



**Agenda Sheet for City Council Meeting of:**  
10/19/2015

<b>Date Rec'd</b>	10/6/2015
<b>Clerk's File #</b>	ORD C35310
<b>Renews #</b>	
<b>Cross Ref #</b>	
<b>Project #</b>	
<b>Bid #</b>	
<b>Requisition #</b>	

<b>Submitting Dept</b>	PLANNING & DEVELOPMENT
<b>Contact Name/Phone</b>	TIRRELL BLACK 625-6185
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<b>Agenda Item Type</b>	First Reading Ordinance
<b>Agenda Item Name</b>	0670 - ORDINANCE RELATING TO APPLICATION Z1400065COMP

**Agenda Wording**

An Ordinance amending the text of the City of Spokane Comprehensive Plan chapter 3, Land Use, adopting a new policy entitled "LU 1.X Mobile Home Parks."

**Summary (Background)**

This proposal is a Comprehensive Plan text amendment to add a new Land Use Policy regarding the location of appropriate areas to preserve mobile and manufactured home parks. The new policy is designated "LU 1.X Mobile Home Parks" and would be added to Chapter 3, Land Use, of the City of Spokane's Comprehensive Plan. The Plan Commission Held a Public Hearing on September 23, 2015 to consider this amendment and recommended denial of the amendment. Plan Commission Findings and Conclusions attached

<b>Fiscal Impact</b>	<b>Budget Account</b>
Neutral \$	#
Select \$	#
Select \$	#
Select \$	#

<b>Approvals</b>		<b>Council Notifications</b>	
<b>Dept Head</b>	MEULER, LOUIS	<b>Study Session</b>	
<b>Division Director</b>	SIMMONS, SCOTT M.	<b>Other</b>	PCED 9/28/15 / PC
<b>Finance</b>	DAVIS, LEONARD	<b>Distribution List</b>	
<b>Legal</b>	RICHMAN, JAMES		lhattenburg@spokanecity.org
<b>For the Mayor</b>	SANDERS, THERESA		tblack@spokanecity.org
<b>Additional Approvals</b>			smsimmons@spokanecity.org
<b>Purchasing</b>			jrichman@spokanecity.org
			lmeuler@spokanecity.org
			ngwinn@spokanecity.org
			jsnyder@spokanecity.org / bstum@spokanecity.org

FIRST READING OF THE ABOVE ORDINANCE  
WAS HELD ON

10/26/2015

AND FURTHER ACTION WAS DEFERRED

[Signature]

CITY CLERK

PASSED BY  
SPOKANE CITY COUNCIL:

11/2/2015

[Signature]

CITY CLERK

ORDINANCE NO. C35310

AN ORDINANCE amending the text of the City of Spokane Comprehensive Plan chapter 3, Land Use, adopting a new policy entitled "LU 1.X Mobile Home Parks."

WHEREAS, in compliance with the Washington State Growth Management Act, chapter 36.70A RCW (the "GMA"), the City of Spokane adopted a Comprehensive Plan on May 21, 2001; and

WHEREAS, the GMA requires continuing review and evaluation of the Comprehensive Plan and contemplates an annual amendment process for incorporating necessary and appropriate revisions to the Comprehensive Plan; and

WHEREAS, pursuant to RCW 36.70A.070(2)(c), the GMA requires jurisdictions to identify sufficient land for manufactured housing; and

WHEREAS, according to a June 2007 publication by the Washington State Housing Finance Commission ("Manufactured Housing Community Article"), manufactured housing communities are one of the largest sources of unsubsidized affordable housing in Washington State and provide affordable housing for about 500,000 people, or approximately 8 percent of Washington's residents, many of them elderly; and

WHEREAS, according to the Manufactured Housing Community Article, in Washington State, approximately 143 communities have closed in the 15 years prior to 2007, displacing more than 4,000 families, and between May 2006 and December 2007, another 38 communities closed, displacing another 1,400 households; and

WHEREAS, for a majority of the residents displaced by manufactured home park community closures, residents may likely lose their homes because many older "mobile Homes" cannot be moved and must be demolished at the homeowner's expense; and

WHEREAS, even when a mobile home can be moved, the homeowners often cannot find another park with room for their home; and

WHEREAS, while these communities continue to close in Washington, it is believed few are opening to take their place; and

WHEREAS, no new mobile/manufactured home parks have been proposed in Spokane for over a decade; and

WHEREAS, pursuant to GMA's requirement to identify sufficient land for manufactured housing, the City Council previously adopted Resolution 2014-0103 requesting a Comprehensive Plan Amendment in 2015 that would establish a policy of

preserving manufactured housing as an affordable housing option in the City of Spokane; and

WHEREAS, following the City Council's adoption of Resolution 2014-0103, the City Council submitted an application seeking to amend Comprehensive Plan Chapter 3, Land Use, to add a new policy to designate appropriate areas for the preservation of mobile and manufactured home parks; and

WHEREAS, the proposed amendment does not seek to designate any particular mobile or manufactured home park or property for preservation but instead will establish a forum for exploring feasible methods for ensuring a sufficient supply of land for mobile and manufactured home parks in the future and for preserving mobile and manufactured home parks as an affordable housing option in the City of Spokane; and

WHEREAS, an annual survey of manufactured home parks conducted by the City of Spokane reported a total of 1,174 units in 19 manufactured home parks inside the City in 2015; and

WHEREAS, the 2015 Spokane area 80 percent median income limit used by the U.S. Housing and Urban Development Department to define a low-income, two-person family is \$41,300 annually; and

WHEREAS, the Spokane County Assessor's office reported in 2015 that 279 households within manufactured home parks in the city of Spokane participated in a homeowner property tax relief program for seniors and persons with disabilities with annual household incomes of less than \$35,000; such household income is less than the defined limit for area low-income families of any size; and

WHEREAS, the rate of participating households in property tax relief for seniors and persons with disabilities per residence type, based on the total of 1,174 units in the city's manufactured home parks, is more than three times the rate reported for other owner-occupied housing types in the city; and

WHEREAS, the high use of property tax relief by occupants in manufactured home parks in the city of Spokane indicates that those occupants are more likely to be seniors or disabled and have lower household income than people within the general population of the city; and

WHEREAS, manufactured home parks are a source of affordable single-family and senior housing to low-income households in Spokane; and

WHEREAS, the Washington Department of Commerce reported in March 2015 that the Manufactured Housing Relocation Fund was sufficient to reimburse only 89 low-income applicants statewide; and

WHEREAS, under current funding levels for the Washington Manufactured Housing Relocation Fund, increases in manufactured home park closures elsewhere in the state could increase the time by which local homeowners affected by a park closure would wait for reimbursement in the event of a park closure in the city of Spokane; and

WHEREAS, the proposed amendment is consistent with GMA's requirement that jurisdictions subject to the GMA must have a Comprehensive Plan that "...identifies sufficient land for housing, including, but not limited to, government-assisted housing, housing for low-income families, manufactured housing, multifamily housing, and group homes and foster care facilities;" [RCW 36.70A.070(2)(c)]; and

WHEREAS, the amendment is consistent with planning Goal #4 of the Growth Management Act: "Housing. Encourage the availability of affordable housing to all economic segments of the population of this State; promote a variety of residential densities and housing types; and encourage preservation of existing housing stock." [RCW 36.70A.020]; and

WHEREAS, the amendment is consistent with Goal H 1, Affordable Housing, of the City of Spokane Comprehensive Plan to provide sufficient housing for the current and future population that is appropriate, safe, and affordable for all income levels; and

WHEREAS, the preservation of manufactured home parks will help to maintain a sufficient amount of manufactured homes and other types of affordable housing units for the current and future population; and

WHEREAS, the State Housing Trust Fund has diminished in size; and

WHEREAS, the number of vacant affordable rentals available to low-income families reported by the Spokane Low Income Housing Consortium among its member housing providers has declined since 2011, the number of vacant units decreasing from 162 to 74 over that period, despite an increase in the combined number of occupied and vacant units offered by these providers, from 2,413 units to 3,210 units (2,371 of which are located in the city of Spokane); and

WHEREAS, the amendment is consistent with Comprehensive Plan Policy H 1.9, Low-Income Housing Development, to support and assist the public and private sectors in developing low-income or subsidized housing for households that cannot compete in the market for housing by using federal, state, and local aid; and

WHEREAS, the amendment is consistent with Comprehensive Plan Goal H 2, Housing Choice and Diversity, to increase the number of housing alternatives within all areas of the city to help meet the changing needs and preferences of a diverse population; and

WHEREAS, the preservation of manufactured home parks is consistent with Comprehensive Plan Policy H 2.2, Senior Housing, in that it would retain manufactured

housing among other forms in the city's housing stock as one alternative that allows senior homeowners to age in place; and

WHEREAS, the amendment is consistent with Comprehensive Plan Policy 3.3, Housing Preservation, to encourage preservation of viable housing; and

WHEREAS, manufactured home parks in Spokane exist in areas designated for residential, industrial and commercial use; and

WHEREAS, the preservation of manufactured home parks in certain areas may not be appropriate due to the community's expected transition of the property to other uses, or for other reasons which may be determined; and

WHEREAS, Spokane Municipal Code chapter 17G.020 "Comprehensive Plan Amendment Procedure" identifies terms and conditions for Comprehensive Plan amendments; and

WHEREAS, staff requested comments from agencies and departments on January 22, 2015, and a public comment period ran from March 9 to May 15, 2015; and

WHEREAS, the Spokane City Plan Commission held workshops regarding this proposed Comprehensive Plan amendment on April 8, July 22, and August 26, 2015; and

WHEREAS, stakeholder group meetings regarding the text amendment were held on June 17 and July 9, 2015; and

WHEREAS, a State Environmental Policy Act (SEPA) Checklist and Determination of Non-Significance were released on September 4, 2015 for the Comprehensive Plan text changes. The public comment period for the SEPA determination ended on September 23, 2015; and

WHEREAS, notice of the SEPA Checklist and Determination, the text amendment, and announcement of the September 23, 2015 Plan Commission Public Hearing were published in the Spokesman-Review on September 9 and 16, 2015; and

WHEREAS, the Washington State Department of Commerce and appropriate state agencies were given the required 60-day notice on September 14, 2015, before adoption of proposed changes to the Comprehensive Plan; and

