



STAFF REPORT

DEPARTMENT OF NEIGHBORHOOD AND PLANNING SERVICES

To:	Spokane Plan Commission
Subject:	<ul style="list-style-type: none">• South University District Subarea Plan• Amendments to Comprehensive Plan Land Use Plan Map, Zoning Map, and Overlay Zones
Staff Contact:	Christopher Green, AICP, Assistant Planner (509) 625-6194 cgreen@spokanecity.org
Report Date:	DRAFT February 28, 2020
Hearing Date:	March 25, 2020
Recommendation:	Approve

I. SUMMARY

Department of Neighborhood and Planning Services staff, working with consultant MAKERS Architecture & Urban Design and district stakeholders (collectively the “Project Team”), have developed a draft *South University District Subarea Plan* to guide future development in a 214-acre area just east of the Downtown core. Based on the framework provided by the subarea plan’s goals and policies, a proposed Comprehensive Plan Amendment and corresponding map changes would focus higher-density commercial development and more detailed design requirements along the Sprague Avenue and Sherman Street corridors.

II. RECOMMENDED ACTION

Staff recommends that the Plan Commission adopt the facts and findings of the staff report and recommend that City Council approve the following proposed actions:

- (1) Approve a resolution recognizing the *South University District Subarea Plan* as a declaration of the subarea’s desired future condition, and reflecting stakeholder priorities for subarea-specific implementation of land use and economic development goals adopted in the Comprehensive Plan.
- (2) Approve an ordinance adopting the following actions:

- A Comprehensive Plan Amendment to amend the Land Use Plan Map designation of a 90-acre area from General Commercial Land Use Plan Map designation to Downtown Land Use Plan Map designation, as shown in Exhibit A.
- A concurrent Zoning Map change for the same area from GC-150 (General Commercial with 150-foot height limit) to DTU (Downtown University) is also proposed, as shown in Exhibit B.
- Amendment of downtown plan Map 5.1 “Streetscape Improvements,” to designate Complete Streets within the area of the zone change, as shown in Exhibit C.
- Amendment of the Surface Parking Limited Area map (SMC 17C.124-M1) to extend the Surface Parking Limited Area to include the area of the zone change, as shown in Exhibit D.
- Amendment of the Downtown Design Review Threshold Map (SMC 17G.040-M1) to include the areas zoned DTU within the Perimeter Area identified on the Downtown Design Review Threshold Map, as shown in Exhibit E.

III. BACKGROUND

EXISTING CONDITIONS

SUBAREA BOUNDARIES

The subarea planning process for the South University District considers a 214-acre area just east of the Downtown core, bounded by Division Street to the west, Hamilton Street and its interchange with I-90 to the east, I-90 to the south, and the right-of-way for the Burlington Northern Santa Fe (BNSF) railway to the north.

CONNECTIVITY

The University District Gateway Bridge, constructed in 2018, provides a direct bicycle and pedestrian crossing over the BNSF tracks to the Riverpoint campus of Washington State University-Spokane and other higher education institutions immediately to the north of the tracks. The subarea is also directly adjacent to the Downtown core (across Division Street), the Sprague Union District (just to the east of the Hamilton interchange ramps), and the South Perry district and concentration of health care providers on the lower South Hill via the Sherman Street and Arthur Street overpasses.

The two most prominent motor vehicle transportation facilities in the region intersect at the southwest corner of the subarea; the I-90 freeway running east-west, and the Division/Browne Street couplet (U.S. Highway 395/Thomas S. Foley Memorial Highway). The 2nd/3rd Avenue couplet provide an additional point of direct access to the I-90 freeway. Several Spokane Transit Authority (STA) routes provide service within and adjacent to the district, including the Route 90 High Performance Transit line on Sprague Avenue and the Route 12 Southside/Medical Shuttle between the south landing of the University District Gateway Bridge to lower South Hill health care providers. In 2022,

the STA City Line will provide Bus Rapid Transit service at the north bridge landing, just outside of the district boundary.

ENVIRONMENTAL CONDITIONS

The subarea generally slopes downward from north to south, ranging from approximately 2000 feet above sea level near the Sherman Street crossing of I-90 to 1918 feet above sea level where Sprague Avenue intersects with Division Street and where it passes under the Hamilton Street overpass. A long bluff runs along the entire boundary of the subarea, rising about 15 feet above the BNSF railroad tracks, Martin Luther King, Jr. Way, and the WSU-Spokane campus. Exposed and subsurface basalt throughout the district present challenges for excavation, extension of utilities, and stormwater infiltration, and has likely constrained development on some sites where outcroppings are especially prominent.

Due to the history of industrial, railroad, and other business types located in and around the South University District, concerns about past contamination looms over some potential redevelopment sites. Separate from the subarea planning process, the City of Spokane is working with a coalition of district partners to assess and clean up properties in the University District through a combination of State of Washington and U.S. Environmental Protection Agency funding.

LAND USE AND DEVELOPMENT PATTERN

Most of the subarea was originally platted in the late 1800s, followed by the emergence of a commercial corridor on Sprague Avenue alongside a streetcar line (and later highway route), and single family residences developing intermittently on the narrow lots platted on the blocks to the south. The commercial buildings that developed during the early 1900s rarely included more than a few off-street parking spaces. Through the second half of the 20th Century, the subarea was zoned light industrial, and small scale industrial uses filled in many of the gaps between the residences.

Overall, these distinct phases of historical development have led to a wide range of building types and land uses within the subarea. Reflecting the long time roles of the subarea as both a light industrial enclave and a regional center for durable goods retail and wholesale trade, most of the South University District was zoned GC-150 (General Commercial with a 150 foot height limit) when a full revision of the zoning and development code was completed in 2006.

SMC 17C.120.030 characterizes the General Commercial zone as:

“A full range of retail and service businesses with a local or regional market as well as industrial uses are allowed. Industrial uses are limited in size to avoid adverse effects different in kind or amount than commercial uses and to ensure that they do not dominate the character of the commercial area.”

There are approximately 1,589 acres of land zoned either GC-70 or GC-150 within the City of Spokane. Outside of the South University District, most of this acreage is concentrated along N Division Street, N Newport Highway, E Francis Avenue, and near the Spokane International Airport.

RECENT PLANNING EFFORTS

At the same time, existing conditions present a number of potential barriers to further development and complementary employment growth in the South University District. Recent studies of

Page 3 of 25

development capacity in the district have suggested that the flexibility of allowed uses and design outcomes permitted under the existing GC-150 zoning is sometimes counteracted by the constraints imposed by a low maximum Floor Area Ratio (FAR) for non-residential uses and relatively high off-street parking requirements.² Unlike other development barriers, such as issues around market and topographic conditions, these concerns can be addressed within the scope of the subarea planning process.

Since a team of University District stakeholders completed the *University District Strategic Master Plan* in 2004, a series of public and privately-commissioned plans have envisioned the future of the South University District subarea, with most identifying a “T” shape focused on the intersection of Sprague Avenue and Sherman Street as a key node for future mixed-use development. Most recently, the University District PDA adopted an update to the Strategic Master Plan for the district in 2019. Each of these previous plans have built a better understanding of existing conditions and stakeholder visions for the future of the subarea, but have not been implemented through changes to zoning or development standards. The current process used the Sherman and Sprague “T” concept as a starting point, with an end goal of implementing whatever land use and zoning changes (if any) are necessary to implement the community’s vision for future development of the subarea.

IV. PROCESS

COMPREHENSIVE PLAN AMENDMENT PROCEDURE

The Washington Growth Management Act (RCW 36.70A) provides that proposed amendments to a comprehensive plan may be considered by the governing body of a city no more frequently than once per year, but further provides that, so long as a subarea plan clarifies, supplements, or implements city-wide comprehensive plan policies, and so long as the cumulative impacts of the proposed subarea plan are addressed by appropriate environmental review under RCW 43.21C, the initial adoption of a subarea plan may occur outside of this annual process.

As described in further detail in Section V of this report, the proposed amendments implement policies adopted under citywide Comprehensive Plan Land Use Goals LU 2 and LU 3 and Economic Development Goals ED 2 and ED 3. Environmental review under the Washington State Environmental Policy Act (SEPA) addressed the cumulative impacts of the proposed amendments. A Determination of Non-Significance was issued on February 21, 2020.

ROLE OF THE PLAN COMMISSION

The proposed amendment to the Comprehensive Plan Land Use Plan Map and zoning and overlay maps require a review process set forth in Spokane Municipal Code (SMC) Chapter 17G.020. The Plan Commission is responsible for holding a public hearing and forwarding a recommendations to the City Council.

² *University District Strategic Master Plan Update*, 2019, pg. 86.

The Plan Commission may incorporate the facts and findings of the staff report as the basis for its recommendation to the City Council, or may modify the findings as necessary to support their final recommendations.

ROLE OF CITY COUNCIL

The City Council will also conduct a review process, considering public comments and testimony, the staff report, and the Plan Commission's recommendation. The final decision to approve, modify or deny the proposed amendments rests with the City Council.

