



Whipple Consulting Engineers, Inc.

WCE No. 25-4026
September 30, 2025

City of Spokane, Development Services
808 W Spokane Falls Boulevard
Spokane, WA 99201

Attn: Melissa Owen, Planner II

Re: **Strong Road Subdivision – a residential development**
Response to Comments dated August 14, 2025

Dear Ms. Owen:

WCE is in receipt of the comments for the Strong Road Preliminary Long Plat, Z25-456.PPLT dated August 14, 2025. As part of those comments, we have made several changes and corrections. Please see our comments below:

City of Spokane Fire Prevention Engineer
Conditional Approval

A. Per attached email from Dave Kokot dated July 28, 2025, the access road will need to meet the dimensional requirements for a Fire access road as well as the hammerhead turnaround.

WCE Response: This comment has been noted. WCE has reviewed the turnaround requirements and it is our understanding that we meet the dimensional requirements for a fire access road as well as the hammerhead turnaround.

Historic Preservation
Conditional Approval

Per email from Logan Camporeale, City of Spokane, Historic Preservation, the outbuildings were reviewed for eligibility and possible deconstruction, but buildings were found ineligible after conducting a site visit. No further Historic Preservation review of the demolition is required. The following condition of approval was identified for future development.

B. An Inadvertent Discovery Plan and circulate it with all contractors who engage in ground disturbing activities.

WCE Response: This comment will be addressed at time of construction.

City Treasurer

Per attached email from Cara Geiger on 08/14/25, No LIDS impact this property.

WCE Response: This comment has been noted.

Planning Department (incorporated into this letter, no separate memo):
Revisions/Clarifications Required.

The following comments need to be addressed prior to deeming the application technically complete and moving the application to public notice and hearing.

Narrative.

9. *Private Streets are subject to Public Street Standards. This proposal does not meet private street standards. Instead, access has been provided via a private access/~~driveway~~ as permitted under the Unit Lot Development Code and 17H.010.090 (amended in progress) and consistent with criteria for use by Emergency Services and Solid Waste Collection. Please revise the narrative to remove reference to a private street and replace it with private access/~~driveway~~.*

WCE Response: The narrative has been revised to replace private streets with private access/access.

10. *The narrative indicates that the project is intended to be phased and that a phasing plan was included. No phasing plan was found in the submittal materials. If this proposal is intended to be phased, please provide a copy of the phasing plan or update the narrative to remove reference to phasing.*

WCE Response: References to phasing have been removed.

Preliminary Long Plat Supplemental Application

11. *Please update/clarify question 1., answer D. to address use of the unit lot subdivision code. The parent site, not individual lots within the Unit Lot Subdivision, is required to meet the development standards found in 17C.111. Individual lots created via the Unit Lot Subdivision proposal do not have street frontage but are instead served by private access/~~driveway~~ which is permitted under the Unit Lot Subdivision code.*

WCE Response: Question 1 Answer D has been clarified to address use of the unit lot subdivision code regarding allowed deviations from frontage, setbacks, building coverage and density for child lots.

12. *Please clarify if this below highlighted detail should be 17C.111 Residential Zones for question 1, answer F.*

The remaining portions of Section 17C.111.2xx are or will be met as appropriate.

WCE Response: Question 1 Answer F has been updated to reference Chapter 17C.111. Originally, 2xx was specified because the 200 series sections (more specifically 200-235) discuss land use standards, and the remaining sections generally discuss design and building standards, which are not directly applicable to a platting action.

13. *Question 2 – several of the responses refer to development of private streets for which standards are not met. Please review and update responses to indicate use of private access/~~driveway~~ instead of private street or road serving individual lots in this development pursuant to the Unit Lot Subdivision Code 17G.080.065(D)(9).*

WCE Response: All references to private streets in the narrative and preliminary plat application have been removed and replaced with private access.

14. Question 5 – since this project is SEPA exempt and therefore the SEPA checklist was not distributed, please remove reference to the SEPA checklist.

WCE Response: All references to a SEPA Checklist for this project have been removed.

15. Question 6d – please update reference to internal roadways to private access/~~driveway~~ to reflect that this access for vehicles is neither a public nor a private street.

WCE Response: All references to private streets in the narrative and preliminary plat application have been removed and replaced with private access.