WHEREAS, the City Plan Commission conducted a public hearing and deliberated on September 23, 2015, for the Application Z1400065COMP and other proposed amendments; and

WHEREAS, the Plan Commission voted 5 to 1 to recommend denial of Application Z1400065COMP, and further recommended that a Plan Commission

housing review program should be put on the 2016 Plan Commission work program; and

WHEREAS, the Spokane City Council held a public hearing on the proposed text amendment on \_\_\_\_\_, to accept public testimony relating to this matter; and

WHEREAS, after this amendment to the Comprehensive Plan is enacted by the City Council, it is anticipated that the City will conduct a public process to determine what implementation strategy to pursue, and whether or not that strategy will involve any change to local development regulations; and

WHEREAS, the Plan Commission and City Council will both hold public hearings on any future proposed amendments to the Unified Development Code; and

WHEREAS, the Spokane City Council, after considering all of the testimony and evidence, finds the proposed text amendment Application Z1400065COMP supports the health, safety, and welfare and is in the best interest of the residents of the City of Spokane; and

WHEREAS, the proposed amendment does not designate any particular mobile or manufactured home park(s) or property for preservation but instead establishes a forum for exploring feasible approaches to ensuring a sufficient supply of land for mobile and manufactured home parks in the future and for preserving mobile and manufactured home parks as an affordable housing option in the City of Spokane; and

WHEREAS, the City Council adopts the recitals set forth herein as its findings and conclusions in support of its adoption of this ordinance and further adopts the findings, conclusions from the Planning and Development Staff Report for the same purposes; -- Now, Therefore,

The City of Spokane does ordain:

Section 1. That Application Z1400065COMP is approved.

Section 2. That the text of Chapter 3, Land Use, of the City of Spokane Comprehensive Plan is amended to read as follows:

**LU 1.X 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.

ADOPTED BY THE CITY COUNCIL ON November 2, 2015

Brian Stout  
Council President

Attest:

Terri Hoge  
City Clerk

Approved as to form:

Jane  
Assistant City Attorney

Veto 11/16/15  
Mayor

\_\_\_\_\_  
Date

12-16-2015  
Effective Date



**STAFF REPORT ON COMPREHENSIVE PLAN  
TEXT AMENDMENT APPLICATION FILE NO. Z1400065-COMP  
SPOKANE CITY COUNCIL**

**I. SUMMARY OF REQUEST AND RECOMMENDATIONS:**

**DESCRIPTION OF PROPOSAL:** This application, initiated by Council Member Jon Snyder by direction from the Spokane City Council, requests to add a new policy to Chapter 3, Land Use, of the Comprehensive Plan. The new policy would be added to support Land Use Goal LU 1, Citywide Land Use. It authorizes the designation of appropriate areas where manufactured home parks should be preserved.

**Note:** Citizen comment letters are included in the file.

**II. GENERAL INFORMATION:**

Agent/Applicant:	Council Member Jon Snyder, on behalf of the Spokane City Council
Location of Proposal:	Locations unknown - to be determined within the city of Spokane
Zoning/Land Use Plan Designation:	Varies
SEPA Status:	A SEPA threshold Determination of Non-Significance (DNS) was issued September 4, 2015. The appeal period will close September 23, 2015 at 12:00 P.M.
Enabling Procedure:	SMC 17G. 020, Comprehensive Plan Amendment Procedure
Plan Commission Hearing Date:	September 23, 2015
Staff Contact:	Nathan Gwinn, Asst. Planner, 808 W. Spokane Blvd., Spokane, WA 99201, Phone: (509) 625-6893 <a href="mailto:ngwinn@spokanecity.org">ngwinn@spokanecity.org</a>



### **III. FINDINGS OF FACT:**

- A. Site Description: No locations are directly affected by the proposal. The city of Spokane currently contains at least 19 existing mobile or manufactured home parks. Since the amendment concerns preserving existing manufactured home parks, the locations of existing mobile and manufactured home parks provide information about potentially affected locations, but the locations that may be affected by a future designation for manufactured home parks, or for incentives to preserve them, may include fewer or additional areas than the inventory of parks shown in maps submitted with the original application.
- B. Project Description: As authorized by Spokane Municipal Code chapter 17G.020, "Comprehensive Plan Amendment Procedure," the applicant is requesting a comprehensive plan text change to the Comprehensive Plan, Chapter 3, Land Use. The changes would add text authorizing the designation of appropriate areas for preserving mobile and manufactured home parks in Spokane, and supporting discussion (see Section I above).
- C. Existing and Proposed Text: The text would be a policy with all new language in Chapter 3 (Land Use) to support Land Use Goal 1, Citywide Land Use:

LU 1.X 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 house-holds which cannot afford to purchase other types of housing. When existing manufactured home parks are redeveloped many homeowners are unable to move to 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.

- D. Applicable Municipal Code Regulations: SMC 17G.020, Comprehensive Plan Amendment Procedures.
- E. Procedural Requirements:
- Application was submitted on October 31, 2014;
  - Notice of Application was posted and published on March 9, 2015, which began a 60-day public comment period;
  - A SEPA Determination of Nonsignificance was issued September 4, 2015, following the end of the public comment period May 15, 2015;
  - Notice of Plan Commission Public Hearing was posted and mailed by September 9, 2015;
  - Notice of Public Hearing was published in the Spokesman Review on September 9 and 16, 2015;
  - Plan Commission Public Hearing Date is scheduled for September 23, 2015.

### **IV. DEPARTMENT REPORTS and PUBLIC COMMENT**

Notice of this proposal was sent to City departments and outside agencies for their review. No department or agency comments were received.

Written public comment has been received regarding this proposal. As of the date of the staff report, 147 comment letters and emails have been received, with 28 in support of the

proposal, and 109 opposing it, along with several neutral or informational comments.

## **V. CONCLUSIONS:**

SMC 17G.020.030 provides a list of considerations that are to be used, as appropriate, in evaluating a proposal to amend the comprehensive plan. The following is a list of those considerations followed by staff analysis relative to each.

### A. Regulatory Changes.

Amendments to the comprehensive plan must be consistent with any recent state or federal legislative actions, or changes to state or federal regulations, such as changes to the Growth Management Act, or new environmental regulations.

*Relevant facts:* The proposal is being considered and processed in accordance with the most current regulations of the Growth Management Act, the Washington State Environmental Policy Act (SEPA), and the Spokane Municipal Code. There are no known recent state or federal or local legislative actions with which the proposal would be in conflict. Staff concludes this criterion is met.

### B. GMA.

The change must be consistent with the goals and purposes of the state Growth Management Act.

*Relevant facts:* The "Legislative findings" included in the Revised Code of Washington pertaining to GMA is essentially a call for coordinated and planned growth that is done cooperatively between citizens, government, and the private sector. The complete text of the "Legislative findings" follows:

RCW 36.70A.010, Legislative findings.

The legislature finds that uncoordinated and unplanned growth, together with a lack of common goals expressing the public's interest in the conservation and the wise use of our lands, pose a threat to the environment, sustainable economic development, and the health, safety, and high quality of life enjoyed by residents of this state. It is in the public interest that citizens, communities, local governments, and the private sector cooperate and coordinate with one another in comprehensive land use planning.

*The Growth Management Act contains 13 goals to guide the development and adoption of the comprehensive plans and development regulations (RCW 36.70A.020, "Planning Goals"). The two goals that are most related to the land use element state:*

- (1) Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.
- (2) Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.

*Following is an additional GMA goal related to this proposal:*

- (4) Housing. Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.

*The GMA also requires under RCW 36.70A.070(2)(c) that sufficient land be available for all types of housing including manufactured housing. The proposed change would be consistent with these goals and requirements.*

*Staff concludes that this criterion is met.*

C. Financing.

In keeping with the GMA's requirement for plans to be supported by financing commitments, infrastructure implications of approved comprehensive plan amendments must be reflected in the relevant six-year capital improvement plan(s) approved in the same budget cycle.

Relevant facts: *This proposal has been reviewed by city departments responsible for providing public services and facilities. No comments have been made to indicate that this proposal creates issues with public services and facilities. Staff concludes that this criterion is met.*

D. Funding Shortfall.

If funding shortfalls suggest the need to scale back on land use objectives and/or service level standards, those decisions must be made with public input as part of this process for amending the comprehensive plan and capital facilities program.

Relevant facts: *Staff concludes that this criterion is not applicable to this proposal. There are no funding shortfall implications.*

E. Internal Consistency.

The requirement for internal consistency pertains to the comprehensive plan as it relates to all of its supporting documents, such as the development regulations, capital facilities program, shoreline master program, downtown plan, critical area regulations, and any neighborhood planning documents adopted after 2001. In addition, amendments should strive to be consistent with the parks plan, and vice versa. For example, changes to the development regulations must be reflected in consistent adjustments to the goals or policies in the comprehensive plan. As appropriate, changes to the map or text of the comprehensive plan must also result in corresponding adjustments to the zoning map and implementation regulations in the Spokane Municipal Code.

Relevant facts: *The proposal is consistent with all supporting documents of the Comprehensive Plan. The proposed change to the text does not specify that a change to regulations is required. The proposal does not result in the need for other amendments to the comprehensive plan or development regulations. Staff concludes the proposal is consistent with the especially relevant Comprehensive Plan Goals and Policies listed below. See the [full text of the Comprehensive Plan](#) for discussion following most Policies.*

Relevant Comprehensive Plan Goals and Policies

From Chapter 3, Land Use

Goal: LU 1 CITYWIDE LAND USE

*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 the urban center.*

Goal: LU 7 IMPLEMENTATION

*Ensure that the goals and policies of the comprehensive plan are implemented.*

- Policy LU 7.1 Regulatory Structure: *Develop a land use regulatory structure that utilizes creative mechanisms to promote development that provides a public benefit.*

## Goal: LU 8 URBAN GROWTH AREA

Provide an urban growth area that is large enough to accommodate the expected population growth for the next 20 years in a way that meets the requirements of the [countywide planning policies].

