City of Spokane

South Logan TOD

Final Environmental Impact Statement

November 2023

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Fact Sheet

PROJECT TITLE: South Logan Transit-Oriented Development Project

PROJECT DESCRIPTION: The City of Spokane is planning for mixed-use and walkable places along the Spokane Transit Authority (STA) City Line, Spokane's first Bus Rapid Transit route. The South Logan Transit-Oriented Development (TOD) Project will create a focused vision for the South Logan area of the Logan Neighborhood to support more connectivity for the community, businesses, and organizations. The City is proposing to adopt a Subarea Plan, associated development regulations, and a Planned Action ordinance. The Planned Action (RCW 43.21C.440), is used to facilitate future growth by streamlining the environmental review for projects that are consistent with the Subarea Plan. The outcome will be a plan and policies, based on community vision, providing a coordinated framework for the South Logan area. The project is expected to have final adoption by City Council anticipated in late 2023.

PROJECT LOCATION: The study area is focused up to ½ mile around three City Line Stations in the South Logan area of the Logan Neighborhood: McCarthey Athletic Center Station, Desmet Station, and Columbus Station. This area is also part of the University District and includes the Hamilton Street corridor, Gonzaga University, the University of Washington School of Medicine-Gonzaga University Partnership, other higher education and institutional organizations, Mission Avenue Historic District, local businesses and organizations, Mission Park, and the Spokane River. Several trails also connect to and through the subarea, such as, the Centennial Trail which generally crosses from east to west, the Ben Burr trails which comes from the south and connects the South Hill to the University District before connecting to the Centennial Trail, and lastly, the Iron Bridge connection from the east.

PROJECT PROPONENT: City of Spokane

PROJECT SCHEDULE:

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Public Workshop: May 18, 2023

Preferred Alternative: June 2023

Final Subarea Plan & FEIS: November 2023

Public Hearings: December 2023

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1 Executive Summary

This chapter summarizes the findings of this Final Environmental Impact Statement (FEIS) with respect to environmental impacts, mitigations measures, and potential impacts for the Preferred Alternative for the proposed action to implement the South Logan Transit-Oriented Development (TOD) Subarea Plan in the study area. The FEIS considers a Preferred Alternative as compared to the three Action Alternatives evaluated in the Draft EIS (DEIS):

This summary provides a brief overview of the information considered in this FEIS. Chapter 2 contains detailed information on the Preferred Alternative and Chapter 3 contains detailed information on the existing conditions, environmental impacts, and mitigation measures for each element of the environment.

1.1 Proposal

The City of Spokane is planning for mixed-use and walkable places along the Spokane Transit Authority (STA) City Line, Spokane's first Bus Rapid Transit (BRT) route. The new City Line provides fast, reliable connections for South Logan to other key centers such as Spokane Community College and the downtown area. The South Logan TOD Project will create a focused vision for the South Logan area of the Logan Neighborhood to support more connectivity for the community, businesses, and organizations. The South Logan TOD study area is shown on Figure 1. The City is proposing to adopt a Subarea Plan, associated development regulations, and a Planned Action ordinance. The Planned Action (RCW 43.21C.440), is used to facilitate future growth by streamlining the environmental review for projects that are consistent with the Subarea Plan. The outcome will be a plan and policies, based on community vision, providing a coordinated framework for the South Logan area. The project is expected to have final adoption by City Council anticipated in the fall of 2023.

1.2 Objectives and Planning Context

The South Logan study area is approximately 279 acres in the central portion of the City of Spokane, immediately north of the Spokane River. It has a mix of uses, including Gonzaga University (Gonzaga) and student housing, athletic facilities, manufacturing and warehouses, retail and restaurants, small-scale apartments, and detached single-family homes. Generally, the study area is developed less densely than what would be permitted under the current comprehensive plan and zoning. Areas with the land use plan map designation of General Commercial (GC) largely contain single-story warehouse buildings, while the Center and Corridor (CC) Transition land use is mostly detached single-family homes. The CC Core land use areas are developed to a smaller scale than could be permitted under current regulations. Conversely, the Residential Low designated land use areas exceed the designated density, with a significant number of legal, nonconforming multi-family structures found throughout the neighborhood.

In a TOD, land use and transportation are integrated with a transit route at its core where a mix of housing, commercial businesses, jobs, and services are concentrated along walkable and bikeable streets within ¼ mile of the transit route. TOD meets market demands for mixed-use, walkable development in urban areas such as the Spokane Transit Authority's (STA) high frequency transit corridors.



1.3 Preferred Alternative

The Preferred Alternative balances opportunities for transit-oriented development, investments in public improvements and careful consideration of historic areas. It maximizes housing and development potential around BRT stations via a mix of upzones and public improvements and seeks to improve mobility within the subarea and to other parts of the city through investments in multimodal connections.

1.4 Summary of Impacts and Mitigation Strategies

1.4.1 Land Use

1.4.1.1 Potential Impacts

The land use and zoning changes proposed for the Preferred Alternative are similar to Alternative 4: TOD Emphasis, with increases in building heights and intensity in the areas in proximity to the BRT stations. The Preferred Alternative proposes a 75' height limit for the RHD zone instead of 70', that was proposed in the DEIS, to accommodate seven-story buildings. The changes to intensity and scale are greatest within the core of the South Logan study area focused along the Hamilton Street Corridor and the southeast riverfront, with less change at the edges as it transitions to the north. The Preferred Alternative changes the GC designations to CC and retains the existing height limit in those zones.

The Preferred Alternative would provide several benefits by improving public infrastructure, such as green streets and investment in main street improvements. It also allows for higher density housing near walkable and transit-oriented areas, which is consistent with the policies in the Comprehensive Plan and the guidance in the Spokane Housing Action Plan.

The Preferred Alternative would result in a similar amount of mixed-use intensification within the shoreline zone as Alternative 3: Southeast Riverfront from the DEIS. Any proposed development or redevelopment within the shoreline zone would be required to comply with the current SMP policies and regulations, as well as undergo additional evaluation for potential impacts to shoreline functions and the Spokane River.

1.4.1.2 Mitigation

The City of Spokane may choose to update zoning and design regulations in applicable areas, such as where zones transition from higher to lower height limits, to further assist in mitigating the impacts of larger scale development and meet community design objectives.

1.4.2 Housing and Anti-Displacement

1.4.2.1 Potential Impacts

1) Housing Capacity

Housing production may occur throughout the study area on parcels close to the transit stations and where conditions are most favorable to development. Upzones and the removal of parking minimums within ¼ mile of BRT stops will encourage development and help reduce development costs. Major redevelopment is most likely on larger parcels such as are found in the SE commercial/industrial area. Smaller parcels, as found in the older residential areas north of Gonzaga University and around Mission Park, are more expensive to redevelop, so overall infill may be limited even in areas where allowed heights are increasing significantly. Minor upzones in



the Mission Avenue Historic District will discourage extensive development in that area relative to other parts of the subarea.

2) Business Displacement

The Preferred Alternative may see business displacement along the Hamilton Street Corridor north of Boone Avenue if properties there are redeveloped. In particular, retail businesses that are tenants and rent commercial spaces may be at risk for displacement. However, broad upzones in residential areas in the Preferred Alternative mean that a large share of parcels that redevelop may be located in residential rather than commercial areas, mitigating displacement pressure on existing businesses. The proposed streamlined Hamilton FBC and Centers and Corridors zoning will encourage mixed-use development with a pedestrian-oriented, ground floor activation that could continue to support ground floor retail, ensuring a long-term supply of commercial spaces and potentially tempering rent pressure on other existing businesses. There is also some risk of business displacement in the SE area, where redevelopment is likely.

3) Residential displacement

Non-student, low income populations and elderly populations have an elevated risk of displacement due to redevelopment. With few owner-occupied housing units, most residential properties that redevelop will displace some renters temporarily if not permanently.

The Preferred Alternative may see residential displacement most similar to Alternative 4: TOD Emphasis. Some older houses in the northern residential area may redevelop, resulting in higher rents or sale prices. However, increased opportunities for student housing in and around the Gonzaga campus may alleviate pressure on market rents in remaining properties, reducing pressure on non-student renters.

1.4.2.2 Mitigation

- Expand upon anti-displacement research A displacement risk mapping tool that builds on the displacement risk assessment in the Spokane Housing Action Plan would help identify and monitor the highest-risk areas in Spokane.
- Address Displacement in the Spokane Comprehensive Plan Identify anti-displacement research and policymaking as a priority for the 2026 periodic comprehensive plan update.
- Community Engagement Engage early and often with neighborhood stakeholders to ensure all voices are heard.
- Public Development Authority ("PDA") Ensure South Logan is in continuous dialogue with the University District Partnership ("UDPDA") and is engaged on any significant new development projects.
- Flexibility for Ground Floor Retail Requirement Flexible ground floor standards that permit but do not require retail, or require a smaller portion of the ground floor, would allow opportunities for retail to flourish in the right locations without also creating an impediment to new housing construction.
- Tax Increment Financing ("TIF") Utilize Tax Increment Financing (TIF) to make development on sites constrained by upfront infrastructure costs more feasible.
- Reduce or Eliminate Minimum Parking Requirements Use developer incentives, such as additional height allowance, to reduce or eliminate parking requirements.
- Facilitate Public-Private Partnerships ("PPP") Cultivate partnerships with institutional stakeholders, along with key private sector stakeholders, in support of business, community, and economic



development in South Logan. Explore partnerships with Community Development Financial Institutions (CDFIs) that provide capital in support of affordable housing. Explore private sector partnerships with dominant employers in the area.

1.4.3 Transportation

1.4.3.1 Potential Impacts

1) People Who Walk, Bike, or Roll

Active transportation improvements in the Preferred Alternative include crossing improvements along N Hamilton Street and better connections to frequent transit. Improvements include an upgraded crosswalk at the intersection of N Hamilton Street/Springfield Avenue and an at-grade crossing for the Centennial Trail close to the City Line McCarthey Athletic Center Station. Anticipated increases in residential and commercial development intensity are expected to drive a mode shift towards walking, bicycling, and public transit, reducing reliance on single-occupancy vehicles. Pedestrian improvements, including redesigned intersections, may influence traffic circulation and freight movement.

2) Public Transportation

City Line BRT provides increased transit service throughout South Logan, connecting residents and visitors to destinations. Proposed land use and transportation infrastructure modifications in the Preferred Alternative will support increased ridership of City Line BRT.

3) Roadway Facilities and Vehicular Travel

The Preferred Alternative is anticipated to generate approximately 928 new PM peak hour vehicle trips as a result of proposed land uses in South Logan. A traffic analysis indicates that the N Hamilton Street/E Trent Avenue intersection will experience a Level of Service (LOS) E in the 2045 No Action Alternative and a LOS F in the Preferred Alternative scenario.

1.4.3.2 Mitigation

The intersection of N Hamilton Street/E Trent Avenue is forecasted to operate at LOS E during the 2045 No Action and LOS F during the Preferred Alternative. Changes to signal timing would improve level of service to LOS E for the 2045 Preferred Alternative. It is recommended that as mitigation, the City of Spokane monitor the signal at the intersection of N Hamilton Street, E Trent Avenue, and the I-90 ramp and make adjustment to the signal timing as needed to accommodate future development in the area.

The Preferred Alternative includes improvements for bicycling and pedestrian infrastructure intended to provide improved mobility options, reduce conflict points with vehicles, improve safety performance, increase connectivity of the walking and bicycling network, and improving access to transit for people walking, bicycling, and rolling. The proposed changes are not expected to have lasting negative effects on current bicycle and pedestrian facilities or transit service, thus no further measures are necessary.



1.4.4 Air Quality

1.4.4.1 Potential Impacts

The estimated increase in vehicle traffic due to population growth is not expected to significantly affect air quality in the area. The implementation of TOD would create a more walkable neighborhood with convenient access to STAs high-frequency transit service. It is likely that transit ridership within the study area will increase over time as redevelopment occurs, thus offsetting the increase in general purpose traffic, at least in part, from population growth.

The proposed changes for the Preferred Alternative focus on enhancing neighborhood connections and livability. There would be an estimated population increase of 6,735, which would contribute to traffic congestion and emissions. However, the Preferred Alternative includes priorities for multi-modal improvements, traffic calming, and streetscape improvements, as well as TOD, which would, in part, offset the impacts from additional traffic. In addition, the proximity to the City Line creates enhanced public transit options in the study area that would be expected to reduce private vehicle usage and traffic. The proposed zoning changes would encourage development of additional housing and mixed-use properties, which are not typically major contributors to air quality issues.

1.4.4.2 Mitigation

Construction best management practices (BMPs), such as fugitive dust control and regular equipment maintenance, would be required to be implemented for all projects proposed under the Subarea Plan, as required by the SRCAA. Those requirements are expected to mitigate any potential impacts to air quality from construction activities.

Mitigation strategies for intensification of uses could include the requirement for developments to include additional landscaping and open green spaces. The City may also consider prioritizing multi-modal facilities as capital improvements planned for the area.

1.4.5 Water Resources and Water Quality

1.4.5.1 Potential Impacts

With the enhanced multi-modal connectivity and streetscape improvements, there would be opportunities for implementation of green infrastructure, especially along Hamilton Street. Given the City's implementation of policies and requirements for wastewater and stormwater treatment, the projected population increase is not expected to have significant water quality impacts.

The Preferred Alternative would result in mixed-use intensification within the shoreline zone. Any proposed development or redevelopment within the shoreline zone would be required to comply with the current SMP policies and regulations, as well as undergo additional evaluation for potential impacts to shoreline functions and the Spokane River.

1.4.5.2 Mitigation

Construction BMPs would be required for all construction projects and include measures such as maintenance of construction equipment and street sweeping, which can reduce temporary stormwater pollution and other water quality impacts.



1.4.6 Biological Resources and Critical Areas

1.4.6.1 Potential Impacts

The Preferred Alternative would increase intensity in the areas surrounding Hamilton Street and in the northern residential area. With the enhanced multi-modal connectivity and streetscape improvements, there would be opportunities for implementation of green infrastructure, especially along Hamilton Street and Springfield Avenue. The Preferred Alternative could increase the amount of vegetation and habitat for urban species in those areas as individual projects are implemented. The Preferred Alternative is not anticipated to have significant adverse impacts on biological resources or critical areas.

1.4.6.2 Mitigation

For all development proposed with implementation of the Subarea Plan, individual projects would be required to comply with the current stormwater, critical areas, shorelines, and other development regulations.

1.4.7 Environmental Health

1.4.7.1 Potential Impacts

Temporary construction impacts, with increased development and redevelopment, would be spread out over many years; however, temporary impacts from construction noise, dust, and traffic could have a greater effect on the South Logan study area due to the high risk for environmental health disparities. The specific effects would depend on the amount, duration, and type of construction activities.

Future growth could result in more people living near mobile and stationary sources of air toxics and particulate matter PM_{2.5}. The impact of the Preferred Alternative is that it would increase the potential number of people, or other "sensitive receptors" located near existing sources of harmful air pollutants.

The Preferred Alternative includes priorities for multi-modal improvements, traffic calming, streetscape improvements, and a significant increase in housing and focuses on enhancing neighborhood connections and livability. These changes, supporting increased access to transit and infrastructure upgrades, would benefit the environmental health of residents in the neighborhood. The availability of community services would likely increase proportionally to the population growth expected under the Preferred Alternative.

1.4.7.2 Mitigation

To mitigate the potential environmental health impacts from temporary construction activities, the City could require enhanced public outreach to the community to inform them and seek input on projects as they are implemented. Outreach could include:

- Public open houses to provide project information and access to city staff.
- Translation of informational materials into other languages, as needed.
- Providing alternative methods of information distribution, such as through community and service organizations, libraries, schools, employers, and transit agencies, as well as the standard electronic methods (website, email, social media, etc.).

Enhanced construction BMPs would also help reduce environmental health impacts, such as additional street sweeping to keep dust and debris from being tracked onto roadways, required emission controls on construction



equipment, and limited hours for construction near schools, parks, residences, and other noise sensitive receivers.

1.4.8 Aesthetics, Light and Glare

1.4.8.1 Potential Impacts

Where changes in zoning allow building up to 150 feet, it is unlikely that future development will rise above seven or eight stories due to market dynamics, limiting the visual impact of new development adjacent to lowerintensity zones. Gradual replacement of manufacturing uses with residential, retail, and office uses in the southern part of the study area will likely reduce the impact of light and glare over time. Updates to development regulations and design standards can encourage quality development that adds to neighborhoods' livability and overall aesthetics.

The Preferred Alternative would result in new construction throughout the study area with the most significant changes happening in the SE Industrial area and along Hamilton Street. In some places, the Preferred Alternative would increase allowed heights to 75 feet, where the action alternatives only included heights of 70 feet. This change could result in a impacts to aesthetics, although the overall impact is still not significant.

Areas currently zoned R1 and R2 would be rezoned to allow multi-family buildings, likely resulting in scattered redevelopment of buildings that are taller, bulkier, or have greater lot coverage than what is allowed under current zoning. In these areas, gradual infill construction may result in increased shade and changes to the local aesthetic landscape for some properties that are adjacent to new development. Investments along N Columbus Street would improve the quality of the streetscape, which currently lacks consistent street trees, planting strips, sidewalks, or other pedestrian amenities south of Cataldo Avenue.

1.4.8.2 Mitigation

Development that is aligned with the policies set forth in the Spokane Comprehensive Plan, Logan Neighborhood Identity Plan, design standards and, where applicable, the established design review process will have no significant aesthetic impacts to the study area. In addition, the following actions will help to mitigate any remaining minor impacts.

- Updated development regulations for Center and Corridor zones, where the greatest amount of development is expected, should include review and, where needed, updates to Center and Corridor design standards to ensure that they adequately address building aesthetics and further promote TOD principles.
- The Hamilton Form-Based Code (FBC) includes robust standards for building form and design that mitigate any aesthetic impacts of new development.
- Public investments offer opportunities to enhance aesthetics in the area, including access to views, and appropriate transitions. The design review process, which applies to public projects and projects in the public right of way will help achieve concurrence with design goals in adopted plans.

1.4.9 Recreation

1.4.9.1 Potential Impacts

With a projected population increase of 6,735 by 2047 under the Preferred Alternative, the study area will have a deficit of over 53 acres of total parkland. Even with Mission Park's 13 acres, the study area anticipates a small



deficit of neighborhood parkland (1 acre) by 2047. With Mission Park being the only publicly developed park space, the study area currently falls short of the city-wide level of service for total park acreage and would only get worse under the Preferred Alternative. Given the study area's urban nature and fixed boundary, meeting that standard will be increasingly unrealistic.

Development under the Preferred Alternative would enhance connectivity, particularly across Hamilton, and improve access to Mission Park from the larger study area. It also proposes to study options for improving river crossings for bicycles and pedestrians in the vicinity of Mission Park. This includes enhancing the connection along Mission Avenue or constructing a new walking/biking/rolling bridge at Sharp Avenue.

An increase in allowed intensity around Mission Park and surrounding the Centennial Trail east and west of Columbus Street may create more "eyes on the park and trail" to provide some safety benefits. Similarly, the increase in intensity will likely increase use of both Mission Park and the Centennial Trail, possibly bringing some park facilities to capacity more often and creating more trail user conflicts.

1.4.9.2 Mitigation

Public investments offer opportunities to enhance recreational uses in multiple locations in the study area, most notably at Mission Park.

- Park improvements could include the integration of new facilities, upgrades to existing facilities, and new programming activities to encourage and accommodate more daily and event-based park usage and increase public safety.
- The generous Centennial Trail right-of-way also offers opportunities to add physical and visual amenities to encourage more trail use and enhance the setting for complementing private development adjacent to the trail.
- Public streetscape improvements are another opportunity that can both improve access to the park, trail, and riverfront and make the street function, in some special cases, as a recreational asset (the planned Columbus Street improvements in Alternative 3 are an example).

There is potential for several public/private partnerships to enhance study area recreational opportunities:

- Alternative 3 emphasized the opportunity for public/private partnership developments, particularly in the riverfront area with large parcels/property ownerships. Such developments often have better opportunities of incorporating public plazas or pocket parks that are directly integrated into the development. The public side of the investment could come in a variety of forms, including streetscape improvements, or shared investment in park/plaza space.
- Considering the large area of public ownership on either side of the Centennial Trail and development potential on private parcels fronting the trail, there is tremendous potential for a public/private partnership in expanding the recreational amenities within the trail corridor, enhancing the context and visibility of the trail, and facilitating the desired TOD in this area.
- The riverfront properties also present an opportunity for such partnerships to provide enhanced water access and related riverfront amenities.
- Collaboration with Gonzaga University regarding the use of some of their open spaces for broader community use.



Regulatory changes that further emphasize pedestrian-oriented development might increase the likelihood of the integration of small plaza spaces, particularly near building entries, or even riverfront access/amenities. Such changes bring greater predictability to the future context and particularly with good communication with property owners and developers, could lead to the inclusion of such public amenity spaces, even if they are privately owned. While these spaces are likely to be smaller, they could still integrate a variety of small scale active and passive recreational amenities/features.

1.4.10 Historic and Cultural Preservation

1.4.10.1 Potential Impacts

Zoned capacity increases proposed in the Preferred Alternative will increase pressure for redevelopment. The combination of existing and proposed updated development and design standards will help preserve designated historic structures and ensure that new development includes some measures that help promote compatibility with the surrounding context. The Preferred Alternative aligns with the Building Opportunity in Housing ordinance design standards, adopted in November 2023, which provide an additional layer of site and building design provisions to help ensure compatibility.

1.4.10.2 Mitigation

Beyond those provisions making the interim housing ordinance permanent (including applicable multifamily design standards), additional changes to the zoning district design standards could be made to further promote design that retains and enhances the established character of the residential neighborhoods. Examples could further address façade articulation, roofline treatments, entry design, and front yard landscaping.

1.4.11 Utilities and Infrastructure

1.4.11.1 Potential Impacts

Potential redevelopment under the Preferred Alternative would result in increased demand for water and sanitary sewer by 673,500 gallons per day, based on additional residents. This is slightly higher than the range of projected demand under the Action Alternatives in the DEIS. The current water supply and sanitary sewer treatment facilities have the capacity to supply service under this scenario; however, local infrastructure supplying individual lots or blocks may need to be upgraded. In addition to city-wide improvements made during the planning period, all development would be required to provide water and sanitary sewer connections from the redevelopment to the city main lines.

1.4.11.2 Mitigation

The City could use tools to ensure that systematic stormwater drainage improvements are made at the time of small-scale infill developments in areas of informal drainage. One potential tool is to establish a latecomer agreement mechanism for sidewalk / drainage improvements. This tool would allow homeowners and builders of small-scale development projects to sign an agreement to contribute to future block-scale sidewalk / drainage improvements at the time the City is prepared to construct a block-scale improvement in the area. The tool could be combined with low-cost loan financing assistance from the City.

The Preferred Alternative would, over time, result in required changes to the existing utility infrastructure and services. The development changes in the subarea are expected to gradually occur and are not anticipated to result in significant unavoidable adverse impacts that cannot be mitigated through measures discussed above.



1.5 Significant Adverse Impacts

The South Logan study area currently has a deficit of parks and open space land and does not meet the current City level of service. That deficit would grow under the Preferred Alternative with increased population over time. Mitigation measures proposed could relieve some of that deficit but are unlikely to ever meet City standards.



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2 Project Description

2.1 Introduction

The City of Spokane is planning for mixed-use and walkable places along the STA City Line, Spokane's first Bus Rapid Transit route. The recently launched City Line is a six-mile, corridor-based route connecting Browne's Addition to Spokane Community College by way of Downtown Spokane and the University District, including through South Logan. The South Logan Transit-Oriented Development (TOD) Project will create a focused vision for the South Logan area of the Logan Neighborhood to support more connectivity for the community, businesses, and organizations. The South Logan TOD study area is shown on Figure 1.

The City is proposing to adopt a Subarea Plan, associated development regulations, and a Planned Action ordinance. The Planned Action (RCW 43.21C.440) is used to facilitate future growth by streamlining the environmental review for projects that are consistent with the Subarea Plan. A Planned Action is a development project whose impacts have been addressed by a State Environmental Policy Act (SEPA) Environmental Impact Statement (EIS) associated with this geographic area before individual projects are proposed. The plan, policies, and Planned Action ordinance will provide a coordinated framework for the South Logan area, based on community vision. The project is expected to have final adoption by the City Council anticipated in the late 2023/early 2024.

2.2 Scope of the Environmental Review

The City published a SEPA Determination of Significance (DS) on September 8, 2022. Agencies, affected tribes and members of the public were invited to comment on the scope of the DEIS, including potential project alternatives, probable significant adverse impacts, and mitigation measures. The City held a public scoping meeting on September 20, 2022. The scoping comment period ended on October 14, 2022. Potential issues were eliminated from the detailed study in the EIS based on review of existing environmental information and conclusions that projects under the Planned Action Ordinance are not likely to have a significant impact on those elements of the environment, therefore not warranting a full review under SEPA.

The DEIS was published on May 9, 2023. The potential environmental impacts of development under each alternative were analyzed in the DEIS. The alternatives included a No Action Alternative under the current Comprehensive Plan and zoning regulations, as required under SEPA, as well as three Action Alternatives. Alternative 2 (Hamilton Crossing) focused on enhancing multi-modal crossings to improve neighborhood connections and livability. Alternative 3 (Southeast Riverfront) focused investment and zoning changes in the southeast of the project area to catalyze development towards a mixed-use transit-oriented hub. Alternative 4 (TOD Emphasis) maximized the opportunities for transit-oriented development with a range of zoning changes and public improvements. Agencies, affected tribes, and members of the public were invited to comment on the environmental analysis in the DEIS. The comment period was open from May 9 through June 8, 2023.

Based on the environmental analysis of the alternatives in the DEIS, and after taking into consideration all comments received during the public comment period, the City has refined the South Logan TOD Plan and developed a Preferred Alternative. This FEIS provides an analysis of that Preferred Alternative as compared to the three Action Alternatives in the DEIS.



