December 13, 2023  
WCE No. 2021-3109

City of Spokane  
808 W. Spokane Falls Boulevard  
Spokane WA, 99201

Attn: Melissa Owen, Associate Planner

Re: Response to Determination of Incompleteness  
Beard Addition – A Residential Subdivision and PUD

Dear Ms. Owen:

This letter is to confirm receipt and respond to the determination of incompleteness for the Beard Addition Preliminary Long Plat and PUD letter received November 22, 2023 (dated October 13, 2023), for City of Spokane file number Z23-190PPUD. For clarity, City of Spokane and agency comments are listed below and in italic type, and our responses are in roman type (upright).

Planning:
Corrections Required.
The following comments are required to be address prior to deeming the application Technically Complete.

1. The way tracts A1 and A2 are represented are a little different from the prior map to the current revised submittal. Is tract A1 still essentially represented by the boundary of the wetland/wetland mitigation area? Does it include the 50’ wide wetland buffer?  

   WCE Response: Tract “A1” consists of the boundary of the wetland within the preliminary plat. It should be noted that a small portion of the wetland lies outside of the preliminary plat, which is why Tract “A1” is slightly smaller than the total wetland area as seen on Sheet PP7. This portion outside of the Preliminary Plat Boundary is on Lot 6, Block 5 of the Final Plat of Westridge.

Items to be addressed prior to final plat approval (authorization to print, sign, record).

1. Please update Westridge Lane to Snowcrest Street to match the alteration to Westridge Addition PUD/Plat as applicable. While a portion of map includes the new street name the area near the intersection with 21st still includes the Westridge name. This will need to be addressed prior to engineering plan approval.

   WCE Response: Westridge Lane is listed as existing on the preliminary plat to indicate that the alteration has not yet been approved. If approval of the alteration is obtained prior to the application is deemed technically complete, WCE may remove the existing Westridge Lane indication depending on additional comments received.
2. Please add the county recording numbers for expanded rights of way at Cumberland Street and Snowcrest Street.

   **WCE Response**: WCE is working through a plat amendment for the Westridge Plat, which is not complete at this point. This comment will be addressed prior to final plat/PUD approval.

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**Engineering – Development Services Center (DSC)**

Corrections Required.

The following items must be addressed prior to approval of the preliminary plat:

1. Please change 23rd and 24th to have Ave as the suffix instead of St.

   **WCE Response**: The suffix for 23rd and 24th has been updated to Ave.

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The following comments must be addressed prior to approval of the final plat:

**Integrated Capital Management (ICM) Traffic Planning (re: Fire Access)**

1. Please see email dated 11/14/23 related to neighborhood fire access concerns. Planning has assessed this comment to be general in nature and that no correction to plat materials is requested for required at this time. Please note that planning has forwarded this comment to the fire department staff for additional feedback.

   **WCE Response**: Additional trip analysis was submitted to the City of Spokane on November 22, 2023. Additional correspondence between WCE and the City and County will allow/require H Street to be extended from 25th Avenue to 26th Avenue as a 24’ gravel road.

**Integrated Capital Management (ICM) Traffic Planning and WA State Dept. of Transportation (re: Traffic Analysis):**

The following requested analysis needs to be addressed prior to deeming the application technically complete as per email from Inga Note that includes Greg Figg and Whipple Engineering staff on November 2, 2023 (email attached). The City of Spokane and WSDOT are currently awaiting this analysis from WCE.

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2. *We agree that a PM peak analysis of the Garden Springs / Rustle off-ramp is reasonable because this project will add about 40 trips to it.*

   **WCE Response**: This comment is noted and was included in the additional trip analysis submitted November 22, 2023.

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3. *Update the trip distribution figures to match the change from 192 to 199 units. WSDOT wants to be able to track the trips going to/from US 195. And since we have a new hearing examiner it would be helpful to have a single document to reference.*

   **WCE Response**: This comment is noted and was included in the additional trip analysis submitted November 22, 2023.
4. We agree that no analysis of US 195 is needed as long as the turn restriction at 16th is built. Unless WSDOT gets their financial guarantee soon from the Nascimento-Paras partnership, the Beard project will likely have a condition that they can’t move beyond a certain number of units until the turn restriction is in place.

   **WCE Response:** This comment is noted.

WA state Department of Ecology:

5. Matt Fisher from Matt Fisher, WA Dept. of Ecology Wetland/Shorelands Specialist verified via email that he accepted the updated rating – ecology is satisfied with the rating and the mitigation plan. Additionally, Mr. Fisher identified that an Administrative Order (AO) is under development and that ecology comfortable with the city moving the project forward in the application process (see attached email dated 11/20/23).

   **WCE Response:** This comment is noted and a copy of the AO is attached.

6. Other Comments received from the public prior to the public comment period:

7. No additional comments from the public were received as part of the 3rd request for agency comments.

If you have any questions or comments regarding this letter please feel free to contact me at (509) 893-2617.

Sincerely,

[Signature]

Austin J. Fuller, Assistant Planner
Whipple Consulting Engineers, Inc.

Encl: Updated preliminary plat

CC: Sponsor
File