

November 30, 2021

Melissa Owen, Planner
City of Spokane
808 W. Spokane Falls Blvd.
Spokane, WA 99201

10.02.2021 Written Narrative updated to indicate removal of Spokane County Assessor's Parcel 25361.0004 from the proposal

RE: Latah Glen Residential Community (updates in *bold italics*)– Written Narrative for Type III PUD/MHP Application for development of a *39.44-Acre* Manufactured Home Park – *APN: 25364.0001*.

Dear Ms. Owen,

This summary is included as a required part of a Planned Unit Development (PUD) and Conditional Use Permit (CUP) applications for the subject project. The intent of this summary is to identify project consistency with applicable policies, regulations and criteria for approvals.

Background (updates in *bold italics*)

On 12/05/2019, the project proponent met with City of Spokane staff for a Pre-Development Conference about the subject project proposal (Pre-Dev No. B19M0123DEV) to build the Latah Glen Residential Community, a manufactured home park, on the parcels *25361.0001 & 25361.0004* in southwest Spokane. *The extension of the S. Inland Empire Way Public Right-of-Way adjacent to and outside the Burlington Northern Railroad R.O.W. located at the east edge of parcel 25364.0004 as required by the City of Spokane has made it unfeasible to include parcel 25361.0004 in the proposal, though it remains within the project proponent's control.*

The project parcel is not intended to be subdivided but is intended to have one address with single ownership. This project would replace auto parts salvage activities on the subject parcel with approximately 157 affordable manufactured homes on leased spaces with access to a community clubhouse area and an extensive pedestrian walkway system.

The proposed project includes private roads and private utilities. A 27-foot wide roadway width is proposed with parking restricted to one side and an alternative sidewalk and comprehensive pathway system. Since this differs from City roadway development standards, staff comments included the need to pursue a Design Standard Variance from

City of Spokane Residential Street Standards, per SMC 17H.010.020. With input from City staff, the Site Plan was updated, and a formal Design Variance Request has been made and approved by the City of Spokane Engineering Department.

Staff also informed the proponent that a variance to reduce the roadway width from standard is not approvable through the Manufactured Home Park (MHP) application process and requires a Planned Unit Development overlay (PUD) application in addition to the Conditional Use permit application for the MHP. PUD applications must go through the Design Review process, and we had our Design Review Collaborative Workshop on August 12, 2020. *A letter from the Design Review Board provided their recommendations regarding the Latah Glen PUD to the Hearing Examiner on 12.09.2020.*

Following our Collaborative Workshop, we provided public notice on September 8, 2020, and conducted a Community Meeting on September 23, 2020, per Code requirements. Required documents associated with this meeting have been included with our application for agency review of the project within 120 days of the Community Meeting.

Project Information (updates in *underlined bold italics*)

The *prompts* below are included from City Code that we prepared **responses** initially for the Design Review Board. We submit these prompts and our **responses**, with minor modifications, as project narrative and support for the attached Type III PUD/MHP application:

1. *Statement of development objectives. For example, include building square footage and approximate number of residential units (if applicable).*

Latah Glen Residential Community is proposed as a gated manufactured home community, intended to increase low-maintenance, affordable housing options for the City of Spokane's residents.

The Concept Site Plan includes 157 lease spaces with the most common lease space dimensions being 55 feet wide by 95 feet deep. While actual units will vary, three manufactured home models of different sizes and floor plans are shown in the Concept Building Details to represent the type of manufactured homes that are envisioned to be placed on the leased spaces. Units are anticipated to be approximately 1,340 SF, 1,460 SF, and 1,580 SF. All units will be required to have an attached 2-car garage that will be built on-site after the unit is installed or prefabricated garages installed concurrently with the homes; garages will be set back from the roadway to accommodate off-street parking on

the driveway that will not obstruct the road or sidewalk in front of the lease space.

An approximately 1,700 SF clubhouse is proposed for community and management use. The clubhouse is proposed to include a leasing office, restrooms, a room for gatherings, and an exercise facility. The clubhouse is proposed to include a fenced outdoor patio with a possible spa, and possible gas fire pit and/or barbeque(s).

Parking on the private roads will be restricted, per the anticipated Roadway Standards Design Variance approval and site management parking policy with enforcement by site management. On-street parking restrictions are offset by the availability of off-street garage and driveway parking on each lease space as well as the dedicated off-street parking spaces provided strategically throughout the development; ample off-street parking is proposed in the clubhouse vicinity in anticipation of the area attracting higher volume community use.

Please see the Site Plan and Concept Building Details sheet for more information.

