

**STAFF REPORT Z19-504COMP**

Department of Neighborhood and Planning Services

The following staff report concerns a proposed Comprehensive Plan Amendment to the current Comprehensive Plan for the City of Spokane. The proposal constitutes a requested change to the Land Use Plan Map designation and zoning of one or more parcels in the City of Spokane. Amendments to the Comprehensive Plan are enabled by Spokane Municipal Code (SMC) 17G.020 and Revised Code of Washington (RCW) 36.70A.130.

I. PROPERTY SUMMARY

Parcel(s):	25234.0902 and 25234.6501
Address(es):	3004 W 8 th Avenue
Property Size:	2.2 acres
Legal Description:	Lots 1 through 12 of Block 13, Terrace Park Lewis & Shaw's Addition
General Location:	Southwest of the intersection of W 7 th Street and S Audubon Street
Current Use:	Three multi-family residences and open space.

II. APPLICANT SUMMARY

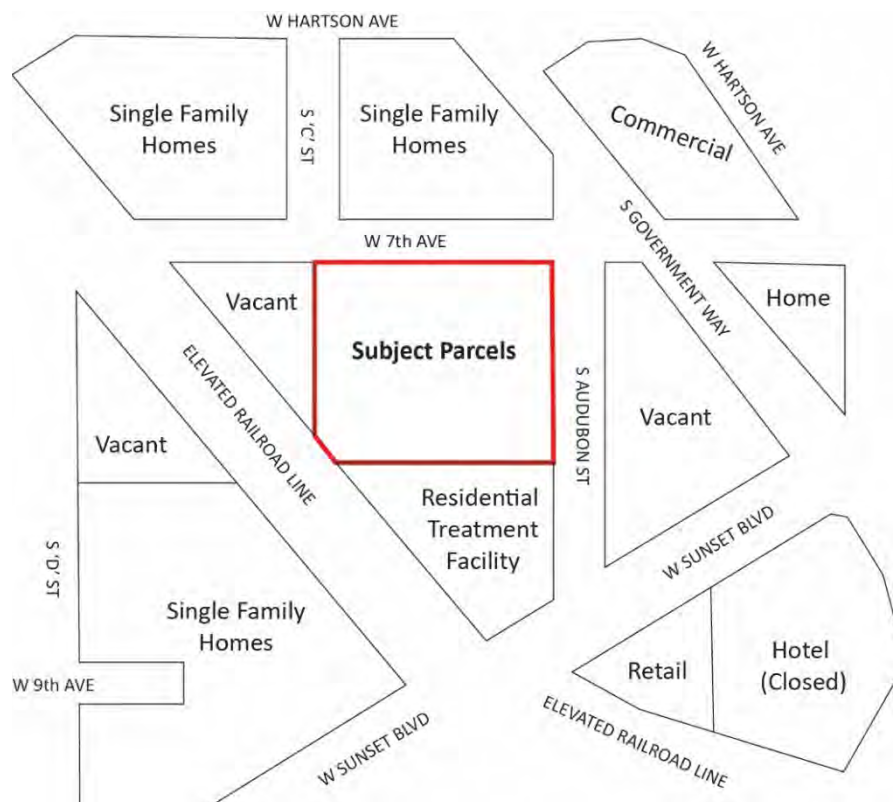
Agent:	Dwight Hume, Land Use Solutions and Entitlement
Applicant:	Sunset Health, LLC
Property Owner:	Sunset Health, LLC

III. PROPOSAL SUMMARY

Current Land Use Designation:	Residential 4-10 DUs/Acre (R 4-10)
Proposed Land Use Designation:	Residential 15-30 DUs/Acre (R 15-30)
Current Zoning:	Residential Single-Family (RSF)
Proposed Zoning:	Residential Multi-Family (RMF)
SEPA Status:	A SEPA threshold Determination of Non-Significance (DNS) was made on August 24, 2020. The appeal deadline is 5:00 PM on September 14, 2020.
Plan Commission Hearing Date:	September 9, 2020
Staff Contact:	Kevin Freibott, Assistant Planner II, kfreibott@spokanecity.org
Staff Recommendation:	None

IV. BACKGROUND INFORMATION

- 1. General Proposal Description:** Pursuant to the procedures established by SMC 17G.020, enabled by RCW 36.70A.130, the applicant asks the City of Spokane to amend the Land Use Plan Map designation (Map LU-1 of the Comprehensive Plan) and zoning designation (Official Zoning Map of the City of Spokane) for two properties located in the West Hills neighborhood. The intent of the applicant is to redevelop the residential care facility immediately south of these parcels and to extend improvements to the subject parcels. However, no development plans have been submitted, nor are any permits or approvals for future development sought by the applicant at this time.
- 2. Site Description and Physical Conditions:** The subject parcels are largely vacant, save for three small multi-family buildings on the southern portion. The site previously contained a mobile home park under a previous owner, but those improvements were removed prior to the submission of this application. There are a number of large trees on or about the property and some remaining patches of paving.
- 3. Property Ownership:** Both parcels, as well as the three parcels located immediately south of the subject parcels, are owned by Sunset Health, LLC, a WA-registered Limited Liability Corporation.
- 4. Adjacent Property Improvements and Uses:** The subject parcels are surrounded by existing development of the following nature:



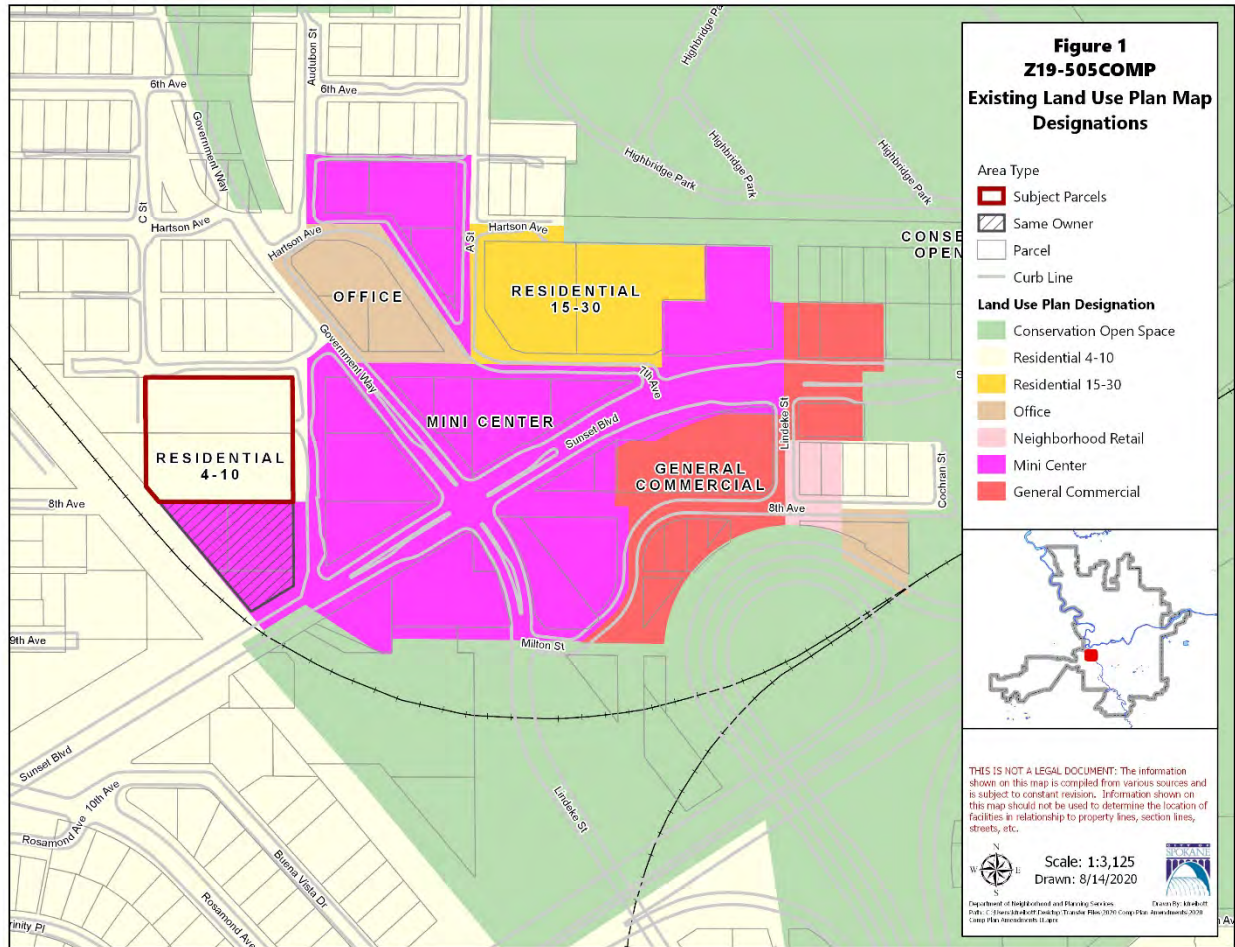
- 5. Street Class Designations:** Both of the adjacent streets, S Audubon St and W 7th Ave are designated as unimproved local streets in the Spokane arterial map. The Comprehensive Plan designates both for future paving/development as local access streets.

6. **Current Land Use Designation and History:** As shown in Exhibit A, the subject properties are currently designated for “Residential 4-10” (between 4 and 10 dwelling units per acre), a designation reserved for single-family homes. The subject properties have been designated for this use since the original adoption of the Growth Management Act (GMA) compliant Comprehensive Plan in 2001.
7. **Proposed Land Use Designation:** As shown in Exhibit B, the proposal is to amend the Land Use Plan Map designation so that the entirety of the subject properties are designated for “Residential 15-30” use.
8. **Current Zoning and History:** The current zoning of the subject properties is Residential Single-Family (RSF). The subject properties have changed zoning designation multiple times in the past. In 1958 the properties were zoned Class I Residential, reserved for single-family homes. By 1975 the properties were zoned B1: Local Business Zone for light intensity commercial uses. By 2006 the properties were zoned for a similarly light intensity commercial use, Neighborhood Retail.

In 2001 the City adopted the current iteration of the Comprehensive Plan. This version of the Comprehensive Plan, which is still substantially similar today, focused density and intensity of use into centers and corridors and limited it elsewhere in the City. In response to this new land use strategy, the City undertook a massive update to the zoning code and residential building standards in the City in order to ensure consistency with the new Comprehensive Plan. This action, completed in 2006, included the rezoning of numerous properties in the City, including the subject properties. In order to help focus density in centers and corridors, this effort included analysis and identification of parcels that contained different physical uses than those allowed in the previous zoning district. For instance, parcels like the subject parcels that were previously zoned for commercial uses but which were vacant or contained low-density residential uses, were identified and rezoned to match the existing use of the property. Accordingly, the subject properties were rezoned from Neighborhood Retail to Single Family Residential (SFR), as they contained a few mobile homes at that time (see Ordinance C33841). Conversely, the two properties to the south that are now in common ownership with the subject properties remained in the NR zoning district, as they contained a motel at that time and didn’t require rezone. Adoption of ordinance C33841 required significant work and included multiple workshops and outreach with the general public, the Plan Commission, and the City Council.

Of additional consideration for this application is the existence of a Neighborhood Mini Center immediately south and east of the subject parcels. This Mini Center, focused on the intersection of Sunset Blvd and Government Way, is surrounded by a complex mix of Land Use Plan Map designations and land improvements. Because this Mini Center has bearing on the policy ramifications of the proposed amendment, **Figure 1** has been provided on the next page showing the various Land Use Plan Map Designations surrounding the Mini Center.

9. **Proposed Zoning:** As shown in Exhibit D, the proposal seeks to amend the zoning so that the entirety of the subject properties are zoned Residential Multi-Family (RMF).



