

# FACT SHEET

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## City of Spokane Draft Comprehensive Plan and Final Environmental Impact Statement

**Description of Proposal:** The proposal is to adopt a new comprehensive plan -- which includes a description of existing conditions, goals, policies, implementation strategies, land use map – initial development regulations, and zoning map, to guide growth and development in the City of Spokane planning area over the next twenty years. The Initial Development Regulations and zoning map are not being analyzed at this time. Subsequent environmental review processes will analyze those documents.

**State Environmental Policy Act and Growth Management Act Integration:** Development and review of the City of Spokane’s Comprehensive Plan, pursuant to the Growth Management Act (GMA), is being “integrated” with State Environmental Policy Act (SEPA) requirements, pursuant to the provisions of WAC 197-11-210 et seq. As such, the City of Spokane’s environmental documents and planning processes have sought to combine the information, analysis and public review requirements of both SEPA and GMA and to promote their environmental, economic and other goals and to mitigate probable adverse environmental impacts.

**Alternatives:** Five land use alternatives are reviewed in this Final EIS, as follows:

**No Action.** No Action assumes continuation of the Interim Urban Growth Area (UGA) adopted in 1996. The city is proposing to expand its UGA, and the other land use alternatives are based on larger UGAs. No Action provides a basis for comparing impacts associated with these larger UGAs. The mix of land uses and the overall land use pattern would generally be the same as Current Patterns. However, residential densities would have to increase significantly (between approximately 8 and 15 net dwelling units per acre for new development) to accommodate the 20-year population target 68,800 within this smaller area.

**Current Patterns.** The city’s UGA would consist of 65,749 acres. This is the largest of the UGAs examined. It assumes only those changes in planning policy required by the GMA. Current land uses and land use patterns would continue over the next 20 years. Development would continue to move outward from the periphery of the city; commercial and office uses would follow the same pattern, including development at arterial intersections and in strips in major transportation corridors.

**Mixed-Use Centers and Corridors.** The UGA for the Centers and Corridors alternative is 64,508 acres. This alternative would focus a portion of projected growth at higher densities in planned, mixed-use centers of different scales (Neighborhood, District and Employment), and along existing transportation corridors. The centers, which would be designated on the Comprehensive Plan land use map, would include a mix of land uses, including high density residential, commercial, public and institutional, and open space; the uses and their proportions would vary by center. Downtown Spokane would remain the economic and cultural center of the region with an emphasis on new housing choices and services.

**Plan Commission Recommended Plan.** Following review of the Draft Plan/EIS, extensive public input, and deliberations, the City of Spokane Plan Commission recommended an alternative land use plan to the City Council for consideration. The revisions recommended by the Plan Commission make numerous technical changes to the text of draft plan policies and to the land use map. Overall, however, their recommended plan is substantially the same as the Centers and Corridors alternative.

Relative to Centers and Corridors, the UGA would be slightly larger (less than 20 acres), and the number and location of designated centers would change somewhat. Housing would be 65

percent single-family and 35 percent multi-family. In general, the land use pattern would be the same as Centers and Corridors.

**Central City.** The UGA for the Central City alternative would be the same as for Mixed-Use Centers and Corridors. Downtown Spokane would remain the economic and cultural center of the region. The downtown is generally defined as Boone Avenue on the north, I-90 to the south, Division Street on the east, and maple Street/Riverside Avenue/Monroe Street on the west. Relatively more growth would be focused in and around downtown (including the West Central/Summit and South/Southwest neighborhoods) at higher densities. Compact, higher density mixed-use development would occur downtown following pedestrian-oriented design principles. In general, there would be a greater focus on design of buildings and the streetscape. The land use patterns of areas outside the central city would remain largely the same.

**Location:** The City of Spokane Planning Area includes the area within the Spokane city limits, “joint planning areas” identified in Spokane County’s Interim Urban Growth Area, and areas adjacent to the city limits that have the potential to be annexed in the future and are proposed to be included in the city’s final Urban Growth Area. The size of the planning area varies with each alternative described above.

**Proponent:** The City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, Washington 99201-3329

**Lead Agency:** The City of Spokane Planning Services Department

**Responsible Official:** John Mercer, Director, Planning Services Department

**Comprehensive Plan/EIS Contact Person:** Leroy Eadie (509-625-6187) or  
Jo Anne Wright (509-625-6017)

**Permits and Approvals Required:** City Council adoption, by ordinance or resolution, of the Comprehensive Plan goals, policies and implementation strategies, a land use map, and interim development regulations.

Adoption of the Final Urban Growth Area by the Spokane County Board of Commissioners.

**Date of Plan Commission Recommendation:** January 17, 2001

**Date Final EIS Issued:** March 23, 2001, 5:00 p.m.

**Hearings on the Recommended Comprehensive Plan:**

Remaining City Council Hearings are scheduled for 6:00 p.m.  
March 26, 2001 and April 2, 2001  
in the City Council Chambers,  
Lower Level City Hall  
West 808 Spokane Falls Boulevard  
Spokane, Washington 99201-3329

**Location of Review Copies of the Comprehensive Plan/EIS and Background Information:**

City of Spokane Planning Services Department  
West 808 Spokane Falls Boulevard, Room 200  
Spokane, Washington 99201-3329

Review copies are also available at City of Spokane Public Libraries.

