

March 17, 2026

Keisha Hood and Ronzai Saurombe
5808 N. Cristy Lane
Spokane WA, 99212

RE: Review of File # Z26-102CUP3 – Agape Care Assisted Living/Enhanced Services Facility
Conditional Use Permit

Keisha and Ronzai,

This letter is to inform you that the application materials for the above-mentioned conditional use permit at 3224 E. 28th Avenue were found to be technically incomplete, based on a review required under Spokane Municipal Code (SMC) 17G.061.120, Determination of a Complete Application. The following comments were received from various departments and agencies and include comments that require addressing before this application can be considered technically complete and moved onto the notice of application phase of the CUP application process.

Engineering – Joelie Eliason:

Revisions Required.

The following items must be addressed prior to approval of the conditional use permit:

1. The parking area that is currently gravel on the east side of the driveway will need to be paved or blocked from vehicles via fencing, landscaping, or curbing.
 - a. If pavement or additional impervious hard surfacing is added to the site or the parking lot is replaced (excluding maintenance activities such as sealing and overlaying), a stormwater plan and report, prepared by a Professional Engineer licensed in the State of Washington, may be required.



2. If onsite parking is provided (e.g. parking lot), all striped stalls and adjacent drive aisles must meet the minimum development standards. Development standard tables are available here: <https://my.spokanecity.org/smc/?Section=17C.230.140>.

- a. Please provide a dimensioned site plan showing any striped parking stalls, drive aisle widths, paved areas, etc.

Planning – Melissa Owen:

Revisions/Clarification Required.

3. Please update the project narrative (separate general application answers provided above the address of site proposal) to clarify the following aspects of the proposal:
 - a. That the project intends to utilize the larger existing structure for the assisted living facility.
 - b. That the smaller home is proposed to be used as a private residence and ADU (not for use in association with the conditional use)
 - c. That the project intends to utilize existing access and parking on the site.
 - i. If parking is to be expanded, please advise so that planning can review for any additional parking lot requirements that may need to be met.
 - ii. Please also see comments from engineering regarding paved areas and parking lot requirements.
 - d. Please clarify if care givers will be living at the assisted living facility or in other structures on the site (note: this information is needed for group living density calculations).
 - e. Please confirm that stays are at least 30 days/month-to-month. If stays are arranged for timeframes that are less than month-to-month, please advise.
4. In compliance with [Section 17G.061.110](#) Please update the site plan details to include:
 - f. Correct property dimensions (update parcel depth for primary parcel to 225').
 - g. Add additional small parcel with property dimensions (50' wide by 44.5 deep per legal description).
 - h. Update the label for the small home current identified as "structure" to "private home with ADU" or other appropriate label if the home with new proposed ADU not intended for group living use behind the care center.
 - i. Please identify the location of refuse collection.
 - j. Please dimension the outdoor spaces to be used to meet outdoor area requirements under 17C.330.120(C).
 - i. Include dimensions for the second deck areas and patio if they are intended to be used as outdoor space for the assisted living facility.
 - k. Please clarify if the existing playground is associated with the private home or the assisted living facility.
 - i. Provide dimensions if this is intended to be used to address outdoor space requirements for the assisted living facility.

Planning General Comment.

Additional conditions related to new parking may be applicable. Please see comments from engineering regarding the unpaved area shown on the site plan. Once it is clear if additional parking will be provided, planning will provide updated conditions.

Other Department/Agency Comments & Conditions of Approval.

The following is an accounting of other department comments which do not require any action at this time or revisions submittal. Comments below include preliminary approvals and conditions of approval that will be shown as recommendations in the staff report on this proposal.

City of Spokane Integrated Capital Management – Inga Note (email dated 02/25/26)

No concerns.

City of Spokane Treasury – Cara Geiger (email dated 02/26/26)

Approved by Treasury.

Fairchild AFB – Kyle Krupanski, 1st Lt, USAF (email dated 02/27/26)

This is considered compatible development with Fairchild AFB.

