

City of Spokane

Comprehensive Plan Periodic Update 2026-2046

Final Environmental Impact Statement

October 2026



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PLANSPOKANE

Resilient | Connected | Livable | 2046

Date: October 26, 2026

Subject: Final Environmental Impact Statement (EIS) for the City of Spokane Comprehensive Plan Periodic Update

Dear Reader:

The City of Spokane is preparing a periodic update to the City's Comprehensive Plan for 20 years, from 2026 to 2046. The City's Comprehensive Plan was last updated in 2017. Through a consultation process between Spokane County and regional cities, the City of Spokane must plan for 22,359 new dwelling units between 2020 and 2046. The City also needs to accommodate employment opportunities for this timeframe. The periodic update and EIS consider how the city will grow over the long-term to 2046.

> *The Spokane community was directly affected by the Spokane Complex fire in August 2026. The City lost approximately 513 dwellings and more than 74 other structures were destroyed in the city limits, with more losses in the surrounding county. There was significant loss of tree canopy as well and numerous effects on the Spokane River and ecological systems within and adjacent to the burn area. The immediate focus of the City is to prioritize emergency response and support rebuilding of homes in affected neighborhoods.*
>
> *The need to rebuild does not increase the City's 2020-2046 growth targets. Rebuilding has begun and the City will meet its long-term obligations to implement the updated Comprehensive Plan and development regulations to manage growth, provide additional housing and economic opportunities, plan for necessary services and infrastructure (e.g., fire protection, streets, stormwater, parks), improve environmental and climate resilience, and more.*

Each chapter of the plan, except for the Shorelines Chapter, will be updated to address new growth targets for population and jobs, and to meet changes to the Growth Management Act (GMA) since 2017 including considerations around Climate Planning and Planning for Housing at all income levels, and incorporate the community's vision for the next 20 years. The Land Use Plan Map has been amended with the periodic update proposals to create more housing and job opportunities and respond to growth targets, community needs, transportation investments, and environmental conditions. Zoning and other development regulations will also be amended to implement the Land Use Plan Map. Critical Area regulations will be evaluated and updated in 2027, and recent state planning rules will be addressed.

The City prepared a **Draft EIS** in December 2025 (comment period December 18, 2025-March 5, 2026) to evaluate different growth patterns and policies. Alternative 1 "Stay the Course" is a required "no action" alternative that would maintain the current comprehensive plan and code. It was developed in prior years with different growth targets and different state expectations. This alternative includes analysis of "middle housing" changes adopted by the city in 2023. Alternative 2 "Distributed & Balanced" adds greater housing and job intensity along frequent transit routes and prioritizes a jobs/housing balance. Alternative 3 "Center City & Regional Hubs" focuses both jobs and housing growth in regional hubs and connections between them, particularly Center City, West Plains, and Hillyard.

The **Final EIS** evaluates a Preferred Alternative reflecting public input and review by the Plan Commission and City Council. It blends features of all EIS alternatives – growth in major hubs like the Center City, mixed use and housing growth along bus rapid transit lines and corridors, and employment growth consistent with regional projections. The Final EIS also responds to comments on the Draft EIS. This Final EIS provides valuable information about the affected environment conditions circa 2025 and notes where those conditions have changed in fire-affected areas.

The EIS focuses on the long-term impacts of the alternatives towards a wide range of topics such as: earth, water quality, and water resources; air quality and greenhouse gas emissions; plants and animals, including critical areas and habitat; land use including historic and cultural resources; housing and economic development; transportation, public services; and utilities.

Key environmental issues and options facing City decision makers include:

- Developing a growth concept and goals and policies that implement the plan's vision and objectives for a vibrant, resilient, and inclusive city.
- Clarifying and simplifying the plan and regulations to facilitate desired growth and protect the environment, including critical areas.
- Ensuring policies and development regulations accommodate housing needs at all income levels and address racially disparate impacts in access to housing.
- Providing land use and transportation strategies to reduce greenhouse gas emissions.
- Approving a comprehensive plan that increases resilience to climate-related hazards, reduces exposure to pollution, and addresses environmental impacts.

Please see the Fact Sheet and project website (my.spokanecity.org/planspokane/) for how to be involved in PlanSpokane 2046. Thank you for your interest in the City of Spokane.

Sincerely,



Spencer Gardner, Director, Planning Services

Fact Sheet

Project Title

City of Spokane Comprehensive Plan Periodic Update known as PlanSpokane 2046

Proposed Action and Alternatives

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

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

The Land Use Plan Map has been amended with the periodic update proposals to create more housing and job opportunities and respond to growth targets, community needs, transportation investments, and environmental conditions. Zoning and other development regulations will also be amended to implement the Land Use Plan Map. Critical area regulations will be evaluated and updated in 2027,and recent state planning rules will be addressed.

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

The City is studying four Alternatives for the Comprehensive Plan:

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

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

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

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

- **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, and provides additional education/health jobs in the city center and University Area. It concentrates new industrial jobs in public development authorities in West Plains and Northeast Spokane.
  - Like Alternative 2, the Preferred Alternative designates mixed use and housing growth along bus rapid transit lines and corridors that have frequent transit. Corridors would have a range of businesses, housing densities, and livability/streetscape improvements. Several corridors improve connections between major hubs like Downtown and other job hubs in West Plains and Hillyard.
  - 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, set for the period 2022-2026, and is in the range of Alternatives 2 and 3.
  - Like Alternatives 2 and 3, the Preferred Alternative simplifies the land use plan so that there are fewer land use designations, which are then implemented by multiple zones. The simplified land use plan reflects the areas of focus for new mixed use and low and mid-rise residential and other land use initiatives.
  - Like Alternatives 2 and 3, the Preferred Alternative facilitates growth through an infill exemption (RCW 43.21c.229) along frequent transit routes, particularly bus rapid transit. The City may also raise SEPA thresholds citywide (WAC 197-11-800) or in targeted areas in the city.
  - Like Alternatives 2 and 3, the Preferred Alternative includes new climate adaptation and mitigation goals and policies per HB 1181 integrated throughout the Comprehensive Plan elements. The Preferred Alternative also updates critical areas regulations.
  - The Preferred Alternative Comprehensive Plan periodic update will be implemented by BUILDSpokane municipal code amendments that ensures that housing types and densities fulfill HB 1220 requirements. Additional changes would streamline and simplify the code, while also adjusting standards where appropriate for environmental quality and climate resilience such as tree canopy and landscape standards.

Proponent and Lead Agency

City of Spokane

Location

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

Tentative Date of Implementation

Winter 2027

Responsible SEPA Official

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Required Approvals

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

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

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

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

Principal EIS Authors and Contributors

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

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

Draft EIS Date of Issuance

December 18, 2025

Draft EIS Comment Period

The City of Spokane requested comments from the public, agencies, Tribes, and all interested parties on the Draft EIS from **December 18, 2025** to February 18, 2026. Comments were due by 5:00 PM, February 18, 2026. The comment period was extended to **March 5, 2026**. A series of public and agency workshops were held during the Draft EIS comment period as described here: https://my.spokanecity.org/planspokane/draft-eis/.

A Final EIS Issuance

October 26, 2026

Date of Final Action

Winter 2027

Prior Environmental Review

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

Location of Background Data

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

Purchase/Availability of Final EIS

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

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

Printed versions are available at cost from the City.

Distribution List

A notice of availability of the Final Environmental Impact Statement (EIS) was published and distributed to agencies, Tribes, and organizations. It was also provided to those who commented on the Draft EIS per **Chapter 4** Responses to Comments.

Federal and Tribal Agencies

Coeur D'Alene Tribe
Confederated Tribes of the Colville Reservation
Kalispel Tribe of Indians
Spokane Tribe of Indians
U.S. Army corps of Engineers

State and Regional Agencies

Department of Archaeology & Historic Preservation
Department of Commerce
Department of Ecology
Department of Fish & Wildlife
Department of Natural Resources
Department of Transportation
Spokane Regional Clean Air Agency
Spokane Regional Transportation Council

Adjacent Jurisdictions

Spokane County
City of Airway Heights
City of Spokane Valley

Services, Utilities, and Transit

Airway Heights Water
American Medical Response
Avista Utilities
Bonneville Power Administration
Cheney School District
District 81 Capital Projects
Fairchild AFB
Fire District 3
Fire District 8
Fire District 9
Fire District 10
Four Lakes Water District
Inland Power
Mead School District Facilities & Planning
Medical Lake Water
North Spokane Irrigation District #8
Spokane Airports
Spokane Aquifer Joint Board
Spokane County Water District 3
Spokane Regional Health District
Spokane Transit Authority
Whitworth Water
Williams Northwest Pipeline

Community, Organizations, Media

American Indian Community Center
Downtown Spokane Partnership
East Sprague Parking and Business Improvement Area
Native Project
Neighborhood Councils
Northeast PDA

S3R3
Spokane Riverkeeper
Spokane Tribal Network
Spokane University District
The Spokesman-Review
Upper Columbia United Tribes

City of Spokane

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

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1 Summary



1.1 Purpose

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

The ~~Draft~~ Final EIS is organized as follows:

- Chapter **1 Summary**
- Chapter **2 Proposal and Alternatives**
- Chapter **3 Environment, Impacts, and Mitigation Measures**
- Chapter **4 Responses to Comments**
- Chapter ~~4~~ **5 Acronyms and References**
- Chapter 6**5 Appendices**

Changes since the publication of the Draft EIS are shown with ~~strikeout~~or underline or are otherwise noted as additions or changes.

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

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

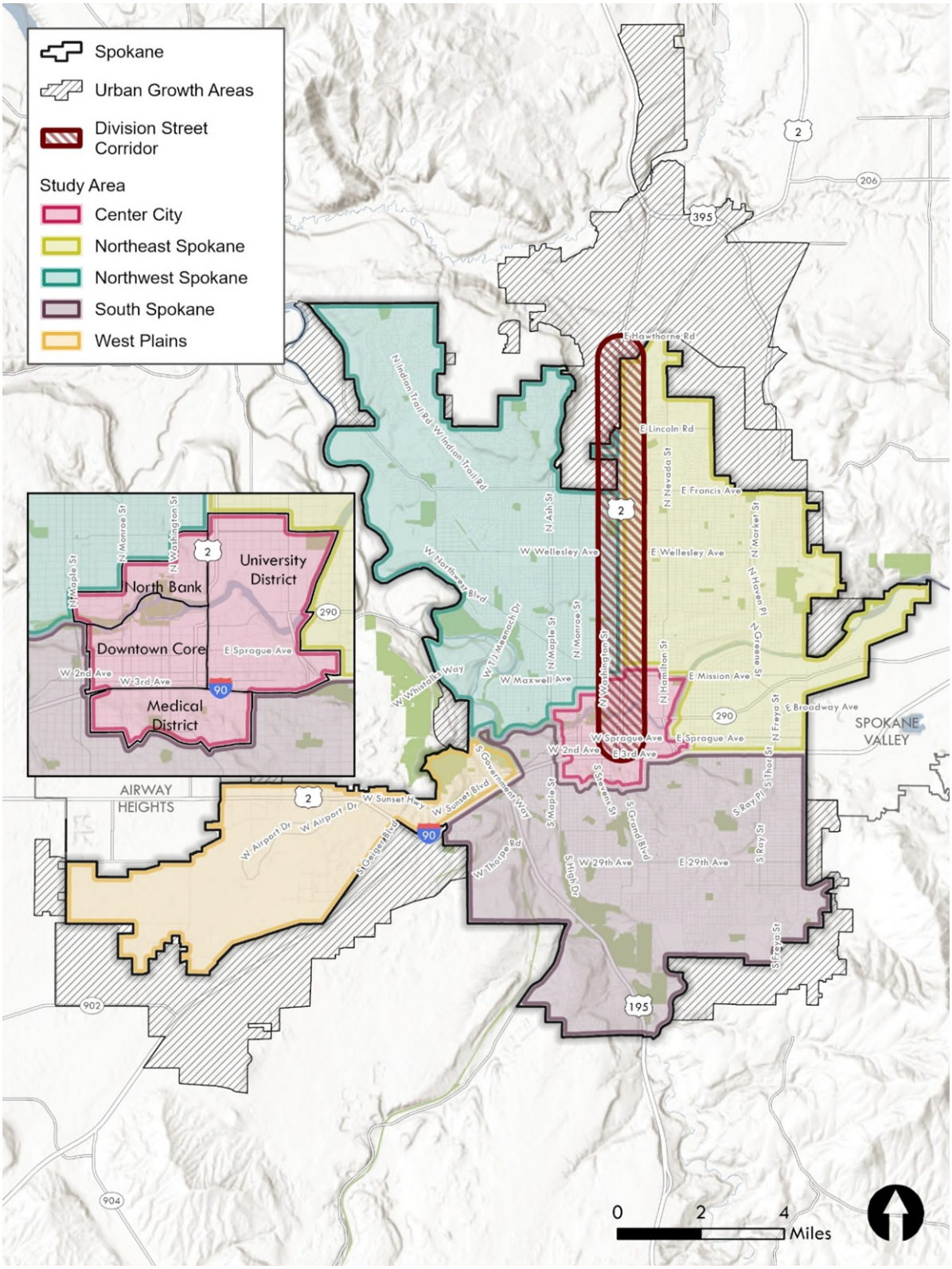
Within these broad subareas the EIS cites Neighborhood Council boundaries. See **Exhibit 1.1-2**.

Spokane Complex Fire

The Spokane community was directly affected by the Spokane Complex fire in August 2026. The City lost approximately 513 dwellings and more than 74 other structures were destroyed in the city limits, with more losses in the surrounding county. There was significant loss of tree canopy as well and numerous effects on the Spokane River and ecological systems within and adjacent to the burn area. The immediate focus of the City is to prioritize emergency response and support rebuilding of homes in affected neighborhoods.

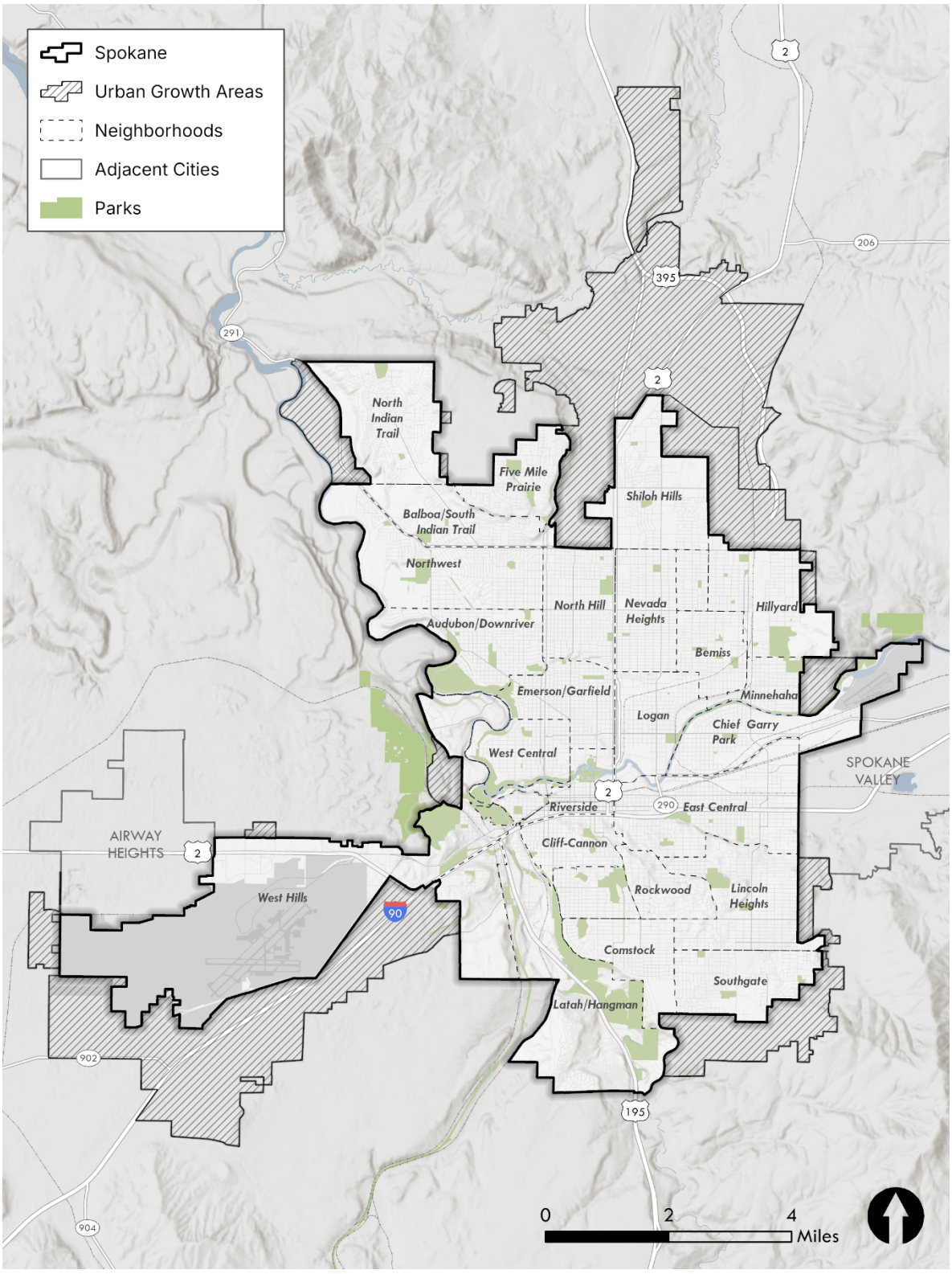
The need to rebuild does not increase the City's 2020-2046 growth targets. Rebuilding has begun and the City will meet its long-term obligations to implement the updated Comprehensive Plan and development regulations to manage growth, provide additional housing and economic opportunities, plan for necessary services and infrastructure (e.g., fire protection, streets, stormwater, parks), improve environmental and climate resilience, and more. ***NOTE:*** *This textbox was added with the Final EIS.*

Exhibit 1.1-1. Spokane Study Areas



Sources: City of Spokane, BERK, 2025.

Exhibit 1.1-2. City of Spokane Neighborhoods



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

1.2 Public Comment Opportunities

The City of Spokane ~~is requesting~~requested comments from the public, agencies, Tribes, and all interested parties on the Draft EIS from **December 18, 2025 to February 18, 2026**. Comments ~~are~~ were due by **5:00 PM, February 18, 2026**. ~~See the Fact Sheet for the method to provide comments. A series of public and agency workshops are planned during the Draft EIS comment period.~~

A series of public and agency workshops were held during the Draft EIS comment period as described here: ~~For the latest information on the workshop topics and times, please see the project website at:~~ https://my.spokanecity.org/planspokane/draft-eis.

Based on the comments on the Draft EIS and public engagement through the Plan Commission and City Council the City Council defined a preferred alternative studied in the Final EIS.

1.3 Objectives, Proposal, and Alternatives

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

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

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

> *Spokane aims to foster a vibrant, resilient, and inclusive city by supporting economic growth, environmental stewardship, and the diverse needs of the whole community. The City is dedicated to*

ensuring access to attainable housing, safe streets, and thriving neighborhoods while inspiring innovation, cultural vitality, and connection for all Spokane residents.

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

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

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

Exhibit 1.2-1. Growth Alternatives – Comparison of Features

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

	Alternative 1: Stay the Course	Alternative 2: Distributed and Balanced	Alternative 3: Center City and Regional Hubs	Preferred Alternative
Housing Affordability Targets: 2022-2046	0-80% Area Median Income (AMI): Insufficient 80-120% AMI: Sufficient 120+% AMI: Sufficient	Meets all income levels. Denser housing in proximity to transit. Inclusion of new mixed-use zones. Meets state requirements (HB 1491) for transit-oriented development near bus rapid transit.	Like Alternative 2. Provides housing at all income levels with priority for denser housing along bus rapid transit per state requirements (HB 1491), and other focused areas.	Similar to Alternatives 2 and 3. Meets all income levels. Denser housing in proximity to transit. Inclusion of new zoning regulations to meet state requirements.
Population Growth Ranges: 2022-2046	25,157 City's share of OFM medium population forecast			
Job Projections 2022-2046 ** Each alternative studies a job projection from a different data source to support infrastructure planning. The different numbers are not based on an alternative's likelihood to produce more or fewer jobs.*	Regional (SRTC) Projection 34,850 net jobs. This is about 15,000 jobs above historic trend per Census.	State (ESD) Projection 24,939 net jobs This is about 5,000 jobs above historic trend.	Moderate-High Projection 38,848 net jobs This is about 19,000 jobs above historic trend. Directed to Center City, West Plains, and Hillyard/ Northeast public development authorities.	34,850 net jobs Regional SRTC Projection 15,000 jobs above historic trend

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Source: City of Spokane, BERK, ~~2025.~~ 2026.

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

Exhibit 1.2-2. Ability to Meet SEPA Objectives

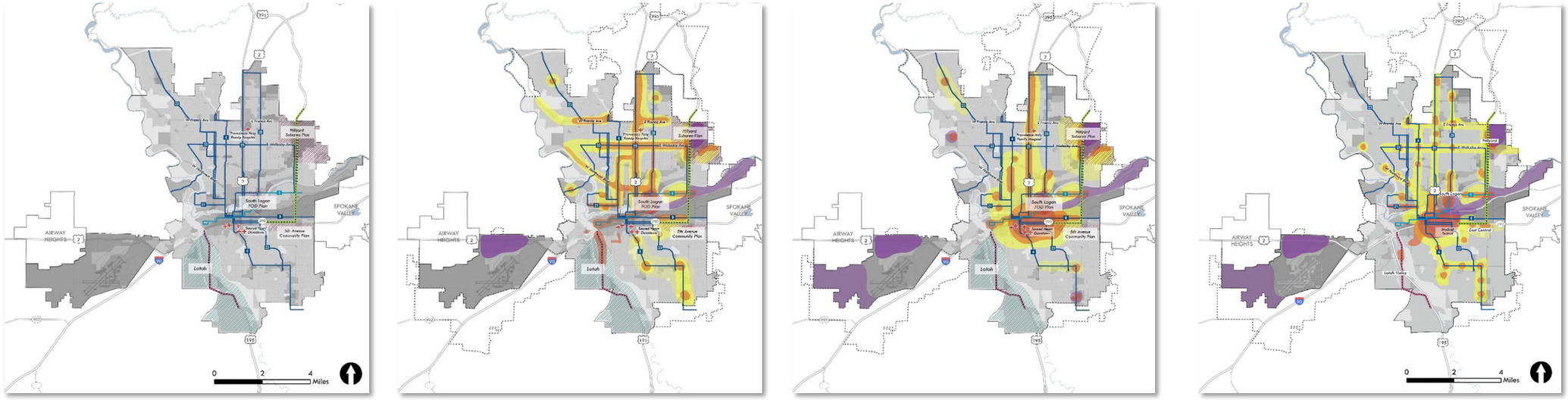
Objectives	Alternative 1: Stay the Course	Alternative 2: Distributed and Balanced	Alternative 3: Center City and Regional Hubs	Preferred Alternative
Meet Periodic Update Requirements	Less	Most	Most	Most
Accommodate Growth: Housing at All Affordability Levels	More	Most	Most	Most
Accommodate Growth: Jobs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

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Source: City of Spokane, BERK, ~~2025.~~2026.

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

Exhibit 1.2-3. 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, ~~2025.~~2026.

Exhibit 1.2-4. Example Land Uses

Residential



Single Family with ADU



Six Plex (S Grand Blvd.)



Lowrise Apt (605 S Grand)



Box Car, Univ. District

Low Density Housing	Moderate Density Housing	High Density Housing

Commercial/Mixed Use



Corner Cafe (Maple Street)



Shopping Center



Nonna Mixed Use



River Park Square

Neighborhood Commercial	Commercial	Mixed Use	Downtown

Industrial/Employment



West Plains Area



Spokane Med. District



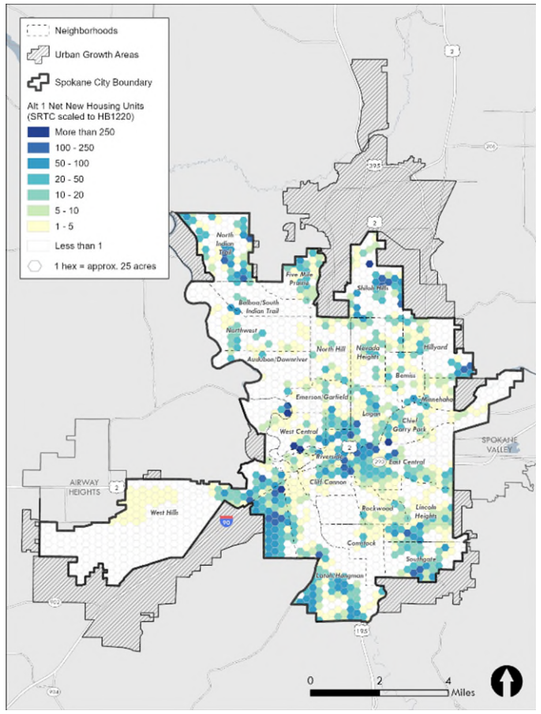
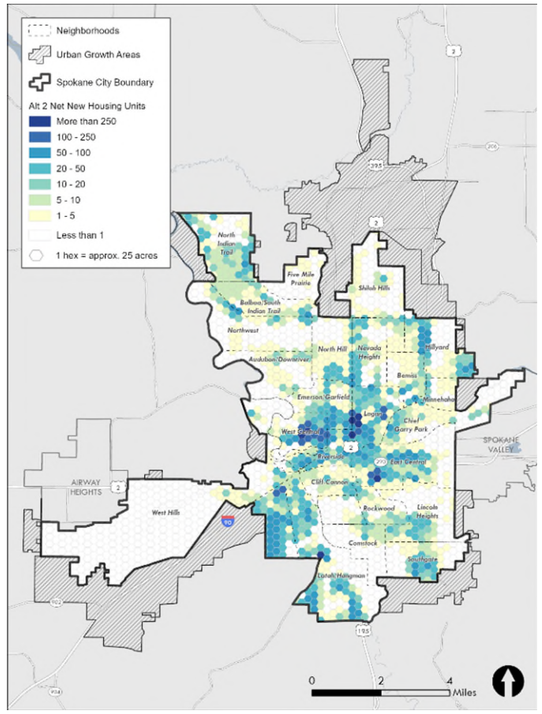
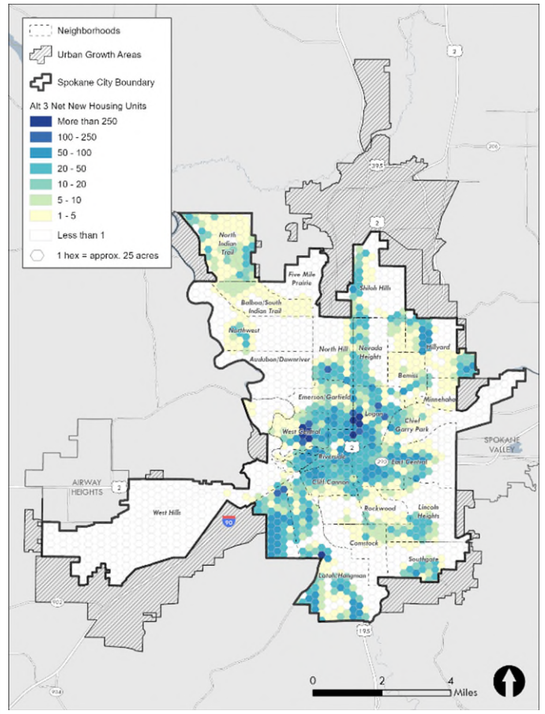
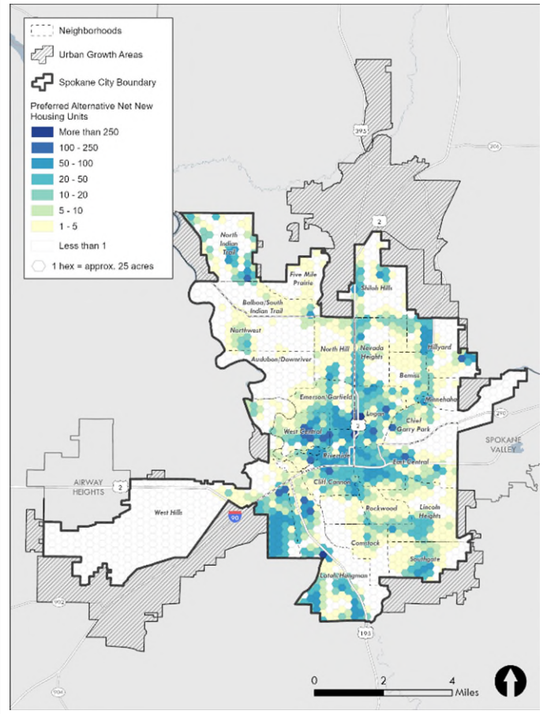
Trent Avenue



860 E Spokane Falls

Light Industrial	Employment Light	Heavy Industrial	Employment Heavy

Exhibit 1.2-5. Growth Distribution Maps – Housing

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

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Source: City of Spokane, BERK, ~~2025.~~ 2026.

Legend – Net New Housing Units

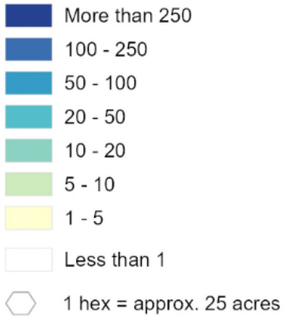
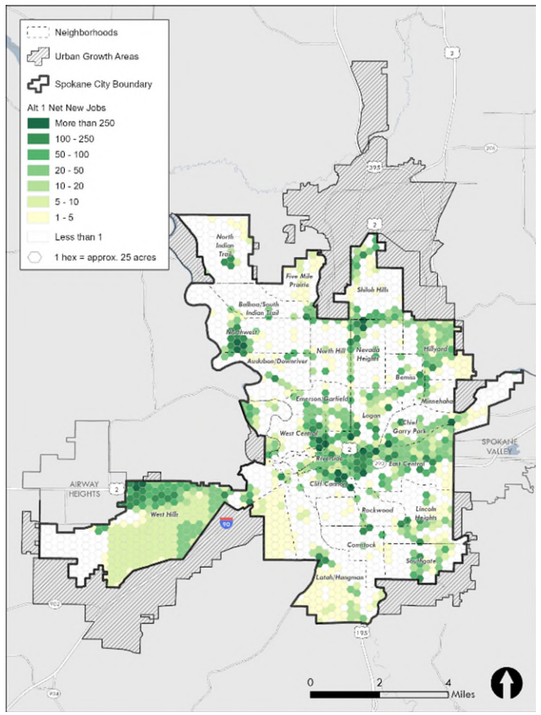
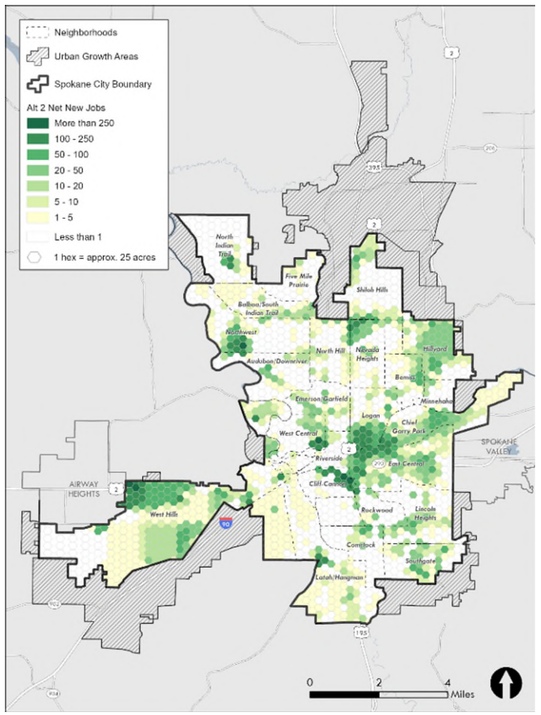
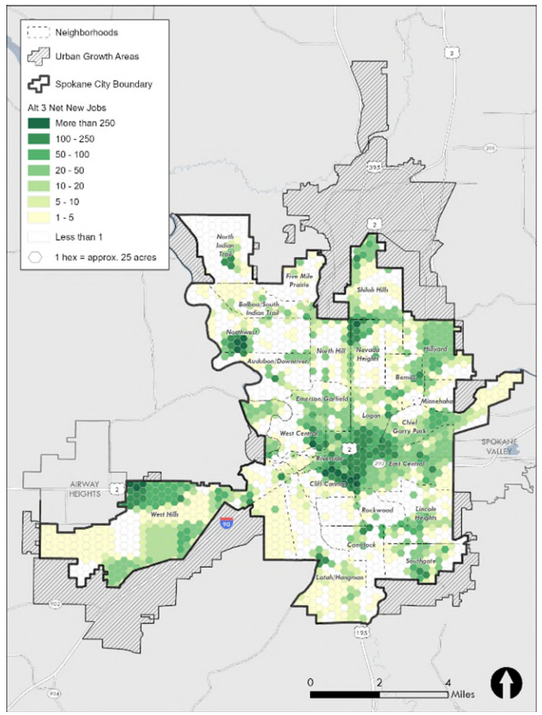
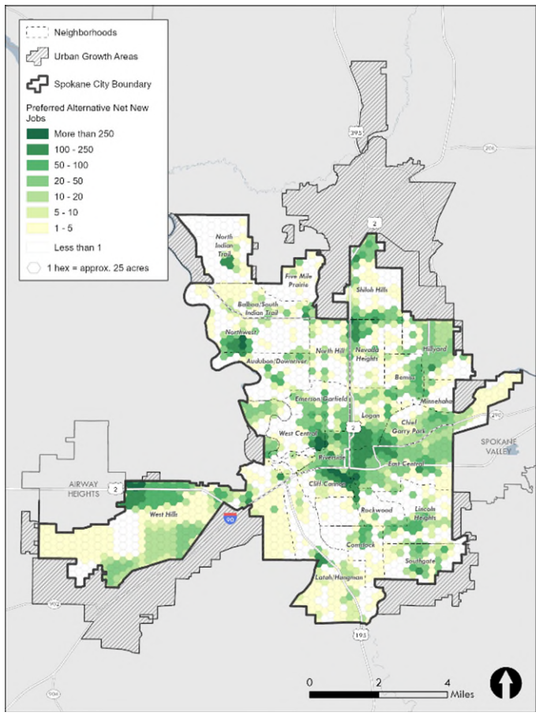
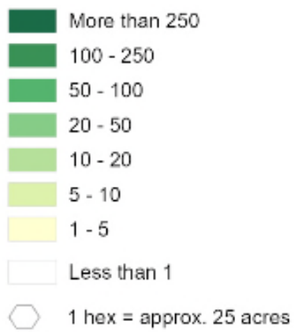


Exhibit 1.2-6. Growth Distribution Maps – Jobs

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

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Source: City of Spokane, BERK, ~~2025.~~ 2026.

Legend – Net New Jobs



1.4 Key Issues and Options

The key issues facing decision makers include:

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

1.5 Summary of Impacts and Mitigation Measures

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

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

- Public Services
- Utilities

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

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

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

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Adverse Impacts: Most impacts (▼▼), More impacts (▼), Less impacts. (▽).
Potential Beneficial Impacts/Mitigation: Neutral Impacts or Continued Plan/Code (—), Moderately positive (△), or Positive (▲). For example: New Climate Adaptation and Mitigation Policies, Critical Area Policy Amendments and Code Updates, and Effects of Increased Housing Affordability/Reduction of Disparate Impacts Policies.

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

Potential Impact and Indicators	Alt. 1	Alt. 2	Alt. 3	Preferred
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	▼	▽	▽	▽

Potential Impact and Indicators	Alt. 1	Alt. 2	Alt. 3	Preferred
Environmental Justice – Growth in Areas with Health and Social Disparities and Greater Service Demand	▽	▼	▼▼	▼
Utilities *(section 3.9.2)*				
Power, Water, Wastewater Demand	▼	▽	▽	▽
Power, Water, Wastewater Infrastructure Upgrades	▽	▼	▼	▼
Stormwater Generation	▼	▽	▽	▽
Strength of Mitigation Potential – Plan and Code Updates	—	▲	▲	▲

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Impacts: Most impacts (▼▼), More impacts (▼), Less impacts. (▽), Moderately positive (△), or Positive (▲).
Potential Beneficial Impacts/Mitigation: Neutral Impacts or Continued Plan/Code (—), Moderately positive (△), or Positive (▲). For example: New Climate Adaptation and Mitigation Policies, Critical Area Policy Amendments and Code Updates, and Effects of Increased Housing Affordability/Reduction of Disparate Impacts Policies.

1.5.1 Earth, Water Quality, and Water Resources



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

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

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

Thresholds of significance used in this analysis include:

- **Environmental Earth and Soil Hazards:** Disturbances of existing contaminated areas to levels that could endanger human health or the environment.
- **Surface Water Quality**: Increases in amount of pollution to receiving waters that would impair their designated uses (such as human contact and fish habitat).

- **Runoff Increases:** Impervious surface expansions that would increase runoff flow volumes and durations to streams by magnitudes resulting in bank scour and erosion.
- **Groundwater Recharge:** Impervious surface expansions that would decrease groundwater recharge beyond designated limits.
- **Groundwater Quality:** Increases in amount of pollution discharged to levels that would contaminate groundwater supplies.

What impacts did we identify?

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

What is different between the alternatives?

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

- Projections for increased housing are the metrics with the most weight and are used in the earth and water resources impacts analysis as indicators of increased rainfall runoff. The amount of land with hard surfaces versus vegetation impacts how much and how quickly rainfall runoff and pollutants may soak into the earth or are transported to natural receiving waters. Housing density distribution differs across the alternatives. By creating more density in areas that are currently developed, Alternative 3 has the lowest expected pollution and stormwater runoff impacts and the Preferred Alternative has the second lowest impacts, with Alternative 2 ~~has the second lowest~~having medium impacts. Alternative 1, in contrast, places more growth in areas with more undeveloped land.
- Job projections are the metrics with the least weight in the earth and water resources impact analysis and are used as indicators of increased pollution. Job projections differ, with Alternative 1 ~~and~~ , Alternative 3, and the Preferred Alternative having the greatest job growth and therefore the greatest potential increased pollution impacts compared to Alternative 2.
- Alternatives 2 and 3 and the Preferred Alternative have the strongest mitigation due to including code update, a new Climate Element, and critical area regulations updates.

What are some solutions or mitigation for impacts?

- Alternatives 2 and 3 and the Preferred Alternative include a new Climate Element with climate resilience and greenhouse gas reduction goals and policies.
- Alternatives 2 and 3 and the Preferred Alternative review and update critical areas regulations.
- Federal, state, and regional regulations on water quality, shoreline management, floodplain management, flood insurance, endangered species, stormwater management, highway runoff, erosion control, hydraulic control, and environmental standards also mitigate (by preventing or minimizing) most impacts from development.
- The City could continue advocating for projects that separate the storm drainage system from the combined sewer system, which may reduce combined sewer overflows during heavy rainfall events.
- The City could continue partnering with local governments and academic institutions to support ongoing study and monitoring of earth and water resources in the study area, and could continue implementing public education and involvement campaigns to help protect and improve earth and water resources.
- The City could consider additional measures such as installing updated stormwater controls on roadways, prioritizing opportunities to restore critical area buffers, protecting and expanding tree canopy, and following recommendations of a recent environmental code audit.

With mitigation, what is the ultimate outcome?

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

1.5.2 Air Quality/Greenhouse Gases

How did we analyze Air Quality/Greenhouse Gases?

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

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

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

What impacts did we identify?

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

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

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

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

What is different between the alternatives?

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

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

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

The Preferred Alternative produces the lowest transportation-sector emissions and the second-lowest energy-sector emissions among the alternatives. Prioritizing public transit and concentrating housing growth in major city hubs along bus rapid transit corridors reduces VMT, which in turn lowers transportation emissions. Although the Preferred Alternative has the same projected employment capacity as Alternative 1, it results in lower energy-sector emissions because it includes a greater proportion of multifamily housing.

What are some solutions or mitigation for impacts?

- Alternatives 2 and 3 and the Preferred Alternative update the existing comprehensive plan policies, including those that protect the natural environment and reduce pollution, and also include new climate resilience and greenhouse gas reduction goals and policies. New climate policies addressing GHG and VMT reduction and Community Resilience.
- Federal, state, and regional regulations help to mitigate impacts from criteria pollutants, vehicle emissions, and other air quality hazards.
- Washington State regulations, like the Climate Commitment Act, Clean Energy Transformation Act, Clean Buildings Performance Standard, Clean Buildings Act, energy codes, and zero-emission vehicle standards, support the City in reducing greenhouse gas emissions.
- Spokane's 2021 Sustainability Action Plan also addresses renewable electricity targets and how to achieve them while mitigating risks from climate change and investing in strengthening Spokane communities.
- The City could consider additional investment in multi-modal transportation infrastructure, fees that reduce traffic congestion, greater land use mix and density, electric vehicle adoption, incentives for building electrification and energy efficiency, designated truck routes, tree canopy protection and enhancement, street sweeping to reduce dust, zoning standards and other codes that reduce poor air quality exposure, and increased education on air pollutants.
- Per SMC Section 15.05.020, the City has a goal to reduce GHG emissions created by activities within the boundaries of the City of Spokane to 45% below 2016 levels by 2030; 70% below 2016 levels by 2040; and 95% below 2016 levels and net zero emissions, by the year 2050. The City regularly prepares GHG inventories consistent with SMC 15.05.060 addressing City operations and community based emissions.
- The City maintains a Comprehensive Emergency Management Plan (CEMP) to address how it prepares for, responds to, and recovers from emergencies and disasters.

With mitigation, what is the ultimate outcome?

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

1.5.3 Plants and Animals



Ponderosa Pine, City of Spokane, 2024

How did we analyze Plants and Animals?

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

Thresholds of significance used in this analysis include:

- **Best Available Science:** An alternative would be inconsistent with or counter to best available science.
- **Threatened and Endangered Species:** An alternative may have adverse effects to state or federally listed threatened or endangered species or their habitats that could not be sufficiently addressed through avoidance, minimization, or mitigation measures, and could potentially result in an up-listing or jeopardy determination.

- **Other Species:** An alternative could have population-level adverse effects to other important non-listed plant or wildlife species (e.g., priority species, migratory birds) that would be perceptible and measurable within the surrounding region.
- **Habitat Conversion:** An alternative would potentially result in permanent habitat conversion, or loss of habitat connectivity sufficient to compromise overall regional ecosystem function relative to current conditions.

What impacts did we identify?

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

What is different between the alternatives?

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

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

What are some solutions or mitigation for impacts?

- Alternatives 2 and 3 and the Preferred Alternative include new climate resilience and greenhouse gas reduction goals and policies, which could also support plant and animal habitats.
- Alternatives 2 and 3 and the Preferred Alternative also review and update the City's critical areas regulations best on best available science.
- Federal, state, and local regulations can minimize impacts to wildlife, including the Endangered Species Act, Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act, Section 404 of the Clean Water Act, the Washington State Growth Management Act, the Washington Shoreline

Management Act, several sections of the Washington Administrative Code, and the City's Environmental Standards provisions of in Title 17E of the SMC and the Spokane Shoreline Master Program.

- The City could consider increased program resources for the SpoCanopy tree canopy cover program, incentive programs for habitat conservation and restoration, land acquisition opportunities in key areas, adaptive management policies for critical area and shoreline codes, and critical areas code language that limits clearing and soil disturbance.

With mitigation, what is the ultimate outcome?

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

1.5.4 Land Use Patterns and Urban Form



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

How did we analyze Land Use Patterns and Urban Form?

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

Thresholds of significance used in this analysis include:

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

What impacts did we identify?

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

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

disturbance to archeological resources during construction and effects to historic properties under all alternatives.

What is different between the alternatives?

Land Use and Urban Form Compatibility

- Alternative 1 continues existing zoning so minimal new conflicts between adjacent land uses are expected. Existing scale and form patterns would be maintained, and abrupt transitions could occur where high density Centers meet lower-density neighborhoods. There would be limited improvements in street connectivity, sidewalks, and public realm design.
- Alternative 2 maintains existing network of centers and corridors but better connects them by encouraging greater integration of mixed-use development and commercial activities along transit-rich corridors. Alternative 2 may reduce large-scale incompatibility between land uses by spreading growth in existing center and corridors and employment hubs. Small-scale, neighborhood-oriented retail nodes may create conflicts in some residential areas in terms of noise and traffic. Changes in building height or scale could contrast with low density neighborhoods as gradual densification occurs. More street-level design and pedestrian infrastructure could occur and improve walkability.
- Alternative 3 directs most of the new housing, mixed-use development, and job growth toward major hubs, particularly Center City and the University District as well as West Plains and Hillyard. Concentration of high-intensity residential, commercial, and industrial uses may create sharp transitions between dense hubs and lower-density neighborhoods. More intense building scale, massing, and intensity would be located in major hubs. There may be more intense development in Center City to the south and west compared to current uses and plans. Transitions from Center City are expected to be gradual.
- The Preferred Alternative strives for a balance between the hub-oriented growth of Alternative 3 and the corridor-focused approach of Alternative 2, combining high-density housing, mixed-use development, and job growth at major hubs with the integration of housing and commercial activity along transit-rich corridors. Concentrations of high-intensity residential and commercial uses at major hubs may still create sharp transitions with adjacent lower-density neighborhoods, and industrial intensification in certain areas, particularly the Northeast, may warrant attention to surrounding land uses.

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 districts 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.
- Preferred Alternative: While concentrated development pressure in Center City and Hillyard, as well as new mixed-use nodes or corridors, could increase the potential to disturb cultural resources or alter and demolish historic buildings and districts, the Preferred Alternative's focus on already urbanized areas can reduce the risk to undisturbed cultural or historic resources compared to Alternative 1. Remaining potential impacts can be managed through proactive measures, including advance review and application of historic preservation and cultural resource policies and regulations, as well as incentives to encourage adaptive reuse.

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.
- The Preferred Alternative blends Alternatives 2 and 3 and could have similar impacts, however, this alternative intentionally distributes mixed-use development and services, which can improve access for historically underserved communities by encouraging transit use and shorter trips, thereby reducing air pollution and heat island effects.

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 and regulation 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.
  - Another advanced planning effort could involve the preparation of a citywide historic preservation plan which could be used as a tool for developers to avoid major impacts to highly concentrated areas of historic 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 surveys and consideration of impacts to historic and cultural resources results in more effective identification, planning, and protection than reactive responses to inadvertent discoveries during project implementation. A well-designed and implemented citywide historic preservation plan and pre-project historic and cultural resource review process is the most effective way to avoid, minimize, or mitigate adverse impacts.

1.5.5 Population, Employment, and Housing



Duplex, City of Spokane, Undated

How did we analyze Population, Employment, and Housing?

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

Thresholds of significance used in this analysis include:

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

- Job types and quantity and ability to advance City and regional economic development strategies.

What impacts did we identify?

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

What is different between the alternatives?

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

Housing Variety and Opportunities

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

- Alternatives 2 and 3 and the Preferred Alternative would advance more strategies from the City's Housing Action Plan such as streamlining permitting, improving infrastructure, targeting higher intensity development near transit, and other strategies to reduce racially disparate impacts consistent with new Housing Element requirements.

Housing Production and Displacement

Potential for Physical Displacement: Based on growth patterns, Alternatives 2 and 3 and the Preferred Alternative are expected to demolish ~~over~~ about 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 and the Preferred Alternative, 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 1.5-3**~~Exhibit 1.4-3~~.

Exhibit 1.5-3. Potential to Reduce Economic Displacement Pressure

Ability to Reduce Economic Development Pressure	Alt 1	Alt 2	Alt 3	Preferred
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
NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.

Employment

- Based on the applied employment projections, Alternatives 1 and 3 and the Preferred Alternative 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 and the Preferred Alternative would make these updates.

What are some solutions or mitigation for impacts?

- Updates to the comprehensive plan under Alternatives 2 and 3 and the Preferred Alternative would address housing growth targets at all income levels, evaluate racially disparate impacts and displacement, and remove barriers to housing.
- The City of Spokane's 2021 Housing Action Plan provides short, medium, and long-term strategies to address the community's housing needs. A number of strategies have already been implemented.
- StartUp Spokane is a program of Greater Spokane Inc., which in partnership with the Spokane Public Library and Spokane County Library provides business resources for entrepreneurs.
- The Small Business Administration Strategic Alliance Memorandum was signed by the U.S. Small Business Administration, City of Spokane, and the AHANA Multi-Ethnic Business Association in September 2022. It establishes a heightened level of commitment to work together to bring services to underserved populations of entrepreneurs.
- Other strategies the City could consider include anti-displacement measures detailed in the Housing Action Plan and the updated housing element based on the City's racially disparate impacts evaluation, including a Rental Assistance Fund, Public Development Authority, land banking, use of development agreements, setting minimum density requirements, providing incentives for affordable commercial tenant space, and other efforts.

With mitigation, what is the ultimate outcome?

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

1.5.6 Relationship to Plans, Policies, and Regulations

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

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

Thresholds of significance used in this analysis include:

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

What impacts did we identify?

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

What is different between the alternatives?

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

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

What are some solutions or mitigation for impacts?

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

With mitigation, what is the ultimate outcome?

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

1.5.7 Transportation



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

How did we analyze Transportation?

The thresholds used to determine the impacts of all ~~three~~ alternatives include both quantitative and qualitative assessments, which are described in **Exhibit 1.5-4**~~Exhibit 1.4-4~~.

Exhibit 1.5-4. Transportation Thresholds of Significance

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

Performance Metric	Thresholds of Significance
	an impact occurs if a state facility does not meet the standard set by WSDOT (LOS D, segment volume-to-capacity (v/c) 1.00). **Action Alternatives:** A significant impact is identified if an intersection (city or state facility) degrades from an acceptable LOS in the No Action scenario; if the intersection already exceeds LOS thresholds in the No Action scenario, then an impact is identified if delay increases by 5 or more seconds. For state route segments, a significant impact is identified if the segment v/c increases by ≥0.05 at a location already at or above 1.00 under the No Action alternative.
VMT per Capita and Mode Share	Alternative 1 (No Action): A significant impact is identified if daily VMT per capita increases by ≥ 1.0 miles/person or if SOV (drive alone) share increases by ≥ 1.0 percentage point over 2024 conditions. Action Alternatives: A significant impact is identified if daily VMT per capita increases by 0.2 miles/person or if SOV share increases by 0.2% relative to the No Action alternative.

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

What impacts did we identify?

Exhibit 1.5-5~~Exhibit 1.4-5~~ summarizes impact findings across the alternatives. The purpose of this programmatic EIS is to disclose how potential land use may affect the transportation system relative to what would occur with currently adopted designations and policies (the No Action alternative). Accordingly, the impacts of each Action alternative are assessed against the performance of No Action. Impacts expected to occur as a result of the No Action alternative are also expected under the Action alternatives, even if the Action alternatives do not result in additional significant impacts.

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

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

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

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

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

Exhibit 1.5-5. Summary of Significant Impacts

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

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Source: Fehr & Peers, 2026.~~2025~~

What is different between the alternatives?

Vehicle Miles Travelled

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

With Alternative 2, total vehicle miles traveled (VMT) in Spokane are expected to be slightly lower than with the No Action Alternative. VMT is expected to decrease to 5,732,000 on an average weekday, 3.3% below the No Action alternative. This translates to a VMT per capita decrease~~s~~ from 19.9 (No Action) to 19.2 (Alternative 2). This reduction reflects the "distributed & balanced" growth pattern placing more new housing and jobs in established centers and along frequent transit corridors, for example the Center City and the Division Street areas, which would shorten average trip lengths. It also reflects slightly lower job growth than Alternative 1, ~~and~~ Alternative 3, and the Preferred Alternative, more similar to the current jobs/housing balance. See **Exhibit 1.5-6**~~Exhibit 1.4-6~~.

With Alternative 3, total vehicle miles traveled in Spokane are expected to be 5,916,000 on an average weekday, which is slightly below the VMT with No Action and slightly higher than VMT with Alternative 2 and Alternative 1. This translates to a VMT per capita decrease from 19.9 (No Action) to 19.8 (Alternative 3). This slight decrease reflects growth focused in the Center City and select regional hubs, which brings more trips closer to destinations and frequent transit routes. However, although Alternative 3 places more housing and jobs in the Center City than Alternative 2 and the Preferred Alternative, it also assumes continued employment growth in industrial hubs, most notably the West Plains/Airport area and Northeast/Hillyard, which increases trips and yields higher total VMT than Alternative 2. See **Exhibit 1.5-6**~~Exhibit 1.4-6~~.

With the Preferred Alternative, total vehicle miles traveled are expected to be 5,717,000 on an average weekday, which is lower than the other alternatives. This translates to a VMT per capita decrease from 19.9 (No Action) to 19.1 (Preferred Alternative). This reduction reflects a blend of the growth patterns growth focused in the Center City, select regional hubs, and along corridors with frequent transit service, similar to Alternatives 2 and 3. The Preferred Alternative also plans for lower job growth than Alternative 3 like Alternative 1, consistent with regional transportation modeling.

Exhibit 1.5-6. Existing (2024) and Alternatives VMT per Capita

	Existing (2024)	2046 Alt 1 (No Action)	2046 Alt 2	2046 Alt 3	Preferred
VMT per Capita	17.9	*19.9*	*19.2*	*19.8*	*19.1*

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Sources: SRTC, Fehr & Peers, 2026.~~2025~~

Compared to No Action, Alternative 2 is expected to have a slight shift from shared-ride vehicular trips to active modes with approximately 86,400 walking trips and 16,700 biking trips on an average weekday, about 900 more walk trips and 100 more bike trips than No Action. See **Exhibit 1.5-7**~~Exhibit 1.4-7~~.

Compared to No Action, Alternative 3 is expected to have a slight shift from shared-ride vehicle trips to active modes with approximately 88,600 walking trips and 17,000 biking trips per day, which is about 3,100 more walk trips and 400 more bike trips than No Action. This is greater than the expected added non-motorized trips than Alternative 2. See **Exhibit 1.5-7**~~Exhibit 1.4-7~~.

Compared to No Action, the Preferred Alternative is expected to have a slight shift from shared-ride vehicle trips to active modes with approximately 87,200 walking trips and 16,800 biking trips per day, which is about 1,700 more walk trips and 200 more bike trips than No Action. See **Exhibit 1.5-7**~~Exhibit 1.4-7~~.

Exhibit 1.5-7. Mode Share – Existing and Alternatives

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

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Sources: SRTC, Fehr & Peers, 2026.~~2025.~~

Safety

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

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

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

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

Vehicle Network, Transit, Freight

Compared to Existing (2024), 10 intersections are expected to remain at the same LOS, and 12 are expected to decline by one or more LOS grade. Despite the increase in delay, 16 of 22 intersections are still expected to meet their LOS standard under No Action. See **Exhibit 1.5-8**~~Exhibit 1.4-8~~.

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

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

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

The remaining locations that could fail to meet the standard under the Preferred Alternative are S Hatch Road and E 57th Avenue, US 2/N Division Street and W Wellesley Avenue, and US 2/N Division Street and W Francis Avenue. At these intersections, delay is expected to incrementally improve compared to the No Action Alternative.

Exhibit 1.5-8. Spokane Intersection LOS – All Alternatives

Study Intersection	LOS Standard	2046 Alt 1 (No Action) LOS	2046 Alt 2 LOS	2046 Alt 3 LOS	Preferred
S Hatch Rd and E 57th Ave (One-way stop control)	E	**F**	***F***	***F***	***F***
S SE Blvd and E 29th Ave	E	D	*D*	*D*	*D*
S Grand Blvd and E 29th Ave	E	C	*C*	*C*	*C*
N Havana St and E Sprague Ave	E	E	*D*	*D*	*D*
N Napa St and E Sprague Ave	E	C	*C*	*C*	*C*
SR 290/E Trent Ave and N Hamilton St	D	**F**	***E***	***E***	***E***
US 2/S Division St and E Sprague Ave*	F	C	*C*	*C*	*C*
US 2/N Ruby St and E Indiana Ave*	D	D	*D*	*D*	*D*
US 2/N Division St and W Buckeye Ave/E North Foothills Dr	D	C	*C*	*C*	*C*
US 2/N Division St and Wellesley Ave	D	**F**	***F***	***F***	***F***
US 2/N Division St and W Francis Ave*	D	**E**	***E***	***E***	***E***
US 2/N Newport Hwy and E Holland Ave	D	D	*D*	*D*	*D*
W 3rd Ave and S Monroe St	F	B	*B*	*B*	*B*
N Maple St and W Boone Ave	E	C	*C*	*C*	*C*
E Mission Ave and N Hamilton St	E	D	*D*	*E*	*E*
N Market St and E Euclid Ave	E	D	*D*	*D*	*D*
N T J Meenach Dr and W Northwest Blvd*	E	E	*E*	*D*	*D*
N Ash St and W Wellesley Ave	E	C	*C*	*C*	*C*
E Wellesley Ave and N Haven St*	E	E	*E*	*E*	*E*
N Market St and E Francis Ave	E	D	*D*	*D*	*D*
SR 291/W Francis Ave and N Alberta St	D	**E**	*D*	*D*	*D*
US 2/W Sunset Hwy and Flint Rd	D	**F**	***F***	***F***	***E***

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Notes: *Analyzed with HCM 2000; **BOLD** indicates LOS fails to meet standard
Sources: City of Spokane, WSDOT, Fehr & Peers, ~~2025~~2026.

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

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

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

The Preferred Alternative does not introduce significant intersection impacts relative to No Action with no new locations expected to exceed LOS thresholds and delay expected to improve incrementally. Therefore, no significant intersection impacts are identified under the Preferred Alternative.

What are some solutions or mitigation for impacts?

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

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

The Draft Transportation Element addresses goals and policies and its Appendix contains the 20-year Draft Transportation Facilities Plan including planned multimodal improvements and a funding strategy.

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

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

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

- Transportation Demand Strategies (TDM)

- TSMO and Signal Timing
- Agency Partnerships

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

- Implementing the Commute Trip Reduction (CTR) program, including CTR Four-Year Plan Update (2025–2029) providing employers, residents, and students with a mix of education, incentives, and resources to facilitate mode shift.
- Transportation Systems Management & Operations (TSMO) is a programmatic strategy that improves reliability with intelligent transportation systems (ITS) and operational refinements rather than major construction. Core tools include periodic signal retiming and coordination, refined phase/split/offset plans, protected–permissive turn phasing and right-turn overlaps, leading pedestrian intervals and updated pedestrian clearance, upgraded detection and, where appropriate, transit signal priority and queue jumps.
    - For the intersection of SR 290/E Trent Avenue and N Hamilton Street, the South Logan Transit-Oriented Development (TOD) Plan identifies signal tools such as signal phase adjustments and right-turn overlaps to maintain operations as the area develops. This EIS is consistent with that approach, and the same signal timing adjustments can be implemented and adjusted as volumes grow.
- Complementary TSMO strategies including wayfinding and driver information to parallel routes like the adjacent Martin Luther King Jr Way corridor can help redistribute peak traffic and avoid oversaturation of the intersection. Together, these programmatic measures paired with ongoing monitoring and retiming can maintain operations as land-use activation occurs.
- Partnering with the County and other regional agencies on a unified TDM program leverages resources to provide a robust program with opportunities for targeted programs within the City.
- Based on an analysis of effective approaches to reduce VMT, the City is incorporating strategies into its periodic update including mixed use along transit corridors, infill development, missing middle housing, reduced parking requirements, TDM implementation, and increasing multimodal capacity. VMT targets include retaining existing levels as a reasonable sign of progress for the Department of Commerce five-year check-in, and 5% reduction of existing VMT over the 20-year planning period. The City addresses monitoring metrics in its proposed Comprehensive Plan.

With mitigation, what is the ultimate outcome?

Relative to No Action, the action alternatives would maintain or incrementally improve mode share and have lower VMT per capita, which translates into slight improvements or no change in transit, freight, and safety performance. Implementing the action alternatives would not cause any additional intersections to fall below standards, and for intersections that already fall below the LOS standard under No Action, the action alternatives would add less than 5 seconds of average control delay relative to No Action. In addition, the Action alternatives would maintain all evaluated state facilities below a v/c ratio of 1.0 and would not degrade pedestrian or bicycle operations at the citywide scale.

Therefore, applying the thresholds of significance, ~~neither~~ none of the studied action alternatives ~~is~~ are expected to result in a significant adverse transportation impact.

1.5.8 Public Services



Cart Tagging, Recycling, City of Spokane, Undated.

How did we analyze Public Services?

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

Thresholds of significance used in this analysis include:

- **Police/Fire/EMS** – Increased demand for police or fire and emergency that cannot be accommodated through regular planning and staffing processes.
- **Schools** – Increased public school enrollment and demand on capital facilities, and broadband that cannot be addressed through regular school planning processes.

- **Parks** – Decreased park level of service (LOS), as defined in the Spokane Parks Master Plan (acres of developed park land per 1,000 people, and percent of households that can reach a public park or school ground in 10-minute walk)
- **Libraries** – Recommended square feet per capita LOS not met, as defined in the City of Spokane Capital Facilities Plan
- **Solid Waste** – Collections per household per month that would result in major investments exceeding what is already planned.
- **Environmental Justice**
  - Growth in areas with existing health disparities would result in increased demand on emergency medical services and impact response times.
  - Growth in areas with high social vulnerability would result in greater pressure on existing parks and recreation services.

What impacts did we identify?

There is a similar citywide range of population expected under all alternatives, and there will be a greater demand for police, fire/emergency medical services, schools, parks, libraries, and solid waste under all alternatives. This includes a need for more police officers, more fire and EMS staff, more school capacity, more parks, more library square footage, and more solid waste collection positions. All alternatives also plan for growth in areas with existing health and social disparities. This may have impacts on public services by creating more demand for emergency services and parks in certain areas of Spokane. All ~~three~~ alternatives place between ~~31~~ 40 and ~~34~~46% of growth in areas with a high percentage of self-reported poor physical health, which may increase demand for emergency services where there is already higher demand – Alternative 1 places ~~31~~40% of growth in places where people report poorer physical health and Alternative 3 the most at ~~34~~46%. All alternatives also place between ~~23~~ 21 and ~~27~~23% of growth in areas with high social vulnerability, with Alternative 1 at ~~23~~21%, Alternative 2 at 22%, and Alternative 3 and the Preferred Alternative at 22~~7~~%.

NOTE: *See Chapter 3.8 for context for the revised numbers above.*

What is different between the alternatives?

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

General Public Services

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

South as well. The Preferred Alternative would be a blend of the growth strategies in Alternative 2 and 3. These areas would therefore see greater demand for public services.

Schools

- Under Alternatives 2 and 3 and the Preferred Alternative, Spokane School District is expected to add over ~~500~~ 600 more new students than under Alternative 1. In contrast, Alternative 1 would place more growth in the Mead School District, resulting in about 600 more students than Alternatives 2 and 3. ***NOTE:*** *See Chapter 3.8 for context for the revised Spokane School District number.*

What are some solutions or mitigation for impacts?

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

With mitigation, what is the ultimate outcome?

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

1.5.9 Utilities



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

How did we analyze Utilities?

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

Thresholds of significance used in this analysis include:

- Impacts would require major unplanned capital improvements within Avista's power service network.
- Impacts would require major unplanned capital improvements within the City's potable water system.
- Impacts would require major unplanned capital improvements within the City's sewer system.

- Impacts would require major unplanned capital improvements to prevent flooding at frequencies and durations beyond design expectations.

What impacts did we identify?

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

What is different between the alternatives?

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

Energy

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

Water

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

- Alternative 3 concentrates growth in central areas of the city, which is a net benefit to a water system, but concentrated growth may require expansion of transmission, production, and storage in the Low, North Hill, Intermediate, High, and Top Pressure zones.
- The Preferred Alternative combines the elements of the other three alternatives and thus is likely to require upgrades to water infrastructure in several locations as noted above.

Sewer

- The difference in sewer usage between single unit and multi-unit connection depends on the density of the development; more dense clusters of single unit and multi-unit developments will see larger flows. While there will be an increase in sewer demand, the City has a plan to address needs as the system expands in Alternative 1 since it aligns with existing planning.
- With growth in Alternative 2 increasing along the Northwest Blvd, Francis Ave, and Wellesley Ave corridors, as well as in the West Plains, this could result in the need to expand capacity at the Francis, Cannon, and Clarke Ave pump stations as well as the Latah Creek Siphon. Additionally, sewer trunk line capacity should be reviewed to confirm there is adequate capacity.
- With growth in Alternative 3 increasing downtown, as well as in the West Plains, this could require improvements to the Post Street Bridge Trunk Line and Clarke Ave pump station, as well as the Latah Creek Siphon. Additionally, sewer trunk line capacity should be reviewed to confirm there is adequate capacity.
- The Preferred Alternative combines the effects of the other three alternatives and thus is likely to require upgrades to sewer infrastructure in several locations as noted above.
- The Preferred Alternative combines the features of the other three alternatives and thus is likely to require upgrades to sewer infrastructure in several locations as noted above.

Stormwater

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

What are some solutions or mitigation for impacts?

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

With mitigation, what is the ultimate outcome?

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

1.5.10 Growth Capacity Comparisons – No Action and Preferred Alternatives

NOTE: *This analysis was added with the Final EIS.*

The 20-year housing and population targets are based on allocations of growth under the State OFM's medium (most likely) forecast. The City of Spokane's share of the most likely growth forecast is 22,359 for the period 2020-2046, adjusted to 21,738 for the 2022-2046 period, which is a focus in this EIS. (Planning Technical Advisory Committee, 2025)

Under maximum development scenarios housing capacity is greater than 20-year housing growth targets under the No Action Alternative (39% capacity above target) and Preferred Alternative (63% of capacity above targets.

Due to the Preferred Alternative changes in the Future Land Use Map, the capacity for housing in the city would increase by 17% on about 6% (284 acres) of the buildable land (over 4,500 acres across the city), mostly along frequent transit corridors and in urbanized areas. The added capacity for low-rise

multi-unit densities addresses the 0-80% AMI deficit under the No Action Alternative. This EIS compares the No Action and Preferred Alternative buildable capacity information in **Chapter 3** to provide a conservative analysis.

2 Proposal and Alternatives



2.1 Introduction

2.1.1 Overview of the Proposal

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

What you will find in this chapter

Chapter 2 Proposal and Alternatives:

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

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

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

2.1.2 Alternatives

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

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

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

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

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

▶ **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, and provides additional education/health jobs in the city center and University Area. It concentrates new industrial jobs in public development authorities in West Plains and Northeast Spokane.
- Like Alternative 2, the Preferred Alternative designates mixed use and housing growth along bus rapid transit lines and corridors that have frequent transit. Corridors would have a range of businesses, housing densities, and livability/streetscape improvements. Several corridors improve connections between major hubs like Downtown and other job hubs in West Plains and Hillyard.
- 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, set for the period 2022-2026, and is in the range of Alternatives 2 and 3.
- Like Alternatives 2 and 3, the Preferred Alternative simplifies the land use plan so that there are fewer land use designations, which are then implemented by multiple zones. The simplified land use plan reflects the areas of focus for new mixed use and low and mid-rise residential and other land use initiatives.
- Like Alternatives 2 and 3, the Preferred Alternative facilitates growth through an infill exemption (RCW 43.21c.229) along frequent transit routes, particularly bus rapid transit. The City may also raise SEPA thresholds citywide (WAC 197-11-800) or in targeted areas in the city.
- Like Alternatives 2 and 3, the Preferred Alternative includes new climate adaptation and mitigation goals and policies per HB 1181 integrated throughout the Comprehensive Plan elements. The Preferred Alternative also updates critical areas regulations.
- The Preferred Alternative Comprehensive Plan periodic update will be implemented by BUILDSpokane municipal code amendments that ensures that housing types and densities fulfill HB 1220 requirements. Additional changes would streamline and simplify the code, while also adjusting standards where appropriate for environmental quality and climate resilience such as tree canopy and landscape standards.

Exhibit 2.1-1. Employment Growth and Alternatives

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

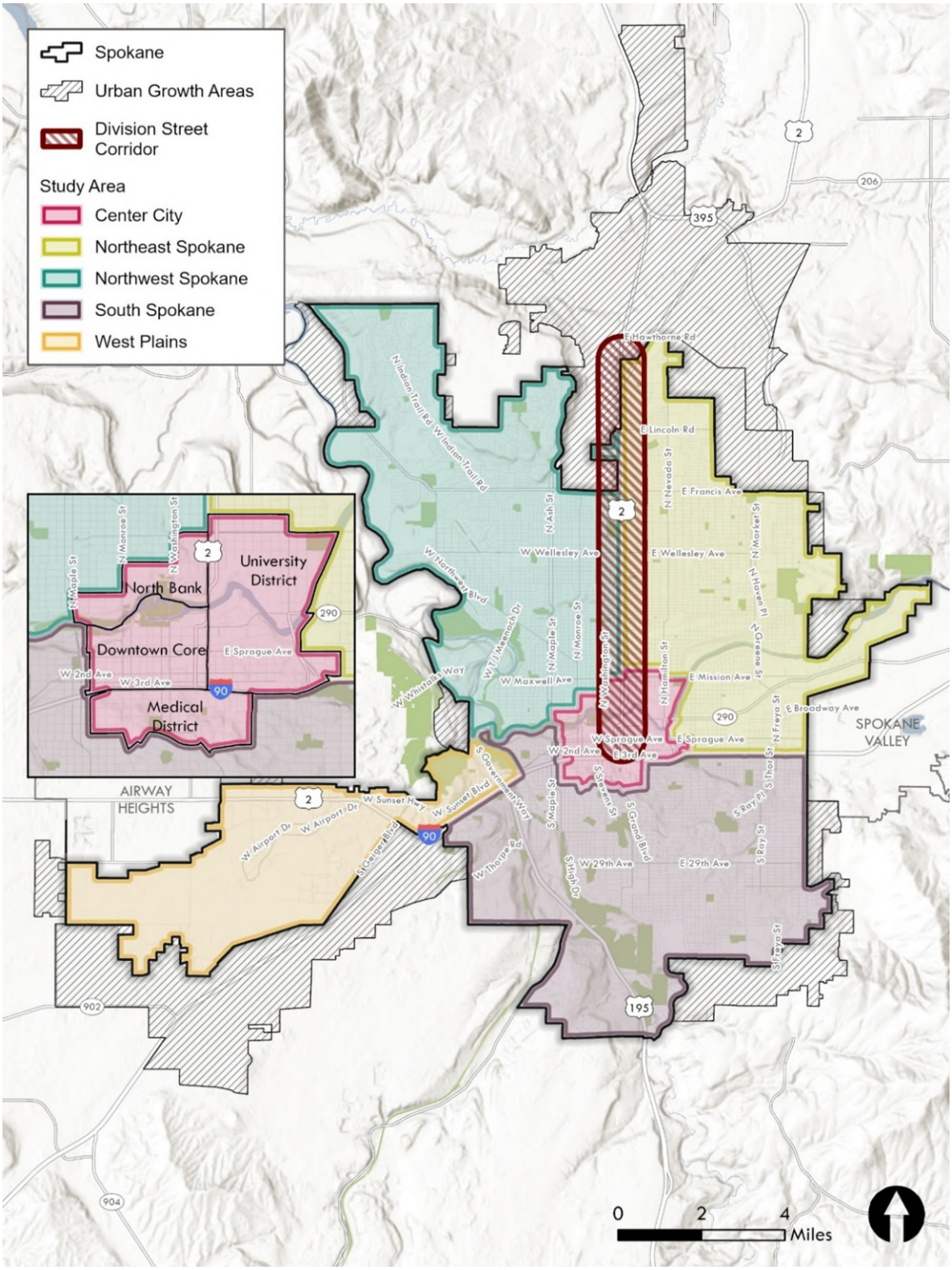
2.1.3 Study Area

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

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

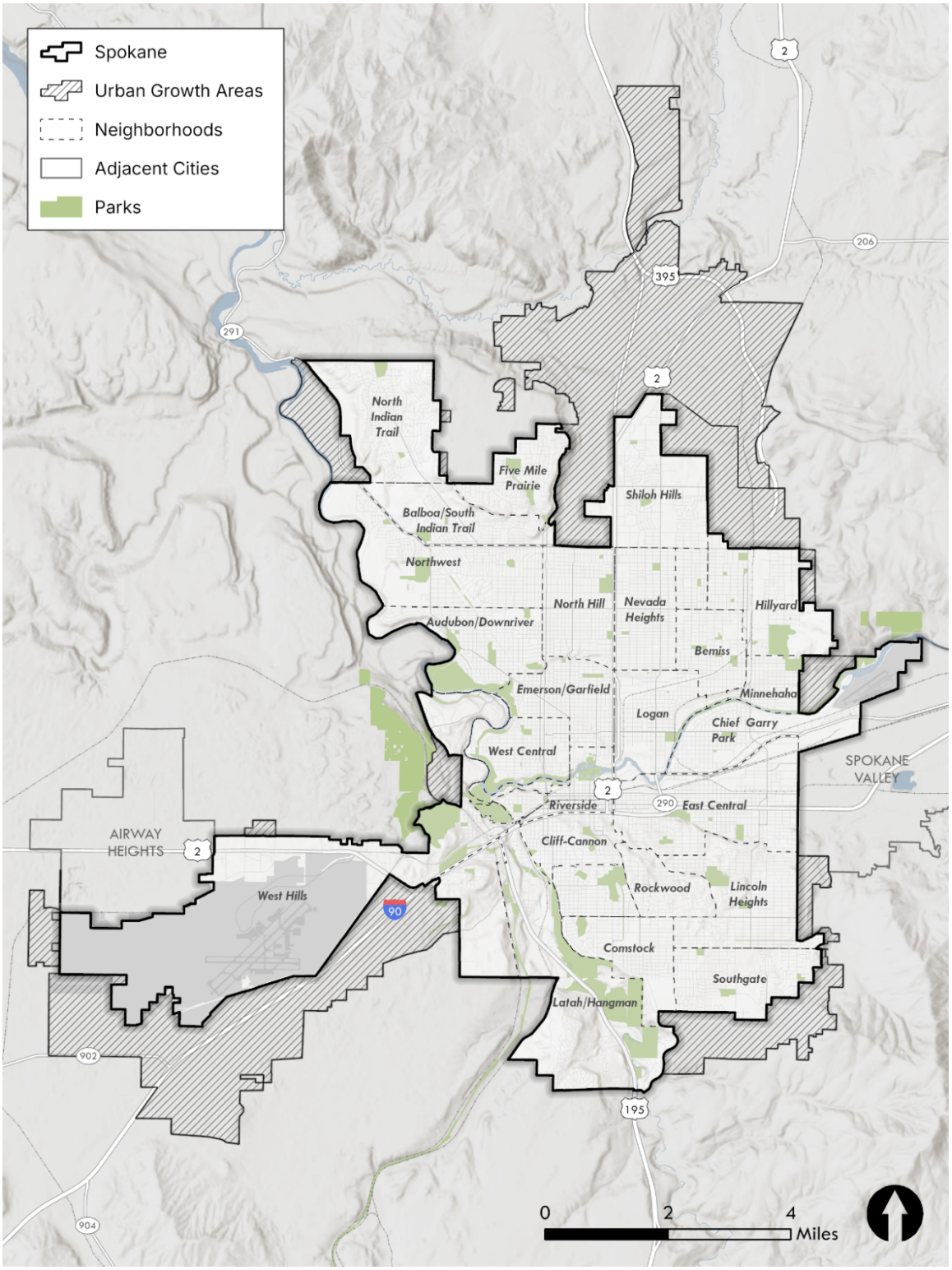
Within these broad subareas the EIS cites Neighborhood Council boundaries. See **Exhibit 2.1-3**.

Exhibit 2.1-2. Spokane Study Areas



Sources: City of Spokane, BERK, 2025.

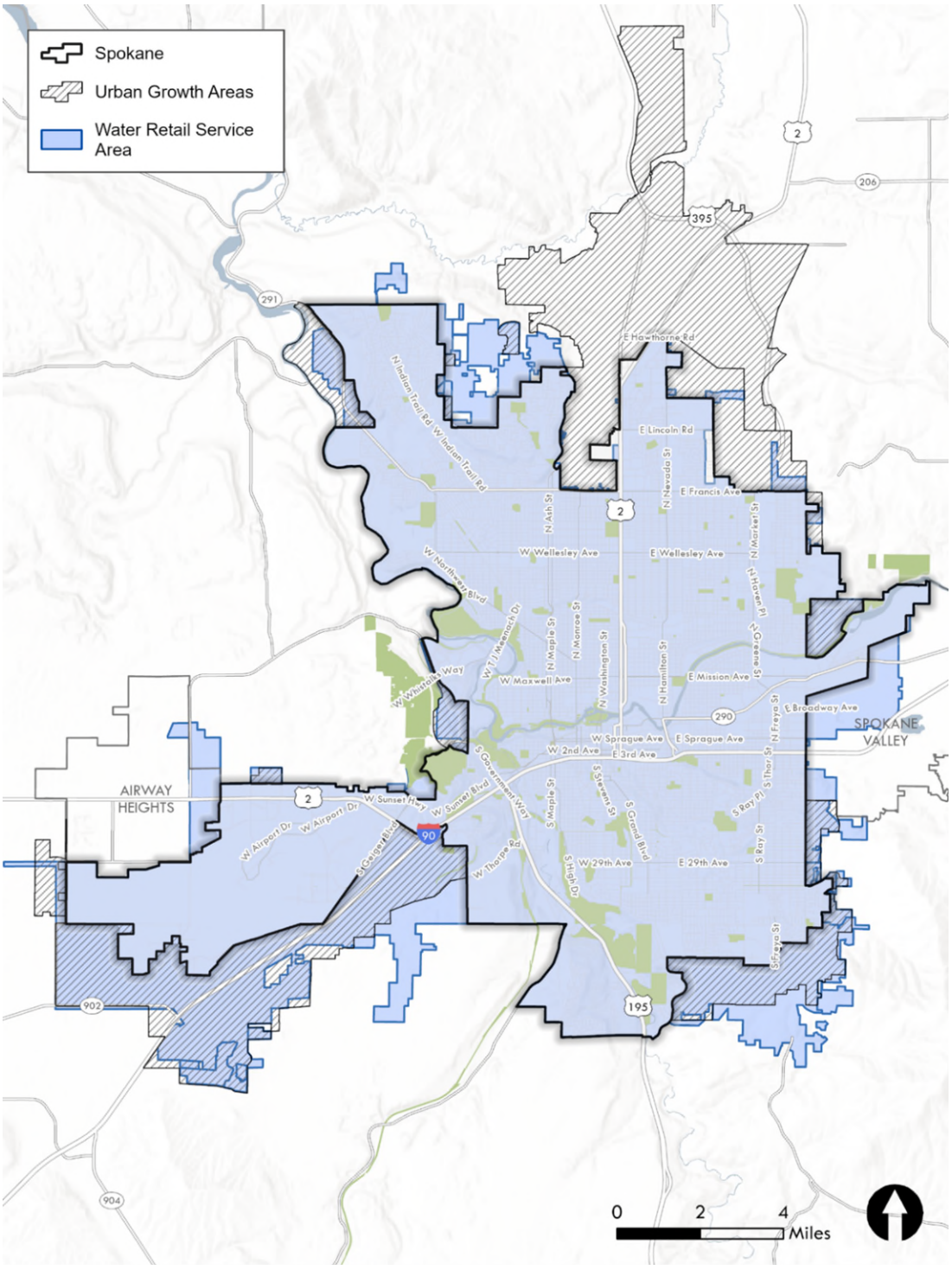
Exhibit 2.1-3. City of Spokane Neighborhoods



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

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

Exhibit 2.1-4. Existing Water Retail Service Areas



Source: City of Spokane, 2025.

2.1.4 Objectives of the Proposal

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

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

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

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

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

2.2 Planning Context

2.2.1 Growth Management Act

State Periodic Update Requirements

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

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

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

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

Transit-Oriented Development

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

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

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

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

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

2.2.2 Comprehensive and Subarea Planning

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

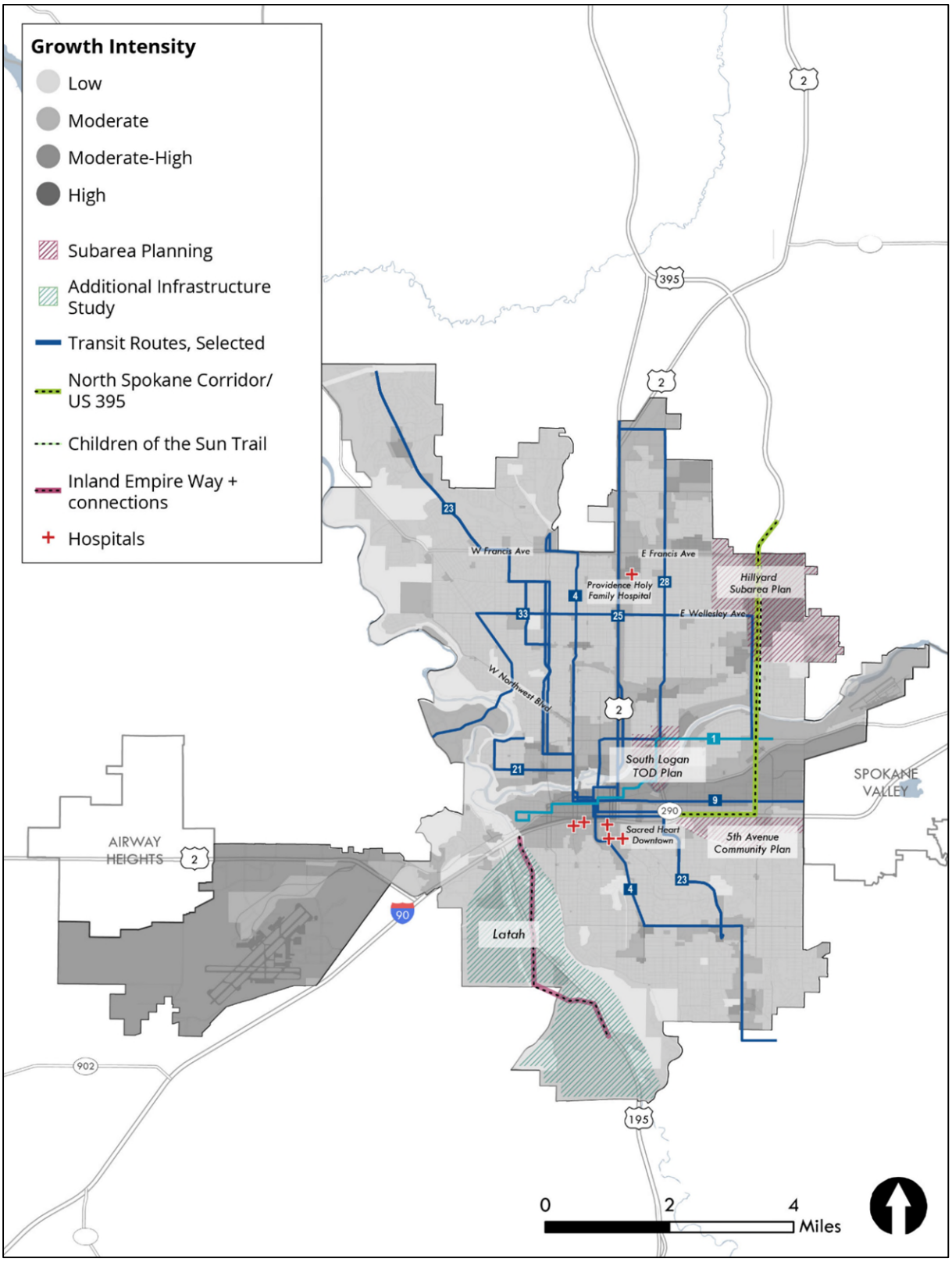
Center City, in the University District, South Logan TOD Plan: The South Logan Transit Oriented Development (TOD) Plan and Final Environmental Impact Statement (EIS) were adopted on January 29, 2023, with land use and zoning amendments and development regulation updates consistent with the Plan adopted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

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

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

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

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



Sources: City of Spokane, BERK, 2025.

2.2.3 Growth Targets and Alternatives

Housing Element Requirements

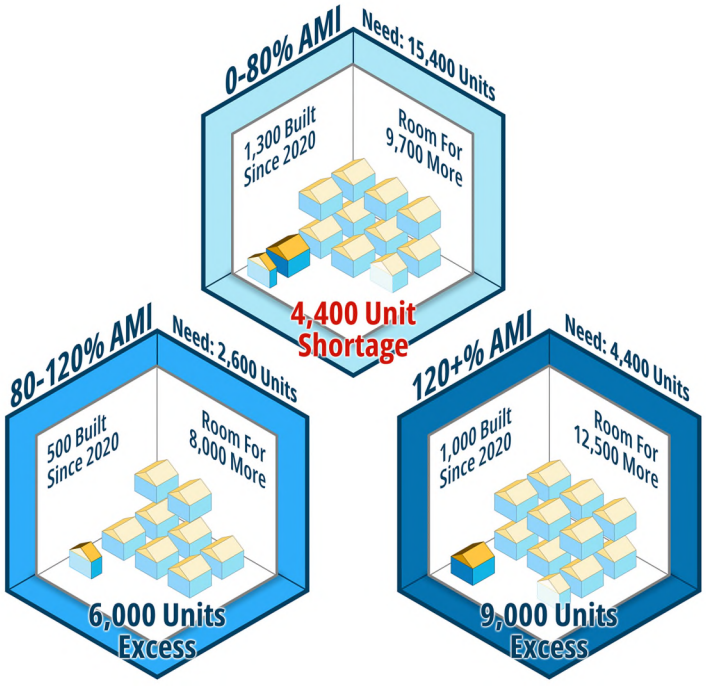
The GMA was amended to strengthen planning for housing that meets the needs of all households, provides a variety of housing types, and removes barriers to adequate housing, particularly by undoing racially disparate impacts caused by past plans or codes. Key components of a Housing Element include:

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

Land Capacity and Housing Targets

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

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



Source: City of Spokane, 2024.

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

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

Affordability Analysis	0-80% AMI	80-120% AMI	120+% AMI	Total
LCA capacity*	9,654	8,036	12,475	30,165
Need (HAPT) 2020-2046**	15,347	2,588	4,424	22,359
~~2021~~2020-2022 Completes***	216	116	290	621
~~2021~~2020-2024 Completes***	1,328	507	978	2,813
2020-2026 Completes****	4,425	906	1,247	6,578
Remaining target during EIS evaluation period 2022-2046	*-5,477*	*5,564*	*8,341*	*21,738*
Remaining affordable target need 2025-2046	*-4,365*	*5,955*	*9,029*	*19,546*
Remaining affordable target need 2027-2046	*-1,268*	*6,354*	*9,298*	*15,781*

Notes: * LCA – Land Capacity Analysis **HAPT – Housing for All Planning Tool |
*** Completes are based on the data available in the City of Spokane's June 2025 Report, Accommodating Affordable Housing. (City of Spokane, June 2025) As data is improved and evaluated, there may have been more housing completions than reported which show progress in meeting the City's housing target.
****Completes are updated for the period January 1, 2020 to July 31, 2026.
Sources: SRTC, 2024;, (City of Spokane, June 2025); BERK 2025.

Middle housing types like townhomes, duplexes, and courtyard apartments, as well as accessory dwelling units, are allowed in all zones that allow residential uses, including in the existing Residential Low land use designation and R1/R2 implementing zones. These smaller housing types often support households with incomes at 80-120% AMI incomes, defined as $72,601 to $90,720 annually as of 2025. Accessory dwelling units have been allowed for some time in the city and there has been a trend of interest in those units captured in the 2025 Land Capacity evaluation. The City adopted middle housing allowances that became effective in early 2024. The City's 2025 Land Capacity evaluation found it was soon to see a trend but recently in 2026 the City is seeing more signs of interest, which could mean added future capacity for those housing types at 80-120% AMI incomes. This would apply

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

to all alternatives since middle housing is allowed under No Action Alternative and would continue to be encouraged by the action alternatives.

Typically, multi-unit housing at low-rise (up to three stories) and mid-rise scales (up to six stories) provide housing units affordable to households with incomes at 0-80% of AMI (up to $72,600 income annually as of 2025). Low-rise and mid-rise multi-unit dwellings are at higher densities than middle housing densities. The action alternatives include areas of Moderate Density Housing and High Density Housing, as well as Mixed-Uses that can provide low- and mid-rise housing at higher densities, to a greater extent than Alternative 1. See dwelling types in **Exhibit 2.2-4**.

Exhibit 2.2-4. Residential Typologies



Single Family with ADU



Six Plex (S Grand Blvd.)



Lowrise Apt (605 S Grand)



Box Car, Univ. District

Low Density Housing	Moderate Density Housing	High Density Housing

Sources: City of Spokane, BERK, 2025.

The Preferred Alternative includes Future Land Use Plan changes that are evaluated for potential increased capacity in multi-unit housing types affordable to those earning 0-80% AMI where there is currently a deficit per **Exhibit 2.2-3**, applying assumptions like those in the 2025 Land Capacity Analysis within potential land use change areas.

Racially Disparate Impacts and Potential for Displacement

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

- There is a persistent gap in homeownership rates for Black, Indigenous, and People of Color (BIPOC) households compared to White households.
- Exclusionary zoning enacted by the City of Spokane reinforced the impacts of redlining and racially restrictive covenants, wherein redlined areas historically had a lower percentage of single unit zoning in residential areas which had a segregating effect on BIPOC households and lower income households.

- Neighborhood access, income disparities, and housing affordability vary by race, putting homeownership farther out of reach for BIPOC households, who have limited access to neighborhoods and higher performing schools.
- Environmental health disparities reflect systemic disparities of historic disinvestment, exasperating disparate outcomes for overburdened communities, including higher levels of exposure to environmental hazards and lower life expectancy.
- Patterns of historic segregation are reflected in the present-day concentration of BIPOC households and uneven distribution of racial groups among neighborhoods within Spokane.
- Access to employment areas varies, with areas closer to downtown having better access to jobs, suggesting there is not an exclusion to jobs proximity.
- While Spokane has grown consistently over the last decade, the growth has not been spread equally across the city, with both areas of increasing integration and areas experiencing displacement.
- In Spokane, households at both ends of the income spectrum have fewer rental units available for their income level.
- Housing patterns and policies concentrate multi-family subsidized housing primarily into Central Spokane and Northeast Spokane, which limits access and choice for low-income households, excluding them from large parts of the city.
- Higher displacement risk exists in Central (Center City) and Northeast Spokane, areas that have higher proportions of BIPOC and lower income households, with higher eviction and demolition rates and changing market factors for redevelopment. (City of Spokane, 2025)

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

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

Adequate Provisions for Needs and Removal of Barriers

With the development of its evaluation of land capacity, affordable housing targets, and racially disparate impacts, the City is considering changes to its development regulations to remove barriers to the provision of housing at all income levels particularly housing at 0-80% AMI income levels. This ~~will be~~is further developed with the Preferred Alternative in ~~the~~ this Final EIS ~~when~~ having more specific locations for Land Use Plan Map ~~and zoning~~ changes that address the deficit under the No Action Alternative described under **Land Capacity and Housing Targets**. ~~and when t~~The City has

identified adequate provisions to remove barriers to housing at all income levels in the Draft Housing Element and is ~~develops~~ developing its companion required updates to the zoning or development code called BUILDSpokane. See **Section 2.4.5**.

Population, Household Sizes, and Housing Types

Population Targets

Population targets are determined based on State OFM projections determined at a county level and then allocated by the county in consultation with the cities. Spokane County and cities developed targets using the OFM medium (most likely) forecast. The City was allocated a share of net new population growth of about 23% for the period 2023-2046. Added to existing population the City's share of the countywide population would be about 39% whereas in 2023 the City's current population share was 42%. (Steering Committee of Elected Officials, 2024)

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

The population target assumes a rate of growth substantially slower than the city has experienced in recent years (0.9% annually between 2015-2025). The population target is also lower than could be accommodated by the number of new housing units allocated by the county. Therefore, for a more conservative analysis of public service needs, **this EIS considers a population growth range of 25,157 to 50,650** based on the exact population growth target at the low end (2022-46) and multiplying the current household size of 2.33 by the 21,738 housing target (2022-46) at the upper end.

Household Sizes and Types

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

Exhibit 2.2-5. Persons per Household

Unit Type	Housing Units (2022)	Persons Per Household (2022)
Occupied Housing Units, All Types	95,604	2.33
Occupied Frame Housing*	94,053	2.34

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

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

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

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

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

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

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

	NET	TOTAL	PERCENTAGE
Existing Single Unit (2022)	-	65,989*	0.65
Existing Multi Unit (2022)	-	35,786*	0.35

	NET	TOTAL	PERCENTAGE
Alternative 1 Single Unit	11,942	77,931	0.63
Alternative 1 Multi Unit	9,796	45,581	0.37
Alternative 2 Single Unit	6,456	72,445	0.59
Alternative 2 Multi Unit	15,282	51,068	0.41
Alternative 3 Single Unit	6,450	72,439	0.59
Alternative 3 Multi Unit	15,288	51,074	0.41
Preferred Alternative Single Unit	6,401	72,390	0.59
Preferred Alternative Multi Unit	15,337	51,122	0.41

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

Jobs

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

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

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

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

in the planning period. Alternative 3 studies a moderately higher projection above Alternative 1 of nearly 39,000 jobs.

Exhibit 2.2-7. Employment Projections

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

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

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

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

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

Moderate-High Projection. Considers a growth rate of 1.15% above the SRTC Projection ~~of 1.15%~~. It is slightly lower than the highest employment growth rate of 1.2% generated from projections provided by Spokane Workforce Council and developed by Lightcast, a private provider of data.

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

All alternatives allow a range of commercial uses. Action alternatives provide more opportunities for neighborhood-serving commercial uses that meet new policies and criteria, and additional areas of mixed-uses. See **Exhibit 2.2-8**. All alternatives promote the highest employment in Downtown as well as Hillyard and around the airport in West Hills. In the southwest and northeast, the employment is primarily light or heavy industrial, while Downtown employment includes offices, research and development, medical, and education. See **Exhibit 2.2-9**.

Exhibit 2.2-8. Commercial Typologies

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

Exhibit 2.2-9. Industrial and Employment Typologies

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

2.2.4 PlanSpokane Policies and Regulation Proposals

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

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

- Modernize City's Development Regulations. Conduct a review of existing land use and development regulations in the Spokane Municipal Code (SMC) to identify outdated provisions, legal deficiencies, inconsistencies, and gaps relative to state law and adopted plans.
- Remove Barriers to Development. Identify barriers to development including but not limited to housing production, infill development, and adaptive reuse.
- Improve Clarity and Usability. Develop a clear, user-friendly, enforceable unified development code and GIS-based zoning map that support Comprehensive Plan goals related to housing, equity, sustainability, economic vitality, and community character.

- Streamline Permitting and Service Delivery. Propose strategies to simplify and expedite development review and permitting processes while ensuring predictable outcomes and consistent application.
- Engage Stakeholders and the Public. Facilitate inclusive engagement with staff, elected officials, stakeholders, and the public to build shared understanding and ownership of the code modernization process and its outcomes.
- Support Implementation and Ongoing Improvement. Provide tools, training, visual aids, and documentation to support implementation, improve transparency, and ensure long-term adaptability through integration with planning, permitting, and technology systems.

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

Examples of initiatives that support the code update purposes include:

- Land Use Implementation/changes to zoning categories: The City is considering reducing the number of land use categories in the Comprehensive Plan land use map and allowing implementing zoning to provide the detail of types of uses and densities.
- Align zoning districts and allowed uses with updated Land Use Plan Map
- Housing code changes to meet state law: This includes reviewing and amending land use and housing regulations to provide housing types that meet all income levels such as sufficient capacity in moderate and high-density housing.
- Implement regulations to address racially disparate impacts and reduce the risk of displacement and exclusion in housing development.
- Mixed Use Zone recommendations including adjustments to centers and corridors: Based on the Spokane Centers and Corridors Study in 2024, changes could include developing mixed-use zones that support the City's goals for amenity-rich, walkable, mixed-use center.
- Update review procedures with focus on efficiency, transparency, and predictability of both process and outcomes. Reorganize content in logical outline, ensure language is plain and comprehensible, include graphics and illustrations.
- Review and revise development standards – design standards in particular – to make sure they are practical and achievable. Ensure applicable standards are proportional to complexity of infill and redevelopment requests Add detail to landscaping and expand tree preservation incentives. Draft citywide outdoor lighting standards.
- Critical Areas Ordinance: The City is also reviewing critical areas regulations to address state rule updates and ensure ongoing protection of the functions and values of wetlands, fish and wildlife habitat, and critical aquifer recharge areas as well as to protect public health and safety in frequently flooded areas and geologically hazardous areas.

Many of these Comprehensive Plan policy or code update concepts have been the subject of community engagement, including in fall 2025. See **Chapter ~~5~~ 6 Appendix A**.

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

2.3 Public Outreach

2.3.1 Visioning and Scoping Period

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

Scoping: Community Engagement

Both before and during the scoping comment period, the City of Spokane Department of Planning and Economic Development provided opportunities for the community to be engaged in the process of identifying the future vision for Spokane's next twenty years. See **Chapter ~~5~~ 6 Appendix A.**

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

Over 300 people participated and shared ideas about the future of Spokane and how to plan Spokane through 2046. Key themes included nature, community, innovation, and livability. See **Exhibit 2.3-1**. These themes are part of Proposal Objectives in **Section 2.1.4 Objectives of the Proposal**.

Exhibit 2.3-1. Engagement Themes



Source: City of Spokane, 2025.

Scoping: Agency Workshop and Written Comments

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

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

Environmental elements proposed for study in the Comprehensive Plan EIS include those listed below. In addition to standard review, integration of agency comments and study of impacts are emphasized with underlines. Each alternative is evaluated with these topics. The City considers environmental justice and climate resilience as part of studying each topic.

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

Fall 2025: Future Growth and Guiding Policies Workshops

In November 2025, the City held a community workshop series on future growth and guiding policies for initial feedback on different ways the City of Spokane can grow, as well as the goals and policies to guide the growth. See **Chapter ~~5~~ 6 Appendix A.** Over 100 individuals attended one or more of the workshops, providing valuable feedback to help shape the future of the City of Spokane. These in-person workshops included discussion, mapping exercises, and feedback opportunities related to various aspects of the Comprehensive Plan, including the new element of climate and resiliency.

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

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

2025-2026: Draft Plan Chapters

The City developed draft plan chapters with updated goals and policies in conjunction with the Plan Commission as well as the Transportation Commission and Climate Resilience & Sustainability Board at public meetings. The City invited public comment on the draft chapters, most comprehensively in summer and fall 2026.

2.3.2 Draft Comprehensive Plan and Draft EIS Engagement

See the Fact Sheet for ~~ways to~~opportunities the City held to provide written comments during a 60-day written comment period from December 18, 2025 to February 18, 2026, extended to March 5, 2026.

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

2.4 Proposed Action and Alternatives

2.4.1 Alternative Comparison

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

- **Alternative 1 Stay the Course:** This SEPA required Alternative (No Action Alternative) is the continuation of the current Comprehensive Plan and associated zoning and regulations. This alternative meets total housing and total population targets but does not meet affordable housing targets for all income bands. It provides for job growth that is more robust than prior trends.
- **Alternative 2 Distributed and Balanced:** Alternative 2 adds greater housing and job intensity along frequent transit routes and prioritizes a jobs/housing balance. Housing targets at all income levels would be met. To evaluate infrastructure phasing, Alternative 2 is analyzed through a job growth level similar to State Employment Security Department trends. Alternative 2 includes climate planning and supporting multimodal levels of service per HB 1181 and would update critical areas regulations.
- **Alternative 3 Center City and Regional Hubs:** Alternative 3 focuses both jobs and housing growth in regional hubs and connections between them, particularly Center City (connecting regional centers/hubs via I-90 and the North Spokane Corridor (NSC)). Alternative 3 meets housing targets at all income levels. It uses the highest jobs projection and focuses investments in key employment centers, also for the purposes of testing infrastructure needs. Alternative 3 includes climate planning and supporting multimodal levels of service per HB 1181 and would update critical areas regulations.
- **Preferred Alternative:** The Preferred Alternative 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). The Preferred Alternative meets housing targets at all income levels. It provides for job growth that is more robust than prior trends but is equal to Alternative 1 and consistent with the SRTC job projections. It includes climate planning and supporting multimodal levels of service per HB 1181 and would update critical areas regulations. The Preferred Alternative simplifies the Future Land Use Map and ensures that zoning and development regulations address housing types and densities fulfill HB 1220 requirements. Additional changes would streamline and simplify the code, while also adjusting standards where appropriate such as tree canopy and landscape standards.

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

Exhibit 2.4-1. Alternatives Overview

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

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
* Each alternative studies a job projection from a different data source to support infrastructure planning. The different numbers are not based on an alternative's likelihood to produce more or fewer jobs.
Sources: SRTC, 2022; City of Spokane, 2025; BERK, 2025.

2.4.2 Alternative 1: No Action, Stay the Course

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

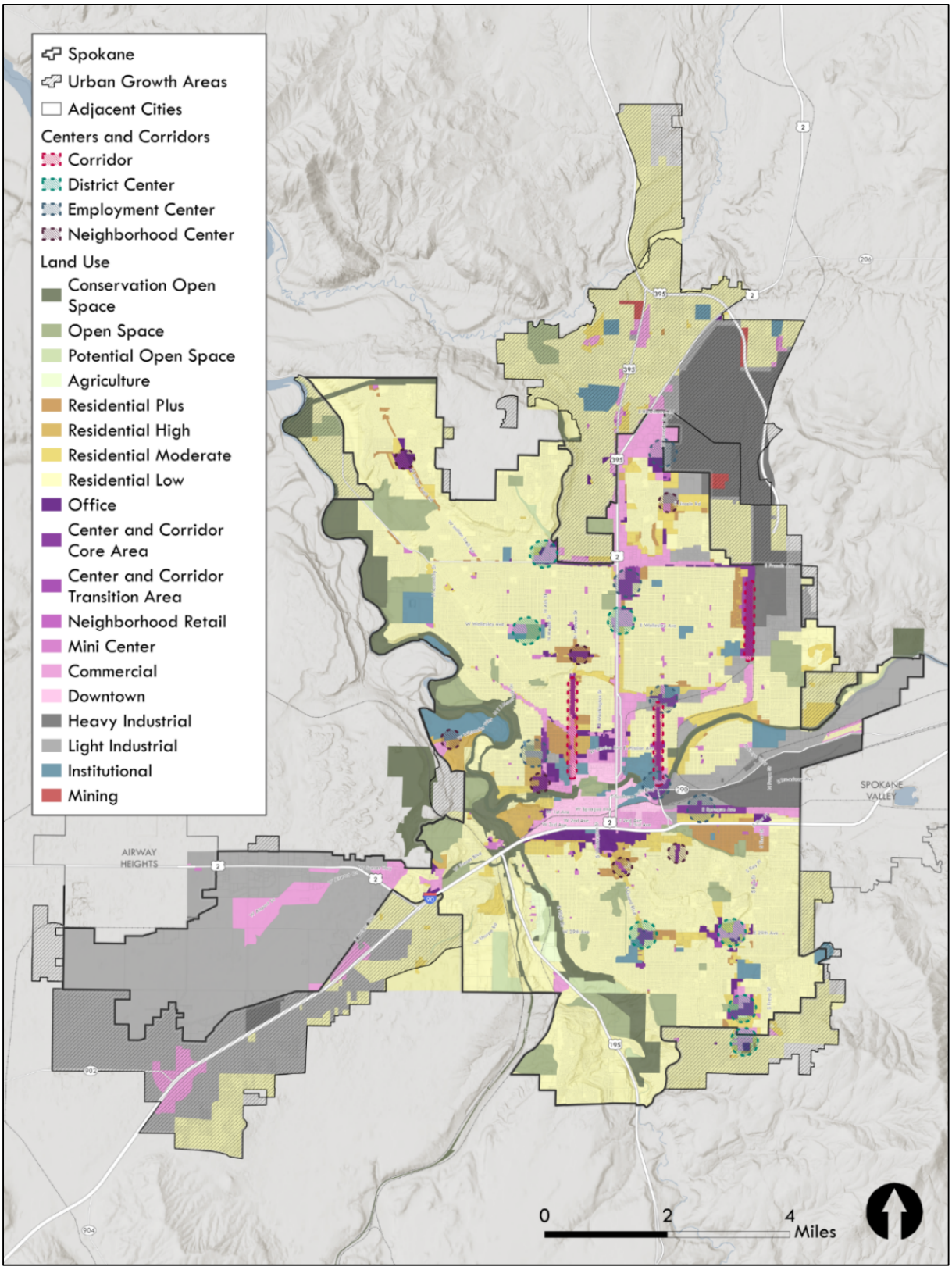
Growth would continue as planned under current rules and is focused on centers and corridors, a growth strategy originally adopted in the early 2000s. See the adopted Land Use Plan in **Exhibit 2.4-2**. Higher intensity housing is found in centers and corridors and Downtown. Middle housing and single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

Alternative 1 meets total housing growth targets but does not provide sufficient capacity for housing at all income levels, particularly those affordable at 0-80% AMI. The distribution of housing is shown in **Exhibit 2.4-4**. Job growth is consistent with regional projections by SRTC. Job growth distribution is shown in **Exhibit 2.4-5**. For the distribution by Transportation Analysis Zone, please see **Chapter ~~5~~ 6 Appendix B.**

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

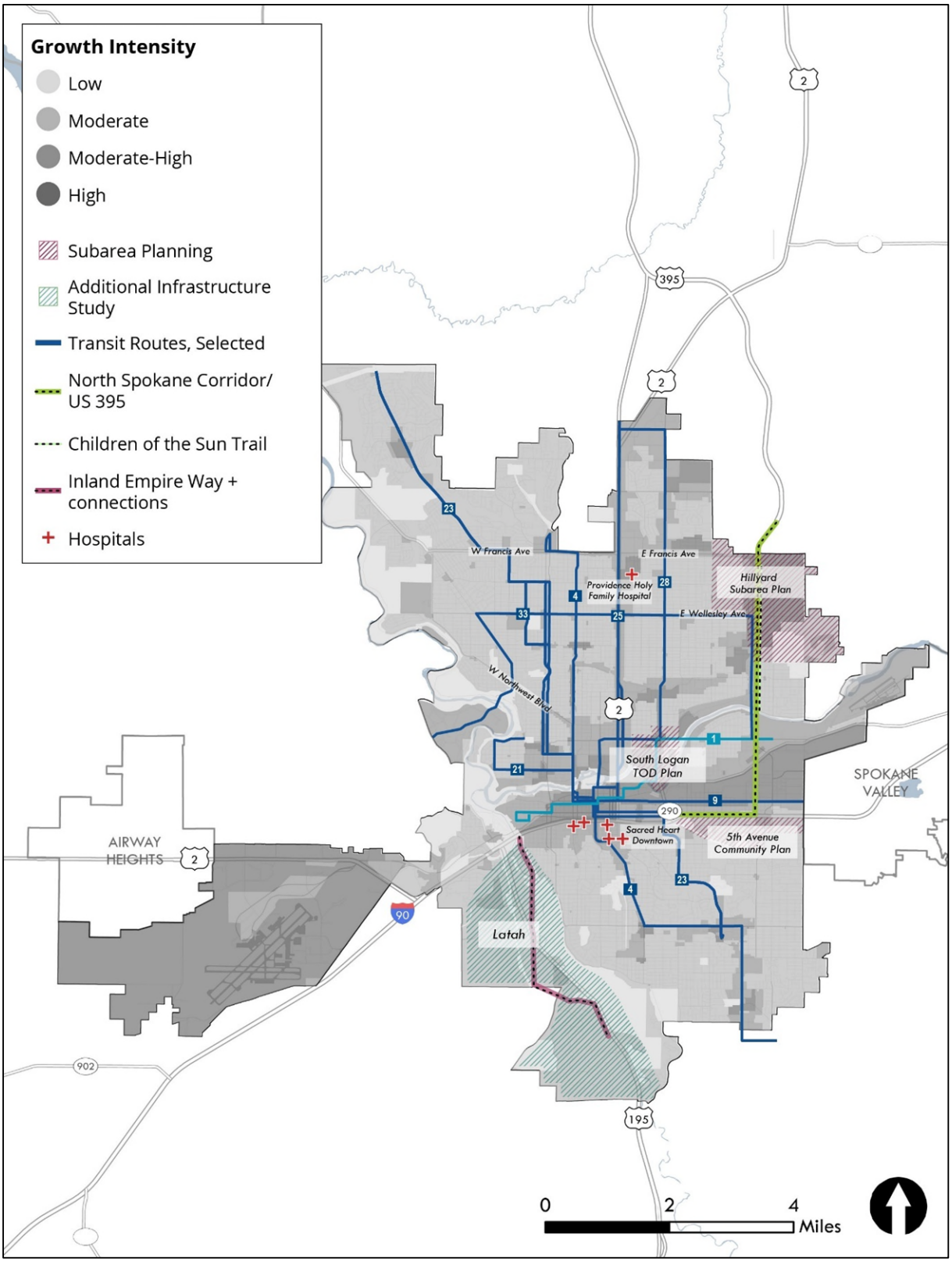
[2] The SRTC model base year is 2022 whereas the subarea plan adoption was in January 2024. Thus, the transportation assumptions for 2022 are lower than the action alternatives that implement the expected growth.

Exhibit 2.4-2. Alternative 1 Stay the Course



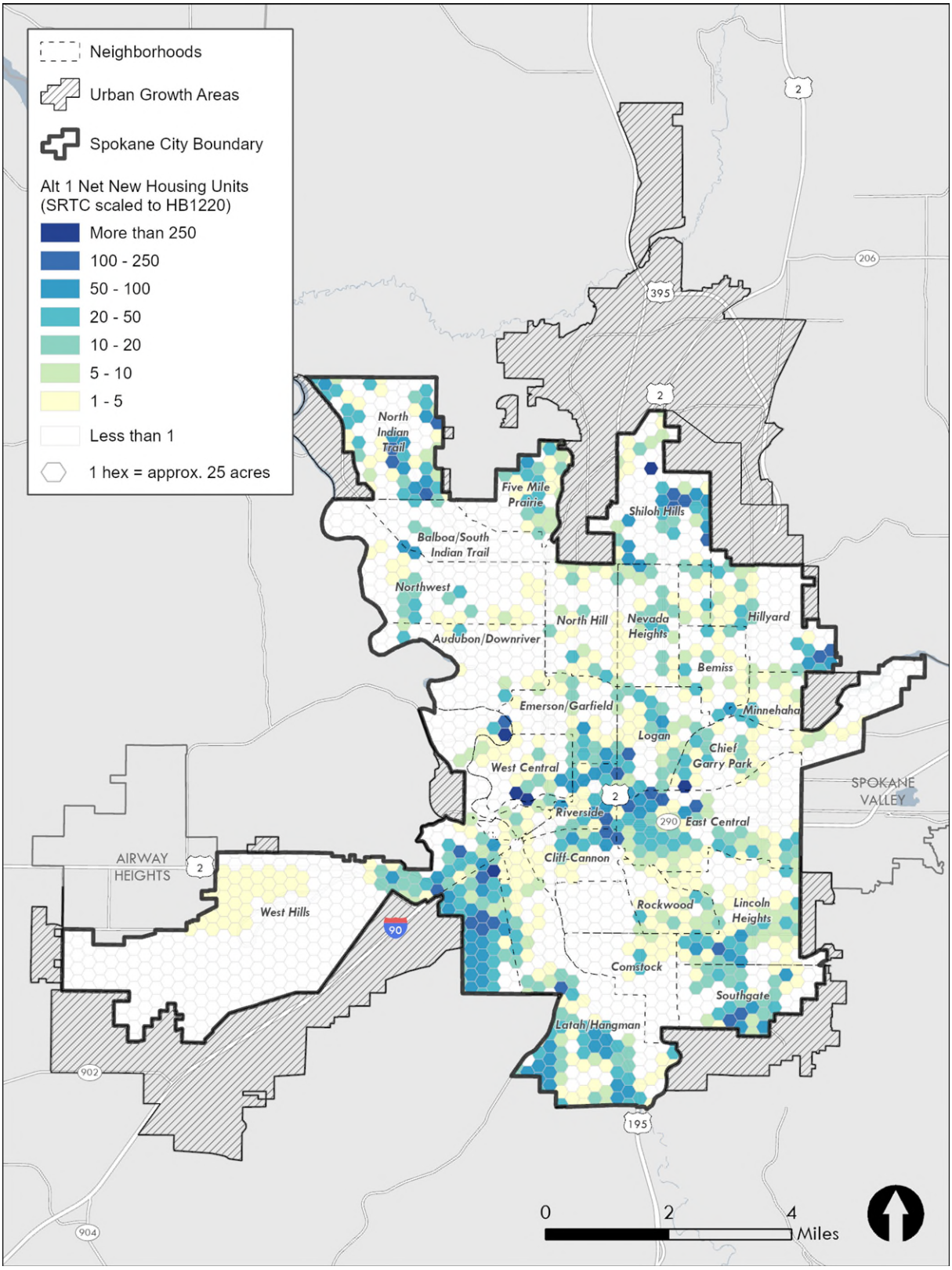
Sources: City of Spokane; BERK Consulting, 2025.

Exhibit 2.4-3. Alternative 1 – Growth Intensity



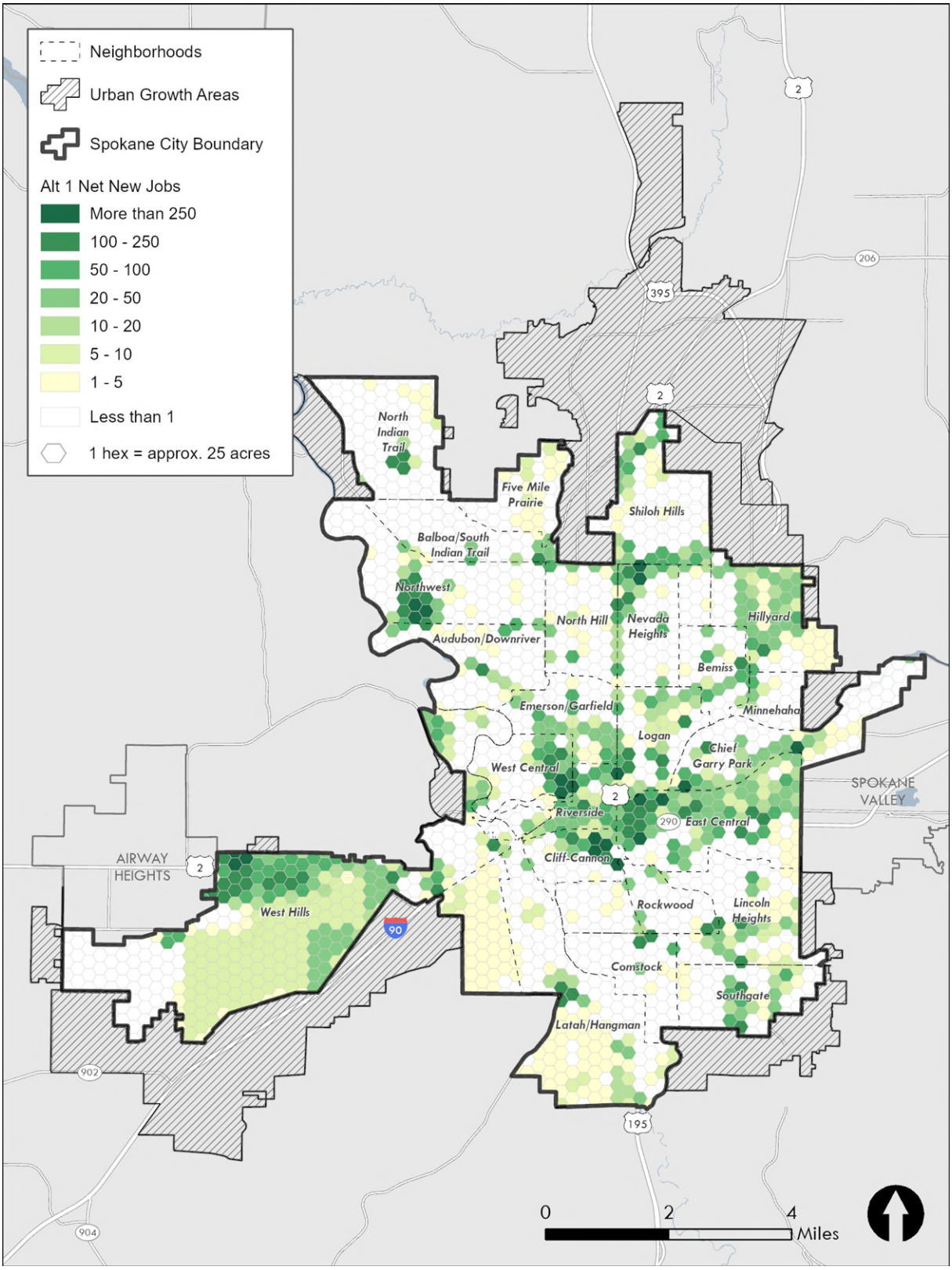
Sources: City of Spokane; BERK Consulting, 2025.

Exhibit 2.4-4. Alternative 1 Housing Growth



Sources: City of Spokane, BERK Consulting, 2025.

Exhibit 2.4-5. Alternative 1 Job Growth



Sources: City of Spokane, BERK Consulting, 2025.

2.4.3 Alternative 2: Distributed and Balanced

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

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

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

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

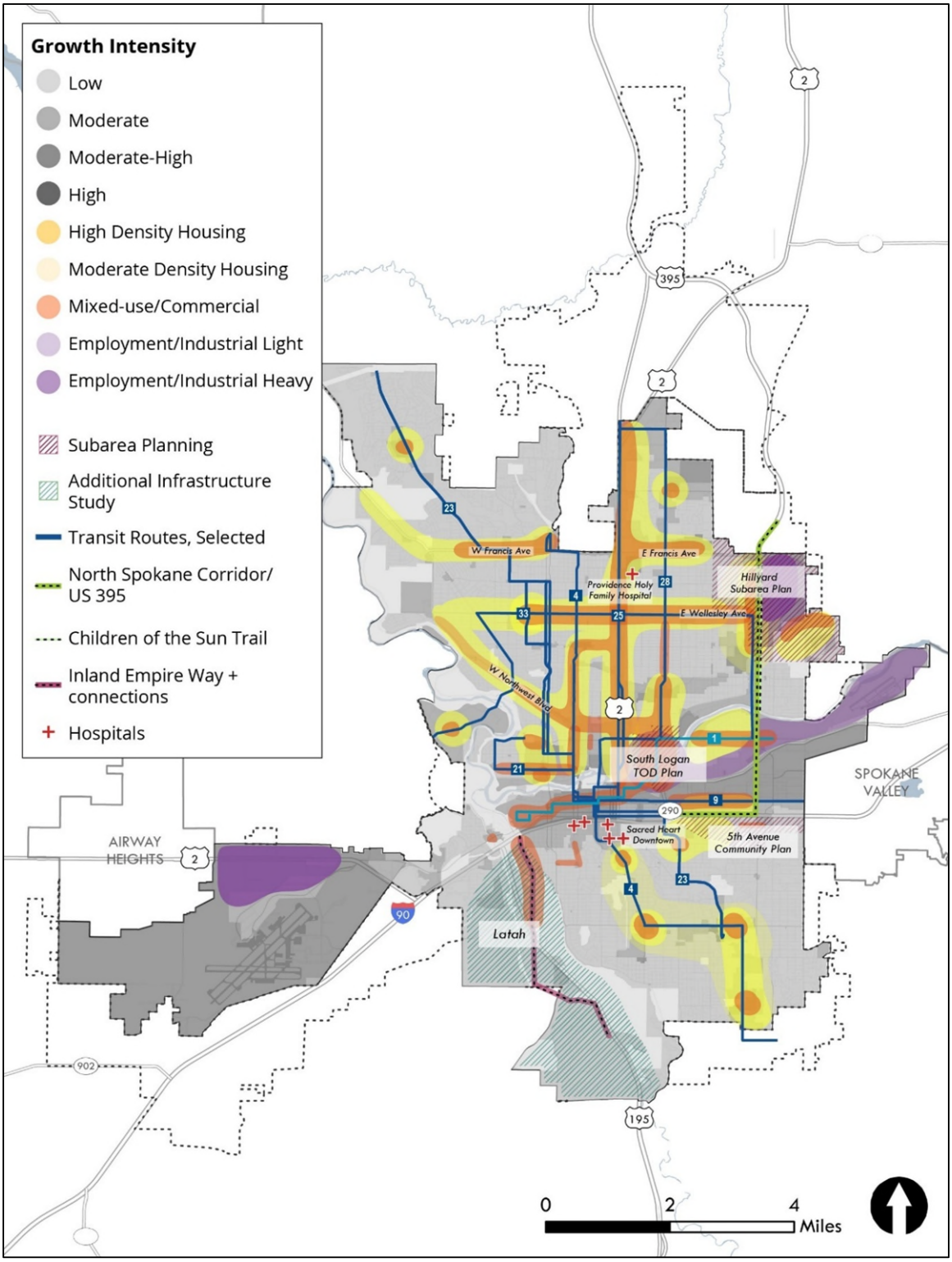
Alternative 2 simplifies the land use plan so that there are fewer land use designations, with each designation implemented by multiple zones. This provides flexibility to respond to changing community needs and market conditions and avoids unnecessary Comprehensive Plan amendments.

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

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

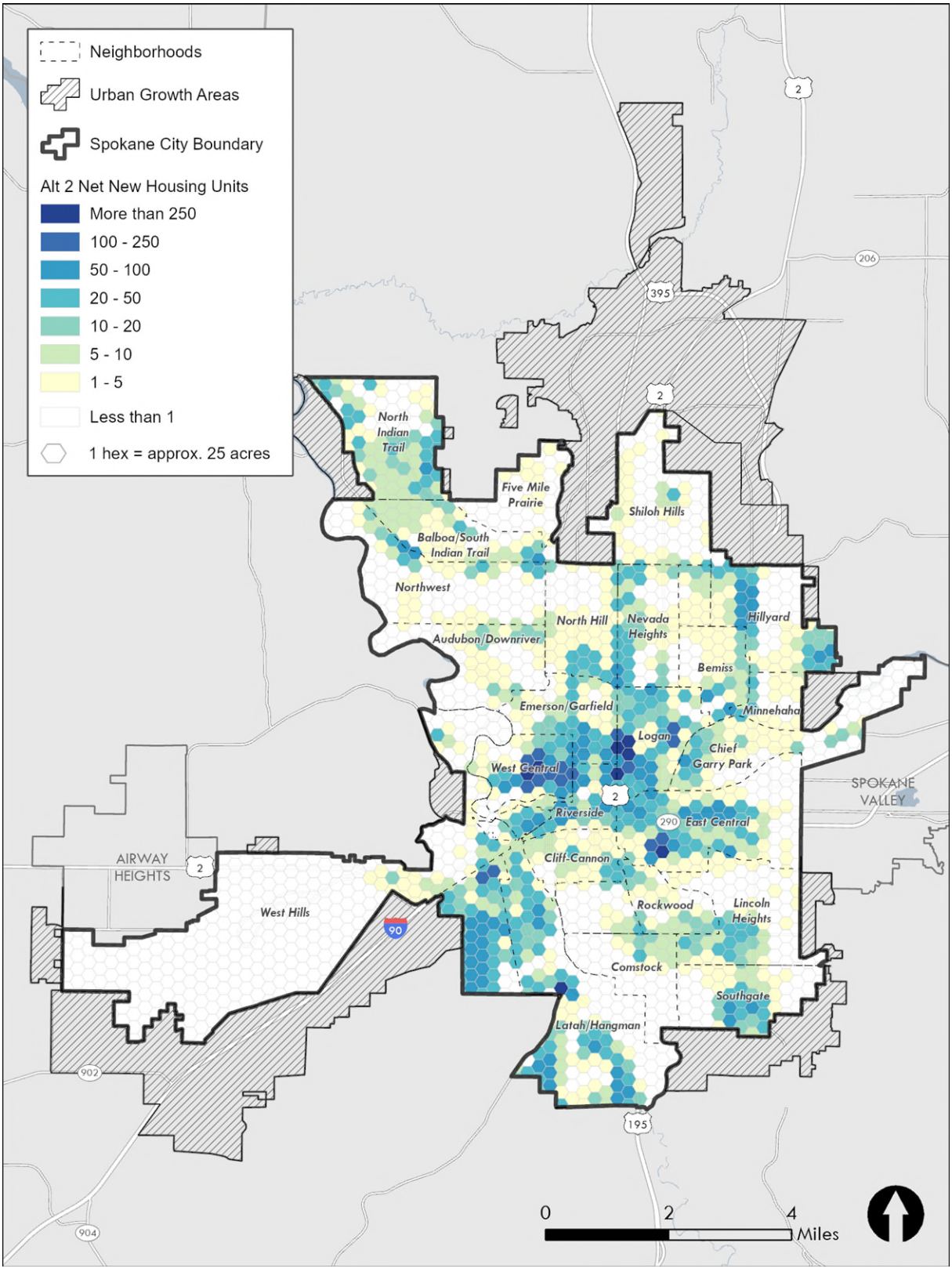
Alternative 2 would facilitate growth through infill exemptions under SEPA (RCW 43.21c.229) where the EIS provides upfront evaluation of growth along frequent transit routes, and documents plans or development regulations that provide mitigation measures. The City may also raise SEPA thresholds citywide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

Exhibit 2.4-6. Alternative 2 Distributed and Balanced



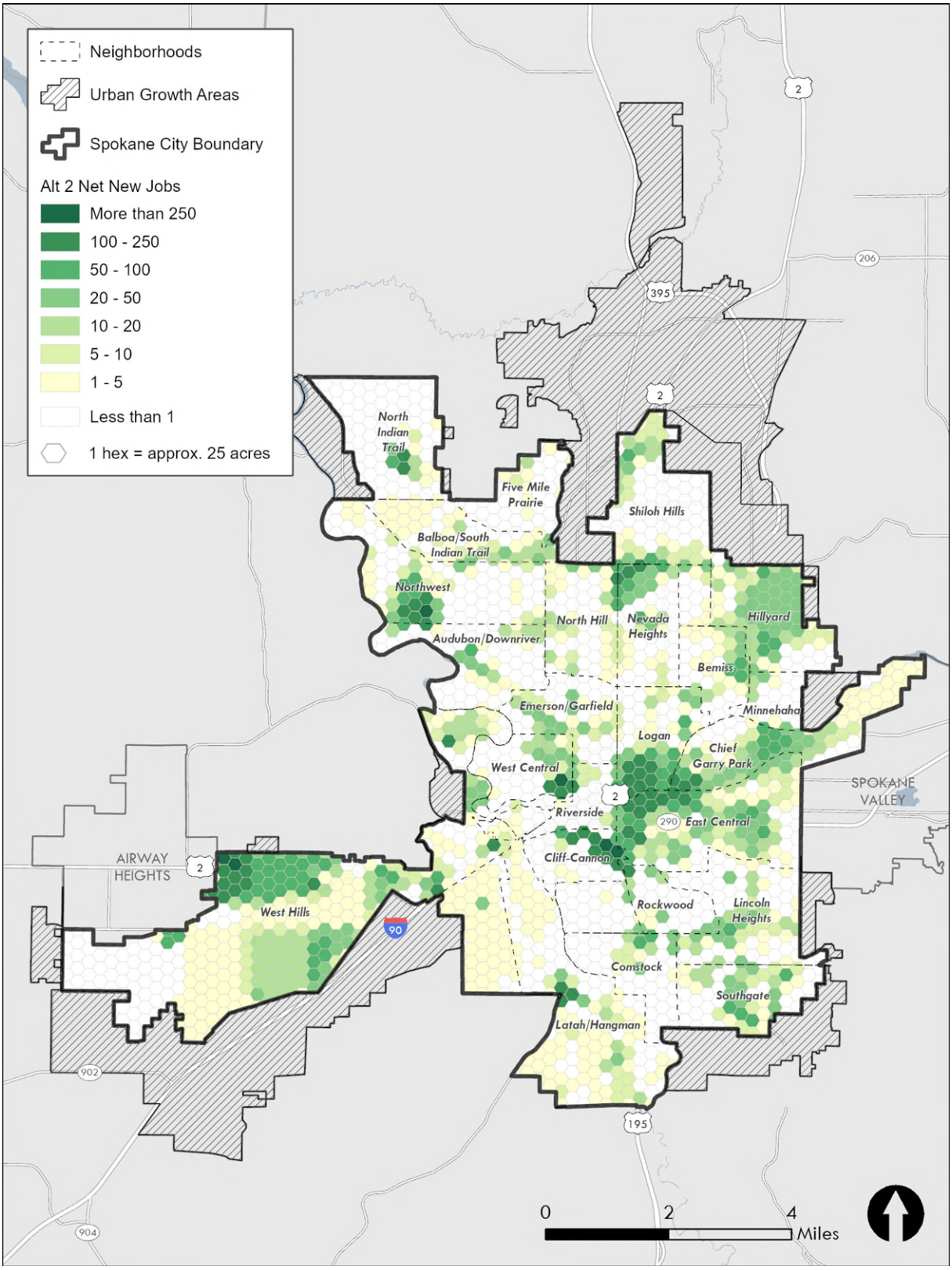
Note: There will be neighborhood-serving commercial opportunities that could locate in residential areas based on criteria that are not geographically identified on the map.
Sources: City of Spokane, BERK Consulting, 2025.

Exhibit 2.4-7. Alternative 2 Housing Growth



Sources: City of Spokane, BERK Consulting, 2025.

Exhibit 2.4-8. Alternative 2 Job Growth



Sources: City of Spokane, BERK Consulting, 2025.

2.4.4 Alternative 3: Center City and Regional Hubs

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

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

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

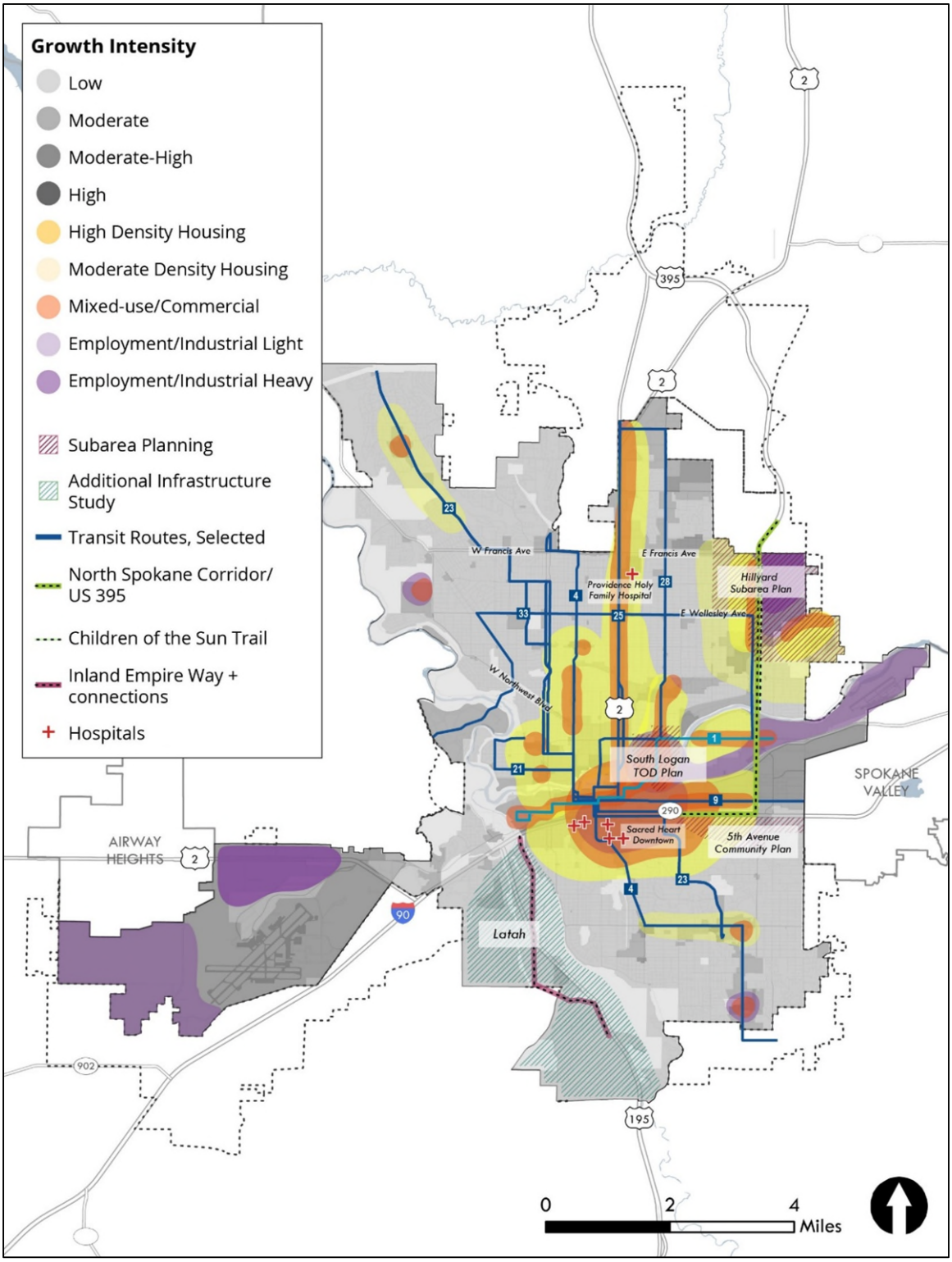
Alternative 1 continues the current plan and code with a recent emphasis on middle housing unit types. Alternative 3 meets housing targets at all income levels and provides a greater range of housing types such as low- and mid-rise housing that is a higher density than middle housing. Housing distribution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

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

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

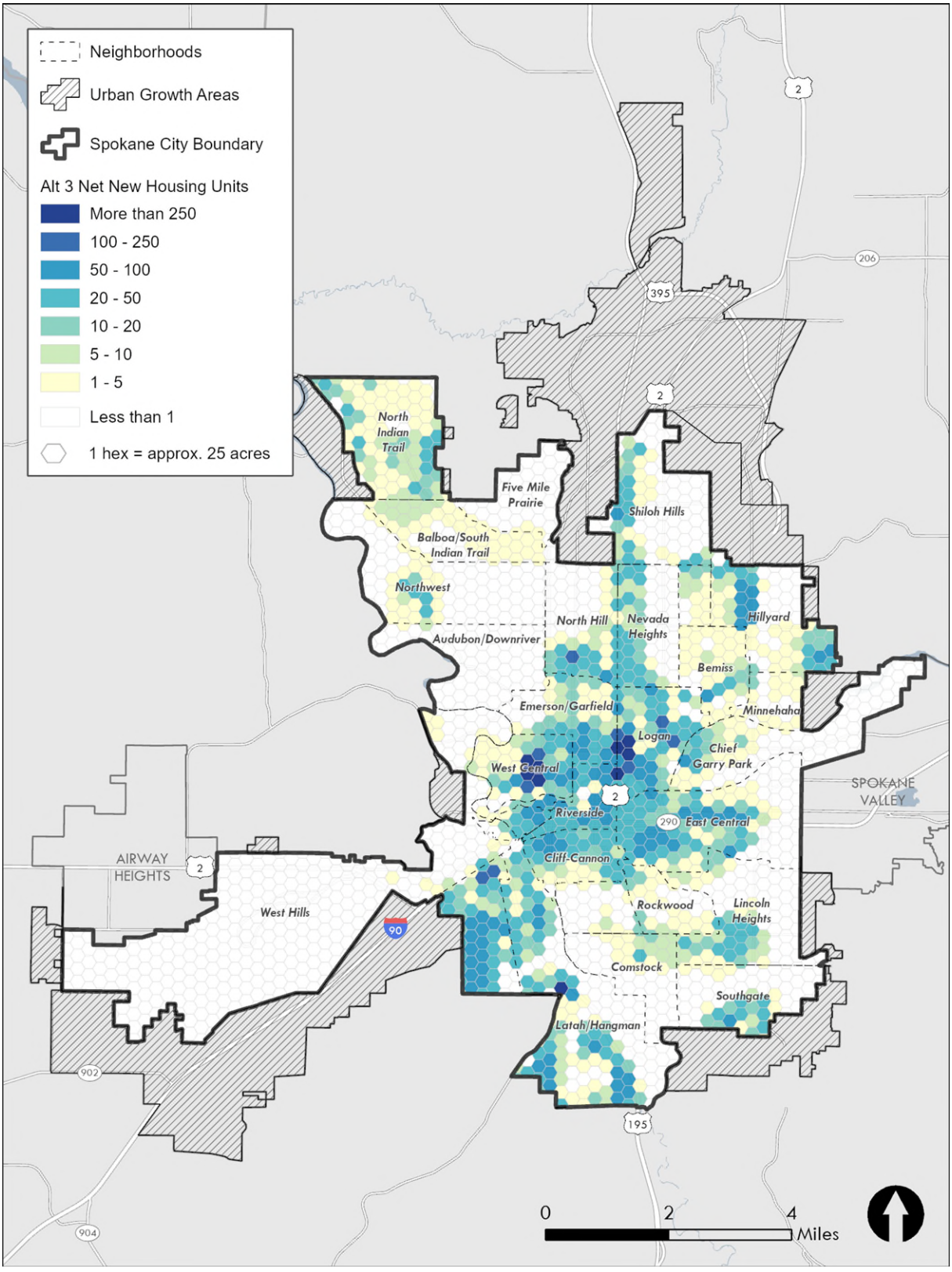
Like Alternative 2, Alternative 3 includes new climate adaptation and mitigation goals and policies per HB 1181 and updates critical areas regulations.

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



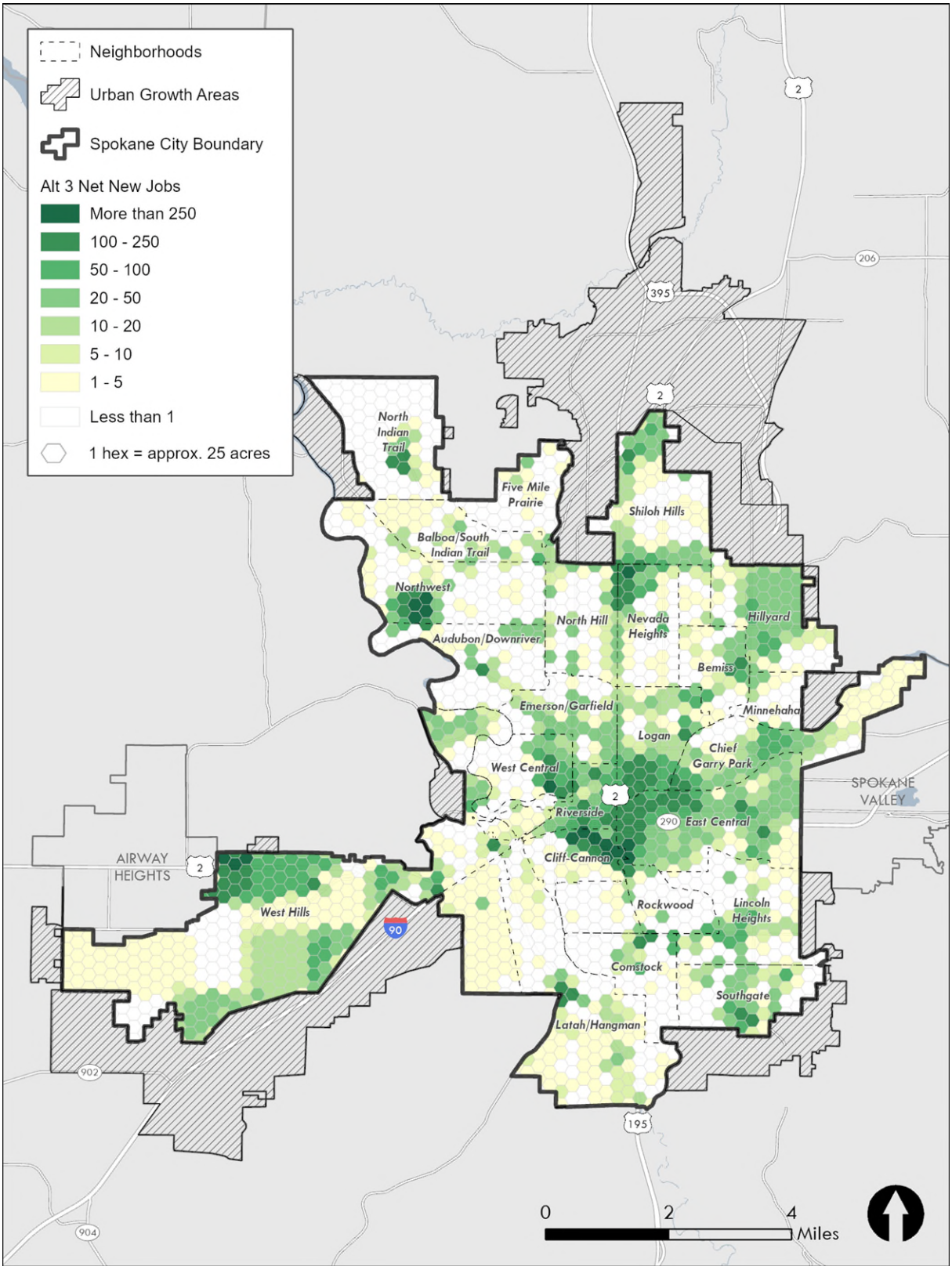
Note: There will be neighborhood-serving commercial opportunities that could locate in residential areas based on criteria that are not geographically identified on the map.
Sources: City of Spokane, BERK Consulting, 2025.

Exhibit 2.4-10. Alternative 3 Housing Growth



Sources: City of Spokane, BERK Consulting, 2025.

Exhibit 2.4-11. Alternative 3 Job Growth



Sources: City of Spokane, BERK Consulting, 2025.

2.4.5 Preferred Alternative

NOTE: *Analysis for the Preferred Alternative was added below with the Final EIS.*

Key Elements of Preferred Alternative

The Preferred Alternative blends features of all Draft EIS studied alternatives. It is based on the Plan Commission and City Council spring 2026 review of the Draft EIS Alternatives and public comment. In May 2026 the City Council approved Resolution 2026-0035, which indicated:

- A combination of the different alternatives as the preferred direction for future growth and investment for the City;
- Growth Intensity illustrating Moderate-High Density Housing, Mixed-use/Commercial, and Employment/Industrial Light and Heavy Locations;
- Potential Intensity Change Area and No Height Limit Boundaries; and
- Use of the Spokane Regional Transportation Council (SRTC) employment forecast to support regional consistency.

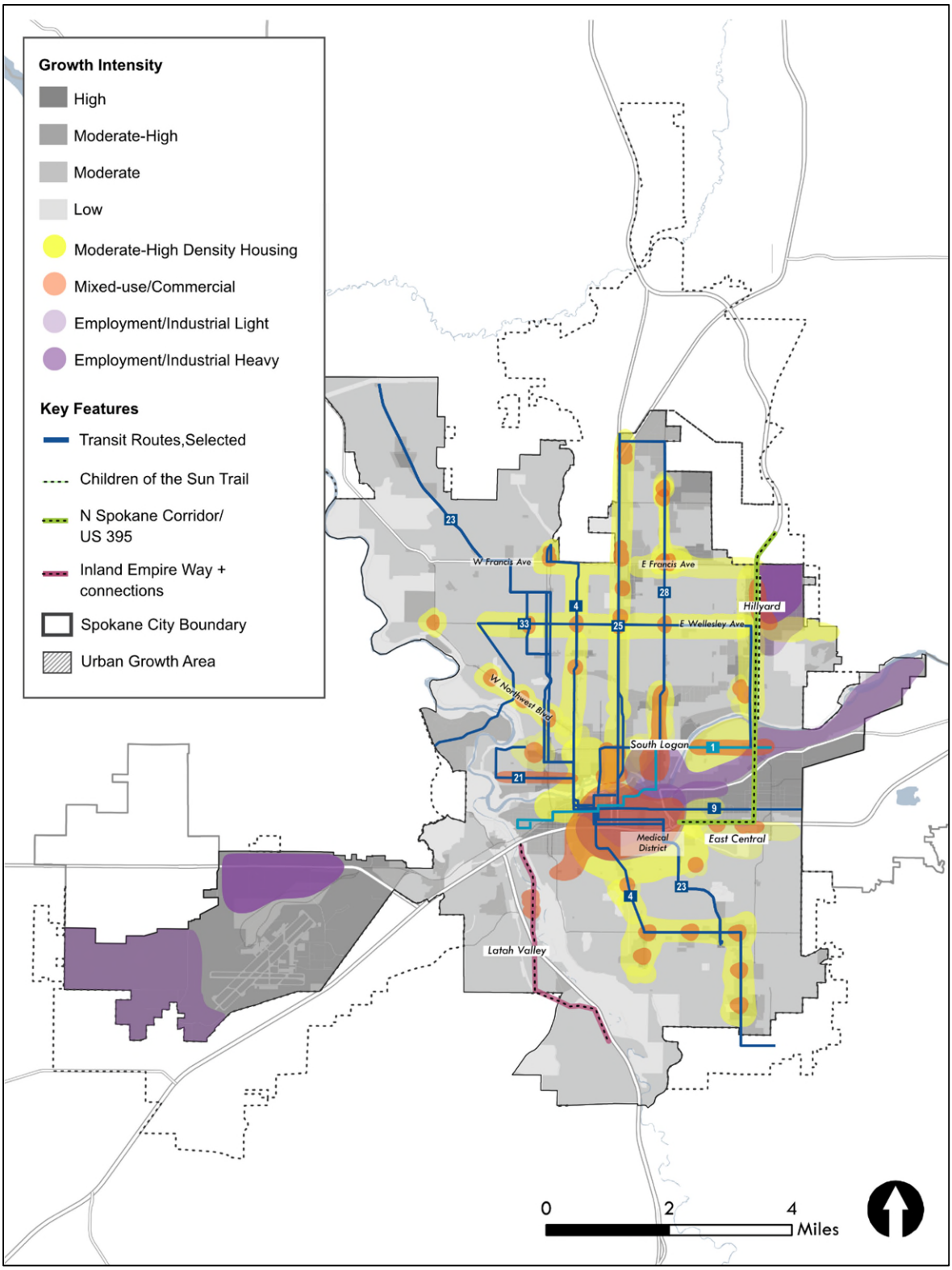
The Preferred Alternative growth intensity areas are shown in **Exhibit 2.4-12,** and areas of focus for future land use and zoning changes are shown in **Exhibit 2.4-13** reflecting the Plan Commission and City Council review in spring 2026. Net new housing units based on distribution of housing targets to areas of focus are shown in **Exhibit 2.4-14**. New jobs are shown in **Exhibit 2.4-15** based on the SRTC model as noted above. For the distribution of housing and jobs by Transportation Analysis Zone, please see **Chapter 6 Appendix B.**

A comparison of the Preferred Alternative to the other alternatives and elements that are similar includes:

- Like Alternative 3 the Preferred Alternative focuses housing growth in major hubs, particularly in the Center City, and provides additional education/health jobs in the city center and University Area. It concentrates new industrial jobs in public development authorities in West Plains and Northeast Spokane.
- Like Alternative 2, the Preferred Alternative designates mixed use and housing growth along bus rapid transit lines and corridors that have frequent transit. Corridors would have a range of businesses, housing densities, and livability/streetscape improvements. Several corridors improve connections between major hubs (Downtown transit and street network, airport, rail corridors, NSC). Like Alternatives 2 and 3, the Preferred Alternative allows new neighborhood/small scale retail nodes according to locational criteria.
- Like Alternatives 2 and 3, 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 that is a higher density than middle housing. The Preferred Alternative includes new Land Use and Housing Elements that identify and begins to undo racially disparate impacts in housing and establish anti-displacement policies under HB 1220.
- Like Alternative 1, the Preferred Alternative includes the regional transportation plan jobs allocation, set for the period 2022-2046, and is in the range of Alternatives 2 and 3.

