be an objective.

A

2. Visit Spokane Should Have a Seat at the Table in Long-Range Planning

Given tourism's scale, impact, and growing emphasis on year-round visitation, Visit Spokane should be an ongoing stakeholder in the PlanSpokane 2046 process, not solely as a marketing entity, but as a partner in shaping the city Spokane is becoming.
This includes collaboration on:

- Land-use and zoning decisions that support mixed-use districts, hotels and cultural facilities
- Transportation and mobility planning that ensures safe, accessible, all-season movement for residents and visitors alike
- Public-realm investments that encourage winter activation, shoulder-season programming, and everyday use
- Economic development strategies tied to arts, culture, events, and experience development

B

VISIT SPOKANE

Visitors and residents rely on the same systems. When those systems are designed to function well in all seasons, they improve quality of life for residents while strengthening Spokane's economic resilience.

3. Creative Placemaking Is Spokane's Competitive Advantage and a Year-Round Strategy

Across workshops and surveys, community members consistently identified arts, culture, public spaces, walkable neighborhoods, local businesses, and "third places" as central to Spokane's future. These priorities align directly with Visit Spokane's focus on creative placemaking and experience development. C

Creative placemaking is especially critical to year-round tourism, because it:

- Activates neighborhoods beyond summer months
- Encourages indoor and outdoor cultural programming in all seasons
- Supports local businesses during shoulder and winter periods
- Creates reasons to gather, linger, and return throughout the year

Visitor spending in 2024 strongly reflects the value of place-based experiences:

- Food & Beverage: $429 million
- Lodging: $376 million
- Retail: $328 million
- Recreation & Entertainment: $133 million

These sectors thrive in environments that are human-scaled, culturally rich, and intentionally activated year-round. Investments in public art, cultural districts, events, and neighborhood gathering spaces are are economic infrastructure.

4. Experience Development Must Keep Pace with Population Growth

As Spokane plans for continued population growth through 2046, it is essential that experience development keeps pace with housing, employment, and infrastructure growth, and that it does so with a year-round lens. D

This includes:

- Arts and cultural facilities designed for four-season use
- Neighborhood centers that function as daily gathering places, not just event destinations
- Public spaces that are safe, welcoming, and usable year-round
- Events and programming that animate the city beyond peak summer months

Planning for growth without proportional investment in experiences risks weakening both resident satisfaction and economic returns.

Visit Spokane appreciates the City's commitment to an inclusive and forward-looking comprehensive plan. We encourage the City to formally recognize tourism as a year-round economic system within PlanSpokane 2046 and to engage Visit Spokane as a partner in shaping policies and investments that support livability, resilience, and sustainable growth.

We look forward to continued collaboration and are eager to support this work with data, insights, and community partnerships.

Sincerely,
Visit Spokane

VISIT SPOKANE

Appendix A

Visit Spokane – Recommended Actions for PlanSpokane 2046
Supporting Year-Round Economic Vitality, Creative Placemaking, and Experience Development

E

Tourism is a year-round economic system that contributes significantly to Spokane's employment base, tax revenues, small business vitality, and quality of life. As Spokane plans for continued population growth and long-term infrastructure investment through 2046, integrating tourism considerations, particularly those that support four-season use of the city, will strengthen economic resilience and maximize public return on investment.

The following recommended actions are intended to be incorporated into PlanSpokane 2046 goals, policies, implementation strategies, and evaluation criteria.

Recommended Actions

1. Recognize Tourism as a Year-Round Economic System

- Formally acknowledge tourism within the Comprehensive Plan as a year-round contributor to Spokane's economy, workforce stability, and fiscal health.
- Align tourism considerations with housing, employment, and population growth assumptions used in long-range planning.

2. Establish Ongoing DMO Participation in Plan Implementation

- Include Visit Spokane as an ongoing stakeholder in PlanSpokane 2046 implementation, particularly in areas related to:
    - Land use and zoning
    - Transportation and walkability
    - Arts, culture, and public-realm investment
    - Economic development and neighborhood activations

3. Integrate Year-Round Experience Development into Land-Use Policy

- Incorporate policies that support mixed-use districts
- Encourage adaptive reuse, ground-floor activation, and flexible space design that supports daily use, events, and seasonal programming.

VISIT SPOKANE

4. Prioritize Creative Placemaking as Economic Infrastructure

- Treat creative placemaking, including public art, cultural districts, events, and neighborhood gathering spaces, as core economic infrastructure, not discretionary amenities.
- Embed placemaking strategies within economic development, land-use, and capital investment policies.

5. Design and Fund Public Spaces for Four-Season Use

- Establish planning and design standards that support year-round usability of parks, plazas, streetscapes, and civic spaces.
- Prioritize investments that enable winter activation, shoulder-season programming, and everyday community use.

6. Align Transportation and Mobility Planning with Year-Round Use

- Ensure transportation policies support safe, accessible, all-season mobility for residents *and* visitors.
- Emphasize walkability, accessibility, and lighting

7. Support Small Businesses and Local-Serving Commercial Activity

- Use zoning, code flexibility, and adaptive reuse strategies to support small businesses, local retail, food and beverage, and cultural enterprises that benefit from consistent year-round activity.

9. Incorporate Tourism and Visitor Data into Plan Monitoring

- Utilize tourism and visitor economy data as part of PlanSpokane 2046 monitoring and performance evaluation.
- Track outcomes related to livability, economic vitality, public-realm use, and year-round activation.

Integrating these actions into PlanSpokane 2046 will help ensure that Spokane's growth supports a resilient, inclusive, and vibrant community. One that functions well for residents every day of the year while sustaining a strong and diversified economy.

Visit Spokane looks forward to continued collaboration and stands ready to support implementation with data, partnerships, and expertise.

E

From: prue addy
To: Plan Spokane
Subject: Protection of
Date: Tuesday, February 17, 2026 3:41:25 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I moved away from Spokane and returned 2 years ago. The city had grown and grown, Southhill where I had lived packed with new traffic, downtown impacted by individuals and groups needing more than a location to stay in. What is being presented now is to focus on housing rather than conscious communities which, in 2046 will be so appreciated. Nature and it's ability to heal us all far outweighs the strengths needed to now make decisions based on need rather than want of something for its profits. A

Thank you for reading and planning possibly differently.
My Best,
Prudence Addy

Sent from my iPhone

From: Diane Adler
To: Plan Spokane
Subject: Plan spokane 2046 draft EIS
Date: Monday, March 2, 2026 6:26:54 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, provide needed wildlife habitat and corridors, and protect clean air and water for all residents in Spokane.

I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!

Sincerely,

Diane Adler

99224

Sent from my iPad

From: Alyssa Agee
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 10:24:09 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

To the Decision Makers for the 2046 EIS

I am urging you to keep the Environmental Review in place and I strongly oppose the balkent exemption. This review protects critical areas such as wetlands, forests, wildlife habitat and riparian areas in our neighborhoods. B

I urge you to support the tree and natural land inventory. Our canopy goal of 30% relies on the inventory to inform. A

I want to see that there is environmental review exemption only if 100% disturbed and impervious area. We need to be thinking about the long-term impact and not just settling for quick fixes to encourage development in-fill in the city. If anything, we need to be doing a better job of safeguarding our natural land for future generations. B

Please make sure there is an enforceable critical areas ordinance in order to protect critical areas, trees, habitats, water quality and more. There are unprotected natural lands through the City of Spokane. C

I also support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

As a City of Spokane business owner, civic leader, and tax payer in good standing I am urging you to protect the natural beauty of our region for present and future enjoyment and the safety, wellbeing and vitality of ALL life (plant, animal, and human)

Thank you,

Alyssa Agee

South Hill Resident, Owner of Emma Rue's and People's Waffle, Owner of the Symons Block Building

From: ywilliams1xx1
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Thursday, February 19, 2026 7:58:42 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

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Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Yvonne Ahlborn
Westview Neighborhood

Sent from my Verizon, Samsung Galaxy smartphone

From: David Allen
To: Plan Spokane
Cc: MacDonald, Steven
Subject: Plan Spokane Comments
Date: Thursday, March 5, 2026 8:47:18 PM
Attachments: PlanSpokane - Public Comment_David Allen.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Mr. Black,

I just realized the public comment deadline for the PlanSpokane environmental review was 5:00 p.m. today, but I'm hoping my comments might still be considered if possible. I've attached them here.

I really appreciate the work your department is doing to improve walkability and zoning in Spokane. My comments primarily focus on further studying VMT outcomes related to corridor intensification, particularly in North Spokane.

Walkable neighborhoods and development are a personal passion of mine, and much of my professional career has been focused on pursuing that goal. I hope the perspective is helpful as the work continues.

Thank you again for the effort your team is putting into this process.

Sincerely,

David Allen | Principal
m: 509-280-5469
trestlebuild.com

Trestle

David Allen
Comstock Resident
Spokane, WA 99203

March 5, 2026

Tirrell Black, Assistant Planning Director
City of Spokane
808 W Spokane Falls Blvd.
Spokane, WA 99201

RE: Spokane Forward Environmental Review

Dear Mr. Black:

I am a Spokane resident and real estate developer who works directly with zoning and housing feasibility. My job requires evaluating whether regulations on paper translate into projects on the ground. I'm writing because I am concerned that none of the proposed plans go far enough to deliver the walkability and reduced VMT. A

Spokane has something many cities would love, a strong street grid and historic neighborhood commercial streets that form good bones. What we lack is an effective strategy to turn those bones into a truly walkable city.

After reviewing Section 3.4 (Land Use and Urban Form), Alternative 2 appears to be the most balanced option. If that is the likely path forward, the question becomes whether it is strong enough to achieve its environmental goals.

1. **Walkability and VMT:** The report assumes that development intensity leads to lower VMT. There is a correlation between the two, but not necessarily causation. B

   It is possible to add density without creating walkability. For example, 29th & Grand, and 29th and Regal represent relatively intense development patterns, yet remain largely car centric. Similarly, intensifying corridors like Wellesley, Francis and Division may not lead to the walkability projected in the report. If you're familiar with Seattle, this would be like intensifying Aurora (hwy 99) instead of strengthening neighborhood main streets like Queen Anne or Fremont.

   For walkability to increase there must be: C
   a. Places that can be safely and pleasantly walked to.
   b. People living and working withing walking distance of those places.

To achieve VMT goals we need to allow for human scale street design and development standards in areas where people feel safe walking. Perhaps counterintuitively, this is not along arterials, but calmer neighborhood main streets like Garland, Grand, Market Street (NW Blvd perhaps being the busiest exception). D

2. **Adequacy of Identified Nodes:** Option 2 still leave large swaths of neighborhoods inadequately served by walkable neighborhood retail and mixed use. To create walkability for more Spokanites we need to bring new neighborhood commercial nodes to existing development. E

   For example, while the South Hill is blessed a streetcar-oriented, historic grid pattern, it misses opportunities for intensity along Cedar, Lincoln, W. 29th and 37th.

   Another example is Lincoln and 10th which is a highly desirable node, which currently lacks “umph” and walkability to adequately serve the mid-South Hill.

   If we want real walkability, we should consider adding neighborhood commercial nodes on adjacent main streets, which are not necessarily corridors - Garland and Grand, not Monroe or 29th.

3. **Intensity of the Nodes:** The biggest issue I see with Option 2 is its continued emphasis on corridor density without enough focus on truly walkable neighborhood nodes. F

   Walkability is about a walkable radius, not contiguous commercial intensity. For a district to be walkable, it has to have a concentration of desirable services, and residential intensity within ¼ mile to walk to those uses. If a grocery store is on one side of a long commercial corridor and the coffee shop is a mile away on the other side - the district is not walkable and adding residential intensity will not make it so.

   If the residential intensity within a ¼-mile of identified nodes is too low, retail will not pencil, and people will continue to drive. If that happens, projected VMT reductions may not materialize.

4. **SEPA Exemptions:** Once proper intensity and walkable nodes are identified, make them categorically exempt from SEPA. G

Once impacts are studied at the plan level, development within identified nodes and their walksheds should be streamlined. If a project meets adopted zoning and design standards, it should be able to proceed with minimal additional environmental review.

Extend SEPA exemptions into the ¼ mile walk shed to ensure the density required for node feasibility has a greater degree of development certainty.

G

The core point is simple - intensity must be paired with good urban form, sufficient walkshed density, and regulatory certainty if walkability is to become reality.

I

My family and many others like us have “boomeranged” back to Spokane because we love this place: the access to nature, the relative affordability, and the quality of life. But a consistent theme I hear is that we wish it were just a bit more walkable.

We don’t need to become Seattle. We want Spokane at its best. Neighborhoods where kids can bike to get ice cream, run a quick errand to the corner store, or meet friends without always relying on a car. That version of the good life is within reach, and this plan has the opportunity to help make it possible.

Thank you for your consideration.

Sincerely,

David Allen

From: Tyler Allen
To: Plan Spokane
Subject: SAVE OUR TREES
Date: Wednesday, February 18, 2026 4:08:37 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.

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Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2.4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection.

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air, and water, which is Imput birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections.

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city.

Sincerely,

Joshua Allen

E Empire Ave, 99207

This text was copied from the body of the email from Joshua Allen (tylerallen93@icloud.com). The original email appeared to be redacted/blacked out, however the text is legible after copying and pasting into a word document. -HS

Dear City Planning Committee,

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and environmental review exemptions currently under consideration. Our city's slogan is

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I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!

Sincerely,

Joshua Allen

E Empire Ave 99207

From: Andy Amidon
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 9:38:02 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

-Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits

A

-The City is considering expanded use of SEPA infill and housing exemptions. Given this approach, 350 Spokane urges the City to establish clear guardrails before broadly applying exemptions, including completing an inventory of existing urban natural assets - such as tree canopy, habitat value, and ecological connectivity

- to ensure that infill development does not result in unmitigated impacts to environmental resources within urban neighborhoods

B

- We oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 in the EIS, Shows all neighborhoods will be exempted from environmental review in two phases

- We Support environmental review exemption only if the proposed development area is 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces

C

From: Kirsten Angell
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 4:15:22 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

When looking at Alternatives 2 and 3 in the PlanSpokane 2046 Draft EIS, it is important to consider the number and types of additional housing units that are anticipated during Spokane's growth in the next 20 years. Several 2025 studies point to the fact that the city already has sufficient or surplus housing for all income types except 0-80% AMI. In that category, Spokane has a 4,400-unit shortage. In 80-120% AMI, there is a 6,000-unit excess. In 120% AMI there is a 9,000-unit excess. The only housing needed until 2046 is in the lower income categories. A

I strongly support infill as an important tool for providing much needed low-income/attainable housing while also avoiding the expansion of our Urban Growth Boundary (UGB). I support fast-tracking (waiving SEPA review) on urban lands that are already mostly impervious. However, what the City of Spokane is proposing, in my reading of the PlanSpokane Draft EIS and the Environmental Review Exemptions notice, is that environmental review will be waived for the bulk of the projected infill development destined for all of the affected neighborhoods. D F

Of the three choices, alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits. However, I cannot in good conscience support any of these alternatives without the City's assurance that they will establish clear guardrails before broadly applying exemptions. My recommendation is that you break this effort into two phases. The first phase would identify those properties that are already denuded and whose soils and surfaces are 100% impervious and fast-track these properties, even incentivize their development for low-income/attainable housing. The second phase would begin once the remaining areas (those offering ecologically and culturally valuable services) have been reviewed and mapped. The City urgently needs to identify and map Spokane's remaining green infrastructure and develop well-defined objectives, using a scientifically grounded rubric for the assessment of these areas based on criteria established to protect the ecological and climate resilience services they are already providing our community. It is commonly understood that green infrastructure provides critical services such as mitigating urban heat island effects, improving air quality, managing stormwater to reduce flash flooding as well as reducing energy demand and providing social, economic, and ecological co-benefits for public health. B C E

Language for identifying and protecting interconnected natural areas, open space and habitat corridors can be found in Spokane's guiding documents: specifically in the existing Natural Environment chapter of our Comprehensive Plan (NE 6.3 and 11.1). Additional language for protecting these places can be found in the Sustainability Action Plan. There is also language suggested in the Climate Resilience and Sustainability Board's climate resilience policy recommendations, which I wholeheartedly appreciate and support adoption of (LUZ 2-4). Waiving environmental review on new development won't align well with Section 12.02.905 of the Spokane Municipal Code. This goal is supported by the PLANT (Protecting Leaves and Adding New Trees) Ordinance, which focuses on increasing canopy coverage from the estimated 23% in 2019 to 30% by 2030. We are currently losing a large number of pine trees to drought and bark beetle infestation, so we will not be moving towards this target if the city doesn't provide due diligence to protect our remaining urban forest. F

I recommend that this language be added to our Comprehensive Plan, as suggested by the CRSB:
"Create and maintain an inventory of existing and potential natural lands and fish and wildlife habitat, evaluated for their ecological and climate resilience values, using Best Available Science. A Natural Area and Habitat Connectivity Network database in the city's Geographic Information System would disseminate the information for decision makers and the public in a usable, interactive format." G

The city has access to valuable data if collaborating with the state and taking advantage of information in the Washington Habitat Connectivity Action Plan (WAHCAP) which provides a data-driven, statewide framework to integrate wildlife movement and habitat connectivity into local, regional, and transportation planning. This plan helps planners move beyond just identifying critical areas to actively designing landscapes that accommodate ecological, climate, and development needs. H

I wholeheartedly recommend that the City Council place a moratorium on the removal of any significantly large patches of green infrastructure, until such time as our city has the capacity to map our local canopy and natural areas of value, including their potential connectivity to one another. Once an area has been identified for protection, the city can use tools such as ordinances, zoning restrictions, "open space" designation, incentives or acquisition to secure the land for the benefit of our present and future generations. Meanwhile, lands that are close to services, transportation corridors or have experienced disturbances and that are 100% impervious, should be fast-tracked for low-income/attainable housing. I

Additionally, I encourage our city's decision makers to avoid development on formerly active agricultural lands within and J

close to our Urban Growth Boundary. There should be a concentrated effort by our city leaders to protect these lands to increase the overall resilience of our community. Vinegar Flats and Five Mile prairie should NOT be considered for development and should receive a special zoning designation (Urban Agricultural Asset) and possibly other added protections and incentives, to encourage regenerative agricultural practices and support our growing local food economy.

J

Thank you for your consideration, Kirsten Angell

From:	Robert W Apple
To:	Plan Spokane
Subject:	GMA, follow requirements for any expected city growth in population though that alone is questionable for obvious and many reasons.
Date:	Thursday, March 5, 2026 3:38:58 PM

A

[CAUTION - EXTERNAL EMAIL - Verify Sender]

--
Sent from my Android phone with mail.com Mail. Please excuse my brevity.

From: Arksey, Meredith
To: Plan Spokane
Subject: Environmental review
Date: Tuesday, February 17, 2026 9:09:33 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Please choose Alternate 3.
Thank you,
Meredith Arksey
2211 N Hemlock
Spokane 99205
Sent from my iPhone

A

From: Jane Barry
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 1:54:00 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

To Whom It May Concern,

I agree with the following statements:

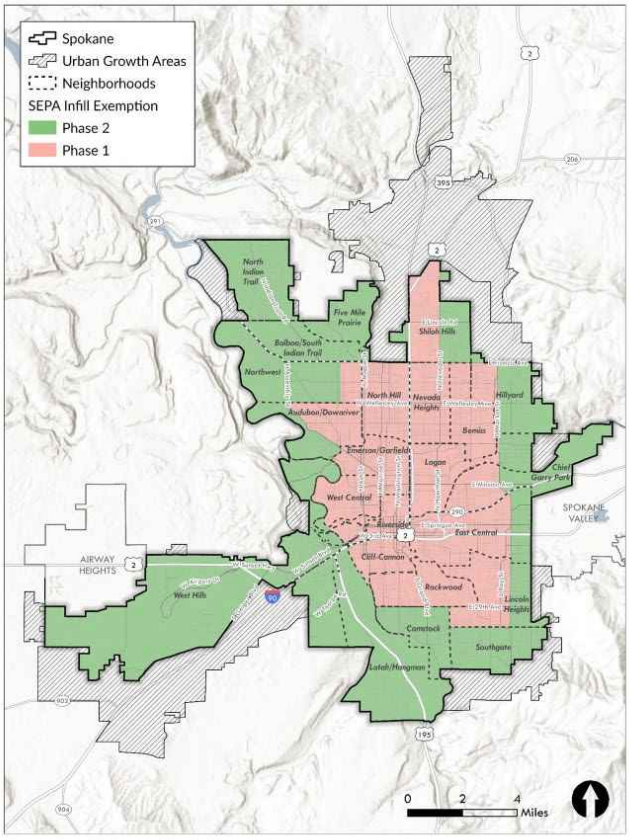
1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A
2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 (See photo). B
3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 (See photo) shows all neighborhoods will be exempted from environmental review in two phases. C
4. Suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3 (See photo). Existing Hard (Impervious) Surfaces included below.
5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

Sincerely,
Jane Barry

From: Jane Barry
To: Plan Spokane
Subject: Re: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 9:51:03 PM
Attachments: image001.png
image.png
image.png
image.png

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Exhibit 7: Phased SEPA Proposed Infill /Categorical Exemption Area



Source: City of Spokane, BERK, 2025.

Comment # 35

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

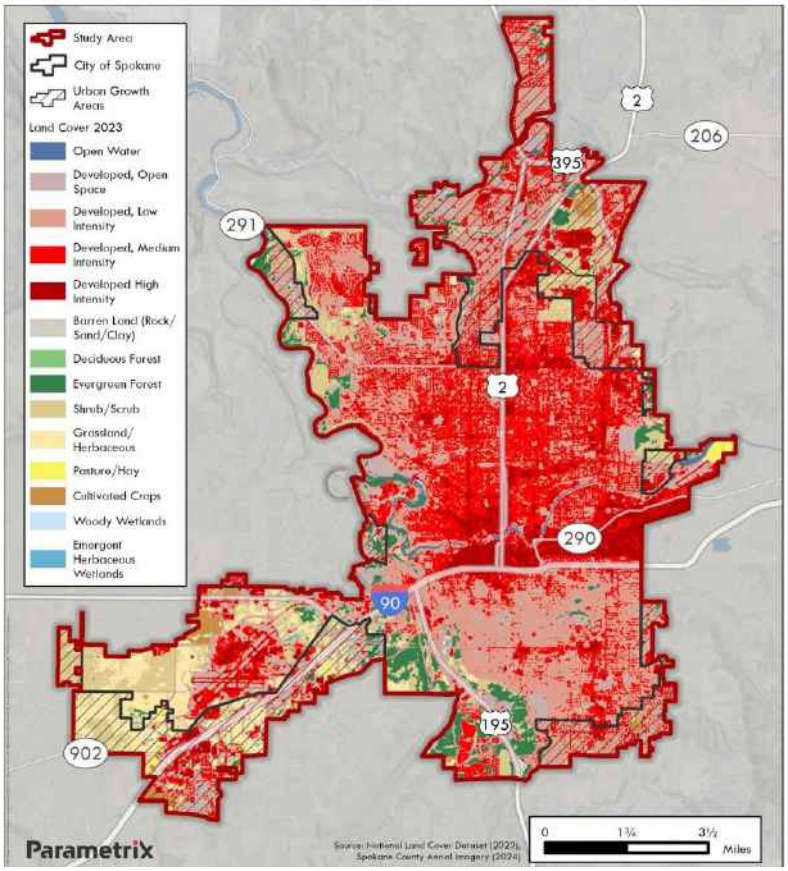
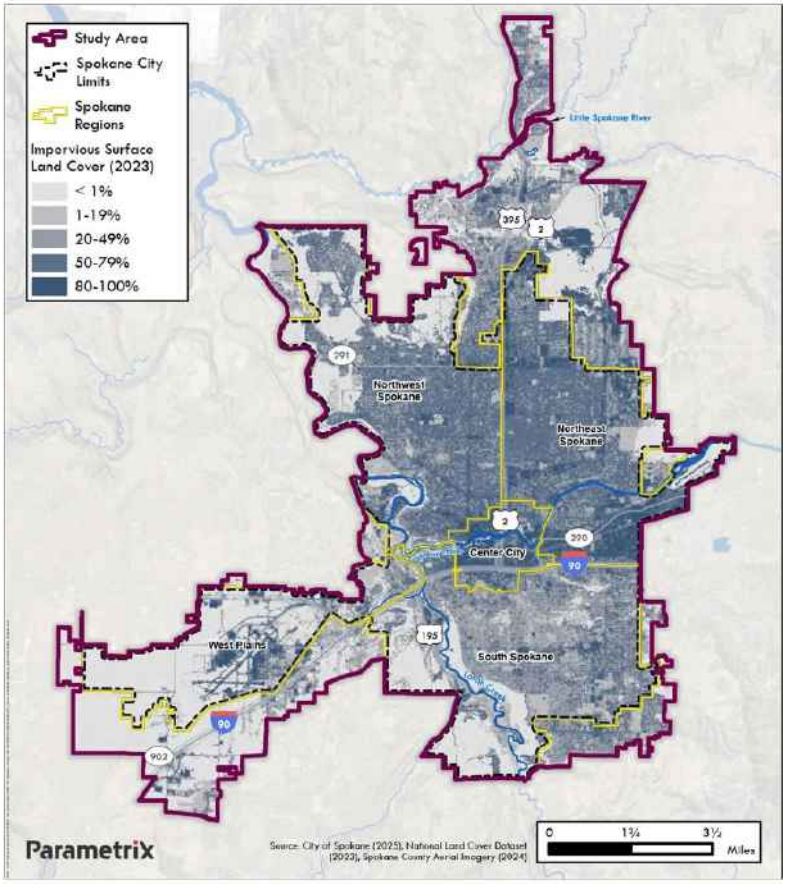


Exhibit 3.1-3. Existing Hard (Impervious) Surfaces



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

On Tue, Feb 17, 2026 at 4:06 PM Plan Spokane <eraplanspokane@spokanecity.org> wrote:

> Hello Jane,
>
> I am following up on your previous email with comments on the Draft Environmental Impact Statement (DEIS). I notice you referenced exhibits and/or photos in your comments, however no exhibits were included in your email. Please provide a copy of the referenced exhibits and/or photos if you would like them to be included as part of your comments on the DEIS document.
>
> Thank you,
>
> Hollis

From: Mari Bartoo Jacobson
To: Plan Spokane
Subject: Plan Spokane 2046 Draft EIS Comments
Date: Monday, February 23, 2026 11:27:43 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I would like to submit a few concerns for the record. It is important to me as a citizen of Spokane to see that our plan for the future consider these goals/priorities:

1. Support for Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc.
There are unprotected natural lands throughout the City. B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. All neighborhoods will be exempted from environmental review in two phases.
I suggest we support environmental review exemption only if 100% disturbed and impervious. C

4. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

Thank you for your consideration

Mari Bartoo Jacobson
4127 N Wall St.
503-287-0779

From: Sara Bauer
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 12:14:17 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.

To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!

Sincerely,
Sara Bauer

4121 N Post St,
North Hill Neighborhood Council

From: Thomas Bender
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, March 5, 2026 10:29:07 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Planning Commission:

The draft EIS does not project any increase in STA ridership over the next 20 years. The very purpose of an environmental impact statement is to bring attention to things that might harm the environment. It's assumed that population density will increase during the next 20 years and that exhaust from the additional automobiles associated with added population would harm the environment. One way to mitigate this effect is to encourage more use of public transportation. The EIS statement MUST call for a plan to encourage more use of public transportation and project an increase in STA ridership as a result. What's wrong with a little positive spin on things? A

Also: There is a typo in your instructions for what to put in the subject line to send in comments today (2056 vs 2046, pretty sloppy).

Thanks,
Thomas J Bender
Long-time Resident of the Minnehaha Neighborhood

From: Jeff Benefield
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 4:27:01 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Good day,
My name is Jeff Benefield and I reside in the 99203 zip code. I am a born and raised Spokanite and have lived here over 60 years and greatly enjoy the natural lands and wildlife habitat I find in and around Spokane. I wish to express my support for environmental reviews for further development within all parts of the city, and not have these reviews eliminated. Please refer to the following talking points:

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, and wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support for an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City. B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. C

4. Support environmental review exemption only if 100% disturbed and impervious.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

Thank you very much for your attention to these issues.

Sincerely,
Jeff Benefield

From: Marcella Bennett
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, January 14, 2026 11:27:13 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

A requirement for everyone making decisions on this plan should be a comprehensive tour of the 48 unit building complex on Five Mile road and Audubon in the middle of an established neighborhood and will be using a neighborhood street which goes by a neighborhood pool to exit those residents onto Five Mile. Yes, the Spokane City Planning Department approved this dangerous monstrosity over the objections of the Five Mile community and the City Council did nothing to stop it! Please protect our neighborhoods! Thank you. Blaine and Marcella Bennett
Sent from my iPhone

A

From: tom benemann
To: Plan Spokane
Subject: EIS Draft
Date: Tuesday, February 17, 2026 9:08:19 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City

I strongly recommend the City adopt Alternative 3 as the preferred growth alternative in the draft of the EIS. Our environmental plans were well-conceived, debated, and adopted. I believe we are intelligent enough to approve suitable development without compromising environmental protection. Thank you. A

Tom Bienemann
4318 N Walnut St, Spokane, WA 99205

From: Mary Bishop
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 1:03:06 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I believe that our natural resources, even in city limits, need to be protected for future generations. It's research based that an urban tree canopy promotes wellness physically and emotionally. Also, trees help hold on to rainwater to help our watersheds. A tree canopy cools in the summer and blocks harsh winds in the winter. Also, natural areas provide vital habitat for beneficial insects. That's why an inventory must be done before the resources are disrupted. Action without knowledge is ignorance we can no longer afford. We must preserve our natural resources for ALL ethnic groups to promote equity.

This is why I support the following:

1. I Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. I Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City. B

3. I heartily Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. All neighborhoods will be exempted from environmental review in two phases. C

Neglect by our city leadership is not honoring their fiduciary responsibility. We haven't just inherited the earth from our ancestors, we are borrowing from our children. What kind of world do we want for future generations?

Peace to you all
Mary Bishop, MEd
Certified Permaculture Design Consultant
Email: allthingsregenerative@gmail.com
Cell: +1(509)263-0662
linktr.ee

From: Carma Blalock
To: Plan Spokane
Subject: Plan Spokane 2046 draft EIS comments
Date: Wednesday, February 18, 2026 1:37:23 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

We need to keep our natural areas and tree canopy of 30% in Spokane. Money should be going towards urban forestry, plant health, tree planting and tree care, not towards urban sprawl. A

Sincerely
Carma Blalock
1828 West Augusta avenue
Spokane WA

From: Sommer Blessing
To: Plan Spokane
Subject: Regarding the environment
Date: Wednesday, February 18, 2026 1:21:06 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

This email is to express my concern and disappointment that the city what's to eliminate environmental review. You might as well just admit you do NOT care about the environment. If you don't care about the environment then you don't care about people. You only care about money.

Please take the following into consideration:

Spokane aims for a 30% tree canopy and needs better protections for natural lands. We should create an inventory of trees and wildlife habitats to support this. A

We need strong rules to protect important natural areas, trees, and clean water. Many natural lands in Spokane are currently unprotected. B

We should not exempt all neighborhoods from environmental reviews, as it would harm wetlands, forests, and wildlife habitats. C

Exemptions should only apply to areas that are fully disturbed and not natural, as noted in the Draft

We need to protect and maintain urban forests and natural areas to combat climate change and enhance community resilience. A

~Sommer Blessing

From: arcticjewelz@icloud.com
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 1:27:19 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Julie & LaVerne Boardman
& Charles G. Hopson
1005 S. Basalt St
Spokane, Wa 99224
West Plains/ Indian Canyon/Palisades Park
Sent from my iPhone

From: Kristel Bowden
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Thursday, February 19, 2026 6:16:34 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:
Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A
Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B
Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C
Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.
Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D
If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. A
I look forward to your response and to seeing these protections reflected in the upcoming plans for our city! C
Sincerely,
Kristel Bowden
5709 N. Bemis St., Spokane, WA 99205, Dwight Merkle Neighborbood.
Please email for further correspondence.

Author
Stefani VanDeest
https://my.spokanecity.org/planspokane/draft-eis/



MY.SPOKANECITY.ORG
Draft Environmental Impact Statement

1d

Casey Carey Kemnitz-Ruthenbeck
Done. Thank you for bringing this to my attention. I get so overwhelmed with the state of the entire nation that I forget to keep my eye on local activity.

1d

Stevie McGuire
Thank you for posting this and making it easy! I got my email in!

1d

Kirsten Angell
This is super helpful. Thanks for making it easy for me. I want to protect our trees and special natural areas.
I will do it!

1d

Julia Carr
done!

1d

Liva Nayeli
Done! Thank you, Stefani, for the time and dedication you put into this.

1d

Carlee Hieb
Done! And shared.

1d

Aiko Terao
Got my email in. Thank you for posting.

1d

Darla Greene Bean
Done!

10h

Chantelle Monique Flint
Thank you Stefani!

1d

From: Dee Boyle
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 5:04:25 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 below. B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 below shows all neighborhoods will be exempted from environmental review in two phases. C

4. Suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces included below.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships. D

Dee Boyle
Defind | Founder
(509) 438-7308

From: Mike Boyle
To: [redacted]
Subject: Comment - Impact Statement
Date: Wednesday, February 26, 2020 2:20:40 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

My name is Mike Boyle. I live at 732 S. Green by Underhill Park in Spokane.
I have seen why the Spokane county ref has created a compact statement that is currently in place. I can tell you firsthand what a lack of enforcement of an environmental impact can have on an area. I've attached a photo of a project that is just up the hill from me by Underhill Park. This is what a lack of management and Enforcement can have happen in an area.
The area where you see the house was a beautiful forest that was completely gutted. I would strongly urge the mayor and the city Council could please keep the Enforcement that you have in place and more importantly start enforcing them on a regular basis.
Thank you.



Sent from my iPhone

A

From: Gene Brake
To: Plan Spokane
Cc: Klitzke, Kitty; Zappone, Zack
Subject: Save our Neighborhoods: No Environmental Review Exemption
Date: Wednesday, February 18, 2026 8:07:24 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I urge the planning department to rethink the plan to make it even easier to bulldoze our neighborhoods. Our neighborhoods are the lifeblood of our city and we must protect the environment as we grow our city. I vehemently oppose the blanket exemption to environmental review.

These are vital issues in my opinion:

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A
2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 (See photo). B
3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 (See photo) shows all neighborhoods will be exempted from environmental review in two phases. C
4. Suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3 (See photo). Existing Hard (Impervious) Surfaces included below.
5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

Gene Brake
Corbin Park Homeowners Association
Emerson Garfield Neighborhood Council

From: Ciera Breithaupt
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 4:36:08 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

This email is intended to support the protection of natural lands and wildlife habitat in the PlanSpokane 2046 Draft Environmental Impact Statement (EIS).

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 (See photo) shows all neighborhoods will be exempted from environmental review in two phases. C

4. Support environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3 (See photo). Existing Hard (Impervious) Surfaces included below.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

Please take consideration to keep our city green and a friendly habitat to our climate,
Ciera Breithaupt

Get Outlook for iOS

From: Kerry Brooks
To: Plan Spokane
Subject: Comments on DEIS
Date: Wednesday, February 18, 2026 4:06:31 PM
Attachments: Comments_Spokane_2046_DEIS_KBrooks.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Please find attached comments on the Draft EIS for the Spokane Comprehensive Plan update.

Thank you.

_____

Kerry Brooks
dkbb1@msn.com
509.475.8881

To: Tirrell Black, City of Spokane Planning Services, PlanSpokane@spokanecity.org

Subject: Comments on City of Spokane Comprehensive Plan Update 2026-2046 Draft EIS

From: Kerry R Brooks PhD, Spokane WA, West Central.

My comments focus on several sections of the DEIS Chapter Three. Thank you.

3.1. Earth, Water Quality, Water Resources

P 3-3 Terrain discusses slopes. Exhibit 3.1 merely depicts elevation with no representation of slopes. This should be corrected. A

P 3-6. Soils and infiltration. Text mentions mismatch between representation of soils as having high/moderate infiltration but shallow bedrock. How is this problem mitigated in the plan alternatives that focus growth on the West Plains? B

P 3-14. Floodplains. Have the plan alternatives incorporated the limitations and FEMA recommendations described in the text into their land allocations? C

P 3-15. Exhibit 3.1-7, Surface Waters does not depict all the intermittent waters shown in the current *National Hydrography Dataset Plus High Resolution* dataset (See ArcGIS Online, e.g.). Please correct this omission -- If they are not identified in this EIS they cannot be protected, especially in reference to the effort to have this EIS serve as sufficient to support categorical environmental review exemptions. Perhaps add language to the mitigation discussion requiring identifying and preserving intermittent water bodies. D

PP 3-25 – 3-28. Existing and forecast Hard Surfaces / Development Density. Please add explanation of the methods applied to develop the Housing Unit Growth Forecasts. Is the large increase in housing units forecast in areas such as Hangman supported with respect to preservation of critical areas (especially habitat and "Natural Open Space" (SMC 17E.020.030.B.12)) serving as wildlife corridors, as well as water quality and quantity and available infrastructure? E

3.3. Plants and Animals

PP 3-57 – 3-35. Provide full definitions of the Land Cover categories depicted to Table 3-3-2 and Exhibit 3.3.3. Particularly, the Developed Land Cover categories are defined by percentage of open space vs developed space, which is important in articulating impacts to natural vs impervious surfaces under the various alternatives. This is also important in developing a full representation of "Natural Open Space." F

> An example: Class 22: *Developed, Low Intensity- areas with a mixture of constructed materials and vegetation. Impervious surfaces account for 20% to 49% percent of total cover. These areas most commonly include single-family housing units* (https://www.mrlc.gov/data/legends/national-land-cover-database-class-legend-and-description).

Additionally, the National Landcover database includes a "Percent Canopy" dataset which is also useful in articulating and representing built vs. natural form and understanding landscape (corridor) connectivity. These datasets can help identify the 'small patches" of habitat described in the text (c.f. 3-64), which together constitute more fine grained habitat connectivity that is common in urban environments. G

In 2025 the Washington Department of Fish and Wildlife completed and finalized the Washington Habitat Connectivity Action Plan (WAHCAP, https://wdfw.wa.gov/species-habitats/habitat-recovery/connectivity/action-plan) . This product represents current Best Available Science. While primarily focused on statewide habitat connectivity priorities, it developed datasets useful on a regional scale. The WAHCAP did not cover large urban areas, including Spokane. However, the WAHCAP plan recommends that urban areas conduct fine-grained habitat and connectivity work. The plan provides recommendations for including connectivity and land use policy and planning (see WAHCAP pp 72-26). H

WAHCAP also provides constructive examples of how urban areas developed habitat and connectivity data, maps and recommendations. Considering that corridors are Critical Areas this work must be done in Spokane prior to finalization of the revised land use map and any land use designations. Completing this work with supporting implementation regulations can result in a dataset that guides appropriate development and intensification while fostering connectivity and limiting fragmentation. Perhaps even restoring lost connectivity and habitats. Such restoration of habitats (trees and understory) should focus on areas of the City that lack them. That work would coincide with environmental justice and consideration of climate impacts on overburdened communities. I

Discussion of Plant and Animal Impacts (3.3.2 and Mitigation 3.3.3).

Impacts. The discussion as written does not demonstrate how any of the alternatives prevent "no net loss of habitat values and functions" (WAC 365-196-830 Protection of critical areas). Please correct this omission. J

Additionally, WAC 365-196-335, Identification of open space corridors requires cities and counties to identify open space corridors. Specifically:

(a) Each county or city planning under the act must identify open space corridors within and between urban growth areas. They must include lands useful for recreation, wildlife habitat, trails, and connection of critical areas as defined in RCW 36.70A.030 (WAC 365-196-335(1)b).

Finally, the Washington Department of Commerce Guidelines for developing HB 1181 Comprehensive Plan Climate contain three main requirements. Relevant to this discussion is requirement #2: K

> *Requirement 2: Identify, protect, and enhance natural areas to foster climate resilience, as well as areas of vital habitat for safe species migration;* (DOC *Guidance*, page 16, https://www.commerce.wa.gov/growth-management/climate-planning/climate-planning-guidance/)

The land use plan alternatives and the preferred alternative must address these requirements.

Mitigation. The DEIS states that no 'additional' mitigation measures are necessary. However, it is not clear that the DEIS (and alternatives) address the requirements outlined immediately above. The final EIS must fully address them. L

From: erinabbott2000
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 7:18:11 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,

Erin Brower

314 E Wabash Ave Spokane WA 99207

From: Edward Bruya
To: Plan Spokane
Subject: PlanSpokane 2056 Draft EIS Comments
Date: Thursday, March 5, 2026 10:53:34 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Version 2
Ed Bruya

A

From: Melissa Burchell
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 3:58:21 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Please note that, as a long-time resident of this community, a concerned citizen, and 26-yr employee of the Spokane County Stormwater Utility/Environmental Programs groups, I absolutely oppose the changes proposed in the draft EIS that is being considered. Please do not join the County in allowing developers and others to run ruff shod over important environmental codes and regulations! We must do everything we can to preserve our natural resources and enforce current environmental protections. A

Respectfully,
Melissa A. Burchell
4118 N Adams St
Spokane, WA 99205

From: Sarah Burroughs
To: Plan Spokane
Date: Wednesday, February 18, 2026 11:30:57 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
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If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Sarah of Moran Praire 99223

From: julia carr
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 10:23:06 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
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If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Julia Carr

Comment # 57

PlanSpokane
Have a comment? Tell us!

Comment Card
Have a question? Ask away!

Name: LINDA CARROLL Contact: lindalouise701@yahoo.com

1) What means does the city have with owners of empty lots to build multi-family dwellings? Leverage on corridors

2) If those empty lots in corridors remain empty that will put pressure on homeowners in the ½ mile to sell. The homes will be demolished and replaced by rentals, result in fewer homes & homeowners. What means does the city have to minimize that?

3) The Neighborhood Councils or Community Assembly are the bodies that the City Charter constitutes for residents to express their views. What role do they have in the selection of the preferred alternative?

4) With all the inclusion of transit why does the EIS have the same ~~#~~ of travel miles of 2026 for 2046?

5) What restrictions on the neighborhood as a whole does the designation of historical register have?

6) Why does pollution from transit figure so little in an Environmental Impact Study Statement?

Mail this card (postage required) or email your questions and comments to **planspokane@spokanecity.org**

Continued Comments

Do not write/erase this line.

Postage Required

To:

City of Spokane
Planning & Economic Development
808 W Spokane Falls Blvd
Spokane, WA 99201

A

B

C

D

E

From: Kathryn D Chitwood
To: Plan Spokane
Cc: tcr@sec.gov; mike.jensen@wsu.edu; t.watson@futuraenergygroup.com; fraud@sao.wa.gov; gillisj@sao.wa.gov; execadmin@pocfd2.org; Hoeper, Erin (SAO); hotline@sao.wa.gov; Shane Stocking; sheriff@pendoreille.org; esgeneral@lni.wa.gov; fire@pocld.org; sheriff@stevenscountywa.gov; jeana.gillis@sao.wa.gov; sheriffadmin@stevenscountywa.gov; erin.anderson@sao.wa.gov; excessdisposal@gmail.com; Fraud; gblakeslee@pendoreille.org; hlo.info@dhsoha.state.or.us; frontdesk@hum.wa.gov; dfi@dfi.wa.gov; drick@popud.org; cjones@popud.org; erika.beresovoy@ecy.wa.gov; Risk-Claims@wcrp.wa.gov; Don Hawpe Superintendent; rosenm@cbsnews.com; lnicontact@lni.wa.gov; Jackson, Sterling (DFW); twhitney@popud.org; Todd Strobel; cknapp@popud.org; tshanholtzer@merklestandard.com; townbey@pendoreille.gov; tmoody@popud.org; Jason Lyon Cusick School Board; fraud@popud.org; Madelaine Groom; press.office@cern.ch
Subject: PlanSpokane 2046 Draft EIS Comments – Notice of Administrative Erasure Risks
Date: Tuesday, February 17, 2026 1:51:41 PM
Attachments: Structural Integration of Circulation Economics in Retail_ A Professional Build-Out Proposal for Safeway Newport and the Making Smiles Happen Ark Pilot.docx
Forensic Audit of the Pend Oreille Rupture_ Dismantling the Dunn-Wilks Extraction Logic through the Sovereign Ark Protocol.docx
The Sovereign Ark and MSH Protocol_ A Macro-Strategic Framework for Industrial Circulation and Regional Solvency.docx

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

To the City of Spokane Planning Department,

My name is Kathryn Chitwood, and I am writing to formally submit comments on the PlanSpokane 2046 Draft Environmental Impact Statement (EIS). As a forensic auditor currently investigating "Infrastructure Necrosis" and fiduciary failure in neighboring Pend Oreille County, I am sounding an urgent alarm regarding the City's proposal to eliminate Environmental Reviews for developments.

1. Oppose Blanket Environmental Review Exemptions: A
The proposal to exempt all neighborhoods from environmental review (Exhibits 7 and 3.3-3) is a move toward "Extraction Logic"—a model that prioritizes rapid throughput over the "Biological Sovereignty" of our city. In Pend Oreille, we have seen how "Administrative Erasure"—the removal of oversight and the silencing of safety warnings—leads to physical grid failure and municipal water collapse. Spokane must not follow this path.

2. Inventory as the Sovereign Ledger: B
You cannot manage what you do not measure. I support a full inventory of trees, natural lands, and wildlife habitats. Without an audit-grade ledger of these assets, the city is operating with "Thermodynamic Debt," liquidating natural cooling and flood protection for short-term density gains.

3. Enforceable Critical Areas Ordinance: C
Spokane requires a Critical Areas Ordinance with "teeth" to protect water quality and riparian areas. Environmental review is the only "Glass Box" mechanism that ensures developers do not treat our neighborhoods as uncollateralized sinks for private profit.

4. Climate Resilience & Sustainability: D
I support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4. Natural systems must be viewed as "Interconnected Infrastructure," not optional aesthetics.

Do not allow the future of Spokane to be written through the erasure of environmental accountability. Physics is the ultimate ledger, and the physical degradation of our canopy A

cannot be "zeroed out" by administrative silence.

Sincerely,

Kathryn Chitwood/ Forensic Auditor | Sovereign Ark Protocol (458-245-7796)

Part 2: The "Pend Oreille Rupture" Explanation

Use this text to explain your situation to the State Auditor, law enforcement, or the public.

Subject: Summary of Forensic Audit – Systemic Extraction & Administrative Falsification at Pend Oreille PUD

The Situation: Pend Oreille County is currently the site of a "Macro-Stall"—a terminal inflection point where aging public infrastructure is being cannibalized by high-density compute loads (100MW+). My forensic audit has uncovered a state of **Infrastructure Necrosis**, evidenced by the repeated failure of the Cusick water system and the **"Harmonic Flaying"** of a 1964 legacy utility transformer.

The "Cusick Silence" & Administrative Erasure: Despite flagging a **$3.4M Bond Deficiency** and systemic safety violations (NFPA 70E / RCW 19.28), the Pend Oreille PUD Board of Commissioners has engaged in **Administrative Erasure**.

- **Falsification of Records:** The "Approved" January 20, 2026 meeting minutes were scrubbed of my safety warnings and mentions of the **RICO (Racketeer Influenced and Corrupt Organizations)** investigation (SEC TCR #17681-703-081-801).
- **Obstruction:** I have issued a formal notice of intent to seek criminal charges against **Karen Willner (Clerk of the Board)** for Obstruction of Justice and tampering with a public record (RCW 40.16.010).

The "Great Inversion" Solution: My proposal, the **Sovereign Ark Protocol**, mandates a transition to **Circulation Economics**:

1. **Liquid Immersion Cooling:** To eliminate "Induced Seismicity" threatening the Ione Tunnel.
2. **90% Heat Recovery:** Reclassifying waste heat (130°F–150°F) as a public asset to restore municipal water and local agriculture.
3. **Immutable Ledger:** Using cryptographic auditing to end the "Email Gap" and ensure community restitution.

