



DESCRIPTION OF THE PROPOSED AMENDMENT Please check the appropriate box(es):

(Inconsistent Amendments will only be processed every other year beginning in 2005.)

- | | |
|---|---|
| <input type="checkbox"/> Comprehensive Plan Text Change | <input checked="" type="checkbox"/> Land Use Designation Change |
| <input type="checkbox"/> Regulatory Code Text Change | <input type="checkbox"/> Area-wide Rezone |

Please respond to these questions on a separate piece of hot pink paper. Incomplete answers may jeopardize your application's chances of being reviewed during this amendment cycle.

1. General Questions (for all proposals):

- a. Describe the nature of the proposed amendment and explain why the change is necessary.
- b. How will the proposed change provide a substantial benefit to the public?
- c. Is this application consistent or inconsistent with the Comprehensive Plan goals, objectives and policies? Describe and attach a copy of any study, report or data, which has been developed that supports the proposed change and any relevant conclusions. If inconsistent please discuss how the analysis demonstrates that changed conditions have occurred which will necessitate a shift in goals and policies.
- d. Is this application consistent or inconsistent with the goals and policies of state and federal legislation, such as the Growth Management Act (GMA) or environmental regulations? If inconsistent, describe the changed community needs or priorities that justify such an amendment and provide supporting documents, reports or studies.
- e. Is this application consistent with the Countywide Planning Policies (CWPP), the comprehensive plans of neighboring jurisdictions, applicable capital facilities or special district plans, the Regional Transportation Improvement District, and official population growth forecasts? If inconsistent please describe the changed regional needs or priorities that justify such an amendment and provide supporting documents, reports or studies.
- f. Are there any infrastructure implications that will require financial commitments reflected in the Six-Year Capital Improvement Plan?
- g. Will this proposal require an amendment to any supporting documents, such as development regulations, Capital Facilities Program, Shoreline Master Program, Downtown Plan, critical areas regulations, any neighborhood planning documents adopted after 2001, or the Parks Plan? If yes, please describe and reference the specific portion of the affected plan, policy or regulation.
- h. If this proposal is to modify an Urban Growth Area (UGA) boundary, please provide a density and population growth trend analysis. Changes to the Urban Growth Area may occur only every five years and when the Board of County Commissioners (BoCC) reviews all UGA's countywide.

2. For Text Amendments:

- a. Please provide a detailed description and explanation of the proposed text amendment. Show proposed edits in "line in/line out" format, with text to be added indicated by underlining, and text to be deleted indicated with ~~strikeouts~~.
- b. Reference the name of the document as well as the title, chapter and number of the specific goal, policy or regulation proposed to be amended/added.

3. For Map Change Proposals:

- a. Attach a map of the proposed amendment site/area, showing all parcels and parcel numbers.
- b. What is the current land use designation?
- c. What is the requested land use designation?
- d. Describe the land uses surrounding the proposed amendment site (land use type, vacant/occupied, etc.)



Whipple Consulting Engineers, Inc.
Civil and Transportation Engineering

WCE No. 09-668

October 29, 2009

City of Spokane
Planning Services Department 3rd Floor, City Hall
808 W. Spokane Falls Blvd
Spokane, WA 99201-3343

Re: Land Use Designation Change
10809 N Indian Trail Road
Change from Mini Center Land Use to General Commercial Land Use

Dear Sirs

This letter is intended to answer the general questions on the Land Use Code Amendment Application. For convenience the general questions are provided below with our responses.

1. General Questions (for all proposals)

a. Describe the nature of the proposed amendment and explain why the change is necessary.

The proposed Land Use Code Amendment proposes to change the current land use designation of Neighborhood Mini Center to the proposed land use of General Commercial. The subject property located at 10809 N Indian Trail Road Parcel # 26166.0054, is an undeveloped lot surrounded by developed land uses.

The proposed land use change will provide greater development flexibility without adverse impacts to the neighboring residential land uses. At the present time the 6.47 acre site is too large for the site to be economically phased and developed under the Neighborhood Mini Center (NMC) designation. We believe that when the comprehensive plan was prepared an error placing this NMC designation on this property was made and that the parcel should have been designated GC. We believe this because the Comprehensive Plan, under section L.U. 1.6 Neighborhood Center, clearly states that NMC should not be larger than 2.0 acres, yet this site was designated NMC at 6.47 acres. We believe that at the time the Comprehensive Plan was updated under GMA and the Center and Corridor concept moved through the internal and external process at that time, that a center was preferred as the plan attempted to create connectivity between commercial entities and the surrounding neighborhood areas in an attempt to deemphasize auto centered commercial areas, hence it appears that small commercial areas, even those (such as this parcel) were made NMC to deal

with the new concepts to make commercial areas more livable and walkable, yet the net result, in our opinion, has been to diminish commercial activity, through which this parcel has endeavored as undevelopable under the same designation.