City of Spokane Streets Dept – Harley Dobson, Assoc. Traffic Engineer (email dated 03/05/26)

No comment at this time from the Street Department

Lincoln Heights Neighborhood Council –Carol Tomsic, NC Chair (email dated 03/09/26)

The applicant met with our residents. We don't have any comments at this time.

Conditions of Approval

Spokane Tribe of Indians – Randy Abrahamson, Tribal Historic Preservation Officer (letter dated 02/25/26)

Conditions of Approval.

- A. Any ground disturbing activity associated with this site will require an Inadvertent Discovery Plan (IDP) implemented into the scope of work and kept on site at all times.

City of Spokane Fire Prevention – Justin Cravalho (email dated 03/10/26)

Conditions of Approval.

- A. The City recently passed Ordinance No. 36695 to revise portions of the Spokane municipal fire code (SMC 17F.080) that went into effect as of January 1, 2026.
- B. If constructed as an Enhanced Services Facility, the building will be required to be provided with fire sprinklers. (IFC 903)
- C. If constructed as an Assisted Living Facility, the building will be required to be provided with fire sprinklers. (IFC 903)
- D. If constructed as an Enhanced Services Facility, a fire alarm system with central monitoring is required in accordance with the Municipal Code including the provision for “Special Areas to be Protected”. (IFC 907 amended by SMC 17F.080.110)
- E. If constructed as an Assisted Living Facility, a fire alarm system with central monitoring is required in accordance with the Municipal Code including the provision for “Special Areas to be Protected”. (IFC 907 amended by SMC 17F.080.110)
- F. Where a commercial kitchen is provided with equipment that will produce grease vapors, a Class I kitchen hood is required and will be protected with a wet-chemical suppression system (IFC 606.2). In addition, a Class K fire extinguisher will be located no more than 30 feet from the area of grease cooking (IFC 906.1). The type of equipment that is considered to generate grease vapors is established by the International Mechanical Code.
- G. Fire Department approved all-weather access must be provided to within 200 feet of any point around the outside of a building (IFC 503.1.1) along an acceptable path of travel from an approved fire apparatus setup location. For fully sprinklered buildings, this is extended to 240 feet (IFC 503.1.1, exception 1).

City of Spokane Planning – Melissa Owen
Conditions of Approval.

- A. A Boundary Line Adjustment (BLA) to aggregate the two parcels will be required prior to permit issuance for the change of use?
- B. The solid waste collection area will need to meet screening requirements of [Section 17C.200.070](#) Screening and Impact Abatement
- C. Please be advised that long term bicycle parking for a minimum of 2 bikes will be required as a condition of approval based on a 12-16-bed facility. Additional long-term bicycle parking may be required if staff will be living on site. Long-term Bicycle Parking will need to meet the requirements of [Section 17C.230.200](#)(D) Bicycle Parking.

Due to the need for additional information this application is thus deemed technically incomplete and will be halted until such is resubmitted. You have 60 days from the receipt of this letter to provide the required data in accordance with SMC 17G.061.120. If additional time is warranted, a request in writing for an extension may be granted by the Planning and Development Director. If requested data or an extension request are not received within 60 days, all application materials and a portion of fees paid will be returned your client. Please submit an updated SEPA checklist with the above requested information.

If you have any questions regarding these requirements, please reach out at 509-625-6063.

Sincerely,



Melissa Owen
Senior Planner
City of Spokane

Enclosures (in order of receipt):

City of Spokane Integrated Capital Management – Inga Note (email dated 02/25/26)

Spokane Tribe of Indians – Randy Abrahamson, Tribal Historic Preservation Officer (letter dated 02/25/26)

City of Spokane Treasury – Cara Geiger (email dated 02/26/26)

Fairchild AFB – Kyle Krupanski, 1st Lt, USAF (email dated 02/27/26)

City of Spokane Streets Dept – Harley Dobson (email dated 03/05/26)

Lincoln Heights Neighborhood Council –Carol Tomsic, NC Chair (email dated 03/09/26)

City of Spokane Fire Prevention – Justin Cravalho (email dated 03/10/26)

City of Spokane DSC Engineering – Joelle Eliason (memo dated 03/10/26)

City of Spokane Planning – Melissa Owen (incorporated into this letter)

From: [Note, Inga](#)
To: [Owen, Melissa](#)
Subject: RE: RFC - Z26-102CUP3 - Agape Care Assisted Living/Enhanced Services Facility Conditional Use Permit
Date: Wednesday, February 25, 2026 7:51:31 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)

No concerns.