The Current Threat: The Board recently dismissed these forensic findings, choosing instead to laugh and pivot to "pay-as-you-go" meters—a tactic designed to shift the cost of grid flaying onto the vulnerable residents of Cusick while shielding extractive industrial tenants.

Physics is the Ledger. The heat signatures are visible, the bond gap is documented, and the coordinated surveillance from military and broadcast sectors confirms that this is a matter of

National Security. These professionals and experts are following my reporting because the government officials in my county are breaking federal laws, on the record. They need to be impeached if they aren't going to fulfill their fiduciary duty to the ratepayers of this county.

Sincerely,

Kathryn

The Sovereign Ark and MSH Protocol: A Macro-Strategic Framework for Industrial Circulation and Regional Solvency

The contemporary management of industrial infrastructure and public utility assets in the Pacific Northwest has arrived at a terminal inflection point. This crisis is necessitated by the convergence of aging physical systems and the unprecedented metabolic demands of the global high-density compute market. The analysis of this landscape reveals a pattern of systemic extraction that has transitioned the region from a living, regenerative state into a stagnant condition characterized by administrative erasure and infrastructure necrosis. The restoration of regional solvency depends upon the implementation of the "Great Inversion," a mandatory transition from extractive industrial logic to the "Sovereign Ark" and the Making Smiles Happen (MSH) Protocol.

High-Density Compute and Energy: Transitioning from Extraction to Circularity

The high-density compute sector, represented by organizations such as CleanSpark and the AI engineering community, serves as the primary driver of modern energy consumption. However, the current trajectory of "Extraction Logic"—a model wherein massive energy loads are processed with minimal community circulation—has induced a state of thermodynamic debt that threatens the structural integrity of the regional grid.

The Physics of Square Wave Consumption and Harmonic Flaying

Modern high-density compute loads, particularly those associated with digital asset mining and large-scale AI training, differ fundamentally from the linear loads of the mid-twentieth century. Hardware utilized at flagship nodes, such as the Merkle Standard facility at Usk, employs Pulse Width Modulation (PWM) to create high-frequency AC waveforms. These "Square Wave" consumption patterns induce extreme mechanical and thermal stress on transformer windings, a phenomenon described as "harmonic flaying". This distortion acts as a systemic contaminant, degrading the pure sine wave required for stable domestic and municipal use.

The thermodynamic debt is quantified by the accumulation of heat (Q_{load}) that exceeds the dissipation capacity ($Q_{cooling}$) of legacy systems:

$$Debt_{thermal} = \int_{t_1}^{t_2} (Q_{load} - Q_{cooling}) dt$$

When this debt accumulates, as seen in the 1964 utility transformer serving the Usk node, the system enters a state of necrosis. The "Cusick Silence," characterized by the January 2024 pipe bursts and subsequent decline in well production, represents a literal breakdown of the regional water-energy nexus.

The Arrhenius Model and Mandating Immersion Cooling

The rate of physical decay in electrical infrastructure is governed by the Arrhenius Model, which describes the temperature dependence of reaction rates in electrical insulation. Modest temperature increases significantly reduce the lifespan of critical components, necessitating a transition to more efficient cooling technologies.

Temperature Variable	Rate of Reaction (Deterioration)	Remaining Life Expectancy	Infrastructure Result
Rated Temperature (T_0)	1.0	100%	Stable operation
$+10^\circ\text{C}$ Rise	2.0	50%	Halved insulation life
$+20^\circ\text{C}$ Rise	4.0	25%	Rapid harmonic flaying
$+30^\circ\text{C}$ Rise	8.0	12.5%	Total systemic necrosis

The Sovereign Ark protocol mandates a transition to immersion cooling as a prerequisite for grid interconnection. By submerging hardware in dielectric fluid, the Public Utility District (PUD) can achieve a Power Usage Effectiveness (PUE) of 1.03 to 1.05, significantly lower than the industry average of 1.5. This transition eliminates the low-frequency harmonic vibrations from air-cooling systems that contribute to "Induced Seismicity," a phenomenon that threatens the structural integrity of geological substrates such as the Ione Tunnel.

CleanSpark’s implementation of immersion technology has demonstrated a 20% increase in mining efficiency and an 80% reduction in e-waste by extending the life of hardware. For the PUD, mandating 90% heat recovery allows for the capture of 94 million BTUs/hr of high-grade thermal energy ($130^\circ\text{F}–150^\circ\text{F}$), which can be utilized for municipal restoration through "Thermal Arbitrage".

Aviation and Aerospace Manufacturing: The Dignity Asset Model

The aviation and aerospace manufacturing sector, particularly in maritime-industrial hubs like Seattle and Aberdeen, is currently facing a "Hollow Utility" crisis. This condition is marked by "Administrative Necrosis"—the accumulation of supply chain surplus and unbooked capacity that acts as a thermodynamic sink for regional wealth.

Converting Supply Chain Surplus into Sovereign Credits

The Sovereign Ark model proposes a "Dignity Asset" framework to reanimate this stagnant capital. In this paradigm, supply chain surplus and over-capacity are converted into "Sovereign Local Infrastructure Credits" using the MSH immutable ledger. This transition moves beyond the "take-make-waste" flow that has historically defined the sector.

The Making Smiles Happen (MSH) Protocol serves as the operational layer for this conversion, utilizing the Universal Inventory Interchange (UII). The UII is an open standard designed to allow AI clients and autonomous systems to transact directly with commerce stacks. By identifying surplus inventory in aerospace manufacturing and matching it with local infrastructure needs, the MSH ledger creates a "Glass Box" transparency that replaces the traditional "Black Box" of extractive accounting.

Operational Feature	Extraction Logic (Legacy)	Sovereign Ark (Circulation)
Inventory Accounting	Static assets / Write-off events	Dynamic assets / UII matching
Capacity Utilization	Unbooked "Administrative Necrosis"	Sovereign Local Infrastructure Credits
Transparency	"Black Box" opacity	"Glass Box" SHA-256 audit
Regional Impact	Liquidation of local value	Restitution of community assets

Reclaiming the Sovereign Skeleton of the Land

The legal architecture for this transition is rooted in the precision of the Public Land Survey System (PLSS). A forensic reconstruction of the 1891 Stahl & Tidmarsh First Addition to Wenatchee demonstrates the foundational rigor required for sovereign land management. By tracing the "Root of Title" from original federal land patents to current parcel IDs, the region can reclaim public ownership of infrastructure corridors, ensuring that the wealth generated by aerospace manufacturing is anchored to the physical reality of the land.

Higher Education and Professional Training: The Generosity Engine

Higher education institutions, including Whitworth, Gonzaga, and UCLA, are uniquely positioned to serve as the catalysts for a "Skill-Sovereignty" matrix. The Sovereign Ark proposes a curriculum-integrated "Generosity Engine" that utilizes the MSH Protocol to fund top-tier clinical training through the liquidation of underutilized commercial assets.

Liquidating Underutilized Commercial Assets

The MSH Foundation’s "Smile Stays" program targets the "Administrative Necrosis" of the hospitality sector, specifically unbooked hotel room and accommodation blocks. These assets, which often represent a total fiscal loss for the provider, are liquidated through a digital protocol that transforms them into tax-deductible donations.

The Generosity Engine acts as the missing link between hospitality and healthcare. By copy-pasting a digital widget onto commercial websites, the MSH Protocol creates a 5-7 day window on immediately expiring rooms. These rooms are sold for a standardized fee (e.g., $100), with 100% of the proceeds funding free dental care and oral surgery scholarships.

Integrating Clinical Training into the Sovereignty Loop

This funding mechanism supports the creation of a self-sustaining clinical training system. By pairing 710 students with 710 professionals, the protocol creates "Smiles" while providing essential real-world experience. This "Generosity Engine" ensures that top-tier physicians have patients because the funding is structurally integrated into the commerce stack.

Program Component	Mechanism	Outcome
Resource Input	Unbooked hotel room blocks	Tax-deductible donation (IRS 170(e)(3))

Digital Protocol	MSH "Generosity Engine"	Liquidation of underutilized capacity
Institutional Support	Whitworth / Gonzaga / UCLA	Curriculum-integrated clinical training
Social Output	Free dental and healthcare services	Restored human agency and dignity

Public Utilities and Municipal Governance: Digital Shelters for Biological Sovereignty

The management of public utilities in Washington State is governed by a strict fiduciary duty of care, codified in the Code of Ethics for Municipal Officers (RCW 42.23). The "Infrastructure Necrosis" seen in Pend Oreille County necessitates a legal reclassification of industrial nodes as "Digital Shelters for Biological Sovereignty".

Legal Pathways under RCW 42.23 and 84.34

Under RCW 42.23.030, municipal officers are prohibited from being beneficially interested in any contract made under their supervision. The forensic audit of the PUD suggests that favoring extractive industrial loads while municipal systems in Cusick suffer from multi-year collapses may create a "Beneficial Interest" by granting "Special Exemptions" from resource stewardship.

The path to regional solvency requires reclassifying these industrial nodes as "Agricultural Farmland" under RCW 84.34. Washington law allows for the reclassification of land between "current use" categories without additional tax or interest penalties. This is physically realized through the Nexus Vail Atrium, a 10-acre greenhouse facility that utilizes the secondary heat exchange loop from immersion tanks to maintain a stable 70°F environment.

RCW Section	**Legal Mandate**	**Application to Utility Restoration**
42.23.070(1)	Prohibition of Special Privileges	Prevents favoring extraction over community grid stability

84.34.020	Farm and Agricultural Land	Allows reclassification based on commercial agricultural purpose
84.34.150	Change of Classification	Facilitates transition without tax penalties or interest
42.23.030	Interest in Contracts	Establishes fiduciary duty to prioritize public interest

Restoring failing Water and Sewer Systems via Thermal Arbitrage

The "Digital Shelter" concept transforms the compute node from a parasitic energy consumer into a symbiotic generator of biological life. By piping 130°F recovered heat into the Cusick water main system, the PUD can maintain the infrastructure above the freezing point, eliminating the freeze-thaw cycles that cause "Logistical Necrosis". The physics of this recovery is a direct application of the mass flow rate and specific heat transfer formula:

$$Q = \dot{m} \cdot c_p \cdot \Delta T$$
The restitution of community assets through this 94M BTU/hr loop transforms "Trauma Churn" into "Mathematical Performance," funding essential services and restoring regional solvency.

Financial Engineering: Tier 1 Capital and the Strategic Reserve

The Sovereign Ark does not require traditional capital calls. Instead, it utilizes the monetization of "perishable capital" through IRS Section 170(e)(3) enhanced deductions. By donating excess compute and thermal output to fund regional restoration, site operators achieve a 133% financial improvement over traditional liquidation.

Furthermore, by aligning infrastructure nodes with Executive Order 14233, "Establishment of the Strategic Bitcoin Reserve," the PUD can classify its assets as Tier 1 Capital. Treating digital assets as a national store of value comparable to "digital gold" attracts investment from private equity firms looking to close the $15 trillion global infrastructure gap, effectively insulating the PUD from financial risk.

Governance and the Skill-Sovereignty Matrix

The implementation of the Great Inversion depends on the leadership of the Pend Oreille PUD Commissioners, whose professional backgrounds provide a unique "Skill-Sovereignty" matrix.

These commissioners must act as "Fiduciary Trustees" to manage the "Trinitarian Crisis" of thermodynamic debt, revenue volatility, and administrative failure.

Commissioner	Background	Relevance to Sovereign Ark
Curtis J. Knapp	Psychology / Mortuary Science	Expertise in "Dignity Assets" and ethical stewardship
David W. Rick	Hydroelectric / Marine Engineering	Engineer of regional solvency and grid stabilization
J. Troy Moody	Construction / Small Business	Architect of the physical Ark and urban resilience

These leaders have the legislative authority under RCW 42.23 and RCW 84.34 to implement the Great Inversion and secure the future of the district.

Lead Investor's Mandatory Threshold for 2026

The forensic audit of the Pacific Northwest utility and industrial landscape issues a "Lead Investor's Mandatory Threshold" for all future operations at high-density compute nodes to ensure regional reconciliation and structural stability. These three non-negotiable standards define the requirements for grid interconnection and capital alignment in 2026.

1. Physical Grounding (Immersion)

All compute hardware must be fully submerged in dielectric immersion fluid and grounded via sacrificial anodes. This standard is required to eliminate "harmonic flaying" of transformers and mitigate "Induced Seismicity" that threatens transportation corridors like the Ione Tunnel. Immersion cooling ensures a PUE of 1.03 to 1.05 and extends the usable life of the hardware by up to 80%.

2. Auditable Capital (Immutable Ledger)

All financial and resource flows must be managed via the MSH Protocol’s immutable ledger. This ledger utilizes SHA-256 cryptographic hashing to eliminate the "Email Gap" and ensure "Glass Box" transparency for community restitution. The audit layer must provide an immutable record of every BTU of heat recovered and every unit of surplus inventory matched with community needs.

3. Circular Resource Dynamics (Heat Reuse)

All projects must achieve a minimum of 90% heat recovery for the purpose of municipal restoration and agricultural sovereignty. The captured thermal energy must be diverted into "Thermal Arbitrage" loops to maintain municipal water systems above freezing and power the Nexus Vail Atrium. Failure to implement this design is not merely a technical oversight; it is a breach of the fiduciary duty of care to the public interest.

The tools for reconciliation—legal, technical, and financial—are now present. The choice of design is the only remaining variable. The Sovereign Ark ensures that the dignity and biological assets of the people are caught by a design of safety, transforming extraction into circulation and securing the long-term solvency of the region.

Forensic Audit of the Pend Oreille Rupture: Dismantling the Dunn-Wilks Extraction Logic through the Sovereign Ark Protocol

The contemporary management of public utilities in the Pacific Northwest has arrived at a terminal inflection point, necessitated by the convergence of aging physical assets and the unprecedented metabolic demands of the global high-density compute market. This forensic audit examines the operational and legal status of the Pend Oreille Public Utility District (PUD), specifically the Merkle Standard flagship facility at the Usk node, through the lens of thermodynamic debt and sovereign reclamation. The analysis posits that the current trajectory of "Extraction Logic"—a model wherein massive energy loads are processed with minimal community circulation—has induced a state of Infrastructure Necrosis. This necrosis is manifested in the repeated failures of the water and sewer systems in the town of Cusick and the structural destabilization of the regional electrical grid. The restoration of regional solvency depends upon the implementation of the "Great Inversion," a mandatory transition from extractive industrial logic to the Sovereign Ark and the Making Smiles Happen (MSH) Protocol.

The Thermodynamic Debt of Cowboy Engineering

The physical crisis facing the Pend Oreille PUD is rooted in the "Thermodynamic Debt" of its primary 1964 utility transformer. Engineered for a linear era of electrical consumption, this legacy asset is now forced to accommodate the non-linear, high-density loads of the Merkle Standard node, which utilizes up to 100 megawatts of energy per year—an amount exceeding the consumption of all other PUD customers combined.

The Physics of Square Wave Consumption and Harmonic Flaying

Modern high-density compute loads differ fundamentally from the linear loads of the mid-twentieth century. Hardware utilized at the Usk node, including ASICs and digital mining arrays, employs Pulse Width Modulation (PWM) to create high-frequency AC waveforms. These "Square Wave" consumption patterns induce extreme mechanical and thermal stress on transformer windings, a phenomenon described as "harmonic flaying". This distortion acts as a systemic contaminant—the thermodynamic equivalent of "poop in the bath"—that degrades the pure sine wave required for stable domestic and municipal use.

The thermodynamic debt is quantified by the accumulation of heat (Q_{load}) that exceeds the dissipation capacity ($Q_{cooling}$) of the legacy oil system:

$$Debt_{thermal} = \int_{t_1}^{t_2} (Q_{load} - Q_{cooling}) dt$$

When this debt accumulates, the system enters a state of necrosis. This is evidenced by the "Cusick Silence," where the January 2024 pipe bursts at Cusick schools and the subsequent

decline in well production in Newport represent a literal breakdown of the regional water-energy nexus.

The Arrhenius Model and Quantifying Infrastructure Decay

The rate of physical decay in the PUD's infrastructure is governed by the Arrhenius Model, which describes the temperature dependence of reaction rates in electrical insulation. In power electronics and transformers, modest temperature increases significantly reduce the lifespan of critical components.

Temperature Variable	Rate of Reaction (Deterioration)	Remaining Life Expectancy	Infrastructure Result
Rated Temperature (T_0)	1.0	100%	Stable operation
$+10^\circ\text{C}$ Rise	2.0	50%	Halved insulation life
$+20^\circ\text{C}$ Rise	4.0	25%	Rapid harmonic flaying
$+30^\circ\text{C}$ Rise	8.0	12.5%	Total systemic necrosis

The "6-Degree Rule" dictates that every 6°C increase above the transformer's limit halves its insulation life. Under the "Cowboy Engineering" model currently employed at Usk, the persistent thermal stress and high-frequency vibrations from air-cooling fans lead to pitting and delamination of pipes and water pumps through "Blue Moon" shocks—grounding failures that flay copper wires and lead to hydraulic failure.

Induced Seismicity and the Ione Tunnel Threat

The air-cooling systems used for 500MW compute loads generate low-frequency harmonic vibrations that contribute to "Induced Seismicity". This phenomenon alters the stress field of the geological substrate. In Pend Oreille County, these vibrations pose a quantifiable threat to the structural integrity of the Ione Tunnel.

Research into mining-induced seismicity and fluid injection indicates that even small variations in ground shaking can lead to tunnel slippage in alluvial formations. The constant, low-level seismic load from thousands of high-wattage fans can compromise the "key stratum" of the surrounding rock.

Cooling Method	Thermodynamic Profile	Seismic Impact	Structural Risk
Air-Cooling	Low-grade waste heat (85°F)	High harmonic vibration	Ione Tunnel destabilization
Immersion Cooling	High-grade recovered heat (130°F+)	Near-zero vibration	Geological stabilization

The Sovereign Requirement mandates a transition to immersion cooling. By submerging hardware in dielectric fluid, the PUD can dampen these vibrations and achieve a Power Usage Effectiveness (PUE) of 1.03 to 1.05, significantly lower than the industry average of 1.5.

The Oil Kingmakers: Dunn, Wilks, and the Theology of Extraction

The systemic necrosis in Pend Oreille is a direct consequence of the "Extraction Logic" favored by West Texas billionaires Tim Dunn and Farris Wilks. While their primary influence is rooted in the Texas oil industry—through firms like CrownQuest Operating and Frac Tech—their political machine has established a paradigm of "Theological Trusteeship" that prioritizes centralized ideological gain over localized circulation economics.

The Dark Money Mechanism

Dunn and Wilks have poured more than $100 million into a constellation of PACs, such as Defend Texas Liberty and Texans United for a Conservative Majority, to push state politics toward a hardline, right-wing vision. This strategy relies on "vows for vengeance" against moderate officials and the funding of candidates who promote the privatization of public infrastructure, including schools and utilities.

In the context of the Merkle Standard node, this extraction logic manifests as the prioritization of high-density compute revenue over the stabilization of the community grid. Merkle Standard, a subsidiary of Allrise Capital, acquired the Usk site for $18.1 million in 2020 after the Ponderay Newsprint Company went bankrupt. While the site has permission to use up to 100MW, the

company has explored expansions up to 600MW—a scale that would cost the Bonneville Power Administration over $100 million in infrastructure upgrades.

Contrasting Trusteeship: RCW 42.23 and the Fiduciary Mandate

The "Theological Trusteeship" of Dunn and Wilks seeks to erode the distinction between church and state, treating public assets as instruments for a theocratic agenda. In contrast, the Pend Oreille PUD is legally bound by the Washington State Code of Ethics for Municipal Officers, codified in RCW 42.23.

Under RCW 42.23.030, municipal officers are prohibited from being beneficially interested, directly or indirectly, in any contract made under their supervision. The forensic audit of the PUD suggests that favoring extractive industrial loads while municipal infrastructure in Cusick suffers from multi-year collapses may create a "Beneficial Interest" by granting "Special Exemptions" from resource stewardship.

Entity	Ideological Framework	Legal Mandate	Regional Impact
Dunn-Wilks	Theological Trusteeship	Centralized ideological gain	Extraction/Liquidation
PUD Commissioners	Fiduciary Trusteeship	RCW 42.23 Public Interest	Circulation/Restoration

The "Fiduciary Trustee" role, assigned in this audit to Kathryn Chitwood, is required to manage the "Trinitarian Crisis": the global AI revenue gap ($650 billion), the thermodynamic debt of the 1964 transformer, and the "Administrative Erasure" of the community.

Legal Reclassification: Reclaiming the Root of Title

The path to regional solvency requires reclaiming the "Sovereign Skeleton" of the land through historical rigor and asset reclassification. The legal architecture of the Pend Oreille region is rooted in the precision of the late nineteenth-century Public Land Survey System (PLSS).

The Forensic Precedent of the 1891 Survey

The Stahl & Tidmarsh First Addition to Wenatchee, recorded in March 1891, serves as the primary case study for the transition from federal public domain to private urban and agricultural development. Located in Section 33, Township 23 North, Range 20 East of the Willamette

Meridian—the same coordinate framework as the Merkle site—this survey establishes the "Root of Title" for Section 33 assets.

Survey Element	1891 Specification	Significance for 2026 Reclassification
Coordinate Reference	Willamette Meridian	Establishes the "Root of Title" for Section 33 assets
Street Width	80 Feet	Standard for major thoroughfares/utility easements
Alley Width	20 Feet	Allows for waste removal and historical thermal loops
Dedication Status	Fee Simple	Confirms public ownership of infrastructure corridors

By utilizing the PLSS framework, the PUD can trace the chain of title from original Bureau of Land Management (BLM) General Land Office (GLO) patents to the current parcel IDs. This historical rigor is essential for reclassifying the land under RCW 84.34.

Asset Reclassification: Data Centers as Agricultural Farmland

The audit proposes the formal reclassification of industrial compute nodes at the Usk site as "Agricultural Farmland". Washington law allows for the reclassification of land between "current use" categories without additional tax or interest penalties under RCW 84.34.150.

The Merkle site can be reclassified as "Farm and Agricultural Land" if it meets the income and productivity criteria of RCW 84.34.020. This is physically realized through the Nexus Vail Atrium, a 10-acre greenhouse facility that utilizes the secondary heat exchange loop from immersion tanks to maintain a stable 70°F environment. The production of fresh fish, produce, and "Winter Fodder" for the Kalispel Tribe buffalo herd provides the necessary "commercial agricultural purpose" to satisfy assessor requirements. This reclassification unlocks strategic water rights and tax exemptions currently forfeited to external extraction.

Financial Inversion: The MSH Constructive Trust

The "Administrative Erasure" of Cusick—characterized by the systemic "Email Gap" and bureaucratic silence regarding infrastructure collapses—triggers the legal necessity for the MSH (Making Smiles Happen) Constructive Trust. In equity law, a Constructive Trust is an involuntary mechanism created by a court to prevent unjust enrichment from a breach of duty.

The Universal Inventory Interchange (UII) Protocol

The operational layer of this trust is the MSH Protocol, which utilizes the Universal Inventory Interchange (UII). The UII is an open standard designed to allow AI clients and autonomous systems to transact directly with commerce stacks via the Base44 SDK. It acts as a "Generosity Engine," using a SHA-256 cryptographic audit chain to ensure an immutable record of every asset moving through the system.

When Safeway Newport identifies surplus inventory—such as produce culls—the UII Protocol automatically calculates a "Generosity Score" and matches the resource with a community need. This "Glass Box" transparency replaces the "Black Box" transparency of extraction logic.

Thermal Arbitrage and the 94M BTU/hr Loop

The "Great Inversion" transforms the Merkle site’s thermal output from a liability into a "Sovereign Asset". The 94 million BTUs/hr of waste heat produced by the Usk node can be captured through immersion cooling.

Thermal Arbitrage provides the solution for Cusick's infrastructure necrosis by piping 130°F recovered heat into the municipal water main system. This eliminates the freeze-thaw cycles that cause pipe fatigue. The physics of this recovery is expressed by the mass flow rate and specific heat:

$$Q = \dot{m} \cdot c_p \cdot \Delta T$$
The 94 million BTUs of thermal energy recovered is diverted into the municipal system and the Nexus Vail Atrium, funding community services like dental care and restoring regional solvency.

The Political Rupture and Lead Investor's Threshold

The socio-technical collapse of the Pend Oreille region is a symptom of a larger thermodynamic statecraft that views populations as inventory. The conflict between centralized "Dark Money" and localized "Circulation Economics" requires a political rupture from the Dunn-Wilks model.

Supporting the Kalispel Tribe Buffalo Herd

The MSH Ark pilot project supports the Kalispel Tribe by providing high-nutrient "Winter Fodder" grown using recovered heat. Buffalo (q̓ʷyq̓ʷay) are central to the cultural obligation of the Kalispel people. The sovereignty pathway involves transitioning bison meat from "custom exempt" processing to voluntary USDA federal inspection.

This transition requires infrastructure modifications at the Usk site, including handling equipment that complies with 9 CFR 313 and carcass cooling systems for halved carcasses. This allows

Safeway Newport to sell a premium, culturally significant product while restoring a stable, local protein supply.

The Mandatory Threshold for Future Operations

The audit issues a "Lead Investor's Mandatory Threshold" for all future operations at the Usk node to ensure regional reconciliation :

1. **Physical Grounding:** All hardware must be submerged in immersion fluid and grounded via sacrificial anodes to eliminate "harmonic flaying" and Induced Seismicity.
2. **Auditable Capital:** Financial and resource flows must be managed via the MSH Protocol's immutable ledger to eliminate the "Email Gap".
3. **Circular Resource Dynamics:** Projects must achieve a minimum of 90% heat recovery for municipal restoration and agricultural sovereignty.
4. **Tier 1 Capital Alignment:** Assets must be aligned with Executive Order 14233, "Establishment of the Strategic Bitcoin Reserve," classifying the infrastructure as Tier 1 Capital.

Profiles in Skill-Sovereignty: The PUD Commissioners

The implementation of the Great Inversion depends on the leadership of the Pend Oreille PUD Commissioners, whose professional backgrounds provide a unique "Skill-Sovereignty" matrix.

Commissioner	Background	Heroic Narrative for Regional Restoration
Curtis J. Knapp	Psychology/Mortuary Science	Expert in "Dignity Assets" and ethical resource stewardship
David W. Rick	Hydroelectric/Marine Engineering	Engineer of regional solvency and grid stabilization
J. Troy Moody	Construction/Small Business	Architect of the physical MSH Ark and urban resilience

These commissioners have the legislative authority under RCW 42.23 and RCW 84.34 to transform Section 33 into a "Digital Shelter for Biological Sovereignty".

Conclusion: Transformation of Trauma Churn into Mathematical Performance

The analysis provided in this forensic audit demonstrates that the Pend Oreille Public Utility District is currently operating under a model of "Extraction Logic" that has reached its Arrhenius limit. The thermodynamic debt of legacy assets and the seismic threat to the Ione Tunnel represent a literal "Rupture" in the regional fabric. The Sovereign Ark and the MSH Protocol provide the only viable path to reconciliation, replacing the "Theological Trusteeship" of external billionaires with a localized "Fiduciary Trusteeship".

By reclassifying the Usk node as Agricultural Farmland and mandating 90% heat recovery, the PUD can restore the water-energy nexus and fund essential community services. The choice of design—between extraction and circulation—is the only remaining variable. The Sovereign Ark ensures that the dignity and biological assets of the people are caught by a design of safety, transforming "Trauma Churn" into "Mathematical Performance" and securing the long-term solvency of the district.

Structural Integration of Circulation Economics in Retail: A Professional Build-Out Proposal for Safeway Newport and the Making Smiles Happen Ark Pilot

The grocery retail industry in North America is currently navigating a period of profound structural tension. On one side lies the legacy of the twentieth-century "Extraction Logic," a model predicated on linear throughput, the externalization of environmental costs, and the categorization of unsold inventory as a fiscal liability to be extinguished through disposal. On the other side is the emerging "Circulation Economy," a paradigm that views every unit of unconsumed inventory, every joule of waste heat, and every byproduct of the supply chain as a "Dignity Asset" with the potential to catalyze regional solvency. This proposal details a comprehensive build-out for Safeway stores, specifically the Safeway Newport location, through a strategic partnership with the Making Smiles Happen (MSH) initiative and the development of the Usk Mill Ark pilot program in Pend Oreille County.

The core objective of this transition is to move beyond the traditional "take-make-waste" flow that has historically defined Safeway's operational footprint. While Albertsons Companies has made notable strides in sustainability—reporting a 23.8% reduction in carbon emissions and the donation of 113 million pounds of surplus food in 2024—the systemic architecture of the industry remains tethered to extraction. By integrating the MSH Ark's Universal Inventory Interchange (UII) Protocol and leveraging the massive thermal assets of the Usk Mill, Safeway Newport can pioneer a sovereign economic loop that converts liability into community-serving capital.

Historical Context and the Persistence of Extraction Logic

To understand the necessity of the MSH Ark proposal, one must analyze the foundational drivers of traditional grocery waste policies. Extraction Logic is not merely a set of bad habits; it is a sophisticated system of accounting and logistics designed for a world of perceived infinite resources and low disposal costs. For retailers like Safeway, waste disposal has long been viewed as an inevitable cost of business, driven by three primary structural forces.

Static Asset Accounting and Tax Incentivization

The first driver is the prevalence of static asset accounting. In this framework, inventory is viewed as a fixed financial value on the balance sheet until the moment of sale. When a product approaches its expiration date or loses its aesthetic appeal, it does not gradually transition into a secondary market within the system; instead, it is written off in a binary event. Historically, tax codes in the United States have incentivized this write-off process. By documenting a total loss

on "shrink," retailers can reduce their taxable income in a way that is often more administratively simple than the complex logistics of food recovery.

This creates a perverse incentive where destruction is rewarded over redistribution. Even with the introduction of AI-assisted forecasting tools like Afresh, which Safeway uses to minimize excess inventory, the underlying accounting logic remains focused on the "sell or write-off" dichotomy. The MSH proposal seeks to replace this with a "Dynamic Asset" model, where the value of a product is continuously tracked and redirected toward its highest and best use—whether that is human consumption, livestock fodder, or soil nutrient density.

Logistical Friction and the Black Box Dilemma

The second driver is logistical friction. Standard retail systems are built for a linear flow: goods move from the producer to the distribution center, then to the retail shelf, and finally to the consumer’s home. These systems are "Black Boxes" in that they lack the real-time, "Glass Box" transparency required to identify and move perishable capital before it degrades to zero value. When a surplus of highly perishable produce, such as organic leafy greens, is identified at the store level, the friction of coordinating transport, ensuring cold chain integrity, and finding a recipient often exceeds the immediate capacity of the store management.

Safeway’s current partnership with Divert, Inc. attempts to mitigate this by using reverse logistics and anaerobic digestion to convert inedible food into renewable energy. While this is an improvement over landfilling, it still represents a loss of caloric and nutritional value. The MSH Ark proposal addresses this by using the UII Protocol to create a real-time, automated matching system that eliminates the friction of redistribution.

Liability Management and Regulatory Risk Aversion

The third and perhaps most significant driver of Extraction Logic is the management of liability. In the grocery industry, the fear of regulatory non-compliance often dictates policy. This is particularly evident in the handling of "amenable" and "non-amenable" species. Amenable species, such as cattle, pigs, and sheep, are subject to mandatory inspection under the Federal Meat Inspection Act. Non-amenable species, like bison or wild game, fall into a regulatory gray area where "custom exempt" status allows for processing for personal use but prohibits retail sale.

For a retailer like Safeway, the complexity of navigating these regulations—combined with the risk of distributing expired Over-the-Counter (OTC) medications—often leads to a "destruction first" policy to mitigate legal exposure. Products that are perfectly safe and useful, such as toiletries or medications near their expiration date, are destroyed to ensure that the corporation never faces a liability claim. The MSH Ark proposal transforms this risk into a "Dignity Asset" by providing a safe, regulated facility—the Wellness Center—where these items can be donated and distributed under a protocol that restores agency to the recipient while protecting the donor.

The MSH Ark Proposal: A New Architecture for Circulation

The MSH Ark proposal, centered on the Usk Mill site in Pend Oreille County, represents a fundamental shift from extraction to circulation. This pilot program is designed to harmonize industrial waste heat, advanced digital protocols, and biological systems to create a self-sustaining regional economy.

Comparison of Operational Paradigms

The following table contrasts the existing policies governing Safeway's operations with the proposed enhancements offered by the MSH Ark initiative.

Feature	Safeway Current Policy (Extraction)	MSH Ark Proposal (Circulation)
Thermal Energy	Waste heat from refrigeration and facilities is vented or requires high-cost mitigation.	**Thermal Arbitrage:** 94 million BTUs/hr of waste heat from the Usk Mill maintains a 10-acre greenhouse.
Organic Waste	Food culls are treated as "shrink" and sent to landfills or anaerobic digesters.	**Winter Fodder Factory:** Vegetable culls and hydroponic fodder support the Kalispel buffalo herd.
Perishable Logistics	Linear "take-make-waste" flow with high friction for redistribution.	**UII Protocol:** Uses a "Generosity Engine" to match inventory with community needs in real-time.
Pharmaceuticals	OTC medications and toiletries are destroyed upon expiration to mitigate risk.	**Wellness Center:** A regulated facility for donating toiletries and medications to restore agency.

Meat Distribution	Relies on global supply chains and amenable species regulations.	**Sovereign Loop:** Transition from "custom exempt" to voluntary USDA inspection for retail bison sale.

The Universal Inventory Interchange (UII) Protocol

A critical component of the MSH Ark is the Universal Inventory Interchange (UII) Protocol. This protocol is an open standard designed to allow AI clients and autonomous systems to transact directly with commerce stacks. In the context of the Safeway build-out, the UII Protocol acts as the "Generosity Engine." It utilizes a SHA-256 cryptographic audit chain to ensure an immutable and transparent record of every asset that moves through the system.

The UII Protocol is powered by the Base44 SDK, which allows for fast CRUD operations and real-time synchronization between Safeway's inventory management systems (such as Afresh) and the MSH distribution network. This creates what the proposal calls "Glass Box" transparency. When a store like Safeway Newport identifies a surplus of inventory, the UII Protocol automatically calculates the "Generosity Score" (GS) for the store and matches the resource with a "Trust Custodian" who validates the need within the community without exposing the vulnerability of the recipient.

The Usk Mill Pilot: Infrastructure and Thermal Arbitrage

The physical heart of the MSH Ark proposal is the Usk Mill site. This location has been the focus of significant economic interest, including a proposed $300 million silicon smelting facility designed to create hundreds of jobs and support the solar and computer chip industries. The industrial legacy of the site provides a massive opportunity for thermal arbitrage—the process of capturing and repurposing waste heat that would otherwise be lost to the atmosphere.

Capturing Industrial Waste Heat

The Usk Mill project is estimated to produce 94 million BTUs per hour of waste heat. In the climate of Pend Oreille County—a Zone 6 environment where winter temperatures can plummet to -20°F—this heat is a resource of immense value. By diverting this heat into a 10-acre greenhouse complex, the MSH Ark can facilitate year-round production of fresh produce and fish, regardless of external weather conditions.

This thermal synergy allows for the growth of "Winter Fodder," a system that addresses the seasonal nutritional deficit faced by regional livestock. Historically, English agriculture underwent a "yeoman’s revolution" by utilizing winter fodder to increase animal-to-land ratios and improve soil fertility through manure. The MSH Ark modernizes this concept by using hydroponic systems to grow nutrient-dense fodder (such as oats, maize, and clover) inside the heated greenhouse, utilizing vegetable culls from Safeway as a base substrate.

Supporting the Kalispel Tribe Buffalo Herd

The MSH Ark pilot is specifically designed to support the Kalispel Tribe's buffalo herd management. Buffalo are essential to the cultural and ecological health of the region, but maintaining a healthy herd through the "winter slump" is a significant financial and logistical challenge for the tribe. The MSH Ark provides two primary technologies to mitigate this:

1. **Bio-Sponge Technology:** This involves using the organic byproducts of the greenhouse and fodder factory to create a high-nutrient "sponge" for pastures. This enhances the soil's water-retention capacity and nutrient density, allowing for higher grazing efficiency and healthier animals.
2. **Winter Fodder Systems:** By providing a consistent supply of sprouted grains and processed vegetable culls from Safeway Newport, the MSH Ark ensures the buffalo herd has access to high-quality feed throughout the winter, reducing the reliance on expensive, imported hay.

Regulatory Navigation and the Shift to USDA Inspection

One of the most complex hurdles in the Safeway build-out proposal is the transition from "custom exempt" processing to voluntary USDA federal inspection for bison meat. Currently, many small-scale meat producers in Washington and Idaho operate under custom exempt status, which means the meat is processed for the owner's personal use and must be marked "not for sale".

For Safeway Newport to sell Kalispel buffalo meat at retail, the processing must take place in a facility that has been modified to handle both federally inspected and exempt livestock. This requires a significant infrastructure investment to meet USDA Food Safety and Inspection Service (FSIS) standards, including requirements for sanitation, carcass handling, and labelling. The MSH Ark proposal includes the build-out of such a facility at the Usk Mill, enabling Safeway to provide a high-quality, local protein source that supports tribal sovereignty and regional food security.

Financial Dynamics: The Formula for Dignity Assets

The MSH Ark proposal introduces a new mathematical framework for understanding the economic benefits of the Circulation Economy. For a store like Safeway, the conversion of waste into an asset is represented by the formula $A^2 + B^2 = C^2$.

The Liability Conversion Formula

In this equation:

- A^2 represents the **Waste/Liability Value**. This includes the financial cost of shrink, the administrative burden of disposal, and the environmental impact of landfilling or carbon-intensive recovery.

- B^2 represents the **Infrastructure/Circulation Value**. This includes the UII Protocol, the thermal energy from the Usk Mill, and the "Generosity Engine" that matches resources with needs.
- C^2 represents the **Dignity Asset Value**. This is the final product—the stabilized regional food supply, the restored agency of community members, and the high "Generosity Score" that enhances Safeway's brand equity and social integrity.

By utilizing this formula, Safeway converts a balance sheet liability (A) into a community-serving asset (C). This is not a simple philanthropic donation; it is a structural transformation that reduces logistical friction and creates a "Sovereign Economic Loop." In this loop, the wealth generated by the community (through labor and commerce) remains within the region, rather than being exported to pay for global supply chain costs or waste disposal fees.

Regional Solvency and the Polycrisis

The MSH Ark proposal is positioned as a safeguard against the "polycrisis"—the simultaneous occurrence of global supply chain disruptions, climate instability, and economic volatility. By creating a local, stable food supply of bison, greenhouse produce, and fish, Pend Oreille County gains regional solvency. Safeway Newport, as the retail anchor of this system, becomes more than a grocery store; it becomes a critical node in a resilient community infrastructure.

Governance and Community Leadership: The Pend Oreille PUD

The implementation of the MSH Ark requires the active participation and oversight of the Pend Oreille Public Utility District (PUD). The PUD is governed by three locally elected commissioners who serve six-year staggered terms and establish the legislative authority for the district. The backgrounds of these commissioners provide a unique alignment of expertise for the MSH Ark project.

Commission Profiles and Strategic Alignment

Commissioner	Background	Relevance to MSH Ark & Safeway Proposal
Curt Knapp (President)	Former funeral home owner; deputy coroner; degree in Psychology and Mortuary Science.	Brings a deep understanding of "Dignity" and the ethical handling of community resources. His experience in the funeral business highlights the importance of

		agency and respect in sensitive transitions.
Dave Rick (Vice President)	Former Chief Hydroelectric Operator; Merchant Marine Engineering Officer; expert in air defense and power systems.	Offers the technical and logistical expertise required to manage the complex thermal arbitrage and hydroelectric assets associated with the Usk Mill and regional power grids.
Troy Moody (Secretary)	Contractor specializing in drywall and construction; small business owner (My Sidewalk Café); lifelong resident.	Provides the "hands-on" expertise for the physical build-out of the MSH Ark infrastructure and understands the challenges of local commerce and small business integration.

These commissioners are not only administrators; they are community leaders who understand the nuances of the region. Commissioner Rick’s experience in logistical support during Operation Desert Storm and Commissioner Knapp’s role on the board of Energy Northwest demonstrate a high capacity for managing large-scale, mission-critical infrastructure projects like the MSH Ark.

Safeway's "Recipe for Change" as a Foundation

Albertsons Companies' "Recipe for Change" is the strategic framework that already guides Safeway’s sustainability efforts. The MSH Ark proposal is designed to integrate seamlessly into this framework, pushing its goals from incremental improvement to systemic transformation.

Climate Action and Carbon Neutrality

Safeway is committed to achieving net-zero emissions in its own operations by 2040 and reducing downstream carbon emissions from the use of sold goods by 27% by 2030. Currently, the company focuses on energy efficiency projects—completing over 600 in 2024—and transitioning to lower-impact refrigerants.

The MSH Ark accelerates these goals by providing carbon-negative inputs. For example, the use of waste heat from the Usk Mill to grow produce locally eliminates the carbon footprint associated with long-haul trucking from California or Mexico. Furthermore, the "Bio-Sponge" technology utilized for the Kalispel buffalo herd acts as a carbon sequestration mechanism, turning the soil into a massive carbon sink.

Waste Reduction and the Circular Economy

Albertsons has set a goal of zero food waste going to landfill by 2030. In 2024, approximately 98% of stores donated unsold food each week, and 70% of stores operated food waste diversion programs. However, as noted in the research, even donated food often counts as "shrink" and can average 5.5% in produce departments.

The MSH Ark proposal transforms this shrink. Instead of being an "inedible waste" diverted to a digester, the food culls become high-value "Winter Fodder." This moves the inventory higher up the EPA Food Recovery Hierarchy—from "Industrial Uses" to "Animal Feed"—retaining more value within the local ecosystem.

Nourishing Neighbors and Community Stewardship

The "Nourishing Neighbors" program is Albertsons' primary vehicle for fighting food insecurity, contributing more than $435 million in food and financial support in 2024. The program focuses on reducing food insecurity at a local level so that all neighbors can thrive.

The MSH Ark's UII Protocol and Generosity Engine provide a "Middle Tech" solution that enhances this mission. By using AI to match surplus inventory with community needs in real-time, the MSH initiative ensures that no meal is missed and that every donation is handled with "Medical Precision" and "Soul-ution" focus. This dignity-first protocol ensures that the patient's or recipient's vulnerability is never exposed, as the Trust Custodian validates the need by proxy.

The Role of Technology: Afresh AI and the UII Protocol

A key factor in the success of Safeway Newport's build-out is the integration of existing technologies with the new MSH infrastructure. Safeway currently utilizes Afresh technology in its produce, meat, and seafood departments to enhance order accuracy and minimize excess inventory.

From AI Forecasting to Agentic Commerce

Afresh uses AI to provide "Glass Box" insights to team members, helping them order exactly what is needed based on real-time sales data and freshness markers. The MSH Ark proposal takes this a step further by introducing "Agentic Commerce." Through the UII Protocol (and its similarity to the Agentic Commerce Protocol developed by OpenAI), AI agents like Google's Gemini can move beyond recommending products and into executing purchases and donations on behalf of the store or the consumer.

When Safeway’s inventory system identifies a surplus that cannot be sold, the UII Protocol can immediately alert the MSH Generosity Engine. The engine then coordinates the autonomous matching of that surplus with a local need, perhaps a community kitchen or the buffalo fodder factory, without requiring manual intervention from store staff. This reduces the "Logistical Friction" that often prevents timely food recovery.

Cryptographic Security and Trust

The MSH Ark operational layer utilizes the Base44 SDK for fast data operations, but its audit layer is what provides the necessary trust for corporate partners. By using SHA-256 cryptographic hashing and a blockchain-style hash chain, the MSH initiative provides an immutable audit trail of every transaction. For Safeway, this provides transparent verification of its social impact, which is essential for ESG (Environmental, Social, and Governance) reporting and tax compliance.

Detailed Pilot Implementation at Safeway Newport

The pilot program at Safeway Newport, under the leadership of Rosa Chitwood, will serve as the blueprint for future build-outs. This location is uniquely positioned due to its proximity to the Usk Mill and the Kalispel Tribe.

Step 1: Physical Infrastructure Retrofitting

The Newport store will be equipped with specialized collection stations for organic culls. Unlike standard trash bins, these stations are designed to maintain the nutritional integrity of the culls for use in the Winter Fodder Factory. The store will also establish a dedicated "Dignity Drop" zone for toiletries and OTC medications destined for the Wellness Center.

Step 2: Digital Integration

Safeway Newport will integrate its inventory management stack with the MSH Partner Portal. This ceremonial onboarding process ensures that all structural commitments are verified and that the store’s "Generosity Score" is calculated in real-time. The store will utilize the MSH Launch Agent 703—a self-governing monitoring system—to ensure autonomous compliance with food safety and regulatory standards.

Step 3: Logistics and Thermal Arbitrage Linkage

The daily "waste" from Safeway Newport will be transported to the Usk Mill site using a dedicated, low-emission logistics loop. At the mill, the culls will be processed using the 94 million BTUs of waste heat into fodder or compost for the buffalo pastures. In return, Safeway Newport will receive a consistent supply of ultra-local produce from the MSH greenhouse and USDA-inspected bison meat from the Kalispel herd.

Economic Impact and Long-Term Sustainability

The financial benefits for Safeway extend beyond the conversion of shrink into tax-deductible donations. The MSH Ark proposal creates a more stable and predictable regional economy.

Reducing the Cost of Disposal

By diverting organic waste to the Winter Fodder Factory, Safeway Newport significantly reduces its tipping fees and waste management costs. While partnerships with companies like Divert provide some relief, the MSH loop is more efficient because it eliminates the need for high-energy depackaging and anaerobic digestion for a significant portion of the waste stream.

Enhancing Brand Equity and Customer Loyalty

Modern consumers, particularly in the Pacific Northwest, are increasingly sensitive to the social and environmental impact of their grocery choices. By participating in the MSH Ark, Safeway Newport earns a high Generosity Score, which can be shared with customers through digital dashboards and in-store displays. This transparency builds deep trust and loyalty, positioning Safeway as a "Soul-ution" oriented retailer rather than a mere commodity merchant.

Creating a Stable, Local Supply Chain

The current grocery model is highly vulnerable to global supply chain shocks. By fostering a local supply of protein (bison) and produce (greenhouse), Safeway Newport insulates itself from the "polycrisis." This regional solvency ensures that the store can remain open and stocked even during fuel shortages, pandemics, or extreme weather events—an essential service for a rural community like Newport.

Conclusion: A Blueprint for the Future of Retail

The transition from Extraction Logic to a Circulation Economy is not merely an optional sustainability initiative; it is a fundamental reconfiguration of the retail value chain. The MSH Ark proposal for Safeway Newport demonstrates that by leveraging industrial waste heat, advanced digital protocols, and local tribal partnerships, a grocery store can transform from a source of waste into a source of regional wealth.

The combination of the UII Protocol’s "Generosity Engine," the Usk Mill’s thermal assets, and the Kalispel Tribe’s buffalo herd provides a scalable model for sovereign economic loops. For Safeway, this model offers a clear path to achieving its "Recipe for Change" goals while simultaneously reducing liabilities and increasing regional solvency. Under the guidance of the Pend Oreille PUD commissioners and the leadership of grocery experts like Rosa Chitwood, this build-out can move Pend Oreille County—and the entire Safeway network—toward a future where dignity, efficiency, and community health are the primary metrics of success.

From: Tanya Comstock
To: Plan Spokane
Date: Thursday, February 5, 2026 9:55:16 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

When they build apartments they need a sign on them if they're low income and cops need to help us if someone wants people to buy them stuff with their money and every skywalk needs to be open every day and every hotel and motel needs to give disabled adults free rooms and let them stay as long as they want

A, B, C, D

From: Deanette Christopherson
To: Plan Spokane
Subject: Plan Spokane drafts 2046
Date: Tuesday, February 17, 2026 2:16:54 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello,
I am a Spokane county citizen and would like to address my concern about our land use and conservation of public land. I am writing to you to please consider conserving the land we have around our beautiful city.