V. APPLICATION PROCESS AND PUBLIC COMMENT

- Key Steps:** The application is being processed according to SMC 17G.060, including the following steps:

Application Submitted	October 29, 2019
Threshold Application Certified Complete	November 27, 2019
Council Threshold Subcommittee Established ¹	January 13, 2020
Council Threshold Subcommittee Met	February 6, 2020
Annual Work Program Set ²	March 2, 2020
Agency/Department Comment Period Ended	May 11, 2020
Notice of Application Posted	June 8, 2020

¹ Spokane City Council Resolution 2020-0002

² Spokane City Council Resolution 2020-0014

Plan Commission Workshop July 8, 2020
60-Day Public Comment Period Ended August 7, 2020
SEPA Determination Issued August 24, 2020
Notice of Public Hearing Posted August 26, 2020
Plan Commission Hearing Date (Scheduled) September 9, 2020

- 2. Comments Received:** A request for comments was issued to City departments, local agencies, and neighborhood councils within 400 feet of the proposal, along with pertinent application details on April 24, 2020. By the close of agency comment on May 11, comments were received from the following:

- Randy Abrahamson, Spokane Tribe Historic Preservation Officer
- Karen Carlberg, Chair of the West Hills Neighborhood

Mr. Abrahamson expressed concerns that the project site may include cultural resources and asked that any future development conduct a cultural survey and sub-surface testing. Mrs. Carlberg provided some comments/corrections for the SEPA checklist and requested that in the future the City update its process/standards for Comprehensive Plan amendments to provide a greater level of information and coordinate with neighborhoods. Both comment letters are included in **Exhibit L** of this staff report.

Following the agency/department comment period, a Notice of Application was issued on June 8, 2020 by mail to all properties and owners within a 400-foot radius of the subject properties, including within 400-feet of any adjacent properties with the same ownership. Notice was also posted on the subject properties, in the closest library branch, and in the Spokesman Review. The following comments were received during the 60-day public comment period:

- Scott Kappes

Mr. Kappes, an adjacent property owner, provided several comments, including the need for paving of adjacent dirt roads, concerns with stormwater runoff, inclusion of open space/greenspace for the use of local birds and wildlife on the property, and the requirement that the project use a vegetated screen between the eventual improvements to the property and the adjacent home. It's of note that [SMC 17C.200](#) provides requirements for landscaping and screening between uses. Any future development of the site would be required to meet these standards before approval. However, the proposal does not currently include any plans or permits for the actual development/improvement of the property. Those requirements would be applied in the future, if and when the property owner decides to develop.

- 3. Public Workshop:** A public workshop with the Spokane Plan Commission was held on July 8, 2020, during which the particulars of the proposal were presented to the Plan Commission for their consideration and discussion. The applicant was given an opportunity to speak but was unable to participate during the workshop.

VI. APPLICATION REVIEW AND ANALYSIS

1. **Guiding Principles:** SMC 17G.020.010 provides the following guiding principles for the annual comprehensive plan amendment process:

- A. Keep the comprehensive plan alive and responsive to the community.
- B. Provide for simultaneous review of proposals to allow for cumulative impact analysis of all applications on a City-wide basis and in conjunction with budget decisions.
- C. Make map adjustments based on a foundation in policy language, consistently applying those concepts citywide.
- D. Honor the community's long-term investment in the comprehensive plan, through public participation and neighborhood planning processes, by not making changes lightly.
- E. Encourage development that will enable our whole community to prosper and reinforce our sense of place and feeling of community, in an ecologically, economically and socially sustainable manner.
- F. Amendments to the comprehensive plan must result in a net benefit to the general public.

2. **Review Criteria:** SMC 17G.020.030 provides a list of considerations that are to be used, as appropriate, by the applicant in developing an amendment proposal, by planning staff in analyzing a proposal, by the plan commission and by the city council in making a decision on the proposal. Following each consideration is staff analysis relative to the amendment requested.

- A. **Regulatory Changes:** *Amendments to the comprehensive plan must be consistent with any recent state or federal legislative actions, or changes to state or federal regulations, such as changes to the Growth Management Act, or new environmental regulations.*

Staff Analysis: Staff reviewed and processed the proposed amendment under the most current regulations contained in the Growth Management Act, the Washington State Environmental Policy Act (SEPA), and the Spokane Municipal Code. Staff is unaware of any recent federal, state, or legislative actions with which the proposal would be in conflict, and no comments were received to this effect from any applicable agencies receiving notice of the proposal.

The proposal meets this criterion.

- B. **GMA:** *The change must be consistent with the goals and purposes of the State Growth Management Act.*

Staff Analysis: The Growth Management Act (GMA) details 13 goals to guide the development and adoption of the comprehensive plans and development regulations (RCW 36.70A.020, "Planning Goals"), and these goals guided the City's development of its comprehensive plan and development regulations. No comments received or other evidence in the record indicates inconsistency between the proposed plan map amendment and the goals and purposes of the GMA.

The proposal meets this criterion.

- C. Financing:** *In keeping with the GMA's requirement for plans to be supported by financing commitments, infrastructure implications of approved comprehensive plan amendments must be reflected in the relevant six-year capital improvement plan(s) approved in the same budget cycle.*

Staff Analysis: The City did not require, nor did any Agency comment request or require a traffic impact analysis for the proposal. The subject property is already served by water, sewer, nearby transit service, and adjacent existing City streets. Furthermore, under State and local laws, any subsequent development of the site will be subject to a concurrency determination pursuant to SMC 17D.010.020.

The proposal meets this criterion.

- D. Funding Shortfall:** *If funding shortfalls suggest the need to scale back on land use objectives and/or service level standards, those decisions must be made with public input as part of this process for amending the comprehensive plan and capital facilities program.*

Staff Analysis: No evidence of a potential funding shortfall as a result of this proposal exists.

The proposal meets this criterion.

E. Internal Consistency:

- The requirement for internal consistency pertains to the comprehensive plan as it relates to all of its supporting documents, such as the development regulations, capital facilities program, shoreline master program, downtown plan, critical area regulations, and any neighborhood planning documents adopted after 2001. In addition, amendments should strive to be consistent with the parks plan, and vice versa. For example, changes to the development regulations must be reflected in consistent adjustments to the goals or policies in the comprehensive plan. As appropriate, changes to the map or text of the comprehensive plan must also result in corresponding adjustments to the zoning map and implementation regulations in the Spokane Municipal Code.*

Staff Analysis: The proposal is internally consistent with applicable supporting documents of the Comprehensive Plan as follows:

Development Regulations. As a non-project proposal, there are no specific plans for development of this site. Additionally, any future development on this site will be required to be consistent with the current development regulations at the time an application is submitted. The proposal does not result in any non-conforming uses or development and staff finds no reason to indicate that the proposed Comprehensive Plan Land Use Plan Map and zone change would result in a property that cannot be reasonably developed in compliance with applicable regulations.

Capital Facilities Program. As described in the staff analysis of Criterion C above, no additional infrastructure or capital expenditures by the City are anticipated for this non-project action, and it is not anticipated that the City's integrated Capital Facilities Program would be affected by the proposal.

Neighborhood Planning Documents Adopted after 2001. The West Hills neighborhood completed its initial neighborhood planning project in 2016. This planning effort was centered on the stretch of Fort George Wright Drive adjacent to the Spokane Falls Community College, far from the subject parcels, and would not affect or be affected by this proposal.

Miscellaneous Comprehensive Plan Goals and Policies. Staff have compiled a list of Comprehensive Plan Goals and Policies which bear on the proposal in Exhibit H of this report. Further discussion of these policies is provided under section K.2 below.

See Item K.2 for below for analysis and results.

2. *If a proposed amendment is significantly inconsistent with current policy within the comprehensive plan, an amendment proposal must also include wording that would realign the relevant parts of the comprehensive plan and its other supporting documents with the full range of changes implied by the proposal.*

Staff Analysis: See item K.2 below for analysis and results.

The consistency of the proposal with this criterion is unclear. See criterion K.2 below.

- F. Regional Consistency:** *All changes to the comprehensive plan must be consistent with the countywide planning policies (CWPP), the comprehensive plans of neighboring jurisdictions, applicable capital facilities or special district plans, the regional transportation improvement plan, and official population growth forecasts.*

Staff Analysis: No evidence has been provided by any adjacent jurisdiction, including the County of Spokane, indicating this proposal would conflict with the CWPP or the plans of any neighboring jurisdiction. The proposed change in land use designations affects a relatively small area within an existing urbanized area, with no foreseeable implications to regional or inter-jurisdictional policy issues.

The proposal meets this criterion.

- G. Cumulative Effect:** *All amendments must be considered concurrently in order to evaluate their cumulative effect on the comprehensive plan text and map, development regulations, capital facilities program, neighborhood planning documents, adopted environmental policies and other relevant implementation measures.*

1. **Land Use Impacts:** *In addition, applications should be reviewed for their cumulative land use impacts. Where adverse environmental impacts are identified, mitigation requirements may be imposed as a part of the approval action.*
2. **Grouping:** *Proposals for area-wide rezones and/or site-specific land use plan map amendments may be evaluated by geographic sector and/or land use type in order to facilitate the assessment of their cumulative impacts.*

Staff Analysis: The City is concurrently reviewing this application and eight other applications for Comprehensive Plan amendments, as part of an annual plan amendment cycle. Six applications are for Land Use Plan Map amendments, two are proposed

transportation map amendments to the Comprehensive Plan, and one is a proposed text amendment. When considered together, these various applications do not interact, nor do they augment or detract from each other. The cumulative effects of these various applications are minor.

This proposal meets this criterion.

H. SEPA: *SEPA³ Review must be completed on all amendment proposals and is described in Chapter 17E.050.*

1. **Grouping:** *When possible, the SEPA review process should be combined for related land use types or affected geographic sectors in order to better evaluate the proposals' cumulative impacts. This combined review process results in a single threshold determination for those related proposals.*
2. **DS:** *If a determination of significance (DS) is made regarding any proposal, that application will be deferred for further consideration until the next applicable review cycle in order to allow adequate time for generating and processing the required environmental impact statement (EIS).*

Staff Analysis: The application is under review in accordance with the State Environmental Policy Act (SEPA), which requires that the potential for adverse environmental impacts resulting from a proposal be evaluated during the decision-making process. On the basis of the information contained in the environmental checklist, written comments from local and State departments and agencies concerned with land development within the City, and a review of other information available to the Director of Planning Services, a Determination of Non-Significance was issued on August 24, 2020.

The proposal meets this criterion.

- I. **Adequate Public Facilities:** *The amendment must not adversely affect the City's ability to provide the full range of urban public facilities and services (as described in CFU 2.1 and CFU 2.2) citywide at the planned level of service, or consume public resources otherwise needed to support comprehensive plan implementation strategies.*

Staff Analysis: The proposal would change the land-use designation of an urban area already served by the public facilities and services described in CFU 2.1. The proposed change in land-use designations affects a relatively small area and does not measurably alter demand for public facilities and services in the vicinity of the site or on a citywide basis. Any subsequent development of the site will be subject to a concurrency determination pursuant to SMC 17D.010.020, thereby implementing the policy set forth in CFU 2.2.

The proposal meets this criterion.

³ State Environmental Policy Act

- J. **UGA:** *Amendments to the urban growth area boundary may only be proposed by the city council or the mayor of Spokane and shall follow the procedures of the countywide planning policies for Spokane County.*

Staff Analysis: The proposal does not include an expansion to the UGA, thus this criteria does not apply.

The proposal meets this criterion.

K. **Demonstration of Need:**

1. **Policy Adjustments:** *Proposed policy adjustments that are intended to be consistent with the comprehensive plan should be designed to provide correction or additional guidance so the community's original visions and values can better be achieved. The need for this type of adjustment might be supported by findings from feedback instruments related to monitoring and evaluating the implementation of the comprehensive plan.*

Staff Analysis: The proposal does not include a policy adjustment, thus this criteria does not apply.

