

March 17, 2025

City of Spokane Development Services Center
Attn: Melissa Owen, Assistant Planner
808 W. Spokane Falls Boulevard
Spokane, WA 99201-3329

Via email to mowen@spokanecity.org

Dear Sirs,

We would like to express our strong opposition to the high-density residential development proposed for 1111 E. 27th Avenue (Parcel Numbers 35294.2112, 35294.2113, and 35294.2114), as follows:

Neighborhood Character and Stability¹

This is an old, well-developed, and well-maintained neighborhood, composed exclusively of single-family homes with off-street parking. Although the original plat created 50' lots, all homes were built across property lines so that they occupy more than one original lot (see Scout map). This has resulted in an attractive, green, and 'in demand' neighborhood where residents enjoy privacy and take considerable pride in ownership. Families pay \$600,000 to \$1.5 million or more to buy homes in this neighborhood because of its '*character*' and '*stability*.'

Proposed Development: Original Concept

Originally, we understood that Urban Empire Homes, LLC ("developer") bought this property for the purpose of building 3 new single-family homes. To accomplish this, we understood that it would demolish the existing home and use a boundary line adjustment to reinstate three 50' MOL lots. We did not oppose this nor are we aware of any neighbors who opposed this. Although it increased neighborhood density, it seemed reasonable.

Proposed Development: Current Concept

Now, we understand that the developer has changed its plans and wants to build a significantly higher-density development. We understand that it wants to:

- Use boundary line adjustments to create 4 40' lots.
- Build 2 single-family homes on 2 of those 40' lots.
- Sub-divide the remaining 2 40' lots into 4 20' lots.

¹ Bounded by Perry and Arthur Streets on the east and west, and Plateau Road and 29th Avenue on the north and south.

- Build duplex units on each of those 20' lots.
- Make no provision for off-street parking.

Obviously, the change from reasonable density (3 units) to high-density (10 units) is designed to maximize the profit potential of the developer but it does so at the expense of the property owners who have invested in this neighborhood based on its character and stability. It is not possible to 'shoehorn' that many homes onto the property and have them blend into the neighborhood in any reasonable way, shape, or form. The proposed development will substantially and irrevocably change the character of the neighborhood and destabilize it. Specifically, if one developer is permitted to do this, others will follow and the neighborhood will become a patchwork of poorly planned development, as has happened in Seattle, Portland, and other cities. Notably, those cities recognize the damage done to their neighborhoods by such 'infill' projects and they have backed off.

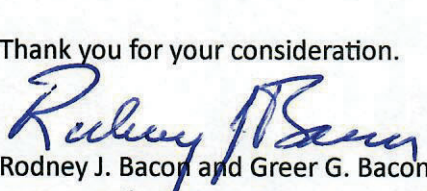
Conclusion

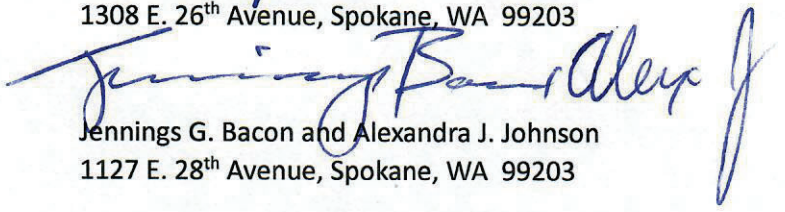
The City of Spokane has a duty to serve the best interests of neighborhood property owners, not just developers who will never have to live with the consequences. Here is one example of how the proposed development will impact this neighborhood. If 10 units are built with no provision for off-street parking and there are 2 cars per unit, there will be 20 cars parked on the street where none park now. This will adversely impact curb appeal. This will adversely impact the ability of neighbors to drive into and out of their own driveways. This will adversely impact parking for guests, as well as delivery and service vehicles. This will adversely impact City services, like garbage collection and snow removal. As before, this is example but there are others, as well.