The Comprehensive Plan and EIS may also be reviewed on the City of Spokane’s website at [www.spokanecity.org](http://www.spokanecity.org).

**Cost per Copy of Final EIS:** Cost of reproduction for hard copy.

**Subsequent Environmental Review:** The City is using phased environmental review under WAC 197-11-060(5) and 197-11-228(2)(b) to meet the requirements of the State Environmental Policy Act. Following adoption of the Comprehensive Plan (goals, policies, land use map, and implementation strategies) and initial development regulations, more detailed regulations and programs to implement the plan will be developed. Appropriate review pursuant to SEPA will be conducted for these actions. Additional environmental review will also be conducted for future project proposals which implement the comprehensive plan (e.g., public facilities) and for neighborhood plans that provide more detailed planning and implementation guidance.

**Principal Authors of the Environmental Impact Statement:**

City of Spokane Planning Staff, Growth Planning Section – background information.

Huckell/Weinman Associates, Inc – principal author; land use; policy consistency; population and housing; economic development; natural environment.

Ramm Associates – sewer and water.

Transpo - transportation

# 1. FINAL EIS PROJECT DESCRIPTION AND ENVIRONMENTAL SUMMARY

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## Introduction

This final environmental document has been prepared in compliance with the requirements of the State Environmental Policy Act (RCW 43.21C) and implementing regulations (WAC 197-11). It contains a description of alternatives, including a modified land use plan and policies that have been recommended by the Spokane Plan Commission; a summary of environmental impacts and mitigation measures; supplemental discussion of environmental impacts associated with the Plan Commission's Recommendation; and responses to comments received on the Draft Plan/EIS that addressed environmental or SEPA issues.

The City of Spokane, along with Spokane County, has been implementing early, integrated planning and environmental review to meet its requirements under the Growth Management Act since 1995. Integration is intended to make consideration of environmental issues an early and integral part of development of plan policies, alternatives, and implementation before commitments are made to a specific course of action. The city and county have prepared and considered a number of issue papers, and formal and informal environmental documents that have evaluated the choices and steps available to the city and the region to meet their GMA requirements.

Following the procedures set forth in the SEPA Rules (WAC 197-11-210 et seq.), the city released an integrated Draft Comprehensive Plan/Draft EIS on May 22, 2000. In addition to paper copies, it was available on the city's website and as a CD-ROM to promote circulation and reduce document costs. Interested agencies, tribes and citizens were provided a 127 day period in which to review and comment on the Draft Plan and Draft EIS. During this period, city staff met with roughly 80 civic groups and attended nine community festivals to discuss the contents of the Plan/EIS.

The city's program for informing and involving the public was extensive and multi-faceted. A summary of the Plan/Draft EIS (*Spokane Quest*) was prepared and distributed widely (15,000 copies) through a variety of means. Numerous articles on the Draft Plan appeared in corporate, agency and association newsletters, in local newspapers and on local radio and television stations. Displays and posters were created, and information was available through the city's website and hotline. Open houses and meetings were hosted by the City Council, the Plan Commission and/or organized by city staff.

A total of 135 comment letters were received on the Draft Plan/Draft EIS during the formal comment period; an additional 134 were received after the close of the comment period. The great majority of comments (approximately 98 percent) addressed specific features of a plan alternative or land use map, draft plan policies or procedures, or expressed the writer's opinion or preference regarding an alternative. Commentors generally favored the Centers and Corridors alternative. A very small number of comment letters (five) raised issues germane to the Draft EIS and/or specific to environmental impacts. These latter comments are addressed in the Final EIS.

Following the 127 day comment period, the Plan Commission began meeting weekly to discuss plan alternatives and public comments. In the course of its work with the Plan Commission, city staff addressed the issues raised in comments and public testimony. This is documented in the transcripts of those meetings.

The first round of review addressed comments related to policies specific to the Centers and Corridors alternative. This was followed by a review of the comments addressing policies not specifically related to a particular growth alternative. Finally, the Plan Commission considered public comments that raised new issues, and transformed many of those into additions and changes to the draft comprehensive plan. Once all final edits had been approved, the Plan Commission began the new year with a review of land use map

designations, urban growth area proposals, land capacity methodology, and SEPA analysis. All this was done prior to their confirmation of Centers and Corridors as the Preferred Growth Alternative.

The Plan Commission signed Findings and Conclusions on January 17, 2001, that urge the City Council to adopt the Plan Commission's recommended version of the comprehensive plan, including the Centers and Corridors growth alternative. These Findings state that their recommendation is based on the Plan Commission's extensive review of oral and written public comment, as well as their consideration of environmental, fiscal, market, social, and operational evaluations of the three proposed growth alternatives.