- Policy LU 8.1 Population Accommodation: *Accommodate the majority of the county's population and employment in urban growth areas in ways that ensure a balance between livability, preservation of environmental quality, open space retention, varied and affordable housing, high quality cost-efficient urban services, and an orderly transition from county to city jurisdiction.*

## From Chapter 6, Housing

### Vision

"Affordable housing of all types will be available to all community residents in an environment that is safe, clean, and healthy. Renewed emphasis will be placed on preserving existing houses and rehabilitating older neighborhoods."

## Goal: H 1 AFFORDABLE HOUSING

*Provide sufficient housing for the current and future population that is appropriate, safe, and affordable for all income levels.*

- Policy H 1.1 Regional Coordination: *Coordinate the city's comprehensive planning with other jurisdictions in the region to address housing-related needs and issues.*
- Policy H 1.2 Regional Fair Share Housing: *Participate in a process that monitors and adjusts the distribution of low-income housing throughout the region.*
- Policy H 1.5 Housing Information: *Participate in and promote the development of educational resources and programs that assist low and moderate-income households in obtaining affordable and appropriate housing.*
- Policy H 1.7 Socioeconomic Integration: *Promote socioeconomic integration throughout the city.*
- Policy H 1.9 Low-Income Housing Development: *Support and assist the public and private sectors in developing low-income or subsidized housing for households that cannot compete in the market for housing by using federal, state, and local aid.*
- Policy H 1.10 Low-Income Housing Funding Sources: *Support the development of low-income housing development funding sources.*
- Policy H 1.15 New Manufactured Housing: *Permit manufactured homes on individual lots in all areas where residential uses are allowed.*
- Policy H 1.16 Partnerships to Increase Housing Opportunities: *Create partnerships with public and private lending institutions to find solutions that increase opportunities and reduce financial barriers for builders and consumers of affordable lower-income housing.*

## Goal: H 2 HOUSING CHOICE AND DIVERSITY

*Increase the number of housing alternatives within all areas of the city to help meet the changing needs and preferences of a diverse population.*

- Policy H 2.1 Distribution of Housing Options: *Promote a wide range of housing types and housing diversity to meet the needs of the diverse population and ensure that this housing is available throughout the community for people of all income levels and special needs.*

- Policy H 2.7 Taxes and Tax Structure: *Support state consideration of property tax reform measures that provide increased local options that contribute to housing choice and diversity.*

Goal: H 3 HOUSING QUALITY

*Improve the overall quality of the City of Spokane's housing.*

- Policy H 3.2 Property Responsibility and Maintenance: *Assist in and promote improved and increased public and private property maintenance and property responsibility throughout the city.*
- Policy H 3.3 Housing Preservation: *Encourage preservation of viable housing.*
- Policy H 3.5 Housing Goal Monitoring: *Provide a report annually to the City Plan Commission that monitors progress toward achieving the housing goals and includes recommended policy change if positive direction toward achieving the housing goals is not occurring.*

From Chapter 8, Urban Design and Historic Preservation

Goal: DP 6 NEIGHBORHOOD QUALITIES

*Preserve, improve, and support the qualities of individual neighborhood areas.*

- Policy DP 6.2 Access to Housing Choices. *Encourage building and site design that that allows a variety of housing forms while being compatible with the character of the immediate surrounding area, thereby generating community support for development at planned densities.*

From Chapter 10 Social Health

Goal: SH 4 DIVERSITY

*Develop and implement programs that attract and retain city residents from a diverse range of backgrounds and life circumstances so that all people feel welcome and accepted, regardless of their race, religion, color, sex, national origin, marital status, familial status, age, sexual orientation, economic status, or disability.*

- Policy 4.1 Socioeconomic Mix. *Ensure that all neighborhoods contain a mixture of housing types in order to provide an environment that allows for socioeconomic diversity.*

From Chapter 11 Neighborhoods

Goal: N 2 NEIGHBORHOOD DEVELOPMENT

*Reinforce the stability and diversity of the city's neighborhoods in order to attract long-term residents and businesses and to insure the city's residential quality and economic vitality.*

- Policy N 2.4 Neighborhood Improvement. *Encourage rehabilitation and improvement programs to conserve and upgrade existing properties and buildings.*
- Policy N 2.6 Housing Options. *Provide housing options within neighborhoods to attract and retain neighborhood residents, consistent with the neighborhood planning process.*

*Staff concludes that this criterion is met.*

F. Regional Consistency.

All changes to the comprehensive plan must be consistent with the countywide planning policies (CWPP), the comprehensive plans of neighboring jurisdictions,

applicable capital facilities or special district plans, the regional transportation improvement plan, and official population growth forecasts.

*Relevant facts:* Countywide Planning Policy Topic 7, Policy 5 provides for development regulations to facilitate rehabilitation, restoration and relocation of existing structures of affordable housing. The proposal does not conflict with facilities identified in the Citywide Capital Improvement Program.

G. Cumulative Effect.

All amendments must be considered concurrently in order to evaluate their cumulative effect on the comprehensive plan text and map, development regulations, capital facilities program, neighborhood planning documents, adopted environmental policies and other relevant implementation measures.

1. Land Use Impacts.

In addition, applications should be reviewed for their cumulative land use impacts. Where adverse environmental impacts are identified, mitigation requirements may be imposed as a part of the approval action.

2. Grouping.

Proposals for area-wide rezones and/or site-specific land use plan map amendments may be evaluated by geographic sector and/or land use type in order to facilitate the assessment of their cumulative impacts.

*Relevant facts:* The text changes do not impact the land use plan map or development regulations at this time. Implementation of the changes may occur through eventual changes to the land use plan map or development regulations and, if so, will be subject to SEPA review at that time. This application is being reviewed as part of the annual cycle of comprehensive plan amendments.

Staff concludes that this criterion is met.

H. SEPA.

SEPA review must be completed on all amendment proposals.

1. Grouping.

When possible, the SEPA review process should be combined for related land use types or affected geographic sectors in order to better evaluate the proposals' cumulative impacts. This combined review process results in a single threshold determination for those related proposals.

2. DS.

If a determination of significance (DS) is made regarding any proposal, that application will be deferred for further consideration until the next applicable review cycle in order to allow adequate time for generating and processing the required environmental impact statement (EIS).

*Relevant facts:* The application is being reviewed in accordance with the State Environmental Policy Act (SEPA) that requires that the potential for adverse environmental impacts resulting from a proposal be evaluated during the decision-making process. On the basis of information contained with the environmental checklist, the written comments from local and State departments and agencies concerned with land development within the city, and a review of other information available to the Director of Planning and Development, a Determination of Non-Significance (DNS) was issued on September 4, 2015.

I. Adequate Public Facilities.

The amendment must not adversely affect the City's ability to provide the full range of urban public facilities and services (as described in CFU 2.1 and CFU 2.2) citywide at

the planned level of service, or consume public resources otherwise needed to support comprehensive plan implementation strategies.

*Relevant facts: All affected departments and outside agencies providing services on the subject facilities have had an opportunity to comment on the proposal, and no agency or department offered comments suggesting the proposal would affect the City's ability to provide adequate facilities or services or consume public resources otherwise needed to support comprehensive plan implementation strategies. Staff concludes that this criterion is met.*

J. UGA.

Amendments to the urban growth area boundary may only be proposed by the city council or the mayor of Spokane and shall follow the procedures of the countywide planning policies for Spokane County.

*Relevant fact: This criterion is not applicable.*

K. Consistent Amendments.

1. Policy Adjustments.

Proposed policy adjustments that are intended to be consistent with the comprehensive plan should be designed to provide correction or additional guidance so the community's original visions and values can better be achieved. The need for this type of adjustment might be supported by findings from feedback instruments related to monitoring and evaluating the implementation of the comprehensive plan. Examples of such findings could include:

- a. growth and development as envisioned in the plan is occurring faster, slower or is failing to materialize;
- b. the capacity to provide adequate services is diminished or increased;
- c. land availability to meet demand is reduced;
- d. population or employment growth is significantly different than the plan's assumptions;
- e. plan objectives are not being met as specified;
- f. the effect of the plan on land values and affordable housing is contrary to plan goals;
- g. transportation and/or other capital improvements are not being made as expected;
- h. a question of consistency exists between the comprehensive plan and its elements and chapter 36.70A RCW, the countywide planning policies, or development regulations.

*Relevant facts: The proposed amendment to the text of the comprehensive plan is discussed under subsection "E. Internal Consistency" above. Staff concludes that these text changes will better achieve the community's original vision and values through the identification of areas for the preservation of existing housing, that they provide additional guidance, and that they are consistent with the comprehensive plan.*

2. Map Changes.

Changes to the land use plan map (and by extension, the zoning map) may only be approved if the proponent has demonstrated that all of the following are true:

- a. The designation is in conformance with the appropriate location criteria identified in the comprehensive plan (e.g., compatibility with neighboring land uses, proximity to arterials, etc.);
- b. The map amendment or site is suitable for the proposed designation;
- c. The map amendment implements applicable comprehensive plan policies better than the current map designation.

*Relevant fact: This proposal is limited at this time to a text amendment to add a new policy, not a Land Use Plan Map amendment. This criterion is not applicable to this proposal.*

3. Rezones, Land Use Plan Map Amendment.

Corresponding rezones will be adopted concurrently with land use plan map amendments as a legislative action of the city council. If policy language changes have map implications, changes to the land use plan map and zoning map will be made accordingly for all affected sites upon adoption of the new policy language. This is done to ensure that the comprehensive plan remains internally consistent and to preserve consistency between the comprehensive plan and supporting development regulations.

*Relevant fact: This proposal is limited at this time to a text amendment to add a new policy, not a Land Use Plan Map amendment. This criterion is not applicable to this proposal.*

L. Inconsistent Amendments.

1. Review Cycle.

Because of the length of time required for staff review, public comment, and plan commission's in-depth analysis of the applicant's extensive supporting data and long-term trend analysis, proposals that are not consistent with the comprehensive plan are addressed only within the context of the required comprehensive plan update cycle every seven years pursuant to RCW 36.70A.130(4)(C) and every other year starting in 2005.