THE CITY SHOULD RECOGNIZE THAT BUYING A HOUSE IS THE BIGGEST INVESTMENT THAT MOST FAMILIES WILL EVER MAKE. PROSPECTIVE OWNERS CANNOT BUY HOMES WITH CONFIDENCE IF THE CITY CAN CHANGE THE CHARACTER OF THEIR NEIGHBORHOOD AT ANY TIME. THEY NEED TO HAVE SOME ASSURANCE THAT THEIR INVESTMENT WILL BE PROTECTED.

IN GENERAL, WE AGREE WITH THE CONCEPT OF 'INFILL,' BUT WE BELIEVE THAT THE CITY SHOULD FOCUS ITS DEVELOPMENT EFFORTS ON NEIGHBORHOODS NEEDING ECONOMIC REVITALIZATION AND AFFORDABLE HOUSING. THE CITY SHOULD NOT TRY TO FIX WHAT IS NOT BROKEN. AND IT SHOULD NOTE THAT THIS DEVELOPER IS ADVERTISING THE PROPOSED HOMES FOR \$799,000 AND UP. THAT IS NOT AFFORDABLE HOUSING BY ANY STANDARD.

Thank you for your consideration.


Rodney J. Bacon and Greer G. Bacon
1308 E. 26th Avenue, Spokane, WA 99203


Jennings G. Bacon and Alexandra J. Johnson
1127 E. 28th Avenue, Spokane, WA 99203

Attn: Melissa Owen
Assistant Planner

Dear Melissa,

As a neighborhood, we support responsible development that respects the community. However, the E 27th Short Plat raises concerns in six key areas:

1. Neighborhood Character

This high-density development disrupts Rockwood's historic charm, space, and character. Designed by the Olmsted Brothers, the area was meant to preserve natural beauty, mature trees, and open spaces. Replacing this well-planned environment with an out-of-scale project erases what makes the neighborhood special—an irreversible loss of thoughtful design and historic appeal.

2. Stormwater Drainage Compliance

The stormwater plan is based on assumptions rather than soil testing, raising concerns about drainage, erosion, and flooding risks. With little oversight, future owners will be responsible for maintenance. Neglect could lead to increased runoff, impacting neighboring properties and city infrastructure. We request a more thorough review to ensure long-term stability.

3. Slope Stability and Setback Compliance

The excavation appears steeper than allowed without engineering approval. We request a professional review to ensure compliance with safety and setback regulations.

4. Parking Concerns

With no city parking requirements, neighbors risk losing street parking in front of their homes to the developer's expanding plans. Future buyers could add duplexes—without parking—flooding the street with 20+ cars. This will create chaos in a walkable neighborhood near a school. The city must act now to prevent a parking crisis.

5. SEPA Exception

The city must provide records demonstrating how it determined that existing regulations adequately mitigate the project's impacts. Under the State Environmental Policy Act (SEPA), any exemption must be justified with a detailed analysis of probable impacts and how they are addressed. This includes documentation on how issues such as stormwater, traffic, parking, slope stability, and neighborhood character are being managed. Transparency in this decision-making process is essential to ensure accountability and compliance with environmental and zoning laws.

6. Parcel 35294.2114 Status

The City should confirm whether parcel 35294.2114 has ever been anything other than vacant land. A review of tax history and legal status should clarify whether it was ever part of a larger developed lot or contained structures. If the house on parcel 35294.2113 previously encroached onto 35294.2114, this could impact its eligibility for subdivision. Since this parcel has only been taxed as vacant land, it should not automatically qualify for short plat treatment under Spokane's land-use regulations.

For the remaining comments, we will focus directly on the General Application Z25-111PSP.

The application states: "Dividing one 88-foot-wide lot into four separate lots."

2 General Application

Assessor's Parcel Numbers: 35294.2113, 35294.2114

Legal Description of Site: East 38' of Lot 21 and All of Lot 22

Size of Property: 12,003.08

List Specific Permits Requested in this Application: Short plat only

However, parcel 35294.2114 has always been taxed as vacant land and should not automatically qualify for short plat treatment under Spokane's land-use regulations.



Form 84 0001a

Real Estate Excise Tax Affidavit (RCW 82.45 WAC 458-61A)

Only for sales in a single location code on or after July 1, 2024.
This affidavit will not be accepted unless all areas on all pages are fully and accurately completed.
This form is your receipt when stamped by cashier. Please type or print.