The proposal meets this criterion.

2. **Map Changes:** *Changes to the land use plan map (and by extension, the zoning map) may only be approved if the proponent has demonstrated that all of the following are true:*

- a. The designation is in conformance with the appropriate location criteria identified in the comprehensive plan (e.g. compatibility with neighboring land uses, proximity to arterials, etc.);

Staff Analysis: The primary Comprehensive Plan policy which applies to the proposal is Land Use LU 1.4, Higher Density Residential Uses, which directs “new higher density residential uses to Centers and Corridors designated on the Land Use Plan Map.” The subject parcels are located immediately adjacent to a designated Mini-Center on the Land Use Plan Map. Accordingly, it is also important to review the requirements of policy LU 1.7, Neighborhood Mini-Centers. According to Policy LU 1.7, mini centers could be considered to be “outside Centers and Corridors.” However, LU 1.7 also states, “Mini-Center locations are encouraged to become small, mixed-use centers with higher density residential use as a major component.” The current mini-center at Government Way and Sunset Blvd already includes Neighborhood Retail, Community Business, and some Residential Multi-Family zoning, all of which would allow higher density residential uses. However, this neighborhood mini-center has not seen any significant retail or commercial development since the adoption of the 2006 Comprehensive Plan.

While Policy LU 1.4 provides for some opportunity to establish new higher density residential uses *outside* centers, it generally limits such additions to areas where the predominant development character is already multi-family in nature. As the subject properties are substantially surrounded by vacant land, single-family

residential, and only limited multi-family residential, this proposal is potentially inconsistent with this policy. It is unclear if this proposal meets the policy intention of Policy LU 1.7, Neighborhood Mini Centers and Policy LU 1.4, Higher Density Residential.

This proposal's consistency with the requirements of LU 1.4 and LU 1.7 is unclear, as described above.

- b. The map amendment or site is suitable for the proposed designation.

Staff Analysis: There exist no physical features of the site or its surroundings that would preclude physical development of office uses on the site. The site is adequately served by all utilities and by two major arterial streets, bus service is nearby, and the site is generally level and devoid of critical areas.

- c. The map amendment implements applicable comprehensive plan policies and subarea plans better than the current map designation.

Staff Analysis: As discussed in item a. above, the proposal may implement the desire for greater residential density in the vicinity of mini centers.

The proposal's consistency with this criterion is unclear.

- 3. **Rezones, Land Use Plan Amendment:** *Corresponding rezones will be adopted concurrently with land use plan map amendments as a legislative action of the city council. If policy language changes have map implications, changes to the land use plan map and zoning map will be made accordingly for all affected sites upon adoption of the new policy language. This is done to ensure that the comprehensive plan remains internally consistent and to preserve consistency between the comprehensive plan and supporting development regulations.*

Staff Analysis: If the Land Use Plan Map amendment is approved as proposed, the zoning designation of the subject property will change concurrently from RSF (Residential Single-Family) to RMF (Residential Multi-Family).

The proposal meets this criterion.

VII. CONCLUSION

The proposal has been processed and considered according to the requirements of the Spokane Municipal Code. According to the information provided above and the whole of the administrative record, the proposal's consistency with criteria for a comprehensive plan amendment as provided in SMC 17G.020.030 is unclear.

Following the close of public testimony and deliberations regarding conclusions with respect to the review criteria and decision criteria detailed in SMC Chapter 17G.020, Plan Commission will need to make a recommendation to City Council for approval or denial of the requested amendment to the Land Use Plan map of the City's Comprehensive Plan.

VIII. STAFF RECOMMENDATION

Because the consistency of this proposal with a policy of the Comprehensive plan is unclear, staff does not have a recommendation regarding this application.

IX. LIST OF EXHIBITS

- | | |
|----------------------------------|---|
| A. Existing Land Use Plan Map | H. List of Relevant Comp Plan Policies |
| B. Proposed Land Use Plan Map | I. Application Materials |
| C. Existing Zoning Map | J. SEPA Checklist |
| D. Proposed Zoning Map | K. SEPA Determination of Non-Significance |
| E. Application Notification Area | L. Agency Comments |
| F. Detail Aerial | M. Public Comments |
| G. Wide-Area Aerial | |



Z19-504COMP (3004 W 8th Ave)

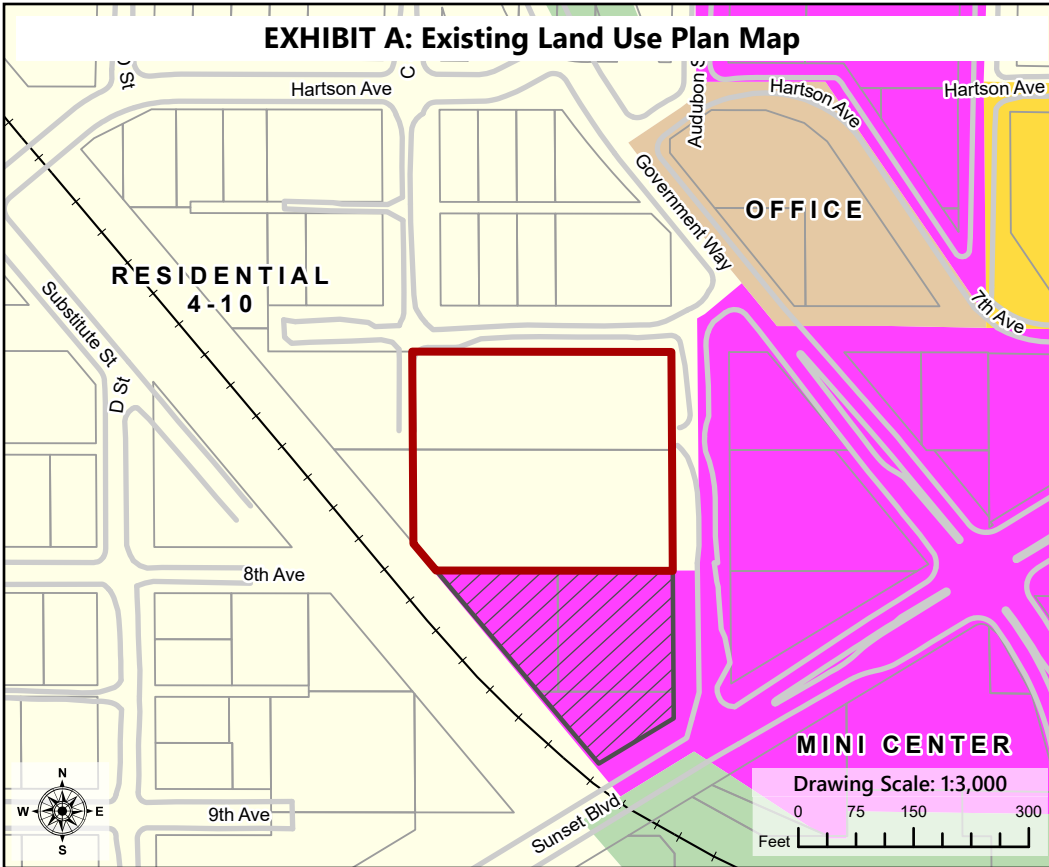
2019/2020 Comprehensive Plan Amendment Proposals

Drawn: 11/27/2019

THIS IS NOT A LEGAL DOCUMENT

The information shown on this map is compiled from various sources and is subject to constant revision. Information shown on this map should not be used to determine the location of facilities in relationship to property lines, section lines, streets, etc.

EXHIBIT A: Existing Land Use Plan Map



Legend

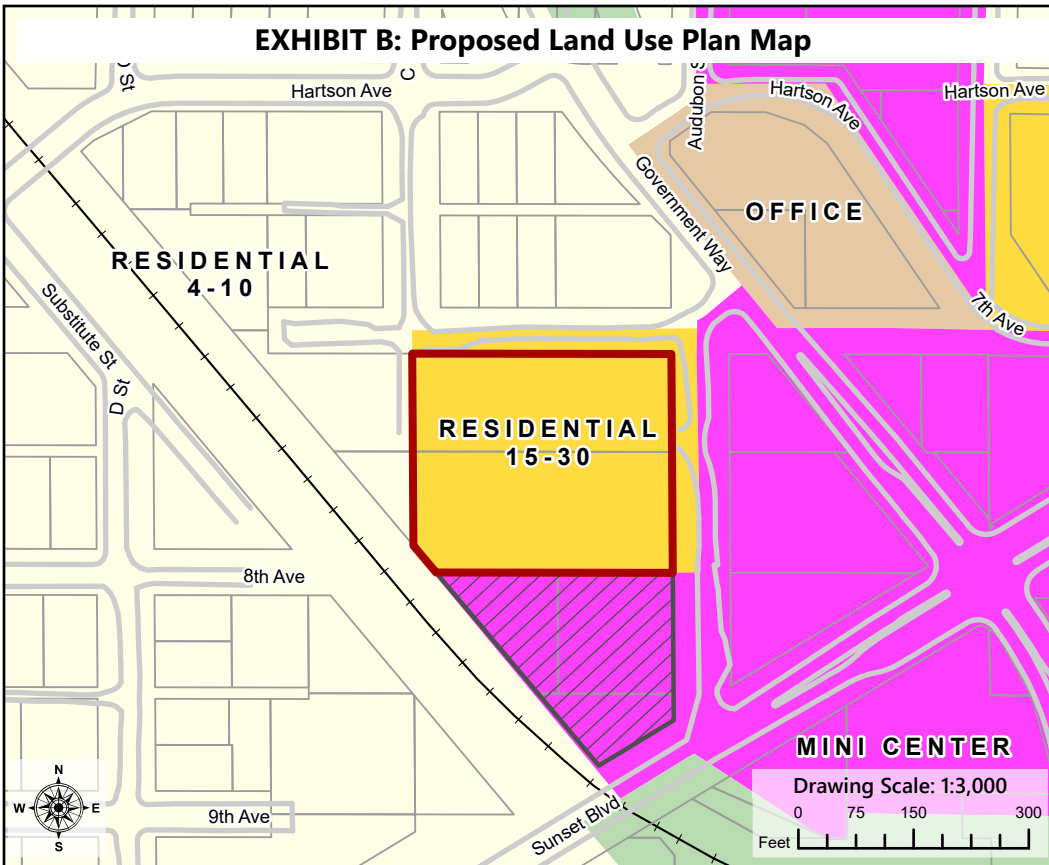
- Subject Parcels
- Same Owner
- Parcel
- Curb Line

Land Use Plan Designation

- Conservation Open Space
- Residential 4-10
- Residential 15-30
- Office
- Mini Center

Acres (Proposal): 2.20

EXHIBIT B: Proposed Land Use Plan Map

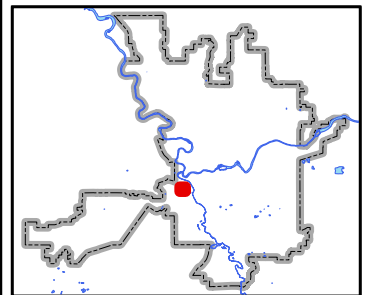


- Subject Parcels
- Same Owner
- Parcel
- Curb Line

Proposed Land Use

- Conservation Open Space
- Residential 4-10
- Residential 15-30
- Office
- Mini Center

PROJECT LOCATION



Neighborhood and Planning Services
Drawn By: Kevin Freibott



Z19-504COMP (3004 W 8th Ave)

2019/2020 Comprehensive Plan Amendment Proposals

Drawn: 11/27/2019

THIS IS NOT A LEGAL DOCUMENT

The information shown on this map is compiled from various sources and is subject to constant revision. Information shown on this map should not be used to determine the location of facilities in relationship to property lines, section lines, streets, etc.

