


**2021/2022 Comprehensive Plan Amendments**
**STAFF REPORT FOR FILE Z21-280COMP (W CORA AVE)**

Department of Planning &amp; Economic Development Services

The following staff report concerns a proposed amendment to the City's current Comprehensive Plan. The proposal is to amend 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**

<b>Parcel(s):</b>	35064.3612, 35064.3613 (private application) 35063.2005, 35064.3801 (City proposal)
<b>Address(es):</b>	440 & 516 W Cora Ave (private application) 3426 N. Post St., 139 W. Gray Ct. (City proposal)
<b>Property Size:</b>	18.87 acres (private application) 0.21 (City proposal)
<b>Legal Description:</b>	Multiple—see <b>Exhibit J</b>
<b>General Location:</b>	North side of W Cora Avenue between N Division St and N Post St
<b>Current Use:</b>	Church, parking lot, and vacant land (parcels 35064.3612, 35064.3613); multifamily housing (parcels 35063.2005, 35064.3801)

**II. APPLICANT SUMMARY**

This application has two applicants—a private applicant and the City of Spokane itself. The following information regards the original private applicant:

<b>Agent:</b>	Liam Taylor, Storhaug Engineering
<b>Applicant:</b>	Liam Taylor, Storhaug Engineering
<b>Property Owner:</b>	Faith Bible Church

The following information regards the one property added by the City:

<b>Representative:</b>	Kevin Freibott, Planning Services
<b>Property Owners:</b>	Northwood Apartments Spokane, LLC (parcel 35063.2005) Deserata Properties, LLLP (parcel 35064.3801)

**III. PROPOSAL SUMMARY**

<b>Current Land Use Designation:</b>	35064.3612, 35064.3613 (private application): Residential 4-10 (R 4-10) 35063.2005, 35064.3801 (City proposal):
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	Residential 4-10 (R 4-10) & Residential 15-30 (R 15-30)
<b>Proposed Land Use Designation:</b>	Residential 15-30 (R 15-30)
<b>Current Zoning:</b>	35064.3612, 35064.3613 (private application): Residential Single-Family (RSF) 35063.2005, 35064.3801 (City proposal): Residential Single-Family (RSF) & Residential Multifamily (RMF)
<b>Proposed Zoning:</b>	Residential Multifamily-75 (RMF-75)
<b>SEPA Status:</b>	A SEPA threshold Determination of Non-Significance (DNS) was issued on August 22, 2022. The appeal deadline is 5:00 PM on September 13, 2022.
<b>Plan Commission Hearing Date:</b>	September 14, 2022
<b>Staff Contact:</b>	Kevin Freibott, Associate Planner, <a href="mailto:kfreibott@spokancity.org">kfreibott@spokancity.org</a>
<b>Staff Recommendation:</b>	Private application: <b>No Recommendation</b> City-sponsored proposal: <b>Approve</b>

#### IV. BACKGROUND INFORMATION

- 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) from “Residential 4-10” to “Residential 15-30” and zoning designation (Official Zoning Map of the City of Spokane) from “Residential Single-Family (RSF)” to “Residential Multifamily-75 (RMF-75)” for two parcels located in the North Hill Neighborhood. The applicant has stated that they do not intend to remove the existing Church facility.

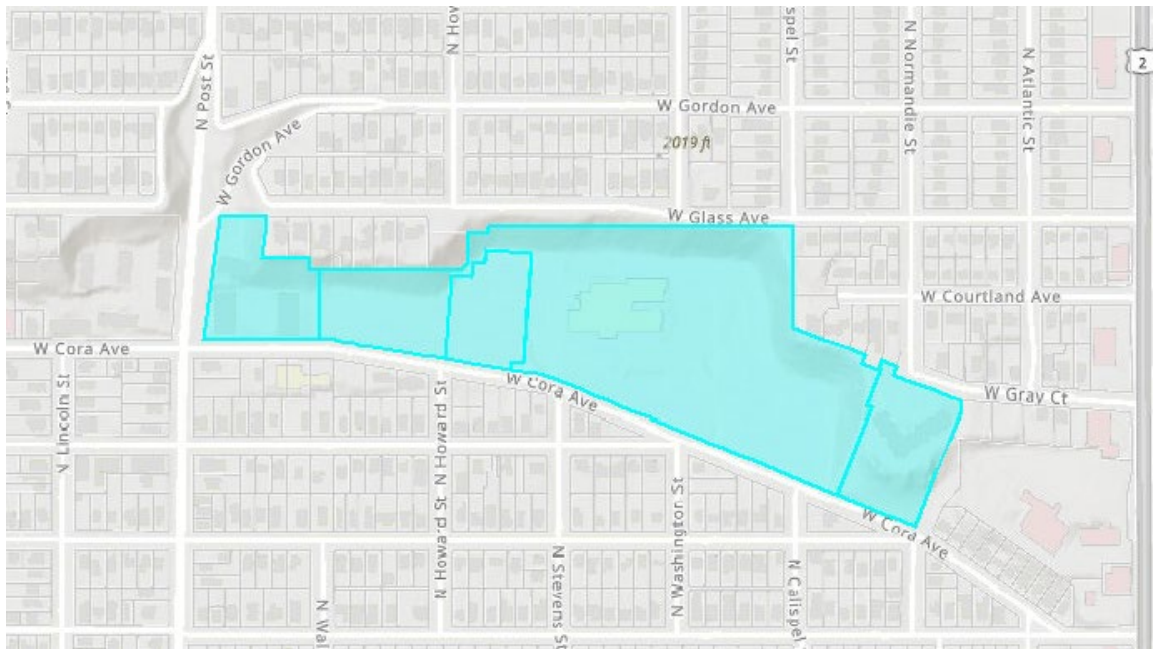
During the threshold review process, the City Council added portions of two additional properties to the proposal. Both are directly adjacent to the original proposal and share the same existing land use plan map designation and zoning as the original application. No new development is proposed or expected on the additional properties at this time.

- Site Description and Physical Conditions:** The original application site contains a church building near the center, with adjacent parking lot and landscaping. There is an approximately 75- to 80-foot bluff on the northern quarter of the property. The expansion parcel 35063.2005, located on the west side of the original application parcels, currently contains multifamily housing and parking and is relatively flat. The portion of that parcel that would be redesignated as part of this proposal contains a parking shelter. The expansion parcel 35064.3801, located on the east side of the original application parcels, currently contains multifamily housing and parking and is relatively steep with approximately 70’ grade increase from south to north. The portion of that parcel that would be amended by this proposal contains landscaping and a drive access aisle from W Gray Ct.
- Property Ownership:** The two parcels in the original applicant proposal are owned by Faith Bible Church. The expansion parcels are owned by Northwood Apartments Spokane, a registered WA State

Limited Liability Company based in Spokane (parcel 35063.2005), and Deserata Properties, LLLP, a registered WA State Limited Liability Limited Partnership based in Spokane (parcel 35064.3801).

4. **Adjacent Property Improvements and Uses:** The proposal, including the original and expansion parcels, is surrounded by existing development of the following nature:

Boundary	Land Use	Zone	Use
North	Residential 4-10	RSF	Single-family homes
East	Residential 10-20, General Commercial	RTF, General Commercial	Multi-family development, commercial uses
South	Residential 4-10	RSF	Single-family homes
West	Residential 15-30	RMF	Multi-family development, single-family homes



*Aerial map showing the general building footprints of surrounding properties.*

5. **Street Class Designations:** W Cora Ave and W Gray Ct are both classified as Urban Local Access. Urban Local Access streets primarily function to provide access to adjacent properties on lower trafficked streets. N Post St is classified as an Urban Minor Arterial. N Post Street to the west is a Minor Arterial, running north-south. W Cora Ave and W Gray Ct eventually connect to N Division St to the east, which is designated as a Principal Arterial.
6. **Current Land Use Designation and History:** As shown in **Exhibit A**, the current land use plan map designation of the original application properties is “Residential 4-10 Dwelling Units per Acre (R 4-10).” The expansion properties are both currently designated “Residential 15-30 Dwelling Units Per Acre (R 15-30)” except for small segments of each property, which are currently designated “Residential 4-10 Dwelling Units per Acre (R 4-10).” The subject properties have been designated as

such since the City's 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 to "Residential 15-30 Dwellings per Acre (R 15-30)" for the entirety of the original application parcels as well as the small portions of both expansion parcels which do not currently fall under this designation.
8. **Current Zoning and History:** As shown in **Exhibit C**, the current zoning of the original application properties is "Residential Single-Family (RSF)." The zoning of both expansion parcels is currently "Residential Multifamily (RMF)" except for small portions of each which are currently "Residential Single-Family (RSF)." The proposed action would only amend those portions of the sites that are currently Zoned RSF. The historical zoning is shown in the following table:

Year	Zone	Description
<b>Prior to 1958</b>	Class I Residential	A low-density residential zone.
<b>Prior to 1975</b>	R2 Two-Family Residence	A medium-density residential zone.
<b>Prior to 2006</b>	R1 One-Family Residence	A low-density residential zone.

The subject properties were initially zoned for low-density residential uses. While they were intensified around 1975 for slightly more dense development, by 2006 they had returned to a low-density residential zoning. The current zoning pattern has remained relatively unchanged since sometime after 1975.

9. **Proposed Zoning:** As shown in **Exhibit D**, the proposal seeks to amend the zoning to "Residential Multifamily-75 foot height limit (RMF-75)" for the original application parcels. The typical height limitation in RMF is 35 feet, however the Municipal Code allows for taller heights, which are denoted by a number following the zoning category. In this case, the applicant has requested 75 feet as a height maximum. According to SMC 17C.110.215.C.1, 75 feet is not available as a height limit. That section allows maximum heights of 35, 40, 55, 70, or 150 feet in RMF zones, thus RMF-70 would be a more appropriate zone height maximum per the applicant's proposal and SMC requirements.

Regardless, a change in maximum height would not affect the maximum density allowed on site, which is set by the land use plan map designation of Residential 15-30. SMC requirements for density, lot coverage, required parking, and all other standards would remain the same under the applicant's proposal. Only the height limit would change.

The City-sponsored application seeks to amend the zoning of the expansion parcels to "Residential Multi-Family (RMF)" for the entirety of both. Of

## V. APPLICATION PROCESS AND PUBLIC COMMENT

1. **Key Steps:** The application is being processed according to SMC 17G.020, including the following steps:

Application Submitted ..... October 29, 2021

Threshold Application Certified Complete .....	December 3, 2021
Council Threshold Subcommittee Established <sup>1</sup> .....	January 10, 2022
Council Threshold Subcommittee Met .....	February 1, 2022
Annual Work Program Set <sup>2</sup> .....	March 21, 2022
Agency/Department Comment Period Ended .....	April 29, 2022
Notice of Application Posted .....	May 25, 2022
Plan Commission Workshop .....	June 8, 2022
60-Day Public Comment Period Ended .....	July 25, 2022
SEPA Determination Issued (Scheduled) .....	August 22, 2022
Notice of Public Hearing Posted (Scheduled) .....	August 31, 2022
Plan Commission Hearing Date (Scheduled) .....	September 14, 2022

- 2. Comments Received:** A request for comments was issued to City departments, local agencies, and departments, along with pertinent application details on April 15, 2022. By the close of the agency comment period on April 29, 2022, three comments had been received (see **Exhibit M**). Spokane Regional Transportation Council (SRTC) indicated no concern over the proposal, while the Department of Ecology generically noted that any future construction activities may require a Construction Stormwater General Permit. Such a permit would be considered at the time of building permit approval. As this is a non-project action, no such permit is required at this time. Spokane Transit Authority submitted comments in full support of the proposal, noting that increasing opportunities for mixed use or multifamily development near transit is a benefit to the City and its residents.

Following the agency/department comment period, a Notice of Application was issued on May 25, 2022 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 and in the Spokesman Review. City staff emailed notice to the North Hill and Emerson/Garfield neighborhood councils as well.

Numerous public comments were submitted during the public comment period (see **Exhibit N**). These comments are summarized in the following table:

Commenter	Topic	Concern
Chris Barclay	Neighborhood Character	Felt increased density would have detrimental effects on the existing neighborhood.
	Transportation	Expressed doubt that the site could be adequately accessed by streets or transit for dense development. Safety of adjacent roads was also a factor.
	Site Suitability	Feels the site is unsuitable for development given subsurface conditions and utility infrastructure.

<sup>1</sup> Spokane City Council Resolution 2022-0007

<sup>2</sup> Spokane City Council Resolution 2022-0028

Commenter	Topic	Concern
Chris Barclay (Cont.)	Public Safety	Fears that multi-family development will bring more crime or vandalism.
Mike Flahaven	Questions	No opinion given, questions only. Staff responded via email.
Roger Habets	Public Notice	Questioned why the noticing area was set where it was. Staff responded via email.
	Neighborhood Character	Expressed opposition to apartments across from his home.
	Transportation	Concerned about traffic generated by the proposed multi-family development, including road congestion and air pollution.
	Public Input	Expressed concern that his comments would not be considered by the City.
Hilary Garber (Multiple)	Building Height	Felt that 75 feet was too high for the area.
Loren Garber	Building Height	Felt that 75 feet was too high for the area.
Sandy Wilson	General	Generally opposed to the proposal (no reason given).
Jeffrey Thomas	Transportation	Concerned that RMF development would result in “greatly increased traffic.” Mr. Thomas also cited perceived traffic safety issues at Euclid and Division.
Greg Cripe	Transportation	Expressed concerns about site access and possible traffic safety issues in the vicinity. Also concerned about the traffic generated by a future multi-family project on the site.
	Neighborhood Character	Cited concerns with the quiet, walkable character of the surrounding neighborhood and the impact multi-family residential development would have.
Mary Robinson	Transportation	Concerned about access to the site (non-arterial) and the need for traffic calming in the vicinity.
Wendy Bauer	Land Use	Cites the fact that this area is not within a Center or Corridor and feels the proposal would intrude into an existing neighborhood, contrary with the Comprehensive Plan.
	Transportation	Concerned that vehicle trips generated by the proposal would result in significant traffic impacts.
	Public Safety	Cited her perception that the area is already a “high crime area” and that placing more residences here would exacerbate the issue.
Tim Ecklund	Building Height	Felt that “high-rise towers” in this location are unacceptable and subject to “corruption.”
	Transportation	Expressed concern that site access is not sufficient for higher density residential.
	Neighborhood Character	Concerned about a substantial population increase in an existing single-family residential neighborhood.

Commenter	Topic	Concern
Jacqueline Harvey	Building Height	Feels that structures at 75-feet would cause detrimental impacts to views from Glass Avenue and from properties to the north of the subject parcels.
Ralph Landis	Building Height	Expressed concerns that 75-foot building heights would have detrimental effects on houses to the north along Glass Avenue.
Laren Richey	Building Height	Feels 75-foot buildings are “unacceptable.”
	Transportation	Expressed concern that traffic impacts and pedestrian safety issues would be severe.
Cindy Ecklund	Building Height	Concerned that 75-foot buildings would block views.
	Transportation	Feels increased traffic from the subject properties would be unacceptable and would cause impacts to pedestrian safety.
	Schools	Feels the additional students generated by the proposal would exceed school capacity in the vicinity.
	Public Safety	Expressed concern that the proposal would result in increased crime rates in the neighborhood.
	Neighborhood Character	Felt that increased population from the subject properties would “overwhelm” the existing neighborhood.
Alvan Behar	Notification Area	Felt that the notification area should have been expanded for this proposal.
	Transportation	Expressed concerns that streets in this area are already too narrow, resulting in safety issue and snow storage problems.
	Infrastructure	Concerned that adequate power, water, sewer, etc. capacity is not available in this location.
	Public Safety	Concerned that the proposal would increase crime rates.
	Neighborhood Character	Also felt that the proposal would “overload” the existing neighborhood and affect the “historic neighborhood” character.

Concerning the area noticed for consideration of this proposal, all Comprehensive Plan Amendments are noticed according to standards in SMC 17G.020 and 17G.030, which requires (among other things) that each proposal be announced to the neighborhood council(s) involved, in the newspaper of record, and by mail to each property owner and resident within 400 feet of any part of the proposal (see **exhibit E**). Those procedures were followed in this case.

Regarding neighborhood character issues highlighted by the commenters above, it is understandable that any development would change the visual character of this location, especially given that the site has remained largely undeveloped since its annexation to the City in 1891 (save for the church structures and parking lot). When considering visual changes resulting from a Comprehensive Plan Amendment such as this, an important factor is the existing allowed development on the site, not its currently vacant state. As it is currently designated, the site could contain single-family homes, schools, churches, or other similar development. However, a change to Residential 15-30 would incrementally increase the intensity of possible development on the site in the future. That development would likely still be residential in nature, just at a higher intensity/density than currently

indicated. SMC 17G.020.030 provides approval criteria for the consideration of decisionmakers. Reviewers are encouraged to see the analysis in Section VI.2 below for an analysis of those criteria, including whether this location is appropriate for the requested land use and zoning.

When regarding traffic and circulation impacts, any new development on the site would be analyzed at that time for its direct impact on the transportation network and conditioned accordingly, pursuant to existing requirements in the SMC and standard procedures. Furthermore, any future development on the site would be required to pay a transportation impact fee, which would help fund improvements in the area and address some, if not all, of the transportation impacts from that future development. Nothing in the proposal currently under consideration—namely the Comprehensive Plan Amendment and rezone—would prevent those processes and payments from occurring.

Regarding building height, a key factor is the applicant's request that they be granted a maximum height of 75 feet on their parcels. The bluff immediately north of the site exceeds that height by five feet or more along its length, largely preventing detrimental impacts to views from W Glass Avenue at the top of the bluff. However, considering the 35-foot (or shorter) building heights of existing homes to the south of W Cora Ave, 75-foot structures on the subject parcels would constitute a large change in building height from the existing neighborhood. Once again, reviewers are encouraged to review criteria below, especially SMC 17G.020.030.K.3.

Stated concerns around land use are discussed in the following sections, specifically VI.2.K.2 below. An analysis of this proposal and the criteria/guidance provided by the Comprehensive Plan is discussed therein.

Regarding multiple comments about public safety (police), schools, and utilities, this proposal is considered a non-project action under SEPA (which considers impacts to these systems). Furthermore, if this proposal is approved no actual development is approved. For such development to occur the applicant would have to apply for building permits from the City of Spokane. Pursuant to the SMC and current policy, the City would require that any development proposal provide proof that services and utilities are adequate to serve the project prior to construction. Furthermore, this proposal was routed to all service providers in the area and the Spokane Police Department. No concerns were forwarded to the City from those entities regarding service/utility provision.

3. **Public Workshop:** A public workshop with the Spokane Plan Commission was held on June 8, 2022, during which the particulars of the proposal were presented to the Plan Commission for their consideration and discussion. The applicant was provided an opportunity to speak during the workshop, but no public comment was taken.

## 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 making a recommendation on a proposal, and by the city council in making a decision on the proposal. Following each of the considerations is staff's analysis relative to the proposed amendment.

- 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 satisfies 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 appears to specifically address the goals of concentrated urban growth and sprawl reduction. The urban growth planning goal is to encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner; the proposed amendment is located near existing water, sewer, and power utilities. The planning goal of reduce sprawl is to reduce the inappropriate conversion of undeveloped land into sprawling, low-density development. The original and expansion properties are surrounded by development and located near the North Division commercial area as well as the North Monroe Corridor. Further development in this area would occur in an area with existing capacity and infrastructure, ensuring consistency with GMA goals.

