

November 11, 2025
Whipple Consulting Engineering, Inc.
C/O Austin Fuller & Todd Whipple
21 S Pines Rd.
Spokane Valley, WA 99206

RE: Review of File # Z25-456PPLT

Dear Mr. Fuller and Mr. Whipple:

After review of the above-described application, it has been determined to be technically complete according to Spokane Municipal Code (SMC) 17G.061.120, Determination of a Complete Application.

The below detail is a compilation of applicable conditions and general comments received during the agency review process. Please also note that any modified conditions and/or dedications requested have been highlighted in **yellow**, so they stand out.

Planning Department (incorporated into this letter, no separate memo):
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.

- A. 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.
- B. 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.
- C. 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 private access, be installed to connect lots 4-5 and lots 6-12 to the public right of way at Strong Rd.
- D. To accommodate parking in front of garages accessed from the proposed private access, planning recommends as a condition of approval that garage setbacks are met from the private access_{tact} line.
- E. 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.
- F. 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.

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):
- the plat is made with the free consent and in accordance with the desires of the owners of the land;
 - 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;
 - the owners adopt the plan of lots, blocks and streets shown;
 - 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 _____."

Engineering Dept.

General Comments and Conditions:

- A detailed drainage report, including a geotechnical site characterization will be required with the engineering submittal for the plat.
- The City Engineer is authorizing twelve living units to be served by private access from Strong Road.
- The existing buildings require a demolition permit. Please note that a geotechnical evaluation may be required prior to new structures being constructed in the footprint of the razed structures.
- There is an existing septic system onsite that shall be abandoned per the guidelines set forth by Spokane Regional Health District (SRHD). Please provide verification from SRHD of abandonment. Please note that a geotechnical evaluation may be required prior to new structures being constructed in the footprint of the septic system.
- Frontage improvements are required along Strong Road to match the improvements done for the development, Forest Grove Subdivision, west of this plat. Curb, separated sidewalk with street trees, full pavement section from centerline of Strong Road to the north, and stormwater design for street runoff and treatment are required. A city standard concrete approach will be required for the private access.
 - These improvements must be completed and accepted, or bonded for, prior to this plat being finalized.

- F. Strong Road, located adjacent to but outside the proposed plat boundary, is under a pavement cut moratorium until September 14, 2026.
- G. A Homeowner's Association (HOA), or other similar entity, is required to be established for operation and maintenance of the shared access easements, joint use and maintenance, stormwater facilities, private water, and private sewer. See [SMC 17G.080.065](#) and [SMC 17H.010.090\(H\)](#) for additional information.
- a. Please include a draft of the Covenants, Conditions, and Restrictions (CCRs) with the final plat submittal for review and concurrence from the Development Services Center.
- H. Per [SMC 17H.010.090\(F\)](#), private access shall be improved in accordance with the development standards for parking lots as provided in [SMC 17C.230.140](#). ~~The pavement section shall meet City Design Standards for residential development to be designed by the Project Engineer (minimum 3 inches of HMA over 4 inches of crushed surfacing).~~
- I. The nearest available public water service mains which could provide service to this proposed plat are an eighteen-inch ductile iron main located in Strong Road. Existing water pressure is approximately 63 psi at a nearby hydrant on the south side of Strong Road.
- a. The proposed unit lot subdivision will need to be served by a master water meter and a private water system behind the master water meter. This will require a Homeowners Association or similar entity for billing, maintenance, repair, and replacement of the private water system.
 - b. The developer is responsible for all costs associated with design and construction of water improvements necessary to serve the proposed plat.
 - c. The water system shall be designed and constructed in accordance with city standards. A pressure of 45 psi minimum at the property line is required for service connections supplying domestic flows. Pressures shall not drop below 20 psi at any point in the system during a fire situation. Pressures over 80 psi will require pressure reducing valves be installed at developer expense.
- J. The nearest existing public sanitary sewer mains which could provide service to this proposed plat are an eight-inch PVC capped stub extending east from the manhole in the intersection of Strong Road and Hazelnut Street as well as an eight-inch PVC capped stubbing extending west from the manhole in the intersection of Strong Road and Cannon Street.
- a. A sewer main extension will be required prior to final plat.
 - b. The developer is responsible for all costs associated with design and construction of sanitary sewer improvements necessary to serve the proposed plat.
 - c. The sanitary sewer system shall be designed and constructed in accordance with city standards.
 - d. Construction plans shall be submitted to Development Services for review and acceptance. The sanitary sewer system, including individual service connections to each lot, shall be constructed and accepted for service prior to the city engineer signing the final plat.