We have other ways of promoting growth to our city by other means, such as going up not out. Just because we have space doesn't mean we have to use it for our interest.

I am asking the City of Spokane that you support and protect our natural lands and wildlife habitat.

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 (See photo). B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 (See photo) shows all neighborhoods will be exempted from environmental review in two phases. C

4. Suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3 (See photo). Existing Hard (Impervious) Surfaces included below.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

Yours Truly,

Deanette Christopoherson

From: Tanya Comstock
To: Plan Spokane
Subject: Re:
Date: Friday, February 6, 2026 9:44:17 PM
Attachments: image001.png
image001.png

[CAUTION - EXTERNAL EMAIL - Verify Sender]

The city needs to come to people's place and check on them and hospitals need to keep people in their and need to see if they can walk around and do things and we need better cops that will help us

A

On Fri, Feb 6, 2026, 8:29 AM Plan Spokane <eraplanspokane@spokanecity.org> wrote:

> Good morning Tanya Comstock,
>
> Thank you for providing your comments. They have been documented as part of the PlanSpokane 2046 Periodic Update and will be part of the decision-making record.
>
> Please reach out with any questions or additional comments,
>
> Best,
>
> Hollis
>
> PLANSPOKANE
> Resilient | Connected | Livable | 2046
>
> **Hollis Staal** *(they/them)* | City of Spokane | Planner II | Planning & Economic Development | hstaal@spokanecity.org | spokanecity.org
>
> *Help shape the future of the City of Spokane! Learn more about PlanSpokane 2046 at PlanSpokane.org*
>
> *This email is subject to Washington State Public Records Act, Chapter 42.56 RCW, and may therefore be subject to public disclosure.*

From: Tanya Comstock <tanyac425@gmail.com>
Sent: Thursday, February 5, 2026 9:55 PM
To: Plan Spokane <eraplanspokane@spokanecity.org>
Subject:

[CAUTION - EXTERNAL EMAIL - Verify Sender]

When they build apartments they need a sign on them if they're low income and cops need to help us if someone wants people to buy them stuff with their money and every skywalk needs to be open every day and every hotel and motel needs to give disabled adults free rooms and let them stay as long as they want

C
B
D

From: Karen Conlin
To: Plan Spokane
Date: Wednesday, February 18, 2026 4:58:25 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I strongly support protection of wildlife habitat and protection of natural lands. A
Karen Conlin

From: Mayson Cooke
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Saturday, February 21, 2026 8:37:12 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:
Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A
Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B
Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C
Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.
Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D
If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C
I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Mayson Cooke
2918 E South Riverton Ave. Spokane, Wa 99207

From: cmkacc@q.com
To: Plan Spokane
Subject: Plan Spokane 2046 draft EIS comments
Date: Wednesday, February 18, 2026 4:01:40 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Greetings.

As a resident of Spokane, I value the quality of life in the city, including the natural diversity of the area, even as we struggle to provide more housing (especially low-income housing). And I am a citizen concerned about, and involved in matters trying to address, global warming and especially local urban heat. The need to increase housing inevitably runs into the concern about urban heat, as housing is considered, and development may result in the decrease of the urban tree canopy. A

Concerning the draft of the EIS, I urge the city to consider approaches that do not reduce the urban tree canopy, including addressing development that might result in old-age trees being cut down. B

Respectfully,

Chris Coppen, LICSW

From: Julie Cordero
To: Plan Spokane
Subject: Our Climate repsonsibility
Date: Tuesday, February 17, 2026 8:43:21 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

With the federal government tearing down important climate legislations nearly daily, it is up to cities and states to do what we can. Spokane is such a lovely city. Let's protect our environment as best we can here in Spokane!
I strongly prefer Alternative 3 as the City's selected growth alternative. This support is conditioned on the EIS adequately evaluating cumulative environmental impacts at the comprehensive plan level and ensuring that those impacts are avoided or mitigated through adopted development regulations, consistent with SEPA. A
I oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. B
Thank you,

Julie Cordero
Resident, Spokane, WA 99202
corderographics@gmail.com

From: Eve Costello
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 11:25:37 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

SPOKANE URGENT ALERT: Action Required By Wednesday, Feb 18.

Dear City of Spokane:

Please protect urban wild spaces and access!

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 (See photo). B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 (See photo) shows all neighborhoods will be exempted from environmental review in two phases. C

4. Suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3 (See photo). Existing Hard (Impervious) Surfaces included below.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships. D

Yours Truly,
Eve Costello

Eve Costello
Editor
1204 S. Coeur d'Alene St.
Spokane, WA USA
m: 509-714-1826

From: Margot Crabtree
To: Plan Spokane
Subject: 2046 Draft EIS
Date: Friday, February 13, 2026 2:03:18 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

RE: PlanSpokane 2046 Draft EIS Comments

Tirrell Black, Assistant Planning Director
City of Spokane
808 W Spokane Falls Blvd.
Spokane, WA 99201

Hi Tirrell,

I am fortunate to live along the Spokane River corridor in the Lower Crossing neighborhood below Kendall Yards, and I am grateful each day that we have such a jewel in the Spokane River. I am enjoying a beautiful view of the river even as I write this, and I am conscious of the life and beauty the river and its environs, including the animals, birds, plants and trees, and the people, and the fullness that they bring to our community. Every spring, summer and fall, I revel in the hundreds of rafts, inner tubes and kayaks floating down the river as it passes outside my window. People of Spokane love their river!

In the past, we have been pretty thoughtless about having such a natural resource for all to enjoy. I would say "at our disposal," because that is how it was used! Approvals for development in previous years were very laissez-faire, and buildings went up with very little concern for the need to protect the river. But we know better now, as much effort, time and money have been spent in restoring the riverway and preserving the riparian corridor. Once we say, "Heck, okay, build anywhere, build anything!", our precious natural waterway will be gone, despoiled, and overbuilt. This would be short-sighted in the extreme. Perhaps this cautionary attitude flies in the face of the city's desire for infill, but exceptions made for the well-being of all citizens and for the unspoiled nature and habitats that we champion as Spokane's heritage will be obvious as we move into a more harmonious future. The indigenous who lived and fished along this river for many generations knew what we had, and took pains to shepherd their resources so that future generations could benefit.

The Parks Department had the foresight to plan many beautiful parks throughout Spokane. We must continue their legacy with modern tools and insights. Infill may be approved throughout the city, but to protect our finite natural resources and especially the River should be one of the highest priorities. Without it, the old slogan "Near Nature, Near Perfect," will be something known to future generations only through images on digital media.

A

Thank you for allowing me to give voice to the voiceless.

Regards,
Margot

Margot Crabtree
Trade Trends
(509) 280-3896
www.tradetrendsonline.com

"For there is always light
If only we're brave enough to see it
If only we're brave enough to be it."
~ Amanda Gorman

From: Gail Daehlin
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 7:26:03 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity. To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas: Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction. Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. I look forward to your response and to seeing these protections reflected in the upcoming plans for our city! Sincerely, Gail Daehlin

A
B
C
D
C

From: Caitlin Daniel
To: Plan Spokane
Subject: Plan Spokane 2026 Near Nature, Near Perfect
Date: Thursday, February 26, 2026 7:46:03 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing regarding the proposed development plans and environmental review exemptions currently under consideration. I am DEVASTATED that the council would consider allowing this to be passed, excluding neighborhood councils and allowing for the concerns of developers to be put over residents and our nature. C

Our city's slogan is "Near Nature, Near Perfect," this policy suggests a stark contrast from our slogan. Perhaps "Was Nature, Now Developed" is the theme of this new policy?

The policy also makes it so that no one of low-income, or hardly anyone of low-income will benefit. As the developers interests are aligned with building homes for higher income individuals. So now we are going to out price residents and gentrify our whole city? What an inhumane idea.

To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we choose to develop without transparency, or thorough environmental review, we are creating damage that cannot be undone. Nature is not creating new parks. Nature is not creating new wildlife habitat; it is up to the residents of Spokane to create that, to protect that. C

Please remember our slogan, think of our beautiful city and the children who will enjoy the

canopy in the future. Consider the animals, the trees and why the South Hill is to beautiful and desirable to begin with; it is because of all of the Nature. We are a part of Nature, and the further you remove humans from nature, the worse life gets for all.

Respectfully,
Cait Daniel
Spokane County Employee

From: VDarrell
To: Plan Spokane
Subject: Spokane proposed Comprehensive Plan Infill Exemption
Date: Thursday, March 5, 2026 4:42:39 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Before adopting this exemption, the City should provide the public with data supporting this change. The data should include: A
* the number of residential (broken down by type - single family, duplex, 4-plex, multi-family) and commercial units permitted in 2025 and 2026 to date
* the current vacancy rate for the units (by type)
* projected population growth for the next 20 years
* projected impact of this growth on water supplies, wastewater treatment capacity, solid waste management, energy, air quality, police and fire response.

This exemption may significantly affect quality of life due to increased density and stressed resources. Citizens of Spokane should have the right to vote on this proposed change. B

Virginia Darrell
Sent from my iPad

From: Erin D. Dascher
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 8:38:02 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello,

I strongly prefer Alternative 3 as the City's selected growth alternative. This support is conditioned on the EIS adequately evaluating cumulative environmental impacts at the comprehensive plan level and ensuring that those impacts are avoided or mitigated through adopted development regulations, consistent with SEPA. Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits. A, B

The City is considering expanded use of SEPA infill and housing exemptions. Given this approach, I urge the City to establish clear guardrails before broadly applying exemptions, including completing an inventory of existing urban natural assets, such as tree canopy, habitat value, and ecological connectivity, to ensure that infill development does not result in unmitigated impacts to environmental resources within urban neighborhoods. C D

I oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 in the EIS, shows all neighborhoods will be exempted from environmental review in two phases E

I support environmental review exemption only if the proposed development area is 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces.

EDD

--
I made a misstatement and I stand by all my misstatements - Dan Quayle

From: Vincent Davi
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, March 5, 2026 12:12:41 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello,

I'm a Spokane-area resident and wanted to share a few thoughts as you plan for the city's future.

First, protecting the Spokane River should remain a top priority. It's one of the most important natural features of Spokane, and future growth should make sure the river stays clean, healthy, and safe for wildlife and people. A

Parks are also really important to the quality of life here. I hope the city continues investing in parks so they are safe, clean, and welcoming places where people can relax, spend time outside, and connect with their community. B

Another priority is neighborhood safety. Well-maintained streets, good lighting, and safe public spaces make neighborhoods feel more livable and help people feel comfortable spending time in their communities. C

Libraries are another important resource for Spokane. They provide safe spaces for people to gather, learn, use the internet, and access community services, and they're especially valuable for young people and families. D

I also hope the city continues supporting small businesses, since they help make neighborhoods unique and keep Spokane's local economy strong. E

Transportation improvements should continue to be a focus. Expanding public transit, improving walking and biking options, and maintaining our roads will help people get around the city more safely and reliably. F

Affordable and supportive housing is very important as well for so more people, including those experiencing homelessness, to have access to stable and safe places to live. G

Finally, as Spokane grows, I hope the city focuses on strengthening existing neighborhoods rather than expanding outward in ways that strain infrastructure and natural areas. H

Thank you for taking community input into consideration.

Vincent Davi

From: Jodie Davis
To: Plan Spokane
Subject: PlanSpokane 2046 draft EIS Comments
Date: Wednesday, February 18, 2026 12:38:48 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

RE: PlanSpokane 2046 draft EIS Comments

As I understand it, the City of Spokane intends to eliminate Environmental Review of developments to encourage infill in ALL parts of the city.

This Draft EIS will guide our city's growth for the foreseeable future and as written does not support our overall goals for our city.

Spokane "near nature, near perfect". Does your plan include alternative mottos like "keep Spokane kinda gross".

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 (See photo). B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 (See photo) shows all neighborhoods will be exempted from environmental review in two phases. C

4. Suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3 (See photo). Existing Hard (Impervious) Surfaces included below.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

As a property owner and taxpayer, I do not want to sacrifice every single bit of nature, green, wetland, tree canopy, and animal habitat in favor of development. Where is the mindfulness of all of our goals for our city? Infill is not and should not be our only focus, it in fact will sacrifice our other longstanding goals and commitments. Very shortsighted in my opinion. I am not against all development, but I am against there being zero thought regarding environmental impact of development. C

Jodie Davis

From: dikota@mac.com
To: Plan Spokane
Subject: Please Protect the Environmental Review
Date: Wednesday, February 18, 2026 12:10:18 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City of Spokane Governance:

Please protect at all costs the environmental review of developments within Spokane City. Environmental reviews of development within the city protect us all from damaging delicate ecosystems that provide critical natural habitat for wildlife (both human and non human) and enhance everyone's quality of life. C

Please support natural land inventory and tree canopy inventory with strong, enforceable codes. Without natural land and tree inventories the City, County and citizens cannot be informed to make decisions that affect all of us. Indeed the Growth Management Act requires protecting of important natural areas, forests and natural lands. A

I urge you to support the strongest ordinances that protect critical natural areas, animal habitat, and water quality. Throughout Spokane City there are unprotected natural lands that need stewardship now and for our children's future. B

I wholeheartedly oppose blanket environmental review expeditions because they do not adequately protect water quality, natural areas, wetlands, critical areas or our neighborhoods. C

I strongly urge you through strong codes, capital investment and regional partnerships to protect, restore, acquire and maintain urban agricultural lands, urban forests, shorelines, critical habitats, and open spaces as interconnected natural systems. These provide heat reduction, flood protection, and carbon sequestration. D

There are too many examples across the country where urban growth has been managed by only considering short-term profit at the expense of the natural environment and quality of life for the citizens. Please do no allow this to happen in the city of Spokane. I support sensible urban growth that protects the natural environment.

Thank you for considering my opinion.

Timothy Diko
East Oval Street, Spokane, WA 99205

From: sunnyjcd@gmail.com
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS comments
Date: Wednesday, February 18, 2026 9:35:04 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

My input is as follows:

I support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands A

I support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 (See photo). B

I oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 (See photo) shows all neighborhoods will be exempted from environmental review in two phases. C

I support environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3 (See photo). Existing Hard (Impervious) Surfaces included below.

I support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships. D

Julie Drobny

From: John Edmondson
To: Plan Spokane
Subject: Re: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 5:26:25 PM
Attachments: image001.png
image001.png

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Thank you!

I also continue to be very interested in seeing the city prioritize:
- planting edible plants and inviting the community to benefit from the produce
- planting native edible plants whenever possible
- using regenerative practices to reduce the use of chemicals, improve the health of the soil, and increase the nutrition of the produce.

E

Peace,

Johnny Edmondson
509-389-7941

On Tue, Feb 17, 2026, 4:57 PM Plan Spokane <eraplanspokane@spokanecity.org> wrote:

> Good afternoon John Edmondson,
>
> Thank you for providing your comments. They have been documented as part of the PlanSpokane 2046 Draft Environmental Impact Statement and will be part of the decision-making record.
>
> Please reach out with any questions or additional comments.
>
> Best,
>
> Hollis
>
> PLANSPOKANE
> Resilient | Connected | Livable | 2046
>
> **Hollis Staal** *(they/them)* | City of Spokane | Planner II | Planning & Economic Development | hstaal@spokanecity.org | 509-625-6854 | spokanecity.org
>
> *Help shape the future of the City of Spokane! Learn more about PlanSpokane 2046 at PlanSpokane.org*

This email is subject to Washington State Public Records Act, Chapter 42.56 RCW, and may therefore be subject to public disclosure.

From: John Edmondson <jedmondson77@gmail.com>
Sent: Tuesday, February 17, 2026 4:50 PM
To: Plan Spokane <eraplanspokane@spokanecity.org>
Subject: PlanSpokane 2046 Draft EIS Comments

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hi Friends,

Please consider the following in regards to supporting the protection of natural lands and wildlife habitat in the PlanSpokane 2046 Draft Environmental Impact Statement (EIS).

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, and wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support for an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City. B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. C

4. Support environmental review exemption only if 100% disturbed and impervious.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

Thank you!

Johnny Edmondson

Mobile: 509-389-7941

From: Karen Edwards
To: Plan Spokane
Subject: Proposed UGB/infill proposal
Date: Wednesday, February 18, 2026 8:50:37 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Spokane needs green spaces that aren't just parks. Urban areas need connected green spaces within urban areas to allow for all manner of animals from birds, insects and mammals to safely move through our city and into the environs beyond. A

People living in the city needs green spaces they can walk through. It is important for our mental health. B

Impervious spaces need to be minimized to protect our aquifer and our water quality from run off. Maintaining large canopy trees can assist with this goal as well as provide the necessary habitat for species living in our urban area or migrating through. C

Eliminating environmental procedures to fast track urban growth initiatives is short sided and not in the interest of Spokane's long-term livability for all of its residents - people and animal. D

From: Carol Ellis
To: Plan Spokane
Subject: Plan Spokane 2046 Draft EIS Comments
Date: Tuesday, February 24, 2026 7:30:15 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I favor Plan 2 primarily because its Housing component is NOT downtown, but on Transit Corridors. A

Why: 1 It matches the dispersed model of services for low income people.

2 Fits regarding real estate downtown: high price to renovate (as Chancery Bldg), & high income buyers (Stone tower).

3 Federal incentives have evaporated, so we must rely on City and State incentives to develop affordable housing.

A question: can any of the unoccupied office spaces downtown be converted to middle income housing? Can that feature be incorporated into Plan 2? B

Carol Ellis
2973 S Waterford Dr.
Spokane WA 99203

From: Leah Erickson
To: Plan Spokane
Subject: Response / Comment
Date: Thursday, March 5, 2026 9:35:45 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I like alternative 2. | A

I would not want additional fees to be added to use green spaces and parks in the city. These should be free use areas for the community. | B

I like alternative 3 for the additional job creation. However, I do not like the transportation plan on that one via looking at the maps. I prefer alternative 2 for that portion of the plans. | A

3 biggest concerns for me are water use, transportation plans, and pollution of all kinds. | C

Affordable Housing and Land Use are also in my mind as the next most concerning.
Sent from my iPhone

From: Catherine Ferguson
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 8:10:22 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

In collaboration with Spokane 350, I strongly prefer Alternative 3 as the City's selected growth alternative. This support is conditioned on the EIS adequately evaluating cumulative environmental impacts at the comprehensive plan level and ensuring that those impacts are avoided or mitigated through adopted development regulations, consistent with SEPA. A, B

-Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits A

-The City is considering expanded use of SEPA infill and housing exemptions. I urge the City to establish clear guardrails before broadly applying exemptions, including completing an inventory of existing urban natural assets - such as tree canopy, habitat value, and ecological connectivity. C, D

I oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods as shown in Exhibit 7. E

I support environmental review exemption only if the proposed development area is 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces.

Thank you for your consideration and for preserving our earth...

Catherine Ferguson

Spokane 99201

From: Francesca Firstwater
To: Plan Spokane
Subject: PlanSpokane2046DraftEIS Comments
Date: Monday, February 16, 2026 3:48:01 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

To whom it may concern, I have tried to gather some understanding of how this plan affects my neighborhood and do have concerns. My address is 122 W Euclid Ave, 99205. We already have had difficulties with traffic safety on the Euclid hill and Cora corridor due to large traffic input on weekends with churches on the corridor and are wondering how placing many more rental units in the neighborhood will affect the traffic patterns. The Euclid hill has major safety hazards with pouring out on to Division in both directions and is not navigable in snow and ice causing multiple accidents over the years. Directing traffic out on Post creates a similar backlog and/or hazard going north on a hill. Putting more rental units and removing single owner housing, compounds the problem. Can't some of these units be located out directly on empty lots on Division and create more mixed neighborhood friendly environments like those of South Perry and North Monroe?
Sincerely, Francesca Firstwater

A

B

From: MFA Spokane
To: Plan Spokane
Subject: lanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 8:58:33 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Chantelle Flint
Cliff/Cannon Neighborhood

From: ROBERT FLOWERS
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Sunday, February 15, 2026 9:16:46 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

My Preferred Spokane City 2046 Draft Alternative is: **Alternative 3 - Center City and Regional Hubs.** This alternative provides the most efficient use of public funds and land available for higher density developments and allows the use of existing or improved transit for public transportation. A

Significant improvements in vehicle movement within these areas, however, should not be overlooked. Assuming new residents will use transit may prove to be a bad assumption leading to increased traffic congestion and pollution unless significant reworking of existing roadway access and transit facilities aimed at rideship quality are implemented. It is still "the bus" in Spokane and lacks the appeal of a light rail system (which Spokane has squandered the possibility of installing economically) and will take some convincing of the public to use at scale. B

Very high density housing should be focused downown with necessary supporting businesses, especially grocery and pharmacy, encouraged. Look to other cities in the PNW with high density residential in the city core and how they have managed inner-city transportation (i.e., Portland - fareless square). C

Existing neighborhood livability sould be maintained at all costs. Don't make the mistake of assuming higher density will be received in existing neighborhoods without legal repercussions. Treat current homeowners with respect and involve them in any change in their neighborhood well before changes are made. Eliminate the "good-ole-boy" attitude the city has toward developers and require them to complete the full range of obligations to develop - we are still waiting for the promised sidewalks on South Upper Terrace between E 17th and South Rockwood Blvd while the developer contiues to build multi-million dollar homes. Get real and start being fair. D E

Robert Flowers

From: Merry Fougere
To: Plan Spokane
Subject: Draft EIS comments
Date: Monday, February 16, 2026 11:27:01 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 below. B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 below shows all neighborhoods will be exempted from environmental review in two phases. C

4. Suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces included below.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

Merry Fougere
1823 south mount Vernon street 99233
merrieux@mac.com

Sent from my iPhone

From: Jim Frank
To: Plan Spokane
Cc: Black, Tirrell
Subject: Plan Spokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 5:22:49 PM
Attachments: Spokane_2046_Draft_EIS_FULL_Integrated_Comment_Letter.pdf

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hi Tirrell….this is a summary of some of my comments. I will send another series of comments by separate cover. This is very complicated and it was difficult to get everything I wanted to say in a single documents. Sorry if this is a bit confused.

Thanks, Jim

Jim Frank

1335 W. Summit Parkway

Spokane, WA 99205

jfrank@greenstonehomes.com

February 14, 2026

Re: Comments on the PlanSpokane 2046 Draft Environmental Impact Statement

I appreciate the significant effort undertaken in preparation of the Draft Environmental Impact Statement (EIS). The attached series of comments address economic feasibility, subsidy efficiency, tenure equity, transportation performance, and alternatives adequacy under SEPA. The Draft EIS evaluates corridor-focused density alternatives but does not adequately analyze cost structure, ownership opportunity, distributed mixed-use growth patterns, or whether a reasonable Neighborhood Mixed-Use alternative should be evaluated. A

The Draft EIS appears to assume that increasing zoning capacity for high-density multifamily development will inherently produce improved affordability outcomes. However, the document does not provide sufficient comparative economic analysis to support that conclusion within Spokane's land value context. B

I have prepared a series of comments to address selected areas within the EIS. Many of these area are by necessity interrelated so I apologize for any redundancy.

1. Construction Cost Escalation and Affordability Assumptions C

Typical Spokane hard construction costs are approximately:

- IRC-scale middle housing (small lot detached, duplex, cottage cluster, townhome): ~$175 per square foot
- Garden-style apartments (2–3 story wood frame): ~$300 per square foot
- 3–5 story podium or structured construction: ~$400 per square foot

Spokane land values generally range from $20–30 per square foot, or approximately $1.09 million per acre at midpoint. While increased density reduces land cost per unit, the reduction is modest relative to the escalation in structural and code-triggered construction costs.

For a 1,000 square foot unit, estimated hard construction costs are approximately $175,000 for IRC-scale housing, $300,000 for garden apartments (+$125,000), and $400,000 for

podium construction (+$225,000). Even accounting for land cost reductions at higher densities, total development cost rises substantially as density increases. C

The Draft EIS does not include comparative total development cost analysis by typology, nor does it model subsidy gap per unit across alternatives. Without this analysis, the assumption that corridor-focused density produces superior affordability outcomes remains unsupported.

2. Subsidy Efficiency and Fiscal Impact

D

Affordable housing below 80% of Area Median Income typically requires public subsidy. As total development cost increases, required loan amounts increase, debt service increases, and the subsidy gap per unit expands. In Spokane's land value context, higher-density podium construction is likely to require significantly greater public subsidy per unit than IRC-scale housing.

The Draft EIS does not evaluate affordability outcomes per public dollar invested. Fiscal efficiency is a relevant environmental and policy consideration and should be analyzed.

3. Tenure Equity and Ownership Opportunity

E

The Draft EIS evaluates unit counts and density but does not evaluate tenure outcomes (ownership versus rental). Higher-density multifamily development is predominantly rental in structure. IRC-scale middle housing forms can provide fee-simple or condominium ownership opportunities.

Homeownership remains the primary mechanism for household wealth creation and intergenerational mobility. A strategy concentrating affordable production in rental-only formats may limit ownership opportunity for lower-income households and reduce tenure diversity.

4. Omission of a Neighborhood Mixed-Use Alternative

F

Action Alternatives 1, 2 and 3 focus growth along arterial corridors and designated centers. This reflects a high-density corridor growth premise. However, the Draft EIS does not evaluate a distributed Neighborhood Mixed-Use alternative.

A Neighborhood Mixed-Use zone could:

- Allow middle housing throughout most neighborhood interiors by right
- Permit neighborhood-scale retail and services
- Encourage live-work units and small commercial nodes
- Promote walkability and internal trip capture
- Distribute growth rather than concentrate it along arterials

5. Transportation Performance and Research Support

G

Transportation research consistently demonstrates that walkable neighborhood scale mixed-use environments reduce vehicle trips and vehicle miles traveled (VMT).

Relevant research includes:

- Ewing & Cervero (2010) meta-analysis linking built environment factors to reduced VMT.
- U.S. EPA (2013) documentation of trip reduction through mixed-use internal capture.
- Congress for the New Urbanism studies indicating 20–40% VMT reduction in walkable mixed-use areas.

The Draft EIS does not analyze whether distributed neighborhood mixed-use zoning could achieve comparable or superior VMT reductions relative to corridor-focused density.

6. SEPA Alternatives Adequacy

H

Under SEPA, an EIS must evaluate reasonable alternatives capable of achieving project objectives. A distributed Neighborhood Mixed-Use alternative represents a feasible growth strategy that is not analyzed. Failure to evaluate this alternative may leave the range of reasonable alternatives incomplete.

Requested Additional Analysis

I

The Final EIS should include:

- Comparative development cost modeling by housing typology
- Subsidy gap per unit analysis
- Affordable units per public dollar comparison
- Ownership vs rental tenure modeling
- VMT modeling for distributed mixed-use scenario

Conclusion

J

Density alone does not guarantee affordability. In Spokane's land cost environment, construction cost escalation associated with high-density multifamily development may increase subsidy requirements while limiting ownership opportunity. A distributed Neighborhood Mixed-Use strategy may better achieve affordability, transportation efficiency, and equity objectives.

Jim Frank

K

Technical Appendix: Cost and Density Comparison

Key Assumptions:

- Land value: $25/sf (~$1.09M per acre)
- IRC construction cost: $175/sf
- Garden apartment: $300/sf
- Podium construction: $400/sf
- Average unit size: 1,000 sf
- Net densities: Middle = 17 du/ac; Garden = 20 du/ac; Podium = 40 du/ac

This simplified comparison demonstrates that in Spokane's land value context, construction cost escalation substantially exceeds land savings achieved through increased density.

From: Jim Frank
To: Plan Spokane
Cc: Black, Tirrell
Subject: Plan Spokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 5:27:26 PM
Attachments: City Spolkane Housing Target.docx
Jim_Frank_Supplemental_Comments_PlanSpokane_2046_Draft_EIS.docx
Spokane_HB1220_EIS_Comment.docx
Spokane_Draft_EIS_Comment.docx
Spokane_EIS_Neighborhood_Mixed_Use_Comment.docx

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Tirrell….these are the additional comments I am providing. In an additional message I am providing additional documentation to support my comments.

Thanks, Jim

Housing Allocation Methodologies and Spokane County Method A Prime Analysis

L

It does not appear that the city is using the housing allocation approved by the Board of County Commissioners and recommended by the SCEO. The city appears to using housing allocation numbers based upon a PTAC recommendation that was never approved. The PTAC recommendation radically altered the housing allocation and is a significant deviation from the information presented to the public, SCEO and the BOCC.

1. Overview of Approved HAPT Methodologies

The Washington State Department of Commerce's Housing for All Planning Tool (HAPT) provides three primary methodologies for allocating projected housing need among jurisdictions within a county.

Method A – Proportional Growth Share

Allocates housing need based on each jurisdiction's share of projected population growth.
Formula: Countywide Housing Need × Jurisdiction Population Growth Share.
This method aligns housing allocations with adopted Countywide Planning Policies and Urban Growth Area (UGA) growth targets.

Method B – Equalized Total Housing Supply by Planning Horizon

Allocates housing so that by the end of the planning period each jurisdiction holds the same proportional share of total housing supply at each income level.
This method considers existing housing stock plus projected growth and aims to normalize distribution of housing types across jurisdictions.

Method C – Targeted Geographic Allocation

Builds on Method A's proportional structure but allows geographic targeting of certain housing types, particularly lower-income units, toward Urban Growth Areas or jurisdictions with infrastructure capacity.

2. Spokane County Adoption of Method A Prime

Spokane County adopted a variation of Method A referred to as "Method A Prime." While maintaining the proportional allocation structure modifications were made to reflect local conditions. In the September 25, 2024, PTAC staff report recommending Method A prime the reports states "Method A Prime uses the same assumptions and calculations as Method A but allows a distinction between rural County lands, unincorporated UGAs and incorporated jurisdictions". One of the "Pros" for the A Prime methodology was that it reserves lower income housing for urban areas. After a public hearing the housing allocation was approved by the SCEO and recommended to the Board of County Commissioners on September 25, 2024. On January 21, 2025, by resolution number 25-

L

0033, the Board of County commissioners approved a housing allocation to each jurisdiction and it was accompanied by an exhibit that documented the allocation to each jurisdiction. See Appendix A.

3. PTAC Recommendation Regarding Housing Share

Subsequent to the Board action, on January 21, 2025, PTAC recommended a change in the Method A Prime methodology. They recommended that the HAPT input be "housing share" rather than "population share. One would expect "housing share" would not materially deviate from "population share". The input variables used by PTAC materially altered housing allocation outcomes.

Using "housing growth" share instead of population growth share, and whatever other formula modifications made by PTAC, the HAPT Prime A methodology produced significantly different results:

- Increased allocation to rural Spokane County from 3,534 units to 6,195 units (+75%)
- Reduced allocation to urban Spokane County from 22,946 units to 17,142 units (-34%)
- Reduced allocation Airway Heights from 5,007 units to 3,055 units (-27%)
- Reduced allocation to Liberty Lake from 6,601 units to 5,180 units (-27%)
- Increased allocation to City of Spokane from 17,550 units to 22,359 units (+27%)

This divergence decouples housing allocation from adopted population growth targets and may create tension with Growth Management Act principles emphasizing urban concentration, infrastructure efficiency, and reduction of sprawl. For example, rural Spokane County has a population allocation of 4,708 persons but is being allocated 6,195 housing units. This promotes sprawl in conflict with adopted County Wide Planning policies.

This policy recommendation from PTAC was never approved by SCEO or acted upon by the Board of County Commissioners.

4. Draft EIS Impact

It appears that the City of Spokane is not using the using the housing allocation as approved by the Board of County Commissioners resolution no. 25-0033, but rather the PTAC recommended change in data input. The EIS should be modified to reflect the proper housing allocation as approved by the Board of County Commissioners.

M

EIS Comments Related to Housing Capacity, Speculative Land Pricing and Displacement Risk

Introduction

This supplemental comment focuses on feasibility assumptions, land capacity modeling, speculative pricing effects, displacement risk, infrastructure concentration impacts, and alternatives adequacy under SEPA. While the Draft EIS evaluates zoning capacity and projected unit yield, it does not sufficiently analyze whether that capacity is economically feasible or how corridor-focused upzoning may distort land markets.

1. Feasible Capacity vs. Theoretical Zoning Capacity

The Draft EIS appears to equate zoned capacity with likely production. However, zoning capacity does not automatically translate into economically feasible development. Market absorption, construction cost thresholds, financing constraints, and rent supportability determine whether projects are built.

A significant portion of Spokane's remaining land capacity consists of:

- Underdeveloped land parcels
- Underutilized land (single-family or low-intensity uses on land zoned for higher density)

Redevelopment of underutilized parcels requires land acquisition at prices reflecting redevelopment potential, not existing use value. This increases land basis cost and undermines simple capacity assumptions.

2. Speculative Land Pricing and Corridor Upzoning

Upzoning concentrated along specific arterial corridors can lead to speculative land pricing. There is already observable pricing pressure along corridors such as Division, Hamilton, Monroe and 29th.

When landowners price property based on anticipated future density, land values increase ahead of development. Higher land basis directly increases total project cost and undermines affordability outcomes.

The Draft EIS does not analyze the impact of corridor upzoning on land speculation, nor does it evaluate whether speculative pricing may offset intended affordability gains.

M

3. Displacement Risk and Concentration of Redevelopment Pressure

A substantial portion of Spokane's identified underutilized redevelopment capacity is located in historically lower-income neighborhoods, including West Central, East Central, Emerson Garfield and Hillyard. These neighborhoods contain a significant share of older housing stock, small commercial properties, and parcels zoned for higher density than currently built.

Corridor-focused upzoning and redevelopment incentives are therefore likely to concentrate redevelopment pressure in precisely those areas where land values remain comparatively lower and acquisition is more feasible. This creates a material risk that:

- Naturally occurring affordable housing (NOAH) will be demolished;
- Existing low-income renters will be displaced;
- Small neighborhood-serving businesses will be replaced by higher-cost redevelopment;
- Higher-income in-migrants will capture redevelopment benefits while existing residents bear disruption costs.

If higher-density redevelopment replaces older, lower-cost housing with substantially more expensive new construction, the net affordability impact may be neutral or even negative for existing residents.

The Draft EIS does not provide parcel-level demolition likelihood analysis, displacement modeling, or cumulative redevelopment pressure assessment in these neighborhoods. Nor does it evaluate whether concentrating growth in historically lower-income areas disproportionately shifts redevelopment burden onto vulnerable communities.

Housing equity requires that affordable housing opportunities and redevelopment capacity be equitably distributed across all neighborhoods in Spokane—not disproportionately located in neighborhoods that are already lower income.

The Final EIS should include:

- Neighborhood-level displacement risk analysis;
- Identification of naturally occurring affordable housing at risk of demolition;
- Comparative evaluation of redevelopment pressure across income geographies;
- Assessment of whether affordable housing production is equitably distributed citywide.

Conclusion

Zoning capacity alone does not ensure feasible or affordable housing production. Speculative pricing, redevelopment land basis, displacement risk, and infrastructure concentration should be fully evaluated before selecting a preferred alternative.

N

Draft EIS Comment
City of Spokane Comprehensive Plan Update

Comment on Growth Strategy, Land Capacity Assumptions, and Market Feasibility

The Draft Environmental Impact Statement (EIS) relies heavily on the assumption that Spokane's Centers & Corridors growth strategy—and its proposed intensification—will generate sufficient housing capacity to accommodate projected growth. However, both empirical growth patterns and the City's Land Capacity Analysis (LCA) raise substantial questions about whether this assumption is realistic.

1. The LCA Relies Primarily on Redevelopment

The 2025 Land Capacity Analysis identifies approximately 30,117 units of theoretical housing capacity. Of that total, approximately 10,344 units (34%) come from vacant land, while approximately 19,774 units (66%) depend on redevelopment of partially used or underutilized parcels, including corridor sites and the South Logan TOD subarea.

This means roughly two-thirds of projected housing capacity assumes redevelopment rather than development of vacant land. Redevelopment capacity is inherently less certain because it depends on willing sellers, financial feasibility, parcel assembly, demolition, environmental remediation, structured parking, infrastructure upgrades, and market rents sufficient to justify higher construction costs.

2. Comparative Regional Growth Raises Performance Questions

Over the last decade, the City of Spokane has grown at a slower rate than Spokane County overall and slower than Kootenai County, Idaho. A substantial share of regional housing growth has occurred in areas where development takes place primarily on vacant land rather than through corridor-based redevelopment. This raises a critical question: What evidence supports the assumption that increasing reliance on redevelopment will produce materially different results over the next 20 years?

3. Structural Cost Differential: Redevelopment vs. Greenfield Development

Redevelopment in corridor environments is materially more expensive than development on vacant land due to existing-use land acquisition costs, demolition, structured parking requirements, frontage improvements, utility relocation, tenant displacement mitigation, and greater financing risk. Affordable housing projects subject to prevailing wage and Evergreen standards often exceed $500 per square foot, increasing subsidy requirements.

By contrast, development on vacant land or small-scale neighborhood infill typically avoids demolition costs, allows surface or no parking, and can be delivered at lower per-unit costs. The has been clearly demonstrated for example in the Highland Village neighborhood

N

where Habitat and Community Frameworks, working with Greenstone have delivered over 100 affordable middle housing units with very modest subsidy.

4. Speculation and Land Pricing Effects

Upzoning limited corridor parcels without demonstrated redevelopment feasibility can increase land speculation, raise acquisition costs, encourage land banking, and reduce turnover. When land is priced based on theoretical mid-rise capacity but rents do not support those construction costs, projects stall. The EIS does not evaluate this risk.

5. Displacement and Equity Impacts

Much of the identified underutilized land capacity is located in historically lower-income neighborhoods such as West Central, East Central, and Hillyard. Because the LCA relies heavily on redevelopment in these areas, the strategy carries inherent displacement risk, including removal of naturally occurring affordable housing and increased land values. The EIS does not adequately analyze these risks.

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Additional Comment: Compliance with HB 1220 – Planning for Housing in All Income Bands

HB 1220 requires jurisdictions to plan for and accommodate housing affordable to all economic segments of the community. The Draft EIS does not adequately evaluate whether a redevelopment-dominant growth strategy is consistent with these statutory requirements.

1. Redevelopment Raises Per-Unit Costs Across Income Bands

Because redevelopment sites are more expensive and complex to develop, higher per-unit costs reduce the number of affordable units that can be delivered with available subsidy funding. The EIS does not analyze how these cost factors affect production in the 0–50% AMI and 50–80% AMI income bands.

2. Moderate-Income Housing (80–120% AMI) Risks

Moderate-income housing often relies on lower-cost construction types such as duplexes, fourplexes, townhomes, and small-scale mixed-use infill. A corridor redevelopment strategy dependent on mid-rise construction may struggle to produce housing affordable to this income band without subsidy.

3. Geographic Equity and Distribution

If redevelopment capacity is concentrated in historically lower-income neighborhoods, the strategy risks reinforcing geographic concentration of affordable housing. The EIS should evaluate whether affordable housing opportunity is equitably distributed across neighborhoods.

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4. Capacity vs. Deliverability

The existence of theoretical redevelopment capacity does not guarantee production. Because redevelopment is more expensive and financially complex, a redevelopment-heavy strategy may reduce total deliverable units, increase reliance on limited public funding, and slow production rates.

Requested Additional Analysis

To ensure compliance and realistic growth planning, the Final EIS should include:

1. A market feasibility analysis by income band.
2. Evaluation of subsidy capacity relative to redevelopment costs.
3. A geographic equity and displacement risk analysis.
4. Comparison of redevelopment-heavy growth versus broader neighborhood mixed-use growth.

Conclusion

The Draft EIS assumes that redevelopment-based capacity will materialize at a scale not demonstrated over the past decade. Given that approximately two-thirds of projected housing capacity depends on redevelopment, additional analysis is necessary to ensure feasibility, equity, and compliance with housing planning requirements.

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Draft EIS Comment
Inadequate Range of Alternatives – Failure to Evaluate a Broad Neighborhood Mixed Use Strategy

The Draft Environmental Impact Statement does not appear to evaluate a broadly distributed "Neighborhood Mixed Use" growth strategy as a reasonable alternative to continued reliance on a Centers and Corridors intensification models. All three alternatives analyzed retain the fundamental structural approach of concentrating increased density primarily within designated centers and arterial corridors. While the degree of intensification varies, the underlying development pattern remains corridor-focused.

The EIS does not analyze a materially different land use strategy in which large portions of existing Low Residential and Medium Residential zones are rezoned to a Neighborhood Mixed Use designation calibrated to middle housing scale. Such an approach would distribute growth across neighborhoods rather than concentrating redevelopment pressure along arterial corridors.

1. Requirement to Evaluate Reasonable Alternatives

Under SEPA, an EIS must evaluate a reasonable range of alternatives capable of achieving the proposal's objectives. A broadly distributed Neighborhood Mixed Use strategy could increase overall housing capacity, distribute growth geographically, reduce redevelopment pressure in lower-income corridors, lower per-unit construction costs, reduce land speculation, and improve walkability within neighborhoods.

Because such a strategy represents a fundamentally different land use pattern, it qualifies as a reasonable alternative that should be evaluated. Instead, the Draft EIS analyzes variations of the same corridor-centered framework.

2. Infrastructure and Transportation Implications

A corridor-intensification model assumes high concentrations of traffic along arterial streets, increased need for signalization and intersection upgrades, and greater localized utility capacity upgrades. By contrast, a distributed neighborhood mixed-use model would likely spread trip generation across a broader street network, reduce peak corridor congestion, and allow incremental infrastructure improvements. It has been documents that neighborhood based walkable mixed use can reduce vehicle trip by 30%. The development patterns over time lead to density that supports broader transit reach and service.

The EIS does not compare these infrastructure and transportation impact differences between a corridor-focused model and a broadly distributed mixed-use model.

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3. Housing Form and Market Feasibility Differences

Corridor-focused intensification often assumes mid-rise or podium construction types requiring higher land acquisition thresholds, structured parking, parcel assembly, and higher rents to achieve feasibility. A neighborhood mixed-use zoning framework calibrated to middle housing scale would allow incremental infill, participation by smaller developers, lower per-unit construction costs, and greater feasibility for moderate-income housing.

The Draft EIS does not evaluate whether a distributed middle-housing model could achieve housing targets with lower per-unit costs and greater market deliverability.

4. Equity and Geographic Distribution

Because identified underutilized land is disproportionately located in historically lower-income neighborhoods, a redevelopment-dependent corridor strategy may concentrate redevelopment pressure in those areas. A broadly distributed Neighborhood Mixed Use strategy would expand housing opportunity into higher-income neighborhoods and reduce concentration of affordability.

The EIS does not evaluate these geographic equity implications.

5. Land Speculation Risk

When growth capacity is concentrated in limited corridor areas, remaining vacant or underutilized parcels become speculative assets, and land pricing reflects theoretical buildout potential. A distributed rezoning approach would increase the supply of developable parcels across the city, potentially moderating speculative land pricing pressure. The Draft EIS does not analyze this dynamic.

6. Displacement Risk

When growth is concentrated in redevelopment areas there is a higher risk of displacement as existing affordable housing is demolished to facilitate the new higher intensity development. This is a very real risk in neighborhoods like West Central, East Central, Emerson Garfield and Hillyard where significant large single-family neighborhoods have been zoned for High Density residential development and classified in the LCA as "underutilized" land. The EIS does not analyze this risk.

Requested Revision

The Final EIS should evaluate an alternative that rezones substantial portions of Low and Medium Residential areas and existing single family neighborhoods zoned for high density development to a calibrated Neighborhood Mixed Use designation, allows middle housing at scale citywide, reduces reliance on corridor mid-rise redevelopment, and compares infrastructure, displacement, feasibility, and equity outcomes against the corridor-centered alternatives.

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Without analysis of a materially different land use framework, the EIS does not provide decision-makers with a full understanding of reasonable growth strategies available to the City.

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Draft EIS Comment
HB 1220 Compliance – Housing in All Income Bands

HB 1220 requires jurisdictions to plan for and accommodate housing affordable to all economic segments of the community. This includes identifying sufficient land capacity and adopting regulatory strategies that realistically enable housing production across all income bands. The Draft Environmental Impact Statement does not adequately evaluate whether a redevelopment-dominant growth strategy is consistent with these statutory requirements. The EIS identifies three plan alternatives:

Alternate 1: The current Comprehensive Plan, adopted in 2017, is based upon concentrating development in "center and corridors". Under Land Use Goals and Policies 3.3 the plan directed: "Much of the future growth should occur within concentrated areas in and around Neighborhood Centers, District Centers, Employment Centers and Regional Centers as designated on the land use map."

Alternate 2: This is called the "distributed and balanced" alternative but is follows the same concentrated development vision of Alternate 1. In the EIS summary is states "Alternate 2 adds greater job and housing intensity along ***frequent transit routes*** and applies the recommendations of the Centers and Corridors Study (2024). The study maintains the vision of concentrating development is existing commercial centers and along major arterials along with renaming the CC zones to mixed use nomenclature. This plan alternative does not envision a "neighborhood mixed use" environment where existing low and medium density areas would be rezoned to mix us to encourage middle housing and neighborhood scale commercial use expansion into all neighborhoods enhancing neighborhood walkability.

Alternate 3: The alternate is called City Center and Regional Hubs. This alternative is again a variation of the current centers and corridors plan and focuses development in the downtown core and the larger regional centers.

1. Redevelopment Raises Per-Unit Costs Across Income Bands

As demonstrated in the Land Capacity Analysis, approximately two-thirds of projected housing capacity depends on redevelopment of partially used or underutilized land. Redevelopment sites typically involve acquisition of improved property, demolition, structured parking, greater entitlement risk, and higher infrastructure costs. These factors materially increase per-unit development cost compared to housing constructed on vacant land or small-scale neighborhood infill. All three proposed alternatives focus concentrated growth in existing commercial centers and high traffic corridors. The are primarily redevelopment locations since they contain little "vacant" land.

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The dense concentrated housing in center and corridor locations will have construction costs of $300-$400 per square foot. For affordable housing projects receiving public funding, prevailing wage and Evergreen requirements further increase total development cost, often exceeding $500 per square foot. Higher per-unit costs reduce the number of affordable units that can be delivered with available subsidy funding.

2. Moderate-Income Housing (80–120% AMI) Risks

Moderate-income housing typically relies on construction types and land costs that allow projects to pencil without deep subsidy. Small-scale neighborhood mixed-use, duplexes, fourplexes, and townhomes can often be delivered at lower per-unit cost. By contrast, mid-rise corridor redevelopment with structured parking frequently requires rents above what moderate-income households can afford. A redevelopment-heavy strategy may therefore underperform in the moderate-income bands.

3. Geographic Equity and Distribution Requirements

State housing policy calls for avoiding concentrations of low-income housing and increasing access to affordable housing in areas where it is currently lacking. If redevelopment capacity is concentrated in historically lower-income neighborhoods, the strategy risks reinforcing geographic concentration of affordability rather than distributing housing opportunity equitably across all neighborhoods. All of the current alternative have concentrated development in the low income West Central, Emersons Garfield, East Central, and Hillyard neighborhoods.

4. Capacity vs. Deliverability

The existence of theoretical redevelopment capacity does not guarantee production. Because redevelopment is more expensive and financially complex than neighborhood infill or development on vacant land, a redevelopment-heavy strategy may reduce total deliverable units, increase reliance on limited public funding, and slow production rates. The Final EIS should evaluate realistic production feasibility by income band under current and reasonably foreseeable market conditions.

Requested Additional Analysis

To ensure compliance with HB 1220, the Final EIS should include:

1. A market feasibility analysis by income band comparing redevelopment typologies to neighborhood mixed-use typologies.
2. Evaluation of subsidy capacity relative to redevelopment costs.
3. A geographic equity analysis showing likely distribution of affordable housing.
4. Comparison of redevelopment-heavy growth versus broader neighborhood mixed-use growth in meeting income-band targets.