The proposal satisfies 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 or City Department comment request or require a traffic impact analysis for the proposal. The subject properties are 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 satisfies 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 from this proposal exists.

The proposal satisfies this criterion.

**E. Internal Consistency:**

- 1.** *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 these sites. Additionally, any future development will be required to be consistent with the current development regulations at the time of application submittal. 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 North Hill Neighborhood Council, utilizing funding allocated by the Spokane City Council in 2007, began a planning process in 2014 to identify and prioritize goals into an action plan. The neighborhood adopted the *North Hill Neighborhood Action Plan* in 2015. The plan focused primarily on issues related to crime reduction and public safety; economic development; improving connectivity; and preserving the neighborhood character.

The Emerson-Garfield neighborhood completed a “Neighborhood Action Plan” in June 2014 which was subsequently adopted by the City Council on July 28, 2014. A major theme of the plan was enhanced pedestrian safety and beautification. As a result of this neighborhood plan and to address significant safety issues on N Monroe St, the City implemented sweeping updates to N Monroe Street between N Indiana Ave and W Gordon Ave. These improvements included a program of streetscape improvements, lane changes, and frontage improvements known colloquially as the “North Monroe Project.”

Neither of these neighborhood plans identify strategies relating to the future use or development of the subject parcels, nor were any priority projects identified within or adjacent to the subject parcels. Therefore, the proposal to change the land-use designation and zoning for the subject properties is internally consistent with applicable neighborhood planning documents. Increased residential density in this location seems supportive of the strategies and actions called for in the neighborhood plans.

- *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.

The proposal satisfies this criterion.

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: The proposal is generally consistent with current Comprehensive Plan policies, as described in further detail in the staff analysis of Criterion K.2 below and other criteria in this report. Therefore, no amendment to policy wording is necessary and this criterion does not apply to the subject proposal.

The proposal satisfies this criterion.

- 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: 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. No comments have been received from any agency, City department, or neighboring jurisdiction which would indicate that this proposal is not regionally consistent.

The proposal satisfies 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 six other applications for Comprehensive Plan amendments as part of an annual plan amendment cycle. All seven applications are for map amendments, five for changes to the land use plan map (LU-1), one for changes to the Bicycle Facilities Map (TR-5), and one for changes to the Arterial Network Map (TR-12). When considered together, these various applications do not interact, nor do they augment or detract from each other. Thus, the cumulative effects of these various applications are minor.

This proposal satisfies this criterion.

- H. SEPA:** *SEPA<sup>3</sup> 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

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<sup>3</sup> State Environmental Protection Act

(see **Exhibit K**), 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 22, 2022.

The proposal satisfies 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 a predominantly developed area served by public facilities and services described in CFU 2.1. The proposed change in land-use plan map designation 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 satisfies this criterion.

- 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.

This criterion does not apply.

**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. Nor is one required in this case.

This criterion does not apply.

- 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: Because the proposals seek to designate the properties under the "Residential 15-30" land use plan map designation, conformance with Policy LU

1.4, Higher Density Residential Uses, is the primary consideration for this criterion. LU 1.4 states that higher density residential, like that proposed in this application, should be directed to “Centers and Corridors designated on the Land Use Plan Map.” The proposal concerns several properties that are near the North Monroe Corridor, but more than 940 feet from any Center zoning on North Monroe. Of note, a subarea planning process has been completed for this portion, as generally required by Policy LU 3.4, Planning for Centers and Corridors.

While Policy LU 1.4 encourages the placement of higher density uses within the vicinity of centers, it does allow for certain cases where higher density residential uses can be located outside the immediate vicinity of Centers and Corridors, stating:

“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.” (p. 3-8)

Specifically, as it relates to this proposal, the original applicant’s parcels are located outside a Center or Corridor but are surrounded on two sides by existing multi-family development. Furthermore, the properties are located within the general vicinity of both the North Monroe Corridor and the significant commercial and higher intensity uses found along N Division Street. While Division is not a designated Center or Corridor, it does contain significant commercial uses that would serve increased density on these two parcels.

Regarding the expansion parcels, both represent small parts of much larger parcels that already contain multi-family uses. Conversion of these small areas to Residential 15-30, matching the existing land use plan map designation and zoning on the remainder of the parcel, appears consistent with LU 1.4.

Accordingly, the proposal for both the original parcels and the expansion parcels appears consistent with applicable location criteria in the Comprehensive Plan.

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

Staff Analysis: The subject properties are adequately served by all utilities and by a minor arterial street, bus service is nearby on N Post St and N Division St, and the site is generally devoid of critical areas. There exist no physical features of the site or its surroundings that would preclude mixed-use development on the site, save for the significant bluff that impacts only the northernmost one-quarter of the properties. The property owners and City are fully aware of this feature and significant buildable area remains on the site once the sloped area is considered. As such, there are no significant site features that would preclude future development of any type.

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

Staff Analysis: See discussion under topic ‘a’ above and policies highlighted in **Exhibit H** below. Not only would the proposed land use plan map designation and zoning comply with the requirements of Policy LU 1.4, but a number of other policies would be better implemented and/or met by applying more dense/intense development on this site. This includes proximity to transportation choices (LU4.1, LU4.2, LU4.6, H 1.11) and mixed uses and diversity of housing options (H1, H1.7, H1.9, H1.18, H2.4).

There are some Comprehensive Plan policies that this proposal may impact negatively, however, such as policy LU 5.5 which states the City should “Ensure that infill and redevelopment projects are well-designed and compatible with surrounding uses and building types.” While multi-family residential development adjacent to a single-family neighborhood is not generally thought to cause significant compatibility concerns, the applicant’s proposal for building heights of up to 75 feet may result in a dramatic change in character between the single-family residential neighborhood to the north and south and the applicant’s parcels.

For consideration, all existing RMF zoning in the city is currently limited to 35 feet maximum height. While the SMC does allow the City to designate a higher maximum height for RMF zones, no such designation has been adopted anywhere in the City. There are several RHD zones with taller heights—primarily 55 feet and some as high at 70 feet. While there exists no codified limitation on what maximum height may be designated, it appears that placing 75-foot residential uses next to 35-foot single-family homes could be considered a compatibility issue and might significantly change the visual character of the existing neighborhood.

While the original proposal appears to comply with the requirements of the location criteria in Policy LU 1.4, it is unclear if it would better implement the Comprehensive Plan as a whole, especially as certain compatibility policies are considered. (see **Exhibit H**). Regarding the expansion properties, they would appear to comply with this criterion, as they do not include the increased maximum height.

Staff expresses no opinion whether the original proposal satisfies this criterion. The expansion properties satisfy this criterion.

3. **Rezoning, Land Use Plan Amendment:** *Corresponding rezoning 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 amendments are approved as proposed, the zoning designation of the subject properties will change concurrently from Residential Single-Family (RSF) to Residential Multifamily-75 (RMF-75) or Residential Multifamily (RMF). As noted above, SMC 17C.110.215.C.1 provides only certain choices for maximum heights in RMF zones, including 35, 40, 55, 70, or 150 feet. As currently proposed a height maximum of 75 feet is inconsistent with the code requirements and would thus be inconsistent with this criterion. To remedy this situation, the proposed zoning would need to be modified to 70 or 150 feet. A maximum of 150 feet would exacerbate identified possible inconsistencies with these criteria, but a height of 70 feet would incrementally reduce those possible inconsistencies.

The proposal does not satisfy this criterion unless the proposal is amended to 70 feet maximum height.

## VII. CONCLUSION

The proposals have been processed and considered according to the requirements of the Spokane Municipal Code. Staff defers to the Plan Commission to make a determination at the time of the hearing as to the consistency of the original applicant's proposal with the final criteria for comprehensive plan amendments as provided in SMC 17G.020.030.

The expanded properties appear consistent with the final criteria in SMC 17G.020.030.

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

Staff has **no recommendation** for the original applicant's proposal.

Staff recommends the Plan Commission and City Council **approve** the proposal for the expanded properties.

## 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. Legal Descriptions                     |
| D. Proposed Zoning Map           | K. SEPA Checklist                         |
| E. Application Notification Area | L. SEPA Determination of Non-Significance |
| F. Detail Aerial                 | M. Agency Comments                        |
| G. Wide-Area Aerial              | N. Public Comments                        |

## Exhibits A and B

Existing and Proposed Land Use Plan Maps

**Application Z21-280COMP (W Cora Ave)**

**Concerning parcel(s) in the North Hill Neighborhood of Spokane**

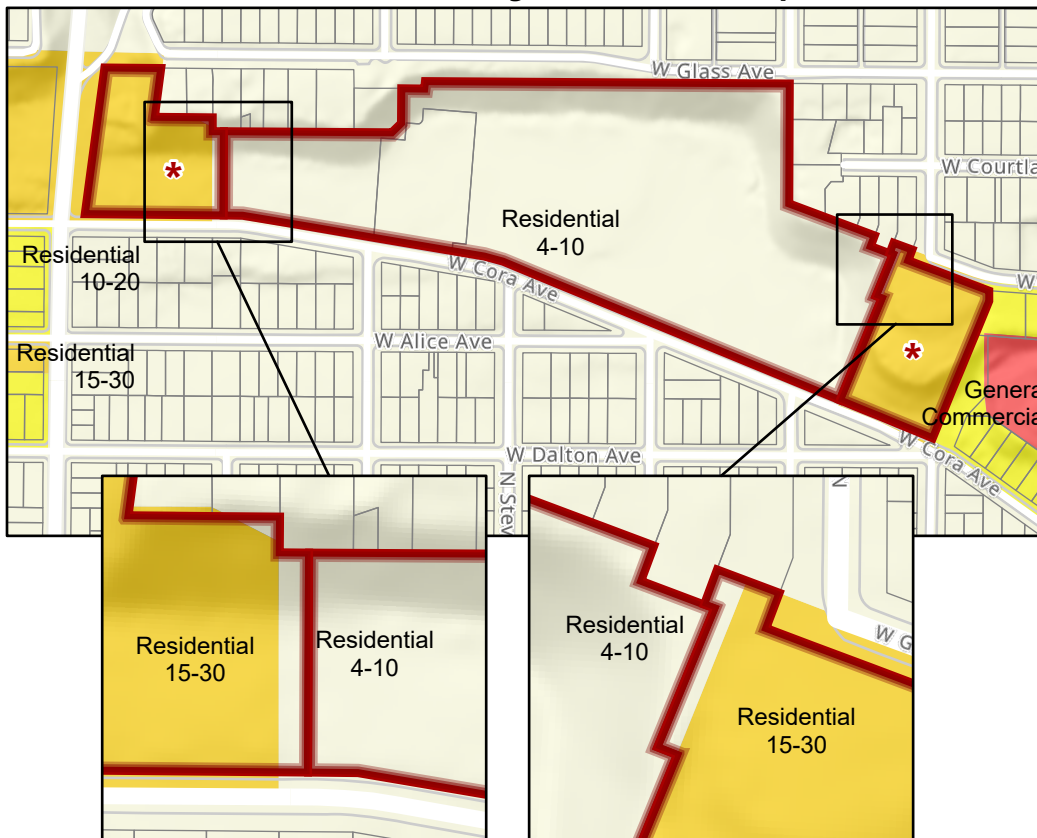
## 2022 Comprehensive Plan Amendment Proposals

Drawn: 5/17/2022

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

 City Boundary

## Application Parcels

Parcels

## Land Use Plan Designation

General Commercial

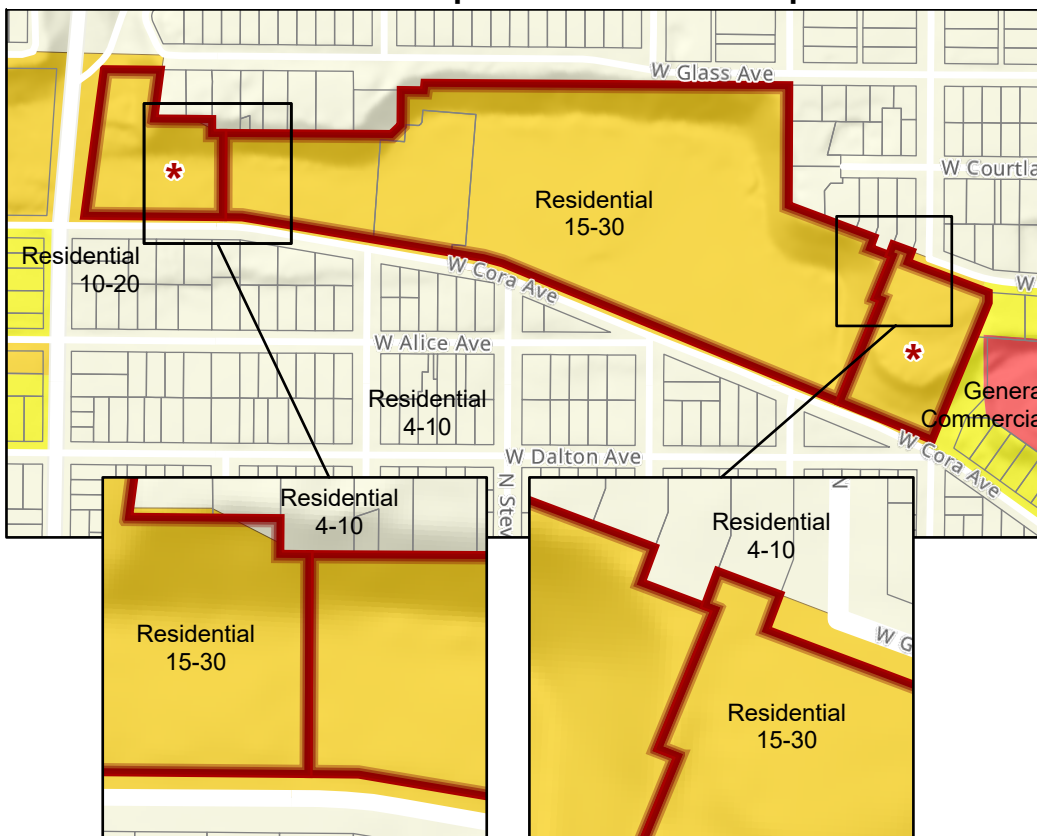
Residential 10-20

Residential 15-30

Residential 4-10

\* The Spokane City Council added portions of these parcels to the proposal.

## EXHIBIT B: Proposed Land Use Plan Map

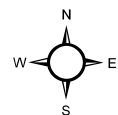


**Parcel(s):**

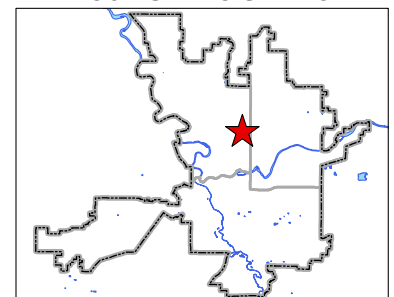
35064.3612, 35064.3613,  
and 35064.3801

**Approximate Area:**

19.1 Acres



## PROJECT LOCATION



Neighborhood and Planning Services  
Drawn By: Kevin Freibott

## Exhibits C and D

Existing and Proposed Zoning Maps



# Application Z21-280COMP (W Cora Ave)

Concerning parcel(s) in the North Hill Neighborhood of Spokane

2022 Comprehensive Plan Amendment Proposals

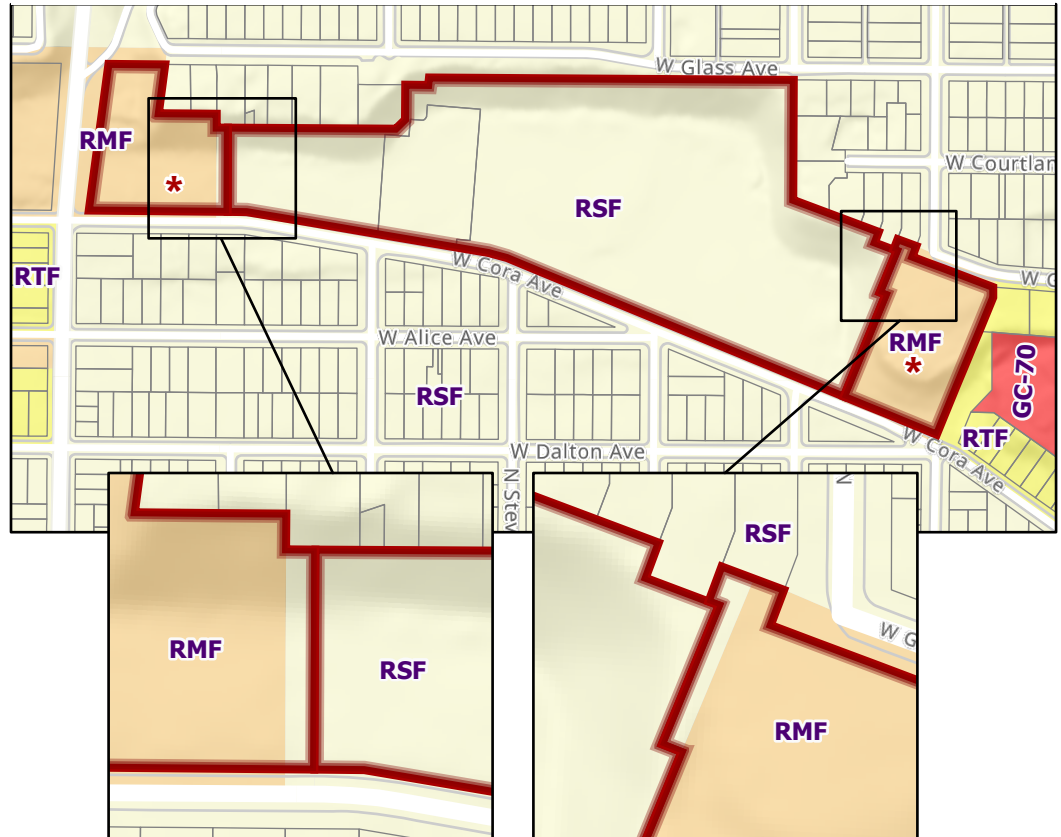
Drawn: 6/3/2022

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 C: Existing Zoning Map

- Parcels
- Application Parcels
- Proposed\_Zoning**
  - General Commercial
  - Residential Multifamily
  - Residential Single-Family
  - Residential Two-Family



\* The Spokane City Council added portions of these parcels to the proposal.

