



Building Opportunity for Housing

Comprehensive Plan Residential Policy Analysis

January 11, 2023

I. Executive Summary

This report is an initial step towards completion of the Building Opportunity for Housing project, which is itself a function of the City's Shaping Spokane Housing program. This program, created in response to an ongoing housing crisis in the region, is an implementation arm of the City's Housing Action Plan, completed in 2020. For more information, we recommend readers visit www.shapingspokanehousing.com.

As part of the Building Opportunity for Housing project, Planning and Economic Development Staff undertook a literature review and analysis of the City of Spokane Comprehensive Plan as it relates to housing in general and specifically the diversity of housing types allowed in the city. This report is intended to foster greater understanding by the public and decisionmakers as to the existing support in the Comprehensive Plan for diverse housing and those portions of the plan (vision, goals, policies, maps, etc.) that could be improved. Also included is a listing of possible conflicts within the plan or areas in which updates could be made to increase the amount of overlap between chapters and individual goals & policies. Finally, this report provides updated economic figures around permitting, housing affordability, and the rental market.

Following careful study of existing comprehensive plan vision, goals, policy, additional input by the Housing Action Plan, and analysis of economic trends, this report provides the following summary conclusions:

1. Housing diversity in every part of the city is not only well supported by the Comprehensive Plan, but the plan specifically calls for it.
2. Relatively few policies in the Comprehensive Plan may require update and amendment to reduce barriers to housing diversity and choice. Primarily, Policies LU 1.3 and LU 1.4 are recommended for update/amendment.
3. Economic indicators and development patterns point to a significant need for adjustments to housing growth strategies by the City.

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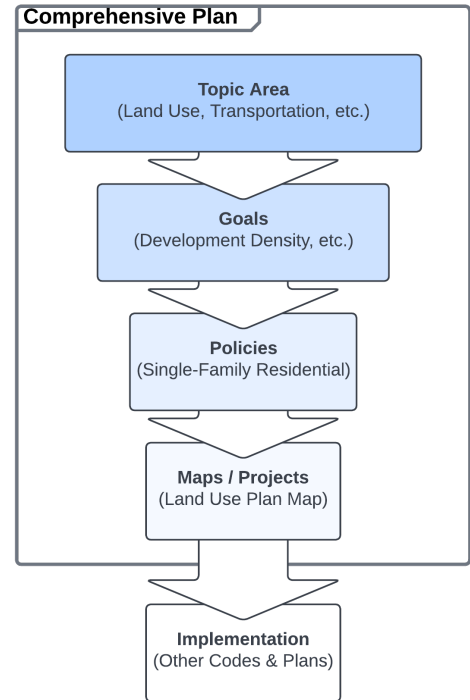
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II. Comprehensive Plan Policy Purpose and Intent

The City’s Comprehensive Plan was originally adopted in 2002 following the State’s passage of the Growth Management Act. It serves as an overall general guide to development, growth, and operation of the City. Accordingly, it touches on all aspects of City government and operations, including significant chapters on Land Use, Transportation, Housing, Public Facilities, and others. As such, the Comprehensive Plan serves as the umbrella guide that then flows down into more specialized/specific actions by the City, including the creation and maintenance of the Spokane Municipal Code (SMC), regional and local facilities planning, and even the operations and actions of City government activities.

The Comprehensive Plan is generally structured into a vision for each topic area, goals that seek to achieve that vision, and policies that guide City actions towards those goals. In some chapters, such as Transportation, the Comprehensive Plan includes specific improvement projects necessary to comply with the policy and goals of the plan. However, not every chapter includes such specific actions—in general the plan provides a goal and policy structure under which more work and effort is necessary to implement the community’s crafted vision.

Figure 1 Typical Comprehensive Plan Progression



III. A Review of Comprehensive Plan Policy

As a document towards the management of growth in the city, among many other topics, the Comprehensive Plan naturally touches on the topic of housing in numerous locations. This occurs primarily in Chapter 3, Land Use, but also in Chapter 6, Housing, and Chapter 11, Neighborhoods. As part of the analysis presented herein, the following subsections summarize the goals, policies, and text of the Comprehensive Plan concerning housing provision and diversification.

Chapter 3—Land Use

As the first topical chapter in the Comprehensive Plan, Chapter 3 naturally sets the stage for growth and development throughout the City.

Vision: Land Use

The stated Land Use vision in the Comprehensive Plan is as follows:

Growth will be managed to allow a mix of land uses that fit, support, and enhance Spokane’s neighborhoods, protect the environment, and sustain the downtown area and broaden the economic base of the community. (p. 3-5)

In seeking that vision, the Comprehensive Plan includes several land use values that should be followed. Those that touch on the topic of housing include:

- *Protecting the character of single-family neighborhoods;*
- *Guaranteeing a variety of densities that support a mix of land uses; and*
- *Utilizing current residential lots before developing raw land. (Ibid.)*

Active verbs in these values include terms like “protect” and “guarantee,” strong verbs that often leave little flexibility when it comes to changing environments and new opportunities. Furthermore, the intent of words like

“protect” or “character” can be subject to different interpretation by different readers. To achieve this overall vision for land use, and in consideration of the stated values, Chapter 3 includes several goals and policies that concern or could affect the provision of housing in Spokane. These are summarized in **Table 1** below. Please note that while the primary text of the policies is included in these tables, there is much more discussion in the Comprehensive Plan for some policies. This discussion, when relevant, is described in the right-hand column.