- K. In accordance with the City's Financial Guarantee Policy, a financial guarantee will be required for all street, drainage, and erosion / sediment control improvements not constructed prior to the approval of the final plat. Water and sewer improvements cannot be bonded for.
- L. All water and sewer service connections must front the lot they are to serve. Offset connections will not be allowed.
- M. All stormwater and surface drainage generated onsite shall be disposed of onsite in accordance with SMC 17D.060 "Stormwater Facilities", the Spokane Regional Stormwater Manual, Special Drainage Districts, City Design Standards, and per the Project Engineer's recommendations, based on the drainage plan accepted for the final plat.
- a. Prior to construction, a grading and drainage plan shall be submitted to Development Services for review and acceptance.
 - b. The project is located within the Five Mile Special Drainage District. A down-gradient analysis demonstrating that there will be no expected adverse impacts on down-gradient properties will be required. Additional information on special drainage districts can be found in [SMC 17D.060 "Storm Water Facilities"](#).
 - c. An erosion / sediment control plan, detailing how dust and runoff will be handled during and after construction, shall be submitted to Development Services for review and acceptance prior to construction.
 - d. If drywells are utilized, they shall be tested to ensure design infiltration rates are met. A minimum factor of safety of 2 (two) will be required. In accordance with State Law, existing and proposed Underground Injection Control structures need to be registered with the Washington State Department of Ecology. Proof of registration must be provided prior to plan acceptance.
 - e. The developer is responsible for all construction costs associated with constructing stormwater improvements necessary to serve the proposed plat.
- N. 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.
- a. The developer is responsible for all costs associated with constructing street improvements necessary to serve the proposed plat.
 - b. Construction plans for streets must be designed by a Professional Engineer, licensed in the State of Washington, and submitted to Development Services for review and acceptance prior to construction.
 - c. Signing and striping plans, where appropriate, shall be included as part of the design submittal. Landscaping plans for the public right-of-way should also be included as part of the submittal to ensure clear view triangles are met and that there are no conflicts between signage and street trees.
 - d. Street design for the plat shall include supporting geotechnical information on the adequacy of the soils underneath to support vehicular design loads.
 - e. All street identification and traffic control signs required due to this project must be installed by the developer at the time street improvements are being constructed. They shall be installed and inspected to the satisfaction of the

City's Construction Management Office in accordance with city standards prior to the occupancy of any structures within the plat.

- O. Plan review fees for sanitary sewer, water, street, and stormwater improvements will be determined at the time of plan submittal and must be paid prior to the start of the review.
- P. Centerline monuments must be installed in accordance with [City of Spokane Design Standards](#). If street improvements are bonded for in order to record the final plat early, a \$250.00 deposit will be required for each monument.
- Q. Addresses shall be shown on the face of the final plat. Addresses will be required prior to applying for any water and/or sewer tap permits. Fees shall be assessed for all new addresses (M. Owen note: 11 new address fees were assessed under the preliminary plat application).
- R. Lot plans, stamped and signed by a Professional Engineer, shall be prepared for residential lots as per the criteria listed in Appendix 3C of the Spokane Regional Stormwater Manual and submitted to the City of Spokane for review and acceptance prior to the final plat being accepted by the City of Spokane.
- S. 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).

The following statements are required in the dedication of Final Plat:

- I. Slope easements for cut and fill, as deemed necessary by the Development Services Center in accordance with the City's Design Standards, are hereby granted to the City of Spokane for the construction and maintenance of public streets adjoining this plat.
- II. A ten-foot easement for utilities, including cable television, is hereby granted along all public street frontages to the City and its permittees for the construction, reconstruction, maintenance and operation of utilities and cable television, together with the right to inspect said utilities and to trim and/or remove brush and trees which may interfere with the construction, maintenance and operation of the same.
- III. Development of the subject property, including grading and filling, are required to follow an erosion/sediment control plan that has been submitted to and accepted by Development Services prior to the issuance of any building and/or grading permits.
- IV. All stormwater and surface drainage generated on-site must be disposed on-site in accordance with Chapter 17D.060 SMC, Stormwater Facilities, the Spokane Regional Stormwater Manual, and City Design Standards, and as per the Project Engineer's recommendations, based on the drainage plan accepted for the final plat.
- V. This plat is in the Five Mile Special Drainage District as defined by SMC 17D.060.130, basements are **not** recommended. The development of any below grade structures (including basements) in the plat is subject to review of a geotechnical evaluation for foundation design to determine suitability and affects from stormwater and/or subsurface runoff. The geotechnical evaluation is required to be performed for each lot with below grade level structures and submitted for review and concurrence to the City of Spokane Building Department and Development Services prior to issuance of a building permit. An overall geotechnical analysis may be performed in lieu of individual lot analyses to determine appropriate construction designs. Development of the plat is subject to the provisions of chapters 17D.060 and 17F.100.090 SMC.