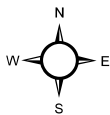
## EXHIBIT D: Proposed Zoning Map

### Parcel(s):

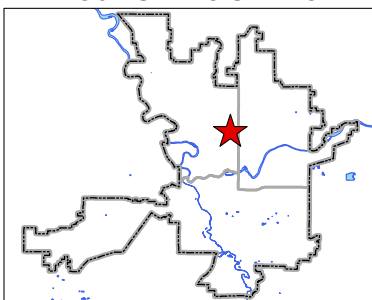
35064.3612, 35064.3613,  
35064.3801, and 35063.2005

### Approximate Area:

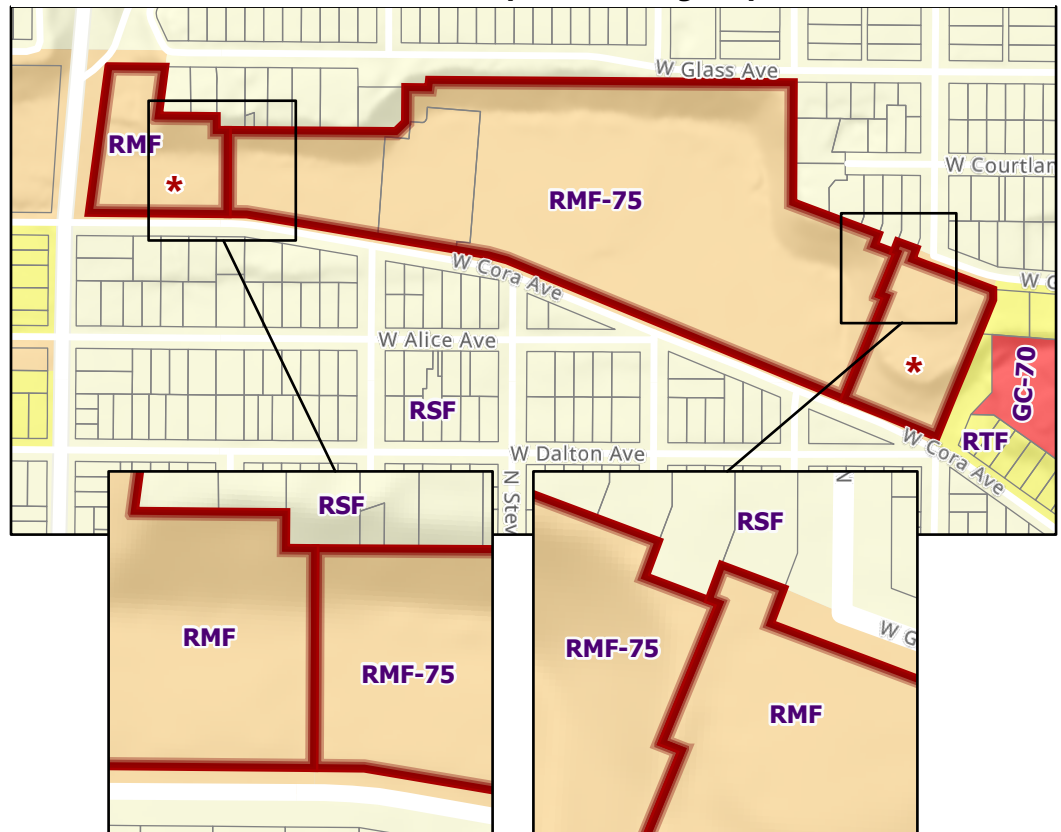
19.1 Acres



### PROJECT LOCATION



Neighborhood and Planning Services  
Drawn By: Kevin Freibott



## Exhibit E

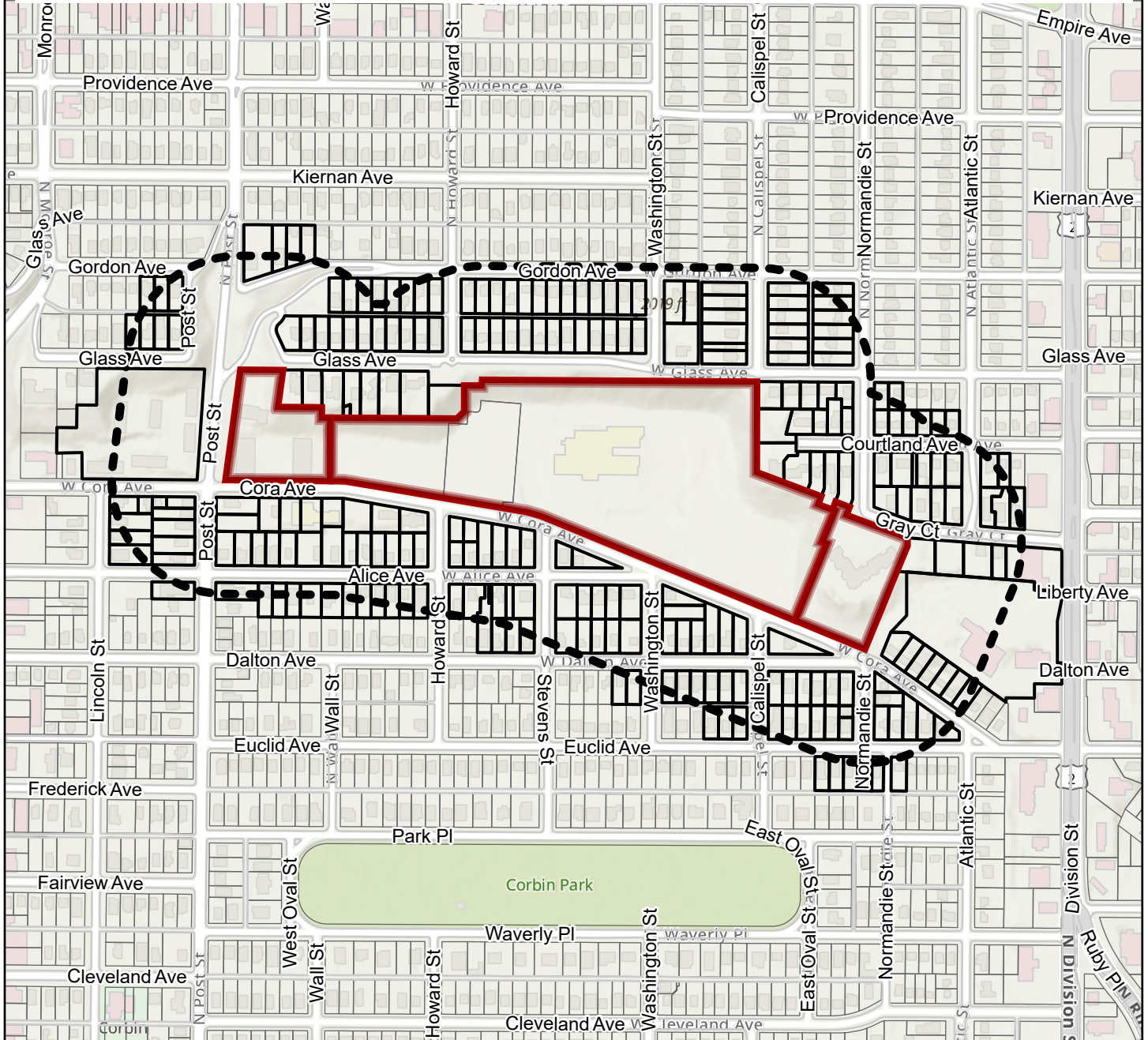
Application Notification Area



# **Z21-280COMP** **(W Cora Ave - North Hill Neighborhood)** 2022 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.

## **EXHIBIT E: Application Notification Area**

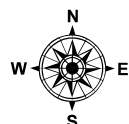


### **Legend**

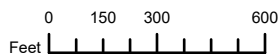
- Parcels to Change
- Parcels to Notify
- 400' Notification Area
- Other Parcels

### **Application Proposes To:**

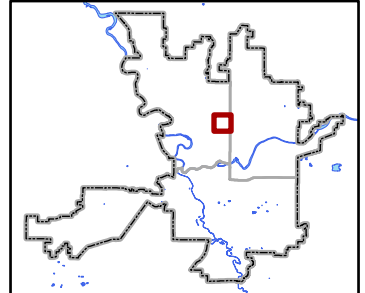
Change Land Use Plan Map Designation from  
"Residential 4-10" to "Residential 15-30"



Project Size: 19 Acres (Approximate)  
Drawing Date: 3/24/2022      Drawing Scale: 1:6,400



### **PROJECT LOCATION**



Neighborhood and Planning Services  
Drawn By: Kevin Freibott

## Exhibits F and G

Detail and Wide-Area Aerials



# Application Z21-280COMP (W Cora Ave) Concerning parcel(s) in the North Hill Neighborhood of Spokane

2022 Comprehensive Plan Amendment Proposals

Drawn: 6/3/2022

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.

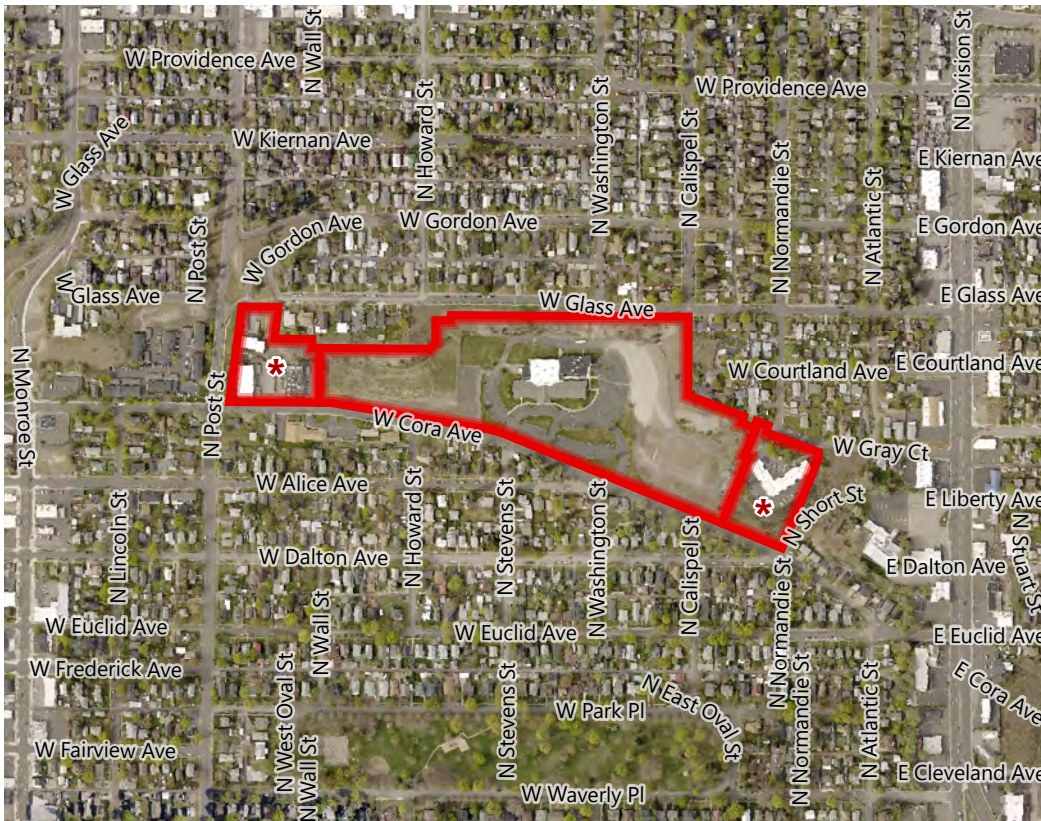
## EXHIBIT F: Detail Aerial



Subject Parcels

\* The Spokane City Council added portions of these parcels to the proposal.

## EXHIBIT G: Wide Area Aerial



Parcel(s):

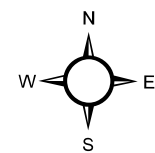
35064.3612, 35064.3613,  
35064.3801, and 35063.2005

Approximate Area of Change:

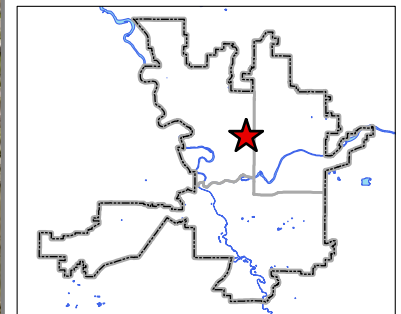
19.1 Acres

Photo Date:

April 26, 2020



## PROJECT LOCATION



Planning Services Department  
Drawn By: Kevin Freibott

## Exhibit H

### List of Relevant Comp Plan Policies



## 2021/2022 Comprehensive Plan Amendments

### EXHIBIT H: Z20-280COMP

Department of Neighborhood and Planning Services

The following policies of the Comprehensive Plan relate to application Z21-280COMP. The full text of the Comprehensive Plan can be found at [www.shapingspokane.org](http://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 3.1 Coordinated and Efficient Land Use

Encourage coordinated and efficient growth and development through infrastructure financing and construction programs, tax and regulatory incentives, and by focusing growth in areas where adequate services and facilities exist or can be economically extended.

*Discussion:* Future growth should be directed to locations where adequate services and facilities are available. Otherwise, services and facilities should be extended or upgraded only when it is economically feasible to do so.

The Centers and Corridors designated on the Land Use Plan Map are the areas of the city where incentives and other tools should be used to encourage infill development, redevelopment and new development. Examples of incentives the city could use include assuring public participation, using public facilities and lower development fees to attract investment, assisting with project financing, zoning for mixed-use and higher density development, encouraging rehabilitation, providing in-kind assistance, streamlining the permit process, providing public services, and addressing toxic contamination, among other things.

### LU 3.5 Mix of Uses in Centers

Achieve a proportion of uses in Centers that will stimulate pedestrian activity and create mutually reinforcing land uses

*Discussion:* Neighborhood, District, and Employment Centers are designated on the Land Use Plan Map in areas that are substantially developed. New uses in Centers should complement existing on-site and surrounding uses, yet seek to achieve a proportion of uses that will stimulate pedestrian activity and create mutually reinforcing land use patterns. Uses that will accomplish this include public, core commercial/office and residential uses.

All Centers are mixed-use areas. Some existing uses in designated Centers may fit with the Center concept; others may not. Planning for Centers should first identify the uses that do not fit and identify sites for new uses that are missing from the existing land use pattern. Ultimately, the mix of uses in a Center should seek to achieve the following minimum requirements:

TABLE LU 1 – MIX OF USES IN CENTERS		
Land Use	Neighborhood Center	District and Employment Center
Public	10 percent	10 percent
Commercial/Office	20 percent	30 percent
Higher-Density Housing	40 percent	20 percent

*Note: All percentage ranges are based on site area, rather than square footage of building area.*

This recommended proportion of uses is based on site area and does not preclude additional upper floors with different uses.

The ultimate mix of land uses and appropriate densities should be clarified in a site-specific planning process in order to address site-related issues such as community context, topography, infrastructure capacities, transit service frequency, and arterial street accessibility. Special care should be taken to respect the context of the site and the character of surrounding existing neighborhoods. The 10 percent public use component is considered a goal and should include land devoted to parks, plazas, open space, and public facilities.

#### LU 4.1 Land Use and Transportation

Coordinate land use and transportation planning to result in an efficient pattern of development that supports alternative transportation modes consistent with the Transportation Chapter and makes significant progress toward reducing sprawl, traffic congestion, and air pollution.

*Discussion:* The GMA recognizes the relationship between land use and transportation. It requires a transportation element that implements, and is consistent with, the land use element. The transportation element must forecast future traffic and provide information on the location, timing, and capacity needs of future growth. It must also identify funding to meet the identified needs. If probable funding falls short of needs, the GMA requires the land use element to be reassessed to ensure that needs are met.

#### LU 4.2 Land Uses that Support Travel Options and Active Transportation

Provide a compatible mix of housing and commercial uses in Neighborhood Centers, District Centers, Employment Centers, and Corridors.

*Discussion:* This provides opportunities for people to use active forms of transportation to get to work and shopping, enables less reliance on automobiles, reduces commuting times and distances, makes mass transit more viable, and provides greater convenience for area residents while supporting physical activity.

#### LU 4.6 Transit-Supported Development

Encourage transit-supported development, including a mix of employment, residential, and commercial uses, adjacent to high-performance transit stops.

*Discussion:* People are more likely to take transit to meet their everyday travel needs when transit service is frequent, at least every 15 minutes. Mixed-use development in these areas will enable less reliance on automobiles for travel, reduce parking needs, and support robust transit ridership. Land use regulations and incentives will encourage this type of development along high-performance transit corridors.

Transit-supported development should be encouraged through the application of development incentives, enhanced design measures, streetscape standards, parking standards, and potential changes in density and use. Each of these measures should be developed through a sub-area planning (or similar) process as each high-performance transit line is planned and developed. These sub-area planning processes should include neighborhood and stakeholder involvement and public participation processes to ensure that site-specific and neighborhood-context issues are addressed and benefits are maximized.

### 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 Housing Choice and Diversity

Goal: Provide opportunities for a variety of housing types that is safe and affordable for all income levels to meet the diverse housing needs of current and future residents.

#### 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 1.7 Socioeconomic Integration

Promote socioeconomic integration throughout the city.

*Discussion:* Socioeconomic integration includes people of all races, color, religion, sex, national origin, handicap, disability, economic status, familial status, age, sexual orientation, or other arbitrary factors. Often, housing affordability acts as a barrier to integration of all socioeconomic groups throughout the community.

#### H 1.9 Mixed-Income Housing

Encourage mixed-income developments throughout the city.

*Discussion:* Mixed-income housing provides housing for people with a broad range of incomes on the same site, development, or immediate neighborhood. Mixed income housing provides socioeconomic diversity that enhances community stability and ensures that low-income households are not isolated in concentrations of poverty.

#### 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 located and the associated transportation costs may provide a more realistic evaluation of housing affordability in the future.

### H 1.18 Distribution of Housing Options

Promote a wide range of housing types and housing diversity to meet the needs of the diverse population and ensure that this housing is available throughout the community for people of all income levels and special needs.

*Discussion:* A variety of housing types should be available in each neighborhood. Diversity includes styles, types, size, and cost of housing. Many different housing forms can exist in an area and still exhibit an aesthetic continuity. Development of a diversity of housing must take into account the context of the area and should result in an improvement to the existing surrounding neighborhood.

### 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 7 – Economic Development**

### ED 2.4 Mixed-Use

Support mixed-use development that brings employment, shopping, and residential activities into shared locations that stimulate opportunities for economic activity.

## **Chapter 8 – Urban Design and Historic Preservation**

### DP 1.2 New Development in Established Neighborhoods

Encourage new development that is of a type, scale, orientation, and design that maintains or improves the character, aesthetic quality, and livability of the neighborhood.

*Discussion:* New development should be compatible with the context of the area and result in an improvement to the surrounding neighborhood.

### DP 2.12 Infill Development

Encourage infill construction and area redevelopment that complement and reinforce positive commercial and residential character.

*Discussion:* Infill construction can benefit the community when done in a manner that improves and does not detract from the livability of the neighborhood and the desirable design character of the area.

#### DP 5.1 Neighborhood Participation

Encourage resident participation in planning and development processes that will shape or re-shape the physical character of their neighborhood.

*Discussion:* It is in the best interest of the broader community to maximize the desirability and stability of the city's individual neighborhoods. Neighborhood residents are the best equipped to determine what neighborhood design details and elements represent the particular characteristics of their specific area. As an example, residents are able to identify neighborhood features that are valued so they can be protected or enhanced as changes occur. This might include new development subject to review by the Design Review Board or updates to codes and policies that may affect a neighborhood.

### **Chapter 11 – Neighborhoods**

#### N 2.1 Neighborhood Quality of Life

Ensure that neighborhoods continue to offer residents transportation and living options, safe streets, quality schools, public services, and cultural, social, and recreational opportunities in order to sustain and enhance the vitality, diversity, and quality of life within neighborhoods.

*Discussion:* Spokane enjoys a rich variety of living opportunities within its individual neighborhoods, each with its unique character. Maintaining and enhancing our neighborhood assets is key to providing stability within neighborhoods and Spokane citizens with a prolonged sense of pride.