Responses to most comments on the plan have occurred within the context of the City of Spokane's process for developing a recommendation to the City Council. This Final EIS contains additional responses to comments that raised questions specifically concerning environmental impacts.

Most of the plan changes being recommended by the Plan Commission to the City Council were published in mid-February, 2001. This Final EIS summarizes and addresses the environmental implications of those recommended changes.

### **Proposed Action**

The action proposed by the City of Spokane is adoption of a new comprehensive plan to conform to the requirements of the Growth Management Act. The action addressed in this Final EIS consists of two related elements:

1. Adoption of policies in the Comprehensive Plan organized in specific elements or chapters.
2. Adoption of a generalized land use map showing the location of various land uses.

The Draft Plan/EIS evaluates four alternatives in addition to No Action: Current Patterns, Mixed-Use Centers and Corridors, Central City, and an alternative recommended by the Plan Commission. The alternatives would distribute future growth somewhat differently throughout the city and its UGA, but all would accomplish the objective of complying with the GMA. The Plan Commission recommendation is substantially the same as the Centers and Corridors alternative. Differences are minor and summarized and evaluated later in this Final EIS.

The city's action, adoption of a new Comprehensive Plan, will not involve direct changes to the use of land; it will provide a policy and regulatory framework within which future growth will occur. Actions to implement the plan, including adoption of a zoning map, development regulations, incentives, and financing programs, will occur as a subsequent phase of GMA compliance.

## **Growth Management Act Requirements**

### **Planning Goals, Plan Elements, and Countywide Planning Policies**

The Growth Management Act (GMA), enacted in 1990, contains a comprehensive framework for managing growth and coordinating land use with infrastructure. The GMA's general planning goals include the following: directing growth to urban areas, reducing sprawl, providing efficient transportation systems, promoting a range of residential densities and housing types and encouraging affordable housing, promoting economic development throughout the state, protecting private property rights, ensuring timely and fair processing of applications, maintaining and enhancing resource-based industries, encouraging retention of open space and habitat areas, protecting the environment, involving citizens in the planning process, ensuring that public facilities are provided at adequate levels concurrent with planned development, and preserving lands with historic and archaeological significance.

Local comprehensive plans must contain specific elements or chapters addressing land use, housing, capital facilities, utilities, rural lands (counties only), and transportation. Optional elements being addressed by the city include economic development, urban design and historic preservation, the natural environment, social

health, neighborhoods, parks, recreation, and open space, and leadership, governance, and citizenship. Sub-area or neighborhood plans are also authorized and must be consistent with the GMA's general goals.

### **Urban Growth Areas**

Counties are given the responsibility of designating "urban growth areas" (UGAs) in their comprehensive plans. These are areas already characterized by or adjacent to areas characterized by urban growth and within which future urban growth will be encouraged. Services and facilities must be currently available or planned to be available. All cities must be within an urban growth area. Unincorporated lands contained within urban growth areas must be urban in character or adjacent to such lands. A region's designated urban growth areas must be large enough and planned housing densities high enough to accommodate the next 20 years of population growth forecast by the state. Lands outside the UGA are to be maintained and used for rural activities or for long-term commercial natural resource activities (agriculture, forestry, or mineral extraction).

Adoption of a UGA is a two-step process. An "interim urban growth area" (IUGA) must be adopted initially, prior to completion of local comprehensive plans. A "final urban growth area" is established in conjunction with adoption of a county's comprehensive plan. Cities may propose UGAs outside their corporate boundaries; these UGAs must satisfy Growth Management Act requirements regarding population forecasts, land use character, land supply and demand, and availability of public services and capital facilities. Intergovernmental consensus and agreements are used to establish the urban growth area boundaries; a dispute resolution process is also authorized.

The Spokane County Board of County Commissioners designated interim urban growth areas (IUGAs) and adopted interim development regulations in April 1997. Population allocations for those IUGAs were revised in May 1999; the boundaries of the IUGAs were not changed, however.

In December 1999, Spokane County notified all cities and towns that it was considering adoption of a revised Comprehensive Plan and a Final Urban Growth Area. It requested that any jurisdiction wishing to change its interim urban growth boundaries notify the county and provide supporting data. The City of Spokane submitted a request for an expanded UGA along with the requested information in January 2000. As of this writing, the regional Steering Committee, which makes recommendations regarding UGAs and other GMA matters, has not made a recommendation concerning the city's expanded UGA. The city has used the proposed, expanded UGA boundary as the basis for its comprehensive plan alternatives and for the plan recommended by the Plan Commission.

### **Capital Facilities, Utilities, and Transportation**

Local comprehensive plans must include an inventory of existing capital facilities and utilities and an estimate of future needs based on the 20-year growth projection. This includes a consideration of the balance between estimated costs and revenues to support needed services and facilities at adopted levels of service. Comprehensive plans must contain a provision to reassess planned land use if anticipated funding falls short of estimated needs and other financial or level of service solutions fail to remedy the problem.