- VI. No building permit shall be issued for any lot in this subdivision until evidence satisfactory to the Development Services Center has been provided showing that the recommendations of Chapter 17D.060 SMC, Stormwater Facilities, the Spokane Regional Stormwater Manual, and the Project Engineer's recommendations, based on the drainage plan accepted for the final subdivision, have been complied with.
- VII. Prior to the issuance of any building permits, the lots shall be connected to a functioning public or private sanitary sewer system complying with the requirements of the Development Services Center.
- VIII. Only City water and sanitary sewer systems shall serve the plat; the use of individual on-site sanitary waste disposal systems and private wells is prohibited.
- IX. All required improvements serving the plat, including streets, sanitary sewer, stormwater, and water, shall be designed and constructed at the developer's expense. The improvements must be constructed to City Standards by the developer prior to occupancy of any structures within the development.
- X. Prior to the issuance of any building permits, the lots shall be connected to a functioning public or private water system complying with the requirements of the Development Services Center and having adequate pressure for domestic and fire uses, as determined by the Water and Hydroelectric Services Department.
- XI. Prior to the issuance of any building permits, the lots shall be served by fire hydrants and shall have appropriate access to streets as determined by the requirements of the City Fire Department and the Development Services Center.
- XII. Water mains and fire hydrants must be installed at the developer's expense, in locations approved by the City Fire Department and in accordance with applicable State and Federal provisions.
- XIII. All street identification and traffic control signs required by this project will be the responsibility of the developer.
- XIV. With respect to any increased stormwater flows accruing as a result of any development, each property owner, on its own behalf and the behalf of its successors in interest, fully accepts without reservation, the obligation to obstruct and artificially contain and collect all natural or artificially generated or enhanced drainage flows across or upon said owner's property. The purpose of this requirement is to avoid causing or potentially contributing to flooding, erosion, or stormwater loads on other private or public properties and the public sewer system.
- XV. Property owners will maintain drainage swales and/or planting strips in public right-of-way adjacent to their property with a permanent live cover of lawn turf, with optional shrubbery and/or trees which do not obstruct the flow and percolation of runoff in the drainage swale, as indicated on the accepted plans.

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.

Engineering design standards identified by Dave Kokot are located at the link below (please also see general comments/conditions from engineering regarding required private access improvements including pavement section):

<https://static.spokanecity.org/documents/business/designstandards/2025/standard-plans-section-w-2025-06-03.pdf>.

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.

City Treasurer

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

Spokane Tribe of Indians

Conditional Approval.

Per the attached email from Randy Abrahamson, Spokane Tribe of Indians Tribal Historic Preservation Officer, dated July 29, 2025, the following conditions of approval were identified in the letter.

- T. An Inadvertent Discovery Plan implemented into the scope of work and on-site during all ground disturbing activities.

WA Dept of Archeology and Historic Preservation (DAHP)

Conditional Approval.

Per the attached follow-up email from James MacNaughton, Local Government Archaeologist, dated October 14, 2025, the following modified conditions of approval apply:

- U. ~~A Cultural Resources Survey prior to ground disturbing activity.~~ Incorporation of a robust IDP for the project, so long as it stays with the project leads at all times, all crew are briefed on what to do and who to call in the event of a discovery, and what archaeology might look like in the ground.

WA Dept. of Fish and Wildlife (DFW)

Per email from Kile Westerman, Habitat Biologist, August 13, 2025, there are no concerns regarding this proposal.

Considering the need for additional information, the timeline for this application is on hold until the additional information is provided. In accordance with SMC 17G.061.120, the required information must be provided within sixty days from the notification by the department. The applicant may submit a written request for additional time to the director, any time extensions shall be in writing. If the information is not received within 60 days the application and a portion of the fees shall be returned to the applicant in accordance with SMC 08.02.0692.

If you have any questions regarding these requirements, feel free to contact me by email or phone. Please make an appointment with me to submit the revised and additional materials.

Sincerely,



Melissa Owen
Assistant Planner

Development Services Center

Attachments:

City of Spokane Dept. Review.

Planning Comments incorporated into this memo

Engineering Memo – Revised Engineering Memo received 10/16/25; and,
follow-up email from Mike Nilsson 11/10/25

WA Dept. of Archeology and Historic Preservation, follow-up email 10/14/25, 2025

All other original communications included in request for additional information letter.

From: [Eliason, Joelie](#)
To: [Owen, Melissa](#)
Subject: RE: Z25-456PPLT Strong Road Residential Development
Date: Wednesday, October 15, 2025 4:24:12 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[Z25-456PPLT Strong Rd Res Dev Review02.docx](#)

Melissa,

My first comment has been revised also as:

1. This plat is located within a special drainage district and an area of drainage concern. Please provide a conceptual stormwater drainage report, as per SRSM section 3.3, and a conceptual drainage plan showing proposed handling of stormwater. The “preliminary long plat storm eval” provided does not provide enough information.