We understand that the Comprehensive Plan is a broad brush, proposing changes in lifestyles, which while plausible, need to pass the economic test of viability before they can be implemented. We believe that this is the case for this property. The intent of the walkable and less auto oriented commercial area, may be the right choice for those areas around Shadle Center, the Garland District, lower South Perry, even the NMC on Indian Trail Road supporting the existing Yokes store or other existing and built out areas within the Greater Spokane area. However, out here on Indian Trail Road, a principal arterial road whose main function is not "intra" area travel but mostly "inter" area travel providing a link between the Rutter Parkway and 9 Mile areas and Spokane, it is impractical and needs to be able to focus on auto centered commercial uses.

A key factor to the success of a walkable neighborhood retail center as proposed by the neighborhood mini-center designation is the amount of surrounding residential units. An overall review of this north Indian Trail area reveals that it is at the very edge of the City, and is surrounded by undeveloped land to the north, located outside of the UGB, to the east is the Meadowglen Park and Conservation Area, and to the south and west are single family residential uses.

Additionally a review of the surrounding area shows the sparse density and development limitations of the area. A mile +/- to the east is the Five Mile Bluff separating the Five Mile Plateau from the Indian Trail Bench, to the west is the lower Francis or Nine Mile Road area, and to the north is undeveloped farmland located outside of the urban growth area. Each of these elements have limited the development in the area. And is geographically separated from those areas of Five Mile Plateau and Nine Mile Road neighborhoods for those types of non-auto centered uses as the route of pedestrian travel would be steep and inconvenient and would lend itself more to an auto-centered use. Additional, a review of aerial photos of this area from 1995 and 2006 show that within the immediate vicinity the growth of this northern Indian Trail area is limited by three features that would keep a pedestrian centered neighborhood type retail area non-economically viable. These are; the Urban Growth Area (UGA) boundary to the north, the Meadow Glen Park and Conservation Area, and the steep hillsides to the East and West. At the present time within approximately a ½ mile radius there are only 714 residential units/lots to provide service to a NMC type development, and 572 residential units/lots within an additional ¾ mile radius. For a total of 1,286 residential units/lots to provide service to/for a NMC type development.

For example, if you were to take a look at an aerial photo of the NR-35 parcel where the existing Yokes store is on Indian Trail Road and compare it to the aerial photo from this site, you would notice that within a ½ mile radius of the Yokes store, there are 3 to 4 times as many residential units, upwards of 2,000 to 2,500 units with more direct

pedestrian access. The aerial photo comparisons are striking and explain the differences as well as any explanation as to the economic success or failure of either of the NMC's. The fact is that this site needs to be more auto oriented, less pedestrian oriented and the only way to achieve this per the Comprehensive Plan is to allow the greatest flexibility in development and change the site to General Commercial (GC).

b. How will the proposed change provide a substantial benefit to the public?

The public will be benefitted by this change on a regional and local scale. By providing auto oriented commercial uses along an established arterial and commuter route. The public both regionally and locally will have access to a viable future commercial development. Additionally, the surrounding residential uses will be buffered from parking lot activity and noise by the development of buildings along the back or sides of the lot.

c. Is this application consistent or inconsistent with the comprehensive plan goals, objectives and policies? Describe and attach a copy of any study, report or data, which has been developed, that supports the proposed change and any relevant conclusions. If inconsistent please discuss how the analysis demonstrates that changed conditions have occurred which will necessitate a shift in goals and policies.

We believe that our proposal to change from NR-35/MC to GC is consistent with the Goals and Policies of the Comprehensive Plan as it relates to the definitions, descriptions, and specific policies within the Comprehensive Plan.

Specifically, a review of the Comprehensive Plan reveals the following:

Comp. Plan Section - 2.2 Growth Management Act Overview; wherein a change from MC/NR-35 to GC is supported by all thirteen elements noted within this section.

- Urban Growth – the development is an existing parcel within the existing UGA boundary, in the City of Spokane.
- Reduce Sprawl – this proposal does not propose an expansion of the UGA boundary, therefore, promotes infill of the current urban condition.
- Transportation – this proposed change proposes to use the adjacent arterial and the existing bus system in the area to promote a more auto oriented development without having to add to the existing transportation or multi-modal (bus) system.
- Housing – this proposal does not remove housing from the overall mix, and the proposed change could encourage a more dense residential development along with a viable commercial enterprise.
- Economic Development – this parcel has sat vacant for years and since 2001 has been marketed with the current land use designation. The economic benefit would be to make the land use change as requested and to bring this parcel into

development as a productive commercially viable property paying increased property and sales taxes.