☐ Check box if partial sale, indicate % _____ sold.

List percentage of ownership acquired next to each name.

1 Seller/Grantor

Name Northwest Textbook Depository Co., an Oregon Corporation,
successor by merger to Seeley Graham Co.

Mailing address 905 SW Vintner Dr Apt 452

City/state/zip Portland, OR 97225

Phone (including area code) _____

2 Buyer/Grantee

Name Urban Empire Homes, LLC, a Washington Limited Liability Company

Mailing address 7154 W State Street #320

City/state/zip Boise, ID 83714

Phone (including area code) _____

3 Send all property tax correspondence to: ☒ Same as Buyer/Grantee

Name _____

Mailing address _____

City/state/zip _____

List all real and personal property tax
parcel account numbers

Personal
property?

Assessed
value(s)

35294.2113

☐

\$ 663,620.00

35294.2112

☐

\$ 20,400.00

35294.2114

☐

\$ 40,800.00

4 Street address of property 1121 E 27th Ave, Spokane, WA 99203

This property is located in Spokane

☐ Check box if any of the listed parcels are being segregated from another parcel, are part of a boundary line adjustment or parcels being merged.

Legal description of property (if you need more space, attach a separate sheet to each page of the affidavit).

The East 10 feet of Lot 19 and all of Lots 20, 21 and 22, Block 3, McCrea & Merryweather's Addition in Manito Park, according to the plat thereof, recorded in Volume 1 of Plats, Page 28, records of Spokane County;

Situate in the City of Spokane, County of Spokane, State of Washington.

5 Land use code 11 - Household, single family units

Enter any additional codes 91 - Vacant Land
(see back of last page for instructions)

7 List all personal property (tangible and intangible) included in selling price.



Parcel History

35294.2114 View more parcel information		
This property is scheduled for inspection between October 2028 and May of 2029		
Site Address and Owner Info	Address	1121 E 27TH AVE
	City, State	SPOKANE, WA
Most-Recent Sale	Owner	URBAN EMPIRE HOMES, LLC
	Excise Number	202412873
	Sale Date	November 11th, 2024
Property Info	Sale Price	\$445,000
	Transfer Type	Statutory Warranty Deed
	Property Use	Vacant Land
	Tax Code Area	0010
	Land Size (Acres)	0.16

Parcel 35294.2114 was recorded and taxed as vacant land, meaning it was never officially developed. If the City is treating parcels 35294.2113 and 35294.2114 as a single lot, they need to provide evidence that parcel 35294.2114 was previously developed and taxed accordingly.



Legal Description of Site: East 38' of Lot 21 and All of Lot 22

General Application 3: Chapter 17D.010

3. Please explain how the proposal meets the concurrency requirements of SMC Chapter 17D.010.

→ Infill lot in developed, existing neighborhood.

Parcel 35294.2114 is not Developed.

General Application 5: Impact on the Environment or Surrounding Properties

5. Please explain any significant adverse impact on the environment or the surrounding properties the proposal will have and any necessary conditions that can be placed on the proposal to avoid significant effects or interference with the use of neighboring property or the surrounding area, considering the design and intensity of the proposed use.

Nothing significant - SEPA exempt
Already developed infill lot

6. Demonstrate how the proposed subdivision makes appropriate (in terms of capacity and concurrence) provisions for:

There is significant impact on the environment.