The first deletion is correct as I believe it will allow for a more flexible design (e.g. concrete instead of asphalt).

The 2nd deletion appears to be a mistake. I’ve added it back in & attached the revised comments.

Thanks for checking!



Joelie Eliason | City of Spokane | Engineering Technician IV Development Services Center

509.625-6385 | 808 W Spokane Falls Blvd, Spokane, WA 99201 | jeliason@spokanecity.org | my.spokanecity.org



DSC is open Mon-Tues & Thur-Fri 8 am–5 pm & Wed 11 am-5 pm in person, [online](#) or over the phone at 509.625.6300!

Notice: Staff availability will be limited October 20th–24th while we complete new permit system training. Thank you for your patience as we prepare to serve you better!

From: Owen, Melissa <mowen@spokanecity.org>
Sent: Wednesday, October 15, 2025 3:28 PM
To: Eliason, Joelie <jeliason@spokanecity.org>
Subject: RE: Z25-456PPLT Strong Road Residential Development

Joelie,

I typically like to point out changes to the applicant from the prior letter. This is what I’ve marked as the changes after reviewing the original memo and this new memo. Does the below look right?

New comment

- A. The City Engineer is authorizing twelve living units to be served by private access from Strong Road.

Revised Comment

- A. Per [SMC 17H.010.090\(F\)](#), private access shall be improved in accordance with the development standards for parking lots as provided in [SMC 17C.230.140](#). ~~The pavement section shall meet City Design Standards for residential development to be designed by the Project Engineer (minimum 3 inches of HMA over 4 inches of crushed surfacing).~~
- B. All stormwater and surface drainage generated onsite shall be disposed of onsite in accordance with SMC 17D.060 "Stormwater Facilities", the Spokane Regional Stormwater Manual, Special Drainage Districts, City Design Standards, and per the Project Engineer's recommendations, based on the drainage plan accepted for the final plat.
- a. Prior to construction, a grading and drainage plan shall be submitted to Development Services for review and acceptance.
 - b. ~~The project is located within the Five Mile Special Drainage District. A down-gradient analysis demonstrating that there will be no expected adverse impacts on down-gradient properties will be required. Additional information on special drainage districts can be found in [SMC 17D.060 "Storm Water Facilities"](#)~~
 - c. An erosion / sediment control plan, detailing how dust and runoff will be handled during and after construction, shall be submitted to Development Services for review and acceptance prior to construction.
 - d. If drywells are utilized, they shall be tested to ensure design infiltration rates are met. A minimum factor of safety of 2 (two) will be required. In accordance with State Law, existing and proposed Underground Injection Control structures need to be registered with the Washington State Department of Ecology. Proof of registration must be provided prior to plan acceptance.
 - e. The developer is responsible for all construction costs associated with constructing stormwater improvements necessary to serve the proposed plat.

Thanks.

⚠️ October 20th–24th: Staff availability will be limited due to new permit system training. Please expect longer response times. We appreciate your understanding and thank you for your patience.

Development Services Center is open Monday, Tuesday, Thursday, and Friday 8 am – 5 pm in person (11 am – 5 pm each Wednesday), [online](#) or over the phone at 509.625.6300!



Melissa Owen | City of Spokane | Planning & Development Services
509.625.6063 | mowen@spokanecity.org



From: Eliason, Joelle <jeliason@spokanecity.org>
Sent: Wednesday, October 15, 2025 9:56 AM
To: Owen, Melissa <mowen@spokanecity.org>
Cc: Brown, Eldon <ebrown@spokanecity.org>; Palmquist, Tami <tpalmquist@spokanecity.org>; Nilsson, Mike <mnilsson@spokanecity.org>; Hayden, Adam <ahayden@spokanecity.org>; Kuhn, Dalton <dkuhn@spokanecity.org>; Johnson, Erik D. <edjohnson@spokanecity.org>; Taylor, Joel <jtaylor@spokanecity.org>
Subject: Z25-456PPLT Strong Road Residential Development

Melissa,

Please see the attached comments for the 2nd review of Z25-456PPLT. Let me know if you have any questions.

Thank you,



Joelle Eliason | City of Spokane | Engineering Technician IV Development Services Center
509.625-6385 | 808 W Spokane Falls Blvd, Spokane, WA 99201 | jeliason@spokanecity.org | my.spokanecity.org



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MEMORANDUM



Development Services Center

DATE: October 15, 2025
TO: Melissa Owen, Planner II
FROM: Joeline Eliason, Engineering Technician IV – Development Services
THROUGH: Eldon Brown, P.E., Principal Engineer – Development Services
FILE NO: Z25-456PPLT
SUBJECT: Strong Road Residential Development Preliminary Long Plat – 2nd Review