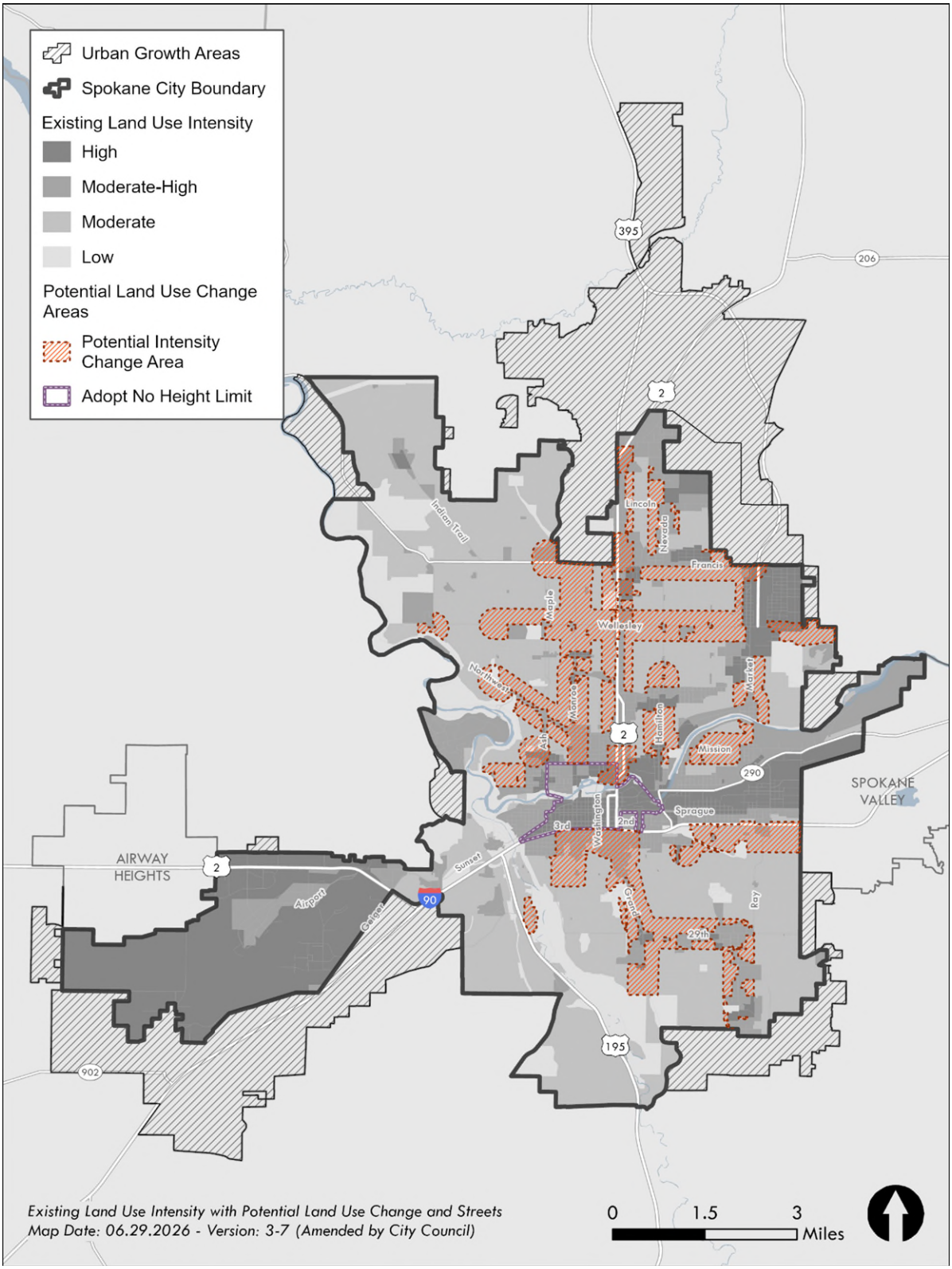
- Like Alternatives 2 and 3, the Preferred Alternative simplifies the land use plan so that there are fewer land use designations, which are then implemented by multiple zones.
- Like Alternatives 2 and 3, the Preferred Alternative includes an infill exemption (RCW 43.21c.229) along frequent transit routes, particularly bus rapid transit, and potentially includes a planned action with upfront environmental review and mitigation measures for jobs centers, focused on light industrial and commercial /mixed-use. The City may also raise SEPA categorical exemption thresholds citywide (WAC 197-11-800).
- Like Alternatives 2 and 3, the Preferred Alternative includes new climate adaptation and mitigation goals and policies per HB 1181 integrated throughout the Comprehensive Plan elements. The Preferred Alternative also updates critical areas regulations.

Exhibit 2.4-12. Preferred Alternative Land Use Growth Strategy



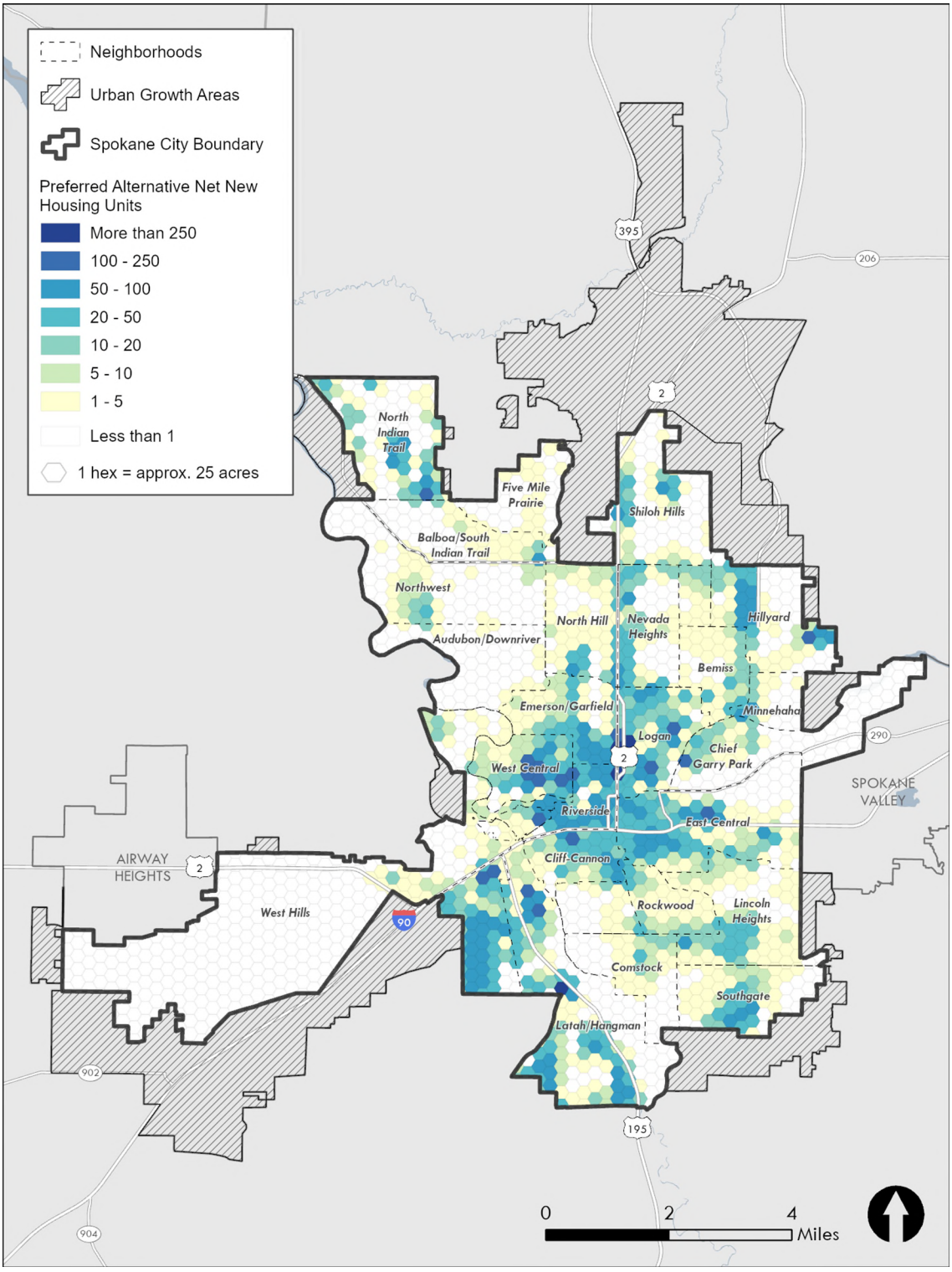
Note: There will be neighborhood-serving commercial opportunities that could locate in residential areas based on criteria that are not geographically identified on the map.
Source: City of Spokane, 2026.

Exhibit 2.4-13. Preferred Alternative Growth Intensity and No Height Limit Area



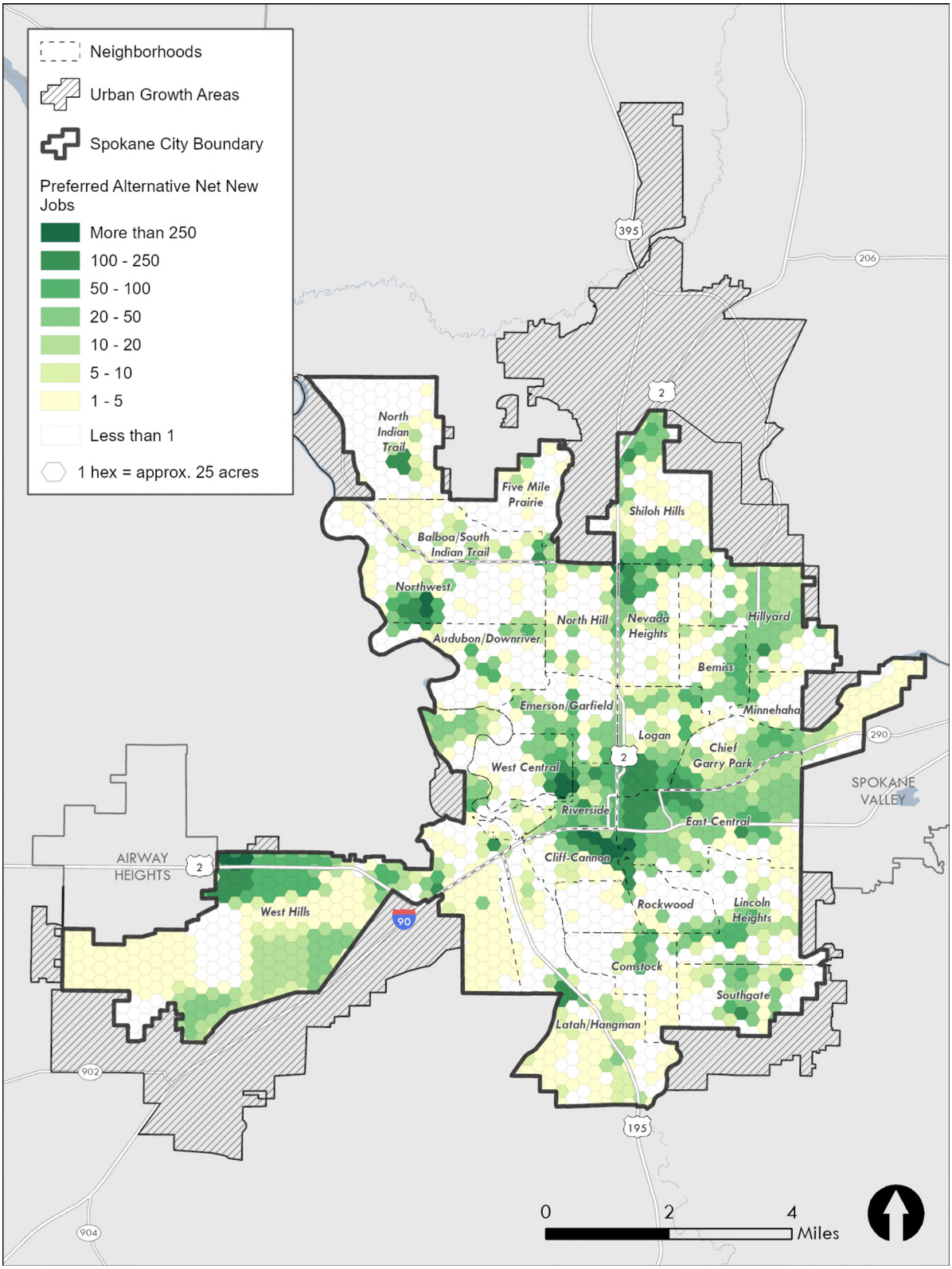
Source: City of Spokane, 2026.

Exhibit 2.4-14. Preferred Alternative Housing Growth



Note: This map shows net new units based on housing targets for 2046. It should be noted that the units lost to fire in fall 2026 are anticipated to be rebuilt in the northwest portion of the City (they are part of the units assumed to be in the baseline as of 2025).
Source: City of Spokane, 2026.

Exhibit 2.4-15. Preferred Alternative Job Growth



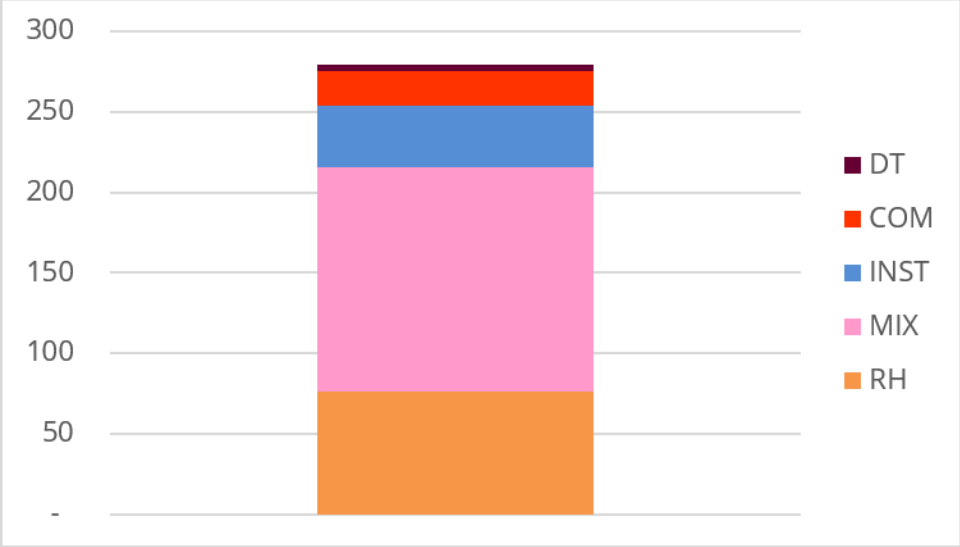
Source: City of Spokane, 2026.

Future Land Use – Initial Land Capacity Analysis

As noted above, the Preferred Alternative simplifies the current detailed Future Land Use Plan categories allowing implementing zoning to be more detailed. For comparison purposes, the "baseline" future land use consolidating designations in the No Action Alternative is shown in **Exhibit 2.4-19** and the simplified Preferred Alternative Future Land Use plan is shown in **Exhibit 2.4-20.** Differences between the "baseline" and Preferred Alternative future land use plans are shown in **Exhibit 2.4-21** and align with areas of growth intensity on **Exhibit 2.4-12** and **Exhibit 2.4-13** above.

Within the Future Land Use change areas there are about 279 acres of buildable lands with residential capacity. This includes vacant, underutilized, or partially used properties identified in the City's 2025 Land Capacity Analysis, and commercial redevelopable parcels per **Chapter 3 Exhibit 3.5-40** that have less intense existing uses than what the FLUM now anticipates. Most of the buildable acres are planned for Mixed Use and Residential High designations per **Exhibit 2.4-16**.

Exhibit 2.4-16. Future Land Use Change Areas and Buildable Acres



Legend: DT – Downtown, COM – Commercial, INST – Institutional, MIX – Mixed Use, RH – Residential High
Sources: City of Spokane, 2026; BERK, 2026.

Having more location-specific information about the Preferred Future Land Use Plan changes, this Final EIS provides an initial land capacity analysis. See **Exhibit 2.4-17**. The method includes:

- Overlaying the areas of Future Land Use change on buildable acres identified in the 2025 Land Capacity Analysis,
- Identifying additional underutilized land comparing properties with less intense uses than would be allowed under the Preferred Future Land Use Plan (e.g., Commercial Properties likely to Redevelop in **Exhibit-3.5-40**).
- Considering the share of residential uses in mixed use and commercial zones based on the 2025 Land Capacity Analysis, recent trends in Downtown, and anticipated unit types (e.g., in low rise mixed use areas),

- Applying discounts (e.g., percent unbuildable) from the 2025 Land Capacity Analysis,
- Applying densities per the Draft Comprehensive Plan Growth Strategy Element and 2025 Land Capacity Analysis, and
- Applying a market factor per the 2025 Land Capacity Analysis.

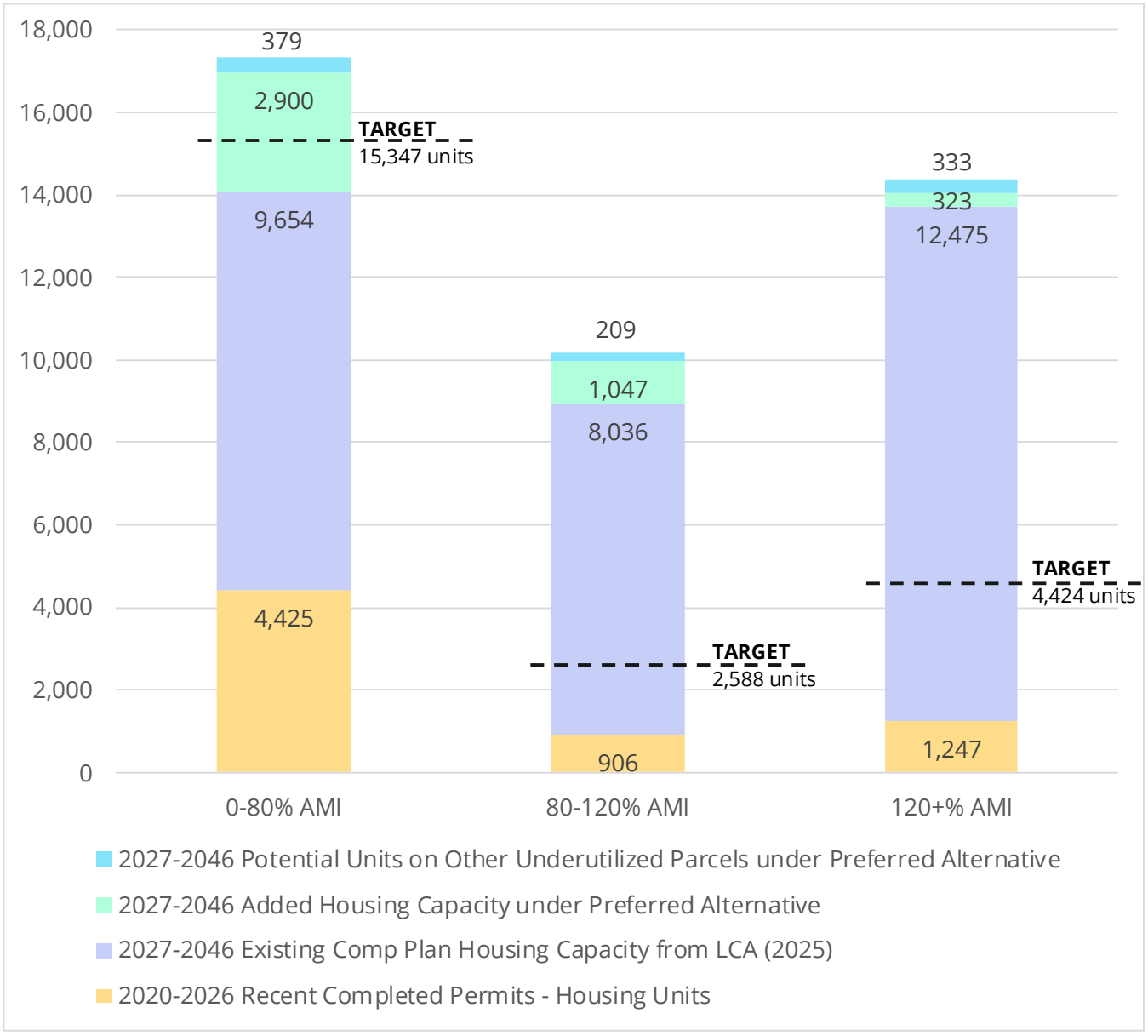
Under the Preferred Alternative, initial results show added capacity of about 5,191 units at primarily low-rise multi-unit densities which addresses the 0-80% AMI deficit under the No Action Alternative (per **Exhibit 2.2-3**). Added to available land capacity for developable areas not identified for FLUM changes continues to show sufficient capacity for the City's total housing target. See **Exhibit 2.4-17** and **Exhibit 2.4-18**. When the City finalizes implementing zoning with more detailed districts and standards, capacity results may be refined.

Exhibit 2.4-17. Preferred Alternative Future Land Use Change Areas Initial Housing Unit Capacity

	0-80%AMI	80-120% AMI	120+%AMI	Total	Source
2020-2046 Housing Growth Allocations / Need	**15,347**	**2,588**	**4,424**	**22,359**	**HAPT**
2020-2026 Recent Completed Permits - Housing Units	4,425	906	1,247	6,578	Recent Completed Permits
2027-2046 Existing Comp Plan Housing Capacity from LCA (2025)	9,654	8,036	12,475	30,165	Alternative 1 – LCA 2025
2027-2046 Net Housing Capacity (Under Existing Plan)	-1,268	6,354	9,298	14,384	***Alternative 1***
2027-2046 Added Housing Capacity under Preferred Alternative (due to changes to FLUM)	2,900	1,047	323	4,270	Preferred Alternative – with LCA Methods
Potential Units on Other Underutilized Parcels under Preferred Alternative	379	209	333	921	Preferred Alternative – EIS Evaluation
2027-2046 Net Housing Capacity (Under Preferred Alternative)	2,011	7,610	9,954	19,575	***Preferred Alternative***

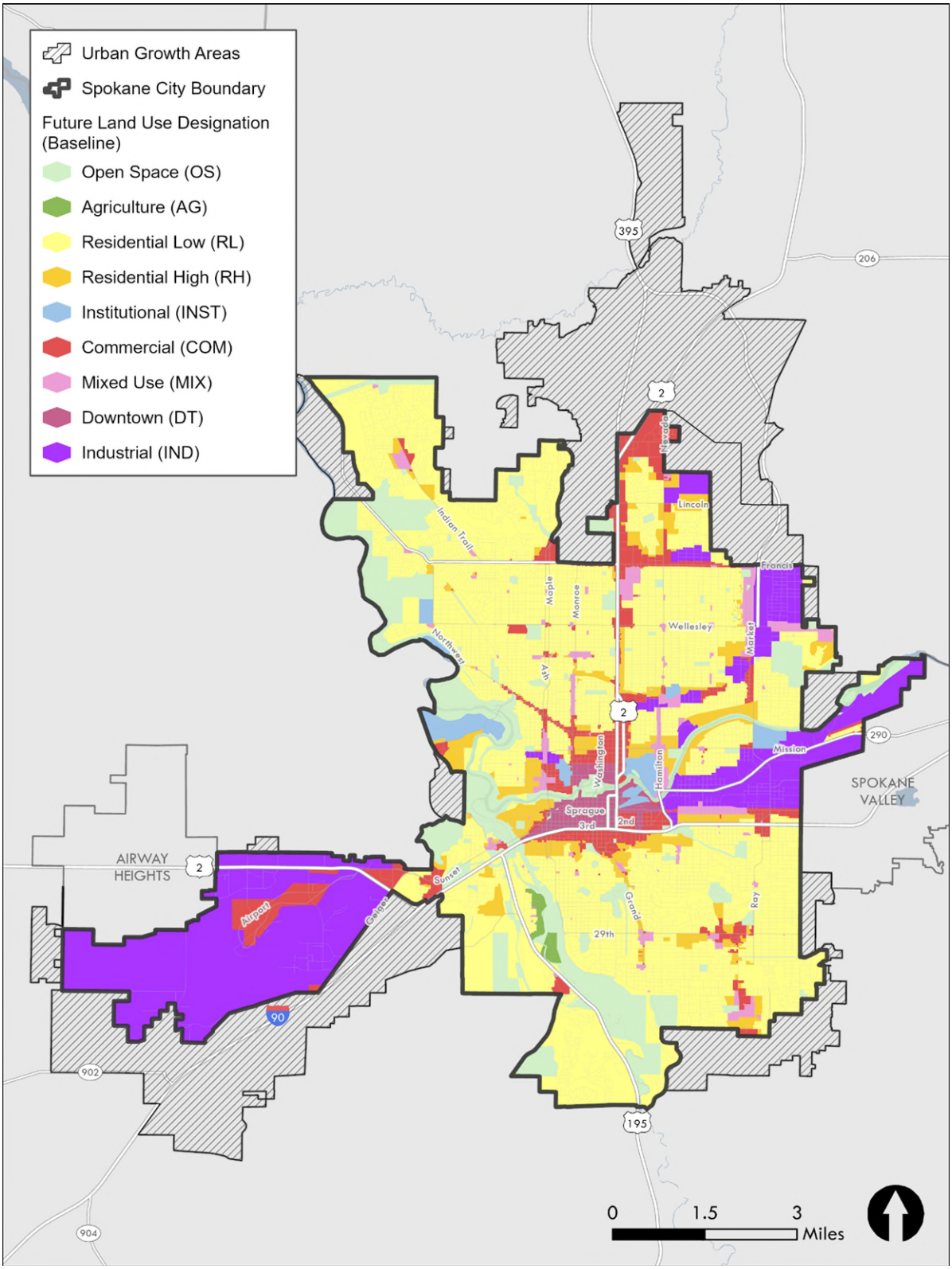
Assumed Densities in Units per Acre: RH and COM: 30, MIX and INST 35, DT 50. RL and other designations like 2025 Land Capacity Analysis.
Residential Proportion: RL and RH 100%, MIX and INST 75%, COM 33%, DT 50%.
Completes are updated for the period January 1, 2020 to July 31, 2026.
Source: BERK 2026; City of Spokane 2026.

Exhibit 2.4-18. 2020-2046 Housing Growth Allocations and Capacity by Income Band – Preferred Alternative



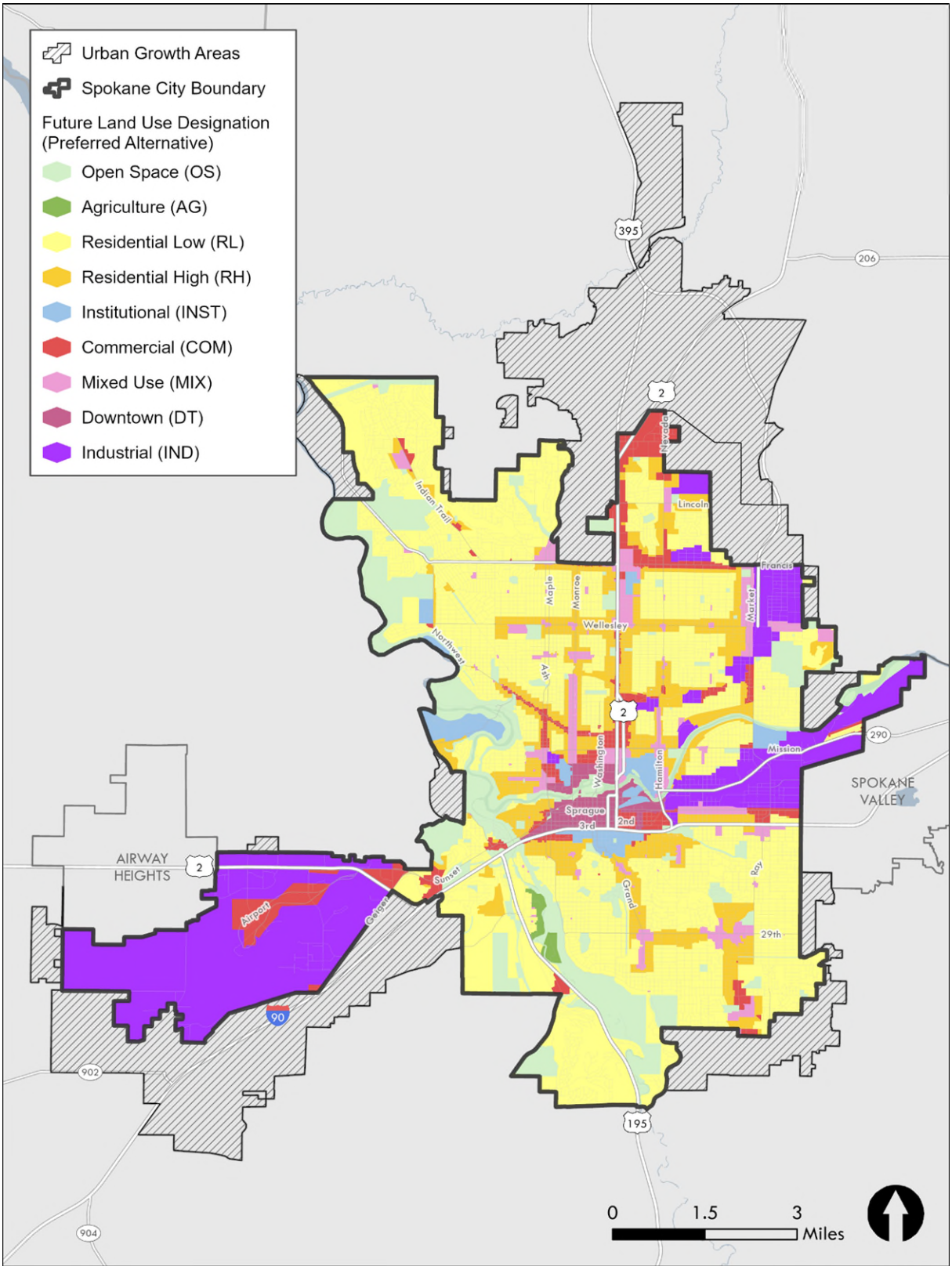
Source: BERK, 2026; City of Spokane, 2026.

Exhibit 2.4-19. Baseline Future Land Use Map (FLUM) Consolidation



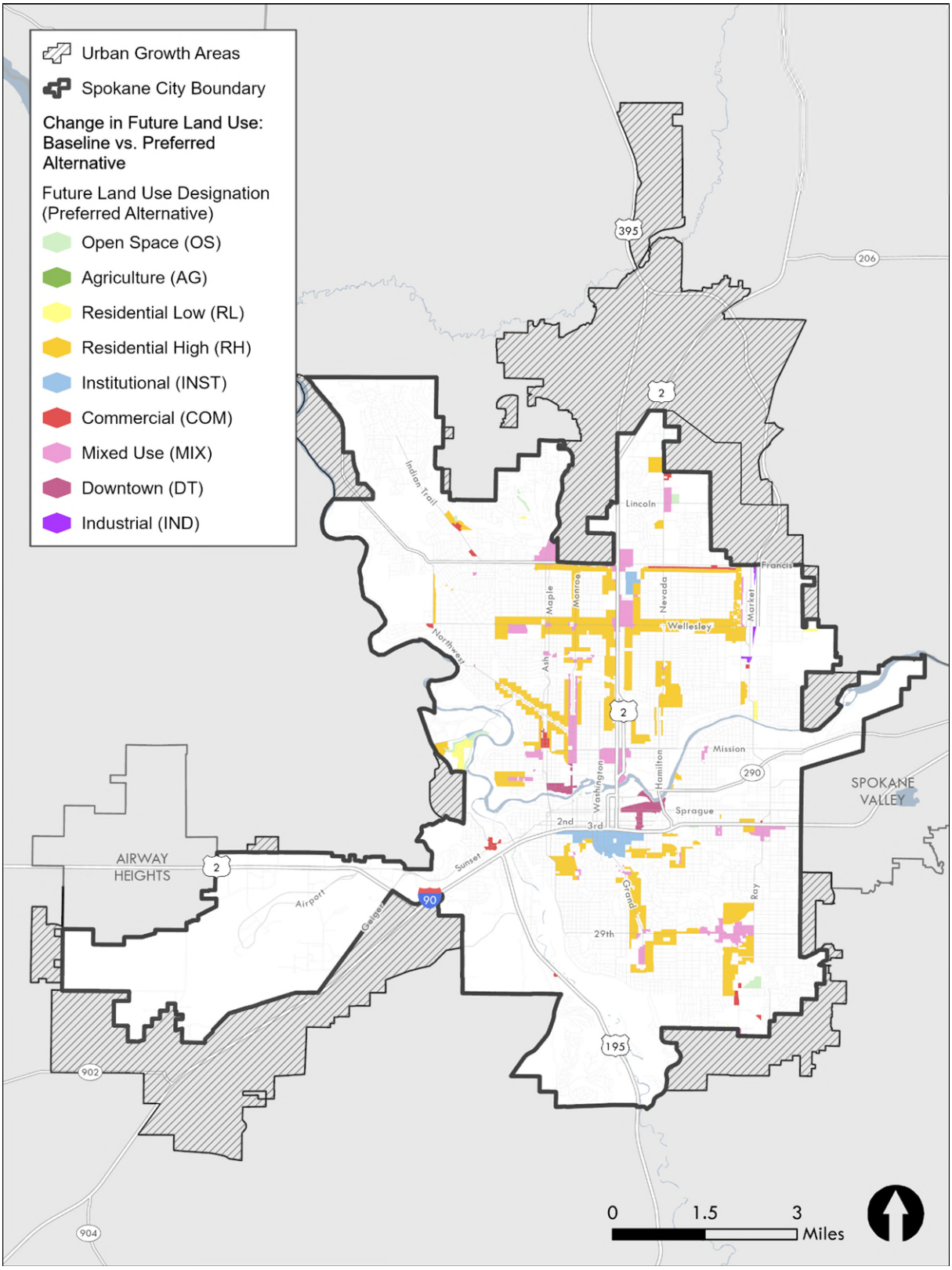
Source: City of Spokane, 2026.

Exhibit 2.4-20. Preferred Alternative Future Land Use Map (FLUM) – Proposed



Source: City of Spokane, 2026.

Exhibit 2.4-21. Preferred Alternative FLUM – Differences with Baseline



Source: City of Spokane, BERK, 2026.

BUILDSpokane

The Preferred Alternative Comprehensive Plan periodic update will be implemented by BUILDSpokane municipal code amendments that ensures that housing types and densities fulfill HB 1220 requirements. Additional changes would streamline and simplify the code, while also adjusting standards where appropriate for environmental quality and climate resilience such as tree canopy and landscape standards. The changes are highlighted below in **Exhibit 2.4-22**.

Exhibit 2.4-22. BUILDSpokane Code Update Themes

Focus Area	Description	Recommendation Highlights
Focus Area 1: Establish Clear and Predictable Development Review Procedures	Update review procedures with focus on efficiency, transparency, and predictability of both process and outcomes	Create a new site plan/land use permit application Expand the types of development and permits exempt from SEPA review as allowed by law
Focus Area 2: Fine -Tune Zoning Districts and Allowed Uses	Align zoning districts and allowed uses with updated Land Use Plan Map Implement regulations to address racially disparate impacts, and reduce the risk of displacement and exclusion in housing development	Adjust Centers & Corridors Concept to Enhance Implementation Outcomes Create a Mixed-Use TOD District Emphasize Revitalization in Downtown Districts
Focus Area 3: Refine Development Standards	Review and revise development standards – design standards in particular – to make sure they are practical and achievable	Ensure applicable standards are proportional to complexity of infill and redevelopment requests Add detail to landscaping and expand tree preservation incentives Draft citywide outdoor lighting standards
Focus Area 4: Create a More User -Friendly Code	Reorganize content in logical outline, ensure language is plain and comprehensible, include graphics and illustrations	

Source: City of Spokane, 2026.

REBUILD Spokane

The Spokane community was directly affected by the Spokane Complex fire in August 2026 in Northwest Spokane and vicinity. The City lost approximately 513 dwellings and more than 74 other structures were destroyed in the city limits, with more losses in the surrounding county. There was significant loss of tree canopy as well and numerous effects on the Spokane River and ecological systems within and adjacent to the burn area. The immediate focus of the City is to prioritize emergency response and support rebuilding of homes in affected neighborhoods.

The need to rebuild does not increase the City's 2020-2046 growth targets. Rebuilding has begun and the City will meet its long-term obligations to implement the updated Comprehensive Plan and development regulations to manage growth, provide additional housing and economic opportunities, plan for necessary services and infrastructure (e.g., fire protection, streets, stormwater, parks), improve environmental and climate resilience, and more.

A summary of the damage is available here: REBUILD Spokane Dashboard. The City's approach to rebuilding is found at https://my.spokanecity.org/wildfireinfo/rebuilding/. The City is considering development code relief ordinances that would speed up reviews for buildings in the same location, for the same purpose, and roughly the same size as what was there before the fires. Grants are also available for street tree installations.

2.4.6 Growth Capacity Comparisons – No Action and Preferred Alternatives

NOTE: *This analysis was added with the Final EIS.*

Both the No Action and Preferred Alternatives have greater capacity for housing and population than expected in the 20-year period which is based on allocations of growth under the State OFM's medium (most likely) forecast. Under maximum potential development scenarios housing capacity is greater than 20-year housing growth targets under the No Action Alternative (39% capacity above target) and Preferred Alternative (63% of capacity above targets). Development based on maximum potential development is not likely in the 20- year period (through 2046) and would not match the State OFM's most likely medium growth forecast allocated by Spokane County and cities which is 22,359 for the period 2020-2046, adjusted to 21,738 for the 2022-2046 period, which is a focus in this EIS. (Planning Technical Advisory Committee, 2025) This EIS compares the No Action and Preferred Alternative land capacity information in **Chapter 3** to provide a conservative analysis.

Based on this initial evaluation of the Preferred Alternative Future Land Use Map (**Exhibit 2.4-20 and Exhibit 2.4-21**), the capacity for housing in the city would increase by 17% on about 6% (284 acres) of the buildable land (over 4,500 acres across the city), mostly along frequent transit corridors and in urbanized areas. See **Exhibit 2.4-23**.

Exhibit 2.4-23. Housing Capacity Comparisons

	Housing Units	Capacity above Target	% Capacity Above Target	Difference Total Housing Capacity
HAPT Target (2020-2046)	22,359			
Adjusted Target (2022-2046)	21,738			
No Action Capacity (2025 **Exhibit 2.2-3**)	30,165	8,427	39%	
Preferred Alternative Capacity (**Exhibit 2.4-17**)	35,355	13,617	63%	17%

Source: (City of Spokane , 2025); City of Spokane, 2026; BERK 2026

Both the No Action and Preferred Alternative have a greater capacity for population than the target. Under the Preferred Alternative, there could be an increase in population of 9,177above the No Action population estimates (new housing capacity at 2.05 persons per household, an average of 1.6 persons per dwelling unit assumed for multi-unit development and 2.5 for single units in the 2025 Land Capacity Analysis). This is 14% higher than the population capacity of 63,301 associated with the No Action Alternative. (City of Spokane , 2025) See **Exhibit 2.4-24.**

Exhibit 2.4-24. Population Capacity Comparisons

POPULATION TARGET	Population	Capacity above Target	Percent Of Capacity above Target	Difference in Total Capacity
Population Target (2023-2046)	23,357			
Adjusted Target (2022-2046)	25,157			
Maximum Studied in this EIS (2022-2046)	50,650			
No Action Capacity (2025)	63,301	38,144	152%	
Preferred Alternative Capacity (2026)	72,478	47,321	188%	14%

Source: (City of Spokane , 2025); City of Spokane, 2026; BERK 2026

2.4.7 Future Alternatives

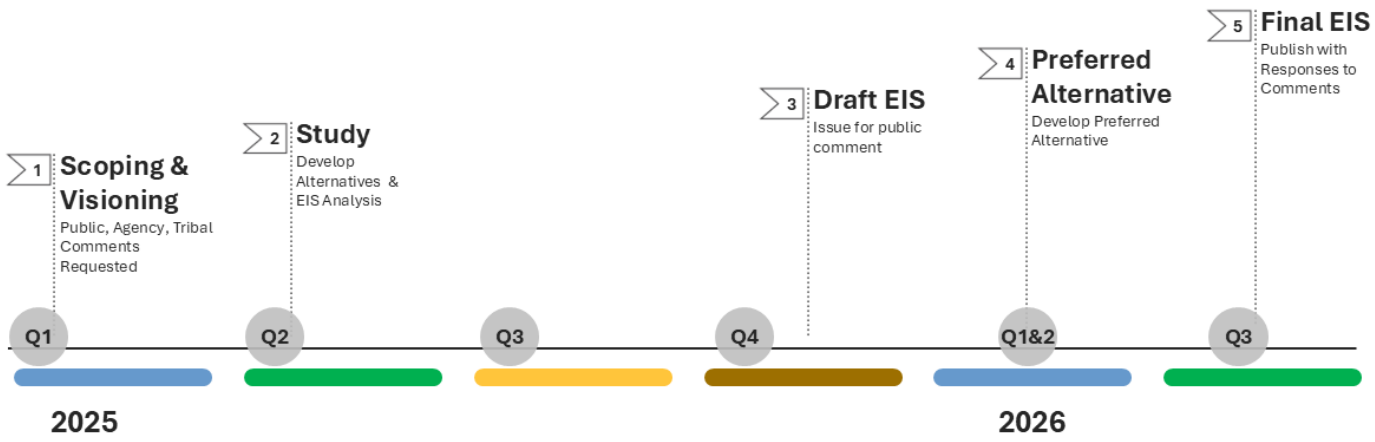
The Draft EIS ~~presents~~ presented three alternatives to test different growth patterns and policies. ~~It is expected that the City will create~~ The City created a preferred alternative based on public input and the Draft EIS evaluation of the range of the alternatives. The preferred alternative ~~may be one of the action alternatives or be~~is a combination of one or more features of any of the studied alternatives. The Final EIS ~~will evaluate~~ evaluates the preferred alternative and responds to comments received on the Draft EIS. Through the Comprehensive Plan periodic review legislative hearing and deliberation process, the Plan Commission and City Council may adjust features of the Preferred Alternative in the range of the Draft EIS and Final EIS evaluated alternatives.

2.5 SEPA Process

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

The process for the EIS included ~~The process for an EIS includes~~ a scoping period to share likely topics and alternatives and invite comments, a comment period on the Draft EIS, and a Final EIS that responds to comments. See **Exhibit 2.5-1**. The scoping period lasted from February 5, 2025 to April 7, 2025. The Draft EIS Comment period ~~extends~~ was scheduled from **December 18, 2025 to February 18, 2026** and the City extended it to **March 4, 2026**. See the **Fact Sheet** for more information ~~about how to comment~~.

Exhibit 2.5-1. SEPA EIS Steps



NOTE: *The exhibit above was updated with the Final EIS.*

2.6 Benefits and Disadvantages of Delaying the Proposed Action

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

that is required by state law under GMA, this section addresses the potential benefits and disadvantages of delaying the proposed action.

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

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

3 Environment, Impacts, and Mitigation Measures



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

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

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

3.1 Earth, Water Quality, and Water Resources

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

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

3.1.1 Affected Environment

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

- Earth: terrain, land use, impervious cover, soils and infiltration, geologic hazards, contaminated soils, and environmental health disparities.
- Water Resources: Surface waters, water quality impairments, shorelines, floodplains, groundwater resources, and environmental health disparities. Wetlands are discussed in **Section 3.3** Plants and Animals and the storm drainage system is discussed in **Section 3.9** Utilities.

Earth

Terrain

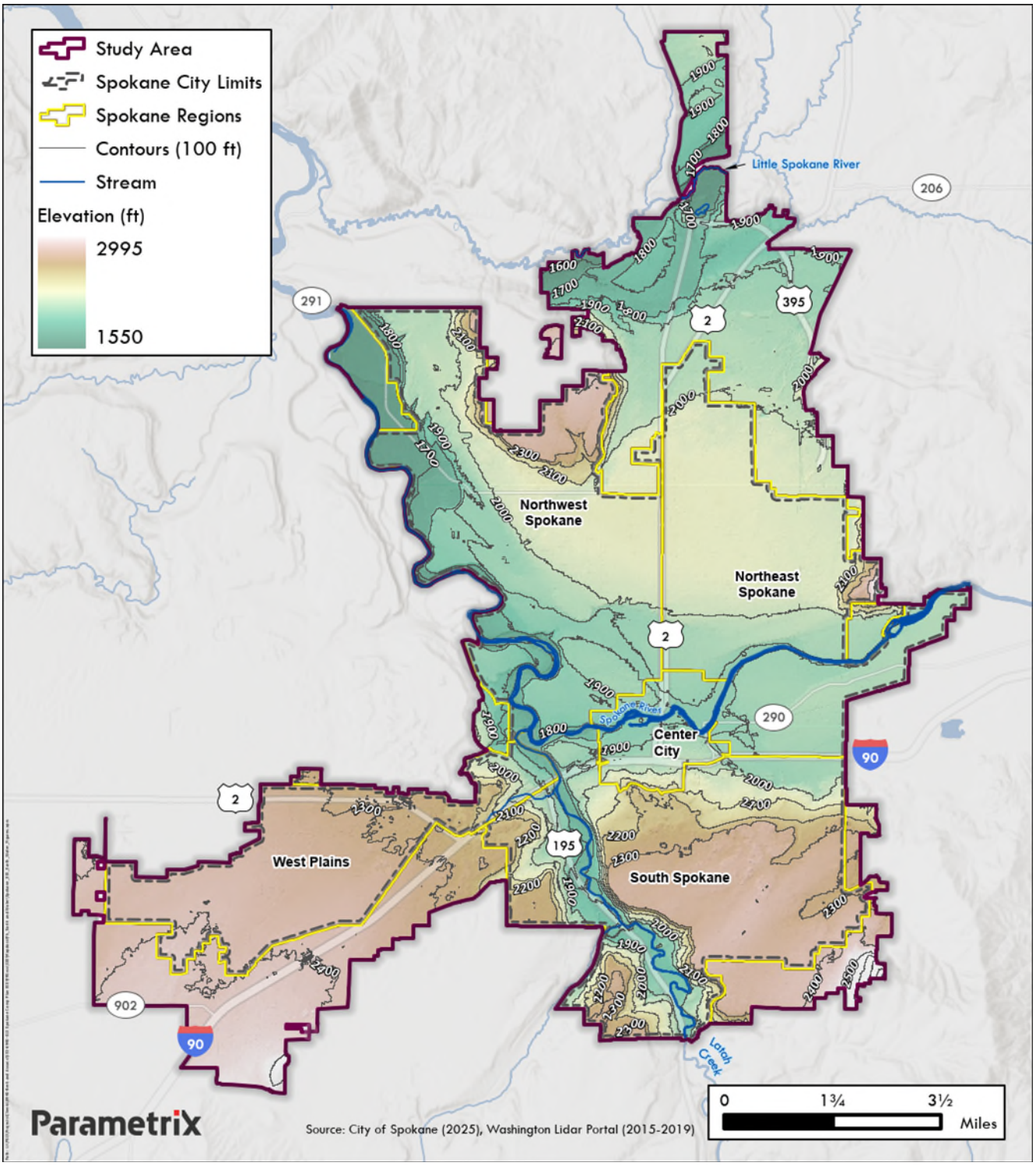
Steep slopes can be vulnerable to erosion and landslides, while flat areas may be at higher risk for flooding. The city and surrounding study area are relatively flat, with no more than two percent slopes in most areas. The steepest terrain is in South Spokane around the Latah Creek (also known as Hangman's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

Land Use and Zoning

Spokane is the largest, most developed city in eastern Washington. Land development creates impacts to earth and water resources through increased vehicle use, commercial and industrial activities that

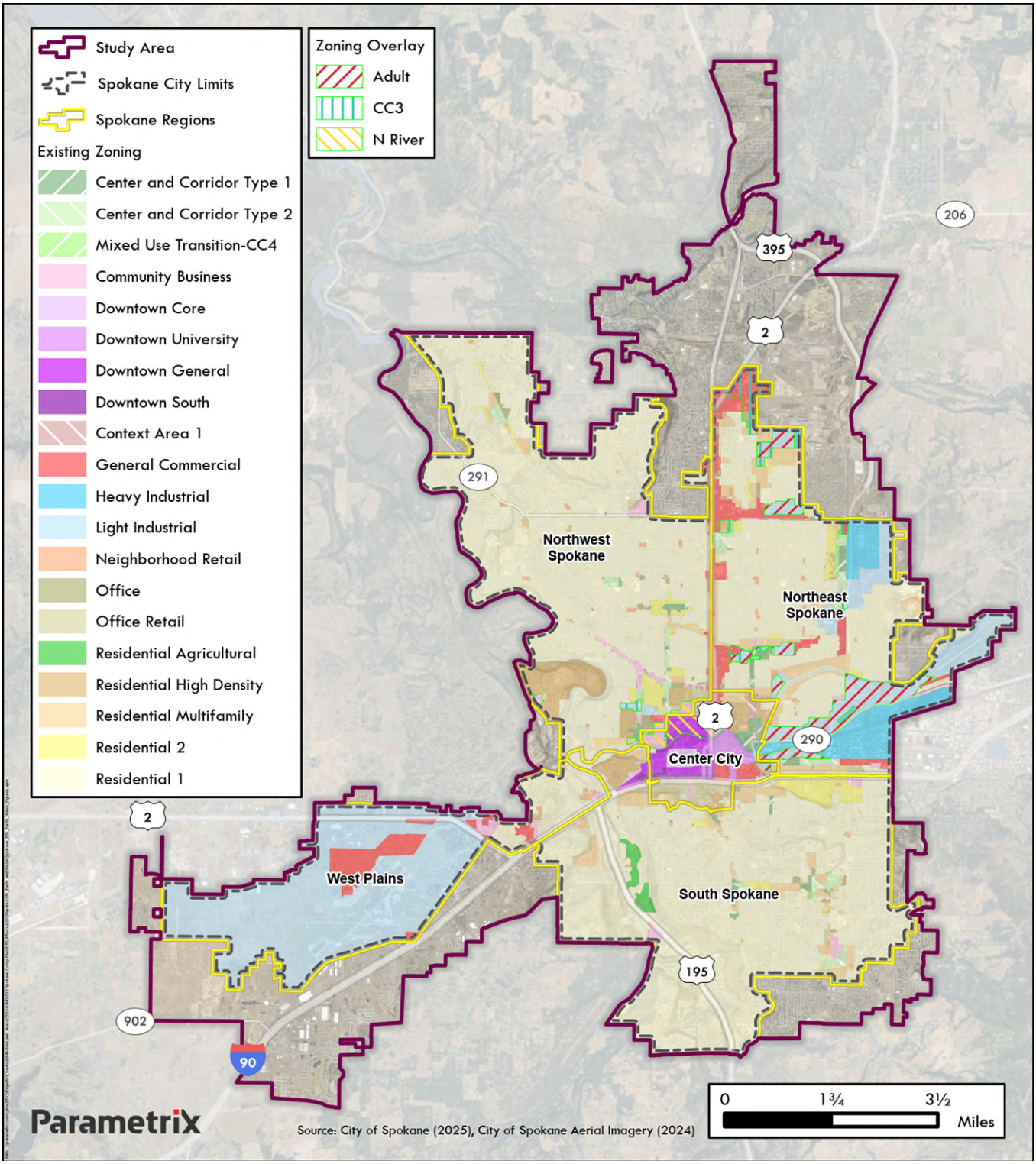
produce waste substances, landscaping with chemicals, and other pollution-generating activities. Current zoning in the study area, which is an indicator of land use, is shown in **Exhibit 3.1-2.**

Exhibit 3.1-1. Terrain



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

Exhibit 3.1-2. Existing Zoning



Source: City of Spokane 2025; City of Spokane Aerial Imagery, 2024.
NOTE: *The exhibit above was updated with the Final EIS.*

Existing zones throughout the city consist predominantly of single-unit residential areas, with commercial and industrial areas focused in Center City and West Plains, respectively. Northeast Spokane has the widest variety of zoning classifications in the study area.

Hard Surface (Impervious) Cover

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

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

Soils and Infiltration

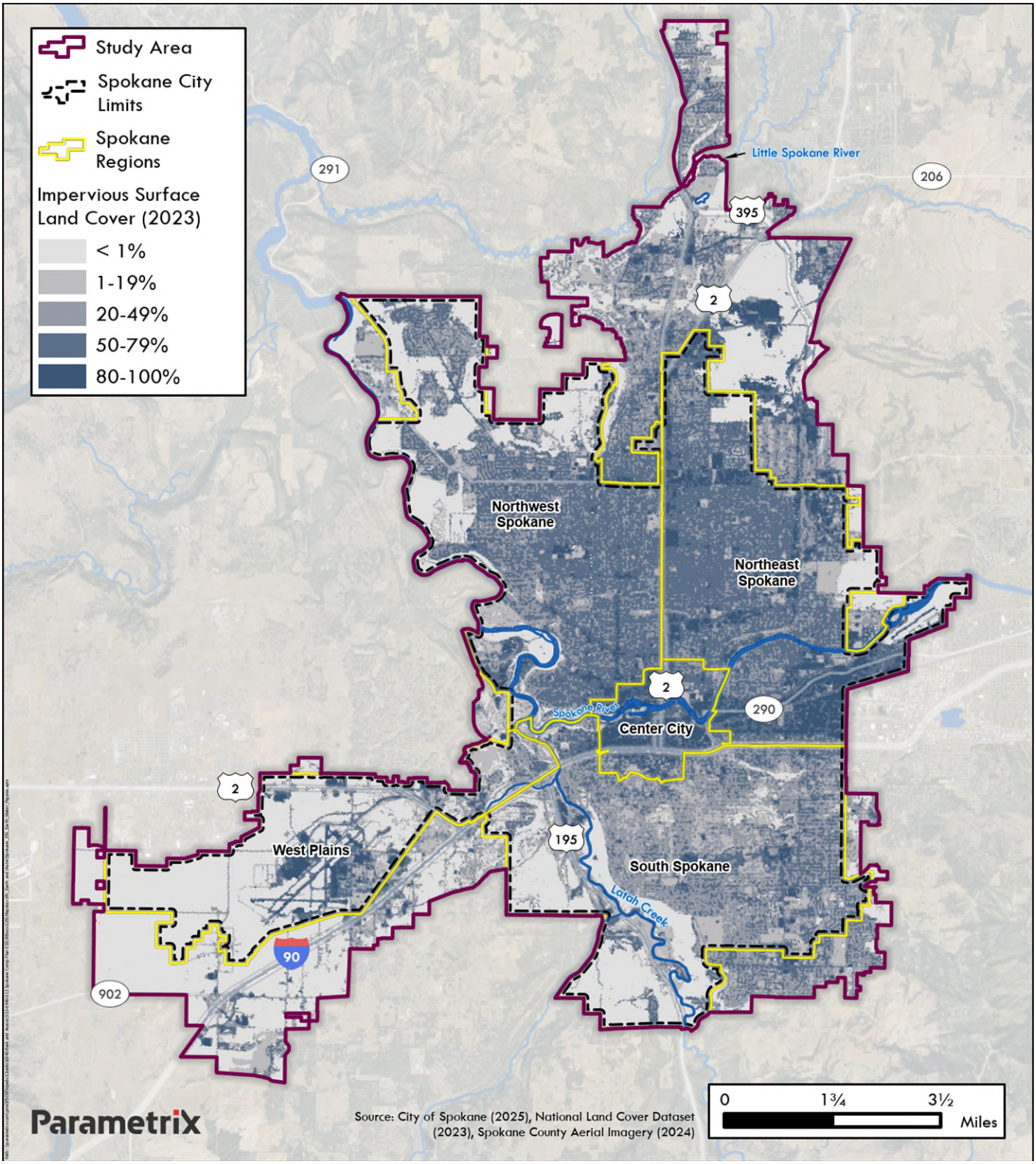
Soil type influences the ground's ability to infiltrate rainwater runoff, which can recharge groundwater aquifers and prevent high flows from scouring stream banks. In the study area, soil infiltration capacity in non-developed areas is high to moderate, as shown in **Exhibit 3.1-4**. Specific soil types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

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

Hazardous Geology and Contaminated Soils

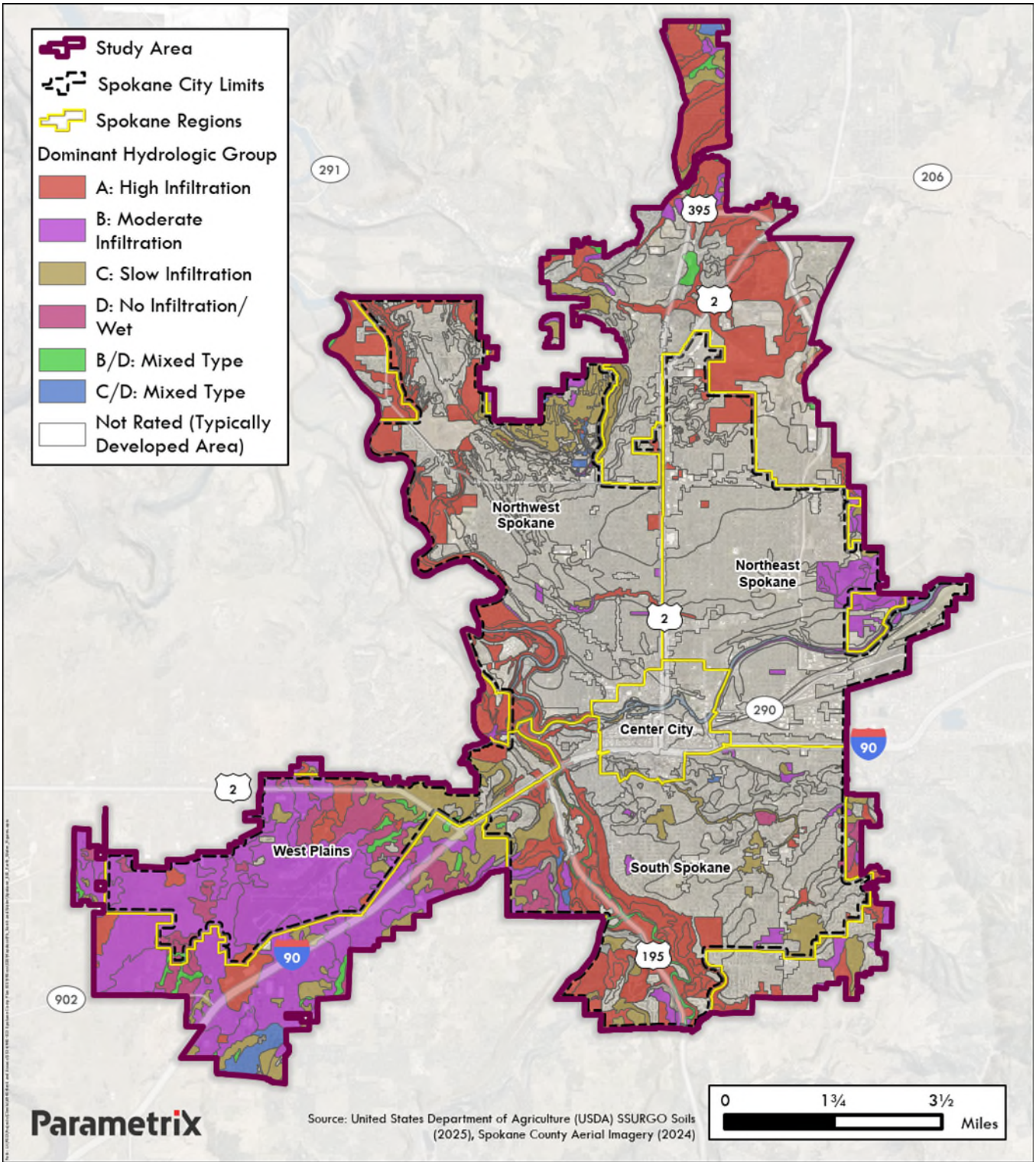
Erodible soils, landslide-prone geologic forms, and potentially contaminated areas identified on the Superfund National Priorities List in the study area are shown in **Exhibit 3.1-6**. The main soil and geology hazard areas are along Latah Creek and other areas in South Spokane and in the north and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

Exhibit 3.1-3. Existing Hard (Impervious) Surfaces



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

Exhibit 3.1-4. Hydrologic Soil Groups



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

Exhibit 3.1-5. Soil Type Summary

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

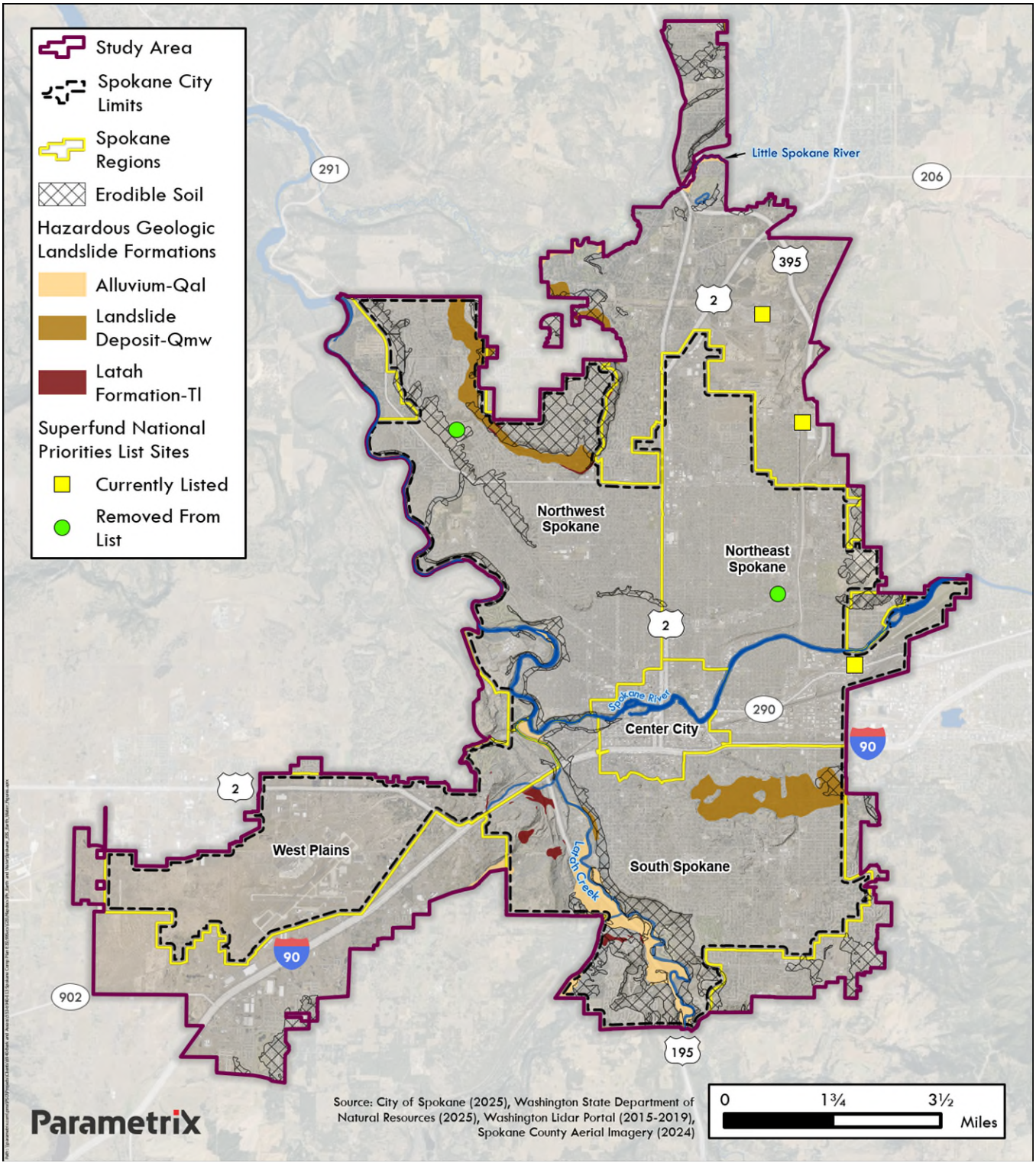
Hydrologic Soil Group	Soil Type
B – Moderate Infiltration	Haploxerolls ashy silt loam, channeled
B – Moderate Infiltration	Lenz-Rock outcrop, complex
B – Moderate Infiltration	Lenz-Spokane, complex
B – Moderate Infiltration	Opportunity very gravelly ashy loam
B – Moderate Infiltration	Quinnamose-Micapeak,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

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

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

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

Exhibit 3.1-6. Hazardous Geology



Source: City of Spokane, 2025; Washington State Department of Natural Resources (WA DNR), 2025; Washington Lidar Portal, 2015 to 2019. **NOTE:** The exhibit above was updated with the Final EIS.

Water Resources

Surface Waters

The study area includes five ~~watersheds~~stream and river drainage basins, shown in **Exhibit 3.1-7**. The main surface receiving waters are the Spokane River and Latah Creek (also known as Hangman's Creek), both of which are fish-bearing. Discussion of fish habitat is presented in **Section 3.3 Plants and Animals**. A summary of the surface water features in the study area is presented in **Exhibit 3.1-8**. Climate change may increase drought conditions and affect surface water supply and flows in the future.

Water Quality Impairments

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

Shorelines

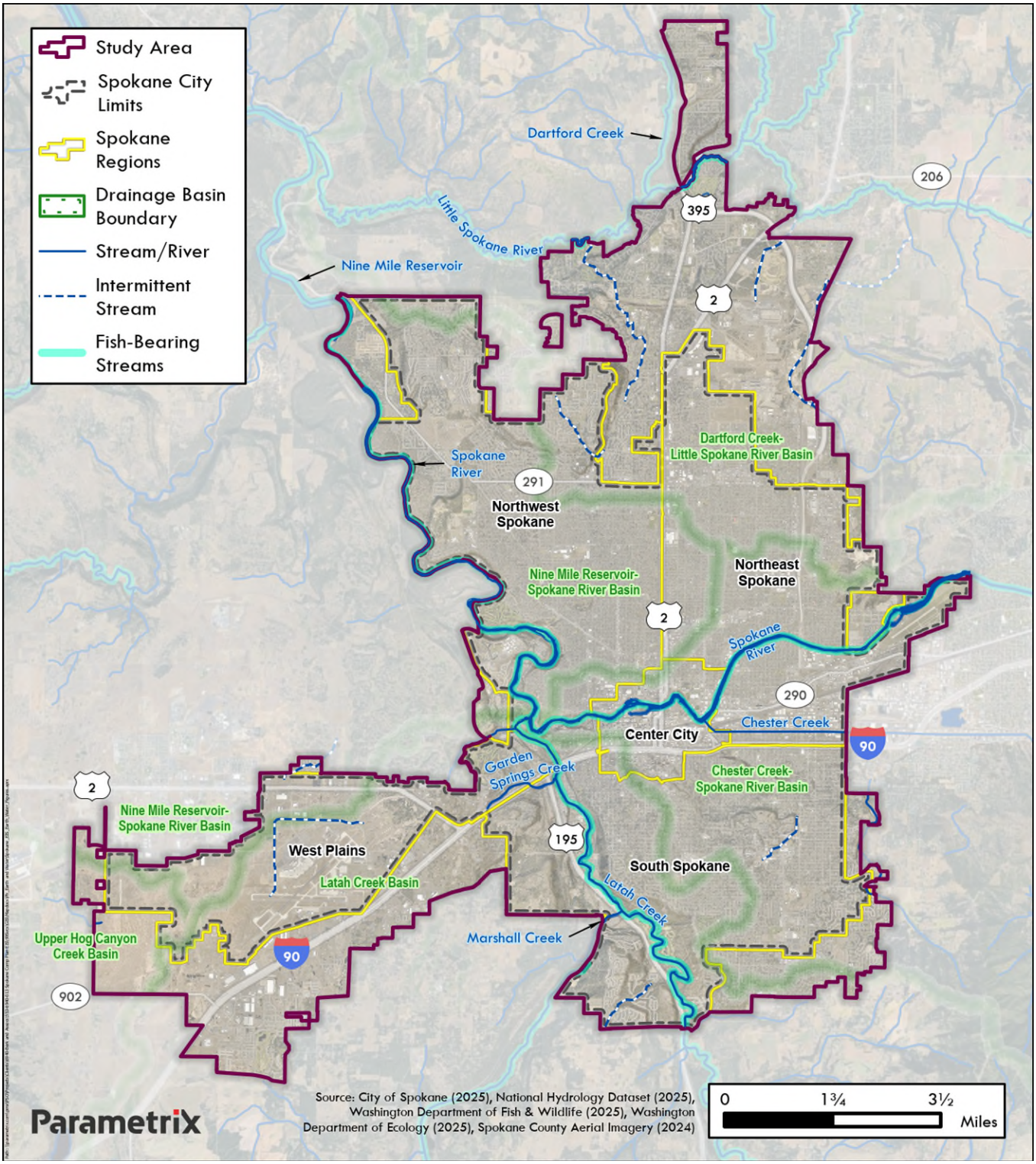
As listed in **Exhibit 3.1-8** and shown in **Exhibit 3.1-10**, three water bodies in the study area have been designated by Washington Administrative Code (WAC) 173-18 Shoreline Management Act as having Shorelines of the State as well as Shorelines of Statewide Significance. Shorelines with these designations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

Floodplains

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

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

Exhibit 3.1-7. Surface Waters



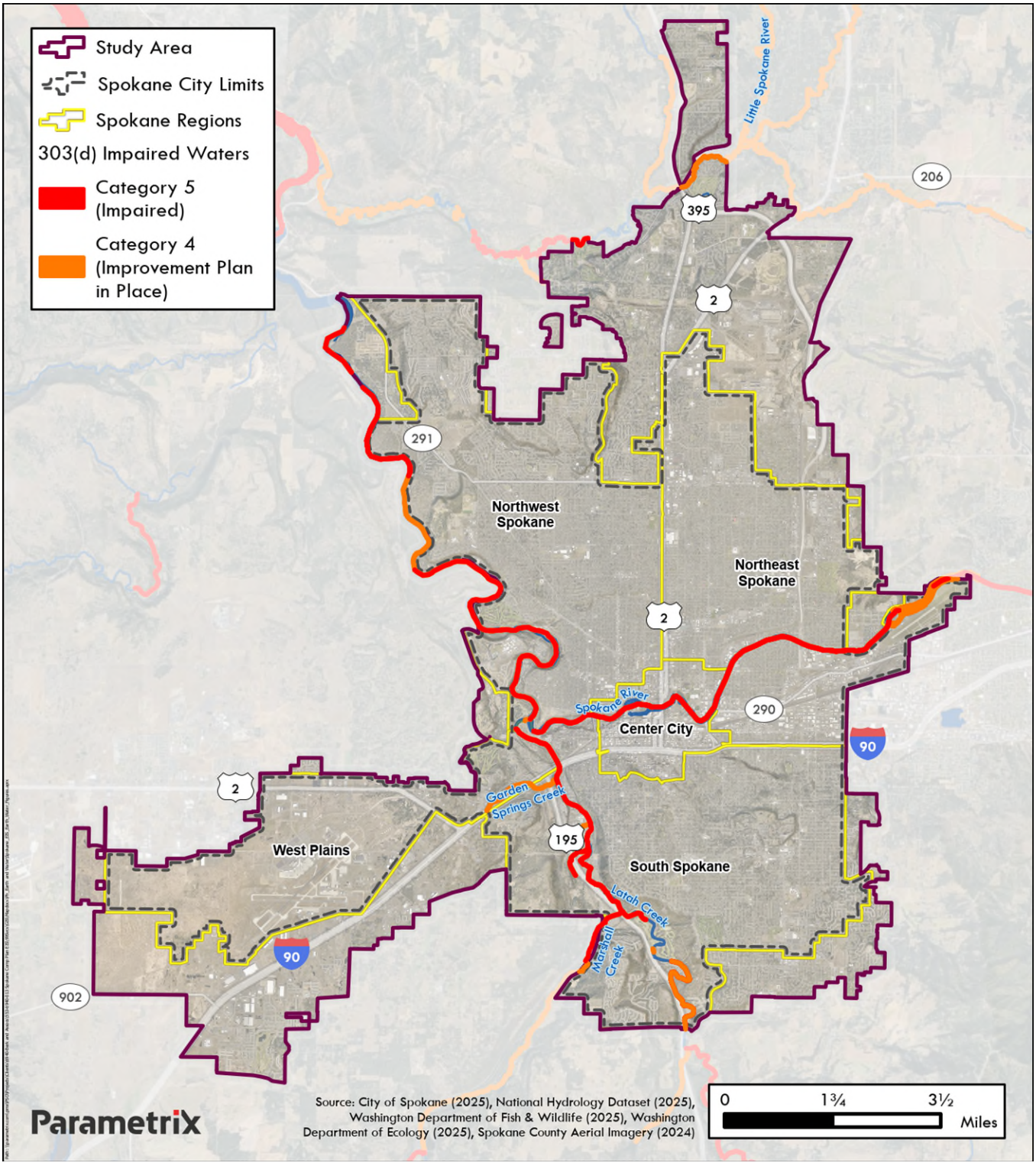
Sources: City of Spokane, 2025; National Hydrology Dataset, Washington, 2025; Department of Fish & Wildlife, 2025; Washington Department of Ecology, 2025; and Spokane County Aerial Imagery, 2024. **NOTE:** The exhibit above was updated with the Final EIS.

Exhibit 3.1-8. Surface Waters Summary Table

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

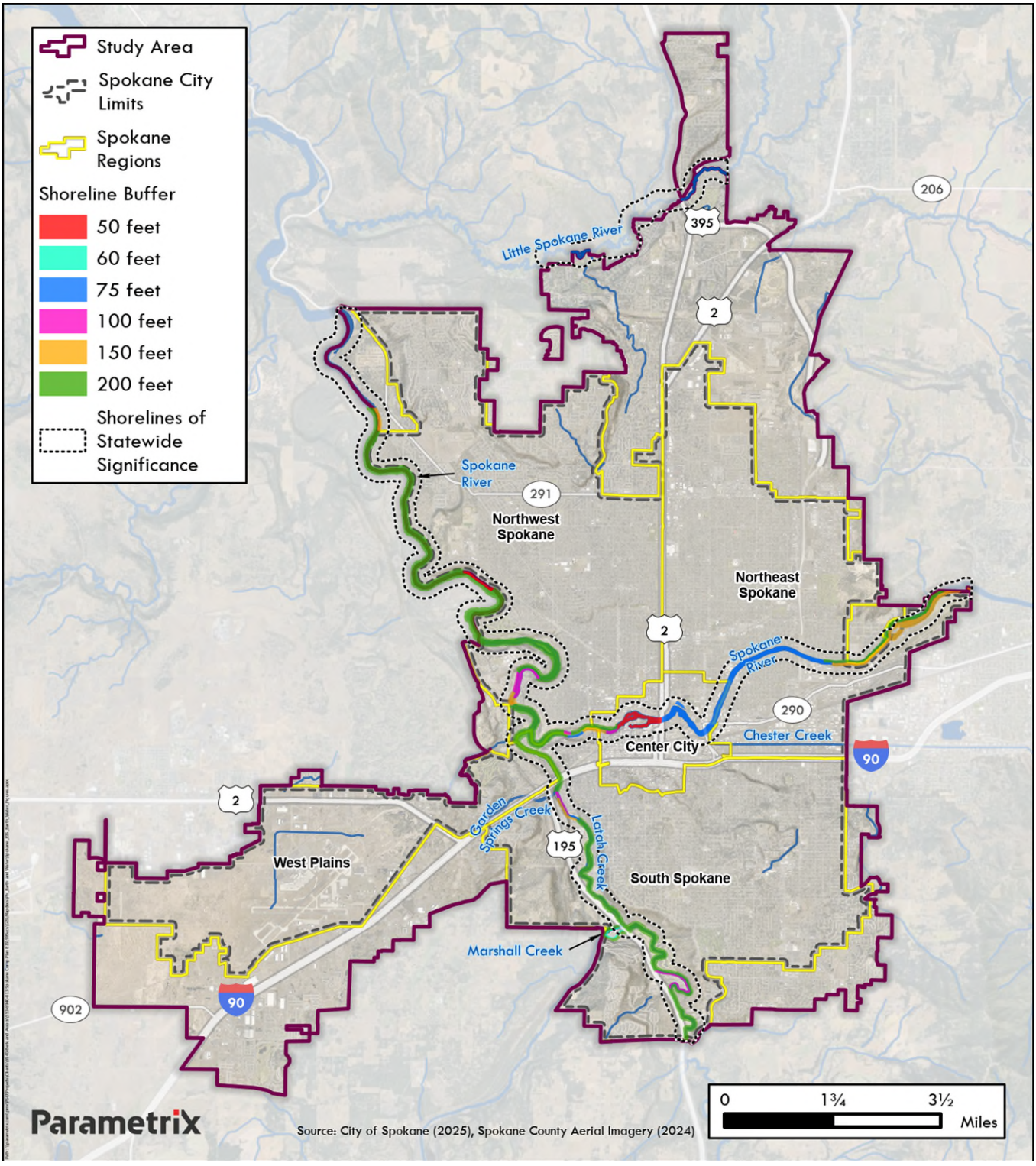
Notes: Category 4A – An EPA-approved Total Maximum Daily Load (TMDL) plan is in place and implemented; Category 4B – A pollution control program, similar to a TMDL plan, is in place that is expected to address the issue; Category 5 – Data shows water quality standards have been violated, improvement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

Exhibit 3.1-9. Water Quality Impairments



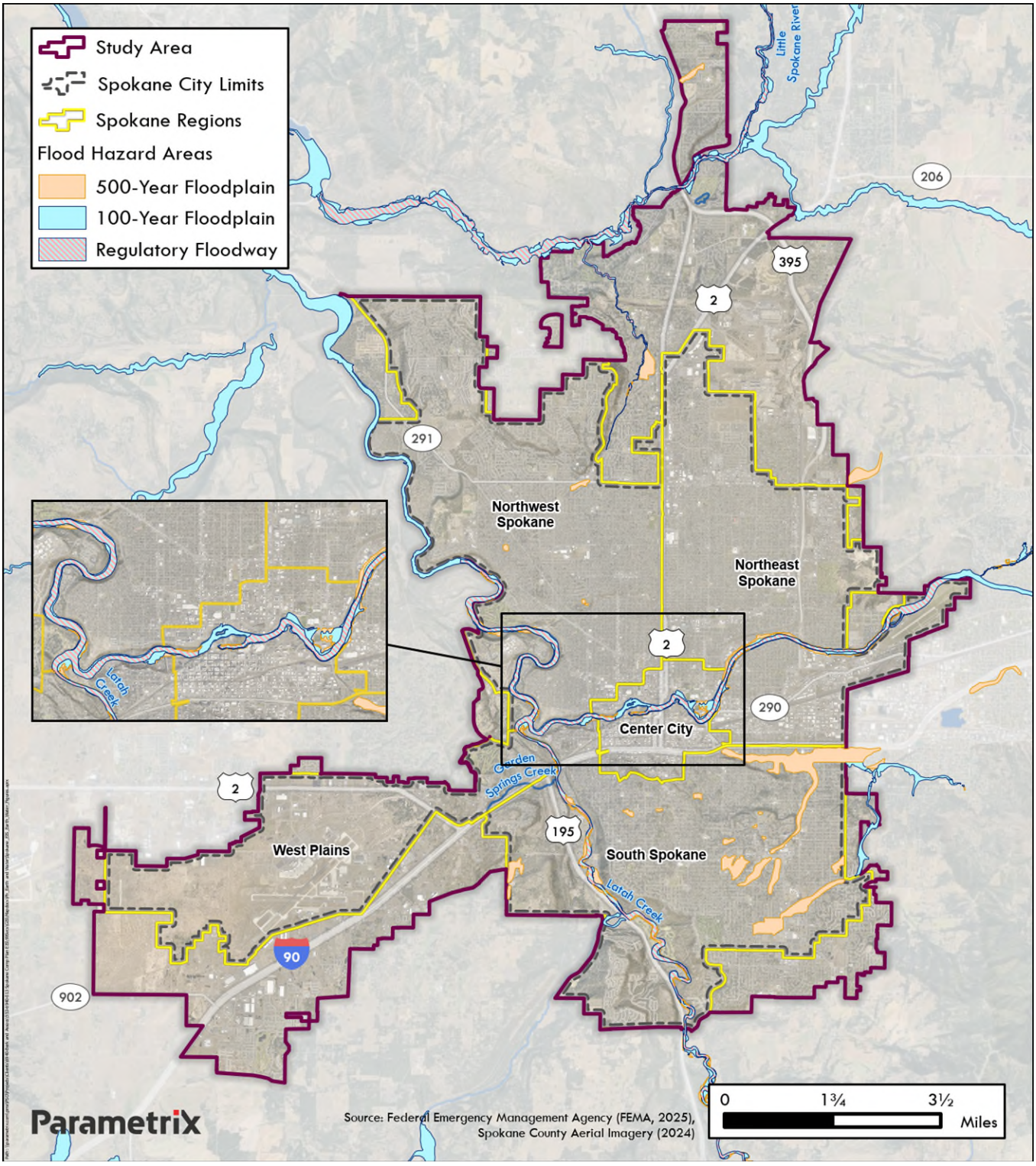
Sources: City of Spokane, 2025; National Hydrology Dataset , 2025; Washington Department of Fish & Wildlife, 2025; Washington Department of Ecology, 2025; and Spokane County Aerial Imagery, 2024. **NOTE:** The exhibit above was updated with the Final EIS.

Exhibit 3.1-10. Shorelines



Source: City of Spokane, 2025; Spokane County Aerial Imagery, 2024. **NOTE:** The exhibit above was updated with the Final EIS.

Exhibit 3.1-11. FEMA Flood Zones



Source: Federal Emergency Management Agency (FEMA), 2025 ; and Spokane County Aerial Imagery, 2024. **NOTE:** The exhibit above was updated with the Final EIS.

Groundwater Resources

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

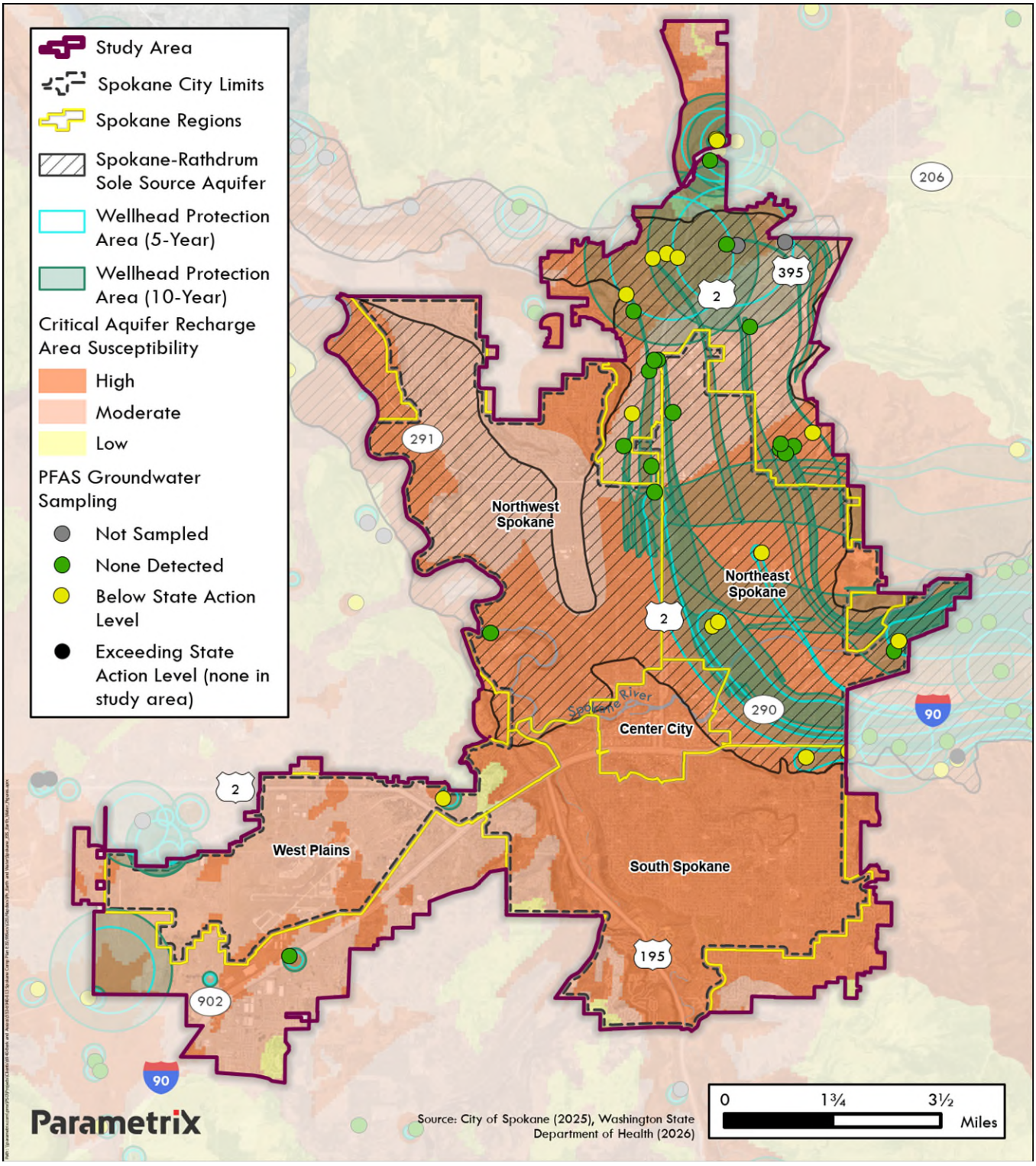
Critical aquifer recharge and wellhead protection areas are located throughout the city. Wellhead protection areas are defined by protection categories that refer to the amount of time it would take contamination to reach the wellhead from the specified area within each boundary. Projection boundaries include the 5- and 10-year time-of-travel boundaries. Required levels of protection and restrictions on certain activities increase for boundaries closer to the wellhead. In addition, t~~T~~he study area contains a portion of the Spokane Valley-Rathdrum Prairie Sole Source Aquifer, located mainly in Northwest Spokane and Northeast Spokane. ~~As a result of an August 5, 2025, ballot measure, the Spokane Valley Rathdrum Prairie Aquifer Protection Area has been expanded to include all areas within the city boundary as of January 1, 2026.~~ Sole source aquifers are identified by the U.S. Environmental Protection Agency (EPA) as aquifers that supply at least 50 percent of the drinking water for a service area where there are no reasonably available alternative drinking water sources should the aquifer become contaminated.

Information on ~~Ecology's findings~~sampling of per- and polyfluoroalkyl substances (PFAS) in public wells is shown in **Exhibit 3.1-12** and testing results ~~contamination in~~of private~~-~~ well groundwater in the West Plains region within and around ~~of~~ the ~~city~~ study area is presented in **Exhibit 3.1-13** and **Exhibit 3.1-14**. Additional information on PFAS sampling throughout the city is presented in the City of Spokane 2024 Water Quality Report available at https://my.spokanecity.org/publicworks/water/quality/.

Environmental Health Disparities

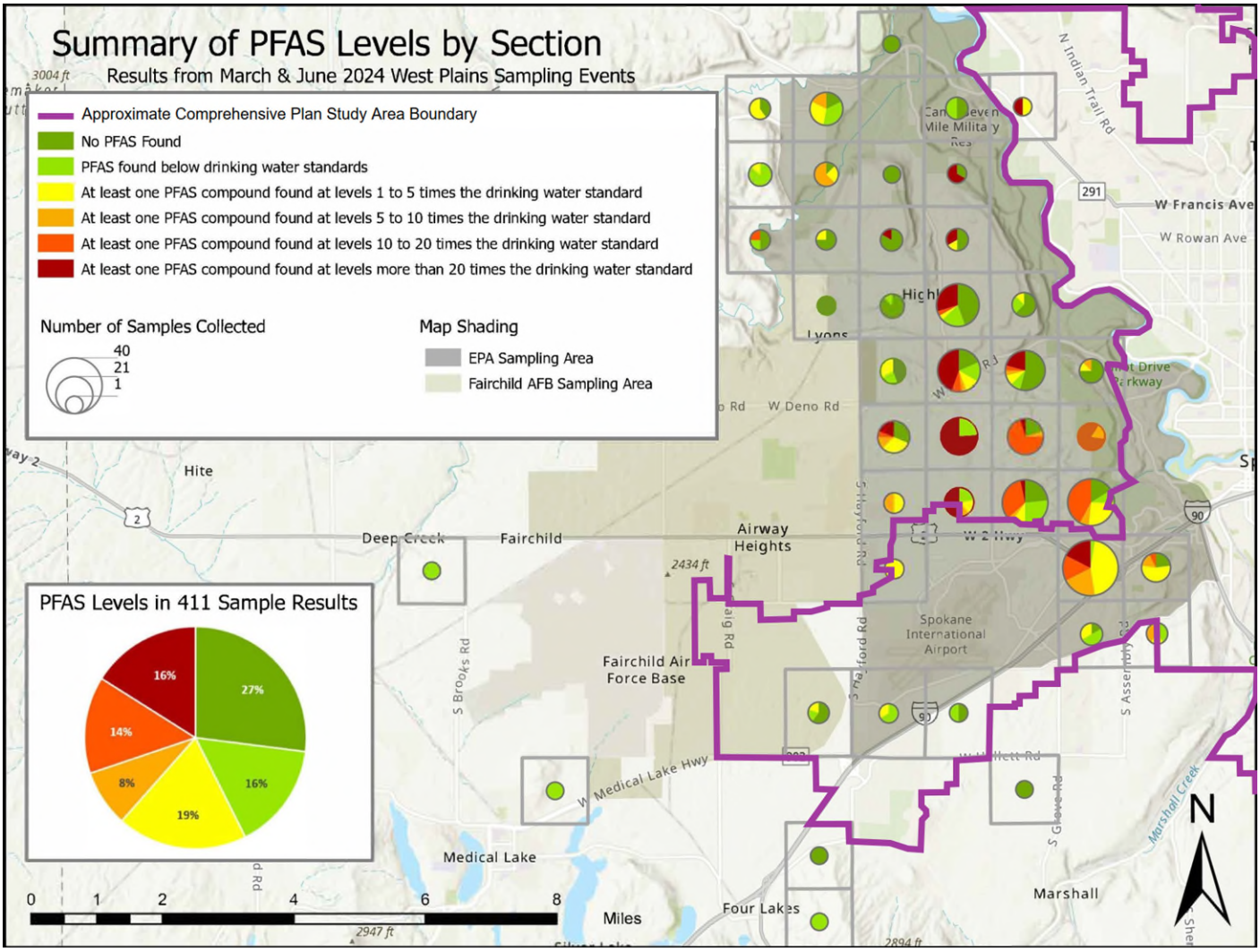
Environmental health disparities in the study area based on the Washington State Department of Health (DOH) data is shown in **Exhibit 3.1-15**. This data compares environmental and socioeconomic risk factors across all of Washington U.S. census tracts and consists of indicators like proximity to hazardous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

Exhibit 3.1-12. Groundwater Resources and PFAS Public Well Sampling Results



Sources: City of Spokane, 2025; Washington State Department of Health, 2026.
NOTE: The exhibit above was updated with the Final EIS.

Exhibit 3.1-13. West Plains Private Well PFAS Levels ~~by Location~~In and Around the Study Area



Source: Washington Department of Ecology, 2025.

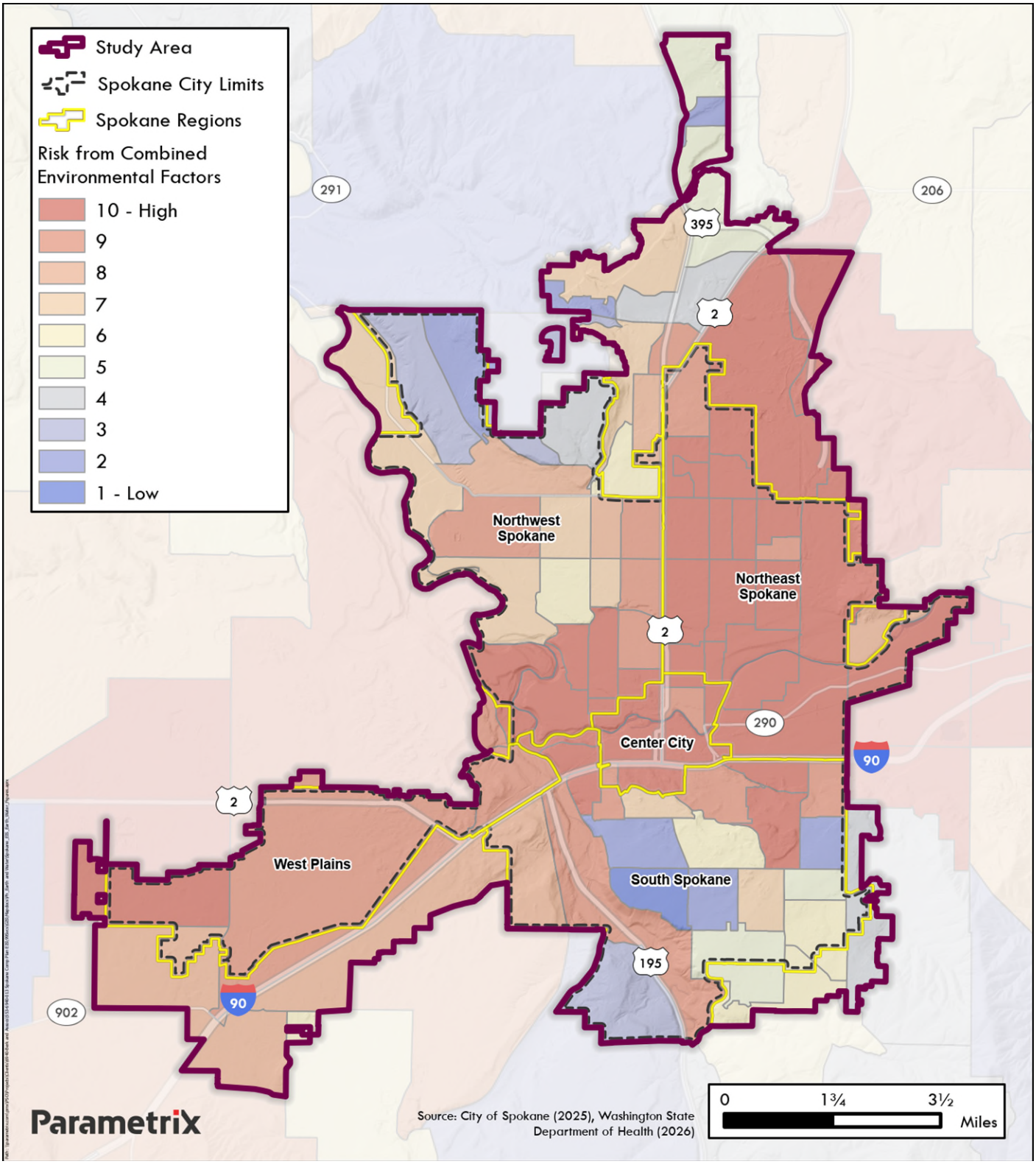
Exhibit 3.1-14. West Plains PFAS Private Well Sampling Data In and Around the Study Area

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

* Includes locations outside of Comprehensive Plan study area.

Source: Washington Department of Ecology, 2025.

Exhibit 3.1-15. Environmental Health Disparities



Source: City of Spokane, 2025; Washington State Department of Health, 2025.
NOTE: The exhibit above was updated with the Final EIS.

3.1.2 Impacts

Impacts Common to All Alternatives

This section discusses impacts to earth and water resources that are common to all alternatives. It should be noted that most impacts of future development projects on earth and water resources would be avoided or minimized through compliance with the Spokane Regional Stormwater Manual (Spokane et. al. 2008), Spokane Municipal Code (SMC) 17D.060 – Stormwater Facilities, SMC 17D.090 – Erosion and Sediment Control, SMC Title 17E – Environmental Standards (which includes the Critical Areas Ordinance and covers aquifer protection, fish and wildlife conservation areas, floodplain management, geologically hazardous areas, shoreline regulations, and wetlands protection), and other applicable federal, state, and local regulations. Details of impact mitigation are ~~discussed~~ summarized in **Exhibit 3.1-16** and discussed in **Section 3.1.3**.

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

- Construction impacts—Construction of development projects that may result from the plan alternatives would remove vegetation and/or hard surfaces, which can result in soil disturbance, erosion, water pollution, and soil contamination. In addition, vehicles, machinery, and materials brought to a construction site can introduce oil, grease, chemicals, and other pollutants that pose a risk to earth and water resources if not managed properly. Best management practices (BMPs) required by development permits to control construction activities and rainfall runoff are expected to prevent or minimize adverse impacts.
- Potential for increased pollution—Projected increases in population, jobs, and housing densities are used as indicators of increased pollution in the earth and water impacts analysis. The plan accommodation of higher populations in the urban growth center through increased jobs and housing will provide benefits to the community and protect natural resources in the region by preventing developmental sprawl in rural areas. However, increased jobs and housing can also increase impacts to earth and water resources in the city through increased vehicle use, commercial and light industrial activities that produce waste substances, landscaping with chemicals, and other pollution-generating activities. These impacts would be mitigated by the presence of stormwater runoff BMPs on roadways and other pollution-generating surfaces. A comparison of the potential for increased pollution risk to earth and water resources across the plan alternatives is presented in **Exhibit 3.1-16**.
- Potential for increased rainfall runoff flows—Changes in both housing growth and job intensity can affect impervious surfaces. However, p~~P~~rojections for increased housing provide a more direct correlation to increases in impervious surface and are used in the earth and water resources impacts analysis as indicators of increased rainfall runoff. As discussed in **Section 3.1.1**, the amount of hard surfaces versus vegetation impacts how much and how quickly rainfall runoff and pollutants may soak into the earth or are transported to natural receiving waters. A comparison of the potential for increased runoff impacts to earth and water resources across the plan alternatives is presented in **Exhibit 3.1-16**. Maps showing the housing density projections of each alternative against already developed hard surfaces are shown in **Exhibit 3.1-17** through **Exhibit**

3.1-20. Additional considerations of changes in land cover, including changes in vegetation, are discussed in **Section 3.3 Plants and Animals.**

Comparison of Impacts

Environmental Impacts

A comparison of the plan alternatives is presented in **Exhibit 3.1-16**. Maps showing the density projections of each alternative against already developed hard surfaces are shown in **Exhibit 3.1-17** through **Exhibit 3.1-20**.

Environmental Justice Implications

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

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

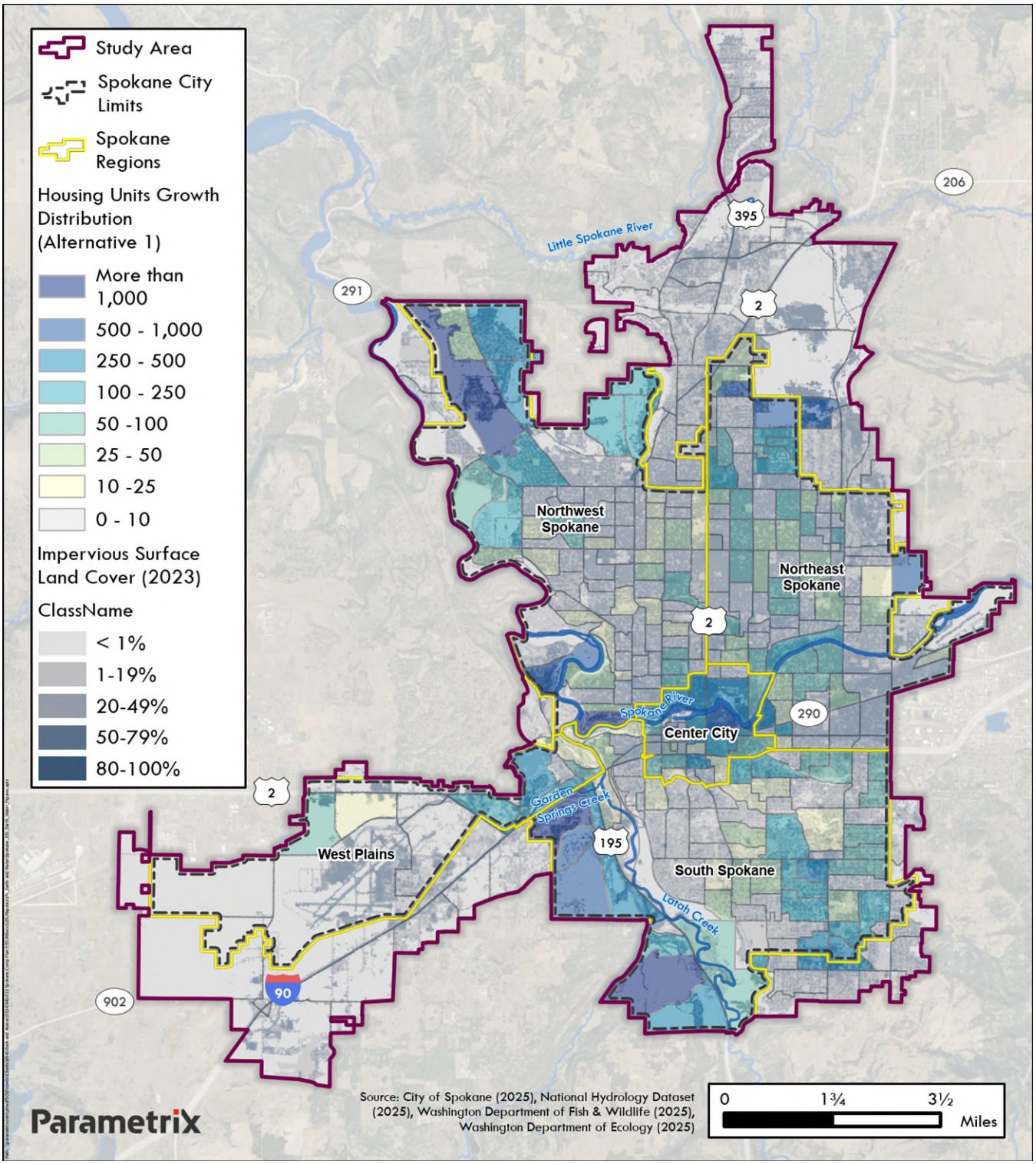
Exhibit 3.1-16. Summary of Impact Indicators

Impact Metric (Weight)	Alternative 1: Stay the Course	Alternative 2: Distributed and Balanced	Alternative 3: Center City and Regional Hubs	Preferred Alternative
Pollution Indicator – *Population* (~~Hi~~High)	Population target for 2022 to 2046: 25,157 to 50,650. **No difference**	Same as Alternative 1. **No difference**	Same as Alternative 1. **No difference**	Same as Alternative 1. **No difference**
Pollution Indicator - *Job Projections* (~~Hi~~Low)	*Regional (SRTC) Projection* 34,850, about 15,000 jobs above historic trend. **High impact**	*State (ESD) Projection* 24,939, about 5,000 jobs above historic trend. **Medium impact**	*Moderate-High Projection* 38,848, about 19,000 jobs above historic trend. **Highest impact**	*Regional (SRTC) Projection* 34,850, about 15,000 jobs above historic trend. **High impact**
Pollution Indicator and Flow Increase Indicator - *Density Distribution* (~~Hi~~High)	High intensity housing in Centers & Corridors and Downtown, with middle housing and single unit allowed in residential areas. Highest increased density focused on currently undeveloped areas. **Highest impacts**	Greater range of housing including low-rise, mid-rise, and mixed-use along frequent transit routes. Meets HB 1491 transit-oriented development. ~~Some~~ Medium increased density ~~focused on~~in currently undeveloped areas. **Medium impacts**	Focuses growth in major hubs, p~~P~~rioritizes low- and mid-rise housing along bus rapid transit, d ~~per HB 1491 and in targeted centers. D~~istributes neighborhood commercial. Least increased density ~~focused on~~in currently undeveloped areas. **Lowest impacts**	Focuses growth in major hubs, prioritizes low- and mid-rise housing along bus rapid transit, distributes neighborhood commercial. Medium-low increased density in currently undeveloped areas. **Med-Low impacts**

Impact Metric (Weight)	Alternative 1: Stay the Course	Alternative 2: Distributed and Balanced	Alternative 3: Center City and Regional Hubs	Preferred Alternative
Strength of Mitigation Potential – *Code Updates* (~~H~~Medium)	No comprehensive plan or municipal code updates. No new Climate Element per HB 1181. **Weakest mitigation**	Periodic updates to municipal code ~~update~~, ~~including~~ with new Climate Element per HB 1181. Also ~~and~~ critical area regulation update based on best available science. **Strong~~est~~ mitigation**	Similar to Alternative 2. **Strong~~est~~ mitigation**	Similar to Alternative 2, plus periodic updates to Comprehensive Plan and municipal code with environmental quality, climate resilience, and tree canopy focus. **Strongest mitigation**
Overall	**Highest Impacts**	**Medium/Lower Impacts**	**Lowest Impacts**	**Lowest Impacts**

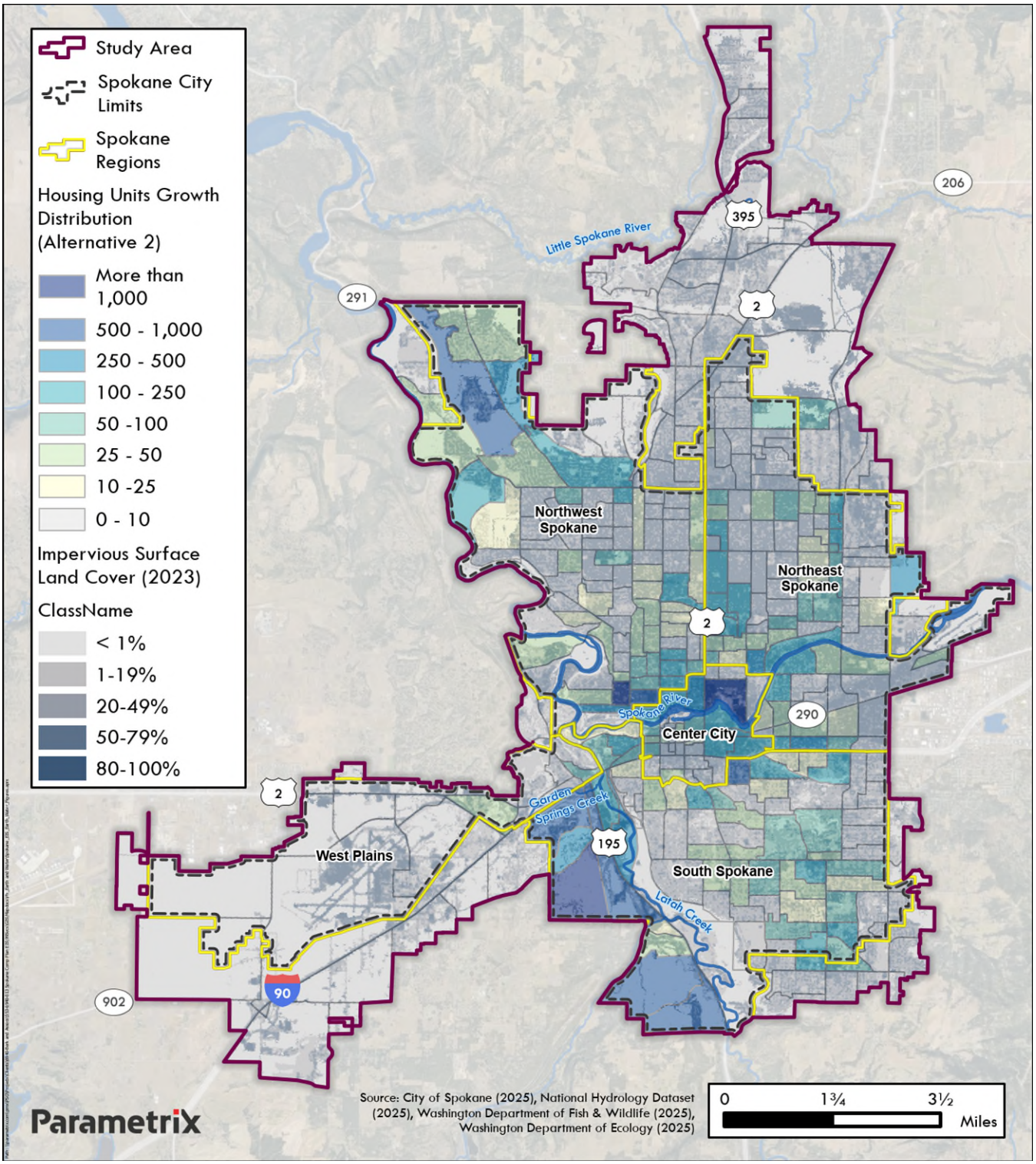
NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.

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



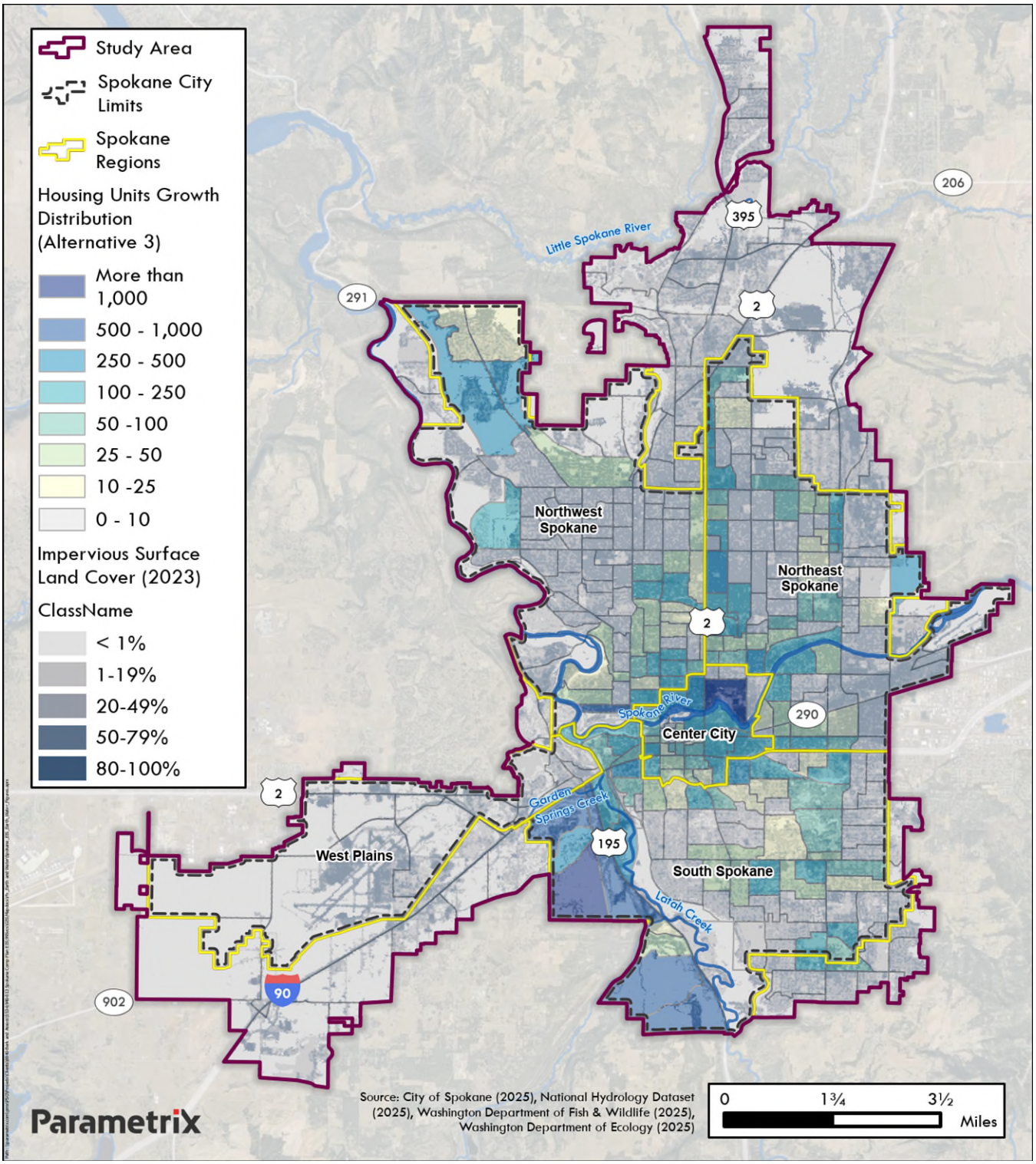
Sources: City of Spokane, 2025; National Hydrology Dataset, 2025; Washington Department of Fish & Wildlife, 2025; and Washington Department of Ecology, 2025. **NOTE:** The exhibit above was updated with the Final EIS.

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



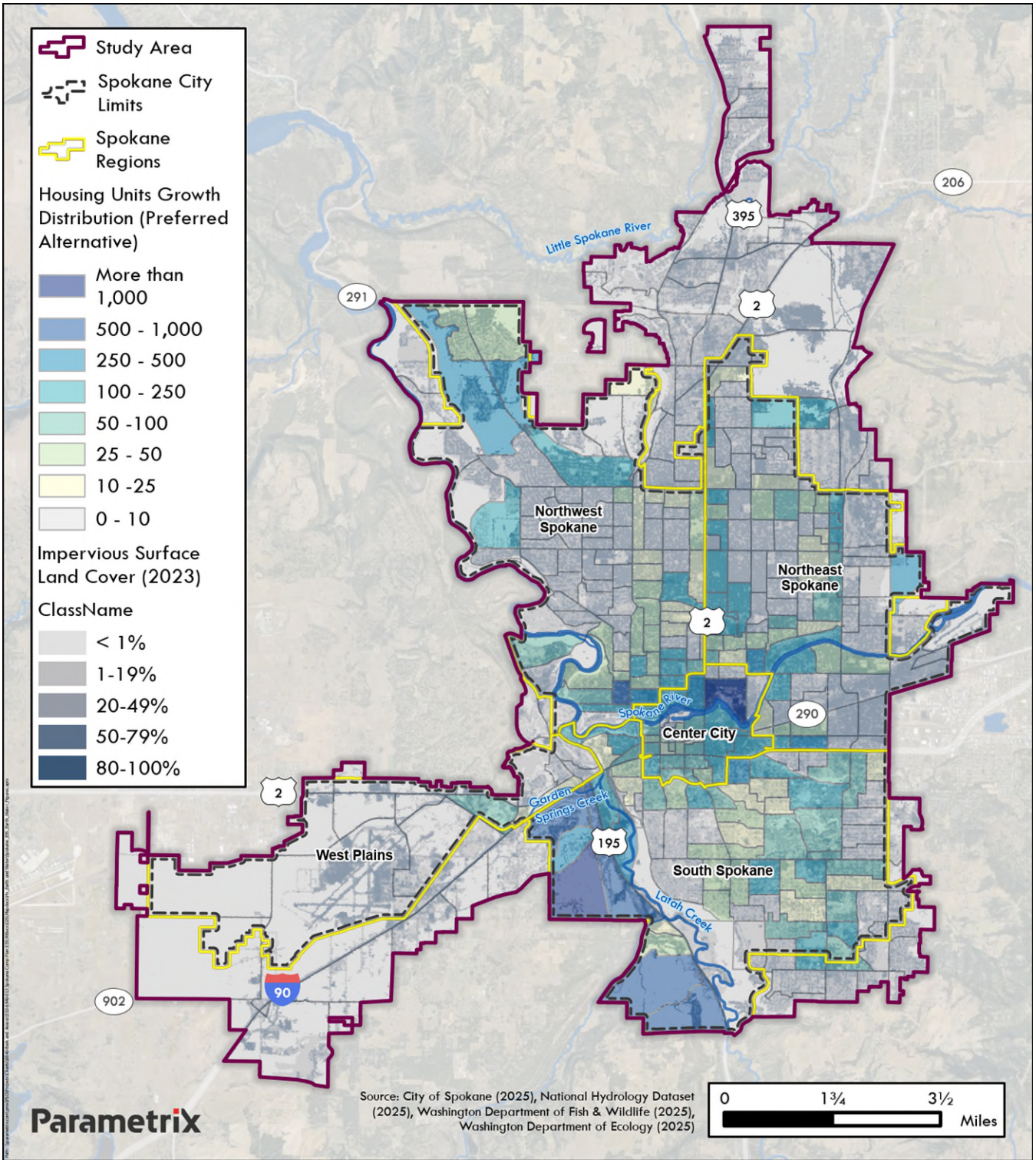
Source: City of Spokane, 2025; National Hydrology Dataset, 2025; Washington Department of Fish & Wildlife, 2025; and Washington Department of Ecology, 2025. **NOTE:** The exhibit above was updated with the Final EIS.

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



Source: City of Spokane, 2025; National Hydrology Dataset, 2025; Washington Department of Fish & Wildlife, 2025; and Washington Department of Ecology, 2025. **NOTE:** The exhibit above was updated with the Final EIS.

Exhibit 3.1-20. Existing Impervious and Forecasted Density Distribution – Preferred Alternative



Source: City of Spokane, 2025; National Hydrology Dataset, 2025; Washington Department of Fish & Wildlife, 2025; and Washington Department of Ecology, 2025. **NOTE:** The exhibit above was added with the Final EIS.

Area Specific Evaluation

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

Exhibit 3.1-21. Density Projections as Indicators of Impacts by Spokane Region

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

	Alternative 1: Stay the Course	Alternative 2: Distributed and Balanced	Alternative 3: Center City and Regional Hubs	Preferred Alternative
West Plains *(less developed)*	~~Some new density focused north of the airport.~~Highest amount of housing and job growth distributed across currently undeveloped areas.	~~Lowest amount of new density.~~Housing and job growth most focused in previously developed areas.	~~Same as Alternative 2.~~Medium amount of housing and job growth distributed across currently undeveloped areas.	Medium-low amount of housing and job growth distributed across currently undeveloped areas.

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.

Maximum Development Scenarios

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

Under maximum development scenarios, there is a greater potential for increased density – an indicator of potential impacts to earth and water resources – under both the No Action and Preferred Alternative, which have maximum potential development above the targeted growth. The Preferred Alternative could increase the capacity for housing by 17% above the No Action Alternative and increase the associated population by 14% above the No Action Alternative. The resulting increases in density would likely be focused in the Future Land Use Change areas (**Chapter 2, Exhibit 2.4-20** and **Exhibit 2.4-21**) largely along frequent transit corridors and in already developed locations. Under the Preferred Alternative, there is more opportunity to concentrate the development in the Future Land Use Map change areas that lie along corridors and hubs, which is expected to result in lesser impacts due to density distribution in already urbanized areas. Under the Preferred Alternative there would also be improved development regulations addressing critical areas and development standards (e.g. landscaping) compared with the No Action Alternative, which would help minimize or avoid impacts.

3.1.3 Mitigation Measures

Incorporated Plan Features

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

- Develop and implement climate resilience and greenhouse gas reduction goals and policies per HB 1181.
- Review and update of critical areas regulations based on best available science.
- ~~In addition to the plan features listed above, the Preferred Alternative would also include the following that would potentially help to minimize impacts to earth and water resources:~~Review and

revise development standards – design standards in particular – to make sure they are practical and achievable, adding detail to landscaping and expanding tree preservation incentives.

Regulations and Commitments

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

Federal

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

State & Regional

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

City of Spokane

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

Other Potential Mitigation Measures

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

- Install updated stormwater controls on roadways, which are not likely to be upgraded as part of the parcel redevelopments included in the alternatives.
- Prioritize opportunities to restore critical area buffers.
- Identify, protect, and restore tree canopy – specifically forested areas and especially in stream and river buffers.
- Continue advocating for projects that separate the storm drainage system from the combined sewer system, which may reduce combined sewer overflows during heavy rainfall events. See **Section 3.9** for additional discussion of combined sewer overflows.
- Avoid adding or expanding roadways through transit and other approaches.
- Continue to follow-up on recommendations of recent environmental code audit (Spokane, 2025) to review Spokane Municipal Code Section 17E.010 Critical Aquifer Recharge Area for additional protections, such as addressing demands on aquifer for uses as temperatures increase.
- Continue partnering with local governments and academic institutions to support ongoing study and monitoring of earth and water resources in the study area.
- Continue implementing public education and involvement campaigns to promote public understanding and empowerment to protect and improve earth and water resources in the study area.

3.1.4 Significant Unavoidable Adverse Impacts

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

3.2 Air Quality and Greenhouse Gas Emissions

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

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

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

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

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

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

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

3.2.1 Affected Environment

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

Regulatory Overview for Pollutants of Concern

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

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

Particulate Matter

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

Ozone

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

Carbon Monoxide

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

Nitrogen Dioxide

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

Sulfur Oxides

Sulfur Oxide (SO_2) is a colorless gas produced by burning fossil fuels containing sulfur, like coal and crude oil. Exposure to SO_2 can impair ecosystem function and cause harm to respiratory systems—particularly for children, older adults, and those with preexisting health conditions. In Washington

state, industrial facilities such as fossil fuel power plants, aluminum smelters, oil refineries, pulp mills, ~~and~~ ships and locomotives are major contributors to SO_2 emissions (EPA, 2025).

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

Lead

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

Regional Greenhouse Gas Emissions

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

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

Communitywide emissions totaled 2,283,457 metric tons of carbon dioxide equivalent ($MTCO_2e$) in 2022, while government operations produced 148,058 ~~metric tons of carbon dioxide equivalent (~~$MTCO_2e$ in 2022 – approximately 6.5% of communitywide emissions (City of Spokane, 2025). Energy use (48%) and transportation (41%) contribute to the majority of GHG emissions across the community and also contribute to criteria air pollutants of primary concern, including particulate matter and ozone (Spokane Regional Clean Air Agency, 2025). Within government operations emissions, solid

waste operations were the largest source of emissions (73%) since they include the emissions from the disposal of City and County municipal solid waste. This includes the City's Waste to Energy (WTE) facility, the North and South Side landfills, and grid electricity and natural gas consumption within facilities used for solid waste operations (City of Spokane, 2025).

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

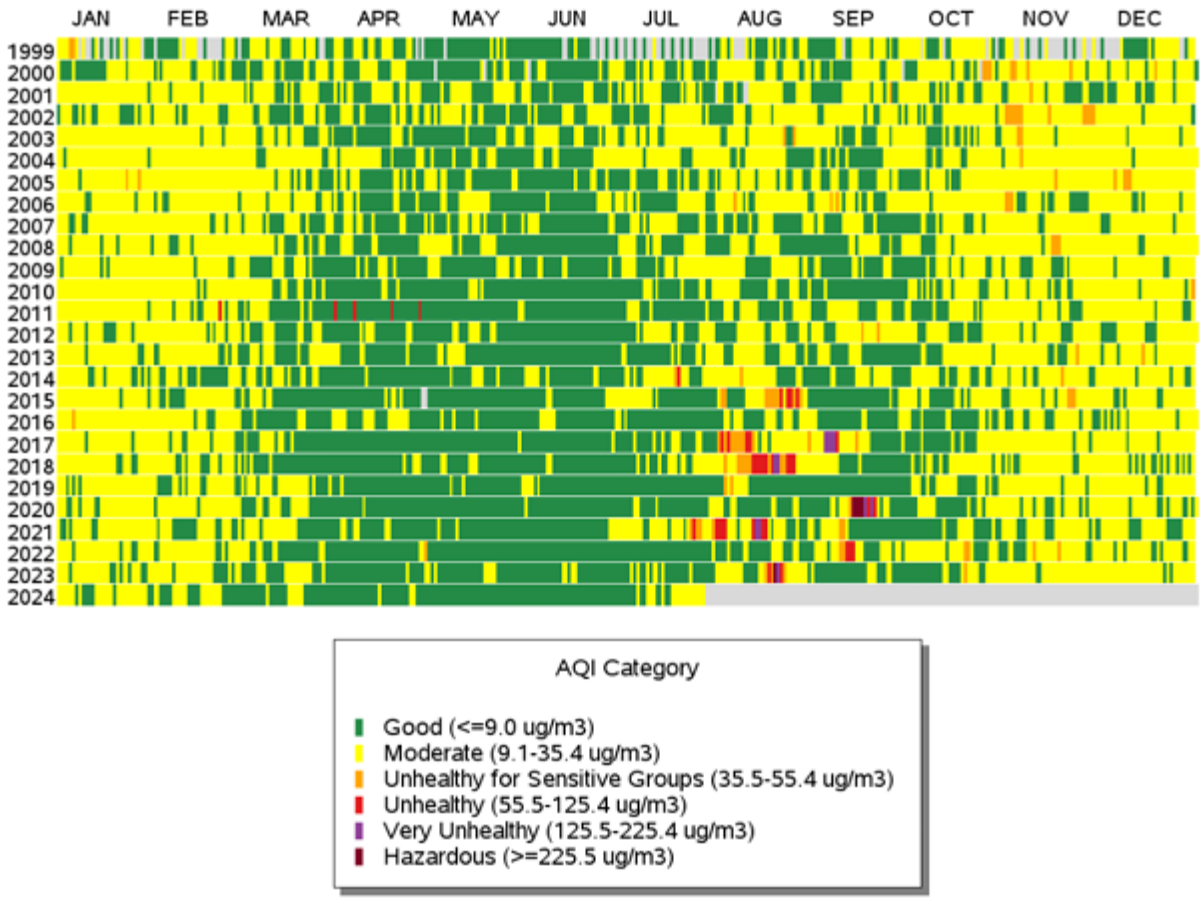
Regional Air Quality Monitoring Data

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

In 2024, ~~63~~75% of the year had "Good" AQI and another 24% had "Moderate" AQI, while just two days were categorized as "Unhealthy for Sensitive Groups." The highest daily AQI of 2024 was 106 on November 9 (Spokane Regional Clean Air Agency, 2025).

Although poor air quality is generally uncommon in the region, recent years have experienced periods of elevated pollution lasting consecutive days (EPA, 2024). See **Exhibit 3.2-1**.

Exhibit 3.2-1. PM2.5 AQI index from 1999 to 2024 in the Spokane-Spokane Valley region.

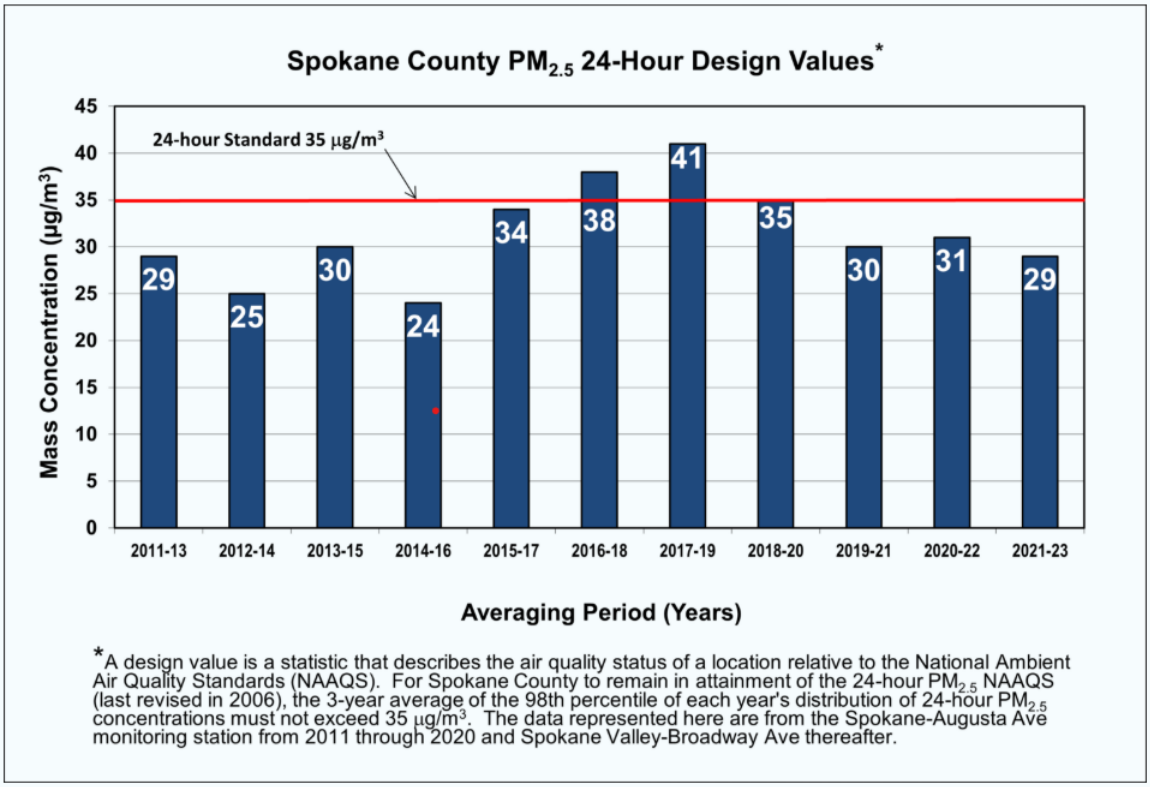


NOTE: The exhibit above was added with the Final EIS.
Source: (Spokane Regional Clean Air Agency, 2025)

In Spokane County, SRCAA continuously monitors three ambient air pollutants of primary concern, including fine and coarse particulate matter ($PM_{2.5}$ and PM_{10}) and ground-level ozone (O_3). Fine particles ($PM_{2.5}$) are 2.5 microns in diameter or less and are formed during the burning process, while PM_{10} are larger, coarse particles measuring 10 microns in diameter or less, such as dust (Spokane Regional Clean Air Agency, 2025). The health-based standard for both $PM_{2.5}$ and PM_{10} is a 24-hour average, measured from midnight to midnight. $PM_{2.5}$ standard is 35 micrograms per cubic meter of air, and PM_{10} is 150 micrograms per cubic meter of air. If the daily average concentration of either pollutant goes above these limits, it may pose a risk to public health—especially for sensitive groups like children, the elderly, and people with heart or lung conditions. **Exhibit 3.2-2** shows Spokane's $PM_{2.5}$ concentrations exceeded the health-based standard from 2016 to 2019 but have since been reduced (Spokane Regional Clean Air Agency, 2025) . The exceedances are linked to a rise in wildfire

activity and smoke events, which began increasing around 2015 and peaked in severity during the 2020 and 2021 wildfire seasons.

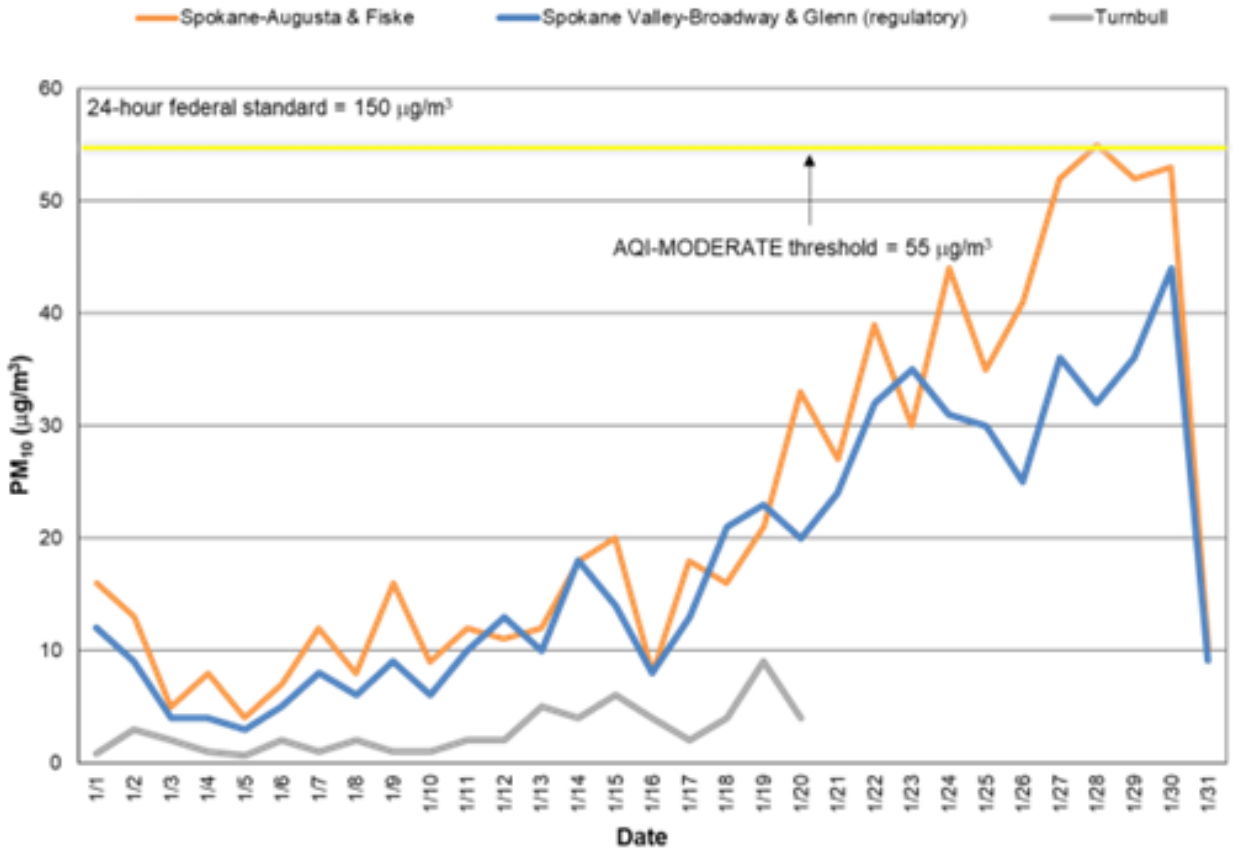
Exhibit 3.2-2. Spokane County $PM_{2.5}$ Trends, 2011-2023



Source: SRCAA Air Pollutants and Trends, 2025.

~~In Spokane County,~~ PM_{10} concentrations typically ~~fall~~ remain below EPA standards, as shown in **Exhibit 3.2-3**~~,~~; however, the region occasionally experiences elevated PM_{10} levels, such as those observed in January 2025~~which shows the most current data on countywide PM_{10} concentrations in May of 2025~~.

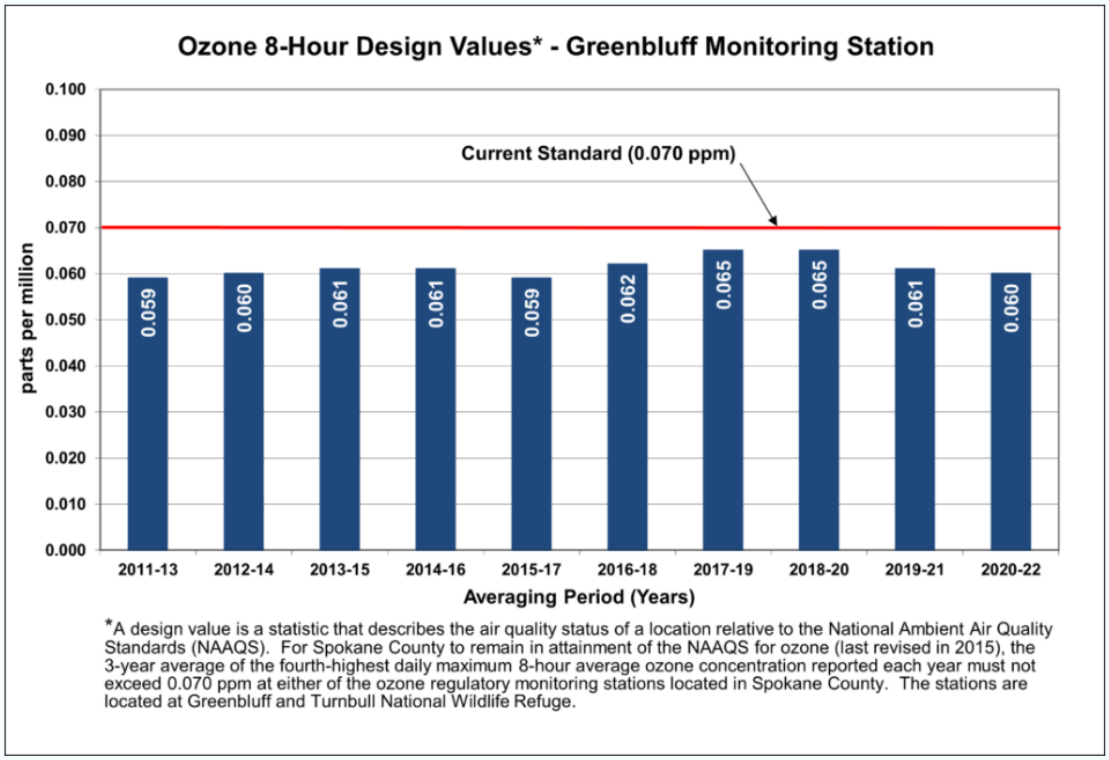
Exhibit 3.2-3. Daily 24-hour Average PM_{10} for All Spokane County Monitoring Stations, ~~May 2025~~ January 2025.



NOTE: The exhibit above was updated with the Final EIS.
Source: (Spokane Regional Clean Air Agency, 2025).

Ozone in the upper atmosphere, known as the stratosphere, protects people, wildlife, and ecosystems from harmful ultraviolet rays, while ozone in the lower atmosphere—even in small concentrations—can have serious health implications. This ground-level ozone becomes a health concern during the hot summer months, when photo-chemicals react with volatile organic compounds, nitrogen oxides, and sunlight and heat. The EPA established the 8-hour health-based standard for ozone at 0.070 ppm in 2015. **Exhibit 3.2-4** shows Spokane County's ozone concentration trends from 2011 to 2022, which consistently remained below 0.070 ppm.

Exhibit 3.2-4. Spokane County Ozone Trends, 2011-2022



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

Air Quality Permitting Requirements

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

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

Annual Registration Programs

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

Notice of Construction (NOC) Permits

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

Air Operating Permits (AOP)

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

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

Burn Permits

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

Prevention of Significant Deterioration (PSD)

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

General Order of Approval

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

Climate and Air Quality

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

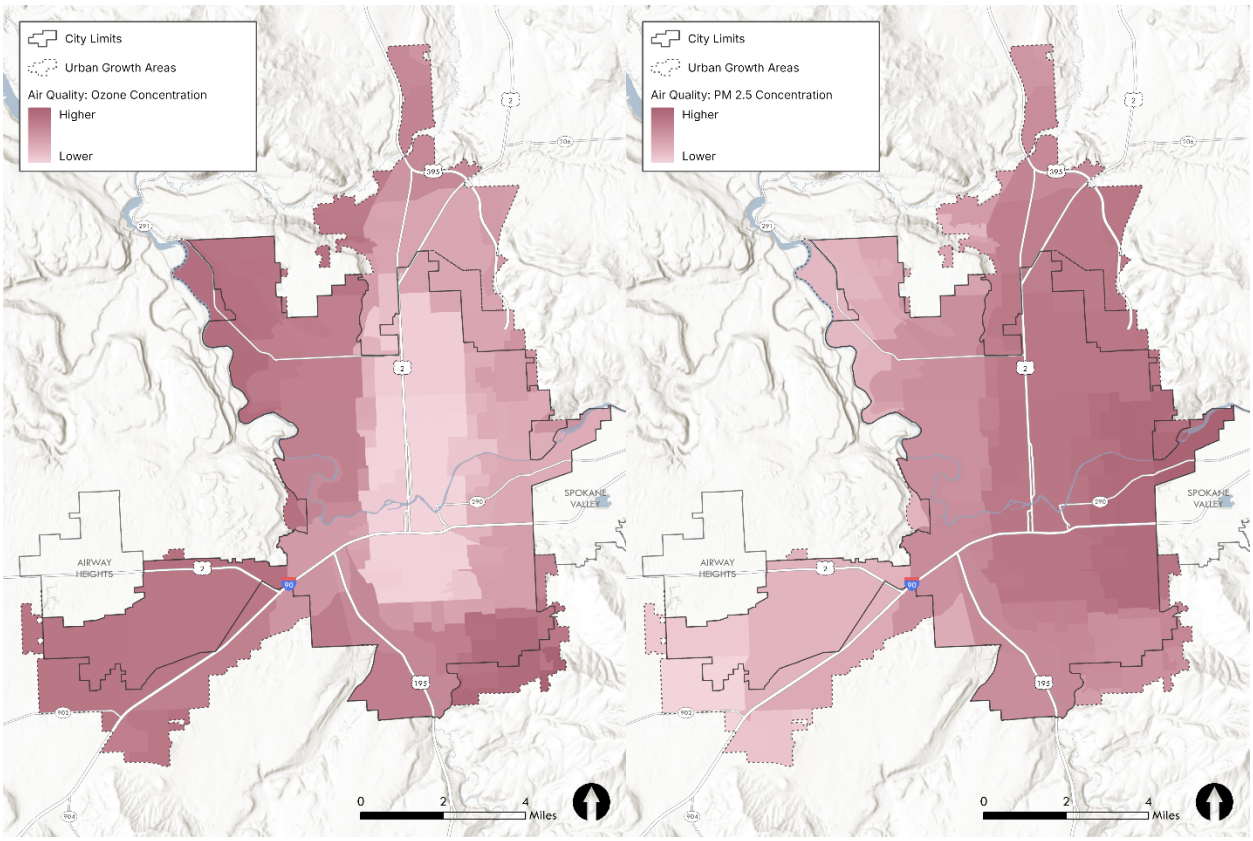
~~Spokane is situated on the Columbia Plateau in northeastern Washington, near the foothills of the Rocky Mountains to the north and east, and with the Cascade Mountains to the west. The area's climate is semi-arid, characterized by dry, hot summers and cold winters with occasional snowfall.~~ During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

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

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

Exhibit 3.2-5 shows relative exposures to $PM_{2.5}$ and ozone across Spokane. Average levels of $PM_{2.5}$ exceed the U.S. EPA's recommended level of 9.0 micrograms per cubic meter across nearly all of Spokane, though ozone levels are significantly below the EPA's recommended threshold. As the Spokane region continues to experience population and economic growth, GHG emissions from natural gas combustion and transportation, as well as concentrations of criteria air pollutants, are expected to increase.~~As the Spokane region experiences continued growth in population and economic activity, GHG emissions and levels of criteria air pollutants are expected to rise.~~ The increased emissions will amplify climate hazards, such as extreme heat, wildfires, and wildfire smoke, posing serious and widespread risk to public health and safety. While climate and air quality hazards will impact all of Spokane's community members, vulnerable populations and overburdened communities concentrated in neighborhoods along the I-90 corridor, Northeast Spokane, South Hill, and the area where the North Spokane Corridor is currently under development, will continue to be disproportionately impacted.

Exhibit 3.2-5. Relative exposure to ozone (left) and $PM_{2.5}$ (right) in Spokane.



Source: Spokane Climate Vulnerability Index, 2025.

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

Data and Methods

Greenhouse Gas Emissions

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

The project team collected data from the following sources:

- U.S. Energy Information Administration
- Spokane 2022 GHG Inventory
- Spokane Regional Transportation Council
- Census American Community Survey

~~EPA GHG Emission Factors Hub~~

- U.S. Energy Information Administration Residential Fuel Usage in Homes by State
- U.S. Energy Information Administration Electricity Consumption in Homes by Region
- Spokane 2022 GHG Inventory
- American Community Survey U.S. Census Bureau, House Heating Fuel
- Washington State Office of Financial Management Postcensal Estimates of Housing Units
- EPA GHG Emission Factors Hub

NOTE: Hyperlinks above were added with the Final EIS.

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

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

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

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

Other Pollutants

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

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

NOTE: Hyperlinks above were added with the Final EIS.

3.2.2 Impacts

Land use changes, including urban development and deforestation, can also impact air quality and climate by altering natural carbon sinks, increasing VMT, and reducing vegetation that helps filter air pollutants. The following section provides an overview of how air quality might change across the three alternatives based on the results of the air quality analysis.

Impacts Common to All Alternatives

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

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

Air Quality Impacts

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

Wildfire and Particulate Matter Exposure

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

Spokane's vulnerable populations are less able to avoid, prepare for, or recover from wildfire and wildfire smoke events. Tribal members, low-income households, ~~Tribal members,~~ houseless individuals, and those with chronic health conditions are more likely to live in areas with higher $PM_{2.5}$ concentrations and have less access to clean indoor air, healthcare to address impacts from poor air quality, and transportation to leave the region during smoke events. As wildfires increase in frequency and intensity, disparities in exposure and resilience will continue to grow and compound existing health and climate justice issues.

Geographic Concentrations of Risk

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

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

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

- *Northwest Spokane:* Overall, Northwest Spokane's Climate Vulnerability Index (CVI) ranges from very low to very high, with very high areas concentrated in the central and northeastern part of the

area. Northwest Spokane also has higher exposure rates to $PM_{2.5}$ in its eastern half and CO in its western half. CO in Northwest Spokane is particularly high compared to other areas of the city.

- *Northeast Spokane:* In Northeast Spokane, the CVI also ranges from very low to very high, but most of this area is high or very high, with very high concentrated in the northeastern part. This area also has higher land surface temperatures in the summer compared to Northwest Spokane and South Spokane. $PM_{2.5}$ exposure levels are generally high across Northeast Spokane when compared to the other study areas, and are highest in the eastern part of the area. CO exposure levels are low in the western portion of Northeast Spokane, but higher in the eastern half.
- *Division Corridor:* In the Division Corridor, the CVI ranges from very high to very low, with most areas ranging from moderate to very low. However, the corridor has higher land surface temperatures in the summer when compared to Northeast Spokane and South Spokane. $PM_{2.5}$ exposure is higher along the corridor than in many other parts of the city, while CO is generally low compared to the rest of the city.
- *Center City:* Overall, Center City's CVI is mostly very low, with a small area being low in the southern part and very high in the northeastern part. $PM_{2.5}$ exposure is higher across Center City, while the exposure level for CO is low.
- *South Spokane:* In South Spokane, the CVI is mostly very low, with very high being located around Highway 195 and just south of I-90 in the northeastern part of the area. $PM_{2.5}$ exposure levels range from low to high compared to the rest of Spokane, with the highest levels being in the northeastern part of the city. CO, on the other hand, is highest in the southern and western parts of the area.
- *West Plains:* The CVI in West Plains is very low; however, this area has some of the city's highest land surface temperatures during summer and has high exposure levels of CO.

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

Greenhouse Gas Emissions Impacts

Despite higher VMT when compared to the 2024 baseline, all alternatives show a net decrease in transportation emissions by 2046. This reduction is primarily driven by statewide policy assumptions, including the 2035 ban on internal combustion engine sales and the 2030 clean-electricity mandate. When modeled with a 15-year vehicle lifespan (full EV Adoption), these policies result in faster paced vehicle turnover and substantial emissions reductions (**Exhibit 3.2-6)**.

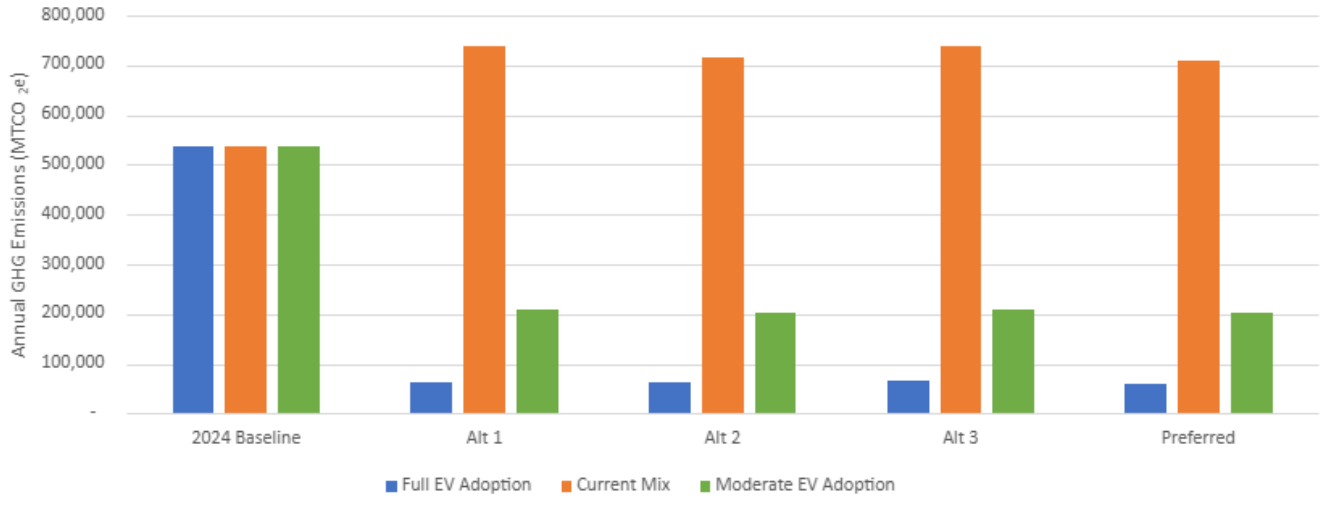
Exhibit 3.2-6. Transportation Emissions Summary (MTCO2e).

Assumption	2024 Baseline	2046 ALT 1	2046 ALT 2	2046 ALT 3	2046 Preferred ALT
Full EV Adoption	535,500	63,971	61,949	64,791	60,215
Moderate EV Adoption	535,500	210,139	203,279	210,647	201,192
Current Mix	535,500	738,370	714,036	737,853	710,512

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Source: Cascadia Consulting Group, 2025.

~~To account for potential differences in EV adoption, two additional scenarios were evaluated: a moderate EV adoption case using a 25-year vehicle lifespan, which may model Spokane's typical vehicle replacement patterns more accurately, and a scenario in which today's internal-combustion vehicle mix remains unchanged~~ While clean electricity and vehicle electrification are key to emissions reductions across all alternatives, two additional scenarios were evaluated to account for potential differences in EV adoption. The first assumes moderate EV adoption using a 25-year vehicle lifespan, which may more accurately reflect Spokane's typical vehicle replacement patterns. The second assumes that today's internal-combustion vehicle mix remains unchanged. (**Exhibit 3.2-7**)

Exhibit 3.2-7. Emissions from community transportation under three scenarios: one with full EV adoption (assuming a 15-year vehicle lifespan), one in which the current internal-combustion vehicle mix remains constant, and one with a moderate EV adoption rate (assuming a 25- year lifespan).



NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Source: Cascadia Consulting Group, 2025.

Citywide differences in emissions across the alternatives are relatively small; however, the alternatives have differing local implications for air quality and other impacts at the neighborhood scale.

The 2030 clean-electricity mandate significantly reduces community energy emissions across all alternatives when compared to the 2024 baseline largely due to clean electricity. **Exhibit 3.2-8** summarizes projected 2046 energy emissions for each alternative.