2.3 Planning Context

The South Logan study area is approximately 279 acres in the central portion of the City of Spokane, immediately north of the Spokane River. It has an eclectic mix of uses, including Gonzaga University (Gonzaga) and student housing, athletic facilities, manufacturing and warehouses, retail and restaurants, small-scale apartments, and detached single-family homes. Grocery stores, restaurants and service industries can be found along Hamilton Street and Sharp Avenue. The area also contains vacant and underutilized properties, including large parking lots. Generally, the study area is developed less densely than what would be permitted under the current comprehensive plan and zoning. Areas with the land use plan map designation of General Commercial (GC) largely contain single-story warehouse buildings, while the Center and Corridor (CC) Transition land use is mostly detached single-family homes. The CC Core land use areas are developed to a smaller scale than could be permitted under current regulations. Conversely, the Residential Low designated land use areas exceed the permitted density, with a significant number of legal, nonconforming multi-family structures found throughout the neighborhood.

In the southeast, Gonzaga occupies about ¼ of the subarea, generally south of Sharp Avenue and east of Hamilton Street, with a range of academic, athletic, housing, and religious buildings. Manufacturing and commercial uses are found south of the Centennial Trail, which mostly consists of one- and two-story buildings as well as some vacant gravel or paved lots. South of Spokane Falls Boulevard, the restored SIERR building and recently constructed four-story University of Washington School of Medicine-Gonzaga University Health Partnership Building (UW-GU Health Partnership) connect the neighborhood with the emerging health and science collaborations of the University District.

North of Boone Avenue, a strip of retail businesses, restaurants, and services are located along Hamilton Street, continuing well north of the subarea. A portion of this area between Desmet Avenue and a half of a block north of Augusta Avenue is covered by the Hamilton Form-Based Code, a model zoning area adopted in 2015 in close collaboration with Logan Neighborhood Council to foster a lively, walkable, mixed-use environment along Hamilton Street. The blocks surrounding Hamilton Street and Mission Avenue consist of a mix of housing types, with houses, apartments, and student dorms, mostly covered by low-intensity Residential 1 (R1) zoning.

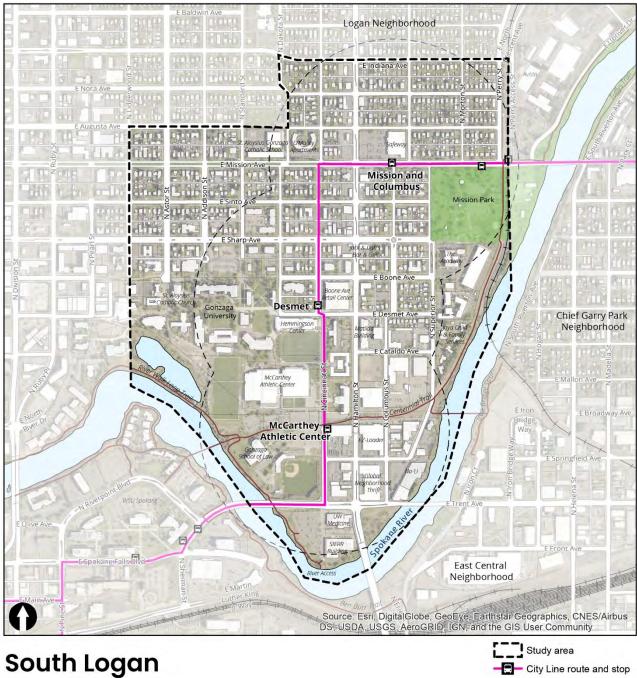
2.3.1 Transit-Oriented Development

In a TOD, land use and transportation are integrated with a transit route at its core where a mix of housing, commercial businesses, jobs, and services are concentrated along walkable and bikeable streets within ¼ mile of the transit route. TOD meets market demands for mixed-use, walkable development in urban areas such as the Spokane Transit Authority's (STA) high frequency transit corridors.

Transit also helps improve equity and affordability by taking advantage of existing infrastructure to deliver greater benefits to a diverse range of residents. Equitable TOD, or ETOD, helps ensure people experience the benefits of transit, regardless of income, race, ethnicity, age, gender, or ability. When centered on social inclusion and community wealth building, ETOD can be a driver of positive transformation for more vibrant, prosperous, and resilient neighborhoods connected to opportunities throughout the city and region and can help prevent displacement of current residents in development.

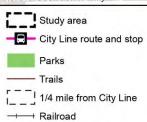


Figure 1 South Logan Context Map



South Logan Context Map

0 500 1,000 1,500 Feet





2.4 Preferred Alternative

The preferred alternative balances opportunities for transit-oriented development, investments in public improvements and careful consideration of historic areas. It maximizes housing and development potential around BRT stations via a mix of upzones and public improvements and seeks to improve mobility within the subarea and to other parts of the city through investments in multimodal connections. The plan values, which were developed through public input and reflect the guiding principles for South Logan, were used along with the results of the environmental analysis and public comments to develop the Preferred Alternative. Ultimately, the Preferred Alternative shapes the Final Plan as the preferred direction for future growth and investment in South Logan.

2.4.1 Growth Projections

To provide a framework for the environmental analysis, the growth projections shown in **Error! Reference source not found.**Table 1 and Figure 2 were used for each of the alternatives analyzed in the DEIS and the Preferred Alternative in this FEIS. Projections for local population growth by 2047 were developed based on increases in building capacity in each alternative and the effect of investments in specific areas to encourage private development. The projections provide the necessary data regarding growth and development for analysis of potential impacts. They are not intended to provide exact forecasting of development outcomes. The bulk of growth expected to occur in the subarea under all alternatives is residential. Alternative 1: No Action is based on projected growth under the existing zoning.

	Existing	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Preferred Alternative
Increase in Housing Units ¹		314	1,710	1,612	3,013	2,954
Population Increase		715	3,898	3,674	6,869	6,735
Total Population	4,676	5,391	8,574	8,350	11,545	11,411

Table 1 Projected Growth for 2047 Planning Horizon

¹ Includes equivalent housing added in college dormitories.

Population growth is based on an average household size of 2.28 persons/dwelling unit.



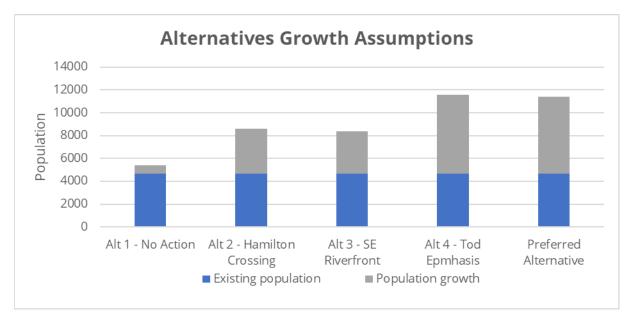


Figure 2 Alternatives Growth Assumptions

2.4.2 Land Use/Zoning Categories

The following land use/zoning categories structure the assumptions about allowed and likely development outcomes through 2047. These categories are simplifications of existing zones and/or future zones that will be developed following plan adoption.

Note: The <u>Building Opportunity and Choices for All</u> pilot program was an interim zoning ordinance adopted by Spokane City Council in July 2022 that modified residential zoning to allow for the construction of more housing in existing neighborhoods, with more variety in the types of housing permitted. As an interim ordinance, it was not a permanent change to City code and therefore was not included in Alternative 1 in the DEIS. As part of the interim ordinance's work program, the City adopted permanent changes of a similar nature, under the project Building Opportunity for Housing. The permanent housing code changes were heard by City Council in November 2023, and will go into effect at the beginning of 2024. The permanent code changes are not expected to codify the Center and Corridor regulations approved through the interim ordinance, and a separate study on the Centers and Corridors will provide recommendations for changes. Changes to the zoning have been updated to reflect the adopted citywide changes during plan finalization.

Mixed-Use – 150': Based on Center and Corridor (CC) zoning for Employment Centers (CC-EC), this category would allow residential, commercial, or mixed-use development with a height limit of 150 ft.





Mixed Use – 150 expected building type examples include midrise (5-7 stories) mixed-use and residential buildings, and office, biotech or academic buildings.

Mixed-Use – 75': This category would allow residential, commercial, or mixed-use development with a height limit of 75 ft. Existing similar zones in Spokane have height limits of 55 ft or 150 ft.



Mixed Use – 75 expected building type examples include midrise mixed-use and residential buildings.

Residential High – 55': This category primarily allows residential uses with a height limit of 55 feet and is based on the existing Residential High Density (RHD) zone.



Residential High – 55 expected building type examples include midrise and low-rise residential buildings.

Residential High – 75': This category primarily allows residential uses with a height limit of 75 feet and is based on the existing Residential High Density (RHD) zone. Residential zones (including RHD) include special provisions and design standards for educational institutions.





Residential High – 75 expected building type examples include midrise residential buildings.

Residential Medium – 40': This category primarily allows residential uses with a height limit of 40 feet and is based on the existing Residential Multifamily (RMF) zone.



Residential Medium – 40 expected building type examples include low-rise residential buildings.

2.4.3 Notable Features

The Preferred Alternative was developed based on a collective set of values drawn from the Comprehensive Plan, the TOD Framework Plan Policies, and preliminary engagement findings from this effort. Those values are:

- Enhance connectivity, accessibility, and mobility in South Logan and to the river;
- Support universities and health sciences sectors, innovation, and sustainability;
- Support job access, diverse industries, and employment;
- Expand housing options and affordability for residents of all incomes, abilities, and ages;
- Minimize residential and local business displacement; and
- Build on South Logan's unique urban context and history with integrity and diversity.

2.4.3.1 Land Use and Zoning Changes

- A. Expand high-intensity TOD zoning in the commercial/industrial areas south of Boone Ave to increase pedestrian-oriented redevelopment opportunities. This action largely consolidates the areas currently zoned GC-150, CC1-DC, and CC1-EC into a single zone, which would promote a pedestrian friendly mix of uses than the GC zone. The GC and CC1-EC zones feature 150-foot height limits, and the proposed change would provide a 150-foot height limit for the whole area.
- B. Integrate strategic adjustments to the Hamilton Form-Based code (FBC) to simplify the height limits and design standards, reduce barriers to desired redevelopment, and emphasizing pedestrian-oriented development. Apply the adjusted Hamilton FBC to the envisioned pedestrian-oriented focal point at Springfield Ave and Columbia St.
- C. Rezone to considerably increase housing capacity north of Gonzaga University from Boone Ave to Sinto Ave and allow greater flexibility for on-campus development.
- D. Rezone to considerably increase housing capacity near BRT stations around Mission Park.



- E. Transition north of Sinto Ave to lower allowed heights and intensity to reduce impacts to Mission Ave Historic District.
- F. Rezone to modestly increase housing capacity in residential areas within walking distance of BRT stations.
- G. Enact revisions and adoption of updated design standards for residential development prior to or in conjunction with zoning changes.
- H. Remove parking minimums for all uses within ¼ mile of BRT stations.

2.4.3.2 Priorities and Investments

- Enhance existing Hamilton St crossings and update streetscape plans, including redesign of Sharp Ave/Hamilton St intersection with bump-outs and other infrastructure. These improvements are critical to enhancing pedestrian access to BRT stations by enhancing pedestrian safety and comfort. Such improvements would also enhance the visual character of the corridor.
- J. Install an enhanced crosswalk at the Hamilton St-Springfield Ave intersection, like a high-intensity activated crosswalk (HAWK) signal or full traffic signal, to function both as the at-grade ADA-compliant Centennial Trail crossing of Hamilton St and help to facilitate desired transit-oriented development on adjacent and nearby properties. The type of enhancement would be determined by further study.
- K. Maximize riverfront connections, open space improvements, and access. These improvements are supported by the Spokane Parks and Natural Lands Master Plan. The riverside context of this area is one of the primary character-defining features and important to the livability of the area as a vibrant transit-oriented development district.
- L. Invest in green street improvements on Columbus St between Mission Ave and Desmet Ave. Green street improvements typically include wayfinding signage, traffic diverters, crossing improvements, and green stormwater infrastructure (GSI). Such improvements would enhance the environmental quality and visual character of the neighborhood plus contribute to the setting for desired transit-oriented development.
- M. Invest in main street improvements on Columbus St between Desmet Ave and Trent Ave. Main Street improvements may include walking-oriented streetscape design with ample sidewalks, street furniture, wayfinding, street trees, and public art or other character-defining elements. The investment could include city-initiated improvements or partnering with adjacent property owners in conjunction with new development.
- N. Pursue public/private partnerships to provide neighborhood amenities to catalyze desired development. This could include a corner plaza integrated into surrounding development and/or a developmentwrapped parking garage. BRT investment promotes the use of public transit and helps shift long-term transportation modes. In the short term, development in areas that are transforming from auto-oriented environments to vibrant mixed-use centers can benefit from a parking structure as a catalyst for desired mid-rise mixed-use development forms. Notable examples can be found in downtown Bozeman (MT), Kent Station, Kent (WA), and Woodin Creek Village in Woodinville (WA) (example figure below of garage well hidden behind active building frontages). Providing structured parking can assist TOD in areas under transformation by concentrating automobile parking in a single portion of a district offset from main streets, enabling pedestrian-oriented design throughout the remainder of the street network. This allows visitors to park once and experience the area primarily by walking, rolling, or taking the bus.



- O. Study options for improved east-west connections for people walking, bicycling, and rolling across and through the north end of neighborhood on Mission Ave. Mission Ave is the only direct bicycle and walking connection between the study area and Chief Garry Park Neighborhood. The Iron Bridge, a half-mile to the south, provides the closest alternative route. Such improvement could include widening of the current facility or constructing a separate, adjacent pedestrian connection if widening the existing facilities isn't feasible.
- P. Study options for improving river crossings for people walking, bicycling, and rolling in the vicinity of Mission Park, including studying a new bike/walk bridge at Sharp Ave, if related improvements on or adjacent to the Mission Ave bridge are determined to be infeasible. A new Sharp Ave crossing over the Spokane River would provide a parallel crossing for people walking, bicycling, and rolling, connecting directly with a planned shared-use pathway along Riverton Avenue and future east-west neighborhood greenways in the Chief Garry Park Neighborhood. If pursued, additional study and community discussion is needed to determine feasibility of this option.

Figure 3 shows the Preferred Alternative Concept Maps.



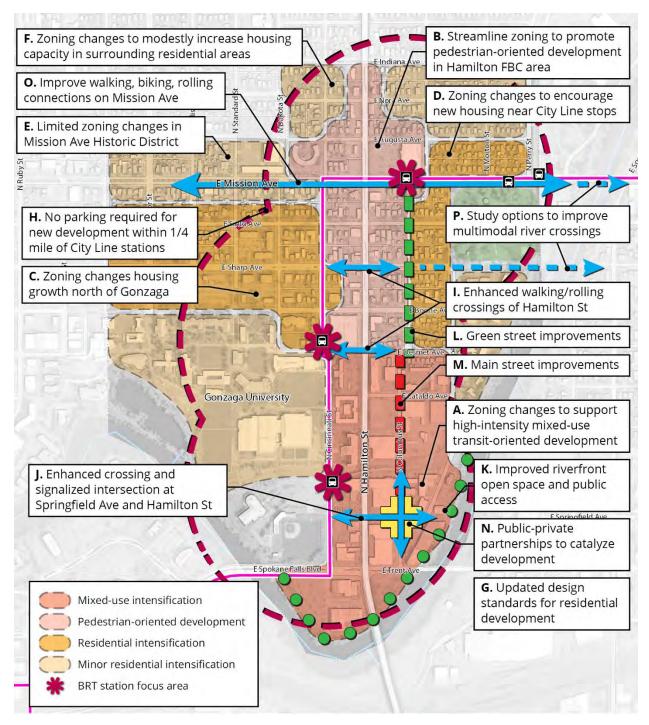


Figure 3 Preferred Alternative Concept Map



3 Existing Conditions, Impacts, & Mitigation Measures

3.1 Land Use

3.1.1 Existing Conditions

The South Logan study area is urban in nature, developed early on in Spokane's history because of its proximity to downtown, the Spokane River, and the railroads. It contains an eclectic mix of uses, including Gonzaga University and student housing, athletic facilities, manufacturing and warehouses, retail and restaurants, small-scale apartments, and detached single-family homes. The northern portion of the study area is largely residential, predominantly detached single family homes, but with a variety of multifamily buildings mixed in throughout the area. Restaurants and service industries are concentrated along the Hamilton Street corridor. Gonzaga University occupies the southwestern portion of the study area, generally south of Sharp Avenue and west of Cincinnati Street. South of Desmet Avenue and east of Gonzaga University, the study area features a mixture of manufacturing, warehouses, athletic facilities, service-oriented uses, retail and dining uses, and professional offices. The area also contains vacant and underutilized properties, including large parking lots. Generally, the study area is developed less densely than what would be permitted under the current zoning, particularly along Hamilton Avenue and south of Desmet Avenue. The study area's current land uses are shown on Figure 5.

3.1.1.1 Relevant Policies and Regulations

1) Comprehensive Plan

• LU 1.4 Higher Intensity Residential Areas

Direct new higher intensity residential uses to areas in and around Centers and Corridors designated on the Land Use Plan Map and to areas where existing development intensity is already consistent with development of this type.

LU 3.2 Centers and Corridors

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.

• LU 3.5 Mix of Uses in Centers

Achieve a proportion of uses in Centers that will stimulate pedestrian activity and create mutually reinforcing land uses.

• LU 4.1 Land Use and Transportation

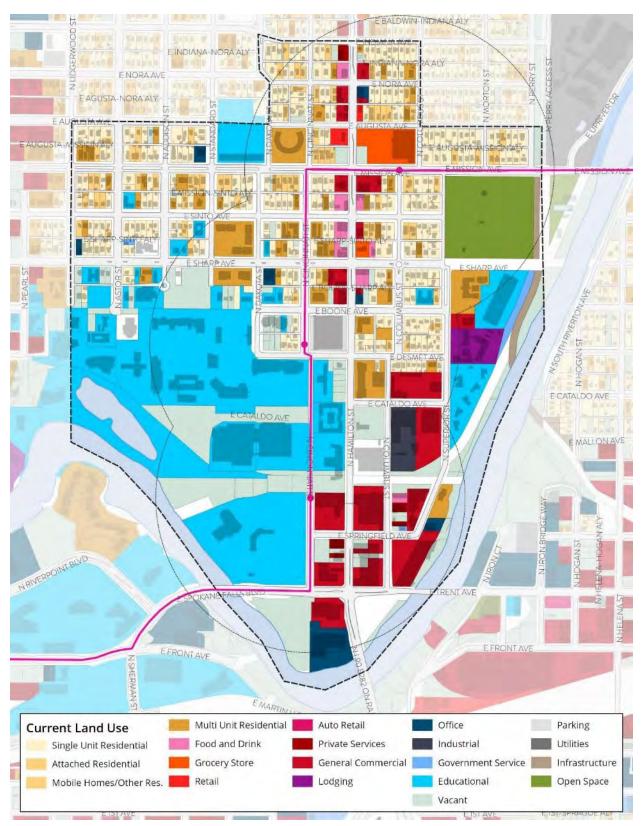
Coordinate land use and transportation planning to result in an efficient pattern of development that supports alternative transportation modes consistent with the Transportation Chapter and makes significant progress toward reducing sprawl, traffic congestion, and air pollution.

• LU 4.2 Land Uses That Support Travel Options and Active Transportation

Provide a compatible mix of housing and commercial uses in Neighborhood Centers, District Centers, Employment Centers, and Corridors.



Figure 4 Current Study Area Land Uses





• LU 4.4 Connections

Form a well-connected network which provides safe, direct, and convenient access for all users, including pedestrians, bicycles, and automobiles, through site design for new development and redevelopment.

• LU 4.6 Transit-Supported Development

Encourage transit-supported development, including a mix of employment, residential, and commercial uses, adjacent to high-performance transit stops.

• LU 5.5 Compatible Development

Ensure that infill and redevelopment projects are designed to be compatible with and complement surrounding uses and building types.

• SMP 3.1 Shoreline Access

Improve access to the shoreline by developing, where appropriate, pathways, trails, and bikeways along and adjacent to the shoreline.

• SMP 3.2 Access System

Ensure that a system of arterials, scenic drives, pathways, public transit routes, and bikeways adjacent to and within the shoreline areas provides appropriate access to the Spokane River and Latah Creek in a way that meets the needs and desires of the community as reflected in the Comprehensive Plan, while also preserving ecological function of the shorelines.

• SMP 11.33 Economic, Social, and Physical Needs

Ensure that shoreline uses satisfy the economic, social, and physical needs of the city.

2) Transit-Oriented Development Framework Study

Regulatory Approach

Focus regulatory changes and priority investments in active transportation infrastructure within TOD opportunity areas.

• Zoning Modifications Modify TOD supportive base zones and residential zones within the Title 17C Land Use and Design

Standards to promote TOD more directly.

Residential Zones Modifications

Middle Housing defined as duplexes, triplexes, quadplexes, cottage clusters, townhouses, and accessory dwelling units (ADU) provides an opportunity to increase housing supply in developed neighborhoods and can be compatible with detached single-family dwellings.

• Rezone TOD Opportunity Areas

Potential TOD opportunity areas include base zones, such as single-family/two-family zones with residential densities that are not transit supportive, preclude housing choice, and potentially limit affordable access to housing.

3.1.1.2 Zoning

The study area contains a wide range of zoning designations, with generally higher intensities in the south and lower intensities in the north. The zoning parameters are shown in Table 2.



Zone Category	Acreage in the study area	Allowed Types & Uses	Maximum Height	Density/Floor Area Ratio (FAR)				
Residential Zones								
Residential 1 (R1)*	97.8	Low intensity residential buildings: detached house, Duplex, triplex, four-plex, or townhouses; Manufactured house	35' (roof) /25' (wall); 40' (roof) /30' (wall)	0.5 max FAR No max FAR Density Max: 10 units/acre Density Max: Up to 4 units on a lot				
Residential 2 (R2)*	22.8	Low intensity residential buildings: detached house, duplex, triplex, four-plex, or townhouses ; Manufactured homes	35' (roof) /25' (wall); 40'(roof) /30' (wall)	0.5 max FAR No max FAR Density Max: 20 units/acre Density Max: Up to 4 units/lot				
Residential Multifamily (RMF)	26.4	Multifamily buildings, SROs, low intensity residential buildings	35′ 40'	No max FAR Density Max: 30 units/acre (does not apply to low- intensity residential buildings)				
Residential High Density (RHD)	49.0	Multifamily buildings, SROs, low intensity residential buildings	55' (one half block fronting on the Desmet BRT stop is 35')	No max FAR No max density				
Commercial Zones								
Office retail (OR)	15.1	Office, vertical mixed use, retail, institutional uses, residential uses	55'	6.0 max FAR for non- residential				
General Commercial (GC)	45.9	Most commercial and residential uses	150′	Max FAR for non-res No max FAR for residential/mixed-use				
Center and Corridor 1 (CC1-DC / CC1-EC)	16.7 / 9.25	Commercial and residential uses with some limitation on auto-oriented uses	DC: 55' non-res. (corridor); 70' res-mixed (corridor) EC: 150' (emp center)	Min FAR 1.0 for res/mixed-use 0.5 max base FAR for non- res 3.0 max FAR for non-res with amenities No max FAR for res/mixed-use				
Hamilton Form-Based Code								
Context Area 1 / 2 (CA-1 / CA-2)	8.6 / 3.68	Mix of pedestrian-oriented commercial, office & multifamily residential uses	66'	No max FAR				
Context Area 3 (CA-3)	9.1	Mix of pedestrian-oriented commercial, office & multifamily residential uses	54'	No max FAR				

Table 2 Study Area Zoning



		Mostly residential uses		
Context Area 4	10.8	with some pedestrian-	35' (roof) / 25' (wall)	No max FAR
(CA-4)		oriented commercial in		
		mixed-use buildings		

*Under the Building Opportunity for Housing initiative, Residential Single-Family was changed to Residential 1 (R1) and Residential Two-Family was changed to Residential 2 (R2) in November 2023 during the development of this document.

Figure 5Existing land use and zoning within the study area are described in more detail in the South Logan TOD Subarea Plan. Figure 5 illustrates the planning area's current zoning.

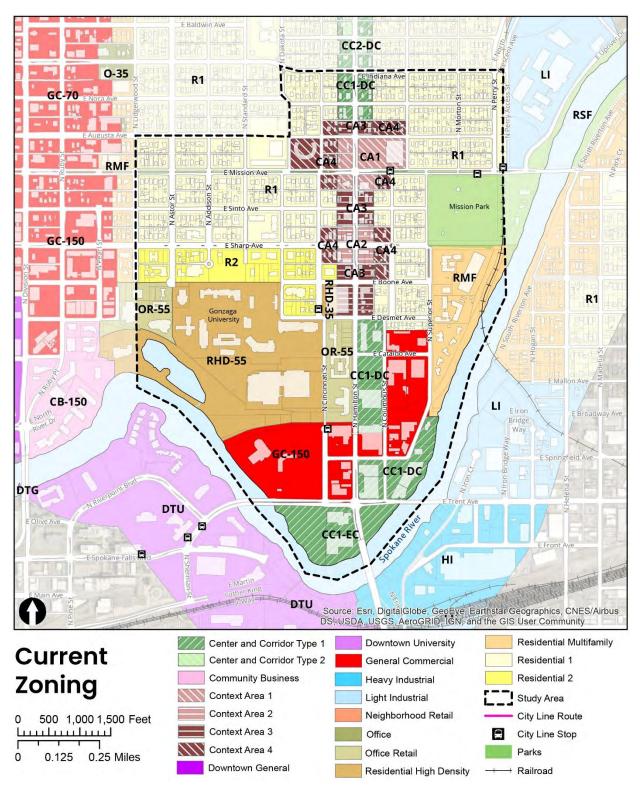
3.1.1.3 Shorelines of the State

The Shoreline Management Act (SMA) focuses on shoreline use, environmental protection, and public access. The City of Spokane implements the SMA through its Shoreline Master Program (SMP). The Spokane SMP provides shoreline designations and regulations for the City's shorelines in compliance with the requirements of the SMA. The Spokane River is regulated by the SMP and is within the study area. This portion of the Spokane River is located in the Campus/U-district and Upriver shoreline districts and is currently designated as Limited Urban and Urban Conservancy Environments.