Table 1 Goal & Policy Summary, Land Use Chapter

Goal/Policy Number	Primary Text	Effect (In Brief)
GOAL LU 1	<i>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 a vibrant urban center.</i>	<p>PRIMARY GOAL OF CONCERN</p> <ul style="list-style-type: none"> • Policies under this goal concern land use in the city. • Specifically mentions the need to manage residential development.
LU 1.3	<i>Single-Family Residential Areas: Protect the character of single-family residential neighborhoods by focusing higher intensity land uses in designated Centers and Corridors.</i>	<p>PRIMARY POLICY OF CONCERN</p> <ul style="list-style-type: none"> • Describes where single-family housing should be placed. • Seeks to focus higher-density development in Centers & Corridors. • Includes the phrase, “[Residential neighborhoods] are worthy of protection from the intrusion of incompatible land uses,” though what those incompatible land uses might be is left unexplored. • Calls for design standards and other “creative mechanisms” to avoid detrimental effects from conflicts.
LU 1.4	<i>Higher Density Residential Areas: Direct new higher density residential uses to Centers and Corridors designated on the Land Use Plan Map.</i>	<p>PRIMARY POLICY OF CONCERN</p> <ul style="list-style-type: none"> • Call for higher-density residential uses to be directed to Centers & Corridors. • The policy includes possible exceptions to this, but the language is unclear. • Mentions apartments, condos, small-lot homes but not duplexes or specific units/acre.
LU 1.15	<i>Airfield Influence Areas: Prohibit the siting of land uses that are incompatible with aviation operations in the Airfield Influence Areas designated on Comprehensive Plan maps, and contain residential Comprehensive Plan designations and zoning in the Airfield Influence Areas to their existing locations not allowing for expansion or increases in residential density.</i>	<ul style="list-style-type: none"> • Increased residential density of any kind should avoid the airport influence areas.
LU 1.16	<i>Mobile Home Parks: Designate appropriate areas for the preservation of mobile and manufactured home parks.</i>	<ul style="list-style-type: none"> • Mobile home parks (MHP) are described specifically. • MHP are described as a possible solution to affordable housing needs. • Maintains compliance with WA State regulations regarding planning and mobile home parks.

Goal/Policy Number	Primary Text	Effect (In Brief)
GOAL LU 2	Public Realm Enhancement: Encourage the enhancement of the public realm.	<ul style="list-style-type: none"> • Policies under this goal involve interaction between development and the public realm.
LU 2.1	<u>Public Realm Features:</u> Encourage features that improve the appearance of development, paying attention to how projects function to encourage social interaction and relate to and enhance the surrounding urban and natural environment.	<ul style="list-style-type: none"> • Provides a nexus for design/site standards for development in the city. • Specifically mentions interactions between new projects and existing development as a concern. • Seeks to foster links between public and private spaces.
LU 2.2	<u>Performance Standards:</u> Employ performance and design standards with sufficient flexibility and appropriate incentives to ensure that development is compatible with surrounding land uses.	<ul style="list-style-type: none"> • Provides direction for design and development standards in the city. • Primary call for development to be compatible with adjacent uses. • Offers the possibility of bonuses in height, density, etc. if a project “enhances the public realm.”
GOAL LU 3	Efficient Land Use: Promote the efficient use of land by the use of incentives, density and mixed-use development in proximity to retail businesses, public services, places of work, and transportation systems.	<ul style="list-style-type: none"> • Policies under this goal concern the main strategy for land use in Spokane, known as “focused growth”. (see section VII) • This is where Centers & Corridors as a land use topic are established.
LU 3.1	<u>Coordinated and Efficient Land Use:</u> Encourage coordinated and efficient growth and development through infrastructure financing and construction programs, tax and regulatory incentives, and by focusing growth in areas where adequate services and facilities exist or can be economically extended.	<ul style="list-style-type: none"> • Directs future growth to those parts of the City where adequate services and facilities exist before expanding. • Specifically mentions multi-family designations as a tool to direct higher density to these areas.
LU 3.2	<u>Centers and Corridors:</u> Designate Centers and Corridors (neighborhood scale, community or district scale, and regional scale) on the Land Use Plan Map that encourage a mix of uses and activities around which growth is focused.	<ul style="list-style-type: none"> • This is the primary policy directing growth to Centers & Corridors while generally limiting it elsewhere. • This policy provides the details as to what Centers & Corridors are and where they are designated within the city. • This policy has a direct connection to the Land Use Plan Map.
LU 3.6	<u>Compact Residential Patterns:</u> Allow more compact and affordable housing in all neighborhoods, in accordance with design guidelines.	<ul style="list-style-type: none"> • Calls out townhomes, ADUs, live-work housing, triplexes, zero-lot line, small-lot, and row houses as possible options. • Calls for some of these higher density uses in “all neighborhoods.”
LU 3.7	<u>Maximum and Minimum Lot Sizes:</u> Prescribe maximum, as well as minimum, lot size standards to achieve the desired residential density for all areas of the city.	<ul style="list-style-type: none"> • Allows for lot size standards in SMC Title 17. • Calls on the City to increase overall housing density in order to use available land most efficiently.
LU 4.6	<u>Transit-Supported Development:</u> Encourage transit-supported development, including a mix of	<ul style="list-style-type: none"> • Calls for encouraging greater density within the vicinity of any frequent transit.

Goal/Policy Number	Primary Text	Effect (In Brief)
	<i>employment, residential, and commercial uses, adjacent to high-performance transit stops.</i>	<ul style="list-style-type: none"> • Frequent transit is any stop with service at 15-minute intervals or less.
GOAL LU 5	<i>Development Character:</i> <i>Promote development in a manner that is attractive, complementary, and compatible with other land uses.</i>	<ul style="list-style-type: none"> • Policies under this goal focus on design requirements and standards.
LU 5.2	<i>Environmental Quality Enhancement:</i> <i>Encourage site locations and design features that enhance environmental quality and compatibility with surrounding land uses.</i>	<ul style="list-style-type: none"> • Concerns landscaping and site design. • Seeks to enhance compatibility of new development with existing development.
LU 5.3	<i>Off-Site Impacts:</i> <i>Ensure that off-street parking, access, and loading facilities do not adversely impact the surrounding area.</i>	<ul style="list-style-type: none"> • Calls out the need for parking/access/etc. facilities for multi-family development to meet the same standards as the primary use. • Includes standards for parking and access that would affect residential developments at higher densities.
LU 5.5	<i>Compatible Development:</i> <i>Ensure that infill and redevelopment projects are well-designed and compatible with surrounding uses and building types.</i>	<ul style="list-style-type: none"> • Seeks to minimize negative interaction between different land uses.
GOAL LU 7	<i>Implementation:</i> <i>Ensure that goals and policies of the Comprehensive Plan are implemented.</i>	<ul style="list-style-type: none"> • Policies under this goal concern the future actions/programs/codes and their need to implement the vision of the Comprehensive Plan.
LU 7.1	<i>Regulatory Structure:</i> <i>Develop a land use regulatory structure that utilizes a variety of mechanisms to promote development that provides a public benefit.</i>	<ul style="list-style-type: none"> • This policy provides the nexus for Title 17 SMC, the City’s land use standards. • This policy supports LU 2.2 in calling for density/height bonuses for projects that include a public benefit.

