



August 3rd, 2016

To: City of Spokane Plan Commission

Cc: Lisa Key and Tirrell Black, City of Spokane Planning Department

RE: z1500084 COMP, Morningside Investments LLC (Windhaven)

The North Indian Trail Neighborhood Leaders would like to respond on behalf of the Neighborhood Council Membership to the "additional information" submitted by the applicant to the Plan Commission. We believe that there are inconsistencies with previous information, assumptions and other items that need to be addressed.

There are also two items from the meeting notes from the meetings of the developer with city staff.

From the additional information (bolding added):

From p6

In accordance with zoning regulations and comprehensive plan planning goals, there should be a minimum of at least 1,178 multi-family units and a maximum of 2,422 multi-family units located on these properties. Note, the maximum could actually be higher due to no limits placed on the O-35 and CC2-NC properties. **It is reasonable to assume that the original planning group planned for densities in accordance with Table LU 2 of the Comprehensive Plan (See Appendix I)**

Response: There is no basis for this "assumption" as a justification for the current proposal. The planning group, (PG), was charged with "cleaning up" zoning and land use designations which did involve some "up-zoning", most notably for the properties now occupied by the Selkirk apts. The PG was fully aware that the multi-family zone to the west of the NC was already built out to low density and that the Prince of Peace Church and the fire station occupied the zone to the south.

There was no discussion or suggestion by anyone, including Cliff Cameron, who represented the Douglass interests, of adding any additional R 15-30 zoning.

The densities the PG planned for are those in the current sub-area plan.

Furthermore, maintenance of the predominantly single-family character of our neighborhood has long been our goal. The following excerpts are from the neighborhood planning effort ending in 2006. Note the reference to "limited multi-family housing" in the last sentence of the second excerpt:

MASTER GOAL STATEMENT

Ensure a full array of urban services, facilities, housing and amenities, while maintaining the character of single family homes, as the North Indian Trail (NIT) area transitions from a suburban to urban community.

LAND USE AND DEVELOPMENT

The North Indian Trail area has been primarily a single family residential community, with typical supportive services such as a school, churches and shopping facilities. Existing housing is typified by large homes on large lots. Newer housing developments include higher density with smaller homes on smaller lots, Planned Unit Developments, and other multi-family options which range from duplexes to apartments. This plan suggests appropriate locations where limited multi-family housing might be provided to help increase housing choices.

Also from pg6:

This proposal intends to provide 750 **affordable living units** on 49.5 acres at the perimeter of the neighborhood center. At full buildout of all the available multi-family properties around the perimeter including the subject property, the resulting overall multi-family density would increase from the existing 10.5 units per acre to approximately 12.3 units per acre, still below the envisioned 15-22 units per acre as anticipated by comprehensive plan.

Response:

The developer has repeatedly stated in meetings with the neighborhood that these would be “mid to high income” rental units.

Information from City-data.com and Forrent.com is that rent ranges for the 3 existing apartment complexes in NIT are:

Lusitano:	\$695 to \$1255 (Note: Lusitano qualified for the MFTE program when built)
Selkirk:	\$830 to \$1530
Jake (Homestead):	\$870 to \$1510

For reference, the rent for Lusitano apartments was stated as being 21% above the Spokane average.

The chart on the following page provides information from 2016. It is clear that the existing Indian Trail apartment complexes charge rents that are well above average for Spokane. The question to ask of the developer is: What does “affordable living units” mean?