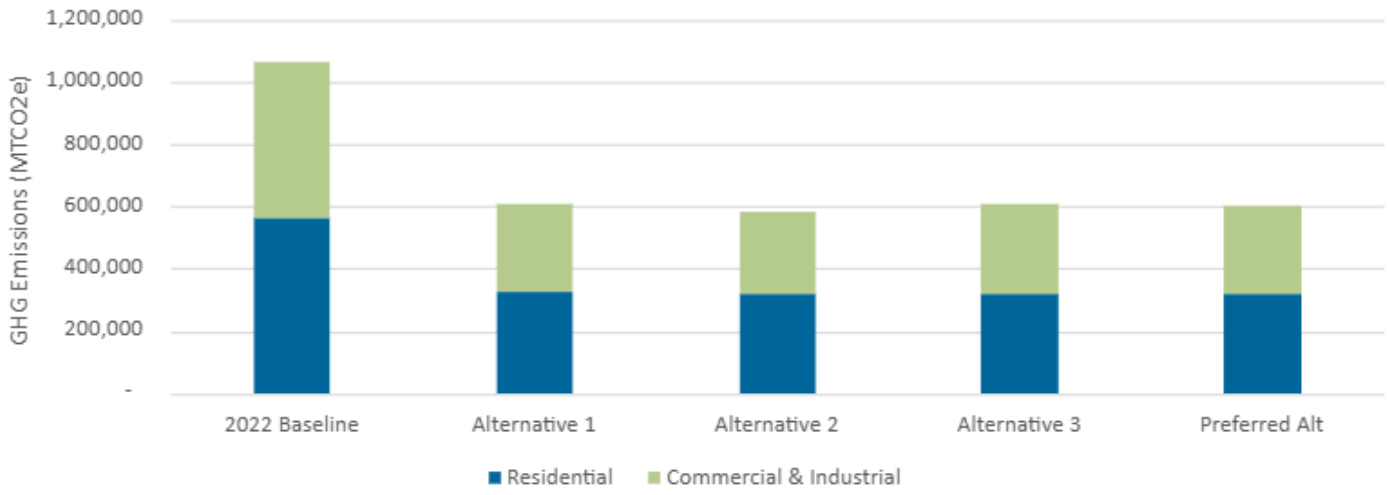
Exhibit 3.2-8. Energy Emissions Summary ($MTCO_2e$).

2022 Baseline	2046 ALT 1	2046 ALT 2	2046 ALT 3	Preferred ALT
1,061,743	609,942	582,691	611,011	602,546

NOTE: The Preferred Alternative and 2022 baseline were added to the exhibit above with the Final EIS.
Source: Cascadia Consulting Group, 2025.

Differences in energy emissions between the three growth alternatives are driven largely by projected changes in residential housing stock and employment capacity (**Exhibit 3.2-9**).

Exhibit 3.2-9. Emissions associated with each alternative, by sector.



NOTE: The Preferred Alternative and 2024 baseline were added to the exhibit above with the Final EIS.
Source: Cascadia Consulting Group, 2025.

Alternative 1: No Action, Stay the Course

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

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

Alternative 2: Distributed and Balanced

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

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

Alternative 3: Center City and Regional Hubs

Alternative 3 results in emissions lower than Alternative 1, but slightly higher emissions than Alternative 2. Energy emissions are influenced by the highest projected employment capacity among all alternatives, although the emphasis on multifamily housing alleviates overall energy demand relative to Alternative 1.

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

Preferred Alternative

NOTE: *Analysis for the Preferred Alternative was added below with the Final EIS.*

The Preferred Alternative produces the lowest transportation-sector emissions and the second-lowest energy-sector emissions among the alternatives. Prioritizing public transit and concentrating housing growth in major city hubs along bus rapid transit corridors reduces VMT, which in turn lowers transportation emissions. Although the Preferred Alternative has the same projected employment capacity as Alternative 1, it results in lower energy-sector emissions because it includes a greater proportion of multifamily housing.

Maximum Development Scenarios

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

Both the No Action and Preferred Alternatives have greater capacity for housing and population than expected in the 20-year period. Growth targets are based on allocations of growth under the State

OFM's medium (most likely) forecast. Under maximum development scenarios, housing capacity is greater than 20-year housing growth targets under the No Action Alternative (39% capacity above target) and the Preferred Alternative (63% of capacity above target). If the pace of growth is much greater than the most likely housing and associated population targets, there could be greater increases in greenhouse gas emissions. There would be more households using energy. There could be increases in transportation emissions, however these would be at least partially offset by statewide policy assumptions. More housing and population could be exposed to air pollution along heavily travelled roads.

Considering the differences in land capacity, under the maximum development scenarios, the Preferred Alternative could increase the capacity for housing in Future Land Use Change areas (**Chapter 2, Exhibit 2.4-20**) above the No Action Alternative by 17% and associated population by 14%, largely along frequent transit corridors and in already developed locations, which would reduce the need for vehicular travel and support reduced VMT.

The City will monitor greenhouse gas emissions and VMT every five years per GMA requirements (RCW 36.70a.130(9)) and can adaptively manage its plans, policies, regulations, and actions to reduce emissions and promote multimodal travel and reduced VMT.

3.2.3 Mitigation Measures

Incorporated Plan Features

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

The City regularly prepares GHG inventories consistent with SMC 15.05.060 addressing City operations and community based emissions. The reports account for emission reductions that result from policies implemented and enforced by the State of Washington and the United States, along with measures undertaken pursuant to City ordinances and policies to reduce emissions. The 2022 inventory identifies a number of City operation strategies implemented and it identifies community emissions and recommendations to address projected gaps towards achieving goals such as implementing VMT reduction and decarbonization policies.

The Draft Comprehensive Plan[1] Transportation Element Appendix identifies effective VMT reduction strategies and policy recommendations incorporated into the proposed Comprehensive Plan periodic update.

The action alternatives include new climate policies addressing GHG and VMT reduction and Resilience. Draft goals and policies include but are not limited to:

- Goal: GS-3, Accommodating Housing Capacity and Policy: GS-3.2, Access to Transportation addressing location of housing in proximity to transit.
- Goal: GS-6, Transit-Oriented Development and policies addressing GHG and VMT reduction.
- Goal: DP-3 Sustainable Development support decarbonization such as reusing or retrofitting older buildings to reduce carbon emissions. For example, Policy DP-3.1 addresses building an energy code amendments to reduce energy and fossil fuel use.
- Goal: NE-2, Water Conservation and Goal: NE-4, Clean Air and Goal: NE-9, Natural Areas and policies addressing water conservation, tree canopy, habitat, and other techniques to improve resilience.
- Goal: NE-4 Clean Air addresses clean heating sources, facility review of air quality, and vegetation that improves air quality.
- Policy: PR-3.5, Community Gardens and Policy: PR-6.3, Park Equity and Investments addressing food systems and green infrastructure and shade.
- Goal: TR-9, Achieve Climate Goals and policies addressing transportation demand management, parking management, and other approaches to GHG and VMT reduction.
- Goal: CH-10, Emergency Management and policies addressing emergency evacuation routes, emergency information and education, resilience hubs, and more.
- Goal: CF-3, Climate Resiliency, Sustainability, and Equity with policies addressing resiliency and mitigation related to water, stormwater, waste, GHG reporting, and more.

The Draft Community Indicators chapter includes several monitoring metrics regarding GHG and VMT reduction as well as Community Resiliency.

Regulations and Commitments

Air Quality

- NAAQS: The EPA enforces the CAA, which establishes the NAAQS for six criteria pollutants and sets emissions standards for vehicles and fuels, stationary industrial facilities, and hazardous air pollutants.

[1] See: https://my.spokanecity.org/planspokane/chapter-review/.

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

Greenhouse Gases & Climate Change

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

- It is the goal of the City of Spokane to reduce anthropogenic GHG emissions created by any activities within the boundaries of the City of Spokane from 2016 baseline levels to 45% below 2016 levels by 2030; 70% below 2016 levels by 2040; and 95% below 2016 levels and net zero emissions, by the year 2050. See SMC Section 15.05.020 Greenhouse Gas Emissions Reduction Goals.

Emergency Management and Wildfire

The City maintains a Comprehensive Emergency Management Plan (CEMP) to address how it prepares for, responds to, and recovers from emergencies and disasters. The City is part of a regional alert and notification system, Alert Spokane.

The City has conducted evacuation drills, for example in the Latah/Hangman and Eagle Ridge areas in April 2026 and developed an after action report to look at alerting, evacuation, and other aspects to improve evacuation planning. See the Incorporated Plan Features for the range of new Climate planning policies address wildfire and smoke and other hazards and adaptation measures.

Other Potential Mitigation Measures

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

Transportation-Related Emissions and Pollutants

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

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

Building-Related Emissions

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

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

- Strengthening building codes and standards, including requiring high efficiency in new construction, energy performance standards for existing buildings, and phasing out fossil fuels in new construction.
- Offering rebates, low-interest loans, or grants for equipment and retrofits or working with Avista to provide these to building owners.
- Conducting education and outreach to the public to inform them of the benefits of improving building efficiency and going electric or working with Avista on these efforts.
- ~~Offering expanded weatherization assistance programs for low-income households with partner organizations. This could include expanding programs to offer electrification options, solar panels, battery storage, or other opportunities that reduce building emissions and increase energy efficiency.~~Expand energy assistance and weatherization programs for low-income households in partnership with community organizations. Programs could provide greater access to electrification, rooftop solar, battery storage, and home improvements such as ductless heat pumps, air sealing, window upgrades, insulation, and other measures that improve energy efficiency, lower household energy costs, and reduce building emissions.

Additional Potential Mitigation Measures

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

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

- Increase education and outreach on the risks associated with air pollutants and how residents can protect themselves.

3.2.4 Significant Unavoidable Adverse Impacts

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

3.3 Plants and Animals

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

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

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

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

3.3.1 Affected Environment

General Habitat Setting

Terrestrial Habitats

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

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

Vegetation in the developed urban areas of the city is typical of urban environments, consisting largely of grass lawns, landscape plantings, and streetscape vegetation, including street trees. Parks provide blocks of vegetated open space distributed throughout the city. Tree canopy coverage varies widely among the neighborhoods in Spokane. A 2021 report by Gonzaga University found that tree canopy coverage ranged from 7.8% in the Riverside neighborhood, which spans portions of Center City and Northwest Spokane, to 38.5% in the Manito neighborhood in South Spokane. Average canopy coverage was estimated at 20% citywide (Manthey et. al. 2021).[1] The City of Spokane's Urban Forestry division sponsors a tree planting program called SpoCanopy, which has a goal of achieving 30% forest canopy coverage in every neighborhood in Spokane by 2030 (Spokane Urban Forestry, 2025).

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

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

[1] The information in this section refers to tree canopy data from years prior to the Spokane Complex Fire in 2026. The fire resulted in a major loss of tree canopy in addition to the loss of hundreds of homes and other structures in Northwest Spokane. A summary of the damage is available here: REBUILD Spokane Dashboard. The City's approach to rebuilding is found at https://my.spokanecity.org/wildfireinfo/rebuilding/. This includes resources for the urban forestry program and approaches to reforest such as with street trees.
The City can refer to pre-fire tree canopy information and results of tree and vegetation replanting post-recovery.

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

Common Name	Scientific Name	Class
Flowering Rush	*Butomus umbellatus*	A
Garlic Mustard	*Alliaria petiolata*	A
Goatsrue	*Galega officinalis*	A
Marsh thistle	*Cirsium palustre*	A
Palmer Amaranth	*Amaranthus palmeri*	A
Wild Four O'Clock	*Mirabilis nyctaginea*	A
Brown Knapweed	*Centaurea jacea*	B[1]
Garden Loosestrife	*Lysimachia vulgaris*	B[1]
Herb-Robert	*Geranium robertianum*	B[1]
Hoary Alyssum	*Berteroa incana*	B[1]
Musk Thistle	*Carduus nutans*	B[1]
Myrtle Spurge	*Euphorbia myrsinites*	B[1]
Perennial Pepperweed	*Lepidium latifolium*	B[1]
Policeman's Helmet	*Impatiens glandulifera*	B[1]
Puncturevine	*Tribulus terrestris*	B[1]
Russian Knapweed	*Rhaponticum repens*	B[1]
Saltcedar	*Tamarix ramosissima*	B[1]
Scotch Broom	*Cytisus scoparius*	B[1]
Velvetleaf	*Abutilon theophrasti*	B[1]
Wall Subgenus Hawkweed	*Hieracium (yellow-flowered)*	B[1]
White Bryony	*Bryonia alba*	B[1]
Wild Chervil	*Anthriscus sylvestris*	B[1]
Yellow Starthistle	*Centaurea solstitialis*	B[1]
Blueweed	*Echium vulgare*	B
Common Bugloss	*Anchusa officinalis*	B
Dalmatian Toadflax	*Linaria dalmatica*	B
Orange Hawkweed	*Hieracium aurantiacum*	B
Diffuse Knapweed	*Centaurea diffusa*	B
Spotted Knapweed	*Centaurea stoebe*	B
Kochia	*Bassia scoparia*	B
Leafy Spurge	*Euphorbia virgata*	B
Purple Loosestrife	*Lythrum salicaria*	B
Rush Skeletonweed	*Chondrilla juncea*	B
Scotch Thistle	*Onopordum acanthium*	B

Common Name	Scientific Name	Class
Buffalobur	*Solanum rostratum*	C
Canada Thistle	*Cirsium arvense*	C
Common Barberry	*Berberis vulgaris*	C
Hoary Cress	*Lepidium draba*	C
Oxeye Daisy	*Leucanthemum vulgare*	C

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

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

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

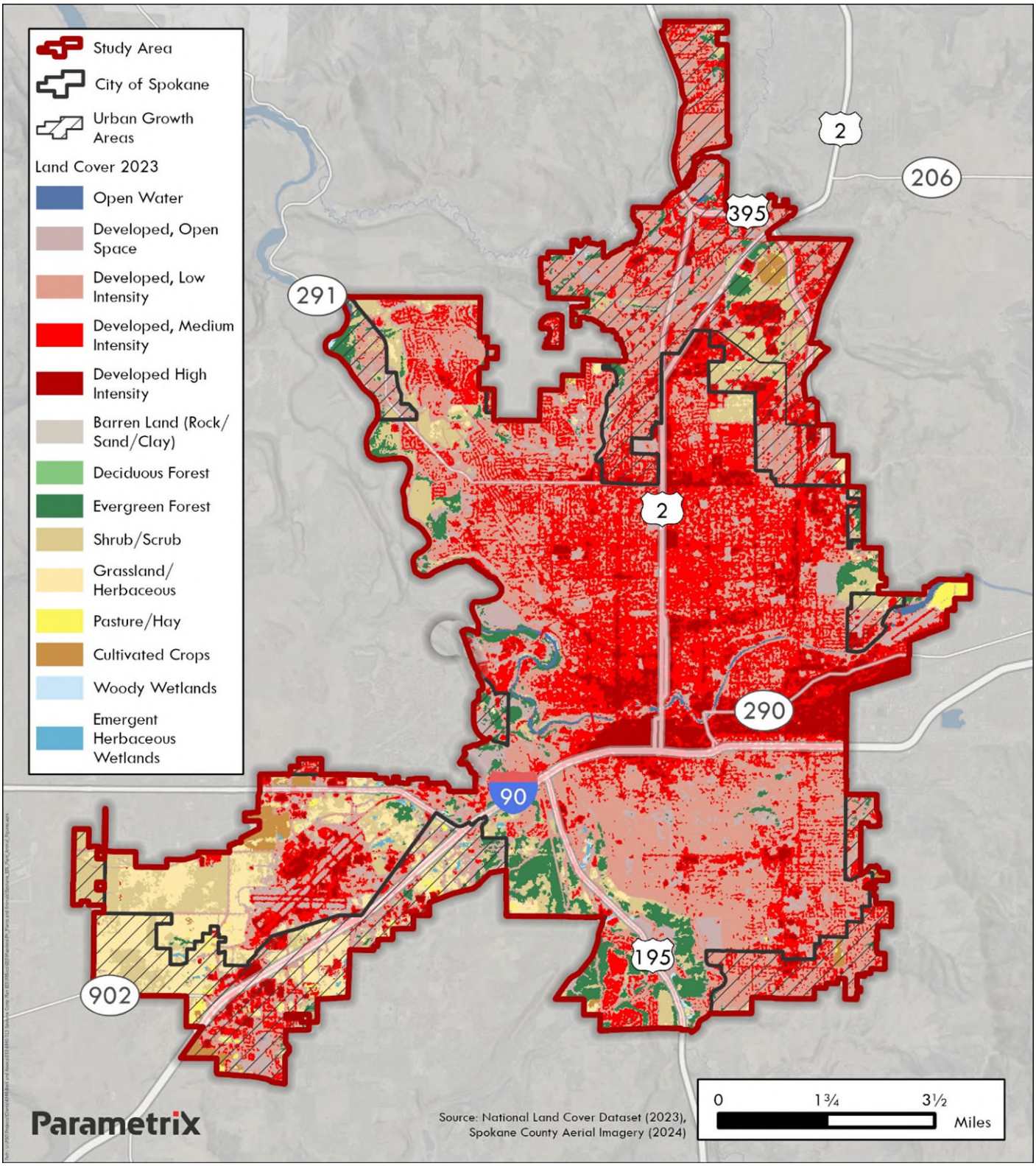
NLCD Land Cover Type	Acres	Percentage of Total Study Area
Barren Land (Rock/Sand/Clay)	0.22	0.00%
Cultivated Crops	570.89	0.89%
Deciduous Forest	1.11	0.00%
Developed, High Intensity	4796.47	7.49%

[2] Detailed definitions for the 14 NLCD land cover types identified in Exhibit 3.3-2 and shown in Exhibit 3.3-3 are incorporated by reference from the Annual NLCD Science Product User Guide (USGS 2026) and can be found at https://www.usgs.gov/centers/eros/science/annual-nlcd-land-cover-classification#overview.

NLCD Land Cover Type	Acres	Percentage of Total Study Area
Developed, Medium Intensity	18415.43	28.75%
Developed, Low Intensity	21909.67	34.21%
Developed, Open Space	5875.48	9.17%
Emergent Herbaceous Wetlands	99.25	0.15%
Evergreen Forest	3197.03	4.99%
Grassland/Herbaceous	3176.38	4.96%
Open Water	384.88	0.60%
Pasture/Hay	322.02	0.50%
Shrub/Scrub	5174.66	8.08%
Woody Wetlands	122.96	0.19%
TOTAL	**64,046.45**	**100.00%**

Source: USGS 2023.

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



Source: USGS 2023, Parametrix 2026.

Aquatic and Riparian Habitats

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

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

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

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

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

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

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

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

Shorelines

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

Wetlands

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

Floodplains

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

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

Priority Habitats

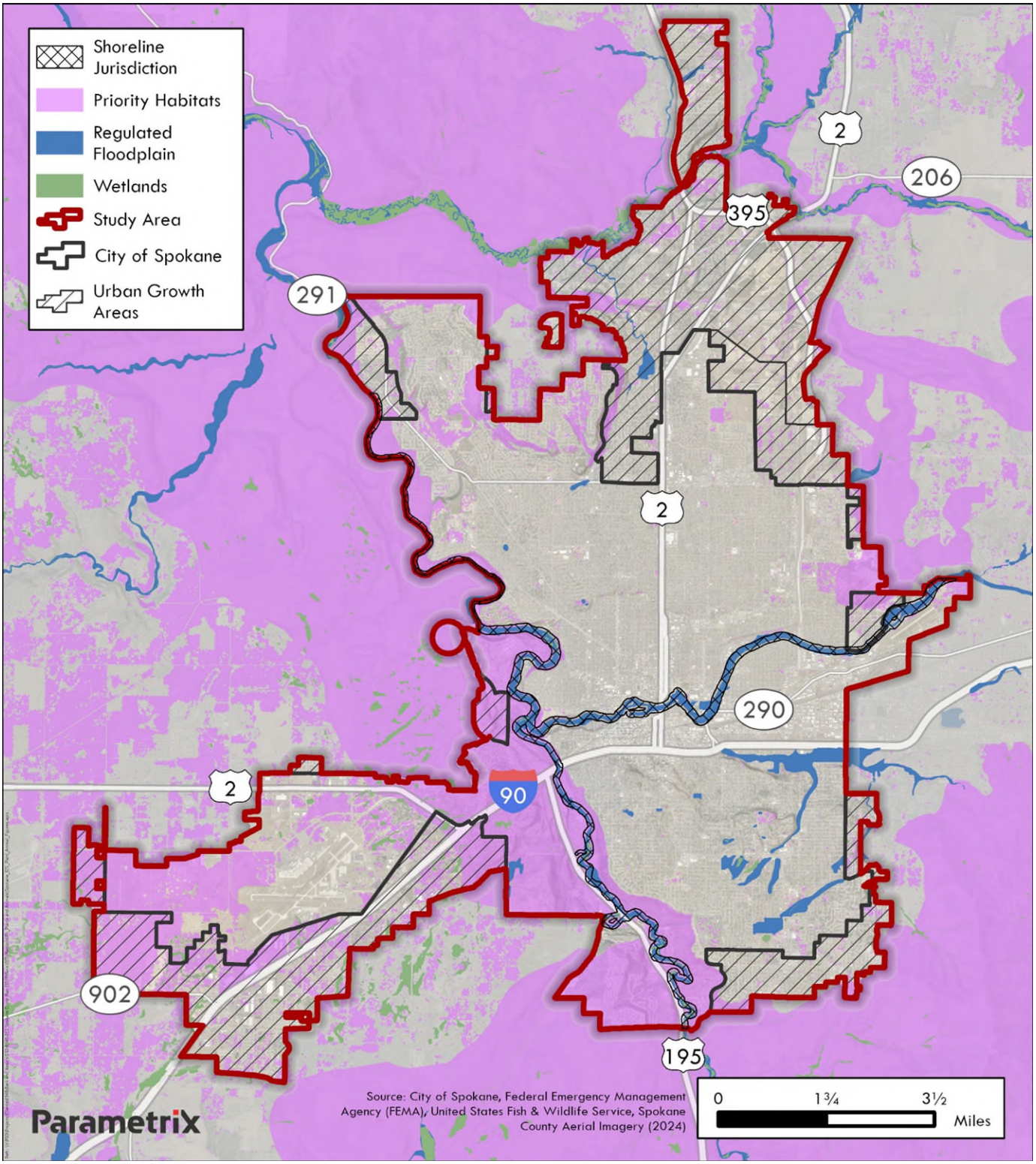
Priority habitats are identified by the Washington Department of Fish and Wildlife (WDFW) as habitat types or elements with unique or significant value to one or more species, for which special conservation measures should be taken (WDFW 2025b). A priority habitat may consist of a unique vegetation type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

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

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

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

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



Source: City of Spokane 2026, Parametrix 2026.

Locally Specific Habitat Conditions

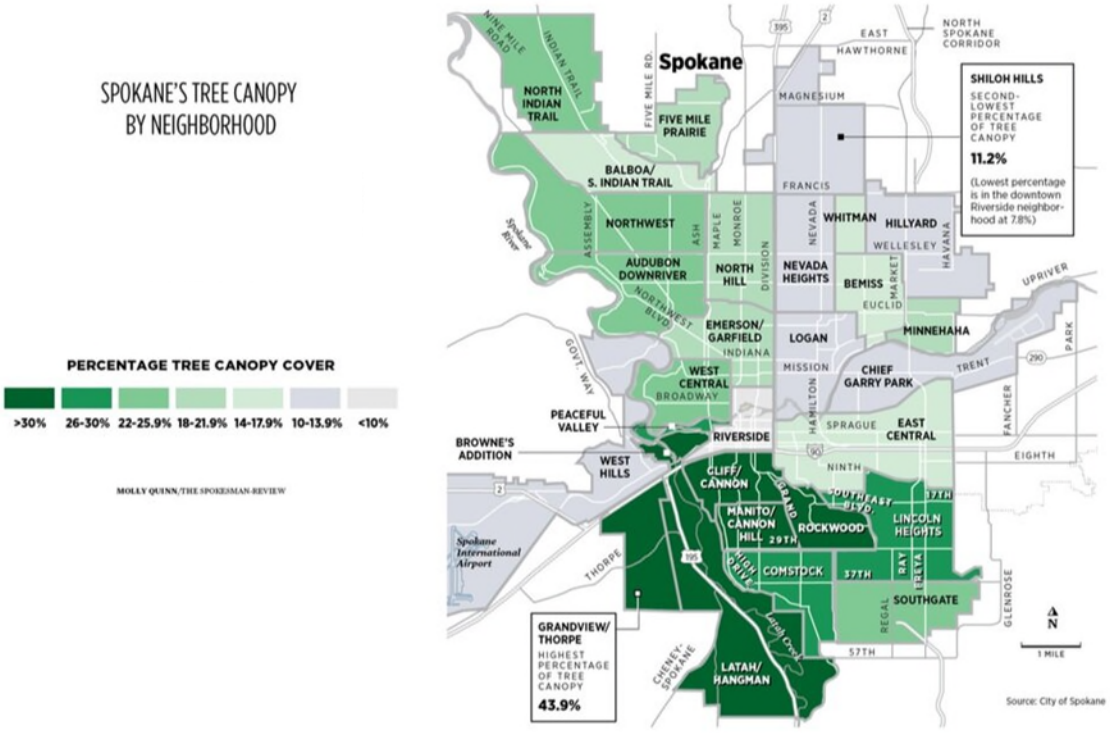
Northwest Spokane

The Spokane River forms the western boundary of most of the Northwest Spokane area (See **Exhibit 1.1-1** in Chapter 1 of this EIS). As a result, priority habitat areas, floodplains, and wetlands associated with the river extend along the west side of this region from the West Central neighborhood in the south to the northern boundary of the Northwest study area in the north. Small remnant patches of shrubsteppe of one acre or less in size are scattered throughout this region of the study area. Larger areas of shrubsteppe exist near the northern boundary of the city in the North Indian Trail and Balboa/South Indian Trail neighborhoods. Identified biodiversity areas and corridors exist in the Balboa/South Indian Trail and Five Mile Prairie neighborhoods (WDFW 2025c). Land cover types in Northwest Spokane are classified primarily as "developed, high intensity" and "developed, medium intensity" in the eastern and southern portions of the region closer to the Division Corridor and Center City. Land cover classifications transition to a higher proportion of "developed, low intensity" and "developed, open space" in the western and northern portions of this region, with patches of evergreen forest and scrub-shrub classifications along the western and northwestern perimeter (USGS 2023). Spokane City Council District 3, which is largely coterminous with Northwest Spokane, was found to have overall tree canopy coverage of 20.8% prior to the Spokane Complex Fire, roughly matching the City average. (Manthey et. al. 2021). See **Exhibit 3.3-5** and text box regarding the fire damage and recovery.

Northeast Spokane

The Spokane River passes through the southern portion of the Northeast Spokane region, forming the northern boundary of the Chief Garry Park neighborhood (See **Exhibit 1.1-1** in Chapter 1 of this EIS). There are few areas of priority habitat in Northeast Spokane, with the exception of the Hillyard neighborhood and areas adjacent to the Spokane River. No mapped waters, wetlands, or floodplains exist in Northeast Spokane, aside from those associated with the river. Land cover in this region of the study area is predominantly classified as "developed, medium intensity" interspersed with "developed, low intensity." Concentrations of "developed, high intensity" land cover types are located along the SR 290 corridor and along E Francis Avenue as it approaches the Division Corridor. Open space areas, along with small areas classified as "scrub/shrub," "pasture/hay," and "evergreen forest" are confined to the northern and eastern periphery of Northeast Spokane (USGS 2023). Spokane City Council District 1, which is largely coterminous with Northeast Spokane and has a high population with social vulnerability, was found to have the lowest overall tree canopy coverage of the city's three council districts, at 13.9% (Manthey et. al. 2021). See **Exhibit 3.3-5**.

Exhibit 3.3-5. Tree Canopy Cover by Neighborhood in the City of Spokane – 2020



Note: this map represents conditions in approximately 2020 and pre-dates the Spokane Complex Fire.
Source: (The Lands Council, 2023)

Tree Canopy & Spokane Complex Fire

The information in this section refers to 2020 tree canopy data prior to the Spokane Complex Fire in 2026. There was significant loss of tree canopy as well and numerous effects on the Spokane River and ecological systems within and adjacent to the burn area. A summary of the damage is available here: REBUILD Spokane Dashboard.

The City's approach to rebuilding is found at https://my.spokanecity.org/wildfireinfo/rebuilding/. This includes resources for the urban forestry program and approaches to reforest such as with street trees.

The City can refer to pre-fire tree canopy information and results of tree and vegetation replanting post-recovery.

NOTE: *This textbox was added with the Final EIS.*

Division Corridor

The Division Corridor extends northward from Center City, straddling the boundary between Northeast and Northwest Spokane along a major arterial corridor (See **Exhibit 1.1-1** in Chapter 1 of this EIS). The landscape is characterized primarily by low-rise urban commercial development and large paved areas. Land cover along the Division Corridor is classified predominantly as "developed,

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

Center City

Center City (See **Exhibit 1.1-1** in Chapter 1 of this EIS) is heavily developed, with low vegetative cover and low percentages of tree canopy cover compared to other study areas (USGS 2023; Manthey et. al. 2021). See **Exhibit 3.3-5**. Designated shoreline areas and FEMA regulated floodplains are present adjacent to the Spokane River. Land cover types in the Center City are predominantly classified as "developed, high Intensity" and secondarily as "developed, medium intensity." Areas classified as "developed, low intensity" and "developed, open space" exist along the Spokane River and near the Center City's southern periphery (USGS 2023).

South Spokane

The South Spokane region (See **Exhibit 1.1-1** in Chapter 1 of this EIS) contains the largest area of priority habitats among the six identified study areas of the city. Priority habitats are most heavily concentrated in the western portions of South Spokane, in the Latah/Hangman and Grandview/Thorpe neighborhoods. All of the shoreline areas, floodplains, and wetlands associated with Latah Creek are located within the boundaries of the Latah/Hangman neighborhood (WDFW 2025c; USFWS 2025a). Land cover in most of South Spokane outside of the Latah/Hangman and Grandview/Thorpe neighborhoods is classified as "developed, low intensity" and "developed, open space." Areas of relatively denser development along major roadway corridors in the Southgate, Lincoln Heights, and Comstock neighborhoods are classified as "developed, medium intensity" and "developed, high density" (USGS 2023). Large portions of the land cover in the Latah/Hangman and Grandview/Thorpe neighborhoods are classified as scrub/shrub or evergreen forest. Areas classified as "developed, medium intensity" and "developed, low intensity" are present along the US 195 corridor. Together with the West Plains region, the South Spokane region makes up Spokane City Council District 2, which was found to have the highest overall tree canopy coverage of the city's three council districts, at 24.9% (Manthey et. al. 2021). See **Exhibit 3.3-5**.

West Plains

The West Plains region contains substantial areas of mapped shrubsteppe habitat and mule deer and white-tailed deer winter range. Numerous palustrine emergent wetlands are scattered throughout the

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

Fish and Wildlife

General Wildlife

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

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

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

Fish and Aquatic Species

Streams in the study area that are recorded as fish-bearing include the Spokane River, Latah Creek, Little Spokane River, and Marshall Creek (SWIFD 2025; Visit Spokane 2025). While Latah Creek and Marshall Creek are not currently recorded to have any fish species present, the Spokane River and Little Spokane River provide habitat for a number of native and non-native fish species. Native fish documented in the Spokane River system within the study area include Westslope cutthroat trout (*Oncorhynchus lewisi*), Redband trout (*Oncorhynchus mykiss gairdneri*), Rainbow trout (*Oncorhynchus mykiss*), mountain whitefish *(Prosopium williamsoni)*, and kokanee salmon (*Oncorhynchus nerka*). Bull trout (*Salvelinus confluentus*), anadromous salmon, and steelhead were once native to the Spokane River system, but since the construction of Grand Coulee Dam on the Columbia River downstream from its confluence with the Spokane River, there is no passage for these species (WSDOT 2019). Non-native fish in the study area include game fish species such as smallmouth bass (*Micropterus dolomieu*), largemouth bass (*Micropterus salmoides*), brown trout (*Salmo trutta*), and eastern brook trout (*Salvelinus fontinalis*) (WDFW 2025e; SWIFD 2025; Spokane Water Trail 2025). The non-native northern pike (*Esox Lucius*) is classified as a prohibited aquatic invasive species in Washington. It has spread to several water bodies within the state, including the Spokane River. Northern pike represents a potential for substantial ecological and economic damage. It can live for over 20 years, grows to more than 45 pounds, produces a large number of young, and can both prey upon native salmonid species as well as outcompete them for food and habitat (WDFW 2025f).

Federal and State Threatened, Endangered, and Special Status Species

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

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

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

Priority Species	Scientific Name	Federal Status	State Status
Monarch butterfly	*Danaus plexippus*	Proposed Threatened	Candidate
Suckley's cuckoo bumble bee	*Bombus suckleyi*	Proposed Endangered	N/A
Spalding's catchfly (herbaceous perennial)	*Silene spaldingii*	Threatened	N/A
Westslope Cutthroat Trout	*Oncorhynchus clarki lewisi*	N/A	N/A
Rainbow Trout	*Oncorhynchus mykiss*	N/A	N/A
Redband trout	*Oncorhynchus mykiss gairdneri*	N/A	N/A
Big Brown Bat	*Eptesicus fuscus*	N/A	Endangered
Townsend's Big-eared Bat	*Corynorhinus townsendii*	N/A	Candidate
Western toad	*Anaxyrus boreas*	N/A	Candidate
Black-backed woodpecker	*Picoides arcticus*	N/A	Candidate
Burrowing owl	*Athene cunicularia*	N/A	Candidate
California floater mussel (mollusc)	*Anodonta californiensis*	N/A	Candidate
Shortface lanx (mollusc)	*Fisherola nuttalli*	N/A	Candidate

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

Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act

Migratory birds are federally protected under the Migratory Bird Treaty Act (MBTA), which makes it illegal to take, possess, import, export, transport, sell, purchase, barter, or offer for sale any migratory bird or eagle, or the parts, nests, or eggs of such a bird except under the terms of a valid federal permit from USFWS (16 USC 703 et seq). Bald and golden eagles, though no longer on Washington's state endangered species list, continue to be protected under the Bald and Golden Eagle Protection Act which prohibits take (defined to include pursuing, shooting, poisoning, wounding, killing, capturing, trapping, collecting, molesting, or disturbing bald or golden eagles), possession, and commerce of these species (16 USC 668-668ds). Like most of Washington, Spokane is within the Pacific Flyway, a migratory bird route that extends from Alaska to South America. Migratory birds are known to travel

through Spokane and its vicinity and use various habitats including agricultural habitats, interspersed undeveloped uplands, open space, forests and wetland areas, and aquatic habitats associated with streams and ponds. The primary nesting season for most migratory birds in Washington is from April 1 to July 1 (USDA-FSA 2018). Bald and golden eagles are both known to be present in the region surrounding Spokane, although golden eagles are encountered much more rarely. These species are likely nesting and breeding between the months of January through August (USFWS 2025b). Development activities within up to 660 feet of bald eagle nests, roost sites, or foraging areas—or up to 0.5 miles for activities producing loud intermittent noises—is required to comply with federal guidelines for bald eagle management (USFWS 2007).

3.3.2 Impacts

Impacts Common to All Alternatives

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

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

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

habitat varies among the alternatives, because the footprint of the concentrated development areas varies by alternative, but general nature of the impacts would be similar among all alternatives.

Environmental Justice Considerations

As discussed in the City's Climate Risk and Vulnerability Assessment, areas with disadvantaged populations tend to have less tree canopy cover than other areas. For these reasons, alternatives with a higher likelihood of contributing to canopy cover loss in areas with a combination of disadvantaged populations and low canopy cover would have an elevated risk of adverse effects on disadvantaged populations. Conversely, changes that allow lower-cost housing options in areas that are currently designated for low density development could allow more overburdened populations to live in areas with higher canopy cover and access to large parks. The planting of trees in rights of way and on public lands, where appropriate and managed for fire risk, along with policies that prioritize the protection, maintenance, and expansion of tree canopy in residential and mixed-use areas where tree canopy is currently low, could provide benefit to overburdened populations.

Alternative 1: No Action, Stay the Course

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

Among the ~~three~~ alternatives, Alternative 1 would concentrate the least amount of new housing in Center City and the Division Corridor, foregoing opportunities to create increased density in these currently developed areas. Alternative 1 would result in the greatest projected increase of housing units in the far northwest Spokane neighborhoods of North Indian Trail and Balboa/South Indian Trail. These neighborhoods contain substantial pockets of priority habitat, including shrubsteppe and biodiversity areas and corridors, along with wetlands, floodplains, and shoreline areas associated with the Spokane River. Alternative 1 could also potentially create greater development or human-use pressure on habitats in the Hillyard neighborhood of Northeast Spokane compared to the other

alternatives. Alternative 1 would result in a slightly greater increase in the number of housing units in the eastern portion of the Hillyard neighborhood than Alternatives 2 and 3 and the Preferred Alternative would; however, the housing in Alternative 1 is predominately single-unit dwellings, whereas under Alternatives 2 and 3 and the Preferred Alternative it would consist mostly of multi-unit development.

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

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

Alternative 2: Distributed and Balanced

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

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

accessible areas could potentially defuse some of the development pressures in less developed areas at the city's periphery.

Similar to Alternative 1, Alternative 2 would have adverse effects on plants and animals resulting from increased development. While Alternative 2 would be focused on creating increased density in already-developed areas, it would have the most diffuse and widespread footprint among the alternatives. As with Alternative 1, existing regulations and ongoing restoration and tree-planting efforts would be expected to moderate potential adverse effects. Alternative 2 would not be inconsistent with best available science, would not have irreversible adverse effects on federally or state-listed threatened or endangered species, and would not have adverse population-level effects on important non-listed species. Alternative 2 would likely result in permanent habitat conversion. However, due to its focus on increasing existing urban density, the existing framework of federal, state, and local regulations (including the current update to the City's Comprehensive Plan) and ongoing local habitat restoration initiatives, Alternative 2 would not have effects that would be sufficient to compromise overall regional ecosystem function. As a result, Alternative 2 would result in less than significant impacts to plants and animals.

Alternative 3: Center City and Regional Hubs

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

Preferred Alternative

NOTE: *Analysis for the Preferred Alternative was added below with the Final EIS.*

The general character of potential impacts to plants and animals under the Preferred Alternative would be consistent with the impacts common to all alternatives discussed above. Development patterns and their effects under the Preferred Alternative would include a mix of elements of both Alternative 2 and Alternative 3.

Like Alternative 3, the Preferred Alternative would concentrate housing and employment growth in the Center City and University Area and focus new industrial/employment growth in the West Plains and Northeast Spokane areas. Like Alternative 2, it would also provide for greater intensity of moderate- to high-density housing and mixed-use/commercial development along frequent transit routes. However,

unlike Alternative 2, mixed-use development would be more concentrated at nodes along transit corridors rather than distributed along the full extent of the corridors.

Overall, the Preferred Alternative would take a slightly more geographically diffuse approach to housing and job growth than Alternative 3 while focusing more intensively on development in the Center City and University Area than Alternative 2. Like Alternatives 2 and 3, it would emphasize increased density within already-developed areas.

As a result, the effects of the Preferred Alternative on plants and animals would be negligibly different from Alternatives 2 and 3. While it would have adverse effects, **the Preferred Alternative would result in less than significant impacts to plants and animals.**

Maximum Development Scenarios

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

Both the No Action and Preferred Alternative have maximum potential development above the targeted growth as described in **Chapter 2**. The impacts described under Impacts Common to All Alternatives regarding the potential for alterations or loss of plant and animal habitats, and discussion associated with the individual No Action and Preferred alternatives would apply and could be accelerated if maximum growth were to occur rather than the targeted growth that is based on the State OFM's most likely growth trend.

The Preferred Alternative could increase the capacity for housing above the No Action Alternative by 17% and associated population by 14%, in the Future Land Use Change areas (**Chapter 2, Exhibit 2.4-20** and **Exhibit 2.4-21**) largely along frequent transit corridors and in already developed locations. Under the Preferred Alternative there is more opportunity to concentrate the development in the Future Land Use Map change areas that lie along corridors and hubs that have higher levels of impervious surfaces. Under the Preferred Alternative there would also be improved climate resilience and natural resources policies and development regulations addressing critical areas and development standards (e.g. landscaping) that could address impacts compared with the No Action Alternative.

3.3.3 Mitigation Measures

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

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

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

Incorporated Plan Features

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

- Develop and implement climate resilience and greenhouse gas reduction goals and policies per HB 1181. Strategies of the City's June 2025 Climate Risk and Vulnerability Assessment that could be incorporated into the element include:
  - Restore shoreline habitats.
  - Expand and manage the City of Spokane's tree canopy and provide cool corridors.
- Support connective property ownership to maintain and enhance habitat connectivity.
  - Consider a "One Health" approach to habitat management (optimize the health of people, animals, and the environment).
  - Establish development regulations that incorporate best practices for:
    - Reducing the risk of wildfires, which are a prevalent hazard in the region.
    - Mitigating the impacts of extreme heat and flooding.
  - Investigate a program for property acquisition in addition to the county level Conservation Futures program.
- Review and update critical areas regulations based on best available science. A preliminary review as part of the City's June 2025 Climate Policy Audit provided the following strengths and opportunities in the City's Critical Areas Regulations:
  - Section 17E.020 Fish and Wildlife Conservation Areas (FWCA): Spokane has fairly large riparian buffers that align well with the State Department of Fish and Wildlife's site potential tree height recommendations, which is supportive of climate planning.
  - Section 17E.020.120 Incentives and Stewardship Options for FWCA: The City could consider similar incentives (tax incentives, stewardship options) in other sections of the critical areas ordinance.
  - Section 17E.030 Floodplain Management: Consider adding development restrictions for areas within the mapped 500-year floodplain.

Regulations and Commitments

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

Federal

Endangered Species Act

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

Migratory Bird Treaty Act of 1918

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

Bald and Golden Eagle Protection Act of 1940

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

Section 404 of the Clean Water Act

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

State of Washington

Growth Management Act of 1990 (RCW 36.70A)

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

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

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

Chapter 220-610 WAC, State and Protected Species

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

Chapter 77.12.020 RCW, Wildlife to be classified

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

Chapter 77.55 RCW, Construction Projects in State Waters

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

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

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

Washington State Wildlife Action Plan

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

City of Spokane

Environmental Standards (Spokane Municipal Code Title 17E)

Spokane Municipal Code (SMC) Title 17E, Environmental Standards, provides for the protection of identified Critical Areas within the City of Spokane. Key chapters of SMC Title 17E include provisions

regulating Critical Aquifer Recharge Areas (17E.010), Fish and Wildlife Conservation Areas (areas with which priority species are associated, including important terrestrial and aquatic habitats as well as riparian areas and buffers) (17E.020), Floodplains (17E.030), Geologically Hazardous Areas (17E.040), and Wetlands (17E.070). Title 17E also includes provisions governing the administration of the city's SEPA regulations and the implementation of its Shoreline regulations.

Shoreline Master Program

The Washington Shoreline Management Act requires local governments to prepare locally relevant policies and regulations for managing shorelines though their Stormwater Master Program (SMP). The City of Spokane's SMP governs the preservation, restoration, use, modifications, and development of shoreline areas, which include the areas inside city limits that are located within 200 feet of the Spokane River and Latah Creek. Both the Spokane River and Latah Creek are designated as Shorelines of Statewide Significance, a special category of shorelines where statewide interests take priority and specific uses are preferred. The City of Spokane SMP defines how these streams' shoreline areas will be managed and includes goals, policies, development standards, and use regulations. The objectives of the City of Spokane SMP are to improve environmental quality, enhance public access and recreational opportunities, plan and coordinate development, raise development standards, and ensure that Spokane's greatest natural assets are carefully managed for the enjoyment of future generations. Spokane Municipal Code Chapter 17E.060, Shoreline Regulations, establishes the city's authority for administration and implementation of the SMP.

Other Potential Mitigation Measures

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

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

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

The City could consider opportunities to advance updates to its Shoreline Restoration Plan, which dates to 2008 and would benefit from renewal.

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

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

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

- Incorporate adaptive management into critical area and shoreline code, particularly as it relates to mitigation (17E.020.090, 17E.060, 17E.070.130). Monitoring and adaptive management is encouraged in WAC 365-195-905(6). Adaptive management is the process of monitoring and improving permits, regulations, and programs to ensure the protection of critical areas.
- Consider adding code language to the critical areas regulations that is similar to provisions contained in the shoreline regulations for limiting clearing and minimizing soil disturbance.

3.3.4 Significant Unavoidable Adverse Impacts

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

3.4 Land Use Patterns and Urban Form

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

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

3.4.1 Affected Environment

Local Policy Framework

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

Centers and Corridors Growth Strategy

The Comprehensive Plan, last amended in 2023, designates several centers and corridors throughout the city. It focuses most new development in specific areas identified on the Land Use Plan Map (**Exhibit 3.4-1**, **page 3-89**), including Neighborhood Centers, District Centers, Employment Centers, Corridors, and Downtown, which serves as the city's Regional Center.

Center and corridor land use policies promote the efficient use of land by promoting density and mixed-use development in proximity to retail businesses, public services, places of work, and transportation systems. Currently, there are 7 designated Neighborhood Centers, 7 District Centers, 6

Employment Centers, and 3 Corridors. These designated areas are intended to support a mix of uses such as higher-density housing, retail and commercial businesses, offices, and community facilities like parks, schools, and government buildings in order to create vibrant, walkable places where people can live, work, and access services.

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

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

Relevant Existing (2025) Land Use Policies

The following policies represent policies in the Shaping Spokane plan developed in 2017. They will be replaced with the updated Comprehensive Plan. They are provided for context in the Affected Environment of this section:

LU 3.2 Centers and Corridors - Designate centers and corridors (neighborhood scale, community or district scale, and regional scale) on the Land Use Plan Map that encourage a mix of uses and activities around which growth is focused.

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

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

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

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

Subarea Plans and Neighborhood Plans

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

Existing Land Use Designations and Zoning Districts

Existing Land Use Plan

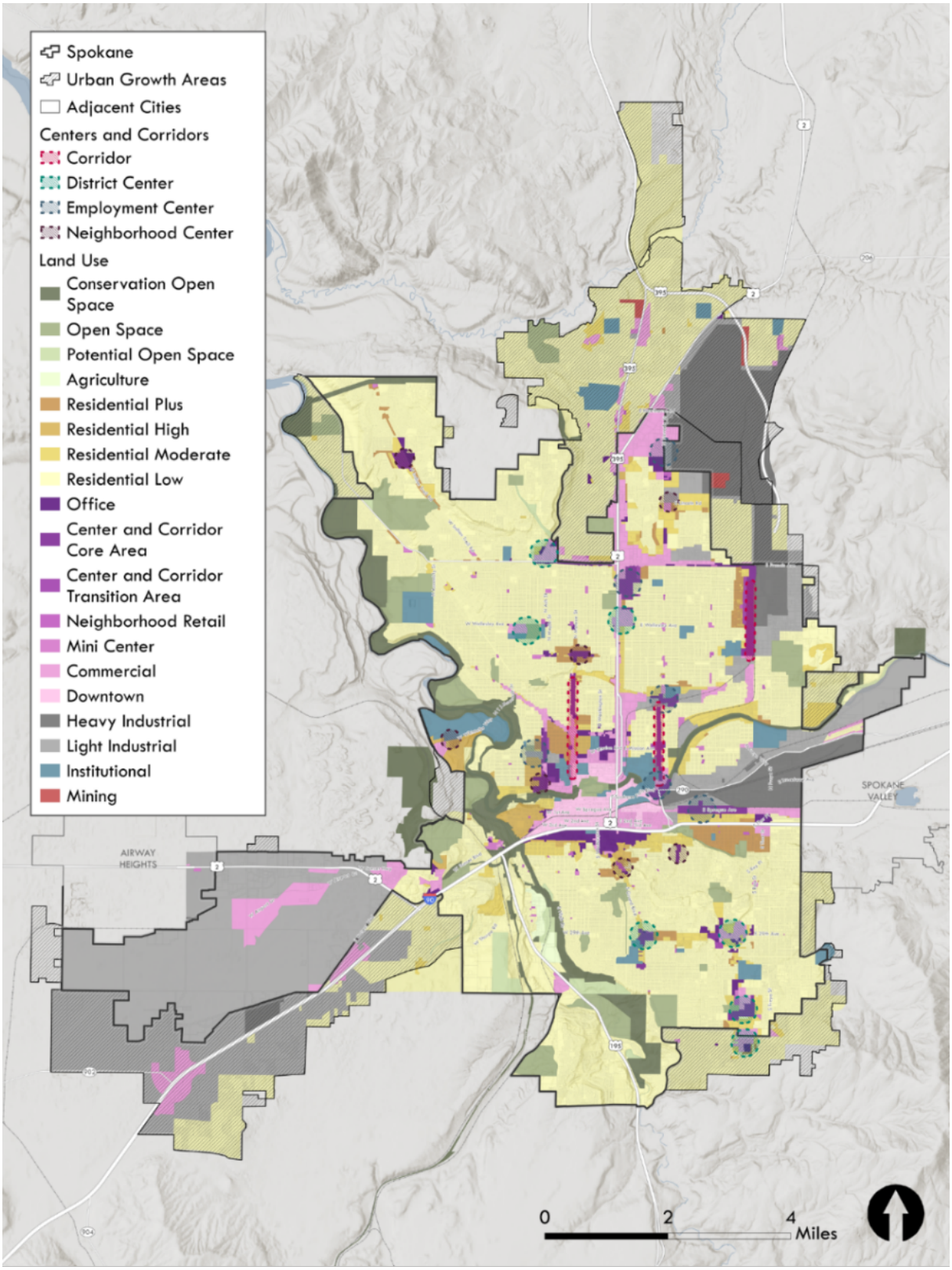
The City of Spokane covers approximately 70 square miles, with residential land use making up the largest portion (55%). Residential areas are currently categorized into three main designations: Residential 10-20 (low), Residential 15-30 (moderate), and Residential 15+ (high).

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

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

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

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



Sources: City of Spokane; BERK, 2025.

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

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

Sources: City of Spokane; BERK, 2025.

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

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

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

Sources: BERK, 2025.

Land Use Code

Zoning Districts - as of 2025

The City of Spokane utilizes a zoning code that divides the city into various districts, each with its own set of regulations for land use and development. These districts as of 2025 are categorized into Residential, Commercial, Industrial, and Mixed Use (i.e., Downtown and Centers and Corridors) categories, with further subdivisions—each tailored to accommodate different uses and development intensities. See **Exhibit 3.4-4** and **Exhibit 3.4-5**.

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

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

Exhibit 3.4-4. Existing Zoning Districts Summary Table as of 2025

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

Sources: City of Spokane; BERK, 2025.

- **Characteristics of Residential Zones as of 2025:**
  - Residential Agriculture (RA) – Low-intensity; for agriculture-related uses like farming, greenhouses, single-unit homes, and on-site product sales.
  - Residential 1 (R1) – Low-intensity; detached, attached, and middle housing at the scale/height of single-unit homes.
  - Residential 2 (R2) – Low-intensity; similar to R1 but allows slightly higher housing density.

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

- **Characteristics of Commercial Zones as of 2025:**
  - Office (O) – Low-intensity; small-scale offices in or near residential areas; designed to ~~compliment~~complement residential areas and serve nearby neighborhoods.
  - Office Retail (OR) – Higher-intensity; larger offices plus supporting retail/services; often in downtown-adjacent areas; retail limited to avoid dominating.
  - Neighborhood Retail (NR) – Neighborhood-serving, pedestrian-oriented businesses; limits on auto-oriented uses like gas stations or drive-throughs.
  - Neighborhood Mixed Use (NMU) – Similar to NR but encourages residential units alongside commercial; allows more commercial space if housing is included.
  - Community Business (CB) – Auto-accommodating commercial; wide range of local/regional retail and services; some size limits near neighborhoods.
  - General Commercial (GC) – Broadest range of retail, services, and limited industrial; industrial uses restricted in size to maintain commercial focus.

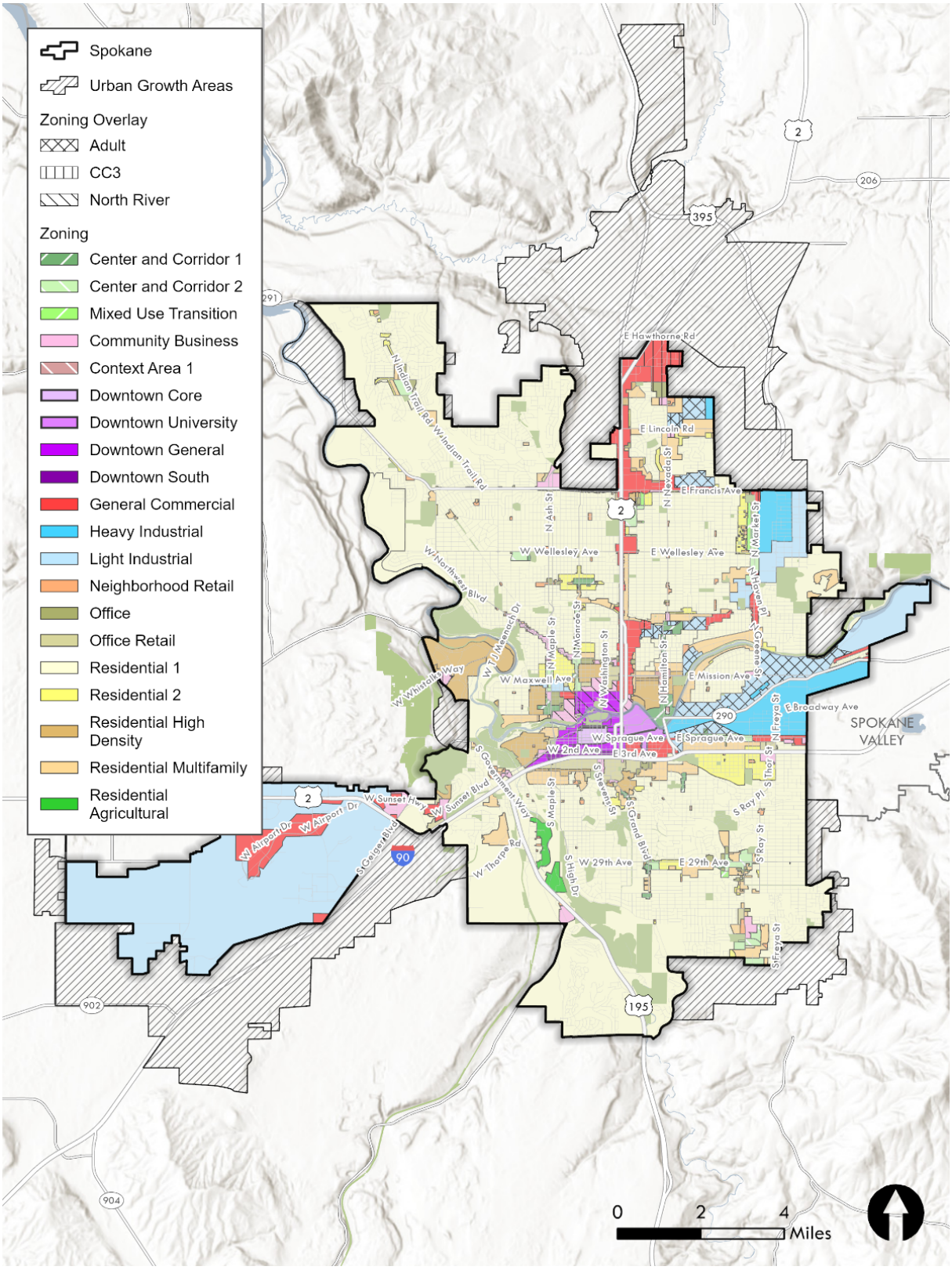
- **Characteristics of Downtown Zones as of 2025**
  - Downtown Core (DTC) – Central downtown; tallest and most intensive building heights and massing in the city.
  - Downtown General (DTG) – High-density, mixed-use; encourages retail at street level with residential/office above; wide range of uses but discourages auto-oriented and heavy industrial.
  - Downtown University (DTU) – Supports an urban university environment; promotes pedestrian-friendly spaces with a mix of residential, office, retail, and related commercial uses.
  - Downtown South (DTS) – South of the railroad viaduct; accommodates a wide mix of uses, including auto-oriented businesses.

- **Characteristics of Industrial Zones as of 2025**
  - Light Industrial (LI) – Wide range of industrial, commercial, and office uses; commercial size limited to maintain industrial focus; residential allowed near the Spokane River; minimal but safe and environmentally sound standards.
  - Heavy Industrial (HI) – Primarily high-impact industrial; allows compatible office and limited commercial; similar residential allowance near the river as LI; standards ensure safe, efficient, and functional development.

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

- **Characteristics of Centers and Corridors as of 2025**
  - These regulations carry out the Comprehensive Plan's goals for centers and corridors –areas designed to concentrate jobs, shopping, and housing in shared locations. They promote economic activity through new development and redevelopment with cohesive, mixed-use patterns, higher-density housing, street-oriented buildings, screened rear parking, pedestrian safety, alternative transportation, quality design, smaller blocks, and narrow, on-street-parking streets.
  - Zones include:
    - Type 1, 2, and 3 (CC1–CC3): Located in center and corridor core areas and core commercial areas shown on the land use plan map.
    - Type 4 (CC4): Mixed-use transition zones in designated transition areas.
    - These zones apply to properties within the plan's mapped centers and corridors. The zoning map also shows the center type: Neighborhood Center (NC), District Center or Corridor (DC), and Employment Center (EC).
    - Identified as a Center and Corridor Core Area in the Land Use Plan, the Hamilton Form Based Code in the South Logan area implements a Context Area (CA) zone and Shopfront requirements.

Exhibit 3.4-5. Existing Zoning Map as of 2025



Source: City of Spokane, 2025.

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

Exhibit 3.4-6. Zone by Acreage as of 2025

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

Source: City of Spokane, BERK, 2025.

Centers and Corridors: 2024 Assessment Study

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

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

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

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

Overlay Districts

Spokane has three major overlay zones as of 2025 that influence land use in specific areas of the city. The North River overlay zone limits the maximum floor area ratio and site coverage to protect the public's view of the Spokane River, Riverfront Park, and the Downtown core. The Adult overlay zone coincides with the area of the city where adult business may be located. Finally, the Center and Corridor (CC3) overlay zone is applied in areas near existing centers and corridors, allowing development in those areas to use either the standards of the Type 1 or 2 Center and Corridor zone or the existing underlying zone. Additionally, there are further height limitations related to the flight paths of Spokane International Airport, Fairchild Air Force Base, and Felts Field.

Urban Form Regulations

Development regulations govern what uses are permitted, as well as the physical form (such as heights and setbacks) of development, which influences the form and function of urban environments. Policies guiding height, bulk, and scale in the Land Use Element of the current Comprehensive Plan as of 2025 include:

- LU 5.5, Compatible Development: *Ensure that infill and redevelopment projects are designed to be compatible with and complement surrounding uses and building types.*
- LU 1.4: *Direct new higher intensity residential uses to areas in and around Centers and Corridors designated on the Land Use Plan Map and to areas where existing development intensity is already consistent with development of this type.*
- LU 2.1, Public Realm Features: *Encourage features that improve the appearance of development, paying attention to how projects function to encourage social interaction and related to and enhance the surrounding urban and natural environment.*
- LU 2.1, Performance Standards: *Employ performance and design standards with sufficient flexibility and appropriate incentives to ensure that development is compatible with surrounding land uses.*

Height, Bulk, and Scale

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

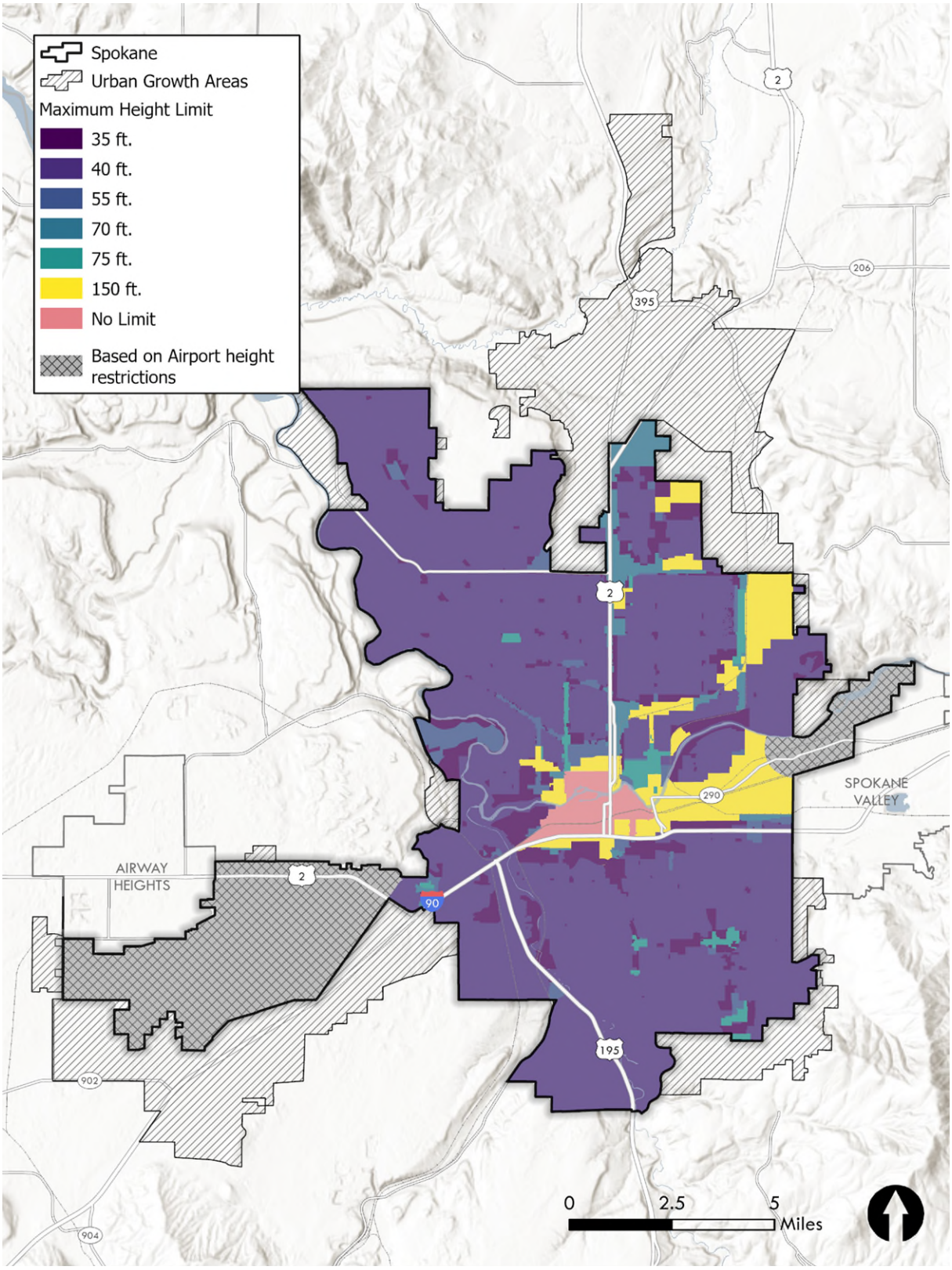
Transitions

To ensure compatibility between zones of varying intensity, the Spokane zoning code as of 2025 requires elements such as lower height limits for lots located near lower intensity residential zones. Additionally, specific zones such as Mixed-Use Transition are used to transition between higher and lower intensity areas.

Tree Canopy

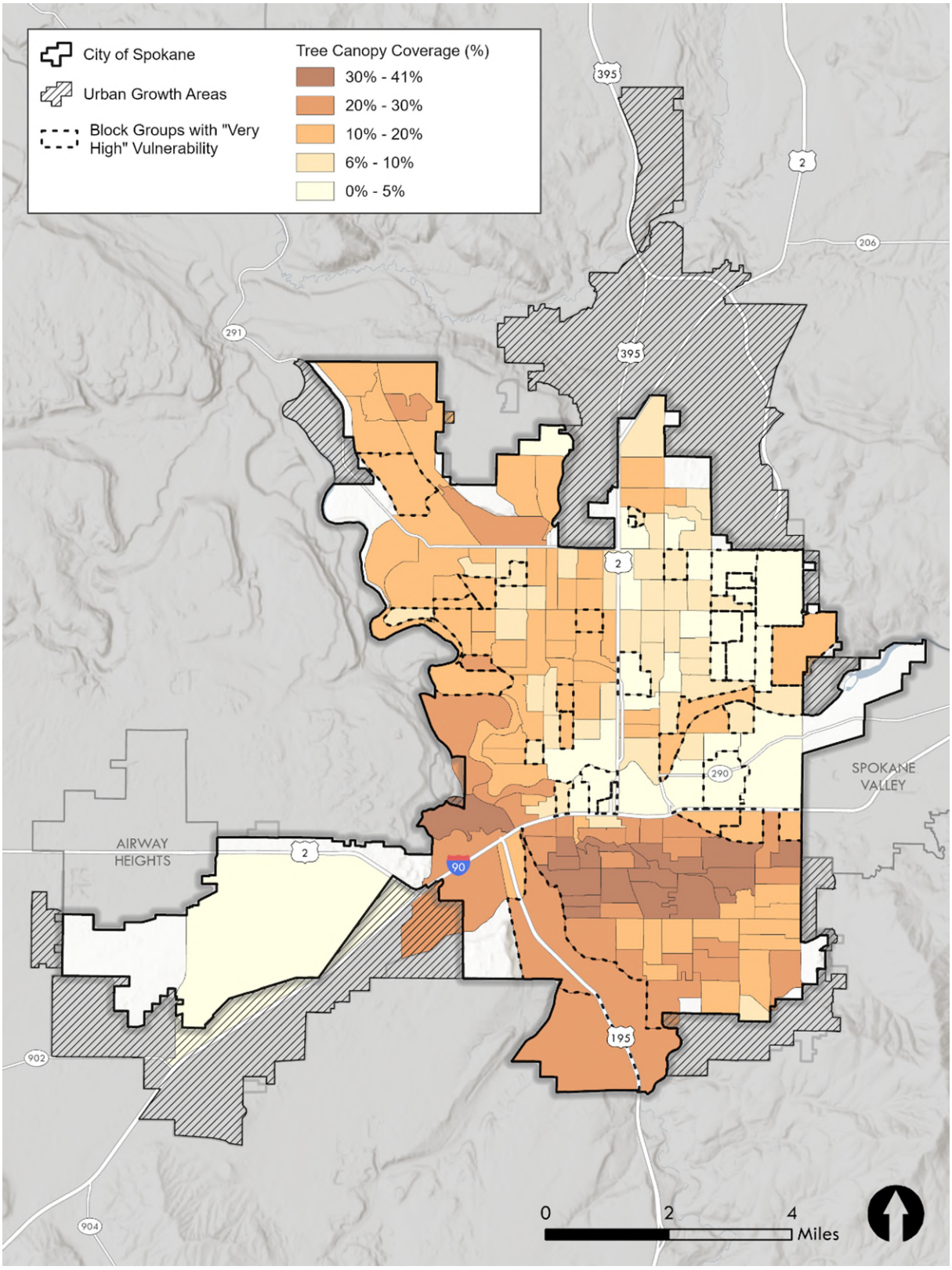
Spokane has a variety of policies intended to enhance their urban forest, reduce stormwater runoff, and provide shade and shelter. Trees are required to be planted and maintained by adjacent property owners, and enhancing the urban tree canopy is a central goal of the Spokane Comprehensive Plan. **Exhibit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

Exhibit 3.4-7. Maximum Height Limit as of 2025



Source: City of Spokane, 2025; BERK, 2025

Exhibit 3.4-8. Tree Canopy Coverage (2021)



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

Views

Maintaining views and vistas is one consideration in planning for new development in Spokane, helping to support a unique sense of place for Spokanites. Ensuring ample open space and reducing the bulk of large buildings are major parts of this. In addition, key view corridors, such as around the St. John's Cathedral at the south end of Center City, get special consideration and impact how tall nearby buildings can be. In addition, views are considered in the city's land use standards in the North River Overlay district as of 2025, which may be revised in the future:

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

Major Land Use/Development Policies and Efforts Currently Under Consideration - 2025

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

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

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

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

Transit-Oriented Development: Division Street BRT ~~& North Spokane Corridor~~: Division Bus Rapid Transit (BRT) is being planned along Division Street, expected to launch upon completion of the North Spokane Corridor. ~~in 2027–2029~~. The project includes land-use planning to support increased density along the corridor**.**

The **North Spokane Corridor (US 395 freeway)**: The freeway is also under development and is slated for completion by 2030; it includes recognizing the corridor as a ~~multi-modal~~ freeway with shared transit, bike, and pedestrian facilities.

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

Land Use Patterns and Current Conditions

Overview of Historical Planning and Land Use Patterns

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

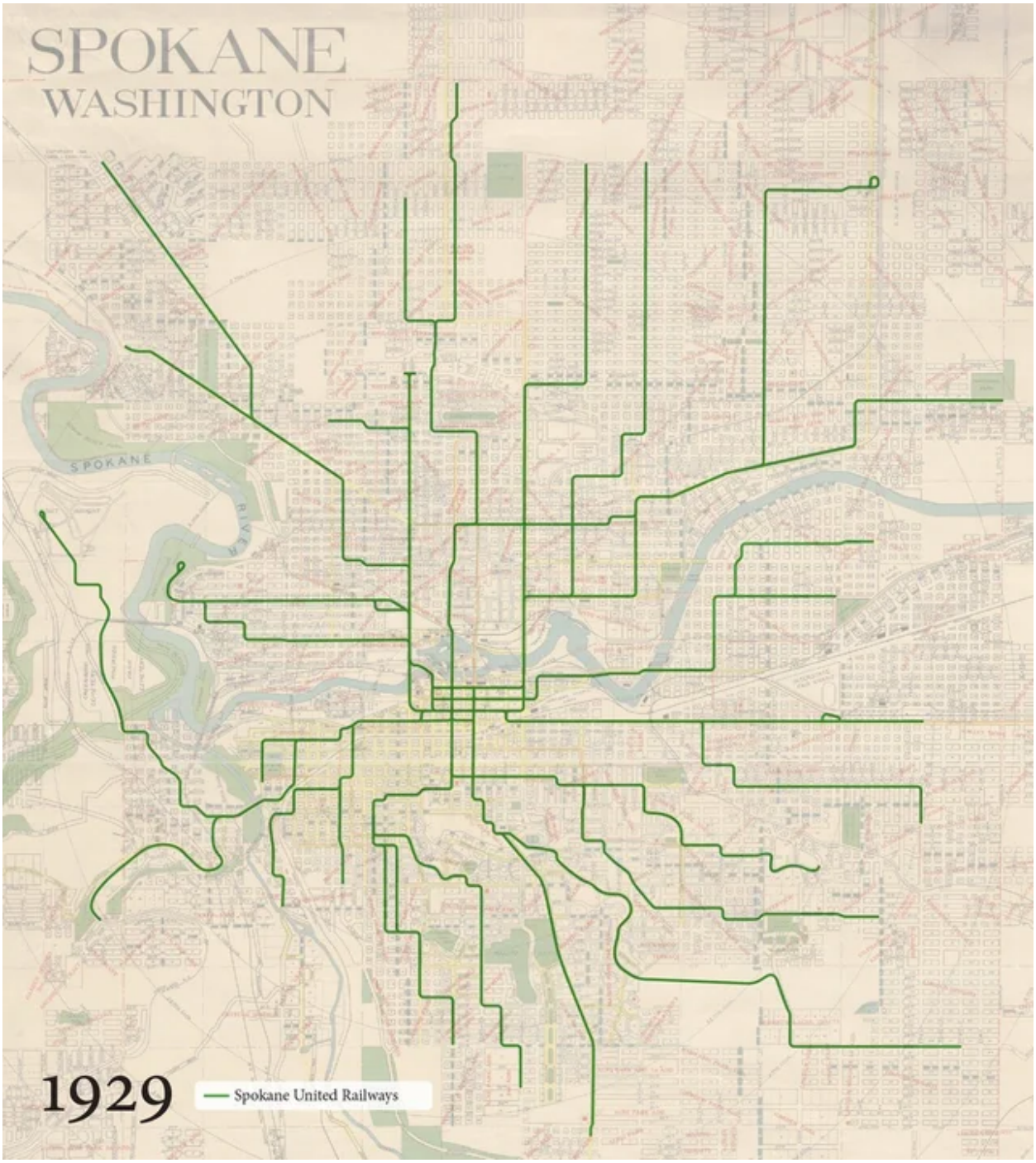
In the 1800s, U.S. soldiers arrived and displaced the Spokanes from their ancestral land as white settlement increased. Settlement increased within the area in the 1870s as the first sawmill was built, followed by stores, churches, schools, banks, hotels, saloons, and a newspaper. The area was formally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

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

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

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

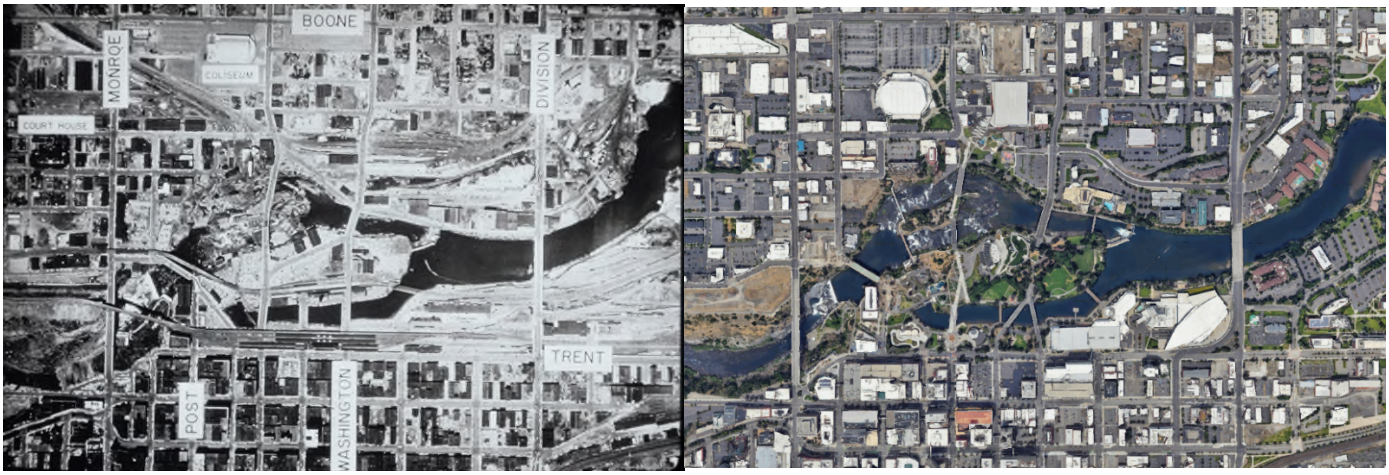
Exhibit 3.4-9. Spokane United Railways system, 1929



Source: (Transit Maps, 2017)

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

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



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

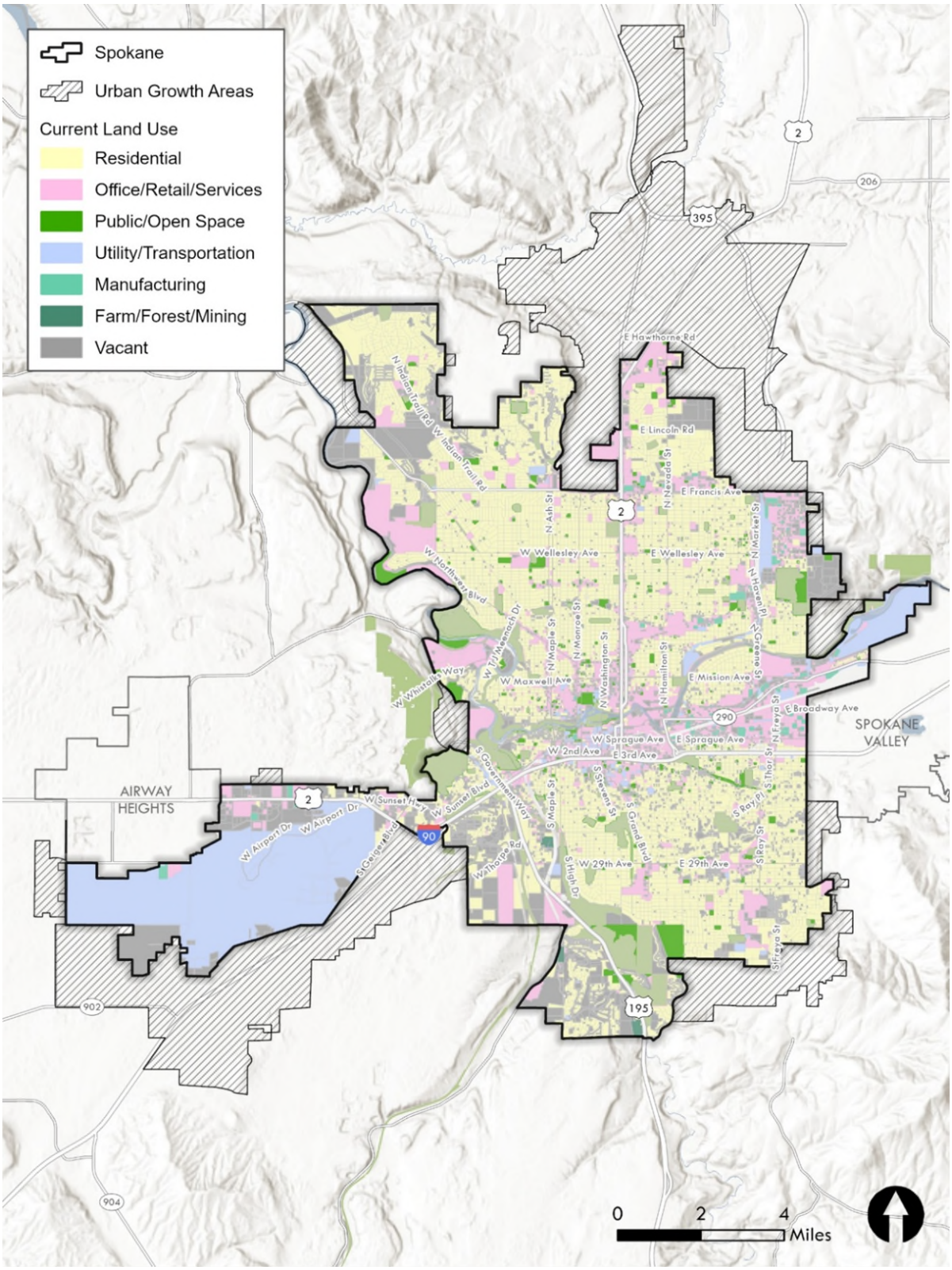
Current Conditions

Current Uses

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

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

Exhibit 3.4-11. Existing Land Use



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

Land Use in Northeast Spokane



Source: Google Earth

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

Land Use in Northwest Spokane



Source: Google Earth

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

Land Use in Center City



Source: Google Earth

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

Land Use in South Spokane



Source: Google Earth

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

Land Use in West Plains



Source: Google Earth

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

Building Types and Styles

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

Exhibit 3.4-12. Downtown Center City Spokane



Source: City of Spokane, 2025.

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

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

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



Source: City of Spokane, 2025.

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

Exhibit 3.4-14. Spokane Housing (Holyoke Ave)



Source: Google Maps

Land Capacity

While Spokane, like most cities in the United States, is experiencing a housing crisis, the City has identified ample space to accommodate all of its projected future growth in this planning horizon (2026-2046) within its existing boundaries. The 2025 Land Capacity Analysis identified 3,000+ parcels making up some 1,800 acres (**Exhibit 3.4-15**), capable of housing nearly 70,000 additional Spokanites in 33,000 new dwelling units.

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

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

Source: (City of Spokane, 2025)

Cultural Resources

Cultural and Archaeological Resources

As further described in **Overview of Historical Planning and Land Use Patterns** on **page 3-102**, the Spokane Tribe's ancestral homelands encompass the Spokane River and surrounding region. The Spokanes are composed of three ethnographic bands: Lower Spokane at Little Falls and the Spokane River mouth, the Middle Spokane at Tum Tum and the Little Spokane River, and the Upper Spokane on

Latah Creek and Spokane Falls. The Spokanes relied on migrating salmon in particular, which was limited greatly by the damming of the Spokane and Columbia rivers. (Historical Research Associates, Inc. , 2015) (Spokane Tribe of Indians, 2020) (Arksey, 2005) The area was also a major trading center for the Spokanes as they welcomed other area Tribes through their relations, history, trade, and ceremony.

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

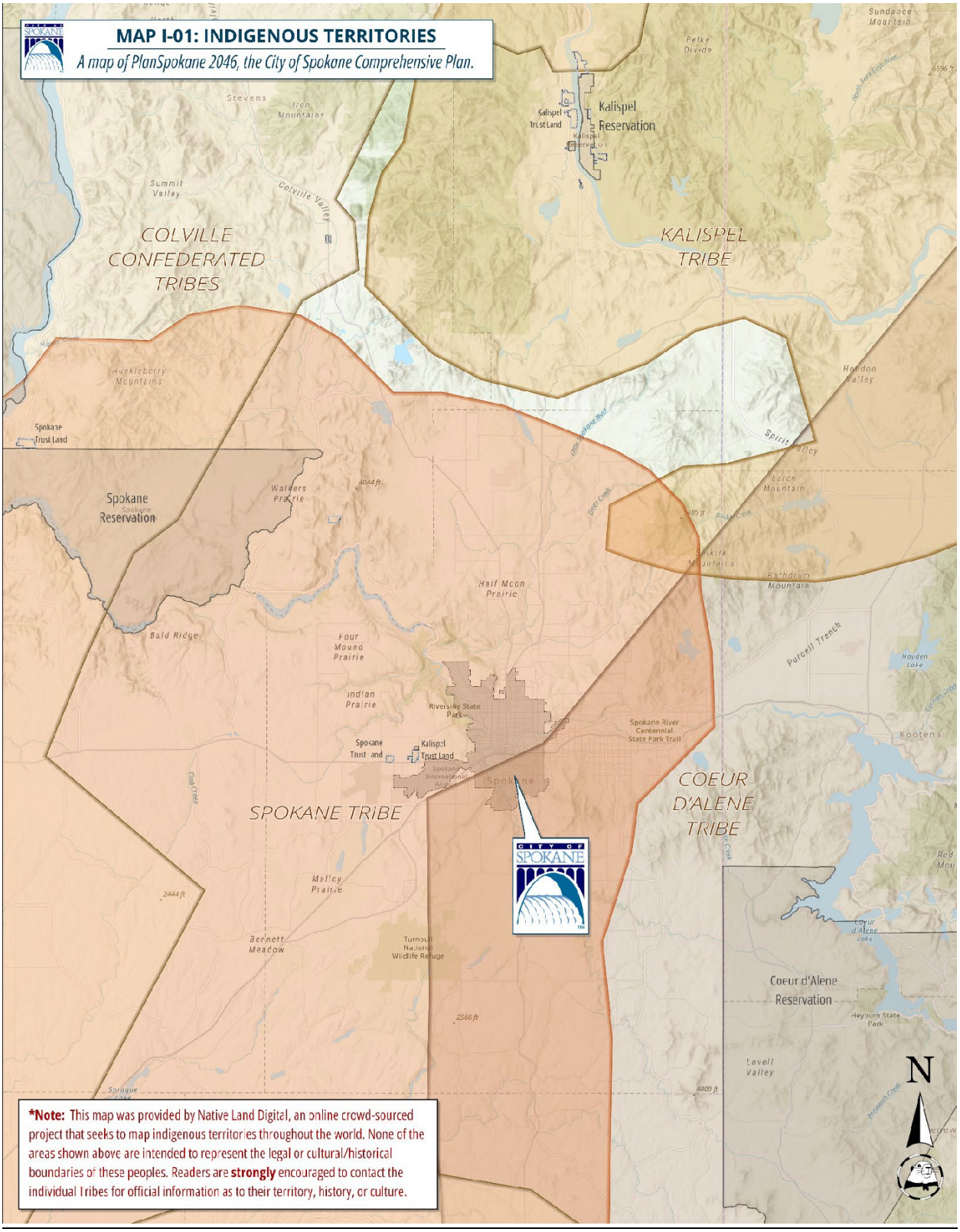
The Coeur d'Alene Tribe has occupied, camped, boated, and ridden throughout North Idaho and Eastern Washington, including current-day Spokane city limits. In 1858, after the Battle between the Tribes including the Coeur d'Alene and Steptoe, a Treaty was negotiated between the Tribal Nations and the U.S. Government. An 1873 Executive Order under President Ulysses S. Grant established the original boundaries of the Coeur d'Alene Reservation, totaling more than 500,000 acres. The City consults with the Coeur d'Alene Tribe on City or Tribal projects. (Coeur d'Alene Tribe, 2026)

The City has invited participation of several Tribes and Urban Native Organizations in the PlanSpokane 2026 effort through the EIS scoping and comment process and development of the Climate Element.

The City has incorporated a map of Indigenous Territories in its Draft Comprehensive Plan[1] which uses Native Land Digital, a crowd sourced platform, which does not necessarily reflect legal or cultural/historical boundaries. See **Exhibit 3.4-16**.

[1] See: https://my.spokanecity.org/planspokane/chapter-review/.

Exhibit 3.4-16. City of Spokane and Vicinity, Indigenous Territories, Native Land Digital

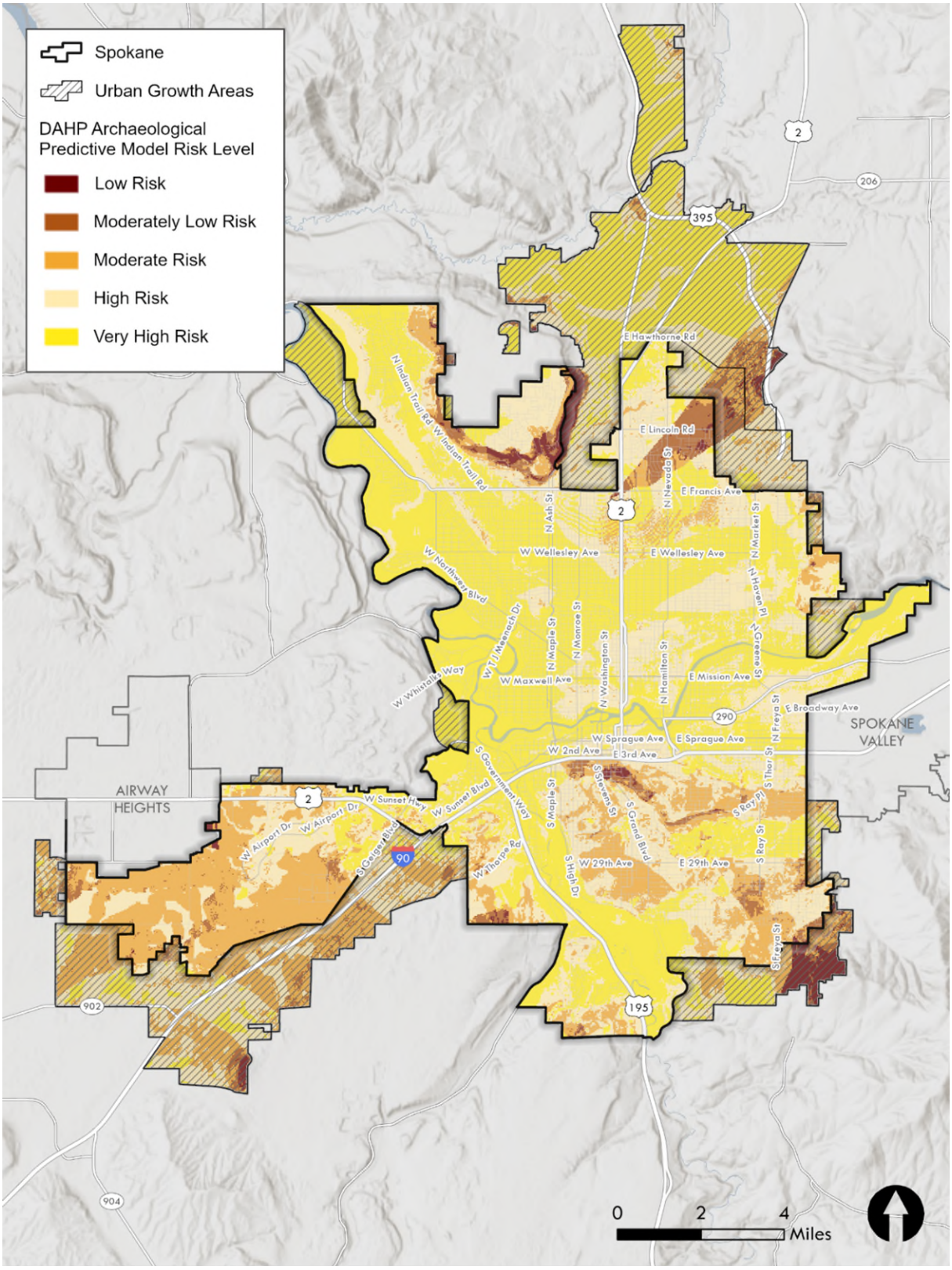


Source: Native Land Digital, City of Spokane, 2026

The potential for archaeological resources is very high or high risk throughout most of the city limits. See **Exhibit 3.4-17**.

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

Exhibit 3.4-17. 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.

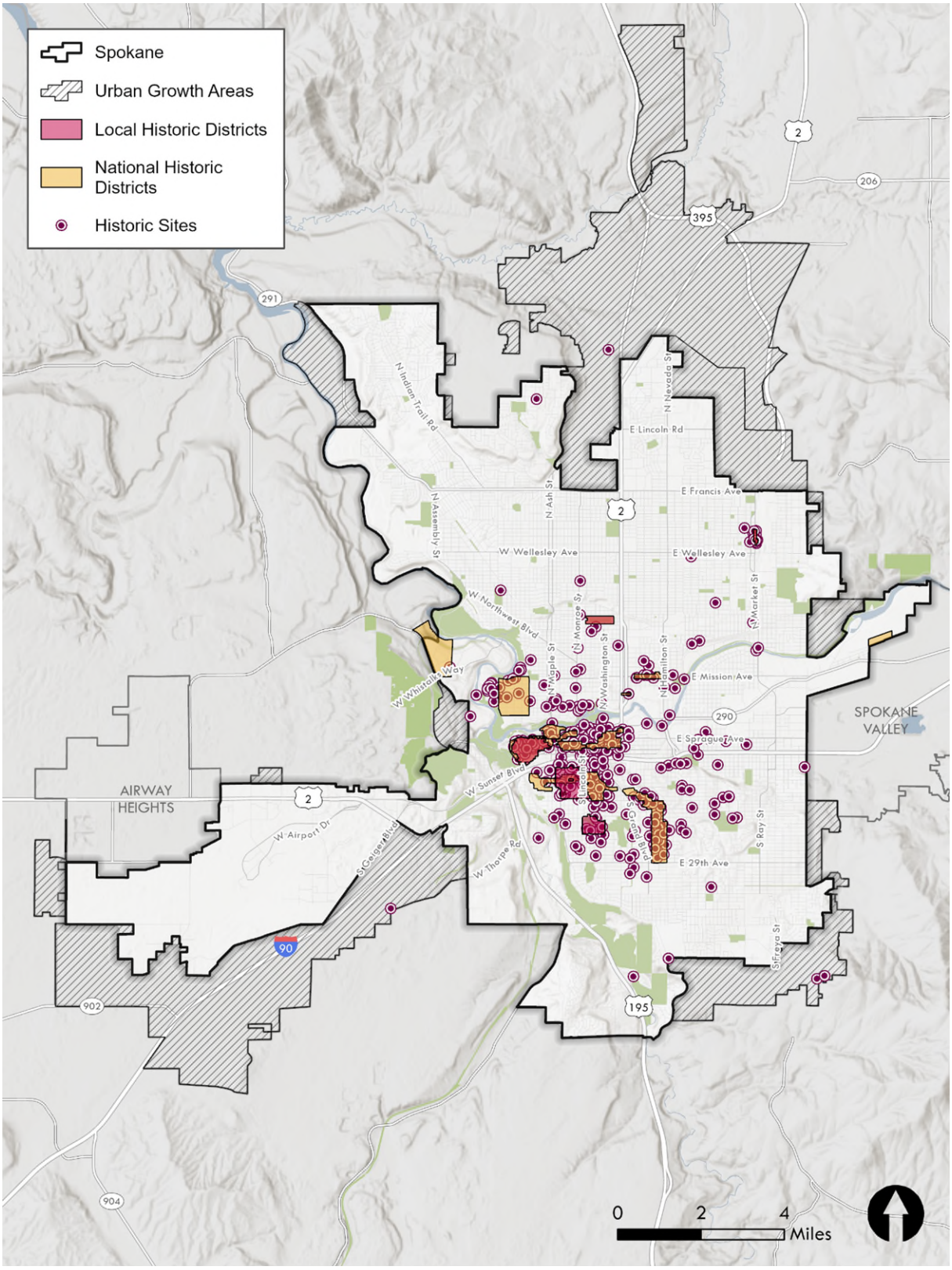
There are ~~eighteen~~ nineteen historic districts on the local or national registers of historic places within Spokane. There are also over 400 individual local sites designated in the Spokane Register of Historic Places and 1000+ more properties included in local historic districts. See **Exhibit 3.4-18** and **Exhibit 3.4-19** for a citywide view of districts and places and **Exhibit 3.4-20** for a closeup of the districts.

Exhibit 3.4-18. 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
Cannon Hill Park	Yes	No	59.9	South
Comstock-Shadle	Yes	No	1.6	South
Corbin Park	Yes	Yes	35.2-45.3	Northwest
Desmet Avenue Warehouse	No	Yes	3.7	Northeast
East Downtown	No	Yes	68.7	Center City
Felts Field	No	Yes	27.4	Northeast
Ft. George Wright	No	Yes	183.9	Northwest
Hillyard Business District	Yes	Yes	8.4	Northeast
Marycliff-Cliff Park	No	Yes	82.6	South
Mission Avenue	No	Yes	23.5	Northeast
Nettletons	No	Yes	192.9	Northwest
Ninth Avenue	No	Yes	73.6	South
Peaceful Valley	No	Yes	40.4	Center City
Riverside Avenue	No	Yes	17.4	Center City
Rockwood	No	Yes	181.7	South
West Downtown	No	Yes	35.8	Center City

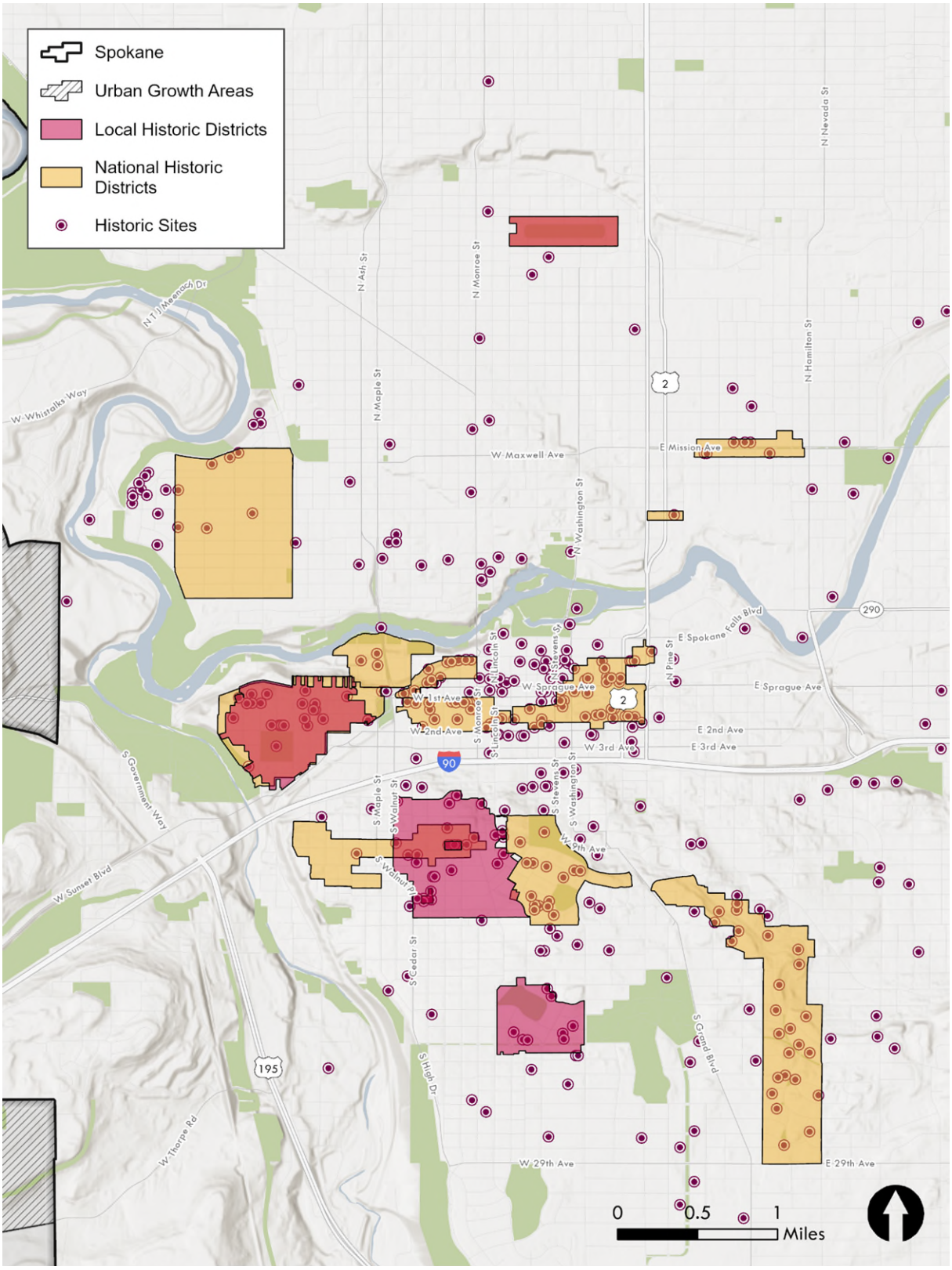
Source: Spokane City/County Historic Preservation Office, 2025.

Exhibit 3.4-19. Historic Districts and Properties in City of Spokane



Source: (Spokane City/County Historic Preservation Office, 2026); ***NOTE:*** *The exhibit above was updated with the Final EIS.*

Exhibit 3.4-20. Historic Districts and Properties – Central Spokane Vicinity



Source: (Spokane City/County Historic Preservation Office, 2026); ***NOTE:*** *The exhibit above was updated with the Final EIS.*

Environmental Justice

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

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

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

Noise

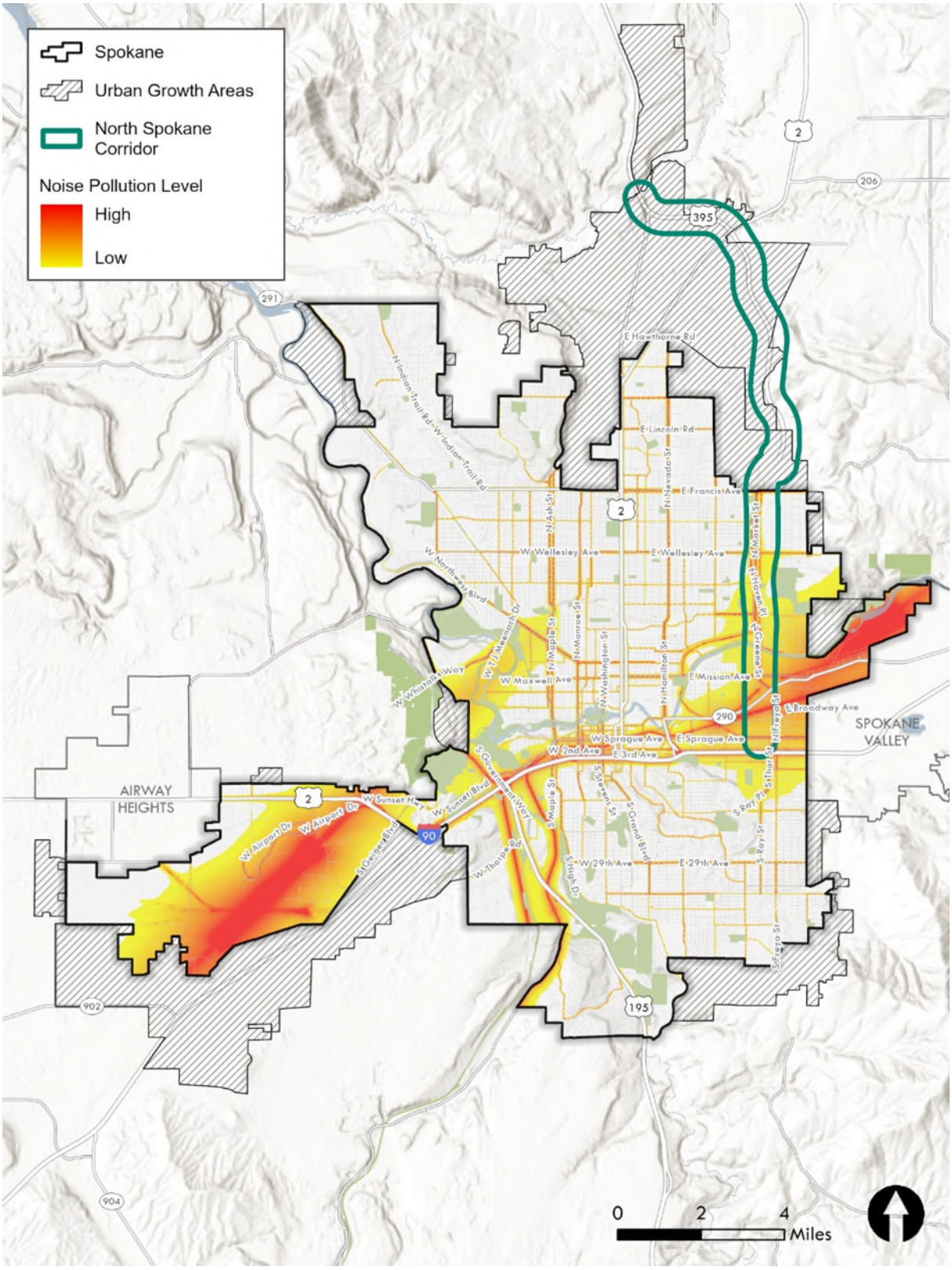
With the Spokane International Airport in the West Plains area, Felts Field—a general aviation relief airport—in Northeast Spokane, a cross-country Interstate Highway running east to west through the city, and a strategic position on the freight rail network, Spokane experiences high levels of noise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

Exhibit 3.4-21 shows noise pollution levels across the city. The map highlights the impacts of Interstate 90 and the railroad corridor on Center City and the East Central neighborhood in particular, as well as the location of the North Spokane Corridor, a 10.5-mile multimodal transportation route planned for completion by 2030, which may contribute to increased noise impacts in the East Central neighborhood and Northeast Spokane study area.

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

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

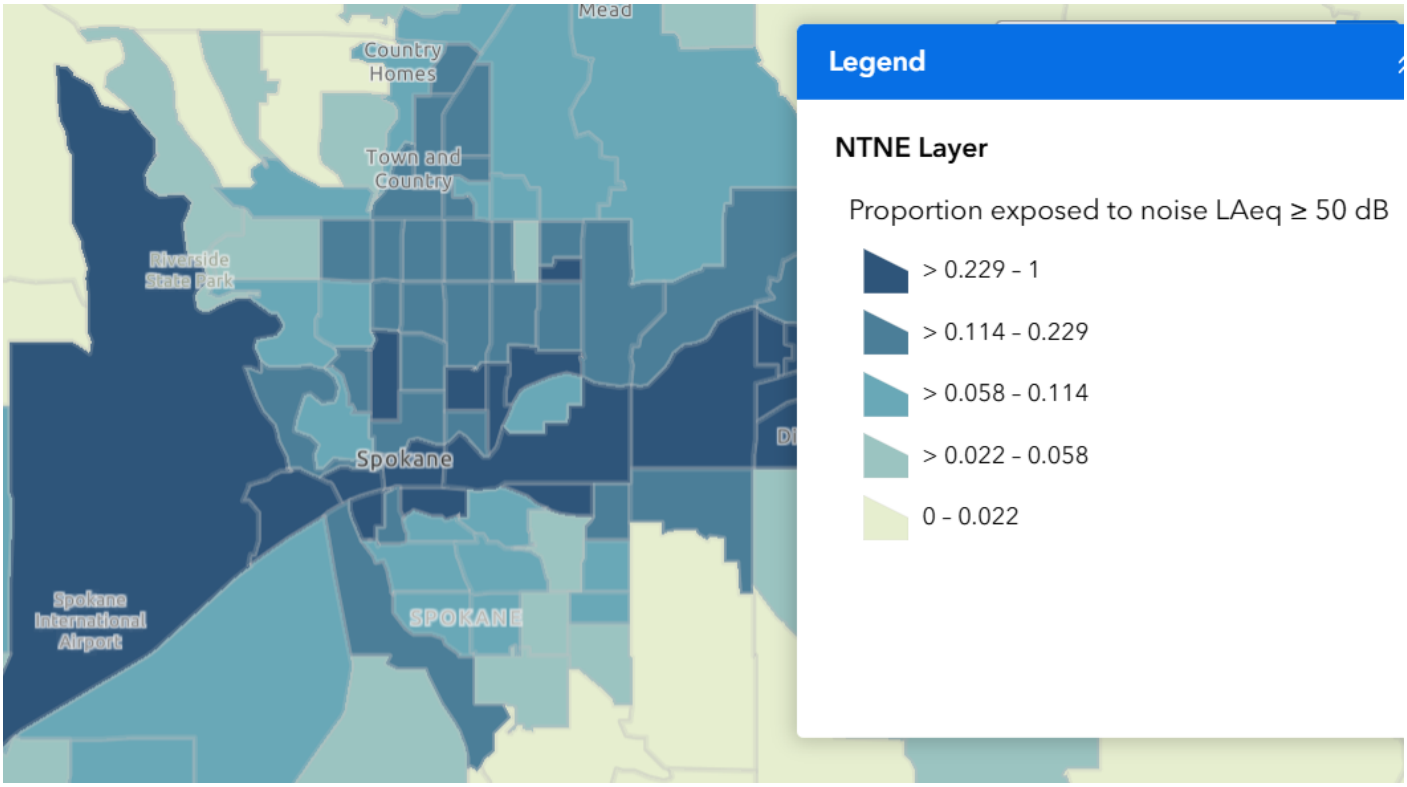
Exhibit 3.4-21. Existing Transportation-Related Noise



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

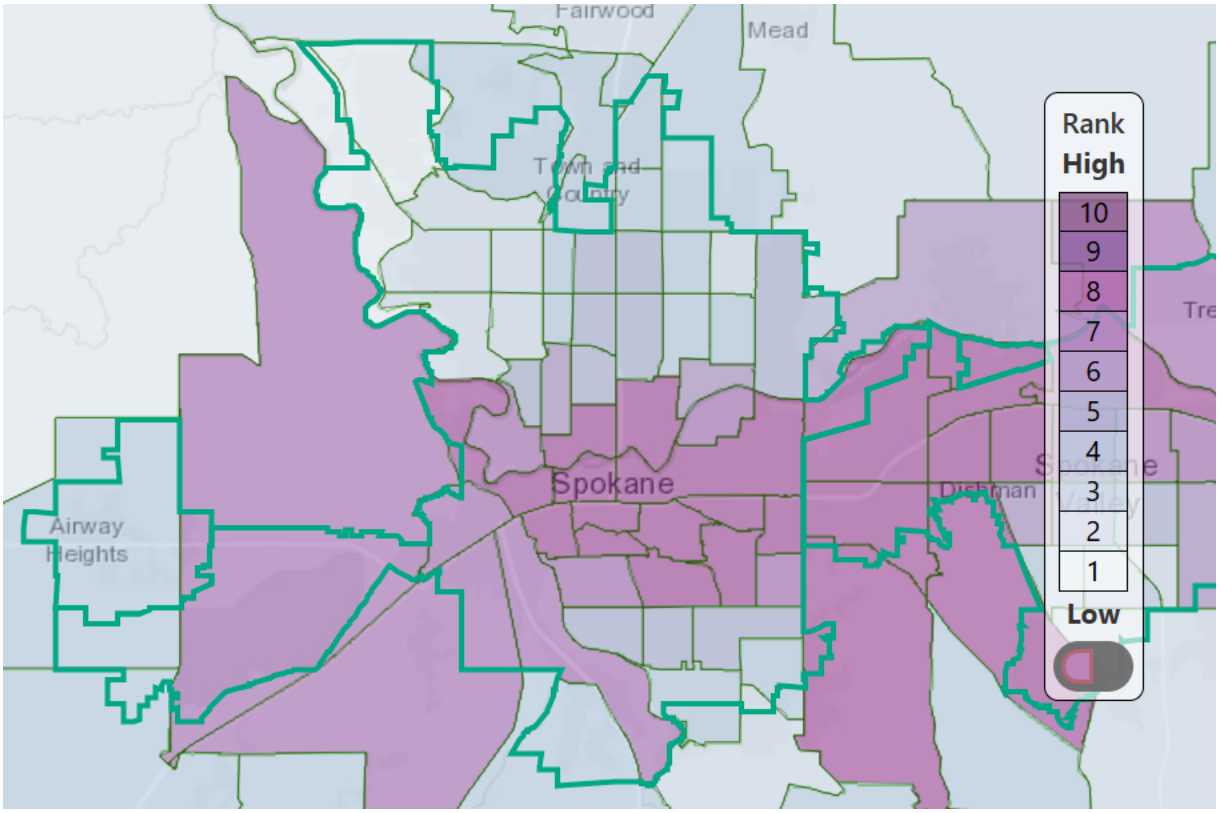
The population affected by high noise levels is relatively high in the Northwest, Center City, East Central, and Northeast Spokane areas. See **Exhibit 3.4-22** and **Exhibit 3.4-23** which shows population affected by transportation noise and population affected by state roads. The Washington State Department of Health has identified that "traffic volume and density greatly impact health conditions and are associated with infant mortality, poor birth outcomes, cardiovascular disease, and cancers [and] the effect of pollution is more pronounced among the elderly and those who have preexisting health conditions." (Washington State Department of Health, 2022)

Exhibit 3.4-22. National Transportation Noise Exposure Map – Share of Population Exposed to Noise Greater than 50 dB



Source: (Seto and Huang, 2023)

Exhibit 3.4-23. Population in Census Tracts within Proximity to Heavy Traffic Roadways



Source: (Washington State Department of Health, 2022)

Light & Glare and Shade and Shadow

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

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

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

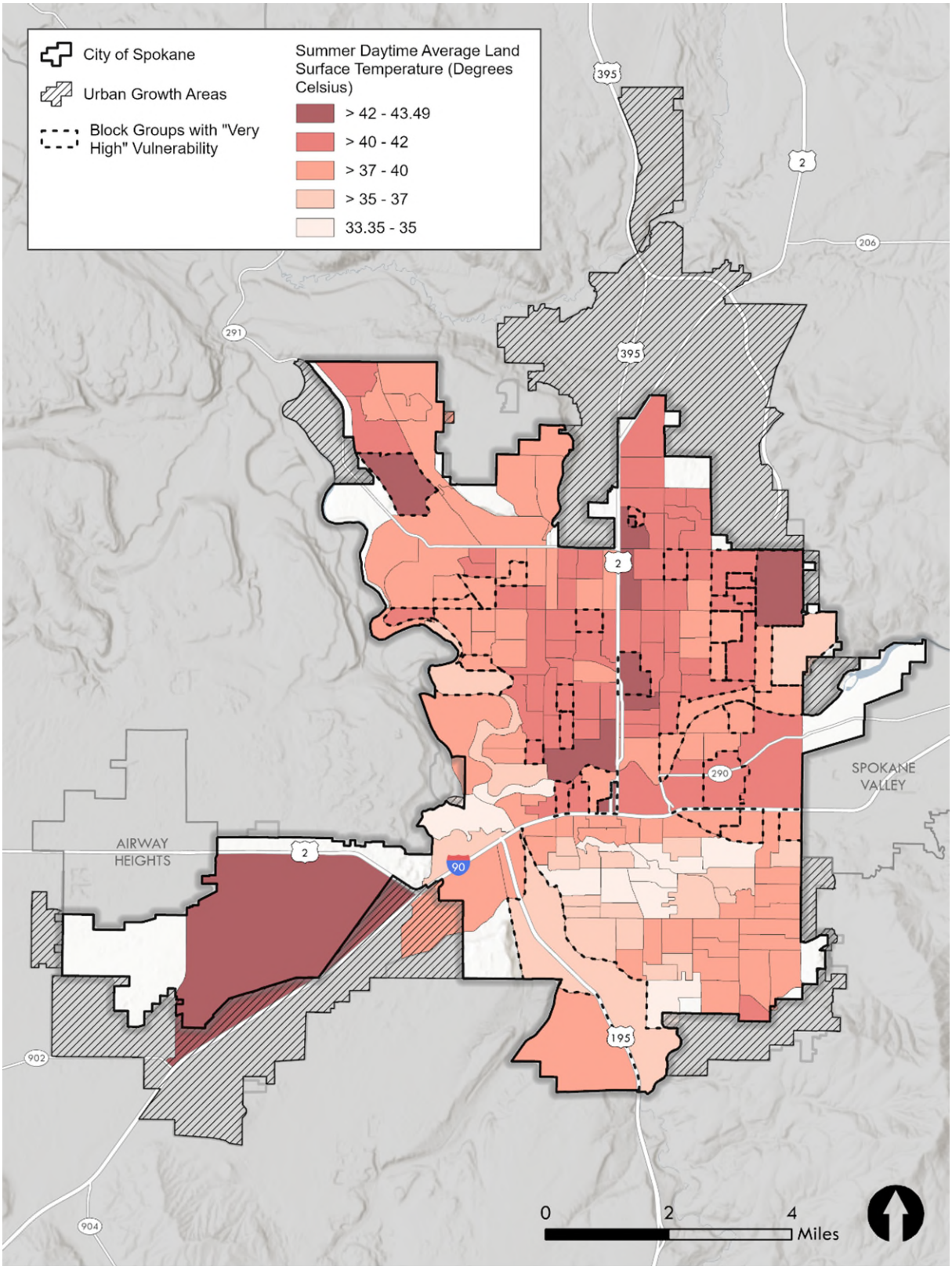
major role in shadow formation, as structures over two stories tall often cast long shadows that reach the sidewalk.

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

Heat Island

Spokane, like most urbanized areas, struggles with the Urban Heat Island effect. The most affected areas have low tree canopy and high impervious surfaces, exacerbating high land surface temperatures. People can be affected by heat islands outdoors walking or recreating, or in buildings lacking cooling when extreme heat events occur. Well-shaded neighborhoods can be more than 10 degrees cooler than poorly shaded ones (Institute for Climate, Water, and the Environment, 2022). As is the case in many cities around the country, this burden of higher temperatures tends to fall on the more vulnerable populations within Spokane (**Exhibit 3.4-24**).

Exhibit 3.4-24. Land Surface Temperature and Census Blocks with Very High Vulnerability



Source: LANDSAT-8; BERK, 2025.

Summary of Affected Environment

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

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

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

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

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

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

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

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

3.4.2 Impacts

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

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

Impacts Common to All Alternatives

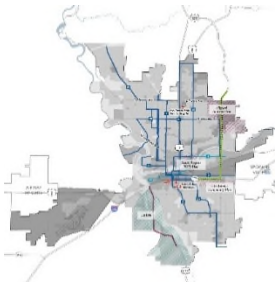
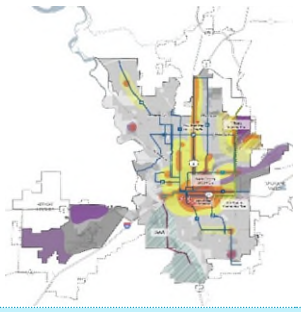
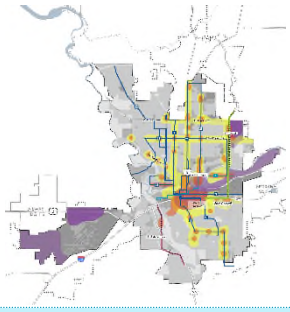
The alternatives primarily differ in how growth is distributed and intensified across the city, as well as in their projected land use patterns. The pace and location of future development would be shaped by factors such as the implementation of Comprehensive Plan policies, related regulations and actions,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

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

Land Use Patterns and Compatibility

Growth across all alternatives—housing, commercial, industrial, and mixed-use— will spur new development and redevelopment citywide. Across all alternatives, more diverse land uses will locate near each other, increasing mixed-use patterns within activity hubs, centers, corridors, and, to varying degrees, other parts of the city. **Exhibit 3.4-25** shows a comparison of future land use intensity, based on the designated amount of land, for each alternative. While the Comprehensive Plan encourages mixing uses in centers and corridors, some adjacencies could potentially cause adverse compatibility impacts on less intense uses. Over time, infill and redevelopment will raise development intensity in areas not yet built to full zoning capacity. The extent of these conflicts varies by alternative and would continue to be mitigated through the application of existing development regulations.

Exhibit 3.4-25. Future Land Use Intensity Qualitative Comparison

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

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

Under Alternatives 2 and 3, as well as the Preferred Alternative, new mixed-use development could replace areas originally zoned for a single use. This would occur in Northwest, Northeast, and South Spokane study areas. See **Exhibit 3.4-26**. Greater mixing of uses can increase localized spillover effects, such as noise, particularly in Downtown and other urban centers and corridors. While not unusual in these areas, such impacts remain a potential adverse effect of future growth. They can be mitigated through land use policies that provide transitions in intensity, apply use restrictions, and separate incompatible zones, as well as through continued enforcement of noise, nuisance, and public safety codes.

In Alternatives 2 and 3, as well as the Preferred Alternative, the Northeast study area is assumed to transition from primarily industrial uses to a blend of industrial, mixed-use development, and high- to moderate-intensity residential neighborhoods. This shift could bring a range of potential impacts, such as increased traffic and freight movement, changes in neighborhood identity, greater demand for infrastructure and public services, and possible land use conflicts where residential areas meet active industrial sites. At the same time, the mix of uses could create opportunities for new jobs, improved amenities, and more housing choices within walking distance of employment centers. See additional study area comparisons in **Exhibit 3.4-26**.

Exhibit 3.4-26. Land Use Summary Evaluation by Area

Area	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
Northwest Spokane	Continue as planned More growth on vacant land in North Indian Trails. Medium and high residential intensities and commercial uses along some corridors. Middle housing in Residential Low areas.	Residential moderate to high, mixed-use zones extending northwest and east-west along corridors/frequent transit routes.	Residential moderate to high concentrated in southeast area nearer to Central City/Downtown core; some residential moderate and mixed-use distributed along N Indian Trail Rd.	Residential moderate to high and mixed-use/commercial distributed along the southeast area nearer to Central City/Downtown core, as well as along W Northwest Blvd, W Wellesley Ave, N Division St, N Monroe St, and W Francis Ave.

Area	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
Northeast Spokane	Continue as planned Redevelopment potential in some corridors and centers. Middle housing in Residential Low areas.	Residential moderate to high, mixed-use zones extending north and east-west along corridors/ frequent transit routes. Residential moderate to high and mixed-use around edges of Hillyard area. Industrial focused on upper northeast.	Residential high and mixed-use concentrated on Division St. Residential moderate to high and mixed-use around edges of Hillyard area. Industrial focused on upper northeast.	Residential moderate to high zones with mixed-use/commercial nodes extending north and east-west along corridors/ frequent transit routes. Residential moderate to high and mixed-use around edges of Hillyard area. Industrial focused on upper northeast.
Center City	Continue as planned. Downtown would have unlimited heights per interim regulations. South Logan Subarea Plan not included in growth estimates.	Residential high and mixed-use distributed beyond just the downtown core.	Intense clustering of high and moderate-high growth with strong focus on mixed-use and housing on surrounding neighborhoods and along Division Street.	Moderate clustering of high and moderate-high growth with focus on mixed-use/ commercial uses and housing. Growth radiates from Center City, following some of the surrounding transit corridors.
South Spokane	Continue as planned. More growth in Latah/Hangman neighborhood on vacant land. Redevelopment potential in some corridors and centers. Middle housing in Residential Low areas.	Moderate-to-high residential spread further south along South Regal St; mixed-use focus on designated centers: Grand District, Lincoln Heights, South Gate, 57th & Regal. More growth in Latah/Hangman neighborhood on vacant land and a small mixed-use hub.	More limited spread south; growth stays nearer the city center, with fewer outer high-intensity zones. More growth in Latah/Hangman neighborhood on vacant land.	Moderate-to-high residential spread with mixed-use/commercial nodes along S Grand Blvd, E 29th Ave, and S Regal St. Residential growth on vacant land in Latah/Hangman area.

Area	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
West Plains	Continue as planned.	Industrial heavy concentration north of the airport; residential uses are minimal, prioritizing employment/ industrial functions.	Expanded industrial concentration to southwest of airport; residential uses are minimal, prioritizing employment/ industrial functions.	Expanded industrial concentration to southwest of airport; residential uses are minimal, prioritizing employment/ industrial functions.

NOTE: The Preferred Alternative was added to the figure above with the Final EIS.
Sources: BERK, 2026.

Urban Form

Height, Bulk, & Scale

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

Transitions

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

These changes can also create sharper boundaries between different types of areas. Centers and corridors often have a mix of zones (CC 1, 2, 3, and 4) and building types, ~~, and i~~In Alternatives 2 and 3, as well as the Preferred Alternative, growth is expected along their edges. While these areas may eventually blend together more smoothly, in the short term the contrast between low density neighborhoods and busier, more developed centers may become more pronounced.

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

Tree Canopy

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

Shadows

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

Views

Taller, larger buildings are expected in all alternatives, which could change some scenic views. This is likely in ~~both~~ Alternatives 2 and 3, as well as the Preferred Alternative, where new development in the northwestern part of the Center City study area may impact ground-level views of the Spokane River Gorge and Downtown Spokane from the north side of the river. Current rules in the North River Overlay District aim to preserve these vistas.

Cultural Resources

Under all alternatives there is a potential to disturb archaeological resources during construction given the extensive very high- and high-risk areas throughout most of the city, especially in the Northwest, Northeast, Center City, and Division study areas, as well as the Latah/Hangman portion of the South study area and areas around the Spokane River. 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 adversely 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 A~~a~~lternatives 2 and 3, as well as the Preferred Alternative, 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. Drawing from both Alternative 2's emphasis on transit-rich corridors and Alternative 3's focus on major activity hubs, the Preferred Alternative directs new housing, mixed-use development, and job growth in, West Plains, and Hillyard, while encouraging greater integration of commercial activity along key corridors. This intentional distribution of growth and services can improve access for historically underserved communities and support shorter trips and transit use, helping to reduce air pollution and heat island effects.

North Spokane Corridor (US 395)

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

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

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

Division Bus Rapid Transit (BRT)

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

Alternative 1: No Action, Stay the Course

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

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

- **Land use compatibility:** Development continues under existing zoning; minimal new conflicts between adjacent land uses.
- **Urban form compatibility:** Existing scale and form patterns would be maintained; abrupt transitions may continue where high-density Centers meet lower-density neighborhoods. There would be more limited improvements in street connectivity, sidewalks, or public realm design.
- **Cultural Resources:** Growth could occur throughout the city, and there is potential to disturb cultural resources during construction. Alternative 1 proposes similar total growth as other alternatives, but focuses more growth in areas in outer neighborhoods such as North Indian Trail as well as in centers and corridors. It would not increase the capacity for development and may have less pressure on historic sites or districts since it has less intensity planned along corridors with existing development built more than 45 years ago. However, since more development is focused in low density areas there may be a greater risk that undisturbed cultural resources may be found.
- **Environmental Justice:** Historically underserved communities may continue facing unequal access to amenities, transit, or services (see also **Section 3.5**). Existing environmental burdens, such as noise or light near development intense or industrial zones. This could be lessened with current transitional standards but may occur to a greater degree than other alternatives.

Alternative 2: Distributed and Balanced

Alternative 2 maintains the existing network of centers and corridors but better connects them by encouraging greater integration of mixed-use development and commercial activities along transit-rich corridors. This approach responds to community interest in creating more walkable, service-rich neighborhoods by introducing small-scale, neighborhood-oriented retail nodes in strategic locations, guided by specific locational criteria. Some centers connected by transit could evolve into corridor

development. These retail and mixed-use hubs would strengthen connections between residential areas, transit stops, and commercial destinations, enhancing both accessibility and quality of life. Additional discussion of impacts under Alternative 2 includes:

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

Alternative 3: Center City and Regional Hubs

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

Potential impacts under Alternative 3 include:

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

Preferred Alternative

NOTE: *Analysis for the Preferred Alternative was added below with the Final EIS.*

The Preferred Alternative blends characteristics of all studied alternatives into a balanced and comprehensive growth strategy. Like Alternative 3, it directs housing growth to major hubs, particularly Center City. At a mid-range job growth level, it also supports additional education and health jobs in the Center City particularly the University District, while concentrating new industrial jobs in public development authorities in West Plains and Northeast Spokane. Like Alternative 2, it designates mixed-use and housing growth along bus rapid transit lines and corridors with frequent transit service, encouraging walkable, transit-oriented development across the city. This balanced approach distributes growth across existing and future major activity hubs, which can strengthen access for historically underserved communities and support reduced vehicle trips, lower air pollution, and a more resilient city.

Potential impacts under the Preferred Alternative include:

- **Land Use Compatibility:** The Preferred Alternative strives for a balance between the hub-oriented growth of Alternative 3 and the corridor-focused approach of Alternative 2, combining high-density housing, mixed-use development, and job growth at major hubs with the integration of housing and commercial activity along transit-rich corridors. This approach spreads growth across existing centers, corridors, and employment hubs, which may ease transitions between higher- and lower-intensity areas. Concentrations of high-intensity residential and commercial uses at major hubs may still create sharp transitions with adjacent lower-density neighborhoods, and industrial intensification in certain areas, particularly the Northeast, may warrant attention to surrounding land uses. Additionally, while growth intensification along corridors could introduce some contrast with nearby residential areas, small-scale neighborhood

Draft Comprehensive Plan Selected Growth Strategy Policies

GS-3.3, Reducing Sprawl - Plan for and accommodate diverse, affordable, and attainable housing types to meet demand while avoiding sprawl in order to decrease emissions and infrastructure costs and preserve open space.GS-4.2, Neighborhood-Serving Retail - Allow and support neighborhood-serving commercial uses that help meet the daily needs of residents in every neighborhood, including allowance for corner and grocery stores, community gathering spaces, food service, and small-scale mixed-use development within residential areas.

GS-4.3,, Scalable Mixed-Use - Designate mixed-use areas at a range of scales throughout the city that provide a compatible mix of housing, commercial uses, and activities to focus growth, and support complete, walkable places.

GS-5.1, Designate and Plan Urban Hubs - Identify, establish, and support Urban Hubs around nodes of community activity through an inclusive public engagement process, and in consultation with relevant City departments and operations. Designation of Urban Hubs should be done with recognition of the equitable distribution of opportunities for economic investment while considering the potential for displacement.

GS-5.2, Urban Hub Context - Scale Urban Hubs based on proximity to major roadways and transit service, intensity of surrounding development, market opportunities, and potential community draw, recognizing they may be implemented through a range of sizes, shapes, and allowed uses based on their context.

GS-5.6, Corridors - Identify Corridors to connect Urban Hubs and establish a network of increased multimodal connection throughout the city, encouraging mixed-use development, neighborhood services, housing, public open space, and employment along their length. The intensity of development along Corridors should be scaled to the intensity of the roadway and transit service.

retail nodes may reduce spillover effects such as noise and traffic by targeting mixed-use intensification to key areas.

- **Urban Form Compatibility:** Like Alternatives 2 and 3, the Preferred Alternative welcomes new neighborhood-scale retail nodes and a broader range of housing types, including low- and mid-rise options at densities above middle housing. While growth is more distributed than in Alternative 3, significant building scale, massing, and intensity would still be concentrated in major hubs, particularly Center City and the University District, where sharp transitions at the edges of priority growth areas are possible. Public realm investments can create more gradual shifts from Center City to surrounding neighborhoods. Along transit-rich corridors, gradual densification may introduce changes in building height and scale that contrast with adjacent low-density areas. The Preferred Alternative mitigates this by blending housing corridors with targeted mixed-use commercial hubs, creating a more incremental transition. Improved street-level design and pedestrian infrastructure can further support visual coherence and walkability, turning potential points of tension into opportunities for vibrant streets.
- **Cultural Resources:** While concentrated development pressure in Center City and Hillyard, as well as new mixed-use nodes or corridors, could increase the potential to disturb cultural resources or alter and demolish historic buildings and districts, the Preferred Alternative's focus on already urbanized areas can reduce the risk to undisturbed cultural or historic resources compared to Alternative 1. Remaining potential impacts can be managed through proactive measures, including advance review and application of historic preservation and cultural resource policies and regulations, as well as incentives to encourage adaptive reuse.
- **Environmental Justice:** While Center City, regional hubs, and corridors stand to benefit from enhanced infrastructure, amenities, and transit access, the remaining areas may see more limited improvements, a disparity worth monitoring for its potential effects on vulnerable communities. In contrast, high-intensity growth could also introduce localized challenges such as heat island effects, traffic congestion, or noise if not paired with appropriate environmental mitigation. The Preferred Alternative's blend of Alternatives 2 and 3 helps reduce some of these risks by intentionally distributing mixed-use development and services, which can improve access for historically underserved communities by encouraging transit use and shorter trips, thereby reducing air pollution and heat island effects. However, there are opportunities to go further. Livability and streetscape improvements could be applied across corridors. This could include enhanced tree canopy and shade structures to address extreme heat, criteria for neighborhood commercial areas to ensure access to commercial and civic uses in underserved locations, and noise abatement standards. Implementation of Climate Element mitigation and adaptation policies would further reduce environmental justice impacts. Like Alternatives 2 and 3, the Preferred Alternative incorporates new climate adaptation and mitigation goals per HB 1181 throughout the Comprehensive Plan elements and updates critical areas regulations.

Maximum Development Scenarios

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

If growth accelerated to the maximum potential development per land capacity, which is unlikely as this level of growth would be above the State OFM most likely projection, it could increase the potential land use impacts described above for each alternative:

- **Land Use Form and Urban Form:** Under both the No Action and Preferred Alternatives, there could be more dense development and infill with mixed use and multi-unit growth along major arterials and transit routes and in commercial centers. Under the Preferred Alternative, there would be more multi-unit capacity; within Future Land Use change areas there are about 279 acres of buildable lands and most of the buildable acres are planned for Mixed Use and Residential High designations per **Chapter 2 Exhibit 2.4-16**. Single unit development and middle housing would continue to be developed and be the most prevalent use in the city under either the No Action or Preferred Alternatives with slightly more prevalence under the No Action Alternative.
- **Cultural Resources:** If all developable property were modified to add allowable housing and mixed use development there is a greater likelihood of the potential to alter historic properties or disturb cultural resources, which could be mitigated by proactive planning and studies, incentives, and protective regulations.
- **Environmental Justice:** If there were accelerated growth under both the No Action and Preferred Alternatives, greater investments in enhanced infrastructure, amenities, and transit access would be needed to address environmental quality (noise and air pollution) and urban heat islands especially under the Preferred Alternative, which has greater capacity for housing and population growth. The Preferred Alternative would place more population in proximity to transit, which could benefit walkability and access to amenities. The Preferred Alternative would implement climate policies and strategies to reduce climate and environmental justice impacts.

3.4.3 Mitigation Measures

Incorporated Plan Features

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

Regulations and Commitments

Zoning and Urban Design

Spokane's municipal code contains regulations for land use and urban form. Standards address height, including transitions between more intense and less intense zones, building coverage, blank

walls, roof forms, landscaping, and screening, and more. These regulations as well as existing supporting policies and programs would serve to mitigate impacts associated with the alternatives.

Noise, Light, Heating and Cooling

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

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

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

Cultural and Historic Resources

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

- National Historic Preservation Act (NHPA) of 1966, as amended, known as Section 106, has implementing regulations (36 CFR Part 800), that require federal agencies, or those receiving federal grants or funds, or a federal permit or license, to identify historic properties, assess adverse effects, and resolve those adverse effects.
- Archaeological Resources Protection Act (ARPA) of 1979 protects archaeological resources.
- National American Graves Protection and Repatriation Act (NAGPRA) creates protections for Native American burial sites, remains, and cultural objects.
- Washington Executive Order 21-02 (formerly 05-05) requires that impacts to cultural resources must be considered as part of any state-funded project or investment and must include consultation with Washington State Department of Archaeology and Historic Preservation (DAHP) and with Tribal governments.
- Washington State law (RCW 27.53 and 27.44) protects archaeological resources (RCW 27.53) and Indian burial grounds and historic graves (RCW 27.44) located on both the public and private lands of the State.
- An archaeological excavation permit issued by the DAHP is required in order to disturb an archaeological site.
- Knowing disturbance of burials/graves and failure to report the location of human remains are prohibited at all times (RCW 27.44 and 68.60).

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

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

and appropriate Tribal entities agree in writing on measures to protect potentially affected archaeological or historic artifacts or cultural resources.

Spokane's zoning code includes Chapter 17D.100 Historic Preservation, which addresses the nomination 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 though not all incentives have been used, which could be considered in future code evaluations and updates. Section 17D.100.230 of the Spokane Municipal Code specifically addresses demolition permits for historic structures located within the downtown boundary area, National Register historic districts, and centers and corridors, which were recently incorporated into the ordinance (Spokane City/County Historic Preservation Office, 2024).

Other Potential Mitigation Measures

Land Use and Urban Design

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

Cultural Resources

Advanced planning to eliminate, minimize, or avoid impacts to historic and 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. Another advanced planning effort could involve the preparation of a citywide historic preservation plan which could be used as a tool for developers to avoid major impacts to highly concentrated areas of historic resources.

The City could apply similar historic and 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 thresholds and level of investigation and, if necessary, mitigation; see the example in **Exhibit 3.4-27**. 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 3.4-27. Above Ground Cultural Resources Department of Archaeology and Historic Preservation (DAHP) Predictive Model and Summary Survey Recommendations

Risk Category	Minimum Evaluation
Low	Standard inadvertent discovery language (SIDL)
Moderately Low and Moderate	Desktop Review and SIDL
High and Very High	Survey and SIDL

Environmental Justice

Noise

To limit the impacts of temporary construction noise, in addition to restrictions on the hours of construction, other mitigation that could be applied includes:

- Installing barriers to shield noise sensitive receptors and enclosing stationary work.
- Selecting haul routes to avoid noise sensitive areas.
- Using alternative methods to pile-driving.
- Using fully baffled compressors or electric compressors.
- Using fully mufflered construction equipment.

Where there are new residential uses near noise sources such as highways, the City could require noise reduction standards in residential buildings where exterior noise levels greater than 65 dBA are likely to occur or where other uses occupying the same structure would likely contribute to excessive noise levels (above 45 dBA) within residences. These standards could include:

- Municipal code provisions to ensure interior noise levels for all buildings/land use types are within acceptable standards.
- Noise studies/mitigation for all development where the projected exterior noise levels exceed the City's allowable noise standards, to the extent feasible.
- Building standards or retrofits such as installation of acoustically rated windows and doors, installation of additional wall and attic/roof insulation, and installation of dampers and baffles on exterior vents, flues, and chimneys.
- Adopt goals or policies with site planning/design techniques to help guide land use planning decisions and encourage proper design for future developments. Such techniques may include, but are not limited to, the following:
  - Increase the distance from the road to the extent feasible, depending on road classification, while supporting walkability and encouraging neighborhood connectivity.
  - Place noise compatible land uses such as landscaping areas, maintenance facilities, and utility areas between the road and the residences or noise-sensitive uses.

- Use buildings or berms as noise shields by locating them parallel to the road(Note, this is an effective strategy for roads but is ineffective from aircraft noise). Soundproof the building if it contains residences.
- Locate residences in topographically low points that are naturally low noise pockets if they exist.
- Orient the residences—and spaces within the building that benefit from quieter volumes (bedrooms and living rooms)—away from the noise.
- Use cluster and planned unit development techniques to accomplish combinations of the above. However, these techniques have limited to no effect on noise originating from aircraft overhead.

The City should advocate for and coordinate with WSDOT on noise abatement and mitigation where major highways bisect and disrupt residential areas to advance environmental justice outcomes.

Noise from tire-pavement interactions is a dominant contributor to roadway noise. A long-term mitigation program to reduce noise in noise-sensitive areas within the study areas would be to install noise reducing pavement on major arterials and roadways that experience relatively high traffic volumes and speeds.

Light and Glare, Shade and Shadow

The following approaches could be taken with development regulation updates:

- Consider implementation of additional development standards to address maximum height of exterior illumination.
- Address placement, light output, direction, and shielding of any exterior illumination above a given height to reduce light and glare emissions to sensitive areas.
- Consider conditioning~~Condition~~ development near parks and open spaces or key pedestrian corridors with a combination of the following measures to reduce shading effects:
  - Height limits within a specified distance of the public space or shade and shadow analysis that demonstrate the preservation of sunlight in public spaces during peak periods of use.
  - Separation of high-rise building massing.
  - Maximum floorplate size.
  - Modification of high-rise tower location and orientation upper-level stepbacks.
  - Floorplate reductions.

Heat Island

The Climate Risk and Vulnerability Assessment identified adaptation and mitigation measures to improve resilience to extreme heat. Some measures recognize the balance of adding trees for shade while also managing for wildfire risk.

- Invest in green infrastructure to reduce the impacts of extreme heat.
- Invest in Tribal and cultural infrastructure to improve climate resilience.

- Enhance community gathering places as resilience hubs.
- Protect and adapt Spokane's parks, open spaces, and shorelines.
- Expand and manage the City of Spokane's tree canopy for cooling and air quality.
- Retrofit existing buildings for cooling, air filtration, and energy conservation.
- Incentivize or require green and cool roofs to reduce building temperatures and cool pavement in place of conventional dark pavements.
- Prioritize tree canopy, cool corridors, and built shade installation on streets, public lands, and public and private parking lots.
- Improve site and building design and install treed buffers along highways and roadways to improve local air quality.
- Improve wildfire protection plans with more accurate risk maps, enhanced codes, and right tree, right place concepts.

3.4.4 Significant Unavoidable Adverse Impacts

Land Use, Urban Form, Environmental Justice

Over time, Spokane is expected to experience continued growth, with development gradually becoming more intense in terms of height, bulk, and scale under all alternatives. This shift from lower-intensity to higher-intensity development is a natural and expected outcome of urban population and employment growth. No significant, unavoidable adverse impacts on land use patterns, compatibility, or overall urban form are anticipated under any alternative.

Future growth is likely to result in temporary or localized land use impacts as development occurs. More growth could occur in proximity to noise sources or light and glare sources and in areas where there are heat island effects. The potential impacts related to these changes may differ in intensity and location in each of the alternatives and many are expected to resolve over time. Application of the City's adopted or new development regulations and zoning requirements, including climate mitigation and adaptation measures, are anticipated to sufficiently mitigate these impacts.

Cultural Resources

All the alternatives have the potential for significant adverse impacts to cultural resources in the analysis areas. Proactive surveys and consideration of impacts to historic and cultural resources results in more effective identification, planning, and protection than reactive responses to inadvertent discoveries during project implementation. A well-designed and implemented citywide historic preservation plan and pre-project historic and cultural resource review process is the most effective way to avoid, minimize, or mitigate adverse impacts.

3.5 Population, Employment, and Housing

This section addresses the City of Spokane's population and demographic characteristics, housing types and numbers, and employment types and numbers. The thresholds of significance in this section include:

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

Other EIS sections address the compatibility of existing and future households near air pollution and noise sources, respectively **Sections 3.2 Air Quality and Greenhouse Gas Emissions** and **3.4 Land Use Patterns and Urban Form**. In addition, the increase in growth in areas with social disparities and demand for public services is addressed in **Section 3.8 Public Services**.

3.5.1 Affected Environment

Citywide

Population and Households

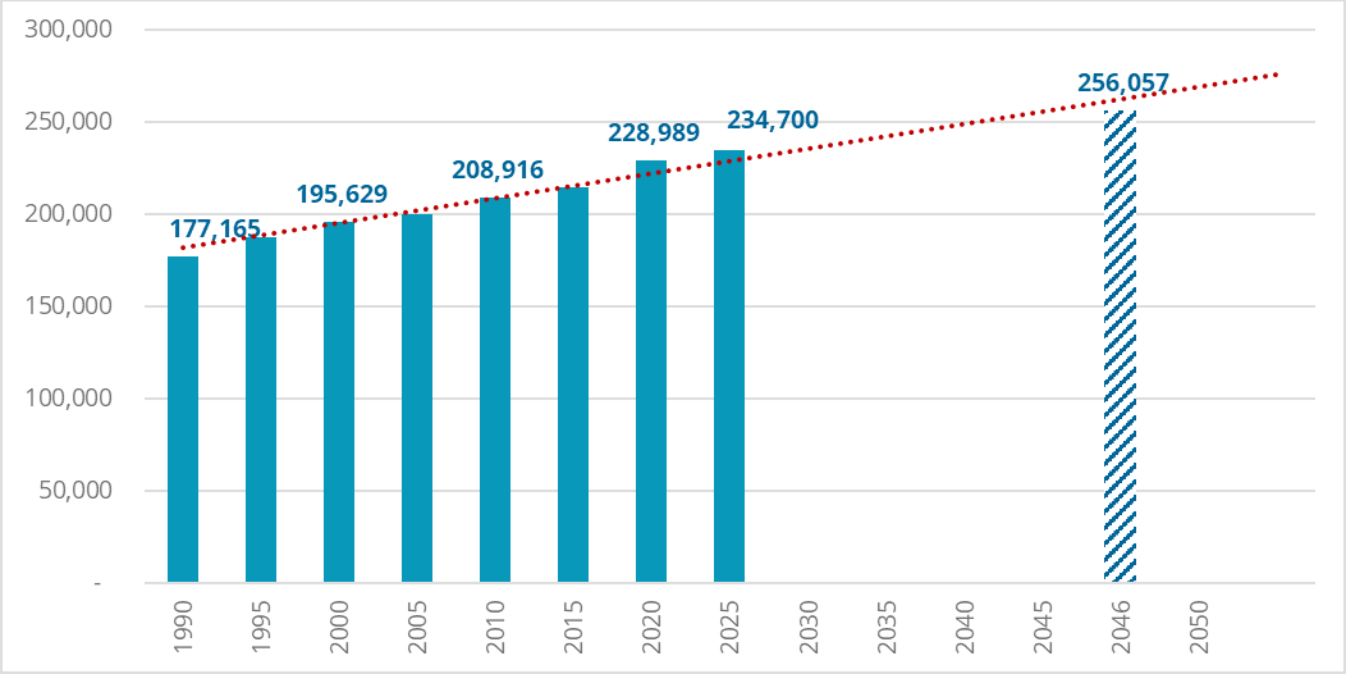
Population Growth Trends

Prior to white settlement, the Spokane area was home to the Spokane Tribe of Indians' ancestors. The Spokane and Columbia River corridors and the tributaries in much of northeastern Washington were places for Tribal hunting, fishing, and gathering. During salmon runs, other tribes joined the Spokanes at the falls for fishing, trade, games, celebration, and socializing. See also **Section 3.4.1 Affected Environment, Cultural Resources**.

The City of Spokane incorporated in 1881 with a population of around 350 but by the 1890 U.S. Census it had a population of 19,922. In 2025, it is the second largest city in the state. Recent population growth shows that from 1990-2025 the city grew at a rate of 0.8%. The city is expected to grow 9.1% between 2025 and 2046. The population target growth between 2023 and 2046 is 23,357 people, an annual growth rate of 0.4%. (Steering Committee of Elected Officials, 2024) See **Exhibit 3.5-1**.

More description of the population target is found in **Chapter 2**, **Section 2.2.3**.

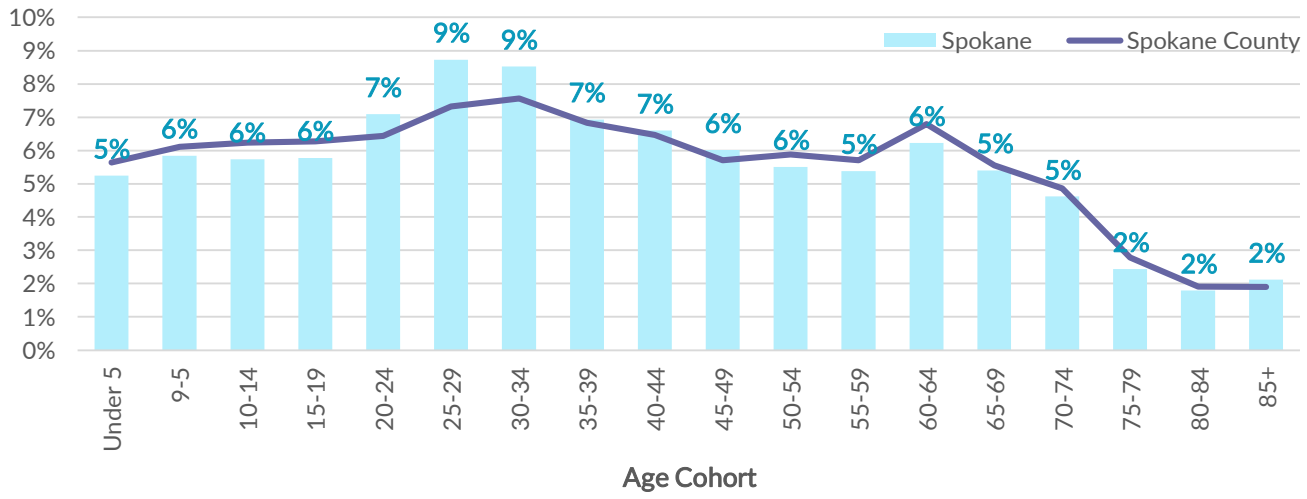
Exhibit 3.5-1. Population Growth 1990-2025 and Future Growth to 2046



Sources: OFM 2025; BERK 2025.

Likely due to the number of universities, the city has a relatively larger number of young adults compared to the county; otherwise, the city has similar shares of ages. See **Exhibit 3.5-2**.

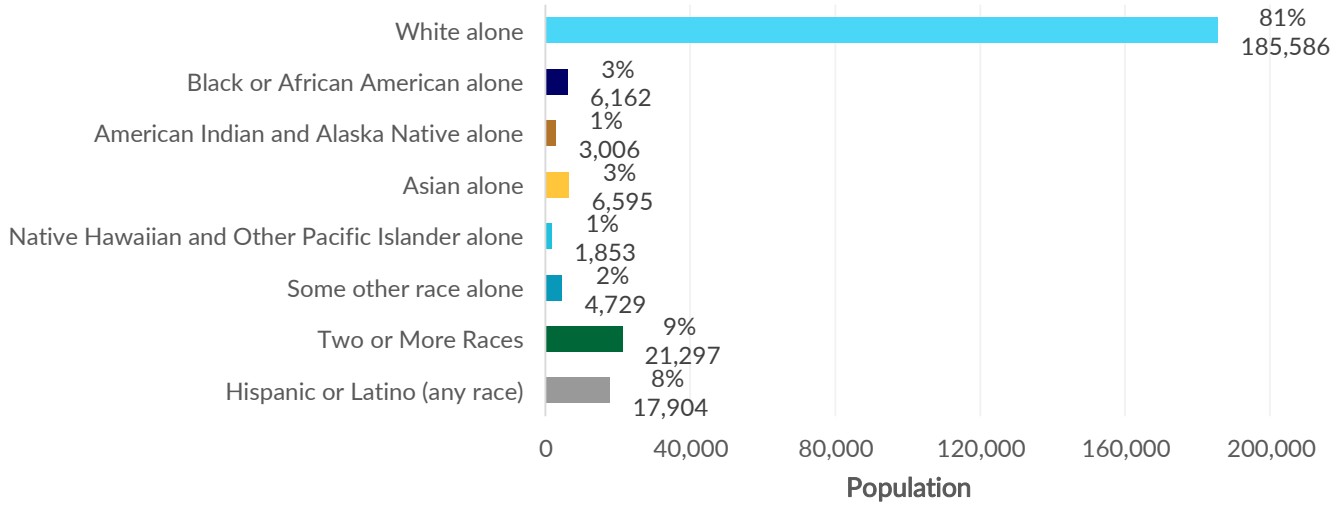
Exhibit 3.5-2. Age Structure, City of Spokane + County Comparison (ACS S0101) 2019-2023



Source: U.S. Census Bureau, 2019-2023 American Community Survey 5-Year Estimates.

The population is majority white population but has a slightly higher share of non-white residents than the county as a whole. See **Exhibit 3.5-3.**

Exhibit 3.5-3. Race and Ethnicity – City of Spokane (2019-2023)



Source: U.S. Census Bureau, 2019-2023 American Community Survey 5-Year Estimates.

Household Characteristics

Citywide

Approximately two thirds of Spokane's occupied housing stock is single-unit and one third is multi-unit. Multi-unit housing is typically 5+ housing units or greater per building, and less frequently duplexes, triplexes, and fourplexes. Household sizes typically vary by dwelling type, with higher persons per household in single-unit dwellings and lower persons per household in attached dwellings. See **Exhibit 3.5-4**.