#### 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.

# Exhibit I

Application Materials



# General Application

Rev.20180104

## DESCRIPTION OF PROPOSAL

Rezone and Comprehensive Plan Amendment of parcel nos. 35064.3612 & 35064.3613 from RSF/Residential 4-10 (existing zoning and land use designation) to RMF-75/Residential 15-30 (proposed zoning and land use designations).

Amended by LJT, 03/22/2022

Address of Site Proposal (if not yet assigned, obtain address from Public Works before submitting application):

440 W Cora Ave, 516 W Cora Ave

## APPLICANT

Name: Storhaug Engineering (Liam J. Taylor)

Address: 510 E Third Ave, Spokane, WA 99202

Phone: 509-242-1000 Email: liamt@storhaug.com

## PROPERTY OWNER

Name: Faith Bible Church Mark Frankian (Amended by LJT, 03/22/2022)

Address: 440 W Cora Ave, Spokane, WA 99205

Phone: 509-326-9455 Email: mfrankian@fbchurch.org (Amended by LJT, 03/22/2022)

## AGENT

Name: Same as applicant.

Address: \_\_\_\_\_

Phone: \_\_\_\_\_ Email: \_\_\_\_\_

Assessor's Parcel Numbers: 35064.3612 & 35064.3613

Legal Description of Site: See attached.





# Comprehensive Plan or Land Use Code Amendment

Pre-Application

Rev.20180102

## DESCRIPTION OF THE PROPOSED AMENDMENT:

*(Please check the appropriate box(es))*

- |   |   |
|---|---|
| <input type="checkbox"/> Comprehensive Plan Text Change | <input checked="" type="checkbox"/> Land Use Designation Change |
| <input type="checkbox"/> Regulatory Code Text Change    | <input type="checkbox"/> Area-Wide Rezone                       |

**Please respond to these questions on a separate piece of paper. Incomplete answers may jeopardize your application's chances of being reviewed during this amendment cycle.**

### 1. General Questions *(for all proposals)*: See attached

- a. Summarize the general nature of the proposed amendment.
- b. Why do you feel this change is needed?
- c. In what way(s) is your proposal similar to or different from the fundamental concepts contained in the comprehensive plan?
- d. For text amendments: What goals, policies, regulations or other documents might be changed by your proposal?
- e. For map amendments:
  1. What is the current Land Use designation and zoning for each affected parcel?
  2. What is the requested Land Use designation and zoning for each affected parcel?
  3. Describe the land uses surrounding the proposed amendment site(s); e.g. land use type, vacant/occupied, etc.
- f. Do you know of any existing studies, plans or other documents that specifically relate to or support your proposal?
- g. Why did you decide to pursue a comprehensive plan amendment rather than address your concern through some other aspect of the Development Services department's work program (e.g. neighborhood planning, public input on new regulations, etc.)?
- h. Has there been a previous attempt to address this concern through a comprehensive plan amendment?
 

<input type="checkbox"/> Yes	<input type="checkbox"/> No
------------------------------	-----------------------------
- i. If yes, please answer the following questions:
  1. When was the amendment proposal submitted?
  2. Was it submitted as a consistent amendment or an inconsistent amendment?
  3. What were the Plan Commission recommendation and City Council decision at that time?
  4. Describe any ways that this amendment proposal varies from the previously considered version.

## Comprehensive Plan Amendment Pre-Application

Prepared by Storhaug Engineering, Liam J. Taylor

- a. Summarize the general nature of the proposed amendment.

**Proposal to change the Land Use Designation of parcel nos. 35064.3612 & 35064.3613 from Residential 4-10 (RSF) to Residential 15-30 (RMF-75). (Amended by LJT, 03/22/2022)**

- b. Why do you feel this change is needed?

**To allow for a greater number of residential units in the immediate vicinity of Centers and Corridor Core Land Use Designations (Monroe & Garland). Additionally, the property has adjacency to multifamily developments, both east and west.**

- c. In what way(s) is your proposal similar to or different from the fundamental concepts contained in the comprehensive plan?

**This is a proposal is consistent with section LU 1.4 Higher Density Residential Uses, which allows for expansion of existing multi-family residential areas where the existing [adjacent] land use is a predominantly higher density residential. Project site is also within 1/4 mile of the North Monroe Center and Corridor, as well as the Garland Ave Center and Corridor.**

- d. For text amendments: What goals, policies, regulations, or other documents might be changed by your proposal?

**This is not a proposed text amendment. The Land Use Plan Map and the Zoning Map of the City of Spokane will be changed to reflect this proposal upon approval.**

- e. For map amendments:

1. What is the current Land Use designation and zoning for each affected parcel?

**Land Use: Residential 4-10. Zoning: RSF**

2. What is the requested Land Use designation and zoning for each affected parcel?

**Land Use: Residential 15-30, Zoning: Land Use: Residential 15-30. Zoning: (RMF-75 (Amended by LJT, 03/22/2022))**

3. Describe the land uses surrounding the proposed amendment site(s); e.g. land use type, vacant/occupied, etc.

**Single-family housing, multi-family housing, institutional uses.**

- f. Do you know of any existing studies, plans or other documents that specifically relate to or support your proposal?

**Spokane Comprehensive Plan section LU 1.4 Higher Density Residential Uses supports this proposal by allowing for the expansion of existing multi-family residential areas where the existing land use is a predominantly higher density residential. Increased housing options and neighborhood-scale businesses of the North Monroe and Garland Ave Center and Corridors Core Land Use Designations will benefit from this Land Use Designation Change to Residential 15-30. (RMF-75) 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.**

**(Amended by LJT, 03/22/2022)**

- g. Why did you decide to pursue a comprehensive plan amendment rather than address your concern through some other aspect of the Development Services department's work program (e.g. neighborhood planning, public input on new regulations, etc.)?

**Rezones in the City of Spokane are processed through Comprehensive Plan Amendments.**

- h. Has there been a previous attempt to address this concern through a comprehensive plan amendment?

**No.**

- i. If yes please answer the following questions:

**N/A**



# Comprehensive Plan Amendments

## Threshold Review

### **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.

***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.
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.
3. The proposed amendment can be reasonably reviewed within the resources and time frame of the Annual Comprehensive Plan Amendment Work Program.
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?
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.
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.
7. If this change is directed by state law or a decision of a court or administrative agency, please describe.
8. Please provide copy of agenda or other documentation of outreach to neighborhood council made prior to application.

Planning & Development Services, 808 West Spokane Falls Boulevard, Spokane, WA 99201-3336  
[my.spokanecity.org](http://my.spokanecity.org) | Phone: 509.625.6300

(Rev Sept 2017)

## Comprehensive Plan Amendment Threshold Review

Prepared by Storhaug Engineering, Liam J. Taylor

1. Describe how the proposed amendment is appropriately addressed as a Comprehensive Plan Amendment.

**Land Use Designation Change in the City of Spokane is processed via a Comprehensive Plan Amendment.**

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.

**There are no ongoing work programs approved by the City Council, neighborhood, or subarea planning process that address this area and request.**

3. The proposed amendment can be reasonably reviewed within the resources and time frame of the Annual Comprehensive Plan Amendment Work Program.

**The Land Use Designation Change/Comprehensive Plan Amendment will affect only two parcels and can be reasonably reviewed within the resources and time frame of the Annual Comprehensive Plan Amendment Work Program.**

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?

**No efforts to reach out to surrounding property owners have been made. Efforts to contact and meet with the North Hill and Emerson Garfield Neighborhood Councils have been made.**

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 proposed amendment follows the guiding principles of the annual amendment process as found in SMC 17G.020.010.B, by following the correct procedure to change and improve the**

Comprehensive Plan, as well as change and improve the neighborhood and the city. The proposed amendment is also consistent with the policy implementation in the Countywide Planning policies, specifically Policy Topics 3 and 8, as well as the GMA planning goals, specifically goals 1, 2, 4, and 5. The proposal meets these goals by changing the Land Use Designation of mostly vacant land from Residential 4-10/Residential-Single Family (RSF) to Residential 15-30/Residential Multi-Family (**\*RMF-75**). This Land Use Designation Change will allow for multi-family units to be constructed as opposed single-family units in the immediate vicinity (within a 1/4 mile) of the North Monroe and Garland Center & Corridors Core Land Uses, which will increase the housing supply of the city, and promoting economic development (LU 1.4). The project also satisfies aspects of the Transportation/Housing chapters of the Comp Plan, by maximizing public benefits (goal G) by providing multifamily housing within close range (within a 1/4 mile) to multiple STA routes. Multifamily development offers a diverse range of fair housing (goal H 1.6) and provide mixed-income housing to potentially hundreds of people (goal H 1.9).

**\*Amended by LJT, 03/22/2022**

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 proposal is not the same as or substantially similar to a proposal that was considered in the previous year's threshold review process and was not included in the Annual Comprehensive Plan Amendment Work Program.**

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.

**Attached.**



# Notification Map

## Application

### DESCRIPTION OF PROPOSAL:

Re zone/Comp. Plan Amendment, Changing parcel nos.  
35064.3612 & 35064.3613 from RSE to \*RMF-75

### ADDRESS OF SITE OF PROPOSAL: (if not assigned yet, obtain address from Public Works before submitting application)

440 W Cora Ave, 516 W Cora Ave

### APPLICANT:

Name: Storhaug Engineering (Liam J. Taylor)

Address: 510 E Third Ave, Spokane, WA 99202

Phone (home):

Phone (work): 509-242-1000

Email address: [liamt@storhaug.com](mailto:liamt@storhaug.com)

### PROPERTY OWNER:

Name: Faith Bible Church (Mark Frankian (Amended by LJT, 03/22/2022))

Address: 440 W Cora Ave, Spokane 99205

Phone (home):

Phone (work): 509-326-9455

Email address: [mfrankian@fbchurch.org](mailto:mfrankian@fbchurch.org) (Amended by LJT, 03/22/2022)

### AGENT:

Name: Same as applicant

Address:

Phone (home):

Phone (work):

Email address:

### ASSESSOR'S PARCEL NUMBERS:

35064.3612 & 35064.3613

### LEGAL DESCRIPTION OF SITE:

See attached

### SIZE OF PROPERTY:

Approx. 18.87 acres

**LIST SPECIFIC PERMITS REQUESTED IN THIS APPLICATION:**

Rezone, Comp. Plan Amendment, SEPA


**DOES OWNER/APPLICANT OWN PROPERTY ADJACENT TO SUBJECT PROPERTY?**

If yes, provide all parcel numbers.

No.

I acknowledge, as a part of this application, that I am responsible for all notification requirements as described in SMC 17G.060. for public hearing and community meeting. Copies of these instructions are available from the Planning Services Department or on [www.spokaneplanning.org](http://www.spokaneplanning.org).

**SUBMITTED BY:**



☐ Applicant    ☐ Property Owner    ☐ Property Purchaser    ☒ Agent

## Exhibit J

### Legal Descriptions



## 2021/2022 Comprehensive Plan Amendments

### EXHIBIT J: Z20-280COMP

Department of Neighborhood and Planning Services

#### Legal Descriptions

The following properties would be affected, wholly or in part, by the proposed Comprehensive Plan Amendment:

##### Parcel 35063.2005

WHITINGS ADD & WHITINGS 2ND ADD RES I TO Y THAT PTN OF L TS6&7 BLK "G" E OF POST ST & PTN OF BLK "H" LYG E OF A LN DRWN PARA TO & 150FT E OF E LN OF POST ST INCL VAC STP N OF &ADJ THEREOF EXC NLY 130FT; ALSO THAT PTN BLK "H" LYG W OF ALN DRWN P ARA TO & 150FT E OF E LN OF POST ST INCL VAC STP NOF & ADJ WHITINGS ADD W30FT OF LT 16 BLK 30 RES OF BLKS ITO Y WHITIN GS 2ND ADD

##### Parcel 35064.3612

06-25-43: A PORTION OF THE PLAT OF RESURVEY OF BLOCKS I THROUGH Y OF WHITING'S SECOND ADDITION TO THE CITY OF SPOKANE FALLS RECORDED IN VOLUME D OF PLATS, PAGE 34, RECORDS OF SPOKANE COUNTY, WASHINGTON, WITHIN THE SOUTHWEST QUARTER OF THE SOUTHEAST QUARTER OF SECTION 6, TOWNSHIP 25 NORTH, RAGE 43 EAST, WILLAMETTE MERIDIAN, MORE PARTICULARLY DESCRIBED AS FOLLOWS: BEGINNING AT THE SOUTHEASTCORNER OF THE WEST 30FT OF LOT 16, BLOCK 30 OF SAID PLAT, SAID CORNER ALSO BEING ON THE NORTH RIGHT OF WAY LINE OF CORA AVENUE; THENCE N87°36'41"E ALONG SAID NORTH RIGHT OF WAY LINE, A DISTANCE OF 50.02FT; THENCE CONTINUING ALONG SAID NORTH RIGHT OF WAY LINE, S82°46'19"E 353.99FT; THENCE N01°59'42"E 268.06FT; THENCE S88°00'00"E 63.99FT; THENCE N02°00'00"E 45.50FT; THENCE S88°00'00"E 29FT TO A POINT OF CURVATURE; THENCE 20.42FT ALONG A TANGENT CURVE TO THE LEFT HAVING A RADIUS OF 13FT AND A DELTA OF 89°59'37" TO A POINT OF TANGENCY; THENCE N02°00'23"E 29FT; THENCE S88°00'00"E 141.05FT; THENCE S02°00'00"W 349.86FT; THENCE N88°13'01"W 35.15FT; THENCE S01°59'32"W 24.96FT TO SAID NORTH RIGHT OF WAY LINE; THENCE ALONG SAID NORTH RIGHT OF WAY LINE THE FOLLOWING TWO COURSES; S82°46'19"E 104.50FT; THENCE S70°44'04"E 993.13FT TO THE CENTERLINE OF VACATED NORMANDIE STREET; THENCE N19°01'46"E ALONG SAID CENTERLINE OF VACATED NORMANDIE STREET, A DISTANCE OF 287.27FT TO THE NORTHWESTERLY EXTENSION OF THE SOUTH LINE OF LOT 1, BLOCK 27 OF THE PLAT OF RESURVEY OF WHITING'S SECOND ADDITION TO THE TOWN OF SPOKANE FALLS RECORDED IN VOLUME A OF PLATS, PAGE 203, RECORDS OF SPOKANE COUNTY, WASHINGTON; THENCE N70°58'14"W ALONG SAID NORTHWESTERLY EXTENSION LINE, A DISTANCE OF 17FT TO THE SOUTHEASTERLY LINE OF LOT S OF SAID PLAT OF RESURVEY OF WHITING'S SECOND ADDITION TO THE TOWN OF SPOKANE FALLS; THENCE N19°01'46"E ALONG SAID SOUTHEASTERLY LINE, A DISTANCE OF 121.83FT TO THE SOUTH RIGHT OF WAY LINE OF VACATED GRAYS COURT; THENCE N72°00'04"W ALONG SOUTH RIGHT OF WAY, A DISTANCE OF 60.34FT; THENCE N17°59'56"E 30FT TO THE CENTERLINE OF SAID VACATED GRAYS COURT; THENCE N72°00'04"W ALONG SAID CENTERLINE, A DISTANCE OF 241.33FT TO THE CENTERLINE OF VACATED CALISPEL STREET; THENCE N02°24'04"W ALONG SAID CENTERLINE, A DISTANCE OF 321.86FT TO THE SOUTH RIGHT OF WAY LINE OF GLASS AVENUE; THENCE ALONG SAID SOUTH RIGHT OF WAY THE FOLLOWING THREE COURSES; S87°35'32"W 963.32FT; THENCE S05°06'03"W 21.55FT; THENCE S87°41'33"W 60.80FT TO THE NORTHEAST CORNER OF

LOT 2, BLOCK 29 OF SAID PLAT OF RESURVEY OF BLOCKS I THROUGH Y OF WHITING'S SECOND ADDITION TO THE CITY OF SPOKANE FALLS; THENCE S02°18'26"E ALONG THE EAST LINE OF SAID LOT 2, A DISTANCE OF 94.26FT; THENCE S42°39'40"W 35.37FT TO THE SOUTH LINE OF SAID LOT 2; THENCE S87°37'46"W ALONG SAID SOUTH LINE AND THE WESTERLY EXTENSION THEREOF, A DISTANCE OF 444.58FT TO THE NORTHEASTERLY CORNER OF THE AFOREMENTIONED WEST 30FT OF LOT 16, BLOCK 30; THENCE S02°30'17"E ALONG THE EAST LINE OF SAID WEST 30FT OF LOT 16, BLOCK 30, A DISTANCE OF 222.81FT TO THE POINT OF BEGINNING. (AFN 7076937)

**Parcel 35064.3613**

06-25-43: A PORTION OF THE PLAT OF RESURVEY OF BLOCKS I THROUGH Y OF WHITING'S SECOND ADDITION TO THE CITY OF SPOKANE FALLS RECORDED IN VOLUME D OF PLATS, PAGE 34, RECORDS OF SPOKANE COUNTY, WASHINGTON, WITHIN THE SOUTHWEST QUARTER OF THE SOUTHEAST QUARTER OF SECTION 6, TOWNSHIP 25 NORTH, RANGE 43 EAST, WILLAMETTE MERIDIAN, MORE PARTICULARLY DESCRIBED AS FOLLOWS: COMMENCING AT THE SOUTHEAST CORNER OF THE WEST 30FT OF LOT 16, BLOCK 30 OF SAID PLAT, SAID CORNER ALSO BEING ON THE NORTH RIGHT OF WAY LINE OF CORA AVENUE; THENCE N87°36'41"E ALONG SAID NORTH RIGHT OF WAY LINE A DISTANCE OF 50.20FT; THENCE CONTINUING ALONG SAID NORTH RIGHT OF WAY LINE, S82°46'19"E 353.99FT TO THE POINT OF BEGINNING; THENCE N01°59'42"E 268.06FT; THENCE S88°00'00"E 63.99FT; THENCE N02°00'00"E 45.50FT; THENCE S88°00'00"E 29FT TO A POINT OF CURVATURE; THENCE 20.42FT ALONG A TANGENT CURVE TO THE LEFT HAVING A RADIUS OF 13FT AND A DELTA OF 89°59'37" TO A POINT OF TANGENCY; THENCE N02°00'23"E 29FT; THENCE S88°00'00"E 141.05FT; THENCE S02°00'00"W 349.86FT; THENCE N88°13'01"W 35.15FT; THENCE S01°59'32"W 24.96FT TO SAID NORTH RIGHT OF WAY LINE; THENCE N82°46'19"W ALONG SAID NORTH RIGHT OF WAYLINE, A DISTANCE OF 212.76FT TO THE POINT OF BEGINNING. (AFN 7076937)

**Parcel 35064.3801**

WHITINGS 2ND RES TO Y L1 TO 16 B27 & VAC NORMANDIE ST 34F T WD WLY OF & ADJ L1 INC SLY 1/2 OF VAC GRAY CT 30FT WD NELY OF & A DJ SD VAC NORMANDIE ST & 17FT VAC STP W OF & ADJ L13 TO 16

# Exhibit K

## SEPA Checklist

**State Environmental Policy Act (SEPA)  
ENVIRONMENTAL CHECKLIST**File No.   Z21-280COMP  **PLEASE READ CAREFULLY BEFORE COMPLETING THE CHECKLIST!****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.

**Note from City of Spokane Staff:**

The proposal classified as File Z21-280COMP has been expanded by Spokane City Council, adding 2 parcels and an area of approximately 0.21 acres to the project area.