Chapter 3 concludes with two important features—a listing of all associated land use plan map designations and the Land Use Plan Map itself (Map LU-1). The description of land use plan map designations in the chapter includes four focused exclusively on residential, including:

- Residential 15+:** This designation allows higher density residential use at a density of 15 or more units per acre or more.
- Residential 15-30:** This designation allows higher density residential use at a density of 15 to 30 units per acre.
- Residential 10-20:** This designation allows single-family residences or two-family residences on individual lots or attached (zero-lot line) single-family residences. The allowed density is a minimum of 10 and a maximum of 20 units per acre. Allowed structure types are single-family residences or two-family residences on individual lots or attached (zero-lot line) single-family residences. Other residential structure types may be permitted through approval of a Planned Unit Development or other process identified in the development regulations.
- Residential 4-10:** This designation allows single-family residences, and attached (zero-lot line) single-family residences. The allowed density is a minimum of four units and a maximum of ten units per acre. Allowed structure types are single-family residences, attached (zero-lot line) single-

family residences, or two-family residences in appropriate areas. Other residential structure types may be permitted through approval of a Planned Unit Development or other process identified in the development regulations.

Chapter 3 concludes with the Land Use Plan Map, designated map LU1 by the Comprehensive Plan. This map provides a land use plan map designation for all properties in the City. It is not included here but can be found at www.shapingspokane.org.

Primary Policies of Concern

As highlighted in Table 1 above, there are two policies that often seem to limit development of additional housing types in low-density (single family residential) parts of the city. These two policies are LU 1.3 (Single Family Residential) and LU 1.4 (Higher Density Residential Areas). These two policies present some barriers to increased housing choice in the city, including the following considerations:

- By segregating single-family dwellings in their own singular policy, these housing types appear to be prioritized over all other types.
- The term “higher-density” is not defined, but often appears to be used to argue that anything more dense than single-family detached housing is considered “higher density” and thus limited only to Centers and Corridors in the City.
- The term “density” is not specifically described—namely whether density targets in the plan should represent an average throughout the city or a target for individual sites to accomplish. Currently the City enforces this on a site-by-site basis, which may be contributing to the average new development density in Residential Single-Family zones falling well below the maximum (6 dwellings per acre instead of 10).
- While these two policies have arguably resulted in hard limitations on density in most of the City, this approach would seem in conflict with the constellation of other policies and goals in the Comprehensive Plan that point to diversity and choice in housing in all neighborhoods.

Chapter 6—Housing

The housing chapter of the Comprehensive Plan builds on the development and growth strategies in Chapter 3 but focuses more intently on the housing supply in the City. It includes discussions of affordability, supply, and the need for greater homeownership and housing type mixes.

Vision: Housing

The stated Housing vision in the Comprehensive Plan is as follows:

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. (p. 6-4)

In seeking that vision, the Comprehensive Plan includes several housing values that should be followed. Those that touch on the topic of housing include:

- *Keeping housing affordable.*
- *Encouraging home ownership.*
- *Developing a good mix of housing types.*
- *Preserving existing houses.*
- *Rehabilitating older neighborhoods. (Ibid.)*

Affordability is a clear topic of concern in the vision and values, as is housing choice and the ability for residents of the city to achieve homeownership, if they so desire. Also described is the need to help older neighborhoods in the city maintain their livability and vitality into the future.

To achieve this overall vision for housing, and in consideration of the stated values, Chapter 6 includes several goals and policies that concern or could affect the provision of housing in Spokane. These are summarized in **Table 2** below.

Table 2 Goal & Policy Summary, Housing Chapter

Goal/Policy Number	Primary Text	Effect (In Brief)
GOAL H 1	<i>Housing Choice and Diversity:</i> Provide opportunities for a variety of housing types that is safe and affordable for all income levels to meet the diverse housing needs of current and future residents.	PRIMARY GOAL OF CONCERN <ul style="list-style-type: none"> This goal and it’s supporting policies form the crux of the discussion around housing choice.
H 1.4	<i>Use of Existing Infrastructure:</i> Direct new residential development into areas where community and human public services and facilities are available.	<ul style="list-style-type: none"> Cites the need to evaluate existing infrastructure capacity when directing new growth and redevelopment. Seeks to limit costs from expansion of services/utilities to new areas.
H 1.8	<i>Affordable Housing Requirement:</i> Include a percentage of affordable housing within all new developments that include housing.	<ul style="list-style-type: none"> Seeks to reverse historic economic segregation in the city. States that “housing types such as smaller homes on smaller lots or townhouse structures should be allowed.”
H 1.9	<i>Mixed-Income Housing:</i> Encourage mixed-income housing developments throughout the city.	<ul style="list-style-type: none"> Cites need for greater socioeconomic diversity in all parts of the city. Calls for the city to avoid placing low-income households in isolated “concentrations of poverty.”
H 1.13	<i>Siting of Subsidized Low-Income Housing:</i> Set clear site selection criteria for publicly subsidized housing to minimize geographic concentrations of publicly subsidized housing projects in neighborhoods with a high percent of minority or low-income households.	<ul style="list-style-type: none"> Seeks to avoid concentrating low-income housing in few locations while ignoring the opportunities and connections granted by other locations.
H 1.18	<i>Distribution of Housing Options:</i> 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.	PRIMARY POLICY OF CONCERN <ul style="list-style-type: none"> Principal policy calling for wider diversity of housing everywhere in the City. Specifically calls for diversity “throughout the city,” not only in targeted/limited areas.
H 1.19	<i>Senior Housing:</i> Encourage and support accessible design and housing strategies that provide seniors the opportunity to remain within their neighborhoods as their housing needs change.	<ul style="list-style-type: none"> Supports diverse housing types everywhere, not just in specific locations.
H 1.20	<i>Accessory Dwelling Units:</i> Allow one accessory dwelling unit as an ancillary use to single-family homes in all designated residential areas as an affordable housing option.	<ul style="list-style-type: none"> Calls for allowing ADUs in all single-family areas, not just targeted locations.