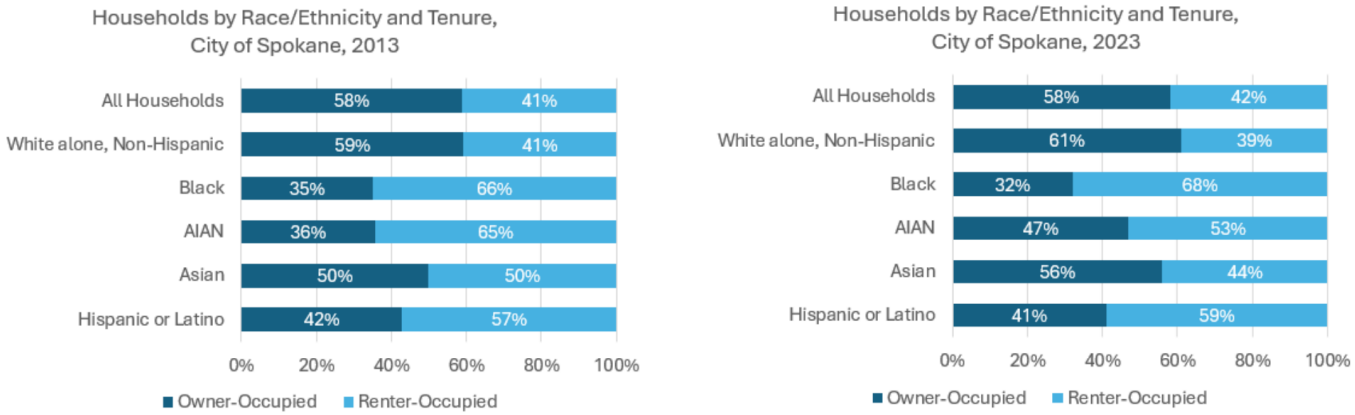
Exhibit 3.5-4. Persons per Household 2022

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

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

Homeownership rates remained consistent at 57% owner-occupied and 43% renter-occupied for all households in the City of Spokane between 2013 and 2023. Homeownership rates increased for all racial groups since 2013 except for Black households and Hispanic and Latino households, which decreased by 3% and 2%, respectively. See **Exhibit 3.5-5**.

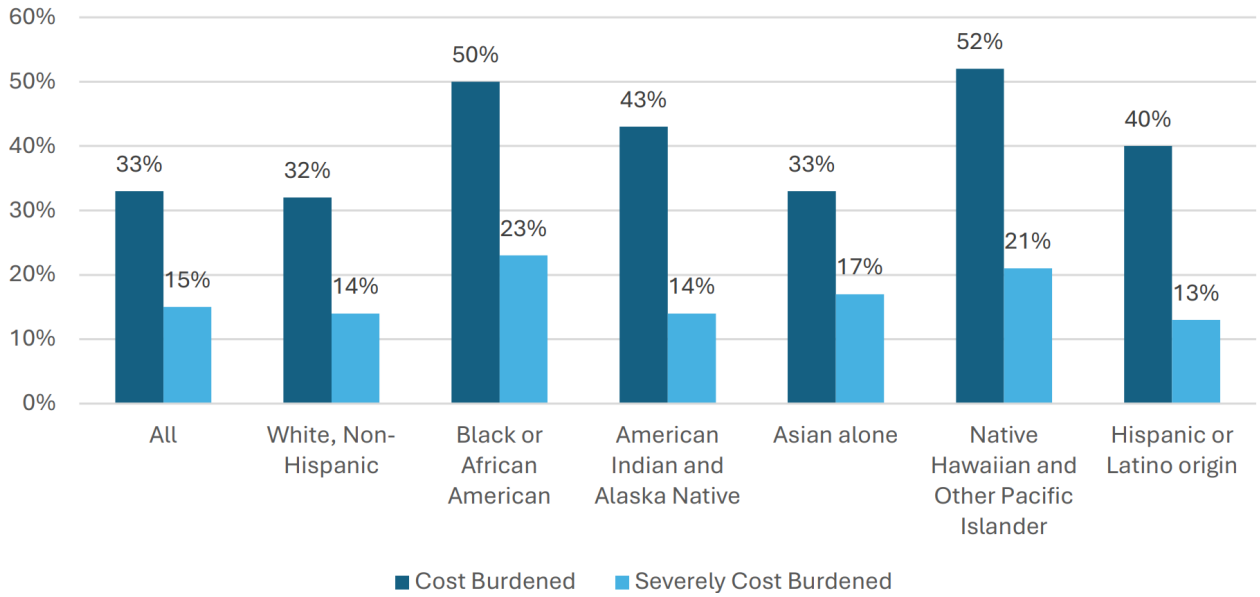
Exhibit 3.5-5. Citywide Proportion of Households by Income and Tenure 2013 and 2023



Notes: American Indian and Alaska Native AIAN; Native Hawaiian and Other Pacific Islander households were omitted due to the margin of error in 2013 exceeding the population estimates. Sources: U.S. Census Bureau; U.S. Department of Commerce; American Community Survey 2023: 5-Year Estimates and 2013: 5-Year Estimates, Table S2502. Published by: (City of Spokane, 2025)

Cost burden refers to households that spend more than 30% of their income on rent and utilities and who earn less than 80% of the area median income (AMI). Large shares of all renter households, at least 40%, are cost burdened, with Black and Native Hawaiian and Other Pacific Islander (NHOPI) renter households substantially more cost burdened than other racial groups. For owner-occupied and households, Hispanic and Latino and Asian households have slightly higher cost-burdened rates than other races. See **Exhibit 3.5-6**.

Exhibit 3.5-6. Cost-Burden by Race and Ethnicity and Tenure, City of Spokane, 2019-2023



Notes: American Indian and Alaska Native – AIAN, Native Hawaiian, and Other Pacific Islander - NHOPI
Sources: U.S. Census Bureau; U.S. Department of Commerce; American Community Survey, 2023: 5-Year Estimates, Table B25140. Published by: (City of Spokane, 2025)

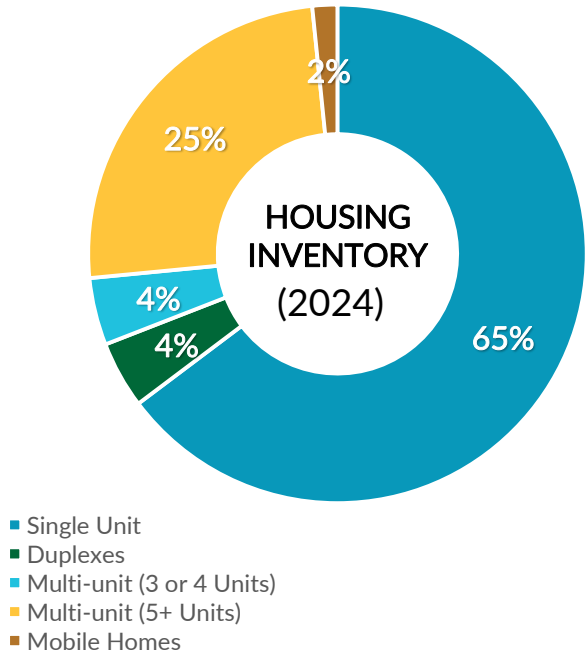
Housing

Housing Stock

Nearly two thirds of the housing stock in the city is composed of single units and about one third in multi-unit formats, typically more than five units per building. See **Exhibit 3.5-7**. Between 2013 and 2024, the city saw more multi-unit construction than single unit construction, and small amounts of duplexes and multiplexes. See **Exhibit 3.5-8**.

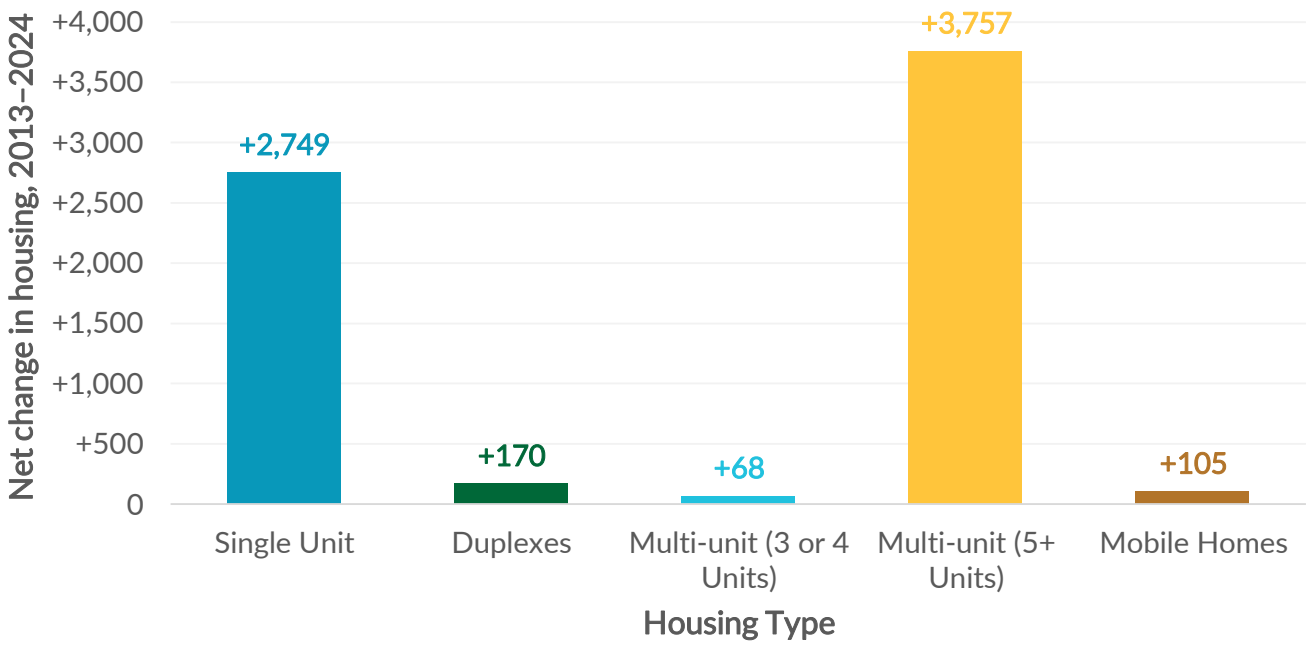
As the city has grown over time, older housing units have been replaced by newer units. However, far more units were constructed than demolished each year. Between 2010 and 2024, for every 1 housing unit demolished the city gained about 7.4 units. See **Exhibit 3.5-9**.

Exhibit 3.5-7. City of Spokane Housing Stock, April 1, 2024



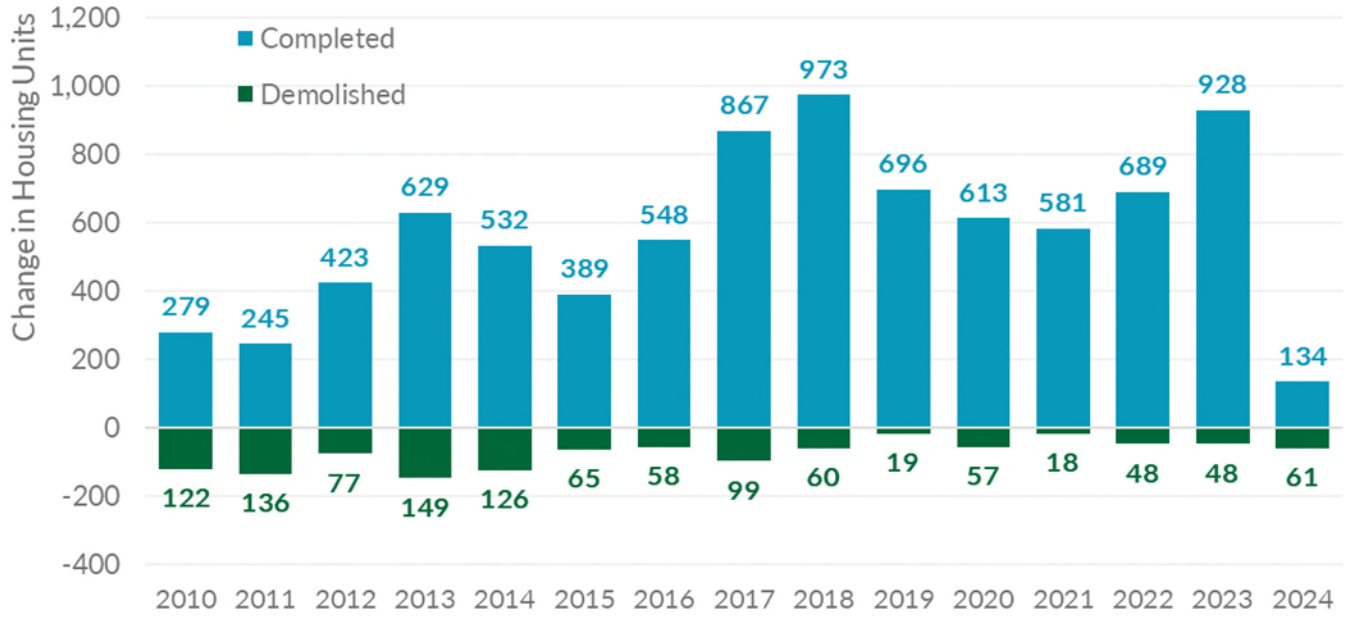
Note: OFM unit type names adjusted from single family to single unit and multi-family to multi-unit.
Sources: OFM 2024; BERK 2025.

Exhibit 3.5-8. Net Change in Housing Stock April 1,2013 to April 1,2024 (OFM)



Note: OFM unit type names adjusted from single family to single unit and multi-family to multi-unit.
Sources: OFM 2024; BERK 2025

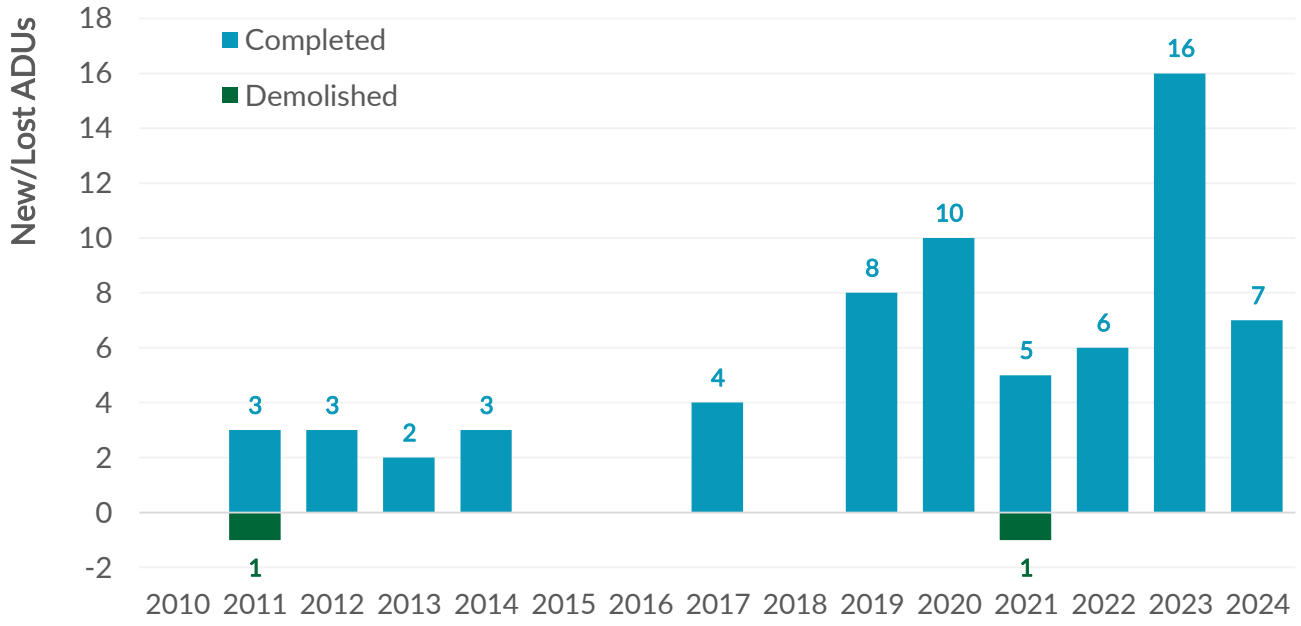
Exhibit 3.5-9. Housing Unit Completions and Demolitions – April 1, 2010 to April 1, 2024



Source: OFM 2024; BERK 2025

The city has seen limited accessory dwelling units (ADUs) being built, but a noticeable rise in accessory dwelling units were completed in the last 10 years. See **Exhibit 3.5-10**.

Exhibit 3.5-10. Accessory dwelling units completed as of April 1st of each year



Sources: OFM 2024; BERK 2025.

Housing Needs and Affordability

Housing targets for Spokane were determined based on state projections and a regional process in collaboration with other cities and Spokane County. Spokane's target includes a total of 22,359 new housing units from 2020 to 2046, as well as specific targets for each income band (see **Exhibit 3.6-2**).

Housing needs in the city were also identified in the Spokane Housing Action Plan (HAP) (City of Spokane, 2021), resulting in the following findings:

- The City of Spokane and greater region is seeing steady population and job growth. As of 2021, the HAP identified that at least 6,800 housing units are needed by 2037.
- There is an increased demand for housing for households in the moderate and middle-income ranges (80-120% AMI), that can mostly be met through single-unit attached housing. In addition, demand has increased for 2-bedroom apartments, rentals, and housing for seniors.
- Housing prices have outpaced household incomes. Based on a review of 2010-2020 data, a low vacancy rate and demand for rental and ownership housing from persons from areas with more housing wealth resulted in increases in housing prices.
- Changing household characteristics result in changing housing needs with greater elderly population (65 years +) and Millennial populations (29-44 years) likely demanding smaller sized housing as well as housing with living assistance support.

As a result of these findings, the City's strategies to meet needs included a range of activities to increase and protect affordable housing and accessibility to it. These efforts included zoning amendments to increase variety of housing types and increase densities and supply, incentive programs, partnerships, and others. In addition, the City of Spokane Community, Housing, and Human Services (CHHS) department has various programs implementing strategies. See **Exhibit 3.5-11**.

Exhibit 3.5-11. Housing Action Plan Strategies

Housing Action Plan Strategies
A. Increase housing supply, options, and affordability for all incomes.
A1. Explore and expand allowed housing types to encourage missing middle housing throughout Spokane's neighborhoods.
A2. Target efforts to increase the development of affordable housing throughout the city to support mixed-income neighborhoods.
A3. Continue to streamline and simplify changes to the City's permit process, as necessary.
A4. Leverage infrastructure and investment, including near high-performance transit stops, in Centers and Corridors, the downtown core, and other targeted areas to increase housing supply.
A5. Revise Accessory Dwelling Unit standards to allow for additional flexibility.
A6. Leverage public and partner-owned[1] land for housing, including a land bank. *
B. Preserve existing housing affordability and quality to help people thrive where they live.
B1. Expand preventative and proactive code enforcement to help maintain safe and quality housing. *
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.
B3. Enhance protections and assistance for renters, particularly the most vulnerable.
B4. Maintain and improve existing affordable rental housing.
B5. Study the local short-term rental market to reduce impact on housing affordability, neighborhood identity, and displacement.

[1] The HAP described examples of partners as Spokane Public Schools and the Washington Department of Transportation.

Housing Action Plan Strategies
C. Enhance equitable access to housing and homeownership.
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.
C2. Address racial inequities and disparities in housing. **
C3. Preserve and stabilize the viability of existing homeownership for low-income homeowners.
D. Leverage and grow partnerships to support housing initiatives across the region.
D1. Support growth management planning which best meet the Comprehensive Plan's goals and policies.
D2. Leverage partnerships within the health, education, parks, and transportation fields to support housing affordability, access to opportunity and quality of life.
D3. Grow and expand use of both local and regional housing data and analysis.

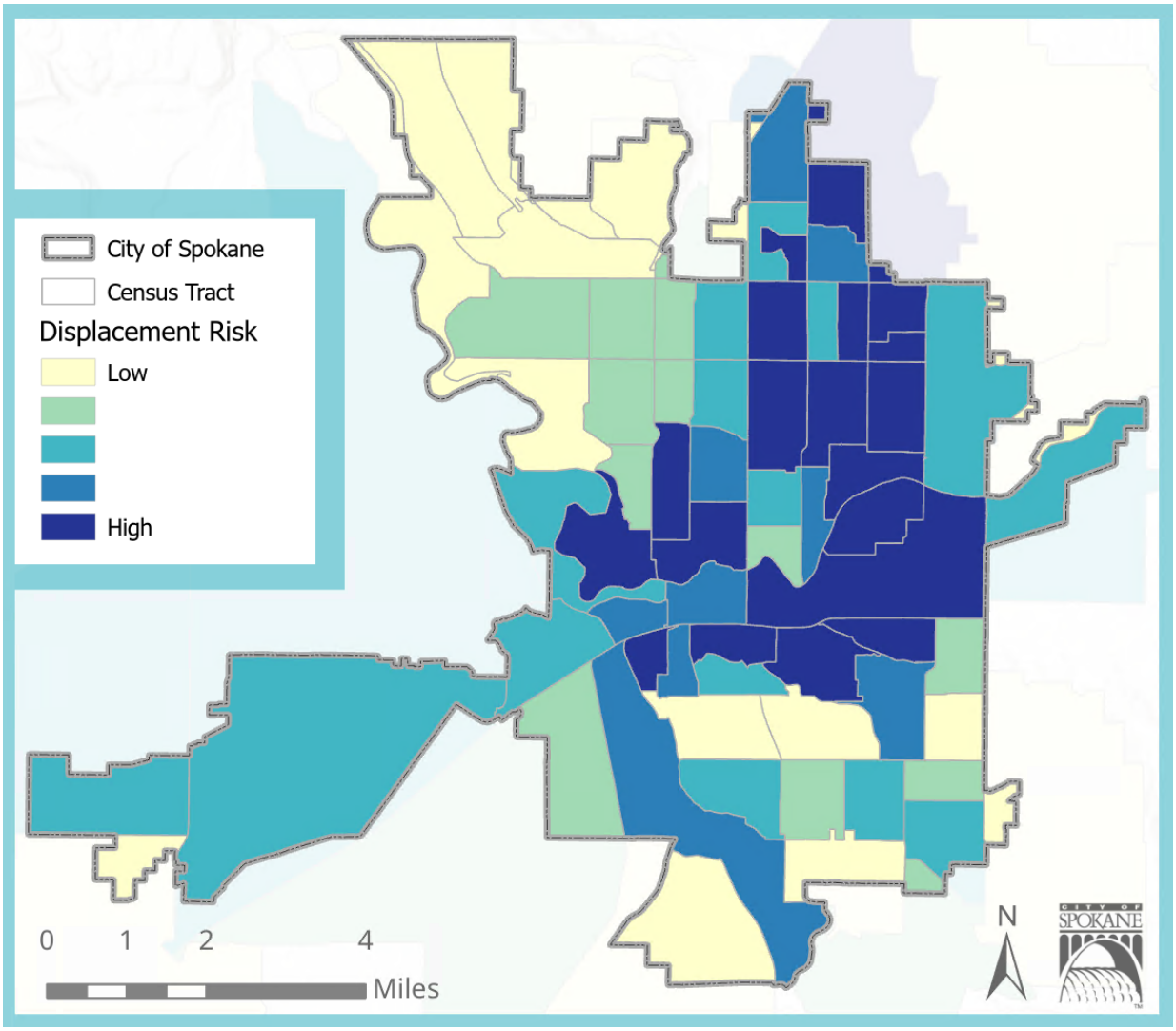
*Not yet implemented as of 2025.
**Action alternatives address racially disparate impacts requirements of HB 1220.
Source: (City of Spokane, 2021)

Displacement Risk

As part of the Periodic Update the City is examining displacement risk, which refers to when a household or business is "forced or pressured to move from their community by factors outside of their control." (Washington State Department of Commerce, 2023) Census tracts with greater potential for residential displacement are shown in **Exhibit 3.5-12.** The indicators of risk include:

- Rental affordability and availability
- Homeowner affordability
- Housing age
- Unpaid property taxes
- Access to services
- New development and future development pressure

Exhibit 3.5-12. City of Spokane Displacement Risk Map 2025



Source: (City of Spokane, 2025)

There are several causes of displacement:

- Economic displacement: Displacement due to inability to afford rising rents or costs of homeownership like property taxes.
- Physical displacement: Displacement resulting from eviction, acquisition, rehabilitation, or demolition of property, or the expiration of covenants on rent- or income-restricted housing. Climate-related displacement, such as increasing flood risk, dangerous heat, or forest fire, falls into this category. The potential risks due to changing climate could result in an inability to insure a property which could impede securing a mortgage.
- Cultural displacement: Residents are compelled to move because the people and institutions that make up their cultural community have left the area.

The Housing Action Plan (City of Spokane, 2021) found increasing housing costs and low availability (low vacancy) in the city could lead to economic displacement. Physical displacement due to development could occur with rehabilitation or demolition of housing units. Per **Exhibit 3.5-9**, comparing units built to units demolished there has been an 11% rate of demolitions over the 2010-2024 period (7,579 units completed divided by 808 demolished=11%), with 62% of demolitions being single-unit and 38% of demolitions related to multi-unit development.

Evaluation of Current Policies under State Laws

Racially Disparate Impacts (RDI) Policy Evaluation

Based on the data analysis provided in the City of Spokane Racially Disparate Impacts Report (City of Spokane, 2025), there is determination that the City has perpetuated racially disparate impacts, stemming from historic policies and practices that continue to impact residents' abilities to access housing and opportunities. The City has made recent progress through land use and code changes that begin to undo the impacts of racially disparate impacts. Policy analysis is important to change policy direction. The first lens for policy evaluation focuses on actions the policies support or prohibit, using the questions below for consideration. The second lens focuses on the narrative effect of the policy and whether it furthers harmful biases about groups of people and communities. Racial bias is a predisposition for or against based on unconscious associations about people based on race, whether intentional or unintentional.

Questions for Consideration:

- Is the policy effective in accommodating needed housing?
- Does the policy contribute to racially disparate impacts? Displacement? Exclusion in housing?
- Who benefits and who is burdened by the policy?
- Does the policy increase displacement risk? If so, can this be mitigated through policies or actions?
- Does the policy provide vulnerable communities protection from displacement?
- Does existing terminology encode bias, racially informed presumptions or phrases that promote exclusion?

In total, 29 policies were evaluated in the Housing Element, as of August 2025, with the following assessment: 10 of the policies were found to be supportive, 16 were found to be approaching, and 3 were found to either be challenging or not applicable. See **Exhibit 3.5-13**.

Exhibit 3.5-13. Summary of RDI Policy Evaluation

RDI Criteria	Evaluation	Policies Identified
The policy is valid and supports meeting the identified housing needs. The policy is needed and addresses identified racially disparate impacts, displacement, and exclusion in housing.	Supportive	10
The policy can support meeting the identified housing needs but may be insufficient or does not address racially disparate impacts, displacement, and exclusion in housing.	Approaching	16
The policy may challenge the jurisdiction's ability to meet the identified housing needs. The policy's benefits and burdens should be reviewed to optimize the ability to meet the policy's objectives while improving the equitable distribution of benefits and burdens imposed by the policy.	Challenging	2
The policy does not impact the jurisdiction's ability to meet the identified housing needs and has no influence or impact on racially disparate impacts, displacement, or exclusion.	Not Applicable	1

Source: (City of Spokane, 2025)

Once policies are revised in the Comprehensive Plan, additional analysis and implementation will be done through development regulations with clear and achievable incentives, strategies, actions, and regulations that help move toward goals. There are likely supportive and conflicting regulations within the Spokane Municipal Code as well. Review and updating of development regulations will come as part of the adoption of PlanSpokane 2046 in 2026.

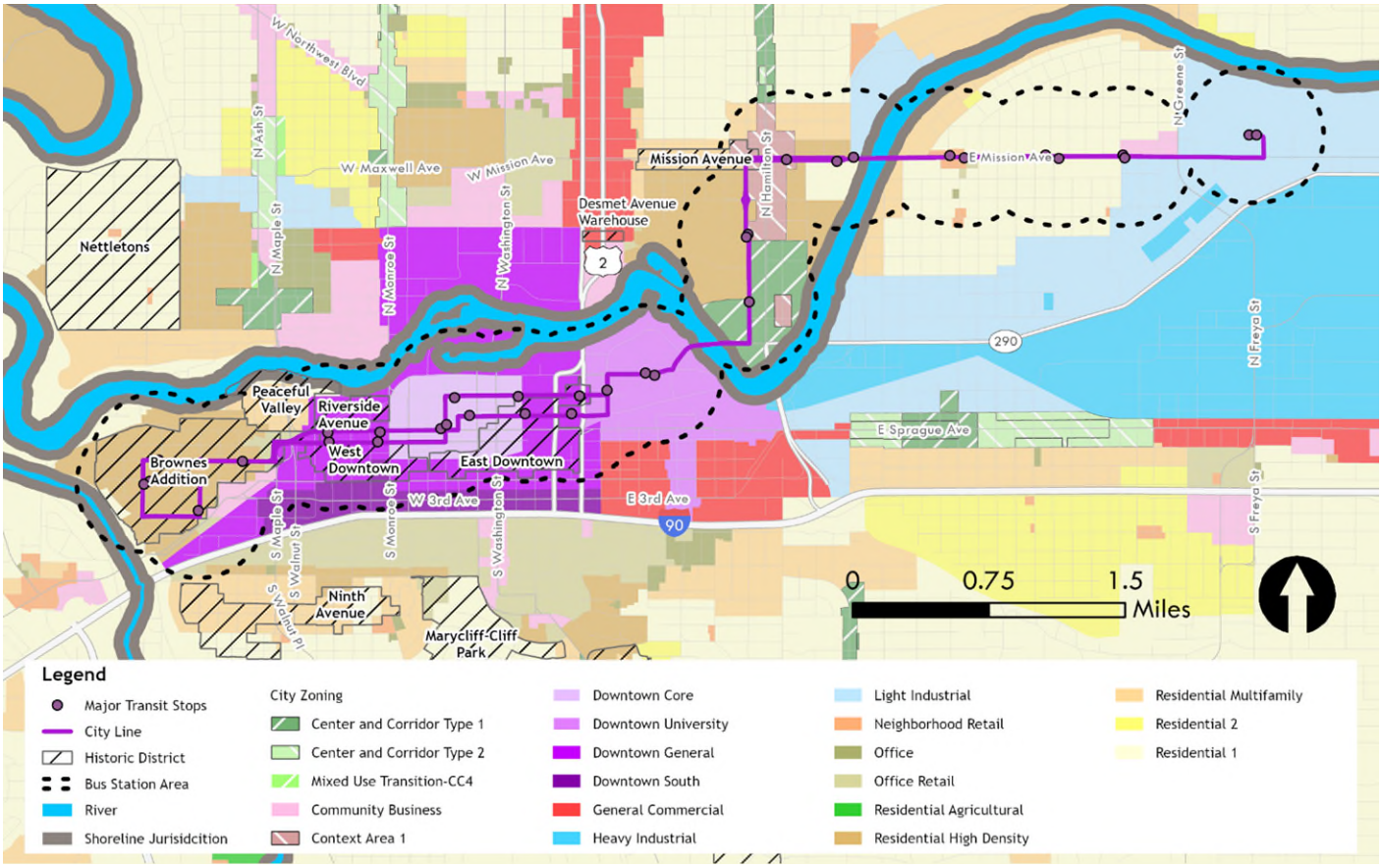
Bus Rapid Transit and Housing Densities and Displacement

Under HB 1491(2025), a city may not prohibit the siting of multifamily residential housing on lots where any other residential use is permissible within one-quarter mile of a bus station area (bus rapid transit) like along the existing City Line, or in the future, along the planned Division Bus Rapid Transit Line. HB 1491 requires a minimum floor area ratio[2] (FAR) of 2.5 applicable to residential and mixed-use development in a bus station area.[3] A city may exempt areas with shorelines or critical areas or where there is a locally designated landmark or historic district established under a local preservation ordinance; the FAR minimum is 3.0 on average if a city exempts up to 25% of bus station areas.

[2] Building square footage divided by the developable property square footage.
[3] Fully or partially within one-quarter mile walking distance of a stop on a fixed route bus system that is designated as a bus rapid transit stop.

Additional FAR must be provided for housing made of mass timber. A minimum 10% of units must be affordable for at least 50 years and such buildings are allowed another 1.5 FAR. An extension to delay implementation is allowed for up to 5 years if the areas are at high risk for displacement, as certified by the Department of Commerce.[4] The City Line and buffer of a quarter mile with underlying zoning is provided in **Exhibit 3.5-14**.

Exhibit 3.5-14. Center Line BRT and Quarter Mile Buffer with Current Zoning 2025



Source: City of Spokane, 2025.

Areas that could be exempted include:

- Land within the Spokane River shoreline management area (200 feet of ordinary high-water mark).
- Land within Browne's Addition local historic district (it is also a national historic district). There are other national register districts (West Downtown, East Downtown, Peaceful Valley, Riverside Avenue). Section 17D.100.230 of the Spokane Municipal Code addresses demolition permits for

[4] The City of Spokane shows moderate to high displacement risk in the census tracts along the route. Commerce's displacement risk map differs to some degree but also shows moderate and high risk.

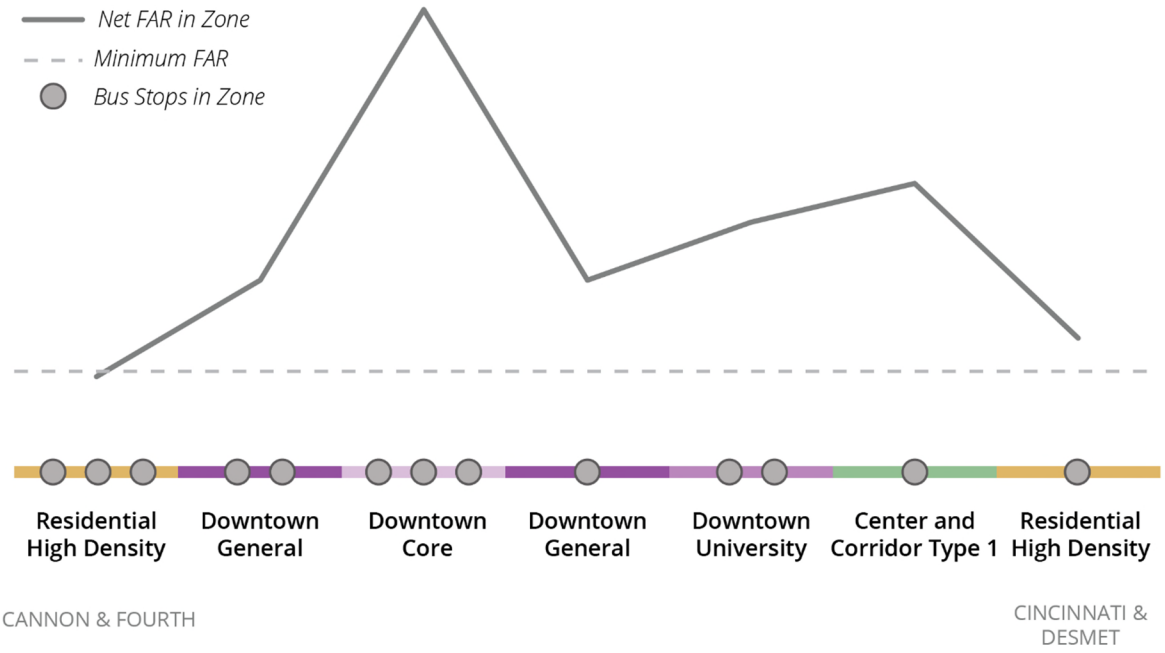
historic structures located within the downtown boundary area, National Register historic districts, and centers and corridors.

- Industrial lands if the zoning limits housing to one dwelling per lot or for caretakers. Within one quarter mile of the river, the City's LI and HI zones allow group living (LI) and residential household living (LI and HI) subject to standards like access to the river, though it is unlikely in the Chief Gary Park area given presence of Avista and Spokane Community College campuses. Areas where housing is not allowed beyond caretaker housing can be excluded.

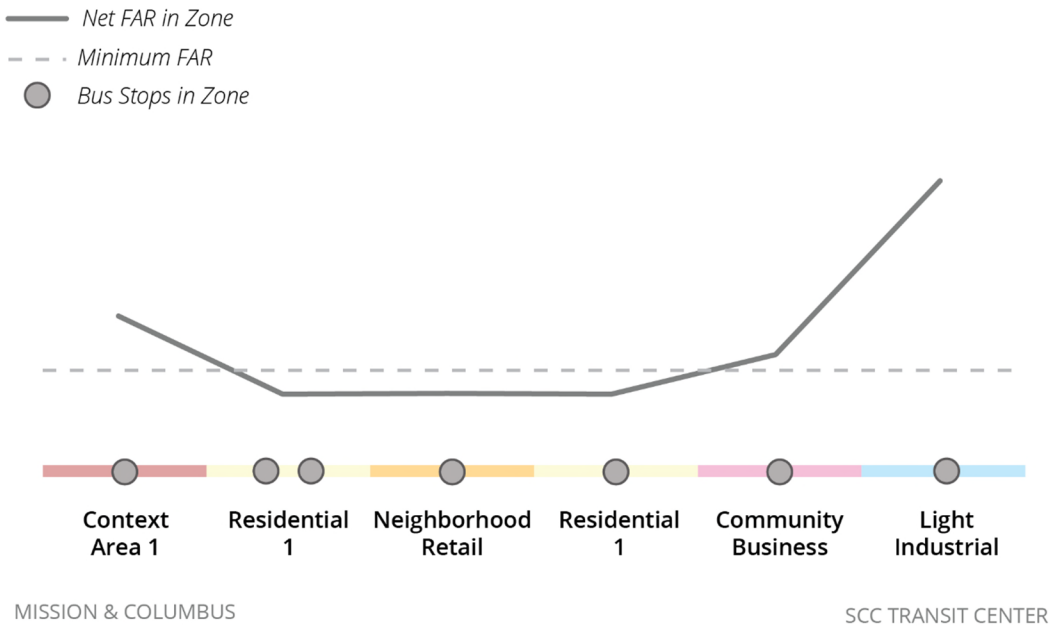
With no areas excluded, the current average FAR is 8.9. Excluding shorelines, local historic district, and industrial zones the current average FAR would be 6.3, with a conservative analysis of heights, still double the minimum 3.0 FAR. However, this is an average across all station areas, which includes areas of high intensity on the western portions of the City Line and lower intensity areas. Some station areas may not meet the minimum FAR. See **Exhibit 3.5-15** below for a conceptual depiction of results across the stations that shows the variable results. The Washington Department of Commerce is preparing implementation guidelines, and the evaluation is likely to change.

Exhibit 3.5-15. City Line HB 1491 Floor Area Ratio Conceptual Evaluation (2025)

Western End of City Line



Eastern End of City Line



Sources: City of Spokane, BERK, 2025.

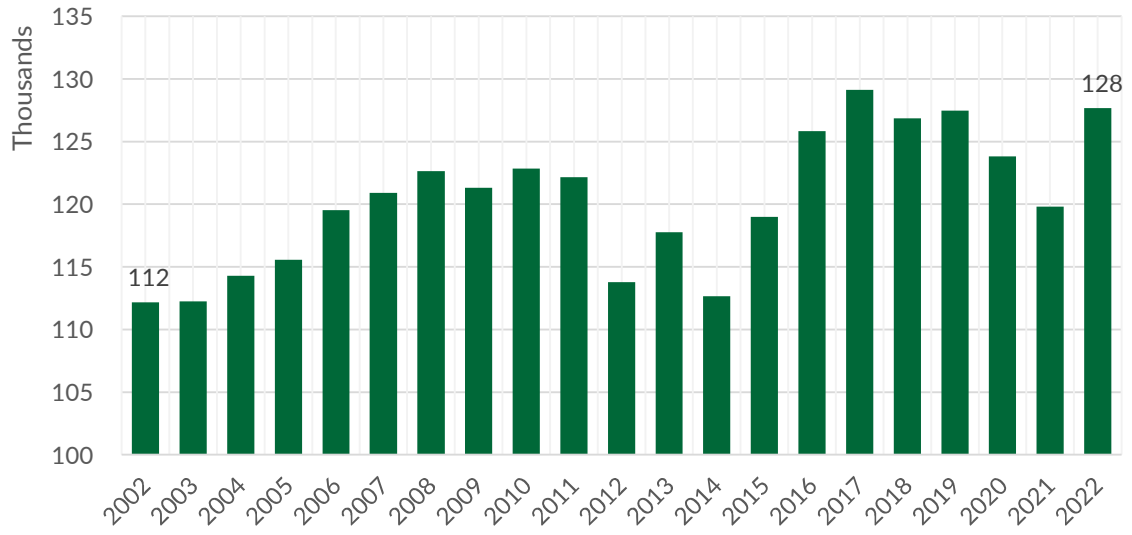
Employment

Total jobs and sectors

The city is a central job hub for the county and inland Northwest region and has approximately 128,000 jobs as of 2022. See **Exhibit 3.5-16**. In the past two decades, city employment experienced two periods of decline – in 2012 to 2014, a few years after the Great Recession and most recently from 2020 to 2021, during the COVID-19 pandemic. In 2022, employment had recovered to pre-pandemic levels.

From 2002 to 2022, city employment followed the same pattern of ebbs and flows as county employment but has consistently grown at a slower pace than the county, with 0.7% per year on average compared to 1.2% per year on average for the county.

Exhibit 3.5-16. Total Jobs 2002-2022 (in thousands)

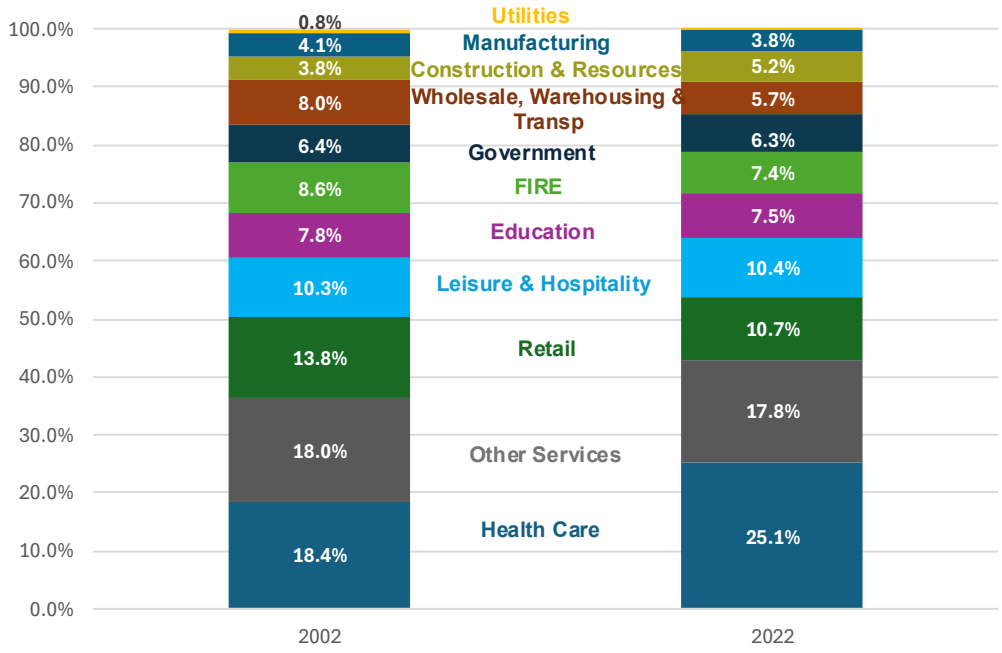


Sources: U.S. Census LEHD OntheMap, 2002-2022; BERK, 2025.

As shown in **Exhibit 3.5-17** and **Exhibit 3.5-18** the city's employment mix is service oriented with health care:

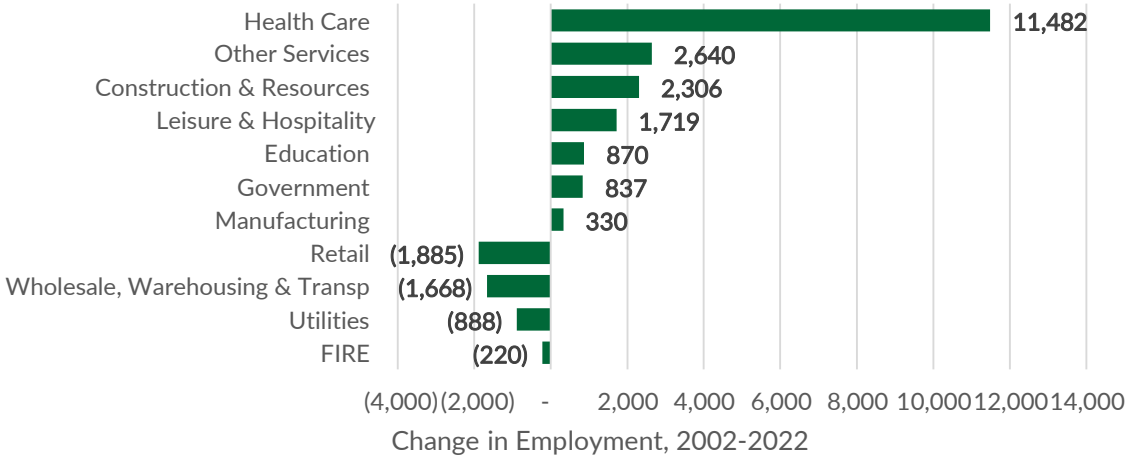
- *Health Care* and *Other Services* accounted for over 40% of the city's total employment in 2022. Health Care was by far the fastest growing industry in the City of Spokane. It added almost 11,500 jobs between 2002 and 2022, and its share increased from 18% to 25% of total citywide employment during this period.
- The *Retail* and *Wholesale, Warehousing & Transportation* industries experienced a decline of 12% and 19% respectively since 2002.
- The *Utilities* sector had a negative change in employment from 2002 to 2022, mostly because of the reclassification of the majority of Avista's office-type employment from Utilities to Other Services in the job data. Thus, it is not a true decline.

Exhibit 3.5-17. Employment by Industry, 2002 and 2022



Notes: FIRE stands for finance, insurance and real estate, rental, and leasing. Other Services includes information, professional, scientific, and technical services, management of companies and enterprises, administrative and waste management, and others.
Sources: U.S. Census LEHD OntheMap, 2002-2022; BERK, 2025.

Exhibit 3.5-18. City of Spokane Employment Change by Industry, 2002 - 2022



Notes: FIRE stands for finance, insurance and real estate, rental, and leasing. Other Services includes information, professional, scientific, and technical services, management of companies and enterprises, administrative and waste management, and others.
Source: U.S. Census LEHD OntheMap, 2002-2022; BERK, 2025.

The Workforce Council has provided job sector projections for the year 2034 that anticipates nearly 16,000 new jobs between 2024-2034. Over 35% of the new jobs are anticipated to be in healthcare and another 20% in other services (information, professional, other). (Spokane Workforce Council, 2025)

City and Regional Economic Development Goals

Economic Development Plans

The City's Economic Development goals are found in the current Comprehensive Plan and promote a strong and diverse economy with opportunities including available land, education, and workforce development, with the following themes of goals and policies:

- ED 1 Cooperative Partnerships
- ED 2 Land Availability for Economic Activities
- ED 3 Strong, Diverse, and Sustainable Economy
- ED 4 Income and Employment Opportunity
- ED 5 Education and Workforce Development
- ED 6 Infrastructure
- ED 7 Regulatory Environment and Tax Structure
- ED 8 Quality of Life and The Environment

The City of Spokane has planned for economic development in specific subareas that are key job centers including Downtown, Hillyard, and others. See **Section 3.6.1 Affected Environment**.

Public Development Authorities

There are three public development authorities (PDAs) in the city that are meant to promote economic development by attracting and coordinating investments, including the University District PDA in Center City, the Northeast PDA addressing the Hillyard area, and S3R3 addressing West Plains, particularly the airport. Each PDA's purpose is shared below:

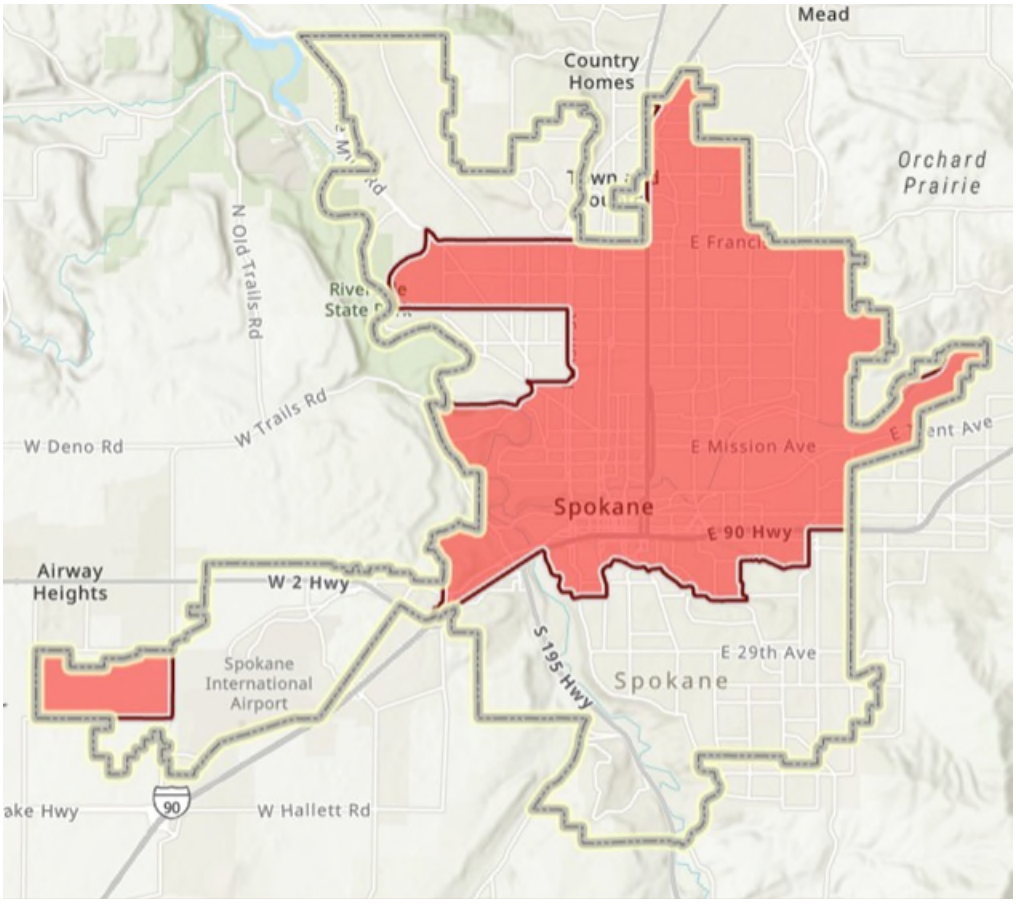
- **University District Public Development Authority:** Spokane's University District is where, "business and education grow together and the place to live, learn, work, and play in the Intermountain Northwest. …With five major universities, two medical school programs, top-notch community colleges, a nationally recognized smart city testbed, and a burgeoning life sciences ecosystem, this is an idea-generating and innovation-focused community…"
- **Northeast Public Development Authority (NEPDA):** The mission of the NEPDA is to "facilitate the redevelopment, development, and construction of public benefit projects, resulting in increased economic activity and job growth within the PDA boundary (The YARD)."
- **S3R3 Solutions (formerly known as West Plains/Airport Area Public Development Authority):** This PDA focus is "to undertake, assist with and otherwise facilitate the acquisition, construction, development equipping, leasing, operation and maintenance of public benefit projects within the

PDA boundaries…in order to assist both the City, County and the Spokane International Airport in their ability to improve the economic conditions in and around the City and County of Spokane."

Strategies & Programs

In 2022 the City of Spokane updated its economic development strategy to direct resources and incentives to the most economically distressed Census tracts, called the Spokane Target Investment Area. The Census tracts within the STIA were chosen by the criteria from the federal Community Development Financial Institutions (CDFI) Fund requirements for defining a distressed community for the New Market Tax Credit (NMTC) program. The STIA covers the geographies of all three PDAs, the City's two business improvement districts, Opportunity Zones, and Community Empowerment Zones, as well as Census tracts that are NMTC eligible. See **Exhibit 3.5-19**.

Exhibit 3.5-19. Target Investment Area



Source: (City of Spokane, 2025)

The City of Spokane has access to numerous incentive programs addressing housing and employment, including:

- **Multi-Family Tax Exemption:** A State enabled property tax exemption, the MFTE incentive allows a time-specific exemption on the property taxes for the residential improvements that create new housing. In exchange for an exemption, at least 25-30% of the created units need to be workforce rental housing or affordable owner-occupied housing. The incentive allows for differing exemption lengths – 8 years (market rate rents), 12 years (workforce rentals and affordable ownership units), and 20 years (permanent owner-occupied units).
- **Single-Unit & Detached ADU Tax Exemption:** A State enabled property tax exemption for single unit housing administered through Spokane County, the incentive allows a property owner to have the new construction value of a physical improvement to their dwelling exempt for three years following the completion of the physical improvement, including the construction of an accessory dwelling unit. The amount of exemption is the difference between the dwelling's market value before and after the improvements, not to exceed 30% of the original market value.
- **Parking 2 People:** This incentive is for the redevelopment of underutilized parking via a State enabled sales and use tax deferral, which is meant to support construction of affordable housing. Upon approval from the Department of Revenue, who issues a tax deferral certificate, an applicant is able to defer the City of Spokane's approximately 9% sales and use tax on applicable purchases related to the housing being constructed. Fifty percent of the housing constructed through this incentive is then maintained as affordable for 10 years for residents with an area median income between 80-115% AMI.
- **Commercial Building Conversion:** This incentive is for the redevelopment of underutilized and existing commercial buildings via a State sales and use tax deferral. Upon approval from the Department of Revenue, who issues a tax deferral certificate, an applicant can defer the City of Spokane's approximately 9% sales and use tax on applicable purchases related to the housing being constructed. Ten percent of the housing constructed through this incentive is then maintained as affordable for 10 years for residents with an area median income at or below 80% AMI.
- **New Markets Tax Credit Benefits:** This US Treasury program, authorized by Congress in 2000, was created to increase the flow of private sector capital to projects that create jobs and provide goods and services in distressed communities. NMTCs attract private investment by providing banks with a 39% federal tax credit over seven years. The proceeds of these investments are used as flexible, forgivable financing for a wide variety of projects, such as manufacturing/industrial, health/medical centers, education facilities, and others. The benefit to a qualified NMTC project results in a net subsidy of 20%+ of the tax credits a project attracts.
- **Historic Tax Credits:** There are incentives available to owners of designated historic properties (commercial and residential) in the City of Spokane. This includes federal tax credits, property tax waivers, and façade grants. For designated historic properties in Spokane, the Special Valuation Tax incentive supports rehabilitation of historic properties by providing a 10-year property tax reduction. This incentive can be combined with MFTE or Federal Historic Tax Credits.

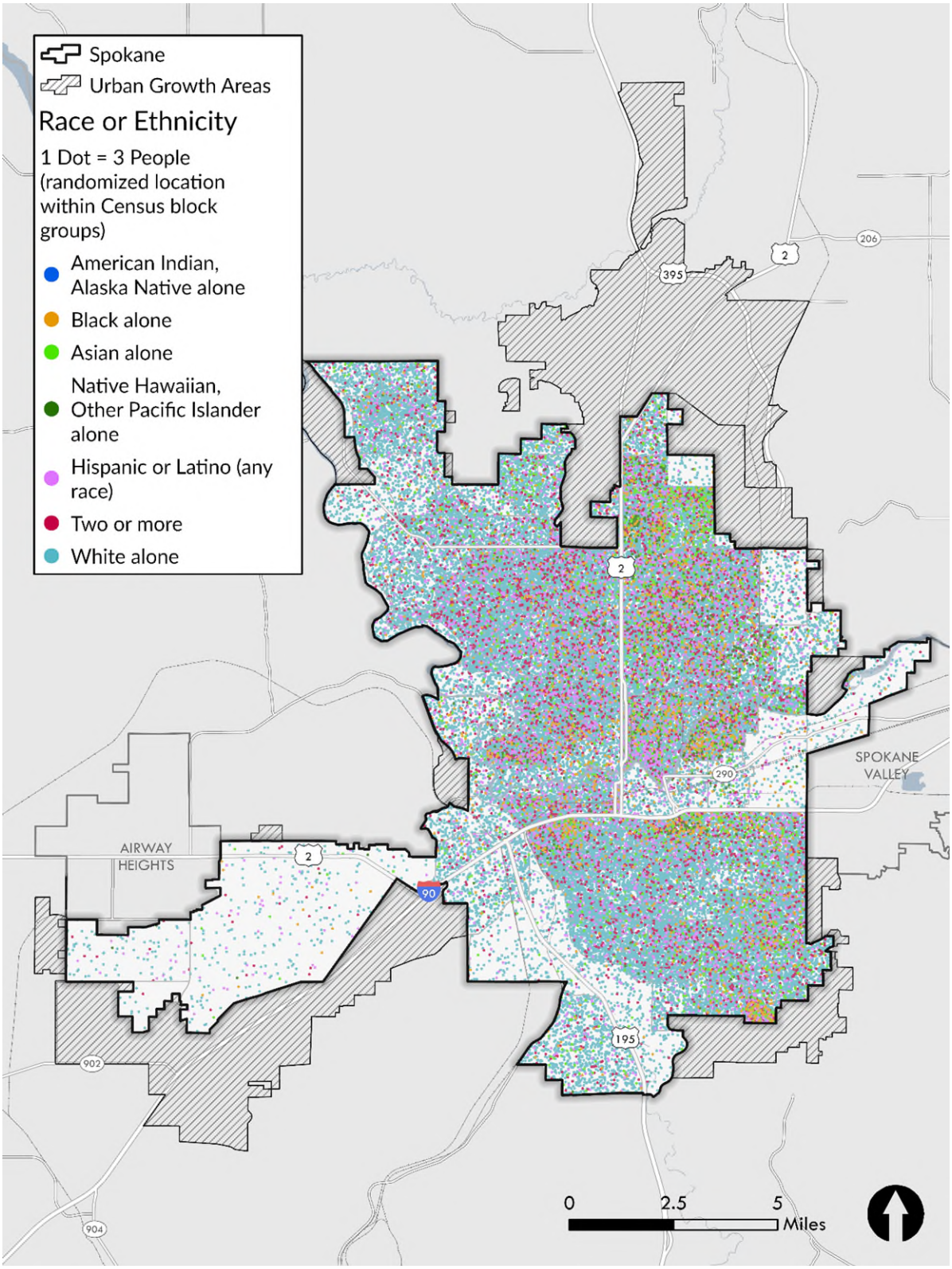
- **Opportunity Zones:** Opportunity Zones (OZs) are a community development program established by Congress to encourage long-term investments in low-income and urban communities. Under the 2017 Opportunity Zones program, the City of Spokane was able to have 11 census tracts designated by the federal government for qualified OZ investment. The City is working with the Governor's Office to renominate census tracts under the renewed Opportunity Zone legislation passed by the One Big Beautiful Bill. The existing and future census tracts are aligned with the Spokane Target Investment Area, and the City's economic development strategy to support investment in areas that have suffered disinvestment.
- **Brownfields Program:** Through partnership with the Environmental Protection Agency (EPA), the City of Spokane applies for EPA-funded Brownfields grants that fund work to evaluate if development, expansion, or redevelopment of property within the City might be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Property owners can get financial assistance completing environmental site analysis, as well as technical assistance from city staff and EPA staff. Examples of brownfield projects in Spokane include the Riverpoint Campus east of Downtown, Kendall Yards, and Riverfront Park.
- **Commercial Property Assessed Clean Energy + Resiliency (C-PACER):** Administered by Spokane County, this financing tool is an innovative financing mechanism to help commercial, industrial, and multi-family buildings become more efficient and resilient. Property owners have access to low interest loans, with longer payback terms, so that they can upgrade buildings to be more energy efficient.

Focus Areas

Population and Household Characteristics

Except in industrial areas or places with vacant land, there are dense populations in most parts of the city. The non-white population is more concentrated in the Northeast, Division, and Center City areas, whereas there is a greater density of the white population in the Northwest and South study area. Given the airport and employment uses, there is limited population in the West Plains. See **Exhibit 3.5-20**.

Exhibit 3.5-20. Population Density and Race (2020)

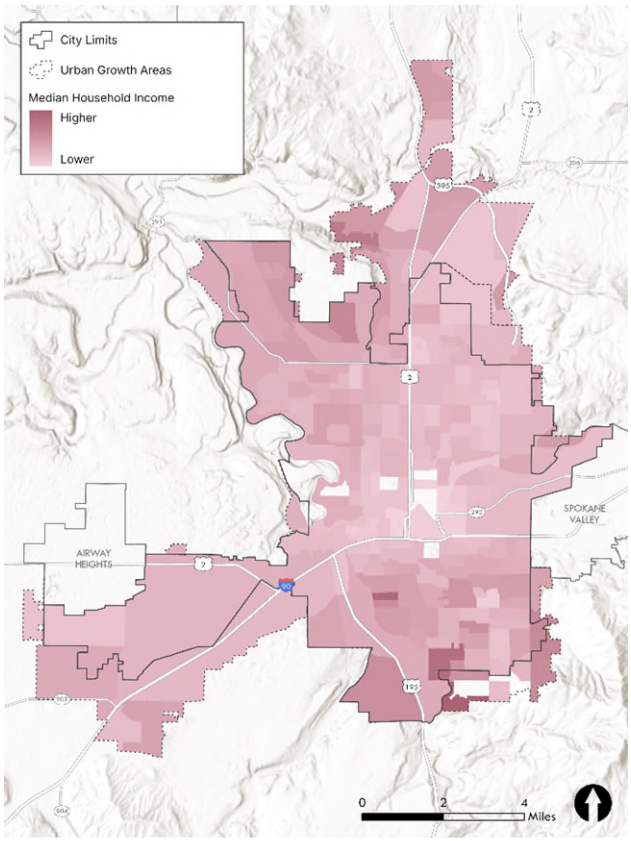


Note: Some census blocks extend into unincorporated areas.
Source: 2020 Decennial Census.

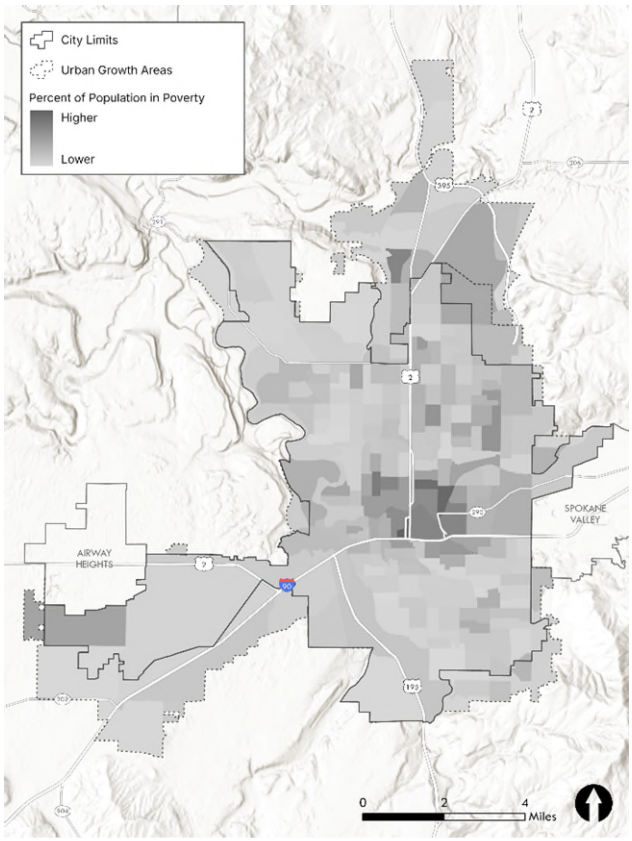
Households with higher median incomes tend to live in South Spokane. Households with greater levels of poverty tend to be concentrated in the Center City and Northeast study areas. See **Exhibit 3.5-21**.

Exhibit 3.5-21. Income and Poverty

Median Household Income 2022



Percent of People Living in Poverty 2022



Sources: ACS 2022 5-Year estimates for block group, Table B19013 and ACS 2022 5-Year estimates for block group, Table B17021.

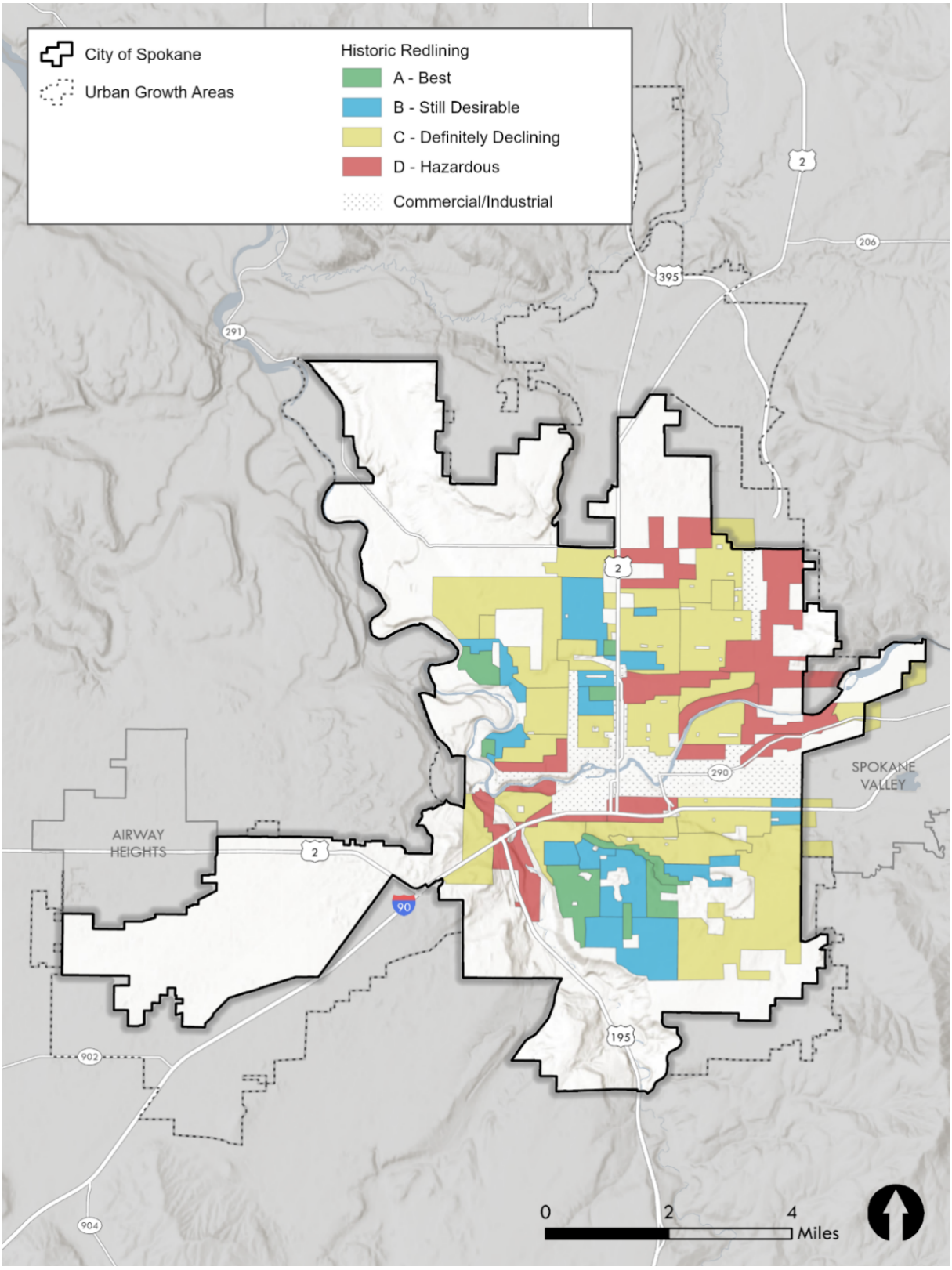
Neighborhood and Housing Condition and Affordability

Redlining is a "ranking system that categorizes neighborhoods as more or less impoverished largely based on the race of the residents. Government maps were created so that banks could determine where it was a "safe" bet to lend money to residents." (Nelson, R. K., Winling, L, et al., 2023) As shown in **Exhibit 3.5-22**, areas of Spokane were categorized into "grades" – the first grade in green signified the lowest risk for lending, and the fourth grade, indicated in red, signified a "hazardous" risk area for lending. The City's Racially Disparate Impacts Analysis, found that "exclusionary zoning enacted by the City of Spokane reinforced the impacts of redlining and racially restrictive covenants, wherein redlined areas historically had a lower percentage of single unit zoning in residential areas which had a segregating effect on BIPOC households and lower income households." (City of Spokane, 2025)

Areas that were redlined have reduced tree canopy and green spaces, lower-quality housing, and increased impervious surfaces, all of which exacerbate climate hazard risks. Redlined areas were also subjected to practices like highway construction, railroads, toxic waste siting, and other uses that have created health disparities. Redlined areas were located primarily in the Northeast and Center City as well as portions of West Plains and South study areas near US 195.

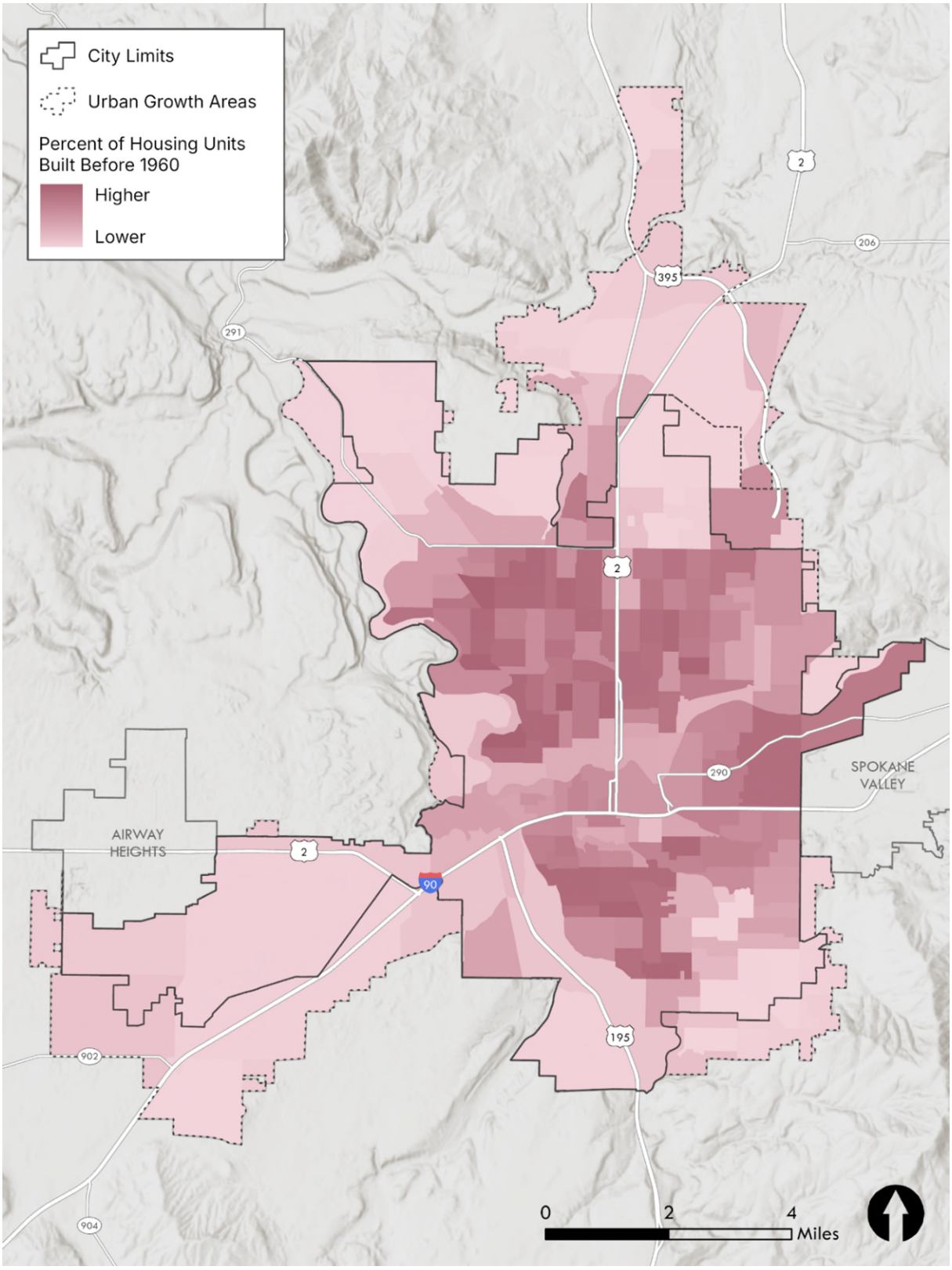
As a long-standing city, Spokane has housing stock built in all eras since the 1880s. Most housing throughout the city was built prior to 1960 and may lack more modern heating and cooling systems. See **Exhibit 3.5-23.**

Exhibit 3.5-22. Redlined Areas in City of Spokane 1938



Source: (Nelson, R. K., Winling, L, et al., 2023)

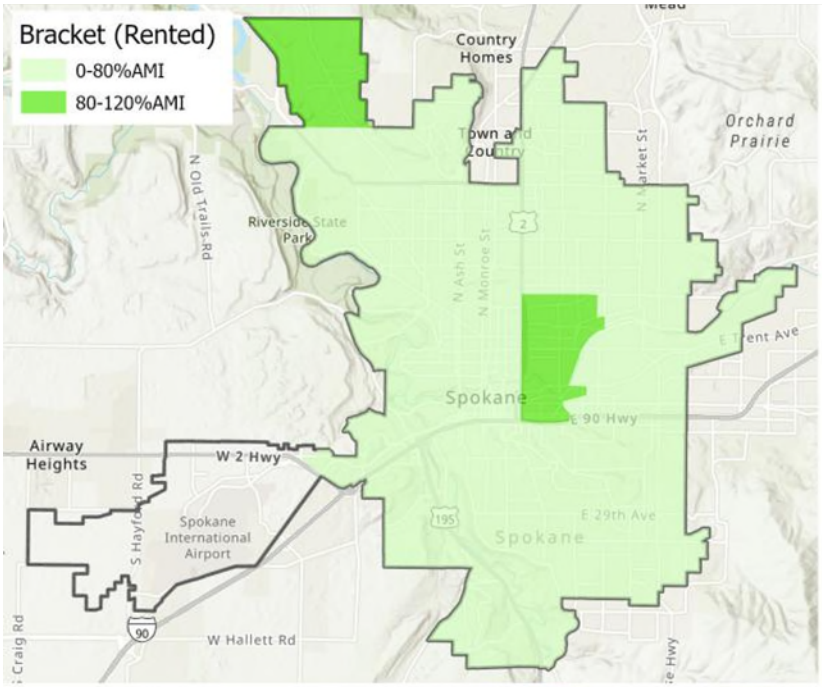
Exhibit 3.5-23. Percent of housing units built before 1960

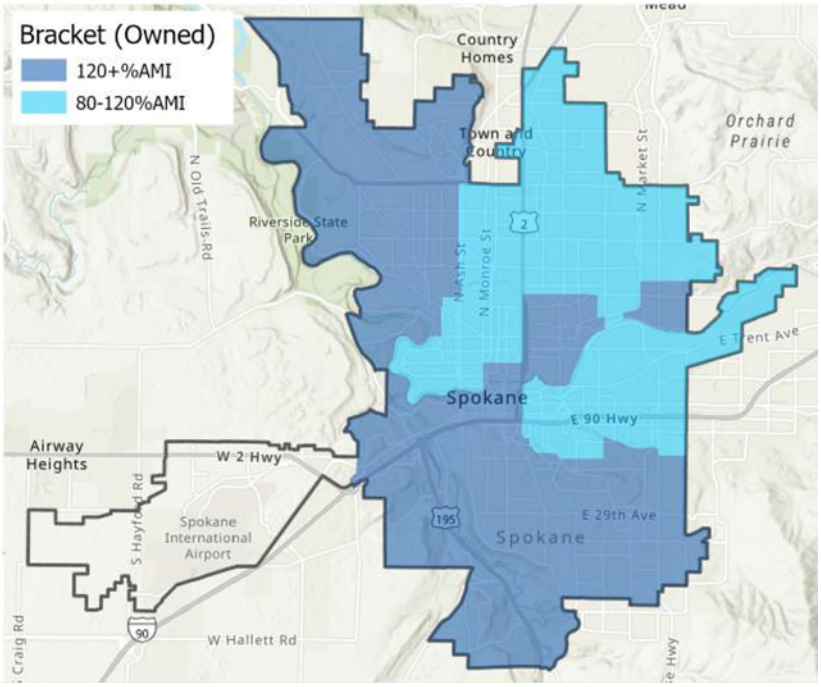


Source: ACS 2022 5-Year estimates for block group, Table B25034

Affordable rental housing is found throughout the city, though less so in the North Indian Trail neighborhood of the **Northwest** study area or Logan neighborhood of the **Northeast** study area. More affordable areas for ownership housing include most of the **Northeast** study area excluding Logan and Minnehaha neighborhoods, neighborhoods lining **Division** in the **Northwest** study area, and most of the **South** area, excluding the East Central neighborhood. See **Exhibit 3.5-24**.

Exhibit 3.5-24. Affordability of Rental and Owner Housing



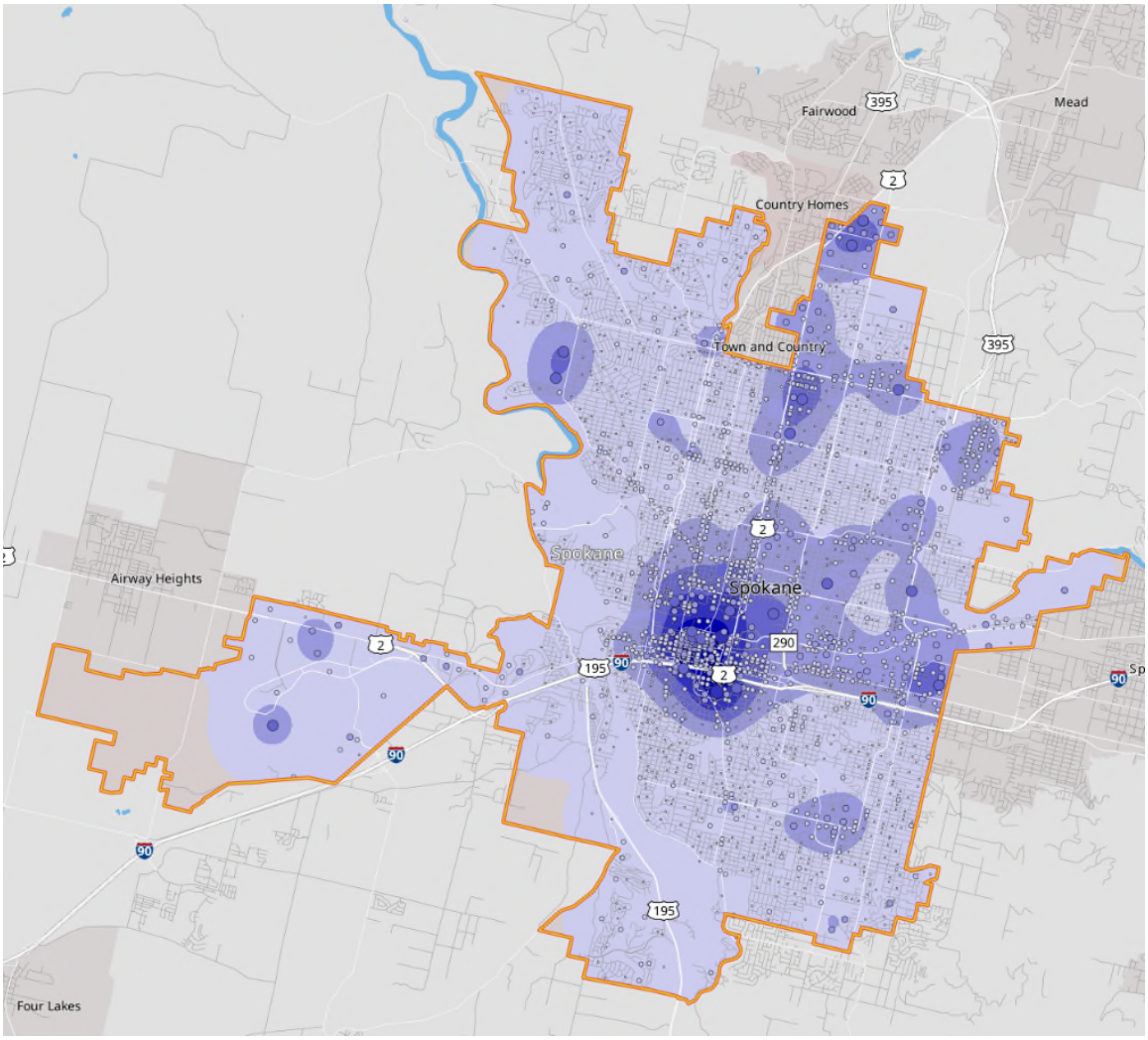


Source: (City of Spokane, June 2025)

Jobs in Study Areas

Most jobs in the city are located in Center **City** and along the **Division** corridor, as well as in the **Northwest** at the VA property and at the **West Plains** airport area. See **Exhibit 3.5-25**.

Exhibit 3.5-25. Total Jobs (2022)

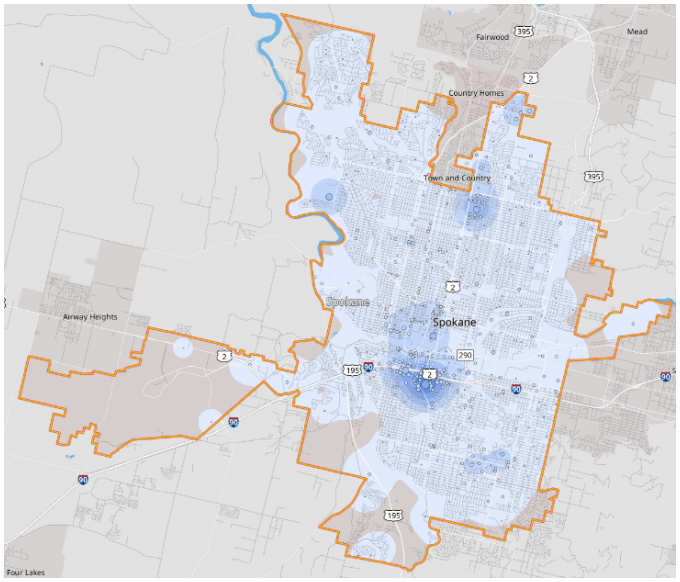
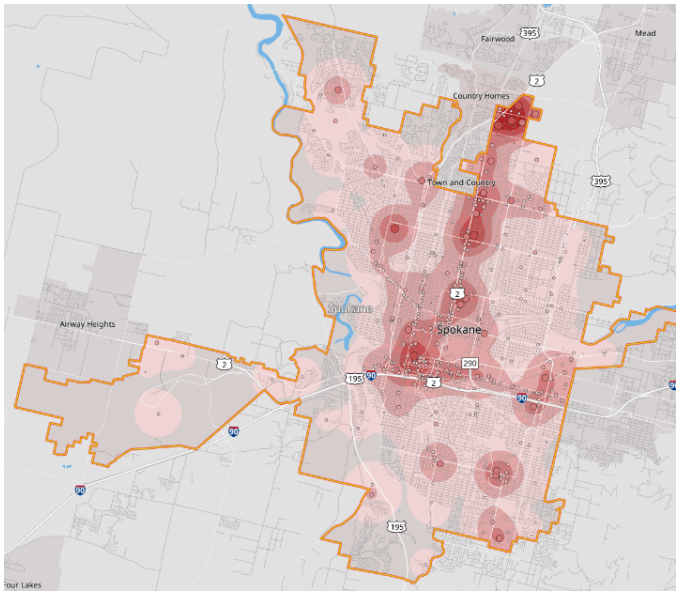
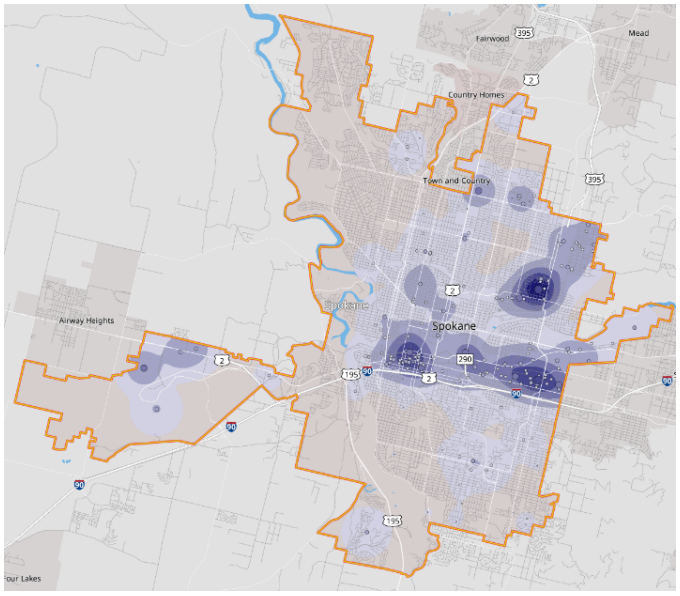
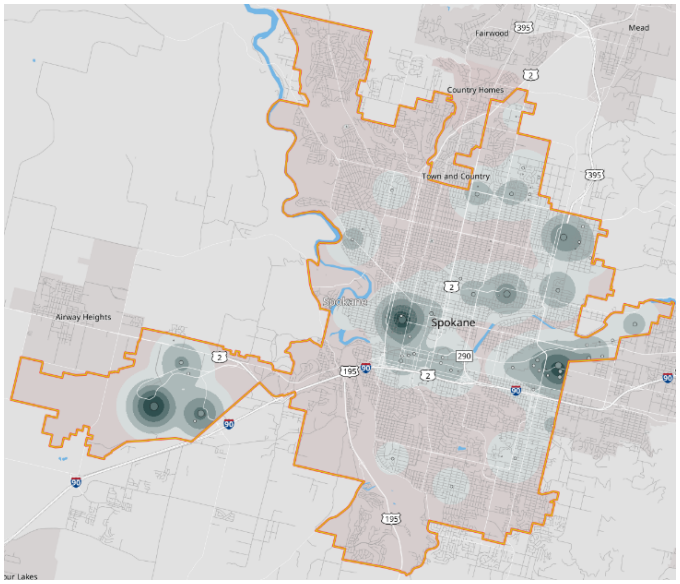


Source: Census on the Map, 2022.

When breaking down total jobs into particular sectors, clear patterns emerge about the economic ecosystem. Healthcare services are largely in the Center **City** and **Division** study areas. Retail jobs are along multiple corridors and nodes, particularly in the Center **City**, **Division**, and **Northwest** areas.

Some nodes are also found in the **South** study area. See **Exhibit 3.5-26**. Manufacturing jobs are in the Center **City** and **Northeast** study areas. Transportation and Warehousing jobs are similarly in Center City and Northeast, as well as **West Plains**.

Exhibit 3.5-26. Selected Job Sectors

Health Jobs	Retail Jobs
	
Manufacturing Jobs	**Transportation/Warehouse Jobs**
	

Source: Census on the Map, 2022.

3.5.2 Impacts

Impacts Common to All Alternatives

Citywide

Capacity for Housing and Population Targets

This sub-section addresses the following thresholds:

- Ability of the alternative to provide sufficient buildable land capacity for population and housing.

All alternatives provide capacity for more than the total housing target of 21,738 between 2022 and 2046 based on the City of Spokane's 2025 Land Capacity Analysis of Alternative 1 Stay the Course. Alternative 1 provides total capacity for 30,165 dwelling units. See **Exhibit 3.5-27**. As described in **Chapter 2**, Alternatives 2 and 3 propose to increase opportunities for low- and mid-rise housing, increasing land capacity, as well as continue Alternative 1's approach to middle housing. Once a preferred alternative is developed, new zoning would be identified and the increased land capacity determined.

Exhibit 3.5-27. Alternative 1 Land Capacity and Total Housing Target

AFFORDABILITY ANALYSIS	TOTAL
Need (HAPT*) 2020-2046	22,359
~~2021~~2020-2022 Completes**	621
Remaining Total Target: 2022-2046	21,738
Alternative 1: LCA capacity ***	30,165

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

Since the population target is similar to the housing target, and all alternatives have housing capacity exceeding the housing target, each alternative would more than meet population targets. See **Exhibit 3.5-28**.

- Population Target 2022-2046: 25,157 or 1.2 persons per household per target housing unit
- Population with Current Household Size: 50,650 or 2.33 persons per household per target housing unit

Adding the new population to the existing population (2022) moderates the household size. See **Exhibit 3.5-28**.

Exhibit 3.5-28. Population and Household Size

	BASED ON TARGETS	BASED ON TRENDS
Existing Population 2022	230,900	230,900
Net Change 2022-2046	25,157	50,650
Resulting Population	256,057	281,550
Existing Occupied Housing	95,604	95,604
Housing Target	21,738	21,738
Future Housing Units	117,342	117,342
Future PPHH	2.182	2.399

Source: OFM 2022, BERK 2025,

Spokane Complex Fire and Housing Loss

In August 2026, the Spokane Complex fire destroyed approximately 513 dwellings and more than 74 other structures within city limits, with more losses in the surrounding county. A summary of the damage is available here: REBUILD Spokane Dashboard.

The City's immediate focus is emergency response and support for rebuilding homes in affected neighborhoods. Information on rebuilding is here: https://my.spokanecity.org/wildfireinfo/rebuilding/.

The need to rebuild does not increase the City's 2020-2046 growth targets. The Comprehensive Plan sets forth long-term policies to manage future growth and provide housing opportunities and these efforts will still be implemented alongside and after fire recovery efforts.

NOTE: *This textbox was added with the Final EIS.*

Housing Variety and Affordability

This section evaluates the following thresholds:

- Ability of the alternative to increase the supply, diversity, and affordability of market-rate housing.
- Ability of the alternative to increase the supply of income-restricted housing.
- Regulatory barriers to, and insufficient capacity for, the production of affordable units needed in line with City's role / requirements under HB 1220).

Housing Variety and Affordability

Housing types accommodated by all alternatives include single unit, middle housing, and higher intensity multi units. Alternative 1 would not provide sufficient capacity in zones with potential to support new units at 0-80% AMI affordability level, with a negative balance of -5,477 as of the 2022-2046 period, which is reduced but not eliminated with subsequent housing completes information. See **Exhibit 3.5-29**.

Exhibit 3.5-29. Housing Capacity and Affordability – Alternative 1

Affordability Analysis	0-80% AMI	80-120% AMI	120+% AMI	Total
Need (HAPT*) 2020-2046	15,347	2,588	4,424	22,359
~~2021~~2020-2022 Completes**	216	116	290	621
2020-2024 Completes***	1,328	507	978	2,813
2020-2026 Completes****	4,425	906	1,247	6,578
Remaining Total Target: 2022-2046	15,131	2,472	4,134	21,738
LCA capacity***	9,654	8,036	12,475	30,165
Remaining target during EIS evaluation period 2022-2046	*-5,477*	*5,564*	*8,341*	*21,738~~8,428~~*
Remaining affordable target need 2025-2046 (with completes 2021-2024)	*-4,365*	*5,955*	*9,029*	19,546
Remaining affordable target need 2027-2046	*-1,268*	6,354	9,298	15,781
Housing Types that typically serve needs	Low Rise and Mid Rise (walk-ups up to 3 stories, apartments, and condos)	Moderate Intensity (townhomes, duplex, triplex, 4-plex) + ADUs	Low Intensity (single-unit)	

Notes: *HAPT – Housing for All Planning Tool
** Completes are based on the data available in the City of Spokane's June 2025 Report, Accommodating Affordable Housing. (City of Spokane, June 2025) As data is improved and evaluated, there may have been more housing completions than reported which show progress in meeting the City's housing target.
*** LCA – Land Capacity Analysis
****Completes are updated for the period January 1, 2020 to July 31, 2026.
Sources: SRTC, 2024, City of Spokane, 2025, BERK 2025.

Alternatives 2 and 3 and the Preferred Alternative ~~and 3~~ would allow for increased moderate to high intensity residential and mixed-use designations in corridors or centers that increase opportunities for low- and mid-rise housing, typically serving households with incomes at 0-80% AMI. Alternatives 2 and 3 and the Preferred Alternative would increase the multi-unit housing shares from 35% under Alternative 1 to 41% per **Chapter 2, Exhibit 2.2-6**. Alternative 3 would focus more density in the Center City and Division Corridor study areas as well as selected other corridors, while Alternative 2 would add density to more corridors throughout the city. The Preferred Alternative blends features of Alternatives 1, 2, and 3, with housing growth in major hubs including the Center City and mixed use

and housing growth along bus rapid transit lines and corridors that have frequent transit. See **Exhibit 3.5-30**.

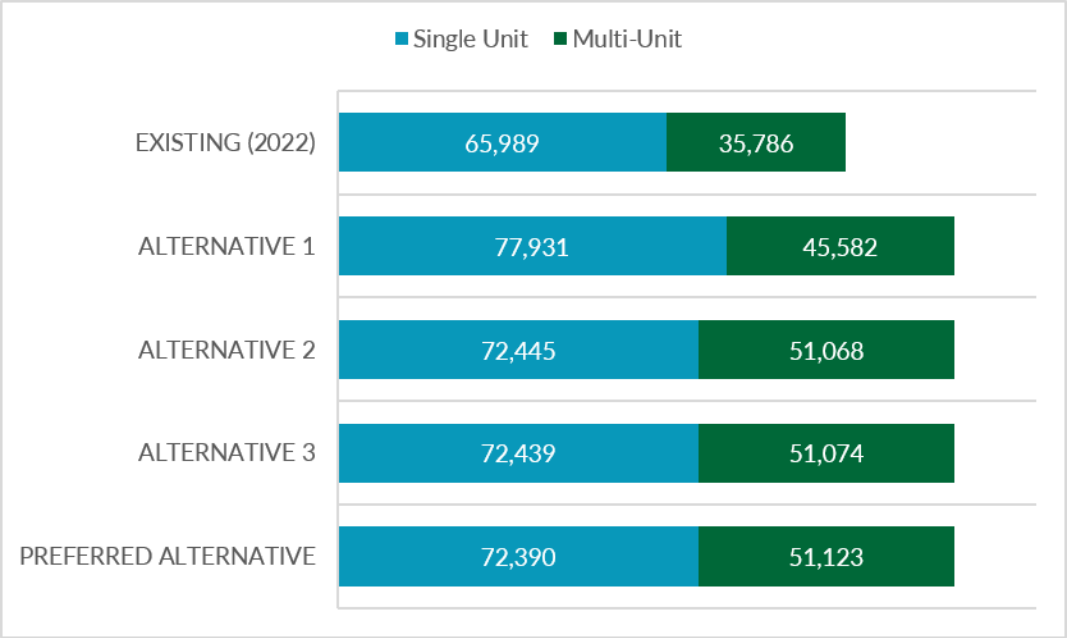
Exhibit 3.5-30. Housing Types by Alternative

Density Group	Alternative 1: Housing Types Allowed	Maximum Density Allowed	Assumed Density	Action Alternatives 2 And 3 and Preferred Alternative
Low Intensity Residential	Single-Unit and Middle Housing	10 (approximate)	5-9 du/ac	Alternatives 2 and 3 and the Preferred Alternative implement Middle Housing similar to Alternative 1
	Middle Housing	20 (approximate)		
Moderate Intensity Residential	Middle Housing and Multi-Unit	30 (approximate)	29 du/ac	Under Alternatives 2 and 3 and the Preferred Alternative along frequent transit corridors: Increased moderate and high intensity residential areas, supportive of Low- and Mid-Rise Housing
High Intensity Residential		No Limit		
Non-Residential, Excluding Industrial	Middle Housing and Multi-Unit	No Limit	30.2 du/ac in 33% of the development	Under Alternatives 2 and 3 and the Preferred Alternative along frequent transit corridors and Alternative 3 and the Preferred Alternative in the Center City: Increased Mixed-use areas, Supportive of Low and Mid Rise
Downtown	Middle Housing and Multi-Unit	No Limit	44.4 du/ac in 33% of the development	Under Alternative 3 and the Preferred Alternative in the Center City and selected corridors: Increased share of residential at higher densities

Sources: (City of Spokane, June 2025); BERK 2025~~5~~6.

Reflecting the housing targets and added low- and mid-rise housing, Alternatives 2 and 3 and the Preferred Alternative alter the share of growth that is multi-unit housing; however, in 2046 the majority of housing citywide would still be single-unit. See **Exhibit 3.5-31**.

Exhibit 3.5-31. Housing Mix 2022 and 2046 by Alternative



NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Source: SRTC, 2022; BERK, ~~2025~~2026.

Floor Area Ratios Along Bus Rapid Transit Lines

Under current zoning (Alternative 1) the City of Spokane already provides sufficient FARs along the City Line except along the eastern portion of the line where lower intensity is planned. See **Exhibit 3.5-15**.

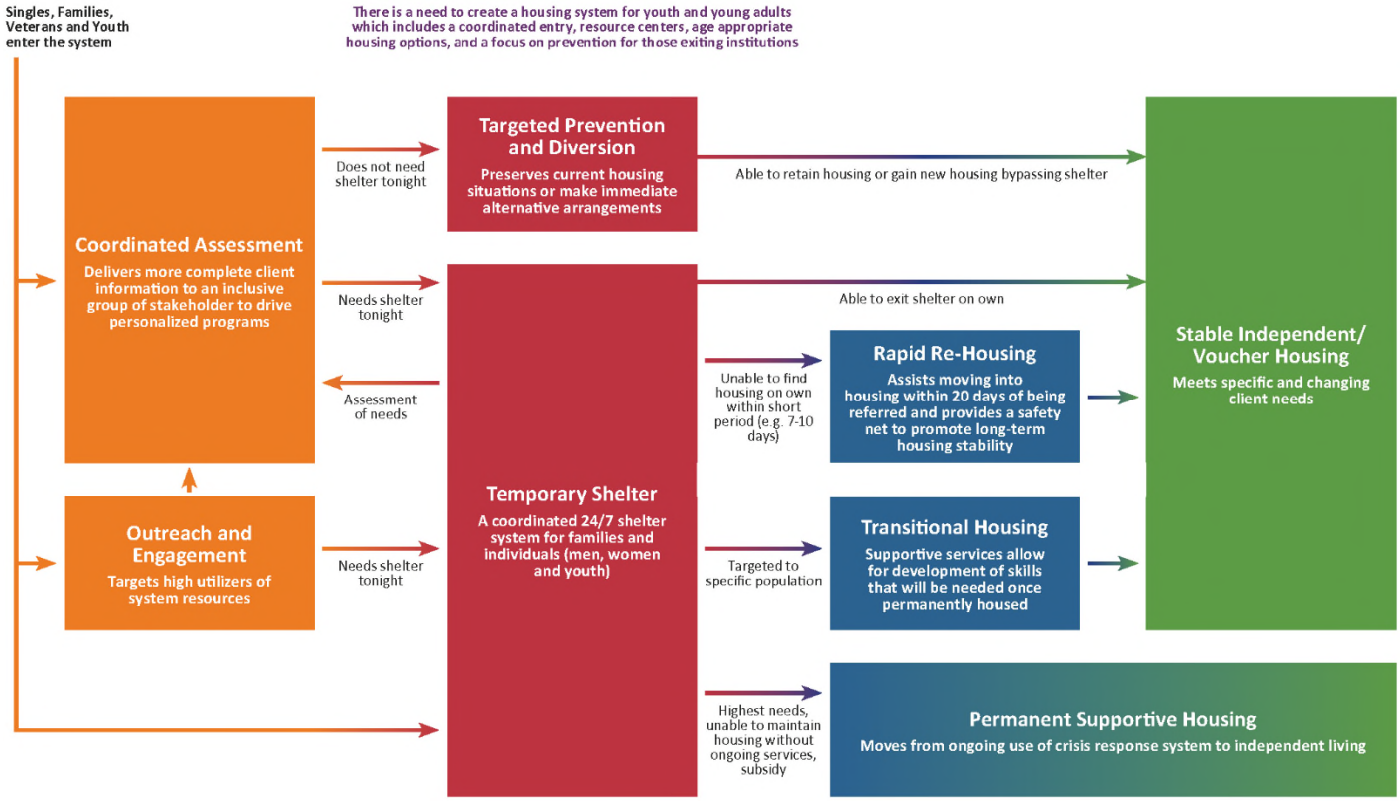
Alternatives 2 and 3 and the Preferred Alternative provide for added Mixed Uses/Commercial and High Density Residential along the City Line, and Alternative 3 and the Preferred Alternative provide ~~s~~ more extensive Mixed Uses/Commercial areas beyond the City Line corridor. Thus, the City would meet the FAR requirements with these alternatives. Additional code amendments would be needed under any studied alternative to address inclusionary affordable housing, multifamily tax exemption amendments, and mass timber incentives. The City may also request a portion of the area be exempt for five years in areas of high risk of displacement (e.g., East Mission Avenue east of river) subject to the Department of Commerce approval.

Permanent Supportive and Emergency Housing

The City's housing targets include a share of housing that is permanent supportive housing ("PSH") that would mean the addition of 1,851 PSH housing units between 2020 and 2046. The allocation of emergency housing is 983 beds. Under all alternatives, the City would continue programs and

regulations to address homelessness. It addresses temporary shelter, re-housing, transitional housing, and permanent supportive housing. See **Exhibit 3.5-32**.

Exhibit 3.5-32. City of Spokane – Compassion Spokane Approach to Homelessness



Source: (City of Spokane, Undated)

HB 1220 (2021) requires jurisdictions to update their development regulations with respect to emergency shelters, transitional housing, emergency housing, and permanent supportive housing (STEP). The current Spokane Municipal Code requirements for some STEP uses are sufficient to meet the requirements of HB 1220; thus, all alternatives would likely comply with this requirement. However, development of new housing in the most affordable bracket (either PSH or non-PSH) would not meet the requirements of HB 1220 due to the availability of land in more affordable locations. Conversely, the action alternatives provide capacity for housing at all income levels, update the Housing Element policies on emergency and permanent housing, and implement code amendments to address STEP housing.

Implementation of Housing Action Plan

The City has implemented many recommendations of the Housing Action Plan (HAP) under Alternative 1 Stay the Course, such as allowing for middle housing, creating a Target Investment Area (see **Exhibit 3.5-19**) and incentives, addressing short-term rentals, numerous updates to Accessory Dwelling Unit standards, and more. Action alternatives, including the Preferred Alternative, would advance more

HAP strategies to streamline permitting under the SEPA infill exemption and SEPA exemption thresholds, improve infrastructure in centers and corridors, target higher intensity development to where there is ready access to transit, and address other strategies to reduce racially disparate impacts consistent with new Housing Element requirements. See **Exhibit 3.5-33**.

Exhibit 3.5-33. Housing Action Plan Strategies Advanced under Alternatives

✓ Strategy Implemented ◆ Strategy Under consideration with EIS Alternatives

	Alt. 1	Alt. 2	Alt. 3	Preferred Alt.
A. Increase housing supply, options, and affordability for all incomes.				
A1. Explore and expand allowed housing types to encourage missing middle housing throughout Spokane's neighborhoods.	✓	✓	✓	✓
A2. Target efforts to increase the development of affordable housing throughout the city to support mixed-income neighborhoods.	✓	✓	✓	✓
A3. Continue to streamline and simplify changes to the City's permit process, as necessary.		◆	◆	◆
A4. Leverage infrastructure and investment, including near high-performance transit stops, in Centers and Corridors, the downtown core, and other targeted areas to increase housing supply.		◆	◆	◆
A5. Revise Accessory Dwelling Unit standards to allow for additional flexibility.	✓	✓	✓	✓
A6. Leverage public and partner-owned[5] land for housing, including a land bank. (not yet implemented)				
B. Preserve existing housing affordability and quality to help people thrive where they live.				

[5] The HAP described examples of partners as Spokane Public Schools and the Washington Department of Transportation.

	Alt. 1	Alt. 2	Alt. 3	Preferred Alt.
B1. Expand preventative and proactive code enforcement to help maintain safe and quality housing. (not yet implemented)				
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.	✓	✓	✓	✓
B3. Enhance protections and assistance for renters, particularly the most vulnerable.		◆	◆	◆
B4. Maintain and improve existing affordable rental housing.	✓	✓	✓	✓
B5. Study the local short-term rental market to reduce impact on housing affordability, neighborhood identity, and displacement.	✓	✓	✓	✓
C. Enhance equitable access to housing and homeownership.				
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.		◆	◆	◆
C2. Address racial inequities and disparities in housing.		◆	◆	◆
C3. Preserve and stabilize the viability of existing homeownership for low-income homeowners.		◆	◆	◆
D. Leverage and grow partnerships to support housing initiatives across the region.				
D1. Support growth management planning which best meet the Comprehensive Plan's goals and policies.	✓	✓	✓	✓
D2. Leverage partnerships within the health, education, parks, and transportation fields to support housing affordability, access to opportunity and quality of life.		◆	◆	◆
D3. Grow and expand use of both local and regional housing data and analysis.		◆	◆	◆

Note: The Preferred Alternative was added to this table with the Final EIS.
✓ Strategy Implemented
◆ Strategy Under consideration with EIS Alternatives and updated Housing Element per HB 1220 and other laws.

Equity and Disparate Impacts

This section addresses the distribution of housing, employment opportunities, and neighborhood amenities, and the potential that alternatives could adversely or positively affect overburdened communities and vulnerable populations. The thresholds include:

- Amount of new housing in areas with high displacement risk.
- Projected loss of homes due to demolition in high displacement risk areas.
- Amount of new housing in connected and accessible neighborhoods (transit, libraries, parks).
- Potential for job or business displacement for employment uses located within medium/high intensity residential or mixed-use designated areas.

Residential Displacement

A 2025 Pew study found that new housing production slows rent growth throughout a metropolitan region, but it takes the most pressure off of older, less-expensive housing (Seva Rodnyansky, 2025). While all alternatives assume the same amount of total new housing production, Alternatives 2 and 3 and the Preferred Alternative would provide a greater diversity of new housing compared to Alternative 1. These alternatives are expected to increase the supply of apartments and other rental housing options, with potential to have the greatest impact on moderating housing cost escalation among the city's existing rental housing stock. As a result, Alternatives 2 and 3 and the Preferred Alternative are expected to reduce economic displacement pressure for current and future low-income renter households, including vulnerable households in areas of highest displacement risk, when compared to Alternative 1.

While rising housing costs are currently the most significant contributor to displacement pressure in Spokane, there is also potential for physical displacement when older housing units are demolished to make way for new development. Between 2010 and 2024, an average of 76 housing units were lost to demolition each year in Spokane, and the loss of older homes is expected to continue under all alternatives.[6] In some cases, the demolished homes are relatively affordable compared to new market rate housing. And in some cases, the demolition of older homes can result in the physical displacement of lower-income renter households who resided in those older units.

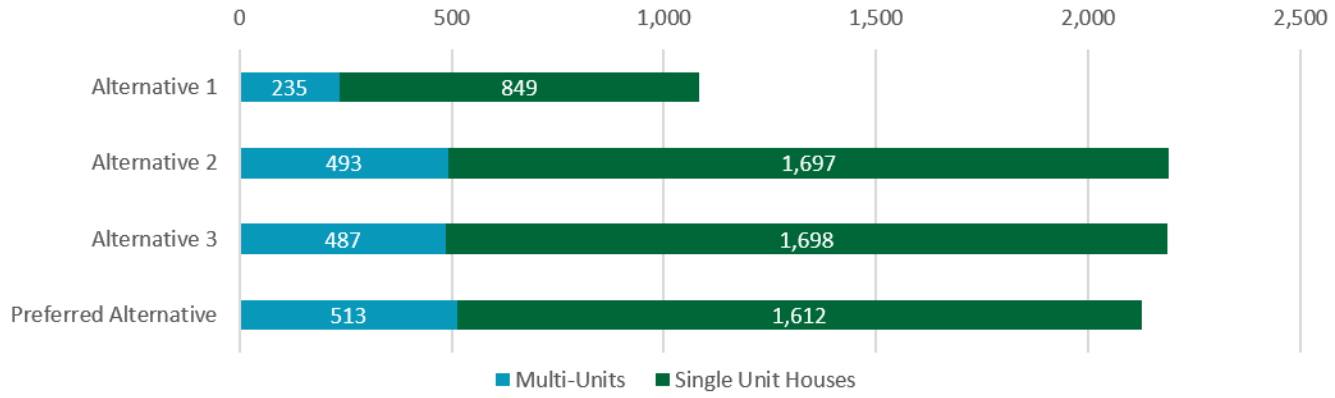
While it is impossible to predict whether a demolition will result in the displacement of a household, it is possible to estimate the types of homes that will be demolished and their approximate affordability

[6] Source: Washington State Office of Financial Management, 2025; BERK, 2025.

level.[7] **Exhibit 3.5-34** compares the alternatives with regards to projected demolitions by housing type. Alternative 1 focuses more of its total housing growth in areas of the city with vacant land where fewer existing housing units are expected to be demolished to make way for new development. Alternatives 2 and 3 and the Preferred Alternative, on the other hand, focus more growth in established areas of the city where more new construction will occur through redevelopment. As a result, Alternatives 2 and 3 and the Preferred Alternative are expected to demolish over twice as many housing units when compared to Alternative 1. In all alternatives, most of those units demolished are detached single unit houses where the previous residents could be homeowners or renters. A smaller number of demolished units are expected to be multifamily housing, which is much more likely to be occupied by renters.

[7] To estimate the number of existing housing units that could be demolished as a result of redevelopment, BERK utilized land capacity analysis data. Specifically, for each transportation analysis zone (TAZ) we calculated the total number of existing housing units on redevelopable parcels and divided this by the total capacity for new housing development. BERK then multiplied this "demolition ratio" by the projected housing growth in the TAZ to estimate the number of existing housing units that may be demolished during the planning period. This method is likely to produce a conservatively high estimate of demolitions given that new development is more likely to occur on vacant parcels or those with no existing homes (such as an empty parking lot or strip mall). Additionally, zoning changes associated with each action alternative would increase capacity in many TAZs, which would reduce the demolition ratio.
To estimate demolished units by housing type, BERK first calculated for each TAZ the percentage of existing units on redevelopable parcels that are single unit and the percentage that are in multi-unit buildings. We then applied these percentages to the total estimated demolished units in each TAZ to calculate demolished units by housing type.
To estimate the affordability level of each demolished unit, BERK leveraged prior City work that identified the typical affordability level of existing ownership and rental units by area of the city in Accommodating Affordability Housing in the City of Spokane, Washington, June 2025. For each TAZ, we applied the ownership affordability level to demolished single-unit homes and the rental affordability level to demolished multi-unit homes.

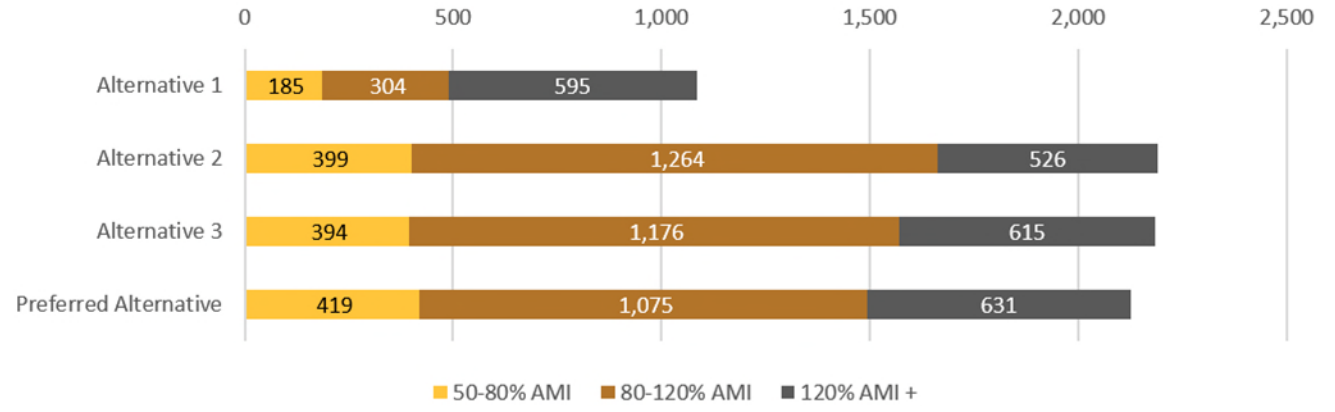
Exhibit 3.5-34. Projected Housing Units Demolished by Housing Type



NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Sources: City of Spokane, 2025; BERK 2025.

Exhibit 3.5-35 shows projected demolished units by affordability level. It is expected that most of these units would be affordable at the moderate (80-120% AMI) or high (120%+ AMI) income level. This is because demolished units are predominantly older single unit homes. Compared to Alternative 2, Alternative 3 is anticipated to have slightly fewer units demolished at 50-80% AMI and 80-120% AMI levels and slightly more at the 120%+ AMI level. Compared to Alternatives 2 and 3, the Preferred Alternative is anticipated to have slightly more units demolished at the 50-80% AMI range and 120%+ AMI range and fewer units demolished at the 80-120% AMI range.

Exhibit 3.5-35. Projected Housing Units Demolished by Affordability Level

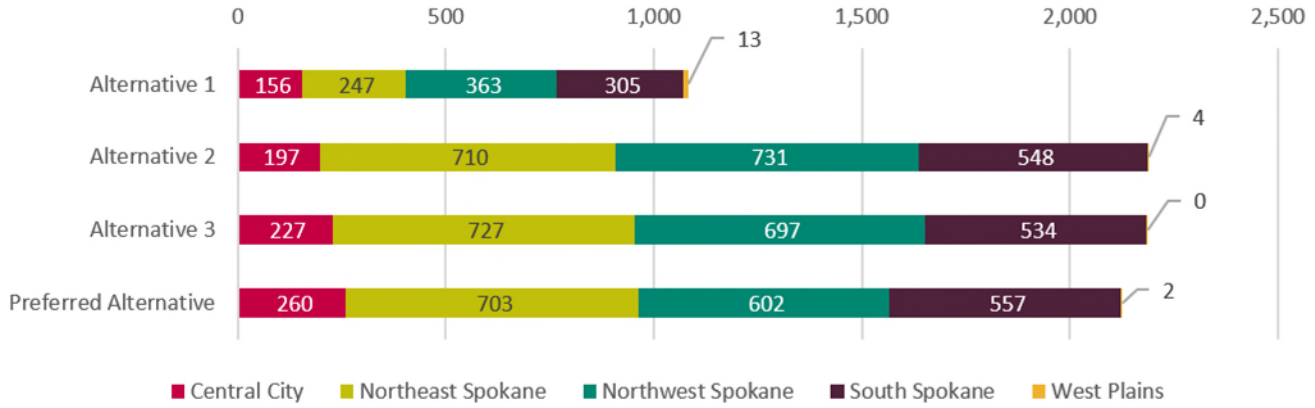


NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Sources: City of Spokane, 2025; BERK 2025.

Exhibit 3.5-36 shows projected demolished units by study area. There would be a similar number of demolished units in Northeast, Northwest, and South Spokane under Alternatives 2 and 3. There are

slightly more units demolished in Center City under Alternative 3 than Alternative 2. Compared to Alternatives 2 and 3, the Preferred Alternative would see slightly more units demolished in Central City and South Spokane, slightly fewer units in Northeast Spokane, and many fewer units in Northwest Spokane. Similar to the other alternatives, there would be a very small number of demolished units in West Plains.

Exhibit 3.5-36. Projected Housing Units Demolished by Study Area



NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Sources: City of Spokane, 2025; BERK 2025.

Exhibit 3.5-37 shows the expected units demolished by the area's displacement risk score. With more growth focused in already developed areas along corridors and centers such as Division, Center City, and others, there is more development expected in areas with high displacement risk under Alternatives 2 and 3 and the Preferred Alternative, compared to Alternative 1. This results in significantly more homes demolished in these areas. However, the flipside is also true. These neighborhoods would also receive more new housing production and greater diversity of housing options. Alternatives 2 and 3 and the Preferred Alternative will incorporate anti-displacement measures that mitigate displacement risk. This is expected to reduce economic displacement pressure compared to Alternative 1. See **Exhibit 3.5-38.**

Exhibit 3.5-37. Projected Units Demolished by Displacement Risk Score

Displacement Risk Score	Displacement Risk Level	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
1	Low	127	87	44	87
2		163	171	170	193
3	Medium	332	182	220	248
4		121	345	379	396
5	High	341	1,404	1,372	1,202
	Total	**1,084**	**2,190**	**2,185**	**2,125**

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Sources: City of Spokane, BERK 2025.

Exhibit 3.5-38. Potential to Reduce Economic Displacement Pressure

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

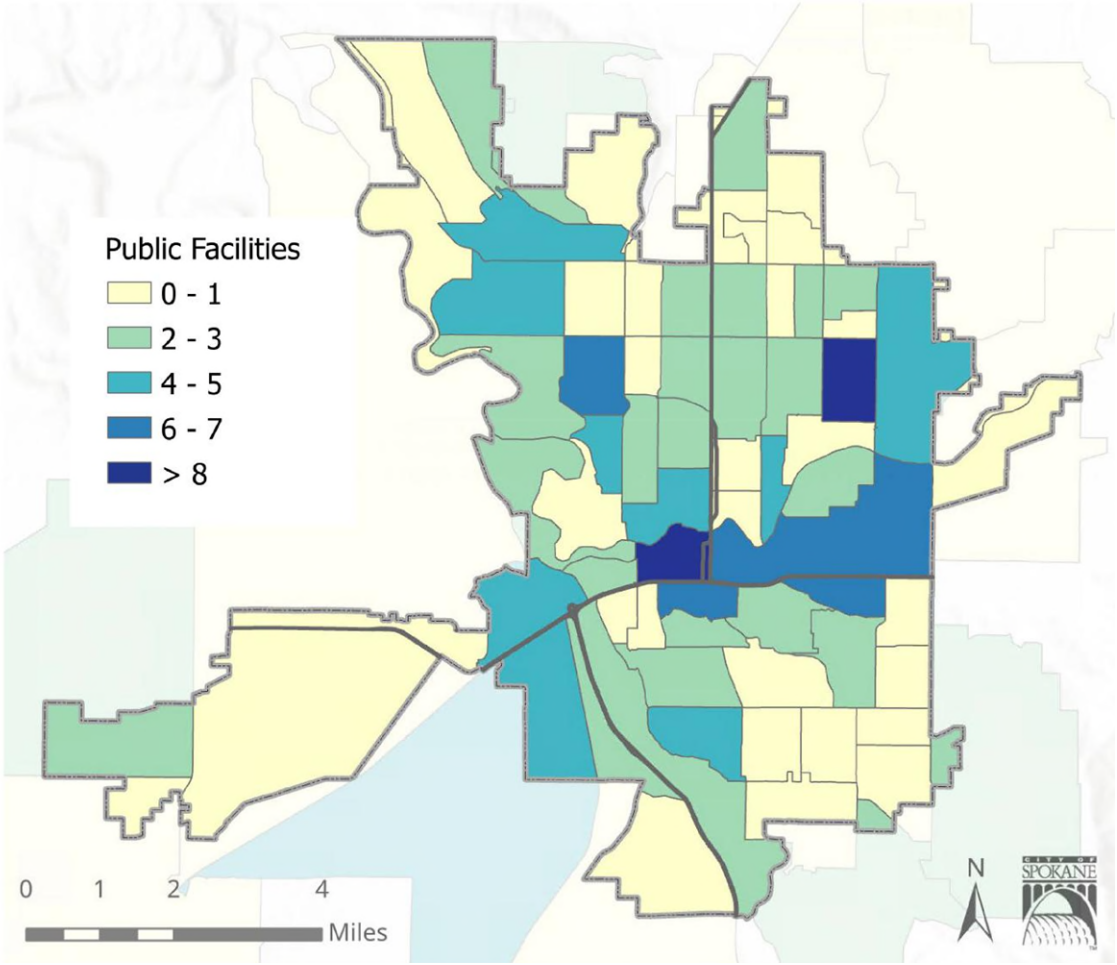
Legend: ○ = partially supports ●=supports ●+ = optimally supports
NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.

Housing in Connected and Accessible Neighborhoods (transit, libraries, parks)

Community Amenities

Community amenities such as schools, libraries, parks, and community centers provide important educational, social, and recreation resources that enhance livability. However, studies have shown that housing costs can rise faster in the vicinity of these amenities, such as next to new parks and parks in downtowns (Trust for Public Land, 2024). Housing and property values support school funding through property taxes and more funding for schools can support home appreciation (Savageau, 2023). Multiple amenities are near each other in the downtown, Liberty Park, the Northeast Community Center, and Shadle Park, including in several tracts considered to have higher displacement risk. See **Exhibit 3.5-39**.

Exhibit 3.5-39. Amenities by Census Tract: Schools, Libraries, Parks, and Community Centers



Source: (City of Spokane, 2025)

Transit and Home Values

A 2017 study of bus rapid transit (BRT) and home prices found that BRT routes positively impact surrounding single-unit home sale prices, with closer homes having higher sales prices than those located further from the route (Perk, 2017). A study of development along BRT and household socioeconomics in Vancouver, B.C. found "proximity to rapid transit infrastructure increases the attractiveness of nearby areas and results in a larger share of higher-income renters who can potentially price out lower-income households if the supply of affordable housing remains the same" (Kapatsila, 2024). The study notes examples of pairing transit-oriented development and affordable housing policies to increase affordable housing supply as part of transit system planning in the Puget Sound and Portland, Oregon.

A July 2025 study by the Urban Institute for Washington State regarding transit-oriented development (TOD) and transit found that, of the cities studied in Washington state, Spokane had limited transit and low housing costs, and average rents near Spokane's BRT stations are lower than those in the rest of

the city. Spokane was considered to be a community with "limited transit, low housing costs" along with Everett and Tacoma, as well as others. As a group, the study found:

- Attracting development, especially retail, is hard because of limited market demand.
- Rents are increasing more quickly than incomes, putting families at risk.
- Many people living near transit do not take advantage of the system.

In higher cost cities with more ample transit like Seattle, Bellevue, and Redmond, the study found some gentrification may be occurring near transit where households with higher incomes are choosing to move. Overall, the study indicates that "displacement of residents with low or moderate incomes may … be occurring near transit in some cities. But we caution that we have inadequate evidence to definitively prove whether displacement is occurring. It is possible that some families with low incomes may choose to pay more for housing in exchange for the reduced transportation costs made available thanks to transit investments." The report recommends developing higher housing densities and encouraging small businesses near transit routes, funding infrastructure grants to lower tax base municipalities along transit routes, reducing pollution exposure of highway-adjacent transit areas, and investing in affordable housing. It also recommends expanding the capacity of public entities, including transit agencies, to facilitate housing development (Urban Institute, 2025). It identifies the benefits of increasing densities near transit under HB 1491 and offers recommendations to further improve the law with infrastructure investment funds and minimum floor area ratios.

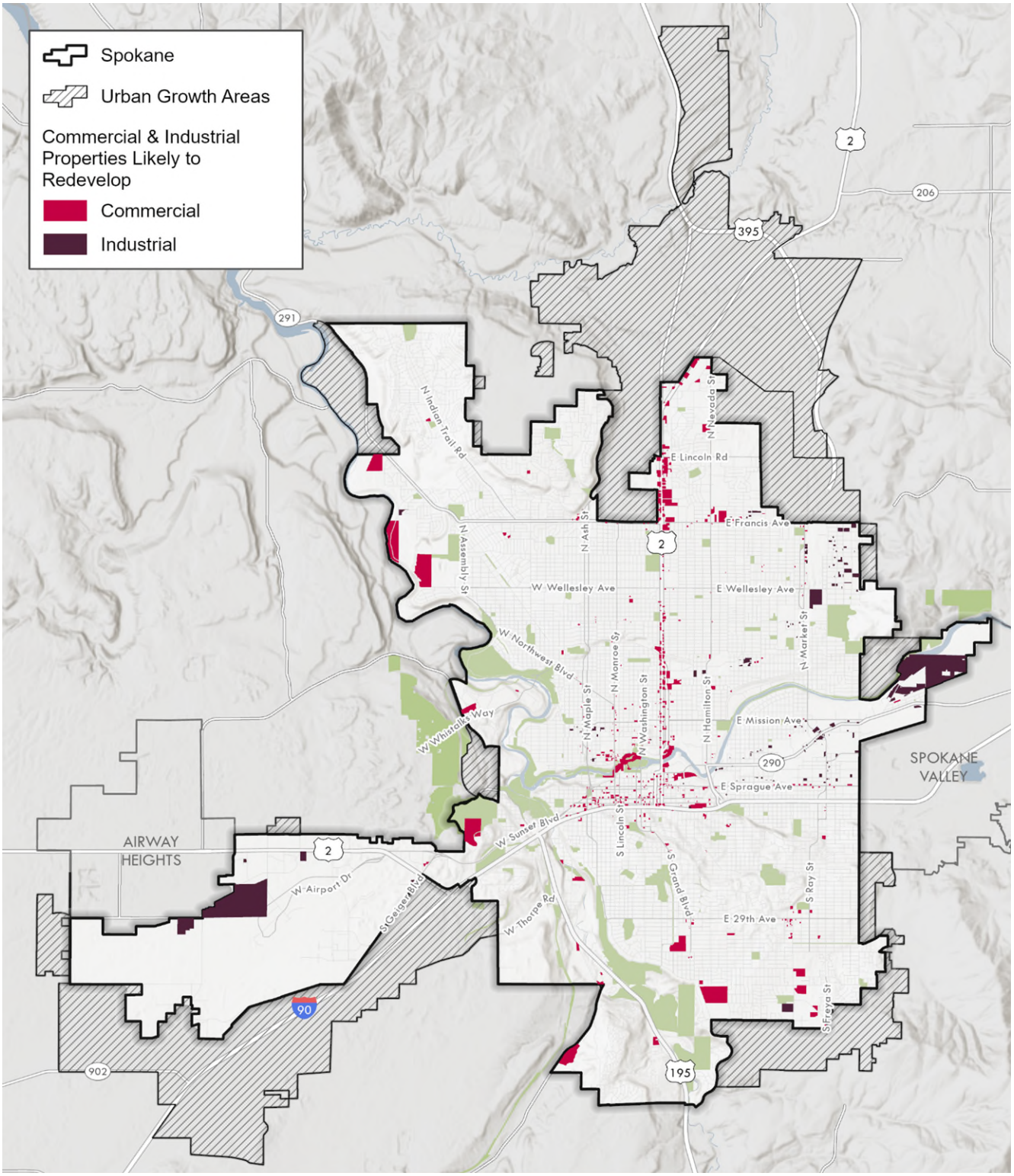
Commercial and Industrial Business Displacement

This evaluation considers the potential that commercial or industrial buildings and businesses could see investment or change where there are:

- Commercial and industrial buildings on "underutilized" parcels where parcel value is higher than building value.
- Commercial and industrial buildings built pre-1985.

The parcels with these characteristics are shown in **Exhibit 3.5-40.**

Exhibit 3.5-40. Commercial and Industrial Properties likely to Redevelop



Sources: Spokane County Assessor, BERK, 2025.

If the alternatives apply land use designations and implement zoning with limitations on employment, there could be displacement of existing buildings. If the alternatives increase allowances for mixed-uses or housing existing businesses may be displaced or unable to afford new space in mixed use developments due to rising costs; however, it is also possible that added residents in or near commercial areas can provide additional customers allowing businesses to successfully occupy new space.

In areas where the land use designations and implementing zones remain similar (such as industrial areas), these sites may be good candidates for further investments in commercial or industrial uses. Zoning in the Division Corridor is largely multi-unit and commercial under Alternative 1. The number of parcels that could be redeveloped is high and more intense residential density could lead to displacement under Alternatives 2 and 3 and the Preferred Alternative. Recent studies suggest that gentrification is not happening near transit; however, rents are increasing faster than incomes in the cities that, like Spokane, have less transit use and are lower cost cities (Urban Institute, 2025). See **Exhibit 3.5-41.**

The alternatives largely plan for industrial, both light and heavy, in similar locations as zoned under Alternative 1., ~~but m~~More intense employment is planned under Alternatives 2 and 3, ~~,~~particularly under Alternative 3. The Preferred Alternative plans for the same amount of employment as Alternative 1 and similar intensities. There are parcels with older industrial buildings that could see change such as the addition of new businesses but still remain industrial.

Exhibit 3.5-41. Employment Growth and Potential for Redevelopment and Displacement

Region	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
Northwest	In areas with redevelopable properties, there could be moderate growth on W Northwest Blvd, N Monroe Street and N Maple Streets. Moderate potential for displacement.	Distributed mixed-uses and commercial uses on corridors at a slightly lower level than Alternative 1. Lowest potential for displacement.	Greater growth along selected corridors particularly north-south corridors like N Monroe and to W Northwest Blvd. Greater potential for displacement.	Nodes of commercial/mixed use growth at key intersections including along N. Monroe St, W Northwest Blvd, W Wellesley Ave, and part of W Francis Ave. Moderate potential for displacement.

Region	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
Northeast	Moderate growth on corridors such as E Francis Avenue, E Fairview Avenue, E North Foothills Dr, and N Market Street. Moderate growth in Hillyard on redevelopable properties. Continued, expanded, or new industrial uses.	Higher growth on more corridors with existing businesses such as E Francis Avenue and portions of N Hamilton Street. Moderate growth in Hillyard on redevelopable properties. Continued, expanded, or new industrial uses.	Higher growth on selected corridors such as the E Mission Avenue corridor and portions of N Hamilton Street. Moderate-high job growth in Hillyard on redevelopable properties. Continued, expanded, or new industrial uses. Higher displacement due to North Spokane Corridor. Higher residential displacement risk could affect cultural institutions and local businesses.	Nodes of commercial/mixed use growth at key intersections including along E Francis Ave, E Wellesley Ave, N Nevada St, and N Market St. Moderate job growth in Hillyard on redevelopable properties. Continued, expanded, or new industrial uses. Higher displacement due to North Spokane Corridor. Higher residential displacement risk could affect cultural institutions and local businesses.
Division	Moderate growth with potential to change redevelopable properties along Division Street. Moderate potential for displacement.	Focused mixed-use growth at north and south ends of Division Street with modest job growth in between. Lesser potential for redevelopment or displacement.	Greater growth and wider extent along the corridor with greater potential for redevelopment or displacement.	Northern part of corridor provides mixed use along Division Street similar to Alternative 2. Greater area of redevelopment on southern portion of corridor similar to Alternative 3.

Region	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
Center City	Moderate growth in North Bank, Downtown Core, and Medical District, and lower growth in South Logan. Moderate potential for displacement.	Moderate growth in Medical district. Moderate potential for displacement. Planned growth in South Logan per new subarea plan.	Greater job growth in Downtown Core, North Bank, and Medical District. Greater potential for displacement. Planned growth in South Logan per new subarea plan.	Greater housing growth in Downtown Core, North Bank, and Medical District. Greater potential for displacement of action alternatives. Planned growth in South Logan per new subarea plan.
South	Higher growth in smaller nodes along corridors with S Grand, E 29th Avenue, and S Regal and S Freya Streets. Higher potential for displacement.	Moderate growth along corridors with S Grand, E 29th Avenue, S Regal, and S Freya Street. Moderate potential for displacement.	Less area identified for change than Alternative 2. Moderate-higher job, particularly along southern end of transit corridors. Moderate potential for displacement.	Similar growth to Alternative 2, with slightly more along E 29th Avenue, S Regal St, and S Freya St. Moderate potential for displacement.
West Plains	Moderate industrial growth in airport vicinity; much land in the area is vacant. Displacement is not anticipated though expansion and further investment is possible.	Moderate industrial growth, with more north of airport. Displacement is not anticipated as described under Alternative 1.	Moderate-higher industrial growth in airport vicinity throughout airport vicinity. Displacement is not anticipated as described under Alternative 1.	Moderate industrial growth in airport vicinity. Growth in same areas as Alternative 3. Displacement is not anticipated as described under Alternative 1.

NOTE: The Preferred Alternative was added to the exhibit above with the Final EIS.
Sources: SRTC, 2022, BERK 2025~~5~~6.

Employment

Employment types, employment levels, and proximity of housing and jobs are key topics for the Land Use, Housing, and Economic Development elements under the Periodic Update (see **text box**). The employment thresholds of significance examined include:

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

The City of Spokane is a job hub in the Inland Empire, and there are slightly more jobs in relation to housing units. A higher ratio of jobs to housing could increase commuting into the city unless there is an increase in housing at all affordability levels to accommodate commuters.

Balance of Jobs and Housing

Some communities may wish to seek a greater balance of jobs and housing for more complete neighborhoods where people can live and work in the same area. This proximity improves work-life balance, reduces greenhouse gas emissions, and improves overall quality of life. This may require stronger policies to support new businesses and appropriately zoned land. If the economic development strategy will attract more employers and new jobs, it should also consider housing for those new workers and their prospective incomes. (Washington State Department of Commerce, 2023)

Alternatives 1 and 3 and the Preferred Alternative increase the share of jobs relative to housing whereas Alternative 2 generally holds the current jobs/housing balance. See **Exhibit 3.5-42**.

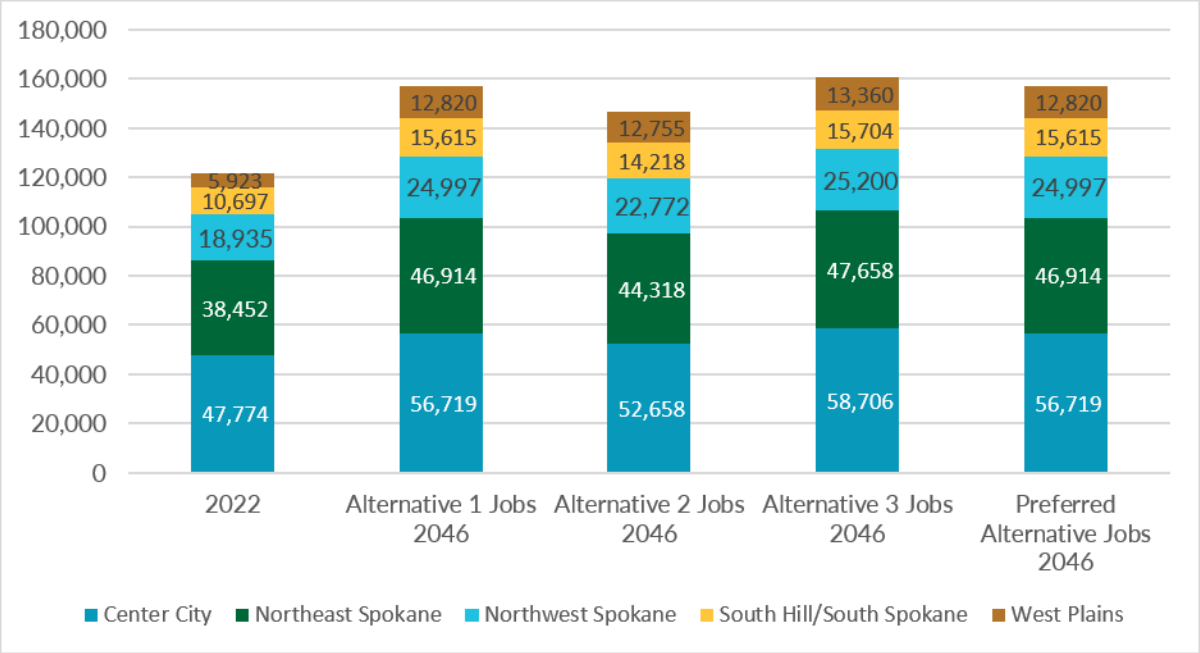
Exhibit 3.5-42. Jobs/Housing Balance

	2022		ALTERNATIVE 1 & PREFERRED ALTERNATIVE		ALTERNATIVE 2		ALTERNATIVE 3	
	Jobs	Housing	Jobs	Housing	Jobs	Housing	Jobs	Housing
Totals	121,781	101,774	157,065	123,512	146,720	123,512	160,629	123,512
Jobs/ Housing Ratio		1.20		1.27		1.19		1.30

Source: SRTC 2022, BERK 2025~~5~~6.

Under all alternatives, most jobs are in Northeast Spokane and Center City. West Plains will see a large change compared to present. ~~Job increases in~~There will also be job increases in Northwest Spokane ~~will be modest~~. See **Exhibit 3.5-43**.

Exhibit 3.5-43. Jobs in Study Areas by Alternative



NOTE: The exhibit above has been corrected with the Final EIS and the Preferred Alternative has been added. An error was identified in the study area boundaries used for the Draft EIS calculations for this chart.
Sources: SRTC 2022; BERK 2026.

Detailed job sector projections are not available for 2046 but based on historic trends and mid-period projections for 2034 by the Spokane Workforce Council shows continued growth in healthcare and other services. (Spokane Workforce Council, 2025)

Alternative 1: No Action, Stay the Course

Alternative 1 No Action, Stay the Course provides capacity for total housing targets and partially meets the housing targets by affordability for those with incomes at 80-120% and above AMI. Alternative 1 incorporates housing policy and code changes made as a result of the HAP such as middle housing and targeted investment areas, but it does not update the housing element and would not make additional changes to undo racially disparate impacts and address displacement from past decades of planning that prioritized single unit zoning and less investment in formerly redlined areas, and it would not add code amendments to streamline permitting as recommended in the Housing Action Plan (City of Spokane, 2021). Alternative 1, however, would meet population targets.

Alternative 1 would have a lower share of multi-unit housing forms than ~~alternatives~~ Alternatives 2 and 3 and the Preferred Alternative. It does not include the new housing and jobs anticipated in the South Logan Subarea Plan.

Alternative 1, like the Preferred Alternative, provides mid-range jobs and focuses the jobs in center and corridors. It does not update economic development element policies and would not address

additional commercial displacement strategies. It would increase the jobs-housing ratio which assumes a higher rate of jobs than historically achieved. (See **Section 3.7 Transportation**.)

Alternative 1 provides more housing on vacant land and would have less physical displacement impacts than Alternatives 2 and 3 and the Preferred Alternative but it would not increase capacity for housing most likely to be affordable to lower income households and it would have a greater potential for adverse impacts in terms of economic displacement pressure.

Alternative 1 does not propose changes to land use designations or development standards around the City Line BRT stations. It would not meet the provisions of HB 1491 for a 3.0 FAR in each BRT station area in the Chief Garry Park vicinity. It would not provide additional anti-displacement measures in the Comprehensive Plan.

Alternative 2: Distributed and Balanced

Alternative 2 Distributed and Balanced provides capacity for total housing targets and fully meets the housing targets by affordability for all incomes by providing more mixed-use and residential medium and high intensities designed to support low- and mid-rise development that is more affordable. There would be a higher share of multi-unit housing compared to Alternative 1. Alternative 2 would include the new housing and jobs anticipated in the South Logan Subarea Plan.

Alternative 2 has the potential to displace existing housing particularly single-unit detached homes and some multi-unit homes (see Impacts Common to All Alternatives) but there is a greater capacity for housing supply that should reduce the pressure of economic displacement. Compared to Alternative 3, Alternative 2 is anticipated to have slightly more units demolished at 50-80% AMI and 80-120% AMI levels and slightly less at the 120%+ AMI level. Compared to the Preferred Alternative, Alternative 2 would have slightly fewer units demolished at 50-80% AMI, more units demolished at 80-120% AMI, and fewer units demolished at 120% AMI. Alternative 2 would also establish anti-displacement housing policies. See Mitigation Measures particularly **Exhibit 3.5-45**~~Exhibit 3.5-44~~. With most units demolished likely being single-unit, either owner or rental, anti-displacement programs addressing ownership housing or housing choice may be appropriate. Anti-displacement measures that promote low-rise and mid-rise housing along frequent transit routes would assist in providing housing that is more affordable, such as increasing allowable building heights along transit corridors.

Alternative 2 fully updates the housing element. Racially disparate impacts are addressed by allowing for more forms of ownership housing (e.g., co-housing) and multi-unit developments in single unit dominated areas, as well as where there is more investment in transit. In support of the Housing Action Plan, Alternative 2 adds code amendments to streamline permitting through an infill exemption and raising SEPA thresholds (City of Spokane, 2021). Alternative 2 would meet population targets.

Alternative 2 increases jobs along corridors and adds mixed-use zoning in more locations, and has the potential to displace existing businesses along more corridors than Alternative 3 and the Preferred Alternative, but measures to reduce business displacement could be implemented per **Exhibit 3.5-45**~~Exhibit 3.5-44~~. Its balance of jobs and housing is similar to the ratio found today. It has fewer total jobs than Alternatives 1 and 3 and the Preferred Alternative. (See **Section 3.7 Transportation**)

Alternative 2 updates economic development element policies and addresses additional commercial displacement strategies.

Alternative 2 proposes Mixed Use Commercial and High-Density Housing along the Center Line in the Chief Garry Park Vicinity. This could result in implementing zoning addressing the FAR requirements of HB 1491. Alternative 2 also proposes anti-displacement policies which would be important in the context of housing intensification along the TOD route.

Alternative 3: Center City and Regional Hubs

Alternative 3 meets all housing targets at all affordability levels like Alternative 2 and the Preferred Alternative. It increases the share of multi-unit housing in low- and mid-rise formats to help close the gap in housing affordable to those with incomes of 0-80% AMI. As with Alternative 2 and the Preferred Alternative, there would be a higher share of multi-unit housing compared to Alternative 1. Alternative 3 would include the new housing and jobs anticipated in the South Logan Subarea Plan.

The housing intensities would be highest in Center City and selected corridors like Division and where there is frequent transit, such as along Routes 4 and 23 that extend from the Northwest to the South. Compared to Alternative 2, Alternative 3 is anticipated to have a ~~slightly fewer units~~similar number of units demolished at 50-80% AMI ~~an~~, fewer units at ~~d~~ 80-120% AMI, ~~levels~~ and slightly more at the 120%+ AMI level. Compared to the Preferred Alternative, Alternative 3 would have slightly fewer units demolished at 50-80% AMI and 120%+ AMI and more units demolished at 80-120% AMI. There is a potential for displacement of existing housing (see Impacts Common to All Alternatives) but there is a greater capacity for housing supply that should reduce the pressure of economic displacement. Like Alternative 2 and the Preferred Alternative, ~~,~~ most units that could potentially be demolished are single-unit, owner or rental, and programs that address both needs are important as shown in **Exhibit 3.5-45**~~Exhibit 3.5-44~~. See Mitigation Measures below.

Similar to Alternative 2 and the Preferred Alternative, Alternative 3 would also ~~-~~update the housing element and institute some actions to streamline permits as recommended in the HAP.

Alternative 3 provides the highest number of new jobs and would increase the jobs/housing ratio. It would boost jobs in the larger job hubs in Center City such as in the Medical District and University District as well as the Downtown Core. (See **Section 3.7 Transportation.**) It has the potential to displace some existing commercial jobs on corridors, but fewer corridors would be affected, and existing job hubs would be a focus of new jobs, compared to Alternative 2 and the Preferred Alternative.

Like Alternative 2 and the Preferred Alternative, this alternative ~~addressing~~ addresses Center City and Regional Hubs updates to economic development element policies, together with additional commercial displacement strategies.

Similar to Alternative 2 and the Preferred Alternative, Alternative 3 proposes Mixed Use Commercial and High-Density Housing along the Center Line in the Chief Garry Park ~~V~~vicinity, which should

support consistency with requirements of HB 1491. Likewise, anti-displacement policies which would be important in the context of housing intensification along the TOD route.

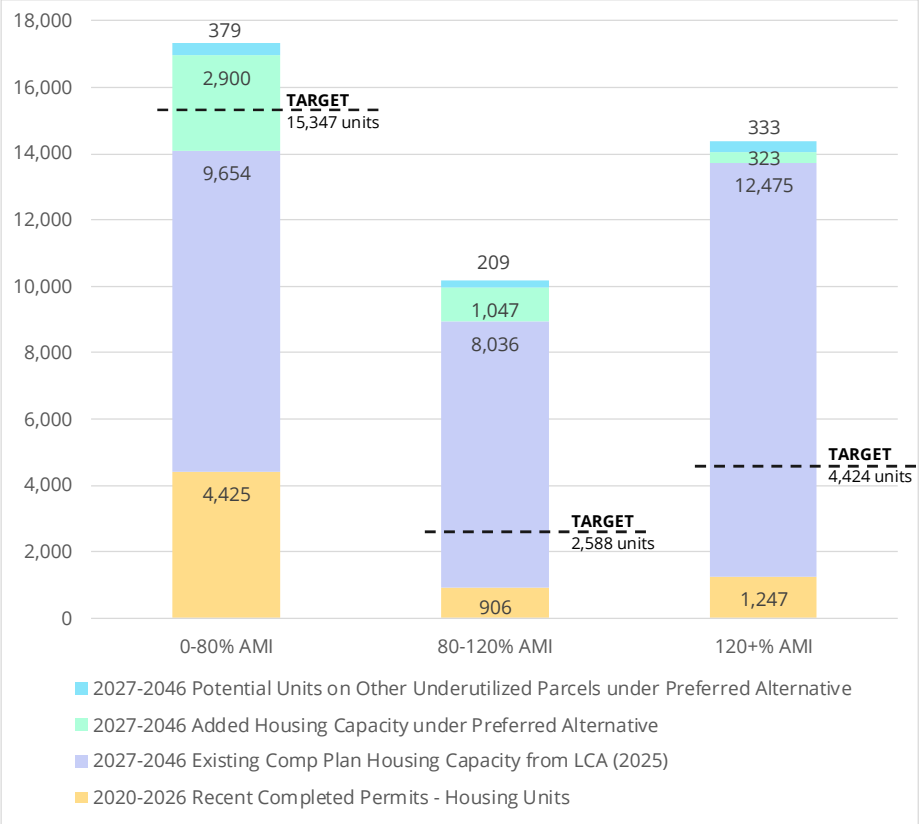
Preferred Alternative

NOTE: *Analysis for the Preferred Alternative was added below with the Final EIS.*

The Preferred Alternative meets all housing targets at all affordability levels like Alternatives 2 and 3. It increases the share of multi-unit housing in low- and mid-rise formats to help close the gap in housing affordable to those with incomes of 0-80% AMI. As with Alternatives 2 and 3, there would be a higher share of multi-unit housing compared to Alternative 1. The Preferred Alternative would include the new housing and jobs anticipated in the South Logan Subarea Plan.

The housing intensities would be highest in Center City and around key nodes on selected corridors like Division and where there is frequent transit, such as along Routes 4 and 23 that extend from the Northwest to the South. Compared to Alternatives 2 and 3, the Preferred Alternative is anticipated to have slightly more units demolished at 50-80% AMI and 120%+ AMI levels and fewer at the 80-120% AMI level. There is a potential for displacement of existing housing (see Impacts Common to All Alternatives) but there is a greater capacity for housing supply that should reduce the pressure of economic displacement. The capacity of the Preferred FLUM would close the gap in the 0-80% AMI target need as described in **Chapter 2, Section 2.4** and in **Exhibit 3.5-44**.

Exhibit 3.5-44. 2020-46 Housing Allocations & Capacity by Income Band – Preferred Alternative



NOTE: The exhibit above was added with the Final EIS. | Source: BERK, 2026; City of Spokane, 2026.

Like Alternatives 2 and 3, most units that could potentially be demolished are single-unit, owner or rental, and programs that address both needs are important as shown in **Exhibit 3.5-45**~~Exhibit 3.5-44~~. See Mitigation Measures below.

Similar to Alternatives 2 and 3, the Preferred Alternative would also update the housing element and institute some actions to streamline permits as recommended in the HAP.

The Preferred Alternative provides the same number of new jobs as Alternative 1, which is in between the number of jobs assumed under Alternatives 2 and 3. The Preferred Alternative would increase the jobs/housing ratio. It would boost jobs in the larger job hubs in Center City such as in the Medical District and University District as well as the Downtown Core. (See **Section 3.7 Transportation.**) It has the potential to displace some existing commercial jobs in key nodes along corridors, but fewer corridors would be affected than under Alternative 2, and existing job hubs would be a focus of new jobs.

Like Alternatives 2 and 3, this alternative addresses Center City and Regional Hubs updates to economic development element policies, together with additional commercial displacement strategies.

Similar to Alternatives 2 and 3, the Preferred Alternative proposes Mixed Use Commercial and High-Density Housing along the Center Line in the Chief Garry Park vicinity, which should support consistency with requirements of HB 1491. Likewise, anti-displacement policies which would be important in the context of housing intensification along the TOD route.

Maximum Development Scenarios

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

Capacity for Housing: The City's housing target is a 20-year projected level of housing growth based on OFM's population forecasts, which for Spokane is the medium or most likely forecast. Per GMA, the City's land use plan and implementing zoning and development regulations must allow for sufficient housing capacity for all income levels. Land capacity is based on the development types and densities allowed by zoning and development regulations, with assumed densities established in the land use element of the Comprehensive Plan.

The No Action Alternative and Preferred Alternative have capacity for housing growth above the total housing target (21,738, for the period 2022-2046). The No Action Alternative would have housing capacity of 39% (30,165) above the target. The Preferred Alternative would have capacity for housing at 63% (35,355) above the target. The Preferred Alternative provides more capacity for housing that would meet the housing targets for each economic segment whereas the No Action Alternative would not provide adequate capacity at the lower income levels, as described in **Chapter 2**. The Preferred Alternative accomplishes this by modifying the Future Land Use Map within areas of change identified in **Chapter 2 Exhibit 2.4-20**.