Legend

- Subject Parcels
- Same Owner
- Curb Line
- Parcel
- Railroad

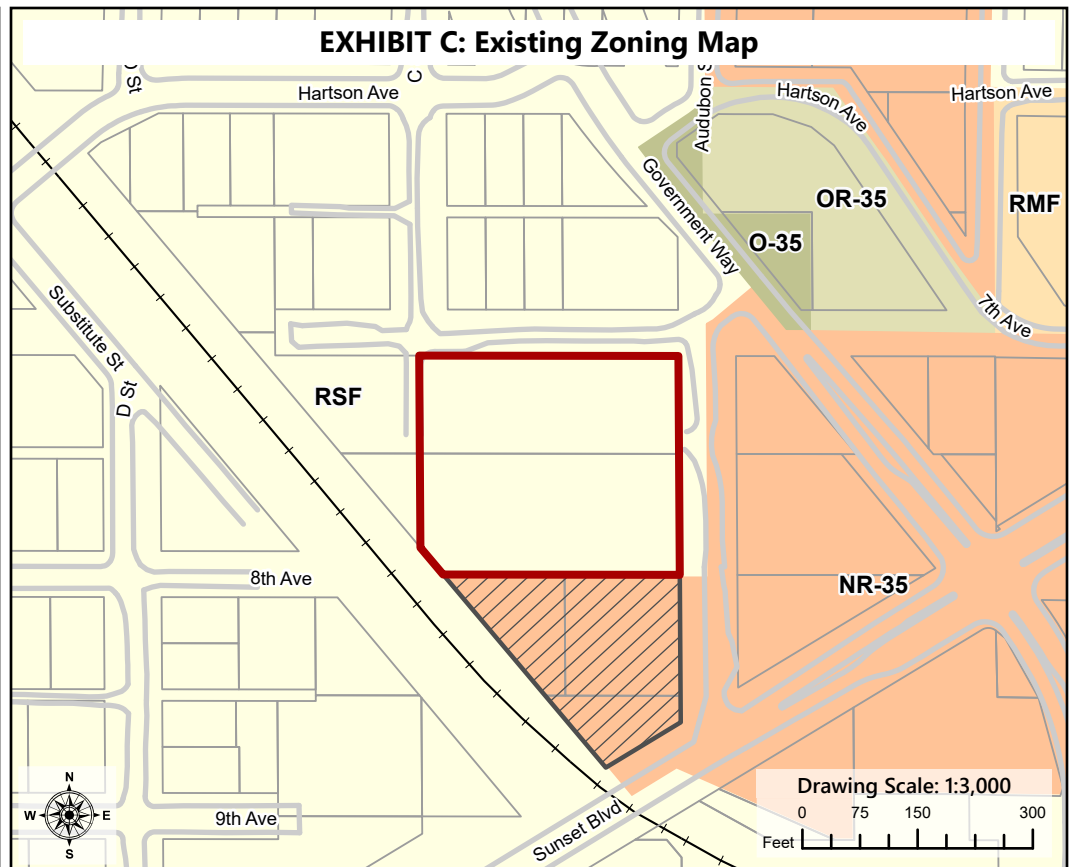
Current Zoning

- Neighborhood Retail (NR)
- Office (O)
- Office Retail (OR)
- Residential Multifamily (RMF)
- Residential Single-Family (RSF)

Numbers after a Zone Label denote the height limits in that area.

Acres (Proposal): 2.20

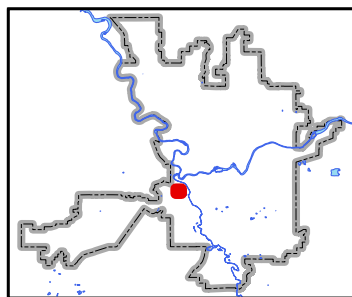
EXHIBIT C: Existing Zoning Map



Legend

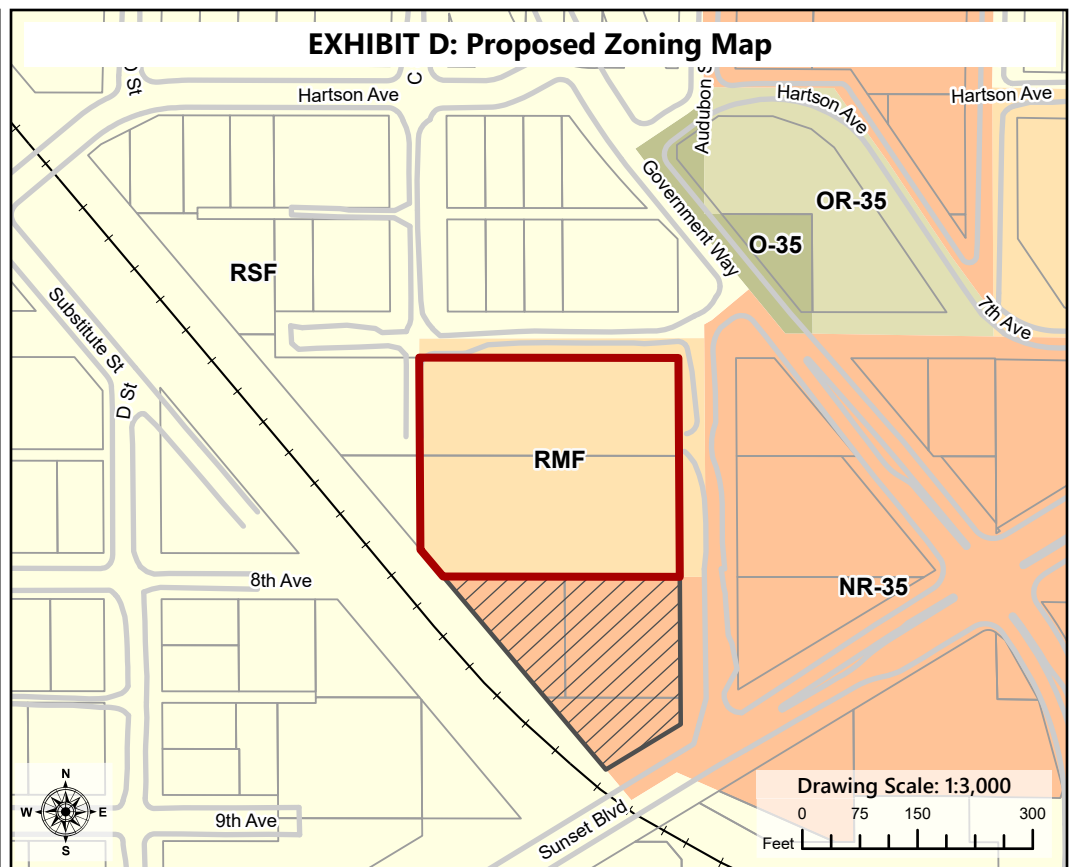
- Subject Parcels
 - Same Owner
 - Curb Line
 - Parcel
- ## Proposed Zoning
- Neighborhood Retail (NR)
 - Office (O)
 - Office Retail (OR)
 - Residential Multifamily (RMF)
 - Residential Single-Family (RSF)

PROJECT LOCATION



Neighborhood and Planning Services
Drawn By: Kevin Freibott

EXHIBIT D: Proposed Zoning Map

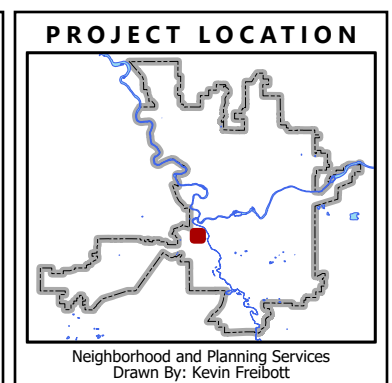
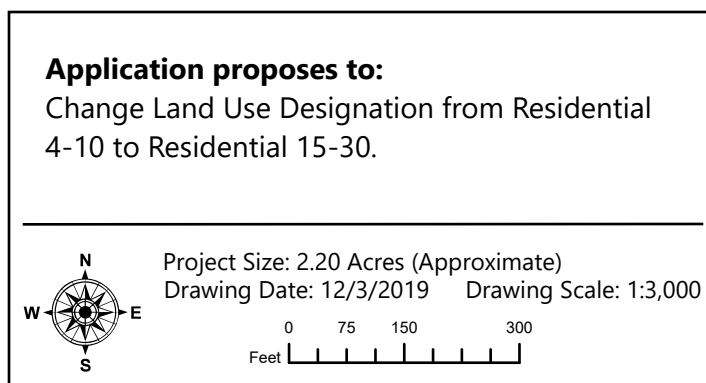
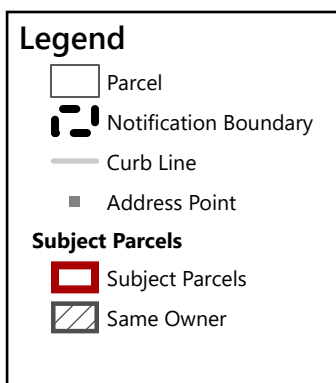
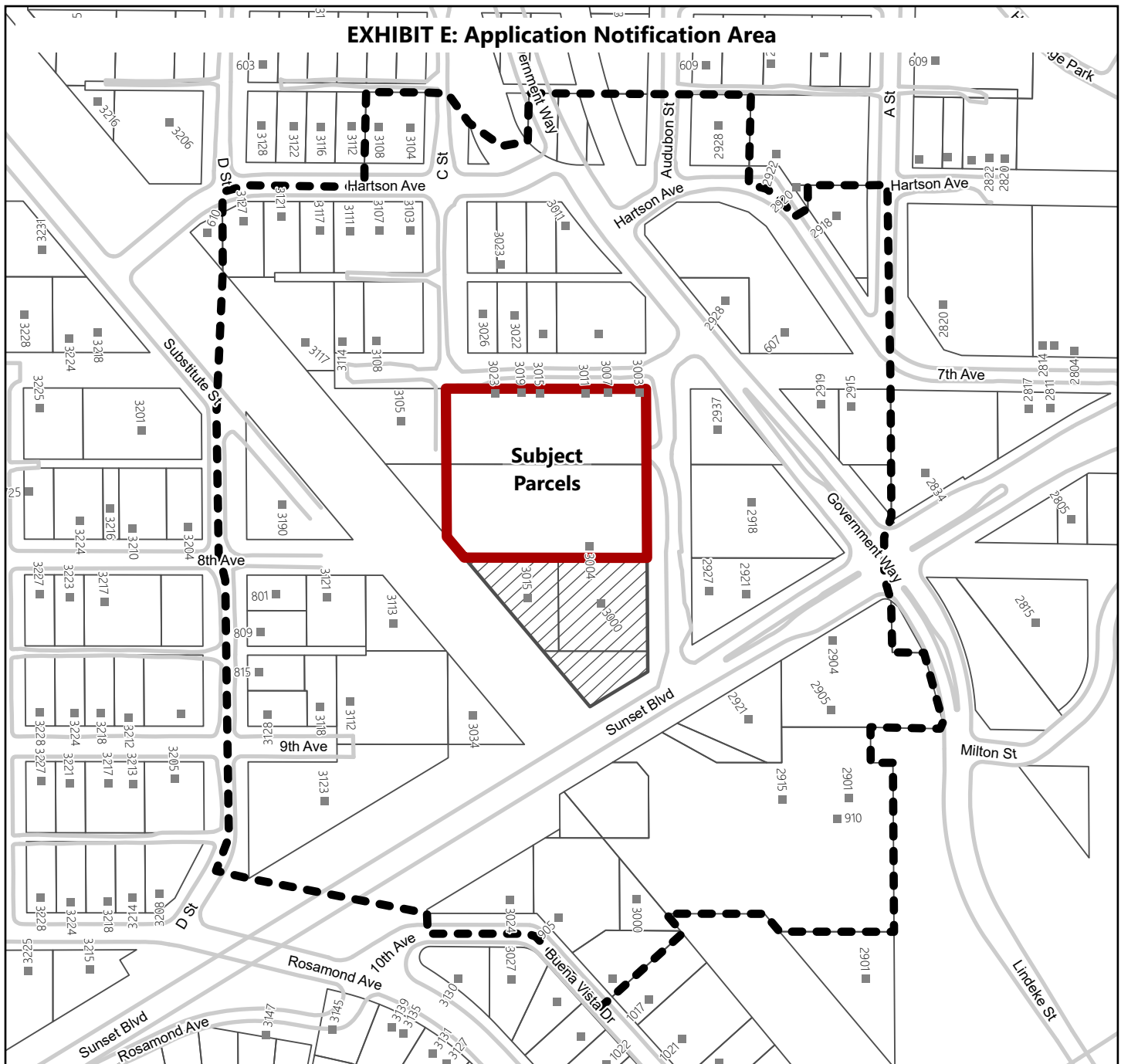




Z19-504COMP
(3004 W 8th Ave)

2019/2020 Comprehensive Plan Amendment Proposals

THIS IS NOT A LEGAL DOCUMENT: The information shown on this map is compiled from various sources and is subject to constant revision. Information shown on this map should not be used to determine the location of facilities in relationship to property lines, section lines, streets, etc.