The Limited Urban Environment accommodates a range and mixture of water-oriented residential, commercial, and institutional uses at moderate intensity and density, while protecting existing ecological functions and restoring areas that have been previously degraded. This designation also provides for appropriate public access and recreation uses. The Urban Conservancy Environment is intended to protect and restore ecological functions of open space, floodplain, and other sensitive lands where they exist in developed areas, while allowing a variety of compatible uses. The study area shoreline zones are shown on Figure 6.



Figure 5 Current Zoning Map





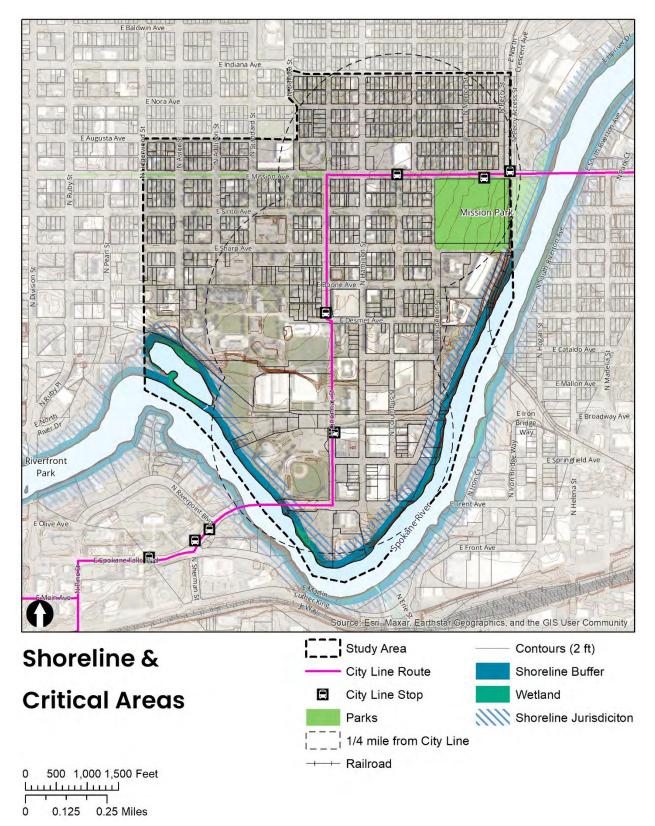


Figure 6 Study Area Shorelines and Critical Areas



3.1.2 Potential Impacts

The Preferred Alternative was evaluated for effects on existing and future land uses as compared to those evaluated for the Action Alternatives in the DEIS. Potential impacts were assessed based on incompatibility with adopted plans, policies, and regulations. All Action Alternatives would require updates to the City of Spokane Comprehensive Plan and Spokane Municipal Code, specifically development standards and zoning map. The alternatives primarily differ in the distribution of zone changes and the resulting incremental intensification of new development that could lead to land use impacts. The preferred alternative is composed of some combination of the three action alternatives, based on feedback.

As with the Action Alternatives presented in the DEIS, the study area would likely experience housing and employment growth over the planning horizon under the Preferred Alternative which would:

- Change the GC designations to CC.
- Result in gradual intensification of density, use, and height in rezoned areas over time.
- Permit denser and more diverse housing and commercial development around the Hamilton Street core.
- Result in gradual shifts from single-family to multifamily or mixed-use in the Hamilton Street Corridor and in the southeast riverfront area.

The land use and zoning changes proposed for the Preferred Alternative are similar to Alternative 4: TOD Emphasis, with increases in building heights and intensity in the areas in proximity to the BRT stations. One difference between the Preferred Alternative and the Action Alternatives in the DEIS is that the Preferred Alternative proposes a 75' height limit for the RHD zone instead of 70' to accommodate seven-story buildings. This alternative leverages the multimillion-dollar public investment in the City Line and maximizes connectivity and accessibility within the study area. The changes to intensity and scale are greatest within the core of the South Logan study area focused along the Hamilton Street Corridor and the southeast riverfront, with less change at the edges as it transitions to the north. Similar to the other Action Alternatives, the Preferred Alternative changes the GC designations to CC and retains the existing height limit.

The Preferred Alternative would provide several benefits by improving public infrastructure, such as green streets and investment in main street improvements. It also allows for higher density housing near walkable and transit-oriented areas, which is consistent with the policies in the Comprehensive Plan and the guidance in the Spokane Housing Action Plan.

The Preferred Alternative would result in a similar amount of mixed-use intensification within the shoreline zone as Alternative 3: Southeast Riverfront from the DEIS. Any proposed development or redevelopment within the shoreline zone would be required to comply with the current SMP policies and regulations, as well as undergo additional evaluation for potential impacts to shoreline functions and the Spokane River.

3.1.3 Mitigation Strategies

The anticipated Land Use impacts from implementation of the Preferred Alternative are expected to fall within the same range as the Action Alternatives analyzed in the DEIS. As such, the mitigation proposed in the DEIS also applies to the Preferred Alternative.

Development and growth are expected to occur over time and are not anticipated to occupy all sites within the South Logan area through the planning horizon of 2047 addressed in the Subarea Plan. Zoning changes alone do not cause development; however, they direct the future development pattern, intensity, and scale that would be



expected as redevelopment occurs. Incremental development over time would likely moderate the impacts on land use. If a faster or concentrated pattern of growth occurs, greater land use impacts could occur.

The City of Spokane may choose to update zoning and design regulations in applicable areas, such as where zones transition from higher to lower height limits, to further assist in mitigating the impacts of larger scale development and meet community design objectives.

3.2 Housing and Anti-Displacement

This section covers housing, including characteristics of existing housing and potential housing growth, and displacement, including both residential and commercial displacement.

3.2.1 Existing Conditions

3.2.1.1 Relevant Policies and Regulations

1) Comprehensive Plan

The Spokane Comprehensive Plan addresses housing issues in Chapter 6 – Housing, with related policies in Chapter 3 – Land Use, Chapter 8 – Urban Design and Historic Preservation, and Chapter 11 – Neighborhoods.

Vision Statement and Values

The Chapter 6 – Housing vision statement and values read:

"Spokane will enjoy a quality of life for everyone that includes a diversified economic base that provides a livable wage, a healthy natural environment, and an economically vibrant downtown. Spokane's quality of life will be built on a partnership of diverse interests, including education, business, government, and neighborhoods."

"The things that are important to Spokane's future include:

- Keeping housing affordable;
- Encouraging home ownership;
- Maintaining pride in ownership;
- Developing a good mix of housing types;
- Encouraging housing for the low-income and homeless throughout the entire city;
- Preserving existing houses; and
- Rehabilitating older neighborhoods."

Chapter 6 – Housing includes a number of policies relevant to housing and anti-displacement in South Logan. These include:

- **H 1.4 Use of Existing Infrastructure** Direct new residential development into areas where community and human public services and facilities are available.
- H 1.7 Socioeconomic Integration Promote socioeconomic integration throughout the city.
- **H 1.9 Mixed-Income Housing** Encourage mixed-income developments throughout the city.



• H 1.10 Lower-Income Housing Development Incentives

Support and assist the public and private sectors to develop lower-income or subsidized housing for households that cannot compete in the market for housing by using federal, state, and local aid.

• H 1.11 Access to Transportation

Encourage housing that provides easy access to public transit and other efficient modes of transportation.

• H 1.13 Siting of Subsidized Low-Income Housing

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.

• H 1.18 Distribution of Housing Options

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.

- **H 1.21 Development of Single-Room Occupancy Housing** Allow development of single-room occupancy units in downtown Spokane and in other areas where high-density housing is permitted.
- H 2.3 Housing Preservation Encourage preservation of viable housing.
- **H 2.4 Linking Housing with Other Uses** Ensure that plans provide increased physical connection between housing, employment, transportation, recreation, daily-needs services, and educational uses.

2) Zoning

All of the zoning categories present in South Logan allow some level of residential development. See Section 3.1 Land Use for more information on allowed residential development under existing zoning in the study area. For more information on zoning parameters within the study area, see the South Logan TOD Subarea Plan.

3) Affordability Programs

Multi-Family Tax Exemption (MFTE). The study area is in the area approved for use of MFTE as part of the Targeted Investment Area, with three periods of partial property tax exemption for taxpayers, eight years, twelve years, and twenty years. To qualify for the 12 or 20-year MFTE partial property tax exemption, developers must set aside 25 - 30% of the units with income and rent restrictions for households earning at or below 80-115% of Area Median Income (AMI). There are no income and rent restriction requirements for the 8-year partial property tax exemption. Currently, market rent for new construction is estimated to be affordable to households earning between 80% and 100% of AMI for typical unit types.



Table 3 Rent Limits by Unit Type, 2022

Unit Type	Studio	One Bedroom	Two Bedroom
115% AMI	\$1,693	\$1,935	\$2,176
100% AMI	\$1,473	\$1,683	\$1,893
Market Rent	\$1,325	\$1,426	\$1,894
80% AMI	\$1,179	\$1,346	\$1,515
60% AMI	\$884	\$1,010	\$1,136

Source: City of Spokane MFTE Program – 2022 Rent Limits, CoStar, Heartland, 2022.

In addition to MFTE, several properties within the study area offer income-restricted subsidized affordable housing through federally funded programs.

Building Opportunity and Choices for All. The Building Opportunity and Choices for All pilot zoning program was passed by the Spokane City Council in July 2022 with the intention of increasing housing affordability and variety by removing regulatory barriers to housing construction. The interim ordinance was originally effective through July 18, 2023, but has been extended to December 18, 2023 to allow for permanent regulations to be adopted. Building Opportunity and Choices for All allows for construction of townhomes, duplexes, triplexes, and fourplexes in residential zones, except Residential Agriculture, citywide. The interim ordinance also reduces parking minimums and allows larger buildings in Center and Corridor zones for developments made up of at least 50% residential.

3.2.1.2 Existing Housing

The study area includes a range of housing types, including detached single-family homes, student dormitories, both market-rate and subsidized apartments, senior housing, and assisted living. It includes detached houses that have been converted into rooming houses or de facto apartments for student housing. There are distinctive buildings with a range of architectural styles and periods. It includes people who rent from the private market, non-profits, or the university, as well as a small number of homeowner households. Overall, about 93% of study area residents pay some form of rent for housing, while 7% own their own home (ACS 2020 5-year estimates, table B25003).

There are approximately 1,025 existing dwelling units in the study area. This does not include group quarters such as student dormitories and assisted living facilities, which accommodate about half of the local population (ACS 2020 5-year estimates, table B09019). The approximate population of the study area including dwelling units and group quarters is 4,676 (Esri, 2022). Overall, about 28% of the land in the study area is dedicated to housing:

- 48 parcels, totaling 20.0 acres of five-plus unit housing
- 75 parcels, totaling 11.8 acres of two- four-unit housing
- 322 parcels, totaling 50.4 acres of single unit housing

1) Subsidized and Senior Housing and Affordability

The study area has several income-restricted affordable housing buildings, as well as private senior housing and assisted living.



- **The O'Malley Apartments**. HUD-subsidized senior housing operated by Catholic Charities Eastern Washington, with 99 one-bedroom units with income limits.
- Hamilton House. HUD-funded low-income housing with 42 one- and two-bedroom units.
- Maplewood Gardens. Senior housing and assisted living operated by Care Partners.

Approximately 48% of all households within the study area census tracts are rent burdened, meaning they pay 30% or more of their income for rent (ACS 2021 5-year estimates, table B25106).

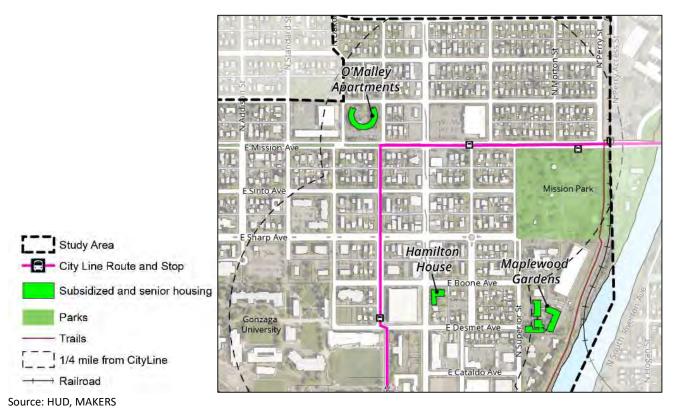


Figure 7 Existing Subsidized and Senior Housing

3.2.1.3 Market

1) Rents

Overall, the real estate market in the study area is slightly weaker than the market for the City of Spokane as a whole, though residential rents and home sale prices in the study area are growing faster than most other types of real estate. The addition of the new City Line BRT route is likely to increase the desirability of the study area for new development and redevelopment and increase the risk of displacement.

Over the past five years:

- Multifamily annual rents have increased by 5% annually since 2017 in South Logan to \$21.60 per sf but remain slightly below the citywide average of \$23.88 per sf (2022).
- Citywide office lease rates have risen about 3.5% annually to \$27 per sf (2022).



- Citywide retail lease rates have risen about 3% annually to \$22 per sf (2022).
- Citywide industrial lease rates have risen about 7% annually to \$8.2 per sf (2022).
- Single family home median prices in Spokane have risen at about 15.2% annually, more than doubling over the past five years. Home prices in Logan are typically about 25% below the citywide average.²

2) Likely Development Outcomes

Market-rate multifamily development, whether conventional or student housing, is likely feasible in the study area. An all-affordable housing development would likely be infeasible without subsidy or some other form of financial support.

Current rental rates for commercial uses are too low to justify the cost of construction for retail, office, and industrial uses. A specific tenant can occasionally emerge needing new space in a particular area that is willing to pay a rental rate which is above market in order to justify the cost of construction. These conditions are referred to as a "build to suit" market.

Single family and townhouse development would be feasible in the area if vacant sites were available but is less likely to occur where existing buildings generate value.³

3) Potential Development Sites

The stretch of the southern portion of Hamilton Street Corridor north of Trent Avenue is characterized by large, low-intensity manufacturing sites with a variety of commercial zoning designations, including General Commercial (GC), Office Retail (OR), and Center and Corridor (CC). With the proposed rezoning from General Commercial to Centers and Corridors, this area is likely to redevelop with higher density, mixed-use buildings with a greater pedestrian orientation and some limitations on auto-oriented activities. There are a number of parcels south of Cataldo Avenue that have recently changed ownership or are transitioning from legacy manufacturing uses, which could result in significant opportunity for redevelopment. Due to its size, dimensions, and visibility, the Safeway site at the northeast corner of E Mission Avenue and Hamilton Street has significant redevelopment potential for ground floor grocery with multi-story housing above, though this is dependent upon Safeway's long-term strategy for store redevelopment.

Many educational and institutional uses, including the Gonzaga Tennis Center, the Boone Avenue Retail Center, the St. Aloysius Catholic Church and associated religious facilities, the St. Aloysius Gonzaga Catholic School, the Health Peninsula, and other university-focused sites are unlikely to be redeveloped in the near-term. Other recently redeveloped sites like The Academy Apartments, Joya Child and Family Development, the Matilda Apartments, and the private recreational facility The Warehouse are also unlikely to be redeveloped. Much of the housing along the northern edge of Gonzaga University is owned and managed by the University as student housing, and Gonzaga has their own master housing plan.

3.2.1.4 Displacement Risks

In recent years, the City of Spokane has invested in substantial research related to zoning reform, transit-oriented development, housing policy, and anti-displacement measures which might be adopted either citywide or in specific areas, including research which focused on the South Logan area. Displacement in its various forms –

³ South Logan, Existing Conditions Report, 2022



² CoStar, Heartland, 2022

physical, economic, and cultural – has multiple, often interrelated causes and is an inevitable consequence of growth and development. However, the impacts of displacement can be mitigated. It is important that policies and plans in this area leverage the relationship between transportation and development to prevent displacement and ensure that new investment benefits existing residents and businesses in addition to accommodating new ones.

Heartland LLC prepared a Housing and Anti-Displacement Memo to summarize research, best practices, and a range of policies to promote housing and anti-displacement strategies in the study area and beyond. Affordability and anti-displacement measures were also highlighted in public meetings and comments as a community priority for future development and redevelopment in South Logan.

1) Vulnerable Populations

Lack of housing which is affordable to low- and moderate-income residents has been identified as a critical factor driving displacement of people. Similarly, lack of affordable commercial space is a key driver affecting the displacement of businesses. In South Logan two demographic groups have been identified as most vulnerable to the pressures of displacement:

• Non-student, low-income residents, particularly elderly and/or disabled people. Residents over age 65 represent approximately 13% of the population in the study area, roughly in line with the city as a whole. At the same time, 34% of households in the study area home to at least one person with a disability, compared to 16% of the citywide population. This is likely due to the presence of several group homes and assisted living facilities in the study area.

• Locally owned businesses.

There are approximately 131 businesses in the study area, with a total of 2,751 jobs.⁴ These include 47 retail trade and eating and drinking businesses, and 51 businesses classified as services. Roughly 80% of employees in South Logan are estimated to work at locally owned businesses.⁵ Some businesses, especially locally owned businesses, are located in older buildings with relatively affordable rents and long-term leases. Similarly, lack of affordable commercial space is a key driver affecting the displacement of businesses.⁶

2) Relevant Studies

The City of Spokane has begun to study displacement as part of other reports, including:

- "Appendix E Displacement Risk Assessment," City of Spokane Housing Action Plan, July 2021.
- TOD Framework Study, City of Spokane Planning Department, May 2022.

The Spokane Housing Action Plan Displacement Risk Assessment considered a range of factors that increase vulnerability to displacement using the CDC Social Vulnerability Index (SVI) (Figure 8). The SVI identifies vulnerability related to socioeconomic status, household composition and disability, minority status and language, and housing type and transportation status. The assessment gave the study area a score of 0.77 out of 1.00 indicating relatively high risk of displacement. The main contributing factors to this high score were

⁶ "<u>Rethinking Local Affordable Housing Strategies: Lessons from 70 Years of Policy and Practice</u>," The Brookings Institution



⁴ ESRI, 2022

⁵ South Logan, Existing Conditions Report, 2022

Socioeconomic Status, with a score 0.95 likely reflecting the low income of area residents (including college students), and Housing Type and Transportation with a score of 0.75, likely reflecting the large percentage of study area residents living in group quarters (including student dormitories). Figure 9 shows a map of displacement risk for the study area.

		Below Poverty	
Overall Nullerapility Household Composit Disability Minority Status & Lar Housing Type & Transp	Sanianana mia Statua	Unemployed	
	Socioeconomic Status	Income	
		No High School Diploma	
		Aged 65 or Older	
	Household Composition and	Aged 17 or Younger	
	a state of the sta	Older than Age 5 with a Disability	
		Single-Parent Households	
		Minority	
	Minority Status & Language	Speaks English "Less than Well"	
		Multi-Unit Structures	
		Mobile Homes	
	Housing Type & Transportation	Crowding	
		No Vehicle	
		Group Quarters	

Figure 8 Factors included in Housing Action Plan Displacement Risk Assessment

Source: CDC SVI 2018 Documentation, January 31, 2020, and Spokane Housing Action Plan Displacement Risk Assessment, May 2021.



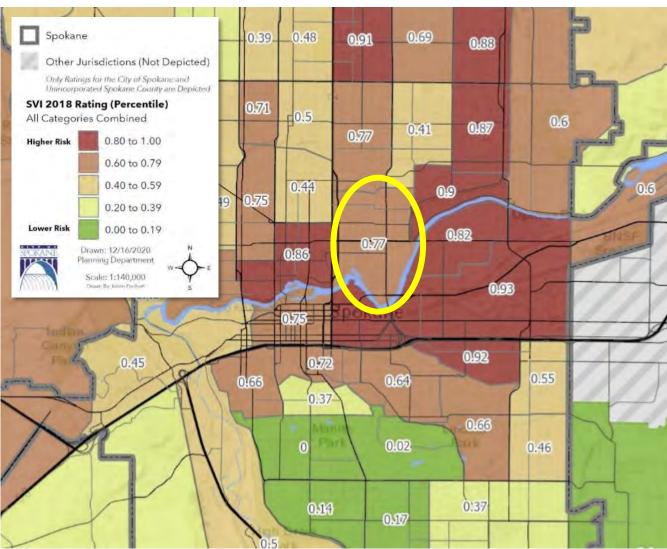


Figure 9 Displacement Risk Map with the South Logan Study Area Circled

Source: Spokane Housing Action Plan Displacement Risk Assessment, May 2021

The TOD Framework Study looked at housing displacement related to transit support land uses and looked at vulnerability factors similar to the SVI. The TOD Framework Study identified that the McCarthey Athletic Center Station and the Desmet Station had a low risk for housing displacement, while the Hamilton/Columbus Station had a medium risk for housing displacement.⁷

⁷ Spokane Transit-Oriented Development Framework Study, 2022



LISNA, UPPOR COLUMBUS HAMILTON/ ATHLETIC PARK DESMET CENTER REGAL COOK NAPA SCC **Transit supportive** development: Development "gaps": **Displacement risk TOD Potential:**

Figure 10 Transit-Supportive Land Use Evaluation Matrix

Source: TOD Framework Study Initial Review and Analysis presentation, March 2021.

3.2.1.5 Businesses

There are approximately 131 businesses in the study area,⁸ with a total of 2,751 jobs. These include 47 retail trade and eating and drinking businesses, and 51 businesses classified as services. Roughly 80% of employees are estimated to work at locally owned businesses.⁹ Some businesses, especially locally owned businesses, are located in older buildings with relatively affordable rents and long-term leases.

3.2.2 Potential Impacts

This analysis identifies significant impacts using the following thresholds:

- Insufficient production of dwellings needed, including affordable units.
- Changes to employment mix resulting in involuntary economic displacement by businesses.
- Insufficient affordable housing capacity to relocate displaced dwellings and population.

3.2.2.1 Preferred Alternative

1) Housing Capacity

The Preferred Alternative was evaluated for effects on housing and displacement compared to the Action Alternatives in the DEIS. All alternatives will see construction of new housing, increasing access to convenient, frequent transit service. With nearly all private parcels in the study area already developed, this will involve redevelopment, including redevelopment of some existing structures that provide homes or places of employment. With rising housing prices and strong demand, housing is likely to make up a large share of all new development.

⁸ ESRI, 2022

⁹ South Logan, Existing Conditions Report, 2022



New residences developed will likely be market-rate units. New MFTE units may be constructed through the 12 or 20-year program with income and rent restriction requirements, however the high-income limits for this program (80% - 115% of AMI) make it unlikely that these units will be significantly cheaper than market-rate rentals. However, the allowance for single-room occupancy (SRO) and group living buildings in RMF, RHD, and commercial zones, which allow smaller residences and lower parking requirements than typical residential construction, potentially provide for more affordable market-rate options.

The Preferred Alternative would likely see housing production similar to, but slightly less than, Alternative 4, with 2,954 new units projected to be developed by 2047. Upon buildout, this is projected to increase the population from 5,391 to as much as 11,411 over the 20-year growth period. Housing production may occur throughout the study area on parcels close to the transit stations and where conditions are most favorable to development. Upzones and the removal of parking minimums within ¼ mile of BRT stops will encourage development and help reduce development costs. Major redevelopment is most likely on larger parcels such as are found in the SE commercial/industrial area. Smaller parcels as found in the older residential neighborhoods north of Gonzaga University and around Mission Park are more expensive to redevelop, so overall infill may be limited even in areas where allowed heights are increasing significantly. Minor upzones in the Mission Avenue Historic District will discourage extensive development in that area relative to other parts of the subarea.

2) Business Displacement

There are 131 businesses located in the study area, mostly located along Hamilton and in the south-eastern part of the study area. Businesses in the southeast include restaurants and a brewery operation, retail stores, wholesale, manufacturing, medical services, and others. Some commercial/manufacturing parcels have seen recent turnover and are underutilized and present prime redevelopment opportunities. Gonzaga University is the dominant employer in the study area with approximately 45% of total employees. Excluding Gonzaga, approximately 80% of employees in the study area are employed by locally owned businesses. Many existing businesses require relatively large amounts of land and, as land values rise, may choose to sell their land to developers and relocate elsewhere. Other businesses, especially small retail shops located along Hamilton, may not own their land and are vulnerable to displacement if their location is purchased by a developer and redeveloped. Over time, the job mix of the study area will likely change under all alternatives as existing businesses expand, others close over time, and some commercial/manufacturing properties are replaced with mixed-use development.

The Preferred Alternative may see business displacement along the Hamilton Street Corridor north of Boone Avenue if properties there are redeveloped. In particular, retail businesses that are tenants and rent commercial spaces may be at risk for displacement. However, broad upzones in residential areas in the Preferred Alternative mean that a large share of parcels that redevelop may be located in residential rather than commercial areas, mitigating displacement pressure on existing businesses. The proposed streamlined Hamilton FBC and Centers and Corridors zoning will encourage mixed-use development with a pedestrian-oriented, ground floor activation that could continue to support ground floor retail, ensuring a long-term supply of commercial spaces and potentially tempering rent pressure on other existing businesses. There is also some risk of business displacement in the SE area, where redevelopment is likely.

3) Residential Displacement

On parcels with residential rental units where zoning allows more intense development than buildings currently on the site, there is variable risk that the property will be redeveloped. On properties where redevelopment



occurs, rents for new buildings are typically higher rents than what was charged prior to redevelopment. As a result, past residents of the site may have difficulty securing housing they can afford within the neighborhood. The study area has a much higher proportion of low-income residents and residents with disabilities than the city as a whole, which could be a related to the concentration of university students and senior housing. Due to the proximity to Gonzaga University, there is a strong demand for rental housing for students in the study area, which can gradually push out non-student residents over time. Non-student, low income populations and elderly populations have an elevated risk of displacement due to redevelopment. With few owner-occupied housing units, most residential properties that redevelop will displace some renters temporarily if not permanently.

The Preferred Alternative may see residential displacement most similar to Alternative 4: TOD Emphasis. Some older houses in the northern residential area may redevelop, resulting in higher rents or sale prices. However, increased opportunities for student housing in and around the Gonzaga campus may alleviate pressure on market rents in remaining properties, reducing pressure on non-student renters.