Conclusion

A growth strategy that relies primarily on corridor redevelopment rather than broader neighborhood mixed-use may increase per-unit housing costs, reduce deliverability in moderate and low-income bands, and risk geographic concentration of affordability.

Comment # 85

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Additional analysis is necessary to ensure that the preferred alternative complies with HB 1220 and produces housing outcomes consistent with state policy.

From: Jim Frank
To: Plan Spokane
Cc: Black, Tirrell
Subject: Plan Spokane 2046 EIS Comments
Date: Tuesday, February 17, 2026 5:50:23 PM
Attachments: Housing Policy Comment Letter.pdf
Comments to SCEO Related to the County Wide Planning Policies and Modification of the Urban Growth Boundary.docx
Comments on Racial and Economic Inequality in Housing.pdf
Residential Construction Costs by Unit Type.pdf
Comments on City LCA.docx

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Tirrell….These are documents submitted in support of the comments letter. Please consider these part of my subhmittal.

Thanks, Jim

Re: GMA Housing Policy
Land Capacity Analysis

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I have spent the past few month trying to understand the process we are going through as a community to plan for our growth and establish housing opportunity for the community over the next 20 years. The roadmap set out by State statute and the Department of Commerce is incredibly complicated and virtually impossible for the public to meaningly participate. It is very easy to get caught in the complexity of land capacity analysis; definitions of "underdeveloped" and "under-utilized" property; infrastructure gap analysis; achievable density; and housing income bands while losing sight of the vision we have for our community. The GMA process is about both where we will build our homes over the next 20 years and what kind of homes and neighborhoods we want for our families. The focus on the boundary and land capacity has resulted in an emphasis on density and little discussion on the kind of neighborhoods that allow families to thrive.

The Importance of Moderate Density Housing:

The guidance to the process from the Department of Commerce reflects their experience in providing affordable housing. They fund and support the development of large apartment projects. This reflects their experience and expertise. While this may be an efficient funding process it is a housing and community planning failure. Strong and resilient neighborhoods need diversity housing types at moderate density and finely integrated with close proximity to services. The same is true if we intend to provide opportunity for all families. This means we have a vision to support neighborhoods that are economically diverse; include a wide range of housing products; are mixed use in character; and walkable. The challenge is this requires a comprehensive change in development regulations. The walkable, housing diverse and mixed use neighborhoods you see in Kendall Yards and River District (Liberty Lake) were possible only because development code waivers and flexibility was provided in those jurisdictions. Here is the housing policy vision from Snohomish County which can serve as a template for Spokane County:

> *"The county and cities should implement policies that allow for the development of moderate density housing to help meet future housing needs, diversify the housing stock, and provide more affordable home ownership and rental opportunities. This approach should include code updates to ensure that zoning designations and allowed densities, housing capacity, and other restrictions do not preclude development of moderate density housing."*

The important elements of this policy vision are "moderate density"; "diversify the housing stock"; and "affordable home ownership and rental opportunities". From

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Commerce's perspective housing affordable to families making less that 80% of median income is only possible with MF rental apartments. This is not true. The private sector can built small attached or detached SF homes for a lower cost than Commerce funds large apartment projects. The problem is that development codes have minimum lot sizes and development dimensional standards (frontage, site coverage and setback requirement) that make the construction of small homes on small lot impossible. State law and some new development regulations are allowing 4-plex units and even 6-plex on a lot, but this serves primarily rental housing, not home ownership. Homeownership requires a platted lot to convey ownership (state law has effectively prohibited condominium units and other forms of common interest ownership). Affordable housing solutions go well beyond the "higher density" narrative.

The Lack of Land Inventory:

No single factor has driven up housing cost more that land prices. The lack of land that is "reasonably available for residential development" is critical in Spokane County and has led to rapidly increasing home prices. The median family home in Spokane County has risen dramatically in the past ten years, from under $200,0000 to over $400,000. Land prices in this same period have increased more than four-fold. Even in neighborhoods like West Central and East Central, lot prices alone are exceeding $200,000.



The Land Capacity Analysis recommended by Commerce is incredibly complex and systemically over estimates land that is “reasonably available for development”. Here is a breakdown of the process:

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Exhibit 1. Kitsap County LCA Process



Source: BERK, 2020.

Because of the complexity, jurisdictions have been short-cutting the process or eliminating steps. For example most jurisdiction are not completing an infrastructure “gap analysis” and are just assuming that all land can be serviced. Jurisdictions are not properly setting aside land for future roadways and public facilities like parks, schools and open space. Expansive definitions of “vacant Land”, “underdeveloped Land” and “under-utilized land” are being used that significantly overestimate the inventory of land

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that can be developed. If the region had a 20 year supply of land capable you would not have seen the rapid and dramatic increase in land and housing prices we are experiencing. There is a significance difference in the “theoretical” land inventory derived from the LCA process being used by local jurisdictions and actual market conditions.

The Consequence of Inadequate Housing and Land Inventory

The primary purpose of the Growth management Act and the imposition of a Urban Growth Boundary Is to limit “urban sprawl” and focus growth where infrastructure is currently available. In Spokane County, which shares a metropolitan area with Kootenai County, limiting growth within the restrictive GMA boundary has resulted in housing and commercial growth “leaking” to north Idaho. The consequence of a restriction on land inventory available for urban development in Spokane County is the shifting of growth to Kootenai County. A shift of 500 residential units a year (the actual leakage is likely much greater) from Spokane County to Kootenai County has very negative fiscal and environmental impacts.

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Comments to SCEO Related to the County Wide Planning Policies and Modification of the Urban Growth Boundary

Over the past 12 months we have provided a series of comments and documentation on important issues related to providing for adequate housing for our population and housing equity. The attached are some of the documents previously submitted.

As this process moves from policy guidance to the updating of comprehensive plans by each jurisdiction, we want to summarize the issue we think most important:

1. **While family size is decreasing due to a declining birth rate, household size is increasing.** You will find a census summary that documents this. The increasing household size is a result of housing cost so high that persons from different household are sharing housing. This reflects the desperate shortage and high cost of housing because of a lack of housing inventory.
2. **Home ownership rates are declining, and this is especially true for racial minorities**. Kootenai County is not seeing the same decline in homeownership being seem in Spokane.

3. **At the staff level (both local and state) a consensus has developed that the only way to providing housing for middle- and low-income families is to build apartments and rental housing.** The solution they offer to meeting housing demand is not providing more land for housing

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but increasing the density permitted on existing available land. This ignores several realities of new home development. These include the following:

a. **The cost of constructing housing escalates rapidly with the mass and scale of the building.** SF homes constructed under the IRC cost about half (cost per SF) of multistory apartment buildings built under the UBC. This is due to a wide range of access, fire safety, energy code and stormwater standards that are required under the UBC that are not required under the IRC.

b. **Significant opportunity to increase density exists in building SF homes if codes would permit the construction of "small homes on small lots".** Most local codes prevent or make the construction of small detached and attached SF homes very difficult and costly. This is the result of zoning standards like minimum lot sizes, street frontage requirements and restrictive site coverage standards. If SF homes were permitted on small lots, you can achieve net densities over 18 DU/acres. The reality is that the urban spawl which GMA is trying to reverse is all that is permitted by most codes with large minimum lot sizes.

c. **The emphasis on building more apartments is at the expense of homeownership and housing equity of low-income families and racial minorities.** Middle- and low-income families are given no housing choice but living in large apartment complexes that are not integrated into neighborhoods when affordable homeownership should

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and can be an option. This perpetuates the historic inequality in housing opportunity and in the case of our region is simply driving housing to Kootenai County with a significant fiscal impact of Spokane County jurisdictions. (We have documented the construction cost differential, the shift in building permits to Kootenai County and the fiscal impact in the attached documents).

This is an issue that needs to be addressed by the Growth Management Steering Committee and the Board of County Commissioners.

4. **PTAC has recommended a procedure for the allocation of housing units that is not based on population** but what they call "housing growth". This has not been acted on by either SCEO or the Board of County Commissioners and results in a serious misallocation of housing within the County. The PTAC recommendation, when compared to a population-based allocation, increases the housing allocated to the City of Spokane and rural Spokane County, and decreases the allocation to Unincorporated Spokane County and most of the smaller cities. The details of the PTAC recommendation and the shift in housing allocation is in our documents. **This policy recommendation should be rejected. As we have documented, the city of Spokane is the local jurisdiction least capable of providing new housing and doubling the housing allocation to rural Spokane County is contrary to the County wide Planning Policies the SCEO has already adopted.**

5. **The City of Spokane has grossly overestimated the amount of land reasonably available for residential development in the LCA** submitted. The city has ignored many of the requirements outlined in the Burke Consulting (Commerce contractor) on the process to be used in the preparation of an LCA. The deficiencies have been documented in the material we have submitted for the record. **This is important since land cost is the principal driver of higher housing costs and the current lack of land inventory in Spokane is driving housing to outlying areas and Kootenai County**. The City of Spokane in 2025 has the lowest number of single-family home construction permits in over 15 years with a mere 120 SF permits issued thru the end of November (Documentation of provided in our submittals). The lack of housing construction in the City of Spokane has been the primary cause of increasing regional housing costs. We recommend that the County reject the City of Spokane LCA.

6. The misguided emphasis on apartments as the only way to provide affordable housing and the lack of reasonably available land for residential development is **limiting housing options for low- and middle-income family.** Maybe more importantly it is diving residential development to Kootenai County which **subverts the purpose of an Urban Growth Boundary**. This impact is well documented in the submittals we have made.

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Greenstone
ENRICHED LIVING. LASTING VALUE.

July 22, 2025

City of Spokane Plan Commission
Racially Disparate Impact on Housing

Ezra Klein and Derek Thompson's recent book *Abundance* documents the national housing crisis that has been decades in the making. After years of inadequate construction and policy inaction, we now face a severe shortage of affordable housing in Spokane. Our city has failed to build enough housing to keep pace with a growing population, leading to skyrocketing prices and rents. For middle- and low-income families, owning or renting a home is increasingly out of reach. The are many regulatory policies, engineering standards, and development code provisions that have in the past and continue to discriminate against lower income and racial minority populations.

The central question we must ask is: How can we foster a political and cultural environment where housing is built at a scale and pace that ensures affordability and abundance for all? Unfortunately, we have restricted the land available for new homes and there's a prevailing political belief that the only way to achieve affordability is by constructing more apartment complexes. However, this approach overlooks a key reality: as the mass and scale of buildings increase, so too do construction costs. Large apartment buildings, especially those aimed at middle- and low-income families, are not only costly to construct but often perpetuate inequality and restrict housing options. The assumption that apartments are the answer to housing affordability is misguided and must be challenged.

The real solution to housing affordability and equality—and the creation of livable, connected neighborhoods—lies in developing "middle housing." These are small homes, either attached or detached, on small lots, such as townhomes or small multifamily buildings (generally fewer than 12 units). Unlike larger apartment complexes, middle housing can be integrated into neighborhoods, preserving the character of communities while increasing housing stock and home ownership . While this approach sounds simple, it faces significant hurdles. Current zoning, and building regulations make it easier to develop large apartment complexes than to build small, affordable homes on smaller lots. This regulatory imbalance must be addressed. Here are a few critical areas:

1. **Land Capacity:** If there is insufficient land to build new homes prices will escalate rapidly. In 2021 the legislature passed HB1021 which required that each jurisdiction prepare a Land Capacity Analysis (LCA) to ensure that they have capacity to accommodate 20 years residential growth based upon population forecasts. The Spokane LCA claims to have land capacity far in excess of there required for 20 years growth, while the actual market conditions

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and land available for development tell a very different story. The burden of high land prices falls on racial minorities and low income families who's incomes do not keep pace with escalating land prices. Attached is a document that outlines the ways in which the Spokane LCA has overestimated land available for residential development.

2. **Zoning:** Spokane has zoned numerous low income neighborhoods (parts of West Central, East Central, Emerson Garfield, Logan and Hillyard) with fully developed single family neighborhood for high density MF development. Under GMA single family home neighborhoods with multifamily zoning are designated as "underutilized land" available for redevelopment. This is a policy that encourages the redevelopment of single family home neighborhoods and the displacement of existing residents who are primarily low income. This policy creates economic and racial segregation and inequity in housing.

3. **Home Ownership:** A regulatory and policy consensus has developed around the idea that housing affordability can only be developed around building more large apartments. This ignores the reality that housing construction costs increase rapidly with building mass and scale. See the attached documentation. For low income families small home on small lots (including SF attached and townhomes) are the most affordable option. Housing for all income bands should be affordable and located in connected neighborhoods. Restraining low income housing to apartments simply sustains housing inequality in our communities.

4. **Development Code Standards:** Dimensional standards (lot size, site coverage, building height, street frontage requirements) and complex long plat, short plat and unit lot subdivision requirements make the development of small home and middle housing very difficult and expensive. The very "middle housing" that we are trying to encourage is the most regulated and difficult to develop. These standards discriminate against small homes and small lots creating economic and racial inequality.

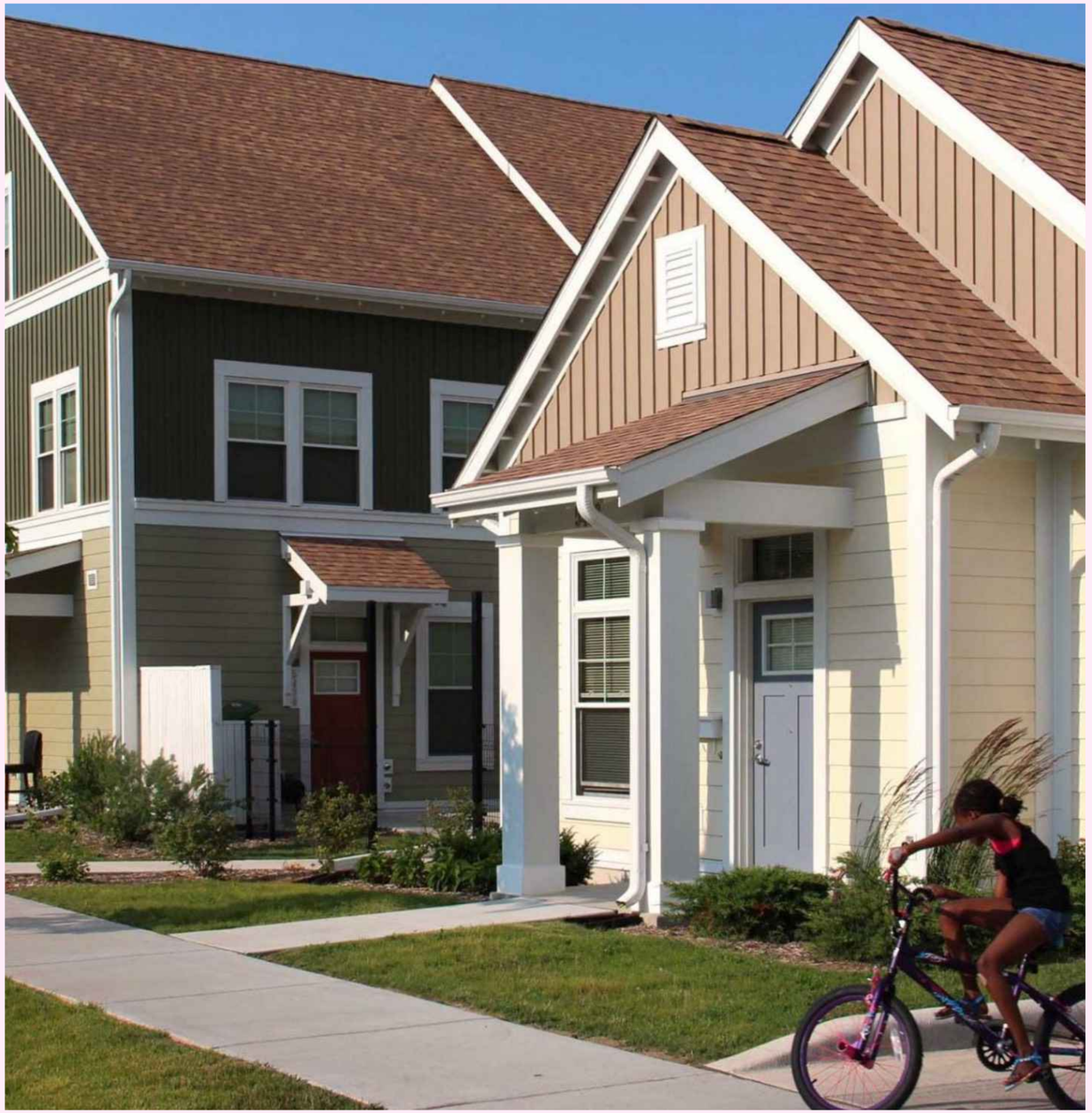
5. **Engineering Standards:** There are numerous engineering standards and fee structures that favor large homes on large lots at the expense of small homes. This includes stormwater review requirements, GFC fees, and Traffic impact fees. Fees are generally "one size fits all" rather than reflecting the lower service demand from smaller units. For example a small 1000SF home might pay the same GFC fee and traffic mitigation fee as a 3000SF home. The inequality in engineering standards and fees is systemic. Recent stormwater requirements place a significant burden on lower income home neighborhoods while higher income neighborhoods are allowed to meet significantly lower standards.

Addressing the significant regulatory imbalance that limits housing affordability for lower income families and racial minorities is very complex. It must begin with active listening to the low income families with few housing opportunities and those small market rate and nonprofit housing providers who struggle to meet this need.

Affordable Housing Options

Small Homes on Small Lots and Townhomes: The Prefferred Option for Affordable Housing in Low Income Bands

Housing for all income bands should be be affordable, resilient, and located in connected neighborhoods and communities.



Misconception: Apartments as the Preferred Housing Option for Low Income Bands

Apartments cost more to construct

Apartments have very long approval and construction lead times

Apartments are generally located in commercial high traffic and high land cost corridors

Apartment do not integrate finely into existing neighborhoods

Apartments sustain the housing inequality in our communities



Variable Housing Construction Costs

Development costs increase as mass, scale and complexity of the structure increases

- More complex construction systems
- Increased life safety and energy code requirement
- Fewer siting options and higher land costs
- More complex and fewer financing options
- Much longer entitlement and construction time frames



The Average Cost of Commerce Funded Apartment Projects: $475,000 per unit

Department of Commerce Housing Trust Fund Projects 2024

Small Homes Home on Small Lots Provide Best Option for Affordable Housing

Small homes and townhomes are the lowest cost housing option

On small lots single family homes can achieve MF density

Small homes have short construction lead times and are easier to finance than apartments

Small homes and townhomes easily integrate into existing neighborhoods



Clustered and Attached Single Family Homes

Achieve Net Density Similar to Apartment Projects

- SF Detached on 3000sf lots at 15 units/acre
- SF Attached on 2500sf lots at 18 units/acre
- Townhomes on 1500sf lots at 29 units/acre



Habitat Cottage Homes $280,000

Highland Village in Airway Heights 2025

- One and Two story Cottage Homes 1200-1400sf
- Lot Size 3000 SF
- Construction Costs $175/sf
- Total units developments costs about $280,000 per unit



1. Single Family Detached and Attached (three or fewer units):

- **Construction Cost: $175 SF**
- **Net Density Range: 12-18 DU/acre**

Construction under International Residential Code (IRC). Simplified building permit review. Plans can be pre-approved. Plans do not require licensed architect. No civil engineering or stormwater review required. Limited or no parking requirements, can take advantage of on street parking. Units can be finely integrated into most neighborhoods with SF or MF zoning providing greater choice and opportunity to families.

2. Attached Single Family, Townhomes, Small MF (four or more units):

- **Construction Cost: $225/SF**
- **Net Density Range: 12-22 DU/acre**

Four or more units are treated as commercial construction and are governed by the Uniform Building Code (UBC). Building plans must be submitted by licensed architect, civil engineering plans required, stormwater management plan required, units must be sprinkled, low frequency fire alarms are required, more stringent energy code and design review requirements. Generally can be integrated into most neighborhoods.

3. MF Construction Up to 4 Stories with Surface Parking:

- **Construction Cost: $300/SF**
- **Net Density: 30-50 DU/acre**

Construction is governed by UBC. Projects tend to be larger 40 or more units. Require detailed civil engineering plans for utilities, access and parking. Detailed stormwater engineering plans. Geotechnical soils analysis. SEPA review and traffic impact analysis. Elevators, hallways and secondary stairway systems. Development of detailed fire protection system and fire wall protections. More complicated appraisal and construction financing costs. Significantly longer development timelines and construction phase interest expense. Sites limited to MF zones with arterial access and not integrated well into neighborhoods.

4. Muilti Family Four or more Stories with Structured Parking:

- **Construction Cost: $400/ SF**
- **Net Density Range: 30-50 DU/acre**

Construction is governed by UBC. Projects tend to be larger 100 units or more. Require detailed civil engineering plans for utilities, access and parking. Detailed stormwater engineering plans. Geotechnical soils analysis. SEPA review and traffic impact analysis. Elevators, hallways and secondary stairway systems. Development of detailed fire protection systems and fire wall protections. More complicated appraisal and construction financing costs. Significantly longer development timelines and construction phase interest expense. Limited to high density MF zones in high land cost areas.

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Comments on City of Spokane Land Capacity Analysis

The Land Capacity Analysis submitted by the City of Spokane February 2025 is fundamentally flawed and does not reflect an inventory of land reasonably available for housing development during the 20-year study period. Rather the City of Spokane has created an inventory that grossly overestimates land available for housing development. The purpose of the LCA is to identify land likely to be available for residential development during the study period. Rather the city analysis included all land that could theoretically be developed as residential, even when such lands are not likely to be available for development during the study period.

A careful review of the City Land Capacity Analysis reflects the following:

1. **Infrastructure Gap Analysis**: The city did not identify lands subject to infrastructure gaps that will prevent the assigned densities from being achieved or will delay development during the planning period. RCW 36.70A.215 requires jurisdictions consider the lack of transportation and utility infrastructure in the land capacity analysis.
2. **Vacant Properties**: The city failed to consider where adjacent properties are owned by the same party the Assessor commonly assigns the full assessed value to only one parcel when in fact improvements are located on two or more adjacent parcels owned in common. A significant number of parcels have been identified as "vacant" when they in fact have substantial improvements and improved value.
3. **Partially Developed Properties:** The city has identified many properties as partially developed where they are not in a current residential use. This includes churches, cemeteries, schools and businesses where the zoning might permit residential use, but the current use is not residential.
   The city provided no mechanism to filter out properties where future residential use was unlikely.
4. **Underutilized Land**: The category includes parcels improved with single family homes but with zoning that permits higher intensity use. The city provided no analysis to assure that there was a strong possibility that the property would be redeveloped to a more intensive use in the planning period. The city has many inner-city SF neighborhood that are zoned for a more intensive use (West Central, Emerson Garfield, Hillyard and East Central) and there is no history of any significant redevelopment in these neighborhoods. Our survey of 800 homes in

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West Central zoned HDR showed only 3 that redeveloped in the past 20 years. This category includes almost 30% of the city estimated housing capacity.

5. **Critical Lands:** The city has not properly evaluated wetlands, floodplains, and geologic constraints that will limit development in the future. There are many environmental constraints that do not make development illegal but will significantly reduce the likelihood and density of development.
6. **Current Public Use Lands:** The city did not exclude lands owned by Federal, State, or local municipality or government that are not likely to be available for development in the planning period.
7. **Future Road ROW and Utility Land:** The city used a factor of 15% only on larger parcels as a reduction in land available for development. This grossly underestimates the land required for future development. Our analysis of over 30 projects shows the road and utility requirements to be in the range of 20-35%. ROW requirements for small projects are significant.
8. **Future Public Facilities:** The City made no attempt to identify the need for future public facility needs (open space, parks, schools, churches, fire stations, libraries and so forth) that will be required the planned population increase of 100,000 persons and make a deduction of land inventory for such uses.

From: Morna Gilbert
To: Plan Spokane
Subject: "PlanSpokane 2046 Draft EIS Comments".
Date: Thursday, March 5, 2026 10:14:00 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Having been residents of Spokane for over 50 years, our families find this plan to be a complete waste of time - waste of resources - and waste to our beautiful community. A
Why can't you focus on the common sense needs of our community?
The streets are horrid to drive on - the homeless make our city unlivable to those of us who WANT to be here and have invested in our community for years - what about OUR investment? B C
We are so fed up with the social issues pervading the REAL issues of LIFE in our community.
We definitely feel like YOU are FORCING us rather than serving us.

Watching our investments in the future of Spokane go down the drain because of short-sighted ideologies is a very sad scenario. D

The Gilbert's
Spokane, WA

From: Anthony Gill
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 11:18:52 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello, Spokane Planning team —

I wanted to write a quick note to thank you for your hard work on the CPPU (PlanSpokane) Draft EIS. I have a couple comments which, for simplicity, I want to summarize here:

1. Please ensure the FEIS and adopted growth strategy accommodates sufficient growth in high-resource areas like the South Hill. I'm very concerned that both Alternative 2 and Alternative 3 distribute too little housing growth in areas of high relative economic opportunity, like Manito, Lincoln Heights, Comstock, and Southgate. Instead, a substantial amount of growth is concentrated in places like downtown and Hillyard, which have disproportionately borne high environmental and economic burdens. As you know, HB 1220 requires planning for and accommodating housing at all income levels, and requires communities to identify policies that result in exclusion in housing. Too little growth being dedicated to high-resource areas could be seen as not adequately complying with HB 1220. The final EIS growth strategy should include additional growth corridors and nodes on the South Hill. A

2. Please ensure the FEIS and adopted growth strategy plans for (a) sufficient housing growth and (b) additional commercial opportunities in legacy R1 neighborhoods. It's important to recognize that the Centers and Corridors growth strategy which undergirded Spokane's original Comprehensive Plan centered growth on high-traffic, high-noise areas with significantly higher environmental burdens. There is substantial research showing that living in these places takes a toll on human health and increases risk of serious injury through traffic violence. In order to address this, and indeed, in order to ensure a high quality of life even for apartment-dwellers and renters, we need to allow more growth (even beyond that allowed through our middle housing code) outside of these busy arterials, in legacy R1 neighborhoods. Additionally, there is significant demand for additional retail opportunities, like cafés and corner stores, in these neighborhoods. Places like Doyle's and The Scoop are beloved community gathering places, and more neighborhoods across the city deserve the opportunity to enjoy them. Please ensure the FEIS includes policy and the adopted code includes allowances for these small-scale commercial uses in legacy R1 residential zones. B C D

3. Please ensure the FEIS and adopted growth strategy plans for the higher job growth target of 38,848 new jobs by 2046. I was pleased to see the inclusion of a more ambitious jobs growth target in the studied alternatives. This recognizes the critical need to provide more high-wage jobs in growth industries for Spokanites. As the economy continues to change, primary employment (that is, jobs in industries E

other than healthcare, education, and government) is becoming increasingly critical. We need to ensure our growth targets and lands allocations accommodate this essential growth to increase opportunity for local residents. E

4. Please adopt the maximum possible SEPA exemption for infill development allowed by state law. As you know, under SB 5412, the state has allowed cities to conduct all environmental review for more types of projects, including housing and small commercial development, at the plan level, instead of the project level. This type of reform makes housing much less expensive to build, reducing delay and risk in the development process. It also makes it easier to construct office buildings and other types of development in areas where environmental impacts are unlikely. To ensure certainty for developers while adequately planning for potential adverse impacts, the City should adopt the maximum exemption allowed under the statute—200 units of multifamily development or 65,000 sf of commercial development. F

5. Please ensure the FEIS and adopted Comprehensive Plan sufficiently plan for greenhouse gas emissions reductions as required under HB 1181. While the EIS appears to do a decent job of addressing climate resilience, I would like to see additional policies and guidance aimed at achieving meaningful GHG reductions. For example, the Comprehensive Plan could adopt powerful new policy aimed at reducing vehicle miles traveled (VMT) through investments in the transportation system, or adopt policy aimed at incentivizing mode shift toward sustainable modes, like walking, biking, and using transit. Importantly, these policies would then need to be backed up through project-level decisionmaking and the adoption of capital plans. These types of policies—which actually reduce GHG emissions, rather than merely planning for resilience—are required under HB 1181. G

Thank you so much for your hard work. I'm looking forward to seeing the plan adopted and implemented.

Thank you,

Anthony Gill
(509) 954-3081

From: Crystal Glanz-Kreutz
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 9:01:45 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello,
I am writing to affirm my agreement with the following comments on the draft EIS, as shared by 350 Spokane.

-350 Spokane strongly prefers Alternative 3 as the City's selected growth alternative. This support is conditioned on the EIS adequately evaluating cumulative environmental impacts at the comprehensive plan level and ensuring that those impacts are avoided or mitigated through adopted development regulations, consistent with SEPA. A

-Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits B

-The City is considering expanded use of SEPA infill and housing exemptions. Given this approach, 350 Spokane ***urges the City to establish clear guardrails before broadly applying exemptions***, including completing an inventory of existing urban natural assets - such as tree canopy, habitat value, and ecological connectivity - to ensure that infill development does not result in unmitigated impacts to environmental resources within urban neighborhoods C

- We ***Oppose*** the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 in the EIS, shows all neighborhoods will be exempted from environmental review in two phases D

- We ***Support*** environmental review exemption only if the proposed development area is 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces.

Thank you,
Crystal Glanz-Kreutz

Sent from my iPhone

From: dancer@moxxee.com dancer@moxxee.com
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 2:50:51 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Greetings

Please remember that our community logo is Near Nature, Near Perfect.

Green space and trees left in the city make this a true logo. If this space is lost it will be a mockery of the logo. Do not pave everything over. Build high rise apartments and office buildings and leave trees and nature for people to enjoy without having to get in their car to find some nature. A

Sylvia Gobel
2337 W. Garland
Spokane, WA
992095

From: Daya Goldschlag
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS comments
Date: Wednesday, February 18, 2026 7:27:16 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Please do NOT eliminate Environmental Reviews. Support protection for our natural lands and wildlife habitats. Thank you, Daya Goldschlag, Spokane 99205 A

From: Gordon, Scott
To: Plan Spokane
Subject: "PlanSpokane 2046 Draft EIS Comments".
Date: Thursday, March 5, 2026 1:39:23 PM

Good afternoon,

After living here for 12 years, coming from California where the Environment takes Front Stage. I see Spokane so far behind the times when it comes to many aspects. From the police allowing trucks with modified exhaust, to blow Black Burned Oil Smoke into the air. To people working on their cars in the street and spilling Oil and other Toxic Fluids into the storm drains. Noise Pollution is Ubiquitous. People walk their dogs in the State Parks as well as School Grounds and leave the Defecations on the ground for people to step on.
Those are just a few of the Issues I and my neighbors have discussed and find to be Ignored by Police and Local officials. A B

I would enjoy being a part of the Climate Resilience and Sustainability Board should an opening become available. C

Thanks,
Scott Gordon
BAB (Board member)

From: Leah Gulick
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, March 5, 2026 10:23:39 AM
Attachments: 3.4 PlanSpokane Comments.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

See attached. I focused my comments on section 3.4.

Thank you!

--
LEAH GULICK (she/her)
503.332.7984 | legulick@gmail.com

Plan Spokane: Section 3.4

City of Spokane,

My name is Leah Gulick, and I am an undergraduate Environmental Science student at Gonzaga University as well as a student employee of the Institute for Climate, Water, and the Environment. As a resident of Spokane for three years now, I have grown to love this city. I want us to aid at-risk communities and sustainably develop our city to meet both our needs and the needs of future generations. To me, this involves developing land in a way that serves our community members, not just powerful corporations within city limits. With this in mind, I would like to provide feedback on the Draft EIS. A

First, I think that the City should consider adopting a new land use code that expands the definition of current zoning districts to include standards for preserved or park areas across all alternatives. From the acreage listed in Exhibit 3.4-6, the City should set aside a minimum percentage of land for greenspace, tree canopy, or parks for each zone, rather than concentrating park development in downtown districts. This could more accurately represent the “public/open space” designation seen in the Existing Land Use map (Exhibit 3.4.11) and ensure that land is set aside for all zones for public natural space. Moreover, minimum greenspace requirements could expand upon the goals of the Centers and Corridors Study (page 3-90) to diversify use. B C

On that note, I think that either Alternative 2 or 3 should consider how to implement restoration into land use planning. Development right now focuses on human use of roads or neighborhood centers, without designating areas to develop through restoration of park land, wetlands, or prairies that could provide ecosystem services to nearby residents or visitors. Two areas in need of land use planning that includes environmental restoration are the open gravel plots around Desmet Ave, near my house and the Clark Fork restaurant, and the open gravel lot near Kendall Yards. Empty land would better serve residents and our environment if it were restored as a productive ecosystem. D

Importantly, the City should heavily consider the negative environmental implications of Alternative 3 as outlined in this draft. As described in Exhibit 3.4-25, Alternative 3 would concentrate “intense clustering” on areas already seeing heavy use, focused around the city center. This means that noise pollution, traffic pollution, smog, and other negative environment effects already experienced by those in the city would increase. Additionally, industrial areas would remain in designated locations, such as in Northeast Spokane and the West Plains, without mixed-used development (Exhibit 3.4-25). This would concentrate pollution from industrial activities in these regions without making them safer or more livable. Concentrating growth in the city is additionally problematic due to the land surface temperatures and climate risk experienced by communities outside of the city center– as shown in Exhibit 3.4-23, the land surface temperatures can impact industrialized centers outside of the city, calling for an expansion of resources towards these hubs as well. E F G

Alternative 2 would decrease environmental impact because of the localization of services around neighborhood centers, which would increase walkability and decrease commute greenhouse gas emissions. Moreover, this could allow more local investment into development that meets the needs of local neighborhoods, leading to streets that are better taken care of. A part of this Alternative must be tree canopy installation around renovated areas. H

Another general change the City should consider in relation to Alternative 2 is ensuring that height limits change as neighborhood units are developed as mixed-use zones, allowing for more high-density housing and infrastructure in local areas (Exhibit 3.4-7). I think this is especially important for the Division Corridor, which is currently very commercial and without much integrated tree cover or housing, important in order to make the corridor feel accessible and safe. One area that implements mixed-use development well, in my opinion, is the growing Garland district which offers housing, safe and wide streets, tree canopy, and retail services all within a few blocks. I J

From: JENNIFER HALL
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 10:04:43 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

To the City of Spokane,
Environmental review of all developments is essential to maintaining a vibrant city... where people want to live, so businesses want to locate. Spokane's tree canopy is a key component of what people find attractive here. It is important to all kinds of wildlife. And it supports cooler urban temperatures and incredibly accessible healthy outdoor activities that promote community health and decrease carbon emissions. The following points need to be included in the PlanSpokane 2026 vision. Developers are not the only constituency.

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 (See photo). B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 (See photo) shows all neighborhoods will be exempted from environmental review in two phases. C

4. Support environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3 (See photo). Existing Hard (Impervious) Surfaces included below.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

Thank you,
Jennifer Hall
Spokane, WA

Comment # 94

PlanSpokane
Have a comment? Tell us!

Comment Card
Have a question? Ask away!

Name: JUSTIN HALLER

Contact: JUSTINHALLER@YAHOO.COM

A

DOUBLE DECK AND A STUPID IDEA ALL I TOLD YOU SO BEFORE

B

TWO WAY BIKE LANE ON SPOKANE FALLS IS ALSO A BAD IDEA

C

THERE IS NO CLIMATE CHANGE OPINION WHICH PEOPLE WOULDNT BUY BEACH FRONT PROPERTY

Mail this card (postage required) or email your questions and comments to **planspokane@spokanecity.org**

Continued Comments

Do not write past this line.

Postage Required

To:

City of Spokane
Planning & Economic Development
808 W Spokane Falls Blvd
Spokane, WA 99201

From: John Hancock
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, March 5, 2026 9:32:01 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

The absence of PFAS from this plan illustrates its weakness as “comprehensive”.

Ecology’s Airport Investigation about groundwater contamination on the West Plains confirms the urgency and severity. That danger to drinking water is a huge topic that cannot be ignored--the City and County are now jointly liable because of their ownership and history.

A

The EIS Topics “Earth, water quality, and water resources” and “Relationship to plans, policies, and regulations” and “Utlilities” must immediately be updated to admit and address this rapidly-advancing and very expensive reality. No urban boundaries correlate with groundwater flows and aquifer boundaries. I also note that the word “health” does not appear in this report. This plan does not "describe the potential environmental impacts, reasonable alternatives, and ways to avoid or minimize negative impacts of policies.”

B

Spokane is the hottest of PFAS hotspots in Washington, drawing significant attention now from State regulatory agencies and the EPA. That attention will increase as the Airport investigation unfolds. As a citizen, I expect your cooperation with their imperatives, and your anticipation of those rapidly-advancing interactions.

This Plan should hold in place until this issue gets comprehensive and forward-looking analysis. Yes, PFAS knowledge of this “emerging contaminant” is new, therefore the science is not settled. But your plan is designed to be forward-looking, and if approved as drafted will further retard the proper response to groundwater and surface water contamination from “forever chemicals”.

C

I’m at your service for such discussions of PFAS.
John Hancock
President, West Plains Water Coalition

From: Ted Hensold
To: Plan Spokane
Subject: comment on draft EIS
Date: Wednesday, February 18, 2026 11:47:08 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I would like to submit the following comments regarding the draft EIS for PlanSpokane 2046.

1. An environmental review exemption for developments should be allowed only if >66% of the area is disturbed or impervious. A
2. The city should conduct an inventory of undeveloped areas of continuous forest cover for areas exceeding 2.5 acres. The plan should include measures to protect and/or replace those. B
3. When development will result in removal of existing trees, require payment to Urban Forestry for planting projects. C
4. Emphasis on infilling areas that are already 33% impervious or 66% disturbed. D

Ted Hensold
2614 N Stevens St

From: Darla Greene
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Thursday, February 19, 2026 8:02:44 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.

To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!

Sincerely,
Darla Harryman
1734 E Decatur Ave, Spokane, WA 99208
Whitman Area

From: Lunell Haught
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, March 5, 2026 4:12:08 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I will not comment on specific sections, but please know that there is an undercurrent of what will ultimately be a net loss of habitat and natural areas. To sacrifice natural areas and parks to accommodate housing is short sighted. It turns housing into warehousing people. To move away from an environmental review, despite it perhaps being allowed in the RCW, moves us farther away from the quality of life Spokane treasures and brags about. A B

Lunell Haught
509.443.1319 (land line/no text)

From: J Hawk
To: Plan Spokane
Subject: PlanSpokane 2056 Draft EIS Comments
Date: Thursday, March 5, 2026 1:37:26 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

As part of a group interested in living in a simple, ecologically-responsible small-home village, we located a property, hired an architect to lay out a development, and approached Spokane County ...and were told there is no path forward for such a project. A

Spokane is ripe for dense, off-grid, simple, affordable, village-style pocket neighborhoods. Imagine how Spokane could be aligned with those of us wanting less environmental impact and more community.

Hoping in Spokane's future,

Jonas Hawk / greensage LLC
9909 N Ivanhoe
Spokane, WA 99218

From: Lesley Herrmann
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 2:42:55 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Regarding: LU 5.5, Compatible Development: Ensure that infill and redevelopment projects are designed to be compatible with and complement surrounding uses and building types. A

10807 E Empire in Millwood is a four building, three story, 24 unit multi-family complex built on a quite residential street with smaller homes. This is an example of violation, if you will, of UL 5.5 above. The residence in this community fought to prevent this complex from going into their neighbor, for obvious reasons.

These large multi family housing units need to stay out of neighborhoods and be restricted to Centers and Corridors. People live in neighborhoods because they are quiet, have less traffic, have more trees, and aren't flooded with obnoxious lighting.

Please do not allow large multi-family units to be built in quite neighborhoods (keep residential low and residential high construction separate).

Regarding: Raise height limits from 40/55/150 ft to 55/75/150 ft, depending on zone classification] B
Please do not raise height limits! I love Spokane because it doesn't feel like I'm living in a box like it does in other cities I've lived in (Denver, Nashville). Infilling with tall buildings block views for existing buildings. No one wants an apartment that looks into the window of someone else's apartment.

Regarding: Urban Canopy C
Maintaining and growing our urban canopy is critical. I think there should be a minimum tree planting requirement for every new home and multi-family unit built. I recommend working with the Urban Forestry Program Director at the Lands Council, Justyce Brant.

Regarding: SEPA D
No plan should violate, waive, or ignore SEPA. We need to critically evaluate the impact on the land, air, water quality, animals, and our trees. We cannot give large construction companies or corporations a free pass to build without an evaluation of how growth will impact our environment. SEPA is in place to help ensure sustainable growth and the health of the land and people of Spokane. What's the point of a sustainability plan if we don't have some environmental standards in place. PLEASE do not remove/waive/ignore SEPA in ***any*** plan.

SEPA should also include the environmental and health risks of cell towers. Please let me know if you need scientific resources and/or case studies supporting this.

General Concerns:
What I witnessed in Boulder Colorado was a fast increase in the number of mixed commercial and residential buildings being built. Today, a large percent of the commercial spaces are

vacant. Residential rent is extremely high to make up for some of the losses in revenue from having vacant commercial spaces, putting a strain on tenants. This also leaves what could be a vibrant bustling center feeling cold, empty, and sterol. E

I'm afraid that building too many multi-family homes reduces the ability for citizens to own their own homes. Increasing the percentage of apartments reduces the opportunity for homeownership and puts a strain on roadways. The benefits of population density reaches a point of diminishing returns. Please consider that tipping point. F

Please do not allow large construction companies or other corporations (eg Amazon) tax breaks in exchange for growth (more jobs, more houses, etc). It's simply not fair. Lost tax income could benefit the people of this great city and corporations should not receive a tax break. G

Land Use Type	**What uses should or should not be allowed?**	**Where should the land use be or not be** located?
Urban Agriculture	What should be allowed: Growing food, farming, ranching What should not be allowed: Multifamily housing; sub divisions.	North Spokane/Mead; South Spokane around 195/hangman creek; West Spokane between Spokane and Cheney (area between 195 and HW 904); Preserve Moran Prairie
Residential Low	Allowed: Construction allowed with the replanting of trees. Trees add value to properties. Not Allowed: No residential low units around industrial areas, please. Please minimize the number of corporate-owned properties so that residence can fulfill on homeownership.	
Residential High	Not Allowed: Please do not mix these buildings in with Residential Low. An example of this is the multi-family complex constructed at 10807 E Empire in Millwood. *Please preserve the look and feel of Spokane's existing	

H

	residential low neighborhoods.	
Commercial		
Centers & Corridors	Allowed: Multi-family Not allowed: Mixed-use commercial/residential.	
Institutional		
Downtown	Allowed: Mixed use commercial/residential *Please preserve the existing height limits.	
Industrial	Not allowed: No construction within in 3 miles of parks, schools, or subdivisions.	Geiger area.
Open Space	Keep open space open! Not allowed: Construction of industrial within 3-5 miles or open space.	Scattered throughout the city. Once example of this is near Upriver Dam. Please do not add a dog park. Leaving the space open around Indian Head Rock provides connection to nature. There are plenty of places to walk a dog. Additionally, the new large housing development in this area feels out of place and is very dense. The roads are not designed to accommodate that much traffic. The Centennial Trail by the river should remain a "nature path," not an urban park.

H

Thank you for reviewing community comments!

Lesley Herrmann
Westview Neighborhood

Music the great communicator
Use two sticks to make it in the nature. -AK

From: Carlee Hieb
To: Plan Spokane
Subject: PlanSpokane 2046 draft EIS
Date: Wednesday, February 18, 2026 6:51:31 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. To ensure Spokane remains "Near Nature, Near Perfect," I ask the Committee to address the following five critical areas:

- Comprehensive Inventory for Informed Policy: Spokane lacks the adequate codes to reach its 30% tree canopy goal. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A
- Enforceable Critical Areas Ordinance: Current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B
- Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C
- Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting remaining soft surfaces is vital for drainage and heat reduction.
- Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing the natural areas, wildlife habitats, and clean air and water that define our community. I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city.

Best Regards,

Carlee Hieb, RN
20318 N. Thor rd
Colbert WA 99005
509-954-2083

From: Henry Hiles
To: Plan Spokane
Subject: Comments on the Spokane DEIS
Date: Monday, February 16, 2026 4:43:19 PM
Attachments: Spokane DEIS Comments.docx

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello,

These are my comments pertaining to the Spokane DEIS.

Thank you,

Henry Hiles '26
Political Science and Environmental Studies Major with a Leadership Minor
Payne Center Fellow, Glee Choir President, and Facilitator of the Spring Leadership Conference
Email: whiles@zagmail.gonzaga.edu
Mobile: (816)-377-0417
Pronouns: he/him/his

Comments in reference to chapter 3.6.1 Affected Environment

On pg 3-192, The GMA Goals number 3 Transportation is set to “encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled.” The comments provided pertain to uplifting public transit and non-emitting modes of transport. Specifically, between neighborhoods around the urban core of Spokane.

A

Transportation matters to me as because the two modes of transport I utilize is the bus network and bikes lanes in the University and Downtown districts. Both districts have robust public access and allow for Spokanites to leave the car behind. However, having spent a day touring the Browne’s Addition, West Central, and Cliff Cannon I see areas that need connection through effective transportation. The Spokane DEIS provides information for the future connectivity and growth proposed, but having walked and bussed between each neighborhood I see holes in connectivity.

I began in the center of the University district and plotted my way to west central. The options provided were walking thirty minutes or taking the 1 to the 22 and 23 bus lines which also took thirty minutes. None of the bus stops that had direct lines were nearby nor the alternatives more efficient. I walked for the first leg of the day as no public transit was close enough to outweigh a walk. Nonetheless, I toured the west central bus stops and biking. Following my walk I began my trip to Browne’s Addition. Again, I found that walking in many cases was more effective than taking busses. On my walk I found no dedicated bike infrastructure along the main throughfare, Maple St, which worried me as the only

direct path to Browne's addition. Which is not a street planned nor built for bikers in mind. Following my walk up to Browne's addition I spent time around the Coeur d'Alene park and admiring the old homes. After taking photos of the 1 bus line Pacific and Oak stop, I noticed that this would be returning back to my starting point at university district. An example of how effective connective public transit can be as I could rely on public transit to meet my transportation needs. My final portion of my day was transportation from Coeur d'Alene park to Cliff Park. The 43-bus line was a ten-minute walk to the bus line and found that this was an example of effective transit planning for neighborhood connection. After an enlightening walk around three distinct yet geographically close neighborhoods I see the need for further effort in connective public transit.

A

I have described my experience above to outline what the DEIS aims to solve. Transportation, especially public, non-emitting methods, are minimal in the urban neighborhoods of Spokane. While downtown has the machinations of this program the outlying neighborhoods feel like islands. The buses and bike lanes are minimal and have little connectivity. Such low connectivity does not encourage Spokanites to utilize car alternatives. Frankly, I felt at the end of my public transit day that a car was the best option. Spokane has historically put the car first. From sidewalks to public transit the alternative modes of transport must be prioritized to see the encouragement stated in the 3rd GMA goal. Increasing bike lanes and creating an urban busing zone where more buses and routes will allow for all parts of the urban core to have connection. Spokane's push and want for increased forms of transportation is the correct step for a better Spokane society and climate.

Comments in reference to chapter 3.6.1 Affected Environment

On pg 3-192, The GMA Goals number 3 Transportation is set to “encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled.” The comments provided pertain to uplifting public transit and non-emitting modes of transport. Specifically, between neighborhoods around the urban core of Spokane.

B

Transportation matters to me as because the two modes of transport I utilize is the bus network and bikes lanes in the University and Downtown districts. Both districts have robust public access and allow for Spokanites to leave the car behind. However, having spent a day touring the Browne’s Addition, West Central, and Cliff Cannon I see areas that need connection through effective transportation. The Spokane DEIS provides information for the future connectivity and growth proposed, but having walked and bussed between each neighborhood I see holes in connectivity.