2. *Describe design goals, site opportunities and constraints, site character, architectural character, and how the project fits within the local context.*

Design goals:

- Meet or exceed minimum net density requirements for the site of 4 units per acre.
- Provide primary gated vehicle access from S Inland Empire Way.
- Provide emergency vehicle access to/from S. Marshall Road.
- Provide vehicle and emergency vehicle access to/from all lease spaces.
- Include interconnected system of sidewalks along roads and pathways in common areas to provide safe pedestrian access to and from all lease spaces, off-street parking spaces, site amenities, and public rights-of-way at S Inland Empire Way and S Marshall Road.
- Preserve existing trees and vegetation where possible in lieu of a 20' perimeter landscape buffer.

Site Character, Opportunities and Constraints:

The neighborhood is isolated from the overall City roadway system by US 195 to the northeast, Burlington Norther Santa Fe (BNSF) railroad Right-of-

Way to the east southeast, and steep slopes along with surface waters to the west and north.

The BNSF Right-of-Way currently provides limited access for Dept. of Natural resources property south of the site via S inland Empire Way. The City sees an opportunity to extend the *S. Inland Empire Way R.O.W. through the property controlled by the project proponent* to the DNR property to the south-southeast and *has required a R.O.W. dedication (location TBD)* of from the *north* edge of *APN: 235361.0004* at S Inland Empire Way *to the project site together with an area in the NW corner of APN: 25364.0001 (the project site)* in order to make a connection to the DNR property and avoid the BNSF Right-of-Way; *the street connection and project site dedication are shown on the attached, updated Site Plan.*

Approximately one third of the site consists of steep slopes, largely populated with trees and other vegetation. The slopes with vegetation naturally buffer the site from views from the DNR property to the south, from the west along much of the S Marshall Road frontage, and a portion of the RV Village property to the north. We see an opportunity to retain the existing topography and natural vegetation as a natural buffer in these areas.

Approximately two-thirds of the site contains low to moderate slopes suitable for building, some of it treed. Much of that area is littered with wrecked autos and RVs, used for parts salvage. The site is currently accessed via frontage on S Inland Empire Way, where there is an existing pole building shop/garage and an attached mobile home unit/office for the auto salvage business. We see an opportunity to provide affordable housing options for the Spokane community and improve site aesthetics to be in-line with the existing neighborhood character.

There is a buildable area at the top of the steep slopes and adjacent to S Marshall Road in the northwest corner of the site that is currently inaccessible by automobile via the primary site access at S Inland Empire Way. We see an opportunity to grade in a roadway to access that area from below and provide an additional way for emergency vehicles to gain access to the entire site.

The Fish Lake Trail public right-of-way intersects the public right-of-way of S Marshall Road near the southwest corner of the project site. We see an opportunity for community members to access these public rights-of-way as well as the S inland Empire Way public right-of-way via the interconnected system of sidewalks and pathways along with the emergency access noted at the west edge of the Site Plan.

Architectural Character:

The proposed buildings have a craftsman architectural character and have asphalt shingle roofs with trim and siding options like fiber cement board, hardwood siding, engineered wood siding, masonry, stone, stucco, or vinyl siding backed with oriented strand board.

Neighborhood Character:

This isolated neighborhood has an established character which includes an existing manufactured home community and a site that rents spaces for RVs/Tiny Homes. Both sites have roadways that deviate from City Design Standards; either they were developed with a narrower pavement section and/or they do not include sidewalks. The RV site includes an attached sidewalk on one side without planter strip or street trees, while the manufactured home community includes a narrow private road without sidewalks and few street trees.

The proposed project would replace the unsightly and incongruent character of the auto salvage yard with a use and character better suited to its local context.

3. *Note how the proposal addresses issues in the Comprehensive Plan and any other applicable design plans or guidelines; i.e., The Downtown Plan and Design Guidelines.*

The proposal addresses the following City of Spokane Comprehensive Plan elements, goals, and/or policies as follows:

LU1 – Citywide Land Use

Goal: Offer a harmonious blend of opportunities for living, working, recreation, education, shopping, and cultural activities by protecting natural amenities, providing coordinated, efficient, and cost-effective public facilities and utility services, carefully managing both residential and non-residential development and design, and proactively reinforcing downtown Spokane’s role as a vibrant urban center.

- **The project expands single-family living options in the City.**
- **The project preserves natural vegetation in the ample steep slope areas on site.**
- **The project will utilize and improve upon existing public infrastructure.**

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.

- **The project protects and improves upon the character of this isolated neighborhood by replacing auto salvage activities with a manufactured home community that reflects the existing neighborhood aesthetic.**

LU 1.16 Mobile Home Parks

Designate appropriate areas for the preservation of mobile and manufactured home parks.