Population: The City's population growth target is 23,357 for the period of 2023 and 2046, or 25,157 adjusted to 2022 to 2046. This EIS studied a population range of 25,157 to 50,650 for a conservative analysis with the lower end based on a share of OFM's medium or most likely population projection, and the higher end being based on a larger household size like the current average size. Under the No

Action Alternative, there is a population capacity of 63,301 persons. With the Preferred Alternative, there could be an increase in population of 9,177, which is 14% higher than the No Action Alternative. Under either the No Action Alternative and Preferred Alternative there is more than sufficient capacity for population targets.

Housing Variety and Affordability: The Preferred Alternative would provide more capacity and diversity of housing than the No Action Alternative whether growing to the target level or the land capacity level. It would increase the ability of the City to provide multi-unit housing at low-rise densities that could meet housing targets for all income bands. The growth would be focused in areas served by frequent transit.

Equity & Disparate Impacts: If growth occurs at maximum potential development based on total land capacity rather than the housing target there could be more housing displaced under both the No Action Alternative and Preferred Alternative. At maximum potential development, the Preferred Alternative increases could result in greater risk of displacement than the No Action Alternative; however, the Preferred Alternative would implement new anti-displacement policies to mitigate impacts. It would also increase the amount of new housing in connected and accessible neighborhoods, particularly frequent transit.

3.5.3 Mitigation Measures

Incorporated Plan Features

PlanSpokane 2046 includes an updated housing element that addresses housing growth targets at all income levels. It also includes an evaluation of racially disparate impacts and displacement and makes adequate provisions to remove barriers to housing.

The City is updating its Economic Development Element to address the 2026-2046 period.

Regulations and Commitments

The City of Spokane's 2021 Housing Action Plan provides short, medium, and long-term strategies to address the community's housing needs. A number of strategies have been implemented as described in **Exhibit 3.5-33**.

StartUp Spokane is a program of Greater Spokane Inc., which in partnership with the Spokane Public Library and Spokane County Library provides business resources for entrepreneurs.

The Small Business Administration Strategic Alliance Memorandum was signed by the U.S. Small Business Administration, City of Spokane, and the AHANA Multi-Ethnic Business Association in September 2022. It establishes a heightened level of commitment to work together to bring services to underserved populations of entrepreneurs.

The Growth Management Act at RCW 36.70a.130(9) requires counties and cities like the City of Spokane to track housing units and progress in implementing its housing policies and strategies. Through this effort, the City can adaptively manage its housing policies, codes, and strategies.

Other Potential Mitigation Measures

Residential Anti-Displacement Strategies

The City's Housing Action Plan (City of Spokane, 2021) identifies potential displacement risk and evaluates potential strategies. It recommends additional research and ongoing monitoring of displacement factors. The City is developing its suite of policies in the updated housing element based on the City's RDI evaluation. See **Exhibit 3.5-45**~~Exhibit 3.5-44~~.

Exhibit 3.5-45. Summary Matrix of Housing and Business Anti-Displacement Measures

Measure	Details	Target
Community Engagement	Engage early and often with neighborhood stakeholders to ensure all voices are heard.	Community
Rental Assistance Fund	A Rental Assistance Fund is a relatively low-cost way to minimize the impacts of displacement on the most economically vulnerable populations. The Fund could be capitalized through development-related fees or through government or grant subsidy. The Fund would be available to those residents needing relocation cost assistance or to cover security deposit requirements or moving expenses.	Community
Tenant Protections	Support residential anti-displacement strategies for tenants, including relocation assistance, rent stabilization, and 'right to return' policies that give highest preference for housing support due to displacement from new development	Community, Residential
Community Preference Program	Consider a "community preference" policy which establishes preference for existing residents of the community in applications for affordable housing units to allow for disadvantaged residents of high displacement areas to access priority to new affordable housing units which could directly address displacement.	Community, Residential

Measure	Details	Target
Right-to Purchase Programs	Provides tenants and cities with the right to purchase government-assisted multifamily rental properties and mobile home parks when the owner decides to sell a property or exit an affordable housing program. This right is typically provided to qualified nonprofit organizations with the intent to keep current tenants housed and to prevent disruption of residence.	Community, Residential
Community Land Trusts	Land acquired by public agencies, nonprofits, or community-based organizations that maintain permanent ownership of land. Prospective homeowners are able to enter long-term (i.e., 99-year), renewable leases at an affordable rate. Upon selling, homeowners only earn a portion of the increased property value, while the trust keeps the remainder, thereby preserving affordability for future low- to moderate-income families.	Community, Residential
Housing Rehabilitation	Promote City programs that support affordable homeownership, including single-unit rehabilitation programs and essential home repair programs to help low- and moderate-income homeowners with home maintenance for health and safety.	Residential
Land Bank	Land banks can used in service of other forms of public benefit, which might include in the creation of affordable housing and the development of properties which offer below-market commercial space, both of which contribute directly to anti-displacement goals.	Residential
Use of Development Agreements	A development agreement is a contract between a city and a property owner which summarizes responsibilities associated with redevelopment of land. Development agreements are highly customized and specific to a particular site to maximize public and private benefits. Development agreements can be a useful tool to document an agreement between the City and the property owner to guide development towards certain policy goals, including the creation of housing.	Residential

Measure	Details	Target
Minimum Density Requirements	Setting a right-sized minimum density to be structured as an incentive rather than as a requirement. If the density requirement is set at too high a level, development could be discouraged in the near- and medium-term, a counterproductive and unintended consequence. If the requirement is too low, opportunities to add density in strategic locations could be less than capacity.	Residential
Credit support for small-scale developers	Lack of sufficient financial capacity is typically the primary barrier to financing of small projects and stands in the way of a citizen-developer corps who can do the hard but valuable work of locally-led, tactical, small-scale development.	Residential
Subsidy for less common ownership models	Land trusts, limited-equity cooperatives, and co-housing are relatively rare in the United States, but can be powerful models for long-term affordability and anti-displacement protection.	Residential
Middle Housing	Continue to remove barriers to the development of middle housing, which can provide for greater housing choice and affordability.	Residential
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

Measure	Details	Target
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 tax credits and grants for multi-unit housing where the building would retain that housing after preservation.	Residential
Public Development Authority ("PDA")	PDAs play a critical role in addressing displacement pressures arising from rising housing costs and gentrification in urban environments. These authorities can implement a range of strategies to promote equitable development and prevent the displacement of vulnerable residents and businesses. Consider structuring PDAs to respond to community needs, like the example of Cultural Space Agency (CSA) in Seattle, which is a Public Development Authority that secures long-term affordable cultural space with community partners. Cultural spaces forestall cultural displacement by giving community members a place to assemble, organize, celebrate, and create a sense of connection. CSA partners with communities of color to create opportunities for ownership of commercial cultural space.	Commercial, Residential
Reduce or Eliminate Minimum Parking Requirements	Reduce or eliminate parking requirements, in exchange for a contribution in lieu which furthers the public benefit.	Residential, Commercial
Building Heights	Support increasing allowable building heights along transit corridors. Consider pairing with neighborhood Design Standards, especially in critical, high visibility areas.	Residential, Commercial
Commercial Anti-Displacement	Create and implement commercial anti-displacement strategies to keep and give preference to local, historic, and unique businesses in redevelopment	Commercial

Measure	Details	Target
Flexibility for Ground Floor Retail Requirement	Flexible ground floor standards that permit but do not require retail, or require a smaller portion of the ground floor (e.g., corner space of buildings at intersections), would allow opportunities for retail to flourish in the right locations without also creating an impediment to new housing construction. Certain ground floor design or construction standards such as minimum floor heights can be employed to ensure flexibility to convert residential or "flex" space to convert to retail over time should demand for retail space increase in a particular location.	Commercial
Tax Increment Financing ("TIF")	Tax Increment Financing (TIF) can be used for the "purchasing, rehabilitating, retrofitting for energy efficiency, and constructing housing for the purpose of creating or preserving long-term affordable housing," RCW.39.114. The City currently only has one such TIF operating, with other opportunities possible.	Commercial
Facilitate Public-Private Partnerships	Partner with institutional partners, like universities, to support business and economic development in strategic areas.	Commercial
Business Improvement District ("BID")	BID could have as a guiding philosophy the support of new and preservation of existing local businesses, along with provision of funding programs, advisory services, and political advocacy.	Commercial
Affordable Commercial Tenanting	Provides public subsidy of commercial rents for qualified tenants in new construction. In Portland, OR, the City's Affordable Commercial Tenanting Program addresses the displacement of small businesses from Portland's urban neighborhoods. The program provides incentives to property owners in exchange for below-market rents for commercial tenants. Tenants must satisfy certain conditions including revenue thresholds, cultural contributions to the neighborhood.	Commercial
Small Developer Technical Assistance	Small loans ($20,000-$50,000) coupled with technical assistance to help local land owners and entrepreneurs build new development or renovate existing structures. Program features low-barrier underwriting, and very low or no interest.	Commercial

Measure	Details	Target
Storefront Improvement Program	Grants (typically <$50,000) for small-scale revitalization projects such as rehabilitation of street-facing building facades including storefronts, cornices, gutters and downspouts, signs and graphics, exterior lighting, canopies and awnings, painting and masonry cleaning, and limited security and accessibility improvements.	Commercial
Small Business Alliance	Develop a business association focused on small or home- based businesses. Ensure this group is narrowly focused on issues impacting the neighborhood. Should be facilitated by City staff who can also provide technical assistance.	Commercial
Local Vendor Collective	Resources to support home-based and other businesses without brick-and-mortar space. In Vancouver, BC, the vendor's collective offers vending opportunities to low-income artists, craftspeople, and entrepreneurs with experience in the informal economy. Resources could include booths and/or table space, publicity and event organization, dedicated space for vending activities.	Commercial

Source: (City of Spokane, 2025)

3.5.4 Significant Unavoidable Adverse Impacts

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

3.6 Relationship to Plans, Policies, and Regulations

The City of Spokane's last periodic update of the Comprehensive Plan was approved in 2017, with amendments last approved in 2023. This Comprehensive Plan Update is the next major periodic review to evaluate the Comprehensive Plan for consistency with the latest provisions of the State of Washington Growth Management Act (GMA), Countywide Planning Policies (CPPs), regional plans, and the community's vision. This section reviews adopted state, regional, and city plans and policies that guide growth in Spokane and evaluates the proposed alternatives for consistency. An impact is identified if the proposal would result in an inconsistency with adopted plans and policies. Mitigation measures to address identified adverse impacts and a summary of any significant unavoidable adverse impacts follow the description of existing conditions (affected environment) and impacts analysis.

Thresholds of significance utilized in this impact analysis include:

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

Per WAC 365-196-210, consistency means: *no feature of a plan or regulation is incompatible with any other feature of a plan or regulation. Consistency is indicative of a capacity for orderly integration or operation with other elements in a system*.

3.6.1 Affected Environment

The current policy and regulatory framework regulating land use in Spokane flows from the GMA, Spokane County CPPs, the City's current Comprehensive Plan, as well as implementation actions including development standards in the Spokane Municipal Code (SMC) and the Shoreline Master Program (SMP), which is not due for an update until 2030. Several other regulatory measures affect land use including regional strategic reports, localized subareas, overlay districts, adopted neighborhood plans, and design guidelines.

State and Regional Framework

Growth Management Act

Comprehensive Plans and development regulations within the City of Spokane must be consistent with the provisions of the Growth Management Act (GMA). Adopted in 1990, the GMA addresses concerns about the impacts of uncoordinated growth on Washington communities and the environment, and it provides a framework for land use planning and development regulations in the state. The GMA directs coordinated regional and countywide planning, which then informs the locally

adopted comprehensive plans and development regulations of individual cities and counties. Key provisions of the GMA include:

- Planning Goals
- Land Designations
- Buildable Lands Program
- Countywide Planning Policies (CPPs)
- Local Comprehensive Planning

The GMA is primarily codified under Chapter 36.70A RCW. The Washington State Department of Commerce (Commerce) has published a series of amendments to the GMA from 1995 through 2025. In 2021, GMA goals and element requirements regarding housing were amended to require jurisdictions to plan for and accommodate housing that is affordable to all economic segments of the population and to identify and address racially disparate impacts in the housing element. (See Section **3.5 Population, Employment, and Housing**).

The GMA includes 15 planning goals, in no particular order, to help guide the development and adoption of local comprehensive plans and development regulations. GMA Goal 15 references goals and policies of the Shoreline Management Act. These goals direct most population and employment growth to be focused in urban areas to avoid sprawl, provide efficient and effective services and infrastructure within adopted levels of service, and protect environmentally critical areas. See **Exhibit 3.6-1**.

Exhibit 3.6-1 GMA Goals

GMA Goal	Text
(1) Urban Growth	Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.
(2) Reduce Sprawl	Reduce the inappropriate conversion of undeveloped land into sprawling, low density development.
(3) Transportation	Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled and are based on regional priorities and coordinated with county and city comprehensive plans.
(4) Housing	Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.
(5) Economic Development	Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of

GMA Goal	Text
	new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.
(6) Property Rights	Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.
(7) Permits	Applications for both state and local government permits should be processed in a timely and fair manner to ensure predictability.
(8) Natural resource industries	Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands and discourage incompatible uses.
(9) Open space and recreation	Retain open space and green space, enhance recreational opportunities, enhance fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.
(10) Environment	Protect and enhance the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.
(11) Citizen participation and coordination	Encourage the involvement of citizens in the planning process, including the participation of vulnerable populations and overburdened communities, and ensure coordination between communities and jurisdictions to reconcile conflicts.
(12) Public facilities and services	Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.
(13) Historic preservation	Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.
(14) Climate change and resiliency	Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and chapter 47.80 RCW adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice.

GMA Goal	Text
(15) Shorelines	For shorelines of the state, the goals and policies of the shoreline management act as set forth in RCW 90.58.020 shall be considered an element of the county's or city's comprehensive plan.

Sources: RCW 36.70A.020 and RCW 36.70A.480(1), 2023.

Jurisdictions planning under the GMA are required to balance these goals in the development and adoption of their comprehensive plans and development regulations. Counties and cities in most parts of the state—including the City of Spokane—must prepare comprehensive plans that include objectives, principles, standards, and a future land use map. Required elements of the comprehensive plan include land use, housing, capital facilities plan, utilities, rural (for counties), transportation, economic development, parks and recreation, and climate change and resiliency. Local governments may include other elements if they wish. Development regulations, such as zoning, must be consistent with the local government's Comprehensive Plan. Counties and cities must be up to date with the requirements of the GMA, including the Periodic Update requirements, to be eligible for grants and loans from certain state infrastructure programs.

Countywide Planning Policies

The GMA requires counties and cities to collaboratively develop countywide planning policies (CPPs) to set the general framework for coordinated land use and population planning between a county and its cities to ensure comprehensive plans are consistent with each other (RCW36.70A.210). The role of the CPPs is to coordinate comprehensive plans of jurisdictions in the same county regarding regional issues and issues affecting common borders (RCW 36.70A.100).

The Spokane County CPPs were adopted December 22, 1994, and were last amended December 13, 2022. The CPPs aim to promote resident participation, neighborhood character, aquifer protection, environmental justice, environmental sustainability, urban growth areas, economic vitality, the Fairchild Air Force Base, and the Spokane International Airport.

Key topics covered by the CPPs include joint planning in the urban growth areas (UGAs) and the promotion of contiguous and orderly development and provision of urban services; retention of open space and development of parks and recreation; coordinated and efficient multimodal transportation systems based on regional priorities and corridors that can provide high-capacity transportation; the siting of capital facilities with active resident involvement; economic growth that protects Fairchild Air Force Base as a key economic resource; recognizes the environment as a regional economic asset; establishes regional planning relationships with adjacent counties and the State of Idaho; and enhancement of downtowns and commercial and industrial opportunities in cities.

The CPPs also aim to support affordable housing through the analysis of existing and projected housing needs, identification of sufficient land for housing, and adequate provisions of this need for all economic segments of the community, encouraging the development of diverse housing stock

accessible to a range of household type and promoting accessibility. It also promotes coordination of housing, transportation, and economic strategies. As part of the Periodic Update, Spokane County has updated its CPPs to better support affordable housing by meeting state requirements under HB 1110 and HB 1220. The amendments expand Policy Topic 7 to guide housing allocations, promote diverse housing for all household types, address racial disparities and displacement, preserve existing affordable housing, and coordinate housing with transportation and economic strategies. The update also adds a new policy topic on climate change and resiliency.

Housing targets were set considering GMA requirements and through a consultation process between Spokane County and each city. Through that process, the City of Spokane should plan for 22,359 dwelling units between 2020 and 2046. The City must also plan for housing targets by income band. See **Exhibit 3.6-2**. **Section 3.5 Population, Employment, and Housing** provides a discussion of affordable housing and the remaining need for 2023-2046.

Exhibit 3.6-2. Net New Housing Units and Emergency Housing Need, 2020-2046

Total Housing Need	0-30% AMI		30-50% AMI	50-80% AMI	80-100% AMI	100-120% AMI	>120% AMI	Emergency Housing
	Non -PSH	PSH						(Beds)
22,359	6,452	1,851	4,413	2,631	1,418	1,170	4,424	983

Notes: AMI = Area Median Income; PSH = Permanent Supportive Housing;
This is based on the Department of Commerce Housing Allocation Planning tool.
Source: City of Spokane, 2024.

Spokane Regional Transportation Council

The Spokane Regional Transportation Council (SRTC) develops policies and coordinates decisions about regional transportation over the next 20 years through its Metropolitan Transportation Plan (MTP) (Spokane Regional Transportation Council, 2025). Updated every four to five years, the MTP includes coordination with other local and regional planning efforts and includes: significant project, plans, and programs; key transportation challenges; future opportunities; regional growth projections; and strategies to meet future needs. SRTC is currently updating its long-range transportation plan, Horizon 2050. Horizon 2045 is the region's current long-range plan, adopted by the SRTC Board of Directors on December 9, 2021. It serves as both the regional transportation plan (RTP) and MTP for Spokane County. The SRTC has a role to certify transportation elements of comprehensive plans.

Horizon 2045 (Spokane Regional Transportation Council, 2021) is a plan for an integrated, accessible, and multimodal transportation system through 2045. It establishes guiding principles and policies to achieve the regional vision and align with statewide transportation goals. Its regional vision focuses on economic vitality, cooperation and leadership, stewardship, system operations, maintenance, preservation, safety and security, and quality of life. See **Exhibit 3.6-3**.

Exhibit 3.6-3. SRTC Horizon 2045 Topic Area Principles

Topic Area	Guiding Principles
(1) Economic Vitality 3 Policies	Promote economic vitality and prioritize transportation investment.
(2) Cooperation and Leadership 5 Policies	Provide a regional forum for transportation planning and funding.
(3) Stewardship 5 Policies	Protect the environment and minimize impacts from transportation.
(4) System Operations, Maintenance, and Preservation 2 Policies	Maximize the operations and physical condition of the transportation network.
(5) Safety and Security 4 Policies	Maximize operations and physical condition of the transportation network.
(6) Quality of Life 5 Policies	Improve choice and mobility.

Source: SRTC Horizon 2045.

Horizon 2045 estimates future conditions based on employment, housing, and employment density travel forecasting models. For the City of Spokane, Horizon 2045 anticipates concentrated growth and density through 2045, supporting density and development through the City's Centers and Corridors strategy. Housing density is anticipated in the Central Core of Spokane, specifically Downtown Spokane and West Central Neighborhood; in Northeast Spokane specifically along the Division Corridor and the neighborhoods of Shiloh Hills and Hillyard; and in South Spokane, specifically the Lincoln Heights neighborhood. Horizon 2045 anticipates employment growth in relation to activity centers in the Central Core of Spokane, along the Division Corridor, in Northeast Spokane near the Hillyard neighborhood, in West Plains, and in South Spokane near the Southgate and Lincoln Heights neighborhoods. Other areas include Northwest Spokane, specifically the Audubon/Downriver neighborhood.

Horizon 2045 anticipates growth outside of the City of Spokane throughout the region, particularly in the cities of Spokane Valley, Liberty Lake, and Airway Heights. The City of Spokane provides water service to parts of Airway Heights and Spokane Valley. Additional studies and plans conducted by SRTC include the Regional Safety Action Plan and DivisionConnects. These plans identify strategies for increasing the safety of multi-modal travel by changing street cross-sections to manage speeds and accommodate multiple travel options through infrastructure investments.

THRIVE Spokane – Comprehensive Economic Development Strategy

The Greater Spokane Inc. "THRIVE Spokane" is the region's five-year comprehensive economic development strategy (CEDS) developed in accordance with the US Economic Development

Administrations CEDS requirements. While it is not a regulatory requirement, it is a strategic framework that aligns economic development efforts, guides public and private investment, workforce development, and infrastructure priorities throughout the Greater Spokane region. It represents countywide economic development in collaboration with jurisdictions, community partners, education institutions, downtown associations, chambers, transportation councils, and community members. Alignment can support the Spokane region in pursuing federal and state funding. Updated in 2022, THRIVE Spokane and its action plan include the four following goals:

- **Goal 1: Recovery and Resiliency** – Target efforts that prepare the region to avoid, withstand, and recover from economic shocks and natural disasters.
  - Strategies and actions include investments to reduce employment barriers (e.g., efficient routes to connect workers to employment centers and development of a diverse set of attainable housing options), and investment in the development of downtowns and commercial centers, including pursual of redevelopment for mixed-income, mixed-use developments.
- **Goal 2: Competitiveness** – Position the Greater Spokane region as a strong competitor to attract talent, capital, and resources for strategic economic development.
  - Strategies and actions include equitable real estate development; investment in mixed-use projects; the expansion and preservation of a full range of housing options that target new housing developments in areas that connect low-income workers with growth employment centers; and exploration of zoning policy changes to reduce barriers to housing development,
- **Goal 3: Equitable Growth** – Seek to understand, address, and dismantle outcome disparity through intentional initiatives that include all Spokane residents in the benefits of economic growth and prosperity.
  - Strategies and actions include sustainable funding for coalitions accountable to the communities they serve, resources to build capacity and support BIPOC business owners, equitable economic and workforce development, reduction in barriers to public-private development projects and real estate development by community-based entities, recruitment and funding of housing industry innovators, and plan for the protection and incremental expansion of transportation-oriented business districts by increasing allowable housing and commercial districts.
- **Goal 4: Connectivity** – Promote the interconnectedness of Greater Spokane and drive cross—sector partnerships to align efforts that advance economic opportunity for all.
  - Strategies and actions focus on prioritized infrastructure investments, including prioritizing transit-oriented development, investment in public space activation, proactive engagement with community-based organizations, and investment prioritization in multimodal and intermodal transportation to maximize connectivity.

Local Framework

Spokane's Existing Comprehensive Plan

The City of Spokane's existing Comprehensive Plan, Shaping Spokane, is a 20-year vision and roadmap for Spokane's future (City of Spokane, 2023). The plan guides City decisions on where to build new jobs and housing, how to improve the transportation system, and where to make capital investments, such as utilities, sidewalks, schools, and parks. Shaping Spokane is the framework for the City's broad decisions on how to grow while recognizing and improving existing city neighborhoods.

The Comprehensive Plan was first adopted in 2001 consistent with the GMA. It was developed through Spokane Horizons, a community member participation process that involved all segments of the population to help shape the city's future. Since then, the City incorporated minor revisions and updates to the Comprehensive Plan on an annual basis, with significant periodic review updates completed in 2006 and 2017. The current plan was last amended in 2023. This Comprehensive Plan Update is the next significant periodic review.

The Shaping Spokane Comprehensive Plan Update consists of 14 elements – all of which will be reviewed and updated as part of the proposal:

1. Introduction
2. Implementation
3. Land Use Element
4. Transportation Element
5. Capital Facilities and Utilities Element
6. Housing Element
7. Economic Development Element
8. Urban Design and Historic Preservation Element
9. Natural Environment Element
10. Social Health Element
11. Neighborhoods Element
12. Parks and Recreation Element
13. Local Governance and Citizenship Element
14. Shorelines Element

The vision of the City of Spokane's Comprehensive Plan is:

> *"Spokane will be a city of people living and working together where diverse interests, including neighborhoods, business, education, and government, build upon the community's past accomplishments and heritage to ensure an exceptional sense of community, a healthy environment, and a high quality of life."*

The appendices include a summary of the GMA and CPPs, the full text of the CPPs as of 2011, the Horizons Process and the Ahwahnee Principle, the Capital Facilities Plan Technical Appendix, the Transportation Technical Appendix, Population Projections, Neighborhood Profiles, a Work Plan Matrix, Neighborhood Planning Resolutions, and Public Outreach conducted for the current Comprehensive Plan.

Land Use Element

The Land Use Element includes goals and policies that guide the physical form and activities allowed in the city, with policies under each goal that provide direction on implementation of these goals. See **Exhibit 3.6-4**.

Exhibit 3.6-4. City of Spokane Comprehensive Plan - Land Use Element Goals

Goal	Text
LU 1	**Citywide Land Use:** Offer a harmonious blend of opportunities for living, working, recreation, education, shopping, and cultural activities by protecting natural amenities, providing coordinated, efficient, and cost effective public facilities and utility services, carefully managing both residential and non-residential development and design, and proactively reinforcing downtown Spokane's role as a vibrant urban center.
LU 2	**Public Realm Enhancement:** Encourage the enhancement of the public realm.
LU 3	**Efficient Land Use:** Promote the efficient use of land by the use of incentives, density, and mixed-use development in proximity to retail businesses, public services, places of work, and transportation systems.
LU 4	**Transportation**: Promote a network of safe and cost effective transportation alternatives, including transit, carpooling, bicycling, pedestrian-oriented environments, and more efficient use of the automobile, to recognize the relationship between land use and transportation.
LU 5	**Development Character:** Promote development in a manner that is attractive, complementary, and compatible with other land uses.
LU 6	**Adequate Public Lands and Facilities:** Ensure the provision and distribution of adequate, public lands and facilities throughout the city.
LU 7	**Implementation**: Ensure that the goals and policies of the Comprehensive Plan are implemented.

Goal	Text
LU 8	**Urban Growth Area:** Maintain an Urban Growth Area that includes areas and densities sufficient to accommodate the city's allocated population, housing and employment growth for the succeeding twenty-year period, including the accommodation of the medical, governmental, educational, institutional, commercial, and industrial facilities related to such growth, but that does not exceed the area necessary to accommodate such growth.
LU 9	**Annexation:** Support annexations that enhance effective and efficient government.
LU 10	**Joint Planning:** Support joint growth management planning and annexation requests which best meet the Comprehensive Plan's development goals and policies.

The Land Use Element also includes a Future Land Use Map with several designations.

- Neighborhood Center
- District Center
- Employment Center
- Corridor
- Regional Center (Downtown)
- Center & Corridor Core
- Center & Corridor Transition
- Heavy Industrial
- Light Industrial
- General Commercial
- Neighborhood Retail
- Neighborhood Mini-Center
- Office
- Institutional
- Residential 15+
- Residential 15-30
- Residential 10-20
- Residential 4-10
- Agriculture
- Conservation Open Space
- Potential Open Space
- Open Space
- Mining

Centers and Corridors Growth Strategy

The City of Spokane adopted a planning strategy to focus growth toward centers and corridors (City of Spokane, 2025). Adopted in 2001 following a public outreach process called Spokane Horizons, associated land use policies implemented in December 2005 helped define key characteristics of these centers and corridors. These locations are characterized by the ability to accommodate new housing within a short walking or rolling distance of shopping, services, public transit, and other amenities. The planning strategy identified twenty-three centers and corridors throughout Spokane, ranging from neighborhood centers such as Garland Avenue and Perry Street to shopping destinations such as Shadle Park and Lincoln Heights. Associated policies and regulations aimed to support these locations and foster further investment in a mix of shopping, retail, services, and housing.

Center and corridor land use policies promote the efficient use of land by promoting density and mixed-use development in proximity to retail businesses, public services, places of work, and transportation systems. It is a strategy that directs growth to areas where adequate services and facilities are available. There are five different Center designations throughout the city (City of Spokane, 2023):

- **Neighborhood Centers:** Neighborhood Centers have a greater intensity of development than the surrounding residential areas. Businesses primarily cater to neighborhood residents in the form of convenience and service businesses. Density of housing supports frequent transit and neighborhood businesses. Buildings orient to the street to allow for a more inviting pedestrian environment, and the layout of buildings should promote active modes of transportation.
- **District Centers:** District Centers resemble Neighborhood Centers but allow for a greater intensity of all uses. District Centers serve a large portion of the surrounding neighborhoods and include gathering spaces, civic centers, large retail, and housing areas as part of a major activity hub. Buildings orient to the street and pedestrian access is vital to the surrounding residential areas. District Centers have frequent transit service, walkways, and bicycle paths
- **Employment Centers:** Employment Centers allow similar intensities of all use types as Neighborhood and District Centers, but include a strong, non-service oriented, employment component.
- **Corridors:** Corridors, the connection between Centers and the Downtown, allow higher intensities of all use types. They resemble District and Neighborhood Centers, but with a greater focus on improving the street network to allow people to move from one Center to the next via multiple modes of transportation.
- **Regional Centers:** Downtown Spokane is the only Regional Center and is the hub for shopping, dining, arts and culture, entertainment, and academics across the region.

Relevant Land Use Policies

- LU 3.2 Centers and Corridors - Designate Centers and Corridors (neighborhood scale, community or district scale, and regional scale) on the Land Use Plan Map that encourage a mix of uses and activities around which growth is focused.

- LU 3.3 Designating Centers and Corridors – Designate new Centers and Corridors in appropriate locations on the Land Use Plan Map through a City-approved planning process.
- LU 3.4 Planning for Centers and Corridors - Conduct a City-approved subarea planning process to determine the location, size, mix of land uses, and underlying zoning within designated Centers and Corridors. Prohibit any change to land use or zoning within suggested Centers or Corridors until a sub area planning process is completed.
- LU 3.5 Mix of Uses in Centers - Achieve a proportion of uses in Centers that will stimulate pedestrian activity and create mutually reinforcing land uses.
- LU 3.6 Compact Residential Patterns - Allow more compact and affordable housing in all neighborhoods, in accordance with design guidelines.

In 2024, the City completed a study (Makers et al., 2024) to evaluate updates or changes to this growth strategy. While still designating centers and corridors in the land use map, the study recommends evolving the existing Center and Corridor zones into an updated family of mixed-use zones.

The study identified four key recommendations, including:

- Recommendation 1 – Establish a new set of mixed-use zones
- Recommendation 2 – Address allowed building height
- Recommendation 3 – Update block frontage standards
- Recommendation 4 – Increase connectivity

The recommended revisions to the zones seek to better align with current development practices and building styles, while maintaining support for the development of walkable street frontages and accessibility.

Capital Facilities Element and Capital Improvement Program

The Capital Facilities Element contains goals and policies that are carried forward with specific projects and matching revenues in a Capital Improvement Program.

- CFU 1 Adequate Public Facilities and Services - Provide and maintain adequate public facilities and utility services and reliable funding in order to protect investment in existing facilities and ensure appropriate levels of service.
- CFU 2 Concurrency - Ensure that those public facilities and services necessary to support development are adequate to serve the development and available when the service demands of development occur without decreasing current service levels below locally established minimum standards.
- CFU 3 Coordination - Promote contiguous, orderly development and provision of urban services through the regional coordination of land use and public services related to capital facilities and utilities.
- CFU 4 Service Provision - Provide public services in a manner that facilitates efficient and effective delivery of services and meets current and future demand.

- CFU 5 Environmental Concerns - Minimize impacts to the environment, public health, and safety through the timely and careful siting and use of capital facilities and utilities.
- CFU 6 Multiple Objectives - Use capital facilities and utilities to support multiple interests and purposes.

Annually, the City adopts a capital improvement program addressing a six-year period that includes major projects that work to address repair, replacement, and capacity related to growth. The current program is 2025-2030, and the City is currently processing the 2026-2031 update. The program addresses improvements towards the Spokane Police Department; the Spokane Fire Department; Spokane Parks & Recreation, including trail connections; transportation; water; wastewater; solid waste; information technology; the city-owned fleet services; and facilities management.

Other Elements

Other relevant elements to highlight in the existing Comprehensive Plan include Transportation, Housing, Economic Development, and Neighborhoods.

Transportation

The Transportation Element focuses goals and policies on promoting transportation choices and accessibility for all users, aligning transportation projects with economic vitality and land use objectives, prioritizing active transportation network projects and connectivity access in neighborhoods, improving multimodal transportation options particularly in Centers (e.g., District Centers, Neighborhood Centers, Employment Centers, Corridors, Downtown, and Regional Centers), and promoting safety and demand management to ensure efficient network capacity.

Housing Element

The Housing Element focuses goals and policies on promoting housing choice and diversity of housing types that are safe and affordable for all income levels; improving housing quality and encouraging home preservation and rehabilitation of older neighborhoods; encouraging home ownership; and encouraging housing for lower-income community members throughout the city.

Economic Development Element

Relevant goals and policies in the Economic Development Element focus on ensuring adequate supply of useable industrial and commercial property is available, including the support of mixed-use development to stimulate economic activity and vitality, promoting a range of employment and businesses.

Neighborhoods Element

The Neighborhood Element focuses on recognizing downtown Spokane as the primary regional economic and cultural center and as mixed-use neighborhood with a diversity of housing; developing neighborhoods that feel like small towns and provide a variety of compatible services; promoting

alternative modes of transportation and circulation in neighborhoods, including multimodal transportation; increasing open space, trails, and pedestrian connections within and between neighborhoods; protecting and enhancing the natural environment; and promoting social amenities and a sense of community.

Neighborhood and Subarea Plans

The 2001 Comprehensive Plan Update included policies that called for neighborhood planning (City of Spokane, 2025). In 2007, the City set aside $550,000 to be used for neighborhood planning, distributed funds, and created the Community Assembly to guide neighborhoods through the neighborhood planning process that identifies issues, solutions, and results tracking. The neighborhood plans can then be used to develop a project plan for a specific project (Track 1) , develop a visioning plan that may include specific requests for future land use revisions or amendments to the Comprehensive Plan (Track 2), or can be adopted by ordinance and incorporated into the Comprehensive Plan (Track 3) (City of Spokane, 2021). Of the neighborhood-focused planning efforts, the following have been adopted by ordinance and incorporated into the Comprehensive Plan:

- Spokane Downtown Plan, adopted in 2021.
- South University District Subarea Plan, adopted in 2020.

The neighborhood plans, with the exception of the above Downtown Plan, have not been adopted by ordinance.[1]

Northwest Spokane

Neighborhood Planning Efforts

These plans are the result of neighborhood planning efforts and, though not formally adopted into the Comprehensive Plan, are acknowledged by the City and play a role in guiding development and informing policy.

Emerson Garfield

Emerson-Garfield is a centrally located Spokane neighborhood just north of downtown, bounded roughly by Division Street on the east, Cora Avenue to the north, and portions of Indiana Avenue and Monroe Street to the south and west. The neighborhood action plan envisions Emerson-Garfield as "a diverse and vibrant neighborhood actively supporting a thriving business district, strong residential areas, beautiful parks, walkable amenities, and a unique historic character." (Emerson-Garfield Neighborhood Council, 2014). Key priorities identified through a collaborative planning process include pedestrian safety (addressing dangerous crossings, lack of sidewalks, and high-traffic arterials

[1] The City adopted the South Logan TOD Plan by resolution in 2024. It then implemented the TOD Plan's proposed land use and zoning through a comprehensive plan amendment.

like Monroe, Indiana, and Northwest Boulevard); neighborhood beautification; business diversity and occupancy; community resources; alternative and public transportation; and neighborhood connectivity and events.

The plan places particular emphasis on improving land use along the Monroe Street corridor and enhancing the pedestrian environment with complete streets strategies—such as crosswalks, ADA ramps, lighting, and traffic-calming measures. This top priority supported the development of the North Monroe Corridor Project 2018 (City of Spokane, 2016), a project to improve the Monroe Street Corridor by improving safety, enhancing the streetscape, and reconfiguring traffic on North Monroe Street. Construction began in 2018 (City of Spokane, 2018).

City Council recognized it by resolution in July 2014 (City of Spokane, 2014).

Five Mile Prairie

The Five Mile Prairie Neighborhood, located in the northwest corner of Spokane and bordered on three sides by unincorporated Spokane County, is primarily residential with two major parks, Sky Prairie Park and Austin Ravine Conservation Area. Its neighborhood plan focuses exclusively on improving pedestrian and bicycle safety and connectivity (Five Mile Prairie Neighborhood, 2012), outlining 21 capital improvement projects aimed at enhancing walking and biking facilities. Key priorities include creating safer routes for pedestrians and cyclists; improving connections between homes, schools, parks, and neighboring areas; and integrating local improvements with broader city policies and capital plans. The plan emphasizes linking residential areas with community destinations to encourage active transportation and reduce reliance on cars. It also identifies a potential future study area for additional planning and infrastructure needs. By targeting strategic connections and safety upgrades, the plan seeks to create a more accessible and connected neighborhood for all residents. City Council passed a resolution in 2012 to recognize the plan as a priority planning document for the neighborhood; the recommendations have not yet been incorporated in the Comprehensive Plan (City of Spokane, 2012).

North Hill

The 2015 North Hill Neighborhood Action Plan emphasizes connectivity, safety, livability, and a vibrant community (North Hill Neighborhood Council, 2015). Priorities include boosting commercial vitality in the Garland District; increasing safety; enhancing public spaces; implementing pedestrian connectivity and traffic calming measures; and preserving the South Bluffs as open space. The plan supports local businesses, mixed-use development along Division Street and the Garland District, and improved pedestrian and bike connections—especially between residential areas and the Garland District—within broader city transportation plans. Predominantly low intensity residential, North Hill also includes commercial and higher intensity areas along its eastern edge and in the Garland Neighborhood Center. Bounded by Francis Avenue, Division Street, Courtland and Cora Avenues, and Ash Street, it serves as a transition between downtown and northern residential neighborhoods. The City Council adopted the neighborhood plan by resolution in July 2015 (City of Spokane, 2015).

Shadle District (Northwest & Audubon / Downriver neighborhoods)

The Shadle Area Neighborhood Plan, adopted by resolution by City Council in 2019 (City of Spokane, 2019), provides a long-range vision to guide development in this designated District Center (SCJ Alliance, 2019). The plan emphasizes pedestrian-oriented, mixed-use growth supported by CC1 and CC2 zoning, encouraging diverse housing options such as townhomes, multi-units, and senior housing. It prioritizes public realm improvements—particularly along Wellesley, Belt, Alberta, and Ash—to slow traffic, improve walkability, and support mixed-use intensification. Key focus areas include enhancing transportation connectivity with safer crossings, bike access, and transit improvements; creating more housing diversity to support affordability and aging in place; and improving public spaces like Shadle Center and Shadle Park to foster community identity and accessibility. Investments aim to create strong pedestrian and bicycle links to surrounding neighborhoods, reduce surface parking, and encourage storefront-oriented development. The plan anticipates gradual transformation, with incremental public and private investment shaping the district's evolution into a vibrant center connected to other parts of Spokane through frequent and accessible transit.

West Central

Completed in May 2012, the West Central Neighborhood Action Plan outlines priorities across land use, transportation, community facilities, housing, design and historic preservation, parks and open space, social needs, and economic development (West Central Neighborhood, 2012). Key land use goals include attracting commercial and light industrial investment while protecting single unit residential areas through land use regulation enforcement. Transportation priorities focus on adding bike lanes and multimodal options to connect the neighborhood to downtown and expand options for low-income households. The plan calls for maintaining and improving community centers; encouraging homeownership and infill housing development; investing in historic streets and housing stock; protecting and enhancing open space; fostering a safe and inclusive community with opportunities for all ages; and supporting local businesses while attracting new economic investment. Located north and west of the Spokane River, the neighborhood is bounded to the south by West Indiana Avenue and to the east by North Monroe Street. Through these strategies, the plan seeks to preserve West Central's historic character while promoting growth, connectivity, and community well-being. The City Council passed a resolution in February 2013 to recognize the planning efforts of the West Central Stakeholder Group and the West Central Neighborhood Action Plan (City of Spokane, 2013).

Related planning in West Central includes programming of traffic calming and transportation improvements through the West Central Infrastructure Project. This neighborhood-led study, completed in 2024, reassessed and prioritized projects originally listed in founding legislation for the West Quadrant Tax Increment Finance District.

West Hills

West Hills Neighborhood developed the Fort George Wright Drive Station and Corridor Plan, with planning efforts focused on the Fort George Write Boulevard (now Whistalks Way) and Spokane Falls Community College area (City of Spokane, 2016). Plan development included collaborative efforts from Spokane Falls Community College, Mukogawa Institute, Spokane Transit Authority, the West Hills Neighborhood Council, River Run PUD, and other entities. The plan focused on addressing immediate public safety needs, improving provision of transit, encouraging new land uses, boosting bike and pedestrian connectivity, and identifying supporting actions to develop a cohesive neighborhood center. The City Council recognized the Fort George Wright Drive Station and Corridor Plan by resolution in late 2016 (City of Spokane, 2016).

Future neighborhood planning projects

Future neighborhood planning projects in Northwest Spokane include Balboa / South Indian Trail.

Northeast Spokane

Hillyard Subarea Plan

The Hillyard Subarea Plan is a combined effort of the City of Spokane and the Northeast Public Development Authority (NEPDA) to define a vision for the Hillyard neighborhood in the northeast corner of the city (Northeast PDA, 2025). The City Council formally recognized and adopted the plan by resolution in November 2025.

Goals, strategies, and actions included in the plan are guided by the following vision to "rediscover Hillyard's history, assets, community, and potential through an actionable plan centered on physical enhancements, supportive infrastructure and land use planning." It is focused on six key vision themes that include: create distinctive places; enhance livability; achieve economic vitality; improve services; and identify implementation strategies.

The subarea plan addresses land use and infrastructure throughout the Hillyard neighborhood. The plan also identifies catalyst sites to help focus targeted redevelopment efforts, with the underlying zone driving the resulting development

South Logan TOD Plan

The South Logan Transit-Oriented Development (TOD) Project supports increased connectivity and livability in the South Logan area, located in the Logan neighborhood of Spokane. (City of Spokane, 2025). Its study area is focused on areas up to a half mile around three City Line bus rapid transit stations in the South Logan area of the Logan Neighborhood. This area includes the Hamilton Street Corridor, Gonzaga University, the new UW and Gonzaga health sciences center, Mission Avenue Historic District, local businesses and organizations, Mission Park, Upriver Park, Centennial Trail, and the Spokane River. The City Council approved the South Logan TOD Plan by resolution in early 2024, with land use and zoning changes as well as citywide and area-specific amendments to the Spokane Municipal Code approved later in 2024.

The South Logan TOD Plan (City of Spokane, 2024) values include enhancing connectivity, accessibility and mobility; supporting universities and health sciences; supporting job access, diverse industries, and employment; expanding housing options and affordability for residents of all incomes and ages; minimizing residential and local business displacement; and building on the neighborhood's diverse urban context and history with integrity.

Plan recommendations include pairing transit infrastructure investments with targeted investments in public spaces; increasing active transportation connections and improvements; making strategic updates to zoning, design standards, and regulations to encourage private investment; and drawing in more businesses and residents to the area while also applying anti-displacement efforts to keep existing community members and anchors. Its efforts build on the Logan Neighborhood Identity Plan, adopted by resolution in May 2014, and the Hamilton Street Corridor form-based code, adopted by ordinance in 2015. Added as a new chapter to the Title17C Land Use Standards of the Spokane Municipal Code, the Hamilton Street Corridor form-based model code aimed to foster an economically vibrant, walkable, mixed-use environment along the Hamilton Corridor.

Neighborhood Planning Efforts

These plans are the result of neighborhood planning efforts and, though not formally adopted into the Comprehensive Plan, are acknowledged by the City and play a role in guiding development and informing policy.

Bemiss, Hillyard, and Whitman neighborhoods

The Greater Hillyard Northeast Planning Alliance (GHNPA) neighborhood strategic plan covers Bemiss, Hillyard, and Whitman neighborhoods in northeast Spokane (Greater Hillyard Northeast Planning Alliance, 2010). It identifies ten strategic areas, including parks and trails; housing and commercial buildings; public safety; economic development; transportation and infrastructure; and community organization. Land use priorities focus on maintaining and upgrading housing and enhancing commercial buildings. Community facility and infrastructure goals include improving parks and trails, as well as developing East Hillyard's industrial corridor and a Manufacturing Development Center. Organizational priorities call for stronger neighborhood-level structures to coordinate efforts and resources.

The plan's vision is for a safer, greener, and better-connected East Spokane, where housing and economic development thrive alongside community pride, civic engagement, and a positive neighborhood image. It promotes a collaborative approach among residents, nonprofits, neighborhood councils, businesses, and the City to implement a unified revitalization strategy. Through sustained partnerships, the three neighborhoods aim to foster economic opportunity, enhance livability, and strengthen the community's identity. GHNPA finalized its report and final proposals in 2010.

Chief Garry Park

The Chief Garry Park neighborhood is in the central section of northeast Spokane. It is predominantly comprised of single unit residential, with retail at Mission and Napa Street and near Spokane Community College. Prominent landmarks include Spokane Community College in the center of the neighborhood, Felts Field to the east, and Spokane River forming the northern border. The vision of its neighborhood action plan identifies Chief Garry Park as a "strong residential neighborhood with thriving businesses, attractive and connected parks, and accessible transit and pedestrian amenities" (Chief Garry Park Neighborhood Council, 2017). The action plan focuses on pedestrian safety, beautification, economic development, connectivity, and preserving neighborhood character. Its priorities include encouraging higher density residential and mixed-use development near transit, particularly at Mission Avenue and Napa Street and Mission and Greene Street near City Line stations. Other priorities include placemaking strategies; pedestrian and trail enhancements, specifically toward the Iron Bridge; and identifying TOD that aligns with the City Line bus rapid transit. In 2017, the City Council passed a resolution recognizing the neighborhood action plan as a guide for the neighborhood's desired direction for local activities and priority projects (City of Spokane, 2017).

East Central

East Central is located in the southern part of Northeast Spokane, just east of Center City. It is between Division Street and Havana Street, with Interstate-90 running east-west through the neighborhood. It includes an employment center along Sprague Avenue, a neighborhood center along Perry Street, various neighborhood retail locations, and Liberty Park. To form the East Central Neighborhood Plan, the East Central Planning Stakeholder Group built on previous planning efforts in the neighborhood and prioritized making improvements to the Ben Burr Trailhead to help link the neighborhood more effectively to the Centennial Trail (East Central Neighborhood Partnership Center, 2006). The plan reflects a focused, project-based approach that upgrades recreational infrastructure and fosters connectivity within East Central. It was adopted as a neighborhood planning document by City Council resolution on March 27, 2006.

- **ReFIVE 5th Avenue Community Plan:** The City is currently in the planning process for the 5th Avenue community in the East Central neighborhood (City of Spokane, 2025). Located south of I-90 around the 5th Avenue corridor in the southeast section of the East Central neighborhood, the area includes the historical Black business district and diverse community organizations.

Nevada Lidgerwood Neighborhood

The Nevada Lidgerwood neighborhood is located in Northeast Spokane, approximately bound by Division Street to the west, Perry and Crestline Streets to the east, Lincoln Avenue to the north, and East Euclid Avenue to the south. Key streets include Nevada Street and Addison Street running north-south. In 2009-2010, neighborhood residents and businesses identified important issues and solutions to improve the neighborhood (EWU URP Program, 2011) (Eastern Washington University's Planning Team, 2011), which focused on non-motorized travel safety, traffic patterns, volume, and speed. City Council recognized the neighborhood's planning efforts by resolution in January 2012 (City of Spokane, 2012).

Future neighborhood planning projects

Other Future Neighborhood Planning Efforts

- **Shiloh Hills** – Annexed to the City in the 1960s, Shiloh Hills is a newer neighborhood that split from the Nevada / Ledgerwood Neighborhood; it is north of East Francis Street and west of North Division Street. Recent planning efforts have focused on traffic calming efforts, including street art and traffic islands (Shiloh Hills Neighborhood Council, 2025).

Division Corridor

DivisionConnects and the Division Street TOD Project

In 2021 and 2022, SRTC and Spokane Transit Authority (STA) led a two-year transportation and land use study that identified opportunities and challenges on Division Street. The Phase 1 Corridor Development Plan was adopted by SRTC Board of Directors on June 10, 2021, and the Phase 2 Vision and Implementation Strategy was adopted by the SRTC Board on September 8, 2022.

Phase 1 evaluated bus rapid transit (BRT) along Division Street and other corridor transportation elements (SRTC; STA, 2021). Its findings focus on implementation steps that transition the corridor from local to BRT service, securing funding, finalizing station locations, and development of transit-supportive strategies including supportive land uses along the corridor and multimodal transportation modes.

Phase 2 focused on opportunities and challenges on Division Street with the completion of the North Spokane Corridor, including the evaluation of active transportation capital investments and areas where land use changes may occur to create TOD (SRTC, 2022). Phase 2 discusses revisiting zoning policies to achieve a mixed-use Division Street BRT corridor that optimizes TOD opportunities.

In 2024, the City, STA and the County initiated a joint planning effort, currently underway, to develop the Division Street Transit-Oriented Development Plan using funding from the Federal Transit Administration's Pilot Program for Transit Oriented Development. The plan focuses on aligning land use, zoning, and infrastructure to make the most of upcoming transit investments on the Division Street corridor. The final plan is anticipated in Winter 2025.

Related Neighborhood Plans

Other adopted subareas and neighborhood plans overlap with the Division Corridor. See the North Hill neighborhood plan in the **Northwest Spokane** section, and the **South Logan TOD Plan** and Nevada Lidgerwood neighborhood planning efforts in the **Northeast Spokane** section.

Center City

Spokane Downtown Plan

Approved by City Council and adopted as a subarea plan by ordinance in 2021, the Spokane Downtown Plan outlines the community's vision for the Downtown subarea through 2031 (Downtown Spokane Partnership, 2021). Through a collaborative process between the City and the Downtown Spokane Partnership, which oversees the Downtown Business Improvement District, the plan identifies five goals including:

- A connected and walkable Downtown.
- Thriving arts, culture and historic places.
- A great place to live, work, and play.
- Welcoming and engaging public spaces for all.
- A well-organized Downtown.

To align its goals and vision in the plan, it also identifies 15 priority actions including a focus on multimodal transportation and walkable pedestrian-focused street design; infill development focused on small businesses, start-ups, arts, and culture; and integrated parks and public space.

South University District Subarea Plan

The South University District lies south of the main University District campus (east of Downtown Spokane), south of the BNSF tracks up to I-90, and north of the South Hill medical district. Adopted by ordinance in 2020, the South University District Subarea Plan reaffirms and adopts the vision, goals, and policies for the district (City of Spokane, 2020). It outlines the City and East Central Neighborhood Council's priorities for new growth and investment, with the vision for it to emerge as a "true gateway."

Key themes addressed include land use transitions that align with pedestrian activity; transportation improvements prioritizing walking, biking, and transit; maintaining and adapting existing businesses and historic character; and fostering design through public realm enhancements and neighborhood revitalization. The vision places centers on Sprague and Sherman, the heart of a pedestrian-oriented innovation district. It envisions a lively, mixed-use "urban village" – retail, institutional, residential, artisan/light-industrial uses, housing diversity, public amenities, and walkable streets tying together universities, Downtown, and healthcare areas.

Other Plans

North Bank Subarea Plan

The key findings and issues identified in the Draft North Bank Subarea neighborhood plan (City of Spokane, n.d.) were incorporated into the Downtown Plan Update, adopted by City Council in 2021.

Transit-Oriented Development Framework Study

The Transit Oriented Development (TOD) Framework Study, conducted from 2021 to 2022, built on previous planning efforts including an economic impact study for the City Line in 2014 and a 2017 strategic overlay study for the City Line. The TOD Framework Study developed recommended updates to Center and Corridor zones and rezoning selected station areas, supporting future planning including the completed South Logan TOD Study and the ongoing Division Street TOD Plan. City Council adopted it by resolution in May 2022.

South Spokane

Neighborhood Planning Efforts

These plans are the result of neighborhood planning efforts and, though not formally adopted into the Comprehensive Plan, are acknowledged by the City and play a role in guiding development and informing policy.

Browne's Addition

Browne's Addition is located in South Spokane, north of I-90 and West Sunset Boulevard, east of Latah Creek, and south of Spokane River and Peaceful Valley Neighborhood. It is one of the city's earliest neighborhoods and is designated as a historic district nationally and locally. The Browne's Addition Neighborhood Association developed a master park plan for Coeur d'Alene Park, a nearly 10-acre park in the heart of the neighborhood (Friends of Coeur d'Alene & Browne's Addition Neighborhood Association, 2015). The Spokane Park Board adopted the master park plan in September 2015 (City of Spokane Parks and Recreation, 2015).

Grandview / Thorpe

Located in Southwest Spokane west of Highway 195 and south of I-90, Grandview / Thorpe is a low intensity residential community with strong connections to natural areas and recreational amenities. It is also the location of a former interurban rail line. Adopted by its neighborhood council in 2015, the Grandview / Thorpe Neighborhood Action Plan envisions creating a more connected, walkable, and community-focused Grandview/Thorpe area in Southwest Spokane, blending natural character with neighborhood identity (Grandview/Thorpe Neighborhood Council, 2015). It prioritizes establishing a neighborhood activity center or small-scale retail node, improving trail connectivity through partnerships and easements, and creating gateway features at key intersections like Grandview & 17th and Thorpe Road. The plan also highlights road improvements to enhance walkability and access throughout the neighborhood.

Land use priorities include exploring modifications to the comprehensive plan and zoning to enable neighborhood-serving retail—an option currently not permitted under existing regulations. On the transportation front, emphasis is placed on improving trail access and walking infrastructure, while strategically positioned neighborhood gateways serve both functional and identity-strengthening roles.

The City Council adopted the plan by resolution in November 2015 (City of Spokane, 2015).

Peaceful Valley

The Peaceful Valley Neighborhood is on the south bank of the Spokane River, immediately west of Downtown Spokane and north of Browne's Addition neighborhood. Adopted by resolution by the City Council in 2015 (City of Spokane, 2015), the Peaceful Valley Neighborhood Plan focuses on vibrancy, walkability, and a connected community (Peaceful Valley Neighborhood Council, 2015). Key priorities include improve traffic and pedestrian safety along Clarke and Main avenues, improve crime awareness, and build trust among neighbors. There are also environmental protections, a desire to improve access to parks and recreation, and a desire to preserve the housing quality and historic character of the neighborhood.

South Hill Coalition

Connectivity and Livability Strategic Plan

The South Hill Coalition (SHC), comprising five neighborhoods—Cliff Cannon, Comstock, Lincoln Heights, Manito/Cannon Hill, and Rockwood—collaborated to develop a unified vision for the South Hill area. Adopted as a resolution in 2014 by City Council, the 20-year Connectivity and Livability Strategic Plan is a visionary document to guide improvement in the neighborhood that emphasizes enhancing connectivity, livability, and neighborhood identity (South Hill Coalition, 2014). The plan identifies priority projects aimed at improving infrastructure, promoting sustainable development, and fostering community engagement. These initiatives are designed to create a more cohesive and vibrant South Hill, aligning with the broader goals of the City of Spokane.

The plan's vision focuses on creating a well-connected, livable, and sustainable community that respects the unique character of each neighborhood. Key priorities include enhancing transportation options, improving public spaces, and promoting responsible land use. The plan also emphasizes the importance of community involvement and collaboration in achieving these goals. By addressing these priorities, the SHC aims to ensure that South Hill remains a desirable place to live and work for years to come.

Grand Boulevard Transportation and Land Use Study

To support planning efforts in South Hill, the City conducted the Grand Boulevard Transportation and Land Use Study (City of Spokane, 2020), adopted by resolution in August 2020 (City of Spokane, 2020). It studied the Grand Boulevard segment and set a long-range vision and implementation plan for safety, access, and mobility improvements. Study elements included reviewing traffic patterns and safety on Grand Boulevard; developing an understanding of bicycle and pedestrian needs; evaluating concepts of land reduction, bike lanes, wider sidewalks, and green infrastructure; conducting market analysis for redevelopment potential; studying land use designations and patterns of use; and collecting multimodal traffic data.

Future Neighborhood Planning Projects

Future neighborhood planning projects include Latah/Hangman Neighborhood Action Plan.

The City is also addressing a Strategy for Growth in Latah Valley and exploring needed local transportation improvements and other capital facility improvements. Another effort led by SRTC, together with WSDOT, the City, County, and Spokane Transit Authority, includes the US 195 North/I-90 Transportation Study that produced a study in 2021. The purpose was to develop a long-range transportation strategy for the Latah Valley, Grandview, and Thorpe areas of Spokane and Spokane County.

West Plains

In 2014, the City of Spokane studied subarea planning efforts in the West Plains and issued a Draft West Plains Transportation Subarea Plan. West Plains also has a WSDOT-led "living study" for the West Plains subarea. However, these documents have not been formally adopted.

West Plains Draft Transportation Subarea Plan (2014)

In 2014, the City of Spokane coordinated study efforts with partnering jurisdiction and agencies to study adequate transportation facilities and facilitate anticipated and desired development in the West Plains area (City of Spokane, 2014). Outcomes and recommendations from the Draft Subarea Plan include:

- Increase the overall transportation network density in the West Plains.
- Reserve right-of-way for arterials identified in the updated arterial plan.
- Accommodate and balance multiple modes of transportation.
- Design and improve US 2 to be an attractive entry; encourage new development to promote a distinct character.
- Develop safe and comfortable bike and pedestrian connections between Downtown Spokane and Fairchild Air Force Base and Downtown Spokane and the Spokane International Airport.
- Coordinate, prioritize, and invest in transportation system improvements.
- Anticipate the eventual extension of rights-of-way into urban reserve areas.

These findings were incorporated into the WSDOT West Plains Subarea Transportation Management Plan "living study."

West Plains Transportation Subarea Plan (Ongoing)

Led by WSDOT, the West Plains Subarea Transportation Management Plan is a "living study" that focuses on land use and multimodal transportation solutions in the West Plains Area of the Spokane region (WSDOT - Eastern Region Planning, 2022). As a living study, WSDOT is continuing to update the project webpage (www.connectwestplains.com) with new data as it becomes available. The study area is in and around the US 2 corridor west of I-90 between the Fairchild Air Force Base entrance at Mitchell Street to the west to just east of Russell Road, and it encompasses part of the City of Spokane, as well as the City of Airway Heights and areas of Spokane County, the Fairchild Air Force Base, the Spokane International Airport, and lands of the Kalispell and Spokane Tribes. With land use development in the West Plains vicinity outpacing the available multimodal transportation system in

the area, which has been found to be one of the fastest growing areas in Washington State, the study works to identify potential practice solutions.

Goals, strategies, and early actions in the plan focus on safety, mobility, quality of life, and economic vitality. Regarding land use, strategies are focused on promoting "a more balanced mix of land uses to facilitate shorter trips, use of transit and active transportation, and efficient use of the transportation system" (WSDOT, 2025). Relevant land use strategies prioritize balancing employment growth with housing development.

3.6.2 Impacts

This section reviews the proposed alternatives for consistency with the adopted plans and policies discussed above. Impacts would arise if the alternatives impeded state or regional policies. More specifically, an impact is identified if the alternatives:

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

Impacts Common to All Alternatives

Growth Management Act

Spokane adopted its Comprehensive Plan to comply with the GMA in 2001, with periodic amendments since then. The plan contains the elements required by the GMA, and the City has adopted land use and environment regulations (Title 23 and Title 25 in the SMC) that implement the plan.

The action alternatives would each adopt a new growth strategy, and each element of the Comprehensive Plan would be updated. The plan would continue to focus growth in an urban area with a range of public services and multimodal transportation options, provide for public services like parks and schools, and protect critical areas and environments consistent with the GMA.

The ~~Draft~~ Final EIS alternatives each accommodate the 2046 growth targets and examine different ways the City could distribute its 2046 forecast growth with varying degrees of concentration. Focusing growth within urban areas in this manner is consistent with GMA policies that seek to prevent sprawl and preserve rural areas and resource lands. All alternatives have sufficient zoned vacant and redevelopable land to accommodate the 20-year population, housing, and job allocations. However, Alternative 1 does not have sufficient land capacity to accommodate housing at all income levels, particularly 0-80% AMI. See **Exhibit 3.6-5**.

Exhibit 3.6-5 Growth Management Act Goals - Alternative Evaluations

GMA Goal	Discussion
(1) Urban Growth	Each studied alternative would serve growth with city or municipal services.
(2) Reduce Sprawl	Each studied alternative would focus on redevelopment in an urban environment.
(3) Transportation	Each studied alternative would place most growth in Downtown and along transit corridors. Alternatives 2 and 3 and the Preferred Alternative provide new multimodal level of service and improve accessibility for multiple modes of travel. Alternative 2 would intensify mixed-uses along transit in Downtown, Division Street, other frequent transit routes, and along corridors. Alternative 3 identifies key transportation connections between Center City, West Hills, and the North Spokane Corridor in the Hillyard area, and it includes the planned growth in the 5th Avenue Corridor on the southern end of the corridor. The Preferred Alternative provides for growth in hubs like Downtown, West Hills, and the Hillyard area and frequent transit corridors across the city, blending features of Alternatives 2 and 3.
(4) Housing	All alternatives accommodate housing growth targets. However, Alternative 1 does not provide sufficient capacity for housing at all income levels, particularly 0-80% AMI. Alternatives 2 and 3 and the Preferred Alternative provide for a greater range of housing in addition to middle housing. See also **Section 3.5 Population, Employment, and Housing** for a discussion of how the alternatives impact housing and address new GMA housing requirements in HB 1220.
(5) Economic Development	All alternatives accommodate job targets. Alternative 1 and the Preferred Alternative focus~~es~~ job growth in health/services (Downtown) and industrial (along railroads and near the Spokane International Airport). Alternative 2 supports existing job centers and establishes a job allocation above the 20-year trend linked to jobs/housing balance. Alternative 3 establishes the highest jobs allocation with focused investment in areas with planned transportation investment.
(6) Property Rights	All alternatives support a reasonable use of property.
(7) Permits	All alternatives would implement City policies that promote fair permitting.
(8) Natural resource industries	There are mining resources in the city in the northeast corner, outside the Shiloh Hills neighborhood. Alternatives 2 and 3 and the Preferred Alternative are not anticipated to put housing in proximity, as much of the housing and job growth is concentrated in different locations of the city.

GMA Goal	Discussion
(9) Open space and recreation	All alternatives create demand for parks and recreation under adopted levels of service. The updated Comprehensive Plan could include an updated level of service standard. See **Section 3.8 Public Services**.
(10) Environment	All alternatives focus growth in the urban growth area, with impacts on the environment mitigated through compliance with federal, state, and local regulations. Alternatives 2 and 3 and the Preferred Alternative include development and implementation of climate resilience and greenhouse gas reduction goals and policies per HB 1181, as well as a review and update of critical areas regulations based on best available science. 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 adversely affect cultural resources. See the evaluation and mitigation measures on Cultural Resources in **Section 3.4 Land Use Patterns and Urban Form.**
(14) Climate change and resiliency	The action alternatives add climate planning, which include new climate resilience and greenhouse gas reduction goals and policies per HB 1181. Alternative 1 continues current natural environment policies and critical areas regulation, but these were not designed to meet the new HB 1181 requirements in full.
(15) Shorelines	The City maintains a shoreline master program under the Shoreline Management Act. It is updated periodically under a different timeline. The City must be consistent with the shoreline goals of environmental conservation, public access, and shoreline-oriented uses. All alternatives would continue to maintain the shoreline master program.

Multicounty Planning Policies and SRTC Regional Transportation Plan

Regional policies and alternatives' consistency are evaluated in **Exhibit 3.6-6**. Highlights are described below.

Countywide Planning Policies

Each alternative would provide capacity to meet minimum growth targets for housing and jobs. See **Exhibit 3.6-6**. The ability to produce housing at affordability levels is described in **Section 3.5 Population, Employment, and Housing**.

Exhibit 3.6-6. Countywide Planning Policies, Major Goals - Alternatives Evaluation

Topic Area	Relevant Overarching Policy	Evaluation
Land Use	**Policy Topic 1 Urban Growth Areas** Overarching summary: Growth in Spokane County will be encouraged in the UGAs, with lands in the UGAs developed with urban character and supported by urban services and facilities. Land outside UGA will remain rural or maintain its existing character, with jurisdictions working to protect natural resources lands, critical areas, and open spaces.	All alternatives would focus the majority of future growth in Downtown Spokane and in centers and corridors. Alternative 1 focuses growth in Downtown and in centers and corridors. Job growth is focused Downtown and in West Plains. Alternative 2 focuses growth along mixed-use TOD development along frequent transit corridors, with more neighborhood commercial zoning. Alternative 3 focuses growth Downtown and in Regional Hubs. Job growth is in Major Hubs, such as City Center, University District, and West Plains. The Preferred Alternative provides for growth in hubs like Downtown, West Hills, and the Hillyard area and frequent transit corridors across the city, blending features of Alternatives 2 and 3. See **Section 3.5 Population, Employment, and Housing** for further analysis on growth distribution in the city.

Topic Area	Relevant Overarching Policy	Evaluation
Public Services / Utilities	**Policy Topic 3. Provision of Urban Services** Overarching summary: Urban development will be distributed to promote land efficiency and in coordination with public facilities and utilities.	All alternatives would allow for growth that increases demand for public services. The City and municipal providers regularly plan for capital facilities to meet current and projected need. See Section **3.8 Public Services** and **Section 3.9 Utilities.**
Public Services	**Policy Topic 4 Parks and Open Space** Overarching summary: Jurisdictions in Spokane County will identify and protect open space lands, natural areas, and environmental corridors; develop and retain parks and open space; and recognize open space and recreation opportunities.	All alternatives would focus redevelopment in the ~~UGA~~ city limits and in concentrated locations, increasing the opportunity to identify and protect open space and natural lands outside of these development areas. The City also regularly plans for parks and recreation to meet current and projected need. See **3.8 Public Services**.
Transportation	**Policy Topic 5 Transportation** Overarching summary: Jurisdictions in Spokane County will coordinate with regional transportation planning (SRTC and STA) to ensure transportation and land use compatibility, including the adoption of LOS standards, the designation of specific transportation corridors to support high-capacity transportation, and coordination and support of existing or new multimodal transportation systems.	Each alternative would place most growth around transit investments. The action alternatives provide for new multimodal LOS and improved accessibility for multiple travel modes. Alternative 2 intensifies mixed-uses and housing growth along corridors and frequent transit routes. Alternative 3 focuses growth in Center City, along corridors, and with connections to regional centers. The Preferred Alternative provides for growth in hubs and frequent transit corridors across the city, blending features of Alternatives 2 and 3. See Section **3.7 Transportation** for a discussion on how the alternatives relate to transportation investment.
Housing	**Policy Topic 7. Affordable Housing** Overarching summary: Communities in Spokane County will accommodate a wide variety of development and	All alternatives meet total housing growth targets; however, only Alternative 2 and 3 and the Preferred Alternative have sufficient capacity to

Topic Area	Relevant Overarching Policy	Evaluation
	housing types, with consistency in development regulations and standards within UGAs. It includes coordination of housing, transportation, and economic development strategies to ensure land and densities for affordable housing are in locations accessible to employment centers.	provide housing at all income levels, particularly 0-80% AMI. See **Section 3.5 Population, Employment, and Housing** for a discussion on how the alternatives impact housing.
Economy / Climate	**Policy Topic 8 Economic Development** Overarching summary: Regional economic development will include cooperation between the private sector and government, the need to maintain downtowns as retail and cultural hubs, and the need to adopt a regional approach to environmental issues (water and air quality).	All alternatives would accommodate greater jobs and would promote economic opportunity in the city and region. There are no regionally designated jobs targets. Alternative 3 has the highest job growth projections and Alternative 2 has the lowest job growth projections. Alternative 1 and the Preferred Alternative assume job growth consistent with the SRTC regional transportation model for the period through 2046. Alternative 2 supports existing job centers but supports neighborhood commercial retail nodes. Alternative 3 focuses jobs in Center City, University District, and West Plains. See **Section 3.5 Population, Employment, and Housing** for further discussion on job growth and analysis. Regarding climate, Alternatives 2 and 3 and the Preferred Alternative include new climate policies focused on reducing emissions from buildings and transportation and making the city more capable of withstanding the impacts of climate change. These policies are not included in Alternative 1.

SRTC Metropolitan Transportation Plan

The SRTC Metropolitan Transportation Plan policies and consistency with the alternatives are evaluated in **Exhibit 3.6-7**. Highlights are described below.

Exhibit 3.6-7. SRTC Metropolitan Transportation Plan - Alternatives Evaluation

Topic Area	Relevant Overarching Policy	Evaluation
Economic Vitality	Promotes economic vitality and prioritizes transportation investment.	Alternative 1 concentrates housing growth throughout the city but with intense concentrations on the fringes of the city. It supports some existing transit routes investments in Northwest Spokane and in Center City. Alternative 2 intensifies growth in mixed-use areas along frequent transit routes and corridors, and includes planned TOD improvement areas, which helps concentrate transportation investment. Alternative 3 focuses investment in areas with transportation investments that help improve connections to hubs. However, it requires the greatest investment in transit and transportation. It also promotes mixed-use development and neighborhood commercial, which contributes to economic vitality, particularly in Center City and regional hubs. The Preferred Alternative provides for growth in hubs like Downtown, West Hills, and the Hillyard area and frequent transit corridors across the city, blending features of Alternatives 2 and 3.
Stewardship	Protects the environment and minimizes impacts from transportation	Alternative 1 has intense levels of growth in West Plains, Center City, and Northeast Spokane specifically the

Topic Area	Relevant Overarching Policy	Evaluation
		Hillyard and Chief Garry neighborhoods. Alternative 2 intensifies growth in mixed-use areas, which helps increase land use efficiency and reduce sprawl, which helps minimize impacts on the environment from transportation. Alternative 3 intensifies growth along key transportation connections between regional centers and promotes multimodal levels of service, minimizing the transportation impacts to the environment. The Preferred Alternative provides for growth in hubs and frequent transit corridors across the city, blending features of Alternatives 2 and 3.
Quality of Life	Improves choice and mobility	Alternatives 2 and 3 and the Preferred Alternative provide for a new multimodal LOS and improve accessibility for multiple modes of transportation. See **Section 3.7 Transportation** for further discussion on transportation accessibility.

THRIVE Spokane – Comprehensive Economic Development Strategy Plan

The THRIVE Spokane Comprehensive Economic Development Strategy Plan goals and consistency with the alternatives are evaluated in **Exhibit 3.6-8**. Highlights are described below.

Exhibit 3.6-8 THRIVE Spokane – Alternatives Evaluation

Topic Area	Relevant Overarching Strategies and Actions	Evaluation
Recovery and Resilience	Targets efforts that prepare the region to avoid, withstand, and recover from economic shocks and natural disasters.	All alternatives would focus the majority of future growth in Downtown Spokane and in centers and corridors Alternative 1 concentrates housing

Topic Area	Relevant Overarching Strategies and Actions	Evaluation
		growth in Downtown and in centers and corridors. It supports some existing transit routes investments in Northwest Spokane and in Center City. Alternative 2 focuses growth along mixed-use TOD development along frequent transit corridors, with planned TOD improvement areas. Alternative 3 focuses growth in Center City and in regional hubs. It also promotes mixed-use development and neighborhood commercial, which contributes to economic vitality and resiliency, particularly in Center City. The Preferred Alternative provides for growth in hubs like Center City and frequent transit corridors across the city, blending features of Alternatives 2 and 3. See **Section 3.5 Population, Employment, and Housing** for further analysis on growth distribution in the city.
Competitiveness	Positions the region as a strong competitor to attract talent, capital, and resources for strategic economic development.	All alternatives would accommodate greater jobs and promote economic opportunity in the city and region. Alternative 1 and the Preferred Alternative ~~has~~ have intense levels of growth in West Plains, Center City, and Northeast Spokane specifically the Hillyard and Chief Garry neighborhoods. Alternative 2 intensifies growth in mixed-use areas, which helps support investment in mixed-use projects and connects workers with growth employment centers.

Topic Area	Relevant Overarching Strategies and Actions	Evaluation
		Alternative 3 intensifies job growth in Center City, University District, and West Plains, supporting economic agglomeration to attract capital and resources. It also places capacity for housing growth for all income levels on key transportation corridors to support the connection of workers with employment centers.
Equitable Growth	Seeks to understand, address, and dismantle outcome disparity	All alternatives would support growth. Alternatives 2 and 3 and the Preferred Alternative support TOD development and increase mixed-use development.
Connectivity	Promotes the interconnectedness of Greater Spokane and drives cross-sector partnerships to align efforts that advance economic opportunity for all.	All alternatives have growth in well-connected opportunity areas of Spokane. Alternative 2 prioritizes TOD development and growth along corridors and frequent transit routes. Alternative 3 establishes the highest jobs allocation with focused investment in areas with planned transportation investments.

Area Specific Evaluation

Northwest Spokane

All alternatives have concentrated growth in Northwest Spokane, in the neighborhoods of North Indian Trail, Emerson / Garfield, Northwest, and North Hill. Overall, the alternatives support the key objectives of the neighborhood plans. See **Exhibit 3.6-9** for an evaluation of consistency of the alternatives with neighborhood planning efforts.

Exhibit 3.6-9. Alternatives Consistency with Northwest Spokane Neighborhood Plans

Neighborhood / Action Plan	Alternative 1	Alternative 2	Alternative 3	Preferred
Emerson-Garfield	●	●	●+	●+
Five Mile Prairie	●	●	●	●

Neighborhood / Action Plan	Alternative 1	Alternative 2	Alternative 3	Preferred
North Hill	●	●+	●+	●+
Northwest & Audubon / Shadle Area	●+	●	●+	●+
West Central	●+	●	●	●+

Legend: ○ = does not support or partially supports ●=supports ●+ = optimally supports
NOTE: The Preferred Alternative was added to the figure above with the Final EIS.

Neighborhood Planning Efforts

- **Emerson-Garfield:** Alternatives 2 and 3 and the Preferred Alternative promote higher housing growth in the Emerson-Garfield neighborhood, which supports its neighborhood action plan goals to have strong residential areas. However, Alternative 1 does have some growth, particularly closer to Center City. Alternatives 1 and 3 along with the Preferred Alternative have more job growth in this neighborhood than Alternative 2, which supports the neighborhood action plan to build a vibrant business district.
- **Five Mile Prairie:** The neighborhood action plan focuses on transportation connectivity and improvements, and it identifies as a low-density residential neighborhood. Alternative 1 concentrates housing growth in the neighborhood, which may result in changes to the neighborhood action plan. Alternatives 2 and 3 and the Preferred Alternative focus less housing and job growth in this neighborhood.
- **North Hill:** Alternatives 2 and 3 and the Preferred Alternative anticipate more housing and job growth in the North Hill neighborhood than Alternative 1. This anticipated growth will help support the neighborhood's vision to create a vibrant, higher intensity area.
- **Northwest & Audubon / Downriver:** Alternatives 1 and 3 and the Preferred Alternative have concentrations of housing and job growth in the Shadle Area of this neighborhood, which support the Shadle Area Neighborhood Plan to encourage mixed-use growth and diverse housing options. Alternative 2 focuses job growth in the Shadle Area; however, much of its housing growth is anticipated along the northern border of the neighborhood.
- **West Central:** The neighborhood action plan promotes attracting commercial and light industrial investment while maintaining single unit residential. Alternative 1 and the Preferred Alternative forecast~~s~~ lower housing growth concentrations in the neighborhood than Alternatives 2 and 3, so it may be more supportive of the neighborhood plan's overall goals. Regarding job growth, Alternatives 1 and 3 and the Preferred Alternative anticipate higher concentrations of job growth in the neighborhood than Alternative 2; however, all alternatives are anticipated to attract economic investment.

Northeast Spokane

All alternatives have concentrated growth in Northeast Spokane that varies by alternative. Overall, the alternatives support the key objectives of the neighborhood plans. See **Exhibit 3.6-10** for an evaluation of consistency of the alternatives with adopted plans and neighborhood planning efforts.

Exhibit 3.6-10. Alternatives Consistency with Northeast Spokane Neighborhood Plans

Neighborhood Plan	Alternative 1	Alternative 2	Alternative 3	Preferred
Subarea and TOD Plans*				
Hillyard Subarea Plan	●	●	●+	●
South Logan TOD Plan	○**	●+	●+	●+
Neighborhood Planning Efforts				
Bemiss, Hillyard, and Whitman	●	●	●	●
Chief Garry Park	●	●+	●+	●+
East Central	●	●	●	●
Nevada-Lidgerwood	●	●	●	●

Legend: ○ = does not support or partially supports ●=supports ●+ = optimally supports
*The 5th Avenue Plan is ongoing at the time of this writing and is not included in the chart. The action alternatives include key concepts from the planning efforts to date including potential land use and growth.
** Alternative 1 has some housing and job growth in the Logan neighborhood, but it is limited and does not reflect the South Logan TOD Plan since No Action was based on the Comprehensive Plan in place as of the 2022 base year.
NOTE: The Preferred Alternative was added to the figure above with the Final EIS.

Hillyard Subarea Plan

All alternatives have concentrations of housing and job growth in the Hillyard neighborhood. Alternatives 2 and 3 and the Preferred Alternative have high concentrations of housing growth in the Hillyard Business District, which aligns with the Hillyard Subarea Plan's vision to build upon assets and promote mixed-use development in this district. Alternatives 1 and 3 and the Preferred Alternative also have concentrations of job growth throughout The Yard in the Hillyard Subarea, which aligns with the Subarea Plan's goal to evolve The Yard into a diverse employment center. All three alternatives have concentrated residential growth in the Beacon Hill area in the southeast corner of the Hillyard Subarea, which aligns with future redevelopment in this area.

South Logan TOD Plan and Logan Neighborhood Plan

Alternatives 2 and 3 and the Preferred Alternative have high concentrations of housing and job growth in the South Logan neighborhood. The concentration of growth supports the South Logan TOD Plan, adopted by resolution in 2023, which focuses on expanding housing options and affordability and drawing in business investment and residents. In comparison, Alternative 1 has some housing and job growth in the Logan neighborhood, but it is limited and does not reflect the South Logan TOD Plan since No Action was based on the Comprehensive Plan in place as of the 2022 base year. The action alternatives also support TOD concepts developed in the Transit Oriented Development Framework Study, adopted by resolution, which emphasized transit-supportive, mixed-use growth at Bus Rapid Transit station areas in the Chief Garry Park neighborhood along Mission Avenue and near Spokane Community College.

Other Neighborhood Planning Efforts

- **Bemiss, Hillyard, and Whitman:** All ~~three~~ studied alternatives focus job growth in the Hillyard neighborhood and part of the Bemiss neighborhood. Alternatives 2 and 3 and the Preferred Alternative ~~both~~ focus housing growth along corridors in the Hillyard neighborhood; Alternative 1 focuses housing growth throughout these three neighborhoods, with housing concentrations on the east border of Hillyard. Alternatives 2 and 3 and the Preferred Alternative align housing and job growth with existing transportation connections to help enhance livability, a core goal of the neighborhood plan.
- **Chief Garry Park Neighborhood:** All ~~three~~ studied alternatives focus housing growth in the northwest corner of the neighborhood, which aligns with the neighborhood plan's focus areas for growth. ~~Both~~ Alternatives 2 and 3 and the Preferred Alternative encourage moderate increases in housing density throughout the area, which aligns with the neighborhood plan to help maintain affordability. Job growth in all ~~three~~ studied alternatives is focused on the southern half of the neighborhood.
- **East Central Neighborhood:** While the existing neighborhood plan focuses primarily on improvements to the Ben Burr Trailhead, overall neighborhood goals include connectivity. All alternatives add housing and job growth to East Central. Alternatives 2 and 3 and the Preferred Alternative add more housing growth than Alternative 1, which helps promote connectivity to Center City. All alternatives add concentrated job growth in the neighborhood.
- **Nevada Lidgerwood:** Neighborhood planning efforts focus on non-motorized travel safety and helping to reduce traffic volumes and speed. All alternatives focus job growth in the northwest corner of the neighborhood. Alternatives 2 and 3 and the Preferred Alternative focus housing growth along Division Street, while Alternative 1 has housing growth in less concentrated amounts throughout the neighborhood.

Division Corridor

Alternatives 2 and 3 and the Preferred Alternative focus mixed-use and commercial growth along the Division Corridor, as well as moderate and high residential density. This aligns with strategies and priorities recommended in the DivisionConnects Phase 1 and Phase 2 study, which includes

development of transit-supportive strategies including supportive land uses along the corridor, such as mixed-use, commercial, and higher intensity residential. This also aligns with ongoing planning efforts in the Division Street TOD Plan, which models transit-supportive growth and mixed-use development at Rowan and Francis Bus Rapid Transit station areas and in the southern portion of the Division-Ruby couplet.

Alternative 1 primarily concentrates growth in the Division Corridor where it overlaps with the Center City study area (e.g., near University District, Medical District, and the Downtown Center).

Center City

All alternatives have concentrated job and housing growth in Center City, with Alternatives 2 and 3 and the Preferred Alternative promoting denser concentration of housing growth than Alternative 1. Overall, the alternatives support the adopted plans' key objectives. See **Exhibit 3.6-11** for an evaluation of consistency of the alternatives with adopted plans and neighborhood planning efforts.

Exhibit 3.6-11. Alternatives Consistency with Center City Spokane Neighborhood Plans

Neighborhood Plan	Alternative 1	Alternative 2	Alternative 3	Preferred
Adopted Plans				
Spokane Downtown Plan	●	●+	●+	●+
South University District Subarea Plan	●	●+	●+	●+

Legend: ○ = does not support or partially supports ●=supports ●+ = optimally supports
NOTE: The Preferred Alternative was added to the figure above with the Final EIS.

Spokane Downtown Plan

All alternatives place housing and job growth in Downtown Spokane, which supports the overall vision of the Downtown Plan. Alternative 2, and particularly Alternative 3 and the Preferred Alternative, focus higher concentrations of housing in the Center City and Downtown area than Alternative 1. Higher densities of housing in this area support the Plan's vision to promote higher density residential with a range of housing options and mixed-use development. Regarding job development, Alternative 3 places higher job growth in Center City, which supports the Downtown Plan vision to build upon its emerging activity centers and promote mixed-use development.

South University District Subarea Plan

Compared to Alternative 1, Alternatives 2 and 3 and the Preferred Alternative place higher concentrations of housing and job density in this area which supports the subarea plan's vision of a lively mixed-use urban village design of residential, retail, institutional, and artisan/light industrial uses.

Alternative 3 and the Preferred Alternative in particular would provide more housing and jobs than other alternatives.

South Spokane

All alternatives have concentrated job and housing growth along corridors and nodes in South Spokane, and on vacant land in the Grandview and Latah neighborhoods. See **Exhibit 3.6-12** for an evaluation of consistency of the alternatives with neighborhood planning efforts.

Exhibit 3.6-12. Alternatives Consistency with South Spokane Neighborhood Plans

Neighborhood Plan	Alternative 1	Alternative 2	Alternative 3	Preferred
Neighborhood Planning Efforts				
Grandview / Thorpe	●	●	●	●
Peaceful Valley	●	●	●	●
South Hills Coalition	●	●	●	●

Does not include Browne's Addition; that neighborhood plan is focused on a master park plan.
Legend: ○ = does not support or partially supports ●=supports ●+ = optimally supports
NOTE: The Preferred Alternative was added to the figure above with the Final EIS.

Neighborhood Planning Efforts

- **Grandview / Thorpe:** The neighborhood action plan prioritized establishing a neighborhood activity center or small-scale retail node. All alternatives anticipate a similar level of housing and job growth.
- **Peaceful Valley:** The neighborhood action plan focuses on community connectivity, walkability, and traffic safety. All alternatives place similar levels of growth and support these objectives.
- **South Hill Coalition:** The neighborhood coalition plan focuses on connectivity, enhancing livability, and fostering a cohesive and vibrant South Hill. The alternatives support these neighborhood objectives, with all alternatives placing housing growth in focused concentrations in Southgate, Lincoln Heights, and Rockwood neighborhoods. Alternative 3 and the Preferred Alternative also places higher concentrations of housing growth in Cliff Cannon than Alternatives 1 and 2. Job growth follows similar geographic concentrations across all alternatives, with job growth in Lincoln Heights, Southgate, and Cliff Cannon. Alternative 3 shows higher concentrations of job growth in South Hill neighborhoods closer to the Center City core in the medical district. All alternatives show similar levels of support for these plan objectives and are anticipated to contribute to livability and cohesiveness in the South Hill area.

West Plains

The West Plains Subarea Transportation Management Plan focuses on promoting a balanced mix of land uses to support efficient use of the transportation system. All alternatives promote similar concentrations of job growth in the West Plains neighborhood. Regarding housing growth, Alternative 1 has concentrations of housing growth in the West Plains neighborhood, near the Grandview / Thorpe and Latah neighborhoods. Alternatives 2 and 3 and the Preferred Alternative anticipate lower levels of concentrated growth in this area. The anticipated housing and job growth concentrations in West Plains support the overall goal to balance land uses in this neighborhood.

Comparison of Impacts

Environmental Justice Implications

Climate Resilience and Greenhouse Gas Reduction Policies

Alternatives 2 and 3 and the Preferred Alternative will add climate planning, which include new climate resilience and greenhouse gas reduction goals and policies per HB 1181. In comparison, Alternative 1 No Action continues current natural environment policies and critical areas regulation, but these were not designed to meet the new HB 1181 requirements in full.

Without these climate resilience goals and policies, Alternative 1 may increase vulnerability for overburdened communities in the city. These community members often have fewer resources and may face greater harm should they be impacted by extreme weather (e.g., extreme heat, wildfire smoke). Alternative 1 may also place disproportional health impacts on vulnerable populations (e.g., children, seniors, and people with preexisting health conditions) affected by increased exposure to air pollution, heat, and other climate-related hazards. Furthermore, it may deepen disparities among community members with adaptive capacity and more vulnerable community members without these resources.

Alternatives 2 and 3 and the Preferred Alternative add climate planning, which increases goals and policies in climate resilience and greenhouse gas emission reduction. Possible effects include prioritizing improvements to vulnerable communities to increase resilience (e.g., tree planting, cooling centers), equity integrated in climate planning to increase recovery capacity should an extreme weather event occur, and targeted greenhouse gas emission strategies to help improve local air quality in communities located near traffic or industrial use.

Alternative 1: No Action, Stay the Course

Alternative 1 No Action would meet GMA goals regarding urban growth served by transportation and urban services. It would not meet new GMA requirements to amend the Housing Element to address new requirements in HB1220 regarding housing opportunities by income band. While it has enough land capacity to accommodate housing and job growth targets, it does not have enough capacity to accommodate housing targets at all income levels, specifically housing for those with incomes at 0-

80% of AMI. Alternative 1 No Action also does not meet HB 1181 requirements to include new climate resilience and greenhouse gas reduction goals and policies.

Regarding regional planning policies, Alternative 1 meets CPPs related to focusing growth in the urban area that is coordinated with urban services. It also generally supports regional coordination efforts related to transportation and economic development. While the City has existing multimodal transportation level of service standards, Alternative 1 does not update its multimodal transportation level of service to adopt VMT and GHG reduction goals for transportation. Alternative 1 also does not meet capacity for affordability housing targets and does not include climate policies that could help address environmental issues related to air quality. Alternative 1 is also generally supportive of policies in the SRTC Horizon 2045 Metropolitan Transportation Plan and THRIVE Spokane.

Regarding local planning efforts, Alternative 1 is generally supportive of local neighborhood plans' objectives but assumes a growth strategy before the completion of the South Logan TOD Plan and the DivisionConnects corridor strategy. See **Impacts Common to All Alternatives** for more details.

Alternative 2: Distributed and Balanced

Alternative 2 would be consistent with state and regional goals. Similar to Alternative 1, it would meet GMA goals regarding urban growth served by transportation and urban services. Unlike Alternative 1, it would meet new GMA requirements to update the Housing Element in the Comprehensive Plan to address new requirements in HB1220 regarding housing opportunities by income band. It has enough capacity to accommodate housing targets at all income levels. Alternative 2 includes climate planning, with goals and policies that are consistent with HB 1181. It would also update the critical areas regulations.

Regarding regional planning policies, Alternative 2 meets CPPs, including focused growth in the urban area and the provision of urban services. It concentrates growth along frequent transit routes and corridors to support regional transportation planning investments. It also provides for an updated multimodal LOS that adopts VMT and GHG reduction goals. In addition, it supports improved mobility and accessibility efforts for multiple travel modes due to its concentration of housing and job growth. Similarly, Alternative 2 is supportive of regional transportation planning policies and THRIVE Spokane, due to its concentration of growth along frequent transit routes and corridors. The jobs/housing balance in concentrated areas of the city that aligns with transportation investment helps support mixed-use and TOD improvements, and aligns with regional economic goals around recovery, resiliency, equitable growth, and connectivity.

Regarding local planning efforts, Alternative 2 supports or optimally supports local neighborhood plans. See **Impacts Common to All Alternatives** for more details. Below is an evaluation of how Alternative 2 supports adopted projects and subarea plans incorporated in the City's Comprehensive Plan and/or municipal code.

Northeast Spokane

Alternative 2 concentrates housing and job growth in the Logan neighborhood, which supports the goals and objectives in the South Logan TOD Project and Plan. It aligns with land use and zoning changes to support a mixed-use corridor along Hamilton Street and aligns with TOD investments in this neighborhood. It also has concentrations of housing growth and promotes mixed-use development in the Hillyard neighborhood, aligning with the Hillyard Subarea Plan's vision.

Division Corridor

Alternative 2 adds greater housing and job intensity along frequent transit routes, with mixed-use, commercial, and higher density residential along Division Street. This aligns with the DivisionConnects Phase 2 study and Division Street TOD Plan, which models transit-supportive growth and mixed-use development at Rowan and Francis Bus Rapid Transit station areas and in the southern portion of the Division-Ruby couplet.

Center City

Alternative 2 focuses high concentrations of housing and job growth in the Center City, including Downtown and the South University District. These higher concentrations of growth align with the Spokane Downtown Plan to promote higher density residential growth and mixed-use development and with the South University District Subarea Plan to have higher concentrations of housing and job growth to support a lively mixed-use urban village.

Alternative 3: Center City and Regional Hubs

Impacts under Alternative 3 are similar to those described under Alternative 2. The alternative concentrates jobs and housing growth in regional hubs with connections to the Center City and North Spokane corridor in the Hillyard area and includes the planned growth in the 5th Avenue Corridor on the southern end of the corridor. Alternative 3 has the highest jobs allocation, with focused investment in key employment centers, which supports locally adopted projects and subarea plans, including the Spokane Downtown Plan, the South University District Subarea Plan, the South Logan TOD Plan, and the Hillyard Subarea Plan. These Plans support increased business and commercial investment, the promotion of mixed-use development, and lively centers, which will be supported through the concentrated residential and job growth in Alternative 3.

Preferred Alternative

NOTE: *Analysis for the Preferred Alternative was added below with the Final EIS.*

Impacts under the Preferred Alternative are similar to those described under Alternatives 2 and 3. The Preferred Alternative concentrates jobs and housing growth in regional hubs with connections to the Center City and North Spokane corridor in the Hillyard area and includes the planned growth in the 5th Avenue Corridor on the southern end of the corridor. It also emphasizes mixed use corridors along

frequent transit routes. It assumes housing growth that supports the Spokane Downtown Plan, the South University District Subarea Plan, the South Logan TOD Plan, and the Hillyard Subarea Plan.

The Preferred Alternative is also generally supportive of policies in the SRTC Horizon 2045 Metropolitan Transportation Plan as it has the employment growth in alignment with that plan similar to Alternative 1.

Maximum Development Scenarios

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

Under either the No Action Alternative or Preferred Alternative, growth accelerated to the maximum potential development per land capacity would be greater than the OFM most likely projection allocated between Spokane County and its cities for the 2020-2046 period. If growth were to accelerate to this level, which is unlikely, the City would be able review trends and adjust its plan.

OFM updates its 20-year projections every 5 years and the City will monitor growth every five years and update the Comprehensive Plan every 10 years (RCW 36.70a.130). The City can annually adjust the plan through a docket process.

3.6.3 Mitigation Measures

Incorporated Plan Features

Features of the alternatives that help increase policy and plan consistency include:

- Alternatives 2 and 3 and the Preferred Alternative meet housing targets at all income levels to address state housing requirements in HB 1220.
- Alternatives 2 and 3 and the Preferred Alternative include climate planning goals and policies in the Comprehensive Plan to implement state requirements of HB 1181 to have a Climate Element.

Regulations and Commitments

As required by GMA, the City must submit proposed Comprehensive Plan amendments and updated regulations for review and comment by the State prior to final adoption.

Other Potential Mitigation Measures

~~When a~~The Preferred Alternative ~~is developed, it should be~~has been evaluated for conformity to state and regional plans and policies. This ~~may include reallocating~~includes adjustments to growth assumptions in certain areas while still being in the range of the studied alternatives.

3.6.4 Significant Unavoidable Adverse Impacts

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

3.7 Transportation

This section describes citywide existing transportation conditions in the City of Spokane, establishing a baseline for evaluating potential future performance of the growth alternatives presented in Chapter 2 of the Draft Environmental Impact Statement (DEIS). This section provides an inventory of existing pedestrian, bicycle, transit, vehicle, and freight networks, documents overall safety conditions, and assesses mobility, access, and equity across the city.

The transportation existing conditions baseline reflects available data and adopted plans, including Spokane's Pedestrian and Bicycle Master Plans, and supports analysis of how each alternative could affect travel behavior, infrastructure performance, and user experience. This chapter also identifies key metrics and evaluation criteria used to assess impacts and potential mitigation measures, consistent with the overarching goals of PlanSpokane 2046.

Study Area

The City of Spokane is Washington State's second largest city and covers an area of approximately 69 square miles. The primary transportation study area is within the City's limits; connections to neighboring jurisdictions are also considered to reflect regional travel patterns. For a citywide description of the EIS alternatives and study area, see Chapter 2 (Proposal and Alternatives). A map of the City's limits, urban growth areas, and neighborhoods is available in **Section 2.1.3 Study Area**.

Data and Methods

This analysis evaluates the potential transportation impacts of the Spokane Comprehensive Plan growth alternatives using a combination of citywide datasets, regional planning tools, and multimodal performance measures.

The transportation analysis provides a citywide, programmatic assessment of how growth alternatives would affect travel behavior, congestion, and multimodal network performance. Rather than evaluating individual projects, the methods are designed to compare how overall land use affect system-level travel and access to mobility options.

A set of qualitative and quantitative metrics is utilized to compare how each alternative affects conditions for people walking, bicycling, taking transit, and driving. Results are summarized at both the citywide and subarea levels to capture variations in land use and travel patterns.

For the Vehicle Network and State Facilities, quantitative metrics are used to measure performance. These metrics are defined below.

Intersection Level of Service (LOS)

Intersection LOS is a qualitative measure used to evaluate traffic operations and delay at signalized and unsignalized intersections. It is defined in the Highway Capacity Manual (HCM) and widely used by

transportation agencies across the U.S., including WSDOT and the Spokane Regional Transportation Council (SRTC). LOS is expressed as a letter grade from A to F, representing the average delay experienced by vehicles during peak conditions.

LOS Letter Grades:

- **LOS A**: Free flow: Little to no delay (≤10 seconds); high comfort and freedom of movement.
- **LOS B**: Stable flow: Slight delay (10–20 seconds); minor restriction to maneuverability.
- **LOS C**: Stable flow with more delay: Moderate delay (20–35 seconds); acceptable performance in urban areas.
- **LOS D**: Approaching unstable flow: Noticeable delays (35–55 seconds); common threshold for acceptable performance in cities like Spokane.
- **LOS E**: Unstable flow with significant delays: High delay (55–80 seconds); nearing capacity with poor progression.
- **LOS F**: Forced or breakdown flow: Very high delay (>80 seconds); over-saturated conditions, often resulting in queuing and driver frustration.

Volume-to-Capacity Ratio (v/c) Summary

The volume-to-capacity ratio (v/c) is a performance metric used to assess how efficiently a roadway or intersection is operating. It compares the actual traffic volume using a facility to its maximum carrying capacity:

v/c = traffic volume ÷ roadway capacity

A v/c ratio < 1.0 indicates that demand is within the available capacity.

A v/c ratio = 1.0 suggests the facility is operating at capacity.

A v/c ratio > 1.0 means demand exceeds capacity, often resulting in congestion, delays, and queuing.

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

VMT per Capita and Mode Share

Vehicle-Miles-Traveled (VMT) per capita and mode share are travel-behavior indicators used to compare growth alternatives at a citywide, programmatic scale. VMT Per-capita measures driving by population, and mode share shows how trips are distributed across drive alone (SOV), shared ride (HOV), transit, walk, and bike. These metrics are planning-scale indicators intended for relative comparison among land use patterns.

Results are derived from the SRTC regional travel demand model for the study years (2024 existing and 2046), with model post-processing consistent across all alternatives. Future funded projects and

service assumptions, such as the North Spokane Corridor and Division Street BRT, are constant across alternatives for comparability.

3.7.1 Affected Environment

This section describes the existing transportation network within the City of Spokane. The transportation network consists of pedestrian, bicycle, transit, and City and state-owned roadway facilities, serving general purpose and freight traffic.

Pedestrian Network

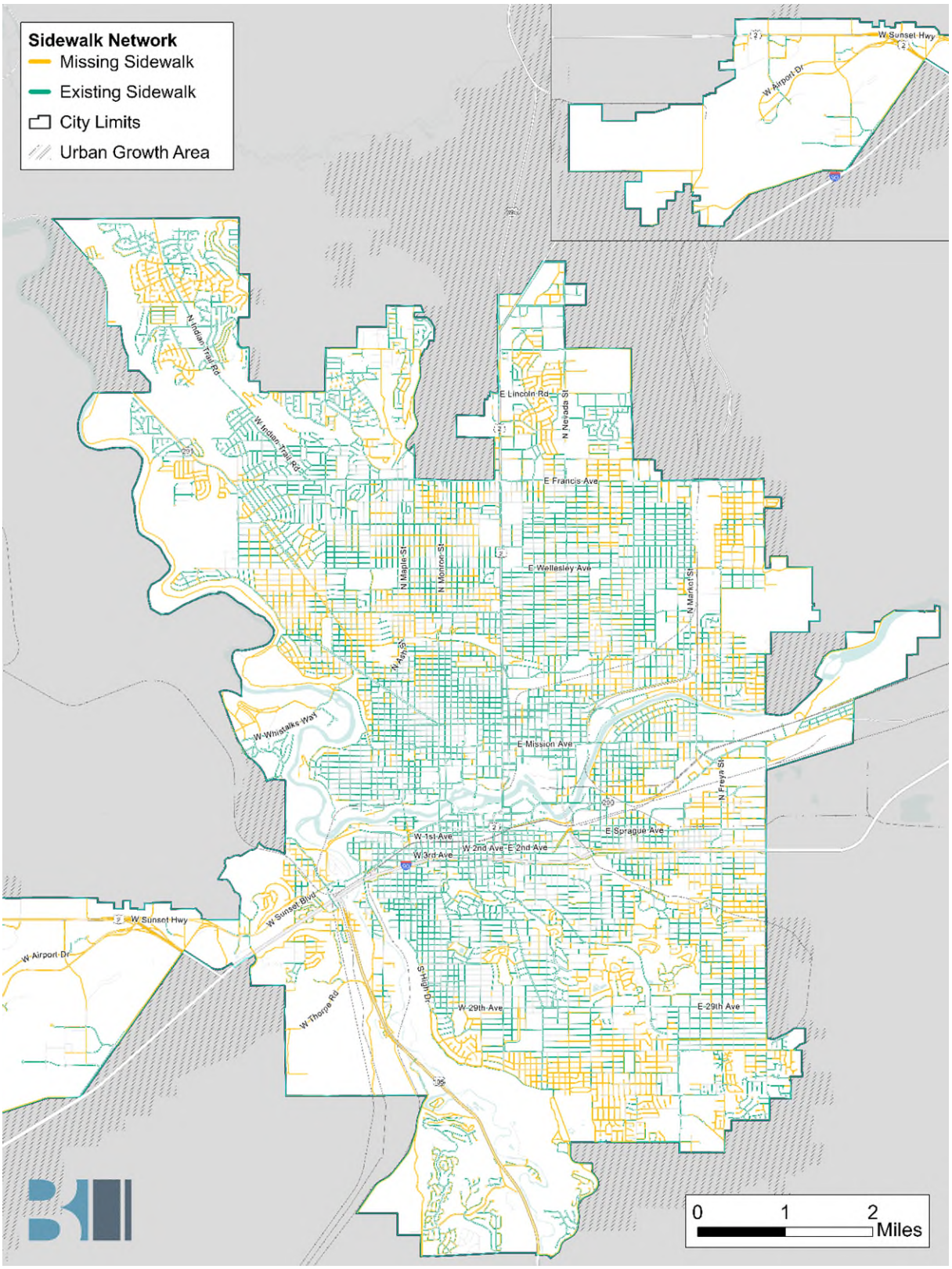
The City's pedestrian network consists of sidewalks, crosswalks, shared-use paths, neighborhood streets, and trails. The existing sidewalk network is mapped in **Exhibit 3.7-1**. Most major arterials have sidewalks on one or both sides of the road. However, there are considerable gaps in the sidewalk network in the West Plains and Northwest Spokane area and generally in the outer area of the City. Overall, north-south connectivity is also limited by the barriers of I-90 and SR 290 which have limited crossings and fewer adjacent sidewalks.

With the introduction of the 2015 Pedestrian Master Plan, the City of Spokane has worked to address gaps in the pedestrian network as a core element of its multi-modal transportation system alongside the implementation of its Complete Streets ordinance. These plans, in addition to the City's maintenance programs, ensure that the pedestrian network can be continually upgraded and maintained.

In addition, the 2015 Pedestrian Master Plan[1] established City Pedestrian Priority Zones, which are designated areas where the City will aim to invest in pedestrian infrastructure. These zones were chosen through an analysis of pedestrian demand and deficiencies and aim to enhance safety and walkability, particularly around schools, parks, and transit stops. These zones are spread throughout the city, and are periodically evaluated based on growth and pedestrian activity.

[1] City of Spokane, https://my.spokanecity.org/projects/pedestrian-master-plan/, 2015

Exhibit 3.7-1.Spokane Existing Pedestrian Facilities



Sources: City of Spokane, Fehr & Peers, 2025

Northwest Spokane

Sidewalk completeness generally improves closer to the City's core and activity nodes, while peripheral areas like Indian Trail and Five Mile Prairie have more gaps. Sidewalk infill continues on along the key diagonal connection of Driscoll Boulevard. Within Pedestrian Priority Zones, the City's plan highlights locations such as the Monroe Street Corridor, Cannon & Maxwell Center, and Shadel Center (Ash Street/Wellesley Avenue) for pedestrian access and safety improvements tied to centers and corridors.

Northeast Spokane

Northeast Spokane includes a mix of neighborhoods with uneven sidewalk coverage and more frequent gaps on the outskirts and along some local streets. Priority locations emphasize access along in centers and corridors such as the Five Mile Center (Division Street/Francis Avenue), the Hamilton Corridor, and the Market Street Corridor adjacent to the North Spokane Corridor. In the Hillyard neighborhood, sidewalks are less frequent on corridors, such as Wellesley Avenue and Freya Street, in the industrial and commercial areas east of the North Spokane Corridor (NSC).

Center City

Center City has the highest concentration of existing sidewalks in Spokane, with few missing segments. However, north-south pedestrian connectivity is occasionally constrained by geographic barriers such as the Spokane River and the BNSF railway. Key connectors that help bridge these obstacles include the Post Street Bridge in Downtown Spokane and the University District Gateway Bridge over the BNSF tracks. Most of the City's pedestrian priority zones are located within this subarea, reflecting its high pedestrian demand and infrastructure focus.

South Hill / South Spokane

In this subarea, sidewalk gaps are prevalent on the periphery of the city, which is largely related to the age of the neighborhood. The Pedestrian Master Plan identified several pedestrian priority zones adjacent to US 2, I-90, and in the Lincoln Heights neighborhood. These areas are prioritized for improvements to enhance walkability and safety.

West Plains

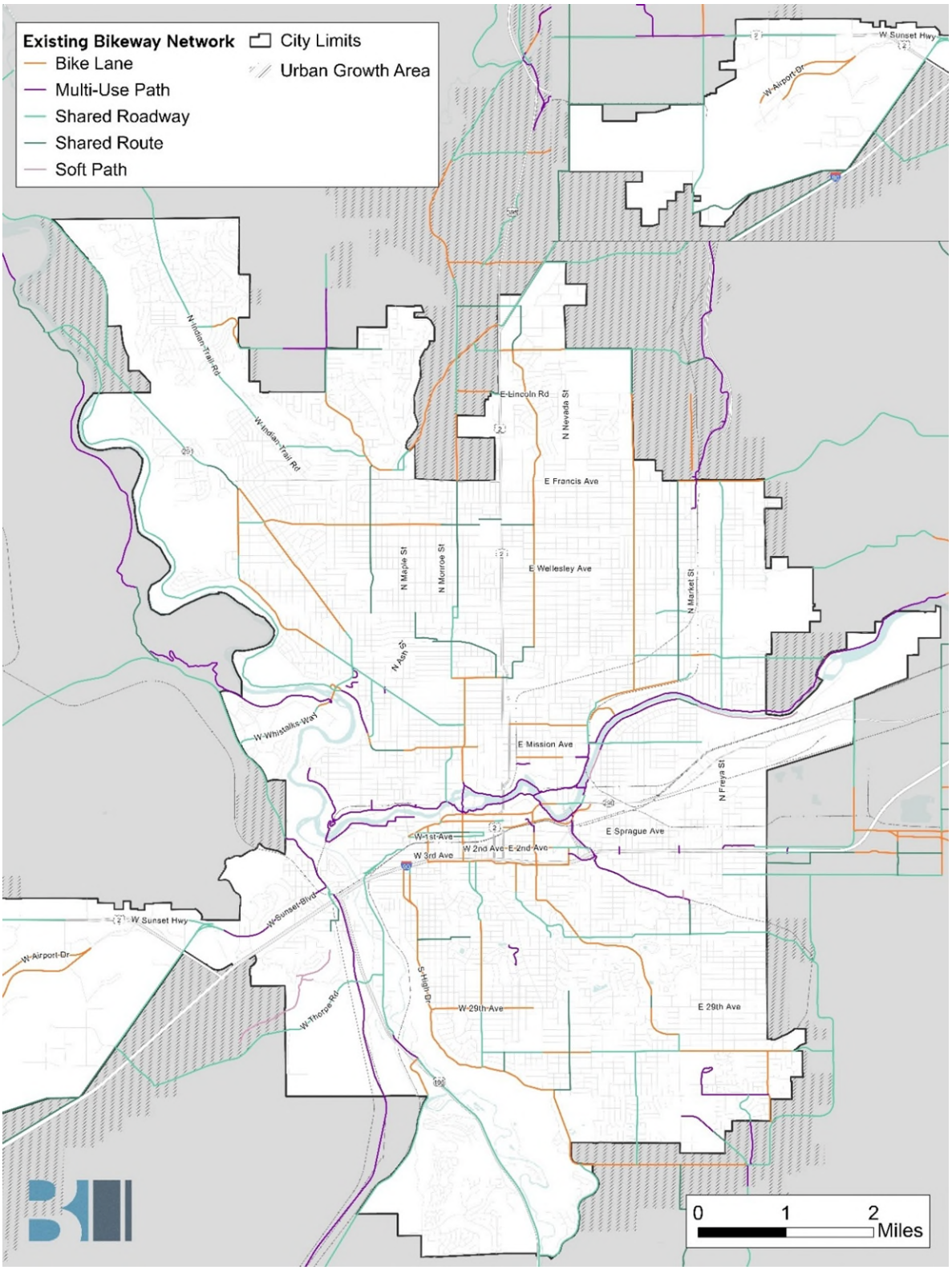
The West Plains subarea is predominantly industrial and lacks a comprehensive sidewalk network. Pedestrian access is constrained by proximity to major infrastructure such as the airport, US 2, I-90, and large industrial buildings. Notably, this is the only subarea in Spokane without any designated pedestrian priority zones under the Pedestrian Master Plan.

Bicycle Network

The bicycle network includes several facility types as designated in the City's 2017 Bicycle Master Plan. These bikeway types include Bike Lanes, Bike Friendly Routes, Neighborhood Greenways, Shared Use Paths, and Soft Surface Paths. In addition, the Bicycle Master Plan establishes a desired 2037 bicycle network, which would extend Spokane's bicycle network to roughly 400 miles.

Exhibit 3.7-2 shows the existing bicycle network in Spokane. The City's network primarily consists of bike friendly routes, bike lanes, and shared-use paths. Neighborhood greenways have been implemented along Cincinnati Street and are in progress in several other locations. There are also several soft-surface paths, mainly along the Spokane River and on the outskirts of the city.

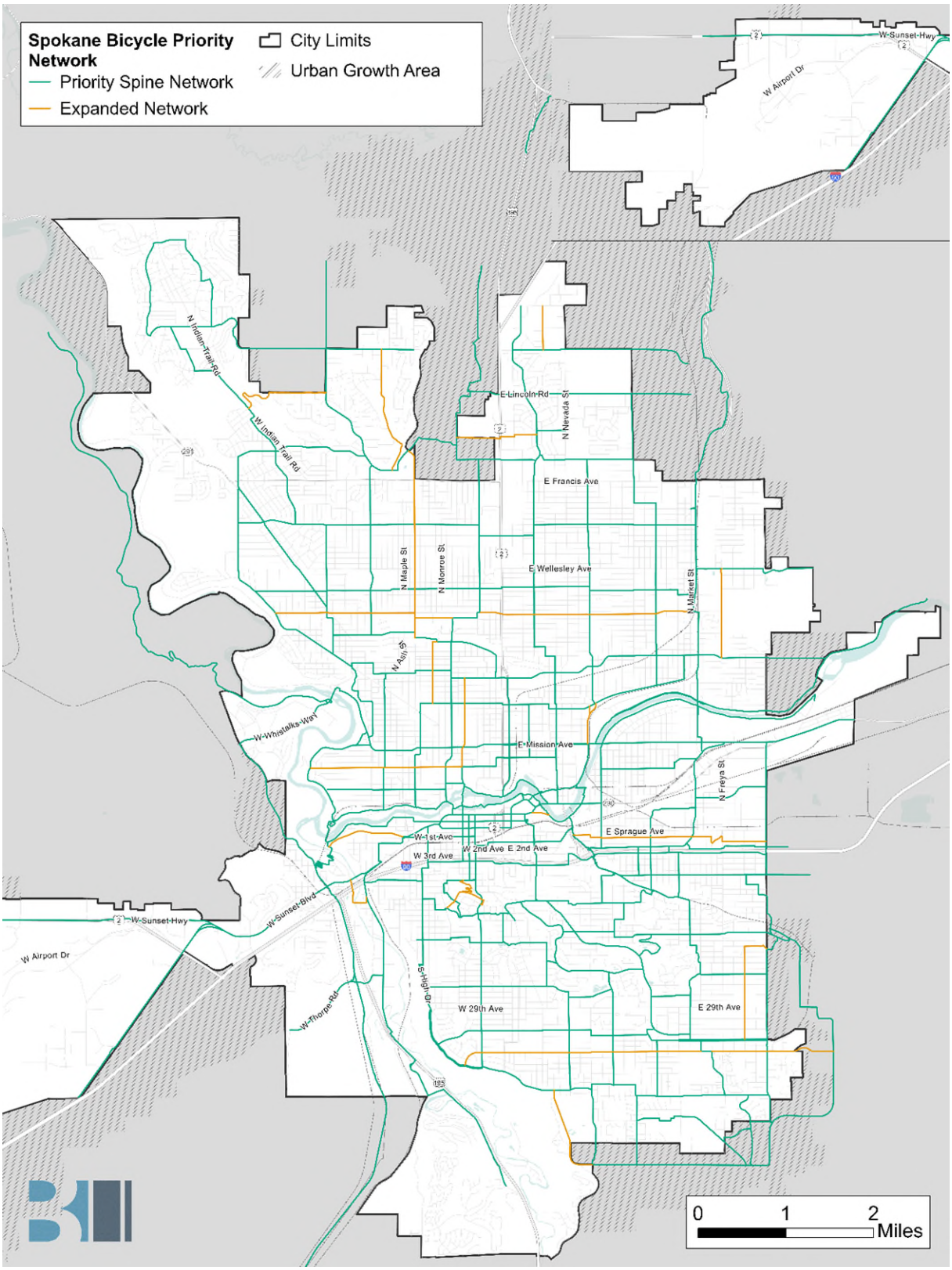
Exhibit 3.7-2. Spokane Existing Bicycle Network Facilities



Sources: Spokane Regional Transportation Council~~City of Spokane~~, Fehr & Peers, 2026~~5~~.
NOTE: The exhibit above was updated with the Final EIS.

The City's Bicycle Priority Network, mapped in 2024, (**Exhibit 3.7-3**) identifies a fully connected, all-ages-and-abilities set of priority bikeways that link neighborhoods to schools, parks, transit, jobs, and activity centers. The Bicycle Priority Network was assembled following an assessment based on objective criteria and with the input of community stakeholders to compose a network composed of a primary spine plus an Expanded Priority Network of important connections. The Bicycle Priority Network targets low-stress riding and aims for practical spacing of about 1/2 mile between parallel routes in most of the city and no more than 1 mile in less-dense areas. The Bicycle Priority Network is a planning network used to inform future bikeway implementation; not all priority routes have facilities today.

Exhibit 3.7-3. Spokane Bicycle Priority Map



Sources: City of Spokane, Fehr & Peers, 2025

Northwest Spokane

Northwest Spokane's bicycle network features the Spokane River Centennial Trail, which is a recreational and commuter spine linking neighborhoods to the Center City and Spokane Falls Community College. Recent projects are closing gaps, for example, the Maxwell Avenue (Pettet–Walnut) Bike/Pedestrian Safety Upgrades, completed in October 2025, added buffered bike lanes that connect the Centennial Trail to Maxwell at Walnut. The City's Bicycle Priority Network highlights lower-stress corridors parallel to the high-traffic Ash/Maple Street north–south couplet, with intersecting bike-friendly routes completing east–west connections between the river and the Division Street corridor.

Northeast Spokane

Northeast Spokane's bicycle network features the Children of the Sun Trail, which is a shared-use path along the North Spokane Corridor that links the county area of Wandermere south toward Spokane Community College and the Centennial Trail. The City's Bicycle Priority Network focuses on linking neighborhoods to this north-south connector and to major activity corridors. Emphasis is on creating lower-stress east–west alternatives to Wellesley Avenue to link the Market and Haven Street corridor with the Division Street Corridor and improve access to schools, parks, and transit.

Center City

The Center City's bicycle network is primarily composed of shared use paths, with additional bike-friendly routes located throughout the area. Despite this multimodal presence, some of Spokane's highest-stress bicycle facilities are located in Center City, contrasting with its well-developed pedestrian network. One notable low-stress facility ~~is~~will be the under-construction ~~bike-friendly~~ neighborhood greenway~~route~~ along Pacific Avenue, which is classified as LTS 1, and the existing Centennial Trail which provides a continuous shared-use facility extending east-west through downtown. Both routes provide more comfortable connection for cyclists in the downtown core.

South Hill / South Spokane

This subarea features a range of bicycle facilities, including bike-friendly routes, shared use paths, and bike lanes. In some locations, neighborhood greenways and soft surface paths supplement the network. The Ben Burr Trail provides a connection linking East Central and Lincoln Heights to the Centennial Trail and University District. The Fish Lake Trail serves Latah Valley and Grandview-Thorpe, and the City's Fish Lake–to–Centennial Trail Connection project will extend the trail north to the Centennial Trail and improve access from these neighborhoods toward Center City. However, compared to other subareas, South Hill and South Spokane generally have fewer low-stress bicycle routes, limiting accessibility for less confident riders.

West Plains

The West Plains subarea has minimal bicycle infrastructure, with the limited network primarily composed of shared use paths, soft surface paths, and a bike-friendly route. Historically, many segments are high-stress for everyday cycling. Sunset Boulevard provides a key connection between the West Plains, Spokane International Airport, and the broader Spokane network, and the City's Sunset Highway Trail – Spotted Road to Royal Street project. This project will provide a 10 to 12-foot dedicated multi-use path on the north side of Sunset, improving safety and connectivity for people biking and walking along the corridor.

Transit Network

Transit in Spokane is governed primarily by Spokane Transit Authority (STA). STA has established several transit plans to guide the development of the transportation network, such as STA Connect 2035, the Zero-emission Transition Plan, STA Moving Forward, as well as major ongoing projects such as Division Street Bus Rapid Transit and the I-90/Valley High Performance Transit (HPT) Project.

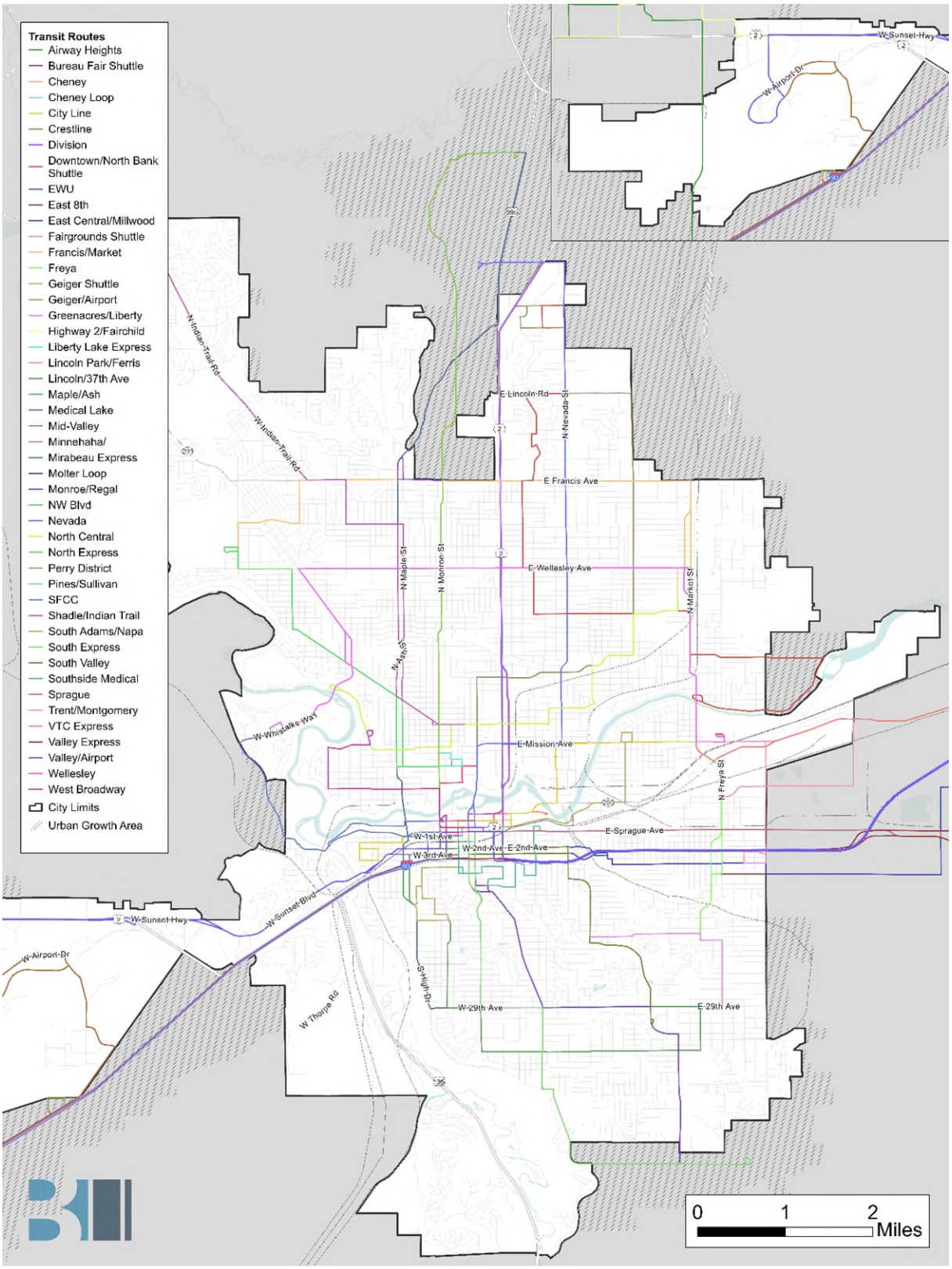
STA's fixed route transit network consists of frequent routes, regional routes, Bus Rapid Transit (BRT), and regular transit routes. **Exhibit 3.7-4** provides a summary of the existing STA routes. In addition, the City's existing transit network is shown in **Exhibit 3.7-5**. There are several transit routes throughout the Center City and options for east-west connectivity, especially due to transit offerings along I-90.

Exhibit 3.7-4. Summary of Existing Fixed Transit Types and Descriptions

Route Type	Route Type Description
Bus Rapid Transit (City Line - STA Route 1)	Frequent rapid transit service along the six-mile route between Browne's Addition and Spokane Community College, connecting through downtown and the University District, including Gonzaga University.
Frequent Routes	Local service at frequent intervals: every 15 minutes on weekdays and every 15-60 minutes on weekends.
Regional Routes	STA operates several regional and commuter routes between major destinations. These routes are designed to provide regional links and typically serve Park & Ride lots, transit centers, and key destinations during peak commute times.
Regular Routes	Local service at varying intervals: every 30-60 minutes on weekdays and varying service by route on weekends and nights. Multiple routes may serve certain segments/stops, which combine to provide more frequent service.

Source: Spokane Transit Authority

Exhibit 3.7-5. Existing Transit Routes in Spokane



Sources: City of Spokane, Fehr & Peers, 2025

While the City does not operate local transit, it supports transit by partnering with STA on street, sidewalk, and bikeway improvements that enhance transit reliability and access. The City also coordinates with STA on bus-priority treatments such as Business Access and Transit (BAT) lanes and transit signal priority.

Several projects are currently in development by STA to enhance the City's transit network. Division Street Bus Rapid Transit (BRT) is part of a regional vision to bring frequent, reliable service along the US 2 corridor within the City of Spokane. STA, the project's lead agency, is implementing several enhancements including improved passenger facilities, transit priority elements, and Business Access and Transit (BAT) lanes. Construction is expected to begin in 2028. In addition, the I-90/Valley High Performance Transit (HPT) Project is expected to establish new transit service and transit amenities, such as Park-and-Rides and transit centers throughout the region, focusing on the I-90 corridor.

Northwest Spokane

This subarea is served by STA's frequent and regular routes providing connections to Center City and east–west across the city. Frequent routes that link Northwest Spokane with Center City and Northeast Spokane include Route 4 (Monroe Street) and Route 33 (Wellesley Avenue), respectively. Other key regular routes within this area include Route 22 (Northwest Boulevard), 23 (Maple/Ash Street), Route 35 (Francis Avenue), and Route 36 (Maxwell Avenue).

Northeast Spokane

This subarea is similarly served by STA frequent and regular routes. Route 28 (Hamilton/Nevada Street) offers frequent north–south connections to the Center City, and Route 33 (Wellesley Avenue) provides frequent service between Northeast and Northwest Spokane. Consistent with STA's plans, Route 33 (Wellesley) is identified for future investment as a High-Performance Transit corridor and is slated to be the next major route improvement following Division Street BRT. Service includes continuations of Route 35 (Francis Avenue) and Route 36 (Maxwell Avenue), plus regular service of Route 27 that connects Center City and Shiloh Hills and Route 31 that connects Shiloh Hills to Spokane Community College. The City Line provides high-frequency service linking the University District and Spokane Community College, crossing the Spokane River, and connecting Northeast Spokane to Center City.

Center City

Center City functions as both a major destination and a transfer hub within the STA network, with most transit routes offering connections throughout the subarea. Several regional routes pass through Center City, linking it to other parts of Spokane County. The City Line BRT Route also runs predominantly through this subarea, reinforcing its role as the core of the regional transit system.

South Hill / South Spokane

This subarea is served by Route 4, a single frequent route, that connects its southeastern neighborhoods with Center City. Regular transit routes in South Hill and South Spokane operate at lower frequencies and provide broader geographic coverage across the area. The Latah Valley currently does not have fixed route service.

West Plains

Transit in the West Plains is organized around the West Plains Transit Center (WPTC), which functions as the area's transfer hub. The area within the city limits is served by three STA routes: Route 61 (Highway 2/Fairchild), a regular route along US 2/Sunset Highway serving Airway Heights and Fairchild AFB; Route 7 (Valley/Airport), a high-speed regional link that provides service between Downtown/Spokane Valley and Spokane International Airport; and Route 6 (Cheney) providing frequent, limited-stop service between Downtown/University-District, the West Plains, and Cheney.

Vehicle Network

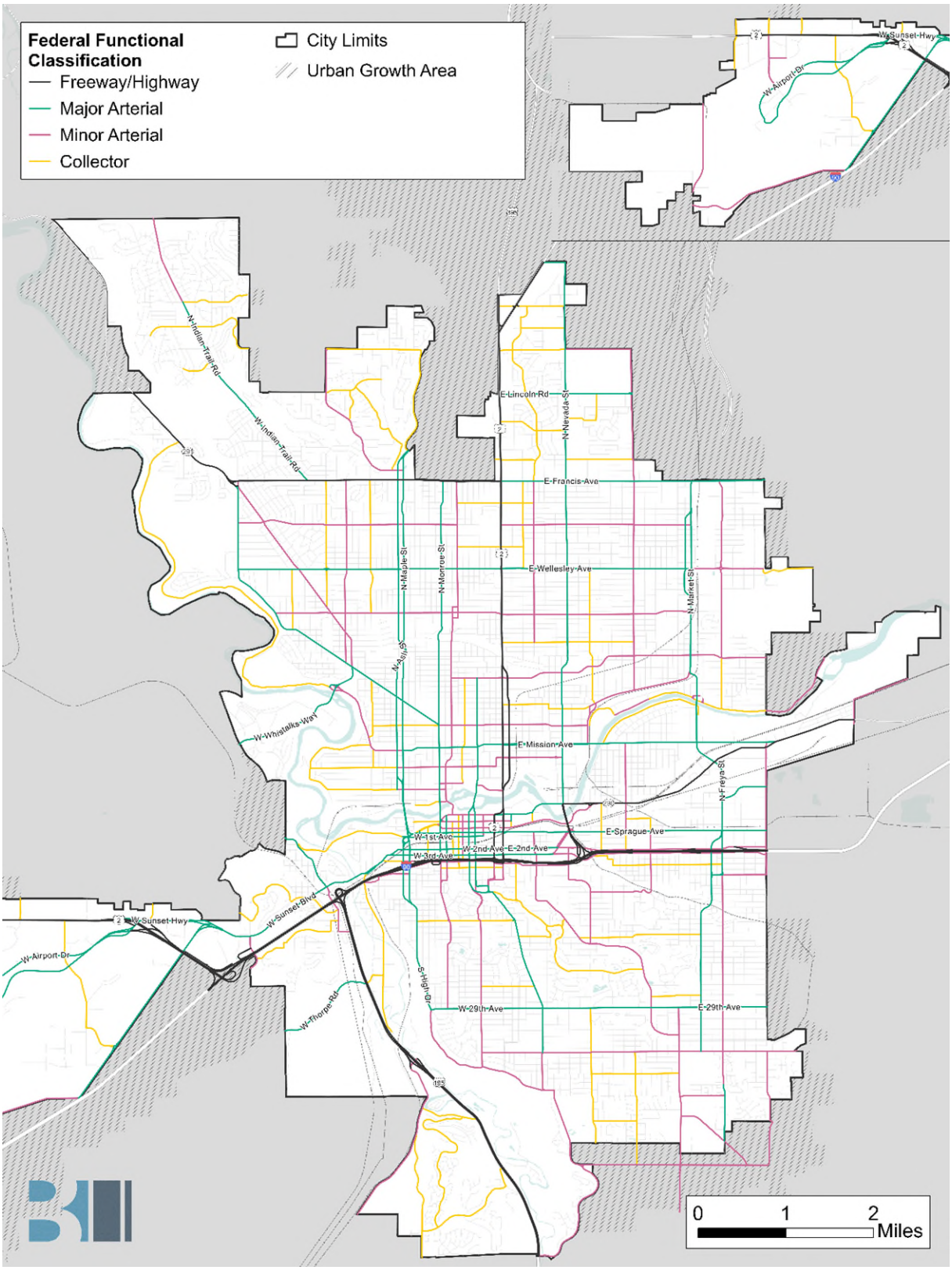
The City of Spokane is a major regional hub, with a vehicle and freight network that connects Washington, Idaho, Montana, Oregon, British Columbia, and Alberta. The City's vehicle network consists of major arterials, minor arterials, collector, and local access streets, as shown in **Exhibit 3.7-6**. Currently, the vehicle network includes five highways: I-90, US 2, SR 290, SR 291, SR 395, and SR 195. However, the regional network will soon be expanded by the completion of the North Spokane Corridor (NSC) project, a 10.5-mile multi-modal connection ~~between I-90, US 2, and~~extending SR 395 to I-90.

As part of the previous Spokane Comprehensive Plan update in 2017, the City also substantially updated their Street Design Standards[2]. The City's Street Design Standards shape the development, redevelopment, and reconstruction of facilities built in the City's right-of-way and ensure their consistency. As part of their Street Design Standards, the City provides definitions and applications for its principal street classifications. These street classifications are expected to be evaluated alongside zoning contexts when initiating the design process for modifications to the City's roadway infrastructure.

The City's vehicle network and its functional classifications are summarized in **Exhibit 3.7-6** below. The arterials tend to follow a grid pattern, especially within the Center City. The Spokane River shapes the layout of some roads, while also dividing South Spokane from the rest of the city. In addition, several bridges provide major crossing points to connect the vehicles, freight, and active transportation users. These bridges are mapped in **Exhibit 3.7-7** below.

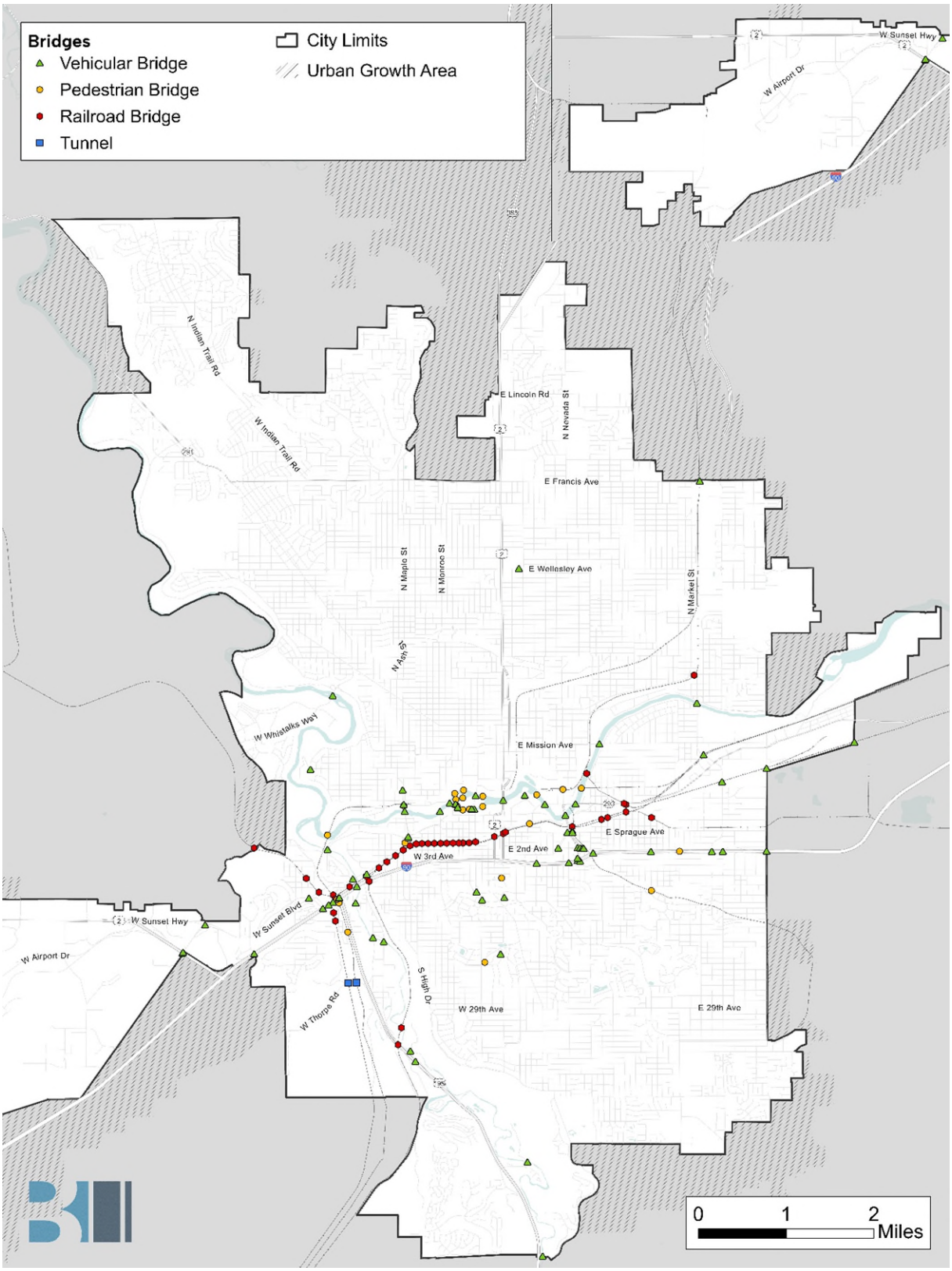
[2] City of Spokane. "Design Standards." Engineering Services. https://my.spokanecity.org/business/bid-and-design/design-standards/

Exhibit 3.7-6. Spokane Vehicle Network and Roadway Classification



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

Exhibit 3.7-7. Spokane Transportation Network Bridges



NOTE: The exhibit above was updated with the Final EIS. Sources: City of Spokane, Fehr & Peers, 2025

Existing Intersection LOS

The following table (**Exhibit 3.7-8**) presents 22 representative intersections selected for evaluation of existing (2024) intersection LOS as part of the EIS. These intersections were chosen to ensure a diverse sample that reflects a range of neighborhood contexts and land use contexts across the city. The selection includes locations with a range of multimodal activity, existing development, and planned growth or infrastructure investment.

Exhibit 3.7-8. Spokane Intersection LOS

Location	LOS Standard	Existing (2024) LOS
S Hatch Rd and E 57th Ave (One-way stop control)	E	*E*
S SE Blvd and E 29th Ave	E	*C*
S Grand Blvd and E 29th Ave	E	*C*
N Havana St and E Sprague Ave	E	*D*
N Napa St and E Sprague Ave	E	*C*
SR 290/E Trent Ave and N Hamilton St	D	***E***
US2/S Division St and E Sprague Ave*	F	*B*
US 2/N Ruby St and E Indiana Ave*	D	*C*
US 2/N Division St and W Buckeye Ave/E North Foothills Dr	D	*C*
US 2/N Division St and Wellesley Ave	D	***E***
US 2/N Division St and W Francis Ave*	D	*D*
US 2/N Newport Hwy and E Holland Ave	D	*D*
W 3rd Ave and S Monroe St	F	*B*
N Maple St and W Boone Ave	E	*C*
E Mission Ave and N Hamilton St	E	*D*
N Market St and E Euclid Ave	E	*D*
N T J Meenach Dr and W Northwest Blvd*	E	*D*
N Ash St and W Wellesley Ave	E	*C*
E Wellesley Ave and N Haven St*	E	*C*
N Market St and E Francis Ave	E	*D*
SR 291/W Francis Ave and N Alberta St	D	*D*
US2/W Sunset Hwy and Flint Rd	D	*C*

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

Northwest Spokane / Northeast Spokane

The roadway network in this subarea follows a mostly gridded layout, with some diagonal and curvilinear streets that respond to natural features such as the Spokane River. Major highways serving

the area include US 2/Division Steet, SR 290, and SR 291, which provide regional connections and support both local and through traffic.

Division Corridor

Division Street serves as a major north-south arterial and carries the US 2 highway designation north of I-90. East-west connectivity across Division Street is supported by several intersecting arterials. One vehicular bridge carries Division Street over the Spokane River, serving as a critical crossing point within the city's transportation network. The planned STA Division Street Bus Rapid Transit (BRT) will, in phases, convert one lane in each direction to Business-Access-and-Transit (BAT) lanes. Completion of the BRT project will coincide with the final phase of the NSC, which will shift some traffic off Division Steet.

At the intersection of US 2/Division Street at Wellesley Avenue, a state-route intersection, the applicable LOS standard is D (WSDOT). The intersection is a key crossroad serving Northwest and Northeast areas. The intersection is a focal point of the Division corridor, with heavy turning movements and frequent transit activity supporting adjacent retail and services. As the Division Street BRT project is implemented in phases, this location will sit within the BRT corridor and transit service improvements.

Center City

Center City serves as a focal point of Spokane's roadway system, with many arterial streets throughout the city designed to converge on or connect with this subarea. US 2 and I-90 are the primary highways traversing Center City, and due to the presence of geographic and infrastructure barriers, including the BNSF railway and the Spokane River, this area also contains numerous bridge crossings that facilitate multimodal and vehicular access. In addition, Center City includes several parallel one-way street couplets that concentrate north–south movements and access, notably the Monroe/Lincoln couplet and the Division/Ruby one-way couplet.

At the intersection of SR 290/E Trent Avenue and N Hamilton Street, a state-route intersection, the applicable LOS standard is D (WSDOT). Existing operations are LOS E, indicating the location fails to meet standard under current conditions. The intersection is within the South Logan TOD Planned Action Area established to implement the South Logan Transit-Oriented Development Plan.

South Hill / South Spokane

South of I-90, the street network begins as a grid but becomes more irregular where challenging topography limits road construction. I-90 and SR 195 serve as the primary highway connections in this subarea. Several vehicular bridges span SR 195, I-90, and other geographic constraints, supporting access between residential areas, employment centers, and regional corridors.

West Plains

The West Plains subarea is primarily served by I-90 and US 2, which provide east-west and regional connectivity. There are two key vehicular bridges in this area, one crossing I-90 and another crossing Sunset Highway, that facilitate access across these major corridors.

State Facilities

The City of Spokane is served by a network of state-owned highways (**Exhibit 3.7-9**) that are essential for regional mobility, freight movement, and economic development. These facilities are owned and maintained by the Washington State Department of Transportation (WSDOT) and include both Highways of Statewide Significance (HSS) and other regionally significant routes.

Exhibit 3.7-9. State Routes and Functional Classifications

Route	Functional Classification	Description and Connectivity
I-90	Urban–Interstate	A major east-west corridor connecting Spokane to Seattle and the Midwest. It is the primary interstate route through Spokane and a critical freight and passenger corridor.
US 2	Urban Other Principal Arterial	Connects Spokane to northern Idaho and western Washington. US 2 spans east-west across the West Plains and north-south between Northwest and Northeast Spokane. It provides access to Spokane International Airport and supports regional freight and commuter traffic.
US 395	Urban Other Freeways and Expressways	A north-south corridor connecting Spokane to Colville and Canada. Along Northeast Spokane, the North Spokane Corridor (NSC) is a major realignment project for this route to improve freight mobility.
US 195	Urban Other Freeways and Expressways	Connects Spokane to Pullman and Lewiston, Idaho. Within South Hill/South Spokane, it is a key highway for travel and freight south of I-90.
SR 290	Urban Other Principal Arterial	Connects downtown Spokane to Spokane Valley and Idaho. It supports commuter and freight traffic and is a designated freight corridor.
SR 291	Urban Other Principal Arterial	Serves Northwest Spokane and connects to Nine Mile Falls. It supports local and recreational travel.

Sources: WSDOT, Fehr & Peers, 2025

These classifications are consistent with WSDOT's functional classification system and are used for planning, funding, and performance monitoring purposes.

SEPA and State-Owned Facilities

The City of Spokane is evaluating adoption of the housing infill State Environmental Policy Act (SEPA) categorical exemption under RCW 43.21C.229 for part of the city (see **Chapter 6, Appendix E**), and potential updates to local categorical exemption thresholds as outlined in WAC 197-11-800, as part of this Comprehensive Plan EIS. This EIS evaluates those exemptions under each growth alternative,

including the required multimodal transportation analysis of impacts to the local network, neighboring jurisdictions, transit facilities, and the state transportation system. ~~If specific adverse impacts are identified with the Action alternatives, mitigation will be proposed and~~Improvements needed to meet LOS and other requirements would be implemented through locally adopted plans such as the updated Transportation Element and Transportation Facilities Plan, capital improvement programs, and development regulations consistent with RCW 43.21C.229.

In accordance with RCW 43.21C.229 and WAC 197-11-800, the City of Spokane ~~will~~ has consulted with ~~the~~ WSDOT ~~when proposed~~regarding SEPA exemptions or threshold increases that may affect state highway facilities.

Existing State Facility Segment v/c ratios

The following table (**Exhibit 3.7-10**) summarizes selected state highway segments within the City of Spokane used to evaluate directional weekday PM peak-hour volume-to-capacity (v/c) ratios. Segments were chosen to represent a mix of facility types and land-use contexts and to align with locations where WSDOT collected directional hourly traffic counts in 2024. Planning capacities are the directional link capacities from the Spokane Regional Transportation Council (SRTC) regional travel demand model; volumes are the 2024 WSDOT counts at the listed locations. The v/c ratio equals the directional weekday PM peak-hour volume divided by the corresponding planning capacity.

Exhibit 3.7-10. Existing State Facility Performance (v/c Ratio)

Location	Roadway Type	Existing Volume/Capacity	Existing v/c Ratio
I-90 east of the US 2 interchange (Spokane)	Freeway	8,340 / 13,300	0.63
I-90 west of the Sprague Ave interchange (Spokane Valley)	Freeway	11,130 / 11,400	0.98
US 2 north of North River Dr - northbound only (Spokane)	Arterial	2,530 / 4,900	0.52
US 2 (Division St couplet) south of Euclid Ave - southbound only (Spokane)	Arterial	1,720 / 4,900	0.35
US 2 north of Walton Ave (Spokane)	Arterial	3,610 / 9,800	0.37
US 2 east of the Sunset Frontage Rd intersection	Arterial	3,080 / 6,200	0.50
SR 291 northwest of the Wind River Dr intersection	Arterial	1,290 / 6,200	0.21

Location	Roadway Type	Existing Volume/Capacity	Existing v/c Ratio
SR 291 northwest of the Nine Mile Rd wye connection	Arterial	2,000 / 6,200	0.32
US 195 south of the I-90 off-ramp	Freeway	2,150 / 6,900	0.31
SR 195 northwest of the Cheney–Spokane Rd on-ramp	Freeway	2,020 / 7,600	0.27
US 195 north of Hatch Rd (median crossover location)	Freeway	1,430 / 6,200	0.23
SR 902 south of the Geiger Blvd wye connection	Arterial	1,510 / 2,600	0.58

Sources: WSDOT, SRTC, Fehr & Peers, 2025

Northwest Spokane

Within the city, SR 291 serves the Northwest area and connects Spokane to Nine Mile Falls and SR 231. Existing v/c ratios of 0.21–0.32 indicate available corridor capacity.

Northeast Spokane

WSDOT is constructing the NSC as a new limited-access freeway that will connect I-90 to US 2 at the north end of the city. Remaining phases include the I-90 connection, with WSDOT indicating completion in 2030. Once open, the NSC adds north–south capacity for regional and local trips and facilitates a shift of traffic from local arterials to the new regional connector. SR 290/Trent Ave is an east–west state route linking the University District to the Idaho state line, functioning as an alternate to I-90 for commuter and freight movements.

South Hill / South Spokane

US 195 is the main southern corridor, linking South Hill and the Latah Valley to I-90 and downtown. Existing v/c ratios of 0.23–0.32 indicate available capacity. However, due to continued growth in the Latah Valley, a SRTC-led US 195/I-90 study was conducted which identifies a package of near- and longer-term investments, so more short trips can use local routes, and the highway can focus on regional travel.

West Plains

US 2 connects the West Plains, including industrial areas, Fairchild Airforce Base, and Spokane International Airport, to central Spokane. US 2 also connects to the neighboring City of Airway Heights. An existing v/c ratio around 0.50 indicates moderate utilization with remaining capacity.

Division Corridor

US 2/Division Street is currently the main north-south corridor for north of I-90. Existing v/c ratios of 0.35–0.52 indicate available capacity in the corridor. The planned STA Division Street BRT will, in phases, convert one lane in each direction to Business-Access-and-Transit (BAT) lanes. Completion of

the BRT project will coincide with the final phase of the NSC, which will shift some traffic off Division Street.

I-90

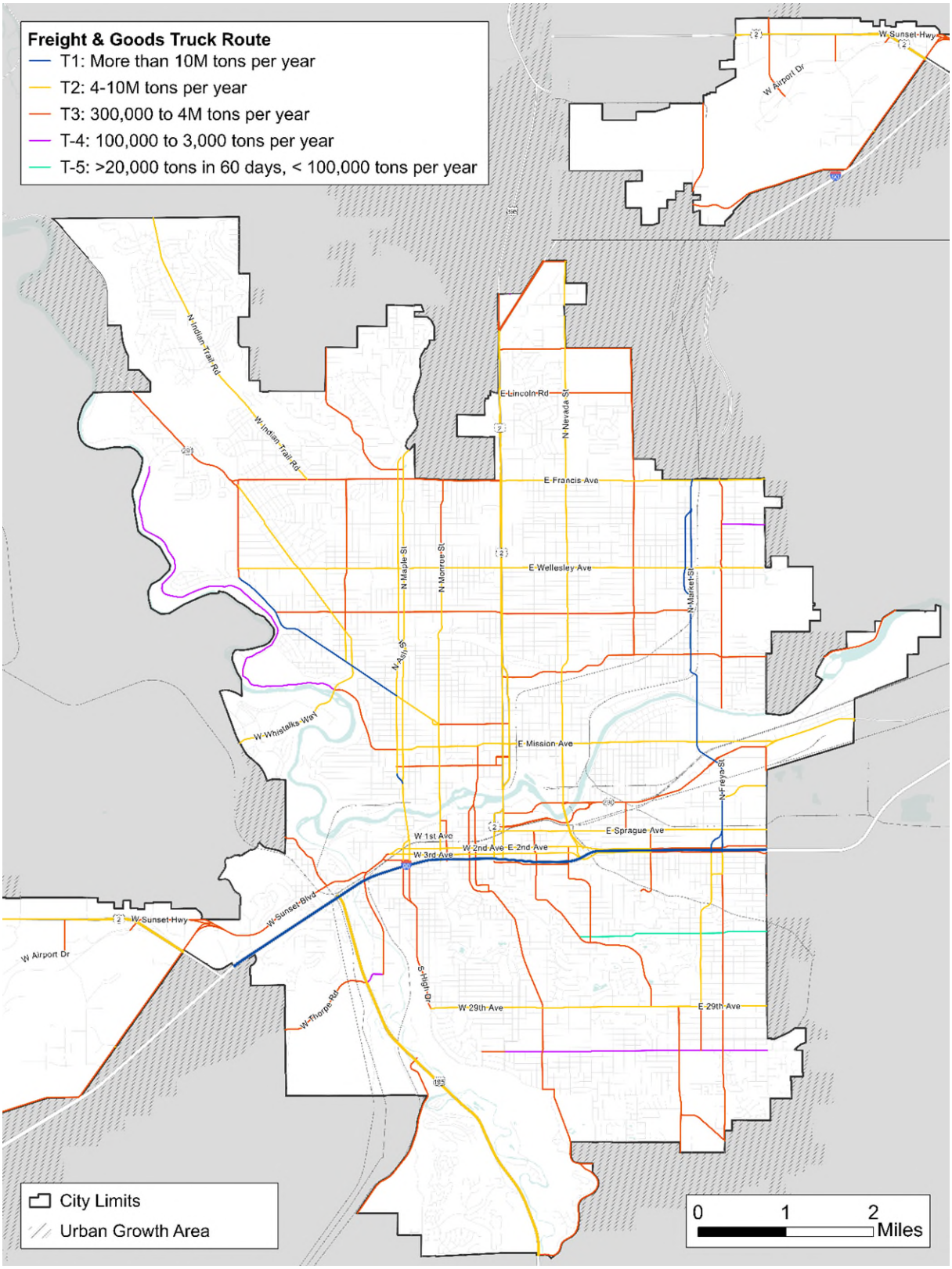
I-90 is the primary east–west corridor, carrying most regional through-traffic with limited alternatives. Existing v/c is approaching 1.0, indicating the facility is at capacity. Current regional plans focus on interchange/bridge projects and transit along the corridor; no additional mainline capacity is planned.

Freight

Spokane acts as a major distribution and logistics hub for the region, especially due to its proximity to I-90 which carries more than 10 million tons of freight per year. **Exhibit 3.7-11** below shows the City's freight network and each roadway's classification under Washington State's Freight and Goods Transportation System (FGTS). The freight network in Spokane consists of I-90, state routes, and major arterials that link the city and its key freight destinations with the local, regional, and international freight network. The new North Spokane Corridor (NSC) project is anticipated to become a new key element of the City's freight network by improving mobility and freight access. By connecting US 395 to I-90, the NSC will offer an alternative north-south route through the city, relieving pressure on local arterials.

The City's zoned industrial areas include the "Yard" in the Hillyard neighborhood of Northeast Spokane, areas surrounding Trent Avenue within Northeast Spokane, and most of the West Plains area. These zoned industrial areas are shown in an overlay in **Exhibit 3.7-11**. Nearby, Spokane Valley is home to several additional industrial zones and the Spokane Valley switching yard, which is vital to the area's railway network.