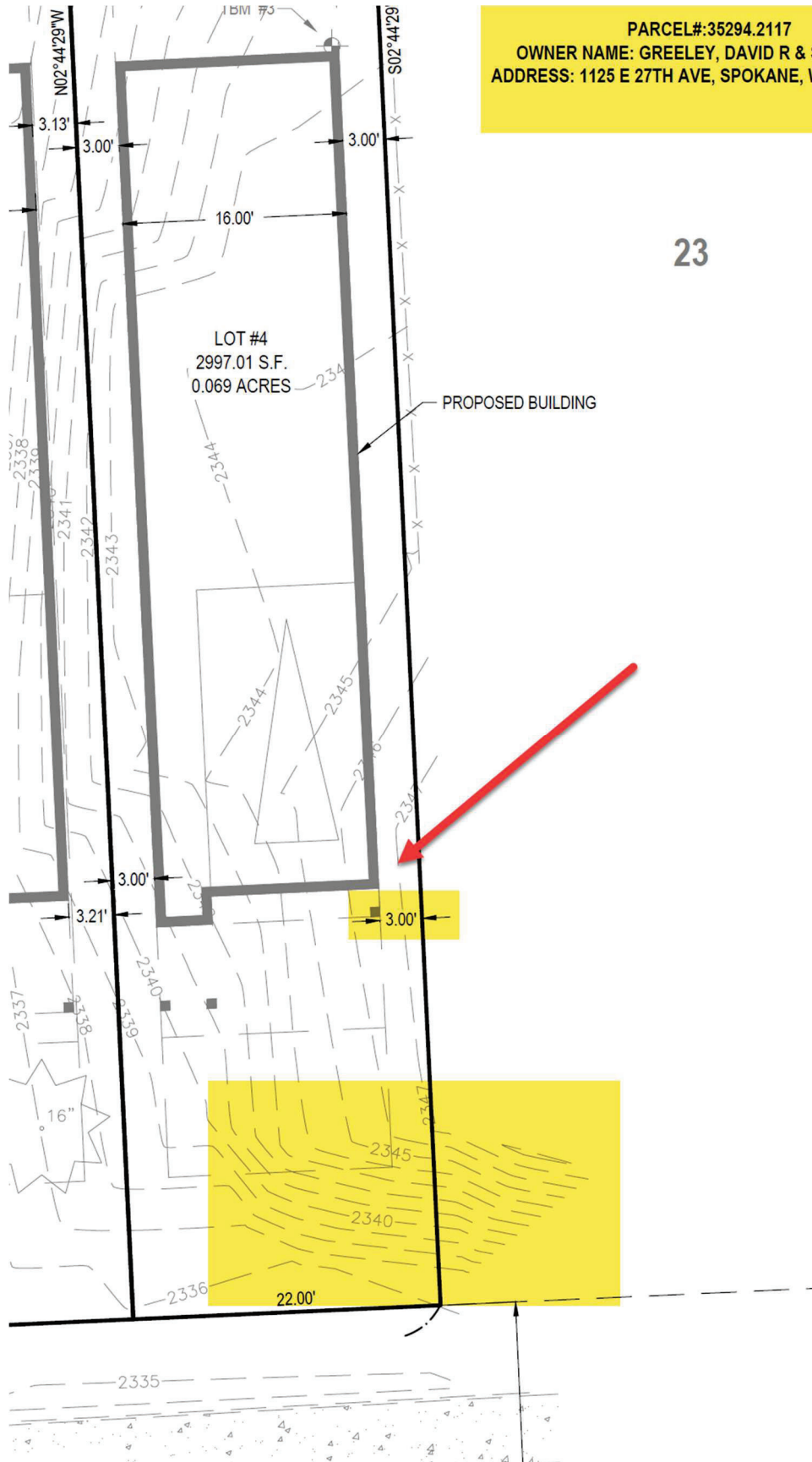
Stormwater management is a major concern, as the nearest sewer inlets for runoff are over 500 feet away at the intersection of 27th Avenue and Arthur Street, with water naturally flowing east. The reliability of the proposed stormwater infiltration plan is questionable, as it seems to be based on estimates rather than verified soil testing. If the system does not perform as intended, excess runoff could spill over into neighboring properties and 27th Avenue. Without properly designed swales, the project may heighten drainage challenges, accelerate erosion, and increase the risk of localized flooding, potentially causing lasting damage to surrounding infrastructure.

Slope safety is a significant concern. Slope stability and setback compliance remain critical concerns. The proposed 3-foot setback directly borders a 12-foot excavation that extends to the neighboring property line. The adjacent property owner intends to remove portions of the existing rock and replace it with soil for landscaping and fencing near the property line. To ensure long-term stability and prevent erosion, a professionally designed and engineered 12-foot rock wall is necessary. Additionally, the wall must be constructed entirely within the project site to avoid encroachment and mitigate the risk of sloughing or structural failure.