3.2.3 Mitigation Strategies

The anticipated impacts to housing and potential displacement from implementation of the Preferred Alternative are expected to fall within the same range as the Action Alternatives analyzed in the DEIS. As such, the mitigation proposed in the DEIS also applies to the Preferred Alternative. The following mitigation strategies are identified in the South Logan TOD Housing and Anti-Displacement Memo, prepared as part of the South Logan TOD planning process. The strategies below have been ranked as easier to implement and the highest priority for future mitigation. Additional strategies and discussion are provided in the Memo.

3.2.3.1 Expand Upon Anti-Displacement Research

Continue to build a body of work speaking directly to Spokane neighborhoods while monitoring progress in other cities in Washington and across the country. While displacement has been occurring since time immemorial, anti-displacement has only recently been identified as a policy priority in many cities. The thinking is evolving quickly, and practical strategies should continue to be identified and refined so regular updates may be prudent. A displacement risk mapping tool that builds on the displacement risk assessment in the Spokane Housing Action Plan, could be a valuable tool for the City to fund and develop, and will help identify and monitor the highest-risk areas in Spokane.

3.2.3.2 Address Displacement in the Comprehensive Plan

In the upcoming periodic comprehensive plan update in 2026, consider identifying anti-displacement research and policymaking as a priority for the next planning cycle.

3.2.3.3 Community Engagement

Engage early and often with neighborhood stakeholders to ensure all voices are heard. Maintain multiple formats for communication (ex: website, mail, periodic community meetings) to ensure the broadest possible participation. Engaging with a broad swath of the South Logan community will be essential in working towards a goal of equitable TOD.

3.2.3.4 Public Development Authority ("PDA")

Ensure South Logan is in continuous dialogue with the University District Partnership ("UDPDA") and is engaged on any significant new development projects. Since the UDPDA already encompasses most of the South Logan area, perhaps all that is needed is renewed engagement with leadership to focus on the South Logan area and



work to identify near-, mid-, and long-term initiatives which might be done collaboratively which are specific to South Logan.

3.2.3.5 Flexibility for Ground Floor Retail Requirement

Ground floor retail requirements challenge developers in all markets. E-commerce has challenged traditional "bricks and mortar" retailers and while there are many examples of successful retailers who have adapted to and are thriving in the current environment, demand for retail space is difficult to predict and highly dependent upon context. South Logan is particularly challenged as it relates to retail because it relies heavily upon a transient student population, a significant segment of which leaves the area for part of the year. Developers today typically attribute little value to ground-floor retail and must budget for periods of sustained vacancy, particularly in situations where retail is required, but where market demand for retail space is minimal. For example, consider a large site which is located in the middle of a block without pedestrian-friendly streetscape improvements, but has a requirement for retail on the entire ground floor. Flexible ground floor standards that permit, but do not require retail, or require a smaller portion of the ground floor (e.g., corner space of buildings at intersections), would allow opportunities for retail to flourish in the right locations without also creating an impediment to new housing construction. Certain ground floor design or construction standards such as minimum floor heights can be employed to ensure flexibility to convert residential spaces to retail over time should demand for retail space increase in a particular location.

3.2.3.6 Tax Increment Financing ("TIF")

In 2021, the Washington State Legislature passed RCW 39.114, authorizing tax increment financing (TIF), a public financing tool enabling municipalities to sell bonds to finance broadly defined "public improvements" in targeted areas to catalyze and influence future development. "Public improvements" as a definition includes many kinds of public infrastructure as well as "Purchasing, rehabilitating, retrofitting for energy efficiency, and constructing housing for the purpose of creating or preserving long-term affordable housing." The University District PDA also has a TIF overlaying the district.

Utilize Tax Increment Financing (TIF) to unlock development sites constrained by upfront infrastructure costs by facilitating this mechanism which can be used to amortize the cost of upfront infrastructure over the long-term. Given the broad definition of "public improvements," including contributions in support of the creation or preservation of affordable housing, the power of this mechanism cannot be understated.

Why dedicate TIF funds to South Logan? The rationale for TIF in South Logan is due to the outsized investment, over \$175 million, the area has received in recent years – but which has not yet translated into broad-based property redevelopment. Tax Increment Financing can serve as a tool to unlock key sites which might be constrained by upfront infrastructure costs or other factors, following upon, and amplifying the substantial investments outlined below. South Logan is an employment hub, particularly to a valuable concentration of locally owned businesses, so to the extent that TIF can be used in exchange for developer-led commitments to preserve high-quality, affordable space for South Logan businesses, the investments outlined below will prove to have been well-considered and worthwhile.

- City Line \$92 million
- UW/GU Health Partnership Building \$60 million
- WSDOT Trent Bridge \$25 million



3.2.3.7 Reduce or Eliminate Minimum Parking Requirements

Consider offering developer incentives, such as an additional height allowance, which enables developers to reduce or eliminate parking requirements, through an in-lieu fee program which furthers the public benefit. For example, the in-lieu fees could fund affordable housing or the provision of below-market rate commercial space. One example currently in use in Spokane in the Center and Corridor zone is part of the MFTE code language, which allows qualified developments in those zones to eliminate parking requirements.

The City's Building Opportunity for Housing initiative includes consideration of parking standards, including state requirements under HB 1110 adopted by the Washington Legislature in 2023. The Preferred Alternative includes removing parking minimums within 1/4 mile of STA stations, while also monitoring market conditions for further reductions.

3.2.3.8 Facilitate Public-Private Partnerships ("PPP")

Cultivate partnerships with institutional stakeholders, most notably Gonzaga University and the University District Partnership, but also Eastern Washington University and the University of Washington, along with key private sector stakeholders, in support of business, community, and economic development in South Logan.

Explore partnerships with Community Development Financial Institutions (CDFIs), for example, Local Initiatives Support Corporation, Impact Capital, or Enterprise Community Development Fund. These organizations provide capital in support of affordable housing. They tend to be focused on large cities and rural areas and may need proactive outreach in order to be encouraged to venture into a smaller city like Spokane.

Explore private sector partnerships with dominant employers in the area, for example – Avista or Providence Health. One recent example of a successful partnership between an employer and the community in support of affordable housing was Orenda, where Seattle Children's Hospital invested equity to double the number of units from 20% to 40% of the total project available to residents earning less than 80% of AMI.

3.3 Air Quality

3.3.1 Existing Conditions

3.3.1.1 Relevant Policies and Regulations

Federal, state, and local agencies regulate air quality in the Spokane region: the U.S. Environmental Protection Agency (EPA), the Washington State Department of Ecology (Ecology), and the Spokane Regional Clean Air Agency (SRCAA). Each has its own role in regulating air quality. The City of Spokane codifies air quality policies in SMC 15.01.010 that provide limited regulatory authority over actions that could degrade air quality.

1) National Ambient Air Quality Standards

The Clean Air Act established National Ambient Air Quality Standards (NAAQS), with primary and secondary standards, to protect the public health and welfare from air pollution. Areas of the U.S. that do not meet the NAAQS for any pollutant are designated by the EPA as nonattainment areas. Areas once designated nonattainment but now achieving the NAAQS are termed maintenance areas. Areas with air pollution levels below the NAAQS are termed attainment areas.



2) Comprehensive Plan

The Spokane Comprehensive Plan addresses air quality issues primarily in Chapter 9 – Natural Environment.

- **NE 5.1 Clean Heating Sources** Encourage the use of heating sources that do not negatively affect Spokane's air quality.
- **NE 5.2 Facility Review** Review and determine public benefits in comparison to the environmental impacts of new and existing public or private facilities that negatively impact the region's air quality and health of its citizens.
- **NE 18.1 Innovative Development** Encourage innovative residential development techniques that produce low energy consumption per housing unit.

3) Spokane Municipal Code

The Spokane Municipal Code Chapter 15.01 addresses commute trip reduction, as required by the state (RCW 70.94.527). The code section provides a plan and implementing strategies to improve air quality and transportation system efficiency, as well as to reduce energy consumption, through employer-based incentive programs.

4) Air Quality Attainment

Pollutants generated by both natural and manmade sources affect air quality. In general, the largest manmade contributors to air emissions are transportation vehicles and power-generating equipment, both of which typically burn fossil fuels. The pollutants of most concern for the Spokane region are fine particles (PM2.5), coarse particles (PM10) and ground-level ozone (O3). The most common pollutant, PM2.5, comes from smoke, dust, vehicle exhaust, and ozone. The closest air quality monitoring station is located at Augusta and Fiske, directly east of the Logan Neighborhood. The Spokane region is currently in attainment for all criteria pollutants.

3.3.2 Potential Impacts

The Preferred Alternative was evaluated for effects on existing and future air quality as compared to those evaluated for the Action Alternatives in the DEIS. Future growth under any of the alternatives will result in some amount of development. Most development projects would include demolition and removal of existing structures, excavation and site preparation, and construction of new buildings. Emissions generated during construction would include exhaust emissions from construction equipment, trucks used to haul construction materials to and from sites, worker vehicle emissions, and fugitive dust emissions associated with earth-disturbing activities and other demolition and construction work.

The SRCAA requires dust control measures (emissions control) for construction projects (SRCAA Regulation I, Article VI, Section 6.05). Measures applicable to fugitive dust include taking measures to remove dirt and mud from equipment and vehicles before moving onto paved roads, promptly removing dirt and mud tracked onto paved roads, and not creating nuisance dust (airborne) from construction activities. Given these requirements, impacts related to construction dust are concluded to be less than significant.

The estimated increase in vehicle traffic due to population growth is not expected to significantly affect air quality in the area. The implementation of TOD would create a more walkable neighborhood with convenient access to STAs high-frequency transit service. It is likely that transit ridership within the study area will increase



over time as redevelopment occurs, thus offsetting the increase in general purpose traffic, at least in part, from population growth. See Section 3.10 Transportation for additional information on traffic volumes.

The proposed changes for the Preferred Alternative are similar to Alternative 2, in terms of the focus on enhancing neighborhood connections and livability. There would be an estimated population increase of 6,735, which would contribute to traffic congestion and emissions. However, the Preferred Alternative includes priorities for multi-modal improvements, traffic calming, and streetscape improvements, as well as TOD, which would, in part, offset the impacts from additional traffic. In addition, the proximity to the City Line creates enhanced public transit options in the study area that would be expected to reduce private vehicle usage and traffic. The proposed zoning changes would encourage development of additional housing and mixed-use properties, which are not typically major contributors to air quality issues.

3.3.3 Mitigation Strategies

The anticipated air quality impacts from implementation of the Preferred Alternative are expected to fall within the same range as the Action Alternatives analyzed in the DEIS. As such, the mitigation proposed in the DEIS also applies to the Preferred Alternative.

Construction best management practices (BMPs), such as fugitive dust control and regular equipment maintenance, would be required to be implemented for all projects proposed under the Subarea Plan, as required by the SRCAA and described above. Those requirements are expected to mitigate any potential impacts to air quality from construction activities.

Mitigation strategies for intensification of uses could include the requirement for developments to include additional landscaping and open or green spaces. The City may also consider prioritizing multi-modal facilities as capital improvements are planned for the area.

3.4 Water Resources and Water Quality

3.4.1 Existing Conditions

3.4.1.1 Relevant Policies and Regulations

1) Comprehensive Plan

The Spokane Comprehensive Plan addresses water resources and water quality issues primarily in Chapter 9 – Natural Environment. Natural Environment Goal 4 is to "Provide for clean rivers that support native fish and aquatic life and that are healthy for human recreation."

• NE 1.2 Stormwater Techniques

Encourage the use of innovative stormwater techniques that protect ground and surface water from contamination and pollution.

- **NE 1.7 Wellhead Protection** Allow only non-polluting land uses within the water recharge zones of the public water wells.
- **NE 4.3 Impervious Surface Reduction** Continue efforts to reduce the rate of impervious surface expansion in the community.



2) Integrated Clean Water Plan

The City of Spokane is developing the Integrated Clean Water Plan in an effort to help the City meet its regulatory requirements related to water quality in the Spokane River and Lake Spokane. All these requirements come from the Clean Water Act and are regulated through a National Pollutant Discharge Elimination System (NPDES) permit for combined sewer overflows (CSOs) and municipal wastewater treatment, existing and potential future total maximum daily load (TMDL) limits, and the Eastern Washington Phase II NPDES Municipal Stormwater Permit.

The goals of the Integrated Clean Water Plan include:

- A cleaner river, faster the City prioritizes projects that have a greater impact on reducing pollution in the Spokane River.
- Implement cost-effective and innovative approaches the City looks at new "green" strategies, such as storm gardens and pervious pavement, to remove stormwater from the existing systems for long-term management.
- Holistic integration with other infrastructure the City wants to leverage transportation (street) projects to incorporate green infrastructure. When these projects are coordinated and integrated, the public can have multiple system improvements while disrupting the local area only once.

3.4.1.2 Spokane River

The Spokane River is the dominant water resource in the region and is a defining geographical and cultural feature of the South Logan study area as it makes up a large portion of the study area boundary.

The Department of Ecology tracks and assesses water bodies that do not meet water quality standards. The current Department of Ecology 303(d) list includes the Spokane River with the following: Category 5: polychlorinated biphenyls (PCBs), bacteria-fecal coliform, methyl mercury, and polybrominated diphenyl ethers (PBDEs).

Waters that have Category 5 impairments are required to undergo a Total Maximum Daily Load (TMDL) process, or water quality improvement project. There are two approved TMDLs currently in place (Spokane River and Lake Spokane Dissolved Oxygen Total Maximum Daily Load and the Spokane River Dissolved Metals Total Maximum Daily Load) and one currently being developed to address PCBs. These TMDLs are working to improve the water quality in the Spokane River.

3.4.1.3 Stormwater Outfalls

The City of Spokane provides and maintains the planning area's storm drain system, with outfalls in the study area ultimately flowing into the Spokane River. Surface water on Spokane Falls Blvd goes through a system of grassy swales prior to flowing into the river. Select outfalls are direct to the river, and the City intends to enhance its stormwater conveyance and treatment in those areas. Most often, stormwater infrastructure improvements are implemented as part of other work, such as roadway and sidewalk projects.

Stormwater in the City of Spokane is regulated by the Eastern Washington Phase II Municipal Stormwater -National Pollutant Discharge Elimination System (NPDES) Permit issued by the Washington State Department of Ecology (Ecology). Current stormwater regulations require new development and redevelopment to mitigate new impervious surfaces and pollution generating surfaces with flow control and/or water quality treatment.



Additionally, developments can enhance their stormwater management by working together to partner in providing community amenities when possible.

3.4.1.4 Spokane-Rathdrum Aquifer

The planning area is located entirely within the Water Resource Inventory Area (WRIA) 57 Middle Spokane. The principal aquifer in WRIA 57 is the Spokane-Rathdrum Aquifer. The Environmental Protection Agency (EPA) designated this as a "sole source aquifer" as it is the sole source of drinking water for most people in Spokane County and in Kootenai County, Idaho. Having this designation ensures there is regulatory oversight to ensure that projects located within the aquifer recharge area do not degrade water quality in the groundwater.

The South Logan study area is in a high susceptibility area for potential impacts to the aquifer. The northeast corner of the study area is located within a well head protection area (Spokane County, 2019).

3.4.2 Potential Impacts

The Preferred Alternative was evaluated for effects on existing and future water resources and water quality as compared to those evaluated for the Action Alternatives in the DEIS. Future growth under any of the alternatives could result in some amount of development. Population growth in the neighborhood would proportionally increase the amount of wastewater and stormwater runoff, but at different rates of development. As projects are implemented, they would be required to comply with the current stormwater and other development regulations.

The Preferred Alternative would increase density in the areas surrounding Hamilton Street and in the northern residential area. With the enhanced multi-modal connectivity and streetscape improvements, there would be opportunities for implementation of green infrastructure, especially along Hamilton Street. Given the City's implementation of policies and requirements for wastewater and stormwater treatment, this projected population increase is not expected to have significant water quality impacts.

The Preferred Alternative would result in a similar amount of mixed-use intensification within the shoreline zone as Alternative 3: Southeast Riverfront from the DEIS. Any proposed development or redevelopment within the shoreline zone would be required to comply with the current SMP policies and regulations, as well as undergo additional evaluation for potential impacts to shoreline functions and the Spokane River. See Figure 6 for a map of shoreline zones within the study area.

3.4.3 Mitigation Strategies

The anticipated impacts to water resources and water quality from implementation of the Preferred Alternative are expected to fall within the same range as the Action Alternatives analyzed in the DEIS. As such, the mitigation proposed in the DEIS also applies to the Preferred Alternative.

The project prioritization matrix methodology in the Integrated Clean Water Plan includes project integration criteria and seeks to achieve and maximize several community benefits with every project. Benefits emphasized include environmental outcomes, community benefits such as improved streets, parks, and natural areas, economic development potential, operations and maintenance considerations, and life-cycle costs.

Construction BMPs would be required for all construction projects and include measures such as maintenance of construction equipment and street sweeping, which can reduce temporary stormwater pollution and other water quality impacts.



3.5 Biological Resources and Critical Areas

- 3.5.1 Existing Conditions
- 3.5.1.1 Relevant Policies and Regulations

1) Shoreline Management Act

The Shoreline Management Act (SMA) focuses on shoreline use, environmental protection, and public access. The City of Spokane implements the SMA through its Shoreline Master Program (SMP). The Spokane SMP provides shoreline designations and regulations for its shorelines in compliance with the requirements of the SMA. The Spokane River is regulated by the SMP and is within the study area. The Spokane River (within the study area) is located in the Campus/U-District and Upriver shoreline districts and is currently designated as Limited Urban and Urban Conservancy. See also Section 3.1.1.3 for additional detail, and Figure 6 for a map of shoreline zones within the study area.

2) Comprehensive Plan

• NE 1.7 Wellhead Protection

Allow only non-polluting land uses within the water recharge zones of the public water wells.

- NE 2.3 Native Tree and Plant Protection Preserve native vegetation in parks and other publicly owned lands in the design and construction of new public facilities.
- NE 6.1 Native and Non-Native Adaptive Plants and Trees Encourage the use of and development of standards for using native and nonnative adaptive plants and trees in landscape designs for public and private projects.

• NE 6.4 Fish and Wildlife Protection Continue to identify and protect those fish and wildlife and their habitats which are identified as a priority by citizens and scientific experts.

- NE 11.1 Identification of Natural Areas
 Identify natural areas throughout the city, based on neighborhood input, existing city-owned
 conservation lands, wildlife habitats, steep slopes, wetlands, riparian areas, adjacency to county natural
 areas, and proximity to state parks.
- **NE 11.4 Natural Area Paths** Develop soft, permeable, low impact paths in natural areas.
- NE 12.1 Street Trees

Plant trees along all streets.

- **NE 12.5 Tree Replacement Program** Do not allow tree removal in the public right-of-way without a program for tree replacement.
- NE 19.4 Discourage Development in 100-Year Flood Plain
 Discourage development and redevelopment of habitable structures that are within the 100-year flood plain.
- NE 15.1 Protection of Natural Aesthetics
 Protect and enhance nature views, natural aesthetics, sacred areas, and historic sites within the growing urban setting.



• NE 19.6 Downstream Impacts Consideration

Consider the downstream impacts created by development, erosion control devices, and public works projects within or adjacent to rivers and streams.

• LU 5.4 Natural Features and Habitat Protection Ensure development is accomplished in a manner that protects significant natural features and wildlife habitat.

3) Spokane Municipal Code

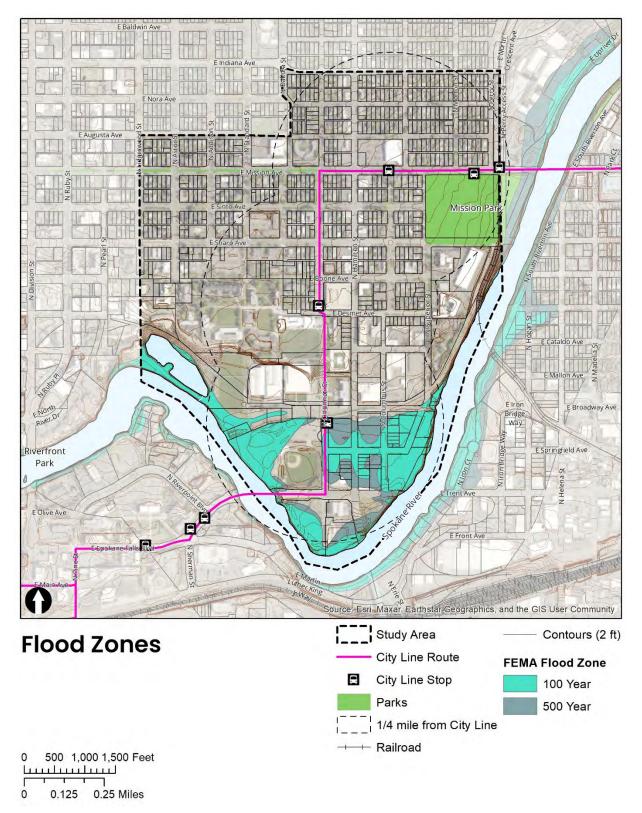
The Spokane Municipal Code regulates critical areas through Title 17E Environmental Standards. The code covers critical aquifer recharge areas and aquifer protection, fish and wildlife conservation areas, floodplains, geologically hazardous areas, shorelines, and wetlands. The critical areas found within the South Logan study area includes floodplains and critical aquifer recharge areas.

3.5.1.2 Flood Zones

Some of the southern portions of the planning area lie within the FEMA 500-year and 100-year flood zones. The areas adjacent to the Spokane River, the area immediately surrounding E Springfield Avenue, and portions of the Gonzaga campus are all in designated flood zones. The regulated flood zones within the study area are shown on Figure 11.



Figure 11 Study Area Flood Zones





3.5.1.3 Fish and Wildlife

The entire South Logan planning area has been developed to some extent, leaving very little natural habitat outside of the Spokane River itself. Vegetation in the area mainly consists of landscape varieties of trees, shrubs, and lawns.

There are no plant or animal species within the study area identified as threatened or endangered under the Endangered Species Act. The South Logan study area is included in an area identified as potential habitat for the big brown bat (*Eptesicus fuscus*). In the section around the study area, there are Westslope cutthroat (*Oncorhynchus clarki lewisi*), redband trout (*Oncorhynchus mykiss gairdneri*) and rainbow trout (*Oncorhynchus mykiss*) in the Spokane River. In addition, the parks and other landscaped areas provide habitat for animals typically found in urban settings, such as birds, rabbits, raccoons, and rodents.

3.5.2 Potential Impacts

The Preferred Alternative was evaluated for effects on existing and future biological resources and critical areas as compared to the Action Alternatives evaluated in the DEIS. Population growth in the neighborhood under any of the alternatives would proportionally increase the amount of development, but at different rates. All anticipated growth has the potential to affect biological resources and critical areas through site disturbance during construction and through land use activities after construction. All development would be required to comply with the current stormwater, critical areas, shorelines, and other development regulations. For additional information on potential impacts to shorelines and the Spokane River, see also Sections 3.1 Land Use and 3.4 Water Resources and Water Quality.

The Preferred Alternative would include increases in density in the areas surrounding Hamilton Street and in the northern residential area, similar to Alternative 2 from the DEIS. With the enhanced multi-modal connectivity and streetscape improvements, there would be opportunities for implementation of green infrastructure, especially along Hamilton Street and Springfield Avenue. The Preferred Alternative could increase the amount of vegetation and habitat for urban species in those areas as individual projects are implemented. The Preferred Alternative is not anticipated to have significant adverse impacts on biological resources or critical areas.

3.5.3 Mitigation Strategies

The anticipated minor impacts to biological resources and critical areas from implementation of the Preferred Alternative are expected to fall within the same range as the Action Alternatives analyzed in the DEIS. As such, the mitigation proposed in the DEIS also applies to the Preferred Alternative.

Individual projects proposed in the study area would be required to comply with the current stormwater, critical areas, shorelines, and other development regulations. No additional mitigation would be required.

3.6 Environmental Health

3.6.1 Existing Conditions

The U.S. Environmental Protection Agency (EPA) defines Environmental Justice (EJ):

Environmental justice means the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, rules, and policies. Environmental justice includes addressing disproportionate environmental health impacts in all laws, rules, and policies with environmental impacts



by prioritizing vulnerable populations and overburdened communities, the equitable distribution of resources and benefits, and eliminating harm.

This analysis looks at potential impacts on populations most vulnerable to environmental change, or EJ populations, within the study area, including minority populations, low-income households, and limited English proficiency (LEP) populations. The Office of the Assistant Secretary for Planning and Evaluation (ASPE) website identified the 2023 poverty guidelines for a four-person household equaling \$30,000 per year. LEP populations include people over five years old who self-report they speak a language other than English and speak English "less than well" in the US Census.

3.6.1.1 Relevant Policies and Regulations

1. Comprehensive Plan

- LU 5.2 Environmental Quality Enhancement Encourage site locations and design features that enhance environmental quality and compatibility with surrounding land uses.
- SH 4.1 Universal Accessibility Ensure that neighborhood facilities and programs are universally accessible.
- NE 13.1 Walkway and Bicycle Path System Identify, prioritize, and connect places in the city with a walkway or bicycle path system.
- NE 13.2 Walkway and Bicycle Path Design Design walkways and bicycle paths based on qualities that make them safe, functional, and separated from automobile traffic where possible.

2. Healthy Environment for All Act

As part of the Healthy Environment for All (HEAL) Act of 2021, the Washington State Department of Health (DOH) and other state agencies are taking steps toward eliminating environmental health disparities in Washington State. The law requires many state departments to consider environmental justice in their actions, plans, budgeting and funding, and outreach programs.

As part of those efforts, DOH is collaborating with the University of Washington (UW) Department of Environmental and Occupational Health Sciences (DEOHS) to produce a web mapping tool to help identify "where living and economic conditions combine with pollution to contribute to inequitable health outcomes and unequal access to healthy communities" (UW EOHS, 2023). It estimates a cumulative environmental health impact score for each census tract reflecting pollutant exposures and factors that affect people's vulnerability to environmental pollution. The model takes into account both threat (represented by indicators that account for pollution burden) and vulnerability (represented by indicators of socioeconomic factors and sensitive populations) to help compare health and social factors that may contribute to disparities in a community.