COMMUNITY ENGAGEMENT

Each stage of the subarea planning process has incorporated engagement with the numerous stakeholders within the district and the broader community. City of Spokane staff, with the assistance of MAKERS, have conducted the following community engagement activities to help craft this plan:

- More than 1,000 mailers sent to property owners, residents, and occupants in and around the subarea
- An email list of nearly 200 contacts to share project updates and other announcements
- A project page on the City website with up-to-date information about events and project progress
- Community Design Workshop and Stakeholder Focus Groups (July 30-31, 2019)
- Open House on Draft Vision Statement, Goals, and Policies (October 2, 2019)
- An online survey conducted from July 27-August 12, 2019, with 308 responses
- Video on City Cable 5 (also available on City website)
- Table at University District Gateway Bridge grand opening celebration (May 7, 2019)
- In-person presentations to East Spokane Business Association, East Central Neighborhood Council, the Spokane Community Assembly, the Community Assembly Land Use Committee, Downtown Spokane Partnership, University District Development Association/University District Public Development Authority Board

A more detailed Results of the Community Design Workshop and Stakeholder Focus Groups are described in further detail in the *South University District Subarea Plan* (see pages 11-14).

In addition, the project team has provided updates on the plan at key points in the process to elected and appointed officials, and to staff from City departments and interested agencies.

- Staff and Agency Technical Team Workshops (July 31, 2019 and November 14, 2019)
- Plan Commission Workshops (October 23, 2019; November 13, 2019; March 11, 2020)
- Design Review Board Workshop (November 13, 2019)
- City Council Study Session (October 31, 2019)

PUBLIC NOTIFICATION AND SEPA REVIEW

- A Notice of Intent to Adopt was filed with Washington Department of Commerce on February 28, 2020.
- Notice of Application, Notice of SEPA Determination, and Notice of Plan Commission Hearing were mailed to all affected property owners, taxpayers, and occupants in addition to those within 400 feet of the boundary of proposed map changes on February 21, 2020.
- A SEPA Determination of Non Significance (DNS) was issued on February 21, 2020. The comment period ends on March 24, 2020.
- Notice of SEPA Determination and Plan Commission Hearing was published in the *Spokesman-Review* on March XX and XX, 2020.
- A Plan Commission Hearing is scheduled for March 25, 2020.

COMMENTS RECEIVED

[This section will include a summary of comments received prior to Plan Commission hearing]

COORDINATION WITH DOWNTOWN PLAN UPDATE AND OTHER SUBAREA PLANS

The *South University District Subarea Plan* has been developed in close coordination with ongoing subarea planning efforts in the North Bank and Downtown. Appendix B of the draft *Subarea Plan* lists potential policy, map, or code issues which were identified during the planning process that have implications across the entire Downtown area. These issues exceed the scope of the South University District subarea planning process but may be worth considering in future updates of the Downtown Spokane Plan.

V. ANALYSIS

SUMMARY OF PROPOSAL

The subarea plan proposes a targeted zone change from GC-150 to DTU in a 63-acre area the vicinity of the south landing of the University District Gateway Bridge, along Sprague Avenue, and along the portion of Sherman Street closest to the intersection with Sprague Avenue. A change to the DTU zone would increase the maximum floor area ratio (FAR) for non-residential development permitted in these areas from 2.5 to 6, allowing higher intensity office and institutional uses in close proximity to the WSU-Spokane Health Sciences campus, where near-term demand for this development type is anticipated to be the highest. Like the existing GC-150 zone, the DTU zone supports development of housing and mixed-use developments that include housing by allowing unlimited FAR for residential uses.

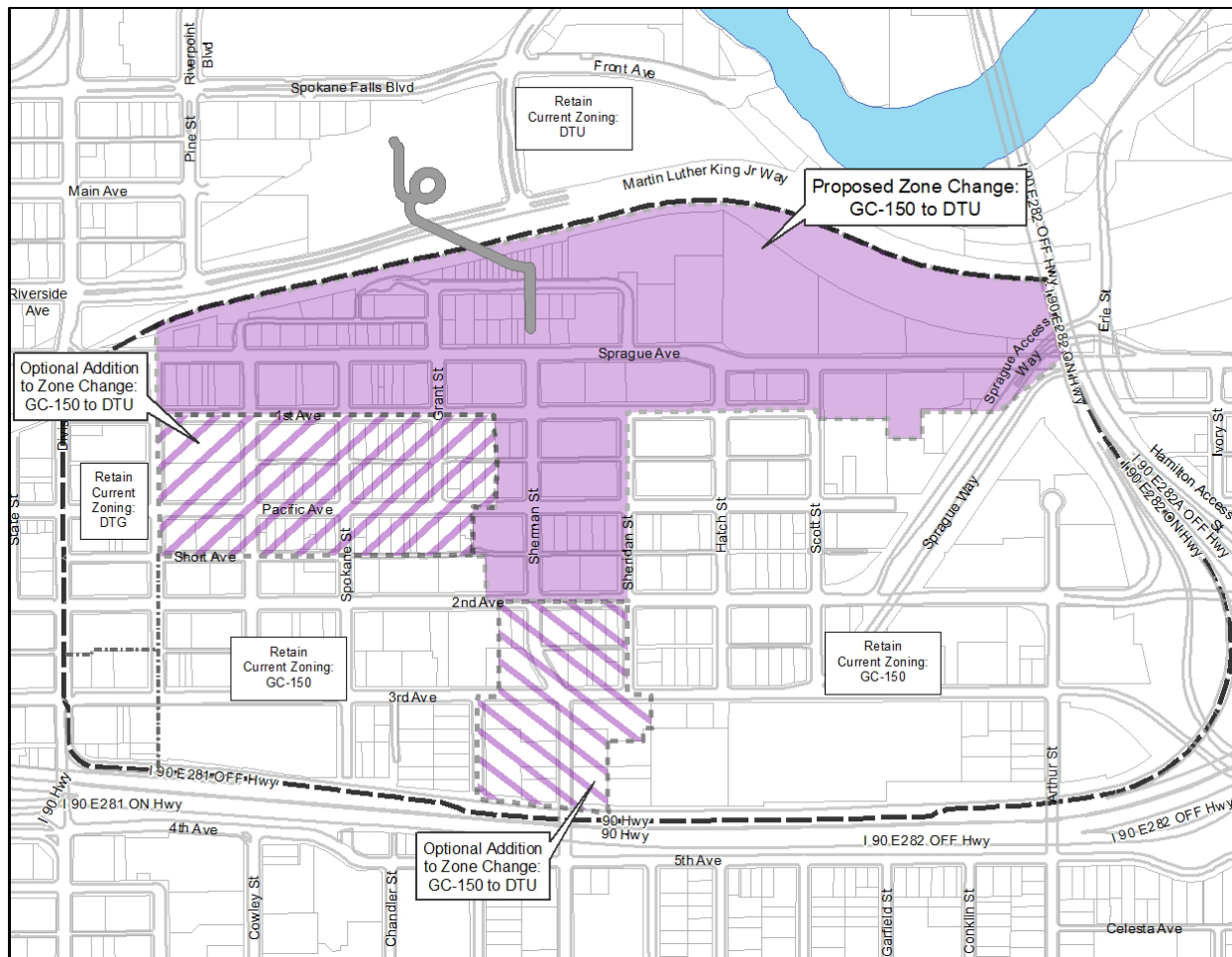


Figure 2 – Proposed area of zone change from GC-150 to DTU, with two optional additions to the DTU-zoned area shown in cross-hatch.

At the same time, the DTU zone includes more detailed standards for building orientation, the public realm, and design review for large projects. The proposed map changes focus these standards on the portion of the district along the key pedestrian-oriented streets (and focal intersection at Sprague and Sherman) identified by stakeholders in the planning process, and in alignment with recent investments in multimodal infrastructure, such as the University District Gateway Bridge, Sherman Plaza, and Sprague Phase 2 streetscape improvements.

The proposal leaves the remainder of the subarea in the existing GC-150 zone, which allows for these portions of the South University District to continue to serve the important functions of providing a space for wholesale and large durable goods retail, complementary services, and affordable light industrial/makerspace adjacent to the Downtown core. Because the GC-150 zone limits FAR for most uses to 2.5, but allows unlimited FAR for residential uses, the proposed zoning configuration also encourages development of housing throughout the subarea.

POLICY OPTIONS CONSIDERED

CHOICE OF ZONING DESIGNATION FOR THE SPRAGUE/SHERMAN “T”

During the planning process the project team considered whether a change to the base zoning or the implementation of special overlay for all or part of the subarea was necessary to implement the stakeholder vision for the South University District. Compared to the additional regulatory complexity of creating and administering a new overlay district, the Downtown General (DTG) and Downtown University (DTU) zones provide a more direct path to implementing more pedestrian-friendly standards for building orientation and streetscape design, while at the same time alleviating the development barriers posed by the FAR and off-street parking standards of the GC-150 zone.