2. Adequate Documentation of Need for Change.

- a. The burden of proof rests entirely with the applicant to provide convincing evidence that community values, priorities, needs and trends have changed sufficiently to justify a fundamental shift in the comprehensive plan. Results from various measurement systems should be used to demonstrate or document the need to depart from the current version of the comprehensive plan. Relevant information may include:
  - b. growth and development as envisioned in the plan is occurring faster, slower or is failing to materialize;
  - c. the capacity to provide adequate services is diminished or increased;
  - d. land availability to meet demand is reduced;
  - e. population or employment growth is significantly different than the plan's assumptions;
  - f. transportation and/or other capital improvements are not being made as expected;



- g. conditions have changed substantially in the area within which the subject property lies and/or Citywide;
- h. assumptions upon which the plan is based are found to be invalid; or
- i. sufficient change or lack of change in circumstances dictates the need for such consideration.

*Relevant facts:* This year (2015), the Plan Commission may consider proposals that are inconsistent with the comprehensive plan. Usually inconsistent amendments require amendments to the text of the comprehensive plan to achieve consistency with policies of the comprehensive plan. Consistency is discussed under subsections “E. Internal Consistency” and “K. Consistent Amendments” above. In this case, staff concludes that the changes to text amount to a new consistent policy, and do not cause a need to change any existing policy.

3. Overall Consistency.

If significantly inconsistent with the current version of the comprehensive plan, an amendment proposal must also include wording that would realign the relevant parts of the comprehensive plan and its other supporting documents with the full range of changes implied by the proposal.

*Relevant facts:* The proposed application has been determined to be consistent with the comprehensive plan. The criteria listed above are intended to be used to evaluate applications that are inconsistent with the comprehensive plan.

## **VI. CONCLUSION:**

Under [SMC 17G.020.060\(M\)](#), the Plan Commission recommendation is made based “on the review guidelines and required decision criteria, public input, conclusions from any required studies, the staff report, and the SEPA determination.” The code provides that the Plan Commission may recommend (1) approval, (1)(a) approval with modification, or (2) denial based on such factors as insufficient information and that the proposal may be addressed by other means.

Plan Commission members raised several questions during consideration of the amendment proposal. The Plan Commission formed a three-member subcommittee to address the questions. The subcommittee participated in additional workshops with several manufactured home park stakeholders to determine problem areas, gather information, and try to generate consensus by discussing potential alternatives. Staff members worked within the application timeframe to assemble some information, provided in a supplemental background report (dated August 19, 2015).

### **Plan Commission Does Not Have Enough Information and Recommends Denial.**

Following the stakeholder workshops, the subcommittee issued a report (dated August 18, 2015) that anticipated the Plan Commission, following its public hearing, may not be able to reach a recommendation of approval. Instead, it may find that there is still insufficient information to be able to make a decision based on the merits of the proposal and that before adopting the proposed policy, further study should be conducted on manufactured home park demographics and regulations, as well as broader issues related to local affordable housing and Comprehensive Plan goals. These factors are detailed at [SMC 17G.020.060\(M\)\(2\)](#) for recommendations of denial. At this time, many questions remain unanswered; the subcommittee’s recommended housing review study would provide answers and Plan Commission recommendations for action going forward.

**Plan Commission Recommendation of Approval with Modifications.** It is also reasonable to consider a final decision to adopt the proposed policy and that this adoption may not necessarily require a change to the land use plan map. In this case, options for preserving manufactured home parks might still be studied, developed and pursued, such as identification and implementation of existing housing incentive programs, without resulting in changes to any regulations. The Plan Commission may find that existing regulations already designate appropriate locations for preserving manufactured home parks by their allowed use in certain zones. The purpose of limiting the proposal to a text amendment, rather than pursuing a land-use plan map amendment as was originally conceived, was to step back, stimulate community discussion, identify issues, and pursue a strategy. Significant discussion is expected to continue to occur no matter what final decision is made on the application.

If the Plan Commission recognizes the merits of the proposal and decides on approval based on community support and/or that the proposed amendment is consistent with the comprehensive plan and the Spokane Municipal Code criteria for amendments, then staff suggests considering an amendment to the policy discussion that refers to and builds upon the work of the Plan Commission subcommittee and public participation on this proposal. Recommendations for modified approvals are provided at [SMC 17G.020.060\(M\)\(1\)\(a\)](#). The policy discussion text should state:

- A. That any proposed regulations, programs or legislation will be studied by the Plan Commission and considered along with other measures that are likely to further the goals and objectives of the Comprehensive Plan before their adoption, and
- B. That additional work is needed before specific areas are identified.

**Summary of Described Options.** As described above, the Plan Commission may find there is not enough information, and will recommend denial if that is the case. Alternatively, another option discussed would be to recommend approval, and if the Plan Commission decides on this option, then staff suggests an approval recommendation upon modification of the proposal with the added text as described.

**SPOKANE CITY PLAN COMMISSION FINDINGS OF FACT, CONCLUSIONS, AND  
RECOMMENDATION ON THE PROPOSED COMPREHENSIVE PLAN TEXT  
AMENDMENT FOR MOBILE AND MANUFACTURED HOME PARK PRESERVATION  
FILE NO. Z1400065COMP**

**A recommendation from the City Plan Commission to the City Council to deny proposed Comprehensive Plan Amendments to add a new policy, LU 1.X Mobile Home Parks, to the text of Chapter 3, Land Use.**

**FINDINGS OF FACT:**

- A.** The Washington State Legislature passed the Growth Management Act (GMA) in 1990, requiring among other things, the development of a Comprehensive Plan (RCW 36.70A).
- B.** The City of Spokane adopted a Comprehensive Plan in May of 2001 that complies with the requirements of the Growth Management Act.
- C.** Spokane Municipal Code (SMC), Title 17G, Administration and Procedures, chapter 17G.020 Comprehensive Plan Amendment Procedure was used to prepare this proposed amendment to the Comprehensive Plan.
- D.** SMC chapter 17G.020 "Comprehensive Plan Amendment Procedure" identifies terms and conditions for Comprehensive Plan amendments.
- E.** City of Spokane Comprehensive Plan, Land Use Chapter, Goal LU 1, Citywide Land Use states: *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 the urban center.*
- F.** City of Spokane Comprehensive Plan, Land Use Chapter, Goal LU 7, Implementation states: *Ensure that the goals and policies of the comprehensive plan are implemented.*
- G.** City of Spokane Comprehensive Plan, Land Use Chapter, Policy LU 7.1 Regulatory Structure states: *Develop a land use regulatory structure that utilizes creative mechanisms to promote development that provides a public benefit.*
- H.** City of Spokane Comprehensive Plan, Housing Chapter, Goal H 1, Affordable Housing states: *Provide sufficient housing for the current and future population that is appropriate, safe, and affordable for all income levels.*
- I.** City of Spokane Comprehensive Plan, Housing Chapter, Goal H 2, Housing Choice and Diversity states: *Increase the number of housing alternatives within all areas of the city to help meet the changing needs and preferences of a diverse population.*
- J.** City of Spokane Comprehensive Plan, Housing Chapter, Goal H 3, Housing Quality states: *Improve the overall quality of the City of Spokane's housing.*
- K.** City of Spokane Comprehensive Plan, Housing Chapter, Policy H 3.2 Property Responsibility and Maintenance states: *Assist in and promote improved and increased public and private property maintenance and property responsibility throughout the city.*
- L.** City of Spokane Comprehensive Plan, Housing Chapter, Policy H 3.3 Housing Preservation states: *Encourage preservation of viable housing.*

- M. City of Spokane Comprehensive Plan, Housing Chapter, Policy H 3.5 Housing Goal Monitoring states: *Provide a report annually to the City Plan Commission that monitors progress toward achieving the housing goals and includes recommended policy change if positive direction toward achieving the housing goals is not occurring.*
- N. City of Spokane Comprehensive Plan, Urban Design and Historic Preservation Chapter, Goal DP 6 Neighborhood Qualities states: *Preserve, improve, and support the qualities of individual neighborhood areas.*
- O. City of Spokane Comprehensive Plan, Urban Design and Historic Preservation Chapter, Policy DP 6.2 Access to Housing Choices states: *Encourage building and site design that allows a variety of housing forms while being compatible with the character of the immediate surrounding area, thereby generating community support for development at planned densities.*
- P. City of Spokane Comprehensive Plan, Social Health Chapter, Policy SH 4.1 Socioeconomic Mix states: *Ensure that all neighborhoods contain a mixture of housing types in order to provide an environment that allows for socioeconomic diversity.*
- Q. City of Spokane Comprehensive Plan, Neighborhoods Chapter, Policy N 2.4 Neighborhood Improvement states: *Encourage rehabilitation and improvement programs to conserve and upgrade existing properties and buildings.*
- R. Staff requested comments on the Environmental Checklist from City Departments and outside agencies on January 22, 2015. The comment period ended on February 5, 2015. No comments were received from agencies or departments.
- S. Staff presented the proposal to the Community Assembly at its meeting on March 6, 2015.
- T. Notice of the proposed Comprehensive Plan Amendment application and State Environmental Policy Act (SEPA) review was sent to agencies, organizations and neighborhood councils on March 9, 2015. This initiated a 60-day public comment period. Notice was also published in the *The Spokesman Review* on March 9 and 16, 2015 and the *Official Gazette* of the City of Spokane on March 4 and 11, 2015. Comments were provided by interested parties.
- U. The Spokane City Plan Commission held workshops to study the proposed amendment on April 8, July 22 and August 26, 2015.
- V. A Public Open House was held on April 15, 2015, in the Chase Gallery in the Lower Level of City Hall, to receive public feedback and respond to questions about the proposal.
- W. Stakeholder group meetings regarding the text amendment were held on June 17 and July 9, 2015.
- X. A State Environmental Policy Act (SEPA) Determination of Non-Significance was issued on September 4, 2015 relating to this Comprehensive Plan Amendment.
- Y. Announcement of the Plan Commission's September 23, 2015 hearing was published in *The Spokesman Review* on September 9 and 16, 2015. Notice was also provided in the September 9, 2015 issue of the *Official Gazette*.
- Z. On September 14, 2015, the Washington State Department of Commerce and appropriate state agencies were given the required 60-day notice before adoption of proposed changes to the Spokane Comprehensive Plan. An acknowledgement letter from the Department of Commerce was received by the City on September 15, 2015.

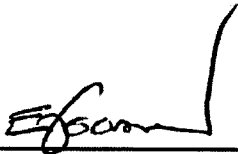
**AA.** The City Plan Commission held a Public Hearing on September 23, 2015 to obtain public comments on the proposed amendments; deliberations followed.