Capital facility and transportation planning requirements include an inventory of existing facilities, adoption of level of service standards, an assessment of need, an evaluation of revenues likely to be available to meet needs, a six-year financing plan, a requirement that improvements be provided or assured "concurrent" with development or that development be denied, and a policy to reassess the land use element if projected funding falls short of needs.

### **Plan Implementation**

Implementation refers to measures, programs, and systems that make the Comprehensive Plan work. The Growth Management Act requires that jurisdictions adopt development regulations, such as zoning, that are consistent with and carry out the Comprehensive Plan's policies and objectives. Similarly, the plan's

capital facilities and transportation elements, adopted levels of service, functional plans (such as for parks), and annual capital budgeting process will help ensure that services and facilities are coordinated with growth. In addition, growth and change will need to be monitored to ensure that targets and expectations are being achieved.

The City of Spokane is taking a phased approach to implementation. An initial development regulation package with the essential tools necessary to implement the Comprehensive Plan will be adopted following adoption of the plan. A detailed work program will be developed to identify the timing and responsibilities for additional implementing tools.

## **Environmental Review Process**

### **Phased Environmental Review**

The City of Spokane is conducting phased review of its GMA-mandated actions (WAC 197-11-060(5), 197-11-228 (2)(b)). Phasing of environmental review helps decision-makers and the public to concentrate on environmental issues that are clearly defined and ready for decision, while deferring others where additional information is needed to bring them into sharper focus. Phased environmental review generally progresses from decisions that are very broad and general in scope, such as an urban growth area or a comprehensive plan, to those that are narrower in scale, such as neighborhood plans. Each step builds on and adds to prior information without duplicating what has gone before.

### **SEPA/GMA Integration**

In 1995, Spokane County, the City of Spokane, and other cities and towns in the region received a grant from the Department of Community, Trade, and Economic Development (CTED) that was intended to: (1) initiate environmental review of its GMA decisions at the earliest steps in the planning process, (2) more fully integrate the planning process with SEPA compliance, and (3) support development of a Geographic Information System (GIS) to enable informed planning decisions. The process was based on new SEPA provisions (WAC 197-11-210) designed to better integrate SEPA review with GMA planning. Integration uses SEPA processes and documents to help develop alternatives and proposals that are responsive to environmental conditions.

The integration project resulted in several issue papers that contained programmatic environmental information and guidance for the cities' and county's planning activities. Among others, these included an issue paper for the City of Spokane (Land Use, Critical Area, and Capital Facilities, 1997) that identified a menu of potential mitigation measures and implementation programs to address future growth-related impacts. These documents were prepared consistent with the SEPA rules' provisions for preliminary planning and environmental analyses (WAC 197-11-232 through 235).

The May, 2000 Draft Plan/Draft EIS was an integrated plan/SEPA document prepared pursuant to the SEPA rules (WAC 197-11-210 et seq). This Final EIS is being published as a more traditionally organized environmental document; it contains all the information required by SEPA for an Final EIS. It will provide the City Council with information about the environmental consequences of the Plan Commission's recommendation, in addition to the alternatives considered in the Draft Plan/Draft EIS. As noted previously, most comments received on the plan did not raise environmental issues and were addressed during the Plan Commission's hearing and deliberation process.

SEPA allows the consideration of new or modified alternatives in Final EIS documents (WAC 197-11-560(1)). Modifying or creating alternatives is one permitted means of responding to prior comments. It is also consistent with the purpose and approach of the city's integrated planning/environmental review process.

## Comprehensive Plan/Final EIS Alternatives

The Comprehensive Plan alternatives do not reflect a radical departure from existing land use patterns. Three of the alternatives, Mixed-Use Centers and Corridors, the Plan Commission’s Recommended Plan, and Central City, focus and concentrate a portion of future population growth in identified sub-areas. The No Action and Current Patterns alternatives more evenly disperse future growth throughout the proposed urban growth area. The Plan Commission’s Recommended Plan is substantially the same as Centers and Corridors.

Major factors considered in the alternatives include the following:

- ◆ Population Growth: All alternatives plan to accommodate a population increase of approximately 68,800 people through 2020. This target reflects a change, adopted by the Board of County Commissioners in 1999, that reallocated approximately 10,000 in population from the Joint Planning Areas to unincorporated urban growth areas.
- ◆ Land Use: The range of alternatives embody a similar overall land use pattern and mix of land uses. The table below shows each major land use and the percentage of land area it occupies relative to the UGA as a whole. The range among the alternatives is relatively small.

<b>TABLE 1 LAND USE AND PLANNING AREA PERCENTAGES</b>	
<b>Land Use</b>	<b>Percentage of Planning Area</b>
<b>Residential</b>	56-57%
<b>Industrial</b>	30-31%
<b>Open Space</b>	9%
<b>Institutional</b>	1.7-2.3%
<b>Retail</b>	0.4-1%
<b>Office</b>	0.3-0.9%
<b>Mixed-Use</b>	0-1.3%

Under any scenario, housing would remain the dominant land use in the city.