PARCEL#: 35294.2117
OWNER NAME: GREELEY, DAVID R & S
ADDRESS: 1125 E 27TH AVE, SPOKANE, V

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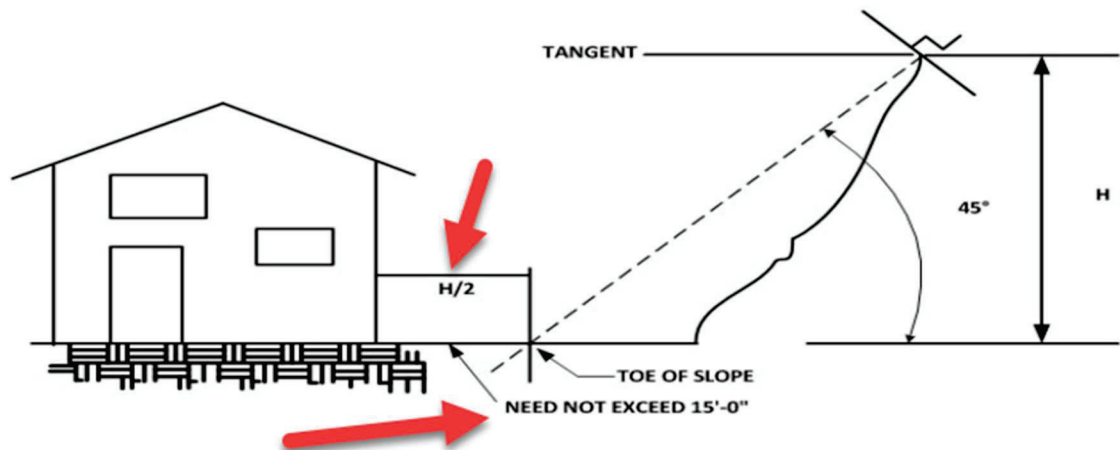


For a structure at the base of a slope, the setback must be a distance no less than $\frac{1}{2}$ the height of the slope. The height of the slope is 12 feet.

Spokane Slopes and Setbacks

Available at: <https://www.spokanecounty.org/DocumentCenter/View/663/BP-45-Slopes-and-Setbacks-PDF>

FIGURE 2



In conclusion, we urge the City to carefully review these issues before moving forward with project approvals. A more thorough evaluation will help ensure this project is done properly—not just for the developer, but for the long-term safety and well-being of our neighborhood.

For additional perspectives, please see Appendix A, which includes comments from concerned neighbors regarding this development.

Sincerely,

Rockwood Neighborhood Residents (names below)

Appendix A: Neighbor Comments on E 27th Short Plat

Alexis Lundgren – 1014 E 27th Ave

"I recently purchased in this neighborhood precisely because the street was very quiet and peaceful. I was unaware at the time of purchase that there was a planned high density development. I do not oppose the single-family residences planned, but am concerned about how four duplexes with the possibility of street parking will impact the neighborhood. I understand the intent behind approving urban infill projects is to increase affordable housing in the urban growth area. However, this developer built similar multi-family units on Manito Boulevard and they have been listed for nearly a year at 1.2 million and have not sold. This has not increased affordable housing. Please consider the impact on the neighborhood and the improbability that this development will further the City's intended goal of increasing affordable housing."

Greer Bacon – 1308 E 26th Ave

"The City should recognize that buying a house is the biggest investment that most families will ever make, and they cannot buy a house with confidence if the City can change the character of their neighborhood at any time without voter consent. They must have some assurance that the City will protect their interests, not just contractor interests."

Dennis Hession – 2818 S Scott St

"I have seen firsthand how poorly planned infill projects lead to long-term infrastructure problems. This development will increase parking congestion and disrupt existing traffic patterns, just like similar projects before it."

David Greeley – 1125 E 27th Ave

"I took a look at the excavation near the property line, and honestly, it looks too steep. Spokane's rules say that slopes shouldn't be steeper than 2:1 unless an engineer signs off on them, but this cut looks a lot sharper than that. If that dirt starts sloughing off, it could create stability problems for nearby properties, not to mention possible safety hazards. Before any more work is done, there should be a proper engineering review to make sure it's safe."