- Property Rights – we believe that the proposed change fixes an oversight from the original Comprehensive Plan by allowing the owner to truly pursue development to its highest and best use, given the 4.3 Ac size.
- Permits – this change has no effect on this element
- Natural Resource Industries – this change has no effect on this element
- Open Space and Recreation – this change has no effect on this element
- Environment – this change would have no effect to the air or water quality or the availability of water to the surrounding area.
- Citizen Participation and Coordination – as required by SMC, RCW and WAC the comprehensive plan revision policies require public notice, participation and comment of this proposal all the way through the City Council hearing process.
- Public Facilities and Services – this change in use from mini-center to general commercial will not have any increase in required public services, the amount of water, sewer, electrical, gas, police, fire, etc... would remain consistent with the current land use designation.
- Historic Preservation – this change would have no effect on this element.

Comp Plan Section - 3.3 Vision and Values

Vision

“Growth will be managed to allow a mix of land uses that fit, support, and enhance Spokane’s neighborhoods, protects the environment, and sustains the downtown area and broaden the economic base of the community.”

Values

“The things that are important to Spokane’s Future include:

- *Acquiring and preserving the natural areas inside and outside the city.*
- *Controlling urban sprawl in order to protect outlying rural areas.*
- *Developing and maintaining convenient access and opportunities for shopping, services, and employment.*
- *Protecting the character of single family neighborhoods.*
- *Guaranteeing a variety of densities that support a mix of land uses*
- *Utilizing current residential lots before developing raw land.*

This proposed change would continue to promote these community values along with the individual economic considerations and values of the underlying land owner. The property as it currently sits at 6.4 acres is too large for a reasonable mini-center, has had no opportunity for development since originally placed in this land use category and does not lend itself to community or pedestrian use. Primarily being along a busy arterial, in an area that confines residential development by topographic constraints, city parks, the UGA, etc... a change to a realistic development code consistent with the values statement needs to be implemented.

Development of this property will fill an infill parcel, reduce demand for additional land use changes within the area and help fulfill the goals of this section.

Comp Plan Section - 3.4 Goals and Policies

“Other important directives of the land use goals and policies include:

- *Limiting commercial and higher density development outside centers and corridors the support growth and development of centers and corridors*
- *Directing new higher density housing to centers and corridors and restricting this type of development in single family areas.*
- *Using design guidelines to ensure that commercial buildings and higher density housing are compatible with existing neighborhood character in and around centers and corridors.”*

Very clearly, when the body of evidence attached to this letter is reviewed, it will be obvious that a mini-center without the surrounding support in sheer numbers of residential roof tops, cannot meet the goals of neighborhood centers and must be re-designated to a more conducive retail opportunity than that provided for under the mini-center designation. We believe that a change to GC, more clearly meets the goals and policies of this section of the comprehensive plan.

LU 1 Citywide Land Use

Goal: Offer a harmonious blend of opportunities for living, working, recreation, education, shopping, and cultural activities by protecting natural amenities, providing coordinated, efficient and cost effective public facilities and utility services, carefully managing both residential and non residential development and design, and proactively reinforcing downtown Spokane’s role as the urban center.

LU 1.1 Neighborhoods

Utilize the neighborhood concept as a unit of design for planning housing, transportation, services and amenities.

Discussion: *Neighborhoods should have identifiable physical boundaries, such as principal arterial streets or other major natural or built features. Ideally, they should have a geographical area of approximately one square mile and a population of around 3,000 to 8,000 people.*

When the physical constraints such as the bluff and hill to the east and west side of Indian Trail Road, the City Park, the UGA, etc... are considered and marked on an Assessor's map(s) of the area (attached), the area surrounding this site only has 714 single family homes constructed at this time within a ½ mile radius. As the radius increases to ¾ of a mile there are 572 additional homes for a total of 1,286 homes within walking or bicycling distance. With 2.7 residents per unit, that would only be 3,472 people. Therefore, a neighborhood, center based on pedestrian travel is wholly unrealistic and the site must be able to take advantage of the Indian Trail Road arterial to be economically viable by drawing in auto-oriented traffic, to a mix

and style of commercial uses that are allowed to be dissimilar, given the size of the lot in question at 6.47 ac. A copy of a reduced assessor's map of this area is attached in the appendix.