There is almost no difference in the development standards that apply in the DTG and DTU zones. The draft subarea plan **recommends extending the DTU zone** rather than the DTG zone in the South University District because:

- The portion of the subarea proposed for the Downtown zoning extension is contiguous with the existing DTU zoning on the WSU-Spokane Health Sciences campus and private properties immediately to the north.
- The vision statement for the subarea developed by stakeholders more closely resembles the characteristics of the DTU zone, as described in SMC Section 17C.124.030.C: *“The downtown university zone encourages a wide range of uses that support the ongoing development of an urban inner city university. A pedestrian friendly and safe urban environment is encouraged along with a wide range of residential, office, retail, and other supporting commercial uses.”*
- While the standards contained in the DTU and DTG zone are nearly identical at this time, the DTU zone is limited to the WSU-Spokane Health Sciences campus and immediately adjacent areas. Therefore, if a future need arose for standards specific to the University District or campus-adjacent areas, modifications could be made to the DTU zone only, without impacting the many other parts of Downtown currently zoned DTG.

OPTIONAL EXTENSIONS OF DTU ZONING

The boundary of the 63-acre area proposed for extension of the DTU zone was selected to provide consistent DTU zoning on both sides of Sprague Avenue and Sherman Street, and the entire extent of the south landing area north of Sprague Avenue. Where practical, the boundary follows mid-block parcel boundaries.³ The advantages and disadvantages of two potential further extensions of the DTU zone are discussed below.

³ Street centerline boundaries are proposed along Sheridan Street, to avoid splitting developments spanning the entire block; and on 1st Avenue, where the shallow depth of the block to the north (approximately 166 feet) causes this street to function primarily as service access at the rear of building fronting on Sprague Avenue.

OPTIONAL DTU EXTENSION #1 – SOUTH SHERMAN STREET SOUTH TO I-90

Optional DTU Extension #1 would continue DTU zoning along both sides of Sherman Street beyond 2nd Avenue to I-90, with the objective of continuing a pedestrian-oriented, storefront development pattern along Sherman Street to the edge of the subarea, potentially strengthening connections to neighborhoods across I-90 to the south. This extension was not included in the original proposal due to the effects of high traffic volumes and more auto-oriented development patterns on the couplet formed by 2nd and 3rd Avenues.⁴

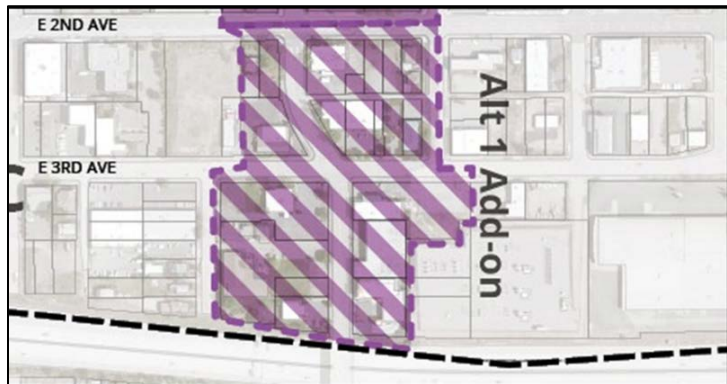


Figure 3 – Optional DTU Extension #2 would extend DTU zoning further south along S Sherman Street from E 2nd Avenue to the I-90 freeway

OPTIONAL DTU EXTENSION #2 – PACIFIC AVENUE WEST TO PINE STREET

Optional DTU Extension #2 would extend westward along the south side of 1st Avenue and both sides of Pacific Avenue. This extension would take advantage of the mix of uses, older buildings oriented to the street, and potential for pleasant bicycle and pedestrian travel within a right-of-way that is wide but carries relatively low volumes of automobile traffic. This extension was not included in the original proposal due to a higher presence of auto-oriented and light industrial uses and a less visible location for retail and other storefront businesses than along Sprague Avenue and Sherman Street. In addition, the lower non-residential FAR allowed in the GC-150 zone helps to incentivize the development of housing for redevelopment projects interested in exceeding an FAR of 2.5.



Figure 4 – Optional DTU Extension #2 would extend DTU zoning between E 1st Avenue and E Short Street, along E Pacific Avenue

EXTENSION OF OVERLAYS ASSOCIATED WITH DOWNTOWN ZONING

In addition to the base zones (e.g. DTU), several overlay zones implement supplemental standards across all or part of the areas with a Downtown zoning designation. The project team presented and

⁴ The City's 2017 Average Weekday Traffic Map shows between 10,300 and 11,500 vehicles per day on 2nd Avenue near the intersection with Sherman Street, and between 6,700 and 7,100 vehicles per day on 3rd Avenue near the intersection of with Sherman Street.

Sherman Street itself averages 10,100 vehicles per day south of 3rd Avenue, 7,100 vehicles per day between 2nd and 3rd Avenues, and 3,100 vehicles per day between 2nd and Sprague Avenues.

gathered input on different scenarios for overlay zone boundaries at the October 2019 open house and other community engagement events. The analysis and recommendations contained in the draft *Subarea Plan* consider each of these overlays individually, and whether or not they should be extended to coincide with the part of the subarea proposed to be zoned DTU.

DOWNTOWN PARKING REQUIREMENT AREA BOUNDARY (SMC 17C.230-M1)

The Downtown Parking Requirement Map provides an overlay in which no minimum number of off-street parking spaces are required for new development. New development within the Downtown Parking Requirement Area can still provide off-street parking as needed, and project financing is often contingent on certain amounts of off-street parking being included in a development, regardless of standards in the local development code. The Downtown Parking Requirement Area (overlay) currently includes all 788 acres within “Downtown” zones (DTC, DTG, DTU, and DTS), as shown in Figure 5.

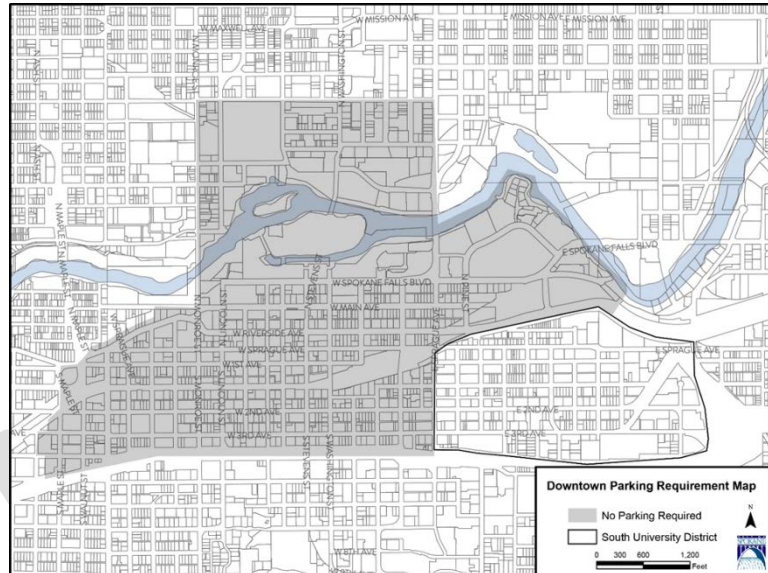


Figure 5 – Existing Boundary of Downtown Parking Requirement Area
SMC 17C.230-M1 / (No minimum parking required overlay)

In the draft *South University District Subarea Plan*, consultant **MAKERS Architecture & Urban Design** does not recommend extending this overlay into the portion of the subarea zoned DTU, and staff concurs. Previous studies of the subarea, and stakeholder feedback during the planning processes indicated that the added costs of land for surface parking lots or the construction of structured parking significantly impact the feasibility of all development types.⁵ The proposed zone change for the “T” area to DTU (Downtown University) addresses this development barrier. In the absence of the overlay, the DTU zone requires 1 space per 1,000 square feet of floor space, amounting to one-half or less the amount of parking required for most uses under the existing GC-150 zone.⁶ The reduction also provides flexibility to adaptive reuse and infill projects on the smaller lots found throughout the subarea, and takes advantage of the pedestrian, bicycle, and transit connectivity that recent investments in the district have provided.

Unlike the Downtown core or North Bank, where the no minimum parking overlay is already in place, the South University District does not have an existing supply of sharable off-street parking spaces in

⁵ Pro forma modeling of several standard development types contained in the 2019 *University District Strategic Master Plan Update* indicate that offices, labs, and other development types with high per-square-foot costs are particularly sensitive to the additional project costs imposed by construction of on-site parking.

⁶ In the GC-150 zone, general and medical office uses require 1 space per 500 square feet; most retail uses 1 space per 330 square feet; and restaurants and bars require one space per 250 square feet, as examples.

commercial garages or surface parking lots. Due to the time period in which the South University District originally developed, the existing inventory of off-street parking is very limited relative to the demand of uses already present in the subarea. Given this scarcity, business operators, employees, customers, and residents often rely on available on-street parking spaces to meet demand. Business and property owners have expressed concern throughout the planning process that increased development activity in the subarea could further strain the parking supply without corresponding development of off-street parking spaces. Under these circumstances, the reduction in minimum parking requirements afforded by the DTU base zone represents a middle ground.