Trip Generation and Distribution Letter

16. Please update the project description to remove reference to private street and roads for which standards are not met and replace these references with private access/driveway consistent with the Unit Lot Subdivision Code 17G.080.065(D)(9) and 17H.010.090 (amended in progress).

WCE Response: All references to private streets in the narrative and preliminary plat application have been removed and replaced with private access.

Preliminary Plat Map.

17. Add “Unit Lot Subdivision” to the title block.

WCE Response: Unit Lot Subdivision has been added to the title block.

18. Please add phone number of the owner/person with whom official contact should be made regarding the application to the map.

WCE Response: The phone number of the owner has been added to the preliminary plat.

19. Please update required minimum density to 6.

WCE Response: The required minimum density has been updated to 6.

20. Please add proposed density to the map site data table. Calculating density is described in Section 17C.111.210 Density.

WCE Response: The proposed density has been updated to 9.

21. Add the total number of housing units proposed and the number of units on each lot. The number of units per lot can be added to each lot or to the site data table. Consistent with the general application and other preliminary plat materials this should be 1 unit/lot; total of 12 units.

WCE Response: The number of housing units and number of units on each lot has been updated on the preliminary plat to 12 units on 12 lots.

22. Add condition of adjacent properties (platted/plat name or unplatted).

WCE Response: The platted/unplatted condition of adjacent properties has been added to the preliminary plat.

23. *Show setbacks from existing retained home to proposed new lot lines.*

WCE Response: Setbacks have been shown from the existing retained home to proposed new lot lines.

24. *Please show the parent site setback on the map or provide the parent site setback detail in text format (W. Strong is the front, north lot line the rear, east and west lot lines the sides).*

Parent Site Setbacks (living space), are as follows:

1. Front 10'

2. Side 5'

3. Rear 15'

WCE Response: Parent site setbacks are identified on the preliminary plat in text format.

25. *Please update the plat map and site data table to address 17G.080.065(D)(6) General Regulations which states that portions of the parent site designated for common use shall be identified as Tracts owned in common by the owners of the child lots or a larger collective organization.*

1. The ~~driveway~~ private access providing vehicle access to all lots should be identified as a tract. Depending on the design for a distinct pedestrian connection within the development to the public right of way, the access tract may need to be updated.

WCE Response: The private access has been updated to state "Private Access/Utility Tract "A"".

Conditions of Approval/General Comments for Final Plat.

The following items are conditions of approval recommended by planning for incorporation into a decision on the preliminary plat.

C. For those structures slated for demolition, a separate demolition permit is required for structures over 200 sq. ft. Demolition will need to be completed prior to approval of the final plat.

D. Please ensure that the vicinity map is of a scale that provides for street names to be legible when printed at full size for recording. Please also update the map to black and white only.

E. To address concurrency related to sidewalks, pathways, and other features that assure safe walking conditions, planning recommends as a condition of approval that a distinct 5'-wide walking path, separate from the driveway private access, be installed to connect lots 4-5 and lots 6-12 to the public right of way at Strong Rd.

F. To accommodate parking in front of garages accessed from the proposed private access/~~driveway~~, planning recommends as a condition of approval that garage setbacks are met from the driveway private access tract line.

G. The parent site as a whole shall meet all applicable development standards with respect to its surroundings, including but not limited to: Setbacks; Building coverage; Design standards; Street frontage; and Density.

H. Lots created through a Unit Lot Subdivision shall be subject to all applicable requirements of Title 17 SMC, except as otherwise modified by section 17G.080.065.

WCE Response: WCE has reviewed the above final plat comments and would accept the above conditions of approval.

Dedications and Signatures for Final Plat.

The final plat shall include the following dedications and signature/certificates:

- I. If any archaeological resources, including sites, objects, structures, artifacts, and/or implements, are discovered on the project site, all construction and/or site disturbing activities shall cease until appropriate authorities, agencies, and/or entities have been notified in accordance with Chapters 27.44 and 27.53 RCW.*
- II. Street trees and landscaping are required – compliance will be verified prior to approval of Certificate of Occupancy for each new home.*
- III. Per 17G.080.065(F) Unit Lot Subdivision Recording. The plat recorded with the county auditor's office shall include the following:*
 - a. Access easements, joint use and maintenance agreements, and covenants, conditions, and restrictions identifying the rights and responsibilities of property owners and/or the homeowners association for use and maintenance of common garage, parking and vehicle access areas; on-site recreation; landscaping; utilities; common open space; exterior building facades and roofs; and other similar features.*
 - b. A note that approval of the subdivision was granted by the review of the site as a whole (stating the subject project file number if applicable);*
 - c. A note that subsequent platting actions, additions or modifications to the structure(s) may not create or increase any nonconformity of the parent site as a whole, and shall conform to the approved site development plan;*
 - d. A note stating that if a structure or portion of a structure has been damaged or destroyed, any repair, reconstruction or replacement of the structure(s) shall conform to the approved site development plan;*
 - e. A note that additional development of the individual lots may be limited as a result of the application of development standards to the parent site.*
 - f. The legal description of each lot shall identify it as part of a unit lot subdivision.*
- IV. Surveyor's certificate, stamp, date and signature, as follows:*

