1. List the provisions of the land use code that allows the proposal.

A. Per the City of Spokane Zoning map, the subject parcel is in the R1 Zone.
B. According to Spokane Municipal Code Section 17C.111.030- Characteristics of Residential Zones, the R1 zone is a low-intensity residential zone built at the general scale and height of detached houses. It allows a minimum of four and a maximum of ten dwelling units per acre. The R1 zone is applied to areas that are designated Residential Low on the land use plan map of the Comprehensive Plan.
C. Section 17C.111.115 states the following uses are allowed: single-unit residential building, middle housing, accessory dwelling units, manufactured homes and multi-unit residential buildings.
D. Section 17C.111.205 Development Standard Tables 17C.205-1 through 3 will be met, including density, lot frontage and lot setbacks.
E. The remaining portions of Section 17C.111 are or will be met as appropriate.

2. Please explain how the proposal is consistent with the comprehensive plan designation and goals, objectives and policies for the property.

LU 1 –Citywide Land Use

- **The Citywide Land Use Goal promotes the development of undeveloped or under-developed lands with additional housing opportunities to all elements of the city. While developing the property, the owner will set aside steep or natural slopes and utilize the built environment to avoid placing undue burden on city or urban services that has not been previously considered. Any additional impacts will be mitigated or avoided as required by city, state or federal code.**
- **This development as proposed will implement the following policy:**
- *LU 1.3 Lower Intensity Residential Areas*
    - **This project does not propose direct access to high-intensity land uses and is located away from designated Centers and Corridors. The closest Center or Corridor is the Downtown South zone located approximately 1.39 linear miles to the northeast.**

LU 3 – Efficient Land Use

- **We believe that the proposed long plat will continue to promote the efficient use of land by placing these lots adjacent to existing development and public services. This development as proposed will implement the following policies:**
- *LU 3.1 Coordinated and efficient land use*
    - **This project is located along Thorpe Road, where existing services and facilities are in place that can be feasibly extended into the development. The project will create one public east-west road and one public north-south stub.**
- *LU 3.7 Maximum and minimum lot sizes*
    - **This project as proposed will follow maximum and minimum lot size standards. Per SMC Table 17C.111.205-1, minimum lot sizes the R1 zone are 1,200 square feet with a minimum net density of 4 du/ac and a maximum net density of 10 du/ac.**

LU 4 –Transportation

- **We believe that the proposed project will provide public streets and lots that will utilize existing transportation infrastructure and thereby promote the efficient use of the proposed and built environment. This development as proposed will implement the following policy:**
- *LU 4.1 Land use and transportation*
    - **This project includes a trip generation and distribution letter, which forecasts the future transportation needs of the project. This project as required will participate in the city's impact fee ordinance to mitigate transportation impacts from this development.**

LU 5 – Development Character

- **We believe that the development of this long plat will continue to utilize geographic areas that will maintain both the existing and proposed built environments without placing undue burden on the area residents or services. This development as proposed will implement the following policy:**
- *LU 5.5 Compatible development*
    - **As an infill development, this project is compatible with the existing single-family residences to the east, and with the approved plat to the north.**

LU 7 – Implementation

- **We believe that the development of this project will ensure the implementation of the goals and policies of the City's Comprehensive Plan by promoting infill development, thereby limiting sprawl opportunities.**

LU 8 – Urban Growth Area

- **The development of this project within the UGA and within the City's corporate limits meets the goals of this policy. This development as proposed will implement the following policy:**
- *LU 8.1 Role of Urban Growth Areas*
    - **This project is located within the UGA and the City of Spokane, where public facilities exist adjacent to or in the nearby vicinity.**

3. Please explain how the proposal meets the concurrency requirements of SMC Chapter 17D.010.

A. As identified in this section, this project will meet concurrency as defined for all elements (A to I) listed under 17D.010.010 Applicability and will not affect overall levels of service.

i. Transportation: the project will not add any additional densities not considered in the comprehensive plan and is agreeable to pay the City of Spokane Traffic Impact Fees associated with the region.

ii. Public Water: the additional water services will be reviewed by The City of Spokane Public Works and is in the Retail Water Service Area. A hydraulic model is included with this application as required by Spokane Water Department staff in the pre-development conference notes. Based upon preliminary calculations, the project expects to generate an average daily demand for water of 16,975.0 GPD (11.79 GPM), with a max day demand of 44,109.0 GPD (30.63 GPM) and peak hour demand of 74,985.3 GPD (52.07 GPM). Please see the attached SEPA Checklist.

iii. Fire Protection: The City of Spokane Capital Facilities Plan (Appendix C of the comprehensive plan) references the Washington Survey and Rating Bureau and states that areas greater than five road miles from a fire station receive a 9A rating and typically an increase of insurance rates. The project site is located 3.3 road

miles from the nearest fire station, station 4 at 1515 W. 1st Avenue. The project will not add any additional densities not considered in the comprehensive plan.