**CONCLUSIONS:**

- A.** The Plan Commission has reviewed all public testimony received during the public hearings.
- B.** The proposed amendments have been reviewed by the City Plan Commission, which believes there is not enough information available to determine the proposal's conformance with the goals and policies of the City's 2001 Comprehensive Plan.
- C.** The City Plan Commission questioned whether the proposal will achieve the desired mix of housing, whether it furthers affordable housing goals, and whether the policy is needed if other factors may be remedied.
- D.** The proposal will be more appropriately and effectively addressed through a complete housing review of existing policies, as recommended by the Plan Commission subcommittee that participated in the stakeholder meetings. The time needed for this review is outside the 2014/2015 comprehensive plan amendment cycle.
- E.** The City Plan Commission recognizes it has been some time since it has been briefed on the progress toward achieving the City's housing goals.
- F.** The City Plan Commission concurs with the subcommittee and believes the proposal may be more appropriately studied as part of the work program in the year 2016, outside the 2014/2015 comprehensive plan amendment cycle.
- G.** For the reasons outlined in the subcommittee's August 18, 2015 attached report, the Plan Commission believes there is not enough information to make a decision on the merits of the proposal at this time and that this proposal would be more appropriately addressed as another part of the Plan Commission's work program.

**RECOMMENDATION:**

By a vote of 5 to 1, the Plan Commission recommends to the City Council the denial of the proposed amendment to the Comprehensive Plan, and that a Plan Commission housing review program be put on the 2016 Plan Commission work program.



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**Evan Verduin, Vice President  
Spokane Plan Commission  
September 23, 2015**

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MEMORANDUM

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DATE: August 18, 2015

TO: City Plan Commission

FROM: Commissioners F.J. Dullanty, Jr., John Dietzman, and Gail Prosser

RE: Plan Commission Subcommittee Report  
for Proposed Comprehensive Plan Text Amendment  
File Z1400065COMP, Mobile and Manufactured Home Park  
Preservation

A subcommittee of the Plan Commission participated in discussions about manufactured home parks with a number of stakeholders that represented both park owners, industry consultants and tenants. The stakeholder group meetings were held June 17, 2015 and July 9, 2015 to provide information to the subcommittee and staff regarding issues surrounding manufactured home parks. This memorandum summarizes the Plan Commission subcommittee's consensus regarding suggested action by the Plan Commission on the proposed text amendment. It was the consensus of the subcommittee that the proposed Amendment Z1400065COMP should be sent to the City Council with a recommendation of denial for these summarized reasons, and for such other reasons the Plan Commission may adopt, if the Plan Commission cannot reach a recommendation of approval.

The subcommittee believes the application materials for the proposed text amendment offer insufficient evidence to support its adoption. The subcommittee feels that there is a lack of information on the relation of manufactured home parks to the promoting of increased densities in centers and corridors as well as affordable housing.

Plan Commission subcommittee members, however, developed an alternative to adopting the proposed Amendment. A Plan Commission workshop on the Mobile and Manufactured Home Park Preservation Amendment is scheduled for August 26, 2015. Following the workshop, staff will request a public hearing on this and the other proposed Comprehensive Plan amendments. The subcommittee asks that the Plan Commission consider the following alternative if the Commission cannot support the Amendment proposal. The Commission should then adopt the alternative into its Findings & Conclusions to be forwarded to the City Council.

**PROPOSED ALTERNATIVE:**

**The Amendment should be denied and a Housing Review of progress toward all housing goals, including manufactured housing, should be conducted.**

The subcommittee believes that the proposed Comp Plan Text Amendment should be denied, and the Plan Commission should conduct a complete Housing Review of existing housing goals and policies, including but not limited to, mobile/manufactured homes and mobile/manufactured home parks. Input to this Review will include City Comprehensive Plan Policy H 3.5, "Housing Goal Monitoring," which outlines instructions for Staff to produce a Monitoring Report that will provide direction to the Plan Commission for recommended policy change if progress toward the City's housing goals is not achieved. The Staff's preliminary report of the status of mobile home parks provides a good start on this effort. This Housing Review would necessitate further study outside the timeframe of the 2015 Comprehensive Plan amendment cycle, so it should be included as part of the Plan Commission's 2016 Work Program.

A component of a complete Housing Review would include review of Development Standards for Mobile Home Parks (17-345.120) both as to site size and current issues in manufactured housing as it may relate to affordable housing, plus policy implementation measures to incentivize the maintenance of current manufactured home parks and the creation of new parks. The current 10 acre minimum parcel size required for a new manufactured home park may actually restrict park development in the City. Revising the SMC Section 17C.345.120 would possibly eliminate the need for new Comp Plan language.

For all types of housing citywide, part of the analysis should include housing needs and housing location plus local job generation related to housing. A complete review would also include citywide options to upgrade housing infrastructure and affordable housing of all types as well as innovations such as current use taxation or utility assessment programs.

**SPOKANE ENVIRONMENTAL ORDINANCE  
NONPROJECT DETERMINATION OF NONSIGNIFICANCE**

**FILE NO(S):** Z1400065COMP – Mobile/Manufactured Home Park Preservation Comprehensive Plan Text Amendment

**PROPONENT:** City of Spokane

**DESCRIPTION OF PROPOSAL:** Amendments to the Spokane Comprehensive Plan Chapter 3, Land Use, are proposed to insert a new policy and accompanying supportive discussion that states:

**LU 1.X 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.

*(Corrections to the attached checklist reflect changes from the original proposal.)*

**LOCATION OF PROPOSAL, INCLUDING STREET ADDRESS, IF ANY:** This proposal is to adopt a text amendment to the City's Comprehensive Plan. This proposal is limited to a community policy and does not directly change the land use category or zoning regulations governing any property.

**LEAD AGENCY:** City of Spokane

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An Environmental Impact Statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.


- There is no comment period for this DNS.
- This DNS is issued after using the optional DNS process in section 197-11-355 WAC. There is no further comment period on the DNS.
- This DNS is issued under 197-11-340(2); the lead agency will not act on this proposal for at least 14 days from the date of issuance (below). Comments must be submitted no later than September 23, 2015 at 12:00 p.m. if they are intended to alter the DNS.

\*\*\*\*\*

**Responsible Official:** Louis Meuler

**Position/Title:** Interim Director, Planning and Development      **Phone:** (509) 625-6300

**Address:** 808 West Spokane Falls Boulevard, Spokane, WA 99201-3329

**Date Issued:** September 4, 2015      **Signature:** 

\*\*\*\*\*

**APPEAL OF THIS DETERMINATION**, after it becomes final, may be made to the City of Spokane Hearing Examiner, 808 West Spokane Falls Blvd., Spokane, WA 99201. The appeal deadline is fourteen (14) calendar days after the signing of the DNS. This appeal must be on forms provided by the Responsible Official, make specific factual objections and be accompanied by the appeal fee. Contact the Responsible Official for assistance with the specifics of a SEPA appeal.

\*\*\*\*\*



## Environmental Checklist

File No. 21400065 COMP

### **Purpose of Checklist:**

The State Environmental Policy Act (SEPA) chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An Environmental Impact Statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

### **Instructions for Applicants:**

This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or give the best description you can.

You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply." Complete answers to the questions now may avoid unnecessary delays later.

Some questions ask about governmental regulations, such as zoning, shoreline, and landmark designations. Answer these questions if you can. If you have problems, the governmental agencies can assist you.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

### **Use of checklist for nonproject proposals:**

Complete this checklist for nonproject proposals, even though questions may be answered "*does not apply*."

IN ADDITION, complete the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (Part D).

For nonproject actions, the references in the checklist to the words "project," "applicant," and "property or site" should be read as "proposal," "proposer," and "affected geographic area," respectively.

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**A. BACKGROUND**

1. Name of proposed project, if applicable: **N/A.**
2. Name of applicant: **Spokane City Council.**
3. Address and phone number of applicant or contact person: **808 W. Spokane Falls Blvd., 509-625-6254.**
4. Date checklist prepared: **11/4/2014.**
5. Agency requesting checklist: **City of Spokane Planning Service**
6. Proposed timing or schedule (including phasing, if applicable): **Proposal would follow Comprehensive Plan Amendment timeline.**
- 7.
- a. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain: **No.**
- b. Do you own or have options on land nearby or adjacent to this proposal? If yes, explain: **No, the applicant does not own any land that this proposal would impact.**
8. List any environmental information you know that has been prepared, or will be prepared, directly related to this proposal: **The applicant is not aware of any environmental information that has been prepared or will need to be prepared for this proposal.**
9. Do you know whether applicants are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain: **No.**
10. List any government approvals or permits that will be needed for your proposal, if known: **City Plan Commission and City Council Approval of Comprehensive Plan Amendment.**
11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page: **Comprehensive Plan Amendment to create a new ~~land use designation and zoning designation~~ for Mobile Home Parks.**

9/2/2015 NG  
Staff Note:  
On 3/5/2015,  
the applicant  
limited the  
proposal to a  
text amendment  
only. No change  
to land use or  
zoning designation  
is proposed.  
The proposed new  
policy states,  
"Designate  
appropriate  
areas for the  
preservation of  
mobile and  
manufactured  
home parks."  
See application  
for full text of  
accompanying  
discussion.

^  
policy ← —

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within city

12. Location of the proposal. Give sufficient information to a person to understand the precise location of your proposed project, including street address, if any, and section, township and range, if known. If a proposal would occur over a range of area, provide the range or boundaries for the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit application related to this checklist: **This is a non-project proposal and is therefore not site specific at the moment** - however, the location of manufactured home parks as of 2012 is noted on attached map.