From: Owen, Melissa <mowen@spokanecity.org>
Sent: Tuesday, February 24, 2026 1:51 PM
To: Abrahamson, Randy <randya@spokanetribe.com>; Adams, Jonathan R. <jradams@spokanecity.org>; Development Services Center Addressing <eradsca@spokanecity.org>; Allen, Mark V. <mvalen@spokanecity.org>; Allenton, Scotty <sallenton@spokanecity.org>; Tagnani, Angela <atagnani@spokanecity.org>; Averyt, Chris <caveryt@spokanecity.org>; Avista <SpokaneCountyRE@avistacorp.com>; Lori Barlow <lbarlow@spokanevalley.org>; mbasinger <mbasinger@spokanevalley.org>; zbecker <zbecker@cawh.org>; Black, Tirrell <tblack@spokanecity.org>; Brown, Eldon <ebrown@spokanecity.org>; Brown, Rich (Cheney SD Operations) <rbrown@cheneysd.org>; Buller, Dan <dbuller@spokanecity.org>; Carveth, Brenna (County Public Works) <bcarveth@spokanecounty.org>; Chanse, Andrew <achanse@spokanelibrary.org>; Chesney, Scott <schesney@spokanecounty.org>; Chouinard, Sonya <SonyaC@spokaneschools.org>; Coleman, Cindy (SPS) <CindyCo@spokaneschools.org>; Corkins, Karen <karen@s3r3solutions.com>; Cravalho, Justin <jcravalho@spokanecity.org>; Dahl, Lance <idahl@spokanecity.org>; David Moore <David.J.Moore@usace.army.mil>; Deatrich, Kerry <kdeatrich@spokanecity.org>; Dept. of Archaeology and Historic Preservation <sepa@dahp.wa.gov>; Dept. of Ecology Shorelines <EROShorelineNotices@ecy.wa.gov>; Development Review Spokane Transit <developmentreview@spokanetransit.com>; Development Services Center Building Plans Examiner <eradsbpe@spokanecity.org>; DFW <r1planning@dfw.wa.gov>; distrate (dcistrate@spokanecounty.org) <dcistrate@spokanecounty.org>; DNR <sepacenter@dnr.wa.gov>; DNR Aquatics <dnrreaqleasingrivers@dnr.wa.gov>; Dobson, Harley <hdobson@spokanecity.org>; Eliason, Joelle <jeliason@spokanecity.org>; Engineering Admin <eraea@spokanecity.org>; Fairchild AFB Community Projects <92CES.CEN.CommunityProjCoord@us.af.mil>; Figg, Greg <figgg@wsdot.wa.gov>; Finger, Jeanne <jfinger@spokanecity.org>; Fredrickson, Beryl <bfredrickson@spokanecity.org>; Garcia, Luis <lgarcia@spokanecity.org>; Gardner, Spencer <sgardner@spokanecity.org>; Geiger, Cara <cgeiger@spokanecity.org>; Gennett, Raylene <rgennett@spokanecity.org>; Greene, Barry <BGreene@spokanecounty.org>; Grimm, Kevin <KevinGr@spokaneschools.org>; Hamad, Nicholas <nhamad@spokanecity.org>; Hamlin, Heather <hhamlin@spokanecity.org>; Hanson, Tonilee <sajbinfo@gmail.com>; Harris, Clint E. <ceharris@spokanecity.org>; Hayden, Adam <ahayden@spokanecity.org>; Hayes, Meagan <Meagan.Hayes@ecy.wa.gov>; Heitstuman, Kelly <kheitstuman@spokanecity.org>; Historic Preservation <preservation@spokanecity.org>; Hughes, Rick <rhughes@spokanecity.org>; Jennings, Brian (STA) <BJennings@spokanetransit.com>; Johnson, Erik D. <edjohnson@spokanecity.org>; Johnson, Jeffrey <jeffrey.johnson.64@us.af.mil>; Jones, Garrett <gjones@spokanecity.org>; Jordan, Jess <dale.j.jordan@usace.army.mil>; Kapaun, Megan <mkapaun@spokanecity.org>; Kasey