Spokane Apartment Market Survey

Spring 2016

North Spokane

Unit Type	Pct. Vacant	Avg. Rent(\$)	Rent/SqFt(\$)	Units Surveyed	Complexes
1 Bedroom	1.5	548	0.80	271	9
2 Bedroom/1 Bath	3.0	618	0.82	197	7
2 Bedroom/2 Bath	2.1	693	0.64	242	5
3 Bedroom/2 Bath	1.9	741	0.60	52	3
Other	0.0	601	NA	29	2
All	2.0	627	0.71	791	11

Central Spokane

Unit Type	Pct. Vacant	Avg. Rent(\$)	Rent/SqFt(\$)	Units Surveyed	Complexes
Studio	4.7	422	0.77	171	3
1 Bedroom	5.3	464	0.74	303	8
2 Bedroom/1 Bath	7.0	621	0.78	258	6
2 Bedroom/2 Bath	3.3	872	0.67	60	2
3 Bedroom/1 Bath	NA	NA	NA	NA	1
Other	NA	NA	NA	NA	1
All	5.6	554	0.79	802	8

Still from p6

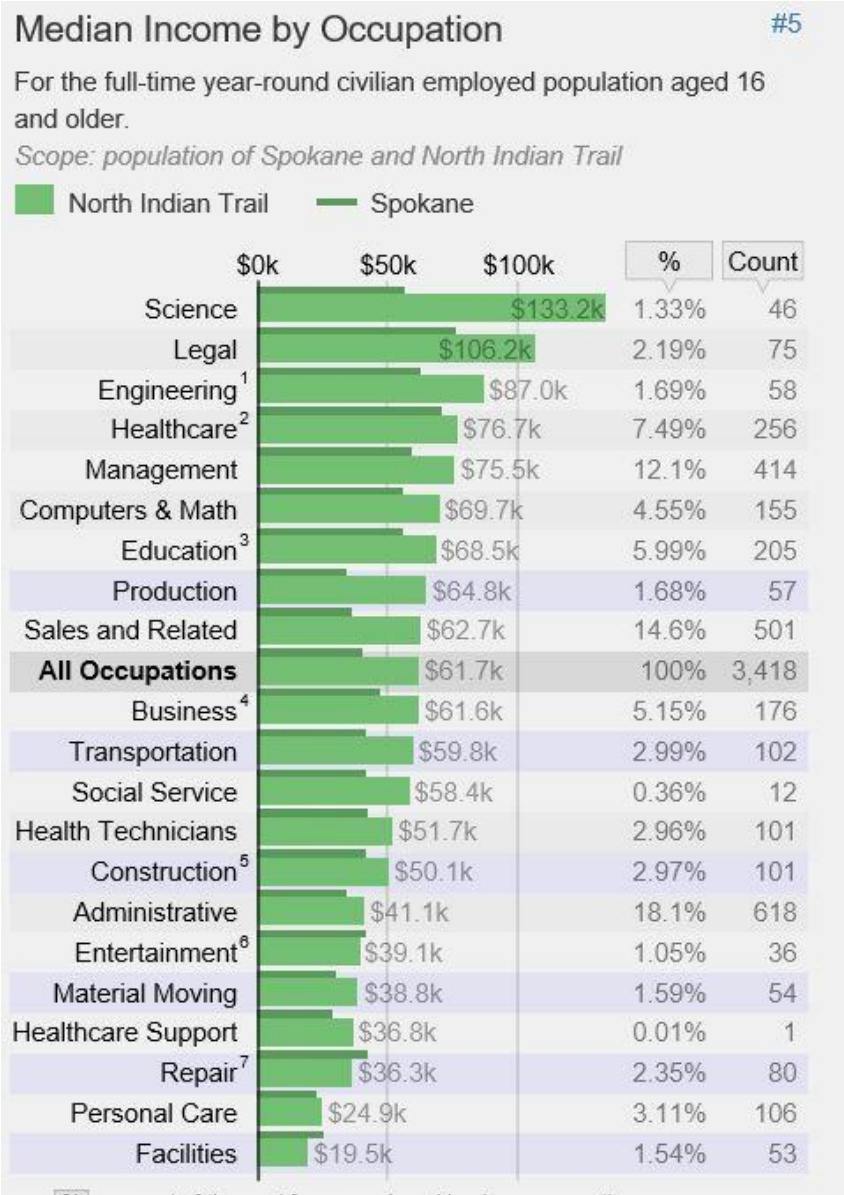
The increased population from the additional living units would help support the Neighborhood Center and would have a positive influence on increasing investment and tax revenues as deemed necessary by the Comprehensive Plan **to attract higher incomes to the neighborhood.**