The properties added to the proposal by City Council include:

Parcel	Address
35063.2005	3426 N. Post St.
35064.3801	139 W. Gray Ct.

Where necessary, **boxes with red text** have been added to the SEPA Checklist to account for additional relevant information necessary for evaluating the environment impact of the expanded proposal. These additions have been inserted by City staff and concern only the expanded parcels listed above.

Evaluation for  
Agency Use Only

**A. BACKGROUND**

1. Name of proposed project: \_\_\_\_\_

2. Applicant: \_\_\_\_\_

3. Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_ Phone: \_\_\_\_\_

Agent or Primary Contact: \_\_\_\_\_

Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_ Phone: \_\_\_\_\_

Location of Project: \_\_\_\_\_

Address: \_\_\_\_\_

Section: \_\_\_\_\_ Quarter: \_\_\_\_\_ Township: \_\_\_\_\_ Range: \_\_\_\_\_

Tax Parcel Number(s) \_\_\_\_\_

See the note on  
page 2 for  
expanded property  
addresses and  
parcel numbers

4. Date checklist prepared: \_\_\_\_\_

Checklist revised: 4/14/22

5. Agency requesting checklist: \_\_\_\_\_

6. Proposed timing or schedule (including phasing, if applicable): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

7. a. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

b. Do you own or have options on land nearby or adjacent to this proposal? If yes, explain. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Evaluation for  
Agency Use Only

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. \_\_\_\_\_

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10. List any government approvals or permits that will be needed for your proposal, if known. \_\_\_\_\_

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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. \_\_\_\_\_

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12. Location of the proposal: Give sufficient information for 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. \_\_\_\_\_

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See the note on page 2 for expanded property addresses and parcel numbers. Legal descriptions are available upon request.

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.) \_\_\_\_\_

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The proposed action does not lie within the Priority Sewer Service Area. It lies within the other three boundaries indicated.

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). \_\_\_\_\_

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- (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? \_\_\_\_\_

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- (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. \_\_\_\_\_

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- (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? \_\_\_\_\_

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Evaluation for  
Agency Use Only

## b. Stormwater

(1) What are the depths on the site to groundwater and to bedrock (if known)? \_\_\_\_\_

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

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**B. ENVIRONMENTAL ELEMENTS****1. Earth**

a. General description of the site (check one):

☐ Flat   ☐ Rolling   ☐ Hilly   ☐ Steep slopes   ☐ Mountainous

Other: \_\_\_\_\_

Parcel 35063.2005 is mostly flat to the south, with a 75' bluff in the northern half. Parcel 35064.3801 contains steep slopes with approximately 70' in elevation change.

b. What is the steepest slope on the site (approximate percent slope)? \_\_\_\_\_

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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 agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils. \_\_\_\_\_

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d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. \_\_\_\_\_

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Evaluation for  
Agency Use Only

- e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt, or buildings)? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- h. Proposed measures to reduce or control erosion or other impacts to the earth, if any: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## 2. Air

- a. What type of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Evaluation for  
Agency Use Only

c. Proposed measures to reduce or control emissions or other impacts to air, if any: \_\_\_\_\_

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**3. Water**

a. SURFACE WATER:

(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. \_\_\_\_\_

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(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. \_\_\_\_\_

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(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. \_\_\_\_\_

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(4) Will the proposal require surface water withdrawals or diversions? If yes, give general description, purpose, and approximate quantities if known. \_\_\_\_\_

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Evaluation for  
Agency Use Only

(5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. \_\_\_\_\_

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(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. \_\_\_\_\_

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b. GROUNDWATER:

(1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known. \_\_\_\_\_

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(2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve. \_\_\_\_\_

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Evaluation for  
Agency Use Only

## 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. \_\_\_\_\_

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

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- (3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe. \_\_\_\_\_

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

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**4. Plants**

- a. Check the type of vegetation found on the site:

Deciduous tree: ☐ alder ☐ maple ☐ aspen

Other: \_\_\_\_\_

Evergreen tree: ☐ fir ☐ cedar ☐ pine

Other: \_\_\_\_\_

☐ Shrubs ☐ Grass ☐ Pasture ☐ Crop or grain☐ Orchards, vineyards or other permanent cropsWet soil plants: ☐ cattail ☐ buttercup ☐ bullrush ☐ skunk cabbage

Other: \_\_\_\_\_

Water plants: ☐ water lily ☐ eelgrass ☐ milfoil

Other: \_\_\_\_\_

Other types of vegetation: \_\_\_\_\_

- b. What kind and amount of vegetation will be removed or altered? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- c. List threatened and endangered species known to be on or near the site. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Evaluation for  
Agency Use Only

- e. List all noxious weeds and invasive species known to be on or near the site. \_\_\_\_\_

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## 5. Animals

- a. Check *and* List any birds and other animals which have been observed on or near the site or are known to be on or near the site:

Birds: ☐ hawk ☐ heron ☐ eagle ☐ songbirds

Other: \_\_\_\_\_

Mammals: ☐ deer ☐ bear ☐ elk ☐ beaver

Other: \_\_\_\_\_

Fish: ☐ bass ☐ salmon ☐ trout ☐ herring ☐ shellfish

Other: \_\_\_\_\_

Other (not listed in above categories): \_\_\_\_\_

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

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

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

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Evaluation for  
Agency Use Only

- e. List any invasive animal species known to be on or near the site. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## 6. Energy and natural resources

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

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

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- 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: \_\_\_\_\_

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## 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. \_\_\_\_\_

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Evaluation for  
Agency Use Only

(1) Describe any known or possible contamination at the site from present or past uses. \_\_\_\_\_

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(2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity. \_\_\_\_\_

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(3) Describe any toxic or hazardous chemicals/conditions that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project. \_\_\_\_\_

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(4) Describe special emergency services that might be required. \_\_\_\_\_

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

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Evaluation for  
Agency Use Only

b. NOISE:

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

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(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. \_\_\_\_\_

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(3) Proposed measure to reduce or control noise impacts, if any: \_\_\_\_\_

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Both expansion parcels currently contain multifamily residential development. Existing urban uses would not be affected by similar urban uses if these parcels were to redevelop.

**8. Land and shoreline use**

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe. \_\_\_\_\_

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b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use? \_\_\_\_\_

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Evaluation for  
Agency Use Only

- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how: \_\_\_\_\_

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- c. Describe any structures on the site. \_\_\_\_\_

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Both expansion parcels currently contain multifamily residential and parking structures.

- d. Will any structures be demolished? If so, which? \_\_\_\_\_

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There are no current plans to redevelop the expanded area.

- e. What is the current zoning classification of the site? \_\_\_\_\_

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Both expansion parcels are currently split-zoned Residential Single Family and Residential Multi-Family. Pending Comprehensive Plan amendment would designate the parcels entirely Residential Multi-Family.

- f. What is the current comprehensive plan designation of the site? \_\_\_\_\_

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Both expansion parcels are currently designated Residential 15-30 for most of the parcel, but have small sections designated Residential 10-20. Pending Comprehensive Plan amendment would designate the parcels entirely Residential 15-30.

- g. If applicable, what is the current shoreline master program designation of the site? \_\_\_\_\_

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Evaluation for  
Agency Use Only

h. Has any part of the site been classified as a critical area by the city or the county? If so, specify. \_\_\_\_

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i. Approximately how many people would reside or work in the completed project? \_\_\_\_\_

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j. Approximately how many people would the completed project displace? \_\_\_\_\_

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k. Proposed measures to avoid or reduce displacement impacts, if any: \_\_\_\_\_

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l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: \_\_\_\_\_

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m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any: \_\_\_\_\_

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Evaluation for  
Agency Use Only**9. Housing**

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. \_\_\_\_\_

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- b. Approximately how many units, if any, would be eliminated? Indicate whether high-, middle- or low-income housing. \_\_\_\_\_

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- c. Proposed measures to reduce or control housing impacts, if any: \_\_\_\_\_

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**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? \_\_\_\_\_

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- b. What views in the immediate vicinity would be altered or obstructed? \_\_\_\_\_

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- c. Proposed measures to reduce or control aesthetic impacts, if any: \_\_\_\_\_

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Evaluation for  
Agency Use Only

### 11. Light and Glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur? \_\_\_\_\_

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- b. Could light or glare from the finished project be a safety hazard or interfere with views? \_\_\_\_\_

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- c. What existing off-site sources of light or glare may affect your proposal? \_\_\_\_\_

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- d. Proposed measures to reduce or control light and glare impacts, if any: \_\_\_\_\_

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### 12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity? \_\_\_\_\_

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- b. Would the proposed project displace any existing recreational uses? If so, describe. \_\_\_\_\_

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- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: \_\_\_\_\_

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**13. Historic and cultural preservation**

- a. Are there any buildings, structures, or sites, located on or near the sited that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe. \_\_\_\_\_

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- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. \_\_\_\_\_

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- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archaeology and historic preservation, archaeological surveys, historic maps, GIS data, etc. \_\_\_\_\_

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- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required \_\_\_\_\_

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**14. Transportation**

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any. \_\_\_\_\_

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- b. Is site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop \_\_\_\_\_

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- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? \_\_\_\_\_

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- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private). \_\_\_\_\_

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- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail or air transportation? If so, generally describe. \_\_\_\_\_

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Evaluation for  
Agency Use Only

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and non-passenger vehicles). What data or transportation models were used to make these estimates? \_\_\_\_\_

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

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, general describe. \_\_\_\_\_

- h. Proposed measures to reduce or control transportation impacts, if any: \_\_\_\_\_

### 15. Public services

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe. \_\_\_\_\_

- b. Proposed measures to reduce or control direct impacts on public services, if any: \_\_\_\_\_

## 16. Utilities

a. Check utilities currently available at the site:

- ☐ electricity
- ☐ natural gas
- ☐ water
- ☐ refuse service
- ☐ telephone
- ☐ sanitary sewer
- ☐ septic 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: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Evaluation for  
Agency Use Only

### 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: \_\_\_\_\_ Signature: *Leam J Taylor*

***Please Print or Type:***

Proponent: \_\_\_\_\_ Address: \_\_\_\_\_

Phone: \_\_\_\_\_

Person completing form (if different from proponent): \_\_\_\_\_

Phone: \_\_\_\_\_ Address: \_\_\_\_\_

#### FOR STAFF USE ONLY

Staff member(s) reviewing checklist: Kara Frashefski

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? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Proposed measures to avoid or reduce such increases are: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

Evaluation for  
Agency Use Only

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? \_\_\_\_\_

\_\_\_\_\_

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

\_\_\_\_\_

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? \_\_\_\_\_

\_\_\_\_\_

Proposed measures to avoid or reduce shoreline and land use impacts are: \_\_\_\_\_

\_\_\_\_\_

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

\_\_\_\_\_

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

\_\_\_\_\_

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

\_\_\_\_\_

Evaluation for  
Agency Use Only

## 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: \_\_\_\_\_ Signature: Liam J. Taylor

**Please Print or Type:**

Proponent: \_\_\_\_\_ Address: \_\_\_\_\_

Phone: \_\_\_\_\_

Person completing form (if different from proponent): \_\_\_\_\_

Phone: \_\_\_\_\_ Address: \_\_\_\_\_

**FOR STAFF USE ONLY**

Staff member(s) reviewing checklist: Kara Frashefski

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 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.

## Exhibit L

SEPA Determination of Non-Significance

## NONPROJECT DETERMINATION OF NONSIGNIFICANCE

**FILE NO(S):** Z21-280COMP

**PROPONENT:** Faith Bible Church (Agent: Liam Taylor, Storhaug Engineering) & the City of Spokane

**DESCRIPTION OF PROPOSAL:** Amendment of the Land Use Plan Map designation for four parcels totaling approximately 20.08 acres from "Residential 4-10" to "Residential 15-30" and a concurrent change of zoning from "Residential Single Family (RSF)" to "Residential Multifamily" (RMF) or "Residential Multifamily, 75-foot height limit" (RMF-75).

**LOCATION OF PROPOSAL, INCLUDING STREET ADDRESS, IF ANY:** The proposal concerns four parcels: 35064.3612, 35064.3613, 35063.2005, and 35064.3801, located at 440 & 516 W. Cora Ave., 3426 N. Post St., and 139 W. Gray Ct.; north side of W Cora Avenue between N Division St and N Post St; North Hill neighborhood.

**LEGAL DESCRIPTION:** Legal descriptions of all subject properties are available by contacting the City of Spokane. Located in SW06-25-43

**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 13, 2022 if they are intended to alter the DNS.

\*\*\*\*\*

**Responsible Official:** Spencer Gardner

**Position/Title:** Director, Planning Services **Phone:** (509) 625-6500

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

**Date Issued:** Aug 23, 2022 **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 October 19, 2021 (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.

\*\*\*\*\*

## Exhibit M

### Agency Comments

May 2, 2022

Kara Frashetski  
Assistant Planner I  
City of Spokane  
Community and Economic Development  
808 W. Spokane Falls Blvd.  
Spokane, WA 99201

RE: **Z21-280 COMP COMPREHENSIVE PLAN AMENDMENT – 440 & 516 W CORA AVE**

Dear Ms. Frashetski,

Spokane Transit has reviewed the proposed amendment of the Land Use Plan Map designation for two complete parcels and portions of two others, totaling 19.08 acres, from “Residential 4-10” to “Residential 15-30” and a concurrent change of zoning from “Residential Single Family” to “Residential Multifamily.”

Given the proximity of the parcels to the proposed Division BRT line, as well as the Monroe-Regal High Performance Transit line, Spokane Transit fully supports the proposed changes to the land use plan map and zoning designations. Increasing opportunities for mixed use or multifamily development near transit is a benefit to the City and its residents. We applaud the City of Spokane for updating their Comprehensive Plan, and STA looks forward to continued work with the City in the future.

Regards,



Karl Otterstrom, AICP  
Chief Planning and Development Officer

cc: E. Susan Meyer, CEO

April 28, 2022

Kara Frashefski  
Assistant Planner I  
City of Spokane  
Planning Services  
808 W Spokane Falls Blvd.  
Spokane, WA 99201

RE: City of Spokane Proposed Comprehensive Plan Amendments

Dear Kara:

Thank you for the opportunity to review and comment on the City of Spokane's comprehensive plan amendments: Z22-098COMP, Z21-280COMP, Z21-281COMP, and Z21-282COMP. SRTC staff has reviewed the notices and materials provided. SRTC's requirements for reviewing and certifying comprehensive plans is outlined in [SRTC's Plan Review and Certification Process Instruction Manual](#).

Based on the information provided for the proposed comprehensive plan changes, SRTC has determined that the proposed amendments are generally consistent with the relevant policies and principles of [Horizon 2045](#), the Regional Transportation Plan (RTP) as well as with the relevant transportation planning requirements of the Revised Code of Washington ([RCW](#)), including the Growth Management Act ([GMA](#)).

In the future, SRTC would like to be able to provide a more comprehensive analysis of regional impacts. If a development proposal is submitted as a result of a comprehensive plan amendment, SRTC may conduct a regional level of service (LOS) analysis for the regional mobility corridors. To that end, we look forward to working with the City of Spokane to discuss opportunities for SRTC to provide the analysis.

Please contact me if you need any additional information about our review of these amendment proposals.

Sincerely,

*Ryan Stewart*

Ryan Stewart, AICP  
Principal Transportation Planner

SRTC MEMBER AGENCIES

- City of Airway Heights • City of Cheney • City of Deer Park • City of Medical Lake • City of Millwood • City of Spokane
- City of Spokane Valley • Kalispel Tribe of Indians • Spokane County • Spokane Transit Authority • Spokane Tribe of Indians
- Town of Fairfield • Town of Latah • Town of Rockford • Town of Spangle • Town of Waverly
- Washington State Dept of Transportation • Washington State Transportation Commission



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

4601 N. Monroe Street • Spokane, Washington 99205-1295 • (509) 329-3400  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

April 28, 2022

Kara Frashefski  
Planner  
City of Spokane  
10210 East Sprague Avenue  
Spokane Valley, WA 99206

Re: Comprehensive Plan Land Use Map Amendment - Faith Bible Church  
File: Z21-280COMP

Dear Kara Frashefski:

Thank you for the opportunity to provide comments regarding Comprehensive Plan Land Use Map Amendment - Faith Bible Church project (Proponent: Storhaug Engineering). After reviewing the documents, the Department of Ecology (Ecology) submits the following comments:

**Water Quality Program-Shannon Adams (509) 329-3610**

Construction activities may require a Construction Stormwater General Permit.

For more information in obtaining a Construction Stormwater General Permit, or for other technical assistance, please contact Shannon Adams at (509) 329-3610 or via email at [Shannon.Adams@ecy.wa.gov](mailto:Shannon.Adams@ecy.wa.gov).

**State Environmental Policy Act (SEPA)-Cindy Anderson (509) 655-1541**

Ecology bases comments upon information submitted for review. As such, comments made do not constitute an exhaustive list of the various authorizations you may need to obtain, nor legal requirements you may need to fulfill in order to carry out the proposed action. Applicants should remain in touch with their Local Responsible Officials or Planners for additional guidance.

For information on the SEPA Process, please contact Cindy Anderson at (509) 655-1541 or via email at [Cindy.Anderson@ecy.wa.gov](mailto:Cindy.Anderson@ecy.wa.gov).

For more guidance on, or to respond to the comments made by Ecology, please contact the appropriate staff listed above at the phone number or email provided.

Department of Ecology  
Eastern Regional Office  
(Ecology File: 202201808)

## Exhibit N

Public Comments

**From:** [Chris Barclay](#)  
**To:** [Freibott, Kevin](#)  
**Subject:** Comments regarding Z21-280COMP 440 & 516 W Cora Ave  
**Date:** Thursday, June 23, 2022 5:29:13 PM

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

**Re: Z21-280COMP**  
**Address: 440&516 W Cora Ave**

**Hello!**

**I am a homeowner at 3110 N Calispel. My address is within visual distance of the mentioned properties. I am a 40 year resident of the Corbin Park neighborhood. My mother owns a house in the neighborhood as does my sister.**

**The property in question should not be rezoned or developed. Reasons follow.**

- 1. The Corbin Park area is a high density historic neighborhood. A large multi-family housing unit(s) would detract from property values and quality of life for the existing home owners.**
- 2. Access to Cora from Post is in the middle of a steep hill. In the winter ingress and egress here is dangerous. The corder visibility is poor.**
- 3. Access to Cora from Division down Euclid is a complex, blind 3 way intersection of Atlantic, Cora, Euclid. The Euclid hill is not passible when there is snow on the road and the turns left and right onto division are blind and not able to be rectified.**
- 4. The remaining egress is over surface streets, through the neighborhood. This is an already auto crowded area.**
- 5. The existing Multi-Family housing on Cora is already a strain on the neighborhood. Vandalism and crime is prevalent in those areas.**
- 6. The property in question was a trailer park for a reason. That part of the property is not buildable. When the church bought the property, the price was low because of this fact. The church built on the only stable ground. The rest is all sand.**
- 7. The electrical infrastructure in the area is old. We had a blackout just last summer. Adding the large drain of an apartment building or complex will exacerbate the problem.**
- 8. The sewer and water infrastructure have not been redeveloped to accommodate residential housing of that magnitude**
- 9. The Emerson-Garfield area is dense enough. Spokane and several areas that do not require rezoning and do not have a high density population established**
- 10. Bus service requires a difficult walk up the Euclid hill or the long walk down to the Monroe street stop 9 blocks away with limited sidewalks and no snow removal. ADA compliance would be impossible**
- 11. The project will likely result in legal action.**
- 12. This project is not well conceived. Please redirect the cities efforts elsewhere and decline the rezoning.**

**Thank you for allowing comment.**

**Chris Barclay**  
**3110 N. Calispel St.**  
**Spokane, WA 99205**  
**1-509-220-5772**

Sent from [Mail](#) for Windows

Chris Barclay, CPCU, AFIS, ARe  
Senior Product Manager,  
WSRB  
P: 206-273-7172  
F: 206-217-9329

***Providing [emerging risk](#) information that matters.***



**[Web](#) | [Blog](#) | [vCard](#) | [Email](#)**

**From:** [Wendy H Bauer](#)  
**To:** [Planning & Development Services Comp Plan](#)  
**Subject:** Cora Avenue Comprehensive Plan Amendment  
**Date:** Monday, July 25, 2022 2:57:41 PM

---

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

We are writing in strong opposition to the Cora Avenue Comprehensive Plan Amendment.