LU 1.2 Districts

Identify districts as the framework for providing secondary schools, larger park and recreation facilities, and more varied shopping facilities.

While an existing mini-center this site does not qualify as a district whether it is considered as a Mini Center or General Commercial.

LU 1.3 Single-Family Residential Areas

Protect the character of single-family residential neighborhoods by focusing higher intensity land uses in designated centers and corridors.

A change to GC in this location will not affect nor have any impacts to the viability of single-family residential uses in the area. Furthermore the change to GC at this location will protect the existing single family residential uses from being located adjacent to a parking lot as required under MC. With development under the GC standards auto oriented development will place buildings along the back of the lot and parking along the arterial frontage, which would utilize the building(s) as a buffer and protect for the residential uses from the noise and light glare of a parking lot.

LU 1.4 Higher Density Residential Uses

Direct new higher density residential uses to centers and corridors designated on the land use map.

As described and as noted in the zoning code, both the GC and MC designations allow for higher residential uses as a way to achieve higher limits or levels to sustain neighborhood business. On this site, even though it is 6.4 acres, the site is not large enough to add the 800 to 1,000 units that would need to be added to support neighborhood businesses on this site. It is clear that this site needs to provide a site capable of supporting a large user, that can draw traffic from Nine Mile Road which would include a larger Floor Area Ratio (FAR) than allowed in the NR-35 zone, especially the ability to provide second story development type uses above the 35 foot limit.

LU 1.5 Office Uses

Direct new office uses to centers and corridors designated on the land use map

As described office uses are "an important component of a center", on the fringe of the urban area, a center is not necessary a center of activity rather an opportunity for the last capture of economic spending prior to the shopping dollar leaving the area and missing the economic chance for capture. In the absence of economic activity along the route of travel, destinations, that would never have believed that they

could support an economic activity develop the activity, which is happening in the 9-Mile Falls and Suncrest areas, only in the end to have it be under performing and destined for failure. In this location, the site needs to be flexible and offer the greatest amount of FAR area it can. In this case, allowing a larger FAR (2.5) for a GC site could accomplish more office space and commercial together than what would be allowed in the mini-center designation of NR-35 (FAR of 0.80) which could increase economic activity and opportunities for the surrounding area.

LU 1.6 Neighborhood Retail Use

Direct new neighborhood retail use to neighborhood centers designated on the land use plan map

Discussion: *To ensure that neighborhood retail use is attracted to centers, future neighborhood retail development is directed to the centers. Neighborhood retail areas located outside centers are confined to the boundaries of the neighborhood retail designations.*

The neighborhood retail designation recognizes the existence of small neighborhood serving businesses in locations that are not larger than two acres and that lie outside of designated centers. These locations are usually found along arterial streets, typically at the intersection of two arterials. In neighborhoods that are not served by a center, existing neighborhood businesses provide nearby residents access to goods and services...

...Businesses that are neighborhood-serving and pedestrian oriented are encouraged in neighborhood retail locations. Buildings should be oriented to the street and provide convenient and easily identifiable sidewalk entries to encourage pedestrian access. Parking lots should not dominate the frontage and should be located behind or on the side of buildings. Drive-through Facilities, including gas stations and similar auto-oriented uses, tend to provide services to people who live outside the surrounding neighborhood and should be allowed only along principal arterials and be subject to size limitations and design guidelines.

The description of this element, specifically notes that it is intended to recognize existing small neighborhood-serving (NR type) businesses in locations that are not larger than two acres. In this instance the site is larger than two acres, three times as large at 6.4 acres and is vacant. Now that doesn't mean that development under the GC designation won't provide some sort of neighborhood, type residential uses such as a small restaurant, hair dresser, insurance agent, etc... however it needs to be economically provided as a part of a larger center with more to offer due to the larger FAR allowances.

LU 1.7 Neighborhood Mini-Centers

Create a neighborhood mini-center wherever an existing neighborhood retail area is larger than two acres.

***Discussion:** The neighborhood mini-center designation recognizes the existence of small neighborhood-serving businesses in locations that are two to five acres in size that lie outside centers and corridors designated on the land use plan map... .Similar to neighborhood retail, the neighborhood mini center designation consists of small, freestanding businesses usually sited at the intersection of or along arterial streets...*

Again, as with the above LU 1.6, this designation is intended to recognize the existence of small “neighborhood-serving businesses in locations that are two to five acres”.