Exhibit 3.7-11. Spokane Freight Routes



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

Northwest Spokane

Compared with the northeast, Northwest Spokane has limited industrial zoning with light-industrial pockets near the Center City edge, and freight activity is driven more by through truck routes than by large industrial activity. Key designated truck routes include the Maple/Ash Street couplet, which facilitate north–south freight movements into and through downtown.

Northeast Spokane

Northeast Spokane has designated industrial land-use, including the Hillyard industrial area. These areas are served by freight corridors such as the Market/Haven Street couplet with direct connections to SR 290 (Trent Avenue) and I-90. Completion of US 395/NSC by WSDOT in 2030 will strengthen regional freight movement and facilitate a shift of north-south freight traffic from local arterials to the higher-capacity corridor.

Center City

The I-90 corridor through Center City is the second of Spokane's two T1 FGTS freight routes, serving as a critical link in the regional and international freight network. Multiple highways converge in this subarea, making it a major freight hub. As a result, much of Spokane's core freight infrastructure is concentrated in the Center City.

South Hill / South Spokane

This subarea contains no designated Heavy-Light Industrial zones and has relatively limited freight infrastructure. The few freight routes that do serve this area are classified within the lower FGTS tiers, reflecting their smaller role in regional goods movement.

West Plains

The West Plains subarea is largely industrial and plays a significant role in Spokane's freight economy. It is served by FGTS freight routes, including I-90, which provide essential connectivity to regional and national freight corridors. These facilities support the movement of goods to and from large industrial developments and the Spokane International Airport.

Safety

The Spokane Regional Transportation Council (SRTC) completed in 2024 the SRTC Regional Safety Action Plan[3], which provided a high-level overview of fatal and serious injury (FSI) crashes within Spokane County from 2018 to 2022.

Within Spokane, a large share of vulnerable-user FSI (people walking and biking) occurs on arterials and in a core area. The City's Vision Zero Action Plan identifies a 12-square-mile Priority Study Area that contains 68 of 162 vulnerable-user FSI crashes. About 85% of those vulnerable-user FSI crashes occur on the arterial system. Key contributing factors include lack of traffic control, speeding, turning

[3] SRTC Regional Safety Action Plan - Crash Analysis Technical Memorandum

movements at signals, and dark lighting conditions. Recommended countermeasures emphasize leading pedestrian intervals, protected bike facilities, shorter crossings, lighting upgrades, and ADA improvements.

Spokane's ongoing Vision Zero policies, Vision Zero Action Plan, and programs – such as speed management, signal timing upgrades and LPIs, crossing protection, ADA upgrades, and access management – aid in systematically reducing risk for all growth alternatives.

A tabulated summary of updated crash data from WSDOT (2020-2024) is shown in **Exhibit 3.7-12**. The five-year data including 2024 mirrors a similar story as SRTC's Regional Safety Action Plan that people walking and biking are over-represented in KSI relative to their share of trips.

Exhibit 3.7-12. Summary of Fatal and Serious Injury Crashes by Mode and Severity in Spokane including State Routes (2020 - 2024)

Mode Type	Fatal	Suspected Serious Injury	Suspected Minor Injury	Possible Injury	No Apparent Injury	Unknown
Bicycle	2	30	183	62	24	0
Pedestrian	42	135	332	164	12	1
Pedestrian and Bicycle		1	1	0	0	0
Vehicle-Only	54	325	1956	3585	11818	550
Grand Total	**98**	**491**	**2472**	**3811**	**11854**	**551**

Sources: WSDOT, Fehr & Peers, 2025

VMT and Mode Share

Spokane's transportation environment is summarized with two systemwide metrics: vehicle miles traveled (VMT) per capita and citywide mode share. VMT per capita is a measure of total driving by the number of people generating trips in the city. Mode share (**Exhibit 3.7-13**) shows how people choose to travel on a typical weekday across all trip purposes (drive alone, shared ride, transit, walk, and bike). Both metrics come from the SRTC regional travel model for the 2024 base year and include intrazonal travel and a standard allocation of external trips to Spokane. These values provide the reference point for the Impacts section, which evaluates whether alternatives change VMT per capita relative to No Action and whether Spokane's travel behavior shifts toward or away from non-auto modes.

VMT per capita (service population): 17.9 miles/person (weekday)

Exhibit 3.7-13. Mode share (all person trips, %)

Drive alone	Shared ride	Transit	Walk	Bike
50.6	39.5	1.2	7.3	1.4

Sources: SRTC, Fehr & Peers, 2025

Regulatory Context

Pedestrian Master Plan

The Spokane Pedestrian Master Plan[4] was adopted by City Council in 2015 and provides a framework for improving citywide walkability. The plan established Pedestrian Priority Zones to guide investments to areas based on walking access to key destinations, demand, and infrastructure deficiencies. These zones help the City target pedestrian infrastructure investments. The plan includes a pedestrian needs analysis, crash data review, and programmatic recommendations. It emphasizes closing sidewalk gaps, enhancing crossings, and integrating pedestrian planning with land use. Funding strategies include local, state, and federal sources, and the plan supports implementation through detailed project identification and prioritization.

Americans with Disabilities Act (ADA) Transition Plan

The City of Spokane's draft ADA Transition Plan[5], covering the years 2014-2019, outlines the City's commitment to provide equal access to public programs, services, and facilities for individuals with disabilities. It provided a comprehensive self-evaluation of the City's facilities and programs to understand existing barriers for individuals with disabilities and establish potential improvements and implementation steps. This document followed federal requirements outlined in Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 and recent amendments. Locally, street projects are guided by the Public Right of Way Accessibility Guideline (PROWAG). This plan was set to be updated every five years, but there have been no further publicized updates to this plan. Key themes from this plan relevant to transportation include:

- Addressing the backlog of accessibility needs on the public street system and ensuring compliance with current ADA standards across new capital projects, design standards, and plans

[4] Spokane Pedestrian Master Plan (2015). City of Spokane, project page.
Overview: my.spokanecity.org/projects/pedestrian-master-plan
[5] ADA Transition Plan (2014–2019). City of Spokane.
PDF (Draft/Plan document): ada-transition-plans-draft.pdf

- Emphasizing interdepartmental coordination, public outreach, and funding strategies to implement accessibility improvements.

Spokane Bicycle Master Plan

The Spokane Bicycle Master Plan[6], adopted in May 2017, aims to create a safe, connected, and accessible bicycling environment for all ages and abilities. It has been amended four times within the City's Comprehensive Plan update process and is complemented by the addition of a Bicycle Priority Network described below. The Bicycle Master Plan establishes a vision for enhancing bicycling opportunities, increasing bicycle mode share, and enhancing the City's bicycle network. It establishes a goal of 5% of all trips in Spokane being taken on a bicycle. The first part of this plan provided policies and action items meant to encourage construction of bicycle projects, support facilities, maintenance, education, funding, evaluation, and more. This plan also establishes a proposed 400-mile bicycle facility network as part of the 2017 Comprehensive Plan update. Facilities were expected to be prioritized as the opportunity arises.

Spokane Bicycle Priority Network

The City's Bicycle Priority Network[7] completed in 2024, is a citywide, all-ages-and-abilities network used to prioritize bikeway upgrades when streets are improved or redesigned and strengthen grant applications. ~~It~~ Completed in 2024, the network complements, but does not replace, the adopted Bicycle Master Plan. The Bicycle Priority Network was developed with data and community-informed measures and refined with input from the Bicycle Advisory Board. The Bicycle Priority Network includes key routes with an Expanded Priority Network of important connections.

Complete Streets Ordinance

The City's Complete Streets Ordinance[8] (17H.020) was passed in December 2011 with the purpose of ensuring all users are considered in the construction of all City transportation improvement projects. It also establishes that all street projects shall include Complete Streets elements as mentioned in the Bicycle Master Plan and Pedestrian Master Plan with an additional set of performance measures which will be reviewed through an annual progress report. A 2024 update to this ordinance also established a Transportation Commission which is meant to study significant transportation issues and programs and make recommendations that align with the overall Complete Streets Ordinance.

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[6] Spokane Bicycle Master Plan. City of Spokane.
Overview: my.spokanecity.org/projects/bicycle-master-plan
[7] Bicycle Priority Network (BPN). City of Spokane.
Project page (North/South maps & interactive viewer links): my.spokanecity.org/projects/bicycle-priority-network
[8] Complete Streets Ordinance (SMC 17H.020). City of Spokane Municipal Code.
Chapter: SMC 17H.020 – Complete Streets Program

Spokane Comprehensive Plan 2017

The City of Spokane's Comprehensive Plan[9] was last updated in 2017 and provided a guiding document for growth within the City. Chapter 4 of the Spokane Comprehensive Plan outlined the city's transportation vision and strategies through 2040. It emphasized a balanced, multimodal system that supports economic vitality, public health, and environmental sustainability. Key goals included promoting transportation choices, enhancing safety, supporting economic development, and maintaining infrastructure.

Spokane Vision Zero

The Spokane Vision Zero Action Plan[10], published in June 2023, establishes the City's commitment to eliminate fatal and serious injuries among all road users. Based on analyses from 2017-2021, the plan introduces the City's Vision Zero resolutions (2022-0107), identifies high risk corridors and intersections for all users, with a focus on particularly vulnerable road users such as pedestrians and cyclists. Key strategies include:

- Infrastructure improvements (e.g., curb extensions, protected bike lanes), speed management, and public education.
- Prioritizing equity by focusing on underserved areas
- Providing performance metrics for tracking progress.

Connect Spokane

Connect Spokane[11] is STA's comprehensive public transportation plan, originally adopted in 2010 and revised in 2024. It provides a 30-year vision for transit services, focusing on High Performance Transit, fixed-route, paratransit, and flexible services. The plan is structured around guiding principles, policies, and performance standards to ensure equitable, efficient, and sustainable transit.

Key goals include expanding multimodal access, integrating land use and transit planning, and promoting equity and sustainability. The plan outlines detailed service design principles, infrastructure investment strategies, and fare policies. It also includes performance metrics and remediation strategies to ensure continuous improvement and alignment with regional development.

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[9] Spokane Comprehensive Plan (2017 update). City of Spokane.
Comprehensive Plan hub (Shaping Spokane / current plan):
my.spokanecity.org/shapingspokane/comprehensive-plan
[10] Vision Zero. City of Spokane.
Project page: my.spokanecity.org/projects/vision-zero
[11] Connect Spokane (Comprehensive Plan for Public Transportation). Spokane Transit Authority (STA).
Plan page: spokanetransit.com/projects/comprehensive-plan

Spokane Transit Authority (STA) Planning and Projects

STA operates the City's public transportation options and currently has several plans and projects[12] to expand the transit network. These plans include STA Connect 2035, the Zero-emission Transition Plan, STA Moving Forward, as well as major ongoing projects such as Division Street Bus Rapid Transit and the I-90/Valley High Performance Transit (HPT) Project.

Horizon ~~2045~~2050: Spokane Metropolitan Transportation Plan

Horizon ~~2045~~2050[13] is Spokane Regional Transportation Council's (SRTC) long-range transportation plan and was adopted in December ~~2021~~2025. It addresses the Spokane Metropolitan Planning Area's transportation needs through ~~2045~~2050, focusing on multimodal transportation, sustainability, and performance-based planning. It provides information on regionwide demographic and land use forecasts, safety and infrastructure performance targets, and public transit, freight, and active transportation strategies.

Spokane Regional Transit Council Regional Safety Action Plan

The Spokane Regional Transportation Council's Regional Safety Action Plan[14], adopted in June 2024, establishes a regional commitment to the goal of zero roadway facilities and serious injuries with target goals in 2030 and 2042, with periodic assessments every four to five years. The plan identifies high injury networks and proposes potential targeted safety improvements across Spokane County. Other elements of this plan include detailed crash analysis, community feedback, and recommended safety strategies.

Summary and Key Findings

The regulatory context for evaluating Spokane's transportation network is shaped by several key plans and upcoming projects. The Spokane Pedestrian Master Plan (2015) and Spokane Bicycle Master Plan (2017) focus on improving the pedestrian and bicycling networks, respectively, while identifying key investment areas for each mode. Meanwhile, the City of Spokane's Complete Streets Ordinance (2011) supports the City's Pedestrian and Bicycle Master Plans and provides additional sets of performance metrics to evaluate the City's transportation network. The draft ADA Transition Plan aims to ensure

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[12] STA Planning & Projects.
Projects & Plans hub (Connect 2035, STA Moving Forward, etc.): spokanetransit.com/about-sta/projects-plans
[13] Horizon ~~2045~~ 2050 — Metropolitan Transportation Plan (MTP). Spokane Regional Transportation Council (SRTC).
MTP hub: ~~srtc.org/our-work/core-plans-and-programs/metropolitan-transportation-plan~~https://srtc.org/wp-content/uploads/2025/12/h2050_final_121125_compressed.pdf
[14] Regional Safety Action Plan (RSAP). SRTC.
RSAP page: srtc.org/our-work/safety-planning/regional-safety-action-plan

new street projects are guided by the Public Right of Way Accessibility Guideline (PROWAG) and meet ADA standards. The City's Vision Zero Action Plan (2023) and SRTC's Spokane Regional Safety Action Plan (2024) aim to eliminate traffic fatalities and injuries by targeting improvements and periodic safety assessments across the City and the region.

STA's Connect Spokane plan, along with related initiatives like the Zero-emission Transition Plan and Moving Forward, provide long-term guidance for public transit, supported by major projects such as Division Street Bus Rapid Transit and the I-90/Valley HPT Project. SRTC's Horizon ~~2045~~ 2050 regional plan addresses regional transportation needs through ~~2045~~ 2050 with a focus on sustainability and performance-based planning.

Existing conditions, gaps, and opportunities across the city are summarized below based on modal type.

Pedestrian Network

- Northwest Spokane / Northeast Spokane has several gaps in the sidewalk network, especially towards the edges of the city and along some unpaved street segments within these areas. Pedestrian priority zones are concentrated near the Spokane River, along Division Street, and near the North Spokane Corridor.
- The Center City has the highest concentration of existing sidewalks with few missing segments. Key connectors include the Post Street Bridge and the University District Gateway Bridge. Most pedestrian priority zones are located within the Center City subarea.
- South Spokane also has sidewalk gaps toward the periphery of the city, including some unpaved street segments. There are some pedestrian priority zones in this subarea, adjacent to US 2, I-90, and in the Lincoln Heights neighborhood.
- The West Plains subarea lacks a comprehensive sidewalk network and has no designated pedestrian priority zones.

Bicycle Network

- In Northwest Spokane / Northeast Spokane, east-west routes are mostly bike-friendly lacking bicycle facilities, with some shared use paths and bike lanes. North-south routes in this area vary, with higher BLTS along Maple Street and Euclid Avenue.
- The Center City subarea's bicycle network is primarily composed of shared use paths and bike-friendly routes. Despite this, some of the highest BLTS bicycle facilities are located here due to absent or substandard bicycle facilities on bicycle routes with high traffic volumes.
- The South Hill/South Spokane area features a range of bicycle facilities but generally has fewer low-stress routes compared to other subareas.
- In the West Plains subarea, the bicycle infrastructure is minimal and mostly high-stress, with limited connectivity.

Transit Network

- The subareas of Northwest Spokane / Northeast Spokane are served by many frequent routes that provide north-south connections into the Center City. East-west connectivity in this subarea is supplemented predominantly by regular routes, offering lower frequencies but greater coverage.
- The Center City subarea offers a major destination and transfer hub with most transit routes offering connections throughout the subarea, including the City Line.
- South Hill / South Spokane is served by a single frequent route connecting southeastern neighborhoods with Central City. Other routes operate at lower frequencies.
- In the West Plains subarea, transit service is served by high-speed regional routes and other regular routes.

Vehicle Network

- In Northwest Spokane / Northeast Spokane, the roadway network follows a mostly gridded layout with major highways including US 2, SR 290, and SR 291.
- In Center City, US 2 and I-90 are the primary highways, and many arterial streets converge into the Center City.
- For South Hill / South Spokane, the street network has topographical challenges south of I-90. I-90 and SR 195 are the primary highways.
- The West Plains area is primarily served by I-90 and US 2, which provide essential connectivity.
- Division Street serves as a major north-south arterial and carries the US 2 highway designation north of I-90. East-west connectivity across Division Street is supported by several intersecting arterials. One vehicular bridge carries Division Street over the Spokane River, serving as a critical crossing point within the city's transportation network.

Metrics evaluated for the vehicle network include intersection LOS and segment LOS:

- Intersection LOS was evaluated at 22 intersections within the city and WSDOT using LOS standards. Of these intersections, two locations currently fail to meet their LOS standard: S Hatch Rd/57th Avenue, located in **South Spokane**; and Division Street (US 2)/Wellesley Avenue on the **Division Street Corridor**.
- Of the state facilities that were evaluated for segment LOS, none currently have a v/c ratio higher than 1.00.

Freight Network

- Northwest Spokane / Northeast Spokane contains many designated industrial zones and a high-volume freight corridor providing connections to SR 290 and I-90.
- In the Center City, the I-90 corridor serves as a critical link in the regional and international freight network.
- In South Hill / South Spokane, there are no designated Heavy-Light Industrial zones, which translates to limited freight infrastructure. Existing freight infrastructure tends to be classified as lower-tier freight routes.

- The West Plains subarea is largely industrial with several higher-tier freight routes, including I-90, and key facilities like the Spokane International Airport.

Safety

Severe crashes in Spokane concentrate on higher-volume arterials and major intersections with people walking and biking over-represented in KSI crashes. A higher share of serious and fatal injuries, especially for vulnerable users, is clustered in Center City. The City's Vision Zero policy and related programs provide the citywide framework for prioritizing investments regardless of alternative.

VMT and Mode Share

Spokane's travel is predominantly auto oriented. VMT per capita is 17.9. Mode share: 50.6% drive alone, 39.5% shared ride, 1.2% transit, 7.3% walk, 1.4% bike. Values come from the SRTC regional model. These metrics provide the reference point for evaluating alternatives.

3.7.2 Impacts

This section provides an overview of the impacts related to each of the ~~three~~ four future year alternatives established by the City of Spokane: Alternative 1: Stay the Course (the No Action alternative), Alternative 2: Distributed and Balanced, ~~and~~ Alternative 3: Center City and Regional Hubs, and the Preferred Alternative. This section also provides an overview of the thresholds of significance used to determine each alternative's impact, a description of these proposed alternatives, methodology used to evaluate the future year analyses, and an overall summary of impacts.

Description of Evaluated Alternatives

Evaluated Alternatives

The City is evaluating ~~three~~ four growth alternatives as part of the Comprehensive Plan update. Each alternative accommodates projected population and employment growth but differs in how development is distributed, the intensity of land uses, and the relationship to transportation infrastructure. More detailed descriptions of the land use assumptions and policy basis for these alternatives are provided in **Chapter 2**.

Alternative 1 – Stay the Course (No Action)

This alternative represents continuation of the current Comprehensive Plan, zoning, and development regulations. Growth would follow existing patterns under current rules, with jobs and housing allocated consistent with Spokane Regional Transportation Council (SRTC) projections. While this scenario provides sufficient overall capacity to meet growth targets, it does not substantially change land use or transportation relationships compared to today.

Alternative 2 – Distributed and Balanced

This alternative focuses additional housing and employment growth along frequent transit corridors and emphasizes a stronger jobs–housing balance. It applies recommendations from the Centers and Corridors Study to simplify land use designations, encourage mixed use, and support neighborhood-scale retail. Growth is more evenly distributed across the city, with capacity for housing at all income levels. Employment assumptions reflect State Employment Security Department trends. This alternative is intended to leverage the transit network to support transportation and climate goals.

Alternative 3 – Center City and Regional Hubs

This alternative directs the greatest concentration of growth to Center City, selected corridors, and regional hubs. Housing growth is focused in urban centers with high-capacity transit, while major job growth is allocated to the West Plains, Northeast Spokane, Downtown, and University District. Industrial and institutional job concentrations align with regional transportation facilities such as the airport, rail corridors, and the North Spokane Corridor (NSC). This alternative places a greater emphasis on investment in a limited number of hubs and corridors to maximize transportation infrastructure efficiency.

Preferred Alternative

NOTE: *Analysis for the Preferred Alternative was added below with the Final EIS.*

The Preferred Alternative blends features of all Draft EIS studied alternatives. Like Alternative 3, the Preferred Alternative focuses housing growth in major hubs, particularly in the Center City, and provides additional education/health jobs in the city center and University Area. It concentrates new industrial jobs in public development authorities in West Plains and Northeast Spokane. Like Alternative 2, the Preferred Alternative designates mixed use and housing growth along bus rapid transit lines and corridors that have frequent transit. Corridors would have a range of businesses, housing densities, and livability/streetscape improvements. Several corridors improve connections between major hubs (Downtown transit and street network, airport, rail corridors, NSC). Like Alternatives 2 and 3, the Preferred Alternative allows new neighborhood/small scale retail nodes according to locational criteria.

Analysis Methodology

The transportation analysis evaluates how each growth alternative would affect the city's multimodal network, including roadway operations (for autos and freight), transit demand, walking, bicycling, and safety conditions. Key elements of the methodology include:

Transportation Network Assumptions

This EIS uses Spokane Regional Transportation Council's (SRTC) regional travel demand model (TDM), which has a 2022 base year and a 2050 forecast horizon. Results for this study are reported for 2024

existing conditions and a 2046 horizon year. The 2024 base year is used because screenline volumes and turning-movement counts were collected in 2024 and used to validate the model for this analysis. To quantify land use for 2024 and 2046, households and employment were linearly interpolated at the Transportation Analysis Zone (TAZ) level between SRTC's 2022 base and 2050 forecasts, then input to the TDM to produce network outputs for 2024 Existing and the 2046 alternative scenarios. Resulting daily 2024 volumes from the TDM are within 2 to 4% of 2022, providing a current, representative baseline while remaining consistent with the 2022–2050 SRTC model framework.

The analysis also incorporates planned transportation investments by the City and partner agencies, and these projects provide the baseline network assumptions. Major projects particularly relevant to this analysis include:

- **North Spokane Corridor (NSC):** Completion of the NSC, along with associated transit investments.
- **Division Street Bus Rapid Transit (BRT):** Implementation of high-capacity transit service and Business Access and Transit (BAT) lanes along Division Street.

In addition to these projects, the model includes a range of roadway extensions, intersection improvements, safety enhancements, and transit upgrades delivered by the City of Spokane (Six-Year Comprehensive Street Program), Spokane County (Six-Year Transportation Improvement Program), WSDOT, and Spokane Transit Authority (Connect Spokane and the Transit Development Plan). See **Chapter ~~5~~ 6 Appendix C Transportation Project Implementation Table** for each modeled project's lead agency, status, and funding pathway.

Regional plans are updated periodically, and additional projects may be adopted before the City's 2046 horizon year. For this EIS, these projects serve as an assumption for reasonably foreseeable transportation network improvements applied across all growth alternatives.

Travel Demand Forecasting

The Spokane Regional Transportation Council (SRTC) maintains a regional travel demand model that is used to predict how travel behavior will change based on land use and transportation network inputs. The model is a tool best used to compare the relative differences among alternatives rather than to provide a precise prediction of future travel behavior. In other words, the model identifies which growth alternatives are likely to result in greater or lesser transportation impacts, though the exact locations and magnitude of future impacts cannot be forecasted with certainty in this programmatic EIS where specific development projects are unknown.

The SRTC model is a conventional four-step model, meaning it estimates travel patterns by sequentially estimating trip generation, trip distribution, mode choice, and trip assignment. It relies on survey data, demographic information, land use assumptions, and transportation system characteristics to represent the ways people travel in the Spokane region. The model is regularly calibrated and validated to reflect observed conditions and regional travel surveys.

Key features of the SRTC travel demand model include:

- **Analysis Years:** The most recent model update established a base year of 2022 and a forecast horizon year of 2050. As noted within the Transportation Network Assumptions subsection, the results for this analysis are reported for 2024 existing conditions and a 2046 horizon year.
- **Land Use:** Land use forecasts were developed for each alternative using Transportation Analysis Zones (TAZs) that cover Spokane and the broader region. TAZ-level assumptions for households, employment, and demographic characteristics are maintained by SRTC for consistency across agencies.
- **Network Representation:** The model includes the regional roadway system, major transit services, and other multimodal infrastructure. This allows forecasts of traffic volumes, transit ridership, and other metrics on key corridors and intersections across the Spokane region.
- **Transit and Active Modes:** In addition to auto and truck travel, the model estimates demand for transit, bicycle, and walking trips, supporting analysis of multimodal system performance.
- **Travel Demand:** Travel demand is forecast across four daily time periods (AM peak, midday, PM peak, and night). For this EIS analysis focuses on the PM peak period, when the largest number of trips occur.

Vehicle Network Performance

Intersection LOS and roadway segment v/c was analyzed at the same 22 study intersections and 12 state highway segments as were analyzed in the Affected Environment Section 3.7.1. For intersections, 2024 PM peak turning movement counts provide the existing baseline, and 2046 forecasts were developed from the SRTC regional travel demand model using standard post-processing methods. For state segments, 2024 WSDOT counts provide the existing baseline, and future-year growth from the SRTC model is added to those counts with planning capacities coming from the SRTC model network. All segment results are total, weekday PM peak hour unless noted otherwise. Results are compared to adopted City LOS standards and WSDOT standards. For state facility segments, the volume to capacity (v/c) ratio is used for evaluation.

Transit and Active Modes

For each growth alternative, a comparison is drawn based on the proposed concentration of development relative to funded investments such as Division Street BRT and City Line and to pedestrian and bicycle networks. Results from the Vehicle Network Performance analysis are used to identify corridors where congestion or access constraints may affect transit reliability. Key considerations are walk access to transit service, continuity of bikeways, and major barriers. Findings are interpreted alongside VMT per capita and mode share and used to inform the determination of significant impacts and potential mitigation.

VMT and Mode Share

Vehicle Miles Traveled (VMT) is the sum of all miles traveled by vehicles in the city over the course of a particular period. For the purposes of this EIS, VMT is aggregated at the daily level using the SRTC regional travel demand model for 2024 Existing and 2046 for all alternatives and then divided by the

total number of Spokane residents and workers for each scenario. Therefore, VMT per capita is an estimate of the average number of vehicle miles traveled by each Spokane resident and/or worker. This metric speaks to how travel behavior may shift with different land use concentrations and mixes as it captures changes in mode choice as well as vehicle trip length.

Mode share is the proportion of person trips taken by each travel mode. This EIS reports daily mode share for trips that begin or end within the City of Spokane using the SRTC regional travel demand model for 2024 Existing and 2046 for all alternatives. Modes are reported as drive alone (SOV), shared ride (HOV), transit, walk, and bike. Mode share indicates how travel behavior is expected to change with different land use patterns and transportation investments.

Thresholds of Significance

The thresholds used to determine the impacts of all three alternatives include both quantitative and qualitative assessments, which are described in **Exhibit 3.7-14.**

Exhibit 3.7-14. Thresholds of Significance

Performance Metric	Thresholds of Significance
Active Transportation Network Completeness	**Alternative 1 (No Action):** A significant impact is identified if the City cannot achieve 100% of the 2017 Bicycle Master Plan network by 2037 as established in the previous Spokane Comprehensive Plan (TR 5) or if pedestrian improvements are not advanced in designated Pedestrian Priority Zones. **Action Alternatives:** A significant impact is identified if network completion under the Action alternative lags relative to the No Action alternative or fails to accelerate progress toward bicycle and sidewalk network completeness.
Active Transportation Usage	**Alternative 1 (No Action):** A significant impact is identified if bicycle ridership fails to increase toward the 2017 Bicycle Master Plan goal of quadrupling by 2036 (relative to 2016 levels). **Action Alternatives:** A significant impact is identified if ridership increases are less than the No Action alternative.
Traffic Safety	**Alternative 1 (No Action):** A significant impact is identified if there is noncompliance with the City's Vision Zero resolution, adopted in late 2022, meaning there is an increased risk of any single traffic death or injury on City streets by 2042 (Vision Zero resolution horizon year). **Action Alternatives:** A significant impact is identified if an Action alternative would increase the likelihood of additional severe or fatal crashes compared to the No Action alternative.

Performance Metric	Thresholds of Significance
Transit Access and Performance	**Alternative 1 (No Action):** A significant impact is identified if study intersection or corridor LOS falls below adopted standards (LOS F within Downtown and within designated Centers/Corridors; LOS E elsewhere) or if pedestrian/bicycle connections to STA facilities decline. **Action Alternatives:** A significant impact is identified if there is an impact according to the vehicle network performance thresholds for facilities used by transit.
Vehicle Network Performance	**Alternative 1 (No Action):** A significant impact is identified if vehicle operations fail to meet adopted intersection standards: LOS F (>120 seconds of delay) within the Downtown and the area bounded by and including the Spokane River, Maple Street, 5th Avenue, and Sherman Street, and within zones that are designated by the City as "Centers and Corridors"; LOS E applies elsewhere. For state routes, an impact occurs if a state facility does not meet the standard set by WSDOT (LOS D, segment volume-to-capacity (v/c) 1.00). **Action Alternatives:** A significant impact is identified if an intersection (city or state facility) degrades from an acceptable LOS in the No Action scenario; if the intersection already exceeds LOS thresholds in the No Action scenario, then an impact is identified if delay increases by 5 or more seconds. For state route segments, a significant impact is identified if the segment v/c increases by ≥0.05 at a location already at or above 1.00 under the No Action alternative.
VMT per Capita and Mode Share	**Alternative 1 (No Action)**: A significant impact is identified if daily VMT per capita increases by ≥ 1.0 miles/person or if SOV (drive alone) share increases by ≥ 1.0 percentage point over 2024 conditions. **Action Alternatives**: A significant impact is identified if daily VMT per capita increases by 0.2 miles/person or if SOV share increases by 0.2% relative to the No Action alternative.

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

Impacts Common to All Alternatives

This section describes the assessed impacts common to all alternatives.

Pedestrian Network

The City's Pedestrian Master Plan, which recommended policies and actions to support a more walkable Spokane, supports the City of Spokane pedestrian system upgrades. The Pedestrian Master Plan also established City Pedestrian Priority Zones, which are discussed in further detail within the

Affected Environment section. This Pedestrian Master Plan acts as an implementation plan under the conditions expected as part of the No Action alternative because the No Action alternative follows the policies and actions in place during the creation of the Pedestrian Master Plan. Under the No Action alternative, these Pedestrian Master Plan improvements would be implemented to support continued growth and pedestrian activity.

With Alternative 2, housing growth would be concentrated along transit corridors, encourage mixed-use, and support neighborhood-scale retail. As redevelopment occurs in these areas, City code requires frontage improvements and reconstruction of adjoining sidewalk to meet City standards. It is expected that this alternative would not inhibit the implementation of the Pedestrian Master Plan compared to the No Action alternative.

Alternative 3 directs growth to the Center City and regional hubs, depending on high-capacity transit access and major industrial job growth. This emphasis on focused growth in targeted areas aims to maximize transportation infrastructure efficiency, which would help accelerate pedestrian improvements in these selected areas through frontage improvements. It is expected that this alternative would not inhibit the implementation of the Pedestrian Master Plan compared to the No Action alternative.

The Preferred Alternative directs growth to the Center City, regional hubs, and along transit corridors. As redevelopment occurs in these areas, City code requires frontage improvements and reconstruction of adjoining sidewalk to meet City standards. The emphasis on growth in targeted areas aims to maximize transportation infrastructure efficiency, which would help accelerate pedestrian improvements. It is expected that this alternative would not inhibit the implementation of the Pedestrian Master Plan compared to the No Action alternative.

Overall, none of the alternatives are expected to inhibit the City's ability to improve its pedestrian network and achieve future pedestrian goals. The City will continue to move forward with other neighborhood improvements, prioritization, and future planning of pedestrian improvements. In parallel, the planned refresh to the Pedestrian Master Plan will update the City's baseline and prioritization to reflect growth, needs, and project delivery since 2017.

Finding Common to All Alternatives

Growth would increase walking activity, and adopted programs will continue regardless of the selected alternative. Impacts to the pedestrian network are expected to be similar across alternatives and not result in a significant impact.

Bicycle Network

Through the City's Bicycle Master Plan, the City of Spokane provided categorizations for its various bicycle facility types and established a desired 2037 bicycle network. The Bicycle Master Plan also established a bicycle ridership goal, which aims to quadruple bicycle ridership between 2016 and 2036. The Bicycle Master Plan establishes the City's implementation plan under the conditions expected as part of the No Action alternative.

The No Action alternative retains the same policies, actions, and land use expectations as anticipated during the creation of the Bicycle Master Plan. Therefore, the improvements highlighted under the Bicycle Master Plan are expected to be implemented to support continued growth in cyclist activity.

Alternative 2 places additional housing growth along transit corridors, encourages mixed-use, and supports neighborhood-scale retail. Alternative 3 directs growth to the Center City and regional hubs based on high-capacity transit access and major industrial job growth. The Preferred Alternative blends the growth allocations from Alternatives 2 and 3. None ~~Neither~~ of these growth alternatives would necessitate reducing scope or extending the timeline of implementation of the Bicycle Master Plan compared to the No Action alternative.

Finding Common to All Alternatives

None of the alternatives are expected to inhibit the City's ability to improve its bicycle network and achieve their Bicycle Master Plan goals such as increasing bicycle ridership, although implementation pace may depend on funding, land use patterns, and other construction activity.

State Facilities

The state facilities reviewed are located across the city, with a select number just outside the city limits, and include I-90, US 2, US 195, SR 902, SR 291, and SR 195. For each alternative, growth from the SRTC regional travel demand model was added to existing WSDOT 2024 counts at the study locations to estimate future volumes. The directional link capacities from the SRTC model are used as planning capacities for this analysis.

Results in **Exhibit 3.7-15** reflect weekday PM peak hour, directional conditions at selected state segments.

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

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

The regional demand modeling results for the Preferred Alternative were compared against Alternative 1 (No Action). The analysis shows that the Preferred Alternative would have slightly less demand volume on most study segments than in Alternative 1. All locations would still have a v/c ratio less than 1.0.

Exhibit 3.7-15. Spokane Existing State Facility Volume-to-Capacity Ratio

Location	Roadway Type / Capacity	Alt 1 Volume (v/c Ratio)	Alt 2 Volume (v/c Ratio)	Alt 3 Volume (v/c Ratio)	Pref Alt Volume (v/c Ratio)
I-90 east of the US 2 interchange (Spokane)	Freeway 13,300	*10,960 (0.82)*	*11,030 (0.83)*	*11,030 (0.83)*	*10,780 (0.81)*
I-90 west of the Sprague Ave interchange (Spokane Valley)	Freeway 15,200	*13,590 (0.89)*	*13,320 (0.88)*	*13,640 (0.90)*	*13,200 (0.87)*
US 2 north of North River Dr - northbound only (Spokane)	Arterial 4,900	*2,620 (0.54)*	*2,730 (0.56)*	*2,790 (0.57)*	*2,850 (0.58)*
US 2 (Division St couplet) south of Euclid Ave - southbound only (Spokane)	Arterial 4,900	*1,670 (0.34)*	*1,640 (0.33)*	*1,680 (0.34)*	*1,440 (0.29)*
US 2 north of Walton Ave (Spokane)	Arterial 9,800	*3,410 (0.35)*	*3,300 (0.34)*	*3,350 (0.34)*	*3,310 (0.34)*
US 195 south of the I-90 off-ramp	Freeway 6,900	*2,670 (0.39)*	*2,730 (0.40)*	*2,730 (0.40)*	*2,800 (0.41)*
SR 902 south of the Geiger Blvd wye connection	Arterial 2,600	*2,260 (0.87)*	*2,300 (0.89)*	*2,280 (0.88)*	*2,260 (0.87)*
US 2 east of the Sunset Frontage Rd intersection	Arterial 6,200	*5,140 (0.83)*	*5,230 (0.84)*	*5,150 (0.83)*	*4,660 (0.75)*
US 195 north of Hatch Rd	Freeway 6,200	*1,670 (0.27)*	*1,640 (0.27)*	*1,680 (0.27)*	*2,000 (0.32)*
SR 291 northwest of the Wind River Dr intersection	Arterial 6,200	*1,840 (0.30)*	*1,830 (0.29)*	*1,840 (0.30)*	*2,030 (0.33)*
SR 291 northwest of the Nine Mile Rd wye connection	Arterial 6,200	*2,510 (0.40)*	*2,580 (0.42)*	*2,500 (0.40)*	*2,610 (0.42)*
SR 195 northwest of the Cheney–Spokane Rd on-ramp	Freeway 7,600	*2,250 (0.30)*	*2,200 (0.29)*	*2,220 (0.29)*	*2,400 (0.32)*

Sources: WSDOT, SRTC, Fehr & Peers, 2025

Finding Common to All Alternatives

No significant impacts to state facilities are identified for any future year alternatives because all segments evaluated are expected to maintain v/c ratios below the threshold of 1.0 during the PM peak.

Environmental Justice Implications

None of the alternatives are expected to introduce adverse transportation effects on environmental justice populations. Programmed safety and access investments such as Vision Zero-related projects and sidewalk/crossing improvements would proceed with any alternative selected.

Alternative 1: No Action, Stay the Course

The No Action alternative represents the transportation conditions that can be expected if no changes are made to currently adopted policies. Therefore, this alternative acts as the baseline against which potential impacts of the Action alternatives are evaluated. This section summarizes analysis results and identifies potential transportation impacts that are expected under the No Action alternative, as growth will continue even under currently adopted policies.

VMT per Capita and Mode Share

In Spokane, a total of 4,369,000 miles is traveled on an average weekday in the Existing (2024) scenario, and that is expected to rise to 5,928,000 miles traveled in the 2046 No Action alternative. As shown in **Exhibit 3.7-16**, this translates to VMT per capita rising from 17.9 in Existing to 19.9 by 2046 with the No Action alternative. This increase reflects existing plans in which population and job growth would generate more trips, and a greater share of growth would occur in areas that lengthen average trip distances, for example the West Plains and Hillyard employment areas. Trips between the city and neighboring jurisdictions would also rise with regional growth in the future.

Exhibit 3.7-16. Existing (2024) and Alternative 1 (No Action) VMT per Capita

	Existing (2024)	2046 Alt 1 (No Action)
VMT per Capita	17.9	*19.9*

Sources: SRTC, Fehr & Peers, 2025

Mode shares (**Exhibit 3.7-17**) are expected to remain similar to today, with small increases in walking/biking and stable transit share. Just over half of trips would continue to be made by SOV and nearly 40 percent of trips would be made by HOV.

Exhibit 3.7-17. Mode Share – No Action Alternative

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

Sources: SRTC, Fehr & Peers, 2025

Compared to 2024, the drive-alone share decreases from 50.6% to 50.3%. The shift translates to an increase in more active modes. Average weekday walking trips are expected to rise from approximately 68,000 to 85,500 and biking trips are expected to rise from approximately 13,500 to 16,600.

Finding

Compared to Existing (2024), a significant impact to VMT per capita is anticipated with the No Action alternative. No significant impact to mode share is expected with the No Action alternative.

Safety

At the planning scale, safety and exposure to conflicts can be evaluated using total VMT and VMT per capita for context. These metrics come from the regional model and are used to quantify the miles traveled. VMT is used as a measure for exposure because an increase in miles driven could result in more total crashes, even if the rate of crashes per miles driven remains the same.

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

Finding

Because total VMT and VMT per capita increases relative to Existing (2024), the No Action alternative would have a significant safety impact at the planning scale due to the increased exposure and corresponding increase in serious and fatal crashes.

Vehicle Network (Intersections)

Exhibit 3.7-18 tabulates PM peak hour LOS results for the 22 study intersections under the No Action alternative. LOS values in **bold** are not expected to meet their applicable LOS standards. The vehicle network serves all vehicle types including transit and freight, which will be discussed within this subsection.

Exhibit 3.7-18. Spokane Intersection LOS – Alternative 1 (No Action)

Study Intersection	LOS Standard	Existing (2024) LOS	2046 Alt 1 (No Action) LOS
S Hatch Rd and E 57th Ave (One-way stop control)	E	E	***F***
S SE Blvd and E 29th Ave	E	C	*D*
S Grand Blvd and E 29th Ave	E	C	*C*
N Havana St and E Sprague Ave	E	D	*E*
N Napa St and E Sprague Ave	E	C	*C*
SR 290/E Trent Ave and N Hamilton St	D	E	***F***
US 2/S Division St and E Sprague Ave*	F	B	*C*
US 2/N Ruby St and E Indiana Ave*	D	C	*D*
US 2/N Division St and W Buckeye Ave/E North Foothills Dr	D	C	*C*
US 2/N Division St and Wellesley Ave	D	E	***F***
US 2/N Division St and W Francis Ave*	D	D	***E***
US 2/N Newport Hwy and E Holland Ave	D	D	*D*
W 3rd Ave and S Monroe St	F	B	*B*
N Maple St and W Boone Ave	E	C	*C*
E Mission Ave and N Hamilton St	E	D	*D*
N Market St and E Euclid Ave	E	D	*D*
N T J Meenach Dr and W Northwest Blvd*	E	D	*E*
N Ash St and W Wellesley Ave	E	C	*C*
E Wellesley Ave and N Haven St*	E	C	*E*
N Market St and E Francis Ave	E	D	*D*
SR 291/W Francis Ave and N Alberta St	D	D	***E***
US 2/W Sunset Hwy and Flint Rd	D	C	***F***

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

Under Alternative 1, 6 of 22 study intersections would fall below their applicable LOS standards. Five of the six are on WSDOT routes, with two along the US 2/Division corridor (the Wellesley Avenue and Francis Avenue intersections), one at SR 290/E Trent Avenue and N Hamilton Street in the Center City, one at SR 291/W Francis Avenue and N Alberta Street in Northwest Spokane, and one at US 2/Sunset Highway and Flint Road in the West Plains. The remaining below-standard location is S Hatch Road and E 57th Avenue in South Spokane.

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

Finding

Applying the thresholds of significance to the 2046 No Action results, 6 of 22 study intersections constitute significant impacts because they are expected to operate below their applicable standards.

Transit and Freight

STA transit routes, freight, and trucks use network intersections as part of their regular service, so any intersection impact identified with the No Action alternative may affect performance of these modes.

The intersection of US 2/Sunset Highway and Flint Road in the West Plains is part of Route 61 (Fairchild AFB) and Route 7 (Spokane International Airport). US 2/Sunset Highway is a designated T-2 freight corridor, and Flint Road is designated T-3. The intersection delays associated with LOS F could impact performance for transit and freight.

On the US 2/Division corridor (the Wellesley Avenue and Francis Avenue intersections), the intersection LOS of F and E, respectively, could impact STA Route 25 that provides north-south service along the corridor (STA's Division Street BRT project will be discussed in Section 3.7.3 Mitigation Measures). Freight performance could be impacted since US 2/Division is categorized as a T-2 freight corridor.

SR 290/E Trent Avenue and N Hamilton Street do not have a fixed transit route that uses the intersection. However, SR 290 is identified as a T-3 freight corridor, so degraded LOS and delay could impact freight performance on this route.

S Hatch Road and E 57th Avenue is crossed east–west by Route 144 (commuter route), which currently travels on the uncontrolled approaches and therefore experiences limited control delay today. The south and west legs of the intersection are part of a T-3 freight corridor; delay at the stop-controlled south leg could impact freight performance.

SR 291/W Francis Avenue and N Alberta Street is used by Route 35 (east–west on Francis) and Route 23 (turns; west/south legs). Intersection LOS E fails to meet the standard for the intersection (LOS D) and the increased delay could affect transit performance. Both SR 291/W Francis Avenue and N Alberta Street are T-3 freight corridors. The increased delay could affect freight performance.

Finding

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

Alternative 2: Distributed and Balanced

This section summarizes the model results for Alternative 2 and the impacts expected based on the thresholds of significance stated in Section 3.7.2 *Thresholds of Significance*.

VMT per Capita and Mode Share

With Alternative 2, total vehicle miles traveled in Spokane are expected to be slightly lower than with the No Action Alternative. VMT is expected to decrease to 5,732,000 on an average weekday, 3.3% below the No Action alternative. This translates to a VMT per capita (**Exhibit 3.7-19**) decreases from 19.9 (No Action) to 19.2 (Alternative 2). This reduction reflects the "distributed & balanced" growth pattern placing more new housing and jobs in established centers and along frequent transit corridors, for example the Center City and the Division Street areas, which would shorten average trip lengths. It also reflects slightly lower job growth than Alternative 1 and Alternative 3, more similar to the current jobs/housing balance.

Exhibit 3.7-19. Alternative 1 (No Action) and Alternative 2 VMT per Capita

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

Sources: SRTC, Fehr & Peers, 2025

Relative to No Action, Alternative 2 is expected to produce minimal shifts in mode share (**Exhibit 3.7-20**) with slightly higher walk share and the same transit and bike shares. SOV trips would stay the same compared to No Action, and HOV trips would decrease slightly.

Exhibit 3.7-20. Mode Share – Alternative 2

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

Sources: SRTC, Fehr & Peers, 2025

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

Finding

Based on the thresholds of significance used for this EIS, no significant impact to mode share or VMT is expected under Alternative 2.

Safety

At the planning scale, safety and exposure to conflicts can be evaluated using total VMT and VMT per capita for context. These metrics come from the regional model and are used to quantify the miles traveled. VMT is used as a measure for exposure because an increase in miles driven could result in more total crashes, even if the rate of crashes per miles driven remains the same.

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

Finding

Total VMT and VMT per capita with Alternative 2 is expected to decrease relative to No Action; therefore, Alternative 2 does not result in a significant safety impact at the planning scale due to the reduced exposure and corresponding potential reduction in the number of severe and fatal crashes.

Vehicle Network (Intersections)

As shown in **Exhibit 3.7-21,** 17 of 22 study intersections are expected to meet their applicable LOS standard with Alternative 2, an improvement over No Action, where 16 of 22 met the standard. The five intersections that are not expected to meet their LOS standard under Alternative 2 are shown in **bold**. The vehicle network serves all vehicle types including transit and freight, which will be discussed within this subsection.

Exhibit 3.7-21. Spokane Intersection LOS – Alternative 2

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

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

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

Compared to No Action, the SR 291/W Francis Avenue and N Alberta Street intersection is expected to operate with lower delay such that it would meet its LOS D standard (No Action LOS E), and SR 290/E Trent Avenue and N Hamilton Street would operate at LOS E rather than LOS F (still failing to meet the standard of LOS D).

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

Finding

Alternative 2 does not introduce new significant intersection impacts relative to No Action with no additional locations failing to meet LOS standards and with delays increasing by less than 5 seconds. Therefore, no significant intersection impacts are identified under Alternative 2.

Transit and Freight

Under Alternative 2, no significant intersection impacts are identified relative to the No Action alternative. The intersection of US 2/Sunset Highway and Flint Road in the West Plains remains at LOS F and delay increases incrementally by 3 seconds versus the No Action alternative. This increase is below the Action alternative threshold of 5 seconds. The remaining intersections either maintain or improve LOS/delay relative to No Action.

Finding

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

Alternative 3: Center City and Regional Hubs

This section summarizes the model results for Alternative 3 and the impacts expected based on the thresholds of significance stated in **Section 3.7.2** *Thresholds of Significance*.

VMT per Capita and Mode Share

With Alternative 3, total vehicle miles traveled in Spokane are expected to be 5,916,000 on an average weekday, which is slightly below the VMT with No Action and slightly higher than VMT with Alternative 2. This translates to a VMT per capita (**Exhibit 3.7-22)** decrease from 19.9 (No Action) to 19.8 (Alternative 3). This slight decrease reflects growth focused in the Center City and select regional hubs, which brings more trips closer to destinations and frequent transit routes. However, although Alternative 3 places more housing and jobs in the Center City than Alternative 2, it also assumes continued employment growth in industrial hubs, most notably the West Plains/Airport area and Northeast/Hillyard, which increases trips and yields higher total VMT than Alternative 2.

Exhibit 3.7-22. Alternative 1 (No Action) and Alternative 3 VMT per Capita

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

Sources: SRTC, Fehr & Peers, 2025

Relative to No Action, Alternative 3 is expected to produce the same modest shifts in mode share (**Exhibit 3.7-23**) as Alternative 2: slightly higher walk share and slightly lower HOV share with the other mode shares remaining the same as No Action.

Exhibit 3.7-23. Mode Share –Alternative 3

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

Sources: SRTC, Fehr & Peers, 2025

Compared to No Action, Alternative 3 is expected to have a slight shift to from shared-ride vehicle trips to active modes with approximately 88,600 walking trips and 17,000 biking trips per day, which is about 3,100 more walk trips and 400 more bike trips than No Action.

Finding

Based on the thresholds of significance used for this EIS, no significant impact to mode share or VMT is expected under Alternative 3.

Safety

At the planning scale, safety and exposure can be evaluated using total VMT and VMT per capita for context. These metrics come from the regional model and are used to quantify the miles traveled. VMT is used as a measure for exposure because an increase in miles driven could result in more total crashes even if the rate of crashes per miles driven remains the same.

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

Finding

Total VMT and VMT per capita with Alternative 3 is expected to decrease relative to No Action; therefore, Alternative 3 does not result in a significant safety impact at the planning scale due to the reduced exposure and corresponding potential reduction in the number of severe and fatal crashes.

Vehicle Network (Intersections)

As shown in **Exhibit 3.7-24,** 17 of 22 study intersections are expected to meet their applicable LOS standard with Alternative 3, an improvement over No Action. The five intersections that are not expected to meet their LOS standard under Alternative 3 are shown in **bold**.

Exhibit 3.7-24. Spokane Intersection LOS – Alternative 3

Study Intersection	LOS Standard	2046 Alt 1 (No Action) LOS	2046 Alt 3 LOS
S Hatch Rd and E 57th Ave (One-way stop control)	E	**F**	***F***
S SE Blvd and E 29th Ave	E	D	*D*
S Grand Blvd and E 29th Ave	E	C	*C*
N Havana St and E Sprague Ave	E	E	*D*
N Napa St and E Sprague Ave	E	C	*C*
SR 290/E Trent Ave and N Hamilton St	D	**F**	***E***
US2/S Division St and E Sprague Ave*	F	C	*C*
US 2/N Ruby St and E Indiana Ave*	D	D	*D*
US 2/N Division St and W Buckeye Ave/E North Foothills Dr	D	C	*C*
US 2/N Division St and Wellesley Ave	D	**F**	***F***
US 2/N Division St and W Francis Ave*	D	**E**	***E***
US 2/N Newport Hwy and E Holland Ave	D	D	*D*
W 3rd Ave and S Monroe St	F	B	*B*
N Maple St and W Boone Ave	E	C	*C*
E Mission Ave and N Hamilton St	E	D	*E*
N Market St and E Euclid Ave	E	D	*D*
N T J Meenach Dr and W Northwest Blvd*	E	E	*D*
N Ash St and W Wellesley Ave	E	C	*C*
E Wellesley Ave and N Haven St*	E	E	*E*
N Market St and E Francis Ave	E	D	*D*
SR 291/W Francis Ave and N Alberta St	D	**E**	*D*
US2/W Sunset Hwy and Flint Rd	D	**F**	***F***

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

Compared to No Action, SR 291/W Francis Avenue and N Alberta Street improves to meet LOS standard, and SR 290/E Trent Avenue and N Hamilton Street improves from LOS F to LOS E (failing to meet the standard of D).

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

Finding

Alternative 3 does not introduce significant intersection impacts relative to No Action with no new locations exceeding LOS thresholds and with delay improving incrementally. Therefore, no significant intersection impacts are identified under Alternative 3.

Transit and Freight

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

Finding

For Alternative 3, no intersection impacts are identified compared to the No Action alternative, so relative transit and freight performance would be maintained.

Preferred Alternative

NOTE: *Analysis for the Preferred Alternative was added below with the Final EIS.*

This section summarizes the model results for the Preferred Alternative and the impacts expected based on the thresholds of significance stated in **Section 3.7.2** *Thresholds of Significance*.

VMT per Capita and Mode Share

With the Preferred Alternative, total vehicle miles traveled in Spokane are expected to be 5,717,000 on an average weekday, which is lower than all other alternatives. This translates to a VMT per capita (**Exhibit 3.7-22)** decrease from 19.9 (No Action) to 19.1 (Preferred Alternative). This decrease reflects growth focused in the Center City, select regional hubs, and along corridors with frequent transit service.

Exhibit 3.7-25. Alternative 1 (No Action) and Preferred Alternative VMT per Capita

	Existing (2024)	2046 Alt 1 (No Action)	2046 Preferred Alternative
VMT per Capita	17.9	19.9	*19.1*

Sources: SRTC, Fehr & Peers, 2026

Relative to No Action, the Preferred Alternative is expected to produce the same modest shifts in mode share (**Exhibit 3.7-23**) as Alternatives 2 and 3: slightly higher walk share and slightly lower HOV share with the other mode shares remaining the same as No Action.

Exhibit 3.7-26. Mode Share – Preferred Alternative

Mode	2046 Alt 1 No Action	2046 Preferred Alternative
Drive alone (SOV)	50.3%	*50.3%*
Shared ride (HOV)	39.5%	*39.3%*
Transit	1.2%	*1.2%*
Walk	7.5%	*7.7%*
Bike	1.5%	*1.5%*

Sources: SRTC, Fehr & Peers, 2025

Compared to No Action, the Preferred Alternative is expected to have a slight shift from shared-ride vehicle trips to active modes with approximately 87,200 walking trips and 16,800 biking trips per day, which is about 1,700 more walk trips and 200 more bike trips than No Action.

Finding

Based on the thresholds of significance used for this EIS, no significant impact to mode share or VMT is expected under the Preferred Alternative.

Safety

At the planning scale, safety and exposure can be evaluated using total VMT and VMT per capita for context. These metrics come from the regional model and are used to quantify the miles traveled. VMT is used as a measure for exposure because an increase in miles driven could result in more total crashes even if the rate of crashes per miles driven remains the same.

Under the Preferred Alternative, total VMT and VMT per capita are lower than No Action. Compared to No Action, the corresponding reduction in VMT and VMT per capita translates into reduced exposure on the transportation network and a potential reduction in the number of severe and fatal crashes.

Finding

Total VMT and VMT per capita with the Preferred Alternative is expected to decrease relative to No Action; therefore, the Preferred Alternative is not expected to result in a significant safety impact due to the reduced exposure and corresponding potential reduction in the number of severe and fatal crashes.

Vehicle Network (Intersections)

The regional demand modeling results for the Preferred Alternative were compared at a high level against Alternative 1 (No Action). The analysis shows that the Preferred Alternative would have slightly less demand volume at study intersections than Alternative 1, which means all locations would generally experience a decrease in vehicular delay. Vehicle operational performance was calculated at each location that did not meet the LOS standard in Alternative 1.

As shown in **Exhibit 3.7-24,** 5 of 22 study intersections are not expected to meet their applicable LOS standard with the Preferred Alternative, an improvement over No Action. The five intersections that are not expected to meet their LOS standard under the Preferred Alternative are shown in **bold**.

Exhibit 3.7-27. Spokane Intersection LOS – Preferred Alternative

Study Intersection	LOS Standard	2046 Alt 1 (No Action) LOS	2046 Pref Alt LOS
S Hatch Rd and E 57th Ave (One-way stop control)	E	**F**	***F***
SR 290/E Trent Ave and N Hamilton St	D	**F**	***E***
US 2/N Division St and Wellesley Ave	D	**F**	***F***
US 2/N Division St and W Francis Ave*	D	**E**	***E***
SR 291/W Francis Ave and N Alberta St	D	**E**	*D*
US2/W Sunset Hwy and Flint Rd	D	**F**	***E***

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

Compared to No Action, SR 291/W Francis Avenue and N Alberta Street is expected to improve to meet the LOS standard, and both SR 290/E Trent Avenue and N Hamilton Street and US 2/W Sunset Hwy and Flint Rd are expected to improve from LOS F to LOS E (failing to meet the standard of D).

The remaining locations that could fail to meet the standard under the Preferred Alternative are S Hatch Road and E 57th Avenue, US 2/N Division Street and W Wellesley Avenue, and US 2/N Division

Street and W Francis Avenue. At these intersections, delay is expected to incrementally improve compared to the No Action alternative.

Finding

The Preferred Alternative does not introduce significant intersection impacts relative to No Action with no new locations expected to exceed LOS thresholds and delay expected to improve incrementally. Therefore, no significant intersection impacts are identified under the Preferred Alternative.

Transit and Freight

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

Finding

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

Summary of Impacts

Exhibit 3.7-25 summarizes impact findings across the alternatives. The purpose of this programmatic EIS is to disclose how potential land use changes proposed in the Action alternatives may affect the transportation system relative to what would occur with currently adopted designations and policies (the No Action alternative). Accordingly, the impacts of each Action alternative are assessed against the performance of No Action. ~~Impacts~~ In general, locations that would operate below the LOS standard ~~expected to occur as a result of~~under the No Action alternative are also expected to operate below the LOS standard under the Action alternatives., However, none of ~~even if~~ the Action alternatives ~~do not~~are expected to result in additional significant impacts beyond what would occur with the No Action alternative.

Exhibit 3.7-28. Summary of Significant Impacts

Impact Type	Alternative 1 — No Action	Alternative 2	Alternative 3	Preferred Alternative
Pedestrian Network	None	None	None	None
Bicycle Network	None	None	None	None
Transit	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action	No additional impacts beyond No Action

Impact Type	Alternative 1 — No Action	Alternative 2	Alternative 3	Preferred Alternative
Safety	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action	No additional impacts beyond No Action
VMT per Capita	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action	No additional impacts beyond No Action
Mode Share	None	None	None	None
Vehicle Network (Intersection LOS)	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action	No additional impacts beyond No Action
State Facilities (Segment V/C)	None	None	None	None
Freight	Significant Impact	No additional impacts beyond No Action	No additional impacts beyond No Action	No additional impacts beyond No Action

NOTE: The Preferred Alternative was added to the figure above with the Final EIS.
Source: Fehr & Peers, 2025

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

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

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

Maximum Development Scenarios

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

Both the No Action and Preferred Alternatives have greater capacity for housing and population than the growth expected in the 20-year period, which is based on allocations of growth under the State OFM's medium (most likely) forecast. Under maximum development, housing growth would be greater than the 20-year housing growth targets under the No Action Alternative (39% housing capacity above

target) and Preferred Alternative (63% of housing capacity above targets). Considering the differences in land capacity, under the maximum development scenarios, the Preferred Alternative could increase the capacity for housing in Future Land Use Change areas (**Chapter 2, Exhibit 2.4-20**) above the No Action Alternative by 17% and associated population by 14%, largely along frequent transit corridors and in already developed locations. While greater in growth, these development locations would support transit use and offset VMT. Transportation systems require local and regional coordination and monitoring – local plans must be consistent with regional plans (Horizon 2050) which in turn must be consistent with State transportation plans in order to receive federal funding and be consistent with GMA. SRTC coordinates with the county and cities on an ongoing basis for regional transportation planning and they plan ahead of the local jurisdictions (currently to 2050). SRTC updates their regional model with each Regional Transportation Plan Update. SRTC certifies each local government transportation plan per GMA.

The maximum potential development of either the No Action or Proposed Action Alternatives would not be feasible due to the current and planned capacity of local and regional infrastructure, but this level of development is not projected to occur in the 20-year planning period. Additionally, due to the strength of transportation concurrency requirements, growth is not permitted if levels of service are not met at the time of development or within six years.

3.7.3 Mitigation Measures

The focus of an EIS is to disclose the potential impacts of the Action alternatives rather than mitigate conditions under the currently adopted land-use planning (the No Action alternative). For the alternatives evaluated, the Action alternatives have no impact or no additional impact beyond the No Action Alternative.

This section identifies programmatic mitigation measures that the City of Spokane can apply to avoid or minimize transportation impacts across all alternatives. Measures are presented in three sections: projects and policies already incorporated in the plans; regulatory/committed tools that apply citywide regardless of alternative; and other potential mitigation measures.

Incorporated Plan Features

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

US 2/Division Street and NSC

US 2/Division Street is a north-south corridor that carries all modes of traffic. STA's Division Street BRT project will repurpose one lane in each direction for Business Access and Transit (BAT) lanes; however, the final project phase is planned to coincide with opening of the North Spokane Corridor (NSC), which will add new north-south freeway capacity for regional and local connectivity. Construction of the BRT project in phases is expected to maintain vehicle capacity, with completion of the NSC aiding in the transition of the Division Corridor towards a transit and local access context. From a freight

perspective, the NSC will aid access between I-90 and the Hillyard industrial area and provide a faster regional alternative to north-south arterials for freight traveling between Spokane and destinations to the north. The NSC will help serve growing demand among all alternatives; however it will not resolve congestion or localized constraints on the local network.

City Line and STA High-Performance Transit (HPT)

The City Line continues to provide frequent east–west service across central Spokane, which is coupled with improvements that make transit more accessible. STA aims to deliver six HPT corridors as part of STA Moving Forward, a voter approved initiative to expand regional service. HPT will provide additional passenger capacity and connectivity both within the City of Spokane and across Spokane County.

Pedestrian and Bike Master Plans

The City's Pedestrian Master Plan (2015) sets policies and actions to make Spokane more walkable, including a toolbox to guide sidewalk and crossing upgrades across the city. The Bicycle Master Plan (2017) and Bicycle Priority Network (2024) provide a strategy to expand safe bicycling for all residents, with policies and projects that build a connected, lower-stress system.

Vision Zero and Complete Streets

The City has adopted Vision Zero and formalized it via Council resolution, followed by a 2023 Action that sets strategies and monitoring for the reduction in serious and fatal crashes. Spokane's Complete Streets program requires streets to be safely accessible for all users, and a 2025 ordinance updated the code and added links to the Pedestrian Master Plan and Bicycle Priority Network.

Areas Not Subject to Infill Exemption (City Core Focus)

The City of Spokane is evaluating adoption of SEPA categorical exemptions for infill housing under RCW 43.21C.229. The potential exemption area ~~will be identified~~are proposed by walk access to major transit stops served by frequent and regular STA routes as shown in the **Chapter 6, Appendix E**. 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 in Phase 1 include Grandview/Thorpe, West Hills, Latah/Hangman, Five Mile Prairie, and North Indian Trail.

Draft Transportation Element and Appendices

The Draft Transportation Element addresses goals and policies and its Appendix contains the 20-year Draft Transportation Facilities Plan including planned multimodal improvements and a funding

strategy.[15] In addition, the City regularly prepares a six-year Comprehensive Street Program and is updating traffic impact fees as one local source of funding, and capacity projects. The Draft Transportation Element Appendix contains a VMT analysis memo identifying the most effective VMT reduction measures for the City including mixed use along transit corridors, infill development, missing middle housing, reducing parking requirements, implementing TDM, and increasing multimodal capacity. The Draft Transportation Facilities Plan and VMT analysis memo in the Appendix identify a realistic target of keeping VMT per capita at existing levels as a reasonable sign of progress for the Department of Commerce five-year check-in and reduced by 5% of existing VMT over the 20-year planning period. The City addresses monitoring metrics including VMT in its Draft Chapter 2 Community Indicators.

Regulations and Commitments

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

Spokane's transportation impact fee program links new development to delivery of transportation network improvements identified in the City's capital/impact-fee project lists. This program remains in place even if SEPA categorical exemptions for infill housing are adopted. Fees collected at permitting are restricted to eligible capacity and safety projects, so investments are made where growth occurs. Because the program is district-based, revenues generated in growth areas including designated infill areas can be directed to corridor and intersection improvements that support concurrency and mitigate impacts discussed within this EIS.

In summary, the SEPA categorical exemptions for infill housing in the Phase 1 area do not remove transportation impact fees, frontage improvement requirements, design standards, or the City's coordination with WSDOT and STA.

Other Potential Mitigation Measures

This section introduces a range of programmatic strategies that could be implemented to reduce the impact of the growth alternatives evaluated within this EIS.

[15] See: https://my.spokanecity.org/planspokane/chapter-review/.

Transportation Demand Strategies (TDM)

Transportation Demand Strategies (TDM) is one potential measure that is utilized to encourage carpooling, vanpooling, transit, walking, biking, and telework to reduce single-occupancy vehicle (SOV) trips and peak demand. Deployed citywide and regionally, these measures help mitigate congestion and aid state-facility performance, freight mobility, and transit reliability.

Spokane implements TDM through the regional Commute Trip Reduction (CTR) program, branded Commute Smart Northwest and administered by Spokane County. Consistent with Washington State law, employers with over 100 employees must implement a CTR program and work toward mode share goals. The City participates in and helps fund this regional program alongside local agency partners, while Spokane County's Commute Smart Northwest provides employer services and tools across the region. The City has adopted CTR goals through Spokane Municipal Code 15.01 to align with the regional TDM strategy and advance these goals at the local level.

The City's CTR Four-Year Plan Update (2025–2029) links mode shift to safety, access, and climate goals. Spokane targets employers, residents, and students with a mix of education, incentives, and resources to facilitate mode shift. Available tools include ride matching via CommuteFinderNW.com, employer and individual incentive programs, and a guaranteed/emergency ride home. These resources are available not only to large CTR programs but also to smaller employers.

A core feature of TDM is to make other travel options more attractive and less stressful. Through continued coordination with Spokane Transit Authority, the City is facilitating the implementation of High-Performance Transit corridors in order to make transit a reliable alternative to driving alone. In addition, the Pedestrian and Bike Master Plans aid in facilitating connectivity for people who choose to walk or bike.

Spokane has the framework and service platform to scale TDM strategies. Expanding employer and development-linked measures, incentives, and access can reduce drive-alone trips and help moderate impacts identified within this EIS.

TSMO and Signal Timing

Transportation Systems Management & Operations (TSMO) is a programmatic strategy that improves reliability with intelligent transportation systems (ITS) and operational refinements rather than major construction. Core tools include periodic signal retiming and coordination, refined phase/split/offset plans, protected–permissive turn phasing and right-turn overlaps, leading pedestrian intervals and updated pedestrian clearance, upgraded detection and, where appropriate, transit signal priority and queue jumps. Because these measures are relatively low-cost with lower overhead, they can be iterated as conditions change and paired with capital projects.

For the intersection of SR 290/E Trent Avenue and N Hamilton Street, the South Logan Transit-Oriented Development (TOD) Plan identifies signal tools such as signal phase adjustments and right-turn overlaps to maintain operations as the area develops. This EIS is consistent with that approach, and the same signal timing adjustments can be implemented and adjusted as volumes grow.

Complementary TSMO strategies including wayfinding and driver information to parallel routes like the adjacent Martin Luther King Jr Way corridor can help redistribute peak traffic and avoid oversaturation of the intersection . Together, these programmatic measures paired with ongoing monitoring and retiming can maintain operations as land-use activation occurs.

Agency Partnerships

WSDOT, Spokane Transit Authority (STA), Spokane County, and the Spokane Regional Transportation Council (SRTC) provide critical transportation facilities, services, data, and funding pathways for the City of Spokane. The City has a long history of working with these partners to expand multimodal access to and within Spokane, and continued coordination is essential to evolve the regional network.

For transit service, mitigating delay and improving speed and reliability will require close coordination with STA. For Division Street BRT, the City and STA will continue to work towards phasing and implementation for the transit corridor. The City will also coordinate with STA to enhance first and last-mile access improvements along transit routes.

Partnering with the County and other regional agencies on a unified TDM program leverages resources to provide a robust program with opportunities for targeted programs within the City.

On state facilities, Spokane will continue to partner with WSDOT to coordinate on critical regional corridors including I-90, US 2, US 195, SR 290, SR 291, and related ramp terminals and bridges.

3.7.4 Significant Unavoidable Adverse Impacts

Relative to No Action, the Action alternatives would maintain or incrementally improve mode share and have lower VMT per capita, which translates into slight improvements or no change in transit, freight, and safety performance. Implementing t~~T~~he Action alternatives would not cause any additional intersections to fall below standards, and for intersections that already fall below the LOS standard under No Action, the Action alternatives would add less than 5 seconds of average control delay relative to No Action. In addition, the Action alternatives would maintain all evaluated state facilities below a v/c ratio of 1.0 and would not degrade pedestrian or bicycle operations at the citywide scale.

Therefore, applying the thresholds in **Section 3.7.2**, ~~neither~~ none of the studied Action alternatives ~~is~~ are expected to result in a significant adverse transportation impact.

3.8 Public Services

This section describes current conditions for public services and analyzes changes in demand based on each alternative's level and location of growth. Public services analyzed in this section include police, fire and emergency medical services (EMS), schools, parks, libraries, and solid waste. An impacts analysis for environmental justice, as it relates to parks and emergency services access, is also included.

Thresholds of significance utilized in this impact analysis include:

- **Police/Fire/EMS** – Increased demand for police or fire and emergency that cannot be accommodated through regular planning and staffing processes.
- **Schools** – Increased public school enrollment and demand on capital facilities, and broadband that cannot be addressed through regular school planning processes.
- **Parks** – Decreased park level of service (LOS), as defined in the Spokane Parks Master Plan (acres of developed park land per 1,000 people, and percent of households that can reach a public park or school ground in 10-minute walk)
- **Libraries** – Recommended square feet per capita LOS not met, as defined in the City of Spokane Capital Facilities Plan
- **Solid Waste** – Collections per household per month that would result in major investments exceeding what is already planned.
- **Environmental Justice**
  - Growth in areas with existing health disparities would result in increased demand on emergency medical services and impact response times.
  - Growth in areas with high social vulnerability would result in greater pressure on existing parks and recreation services.

3.8.1 Affected Environment

Police

The Spokane Police Department (SPD) has 333 commissioned police officers and 91 full-time civilian staff members (City of Spokane, 2025). The City is authorized for 354 commissioned positions. Volunteers also provide support and completed more than 27,000 volunteer hours in 2023 (City of Spokane, 2025). SPD has several specialized teams, including a Violent Crimes Task Force, Special Investigative Unit, Stolen Property Enforcement and Recovery Unit, and SWAT (Spokane Police Department, 2024). There are four precincts and a police headquarters, as well as other administrative and support buildings (**Exhibit 3.8-2**).

Spokane currently employs 1.4 officers per 1,000 population (**Exhibit 3.8-1**). Staffing has been cited as a "critical issue" for the Spokane Police Department (City of Spokane, 2025). As of early 2024, the

department had only two vacancies to fill after hiring 34 officers in 2023 (Spokane Police Department, 2024). However, SPD has emphasized that the department is still approximately 200 officers short of the national average officers per thousand and demand for police services exceeds capacity. Calls for service increased 14% from 2022 to 2023, with an average of 295 calls with police response each day. SPD also emphasizes proactive policing and aims to increase it by 10% between 2025 and 2027.

Exhibit 3.8-1. Police Officers per 1,000 Population

Police Officers (2025)	Population (2025)	Officers per 1,000 population
333	234,700	1.4

Source: (City of Spokane, 2025), (BERK, 2025), (Washington Office of Financial Management, 2025)

SPD has a goal of answering 95% of calls within 15 seconds after being transferred from Spokane Regional Emergency Communications (SREC). This exceeds the national standard of answering 90% of calls within 15 seconds (City of Spokane, 2025). In 2023, SPD answered 97% of calls within 10 seconds and 99.8% of calls within 20 seconds (Spokane Police Department, 2024).

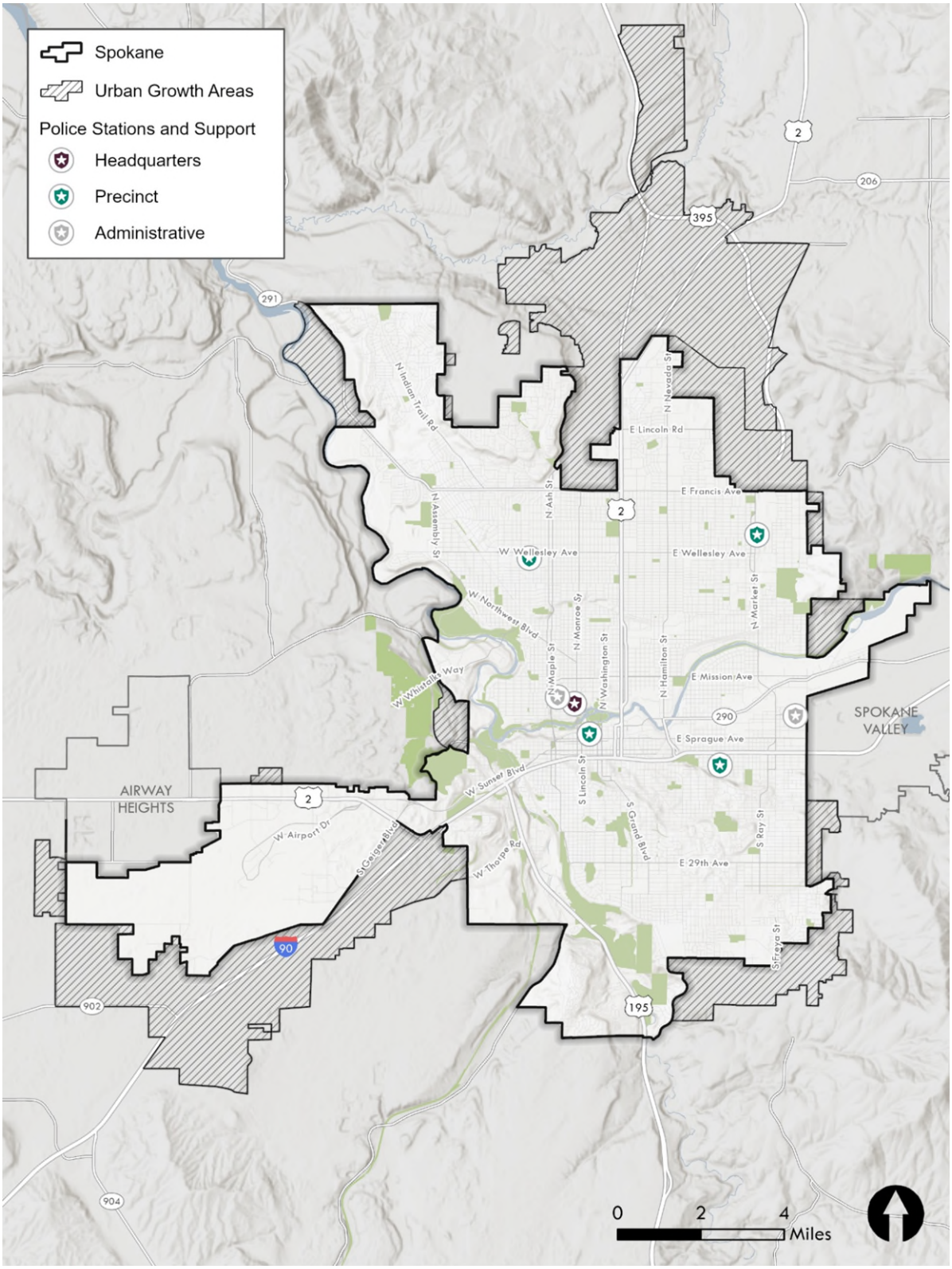
The City is moving to establish a new Emergency Communications Center in 2026 that will handle both fire and police calls.

The violent crime rate in Spokane is 7.0 per 1,000 residents and the property crime rate is 55.9 per 1,000 residents (Spokane Trends, 2023). Both rates have decreased over the past five years.

Key priorities for SPD through 2026 include:

- Implementing a comprehensive strategy to reduce violent gun crime.
- Deploying holistic, all-city strategies to address quality of life issues, including homelessness and drug use.
- Exploring community-centered policing strategies to build public trust.
- Increasing employee wellness strategies and programmatic opportunities.
- Increasing employee recruitment and retention.
- Deploying evidence-based practices to achieve organizational excellence. (City of Spokane, 2025)

Exhibit 3.8-2. Spokane Police Stations



Source: (City of Spokane, 2025; BERK, 2025)

Northwest Spokane

The Detective's Building and the Northwest Police Precinct are located in Northwest Spokane.

Northeast Spokane

The Northeast Police Precinct is located in Northeast Spokane.

Division Corridor

None of the Police Department buildings are located in the Division Corridor. Other buildings are nearby in Center City, Northwest Spokane, and Northeast Spokane.

Center City

Police Headquarters and the Downtown Police Precinct are located in Center City.

South Spokane

The South Police Precinct is located in South Spokane.

West Plains

None of SPD's facilities are located in West Plains.

Fire/EMS

Spokane is served by the Spokane Fire Department (SFD), which provides fire response services and EMS. The Department has 376 budgeted full-time fire and EMS staff, including 350 uniform staff and 25.63 civilian staff. This equals approximately 1.5 uniform staff per 1,000 Spokane residents. SFD hired approximately 39 new firefighters in 2023 and four in 2024 (Spokane Fire Department, 2024; Spokane Fire Department, 2023). There is one Fire Chief, one Assistant Fire Chief, three Deputy Chiefs, and three Staff Battalion Chiefs. SFD operates 16 fire stations throughout the city (**Exhibit 3.8-3** and **Exhibit 3.8-4**) organized into a North and a South Battalion.

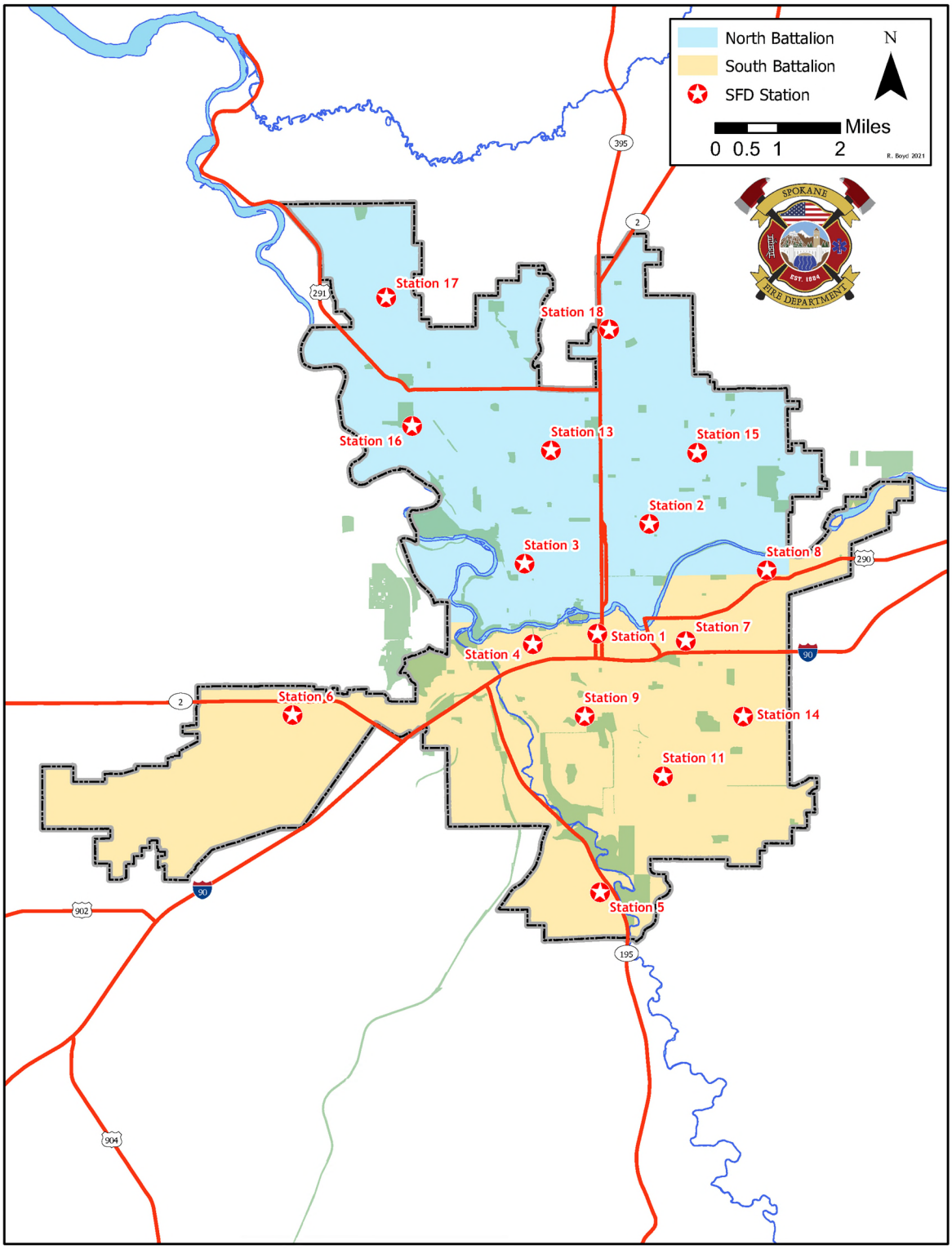
In addition to fire and EMS, the Department has several specialty teams. This includes hazardous materials response, water rescue, and a rescue task force for high-threat scenarios. SFD also provides prevention education and training (Spokane Fire Department, 2025). A Logistics Division and an Information Technology team support the Department's functions, and a Wildland Resource Planner works on Wildland Fuels Reduction and prevention.

Exhibit 3.8-3. Fire Stations and Areas Served

Station	Areas Served	Percent of 2024 Responses
Station 1	Downtown, East Central, Rockwood	18%
Station 2	Logan, Gonzaga University	7%
Station 3	Emerson/Garfield, West Central	10%
Station 4	Browne's Addition, Downtown Spokane, Sunset Hill, lower South Hill, Peaceful Valley, Grandview	9%
Station 5	Latah Valley, Hangman	1%
Station 6	West Plains, Spokane International Airport	1%
Station 7	East Central	5%
Station 8	East Central	4%
Station 9	Manito, Comstock	2%
Station 11	Lincoln Heights	6%
Station 13	Shadle, Five Mile Prairie, Northtown, Garland	7%
Station 14	Lincoln Heights, East Central, Southgate	4%
Station 15	Hillyard, Bemiss	8%
Station 16	Audubon/Downriver, Northwest	4%
Station 17	Indian Trail	2%
Station 18	Shiloh Hills	12%

Source: (Spokane Fire Department, 2025; Spokane Fire Department, 2024)

Exhibit 3.8-4. Spokane Fire Department Stations



Source: (Spokane Fire Department, 2025)

In 2024, SFD had a total of 54,279 responses, of which 88% were EMS and rescue incidents, 2% were fire incidents, and 10% were other service calls for assistance. The Department's Insurance Rating is currently a Class 3, after being downgraded in 2000 due to reductions in fire stations, staffed apparatus, and on-duty personnel (Spokane Fire Department, 2024). SFD currently has a goal to achieve a Class 2 rating.

As described above in **Police**, fire and police calls will move from SREC to a new City Emergency Communications Center in 2026.

The Department has the following objectives for response times (Spokane Fire Department, 2024):

- **Turnout Time: 90 seconds, 90% of the time.** In 2024, average turnout time was two minutes and 25 seconds.
- **Response Time (First Arriving Apparatus): 8 minutes and 30 seconds, 90% of the time.** In 2024, average response time was five minutes and 29 seconds.
- **Structure Fire Response Time: 11 minutes, 90% of the time.** The Department met this standard for 97% of structure fires in 2024.
- **Structure Fire Travel Time: First unit to arrive within 7 minutes, 90% of the time.** In 2024, average travel time was two minutes and 25 seconds.

Northwest Spokane

Northwest Spokane is served by the North Battalion and includes Stations 3, 13, 16, and 17.

Northeast Spokane

Northeast Spokane is served primarily by the North Battalion, with some overlap with the South Battalion, and includes Stations 2, 7, 8, 15, and 18.

Division Corridor

The Division Corridor is served primarily by the North Battalion, with some overlap with the South Battalion, and overlaps with Stations 1 and 18.

Center City

Center City is served by both the North and South Battalions and includes Station 1.

South Spokane

South Spokane is served by the South Battalion and includes Stations 4, 5, 7, 9, 11, and 14.

West Plains

West Plains is served by the South Battalion and includes Station 6.

Schools

School districts serving Spokane include Spokane Public Schools, Mead School District, and Cheney Public Schools (**Exhibit 3.8-5**).

Spokane Public Schools (SPS) is the main public school provider in Spokane. There are 34 elementary schools, nine middle schools, five high schools, and multiple option schools in the district (Spokane Public Schools, 2025).

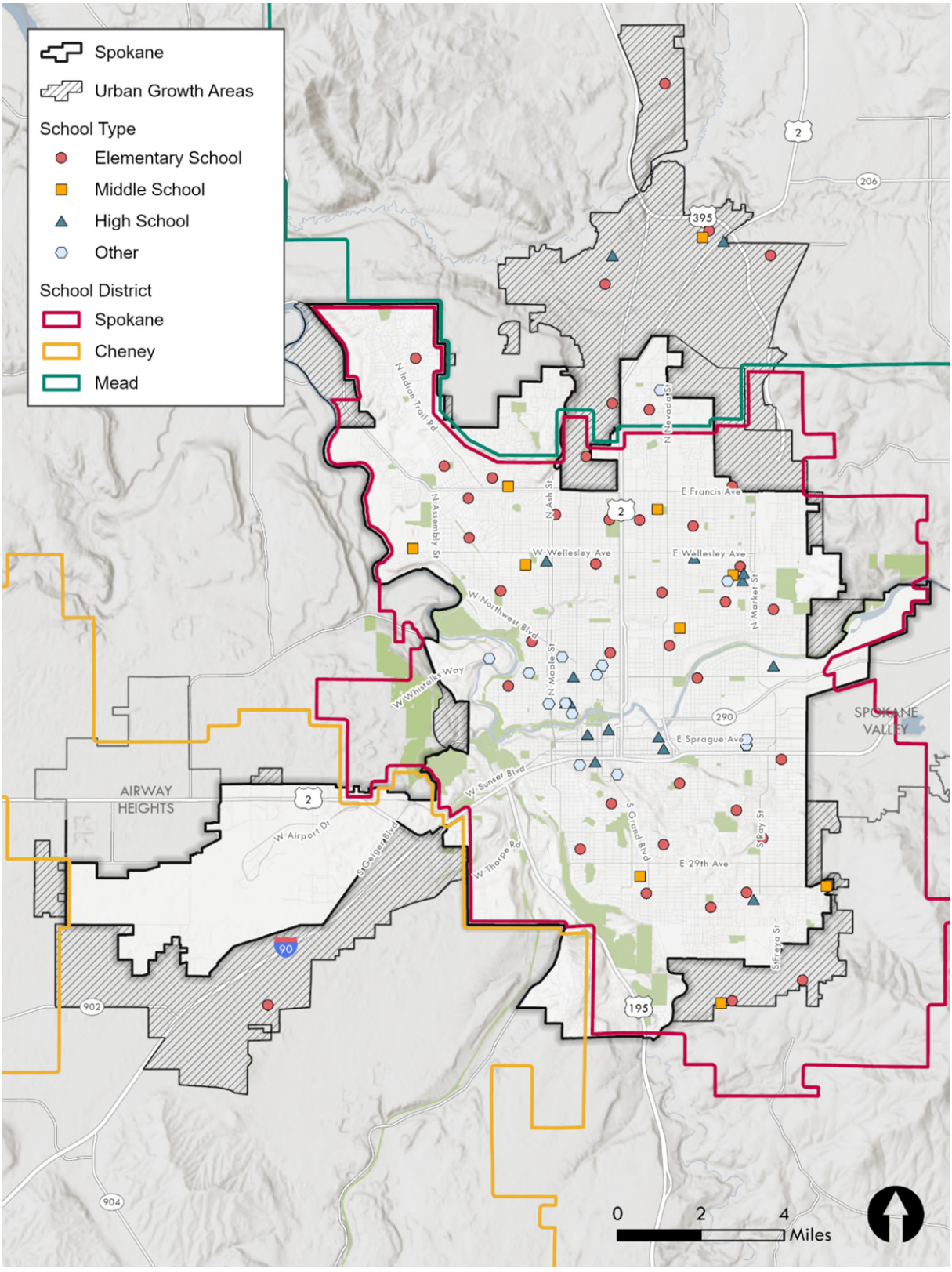
The school district serves almost 30,000 students, including 12,000 elementary school students, 6,000 middle school students, 8,000 high school students, 3,000 students in special schools, and 800 students attending virtual classes. 60% of SPS students are in households with low incomes (Washington OSPI, 2024). Only 68% of students attended 90% or more of the school days in the 2023-2024 school year. For comparison, this is lower than Seattle Public Schools, where 77% of students attended 90% or more days. The average class size is 19.1 students. RCW 28A.150.100 requires 46 instructional staff per 1,000 students, or a ratio of approximately one teacher per 21.7 students (Revised Code of Washington, 2022). The City's Capital Facilities Plan specifies a level of service standard of one teacher per 19 students (City of Spokane, 2017). SPS buildings total approximately 5,300,000 square feet.

Prior capacity issues observed in 2015 capital planning have been addressed in part by additional middle school space added through a 2018 bond measure. Based on births within the school district, SPS projects that in 5 years it will serve approximately 600 fewer students overall than in the 2024-2025 school year, with decreases in the number of elementary and middle school students and a slight increase in high school students.

Major future projects, pending voter approval of a 2025 bond, include rebuilding of Adams and Madison elementary schools, modernizing parts of North Central High School and Garry Middle School, and establishing a new Trades High School (Spokane Public Schools, 2025). Other improvements are also planned for various schools throughout the district. SPS also partners with City of Spokane Parks and Recreation through the Together Spokane Initiative, which relies on both the SPS bond and the 2025 Parks levy passing. The 2018 bond program included a total of $553 million for school projects, including the replacement of three middle schools.

Mead School District and Cheney Public Schools serve small portions of the city, with Mead School District covering some northern areas and Cheney Public Schools covering a small area around Eagle Ridge. Mead School District has a total of 17 schools serving 10,800 students and an average student to teacher ratio of 17.89. Cheney Public Schools has a total of 12 schools serving 5,700 students and an average student to teacher ratio of 16.7.

Exhibit 3.8-5. Schools and Districts in Spokane



Source: (City of Spokane, 2025; BERK, 2025)

To understand student growth in relation to population growth, the current ratio of students to housing units is shown in **Exhibit 3.8-6**. SPS and Cheney Public Schools have a similar average number of students per housing units, while Mead School District has a higher ratio.

Exhibit 3.8-6. Ratio of Students to Housing Units

School District	Students (2024-2025)	Housing Units (2024)	Students per Housing Unit
Spokane School District	29,690	108,297	0.27
Mead School District	10,761	23,742	0.45
Cheney Public Schools	5,702	18,738	0.30

Source: (Washington OFM, 2024; Washington OSPI, 2024)

Northwest Spokane

SPS facilities in Northwest Spokane include three high schools, two middle schools, and 11 elementary schools. Mead School District serves a small portion of Northwest Spokane though no schools are located within the boundaries.

Northeast Spokane

SPS facilities in Northeast Spokane include three high schools, three middle schools, and 12 elementary schools. Mead School District also serves a small area on the north end and has one elementary school within the boundaries.

Division Corridor

SPS schools in the Division Corridor include two elementary schools.

Center City

SPS schools in Center City include one high school (Lewis and Clark High School).

South Spokane

South Spokane includes one SPS high school, three middle schools, and 10 elementary schools. A small portion at the south end is served by Cheney School District though no schools are located within the boundaries.

West Plains

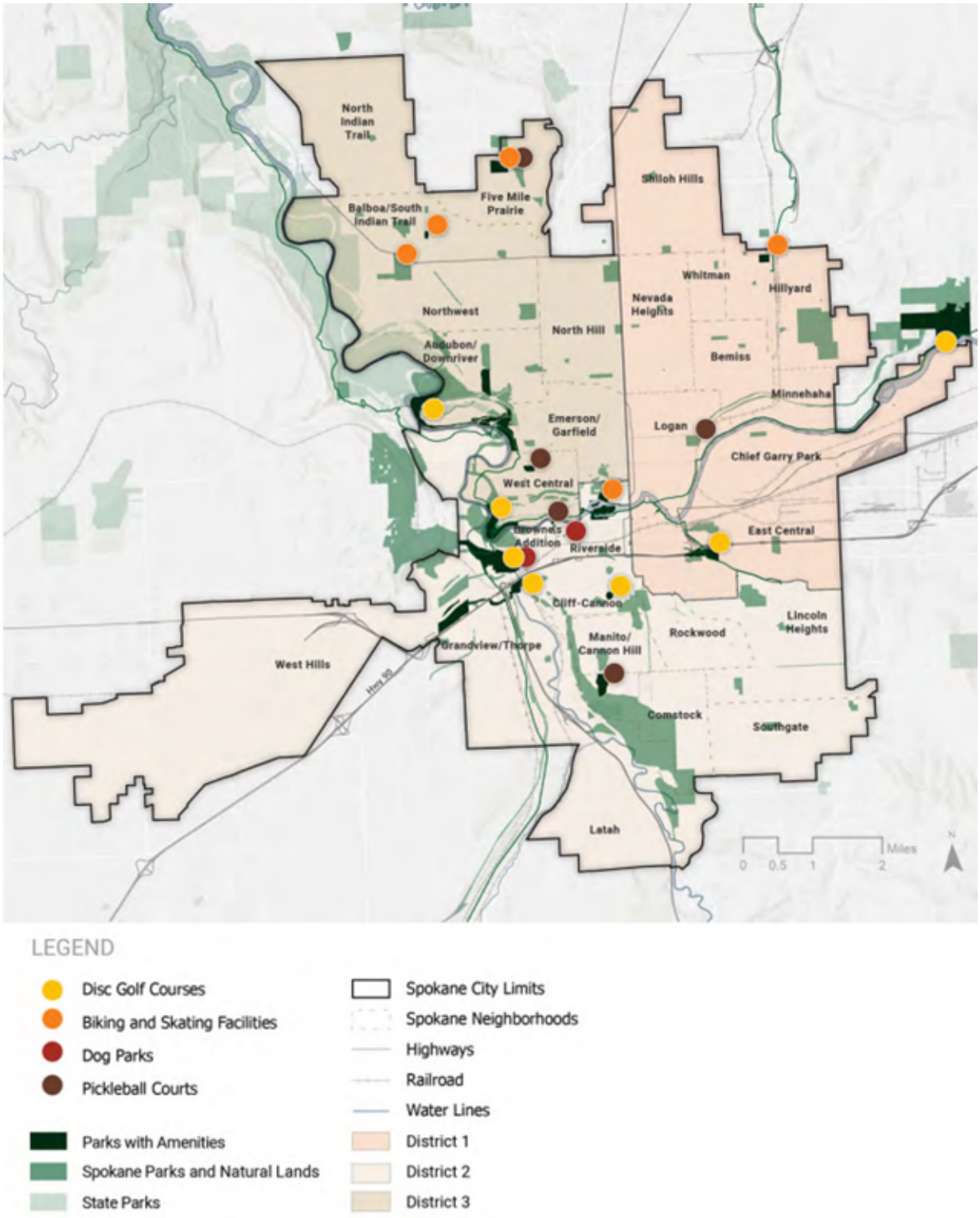
Cheney School District serves West Plains, though no schools are located within the boundaries.

Parks

The City of Spokane has approximately 130 miles of trails and 3,800 acres of parks, including 1,600 acres of natural lands (City of Spokane, 2022). Within the City's more than 87 parks, the City provides a range of facilities, including playgrounds, sports fields, sports courts, community gardens, formal gardens, dog parks, splash pads, and pools, and unprogrammed field areas. The City of Spokane also owns and manages three sports complexes, four public golf courses, six aquatic centers, and an arboretum. Natural lands provide opportunities for passive recreation and plant and animal habitat. Trails serve as corridors for pedestrian and bicycle use for both commuting and recreation. **Exhibit 3.8-7** shows the locations of City parks and amenities.

Other recreation providers in Spokane include Washington State Parks, the school district, and the YMCA, as well as private recreation providers.

Exhibit 3.8-7. Spokane Parks and Amenities



Source: City of Spokane GIS data 2021, Spokane County GIS Data

Source: (City of Spokane, 2022)

Exhibit 3.8-8. Parks Acreage

Classification	Acreage
Special Use Park	248
Community Park	297
Natural Lands	1,643
Golf Course	690
Regional Park	474
Neighborhood Park	274
Pocket Park	14
Parkway	196
Total	**3,863**

Source: (City of Spokane, 2022)

Exhibit 3.8-9. Trails Acreage

Classification	Mileage
Natural Trail (Single Track)	108
Paved Trail (Wider Track)	14
Sidewalk	8
Total	**130**

Source: (City of Spokane, 2022)

The Parks Department also provides recreational programming, including adult, youth, aquatic, community, arts, and outdoor programs. There are also Therapeutic Recreation Services programs to ensure residents with disabilities can participate.

Spokane currently provides 16.2 acres of park land per 1,000 people, including 5.8 acres of developed park land per 1,000 people (**Exhibit 3.8-10**). The neighborhoods of Shiloh Hills, Lincoln Heights, Southgate, Latah/Hangman, North Indian Trail, Five Mile Prairie, and Northwest were identified as areas with low access to parks within a 10-minute walkshed in the 2022 Spokane Parks and Natural Lands Master Plan.

Exhibit 3.8-10. Park Acres per 1,000

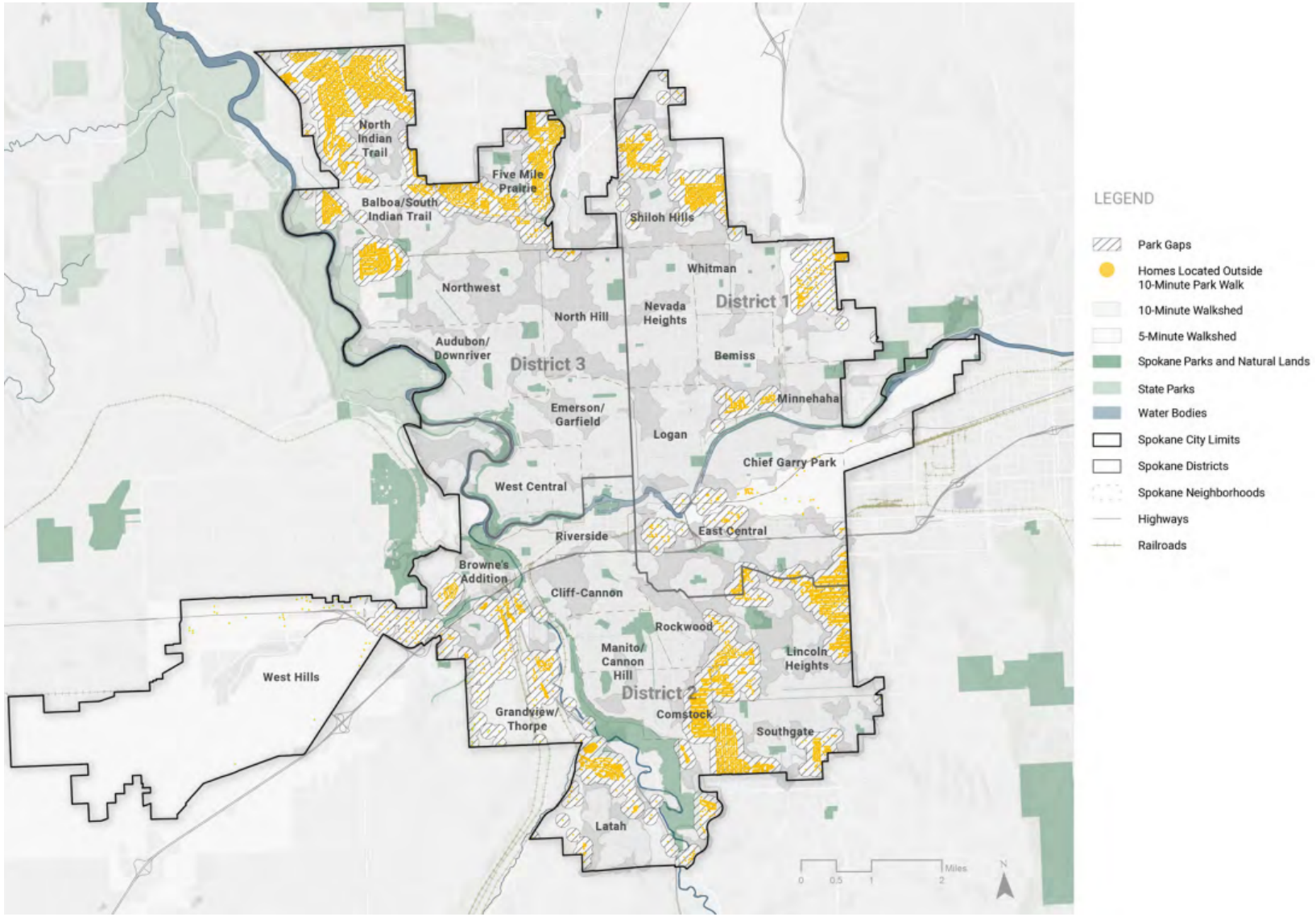
Park Classification	Number of Properties	Publicly Accessible Property Acres	Acres/1,000 population in 2020 (223,600)
Regional Park	3	474	2.1
Special Use Park	6	248	1.11
Golf Course	4	690	3.09
Community Park	12	297	1.33
Neighborhood Park	32	274	1.23
Pocket Park	13	14	0.06
Parkway	18	196	0.88
Natural Lands	17	1,643	7.25
Total	**105**	**3,836**	**17.2**
Total Excluding Golf Courses, Parkways, and Natural Lands	**82**	**1,307**	**5.8**

Source: (City of Spokane, 2022)

The 2022 Spokane Parks and Natural Lands Master Plan also found a need for more investment in a higher number of smaller projects and increased maintenance throughout the City rather than a large, singular project. Opportunities for improvement identified in the plan include:

- **Land**
  - Serving under-resourced areas of the city.
  - Reflecting the assets of the Inland Northwest.
  - Preserving natural areas.
- **Water**
  - Expanding aquatic facilities.
  - Activating the Spokane River.
  - Improving water use efficiency.
- **People**
  - Improving existing parks.
  - Building awareness of programs and facilities.
  - Improving the diversity of offerings.
  - Addressing conflicts between park users.
- **Legacy**
  - Maintaining and caring for the system.
  - Acquiring new funding sources and leveraging current assets.
  - Strategic acquisitions, partnerships, and real estate management.

Exhibit 3.8-11. Gaps in Park Access



Source: (City of Spokane, 2022)

Northwest Spokane

Northwest Spokane includes a variety of parks, including several properties along the Spokane River and the Downriver Golf Course. Riverside State Park also overlaps with Northwest Spokane. The 2022 Spokane Parks and Natural Lands Master Plan identified several gap areas for parks within a 10-minute walk on the northern end of Northwest Spokane, including North Indian Trail, Northwest, Five Mile Prairie, and Balboa/South Indian Trail.

Northeast Spokane

Parks in Northeast Spokane include various smaller properties, including Mission Park and Upriver Drive Parkway along the Spokane River, as well as the Esmeralda Golf Course and the Hillyard Senior Center. Park gap areas include parts of the Shiloh Hills, Hillyard, Bemiss, and East Central neighborhoods.

Division Corridor

Parks in the Division Corridor include Franklin Park and B A Clark Park. There are two park gap areas in the Division Corridor, including in Shiloh Hills and in East Central.

Center City

The major park in Center City is Riverfront Park, which includes properties on both sides of the Spokane River in Downtown. Park gap areas in Center City include several pockets in East Central.

South Spokane

A variety of parks are located in South Spokane, with the largest being the conservation properties on Latah Creek, High Bridge Park, and the Creek at Qualchan Golf Course. There are many park gap areas in South Spokane, including parts of the East Central, Lincoln Heights, Rockwood, Comstock, Southgate, Latah, Grandview/Thorpe, and Browne's Addition neighborhoods.

West Plains

Parks in West Plains are concentrated on the east side, as the Spokane International Airport covers much of the area to the west. Parks include Whittier Park, Finch Arboretum, and Indian Canyon Golf Course. There is a park gap area in West Plains on the eastern side as the golf course is not considered a park for this analysis.

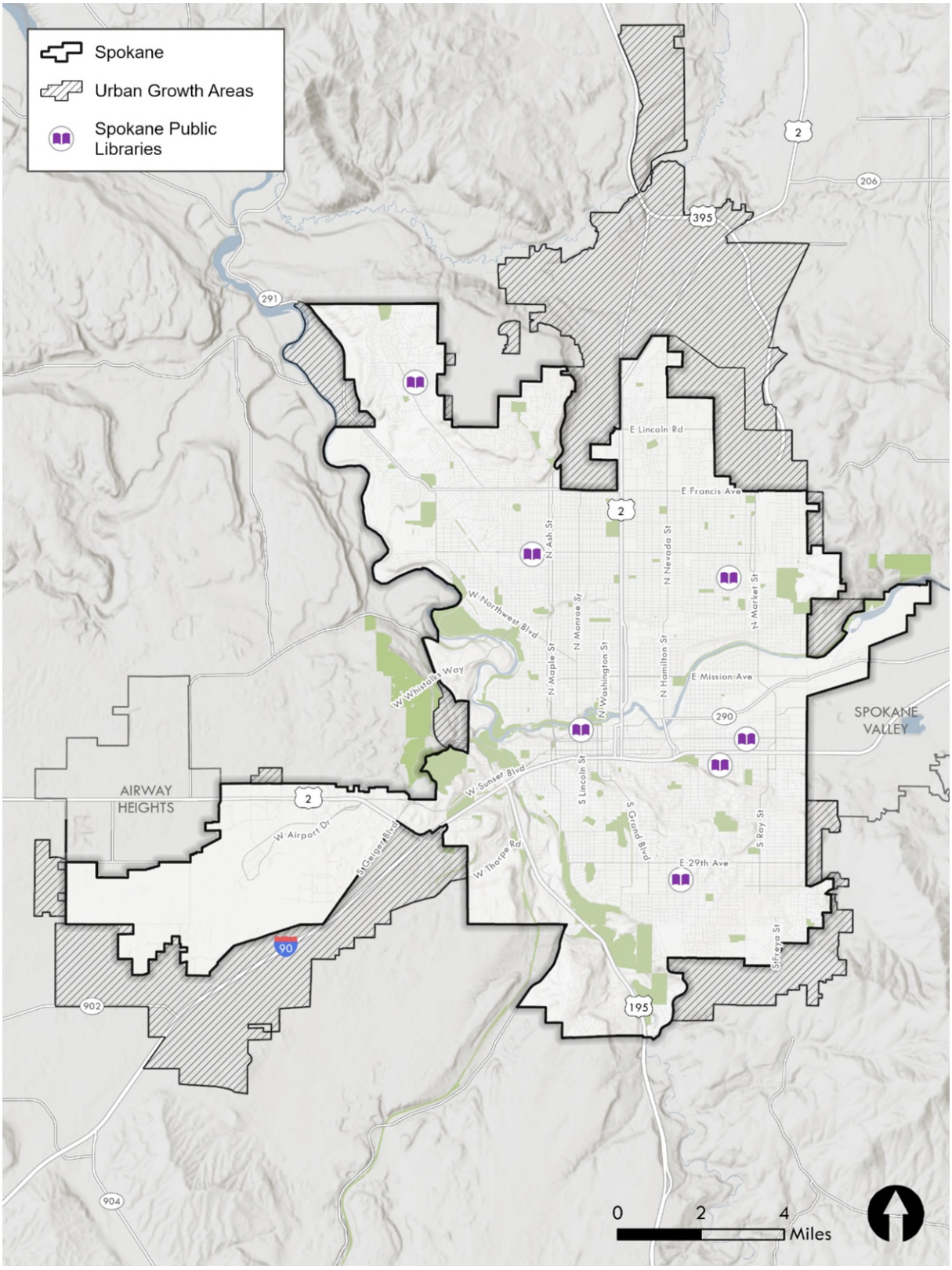
Libraries

Spokane Public Library is the library service provider in Spokane. There are seven library locations with millions of items in total, including books, movies, and music (**Exhibit 3.8-12**). There are also four library kiosks throughout the city where residents can check out and return items and pick up holds (Spokane Public Library, 2025). The library also provides events, printing, computer use, and meeting rooms (Spokane Public Library, 2025). In 2024, Spokane libraries had more than 1.2 million visitors (Spokane Public Library, 2024).

Substantial improvements to the library system have been completed recently, supported by a $77 million bond approved in 2018. Four new libraries opened in 2021, one opened in 2022, and two more opened by the end of 2023. According to the City's Capital Facilities Plan, the average life span of a library facilities is 20 to 30 years (City of Spokane, 2017). Voters also approved a levy in 2024, which is expected to raise $2.5 million in 2025, $2.52 million in 2026, and $2.55 million in 2027 ((The Spokesman Review, 2024).

Other libraries in the vicinity of Spokane include those managed by Spokane County Library District.

Exhibit 3.8-12. Libraries in Spokane



Source: (City of Spokane, 2025; BERK, 2025)

The library system, after the 2018 bond projects, now includes a total of 211,750 square feet. See **Exhibit 3.8-13**. With the estimated 2025 population of 234,700, this equals 0.9 square feet per resident. The recommended level of service is 0.813 square feet of library facilities per capita (City of Spokane, 2017). Other recommended levels of service include $50 of operating budget per capita, $7.50 of materials budget per capita, 15% of the operating budget for materials, 10.5 circulation per capita, and 60 unduplicated hours of operation per week.

The Capital Facilities Plan also specifies that, "if future development and population growth were to continue away from the city center and major corridors, the library would feel it necessary to build new facilities to serve these areas" (City of Spokane, 2017).

The 2025-2030 Capital Improvement Program has several projects planned related to library planning, all focused on improvements to information technology, such as fiber network upgrades and computing hardware (City of Spokane, 2025).

Exhibit 3.8-13. Libraries Square Footage

Library	Square Footage
Shadle Library	30,000
Central Library	117,000
Hillyard Library	12,725
Liberty Park Library	12,725
The Hive	13,700
Indian Trail Library	10,600
South Hill Library	15,000
Total	**211,750**

Sources: (Spokane Public Library, 2022) (Urban Land Institute, 2025) (MW Engineers, 2025) (MW Engineers, 2025)

Spokane Public Library's mission is to "inspire a thriving city through cultural and educational opportunities" (Spokane Public Library, 2025).

Strategic directions for the library include:

- Educate Our Citizens
- Become a Platform
- Be the Community's Partner

Northwest Spokane

Library locations in Northwest Spokane include Indian Trail Library and Shadle Park Library, as well as two kiosk locations in West Central and Five Mile.

Northeast Spokane

Northeast Spokane is served by Hillyard Library, The Hive, and Liberty Park Library. Spokane Community College Library, operated by the college, is also located in Northeast Spokane. Thrive International, a non-profit organization, is currently developing a new Spokane Public Library event and learning space and library kiosk as part of a mixed-income housing project.

Division Corridor

There are no libraries located specifically in the Division Corridor.

Center City

The Central Library serves Center City and is also a regional draw for its regular programming and events.

South Spokane

South Spokane is served by the South Hill Library and a library kiosk in Latah/Hangman. There is also a County library immediately to the south of the Southgate neighborhood.

West Plains

There are no library locations in West Plains.

Solid Waste

The City provides solid waste services, including residential and commercial services. This includes garbage, recycling, and an optional food and yard-waste collection (City of Spokane, 2025). Garbage and food and yard-waste is collected weekly, while recycling is collected every other week.

City activities include:

- Collecting solid waste.
- Operating the Valley Transfer Station, Colbert Transfer Station, and Northside Landfill.
- Collecting recyclables and yard waste.
- Administering contracts for processing of recyclables.
- Operating a moderate risk waste collection station at the Waste to Energy (WTE) Plant.
- Operating transfer activities between facilities.

- Administering permits for medical waste haulers.
- Completing illegal dumpling inspections and cleanup.
- Coordinating with the Spokane Regional Health District and City departments on facility inspections and enforcement.

Waste Management and Barr-Tech currently provide contracted recycling and compost processing.

The Waste to Energy Facility burns municipal solid waste to recover electricity. It handles 800 tons of solid waste per day, including waste from other parts of the county, and generates approximately 22 megawatts of electricity, which is enough to power 13,000 homes and earn up to $5 million in power sales each year (City of Spokane, 2025). The facility opened in 1991 to reduce amount of material sent to landfill and better protect the region's sole source aquifer. The operational life of the facility is expected to continue for the long-term, with maintenance costs of about $4 million per year (Spokane County, 2022).

The City participates in the County's solid waste planning process, which is formalized in the Comprehensive Solid Waste and Moderate Risk Waste Management Plan (Spokane County, 2022). The plan identifies a potential need for a future transfer station by 2039 in the main center part of Spokane or on the west side of the County. The 20-year capital improvements plan, however, does not include a new facility and emphasizes repairs and improvements to existing facilities. Solid waste capacity is shown in **Exhibit 3.8-14**. Recycling and composting facilities have adequate capacity for projected growth trends according to the County plan.

The City's level of service standard for solid waste and recycling is 4.33 collections per household per month (City of Spokane, 2017). The County's level of service is 800 pounds of solid waste per capita per year. The City is projected to collect 168,386 tons of solid waste from 70,164 customers in the year 2027. Spokane currently employs approximately 120 staff in its Solid Waste Department (City of Spokane, 2023)

Exhibit 3.8-14. Waste Facility Capacity

Facility	Capacity
Waste to Energy Facility	292,000 tons per year
Northside Landfill	1.5 million cubic yards total

Source: (Spokane County, 2022)

Northwest Spokane

The Northside landfill is located in Northwest Spokane. Waste from this area, and the rest of the city, is sent to the Waste to Energy Facility and recycling and compost processing facilities.

Northeast Spokane

There are no solid waste facilities located in Northeast Spokane. Waste from this area, and the rest of the city, is sent to the Waste to Energy Facility and recycling and compost processing facilities.

Division Corridor

There are no solid waste facilities located in the Division Corridor. Waste from this area, and the rest of the city, is sent to the Waste to Energy Facility and recycling and compost processing facilities.

Center City

There are no solid waste facilities located in Center City. Waste from this area, and the rest of the city, is sent to the Waste to Energy Facility and recycling and compost processing facilities.

South Spokane

The Southside Landfill is located south of South Spokane, in unincorporated Spokane County. Waste from this area, and the rest of the city, is sent to the Waste to Energy Facility and recycling and compost processing facilities.

West Plains

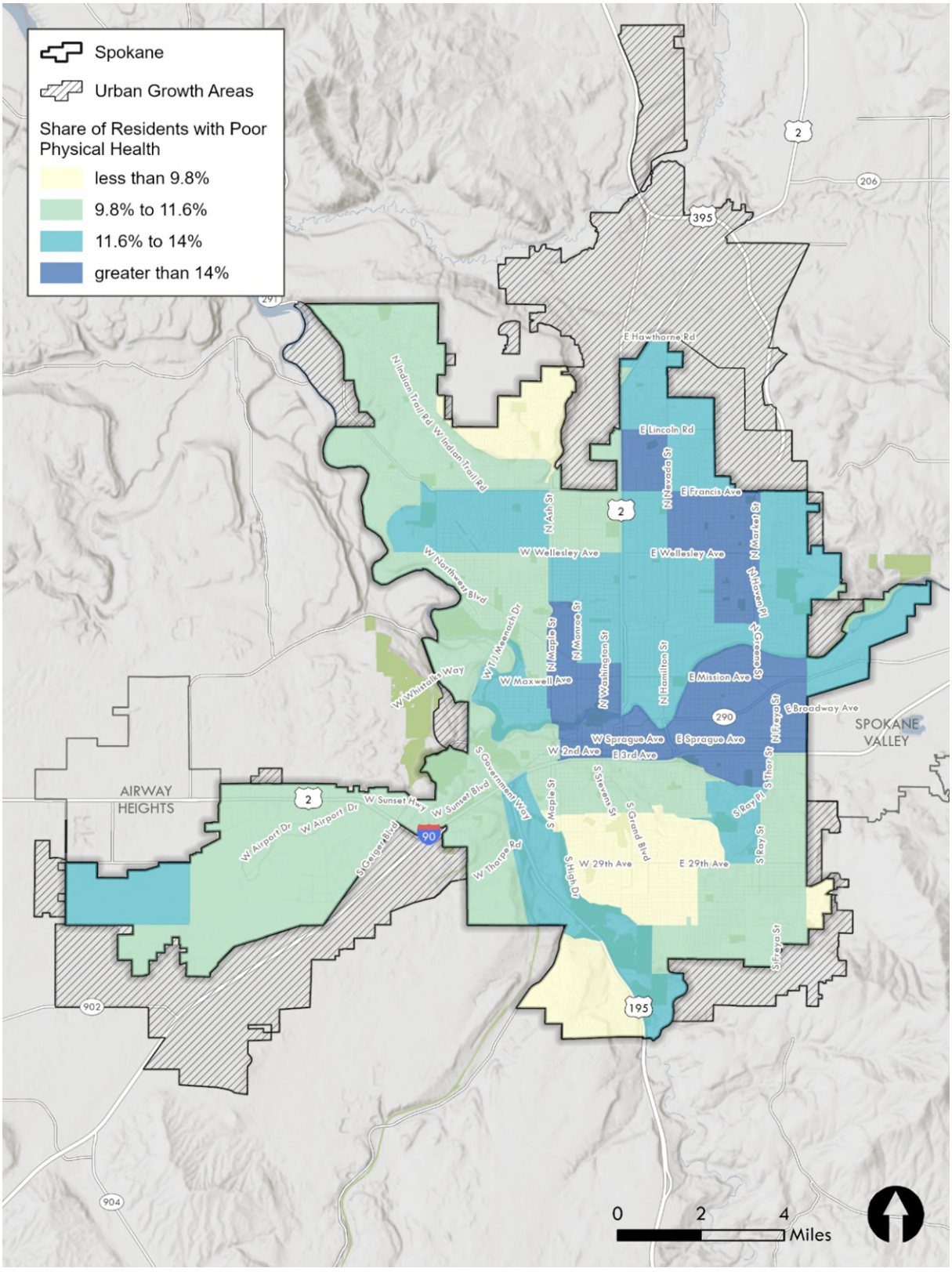
The Waste to Energy Plan is located in West Plains, near the Spokane International Airport. Waste from this area, and the rest of the city, is sent to the Waste to Energy Facility and recycling and compost processing facilities.

Environmental Justice Implications

Some areas of Spokane have higher rates of self-reported “poor” physical health in general (when provided the options of excellent, very good, good, fair, or poor) and higher rates of social vulnerability than other areas. Data from the Centers for Disease Control and Prevention (CDC) analyze rates of health conditions, including self-reported poor physical health, and social vulnerability of a community (Centers for Disease Control, 2025; Centers for Disease Control, 2022). Areas with more health concerns may have higher demand for EMS and areas of higher social vulnerability may have greater need for services that support wellbeing and resilience, like parks.

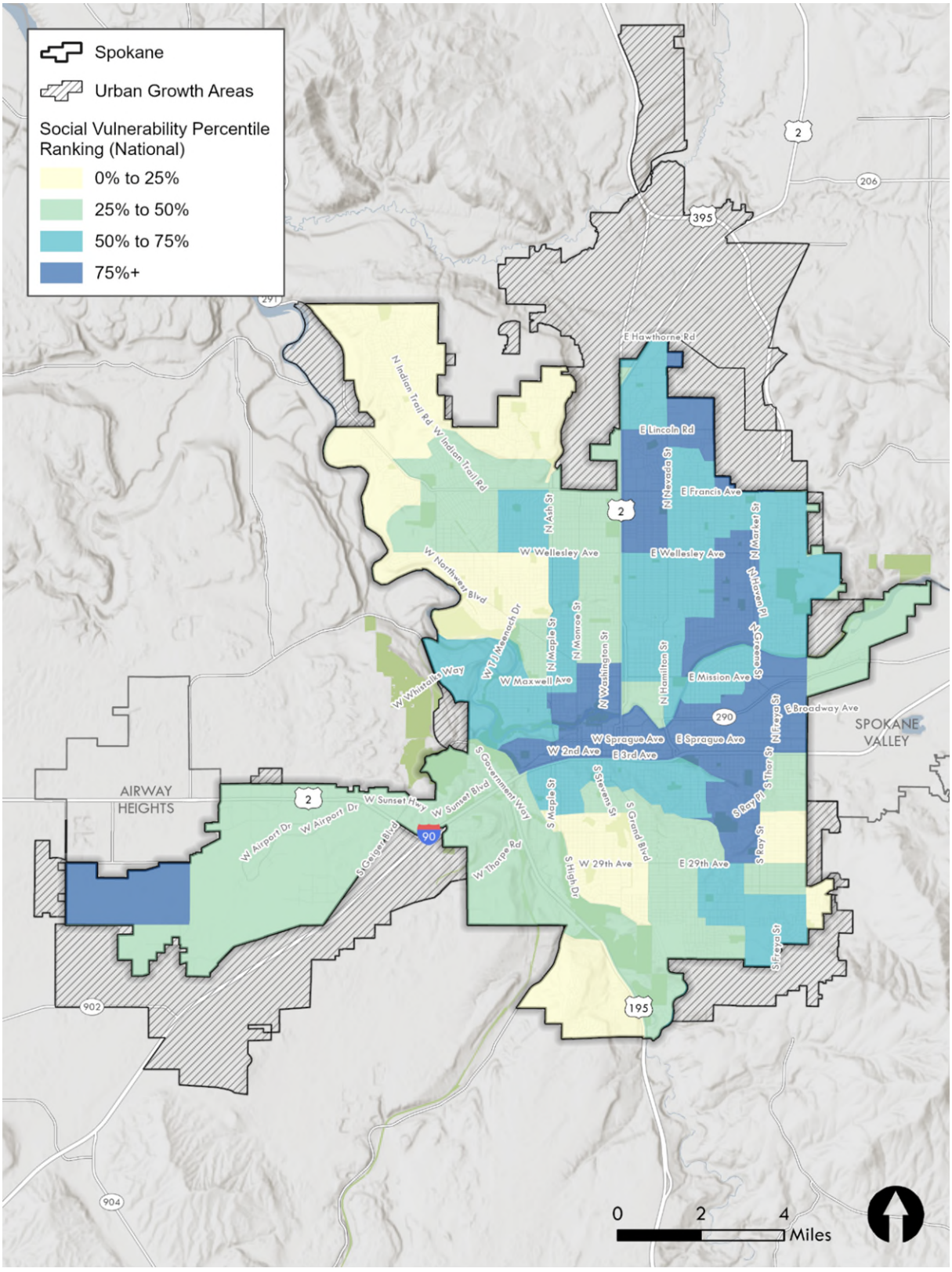
Exhibit 3.8-15 shows areas of the city with the highest rates of poor physical health and **Exhibit 3.8-16** shows areas of the city with the highest social vulnerability scores.

Exhibit 3.8-15. Poor Physical Health



Source: (Centers for Disease Control, 2025) (BERK, 2025)

Exhibit 3.8-16. Social Vulnerability Index



Source: (Centers for Disease Control, 2022)

Northwest Spokane

Northwest Spokane has some Census block groups with a high population with self-reported poor physical health. This includes areas around North Monroe Street and West Wellesley Avenue. Most of Northwest Spokane is not considered highly socially vulnerable, except for the Census tracts on the edge of Center City.

Northeast Spokane

Much of Northeast Spokane has a high percentage of residents with self-reported poor physical health, with the highest percentages around North Market Street and south of the Spokane River. Northeast Spokane also has several Census tracts that are considered high social vulnerability areas, including along North Market Street, North Nevada Street, East Lincoln Road, and south of the Spokane River.

Division Corridor

Much of the Division Corridor has a high percentage of residents with self-reported poor physical health, with the highest percentages around Center City. Areas of high social vulnerability are primarily to the north and south ends of the corridor.

Center City

Much of Center City has high percentages of residents with self-reported poor physical health. Social vulnerability is also generally high in this area.

South Spokane

While most of South Spokane does not have high rates of self-reported poor physical health, one area on the west side, following SR 195, does have high rates. There is one Census tract with high social vulnerability, along South Thor Street and South Roy Street towards I 90.

West Plains

West Plains does not have high rates of self-reported poor physical health or high social vulnerability.

3.8.2 Impacts

Impacts Common to All Alternatives

Environmental Impacts

Police

While the three alternatives vary in the location of future growth, all alternatives plan for between 25,157 and 50,650 new residents. The total number of jobs varies by alternative, with Alternative 3 planning for the highest number (38,848), Alternative 1 and the Preferred Alternative planning for the second highest (34,850), and Alternative 2 planning for the lowest (24,939).

To maintain the current ratio of 1.4 officers per 1,000 residents, SPD would need to hire between 36 and 72 new officers by 2046. This would equal between 3 and 6 new police officer positions per year over the 20-year period. Alternatives 1 and 3 and the Preferred Alternative may have additional impacts due to the higher number of jobs. Impacts from growth can be addressed through regular planning, staffing, and budgeting processes. For comparison, SPD hired 34 officers in 2023 alone, though this number also accounts for regular staff attrition. Additional evaluation may be needed to consider whether the current ratio of officers per 1,000 residents is adequate, based on SPD's reported capacity issues that persist even when all positions are filled.

Fire/EMS

All alternatives are expected to have similar impacts to fire and EMS services at the citywide scale because they all plan for the same amount of housing growth. To maintain the current ratio of 1.5 uniformed staff per 1,000 residents, SFD would need to hire between 38 and 76 staff per year. Alternatives 1 and 3 and the Preferred Alternative may have additional impacts due to the higher number of jobs. Impacts from growth can be addressed through regular planning, staffing, and budgeting processes. For reference, 43 new firefighters were hired in 2023 and 2024, though this number also accounts for regular staff attrition.

The Spokane Fire Department would aim to maintain its response time objectives, as described in **Section 3.8.1**. Response times have a strong correlation with staffing (Averill, J. et al., 2010). As the population grows, staffing would need to increase to maintain the Department's performance. Equipment availability is also important for response and the Department will need to invest in additional equipment to serve a larger population. GMA requirements to regularly prepare a capital facility plan to serve planned growth would include planning for apparatus and station improvements. The street network's ability to handle traffic flows also affects response times. As described under **Section 3.7**, traffic volumes would increase under all alternatives and several intersections would have level of service impacts, including under Alternative 1 (the No Action Alternative). The mitigation measures described in **Chapter 3.7** would support improved conditions and therefore fire response times.

Schools

Each alternative is expected to have varying impacts to each school district due to differences in growth distribution (**Exhibit 3.8-17**). Under Alternatives 2 and 3 and the Preferred Alternative, Spokane School District is expected to add 604-650 ~~488-505~~ more new students than under Alternative 1. In contrast, Alternative 1 would place more growth in the Mead School District, resulting in 605-702~~549-600~~ more students than Alternatives 2 and 3 and the Preferred Alternative.

Exhibit 3.8-17. Student Growth by School District

	Alternative 1		Alternative 2		Alternative 3		Preferred Alternative	
District	**Housing Growth**	**Student Growth**	**Housing Growth**	**Student Growth**	**Housing Growth**	**Student Growth**	**Housing Growth**	**Student Growth**
Spokane School District	18,196	4,988	20,565	5,638	20,461	5,609	20,399	5,592
Mead School District	1,704	772	154	70	266	120	358	162
Cheney School District	1,761	536	959	292	940	286	982	299

NOTE: The table above has been corrected with the Final EIS and analysis for the Preferred Alternative has been added. A software bug was identified in ESRI ArcGIS Pro that affected the calculations in the Draft EIS.
Source: (BERK, 202~~5~~6).

Parks

All alternatives include the same overall population growth and are expected to have similar impacts to the park system on a citywide scale. The City will need to add new park acreage under all alternatives to maintain the levels of service described in the 2022 Parks and Natural Lands Master Plan. This includes 53-106 acres of regional parks, 33-67 acres of community parks, 31-62 acres of neighborhood and pocket parks, 22-45 acres of parkways, and 182-367 acres of natural lands (**Exhibit 3.8-18**).

Exhibit 3.8-18. Park Acreage Needs

Park Classification	Publicly Accessible Property Acres	Acres/1,000 Population in 2020 (223,600)	New Acres Needed (Low Growth) – All Alternatives	New Acres Needed (High Growth) – All Alternatives
Regional Parks	474	2.1	53	106
Community Parks	297	1.33	33	67
Neighborhood and Pocket Parks	274	1.23	31	62
Parkways	196	0.88	22	45
Natural Lands	1,643	7.25	182	367

NOTE: Changes were made to the table above with the Final EIS to align with the draft Capital Facilities Plan.
Source: (BERK, 2025)

Impacts on park gap areas vary by alternative and are addressed in the **Area Specific Evaluation** below.

Libraries

All alternatives plan for the same amount of growth and therefore are expected to have similar impacts on the citywide library system. See **Exhibit 3.8-19**. The current ratio of library square footage to population is 0.9, which exceeds the adopted level of service of 0.813 square feet for capita. Without additional square footage added to the system, the level of service in 2046 is expected to be 0.83 under a lower growth projection and 0.74 under a higher growth projection. Therefore, under lower growth, Spokane Public Library would exceed the adopted level of service without adding new square footage. However, under a high growth projection, the level of service would decline below the target. To maintain the target level of service, 20,240 square feet of library space would be needed by 2046. The event and learning space currently under development by Thrive International, as part of a mixed-income housing project, will add approximately 1,500 square feet.

Exhibit 3.8-19. Library Levels of Service

	Low Growth Level of Service – All Alternatives	High Growth Level of Service – All Alternatives
Level of service	0.83	0.74
Total square footage needed (0.813 s.f. per capita)	208,174	231,989

	Low Growth Level of Service – All Alternatives	High Growth Level of Service – All Alternatives
Additional square footage needed (in addition to existing 211,750 s.f.*)	0	20,240*

* Does not include Thrive International partnership space that is currently in development.
Source: (BERK, 2026~~5~~)

Solid Waste

All alternatives plan for the same amount of housing unit and population growth. However, Alternatives 1 and 3 and the Preferred Alternative plan for greater job growth than Alternative 2, which would result in a greater amount of commercial waste. Under the planned housing unit growth, to maintain the current ratio of staff to waste collections per month, the City would need to add 25 additional staff positions to meet residential waste increases. This equals an average of 1-2 positions per year. A total of 102,000-114,000 tons of solid waste from Spokane residents and businesses would be expected per year starting in 2046, using the County's estimate of 800 pounds per capita per year.

Environmental Justice Implications

All alternatives plan for growth in areas with existing social disparities. This may have impacts to public services by creating more demand for emergency services and parks in certain areas of Spokane. All ~~three~~ alternatives place between ~~31~~ 40 and 46~~34~~% of growth in areas with a high percentage of self-reported poor physical health, which may increase demand for emergency services where there is already higher demand. See **Exhibit 3.8-20**. All alternatives also place between ~~23~~ 21 and 23~~7~~% of growth in areas with high social vulnerability. Greater growth in these areas may put more pressure on services like parks. Specific areas of growth are discussed below in **Area Specific Evaluation**.

Exhibit 3.8-20. Social Disparities and Housing Growth

	Alternative 1		Alternative 2		Alternative 3		Preferred Alt.	
Existing Conditions	Housing Growth	% of Growth	Housing Growth	% of Growth	Housing Growth	% of Growth	Housing Growth	% of Growth
High percentage of poor physical health	8,720	40%	9,560	44%	10,094	46%	9,272	43%
High social vulnerability	4,529	21%	4,902	23%	4,685	22%	4,888	22%

NOTE: The table above has been corrected with the Final EIS and analysis for the Preferred Alternative has been added. A software bug was identified in ESRI ArcGIS Pro that affected the calculations in the Draft EIS.
Source: (BERK, 2026~~5~~) (Centers for Disease Control, 2022) (Centers for Disease Control, 2025)

Area Specific Evaluation

Northwest Spokane

All alternatives plan for some housing growth in Northwest Spokane, particularly near Center City and the Division Corridor as well as in the North Indian Trail neighborhood. Job growth is also generally near Center City as well as pockets of growth in the Northwest and North Indian Trail neighborhoods. These neighborhoods are therefore likely to see some increased demand for police, fire/EMS, solid waste, schools, parks, and libraries in all alternatives. Housing growth is also expected in park gap areas in all alternatives, including North Indian Trail, Balboa/South Indian Trail, and Northwest. In Alternative 1, this also includes Five Mile Prairie. Need and demand for new parks in these gap areas will therefore increase.

Across the alternatives, Northwest Spokane has minimal growth overlapping with areas of high rates of self-reported poor physical health and high rates of social vulnerability. Minimal environmental justice impacts are expected in relation to public services.

Northeast Spokane

Housing growth in Northeast Spokane across the alternatives is generally clustered around Center City and in parts of the Hillyard neighborhood, as well as along the Division Corridor especially in Alternatives 2 and 3 and the Preferred Alternative. Job growth is generally near downtown, along the Division Corridor, and along East Francis Avenue, as well as in the Hillyard neighborhood. These neighborhoods are therefore likely to see some increased demand for police, fire/EMS, solid waste, schools, parks, and libraries in all alternatives. Housing growth is also expected in park gap areas in all alternatives, including Shiloh Hills, Hillyard, parts of Bemiss, and parts of East Central. Need and demand for new parks in these gap areas will therefore increase.

Across the alternatives, Northeast Spokane has growth in areas with high rates of self-reported poor physical health, particularly on the northern side. ~~and especially for Alternatives 1 and 2.~~ Northeast Spokane is also expected to see growth in areas with high rates of social vulnerability. Growth may result in higher demand for EMS and parks in these areas, which may already experience greater need than other areas of the city.

Division Corridor

All alternatives plan for some job and housing growth in the Division Corridor, especially in Alternatives 2 and 3 and the Preferred Alternative. This area is therefore likely to see some increased demand for police, fire/EMS, solid waste, schools, parks, and libraries in all alternatives. This includes housing growth in the park gap areas in north Shiloh Hills and East Central. These areas are therefore expected to have an increased need and demand for new parks.

Under all alternatives, some growth is expected to occur in parts of the Division Corridor that have high rates of self-reported poor physical health and social vulnerability, particularly in Alternatives 2 and 3 and the Preferred Alternative. Growth may result in higher demand for EMS and parks in these areas, which may already experience greater need than other areas of the city.

Center City

All alternatives plan for a substantial amount of job and housing growth in Center City, with the greatest growth planned under ~~Alternative 3~~the Preferred Alternative. Center City is therefore likely to see more demand for police, fire/EMS, solid waste, schools, parks, and libraries than other parts of the city in all alternatives. This includes housing growth in the park gap area in East Central, which is therefore expected to have an increased need and demand for new parks.

Under all alternatives, growth is expected in Center City, which has generally high rates of self-reported poor physical health and social vulnerability. Growth may result in higher demand for EMS and parks in these areas, which may already experience greater need than other areas of the city.

South Spokane

Some housing growth is planned for South Spokane in all alternatives, especially in the neighborhoods around Center City, along with parts of Lincoln Heights, Southgate, Grandview/Thorpe, and Latah/Hangman. These areas will likely experience greater demand on police, fire/EMS, solid waste, schools, parks, and libraries than other areas within South Spokane. This includes housing growth in the park gap areas in the East Central, Lincoln Heights, Rockwood, Comstock, Southgate, Latah, Grandview/Thorpe, and Browne's Addition neighborhoods. These areas are therefore expected to have an increased need and demand for new parks. Acquisition of land may also be more feasible in these areas than others based on land availability, particularly natural lands in the Thorpe and Latah areas.

Across the alternatives, South Spokane has minimal growth overlapping with areas of high rates of self-reported poor physical health and high rates of social vulnerability. Minimal environmental justice impacts are expected in relation to public services.

West Plains

All alternatives plan for some job and housing growth in West Plains, with housing primarily planned towards the eastern edge and jobs planned throughout, with an emphasis on the area north of the airport. These areas will likely experience greater demand on police, fire/EMS, solid waste, schools, parks, and libraries than other areas within West Plains. The location of housing growth also overlaps with park gap areas. This area will therefore have increased need and demand for new parks.

West Plains does not have areas of particularly high rates of self-reported poor physical health and social vulnerability. Minimal environmental justice impacts are expected in relation to public services.

Alternative 1: No Action, Stay the Course

Police

Greater demand for police services may occur in Downtown and in centers and corridors, as this is where growth would be focused in Alternative 1. Alternative 1 plans for the same job growth as the Preferred Alternative, more job growth than Alternative 2, and ~~but~~ less than Alternative 3~~, which could~~. This could result in greater demand for police services.

Fire/EMS

Greater demand for fire and EMS services may occur in Downtown and in centers and corridors, as this is where growth would be focused in Alternative 1. This may result in more demand on fire stations throughout the City, especially those serving Downtown (1), West Plains (6), Hillyard (15), Shiloh Hills (18), and East Central (7, 8, and 14). Stations 1 and 18 already respond to a substantial percentage of citywide calls.

Alternative 1 plans for the same job growth as the Preferred Alternative, more job growth than Alternative 2, ~~but~~ and less than Alternative 3. This~~, which~~ could result in greater demand for fire/EMS services.

Schools

Alternative 1 would have the greatest impact on the Mead and Cheney School Districts and the least on Spokane School District among the alternatives, based on the location of growth. Based on housing growth, new school demand in Alternative 1 is likely to be Downtown and in centers and corridors.

Parks

Parks demand in Alternative 1 is expected to be highest in Center City and surrounding neighborhoods, North Indian Trail, Five Mile Prairie, Shiloh Hills, Hillyard, Grandview/Thorpe, Latah/Hangman, Lincoln Heights, Southgate, East Central, and the eastern part of West Hills. Almost all of these areas also have existing gaps in park access.

Libraries

Growth in Alternative 1 is focused in Downtown, and in centers and corridors, so greater library demand in these areas is expected though citywide demand is expected to be the same. This may especially affect the Central Library.

Solid Waste

Growth in Alternative 1 is focused in Downtown and in centers and corridors, so greater residential waste demand is expected in those areas though citywide demand is expected to be the same.

Alternative 1 plans for the same job growth as the Preferred Alternative, more job growth than Alternative 2, ~~but~~ and less than Alternative 3~~, which~~. This could result in greater demand for commercial solid waste.

Environmental Justice Implications

Alternative 1 includes some areas of growth that overlap with areas of self-reported poor physical health, including Center City and the north side of Northeast. These areas may have greater demand for EMS services. Center City and parts of Northeast also have growth areas overlapping with areas of high social vulnerability, which may indicate an increased need for parks.

Alternative 2: Distributed and Balanced

Police

Greater demand for police services may occur along frequent transit corridors, as this is where growth would be focused in Alternative 2 though citywide demand is expected to be the same. Alternative 2 plans for the least amount of jobs so would likely have lower overall demand than Alternatives 1 and 3 and the Preferred Alternative.

Fire/EMS

Greater demand for fire and EMS may occur along frequent transit corridors, as this is where growth would be focused in Alternative 2 though citywide demand is expected to be the same. This may result in more distributed demand across the City, particularly at Stations 1, 2, 7, 8, 11, 13, 15 and 18. Stations 1 and 18 already take a high percentage of citywide calls. Alternative 2 plans for the least amount of jobs so would likely have lower overall demand than Alternatives 1 and 3 and the Preferred Alternative.

Schools

Total demand for new schools is likely to be similar across alternatives, however Alternative 2, like Alternative 3, would have greater demand on the Spokane School District and less on the Mead and Cheney School Districts than Alternative 1. Based on housing growth, new school demand in Alternative 2 is likely to be along frequent transit corridors. New students would likely be distributed more across the city, in contrast to Alternative 3 and the Preferred Alternative, where much of the student growth would happen in Downtown, West Plains, and Hillyard.

Parks

Parks demand in Alternative 2 is expected to be highest in Center City and surrounding neighborhoods, North Indian Trail, Hillyard, North Hill, Nevada Heights, Grandview/Thorpe, Latah/Hangman, Lincoln Heights, Southgate, and East Central. Many of these areas also have existing gaps in park access.

Libraries

Greater demand for libraries may occur along frequent transit corridors, as this is where growth would be focused in Alternative 2. This may distribute library demand more around the city, in contrast to Alternative 3 where much of the demand would likely affect the Central Library branch.

Solid Waste

Growth in Alternative 2 is focused along frequent transit corridors so greater residential waste demand is expected in those areas. Alternative 2 plans for the least amount of jobs so would likely have lower commercial demand than Alternatives 1 and 3 and the Preferred Alternative. Under Alternatives 2 and 3 and the Preferred Alternative, new LOS are also under consideration with the Capital Facilities Plan update and may change the number of collections to four per household per month for garbage, two for recycling, and four for organics.

Environmental Justice Implications

Alternative 2 includes some areas of growth that overlap with areas of poor physical health, including Center City, the north side of Northeast, and parts of the Division Corridor. These areas may have greater demand for EMS services. Center City and parts of Northeast also have growth areas overlapping with areas of high social vulnerability, which may indicate an increased need for parks.

Alternative 3: Center City and Regional Hubs

Police

Greater demand for police services may occur in Downtown and Regional Hubs like in West Plains and Hillyard, as this is where growth would be focused in Alternative 3. Alternative 3 plans for the greatest number of jobs so would likely have greater overall demand than Alternatives 1 and 2 and the Preferred Alternative.

Fire/EMS

Greater demand for fire and EMS may occur in Downtown and Regional Hubs including in West Plains and Hillyard, as this is where growth would be focused in Alternative 3. This may result in more demand at Stations 1, 6, and 15. Station 1 already responds to 18% of citywide calls. Alternative 3 plans for the greatest number of jobs so would likely have greater overall demand than Alternatives 1 and 2 and the Preferred Alternative. The additional intensities of jobs are expected in Center City to be focused on medical, educational, and R&D, whereas in West Plains and Hillyard more light and heavy industrial jobs are expected, which would require greater attention to fire and EMS activities including application of fire codes and regular inspections.

Schools

Total demand for new schools is likely to be similar across alternatives; however Alternative 3, like Alternative 2 and the Preferred Alternative, would have greater demand on the Spokane School District and less on the Mead and Cheney School Districts than Alternative 1. Based on housing growth, new school demand in Alternative 3 is likely to be highest Downtown and in Regional Hubs like West Plains and Hillyard.

Parks

Parks demand in Alternative 3 is expected to be highest in Center City and surrounding neighborhoods, North Indian Trail, Hillyard, Shiloh Hills, North Hill, Nevada Heights, Grandview/Thorpe, Latah/Hangman, Lincoln Heights, Southgate, and East Central. Many of these areas also have existing gaps in park access.

Libraries

Greater demand for libraries may occur in Downtown and Regional Hubs such as West Plains and Hillyard, which would have both industrial jobs and mixed-use commercial as well as residential uses. With this growth pattern, there may be increased demand at the Central Library in particular, as well as Liberty Park Library.

Solid Waste

Greater demand for solid waste services may occur in Downtown and Regional Hubs including West Plains and Hillyard, as this is where growth would be focused in Alternative 3. Alternative 3 plans for the greatest number of jobs so would likely have greater commercial waste demand than Alternatives 1 and 2 and the Preferred Alternative. Under Alternatives 2 and 3 and the Preferred Alternative, new LOS are also under consideration with the Capital Facilities Plan update and may change the number of collections to four per household per month for garbage, two for recycling, and four for organics.

Environmental Justice Implications

Alternative 3 includes some areas of growth that overlap with areas of self-reported poor physical health, including Center City and parts of the Division Corridor, to a greater extent than Alternative 2. These areas may have greater demand for EMS services. Center City and the north end of the Division Corridor also have growth areas overlapping with areas of high social vulnerability, which may indicate an increased need for parks.

Preferred Alternative

NOTE: *Analysis for the Preferred Alternative was added below with the Final EIS.*

Police

Greater demand for police services may occur in Downtown and Regional Hubs like in West Plains and Hillyard, as this is where growth would be focused in the Preferred Alternative. The Preferred Alternative plans for the same number of jobs as Alternative 1, which is a higher number than Alternative 2 but lower than Alternative 3. This could result in greater overall demand for police services than Alternative 2.

Fire/EMS

Greater demand for fire and EMS may occur in Downtown and Regional Hubs including in West Plains and Hillyard, as this is where growth would be focused in the Preferred Alternative. This may result in more demand at Stations 1, 6, and 15. Station 1 already responds to 18% of citywide calls. The Preferred Alternative plans for the same number of jobs as Alternative 1, which is a higher number than Alternative 2 but lower than Alternative 3. This could result in greater overall fire/EMS demand than Alternative 2. The additional intensities of jobs are expected in Center City to be focused on medical, educational, and R&D, whereas in West Plains and Hillyard more light and heavy industrial jobs are expected, which would require greater attention to fire and EMS activities including application of fire codes and regular inspections.

Schools

Total demand for new schools is likely to be similar across alternatives; however the Preferred Alternative, like Alternatives 2 and 3, would have greater demand on the Spokane School District and less on the Mead and Cheney School Districts than Alternative 1. Based on housing growth, new school demand in the Preferred Alternative is likely to be highest Downtown and in Regional Hubs.

Parks

Parks demand in the Preferred Alternative is expected to be highest in Center City and surrounding neighborhoods, North Indian Trail, Hillyard, Shiloh Hills, North Hill, Nevada Heights, Grandview/Thorpe, Latah/Hangman, Lincoln Heights, Southgate, and East Central. Many of these areas also have existing gaps in park access.

Libraries

Greater demand for libraries may occur in Downtown and Regional Hubs such as West Plains and Hillyard, which would have both industrial jobs and mixed-use commercial as well as residential uses. With this growth pattern, there may be increased demand at the Central Library in particular, as well as Liberty Park Library.

Solid Waste

Greater demand for solid waste services may occur in Downtown and Regional Hubs including West Plains and Hillyard, as this is where growth would be focused in the Preferred Alternative. The Preferred Alternative plans for the same number of jobs as Alternative 1, which is a higher number than Alternative 2 but lower than Alternative 3. This could result in greater demand for solid waste services than Alternative 2. Under the Preferred Alternative and Alternatives 2 and 3, new LOS are also under consideration with the Capital Facilities Plan update and may change the number of collections to four per household per month for garbage, two for recycling, and four for organics.

Environmental Justice Implications

The Preferred Alternative includes some areas of growth that overlap with areas of self-reported poor physical health, including Center City and parts of the Division Corridor, to a similar extent as Alternative 2. These areas may have greater demand for EMS services. Center City and the north end of the Division Corridor also have growth areas overlapping with areas of high social vulnerability, which may indicate an increased need for parks.

Maximum Development Scenarios

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

If growth were to accelerate beyond the City's growth targets to maximum potential development, there could be increased impacts to public services. The No Action Alternative has 39% more capacity than the housing target and the Preferred Alternative has 63% more capacity than the housing target. See **Chapter 2, Exhibit 2.4-22.** Growth to full capacity is unlikely as targets are based on the City's share of the most likely OFM growth projection.

There is a higher capacity for population too well above the target of around 25,157 population (2022-2046), but this EIS did look at a wider range of population (25,157 to 50,650) to reflect household size trends. The No Action Alternative has a population capacity of about 63,301 and the Preferred Alternative has a population capacity of about 72,478. See **Chapter 2, Exhibit 2.4-23.**

Capacity under the Preferred Alternative is approximately 17% above the No Action Alternative for housing and 14% above the No Action Alternative for population.

Increased growth beyond the targets would result in a larger population and greater demand for public services. Under the Preferred Alternative, growth would largely occur along frequent transit corridors and in already developed locations, which may be more efficient to serve with public services due to density. Capital planning for police, fire/EMS, schools, parks, libraries, and solid waste occurs at least every six years and if growth were projected to exceed targets this would be an opportunity to plan for increased impacts. The City will also have a Comprehensive Plan progress report due every 5 years and a periodic update to the Comprehensive Plan every 10 years where the City can consider its growth and public services needs. (RCW 36.70a.130)

3.8.3 Mitigation Measures

Incorporated Plan Features

- The adopted Comprehensive Plan includes a Capital Facilities and Utilities Element and a Parks and Recreation Element, which include policies that support planning for levels of service, operations, maintenance, funding, and capital projects for public services.
- The adopted Capital Facilities Plan includes level of service standards for police, fire/EMS, schools, and libraries.
- The adopted Parks and Natural Lands Master Plan includes levels of service and policies to support park development to meet current and future City needs.
- Alternatives 2 and 3 and the Preferred Alternative include a new Spokane Capital Facilities Plan, which updates the adopted plan to align with other providers' plans and current population numbers. An updated Capital Facilities Plan would ensure the most recent plans for future growth are considered in capital planning. New LOS for some types of capital facilities are also under consideration as part of this plan and would better take current conditions and observed deficiencies into account.
- Alternatives 2 and 3 and the Preferred Alternative include a new Climate Element, which includes goals and policies to support climate resiliency of City functions, including emergency services, like police, fire, and EMS, and parks. Policies will also support environmental health which may put less pressure on emergency services.

Regulations and Commitments

- An increase to local sales and use tax to support a Public Safety Tax for criminal justice and fire protection became effective April 1, 2025.
- Spokane County's 2021 Comprehensive Emergency Management Plan includes actions for preparedness, prevention, protection, mitigation, response, and recovery for a range of hazards that require emergency response.
- The Spokane Fire Department created a Strategic Positioning Plan in 2019, which included seven goals to continuously improve its services.
- The Spokane Municipal Code includes fire code (Chapter 17F.080) and wildland-urban interface code (Chapter 17F.110) for fire prevention and response, both of which are based on international standards.
- The City of Spokane Fire Department has implemented a wildland fuels reduction program together with partners such as Washington Department of Natural Resources.
- The 2025-2026 Spokane Police Department Strategic Plan identified six strategic priorities for the department.

Other Potential Mitigation Measures

- Impact fees for schools, parks, or fire protection could support increased staffing and capacity to address ongoing growth, if other funding streams are unable to match needs.
- The City could investigate opportunities for increased parks access such as a fee-in-lieu program or park land dedications in key locations.
- The City could explore partnership opportunities to support the development of educational and childcare spaces, or public-private partnerships to develop parks or acquire natural lands.

