



Whipple Consulting Engineers, Inc.

WCE No. 22-3414  
June 20, 2024

City of Spokane, Development Services  
ATTN: Ali Brast, senior planner  
808 W Spokane Falls Boulevard  
Spokane, WA 99201

Re: **Illinois Assisted Living – A Conditional Use Permit  
Supplemental Information and Development Narrative**

Dear Ms. Brast:

This letter is intended to provide a development narrative as well as a response to the questions identified in the CUP Application that includes an in-depth description of the proposed project as well as provide the supplemental information that is requested in the applications.

The 2600 E. Illinois Conditional Use Permit proposes to develop approximately 2.75 acres of land into two residential care facilities: one 16-bed Enhanced Service Facility (ESF) as defined in RCW 70.97 and WAC 388-107, and one 16-bed Intensive Behavioral Health Treatment facility. The subject property is located on assessor parcel number 35091.2706 at 2600 E. Illinois Avenue. The project will access the public street system via North Crescent Avenue, which is an unimproved right-of-way along the project frontage. The project site is in the SE  $\frac{1}{4}$  of the NE  $\frac{1}{4}$  of Section 9, Township 25 N., Range 43 E.W.M. The property is currently vacant land with short shrubs on the south side of the property.

#### **Sewer System**

There is an 8-inch sewer line located within N. Regal Street approximately 13 feet +/- below grade that will be extended to the site using a gravity sewer system. Preliminary sewer use calculations are attached to this letter.

#### **Water System**

The City of Spokane has a 6-inch distribution main within North Crescent Avenue. Preliminary water use calculations are attached to this letter.

#### **Storm Drainage**

This project proposes to convey stormwater to catchments or pond areas to treat and discharge the treated stormwater as required by the SRSM to the underlying soils, via swales, ponds, drywells, retention and/or detention ponds, galleries, etc.

### **Conditional Use Permit Application**

The following items are required to be answered on the Conditional Use Permit application; however, due to space restrictions on the application, the questions and answers can be found below:

1. List the provisions of the land use code that allow the proposal.

**WCE Response:** The following provisions of the land use code allow the proposal:

- SMC Table 17C.111.100-1 identifies group living as a limited/conditional use type.
- SMC Section 17C.111.110(A) identifies group living standards as a conditional use for more than 12 residents.
- SMC Table 17G.061.010-1 identifies a Conditional Use Permit requiring a Hearing Examiner Decision as a Type III application.
- SMC 17C.320.080(F) describes the requirements of group living within residential zones and is outlined below.

2. Please explain how the proposal is consistent with the comprehensive plan designation and goals, objectives and policies for the property.

**WCE Response:** The proposal is consistent with the comprehensive plan designation and goals, objectives and policies for the property in the following ways:

*Goal SH 2 – Enable and encourage development patterns and uses of public and private property that are responsive to the facility requirements of special needs populations.*

The project as proposed will implement Goal SH 2 through the following polices:

*Policy SH 2.1 – Care Facilities*

There are no other group living facilities requiring a Conditional Use Permit within 600 feet of this project; therefore, this criterion is met.

*Policy SH 2.2 – Special Needs Temporary Housing*

There are no nearby special needs temporary housing locations in the existing neighborhood; therefore, this criterion is met.

*Policy SH 2.3 – Compatible Design of Special Needs Facilities*

The proposed structures will be of a similar type and design to the adjacent apartment complex to the east; therefore, this criterion is met.

*Goal LU 5 – Development Character*

The project as proposed will implement Goal LU 5 through the following policy:

*Policy LU 5.5 – Compatible Development*

The proposed infill development is compatible with the adjacent apartment and residential uses through implementation of the Goals and Policies of SH 2.

*LU 4 –Transportation*

The project as proposed will implement Goal LU 4 through the following policy:

*LU 4.1 Land use and transportation*

This project includes a trip generation and distribution letter, which forecasts the future transportation needs of the project. This project as required will participate in the city's impact fee ordinance to mitigate transportation impacts from this development.