iv. **Police Protection: The City of Spokane 2024-2029 Adopted Citywide Capital Improvement Program indicates that 43% of the capital improvements until 2029 have been funded. This project will not add any additional densities that were not considered in the Comprehensive Plan.**

v. **Parks and Recreation: This project will provide approximately 0.42 acres of tracts, which includes open space. The nearest publicly owned park is Fish Lake Trail which is approximately 0.32 miles away from this development.**

vi. **Library: the project will not add any additional densities not considered in the comprehensive plan. The City of Spokane Capital Facilities Plan acknowledges that Library Levels of Service are currently inadequately maintained and further indicates that new facilities in the Qualchan area may be required; however, the lack of libraries in the area is an existing condition that will not be impacted by this project.**

vii. **Solid Waste disposal and recycling: the project will not add any additional densities not considered in the comprehensive plan. Comments from City of Spokane Solid Waste staff in the pre-development meeting notes indicate that the plans would be approved as shown.**

viii. **Schools: The project site is currently served by Hutton Elementary, Peperzak Middle School, and Lewis and Clark High School.**

ix. **Public wastewater (sewer and stormwater): Sewer and storm sewer for the vicinity of the project, with stormwater being handled via the SRSM under budget method with limited infiltration; however, the sewer from the project site passes by CSO 19, a combined sewer outfall that is considered controlled in the 2013 CSO plan amendment (page 2-6). The project will not add any additional densities not considered in the comprehensive plan. Based upon preliminary calculations, the project expects to generate a sewer capita flow (without peaking factor) of 6,500.0 GPD (4.51 GPM) and a peak flow of 22,750 GPD (15.80 GPM).**

B. As required, it is understood that further concurrency tests will be made by staff and other affected agencies. If a concurrency test were to be marginal, appropriate provisions would be implemented to bring this plat back into level of service conformance such as the payment of traffic impact fees or other modifications that may be required to meet the appropriate and identified levels of services for the noted facilities and services, these changes may affect existing water and sewer facilities.

4. If approval of a site plan is required, demonstrate how the property is suitable for the proposed use and site plan. Consider the following: physical characteristics of the property, including but not limited to size, shape, location, topography, soils, slope, drainage characteristics, the existence of ground or surface water and the existence of natural, historic or cultural features.

A. A copy of the preliminary plat is attached utilizing topography obtained in the field and supplemented by Washington State LIDAR and the proposed lots are adequate for required density as proposed. Some grading should be expected to ensure the establishment of proper building pads, roads and utility extensions.

B. The lots proposed in the project are generally consistent with those existing homes in the nearby Grandview area, however all lots will be developed in accordance with section 17C.111.

C. Soils, slope and drainage features have been considered as a part of this project, please see the attached geohazard evaluation.
D. Public utilities including water and sewer are available to this project. This project will be required to provide extensive water and sewer extensions for service. Preliminary design reports for water and sewer have been prepared and are a part of this application. Generally, this project will be required to install onsite water and sewer systems that will connect to sewer and water pump stations, force mains, transmission mains, pressure reducing stations and perhaps a reservoir.
E. There is no apparent evidence of groundwater or wetlands on the site.
F. There is no apparent evidence of historic or cultural features on site and a cultural resource survey has been ordered to verify that no historic or cultural features are onsite.
G. As required by the SRSM, all storm water will be treated and disposed on site or as allowed.

5. Please explain any significant adverse impact on the environment or the surrounding properties the proposal will have, and any necessary conditions that can be placed on the proposal to avoid significant effects or interference with the use of neighboring property or the surrounding area, considering the design and intensity of the proposed use.

A. We believe that the SEPA checklist that was prepared for this project as well as the existing zoning and inclusion within the city limits would have contemplated the addition of these lots on this property and therefore, this project is not anticipated to have any substantial impact to the neighboring property or the surrounding area as whole; however, traffic impacts will be mitigated to maintain levels of service as necessary.

6. Demonstrate how the proposed subdivision makes appropriate (in terms of capacity and concurrence) provisions for:
    a. Public health, safety and welfare

This project will successfully implement the goals and policies of the City's Comprehensive Plan and therefore as noted in the plan will provide for the public's health, safety and welfare, by providing housing in an area where little to no new housing is available during a time of documented housing shortage and a declared housing emergency.

    b. Open spaces

This project provides approximately 0.42 acres of tracts, with the largest tract located in the southeast quarter of the site. The provided open space is intended to be passive.

    c. Drainage ways

This project is being developed in accordance with the Spokane Regional Stormwater Manual. The drainage ways and drainage facilities will be designed to include the stormwater runoff from the proposed project; therefore, the project will meet this requirement.

    d. Streets, roads, alleys and other public ways

This project as proposed will provide both vehicular and pedestrian connectivity to the west, north and south of the property. All internal roadways will be constructed in conformance with the current City standards; therefore, the project will meet this requirement.

    e. Transit stops

This project does not occur in an area of direct transit service at this time; however, coordination with STA is included via City comment distribution.

f. Potable water supplies

This project is located within the City's water service boundary and will be served by City water, extensions and by looping water through the project streets. By existing policy, the City of Spokane Water Department requires that the water system provide the Specified LOS at a minimum pressure of 45 psi. We believe that the standard of LOS will be met. This project is in the Retail Water Service Area with an 8-inch ductile iron water main in W Thorpe Avenue that is proposed to serve the development.

g. Sanitary wastes

This project proposes to connect 26 additional units to public sewer. These additional connections fit within the comprehensive plan designation of R1. The gravity sewer main is proposed to be extended from Thorpe Avenue.

h. Parks, recreation and playgrounds

This project includes approximately 0.42 acres of passive open space.

i. Schools and school grounds

This project should not have a direct impact on schools and school grounds beyond those services provided by Spokane School District #81's own enrollment standards, therefore, as no concurrency test exists at this time based on a level of service impact, we believe concurrency is met for this element.

j. Sidewalks, pathways and other features that assure safe walking conditions

This project proposes sidewalks and/or paths and therefore will meet this requirement. If sidewalks are broken, heaved, or otherwise damaged prior to platting on adjacent streets, they will be replaced per city code.