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 RSF Zone.
B. According to Spokane Municipal Code Section 17c.110.030 - Characteristics of Residential Zones, the RSF zone is a low-density single-family residential zone. It allows a minimum of four and a maximum of ten dwelling units per acre. The RSF zone is applied to areas that are designated residential 4-10 on the land use plan map of the comprehensive plan.
C. Section 17c.110.115 states the following uses are allowed: single family residence (attached and detached) traditional housing, zero lot line, accessory dwelling unit and manufactured homes.
D. Section 17C.110.200 Development Standard Table 17C.110-3 will be met, including density, lot frontage and lot setbacks for all lots excepting the compact lots.
E. Section 17C.110.205 (F) land within a critical area may be subtracted from the calculation of density. The project area includes slopes greater than 30%
F. Section 17C.110.208 Lot Dimension standards will be met.
G. The remaining portions of Section 17C.110.200 to 17C.110.270 are or will be met as appropriate.
H. Chapter 17G.070 allows for Planned Unit Developments.

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 Single-Family Residential Areas
    o 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 General zone (5th and Cannon) located approximately 2.6 vehicular miles to the northeast or the Downtown Core (1st and Monroe) located approximately 3.2 vehicular 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
    o This project is located along Thorpe Road, where existing services and facilities are in place and can be reasonably extended into the development.
LU 4 – Transportation
- We believe that the proposed long plat 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 a single-family attached infill development, this project is compatible with the RSF zone to the east, south and west; and RMF zoning to the north. The PUD overlay assures compatibility with the adjacent RMF zoned land to the north by allowing for higher-intensity development while remaining within the RSF zone. It should be noted that the site has steep slopes that limit the density of the site, particularly along Victory Heights Drive.

LU 7 – Implementation
- We believe that the development of this long plat 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 long plat 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. Comments from City of Spokane Water Department staff in the pre-development conference notes indicate that water is anticipated to be approximately 71 psi at surrounding hydrants, which will meet city requirements of 45 psi for fire flow and potable water.
   - 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 vehicular 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 Capital Facilities Plan identifies that the city has funding to support an adequate level of service for police through 2023. The project will not add any additional densities not considered in the comprehensive plan.

v. Parks and Recreation: This project will supply at minimum 10 percent publicly available open space as required by SMC 17G.070.030.E.1.a. The nearest publicly owned park is Fish Lake Trail which is approximately 0.15 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. Currently, the closest library to the project site is the downtown public library.

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.

viii. Schools: The project site is currently served by district 81, specifically Wilson Elementary, Sacajawea Middle School, and Lewis and Clark High School. The capital facilities plan identifies that both Wilson Elementary and Lewis and Clark High School were in need of a classroom addition, which was set to be completed in 2020. The project will not add any additional densities not considered in the comprehensive plan.

ix. Public wastewater (sewer and stormwater): Sewer and storm sewer for the vicinity of the project, with stormwater discharging to drywells for 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. The project will not add any additional densities not considered in the comprehensive plan.

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 and timing of phases of the project.

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 PUD are single-family detached residences, single family detached residences on compact lots, and single family attached (townhouse) residences, with multifamily to the north. As each residence will be a single-family unit, this project is proposed to be generally consistent with the single-family residences to the north and south.

C. Soils, slope and drainage features have been considered as a part of this project.

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. A Geotechnical report has been or will be prepared for this proposal.

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 for 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. Other areas that may require some mitigation, although unknown at this time, might be water and sewer.

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

   b. Open spaces
      This project provides approximately 29.16 acres of tracts, with the largest tract located at the north end of the site. Per the definition of open space as areas of open tracts, the lots as proposed will provide satisfactory amounts of open space to fulfill the requirement and not place undue burden on other open spaces in the immediate area. No specific recreational tracts have been proposed at this time; however, many open space tracts are included which can be used for passive recreation.

   c. Drainage ways
      This long plat 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 long plat; therefore, the long plat will meet these requirements where practical roadside swales will be used, they will be supplemented with tract ponds or other treatment facilities.
d. Streets, roads, alleys and other public ways
This long plat as proposed will provide both vehicular and pedestrian connectivity to the west, north and south of the property. To the northeast are steep slopes and a railroad, while to the southeast is state owned natural parkland. All internal roadways will be constructed in conformance with the current City standards; therefore, the long plat 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 the STA is included via city comment distribution, see the trip generation and distribution letter for more information.

f. Potable water supplies
This long plat is located within the City’s water service boundary and will be served by City water, extensions and water looping through the project’s 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 distribution main and a 30-inch ductile iron transmission main in Thorpe Road that are proposed to serve the development, pipe extensions to support additional infrastructure may be required due to pressure zones within the area.

g. Sanitary wastes
This project proposes to connect 1,003 additional units to public sewer. These additional connections fit within the comprehensive plan designation of RSF. The gravity sewer main is proposed to be extended from Thorpe Road.

h. Parks, recreation and playgrounds
This project will supply at minimum 10 percent publicly available open space as required by SMC 17G.070.030.E.1.a. Additional recreation areas are available nearby, such as the nearby Fish Lake Trail.

i. Schools and school grounds
This long plat should not have a direct impact on schools and school grounds beyond those services provided by 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 long plat 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.