SURFACE PARKING LIMITED OVERLAY (SMC 17C.124-M1)

The Surface Parking Limited Overlay prohibits new standalone commercial parking lots as a primary use. Within the overlay, surface parking lots may still be developed in support of new or existing uses, and commercial parking may still be developed within parking structures. The overlay is currently applied to a 173-acre area in the Downtown core, as shown in Figure 6.

In the draft *South University District Subarea Plan*, **MAKERS recommends extending this overlay into the portion of the subarea zoned DTU, and staff concurs.** In addition to the challenging parcel pattern and topography mentioned above, the Sprague Avenue and Sherman Street and lined in many segments by older buildings that occupy a large portion of the parcels they are located upon. The South University District is adjacent to two potential sources of “spillover” parking demand; the metered parking district in the Downtown core just across Division Street, and the WSU-Spokane Health Sciences campus to the north. In the absence of the protection provided by the Surface Parking Limited Overlay, the existing building stock at the heart of the subarea could see increased pressure for demolition in favor of surface parking lots. Due to sources of demand from outside of the subarea boundary, these additional surface parking lots may not increase the actual supply of parking for businesses located in the South University District.

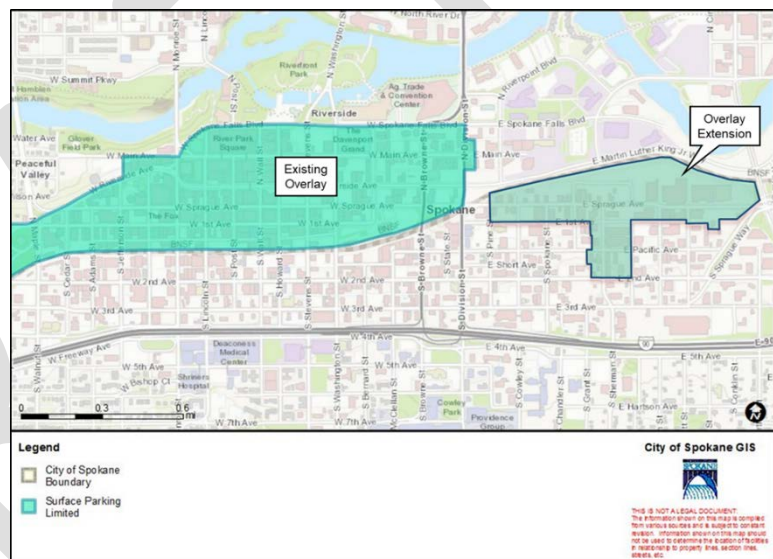


Figure 6 – Proposed extension of Surface Parking Limited Area.
SMC 17C.124-M1

DESIGNATION OF COMPLETE STREETS (DOWNTOWN PLAN MAP 5.1)

The Downtown zones (including DTU) are implemented in part by a street classification system adopted in the 2009 Fast Forward Spokane Downtown Plan update. The system uses four types of “Complete Streets,” which are used to determine what streetscape improvements, design and site

planning requirements, and types of access are allowed along street frontages.⁷ All streets within Downtown zones are classified as one of the Complete Street types described in SMC 17C.124.035; accordingly the proposal includes Complete Streets classifications for streets within the section of the subarea that would be zoned DTU.

Complete Streets designation types include the following:

- **Type I – Community Activity Street** – slow, two-way streets with wide, well-maintained sidewalks and pedestrian amenities to encourage strolling, walking, and shopping.
- **Type II – Community Connector** – move traffic and pedestrians into and around downtown. These streets provide some of the major pedestrian connection to surrounding neighborhoods and districts.
- **Type III – City-Regional Connector** – move auto traffic through downtown and provide connections to the rest of the City and region. These attractive, landscaped arterials are to be improved with street trees, sufficient sidewalks for pedestrian circulation and pedestrian buffer areas, and safe pedestrian crossings.
- **Type IV – Neighborhood Streets** – carry little through traffic and tend to have less commercial activity than the other types of complete streets. These tend to have generous sidewalks, landscaping, and street trees. All downtown streets will meet Type IV criteria to a minimum.

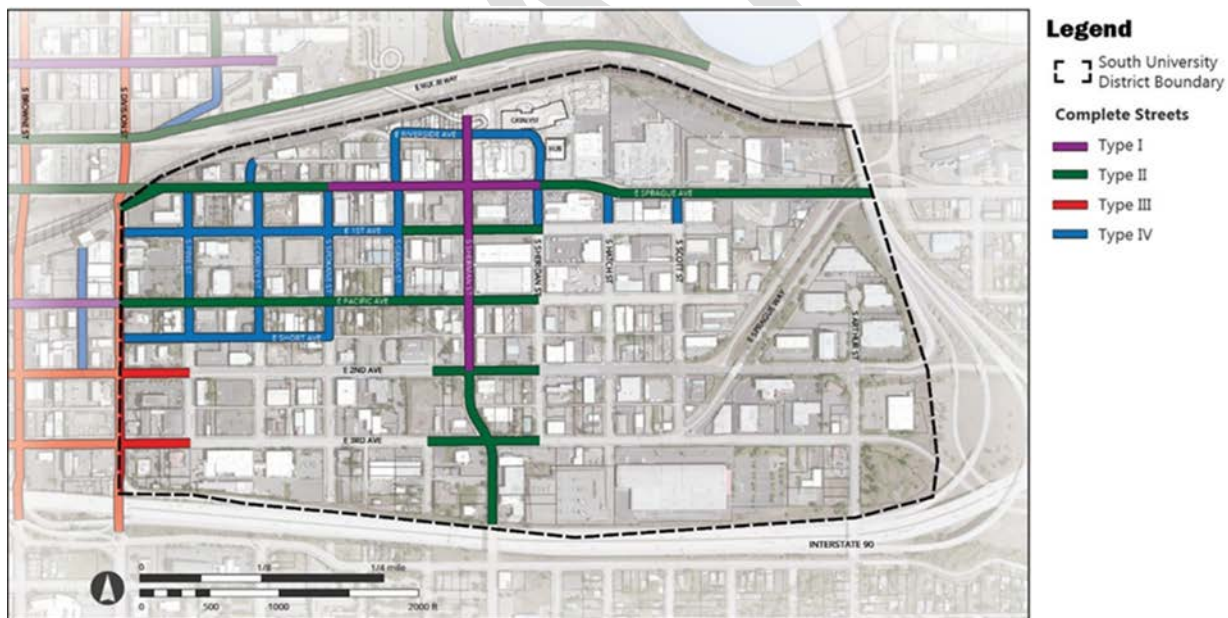


Figure 6 – Proposed Complete Streets Designations for Areas within DTU Zone

The Community Design Workshop, online survey, and other community engagement efforts involved stakeholders in prioritizing key streets for pedestrian activity and storefront-oriented building frontages. These priorities are shown on the Block Frontages and Complete Streets Concepts map in

⁷ The Complete Streets designation contained in Downtown zones is distinct from the Complete Streets Program set forth in the City's Engineering Standards in SMC Chapter 17H.020. The Complete Streets Program focuses on overall roadway design and safety of multimodal users.

the draft *Subarea Plan*,⁸ and serve as the basis for the proposed Complete Streets designations shown in the plan and as Figure 7 of this report.

Consistent with stakeholder-identified priorities for block frontages, MAKERS' proposed Complete Streets designations concentrate the most pedestrian-oriented classification (Type I – Community Activity Street) on the Sprague Avenue and Sherman Street intersection, with Type II – Community Connector streets designated on the eastern and western portions of Sprague, on Sherman south of the intersection with 2nd Avenue, on Pacific Avenue west of Sherman, and on block frontages immediately east and west of Sherman. **Staff recommends adopting the proposed designations in the draft *Subarea Plan*, with the following revisions** for the purpose of continuity with existing streets in the system:

- Designate Pacific Avenue west of Sherman (within DTU zone Optional Extension #2) as a Type I – Community Activity Street, consistent with the existing designation on Pacific west of Division Street
- Designate the portions of 2nd and 3rd Avenues intersecting with Sherman (within DTU zone Optional Extension #1) as a Type III – City-Regional Connector, consistent with the existing designation on this couplet west of Pine Street
- Designate other block frontages leading to Sherman (1st Avenue and Pacific Avenue east of Sherman) as Type IV – Neighborhood Streets, anticipating that they will continue to carry relatively little through traffic and have less commercial activity than other primary routes.

DESIGNATION OF DESIGN REVIEW THRESHOLD AREA (SMC 17G.040-M1)

Certain project types are always subject to review by the Design Review Board. Within Downtown zones, additional project types are also subject to Design Review, based on the area (Central, Gateway, and Perimeter) in which they are located on the Downtown Design Review Threshold Map (SMC 17G.040-M1). The proposed extension of DTU zoning extends would about an existing portion of the Perimeter Area (immediately to the north, across the BNSF tracks). Generally, the Central area has been applied in the Downtown core, and Gateway areas have been applied along arterials extending northward from on/off ramps at I-90. Therefore, the subarea plan recommends **including the DTU-zoned portions of the South University District in the Perimeter Area** of the Downtown Design Review Threshold Map.