- ◆ Housing Mix and Density: The balance between single-family and multi-family housing would vary with each alternative. Based on GIS data, single-family housing would range from 75 percent of the total, approximately the same as at present, to 59 percent. Multi-family housing, including mixed-use development, would correspondingly range from a low of 25 percent, approximately the same as at present, to 41 percent of the total.

Average gross densities for new development in the Current Patterns, Mixed-Use Centers and Corridors, and Central City alternatives would generally range from just over 4 du/acre for single-family to 12 du/acre for multi-family. Average net densities for new development, pending the results of refined land quantity analysis, could be higher. Densities would be significantly higher in identified centers and downtown. Net densities for No Action could be 8 to 15 du/acre citywide.

- ◆ Downtown: Under all alternatives, downtown Spokane would remain the economic and cultural center for the region but has a more significant role under the two focused growth alternatives.
- ◆ Employment: All alternatives plan for approximately the same number of new jobs (approximately 27,700-28,000) through the year 2020.
- ◆ Urban Growth Area: The No Action alternative generally assumes continuation of the existing Interim Urban Growth Area for the city that was adopted in 1996, consisting of 50,897 acres. This includes lands within the city’s existing boundary (36,598 acres) plus unincorporated joint planning areas (14,299 acres). This is the smallest UGA of the alternatives.

All other alternatives assume a larger UGA, adding 13,611 acres to the IUGA boundary for the Central City and Centers and Corridors alternatives, and 14,852 acres to the IUGA boundary for the Current Patterns alternative. The Plan Commission's Recommended Plan would add approximately 18 acres more than Centers and Corridors. The Regional Steering Committee of Elected Officials and the Spokane County Board of Commissioners will consider the city's request for an expanded UGA boundary.

- ◆ Capital Facilities Program: Levels of service for public facilities and city services would be adopted under any of the alternatives. A six-year capital improvement program would also be adopted. The city would not extend services or facilities outside the designated UGA.

### **No Action**

No Action assumes continuation of the Interim Urban Growth Area adopted in 1996. It encompasses 50,897 acres (36,598 within the city and 14,299 acres in joint planning areas). As described previously, the city is proposing to expand its UGA, and the other Plan/DEIS land use alternatives are based on larger UGAs. No Action provides a basis for comparing impacts associated with these larger UGAs.

The mix of land uses and the overall land use pattern would generally be the same as Current Patterns, described below. However, residential densities would have to increase significantly to accommodate the 20-year population target (68,800) within this smaller area. Based on preliminary land quantity analysis, the net average density of new housing would be in the range of 8 to 15 du/acre.

### **Current Patterns**

The city's Urban Growth Area would consist of 65,749 acres. This is the largest of the UGAs examined, approximately 1,241 acres larger than Mixed-Use Centers and Corridors and Central City and 14,852 larger than No Action. Additional areas included in this alternative's UGA are: East Hillyard (61 acres), Fairwood/Farwell (5,567 acres), Gleneden (1,881 acres), Kaiser Industrial (2,927 acres), Linwood (1,997 acres), McKay Manufacturing Home Park (17 acres), Moran/Glenrose Extension (19 acres), Morgan Acres (747 acres), the Murfield Annexation (46 acres), Park West (492 acres), Riverside State Park (492 acres), Seven Mile (723 acres), Shawnee Canyon (17 acres), South Five Mile (1,240 acres), and West Plains Addition 1 (6 acres). The new areas would add additional capacity for residential development (8110 acres), industrial growth (5,277 acres), and open space (492 acres).

The Current Patterns alternative is comparable to No Action except for the expanded UGA. It assumes only those changes in planning policy required by GMA. Current land uses and land use patterns would continue over the next 20 years. Development would continue to move outward from the periphery of the city, Commercial and office uses would follow the same pattern, including development at arterial intersections and in strips along major transportation corridors.

New housing would consist of 75 percent single-family and 25 percent multi-family, which is approximately the same as current development patterns. Gross housing densities for new development would average 4 du/acre for single-family and 12 du/acre for multi-family. Average net densities would be higher, depending on refinement of the city's land quantity analysis. It is assumed that new housing in downtown will be limited.

Major transportation improvements assumed for Current Patterns include the North Spokane Limited Access Corridor but not the Monroe/Lincoln-Post/Wall one-way couplet. A high capacity transportation corridor between downtown and Liberty Lake would not be constructed within the planning horizon.

### **Mixed-Use Centers and Corridors**

The UGA for Mixed-Use Centers and Corridors is 64,508 acres, which is smaller than Current Patterns but larger than the IUGA. The UGA would be expanded pursuant to the process described previously.

This alternative would focus a portion of the projected growth at higher densities in planned, mixed-use activity centers of different scales (Neighborhood, District, and Employment ), and along existing transportation corridors. The centers, which would be designated on the Comprehensive Plan land use map, would include a mix of land uses, including high density residential, commercial, industrial, public and institutional, and open space; the uses and proportions of uses would vary by center. Downtown Spokane would remain the economic and cultural center of the region with an emphasis on new housing choices and services.