As stated in Chapter 3 of the City of Spokane Comprehensive Plan (Chapter 3--Land Use (LU 1-3)): "The City's residential neighborhoods are one of its most valuable assets. They are worthy of protection from the intrusion of incompatible land use." One of the stated goals of the Plan is to "[p]rotect the character of single-family residential neighborhoods by focusing higher density land uses in designated Centers and Corridors."

The Cora Ave. area is neither along a corridor (Monroe nor Division), nor is it in a Center such as the Garland District. Adding high-density residential development there would totally change the character of the neighborhood along Cora Avenue. The construction of duplexes or townhouses would make sense for providing additional housing without substantially altering the character of the neighborhood, but the construction of big apartment complexes would have an extremely detrimental effect on the area. The currently existing Northwood Apartments are along the Post Street arterial. Cora Ave. is a residential street, not an arterial.

The Cora/Post street intersection could not handle the vehicle traffic from high-density population. For those using public transportation, bus access from the western side of the area would be through Alice and Cora Avenues to Monroe Street. This is an extremely high crime area. Since the first of this year there have been at least three people shot on Alice Street west of Post. One Sunday morning in April at about 7 AM one of us (Tom) heard twelve gunshots fired, followed by nine more. The Spokane Police Department investigated this scene for several hours.

We bought the duplex at 709 W Glass Ave in the summer of 2013. One of our primary reasons for buying this property is the outstanding view of downtown Spokane. High-rise apartments on Cora Ave. could ruin the spectacular view along Glass Avenue.

We strongly encourage that this amendment be defeated, in order to protect the ambience of the residential neighborhood along Cora Avenue.

Sincerely,

Tom and Wendy Bauer

## Freibott, Kevin

---

**From:** Wendy H Bauer <wbauer@wellesley.edu>  
**Sent:** Tuesday, July 26, 2022 10:37 AM  
**To:** Freibott, Kevin  
**Cc:** Thomas J Bauer; Downey, KayCee; Black, Tirrell; Owen, Melissa  
**Subject:** Re: Cora Avenue rezoning info request

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Dear Kevin,

Thank you for your quick response. After sending my questions to Melissa, I was able to find out what the land use change meant, but not the rezoning change, and we did submit an e-mail comment yesterday during the public comment period. Had we fully understood what the rezoning change meant, along with the height of the bluff, we would have included far more concern about the impact of high-rise buildings for the view along Glass Avenue.

Sincerely,  
Wendy Bauer

On Tue, Jul 26, 2022 at 10:19 AM Freibott, Kevin <[kfreibott@spokanecity.org](mailto:kfreibott@spokanecity.org)> wrote:

Good morning, Wendy. It looks like you have some questions about file [Z21-280COMP](#). I'm happy to help you out. There are two things proposed to change here, one is the land use and one is the zoning. The land use is proposed to go from Residential 4-6 (that's 4 to 6 dwellings per acre) to Residential 15-30 (that's 15 to 30 dwellings per acre). The applicant has also requested a zoning change from Residential Single-Family (RSF) to Residential Multi-Family (RMF) 75, which means a maximum height of 75 feet (normally it's only 35 feet for residential zones). The bluff right now is about 80 feet high, with some variation along its length.

I hope that helps. The public comment period ended yesterday, but please feel free to send any written comments you have my way and I'll be sure to include them in the record. I will also make sure they go to the Plan Commission and the City Council prior to their hearings on the proposals, scheduled for later this year.

Thanks and have a great day! Stay cool out there.

Kevin



Kevin Freibott, MA ORGL | Associate Planner | City of Spokane - Planning and Economic Development

509.625-6184 | <mailto:kfreibott@spokanecity.org> | [spokanecity.org](http://spokanecity.org) | [spokaneplanning.org](http://spokaneplanning.org)



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**From:** Owen, Melissa <[mowen@spokanecity.org](mailto:mowen@spokanecity.org)>

**Sent:** Tuesday, July 26, 2022 8:15 AM

**To:** 'Wendy H Bauer' <[wbauer@wellesley.edu](mailto:wbauer@wellesley.edu)>; Downey, KayCee <[kdowney@spokanecity.org](mailto:kdowney@spokanecity.org)>; Freibott, Kevin <[kfreibott@spokanecity.org](mailto:kfreibott@spokanecity.org)>; Black, Tirrell <[tblack@spokanecity.org](mailto:tblack@spokanecity.org)>

**Cc:** Thomas J Bauer <[tjabauer@gmail.com](mailto:tjabauer@gmail.com)>

**Subject:** RE: Cora Avenue rezoning info request

Wendy – I've included the long range planners that is working on the comprehensive plan amendments that include the proposed rezone. They should be able to answer your questions about the proposed zone change. Thank you.



Melissa Owen | City of Spokane | Planning & Development Services

509.625.6063 | [mowen@spokanecity.org](mailto:mowen@spokanecity.org)



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**From:** Wendy H Bauer <[wbauer@wellesley.edu](mailto:wbauer@wellesley.edu)>

**Sent:** Sunday, July 24, 2022 3:17 PM

**To:** Owen, Melissa <[mowen@spokanecity.org](mailto:mowen@spokanecity.org)>

**Cc:** Thomas J Bauer <[tjabauer@gmail.com](mailto:tjabauer@gmail.com)>

**Subject:** Cora Avenue rezoning info request

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Dear Melissa,

Julia Shepherd-Hall of the Garland District suggested your name as a resource.

My husband and I would like to comment on the proposed rezoning of the Cora Avenue Comprehensive Plan Amendment (<https://my.spokanecity.org/projects/2021-2022-proposed-comprehensive-plan-amendments/cora-avenue/>) but have been unable to find out just what "Residential 4-10" and "Residential 15-30" and "Residential Multifamily -75" actually mean. If the "75" means that an apartment building could be 75 feet high, one built below the bluff might actually clear the top of the bluff. Or does the 75 have to do with the number of potential units in a building? We'd like to really find out what's being planned before writing.

Thank you so much for any information you can give us.

Sincerely,

Wendy and Tom Bauer

----- Original Message -----

From: ALVAN BEHAR <[behar8racing@comcast.net](mailto:behar8racing@comcast.net)>

To: "<[kmoweryfrashefski@spokanecity.org](mailto:kmoweryfrashefski@spokanecity.org)>"

<[kmoweryfrashefski@spokanecity.org](mailto:kmoweryfrashefski@spokanecity.org)>

Date: 07/25/2022 3:59 PM

Subject: File Number Z21-280COMP, 440 & 516 W Cora Ave

To Whom it may Concern

These comments are in regard to the proposed rezoning of the area surrounding and including Faith Bible Church. We have several concerns with the now planned apartment complex(es) for this area. For starters we do not believe that the proposal included a large enough area to notify for comments, this big of a development will affect the entire neighborhood not just the few blocks surrounding it. Has any city council member or planning services member ever driven through this neighborhood with homes built from the late 1800's-early 1900's? Have any of you seen how narrow the streets are? Or how congested it is at night when people are home parking on both sides of the streets? Have any of you physically looked at the entrance off Division/Euclid to Cora, we can't even get our motorhome though there. How do you expect the new traffic the apt complex will bring with it will get though there? The only option will be driving though all the other neighborhood streets which will significantly increase traffic in entire neighborhood with its narrow one car width streets, thus effecting the entire Corbin Park Neighborhood. Just a couple of weeks ago we had a firetruck unable to make it to a medical call as the truck couldn't get through with cars parked on both sides of the street. They packed their equipment 1/2 block to the house where the call was, what if that had been a fire? This is a problem every year during snow removal, the plow trucks struggle to make it down our streets even with the park on one side plan the city has. People can't all park on one side, most of these homes don't have driveways as again they were built long ago. Will the infrastructure be updated to handle this as well? We're talking about sewer, water, electricity, gas, etc. Remember during the heat last year Avista did rolling blackouts in the older neighborhoods as the transformers weren't capable of handling the load on them. What will a construction project this big do to the already existing infrastructure? Will there be blasting or anything else that could

damage our aging sewer, water lines that will then cost the homeowners thousands of dollars to repair?

Now on to safety of the neighborhood. The two current apartment complexes off Post and Cora are constantly visited by law enforcement and several high-profile SWAT visits. The unfortunate truth is that an area saturated with rentals tends to lead towards disturbances. Do we have the funding/staffing for schools, police, social services, fire, etc to handle the additional population to that one area? Does it not seem like we are overwhelming one area with rentals? How many of these apartments will be section 8, same as both of the already existing apartment complexes. Many are not old enough or lived here long enough to remember when you didn't go to Corbin Park after dusk. From the 80's through the mid 90's this was not a safe neighborhood. What it took for this beautiful historical neighborhood to clean up was for the homes that been converted to duplexes/triplexes to be returned to their original single-family homes. For the single rental houses to be bought and cleaned up. Since the late '90s until now this has become a quiet working-class neighborhood. We would think that the two large apartment complexes already in this neighborhood should meet the quota. What happened to the originally planned Corbin Cottages that while not ideal was at least reasonable? It would not have overloaded the neighborhood and would have fit the area better.

Lastly comes the appearance of these planned apartment complexes. Exactly how does a large apartment complex make a historic neighborhood attractive? Our neighborhood has become as popular as it is because the homes are unique, one of a kind. No one's house looks like the one next door. The lure of the area is the quaintness of the neighborhood. It is a quiet, beautiful, oasis for working class families. Children riding bikes or playing basketball in the streets since we are all respectful of our neighbors and drive accordingly through our streets. What will these plans do to the value of not just our home but all the homes in the Corbin Park neighborhood? Working class families have a right to a quiet single-family neighborhood. There are much better suited areas for large apartment complexes with easier access to wide streets than an old neighborhood.

Thank you in advance for at least taking our thoughts into consideration

Alvan and Laura Behar  
3214 N Stevens St

## Freibott, Kevin

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**From:** Greg Cripe <gregc2113@yahoo.com>  
**Sent:** Wednesday, June 22, 2022 1:26 PM  
**To:** Planning & Development Services Comp Plan  
**Cc:** mary robinson  
**Subject:** project at 440 and 516 w cora avenue

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Hello,

I am writing to express my concern about the possibility of more high density housing in this neighborhood. While I don't have an issue with the parcels being used for housing units, I feel high density is not appropriate for this area.

\*The lots are not located on an arterial.

\*Cora already has a speeding problem as many use Cora to cut from Division to Post.

\*The road diet at Monroe has led to unsafe crossings/turning during rush hour commutes and high density here would increase backups and dangers.

\*Due to the lack of a restriction about turning left onto Division from Euclid also leads to backups/unsafe turns at many times during the day.

\*Due to the narrowing of Cora and the large number of vehicles parked on the street on Cora between Euclid and Alice causes a pinch point and blind spots. Combined with the high rate of travel of many of the reckless drivers who pass through the neighborhood, this also creates an unsafe environment which would be exacerbated by a high density project.

\*The other exit from this neighborhood involves driving 7 blocks south through a residential neighborhood and an additional half mile around a popular park. During the winter these roads are not well plowed making this an exceptionally poor option.

\*On Sundays the area near Post, which always has many cars from the apartments parked on the street, has additional strains on street parking due to the large number of congregants of the two churches as well as limited off road parking at the church near Post. The lane becomes congested. During the winter, due to poor plowing, cars are parked several feet off of the curb dramatically narrowing the passable area.

\*I chose to purchase a home in this area due to the quiet nature and walk/bike ability of the neighborhood. Changing the zoning and putting high density housing on this large of an area would greatly change the ambience of the surroundings, negatively impacting the quality of life and housing prices while increasing the likelihood of accidents, congestion, parking issues as well as an increase in noise and lighting pollution.

I feel it would be acceptable to change zoning to allow a small housing project but allowing high density in an established neighborhood with already poor road access and considerable issues with speeding and abandoned vehicles would have a negative impact on myself and my neighbors.

Thanks for your time,  
Greg Cripe  
428 W Alice Avenue

**From:** [Cindy Ecklund](#)  
**To:** [Planning & Development Services Comp Plan](#); [Mowery Frashefski, Kara](#)  
**Subject:** Zoning Change for north side of West Cora Ave.  
**Date:** Monday, July 25, 2022 2:22:22 PM

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

Planning Department for City of Spokane-

Attn: Kevin Freibott, Kara Frashefski and all other related departments

We own a home and rental property at 633 and 635 W. Glass, directly north and above the proposed zone change area on west Cora Ave. We **STRONGLY OPPOSE** this zone change request. This change would have a huge, negative impact on our property in too many ways to list.

But beyond our personal situation, it is ridiculous to approve 75'h buildings in this residential neighborhood. That is potentially SEVEN story buildings!! No where in our city are there buildings this tall in the middle of a residential neighborhood.

This zone change would:

1. destroy our beautiful panoramic views of the city(the #1 reason we're here)
2. increase the traffic, overwhelming the neighborhood streets and arterials near by
3. create school capacity issues for the neighborhood schools
4. cause dangerous walking routes for children attending these schools, requiring crossing several high traffic streets which will become even more heavily trafficked if this zone change is approved
5. create noise pollution for this quiet residential community
6. more than likely increase the crime rate in this area
7. environmentally overwhelm this area by overpopulating the neighborhood with high density housing

I am not opposed to development in general. Adding available housing in our city is important, and this property is ideal for a 'normal residential neighborhood' just like it is currently zoned for, Residential 4-10. Developing this property in a responsible way is key to not only maintaining this neighborhood's character, but also improving it. Re-zoning is NOT the responsible way to handle this property.

Thank you for considering our very strong concerns,

Cindy Ecklund

(509)435-3694

**From:** [Ecklund, Tim](#)  
**To:** [Planning & Development Services Comp Plan](#); [Mowery Frashfski, Kara](#)  
**Subject:** Zoning Change for north side of West Cora Ave.  
**Date:** Monday, July 25, 2022 3:57:37 PM

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

Planning Department for City of Spokane-

Attn: Kevin Freibott, Kara Frashfski

I have a rental house at 633 W Glass. The proposed zoning changes are directly in front of our view of the city and touching the edge of our property. Zoning such as this is much like other places in the world in 3rd world country cities. Rampant graft and corruption allow high rise towers in residential areas. Mexico City has multiple towers scattered throughout residential areas and adjacent to destitute poverty. Sole Korea, Vietnam, Mexico, and anywhere that there is corruption, zoning scramble is rampant. It begs the question, why is this even being considered? A 75-foot building in the middle of a single family residential zoned area is a monument to corruption. There is nowhere north of the river that has 75 foot towers slapped down in the middle of a residential neighborhood. Who is being paid off to allow this to happen?

The roads supporting this high-density housing are simply not there. So, traffic must route through narrow, low-traffic-intended residential streets. Blind corners, children in the streets, and low speed streets are a recipe for pedestrian deaths.

There are multiple precedents set where lawsuits are successfully won over stolen skyline view against developers and zoning commissions. You are opening the City of Spokane and yourself personally for legal action. Nowhere in this proposal is there compensation for neighbors that have their view stolen from them by this development.

You may say, just because it is zoned for 75 foot buildings does not mean they will build them that big. But, from the developer's viewpoint, it is more economical to build a tall building than multiple short ones. The cost of a sprinkler system for a taller building is far offset by the increased units in the building. This deepens the problem of utility issues and overpopulation. The only one that wins is the developer and whoever has allowed this to be zoned.

Lastly, all the other support infrastructure does not support a huge population dropped in the middle of a residential zone. Schools, Electrical power, Sewer and Water will all be undersized and require improvements made by the city with taxes of people in the neighborhood that do not want the high density development in the first place. There should be a tax revolt because of this. Nobody footing the bill for the improvements gets any benefit for the improvements. They only are inconvenienced. Property values are reduced, and rental prices dropped from the forced taxation required to support incorrectly zoned structures. Nobody wants a 75 foot tower in their back yard. All the constituents of the area will be incensed by this development.

Do not allow this high density development in the middle of a quiet, residential neighborhood.

Tim Ecklund

(509)435-3694

## Freibott, Kevin

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**From:** Mike Flahaven & Sandy G <gillflah@comcast.net>  
**Sent:** Friday, November 19, 2021 2:41 PM  
**To:** Freibott, Kevin  
**Subject:** Faith Bible Church Development on Cora Ave

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hi Kevin,

My name is Mike Flahaven and at North Hill's November meeting Liam Taylor with Storhaug Engineering shared information about a rezone and proposed development at Faith Bible Church on west Cora Ave. Liam said you could help us learn more about this development. My take-away from Liam's presentation includes:

- Re-zone is for high density that could allow 283 to 566 units on an 18.8 acre site. Church building site will remain as is.
- Cora Ave. is a residential street that borders the south side of the site and ties Post with Division. This street could be overwhelmed with the traffic from 566 units. This development will have impact on the residents south of Cora and the Emerson Garfield Neighborhood.
- There was mentioned of constructing buildings 70 feet tall (approximately 7 stories).
- The zone change includes the hill bluff. Liam questioned if the hill side would be developed but if I remember correctly the city approved developing the hillside on Courtland Ave west of Monroe. Will the hill be developed? I have concerns about the lack of soil stability on the hill side and the impact of the south view from Glass Ave.
- This site may have more impact on Emerson Garfield than North Hill. Cora is the border between our neighborhoods.

Can you share any addition information such as:

- Do my bullet points above match the city's understanding of this proposed development? What is allowed with the proposed zoning?
- Steps the developer must follow for approving their plan and the time line for the approval process.
- How can neighbors and neighborhoods provide input to this process?
- What happened to the 13 cottages units proposed last year just west of the church? Will they be developed as proposed or does this new plan superseded the previous plan?

I look forward to learning more about this development from you and how we can remain connected & involved. I appreciate your help.

Thanks, Mike Flahaven

**Freibott, Kevin**

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**To:** Mike Flahaven & Sandy G  
**Cc:** Mowery Frashfski, Kara  
**Subject:** RE: Faith Bible Church Development on Cora Ave

Hello, Mike. We're in the very, very early stages of this process so I'm afraid I don't know everything yet, but where possible I answered your questions below **in red**. Please note that Comprehensive Plan Amendments take 12 to 14 months to process, so we have plenty of time to work things out. Nothing much will happen before the new year, when a docketing committee will be convened to determine which of the five applications we received this year will go forward for full processing and which will not. Those selected for full processing will be subject to a lengthy public comment period (next summer) during which we will reach out to both neighborhoods (Emerson/Garfield and North Hill) and the public in general, asking for comment and input.