3.8.4 Significant Unavoidable Adverse Impacts

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

3.9 Utilities

This section identifies the policy and regulatory framework governing utility development, provision, and operations; existing utilities providers in Spokane; and the potential effects of the three alternatives being considered on the need for capital improvements.

Thresholds of significance utilized in this impact analysis include:

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

3.9.1 Affected Environment

The following existing utility providers in the City of Spokane were considered in this analysis:

- Power (Avista)
- Water system (City of Spokane)
- Sewer system (City of Spokane)
- Storm drainage system (City of Spokane)

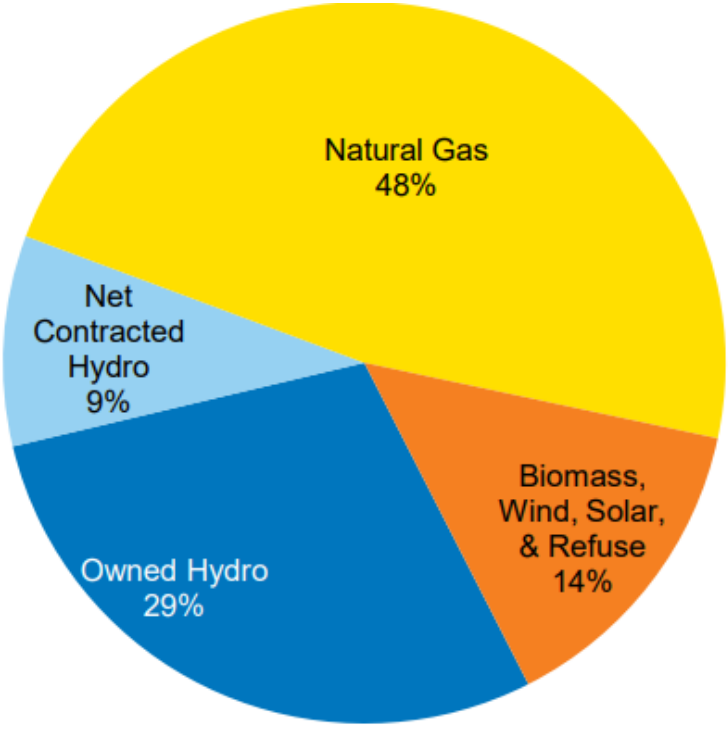
This section describes the elements of the existing utility systems as well as related natural, social, and economic environments that might be affected by the alternatives. This section provides a baseline by which changes that might be caused by the proposals can be measured against.

Power

Information about power relies primarily from Avista Corporation's 2025 Electric Integrated Resource Plan (2025 IRP).

Avista is an electrical and natural gas utility with a service area that spans much of the northwestern United States. Service to the City of Spokane area started in 1889 as Washington Water Power which changed to Avista in 1999 through an update to their corporate name. Avista provides electricity through natural gas generators as well as water, solar, and wind sources. The breakdown of the power generation sources is provided in **Exhibit 3.9-1**.

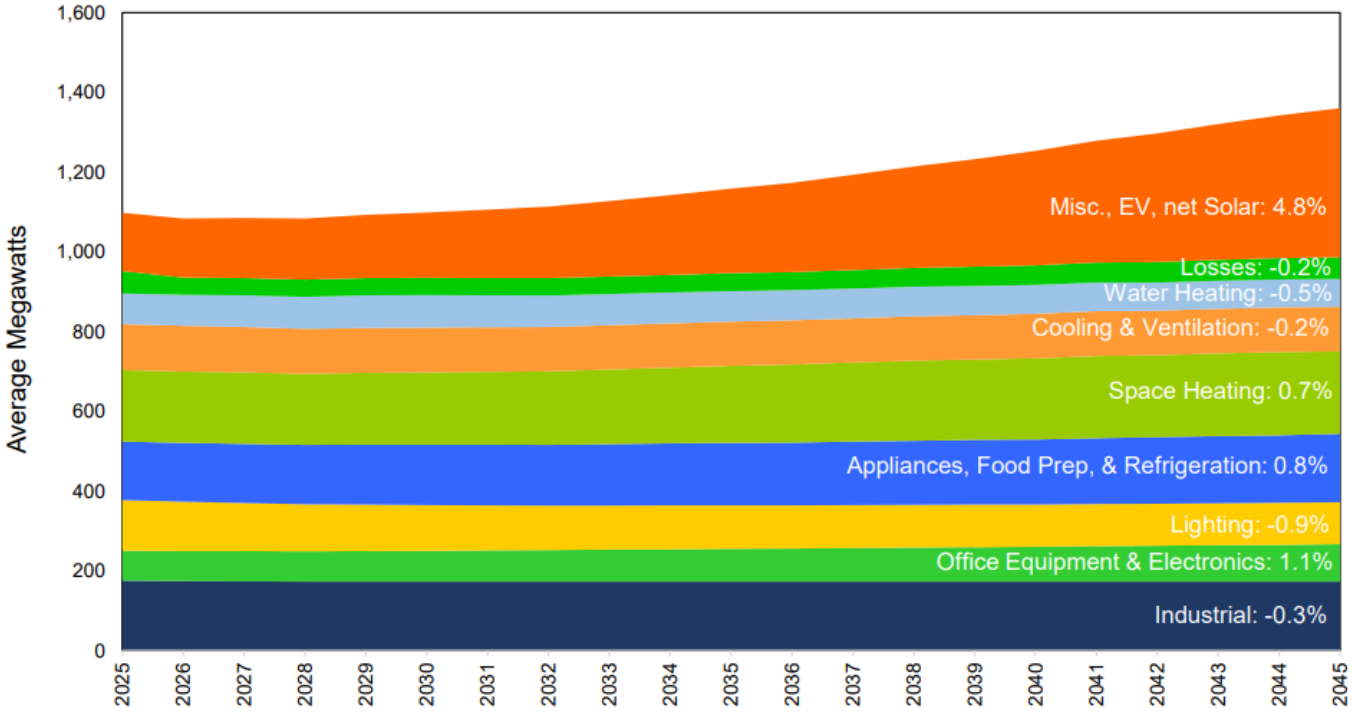
Exhibit 3.9-1. 2026 Generating Capability by Fuel Source



Source: Figure 2 - 2025 Avista IRP, 2025.

Avista prepared its 2025 IRP to address growth in their services over the next 20 years based on their own projections of a 0.91% increase of electricity consumption for the first 10 years and then a1.4% increase in consumption in the last 10 years, largely due to electrification of buildings and transportation. **Exhibit 3.9-2** shows the growth in energy use separated by end use from 2025 to 2045.

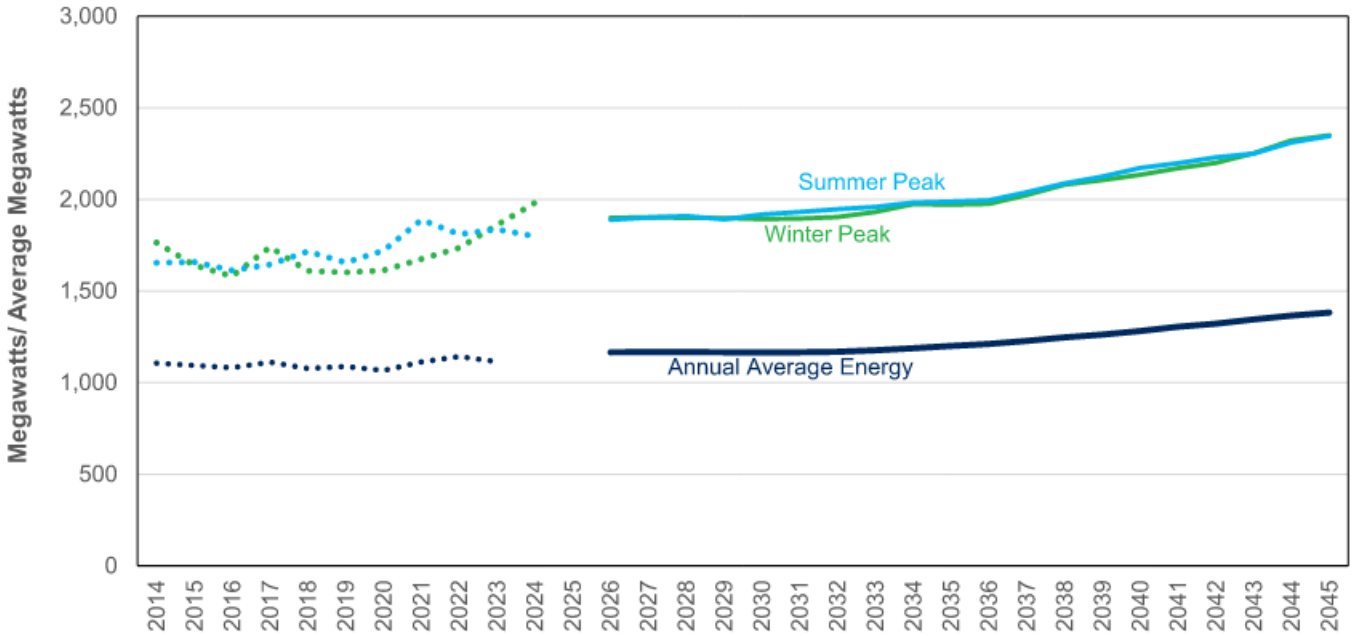
Exhibit 3.9-2. Change in Energy Use by End Use, 2025-2045



Source: Figure 3.11 – 2025 Avista Electric IRP, 2025.

Avista also records and forecasts their summer and winter peak loads as they tend to be representative of the largest loads on their system. These peaks are forecasted to grow at 1.14% and 1.12% for the summer and winter peaks respectively for the first 10 years with a significantly higher growth rate of 1.7% for the last 10 years. **Exhibit 3.9-3** is a graph of the annual average energy growth rate with the summer and winter peaks shown.

Exhibit 3.9-3. Customer Load Forecast



Source: Figure 1 - 2025 Avista Electric IRP, 2025.

Avista's power system has interplay between public and private infrastructure over the entire study area as it serves as the primary power source. Growth in any subarea and type of connection would result in a larger power demand on Avista's grid. Avista's Spokane-based power system interacts with the following study areas outlined below.

Northwest Spokane

Northwest Spokane has a varied landscape including high density residential as well as commercial, educational, and rural areas. Most of the area is dominated by single unit residential developments with smaller pockets of high intensity residential and commercial developments near the Division corridor. The western and northern sections of this area are more rural with lower intensity residential and forested areas. Avista operates 5 substations in the Northwest Spokane Subarea.

Northeast Spokane

Northeast Spokane is varied in its landscape with a larger area of industrial sites to the east and south and commercial developments along the Division corridor. The area also includes a large amount of single unit and high intensity residential areas. There are little to no rural areas as much of the area is developed. Avista operates 4 substations and a natural gas generator in the Northeast Spokane Subarea. Avista's IRP notes a plan to upgrade the Beacon Substation located near the intersection of Havana St. And Buckeye Ave.

Center City

The Center City area is the highest intensity area within Spokane including commercial, office, and high intensity residential areas. Many of the governmental entities reside within this area. Center City has little to no rural or forested areas. Avista has one substation and 4 hydroelectric facilities in this study area.

South Spokane

The South Spokane area is another varied area with areas of commercial as well as single unit and multi-unit residential areas. This area is more spread out and has large variations in elevation. The center of this area is where most of the commercial development is located (along 29th and Regal). The area is bounded on the west and south by more rural and forested areas. Avista operates 5 substations in this study area.

West Plains

The West Plains area is the most spread out area and also the area with the least development. Spokane International Airport is located in the center of this area. Much of the West Plains is covered by open space and industrial areas. Avista notes that the West Plains is a target of new improvements with the Blue-Bird – Garden Springs 230 kV project. Avista operates 4 substations in this study area. Avista's IRP identified the West Plains area as one where additional capacity would be required due to residential and industrial growth.

Water

Information in this section relies primarily on the 2023 City of Spokane Water System Plan (WSP).

The City of Spokane has owned and operated its public water system since the late 1800s. The water system includes 8 ~~water producing~~ well stations, 35~~7~~ water storage reservoirs, 24~~6~~ booster pump stations serving 22~~5~~ pressure zones, and more than 1,100 miles of water pipelines. It serves more than 80,000 connections throughout the city.

The source water for the City's water system is the Spokane Valley-Rathdrum Prairie Aquifer (designated a sole source aquifer in 1978 by the EPA). The Aquifer is primarily recharged through surface runoff and surface waters in the region.

This analysis references the pressure zones for the water system as there is significant overlap between pressure zones in multiple study areas, and the Water System Plan is arranged to address each pressure zone. The City's Pressure Zones are provided in **Exhibit 3.9-4** and **Exhibit 3.9-5**. They are grouped by general area for the discussion later in this chapter.

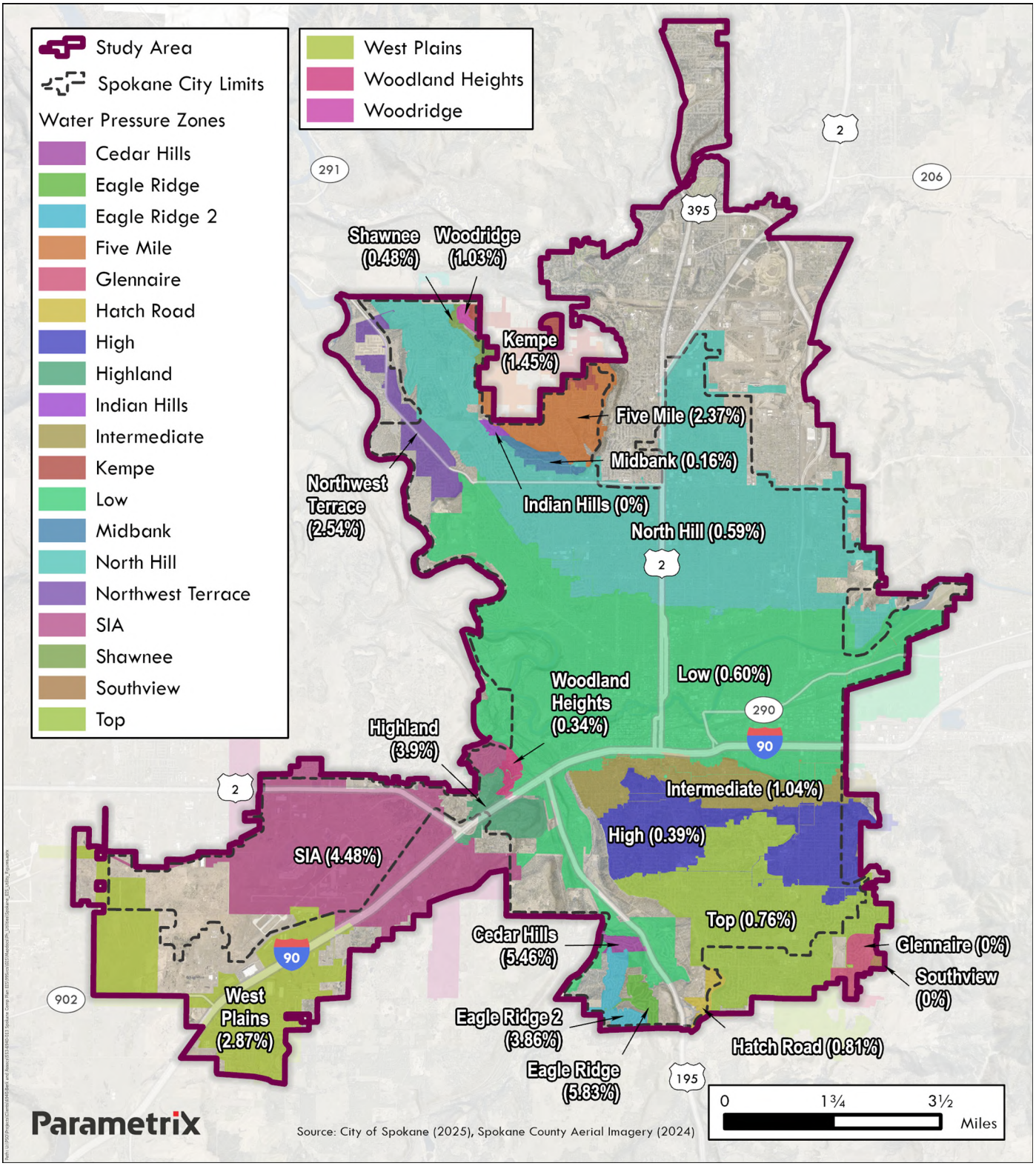
Exhibit 3.9-4. City of Spokane Water System Pressure Zones

Pressure Zone	Location
Cedar Hills	South Spokane: off Hwy 195 in the Latah Valley north of Eagle Ridge
Eagle Ridge	South Spokane: off Hwy 195 in the Latah Valley south of Eagle Ridge
Eagle Ridge 2	South Spokane: off Hwy 195 in the Latah Valley just west of Hatch Rd
Five Mile	Northwest Spokane: on top of Five Mile Prairie
Glennaire	South Hill Spokane: east of Glenrose on 57th
Hatch Road	South Hill Spokane: on Hatch Road Between Hwy 195 and 57th
High	South Hill Spokane: Manito and Lincoln Heights Neighborhoods
Highland	West Plains Area: around Highland Park
Indian Hills	Northwest Spokane: east of the Intersection of Indian Trail Rd and Barnes Rd
Intermediate	South Hill Spokane: south of Downtown between I90 and 14th.
Kempe	Northwest Spokane: on the 5 Mile Prairie north of Strong Rd
Low	Center Spokane: large low-lying area north of I90 and south of Garland Ave
Midbank	Northwest Spokane: southern hillside of the Five Mile Prairie
North Hill	North Spokane: large area spanning north of Garland to the City limits
Northwest Terrace	Northwest Spokane: development west of Hwy 291 north of Francis Ave
Shawnee	Northwest Spokane: east of Indian Trail Rd near Shawnee Ave
SIA	West Plains area: in and around the Spokane International Airport
Southview	Southeastern Spokane: east of Glennaire at the top of the hill
Top	South Hill Spokane: south of the High Zone extending outside of the city limits to the south.
West Plains	West Plains area: southwest of Spokane International Airport
Woodland Heights	West Plains area: area west of Hwy 195 and south of I90
Woodridge	Northwestern Spokane: at the northwestern end of Five Mile Prairie

Source: City of Spokane, September, 2023.

Exhibit 3.9-5 below shows the pressure zones over the study area. The numbers in parentheses next to each name of the pressure zone is the ERU growth per year for each pressure zone.

Exhibit 3.9-5. Map of City of Spokane Water System Pressure Zones



NOTE: The map above was updated with the Final EIS.
Source: City of Spokane, July, 2025.

The WSP determined the initial water system demands shown in **Exhibit 3.9-6**. Water system demands are expressed in terms of Equivalent Residential Units (ERUs) which represent the average use of a single-unit residential dwelling within the pressure zone. Also shown in **Exhibit 3.9-6** is the Distribution System Leakage (DSL), which is the representation of the estimated water loss due to system leakage, also expressed as ERUs.

Exhibit 3.9-6. Equivalent Residential Unit (ERU) Flowrates by Pressure Zone

Pressure Zone	ERU (Count)	DSL ERU (Count)	Total ERU (Count)	ERU_{ADD} (gpd/unit)	ERU_{MDD} (gpd/unit)	ERU_{Winter} (gpd/unit)
Hatch Road	198	n/a	198	951	4,460	161
Southview	43	1	44	657	3,001	166
Woodridge	64	4	68	733	2,895	135
Glennaire	522	8	530	571	2,709	139
Shawnee	156	10	166	603	2,277	148
Eagle Ridge	459	3	462	501	2,157	132
Indian Hills	56	n/a	56	524	2,150	147
Five Mile	2,047	54	2,101	594	2,138	141
Woodland Heights	243	82	325	463	1,976	124
Kempe	885	28	913	529	1,970	123
Midbank	573	12	585	514	1,911	128
Cedar Hills	221	6	227	443	1,906	116
Highland	862	67	929	442	1,883	126
Eagle Ridge 2	915	25	940	455	1,821	120
Northwest Terrace	1,497	n/a	1,497	487	1,739	120
Top	11,811	1,181	12,992	509	1,718	127
SIA	5,840	31	5,871	419	1,661	132
West Plains	4,665	167	4,832	415	1,547	130
High	9,563	604	10,167	368	1,203	130
North Hill	39,531	2,104	41,635	347	1,032	120
Intermediate	8,757	1,073	9,830	303	838	107
Low	47,166	8,990	56,156	303	734	106
Total	136,074	14,450	150,524			

Source: Table 2.2 - City of Spokane 2023 Water System Plan, September, 2023.

Growth in each pressure zone was determined in the WSP through the Spokane Regional Transportation Council (SRTC) 2019 Land Use Update Summary Traffic Analysis Zones (TAZs) and associated demands were applied to forecast water demand to 2042. These growth rates were applied to each pressure zone based on the TAZ forecast which resulted in the growth shown in **Exhibit 3.9-7** . The annual growth in percent (%) between the plan year and 20-year projection is summarized in **Exhibit 3.9-8** as well.

Exhibit 3.9-7. 20-year Projected Number of Equivalent Residential Units per Pressure Zone

Pressure Zone	Number of ERU	ERU Growth Per Year (%)
Cedar Hills	475	5.46
Eagle Ridge	1,001	5.83
Eagle Ridge 2	1,665	3.86
Five Mile	3,095	2.37
Glennaire	530	0
Hatch Road	230	0.81
High	10,955	0.39
Highland	1,653	3.9
Indian Hills	56	0
Intermediate	11,874	1.04
Kempe	1,178	1.45
Low	62,948	0.60
Midbank	604	0.16
North Hill	46,540	0.59
Northwest Terrace	2,257	2.54
Shawnee	182	0.48
SIA	11,127	4.48
Southview	44	0
Top	14,955	0.76
West Plains	7,602	2.87
Woodland Heights	347	0.34
Woodridge	82	1.03
Uncategorized	828	N/A
Total	180,228	1.62

Source: Table 2.11 - City of Spokane Water System Plan, 2023.

The Water System Plan also classified the growth of different customer classes. **Exhibit 3.9-8** shows the growth of each customer class by pressure zone.

Exhibit 3.9-8. Growth Rate by Pressure Zone and Customer Class

Pressure Zone	LU1: Single Family Households	LU2: Multifamily Households	LU3: Hotel and Motel Rooms/Campsites	LU4: Ag./Forestry/Mining /Industry/Manufact	LU5: Retail Trade (non-CBD)	LU6: Services and Offices	LU7: FIRES	LU8: Medical	LU9: Retail Trade (CBD)	LU10: College and Commuter Students	LU11:Education (K-12)	LU12: Education (College and University)
Cedar Hills	196	0	0	0	5	0	1	2	0	0	10	0
Eagle Ridge	304	0	0	0	9	0	1	2	0	0	16	0
Eagle Ridge 2	402	0	0	0	11	1	2	3	0	0	21	0
Five Mile	743	31	0	0	40	39	5	37	0	0	17	0
Glennaire	6	1	0	0	0	2	0	1	0	0	3	0
Hatch Road	23	0	0	0	0	0	0	0	0	0	0	0
High	437	100	0	1	52	77	30	492	0	3	196	3
Highland	262	757	99	6	45	19	0	0	0	0	0	0
Indian Hills	3	0	0	0	5	7	1	10	0	0	0	0
Intermediate	234	199	163	1	89	98	10	2,236	0	0	77	2
Kempe	191	0	0	0	12	4	0	1	0	0	37	0
Low	1,592	2,517	399	830	839	2,728	138	3,791	61	3,950	617	1,178
Midbank	0	0	0	0	21	19	2	7	0	0	0	0
North Hill	2,136	922	125	184	1,100	2,197	723	2,307	0	115	434	8
Northwest Terrace	459	335	0	0	0	86	0	0	0	0	0	0
Shawnee	15	0	0	0	7	10	2	15	0	0	0	0
SIA	711	1,600	243	4,285	2,039	922	89	572	0	86	42	0
Southview	0	0	0	0	0	0	0	0	0	0	0	0
Top	760	748	0	5	1,035	197	30	717	0	5	134	1
West Plains	1,070	281	36	1,494	1,073	34	0	0	0	0	2	0
Woodland Heights	3	23	31	2	35	6	0	12	0	0	0	0
Woodridge	6	0	0	0	1	0	0	0	0	0	8	0
TOTAL	**9,553**	**7,514**	**1,096**	**6,808**	**6,418**	**6,446**	**1,034**	**10,205**	**61**	**4,159**	**1,614**	**1,192**

Source: City of Spokane Water System Plan, 2023.

The following sections outline the characteristics of each group of water pressure zones. The groups of pressure zones were selected based on their geographic area with some consideration of the study areas, but as noted previously they have significant overlap between different study areas in many cases.

Cedar Hills, Eagle Ridge 1 & 2, and Hatch Pressure Zones

The Cedar Hills, Eagle Ridge 1&2, and Hatch pressure zones are in the South Spokane study subarea and are generally characterized by large suburban developments. The Water System Plan (WSP) shows almost all the growth for this zone is to support single unit household customers with limited commercial growth. The WSP includes projects that address growth in the zone with the planned addition of a new booster pump station and reservoir within the Eagle Ridge pressure zone as well as associated transmission mains.

High, Top, Glennaire, and Southview Pressure Zones

The High, Top, Glennaire, and Southview pressure zones are located in the South Spokane study subarea, extending beyond the city limits and span a wide range of elevations. The WSP shows growth in this zone to support single unit, multi-unit, and commercial uses. The WSP includes projects that upgrade booster stations to address additional flowrate needs to keep up with growth, replacements, and maintenance for reservoirs that are nearing the end of their service life.

Low and Intermediate Pressure Zones

The Low and Intermediate pressure zones cover areas in the Center City, Northeast, and Northwest study subareas and extend north to near Garland Ave and Northwest Blvd. Most of the City's production wells are in the Low and Intermediate pressure zones. The WSP shows growth in all categories but includes higher growth levels to support medical and educational uses. The WSP includes projects that increase well production and pump station capacity, replace pump stations nearing the end of their service life, increase transmission main capacity, and install new reservoirs to increase storage capacity.

North Hill, Northwest Terrace, Midbank, Indian Hills, Five Mile, Kempe, Shawnee, and Woodridge Pressure Zones

The North Hill, Northwest Terrace, Midbank, Indian Hills, Five Mile, Kempe, Shawnee and Woodridge pressure zones are in the Center City, Northeast, and Northwest study subareas in the northern third of the city and extend over a wide range of elevations and around isolated hillsides. The WSP shows growth for all customer classes but has higher growth for single and multi-unit housing, commercial, and medical uses. The WSP includes projects that increase well production and pump station capacity, replace pump stations nearing the end of their service life, increase transmission main capacity, and install new reservoirs to increase storage capacity.

West Plains, SIA, Highland, and Woodland Heights Pressure Zones

The West Plains, SIA, Highland, and Woodland pressure zones are within the West Plains and South Spokane study subareas and cover the area west of downtown including the Spokane International Airport and the West Plains. The WSP shows growth for all customer classes except medical and educational. The WSP includes projects that increase pump station capacity, replace pump stations nearing the end of their service life, increase transmission main capacity, and install new reservoirs to increase storage capacity.

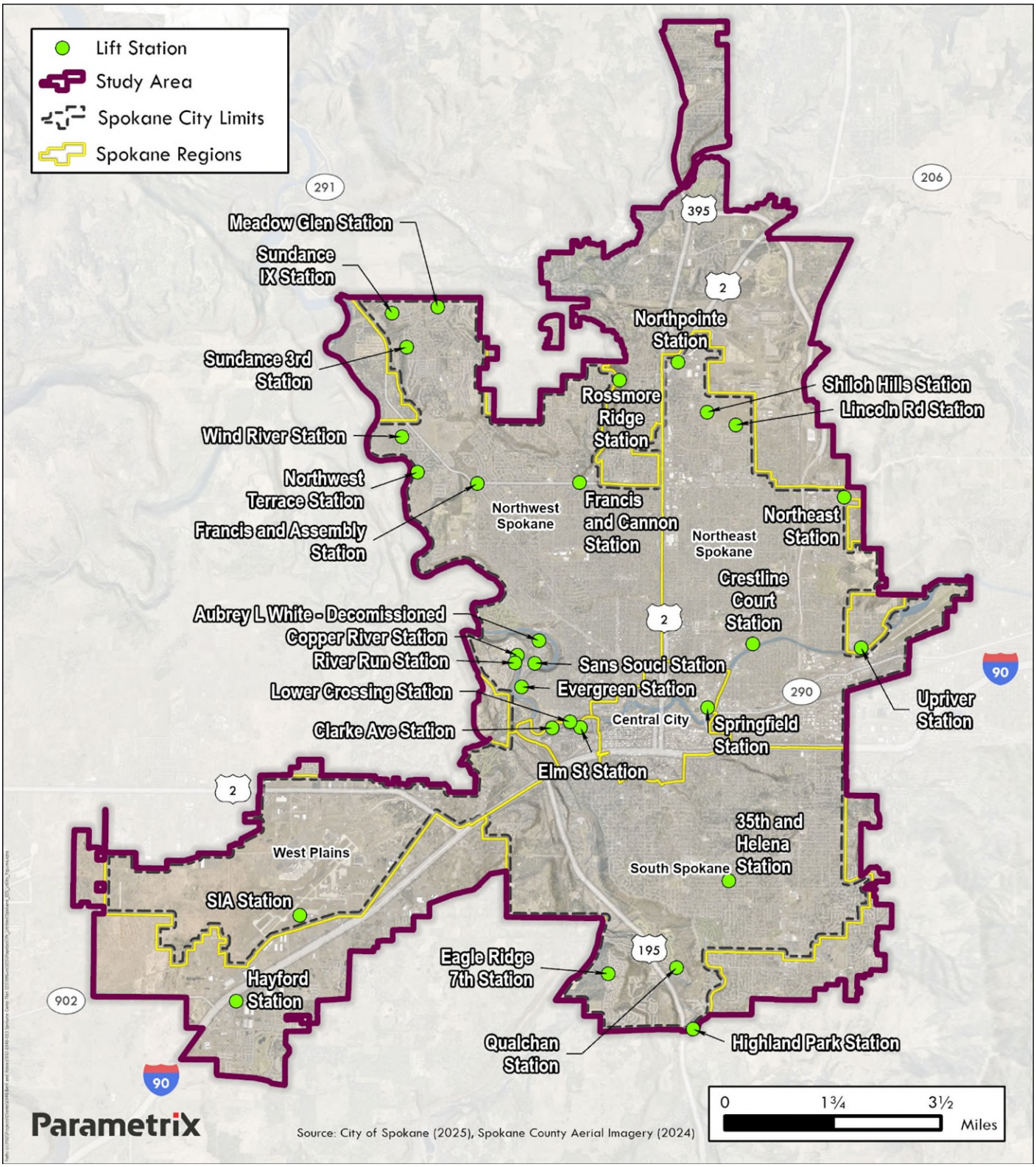
Wastewater

Information from this section is based on the City of Spokane's Integrated Clean Water Plan (ICWP) from 2014.

The City owns and maintains a wastewater system that comprises nearly 900 miles of sewer lines. There are several areas within the City's sanitary sewer system which are combined with stormwater, but those areas have interceptors and combined sewer overflow tanks which provide temporary storage during large rain events. The City also owns and operates the Riverside Park Wastewater Reclamation Facility (RPWRF), which collects and treats all the wastewater in the City's sanitary sewer system.

Sewer basins are usually split between those that drain via gravity and those that drain via a pumped system. Pumped systems are inherently more restrictive than gravity systems and thus will be more susceptible to issues brought about due to increases in unplanned flowrates. For this reason, this analysis focuses on basins that drain via pumped systems over the capacity of gravity sewer mains. The other consideration is the connection between the City's stormwater and sanitary sewer systems via the Combined Sewer Overflow (CSO) network. The discussion on the CSO network is provided in the Stormwater section later in this chapter. **Exhibit 3.9-9** below shows the locations of the City's wastewater pump stations from the 2023 Wastewater Lift Stations Conditions Assessment completed by Parametrix, Inc.

Exhibit 3.9-9. Map of Sanitary Sewer Pump Stations In Spokane



Source: Parametrix 2026, City of Spokane 2026.

Northwest Spokane

The sanitary sewer system in Northwest Spokane flows to the RPWRF generally southeasterly via gravity except for several isolated areas which flow to a regional pump station first. The pump stations located in this region are shown below in **Exhibit 3.9-10**. There are a few other limiting pipelines within this study area, including the siphon crossing of the Spokane River near TJ Meenach Way and the siphon that crosses the Northside Landfill just south of the Indian Trail area. The RPWRF is also located in this area, and per the ICWP, it was planned for treatment of 50 million gallons per day (mgd) through a membrane facility, which was completed between the preparation of the plan in 2014 and this document. The ICWP envisioned possible future expansion to handle 85 mgd. The City has recently begun the facility planning process for the RPWRF to look at the 20-year horizon and beyond. This process will evaluate the need for further expansion.

Exhibit 3.9-10. Sanitary Sewer Pump Stations In Northwest Spokane

Station Name
Northwest Terrace
River Run
Sans Souci
Sundance 3rd Addition
Sundance IX Addition
Meadow Glen
Evergreen
Rossmoor Ridge
Copper River
Francis & Assembly
Francis & Cannon
Lower Crossing
Aubrey L. White (Decommissioned)
Wind River

Source: City of Spokane, 2023.

Northeast Spokane

The sanitary sewer system in Northeast Spokane flows southwesterly towards the RPWRF, but due to several isolated areas, there are several regional pump stations that are used to link to larger gravity mains. The Upriver pump station captures several services from Spokane County and pumps them westerly. The Northpointe and Lincoln pump stations capture the large area north of Francis Ave and East of Division St and pump south to a trunk line that links up with the rest of the northeastern system before heading to the RPWRF. Other limiting pipes within the Northeast area are siphons that cross the Spokane River near Regal St and Boone Ave. This area also receives flows from a portion of the Spokane County sewer system that cannot easily be routed to the Spokane County Wastewater Treatment Plant. This flow comes from the Marion Hay pump station which outlets into the Francis and Cannon Station.

Exhibit 3.9-11. Sanitary Sewer Pump Stations In Northeast Spokane

Station Name
Upriver
Lincoln Rd
Shiloh Hills
Crestline
Northpointe

Source: City of Spokane, 2023.

Center City

The sanitary sewer system in Center City flows northwesterly towards the RPWRF. This area has the fewest pump stations but is the most densely populated. There are a few critical pipelines that cross bridges in this area which convey flow from much of the South Hill, most notably the 60-inch trunk line that crosses the Post Street Bridge.

Exhibit 3.9-12. Sanitary Sewer Pump Stations In Central Spokane

Station Name
Springfield

Source: City of Spokane, 2023.

South Spokane

The sanitary sewer system in the southern portion of Spokane flows northerly towards the RPWRF. Flows from this region cross the Spokane River in one of only two locations, either through the Clarke Ave pump station or across the 60-inch trunk line under the Post Street Bridge. Clarke Ave is the City's largest pump station and it conveys a portion ~~most~~ of the west half of the South Hill as well as all of the West Plains area. The remaining pump stations serve several smaller isolated areas.

Exhibit 3.9-13. Sanitary Sewer Pump Stations In South Spokane

Station Name
Eagle Ridge
Clarke Ave
Qualchan
35th and Helena
Highland Park
Elm Street

Source: City of Spokane, 2023.

West Plains

The West Plains sanitary sewer system flows northeasterly towards the Clarke Ave pump station, where it crosses the Spokane River towards the RPWRF. This area also crosses Latah Creek near High Bridge Park. Also included in this sewage basin is the Fairchild Airforce Base as well as the Spokane International Airport. The Hayford pump station in this area receives mainly industrial flows from the surrounding area.

Exhibit 3.9-14. Sanitary Sewer Pump Stations In the West Plains

Station Name
Hayford
SIA

Sources: City of Spokane, 2023

Stormwater

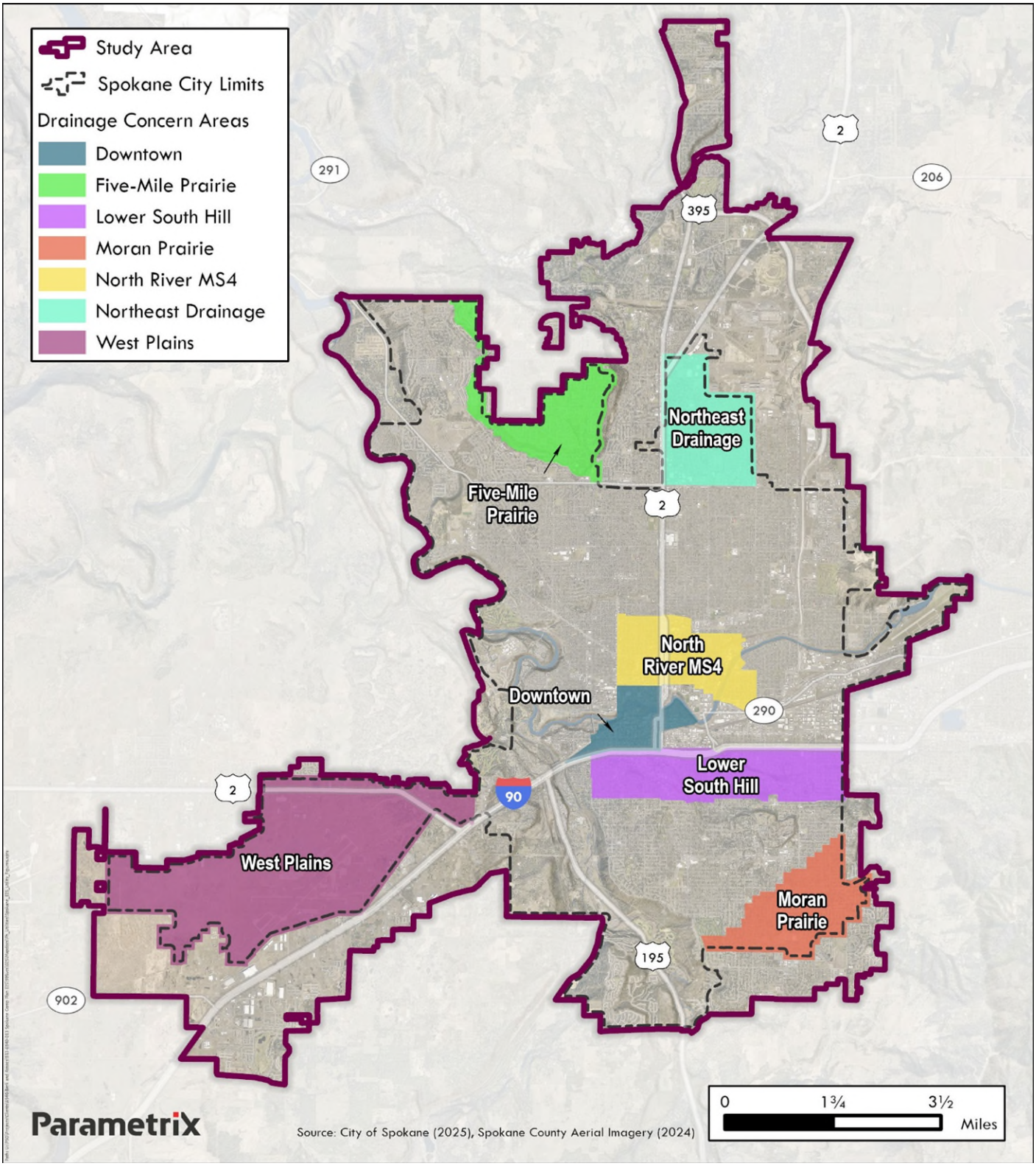
Information in this section refers primarily to the City of Spokane's Integrated Clean Water Plan from 2014, and the Stormwater Management Program Plan from 2025. For information regarding surface waters, refer to **Section 3.1 Earth, Water Quality, and Water Resources**.

The City manages a stormwater system mainly focused on collecting, treating, and infiltrating stormwater within the right of way of city streets. There are several areas where the stormwater and sanitary sewer systems are combined. These areas are typically older neighborhoods closer to the city center or in the South Spokane or Center City subareas. In areas where there are combined sewers, interceptors and combined sewer overflow tanks provide temporary storage of peak rainfall events to help prevent overloads at the treatment plant. There are also outfalls to the Spokane River in the event of extreme events to prevent flooding.

The City identified Drainage Concern Areas (DCAs), shown in **Exhibit 3.9-15** to address specific localized issues with infiltration, high groundwater, and shallow bedrock, which limit available options to manage and disperse stormwater.

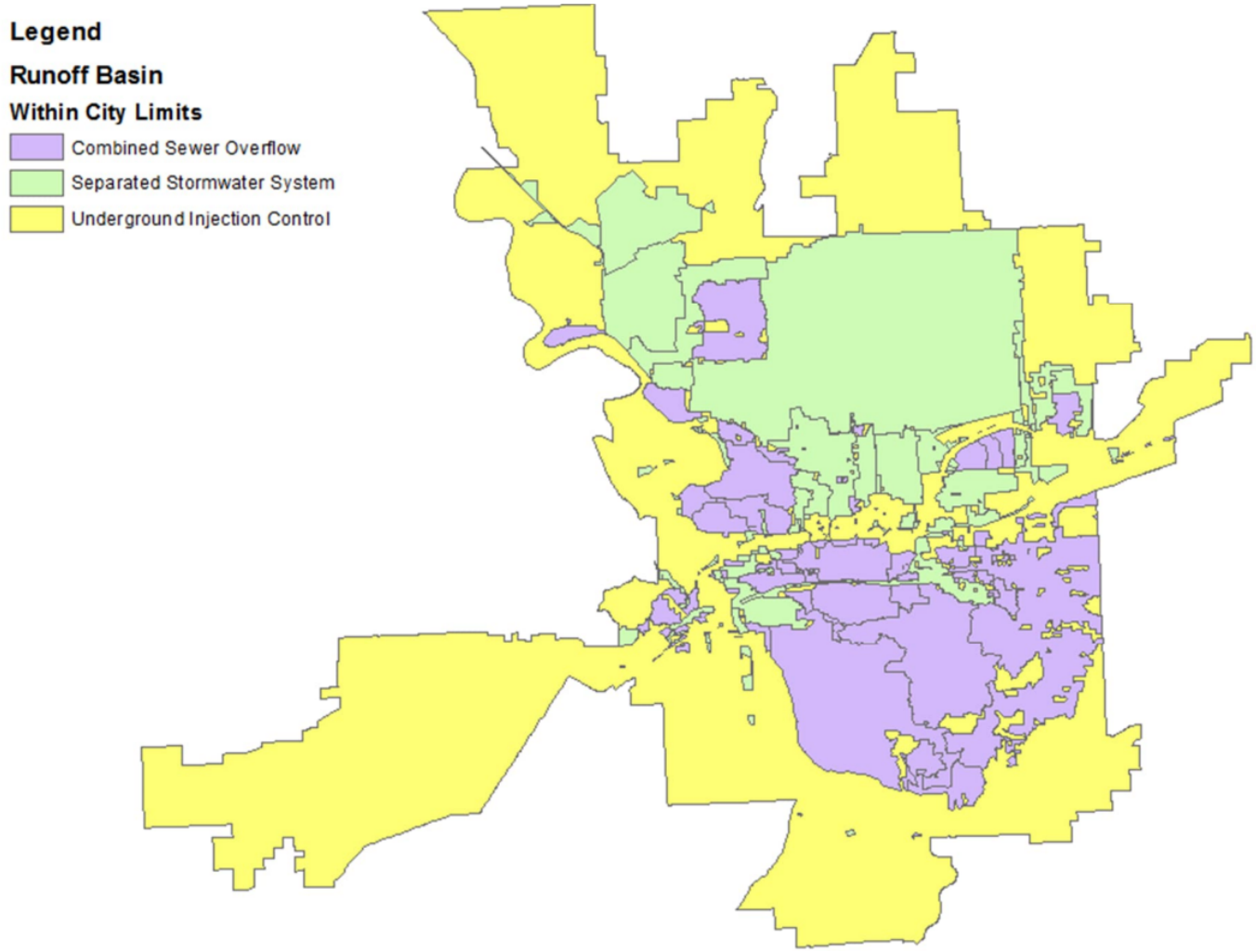
This section discusses the plans for capital improvement projects related to the CSO system within each DCA and identifies inconsistencies between the plans for the CSO and stormwater system that could result in flooding, sewer outfall events, or damage to infrastructure. A map of the CSO basins is provided in **Exhibit 3.9-16** and **Chapter ~~5~~ 6 Appendix D**. Further explanation of each study area and the relevant DCA and CSO basins is provided later in this section.

Exhibit 3.9-15. Drainage Concern Areas



Source: Parametrix 2026, City of Spokane 2026.

Exhibit 3.9-16. Map of CSO/Storm/UIC Areas



Source: CSO Annual Report, City of Spokane, 2024.

Northwest Spokane

Within Northwest Spokane, the Five Mile Prairie, and North River MS4 are the two DCAs of note. In the Five Mile Prairie, there are large areas of poorly draining soils, shallow bedrock, and high groundwater. It is also at a significantly higher elevation than the surrounding area. North River MS4 has areas of shallow bedrock and groundwater. The CSO basins in northwestern Spokane are 02, 06, 07, 10, 12, 14, 15, and 23, which are mostly located adjacent to the Spokane River except for CSO 06 (**Chapter ~~5~~ 6 Appendix D**). CSO 06 serves an area where the stormwater system has not been separated from the sewer system. The ICWP (Table 4-1) identified a need for additional storage and infiltration capacity within all CSO basins within this area except for CSO 02.

Northeast Spokane

Within Northeast Spokane the Northeast Drainage and North River MS4 are the two DCAs of note. The Northeast Drainage DCI has areas of poorly draining soils. North River MS4 has areas of shallow bedrock and groundwater. The CSO basins in Northwestern Spokane are 38, 39, 40, 41 and 42 which are all adjacent to the Spokane River. The ICWP identified a need to adjust the regulator setting at CSO 41.

Center City

Within Center City the Downtown DCA was established due to shallow bedrock and limited areas for treatment and disposal due to the amount of development. The CSO basins in Center City are 23, 25, 26, 24B, and 33 C and D. The ICWP did not identify any specific projects for this area.

South Spokane

The South Hill and South Spokane area includes the Lower South Hill and Moran Prairie DCIs. The Lower South Hill DCA has limited combined sewer pipe capacity. The Moran Prairie DCA has shallow groundwater and bedrock. The CSO basins in South Spokane are 19, 20, 24 A and B, 26, 33 A and B, and 34. The ICWP Identified needs to increase storage at CSO 24, 26, 33 and 34. The South Hill area also includes the only stormwater specific pump station that the City operates, at 35th Ave and Helena St.

West Plains

Within the West Plains area the West Plains DCA was established due to shallow bedrock and groundwater and poorly draining soils. The only CSO basin in the West Plains area is 16. The ICWP did not identify any specific projects for this area.

3.9.2 Impacts

Impacts Common to All Alternatives

Each alternative will see growth throughout the study area which will require planning and adjustment of capital improvement projects to address changes in utility demands. The City departments and Avista should plan to align the scheduling of projects to those areas where growth is anticipated to avoid any mismatches between their planned improvement projects and the chosen alternative impacts which could result in the need for additional improvements. Special consideration should be given to key infrastructure for the following utilities:

Power

- Substations
- Generators (gas, solar, hydroelectric, wind)

Water

- Wells
- Pump Stations
- Reservoirs

Sewer

- Pump Stations
- Water Reclamation Facilities
- Siphons

Stormwater

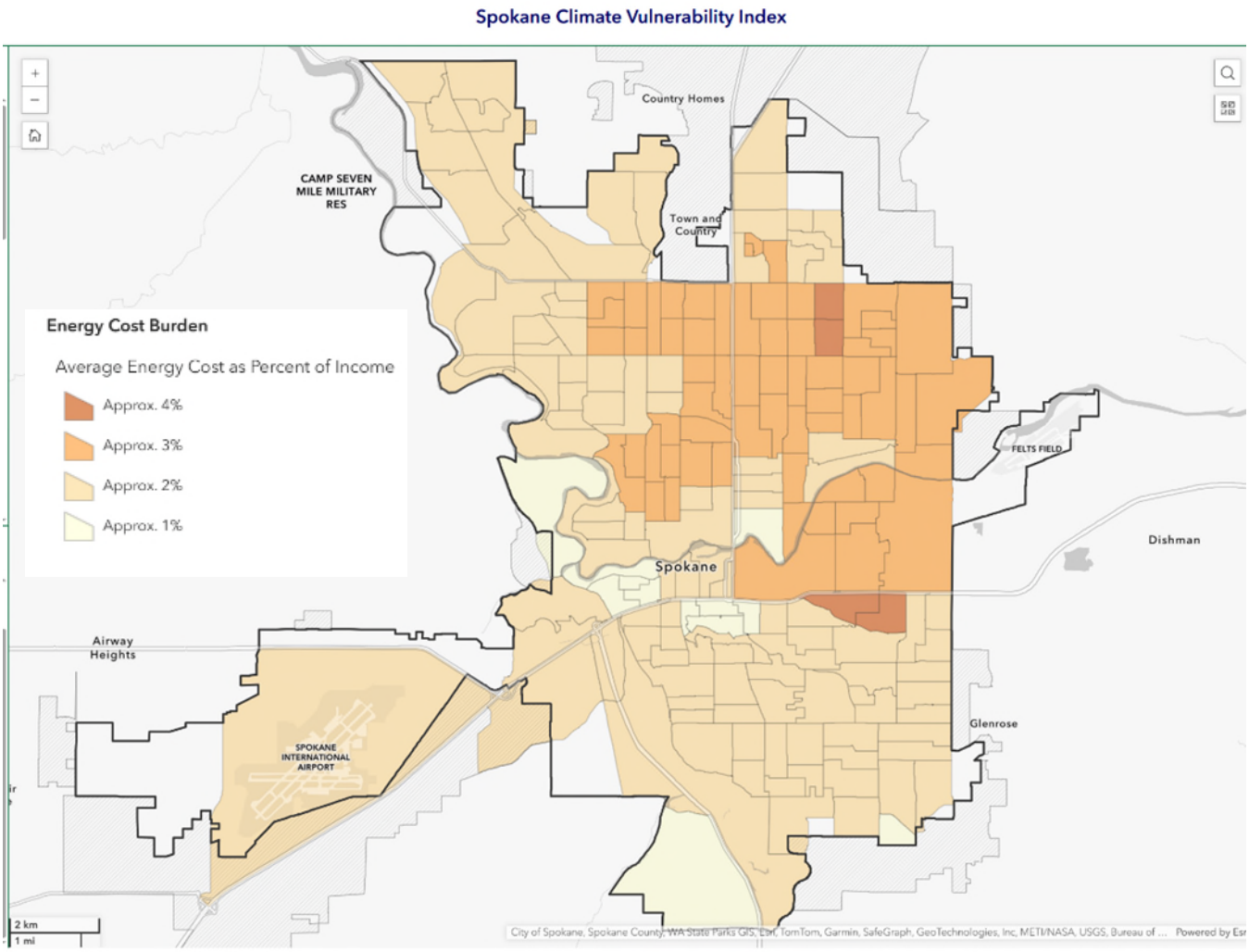
- CSOs
- Pump Stations
- Infiltration Facilities

Environmental Justice Considerations

Lower-income households may spend more of their income on energy expenses, and may live in poorly insulated housing which can result in higher energy demand. Costs to install more resilient forms of energy may be a barrier.

A household with 6% or greater energy burden is considered to be a high energy burden household. Energy cost burdens vary in Spokane with greater energy costs in Northeast Spokane and the East Central portion of South Spokane, and parts of Northwest Spokane typically along Division Corridor, though the areas overall do not reach 6%. See **Exhibit 3.9-17**.

Exhibit 3.9-17. Percent of gross household income spent on energy



Calculated by dividing the average housing energy cost by the average annual household income.
Source: (US Department of Energy, 2025)

Growth in areas with high risk and vulnerability to a changing climate such as in areas subject to flooding or urban flooding may require a greater degree of investment in improved drainage to overcome these vulnerabilities as described in the City of Spokane Climate Risk and Vulnerability Assessment, June 2025. Within the Center City area there is significant crossover between the high-susceptibility climate vulnerability index and the Downtown DCA. The Center City area should be considered for additional funding for storage and disposal to help mitigate flooding risk.

Alternative 1: No Action, Stay the Course

Power

Alternative 1 is consistent with Avista's forecasting as the utility has a plan to address growth along the current trajectory. Avista's planned growth rates in power demand are within the range shown in **Exhibit 3.9-3,** with Avista's growth at a combined 1.15% (0.91% for the first 10 years and 1.4% for the next 10 years) landing within the Moderate-High projection.

Water

Alternative 1 differs from the projections in the City's WSP (2042 horizon) based on the new projections in the updated SRTC TAZ data (SRTC up to 2050, adjusted in this EIS for 2046). While there will be an increase in water demand, the City has a plan to address needs as the system expands, which will need to be compared to the growth targets between the two projections. This alternative does have the largest growth in the single unit housing, which typically creates larger water usage peaks for irrigation in the irrigable months (April through October). Even so, the City's water system would be able to serve that projected growth.

Wastewater

There are plans in the ICWP to expand treatment capacity at the RPWRF. The difference in sewer usage between single unit and multi-unit connection depends on the density of the development; more dense clusters of single unit and multi-unit developments will see larger flows. While there will be an increase in sewer demand, the City has a plan to address needs as the system expands in Alternative 1 since it lines up with their existing plan.

Stormwater

There are plans in the ICWP to upgrade the CSO system. The City may need to develop a strategy to address or mitigate the drainage issues in each of the DCIs. There will be an increase in stormwater flows, but the City has a plan to address needs as the system expands in Alternative 1 since it lines up with their existing plan.

Alternative 2: Distributed and Balanced

Power

Alternative 2 would concentrate much of the growth around transit routes and increase mixed-use and multi-unit growth throughout the city. From a power distribution standpoint, if there are more concentrated users, this should increase the efficiency of the power network and reduce total usage. This may result in the need to upgrade existing infrastructure to address growth in the areas surrounding the transit routes.

Water

Similar to the impacts noted in the Power section, concentrating growth along corridors under Alternative 2 would be a net benefit to a water system. However, as WSP assumptions do not show the same level of growth around the Wellesley and Francis Corridors, the City may need to upgrade existing infrastructure or construct new infrastructure to support growth in those areas.

Alternative 2 increases the mixed-use and housing density along Northwest Blvd, Francis Ave, and Wellesley Ave, which could increase the need for production in the Low and North Hill pressure zones which only showed an increase of 0.60% and 0.59% in flow per ERU per year (see **Exhibit 3.9-7**), respectively. Since the production wells are predominantly in this zone, the production capacity may need to be expanded in these zones.

As with water production there is also a potential mismatch between the storage capacity in the Low and North Hill pressure zones between Alternatives 1 and 2. As noted above, there may be additional storage needs in the areas surrounding Northwest Blvd, Francis Ave, and Wellesley Ave.

Wastewater

Concentrating growth along corridors may be a net benefit to a utility, but the plan for growth should be compared to where limiting infrastructure is located, such as siphons, pump stations, and the water reclamation facility. With growth in Alternative 2 increasing along the Northwest Blvd, Francis Ave, and Wellesley Ave corridors, as well as in the West Plains, this could result in the need to expand capacity at the Francis and Cannon and Clarke Ave pump stations as well as the Latah Creek Siphon. Francis and Cannon and Clarke Ave Pump Stations and the Latah Creek Siphon are currently being discussed for upgrades/replacements and should be further evaluated if more growth is planned in the West Plains and along Francis than is currently allotted.

Stormwater

Alternative 2 converts much of the growth into mixed-use and multi-unit developments which could reduce the stormwater generated overall. There are a few DCIs which the growth either happens adjacent to or near, but all of them are already developed, and the planned development is not likely to increase the stormwater generated so long as the City maintains their existing stormwater mitigation standards for both private and public developments.

Alternative 3: Center City and Regional Hubs

Power

Alternative 3 would concentrate much of the growth in the downtown area and increase the mixed-use and multi-unit growth throughout the city. From a power distribution standpoint, if there are more concentrated users, this should increase the efficiency of the power network and reduce total usage.

This higher concentration in these central areas may require additional generation or transmission capacity.

Water

Similar to the impacts noted above in the Power section, concentrating growth in a central area is a net benefit to a water system. However, this concentrated growth may require expansion of transmission, production, and storage in the Low, North Hill, Intermediate, High, and Top Pressure zones.

Wastewater

Concentrating growth along corridors may be a net benefit to a utility, but the plan for growth should be compared to where limiting infrastructure is located such as siphons, pump stations, and the water reclamation facility. With growth in Alternative 3 increasing downtown, as well as in the West Plains, this could require improvements to the Post Street Bridge Trunk Line and Clarke Ave pump station, as well as the Latah Creek Siphon.

Stormwater

Alternative 3 concentrates most of the growth in the downtown core where there is already a lot of development. Since redevelopment is unlikely to increase stormwater runoff, other than maintaining the existing stormwater mitigation standards, no further action is likely needed.

Preferred Alternative

NOTE: *Analysis for the Preferred Alternative was added below with the Final EIS.*

Power

The Preferred Alternative, as a combination of the other three alternatives, would concentrate much of the growth around transit routes and major hubs like the Center City, and increase mixed-use and multi-unit growth throughout the city. From a power distribution standpoint, if there are more concentrated users, this should increase the efficiency of the power network and reduce total usage. This may result in the need to upgrade existing infrastructure to address growth in the areas surrounding the transit routes and in the city core.

Water

Similar to the impacts noted in the Power section, concentrating growth along corridors under the Preferred Alternative would be a net benefit to a water system. However, as WSP assumptions do not show the same level of growth around the Wellesley and Francis Corridors, the City may need to upgrade existing infrastructure or construct new infrastructure to support growth in those areas as

well as a potential need for expansion of transmission, production, and storage in the Low, North Hill, Intermediate, High, and Top Pressure zones.

The Preferred Alternative increases the mixed-use and housing density along Northwest Blvd, Francis Ave, and Wellesley Ave, which could increase the need for production in the Low and North Hill pressure zones which only showed an increase of 0.60% and 0.59% in flow per ERU per year (see **Exhibit 3.3-7**, respectively. Since the production wells are predominantly in this zone, the production capacity may need to be expanded in these zones.

As with water production there is also a potential mismatch between the storage capacity in the Low, North Hill, Intermediate, High, and Top Pressure zones, between Alternatives 1 and the Preferred Alternative. As noted above, there may be additional storage needs in the areas surrounding Northwest Blvd, Francis Ave, and Wellesley Ave.

Wastewater

Concentrating growth along corridors may be a net benefit to a utility, but the plan for growth should be compared to where limiting infrastructure is located, such as siphons, pump stations, and the water reclamation facility. With growth in the Preferred Alternative increasing along the Northwest Blvd, Francis Ave, and Wellesley Ave corridors, as well as in the West Plains and central city, this could result in the need to expand capacity at the Francis and Cannon and Clarke Ave pump stations as well as the Latah Creek Siphon and the Post Street Bridge Trunk Line.

Stormwater

The Preferred Alternative converts much of the growth into mixed-use and multi-unit developments and concentrates more growth in already developed areas like the central city which could reduce the stormwater generated overall. There are a few DCIs which the growth either happens adjacent to or near, but all of them are already developed, and the planned development is not likely to increase the stormwater generated so long as the City maintains their existing stormwater mitigation standards for both private and public developments and prioritizes stormwater separation from combined sewer systems.

Maximum Development Scenarios

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

Both the No Action and Preferred Alternative have maximum potential development above the targeted growth as described in **Chapter 2**. The impacts described under Impacts Common to All Alternatives, that growth throughout the study area will require planning and adjustment of capital improvement projects to address changes in utility demands, apply and could be accelerated if maximum growth were to occur rather than the targeted growth that is based on the State OFM's most likely growth trend.

The Preferred Alternative could increase the capacity for housing above the No Action Alternative by 17% and associated population by 14%, in the Future Land Use Change areas (**Chapter 2, Exhibit 2.4-20**) largely along frequent transit corridors and in already developed locations. Under the Preferred Alternative there is more opportunity to concentrate the development in the Future Land Use Map change areas that lie along corridors and hubs that have higher levels of existing development; the description of potential distribution of growth in relation to planned utilities under the Preferred Alternative described above would apply and could be intensified if growth occurred at the maximum potential development level. Under the Preferred Alternative there would also be improved climate, capital facilities, and other policies and development regulations addressing energy and water conservation and capital facilities meeting anticipated growth. Requirements for adequate water and sewer facilities and services would ensure that capacity is available at the time of growth; if it is not available, growth would not be permitted. Regular updates to water, wastewater, and stormwater utility plans will also ensure advancement of utilities to respond to growth.

3.9.3 Mitigation Measures

Incorporated Plan Features

While the alternatives do not specifically discuss utilities, the City's Comprehensive Plan does include a section on utilities that lists the policies, goals, and regulations that are set to provide safe, reliable, and equitable service that addresses growth throughout the city; protect water quality; advocate for water conservation; encourage energy efficiency; and revitalize the community. These policies include City programs to reduce water use through grants for low water use landscaping, requirements for onsite stormwater treatment, disposal for new developments, and targeting infrastructure improvements in historically underserved areas. The City plans to update its level of service standards for water service to better align with the Washington Department of Health's (DOH) standards. Their current standard targets meeting 45 pounds per square inch (PSI) of pressure at a minimum. The DOH standard better targets pressures with system flows like a minimum service pressure of 30 PSI during the maximum day flow as well as meeting required minimum fire flows at 20 PSI. Updating this standard will allow the City to better align its goals with state regulatory standards.

Regulations and Commitments

Electrical

Federal

- National Electrical Code, as adopted by the National Fire Protection Association

State

- 2019 Washington State Clean Energy Transformation Act, amending portions of RCW Titles 19 (Business Regulations – Miscellaneous), 43 (State Government – Executive), 80 (Public Utilities), and

82 (Excise Taxes) to commit Washington to an electricity supply free of greenhouse gas emissions by 2045.

- Washington State Energy Code, WAC Title 51, Chapters 11C and 11R

Local

- Electric Service Requirements administered by Avista

Drinking Water

Federal

- Safe Drinking Water Act, 42 USC 300 et seq., Chapter 6A, administered but the U.S. Environmental Protection Agency

State

- Water Systems, WAC Title 246, Chapters 290-296, administered by the Washington State Department of Health

Local

- Public Utilities and Services, Spokane Municipal Code Title 13 Chapter 13.04 – Water
- City of Spokane Design Standards

Wastewater

Federal

- National Environmental Policy Act United States Code (USC) 4321 et seq.
- Clean Water Act, 33 United States Code (USC) 1251 et seq., including Section 402 – National Pollutant Discharge Elimination System (NPDES)

State

- State Environmental Policy Act (SEPA) RCW Title 43.21C; WAC 197-11
- Washington State Department of Ecology, WAC Title 173, Chapters 200-270, which includes administration of the NPDES program, discharge and effluent standards, the waste discharge general permit program, construction of wastewater treatment plants, and construction and operation of combined sewer overflow reduction facilities
- NPDES Wastewater Discharge Permit program, administered by the Washington State Department of Ecology
- Wastewater Collection System Consent Decree, administered by the Washington State Department of Ecology and U.S. Environmental Protection Agency

Local

- Public Utilities and Services, Spokane Municipal Code Title 13 Chapter 13.03 – Sewers
- City of Spokane Design Standards

Stormwater

Federal

- Clean Water Act, 33 USC 1251 et seq., including Section 402 – National Pollutant Discharge Elimination System
- Endangered Species Act, 16 USC 1531 et seq.

State

- National Pollutant Discharge Elimination System (NPDES) Western Washington Phase I Municipal Stormwater General Permit, administered by the Washington State Department of Ecology
- NPDES Industrial Stormwater General Permit, administered by the Washington State Department of Ecology
- Stormwater Management Manual for Eastern Washington, administered by the Washington State Department of Ecology
- Washington State Hydraulic Code, WAC Title 220, Chapter 660, administered by the Washington Department of Fish and Wildlife

Local

- Public Utilities and Services, Spokane Municipal Code Title 13 Chapter 13.03 – Sewers
- Spokane Municipal Code Chapter 17D.060 Stormwater Facilities
- City of Spokane Design Standards
- Spokane Regional Stormwater Manual

Other Potential Mitigation Measures

While each alternative has the potential to impact utilities through increased demand, none of these impacts are identified as significant adverse impacts. City codes regulating construction and future utility investments will continue to ensure new development addresses any service or capacity constraints.

As described under action alternatives, compact growth can benefit efficiency of the utility systems and reduce total usage. For example, the U.S. EPA has documented that compact growth, by reducing service line lengths and outdoor irrigation demands, can reduce infrastructure costs and reduce residential water demand over lower-density patterns. (US EPA, 2006)

The City and Avista regularly plan and adapt to changing growth patterns and are currently engaged in efforts to improve the water system and address long-term demand and climate change effects on

water supplies and the aquifer, address wastewater and drainage system capacity, meet electrical demand, and increase the resiliency of their utility systems to growth and impacts of climate change.

Some recommendations in the June 2025 Climate Risk and Vulnerability Assessment include:

- Consider expanding local energy resources. An example includes: Maximize renewable energy sources for the supply of electricity and heat to new and existing buildings.
- Invest in public infrastructure to improve energy efficiency.
- Invest in upgrading gray and green infrastructure.
- Minimize runoff. This could include requiring the use of green infrastructure and low-impact development to address increased storm intensities and stormwater runoff.
- Continue to transition areas with combined sewers to separate stormwater and sewer facilities.
- Protect critical aquifer recharge areas.
- Implement community-based water use efficiency.

~~3.9.1~~3.9.4 Significant Unavoidable Adverse Impacts

None of the alternatives are anticipated to create significant unavoidable adverse impacts to the ability of the City or Avista to deliver utility services to the population of Spokane. While there are some inconsistencies between areas targeted for future growth and planned infrastructure improvements or expansion areas, the City and Avista regularly review changes in growth patterns and are actively engaged in efforts to improve wastewater and drainage system capacity and reduce water consumption and electrical demand. City codes regulating construction and future utility investments will continue to ensure new development addresses any service or capacity constraints.

4 Responses to Comments



4.1 Overview

NOTE: *This chapter is new in the Final EIS.*

This chapter provides responses to comments on the Draft Environmental Impact Statement (EIS).

It includes the following:

- Overview
- List of Commenters
- Written Comments and Responses
- Comment and Responses Matrix

The marked comment letters are included in **Appendix 6.G**.

4.2 List of Commenters

Approximately 203 written comment letters were received during the comment period December 18, 2025 to February 18, 2026, extended to March 5, 2026. **Exhibit 4.2-1** lists the Tribes, Agencies and Organizations and **Exhibit 4.2-2** lists individuals. Agency names and last names are listed as appropriate.

Exhibit 4.2-1: 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

#	Date	Organization	Type	Commenter
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
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

Exhibit 4.2-2: 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

#	Date	Name
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

#	Date	Name
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
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

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

4.3 Response to Common Comment Themes

This section provides responses to themes in comments.

- Theme 1: Tree canopy and habitat / concern about environmental review
- Theme 2: Support for streamlined environmental review
- Theme 3: Infill
- Theme 4: Mixed use development
- Theme 5: Affordable housing
- Theme 6: Parks, libraries, and public spaces
- Theme 7: Transit and infrastructure
- Theme 8: Parking
- Theme 9: Water
- Theme 10: VMT and Emissions and climate planning
- Theme 11: Role of Neighborhood Councils

These responses are referenced in the Comments and Responses Matrix in **Section 4.4 Comment and Responses Matrix**.

Theme 1: Tree canopy and habitat / concern about environmental review

Subtheme: Concern about destruction of trees and concern that City will not be able to meet tree canopy goals

Related comment letters: 12, 13, 17, 20, 25, 26, 28 and similar.

Common topics: Support for protection of habitat and natural lands; concern that plan does not help the City achieve 30% tree canopy goal by 2030; concern that not enough attention is paid to SpoCanopy program and more resources should go to urban forestry. Concern about mixed-use retail in the middle of neighborhoods previously designated R-1, and lack of parking requirements for new housing, increasing threats to trees; concern that small lots do not have sufficient space for large trees; recommendation for development to be subject to minimum tree planting or payment to urban forestry program, support for an enforceable critical areas ordinance.

Response: Impacts to trees and habitat are described and evaluated in Final EIS **Section 3.3**, Plants and Animals. The analysis finds that all alternatives would provide opportunities for development within currently vegetated areas and therefore have the potential to impact habitat and trees. Compared to Alternative 1 (the No Action Alternative), the Preferred Alternative concentrates more housing in Center City and areas with access to high-capacity transit, which are currently developed, and less housing in the Spokane neighborhoods that contain substantial pockets of priority habitat and tree cover. Potential mitigation measures, in addition to existing state, federal, and local regulations and plans, include increasing resources for the SpoCanopy program, creating additional

incentive programs, identifying lands for potential acquisition for parks or natural lands, and updating code language related to mitigation and limiting clearing and soil disturbance. In addition, through BUILDSpokane, the City is proposing to add detail to landscaping requirements and expand tree preservation incentives. As described in Final EIS **Section 3.3.3**, existing regulations for shoreline areas, wetlands, and stream buffers would mitigate impacts to habitats and fish. Critical areas regulations are also being reviewed and updated with the 2026 Comprehensive Plan Periodic Update.

Subtheme: Opposition to SEPA infill exemption

Related Comment Letters: 13, 20, 111, 121 and similar

Common topics: Concerned about SEPA infill exemptions and pace of development in exemption areas thinking that exempted development would not protect trees, critical areas (wetlands, habitat, and riparian areas) in neighborhoods; infill exemption should only be allowed for areas already mostly disturbed.

Response:

The City is considering raising SEPA exemption limits citywide as well as an infill exemption in a phased manner (EIS **Chapter 6, Appendix E**). The infill exemption could be applied first in areas near frequent transit routes and largely in areas with impervious surfaces and existing development, and later when more capital facilities and other planning is completed, would be applied in lesser developed areas. As described in EIS **Chapter 6, Appendix E**, SEPA-exempt development is still subject to all city codes that protect critical areas (SMC 17E.010 to 040 and 070), shorelines (SMC 17E.060), stormwater management and drainage concern areas (Chapter 17D.060 Stormwater Facilities, Section 17D.060.135 Areas of Drainage Concern), landscaping and tree canopy (Chapter 17C.200 Landscaping and Screening), and many other standards relating to transportation, utilities, cultural resources, and more. The City is updating its critical areas regulations to match Growth Management Act (GMA) requirements, and through BUILDSpokane, the City is proposing to add detail to landscaping requirements and expand tree preservation incentives.

Subtheme: Support for policies on protecting habitats and open spaces.

Related Comment Letters: and similar

Common topics: Support for Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4 related to habitat and critical area protection and acquisition.

The Preferred Alternative incorporates updated policy recommendations that address protection of habitats and open spaces. The August 2026 Natural Environment chapter includes the following policy based on CRSB's Policy Land Use and Zoning 2-4.

> *Policy: NE-9.6, Interconnected Natural Systems: 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.*

In addition, the draft Natural Environment Chapter includes a map of priority areas for conservation.

Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.

Subtheme: Concern about flooding and pollution due to tree loss

Related Comment Letters: 23, 128 and similar **Common topics:** Concern about flood potential near wetlands; concern for impacts to Spokane River and wanting to protect it.

Response: Impacts to water resources are described and evaluated in Final EIS **Section 3.1 Earth**, Water Quality, and Water Resources. The analysis finds that all alternatives would result in construction impacts to water, potential for increased pollution, and potential for increased rainfall runoff flows. The Preferred Alternative is a combination of Draft EIS Alternatives 2 and 3, which were determined to have lower impacts than Alternative 1 (the No Action Alternative) due to the form and location of growth. Higher density of development in already developed areas has lower impacts than low density development or development in areas with more habitat and trees. Where redevelopment would trigger new stormwater infrastructure, that infrastructure could also be designed to be more resilient to changes in rainfall and therefore lower flood risks and pollution into the Spokane River and other water bodies. Other potential mitigation opportunities, in addition to existing state, federal, and local regulations and plans, include installing updated stormwater controls on roadways, prioritizing opportunities to restore critical area buffers, improving tree canopy, avoiding adding new roadways, and updates to environmental codes.

Subtheme: Recommendation for a tree and habitat inventory

Related Comment Letters: 26, 27, 28 and similar

Common topics: Recommendation that City inventory tree canopy, habitat, and natural lands.

Response: This is discussed as a potential mitigation measure in Final EIS **Section 3.1**: "Identify, protect, and restore tree canopy – especially in stream and river buffers" and Final EIS **Section 3.3**: "consider opportunities to identify and acquire undeveloped land in key areas."

In addition, the August 2026 draft Natural Environment Element includes the following policy:

> *Policy: NE-15. 3, Ecosystems Inventory Database: Maintain an inventory of existing and potential natural lands, fish and wildlife habitat, urban forest, and natural infrastructure in the city's Geographic Information System, evaluated for their ecological and climate resilience values, and disseminate the information for decision-makers and the public in a useable, interactive format.*

Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers. Also see proposed policy NE 9-6 under "**Subtheme: Opposition to infill exemption**."

Theme 2: Support for streamlined environmental review

Related comment letters: 87, 153, 185 and similar

Common topics: Adopt the maximum possible SEPA exemption for infill development; streamline permit development; provide SEPA exemption for all non-industrial projects; only focus environmental review on clean air and clean water to reduce pressure on resources.

Response: Comments noted. The Preferred Alternative includes a SEPA infill exemption where the Environmental Impact Statement (EIS) provides upfront evaluation of residential and mixed-use growth along frequent transit routes, and documents plans or development regulations that provide mitigation measures. The City may also raise SEPA thresholds citywide (WAC 197-11-800) or in targeted areas in the city. This would support streamlined environmental review, which helps to facilitate desired growth in priority locations by providing predictability in costs and process for developers. As described in **Chapter 6, Appendix E**, SEPA-exempt development is still subject to all city codes making SEPA review unnecessary for common residential and mixed-use development given other requirements and review processes and reducing costs to develop housing affordable to a range of incomes which is a concern in Spokane and across the state. Also see "**Subtheme: Opposition to infill exemption**" under Theme 1.

Theme 3: Infill

Related comment letters: 72, 83, 87 and similar

Common topics: Growth should focus in existing neighborhoods rather than sprawl; infill should be done in areas that already have substantial impervious surface or are mostly disturbed; ensure infill projects are designed to be compatible with surrounding uses; support removing single-family zoning

Response: Comments noted. The Preferred Alternative is a blend of Alternatives 2 and 3. It includes moderate-high density near frequent transit lines and in areas with planned transit investments, including downtown, and increased mixed-use and commercial uses downtown and throughout the city. It also supports infill through raising SEPA thresholds citywide and a SEPA infill exemption, phased as described under "**Subtheme: Opposition to infill exemption**" under Theme 1. The critical areas regulations protect functions and values of wetlands, riparian areas, and fish and wildlife habitat conservation areas. The greater densities and transportation investments in already developed areas and the requirements to protect critical areas encourages development in existing developed areas rather than on properties with more vegetation and open space, reducing sprawl. Middle housing types, such as duplexes and triplexes, are already allowed in all residential zones except the Residential Agricultural Zone, which is only applied in one small area of the city. Spokane's municipal code contains regulations for land use and urban form. Standards address height, including transitions between more intense and less intense zones, building coverage, blank walls, roof forms, landscaping, screening, and more. These regulations as well as existing supporting policies and programs would serve to mitigate impacts associated with the alternatives.

Theme 4: Mixed use development

Subtheme: Walkability

Related comment letters: 29, 87, 105 and similar

Common topics: Concern that none of the proposed alternatives deliver walkability and reduced VMT; concern about increased density without walkability improvements; suggest safe/pleasant

destinations and housing near employment; suggest human scale design; suggest more intensity of services near residential and neighborhood mixed use.

Response: The Preferred Alternative is a blend of Alternatives 2 and 3. It includes moderate-high density near frequent transit lines and in areas with planned capacity, including downtown, and increased mixed-use and commercial uses downtown and throughout the city. This land use mix is intended to support walkability, access to services and jobs, and reduced VMT. Potential mitigation measures in the Draft EIS in **Sections 3.4.3** and **3.7.3** discuss opportunities to improve walkability.

It should also be noted that VMT is influenced in the city by land use and investments in transit and multimodal improvements but also by regional transportation investments in freeways and regional traffic.

Subtheme: Input on Retail in Residential Neighborhoods

Related comment letters: 180 and similar

Common topics: Concern that there has not been enough input on retail in residential neighborhoods.

Response: Specific code updates related to neighborhood commercial uses will be considered after the Comprehensive Plan is adopted and will have a public process with opportunities for comment. Neighborhood corner stores/cafes were the top commercial type for community members who participated in the Community Visioning Survey and who engaged in the March 2025 Community Visioning Workshop Series for the Comprehensive Plan Periodic Update.

Comments on policies that are part of the action alternatives are noted. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.

Theme 5: Affordable housing

Related comment letters: 12, 13, 59 and similar

Common topics: Need for more affordable housing; need more affordable housing downtown; concern that the plan does not do enough to address affordable housing; desire to see more plans to incentivize affordable housing; recommendation for a study to determine if infill development is supporting affordability.

Response: Final EIS **Section 3.5.2** discusses capacity for housing targets, including targets by income band. The Preferred Alternative is a combination of Alternatives 2 and 3 and meets capacity for the housing targets. It directs much of the housing growth near frequent transit lines and within areas with planned transit capacity, including downtown. The Preferred Alternative also includes new housing and land use policies that support affordability as discussed in Final EIS **Exhibit 3.5-33**. With increased housing capacity in the Preferred Alternative above the No Action Alternative, the City can increase the housing supply and reduce the competition for available units, which is expected to reduce pressure on market rate housing rents and prices. It is likely that some infill, such as townhomes and multiplexes, would not directly serve incomes below 80% area median income (AMI).

This is assumed in the capacity analysis in **Section 3.5.2**. However, an increase in supply of housing for moderate incomes could reduce down-renting, when people occupy units that are less expensive than what they can afford, potentially opening up those less expensive units for households with lower incomes. Multifamily infill development is more likely to directly serve households with lower incomes and these housing types would also be encouraged in zones in which it is allowed through new zoning standards and the SEPA threshold changes and infill exemption. Other strategies to incentivize subsidized affordable units and preserve naturally occurring affordable units are under consideration for the Comprehensive Plan Periodic Update and discussed in Final EIS **Sections 3.5.2 and 3.5.3**.

Comments on policies that are part of the action alternatives are noted. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.

Theme 6: Parks, libraries, and public spaces

Related comment letters: 72, 79, 92 and similar

Common topics: The City should continue investing in parks; neighborhoods should have safe public spaces; libraries are important; green spaces and parks should remain free; land use code should include preserved or park areas; code should have minimum greenspace requirements; City should partner with parks and schools

Response: Comments noted. The Draft EIS considers impacts to parks and libraries in **Section 3.8 Public Services**. The Preferred Alternative is a combination of Alternatives 2 and 3.

Comments on policies that are part of the action alternatives are noted. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers. The City's Parks and Natural Lands Master Plan also includes its own policies to support park development to meet current and future City needs.

The BUILDSpokane code update effort is addressing landscaping and trees as noted in the description of the Preferred Alternative in Final EIS **Chapter 2**. Also see the BUILDSpokane page: https://my.spokanecity.org/projects/buildspokane-code-modernization-project/.

Theme 7: Transit and infrastructure

Related comment letters: 4, 5, 12, 13 and similar

Common topics: The City should ensure that population and housing growth will grow at pace with transit service and roadway capacity; support for concentrating growth in centers, corridors, and other locations where existing infrastructure and transit investments can be better utilized.

Response: The Draft EIS evaluates transportation and public infrastructure impacts associated with future growth using land use forecasts, transportation modeling, and infrastructure planning assumptions. The Preferred Alternative combines elements of Alternatives 2 and 3 and directs a greater share of future housing and employment growth to Downtown, Urban Hubs, and other areas with existing or planned transportation facilities, utilities, services, and transit access. This approach

supports a more efficient use of public infrastructure, helps reduce vehicle miles traveled, and increases opportunities for walking, bicycling, and transit use.

The Draft Comprehensive Plan includes policies supporting coordination with Spokane Transit Authority (such as policy TR-4.3), multimodal transportation improvements, complete streets, transportation demand management strategies, and continued investment in multimodal infrastructure. While the City does not directly control transit service levels or specific public transportation investments, the Plan supports land use patterns that make transit service and other multimodal investments more viable and effective over time. Comments regarding future transit routes, service levels, bicycle facilities, sidewalk improvements, roadway projects, infrastructure funding, and transportation technologies will be shared with decision-makers and considered during implementation of the Comprehensive Plan and future transportation planning efforts.

Regarding vehicle capacity, the EIS assessed whether action alternatives would exceed thresholds for significant impacts. Compared with the No Action Alternative, the action alternatives would maintain or modestly improve mode share and reduce VMT per capita, resulting in slight improvements or no change in transit, freight, and safety performance. They would not cause additional intersections to fall below standards, and at intersections already below the LOS standard under No Action, the action alternatives would add less than 5 seconds of average control delay. The action alternatives would maintain all evaluated state facility segments below a volume-to-capacity (v/c) ratio of 1.0 and would not degrade pedestrian or bicycle operations citywide. Therefore, based on the applicable significance thresholds, studied action alternatives are not expected to result in a significant adverse transportation impact relative to the No Action Alternative.

Theme 8: Parking

Related comment letters: 111, 120, 141 and similar

Common topics: Concern that reducing or eliminating parking requirements could increase on-street parking demand in surrounding neighborhoods and that this may result in challenges with spillover parking, congestion, neighborhood livability, and emergency access.

Response: Several commenters expressed concern that reduced parking requirements could create parking shortages or increase parking demand in surrounding neighborhoods. Parking requirements and parking management strategies are implementation-level matters addressed through development regulations.

The Comprehensive Plan and related development regulations are intended to allow flexibility in parking supply, not prohibit parking. Lower minimum parking requirements would not prevent developers from providing parking where market demand exists, taking into consideration a project's location, access to transit and services, housing affordability considerations, and development context. Excess parking can increase development costs, reduce land available for housing and open space, and utilize valuable space in the right-of-way. While reduced parking requirements could result in some short-term spillover into nearby neighborhoods, they may also support longer-term shifts toward walking, biking, rolling, and transit.

Theme 9: Water

Related comment letters: 12, 18, 23 and similar

Common topics: Ensure that EIS addresses protection of shorelines, floodplains, and aquifer recharge areas and require development that incorporates river-friendly stormwater management, low-impact development/green infrastructure, and protection of riparian buffers to prevent sediment and nutrient loading; concerns that the EIS does not include discussion of regional aquifer system; requests for additional study, monitoring, and protection of the Spokane Valley-Rathdrum Prairie Aquifer and the regional aquifer system in general; concern regarding PFAS contamination, especially in the West Plains area, and request that the EIS provide more detailed examination of the alternatives in consideration of this contamination.

Response: **Section 3.1.1** Earth, Water Quality, and Water Resources - Affected Environment identifies potentially affected shorelines, floodplains, and aquifer recharge areas in the study area. As stated in **Section 3.1.2** Impacts and **Section 3.1.3** Mitigation Measures, future development associated with the selected alternative would have to comply with applicable regulations, which encompass critical area protections, river-compatible stormwater management, protection of riparian buffers, and the use of low impact development approaches.

Aquifers (including the Spokane Vally-Rathdrum Prairie Aquifer) are addressed in the EIS in the following **Sections: 3.1.1** Water Resources - Groundwater Resources, **3.1.2** Impacts, and **3.1.3** Mitigation Measures. In addition, **Exhibit 3.1-12** has been updated in the Final EIS to reflect the expansion of the Spokane Valley Rathdrum Prairie Aquifer Protection Area to include all areas within the city boundary per a 08/05/2025 ballot measure. Ongoing efforts by the City to support continued studies, monitoring, and protection of groundwater conditions as documented on the Public Works & Utilities website here https://my.spokanecity.org/publicworks/water/quality/ and through partnerships with other water stewards listed on the City's Water-Wise webpage here https://my.spokanecity.org/publicworks/water/water-wise-spokane/.

PFAS monitoring results in West Plains are presented in **Exhibit 3.1-13** and **Exhibit 3.1-14**, and citywide monitoring results have been added to **Exhibit 3.1-12**. Comparison of expected impacts from the alternatives in the West Plains area is presented in **Exhibit 3.1-20**; and as stated in **Section 3.1.2** Impacts and **Section 3.1.3** Mitigation Measures, future development associated with the selected alternative would have to comply with applicable regulations, which include drinking water and hazardous soil protection measures in areas of PFAS contamination. Efforts by the City to address PFAS contamination – while outside of the scope of this EIS – can be found at https://my.spokanecity.org/publicworks/water/quality/.

Theme 10: Air quality/Greenhouse Gas and Climate Planning

Subtheme: Calculation of GHG emissions and Electric Vehicles

Related comment letters: 12, 18, 142, 196 and similar

Common topics: Need for clarity and transparency in how emissions were modeled and how different mandates and ordinances would impact projected emissions.

Response: To better understand the relationship between emissions and local EV adoption, three scenarios were modeled: high EV adoption, where vehicles are replaced every 15 years; moderate EV adoption, where vehicles are replaced every 25 years; and a current mix scenario, where the existing ratio of EVs to combustion vehicles remains unchanged. Modeling these scenarios helps account for uncertainty in the pace of EV adoption within the City.

While the differences between alternatives are relatively small at the citywide level, **Section 3.2** was updated to describe how the alternatives could affect air quality and other environmental conditions at the neighborhood level. Transit contributes relatively little to overall emissions because transit accounts for approximately 1% of VMT within the City.

Subtheme: Wildfire Smoke/Hazards and Evacuation, Availability of Insurance

Related comment letters: 142, 201, 202

Common topics: Concern about accounting for wildfire smoke in poor air quality. Concern about adequate access and emergency services including evacuation, including as the city grows and infills.

Response: Final EIS **Section 3.2** identifies wildfire smoke as a contributor to poor air quality.

Other wildfire-related considerations, such as evacuation routes are addressed in the City's Climate policies including new policies on evacuation are part of the action alternatives, and that build on the City's existing plans and procedures; see **Section 3.2.3** for existing plans and codes as well as a summary of new policies.

The City reviews new development for adequate access, application of fire and building codes, and more.

The status of homeowners insurance is outside the scope of the EIS. (WAC 197-11-448)

Theme 11: Role of Neighborhood Councils

Related comment letters: 12, 83 and similar

Common topics: What role do the Neighborhood Councils and Community Assembly have in the selection of the preferred alternative?; concern that the EIS does not meaningfully incorporate Neighborhood Councils or Community Assembly in decision-making; EIS references outdated or nonexistent neighborhood action plans; request for more analysis and consultation with Neighborhood Councils.

Response: The City has invited all residents, property owners, businesses and advocacy groups, agencies, and Tribes to participate in PlanSpokane 2026 which has included participatory open houses, listening sessions, meetings, surveys, and comment periods including the EIS comment periods during scoping and the Draft EIS. The role of the Community Assembly and Neighborhood Councils in this

process is to provide input through these channels. The City updated the Community Assembly about PlanSpokane 2026 and comment opportunities in 2025 and 2026 as further described below.

The Plan Commission and City Council held hearings on a Preferred Alternative. The GMA and City charter and code provides roles and responsibilities and the Plan Commission has the primary responsibility for the period update recommendations and the City Council for ultimate adoption. The City Charter recognizes Neighborhood Councils as advisors. Neighborhood Councils were directly contacted about workshops and the DEIS public comment period. Neighborhood Councils are notified along with agencies during notification processes. Planning coordinated with the Office of Neighborhood Services to regularly share engagement opportunities with Neighborhood Councils. Staff attended Neighborhood Council and Community Assembly meetings to give presentations upon request.

4.4 Comment and Responses Matrix

Marked comment letters are included in **Chapter 6 Appendix G**. In the matrix below, comments are summarized and responses are provided for each comment. Comments that state preferences on alternatives or other matters such as policies are acknowledged with a response that the comment is noted and forwarded to City decision-makers. Comments that address methods, analysis results, mitigation, or other matters are provided a response.

The remaining sections are organized to group comments as follows:

- Tribes and Agencies
- Community Assembly and Neighborhood Councils
- Organization
- Individuals

Tribes and Agencies

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
			Tribe			
1	A	2/18/2026	Coeur d'Alene Tribe	Chief Allan, Chairman	Request that the EIS provide recognition of historical/current presence of the Coeur d'Alene Tribe and acknowledgement of their historical/cultural coexistence with land, water, and resources. The Coeur d'Alene Tribe is prepared to collaborate further on accurate representation.	The Final EIS adds more reference to the Coeur d'Alene Tribe in **Chapter 3, Section 3.4 Land Use Patterns and Urban Form**. In addition, the City is adding Draft text on indigenous peoples and a map of indigenous territories including the Coeur d'Alene Tribe both in the Final EIS and in the Draft Plan. The City consults with the Coeur d'Alene Tribe on City or Tribal projects. The City has invited participation of several Tribes and Urban Native Organizations in the PlanSpokane 2026 effort through the EIS scoping and comment process and development of the Climate Element. This includes Draft goals and policies on Tribal and Urban Native Collaboration (Goal LG-8 and policies) in the "Local Governance Through Civic Participation" in the Draft Comprehensive Plan. The City intends to collaborate further with the Coeur d'Alene Tribe.
			Agency			
2	A	1/6/2026	Department of Natural Resources	Sears, Tricia	Appreciation of summary in Draft EIS. General support of critical area protection by updating regulations to reflect best available science.	None of the alternatives analyzed would be in conflict with best available science. Furthermore, Alternatives 2 and 3 and the Preferred Alternative would incorporate updates to bolster existing critical areas regulations based on best available science (see **Section 3.3.3**, "Mitigation Measures").

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
2	B	1/6/2026	Department of Natural Resources	Sears, Tricia	Interest in numbers associated with critical areas impacted by the three alternatives. Also interested in additional information: critical area locations in Spokane and maps.	Mapped geologic hazards are included in **Section 3.1 Earth, Water Quality, and Water Resources**. The City protects critical areas per the GMA requirements in its critical area regulations; critical areas would not be committed to development under any of the alternatives. As noted in EIS **Section 3.3.3**, existing federal, state, and local regulations would sufficiently minimize habitat impacts from all alternatives. Incorporated plan features for Alternatives 2 and 3, and the Preferred Alternative, as listed in **Section 3.3.3**, would further minimize and mitigate habitat impacts. Additionally, the City has the responsibility to maintain its critical areas ordinances in accordance with best available science and will be updating them per GMA, which is assumed with action alternatives including the Preferred Alternative.
2	C	1/6/2026	Department of Natural Resources	Sears, Tricia	Support for Draft Natural Environment Chapter description and Policy NE 1.5 and Goals NE-6, NE-7, and NE-9.	Comment noted. Comments on policies are outside of the scope of the environmental analysis. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
3	A	2/17/2026	Department of Ecology	Hiebert, Amanda	Impacts to Vernal Pools in the West Plains UGA should be considered and mitigated. Includes specific critical area and code regulation info.	Vernal pools are specifically protected under Spokane City Code Chapter 17E.070, Wetlands Protection, and none of the alternatives would specifically subject vernal pools to development impacts. As noted in **Section 3.3.3** of the Draft EIS, existing federal, state, and local regulations would sufficiently minimize habitat impacts from all alternatives. Incorporated plan features for Alternatives 2 and 3 and the Preferred Alternative, as listed in **Section 3.3.3** of the Draft EIS, would further minimize and mitigate habitat impacts.
4	A	2/18/2026	Spokane County	Chesney, Scott R.	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%.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.	Shares of housing (net and gross) are shown in **Chapter 2, Exhibit 2.2 6**. Action alternatives allow more housing along corridors and hubs. Alternative 3 places the greatest intensity downtown. The Preferred Alternative blends Alternatives 2 and 3 and continues to distribute growth downtown. Though more new multi-unit housing is expected most of the city's housing would continue to be single unit.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
4	B	2/18/2026	Spokane County	Chesney, Scott R.	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.	Suggestions for future planning are outside of the scope of the environmental analysis. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
4	C	2/18/2026	Spokane County	Chesney, Scott R.	Transportation capacity, utility capacity, and public policy alignment with the neighborhoods and the market, are areas of interest to determine the city's ability to accommodate its projection goals.	Comment noted. See **Section 4.3** Theme response: "Transit and infrastructure" and responses to comments 4-D to 4-I.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
4	D	2/18/2026	Spokane County	Chesney, Scott R.	Interest in transportation capital facilities estimates to determine sustainable implementation.	The EIS focuses on potential impacts of alternatives. Assumed improvements are listed in **Chapter 6 Appendix C** Transportation Project Implementation Table. The City has posted its Draft Chapters and Appendices of the Plan: https://my.spokanecity.org/planspokane/chapter-review/. The Draft Transportation Element addresses goals and policies and Appendix 3 contains the 20-year Transportation Facilities Plan including planned multimodal improvements and a funding strategy. In addition, the City regularly prepares a six-year Comprehensive Street Program 2025-2030 and has updated traffic impact fees as one local source of funding, and capacity projects. Transportation impact fees are being updated in 2026. See: https://my.spokanecity.org/business/commercial/impact-fees/. Other capital improvements are addressed in the City's capital facilities plan, which is being updated in the periodic update. See Draft Plan Appendix 4.
4	E	2/18/2026	Spokane County	Chesney, Scott R.	Interest in more analysis on fire department turnout /response times.	Final EIS **Section 3.8** includes additional discussion on response times.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
4	F	2/18/2026	Spokane County	Chesney, Scott R.	Draft EIS does not address how a parks 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.	The EIS **Exhibit 3.8-18** includes an analysis of park acreage needed based on growth. The Area Specific Evaluation (Draft EIS pages 3-316 through 3-318) also includes narrative on what areas would be most affected. The descriptions of impacts by alternative also includes analysis on areas with the most need (Draft EIS page 3-318 through page 3-322). The Final EIS includes similar analysis for the Preferred Alternative in **Chapter 3, Section 3.8**, and updates to the levels of service in alignment with the draft Capital Facilities Plan that is part of the periodic update.
4	G	2/18/2026	Spokane County	Chesney, Scott R.	Concern that growth may/may not be in areas that can accommodate increased water services.	The pressure zones and TAZ polygons overlap in awkward ways which is why descriptions are included correlating specific pressure zones to TAZ polygon areas. The City plans in accordance with the Spokane Regional Transportation Council (SRTC) projections and the Water System Plan used projections available at the time of adoption (2022-2023). New projections go to a further horizon year (2050 instead of 2040, with EIS adjusting 2050 to 2046 per GMA targets). Variations in the growth between the 2019-2040 and 2022-2044 TAZ projections is discussed in the alternatives analysis in **Section 3.9.2**; and any changes will need to be addressed in the City's next Water System Plan which is outside of the scope of this EIS. See the EIS mitigation measures in **Section 3.9.3** which include review of system adequacy with each development, and the regular Water System Plan and Capital Facility Plan updates as required by the state.

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4	H	2/18/2026	Spokane County	Chesney, Scott R.	The Draft EIS does not identify current wastewater usage, nor does it project whether future growth can be accommodated in the facility. Further, physical expansion of the current site seems challenging	The City's latest published sewer projection data is from 2014 (Integrated Clean Water Plan). See the EIS mitigation measures which include review of system adequacy with each development, and Capital Facility Plan updates as required by the state. The City's Capital Facility Plan identifies capacity and agreements with the County and Air Force: RPWRF has the capacity during dry weather to continually treat 50 million gallons per day (MGD) of regionally generated sanitary sewage. Via Interlocal Agreement, the City has allocated 10 MGD of treatment capacity to Spokane County and about one (1) MGD to Fairchild Air Force Base. The City uses its Six-Year Capital Improvement Program and Comprehensive Plan Capital Facilities Plan to maintain levels of service which is 100 gallons per capita per day as an average. See the Draft Capital Facilities Plan (August 2026) at: https://my.spokanecity.org/planspokane/chapter-review/, see Appendix 4: PlanSpokane 2046 Capital Facilities Plan.

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4	I	2/18/2026	Spokane County	Chesney, Scott R.	Stormwater is identified with several areas of concern, some of which overlap with planned infill development areas. The Draft EIS does not discuss the impact of increased impervious surface or the overburdening of the CSO system as a result.	**Exhibit 3.9-15**. maps drainage concern areas. SMC Section 17D.060.135 allows the City to require an engineer's drainage plan in these areas. SMC 17D.060 addresses a wide range of requirements for stormwater facilities. New developments within the City of Spokane are required to follow current codes and design requirements, which means that any new development will need to dispose of stormwater onsite or to limit outflows to predeveloped rates. Impervious surface increases are discussed generally in the alternatives analysis in **Section 3.9.2**. The City also provides annual reports on its CSO system. See Wastewater Combined Sewer Overflow (CSO) - City of Spokane, Washington.
4	J	2/18/2026	Spokane County	Chesney, Scott R.	Spokane County Planning will need to better understand the data suggested by the narrative to support the growth projects of this Draft EIS and presume that a preferred alternative will be supported by empirical data for the city's final EIS.	Empirical data was sourced from other planning documents. Updating other reference documents is outside of the scope of this EIS; however, the preferred alternative was selected based on the Draft EIS evaluation and a public hearing process with the Plan Commission and City Council. The Final EIS responds to comments and provides best available data. The City is also preparing its Comprehensive Plan Elements and updated Capital Facility Plan. See the Draft at: https://my.spokanecity.org/planspokane/chapter-review/, Appendix 4: PlanSpokane 2046 Capital Facilities Plan.
5	A	2/18/2026	Spokane Transit Authority	Jennings, Brian	STA supports a preferred alternative aimed at sustainable growth with a focus on improving mobility.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity. It includes the SRTC employment projections also assumed under Alternative 1.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
5	B	2/18/2026	Spokane Transit Authority	Jennings, Brian	Growing jobs and households in neighborhood centers, especially downtown, is complemented and enabled by providing a variety of mobility/ transportation options.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and continues to concentrate growth in the urban core and areas with frequent transit. Several corridors improve connections between major hubs. The Final EIS details the incorporated plan features and other mitigation measures relating to transportation options in **Section 3.7.3**.
5	C	2/18/2026	Spokane Transit Authority	Jennings, Brian	Residents who walk, bike, or roll will benefit from a growth alternative that focuses on increasing residential development and economic growth along high-frequency/high-performance transit lines identified in Connect Spokane.	Comment noted. See **Section 4.3** Theme response: "Transit and infrastructure."
5	D	2/18/2026	Spokane Transit Authority	Jennings, Brian	Connect 2035 will support additional growth in the Division and Wellesley corridors. STA investments in transit will work well in advancing the goals of either alternative 2, alternative 3, and especially a hybrid of both.	Comment noted. See Response to Comment 5-A. **Section 4.3** Theme response: "Transit and infrastructure."

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
6	A	2/12/2026	Spokane Regional Transportation Council (SRTC)	Stewart, Ryan	Request for sources behind the Alternative 3 employment growth projections.	There are no regional job target allocations. As described in **Chapter 2, Section 2.2.3**, all alternatives assume greater jobs than the 20-year trend, which would add nearly 21,000 jobs between 2022-2046. Alternative 1 studies the SRTC projections which would add almost 35,000 jobs, about 14,000 more jobs than the 20-year trend. Alternatives 2 and 3 bookend the Alternative 1 assumptions. Alternative 2 studies growth like State Employment Security Department (ESD) projections adding almost 25,000 jobs. Alternative 3 studies a moderately higher projection above Alternative 1 of nearly 39,000 jobs. Alternative 3 considers a growth rate above the SRTC Projection of 1.15%. This is considered a moderate-high projection and was prepared by BERK as an upper bookend for the EIS. It was lower than a “high” projection based on the employment growth rate of 1.2% generated from projections provided by Spokane Workforce Council and developed by Lightcast, a private provider of data. The City provided the information to the SRTC in September 2025 and had a meeting to discuss them. The Preferred Alternative matches Alternative 1 consistent with SRTC projections.
6	B	2/12/2026	Spokane Regional Transportation Council	Stewart, Ryan	Request for clarification on why the Draft EIS "no significant impacts to state facilities, etc. " are expected when impacts are discussed elsewhere in the document.	The purpose of this programmatic EIS is to disclose how potential land use changes proposed as part of the action alternatives may affect the transportation system relative to what would occur with currently adopted designations and policies (the No Action alternative). Accordingly, the impacts of each Action alternative are assessed against the performance of No Action.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
						Related to vehicle network performance, a significant impact is identified under an Action Alternative if an intersection (city or state facility) degrades from an acceptable LOS in the No Action scenario; if the intersection already exceeds LOS thresholds in the No Action scenario, then an impact is identified if delay increases by 5 or more seconds. For state route segments, a significant impact is identified if the segment v/c increases by ≥0.05 at a location already at or above 1.00 under the No Action alternative. The Final EIS clarifies that while Action Alternatives may exceed the LOS standards at a study location, that is not considered a significant impact of the Action Alternatives unless it exceeds the relevant threshold of significance. Summary tables also distinguish that impacts to state routes are based on segment analysis.
6	C	2/12/2026	Spokane Regional Transportation Council	Stewart, Ryan	Draft EIS Exhibit 1.4-6 shows Alternative 2 with the least growth, which is in line VMT reduction framework.	Comment noted. Alternative 2 has the lowest employment growth as it relied on a lower job protection. However, to be consistent with the SRTC model, the Preferred Alternative assumes employment growth in line with Alternative 1. The Preferred Alternative combines elements of Alternatives 2 and 3, particularly related to housing and mixed uses, and directs a greater share of future housing and employment growth to Downtown, Centers, Corridors, and other areas with existing or planned transportation facilities, utilities, services, and transit access. This approach supports a more efficient use of public infrastructure, helps reduce vehicle miles traveled, and increases opportunities for walking, rolling, bicycling, and transit use.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
6	D	2/12/2026	Spokane Regional Transportation Council	Stewart, Ryan	Support for Alternative 2 & 3 solutions and mitigations for impacts to LOS as they are consistent with Horizon 2050 Guiding Principles and Policies.	See Response to Comment 6-C.
6	E	2/12/2026	Spokane Regional Transportation Council	Stewart, Ryan	SRTC uses Regional Mobility Corridor (not Intersection LOS) as a measure for analysis, see SRTC Comprehensive Plan Certification Checklist (attachment A, beginning on page 2).	The SRTC checklist information indicates the Regional Mobility Corridors/ State-Owned Transportation Facilities LOS is set by SRTC with WSDOT and local governments. In addition, the STRC regional mobility corridor LOS is for regional analysis purposes and cities may set a different LOS for concurrency purposes. The City's LOS policies and evaluation assumptions are identified EIS **Section 3.7**; the City coordinated with WSDOT on the evaluation of state corridors. See **Chapter 6 Appendix F** for coordination efforts.
6	F	2/12/2026	Spokane Regional Transportation Council	Stewart, Ryan	SRTC does not use V/C ratios as a performance metric unless part of a subarea or corridor-level study.	Comment noted. The V/C analysis methodology was established in coordination with WSDOT for state facilities.
6	G	2/12/2026	Spokane Regional Transportation Council	Stewart, Ryan	Request updated reference to Horizon 2050.	Comment noted. The Final EIS references the most recently adopted plan.

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6	H	2/12/2026	Spokane Regional Transportation Council	Stewart, Ryan	Does not reference impact to adjacent jurisdictions as required by RCW. Ongoing discussion with City and other jurisdictions.	As the commenter describes, the referenced RCW mentions the following as a requirement of transportation elements: (v) Intergovernmental coordination efforts, including an assessment of the impacts of the transportation plan and land use assumptions on the transportation systems of adjacent jurisdictions. The Transportation Element and EIS assess the operational performance of intersections and corridors located near city limits to understand potential needs for future coordination. The EIS analysis adapted a regional model from SRTC. The modeling is based on SRTC which comes from Horizon 2050 and an interjurisdictional process including WSDOT, City, County, STA, and others.
6	I	2/12/2026	SRTC	Stewart, Ryan	Request clarified language to accurately reflect impacts under Alternatives 2 & 3	See Response to Comment 6-B.
6	J	2/12/2026	Spokane Regional Transportation Council	Stewart, Ryan	Support for SEPA Exemption approach, and request to include SRTC in regional coordination for transportation impact analysis.	Comment noted. A code proposal for SEPA exemptions has not been developed at this time. See EIS **Chapter 6, Appendix E** for existing transportation concurrency and impact fee programs and potential phasing of the SEPA infill exemption. The City will consider SRTC in future regional coordination.
6	K	2/12/2026	Spokane Regional Transportation Council	Stewart, Ryan	All projects are consistent with Horizon 2050 and recent regional study efforts.	Comment noted.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
7	A	3/5/2026	Washington State Department of Transportation (WSDOT)	Clarke, Corey	Concern that employment growth does not align with the TAZ information provided. Alternative 2 & 3 model little employment growth compared to Alternative 1. Particular concern around the West Plains.	For the transportation analysis zones that were identified as West Plains there would be between 6,200 and 6,800 new jobs in the studied alternatives compared with existing jobs. Currently jobs in West Plains as of 2022 make up about 5% of citywide jobs and under the alternatives it would make up 8.9 to 9.4%. Under all alternatives it would be a job hub. Alternative 1 and the Preferred Alternative would add 6,200 net new jobs resulting in a share of 8.9%. The transportation results did not markedly change among the alternatives. Alternative 1 and the Preferred Alternative match the SRTC model (with adaptation for the appropriate 20-year period) and provide for regional transportation planning consistency.
7	B	3/5/2026	WSDOT	Clarke, Corey	Concern that centroid connectors are not loading roadway network in alignment with existing/proposed development in all 3 Alternatives. Several connectors affected by Thorpe.	Zones 1842, 1850, 1861 – while there could be more connectors for these zones, it would not have a material impact on forecasted volumes at nearby study locations. The Final EIS adds connectors for the Preferred Alternative evaluation and the results are not markedly different.

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7	C	3/5/2026	WSDOT	Clarke, Corey	Concern that centroid connectors are not loading roadway network in alignment with existing/proposed development in all 3 Alternatives. Connectors to Geiger Blvd. and Electric Ave. described.	Zone 5512 – the zone connectors could be adjusted for future studies, but it would not have a material impact on forecasted volumes at nearby study locations. The Final EIS adds connectors for the Preferred Alternative evaluation and the results are not markedly different.
7	D	3/5/2026	WSDOT	Clarke, Corey	Concern that centroid connectors are not loading roadway network in alignment with existing/proposed development in all 3 Alternatives. Connectors to 21st Ave. described.	Zone 5501 – The analysis in the Final EIS adjusts the forecasts at US 2 and Flint Rd to assign more demand to 21st Avenue.
7	E	3/5/2026	WSDOT	Clarke, Corey	Concern that centroid connectors are not loading roadway network in alignment with existing/proposed development in all 3 Alternatives. Connectors to Valley Springs described.	Zone 5271 – the zone connectors could be adjusted for future studies, but it would not have a material impact on forecasted volumes at nearby study locations. The Final EIS adds connectors for the Preferred Alternative evaluation and the results are not markedly different.

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7	F	3/5/2026	WSDOT	Clarke, Corey	Concern that centroid connectors are not loading roadway network in alignment with existing/proposed development in all 3 Alternatives. Connectors to SR-291 described.	Zones 290 and 340 –. There is land use growth assumed in zone 290 but the model loading more trips onto SR 291 would have a limited impact on LOS results since SR 291 is well under capacity and volume would likely remain the same at other nearby study locations. The Final EIS adds connectors for the Preferred Alternative evaluation and the results are not markedly different. The City has area-specific studies and impact fee programs addressing Francis, Assembly, and Driscoll.
8	A	2/18/2026	WSDOT	Figg, Greg	Modeling along Division/US-2 does not appear to account for planned BRT, this may cause traffic to shift to other regional routes.	The comment is noted. The approach to address planned BRT in the EIS is consistent with the SRTC regional model, using information available at the time of analysis.
8	B	2/18/2026	WSDOT	Figg, Greg	Land use growth/trip generation of the 3 alternatives, west of US-195 and south of I-90, are not able to be confirmed based on limited information provided. Key analysis missing.	Land use was provided in January 2026 to WSDOT and model-based data subsequently upon request. It is part of Final EIS **Chapter 6 Appendices B and C**. Study locations along US 195 were selected by the City in the context of the US 195 study and planned improvements.
8	C	2/18/2026	WSDOT	Figg, Greg	Modeling in the West Plains does not reflect the land uses proposed in the Draft EIS.	See Response to Comment 7A.

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8	D	2/18/2026	WSDOT	Figg, Greg	Modeling along SR-291 does not appear to include all planned growth as shown in the proposed land uses.	See Response to Comment 7F.
8	E	2/18/2026	WSDOT	Figg, Greg	Modeling along US-395, near Wellesley Ave. does not appear to incorporate planned growth as shown in the land use proposals.	The planned growth along Division reflects transit oriented development and the action alternatives including the Preferred Alternative promote more housing and mixed use growth in the corridor than the No Action Alternative. See **Chapter 6 Appendix B**.
8	F	2/18/2026	WSDOT	Figg, Greg	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.	This requested information was provided on January 9, 2026 and is added to the Final EIS **Chapter 6 Appendix C**.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
8	G	2/18/2026	WSDOT	Figg, Greg	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.	A code proposal for SEPA exemptions has not been developed at this time. The Draft EIS Appendix Chapter 5 describes the City's transportation concurrency and impact fee programs and potential phasing of the SEPA infill exemption. The Final EIS includes a similar appendix, **Chapter 6, Appendix E**.
8	H	2/18/2026	WSDOT	Figg, Greg	In our requests for additional information some documents received are dated after the issuance of the Draft EIS. Was this information considered as part of the Draft EIS analysis?	The land use information shared in January 2026 in tabular form matches the TAZ maps / data in the Draft EIS appendix. It is included in the Final EIS and incorporates the Preferred Alternative. See **Chapter 6, Appendix B**. The transportation analysis shared in January 2026 is largely an excerpt of items included in the Draft EIS. The detailed Synchro reports reflect the analysis in the Draft EIS and is added as an appendix in the Final EIS; see **Chapter 6, Appendix C**.
8	I	2/18/2026	WSDOT	Figg, Greg	Address intergovernmental coordination with WSDOT and other jurisdictions.	See Response to Comment 6-H. In addition, see **Chapter 6, Appendix E** for WSDOT and other coordination efforts. The City's scoping and Draft EIS comment periods were also opportunities for coordination; see the EIS Distribution list which lists many agencies and jurisdictions.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
8	J	2/18/2026	WSDOT	Figg, Greg	The EIS does not demonstrate consistency with GMA requirements around level-of-service standards.	The EIS used the City's adopted LOS and the State's Adopted LOS too. GMA requires disclosure of effects on state facilities which is documented in the EIS **Section 3.7**. The EIS analysis adapted a regional model from SRTC. The modeling is based on SRTC which comes from Horizon 2050 and an interjurisdictional process which included WSDOT, City, County, STA, and others.
8	K	2/18/2026	WSDOT	Figg, Greg	Concern that the Draft EIS does not address impacts to state highway system where growth is expected. The City must consult with WSDOT and document those consultations, impacts, and mitigating measures to be compliant with State requirements (RCW). WSDOT requests a meeting.	In addition to scoping and Draft EIS comment periods and Plan Commission and City Council hearings, there have been several meetings and correspondence with WSDOT prior to and after Draft EIS publication. Individual meetings included: • June 3, 2025 • January 13, 2026 • February 23, 2026 • May 26, 2026 See **Chapter 6, Appendix F** for a summary of coordination efforts.
8	L	2/18/2026	WSDOT	Figg, Greg	WSDOT requests an extension of the Draft EIS review period and raise concerns over public records request.	The Draft EIS Comment Period was extended to March 5, 2026. The City's public records request process follows City requirements.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
8	L	2/18/2026	WSDOT	Figg, Greg	Concern that the City did not have sufficient information to support Draft EIS conclusions, particularly around impacts to the state transportation system.	See prior responses to Letters 7 and 8.
			Internal City Agencies			
9	A	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Concern that the suggested mitigation strategies for protecting historic and cultural resources are not sufficient to address the impacts of the proposed alternatives. 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.	Comment noted. The City will consider SHPO input as future regulations are prepared.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
9	B	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Amend note under map of City of Spokane Neighborhoods (Exhibit 1.1-2) to add Manito/Cannon to the list of unlabeled neighborhoods.	Comment noted. The change is made in **Chapters 1** and **2** of the Final EIS.
9	C	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Exhibit 1.4-2 Summary of Impacts and Mitigation – Built Environment – Highest Level of Cultural and Historic Resources potential impact equates to high levels of mitigation.	Comment noted. All alternatives are subject to proposed mitigation measures in **Section 3.4** of the EIS. The City will determine the proposed policies and code amendments that support Cultural and Historic Resources mitigation.
9	D	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Edits to description of Cultural Resources Impacts to reference historic neighborhoods in addition to historic buildings.	Comment noted. Change is made in the Summary and in **Chapter 3.4** to refer to historic sites or districts.

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9	E	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Edits to example mitigation to note that Chapter 17D.100 addresses both nomination and regulation of historic landmarks or districts. Support for expanded development regulations and place-specific strategies including applying shoreline regulations citywide and developing a decision tree. Support for conclusion regarding significant impacts and approach of proactive identification of resources.	Comments are noted. Clarification that Chapter 17D.100 addresses both nomination and regulation has been added to the text in **Chapter 1** and **Section 3.4**. The City is considering potential code changes as part of BUILDSpokane.
9	F	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Support for proactive surveys in addition to developing pre-project cultural (and historic) resource review process.	Comment noted. Text in **Chapter 1** Summary and **Chapter 3 Section 3.4.3** is amended in the Final EIS to add the strategy of proactive surveys of historic and cultural resources.
9	G	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Demolition of homes and physical displacement needs more mitigation.	See **Exhibit 3.5-44**, Summary Matrix of Housing and Business Anti-Displacement Measures. See also the Draft Housing Element and Appendices which incorporates updated policies including addressing displacement.

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9	H	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Clarification of language about period and context on Building Types and Styles subsection (page 3-104).	Comment noted. Text in **Section 3.4** , Building Types and Styles subsection, is amended in the Final EIS.
9	I	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Exhibit 3.4-16 State Archaeological Risk Map - This map shows how the proposed decision tree would result in a lot of survey required depending on the threshold to initiate the tree.	Comment noted. City planners will coordinate with the Spokane Historic Preservation Office on potential code changes related to the cultural and historic resources review and potential decision tree.
9	J	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Historic Districts table and maps in Section 3.4 – clarify number of historic properties and address new Canon Hill Park Local Historic District, approved after publication of Draft EIS in late December 2025./	Text, table, and maps are updated to add the new Cannon Hill Park District in **Exhibit 3.4-18 and Exhibit 3.4-19** in the Final EIS. Text clarifications about the over 1000 properties in historic districts is also added.
9	K	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Cultural Resources discussion under Impacts Common to All, page 3-123, clarify areas around the Spokane River. Clarify “adversely” affect.	Comment noted. Text in **Section 3.4** , Impacts Common to All Alternatives, Cultural Resources is amended in the Final EIS.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
9	L	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Question of the applicability of job growth under Alternative 3 to cultural resources on page 3-126.	Higher job growth corresponds with more development, which could have impacts to cultural resources through land disturbance and changes to or demolition of buildings. Please note that the Preferred Alternative assumes job growth more like Alternative 1, which is consistent with regional projections and is lower than Alternative 3. Clarifications are made to the description of impacts regarding Alternative 3 in the Final EIS.
9	M	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Concern about a non-mandatory process to catch archaeological resources. City's historic preservation code has incentives but not all incentives have been used.	Comments are noted. The potential SEPA infill exemption would not limit the City's potential to set up a mandatory cultural and historic resources review through its code. For that reason, the EIS mitigation measures recommend pre-project cultural resources review and decision tree and use of similar policies and code as the SMP citywide. The City can consider strengthening its incentives program and this is clarified in the Final EIS in **Section 3.4.3**.
9	N	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Suggest a city-wide historic preservation plan as part of advanced planning in mitigation measures. What also will be thresholds for the decision tree?	Comments are noted. Reference to a citywide historic preservation plan is added to the mitigation measures **Section 3.4.3** in the Final EIS. See also Response 9-I regarding the potential mitigation involving a decision tree to pre-project review.
9	O	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Support for Low-Cost Rental Housing Preservation in Exhibit 3.5 44. What are preservation credits?	Comments are noted. Language is clarified in the Final EIS to refer to tax credits.

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9	P	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Section 3.6, Discussion in relation to GMA goal on historic preservation – should add "adversely" to "affect."	Comment noted. **Exhibit 3.6–5** is amended in the Final EIS to add "adversely."
9	Q	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Appendix on Infill and SEPA Exemptions, explanation of flexible SEPA threshold requirements: wish this included language about increased survey work so we can be proactive not reactive in identification of resources.	The language regarding the process to set flexible SEPA thresholds is based on language in WAC 197-11-800. The Final EIS continues to recommend advanced planning which could involve citywide survey work by the Spokane Historic Preservation Office.
9	Q	1/30/2026	Spokane Historic Preservation Office	Camporeale, Logan	Appendix on Infill and SEPA Exemptions, add mitigation due to Chapter 15.06 Preservation of Salvageable Materials.	Comment noted. The code section is added to EIS **Chapter 6, Appendix E**.
10	A	2/18/2026	Spokane ICM	Picanco, Kevin	Requests an extension of the Draft EIS review period.	This request was accepted. The Draft EIS Comment Period was extended to March 5, 2026.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
11	A	3/5/2026	Spokane ICM	Picanco, Kevin	ICM is supportive of the Phase 1 Infill Exemptions Area moving forward but has concerns with the proposal for Phase 2. Believes concerns will be addressed through code development and would like to be involved in that process.	The comment is noted. When the proposals are developed into ordinances an interdepartmental process including ICM would be conducted.
11	B	3/5/2026	Spokane ICM	Picanco, Kevin	If there is desire to streamline development within the Phase 2 area ICM staff would be supportive of limitations pertaining to set housing unit numbers, set square footage for non-residential development, no exemption for commercial development that have high water and sewer demand, no exemption of significant amenities, set parking numbers, and set grading numbers.	The comment is noted. **Chapter 6, Appendix E** in this Final EIS identifies that the City may adjust SEPA flexible thresholds citywide (Phase 1 and Phase 2) and focus the infill exemption for residential and mixed uses first in Phase 1. The flexible thresholds citywide could address specifics for non-residential development including based on size and water/sewer demand, parking numbers, and grading numbers.

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11	C	3/5/2026	Spokane ICM	Picanco, Kevin	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.	The comment is noted. Adjustments could be made to the Phase 2 area, adding some locations to Phase 1, based on input of ICM on appropriate locations with existing or planned utilities.
11	D	3/5/2026	Spokane ICM	Picanco, Kevin	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.	The comment is noted. When the proposals are developed into ordinances an interdepartmental process including ICM would be conducted. When the capacity analysis in Phase 2 is available for some or all of that area, it could be added to the infill exemption area.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
11	E	3/5/2026	Spokane ICM	Picanco, Kevin	Phase 2 SEPA exemption should include code modifications requiring developers to include 1) offsite sidewalk, roadway, transit access, schools, bus stops, parks, and commercial sites. 2) offsite crosswalk enhancement. 3) traffic signals. 4) other traffic safety improvements, including traffic calming, sight distance mitigations, curb installation, and relocation/consolidation of driveways.	The comment is noted. The City is working on BUILDSpokane to improve its code. That process or others are opportunities to bolster the City's ability to condition development in areas whether there is greater need for infrastructure improvements.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
11	F	3/5/2026	Spokane ICM	Picanco, Kevin	Prior to adopting infill exemptions in the phase 2 area, the City should: 1) use the SRTC Model to analyze the proposed use/density, identify transportation and wet utility mitigation(s) to address environmental impact. 2) Adopt long term transportation and utility funding sources (includes examples). 3) Update City's design standards and SMC for all wet utilities. 4) Develop a funding plan for projects parallel to US 2 and US 195. 5) Develop a funding plan to upsize major wet utilities (includes examples).	The comment is noted. The preliminary Phase 2 area was meant to identify some steps towards capital planning and funding such as for transportation and utilities.
11	G	3/5/2026	Spokane ICM	Picanco, Kevin	Phase 2 SEPA exemption should consider 1) Availability of transit service within 1/2 mile. 2) Construction alternatives and parallel routes to state highways.	The comment is noted. The Phase 1 area is based on ½ mile of current transit service. The preliminary Phase 2 area was meant to identify some steps towards capital planning and funding such as for transportation and utilities.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Responses
11	H	3/5/2026	Spokane ICM	Picanco, Kevin	Phase 2 SEPA exemption should identify locations within special stormwater or drainage districts or areas of challenging treatment and drainage options.	The comment is noted. The City has a code for Areas of Drainage Concern; if code improvements are appropriate they could be made. See Response to Comment 11-E.
11	I	3/5/2026	Spokane ICM	Picanco, Kevin	Phase 2 SEPA exemption should identify 1) locations that will contribute to regional lift station(s). 2) goals, status, and progress objectives of the Septic Elimination Program.	The comment is noted. The City can identify local improvement districts or latecomer's agreements to define areas that need to contribute to system improvements not addressed by utility fees. The City's code related to when sewer hookup is required could be updated. See Response to Comment 11-E.
11	J	3/5/2026	Spokane ICM	Picanco, Kevin	Phase 2 SEPA exemption should consider 1) Additional infrastructure demands created by water contamination. 2) Capacity challenges related to future intertie agreements.	The comment is noted. The preliminary Phase 2 area was meant to identify some steps towards capital planning and funding such as for transportation and utilities.

Community Assembly and Neighborhood Councils

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
12	A	2/24/2026	Community Assembly	Tolley, Luke	Concern that the EIS does not meaningfully incorporate neighborhood councils or community assembly in decision-making framework. EIS references outdated or nonexistent neighborhood action plans.	See **Section 4.3** Theme response: "Neighborhood councils." References to neighborhood plans in **Section 3.6** include dates of adoption. Some plans have not recently been updated but these are still adopted plans. Details of other planning efforts that were not adopted are still included for context.
12	B	2/24/2026	Community Assembly	Tolley, Luke	Request a clear explanation of the mechanism by which these alternatives may be modified, combined, or refined into a single, consensus-based final plan.	Comment noted. Generally, in the EIS process, the Preferred Alternative can be one of the studied alternatives from the Draft EIS or a blend of multiple alternatives. The Preferred Alternative must be within the range of what was studied in the Draft EIS and not introduce new concepts. The Preferred Alternative is a combination of various features of the studied alternatives, based on public input and the Draft EIS evaluation. The Plan Commission recommended approval of the draft Preferred Alternative in April 2026 and the City Council approved the draft Preferred Alternative with minor amendments in May 2026 (see RES 2026-0035).
12	C	2/24/2026	Community Assembly	Tolley, Luke	Concern over lack of concrete mechanisms to ensure that new development will meaningfully address the 0–80% AMI housing shortage,	The comment is noted and forwarded to City decision-makers. Through HB 1220 the GMA requires the City to provide adequate capacity for housing at all income levels. The City has followed Department of Commerce guidance in developing its evaluation of housing capacity and other requirements to identify barriers and make adequate provisions to remove barriers. A summary of the City's analysis is included in **Section 3.5** of the EIS. Additionally, the

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
					rather than generalized growth assumptions.	City will make progress reports per RCW 36.70a.130(9) to track housing units and progress in implementing its housing policies and strategies and can adaptively manage its housing policies, codes, and strategies. This monitoring requirement is added to the list of mitigation measures in **Section 3.5**.
12	D	2/24/2026	Community Assembly	Tolley, Luke	Concern about demolition of current housing stock and lack of discussion and proof that the marketplace and new policies and codes would address affordability effectively.	The action alternatives including the Preferred Alternative include the adoption of a new Housing Element that includes measures to increase the supply of housing and reduce the potential for displacement. In the last five years the City developed new approaches for middle housing and has successfully implemented incentives for higher density, adaptive reuse, and affordable housing in Downtown. With the periodic update the City has considered policies and changes to future land use and zoning to create more opportunity for all types of housing, particularly housing affordable to 0–80% AMI, like low and mid-rise housing. A planning-level evaluation of supply and displacement is included in the EIS **Section 3.5.2**. Also, see **Exhibit 3.5-44** summarizing a matrix of anti-displacement measures. The City's Draft Housing Element and Technical Appendix are available for review here: https://my.spokanecity.org/planspokane/chapter-review/.
12	E	2/24/2026	Community Assembly	Tolley, Luke	Concern over environmental exemption impacts, particularly with how many areas are designated as corridors.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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12	F	2/24/2026	Community Assembly	Tolley, Luke	Concern that the City is not doing enough to reduce vehicle-related emissions considering population increases are anticipated without corresponding increased transit use.	Please see **Section 4.3** Theme 7 on Transit and Infrastructure and Theme 10 regarding VMT and emissions.
12	G	2/24/2026	Community Assembly	Tolley, Luke	The "Earth, Water Quality, and Water Resources" section omits reference to the region's aquifer system. Why? How will the plan address attempts to reduce/eliminate federal environmental considerations, incentives, and regulations?	Please see **Section 4.3** Theme 9: Water.
12	H	2/24/2026	Community Assembly	Tolley, Luke	The basis for planning should be current conditions. Goals should include: 1) minimizing displacement, 2) strengthening homeownership opportunities, 3) protecting neighborhood character, 4) preserving trees and environmental integrity, 5)	The EIS describes baseline conditions in the affected environment for each topic in **Chapter 3**. Please also see responses to comments 12-D and **Section 4.3** Themes 1 and 5 regarding tree canopy and habitat and affordable housing.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
					directing growth toward demonstrable affordability needs.	
12	I	2/24/2026	Community Assembly	Tolley, Luke	Recommend incorporating the best elements of Alternative 2 & 3. As currently presented, Alternatives 2 and 3— combined with expansive infill exemptions— risk negative impacts.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity. See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review." about the infill exemption.
12	J	2/25/2026	Community Assembly	Tolley, Luke	What is the role of neighborhood councils or community assembly in decision-making framework?	See **Section 4.3** Theme response: "Neighborhood councils."
12	K	2/26/2026	Community Assembly	Tolley, Luke	If current mechanisms are inadequate for ensuring that the Preferred Alternative is followed by housing developers, what provisions will the city make for enacting its tenets? Believes councilmember Klitzke's taxation of vacant properties addresses the issue.	The comment on policies and strategies is noted and forwarded to City decision-makers. The City will monitor the Housing Element consistent with RCW 36.70A.130(9) and adaptively manage adopted policies.
12	L	2/27/2026	Community Assembly	Tolley, Luke	Concern over loss of existing housing stock due to redevelopment. Concern	A summary of displacement impacts is found in **Chapter 1**, and available in detail in **Section 3.5**.

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					that demolished housing units is not addressed early enough in EIS.	
12	M	2/28/2026	Community Assembly	Tolley, Luke	The projected impact to neighborhoods of the contemplated exemptions is extensive.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
12	N	3/1/2026	Community Assembly	Tolley, Luke	Is the City doing enough to reduce the use of personal vehicles, which is the source of a large proportion of many pollutants?	The action alternatives including the Preferred Alternative focus more mixed use development in proximity to transit to support alternative modes. The City also has planned improved bicycle and pedestrian networks. Please also see **Section 4.3** Theme 7 and Theme 10 related to transit and VMT.
12	O	3/2/2026	Community Assembly	Tolley, Luke	Concern that more information on environment, impacts, and mitigation measures should be included in section 1 (summary) and section 2 (proposal and alternatives).	Comment noted. **Chapter 1** is intended to summarize findings. Full details of the analysis are shown in **Chapter 3**. The purpose of **Chapter 2** is to define the alternatives, not to assess impacts. This is a standard structure for an EIS. Aquifer conditions are addressed in **Chapter 3**, **Section 3.1 Earth, Water Quality, and Water Resources**.
12	P	3/3/2026	Community Assembly	Tolley, Luke	Concern that the Earth, Water Quality, and Water Resources section does not reference the Spokane Valley-Rathdrum Prairie Aquifer. Recommends growth policy explicitly address aquifer protection,	The summary addresses groundwater broadly and Chapter 3, **Section 3.1** addresses the aquifer more specifically. Please also see **Section 4.3** Theme 9 response: "Water."

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					stormwater management, and riparian health.	
12	Q	3/4/2026	Community Assembly	Tolley, Luke	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?	The analysis for each topic in the EIS identifies assumptions and mitigation measures referencing existing local, state, and federal regulations. The City has the opportunity to monitor and amend as needed its plans and regulations (e.g., natural environment and climate policies, critical areas regulations, landscaping, other) over time should there be changes to conditions and trends and a need to address gaps or impacts. It should also be noted that the State of Washington has its own set of laws to protect environmental quality such as clean air, clean water, endangered species, critical areas, climate commitment act, shoreline management, and others that provide legal framework and expectations for cities and counties.
12	R	3/5/2026	Community Assembly	Tolley, Luke	The narrative, much of which is written in general terms, would benefit from examples of the concrete details given in the exhibits.	The EIS is programmatic given the nature of the non-project action. (See WAC 197-11-442) The text and exhibits allow comparison of the impacts of growth across the city. Breakdown of information by study areas is meant to provide a review of effects in different areas of the city.
12	S	3/6/2026	Community Assembly	Tolley, Luke	What plans are there for making one or more combined Draft EIS Alternative models? Referencing citizen comment preference for combined	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity.

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					elements of Alternative 2 & 3.	
12	T	3/7/2026	Community Assembly	Tolley, Luke	What opportunities will there be over the twenty years of the alternative's duration for course correction of any problems that may develop?	The City will be required to prepare a progress report in five years and update in 10 years. Annually the City can make changes too through a docket process. Please see RCW 36.70a.130.
12	U	3/8/2026	Community Assembly	Tolley, Luke	Clarifying questions on several specific Draft EIS pages regarding household size and population range (2.16-17)	The current household size carried forward creates a conservative analysis of population. The current household size represents an average and the City has a mix of housing types and sizes shared in the referenced chart. The lower bookend assumes population consistent with regional allocations. The City expects to have capacity at a range of densities in the future both single unit, middle housing, and higher densities. Even with the addition of more attached units to meet housing targets at lower income levels, the City will still have a majority of units being single unit. See **Exhibit 2.2-6**.
12	V	3/9/2026	Community Assembly	Tolley, Luke	Concern that property owners might not want to construct attached multi-units or sell to someone who does.	Comment noted. The role of the City is to create a regulatory environment in which a variety of housing units are possible and to remove barriers to reach housing targets. Policy changes proposed with the Draft Comprehensive Plan aim to reduce these barriers. Property owners are not required to construct attached multi-units but proposed land use designations would give them that option. Text has been updated in the Final EIS for clarity.

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12	W	3/10/2026	Community Assembly	Tolley, Luke	Greater jobs will impact earth and water quality. Concern over negative impact on air quality and greenhouse gas emissions due to job increase. Concern that emission reductions from vehicles will not be achieved. Requests source information for assessing pollutant levels.	The commenter is highlighting information from earth and air quality sections regarding the observed and potential future increase in impacts due to growth including growth in jobs. Regarding p. 157 of the Draft EIS: The report cites three sources for assessing and visualizing pollutant levels and the links are added in the Final EIS and provided below: ▶ Spokane Climate Risk and Vulnerability Assessment: https://my.spokanecity.org/planspokane/climate-planning/. ▶ Spokane Climate Vulnerability Index Map: https://my.spokanecity.org/planspokane/climate-planning/. ▶ Washington Environmental Health Disparities Map: https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map. These documents are referenced in **Section 5.2** of the Final EIS (and were in Section 4.2 of the Draft EIS).
12	X	3/11/2026	Community Assembly	Tolley, Luke	Concern over cancelled federal funding for environmental projects.	Comment noted. The EIS results do not depend on funding availability or require fiscal or financing analysis. Evaluating changes in funding or the impacts of canceled funding is outside the scope of the analysis. (WAC 197-11-448(3)) Please also see Response to Comment 12-Q.
12	Y	3/12/2026	Community Assembly	Tolley, Luke	Concern over threats to habitat and water quality.	The plan-incorporated mitigation and other recommended mitigation measures identified in **Section 3.3.3** contain a number of measures to protect and safeguard terrestrial and riparian habitat, limit clearing and soil disturbance in critical

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						areas generally, and update protections within Fish and Wildlife Habitat Conservation Areas and Floodplain critical areas.
12	Z	3/13/2026	Community Assembly	Tolley, Luke	Alternatives 1 & 3 would have greater harmful effects on wildlife habitat than Alternative 2.	Please see **Section 3.3 Plants and Animals, subsection 3.3.2** Impacts Common to All Alternatives for potential impacts that are similar across alternatives. The EIS distinguishes the alternatives based on growth patterns in less developed areas (more so in Alternative 1) or more focused in already developed areas (Alternatives 2 and 3). Focusing new growth in more densely developed areas and along major transit and transportation corridors will help to minimize the loss of existing habitat connectivity as Spokane's population continues to grow. See also Response to Comment 51-H.
12	AA	3/14/2026	Community Assembly	Tolley, Luke	Is Corbin Park a local and national historic district, or only local - as listed in Draft EIS.	Corbin Park is listed on both the national and local historic registers, as indicated in the Final EIS (**Section 3.4.1**).
12	AB	3/15/2026	Community Assembly	Tolley, Luke	The list of areas especially affected by noise pollution omits Northwest Spokane, home of the Great Northwest Spokane Street Speedway.	**Exhibit 3.4-20 Existing Transportation-Related Noise** is based on the National Transportation Noise Map. The USDOT provides the following caveats: It is intended for the tracking of trends and should not be used to evaluate noise levels in individual locations and/or at specific times. Please visit this site for supporting documentation and data downloads (*https://maps.dot.gov/BTS/NationalTransportationNoiseMap/*). The text above **Exhibit 3.4-21** is amended in the Final EIS to refer to Northwest since some tracts on the map are highlighted there too.

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12	AC	3/15/2026	Community Assembly	Tolley, Luke	Summary of comments from outreach sessions. Preference for Alternative 2 or combining desirable parts of 2 and 3.	The comments are noted and forwarded to City decision-makers.
12	AD	3/16/2026	Community Assembly	Tolley, Luke	Concern over the environmental review exemption.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
13	A	2/17/2026	Grandview/ Thorpe Neighbor-hood Council	Grandview/ Thorpe Neighbor-hood Council	Concern that the EIS does not meaningfully incorporate neighborhood councils or community assembly in decision-making framework. EIS references outdated or nonexistent neighborhood action plans. Would like to know how neighborhood councils will be engaged in shaping, refining, and implementing final land use map or alternative.	See **Section 4.3** Theme response: "Neighborhood councils."
13	B	2/17/2026	Grandview/ Thorpe Neighbor-hood Council	Grandview/ Thorpe Neighbor-hood Council	Request a clear explanation of the mechanism by which these alternatives may be modified, combined, or refined into a single, consensus-based final plan.	Comment noted. Please see Response to Comment 12-B regarding the development of the Preferred Alternative.

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13	C	2/17/2026	Grandview/ Thorpe Neighbor-hood Council	Grandview/ Thorpe Neighbor-hood Council	Requests clarification on how land use policy demolition, permitting, and incentives, will offer concrete mechanisms to ensure that new development will meaningfully address the 0–80% AMI housing shortage, rather than generalized growth assumptions.	See **Section 4.3** Theme response: "Affordable housing"
13	D	2/17/2026	Grandview/ Thorpe Neighbor-hood Council	Grandview/ Thorpe Neighbor-hood Council	Urge the city to explicitly address demolition impacts, displacement risk, homeownership preservation in both analysis and policy documents.	Thel EIS includes analysis on housing variety and affordability, residential displacement, and demolition in **Section 3.5.2**. This section also includes analysis of how Housing Action Plan strategies are advanced under each alternative, including strategies under Housing Action Plan priority C: "Enhance equitable access to housing and homeownership." The Draft Comprehensive Plan includes several policies that address demolition, displacement, and homeownership: • GS-2.3, Displacement Risk • GS-3.1, Addressing Housing Displacement • H-1.5, Expanded Opportunity for Incentives and Funding • H-2.3, Homeownership • H-4.1, Affordability Requirements • H-4.2, Lower-Income Housing Supply • H-7.1, Tenant Displacement

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						• H-7.4, Displacement Monitoring See: https://my.spokanecity.org/planspokane/chapter-review/. Suggestions for future planning are outside of the scope of the environmental analysis. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
13	E	2/17/2026	Grandview/ Thorpe Neighbor-hood Council	Grandview/ Thorpe Neighbor-hood Council	Broad infill exemptions risk facilitating intensive, uncoordinated development within established single-family neighborhoods. The cumulative impact of these exemptions must be fully disclosed and carefully reconsidered.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
13	F	2/17/2026	Grandview/ Thorpe Neighbor-hood Council	Grandview/ Thorpe Neighbor-hood Council	If population increases are anticipated without corresponding transit gains, personal vehicle use will likely rise. Questions: 1) how will additional vehicle demand be accommodated? 2) where will parking occur in areas with reduced requirements? 3) What strategies are in place to	Questions #1 and #2 are addressed through **Section 4.3** themes "Transit and Infrastructure." Regarding question #3, policy TR-9.2, TR-9.3, and TR-9.4 of the August 2026 draft Comprehensive Plan support: evaluating Transportation Demand Management (TDM) strategies to gain efficiency in the transportation system and reduce Vehicle Miles Traveled (VMT), continuing the City's participation and investment in the countywide TDM program, and evaluating expansion of trip reduction requirements.

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					meaningfully reduce vehicle-related emissions?	
13	G	2/17/2026	Grandview/ Thorpe Neighbor-hood Council	Grandview/ Thorpe Neighbor-hood Council	The "Earth, Water Quality, and Water Resources" section omits reference to the region's aquifer system. This omission is concerning and warrants correction.	See Response to Comment 12-P.
13	H	2/17/2026	Grandview/ Thorpe Neighbor-hood Council	Grandview/ Thorpe Neighbor-hood Council	The basis for planning should be current conditions. Goals should include: 1) minimizing displacement, 2) strengthening homeownership opportunities, 3) protecting neighborhood character, 4) preserving trees and environmental integrity, 5) directing growth toward demonstrable affordability needs.	The EIS describes baseline conditions in the affected environment for each topic in **Chapter 3**. Please also see Responses to Comment 12-D and **Section 4.3** Themes 1 and 5 regarding tree canopy and habitat and affordable housing.
13	I	2/17/2026	Grandview/ Thorpe Neighbor-hood Council	Grandview/ Thorpe Neighbor-hood Council	Recommend incorporating the best elements of Alternative 2 & 3. As currently presented, Alternatives 2 and 3—combined with expansive	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity. See **Section 4.3** Theme responses: "Tree canopy and habitat / concern about environmental review" and "Affordable Housing." See the

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
					infill exemptions— risk negative impacts. The neighborhood would like to engage constructively in further shaping of the plan.	website for information on plan and code update review opportunities: https://my.spokanecity.org/planspokane/.
14	A	2/11/2026	North Indian Trail Neighbor-hood Council	Knechtel, Dan	North Indian Trail transportation infrastructure capacity concerns with high density growth potential in Alternatives 2 & 3.	See **Section 4.3** response to Theme "Transit and Infrastructure."
14	B	2/11/2026	North Indian Trail Neighbor-hood Council	Knechtel, Dan	Concern that middle and high schools in North Indian Trail don't have capacity for growth potential in Alternatives 2 & 3.	Comment noted. The Preferred Alternative assumes less growth in Northwest Spokane than Alternatives 1, 2, and 3, and focuses housing growth near transit and in areas with planned capacity. Growth in any one neighborhood would be expected to occur gradually over the 20-year period. School districts monitor growth trends and conduct their own capital facilities planning regularly to respond.
14	C	2/11/2026	North Indian Trail Neighbor-hood Council	Knechtel, Dan	Request for a joint development plan with Spokane County prior to development of the North Indian Trail area.	The comment is noted and forwarded to City decision-makers.
14	D	2/11/2026	North Indian Trail Neighbor-hood Council	Knechtel, Dan	Concern that North Indian Trail is not conducive to employment hub development.	Comment noted. All Alternatives, including Alternative 1, which is based on current land use designations, assume a similar number of jobs in Northwest Spokane including North Indian Trail. The Preferred Alternative does not emphasize employment in this area.

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14	E	2/11/2026	North Indian Trail Neighbor-hood Council	Knechtel, Dan	General recommendation that North Indian Trail be designated low density and low growth.	Comment noted. The Preferred Alternative assumes that existing land use designations for most of North Indian Trail will remain the same. Changes are focused on adding mixed uses and higher density residential land use designations around existing services, which are concentrated around W Barnes Rd and N Indian Trail Rd. Because of land use changes and added capacity in other parts of the City, the Preferred Alternative assumes less growth than the other alternatives and substantially less growth than Alternative 1, which is based on existing designations.

Organizations

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15	A	2/12/2026	350Spokane Interfaith Committee	Farness, Janet	Request that the Comp Plan process be paused until Alternative 2 & 3 concerns over tree and habitat loss are addressed.	Please see **Section 4.3**, Theme 1 "Tree canopy and habitat / concern about environmental review."

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16	A	3/5/2026	Downtown Spokane Partnership	Cameron, Emilie	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.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and continues to concentrate growth in the urban core and areas with frequent transit. The Preferred Alternative encourages infill housing development such as through SEPA threshold flexibility and an infill exemption. See **Chapter 6, Appendix E**.
16	B	3/5/2026	Downtown Spokane Partnership	Cameron, Emilie	Suggests Alternative 3 will strengthen downtown's competitive role as economic/employment hub, concentrated housing/employment downtown will support small businesses/retail recovery, and it aligns with centers-and-corridors growth strategy.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3. It includes moderate-high density near major transit lines and in areas with planned capacity, including downtown, and increased mixed-use and commercial uses downtown and throughout the city. See the Draft Growth Strategy Element, available under PlanSpokane Chapter Review, that includes the City's updated approach to Urban Hubs reflected in the Preferred Alternative in this Final EIS.
16	C	3/5/2026	Downtown Spokane Partnership	Cameron, Emilie	Prefers Alternative 3 for reduced environmental impacts associated with sprawl.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity.
16	D	3/5/2026	Downtown Spokane Partnership	Cameron, Emilie	Prefers Alternative 3 for focus on concentrated housing and jobs downtown - benefits of housing in proximity to employment and services.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity, including downtown.

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16	E	3/5/2026	Downtown Spokane Partnership	Cameron, Emilie	Prefers Alternative 3 for maximizing existing transit investments and reduced infrastructure costs.	The comment is noted; preferences for Alternative 3 is forwarded to City decision-makers. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses growth where there are transit investments and reduced infrastructure costs.
16	F	3/5/2026	Downtown Spokane Partnership	Cameron, Emilie	Prefers Alternative 3 for the mixed-use and walkable focus.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3, including increased mixed-use and commercial uses throughout the city, to promote walkability and access to services.
16	G	3/5/2026	Downtown Spokane Partnership	Cameron, Emilie	Emphasizes imbalance of housing and employment activity Downtown. Suggests increasing residential population downtown will activate streets, public spaces, support retail, increase safety, and increase downtown tax base. Cites 2025 Downtown Housing Study and need for 3,200 market-rate units downtown, and structural barriers to development in general.	The Preferred Alternative is a blend of Alternatives 2 and 3 and it focuses growth in the Downtown area as illustrated in Final EIS **Chapter 2** and **Section 3.5**.