Z19-504COMP (3004 W 8th Ave)

2019/2020 Comprehensive Plan Amendment Proposals

Drawn: 12/5/2019

THIS IS NOT A LEGAL DOCUMENT

The information shown on this map is compiled from various sources and is subject to constant revision. Information shown on this map should not be used to determine the location of facilities in relationship to property lines, section lines, streets, etc.

EXHIBIT F: Detail Aerial



Legend

Subject Parcels

Adjacent Ownership

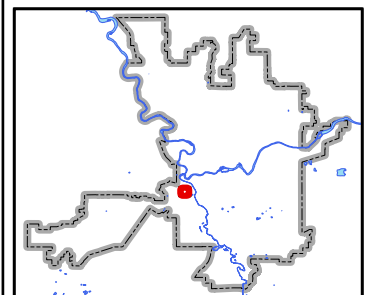
Aerial Photograph Taken
on 4/3/2018

Acres (Proposal): 2.20

EXHIBIT G: Wide-Area Aerial



PROJECT LOCATION



Neighborhood and Planning Services
Drawn By: Kevin Freibott



The following policies of the Comprehensive Plan relate to application Z19-504COMP. The full text of the Comprehensive Plan can be found at www.shapingspokane.org.

Chapter 3—Land Use

LU 1.3 Single-Family Residential Areas

Protect the character of single-family residential neighborhoods by focusing higher intensity land uses in designated Centers and Corridors.

Discussion: The city's residential neighborhoods are one of its most valuable assets. They are worthy of protection from the intrusion of incompatible land uses. Centers and Corridors provide opportunities for complementary types of development and a greater diversity of residential densities. Complementary types of development may include places for neighborhood residents to work, shop, eat, and recreate. Development of these uses in a manner that avoids negative impacts to surroundings is essential. Creative mechanisms, including design standards, must be implemented to address these impacts so that potential conflicts are avoided.

LU 1.4 Higher Density Residential Uses

Direct new higher density residential uses to Centers and Corridors designated on the Land Use Plan Map.

Discussion: Higher density housing of various types is the critical component of a center. Without substantially increasing population in a center's immediate vicinity, there is insufficient market demand for goods and services at a level to sustain neighborhood-scale businesses. Higher density residential uses in Centers range from multi-story condominiums and apartments in the middle to small-lot homes at the edge. Other possible housing types include townhouses, garden apartments, and housing over retail space.

To ensure that the market for higher density residential use is directed to Centers, future higher density housing generally is limited in other areas. The infill of Residential 15+ and Residential 15-30 residential designations located outside Centers are confined to the boundaries of existing multi-family residential designations where the existing use of land is predominantly higher density residential.

LU 1.7 Neighborhood Mini-Centers

Create a Neighborhood Mini-Center wherever an existing Neighborhood Retail area is larger than two acres.

Discussion: The Neighborhood Mini-Center designation recognizes the existence of small neighborhood-serving businesses in locations that are two to five acres in size that lie outside Centers and Corridors designated on the Land Use Plan Map. However, some designated Neighborhood Mini-Centers are over five acres in size because they are based on pre-existing zoning

designations. Similar to Neighborhood Retail, the Neighborhood Mini-Center designation consists of small, freestanding businesses usually sited at the intersection of or along arterial streets. Another characteristic of this designation is the greatly restricted potential for redevelopment of the surrounding area to support a full Neighborhood Center. Consequently, the Mini-Center designation limits mixed-use development to the boundaries of the existing Mini-Center designation.

Mini-Center locations are encouraged to become small, mixed-use centers with higher density residential use as a major component. Residential use adds market demand for neighborhood business and enables enhanced transit service to these locations. Shared-use parking arrangements are encouraged to increase the development intensity of the site for both residential and commercial uses.

This designation allows the same uses as the Neighborhood Retail designation. No new drive-through facilities, including gas stations and similar auto-oriented uses, should be allowed except along principal arterial streets where they should be subject to size limitations and design guidelines. Buildings should be oriented to the street to encourage walking by providing easy pedestrian connections. Parking lots should not dominate the frontage and should be located behind or on the side of buildings.

New Mini-Center locations may be established through a neighborhood planning process. They should be separated by at least one-mile from other neighborhood serving business areas and should not exceed five acres in size. To provide convenient accessibility from the surrounding neighborhood, new Mini-Centers should be located at the intersection of arterial streets.

LU 5.5 Compatible Development

Ensure that infill and redevelopment projects are well-designed and compatible with surrounding uses and building types.

Chapter 6—Housing

H 1.4 Use of Existing Infrastructure

Direct new residential development into areas where community and human public services and facilities are available.

Discussion: Using existing services and infrastructure often reduces the cost of creating new housing. New construction that takes advantage of existing services and infrastructure conserves public resources that can then be redirected to other needs such as adding amenities to these projects

H 1.11 Access to Transportation

Encourage housing that provides easy access to public transit and other efficient modes of transportation.

Discussion: Transportation is the second largest expenditure after housing and can range from 10 to 25 percent of household expenditures. Examining where housing is City of Spokane Comprehensive Plan 6-8 located and the associated transportation costs may provide a more realistic evaluation of housing affordability in the future.

H 2.4 Linking Housing with Other Uses

Ensure that plans provide increased physical connection between housing, employment, transportation, recreation, daily-needs services, and educational uses.

Discussion: The location of housing in relation to other land uses is a part of what determines the quality of housing. The desirability and viability of housing changes for different segments of the community, based on an area's mix of land uses. As complementary land uses become spread further apart, transportation options decrease while transportation costs increase. These added transportation costs reduce the amount of household income available for housing and other household needs. This affects lower-income households first. In urban areas, basic services, such as grocery stores, public transportation, and public parks, should be available within a mile walk of all housing.

Chapter 11—Neighborhoods

N 8.4 Consistency of Plans

Maintain consistency between neighborhood planning documents and the comprehensive plan.

Discussion: Neighborhood planning shall be conducted within the framework of the comprehensive plan, and further, the Growth Management Act requires that these plans be consistent with the comprehensive plan.

Land Use Solutions & Entitlement

Land Use Planning Services

9101 N. MT. VIEW LANE Spokane, WA 99218

509-435-3108 (V)

dhume@spokane-landuse.com

10-23-19

Kevin Freibott, Planner II
Planning & Development Services
3rd Floor City Hall
West 801 Spokane Falls Blvd.
Spokane WA 99201

Ref: Sunset Health LLC Map Amendment Request


Dear Kevin:

I am encouraged to report that the former Ventura Land Holdings application is finally on solid ground with the transfer of ownership to Empire Health Foundation and its subsidiary Sunset Health LLC, the new applicant for the amendment previously sought by Ventura Land Holdings and others. More importantly, I have learned that the former services of Ascenda have been retained, as has the long-range goal of improving the housing accommodations for existing residents of the Ascenda program, currently housed in the existing motel.

Submitted herewith is the required application forms, a map of the subject amendment, the check in the amount of \$500.00 and a copy of the minutes from the April 2019 West Hills meeting in which Ascenda attended the meeting to explain the future plans for this project, once approved.

I am confident that this application will be pursued to its completion now that the other idiosyncrasies have passed.

Respectfully Submitted



Dwight J Hume

Copy w/enclosures:
Sunset Health LLC c/o Jeff Bell, Interim President, Empire Health Foundation



DESCRIPTION OF PROPOSAL:

Amend Land Use Plan Map from R 4-10 to R 15-30 and zone from RSF to RMF

ADDRESS OF SITE OF PROPOSAL: (if not assigned yet, obtain address from Public Works before submitting application)
3004 W 8th Avenue

APPLICANT:

Name: Sunset Health LLC, C/O Jeff Bell
Address: 1020 W Riverside Ave. Spokane WA 99201
Phone (home): **Phone (work):**
Email address: jeff@empirehealthfoundation.org

PROPERTY OWNER:

Name: Same
Address:
Phone (home): **Phone (work):**
Email address:

AGENT:

Name: Land Use Solutions & Entitlement C/O Dwight Hume
Address: 9101 N Mt. View Lane, Spokane WA 99218
Phone (home): **Phone (work):** 509-435-3108
Email address: dhume@spokane-landuse.com

ASSESSOR'S PARCEL NUMBERS:

25234.6501 25234.0902

LEGAL DESCRIPTION OF SITE:

Lots 1-12, Block 13, Terrace Park Lewis and Shaws and the E 1/2 of vacated "C" street.

SIZE OF PROPERTY:

2.20 acres

LIST SPECIFIC PERMITS REQUESTED IN THIS APPLICATION:

Land Use Map Amendment and Zone Change from R 4-10 to R-15-30 and from RSF to RMF zone

SUBMITTED BY:

Dwight Hume
☐ Applicant ☐ Property Owner ☐ Property Purchaser ☒ Agent

In the case of discretionary permits (administrative, hearing examiner, landmarks commission or plan commission), if the applicant is not the property owner, the owner must provide the following acknowledgement:

I, Jeff Bell, managing partner of Sunset Health LLC, owners of the above-described property do hereby authorize Dwight J Hume to represent us and our interests in all matters regarding this application.

ACKNOWLEDGMENT:

STATE OF WASHINGTON)
) ss.
COUNTY OF SPOKANE)

On this 21st day of OCTOBER, 2019, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared JEFF BELL, to me known to be the individual that executed the foregoing instrument and acknowledged the said instrument to be free and his/her free and voluntary act and deed, for the uses and purposes therein mentioned.

Witness my hand and official seal hereto affixed the day and year first above written.



Kelly Knutson
Notary Public in and for the State of Washington,
residing at SPOKANE, WA 99208



Comprehensive Plan Amendments

Threshold Review

Sunset Health LLC Map Amendment R 6-10 to R 15-30

Pre-application:

The first step in applying for an amendment to the City's Comprehensive Plan is to submit a threshold review application. Prior to submitting this application, a private applicant is required to schedule a no-fee pre-application conference with staff. In the case of a map amendment, the applicant is also required to make reasonable efforts to schedule a meeting with the appropriate neighborhood council(s) and document any support or concerns expressed by the neighborhood council(s). Applications are accepted through October 31 each year, during business hours. Applicants are strongly encouraged to make an appointment with Planning Department staff prior to submitting an application.

Description of the Proposed Amendment:

- In the case of a proposed text amendment, please describe the proposed amendment and provide suggested amendment language.
- In the case of a map amendment, please describe using parcel number(s), address, and a description including size, and maps.
25234.1201, 1206 and 1207. 2.2 acres bounded by 7th Avenue, Govt. Way and vacated 8th Avenue, 3004 W 8th Avenue. (See attached map).