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

**WCE Response:** The project will be routed to all applicable agencies regarding concurrency requirements prior to a public hearing. In brief, the project proposes to meet concurrency requirements in the following ways:

- i. Transportation: the project will not add any additional densities not considered in the comprehensive plan and agrees to pay the City of Spokane Traffic Impact Fees associated with the region.
- ii. Public Water: the additional water services will be reviewed by The City of Spokane Public Works and is in the Retail Water Service Area. Please see the proposed water use calculations. Comments from City of Spokane Water Department staff in the pre-development conference notes indicate that water is anticipated to be approximately 80-85 psi at surrounding hydrants, which will meet city requirements of 45 psi for fire flow and potable water.
- iii. Fire Protection: The City of Spokane Capital Facilities Plan (Appendix C of the comprehensive plan) references the Washington Survey and Rating Bureau and states that areas greater than five road miles from a fire station receive a 9A rating and typically an increase of insurance rates. The project site is located 1.6 road miles from Station 2 at 1001 E. North Foothills Drive. The project will not add any additional densities not considered in the comprehensive plan.
- iv. Police Protection: The City of Spokane Capital Facilities Plan identifies that the city has funding to support an adequate level of service for police through 2023. The project will not add any additional densities not considered in the comprehensive plan.
- v. Parks and Recreation: No parks are required or proposed for this project. The nearest park is Courland Park, approximately 1.7 miles away.
- vi. Library: the project will not add any additional densities not considered in the comprehensive plan.
- vii. Solid Waste disposal and recycling: the project will not add any additional densities not considered in the comprehensive plan.
- viii. Schools: The project site is currently served by Logan Elementary, Yasuhara Middle School and North Central High School. The project does not propose housing students, so no impact is anticipated to schools in the area.

- ix. Public wastewater (sewer and stormwater): Sewer and storm sewer for the vicinity of the project, with stormwater leading to drywells for infiltration. Please see the provided sewer use calculations. The project will not add any additional densities not considered in the comprehensive plan.

4. If approval of a site plan is required, demonstrate how the property is suitable for the proposed use and site plan. Consider the following: physical characteristics of the property, including but not limited to size, shape, location, topography, soils, slope, drainage characteristics, the existence of ground or surface water and the existence of natural, historic or cultural features.

**WCE Response:** The size and shape of the property is suitable for the two proposed structures as shown in the site plan. The location of the property is near public transit, within reasonable distance of available sewer and water facilities, and within reasonable distance of fire protection. The topography of the site generally slopes from the north to south and is at a grade suitable for construction. The soils and slope are suitable for the site, and the drainage characteristics are suitable for construction, as the site will have onsite stormwater storage. Shallow groundwater is not present onsite, and there are no wetlands or surface water features onsite. Finally, there are no known natural, historic or cultural features onsite; however, a cultural resource survey will be conducted if requested.

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.

**WCE Response:** The design and intensity of the proposed use will not be significantly greater than the multifamily residential uses to the east and south of the property; therefore, no significant impacts are anticipated with this project.

### **Legal Description**

35091.2706

ROSS PARK NE LESS R/W L3TO8 B270

### **Consistency with Policies, Regulations, and Criteria**

This project as proposed will adhere to all policies, regulations, and criteria set forth by SMC 17C.320.080(F) as follows:

F: Institutional and Other Uses in Residential Zones.

These approval criteria apply to all conditional uses in RA through RHD zones. The approval criteria allows institutional uses (including expansions of existing facilities), allows increases to the maximum occupancy of group living, and permits other non-residential household living uses in a residential zone. These types of uses must maintain or must

not significantly conflict with the appearance and function of residential areas. The approval criteria are:

*1. Proportion of Residential Household Living Uses.*

*The overall residential appearance and function of the area will not be significantly lessened due to the increased proportion of uses not in the residential household living category in the residential area. Consideration includes the proposal by itself and in combination with other uses in the area not in the residential household living category and is specifically based on the:*

*a. number, size and location of other uses not in the residential household living category in the residential; and*

**WCE Response:** The site is surrounded by multifamily residential uses with no non-residential household uses in the general vicinity of the site.

*b. intensity and scale of the proposed use and of existing residential household living uses and other uses.*

**WCE Response:** The intensity and scale of the proposed use is compatible with the multifamily residential uses to the east and south.

*2. Physical Compatibility.*

*a. The proposal will be compatible with adjacent residential developments based on characteristics such as the site size, building scale and style, setbacks and landscaping; or*

**WCE Response:** The intensity and scale of the proposed use is compatible with the multifamily residential uses to the east and south.

*b. The proposal will mitigate differences in appearance or scale through such means as setbacks, screening, landscaping and other design features.*

**WCE Response:** No additional design features for mitigation are proposed with this project.

*3. Livability.*

*The proposal will not have significant adverse impacts on the livability of nearby residential zoned lands due to:*

*a. noise, glare from lights, late-night operations, odors and litter; and*

**WCE Response:** This project is not anticipated to generate additional noise or glare that would affect the livability of nearby residential zoned lands, as the project will be a compatible type and scale to the adjacent multifamily developments to the east and south.