Goal/Policy Number	Primary Text	Effect (In Brief)
GOAL H 2	<i>Housing Quality:</i> <i>Improve the overall quality of the City of Spokane’s housing.</i>	<ul style="list-style-type: none"> • Focuses on quality, rather than diversity, but does include some policy direction that impels greater reuse of existing neighborhoods.
H 2.3	<i>Housing Preservation:</i> <i>Encourage preservation of viable housing.</i>	<ul style="list-style-type: none"> • Cites the value of older housing to serve the need, in part, for affordable housing in the City. • Calls for preservation of existing housing where possible. • States that efforts to intensify development (i.e. sub-area plans) should also seek to preserve viable existing housing.
H 2.4	<i>Linking Housing with Other Uses:</i> <i>Ensure that plans provide increased physical connection between housing, employment, transportation, recreation, daily-needs services, and educational uses.</i>	<ul style="list-style-type: none"> • Viability for new housing locations should consider transportation and other service proximity. • Sets target for basic services within one mile of housing.

Chapter 11—Neighborhoods

The neighborhoods chapter of the Comprehensive Plan continues the discussion of land uses and development but focuses instead on neighborhood-scale concerns. It refines earlier topics in the Comprehensive Plan (traffic, facilities, etc.) by focusing on their provision and standards within the neighborhood environment.

Vision: Neighborhoods

The stated Neighborhoods vision in the Comprehensive Plan is as follows:

Spokane’s neighborhoods will be safe, inclusive, diverse, and livable with a variety of compatible services. Existing neighborhoods will be preserved or enhanced and new distinctive neighborhoods, including the downtown area, will be established so that a sense of community is promoted. (p. 11-4)

In seeking that vision, the Comprehensive Plan includes several neighborhood values that should be followed. Those that touch on the topic of housing include:

- *Preserving or enhancing older neighborhoods.*
- *Honoring the uniqueness of existing neighborhoods and the need for unique new neighborhoods.*
- *The need to ensure, among other things, economically diverse neighborhoods. (Ibid.)*

The vision for neighborhoods is that each should operate like “small towns,” with a range of housing, services, and amenities in each neighborhood, while keeping the downtown focused on the most intense, most diverse development types. To achieve this overall vision for neighborhoods, and in consideration of the stated values, Chapter 11 includes several goals and policies that concern or could affect the provision of housing in Spokane. These are summarized in **Table 3** below.

Table 3 Goal & Policy Summary, Neighborhoods Chapter

Goal/Policy Number	Primary Text	Effect (In Brief)
GOAL N 2	<i>Neighborhood Development:</i> Reinforce the stability and diversity of the city’s neighborhoods in order to attract long-term residents and businesses and to ensure the city’s residential quality, cultural opportunities, and economic vitality.	<ul style="list-style-type: none"> This goal and its associated policies touch on the concepts of housing diversity at the neighborhood scale.
N 2.1	<i>Neighborhood Quality of Life:</i> Ensure that neighborhoods continue to offer residents transportation and living options, safe streets, quality schools, public services, and cultural, social, and recreational opportunities in order to sustain and enhance the vitality, diversity, and quality of life within neighborhoods.	<ul style="list-style-type: none"> References living options as important for neighborhood vitality and quality of life. Further text cites the need for a “variety of living opportunities.”
N 2.4	<i>Neighborhood Improvement:</i> Encourage revitalization and improvement programs to conserve and upgrade existing properties and buildings.	<ul style="list-style-type: none"> Envisions neighborhoods as dynamic entities, not static and unchanging.

IV. Spokane’s Housing Action Plan and Housing Diversity

The City completed a Housing Action Plan (HAP) in 2021, funded in part by a grant from the Washington Department of Commerce. The HAP sought to identify actions the City could undertake to increase housing options as well as increase overall housing development in the city. As stated in the HAP introduction, “The purpose of the HAP is to consider actions that will promote greater housing diversity, affordability, and access to opportunity for residents of all income levels in Spokane.”¹ As it relates to the Comprehensive Plan and vision for the community, the HAP is intended to further “guide implementation of Comprehensive Plan policies by identifying strategies and gaps to further encourage housing development to meet [the City’s] housing goals and policies.”

The HAP included four overarching priorities for the plan:

- A. Increase** housing supply, options, and affordability for all incomes.
- B. Preserve** housing affordability and quality to help people thrive where they live.
- C. Enhance** equitable access to housing and homeownership.
- D. Leverage and grow** partnerships to support housing initiatives across the region.

The HAP maintains a direct connection to the Comprehensive Plan, serving to inform and call for implementation strategies that are designed to meet the priorities listed above. This can best be summarized by the following graphic (**Figure 2**, following page), taken from the HAP itself, showing the relationship of the HAP and how it relates to both Comprehensive Plan and implementation efforts like the Building Opportunity for Housing project.

¹ City of Spokane. (2022, July) Housing Action Plan: Housing Actions for All. Available online at <https://my.spokanecity.org/housing/spokane-housing-action-plan/>

Figure 2 Relationship Between the Housing Action Plan and the Comprehensive Plan



HAP Priority “A,” Increasing Housing Supply and Options

The HAP highlighted the fact that nearly 70 percent of all housing in the city is comprised of single-family detached homes. Typical “missing middle” homes (duplex, triplex, fourplex, townhome developments) make up less than 9 percent of all homes in the city. A similar trend can be found in the types of units the City permits each year. Missing middle housing types made up only 4.9 percent of residential permits in the city in 2021². In 2020 a similar proportion of missing middle types was permitted—4.4 percent. While some variation has been seen from year to year, the overall average per year is approximately 5.5 percent since 2008.

Considering this trend towards limited missing middle housing, and the lowering affordability for both rental and purchase homes, the HAP included Priority A calling for both increased supply overall and a greater diversity of housing options in the city. To accomplish this, the HAP includes draft strategy A1, calling on the City to consider allowing greater housing options and to encourage missing middle housing “throughout Spokane’s neighborhoods.” Actions considered in the HAP to accomplish this goal includes allowing more housing types in single-family residential areas. Specific actions called for by the HAP that relate to housing choice and missing middle housing types are provided in **Table 4** below.

Table 4 Actions Identified by the Housing Action Plan, Priority A

Primary Text	Effect (In Brief)
Action for Consideration: <i>More housing types in currently zoned single-family Areas</i>	
<i>Allow duplexes (two units per lot) in RSF and RSF-C zones, on each parcel or each corner lot.</i>	<ul style="list-style-type: none"> • Allowing duplexes on corner lots only would limit the overall effect but could avoid increasing the average density in most neighborhoods. • Allowing duplexes outright would have the most effect overall on density over a long period of time, but immediate effects may still be limited due to available lot area, utility connections, and other factors

² City Permit Data—Assembled by City Staff for required WA Office of Financial Management annual reports.