13. Does the proposed action lie within the Aquifer Sensitive Area (ASA)? The General Sewer Service Area? The Priority Sewer Service Area? The City of Spokane? (See: Spokane County's ASA Overlay Zone Atlas for boundaries): **This is a non-project proposal and is therefore not site specific at the moment; but affected areas lie within the City of Spokane.**

14. The following questions supplement Part A.

a. Critical Aquifer Recharge Area (CARA)/Aquifer Sensitive Area (ASA).

i. Describe any systems, other than those designed for the disposal of sanitary waste, installed for the purpose of discharging fluids below the ground surface (include systems such as those for the disposal of stormwater or drainage from floor drains). Describe the type of system, the amount of material to be disposed of through the system and the types of material likely to be disposed of (including materials which may enter the system inadvertently through spills or as a result of firefighting activities): **This is a non-project action; thus this does not apply.**

ii. Will any chemicals (especially organic solvents or petroleum fuels) be stored in aboveground or underground storage tanks? If so, what types and quantities of material will be stored?: **This is a non-project action; thus this does not apply.**

iii. What protective measures will be taken to insure that leaks or spills of any chemicals stored or used on site will not be allowed to percolate to groundwater. This includes measures to keep chemicals out of disposal systems: **This is a non-project action; thus this does not apply.**

iv. Will any chemicals be stored, handled or used on the site in a location where a spill or leak will drain to surface or groundwater or to a stormwater disposal system discharging to surface or groundwater?: **This is a non-project action; thus this does not apply.**

b. Stormwater

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- i. What are the depths on the site to groundwater and to bedrock (if known)? **This is a non-project action; thus this does not apply.**
- ii. Will stormwater be discharged into the ground? If so, describe any potential impacts: **This is a non-project action; thus this does not apply.**

*TO BE COMPLETED BY APPLICANT*

**B. ENVIRONMENTAL ELEMENTS**

Evaluation for  
Agency Use  
Only

**1. Earth**

- a. General description of the site (circle one): *flat, rolling, hilly, steep, slopes, mountains, other*. **Current mobile home parks exist in a variety of locations that encompass flat, rolling, other, etc.**
- b. What is the steepest slope on the site (approximate percent slope)? **This is a non-project action; thus this does not apply.**
- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and not any prime farmland: **Soil type is varied due to the fact that current mobile parks exist in numerous places in the city.**
- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe: **This is a non-project action; thus this does not apply.**
- e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source to fill: **This is a non-project action; thus this does not apply.**
- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe: **This is a non-project action; thus this does not apply.**
- g. About what percent of the site will be covered with impervious surfaces after project construction (for example,

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asphalt or buildings)?: **This is a non-project action; thus this does not apply.**

Evaluation for  
Agency Use  
Only

- h. Proposed measures to reduce or control erosion or other impacts to the earth, if any: **This is a non-project action; thus this does not apply.**

2. Air

- a. What type of emissions to the air would result from the proposal (i.e., dust automobile, odors, industrial, wood, smoke) during construction and when construction is completed? If any, generally describe and give approximate quantities known: **This is a non-project action; thus this does not apply.**
- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe: **This is a non-project action; thus this does not apply.**
- c. Proposed measures to reduce or control emissions or other impacts to air, if any: **This is a non-project action; thus this does not apply.**

3. Water:

a. SURFACE:

1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal stream, saltwater, lakes, ponds or wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into: **N/A.**
2. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans: **This is a non-project action; thus this does not apply.**
3. Estimate the amount of fill and dredge material that would be placed or removed from the surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material: **This is a non-project action; thus this does not apply.**

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4. Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known: **This is a non-project action; thus this does not apply.**
5. Does the proposal lie within a 100-year floodplain?: **This is a non-project action; thus this does not apply.**
6. Does the proposal involve any discharge of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge: **This is a non-project action; thus this does not apply.**

b. GROUND

1. Will groundwater be withdrawn, or will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known: **This is a non-project action; thus this does not apply.**
2. Describe waste material that will be discharged into the ground from septic tanks or other sanitary waste treatment facility. Describe the general size of the system, the number of houses to be served (if applicable) and or the number of persons the system(s) are expected to serve: **This is a non-project action; thus this does not apply.**

c. WATER RUNOFF (INCLUDING STORMWATER):

1. Describe the source of runoff (including stormwater) and method of collection and disposal if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe: **This is a non-project action; thus this does not apply.**
2. Could waste material enter ground or surface waters? If so, general describe: **This is a non-project action; thus this does not apply.**

- d. PROPOSED MEASURES to reduce or control surface, ground, and runoff water impacts, if any: **This is a non-project action; thus this does not apply.**

4. PLANTS

Evaluation for  
Agency Use  
Only

a. Check or circle type of vegetation found on the site:

\_\_\_\_\_ Deciduous tree: *alder, maple, aspen, other.*

\_\_\_\_\_ Evergreen Tree: *fir, cedar, pine, other.*

\_\_\_\_\_ Shrubs

\_\_\_\_\_ Grass

\_\_\_\_\_ Pasture

\_\_\_\_\_ Crop or grain

\_\_\_\_\_ Wet soil plants: *cattail, buttercup, bulrush, skunk cabbage, other.*

\_\_\_\_\_ Water plants: *water lily, eelgrass, milfoil, other.*

\_\_\_\_\_ Other types of vegetation.

b. What kind and amount of vegetation will be removed or altered?: **This is a non-project action; thus this does not apply.**

c. List threatened or endangered species known to be on or near site: **No known threatened or endangered species on or near site.**

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: **This is a non-project action; thus this does not apply.**

## 5. ANIMALS

a. Circle any birds and animals which have been observed on or near the site that are known to be on or near the site: **Animals and birds on sites vary, but would not be impacted beyond existing impacts due to the fact that this is a non-project action.**

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b. List any threatened or endangered species known to be on or near the site: **No known threatened or endangered species on or near site.**

c. Is the site part of a mitigation route? If so, explain: **Not applicable to this proposal.**

## 6. ENERGY AND NATURAL RESOURCES

a. What kinds of energy (electric, natural gas, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.: **This is a non-project action; thus this does not apply.**

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe: **This is a non-project action; thus this does not apply.**

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any: **This is a non-project action; thus this does not apply.**

## 7. ENVIRONMENTAL HEALTH

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, describe: **This is a non-project action; thus this does not apply.**

1. Describe special emergency service that might be required: **Emergency services already provided for areas under consideration in this proposal.**

2. Proposed measures to reduce or control environmental health hazards, if any: **This is a non-project action; thus this does not apply.**

b. NOISE:



1. What types of noise exist in the area which may be affected by your project (for example: traffic, equipment, operation, other)?:  
**This is a non-project action; thus this does not apply.**

Evaluation for  
Agency Use  
Only

2. What types and levels of noise would be created by or associated with the project on a short-term or long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site: **This is a non-project action; thus this does not apply.**

3. Proposed measure to reduce or control noise impacts, if any:  
**This is a non-project action; thus this does not apply.**

8. LAND AND SHORELINE USE

a. What is the current use of the site and adjacent properties?:  
**Sites under consideration for Comprehensive Plan amendment are current Mobile Home Parks; adjacent sites vary from Residential Single Family homes to General Commercial Businesses.**

On 3/5/2015, the applicant limited the proposal to a text amendment only. No sites are under consideration - 9/2/2015 NG

b. Has the site been used for agriculture?: **No.**

Unknown  
11/24 TMB

c. Describe any structures on the site: **Mobile and/or Manufactured Homes.**

d. Will any structures be demolished? If so, which?: **This is a non-project action; thus this does not apply.**

This is a nonproject action and no properties are being rezoned.  
9/2/2015 NG

e. What is the current zoning classification of the site?: **The current zoning classification of the sites are Residential Single-Family.**

predominately RSF but also RMF and Industrial zoning.  
11/24 TMB

f. What is the current comprehensive plan designation of the site?: **The current Comprehensive Plan designation of the sites are Residential R 4-10.**

other land use designations exist.

g. If applicable, what is the current shoreline master program designation of the site?: **Not applicable to this proposal.**

h. Has any part of the site been classified as a critical area? If so, specify: **No.**

This is a nonproject action and no current comprehensive plan designations would change under this proposal.  
9/2/2015 NG

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Only

- i. Approximately how many people would reside or work in the completed project?: **According to the American Community Survey, there are 1,394 mobile/manufactured homes in the City of Spokane, most of which reside in these mobile home parks. Average household size in the City of Spokane is 2.32. This roughly translates to around 3,234 people who live in Manufactured Homes that would be impacted.**
- j. Approximately how many people would the completed project displace?: **This is a non-project action; thus this does not apply.**
- k. Proposed measures to avoid or reduce displacement impacts, if any: **This is a non-project action; thus this does not apply.**
- l. Proposed measure to ensure the proposal is compatible with existing and projected land uses and plans, if any: **Proposal is consistent with current land use.**

*On 3/5/2015, the applicant limited the proposal to a text amendment only. No sites would be impacted. 9/2/2015 NG*

#### 9. HOUSING

- a. Approximately how many units would be provided, if any? Indicate whether high, middle or low-income housing: **This is a non-project action; thus this does not apply.**
- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle or low-income housing: **This is a non-project action; thus this does not apply.**
- c. Proposed measures to reduce or control housing impacts, if any: **This is a non-project action; thus this does not apply.**

#### 10. AESTHETICS

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?: **This is a non-project action; thus this does not apply.**
- b. What views in the immediate vicinity would be altered or obstructed?: **This is a non-project action; thus this does not apply.**

- c. Proposed measures to reduce or control aesthetic impacts, if any: **This is a non-project action; thus this does not apply.**

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Agency Use  
Only

#### 11. LIGHT AND GLARE

- a. What type of light and glare will the proposal produce? What time of day would it mainly occur?: **This is a non-project action; thus this does not apply.**
- b. Could light or glare from the finished project be a safety hazard or interfere with views?: **This is a non-project action; thus this does not apply.**
- c. What existing off-site sources of light or glare may affect your proposal?: **This is a non-project action; thus this does not apply.**
- d. Proposed measures to reduce or control light and glare, if any: **This is a non-project action; thus this does not apply.**

#### 12. RECREATION

- a. What designated and informal recreational opportunities are in the immediate vicinity?: **Due to the fact that this proposal encompasses multiple Mobile Home Parks, nearby recreational opportunities vary.**
- b. Would the proposed project displace any existing recreational uses? If so, describe: **This is a non-project action; thus this does not apply.**
- c. Proposed measures to reduce or control impacts on recreation opportunities to be provided by the project or applicant, if any: **This is a non-project action; thus this does not apply.**

#### 13. Historic and Cultural Preservation

- a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe: **This is a non-project action; thus this does not apply.**