Spokane Tribe of Indians
Tribal Historic Preservation Officer
P.O. Box 100 Wellpinit WA99040

2/25/2026

TO: Mellissa Owen, Planner

RE: Z26-102CUP3- Agape Care Assisted Living / Enhanced Services Facility

Ms. Owen

Thank you for contacting the Tribe's Historic Preservation Office. We appreciate the opportunity to provide cultural consent for your project; the intent of this process is to preserve and protect all cultural resources whenever protection is feasible.

After archive research, of the project mentioned above, we didn't locate any cultural resources in the APE, and at this time we have no concerns or comments.

Recommendation: This project will require an Inadvertent Discovery Plan (IDP) implemented into the scope of work and kept on site at all times.

However, if any artifacts or human remains are found upon excavation this office should be immediately notified and the work in the immediate area cease.

Should additional information become available, or the scope of work change, our assessment may be revised. Again, thank you for this opportunity to comment on and consider this a positive action that will assist in protecting our shared heritage.

If questions arise, please contact me at (509) 258 – 4222.

Sincerely,

Randy Abrahamson
Spokane Tribal Historic Preservation Officer (T.H.P.O.)

From: [Geiger, Cara](#)
To: [Owen, Melissa](#)
Cc: [Taxes and Licenses](#)
Subject: RE: RFC - Z26-102CUP3 - Agape Care Assisted Living/Enhanced Services Facility Conditional Use Permit
Date: Thursday, February 26, 2026 11:12:26 AM
Attachments: [image005.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

Approved by Treasury.



Cara Geiger | CITY OF SPOKANE | TAXES & LICENSES SPECIALIST

509.625.6070 main | 509.625.6341 personal | cgeiger@spokanecity.org | spokanecity.org

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

Working Hours M-F 7am-3:30pm

From: Owen, Melissa <mowen@spokanecity.org>
Sent: Tuesday, February 24, 2026 1:51 PM
To: Abrahamson, Randy <randya@spokanetribe.com>; Adams, Jonathan R. <jradams@spokanecity.org>; Development Services Center Addressing <eradsca@spokanecity.org>; Allen, Mark V. <mvallen@spokanecity.org>; Allenton, Scotty <sallenton@spokanecity.org>; Tagnani, Angela <atagnani@spokanecity.org>; Averyt, Chris <caveryt@spokanecity.org>; Avista <SpokaneCountyRE@avistacorp.com>; Lori Barlow <lbarlow@spokanevalley.org>; mbasinger <mbasinger@spokanevalley.org>; zbecker <zbecker@cawh.org>; Black, Tirrell <tblack@spokanecity.org>; Brown, Eldon <ebrown@spokanecity.org>; Brown, Rich (Cheney SD Operations) <rbrown@cheneysd.org>; Buller, Dan <dbuller@spokanecity.org>; Carveth, Brenna (County Public Works) <bcarveth@spokanecounty.org>; Chanse, Andrew <achanse@spokanelibrary.org>; Chesney, Scott <schesney@spokanecounty.org>; Chouinard, Sonya <SonyaC@spokaneschools.org>; Coleman, Cindy (SPS) <CindyCo@spokaneschools.org>; Corkins, Karen <karen@s3r3solutions.com>; Cravalho, Justin <jcravalho@spokanecity.org>; Dahl, Lance <idahl@spokanecity.org>; David Moore <David.J.Moore@usace.army.mil>; Deatrich, Kerry <kdeatrich@spokanecity.org>; Dept. of Archaeology and Historic Preservation <sepa@dahp.wa.gov>; Dept. of Ecology Shorelines <EROShorelineNotices@ecy.wa.gov>; Development Review Spokane Transit <developmentreview@spokanetransit.com>; Development Services Center Building Plans Examiner <eradsccbpe@spokanecity.org>; DFW <r1planning@dfw.wa.gov>; distrate (dcistrate@spokanecounty.org) <dcistrate@spokanecounty.org>; DNR <sepacenter@dnr.wa.gov>; DNR Aquatics <dnrreaqualeasingrivers@dnr.wa.gov>; Dobson, Harley <hdobson@spokanecity.org>; Eliason, Joellie <jeliason@spokanecity.org>; Engineering Admin <eraea@spokanecity.org>; Fairchild AFB Community Projects <92CES.CEN.CommunityProjCoord@us.af.mil>; Figg, Greg