Primary Text	Effect (In Brief)
<i>Increase the allowed number of attached units on individual lots in RSF, RSF-C, and RTF zones outright, without the requirement of a planned unit development (PUD) process.</i>	<ul style="list-style-type: none"> Currently the City limits the number of permitted attached units on individual lots³. This action would allow for more flexibility when site conditions make it feasible for more than what is currently allowed.
<i>Allow additional housing types in RSF, RSF-C, and RTF zones, and adapt zoning with design standards consistent with current Comprehensive Plan policies, considering triplexes, fourplexes, townhomes, courtyard apartments on each parcel.</i>	<ul style="list-style-type: none"> This consideration would couple increased density with specific design requirements that seek to limit/minimize conflicts with existing single-family detached homes.
<i>Permit additional “missing middle” housing types in a wider range of residential zones with specific design standards, including duplexes, triplexes, quadplex, sixplex, stacked flats, townhomes, courtyard apartments.</i>	<ul style="list-style-type: none"> This is specifically targeted at missing middle housing types but calls for consideration of additional types not examined by other items on this list (i.e., sixplex).
Action for Consideration: <i>Encourage increased density and housing types in all residential areas.</i>	
<i>Consider creating one or more zoning districts of medium density in which individual lots may be no larger than three thousand five hundred square feet and single-family residences may be no larger than one thousand two hundred square feet.</i>	<ul style="list-style-type: none"> Essentially, this would result in a small-lot residential zone where density is higher than currently allowed in either RSF or RSF-C zones. Considers a type of housing sometimes called “narrow houses” or “skinny homes.”
<i>Revise density requirements in the Land Use Chapter of the Comprehensive Plan to allow development of more housing types in the “Residential 4 to 10” and “Residential 10 to 20” land use plan map designations, duplexes, triplexes, quadplexes, sixplexes, stacked flats, townhouses, or courtyard apartments.</i>	<ul style="list-style-type: none"> Only residential land use designations in the Comprehensive Plan include a minimum and maximum density. The Comprehensive Plan is not clear if density limits are averages across an area to be sought or a limitation on a site-by-site basis. This would constitute a valuable but new way of describing housing in the comprehensive plan, perhaps considering type and character instead of only density.
<i>Revise the lowest dwelling units per acre allowed by the Comprehensive Plan. Such as increasing the minimum density from four to six dwelling units per acre in any residential zones, where the residential development capacity will increase within the city.</i>	<ul style="list-style-type: none"> The current minimum residential density in the Comprehensive Plan is 4 units per acre. The current average development density for new houses in RSF zones is approximately 6 units per acre.⁴
<i>Explore and adopt a new policy in the Comprehensive Plan Chapter 3, Land Use, that would provide guidance and direction for the establishment of additional “missing middle” housing types.</i>	<ul style="list-style-type: none"> Adding a policy specifically supporting missing middle housing in the City may pave the way for the development of future projects that increase housing choice in the City.

V. Council Action on the Housing Action Plan

When considering the HAP, the Spokane City Council passed resolution 2021-0062, which not only adopted the Housing Action Plan but also an attachment added by City Council, known as “Attachment B: Implementation Plan.” While the HAP provides for several specific priorities and possible actions (as described in the preceding section), the Council’s attachment to the HAP included near-term and immediate actions they felt were warranted to curb a “critical shortage of residential housing within the City of Spokane” (Res 2021-0062, Attachment B).

³ The interim zoning ordinance, [Building Opportunity and Choice for All](#), allows for an unlimited number of attached units, but it’s important to note that the ordinance is temporary.

⁴ City GIS (Geographic Information System) data, prepared by Planning & Economic Development staff.

The Implementation Plan cites four infrastructure priorities, within which City near-term efforts should be focused. These are:

1. Existing Centers and Corridors, including Downtown;
2. Fifteen-minute walkability from the borders of Centers and Corridors (1/2 mile);
3. Existing residential neighborhoods; and
4. Greenfields . . .

Within those priority areas, the Implementation Plan called for numerous actions that the City should study and undertake. Specific actions were called for in consideration of six summary strategies, as follows:

- A. **Land Use Changes to Support Increased Density**—Including possible amendment of the definition of residential single-family to include duplexes, a pilot project to allow triplex and fourplexes in RSF zones provided they conform to the character of single-family residences and allowing stacking of units in RTF zones while preserving current height maximums.
- B. **Support for Rapid Development of Accessory Dwelling Units (ADUS)**—by reducing barriers to ADU construction, both regulatory and financial.
- C. **Financial Incentives for Rapid Development of Attainable Housing**—through programs such as an expanded Multi-Family Tax Exemption.
- D. **Administrative Reform and Resources for Rapid Development of Housing**—including streamlining and prioritization of permit applications for housing development.
- E. **Additional Support of Rental Housing Market**—through efforts to support background/credit checks, legal services, code enforcement, and short-term rental tracking.
- F. **Housing Equity Strategies**—through efforts to categorize, understand, and mitigate historic inequities in housing development and rentals (i.e., ‘redlining’).

The Implementation Plan then provided the following specific actions intended to rapidly increase housing diversity and availability in the city, summarized in **Table 5** below. The following table includes only those actions that directly relate to comprehensive planning, zoning, and codes as they relate to housing development. Many more actions were included in the Implementation Plan, but they are not included here because they relate more to legislative actions, code enforcement, and financial support programs like multi-family tax exemption (MFTE), which are outside the scope of this study. Likewise, actions calling for consideration of various Transit-Oriented Development concerns have been omitted from this list because they are currently being addressed under separate City studies and plans.

Table 5 Summary Strategies and Specific Actions, Council Implementation Plan

Number	Primary Text	Status/Effect (In Brief)
II	Policies to Adopt Outside the Plan Commission Process in Title 17 of the SMC.	
II-1	<i>Enact an emergency interim official control ordinance expressly allowing for up to four units attached in any residential zone along with necessary modifications to land use dimensional standards to accommodate these enhanced housing options.</i>	<ul style="list-style-type: none"> • This action was completed by adoption of the Building Opportunity and Choices for All interim ordinance.
III	Policies to Adopt Using the Plan Commission Process required by Title 17 of the SMC.	
III-1	<i>Remove off-street parking requirements for residential units established in Centers and Corridors and within ½ mile.</i>	<ul style="list-style-type: none"> • This action was partially completed by recent amendments to ADU regulations.