Chris Grubb, Professional Engineer (hired by David Greeley)

"The steepest allowable soil slope that is considered stable is 2H:1V: that is, for every 2-feet of horizontal distance, the slope may rise 1-foot (approximately 26.6-degrees from horizontal) and this slope may only be exceeded upon approval by a licensed professional engineer (typically, a geotechnical engineer). Though the rock strata that is visible at the front end of the west property line appears to be of such quality that a steeper final grade would be acceptable, it is incumbent upon the party responsible for the excavation to ensure the stability of the final slope with an inspection and approval letter from a registered design professional that has the relevant experience."

Mary Hatch – 1203 E 27th Ave

"Rockwood's history and charm are worth preserving. Allowing this kind of development is short-sighted and will permanently change the character of our neighborhood."

Craig Hemmens – 1027 E 27th Ave

"Spokane's lack of responsiveness to residents is unacceptable. They are prioritizing developers over the concerns of homeowners who actually live here. This process lacks transparency."

Kaitlin Velis – 1207 E 27th Ave

"This project will bring more traffic and construction hazards to our streets. Families with young children shouldn't have to worry about increased risks due to reckless development."

Beau Madsen – 1028 E 27th Ave

"While all for housing, growth in our city should be well planned and incorporate the neighborhood character and reasonable desires of the majority of impacted neighbors. This is not the plot or the street in which to create this dense of housing. I believe there are many areas near here and around the city that are much better suited. It doesn't need to be a single family house, but six housing units is shocking."

Adrien Mulawka – 2623 S Arthur St

"The developer is trying to push this through without proper review. This needs to be challenged before it sets a dangerous precedent for more irresponsible developments."

Carolyn Padgham – 1020 E 27th Ave

“The increased parking/traffic to our already narrow street will endanger pedestrian traffic, kids, pets, and neighborhood activity far beyond the construction of this duplex complex. I'm fine with single family dwellings being built, but NOT with this kind of short-sighted plan.”

Megan Read – 2531 S Magnolia St

“I’m concerned that this development is being approved without enough public input. Spokane should not allow this project to move forward without proper review.”

John Shuster – 1512 E 27th Ave

“I would emphasize the proposed on the street parking, and over-limit roof area of six out of character-for-the neighborhood new houses on an overtaxed, financially and infrastructurally, lot.”

Suzanne Greeley – 1125 E 27th Ave

“There’s supposed to be a long-term maintenance plan, but it’s not clear if there’s any real enforcement mechanism. Some larger developments have annual inspection requirements, but this project is small enough that it might not be monitored. That means we’re relying entirely on the owners to keep everything in working order, with no guarantee that they will. If these swales clog up or stop working, it’s our neighborhood that’s going to deal with the consequences. It would be a good idea to require some kind of ongoing compliance check.”

Michele Pager – 1118 E 27th Ave

“Our neighborhood deserves to be heard when it comes to the changes that will occur if the proposed development goes through according to the existing plans.”

Mark Stenersen – 1124 E 27th Ave

“The drainage report seems to contradict itself—on one hand, it says stormwater will be fully contained on-site, but then it also acknowledges possible overflow. That’s concerning.”

Mary Stohr – 1027 E 27th Ave

“This development threatens the mature trees that make our neighborhood beautiful. The city needs to enforce setback and environmental protections before it’s too late.”

Nick Velis – 1207 E 27th Ave

“This development will have a lasting negative impact. The city must require better oversight before allowing construction to move forward.”

Meg Stenersen – 1124 E 27th Ave

“Rockwood’s charm comes from its history, green spaces, and thoughtful planning. Hopefully, a solution can be found that allows the developer to be successful while also respecting the character of the neighborhood.”

Andrea Lundgren – 1014 E 27th Ave

“It is scary to think about a decline in value on the largest purchase of my life due to increased density that I’m sure none of the people on the growth management board or city council would want for their own neighborhoods.”

Alison Wais – 1011 E 27th Ave

“Spokane should be protecting its residents. I have not seen any affordable new homes.”