The following land surveyor's certificate to be shown on each sheet of the plat: "I, _____ registered land surveyor, hereby certify the plat of, _____ as shown hereon, is based upon actual field survey of the land described and that all angles, distances, and courses are correctly shown and that all non fronting lot corners are set as shown on the plat. Monuments and fronting lot corners shall be set upon completion of the utility and street improvements.

Signed _____(Seal)"
- V. A certification by the city treasurer, as applicable:*

"I hereby certify that the land described by this plat, as of the date of this certification, is not subject to any local improvement assessments. Examined and approved, this _____ day of _____, 20__.

City of Spokane Treasurer"

- VI. The certification of the hearing examiner, on behalf of the city council, as follows:*

"This plat has been reviewed on this _____ day of _____, 20__ and is found to be in full compliance with all the conditions of approval stipulated in the Hearing Examiner's approval of preliminary plat # Z25-456PPLT.

Hearing Examiner”

VII. The certification by the planning director, as follows:

“This plat has been reviewed on this _____ day of _____, 20__ and is found to be in full compliance with all the conditions of approval stipulated in the Hearing Examiner’s/Planning Director’s approval of the preliminary plat #Z25-456PPLT.

City of Spokane Planning Director”

VIII. The certification by the city engineer, as follows:

“Approved as to compliance with the survey data, the design of public works and provisions made for constructing the improvements and permanent control monuments this _____ day of _____, 20__.

City of Spokane Engineer”

IX. The certification by the Spokane county treasurer, as follows:

“I hereby certify that the land described in this plat, as of the date of this certification, is not subject to any outstanding fees or assessments. Examined and approved _____ day of _____, 20__.

Spokane County Treasurer”

X. The certification by the Spokane county auditor on each page of the final short plat including the time, date, book and page number of the recording of the final mylar.

XI. Signature of every owner certifying that (at a minimum):

- a. the plat is made with the free consent and in accordance with the desires of the owners of the land;*
- b. the owners are the owners of the property and the only parties having interest in the land and is not encumbered by any delinquent taxes or assessments;*
- c. the owners adopt the plan of lots, blocks and streets shown;*
- d. owner dedicates to the City and the City’s permittees the easements shown for utilities and cable television purposes;*

****Engineering may request additional statements for the owner certification as needed.*

XII. Add the following dedication to the face of the final plat. Please include HOA UBI, CCR recording no, etc.

“THE OWNERS OF ALL LOTS WITHIN THIS PLAT SHALL BE MEMBERS OF THE _____ ASSOCIATION, A WASHINGTON CORPORATION CREATED ON _____, UBI NUMBER _____ SUBJECT TO THE ARTICLES AND BYLAWS THEREOF. PER DECLARATION ESTABLISHING COVENANTS, CONDITIONS, AND RESTRICTIONS UNDER AUDITOR’S FILE NUMBER _____.”

WCE Response: WCE has reviewed the above dedication signatures and will accept a condition that the required signatures be on the final plat.

*Engineering Dept.
Revisions Required.*

The following comments must be addressed prior to technical completion of the preliminary plat:

26. Please correct the legal description on the face of the plat.

WCE Response: The legal description has been corrected on the face of the plat.

27. Quarter Section Lines should be included on the face of the plat as one crosses the plat area and one is within Strong Road.

WCE Response: Quarter Section Lines are shown on the face of the plat.

28. Show the existing topography at two-foot maximum interval (SMC 17G.080.040(2)(o)).

WCE Response: The existing topography has been shown at a 1-foot interval.