Number	Primary Text	Status/Effect (In Brief)
		<ul style="list-style-type: none"> This could be considered for application to other housing types as part of phase II of the current project.
III-2	<p><i>Ease ADU requirements by providing for administrative waiver of off-street parking on blocks not currently congested, remove the owner-occupancy requirement, and allow sale after seven years of occupancy, retaining conditions preventing ADUs from being used as short-term rentals.</i></p>	<ul style="list-style-type: none"> Some of these changes have already been made to ADU requirements. A waiver based on current congestion has not yet been explored.
III-3	<p><i>Update the definition of RSF zoning to expressly include duplexes with RSF design to express the architectural and urban design qualities of low-density neighborhoods guided by Comp Plan LU 1.3.</i></p>	<ul style="list-style-type: none"> This action will be considered as part of the current project.
III-4	<p><i>Implement a three-year pilot project to allow triplex and fourplex units in RSF zoning built to express the architectural and urban design qualities of low-density neighborhoods per Comp Plan LU 1.3</i></p>	<ul style="list-style-type: none"> The interim ordinance complies with this for one year. A longer-term implementation of this action is to be considered as part of the current project.
III-5	<p><i>Permit multiple attached residential units (including stackable townhouses and condominiums), up to six per parcel, within compact and two-family residential zoning, but retain 35-foot wall height limits with some allowance for higher roofs, and historical overlay design standards if applicable, within 1/2-mile of Centers and Corridors.</i></p>	<ul style="list-style-type: none"> The interim ordinance complies with this for one year. A longer-term implementation of this action is to be considered as part of the current project.
III-8	<p><i>Seek prompt re-evaluation by the Plan Commission of SMC 17C. 11 0.200.F to relax public street frontage requirements to allow alley access and ease of creating pocket developments to support the goal of denser residential development within residential zones while reasonably preserving other goals of desired streetscapes.</i></p>	<ul style="list-style-type: none"> This action is to be considered as part of phase II of the current project.
III-9	<p><i>Seek prompt re-evaluation by the Plan Commission of SMC 17C. 11 0.200 and Table 1 7C. 11 0-3 to consider reductions of minimum lot size and width, maximum building coverage and floor area coverage to support the goal of denser residential development within residential zones and a reasonable version of other goals of these provisions.</i></p>	<ul style="list-style-type: none"> The interim ordinance complies with this for one year. A longer-term implementation of this action is to be considered as part of the current project.
III-10	<p><i>Seek prompt re-evaluation by the Plan Commission of SMC 17C.11 0.200.C and Table 1 7C. 11 0-3 to ensure that future transition standards are consistent with the City's goal of increasing density by using smaller parcels while preserving other reasonable goals of these requirements.</i></p>	<ul style="list-style-type: none"> Transition standards have been amended per this recommendation.
III-11	<p><i>Review LUI.3 an L UI.4 for consistency with E2SHB 1220 (WA Leg 2021) requiring that planning counties under the WA Growth Management Act (GMA) update comprehensive plans to increase housing options that accommodate all levels of affordability, address historical exclusionary zoning practices, and establish anti-displacement strategies;</i></p>	<ul style="list-style-type: none"> The action is an essential component of Phase I of the current project.

Number	Primary Text	Status/Effect (In Brief)
III-12	<i>Amend the Comprehensive Plan to explore requiring, rather than merely encourage, the availability of affordable housing choices for families at all income levels in every neighborhood.</i>	<ul style="list-style-type: none"> The action is an essential component of Phase I of the current project.
III-13	<i>Add a goal to create "15-Minute Walkable Neighborhoods" throughout the City to both the Comp Plan and the Spokane Municipal Code.</i>	<ul style="list-style-type: none"> This action has not yet been considered but could be a component of Phase I of the current project. A second opportunity to address this goal (as it applies to much more than just housing choice) is to address this desire during the required 2026 Comprehensive Plan Update.
III-15	<i>Create design, light, noise and other protections for existing serviceable housing, especially those with historic significance consistent with Comp Plan DP 2.6, 2.7, 2.12, and 2.21.</i>	<ul style="list-style-type: none"> This may be a component of Phase II of the current project.

VI. Mayor’s Proclamation of a Housing Emergency

On the same day that the Spokane City Council adopted resolution 2021-0062 (Housing Action Plan), Spokane Mayor Nadine Woodward issued a proclamation that “there exists a housing emergency” and directed various actions and recommendations for the City to undertake in response to it. The Mayor’s proclamation stated that the recommendations should be undertaken with the following goals in mind:

- *Explore and expand allowed housing types to encourage missing middle housing through Spokane’s neighborhoods.*
- *Reduce overall development costs and target efforts to increase the development of affordable housing through the City.*
- *Shorten the development cycle and reduce municipal barriers.*
- *Keep vulnerable populations housed.*

The Mayor’s recommendations and actions were largely focused on specific changes to administrative procedures, staffing, and the development of certain economic incentive programs towards increasing and easing residential development in the City. However, one recommendation pertains directly to housing diversity as it relates to the City’s municipal code. The following action was recommended in the proclamation, “in addition to or in support of the complimentary Council considerations:”

- b. Consider amending SMC 17C “Land Use Standards” to increase the number of attached residential units to greater than two outside of a Planned Unit Development (PUD) with appropriate and complimentary dimensional standards, parking standards, setbacks, site coverage, and frontage requirements in place.
- i. Explore the use of Interim Zoning Ordinances to achieve immediate goals and objectives, such as allowing duplexes to be constructed on corner lots in the RSF & RSF-C zones and increased densities at transit stops, street frontage requirements