Within the Perimeter Area, Design Review is additionally applied to new buildings and structures greater than 50,000 square feet, and modification of more than 25 percent (at minimum 300 square feet) of a building façade visible from an adjacent street. This additional review of large-scale projects, and more significant façade modifications near the Sprague and Sherman node is consistent with stakeholder interest in greater design attention at this focal point of the subarea.

IMPLEMENTATION OF COMPREHENSIVE PLAN GOALS AND POLICIES

Using the Comprehensive Plan for overall guidance, the more detailed planning undertaken for subareas like the South University District help ensure implementation of citywide goals and policies

⁸ *South University District Subarea Plan*, February 2020 draft, pg. 18.

focused at a smaller scale (see *Goal LU 7 – Implementation* and *Policy LU 7.4 – Sub-Area Planning Framework*). A review of Comprehensive Plan goals and policies and other supporting documents indicates that the proposal meets the approval criteria for internal consistency set forth in SMC 17G.020.030.G. The analysis below identifies the Comprehensive Plan goals and policies which the proposal most directly implements.

LAND USE GOALS

Land Use Goal LU 2 – Public Realm Enhancement

Goal: Encourage the enhancement of the public realm.

Staff Analysis: The proposal would extend DTU zoning into portions of the subarea in and around the node centered on the intersection of Sprague Avenue and Sherman Street, the Sherman Plaza, and the University District Gateway Bridge. DTU zoning encourages the enhancement of the public realm through implementation of Downtown design guidelines, streetscape standards associated with Complete Streets designations, and application of Design Review to certain projects.

Land Use Goal LU 3 – Efficient Land Use

Goal: Promote the efficient use of land by the use of incentives, density and mixed-use development in proximity to retail businesses, public services, places of work, and transportation systems.

Staff Analysis: The South University District is centrally located within the Spokane metropolitan area, within the designated Downtown Spokane Regional Center, in an area well-served by existing services and transportation systems. The subarea is adjacent to the Downtown core, the WSU-Spokane Health Sciences campus, the Sprague Union district, and the concentration of health care providers on the lower South Hill. The subarea is within an identified Target Investment Area, and revitalization of the area is coordinated by a public development authority and funded by a variety of incentives and a tax increment finance district. The proposal aligns Land Use Plan Map and zoning designations for the South University District with the incentives, economic development strategies, and infrastructure investments already in place for the subarea. The proposed DTU zoning on the south landing and along Sprague Avenue and Sherman Street ensures that future development occurring at this key district node makes efficient use of the multimodal infrastructure and other supportive programs that have been put in place.

ECONOMIC DEVELOPMENT GOALS

Economic Development Goal ED 2 – Land Available for Economic Activities

Goal: Ensure that an adequate supply of useable industrial and commercial property is available for economic development activities.

Economic Development Goal ED 3 – Strong, Diverse, and Sustainable Economy

Goal: Foster a strong, diverse, and sustainable economy that provides a range of employment and business opportunities.

Staff Analysis: The proposed map changes ensure that an adequate supply of usable property is available for a range of economic activities especially suited to the subarea (see *Policy ED 2.1 –*

Land Supply). As described in the “Background” section above, the subarea is located within the larger 770-acre University District, which has been designated as a Target Investment Area, and both public and private stakeholders have placed considerable emphasis on the potential of the South University District as a site for a concentration of private sector employers in health sciences, energy, and other industry clusters benefiting from close proximity to the array of university campuses in the district and health care providers on the lower South Hill (see *Policy ED 3.8 – Technology-Based Industries*).

The existing GC-150 zoning limits the FAR of non-residential uses to 2.5, limiting the intensity of office, laboratory, and institutional development throughout the subarea, including the south landing and Sprague and Sherman frontages, where proximity to the WSU-Spokane Health Sciences campus and multimodal infrastructure increases demand for these uses. Development to support a concentration of employment near the south landing and within the “T” is further complicated by higher off-street parking requirements than other districts adjacent to the Downtown core, which are typically zoned DTG, DTU, or DTS. These minimum requirements for off-street parking force potential developers to aggregate larger sites to accommodate surface parking lots, which presents a particular challenge given the smaller parcels and topographic constraints often found in the South University District. The proposal to change the zoning in these areas from GC-150 to DTU would increase the non-residential FAR from 2.5 to 6, and reduce minimum off-street parking requirements to one space per 1,000 square feet, effectively increasing the supply of land available to meet the needs of emerging innovation-based industry clusters.

In addition, the subarea serves an important role as a retail, wholesale, and light industrial hub in a central location adjacent to the Downtown core. In addition to close proximity to Downtown, university campuses, hospitals, and other activity generators, businesses located in the South University District have efficient transportation links to the regional market through the I-90 freeway, Division Street (US 395), and 2nd/3rd Avenue couplet. The wide range of businesses in the subarea include successful new and multigenerational enterprises, and contribute to one of the region’s highest employment densities. Many of the smaller, older existing buildings in the subarea provide flexible, low-cost space conducive to small, emerging, locally-owned firms that contribute to overall job growth in the region. The proposal to retain GC-150 zoning in approximately 136 acres at the southeast and southwest portions of the subarea is meant to maintain space for a range of commercial and light industrial uses, and offer flexibility in building configuration and provisions for freight and operations that may be more difficult to achieve in a densely developed area characteristic of a Downtown zone (see *ED 3.2 – Economic Diversity*; *ED 3.5 – Locally-Owned Businesses*; and *ED 3.6 – Small Businesses*).

APPROVAL CRITERIA (SMC 17G.020.030)

SMC Section 17G.020.030 establishes the approval criteria for Comprehensive Plan amendments, including Land Use Plan Map amendments. In order to approve a Comprehensive Plan Land Use Plan Map amendment request, the decision-making authority shall make findings of fact based on evidence provided by the applicant that demonstrates satisfaction of all the applicable criteria. The applicable criteria are shown below in ***bold italic*** print. Following each criterion is staff analysis relative to the amendment requested.

A. Regulatory Changes

Amendments to the comprehensive plan must be consistent with any recent state or federal legislative actions, or changes to state or federal regulations, such as changes to the Growth Management Act, or new environmental regulations.

Staff Analysis: Staff reviewed and processed the proposed amendment under the most current regulations contained in the Growth Management Act, the Washington State Environmental Policy Act (SEPA), and the Spokane Municipal Code. Staff is unaware of any recent federal, state, or legislative actions with which the proposal would be in conflict, and no comments were received to this effect from any applicable agencies receiving notice of the proposal. The proposal meets this criterion.

B. GMA

The change must be consistent with the goals and purposes of the state Growth Management Act.

Staff Analysis: The Growth Management Act (GMA) details 13 goals to guide the development and adoption of the comprehensive plans and development regulations (RCW [36.70A.020](#), “Planning Goals”), and these goals guided the City’s development of its comprehensive plan and development regulations. This proposal has been reviewed for GMA compliance by staff from the Washington Department of Commerce. No comments received or other evidence in the record indicates inconsistency between the proposed plan map amendment and the goals and purposes of the GMA. The proposal meets this criterion.

C. Financing

In keeping with the GMA’s requirement for plans to be supported by financing commitments, infrastructure implications of approved comprehensive plan amendments must be reflected in the relevant six-year capital improvement plan(s) approved in the same budget cycle.

Staff Analysis: The area of the proposed land use and zoning map changes is a previously-developed, central location within the city served by existing urban facilities and services. City departments and partner agencies responsible for providing public services and facilities have reviewed the proposal and have not indicated any concerns regarding financing commitments or other infrastructure implications that would result from the proposal. The proposal meets this criterion.

D. Funding Shortfall.

If funding shortfalls suggest the need to scale back on land use objectives and/or service level standards, those decisions must be made with public input as part of this process for amending the comprehensive plan and capital facilities program.

Staff Analysis: As described in response to criterion (C) above, the proposal would change land use, zoning, and overlay map designations in a centrally-located area already served by urban facilities and services, particularly after streetscape and utility upgrades to Sprague Avenue are completed later in 2020. The proposal itself does not involve a specific development project. Implementation of the concurrency requirement, as well as applicable development regulations and transportation impact fees, will ensure that development is consistent with adopted comprehensive plan and capital facilities standards, or that sufficient funding is available to mitigate any impacts to existing infrastructure networks. The proposal meets this criterion.