Response: The neighborhood as long attracted higher incomes, largely because of the lack of high density developments. For example, from information on City-data.com:

Median household income in 2013:

North Indian Trail:	\$83,589
Spokane:	\$39,385

Additionally the following chart is from the Indian Trail Neighborhood Assessment report dated 3/28/2005:



From p8-9

Goal (11) Citizen Participation – **The North Indian Trail Neighborhood Council is purposed to improve and preserve the quality of life in North Indian Trail Neighborhood.** To that end, they were involved in the planning process of the Neighborhood Center and other surrounding land use designations of the comprehensive plan.

Response:

Our opposition to the proposed amendment is based on our desire to “preserve the quality of life” which is so important to our neighborhood.

Since many of the properties with high-density housing designations were developed with no residential units or lesser density than allowed, the neighborhood should be in favor of this development to supplement lost residential opportunities near the core of the Center that is essential for its economic health.

Response:

We find it incomprehensible that the developer continues to assert that we should want this zone change. The neighborhood has consistently expressed the desire to maintain its predominantly single-family residential character as shown by the neighborhood planning effort of 2003-2006, (which recommended down-zoning the Hunt's Pointe parcels on the east side of ITR from multi-family to single family), the sub-area plan adopted in 2007, the attendance at the 3 neighborhood meetings related to the proposal and the volume of comments submitted.

From p15

Parks and Open Spaces. Discussion: The subject property is located within walking distance of an established 5-acre city park – Pacific Park, and public school playgrounds at Woodridge Elementary school. In addition, the subject site is located approximately one mile from 14-acre Meadowglen Park and 16-acre Meadowglen Conservation area. **Sundance Golf Course, The Spokane River, and Riverside State Park are also nearby.**

Response:

The developer seems to be trying to justify the very minimal green space both within the proposed development and within the neighborhood. The golf course is approximately 6.5 miles away and the river and park are similarly distant, so listing them seems completely irrelevant.

The chart on the next page is from the Neighborhood Assessment done in 2006 and shows the inadequacy of park space in our neighborhood. No additional park space has been acquired since the assessment. Pacific Park at 4.85 acres is the only developed park. We are not aware of any plan to develop Meadowglen Park and don't foresee any inclination on the part of the Parks Dept. to expend scarce funds on a park at the far northwest edge of the city.

Note that the population base for the LOS determination was 6212. Updating for population as of 2010 would drop the LOS from 3.08 to 2.69, adding likely population growth from 2010 and estimating at least 600 residents added by the Crapo development in progress would drop it to 2.4. If this amendment is approved, some 1500 more residents would bring the LOS to about 2.0.

The Meadowglen Conservation area is not considered as it is not a city park

NOTE: Easy access to green space is of great importance to the health and well-being of residents. The following URL will take you to Sciencedaily.com where you will find many references to research showing the importance of green space.

<https://www.sciencedaily.com/search/?keyword=green+space+and+health#gsc.tab=0&gsc.q=green%20space%20and%20health&gsc.page=1>

Parks and Open Space

Every community requires a variety of areas and facilities for meeting the recreational and leisure time pursuits of its residents and visitors. Parks, open space, and natural environments are essential components of a healthy community and contribute immeasurably to Spokane's quality of life. Spokane Countywide Planning policies and the City of Spokane Comprehensive Plan policies address parks and open space requirements within Urban Growth Areas.

As the City's population grows over time and the land becomes more and more developed it becomes increasingly difficult to acquire lands and support existing and additional parks and open space with available funding. This is a challenge the Parks and Recreation Department is well aware.