In addition to describing the proposal, please describe how your applications satisfies the threshold review criteria in SMC 17G.020.026, which are restated below. You may need to use a separate piece of paper.

1. Describe how the proposed amendment is appropriately addressed as a Comprehensive Plan Amendment.
The Comprehensive Plan provides guidance on the proper location of higher density residential. The subject property is located adjacent to an existing NR-35 zone which implements a mini-neighborhood center. Within the discussion of a Neighborhood Mini-Center, it mentions that higher density residential is encouraged in those areas. This is an area characterized by several apartment developments within the immediate vicinity as well as office uses.
2. The proposed amendment does not raise policy or land use issues that are more appropriately addressed by an ongoing work program approved by the City council or by a neighborhood or subarea planning process.
This is an area contemplated for future sub-area planning. However, this request deals with an urgent need for housing to accommodate an increasing demand for a special needs segment of our community currently being housed within the adjacent former motel. The approval of this request would not prejudice the outcome of future land use planning.

3. The proposed amendment can be reasonably reviewed within the resources and time frame of the Annual Comprehensive Plan Amendment Work Program.
The use of the property is for upgraded housing for residents of the existing motel complex. The tenants are recovering and/or recovered addicts and their families. This is a long-standing and successful program known as Ascenda. Ascenda has reached out to both the immediate neighbors and the West Hills Neighborhood Council and resolved many questions and concerns. We therefore do not expect much opposition, if any. Thus, the proposed amendment can be reviewed within the regular and normal time frame.
4. In the case of a private application for a land use map change, nearby properties may also seem to be candidates for amendment. At the time of docketing or during plan commission review, expansion of the geographic scope of an amendment proposal may be considered, shared characteristics with nearby, similarly situated property may be identified and the expansion is the minimum necessary to include properties with those shared characteristics. Has the applicant had any outreach to surrounding property owners whose property may be so situated?
As stated above, the management of Ascenda has reached out to neighboring residence but not for the purpose of considering inclusion of their property within this request.
5. Describe how the proposed amendment is consistent with current general policies in the comprehensive plan for site-specific amendment proposals. The proposed amendment must be consistent with policy implementation in the Countywide Planning policies, the GMA, or other state or federal law, and the WAC.
The proposal lies adjacent to an existing Mini-Center. It provides the increased housing mentioned within the policy discussions concerning Neighborhood Mini-Centers at page 3-39 where it states that higher density residential use is encouraged in these areas. LU 1.7 discusses states that residential use adds market demand for businesses and enables enhanced transit service to these areas.

Since the proposed increase in residential density located next to an existing mini-center, the request is consistent with the current comprehensive plan and therefore is consistent with Countywide Planning Policies, the GMA and other applicable state and federal regulations.
6. The proposed amendment is not the same as or substantially similar to a proposal that was considered in the previous year's threshold review process, but was not included in the Annual Comprehensive Plan Amendment Work Program, unless additional supporting information has been generated.
This is the third annual cycle within which this request has been made. In the previous two request the City Council and the Docketing Committee approved this request to go forward. Unfortunately, there were unforeseen circumstances that pre-empted the ability to go forward. In the interim, the property has been sold to Empire Health Foundation under the name of Sunset Health LLC and Ascenda is being retained as the manager and program operating on site. We therefore, fully expect the long range plans for resident housing to be implemented upon approval of this request.
7. If this change is directed by state law or a decision of a court or administrative agency, please describe. N/A

8. Please provide copy of agenda or other documentation of outreach to neighborhood council made prior to application. *See attached minutes from April 2019. We have requested to be on their December agenda to give an update.*

Project Narrative Summary

Sunset Health LLC Map Amendment

Sunset Health LLC has requested to amend the comprehensive plan map from R 4-10 to R 15-30 and a corresponding zone change from RSF to RMF. The property is 2.2 acres located north and west of the S. Gov't Way and Sunset Highway intersection. The applicant owner also controls the former motel site located south of this proposed request, zoned Neighborhood Retail on an additional 1.1 acres.

The purpose of this change would allow up to 66 apartment units to be constructed adjacent to this motel site and densify the subject land adjacent to the motel and vacant land currently zoned Neighborhood Retail. If this request is approved, then the motel and vacant land would be converted to new apartment units upon the relocation of existing tenants to the subject property to enable demolition of existing motel structures and replacement with new housing thereon.

The subject site has two duplex units and one residential single-family dwelling that would be removed to accommodate the proposed apartment project. It is anticipated that construction would begin in the spring of 2021 upon approval of this request in the fall of 2020.

WEST HILLS NEIGHBORHOOD COUNCIL
MINUTES FOR THE MEETING OF APRIL 9, 2019

ATTENDANCE

Neighbors: Walter Bible, George Bressler, Sherry Bressler, Johnna Calvert, Karen Carlberg (Chair), Rick Clapp (Vice-Chair), Kimberly Craigen, Brian Houle, Jessica Jackson, Sev Jones, Karen Jurasin (Communications Director), Mark Kieffer, Stephanie Klein, Gloria Kohn, Dave Marr, Susan Mensching, Julieann Morse, Lyle Morse, Rodney Redmond, Lisa Saddler (Ascenda Executive Director), Wes Sawyer, Brandon Swafford, Annetta Theademan, LaVerne Truman, Paula Truna, Nancy Westbrook

City staff: none

Guests: Jayne Kubasak (Ascenda Board of Directors), Kylie Nagle (Spokane Parks and Recreation), Tim Ottmar (Spokane Police), Barry Saddler (Ascenda Board of Directors), Steven Wilson (Finch Arboretum Community Garden)

MINUTES

Minutes were approved for the meeting of February 12, 2019.

NEIGHBORHOOD POLICE REPORT, Tim Ottmar, Spokane Police

Tim was asked to investigate whether Ascenda had been a source of crime since its founding in 2004. He said that he has been our neighborhood police officer for 8-9 yr and never has responded to Ascenda, or been aware of crime coming from Ascenda residents. He asked some of his fellow officers, and they were not aware of any crime at Ascenda.

He presented some crime statistics for his district, P7, the Southwest District. P7 includes areas of the city that generally are south of the Spokane River and west of Division, Grand, and Perry, but not including the downtown/Riverside area. This includes the southern 2/3 of the West Hills neighborhood, all of the Grandview-Thorpe, Latah/Hangman, Browne's Addition, and Peaceful Valley neighborhoods, and parts of Cliff/Cannon and Comstock. A map of crimes in P7 from March 31 to April 6, 2019, shows several various types of crime around the Motel 6 (near the intersection of Sunset Boulevard and S Rustle St), and nothing else in West Hills, Grandview-Thorpe, Latah/Hangman, Browne's Addition, or Peaceful Valley. A table of crimes in P7 shows numbers of violent crimes and property crimes for the last 7 days, 28 days, and year to date, without showing specifically where they were within the district. All of these are reported crimes, not arrests. These will be posted on Nextdoor.

Tim addressed homelessness in our neighborhood. If you see a camp, call 311. Current laws limit what the police can do. The priority is to direct homeless people to services where they can get help. If you have questions or concerns, email Tim at tottmar@spokanepolice.org.

Tim was asked about mailbox theft. Apparently very few of these crimes have been reported to Spokane Police. It is more effective to report to Spokane Police (call Crime Check at 456-2233 or COPS Southwest at 755-2677) than to the post office. Cameras are the most effective tool (Ring and Wyze were recommended). Photos can be forwarded to Spokane Police, and if the perpetrator is familiar to them, they can act.

COMMUNITY ASSEMBLY REPORT, Paul Bundy, West Hills CA Representative

Paul was absent.

SUMMER PROGRAMS FROM SPOKANE PARKS AND RECREATION, Kylie Nagle, Spokane Parks and Recreation

Kylie told us about two free activities that will be available this summer. First, mobile rec vans will come to four city parks from June 17 to August 22, from 10:00 a.m. to 1:00 p.m. They will be at Grant Park on Mondays, Friendship Park on Tuesdays, A.M. Cannon Park on Wednesdays, and Cannon Hill Park on Thursdays. The vans will have a variety of sports and recreation equipment for children to use. All children and parents are welcome. Second, swimming is free for all children and adults at all city outdoor pools, which will be open the same dates as the mobile rec vans. Everyone needs a Splash Pass, which can be obtained for free at SpokaneRec.org, any city aquatic center, or by calling 311.

TRAFFIC CALMING FOR GOVERNMENT WAY, Susan Mensching, West Hills

Susan submitted a traffic calming proposal for Government Way last month. She requested several improvements to get drivers to slow down and to make it easier to cross the road. These include speed signs and crosswalks. She also requested two West Hills gateway signs. We will find out in a few months whether our request is funded.

NEIGHBORHOOD SIGN

Spokane Engineering Services proposed several variations of the neighborhood sign that we sent to them several months ago for installation on Sunset Boulevard. The sign will be in a landscaped area in the median of Sunset Boulevard somewhere around Assembly Street to Royal Street, visible to eastbound drivers.

We looked at five variations of the sign. Votes were 3, 16, 0, 0, 0. Our choice has a dark brown background, white lettering, and green and white trees. We will insist that the sun be changed from green to white. The winning sign will be posted on Nextdoor. (Note: Someone asked about resistance to graffiti. Karen C asked Rich Proszek, our city engineering contact, and he said that the sign will be made from wood, with a graffiti resistant coating.)

FINCH ARBORETUM COMMUNITY GARDEN, Nancy Westbrook and Steven Wilson

Nancy and Steve described the Community Garden at Finch Arboretum and invited anyone to participate. The garden is about 100 yards south of Woodland Center. It started in 2017 and has grown each year. This year there will be 14 plots assigned to individuals or families, as well as a community plot from which anyone can take produce. Leftover produce is donated to a worthy cause; last year about 500 pounds were donated. If you would like to apply for a plot for 2019, go to <https://www.facebook.com/groups/396273954067253>. The application fee is \$25.

ASCENDA, Lisa Saddler, Executive Director

Lisa told us about the history of AscendA, what is happening there these days, and what the future might hold.

History: The AscendA property previously belonged to John Coghlan. George Nossek bought the property from him in 2004. (George Nossek purchased the property and financed it with John Coghlan.) Initially George called the facility Christmas House, and used the property to house homeless people, but soon thereafter he transitioned it to a facility for sober living. Lisa joined the Board of Directors in 2006, then complained a lot about rules not being followed and poor supervision. New rules were implemented, and the name was changed to AscendA. Lisa was named Executive Director in about 2008. Also in 2008, John foreclosed on the property and took back ownership. He allowed AscendA to stay because he believed in its mission. John died recently, and now the property is owned by his heirs.

AscendA in 2019: There are 43 residents, including children. Several residents came to our meeting. Adults come to AscendA because they have been addicted, they are committed to

recovery and sober living, and they want a home that is safe and supportive for maintaining sobriety. Some people have lived there for several years. The residents become family for one another. Absolute sobriety and rigorous honesty are required. Urinalysis tests are done regularly, and if someone refuses, or fails, they must move out of the property immediately. Residents sign a contract when they move there, promising to follow the rules. Guests follow the same rules. Sex offenders are not allowed, partly because children live there. The children go to Spokane public schools. About 85% of the adults have full-time jobs. Everyone pays for rent and utilities. Rent funds the operating expenses for AscendA. There is a curfew, which is relaxed for people whose work schedule requires them to come and go at odd hours. A few residents told us about their successes in achieving sobriety, earning degrees, keeping stable jobs, earning awards at their jobs, and getting their children back. Empire Health Foundation, a Spokane philanthropic organization, provides much of the funding for AscendA.

Lisa and the residents want to be part of our neighborhood. Returning to a normal social life, and to community involvement, is part of the recovery process. All of us are welcome to attend their weekly meetings, Mondays at 5:00 p.m. They have a barbecue every summer, to which they invite the police, the nearby neighbors, and other community members; they will send us an invitation this summer. Karen J will send all AscendA residents an invitation to join our Nextdoor.