E. Internal Consistency

- 1. The requirement for internal consistency pertains to the comprehensive plan as it relates to all of its supporting documents, such as the development regulations, capital facilities program, shoreline master program, downtown plan, critical area regulations, and any neighborhood planning documents adopted after 2001. In addition, amendments should strive to be consistent with the parks plan, and vice versa. For example, changes to the development regulations must be reflected in consistent adjustments to the goals or policies in the comprehensive plan. As appropriate, changes to the map or text of the comprehensive plan must also result in corresponding adjustments to the zoning map and implementation regulations in the Spokane Municipal Code.***

Staff Analysis: The proposal is internally consistent with applicable supporting documents of the Comprehensive Plan as follows:

Development Regulations. The proposal to amend the Land Use Plan Map is accompanied by several amendments to zoning and overlay maps to implement a regulatory framework consistent with the proposed “Downtown” land use designation. The proposal includes a concurrent Zoning Map amendment for the affected area to DTU (Downtown University), a zone implementing the “Downtown” designation. In addition, overlays implementing certain aspects of Downtown development and design standards (Complete Streets designations and Downtown Design Review Thresholds) would be extended to match the amended boundary of the “Downtown” land use designation, to ensure consistent application of implementing regulations.⁹ Other overlays (the Downtown Parking Area providing for no minimum off-street parking requirement and the Surface Parking Limited Overlay) are generally associated with Downtown zones but do not need to be extended to ensure consistency

Capital Facilities Program. As described in the staff analysis of Criterion C above, no additional infrastructure or capital expenditures by the City are anticipated for this non-

⁹ Two other overlays, the Downtown Parking Area providing for no minimum off-street parking requirement and the Surface Parking Limited Overlay, are generally associated with Downtown zones but are not required to implement development standards adopted for the base zone.

project action, and it is not anticipated that the City's integrated Capital Facilities Program would be affected by the proposal.

Fast Forward Spokane Downtown Plan. The City of Spokane adopted the *Fast Forward Spokane Downtown Plan Update*, which updated the 1999 Downtown Plan. In 2019, the City and Downtown Spokane Partnership began a second update of the Downtown Plan, with plan adoption expected in 2020. *Fast Forward Spokane* included a "South University District Analysis" as an appendix to the plan, including an analysis of opportunities and constraints, circulation and land use frameworks, and inventory of opportunity sites. This analysis section was presented as a supplemental study to *Fast Forward Spokane*, and the area was not included in zoning or development code changes adopted to implement the plan in 2009. The subject proposal for the South University District has been developed in coordination with the current Downtown Plan update process to ensure consistency between the subarea plans and any ensuing map and development code regulations.

Neighborhood Planning Documents Adopted after 2001. The South University District is within the East Central Neighborhood Council boundary. In 2006, City Council recognized the *East Central Neighborhood Plan* "as a declaration of the neighborhood's desired future condition, providing direction for neighborhood-based improvement activities and reflecting the neighborhood's priorities for its future."¹⁰ The plan does not identify any specific changes to the land use designations for the South University District, and indicates that strategic planning processes specific to the University District may address more detailed land use issues in the subarea. In 2009, the East Central Neighborhood Council used neighborhood planning funds for design work on improvements to the Ben Burr Trail, and did not address land use or zoning issues in their planning process.

The subject proposal to change the land use designation and zoning for the affected area is internally consistent with applicable neighborhood planning documents.

Comprehensive Plan Goals and Policies. As described in further detail in Section V, subsection "Implementation of Comprehensive Plan Goals and Policies" within this report, the proposal is consistent with adopted Comprehensive Plan goals and policies.

- 2. If a proposed amendment is significantly inconsistent with current policy within the comprehensive plan, an amendment proposal must also include wording that would realign the relevant parts of the comprehensive plan and its other supporting documents with the full range of changes implied by the proposal.***

Staff Analysis: The proposal is generally consistent with current Comprehensive Plan policies, as described in further detail in the staff analysis of Criterion K.2 below and other criteria in

¹⁰ City Council Resolution 2006-0032. As prescribed in SMC 04.12.010, the City Council resolution recognizing this plan is not an action to amend the City's Comprehensive Plan or development regulations by recommendation of the Plan Commission.

this report. Therefore, no amendment to policy wording is necessary and this criterion does not apply to the subject proposal.

F. Regional Consistency.

All changes to the comprehensive plan must be consistent with the countywide planning policies (CWPP), the comprehensive plans of neighboring jurisdictions, applicable capital facilities or special district plans, the regional transportation improvement plan, and official population growth forecasts.

Staff Analysis: The proposed change in land use designation from “General Commercial” to “Downtown” applies to land near the center of the urbanized area in the Spokane region, would result in a relatively small (approximately 8 percent) increase in the overall area designated “Downtown” on the Land Use Plan Map, and is immediately adjacent to other areas designated “Downtown” to the north and west. Due to the scale and location of the proposal, there are no foreseeable implications to regional or interjurisdictional policy issues. No comments have been received from any agency, City department, or neighboring jurisdiction which would indicate that this proposal is not regionally consistent. The proposal meets this criterion.

G. Cumulative Effect.

All amendments must be considered concurrently in order to evaluate their cumulative effect on the comprehensive plan text and map, development regulations, capital facilities program, neighborhood planning documents, adopted environmental policies and other relevant implementation measures.

1. Land Use Impacts.

In addition, applications should be reviewed for their cumulative land use impacts. Where adverse environmental impacts are identified, mitigation requirements may be imposed as a part of the approval action.

2. Grouping.

Proposals for area-wide rezones and/or site-specific land use plan map amendments may be evaluated by geographic sector and/or land use type in order to facilitate the assessment of their cumulative impacts.

Staff Analysis: The proposed Land Use Plan Map amendment would change the zoning of a 63-acre area from GC-150 to DTU. Subarea planning for the North Bank, just to the north of the Downtown core, has taken place on a similar timeline as the South University District. An update of the *Fast Forward Downtown Plan*, which encompasses a planning area that includes both the South University District and North Bank, started in late 2019 and will

continue through 2020. The overlapping schedule of subarea planning processes has allowed staff to monitor proposed land use changes emerging from each subarea and take cumulative impacts into consideration throughout the process.

Subarea planning for the North Bank is expected to result in a proposal change the Land Use Plan Map designation of approximately 82 acres from “General Commercial” and “Office,” to “Downtown” and rezone the same area from CB-150 (Community Business with 150 foot height limit) and OR-150 (Office Retail with 150 foot height limit) to DTG (Downtown General). There is almost no difference in the development standards that apply in the DTG and DTU zones, meaning that the two subarea plans would result in a cumulative increase of approximately 145 acres in these two nearly identical zones. Under the two proposals, total acreage within any Downtown zoning designation (DTC, DTG, DTU, or DTS) would increase from 788 acres to 933 acres, or 18.4 percent.

The close coordination between the subarea planning processes has allowed both subarea plans to take the potential cumulative impacts of their proposed changes into consideration during the planning process. While the change from GC-150, CB-150, or OR-150 to DTG or DTU zoning involves some differences in allowed uses and application of development and design standards, an increase in the floor area ratio (FAR) for non-commercial uses is the most prominent cumulative difference that would result from the zone changes proposed under the two subarea plans. In the North Bank, approximately 82 acres would see an increase in non-residential FAR from 4.5 to 6, and in the South University District, FAR would increase from 2.5 to 6 for approximately 63 acres. Because there is no maximum FAR for residential uses in the existing or proposed zoning involved in either subarea plan, the proposal does not result in any cumulative change in development capacity for housing.

Proposed changes to the in Land Use Plan map designation and zoning in the South University District apply to just under 30 percent of the subarea. The proposed change to a “Downtown” designation and DTU zoning is focused on areas where projected demand for larger office and other concentrated employment uses is highest, specifically preserving the remainder of the subarea for the existing range of residential, commercial, and light industrial uses and minimizing the cumulative impact of a district-wide zone change.

The proposal meets this criterion.

H. SEPA.

SEPA review must be completed on all amendment proposals and is described in chapter 17E.050.

1. Grouping.

When possible, the SEPA review process should be combined for related land use types or affected geographic sectors in order to better evaluate the proposals' cumulative

impacts. This combined review process results in a single threshold determination for those related proposals.

2. DS.

If a determination of significance (DS) is made regarding any proposal, that application will be deferred for further consideration until the next applicable review cycle in order to allow adequate time for generating and processing the required environmental impact statement (EIS).

Staff Analysis: The application is under review in accordance with the State Environmental Policy Act (SEPA), which requires that the potential for adverse environmental impacts resulting from a proposal be evaluated during the decision-making process. On the basis of the information contained in the environmental checklist, written comments from local and State departments and agencies concerned with land development within the City, and a review of other information available to the Director of Planning Services, a Determination of Non-Significance was issued on February 21, 2020. The proposal meets this criterion.

I. Adequate Public Facilities.

The amendment must not adversely affect the City's ability to provide the full range of urban public facilities and services (as described in CFU 2.1 and CFU 2.2) citywide at the planned level of service, or consume public resources otherwise needed to support comprehensive plan implementation strategies.

Staff Analysis: The proposed map changes affect an area approximately 63 acres in size, in a built-up area adjacent to the downtown core and served by the public facilities and services described in CFU 2.1. Significant infrastructure upgrades in recent years have included capacity upgrades to City utilities serving the area. The proposed map changes affect a relatively small area, do not include a development proposal, and do not measurably alter demand for public facilities and services in the vicinity of the proposal or on a citywide basis. All affected departments and outside agencies providing services to the subject properties have had an opportunity to comment on the proposal and no agency or department offered comments suggesting the proposal would affect the City's ability to provide adequate public facilities to the property or surrounding area or consume public resources otherwise needed to support comprehensive plan implementation strategies. Any subsequent development of the site will be subject to a concurrency determination pursuant to SMC [17D.010.020](#), thereby implementing the policy set forth in CFU 2.2. The proposal meets this criterion.