The mapping tool shows pollution measures such as diesel emissions and ozone, as well as measures like poverty and cardiovascular disease. Looking at these factors in combination shows that living in areas with more environmental hazards and population vulnerabilities is associated with a shorter lifespan. The population in census tracts with the lowest environmental health disparities (rank 1) on average lived 5.3 years longer than those in census tracts with the highest environmental health disparities (rank 10). The sections below discuss health risks and disparities in the study area, including environmental exposures, socioeconomic factors, and health outcomes. The South Logan study area lies entirely within Census block 0002500.



3.6.1.2 Demographic and Socioeconomic Context

The study area is approximated by U.S. Census tract 25.01, block group 2; tract 25.02, block group 2, and tract 25.03, block group 1. The study area is somewhat more racially diverse than the city as a whole, with about 29% non-White residents compared to 19% citywide. The largest non-White groups are Hispanic or Latino residents; proportionally these groups are about twice as large in the study area than in the city as a whole. In the study area about 82% of households (not including group quarters residents) speak English at home, with about 9% speaking Spanish at home and 9% speaking other languages, compared to 90%, 4%, and 6% citywide. A graphical comparison is shown in **Error! Reference source not found.**.

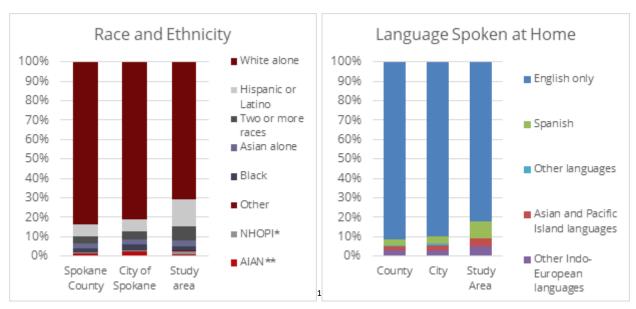


Figure 12 Race and Language Demographic Data

*NHOPI: Native Hawaiian and Other Pacific Islander

**AIAN: American Indians and Alaskan Natives

Source: ACS 2020 5-year estimates, Census 2020

Incomes in the study area are generally much lower than for the city as a whole, likely a result of the large student population. Relatedly, based on the ACS 2020 5-year estimates, a much higher proportion of the study area residents (58%) fall below the poverty line than citywide residents (13%).

According to census figures, a small majority – about 54% - of residents of the study area live in "group quarters;" this likely represents the student population living in Gonzaga University dorms. Of the residents that live in what are classified as "households," most live in non-family households, many with roommates. Approximately 2% of study area residents are children, compared to 24% citywide. Most households, in addition to all group quarters residents, are renters.





Figure 13 Household Demographic Data

Source: ACS 2020 5-year estimates

3.6.1.3 Environmental Exposures

Figure 14 shows the risk of environmental exposures in the study area. The study area ranks as a 10, indicating an overall very high risk of environmental exposures. Factors considered in the environmental exposures map include exposure to diesel exhaust PM_{2.5} emissions, ozone concentration, PM_{2.5} concentration, proximity to heavy traffic roadways, and toxic releases from facilities. The likely major contributing factor is the study area's proximity to large amounts of traffic on SR-290 (Hamilton Street south of Spokane Falls Boulevard) and I-90, which lies approximately 0.5-mile south of the study area.



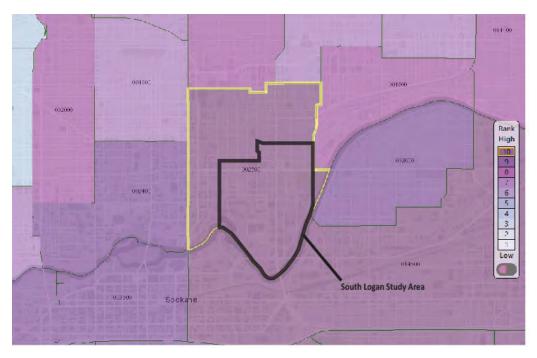


Figure 14 Environmental Exposures in the Study Area

3. Socioeconomic Vulnerability

Socioeconomic vulnerability in the study area is illustrated in Figure 15. The study area ranks as an 8, indicating socioeconomic vulnerability is moderately high. Factors considered in the socioeconomic vulnerability map include LEP census data, high school diploma attainment, people of color, population living in poverty, transportation expense, housing affordability, and unemployment.

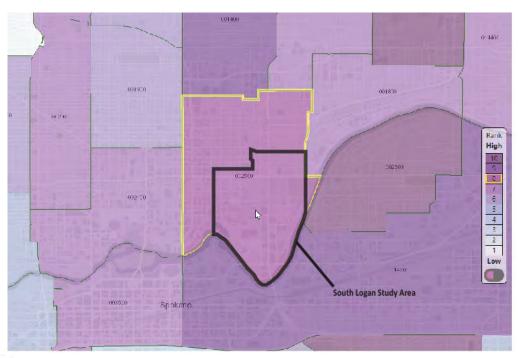


Figure 15 Socioeconomic Factors in the Study Area



4. Health Outcomes

Health outcomes in the study area are shown in Figure 16. The study area ranks as an 8, indicating the risk of poor health outcomes are moderately high in this area. Factors considered in the health outcomes map include cancer deaths, cardiovascular disease deaths, premature deaths, low birth weight, and lower life expectancy at birth.

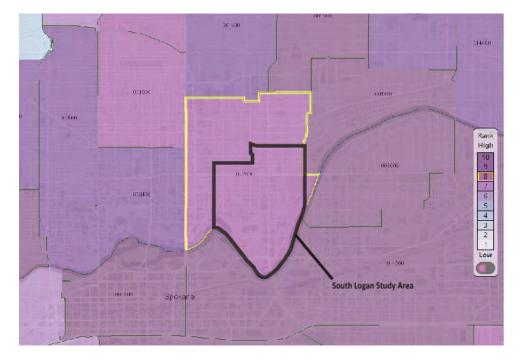


Figure 16 Health Outcomes in the Study Area

5. Health Disparities

Figure 17 illustrates the overall health disparities in the study area. The South Logan area ranks as a 10, indicating health disparities are very high overall. The factors from the individual categories considered in the health disparities map include social determinants, economic determinants, and poor health outcomes (as compared to those of other census blocks throughout the state).



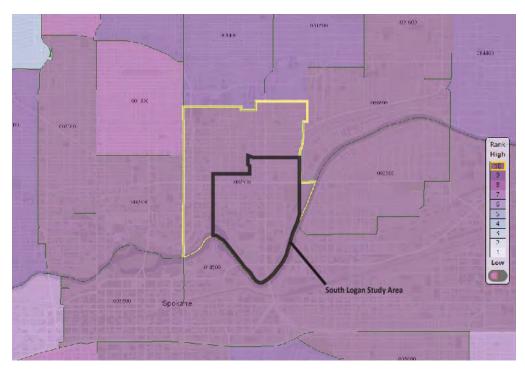


Figure 17 Health Disparities in the Study Area

The proximity to heavy roadways and exhaust emissions creates a very high risk for environmental health disparities in South Logan. The area also has a higher percentage of elderly and disabled population than citywide overall, which is more at risk for health disparities related to socioeconomic factors. South Logan also has a high percentage of young adults due to the university population, which could impact the overall inputs for assessing disparities. In general, students have lower incomes and a lower percentage of employment while in school.

3.6.2 Potential Impacts

The Preferred Alternative was evaluated for effects on existing and future environmental health as compared to those evaluated for the Action Alternatives in the DEIS. TOD, as proposed with the South Logan TOD Subarea Plan, creates benefits for environmental justice populations over the long-term by providing reliable and easily accessible public transit options, safer multi-modal facilities and better connections, a larger variety of housing options, and greater employment opportunities within the subarea. TOD principles conclude that transit-focused development can improve people's health by reducing negative impacts of long commutes, enabling active mobility, and fostering environments that improve mental, emotional, and physical well-being. For additional information on housing and anti-displacement, see Section 3.2 above.

Temporary construction impacts, with increased development and redevelopment, would be spread out over many years; however, temporary impacts from construction noise, dust, and traffic could have a greater effect on the South Logan study area due to the high risk for environmental health disparities. The specific effects would depend on the amount, duration, and type of construction activities.

Future growth could result in more people living near mobile and stationary sources of air toxics and particulate matter PM_{2.5}. The impact of the Preferred Alternative is that it would increase the potential number of people, or



other "sensitive receptors" located near existing sources of harmful air pollutants. For additional information on Air Quality in the study area, see Section 3.3 above.

The Preferred Alternative includes priorities for multi-modal improvements, traffic calming, streetscape improvements, and a significant increase in housing. This alternative focuses on enhancing neighborhood connections and livability. These changes, supporting increased access to transit and infrastructure upgrades, would benefit the environmental health of the neighborhood residents. The availability of community services would likely increase proportionally to the population growth expected under the Preferred Alternative.

3.6.3 Mitigation Strategies

To mitigate the potential environmental health impacts from temporary construction activities, the City could require enhanced public outreach to the community to inform them and seek input on projects as they are implemented. Outreach could include, but is not limited to:

- Public open houses to provide project information and access to city staff.
- Translation of informational materials into other languages, as needed.
- Providing alternative methods of information distribution, such as through community and service organizations, libraries, schools, employers, and transit agencies, as well as the standard electronic methods (website, email, social media, etc.).

Enhanced construction BMPs would also help reduce environmental health impacts, such as additional street sweeping to keep dust and debris from being tracked onto roadways, required emission controls on construction equipment, and limited hours for construction nearest sensitive noise receivers. See also mitigation for Air Quality impacts in Section 3.3.3.

3.7 Aesthetics, Light and Glare

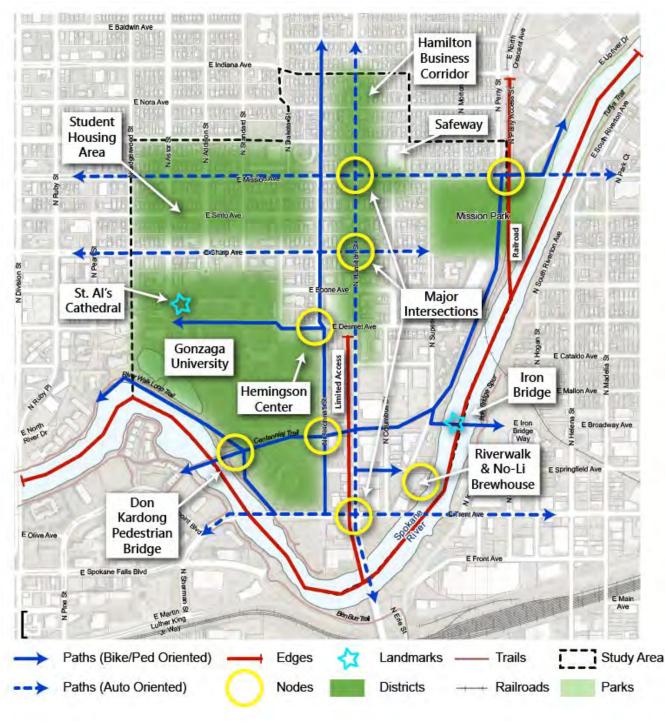
3.7.1 Existing Conditions

The study area has a range of land uses and development patterns which exhibit different aesthetic characteristics. The south end of the study area, generally south of Desmet Avenue, contains more commercial, institutional, and manufacturing uses, with few landscaped or open space areas other than the athletic facilities associated with Gonzaga University and the shoreline area (Figure 18**Error! Reference source not found.**). This portion of South Logan tends to have large, low, functional buildings with many paved or gravel lots. Buildings are unadorned and not maintained for physical appearance. North of E Desmet Avenue the predominant land uses are residential, with smaller, more finely detailed and decorated buildings, and more abundant plantings and open space (**Error! Reference source not found.**).

Many of the residential streets between Sharp Avenue and Mission Avenue have landscaped buffer strips with mature trees. Mission Avenue is a boulevard with four lanes of traffic separated by a planting strip with a row of mature trees in the middle. Mission Avenue is lined by a mix of detached houses, including some mansions, many of which have been converted to multi-tenant rentals, apartments including the income-restricted senior-housing O'Malley Apartments, the St. Aloysius Gonzaga Catholic School, and various low-scale commercial/retail spaces centered at the Mission Avenue-Hamilton Street intersection. In the western portion of the study area, the Gonzaga campus features a number of multi-story institutional buildings contributing to an urban university character.



Figure 18 Landmarks and Nodes Map



Source: SCJ Alliance



Figure 19 Example Neighborhood Photos



Top: Manufacturing buildings south of Desmet Avenue. Bottom: Residential areas north of Desmet Avenue. Source: MAKERS

There has been gradual development over the last two decades both on the Gonzaga campus and off campus. Off campus examples include a multi-restaurant development on Hamilton Street built in 2012, and two recent market-rate apartment buildings that were constructed in 2016, the 940 Apartments on Ruby Street and the Matilda Apartments on Hamilton Street, the latter which provides ground floor retail with three floors of multi-family housing above. On campus, Gonzaga has been developing their campus with more institutional facilities and student housing, including the McCarthey Athletic Center that opened in 2004. The most recent student housing as of 2023. The Boone Avenue Retail Center, also known as BARC, was built in 2014, and the university's student center, the John J. Hemmingson Center, was built in 2016, both located on Desmet Ave. The UW School of Medicine-Gonzaga University Health Partnership was the most recent building that opened in 2022, a \$60 million facility that provides classrooms, labs, offices and study spaces for the UW School of Medicine and Gonzaga's Department of Human Physiology. Much of the development in the last two decades has occurred on campus or immediately adjacent to campus. Some photos of recent developments are shown in Figure 20.



Figure 20 Recent Development in South Logan



Examples of recent development in South Logan: John L. Hemmingson Center, Joya Child, and Family Development, and the 840 Building. Source: Gonzaga University; MAKERS

Even with the recent development, most of the buildings throughout the study area are over 50 years old (Figure 21). There are a number of historically significant older buildings, including St. Aloysius Church, the Spokane and Inland Empire Railroad Car Facility (SIERR building), Cascade Laundry Building, the former Heath Branch of the Spokane Carnegie Library, Holy Names Academy building, and houses in the Mission Avenue Historic District. See also Section 3.9 Historic and Cultural Preservation for more information.

Figure 21 Examples of Historic Buildings in South Logan



Source: MAKERS; public domain

3.7.1.1 Relevant Policy and Regulations

1) Comprehensive Plan

The Spokane Comprehensive Plan addresses aesthetic issues primarily in Chapter 8 – Urban Design and Historic Preservation and Chapter 12 – Parks, Recreation, and Open Space.

Among the values listed in the Urban Design and Historic Preservation chapter are the following:

- Maintaining the natural beauty that makes Spokane distinctive, including the parks, waterways, treelined streets, and green areas;
- Preserving the historic buildings, historic fabric, and cultural heritage that provide Spokane with its character;
- Ensuring that new buildings in historic areas complement their surroundings; and
- Developing Spokane to be an attractive, clean city in which people take pride.



Comprehensive Plan policies related to Aesthetics in various chapters include:

• DP 1.3 Significant Views and Vistas

Identify and maintain significant views, vistas, and viewpoints, and protect them by establishing appropriate development regulations for nearby undeveloped properties.

• DP 2.16 On-Premises Advertising

Ensure that on-premises business signs are of a size, number, quality, and style to provide identification of the business they support while contributing a positive visual character to the community.

• DP 2.17 Billboards

Prohibit new construction of billboards and eliminate existing billboards over time.

• DP 2.21 Lighting

Maximize the potential for lighting to create the desired character in individual areas while controlling display, flood and direct lighting installations so as to not directly and unintentionally illuminate, or create glare visible from adjacent properties, residential zones or public right-of-way.

• PRS 1.5 Open Space Buffers

Preserve and/or establish areas of open space buffer to provide separation between conflicting land uses.

• ED 8.1 Quality of Life Protection

Protect the natural and built environment as a primary quality of life feature that allows existing businesses to expand and that attracts new businesses, residents, and visitors.

• NE 12.1 Street Trees

Plant trees along all streets.

• SH 3.3 Public Art Incentives

Provide incentives such as bonus densities or increases in floor-area ratio and lot coverage to encourage the use of public art in commercial, industrial, and mixed-use developments.

2) Logan Neighborhood Identity Plan

The Logan Neighborhood Identity Plan adopted in 2013 contains recommendations to establish neighborhood identity with streetscape improvements throughout the Hamilton Corridor, including the study area (Figure 22). Specific elements include:

- Intersection and controlled crosswalk paving
- Curb ramps
- Street lighting
- Street signage
- Neighborhood identification signage
- Public art



Figure 22 Example Images from Logan Neighborhood Identity Plan



Stamped Asphalt

3) Hamilton Form-Based Code

The Hamilton Form-Based Code (FBC) was adopted in 2015 with the intent to foster an economically vibrant, walkable, mixed-use environment along the Hamilton Street corridor. The FBC regulates land development by setting careful and coherent controls on building form, coupled with more relaxed parameters relative to building use and density (Figure 23). This greater emphasis on physical form is intended to produce safe, attractive, and enjoyable public spaces, including a healthy mix of uses. The code was designed to be a model that could be employed in other areas to foster TOD.

Objectives of the code include:

- Transforming the built character of the corridor to make it more attractive.
- Establishing clear design guidance to ensure development in the district is consistent with the neighborhood's vision for the area.



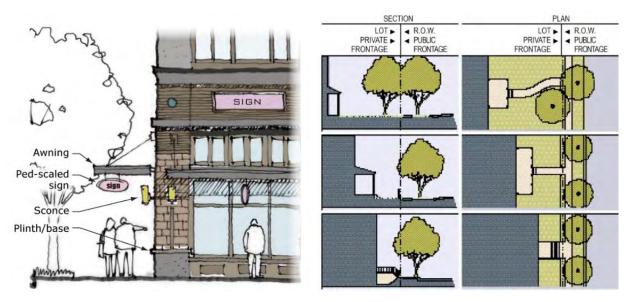
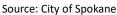


Figure 23 Example Architectural Requirements of Hamilton Form-Based Code



4) Design Review

The Design Review board has purview over public projects, projects that extend over a public right-of-way, and private projects that seek departures from design guidelines, including Center and Corridor Design Standards.

Design review is a process in which specific types of development proposals, or proposals seeking departures from existing design standards, are reviewed and evaluated based upon qualitative criteria that take into consideration such aspects as landscaping, pedestrian circulation, bulk, scale, and architectural context.

For development proposals that are already substantially compliant with the applicable design standards, and applicable design guidelines, design reviews and requests for design departures can be conducted by urban design staff through an Abbreviated Design Review. The urban designer's recommendations are reviewed and approved by the chair of the Design Review Board. For development proposals that are more complex in nature, design reviews and design departures are conducted by the Design Review Board through a Standard Design Review. The Design Review Board is comprised of citizens and practicing professionals who represent community interests including a diversity of design and technical professions. Board members are nominated by the Mayor, appointed by City Council, and serve without compensation. The Board's mission includes the following:

- Improve communication and participation among developers, neighbors, and the City early in the design and siting of new development projects subject to design review;
- Ensure that projects subject to design review under the Spokane Municipal Code are consistent with adopted design guidelines and help implement the City's comprehensive plan;
- Advocate for the aesthetic quality of Spokane's public realm;
- Encourage design and site planning that responds to context, enhances pedestrian characteristics, considers sustainable design practices, and helps make Spokane a desirable place to live, work, and visit;
- Provide flexibility in the application of design standards as allowed through design departures; and



• Ensure that public facilities and projects within the City's right-of-way wisely allocate the City's resources and serve as models of design quality.

5) Building Opportunity and Choices for All

The Building Opportunity and Choices for All pilot zoning program passed in July 2022 allows duplexes, triplexes, fourplexes and townhouses to be built in any residential zone, except Residential Agriculture. The measure includes design standards for new housing built, including standards for landscaping, front yards, usable open space, usable open space, street-oriented front entrances and windows, building articulation for larger buildings, screening for unsightly features like mechanical equipment and garbage areas, and measures to limit the visual impact of parking facilities. The design standards ensure that such low-intensity housing development is contextually sensitive for construction in existing residential neighborhoods. The interim ordinance was originally adopted for one year, and has been extended through December 18, 2023, to allow for the adoption of permanent regulations.

3.7.1.2 Transitions

Zoning districts in place in the study area are generally laid out to create gradual transitions between where high intensity uses and low intensity residential uses are allowed. The most intense zones, General Commercial 150 (GC-150) and Center and Corridor Type 1 – Employment Center (CC1-EC) are located in the southern end of the study area, while most of the north of the study area has low-intensity Residential 1 (R1) zoning. The Hamilton Form-Based Code (FBC) also allows higher intensity residential and/or commercial buildings along Hamilton Street, with lower intensity transitional zones east and west of Hamilton.

GC-150 and CC1-EC allow commercial, mixed-use, and residential buildings up to 150 feet in height. Both zones have transition standards in place that reduce allowed heights in proximity to R1 and Residential 2 (R2) zones.

3.7.1.3 Views

Comprehensive plan policy DP1.3 instructs the city to "identify and maintain significant views, vistas, and viewpoints, and protect them by establishing appropriate development regulations for nearby undeveloped properties."

One important view in the study area is the view of St. Aloysius Catholic Church, the tallest building in the study area, with twin spires that rise to approximately 140 feet (Figure 24). The church is visible from many points on Gonzaga campus and some public streets. Future development is unlikely to significantly impact the views of the church.





Figure 24 St. Aloysius Church, seen from one half block north on N Astor Street.

The Spokane River can be viewed from a few locations in the study area, but in most places is obscured by buildings and/or inaccessible to the public. Bridges, including the two pedestrian/bicycle bridges in the study area, and the Centennial Trail offer the best access to view the river at present.

6) Light and Glare

Manufacturing uses currently present in the study area likely produce significant light and glare at night. With a few exceptions just south of E Desmet Avenue, residential uses are generally not located adjacent to the manufacturing areas at present.

3.7.2 Potential Impacts

The Preferred Alternative was evaluated for effects on aesthetics, light, and glare compared to those evaluated for the Action Alternatives in the DEIS. Projects implemented under the Subarea Plan could change the look and feel of the existing Logan Neighborhood as business and building types change. The Preferred Alternative would allow larger buildings throughout portions of the study area including in areas currently zoned R1, R2 and CA-1 through CA-4 in the Hamilton FBC. Existing programs, policies, and regulations to ensure compatible building design would be in place, including commercial/residential transition standards, and design standards in residential, GC, and CC zones, and design review. While Design Review may be required for certain projects, all development is eligible for Design Review and Design Departures. These would be enhanced by design elements of revised zoning to implement the Subarea Plan.

Where changes in zoning allow building up to 150 feet, it is unlikely that future development will rise above seven or eight stories due to market dynamics, limiting the visual impact of new development adjacent to lower-intensity zones. Gradual replacement of manufacturing uses with residential, retail, and office uses in the southern part of the study area will likely reduce the impact of light and glare over time. Updates to



Source: Google Maps Streetview © 2023 Google

development regulations and design standards can encourage quality development that adds to neighborhoods' livability and overall aesthetics.

The Preferred Alternative would result in similar development activity as Alternative 4: TOD Emphasis, with new construction throughout the study area and the most significant changes happening in the SE Industrial area and along Hamilton Street. In some places, the Preferred Alternative would increase allowed heights to 75 feet, where the action alternatives only included heights of 70 feet. This change could result in a somewhat greater impacts to aesthetics than Alternative 4: TOD Emphasis, although the overall impact is still not significant.

Areas currently zoned R1 and R2 would be rezoned to allow multi-family buildings, likely resulting in scattered redevelopment of buildings that are taller, bulkier, or have greater lot coverage than what is allowed under current zoning (Figure 25). In these areas, gradual infill construction may result in increased shade and changes to the local aesthetic landscape for some properties that are adjacent to new development. Investments along N Columbus Street would improve the quality of the streetscape, which currently lacks consistent street trees, planting strips, sidewalks, or other pedestrian amenities south of Cataldo Avenue.



Figure 25 Existing Non-conforming Multi-family Building in R1 Zone

3.7.3 Mitigation Strategies

The anticipated aesthetics, light, and glare impacts from implementation of the Preferred Alternative are expected to fall within the same range as the Action Alternatives analyzed in the DEIS. As such, the mitigation proposed in the DEIS also applies to the Preferred Alternative. Development that is aligned with the policies set forth in the Spokane Comprehensive Plan, Logan Neighborhood Identity Plan, design standards and, where applicable, the established design review process will have no significant aesthetic impacts to the study area. In addition, the following actions will help to mitigate any remaining minor impacts.

3.7.3.1 Center and Corridor Code Updates

Updated development regulations for Center and Corridor zones, where the greatest amount of development is expected, should include review of and, where needed, updates to Center and Corridor design standards to



ensure that they adequately address building aesthetics and further promote TOD principles. Important factors to consider for aesthetics are those that have the most visual impact on passersby, such as apparent building width and ground-level details, as well as functional elements like utility infrastructure and parking areas. Design standards applied with zoning code may require buildings to break up massing through modulation or other strategies to reduce apparent building width. Design standards should also ensure detailed and visually interesting ground level floors on large new buildings and discourage visually prominent placement of utility and parking infrastructure.

3.7.3.2 Updates to the Hamilton Form-Based Code

The Hamilton Form-Based Code (FBC) includes robust standards for building form and design that mitigate any aesthetic impacts of new development. The Subarea Plan calls for strategic adjustments to the form-based code to enhance transit-oriented development opportunities, while retaining design measures to ensure that development is pedestrian-oriented and contributes to the context of the neighborhood.

3.7.3.3 Public Investments

Public investments offer opportunities to enhance aesthetics in the area, including access to views, and appropriate transitions. New public spaces or pathways and bridges should be designed to highlight views of the river and/or significant buildings where possible. Siting and design of public spaces can also help to transition between higher-intensity and lower intensity uses, or to break up concentrations of high-intensity uses. New utility or transportation infrastructure should be designed in such a way as to limit excess light on private properties at night. The design review process, which applies to public projects and projects in the public right of way will help achieve concurrence with design goals in adopted plans.