I began in the center of the University district and plotted my way to west central. The options provided were walking thirty minutes or taking the 1 to the 22 and 23 bus lines which also took thirty minutes. None of the bus stops that had direct lines were nearby nor the alternatives more efficient. I walked for the first leg of the day as no public transit was close enough to outweigh a walk. Nonetheless, I toured the west central bus stops and biking. Following my walk I began my trip to Browne’s Addition. Again, I found that walking in many cases was more effective than taking busses. On my walk I found no dedicated bike infrastructure along the main throughfare, Maple St, which worried me as the only

direct path to Browne's addition. Which is not a street planned nor built for bikers in mind. Following my walk up to Browne's addition I spent time around the Coeur d'Alene park and admiring the old homes. After taking photos of the 1 bus line Pacific and Oak stop, I noticed that this would be returning back to my starting point at university district. An example of how effective connective public transit can be as I could rely on public transit to meet my transportation needs. My final portion of my day was transportation from Coeur d'Alene park to Cliff Park. The 43-bus line was a ten-minute walk to the bus line and found that this was an example of effective transit planning for neighborhood connection. After an enlightening walk around three distinct yet geographically close neighborhoods I see the need for further effort in connective public transit. B

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From: Karli Honebein
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 9:58:26 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello!

I am writing to comment on the PlanSpokane 2046 Draft EIS. I strongly prefer Alternative 3 as the City's selected growth alternative. This support is conditioned on the EIS adequately evaluating cumulative environmental impacts at the comprehensive plan level and ensuring that those impacts are avoided or mitigated through adopted development regulations, consistent with SEPA. A B

Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits The City is considering expanded use of SEPA infill and housing exemptions. Given this approach, I urge the City to establish clear guardrails before broadly applying exemptions, including completing an inventory of existing urban natural assets - such as tree canopy, habitat value, and ecological connectivity in order to ensure that infill development does not result in unmitigated impacts to environmental resources within urban neighborhoods. C D

I oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 in the EIS, shows all neighborhoods will be exempted from environmental review in two phases.
I support environmental review exemption only if the proposed development area is 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces. E

Thank you for your time.

Karli Honebein
she/her/hers

From: MK Hughes
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 4:59:18 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee, I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity. To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas: Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction. Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. I look forward to youry response and to seeing these protections reflected in the upcoming plans for our city!

A
B
C
D
C

Sincerely,
MK Hughes
3227 W 4th Ave, Spokane, WA 99224

Ryan Hughes
210 W. 32nd Ave
Spokane, WA 99203

Tirrell Black,
Assistant Planning Director
City of Spokane
808 W Spokane Falls Blvd.
Spokane, WA 99201

December 24, 2025

RE: PlanSpokane 2046 Draft EIS Comments

Dear Tirrell Black,

Thank you for the opportunity to comment on the City of Spokane's 2046 Draft EIS. Please find the following comments below for your review and consideration. I appreciate the policy advances the City is pursuing. Spokane's potential is certainly yet to be met, and our vision is only limited by what we can dream. "*Make no little plans*" – D. Burnham.

Comment #1: Request to update the Land-Use Map Designation to allow for Commercial Mixed-Use to the south along S. Lincoln Street incorporating the block face adjacent to the "Mini Center" designated lands (i.e. Rosauers supermarket) on 14th Ave.

Request to extend commercial / mixed-use land use map designation (and subsequent zoning map) one block-face south of the existing "Mini Center" designation at 15th Ave and S. Lincoln Street (on the west side – see Exhibit B). As the owner of the subject property (1516 S. Lincoln), we appreciate the City's consideration to extend commercial / mixed-use designated use (on the west side) along S. Lincoln Street to 16th Ave. See exhibits: "A) Subject property location and vicinity", and "B) Proposed land-use designation." A

Note #1:

The subject property's location (See exhibit A) is ideal for neighborhood scale (i.e. walkable) commercial use. The proposed future use of the property includes a mix of uses, incorporating both commercial and residential. The property's current R-1 zoning designation does not provide flexibility to permit such neighborhood-scale, walkable, mixed-use. Updating to a neighborhood-scaled intensity mixed-use designation would correspond with the policies promoted (and outlined) in the city's current Comprehensive Plan Update. B

Comment #2: Overall, I support, appreciate and encourage the DEIS Alternative #3's intent to urbanize our community throughout. However, this should not preclude (or limit) opportunities for a mix of neighborhood-scale land uses throughout Spokane's neighborhoods outside of centers and corridors (think 'The Scoop', 'Iron Goat Pizza', etc.). C

Note #2:

The proposed zoning provisions, especially those envisioned changes to Residential Low and Residential High designations, are a positive step and advance neighborhood livability and walkability. Our neighborhoods should allow for a mix of neighborhood-scale use. This includes both retail and professional office use. The benefits are numerous: physical health, reduced vehicular traffic, higher tax valuations, community connections, and environmental health to name a few. I appreciate (and encourage) the City's proposal for allowing commercial and professional office use in Residential Low neighborhoods. D

Thank you for your consideration. Please see attached Exhibits which help support and visualize the subject property's proposed envisioned use. Please do not hesitate to contact me if you have any questions or would like clarification on these comments.

Sincerely,



Ryan Hughes, AICP

ryan@nexusplanningservices.com
(509) 822-9113

Exhibits:

A: Subject property location and vicinity

B: Proposed land-use designation

C: Street view (Current) 1516 S. Lincoln

D: Street view (1516 S. Lincoln). Concept mixed-use AI rendering including ground floor retail.

EXHIBIT A: SUBJECT PROPERTY LOCATION AND VICINITY

Comment # 105

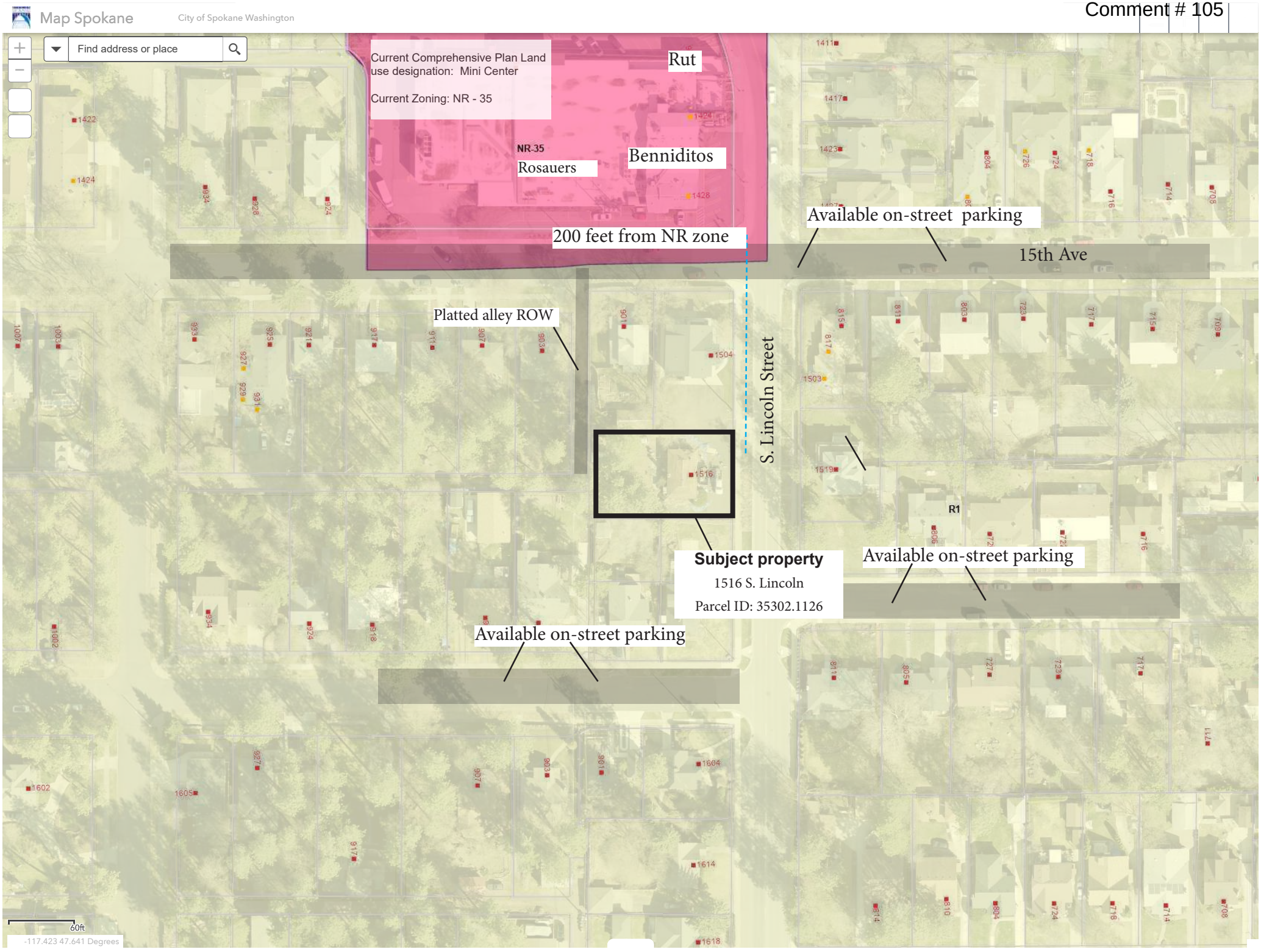


EXHIBIT B: PROPOSED UPDATED LAND USE DESIGNATION

Comment # 105

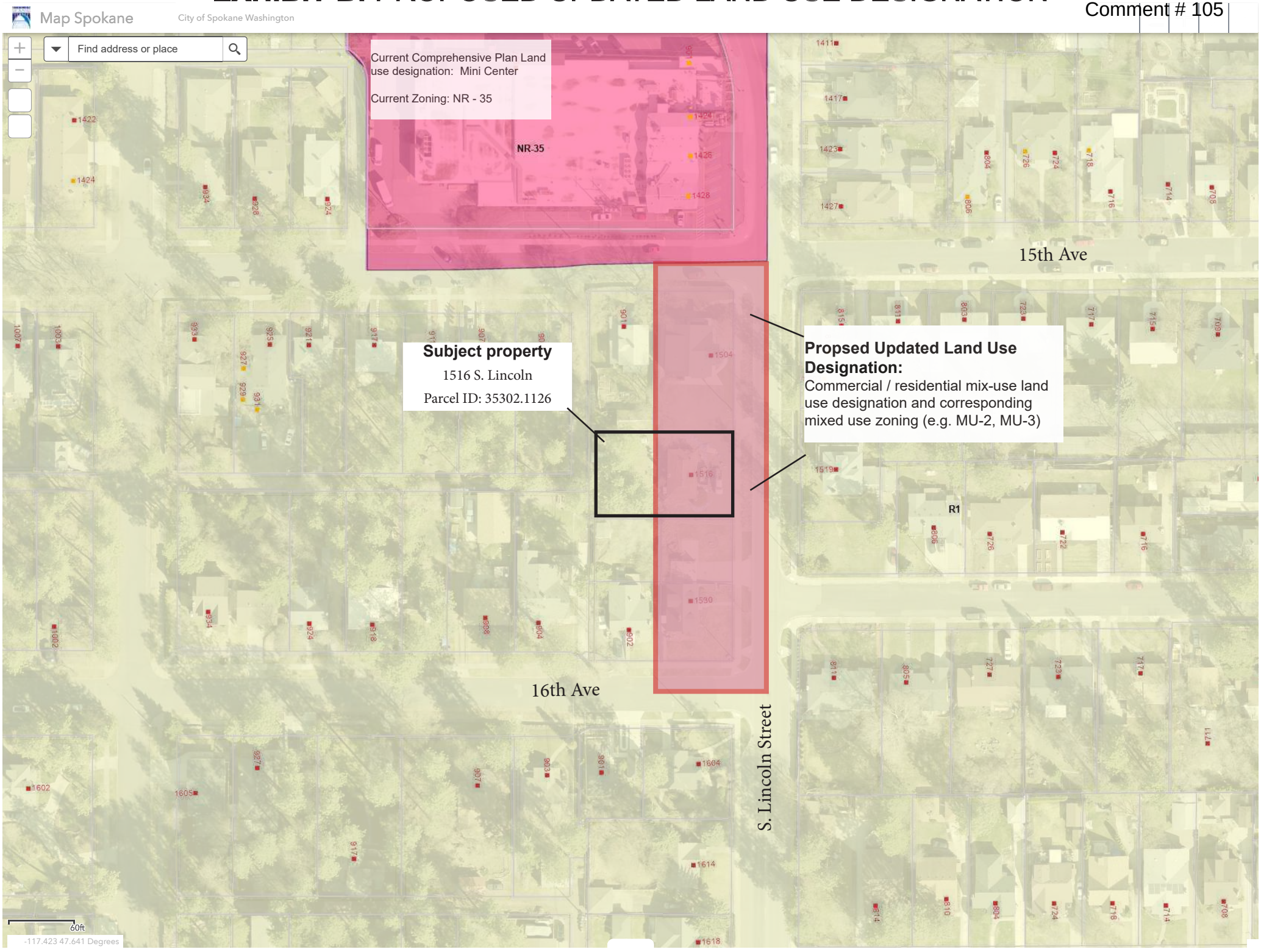


EXHIBIT C: STREET VIEW (1516 S. LINCOLN ST)



Comment # 105

EXHIBIT D: MIXED-USE A.I. GENERATED RENDERING (1516 S. LINCOLN ST)



From: tacy mitchell
To: Plan Spokane
Subject: Comment on Development Plans and Environmental Review Exemptions
Date: Thursday, March 5, 2026 7:24:51 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing regarding the proposed development plans and environmental review exemptions currently under consideration. I am DEVASTATED that the council would consider allowing this to be passed, excluding neighborhood councils and allowing for the concerns of developers to be put over residents.

Our city's slogan is "Near Nature, Near Perfect," this policy suggests a stark contrast from our slogan. Perhaps 'Was Nature, Now Developed" is the theme of this new policy?

The policy also makes it so that no one of low-income, or hardly anyone of low-income will benefit. As the developers interests are aligned with building homes for higher income individuals. So now we are going to out price residents and gentrify our whole city? What a terrible idea.

To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we choose to develop without transparency, or thorough environmental review, we are creating damage that cannot be undone. Nature is not creating new parks. Nature is not creating new wildlife habitat; it is up to the residents of Spokane to create that, to protect that. C

Please recall our slogan, think of our beautiful city and the children who will enjoy the canopy in the future. Consider the animals, the trees and why the South Hill is so beautiful. It is because of all of the Nature.

Jennifer,

From: Heather Joeschke
To: Plan Spokane
Subject: Proposed Development Plans comment
Date: Thursday, February 26, 2026 5:13:32 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing regarding the proposed development plans and environmental review exemptions currently under consideration. I am DEVASTATED that the council would consider allowing this to be passed which would exclude neighborhood councils and allow for the concerns of developers to be put over residents.

Our city's slogan is "Near Nature, Near Perfect," this policy suggests a stark contrast from our slogan. Perhaps 'Was Nature, Now Developed" is the theme of this new policy?

The policy also makes it so that no one of low-income, or hardly anyone of low-income will benefit. As the developers interests are aligned with building homes for higher income individuals. So now we are going to out price residents and gentrify our whole city? This doesn't sound equitable and in the highest good for all citizens.

To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we choose to develop without transparency, or thorough environmental review, we are creating damage that cannot be undone. Nature is not creating new parks. Nature is not creating new wildlife habitat; it is up to the residents of Spokane to create that, to protect that. C

Please recall our slogan, think of our beautiful city and the children who will enjoy the canopy

in the future. Consider the animals, the trees and why the South Hill is so beautiful. It is because of all of the Nature.

Thank you,

Heather Joeschke

From: Nicholas Johnson
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Monday, February 16, 2026 3:37:36 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello City of Spokane

Regarding the City's draft Environmental Impact Statement I would like to come out in favor of Alternative 3.
Alternative 3 supports Higher density primarily focused in the city center. This option is the best and strongest option from a climate and land-use perspective. A+ B

I support this option because it:

Most strongly supports public transit use, increasing ridership and reducing vehicle miles traveled
Slows the growth rate of CO_2 emissions and other vehicle-related pollutants
Uses land more efficiently and reduces pressure for sprawl and deforestation
Encourages redevelopment of downtown parking lots into productive uses, including housing, rather than reinforcing heat-island conditions
Employs the most efficient water use by reducing the demand for large lot sizes per household C, D, E

Thank you,
Nicholas Johnson

From: TERRI & BRIAN JONES
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS comments
Date: Tuesday, February 17, 2026 10:24:28 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

To City of Spokane Administration,
Please do NOT eliminate the Environmental Review of developments. This could cause enormous harm to our community and neighborhoods. C

We need to protect our trees and natural land inventory. Spokane has a tree canopy of 30% and there is strong support for natural land protection without adequate codes. An inventory of trees, natural areas and wildlife habitat is necessary to inform critical area code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

Please support an enforceable critical areas ordinance as required to protect critical areas, trees, habitat, water quality, etc. there are unprotected natural lands throughout our city that are critical to the survival of wildlife and needed by our community. B

I oppose the blanket Environmental Review exemption and support protecting critical areas such as wetlands, forests, wildlife habitat and riparian areas in our neighborhoods. I support the Climate Resilience and Sustainability Board's recommended Policy Land Use and Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments and regional partnerships."] C D
I support the Environmental Review exemption ONLY if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces. C
I support providing housing for those who are actually in need of housing but DO NOT support the current policy of trickle down housing- or build anything everywhere. There are many giant hotel sized homes being built on green spaces. This does not help anyone. Please DO NOT take one of the very few mechanisms ordinary Spokanites have of maintaining our sanity, our unique City and our wildlife. E

Thank you,
Theresa Jones
Spokane City Resident

From: Hannah Jurado
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 3:38:39 PM
Attachments: PlanSpokane 2046 Draft EIS Comments.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Tirrell Black,

I am writing to provide comments to the Draft EIS, I have included these comments in the email below and attached a pdf with the same comments as I was unsure of the best format.

I am a senior at Gonzaga University, and I have had the opportunity to explore Spokane for the last 4 years. I am originally from Los Angeles, and the opportunities for outdoor recreation are not as accessible as they are here in Spokane. Here in Spokane, outdoor recreation is easily accessible, whether that be through public transportation or its presence in the downtown area. This city is unique in its proximity to various outdoor spaces that are available for recreation and provide critical habitat for wildlife. Living in Spokane, there is a dominant mindset present that is centered on environmental care and protection, the residents of Spokane enjoy being outdoors and appreciate efforts that contribute to environmental protection.

In reviewing the Draft Environmental Impact Statement, I was especially interested in Chapter 3, Section 3 Plants and Animals. As Spokane continues to grow, development is inevitable; however, this should be done in a manner that prioritizes the protection of crucial habitat for wildlife, while growing in a sustainable and environmentally conscious manner. Chapter 3.3 states that all 3 alternatives assessed would result in a less than significant impact to both plants and animals (3-71, 3-72). However, in section 3.3.2, the draft statement states that all the alternatives would “provide opportunities for development within currently vegetated areas; thereby all have the potential to impact

A

B

wildlife and fish habitats" (3-70). The impacts caused by development would not be insignificant, even if the projects were to comply with regulations, the loss of habitat and environmental impacts that will result from developmental projects will cause negative long-term effects. Loss of biodiversity and possible contamination of waterways, groundwater, and increased pollution could detrimentally impact the wildlife, aquatic life, and citizens of Spokane. These consequences should not be written off as less than significant in relation to the possible plans for future development. Alternative 2 appears to be the most expansive in the area it would plan to develop, this growth would put additional pressure on priority habitat areas with its planned course of development. While it is stated to have less than significant impacts, it will encroach on priority habitat, putting the functions of the existing ecosystem at risk, and while the outcome has the possibility of being negligible, the risk should not be taken when other alternatives are presented. In future development, there should be a focus on maintaining the undeveloped areas, not only for the sake of wildlife but for the recreational opportunities it provides in a growing city. Alternatives 1 and 3, allow for less undeveloped land to be utilized for increasing housing and job intensity. The development plans also do not account for environmental justice concerns that are tied to plans and animals. Tree cover is one issue that could be addressed with development, especially because many of the sites for development have little to no tree cover. An increase in tree cover could be helpful for the residents of these neighborhoods, and it will positively impact wildlife.

B

C

Overall, the proposed plans for development do not adequately assess the environmental impacts that will occur because of the increase in development being planned. Spokane's undeveloped outdoor spaces should not be taken for granted; they

should be protected and cared for. In a world where our environment is being threatened by climate change and widespread urbanization, Spokane should aim to protect its undeveloped natural spaces and the wildlife that relies on these areas for habitat.

Best,

Hannah Jurado

I am a senior at Gonzaga University, and I have had the opportunity to explore Spokane for the last 4 years. I am originally from Los Angeles, and the opportunities for outdoor recreation are not as accessible as they are here in Spokane. Here in Spokane, outdoor recreation is easily accessible, whether that be through public transportation or its presence in the downtown area. This city is unique in its proximity to various outdoor spaces that are available for recreation and provide critical habitat for wildlife. Living in Spokane, there is a dominant mindset present that is centered on environmental care and protection, the residents of Spokane enjoy being outdoors and appreciate efforts that contribute to environmental protection.

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priority habitat areas with its planned course of development. While it is stated to have less than significant impacts, it will encroach on priority habitat, putting the functions of the existing ecosystem at risk, and while the outcome has the possibility of being negligible, the risk should not be taken when other alternatives are presented. In future development, there should be a focus on maintaining the undeveloped areas, not only for the sake of wildlife but for the recreational opportunities it provides in a growing city. Alternatives 1 and 3, allow for less undeveloped land to be utilized for increasing housing and job intensity. The development plans also do not account for environmental justice concerns that are tied to plans and animals. Tree cover is one issue that could be addressed with development, especially because many of the sites for development have little to no tree cover. An increase in tree cover could be helpful for the residents of these neighborhoods, and it will positively impact wildlife. Overall, the proposed plans for development do not adequately assess the environmental impacts that will occur because of the increase in development being planned. Spokane's undeveloped outdoor spaces should not be taken for granted, they should be protected and cared for. In a world where our environment is being threatened by climate change and widespread urbanization, Spokane should aim to protect its undeveloped natural spaces and the wildlife that relies on these areas for habitat.

From: Eileen Kazura
To: Plan Spokane
Cc: Secretary Emerson/Garfield; Chair, Emerson-Garfield; ca@emersongarfield.org
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 9:01:09 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello,

On behalf of the Emerson-Garfield Neighborhood Council, I am submitting the below questions and concerns regarding the PlanSpokane 2046 Draft EIS. At the February 11, 2206 EGNC meeting, the Council voted to submit these questions as a formal comment, raising concerns about the proposed growth alternatives and the potential impacts on low income neighbors and infill development in our neighborhood.

Comments/Questions

1. The draft EIS uses the neighborhood council boundaries but gives no role or voice to the councils or the Community Assembly, although these are the city's constituted bodies for residents' expression regarding governance issues. It does mention reliance on Neighborhood Action Plans, but many of those are either outdated and in some cases are non-existent. A

2. Both the Plan Commission and various community members have concerns regarding both Alternatives 2 and 3. What is the mechanism for modifying these alternatives and coming to consensus on a single, final map? B

3. When looking at Alternatives 2 and 3, it is important to consider the number and types of additional housing units that are required in the next 20 years. Several 2025 studies, including the Land Capacity Analysis and Accommodating Affordable Housing, point to the fact that the city already has sufficient or surplus housing for all income types except 0-80% AMI. In that category, Spokane has a 4,400-unit shortage. In 80-120% AMI, there is a 6,000-unit excess. In 120% AMI there is a 9,000-unit excess. The only housing needed until 2046 is in the lower income categories. How might this fact affect land use, permitting, demolition, incentives, etc.? The EIS seems to be written with the idea that building by private individuals will continue unabated whether need has been established. It seems that the idea is that city residents must accept all additional construction with the idea that some of the housing will accrue to residents in the 0-80% AMI category. However, no mechanisms to accomplish this are proposed in the draft EIS or elsewhere. C

4. The role of demolition of housing stock is a key issue in both alternatives but is not mentioned early in the draft statement. Demolition of current stock comes with many issues, including the potential displacement of those with lower incomes, the reduction of home ownership in favor of renting, and the disruption of neighborhoods, especially those near corridors with empty lots on which owners do not wish to build housing. However, as currently written the document suggests that none of these issues is a problem. The city seems to be relying on action alternatives that would address affordability in the marketplace, and the D

City's new policies and codes addressing anti-displacement measures. There is no proof that such will take place or be effective.

5. The projected impact of the contemplated exemptions is extensive. For instance, Exh. 6 p. 612 shows how an infill exemption extending the 'corridor' definition to one-half mile on each side of the corridor would affect some neighborhoods negatively. The 'Exemption' document (originally separate but now the final appendix of the EIS) even calls for the entire city to be designated a 'corridor'. E

6. Given that the draft envisions that no alternative will result in the increased use of transit and only a tiny increase in use of active transportation, is the City doing enough to reduce the use of personal vehicles that is the source of a large proportion of pollutants? Where will the increased number of vehicles correlated to the increased population be parked? F

7. The section labelled "Earth, Water Quality, and Water Resources" does not contain a single reference to the aquifer that is vital to our region. Why? How will G

the Plan, in this section and elsewhere, address the current numerous and profound attempts to reduce and eliminate environmental considerations, incentives, and regulations at the federal level? H

8. Since there is provision for course correction during the 20-year period, it is essential that we use today as a starting point, when considering population, current housing stock, family size, the state of the environment, home ownership, displacement, etc. The statement should seek to lessen environmental impacts, while improving home ownership and minimizing displacement. I

Summary

In sum, the effect of infill exemptions and Plans 2 and 3 will open neighborhoods to exploitive and somewhat unregulated development where retail, restaurants and apartment buildings are placed in the midst of single-family home communities, often with no parking requirements and no room for trees. Many resident commentators on the draft comprehensive plan indicate that there is no need for an either/or approach to these options. Rather the city might adopt the best from each of them to achieve the goals of protecting neighborhoods, increasing environmental integrity and reaching environmental goals (such as air quality through the protection of trees) and provision of affordable housing. But clearly, as offered, none of these options are optimal. As written, neither Options 2 or 3 protect neighbors or neighborhoods for the reasons mentioned. J

Please do not hesitate to reach out with any questions.

Best,
Eileen Kazura
Chair, EGNC

From: Megan Keller-Mikkelsen
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 12:13:27 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.

To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!

Sincerely,
Megan Keller-Mikkelsen
Millwood, WA

From: Gabriel KG
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 1:11:41 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello,

As a Spokane resident who has a background studying environmental science, I support Alternative 3. It provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits. A

I oppose the blanket Environmental Review exemption. I support the environmental review exemption only if the proposed development area is 100% disturbed and impervious as identified in the Draft EIS. B

Thank you for your consideration,
Gabriel Kennedy-Gibbens

From: sahara khouja
To: Plan Spokane
Subject: Plan Spokane
Date: Wednesday, February 18, 2026 3:42:35 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk.
Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction. C

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Sahara Khouja
4710. North Murray dr Otis orchards

From: Jake Kleinknecht
To: Plan Spokane
Subject: "Plane Spokane 2046" draft EIS -- comments
Date: Sunday, March 1, 2026 8:29:47 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

1) Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured.
2) Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. A

3) Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. B

4) Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction. C

5) Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, provide needed wildlife habitat and corridors, and protect clean air and water for all residents in Spokane. C

I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections.

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!

Sincerely,
Jake Kleinknecht
99205
Emerson-Garfield

From: Jeremy and Millayna Klingback
To: Plan Spokane
Subject: Supporting protection of natural lands and wildlife habitat
Date: Wednesday, February 18, 2026 7:19:23 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello,

Please preserve supporting protection of natural lands and wildlife habitat.

I strongly prefer Alternative 3 as the City's selected growth alternative. This support is conditioned on the EIS adequately evaluating cumulative environmental impacts at the comprehensive plan level and ensuring that those impacts are avoided or mitigated through adopted development regulations, consistent with SEPA. A, B

-Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits A

I urge the City to establish clear guardrails before broadly applying exemptions, including completing an inventory of existing urban natural assets - such as tree canopy, habitat value, and ecological connectivity C, D

- to ensure that infill development does not result in unmitigated impacts to environmental resources within urban neighborhoods

- We oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 in the EIS, shows all neighborhoods will be exempted from environmental review in two phases E

- We Support environmental review exemption only if the proposed development area is 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces.

Please think of Spokane's future in terms of quality of life for posterity. Please think about decisions that were made in past generations that didn't consider the safe use of lands, waterways, the interconnected nature of our resources; think of the prices we pay now in the flow and polution even of our river and conserve environmental review.

Millayna Klingback
509-220-9330
10201 N. Comanche Dr

From: Jaime E
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 3:06:18 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.

To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is our birth right! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Jaime Koedding
Westview/Shadle neighborhood

Sent via the Samsung Galaxy S24 Ultra, an AT&T 5G smartphone
Get Outlook for Android

From: Jeff Lambert
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 5:00:09 PM
Attachments: Exhibit 7- Phased SEPA Proposed Infill Categorical Exemption Area.pdf
PastedGraphic-2.tiff
PastedGraphic-1.tiff

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Tirrell Black,

Lots of good information in the DEIS. I am very concerned that the City of Spokane intends to eliminate Environmental Review of developments to encourage infill in all parts of the city. I hope that there is more analysis and consultation with neighborhood councils.

pport Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. I don't see much in the DEIS that addresses natural lands. A

pport an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 B

)ppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 below shows all neighborhoods will be exempted from environmental review in two phases. C

uport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces included below. I also support bonus density for development on 100 percent impervious and bonus density within ¼ mile of the corridors identified.

upport the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

Use your own words, or just copy the talking points and Comments must be submitted via email to **PlanSpokane@spokanecity.org** by **5 p.m. on February 18, 2026**.

Jeff Lambert

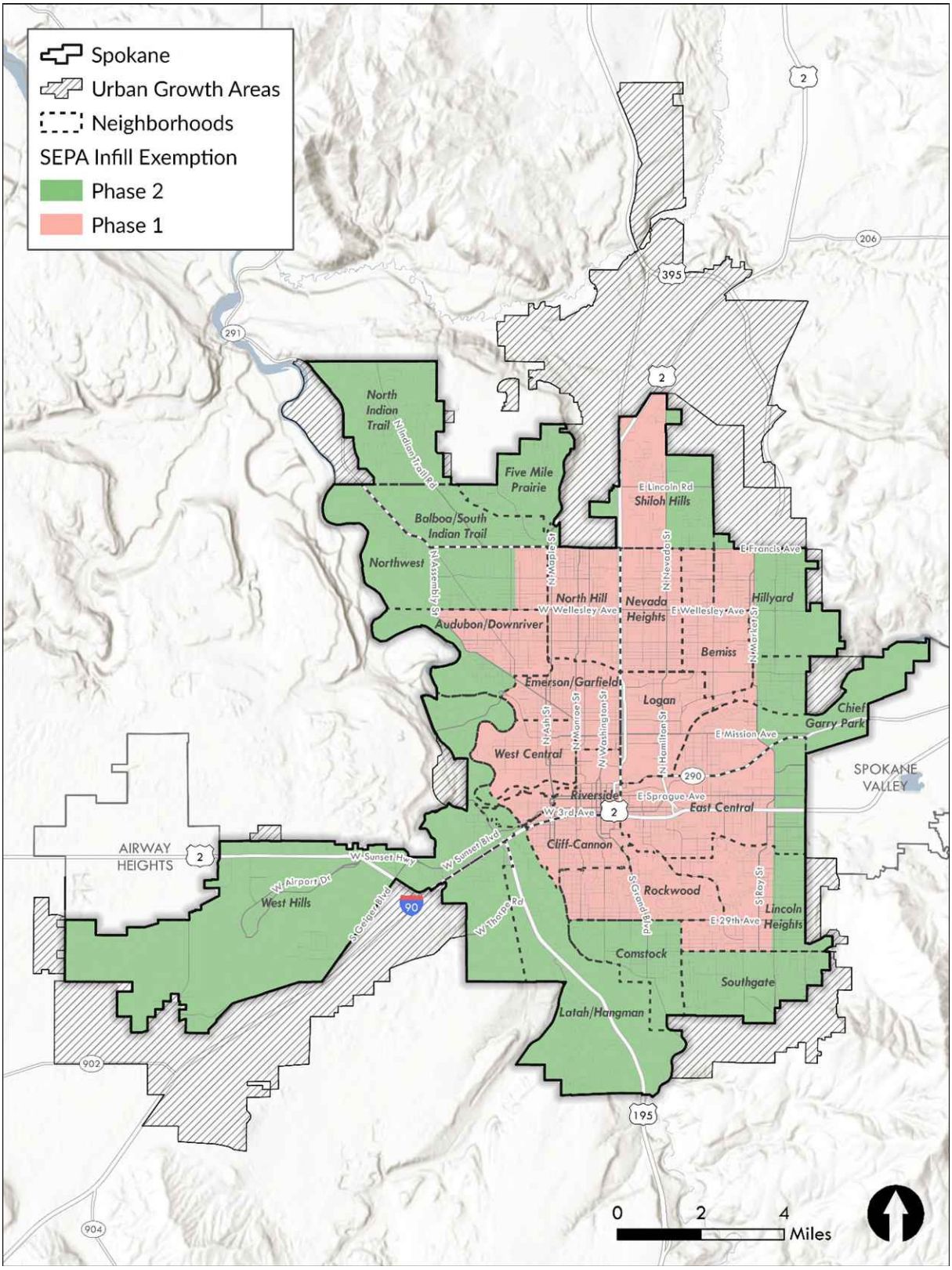
16 E 39th Ave, Spokane, WA

Exhibit 7. Phased Environmental Review Exemption

Exhibit 3.1-3. Existing Hard (Impervious) Surfaces

Comment # 118

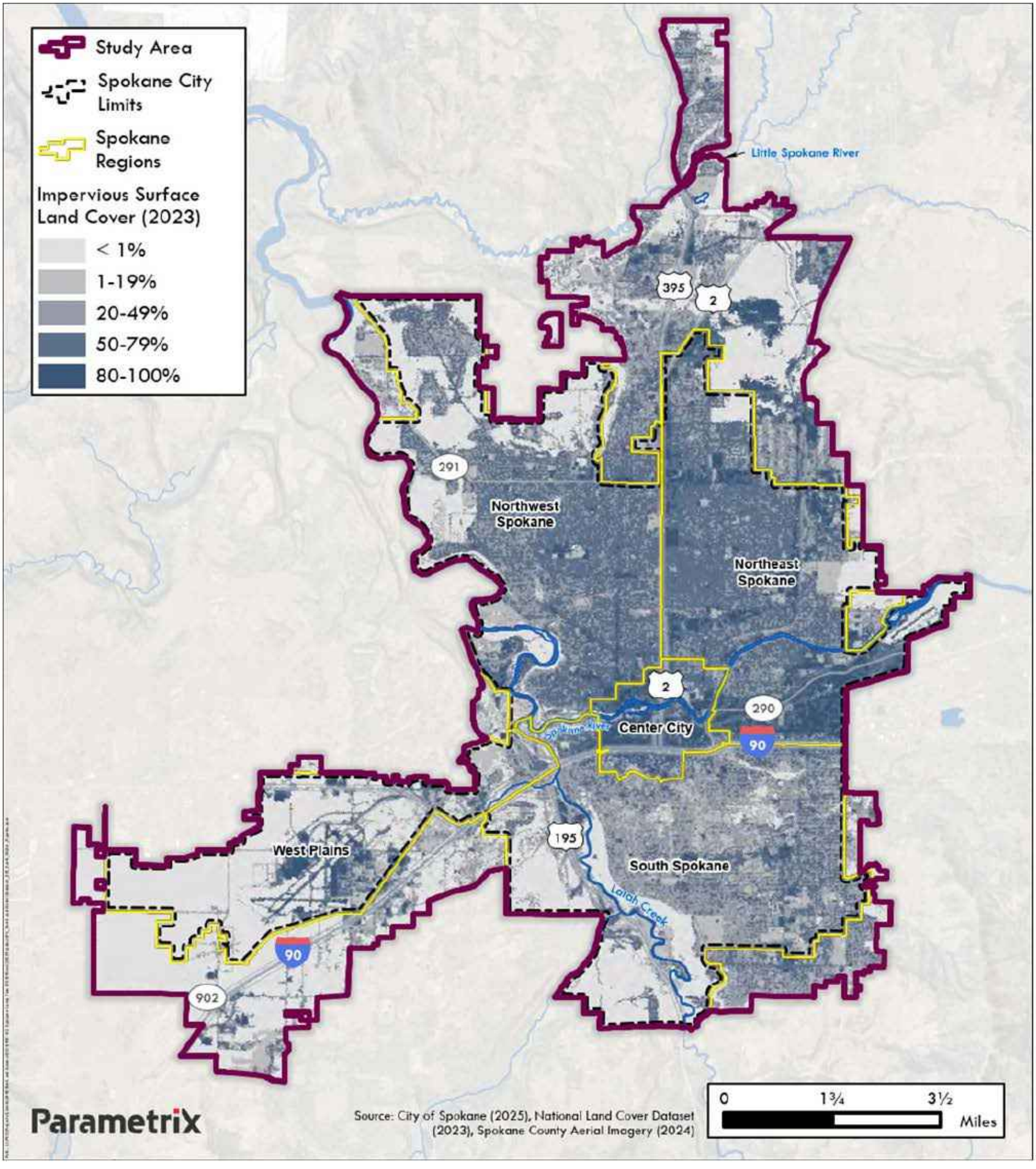
Exhibit 7: Phased SEPA Proposed Infill /Categorical Exemption Area



Source: City of Spokane, BERK, 2025.

Exhibit 3.1-3. Existing Hard (Impervious) Surfaces

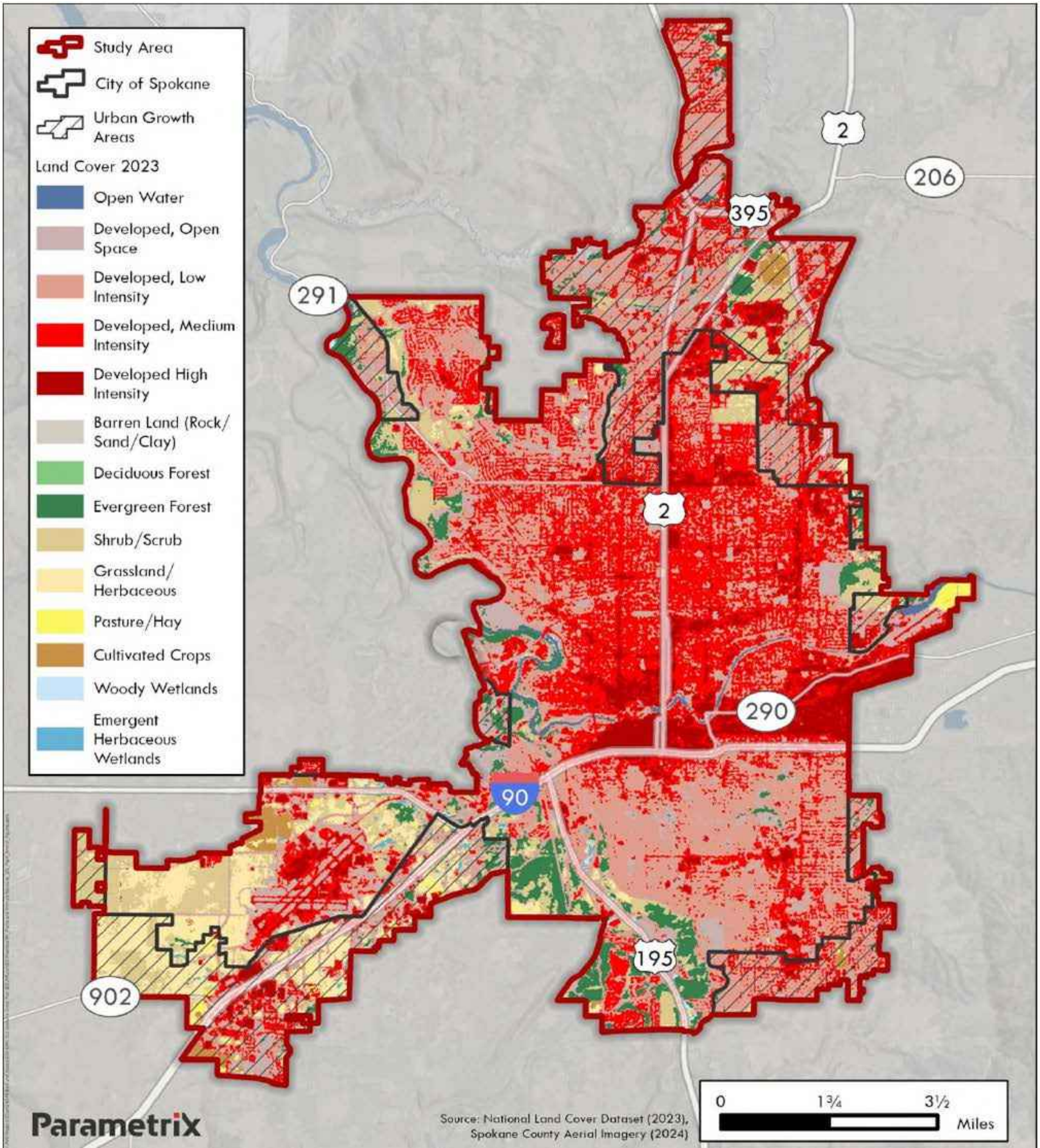
Comment # 118



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

Comment # 118

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



From: Jeff Lambert
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, March 5, 2026 4:58:08 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Tirrell Black, Assistant Planning Director
City of Spokane
808 W Spokane Falls Blvd
Spokane, WA 99201

To Whom it May Concern:

I am very concerned about the environmental exemptions under Section 5 prepared by Berk Consulting Inc, December 2025. The reliance on State regulations is misguided as both Washington Dept of Fish and Wildlife and the Dept of Natural Resources seldom comment and even when they do, the recommendations are ignored by the City Planning Dept.

1. Section 5.2.2 presents exemptions by raising the number of houses or multifamily units. A development with 20 houses or 20 multifamily units should not receive an exemption. There are many properties with critical areas as defined in City Code as well as state regulations. Right now there is little enforcement by the City Planning Dept as illustrated by the Latah Glen development where WA Dept of Fish and Wildlife commented on priority wildlife habitat and priority species of concern as described in Code 17E.020.030. The City allowed the property to be clear cut and grubbed. No protection at all. B
2. Section 5.2.2 also states that “”have been adequately addressed for the development exempted”. In fact, the state regulations do not address all of the identified critical area types in the City code 17E.020. There is inadequate analysis in the DEIS to define how the environmental exemptions will impact the obvious loss of ecological functions from development. A+ C
3. The list of Regulations in Section 5.3 are not effectively enforced currently and without environmental review, compliance will be even less likely. There is no explanation how those regulations will be reviewed and enforced with the environmental exemption. D
4. In Section 5.4 the Potential Infill Exemption Phases are unclear whether each phase is a blanket exemption without regard to the natural characteristics or if the referenced Exhibit 4 Existing Hard Surfaces as well as exhibit 3.3-4 showing Natural Resource Designations would affect exemptions. Using 100% hard surfaces as the criteria is appropriate. Not by a blanket exemption for the City in two phases. E
5. There is inadequate quantification of impacts of the exemptions in Alternatives 2 and 3 in Section 3.3 Plants and Animals. Exhibit 3.3-2 shows the land cover types but has no scientific data supporting how natural lands such as the critical areas such as forests, wetlands, grasslandss, shrub-steppe would be impacted by the exemptions. F
6. Section 5.2.1 states, “To accommodate infill development in urban areas not meeting the density goals”… provided the adverse impacts have been adequately addressed. There is no discussion of how to adequately address environmental impacts. G

The approach that benefits the City is to exempt parcels that have 90-100% impervious surfaces. Areas of more than 10,000 sf of undisturbed would be excluded from the exemption. There is a tremendous amount of GIS data that makes exemptions based on site conditions H

instead of geographic location.

The environmental analyses has not been documented that would allow the exemptions to move forward.

Jeff Lambert
16 E 39th Ave
Spokane, WA 99203

From: Carol Landa-McVicker
To: Plan Spokane
Cc: Carol Landa-McVicker
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Friday, February 13, 2026 2:42:38 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I am a life long resident of Spokane and have lived in the Lincoln Heights Neighborhood for over 25 years. I am secretary of the Neighborhood Council and regularly attend the Land Use Subcommittee meetings of the CA . I am a board member of Spokane Urban Nature (SUN) and have been involved in the committee working with Councilman Dillon to develop a tree ordinance (Friends of Trees, Mary Stohr, Chair).

I support aspects of Alternative 2 & 3 and am particularly concerned that the final document includes consideration of the following: A

First of all, I would like to see initial growth concentrated in the core area of the City and along major arterials where there is already transit, public services and retail outlets. This builds a strong sense of community. However, I think the 1/2 mile from arterials radius that is proposed to too big. It should be reduced to have minimal impact on established neighborhoods until additional housing is needed in the future. B

There are, for example, many vacant lots and lots that need redevelopment in the East Sprague area. New housing in this area would provide access to transit, retail and public services and should be used to provide housing in what is reported to be the area of most need for the foreseeable future, the 0-80% AMI category. Data shows that the City already has sufficient or surplus housing for all other income types except this category. There are also other areas throughout the city along arterials that would meet these criteria. This would include areas north of the river. On the other hand, building hundreds of homes miles from the City without careful consideration of the infrastructure (schools, fire departments, roads, transit, etc.) such as has happened in the Latah Valley in unconscionable. Not only does it destroy natural areas, but it also it doesn't meet the needs of our current population.

Secondly, in past few years, the City has allowed middle housing in R1 neighborhoods with no requirement for parking if within 1/2 mile of a transit stop. This policy is unrealistic and does not take into consideration topography, walkability, traffic congestion, or pedestrian safety. A study needs to be done to show whether or not this policy is achieving the goals it is intended to meet, i.e. provide more low- and middle-income housing. I don't think it is as many units remain vacant or are too extensive to meet the needs of the intended population. I have heard planning staff say there is a "domino" effect in which people moving into more expensive housing leave lower income housing available. I don't think this is true. We have a lot of seniors in our community who are downsizing. The homes they are leaving are expensive homes and not starter homes. This unregulated, unrestricted policy causes confusion and disruption of stable and historical neighborhoods and does not meet the housing needs of low-income residents as intended. C

Related to this is the fact that most of us still depend on our cars to get to work, appointments, meetings and recreational activities throughout the area. I have family in New York City and Washington DC and have seen firsthand how mass transit can reduce the need for private vehicles. Spokane isn't there yet and won't be for the foreseeable future. A short 10-minute drive in a car can take an hour or more on the bus. In the future, with growth in population and expansion of mass transit, this may become realistic, but not for years. D E

Next, and I hope related, I would like to see a requirement that neighborhoods be informed when multi-family developments are proposed by developers in residential neighborhoods. For example, 16 town homes were proposed for construction on the corner of E Mount Vernon Dr and S Mount Vernon St on the south hill. If neighbors had not noticed and followed up on surveying and other pre-construction activities on the property these units may have been built with no consideration for the protection of the wetlands that drain onto the property, access to Lincoln Park and impact on the infrastructure if no parking was required. This property is on a hill, there are no sidewalks, the streets are already congested with parents dropping off and picking up students at Franklin School, and, because of the hill, there is limited access to the bus stop on 17th in the winter when streets are icy. F

Finally, in support of the goals of SUN and the Friends of Trees, I would like to see urban forests and wildlife corridors protected as much as possible, from the arbitrary destruction of the tree canopy when clear cutting is allowed with no requirement for replacing the trees. I believe the tree ordinance, if adopted will address many of these concerns. To address climate change, including air and water pollutions, we need to preserve not only our urban forests, but also expand planting and care of neighborhood trees. G+H

Thank you for the opportunity to comment and for your attention to these concerns.