From: [92 CES/CEN Community Proj Coord](#)
To: [Owen, Melissa](#)
Subject: RE: RFC - Z26-102CUP3 - Agape Care Assisted Living/Enhanced Services Facility Conditional Use Permit
Date: Friday, February 27, 2026 10:43:28 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)

[CAUTION - EXTERNAL EMAIL - Verify Sender]

CUI

Good morning,

This is considered compatible development with Fairchild AFB.

Very Respectfully,

KYLE D. KRUPANSKY, 1ST Lt, USAF
Deputy Engineering Flight Commander
Community Planner
92 CES/CENP
Fairchild AFB, WA
DSN: 647-3937 COMM: 247-3937

CUI

From: Owen, Melissa <mowen@spokanecity.org>
Sent: Tuesday, February 24, 2026 1:51 PM
To: Abrahamson, Randy <randya@spokanetribe.com>; Adams, Jonathan R. <jradams@spokanecity.org>; Development Services Center Addressing <eradsca@spokanecity.org>; Allen, Mark V. <mvallen@spokanecity.org>; Allenton, Scotty <sallenton@spokanecity.org>; Tagnani, Angela <atagnani@spokanecity.org>; Averyt, Chris <caveryt@spokanecity.org>; Avista <SpokaneCountyRE@avistacorp.com>; Lori Barlow <lbarlow@spokanevalley.org>; mbasinger <mbasinger@spokanevalley.org>; zbecker <zbecker@cawh.org>; Black, Tirrell <tblack@spokanecity.org>; Brown, Eldon <ebrown@spokanecity.org>; Brown, Rich (Cheney SD Operations) <rbrown@cheneysd.org>; Buller, Dan <dbuller@spokanecity.org>; Carveth, Brenna (County Public Works) <bcarveth@spokanecounty.org>; Chanse, Andrew <achanse@spokanelibrary.org>; Chesney, Scott <schesney@spokanecounty.org>; Chouinard, Sonya <SonyaC@spokaneschools.org>; Coleman, Cindy (SPS) <CindyCo@spokaneschools.org>; Corkins, Karen <karen@s3r3solutions.com>; Cravalho, Justin <jcravalho@spokanecity.org>; Dahl, Lance

From: [Dobson, Harley](#)
To: [Owen, Melissa](#)
Subject: Z26-102CUP3 Agape Care Assisted Living CUP
Date: Thursday, March 5, 2026 3:10:25 PM

No comment at this time from the Street Department

Thank you,



Harley Dobson | City of Spokane | Associate Traffic Engineer – Street Department
509.232.8845 | hdobson@spokanecity.org

From: [Carol Tomsic](#)
To: [Owen, Melissa](#)
Subject: Re: RFC - Z26-102CUP3 - Agape Care Assisted Living/Enhanced Services Facility Conditional Use Permit
Date: Monday, March 9, 2026 8:24:53 PM
Attachments: [image002.png](#)
[image004.png](#)
[image003.png](#)

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hi Melissa

Thank you for sharing.

The applicant met with our residents.

We don't have any comments at this time.

Carol Tomsic
Chair, Lincoln Heights Neighborhood Council

On Tuesday, February 24, 2026 at 01:51:29 PM PST, Owen, Melissa <mowen@spokanecity.org> wrote:

Good afternoon,

Please find attached the request for comments, general application with narrative, supplemental application, and site plan for the following project:

Project Name: Agape Care Assisted Living/Enhanced Services Facility Conditional Use Permit

File Number: Z26-102CUP3

Site Address: 3224 and 3206 E. 28th Ave. (Parcels 35273.0205 and 35273.0224), SW ¼, SEC. 27, T. 25 N., R. 43 E., W.M.