PLAT COMMENTS

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

- ~~1. This plat is located within a special drainage district and an area of drainage concern. Please provide a conceptual stormwater drainage report, as per SRS section 3.3, and a conceptual drainage plan showing proposed handling of stormwater. The “preliminary long plat storm eval” provided does not provide enough information.~~

See revised
comment/condition
in email from Mike
Nilsson
11/10/25

General Comments:

1. The City Engineer is authorizing twelve living units to be served by private access from Strong Road.
2. The existing buildings require a demolition permit. Please note that a geotechnical evaluation may be required prior to new structures being constructed in the footprint of the razed structures.
3. There is an existing septic system onsite that shall be abandoned per the guidelines set forth by Spokane Regional Health District (SRHD). Please provide verification from SRHD of abandonment. Please note that a geotechnical evaluation may be required prior to new structures being constructed in the footprint of the septic system.
4. Frontage improvements are required along Strong Road to match the improvements done for the development, Forest Grove Subdivision, west of this plat. Curb, separated sidewalk with street trees, full pavement section from centerline of Strong Road to the north, and stormwater design for street runoff and treatment are required. A city standard concrete approach will be required for the private access.

Date: October 15, 2025

Comments: Strong Road Residential Development

(Continuation)

- a. These improvements must be completed and accepted, or bonded for, prior to this plat being finalized.
5. Strong Road, located adjacent to but outside the proposed plat boundary, is under a pavement cut moratorium until September 14, 2026.
6. A Homeowner's Association (HOA), or other similar entity, is required to be established for operation and maintenance of the shared access easements, joint use and maintenance, stormwater facilities, private water, and private sewer. See [SMC 17G.080.065](#) and [SMC 17H.010.090\(H\)](#) for additional information.
 - a. Please include a draft of the Covenants, Conditions, and Restrictions (CCRs) with the final plat submittal for review and concurrence from the Development Services Center.
7. Per [SMC 17H.010.090\(F\)](#), private access shall be improved in accordance with the development standards for parking lots as provided in [SMC 17C.230.140](#).
8. The nearest available public water service mains which could provide service to this proposed plat are an eighteen-inch ductile iron main located in Strong Road. Existing water pressure is approximately 63 psi at a nearby hydrant on the south side of Strong Road.
 - a. The proposed unit lot subdivision will need to be served by a master water meter and a private water system behind the master water meter. This will require a Homeowners Association or similar entity for billing, maintenance, repair, and replacement of the private water system.
 - b. The developer is responsible for all costs associated with design and construction of water improvements necessary to serve the proposed plat.
 - c. The water system shall be designed and constructed in accordance with city standards. A pressure of 45 psi minimum at the property line is required for service connections supplying domestic flows. Pressures shall not drop below 20 psi at any point in the system during a fire situation. Pressures over 80 psi will require pressure reducing valves to be installed at developer expense.
9. The nearest existing public sanitary sewer mains which could provide service to this proposed plat are an eight-inch PVC capped stub extending east from the manhole in the intersection of Strong Road and Hazelnut Street as well as an eight-inch PVC capped stubbing extending west from the manhole in the intersection of Strong Road and Cannon Street.
 - a. A sewer main extension will be required prior to final plat.
 - b. The developer is responsible for all costs associated with design and construction of sanitary sewer improvements necessary to serve the proposed plat.
 - c. The sanitary sewer system shall be designed and constructed in accordance with city standards.

Date: October 15, 2025

Comments: Strong Road Residential Development

(Continuation)

- d. Construction plans shall be submitted to Development Services for review and acceptance. The sanitary sewer system, including individual service connections to each lot, shall be constructed and accepted for service prior to the city engineer signing the final plat.
10. In accordance with the City's Financial Guarantee Policy, a financial guarantee will be required for all street, drainage, and erosion / sediment control improvements not constructed prior to the approval of the final plat. Water and sewer improvements cannot be bonded for.
11. All water service and sewer service connections must front the lot they are to serve. Offset connections will not be allowed.
12. All stormwater and surface drainage generated onsite shall be disposed of onsite in accordance with SMC 17D.060 "Stormwater Facilities", the Spokane Regional Stormwater Manual, Special Drainage Districts, City Design Standards, and per the Project Engineer's recommendations, based on the drainage plan accepted for the final plat.
- a. Prior to construction, a grading and drainage plan and a drainage report shall be submitted to Development Services for review and acceptance.
 - b. The project is located within the Five Mile Special Drainage District. A down-gradient analysis demonstrating that there will be no expected adverse impacts on down-gradient properties will be required. Additional information on special drainage districts can be found in [SMC 17D.060 "Storm Water Facilities"](#).
 - c. An erosion / sediment control plan, detailing how dust and runoff will be handled during and after construction, shall be submitted to Development Services for review and acceptance prior to construction.
 - d. If drywells are utilized, they shall be tested to ensure design infiltration rates are met. A minimum factor of safety of 2 (two) will be required. In accordance with State Law, existing and proposed Underground Injection Control structures need to be registered with the Washington State Department of Ecology. Proof of registration must be provided prior to plan acceptance.
 - e. The developer is responsible for all construction costs associated with constructing stormwater improvements necessary to serve the proposed plat.
13. 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, or an equivalent pedestrian path, shall serve each lot and provide access to a public street.
- a. The developer is responsible for all costs associated with constructing street improvements necessary to serve the proposed plat.

