



March 30, 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 Park-wide Riverfront Park subsurface explorations and park maintenance that includes the Howard Street Middle Channel Bridge and Loeff Carousal geotechnical investigations and all subsurface explorations for the entire Riverfront Park Redevelopment projects and improvements.

Dear Tami Palmquist:

The Spokane Parks and Recreation Department is requesting a shorelines exemption for conducting subsurface explorations, site investigation activities, and for the normal maintenance and repair of the facilities throughout the Riverfront Park grounds to implement the Riverfront Park Redevelopment Master Plan. This includes pot holing for utility and irrigation locations; park and general maintenance; geotechnical, cultural resources and hazardous materials investigations; and soil testing to accommodate temporary and permanent uses of the park. There may also be other environmental and engineering investigations as the projects progress.

Maintaining the use of the park during the four to five year construction period will also require installing temporary fencing and signage to keep park users out of the construction areas. Early investigative work will be at the Loeff Carousal Building area and the North Bank, followed by the Howard Street Middle Channel Bridge and construction of facilities and landscaping on Havermale Island.

This exemption request is based on the City of Spokane Shoreline Regulations Section 17E.060.300 (B):

“Site exploration and investigation activities that are prerequisite to preparation of an application for development authorization under these Shoreline Regulations, when conditions apply.”

And also 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:

- Shorelines/Critical Area Checklist
- 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 Shorelines exemption request.

Sincerely,



Berry Ellison
Program Manager of Riverfront Park Bond

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c: Marlena Gohlke/CH2M
Michelle Anderson/Environmental Consulting LLC