*unknown but  
this proposal does  
not change  
regulatory protection of  
such sites.*

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*THB*

b. Generally describe any landmarks or evidence of historic archeological, scientific, or cultural importance known to be on or next to the site: **This is a non-project action; thus this does not apply.**

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Only

c. Proposed measures to reduce or control impacts, if any: **This is a non-project action; thus this does not apply.**

#### 14. Transportation

a. Identify public streets and highways serving the site, and describe the proposed access to the existing street system. Show on site plans, if any: **Due to the fact that this proposal encompasses multiple Mobile Home Parks, public streets and highways to affected sites vary.**

b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?: **All affected sites are currently within reasonable proximity to public transit.**

c. How many parking spaces would the completed project have? How many would the project eliminate?: **This is a non-project action; thus this does not apply.**

d. Will the proposal require any new roads or streets, or improvements to existing roads and streets not including driveways? If so, general describe (indicate whether public or private): **This is a non-project action; thus this does not apply.**

e. Will the project use (or occur in the immediate vicinity of) water, rail or air transportation? If so, generally describe: **This is a non-project action; thus this does not apply.**

f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak would occur: **This is a non-project action; thus this does not apply.**

g. Proposed measures to reduce or control transportation impacts, if any: **This is a non-project action; thus this does not apply.**

#### 15. Public Services

← On 3/5/2015, the applicant limited the proposal to a text amendment only.  
← No sites are encompassed or affected.  
9/2/2015 NG

Evaluation for  
Agency Use  
Only

- a. Would the project result in an increased need for public service (for example: fire protection, police protection, health care, schools, other)? If so, generally describe: **No. Mobile home parks under consideration already receive public services.**
- b. Proposed measures to reduce or control direct impacts on public services, if any: **No measures necessary for this proposal.**

16. Utilities

- a. Circle utilities currently available at the site: *electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.*
- b. Describe the utilities that are proposed for the project, the utility providing the service and the general construction activities on the site or in the immediate vicinity which might be needed: **Utilities already utilized at mobile homes on sites.**

**C. SIGNATURE**

I, the undersigned, swear under penalty of perjury that the above responses are made truthfully and to the best of my knowledge. I also understand that, should there be any willful misrepresentation or willful lack of full disclosure on my part, the agency must withdraw any determination of Nonsignificance that it might issue in reliance upon this checklist.

Date: 11-20-14 Signature: [Signature]

**Please Print or Type:**

Proponent: Jon Snyder Address: 808 W. Spokane

Phone: 509-625-6254 Falls Blvd.

Person completing form (if different from proponent):

Blaine Stum Address: 808 W. Spokane

Phone: 509-879-3943 Falls Blvd.

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Staff member(s) reviewing checklist: \_\_\_\_\_

Based on this staff review of the environmental checklist and other pertinent information, the staff concludes that:

- A. there are no probable significant adverse impacts and recommends a Determination of Nonsignificance.
- B. probable significant adverse environmental impacts do exist for the current proposal and recommends a Mitigated Determination of Nonsignificance with conditions.
- C. there are probable significant adverse environmental impacts and recommends a Determination of Significance.

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**D. SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS**  
**(Do not use this sheet for project actions)**

Because these questions are very general, it may be helpful to read them in conjunction with the list of elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water, emissions to air, production, storage or release of toxic or hazardous substances; or production of noise?: **The Comprehensive Plan amendment would protect current land uses while changing the land use designation and zoning; as such, it would not increase any of the negative environmental impacts listed above.**

Staff Note:  
- On 3/5/2015, the applicant limited the proposal to a text amendment.

Proposed measures to avoid or reduce such increases are: **No proposed measures necessary for this action.**

2. How would the proposal be likely to affect plants, animals, fish or marine life: **The Comprehensive Plan Amendment would protect current land uses while changing the land use designation and zoning; as such it would not change current impacts on plants, animals, fish or marine life that the Mobile Home Park sites already have on site or in adjacent areas.**

No changes to land use designations or zoning.  
9/2/2015 NG

Proposed measures to protect or conserve plants, animal's fish or marine life are: **No proposed measures necessary for this action.**

3. How would the proposal be likely to deplete energy or natural resources?: **The Comprehensive Plan amendment would protect current land uses while changing the land use designation and zoning; as such the impact on energy and natural resources would not change from current observed impacts.**

- No change to land use designation or zoning.  
9/2/2015 NG

Proposed measures to protect or conserve energy or natural resources are: **No proposed measures necessary for this action.**

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered special habitat, historic or cultural sites,, wetlands, flood plains or prime farmlands?: **The Comprehensive Plan Amendment would protect current land uses while changing the land use designation and zoning; as such it is not estimated to have any more impact on the items listed above beyond the impact existing Mobile Home Parks may have already had.**

- No change to land use designation or zoning.  
9/2/2015 NG

Proposed measures to protect such resources or to avoid or reduce impacts are: **No proposed measures necessary for this action.**

Staff Note:  
On 3/5/2015  
the applicant  
limited the  
proposal to a  
text amendment.

5. How would this proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?: **The Comprehensive Plan Amendment would protect current land uses while changing the land use designation and zoning; as such impacts to land use would remain the same as current impacts unless a proposed project to redevelop the land was approved via a Comprehensive Plan Amendment.**

No change to  
land use designation  
or zoning.

deleted  
as out  
of  
scope.  
THB

Proposed measures to avoid or reduce shoreline and land use impacts are: **No proposed measures necessary for this action.**

6. How would the proposal be likely to increase demand on transportation or public services?: **The Comprehensive Plan Amendment would protect current land uses while changing the land use designation and zoning; as such it will not increase demand on transportation or public services beyond what demand already exists.**

No change  
to land use  
designation  
or zoning.  
9/2/2015 NG

Proposed measures to reduce or respond to such demand(s) are: **No proposed measures necessary for this action.**

7. Identify, if possible, whether the proposal may conflict with local, state or federal laws, or requirements for the protection of the environment: **To the knowledge of the applicant, this proposal does not violate any local, state or federal laws, and does not violate any requirements for the protection of the environment.**



C. SIGNATURE

I, the undersigned, swear under penalty of perjury that the above responses are made truthfully and to the best of my knowledge. I also understand that, should there be any willful misrepresentation or willful lack of full disclosure on my part, the agency may withdraw any Determination of Nonsignificance that it might issue in reliance upon this checklist.

Date: 11-20-14 Signature: \_\_\_\_\_

**Please Print or Type:**

Proponent: Jon Snyder Address: 808 W. Spokane

Phone: 509-625-6254 Falls Blvd.

Person completing form (if different from proponent): Blaine Stum

Address: 808 W. Spokane

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**FOR STAFF USE ONLY**

Staff member(s) reviewing checklist: \_\_\_\_\_

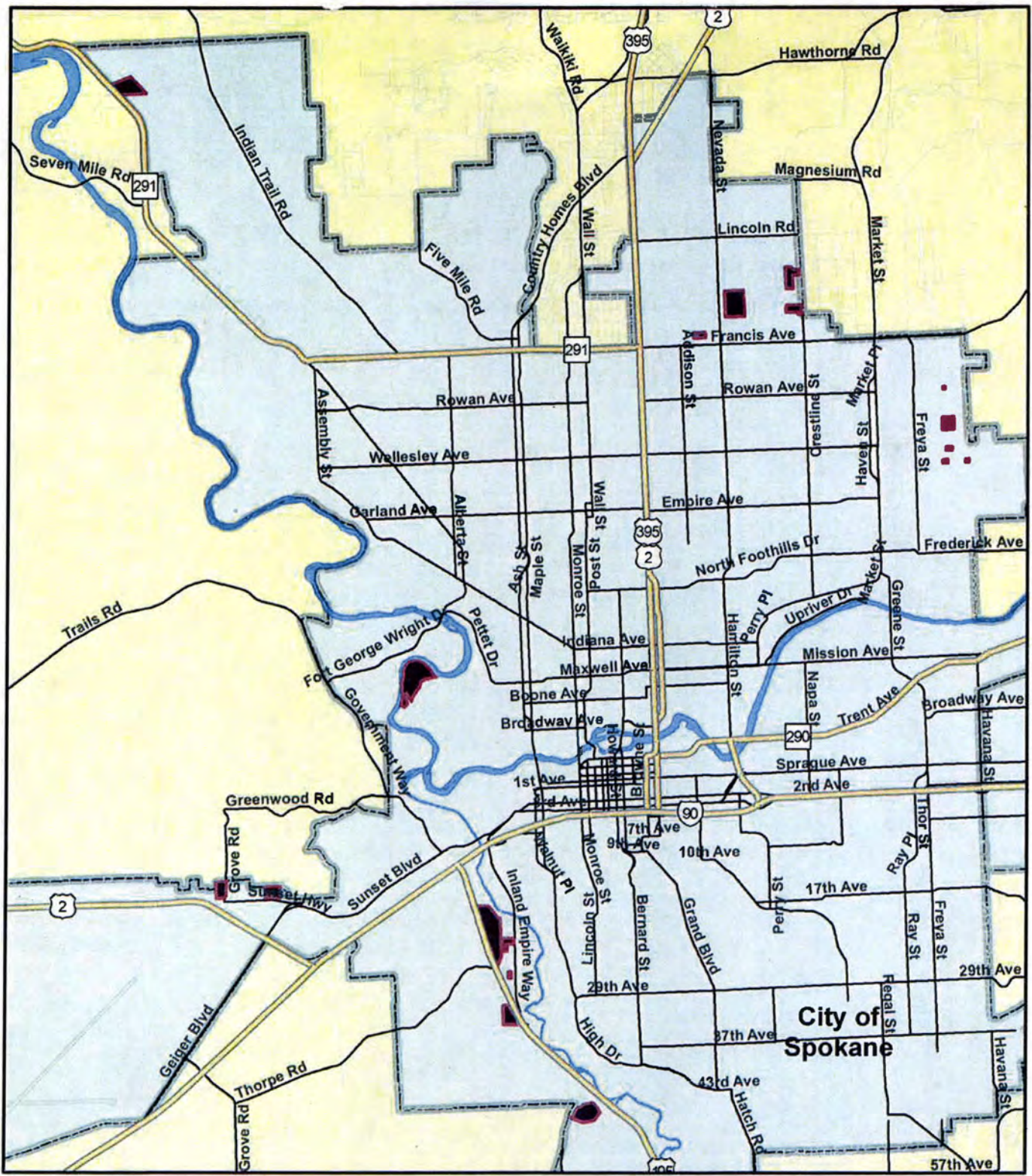
Based on this staff review of the environmental checklist and other pertinent information, the staff concludes that:

- A.  there are no probable significant adverse impacts and recommends a Determination of Nonsignificance.
- B.  probable significant adverse impacts do exist for the current proposal and recommends a Mitigated Determination of Nonsignificance with conditions.
- C.  there are probable significant adverse environmental impacts and recommends a Determination of Significance.