Future: The goal is to purchase the property from the Coghlan heirs. Empire Health Foundation will partner with AscendA for the purchase and development of the property. The purchase has been complicated by changing demands from the heirs. This is the reason that the zoning change request was withdrawn in both 2018 and 2019 (Lisa was not involved in the zoning change requests). Once the property is owned by AscendA, the plan is to build four 8-plexes, with four residences on each of two floors. These should look like any normal neighborhood. More 8-plexes could be built in the future. Old buildings will be removed. (AscendA wants to offer the Department of Corrections office space to make it easier for the parole officers as well as the residents on parole.) AscendA also would like to buy the property at the northwest corner of Sunset Boulevard and Government Way, which is owned by a different owner, and currently is for sale.

See ascendaspokane.com.

8:03 - ADJOURN

Environmental Checklist

File No.19-504COMP

Purpose of Checklist:

The State Environmental Policy Act (SEPA) chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An Environmental Impact Statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

Instructions for Applicants:

This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or give the best description you can.

You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply." Complete answers to the questions now may avoid unnecessary delays later.

Some questions ask about governmental regulations, such as zoning, shoreline, and landmark designations. Answer these questions if you can. If you have problems, the governmental agencies can assist you.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Use of checklist for nonproject proposals:

Complete this checklist for nonproject proposals, even though questions may be answered "*does not apply*."

IN ADDITION, complete the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (Part D).

For nonproject actions, the references in the checklist to the words "project," "applicant," and "property or site" should be read as "proposal," "proposer," and "affected geographic area," respectively.

A. BACKGROUND

1. Name of proposed project, if applicable: **Sunset Health Map Amendment**
2. Name of applicant: **Land Use Solutions & Entitlement**
3. Address and phone number of applicant or contact person: **Dwight Hume
9101 N Mt View Lane Spokane WA 99218 509-435-318**
4. Date checklist prepared: **March 29 2020**
5. Agency requesting checklist: **City of Spokane**
6. Proposed timing or schedule (including phasing, if applicable): **Immediate upon approval**
7. a. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. **The project may be phased with approximately 60 units within the subject amendment area.**

b. Do you own or have options on land nearby or adjacent to this proposal? If yes, explain. **Yes, the applicant owns the 1.3 acre motel site immediately south of the subject property that contains the motel and is zoned NR-35.**
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to his proposal. **Unknown**
9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. **No other applications are pending**
10. List any government approvals or permits that will be needed for your proposal, if known. **Map amendment, zone change and development permits.**
11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. **The project encompasses 2.2 acres and the proposed amendment would generate up to 66 residential units.**

Reviewer's Note:

This checklist has been submitted as part of a Comprehensive Plan Amendment. No construction has been proposed or designed for this project, nor is any such construction required or a condition of approval for the Amendment. The City recommends that readers disregard any specific construction details herein, such as the removal of existing structures or the construction of new housing in the future.

12. Location of the proposal. Give sufficient information to a person to understand the precise location of your proposed project, including a street address, if any, and section, township and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit application related to this checklist. **The property consist of one platted block bound by 7th and 8th, S Gov't Way and vacated "C: street. In the vicinity of Sunset Highway and S Gov't Way.**
13. Does the proposed action lie within the Aquifer Sensitive Area (ASA)? The General Sewer Service Area? The Priority Sewer Service Area? The City of Spokane? (See: Spokane County's ASA Overlay Zone Atlas for boundaries.)
Yes; Sewer Service Area: Yes; City of Spokane
14. The following questions supplement Part A.
- a. Critical Aquifer Recharge Area (CARA) / Aquifer Sensitive Area (ASA)
- (1) Describe any systems, other than those designed for the disposal of sanitary waste, installed for the purpose of discharging fluids below the ground surface (includes systems such as those for the disposal of stormwater or drainage from floor drains). Describe the type of system, the amount of material to be disposed of through the system and the types of material likely to be disposed of (including materials which may enter the system inadvertently through spills or as a result of firefighting activities).
Non-Project Action, to be determined at time of development.
- (2) Will any chemicals (especially organic solvents or petroleum fuels) be stored in aboveground or underground storage tanks? If so, what types and quantities of material will be stored?
Non-Project Action, to be determined at time of development.
- (3) What protective measures will be taken to insure that leaks or spills of any chemicals stored or used on site will not be allowed to percolate to groundwater. This includes measures to keep chemicals out of disposal systems.
Non-Project Action, to be determined at time of development.
- (4) Will any chemicals be stored, handled or used on the site in a location where a spill or leak will drain to surface or groundwater or to a stormwater disposal system discharging to surface or groundwater?
Non-Project Action, to be determined at time of development.
- b. Stormwater
- (1) What are the depths on the site to groundwater and to bedrock (if known)?
Non-Project Action, to be determined at time of development.

- (2) Will stormwater be discharged into the ground? If so, describe any potential impacts?

Non-Project Action, to be determined at time of development.

TO BE COMPLETED BY APPLICANT

B. ENVIRONMENTAL ELEMENTS

1. Earth

- a. General description of the site (circle one): *flat, rolling, hilly, steep slopes, mountains, other.*
- b. What is the steepest slope on the site (approximate percent slope)? **N/A**
- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland. **Non-Project Action, to be determined at time of development.**
- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. **Non-Project Action, to be determined at time of development.**
- e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill: **Non-Project Action, to be determined at time of development.**
- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. **Non-Project Action, to be determined at time of development.**
- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? **Non-Project Action, to be determined at time of development.**
- h. Proposed measures to reduce or control erosion or other impacts to the earth, if any: **Non-Project Action, to be determined at time of development.**

2. Air

- a. What type of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial, wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known. **Non-Project Action, to be determined at time of development.**

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. **Yes, overhead railroad trestle adjacent the subject property.**
- c. Proposed measures to reduce or control emissions or other impacts to air, if any:
Non-Project Action, to be determined at time of development.

3. Water

a. SURFACE:

- (1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.
Latah Creek is located east of the subject property approximately 1/2 mile.
- (2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.
No
- (3) Estimate the amount of fill and dredge material that would be placed in or removed from the surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.
None
- (4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.
No, the site is served with City of Spokane water service
- (5) Does the proposal lie within a 100-year floodplain? ____ If so, note location on the site plan.
No
- (6) Does the proposal involve any discharge of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.
No

b. GROUND:

- (1) Will groundwater be withdrawn, or will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.
No
- (2) Describe waste material that will be discharged into the ground from septic tanks or other sanitary waste treatment facility. Describe the general size of the system, the number of houses to be served (if

applicable) or the number of persons the system(s) are expected to serve.

None as the site is served by public sewer _____

c. WATER RUNOFF (INCLUDING STORMWATER):

- (1) Describe the source of runoff (including stormwater) and method of collection and disposal if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Run-off would be limited to stormwater and discharged into existing city storm drains. _____

- (2) Could waste materials enter ground or surface waters? If so, generally describe.

No _____

d. PROPOSED MEASURES to reduce or control surface, ground, and runoff water impacts, if any.

None _____

4. Plants

a. Check or circle type of vegetation found on the site:

 X Deciduous tree: *alder, maple, aspen, other.*

 X Evergreen tree: *fir, cedar, pine, other.*

 X Shrubs

 X Grass

_____ Pasture

_____ Crop or grain

_____ Wet soil plants, *cattail, buttercup, bullrush, skunk cabbage, other.*

_____ Water plants: *water lilly, eelgrass, milfoil, other.*

_____ Other types of vegetation.

b. What kind and amount of vegetation will be removed or altered? **Non-Project Action, to be determined at time of development.** _____

c. List threatened or endangered species known to be on or near the site.
None _____

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: **None** _____

5. Animals

a. Circle any birds and animals which have been observed on or near the site are known to be on or near the site:

birds: ***hawk, heron, eagle, songbirds, other.*** **Urban fowl** _____

mammals: *deer, bear, elk, beaver, other.* _____

fish: *bass, salmon, trout, herring, shellfish, other.* _____
other: _____

- b. List any threatened or endangered species known to be on or near the site.

Unknown _____

- c. Is the site part of a migration route? If so, explain. _____

No

- d. Proposed measures to preserve or enhance wildlife, if any: _____

None _____

6. Energy and natural resources

- a. What kinds of energy (electric, natural gas, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc. **Non-Project Action, to be determined at time of development.**

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. _____

Unknown

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

None

7. Environmental health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, describe. **No** _____

- (1) Describe special emergency services that might be required.

None

- (2) Proposed measures to reduce or control environmental health hazards, if any:

None

- b. NOISE:

- (1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

Train traffic from adjacent railroad overpass _____

- (2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Non-Project Action, to be determined at time of development.

- (3) Proposed measure to reduce or control noise impacts, if any:
None _____

8. Land and shoreline use

- a. What is the current use of the site and adjacent properties? **On site: 5 DU's and vacant land; North, single family and vacant lots; East: Apartment ground, retail, South: Former motel and vacant.** _____
- b. Has the site been used for agriculture? If so, describe. _____
No _____
- c. Describe any structures on the site. **2 duplex buildings and one single family** _____
- d. Will any structures be demolished? If so, which? **Yes, all will be eliminated**
- e. What is the current zoning classification of the site? **RSF** _____
- f. What is the current comprehensive plan designation of the site? **Residential 4-10** _____
- g. If applicable, what is the current shoreline master program designation of the site?
N/a _____
- h. Has any part of the site been classified as a critical area? If so, specify. **No**
- i. Approximately how many people would reside or work in the completed project?

Non-Project Action, to be determined at time of development.

- j. Approximately how many people would the completed project displace?
None, the apartments would be built before the existing units are removed. _____
- k. Proposed measures to avoid or reduce displacement impacts, if any: **Build new units before removing the existing.**
- l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: **Non-Project Action, to be determined at time of development.** _____

9. Housing

- a. Approximately how many units would be provided, if any? Indicate whether high, middle or low-income housing. **66 apartment units** _____

- b. Approximately how many units, if any, would be eliminated? Indicate whether high-, middle- or low-income housing. **5 units in two duplexes and one single family unit. Low income units.** _____
- c. Proposed measures to reduce or control housing impacts, if any: **Build new before demo of old.** _____

10. Aesthetics

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? **Non-Project Action, to be determined at time of development.** _____
- b. What views in the immediate vicinity would be altered or obstructed? **Non-Project Action, to be determined at time of development.** _____
- c. Proposed measures to reduce or control aesthetic impacts, if any: **None** _____

11. Light and Glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur? **Non-Project Action, to be determined at time of development.** _____
- b. Could light or glare from the finished project be a safety hazard or interfere with views? **No** _____
- c. What existing off-site sources of light or glare may affect your proposal? **None** _____
- d. Proposed measures to reduce or control light and glare impacts, if any: **None** _____

12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity? **Centennial Trail is SE of the subject property across Sunset Highway** _____
- b. Would the proposed project displace any existing recreational uses? If so, describe. **No** _____
- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: **None** _____

13. Historic and cultural preservation

- a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe. **No** _____
- b. Generally describe any landmarks or evidence of historic archaeological, scientific or cultural importance known to be on or next to the site.
None _____
- c. Proposed measures to reduce or control impacts, if any: _____
None _____

14. Transportation

- a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any. **S Gov't Way and 7th Avenue** _____
- b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop? **No** _____
- c. How many parking spaces would the completed project have? How many would the project eliminate? **Non-Project Action, to be determined at time of development.** _____
- d. Will the proposal require any new roads or streets, or improvements to existing roads or streets not including driveways? If so, generally describe (indicate whether public or private). **Non-Project Action, to be determined at time of development.** _____
- e. Will the project use (or occur in the immediate vicinity of) water, rail or air transportation? If so, generally describe. **Yes, trains use an adjacent track. However there are no stops or other features that would be affected or used by the project.** _____
- f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak would occur. **Non-Project Action, to be determined at time of development.** _____

(Note: to assist in review and if known indicate vehicle trips during PM peak, AM Peak and Weekday (24 hours).)