Date: October 15, 2025

Comments: Strong Road Residential Development

(Continuation)

- b. Construction plans for streets must be designed by a Professional Engineer, licensed in the State of Washington, and submitted to Development Services for review and acceptance prior to construction.
 - c. Signing and striping plans, where appropriate, shall be included as part of the design submittal. Landscaping plans for the public right-of-way should also be included as part of the submittal to ensure clear view triangles are met and that there are no conflicts between signage and street trees.
 - d. Street design for the plat shall include supporting geotechnical information on the adequacy of the soils underneath to support vehicular design loads.
 - e. All street identification and traffic control signs required due to this project must be installed by the developer at the time of street improvements being constructed. They shall be installed and inspected to the satisfaction of the City's Construction Management Office in accordance with city standards prior to the occupancy of any structures within the plat.
14. Plan review fees for sanitary sewer, water, street, and stormwater improvements will be determined at the time of plan submittal and must be paid prior to the start of the review.
15. Centerline monuments must be installed in accordance with [City of Spokane Design Standards](#). If street improvements are bonded for in order to record the final plat early, a \$250.00 deposit will be required for each monument.
16. Addresses shall be shown on the face of the final plat. Addresses will be required prior to applying for any water and/or sewer tap permits. Fees shall be assessed for all new addresses.
17. Lot plans, stamped and signed by a Professional Engineer, shall be prepared for residential lots as per the criteria listed in Appendix 3C of the Spokane Regional Stormwater Manual and submitted to the City of Spokane for review and acceptance prior to the final plat being accepted by the City of Spokane.
18. 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).

The following statements are required in the dedication of Final Plat:

- 1. Slope easements for cut and fill, as deemed necessary by the Development Services Center in accordance with the City's Design Standards, are hereby granted to the City of Spokane for the construction and maintenance of public streets adjoining this plat.
- 2. A ten-foot easement for utilities, including cable television, is hereby granted along all street frontages to the City and its permittees for the construction, reconstruction, maintenance and operation of utilities and cable television, together with the right to inspect said utilities and to trim and/or remove brush and trees which may interfere with the construction, maintenance and operation of the same.

Date: October 15, 2025

Comments: Strong Road Residential Development

(Continuation)

3. Development of the subject property, including grading and filling, are required to follow an erosion/sediment control plan that has been submitted to and accepted by Development Services prior to the issuance of any building and/or grading permits.
4. All stormwater and surface drainage generated on-site must be disposed on-site in accordance with Chapter 17D.060 SMC, Stormwater Facilities, the Spokane Regional Stormwater Manual, and City Design Standards, and as per the Project Engineer's recommendations, based on the drainage plan accepted for the final plat.
5. This plat is in the Five Mile Special Drainage District as defined by SMC 17D.060.130, basements are **not** recommended. The development of any below grade structures (including basements) in the plat is subject to review of a geotechnical evaluation for foundation design to determine suitability and affects from stormwater and/or subsurface runoff. The geotechnical evaluation is required to be performed for each lot with below grade level structures and submitted for review and concurrence to the City of Spokane Building Department and Development Services prior to issuance of a building permit. An overall geotechnical analysis may be performed in lieu of individual lot analyses to determine appropriate construction designs. Development of the plat is subject to the provisions of chapters 17D.060 and 17F.100.090 SMC.
6. No building permit shall be issued for any lot in this subdivision until evidence satisfactory to the Development Services Center has been provided showing that the recommendations of Chapter 17D.060 SMC, Stormwater Facilities, the Spokane Regional Stormwater Manual, and the Project Engineer's recommendations, based on the drainage plan accepted for the final subdivision, have been complied with.
7. Prior to the issuance of any building permits, the lots shall be connected to a functioning public or private sanitary sewer system complying with the requirements of the Development Services Center.
8. Only City water and sanitary sewer systems shall serve the plat; the use of individual on-site sanitary waste disposal systems and private wells is prohibited.
9. All required improvements serving the plat, including streets, sanitary sewer, stormwater, and water, shall be designed and constructed at the developer's expense. The improvements must be constructed to City Standards by the developer prior to occupancy of any structures within the development.
10. Prior to the issuance of any building permits, the lots shall be connected to a functioning public or private water system complying with the requirements of the Development Services Center and having adequate pressure for domestic and fire uses, as determined by the Water and Hydroelectric Services Department.
11. Prior to the issuance of any building permits, the lots shall be served by fire hydrants and shall have appropriate access to streets as determined by the requirements of the City Fire Department and the Development Services Center.
12. Water mains and fire hydrants must be installed at the developer's expense, in locations approved by the City Fire Department and in accordance with applicable State and Federal provisions.