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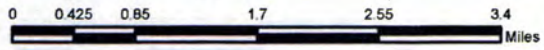
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**Legend**

-  Manufactured Home Park
-  Municipal Boundary
-  Highway
-  River



**City of  
Spokane**



ORD C35310

Due to the size of the public comments they can be viewed at the following link:

<https://static.spokanecity.org/documents/projects/mobilehomeparks/2015-10-29-comments-recd-to-date-manuf-home-park-preserve.pdf>

The pages below have a summary listing of the comments received as of October 6, 2015.

Z1400065COMP – Manufactured Home Park Preservation Comprehensive Plan Amendment Application  
 Summary of Public Comment Received – Arranged by Date Received  
 October 6, 2015

**Viewing Full Public Comment Online**

Full public comment is public record and a part of the official file. Comments received may be viewed online under “related documents” at the application webpage:

<http://my.spokanecity.org/projects/policy-re-manufactured-and-mobile-home-parks/>

**Comment Summary and Explanation of Response**

Twenty-nine comments were generally supportive of the comprehensive plan amendment proposal, while 110 comments were generally opposed. Several comments were neutral. Some individuals submitted more than one comment. The Plan Commission and staff responded to the comments by convening a stakeholder group to share information about the proposed policy and develop alternative language. Participating Plan Commission members formed a subcommittee to study alternatives and ultimately the Plan Commission recommended denial of the application, and further recommended a Plan Commission housing review for the upcoming 2016 work program.

Below is a list of comments received and a general summary for each:

Date Rec'd	Comment From	General
4/3/2015	Cochran, Robert	Oppose
4/6/2015	Cochran, Robert	Informational
4/6/2015	White, Judith	Support
4/7/2015	Chapman, Randy	Informational
4/8/2015	Cochran, Robert	Informational
4/9/2015	Chapman, Randy	Informational
4/9/2015	Chapman, Randy	Informational
4/14/2015	Chapman, Randy	Informational
4/14/2015	Chapman, Randy	Informational
4/15/2015	Kendrick, Frances	Support
4/15/2015	Morin, Janet	Support
4/15/2015	Smith, Allison	Support
4/15/2015	Mansfield, Jere	Support
4/26/2015	Gerber, Sanford	Support
4/30/2015	Whittekiend, Pam	Support
4/30/2015	Roberts, Cheryl	Support
5/6/2015	Jessup, Sue	Support
5/11/2015	Walters, Winnifred	Support
5/6/2015	Mason, Vicki	Support
5/6/2015	Toone, Janet	Support
5/10/2015	Doyle, Sharon	Support
5/11/2015	Suhr, Adolph	Support
5/12/2015	Marlowe, William	Support
5/13/2015	Spencer, Ken	Oppose
5/13/2015	Bailey, Brenda	Support
5/14/2015	Chapman, Randy	Support
5/14/2015	Cochran, Robert	Oppose
5/14/2015	Doyle, Carolyn	Support
5/14/2015	Stolz, Brian	Support
5/14/2015	Doyle, Sharon	Support

Date Rec'd	Comment From	General
5/14/2015	Sperber, Ron	Support
5/15/2015	Oyler, Jon	Support
5/15/2015	Powell, Nan	Support
5/15/2015	Smith, Nathan	Oppose
5/15/2015	Schwartz, Stanley	Oppose
5/15/2015	Dickens, Ishbel	Support
5/15/2015	Bishop, Sharon	Support
5/18/2015	Beaman, Delores G.	Support
5/18/2015	Pearson, Sandra	Support
7/9/2015	Dickens, Ishbel	Informational
7/14/2015	Cochran, Robert	Oppose
7/14/2015	Dickens, Ishbel	Support
7/21/2015	Smith, Nathan	Oppose
7/27/2015	Chapman, Randy	Informational
7/30/2015	Chapman, Randy	Informational
8/13/2015	Pappenheim, D.W.	Oppose
8/13/2015	Breza, Robert	Oppose
8/13/2015	Rodgers, Ronald	Oppose
8/13/2015	Kimberling, Kurt	Oppose
8/13/2015	MACQUARRIE, HARVEY	Oppose
8/13/2015	Wetmore, David	Oppose
8/13/2015	Bothman, Bruce	Oppose
8/13/2015	Pasteur, John	Oppose
8/13/2015	Dawe, Richard	Oppose
8/13/2015	Sterzelbach, Kurt	Oppose
8/13/2015	Lish, Mike	Oppose
8/13/2015	Chamberlin, David	Oppose
8/13/2015	Faulkner, Robert	Oppose
8/13/2015	Willey, Bill	Oppose
8/13/2015	Valentine, Robert	Oppose

Date Rec'd	Comment From	General
8/13/2015	Valentine, Barbara	Oppose
8/13/2015	Bech, James	Oppose
8/13/2015	Jeanneret, William	Oppose
8/13/2015	Berdal, James	Oppose
8/13/2015	Anderson, Frederic	Oppose
8/13/2015	Stewart, Jim	Oppose
8/14/2015	Campanella, David	Oppose
8/14/2015	Redeye, Thomas	Oppose
8/14/2015	Waterhouse, Gary	Oppose
8/14/2015	Vosecky, Reba	Oppose
8/14/2015	Cook, Duane	Oppose
8/14/2015	Bowe, Bright	Oppose
8/14/2015	Bowe, Bright	Oppose
8/14/2015	Buchanan, Merlin	Oppose
8/14/2015	Combs, Jerry	Oppose
8/15/2015	Brockstruck, James	Oppose
8/15/2015	Stark, Thomas	Oppose
8/15/2015	Conetto, Al	Oppose
8/15/2015	Kerber, Richard	Oppose
8/16/2015	Heebink, Jim	Oppose
8/16/2015	Felton, Tom	Oppose
8/16/2015	Martin, Dan	Oppose
8/17/2015	Toll, Ted	Oppose
8/17/2015	Gehrig, Roger	Oppose
8/17/2015	Manson, George	Oppose
8/17/2015	Richardson, Tom	Oppose
8/18/2015	Hall, Charles D.	Oppose
8/20/2015	Pasteur, Cynthia	Oppose
8/20/2015	Ball, Jasmes	Oppose
8/25/2015	Van Dyke, Gary	Oppose
8/25/2015	Roberts, Charles	Oppose
8/25/2015	Rodgers, Ronald	Oppose
8/25/2015	Morgan, Sean	Oppose
8/25/2015	Berg, Kim	Oppose
8/25/2015	Wilson, William	Oppose
8/25/2015	Williams, James A.	Oppose
8/25/2015	Johnston, Marc	Oppose
8/25/2015	Iverson, Merle	Oppose
8/25/2015	Brockman, Bob	Oppose
8/25/2015	Tellessen, Dave	Oppose
8/25/2015	Tellessen, Kathy	Oppose
8/25/2015	Flodin, Jason	Oppose
8/25/2015	Jones, Barry K.	Oppose
8/25/2015	Flynn, Stacy	Oppose

Date Rec'd	Comment From	General
8/25/2015	Flynn, Stacy	Oppose
8/25/2015	Neil, Melvin	Oppose
8/25/2015	Sijohn, Anthony	Oppose
8/26/2015	Woltersdorf, Leonard	Oppose
8/26/2015	Gendreau, Jerry	Oppose
8/26/2015	Valentine, Robert	Oppose
8/26/2015	Felton, Tom	Oppose
8/27/2015	Rutledge, Ed	Oppose
8/27/2015	Wiess, John A.	Oppose
8/29/2015	Ball, Sharon	Oppose
9/4/2015	Smith, Jay A.	Oppose
9/8/2015	Hearn, Dale	Oppose
9/8/2015	Oty, Brent	Oppose
9/8/2015	Miranda, Ernest	Oppose
9/8/2015	Sayre, Richard	Oppose
9/8/2015	Kalk, Gail	Oppose
9/8/2015	Kruse, Ben	Oppose
9/8/2015	Lind, Jon	Oppose
9/8/2015	Green, Ronald R.	Oppose
9/8/2015	Neil, Melvin	Oppose
9/8/2015	Black, Don	Oppose
9/8/2015	Young, Charles	Oppose
9/8/2015	Lindgren, Robert	Oppose
9/8/2015	Easley, David	Oppose
9/8/2015	Anderson, Frederic	Oppose
9/8/2015	Pew, Jesse	Oppose
9/8/2015	Black, Steve R.	Oppose
9/8/2015	Campanella, David	Oppose
9/8/2015	Harper, Mike	Oppose
9/8/2015	Schieche, Jerry	Oppose
9/8/2015	Hartwell, Susanne	Oppose
9/9/2015	Robertson, John	Oppose
9/9/2015	Gray, Linda	Oppose
9/9/2015	Eberly, Bill	Oppose
9/9/2015	Thompson, Gabe	Oppose
9/9/2015	Eberly, Judith A.	Oppose
9/9/2015	Harp, Jerry	Oppose
9/10/2015	Swannack, David L.	Oppose
9/10/2015	Kimberling, Elaine	Oppose
9/11/2015	Postlewait, Herb	Oppose
9/11/2015	Postlewait, Herb	Oppose
9/11/2015	Valentine, Robert	Oppose
9/14/2015	Kirkpatrick, James	Oppose
9/22/2015	Bailey, Brenda	Support
9/23/2015	Schwartz, Stanley	Oppose

If there are issues accessing the comments online at the link on page 1 above, then please contact Nathan Gwinn, [ngwinn@spokanecity.org](mailto:ngwinn@spokanecity.org) or 509-625-6893 to see entire public comments.