3.8 Recreation

3.8.1 Existing Conditions

Figure 26 below illustrates the existing park and recreational features of the South Logan study area, including Mission Park and the Witter Aquatic Center, the Centennial Trail, the North Bank Trail, the Cincinnati Greenway, the Spokane River Water Trail, and various Gonzaga University pathways described in this section.





Figure 26 Park and Recreation Facilities



Figure 27 Mission Park

3.8.1.1 Mission Park

Mission Park is the recreational anchor of the greater Logan Neighborhood (Figure 27). Amenities within this 13-acre park include a baseball field, tennis and pickle-ball courts, horseshoe pits, a playground, splash pads, plentiful open lawn areas, and a significant canopy of large deciduous trees. Witter Aquatic Center and the Spokane Lawn Bowling Club (which uses the historic former Spokane Public Bath House as its clubhouse) lie just to the east of the park across from the railroad tracks and just outside the study area boundaries. These attributes make the area a very active node for vehicles, freight, transit, bicycles, and pedestrians.



3.8.1.2 The Centennial Trail

The Centennial Trail is a major 40-mile regional bicycle and pedestrian route that serves travelers and recreation users (Figure 28). Approximately one mile of the trail runs through the study area. The trail is managed by Riverside State Park and maintained in partnership with the Friends of the Centennial Trail. From downtown, it passes through the Gonzaga University campus, crosses above-grade over Hamilton Street, and then follows the east edge of the study area up through Mission Park, joining up with Upriver Park, described below. The trail is used by nearly 2 million people per year, according to Visit Spokane, providing vital east-west connections from the study area to the larger region.



Figure 28 The Centennial Trail

3.8.1.3 North Bank Trail

There is also the North Bank Trail that follows the Spokane River along the southwest edge of the study area. This is a popular connection for many users of the Centennial Trail, providing a complementary route on the north side of the river.



3.8.1.4 Spokane River Water Trail

The Spokane River Water Trail is a water trail for the Spokane River founded by the Spokane River Forum that works with partners to develop and restore river access, including in South Logan at the SIERR Building and just outside of the study area at Upriver Park.

3.8.1.5 Gonzaga University Pathways

Gonzaga University's campus includes an expansive network of walking paths throughout campus that are regularly used by students, faculty, and community members as they go to and from classes, dorms, and study breaks (Figure 29).



Figure 29 Trails and Bike Paths in South Logan

3.8.1.6 Upriver Park

Just outside of the study area boundary, the Avista Corporation partnered with the City of Spokane Parks and Recreation to create a three-acre open space that provides public river access, water-based recreation, and ecological improvements. The park involved vacating Upriver Drive between Mission Avenue and North Center Drive, adjacent to the Avista headquarters, creating a linear parkway and separating the Centennial Trail from



vehicular traffic. An underpass for the Centennial Trail at Mission Avenue is in long-term plans to replace the existing at-grade crossing of five vehicular travel lanes.

3.8.1.7 Summary

With the 13-acre Mission Park and the Centennial Trail, the study area has two very significant recreational assets. The extensive Spokane River frontage is another great recreational asset, of which the North Bank and Centennial Trails and recent improvements surrounding the SIERR building take good advantage. Gonzaga University also provides tremendous recreational assets with publicly accessible trails and an open space network. Despite those assets, participants in the community planning process have noted the study area's lack of "community spaces." For example, there is no public school or public library in the study area.

3.8.1.8 Relevant Policy and Regulations

1) Comprehensive Plan

The Spokane Comprehensive Plan addresses recreation in Chapter 12 – Parks, Recreation, and Open Space.

The values listed for the Parks, Recreation, and Open Space chapter include the following:

- Providing and maintaining parks to serve all neighborhoods;
- Maintaining open spaces, golf courses, and trails;
- Being close to the outdoors, recreation, and nature;
- Providing recreation facilities and programs; and
- Maintaining linkages between parks, recreational facilities, and open spaces.

Notable Comprehensive Plan recreational policies related to the study area include:

• PRS 1.2 River Corridors

Protect river and stream corridors as crucial natural resources that need to be preserved for the health, enjoyment and responsible use and access of the community, consistent with the Shoreline Master Program.

• PRS 1.4 Property Owners and Developers

Work cooperatively with property owners and developers to preserve open space areas within or between developments, especially those that provide visual or physical linkages to the open space network.

• PRS 2.2 Access to Open Space and Park Amenities Provide linkages and connectivity of open space and park amenities.

• **PRS 3.1 Trails and Linkages** Provide trails and linkages to parks in accordance with city adopted plans.

- **PRS 3.2 Trail Corridor Development** Include landscaping, revegetation, and reforestation in trail corridor development where appropriate and desirable to provide a pleasant trail experience, compatible with adjacent uses.
- PRS 5.1 Recreation Opportunities Provide and improve recreational opportunities that are easily accessible to all citizens of Spokane.
- **PRS 5.6 Outdoor Recreational Facilities** Provide facilities and programs that allow the public the opportunity to participate in a broad range of outdoor recreational activities.



• PRS 1.5 Open Space Buffers

Preserve and/or establish areas of open space buffer to provide separation between conflicting land uses.

1. Parks and Natural Lands Master Plan

The City adopted the Parks and Natural Lands Master Plan in June of 2022. The plan took a fresh look at the parks and natural lands system and incorporated strategies to identify and address gaps and to develop park programming and partnerships to enhance recreational offerings. Key elements that relate to the study area are provided below.

The plan examined the number of parks and accessible acreage by classification divided by population to help determine the number of acres needed by 2037 to maintain the current acreage level of service. For example, the plan notes that 16 acres of neighborhood parks and 17 acres of community parks will be needed by 2037 to maintain the current acreage-based level of service.

Other notable findings in the Parks and Natural Lands Master Plan include:

- The plan's gap analysis map references that the southern portion of the study area is NOT within a 10 minute walk from parks or natural lands. This map, however, did not account for the Centennial trail's presence nearby.
- The City recently converted some of Mission Park's tennis courts to pickle-ball courts, which accommodate a higher intensity of recreationalists than tennis courts, and have become increasingly popular.
- Other key recreational gaps for Spokane's District 1 (which the study area is a part of) include:
 - o Dog park
 - o Disc golf course
 - o Sports equipment/fields
 - o Grill and picnic area
 - Mountain bike park/pump track and skate park
 - o Pickleball court
 - Therapeutic recreation services
 - o Trails for hiking and biking (paved and unpaved)
 - o Water access for kayak, raft, canoe, SUP
 - Wellness and enrichment programs
- Developing additional water access points was a prime objective for caring for and activating the Spokane River. Specifically, the plan suggested developing a fishing and a walking, biking, and rolling access point along the riverbank by the SIERR building. Also, recent walking, biking, and rolling access improvements were completed at Upriver Park adjacent to Avista.
- The plan included a number of strategies involving homelessness within the City's parks and recreational facilities and emphasizing park design that fosters positive interaction, as homelessness has been noted as a community concern for both Mission Park and the Centennial Trail.
- Putting the "park" back into the parkway boulevards is another key objective in maintaining and caring
 for the City's park and recreational assets. The plan references completing two pilot parkway projects to
 demonstrate different landscape treatments for improved appearance and sustainability and installing
 walking paths.



2. Shoreline Master Program

As redevelopment occurs for buildings along the Spokane River, expanded public river access for the public would be required per SMC 17E.060 Shoreline Master Program.

3.8.2 Potential Impacts

The Preferred Alternative was evaluated for effects on existing and future recreation uses as compared to those evaluated for the Action Alternatives in the DEIS. The Parks and Natural Lands Master Plan illustrates the number of acres of the various park classifications that would be needed to maintain current LOS standards in 2037 based on anticipated growth. Examining the LOS standards for neighborhood parks and total park acreage (Table 4) illustrates current conditions and surplus/gaps with respect to the park classifications by 2047 using the study area's existing and assumed population under the Preferred Alternative. The findings illustrate the challenge with using acreage-based LOS standards to determine future needs, especially for developed subareas like the South Logan study area.

	Existing	Preferred Alternative
Population	4,676	11,411
Neighborhood Parks, 13 acres – current City-wide LOS is 1.23 acres/1,000 population	LOS is 2.78 acres = 7.25-acre surplus	LOS is 1.14 acres = 1.03-acre deficit
Total park acreage , 13 acres (excludes golf courses, parkways & natural lands) – current City-wide LOS is 5.8 acres/1,000 population	LOS is 2.78 acres = 14.12-acre deficit	LOS is 1.14 acres = 53.18-acre deficit

Table 4 2047 Park Needs to Maintain LOS, Based on Population Projections

With a projected population increase of 6,735 by 2047 under the Preferred Alternative, the study area will have a deficit of over 53 acres of parkland. Even with Mission Park's 13 acres, the study area anticipates a small deficit of neighborhood parkland (1 acre) by 2047 in the Preferred Alternative. The demand for park and recreational space and features will increase similarly to Action Alternative 4 based on projected population. With Mission Park being the only publicly developed park space, the study area currently falls short of the city-wide LOS for total park acreage and would only get worse under the Preferred Alternative. Given the study area's urban nature and fixed boundary, meeting that standard will be increasingly unrealistic.

Development under the Preferred Alternative would enhance connectivity, particularly across Hamilton, and improve access to Mission Park from the larger study area. It also proposes to study options for improving river



crossings for bicycles and pedestrians in the vicinity of Mission Park. This includes enhancing the connection along Mission Avenue or constructing a new walking/biking/rolling bridge at Sharp Avenue.

An increase in allowed intensity around Mission Park and surrounding the Centennial Trail east and west of Columbus Street may create more "eyes on the park and trail" to provide some safety benefits. Similarly, the increase in intensity will likely increase use of both Mission Park and the Centennial Trail, possibly bringing some park facilities to capacity more often and creating more trail user conflicts.

3.8.3 Mitigation Strategies

3.8.3.1 Public Investments

The anticipated impacts to recreation from implementation of the Preferred Alternative are expected to fall within the same range as the Action Alternatives analyzed in the DEIS. As such, the mitigation proposed in the DEIS also applies to the Preferred Alternative.

Public investments offer opportunities to enhance recreational uses in multiple locations in the study area, most notably at Mission Park.

- Park improvements could include the integration of new facilities, upgrades to existing facilities, and new programming activities to encourage and accommodate more daily and event-based park usage and increase public safety.
- The generous Centennial Trail right-of-way also offers opportunities to add physical and visual amenities to encourage more trail use and enhance the setting for complementing private development adjacent to the trail.
- Public streetscape improvements are another opportunity that can both improve access to the park, trail, and riverfront and make the street function, in some special cases, as a recreational asset (the planned Columbus Street improvements in Alternative 3 from the DEIS are an example).

3.8.3.2 Public/Private Partnership Investments

There is potential for a number of public/private partnerships to enhance study area recreational opportunities:

- Alternative 3 in the DEIS emphasized the opportunity for public/private partnership developments, particularly in the riverfront area with large parcels/property ownerships. Such developments often have better opportunities of incorporating public plazas or pocket parks that are directly integrated into the development. The public side of the investment could come in a variety of forms, including streetscape improvements, or shared investment in park/plaza space.
- Considering the large area of public ownership on either side of the Centennial Trail and development potential on private parcels fronting the trail, there is tremendous potential for a public/private partnership in expanding the recreational amenities within the trail corridor, enhancing the context and visibility of the trail, and facilitating the desired TOD in this area.
- The riverfront properties also present an opportunity for such partnerships to provide enhanced water access and related riverfront amenities, particularly in the southeast riverfront area at Springfield Avenue. As redevelopment occurs, public access of some type would be required per SMC 17E.060 Shoreline Master Program.
- Collaboration with Gonzaga University regarding the use of some of their open spaces for broader community use.



3.8.3.3 Regulatory Changes and Related Private Investments

Regulatory changes that further emphasize pedestrian-oriented development might increase the likelihood of the integration of small plaza spaces, particularly near building entries, or even riverfront access/amenities. Such changes bring greater predictability to the future context and particularly with good communication with property owners and developers, could lead to the inclusion of such public amenity spaces, even if they are privately owned. While these spaces are likely to be smaller, they could still integrate a variety of small scale active and passive recreational amenities/features.

3.9 Historic and Cultural Preservation

3.9.1 Existing Conditions

The Spokane River, particularly the spectacular series of falls, has drawn people to the area for thousands of years and was the reason for both the Spokane Tribe of Indians' ancestors, and later, white settlement. The river provided an abundance of salmon, which sustained the region's indigenous peoples, the "Spokanes." Spokane ancestors were a river people, living a semi-nomadic way of life hunting, fishing, gathering. They lived along the banks of the Spokane and Columbia rivers and scattered up the tributaries in much of northeastern Washington, which consisted of approximately three million acres. During salmon runs, other tribes joined the Spokanes at the Falls for fishing, trade, games, celebration, and socializing.

3.9.1.1 1800's

In the 1800s, U.S. soldiers arrived and began displacing the Spokanes from their ancestral land as white settlement increased. Fur traders and missionaries were the first people of European descent to traverse the broader area of Spokane. In 1858, with no treaty established or adequate communications from the Federal

Government, the Spokane's defended their families and country as U.S. soldiers marched through their country. Settlement increased within the area in the 1870s as the first sawmill was built, followed by stores, churches, schools, banks, hotels, saloons, and a newspaper. In 1881, President Rutherford B. Hayes formerly established the Spokane Indian Reservation of approximately 154,602 land acres known as Chief Lot's reservation, which was located northwest of the present city. At the same time, Spokane was incorporated in 1881 with a population of about 1,000. From 1908, dams on the Spokane River displaced the Spokane Tribe's salmon-based way of life, further removing them from their ancestral homelands and way of life. In 1951, the Spokane Tribe officially became one of 574 recognized tribal governments within the United States following the passage of their formal Constitution that governs them today.¹⁰ Today the



Spokane Indian Camp along the Spokane River at present-day Redband Park. Credit: Washington State University Libraries, Manuscripts, Archives and Special Collections.

¹⁰ The History of the Spokane Tribe of Indians, https://www.spokanetribe.com/history/



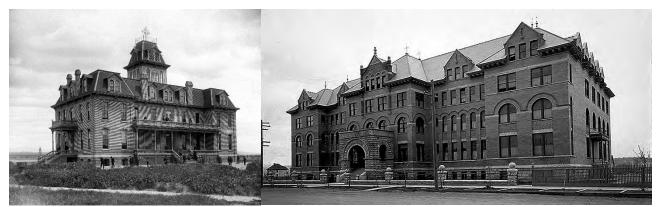
Spokane Tribe of Indians primary government operations are located in Wellpinit, WA with a citizen population of approximately 2,900 enrolled members.

The Logan Neighborhood was platted and developed between 1884 and 1890 by Sylvester and Ida Heath and the Jesuits of Gonzaga College. The area developed as a "suburb" of downtown Spokane. The pattern of wide streets and boulevard landscaping were introduced by the priests as a reflection on popular trends in Europe and cities of the eastern United States. The wide streets accommodated horse and buggy travel and pedestrians. Streetcar routes were laid in the early 1900s on Hamilton St and Boone Ave in front of the original Gonzaga College Hall.

3.9.1.2 Gonzaga University

Gonzaga University was founded in 1887 by an Italian Priest and Jesuit Superior of the Rocky Mountain Missions, Father Joseph Cataldo. He bought 320 acres in 1881 from the Northern Pacific Railroad with the intention to build a school for tribes that the Missions were serving plus any white settlers that might come to the region. While the school only had seven students when it opened, it quickly grew to 244 students and a faculty and staff of 24. The present St. Aloysius Church, then located on the edge of the campus, was dedicated in 1911. And the next year Gonzaga was granted legal status as a university by the Washington State Legislature. That same year, 1912, Gonzaga's School of Law opened its doors. The school continued to expand and evolve in the decades thereafter, welcoming women for the first time in 1948. The current enrollment is about 8,000, with faculty and staff of over 1,200 people in 105 buildings on 131 acres.

Figure 30 Historic Photos of Gonzaga's College Hall



(I) 1893 Original Gonzaga College Hall; (r) 1900 Administration Building (present-day College Hall). Source: Gonzaga University, College of Arts & Sciences Blog, "Time & Place: A Pictorial History of College Hall", url: https://blogs.gonzaga.edu/cas/2017/06/12/time-place-a-pictorial-history-of-college-hall/

3.9.1.3 Early 1900's and Industrial Legacy

Sanborn Fire Insurance Maps from 1910 illustrate extensive largescale industrial uses mixed with single-family homes in the southern portion of the study area. Several rail lines ran through the area and the street grid included several streets that don't exist today. The Spokane and Inland Empire Railroad Company Car Barns & Repair Shops, one of very few buildings in that area still standing today, stood in prominence on the north bank of the Spokane River. Further north, the McGoldrick Lumber Company Mill dominated the area, occupying 60 acres along the river south of Gonzaga University. Logs were stored on the river and milled lumber was dried in piles outdoors. The mill survived many fires until a 1945 fire leveled most of the plant. Figure 30, from a 2018 Spokesman-Review Then and Now article, illustrates conditions in 1941 (with the Gonzaga football stadium visible middle left) and in 2018 in nearly the same view. Other notable businesses visible in the 1910 maps



included a box manufacturing company, a sash and door factory, the Springston Lumber Mill, and the Pearl Steam Laundry.



Figure 31 Then and Now Photographs from Spokesman Review

Both images look southeast with the Spokane River on the right. The mill sits in the foreground in the 1941 image and Gonzaga University occupies most of the mill property in the 2018 image.

Source: Spokesman-Review photo archive (left image), Jesse Tinsley (right image), Then and Now: McGoldrick Lumber, Spokesman-Review, July 16, 2018

3.9.1.4 Hamilton Street Onramp

One notable feature not on those 1910 Sanborn Fire Insurance Maps was the Hamilton Street onramp, which wouldn't be constructed for another 74 years. In 1970, Hamilton Street saw about 14,400 cars per day. That year, the Spokane Metropolitan Area Transportation Study recommended a freeway be built literally on Hamilton Street to help alleviate the heavy traffic on Division Street. The plan had been discussed for decades, and WSDOT had already built the on- and off-ramps for the freeway on I-90 just to the south. Washington State Senator Margaret Hurley, who represented this area, organized opposition to the freeway because it would have blazed a route through the densely populated neighborhood near Gonzaga University. While this opposition stopped the north-south freeway using the Hamilton Street route, the existing Hamilton Street bridge was constructed in 1984 with the construction for the North Spokane Corridor finally breaking ground farther east in the early 2000s. While the bridge more than doubled the traffic on Hamilton Street, it had very little impact on Division Street's traffic flow.

3.9.1.5 Context From the 1980 Logan Neighborhood Design Plan

The 1980 Logan Neighborhood Design Plan provided some informative details about how the neighborhood has evolved:

- Replacement of the turn of the century housing stock with new poorly designed apartment buildings was perceived as a real threat to the neighborhood's character.
- The neighborhood's arterials, while they are critically important in moving people around the city, create very significant divisions within the neighborhood.
- Gonzaga University and other institutional uses create a mix of benefits and impacts in the context of neighborhood development. The university campus had expanded northward over time to the extent that some blocks between Boone and Sharp Avenues are almost entirely institutional uses.



• Commercial development along Hamilton Street needed visual improvement, including landscaping and sign design guidelines.

3.9.1.6 Historic Properties

A historic property in Spokane may be listed, either individually or as a contributing structure in a district, on the Spokane Register of Historic Places, or the National Register of Historic Places. While a nomination to either register requires review by the Spokane Historic Landmarks Commission, these two distinct registers provide different management guidelines and tax incentives for listed properties.

The Spokane Register of Historic Places (SRHP) is the City of Spokane's local official list of properties that have been designated as significant contributors to the historical development of Spokane. The Register was established by ordinance in both the City and County of Spokane in 1981 and 1982, respectively. These ordinances deem the City/County Historic Landmarks Commission responsible for the stewardship of historic and architecturally significant properties. Nominations to the Spokane Register must be accompanied by owner consent, and eligibility for the Spokane Register is generally reserved for properties 50 years of age or older and is determined by established criteria. Owners of properties listed on the Spokane Register of Historic Places agree to follow Management Standards and the Secretary of the Interior's Standards for Rehabilitation outlined in their "Management Agreement." This agreement states than an owner must obtain a Certificate of Appropriateness (COA), or approval, for any action affecting use, exterior appearance, new construction or demolition of the designated historic structure. It's important to note that normal maintenance or repair does not require design review if no changes are made to the exterior appearance of the building. Properties must be located on the Spokane Register of Historic Places or be a contributing property in a Spokane Register Historic District in order to access incentives such as Special Tax Valuation (10-year property tax reduction incentive) or the Facade Improvement Grant Program.

The National Register of Historic Places (NRHP) serves as the Federal government's official list of those properties deemed worthy of preservation. Listing on the National Register is primarily a tool to encourage preservation, recognition, and rehabilitation of our national landmarks. There are over 100 properties in Spokane that are listed on the National Register of Historic Places, often in concurrence with listing on the Spokane Register. While local tax incentives may only be available to properties listed on the Spokane Register of Historic Places, there are several Federal incentives available for individually listed National Register landmarks and contributing structures of historic districts.

The National Register does not require the owner to preserve or maintain the property and does not guarantee preservation of the property. The owner is not required to preserve the property, nor is the property protected from the effects of state and local projects, unless Federal funding or licensing is involved. Unless the owner applies for and accepts special Federal benefits, the property owner can do anything with the property that they wish, so long as it is permitted by state and local law. In Spokane, contributing properties in National Register Historic Districts are subject to a Certificate of Appropriateness for demolition. If demolition of a contributing property within a National Register Historic District proceeds, any replacement structure must be approved by the Spokane Historic Landmarks Commission prior to the issuance of a demolition permit (Section 17D.100.230). The study area features the Mission Avenue National Historic District, as well as several individual properties designated on the NRHP and SRHP in the South Logan study area as set forth in Table 5 and shown on Figure 32.



Property Name	Common Name	Address	Register	Year Built	Year Designated
Holy Names Academy	Academy Apartments	1216 N Superior St	NRHP SRHP	1891	1985
Spokane and Inland Empire Railroad Car Facility	SIERR Building	850 E. Spokane Falls Blvd	NRHP SRHP	1907	2010
Spokane Carnegie Library, Heath Branch	Catholic Diocese of Spokane	525 E. Mission Ave	NRHP SRHP	1913	1982 & 1985
Clark House	George & Clara Clark House	511 E. Mission Ave	NRHP SRHP	1903	1986 & 2007
Sheehy-Kelleher House	Same	429 E. Mission Ave	NRHP SRHP	1934	1986 & 2007
Mele House	Same	302 E. Mission Ave	NRHP SRHP	1923	1986 & 2008
Gibbs House	Chester Gibbs House	308 E. Mission Ave	NRHP SRHP	1904	1986 & 2007
Cascade Laundry Building	Riverwalk Building	1003 E. Trent Ave	SRHP	1913	2008
Snappy Beer Parlor	Jack & Dan's	1226-1228 N. Hamilton St	SRHP	1909	2006
Heath House	Same	1017 E. Mission Ave	SRHP	1889	1984
Lane House	Same	630 E. Mission Ave	SRHP	1904	1986

Table 5 Properties designated on the NRHP and/or SRHP in the South Logan Study Area

Other notable structures and features that function as neighborhood landmarks or character defining traits, but are not officially registered landmarks include:

- Gonzaga University (collectively, including its range of buildings built over a long period, open spaces, and pathways)
- Mission Park
- St. Aloysius Catholic Church (its tall steeples are visible from great distances)
- St. Aloysius Gonzaga Catholic School
- Mission Avenue Boulevard (notably the wide center medians)
- The established character of the platted residential neighborhood, including the mature tree-lined streets and landscaped setbacks, and human-scaled dwellings with porches, covered entries, and pitched rooflines.



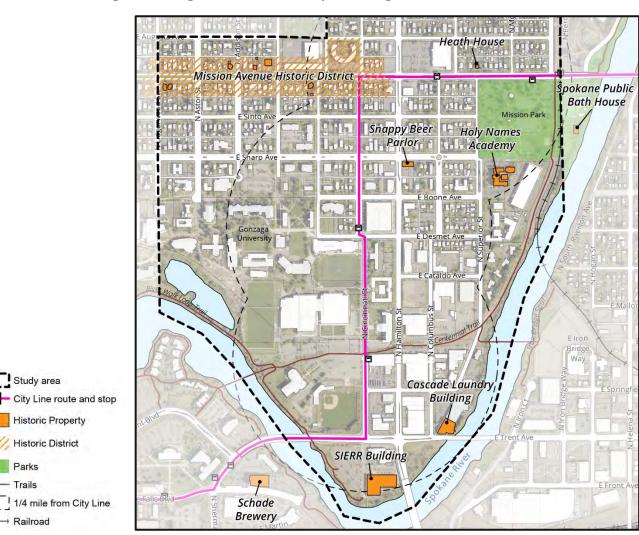


Figure 32 Designated National and Spokane Register of Historic Places

Source: City – County of Spokane Historic Preservation Office, MAKERS

3.9.1.7 Policy and Regulations

1) Comprehensive Plan

The Spokane Comprehensive Plan addresses aesthetic issues primarily in Chapter 8 – Urban Design and Historic Preservation and Chapter 12 – Parks, Recreation, and Open Space.

Applicable "values" listed for the Urban Design and Historic Preservation chapter include the following:

- Maintaining the natural beauty that makes Spokane distinctive, including the parks, waterways, treelined streets, and green areas;
- Preserving the historic buildings, historic fabric, and cultural heritage that provide Spokane with its character; and
- Ensuring that new buildings in historic areas complement their surroundings.



One notable policy emphasizes assisting neighborhoods and other potential historic districts to identify, recognize, and highlight their social and economic origins and promote the preservation of their historic heritage, cultural resources, and built environment.

The Shoreline Chapter includes a goal to preserve the historic, cultural, scientific, or educational sites within the shoreline that reflect our community's unique heritage and create or contribute to our collective sense of place. Related policies address:

- Cooperation and consultation with affected agencies, tribes, and the City of Spokane Historic Preservation Department for projects that could potentially harm cultural and historic resources.
- Work with tribal, state, federal and local governments as appropriate to maintain an inventory of all known significant local historic, cultural, and archaeological sites.
- Encouraging interpretive signage reflecting the history and culture of shorelines.
- Strategic site and building acquisition and incentives for property donations.
- Public access and educational opportunities.