Table P&O 2 shows the types of parks available per thousand residents in the North Indian Trail Neighborhood and citywide. This neighborhood has neighborhood parks only. North Indian Trail does have a designated conservation area, but this category is not used in calculating level of service for parks.

The city measures Level of Service (LOS) by comparing the acres of parks per every thousand residents. The breakdown of LOS per thousand residents is shown in Table P&O3. The total LOS for parks is totaled to 5.28 parks per thousand residents. Conservation land is not included in LOS calculations. The National Recreation and Parks Association (NRPA) has established a standard LOS of 11.25 acres per thousand residents. Table P&O 1 compares the LOS of the NRPA, the City of Spokane, and the North Indian Trail Neighborhood.

NRPA	City of Spokane	North Indian Trail Neighborhood
11.25	5.28	3.08

Table P&O 1

The LOS was obtained from the City of Spokane Comprehensive Plan and is verified in the Parks, Recreation, and Open Spaces Plan adopted April 28, 2000.

Park Name	Type of Park	Acres of Park
Meadowglen Conservation Area	Conservation Land	15.96
Meadowglen Park	Neighborhood Parks	14.30
Pacific Park	Neighborhood Parks	4.85

Table P&O 2

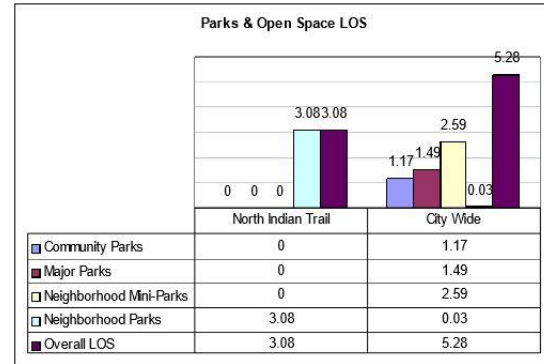


Table P&O 3

From P18

It has been suggested by the North Indian Trail Neighborhood Council, Five Mile Prairie Neighborhood Association and others that approval of this amendment would be in violation of the sub-area plan that was adopted for the Indian Trail center by the passing of ordinance C34154, **when in fact quite the opposite is true. This amendment supports the spirit of the envisioned plan** by providing supplemental multi-family housing at the center that never materialized on the properties that were designated for such housing. Furthermore, this amendment should be approved because:

1. The proposed multi-family designation conforms to appropriate location criteria; 2. The site is suitable for the multi-family designation; **3. This amendment implements applicable comprehensive plan policies better than the current single-family designation.**

Response:

As stated before, the adopted sub-area plan reflected the wishes of the neighborhood. There was no other "envisioned plan".

As to the suitability of the site, super-imposing a 45 building apartment complex over a site with built utilities, streets and sidewalks designed for single-family housing seems highly questionable.

Furthermore, the proposed amendment conflicts with the following excerpt from the comp plan. Note the bolding added to the text referencing neighborhood centers and the text discussing the allowable housing types.

LU 1.1 Neighborhoods

Utilize the neighborhood concept as a unit of design for planning housing, transportation, services, and amenities.

Discussion: Neighborhoods should have identifiable physical boundaries, such as principal arterial streets or other major natural or built features. Ideally, they should have a geographical area of approximately one square mile and a population of around 3,000 to 8,000 people.

Many neighborhoods have a neighborhood center that is designated on the land use plan map.

The neighborhood center, containing a mix of uses, is the most intensive activity area of the neighborhood. It includes higher density housing mixed with neighborhood-serving retail uses, transit stops, office space, and public or semi-public activities, such as parks, government buildings and schools.

A variety of compatible housing types are allowed in a neighborhood. The housing assortment should include higher density residences developed in the form of small scale apartments, town houses, duplexes, and rental units that are accessory to single-family homes, as well as detached single-family homes.