Date: October 15, 2025

Comments: Strong Road Residential Development

(Continuation)

13. All street identification and traffic control signs required by this project will be the responsibility of the developer.
14. With respect to any increased stormwater flows accruing as a result of any development, each property owner, on its own behalf and the behalf of its successors in interest, fully accepts without reservation, the obligation to obstruct and artificially contain and collect all natural or artificially generated or enhanced drainage flows across or upon said owner's property. The purpose of this requirement is to avoid causing or potentially contributing to flooding, erosion, or stormwater loads on other private or public properties and the public sewer system.
15. Property owners will maintain drainage swales and/or planting strips in public right-of-way adjacent to their property with a permanent live cover of lawn turf, with optional shrubbery and/or trees which do not obstruct the flow and percolation of runoff in the drainage swale, as indicated on the accepted plans.

CC: Development Services File

Tami Palmquist, Director, Development Services Center

Mike Nilsson, P.E., Principal Engineer, Development Services Center

Adam Hayden, E.I.T., Associate Traffic Engineer, Development Services Center

Dalton Kuhn, P.E., Associate Engineer, Development Services Center

Erik Johnson, Engineering Tech IV, Development Services Center

Joel Taylor, E.I.T., Associate Engineer, Development Services Center

From: [Nilsson, Mike](#)
To: [Owen, Melissa](#)
Subject: RE: Strong Rd Plat Z25-456PPLT - stormwater drainage report review
Date: Monday, November 10, 2025 3:30:07 PM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

The concept drainage plan is adequate to address the comment below. A detailed drainage report, including a geotechnical site characterization will be required with the engineering submittal for the plat.

From: Owen, Melissa <mowen@spokanecity.org>
Sent: Monday, November 10, 2025 2:08 PM
To: Nilsson, Mike <mnilsson@spokanecity.org>
Subject: Strong Rd Plat Z25-456PPLT - stormwater drainage report review

Mike,

I've been waiting for an evaluation of a stormwater drainage report for Z25-456PPLT – Strong Road Preliminary Long Plat. This is the Unit lot Subdivision plat up at 2120 W Strong Rd. It's been a few weeks since this came in and Joeline has not yet had a chance to review. It the last item on the list before we can deem this technically complete and move this onto notice of application and hearing.

Here is the comment that is intended to be addressed

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

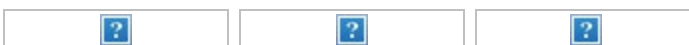
1. This plat is located within a special drainage district and an area of drainage concern. Please provide a conceptual stormwater drainage report, as per SRSB section 3.3, and a conceptual drainage plan showing proposed handling of stormwater. The “preliminary long plat storm eval” provided does not provide enough information.

Thank you.

Development Services Center is open Monday, Tuesday, Thursday, and Friday 8 am – 5 pm in person (11 am – 5 pm each Wednesday), [online](#) or over the phone at 509.625.6300!



Melissa Owen | City of Spokane | Planning & Development Services
509.625.6063 | mowen@spokanecity.org



From: [MacNaughton, James \(DAHP\)](#)
To: [Owen, Melissa](#)
Subject: RE: 2nd Request for Comments - Z25-456PPLT - Strong Road Res. Development Preliminary Long Plat (Unit Lot Subdivision) - Comments due October 15
Date: Monday, October 6, 2025 12:54:44 PM
Attachments: [image006.png](#)
[image007.png](#)
[image008.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Good Afternoon Melissa

I had to really dig to find the email in question. Since the window of comment had passed, I didn't update the project with an official request for survey, and I didn't hear back from you, so I figured it was academic.

But, to address the applicant's point that the land has been heavily disturbed and developed "for many years," RCW 27.53 makes it very clear that it does not matter if an artifact, feature or site has lies under a development built in the 1940s, those artifacts, features, and sites are protected by state law. And further, knowingly damaging, moving, or otherwise affecting a site is in violation of the law, and judges have recently been willing to affirm "willful and knowing" damage to sites, deciding against developers.

My decision was based on information provided to DAHP at the time of application, professional knowledge, and consultation with DAHP's risk assessment model. Our role at DAHP is as an advisory agency intended to keep projects moving forward, working with our agency and Tribal partners, while protecting archaeology for all Washingtonians.

Since the Affected Tribes have no specific concerns with the project, DAHP concurs with their decision to allow the project to move forward following an IDP.