VII. Plan Commission Recommendation Memo

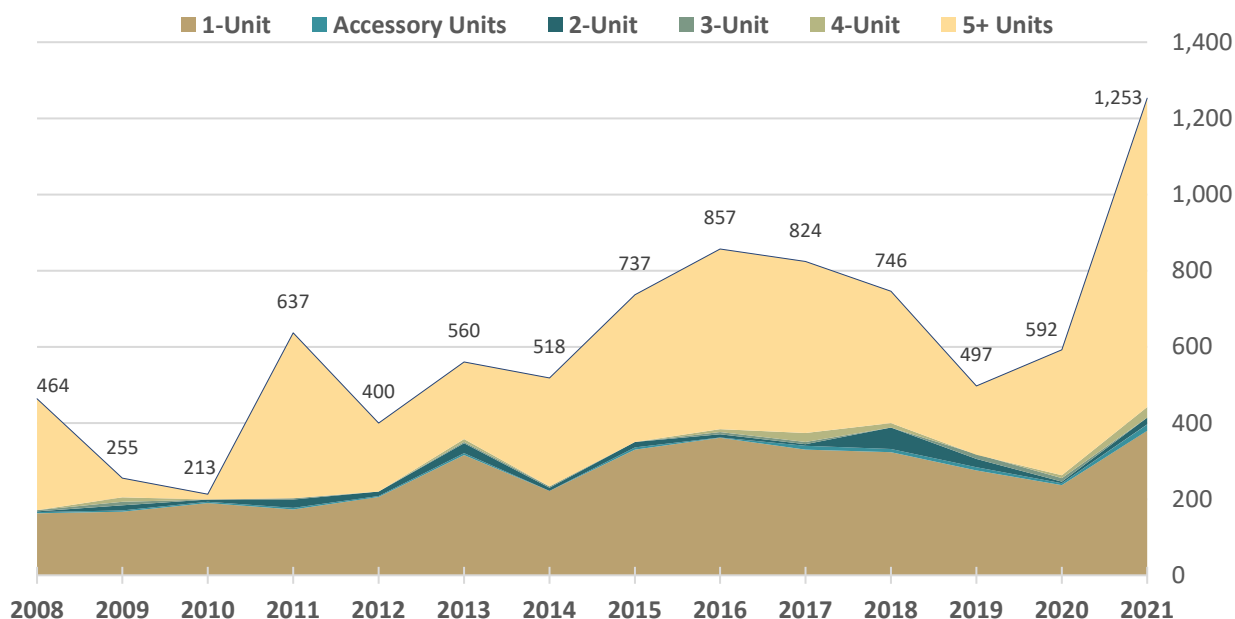
At their December 8th, 2021, meeting, the Spokane Plan Commission entertained a motion by the Plan Commission Vice President to request the City Council initiate a review of policies LU 1.3 and LU 1.4 to “facilitate an increase in

housing options in the City’s residential zones.”⁵ This request acknowledged that the process might take more than a year and would likely necessitate a Comprehensive Plan Amendment for Chapter 3, Land Use, with possible review and amendments to other chapters. The Building Opportunity for Housing project is, in part, a result of that request.

VIII. Permit History

Since 2008, the City has predominantly permitted mostly single-family homes and large (5+ unit) residential buildings. The following chart (Figure 3) provides the various densities of residential development (in units per structure) since 2008.

Figure 3 Dwelling Units Permitted by Units per Structure in the City of Spokane



Source: City of Spokane Permit Data, as reported to WA Office of Financial Management

It is clear from the recorded permits issued by the City that an extremely low proportion of missing middle units have been constructed in the City in the last 14 years. However, it remains unclear the exact degree to which *demand* plays a part in the resulting number of 2-, 3-, and 4-unit structures. Currently 60% of all land in the city, not including rights-of-way such as streets, is limited to only one housing type. Residentially zoned lots that allow for more housing types only comprise 8 percent of all such lands.⁶ This and other factors point to a possible imbalance between the intent and vision of the Comprehensive Plan and the implementation of that vision via the municipal code.

Of additional consideration, out of 107 Comprehensive Plan Amendments adopted since 2003, only seven modified the land use plan map designation of one or more parcels to a residential designation that would provide for missing middle housing types (Residential 10-20 or Residential 15-30). A further three applications for residential density supportive of missing middle are under consideration this year—though only one of those is likely to result in any missing middle housing types according to the stated intent of the applicant.⁷

⁵ Memo to City Council from Plan Commission (2022, February 9).

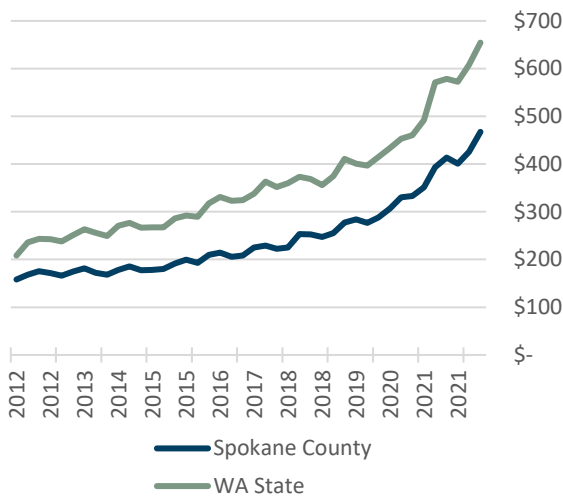
⁶ City of Spokane, Geographic Information Systems.

⁷ <https://my.spokanecity.org/projects/2021-2022-proposed-comprehensive-plan-amendments/>

IX. Economic Indicators

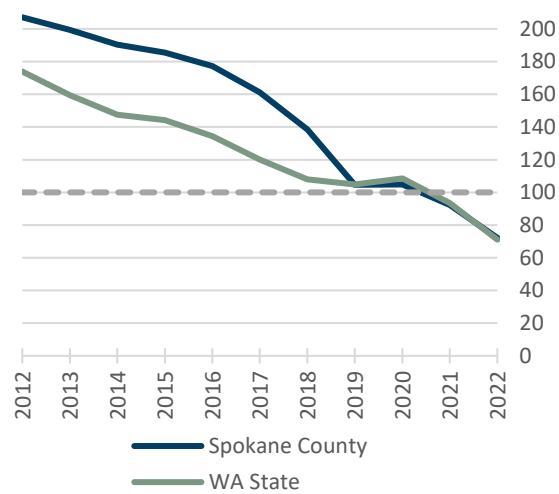
Adding to the overall economic and development picture in Spokane is the research provided by the Washington Center for Real Estate Research (WCRER). Numerous factors are tracked by WCRER, under contract with the Washington State Department of Commerce, including insight into the health of the housing and rental markets throughout the state. As shown in **Figure 4** (below), the median home price in Spokane County remains lower than the State overall but has risen precipitously in the last decade. Of similar concern is the housing affordability index (HAI), shown in **Figure 5** (also below). An HAI value of 100 indicates generally that a median-income family can afford to purchase a median-priced home. However, since 2020 the State and Spokane County have fallen below that point. Compared to a decade ago, affordability has seen a worrisome decline. Where Spokane County used to be more affordable than the State overall, the County now closely tracks the rest of the State.