- g. Proposed measures to reduce or control transportation impacts, if any: **None**

15. Public services

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe. **Yes, due to increased housing of the site**
- b. Proposed measures to reduce or control direct impacts on public services, if any: **Full compliance with applicable building and fire codes.**

16. Utilities

- a. Circle utilities currently available at the site: *septic* **electricity, natural gas, water, refuse service, telephone, sanitary sewer,** *system, other.*
- b. Describe the utilities that are proposed for the project, the utility providing the service and the general construction activities on the site or in the immediate vicinity which might be needed. **Non-Project Action, to be determined at time of development.**

C. SIGNATURE

I, the undersigned, swear under penalty of perjury that the above responses are made truthfully and to the best of my knowledge. I also understand that, should there be any willful misrepresentation or willful lack of full disclosure on my part, the agency must withdraw any determination of Nonsignificance that it might issue in reliance upon this checklist.

Date: 3-29-20 _____ Signature: Dwight J Hume _____

Please Print or Type:

Proponent: Dwight J Hume _____ Address: 9101 N Mt. View Lane

Phone: 509.435.3108 _____ Spokane WA, 99218

Person completing form (if different from proponent): Same _____

Phone: _____ Address: _____

FOR STAFF USE ONLY

Staff member(s) reviewing checklist: Kevin Freibott _____

Based on this staff review of the environmental checklist and other pertinent information, the staff concludes that:

- ☒ A. there are no probable significant adverse impacts and recommends a Determination of Nonsignificance.
- ☐ B. probable significant adverse environmental impacts do exist for the current proposal and recommends a Mitigated Determination of Nonsignificance with conditions.
- ☐ C. there are probable significant adverse environmental impacts and recommends a Determination of Significance.

D. SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS
(Do not use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage or release of toxic or hazardous substances; or production of noise?

**The proposal is to build apartments for residential use in compliance
With all applicable development standards.** _____

Proposed measures to avoid or reduce such increases are:

Same as above _____

2. How would the proposal be likely to affect plants, animals, fish or marine life?

**Future development of the site would be urban in nature, similar to the uses
adjoining the subject parcels. Eventual redevelopment of the site may require
the removal of on-site plants, subject to the requirements of the Spokane
Municipal Code for new construction.** _____

Proposed measures to protect or conserve plants, animals, fish or marine life are:

None _____

3. How would the proposal be likely to deplete energy or natural resources?

**While some additional resources would be required during redevelopment,
these would be similar to those required of any construction project.** _____

Proposed measures to protect or conserve energy and natural resources are:

None _____

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, flood plains or prime farmlands?

There are no such areas on site _____

Proposed measures to protect such resources or to avoid or reduce impacts are:

None _____

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

**If redeveloped in the future the site could change from 12 platted residential
lots to 66 apartment units. The immediate area is a mixture of apartments,
retail and office uses. The subject site was once a mobile home park.** _____

Proposed measures to avoid or reduce shoreline and land use impacts are:
Development per applicable development standards. Non-Project Action, to be determined at time of development._____

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Non-Project Action, to be determined at time of development._____

Proposed measures to reduce or respond to such demand(s) are:

Non-Project Action, to be determined at time of development._____

7. Identify, if possible, whether the proposal may conflict with local, state or federal laws or requirements for the protection of the environment.

The proposal would not conflict with any applicable state or federal laws or regulations._____

C. SIGNATURE

I, the undersigned, swear under penalty of perjury that the above responses are made truthfully and to the best of my knowledge. I also understand that, should there be any willful misrepresentation or willful lack of full disclosure on my part, the agency may withdraw any Determination of Nonsignificance that it might issue in reliance upon this checklist.

Date: 3-29-20 _____ Signature: Dwight J Hume _____

Please Print or Type:

Proponent: Dwight J Hume _____ Address: 9101 N Mt. View Lane

Phone: 509.435.3108 _____ Spokane WA, 99218

Person completing form (if different from proponent): Same _____

Phone: _____ Address: _____

FOR STAFF USE ONLY

Staff member(s) reviewing checklist: Kevin Freibott _____

Based on this staff review of the environmental checklist and other pertinent information, the staff concludes that:

- ☒ A. there are no probable significant adverse impacts and recommends a Determination of Nonsignificance.
- ☐ B. probable significant adverse environmental impacts do exist for the current proposal and recommends a Mitigated Determination of Nonsignificance with conditions.
- ☐ C. there are probable significant adverse environmental impacts and recommends a Determination of Significance.

NONPROJECT DETERMINATION OF NONSIGNIFICANCE

FILE NO(S): Z19-504COMP

PROPONENT: Sunset Health, LLC (Agent: Dwight Hume, Land Use Solutions and Entitlement).

DESCRIPTION OF PROPOSAL: Pursuant to the procedures established by SMC 17G.060, enabled by RCW 36.70A.130, the proposer asks the City of Spokane to amend the land use designation (Map LU-1 of the Comprehensive Plan) and zoning designation (Official Zoning Map of the City of Spokane) for two properties located in the West Hills neighborhood.

LOCATION OF PROPOSAL, INCLUDING STREET ADDRESS, IF ANY: The proposal concerns two parcels, 25234.0902 and 25234.6501, located immediately southwest of the intersection of W 7th Avenue and S Audubon Street. The parcels are located at 3004 W 8th Avenue. The proposal would affect an area of approximately 2.2 acres.

Legal Description: Lots 1 through 12 of Block 13, Terrace Park Lewis & Shaw's Addition to the City of Spokane in Section 23, Township 25 North, Range 42 East.

LEAD AGENCY: City of Spokane

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An Environmental Impact Statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

☐ There is no comment period for this DNS.


☐ This DNS is issued after using the optional DNS process in section 197-11-355 WAC. There is no further comment period on the DNS.

☒ This DNS is issued under 197-11-340(2); the lead agency will not act on this proposal for at least 14 days from the date of issuance (below). Comments regarding this DNS must be submitted no later than 5 p.m. on September 7, 2020 if they are intended to alter the DNS.

Responsible Official: Louis Meuler

Position/Title: Interim Director, Planning Services **Phone:** (509) 625-6300

Address: 808 W. Spokane Falls Blvd., Spokane, WA 99201

Date Issued: August 24, 2020 **Signature:** 

APPEAL OF THIS DETERMINATION, after it has become final, may be made to the City of Spokane Hearing Examiner, 808 West Spokane Falls Blvd., Spokane WA 99201. The appeal deadline is Noon on September 14, 2020 (21 days from the date of the signing of this DNS). This appeal must be on forms provided by the Responsible Official, make specific factual objections, and be accompanied by the appeal fee. Contact the Responsible Official for assistance with the specifics of a SEPA appeal.



Spokane Tribe of Indians
Tribal Historic Preservation Office
P.O. Box 100 Wellpinit WA 99040

May 5, 2020

TO: Kevin Freibott, Assistant Planner

RE: Z19-504COMP

Mr. Freibott,

Thank you for contacting the Tribe's Historic Preservation Office. We appreciate the opportunity to provide a cultural consent for your project.

We have reviewed your project forwarded to our office; we are concerned that the project area potentially contains cultural resources which would be impacted by the proposed ground disturbing activity, and is a high-risk area for archeological sites and human remains.

Recommendation: Cultural Survey, Sub-surface testing.

Once the survey / sub-surface testing is completed we will do more mitigation to discuss the plan of action if cultural sites are identified during the cultural survey.

However, if any artifacts or human remains are found upon excavation activity this office is to be notified and the immediate area cease

Should additional information become available our assessment may be revised.

Again, thank you for this opportunity to comment and consider this a positive action that will assist us in protecting our shared heritage.

If questions arise, please contact me at 258-4222

Sincerely,

Randy Abrahamson
Tribal Historic Preservation Officer

From: [Karen Carlberg](#)
To: [Freibott, Kevin](#)
Cc: [Mike Gifford](#); [Paul Bundy](#); [Karen Jurasin](#); [Rick Clapp](#)
Subject: West Hills comments on Z19-504COMP 8th Ave
Date: Sunday, May 10, 2020 7:50:15 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Kevin,

I have the following comments on the Comprehensive Plan Land Use Map Amendment Proposal for 3004 W 8th Avenue:

12.a: It is the Fish Lake Trail that is immediately SE of the property, not the Centennial Trail.

14.a: Accessing the property from W 7th Avenue would be appropriate. If there is direct access from the property to Government Way, this could create traffic problems because the intersection would be so close to the major intersection of Sunset Boulevard and Government Way.

14.b: There are STA stops on Sunset Boulevard just east of Government Way. A neighbor who used these bus stops when he was still working told us that some of the other users were Ascenda residents.

Keep in mind that I'm still figuring out how this process works. While this application includes more details than the one that Mr. Hume submitted 1+ yr ago, it still has fewer details that I think it should. If the purpose of this exercise is, in part, a thoughtful review by neighboring residents, then a lot more details are required for a meaningful review. Our neighborhood council has met with the Ascenda Executive Director several times, and with the Empire Health Foundation Interim President once. We now know quite a lot about plans for the property and have no remaining questions. But if we had not had these meetings, and were relying solely on this application, we still would not have sufficient information, and we still would have the same questions, concerns, controversy, and anger that were created when the application was submitted to us 1+ yr ago. I believe that the City of Spokane should seriously consider examining their requirements for these applications. The current requirements do not serve the intended purpose of sending the applications to neighborhoods, especially if a project has the potential for controversy or significant impact on neighboring residents.

Karen A. Carlberg
Chair, West Hills Neighborhood Council

From: [Scott Kappes](#)
To: [Freibott, Kevin](#)
Subject: Public Comment -Z19-504COMP, 8th Ave land use change
Date: Tuesday, August 4, 2020 9:37:43 PM

[CAUTION - EXTERNAL EMAIL - Verify Sender]

City of Spokane & Kenvin Freibott,

I am providing comment as an adjacent land owner regarding file no. Z19-504COMP, 8th Ave land use change. I am supportive of higher density housing, however I have several issues that I feel need addressed before any land use changes. I purchased and developed my property based upon the current land use designations of the neighborhood.

The first relates to the road situation. 7th Ave and C St need to be paved and all runoff addressed. The current proposal states "run-off would be limited to stormwater and discharged into existing city storm drains." This would be an issue with less surface absorption of water with higher density development and place my existing dwelling at risk of water damage. Run-off over 7th Ave needs controlled not for only this, but an additional safety reason: runoff from the existing property washes gravel down C St and creates a liability for the city as the gravel accumulates in piles in the paved intersection of Hartson and Government Way. The only solution is paving and developing 7th Ave adjacent to the property to C St and C St between 7th and Hartson.

Paving of 7th and C St would also be necessary for increased traffic. Currently the city won't take any action to level out potholes from city garbage & recycle trucks' weekly use and a detour while repairing the Sunset Highway and Government Way intersection, along with School bus use. This needs addressed before additional traffic or services use 7th Ave and the city, with additional revenue from increased density, needs to pave and take over all maintenance of 7th Ave or will be causing harm to property values and safety of my neighbors and me. This would also include deterioration of air quality from dust if not paved.

I would like two other issues that are more personal of nature addressed before any land use changes are granted. One is that there are deer and quail populations the live in the neighborhood and some sort of green space for at least passage would be great. The other is I would like any development to require a natural screen of trees and shrubs to provide privacy from the increased density.

If the development is done right, with road improvements of paving and run-off concerns addressed, natural screening, and green space passage addressed, I think the property and proposal would be a benefit for Spokane.

Thank you for your consideration in these concerns, and please confirm you've received this public comment.

Sincerely,

Scott Kappes
3022 W. 7th Ave.
Spokane, Wa 99223