Within the description of NMC, the uses for drive-thru auto oriented uses are not encourage and limited to design review. Additionally, a “new urbanism” type approach is noted as the preferred method with parking behind away from the street. In the configuration for this property, this would be in conflict with the existing residential neighborhood surrounding the property, where we believe the buildings should be used as much as possible to shield the surrounding neighborhood uses from vehicles and access issues which would be exacerbated by the “new urbanism” approach. Realistically, with the goals listed, it would be unrealistic to believe that all MC sites would be able to develop as described if for no other reason, than a complex series of site specific circumstances and requirements which need to be available for development, such as the correct amount of traffic, the correct existing number of residential units, enough planned residential units, a walkable community (where people walk first and drive second), etc... For this location, with the absence of all other issues noted as important for a mini-center, therefore, we have determined in order to properly market and develop this parcel; GC is the best solution available for this parcel.

LU 1.8 General Commercial Uses

Contain general commercial areas within the boundaries occupied by existing business designations and within the boundaries of designated centers and corridors.

Discussion: General Commercial areas provide locations for a wide range of commercial uses. Typical developments in these areas include freestanding business sites and larger grouped businesses (shopping centers). Commercial uses that are auto oriented and include outdoor sales and warehousing are also allowed in this designation. Land designated for general commercial use is usually located at the intersection of our in strips along principal arterial streets. In many areas...

Recognizing existing investments by both the City of Spokane and private parties, and given deference to existing land use patterns, an exception to the containment policy may be allowed by means of a comprehensive plan amendment to expand an existing commercial designation, (Neighborhood Retail, Neighborhood Mini-Center, or General Commercial) at the intersection of two principal arterial streets or onto properties which are not designated for residential use...

As described, GC is intended to provide locations that can offer a wide range of commercial uses. GC sites are best when located along arterials and allows for auto centered development, and other free standing type development including outdoor sales, warehousing. More importantly, this use describes the property as a strip development along an existing principal arterial or state highway, which this is. It is our opinion that development on this site should be allowed to be implemented to the GC standards, allowing for higher FAR's than allowed under the NMC/NR designation. We are not asking for an expansion of the existing site, we are only requesting that it be allowed to be developed to a higher standard with more flexibility than allowed under the NMC/NR designation and we believe that after unsuccessfully marketing the site with the existing designation since implementation of the updated Comprehensive Plan in 2001, to follow the GMA guidelines, that as a property owner we should be allowed to pursue marketing and development options under a new category, we believe GC is the best category for that development. As it relates to the originally intended mixed use, the GC designation allows for mixed use development as it allows for residential, both single family and multi-family developments, mixed use buildings with residential above retail or office and also office uses, etc... that can make this a viable and area supportive site. As described the NR-35 option does not accommodate 2-story development for either mixed use or commercial/office enterprises and would only apply to a 2 story residential development, which doesn't affect the FAR at all.

LU 1.9 Downtown

Recognize the direct relationship between citywide land use planning and the present and future vitality of downtown Spokane.

A change to GC in this location will not affect nor have any impacts to the viability of a strong downtown core.

LU 1.10 Industry

Provide a variety of industrial locations and site sizes for a variety of industrial development and safeguard them from competing land uses.

A change to GC in this location will not affect nor have any impacts to the industrial land use category.

LU 1.11 Agricultural

Designate areas for agriculture lands that are suited for long term agricultural production.

A change to GC from NMC/NR has no affect to this land use category, as it is unaffected by the change.

LU 1.12 Public Facilities and Services

Ensure that public facilities and service systems are adequate to accommodate proposed development before permitting development to occur.

A change to GC from NMC/NR will have no impact to the level of service that the site would have required under either development scenario as it relates to concurrency for fire, police, parks and recreation, libraries, sewer, water solid waste, recycling, transportation or schools. Additionally, the site, being located in sandy loam soils (SwB) will allow that adequate storm drainage will be able to be met for all development scenarios. It is also anticipated that during development adequate provisions for paving, sidewalks, lighting, traffic access, circulations, parking and loading facilities, transit, bicycle and pedestrian facilities as applicable will be provided for as required.

LU 1.13 Parks and Open Spaces

Develop funding mechanisms, incentives, and other methods to procure land for formal parks and/or natural open space in existing and new neighborhoods based upon adopted standards of the Comprehensive Plan.

A change to GC in this location will not affect nor have any impacts to this land use category.

LU 1.14 Existing Uses

Avoid the creation of large areas of nonconforming uses at the time of adoption of new development regulations.