Please note that the signed application includes additional sheets with a project narrative that is not visible on the attached PDF general application form.

Please direct any questions or comments to Melissa Owen, Senior Planner at mowen@spokanecity.org by **Tuesday, March 10th, 2026, at 5:00 PM.**

Development Services Center is open Monday, Tuesday, Thursday, and Friday 8 am – 5 pm in person (11 am – 5 pm each Wednesday), [online](#) or over the phone at 509.625.6300!

From: [Cravalho, Justin](#)
To: [Owen, Melissa](#)
Subject: Re: RFC - Z26-102CUP3 - Agape Care Assisted Living/Enhanced Services Facility Conditional Use Permit
Date: Tuesday, March 10, 2026 10:33:52 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[Outlook-unjpwqa.png](#)

Good morning Melissa,

Please see below for Fire's comments:

1. The City recently passed Ordinance No. 36695 to revise portions of the Spokane municipal fire code (SMC 17F.080) that went into effect as of January 1, 2026.
2. If constructed as an Enhanced Services Facility, the building will be required to be provided with fire sprinklers. (IFC 903)
3. If constructed as an Assisted Living Facility, the building will be required to be provided with fire sprinklers. (IFC 903)
4. If constructed as an Enhanced Services Facility, a fire alarm system with central monitoring is required in accordance with the Municipal Code including the provision for "Special Areas to be Protected". (IFC 907 amended by SMC 17F.080.110)
5. If constructed as an Assisted Living Facility, a fire alarm system with central monitoring is required in accordance with the Municipal Code including the provision for "Special Areas to be Protected". (IFC 907 amended by SMC 17F.080.110)
6. Where a commercial kitchen is provided with equipment that will produce grease vapors, a Class I kitchen hood is required and will be protected with a wet-chemical suppression system (IFC 606.2). In addition, a Class K fire extinguisher will be located no more than 30 feet from the area of grease cooking (IFC 906.1). The type of equipment that is considered to generate grease vapors is established by the International Mechanical Code.
7. Fire Department approved all-weather access must be provided to within 200 feet of any point around the outside of a building (IFC 503.1.1) along an acceptable path of travel from an approved fire apparatus setup location. For fully sprinklered buildings, this is extended to 240 feet (IFC 503.1.1, exception 1).

Thank you.

MEMORANDUM



Development Services Center

DATE: March 10, 2026
TO: Melissa Owen, Senior Planner
FROM: Joelie Eliason, Engineering Technician IV – Development Services
THROUGH: Eldon Brown, P.E., Principal Engineer – Development Services
FILE NO: Z26-102CUP3
SUBJECT: Agape Care Assisted Living/Enhanced Services Facility Conditional Use Permit Type 3

CONDITIONAL USE PERMIT COMMENTS:

The following items must be addressed prior to approval of the conditional use permit:

1. The parking area that is currently gravel on the east side of the driveway will need to be paved or blocked from vehicles via fencing, landscaping, or curbing.
 - a. If pavement or additional impervious hard surfacing is added to the site or the parking lot is replaced (excluding maintenance activities such as sealing and overlaying), a stormwater plan and report, prepared by a Professional Engineer licensed in the State of Washington, may be required.



Date: March 10, 2026

Comments: Z26-102CUP3

(Continuation)

2. If onsite parking is provided (e.g. parking lot), all striped stalls and adjacent drive aisles must meet the minimum development standards. Development standard tables are available here:

<https://my.spokanecity.org/smc/?Section=17C.230.140>.

- a. Please provide a dimensioned site plan showing any striped parking stalls, drive aisle widths, paved areas, etc.

CC: Development Services File

Tami Palmquist, AICP, Director, Development Services
Mike Nilsson, P.E., Principal Engineer, Development Services
Adam Hayden, Associate Engineer, Development Services
Dalton Kuhn, Senior Engineer, Development Services
Erik Johnson, Engineering Technician IV, Development Services