Figure 5 Median Home Price in Spokane County and Washington State (in \$1,000s)



Source: WCRER, 2022

Figure 4 Housing Affordability in Spokane County and Washington State

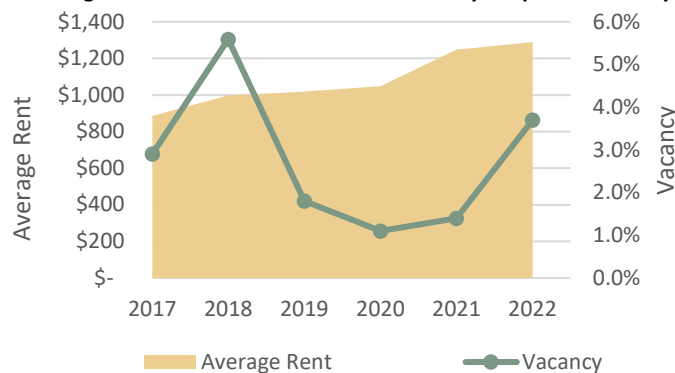


Source: WCRER, 2022

Notes: An affordability of 100 generally indicates that a median-income family can afford a median-price home.

Because home purchases are not the only viable or desired solution for housing, the rental market also provides key insights into the topic of housing. Once again, WCRER provides various indicators on the rental market. Two of these, the average rent and vacancy rate, are shown in the **Figure 6** (below). While vacancy rates have begun to rise, a positive sign, they remain very low in Spokane County. This is contributing to high rental costs, as shown, which have steadily risen in recent years.

Figure 6 Median Rent and Rental Vacancy in Spokane County



Source: WCRER, 2022

X. Summary Analysis

A summary analysis of the various vision statements in the Comprehensive Plan as well as Goals and Policies in the chapters described above makes it clear that the Comprehensive Plan overall calls for varied and diverse housing options in every neighborhood, not just within certain zones or dense nodes. However, it appears that either the text or application of two policies, LU 1.3 and LU 1.4, are somewhat inconsistent with this overall vision for housing diversity everywhere in the City.

Two of those policies, LU 1.3 and LU 1.4, are informed heavily by the focused growth strategy in the Comprehensive Plan. Focused growth, commonly called “Centers and Corridors,” is the fundamental strategy for Spokane’s physical, economic, and social development. Codified through policies under Land Use Goal 3 (see **Table 1** above), the Centers and Corridors strategy directs growth to specific mixed-use nodes in the City. Those that are aligned with transportation (i.e., an arterial street) are known as Corridors while those clustered into a specific area are called Centers. The intent of this strategy is to:

- Bring employment, shopping, and residential activities into shared locations;
- Encourage economic activity through new development and rehabilitation; and
- Make Spokane a dynamic and healthy urban center.

Accordingly, Policy LU 1.3 leans heavily towards establishing single-family detached housing as the primary land use everywhere except designated Centers and Corridors. Accordingly, Policy LU 1.4 focuses all higher-density residential uses either within or in the immediate vicinity of Centers and Corridors. What is unclear is the relationship of these two policies to missing middle housing types, those of 2-, 3-, and 4-unit dwellings. Does a triplex constitute “higher density residential?” Does a duplex? These questions are unanswered by the policy language currently in the Comprehensive Plan.

In addition to the question of middle-range housing options, Policy LU 1.3 and Policy LU 1.4 presuppose that the Centers and Corridors designated in the Comprehensive Plan (24 in total) have sufficient capacity, demand, and support to contain enough of these ‘higher density residential uses’ to meet demand in the City of Spokane. A focused growth strategy also requires that the regulatory, political, and policy environment is sufficiently supportive of higher densities in these locations to accommodate the necessary load of residential growth.

Given the known development history and policy framework discussed above, it appears implementation of the current growth strategy in Spokane is not sufficient to meet the needs of Spokane residents. This is indicated not only by the lack of housing diversity in recent development, but also key economic factors for housing affordability (see **Figure 4, 5, and 6**). Furthermore, when continually decreasing housing affordability in the City, rising median rents, and extremely low rental vacancy rates are considered, the perceived lack of policy/code support for missing middle development throughout the City seems contrary to the constellation of policies in the Comprehensive Plan calling for greater housing diversity in all part of the City. In short, there is clear opportunity for improvement.

XI. Recommended Action

The following recommendations are provided to help inform and shape the discussion and analysis moving forward, specifically as they relate to the Building Opportunity for Housing Project. However, the specifics of these actions, the actual amendments to be made, must be worked out further through engagement with the community and key stakeholders. These are not fully detailed actions, but the following recommendations provide goals to achieve, with an eye towards informing topics that engagement should address.

1. Develop amendments to Policies LU 1.3 and LU 1.4 with the following goals in mind:

- a. Clarify the relationship with and allowance for low- and mid-range density housing types throughout the city, as called for in the Comprehensive Plan;
 - b. Allow for greater flexibility and lower procedural/regulatory barriers to missing middle housing types.
2. In addition to changes to LU 1.3 and LU 1.4, the land use designations described in Chapter 3 should be considered for update and amendment as well, including the density ranges discussed in the land use description table (**Table 2** in this document).
3. Review and amend Land Use Plan Map types and designations for residential uses in the city, with a mind towards lessening the hard limit/focus on density while increasing the diversity of residential types throughout all neighborhoods.
4. As amendments are crafted, review other policies/chapters to ensure that any solutions identified maintain the internal consistency of the Comprehensive Plan.

Because there is a significant level of support already in the Comprehensive Plan for diverse neighborhoods containing a mix of housing types and densities, it is unlikely that more significant changes to the Comprehensive Plan would be necessary to meet the objectives of the Building Opportunity for Housing project. However, to ensure that the internal consistency of the Comprehensive Plan is maintained, a review of other policies and sections should be undertaken as well.