Carol Landa-McVicker
2705 E Mount Vernon Dr
Spokane, WA 99223

(509) 534-3536 h
(509) 435-1506 c

"*Our lives begin to end the day we become silent about things that matter*." (Martin Luther King, Jr.)

From: Carol Landa-McVicker
To: Black, Tirrell; Plan Spokane
Cc: Karen Mobley; Carol Landa-McVicker
Subject: Re: PlanSpokane 2046 Draft Environmental Impact Statement (EIS)
Date: Sunday, February 15, 2026 5:21:33 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Resending as email to City didn't go through.

Carol Landa-McVicker
2705 E Mount Vernon Dr
Spokane, WA 99223

(509) 534-3536 h
(509) 435-1506 c

"*Our lives begin to end the day we become silent about things that matter*." (Martin Luther King, Jr.)

On Sunday, February 15, 2026 at 05:12:08 PM PST, Carol Landa-McVicker <cj_99224@yahoo.com> wrote:

A

I have already submitted comments on the Environmental Impact Statement (EIS), but I recently learned that the City of Spokane is planning to remove the requirement for environmental reviews on developments to promote infill throughout the city. I am against these haphazard developments that lack thorough impact assessments, and I strongly oppose the elimination of environmental reviews.

To illustrate, last year a developer proposed constructing 16 townhomes adjacent to the east side of upper Lincoln Park on Mount Vernon St and Mount Vernon Dr. The proposal ignored the wetlands to the south which had not been identified and that flow into the property. Without objections from neighbors, the development would have caused significant damage to this ecologically sensitive area, potentially leading to seasonal flooding for homeowners downhill. When this oversight was brought to the attention of the City and State, a comprehensive environmental study was conducted, resulting in the protection of this delicate ecosystem. This underscores the importance of MANDATORY notification to neighbors prior to approval of infill development proposals, regardless of size and completion of thorough environmental reviews prior to approval of these developments. I believe there are numerous other critical areas throughout the city that may only be identified and safeguarded through thorough environmental reviews before development. The Growth Management Act mandates the protection of critical areas such as forests, habitats, and natural lands and this includes lands within the Urban area. Removing environmental reviews contradicts the requirements of the GMA. I appreciate your attention to this oversight.

As a board member of Spokane Urban Nature, I also agree with the comments they are submitting in support of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4, i.e. "Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats and open spaces as interconnected natural systems that provide flood protection, heat reduction and carbon sequestration benefits including through codes, capital investments, and regional partnerships."

Finally, I strongly support inclusion of a plan to study the impact of infill developments to determine whether or not these developments are achieving the goals intended i.e. increase the inventory of affordable housing. I have heard that several of these developments on the South Hill, which have had

very negative impacts on the neighborhoods in which they were built, have gone into foreclosure because they could not be sold or rented.

Thank you for your attention to these concerns.

Sincerely,

Carol Landa-McVicker
2705 E Mount Vernon Dr
Spokane, WA 99223

509 435-506

From: Katherine Lane
To: Plan Spokane
Subject: PlanSpokane 2046 Drafts EIS Comments
Date: Tuesday, February 17, 2026 7:50:23 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 (See photo). B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 (See photo) shows all neighborhoods will be exempted from environmental review in two phases. C

4. Suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3 (See photo). Existing Hard (Impervious) Surfaces included below.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

- Katherine Lane

From: Stefani VanDeest
To: Plan Spokane
Subject: Plan spokane 2046 draft EIS
Date: Wednesday, February 18, 2026 4:09:07 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk.
Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction. C

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Bradford and Shannon Little
(Please count this as two constituents, two individuals with opinions, voices and votes. Not one, but 2! On behalf of our daughters as well!)
East Central Spokane

From: John Lowe
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 3:17:30 PM
Attachments: Comments on the City of Spokane Comprehensive Plan Periodic Update 2026.docx

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

I respectfully submit for your consideration these comments on the Draft Environmental Impact Study for the City of Spokane Comprehensive Plan Periodic Update 2026 - 2046, prepared December 2025. Please contact me if there are any questions concerning these comments. Thank you.

John Lowe
impactanaly@gmail.com
(509) 378-7003

Comments on the City of Spokane Comprehensive Plan Periodic Update 2026 - 2046 Draft Environmental Impact Study (DEIS), December 2025

Prepared February 18, 2026

John Lowe

Impactanaly@gmail.com

GENERAL COMMENTS

General Comment #1: overall, the document is well-done and informative. The maps are very useful; the basemap and associated layers should be made available online for use with geospatial platforms such as ArcGIS online and Google Earth. It should be possible to zoom in and out, for performing more detailed, neighborhood-level studies and planning. The ability to display multiple data layers should be provided. One example is as follows: the impervious surface layers (Exhibit 3.1-3), hydrologic soil groups layers (Exhibit 3.1-4) and groundwater resources layes (Exhibit 3.1-12) can be used together to identify locations and opportunities to improve recharge through removal or modification of impervious surfaces. A

General Comment #2: considering the specific comments provided below, added mitigation measures are suggested, with one goal being to develop added information for consideration during the next five-year update of the Comprehensive Plan. A formal acknowledgement by the City in the EIS report of these proposed mitigation measures may be helpful in securing support and funding for their implementation from other institutions in the Spokane community. A preliminary framework for these proposed mitigations is presented below: B

- Further studies: C
    - Regional-scale assessment of groundwater conditions including consideration of cumulative effects of withdrawals by multiple users (for example, Spokane County or irrigation districts).
    - Local-scale studies of the potential effects of climate migration on population projections; additional needs created by increased population (housing, employment, water, emergency services)
    - Studies of the improvement to groundwater recharge from reducing the footprint of impervious surfaces (provisional title: “urban groundwater recharge initiative”)
- Citizen science initiatives:

D

    - Workshops for scoping of activities and providing training
    - Environmental monitoring:
        - Soil moisture
        - Carbon emissions: using radiocarbon monitoring of urban turfgrass, developed by University of California, Irvine: https://news.uci.edu/2025/11/03/uc-irvine-scientists-devise-method-for-cities-to-measure-greenhouse-gas-emissions/
        - River monitoring (water temperature, for example)
- Promoting community resilience – translating EIS mitigations and the Climate Risk and Vulnerability Assessment (CRVA) report into actions.
- Outreach:
    - Speakers bureau for outreach to institutions such as the colleges (Gonzaga, EWU, WSU) and news media.
    - Fund-raising workshop to garner support for implementing this framework.
- Governmental efforts:
    - Sponsorship of voluntary activities, including support in locating funding.
    - Identification of other regulatory programs:
        - Conversion of turfgrass to xeriscaping (using the model of the City of Las Vegas's ordinance).
        - A proposed rule to reduce excessive residential water use.
        - A proposed rule to require groundwater management plans for new development (using the model of the State of Arizona).

SPECIFIC COMMENTS

Specific Comment #1: Page 1-18, Section 1.4.1 Earth, Water Quality and Water Resources: With mitigation, what is the ultimate outcome?

The conclusion from the analysis is that following mitigation through the use of project-specific best management practices, there are no significant unavoidable adverse impacts to water resources. As discussed below, there are scenarios regarding population growth and water availability driven by climate change which have not been fully analyzed. Rather than create delay to substantially update the analysis in the Environmental Impact Study (EIS), mitigations have been suggested in the general comments to promote further study, education and monitoring for updating and improving decision-making in the Comprehensive Plan.

E

Specific Comment #2: Page 2-17, Section 2.2.3 Growth Targets and Alternatives, Population, Household Sizes, and Housing Types, Population Targets.

F

For the purposes of the EIS, the population growth in Spokane between 2022 and 2046 is assumed to be an estimated range from 25,157 to 50,650 added individuals, derived using a variety of methods including data from the Washington State Office of Financial Management. These values appear to be lower than the Growth Management Act (GMA) projections in 2022 (OFM, 2026). A visual inspection of the projections graph for Spokane County (https://ofm.wa.gov/wp-content/uploads/sites/default/files/public/dataresearch/pop/GMA/projections2022/gma_2022_high_low_charts.pdf) suggests that the medium (i.e. mid-range) estimate over the next 20 years in Spokane County is something under 100,000 added individuals, compared with the estimate for the City of Spokane of around 25,000. OFM's data would suggest more of the population growth in Spokane County will occur outside the City of Spokane, which might understate the impacts associated with future population growth. F

Suggested changes to the EIS report: Some explanation of the methods used for the population growth projections in the City of Spokane should be added to this section to clarify the population growth projections used in the EIS.

Specific Comment #3: Page 2-17, Section 2.2.3 Growth Targets and Alternatives, Population, Household Sizes, and Housing Types, Population Targets. The population projections take into consideration historical variation in population and parameters to determine the slope of the trajectory in population growth (see for example, OFM, 2025). This appears to assume that future population growth will reflect past trends. There is a growing sense among researchers studying climate change that Earth's climate is now departing from the stable conditions that supported human civilization for millennia, with outcomes that are difficult to predict (Ripple et al., 2026). A geospatial simulation of the implications of climate change on global migration finds that climate change boosts migration from lower to higher-latitude areas. Median (typical) projections suggest that climate change will induce globally a voluntary and forced permanent relocation of 62 million working-age individuals over the course of the 21st century, most of this internal to national borders (Burzynski, et al., 2022). In a study based on scenarios and data developed by the Intergovernmental Panel on Climate Change (IPCC), climate migration driven by sea level rise throughout the 21st century is projected to amplify demographic change in both origin and destination locations. The authors recommend that policies addressing sustainable growth management (affordable housing, services to the aging, public health and infrastructure planning) should anticipate these population changes (Hauer, et al, 2024). Humans and the production of crops and livestock historically have been concentrated geographically in a zone described by a mean annual temperature in air ranging from 11 to 15 degrees C (52 to 59 degrees F), referred to as the human climate niche. The human climate niche will migrate as climate change intensifies; conditions G

would deteriorate in some regions and improve in others. A study based on IPCC scenarios and data calculated how the future population would redistribute under different climate scenarios. Under the worst-case "business as usual" emissions scenario, the changes in the human climate niche might result throughout the 21st century in the migration of billions of individuals, representing roughly 30% of the projected global population (Xu et al., 2020). The online periodical ProPublica reported on a study by the Rhodium Group showing that higher temperatures will drive agriculture and migration northward (Shaw et al., 2020). According to climate maps in ProPublica's report, Spokane County is projected to be a destination for climate migrants. Other researchers dispute the validity of the human climate niche, stating that it fails to capture the main sources of climate vulnerability and unrealistically overstates the impacts on human population distribution (Selby et al., 2024).

While these findings reinforce the uncertainties in 21st century land use planning introduced by climate change, they do not provide information useful for impact assessments specific to Spokane. However, it is possible to say that population growth projections in the EIS based on historical experience may not account for these climate futures, a problem that could affect the reliability of entire impact analysis presented in the DEIS report.

Suggested changes to the EIS report: the discussion in this section should include stronger statements that population projections are based on historical experience and might be underestimated depending on the future course of climate change. Further study is needed to resolve this uncertainty, and, while no revision is proposed for the impact analysis in the current report, mitigation measures are proposed in comments above to develop those further studies and to monitor the impacts of climate migration on land use planning in Spokane.

G

Specific Comment #4: Page 3-20, Section 3.1.1 Affected Environment, Groundwater Resources. Page 3-20 Section 3.1 Earth, Water Quality and Water Resources, Groundwater Resources. As described in the DEIS report, the study area contains a portion of the Spokane Valley-Rathdrum Prairie Sole Source Aquifer, located mainly in Northwest Spokane and Northeast Spokane. Projection boundaries include the 5- and 10-year time-of-travel boundaries, selected for purposes of assessing wellhead protection. Selection of the study area based on the 5- and 10-year travel times seems too limiting for purposes of assessing water quantity and availability. The aquifer boundaries are much larger as described in the aquifer atlas (Spokane County, 2023) and supports multiple users. Assessing the impacts of future growth on water quantity and availability would seem to require a broader geographical assessment of groundwater. How other users outside of the

H

City of Spokane affect water quantity and availability should be considered in analyzing the impacts to groundwater. Studies sponsored by the City of Spokane (for example, GSI, 2024; City of Spokane, 2025) note that water levels in the aquifer could drop below their observed historical levels should the region experience multi-year droughts. The Western United States experienced record-setting drought in the early 2020s, alongside the southwestern megadrought dating back to 2000. According to the National Integrated Drought Information System, this has left Western U.S. water supplies in a perilous position (NOAA/NIDIS, 2026). In August 2025, it was reported that the Spokane River ran dry between Barker and Sullivan Roads. It was speculated this might have been the lowest water level in the river reported historically. The river is hydrologically connected to the Spokane Valley-Rathdrum aquifer. Groundwater withdrawals from the aquifer along with other factors might have been responsible for the river running dry (Callaghan, 2025). H

Suggested changes to the EIS report: sections discussing groundwater or water availability should include an expanded discussion of drought conditions in Spokane (drought is scarcely mentioned in the DEIS report). More text should be lifted up from the CRVA report and incorporated into sections of the DEIS report discussing groundwater and water supply. Further study is needed to better understand the longer-term impacts of climate change on the Spokane Valley-Rathdrum Prairie aquifer, something acknowledged by the City. No revision is proposed for the impact analysis in the current report, however, mitigation measures are proposed in the general comments as discussed above to develop those further studies and to monitor the impacts of climate migration on water availability in Spokane. These further studies should take a broader view of the aquifer (both geographically and in terms of users) including consideration of the cumulative effects of multiple water users on long-term water availability in Spokane. I

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From: Sam Mace
To: Plan Spokane
Subject: Comments on Comp Plan, proposal to do away with environmental review of projects
Date: Wednesday, February 18, 2026 2:50:02 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Re Comp Plan infill, natural area protections:

The proposals for guiding infill are both worrisome and shocking.

A blanket exemption for environment review of housing, infill projects is reckless, irresponsible and terrible for Spokane. I live in East Central where ill-conceived projects have been allowed to move forward without necessary permits (important permits for stormwater, grading, etc), negatively affecting adjacent park values, the neighborhood, the heat index, wildlife habitat. Looking at what the City is allowing with current codes in place, I can't imagine the destruction that would occur with no environment review. The City needs to be adhering to existing codes, environmental review, not doing away with important guidelines. Building Better Neighborhoods?

Spokane needs a tree and natural land inventory. There needs to be priority on protecting existing older, mature tree canopy. Planting trees in parking strips is not a replacement. Protecting existing mature canopy now is critical to managing for climate change, heat index. I live in a lower income neighborhood that already has a high heat index. Mature trees are coming down everywhere. The logging of 2.8 acres above my property and significantly raised the summer heat levels for me. We've lost pollinators and birds. I don't even know how to garden on my property. My mature trees and bushes were heat stressed even last year, so I am now watering more than I ever did before. Not good for the aquifer or the Spokane River. A

Support environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS. B

Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] Here's an area that the City is really dropping the ball. There are grants and monies available from non-profits like Trust for Public Lands to purchase and protect pocket habitats in low-income neighborhoods. As far as I can tell, the City is doing nothing to seek out these kinds of funds. C

Under existing rules and regulations, the City has done a tremendous disservice to my neighborhood. The City has allowed developers to flaunt existing rules. I know that (City staff have privately told me this, as have news reporters) the City and developers think lower-income neighborhoods like ours aren't organized enough to fight back. Please don't make it worse than it already is. D

--
Sam Mace
509-863-5696

From: mimi maloney
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 3:05:51 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

350 Spokane strongly prefers Alternative 3 as the City's selected growth alternative. This support is conditioned on the EIS adequately evaluating cumulative environmental impacts at the comprehensive plan level and ensuring that those impacts are avoided or mitigated through adopted development regulations, consistent with SEPA. A, B

Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits A

The City is considering expanded use of SEPA infill and housing exemptions. Given this approach, 350 Spokane urges the City to establish clear guardrails before broadly applying exemptions, including completing an inventory of existing urban natural assets - such as tree canopy, habitat value, and ecological connectivity C, D

- We oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. E

Thank you for your attention to this request.

Sister Mimi Maloney

3117 East Chaser Lane #260

Spokane, Washington 99223

From: Nathan Marcusen
To: Plan Spokane
Subject: Plan Spokane 2046 Drat EIS Comments
Date: Wednesday, February 18, 2026 11:58:50 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Plan Spokane Team,

I am writing to submit comments on the Plan Spokane 2046 Draft Environmental Impact Statement.

I live and work in Spokane and have seen the deterioration of the Ponderosa pines within and outside the city limits that we once were known for and collectively loved. I have seen the ambivalent destruction of valuable forested land in favor of suburbia, with not a single replacement pine planted. This needs to stop.

I support completing a comprehensive inventory of trees, natural lands, wildlife habitat, and other critical areas. Spokane has a tree canopy goal of 30 percent and strong public support for protecting natural lands. An accurate inventory is necessary to inform and strengthen the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat, and natural lands. A

I support adoption of a strong and enforceable critical areas ordinance to protect wetlands, forests, wildlife habitat, water quality, and other essential resources. As shown in Exhibit 3.3-3, there are natural lands throughout the City that currently lack adequate protection and are in imminent danger. B

I oppose the proposed blanket exemption from environmental review. Exhibit 7 shows that all neighborhoods would be exempted in two phases. Environmental review remains an important safeguard for wetlands, forests, riparian areas, and wildlife habitat within neighborhoods. C

I support limiting any environmental review exemption only to sites that are 100 percent disturbed and impervious, as identified in Exhibit 3.1-3 of the Draft EIS. Development on already hardened surfaces should be distinguished from development on remaining natural lands.

I also support the Climate Resilience and Sustainability Board's recommended Policy Land Use and Zoning 2-4, which calls for protecting, restoring, acquiring, and maintaining urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits through codes, capital investments, and regional partnerships. D

Thank you for considering these comments.

Sincerely,
Nathan Marcusen

Nathan Marcusen | Landscape Designer

Comment # 127

t. 208.667.9402 architectswest.com
210 E Lakeside Ave Coeur d'Alene, ID 83814

Architects West

From: Shenan
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, February 12, 2026 10:39:58 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Thank you for allowing the public to comment on the 2046 Draft EIS. I am commenting as an individual. I support Alternative 3 with the concern that traffic flow and safety be considered prior to development. The road infrastructure in Spokane was not designed to hold the number of cars that will come from the proposed growth. Out of date and inefficient 4 way (or sometimes 6 way) stops need to be converted to roundabouts to improve safety and traffic flow. I am also concerned about structures I see being built on or near seasonal wetlands. This not only leads to flooding concerns for the structures but it removes valuable wildlife habitat for birds, insects, butterflies, and other wildlife. C A B

Shenandoah Marr

From: Molly Marshall
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments"
Date: Monday, February 16, 2026 10:57:51 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I am writing as a resident of the Grandview/Thorpe Neighborhood to express serious concerns regarding the Draft Environmental Impact Statement (EIS), the proposed land use Alternatives 2 and 3, and the associated environmental review exemptions.

Housing Need Must Drive Policy

Recent 2025 housing studies clearly demonstrate that Spokane's housing shortage is concentrated in the 0–80% AMI category, with a deficit of approximately 4,400 units. At the same time, the City shows a surplus in the 80–120% and 120%+ AMI categories. A

Yet the Draft EIS appears to assume that increased private development across all income levels will resolve affordability challenges. There are no enforceable mechanisms identified to ensure that new development will meaningfully address the documented shortage in lower-income housing.

If affordability is the goal, land use decisions, permitting practices, demolition approvals, and incentives must be aligned with demonstrated need—not with generalized growth assumptions.

Demolition and Displacement Concerns B

Both Alternatives 2 and 3 rely heavily on redevelopment and infill, but the Draft EIS does not adequately analyze the impact of demolition. Demolition can lead to:

- Displacement of lower-income residents
- Reduction in homeownership
- Increased rental concentration
- Loss of neighborhood stability

There is an assumption that future anti-displacement policies will mitigate harm, yet no evidence is provided that such protections are enforceable or sufficient. Spokane should not move forward with sweeping zoning changes without first strengthening displacement safeguards.

Neighborhood-Scale Environmental Protection C

Spokane has a stated tree canopy goal of 30%, yet we do not currently have adequate codes to ensure its achievement.

I strongly support the development of a comprehensive Tree and Natural Land Inventory.

Spokane must inventory trees, natural areas, wildlife habitat, riparian corridors, and remaining undeveloped lands to properly inform the Critical Areas Code. The Growth Management Act requires protection of critical areas, forests, habitat, and natural lands. Without a current inventory, we cannot meaningfully comply. C

Enforceable Critical Areas Ordinance

D

An enforceable Critical Areas Ordinance is required to protect:

- Wetlands
- Forests and mature tree stands
- Wildlife habitat
- Riparian areas
- Water quality

The Draft EIS itself (Exhibit 3.3-3) shows unprotected natural lands throughout the City. We cannot responsibly expand development capacity while leaving critical natural systems inadequately protected.

Environmental Review Exemptions

E

I oppose the blanket environmental review exemption proposed in the Draft EIS. Exhibit 7 demonstrates that, in two phases, all neighborhoods would become exempt from environmental review.

This would remove essential safeguards for wetlands, forests, habitat, and riparian areas embedded within residential neighborhoods.

Environmental review exemptions should apply **only** to properties that are 100% disturbed and impervious, as identified in Draft EIS Exhibit 3.1-3. If a site is fully hardened and contains no ecological value, exemption may be appropriate. Otherwise, environmental review remains a critical tool for protecting public health and environmental integrity.

Aquifer Protection and Water Resources

F

It is deeply concerning that the “Earth, Water Quality, and Water Resources” section does not reference the Spokane Valley–Rathdrum Prairie Aquifer, which is essential to our regional drinking water supply.

Growth policy must explicitly address aquifer protection, stormwater management, and riparian health—especially given ongoing reductions in federal environmental oversight.

Transportation and Vehicle Impacts

G

The Draft EIS acknowledges that neither alternative will meaningfully increase transit usage. If population grows without a corresponding shift to transit or active transportation, personal

G

vehicle use will increase.

Where will additional vehicles be parked?
How will emissions be reduced?
How will heat island effects be mitigated if tree canopy declines?

These questions remain insufficiently addressed.

H

Support for Climate Resilience and Sustainability Board Policy

I strongly support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4:

> "Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."

This policy recognizes that natural systems are not obstacles to growth—they are infrastructure. Trees reduce heat, wetlands manage floods, and open space improves air quality and public health.

Land use planning must integrate climate resilience as a foundational principle, not an afterthought.

Conclusion

I

As currently written, Alternatives 2 and 3—combined with sweeping environmental exemptions—risk opening established neighborhoods to redevelopment without sufficient safeguards for affordability, displacement prevention, environmental protection, or infrastructure capacity.

Spokane does not need an either/or approach. The City can adopt the strongest elements of each alternative while:

- Targeting housing production where it is actually needed
- Protecting critical areas and natural lands
- Preserving tree canopy
- Strengthening homeownership
- Preventing displacement
- Aligning growth with climate resilience goals

I urge you to revise the Draft EIS to incorporate enforceable protections and meaningful environmental review before adopting long-term zoning changes that will shape our city for decades.

Thank you,

Molly Marshall
Grandview/Thorpe Neighborhood

From: Ann Martin
To: Plan Spokane
Cc: Gardner, Spencer; Palmquist, Tami
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Saturday, January 3, 2026 12:28:23 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Tirrell: I have been communicating with Spencer Gardner and Tami Palmquist over the past several months regarding the Draft EIS. I sense I may be premature in my concern relative to most specifically SMC Chapter 17C.124.220.D. Downtown West End Special Height District, illustrated in Figure 17C.124.220-1 and Figure 17C.124.220-2.

As I read Alternative 3 in the Draft EIS comments, it appears to give life to language that may allow for increased height for multi-family residential units on this very specific piece of land in Downtown Spokane.
My goal, in short, is that of having the ability to increase the height of a structure on this specific piece of terra firma. It is expensive land on which to build. Sub-surface conditions demand pylons or micro-pile foundations. The expense of that sub-structure foundation system warrants a higher density of units above, in order to create a financial pro forma that works. A

This piece of land is situated so as to be an in-fill amenity in downtown Spokane. I need additional stories to get it to pencil.
I am hoping Alternative 3 may help me get there.

I plan to stop by the Tribal Center area of the lobby of City Hall on Jan 20, when Planning Representatives will be in attendance, to help me figure out the best way to submit my comments relative to my very targeted and specific interest. I am hoping to perhaps visit with you at that time.
In thanks.
Ann H. Martin

From: Ann Martin
To: Plan Spokane; Black, Tirrell
Cc: Palmquist, Tami; Gardner, Spencer
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, January 21, 2026 10:19:55 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Tirrell: Many thanks to the time you spent with me yesterday in the Tribal Room to discuss the best manner for submitting comments at this juncture on the Draft EIS.
You were long on patience with me when I got WAY into the weeds, prematurely,on my concerns. You brought Tim Thompson in to discuss the update to the Development Code.
I am grateful for all your assistance.

Per your suggestion, I am submitting herewith similar comments to those I had previously submitted:
Alternative 3 appears to capture an indepth view of the Downtown core and a re-examination of existing Comprehensive Plan goals with an eye for updates. Alternative 3, woven together with an Alternative 2 examination, has the potential for positive results for the new 2046 Comp Plan. A

It was especially helpful for me to visit with Tim Thompson, who will be on the team for the update to the Development Code. He was encouraging, and I thank you again.
Sincerely,
Ann H. Martin

From: m_dubravka
To: Plan Spokane
Subject: RE: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 6:26:13 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

To Whom It May Concern:

The Draft EIS and the way it is written will harm our neighborhoods, natural lands and tree canopy. WE SHOULD NOT ELIMINATE THE ENVIRONMENTAL REVIW OF DEVELOPMENTS! I support the protection of natural lands and wildlife habitat in the PlanSpokane 2046

I support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. I Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 (See photo). B

3. I oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 (See photo) shows all neighborhoods will be exempted from environmental review in two phases. C

4. I suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3 (See photo). Existing Hard (Impervious) Surfaces included below.

5. I support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships." D

Regards,

Dubravka Martincic
Croatian, Bosnian, Serbian interpreter/translator
WA State Court Certified
DSHS Medical and Social Services authorized

509-863-2548
m_dubravka@comcast.net

From: Stefani VanDeest
To: Plan Spokane
Subject: Plan Spokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 4:03:08 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Teresa McGee
Corbin Park 99205

From: Stefani VanDeest
To: Plan Spokane
Subject: Plan spokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 4:04:39 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Tye McGee
CORBIN PARK 99205

From: Stevie Mcguire
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Tuesday, February 17, 2026 11:45:17 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:
Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A
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If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C
I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Stephanie McGuirey
The South Hill Hospital District

From: Destiny McMillan
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 2:45:29 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Spokane proudly identifies as “Near Nature, Near Perfect,” yet the direction of these policies appears to move us further from the natural beauty that defines our community’s character and identity.

To ensure Spokane truly remains “Near Nature, Near Perfect,” I respectfully ask the Committee to address the following five critical priorities:

Comprehensive Inventory for Informed Policy:

Spokane has set an ambitious goal of achieving a 30% tree canopy, yet we lack the necessary codes and baseline data to make this achievable. A complete inventory of our trees, wildlife habitats, and natural lands must be prioritized. Under the Growth Management Act, we have a responsibility to protect critical areas — and we cannot effectively manage what we have not measured. A

Enforceable Critical Areas Ordinance:

Current protections are inadequate. As demonstrated by the unprotected natural lands identified in Exhibit 3.3-3, we need a strengthened and enforceable ordinance that safeguards water quality, wildlife habitat, wetlands, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions:

I strongly oppose the proposed two-phase blanket exemption from environmental review for Spokane neighborhoods (see Exhibit 7). Removing oversight for wetlands, forests, and riparian corridors places our local ecosystems at unnecessary and irreversible risk.

C

Targeted Exemptions Only:

Environmental review exemptions should apply exclusively to sites that are already 100% disturbed and impervious, as outlined in Draft EIS Exhibit 3.1-3. Protecting remaining permeable and natural surfaces is essential for stormwater drainage, heat reduction, and overall ecological health.

Commitment to Climate Resilience:

I support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. Our urban forests and open spaces must be treated as interconnected natural systems that provide essential benefits, including carbon sequestration, flood mitigation, cooling, and habitat preservation.

D

If development continues without transparency and rigorous environmental review, we risk permanently losing the natural areas that enrich the human spirit, sustain wildlife, and provide clean air and water, resources that are, fundamentally, our birthright.

C

I urge you to uphold the spirit of Spokane's slogan by strengthening, not weakening, our environmental protections. I look forward to your response and to seeing these priorities reflected in the upcoming plans for our city.

Sincerely,

Destiny McMillan

From: Mama Ocean
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 4:54:55 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Greetings,

I am writing to petition to oppose the

PlanSpokane 2046 Draft EIS for the following compelling reasons:

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 below. B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 below shows all neighborhoods will be exempted from environmental review in two phases. C

4. Suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces included below.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships. D

Thank you for your careful time and consideration. Our children and grand children depend on it.

Signed a concerned lifelong Spokane resident.

Erin Meenach

From: Karen Mobley
To: Plan Spokane
Subject: EIS for Comp Plan Comments from Karen Mobley
Date: Monday, February 16, 2026 5:12:59 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Good Morning,

I have been following the development of the EIS and the related planning process. All the way through the process I have been disappointed in a process that mostly is interested in "where to build things" but has paid little attention to "what to leave alone." There are many areas in Spokane that do not need development but preservation and care. Once we mess with the landscape it cannot be returned to what it was before. I am fully aware of the needs for additional housing but I am unable to comprehend how building everywhere without attention to the tree canopy and the natural areas in the city is of greater importance.

I have walked much of Spokane. During Covid, and when I was recovering from cancer treatment, I visited every neighborhood and every neighborhood park. I have been working as a volunteer for Spokane Urban Nature for 4 years and worked on the Spokane Parks Natural Lands Resolution. I have a low to the ground, on foot, relationship to the natural areas, "vacant" lots and the best urban bird watching in our city.

Here are some suggestions:

Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitats and natural lands. — A,B

Support an enforceable critical areas ordinance required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City. — C

Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitats and riparian areas in neighborhoods. — D

Support environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces included below.

Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] — E

Coordinate zoning to tree and natural land inventory. Designate or highlight natural lands and tree inventory in planning documents so planning staff can have full awareness of urban forests and wildlife habitat. Coordinate these efforts with the county and WA Fish and Wildlife so that the planning and development process does not allow destruction of wetlands and sensitive forested areas. — F,A,B

I am particularly concerned for the Latah Valley, Upper Lincoln Park and the surrounding private lands, and areas near to the Spokane River. I am happy to speak with you all about these thoughts if this is helpful.

F,A,B

Best regards,

Karen Mobley, President, Spokane Urban Nature (Artist, Writer, Art Consultant)

From: Tom Mosher
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, December 31, 2025 1:11:04 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

To whom it may concern:

I offer the following remarks as a citizen and NOT a representative of Rockwood South Hill retirement management.

I am a retired City Planner, having worked as staff for Spokane Plan Commission in late 60s/early 70s and for Spokane County Planning from 1976-1997. I have a Bachelor of Architecture and a Master of City Planning.

I have followed the evolution of the Comp Plan update and just spent some time with the draft EIS. I am fully familiar with the EIS purpose and process. As a City Plan Commission employee, I wrote the EIS for the Parkade Parking Garage. In late ’73 I joined Tony Anderson is establishing the local environmental planning firm of Haworth and Anderson, at which I helped DOE draft the WACs for the State Environmental Policy Act. I supervised a NEPA EIS for an expansion of the Portland International Airport, as well as several other EISs for private developments. As a County planner, I oversaw the preparation of dozens of EISs, by consultants, for private developments, including for the Spokane Valley Mall.

I am a resident of Rockwood South Hill retirement community since 2017. ROCKWOOD currently has a waiting list of over 800 persons seeking to reside in the retirement community. Currently ROCKWOOD owns all the property south of and fronting on E 25th Ave and east of SE Blvd, including all of Lacey Ct (except for one lot on the SW corner of Lacey Ct/25th Ave).

Given the constantly increasing wait list for Rockwood and Rockwood’s consultant’s projection that demand will remain high, even after the ‘Boomer bubble’ passes, that there will be a continuing demand for middle to upper income retirees. Rockwood is in a position to expand this type of housing - desirable and much sought-after medium to higher density. A

I believe Lacey Ct properties should be designated by the Comp Plan as medium or higher density housing, followed up with zoning to support medium to higher density by outright zoning or some form of conditional use permit for non-profit retirement housing. South of this property to 27th Ave is all duplex or apartments or office/low density business. Consistent with Alternatives 2 and 3, south of 27th is all business and the apartment complex build by James S Black in the mid to late 60s. North of 25th Ave is all Rockwood PUD with overall medium to higher density housing AND the apartments north of 25th Ave and fronting on SE Blvd. Hence, medium to higher density south of 25th Ave and east of SE Blvd is logical and compatible with the Lincoln Hts neighborhood, as well compatible with Alternative 2 and 3 - and would likely have limited to no opposition. Additionally, Lincoln Park serves as an existing natural buffer to the lower density housing north of 17th Ave. As we all know, Spokane is more and more considered as an ideal retirement destination with: its increasingly milder weather; its excellent (and expanding/improving) public transportation; its cultural, recreational and environmental amenities, etc. Expanding the options for middle to upper income in the form of middle to higher density retirement housing is logical. B

With the vacation of all of Lacey Ct, including all the adjacent Rockwood-owned lots combined with middle to higher density zoning designations, many acres of land would be available to Rockwood to meet the increasing housing demand - already extraordinary as evidenced by existing waiting lists; which increase almost monthly.

Finally, traffic congestion: Many Rockwood residents already choose to exit the property at 23rd Court and Ray Street, due to the hazardous intersection at 25th Ave and SE Blvd. A possible solution for the congestion and high chance of vehicle collisions at 25th Ave and SE Blvd is a traffic control system that could work generally as follows: a traffic signal that would be designed to allow continuous through traffic flow in both directions on SE Blvd, UNLESS interrupted by vehicles waiting on 25th Ave. to turn south or north on SE Blvd. A left turn lane C

C

already exists on SE Blvd for persons heading south and wishing to turn onto 25th Ave. A merge lane also exists on SE Blvd for residents who turned from 25th Ave to head south on SE Blvd. All that is really needed is a slightly modified intersection and an on-demand traffic control light to allow the persons to safely exit 25th Ave onto SE Blvd, briefly stopping the traffic on SE Blvd as needed to allow traffic from 25th Ave to turn onto SE Blvd. This is a very important intersection for the traffic engineers to give advanced thought and planning. With the great increase in housing in south Spokane and the adjacent County land (and including the future South YMCA and George Paras' adjacent 120+ SF housing development), congestion is clearly going to intensify on SE Blvd. Addtionally, school buses turn onto 25th Ave and exit onto SE Blvd. Also, Rockwood has multiple transport vans constantly using the inspection, as well as numerous daily commercial trucks and City refuse trucks. It is conceivable (and apparently was so in the past) that a future regular City bus stop may be at Rockwood, thus further intensifying the need for a 'demand' traffic control light at the intersection of 25th Ave and SE Blvd.

In conclusion, please make every effort to increase the housing density south of 25th Ave and particularly the lots surrounding Lacey Ct. Furthermore, I urge a City detailed traffic study begin for the future upgrade of traffic control/management of the intersection of 25th Ave and SE Blvd.

Thomas Mosher, AICP emeritus
Rockwood South Hill resident

From: Kate Mrgudic
To: Plan Spokane
Subject: EIS draft plan
Date: Tuesday, February 17, 2026 8:32:08 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

i am in support of the position pf 350 Spokane as follows:

-350 Spokane strongly prefers Alternative 3 as the City's selected growth alternative. This support is conditioned on the EIS adequately evaluating cumulative environmental impacts at the comprehensive plan level and ensuring that those impacts are avoided or mitigated through adopted development regulations, consistent with SEPA. A,B

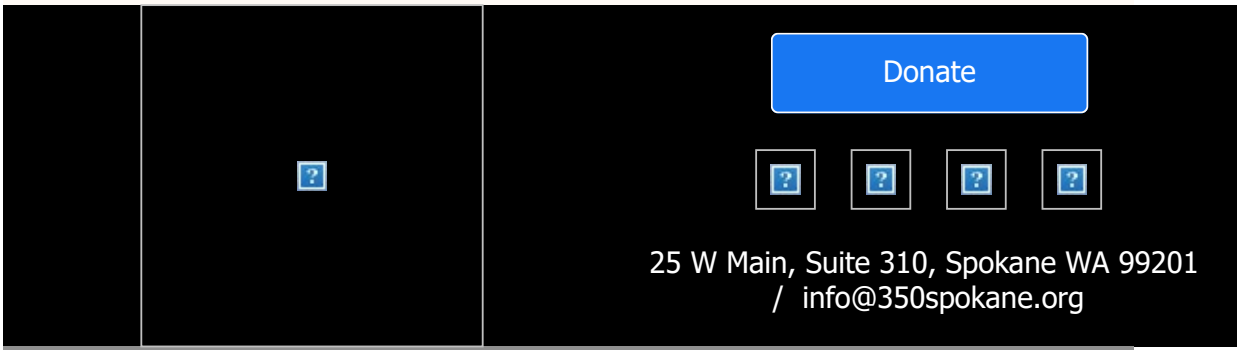
-Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits A

-The City is considering expanded use of SEPA infill and housing exemptions. Given this approach, 350 Spokane urges the City to establish clear guardrails before broadly applying exemptions, including completing an inventory of existing urban natural assets - such as tree canopy, habitat value, and ecological connectivity C,D

- to ensure that infill development does not result in unmitigated impacts to environmental resources within urban neighborhoods

- We oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 in the EIS, shows all neighborhoods will be exempted from environmental review in two phases E

- We Support environmental review exemption only if the proposed development area is 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3.



Kate Mrgudic
509-808-5712

From: Nagel, Mary
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 1:48:40 PM
Attachments: PlanSpokane 2046 Draft EIS comments.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Mr. Black

I've attached a letter containing our comments regarding the PlanSpokane 2046 draft EIS. Thank you for the opportunity to voice our ideas and concerns. We're looking forward to hearing about next steps as the EIS draft moves forward.

Best,
Mary & Dean Nagel

Dear Mr. Black,

Thank you for this opportunity to comment on the PlanSpokane 2046 draft EIS.

We strongly support Goal ECOS 1 and ECOS1-1 to "Establish and support programs, codes, and standards that support the long-term health and maintenance of the urban canopy on public and private lands…" To that goal, we would emphasize and direct attention to closing any loopholes that currently exist which allow for private owners/developers to engage in wholesale destruction of the neighborhood eco-systems that have provided urban canopy and small forest environments for urban flora and fauna. We'd like to refer your attention to the recent "deforestation" and continued leveling of an iconic basalt form at 1111 E. 27th Ave. as an example of a developer slipping through a loophole to "crowd-build" multiple high-end housing units in a neighborhood of classic single homes. A +B

Allowing this type of development in which high-end mixed housing is "infilled" into established neighborhoods is really disturbing to us. Therefore, we do not support Options 2 & 3 as they are currently proposed. These plans will open-up neighborhoods to exploitive and somewhat unregulated development, create congestion, increase the lack of parking for new housing, as well as challenge emergency access into neighborhoods. Also worthy of consideration, is how the dismantling of urban canopy/green spaces and eco-systems will impact the mental and physical health of future generations living in our neighborhoods. C

Perhaps there should be a 4th Option, one that provides more teeth, more defined strategies to protect our urban eco-systems. This 4th option would strategically increase enforcement of restrictions that will reduce the destruction of urban canopy and eco-systems, as well as redefine development codes and regulations that address mixed-use placement in established neighborhoods. This 4th option would also incorporate stronger and more clearly defined oversight processes for development on private property to protect the heritage of trees and ecosystems that have historically supported and sustained us as human beings. D

Thank you for reading this letter and for considering our concerns.

Best Regards,
Mary & Dean Nagel

From: Patricia Nault
To: Plan Spokane
Subject: Plan Spokane 2046 Draft EIS comments
Date: Tuesday, February 17, 2026 12:56:30 PM
Attachments: Draft EIS comments.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Plan Spokane 2046 Draft EIS Comments
Patricia Nault
February 16, 2026

General comments

The primary focus of the EIS document seems to be on where the city will direct housing construction for the next 20 years to accommodate anticipated population growth and remedy current shortage of affordable housing.

Why does it make sense to settle on one one-size-fits-all alternative for the entire city when the 29 recognized neighborhoods that developed in different eras over the past 130 years have different existing built environments, traffic patterns, access to public amenities, terrain, infrastructure issues, and unmet needs? How can a single approach - alternative 2 or 3 - be tailored to responsibly address growth in the same way across very diverse neighborhoods? A

Important aspects of managing growth beyond housing construction are not in the draft EIS:

1. The introductory letter for the draft EIS document notes that “planning for services and infrastructure (e.g., streets, storm water and parks)” is one of the purposes of the Comprehensive Plan. The draft document has descriptions of the current situation and a history of the development of those aspects, but there does not seem to be an actual plan for how services and infrastructure will expand to meet the needs of a larger population and a more extensive built environment. B

2. Although the state has new requirements to address climate change in the Comprehensive Plan, the challenges of growing and building in a way that will protect the population, to the extent possible, from the known and significant danger of wildfires does not seem to be integrated into the draft EIS. Issues for new housing development include adequate emergency evacuation routes and the cost and availability of homeowners insurance coverage in locations where fire danger is elevated and/or response to fires does not meet insurance industry standards. C

3. Water quality and runoff increases are listed as elements of analysis but I was not able to find consideration of water demand related to a growing population, and exacerbated by the expected increasing heat and drought due to climate change, addressed in the draft. D

4. Related to the absence of a plan for infrastructure needs and the increasing demand for water, it seems important to state the need to prioritize maintaining the water distribution system as a preventive measure to avoid losing water to leaks.

Specific comments

After residing in the Latah Valley for 11 years, I am particularly attentive to development issues specific to the western neighborhoods of the city in the wildland-urban interface: Grandview/ Thorpe, Latah Hangman, and West Hills. E

Both of the proposed action alternatives are expected to result in “more growth in Latah/ Hangman neighborhood on vacant land”. See table on page 3-121 of the draft EIS. In recent years there has also been significant interest from developers in land in the Grandview/Thorpe neighborhood.

Growth Management Act Goals listed on page 3-192 of the draft EIS include reducing the inappropriate conversion of undeveloped land into sprawling, low density development, and encouraging efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capital vehicle miles traveled. Neither of these goals are supported by directing growth to Grandview/Thorpe and Latah/ Hangman neighborhoods in their present state of infrastructure development. Both areas are 100% car dependent, and many households have 3, 4, even 5 vehicles: one for every member of the household old enough to drive. E

A paradigm based on hubs or “frequent transit routes” (unless this term includes driving a private vehicle on a public road) has little relevance for areas outside the older, traditional neighborhoods. Growth in the Latah Valley in recent decades has produced suburban-style bedroom communities and disconnected individual developments.

Mixed-use development was not permitted under the Centers-and-Corridors concept, so “third places” to encourage community (churches, cafes, shops, bars, clubs, gyms, bookstores, theatres) are minimal or non-existent. The livability standard of no more than a ten minute walk to a public recreation area does not exist for most residents of the Latah Valley.

There are no neighborhood schools, library, or community center. Public transportation does not serve these neighborhoods. Highways, rock formations, and railroad infrastructure interrupt what might otherwise be a network of connected local streets. Many streets that serve as local thoroughfares or arterials have not been upgraded to modern standards, i.e., they are lacking curbs, shoulders, sidewalks, and bike lanes. Railroad bridges / tunnels do not conform to national minimum height standards for vehicle clearance. F

The water and wastewater systems in some areas have not been upgraded to meet the needs of additional development. The fire station serving this area is a converted house that cannot accommodate the standard array of firefighting equipment. The state Department of Transportation is gravely concerned about traffic safety on US-195 as vehicle traffic to and from new developments steadily increases.

Areas west of Latah Creek (including Grandview/Thorpe, Latah/Hangman, and West Hills neighborhoods) are connected to the downtown area by the I-90 bridge and the 115 year old Sunset Boulevard Bridge which is deteriorating and subject to weight restrictions that prevent garbage trucks and aerial fire trucks from crossing it.

The current state of the infrastructure and public services in this area demonstrates the importance of having a Comprehensive Plan that integrates infrastructure planning and implementation with housing development. As the Growth Management Act prohibits requiring developers to remedy existing deficiencies, it falls to the city to craft a plan for doing so, or to restrict development to land that is not negatively affected by these deficiencies. G

Patricia Nault
6312 S. Brookhaven St., Spokane
Panault@me.com

From: Liva
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 9:42:01 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.

To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is our birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!

Sincerely,

Liva Nayeli
2913 E 15th Ave Spokane, Wa 99223
Spokane south hill

From: Katie Joy Newhouse
To: Plan Spokane
Subject: Plan Spokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 8:27:09 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Plan Spokane,

Thank you for taking my comments about the Environmental Impact Statement specifically relating to Emerson-Garfield Neighborhood where my family and I live. There is a rare and precious feeling of neighborhood still alive here and we want to see it protected for the future.

We are very concerned about the new zoning of our historic neighborhood as a corridor thus allowing for the tearing down of family homes and building of tightly packed condos or townhouses. If there is no way to avoid this we want 80% of it ownable. You know neighborhoods decline otherwise as no ownership means much less care for properties and neighbors. A

Truly, we need low income housing along streets like division, not more tearing up of neighborhoods like this. I hope you fight for neighborhoods like ours. They do more good for the overall health of our community than you may realize. They are worth keeping as neighborhoods with home ownership.
.
Blessings,

Katie Joy & Emil Newhouse

Romans 15:13
May the God of HOPE, fill you with all JOY & PEACE, as you trust in Him, that you may OVERFLOW with HOPE, by the power of the Holy Spirit.

Isaiah 26: 3
He will keep in perfect PEACE, all those whose eyes are focused on Him, because they trust in Him.

Romans 3:23-24
23For all have sinned and fall short of the glory of God, 24 and all are justified FREELY by his grace through the redemption that came by Christ Jesus.

From: Katie Joy Newhouse
To: Plan Spokane
Subject: Fwd: Plan Spokane Feedback due tomorrow!
Date: Tuesday, February 17, 2026 9:30:43 PM
Attachments: Questions and comments on Environmental Impact Statement EGNC.docx

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

I have already emailed some comments in today but wanted to add tha I am in support of all of the questions and concerns that Linda (our neigborhood's Community Assembly Rep) has laid out in the 2 page document below. A

Blessings,

Katie Joy and Emil Newhouse
204 W Euclid Ave
Spokane, WA 99205

Questions and comments on Environmental Impact Statement
Linda L. Carroll, Ph.D.
nominee, Community Assembly Liaison to Plan Commission

The questions and comments in the first section are general ones concerning the Statement and procedures involving it. The second section focuses on specific details.