A change to GC in this area, an area that has been zoned in one form or another as “commercial” since the residential developments were originally constructed will not change the expectation of the existing surrounding residential uses that this parcel is and will remain commercial in character. The new comprehensive plan for GC and accompanying zoning regulations are much more neighborhood friendly than the older codes that were in force previous to this site being changed to NMC/NR. The new code allows much more protection in all areas related to new development as it relates to its impacts to the existing residential areas as it relates to light, traffic, air and space, etc... yet allowing the site to be developed to it’s highest and best use, which in the owners opinion is GC.

LU 2 Public Realm Enhancement

Goal: Encourage the enhancement of the public realm

LU 2.1 Public Realm Features

Encourage features that improve the appearance of Development, paying attention to how projects function to encourage social interaction and relate to and enhance the surrounding urban and natural environment.

A change to GC in this location should have no affect to development on this parcel or to the “public realm” as a whole. Development will need to meet the requirements

of the zone, plus any other issues such as design review, etc... that may be imposed once a building permit is applied for.

LU 2.2 Performance Standards

Employ performance and design standards with sufficient flexibility and appropriate incentives to ensure that development is compatible with surrounding land uses

A change to GC would continue to follow the standards set by the City and/or the specific neighborhood in development of this property. It is assumed that all proposed projects will meet or exceed these standards of development.

LU 3.0 Efficient Land Use

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

LU 3.1 Coordinated and Efficient Land Use

Encourage coordinated and efficient growth and development through infrastructure financing and construction programs, tax and regulatory incentives, and focused growth in areas where adequate services and facilities exist or can be economically extended.

As described, the NMC should have allowed for a more diverse development, but the NR designation, limited the FAR allowances for the site, and due to the sites' unique shape along a major arterial, it is difficult to meet parking requirements and limited FAR as required under the NMC/NR designation. The existing zones and the GC zones require many of the same development standards, but the GC zone gives greater use flexibility and higher density allowances to attract more businesses, office uses, and residential mixed use developments than does the standard allowances under the NMC/NR designations currently on the site.

LU 3.2 Centers and Corridors

Designate centers and corridors (neighborhood scale, community or district scale, and regional scale) on the land use plan map that encourage a mix of uses and activities around which growth is focused.

The center designation to Mini-Center and then with a NR-35 zone in our opinion does not implement a center, just because it is labeled as such. In our opinion, the designation as MC, was erroneously applied as has been stated, this is true, when you just compare aerial photos from the center on Indian Trail Road (Yokes) and this site, they were both designated MC/NR-35, the difference was that one site was existing the other one was undeveloped. The requirements and limitation of NR have been detrimental to the development of this site due to FAR limitations, the uncertainty of mixed use or "new urbanism" type of development with residential either contiguous or above retail developments. The initial cost of investment is too high, with residential having to burden the retail, it is for this reason that 9 years after being proposed, very few if any true center projects have been proposed or

constructed. Also, as has been discussed previously in this document, the geographic constraints of this location, the limited opportunity for high levels of pedestrian interaction within the area of the site, the lack of pedestrian facilities (sidewalks) within the surrounding neighborhoods, lack of signals to cross Nine Mile Road, etc... do not lend this site to the same pedestrian, neighborhood friendly, intra-area development as envisioned. It is, upon further review and having been marketed as a NR-35 site since the change time to change to GC and give the underlying land owner the opportunity to develop and/or market this parcel under the GC label or develop himself as he see's fit. We feel that an opportunity to be more far reaching in more of an inter-area type development, using the existing transit routes and the Indian Trail Road as an opportunity to draw business into the area, will not only allow this site to be developed, but which as a fallout of development provide some much needed local services that are found further southeast on Indian Trail Road and on Francis Avenue at the 5-Mile shopping center area. Lastly, based on a narrow rectangular lot development where the buildings are focused on the street, it is unrealistic, not economical to develop and would not nor does not meet the expectations of the motoring or shopping public for an auto-oriented facility, which must be developed on this site.

LU 3.3 Planned Neighborhood Centers

Designate new centers or corridors in appropriate locations on the land use plan map through a neighborhood planning process.

As this site is currently a NMC, this section does not apply and a change to GC will have little to no affect on this element of the Comp Plan.

LU 3.4 Planning for Centers and Corridors

Utilize basic criteria for growth planning estimates and subsequently, growth targets for centers and corridors.

As this site is currently a NMC, this section does not apply and a change to GC will have little to no affect on this element of the Comp Plan.

LU 3.5 Mix of Uses in Centers

Achieve a proportion of uses in centers that will stimulate pedestrian activity and create mutually reinforcing land uses.