2) Historic Preservation Standards

Spokane Municipal Code Chapter 17D.100 addresses historic preservation standards. This chapter includes (among other detailed provisions):

- Criteria, instructions, and procedures for City historic landmark designation;
- Property management and design standards agreement;
- Standards and permitting process for proposed demolition, relocation, or changes to a landmark structure; and
- Incentives.

3) Zoning District Development Standards

New development in each of the study area's zoning districts are subject to some form of development that aim to ensure some level of compatibility with the established character:

- Residential zones are subject to provisions in SMC Chapter 17C.110 and include basic standards for building coverage, height, setbacks, fences, parking and loading, landscaping, and screening.
- Multifamily development within Residential zones is subject to special design standards in SMC Chapter 17C.110.400, which cover elements such as façade articulation and details, building entrances, windows, sidewalk design, and screening.
- Institutional development (Gonzaga University) is subject to the Institutional Design Standards in SMC Chapter 17C.110.500, which cover issues similar to those for multifamily development plus lighting, buildings along streets, massing, and historic context considerations.
- Development within the General Commercial zone are subject to design standards in SMC Chapter 17C.120.500, which cover issues similar to multifamily and institutional development plus ground floor windows, ground level details, roof expression, and plazas and other open spaces.
- Development within the Center and Corridor zone are subject to provisions in "Design Standards and Guidelines for Center and Corridor", which cover issues similar to those in the General Commercial zone, but further emphasize pedestrian-oriented development and provide a greater level of detail and graphic support than in the Commercial Zone's design standards.



• Design standards for the Hamilton Form-Based Code, which are detailed in Sections 3.1.1.2 and 3.7.1.1.

4) Design Review

Owners of properties listed on the Spokane Register of Historic Places agree to follow Management Standards and the Secretary of the Interior's Standards for Rehabilitation outlined in their "Management Agreement." This agreement states that an owner must obtain a Certificate of Appropriateness (COA), or approval, for any action affecting use, exterior appearance, new construction or demolition of the designated historic structure. Improvements are reviewed and approved by the Spokane Historic Landmarks Commission, a body of private citizens charged with the preservation and protection of Spokane's historic, architectural, and archaeological resources, or the Historic Preservation Officer through an approved and transparent process.

Additional details on Design Review can be found in Section 3.7.1.1.

3.9.2 Potential Impacts

Zoned capacity increases proposed in the Preferred Alternative will increase pressure for redevelopment. The combination of existing and proposed updated development and design standards will help preserve designated historic structures and ensure that new development includes some measures that help promote compatibility with the surrounding context. The Preferred Alternative assumes continuation of the interim housing ordinance design standards, which provide an additional layer of site and building design provisions to help ensure compatibility.

3.9.3 Mitigation Strategies

Beyond those provisions making the interim housing ordinance permanent (including applicable multifamily design standards), additional changes to the zoning district design standards could be made to further promote design that retains and enhances the established character of the residential neighborhoods. Examples could further address façade articulation, roofline treatments, entry design, and front yard landscaping.

3.10 Transportation

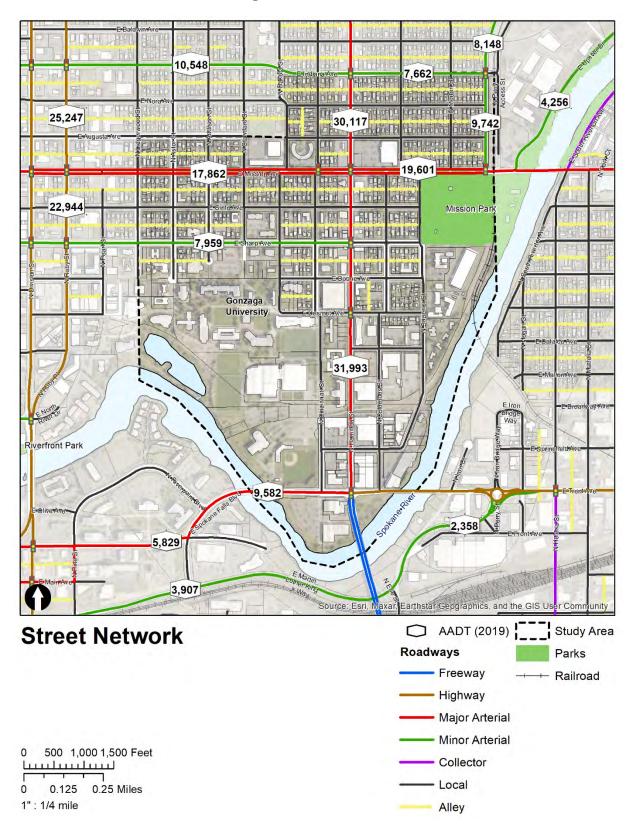
3.10.1 Existing Conditions

3.10.1.1 Roadway Network

The study area's transportation network (Figure 33) primarily consists of a grid-like street pattern, with streets classified as Highways, Major and Minor Arterials, Collector, and Local Roadways. Additionally, the I-90 ramp south of Hamilton Street is classified as a Freeway. The highest vehicle volumes are found along E Mission Avenue, an east-west major arterial, and N Hamilton Street, a north-south major arterial. In 2019, the average daily traffic (ADT) on E Mission Avenue was approximately 19,600 vehicles per day near Mission Park. The greatest traffic volumes were near Gonzaga University, with approximately 32,000 vehicles per day along N Hamilton Street from E Mission Avenue to the SR 290 ramp, which crosses the river to connect with I-90.



Figure 33 Street Network





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Since June 2020, the Trent Street Bridge, which is part of SR 290, has been fully closed for construction. The East Trent Bridge spanning over the Spokane River near Gonzaga University campus was due for replacement, and Washington Department of Transportation demolished and rebuilt a new bridge in its place. There were several detours that drivers had to follow that impacted other local streets until project completion, which is expected in 2023. N Hamilton Street, E Mission Avenue, E Spokane Falls Boulevard, and E Trent Avenue/SR 290 are included within the National Highway System (NHS). Table 6 summarizes the existing characteristics of major and minor arterials in the study area. The North Spokane Corridor (NSC) and Division Connects projects, which will significantly impact traffic patterns in South Logan, are discussed in Section 3.10.2, below.

Roadway	Roadway Classification	Number of Travel Lanes	Speed Limit (mph)	2019 Average Daily Traffic (ADT)	Bicycle Facilities	Pedestrian Facilities
E Mission Avenue	Major Arterial	4	30	19,601	None	Yes
N Hamilton Street	Major Arterial	4	30	31,993	None	Partial
E Spokane Falls Boulevard/ E Trent Avenue (SR 290)*	Major Arterial/ Highway	4	30	9,582	Partial	Yes
E Sharp Avenue	Minor Arterial	2	25	7,959	Bike Lanes	Yes
N Perry Street	Minor Arterial	4	30	9,742	None	Partial
E Indiana Avenue	Minor Arterial	2	30	10,548	Bike Lanes	Yes

Table 6 Major Roadways in the Study Area

*Note: The SR 290 ramp has the speed limit of 40 mph from I-90 to the Hamilton/Trent intersection, where it decreases to 30 mph.

3.10.1.2 Transportation for People Who Walk, Bike, or Roll

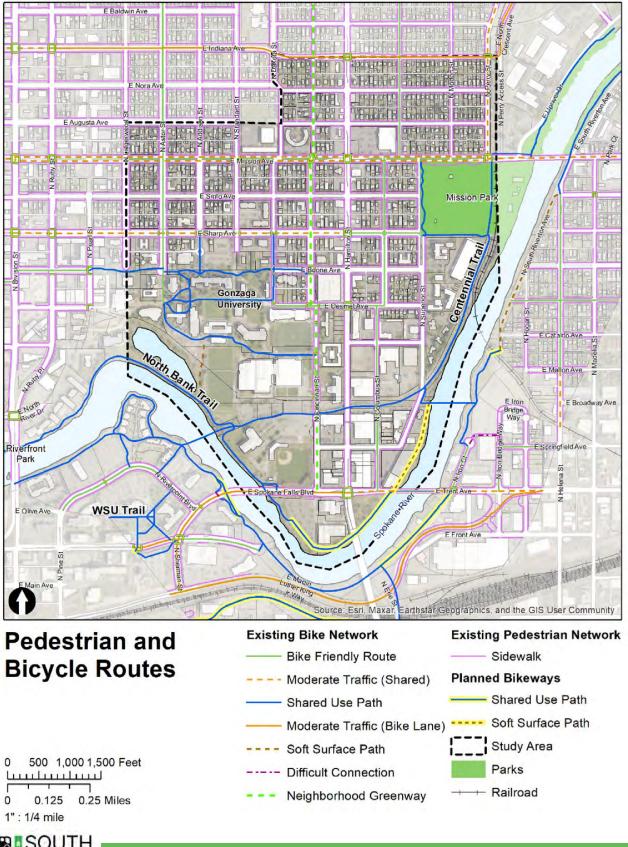
Figure 34 displays the existing networks for walking and bicycling in the study area. Major bicycle facilities include the N Cincinnati Street neighborhood greenway and bike lanes along E Spokane Falls Boulevard, which connect the study area to neighborhoods across the river. Other important bike facilities include the recent bike lane and traffic calming installations along Sharp Avenue and Indiana Avenue, which feature lane reallocations as well as curb extensions and medians integrated with stormwater facilities. Shared-use paths, including the North Bank Trail, the Ben Burr Trail, the Riverton Avenue Pathway, and the Spokane River Centennial Trail, border sections of the Spokane River and traverse the Gonzaga University campus.

1) The Centennial Trail

The Centennial Trail is an approximately 40-mile paved recreational trail for people who walk, bike, or roll. Approximately one mile of the trail runs through the study area, connecting it to Downtown Spokane. A portion of the Centennial Trail crosses Upriver Park, where the shared use path is separated from vehicular traffic along a section of the recently vacated Upriver Drive, between Mission Avenue and North Center Drive. Wide sidewalks and shared-use pathways through the Gonzaga campus further improve the permeability of the study area for walking and bicycling. Pedestrian bridges, such as the Don Kardong Bridge and the Iron Bridge, provide critical east-west links into the project area from adjacent neighborhoods and nearby businesses, while the South University District Gateway Bridge connects nearby to areas south across the Spokane River, including the South University District and nearby medical centers. Sidewalks are present along almost all roadways in the



Figure 34 Pedestrian and Bicycle Routes





study area, although the quality of facilities varies throughout the study area and some infrastructure gaps exist. Some sidewalks are located immediately adjacent to the travel lane, whereas others provide a separation from traffic lanes.

Pedestrian-scale lighting is present along roadways segments, including N Hamilton Street, E Sharpe Avenue, and E Spokane Falls Boulevard. Segments of E Sharp Avenue include a landscaped buffer between traffic and sidewalks. Southern segments of N Hamilton Street are generally curbside.

The Centennial Trail Hamilton Street Overpass is an existing overpass for the Centennial Trail over N Hamilton Street. It poses a challenge for many users due to the steep incline of the ramps, which the City estimates to be an approximate 8% slope. This steepness may make it difficult for some individuals, such as those with limited mobility, those who use mobility aids like wheelchairs, or those using strollers or bikes. As a result, the overpass may act as a barrier for some users and discourage them from utilizing the trail in this section or route them farther north or south to find a safer crossing. Recent upgrades of the rectangular rapid flashing beacon (RRFB) at the intersection E Desmet Avenue and N Hamilton Street, located two blocks north of the Overpass, to a full signal with bicycle detection improved the safety and ease of crossing N Hamilton Street for people walking, bicycling, and rolling.

In 2014, the City of Spokane's *Centennial Trail Gap, Mission Avenue Crossing* plan studied the crossing of E Mission Avenue at Upriver Drive. From Mission Park, Centennial Trail users are faced with a BNSF railroad track crossing, a challenging pedestrian crossing, and a tight right turn next to congested west-bound traffic to reach Upriver Drive. The study presented conceptual designs for further consideration, including a pedestrian island that was completed in 2018, a bridge over E Mission Avenue, and a trail tunnel under the BNSF tracks in Mission Park. The City's *2023-2028 Citywide Capital Improvement Program* includes a grade-separated crossing option for those who walk, bike, and roll. The Friends of the Centennial Trail have identified proposed projects on the Centennial Trail through this area.

3.10.1.3 Safety

From 2017 to 2021, there were approximately 450 vehicular crashes within the study area, with an average of 85 crashes each year. Over half of the crashes occurred at an intersection, as shown in Figure 35. Most of the crashes occurred along N Hamilton Street and E Mission Avenue, which carry the highest volumes of vehicular traffic throughout the study area. The crash history for this time period is detailed in Table 7 by user type.

Year	Total Annual		Crashes by User Type	
Tear	Crashes	Pedestrian	Bicyclist	Vehicular
2017	102	4	2	96
2018	75	3	0	72
2019	106	3	6	97
2020	77	5	2	70
2021	91	4	1	86

Table 7 Study Area Crash History (2017-2021)

Source: Washington Department of Transportation, 2017-2021.

Note: Irregularities in data in 2020 may be due to the COVID-19 pandemic, under which reduced vehicular traffic resulted in fewer crashes.









Crashes with people who walk, bike, or roll make up a small number of the overall crashes within the study area (Table 7). The two fatal crashes within the study area involved pedestrians crossing an intersection. Figure 36 shows crashes with people who walk, bike, or roll from 2017 to 2021. The majority of crashes for all road users, whether walking, bicycling, or driving, occurred along E Mission Avenue and N Hamilton Street. Both streets share the characteristics identified in the City's Risk-Based Safety Assessment as high-risk for pedestrian and bicycle crashes, with multiple lanes of high-speed traffic with infrequent spacing of safe crossing points for walking or bicycling. In 2019-2020, the City reconstructed all the signals and implemented protected-permitted left turn phasing to enhance safety along N Hamilton Street. Additionally, the RRFB at E Desmet Avenue, which was linked to at least two pedestrian accidents, was replaced with a full signal.

Veer	Total Serious	User Type		Total Fatal	User Type	
Year	Injury Crashes	Pedestrian	Vehicular	Crashes	Pedestrian	Vehicular
2017	2	1	1	-	-	-
2018	-	-	-	-	-	-
2019	-	-	-	-	-	-
2020	1	1	-	2	1	1
2021	1	-	1	1	1	-

Table 8 Serious Injuries and Fatalities (2017-2021)

1. Source: Washington Department of Transportation, 2017-2021

3.10.1.4 Public Transportation

STA provides transit service throughout the study area. There are four existing transit routes with service in the study area. Routes 26 (Lidgerwood) and 28 (Nevada) provide connections from downtown Spokane to the Northpointe Shopping Center and Whitworth University following east-west on Mission Avenue and then north-south on Hamilton Street at Mission Avenue. Both are basic routes with service every 30 to 60 minutes during weekdays, but which, combined, provide frequent transit service (every 15 minutes) along the section of N Hamilton Street within the study area. Route 39 (Mission) was replaced in service by the City Line in the Logan Neighborhood, and provides east-west connections along E Mission Avenue and north-south on Cincinnati Street, connecting downtown Spokane to Spokane Community College. Changes to the existing transit system, including the launch of City Line route through the study area, are discussed further in the following section.



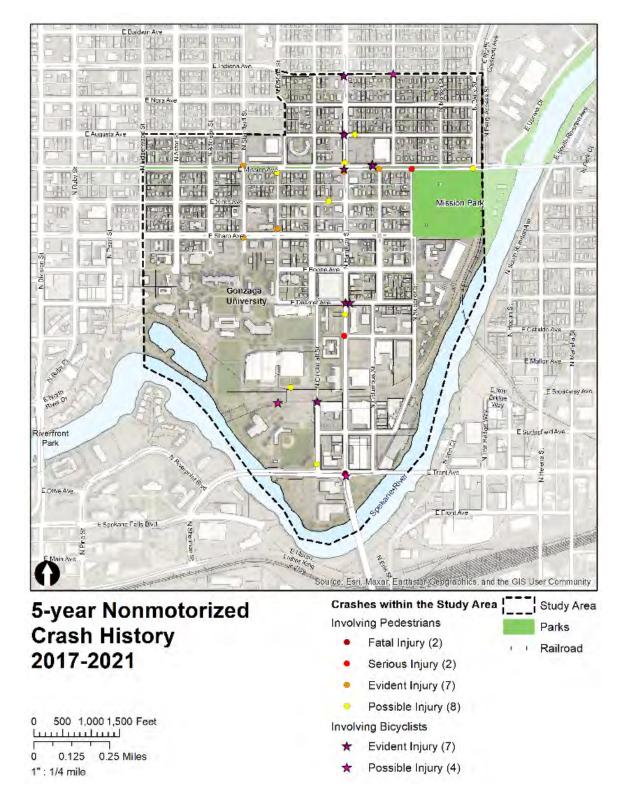


Figure 36 5-Year Crash History for People who Walk, Bike, or Roll



3.10.2 Potential Impacts

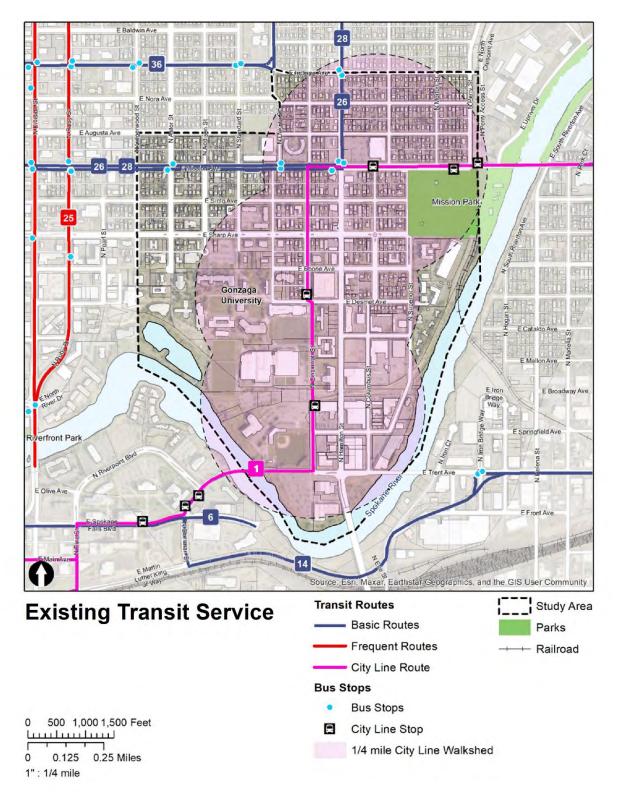
The Preferred Alternative was evaluated for effects on the transportation network as compared to those evaluated for the Action Alternatives in the DEIS, including a No Action alternative and three Action Alternatives that include various changes to allowable building heights, intensity, and investments to improve walking and riding connections throughout the neighborhood, especially across Hamilton Street. The intersections of N Hamilton Street/E Trent Avenue and the ramps at the N Hamilton Street/I-90 interchange were selected for additional analysis to identify traffic related impacts related to potential land use changes by the preferred alternative. This section summarizes key findings of impacts from the Preferred Alternative and mitigation strategies.

The City is planning for mixed-use and walkable places along the STA's City Line, Spokane's first Bus Rapid Transit (BRT) route. The City Line (**Error! Reference source not found.**) connects Browne's Addition to Spokane Community College, serving downtown, the University District, and Gonzaga University. The fast, reliable connections increase mobility and access within South Logan for visitors and residents. Within the study area, City Line provides service along Cincinnati Street and E Mission Avenue. Over half of the study area is within a quarter (0.25) mile walkshed of the City Line, which began service in July 2023. Gonzaga University has a robust Commute Trip Reduction (CTR) program that includes free transit passes for all students, faculty, and staff, a rideshare matching service, and designated spots and reduced parking charges for carpoolers.

Outside of the subarea, major transportation projects assumed in the No Action include the Division Connects (Division Street BRT) and the NSC, as planned in the Division Connects project. Division Street BRT will convert the approximately nine miles of the existing Route 25 to BRT service, with new stations and roadway modifications that will provide faster and more reliable zero-emission bus service. Construction is expected to be complete with service implemented by 2029. The NSC will be a 10.5-mile, north/south limited access facility that connects I-90 at the south (just west of the existing Thor/Freya interchange) to US 2 at Farwell Road and US 395 (at Wandermere) on the north end. Construction is expected to be complete by 2030. Consistent with travel demand modeling and traffic forecasting conducted as part of the Division Connects project, it was assumed the NSC will pull regional traffic away from N Hamilton Street. The Division Connects analysis assumed average daily north-south vehicle trips in 2045 are reduced by an average of 21 to 23 percent, and average daily person trips in 2045 are reduced by an average of 15 to 17 percent.



Figure 37 Current Transit Network





Transportation elements within all Action Alternatives include bicycle and pedestrian facilities along segments within the South Logan study area and at crossings of major roadways. Key features of all Action Alternatives would include the following:

- Bicycle and pedestrian improvements are expected to expand access and mobility for people walking, bicycling, and rolling.
- The installation of an enhanced crosswalk at the intersection of N Hamilton Street and Springfield Avenue would provide an alternative, at-grade crossing of N Hamilton Street for the Centennial Trail that is close to the City Line McCarthey Athletic Center Station. Pedestrian enhancements would improve bicycle and pedestrian access to the City Line BRT for transit customers on the eastern side of the study area.
- Increased residential and commercial intensities would impact mode shift towards walking, cycling, and public transit with less reliance on single-occupancy vehicle (SOV) use within the South Logan area.
- Enhanced pedestrian crossings of N Hamilton Street, including the intersection redesign at N Hamilton Street and E Sharp Avenue, have the potential to impact north-south traffic circulation and freight movement in the study area Through changes to signal phasing. Changes to pedestrian crossing distances may alter signal timing for vehicles.
- Construction of a grade-separated crossing for the Centennial Trail at Mission Avenue would improve safety and access for users of the Centennial Trail and people accessing the City Line, Mission Park, the Avista Headquarters, and Upriver Park. The planned underpass for the Centennial Trail at Mission Avenue would improve safety and connectivity for people walking, bicycling, or rolling to the trail.
- Construction for all Action Alternatives may result in temporary impacts to existing facilities, including road closures, lane closures, detours, closure of sidewalks, closure of bicycle facilities, and property access modifications to maintain traffic flow.

3.10.2.1 Preferred Alternative

3.10.2.2 People Who Walk, Bike, or Roll

Traffic calming measures crossing N Hamilton Street will support increased east-west bicycle and pedestrian users to local destinations and transit. Additionally, expanded pedestrian facilities at the E Sharp Avenue and N Hamilton Street intersection would reduce the crossing distance of N Hamilton Street for active transportation users. Additional housing units through urban land uses changes in the Preferred Alternative provide the opportunity for short trips that are convenient for walking, biking, or transit. Demographic data shows that a significantly large percentage of people in the study area walk to work at 33 percent, compared to the citywide average of 4 percent. Given that a significant portion of the population already commutes on foot, the implementation of a transit-oriented development would likely increase walking, biking, and rolling in South Logan.

Improvement of a shared-use pathway through Mission Park along the Sharp Avenue alignment, including a new bridge for walking and bicycling across the Spokane River to Riverton Avenue, would improve connectivity for the walking and bicycling network. Improvements identified in a future study of a Sharp Avenue pedestrian bridge over the Spokane River would improve access for people who walk, bike, and roll.



3.10.2.3 Public Transportation

Transit-oriented development and land use changes with higher intensities are expected to boost trip generation in South Logan, which will further support the City Line BRT. Enhanced pedestrian crossings of N Hamilton Street will improve access to the City Line BRT and increase the number of potential riders.

3.10.2.4 Roadway Facilities and Vehicular Travel

Traffic volumes along N Hamilton Street under the Preferred Alternative are forecasted to be 9 percent higher compared to the No Action Alternative. The Preferred Alternative is anticipated to generate approximately 928 new PM peak hour vehicle trips as a result of land use changes in South Logan. As the N Hamilton Street/E Trent Avenue intersection is along a state route, it falls under the jurisdiction of WSDOT and is subject to their LOS standard set at LOS D. A traffic analysis forecasted that the N Hamilton Street/E Trent Avenue intersection will operate at LOS E in the 2045 No Action Alternative and LOS F in the Preferred Alternative scenario.

3.10.3 Mitigation Strategies

3.10.3.1 People who Walk, Bike, or Roll

The Action Alternatives include improvements for bicycling and pedestrian infrastructure intended to provide improved mobility options, reduce conflict points with vehicles, improve safety performance, increase connectivity of the walking and bicycling network, and improving access to transit for people walking, bicycling, and rolling. None of the proposed changes are expected to have lasting negative effects on current bicycle and pedestrian facilities, thus no further measures are necessary.

3.10.3.2 Public Transportation

The Action Alternatives are anticipated to increase the use of public transit, but no impacts to transit service were identified within the area. As a result, mitigation measures for transit service and operations in the area are not necessary. Diverted traffic volumes may relocate traffic to other streets and would require traffic modeling to determine impacts.

3.10.3.3 Roadway Facilities and Vehicular Travel

The intersection of N Hamilton Street/E Trent Avenue is forecasted to operate at LOS E during the 2045 No Action and LOS F during the Preferred Action. Any development must ensure that the LOS remains at or above the WSDOT standard of LOS D, and if affected, the development should implement measures to restore the LOS to its pre-development level. Changes to signal timing would improve level of service to LOS E in the 2045 Preferred Alternative. It is recommended that as mitigation, the City of Spokane monitor the signal at the intersection of Hamilton Street, E Trent Avenue, and the I-90 ramp and make adjustment to the signal timing as needed to accommodate future development in the area.

3.11 Utilities and Infrastructure

3.11.1 Existing Conditions

The planning area is fully urbanized and fully served by municipal and private utilities. As part of Spokane's core area, the systems are designed, sized, developed, and maintained to serve urban development of intensities similar to what is existing. It should be noted that updated to the utilities infrastructure may be required depending on the type and intensity of future development(s).



3.11.1.1 Regulatory Context

There are several policies and regulations related to existing and planned utilities and infrastructure in the study area. The Federal, state, regional and local plans, policies, and regulations that affect the utilities assessment are listed below. For maps of the water infrastructure, sewer infrastructure and stormwater please refer to the Existing Conditions Report included in Appendix 1 of the DEIS.

