



January 20, 2016

City of Spokane
Tami Palmquist, Associate Planner
Planning and Services Department
3rd Floor, City Hall
808 W Spokane Falls Blvd.
Spokane, WA 99201

Subject: Shorelines Letter of Exemption for the Howard Street South Channel Bridge Replacement

Dear Ms. Palmquist:

The Spokane Parks and Recreation Department is requesting a shorelines exemption for replacing the Howard Street South Channel Bridge (South Channel Bridge). The existing bridge is being replaced with a smaller bridge, within the existing bridge 'footprint' to mitigate deteriorated capacity and safety of the existing structure. Also, as part of that project, the existing Theme Stream Bridge will be temporarily modified with a contained earth fill to provide construction access to the South Channel Bridge. This exemption request includes other temporary construction related activities for the bridge replacement including the Sister Cities' laydown and staging area north of the bridge and another staging area south of the bridge. CH2M's engineering estimate for contractor's work is approximately \$6 million. The exemption request is based on Spokane Municipal Code 17.E.60.300(B)(2):

"Normal maintenance or repair of existing structures or developments, including damage by accident, fire or elements. "Normal maintenance" means those usual acts to prevent a decline, lapse, or cessation from a lawfully established state comparable to its original condition, including but not limited to its size, shape, configuration, location, and external appearance, within twelve months after decay or partial destruction, except where repair causes substantial adverse effects to shoreline resources or environment. Replacement of a structure or development may be authorized as repair where such replacement is the common method of repair for the type of structure or development and the replacement structure or development is comparable to the original structure or development including but not limited to its size, shape, configuration, location and external appearance and the replacement does not cause substantial adverse effects to shoreline resources or environment."

Included in this shorelines exemption request are:

- Cover letter requesting a Shorelines Exemption with following attachments:
 - City of Spokane Planning Services Department, Shoreline/Critical Areas Checklist

- *Howard Street South Channel Bridge Replacement Anticipated Bridge Construction Procedures* technical memorandum with Figures 1-6
- Theme Stream Crossing (Figure 1)
- *Howard Street South Channel Bridge Replacement Draft Hydraulic Report* (Draft because it is currently under Avista review)
- SEPA Environmental Checklist
- Photographs of the site (shown in following pages)

Please do not hesitate to contact me with any questions or for additional information. Thank you for your consideration of this exemption request.

Sincerely,

A handwritten signature in dark ink, appearing to read "Berry Ellison", with a long horizontal flourish extending to the right.