J. UGA.

Amendments to the urban growth area boundary may only be proposed by the city council or the mayor of Spokane and shall follow the procedures of the countywide planning policies for Spokane County.

Staff Analysis: The application does not propose an amendment to the urban growth area boundary. This criterion does not apply.

K. Demonstration of Need.

1. Policy Adjustments.

Proposed policy adjustments that are intended to be consistent with the comprehensive plan should be designed to provide correction or additional guidance so the community's original visions and values can better be achieved. [...]

Staff Analysis: The proposal is for a map change only and does not include any proposed policy adjustments. Therefore, this subsection does not apply.

2. Map Changes.

Changes to the land use plan map (and by extension, the zoning map) may only be approved if the proponent has demonstrated that all of the following are true:

- a. The designation is in conformance with the appropriate location criteria identified in the comprehensive plan (e.g., compatibility with neighboring land uses, proximity to arterials, etc.);*

Staff Analysis: Comprehensive Plan policies related to Downtown generally emphasize its role as a Regional Center featuring diverse uses, without providing specific locational criteria or guidance on what type of areas are most or least suitable for expansion of the Downtown designation. The location of the proposed Land Use Plan Map amendment is within the "Downtown Boundary" designated in the 2009 *Fast Forward Spokane Downtown Plan Update* and is contiguous with existing areas designated "Downtown" on the Land Use Plan Map and zoned either DTG or DTU. The proposal meets subsection (a).

- b. The map amendment or site is suitable for the proposed designation;*

Staff Analysis: The proposal includes a concurrent Zoning Map change for the affected area to DTU (Downtown University) to implement the proposed "Downtown" Land Use Plan Map designation. SMC 17C.124.030.C describes the DTU zone as follows:

"Downtown University (DTU).

The downtown university zone encourages a wide range of uses that support the ongoing development of an urban inner city university. A pedestrian friendly and safe urban environment is encouraged along with a wide range of residential, office, retail, and other supporting commercial uses."

In the proposed location, the “Downtown” land use designation and accompanying DTU zoning align closely with this description by allowing dense development of office, laboratory, and other uses that complement the research and education functions of the adjacent WSU-Spokane Health Sciences campus and other universities in the district, and provide space for continued employment growth in the district. The proposed location of the DTU zone extension along Sprague Avenue and Sherman Streets, and the pedestrian friendly urban environment encouraged in the DTU zone aligns with stakeholder emphasis on these streets as a focal point for the subarea.

The proposal meets subsection (b).

c. The map amendment implements applicable comprehensive plan policies and subarea plans better than the current map designations.

Staff Analysis: As described in further detail in Section V, subsection “Implementation of Comprehensive Plan Goals and Policies” within this report, the proposal is intended to create a pattern of land use designation and zoning in the subarea that better implements adopted Land Use and Economic Development Goals adopted in the Comprehensive Plan. In particular, the proposal allows for concentration of high density employment growth in close proximity to investments and multimodal transportation and other public infrastructure (see Land Use policies LU 3.1 and 4.6) and ensures that land is available for employment growth in targeted industry clusters (Economic Development policies ED 2.1 and ED 3.8) and for the retention and expansion of existing businesses in the subarea (Economic Development policies ED 3.2, ED 3.5, and ED 3.6).

Comprehensive Plan Policy LU 1.9 – Downtown, provides in part that “major land use changes within the city should be evaluated to identify potential impacts on Downtown.” As described in the staff analysis of Criterion G above, the proposal has been evaluated for the cumulative increase in commercial development capacity caused by extending the Downtown designation in the South University District and North Bank subareas. The proposed extension of the Downtown designation in the South University District is applied to a focused area, rather than spread district-wide, in part to avoid impacts to the existing Downtown core from overextension of Downtown zoning.

The proposal meets subsection (c).

3. Rezones, Land Use Plan Map Amendment.

Corresponding rezones will be adopted concurrently with land use plan map amendments as a legislative action of the city council. If policy language changes have map implications, changes to the land use plan map and zoning map will be made accordingly for all affected sites upon adoption of the new policy language. This is done to ensure that the comprehensive plan remains internally consistent and to preserve consistency between the comprehensive plan and supporting development regulations.

Staff Analysis: If the Land Use Plan Map amendment is approved as proposed, the zoning designation of the affected area will change from GC-150 (General Commercial with 150-foot height limit) to DTU (Downtown University). The DTU zone implements the Downtown land use designation proposed for the affected area. No policy language changes have been identified as necessary to support the proposed Land Use Plan Map amendment, which is consistent with adopted Comprehensive Plan Land Use and Economic Development goals and policies as described elsewhere in this report. The proposal meets this criterion.

RECOMMENDED FINDING

Staff recommends that the Plan Commission find that the proposal meets the approval criteria set forth in SMC Section 17G.020.030.

VI. CONCLUSION

Staff finds that the proposed *South University District Subarea Plan* reflects a more detailed look at land use issues within a focused area, consistent with the approach set forth in Comprehensive Plan Land Use Policy LU 7.4 – Sub-Area Planning Framework. The proposed Comprehensive Plan Amendment to amend the Land Use Plan Map, and concurrent changes to zoning and overlay maps are consistent with Comprehensive Plan Land Use Goal LU 3 and Economic Development Goals ED 2 and ED 3. The proposal is also consistent with each of the approval criteria for a Comprehensive Plan Amendment set forth in SMC Section 17G.020.030.

Staff recommends that the Plan Commission adopt the facts and findings of the staff report and make a recommendation that City Council approve a resolution recognizing the *South University District Subarea Plan* and an ordinance adopting the proposed Comprehensive Plan Amendment and concurrent zoning and overlay map changes.

VII. EXHIBITS

- A. Proposed Comprehensive Plan Land Use Plan Map Amendment
- B. Proposed Amendments to Zoning Map
- C. Proposed Designations of Complete Streets within the South University District subarea (Downtown Map 5.1 “Complete Streets”)
- D. Proposed Amendments to Surface Parking Limited Overlay Map (SMC 17C.124-M1)
- E. Proposed Amendments to Downtown Design Review Threshold Map (SMC 17G.040-M1)