Until then, we have some administrative record work to do. Rest assured, copious amounts of information will be shared with the public and with you in the new year, and you will have multiple opportunities to provide your input on this proposal.

I've added you to our "interested persons" list for this application (ref: **File Z21-280COMP**), so you will receive any announcements or notices from our department regarding this proposal.



**Kevin Freibott** | Planner II | City of Spokane - Planning and Development Services

509.625-6184 | <mailto:kfreibott@spokanecity.org> | [spokanecity.org](http://spokanecity.org) | [spokaneplanning.org](http://spokaneplanning.org)




---

**From:** Mike Flahaven & Sandy G <gillflah@comcast.net>

**Sent:** Friday, November 19, 2021 2:41 PM

**To:** Freibott, Kevin <kfreibott@spokanecity.org>

**Subject:** Faith Bible Church Development on Cora Ave

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Hi Kevin,

My name is Mike Flahaven and at North Hill's November meeting Liam Taylor with Storhaug Engineering shared information about a rezone and proposed development at Faith Bible Church on west Cora Ave. Liam said you could help us learn more about this development. My take-away from Liam's presentation includes:

- Re-zone is for high density that could allow 283 to 566 units on an 18.8 acre site. **We haven't calculated this yet but the proposal is for 15-30 dwellings per acre and the site is about 19 acres. Those numbers only seem likely if they were to raze the church and build very high density apartments. Church building site will remain as is. That is my understanding as well, but since this is just a comprehensive plan amendment, not a development proposal, I cannot guarantee it.**

- Cora Ave. is a residential street that borders the south side of the site and ties Post with Division. This street could be overwhelmed with the traffic from 566 units. This development will have impact on the residents south of Cora and the Emerson Garfield Neighborhood. The City will ask the Streets and Capital Management departments to weigh in on whether they expect traffic impacts or not, if and when the proposal is added to the docket for full processing.
- There was mentioned of constructing buildings 70 feet tall (approximately 7 stories). The application asked for a new zoning of RMF-55, which would have a 55-foot maximum.
- The zone change includes the hill bluff. Liam questioned if the hill side would be developed but if I remember correctly the city approved developing the hillside on Courtland Ave west of Monroe. Will the hill be developed? I have concerns about the lack of soil stability on the hill side and the impact of the south view from Glass Ave. Again, as this is not a development proposal, just a comp plan amendment, no actual development would be approved if this proposal goes through. Any future development would have to comply with the Municipal Code as to soil stability, engineering, etc. and would require application for a building permit, etc.
- This site may have more impact on Emerson Garfield than North Hill. Cora is the border between our neighborhoods. That is precisely why the applicant must offer to present information to both neighborhoods and why any future notices/announcements will go to both as well.

Can you share any addition information such as:

- Do my bullet points above match the city's understanding of this proposed development? See answers above. What is allowed with the proposed zoning? If you want to see the particulars of what can be done in an RMF zone, see [SMC 17C.110](#).
- Steps the developer must follow for approving their plan and the time line for the approval process. This is the first step, getting the comp plan amendment and rezone. If that is approved, they could seek building permits immediately, which is an entirely separate process that can take weeks. They have not shared a timeline for any construction and they can wait as long as they like after the comp plan amendment is complete to begin it.
- How can neighbors and neighborhoods provide input to this process? There are multiple opportunities during the next 14 months to provide input and comment. I have added you to the "interested persons" list so you will receive emails whenever a notice is issued and you have the opportunity to participate.
- What happened to the 13 cottages units proposed last year just west of the church? Will they be developed as proposed or does this new plan superseded the previous plan? I don't have any direct information on this. If it was on the church property, then this new proposal would allow them to build multi-family units instead of single-family. I'm not aware of any other development proposals on this property at this time, but I can ask.

I look forward to learning more about this development from you and how we can remain connected & involved. I appreciate your help.

Thanks, Mike Flahaven

From: [Hilary Garber](#)  
To: [Freibott, Kevin](#)  
Cc: [Downey, KayCee](#); [Freibott, Kevin](#); [Black, Tirrell](#)  
Subject: #Z21-280COMP, 440 & 516 W Cora Ave.  
Date: Wednesday, June 8, 2022 3:28:07 PM

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[CAUTION - EXTERNAL EMAIL - Verify Sender]

**\*\*Note:** The email address listed in the official notification letter does not work. My original email to Kara is below.

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Planning Services Department  
ATTN: Kara Frashefski, Assistant Planner  
808 W. Spokane Falls Blvd.  
Spokane, WA 99201

RE: File #Z21-280COMP, 440 & 516 W Cora Ave.

Dear City Planners,

I recently received a written notification of a proposed zoning change at 440 & 516 W Cora Ave.

This parcel of land is located in a nice residential area, surrounded by one, two, and a few three story homes.

Whereas I am not opposed to allowing a zoning change to RSF or RMF, **I do not agree with allowing a zoning change to RMF-75!** A building, up to 75 feet tall, is just too tall for this area and will be out of place.

I urge you to consider the residents and homeowners of the area, and to keep any zoning changes in alignment with the neighboring homes – one, two or 3 stories tall.

Sincerely,

Hilary Garber, Homeowner

Ph. 509-994-2022

Email: [Hilary123456@yahoo.com](mailto:Hilary123456@yahoo.com)

June 8, 2022

Hilary Garber  
504 W Glass Ave.  
Spokane, WA 99205

Planning Services Department  
ATTN: Kara Frashefski, Assistant Planner  
808 W. Spokane Falls Blvd.  
Spokane, WA 99201

RE: File #Z21-280COMP, 440 & 516 W Cora Ave.

Dear City Planners,

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I urge you to consider the residents and homeowners of the area, and to keep any zoning changes in alignment with the neighboring homes – one, two or 3 stories tall.

Sincerely,



Hilary Garber  
Homeowner

Ph. 509-994-2022  
Email: Hilary123456@yahoo.com

June 9, 2022

Loren Garber  
504 W Glass Ave.  
Spokane, WA 99205

Planning Services Department  
ATTN: Kevin Freibott, Assistant Planner  
808 W. Spokane Falls Blvd.  
Spokane, WA 99201

RE: File #Z21-280COMP, 440 & 516 W Cora Ave.

Dear City Planners,

I recently received a written notification of a proposed zoning change at 440 & 516 W Cora Ave.

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I urge you to consider the residents and homeowners of the area, and to keep any zoning changes in alignment with the neighboring homes – one, two or 3 stories tall.

Sincerely,



Loren Garber  
Concerned Homeowner

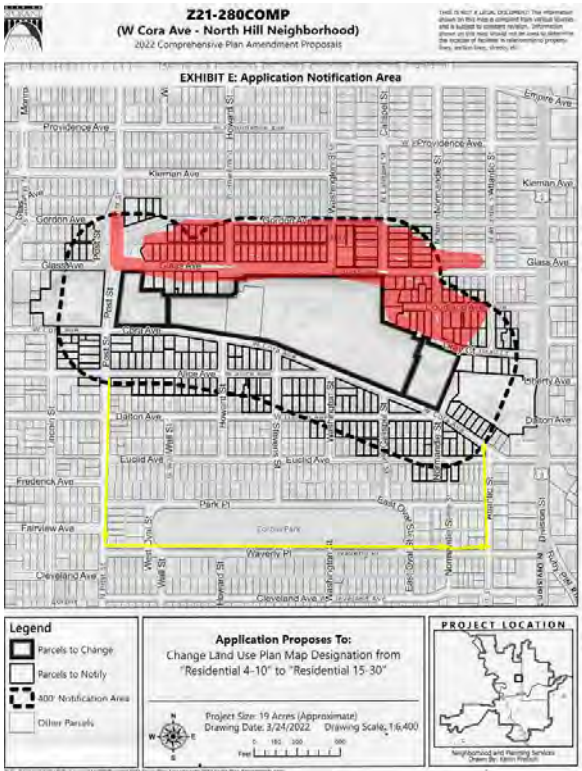
Ph. 509-981-3558  
Email: loren\_garber@yahoo.com

From: [Black, Tirrell](#)  
To: [Freiboth, Kevin](#) [Downey, KayCee](#)  
Subject: FW: Question on file z21-280comp 440 516 W. Cora avenue.  
Date: Thursday, June 2, 2022 10:50:37 AM  
Attachments: [Screenshot\\_178.png](#)  
[Screenshot\\_180.png](#)

From: roger habets <must86@live.com>  
Sent: Friday, May 27, 2022 2:34 PM  
To: Black, Tirrell <tblack@spokaneccity.org>  
Subject: Question on file z21-280comp 440 516 W. Cora avenue.

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Question why does the city send notices to people that will see zero affect from any building on a property and then not give others a say that will, this property sits against a hill, all properties north will not see any foot traffic or traffic of any kind, everything will be pushed south, but yet the people that live south say, Corbin Park don't get a notice, this makes no sense to me, please explain.



See what I mean ?

Sent from Outlook The people in red, not affected, no access, the yellow line the people that will have their lives affected. Why send notices to people that don't care and will see no change either way ?

**Freibott, Kevin**

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**From:** roger habets <must86@live.com>  
**Sent:** Thursday, June 2, 2022 12:14 PM  
**To:** Freibott, Kevin  
**Subject:** Re: Question on file z21-280comp 440 516 W. Cora avenue.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Thanks for responding back to me, and since I am not an attorney and everything is decided by municipal law, and no concerns by citizens matter just the law, what options do I have to oppose this change in zoning which could bring up to but not limited to three hundred more people and cars in my neighborhood. It seems like, no matter what I say, I get , municipal law, so if nothing a person living across the street from this property matters, then what are my options? I say, roads, cars, noise pollution, not the flavor or feel of the neighborhood, don't pay full taxes, nothing seems to matter, so my question is what does matter and if citizen input doesn't matter why notify neighbors at all ? Now I am not being mean or disrespectful, I am just asking what can I do that the planning commission will care or that will actually have an impact?

Roger Habets

P.S. There are two new homes at the end of my block, there is a new duplex a block away, I had no problem with this growth, it fits in, and being against lowering my property value by building apartments across the street doesn't equal, you don't want affordable housing.

Sent from [Outlook](#)

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**From:** Freibott, Kevin <kfreibott@spokanecity.org>  
**Sent:** Thursday, June 2, 2022 10:58 AM  
**To:** must86@live.com <must86@live.com>  
**Cc:** Downey, KayCee <kdowney@spokanecity.org>  
**Subject:** RE: Question on file z21-280comp 440 516 W. Cora avenue.

Good morning, Mr. Habets. I've taken over processing this application for Kara Frashefski, as she's no longer working for the City. You raise a good question. Unfortunately, the Municipal Code is very clear as to how we're to send letters and it says everyone within 400' of any part of the proposal gets one. Those outside the 400' boundary won't receive a letter directly. However, because there are often mitigating situations, we also require that applicants put up signs (you should see several on this site). Additionally, the applications are posted on the [City's website](#), we notify the Neighborhood Council, and notices go in the Spokesman Review classified section, where these kinds of public notices are usually posted by the County and Cities. Notices are also posted in the nearest library to these proposals and at City Hall.

If it would help you stay informed on this proposal, I would be happy to add your email address to our distribution list for this application (File Z21-280COMP). That way every time we sent out a notice in the future you will receive it directly to your email. Would you like me to arrange that?

Thanks again for the good question and have a great day!

Kevin



**Kevin Freibott** | Associate Planner | City of Spokane - Planning and Development Services

509.625-6184 | <mailto:kfreibott@spokanecity.org> | [spokanecity.org](http://spokanecity.org) | [spokaneplanning.org](http://spokaneplanning.org)



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**From:** Black, Tirrell <[tblack@spokanecity.org](mailto:tblack@spokanecity.org)>

**Sent:** Thursday, June 2, 2022 10:50 AM

**To:** Freibott, Kevin <[kfreibott@spokanecity.org](mailto:kfreibott@spokanecity.org)>; Downey, KayCee <[kdowney@spokanecity.org](mailto:kdowney@spokanecity.org)>

**Subject:** FW: Question on file z21-280comp 440 516 W. Cora avenue.

Tirrell Black

Principal Planner

Planning & Economic Development, City of Spokane

509-625-6185

[tblack@spokanecity.org](mailto:tblack@spokanecity.org)

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**From:** roger habets <[must86@live.com](mailto:must86@live.com)>

**Sent:** Friday, May 27, 2022 2:34 PM

**To:** Black, Tirrell <[tblack@spokanecity.org](mailto:tblack@spokanecity.org)>

**Subject:** Question on file z21-280comp 440 516 W. Cora avenue.

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

Question why does the city send notices to people that will see zero affect from any building on a property and then not give others a say that will, this property sits against a hill, all properties north will not see any foot traffic or traffic of any kind, everything will be pushed south, but yet the people that live south say, Corbin Park don't get a notice, this makes no sense to me, please

explain.

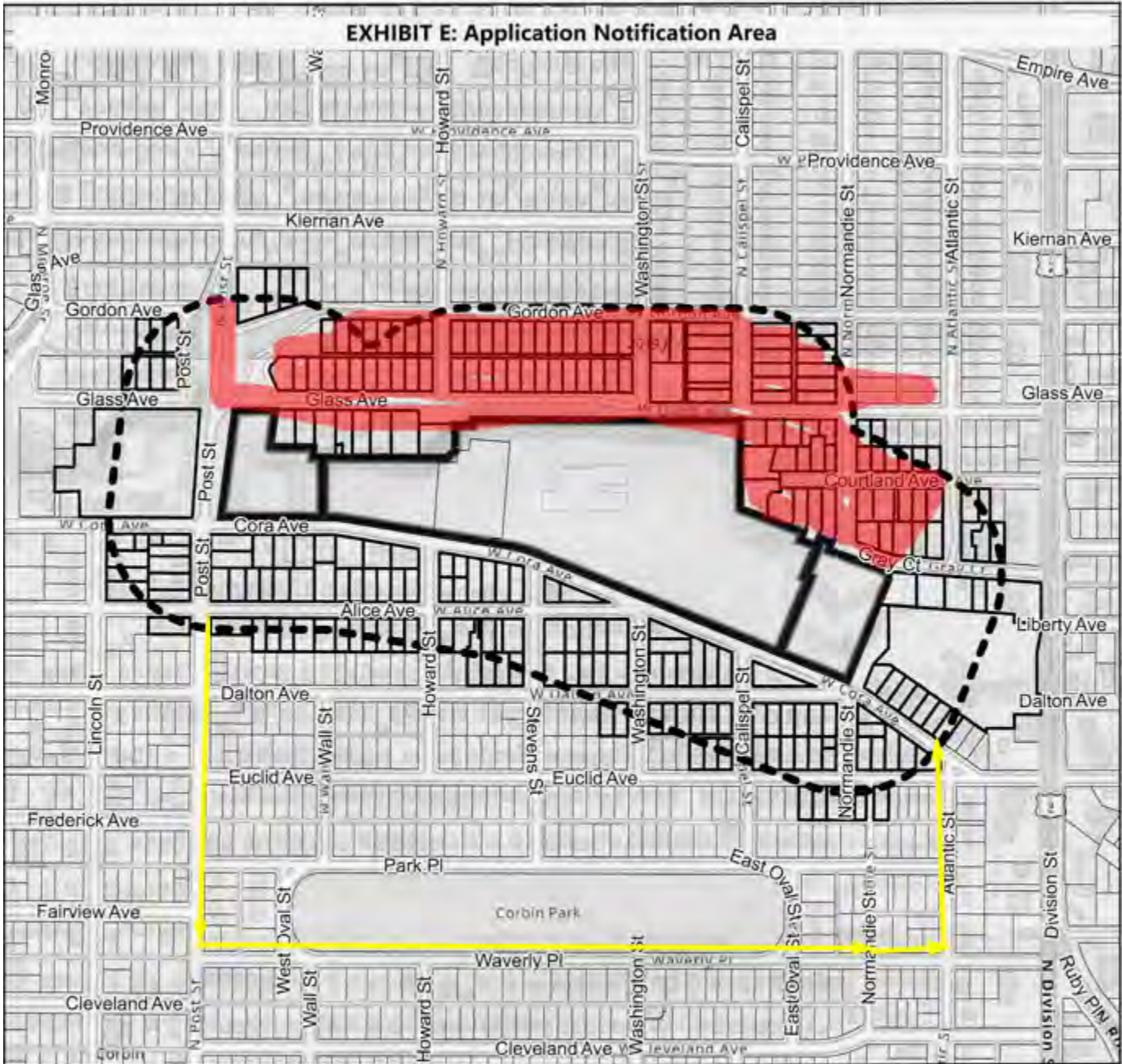


See what I mean



**Z21-280COMP**  
**(W Cora Ave - North Hill Neighborhood)**  
2022 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.



**Legend**

- Parcels to Change
- 400' Notification Area
- Other Parcels

**Application Proposes To:**  
Change Land Use Plan Map Designation from  
"Residential 4-10" to "Residential 15-30"

Project Size: 19 Acres (Approximate)  
Drawing Date: 3/24/2022    Drawing Scale: 1:6,400

**PROJECT LOCATION**

Neighborhood and Planning Services  
Drawn By: Kevin Freibott

Sent from [Outlook](#) The people in red, not affected, no access, the yellow line the people that will have their lives affected. Why send notices to people that don't care and will see no change either way ?

**Freibott, Kevin**

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**From:** roger habets <must86@live.com>  
**Sent:** Thursday, June 2, 2022 12:40 PM  
**To:** Freibott, Kevin  
**Subject:** Re: Question on file z21-280comp 440 516 W. Cora avenue.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

I have lived in my house for twenty one years, do you folks at the planning commission, get in your car and drive to the area which you are deciding or just look at a flat map, because if I say, I don't want to live across the street from apartments, you come back and say, but you have apartments less than four hundred feet from this property, well ok, but they are not a part of this neighborhood, they sit on a hill overlooking this neighborhood, no access by car or road, or any foot traffic. there is one gravel dirt access road that is usually blocked off by the city with big cement blocks, but I would have to take a left on division cross five lanes of traffic and then take another left to get to those apartments. Then the apartments on post, we see zero or very little traffic, they all go out post for the most part. So if I get copies and give them to the people in the Corbin park Neighborhood, get a petition to stop this zoning change, or just make my own opinion known, am I just wasting my time? You might as well just get rid of Corbin Park and sell it to a developer and put up apartment buildings. Now I am trying very hard to be respectful and nice to you personally and nothing is against you at all, so please don't take it that way, you aren't the King or queen of Spokane and you don't make all the rules. But you are my only contact with the planning commission. So should I toss the notice in the garbage and not waste my time, or should I rally the neighborhood to stop this change in zoning, can I make a difference, what will it take. Hire an attorney ?

Thanks Roger Habets

Sent from [Outlook](#)

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**From:** roger habets <must86@live.com>  
**Sent:** Thursday, June 2, 2022 12:13 PM  
**To:** Freibott, Kevin <kfreibott@spokanecity.org>  
**Subject:** Re: Question on file z21-280comp 440 516 W. Cora avenue.

Thanks for responding back to me, and since I am not an attorney and everything is decided by municipal law, and no concerns by citizens matter just the law, what options do I have to oppose this change in zoning which could bring up to but not limited to three hundred more people and cars in my neighborhood. It seems like, no matter what I say, I get , municipal law, so if nothing a person living across the street from this property matters, then what are my options? I say, roads, cars, noise pollution, not the flavor or feel of the neighborhood, don't pay full taxes, nothing seems to matter, so my question is what does matter and if citizen input doesn't matter why notify neighbors at all ? Now I am not being mean or disrespectful, I am just asking what can I do that the planning commission will care or that will actually have an impact?