General Comments and Questions

1. What is the role of Neighborhood Councils and of the Community Assembly, the city's constituted bodies for residents' expression concerning governance issues, in responding to the Environmental Impact Statement and in the choice of the Preferred Alternative by "Community and Decision Makers" (p. 507; Chapter 5 Appendix A, Plan Spokane Community Visioning Engagement Summary, p. 11)? The report utilizes as its basic area units the Neighborhood Council boundaries and relies on Neighborhood Action Plans formulated by the respective Neighborhood Councils.
2. If current mechanisms (e.g. permitting) are inadequate for ensuring that the Preferred Alternative is followed by the private interests that will be building housing, what provisions will the city make for enacting its tenets? For example, what are the City's options if the owner of a parcel of land on/near a bus rapid transit route prefers to leave it as an empty lot (its current state) rather than build affordable multi-family housing on it? (Councilmember Klitzke's idea concerning taxation for vacant properties addresses the issue.)
3. Why is the very important role of the demolition of current housing not mentioned until p. 55 of the Environmental Impact Statement? That statement refers vaguely to "over twice as many housing units" demolished under Alts 2 and 3 as compared to Alt 1--the actual numbers are not given until p. 285 (Alt 1 849, Alt 2 1,697, Alt 3 1,698). That section (Residential Displacement, pp. 284-86) provides a more detailed discussion of projected demolitions. It notes the potential that lower-income residents' rate of home ownership will be reduced by the demolition of single-family owned homes in favor of multi-family rental property. And, while note 9 on p. 284 asserts that "development is more likely to occur on vacant lots or those with no existing homes," it is entirely possible instead that owners of vacant properties on corridors will not be interested in constructing affordable multi-family dwellings. That will then increase pressure to demolish single-family homes in the contiguous quarter-mile included in the corridor designation in favor of multi-family dwellings. The Neighborhood Councils and the Community Assembly should evaluate the very extensive conclusion (p. 303) to this section (3.5): "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."

4. Although the consideration of future exemptions to the thresholds is located at the very end of the file because it was originally a separate document (Appendix E, pp. 594-614 and especially pp. 609-14 of pdf), it carries enormous implications for the Environmental Impact Statement. The projected impact of the contemplated exemptions is extensive. Exh. 6 p. 612 shows how an infill exemption extending the 'corridor' definition to one-half mile on each side of the corridor would affect a number of neighborhoods; for example, all of Emerson-Garfield would become a corridor. Exh. 7 p. 614 shows that if extended to Phase 2, the "SEPA Proposed Infill / Categorical Exemption Area" would include the entire city.
5. Given that the Environmental Impact Statement envisions that the three alternatives will result in no increased use of transit and only a tiny increase in use of active transportation (Chapter 3, section 7, esp. pp. 386, 390, 393, 399), is the City doing enough to reduce the use of personal vehicles that is the source of a large proportion of many pollutants? See pp. 164-65 for some additional possible measures.
6. Given that this is an Environmental Impact Statement, more of the information concerning "Environment, Impacts, and Mitigation Measures" (Section 3, beginning on p. 114 of the pdf) should be included in the preceding two sections (Section 1 "Summary"; Section 2 "Proposal and Alternatives"), which give almost all of their space to issues of housing, jobs, and transportation. For example, Section 1.4.1 "Earth, Water Quality, and Water Resources" does not contain a single reference to the aquifer that is vital to our region.
7. How will the Plan be affected by the current numerous and profound attempts to reduce and eliminate environmental considerations, incentives, and regulations at the federal level?
8. The narrative, much of which is written in general terms, would benefit from examples of the concrete details given in the exhibits.
9. Citizen comments from outreach sessions included in an Appendix showed a wide preference for combining features of Alternative 2 and Alternative 3 rather than choosing one of the three Alternatives presented. What plans are there for making one or more combined models?
10. What opportunities will there be over the twenty years of the alternative's duration for course correction of any problems that may develop?

Comments on specifics (page numbers refer to the union pdf; in some cases, numbers referring to the section of the report are also given).

pp. 88-89 (2.16-17) The authors of the Environmental Impact Statement concerning population stipulate a growth range of 25,157-50,650 (4,000-29,000 greater than the state assumption) based on the assumption that the current household size of 2.33 will continue through 2046. On what research do the authors base their assumption? In the next section, they set forth the statistics on household size by dwelling type, which establishes that the dwelling types that the Environmental Impact Statement proposes to increase correlate with **smaller** households. The assumption that household size will remain the same calls for more **single-family** dwellings.

pp. 89-90 (2.17-18) According to the authors, “it is assumed” that allowing more multi-family housing in certain designated areas means that “over 5,400 attached multiunits could be expected.” What happens if current owners do not want to construct those kinds of housing and do not want to sell to someone who does?

p. 92 (2.20) What land use and development regulations need to be modernized and in what way? Specifics are needed.

p. 93 (2.21) In what ways will the anticipated “unified development code and GIS-based zoning map” be “enforceable”?

p. 93 (2.21) need for examples or specifics of strategies to “simplify and expedite development review and permitting processes while ensuring predictable outcomes and consistent application.” If they occur later in the report, a cross reference is needed.

p. 93 (2.21) “Engage Stakeholders and the Public” What is the role of Community Assembly and Neighborhood Councils, the city's constituted bodies for residents' expression concerning governance issues, especially in the anticipated “Preferred Alternative Selection” by “Community and Decision Makers” (p. 507; Chapter 5 Appendix A, Plan Spokane Community Visioning Engagement Summary, p. 11)?

pp. 114-464 Chapter 3 This is the Environmental Impact Statement proper.

p. 138 more jobs=greater [negative] impact on environment

pp. 145ff 3.2 Air Quality and Greenhouse Gas Emissions

p. 150 from 2016 to 2025, increased population and increased consumption of fossil fuels and refrigerants resulted in increased emissions

p. 155 expansion of road system, such as North Spokane Corridor, will result in higher levels of pollution

p. 157 The report cites three sources for assessing and visualizing pollutant levels in Spokane but does not provide, here or elsewhere, URLs or other means of locating them.

pp. 158-59 in all three scenarios, the large amount of pollutants emitted by energy consumption and vehicles will create air quality issues and burdens throughout the city and especially for those parts which are already suffering because of their proximity to sources of pollution, such as Hillyard, Lincoln Heights, and Chief Garry Park.

p. 160 Given the termination of the federal EV purchase credit, it is unlikely that great reductions of emissions from vehicles will be achieved. If the current mix of internal combustion-EV vehicles remains unchanged, emissions will increase by about 40% by 2046 for all three Alternatives (535,500 to 714,036 Alt 2 or 737,853 Alt 3).

p. 161 and below, esp. 166 Given the termination of clean-energy projects by the federal government, will the state and city clean-electricity mandates remain in place unchanged?

p. 162 “Alternative 2 results in the lowest energy and transportation emissions across all scenarios.”

p. 166 3.2.4 Can the expectation of “[n]o significant unavoidable adverse impacts on air quality and GHG emissions” be maintained in the face of the cancellation of many clean-air projects and incentives by the federal government?

p. 172 numerous threats to habitat and water quality, including by the numerous local dams, high sediment levels, loss of riparian forest, high water temperatures, runoff

from treatments to vegetation for agriculture and yard purposes, stormwater and wastewater, non-native plants

pp. 174-75, 177-80 identification-description of a large priority habitat area that extends around southwest Spokane and areas of the extremely rare and disappearing shrub-steppe habitat vital to certain iconic species in Five Mile Prairie, Hillyard, western portion of West Plains. [We must exert all effort needed to preserve these habitats.]

p. 183 All alternatives predict population growth and therefore increased damage to habitats.

pp. 184-86 Although the conclusions for the three Alternatives are identical ("As a result, **Alternative 1 would result in less than significant impacts to plants and animals**"; "As a result, **Alternative 2 would result in less than significant impacts to plants and animals**."; **"**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**."), a comparison of the three discussions makes it clear that Alternatives 1 and 3 would have greater harmful effects on wildlife habitat than Alternative 2.

p. 219 How is 'underutilized' defined with regard to property upon which more housing could be built?

pp. 221, 223 On p. 221, Corbin Park is listed as both a local and a National Historic District; on p. 223 it is referred to only as a local historic district. Which is correct?

p. 225 The "Existing Transportation-Related Noise" map incorrectly omits Division Street (Division-Ruby couplet) from consideration even though it easily produces as much noise as the Maple-Ash couplet.

p. 226 The list of areas especially affected by noise pollution omits Northwest Spokane, home of the Great Northwest Spokane Street Speedway (Division, Ruby, Post, Monroe, Maple-Ash, Northwest Blvd; Wellesley, Francis, Indiana, Boone, etc.). Under the current mayoral administration and police chief, the issues it generates are being addressed, but it would be prudent for the City to put lasting measures in place.

pp. 232-35 "Land Use Patterns and Compatibility" "Urban Form" important sections for Neighborhood Councils to review

p. 245 "All the alternatives have the potential for significant adverse impacts to cultural resources in the analysis areas."

p. 258 The table evaluates 29 current city policies with regard to their supportiveness of increased housing but gives no list. Which specific policies are these?

p. 266 Commercial Building Conversion: Is the entire building required to be converted to housing or may a part of it remain commercial?

p. 282-83 Exhibit 3.5-33 Housing Action Plan Strategies Advanced Under Alternatives. This section is an important one for Neighborhood Councils to review, as the strategies will impact the neighborhood and neighborhood residents, especially features such as attention to the impact of the short-term rental market on affordable housing, preserving the viability of existing home ownership for low-income residents.

p. 284 What is the factual basis for the claim 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)"? There is a string of parcels with no housing along Division Street

between Mission and Bridgeport that has remained unbuilt even after the city's recent change in designations and zoning.

p. 291 Why is North Division with its string of empty lots omitted from the list of streets with redevelopable properties in Alternative 1?

p. 303 The concluding sentence of the following quotation should be evaluated by Neighborhood Councils and the Community Assembly: "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."

pp. 317 ff Neighborhood and Subarea Plans here and following.

pp. 317-18 Emerson-Garfield.

pp. 337-41 3.6-9 through 3.6.12 The estimates made by the authors of the report as to the effect of each of the three Alternatives in carrying out the Action Plan of each neighborhood that has one. Narrative explanations of those estimates follow.

p. 337 discussion of Emerson-Garfield plan

p. 347 the Level of Service grades consider vehicle movement only

pp. 359-63 Vehicle Network

pp. 487ff **Chapter 5** Appendices containing the materials used

Appendix A These are the reports from the various outreach sessions and contain a record of comments made by attendees, some of which are excerpted here.

p. 503, 506, 510, 514, 518-20, 522-23, 525 "Staff Vision Re-Write B," which includes "cherishing its unique and vibrant neighborhoods," received the most votes (this appears to be a total of the votes at all three district sessions; however, the total number of votes for all three rewrites was only 100) (p. 503). A similar request in the survey resulted in a strong expression of preference for B (p. 506). Survey respondents also added "leveraging existing investment" to desired features of the Plan. Attendees at the District 1 session held at Northeast Community Center supported B (p. 510). Attendees at the District 2 session held at Liberty Park Library supported A, but with C receiving only one less vote (p. 514). Attendees at the District 3 session held at Shadle Park Library supported B (p. 518). They also added "Reuse of history [*sic*, *recte* historic] buildings prior to new development" (p. 519) and "do not let land sit unused/vacant" (p. 520) to the Vision. Attendees at the Community-wide session supported B (p. 522). They added "Focus on [home] ownership to build personal stability and wealth," "How to test the benefits of proposed changes," and "Ensure changes are beneficial to the city at large, not just those heard from" to the Vision (pp. 522-23, 525).

p. 529 "sittable" neighborhoods (places where elderly and disabled may sit); creating (rather than preserving) neighborhood identities; address land speculation (was this

incorporated into Plan documents?); Greater civic engagement, involvement, and transparency.

p. 531 Under suggestions for "Residential Low" designation: "Create a process of neighborhood input on a project-by-project basis for non-standard uses"; "Prioritize adaptive reuse over new development"

p. 531 Under suggestions for "Commercial" designation: "Leverage vacant commercial areas to add business or apartments"

p. 533 "Alternative 2 received the most votes with 25. Alternative 3 came in second with 7." However, many attendees instead of voting commented on combining desirable features of 2 and 3, with the result that "[t]he 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 2, connectedness appealed; in 3 the emphasis on the Center City appealed.

pp. 534, 536 "No mixed-use in neighborhoods, concerned over exploitative development"; "Create protections against displacement in Chief Garry Park around City Line stops" (p. 534); "Recognition of limits to growth" (p. 536)

pp. 540, 541, 544 suggestions from attendees at District 1 "Future Growth and Guiding Policies Community Workshop" (approximately 22 attendees): "More Civic Engagement"; "Incentives for empty properties on Division following BRT implementation"; "Continue partnerships with housing services and neighborhood councils" (p. 540). Alternative 2 preferred (p. 541). "Prioritize policies with city action rather than informational or "encouraging" resident action" (p. 544).

pp. 545, 546, 548, 549, 550 suggestions from attendees at District 2 "Future Growth and Guiding Policies Community Workshop" (approximately 40 attendees): "Don't use broad terms in Comprehensive Plan"; concern about "corporate rental ownership" and request to "Control rents" (p. 545). "Allow neighborhood input on a project-by-project level for other uses"; "Prioritize historic/adaptive reuse over new development (both commercial and residential)"; though Alternative 2 received the most votes, many did not vote but instead identified desirable and undesirable features of the various alternatives, such as that high density is isolating and large developments should have traffic lights at the exit (p. 546); no mixed use in neighborhoods, protect neighborhood from exploitive development (p. 548); "Enable neighborhoods to create more social capital and be able to take action and help issues"; "Need to have an acknowledgement of growth/our limits" (p. 549); "Recognize limits to growth" (p. 550)

pp. 552, 553, 554 suggestions from attendees at District 2 "Future Growth and Guiding Policies Community Workshop" (approximately 40 attendees): "for elderly and disabled residents, walkable also means sittable"; "sidewalk safety (e.g. electric scooters and conflicts with pedestrians" (p. 552); "Density transition: no high-rise next to single unit homes"; "Vacant lots, parking lots sitting unused" (p. 553). Although Alternative 2 received the largest number of votes, most attendees instead highlighted desirable features of various alternatives: repeated emphasis on development of downtown; preference for preservation of historic buildings, revitalization and reuse; "Like a multi-block approach to intensities (like Alt 3 downtown) over less depth along transit lines" (p. 554)

pp. 559, 561, 563, 564 suggestions from attendees at City-Wide "Future Growth and Guiding Policies Community Workshop" (approximately 35 attendees): "Address land speculation" (p. 559). Although Alternative 2 received the largest number of votes, most attendees preferred to comment on desirable features of the various alternatives (p. 561). "On Washington, Howard, and Post, flip bike lane and parking"; "Push Monroe Road Diet down to Kendall Yards" (p. 563). Various suggestions to preserve natural green areas, parks, and animal species (pp. 563-64).

Appendix E Environmental Review Exemptions to Promote Infill Development and Housing, prepared by BERK Consulting (i.e. the consultant whose field of expertise is housing, not the two consultants whose fields of expertise are aspects of the environment).

p. 594 refers to exemptions from new environmental review of development where "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": this exemption is based on probability, not on verified facts; new development could result in new environmental impacts

p. 596 how are "adequately" and "non-significance" defined?

p. 598 Exhibit 2 gives an outline of the City's current choice of intermediary amounts of residential units, commercial units, and excavation/landfill but then states "The City could adopt higher thresholds, which could vary by use or different geographic areas, and mixed-use projects." See pp. 610ff Potential Infill Exemption Location for areas where there is the greatest reason for the City to adopt higher thresholds.

pp. 610ff Potential Infill Exemption Location. It is clear from Exhibits 4, 5, 6, and 7 in this section that the areas of the city that will most likely be considered for the first exemptions are located in neighborhoods developed in the early 20th century and that are currently residential with predominantly single-family housing. Exh. 7 makes it clear that if the city moves to Phase 2, the entire city will be included in the "SEPA Proposed Infill / Categorical Exemption Area."

From: Judy Noll
To: Plan Spokane
Subject: Planning proposal changes
Date: Wednesday, February 18, 2026 10:12:29 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

---------- Forwarded message ----------
From: **Judy Noll** <junecatdancer@gmail.com>
Date: Wednesday, February 18, 2026
Subject

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:
Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A
Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B
Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C
Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.
Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D
If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, privide wildlife habitat, ensure clean air and water, which IS our birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C
I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Judy Noll
3902 E. 13th

From: Jennifer Ogden
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Sunday, February 15, 2026 4:50:42 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Mayor Brown and Planning Department: While I applaud your efforts to increase building housing units in Spokane, thus far the projects I have seen in District 2 seem to only be for the upper income population. Condo units that are built for $600,000-$1 Million do **nothing** to help our housing shortage.

What should be happening instead is the renovation of existing older structures, and downtown unused office space, for worker housing and low income individuals with jobs. Even if those units have to be subsidized, the economic benefit of creating affordable housing so close to our downtown core can be realized by the resulting positive activity, customers shopping, dining and seeking entertainment downtown, and this can have a multiplying effect. Our teachers, symphony musicians, waitresses, cooks and other service providers should be able to live in the city in which they work. Subsidized or affordable housing units close to our economic center is smart government, results in more tax revenue, safer streets from positive activity and a vibrant downtown culture that attracts yet more business and customers. Providing affordable housing downtown could reverse the continued vacancies that are growing on 2nd Avenue, for example. A B

Furthermore, providing incentives to homeowners to preserve their existing healthy trees assists Spokane in reaching its 30% canopy goal, since planting new, younger trees will set back that goal by decades. Young trees simply take too long to reach that maximum height benefit, if we allow the cutting of mature trees. Please encourage the preservation of existing mature trees by developers as part of the value, the assets of their lot. Heat zones and climate change issues are mitigated by these carbon capture giants. C

Please do not allow further expensive « infill » modern construction in areas in which the units do not match the aesthetics of their area, and do nothing to assist with our housing shortage. Real solutions mean constructing/renovating units for those making $150,000 or less in income. Utilizing the older homes that might be vacant as multiple family housing (« Boarding houses" in the old days) assists in meeting people where they are economically, while preserving the unique history of our city and region. Providing affordable housing for those folks, in older structures that could benefit from being properly maintained and used, will benefit us all. D

Thank you for reading this!

Jennifer Ogden
Spokane

From: Dave Ohman
To: Plan Spokane
Subject: Please include me in announcements
Date: Thursday, March 5, 2026 9:33:23 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

We need to make sure we are incentivizing residential and commercial growth, lessen tax burdens, give incentives and think big… we cannot keep losing to Idaho for jobs and housing. Period. Invest in downtown and move homeless out… thanks

A, B, C

David Ohman
CEO
Northwest Trends
www.NWTrends.us
509.921.9677

From: Bre Orcasitas
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Friday, February 13, 2026 10:37:19 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hi, there. I'd like to start by saying that I've lived in many places around the country, and Spokane is doing so many things right. I really appreciate the number of parks, their size, and how well they're maintained. I appreciate the libraries, the offerings from the library, the Hive, and the free community events that the city puts on throughout the year. I love that there are a number of powwows to attend each year to celebrate the heritage of this geographic area. I am grateful that downtown Spokane is vibrant with businesses, large events, and public gathering spaces like the ice ribbon and riverfront trail. I live on the South Hill, and in this neighborhood specifically, the old-growth tree-lined streets are phenomenal, and keep a connection with nature that is crucial. I also love the accessibility of the bluff trail. A

As far as recommendations are concerned, here is my list:

1. Wildfire preparedness. My career has been as a wildland firefighter, and the most beneficial thing that can be done to prevent intense wildfires is to regularly host prescribed burns, especially in the areas bordering communities. Not only that, but it is of great benefit to the ecosystem, and so would be positive for the flora and fauna as well. This important work would need to be paired with education points for our community. Most people don't understand the positive benefits of fire on the landscape, and so it would be very important to offer PSA ads to help community members better understand the importance of using that tool. B

2. Environment and Human Health. Without a healthy ecosystem, we can't have healthy humans. Clean rivers matter, clean drinking water matters. Keeping the waste-to-energy facility going is important. Planting more trees, protecting wildlife habitat, implementing restrictions on water usage (Watering lawns. This goes for the city as well. The amount of water dumped onto Cannon Hill Park's grass is obscene. It's like walking through a bog in the middle of summer), beefing up the recycling program (can we get a Ridwell facility here?), offering a city compost program, (I know we can use the brown bins, but they are actually pretty spendy) and promoting more environmental education for youth AND adults. Help people to understand the significance of their impact, and how crucial the environment is to our individual health and wellness. C D E F

3. Public transportation. The bus system seems pretty efficient, and I like that they use clean energy. My husband (who is a former city planner) came across a map of Spokane and the surrounding area showing the trolley lines, and just how far they extended outside the city. It looked incredible. I'm curious if the city has considered reviving the trolley system in the city? I was just in New Orleans last Spring, and even a few through lines in the heart of the city could be of great service to community members. G

4. I recognize that the issue of homelessness in Spokane is very complex, and I won't even pretend as if I have a solution. I've been living in Spokane for 3 years now. When we first arrived, the homeless population was more or less centralized to a couple of square blocks, and since then, it has scattered throughout parts of the city that are more heavily used by H

H

downtown patrons. My main concerns with this are safety, vandalism, and trash. I am a very environmentally conscious person, and the amount of trash that is widespread from encampments really grates on me. My family goes around and picks up trash every couple of months, and on more than one occasion, we've come across needles, which is obviously extremely unsafe. This doesn't even speak to the amount of trash that wildlife probably ingests, and the fact that it's just an eyesore in general. If I could advocate for anything, I guess it would be a policy where people are sorted so they can either accept help through one of the many local programs to get them housed, go to a rehab facility, a mental health facility, or to jail, depending on the circumstance. Austin, Texas came up with a program that has seemed to work quite well for them. Maybe that's something for Spokane to take a look at? https://mlf.org/community-first/ It doesn't have to be to this scale necessarily, but maybe utilize this concept to some degree?

My major concern on this topic is that if action isn't taken, 20 years from now, Spokane could be severely impacted in a very negative way. I foresee people refusing to go downtown anymore, which means lots of loss of business, and large event attendance would dwindle to the point that Spokane wouldn't be able to host things like Bloomsday or Hoopfest. I already feel surprised by how many people I hear say that they won't go downtown because of the current homelessness issue.

Thank you for accepting public feedback in your planning process. I appreciate the inclusion.

Cheers-
Bre Orcasitas

From: Christi Ortiz
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Monday, February 16, 2026 1:17:50 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

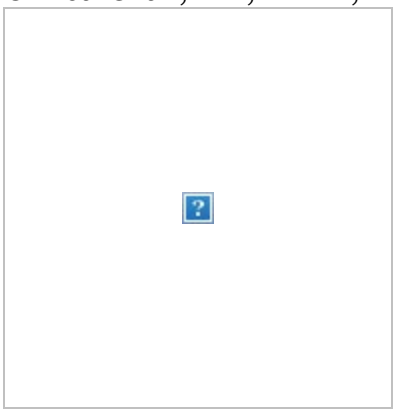
Dear Planning Committee,

We are reaching out on behalf of our voiceless inhabitants in the remaining natural areas of our city which add so much life and joy and beauty to our city. It's one of the things people love most about our city and losing these essential natural areas would be devastating. A

We are in favor of the need for more affordable housing and they are many ways to solve this challenges and creatively work within already developed areas to increasing housing capacity.

A quick solution is usually not the best solution long term. Please don't sacrifice essential natural resources that our city and people and other inhabitants need in this time of desperation, there is always another way. It may take more coordination and out of the box thinking but it can be done and for the sake of everyone has to be done. We can't afford to lose these precious areas to development.
Thank you for your hard work and consideration,
Sincerely,
A beloved resident of Spokane

Thank you,
Christi Ortiz, MA, LMFT, RHC-III



- "All know that the drop merges into the ocean, but few know that the ocean merges into the drop". -Kabir

From: Mike Petersen
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 1:50:40 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Greetings,

Below are my comments on the City of Spokane's Draft Environmental Impact Statement (EIS) for the PlanSpokane Comprehensive Plan.

I support Alternative 3 as the City's selected growth alternative. This support is conditioned on the EIS adequately evaluating cumulative environmental impacts at the comprehensive plan level and ensuring that those impacts are avoided or mitigated through adopted development regulations, consistent with SEPA. Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits. A, B

The City should work to protect existing tree canopy, wildlife habitat and wildlife corridors: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. The Plan should schedule an inventory of trees and natural areas and identify critical wildlife habitat. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. C

The City should ensure that infill development does not result in unmitigated impacts to environmental resources within urban neighborhoods. The City is considering expanded use of SEPA infill and housing exemptions. I oppose the blanket Environmental Review exemption, which would not protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. D

Exhibit 7 in the draft EIS, shows all neighborhoods will be exempted from environmental review in two phases. I support the environmental review exemption only if the proposed development area is 100% disturbed and 100% impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces. E

I think the Plan update should call for a survey/report on potential development where existing buildings, paved or cleared lots exist in the Phase 1 infill area. Once that is determined, those would be the priority for development. It would also inform the City and the public about how these sites would help meet future housing needs. I support fast tracking the permitting for 100% impervious sites. F

I also support additional bonus density for any development within a quarter of a mile of the transportation corridors if the sites are 100% impervious. In addition, I support a bonus density if there are at least 10% and/or 20% of the unit units are "low income". E, G

Thank you for the opportunity to comment.

Mike Petersen

1817 W Gardner Ave.
Spokane, WA 99201

From: Mike Petersen
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 1:56:28 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Greetings,

Below are my comments on the City of Spokane's Draft Environmental Impact Statement (EIS) for the PlanSpokane Comprehensive Plan.

I support Alternative 3 as the City's selected growth alternative. This support is conditioned on the EIS adequately evaluating cumulative environmental impacts at the comprehensive plan level and ensuring that those impacts are avoided or mitigated through adopted development regulations, consistent with SEPA. Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.

The City should work to protect existing tree canopy, wildlife habitat and wildlife corridors: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. The Plan should schedule an inventory of trees and natural areas and identify critical wildlife habitat. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands.

The City should ensure that infill development does not result in unmitigated impacts to environmental resources within urban neighborhoods. The City is considering expanded use of SEPA infill and housing exemptions. I oppose the blanket Environmental Review exemption, which would not protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods.

Exhibit 7 in the draft EIS, shows all neighborhoods will be exempted from environmental review in two phases. I support the environmental review exemption only if the proposed development area is 100% disturbed and 100% impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces.

I think the Plan update should call for a survey/report on potential development where existing buildings, paved or cleared lots exist in the Phase 1 infill area. Once that is determined, those would be the priority for development. It would also inform the City and the public about how these sites would help meet future housing needs. I support fast tracking the permitting for 100% impervious sites.

I also support additional bonus density for any development within a quarter of a mile of the transportation corridors if the sites are 100% impervious. In addition, I support a bonus density if there are at least 10% and/or 20% of the unit units are "low income".

Thank you for the opportunity to comment.

Mike Petersen

1817 W Gardner Ave.
Spokane, WA 99201

From: h p
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, March 5, 2026 11:51:56 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

After reviewing the Plan Spokane documents, I support Alternative 3. Its focus on "growth in downtown, regional hubs, and areas with greatest investment in transit and transportation" as well as increased employment opportunities best serves our community moving forward. A
Thank you,

Heidi Peterson
Homeowner
2321 W Clarke Ave
99201

From: Sally Phillips
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, March 5, 2026 10:02:06 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Thanks for the opportunity to comment. I like Option 2 most, with the emphasis on residential business, and business hubs. A

I like the Option 3 job projection numbers, but am skeptical that employees will be persuaded in large numbers to use public transportation to get to West Plains jobs. B

Option 2 also has the advantage that it is based on previous Centers and Corridors public comment. A

I am happy that all choices mention streamlining getting permit approval, and that we have gotten away from single residence zoning. C+D

Sally Phillips

From: Joshua Porter
To: Plan Spokane
Subject: SPOKANE URGENT ALERT: Action Required By Wednesday, Feb 18
Date: Wednesday, February 18, 2026 10:44:40 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear PlanSpokane Team,

I am writing to submit comments on the PlanSpokane 2046 Draft Environmental Impact Statement. I urge the City to take the following positions to protect Spokane's natural lands, tree canopy, and wildlife habitat:

1. Support a Tree and Natural Land Inventory. Spokane has a 30% tree canopy goal and strong community support for natural land protection, but lacks adequate codes to achieve it. An inventory of trees, natural areas, and wildlife habitat is necessary to inform a critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat, and natural lands. A

2. Support an enforceable Critical Areas Ordinance. Unprotected natural lands exist throughout the City, as shown in Exhibit 3.3-3. A strong, enforceable ordinance is essential to protect wetlands, forests, habitat, water quality, and riparian areas. B

3. Oppose the blanket Environmental Review exemption. As shown in Exhibit 7, all Spokane neighborhoods would be exempted from environmental review in two phases. This threatens critical areas citywide and should not proceed as written. C

4. Support an Environmental Review exemption only for parcels that are 100% disturbed and impervious, as identified in Draft EIS Exhibit 3.1-3. Exemptions should be targeted, not blanket.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4, which calls on the City to "protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits." D

The Draft EIS as written will harm Spokane's neighborhoods, natural lands, and tree canopy. I urge the City to revise it accordingly.

Thank you for considering these comments.

Joshua
Spokane, WA 99205

From: Timothy Potts
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 4:38:12 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I support Alternative 3 in the Draft EIS Summary. | A

Tim Potts

From: Agnes Reizik
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 1:48:34 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello,

I OPPOSE the City of Spokane in their intentions to eliminate Environmental Review of developments to encourage infill in all parts of the city.

I am IN SUPPORT of protection of natural lands and wildlife habitat in the PlanSpokane 2046 Draft Environmental Impact Statement (EIS) and urge you to do the same.

Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. B

Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 (See photo). C

Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 (See photo) shows all neighborhoods will be exempted from environmental review in two phases. D

Suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3 (See photo). Existing Hard (Impervious) Surfaces included below.

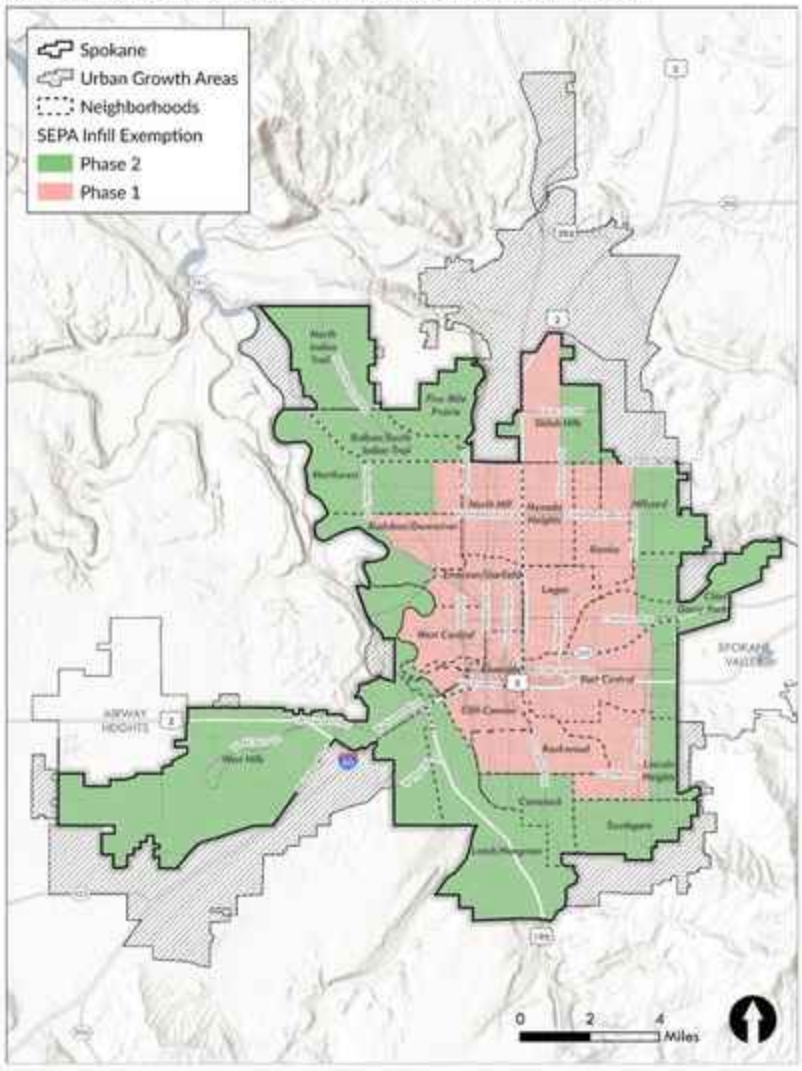
Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] A

Thank you,

Agnes Reizik

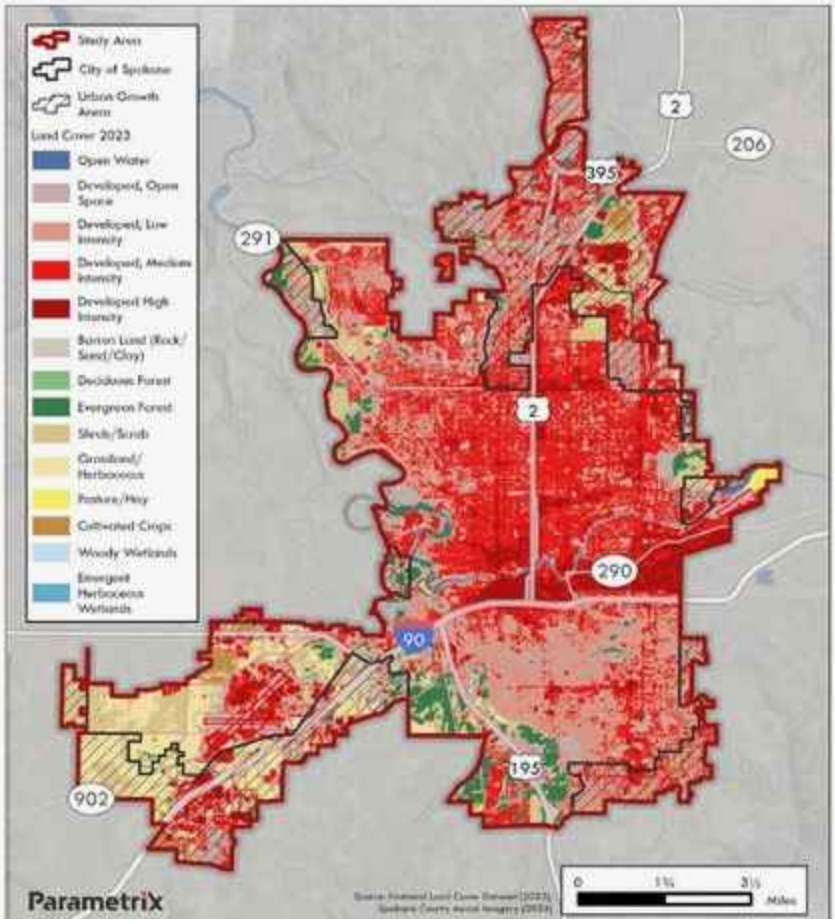
Cheney, WA 99004

Exhibit 7: Phased SEPA Proposed Infill /Categorical Exemption Area



Source: City of Spokane, BERK, 2025.

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



From: Mark Rhodes
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 2:16:06 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:
Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A
Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B
Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C
Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.
Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D
If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C
I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,

Be who you are and say what you feel
because those who mind don't matter
and those who matter don't mind.
—Dr. Seuss

RHODESWORK
Mark Walker Rhodes
311 East 26th Avenue
Spokane, WA 99203-2423
208-503-6275 Phone

509-701-0830 Cell
mark@rhodeswork.com
http://rhodeswork.com/
http://www.engsw.com/mark-rhodes/

From: Saul Rip
To: Plan Spokane
Subject: EIS comments
Date: Thursday, March 5, 2026 3:17:30 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I see several areas where additional fees are proposed to fund the mitigation strategies.

Any additional fees will raise the costs for development, and will push more developers to Idaho where the regulation is more lax, and there is no state energy code. A

These climate considerations are good fir the environment, but will reduce the number of development projects overall. B

Any future housing I build will not be in Washington.

From: Erin Rising
To: Plan Spokane
Subject: I speak for the trees
Date: Tuesday, February 17, 2026 8:19:11 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

SPOKANE URGENT ALERT: Action Required By Wednesday, Feb 18.

The City of Spokane intends to eliminate Environmental Review of developments to encourage infill in all parts of the city. The group Spokane Urban Nature asks that you send an email supporting protection of natural lands and wildlife habitat in the PlanSpokane 2046 Draft Environmental Impact Statement (EIS). Comments must be submitted via email to PlanSpokane@spokanecity.org by 5 p.m. on February 18, 2026. Emails should include "PlanSpokane 2046 Draft

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 (See photo). B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 (See photo) shows all neighborhoods will be exempted from environmental review in two phases. C

4. Suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3 (See photo). Existing Hard (Impervious) Surfaces included below.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

Use your own words, or just copy the talking points and Comments must be submitted via email to PlanSpokane@spokanecity.org by 5 p.m. on February 18, 2026.

Yours Truly,
Erin Heuvel

From: Leilani Robidouxsot
To: Plan Spokane
Subject: Near Nature, near Perfect
Date: Wednesday, February 18, 2026 5:35:48 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the natural beauty that defines our community's identity.

To ensure Spokane remains "Near Nature, Near Perfect," I am asking the Committee to address the following five critical areas:

1. Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas; we cannot manage what we have not measured. A

2. Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

3. Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

4. Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

5. Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing the natural areas that enrich the human spirit, wildlife habitats, and the clean air and water that are our birthright. I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city.

Sincerely,

Leilani Robidoux
4008 E 12th Ave
Spokane, WA 99202

From: Danyelle Robinson
To: Plan Spokane
Subject: Draft EIS
Date: Wednesday, February 18, 2026 9:50:30 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!

Sincerely,
Danyelle Robinson

43 E Weile Ave, apt 354
Spokane, WA 99208
(509)723-5062

Sent from my Galaxy

From: LJ Rodriguez
To: Plan Spokane
Cc: Wilkerson, Betsy; Dillon, Paul; Telis, Kate; lisabrown@spokanecity.org; lbrown@spokanecitt.org
Subject: Infill Exemption
Date: Wednesday, February 18, 2026 3:04:02 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

This proposal is in no way acceptable. The SEPA process is the only way for the public to get notice (sometimes) and comment on projects prior permitting. It's already difficult enough for concerns to be heard unless you have $$$ to throw at the process. It's pretty hard for a community to come up with the $$$ necessary, particularly in the allowed timeframe. Your "do what you want" comprehensive plan is already turning community neighborhoods into areas with a high density of strangers who care nothing for each other. Replacing affordable (relatively) homes with big box housing occupied by people who have no personal (or $) invested in the community. This, along with the revisions of the last few years are not limited to affordable housing so it's not about that crisis. It's bait and switch politics at its worst. You are destroying urban forests and historic homes. At the same time, spending tax dollars to plant more street trees. You are not investing in infrastructure upgrades necessary to adequately support increased density. Required developer contributions to that infrastructure are laughable compared to costs. This does not make Spokane a better place to live. This approach to development is short-sighted and destroys the very things that make Spokane great and appealing. Sooner than later, there will be no one to fill those big boxes that were built because you have destroyed what made people come here and we will have an abandoned, run-down urban core no one will want to live in.

A

B

C

D

I could give you specifics and examples but I seem too only discover these proposals just before the deadline (while you and the developers have been working on it for years) so this is the best I can do.

Lori Rodriguez
Mamama911@msn.com

Get Outlook for iOS

From: LJ Rodriguez
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 4:10:49 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.

To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by C

strengthening, rather than weakening, our environmental protections.
I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Lori Rodriguez
814 E 9th Ave
Perry District
East Central Neighborhood

From: Nicole Ronningen
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 1:52:35 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Please continue to prioritize Environmental Review of developments! Please support Tree and Natural Land Inventory according to the Growth Management Act by taking an inventory of trees, natural areas, and wildlife habitats. A

Support an enforceable critical areas ordinance in order to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City that need your protection. B

Please oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. C

Please support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 to ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

Please support the environmental review exemption only if 100% disturbed and impervious. C

Thank you for your support of our natural resources and the Land we are currently stewarding.

To Our Future Generations,
Nicole Ronningen

From: Feather E.
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 12:48:09 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:
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Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B
Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C
Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.
Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D
If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C
I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Sevven Rookwood
West Central Spokane

From: Debbie Rowe
To: Plan Spokane
Subject: Plan Spokane 2046 EIS
Date: Wednesday, February 18, 2026 3:36:23 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Support Tree and Natural Land Inventory:
Inventory is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests,habitat and natural lands. There are many unprotected natural lands throughout the city. Please support the Climate Resilience and Sustainability Board's recommended Policy Land Use and Zoning
2-4.

A

B

Thank-you,
Deborah K Rowe
Spokane Urban Nature

From: Hal Rowe
To: Plan Spokane
Subject: Plan Spokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 3:51:53 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

To whom it my concern,

I am a resident of Spokane for over 30 years.
The city of Spokane is blessed with many areas where residents can easily access a nature experience.

I urge The City of Spokane do all it can to protect these areas for the health of our city.

1 Please support a Tree and Natural Land Inventory. Trees supply cooling for our city and thus is especially important as our summers become increasingly hotter. Spokane has many pockets of Nature that improve the quality of living by being here. These should be inventoried. A

2 Please support a Critical Areas Ordinance to protect natural areas. We have many special areas that provide renewal for our states of mind and habitat for other creatures B

3 Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Remember the phrase Near Nature, Near Perfect. C

4 Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 D

I am a retired Registered Nurse who worked in the field of Mental Health with children and adolescents. Contact with nature is important for a healthy mental state. The growing field of Ecospychology addresses this. E

Besides having natural areas provide a place for renewal for humans it is also important in these times of impending increased environmental destruction to mantain natural areas for their value to the health of other species and our planet.

Sincerely,

Hal Rowe
1528 E. 10th Ave
Spokane, WA
98202

Sent from my Verizon, Samsung Galaxy smartphone

From: Amy Dawley
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 4:42:53 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Good afternoon,

When I worked on the City's Sustainability Action Plan in developing the Natural Environment and Water Resources sections, our group was challenged to find inventory data from the city for Conservation Lands/ Areas. It seemed possible that biodiversity within natural areas or conservation areas had not been evaluated at that point. I don't know if that has since changed, and I understand the funding mechanism challenge of this. But it is difficult to manage the natural environment if that environment hasn't been evaluated ecologically. A

A few concerns related to the Environmental Review exemption under the infill priority:

- Smaller, high-value ecological areas (like pockets of mature trees or habitat corridors) may be developed more quickly, resulting in a loss of urban biodiversity.
- Individual projects might not require a detailed environmental checklist, potentially allowing, for instance, tree removal or impervious surface increases in smaller, overlooked (but ecologically important) natural patches.
- Unclear to me if infill exemptions are generally limited to already developed or disturbed areas. B

I also support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] C

Thank you for your consideration,
Amy

Amy Rusev Dawley
1220 E Christmas Tree Ln
Spokane, WA 99203
619-952-3568
amydawley@gmail.com

From: Terra Scanlan
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 6:23:56 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Good morning,
I am writing to plea Spokane to not eliminate environmental review. I have lived in Spokane most of my life and I now have four daughters that are being raised here. I have seen how Spokane's environment has changed within my lifetime. We have significantly less snow and part of summer is now spent indoors avoiding wildfire smoke. Protecting the environment is not an option. This earth is where our children and their children will age. Please consider Alternative 3 as the City's selected growth alternative. A B

Thank you,

Terra Scanlan

From: PA SCHUBACH
To: Plan Spokane
Subject: LANDSCAPING
Date: Thursday, March 5, 2026 10:34:22 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I have two issues that I would like to address, not sure how it dovetails into your Plan. Years ago, No Market St was widened from two to four lanes from Euclid to Frances. Along both the east & west curbs trees were planted & an underground irrigations system installed (all supposedly for "traffic calming"). Well, all that effort & cost lasted a few years. The irrigation system got forgotten to be turned on annually & through shear determined willpower a couple of the trees still exists, not sure they are even the original ones planted. It was a terrific idea & greatly welcomed. I would like to see it restored. A

A few years ago, Illinois Ave from Market, west to Perry was resurfaced (finally) & a curb separated jogging/bike path created on the south side. Between the bike path & the railroad tracks is a strip that needs landscaping to enhance the terrific panoramic view of the city & "traffic calming". When I say "terrific panoramic view" that is no exaggeration. The view from Sunset hill on the west to the Idaho mountains on the east is not to be had on any other drive in the city, a neglected valuable city asset. B

Over all, any opportunity to take advantage of landscaping ads to a positive environmental impact, and enhancement to property values. If you are still with me, I appreciate your endurance & willingness to listen to me.

Richard Schubach
509 255 3874
richardschubach@hotmail.com
2809 E. Illinois
Spokane WA 99207

From: Riley Schultz
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 9:13:48 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dearest Spokane City Leaders,

Below are the points highlighting the importance of our trees here in the city! We are recognized as a tree city! Our natural habitats are so important for our city. Please do not let this happen with our trees.

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 below. B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 below shows all neighborhoods will be exempted from environmental review in two phases. C

4. Suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces included below.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships D

Riley Schultz

Spokane city resident and business owner,

5122 E. Union ave Spokane wa 99212

From: Elisabeth Schumacher De Donato
To: Plan Spokane
Subject: Re: Plan Spokane 2046
Date: Tuesday, February 17, 2026 4:30:34 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

So sorry!



A smile is contagious! -Elisabeth

On Feb 17, 2026, at 4:08 PM, Plan Spokane <eraplanspokane@spokanecity.org> wrote:

Hello Elisabeth,

I am following up on your previous email with comments on the Draft Environmental Impact Statement (DEIS). I notice you referenced exhibits and/or photos in your comments, however no exhibits were included in your email. Please provide a copy of the referenced exhibits and/or photos if you would like them to be included as part of your comments on the DEIS document.

Thank you,

Hollis Staal (they/them) | City of Spokane | Planner II | Planning & Economic Development | hstaal@spokanecity.org | 509-625-6854 | spokanecity.org
Help shape the future of the City of Spokane! Learn more about PlanSpokane 2046 at PlanSpokane.org

This email is subject to Washington State Public Records Act, Chapter 42.56 RCW, and may therefore be subject to public disclosure.

-----Original Message-----
From: Elisabeth Schumacher De Donato <lissyshoe@hotmail.com>
Sent: Tuesday, February 17, 2026 7:46 AM
To: Plan Spokane <eraplanspokane@spokanecity.org>
Subject: Plan Spokane 2046

[CAUTION - EXTERNAL EMAIL - Verify Sender]

To whom it may concern in regard to future environmental impact of Spokane area.