The sub-area plan resulted in RMF zoning that is consistent with the LU 1.1 specification of small scale apartments. R 15-30 zoning was assigned to 5 relatively small parcels with sizes and shapes suitable only for such apartments.

The proposed complex is anything but “small scale”. The proposed density per acre occupied by the complex would be one of the highest, if not the highest in any neighborhood in Spokane. Looking at satellite imagery of all of Spokane, there are no other complexes with so many buildings per acre. 640 divided by 50 X 1500 (@2 persons per unit) equals some 19,200 persons per square mile. For comparison, the Lusitano and Selkirk complexes combined equal 10, 418 persons per square mile.

From the 4/14 developer meeting with Planning:

- Decision criteria in SMC 17G.020.030 were discussed. Mr. Douglass argued that the application had met the requirements and that he shouldn't be held to the opinion of the neighborhood.

Response:

The dismissive attitude displayed by this comment about our “opinion” is troubling to say the least. Our understanding is that city policy is neighborhood residents and other members of the neighborhood's council are to have a voice in how that neighborhood is developed and that their comments are valued. Our neighborhood council has repeatedly stated that we support development that respects the neighborhood character.

- Lisa asked if the applicant would consider phasing

- Applicant reluctant as the requirements “keep changing”, and he claims that he is losing the value of “two lots per year” in property taxes, because they are assessed as individual, single- family lots

Response:

The applicant’s answer was directly contradicted by Mr. Bonnett at the meeting of the applicant and his engineers with our leadership group held 5/4 at the Indian Trail Library.

Mr. Bonnett, with Mr. Douglass in attendance, stated to us that the project would be built out in 4 phases over a 5 to 10 year period.

This raises the question as to whether Mr. Douglass has changed his mind, or whether this was an attempt to convince us to support the proposal by minimizing the true impact.

From the 7/5 developer meeting with Planning:

- There was discussion about the previous neighborhood planning process.
- LK advised that although the full plan was not adopted the zoning recommendations were.

Response:

Just to clarify the reason for non-adoption of the full plan, the following is an email from John Dietzman:

Subj: **NIT Specific Plan Draft**
 Date: 1/7/2007
 To: Craig_Culbertson@acordia.com, jfbakke@earthlink.net

Craig and Jim:

Here is the last draft of the NIT Specific Plan that we submitted to Planning Service. Cheryl and I reviewed it with Steve Franks and Ken Pelton on 3/1/06, and they said the policies and the zone changes would have to be removed. All policies are in the Comp Plan and any changes/additions must be done by amendment to the Comp Plan. All zone changes would have to be done by amendment to the Comp Plan. We can't make such changes/additions (as we had been led to believe for 3 years) via the process of submitting a Specific Plan and getting it approved by City. This was a bolt out of the blue and basically made the plan useless since now we could not accomplish the most important part of the Specific Plan, namely the rezoning of the Douglas property from R3 to R1.

In addition, they said due to budget constraints, Planning Services couldn't provide anyone to review it and help us put it into a form that could be submitted and formally approved and made part of the law, part of the Comp Plan. They suggested maybe we could submit it not as a "Specific Plan" addition to the Comp Plan, but instead turn it into a "Vision" or an "Advisory" document that could be submitted to the City and they would "acknowledge receipt" rather than vote on and approve or deny the document.

No further work has been done on the document since that meeting.

John Dietzman

The reference to the Douglass property in the last line of the first paragraph is to the east portion of the Hunt's Pointe property.

When Jim Bakke served on the CA-NPAC he asked the Planning Director multiple times if the above NIT Specific Plan could be reviewed and revised in order to be acceptable. He did not get an answer. The director made it clear to the committee that he did not want to see 27 neighborhood plans lined up on a shelf with the comp plan.

Best Regards,

Terry Deno
Chair

Mel Neil
Vice-Chair/Treasurer

Curt Fackler
Past-Chair

Mark Davies
CA Rep

Jim Bakke
Past CA Rep

Mike Husted
IT/E-mail Facilitator