29. Is the 26-foot-wide easement intended to include utilities, pedestrian and vehicle access? Please clarify.

WCE Response: The 26-foot-wide easement is intended to include vehicle access and wet utilities. There will be a 10-foot utility and pedestrian access easement on the west side of the private access, as well as on the east side of the access south of the hammerhead turnaround, and on the north side of the east-west portion of the hammerhead turnaround.

30. This plat is located within a special drainage district and an area of drainage concern. Please provide a conceptual stormwater drainage plan showing proposed locations for handling the stormwater.

WCE Response: A conceptual stormwater drainage plan is included with this updated application packet.

31. Easement 8602100237 appears to be missing from the face of the preliminary plat. Please show the easement.

WCE Response: Easement 8602100237 has been added to the preliminary plat.

32. A.F.N. 8211220211, a water service covenant, is shown on the face of the plat as if it is a 65-foot encumbrance. The water service covenant is insignificant as the area has been annexed by the city and can be shown on the face of the plat as just a reference note.

WCE Response: Easement 8211220211 has been identified as a reference note.

33. A 7.5-foot right-of-way dedication on the north side of Strong Road, adjacent to the plat, is required and must be clearly indicated and dimensioned on the preliminary plat.

WCE Response: A 7.5-foot right-of-way dedication has been added to the north side of Strong Road.

34. Please show the location of any existing onsite septic systems, including cesspools and/or drain fields, on the face of the preliminary plat.

WCE Response: Approximate onsite septic systems have been added to the preliminary plat to be closed and/or removed.

35. Per SMC 17G.080.070.B, please show an easement for dry utilities, typically a minimum of ten-feet wide adjacent to public right-of-way (e.g. Strong Road).

WCE Response: A 10-foot utility easement has been identified along Strong Road.

36. Preliminary Long Plat Application: G.6.g “Sanitary wastes” states the project proposes to connect 10 additional units to public sewer, but the plat is proposing 12 lots. Please clarify.

1. This section also mentions a “private alley”. Please revise to “private access”.

WCE Response: The application was updated to identify 12 connections to public sewer. Additionally, all references to private alley have been replaced with private access.

37. TDGL, page 1 of 15, the statement “Lots 2, 3 and 4 front the proposed east-west road. Lot 1 and lots 5 through 11 front the proposed north-south road” does not match the plat map provided and excludes mention of Lot 12. Please clarify.

WCE Response: The trip generation letter has been updated to correctly identify the proposed accesses to the public street network via the new private access.

38. There are some unlabeled lines shown on the face of the plat. See snip below. Please clarify.

WCE Response: The unlabeled lines have been removed from the preliminary plat.

General Comments and Conditions:

WCE Response: WCE has no concern with the majority of the comments identified in this section, with the exception of those below:

T. Public streets, including paving, curb, gutter, sidewalk, signs, stormwater drainage structures/facilities, and swales / planting strips necessary to serve the proposed plat, shall be designed and constructed in accordance with city standards. Sidewalks shall serve each lot and provide access to a public street.

WCE Response: Sidewalk is required along Strong Road; however, per code, sidewalk is not required on the interior of the unit-lot subdivision. A paved pedestrian pathway will be provided for internal connectivity and for connectivity to the public sidewalk system.

Y. Deviations from city design standards must be submitted in writing to the city engineer and approved prior to the submittal of engineering plans for review (SMC 17H.010.020).

WCE Response: Sidewalk is required along Strong Road; however, per code, sidewalk is not required on the interior of the unit-lot subdivision. A paved pedestrian pathway will be provided for internal connectivity and for connectivity to the public sidewalk system.

*WA Dept of Archeology and Historic Preservation (DAHP)
Conditional Approval.*

Per the attached email from James MacNaughton, Local Government Archaeologist, dated August 8, 2025, the following conditions of approval apply:

AA. A Cultural Resources Survey prior to ground disturbing activity.

WCE Response: Per the comment letter from the Spokane Tribe of Indians, the area has been extensively developed in surrounding areas and the Tribe is not requesting a CRS at this time. We would ask that the DAHP condition be modified to match the requirement for an Inadvertent Discovery Plan.

If you have any questions or comments regarding this letter, please feel free to contact us at (509) 893-2617

Thank you,

A handwritten signature in blue ink that reads "Austin J. Fuller". The signature is fluid and cursive, with a long horizontal line extending from the end.

Austin J. Fuller, AICP
Whipple Consulting Engineers, Inc.

TRW/ajf

Enclosures: as noted

Cc: File, Owner