Housing would be approximately 59 percent single-family and 41 percent multi-family; this represents a significant increase in multi-family housing compared to Current Patterns. Relatively little change would occur in existing single-family neighborhoods. Outside centers, the average gross density of new development would be 4 du/acre for single-family and 12 du/acre for multi-family. Net densities could be higher, depending on the results of the city's refined land quantity analysis.

Higher density housing would be focused within or adjacent to centers to promote walking and transit. Gross housing densities in designated centers would average 15 to 32 in neighborhood centers, and 15 to 44 du/acre in district and employment centers. Medium density housing around centers (approximately 22 du/acre) would create a transition to lower density residential neighborhoods. Building heights would be limited to be consistent with the scale of the surrounding neighborhood. The centers would be designed to promote pedestrian movement.

The following centers and corridors would be designated on the Comprehensive Plan Land Use Map; additional centers could be designated in the future through a neighborhood planning process.

#### **Neighborhood Centers**

Would be located at Indian Trail and Barnes, 9th and Perry, Grand Blvd/12th to 14th, Garland District, Latah Creek, Camelot area, Broadway and Maple area, and Hamilton and Mission. Each would contain services and facilities to meet needs of the surrounding neighborhood. Each would be 15 to 25 square blocks in area.

#### **District Centers**

Would be located at Shadle – Alberta and Wellesley, Lincoln Heights – 29th and Regal, Fairgrounds, 57th and Regal, and Manito Center – 29th and Grand. These would serve the needs of a larger area and would contain a broader array of services. Each would be 30 to 50 blocks in area.

#### **Employment Centers**

Would be designated: Hillyard – Market and Wabash, East Sprague – Sprague and Napa, North Foothills, and Maxwell and Elm. Each would be 30 to 50 blocks in area.

#### **Mixed-Use Corridor**

Would also be designated along Monroe, between downtown and Garland. Development mix and densities would be comparable to district and or employment centers.

Increased levels of transit service would occur. The Mixed-Use Centers and Corridors alternative assumes development of the North Spokane Limited Access Corridor but not the Monroe/Lincoln-Post/Wall one-way couplet, and high capacity transportation corridor between downtown and Liberty Lake. Light rail or express buses would be planned to travel through several mixed-use centers

#### **Central City**

The UGA for the Central City alternative would be 64,508 acres, the same as for Mixed-Use Centers and Corridors. The UGA would be expanded pursuant to the process described previously. Downtown Spokane would remain the economic and cultural center of the region. The downtown is generally defined as Boone Avenue on the north, I-90 to the south, Division Street on the east, and Maple Street/Riverside Avenue/Monroe Street on the west.

Relatively more growth (new development and redevelopment) would be focused in and around downtown (including the West Central/Summit and South/Southwest neighborhoods) at higher densities. Compact, higher density mixed-use development would occur downtown, following pedestrian-oriented design principles. In general, there would be a greater focus on design of buildings and the streetscape.

Some concentrations of higher intensity growth would also occur along major transportation corridors. The land use patterns of areas outside the central city will remain largely the same. Slightly fewer housing units would be developed compared to Mixed-Use Centers and Corridors. Housing would be 64 percent single-family and 36 percent multi-family. Approximately 3,800 new multi-family units would be developed downtown at a density of 145 du/acre. Gross densities for new development outside downtown and central city sub-areas would be 4.2 for single-family and 12 du/acre for multi-family housing; average net densities would be higher.

Increased levels of transit service and pedestrian and bicycle facilities would be planned. A pedestrian/bicycle system would be constructed to link downtown, adjacent neighborhoods, and the Spokane River. Planned improvements include high capacity transportation between downtown and Liberty Lake employing light rail or express bus. The North Spokane limited access corridor and one-way couplet system are not included.

### **Plan Commission Recommendation**

The Plan Commission's Recommended Plan is substantially the same as the Mixed-Use Centers and Corridors alternative. Key similarities and differences are highlighted below.

The UGA would be approximately 18 acres larger than Centers and Corridors. Based on updated land quantity analysis, the UGA could accommodate a population of approximately 77,967, which is 9,167 more than the current allocation (68,800). There would also be small surpluses of industrial land (205 acres), and commercial land (approximately 431,000 square feet or 33 acres). Note that these surpluses are based on a conservative approach to calculating land capacity, and does not include use of a safety factor (typically 25 percent).

A portion of growth would be focused in higher-density, mixed-use activity centers of different scale designated on the land use map. Larger centers (District and Employment) would be approximately 20 percent high density housing and 30 percent commercial office, while smaller Neighborhood centers would be planned as approximately 40 percent high density housing and 20 percent commercial/retail. The ultimate mix of uses would be determined in a more site-specific planning process, based on consideration of infrastructure/road capacity, natural conditions and similar issues. The number and location of Employment Centers and Neighborhood Centers would change somewhat relative to Centers and Corridors. New Employment Centers would be designated at Holy Family – Franklin Park Mall area, KHQ on South Regal, and North Nevada, between Westview and Magnesium. An Employment center would not be designated at Hillyard – Market and Wabash. Two new Neighborhood Centers would be designated at Lincoln and Nevada, and Fort George Wright Drive and Government Way. The Latah Creek and Camelot area Neighborhood Centers would not be designated. District Centers would be the same as for Centers and Corridors. Additional centers would be designated in the future through a neighborhood planning process.

