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

A. Per the City of Spokane Zoning map, the subject parcel is in the CB-55 and RHD-35 zones.
B. According to Spokane Municipal Code Section 17C.110.030 – Characteristics of Residential Zones, the Residential High Density (RHD) zoning category are high-density residential zones where allowed developments are characterized by high amount of building coverage. The major types of new housing will be attached/detached single family residential, duplexes, medium and high-rise apartment complexes, condominiums. The minimum density is 15 dwelling units per acre; the maximum is limited by other code provisions.
C. Per Spokane Municipal Code Section 17C.120.030 – Characteristics of Commercial Zones, the Community Business (CB) zoning category are commercial zones where the area is predominantly developed with auto-accommodating commercial uses. Residential household living is allowed within this zone, which includes apartment complexes.
D. Table 17C.110-2 states that multi-dwelling structures are allowed for the RHD zoning category, and SMC Table 17C.120-1 states that residential household living is allowed in the CB zoning category.

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

LU 3 – Efficient Land Use
- We believe that the proposed short plat will continue to promote the efficient use of land by placing these lots adjacent to existing development and public services. This development as proposed will implement the following policies:
  - LU 3.1 Coordinated and efficient land use
    - This project is located along Whistalks Way, where existing services and facilities are in place and can be reasonably extended into the development.

LU 4 – Transportation
- We believe that the proposed will provide public streets and lots that will utilize existing transportation infrastructure and thereby promote the efficient use of the proposed and built environment. This development as proposed will implement the following policy:
  - LU 4.1 Land use and transportation
    - This project includes a trip generation and distribution letter, which forecasts the future transportation needs of the project. This project as required will participate in the city’s impact fee ordinance to mitigate transportation impacts from this development.

LU 5 – Development Character
- We believe that the development of this short plat will continue to utilize geographic areas that will maintain both the existing and proposed built environments without placing undue burden on the area residents or services. This development as proposed will implement the following policy:
• **LU 5.5 Compatible development**  
  o As a multifamily infill development, this project is compatible with the multifamily land uses to the north and northwest and the education land use to the northeast.

LU 7 – Implementation  
• We believe that the development of this plat will ensure the implementation of the goals and policies of the City’s Comprehensive Plan by promoting infill development, thereby limiting sprawl opportunities.

LU 8 – Urban Growth Area  
• The development of this plat within the UGA and within the City’s corporate limits meets the goals of this policy. This development as proposed will implement the following policy:
  • **LU 8.1 Role of Urban Growth Areas**  
    o This project is located within the UGA and the City of Spokane, where public facilities exist adjacent to or in the nearby vicinity.

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

A. As identified in this section, this project will meet concurrency as defined for all elements (A to I) listed under 17D.010.010 Applicability and will not affect overall levels of service.
  i. Transportation: the project will not add any additional densities not considered in the comprehensive plan and is agreeable to pay the City of Spokane Traffic Impact Fees associated with the region.
  ii. Public Water: the additional water services will be reviewed by The City of Spokane Public Works and is in the Retail Water Service Area. Comments from City of Spokane Water Department staff in the pre-development conference notes indicate that water is anticipated to be approximately 95-98 psi at surrounding hydrants, which will meet city requirements of 45 psi for fire flow and potable water.
  iii. Fire Protection: The City of Spokane Capital Facilities Plan (Appendix C of the comprehensive plan) references the Washington Survey and Rating Bureau and states that areas greater than five road miles from a fire station receive a 9A rating and typically an increase of insurance rates. The project site is located 3.6 road miles from Station 13 at 1118 W Wellesley Avenue. The project will not add any additional densities not considered in the comprehensive plan.
  iv. Police Protection: The City of Spokane Capital Facilities Plan identifies that the city has funding to support an adequate level of service for police through 2023. The project will not add any additional densities not considered in the comprehensive plan.
  v. Parks and Recreation: As this project is not a PUD, no parks or recreation space is required. The apartments may have amenities or a clubhouse, to be determined later.
  vi. Library: the project will not add any additional densities not considered in the comprehensive plan.
  vii. Solid Waste disposal and recycling: the project will not add any additional densities not considered in the comprehensive plan. Comments from City of Spokane Solid Waste staff in the pre-development meeting notes indicate that the plans would be approved as shown.
  viii. Schools: The project site is currently served by Hutton Elementary, Sacajawea Middle School, and Lewis and Clark High School. The capital facilities plan
identifies that Sacajawea is slated to be replaced in the future. The project will not add any additional densities not considered in the comprehensive plan.

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

B. As required, it is understood that further concurrency tests will be made by staff and other affected agencies. If a concurrency test were to be marginal, appropriate provisions would be implemented to bring this plat back into level of service conformance such as the payment of traffic impact fees or other modifications that may be required to meet the appropriate and identified levels of services for the noted facilities and services, these changes may affect existing water and sewer facilities.