Berry Ellison, PLA
Riverfront Park Redevelopment Program Manager

Letter_of_Exemption_Shorelines-01-19-16

C: Marlena Guhlke/CH2M
Michelle Anderson

Photos

Howard Street South Channel Bridge

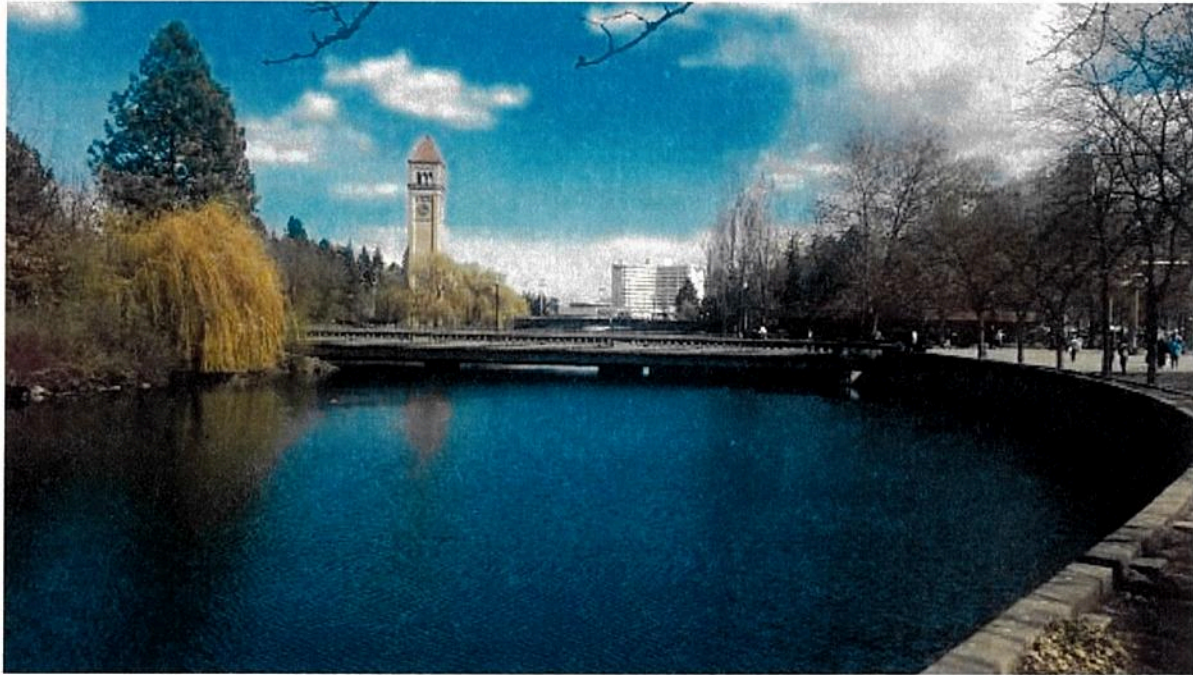


Photo 1: On the southwest side of the Howard Street South Channel Bridge looking east towards Riverfront Park's Clock Tower.



Photo 2: At southwest corner of the Howard Street South Channel Bridge looking towards the northwest corner, which is the only bridge riverbank with native soil/vegetation to river's edge. Riverbanks at remaining corners of the bridge have concrete walls and concrete/asphalt ground surfaces.

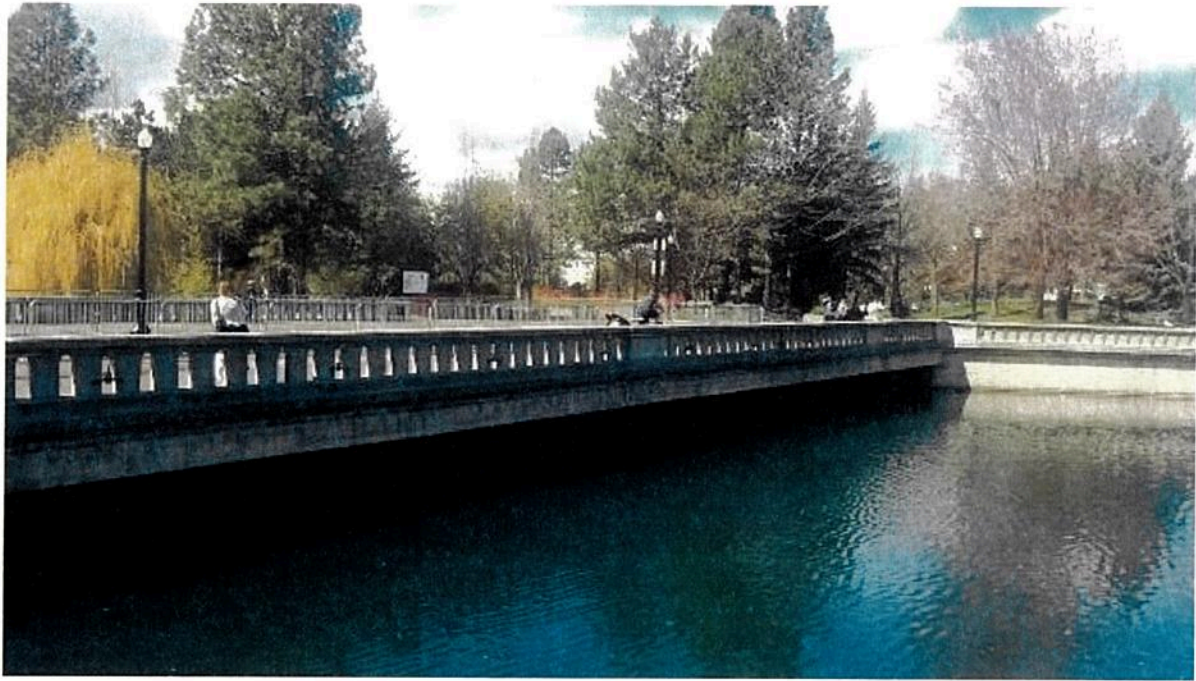


Photo 3: On south river bank looking at northeast corner of the Howard Street South Channel Bridge and the wing wall that connects the bridge to concrete walls that makeup Avista's power facility's forebay.



Photo 4: At south end of the Howard Street South Channel Bridge looking north. Shows barricades in the center of the bridge restricting passage and load weight because of bridge's poor structural conditions.