Housing would be approximately 65 percent single-family and 35 percent multi-family; this housing mix is comparable to the Central City alternative. Relatively little change would occur in existing single-family neighborhoods; land use designations for these areas would be changed (primarily to Residential 4-10) to minimize future change and potential land use conflicts, and to enhance the development potential within designated mixed-use centers and corridors. Gross densities for new development outside centers would average 4.8 du/acre for single-family and 17 du/acre for multi-family development. Higher densities would be focused in and around designated centers.

Increased levels of transit service would occur. Like the Mixed-Use Centers and Corridors alternative, the Plan Commission Recommended Plan assumes development of the North Spokane Limited Access Corridor but not the Monroe/Lincoln-Post/Wall one-way couplet, and high capacity transportation corridor between downtown and Liberty Lake. Light rail or express buses would be planned to travel through several mixed-use centers

Recommended changes to plan policies and the land use map are discussed in Section 2.

### **Environmental Summary**

This subsection consists of the summary of major conclusions and key differences among the land use alternatives. The relative impacts of the Plan Commission's Recommended Plan is included. Table 2, on the following page, summarizes environmental impacts. This is followed by a summary of mitigation measures and unavoidable adverse impacts.

## **2. NEW INFORMATION AND SUPPLEMENTAL ANALYSIS FOR THE PLAN COMMISSION’S RECOMMENDED PLAN**

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The plan alternative recommended by the Plan Commission is substantially the same as the Mixed-Use Centers and Corridors alternative contained in the Draft EIS. Major map and policy changes recommended by the Planing Commission are summarized and evaluated in this section.

### **A. Summary of Plan Commission’s Recommended Changes**

#### **1. Changes to Draft Comprehensive Plan Policy**

The following narrative summarizes major policy changes proposed by the Plan Commission. In general, most changes to draft Comprehensive Plan policies recommended by the Plan Commission are intended to clarify or emphasize certain aspects of policy statements and do not fundamentally change the substance of the policy. Further, most recommended changes occur in the narrative supporting the policy, rather than in the language of the policy itself. These types of editorial changes, as well as changes that deal strictly with procedural questions, do not raise environmental issues.

#### **Land Use**

LU 1.4 Emphasizes that all higher density residential uses are to be limited to designated centers and corridors and precluded in other areas.

LU 1.5 Emphasizes that new office uses should be limited to designated centers and corridors and precluded outside centers.

LU 1.7 Clarifies that new mini-centers may be established and designated on the land use map through a neighborhood planning process.

LU 1.10 Emphasizes that retail and non-industrial uses should not be primary in industrial zones.

LU 1.11 Clarifies that uses adjacent to designated agricultural lands, whether inside or outside the City, should be compatible with farm uses.

LU 3.1 Emphasizes that future growth should be directed to locations where adequate services and facilities exist or can be extended economically.

LU 4.1 The discussion reiterates GMA policy requiring consistency between the land use and transportation elements of the plan, and to reassess land use if probable funding falls short.

LU 6.7 Deletes the recommendation that large developments provide school sites to mitigate school impacts.

LU 8.4 Requires that land supply be monitored regularly to ensure that it is adequate to accommodate forecast growth.

LU 9/9.6 Emphasizes that the city should have fiscal capacity to provide services to proposed annexation areas. The discussion indicates that property owners should generally fund improvements to meet city level of service standards or to correct existing health and safety deficiencies.

LU 12 Deletes policy regarding identifying urban reserve areas.

#### **Transportation**

TR 4.20 Articulates design principles for right-of-way streetscape elements.

TR 4.21 Delegates maintenance responsibility for streetscape elements to adjacent property owners and/or neighborhood unless the city specifically assumes responsibility.

TR 9.3 Requires the city to dedicate a portion of its annual transportation capital budget to retrofit the street system to meet pedestrian design standards.

### **Capital Facilities**

CFU 11.1 Revises level of service standards for law enforcement (deletes capital facility portion), and recycling and solid waste (1 collection per week). Adds a standard for stormwater (10 year design storm, 25 year/24 hour storm, and 100 year storm).

CFU 2.1 Revises policy and discussion regarding concurrency and adequacy of facilities to require that water, sewer and solid waste facilities be in existence at the time of occupancy and use, and that a financial commitment is in place at time of development approval for all other public services within 6 years.

CFU 2.2/2.6 Expresses first priority as to scale back land use rather than to reduce levels of service, if facility funding falls short.

CFU 2.4 Includes impact fees as one alternative to be considered, rather than required, to fund capital improvements.