As this site is currently a NMC, this section does not apply and a change to GC will have little to no affect on this element of the Comp Plan because as oriented, and situated, not enough pedestrian activity could be established to make the pedestrian element in this location a viable element. Additionally, as a development opportunity, in addition to having a blank "canvas" to create a development upon, having a required mix of development is a detriment to land development, especially in this location where the elements are impractical, expensive and have no benefit.

For this reason alone, the change to GC should be allowed to give the greatest amount of flexibility to a commercial development on this site.

LU 3.6 Neighborhood Centers

Designate the following nine locations as neighborhood centers on the land use plan map: Indian Trail and Barnes; 9th and Perry; Grand Boulevard/12th to 14th; Garland; Broadway and Maple area; Hamilton and Mission; Lincoln and Nevada; Fort George Wright Drive and Government Way; 3rd and Thor

As noted this project site is not on this list and therefore will have no impact to this element of the Comp Plan.

LU 3.7 District Centers

Designate the following five locations as district centers on the land use plan map: Shadle – Alberta and Wellesley; Lincoln Heights – 29th and Regal; Fairgrounds; 57th and Regal; Manito Center – 29th and Grand

As noted this project site is not on this list and therefore will have no impact to this element of the Comp Plan.

LU 3.8 Employment Centers

Designate the following five locations as employment centers on the land use plan map: East Sprague – Sprague and Napa; North foothills and Nevada; Maxwell and Elm; Holy Family – Franklin Park Mall, generally located in the area bounded by Addison, Division, Queen, and Francis; North Nevada, between Westview and Magnesium.

As noted this project site is not on this list and therefore will have no impact to this element of the Comp Plan.

LU 3.9 Corridors

Designate the following two locations as corridors on the land use map: North Monroe Street; North Market Street, from the north end of the Hillyard Business District to Garland.

As noted this project site is not on this list and therefore will have no impact to this element of the Comp Plan.

LU 3.10 Regional Center

Designate Downtown Spokane as the regional center

As noted this project site is not on this list and therefore will have no impact to this element of the Comp Plan.

LU 3.11 Compact Residential Patterns

Allow more compact and affordable housing in all neighborhoods, in accordance with neighborhood-based design guidelines.

As described, this change to GC will have no impact to this element of the Comp Plan.

LU 3.12 Maximum and Minimum Lot Sizes

Prescribe maximum, as well as minimum, lot size standards to achieve the desired residential density for all areas of the city.

As described, this change to GC will have no impact to this element of the Comp Plan.

LU 3.13 Shared Parking

Encourage shared parking facilities for business and commercial establishments that have dissimilar peak use periods.

As described, this change to GC will have no impact to this element of the Comp Plan.

LU 4 Transportation

Goal: Promote a network of safe and cost effective transportation alternatives, including transit, carpooling, bicycling, pedestrian-oriented environments, and more efficient use of automobile, to recognize the relationship between land use and transportation.

LU 4.1 Land Use and Transportation

Coordinate land use and transportation planning to result in an efficient pattern of development that supports alternative transportation modes consistent with the transportation chapter and makes significant progress toward reducing sprawl, traffic congestion, and air pollution.

LU 4.1 Land Use and Transportation

Coordinate land use and transportation planning to result in an efficient pattern of development that supports alternative transportation modes consistent with the transportation chapter and makes significant progress toward reducing sprawl, traffic congestion, and air pollution.

As described, while the change from NMC/NR to GC has the potential to generate more trips, the impact would be negligible due to the reality that most of the trip generation for this site will be from/to Indian Trail Road with pass-by capture in the 60 to 70 percent range.

LU 4.2 Land Uses that Support Travel Options

Provide a compatible mix of housing and commercial uses in neighborhood centers, district centers, employment centers, and corridors.

As described, this change from NMC/NR to GC will have no impact to this element of the Comp Plan.

LU 4.3 Neighborhood Thru-Traffic

Create boundaries for new neighborhoods through which principal arterials should not pass.

As described, this change from NMC/NR to GC will have no impact to this element of the Comp Plan.

LU 4.4 Connections

Design residential, commercial, and industrial development that takes into consideration the connections, both vehicular and pedestrian, to adjoining sites to reduce personal automobile trips.

As described, this change from NMC/NR to GC will have no impact to this element of the Comp Plan.

LU 4.5 Block Length

Create a network of streets that is generally laid out in a grid pattern that features more street intersections and shorter block lengths.

As described, this change from NMC/NR to GC will have no impact to this element of the Comp Plan.

LU 5 Development Character

Goal: Promote development in a manner that is attractive, complementary and compatible with other land uses.