EXHIBIT A: PROPOSED COMPREHENSIVE PLAN LAND USE MAP AMENDMENTS

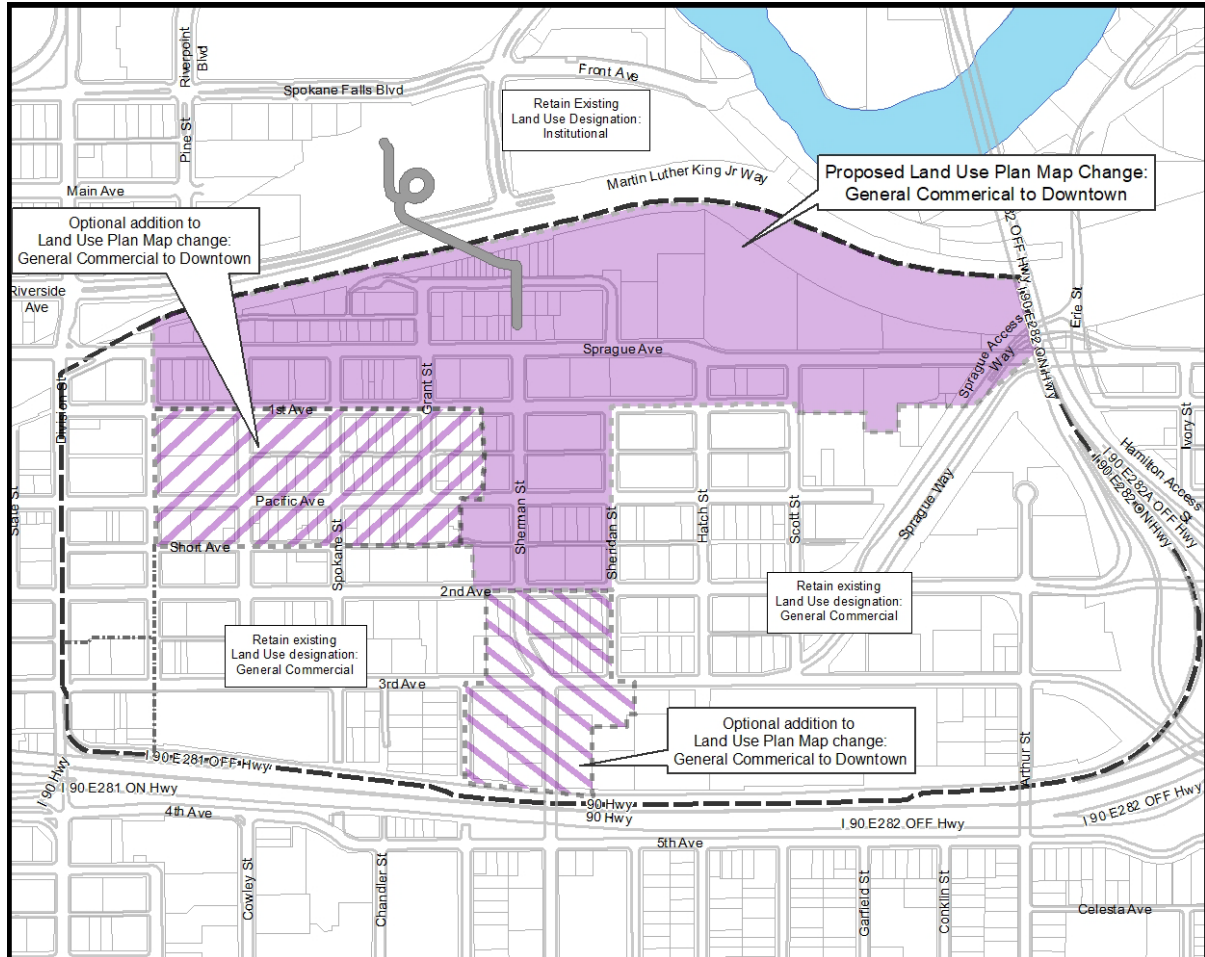
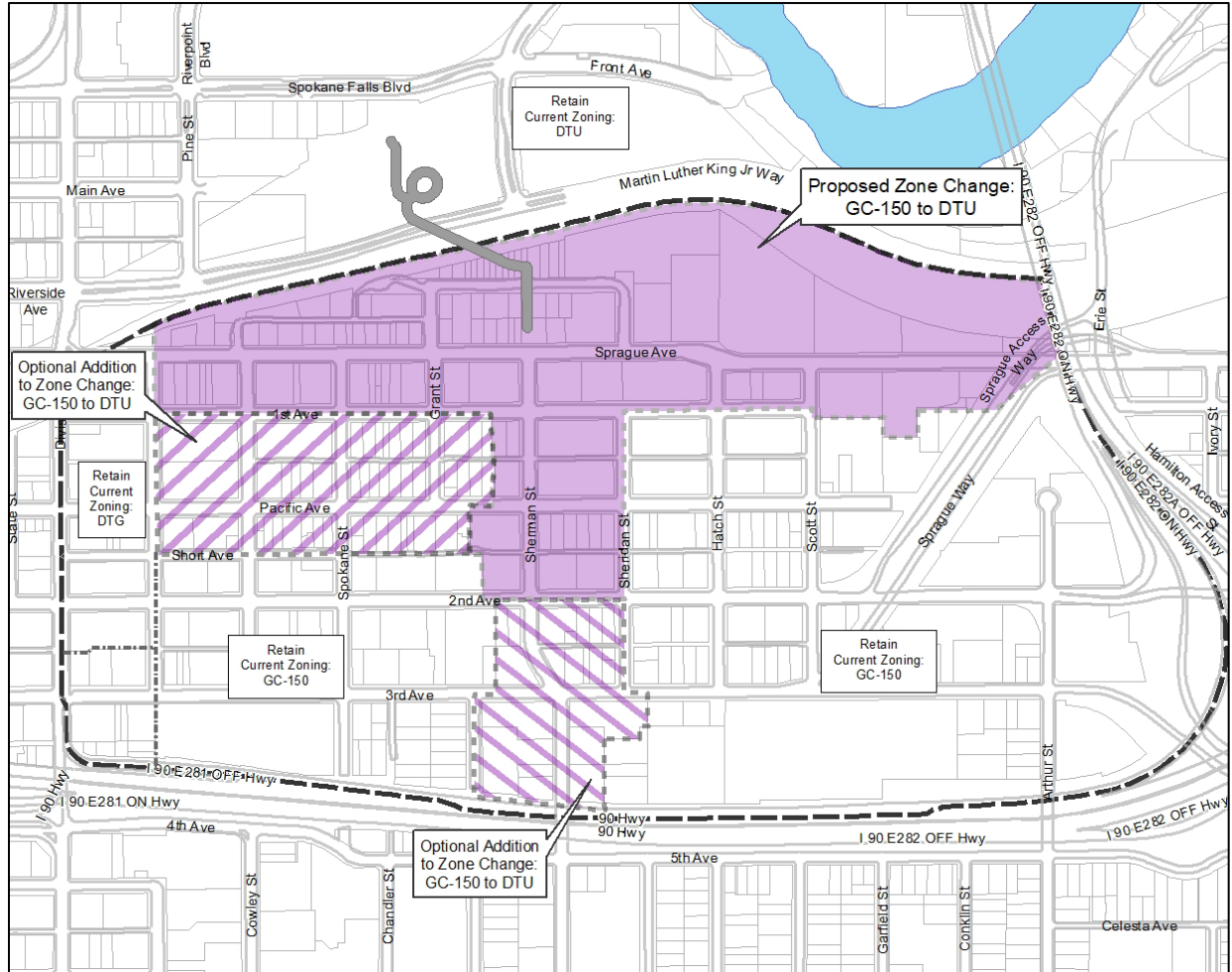


EXHIBIT B: PROPOSED ZONING MAP AMENDMENTS



Amending Downtown Plan Map 5.1 “Complete Streets”

EXHIBIT D: PROPOSED AMENDMENT TO SURFACE PARKING LIMITED OVERLAY

(SMC 17C.124-M1)

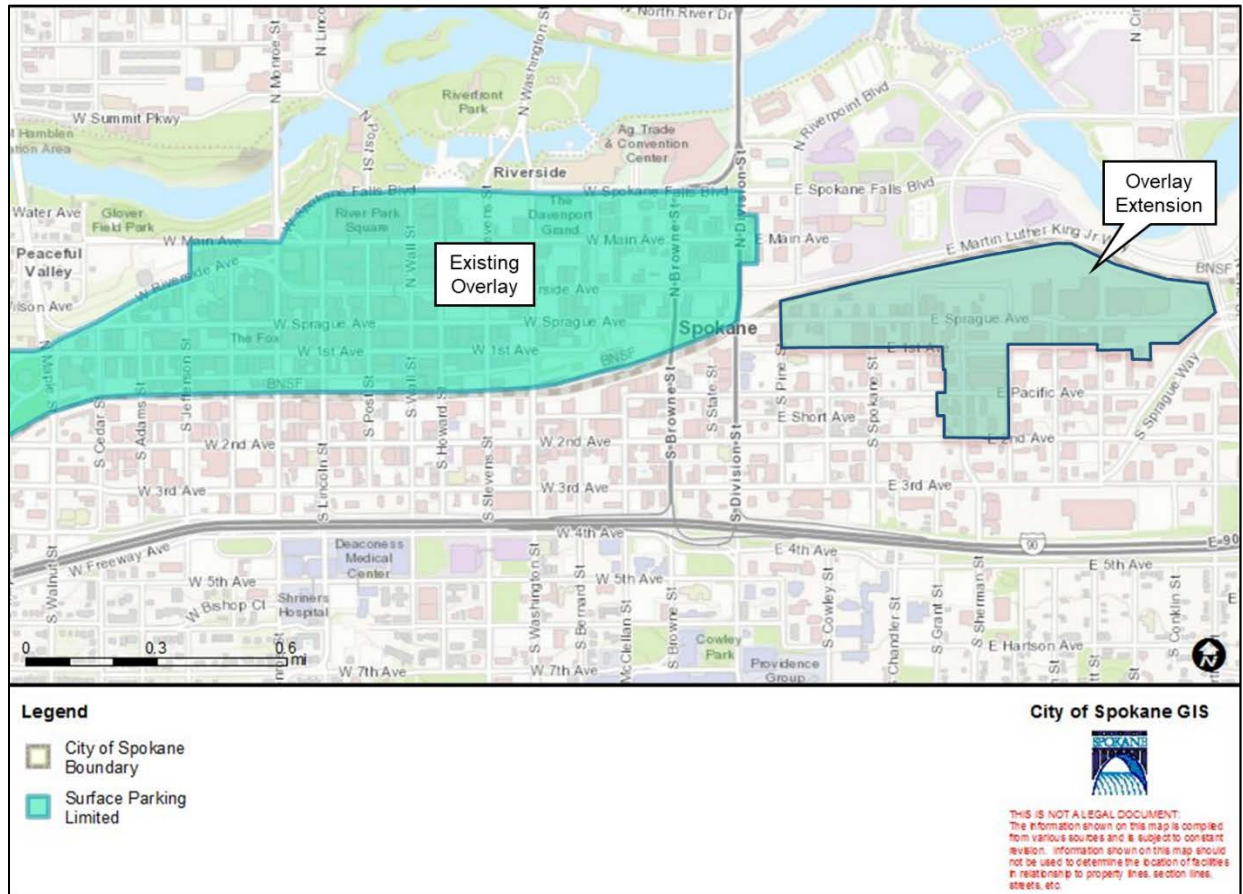


EXHIBIT E: PROPOSED AMENDMENT TO DOWNTOWN DESIGN REVIEW THRESHOLD MAP

(SMC 17G.040-M1)