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical

A

areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 (See photo). B

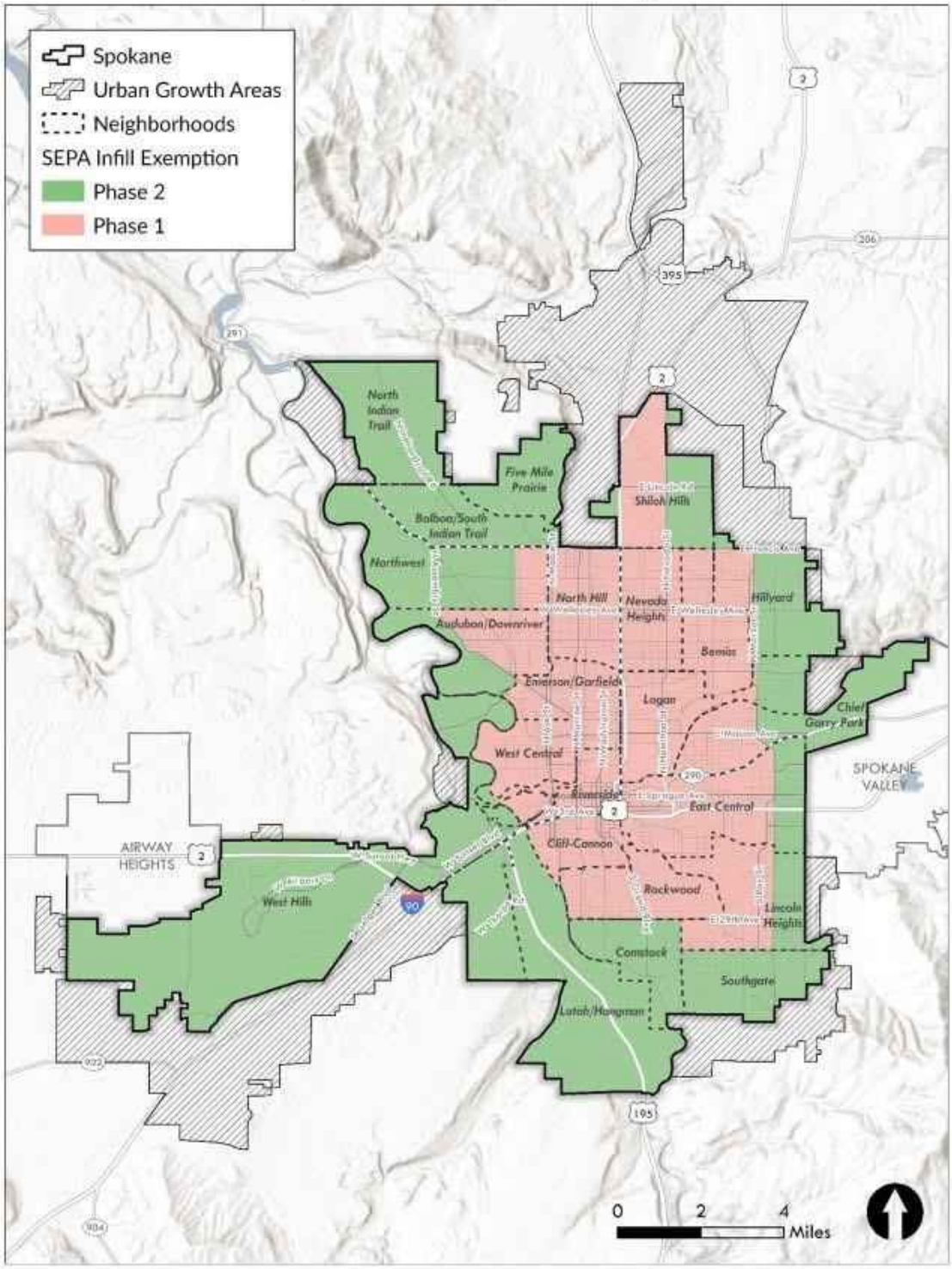
3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 (See photo) shows all neighborhoods will be exempted from environmental review in two phases. C

4. Suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3 (See photo). Existing Hard (Impervious) Surfaces included below.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

A smile is contagious! -Elisabeth

Exhibit 7: Phased SEPA Proposed Infill /Categorical Exemption Area



Source: City of Spokane, BERK, 2025.

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

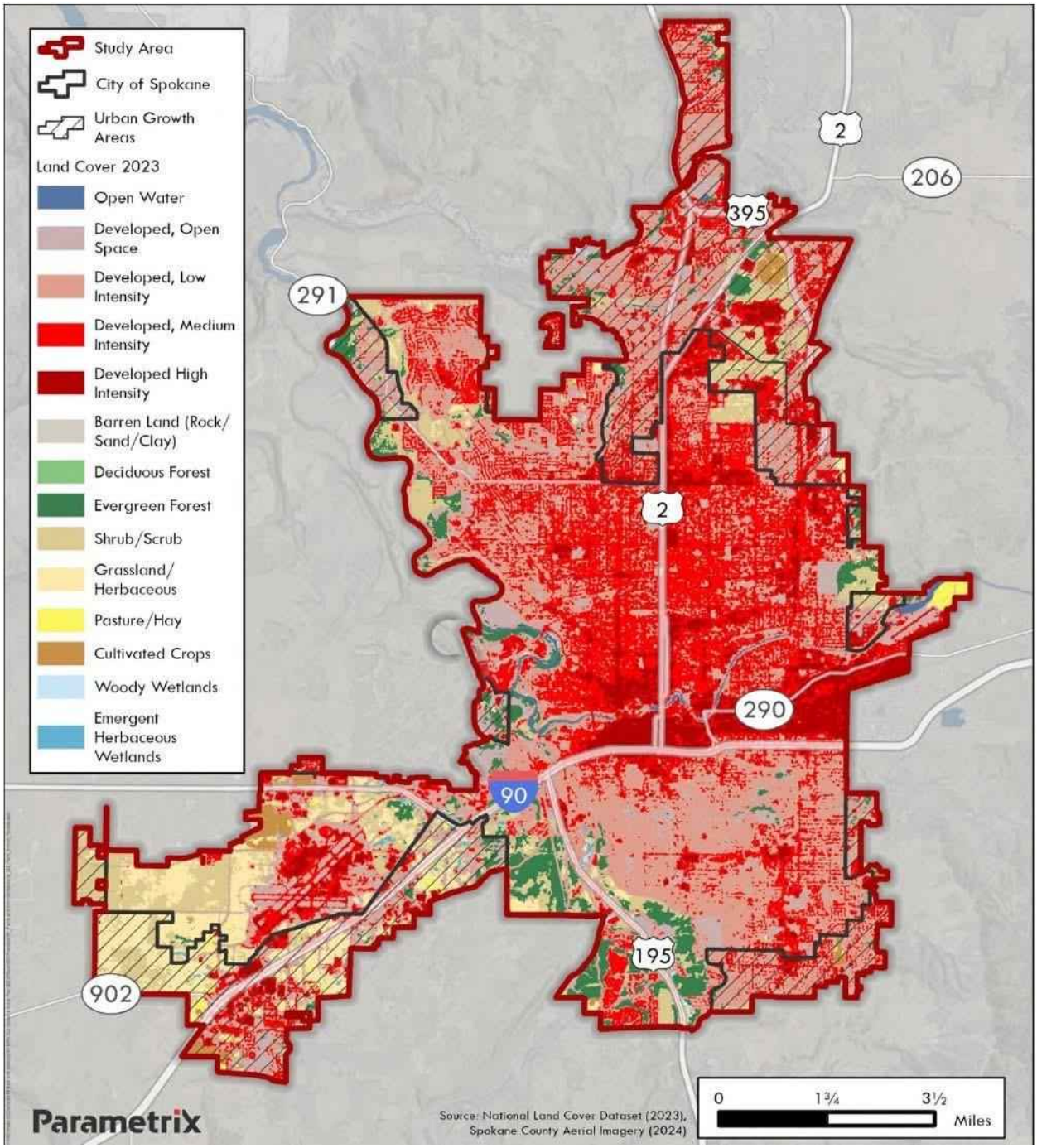
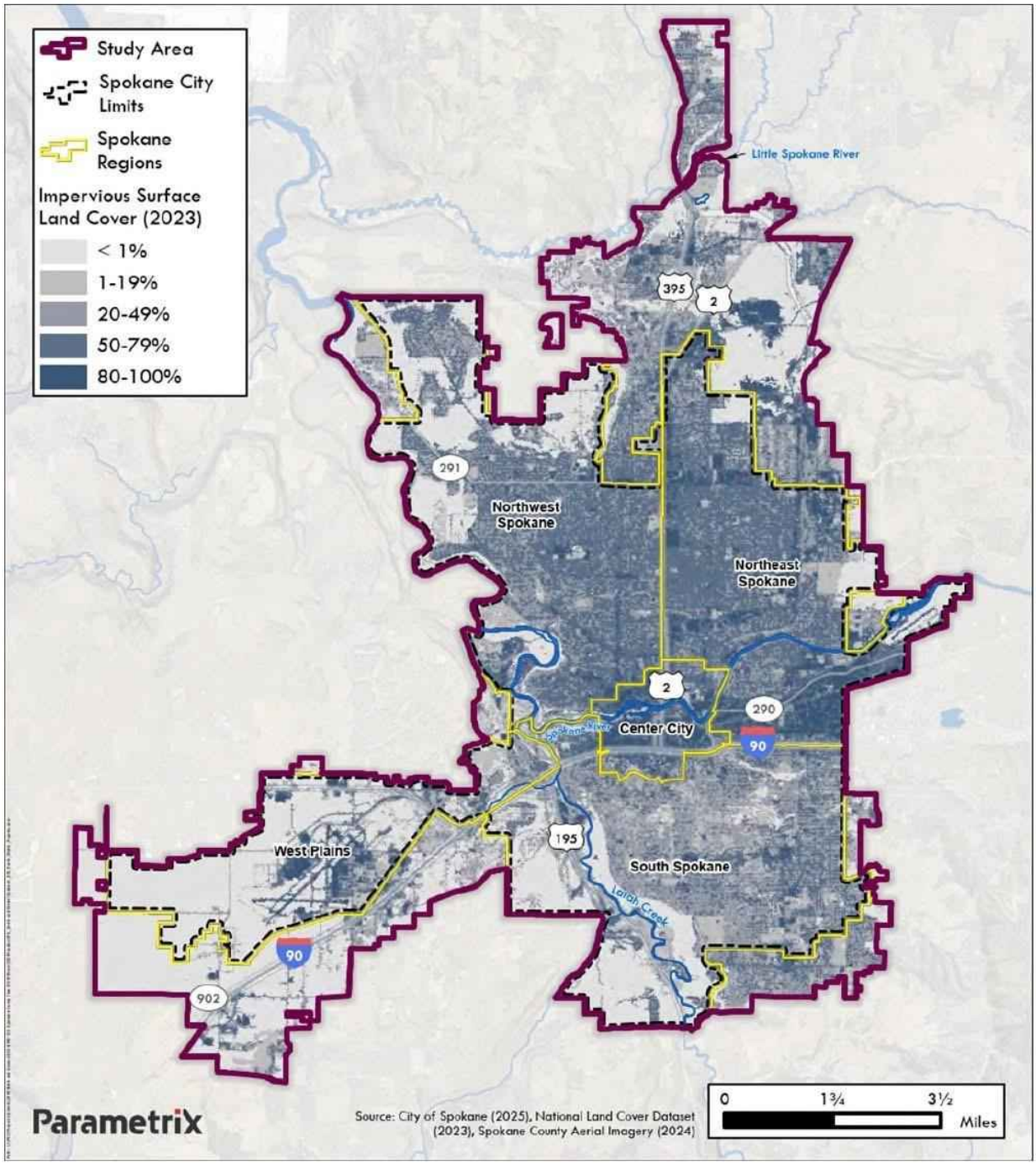


Exhibit 3.1-3. Existing Hard (Impervious) Surfaces



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

From: Kimberly Smiskin
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 4:07:35 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Kimberly Smiskin
Wandermere Stone Horse Properties Neighborhood

A warm smile is the universal language of kindness. -William Arthur Ward

From: Logan Smith
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 12:14:26 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is birth right! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Logan Smith
West Hills, Spokane

From: North Snow
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, February 19, 2026 8:40:52 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

This new plan directly impacts the lives of our community members. Our world needs healing and care not more pain. We need more trees and more green in our neighborhoods, for the health of us AND our planet. Please do not pass any new bill that will directly harm our environment, we do not need this. We need help

A

From: Jordan Soderquist
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 4:00:27 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello,

My name is Jordan Soderquist, a born and raised Spokanite, who returned to our beautiful city and purchased a home in the Audubon/Downriver neighborhood after moving away for 11 years. One of the biggest reasons Spokane is such a desirable place to live is our abundant access to the outdoors. It is critically important that all future city planning protects this access and considers the environmental impacts of all city development. In a time of accelerating climate change, I am deeply concerned with the dismissal of this climate consideration. Please see my comments and demands below:

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, and wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support for an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City. B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. C

4. Support environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

Thank you,

Jordan

From: W Thomas Soeldner
To: Plan Spokane
Subject: PlanSpokane 2046 Draft Environmental Impact Statement (EIS)
Date: Monday, February 16, 2026 12:00:11 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Thank you for this opportunity to comment on the PlanSpokane 2046 EIS. If we believe the Spokane motto, "Near Nature, Near Perfect," there are certain aspects of the EIS that are essential, in some cases, to be included and in some to be excluded.

1. There should be an accurate and up-to-date inventory of the city's tree canopy and natural lands, i.e., lands without human-built structures or improvements. That will require adequate codes, and especially a critical areas code which is enforceable. A,B

2. The blanket Environmental Review exemption should not be used. The city's Plan would exempt all city neighborhoods in two phases. While promoting infill is important, infill should not be used without the scrutiny of environmental review. An Environmental Review exemption should only be granted if 100% of an area is disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3, i.e., for "existing hard (impervious) surfaces. C

3. I strongly support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4. D

Keep Spokane "near nature, near perfect."

Sincerely,

W. Thomas Soeldner

From: Jessica Spurr
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 25, 2026 10:29:12 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing regarding the proposed development plans and environmental review exemptions currently under consideration. I am DEVASTATED that the council would consider allowing this to be passed, excluding neighborhood councils and allowing for the concerns of developers to be put over residents.

Our city's slogan is "Near Nature, Near Perfect," this policy suggests a stark contrast from our slogan. Perhaps 'Was Nature, Now Developed" is the theme of this new policy?

The policy also makes it so that no one of low-income, or hardly anyone of low-income will benefit. As the developers interests are aligned with building homes for higher income individuals. So now we are going to out price residents and gentrify our whole city? What a terrible idea. A

To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. B

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. C

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. D

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. E

If we choose to develop without transparency, or thorough environmental review, we was creating damage that cannot be undone. Nature is not creating new parks. Nature is not D

creating new wildlife habitat; it is up to the residents of Spokane to create that, to protect that.

Please recall our slogan, think of our beautiful city and the children who will enjoy the canopy in the future. Consider the animals, the trees and why the South Hill is to beautiful. It is because of all the Nature.

Regards
Jessica Spurr
Glenrose, 99223

~Jessica~

"Be the change you wish to see in the world"
~Gandhi~

From: DEBBIE STEMPF
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 4:00:09 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits. A

Thank you,

Debbie Stempf
4111 E Prairie Lane Ct
Spokane, WA 99223
5097954910

From: Mark Stenersen
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 2:26:52 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Tirrell Black,

I am writing as a long-time resident of Spokane to express my opposition to Options 2 and 3 in the PlanSpokane 2046 Draft Environmental Impact Statement. A

My concerns are as follows:

1. **Environmental review must be preserved**. Spokane has adopted environmental goals, including a 30% tree canopy target by 2030. The review process must remain meaningful and enforceable so decisions are evaluated against those commitments. B

2. **Affordability requires more than volume**. It requires matching what gets built to who lives here and what people can actually pay. A large share of Spokane's public elementary schools qualify for federal free and reduced lunch programs, which is a strong signal that many local families are low-income. Any plan claiming to address affordability should prioritize housing that is affordable to low-income households. The city's own planning documents indicate that the greatest housing need through 2046 is among lower-income residents. This plan should be evaluated against that need. C

3. **Infill on 20-foot lots with 3-foot setbacks leaves** little room for mature trees or meaningful green space. Trees reduce heat, improve air quality, and make our neighborhoods livable. These options would incentivize tree removal to maximize developable area. D

4. **Retail in residential neighborhoods is a major community change.** If the city wants to pursue this, it should be backed by meaningful, verified community input. E

For these reasons, I urge the city to reject Options 2 and 3 and instead adopt measures that protect neighborhood livability, preserve tree canopy and green space, and meet documented affordability needs. A

Thank you for considering my comments.

Sincerely,

Mark Stenersen
Rockwood Neighborhood, Spokane, WA

From: Mary Stohr
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Monday, January 12, 2026 5:22:27 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

DearTirrell Black, Assistant Planning Director,
Please DO NOT support versions 2 and 3 of the proposed plan as they favor development, the destruction of tree habitat and will not, as far as I can tell, increase affordable housing. I support option 1 which is continue with our current plan and growth and in the process: 1. Protect trees and natural habitat; 2. Protect Neighborhoods from unwanted retail and restaurants in the middle of them which will ruin them and create unsafe and a lack of unity of the neighborhood; 3. Support and build truly affordable housing NOT unaffordable houses and apartments.
Thank you for your consideration of this email.
Best to you,
Mary K. Stohr

A

Submittal of comments by email to **PlanSpokane@spokanecity.org** is preferred. **Please include in the subject line "PlanSpokane 2046 Draft EIS Comments"**.
All written comments should be directed to:
Tirrell Black, Assistant Planning Director
City of Spokane
808 W Spokane Falls Blvd.
Spokane, WA 99201
Questions and comments can be sent to **PlanSpokane@spokanecity.org** or you can call the Planning Department at (509) 625-6185.

From: Anna Stowe
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 1:46:10 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Subject: PlanSpokane 2046 Draft EIS Comments

Firstly, Hello from Australia.

Even though I live here does not mean that I do not care about Spokane. As a Coug alumni and my sister who lives in the city, I visit regularly and am concerned about the potential elimination of the Environmental Review of developments. A

It is so RARE to have a river as beautiful with little development and numerous walking areas.
If anything you should be looking at creating more Nature, not less.
ReDevelopment areas that have already been there and need help.
Do NOT take away the natural areas.

I support the Tree and Natural Land Inventory. All trees in my opinion should be protected but absolutely any tree over 30 years. B
All natural lands throughout the city should be protected. And this is visible when you have Moose arriving in neighbourhoods. They have been displaced.

Basically, I hope that David Attenbourough and Jane Goodall are in your brains when you make decisions.

--
Kind Regards
Anna

From: Lorraine Sumner
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 7:40:40 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration.

Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.

To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

1. Comprehensive Inventory for Informed Policy:
Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

2. Enforceable Critical Areas Ordinance:
Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

3. Opposition to Blanket Environmental Review Exemptions:

I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

4. Targeted Exemptions Only
Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

5. Commitment to Climate Resilience:
I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D,C

If we continue to develop without transparency or rigorous environmental review and protection, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is our birth rite!

I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening,

our environmental protections.

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!

Sincerely,
Hailey “Lorraine” Sumner
The garland district
Spokane, WA 99205

From: Kaiulani Swan
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 1:55:55 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Tirrell Black, Assistant Planning Director,

I've never sent a public comment to the city, however I felt compelled to when reviewing the draft EIS. Spokane has done so many things right--the downtown area when I was young was struggling and now it's full of life, the Riverfront Park upgrades making it even better. We have opportunities as a community to build, develop, and move forward in a better way.

I ask that you protect our tree and natural land inventory--natural areas and wildlife habitat should be inventoried and protected. I strongly oppose the blanket environmental review exemption. Why would we not take these areas into consideration? Why? The best parts of Spokane are the wild areas--the hiking trails, the river, the wildlife areas, the trees. These need to be reviewed and protected. A B

The Climate Resilience and Sustainability Board's recommended Policy Land Use and Zoning 2-4 should be heeded to ensure the Spokane area supports the areas that make this city so unique--our urban forests, shorelines, habitats, and natural systems that provide shade from heat, flood protection, and carbon sequestration. C

Thank you for your time,

Warmly,
Kaiulani Swan

From: Liam Taylor
To: Plan Spokane
Subject: PlanSpokane 2056 Draft EIS Comments
Date: Thursday, March 5, 2026 1:34:07 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello! Sorry to double email you - I just submitted comments from this email, but when I did so, I noticed when I viewed the email, there's just 3 little dots that you have to click to make the comments show up. So, pardon me for the technological mishap! Please see my comments below:

First, I'd like to thank you for what you do at the city. You have an often thankless and controversial job. Keep your head up.

Secondly, I would have liked to see more ambitious alternatives. I initially liked Alternative 2 because its title, "Distributed and Balanced," seemed to match what I was looking for. However, after seeing the map, I realized it's mostly just increasing growth along the main corridors, with only a light touch to the South Hill. I encourage you to expand outside the corridors and not be afraid to develop more on South Hill. Every planner and neighbor I've spoken with wants a coffee shop or bakery in their neighborhood. Build up everywhere, as the title suggests. A

I think it would be helpful (to me) if I simply provided you with some suggestions that I truly hope you take to heart:

1. **Remove arbitrary development standards, including FAR, building setbacks, building/massing articulation, aesthetic regulations, height limits, etc.** B
    - The only exceptions would be lot size and density. But I would make the minimum lot size very small: 1,400 square feet, which is a 20x70 foot lot. Density (du/ac) should be massively increased everywhere so that smaller homes, lots, and apartment buildings can be built in every neighborhood.
2. **Make all neighborhoods mixed-use.** C
    - Like I said, everyone wants a coffee shop in their neighborhood. But there's no reason an optometrist, a winery, or an office building can't be in a normal neighborhood.
    - Limit things like drive-thrus, industrial uses, etc.
    - This would distribute traffic throughout the neighborhood, freeing up the corridors.
3. **Prioritize road safety.** D
    - Redesign your street standards so that intersections have LARGE bulb-outs that 1. increase pedestrian safety, and 2. increase sight-triangle visibility.
    - Create medians in the road near bus stops so cars cannot pass buses when they pull over to a stop. The bus creates a blind corner, where impatient drivers risk hitting someone who steps out of the bus or someone taking a left turn. This is more of a visual problem - let me know if you'd like a sketch.
    - Prioritize roundabouts. They're cheaper to maintain than street lights, reduce carbon pollution by minimizing traffic flow, and are just so much safer.
4. **Annex and expand UGA.** E
    - I know, I know - this is a Commerce problem. While they've gotten a lot

better by legalizing middle housing, they're still capping growth way too much, in my opinion. E

5. **Exempt all non-industrial projects from SEPA through this EIS and comp plan.** F
    - Yes, I'm serious. SEPA was created with the best intentions, but it is now just a tool for NIMBYs to stop housing developments. It's a waste of time and money. And it doesn't even protect the environment!
6. **Massively simplify your comp plan elements, particularly the Goals and Policies.** G
    - I truly believe that planning needs a dramatic change from how comp plans are written. We need to remove all immeasurable goals, policies, and fluffy language. We're here to run a city, not write poetry.
    - For example, your *only* goal for the Housing Element should be *"Build 22,359 homes in the next 20 years,"* followed by the strategy *"upzone everywhere."*
    - I briefly skimmed some of the draft chapters. Most of it can be deleted. For example, Goal N-1: *Recognize downtown Spokane as the primary economic and cultural center of the region and improve its viability as a desirable neighborhood in which to live, visit, and conduct business.* What? How do we measure that? Remove it, and so many others.
    - Once, I saw a goal in a different city that just said *"support artists,"* and when my eyes rolled, it sounded like concrete scraping against itself.
7. **Do not prioritize historical preservation.** H
    - Many old homes are ugly, rundown, and unsafe. They should not be protected because they're older than 45 years. When a tree dies, you cut it down and plant more trees. Why should homes be any different?
    - It stunts growth, development, and property rights. I don't care if my neighbor likes my house because it's old - it's my house! My property! I should be able to tear it down or remodel it!
8. **Never bow to the NIMBYs.** I
    - Simple as.
9. **Reduce public input, comments, hearings, appeals, etc.** J
    - If you didn't already think I'm insane, you probably do now.
    - But for real, if a project meets the zoning standards, it should proceed directly to a building permit and construction. No public input, no neighborhood meetings, no appeal - nothing! Do not let the bottom 0.01% of the city (NIMBYs) control us.

I sincerely hope you've read all of this and haven't decided blacklisted me ;-)

I also want to thank you for extending the comment period to today, so I could spend my lunch break ranting about planning. Although I would like to see a dramatic change, I believe you're all doing a great job of fostering growth in this city. Please do not hesitate to contact me if you have any questions or comments.

Very, truly, sincerely,

Liam J. Taylor, AICP
509-218-9852

From: Liam Taylor
To: Plan Spokane
Subject: PlanSpokane 2056 Draft EIS Comments
Date: Thursday, March 5, 2026 1:24:20 PM
Attachments: 2026-0305-PlanSpokaneComment-LJT.pdf

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello!

First, I'd like to thank you for what you do at the city. You have an often thankless and controversial job. Keep your head up.

Secondly, I would have liked to see more ambitious alternatives. I initially liked Alternative 2 because its title, "Distributed and Balanced," seemed to match what I was looking for. However, after seeing the map, I realized it's mostly just increasing growth along the main corridors, with only a light touch to the South Hill. I encourage you to expand outside the corridors and not be afraid to develop more on South Hill. Every planner and neighbor I've spoken with wants a coffee shop or bakery in their neighborhood. Build up everywhere, as the title suggests.

I think it would be helpful (to me) if I simply provided you with some suggestions that I truly hope you take to heart:

1. **Remove arbitrary development standards, including FAR, building setbacks, building/massing articulation, aesthetic regulations, height limits, etc.**
    - The only exceptions would be lot size and density. But I would make the minimum lot size very small: 1,400 square feet, which is a 20x70 foot lot. Density (du/ac) should be massively increased everywhere so that smaller homes, lots, and apartment buildings can be built in every neighborhood.
2. **Make all neighborhoods mixed-use.**
    - Like I said, everyone wants a coffee shop in their neighborhood. But there's no reason an optometrist, a winery, or an office building can't be in a normal neighborhood.
    - Limit things like drive-thrus, industrial uses, etc.
    - This would distribute traffic throughout the neighborhood, freeing up the corridors.
3. **Prioritize road safety.**
    - Redesign your street standards so that intersections have LARGE bulb-outs that 1. increase pedestrian safety, and 2. increase sight-triangle visibility.
    - Create medians in the road near bus stops so cars cannot pass buses when they pull over to a stop. The bus creates a blind corner, where impatient drivers risk hitting someone who steps out of the bus or someone taking a left turn. This is more of a visual problem - let me know if you'd like a sketch.
    - Prioritize roundabouts. They're cheaper to maintain than street lights, reduce carbon pollution by minimizing traffic flow, and are just so much safer.
4. **Annex and expand UGA.**
    - I know, I know - this is a Commerce problem. While they've gotten a lot better by legalizing middle housing, they're still capping growth way too much, in my opinion.

5. **Exempt all non-industrial projects from SEPA through this EIS and comp plan.**
    - Yes, I'm serious. SEPA was created with the best intentions, but it is now just a tool for NIMBYs to stop housing developments. It's a waste of time and money. And it doesn't even protect the environment!
6. **Massively simplify your comp plan elements, particularly the Goals and Policies.**
    - I truly believe that planning needs a dramatic change from how comp plans are written. We need to remove all immeasurable goals, policies, and fluffy language. We're here to run a city, not write poetry.
    - For example, your *only* goal for the Housing Element should be *"Build 22,359 homes in the next 20 years,"* followed by the strategy *"upzone everywhere."*
    - I briefly skimmed some of the draft chapters. Most of it can be deleted. For example, Goal N-1: *Recognize downtown Spokane as the primary economic and cultural center of the region and improve its viability as a desirable neighborhood in which to live, visit, and conduct business.* What? How do we measure that? Remove it, and so many others.
    - Once, I saw a goal in a different city that just said *"support artists,"* and when my eyes rolled, it sounded like concrete scraping against itself.
7. **Do not prioritize historical preservation.**
    - Many old homes are ugly, rundown, and unsafe. They should not be protected because they're older than 45 years. When a tree dies, you cut it down and plant more trees. Why should homes be any different?
    - It stunts growth, development, and property rights. I don't care if my neighbor likes my house because it's old - it's my house! My property! I should be able to tear it down or remodel it!
8. **Never bow to the NIMBYs.**
    - Simple as.
9. **Reduce public input, comments, hearings, appeals, etc.**
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Very, truly, sincerely,



Liam J. Taylor, AICP
509-218-9852

From: Todd Taylor
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 5:01:10 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

To whom it concerns,

I am concerned with the recent update that would impact the longevity of Spokane 's natural spaces. While I appreciate a focus on increasing housing I fear the approach will have a negative impact on core parts of what makes Spokane great. Below are concerns that I agree with.

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 below. B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 below shows all neighborhoods will be exempted from environmental review in two phases. C

4. Support environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces included below. C

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships. D

Best,

Todd.

From: Shawn Terjeson
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 3:07:32 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

With complete gratitude to everyone working on Plan Spokane, I have some comments on the EIS.

In the Draft Environmental Impact Statement (EIS) - Summary, three Proposed Alternatives. I support Alternative 2. A

For the remainder of my comments, I will be referring to the Draft Environmental Impact Statement (EIS) - Full

Climate Refugees
On the subject of Climate Refugees, the draft EIS states in two locations, "Growth numbers should consider possibility of climate refugees" B

In a recent article about Project Censored, the Spokane Inlander reviewed news stories that do not get covered by the mainstream press.

https://www.inlander.com/news/at-a-moment-when-accountability-and-truth-are-paramount-project-censored-s-list-of-buried/article_16dcfe55-0bf3-462c-8ac7-486dd6db6c4c.html

The second story has the headline "Water Scarcity Threatens 27 Million People in the U.S."

In the last ten years there have been climate refugee stories from around the world. As part of resilience planning, I suggest that we change that sentence to, "**Growth numbers will consider the possibility of climate refugees**"

Transit
Are we giving up on increased use of transit? Yes, to use a popular analogy, people will probably give up their guns before they give up their cars. But, as a relative newcomer to the city, I am impressed with our STA. I'm also fortunate because I live three blocks from a transit station. We are just scratching the surface of what transit can do to positively transform a region. Yes, it is damn expensive. I guess we'll have to buck up. C

Affordable Housing
I have no idea how we can incentivise the building of affordable housing. Removing regulation on new construction seems to result in more of our already surplus not so affordable housing. In the EIS I would like to see a plan or a plan for a plan for a higher percentage of affordable housing being built. D

Personally, I am tired of watching developers apply their ideas of what a city should look and feel like. Please don't drop the regulatory ball for the next 20 years. E

Neighborhood Councils
The draft EIS does not mention the role of Neighborhood Councils or the Community Assembly. As an individual in the city, I feel tiny. As part of a Neighborhood Council, I feel a little less tiny. Let's face it, the next 20+ years are going to be ugly. Neighborhood Councils are the thin wall between citizens ranting at the city council or cooperatively working for solutions. F

Thank you all very much,

Shawn Terjeson
2607 E 35th Ave.
Spokane, WA 99223
ShawnInMotion@gmail.com

206-935-2646

From: Carol Tomsic
To: Plan Spokane
Cc: Black, Tirrell; Wilkerson, Betsy; Dillon, Paul; Telis, Kate; Hamlin, Heather; Marilyn
Subject: Comment on PlanSpokane 2026 Draft Environmental Impact Statement
Date: Tuesday, February 10, 2026 8:30:09 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Earth, Water Quality, Water Resources

Add permeable pavers to an allowable alternate to asphalt and concrete sidewalks and roads. It will help mitigate stormwater and protect our aquifer. A

Air Quality, Greenhouse Gases.

Add more incentives for transit and bicycle usage in housing.

The city should partner with STA in offering bus passes at reduced rates to residents who live or work near an STA Park and Ride, or on a high performance transit line, to increase transit use and reduce car exhaust. B

Plants and Animals

Add more codes that limit clearing and soil disturbance, especially on private land adjacent to open space and city parks. C

Land Use Patterns and Urban Form

Center and Corridor codes should limit office/commercial sprawl into established residential neighborhoods. Historic residential boundaries should be protected in neighborhoods with Center and Corridors. D

Empty lots should be developed in center and corridors prior to expanding center and corridors boundaries.

Population, Employment and Housing

It is important to remember that homeowners should be protected too. The city has increased property taxes and utility taxes. Property insurance has risen dramatically due to extreme weather events and catastrophes. Unexpected and unaffordable repairs can also put homeowners in jeopardy of homelessness. E

Relationship to Plans, Policy and Regulation

Neighborhood Councils advocate for their neighborhoods and residents. They need to be cited in the document at every opportunity. A lot more than presently. F

Transportation

The current Transportation Impact Program needs to be updated. Developments that have an affect on traffic/pedestrians should have traffic calming funded during construction. G

Add an increase the allocation for the Spokane Safe Streets for All traffic calming program as a potential measure.

Public Services

H

I think it's important for the city to continue to partner with the parks and schools. It needs to be added to the document at every opportunity.

Utilities

I

Water conversation is very important. I greatly appreciate clean water and usable rivers. I'd also like to stress that raising utility fees affects homeowners discretionary income. Please continue to explore other options.

Thank you.

Carol Tomsic
resident

From: Konrad VanDeest
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 12:21:36 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.
To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:
Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A
Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city, we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B
I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods. Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious. Protecting the remaining soft surfaces is vital for drainage and heat reduction. C
Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D
If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water. I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C
I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,

Konrad VanDeest
1117 w. Alice ave. Spokane WA 99204

From: Stefani VanDeest
To: Mayor; Plan Spokane
Subject: Plan Spokane 2046 draft eis!
Date: Tuesday, February 17, 2026 11:58:41 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
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Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands.
Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk.
Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.
Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection.
If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections.
I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
[konrad vandeest]
1117 w Alice Ave, Spokane, WA 99205

From: Stefani VanDeest
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Tuesday, February 17, 2026 11:35:20 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,
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Sincerely,
Stefani VanDeest
Emerson/Garfield

From: Lisa VanMansum
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Monday, February 9, 2026 9:11:00 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

My initial comment is that the timeline needs to be more aggressive. 20 years is too far out to be effective with things that are clearly an issue today. A

Spokane has always been slow to plan and has lacked effective follow-through with plans from the Connections and Corridors that I was involved in.

Spokane is slow to adopt effective public transit, connected bike lanes, maintenance of the parks and valuable green spaces, and time and time again, we let the developer dictate the outcome.

One thing that is a major issue that needs to be addressed today and made permanent is that we need more trees planted in any and all developments. I live just outside the city boundary in Spokane County. I had no idea that our community has not implemented mandates for trees and preservation of green spaces as municipalities like Seattle and Redmond, WA have. My development has no requirement to have trees planted. And while we would like to do that now, it is very cost-prohibitive. It is almost $1,000 per tree - cost of tree, soil prep, planting, irrigation, and border. However, it could have been done for far less during the development phase. Further, we are not in an economically challenged area so there is no fundign for this retro improvement to our neighborhood and community. Please make this change sooner than 20 years from now and implement this in the County as well. B

Thank you for taking my comments.
Lisa VanMansum
509-263-8345

From: darcy.varona@gmail.com
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 8:53:15 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I strongly prefer Alternative 3 as the City's selected growth alternative. This support is conditioned on the EIS adequately evaluating cumulative environmental impacts at the comprehensive plan level and ensuring that those impacts are avoided or mitigated through adopted development regulations, consistent with SEPA. A,B

Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits A

Please establish clear guardrails before broadly applying SEPA infill and housing exemptions, including completing an inventory of existing urban natural assets - such as tree canopy, habitat value, and ecological connectivity to ensure that infill development doesn't result in unmitigated impacts to environmental resources in urban neighborhoods. C,D

I am opposed to the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. I support environmental review exemption only if the proposed development area is 100% disturbed and impervious as identified in the draft EIS Exhibit 3.1-3. E

Thank you,

Darcy Varona

1738 W 12th Ave

Spokane, WA 99204

From: Justin Vaughan
To: Plan Spokane
Subject: PlanSpokane 2056 Draft EIS Comments
Date: Friday, March 6, 2026 10:06:14 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I know this email will be thrown out, but I must voice my opinion.

Clean air and clean water is what we should be focused on environmentally. Any projects that will cost taxpayers an excessive amount, that will stifle existing resources (or inflate the cost of) are not desired and would be irresponsible to deploy. A

Many companies are leaving Washington State due to the unpredictability of tax rates and regulations. I fear Spokane is doing the same. I was born here, grew up here, and chose to raise my family here. I love this city and hate to see it trying it's darndest to become Seattle Jr. I am very close to convincing my wife to move our business 30 minutes east, to avoid this ridiculousness and I am not alone in this. B

Yes, we should strive to take care of our environment. However, anything beyond clean air and clean water is only an opportunity for creating artificial price hikes in our existing resources, and -- unfortunately -- an opportunity for fraud. If you don't believe this, look at Seattle, LA, Portland, Austin, Minneapolis, San Francisco, etc. I travel across the country for work, and this is common knowledge for people outside the bubble of alarmists. C

Thanks for listening to my opinion; though, we both know it will be ignored.
J. Vaughan

From: Meg Verm
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Thursday, March 5, 2026 10:23:59 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

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If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, provide needed wildlife habitat and corridors, and protect clean air and water for all residents in Spokane. C

I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections.
I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,

Megan Vermilion
99204
Cliff-Cannon

From: Lisa Waddle
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 7:40:11 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

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Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!
Sincerely,
Lisa Waddle
3211 W Cora Ave
Audubon/Downriver neighborhood

Sent from my iPhone

From: John Wallingford
To: Plan Spokane
Cc: Mary Stohr
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 8:57:14 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

18 Feb, 2026

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

Re: PlanSpokane 2046 Draft EIS Comments.

Mr Black,
The draft EIS is focused on housing and jobs. Consideration is given to how the three alternatives impact, and what mitigations are possible regarding those impacts, on 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, and Utilities.
Section 1.3 defines key issues and options.

My comment is limited to impact and mitigations of impacts on Air Quality/Greenhouse Gases; Plants and Animals; Land Use Patterns and Urban Form. In particular, I write to emphasize protection of the tree canopy in Spokane because it is implicated in the named key issues. A

The vision statement names environmental stewardship. Among many other things, Environmental stewardship includes protection of the tree canopy, recognized in the city commitment to SpoCanopy goals.

Each of the other key issues named directly or indirectly affects the canopy. B

- 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.

There are examples throughout the city where new housing is constructed on land

cleared of trees. This need not be accepted. Inexpensive housing in an environmentally compromised area serves to institutionalize economic disparity. B

➢ Approval of a comprehensive plan that provides land use and transportation strategies to reduce greenhouse gas emissions. C

One of the key mitigation tactics to reduce GHG is planting of trees. Mature trees capture greatly more CO2 than young trees. Yes, after decades young trees will mature and capture more CO2, but we can ill afford to wait for decades. Mature trees must be retained during development.

➢ Approval of a comprehensive plan that increases resilience to climate-related hazards, reduces exposure to pollution, and addresses environmental impacts.

A tree canopy is high on the list of variables that provide resilience to climate-related hazards, most particularly high heat index in lower income neighborhoods as previously documented by Gonzaga. Consideration must be given to fire risk and damage from insects and storms; but those factors can be included in the review of housing development plans.

➢ Approval of development regulations that implement the Comprehensive Plan goals, policies, and land use plan. D

Goal ECOS 1 of the Climate resiliency and sustainability plan, specifically policy ECOS 1-1, calls to “Establish and support programs, codes, and standards that support the long-term health and maintenance of the urban canopy on public and private lands…” The mechanism to protect mature trees is proper permitting, wherein professional arborists can contribute to proposed development by designating the maximum, reasonable retention of mature trees.

I encourage you to elevate those mitigations that protect and improve the tree canopy in Spokane from just among the possible mitigations to recommended mitigations. For example E
“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: and “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…: p I-21-22. (italics added)

E

And on p I-24,
“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…”

While it may be true that “There are no significant, unavoidable adverse impacts expected for land use, urban form, and environmental justice” in the alternatives, there are significant *avoidable* adverse impacts. Attention to tree canopy is a readily available metric to minimize adverse impacts, avoidable and unavoidable.

John Wallingford
2424 S Manito Blvd Spokane, WA 99203

From: melissa ward
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS
Date: Wednesday, February 18, 2026 10:03:56 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear City Planning Committee,

I am writing to you today as a concerned resident regarding the proposed development plans and environmental review exemptions currently under consideration. Our city's slogan is "Near Nature, Near Perfect," yet the current trajectory of these policies suggests a move away from the very natural beauty that defines our community's identity.

To ensure Spokane remains "Near nature, near Perfect," I am asking the Committee to address the following five critical areas:

Comprehensive Inventory for Informed Policy: Spokane has an ambitious 30% tree canopy goal, yet we lack the adequate codes to reach it. We must prioritize a full inventory of our trees, wildlife habitats, and natural lands. Per the Growth Management Act, we have a duty to protect these critical areas, and we cannot manage what we have not measured. A

Enforceable Critical Areas Ordinance: Our current protections are insufficient. As evidenced by the unprotected natural lands throughout the city (ref: Exhibit 3.3-3), we require an enforceable ordinance that specifically protects our water quality, habitat, and existing tree stands. B

Opposition to Blanket Environmental Review Exemptions: I strongly oppose the proposed two-phase blanket exemption from environmental reviews for Spokane neighborhoods (ref: Exhibit 7). Removing oversight for wetlands, forests, and riparian areas puts our local ecosystems at significant risk. C

Targeted Exemptions Only: Environmental review exemptions should be reserved strictly for sites that are already 100% disturbed and impervious, as identified in the Draft EIS Exhibit 3.1-3. Protecting the remaining soft surfaces is vital for drainage and heat reduction.

Commitment to Climate Resilience: I fully support the Climate Resilience and Sustainability Board's recommended Policy LU 2-4. We must treat our urban forests and open spaces as interconnected natural systems that provide essential carbon sequestration and flood protection. D

If we continue to develop without transparency or rigorous environmental review, we risk losing natural areas that enrich the human spirit, wildlife habitat, clean air and water, which is impur birth rite! I urge you to uphold the spirit of our city's slogan by strengthening, rather than weakening, our environmental protections. C

I look forward to your response and to seeing these protections reflected in the upcoming plans for our city!

Sincerely,

Melissa Ward
Minnehaha
2304 N Upriver Ct, Spokane, WA 99217

From: Leah Welki
To: Plan Spokane
Subject: Protect Natural Lands - DRAFT EIS
Date: Wednesday, February 18, 2026 8:56:30 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Good morning. I am writing today to submit a comment on the drafted EIS for the City's PlanSpokane 2046.

I strongly prefer Alternative 3 as the City's selected growth alternative. This support is conditioned on the EIS adequately evaluating cumulative environmental impacts at the comprehensive plan level and ensuring that those impacts are avoided or mitigated through adopted development regulations, consistent with SEPA. A B

Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits A

The City is considering expanded use of SEPA infill and housing exemptions. Given this approach, I urge the City to establish clear guardrails before broadly applying exemptions, including completing an inventory of existing urban natural assets - such as tree canopy, habitat value, and ecological connectivity to ensure that infill development does not result in unmitigated impacts to environmental resources within urban neighborhoods C D

I know myself and my neighbors oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 in the EIS, shows all neighborhoods will be exempted from environmental review in two phases E

Thank you,

Leah Welki (she/her)
Strategic Communications Manager

Proud B Corp
Cell: 570-814-5163

From: Megan Wiltshire
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Wednesday, February 18, 2026 8:53:05 AM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

To whom it may concern, please consider the following:

1. Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. A

2. Support an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City as shown in Exhibit 3.3-3 (See photo). B

3. Oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 (See photo) shows all neighborhoods will be exempted from environmental review in two phases. C

4. Suport environmental review exemption only if 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3 (See photo). Existing Hard (Impervious) Surfaces included below.

5. Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] Thank you, Megan Wiltshire D

From: Patti Worley
To: Plan Spokane
Subject: EIS statements
Date: Tuesday, February 17, 2026 9:33:00 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

I cannot find info re EIS studies but I was told one issue being considered was not requiring EIS statements for new developments in the city.
I am concerned that this might be adopted. I understand that an EIS study might be prohibitively expensive for a small project, but I believe it to be necessary for any large development. Living in Spokane is wonderful because of residences' proximity to nature. Even if we support increasing the density within the city limits, we must be careful not to destroy one of our city's most attractive features.
New developments should be located, as much as possible, on ground that is already paved or cleared or where older buildings are torn down.
I don't want Spokane to turn into a Los Angeles.
Patty Worley.

A

Sent from my iPhone

From: steven yach
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comment
Date: Sunday, December 21, 2025 4:44:09 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Proposed Housing Development at 2114 W. Falls Avenue, Spokane, WA 99201

Parcel Number 25133.1510
David and Tamala Tucker; Parcel Owners

We are Leslie Gail Yach and Steven Yach, residing at 2129 W. Falls Avenue, Spokane, WA 99201. Leslie has been a resident at this address in the “Lower Crossing” neighborhood since 1975. The paved Spokane City street bordering our property is a seemingly substandard width of 22' for a two lane road, and parking. We care for Leslie's Severely Handicapped Son (Cerebral Palsy), Sheehan Trueman, living at our house. Sheehan is 46 years old, with a mental ability of under one year. He cannot walk, talk, or communicate, and experiences Grand Mal Seizures several times daily.

We became aware that a residential development proposal at 2114 W. Falls Avenue has been advertised in the Spokesman Review, and is in its' preliminary stage. It proposes Two separate Three story buildings, totaling 10 housing Units with six units on Falls Avenue, just feet from our property. The existing 22' wide street is so narrow that street parking is only allowed on the South side of the road to access residents' properties. Occasionally, vehicles belonging to Spokane residents using the public lands to access the Spokane River for recreation are parked illegally on the North side of Falls Avenue. We are frequently blocked off from entering and exiting our residence. This is a current problem we and our neighbors deal with. Additional vehicles using Falls Avenue for overflow parking created by the additional proposed housing units will undoubtedly exasperate the situation. A

In Addition, the Falls Avenue hill accessing our neighborhood is so steep that in the past Winter months, City Snow Plows, City Garbage and Recycling Trucks, Oil refueling trucks, US Postal and Package Delivery trucks, and even private vehicles have been stuck on the hill for hours and even days, due to iced roadway conditions. This blocks the neighborhoods' ability to access the City street system. These situations will almost certainly be increased by the additional residents of the proposed housing development vehicles.

Because of the increased traffic and parking congestion which will be generated by this Housing Development proposal at 2114 W. Falls Avenue, we are extremely concerned about Emergency and other Service vehicles' abilities to access our residence when the need arises to address life altering events concerning our Son's health. Access for City Police protection may also be negatively affected.

Leslie and I implore you to consider these factors concerning the feasibility of this proposed development on our safety concerns. Access for Emergency Vehicles, City Services, and additional private vehicles will be limited and conceivably negatively affected with the additional traffic and parking caused by this proposal. We urgently request you to take into serious consideration the ability for our Handicapped Sons' access for medical attention, just as any citizen of Spokane City.

We are not opposed to development. We are raising our concern that a less dense residential development, such as Single Family residence, or even a Duplex would not result in the access issues

drastically affecting our safety as described above.

Thank You!

Leslie Gail and Steven Yach

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From: Jimmy Young
To: Plan Spokane
Subject: PlanSpokane 2046 Draft EIS Comments
Date: Tuesday, February 17, 2026 5:31:38 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hi,

My name is Jim, and I hope you will Support Tree and Natural Land Inventory: Spokane has a tree canopy goal of 30% and strong support for natural land protection without adequate codes. An inventory of trees, natural areas, and wildlife habitat is necessary to inform the critical areas code. The Growth Management Act requires protection of critical areas, forests, habitat and natural lands. Support for an enforceable critical areas ordinance is required to protect critical areas, trees, habitat, water quality, etc. There are unprotected natural lands throughout the City. A,B

Please oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. C

Help to support environmental review exemption only if 100% disturbed and impervious.

Support the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 ["Protect, restore, acquire, and maintain urban agricultural lands, urban forests, critical areas, shorelines, habitats, and open spaces as interconnected natural systems that provide flood protection, heat reduction, and carbon sequestration benefits, including through codes, capital investments, and regional partnerships."] D

Thank you,

Jim Young

Spokane WA

From: Jimmy Young
To: Plan Spokane
Subject: Supporting protection of natural lands and wildlife habitat in the draft EIS.
Date: Wednesday, February 18, 2026 3:00:02 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hey!,

Those in the know strongly prefer Alternative 3 as the City's selected growth alternative. This support is conditioned on the EIS adequately evaluating cumulative environmental impacts at the comprehensive plan level and ensuring that those impacts are avoided or mitigated through adopted development regulations, consistent with SEPA. A B

Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits A

The City is considering expanded use of SEPA infill and housing exemptions. Given this approach, 350 Spokane urges the City to establish clear guardrails before broadly applying exemptions, including completing an inventory of existing urban natural assets - such as tree canopy, habitat value, and ecological connectivity C D

To ensure that infill development does not result in unmitigated impacts to environmental resources within urban neighborhoods we oppose the blanket Environmental Review exemption in order to protect critical areas such as wetlands, forests, wildlife habitat and riparian areas in neighborhoods. Exhibit 7 in the EIS, shows all neighborhoods will be exempted from environmental review in two phases E

We Support environmental review exemption only if the proposed development area is 100% disturbed and impervious as identified in the Draft EIS Exhibit 3.1-3. Existing Hard (Impervious) Surfaces.

Please pass this.

Thank you
Jim Young
Spokane WA