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

A. A copy of the preliminary plat is attached utilizing topography obtained in the field and supplemented by Washington State Lidar and the proposed lots are adequate for required density as proposed. Some grading should be expected to ensure the establishment of proper building pads, roads and utility extensions.

B. The lots proposed in the preliminary plat will be apartment or townhouse residences. The proposed residences are generally similar to the apartments to the north and west, as well as those in the center of the western section of the parcel (the chamber of the pipe-shaped parcel).

C. Soils, slope and drainage features have been considered as a part of this project.

D. Public utilities including water and sewer are available to this project. This project will be required to provide extensive water and sewer extensions for service. Preliminary design reports for water and sewer have been prepared and are a part of this application.

E. A Geotechnical report has been or will be prepared for this proposal.

F. There is no apparent evidence of historic or cultural features on site and a cultural resource survey has been ordered to verify that no historic or cultural features are onsite.

G. As required by the SRSM, all storm water will be treated and disposed on site or as allowed.

5. Please explain any significant adverse impact on the environment or the surrounding properties the proposal will have and any necessary conditions that can be placed on the proposal to avoid significant effects or interference with the use of neighboring property or the surrounding area, considering the design and intensity of the proposed use.

A. We believe that the existing zoning and inclusion within the city limits would have contemplated the addition of these lots on this property and therefore, this project is not anticipated to have any substantial impact to the neighboring property or the surrounding area as whole; however, traffic impacts will be mitigated to maintain levels of service as necessary.
6. Demonstrate how the proposed subdivision makes appropriate (in terms of capacity and concurrence) provisions for:
   a. Public health, safety and welfare
      This short plat will successfully implement the goals and policies of the City’s Comprehensive Plan and declared housing emergency and therefore as noted in the plan will provide for the public’s health, safety and welfare, by providing housing in an area where little to no new or affordable (market rate) housing is available.
   b. Open spaces
      As this project is not a PUD, no open space is required; however, there will be open spaces located around apartment and townhouse structures as required by the floor-area ratio (FAR) of the underlying zone.
   c. Drainage ways
      This short plat is being developed in accordance with the Spokane Regional Stormwater Manual. All stormwater will be captured, treated, detained and discharged onsite.
   d. Streets, roads, alleys and other public ways
      This project will create one drive aisle that will serve lot 1 and lots 3-7 and will connect to Whistalks Way at multiple points. Paths and sidewalks will be installed onsite for recreation and pedestrian travel. Frontage improvements are required along Whistalks Way, with a 12’ separated sidewalk required by the City of Spokane predevelopment meeting notes. Finally, an alley system will be built on the rear side of the townhouses to allow for vehicular access.
   e. Transit stops
      The site is directly adjacent to the nearest transit stop, Whistalks Way @ Randolph on STA bus route 20.
   f. Potable water supplies
      This short plat is located within the city’s water service boundary and will be served by city water, extensions will be required per the city comprehensive plan level of service standard pg 37. By existing policy, the City of Spokane Water Department requires that the water system provide the Specified LOS at a minimum pressure of 45 psi. Comments from City of Spokane Water Department staff in the pre-development conference notes indicate that water is anticipated to be approximately 95-98 psi at surrounding hydrants; therefore, we believe that the standard of LOS will be met. There is a 12-inch ductile iron main in Whistalks Way and a 12-inch ductile main in River Ridge Boulevard. Comments from the water department indicate that there is an existing 6-inch domestic water service/fire line and 2-inch irrigation line running to this parcel. Whether this line is sufficient will be determined at a later date. There is an abandoned 6-inch water main at the east side of the site which will be removed as part of this project. While water is available to the project, the final route and connection points are still being determined and will be finalized during the design phase of the project.
   g. Sanitary wastes
      The proposal intends to connect into the existing system with the use of a gravity sewer system. There is an 8-inch concrete sewer line in Whistalks Way that is proposed to serve the development. These sewer lines eventually pass CSO 7 before entering the City of Spokane Wastewater Treatment Plant on Aubrey L. White Parkway.
h. Parks, recreation and playgrounds
There are no required parks, recreation or playgrounds for the project site, as we are not proposing a PUD. Directly across Whistalks Way is the Spokane Falls Community College, which has recreational facilities, and further north is Downriver Park.

i. Schools and school grounds
The project site is currently served by Hutton Elementary, Sacajawea Middle School, and Lewis and Clark High School. The capital facilities plan identifies that Sacajawea is slated to be replaced in the future. The project will not add any additional densities not considered in the comprehensive plan.

j. Sidewalks, pathways and other features that assure safe walking conditions
This short plat proposes sidewalks and/or paths and therefore will meet this requirement. If sidewalks are broken, heaved, or otherwise damaged, they will be replaced per city code.