LU 5.1 Built and Natural Environment

Ensure the developments are sensitive to and provide adequate impact mitigations that they maintain and enhance the quality of the built and natural environment (e.g. air and water quality, noise, traffic congestion, and public utilities and services)

As described, this change from NMC/NR to GC will have no impact to this element of the Comp Plan.

LU 5.2 Environmental Quality Enhancement

Encourage site locations and design features that enhance environmental quality and compatibility with surrounding land uses.

As proposed this change from NMC/NR to GC will allow for more versatility in planning and site development which will protect the surrounding single family residential land uses from the noise and activity of a commercial parking lot located along the back and sides of the lot.

LU 5.3 Off-Site Impacts

Ensure that off-street parking, access, and loading facilities do not adversely impact the surrounding area.

With the change to GC, adequate parking on site will be provided as the offsite street system in this area does not lend itself to off-site parking either for employees or patrons; therefore, as described, this change to GC will have no impact to this element of the Comp Plan.

LU 5.4 Natural Features and Habitat Protection

Ensure development is accomplished in a manner that protects significant natural features and wildlife habitat.

As described, this change from NMC/NR to GC will have no impact to this element of the Comp Plan.

LU 5.5 Compatible Development

Ensure that infill and redevelopment projects are well designed and compatible with surrounding uses and building types.

As described, this change from NMC/NR to GC will have no impact to this element of the Comp Plan other than to allow for the protection of the properties along the property boundary to be shielded from vehicular travel to and from the site by building scale, etc...

LU 6 Adequate Public Lands and Facilities

Goal: Ensure the provision and distribution of adequate, well-located public lands and facilities throughout the city.

This change from NMC/NR to GC will have no impact to this section and/or all of the sub-elements of this Comp Plan Section.

LU 7 Implementation

Goal: Ensure that the goals and policies of the comprehensive plan are implemented.

This change from NMC/NR to GC will have no impact to this section and/or all of the sub-elements of this Comp Plan Section.

LU 8 Urban Growth Area

Goal: Provide an urban growth area that is large enough to accommodate the expected population growth for the next 20 years in a way that meets the requirements of the CWPPs

This change from NMC/NR to GC will have no impact to this section and/or all of the sub-elements of this Comp Plan Section.

LU 9 Annexation Areas

Goal: Support annexations that create logical boundaries and reasonable service areas within the city's urban growth area, where the city has the fiscal capacity to provide services

This change from NMC/NR to GC will have no impact to this section and/or all of the sub-elements of this Comp Plan Section.

LU 10 Joint Planning

Goal: Support joint growth management planning and annexation requests, which best meet the Comprehensive Plan's development goals and policies.

This change from NMC/NR to GC will have no impact to this section and/or all of the sub-elements of this Comp Plan Section.

This concludes our review of the Comprehensive Plan.

- d. Is this application consistent or inconsistent with the goals and policies of state and federal legislation, such as the Growth Management Act (GMA) or environmental regulations? If inconsistent, describe the changed community needs or priorities that justify such an amendment and provide supporting documents reports or studies***

This application is consistent with the goals and policies of state and federal legislation. The subject property is located within the GMA and will provide retail services to neighboring residential land uses.

- e. Is this application consistent with the Countywide Planning Policies (CWPP), the comprehensive plans of neighboring jurisdictions, applicable capital facilities or special district plans, the Regional Transportation Improvement District, and official population growth forecasts? If inconsistent please describe the changed regional needs or priorities that justify such an amendment and provide supporting documents, reports or studies.***

This application is contained within the City of Spokane and is therefore consistent with county and neighboring jurisdiction plans as well as regional transportation and population growth. This application makes no request to change these documents.

- f. Are there any infrastructure implications that will require financial commitments reflected in the Six-Year Capitol Improvement Plan?***

There are no implications to existing or proposed infrastructure plans from this application

- g. Will this proposal require an amendment to any supporting documents, such as development regulations, Capital Facilities Program, Shoreline master Program, Downtown Plan Critical areas regulations, any***

***neighborhood planning documents adopted after 2001, or the Parks Plan?
If yes, please describe and reference the specific portion of the affected
plan, policy or regulation.***

This proposal will not require the amendment of any supporting documents as the subject property is not included within the Capital facilities program, the shoreline master program, the downtown plan or any known neighborhood plans.

h. If this proposal is to modify an Urban Growth Area (UGA) boundary, please provide a density and population growth trend analysis. Changes to the Urban Growth Area may occur only every five years and when the Board of County Commissioners (BoCC) reviews all UGA's countywide.

The Urban Growth Boundary will not be modified by this proposal.

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

Thank you



Todd R. Whipple, P.E.

TRW/bng

Encl: Assessor map exhibit

CC: File