Discussion: Manufactured and/or mobile home parks provide affordable housing to many city residents. In many cases, they provide the opportunity of home ownership to households which cannot afford to purchase other types of housing. When existing manufactured home parks are redeveloped, many homeowners are unable to move their homes to other sites. Additionally, redeveloped mobile and manufactured home parks are generally not replaced by new parks within the city, resulting in a net loss of this type of housing.

- **The project expands on an important affordable living option within the City that is specifically acknowledged as being gentrified.**

LU2 – Public Realm Enhancement

LU 2.1 Public Realm Features

Encourage features that improve the appearance of development, paying attention to how projects function to encourage social interaction and relate to and enhance the surrounding urban and natural environment.

- **The project is committed to the use of newer generation manufactured home units with 2-car garages that appear nearly identical to traditional, site-built single-family homes, in contrast to the stereotypical, aesthetically distinctive “mobile homes” of the past.**
- **The project capitalizes on its unique topography and resulting natural beauty by emphasizing pedestrian connectivity as an amenity, which encourages social interaction in the natural environment while allowing for social distancing practices.**

LU 3 EFFICIENT LAND USE

Goal: Promote the efficient use of land by the use of incentives, density and mixed-use development in proximity to retail businesses, public services, places of work, and transportation systems.

- **The project meets minimum net density requirements for the Residential Single-Family Zone.**

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.

- **The project will help efficiently expand City infrastructure through dedication of the S Inland Empire Way ROW.**

LU 4.4 Connections

Form a well-connected network which provides safe, direct and convenient access for all users, including pedestrians, bicycles, and automobiles, through site design for new development and redevelopment.

- **The project includes a reserved area for potential dedication and expansion of the S Inland Empire Way ROW.**

LU 5 DEVELOPMENT CHARACTER

Goal: Promote development in a manner that is attractive, complementary, and compatible with other land uses.

- **The proposed project replaces an unsightly auto parts salvage yard with development that compliments the neighborhood character.**

LU 5.4 Natural Features and Habitat Protection

Ensure development is accomplished in a manner that protects significant natural features and wildlife habitat.

- **The proposed project retains steep slope, naturally treed areas in lieu of a built landscape buffer wherever possible.**

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.

- **The project represents an important affordable senior housing opportunity that increases housing diversity in the City of Spokane.**

4. *Describe any departures from design standards and note how the proposed alternatives are equal to or better than standard*

The only known variance from design standards proposed is the roadway section – see the Concept Site Plan. The section includes reduced roadway and ROW widths; the section has a sidewalk separated by a pedestrian buffer on one side of the road and a pathway in lieu of sidewalk and pedestrian buffer on the opposite side. This variance has been addressed with the City Engineering Department, who is anticipated to approve the variance after the Concept Site Plan and proposed roadway section was updated per City comments.

5. *Description of Design Evolution. Describe what design alternatives have been explored, why choices have been made, and any limiting factors. This description can be written and/or graphic.*

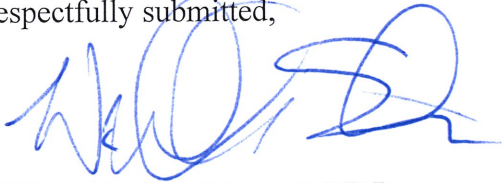
The design was initially proposed with the clubhouse area, 163 manufactured home lease spaces, and roadways in the same general configuration to meet design goals and take advantage of site opportunities. The roadways proposed were drawn narrower than they are now with an attached sidewalk on one side and did not include street trees, considered the industry standard with an intention to restrict on-street parking throughout the project. There was some pedestrian connectivity across blocks and the Inland Empire road frontage included more lease spaces than are currently shown.

City Pre-Development comments included concerns that each lease space did not have immediate access to a sidewalk and that sidewalks along roadways needed a pedestrian buffer. The Plan was updated to include the current, wider road section along with a more robust alternative pathway system that provides pedestrian access to/from all the lease spaces, amenities, and public rights-of-way.

The Plan has also evolved to include a 60-foot-wide reserved area for the potential extension of S Inland Empire Way. This has reduced the number of lease spaces the Site will accommodate to approximately 157, and still exceeds the minimum net density requirement of 4 units per acre.

Following a boundary survey of the site, it was determined that Assessor information did not accurately reflect the shape of parcel 25361.0004. Once the required Inland Empire Way R.O.W. is taken away from that parcel, it is unfeasible to include it in the proposed project. The project is now proposed on APN: 25364.0001 alone.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'William Sinclair', written over a light blue circular stamp or watermark.

William Sinclair, P.L.A., MURP
Storhaug Engineering

CC: William Nascimento, Sycamore Group LLC, File