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16	H	3/5/2026	Downtown Spokane Partnership	Cameron, Emilie	Recommends comprehensive plan policies should include streamline development to accelerate housing production including 1) expanded SEPA infill exemptions and reduce duplicative environmental review 2) predictable/expedited permitting for downtown projects, 3) code modernization/simplified regulation to align with growth goals	The comment is noted. The Preferred Alternative includes expanded SEPA exemptions including an infill exemption. The City is preparing code changes to modernize and simplify regulations through BUILDSpokane, summarized in **Chapter 2** of the Final EIS.
16	I	3/5/2026	Downtown Spokane Partnership	Cameron, Emilie	Recommends comprehensive plan policies should include implementing policies that specifically encourage downtown housing, including 1) expanding the 8-year MFTE program to 12 years for projects in the urban core, 2) incentives for adaptive reuse of underutilized office buildings, 3) Strategic use of tax increment financing or public infrastructure investments.	The comment is noted and forwarded to City decision-makers. The EIS evaluates action alternatives including the Preferred Alternative that update the Housing Element and respond to State requirements to make adequate provisions for housing. See **Section 3.5** of the Final EIS. See the Draft Comprehensive Plan for the City's updated Housing Element Policies.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
16	J	3/5/2026	Downtown Spokane Partnership	Cameron, Emilie	Recommends comprehensive plan policies should be competitive in attracting major employers in emerging sectors, including 1) encourage innovation districts and job clusters around major institutions and campuses, 2) flexible mixed-use zoning, 3) incentives for development near education/medical facilities, 4) concentrating housing near employment for reduced commutes.	The comment is noted and forwarded to City decision-makers. The Preferred Alternative promotes housing near employment by focusing growth in hubs in Downtown and Hillyard and along corridors with frequent transit.
16	K	3/5/2026	Downtown Spokane Partnership	Cameron, Emilie	Suggests City investment in 1) utility/infrastructure capacity, streetscape/walkability improvements to support higher density housing, 2) and transportation connecting downtown to employment hubs, 3) and in parks, public safety, public services, and coordinated with private development.	The comment is noted. The EIS evaluates public services and utilities. The City has a transportation element and capital improvement program and a capital facility plan that are being updated with the periodic update to match the growth strategy.
17	A	2/18/2026	Friends of Spokane Trees	Stohr, Mary K.	Concern that small lots do not have sufficient space for large trees, which have many environmental benefits.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
17	B	2/18/2026	Friends of Spokane Trees	Stohr, Mary K.	Concern that lack of parking requirements will result in crowded streets, reduced use by walkers/bikers/ skateboarders, increase crime, harm street trees, and reduced safety.	Comment noted. Suggestions for policy changes are outside of the scope of the environmental analysis. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
17	C	2/18/2026	Friends of Spokane Trees	Stohr, Mary K.	Concern that allowance for infill is not resulting in affordable housing.	See **Section 4.3**, Themes 1, 2, and 3. See also **Section 3.5** of the Final EIS. Greater housing production is a way to reduce prices overall such as through filtering.
17	D	2/18/2026	Friends of Spokane Trees	Stohr, Mary K.	Concern that new development is/will result in destruction of existing trees.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
17	E	2/18/2026	Friends of Spokane Trees	Stohr, Mary K.	Concern that mixed-use retail in the middle of neighborhoods, along with lack of parking requirements, will increase threats to neighborhoods and trees.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
17	F	2/18/2026	Friends of Spokane Trees	Stohr, Mary K.	Opposes blanket environmental review exemption in order to protect trees and land.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
17	G	2/18/2026	Friends of Spokane Trees	Stohr, Mary K.	Concern that Draft EIS does not help the City achieve goal of 30% canopy by 2030. Also concerned that not enough attention is paid to SpoCanopy program emphasizing environmental equity.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
17	H	2/18/2026	Friends of Spokane Trees	Stohr, Mary K.	Concern that Alternative 2 & 3 will result in negative impacts to natural areas and neighborhoods. Prefer the City adopt the best from both alternatives to achieve the goals of protecting neighborhoods, increasing environmental integrity, and reaching environmental goals, and provision of affordable housing.	The Preferred Alternative does address features from Alternative 2 and 3. See also **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review. "
17	I	2/18/2026	Friends of Spokane Trees	Stohr, Mary K.	Urges the mayor to do something about planning department promoting policies and practices that are antithetical to the maintenance of healthy neighborhoods and environment.	The comment is noted and forwarded to City decisionmakers. Please note that the City is required to fulfill GMA requirements to meet housing targets and also to protect critical areas. In addition, through BUILDSpokane, the City is proposing to add detail to landscaping and expand tree preservation incentives.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
18	A	2/18/2026	Futurewise	Frickleton, Brooke	Concern that the Draft EIS may not be compliant with WAC and RCW, when it comes to the transportation analysis. The Final EIS should compare per capita VMT under each alternative against existing conditions. Also concerns around greenhouse gas emission reduction, and VMT reduction. 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 current per capita VMT is compared to the results of the EIS alternatives in **Section 3.2 Air Quality**. The current VMT is included in the Transportation section as well in **Exhibit 3.7-16** comparing Existing to No Action; the current VMT per capita is added to similar tables for Alternatives 2 and 3 and the Preferred Alternative in the Final EIS **Section 3.7**. The Draft Comprehensive Plan (https://my.spokanecity.org/planspokane/chapter-review/) includes Appendix 3 Transportation; it contains a 20-year Transportation Facilities Plan which indicates the City is setting a realistic target of keeping VMT per capita at existing levels as a reasonable sign of progress for the Department of Commerce five-year check-in, and reduced by 5% of existing VMT over the 20 year planning period. Appendix 3 contains a VMT analysis memo identifying the most effective VMT reduction measures for the City including mixed use along transit corridors, infill development, missing middle housing, reducing parking requirements, implementing TDM, and increasing multimodal capacity. The Preferred Alternative, like other alternatives, builds on the City's missing middle housing program under the No Action Alternative and it promotes infill and higher density housing particularly along frequent transit corridors. The City has reduced parking requirements. The City has participated in commute trip reduction and other TDM Programs and has policies to enhance TDM efforts.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
18	B	2/18/2026	Futurewise	Frickleton, Brooke	The EIS should more fully account for the environmental significance of the VMT difference between Alternative 2 and Alternative 3. Differences carry material climate significance. The Draft EIS acknowledges that Alternative 2 produces the lowest transportation emissions of any alternative (Draft EIS p. 3-49), yet the transportation impact findings treat both action alternatives as equivalent. The greater VMT seems to be driven by employment in West Plains and Hillyard where there is limited transit.	As noted by the commenter, the information on VMT is available to City decision-makers. See Response to Comment 18-A. Alternative 2 tests employment lower than Alternative 1 (No Action/SRTC regional projection) and Alternative 3, the higher bookend. That is a key reason for the VMT differences between Alternatives 2 and 3. Alternative 1 No Action that tests growth consistent with the regional housing growth allocations and SRTC job assumptions. All action alternatives improve conditions over Alternative 1 No Action. The Action Alternatives increase the share of walk trips. This is true for Alternative 3 which has VMT per capita that improves over Alternative 1 because it places more growth Downtown. The Preferred Alternative improves VMT over all studied alternatives. It focuses growth in urban hubs and particularly Downtown. It includes mid-range job numbers consistent with Alternative 1 No Action and the SRTC job projections. Climate policies are meant to support VMT reduction as noted in Response to Comment 18-A.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
18	C	2/18/2026	Futurewise	Frickleton, Brooke	The Spokane Valley-Rathdrum Prairie Aquifer is a federally designated sole-source aquifer and deserves commensurate analysis in the Final EIS. Includes specific recommendations. 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.	See Response to Comment 12-P.
18	D	2/18/2026	Futurewise	Frickleton, Brooke	The Final EIS should assess whether existing water rights are sufficient to serve projected growth under each alternative.	The EIS uses the 2023 Water System Plan as a basis. Please note the City of Spokane assesses whether their water rights are adequate to meet the needs of future growth in their Water System Plans which are submitted to Washington Department of Health, and thus that analysis is outside the scope of this EIS for the Comprehensive Plan periodic update. Please also see Response to Comment 4-G.
18	E	2/18/2026	Futurewise	Frickleton, Brooke	The Final EIS should specifically analyze the interaction between projected West Plains growth and the identified PFAS contamination in that area.	See **Section 4.3**, Theme 9: Water.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
18	F	2/18/2026	Futurewise	Frickleton, Brooke	Higher-density, compact growth supports aquifer sustainability — an additional environmental advantage of Alternative 2. 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 likely to generate less water demand than Alternative 3.	Comment noted. **Section 3.9 Utilities** does discuss the difference between water usage in single-family and multi-family dominant systems, but the Final EIS adds additional notes based on the US EPA documented findings. These are not quantified in the EIS but can be addressed in future Water System Plan updates. Also see **Section 4.3** Theme response: "Water."
18	G	2/18/2026	Futurewise	Frickleton, Brooke	The Final Plan should demonstrate housing capacity disaggregated by income band. The final Plan's housing element should include a table confirming sufficient zoned and buildable capacity exists for each income tier.	Comment noted. Please see the estimate of added capacity in needed unit types under the Preferred Alternative in Final EIS **Chapter 2**, **Section 2.4**. The City's Draft Comprehensive Plan includes a Housing Element technical appendix as part of Draft Chapters with evaluation under GMA requirements: https://my.spokanecity.org/planspokane/chapter-review/.
18	H	2/18/2026	Futurewise	Frickleton, Brooke	The Final Plan's policy response should match the strength of the disparate impacts diagnosis. Recommends the Final Plan to include specific, mandatory anti-displacement tools such as: targeted rezoning in historically excluded neighborhoods rather than only	Comment noted. The EIS includes a table of anti-displacement measures under consideration at **Chapter 3, Section 3.5.3**. The draft Comprehensive Plan (August 2026) includes a variety of policies that relate to anti-displacement, such as: • Policy N-2.6, Housing Diversity • Policy H-2.12, Preservation, Rehabilitation, Reuse, and Conversion

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
					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.	• Policy H-4.1, Affordability Requirements • Policy H-4.2, Lower-Income Housing Supply • Policy H-4.4, Siting of Subsidized Lower-Income Housing • Policy H-5.3, Mix of Incomes • Policy H-7.1, Tenant Displacement • Policy H-7.2, Financial Relief • Policy H-7.4, Displacement Monitoring • Policy GS-2.3, Displacement Risk • Policy GS-3.1, Addressing Housing Displacement • Policy GS-5.1, Designate and Plan Urban Hubs Suggestions for future planning are outside of the scope of the environmental analysis. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
18	I	2/18/2026	Futurewise	Frickleton, Brooke	The heavy reliance on statewide EV and electricity mandates to achieve GHG reduction targets raises questions of local accountability: what does Spokane's own plan contribute?	See **Section 4.3** Response to Theme 10. The City's Draft Transportation Element and Appendix includes the policies that are projected to provide the most effective VMT reduction. See: https://my.spokanecity.org/planspokane/chapter-review/. See Draft Plan Appendix 2 for the list of Climate policies in the City's plan in each element. Also see the metrics included for plan monitoring in **Chapter 2** Community Indicators. The City's climate element policies considered Commerce's Menu of Measures and high priority policies for GHG reduction and resilience including consideration through a Multi-Criteria Prioritization Analysis suggested in Commerce guidance. The policies were developed in conjunction with the Climate Resilience and Sustainability Board and Plan Commission. The meeting materials and evaluations are available at: https://my.spokanecity.org/planspokane/climate-planning/ and https://my.spokanecity.org/bcc/boards/climate-resilience-and-sustainability-board/.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
18	J	2/18/2026	Futurewise	Frickleton, Brooke	The Final EIS should include a "policy wedge" analysis isolating the GHG reductions attributable to Spokane's specific land use decisions from the reductions that would occur regardless under state law.	See **Section 4.3** Response to Theme 10. The purpose of the EIS is to evaluate the environmental impacts of the alternatives, rather than attribute future GHG reductions to specific policies. The EIS identifies major state policies expected to influence future emissions and discusses their implications for Spokane's emissions trajectory. A policy wedge analysis has been completed in association with the City's Climate planning, setting of GHG targets, and GHG monitoring efforts; see https://my.spokanecity.org/publicworks/environmental/ and the associated story map. Per GHG monitoring, VMT reduction is needed as well as decarbonizing/reducing fossil fuel use. VMT reductions are addressed in Response to Comment 18-A. Other actions the City has taken include adopting the latest state energy code, reducing parking, promoting adaptive reuse, and preserving materials from historic buildings, etc. These efforts are added to the description of mitigation measures in Final EIS **Section 3.2 Air Quality and Greenhouse Gas Emissions.**

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
18	K	2/18/2026	Futurewise	Frickleton, Brooke	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.	See Response to Comment 18-J. The Final EIS **Section 3.2** refers to the features of existing and proposed policies and codes that address air quality impacts. The Preferred Alternative blends features of Alternatives 2 and 3 and has lower VMT than the other alternatives. Please see the Draft Transportation Element that includes policies for TDM under Draft Goal: TR-9, Achieve Climate Goals: https://my.spokanecity.org/planspokane/chapter-review/. The Draft Comprehensive Plan includes Appendix 3 Transportation identifying the most effective VMT reduction measures which are incorporated into Draft Plan Policies. Please see the Draft Indicators Element for the City's GHG and VMT indicators and monitoring. Desired policy changes related to the Comprehensive Plan are forwarded to City decision-makers.
18	L	2/18/2026	Futurewise	Frickleton, Brooke	Encourages selection of Alternative 2 due to environmental advantages across transportation, GHG emissions, water demand, and housing affordability. Recommends making those advantages explicit in the preferred alternative selection rationale.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity. The Preferred Alternative also includes increased mixed-use and commercial uses throughout the city, supporting walkability and access to services.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
19	A	2/18/2026	Gonzaga Institute for Climate, Water, & the Environment	Jester, Dante	Does not have much feedback after review. Mentions possibility of further detailed review/feedback related to the Institute for Climate, Water, and the Environment if needed/beneficial.	Comment noted and forwarded to decision-makers.
19	B	2/18/2026	Gonzaga Institute for Climate, Water, & the Environment	Jester, Dante	Supports Resilience Hubs as a mitigation measure. Recommends including Ventilation Corridors for cooling/improved air quality, updating SMC to require cool roofing on new construction, and a preference for preserving/installing green infrastructure whenever possible.	The comment is noted. The Action Alternatives including the Preferred Alternative include updated Climate Element policies. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers. The Draft Comprehensive Plan (August 2026) includes draft Policy CH-10.1 Resilience Hubs. Ventilation corridors are mentioned in draft Policy CH-1.7 Equitable Investments for Community Resilience. Heat mitigating roofs are mentioned in draft Policy DP-3.7 Heat Mitigation Features. Several policies in Natural Environment discuss street trees and other green infrastructure.
20	A	2/18/2026	Painter Preservation	Painter, Diana J.	Prefers Alternative 2 due to connectivity, BRT on Division, open space, protection of natural land, and infill development of vacant lots/parking lots downtown and along arterials.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and includes increased density in some areas of the city such as along the Division corridor.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
20	B	2/18/2026	Painter Preservation	Painter, Diana J.	Concern that adverse impacts to cultural resources cannot apparently be mitigated under any alternative.	**Section 3.4.3** identifies mitigation measures for cultural and historic resources including advanced planning and potential decision tree for cultural resources. **Section 3.4.4** indicates that while all alternatives have the potential for significant adverse impacts, the impacts can be avoided, minimized, or mitigated with " [a] well-designed and implemented citywide historic preservation plan and pre-project historic and cultural resource review process is the most effective way to avoid, minimize, or mitigate adverse impacts."
20	C	2/18/2026	Painter Preservation	Painter, Diana J.	Does not support eliminating, relaxing, or streamlining policies and regulations in order to achieve other goals (e.g., housing density/urban infill).	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
21	A	1/21/2026	Rockwood Retirement Communities	Maxwell, Jim	General support for increased housing density allowances which would help future developments for senior housing and associated employment.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3, particularly near transit and in areas with planned capacity.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
22	A	2/18/2026	Spokane Falls Community College Environmental Club	Hultman, Ella	Concern over fire danger due to lack of snowpack and statewide drought conditions. Would like to see more drought resistant plants and less water usage of decorative/ recreational activities in the City.	Comment noted. As noted in **Sections 3.1 and 3.9** drought is a concern for water supplies. The City's Comprehensive Plan refers to water conservation. The Draft Comprehensive Plan (August 2026) includes related policies, such as: • NE-2.1, Water Conservation Strategy • NE-2.3, Landscaping Requirements and Incentives • NE-2.1, Native Vegetation on Public Lands • NE-2.6, Water Management Support • NE-5.2, Public Native Species Application and Education

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22	B	2/18/2026	Spokane Falls Community College Environmental Club	Hultman, Ella	Would like to see greater tree cover for heat distribution and air quality improvements during fire season.	Comment noted. Final EIS **Sections 3.3.3 and 3.4.3** discusses the alternatives' potential impacts to tree canopy. The Draft Comprehensive Plan (August 2026) includes related policies such as: • DP-1.17, Urban Trees and Landscaping in All Development • DP-3.6, Resilience to Extreme Heat • DP-3.9, Incorporating Natural Designs in Public Spaces • GS-7.9, Tree Canopy • NE-10.1, Street Trees • NE-10.2, Urban Forestry Programs • NE-10.4, Tree Replacement Program • NE-10.5, Promote the Growth of an Urban Tree Canopy • NE-5.1, Native and Non-Native Adaptive Plants and Trees
22	C	2/18/2026	Spokane Falls Community College Environmental Club	Hultman, Ella	We would like to see collaborations with institutes and municipalities to reduce current groundwater PFAS levels and make regulations of the usage of PFAS.	See **Section 4.3**, Theme 9: Water. Efforts by the City to address PFAS contamination – while outside of the scope of this EIS – can be found at https://my.spokanecity.org/publicworks/water/quality/.

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22	D	2/18/2026	Spokane Falls Community College Environmental Club	Hultman, Ella	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.	The reintroduction of fish populations is outside the scope of this EIS. Several of the measures identified in **Section 3.1.3** Earth, Water Quality, and Water Resources Mitigation Measures and **Section 3.3.3** Plants and Animals Mitigation Measures would have beneficial effects on in-stream fish habitat. These benefits include upgrade and expansion of stormwater management to better capture pollutants and prevent release to water resources; restoration of shoreline habitats; expansion and management of Spokane's tree canopy; consideration of opportunities to develop additional incentive programs and resources for habitat conservation and restoration; and incorporating adaptive management provisions into shoreline and critical areas regulations. The City has proposed updates to its Natural Environment Element policies including policy NE-3.5 Aquatic and Upland Habitat, which specifically calls out anadromous fish.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
23	A	2/18/2026	Spokane Riverkeeper	Scott, Katelyn	Planning, growth, and development, in the Spokane River watershed must consider current salmon/trout habitat needs and future salmon reintroduction. This requires cool, clean flows, intact riparian buffers, and healthy in-stream/floodplain habitat, all of which are influenced by land use, stormwater management, and groundwater withdrawals. Urges for proactive measures now, such as protecting undeveloped lands, reducing impervious surfaces, restoring shoreline vegetation, and maintaining sustainable aquifer and river flows.	The reintroduction of salmon populations is outside the scope of this EIS. Several of the mitigation measures identified in **Section 3.3.3** would have beneficial effects on in-stream fish habitat, including restoration of shoreline habitats; expansion and management of Spokane's tree canopy; consideration of opportunities to develop additional incentive programs and resources for habitat conservation and restoration; and incorporating adaptive management provisions into shoreline and critical areas regulations. Focusing new growth in more densely developed areas and along major transit and transportation corridors will help to minimize the incremental increase in new impervious surfaces in currently undeveloped areas as Spokane's population continues to grow. Also see **Section 4.3** Theme response: "Water."
23	B	2/18/2026	Spokane Riverkeeper	Scott, Katelyn	The Draft EIS must account for the interconnection of the Aquifer and Spokane River by prioritizing conservation, sustainable water use, and recharge protection in land-use planning. Including environmental assessments to ensure water resources remain intact.	Comment noted. The City maintains several programs and measures aimed to prioritize water conservation from irrigation scheduling, repairing main leaks, and providing rebates for xeriscaping. These programs will be maintained in the updated Comprehensive Plan. Also see **Section 4.3** Theme response: "Water."

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
23	C	2/18/2026	Spokane Riverkeeper	Scott, Katelyn	Draft EIS should explicitly ensure that environmental review protects river-adjacent lands, floodplains, and undeveloped recharge areas. Development should incorporate river-friendly stormwater management, low-impact development, riparian buffers, and green infrastructure to prevent sediment and nutrient loading.	**Section 3.1.1** Earth, Water Quality, and Water Resources Affected Environment identifies potentially affected shorelines, floodplains, and aquifer recharge areas in the study area. As stated in **Section 3.1.2** Impacts and **Section 3.1.3** Mitigation Measures, future development associated with the selected alternative would have to comply with applicable regulations, which encompass critical area protections, river-compatible stormwater management, protection of riparian buffers, and the use of low impact development approaches.
23	D	2/18/2026	Spokane Riverkeeper	Scott, Katelyn	Pollution in the Spokane River is worsened by homeless camps in the area. Existing programs that integrate trash removal, outreach, and support services, like river keeper floating clean-up and medical outreach model, should be expanded.	It is noted that homeless encampments can contribute to water quality degradation. As stated in **Section 3.5 Population, Employment, and Housing**, under all alternatives, the City would continue programs and regulations to address homelessness. Also, as stated in **Section 3.8 Public Services**, a key priority for the City through 2026 is to deploy holistic, all-city strategies to address quality of life issues, including homelessness and drug use.

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
23	E	2/18/2026	Spokane Riverkeeper	Scott, Katelyn	Managing growth and housing affordability is a social and environmental imperative. Ensuring safe, accessible housing options throughout the city reduces pressure on river corridors, decreases volume of trash entering the River, and supports river stewardship already underway by organizations like Spokane Riverkeeper.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity.
23	F	2/18/2026	Spokane Riverkeeper	Scott, Katelyn	Draft EIS and Comprehensive Plan Update must treat the Spokane River and SVRP Aquifer as central to the city's environmental, social, and economic health. Includes 7 specific recommendations.	The plan-incorporated mitigation and other recommended mitigation measures identified in **Section 3.1.3** Earth, Water Quality, and Water Resources Mitigation Measures include compliance with regulations that address the use of low impact development where feasible, address additional stormwater management to better capture pollutants and prevent release to water resources (including groundwater), and standards and restrictions for development within flood hazard areas. In addition, **Section 3.3.3** Plants and Animals Mitigation Measures presents measures to protect and safeguard terrestrial and riparian habitat, limit clearing and soil disturbance in critical areas generally, and update protections within Fish and Wildlife Conservation and Floodplain critical areas. Also see **Section 4.3** Theme response: "Water."

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24	A	2/17/2026	Visit Spokane	Noble, Rose	Tourism (year round) should be a main economic driver and essential to residents' quality of place, should be considered in planning decisions related to land use, transportation, infrastructure, arts and culture, and neighborhoods.	The comment is noted and forwarded to City decision-makers. The City's share of leisure and hospitality jobs is shared on Final EIS **Exhibit 3.5-17**. The City's current Comprehensive Plan and the periodic update address Economic Prosperity. Tourism promotion is included in Goal EP-9 of the Draft Comprehensive Plan. See: https://my.spokanecity.org/planspokane/chapter-review/.
24	B	2/17/2026	Visit Spokane	Noble, Rose	Visit Spokane wants to be a partner in shaping the city Spokane is becoming. Includes specific list of decisions they would like to participate on.	Comment noted. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers. Please see the City's website for ways to share input to the Comprehensive Plan and other initiatives such as BUILDSpokane: https://my.spokanecity.org/planspokane/.
24	C	2/17/2026	Visit Spokane	Noble, Rose	Investments in public art, cultural districts, events, and neighborhood gathering spaces are economic infrastructure.	Comment noted. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers. The Draft Comprehensive Plan (August 2026) includes related policies, such as: • CH-3.1, Municipal Arts Program • CH-3.2, Support for the Arts • N-2.5, Neighborhood Arts • CH-4.3, Inclusive Events • CH-4.5, Community Festivals and Events • EP-9.3, Tourism and Events as an Economic Benefit • N-3.3, Gathering Places

Final EIS Comment #	Sub-Comment Id	Date of Comment	Organization	Commenter	Summary of Comment	Response
24	D	2/17/2026	Visit Spokane	Noble, Rose	Planning for growth without proportional investment in experiences risks weakening both resident satisfaction and economic returns.	Comment noted. See Response to Comment 24-C for draft policies related to experiences.
24	E	2/17/2026	Visit Spokane	Noble, Rose	A list of 9 specific recommended actions around planning for and incorporating tourism into the City's growth plans.	Comment noted. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers. The Draft Comprehensive Plan includes related draft policies including Goal EP-3, Tourism Promotion.

Individuals

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
25	A	2/17/2026	Addy, Prudence	Concern that growth plans focus on housing rather than conscious communities. Stresses natures ability to heal outweighing current needs.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
26	A	3/2/2026	Adler, Diane	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
26	B	3/2/2026	Adler, Diane	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
26	C	3/2/2026	Adler, Diane	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
26	D	3/2/2026	Adler, Diane	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
27	A	2/18/2026	Agee, Alyssa	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
27	B	2/18/2026	Agee, Alyssa	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
27	C	2/18/2026	Agee, Alyssa	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
27	D	2/18/2026	Agee, Alyssa	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
28	A	2/19/2026	Ahlborn, Yvonne	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
28	B	2/19/2026	Ahlborn, Yvonne	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
28	C	2/19/2026	Ahlborn, Yvonne	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
28	D	2/19/2026	Ahlborn, Yvonne	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
29	A	3/5/2026	Allen, David	Concern that none of the proposed plans deliver walkability and reduced VMT.	See **Section 4.3** Theme response: "Mixed use and development."
29	B	3/5/2026	Allen, David	Concern that increased density without walkability improvements will not strengthen neighborhood main streets but will result in more areas in Spokane like 29th & Grand, Wellesley, Francis, and Division, or in more areas like Aurora (hwy99) in Seattle.	See **Section 4.3** Theme response: "Mixed use and development."
29	C	3/5/2026	Allen, David	To increase walkability, suggests 1) safe/pleasant destinations, 2) residential in close proximity to employment	See **Section 4.3** Theme response: "Mixed use and development."
29	D	3/5/2026	Allen, David	To achieve VMT goals, suggests human scale street design/development standards where people feel safe walking. Gives specific examples.	See **Section 4.3** Theme response: "Mixed use and development."

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29	E	3/5/2026	Allen, David	Concern that Alternative 2 focuses too much on corridor density and does not demonstrate sufficient mixed-use and neighborhood retail throughout neighborhoods. Suggests new neighborhood commercial nodes on adjacent main streets, not necessarily corridors - Garland and Grand, not Monroe or 29th. Includes additional specific locations for intensity on the South Hill	See **Section 4.3** Theme response: "Mixed use and development."
29	F	3/5/2026	Allen, David	Concern that nodes do not have enough concentration of desirable services and residential intensity within 1/4 mile. Suggests increasing either residential or commercial intensity without the other will not increase walkability.	See **Section 4.3** Theme response: "Mixed use and development."
29	G	3/5/2026	Allen, David	Suggests that once proper intensity and walkable nodes are identified, make them categorically exempt from SEPA. Suggests development within identified nodes and their 1/4-mile walksheds should be streamlined.	See **Section 4.3** Theme response: "Support for streamlined environmental review."
29	H	3/5/2026	Allen, David	Emphasizes the value of Spokane's access to nature, relative affordability, and quality of life, while also emphasizing the need for less car dependence and more neighborhood services within walking/biking distance.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity. The Preferred Alternative also includes increased mixed-use and commercial uses throughout the city, supporting walkability and access to services. Proposed policy changes address access to nature and aim to increase affordability.

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30	A	2/18/2026	Allen, Joshua	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
30	B	2/18/2026	Allen, Joshua	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
30	C	2/18/2026	Allen, Joshua	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
30	D	2/18/2026	Allen, Joshua	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
31	A	2/17/2026	Amidon, Andy	Prefers Alternative 3 due to long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
31	B	2/17/2026	Amidon, Andy	Recommends clear guardrails before broadly applying environmental review exemption.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
31	C	2/17/2026	Amidon, Andy	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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32	A	2/18/2026	Angell, Kirsten	Recommendation that Alternative 2 & 3 be evaluated with the understanding that the only housing needed is in the lower income categories.	Comment noted. Final EIS **Section 3.5** evaluates how the alternatives address housing needs for all income bands.
32	B	2/18/2026	Angell, Kirsten	Prefers Alternative 3 due to greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
32	C	2/18/2026	Angell, Kirsten	Prefers Alternative 3 conditioned on adequate evaluation of environmental impacts from EIS and Comp Plan	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3. The Final EIS includes analysis of impacts of the Preferred Alternative.
32	D	2/18/2026	Angell, Kirsten	Supports infill for achieving affordable housing while avoiding expansion of UGA.	Comment noted. The Preferred Alternative uses infill as a strategy to accommodate the city's housing needs.
32	E	2/18/2026	Angell, Kirsten	Recommends inventory of the city's green infrastructure to protect ecological and climate resilience.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
32	F	2/18/2026	Angell, Kirsten	Opposes blanket environmental review exemption in order to protect tree coverage critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Supports fast-tracing SEPA review on lands that are already mostly impervious - particularly if development is for affordable housing.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
32	G	2/18/2026	Angell, Kirsten	Recommend adding language to the comprehensive plan: "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	Comment noted. See Theme 1 in **Section 4.3**. The Draft Comprehensive Plan includes a draft policy that relates to this comment: Policy NE-15.3, Ecosystems Inventory Database. Action alternatives including the Preferred Alternative assume updated policies to reflect critical areas protection and climate resilience.

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				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."	
32	H	2/18/2026	Angell, Kirsten	Recommends integrating wildlife movement and habitat connectivity into local, regional and transportation planning, including coordination with Washington Habitat Connectivity Action Plan.	Comment noted. Region-wide habitat connectivity planning is outside the scope of this EIS. The Washington Habitat Connectivity Action Plan assigns a habitat connectivity value of 0 to 1 – the lowest value - to the entire City of Spokane. The thresholds of significance used in evaluating the alternatives included consideration of potential permanent habitat conversion, or loss of habitat connectivity sufficient to compromise overall regional ecosystem function (See **Section 1.4.3**). None of the alternatives were determined to have significant impacts on habitat connectivity. Focusing new growth in more densely developed areas and along major transit and transportation corridors will help to minimize the loss of existing habitat connectivity as Spokane's population continues to grow.
32	I	2/18/2026	Angell, Kirsten	Recommends a moratorium on removal of large green infrastructure until the city can map/inventory our natural areas of value, including potential connectivity to each other.	Comment noted. See Response to Comment 32-G. The City critical areas regulations and definitions are used with critical areas mapping and site specific studies. The City regulations refer to priority habitats and species and the State WDFW has mapped biodiversity corridors and other habitats. See **Exhibit 3.3-4**. Natural Resource Designations in the City of Spokane. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.

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32	J	2/18/2026	Angell, Kirsten	Recommends against development of previous agricultural land within and close to the UGA. Agricultural land should be protected through zoning and incentives to increase community resilience. Specifically, Vinegar Flats and Five Mile prairie.	Comment noted. The City allows agricultural activities in its zoning and has proposed policies with the action alternatives including the Preferred Alternative to support urban agriculture in support of food systems (for example Draft Goal: CH-9, Food Access and Security in Community Health Chapter). It should be noted that per the GMA, Spokane County has the responsibility of identifying lands of long-term commercial significance for agriculture and these cannot be included in an urban growth area unless there is a transfer of development rights program.
33	A	3/5/2026	Apple, Robert	Urges following GMA requirements for any expected city growth in population but has concerns.	Comment noted. The Final EIS and draft Comprehensive Plan include the required elements to meet GMA requirements.
34	A	2/17/2026	Arksey, Meredith	Please choose Alternative 3.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
35	A	2/17/2026	Barry, Jane	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
35	B	2/17/2026	Barry, Jane	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
35	C	2/17/2026	Barry, Jane	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
35	D	2/17/2026	Barry, Jane	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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36	A	2/18/2026	Bartoo Jacobson, Mari	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
36	B	2/18/2026	Bartoo Jacobson, Mari	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
36	C	2/18/2026	Bartoo Jacobson, Mari	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
36	D	2/18/2026	Bartoo Jacobson, Mari	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
37	A	2/18/2026	Bauer, Sara	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
37	B	2/18/2026	Bauer, Sara	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
37	C	2/18/2026	Bauer, Sara	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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37	D	2/18/2026	Bauer, Sara	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
38	A	3/5/2026	Bender, Thomas J	Concern that the Draft EIS does not project STA ridership increase over the next 20-years. Concern that increase in population without increased STA ridership will harm the environment. Urges EIS to call for the plan to encourage greater STA use and project an increase in STA ridership as a result.	See **Section 4.3** Theme response: "Transit and Infrastructure."
39	A	2/18/2026	Benefield, Jeff	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
39	B	2/18/2026	Benefield, Jeff	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
39	C	2/18/2026	Benefield, Jeff	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
39	D	2/18/2026	Benefield, Jeff	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
40	A	1/14/2026	Bennett, Blaine & Marcella	Example of neighborhood impacts from a 48-unit building complex on Five Mile Rd and Audubon.	The City applies plans and zoning in place at the time of development applications to meet levels of service and site design. Please see updated policies regarding Neighborhoods, Transportation, and Other. The City is developing updated

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					regulations to improve its code such as landscaping, called BUILDSpokane.
41	A	2/17/2026	Bienemann, Tom	Prefers Alternative 3, does not believe we will compromise the environment.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
42	A	2/18/2026	Bishop, Mary	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
42	B	2/18/2026	Bishop, Mary	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
42	C	2/18/2026	Bishop, Mary	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
43	A	2/18/2026	Blalock, Carma	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.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
44	A	2/18/2026	Blessing, Sommer	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
44	B	2/18/2026	Blessing, Sommer	Supports strong rules to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
44	C	2/18/2026	Blessing, Sommer	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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45	A	2/18/2026	Boardman, Julie & Laverne, Hopson, Charles	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
45	B	2/18/2026	Boardman, Julie & Laverne, Hopson, Charles	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
45	C	2/18/2026	Boardman, Julie & Laverne, Hopson, Charles	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
45	D	2/18/2026	Boardman, Julie & Laverne, Hopson, Charles	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
46	A	2/19/2026	Bowden, Kristel	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
46	B	2/19/2026	Bowden, Kristel	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
46	C	2/19/2026	Bowden, Kristel	Opposes blanket environmental review exemption in order to protect critical areas,	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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				wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	
46	D	2/19/2026	Bowden, Kristel	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
47	A	2/18/2026	Boyle, Dee	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
47	B	2/18/2026	Boyle, Dee	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
47	C	2/18/2026	Boyle, Dee	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
47	D	2/18/2026	Boyle, Dee	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
48	A	2/18/2026	Boyle, Mark	Concern over lack of environmental impact enforcement. References new development/tree destruction near Underhill Park. Urges retaining enforcement of environmental protections.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
49	A	2/18/2026	Brake, Gene	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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49	B	2/18/2026	Brake, Gene	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
49	C	2/18/2026	Brake, Gene	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
49	D	2/18/2026	Brake, Gene	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
50	A	2/17/2026	Breithaupt, Ciera	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
50	B	2/17/2026	Breithaupt, Ciera	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
50	C	2/17/2026	Breithaupt, Ciera	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
50	D	2/17/2026	Breithaupt, Ciera	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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51	A	2/18/2026	Brooks, Kerry	P 3-3 Terrain discusses slopes. Exhibit 3.1 merely depicts elevation with no representation of slopes. This should be corrected.	Reference to the Hazardous Geology and Contaminated Soils subsection has been added to the Terrain subsection. The Hazardous Geology and Contaminated Soils subsection presents additional discussion of hazardous slopes and a map of landslide hazard areas is presented in **Exhibit 3.1 6. Hazardous Geology**.
51	B	2/18/2026	Brooks, Kerry	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?	As stated in **Section 3.1.2** Impacts and **Section 3.1.3** Mitigation Measures, future development associated with the selected alternative would have to comply with applicable regulations and design standards. This would include limiting stormwater infiltration approaches in areas with shallow bedrock if found to be incompatible.
51	C	2/18/2026	Brooks, Kerry	P 3-14. Floodplains. Have the plan alternatives incorporated the limitations and FEMA recommendations described in the text into their land allocations?	As stated in **Section 3.1.2** Impacts and **Section 3.1.3** Mitigation Measures, future development associated with the selected alternative would have to comply with applicable regulations and design standards. This would include standards and restrictions for development within flood hazard areas. Action alternatives generally focus new development in already developed locations along corridors and in centers like Downtown, with lesser growth in greenfield areas including along the Spokane River in the Northwest neighborhood. The Preferred Alternative focuses less growth in the Northwest than other studied alternatives.
51	D	2/18/2026	Brooks, Kerry	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	As stated in **Section 3.1.2** Impacts and **Section 3.1.3** Mitigation Measures, future development associated with the selected alternative would have to comply with applicable regulations, which include critical area buffers and protection of intermittent waters.

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				protected. Perhaps add language to the mitigation discussion requiring identifying and preserving intermittent water bodies.	
51	E	2/18/2026	Brooks, Kerry	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?	Allocation of units across the city is based on land capacity, plats and PUD permits, and potential changes in intensity. The methodology is added to the Final EIS **Chapter 6, Appendix B.**
51	F	2/18/2026	Brooks, Kerry	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. Important for developing a full representation of "Natural Open Space".	The detailed definitions of the USGS land cover types identified in **Exhibit 3.3-2** and **Exhibit 3.3-3** have been incorporated in this document by reference. A footnote clarifying this, along with a link to the USGS Annual NLCD Land Cover Classification website, where these definitions can be reviewed, has been added to the Final EIS.
51	G	2/18/2026	Brooks, Kerry	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 are smaller habitat corridor pieces.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review." Thank you for your suggestion of additional canopy cover mapping datasets. While a comprehensive canopy cover inventory and habitat corridor inventory is beyond the scope of this EIS, your suggestion will be forwarded to decision-makers involved with habitat connectivity-related elements of the 2026 Comprehensive Plan Periodic Update.

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51	H	2/18/2026	Brooks, Kerry	The Best Available Science from the 2025 Washington Habitat Connectivity Action Plan recommends urban areas conduct fine-grained habitat and connectivity work and incorporate into land use policy/planning. must be done in Spokane prior to finalization of the revised land use map and any land use designations	Suggestions for future studies are outside of the scope of the environmental analysis. Desired policy changes and suggestions for data gathering related to the 2026 Comprehensive Plan Periodic Update will be forwarded to decision-makers. The thresholds of significance used in evaluating the alternatives included consideration of potential permanent habitat conversion, or loss of habitat connectivity sufficient to compromise overall regional ecosystem function (See **Section 1.4.3**). None of the alternatives were determined to have significant impacts on habitat connectivity. Focusing new growth in more densely developed areas and along major transit and transportation corridors will help to minimize the loss of existing habitat connectivity as Spokane's population continues to grow.
51	I	2/18/2026	Brooks, Kerry	A habitat and connectivity dataset can guide appropriate development and intensification while fostering connectivity, limiting fragmentation, restoring lost connectivity and habitats. Should focus on areas of the City that lack habitat, coincide with environmental justice and consideration of climate impacts on overburdened communities.	Suggestions for future studies, data gathering, and area-specific habitat connectivity planning are outside of the scope of the environmental analysis. Suggestions for data gathering and habitat connectivity planning related to the 2026 Comprehensive Plan periodic update will be forwarded to decision-makers.
51	J	2/18/2026	Brooks, Kerry	The discussion as written does not demonstrate how any of the alternatives prevent "no net loss of habitat values and functions." Please correct this omission.	None of the alternatives analyzed in this EIS result in a specific development action that could directly impact critical areas. As noted in **Section 3.3.3**, implementation of existing federal, state, and local regulations including Spokane's Critical Areas Ordinance and Shoreline Master Program, would continue to minimize the impacts of development on terrestrial and aquatic habitat. Following implementation of the Preferred Alternative,

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					any future proposed development with potential to affect critical areas would be required to demonstrate that it would result in no net loss of habitat values and functions. Further, as noted in **Section 3.3.3** under "Incorporated Plan Features," the updated Comprehensive Plan will incorporate review and updates to the Critical Areas Ordinance to reflect best available science. This will further bolster the protection of habitat values and functions within identified critical areas.
51	K	2/18/2026	Brooks, Kerry	The land use plan alternatives and preferred alternative must address the requirement that each county or city identify open space corridors within and between UGAs, including lands useful for recreation, wildlife habitat, trails, and connection of critical areas (RCW), and identify, protect, and enhance natural areas to foster climate resilience and vital habitat for species migration (HB 1181).	Suggestions for future studies, data gathering, and area-specific habitat connectivity planning and policy are outside of the scope of the environmental analysis. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers. **Section 3.3.3** of the Draft EIS lists recommendations and strategies from Spokane's 2025 Climate Vulnerability Assessment that would be incorporated into the Comprehensive Plan Update in compliance with HB 1181. Language has been added to the list to reflect the Climate Vulnerability Plan's recommendations to establish a green belt of parks to support connectivity.

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51	L	2/18/2026	Brooks, Kerry	Concern that the Draft EIS statement that no 'additional' mitigation measures are necessary does not address state requirements.	Because none of the alternatives analyzed in the EIS would result in significant adverse impacts, adherence to existing fish and wildlife habitat protection regulations would be expected to sufficiently minimize adverse development impacts under all studied alternatives. State law does not confer statutory authority to impose additional mitigation measures on actions where there are no significant effects or potential significant adverse effects have been mitigated below the level of significance (WAC 197-11-660). **Section 3.3.3** identifies federal, state, and local environmental statutes that would minimize the potential impacts to plants and animals, along with additional measures that will be incorporated into the updated Comprehensive Plan and further voluntary actions or strategies to minimize and mitigate potential adverse effects.
52	A	2/18/2026	Brower, Erin	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
52	B	2/18/2026	Brower, Erin	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
52	C	2/18/2026	Brower, Erin	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
52	D	2/18/2026	Brower, Erin	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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53	A	3/5/2026	Bruya, Ed	General preference for Alternative 2	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
54	A	2/18/2026	Burchell, Melissa A	Concern that the City will allow developers to ignore environmental codes and regulations. Urges preservation of natural resources and enforcement of environmental protections.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
55	A	2/18/2026	Burroughs, Sarah	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
55	B	2/18/2026	Burroughs, Sarah	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
55	C	2/18/2026	Burroughs, Sarah	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
55	D	2/18/2026	Burroughs, Sarah	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
56	A	2/18/2026	Carr, Julia	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
56	B	2/18/2026	Carr, Julia	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
56	C	2/18/2026	Carr, Julia	Opposes blanket environmental review exemption in order to protect critical areas,	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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				wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	
56	D	2/18/2026	Carr, Julia	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
57	A	1/20/2026	Carroll, Linda	What leverage does the city have with owners of empty lots on corridors to build multi-family dwellings? Concern that if the empty corridor lots don't develop it will pressure houses 1/4 mile off corridors to be sold/demolished and replaced with rentals resulting in less homeownership. What can the City do to minimize that?	Comment noted. The City sets the regulatory environment in which development occurs including requirements and incentives. It does not build multi-family dwellings or compel property owners to build. The Preferred Alternative identifies locations to allow higher density multi-family dwellings under land use and zoning regulations. This limits this larger development type to specific zones or subareas. Whether houses redevelop into multi-family dwellings or not will depend primarily on the market, in the context of zoning regulations. The Draft Comprehensive Plan includes policies that encourage homeownership opportunities for all incomes and preservation of existing affordable housing where feasible. Draft anti-displacement policies are also included. See also Response to Comment 12-D.
57	B	1/20/2026	Carroll, Linda	The neighborhood councils and community assembly are the bodies that allow residents to express their views. What role do they have in the selection of the preferred alternatives?	See **Section 4.3** Theme response: "Neighborhood councils."
57	C	1/20/2026	Carroll, Linda	With all the inclusion of transit, why does the EIS have the same .015% of travel miles in 2026 and 2046.	Many factors affect transit usage. The alternatives that the City evaluated include improvements to the transportation network

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					that benefit people who drive, take the bus, and walk or bike. This results in a similar transit mode share in the future compared with today. It is important to note that while the percentage share is not assumed to change, the overall growth in the city's population would result in an increase in absolute ridership numbers.
57	D	1/20/2026	Carroll, Linda	What restrictions on the neighborhood as a whole does the designation of historical districts have?	Design and demolition requirements may apply. Income and property tax incentives are also available for the rehabilitation of properties. See Spokane Municipal Code including: Chapter 15.06 Preservation of Salvageable Materials Chapter 17C.335 Historic Structures – Change of Use Chapter 17D.100 Historic Preservation
57	E	1/20/2026	Carroll, Linda	Why does pollution from transit figure so little in the EIS?	Transportation emissions from all types of vehicles are addressed in **Section 3.2 Air Quality and Greenhouse Gas Emissions**. Spokane Transit Authority has a fleet of electric, hybrid, and diesel busses and 25% currently are zero emissions: https://www.spokanetransit.com/wp-content/uploads/2026/07/2027-2032-TDP-Adopted-7.16.26.pdf. See also **Section 4.3** Theme response 10 regarding Air Quality/Greenhouse Gas and Climate Planning.
58	A	2/17/2026	Chitwood, Kathryn D	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
58	B	2/17/2026	Chitwood, Kathryn D	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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58	C	2/17/2026	Chitwood, Kathryn D	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
58	D	2/17/2026	Chitwood, Kathryn D	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
58	E	2/17/2026	Chitwood, Kathryn D	Thermal Energy, heat recovery, agricultural sovereignty, and transition from extraction logic to a circulation economy.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
59	A	2/5/2026	Comstock, Tanya	General comment on the need for identifying low income apartments.	See **Section 4.3** Theme response: "Affordable housing."
59	B	2/5/2026	Comstock, Tanya	Comment on the need for the police department to support community.	Comment noted. Public services are addressed in **Section 3.8** of the EIS. The Draft Comprehensive Plan includes the related policy CH-7, Public Safety. See: https://my.spokanecity.org/planspokane/chapter-review/.
59	C	2/5/2026	Comstock, Tanya	Comment on the need for daily skywalk access.	The comment is noted and forwarded to City decision-makers.
59	D	2/5/2026	Comstock, Tanya	Comment on the need for housing for disabled adults.	Comment noted. The current and future housing needs are addressed in **Section 3.5** of the EIS. The draft Comprehensive Plan (August 2026) includes the related policy H-3.2, Accessible Housing for All Incomes.
60	A	2/17/2026	Christopherson, Deanette	Urges dense development, not sprawl - grow "up not out".	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
60	B	2/17/2026	Christopherson, Deanette	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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60	C	2/17/2026	Christopherson, Deanette	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
60	D	2/17/2026	Christopherson, Deanette	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
60	E	2/17/2026	Christopherson, Deanette	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
61	A	2/6/2026	Comstock, Tanya	General comment on the need for safety at home, good care at hospitals, and help from the police department.	Comment noted. The EIS addresses public services in **Section 3.8**. The Draft Comprehensive Plan includes the related policies CH-7, Public Safety; H-3.2, Accessible Housing for All Incomes; and Ch-1.1, Investment in Community Health. See: https://my.spokanecity.org/planspokane/chapter-review/.
62	A	2/18/2026	Conlin, Karen	Strongly supports protection of wildlife habitat and protection of natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
63	A	2/21/2026	Cooke, Mayson	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
63	B	2/21/2026	Cooke, Mayson	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
63	C	2/21/2026	Cooke, Mayson	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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				neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	
63	D	2/21/2026	Cooke, Mayson	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
64	A	2/18/2026	Coppen, Chris	Concern for natural diversity, affordable housing, and global warming. Especially concerned that meeting development needs will negatively impact tree canopy.	See **Section 4.3** Theme response: "Affordable housing." See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
64	B	2/18/2026	Coppen, Chris	Urges approach to growth that does not reduce the urban tree canopy, including preservation of old-age trees even where development takes place.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
65	A	2/17/2026	Cordero, Julie	Prefers Alternative 3 on the condition that cumulative environmental impacts are adequately evaluated, avoided, and mitigated, by the EIS and Comprehensive Plan.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3. The Final EIS includes analysis on environmental impacts of the Preferred Alternative and mitigation measures.
65	B	2/17/2026	Cordero, Julie	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
66	A	2/17/2026	Costello, Eve	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
66	B	2/17/2026	Costello, Eve	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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66	C	2/17/2026	Costello, Eve	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
66	D	2/17/2026	Costello, Eve	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
67	A	2/13/2026	Crabtree, Margot	Concerns over the need to balance preservation/protection of natural resources and parks - particularly the Spokane River - with the need for infill development.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review." **Section 3.3.3** of the Draft EIS discusses elements to be incorporated into the Comprehensive Plan Update that will encourage restoration of shoreline habitats and strengthen shoreline protections along the Spokane River.
68	A	2/18/2026	Daehlin, Gail	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
68	B	2/18/2026	Daehlin, Gail	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
68	C	2/18/2026	Daehlin, Gail	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
68	D	2/18/2026	Daehlin, Gail	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
69	A	2/26/2026	Daniel, Cait	Concern that Environmental Review Exemption will only benefit developers building homes for higher income individuals and will not benefit low-income residents.	See **Section 4.3** Theme responses: "Tree canopy and habitat / concern about environmental review" and "Affordable housing." Housing affordability is a key topic in the Comprehensive Plan. The City is required to remove barriers to housing affordability and policies in the Draft Comprehensive Plan Housing Element reflect this requirement.
69	B	2/26/2026	Daniel, Cait	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
69	C	2/26/2026	Daniel, Cait	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
69	D	2/26/2026	Daniel, Cait	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
69	E	2/26/2026	Daniel, Cait	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
70	A	3/5/2026	Darrell, Virginia	Request for data supporting infill exemption, including 1) number of residential and commercial units permitted in 2025, 2026, and to date, 2) current vacancy rate for the units by type, 3) projected population growth for the next 20-years, 4) projected impact of this growth on water supplies, wastewater treatment	See EIS **Section 3.5**, which shows housing unit and job trends and expected growth. Impacts of the studied alternatives are reviewed related to air quality (**Section 3.2**), police and fire (**Section 3.8**) and utilities (**Section 3.9**).

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
				capacity, solid waste management, energy, air quality, police and fire response.	
70	B	3/5/2026	Darrell, Virginia	Concern that the exemption may affect quality of life due to increased density and stressed resources. Would like opportunity to vote on the change.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
71	A	2/17/2026	Dascher, Erin	Prefers Alternative 3 due to greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
71	B	2/17/2026	Dascher, Erin	Prefers Alternative 3 conditioned on adequate evaluation of environmental impacts from EIS and Comp Plan	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
71	C	2/17/2026	Dascher, Erin	Recommends clear guardrails before broadly applying environmental review exemption.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
71	D	2/17/2026	Dascher, Erin	Recommends inventory of the city's tree canopy, habitat, ecological connectivity, environmental resources.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
71	E	2/17/2026	Dascher, Erin	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
72	A	3/5/2026	Davi, Vincent	Protecting the Spokane River should remain a top priority. Future growth should make sure the river stays clean, healthy, and safe for wildlife and people.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
72	B	3/5/2026	Davi, Vincent	The City should continue investing in parks so they are safe, clean, and welcoming places for the community.	See **Section 4.3** Theme response: "Parks, libraries, and public spaces."
72	C	3/5/2026	Davi, Vincent	Neighborhoods should have well-maintained streets, lighting, and safe public spaces for promoting community.	See **Section 4.3** Theme response: "Parks, libraries, and public spaces."
72	D	3/5/2026	Davi, Vincent	Libraries are important for community services, including internet, education, and destinations for families/young people.	See **Section 4.3** Theme response: "Parks, libraries, and public spaces."
72	E	3/5/2026	Davi, Vincent	The City should continue supporting small business to promote unique neighborhoods and strong local economy.	Comment noted. The action alternatives including the Preferred Alternative address opportunities for neighborhood commercial and mixed use hubs and corridors that accommodate small businesses. The Draft Comprehensive Plan includes policies such as DP-2.18, Avoid Displacement; EP-1.2, Economic Development Progress; EP-3.14, Support Local; and EP-3.2, Economic Diversity.
72	F	3/5/2026	Davi, Vincent	Expanding public transit, improving walking and biking options, and maintaining our roads should be prioritized for safety and mobility.	See **Section 4.3** Theme response: "Transit and infrastructure."
72	G	3/5/2026	Davi, Vincent	Affordable and supportive housing is important for ensuring people have stable and safe places to live.	See **Section 4.3** Theme response: "Affordable housing."
72	H	3/5/2026	Davi, Vincent	Growth should focus on strengthening existing neighborhoods rather than expanding outward in ways that strain infrastructure and natural areas.	See **Section 4.3** Theme response: "Infill."

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73	A	2/18/2026	Davis, Jodie	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
73	B	2/18/2026	Davis, Jodie	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
73	C	2/18/2026	Davis, Jodie	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
73	D	2/18/2026	Davis, Jodie	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
74	A	2/18/2026	Diko, Timothy	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
74	B	2/18/2026	Diko, Timothy	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
74	C	2/18/2026	Diko, Timothy	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
74	D	2/18/2026	Diko, Timothy	urges 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.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
				Supports sensible urban growth that protects the natural environment.	
75	A	2/18/2026	Drobny, Julie	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
75	B	2/18/2026	Drobny, Julie	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
75	C	2/18/2026	Drobny, Julie	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
75	D	2/18/2026	Drobny, Julie	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
76	A	2/17/2026	Edmondson, John	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
76	B	2/17/2026	Edmondson, John	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	Chapters 17E.010 through 070 of the Critical Areas Ordinance authorize penalties for violations of the Critical Areas ordinance, which are enforceable under Spokane Municipal Code Chapter 01.05, Civil Infraction System.
76	C	2/17/2026	Edmondson, John	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
76	D	2/17/2026	Edmondson, John	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
76	E	2/17/2026	Edmondson, John	Would like the city to prioritize: Planting edible plants, native edible plants whenever possible, using regenerative practices to reduce chemicals, improve health of soil, and increase nutrition of produce.	Comment noted. The action alternatives including the Preferred Alternative include new policies addressing native plants and urban agriculture. The draft Comprehensive Plan (August 2026) includes related policies, such as DP-3.8, Access to Nature and Food Security and CH-9.10, Agricultural Tools and Practices.
77	A	2/18/2026	Edwards, Karen	Urges need for bird, insect, and animal habitat corridors throughout the city.	**Section 3.3.3** discusses existing regulations; additional features to be incorporated into the Comprehensive Plan update, and further voluntary actions that would minimize impacts on wildlife and habitat connectivity. Your concern about the need for habitat corridors will be forwarded to decision-makers who are preparing the 2026 Comprehensive Plan Periodic Update.
77	B	2/18/2026	Edwards, Karen	Emphasizes mental health benefits of public access to green spaces.	Comment noted. The EIS addresses parks and recreation services in **Section 3.8**. The Draft Comprehensive Plan includes many policies related to access to green spaces, such as GS-1.7, Parks and Open Spaces and CH-1.7, Equitable Investments for Community Resilience. See: https://my.spokanecity.org/planspokane/chapter-review/.
77	C	2/18/2026	Edwards, Karen	Urges reduced impervious space and increasing tree canopy in order to protect wildlife habitat and the aquifer.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
77	D	2/18/2026	Edwards, Karen	Opposes elimination of environmental review.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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78	A	2/24/2026	Ellis, Carol	Prefers Alternative 2 due to housing focus on transit corridors and not downtown. Concern that lack of federal incentives and high cost of land/housing downtown will not accommodate low-income people.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and includes moderate-high density housing near major transit lines and within areas with planned capacity. This includes downtown as well as other areas distributed throughout the city.
78	B	2/24/2026	Ellis, Carol	Request that conversion of unoccupied office spaces downtown be converted to middle income housing and incorporated into Alternative 2.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing and mixed use growth in urban hubs and corridors including Downtown. The Draft Comprehensive Plan includes policies in support of adaptive reuse, such as DP-2.17, Affordable Housing; DP-3.3, Community Resiliency; DP-3.2, Accessible Housing for All Incomes; CF-1.4, Adaptive Reuse; and N-2.4, Neighborhood Improvement. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
79	A	3/5/2026	Erickson, Leah	Prefers Alternative 2 for the transportation portion of the plan but also prefers the job creation from Alternative 3. General preference for Alternative 2.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity. The Preferred Alternative assumes the same jobs projection as Alternative 1, which had a moderate number of jobs in comparison to Alternatives 2 and 3.
79	B	3/5/2026	Erickson, Leah	Prefers green spaces and parks in the City remain free for community use.	See **Section 4.3** Theme response: "Parks, libraries, and public spaces."
79	C	3/5/2026	Erickson, Leah	Top concerns are Water Use, Transportation Plans, and Pollution Of All Kinds. Also concerned about Affordable Housing and Land Use.	Comment noted. The Final EIS discusses these topics for the Preferred Alternative.

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80	A	2/18/2026	Ferguson, Catherine	Prefers Alternative 3 due to greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity.
80	B	2/18/2026	Ferguson, Catherine	Prefers Alternative 3 conditioned on adequate evaluation of environmental impacts from EIS and Comp Plan	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3. The Final EIS includes analysis of impacts of the Preferred Alternative.
80	C	2/18/2026	Ferguson, Catherine	Recommends clear guardrails before broadly applying environmental review exemption.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
80	D	2/18/2026	Ferguson, Catherine	Recommends inventory of the city's tree canopy, habitat, ecological connectivity, environmental resources.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
80	E	2/18/2026	Ferguson, Catherine	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
81	A	2/16/2026	Firstwater, Francesca	Concern over increased traffic congestion and safety hazards from apartment development near Euclid Hill and Cora.	The City applies plans and zoning in place at the time of development applications to meet levels of service and site design. Please see updated policies regarding Neighborhoods, Transportation, and Other. The City is developing updated regulations to improve its code such as landscaping, called BUILDSpokane.
81	B	2/16/2026	Firstwater, Francesca	Expresses preference for development of empty lots on Division and more mixed neighborhood development like South Perry and North Monroe rather than increase of rental units in the Euclid Hill and Cora neighborhood.	The Preferred Alternative blends Alternatives 2 and 3 and increases opportunities for mixed use development throughout the city. The Draft Comprehensive Plan includes policies to support mixed-use development and outlines the urban hub growth strategy, which establishes mixed-use areas with higher

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					intensity and standards for walkability and bikeability. See Chapter 3 – Growth Strategy. The Draft Comprehensive Plan also includes policies in support of homeownership, such as H-2.3, Homeownership; H-4, Affordable Housing; and H-4.7, Community Ownership Models. See https://my.spokanecity.org/planspokane/chapter-review/.
82	A	2/18/2026	Flint, Chantelle	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
82	B	2/18/2026	Flint, Chantelle	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
82	C	2/18/2026	Flint, Chantelle	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
82	D	2/18/2026	Flint, Chantelle	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
83	A	2/15/2026	Flowers, Robert	Preference for Alternative 3 due to efficient use of public funds, dense development, and improved public transit.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
83	B	2/15/2026	Flowers, Robert	Concern over increased traffic congestion and pollution unless significant reworking of roadway access, transit facilities, and ridership are improved. Indication that light rail would increase public transit appeal.	See **Section 4.3** Theme response: "Transit and infrastructure."

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83	C	2/15/2026	Flowers, Robert	Recommends high density housing downtown with supporting businesses and transit.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity, including downtown.
83	D	2/15/2026	Flowers, Robert	Concern for neighborhood impacts, recommends against high density in existing neighborhoods and recommends for involving neighborhoods in discussions on change.	Comment noted. See **Section 4.3** Theme responses: "Infill" and "Role of Neighborhood Councils."
83	E	2/15/2026	Flowers, Robert	Require developers to complete improvements such as sidewalks.	Comment noted. Comments on policies are outside of the scope of the environmental analysis. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
84	A	2/16/2026	Fougere, Merry	Recommends an inventory and protection of trees, natural areas, and wildlife habitat.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
84	B	2/16/2026	Fougere, Merry	Supports an enforceable critical areas ordinance for protection of critical areas, trees, habitat, water quality, etc. References unprotected natural lands shown in exhibit 3.3-3 "below" but did not include an exhibit - Hollis sent a follow up email requesting the source for the exhibit.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
84	C	2/16/2026	Fougere, Merry	Opposes blanket environmental review exemption, to protect wetlands, forests, habitat, and riparian areas within neighborhoods. References exhibit 7 "below" but did not include an exhibit - Hollis sent a follow up email requesting the source for the exhibit.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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84	D	2/16/2026	Fougere, Merry	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
85	A	2/17/2026	Frank, Jim	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.	The action alternatives consider a range of mixed use opportunities in hubs and corridors. The alternatives allow a range of housing types – single unit and multiunit as described in **Chapter 2** of the EIS. Cost structure is not a required EIS topic. See WAC 197-11-448 and 450.
85	B	2/17/2026	Frank, Jim	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.	Economic analysis is not a required topic per WAC 197-11-448 and 450. The relationship of housing types to affordability levels is part of the Commerce housing element guidebooks. See: https://deptofcommerce.app.box.com/s/1d9d5l7g509r389f0mjpowh8isjpirlh.
85	C	2/17/2026	Frank, Jim	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.	See Response to Comment 85-B.
85	D	2/17/2026	Frank, Jim	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.	See Response to Comment 85-A and -B.

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85	E	2/17/2026	Frank, Jim	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.	The City is required to provide capacity at a range of housing income levels and housing types; there is sufficient capacity for housing at higher incomes, usually single-unit. Housing ownership is also possible with townhomes allowed through residential zones and by each studied alternative based on the City's middle housing zoning efforts. A majority of the City's housing stock will continue to be single-unit per EIS **Chapter 2**.
85	F	2/17/2026	Frank, Jim	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.	The alternatives were developed through a public scoping process described in EIS **Chapter 2** and appendices. The Plan Commission held a public hearing and City Council considered public comment in developing a Preferred Alternative. The action alternatives allow for neighborhood commercial with criteria and also extend mixed use in hubs and corridors. See also Response to Comment Theme 4 regarding neighborhood commercial. The commenter is encouraged to provide comments about desired future land use and zoning to the City through comment periods and hearings for the PlanSpokane 2046 and BUILDSpokane efforts. See the project website: https://my.spokanecity.org/planspokane/.
85	G	2/17/2026	Frank, Jim	The Draft EIS does not analyze whether distributed neighborhood mixed-use zoning could achieve comparable or superior VMT reductions relative to corridor-focused density.	In line with the state of the practice, the EIS evaluates the effects of the proposed land use changes as compared to the No Action alternative. The VMT analysis does not isolate specific elements of the land use alternatives. The Draft Comprehensive Plan does include policies that support neighborhood-serving commercial uses within walking distance of homes.

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85	H	2/17/2026	Frank, Jim	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.	See Response to Comment 85-F.
85	I	2/17/2026	Frank, Jim	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	Costs, subsidies, tenure modeling and similar are not required EIS topics. See WAC 197-11-448 and 450.
85	J	2/17/2026	Frank, Jim	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.	See Responses 85-B and F.
85	K	2/17/2026	Frank, Jim	Describes assumptions used to estimate costs of construction.	Construction costs and similar are not required EIS topics. See WAC 197-11-448 and 450.

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85	L	2/17/2026	Frank, Jim	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 EIS should be modified to reflect the proper housing allocation as approved by the Board of County Commissioners.	**Chapter 2** of the EIS addresses growth targets that are regionally set. The housing allocation is consistent with regional growth target allocations. See Appendix 5 of the Draft Comprehensive Plan (https://my.spokanecity.org/planspokane/chapter-review/) which incorporates the County target approvals.
85	M	2/17/2026	Frank, Jim	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.	See Response to Comment 85-B.
85	N	2/17/2026	Frank, Jim	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.	See Response to Comment 85-B.
85	O	2/17/2026	Frank, Jim	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.	See Response to Comment 85-B. The City's land capacity analysis for the current plan shows much of the City's capacity is on vacant land, particularly single unit and middle housing.

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85	P	2/17/2026	Frank, Jim	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.	See **Chapter 2** for a maps of growth (hexagon maps) and **Chapter 6 Appendix B** for maps with TAZ distribution. Growth is assumed across the city as well as in hubs and corridors. Much single-unit and middle housing is planned in the northwest and southwest on vacant land as well as on corridors and hubs (e.g., Downtown).
85	Q	2/17/2026	Frank, Jim	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.	EIS **Sections 3.5** and **3.6** provide an analysis of housing and consistency with state, regional, and local plans and policies.
85	R	2/17/2026	Frank, Jim	Comments on Spokane County land capacity analysis.	Spokane County is responsible for land capacity analysis in its unincorporated areas. The City of Spokane has prepared its land capacity analysis for city limits. Both County and City need to meet GMA requirements for planning including required and recommended steps for preparing land capacity and housing evaluations (RCW 36.70a and WAC 365-196).

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85	S	2/17/2026	Frank, Jim	Comments on CPPs and modification of the urban growth boundary.	Spokane County is responsible for planning in UGAs.
85	T	2/17/2026	Frank, Jim	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.	The City developed its middle housing approach through the Building Opportunity for Housing program and allows middle housing extensively in residential zones. The City has prepared a Draft Housing Element including identifying barriers to achieving housing at all income levels and making adequate provisions to meet housing targets and remove barriers such as through code changes; see BUILDSpokane. Draft Elements and other information about code changes are available at https://my.spokanecity.org/planspokane/.
85	U	2/17/2026	Frank, Jim	Slide deck about small lots and townhomes as an option for low income bands.	Comment noted. Also see Response to Comment 85-B.

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85	V	2/17/2026	Frank, Jim	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.	The City developed a land capacity analysis based on best practices and held a hearing in March 2025. See https://my.spokanecity.org/planspokane/housing-needs/land-capacity-analysis/. The City will monitor its plan and progress in meeting housing targets and can adaptively management its approach (RCW 36.70a.130(9). See Chapter 2 Community Monitoring of the Draft Comprehensive Plan: https://my.spokanecity.org/planspokane/chapter-review/.
86	A	3/5/2026	Gilbert, Morna	Concern that the plan is a waste of time and resources, and that it doesn't focus on common sense community needs.	Comment noted. Community engagement for the Comprehensive Plan Periodic Update identified policy gaps based on community needs and wants. Draft policies incorporate these engagement findings.
86	B	3/5/2026	Gilbert, Morna	Concern that streets are not in good condition.	The City supports prioritizing maintenance of what is already built, as described through Policy TR-8.2.

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86	C	3/5/2026	Gilbert, Morna	Concern that there are so many people experiencing homelessness in Spokane.	Comment noted. Action alternatives including the Preferred Alternative are intended to address housing needs including permanent and emergency housing targets as described in **Section 3.5**. The Draft Comprehensive Plan includes policy CH-6.3, Supporting Unhoused and Unstably Housed Neighbors. See: https://my.spokanecity.org/planspokane/chapter-review/. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
86	D	3/5/2026	Gilbert, Morna	Concern that the long term future of the City of Spokane is undercut because of short-sighted ideologies.	The City has developed the periodic update considering GMA requirements, studies and evaluation, and extensive opportunities for public input. Once adopted, the Plan will continue to be monitored every 5 years and updated every 10 years. (RCW 36.70a.130) The City can adapt to changing trends and needs over time.
87	A	2/17/2026	Gill, Anthony	Concern that Alternative 2 & 3 distribute too little housing growth in areas like Manito, Lincoln Heights, Comstock, and Southgate. The focus on Downtown and Hillyard - areas with historic high environmental and economic burdens - may not adequately comply with HB 1220.	The Preferred Alternative evaluated in the Final EIS distributes more growth relative to South Spokane than other action alternatives while still supporting key hubs. The City has developed policies to address compatibility and reduce exposure to air quality and noise and other burdens. This includes Climate related policies to address climate and environmental justice. See Draft Chapters at: https://my.spokanecity.org/planspokane/chapter-review/ See also **Section 4.3** Theme response: "Support for streamlined environmental review."
87	B	2/17/2026	Gill, Anthony	Please ensure plan for sufficient housing and commercial opportunities in legacy R1 neighborhoods.	See **Section 4.3** Theme responses: "Mixed use development" and "Infill." The Preferred Alternative is designed to meet the City's housing growth targets.

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87	C	2/17/2026	Gill, Anthony	High-traffic, high-noise areas carry high environmental burdens and can take a toll on human health and increases risk of injury due to traffic. Focus on growth should not be isolated to these areas (as in Centers and Corridors strategy).	Compatibility of growth and air pollution and noise are addressed in **Sections 3.2** and **3.4** of the EIS. Please also see draft policies meant to address the growth strategy, natural environment, community health, and others: https://my.spokanecity.org/planspokane/chapter-review/.
87	D	2/17/2026	Gill, Anthony	There is significant demand for retail opportunities in legacy R1 neighborhoods. Please allow this type of development in legacy R1 zones.	See **Section 4.3** Theme response: "Mixed use and development."
87	E	2/17/2026	Gill, Anthony	Please ensure the adopted growth strategy plans for the higher job growth target of 38,848 new jobs by 2046. Critical need for high-wage jobs in industries other than healthcare, education, and government. Ensure growth targets and land allocations accommodate increased opportunity for local residents.	Comment noted. The Preferred Alternative assumes the same job growth studied under Alternative 1. This is the mid-range number in the context of Alternatives 2 and 3. This is to ensure the City's planning is aligned with regional planning based on Spokane Regional Transportation Council (SRTC) modeling, which uses the Alternative 1 job growth numbers.
87	F	2/17/2026	Gill, Anthony	Please adopt the maximum possible SEPA exemption for infill development allowed by state law to promote development where environmental impacts are unlikely. The City should adopt the maximum exemption allowed under the statute— 200 units of multifamily development or 65,000 sf of commercial development.	Comment noted. See **Section 4.3** Theme response: "Support for streamlined environmental review."
87	G	2/17/2026	Gill, Anthony	Please ensure the Final EIS and adopted Comprehensive Plan sufficiently plan for greenhouse gas emissions reductions as	Comment noted. See EIS **Sections 3.2 and 3.7** of the EIS addressing GHG and VMT. The Draft Comprehensive Plan includes related policies, such as GS-6.2, Vehicle Miles Traveled

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				required under HB 1181. Recommends policy aimed at reducing VMT through investments in the transportation system, policy aimed at incentivizing mode shift toward walking, biking, and transit. Need backed up by project-level decisions and capital plans.	Reduction; TR-9, Achieve Climate Goals; and TR-9.8, Distribution and Delivery.
88	A	2/17/2026	Glanz-Kreutz, Crystal	Prefers Alternative 3 on the condition that cumulative environmental impacts are adequately evaluated, avoided, and mitigated, by the EIS and Comprehensive Plan.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3. The Final EIS includes analysis of impacts of the Preferred Alternative and mitigation measures.
88	B	2/17/2026	Glanz-Kreutz, Crystal	Prefers Alternative 3 due to greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity.
88	C	2/17/2026	Glanz-Kreutz, Crystal	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
88	D	2/17/2026	Glanz-Kreutz, Crystal	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
89	A	2/18/2026	Gobel, Sylvia	Recommends protecting green space and trees by increasing density. Emphasizes value of not having to drive to find nature.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
90	A	2/18/2026	Goldschlag, Daya	Opposes elimination of environmental review in order to protect natural lands and wildlife habitats.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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91	A	3/5/2026	Gordon, Scott	Concern that Spokane is not doing what it needs to regarding environmental concerns.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
91	B	3/5/2026	Gordon, Scott	Concern over pollution from modified exhaust, toxic fluids from at home car maintenance, dog defecation, and noise pollution.	Air pollution is addressed in EIS **Section 3.2** and noise in **Section 3.4**. The City regulates stormwater and water quality as described in EIS **Section 3.1**.
91	C	3/5/2026	Gordon, Scott	Interest in being on the Climate Resiliency and Sustainability Board.	Comment noted. Please see https://my.spokanecity.org/bcc/boards/climate-resilience-and-sustainability-board/ for more information and contact details for the Climate Resiliency and Sustainability Board.
92	A	3/5/2026	Gulick, Leah	Urges aiding at-risk communities and sustainably developing the city to meet current and future needs.	Comment noted. The City is developing the periodic update to meet GMA requirements for housing at all income levels and emergency housing, as well as new policies addressing resilience and sustainability with the Climate policies. Please also see responses to letter 87.
92	B	3/5/2026	Gulick, Leah	Urges updated land use code to include preserved or park areas across all alternatives.	Comment noted. Comments on policies are outside of the scope of the environmental analysis. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers. All alternatives would continue to apply the City's Parks and Natural Lands Master Plan, which plans for the future park system.
92	C	3/5/2026	Gulick, Leah	Urges use of acreage for public/open space in all zones, and updating goals of the Centers and Corridors Study to include minimum greenspace requirements.	See **Section 4.3** Theme response: "Parks, libraries, and public spaces."

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92	D	3/5/2026	Gulick, Leah	Alternative 2 or 3 should implement restoration into land use planning, with the goal of providing ecosystem services to nearby residents or visitors. Includes specific open gravel plots near Clark Fork Restaurant, and near Kendall Yards. Empty land would better serve residents and environment if restored.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review." **Section 3.3.3** of the Draft EIS lists a number of features to be incorporated into the Comprehensive Plan Update as well as additional mitigation opportunities that emphasize the restoration of shoreline and terrestrial habitat, the development of incentive programs to encourage habitat restoration and tree canopy expansion, and the acquisition of additional undeveloped land in key areas to designate for parks and natural lands.
92	E	3/5/2026	Gulick, Leah	Concerned over the negative environmental implications of Alternative 3. Particularly concentrations of noise pollution, traffic pollution, smog, etc. in already busy areas like downtown.	See Response to Comment 87-C.
92	F	3/5/2026	Gulick, Leah	Concerned over the negative environmental implications of Alternative 3. Particularly, concentrations of pollution from industrial activities in NE Spokane and the West Plains.	See Response to Comment 87-C.
92	G	3/5/2026	Gulick, Leah	Concern over Urban Heat Island effect of concentrating growth in the city center.	Comment noted. Final EIS **Section 3.4.2** discusses environmental justice impacts including related to urban heat island effects. The Preferred Alternative is a blend of Alternatives 2 and 3. The Draft EIS found that Alternatives 2 and 3 may place more growth in areas with existing heat islands, however, they also create opportunities to increase landscaping, tree canopy, and shade with new development. The Preferred Alternative also includes a Climate Element, with policies related to heat resilience.

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92	H	3/5/2026	Gulick, Leah	Considers Alternative 2 as having less environmental impact due to services around neighborhood centers, increased walkability, decreased commuter GHG emissions.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity. The Preferred Alternative would also increase opportunities for services, walkability, and transportation emissions reduction.
92	I	3/5/2026	Gulick, Leah	Considers Alternative 2 as having greater potential to increase development that meets neighborhood needs. Stresses need for height limit change, mixed-use, high-density housing, and infrastructure in local areas - especially important around Division Corridor.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and includes moderate-high density housing near major transit lines, including along Division, and within areas with planned capacity. Code updates will accompany the adopted comprehensive plan and changes to height limits and other regulations that implement the plan will be considered by the Plan Commission and City Council.
92	J	3/5/2026	Gulick, Leah	Emphasizes the value of the Garland District as a good example of mixed-use, safe streets, and tree canopy.	Comment noted. The Draft Comprehensive Plan includes policies that support mixed uses, safe streets, and tree canopy.
93	A	2/18/2026	Hall, Jennifer	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
93	B	2/18/2026	Hall, Jennifer	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
93	C	2/18/2026	Hall, Jennifer	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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93	D	2/18/2026	Hall, Jennifer	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
94	A	1/20/2026	Haller, Justin	Concern that double deck buses are not a good idea.	Comment noted. Suggestions for future planning are outside of the scope of the environmental analysis. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
94	B	1/20/2026	Haller, Justin	Concern that two way bike lane on Spokane Falls Blvd is not a good idea.	Comment noted. Additional details for this project can be found at https://my.spokanecity.org/projects/spokane-falls-boulevard-planning-study/. Suggestions for future planning are outside of the scope of the environmental analysis. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
94	C	1/20/2026	Haller, Justin	Statement that there is no climate change; otherwise, people would buy beachfront property.	Comment noted and forwarded to City decision-makers. The City is adhering to HB 1181 to address Climate planning.
95	A	3/5/2026	Hancock, John	Because aquifer/groundwater flow is not limited by urban boundaries, the EIS Topics "Earth, water quality, and water resources" and "Relationship to plans, policies, and regulations" and "Utilities" must be updated to address PFAS in the West Plains.	See **Section 4.3**, Theme 9: Water.
95	B	3/5/2026	Hancock, John	Concern that the word "health" is not in the report and that the plan does not appear to "describe the potential environmental impacts, reasonable alternatives, and ways to avoid or	A word search of the Draft EIS indicates that health is referenced 174 times. Issues such as health disparities (**Section 31**.), water quality (**Section 3.1**), air quality (**Section 3.2**), noise (**Section 3.4**), access to green space (**Section 3.7**), etc. are considered in relation to community health.

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				minimize negative impacts of policies" as it should.	
95	C	3/5/2026	Hancock, John	Urges Plan effort pause until PFAS is addressed. Concerned that an approved plan without acknowledging PFAS in the West Plains will slow the response to groundwater and surface water contamination from "forever chemicals."	See **Section 4.3**, Theme 9: Water.
96	A	2/18/2026	Hansold, Ted	An environmental review exemption for developments should be allowed only if >66% of the area is disturbed or impervious.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
96	B	2/18/2026	Hansold, Ted	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.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
96	C	2/18/2026	Hansold, Ted	When development will result in removal of existing trees, require payment to Urban Forestry for planting projects.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
96	D	2/18/2026	Hansold, Ted	Emphasis on infilling areas that are already 33% impervious or 66% disturbed.	See **Section 4.3** Theme response: "Infill."
97	A	2/19/2026	Harryman, Darla	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
97	B	2/19/2026	Harryman, Darla	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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97	C	2/19/2026	Harryman, Darla	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
97	D	2/19/2026	Harryman, Darla	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
98	A	3/5/2026	Haught, Lunell	Concern that there will be a net loss of habitat, natural areas, and parks in exchange for accommodating housing. Believes this to be shortsighted and warns against warehousing people.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
98	B	3/5/2026	Haught, Lunell	Concern that environmental review exemption will sacrifice quality of life for Spokane.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
99	A	3/5/2026	Hawk, Jonas	Emphasizes need for development opportunities for less environmental impact and more community. Specifically dense, off-grid, simple, affordable, village-style pocket neighborhoods.	Comment noted. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers. The draft Comprehensive Plan includes a related policy: H-2.2, Creative Housing Options.
100	A	2/18/2026	Hermrmann, Lesley	Ensure infill and redevelopment projects are designed to be compatible with surrounding uses and building types - specifically large multi-family housing should stay out of neighborhoods and should stay in centers and corridors.	See **Section 4.3** Theme response: "Infill."

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100	B	2/18/2026	Hermrmann, Lesley	Requests height limits not be raised.	Comment noted. Comments on policies are outside of the scope of the environmental analysis. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
100	C	2/18/2026	Hermrmann, Lesley	Recommends minimum tree planting requirement for new development. Recommends working with the urban forestry program director at the Lands Council.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
100	D	2/18/2026	Hermrmann, Lesley	Opposes any removal/waiver of SEPA environmental review.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
100	E	2/18/2026	Hermrmann, Lesley	Draws connections between vacant commercial space and high residential rents.	Comment noted. The Preferred Alternative includes compliance with State requirements, and the City is addressing code updates in BUILDSpokane through which recent state laws would be addressed. This includes SB 6026, which limits mandatory ground-floor retail requirements. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
100	F	2/18/2026	Hermrmann, Lesley	Concern that building too many multi-family homes reduces ability for citizens to own their homes. Also considers too many apartment homes burden on roadways, describes the benefits of high density as having a point of diminishing returns that we should avoid.	The action alternatives including the Preferred Alternative include opportunities for single-unit and middle housing that provides housing ownership opportunities as well as multi-unit housing that provides opportunities for rental housing. This is meant to support the development of a Housing Element that meets GMA requirements. (RCW 36.70a.070). See the Draft Housing Element at: https://my.spokanecity.org/planspokane/chapter-review/.
100	G	2/18/2026	Hermrmann, Lesley	Concern that large construction companies/corporations (e.g., Amazon) are/will	The City is preparing its periodic update in compliance with the Growth Management Act. The City is to plan for its share of growth in housing and economic development but also to

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				receive unfair tax breaks in exchange for growth.	protect the environment. See other purposes at RCW 36.70a.010 and goals at RCW 36.70a.020.
100	H	2/18/2026	Hermrmann, Lesley	Includes a table with recommended allowed uses/locations for the 9 Land Use designations. Includes concerns for tree coverage, homeownership, mixed-use, height limits, open space, compatibility, infrastructure.	The comment is noted and forwarded to City decision-makers. Please see the project website for the City's efforts on land use plan and code updates and additional opportunities for public comment: https://my.spokanecity.org/planspokane/.
101	A	2/18/2026	Hieb, Carlee	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
101	B	2/18/2026	Hieb, Carlee	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
101	C	2/18/2026	Hieb, Carlee	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
101	D	2/18/2026	Hieb, Carlee	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
102	A	2/16/2026	Hiles, Henry	Supports reducing VMTs, uplifting public transit and non-emitting modes of transport between neighborhoods and around the urban core. Specifically calls for greater bus and bike lane infrastructure outside of downtown.	See **Section 4.3** Theme response: "Transit and infrastructure."

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102	B	2/16/2026	Hiles, Henry	Describes holes in bus and bike connectivity between neighborhoods, specifically the University District, Downtown, Browne's Addition, West Central, and Cliff Cannon. Discusses specific examples of trip routes and lack of bike infrastructure.	Concerns regarding specific locations lacking infrastructure will be shared with decisionmakers for future transportation planning.
103	A	2/18/2026	Honebein, Karli	Prefers Alternative 3 due to greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity.
103	B	2/18/2026	Honebein, Karli	Prefers Alternative 3 conditioned on adequate evaluation of environmental impacts from EIS and Comp Plan	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
103	C	2/18/2026	Honebein, Karli	Recommends clear guardrails before broadly applying environmental review exemption.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
103	D	2/18/2026	Honebein, Karli	Recommends inventory of the city's tree canopy, habitat, ecological connectivity, environmental resources.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
103	E	2/18/2026	Honebein, Karli	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
104	A	2/18/2026	Hughes, MK	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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104	B	2/18/2026	Hughes, MK	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
104	C	2/18/2026	Hughes, MK	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
104	D	2/18/2026	Hughes, MK	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
105	A	12/24/2025	Hughes, Ryan	Comment #1. Request for zone change consideration on a specific property near W 15th Ave and S Lincoln St.	The comment is noted and forwarded to City decision-makers. For additional opportunities to comment on the future land use plan and code updates, please see: https://my.spokanecity.org/planspokane/.
105	B	12/24/2025	Hughes, Ryan	Note #1. Comment on potential walkability, neighborhood scale, and the compatibility of a mixed-use zoning designation with the City's current comp plan.	See **Section 4.3** Theme response: "Mixed use and development."
105	C	12/24/2025	Hughes, Ryan	Comment #2. Support for Draft EIS Alternative #3's intent to urbanize community throughout, while expressing concern on limitations.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3. It includes increased mixed-use and commercial uses throughout the city.
105	D	12/24/2025	Hughes, Ryan	Note #2. General support for proposed zoning designations, particularly Residential Low/High, with discussion on benefits of mixed-use neighborhoods.	See **Section 4.3** Theme response: "Mixed use and development."

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106	A	3/5/2026	Jennifer	Concern that neighborhood councils have been excluded, and that developer concerns are being considered over resident concerns.	See **Section 4.3** Theme response: "Neighborhood Councils." Neighborhood Councils were directly contacted about workshops and the DEIS comment period and were notified along with agencies during notification processes. The City is required by the Growth Management Act to accommodate housing growth targets for all income bands. This entails setting land use designations that allow for an adequate number of units to be developed, particularly low-rise multifamily, which is most likely to be affordable to lower income bands. Alternatives 2 and 3 and the Preferred Alternative reflect this requirement. The Preferred Alternative focuses housing growth near transit and in areas with planned capacity.
106	B	3/5/2026	Jennifer	Concern that Environmental Review Exemption will only benefit developers building homes for higher income individuals and will not benefit low-income residents.	See **Section 4.3** Theme responses: "Tree canopy and habitat / concern about environmental review" and "Affordable housing." Housing affordability is a key topic in the Comprehensive Plan. The City is required to remove barriers to housing affordability and policies in the Draft Comprehensive Plan Housing Element reflect this requirement.
106	C	3/5/2026	Jennifer	Recommends an inventory and protection of trees, natural areas, and wildlife habitat.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
106	D	3/5/2026	Jennifer	Supports an enforceable critical areas ordinance for protection of critical areas, trees, habitat, water quality, etc. References unprotected natural lands shown in exhibit 3.3-3 "below" but did not include an exhibit - Hollis sent a follow up email requesting the source for the exhibit.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
106	E	3/5/2026	Jennifer	Opposes blanket environmental review exemption, to protect wetlands, forests, habitat,	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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				and riparian areas within neighborhoods. References exhibit 7 "below" but did not include an exhibit - Hollis sent a follow up email requesting the source for the exhibit.	
106	F	3/5/2026	Jennifer	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
107	A	2/27/2026	Joeschke, Heather	Concern that Environmental Review Exemption will only benefit developers building homes for higher income individuals and will not benefit low-income residents.	See **Section 4.3** Theme responses: "Tree canopy and habitat / concern about environmental review" and "Affordable housing." Housing affordability is a key topic in the Comprehensive Plan. The City is required to remove barriers to housing affordability and policies in the Draft Comprehensive Plan Housing Element reflect this requirement.
107	B	2/27/2026	Joeschke, Heather	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
107	C	2/27/2026	Joeschke, Heather	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
107	D	2/27/2026	Joeschke, Heather	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
107	E	2/27/2026	Joeschke, Heather	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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108	A	2/16/2026	Johnson, Nicholas	Supports Alternative 3 due to higher density focus on city center.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
108	B	2/16/2026	Johnson, Nicholas	Supports Alternative 3 as strongest option from climate and land use perspective.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
108	C	2/16/2026	Johnson, Nicholas	Prefers Alternative 3 due to support of public transit use, increased ridership, reduced VMTs, reduced CO2 emission and other pollutants.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
108	D	2/16/2026	Johnson, Nicholas	Prefers Alternative 3 due to efficient land use, reduced pressure for sprawl and deforestation.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
108	E	2/16/2026	Johnson, Nicholas	Prefers Alternative 3 due to efficient water use by reducing demand for large lots per household.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
109	A	2/17/2026	Jones, Theresa	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
109	B	2/17/2026	Jones, Theresa	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
109	C	2/17/2026	Jones, Theresa	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
109	D	2/17/2026	Jones, Theresa	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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109	E	2/17/2026	Jones, Theresa	Opposes hotel sized homes being built on greenspaces.	Comment noted. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
110	A	2/17/2026	Jurado, Hannah	Development should be done in a manner that prioritizes the protection of crucial habitat for wildlife. Should maintain undeveloped areas for wildlife and recreation. Concern that none of the alternatives adequately assess environmental impacts due to increased development.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
110	B	2/17/2026	Jurado, Hannah	All alternatives have the potential to impact wildlife and fish habitats (Draft EIS pg. 3-70). Concern over growth consequences, particularly from Alternative 2 which appears to have the most development area.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
110	C	2/17/2026	Jurado, Hannah	Development should account for environmental justice concerns tied to plants and animals. Development should also address increasing tree cover.	Comment noted. The EIS considers tree canopy coverage and environmental justice in **Section 3.3.2** Plants and Animals. The Draft Comprehensive Plan includes draft policies related to environmental justice and tree cover, such as GS-7.1, Climate Considerations and GS-7.9 Tree Canopy. The Environmental Justice Memo also outlines potential future actions (See my.spokanecity.org/planspokane/climate-planning). Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
111	A	2/18/2026	Kazura, Eileen	Concern that the EIS does not meaningfully incorporate neighborhood councils or community assembly in decision-making framework. EIS references outdated or nonexistent neighborhood action plans.	See **Section 4.3** Theme response: "Neighborhood councils."

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111	B	2/18/2026	Kazura, Eileen	Concern over both Alternatives 2 & 3. Request a clear explanation of the mechanism by which these alternatives may be modified, combined, or refined into a single, consensus-based final plan.	Comment noted. Generally, in the EIS process, the Preferred Alternative can be one of the studied alternatives from the Draft EIS or a blend of multiple alternatives. The Preferred Alternative must be within the range of what was studied in the Draft EIS and not introduce new concepts. The Preferred Alternative is a combination of various features of the studied alternatives, based on public input and the Draft EIS evaluation. The Plan Commission voted to approve the draft Preferred Alternative in April 2026 and the City Council approved the draft Preferred Alternative with minor amendments in May 2026 (see RES 2026-0035).
111	C	2/18/2026	Kazura, Eileen	Requests clarification on how land use policy demolition, permitting, and incentives, will offer concrete mechanisms to ensure that new development will meaningfully address the 0–80% AMI housing shortage, rather than generalized growth assumptions.	See **Section 4.3** Theme response: "Affordable housing."
111	D	2/18/2026	Kazura, Eileen	Urge the city to explicitly address demolition impacts, displacement risk, homeownership preservation in both analysis and policy documents.	A planning-level evaluation of supply and displacement is included in the Final EIS in **Section 3.5.2**. Also, see **Exhibit 3.5-44** summarizing a matrix of anti-displacement measures. The Draft Comprehensive Plan (August 2026) includes several policies that address demolition, displacement, and homeownership: • GS-2.3, Displacement Risk • GS-3.1, Addressing Housing Displacement • H-1.5, Expanded Opportunity for Incentives and Funding

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					• H-2.3, Homeownership • H-4.1, Affordability Requirements • H-4.2, Lower-Income Housing Supply • H-7.1, Tenant Displacement • H-7.4, Displacement Monitoring
111	E	2/18/2026	Kazura, Eileen	Broad infill exemptions risk facilitating intensive, uncoordinated development within established single-family neighborhoods. The cumulative impact of these exemptions must be fully disclosed and carefully reconsidered.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
111	F	2/18/2026	Kazura, Eileen	If population increases are anticipated without corresponding transit gains, personal vehicle use will likely rise. Questions: 1) how will additional vehicle demand be accommodated? 2) where will parking occur in areas with reduced requirements? 3) What strategies are in place to meaningfully reduce vehicle-related emissions?	Questions #1 and #2 are addressed through **Section 4.3** themes "Transit and Infrastructure." Regarding question #3, policy TR-9.2, TR-9.3, and TR-9.4 of the August 2026 draft Comprehensive Plan support: evaluating Transportation Demand Management (TDM) strategies to gain efficiency in the transportation system and reduce Vehicle Miles Traveled (VMT), continuing the City's participation and investment in the countywide TDM program, and evaluating expansion of trip reduction requirements.
111	G	2/18/2026	Kazura, Eileen	The "Earth, Water Quality, and Water Resources" section omits reference to the region's aquifer system.	See **Section 4.3** Theme response: "Water."
111	H	2/18/2026	Kazura, Eileen	How will the Plan address attempts to reduce and eliminate environmental considerations, incentives, and regulations at the federal level?	Please see Response to Comment 12-Q.
111	I	2/18/2026	Kazura, Eileen	Current conditions should be the starting point when considering population, housing stock,	The EIS describes baseline conditions in the affected environment for each topic in **Chapter 3**. Please also see

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				family size, environment, home ownership, displacement, etc. Statement should seek to lessen environmental impacts, improve homeownership, minimize displacement.	responses to comments 12-D and Themes 1 and 5 regarding tree canopy and habitat and affordable housing.
111	J	2/18/2026	Kazura, Eileen	Recommend incorporating the best elements of Alternative 2 & 3. As currently presented, Alternatives 2 and 3—combined with expansive infill exemptions— risk negative impacts. The neighborhood would like to engage constructively in further shaping of the plan.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity. See **Section 4.3** Theme responses: "Tree canopy and habitat / concern about environmental review," "Affordable housing," and "Parking."
112	A	2/18/2026	Keller-Mikkelsen, Megan	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
112	B	2/18/2026	Keller-Mikkelsen, Megan	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
112	C	2/18/2026	Keller-Mikkelsen, Megan	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
112	D	2/18/2026	Keller-Mikkelsen, Megan	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
113	A	2/18/2026	Kennedy-Gibbens, Gabriel	Prefers Alternative 3 due to greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.

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113	B	2/18/2026	Kennedy-Gibbens, Gabriel	Opposes blanket environmental review exemption unless the proposed development area is 100% disturbed and impervious.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
114	A	2/18/2026	Khouja, Sahara	Recommends an inventory and protection of trees, natural areas, and wildlife habitat.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
114	B	2/18/2026	Khouja, Sahara	Supports an enforceable critical areas ordinance for protection of critical areas, trees, habitat, water quality, etc. References unprotected natural lands shown in exhibit 3.3-3 "below" but did not include an exhibit - Hollis sent a follow up email requesting the source for the exhibit.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
114	C	2/18/2026	Khouja, Sahara	Opposes blanket environmental review exemption, to protect wetlands, forests, habitat, and riparian areas within neighborhoods. References exhibit 7 "below" but did not include an exhibit - Hollis sent a follow up email requesting the source for the exhibit.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
114	D	2/18/2026	Khouja, Sahara	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
115	A	3/1/2026	Kleinknecht, Jake	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
115	B	3/1/2026	Kleinknecht, Jake	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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115	C	3/1/2026	Kleinknecht, Jake	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
115	D	3/1/2026	Kleinknecht, Jake	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
116	A	2/18/2026	Klingback, Millayna	Prefers Alternative 3 due to greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
116	B	2/18/2026	Klingback, Millayna	Prefers Alternative 3 conditioned on adequate evaluation of environmental impacts from EIS and Comp Plan	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
116	C	2/18/2026	Klingback, Millayna	Recommends clear guardrails to ensure no unmitigated development impact before broadly applying environmental review exemption.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
116	D	2/18/2026	Klingback, Millayna	Recommends inventory of the city's tree canopy, habitat, ecological connectivity, environmental resources.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
116	E	2/18/2026	Klingback, Millayna	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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117	A	2/18/2026	Koedding, Jaime	Recommends an inventory and protection of trees, natural areas, and wildlife habitat.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
117	B	2/18/2026	Koedding, Jaime	Supports an enforceable critical areas ordinance for protection of critical areas, trees, habitat, water quality, etc. References unprotected natural lands shown in exhibit 3.3-3 "below" but did not include an exhibit - Hollis sent a follow up email requesting the source for the exhibit.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
117	C	2/18/2026	Koedding, Jaime	Opposes blanket environmental review exemption, to protect wetlands, forests, habitat, and riparian areas within neighborhoods. References exhibit 7 "below" but did not include an exhibit - Hollis sent a follow up email requesting the source for the exhibit.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
117	D	2/18/2026	Koedding, Jaime	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
118	A	2/18/2026	Lambert, Jeff	Urges more analysis and consultation with neighborhood councils.	See **Section 4.3** Theme response: "Neighborhood councils."
118	B	2/18/2026	Lambert, Jeff	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
118	C	2/18/2026	Lambert, Jeff	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
118	D	2/18/2026	Lambert, Jeff	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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				neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	
118	E	2/18/2026	Lambert, Jeff	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
119	A	3/5/2026	Lambert, Jeff	Concern that there has been insufficient environmental analysis to allow for the environmental review exemption. Also concerned that Washington Dept. of Fish & Wildlife, and the Department of Natural Resources seldom comment and that any comments they do provide will be ignored.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
119	B	3/5/2026	Lambert, Jeff	Concern that exemptions for developments with 20 houses or multifamily units will destroy habitat that should be protected under Code 17E.020.030. Gives Latah Glen Development as an example.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
119	C	3/5/2026	Lambert, Jeff	Concern that state regulations do not address all of the identified critical area types in the City code 17E.020. There is inadequate analysis in the Draft EIS to define how the environmental exemptions will impact the loss of ecological functions from development.	The SEPA exemptions for infill development and housing that are discussed in **Appendix 6.E** would need to demonstrate compliance with applicable federal, state, and local regulations that serve as mitigation for impacts to plants and animals. These regulations and the environmental protections that they mandate are discussed in **Section 3.3.3**. Infill development would still need to abide by these regulations where applicable, regardless of SEPA exemptions. With respect to critical areas, this means that any future development under the infill exemptions would need to demonstrate no net loss of ecological function for any and all potentially affected critical areas types present, as

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					defined in Spokane City Code Sections 17E.010 through 040; 17E.060, and 17E.070.
119	D	3/5/2026	Lambert, Jeff	Concerns that current regulations are not effectively enforced, and without environmental review this will be worsened. Concern that the list of current regulations lack an explanation of how they will be reviewed and enforced without the environmental review exemption.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
119	E	3/5/2026	Lambert, Jeff	Concerned that it is unclear whether each infill exemption phase is a blanket exemption or if Exhibit 4 Existing Hard Surfaces as well as exhibit 3.3-4 showing Natural Resource Designations would affect exemptions.	The referenced maps illustrate current conditions. Per WAC 197-11-800, exemptions do not apply when there are lands covered by water, and certain air quality and water quality conditions or permits per Draft EIS Section 5.2.3. (Final EIS **Section 6.2.3**)
119	F	3/5/2026	Lambert, Jeff	Concern over inadequate quantification of impacts of the exemptions in Alternatives 2 and 3. Concern over the lack of scientific data supporting how natural lands such as the critical areas, forests, wetlands, grasslands, shrub-steppe would be impacted by the exemptions.	This EIS does not authorize or commit resources to a specific future development or developments with a quantifiable impact footprint. Quantification of development impacts and footprint would be undertaken on a project by project basis and is outside the scope of this EIS. Future development would need to abide by the environmental regulations identified in **Section 3.3.3**, implementation of which would minimize impacts to plants and animals. Further, as noted in **Section 3.3.3** under "Incorporated Plan Features," the Comprehensive Plan update will include a Review and update to Spokane's critical areas regulations based on current best available science.
119	G	3/5/2026	Lambert, Jeff	Concern over lack of discussion on how to adequately address environmental impacts.	Each section of the EIS includes mitigation measures meant to address environmental impacts.

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119	H	3/5/2026	Lambert, Jeff	Using 90-100% hard surfaces as the criteria for environmental review exemption is appropriate. Suggests excluding undisturbed areas of 10,000 SF from the exemption. Also suggests using GIS data to determine environmental review exemption based on site conditions instead of geographic location.	Comment noted. Comments on policies are outside of the scope of the environmental analysis. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers. See **Section 4.3** Theme response: "Support for streamlined environmental review."
120	A	2/13/2026	Landa-McVicker, Carol	General support of elements from Alternative 2 & 3, with concerns.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity.
120	B	2/13/2026	Landa-McVicker, Carol	Concern over concentrated development within 1/2 mile of arterials. Recommends reducing distance from arterials where development is focused to reduce impact to established neighborhoods until additional housing is needed. Recommends development of vacant lots first.	Comment noted. The City allows development of vacant lands and lands that redevelop and applies zoning and design standards to address compatibility. The City is developing a future land use plan based on the Preferred Alternative as well as developing code amendments through BUILDSpokane including measures that are meant to address landscaping and other matters. Please see https://my.spokanecity.org/planspokane/ for other opportunities to provide comments.
120	C	2/13/2026	Landa-McVicker, Carol	Concern against sprawl, loss of habitat, affordable housing, and developing without sufficient infrastructure.	See **Section 4.3** Theme responses: "Tree canopy and habitat / concern about environmental review," "Infill," "Affordable housing," and "Transit and infrastructure."
120	D	2/13/2026	Landa-McVicker, Carol	Concern that no parking requirements within 1/2 mile of transit might not result in development of low- and middle-income housing. Concern that the impact to neighborhoods is negative.	See **Section 4.3** Theme responses: "Transit and infrastructure" and "Parking."

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120	E	2/13/2026	Landa-McVicker, Carol	Concern that Spokane's public transportation system cannot support life without a private vehicle, and that the transportation system will not be able to do so for years.	See **Section 4.3** Theme response: "Transit and infrastructure."
120	F	2/13/2026	Landa-McVicker, Carol	Recommends requiring neighborhoods be informed when multi-family developments are proposed in residential neighborhoods.	The comment is noted and forwarded to City decision-makers.
120	G	2/13/2026	Landa-McVicker, Carol	Would like urban forests and wildlife corridors protected and expanded as much as possible, particularly for addressing climate change, air pollution, and water pollution.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
121	A	2/15/2026	Landa-McVicker, Carol	Recommends against allowing development without environmental impact reviews. Emphasizes notifying neighbors prior to approval of infill development regardless of size.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review." As noted in **Appendix 6.E** even with exemptions from SEPA review, infill development would need to demonstrate compliance with other federal, state, and local environmental and development regulations prior to authorization. Opportunities for public notification and comment exist through other environmental permit and development review processes for specific project types, including state and federal wetland permit processes and City land use permit reviews.
121	B	2/15/2026	Landa-McVicker, Carol	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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121	C	2/15/2026	Landa-McVicker, Carol	Recommends a study to determine if infill development is resulting in affordable housing.	See **Section 4.3** Theme response: "Affordable housing."
122	A	2/17/2026	Lane, Katherine	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
122	B	2/17/2026	Lane, Katherine	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
122	C	2/17/2026	Lane, Katherine	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
122	D	2/17/2026	Lane, Katherine	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
123	A	2/18/2026	Little, Bradford & Shannon	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
123	B	2/18/2026	Little, Bradford & Shannon	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
123	C	2/18/2026	Little, Bradford & Shannon	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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				neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	
123	D	2/18/2026	Little, Bradford & Shannon	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
124	A	2/18/2026	Lowe, John	Would like ability to review maps in ArcGIS online and Google Earth. For example, would like to use specific layers to identify locations/opportunities to improve recharge through removal or modification of impervious surfaces.	The City maintains interactive GIS maps at https://my.spokanecity.org/opendata/gis/.
124	B	2/18/2026	Lowe, John	Suggests additional mitigation measures towards goal of developing added information during the next 5 years, recommends incorporating these measures the EIS in case they contribute towards funding eligibility.	The comment is noted and forwarded to City decision-makers.
124	C	2/18/2026	Lowe, John	Recommended Mitigation Measure - Further Studies: regional groundwater condition assessment, Local effects of climate migration/additional needs due to increased population, studies of improved groundwater recharge from reducing impervious surface footprint.	As stated in **Section 3.1.3** Earth, Water Quality, and Water Resources Mitigation Measures, the EIS recommends continued follow-up on recent environmental code audit (Spokane, 2025) to review Spokane Municipal Code Section 17E.010 Critical Aquifer Recharge Area for additional protections, such as addressing demands on aquifer for uses as temperatures increase. In addition, the City maintains ongoing efforts to support continued studies, monitoring, and protection of groundwater conditions as documented on the Public Works & Utilities website here https://my.spokanecity.org/publicworks/water/quality/ and through partnerships with other water stewards listed on the

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					City's Water-Wise webpage here https://my.spokanecity.org/publicworks/water/water-wise-spokane/. Also see **Section 4.3** Theme response: "Water."
124	D	2/18/2026	Lowe, John	Recommended Mitigation Measure - Citizen science initiatives: workshops for activity scoping/training, environmental monitoring (soil moisture, emissions, river conditions), Promoting community resilience, outreach with universities (fundraising), Government efforts (sponsorship of volunteers, locate funding, etc.).	The City currently partners with other local governments and implements public education and outreach campaigns to study, monitor, protect, and improve earth and water resources in the study area; and **Section 3.1.3** Earth, Water Quality, and Water Resources Mitigation Measures has been updated to recommend continued commitment to these efforts.
124	E	2/18/2026	Lowe, John	With mitigation, what is the ultimate outcome? Scenarios regarding population growth and water availability driven by climate change which have not been fully analyzed. Suggest mitigation plans rather than delay EIS process.	Please see Response to Comment 124-C.
124	F	2/18/2026	Lowe, John	Some explanation of methods used for population growth projections in the City of Spokane should be added to this section to clarify population growth projections used.	Additional text is added to **Chapter 2** of the Final EIS to explain the population projections which are based on the State OFM allocations to Spokane County and an interjurisdictional process to allocate growth based on current population shares and other factors. See: https://www.spokanecounty.gov/5671/Supporting-Plans-and-Drafts.
124	G	2/18/2026	Lowe, John	Concern that growth projections do not reflect likely climate change related migration. Includes multiple sources. Suggested changes to the EIS report: the discussion in this section should include stronger statements that population projections are based on historical experience	The analysis does not specifically account for potential population increases associated with climate migration or climate refugees. Rather the analysis is based on population projections from the state as allocated through regional planning efforts. Population projections are updated by the State Office of Financial Management every 5 years and

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				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.	considered in periodic updates to plans at least every 10 years. If there are population changes they would be factored into future state and regional planning processes. See also **Section 4.3**, Theme 9: Water.
124	H	2/18/2026	Lowe, John	Page 3-20 Section 3.1 Earth, Water Quality and Water Resources, Groundwater Resources. As described in the Draft EIS 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.	**Exhibit 3.1-12** has been updated in the Final EIS to reflect the expansion of the Spokane Valley Rathdrum Prairie Aquifer Protection Area to include all areas within the city boundary per a 08/05/2025 ballot measure. See also **Section 4.3**, Theme 9: Water.

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124	I	2/18/2026	Lowe, John	Sections on groundwater or water availability should expand discussion of drought conditions. CRVA report should be incorporated into sections of the Draft EIS. Further study is needed to understand the longer-term impacts of climate change on the Spokane Valley-Rathdrum Prairie aquifer. No revision is proposed for the impact analysis in the current report, however, mitigation measures are proposed in the general comments as discussed above. These further studies should take a broader view of the aquifer (both geographically and in terms of users) including consideration of the effects of multiple water users on long-term water availability.	**Section 3.1.1** Earth, Water Quality, and Water Resources Affected Environment has been updated to include consideration of the impact of climate change on existing water resource conditions and the potential to increase droughts. **Section 3.1.2** Impacts (see **Exhibit 3.1-16**) includes comparison of climate impact code updates across the alternatives, and **Section 3.1.3** Mitigation Measures documents the incorporated plan feature to develop and implement climate resilience and greenhouse gas reduction goals and policies. Also see **Section 4.3** Theme response: "Water."
125	A	2/18/2026	Mace, Sam	Recommends an inventory and protection of trees, natural areas, wildlife habitat. Emphasizes importance of natural areas for climate change mitigation, especially in lower-income neighborhoods.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
125	B	2/18/2026	Mace, Sam	Supports environmental review exemption only if 100% disturbed and impervious.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
125	C	2/18/2026	Mace, Sam	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
125	D	2/18/2026	Mace, Sam	Concern that the City has allowed developers to flaunt existing rules around the destruction of natural areas.	The City implements critical areas ordinances per requirements of GMA and reviews development applications for consistency with requirements to protect critical area functions and values.

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126	A	2/18/2026	Maloney, Mimi	Prefers Alternative 3 due to greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
126	B	2/18/2026	Maloney, Mimi	Prefers Alternative 3 conditioned on adequate evaluation of environmental impacts from EIS and Comp Plan	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
126	C	2/18/2026	Maloney, Mimi	Recommends clear guardrails to ensure no unmitigated development impact before broadly applying environmental review exemption.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
126	D	2/18/2026	Maloney, Mimi	Recommends inventory of the city's tree canopy, habitat, ecological connectivity, environmental resources.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
126	E	2/18/2026	Maloney, Mimi	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
127	A	2/18/2026	Marcusen, Nathan	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
127	B	2/18/2026	Marcusen, Nathan	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
127	C	2/18/2026	Marcusen, Nathan	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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				neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	
127	D	2/18/2026	Marcusen, Nathan	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
128	A	2/12/2026	Marr, Shenandoah	Concern that road infrastructure was not designed to handle cars associated with projected growth. Requests traffic and safety considerations prior to development.	See **Section 4.3** Theme response: "Transit and infrastructure."
128	B	2/12/2026	Marr, Shenandoah	Concern about flood potential and habitat loss associated with development near or on seasonal wetlands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
128	C	2/12/2026	Marr, Shenandoah	General Support for Alternative 3.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
129	A	2/16/2026	Marshall, Molly	Recommends enforceable mechanisms to ensure development of affordable housing.	See **Section 4.3** Theme response: "Affordable housing"
129	B	2/16/2026	Marshall, Molly	Requests analysis of demolition impacts: displacement of lower-income residents, homeownership reduction, increased rental concentration, loss of neighborhood stability. Also requests anti-displacement policies prior to zone changes.	Comment noted. Please see response to Theme 5. The Draft Comprehensive Plan includes policy H-7.4, Displacement Monitoring to regularly monitor displacement risk over time and policy GS-3.1, Addressing Housing Displacement. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
129	C	2/16/2026	Marshall, Molly	Supports comprehensive tree and natural land inventory to property inform the Critical Areas Code and for compliance with GMA.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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129	D	2/16/2026	Marshall, Molly	Recommends an enforceable critical areas for critical natural systems protection.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
129	E	2/16/2026	Marshall, Molly	Opposes blanket environmental review exemption, as it removes safeguards for wetlands, forests, habitat, and riparian areas embedded within residential neighborhoods. Exemption should only apply to 100% disturbed and impervious properties.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
129	F	2/16/2026	Marshall, Molly	Concern that the Earth, Water Quality, and Water Resources section does not reference the Spokane Valley-Rathdrum Prairie Aquifer. Recommends growth policy explicitly address aquifer protection, stormwater management, and riparian health.	Aquifers (including the Spokane Vally-Rathdrum Prairie Aquifer) are addressed in the EIS in the following Sections: **3.1.1** Water Resources - Groundwater Resources (and mapped on **Exhibit 3.1-12**), **3.1.2** Impacts, and **3.1.3** Mitigation Measures. Also see **Section 4.3** Theme response: "Water."
129	G	2/16/2026	Marshall, Molly	Concern that EIS alternatives will not increase transit usage. Requests greater clarity on how growth impacts will be addressed without greater transit usage.	Please see responses at Themes 7 and 10.
129	H	2/16/2026	Marshall, Molly	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4. Requests climate resilience as a foundational principle, not an afterthought.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
129	I	2/16/2026	Marshall, Molly	Concern that Alternatives 2 & 3 have unnecessary risks that can be avoided by adopting the strongest elements of each alternative while targeting specific goals (listed in comment). Urges incorporation of	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity. Mitigation measures based on the Final EIS will be incorporated into the Comprehensive Plan prior

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				enforceable protections and environmental review before zone changes.	to adoption. Also see **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
130	A	1/3/2026	Martin, Ann	General comment expressing desire for increased height limits for properties in the Downtown West End. Potential support of alternative 3 in achieving these height limits.	Comment noted. Alternative 3 places the greatest intensity downtown. The Preferred Alternative is a blend of Alternatives 2 and 3 and continues to distribute growth downtown. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
131	A	1/21/2026	Martin, Ann	Support for Alternative 3 with elements from Alternative 2.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and continues to distribute growth downtown.
132	A	2/18/2026	Martincic, Dubravka	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
132	B	2/18/2026	Martincic, Dubravka	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
132	C	2/18/2026	Martincic, Dubravka	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
132	D	2/18/2026	Martincic, Dubravka	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
133	A	2/18/2026	McGee, Teresa	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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133	B	2/18/2026	McGee, Teresa	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
133	C	2/18/2026	McGee, Teresa	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
133	D	2/18/2026	McGee, Teresa	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
134	A	2/18/2026	McGee, Tye	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
134	B	2/18/2026	McGee, Tye	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
134	C	2/18/2026	McGee, Tye	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
134	D	2/18/2026	McGee, Tye	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
135	A	2/17/2026	McGuirey, Stephanie	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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135	B	2/17/2026	McGuirey, Stephanie	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
135	C	2/17/2026	McGuirey, Stephanie	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
135	D	2/17/2026	McGuirey, Stephanie	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
136	A	2/18/2026	McMillan, Destiny	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
136	B	2/18/2026	McMillan, Destiny	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
136	C	2/18/2026	McMillan, Destiny	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
136	D	2/18/2026	McMillan, Destiny	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
137	A	2/18/2026	Meenach, Erin	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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137	B	2/18/2026	Meenach, Erin	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
137	C	2/18/2026	Meenach, Erin	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
137	D	2/18/2026	Meenach, Erin	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
138	A	2/16/2026	Mobley, Karen	Urges preservation of tree canopy and natural areas and protecting against development of natural areas. Particularly concerned for the Latah Valley, Upper Lincoln Park and surrounding private lands, and areas near the Spokane River.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
138	B	2/16/2026	Mobley, Karen	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
138	C	2/16/2026	Mobley, Karen	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
138	D	2/16/2026	Mobley, Karen	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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138	E	2/16/2026	Mobley, Karen	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
138	F	2/16/2026	Mobley, Karen	Recommends a tree and natural land inventory in planning documents so planning staff will have awareness of urban forests and wildlife habitat. Recommends coordination with WA Fish and Wildlife to protect against destruction of wetlands and sensitive forest areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review." The City has a critical areas ordinance that protects wetlands and other sensitive areas. The critical areas ordinance is being updated and comments from WA Fish and Wildlife will be considered in the update.
139	A	12/31/2025	Mosher, Thomas	Comment on continuing demand for upper to middle income retiree housing.	Comment noted. The City is planning for a range of housing choices and affordability levels.
139	B	12/31/2025	Mosher, Thomas	Recommended Land Use and/or Zone Change for properties on E 25th Ave and S Lacey Ct. which are owned by Rockwood Retirement (Spokane United Methodist Homes). Recommended land use to allow for middle to higher density housing. Recommended zoning to allow (outright or with CU) non-profit retirement housing.	Comment noted. The City accepts applications to amend the maps in the Comprehensive Plan each year, unless paused due to larger ongoing planning work, such as the Comprehensive Plan Periodic Update. Please see SMC 17G.020 for details on the process.
139	C	12/31/2025	Mosher, Thomas	Comment on the need for a controlled intersection at 25th Ave and SE Blvd., including specific function recommendations and a request for a traffic study.	Comment noted. The City requires traffic impact analysis for developments that would increase trips and can condition development and require traffic impact fees. Suggestions for future projects will be forwarded to decision-makers.
140	A	2/17/2026	Mrgudic, Kate	Prefers Alternative 3 on the condition that cumulative environmental impacts are adequately evaluated, avoided, and mitigated, by the EIS and Comprehensive Plan.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.

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140	B	2/17/2026	Mrgudic, Kate	Prefers Alternative 3 due to greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
140	C	2/17/2026	Mrgudic, Kate	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
140	D	2/17/2026	Mrgudic, Kate	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
141	A	2/18/2026	Nagel, Mary & Dean	Strongly support Goals supporting urban canopy on public and private lands. Recommend closing loopholes that allow private owners/developers to destroy neighborhood eco-systems that provide urban canopy and habitat. Reference deforestation and destruction of basalt formation at 1111 E 27th Ave.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
141	B	2/18/2026	Nagel, Mary & Dean	Supports Alternative 1 due to less "infill" of high-end mixed housing in established neighborhoods.	The comment is noted and forwarded to City decision-makers. The City is required to meet housing targets at all income levels and to provide multimodal travel. Infill development is a common occurrence in well-established communities with services and transit.
141	C	2/18/2026	Nagel, Mary & Dean	Concern that Alternative 2 & 3 will result in unregulated development, congestion, lack of parking, emergency access issues, dismantling	The City applies development regulations to ensure development provides adequate emergency access, addresses traffic impacts, and protects critical areas. The City is considering policy updates through PlanSpokane 2046 and amendments to its regulations to address GMA requirements and compatibility including

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				of urban canopy/habitat, and negative mental health.	landscaping via the BUILDSpokane effort. Please see: https://my.spokanecity.org/planspokane/.
141	D	2/18/2026	Nagel, Mary & Dean	Would prefer an additional alternative with more defined strategies to protect urban eco-systems.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity. The Preferred Alternative assumes updates to policies in the Comprehensive Plan, and draft policies in the Natural Environment element address ecosystem protection. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
142	A	2/17/2026	Nault, Patricia	Concern that no one alternative can responsibly address growth in the same way across diverse neighborhoods.	The City maintains a citywide Comprehensive Plan per GMA requirements but also has adopted a number of subarea plans to address diverse neighborhoods as described in EIS **Section 3.6**.
142	B	2/17/2026	Nault, Patricia	Interest in an actual plan for how services/infrastructure will expand to meet the needs of a larger population and a more extensive built environment.	Comment noted. The City updates its Six-Year Capital Improvement Program (CIP) annually in alignment with the needs identified in the Capital Facilities Plan, which is part of the Comprehensive Plan. These updates provide an opportunity to plan for services and infrastructure as the population grows.
142	C	2/17/2026	Nault, Patricia	Concern that the EIS does not address wildfire danger, emergency evacuation routes, cost, and availability of homeowners insurance coverage in high fire danger areas.	Please see responses in Theme 10 under **Section 4.3**.
142	D	2/17/2026	Nault, Patricia	Interest in actual numbers of water demand related to growing population, drought, heat, and climate change. Would like to see a plan for maintaining water distribution system and preventative measures to avoid losing water to leaks.	Water demand growth is from the City of Spokane's Water System Plan (available online at https://my.spokanecity.org/publicworks/water/your-water-system/). The Water System Plan also outlines capital improvement and maintenance projects which address leakage.

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142	E	2/17/2026	Nault, Patricia	Concern that directing growth to Grandview/Thorpe and Latah/Hangman neighborhoods conflicts with GMA goals to reduce sprawl/low density development and encouraging reducing greenhouse gas emissions/VMTs. Both areas described as 100% car dependent and disconnected.	Comment noted. Most growth in the action alternatives and the Preferred Alternative is directed to areas with frequent transit access in urban hubs and along corridors. In the referenced neighborhoods, the City is retaining the current intensity of growth allowed today. The City requires adequate infrastructure with new development. The City has also reviewed infrastructure funding strategies in the area.
142	F	2/17/2026	Nault, Patricia	Infrastructure and public services are lacking and/or not conducive to connectivity in the Grandview/Thorpe and Latah/Hangman neighborhoods.	Please see Response to Comment 142-E.
142	G	2/17/2026	Nault, Patricia	Calls on the City to craft a plan for addressing infrastructure/public service deficiencies or restrict development in the Grandview/Thorpe and Latah/Hangman neighborhoods.	Please see Response to Comment 142-E.
143	A	2/18/2026	Nayeli, Liva	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
143	B	2/18/2026	Nayeli, Liva	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
143	C	2/18/2026	Nayeli, Liva	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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143	D	2/18/2026	Nayeli, Liva	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
144	A	2/17/2026	Newhouse, Katie & Emil	If density increases, preference for predominantly homeownership. Protect Neighborhood community.	Comment noted. All alternatives allow single-unit and multi-unit housing as described in Final EIS **Chapter 2**. The Draft Comprehensive Plan includes policies in support of homeownership, such as H-2.3, Homeownership; H-4, Affordable Housing; and H-4.7, Community Ownership Models. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
145	A	2/17/2026	Newhouse, Katie & Emil	Support for letter sent by Community Assembly	Comment noted. See responses to Community Assembly letter under Organizations above.
146	A	2/18/2026	Noll, Judy	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
146	B	2/18/2026	Noll, Judy	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
146	C	2/18/2026	Noll, Judy	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
146	D	2/18/2026	Noll, Judy	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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147	A	2/15/2026	Ogden, Jennifer	Recommends renovating older structures and unused office space for housing instead of expensive new housing development.	Comment noted. Adaptive reuse is referenced in **Section 3.4** of the EIS. The draft Comprehensive Plan includes policies in support of adaptive reuse, such as DP-2.17, Affordable Housing; DP-3.3, Community Resiliency; DP-3.2, Accessible Housing for All Incomes; CF-1.4, Adaptive Reuse; and N-2.4, Neighborhood Improvement. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
147	B	2/15/2026	Ogden, Jennifer	Recommends affordable housing downtown for the economic benefits from residents in proximity to work and leisure opportunities downtown.	See **Section 4.3** Theme response: "Affordable housing."
147	C	2/15/2026	Ogden, Jennifer	Recommends the City incentivize homeowners and developers to preserve existing tree canopy in efforts to meet 30% canopy goal and combat climate change.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
147	D	2/15/2026	Ogden, Jennifer	Recommends against expensive infill that does not match the aesthetic of the area, nor contribute to affordable housing. Recommends instead renovating older structures for multi-family and affordable units.	Comment noted. Adding housing units within existing structures (e.g., adding ADU) or adaptive reuse renovating existing structures is encouraged in the City's land use and historic preservation regulations; see **Sections 3.4** and **3.5** of the EIS. The draft Comprehensive Plan includes policies in support of adaptive reuse, such as DP-2.17, Affordable Housing; DP-3.3, Community Resiliency; DP-3.2, Accessible Housing for All Incomes; CF-1.4, Adaptive Reuse; and N-2.4, Neighborhood Improvement. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
148	A	3/5/2026	Ohman, David	Urges incentivizing residential and commercial growth and less tax burden.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity. Policies in the draft

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					Comprehensive Plan support incentives for residential and commercial growth and a regulator environment that supports economic activity and growth. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
148	B	3/5/2026	Ohman, David	Urges investing downtown and expresses concern over homeless population downtown.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and continues to distribute growth downtown. The draft Comprehensive Plan includes policy CH-6.3, Supporting Unhoused and Unstably Housed Neighbors. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
148	C	3/5/2026	Ohman, David	Concern over losing jobs and housing to Idaho.	
149	A	2/13/2026	Orcasitas, Bre	General comment on the value of Spokane parks, libraries, community events, businesses, public gathering spaces, old growth trees, the waste to energy plant, clean rivers, clean drinking water, and connection to nature/trails.	Comment noted. Access to public services and availability of utilities and water is addressed in **Sections 3.1**, **3.8**, and **3.9** of the EIS. The draft Comprehensive Plan includes policies in support of these topics. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
149	B	2/13/2026	Orcasitas, Bre	Recommends the use of prescribed burns to protect against wildfire, as well as education on the value of prescribed burns.	Comment noted. The Final EIS references fuels reduction in mitigation measure in **Section 3.8**. Please also see the City of Spokane Fire Department's program: https://my.spokanecity.org/fire/prevention/wildfires/.
149	C	2/13/2026	Orcasitas, Bre	Recommends planting more trees and protecting wildlife habitat.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
149	D	2/13/2026	Orcasitas, Bre	Recommends implementing restrictions on water usage for lawns, including the city. Particularly Cannon Hill Parks grass.	Comment noted. The City has implemented recommendations for lawn watering schedules within the City. See Drought Response Measures Ordinance.

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149	E	2/13/2026	Orcasitas, Bre	Recommends improving the recycling program, specifically with a Ridwell facility.	Comment noted. **Section 3.8** of the EIS addresses solid waste and recycling. The draft Comprehensive Plan includes policies in support of recycling, such as CF-3.4, Waste Reduction and Recycling and CH-9.9, Waste Reduction Education. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
149	F	2/13/2026	Orcasitas, Bre	Increase environmental education opportunities for youth and adults.	Comment noted. The draft Comprehensive Plan includes policies in support of environmental education, such as NE-13, Natural Environment Education and NE-13.5 Environmental Education for Youth. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
149	G	2/13/2026	Orcasitas, Bre	Support for the bus system and interest in reviving the trolley system.	Comment noted. Transit is addressed in **Section 3.7** of the EIS. The draft Comprehensive Plan includes policies in support of transit, such as TR-4.3, Support Public Transit Expansion. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
149	H	2/13/2026	Orcasitas, Bre	Recommends increasing resources to assist those experiencing homelessness, cites Austin, Texas as a case study.	Comment noted. An evaluation of alternatives in terms of housing requirements to address emergency and permanent housing is included in **Section 3.5** of the EIS. The draft Comprehensive Plan includes policy CH-6.3, Supporting Unhoused and Unstably Housed Neighbors. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
150	A	2/16/2026	Ortiz, Christi	Urges protection against loss of natural areas within the City from development.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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151	A	2/18/2026	Petersen, Mike	Prefers Alternative 3 due to greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
151	B	2/18/2026	Petersen, Mike	Prefers Alternative 3 conditioned on adequate evaluation of environmental impacts from EIS and Comp Plan	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
151	C	2/18/2026	Petersen, Mike	Recommends inventory of the city's tree canopy, habitat, ecological connectivity, environmental resources.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
151	D	2/18/2026	Petersen, Mike	Recommends ensuring no unmitigated development impact before broadly applying environmental review exemption.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
151	E	2/18/2026	Petersen, Mike	Supports exemption only if development areas are 100% impervious.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
151	F	2/18/2026	Petersen, Mike	Recommends 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.	The comment is noted and forwarded to City decision-makers.
151	G	2/18/2026	Petersen, Mike	Supports bonus density within a quarter mile of transportation corridors if at least 10% and/or 20% of units are "low income".	Comment noted. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
152	A	3/5/2026	Peterson, Heidi	Prefers Alternative 3 for the focus on growth downtown, regional hubs, and areas with greatest investment in transit and	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3. The Preferred Alternative still focuses a large amount of growth downtown and in areas with access to

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				transportation, as well as increased employment opportunities.	major transit and provides increased employment and industrial uses.
153	A	3/5/2026	Phillips, Sally	Prefers Alternative 2 for the residential business and business hubs but also likes the job projection numbers from Alternative 3. Also prefers Alternative 2 for connection to the Centers and Corridors plans. General preference for Alternative 2.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity.
153	B	3/5/2026	Phillips, Sally	Concern that employees will not use public transportation to get to the West Plains.	Comment noted. On-going coordination with STA will be required to ensure transit service is in line with demand in areas of the City such as West Plains.
153	C	3/5/2026	Phillips, Sally	Support for no longer having single residence zoning.	See **Section 4.3** Theme response: "Infill."
153	D	3/5/2026	Phillips, Sally	Support for streamlining permit approval in all three alternatives.	See **Section 4.3** Theme response: "Support for streamlined environmental review."
154	A	2/18/2026	Porter, Joshua	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
154	B	2/18/2026	Porter, Joshua	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
154	C	2/18/2026	Porter, Joshua	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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154	D	2/18/2026	Porter, Joshua	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
155	A	2/18/2026	Potts, Tim	Support for Alternative 3.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
156	A	2/17/2026	Reizik, Agnes	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
156	B	2/17/2026	Reizik, Agnes	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
156	C	2/17/2026	Reizik, Agnes	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
156	D	2/17/2026	Reizik, Agnes	Opposes blanket environmental review exemption. Exemption is supported only if 100% disturbed and impervious areas. Supports protection of natural lands, etc. in the Draft EIS.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
157	A	2/18/2026	Rhodes, Mark Walker	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
157	B	2/18/2026	Rhodes, Mark Walker	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
157	C	2/18/2026	Rhodes, Mark Walker	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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				neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	
157	D	2/18/2026	Rhodes, Mark Walker	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
158	A	3/5/2026	Rip, Saul	Considers additional fees to fund mitigation strategies to be an obstacle to development.	Per **Section 3.5** of the EIS, the City will consider barriers to housing development and adequate provisions to meet its housing targets with its Housing Element as required by the GMA.
158	B	3/5/2026	Rip, Saul	Suggest climate considerations are good for the environment but will reduce overall development, pushing developers to Idaho where regulation is lax and there is no state energy code.	The comment is noted. GMA climate element requirements are meant to support the goals of the act to allow for housing and economic growth while protecting environmental quality and health. (RCW 36.70a.010 and 020)
159	A	2/17/2026	Rising, Erin	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
159	B	2/17/2026	Rising, Erin	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
159	C	2/17/2026	Rising, Erin	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
159	D	2/17/2026	Rising, Erin	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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160	A	2/18/2026	Robidoux, Leilani	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
160	B	2/18/2026	Robidoux, Leilani	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
160	C	2/18/2026	Robidoux, Leilani	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
160	D	2/18/2026	Robidoux, Leilani	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
161	A	2/18/2026	Robinson, Danyelle	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
161	B	2/18/2026	Robinson, Danyelle	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
161	C	2/18/2026	Robinson, Danyelle	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
161	D	2/18/2026	Robinson, Danyelle	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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162	A	2/18/2026	Rodriguez, Lori	Concern that SEPA is the only way for members of the community who can't afford to throw money at the process to get notice and comment on projects prior to permitting.	The City provides comment opportunities on development permits such as through notices of application and hearings per SMC Title 17.G.
162	B	2/18/2026	Rodriguez, Lori	Concern that the comprehensive plan already allows property owners to "do what [they] want", resulting in high density of residents who have no personal or financial investment in the community.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
162	C	2/18/2026	Rodriguez, Lori	Concern that the City is not installing infrastructure upgrades necessary to adequately support increased density. Concern that developer contributions to infrastructure upgrades are not sufficient.	See **Section 3.9** mitigation measures that describe regulations and mitigation measures and regular capital planning.
162	D	2/18/2026	Rodriguez, Lori	Concern over the destruction of urban forests and historic homes, and that there will be no desire to live in a "run-down urban core".	Please see **Sections 3.1, 3.3, and 3.4** addressing water resources, plants and animals, and cultural resources which address potential impacts and mitigation measures. With the Preferred Alternative City is updating its policies on the natural environment and historic and cultural resources and updating regulations such as landscaping. See PlanSpokane 2046 and BUILDSpokane: https://my.spokanecity.org/planspokane/.
163	A	2/18/2026	Rodriguez, Lori	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
163	B	2/18/2026	Rodriguez, Lori	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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163	C	2/18/2026	Rodriguez, Lori	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
163	D	2/18/2026	Rodriguez, Lori	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
164	A	2/17/2026	Ronningen, Nicole	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
164	B	2/17/2026	Ronningen, Nicole	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
164	C	2/17/2026	Ronningen, Nicole	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
164	D	2/17/2026	Ronningen, Nicole	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
165	A	2/18/2026	Rookwood, Sevven	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
165	B	2/18/2026	Rookwood, Sevven	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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165	C	2/18/2026	Rookwood, Sevven	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
165	D	2/18/2026	Rookwood, Sevven	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
166	A	2/18/2026	Rowe, Deborah K	Recommends an inventory and protection of trees, natural areas, and wildlife habitat.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
166	B	2/18/2026	Rowe, Deborah K	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
167	A	2/18/2026	Rowe, Hal	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
167	B	2/18/2026	Rowe, Hal	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
167	C	2/18/2026	Rowe, Hal	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
167	D	2/18/2026	Rowe, Hal	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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167	E	2/18/2026	Rowe, Hal	Supports maintaining natural areas for health of our community, other species, and the planet.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
168	A	2/18/2026	Rusev Dawley, Amy	Concern over need for evaluation of biodiversity/ecology within natural areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
168	B	2/18/2026	Rusev Dawley, Amy	Concern over environmental review exemption: 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.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
168	C	2/18/2026	Rusev Dawley, Amy	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
169	A	2/18/2026	Scanlan, Terra	Opposes elimination of environmental review in order to protect the environment. Describes firsthand climate change observations.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
169	B	2/18/2026	Scanlan, Terra	Prefers Alternative 3.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
170	A	3/5/2026	Schubach, Richard	Concerned over lack of irrigation and street trees (maintenance) on North Market Street	Comment noted. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.

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				between Euclid and Francis. Would like to see the trees and irrigation restored.	
170	B	3/5/2026	Schubach, Richard	Emphasizes need for landscaping between the bike path and the railroad tracks along Illinois Ave. between Market and Perry. Suggests landscaping to create a positive impact on the environment and property values.	Comment noted. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
171	A	2/18/2026	Schultz, Riley	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
171	B	2/18/2026	Schultz, Riley	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
171	C	2/18/2026	Schultz, Riley	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
171	D	2/18/2026	Schultz, Riley	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
172	A	2/17/2026	Shumacher De Donato, Elisabeth	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
172	B	2/17/2026	Shumacher De Donato, Elisabeth	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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172	C	2/17/2026	Shumacher De Donato, Elisabeth	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas. References Exhibit 7 (location unspecified).	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
172	D	2/17/2026	Shumacher De Donato, Elisabeth	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
173	A	2/18/2026	Smiskin, Kimberly	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
173	B	2/18/2026	Smiskin, Kimberly	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
173	C	2/18/2026	Smiskin, Kimberly	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
173	D	2/18/2026	Smiskin, Kimberly	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
174	A	2/18/2026	Smith, Logan	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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174	B	2/18/2026	Smith, Logan	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
174	C	2/18/2026	Smith, Logan	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
174	D	2/18/2026	Smith, Logan	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
175	A	2/19/2026	Snow, North	Urges protection of trees and green in neighborhoods. Please do not pass any new bill that will directly harm our environment, we do not need this.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
176	A	2/18/2026	Soderquist, Jordan	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
176	B	2/18/2026	Soderquist, Jordan	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
176	C	2/18/2026	Soderquist, Jordan	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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176	D	2/18/2026	Soderquist, Jordan	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
177	A	2/16/2026	Soeldner, W. Thomas	Recommends inventory of the city's tree canopy and natural lands and associated codes.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
177	B	2/16/2026	Soeldner, W. Thomas	Supports an enforceable critical areas ordinance.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
177	C	2/16/2026	Soeldner, W. Thomas	Opposes blanket environmental review exemption. Exemption should only apply to 100% disturbed and impervious properties.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
177	D	2/16/2026	Soeldner, W. Thomas	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
178	A	2/25/2026	Spurr, Jessica	Concern that Environmental Review Exemption will only benefit developers building homes for higher income individuals and will not benefit low-income residents.	See **Section 4.3** Theme responses: "Tree canopy and habitat / concern about environmental review" and "Affordable housing." Housing affordability is a key topic in the Comprehensive Plan. The City is required to remove barriers to housing affordability and policies in the draft Comprehensive Plan Housing Element reflect this requirement.
178	B	2/25/2026	Spurr, Jessica	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
178	C	2/25/2026	Spurr, Jessica	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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178	D	2/25/2026	Spurr, Jessica	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
178	E	2/25/2026	Spurr, Jessica	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
179	A	2/18/2026	Stempf, Debbie	Alternative 3 provides the greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
180	A	2/18/2026	Stenersen, Mark	Prefers Alternative 1 and recommends measures that protect neighborhood livability, preserve tree canopy and green space, and meet documented affordability needs.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3. See **Section 4.3** Theme responses: "Affordable housing" and "Tree canopy and habitat / concern about environmental review."
180	B	2/18/2026	Stenersen, Mark	Review process must be evaluated against Spokane's adopted environmental goals, including a 30% tree canopy by 2030.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
180	C	2/18/2026	Stenersen, Mark	Concern that the plan does not do enough to address affordable housing development. Emphasizes greater need for housing affordable for lower-income households.	See **Section 4.3** Theme response: "Affordable housing."
180	D	2/18/2026	Stenersen, Mark	Concern that lot coverage for infill does not allow enough room for trees. Emphasizes benefits of trees.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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180	E	2/18/2026	Stenersen, Mark	Concern that there has not been enough verified community input supporting retail in residential neighborhoods.	See **Section 4.3** Theme response: "Mixed use and development."
181	A	1/12/2026	Stohr, Mary	General support for Alternative 1. Safety, habitat, and development concerns associated with Alternatives 2 and 3.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3. The Final EIS includes mitigation measures to address impacts to trees and natural habitat. Concentrated growth also discourages sprawl, which has habitat and tree impacts regionally. Specific code updates related to neighborhood commercial uses will be considered after the Comprehensive Plan is adopted and will have a public process with opportunities for comment. Neighborhood commercial uses support walkability and therefore lower transportation emissions and air quality impacts. The Washington Department of Commerce has prepared guidance to implement HB 1220 that higher density housing options are more likely to serve households with lower incomes than low density options. The Preferred Alternative supports moderate-high density housing near major transit and in areas with planned capacity.
182	A	2/18/2026	Stowe, Anna	Urges protection of natural areas, redevelopment instead of new development, and creating more natural areas. Concern about potential elimination of environmental review.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
182	B	2/18/2026	Stowe, Anna	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
183	A	2/18/2026	Sumner, Lorraine	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

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183	B	2/18/2026	Sumner, Lorraine	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
183	C	2/18/2026	Sumner, Lorraine	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
183	D	2/18/2026	Sumner, Lorraine	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
184	A	2/17/2026	Swan, Kaiulani	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
184	B	2/17/2026	Swan, Kaiulani	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
184	C	2/17/2026	Swan, Kaiulani	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
185	A	3/5/2026	Taylor, Liam J	Would prefer more ambitious alternatives. In Alternative 2 encourages growth everywhere, outside of the corridors and more on the South Hill, including more neighborhood retail.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3 and focuses housing growth near transit and in areas with planned capacity. This includes mixed-use /commercial nodes in the South Hill area.
185	B	3/5/2026	Taylor, Liam J	Remove arbitrary development standards, including FAR, building setbacks,	The comment is noted. The action alternatives including the Preferred Alternative allow a wider variety of housing types to

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				building/massing articulation, aesthetic regulations, height limits, etc. Recommends development of all housing types in every neighborhood.	meet housing targets. The City has removed height limits in Downtown. The City is reviewing adequate provisions and removing regulatory barriers with its Housing Element update. See PlanSpokane 2046 and BUILDSpokane: https://my.spokanecity.org/planspokane/.
185	C	3/5/2026	Taylor, Liam J	Make all neighborhoods Mixed-Use, limit drive-thrus and industrial uses, distribute traffic through the neighborhood and free up the corridors.	The comment is noted. The action alternatives including the Preferred Alternative expand potential locations for mixed uses, and new policies and strategies emphasize multimodal transportation.
185	D	3/5/2026	Taylor, Liam J	Prioritize Road Safety, including large intersection bulb-outs, medians near bus stops, prioritize roundabouts - can reduce carbon pollution by minimizing traffic flow.	Comment noted. Comments on policies are outside of the scope of the environmental analysis. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
185	E	3/5/2026	Taylor, Liam J	Annex and expand UGA.	The comment is noted and forwarded to City decision-makers. Note that the City's current and draft Comprehensive Plan include policies on annexation. Please see Draft Chapters at: https://my.spokanecity.org/planspokane/chapter-review/.
185	F	3/5/2026	Taylor, Liam J	SEPA exemption for all non-industrial projects to avoid SEPA being used to arbitrarily stop development and waste time/money without protecting the environment.	See **Section 4.3** Theme response: "Support for streamlined environmental review."
185	G	3/5/2026	Taylor, Liam J	Simplify Comp Plan elements, particularly Goals and Policies. Remove all immeasurable goals and policies, specifically mentions Goal N-1 from the draft comp plan.	Comment noted. The action alternatives including the Preferred Alternative include a full revision of the Comprehensive Plan. The Draft Comprehensive Plan has consolidated and revised many policies with implementation feasibility as a consideration. The City has developed draft Chapter 2 Community Indicators to track progress. See: https://my.spokanecity.org/planspokane/chapter-review/.

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185	H	3/5/2026	Taylor, Liam J	Concern that historic preservation will unnecessarily stunt growth, development, and property rights.	The comment is noted and forwarded to City decision-makers. Please see Response to Comment 57-D.
185	I	3/5/2026	Taylor, Liam J	Warns against letting "NIMBY's determine City decisions.	The comment is noted and forwarded to City decision-makers.
185	J	3/5/2026	Taylor, Liam J	Suggests that when projects meet zoning standards they shouldn't need reduce public input, comments, hearings, appeals, etc.	The City provides comment opportunities on development permits such as through notices of application and hearings per SMC Title 17.G.
186	A	2/18/2026	Taylor, Todd	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
186	B	2/18/2026	Taylor, Todd	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
186	C	2/18/2026	Taylor, Todd	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
186	D	2/18/2026	Taylor, Todd	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
187	A	2/18/2026	Terjeson, Shawn	Support for Alternative 2	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
187	B	2/18/2026	Terjeson, Shawn	To adequately address climate refugees, recommends changing text from "Growth numbers should consider possibility of climate	See **Section 4.3**, Theme 10. Comments on policies will be forwarded to City decision-makers.

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				refugees" to Growth numbers will consider the possibility of climate refugees". References a Spokane Inlander article about water scarcity in the U.S.	
187	C	2/18/2026	Terjeson, Shawn	Concern that the City is giving up on increased use of transit. Recommends increasing transit infrastructure.	The City supports public transit access and expansion, as described in policies TR-4.2 and TR-4.3. Continued coordination with STA will be needed to align transit service with demand. The Preferred Alternative also focuses housing growth near transit.
187	D	2/18/2026	Terjeson, Shawn	Concerned that the EIS does not adequately address affordable housing, would like to see more detailed plans to incentivize affordable housing development rather than market rate.	See **Section 4.3** Theme response: "Affordable housing."
187	E	2/18/2026	Terjeson, Shawn	Concern that developers ideas of what the city should look like do not reflect the communities vision.	The comment is noted and forwarded to City decision-makers.
187	F	2/18/2026	Terjeson, Shawn	Concern that the EIS does not meaningfully incorporate neighborhood councils.	See **Section 4.3** Theme response: "Neighborhood councils."
188	A	2/10/2026	Tomsic, Carol	Protect aquifer via permeable asphalt and concrete alternatives.	As stated in **Section 3.1.2** Earth, Water Quality, and Water Resources Impacts and **Section 3.1.3** Mitigation Measures, future development associated with the selected alternative would have to comply with applicable regulations and design standards, which encompass the use of low impact development approaches such as permeable asphalt and concrete alternatives. Also see **Section 4.3** Theme response: "Water."
188	B	2/10/2026	Tomsic, Carol	Recommended partnership with STA and incentives for increased transit use near high performance transit lines.	The City supports public transit access and expansion, as described in policies TR-4.2 and TR-4.3. Continued coordination with STA will be needed to align transit service with demand.

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188	C	2/10/2026	Tomsic, Carol	Recommended regulation limiting soil clearing/disturbance on private land and adjacent to city parks.	Development of specific codes to set City-wide standards for ground clearing and disturbance on private lands is outside the scope of this EIS. These activities are currently governed under Chapter 17D of Spokane Municipal Code as well as existing state and federal laws, and any future development would need to comply. **Section 3.3.3** of the Draft EIS recommends the consideration of additional code language for the City's critical areas regulations that is similar to provisions contained in the shoreline regulations for limiting clearing and minimizing soil disturbance. The preferred alternative will minimize incentives for ground disturbance and clearing on undeveloped land and in less densely developed areas of the City by focusing growth in more densely developed areas and along major transit and transportation corridors.
188	D	2/10/2026	Tomsic, Carol	Recommended limitation of office/commercial sprawl into residential neighborhoods. Recommended focus on empty lot development.	The City allows growth on vacant properties and on redevelopment sites. The location of employment uses is largely in hubs (e.g., Downtown) and corridors. See Response to Comment 85-F and Response to Comments Theme 4 regarding neighborhood commercial that is promoted in the Preferred Alternative. The City development standards are meant to address transition of higher intensity locations and lower intensity locations as described in EIS **Section 3.4.3**.
188	E	2/10/2026	Tomsic, Carol	Property and utility tax rates, insurance rates, and costly repairs have made homeownership cost-burdensome.	Comment noted. Addressing barriers to affordable housing including an evaluation of City regulations are part of the periodic update of the Housing Element associated with the action alternatives including the Preferred Alternative. The draft Comprehensive Plan includes policies that support reduced costs for homeowners, such as H-1.5, Expanded Opportunity for Incentives and Funding; H-4.5, Partnerships to Reduce Financial

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					Barriers; H-6.2, Property Responsibility and Maintenance; H-6.3, Energy Efficiency Assistance; and HH-7.2, Financial Relief.
188	F	2/10/2026	Tomsic, Carol	Request to cite neighborhood councils at every opportunity, more than presently.	See **Section 4.3** Theme response: "Neighborhood councils."
188	G	2/10/2026	Tomsic, Carol	Recommend requiring development that affect traffic/pedestrians fund traffic calming during construction. Request to increase the allocation for the Spokane Safe Streets for All program.	Comment noted. Comments on policies are outside of the scope of the environmental analysis. Desired policy changes related to the 2026 periodic update will be forwarded to City decision-makers.
188	H	2/10/2026	Tomsic, Carol	Recommend emphasizing partnership with parks and schools at every opportunity.	See **Section 4.3** Theme response: "Parks, libraries, and public spaces."
188	I	2/10/2026	Tomsic, Carol	Recommend water conservation alternatives to raising utility fees.	Comment noted. The City considers many options when reviewing strategies to improve water conservation.
189	A	2/17/2026	VanDeest, Konrad	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
189	B	2/17/2026	VanDeest, Konrad	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
189	C	2/17/2026	VanDeest, Konrad	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
189	D	2/17/2026	VanDeest, Konrad	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
190	A	2/17/2026	VanDeest, Stefani	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
190	B	2/17/2026	VanDeest, Stefani	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
190	C	2/17/2026	VanDeest, Stefani	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
190	D	2/17/2026	VanDeest, Stefani	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
191	A	2/9/2026	VanMansum, Lisa	Comment on the need for more aggressive implementation of plans and objectives around: Connections and Corridors, public transit, bike lanes, park maintenance, and tree canopy.	The comment is noted and forwarded to City decision-makers. The Preferred Alternative includes a focus of mixed development in hubs and along corridors in proximity to frequent transit. Updated policies address green infrastructure and incorporate city system plans such as Parks and Natural Lands Master Plan. The City is preparing updated development regulations addressing GMA requirements as well as compatibility such as with landscaping.
191	B	2/9/2026	VanMansum, Lisa	Comment on the need for trees in any and all developments, particularly at the development stage as opposed to post development.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
192	A	2/18/2026	Varona, Darcy	Prefers Alternative 3 due to greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
192	B	2/18/2026	Varona, Darcy	Prefers Alternative 3 conditioned on adequate evaluation of environmental impacts from EIS and Comp Plan	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
192	C	2/18/2026	Varona, Darcy	Recommends clear guardrails to ensure no unmitigated development impact before broadly applying environmental review exemption.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
192	D	2/18/2026	Varona, Darcy	Recommends inventory of the city's tree canopy, habitat, ecological connectivity, environmental resources.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
192	E	2/18/2026	Varona, Darcy	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
193	A	3/6/2026	Vaughan, J.	Suggests only focusing on clean air and clean water for environmental review, and that anything more may put excessive costs on taxpayers, and stifle existing resources.	See **Section 4.3** Theme response: "Support for streamlined environmental review."
193	B	3/6/2026	Vaughan, J.	Concern that regulations and taxes are pushing companies out of Washington State.	The comment is noted and forwarded to City decision-makers. The City is developing its plan and regulations to allow for housing and economic growth while protecting environmental quality and health. (RCW 36.70a.010 and 020). The City is reviewing adequate provisions and removing regulatory barriers with its Housing Element update. See PlanSpokane 2046 and BUILDSpokane: https://my.spokanecity.org/planspokane/.

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
193	C	3/6/2026	Vaughan, J.	Concern that any environmental review beyond clean air and water concerns will inflate the cost of existing resources, create artificial price hikes, and create opportunities for fraud.	See **Section 4.3** Theme response: "Support for streamlined environmental review."
194	A	3/5/2026	Vermilion, Megan	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
194	B	3/5/2026	Vermilion, Megan	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
194	C	3/5/2026	Vermilion, Megan	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
194	D	3/5/2026	Vermilion, Megan	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
195	A	2/18/2026	Waddle, Lisa	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
195	B	2/18/2026	Waddle, Lisa	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
195	C	2/18/2026	Waddle, Lisa	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
				neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	
195	D	2/18/2026	Waddle, Lisa	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
196	A	2/18/2026	Wallingford, John	Emphasizes protection of tree canopy as a facet of environmental stewardship.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
196	B	2/18/2026	Wallingford, John	Concern that clearing of trees to build affordable housing will result in economic disparity.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
196	C	2/18/2026	Wallingford, John	Emphasizes tree canopy as providing climate resilience, particularly in lower income neighborhoods. Indicates fire risks should be considered.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review." Please see Response to Theme 10. In addition, see **Section 3.2.3** and **Section 3.3.3** of the Final EIS which discuss potential policies and other strategies that incorporate best practices for reducing the risk of wildfires and mitigating the impacts of extreme heat.
196	D	2/18/2026	Wallingford, John	Urges protecting mature trees through permitting and work with professional arborists.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
196	E	2/18/2026	Wallingford, John	Urges updated policies promoting affordable housing options in areas with more tree canopy. Recommends including policies increasing program resources for SpoCanopy, incentives for habitat conservation/restoration and land acquisition opportunities.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
197	A	2/18/2026	Ward, Melissa	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
197	B	2/18/2026	Ward, Melissa	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
197	C	2/18/2026	Ward, Melissa	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
197	D	2/18/2026	Ward, Melissa	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
198	A	2/18/2026	Welki, Leah	Prefers Alternative 3 due to greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	The comment is noted and forwarded to City decision-makers. The Preferred Alternative blends features of Alternatives 2 and 3.
198	B	2/18/2026	Welki, Leah	Prefers Alternative 3 conditioned on adequate evaluation of environmental impacts from EIS and Comp Plan	The comment is noted and forwarded to City decision-makers. The Preferred Alternative blends features of Alternatives 2 and 3.
198	C	2/18/2026	Welki, Leah	Recommends clear guardrails to ensure no unmitigated development impact before broadly applying environmental review exemption.	The comment is noted. Please see **Section 4.3**, Theme 3.
198	D	2/18/2026	Welki, Leah	Recommends inventory of the city's tree canopy, habitat, ecological connectivity, environmental resources.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
198	E	2/18/2026	Welki, Leah	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods.	The comment is noted. Please see **Section 4.3**, Theme 1.
199	A	2/18/2026	Wiltshire, Megan	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
199	B	2/18/2026	Wiltshire, Megan	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
199	C	2/18/2026	Wiltshire, Megan	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
199	D	2/18/2026	Wiltshire, Megan	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
200	A	2/17/2026	Worley, Patty	Large developments should have to do environmental impact reviews. Must be careful not to destroy our natural environment even if increasing density within city limits. New development should be on already paved or cleared land or where older buildings are torn down.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
201	A	12/21/2025	Yach, Leslie Gail & Steven	Concern that existing access challenges for residences on W Falls Ave. will be worsened by potential infill middle housing development.	The City considers adequate infrastructure including access and emergency services when reviewing plats, PUDs, and other permits. See Theme 10 regarding evacuation planning.

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
				Particularly concerned over emergency services access.	Impacts related to emergency service access are evaluated in **Section 3.8.4**. Impacts to public services and infrastructure can be managed through regular planning, staffing processes, and mitigation measures.
202	A	2/17/2026	Young, Jim	Recommends inventory of the city's tree canopy, habitat, and natural lands.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
202	B	2/17/2026	Young, Jim	Supports an enforceable critical areas ordinance to protect critical areas, trees, habitat, water quality, etc.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
202	C	2/17/2026	Young, Jim	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Exemption is supported only if 100% disturbed and impervious areas.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
202	D	2/17/2026	Young, Jim	In favor of the Climate Resilience and Sustainability Board's recommended Policy Land Use & Zoning 2-4.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
203	A	2/18/2026	Young, Jim	Prefers Alternative 3 due to greatest long-term climate, land-use, water, transportation, and infrastructure-efficiency benefits.	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
203	B	2/18/2026	Young, Jim	Prefers Alternative 3 conditioned on adequate evaluation of environmental impacts from EIS and Comp Plan	Comment noted. The Preferred Alternative is a blend of Alternatives 2 and 3.
203	C	2/18/2026	Young, Jim	Recommends clear guardrails to ensure no unmitigated development impact before broadly applying environmental review exemption.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

Final EIS Comment #	Sub-Comment ID	Date of Comment	Commenter	Summary of Comment	Response
203	D	2/18/2026	Young, Jim	Recommends inventory of the city's tree canopy, habitat, ecological connectivity, environmental resources.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."
203	E	2/18/2026	Young, Jim	Opposes blanket environmental review exemption in order to protect critical areas, wetlands, forests, habitat, and riparian areas in neighborhoods. Only supports exemption if development is 100% disturbed and impervious.	See **Section 4.3** Theme response: "Tree canopy and habitat / concern about environmental review."

5 Acronyms and References

5.1 Acronyms

ACS	American Community Survey
ADA	Americans with Disabilities Act
ADU	Accessory Dwelling Unit
AIAN	American Indian and Alaska Native
ALT	Alternative
AMI	Area Median Income
AOP	Air Operating Permits
BIPOC	Black, Indigenous, and People of Color
BMPs	Best Management Practices
BRT	Bus Rapid Transit
CAA	Clean Air Act
CAGR	Compound Annual Growth Rate
CARA	Critical Aquifer Recharge Area
CFCs	chlorofluorocarbons
CIP	Capital Improvement Program
CO	Carbon Monoxide
CPPs	Spokane County Countywide Planning Policies
CSO	Combined Sewer Overflow
DAHP	Department of Archaeology and Historic Preservation, Washington State
DCAs	Drainage Concern Areas
EIS	Environmental Impact Statement
EMS	Emergency Medical Services
EPA	Environmental Protection Agency
ERU	Equivalent Residential Unit
ESD	Employment Security Department, Washington State
FEMA	Emergency Management Agency
GHG	Greenhouse Gas
GMA	Growth Management Act
HAP	Housing Action Plan
HAPT	Housing for All Planning Tool
HB	House Bill
HCM	Highway Capacity Manual
HOV	High Occupancy Vehicle
HPT	High-Performance Transit
ICWP	Integrated Clean Water Plan
IRP	Integrated Resource Plan
LCA	Land Capacity Analysis
LOS	Level of Service
MFTE	Multifamily Tax Exemption
mgd	million gallons per day

MPH	Miles per Hour
N.D.	Not Dated
NAAQS	National Ambient Air Quality Standards
NLCD	National Land Cover Dataset
NO_2	Nitrogen Dioxide
NOC	Notice of Construction
NPDES	National Pollutant Discharge Elimination System
NSC	North Spokane Corridor
NWI	National Wetlands Inventory
O_3	Ozone
OFM	Office of Financial Management, Washington State
PPPH	Persons per Household
PSD	Prevention of Significant Deterioration
PSI	pounds per square inch
RCW	Revised Code of Washington
RDI	Racially Disparate Impacts
RPWRF	Riverside Park Wastewater Reclamation Facility
s.f.	square feet
SMA	Shoreline Management Act
SMC	Spokane Municipal Code
SMP	Shoreline Master Program
SO_2	Sulfur Oxide
SOV	Single Occupancy Vehicle
SR	State Route
SRCAA	Spokane Regional Clean Air Agency
SRTC	Spokane Regional Transportation Council
ST	Street
STA	Spokane Transit Agency
SVI	Social Vulnerability Index
SWAP	Washington State Wildlife Action Plan
TAZ	Transportation Analysis Zones
TDM	Transportation Demand Management
TOD	Transit Oriented Development
U.S., US	United States
USFWS	U.S. Fish and Wildlife Service
V/C	Volume to Capacity
VMT	Vehicle Miles Traveled
WAC	Washington Administrative Code
WDFW	Washington Department of Fish and Wildlife
WRIA	Water Resource Inventory Area
WSDOT	Washington State Department of Transportation

5.2 References

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5.2.2 Air Quality

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