Roger Habets

P.S. There are two new homes at the end of my block, there is a new duplex a block away, I had no problem with this growth, it fits in, and being against lowering my property value by building apartments across the street doesn't equal, you don't want affordable housing.

Sent from [Outlook](#)

**From:** Freibott, Kevin <kfreibott@spokanecity.org>  
**Sent:** Thursday, June 2, 2022 10:58 AM  
**To:** must86@live.com <must86@live.com>  
**Cc:** Downey, KayCee <kdowney@spokanecity.org>  
**Subject:** RE: Question on file z21-280comp 440 516 W. Cora avenue.

Good morning, Mr. Habets. I've taken over processing this application for Kara Frashetski, as she's no longer working for the City. You raise a good question. Unfortunately, the Municipal Code is very clear as to how we're to send letters and it says everyone within 400' of any part of the proposal gets one. Those outside the 400' boundary won't receive a letter directly. However, because there are often mitigating situations, we also require that applicants put up signs (you should see several on this site). Additionally, the applications are posted on the [City's website](#), we notify the Neighborhood Council, and notices go in the Spokesman Review classified section, where these kinds of public notices are usually posted by the County and Cities. Notices are also posted in the nearest library to these proposals and at City Hall.

If it would help you stay informed on this proposal, I would be happy to add your email address to our distribution list for this application (File Z21-280COMP). That way every time we sent out a notice in the future you will receive it directly to your email. Would you like me to arrange that?

Thanks again for the good question and have a great day!

Kevin



**Kevin Freibott** | Associate Planner | City of Spokane - Planning and Development Services

509.625-6184 | <mailto:kfreibott@spokanecity.org> | [spokanecity.org](http://spokanecity.org) | [spokaneplanning.org](http://spokaneplanning.org)



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**Sent:** Thursday, June 2, 2022 10:50 AM  
**To:** Freibott, Kevin <kfreibott@spokanecity.org>; Downey, KayCee <kdowney@spokanecity.org>  
**Subject:** FW: Question on file z21-280comp 440 516 W. Cora avenue.

Tirrell Black  
 Principal Planner  
 Planning & Economic Development, City of Spokane  
 509-625-6185  
[tblack@spokanecity.org](mailto:tblack@spokanecity.org)

**From:** roger habets <[must86@live.com](mailto:must86@live.com)>  
**Sent:** Friday, May 27, 2022 2:34 PM  
**To:** Black, Tirrell <[tblack@spokanecity.org](mailto:tblack@spokanecity.org)>  
**Subject:** Question on file z21-280comp 440 516 W. Cora avenue.

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Question why does the city send notices to people that will see zero affect from any building on a property and then not give others a say that will, this property sits against a hill, all properties north will not see any foot traffic or traffic of any kind, everything will be pushed south, but yet the people that live south say, Corbin Park don't get a notice, this makes no sense to me, please explain.

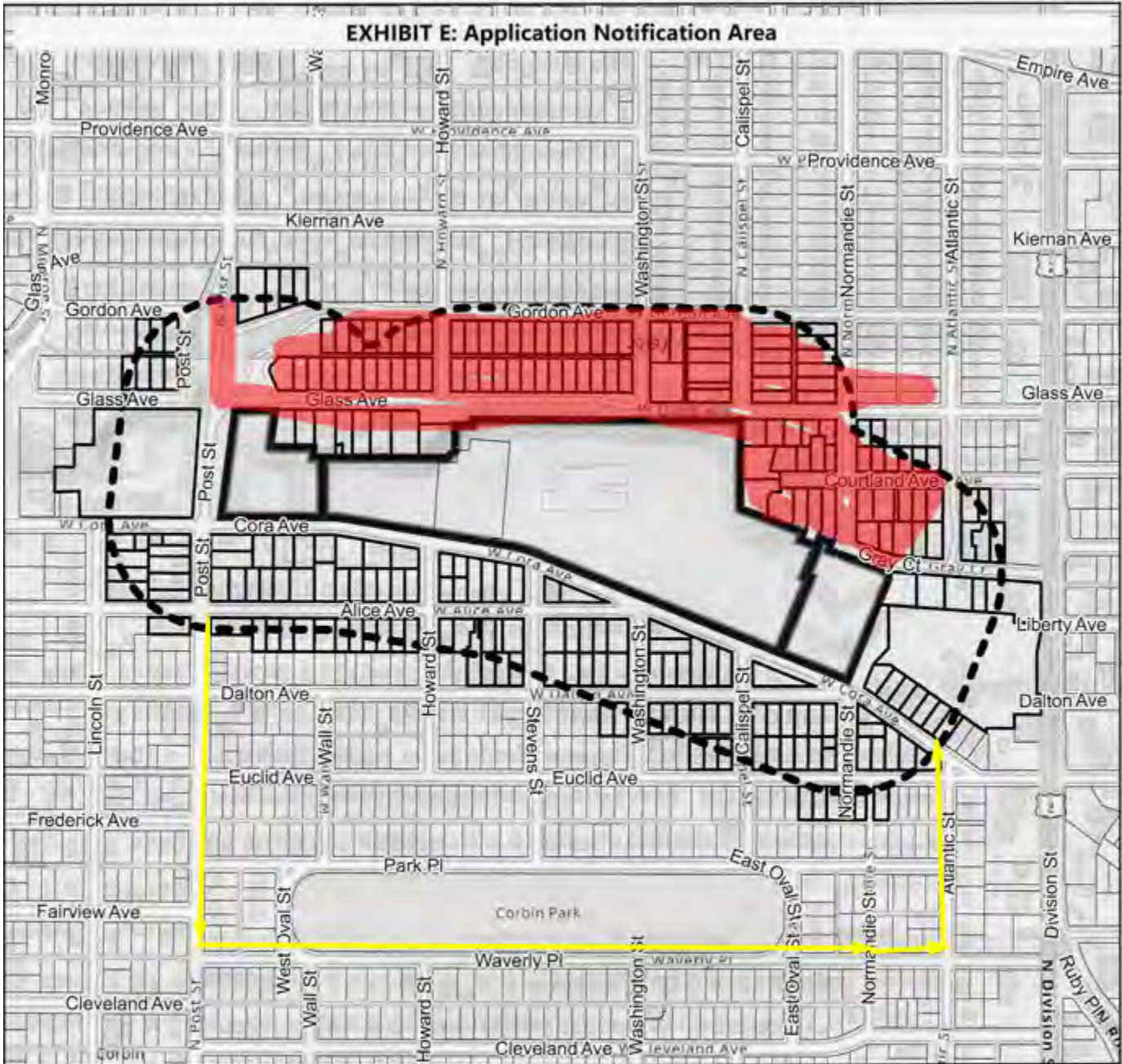


See what I mean



**Z21-280COMP**  
**(W Cora Ave - North Hill Neighborhood)**  
2022 Comprehensive Plan Amendment Proposals

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Neighborhood and Planning Services  
Drawn By: Kevin Freibott

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**From:** [Freibott, Kevin](#)  
**To:** [must86@live.com](#)  
**Cc:** [Downey, KayCee](#)  
**Subject:** RE: Question on file z21-280comp 440 516 W. Cora avenue.  
**Date:** Thursday, June 2, 2022 10:58:49 AM  
**Attachments:** [image007.png](#)  
[image004.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Tirrell Black  
Principal Planner  
Planning & Economic Development, City of Spokane  
509-625-6185  
[tblack@spokanecity.org](mailto:tblack@spokanecity.org)

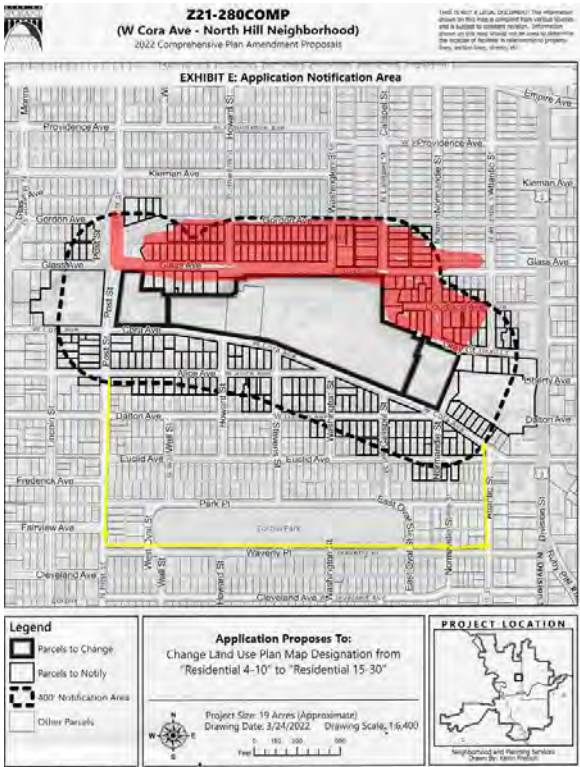
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**Sent:** Friday, May 27, 2022 2:34 PM  
**To:** Black, Tirrell <[tblack@spokanecity.org](mailto:tblack@spokanecity.org)>  
**Subject:** Question on file z21-280comp 440 516 W. Cora avenue.

[CAUTION - EXTERNAL EMAIL - Verify Sender]

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See what I mean ?

Sent from [Outlook](#) The people in red, not affected, no access, the yellow line the people that will have their lives affected. Why send notices to people that don't care and will see no change either way ?

Jacqueline Harvey  
227 West Glass Avenue  
Spokane, WA 99205  
509-309-6297

July 21, 2022

Planning Services Department  
Attn: Kara Frashetski, Assistant Planner  
808 West Spokane Falls Boulevard  
Spokane, WA 99201-3333

**RE: NOTICE OF APPLICATION AND SEPA REVIEW, REQUEST FOR PUBLIC COMMENTS  
FILE NO. Z21-280COMP, 440 & 516 W. CORA AVE.  
COMPREHENSIVE PLAN LAND USE MAP AMENDMENT PROPOSAL**

To Whom it May Concern:

I am writing to express my concerns regarding the request to amend zoning the parcels of interest in FILE NO. Z21-280COMP located at 440 & 516 W. Cora Ave. from "Residential Single Family (RSF)" to "Residential Multifamily, 75-foot height limit (RMF-75)". While I have no concerns with rezoning from "RSF" to "Residential Multifamily (RMF)", I am however deeply concerned with the proposed building height allowance of up to 75-feet tall. This height allowance is too tall and will be at, or above, the height of the open bluff on West Glass Avenue thereby degrading and/or completely eliminating the expansive, open view of the city and beyond that currently exists along the West Glass Avenue bluff. Allowing a 75-foot building height will have multiple negative impacts including:

- Substantial devaluation in the worth of my view property at 227 West Glass Avenue by impacting/eliminating the existing view from my property
- Substantial devaluation in the worth of all other view properties along the bluff on West Glass Avenue by impacting/eliminating the existing views
- Loss of scenic value for the many walkers/bikers/joggers who currently enjoy the view off the bluff on West Glass Avenue on a daily basis, year-round
- Loss of contemplative value for visitors to the bluff who enjoy sitting on the existing benches and taking in the view
- Loss of a long tradition of fireworks viewing on holidays when large crowds gather along the West Glass Avenue bluff to celebrate and watch the downtown fireworks display

I urge the City of Spokane to ensure that these many negative impacts will be avoided by only allowing a construction height that remains below the level of the bluff. This height restriction should also include any objects or structures such as vents, fans, antennae, etc. that may be placed upon the rooftops of the new buildings so that all such objects, and the rooflines, remain below the level of the bluff thereby ensuring the view remains unobstructed and unspoiled.

Properties and public spaces with views of the city and beyond are extremely rare within Spokane's city limits. This unique scenic value needs to be preserved for the public, and to ensure that no significant financial harm impacts the West Glass Avenue property owners.

Sincerely,



(Jacqueline Harvey)

**From:** [RALPH H LANDIS](#)  
**To:** [Planning & Development Services Comp Plan](#)  
**Subject:** Proposed Development on property below Glass Avenue bluff  
**Date:** Thursday, July 21, 2022 12:59:44 PM

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**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

ATTN: Kevin Freibolt

I am writing concerning the proposed redevelopment of the property below the area where I currently live (709 W. Glass Avenue). I neglected to note the project numbers so I apologize for not being more specific on identifying the project but I feel confident you will know to which proposal I am referencing.

My primary concern is the part that indicated the city had approved a structure (or structures) that could be as high as 75 feet. I have concerns that a structure that tall could put the upper floor(s) at eye level with the back yards of those who own homes along the bluff. Structures that tall could also hurt the property values for the tax paying City of Spokane citizens who live there. While I am *not* one of those homeowners (I rent half of a duplex that is situated on the bluff), this proposal can affect me as well if my landlords decide to sell their home because of it.

I don't know if any of these concerns will be effective in persuading the City of Spokane to abandon the idea of allowing constructions of buildings that would exceed only a few stories high. But there has to be a better idea that can provide more areas of housing without negatively affecting those residents who have been paying, what I am sure have been, substantial property taxes for many, many years.

Please weigh the effects of this development proposal on existing tax paying citizens of the City of Spokane with the need to create more available housing and settle on a more equitable and reasonable plan.

Thank you for your time.

Hank Landis  
709 W. Glass Avenue  
Spokane, WA

## Freibott, Kevin

---

**From:** Lauren Richey <thericheyfarm@gmail.com>  
**Sent:** Saturday, June 18, 2022 7:35 AM  
**To:** Freibott, Kevin  
**Subject:** Application Number: Z21-280COMP

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Mr. Freibott Or whom it may concern,

I am a resident in the Garfield-Emerson neighborhood, near where the potential zoning change will be along Cora Avenue. The zoning changing to multi-family apartments is understandable and a good idea considering the housing shortage in spokane, however to allow this developer to build as tall as 75 ft is unacceptable and too many new units would be detrimental to the health of this neighborhood. That is much too tall for the area and will change the skyline, and block the view of residents higher on the hill. Also, a small residential neighborhood having an influx of six stories worth of new people/families means that traffic in the area will increase dramatically, not to mention: parking. Emerson-Garfield is a neighborhood with working-class families. We need places for kids to be safe and be able to walk around without worrying they can't make it safely due to traffic. Washington street is already very dangerous for pedestrians, and that will only get worse if there is a huge increase in people in the area due to big housing developments.

I ask that the city limit the total number of units to be built, require the developers plan & build-in ample parking for new residents, so they don't have to rely on street parking, and limit the height of the buildings to something more on scale for this small neighborhood, an absolute maximum of four stories & 55 ft tall. I appreciate your time and attention.

-Lauren Richey  
507 W Montgomery Ave  
Spokane, WA 99205  
425.306.0831

## Freibott, Kevin

---

**From:** Mary Robinson <gustof7@yahoo.com>  
**Sent:** Wednesday, June 22, 2022 2:46 PM  
**To:** Freibott, Kevin  
**Subject:** Corbin Park neighborhood new construction. File #Z21-280COMP

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello,

I am a resident of the Corbin Park neighborhood. My husband and I have lived in our home at 426 W Alice Ave for 17 years, and have some serious concerns about the proposed development on Cora adjacent to the Faith Bible church. Our property is a flag lot which lies between Alice and Cora, directly across from the church.

We have long expected to see some kind of housing development on the vacant land, and were somewhat encouraged by the initial "Corbin Cottages" that had been proposed. However construction of high density apartment complexes in a spot that does not have safe nor efficient access to arterials is a disaster waiting to happen.

I had hoped perhaps a forward-thinking developer would take a holistic, sustainable approach to the project, respecting the historic nature of the neighborhood as well as the unique natural habitat of the bluff, which is home to a myriad of wildlife and birds, and a pathway for deer.

Four new homes have been built on small lots within a block of us, which are occupied by families with children. We are thrilled with our new neighbors, and happy to see kids on bikes. But the addition of high density housing on Cora and the traffic that it will create is dangerously putting the cart before the horse.

Serious consideration needs to be given to traffic-slowing infrastructure to insure safety to residents.

Spokane needs affordable housing, and I support infill in areas of town where it is appropriate. But please consider the impact on a neighborhood that is finally revitalizing after many years of neglect, and support a lower density development.

Thank you for your consideration.

Mary Robinson  
426 W Alice Ave  
Spokane 99205

## Freibott, Kevin

---

**From:** Jeffrey Thomas <jeffreythomas5500@gmail.com>  
**Sent:** Tuesday, June 21, 2022 7:57 PM  
**To:** Freibott, Kevin  
**Subject:** Proposed rezoning of property on north side of Cora Ave

**[CAUTION - EXTERNAL EMAIL - Verify Sender]**

To whom it may concern:

As a resident of this neighborhood, my wife and I are VEHEMENTLY OPPOSED to this rezoning because if apartments are built on this property there will be greatly increased traffic on Cora Ave and Euclid Ave. The intersection of Euclid and Division is already a dangerous intersection and the hill leading up to Division from Cora Ave is very dangerous in the winter.

For public safety reasons, this rezoning should be REJECTED.

Sincerely,  
Jeff Thomas - 103 W Euclid Ave.

## Freibott, Kevin

---

**From:** sandy\_wilson57 <sandy\_wilson57@comcast.net>  
**Sent:** Friday, June 10, 2022 12:36 PM  
**To:** Freibott, Kevin  
**Subject:** Zoning Change

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello!

I live in Garland district and I oppose the zoning change request to allow a 75 foot building to be built. Request is from Faith Bible church.

Thank you

Sandy Wilson

Powered by Cricket Wireless

## Exhibit O

Applicant Letter for Plan Commission



August 5, 2022

Plan Commission  
City of Spokane  
808 W Spokane Falls Blvd  
Spokane, WA 99201

RE: Z21-280COMP  
Faith Bible Church, Comprehensive Plan Amendment  
Storhaug Engineering Project #19-087

Members of the Plan Commission:

Thank you for the opportunity to discuss the above-mentioned Comprehensive Plan Amendment at the Plan Commission meeting on June 8, 2022. It was a great chance for Jim Greenup and I to get to know you all, as well as provide information regarding our application. We understand that the Plan Commission has shown some interest to suggest the Residential 15+ Land Use (RHD zone) for this proposed amendment, instead of the Residential 15-30 Land Use (RMF zone), which was originally proposed.

It is the intent of this narrative to inform the Commission that we would have *no objection* if the Residential 15+ Land Use was suggested to City Council, so long as the 75-foot height limit requested in our original application is respected. This application was originally submitted with the aim to give future developers the best possible opportunity for development, and the higher density land use would provide them with the potential to construct more housing than previously proposed.

We believe that this site is apt for high density residential development because of its close proximity to downtown Spokane, transit options, as well as the Monroe, Garland, and Division corridors. It is also one of the largest privately owned open spaces in the city, making it a unique section of land with great potential that could also greatly benefit from the Multi-Family Tax Exemption zone, if it were extended to this land. If you have any questions or comments, please do not hesitate to contact me at [liam.taylor@storhaug.com](mailto:liam.taylor@storhaug.com) or at the number below. We are very much looking forward to hearing your decision, as well as meeting with City Council for further discussion.

Sincerely,

Liam J. Taylor

A handwritten signature in black ink that reads "Liam J. Taylor".