*b. privacy and safety issues.*

**WCE Response:** This project is not anticipated to generate additional privacy and safety issues.

*4. Public Services.*

*a. The proposed use is in conformance with the street designations of the transportation element of the comprehensive plan.*

**WCE Response:** The project proposes access on North Crescent Avenue, a local access road which connects to Greene Street.

- b. The transportation system is capable of supporting the proposed use in addition to the existing uses in the area. Evaluation factors include:
- i. street capacity, level of service and other performance measures;  
**WCE Response:** The proposed development does not add capacity not considered in the City of Spokane Comprehensive Plan. North Crescent Avenue will be improved along the project frontage, making it capable of supporting the proposed care facilities.
  - ii. access to arterials;  
**WCE Response:** North Crescent Avenue has access to Greene Street, a major arterial.
  - iii. connectivity;  
**WCE Response:** The project site has connectivity to the east and west, which allows for further access to the public road system via Greene Street. No connectivity is proposed to the north, as the BNSF railway is directly north of the property.
  - iv. transit availability;  
**WCE Response:** The project is less than half a mile away from STA bus stop Greene @ Jackson, for routes 33 and 39.
  - v. on-street parking impacts;  
**WCE Response:** No on-street parking is proposed; however, frontage improvements along North Crescent Avenue are proposed, which would reduce impact from on-street parking, if any.
  - vi. access restrictions;  
**WCE Response:** The site does not propose access restrictions.
  - vii. neighborhood impacts;  
**WCE Response:** No neighborhood impacts are proposed beyond that of those typically expected of a care facility. The project is directly adjacent to an apartment complex to the east and multifamily residences to the south, which are comparable land uses.
  - viii. impacts on pedestrian, bicycle and transit circulation;  
**WCE Response:** No impacts to pedestrian, bicycle and transit circulation are proposed. The project proposes frontage improvements on North Crescent Avenue, thereby improving pedestrian circulation in the immediate area.
  - ix. safety for all modes; and  
**WCE Response:** The project proposes frontage improvements on North Crescent Avenue, thereby improving pedestrian safety in the immediate area.
  - x. adequate transportation demand management strategies.  
**WCE Response:** No impacts to existing transportation demand management strategies are proposed beyond those already contemplated in the City of Spokane Comprehensive Plan.

c. Public services for water supply, police and fire protection are capable of serving the proposed use, and proposed sanitary waste disposal and stormwater disposal systems are acceptable to the engineering services department.

**WCE Response:** The pre-development notes for the project indicate that the project site has adequate public services for water supply, police and fire protection are capable of serving the proposed use, and proposed sanitary waste disposal and stormwater disposal systems are acceptable to the engineering services department.

This project will adhere to the following policies, regulations and criteria set forth by SMC Chapter 17C.330: Group Living:

**Resident Density** – The allowed residential density in the RMF Zone is 2.5 residents per 1,000 square feet. The site is approximately 120,000 square feet, which would allow for up to 300 residents. This project proposes 32 residents, well under the maximum density.

**Minimum Spacing** – Group living facilities that are conditional uses must be at least 600 feet from a site with any other group living facility that is also a conditional use. This item has been met, as the proposed facilities are not within 600 feet of another conditional use group living facility.

**Required Outdoor Area** – The property is within the RHD Zone and is therefore exempt from this section of the requirements.

**Parking and Loading** – This project proposes to follow all parking requirements stated in SMC Chapter 17C.230.

This project will adhere to the following policies, regulations and criteria set forth by SMC 17G.061.110: Application Requirements:

**Predevelopment Meeting** – A pre-development meeting for the project was held on April 4, 2024 under file number B24M0035PDEV.

**Community Meeting and Public Notice** – A public community meeting was held on May 8, 2024, and noticed in accordance with the standards set forth in SMC 17G.061.110(B)(4).

**Preliminary Plat Application and Map Requirements** – This project will contain all applications in the same form and content as a Conditional Use Permit as provided in SMC 17G.061.110(C) and (D)(1).

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

Thank you,

A handwritten signature in blue ink, appearing to read 'Ray Kimball', with a long horizontal flourish extending to the right.

Ray Kimball, P.E.  
Whipple Consulting Engineers, Inc.

RDK/ajf