Please note that the WA Dept of Ecology has recently updated their SEPA policies and procedures, giving greater authority to archaeological and historical consideration during the SEPA process. That document can be found here:
<https://apps.ecology.wa.gov/publications/SummaryPages/2506009.html>

Please also note that DAHP is developing a much more robust IDP that we will be rolling out soon that we hope will be clearer and easier to follow, while ensuring closer adherence to Washington State Law.

If you have any questions about this decision, please feel free to reach out to me.

All Best

James

	James MacNaughton, MSc, RPA (<u>He/Him</u>) Local Government Archaeologist Email: James.MacNaughton@dahp.wa.gov Mobile: (360) 280-7563 Main Office: (360) 586-3065 Hours: 7AM - 3:30PM Monday to Friday Physical Address: 1110 Capitol Way South Suite 30, Olympia, WA 98501 Mailing Address: PO Box 48343, Olympia, WA 98504-8343 www.dahp.wa.gov
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From:
Owen,
Melissa

<mowen@spokanecity.org>

Sent: Wednesday, October 1, 2025 10:43 AM

To: Eliason, Joelle <jeliason@spokanecity.org>; MacNaughton, James (DAHP)

<james.macnaughton@dahp.wa.gov>; DAHP SEPA <sepa@dahp.wa.gov>

Cc: Nilsson, Mike <mnilsson@spokanecity.org>

Subject: 2nd Request for Comments - Z25-456PPLT - Strong Road Res. Development Preliminary Long Plat (Unit Lot Subdivision) - Comments due October 15

External Email

Good morning,

We are in receipt of revised materials (applicant response to initial review, and updated application materials including application, narrative, preliminary plat map, trip generation letter) for the following project:

Project Name : Strong Road Residential Development Preliminary Long Plat (Unit Lot Subdivision)

File Number : Z25-456PPLT

Site Address: 2120 W STRONG RD (parcel 26245.0054). A portion of the southwest quarter of the northeast quarter and southeast quarter of the northwest quarter of Section 24, Township 26N, Range 42 E.W.M.

James/DAHP – the applicant has requested that DAHP reconsider their request for a cultural resource survey as the Spokane Tribe only requested an IDP be implemented into the scope of work

given the surrounding development. Please let me know if you would like to change your comment or would like to retain it and/or if I should request that the applicant contact you directly to discuss. I would be happy to send you the Spokane Tribe response should this be helpful to you.

Here are the attachments as links for your review:

[01. Response to Comments.pdf](#)

[02. Updated Plat Application.pdf](#)

[03. Updated Narrative.PDF](#)

[03. Updated Preliminary Plat.pdf](#)

[05. Updated Trip Generation Letter.pdf](#)

Additional supplemental material can be found at the project website. The above linked documents will also be available on the project website shortly.

Project Webpage - <https://my.spokanecity.org/projects/strong-road-residential-development-preliminary-long-plat/>

Please direct any questions, comments, or requests for more time to Melissa Owen, Planner II at mowen@spokanecity.org by **Wednesday, October 15, 2025, at 5:00PM.**

-

Thank you.

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Melissa Owen | City of Spokane | Planning & Development Services
509.625.6063 | mowen@spokanecity.org



From: [MacNaughton, James \(DAH\)](#)
To: [Owen, Melissa](#)
Subject: RE: 2nd Request for Comments - Z25-456PPLT - Strong Road Res. Development Preliminary Long Plat (Unit Lot Subdivision) - Comments due October 15
Date: Tuesday, October 14, 2025 1:06:36 PM
Attachments: [image006.png](#)
[image007.png](#)
[image008.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)


[CAUTION - EXTERNAL EMAIL - Verify Sender]

Good Afternoon Melissa

Thank you for reaching out again about this project, I appreciate the opportunity to comment. It does say in the documentation that the project is exempt from SEPA? That and the placement of the project we are willing to accept a robust IDP for the project, so long as it stays with the project leads at all times, all crew are briefed on what to do and who to call in the event of a discovery, and what archaeology might look like in the ground.

All Best

Jaems

	<p>James MacNaughton, MSc, RPA (<i>He/Him</i>) Local Government Archaeologist Email: James.MacNaughton@dahp.wa.gov Mobile: (360) 280-7563 Main Office: (360) 586-3065 Hours: 7AM - 3:30PM Monday to Friday Physical Address: 1110 Capitol Way South Suite 30, Olympia, WA 98501 Mailing Address: PO Box 48343, Olympia, WA 98504-8343 www.dahp.wa.gov</p>
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From:
Owen,
Melissa

<mowen@spokanecity.org>

Sent: Wednesday, October 1, 2025 10:43 AM

To: Eliason, Joelle <jeliason@spokanecity.org>; MacNaughton, James (DAH)

<james.macnaughton@dahp.wa.gov>; DAHP SEPA <sepa@dahp.wa.gov>

Cc: Nilsson, Mike <mnilsson@spokanecity.org>

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-

Thank you.

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