Federal

- National Environmental Policy Act (40 CFR 1500-1508)
- Council on Environmental Quality Regulations for Implementing NEPA (40 CFR 1500-1508)
- Federal Clean Water Act (CWA) Washington State Department of Ecology and U.S. Army Corps of Engineers

State

- Water Pollution Control Act, RCW 90.48 WADOE
- Water Quality Standards for Surface Waters, WAC 173-201A WADOE
- Washington Administrative Code (WAC), State Environmental Policy Act (SEPA) WAC 197-11

Local

- Spokane Regional Stormwater Manual
- City of Spokane Municipal Code Title 13 Utilities and Services
- City of Spokane Integrated Clean Water Plan
- City of Spokane Sustainability Action Plan
- City of Spokane Water System Plan
- City of Spokane Comprehensive Plan
- Spokane County Comprehensive Plan

3.11.1.2 Water

The City of Spokane provides water to the planning area from their seven well sites. The delivery system is designed to serve a mix of institutional, residential, and warehousing uses. Its transmission lines also distribute water to land north and south of the planning area. The water system network is interconnected, with a few dead-end lines and pipe diameters ranging from 6" to 24". There is a pump station that services the area on a City-owned parcel at the northeast corner of Columbus Street and Springfield Avenue. Water service to the Gonzaga campus is through the school's private system.

The Level of Service (LOS) standard is for the source of supply capacity to be equal to or greater than the maximum day demand (MDD). Currently, the total system pumping capacity is 282 MGD. The highest recorded MDD is 185 MGD. The Countywide Planning Policies have also established a minimum LOS for distribution of water. "The flow rate must be provided at no less than 30 psi (pounds per square inch) at all points in the distribution system (measured at any customer's water meter or at the property line if no meter exists) except for fire flow conditions" (2023-2028 Citywide Capital Improvement Program, December 2022). However, the City of Spokane Water Department requires that the water system provide a minimum pressure of 45 psi.



3.11.1.3 Sanitary sewer

The City of Spokane provides sanitary sewer service to all of the planning area. The Wastewater Treatment Facility receives and treats sewage from within the City, as well as portions of Spokane County and Fairchild Air Force Base (FAFB). The system generally flows by gravity to a lift station and then conveyed through force mains to the treatment plant.

The LOS for sanitary sewage is 100 gallons per capita per day (GPCD). The city Wastewater Treatment Plant has the capacity to treat 50 million gallons per day during dry weather.

As many of the City's sewer lines are aging (75-100 years old), the cure in place pipe program (CIPP) is being implemented to inspect and repair damaged infrastructure. The method places a resin-treated polyester felt liner inside the old pipes to restore damage without having to excavate. City-wide improvements are funded through the current Capital Improvement Program over the next six years (2023-2028 Citywide Capital Improvement Program, December 2022).

3.11.1.4 Stormwater

The City of Spokane provides and maintains the planning area's storm drain system which collects runoff from the public right-of-way, the outfall ultimately flowing into the Spokane River. Surface water on Spokane Falls Blvd goes through a system of grassy swales prior to flowing into the river. All other outfalls are direct to the river, and the City intends to enhance its stormwater conveyance and treatment. Most often, stormwater infrastructure improvements are implemented as part of other work, such as roadway and sidewalk projects. Development of private property is required to capture and contain all runoff from the site by designing on-site stormwater facilities.

Stormwater in the City of Spokane is regulated by the Eastern Washington Phase II Municipal Stormwater -National Pollutant Discharge Elimination System (NPDES) Permit issued by the Washington State Department of Ecology (Ecology). Current stormwater regulations require new development and redevelopment to mitigate new impervious surfaces and pollution generating surfaces with flow control and/or water quality treatment.

3.11.1.5 Power

Avista provides power service to the planning area and is a significant partner in the University District as both property owner and utility. Avista's power infrastructure in the planning area is robust; designed and developed to serve industrial, residential, and institutional customers.

3.11.1.6 Natural Gas

Avista provides natural gas to the planning area. The gas pipelines, like the electricity network, are designed and sized to serve a variety of industrial, residential, and institutional customers, with abundant capacity to accommodate future development.

3.11.1.7 Communications

Communication services include internet, phone, and television services. Within the planning area, those services are provided by private franchises like CenturyLink, Xfinity, TDS, DirectTV, HughesNet, and others through subscription service.



3.11.2 Potential Impacts

To provide a framework for the environmental analysis, the growth assumptions shown in Section 2.4.1 were used for the Preferred Alternative. The Preferred Alternative was evaluated for effects on the utility services and infrastructure in the South Logan study area as compared to those evaluated for the Action Alternatives in the DEIS. Potential impacts were assessed based on the likely need to upgrade utility infrastructure or add capacity due to buildout under each of the alternatives.

Stormwater

All development is required to accommodate stormwater and ensure the drainage systems are adequate for the proposed development. However, small scale development in areas with existing informal drainage could have an impact on localized stormwater drainage. All projects must comply with the minimum requirements in the citywide Standards for Stormwater Facilities (SMC 17D.060), which would mitigate any potential impacts from the proposed development.

Power and Natural Gas

The current power and gas utility provider, Avista, has indicated that the existing system is adequate to serve the anticipated growth. New developments and redevelopments are required to provide Avista with accurate load information prior to installation of equipment or infrastructure, to determine the availability of service and adequate supply. The development and redevelopment potential of the South Logan area is not anticipated to create any impacts on the power or natural gas supplies in the region.

Communications

Communications services are provided by private franchises on an individual contract (on-demand) basis. As such, the service providers are responsible for all infrastructure upgrades to their system.

3.11.2.1 Preferred Alternative

The Preferred Alternative includes increases to building heights and intensity, especially in the residential areas in the northern part of the neighborhood and areas surrounding Hamilton Street. Buildout under this alternative would result in 2,954 residential units with a population increase of 6,735 in the South Logan study area. It would also include the second highest amount of commercial space as compared to the other Action Alternatives.

The potential redevelopment under the Preferred Alternative would result in increased demand for water and sanitary sewer by 673,500 gallons per day, based on additional residents. This is slightly higher than the range of projected demand under the Action Alternatives in the DEIS. The current water supply and sanitary sewer treatment facilities have the capacity to supply service under this scenario; however, local infrastructure supplying individual lots or blocks may need to be upgraded. In addition to city-wide improvements made during the planning period, all development would be required to provide water and sanitary sewer connections from the redevelopment to the city main lines.

3.11.3 Mitigation Strategies

The anticipated impacts to utilities and infrastructure from implementation of the Preferred Alternative are expected to fall within the same range as the Action Alternatives analyzed in the DEIS. As such, the mitigation proposed in the DEIS also applies to the Preferred Alternative.



Future development would likely result in greater demands on localized areas of the water supply and sanitary sewer system. However, the City of Spokane has methods in place that ensure development is not endorsed without identification of demand and availability of utilities, including meeting fire code requirements for new developments and redevelopments. Some development would be required to improve stormwater and drainage systems. New development would be periodically evaluated in combination with other growth within the Spokane service area over the planning horizon to determine if system-wide upgrades are required.

The City could use tools to ensure that systematic stormwater drainage improvements are made at the time of small-scale infill developments in areas of informal drainage. One potential tool is to establish a latecomer agreement mechanism for sidewalk / drainage improvements. This tool would allow homeowners and builders of small-scale development projects to sign an agreement to contribute to future block-scale sidewalk / drainage improvements at the time the City is prepared to construct a block-scale improvement in the area. The tool could be combined with low-cost loan financing assistance from the city.

The Preferred Alternative would, over time, result in required changes to the existing utility infrastructure and services. The development changes in the subarea are expected to gradually occur and are not anticipated to result in significant unavoidable adverse impacts that cannot be mitigated through measures discussed above.



4 Comments Received on the DEIS

4.1 Comments Received

Chapter 4 of this FEIS contains public comments provided on the DEIS during the comment period and provides responses to those comments. The Draft EIS was published on May 8, 2023 with a 30-day public comment period. Outreach was conducted through several channels to inform the public and stakeholders of the project and opportunities to engage. During the public comment period, the project team hosted a public workshop on May 18, 2023 at Gonzaga University. Planning staff and project consultants shared information about the project and community members were able to provide real time feedback on the draft Subarea Plan and draft alternatives to shape the South Logan area. Comments gathered include all public comments received through emails, hard copy written letters, and verbal comments during the May 18th public workshop.

Individual comments that were received in written form via e-mail or hard copy written letter are organized in alphabetical order. Where a commenter submitted comments on behalf of an organization or group, that is indicated in the table. Unique comments are numbered and responses are provided.

Comments that state an opinion or preference are acknowledged with a response that indicates the comment is noted. Comments that ask questions, request clarification or corrections, or are related to the DEIS analysis are provided a response that explains the approach, offers corrections, or provides other appropriate replies.

In total, the City received 16 written comments during the public comment period, shown in Table 9.



Table 9 DEIS Commenters

ID	Affiliation	Name	Date
Agency			
1	WSDOT	Figg, Greg	6/8/2023
2	Spokane Transit Authority	Jennings, Brian	6/7/2023
3	City of Spokane Historic Pres Office	Camporeale, Logan	6/8/2023
4	Spokane Parks & Recreation	Hamad, Nick	6/13/2023
5	City of Spokane Street Departments	Halbig, Bobby	6/7/2023
Institutional a	and Organizational		
6	Gonzaga University	Murphy, Chuck	5/19/2023
7	Gonzaga University	Sammons, Ken	6/8/2023
8	Spokane University District	Sinisterra, Juliet	6/9/2023
Individual			
9		Bond, James	5/30/2023
10		Bruya, Edward	6/8/2023
11		Byrd, Karen	6/8/2023
12		Flaherty, John	6/8/2023
13		Kelly, Christopher	6/8/2023
14		Mannino, Dave	6/1/2023
15		Tompkins, Doug	6/5/2023
16		Waldref, Amber	6/9/2023

4.2 Response to Comments

During the DEIS comment period, written comments were received from agencies, organizations, and individuals. City staff consider all timely and substantive comments received during the public comment period, including the following considerations:

- Explain how the alternatives, including the proposed action, were modified;
- Explain how the analysis was supplemented, improved, or modified;
- Make factual corrections; or
- Explain why the comment does not warrant further response.

Comments that state preferences on alternatives or other matters are acknowledged with a response that the comment is noted and forwarded to City decision makers. Comments that address methods, analysis results, mitigation, or other matters under the purview of the SEPA document are provided with a response.



Table 10 DEIS Comment Responses

ID	Affiliation	Summary	Response
Ager	ncy		
1	WSDOT	Transportation element needs to be refined to identify the transportation impacts associated with the planned action component of the plan. A quantitative element should be included to identify the traffic volume increased associated with this action at the Trent and Hamilton intersection and the Hamilton and I-90 Interchange. Once traffic volumes are identified and analysis, multimodal mitigating measures may be necessary.	The FEIS includes additional information regarding the forecasted level of service (LOS) at the intersection of N Hamilton Street and E Trent Avenue. Impacts from the Preferred Alternative and mitigation strategies are included.
2	Spokane Transit Authority	Transportation should be addressed earlier in the document. For all the alternatives there needs to be a re-framing of the impacts, especially how the Roadway Facilities and Vehicular Travel is characterized. More emphasis on benefits of public transit, walking and biking, and prioritization of transportation and transit-oriented development in the analysis. Seems that modes that we want to prioritize (walk, bike, roll and transit) should come before discussions of vehicles and the roadway network. Starting every discussion with roadway or vehicles gives those modes a primacy that is not intended. Impacts to vehicular movement should never be considered significantly adverse when doing TOD planning, or we'll never get anywhere. STA recommends a cap on how much parking can be included in developments within 1/4 mile of BRT Stations. More context about neighborhood history. More context on economics of university students in the area, and impact of students on the area. Difference between low-income households and students who are temporarily low- income due to student status. Not clear how vehicle impacts are being defined. Pedestrian improvements enhance mobility and access for pedestrians and increase access to transit. Potential impacts on vehicular movements along arterials in the study area may require additional evaluation and mitigation. More context about the full City Line route.	 EIS topics follow a standard order to ease navigation and are not ordered in terms of importance. It is recommended to keep the same order in the Final EIS for consistency with the Draft EIS. FEIS text has been revised in the Transportation chapter to highlight benefits of public transit and TOD first. Subheadings were re-ordered to list nonmotorized impacts before vehicular. The City's Building Opportunity for Housing project includes consideration of parking standards, including state requirements under HB 1110 adopted by the Washington Legislature in 2023. The Preferred Alternative recommends removing parking minimums within 1/4 mile of stations for all uses including residential, while also monitoring market conditions for further reductions. The Subarea Plan and FEIS include additional history on the neighborhood related to 1-90 development in the Neighborhood Context and Historic and Cultural Preservation chapters. The FEIS includes a note about the economics of university students as lower income that is consistent with college neighborhoods. The Social Vulnerability Index is a standard for vulnerability metrics provided by CDC, and used to identify areas that are vulnerable and at risk for displacement. It looks at Census tracts and key metrics. In discussing affordable housing options, recommendations consider housing options that should be available for all phases of life and are part of the strategy to expand housing options in South Logan.



	Spokane Transit Authority (continued)	Regional traffic models show that traffic volumes and vehicle delay increase slightly by 2047, but the overall impacts are unknown, and will be mitigated by improved transit access and transportation options. Traffic modeling was performed for DivisionConnects, and it did look at Hamilton St as well. The NSC will pull some of the through regional traffic off Hamilton St, which is beneficial. It should be clear that the improvements in the Alternative 1 are the baseline for all other improvements. Suggested language edits for analysis.	Discussion on potential impacts on vehicular movements has been revised in the FEIS. Mention of the full City Line route is now included. The text has been revised to reference DivisionConnects conclusions. The FEIS focuses on the Preferred Alternative, which includes the listed items in Alternative 1. Suggested text edits were considered and incorporated throughout. Other comments acknowledged.
3	City of Spokane Historic Pres Office	Recognition of historic buildings and spaces important for preservation. Revision of historic resources section with updated information. Recommendations for updating subarea goals to align with Office of Historic Preservation. Expand discussion on displacement and "naturally occurring affordable housing" (NOAH). Include discussion of a Preservation Development Authority to help reduce displacement, per RCW43.167. Support Alternative 3, because it seems to be most respectful of historic resources in focusing the most intense new development toward the south end of the area. If some hybrid of the alternatives were to be selected, our office would advocate for a specific zoning classification to be applied to the areas that have previously been recognized as historically significant or that are proximate to previously recognized historic resources.	 The Final Subarea Plan includes reference to current incentives offered by the Spokane Historic Preservation Office and refinements of policies for partnerships based on suggestions. The FEIS includes text edits as well as updated context in the Historic and Cultural Preservation chapter. The Preferred Alternative includes a strategy for prioritizing updates to residential design standards. The City is pursuing adding new code and design standards for more housing types, like middle housing. The City would need to study in more detail RCW43.167 and possible funding mechanisms. This is outside the scope of this project and the SEPA analysis. A specific zoning classification is outside the scope of the project.



Parks Division is supportive of increased housing capacity near Mission Park, enhanced connectivity, accessibility, and mobility within South Logan and the adjacent river corridor, improved east-west bicycle and walking connections between the study area and the Chief Garry neighborhood, and transforming the Southeast Riverfront Area, maximizing riverfront connections, open space improvements, and access within the study area. Concerned that if not properly planned or mitigated, increased development may increase park usage such that facilities deteriorate park assets more quickly than the parks division is capable of replacing said improvements. Include a recommendation for establishment of specific mitigating factors to generate appropriate park and trail maintenance funding. Recommend establishing 'park impact fees' within the study boundary, or establishment of a development district maintenance fee (B.I.D., etc.) to provide a mechanism for maintaining and upgrading park infrastructure and assets. Support the exploration and establishment of public/private partnerships to enhance study area recreational opportunities and recommend specific language be added to address the need for these partnerships not only to fund implementation of improvements to park space and the Centennial Trail Corridor, but to fund ongoing maintenance of these improved spaces and facilities. Recommend removing 'Collaboration with St. Aloysius Catholic School regarding the accessibility of their playfield for public use during non-school/event hours,' as considered private property and changes to Washington State insurance law no longer permits such a partnership.

The City of Spokane has not adopted park impact fees at a city level. This strategy needs more study on park impact fees and applications for future development citywide.

Implementation in South Logan is outside the scope of the project. Expand public-private discussion to include open space/parks implementation/maintenance partnerships.

Reflected change related to St. Aloysious Catholic School as private property.

Other comments acknowledged.

4 Spokane Parks & Recreation



Concerns over utility and infrastructure needs for development. Impacts to Hamilton I-90 off-ramp with upgrades to Springfield Ave. Completion of North Spokane Corridor before changes to Hamilton St. Concerns over displacement and rising rents due to university students. Street Department does not support the conversion of "an eastbound general-purpose lane on mission to a two-way protected bike lane". A river crossing will need to be constructed to facilitate. Adequate parking will need to be provided for university students. Natural gas may not be a viable option for heating and cooking in the near future.

City of Spokane Street Departments

5

Utility impacts are addressed in the draft and final environmental impact statements. Stormwater standards are applied citywide, and properties must treat stormwater on site. Based on updated adopted standards, new development will improve stormwater discharge based on current standards.

The City of Spokane Integrated Capital Management and WA Department of Transportation have indicated that with study this proposal is feasible. The plan identified that an alternate route for accessibility of Centennial Trail Overpass is important for connectivity. Mitigation strategies could include timing of signals to reduce congestion. Further transportation analysis has indicated that there is a projected decrease of traffic overall with the North Spokane Corridor.

The Preferred Alternative proposes continuing to study short- and longterm traffic calming solutions as North Spokane Corridor is completed. None of the listed concerns are proposed to occur without further study, which is referenced in the Preferred Alternative.

The Preferred Alternative and final plan include more focused strategies for affordable and anti-displacement and including goals and policies to limit residential displacement. It is outside the scope of the project to direct student housing and predict individual motivations of university students to live in certain places. Market factors are hard to predict, as property owners ultimately drive development, though many property owners in South Logan cater to students specifically.

Gonzaga University provides bus passes for all students, faculty, and staff and actively promotes alternative modes of transportation. The City Line offers expanded transportation options over time as more people ride it and become familiar with the service.

Other comments acknowledged.



Instit	Institutional and Organizational					
6	Gonzaga University	Support improvements at Sharp and Hamilton, and Springfield and Hamilton. Consider HAWK light first at Springfield and Hamilton. Zoning - keep the existing residential zoning for the blocks west of Mission Park and north of Sharp; support the increased density between Cincinnati and Hamilton and south of Boone. Alternative 2 and 4 – minimal zoning change. Alternative 3 – support riverfront connections, open space improvements, and completing trail connections. Potential for a pocket park at the southeast intersection of Hamilton and Trent; support the opportunity for shared parking; support reduced parking requirement but not elimination. Alternative 4 – support increased density; support the campus zoning of Residential 70', as well as to the north to Sinto. Support the redesign of Hamilton and Sharp intersections, though unsure about the best design. Support main street improvements on Columbus. Supports river crossing improvements, but not continued study of Sharp Ave crossing.	The City will examine the various benefits and drawbacks of a HAWK system versus a traffic light when studying this option further. The Preferred Alternative recommends changing the area north of Sharp area to Residential Multi-Family, while retaining similar heights as Residential 1 (previously Residential Single-Family). The City is also working to make permanent zoning changes to increase housing types in R1 zoning across the city, with expected completion in November 2023. Alternatives 2 and 4 proposed to activate the street level with mixed-use development through the Form-Based Code or Centers & Corridors zoning. The Preferred Alternative is proposing to keep the west side of Desmet Station consistent with RHD zoning on campus. In the longer term, the City will consider institutional land use plan map designation for the entire Gonzaga campus. The Preferred Alternative is recommending continued study of river crossings, but not prioritizing the Sharp Ave crossing at this time. The WA Dept. of Transportation owns the parcel at the southeast intersection of Hamilton St and Trent Ave and has direction over the parcel. The Preferred Alternative proposes to eliminate minimum parking requirements within 1/4 mile of transit stations consistent with HB 1110, but property owners still have the option to incorporate parking into a development as desired. Alternative 4 proposed the zoning change at the alley to keep frontage similar along both sides of Desmet Ave. The Preferred Alternative includes the same approach. Including reference in the final plan and FEIS of Gonzaga's projected enrollment trends. Other comments acknowledged.			
7	Gonzaga University	Preferred height limit for Gonzaga campus is 75-feet, not 70-feet, to accommodate more student housing. 75-feet is needed for a 5-story facility housing 292 beds.	Comment has been reviewed and considered during the development of the FEIS. The current code allows for RHD-70. The preferred alternative recommends code changes to RHD-75 in future code updates during implementation. The final Subarea Plan will be adopted by resolution, with land use ordinances to follow a separate process.			



8	Spokane University District	Support the overall greater intensification of mixed uses (150'), if approximately 30% of conservation/open space is preserved particularly along the Spokane River. Support creative approaches/strategies to encourage anti- displacement in the UD. Support the addition of a traffic signal at Springfield and Hamilton. Support a new ped/bike crossing bridge at Sharp over the Spokane River to better link Gonzaga University to the Chief Garry neighborhood. Support enhancing wayfinding for the non-motorized boat launch and fishing access near the SIERR building and the completion of the North Bank Trail. Support any and all green improvements, wayfinding signage, traffic diverters, crossing improvements, and green stormwater infrastructure. Support the preservation and/or improved public access to land adjacent to the Spokane River in all locations. Support a UD/City park development on City-owned land along Superior Avenue.	Comments acknowledged and considered in the final subarea plan and FEIS. As redevelopment occurs for buildings along the Spokane River, expanded public river access of some type would be required per SMC 17E.060 Shoreline Master Program. The Preferred Alternative aligns with comments.
Indiv	idual		
9	James Bond	Concerns over the success rate of increased bike lanes in encouraging alternative transportation, as well as their usability during winter conditions. Avoid constructing bike lanes like those found on Illinois Street and Crestline, which are not maintained or easily cleared during winter conditions.	Comment acknowledged.
10	Ed Bruya	Prefer Alternative 4. Alternative 4 allows the southern portion to grow to become a vibrant community center, with traffic calming measures, and allowing the river to become a major showcase that is an amenity to future high-density residential living.	Comment acknowledged.
11	Karen Byrd	Recommend Alternative 4 over the other alternatives, only if specific design requirements are developed and implemented prior to the land use and zoning changes. Design requirements must protect historic homes, require all new commercial and mixed-use development to be built up to the street, and not allow drive through facilities on the front of a business or building.	The Preferred Alternative includes recommendations for design standards to be implemented prior to or in conjunction with zoning code changes. The City is also currently conducting a separate in-depth Centers and Corridors Study to identify future changes for all Centers and Corridors zoning citywide, including restricting drive-through facilities in CC zoning.
12	John Flaherty	Support higher intensity throughout for multi-residential housing and an urban village around the transit stops.	Comment acknowledged.



		The plan does not appropriately account for the number of units that are possible under Alternative 1 - No Action with existing zoning. The plan should calculate and clearly show the potential density increase of the No Action. The 1/4-mile radius does not effectively identify specific areas are more appropriate for high intensity development and lumping all areas within the 1/4-mile radius does not look at the area context. Mixed-use development is key to walkable areas, does not support removing requirements for ground-floor commercial along Hamilton.	Projections for local population growth by 2047 were developed based on the increase in total building capacity in each alternative based on zoning changes, and the effect of investments in specific areas to encourage private development, including Alternative 1. The goal of these projections is to provide basic assumptions needed for analysis of potential impacts of new development in this EIS. Actual outcomes growth and development in South Logan will be shaped by decisions by individual residents, business owners, investors, and organizations.
		floor commercial along Hamilton. Concerns about existing infill development integrating into the neighborhood and promoting walkability. Support the action alternative physical proposals that do not involve changing the zones, including rezoning parts of the Southeast Riverfront area from General Commercial to Centers and Corridors Employment Center. Does not support removing one lane on Mission for a bike lane.	Each alternative had zoning that addresses different areas in different ways, and not all areas are looked at as the same potential for development. The quarter mile is used to acknowledge the areas with the best access to the stations. Analyzing a range of development allows for a range of access to and support of the new BRT route.
13	Christopher Kelly		The Subarea Plan acknowledges that ground floor retail is important to street level activation. Market factors influence viability of ground floor retail, and the current requirement to build ground floor retail on speculation can increase costs and limit development potential. The Preferred Alternative focuses on signalized intersections for activity and allows other uses that still interact with the street but more flexibility for residential, community spaces, common areas that can provide activation while lowering costs for mixed use development.
			The final Subarea Plan recognizes the need and recommends design standards, particularly for residential multi-family. The intent is to support development and public investments that help shift trips to human- powered modes and transit.
			Other comments acknowledged.



14	Dave Mannino	Support the priorities and investments to study options on improving river crossings for bicycles and pedestrians in the vicinity on Mission Avenue. Support studying options for improved east-west bicycle and walking connections. Recommend specifically looking at an improvement of the full pathway through Mission Park to the City Line bus stop near the railroad tracks.	The final Subarea Plan supports connectivity between stations and added additional text in plan to convey this more directly
15	Doug Tompkins	Where higher density is zoned, additional onsite parking should be required. Does not support Alternative 4 because of too much density south of Boone. Could generally support Alternative 2 or 3.	Comment acknowledged.
16	Amber Waldref	Prefer the Southeast Riverfront Alternative 3 to activate the southern portion of the study area and areas around the river. Support rezoning the General Commercial areas to Centers & Corridors, but not to CC Employment Center. Change the C area to use the higher density in Alternative 2. Design standards are critical to ensuring a good blend of new development with the historic character of the Logan neighborhood. New development must not push out affordable housing in the neighborhood. Protections must be put in place to ensure affordable housing is included, either through incentives or requirements of including affordable housing if a current resident was removed for the development.	The final Subarea Plan recognizes the need and recommends design standards, particularly for residential multi-family. The final Subarea Plan includes more discussion on affordable housing and anti-displacement and specific goals and policies to support outcomes. Other comments acknowledged.