CFU 3.5 Would apply city standards for land use, engineering and services throughout the City of Spokane's UGA, regardless of governing jurisdiction.

CFU 3.6 Limits extensions of city services outside the UGA to specified conditions (i.e., existing system with sufficient capacity, a public health or safety threat determined by the Regional Health District, or a previously vested development). Any service extensions must consider cumulative impacts, cannot be used to support the county's rural population allocation, and cannot induce inappropriate types or levels of growth.

### **Housing**

H 2.3 Limits accessory housing units to one per owner-occupied single-family unit in residentially designated areas.

### **Economic Development**

ED 2.1 Expresses the need to ensure adequate land supply for locating a range of living-wage, environmentally compatible employment uses. Expresses desire to seek funding to provide services for designated employment land, and to explore potential areas for city-initiated SEPA Planned Actions as a means to attract new employment.

### **Natural Environment**

NE 5.7 Deletes policy that would discourage major facilities that degrade the region's air quality.

NE 11.1 Deletes policy that requires consideration of economic, environmental and social equity impacts when recruiting jobs and approving major economic activities.

### **Neighborhoods**

N 4.4 Revises language to clarify that the size of neighborhood business uses should be scaled to the size of the neighborhood it serves so as to help minimize non-local through traffic.

N 8 Clarifies that the city's intent regarding neighborhood planning is to implement the comprehensive plan through center plans and UGA plans, and through a neighborhood assessment process that will determine what further planning is necessary within each neighborhood.

N 8.2 The city will look for opportunities to conduct a pilot planning process within one or more designated centers/corridors.

N 8.7/8.8 Calls for the City of Spokane, Spokane County, and affected neighborhoods and stakeholders, to agree to a process for UGA planning prior to commencing neighborhood planning within the unincorporated portions of the city's UGA.

## **2. Changes to Centers and Corridors Alternative Land Use Map**

**UGA Boundaries.** The proposed UGA in the Plan Commission's Recommended Plan is slightly larger by approximately 20 acres than the UGA in the Centers and Corridors alternative. This modification reflects removal of two parcels totaling slightly more than 50 acres, and the addition of two parcels (35.4 acres residential, and 33.3 acres of commercial), and some adjustments to right-of-way.

**Mixed-Use Centers.** The number and location of centers is changed slightly relative to the Centers and Corridors alternative. Please refer to the description in Chapter 1 of the Final EIS.

**Land Use Category/Density Changes.** The Plan Commission's Recommended Plan would modify the land use designation for existing single-family neighborhoods designated Residential 10-20. These would be changed to Residential 4-10. The reduction in density is intended to minimize future change, and potential impacts, in existing neighborhoods, and would be off-set by increases in density in designated mixed-use centers and corridors.

**Mineral Resources.** A new mining designation is reflected on the land use map. These mineral lands were previously designated as Industrial (which conditionally allows mining).

## **B. Environmental Issues and Analysis**

In general, the Plan Commission's Recommended Plan does not raise any new environmental impacts that are significantly different in type or degree than those described for the Centers and Corridors alternative. Differences would be incremental.

The Initial Development Regulations would modify the Spokane Zoning Code so as to apply the land use designations and policies of the Comprehensive Plan. In general, the impacts of the regulations would be the same as those associated with the plan alternatives, which are the subject of the Draft and Final EISs. Further environmental review will be performed, as necessary, as the IDR's are discussed and/or fine-tuned.

### **Land Use**

The Plan Commission's recommended plan and land use map would not significantly change the land use pattern or impacts reflected in the Mixed-Use Centers and Corridors alternative as identified in the Draft Plan/EIS. Land uses are shown for the EIS alternatives in Table 2 below and generally reflect incremental differences between the Plan Commission Plan and the Centers and Corridors Alternatives. Changes relative to Centers and Corridors include the following:

- ◆ *reduces* residential land (- 575 acres, primarily single-family and two-family)
- ◆ *increases* land for retail uses (+ 62 acres, )
- ◆ *increases* office land (+ 52 acres)
- ◆ *reduces* industrial land (- 291 acres, primarily reflecting a new mining designation)
- ◆ *increases* open space (+ 143 acres)
- ◆ *increases* institutional uses (+ 370 acres)

Note that these figures are gross acres, and do not reflect various land quantity deductions. The UGA would be expanded by approximately 18 acres relative to the Centers and Corridors alternative.

Single-family residences would remain the predominant land use in the city (approximately 56 percent of the land area, compared to 57 percent for Centers and Corridors). Recommended changes to other land use categories are within fractions (less than 1 percent) of the Centers and Corridors alternative.

Like the Centers and Corridors alternative, the Plan Commission Recommendation would focus a portion of future growth in designated high density, mixed-use centers and along transportation corridors. Minor changes to the number and location of centers would occur relative to Centers and Corridors, but this would not significantly alter the planned land use pattern or the impacts identified in the Draft Plan/EIS.

Both the Plan Commission's Recommended Plan and the Centers and Corridors alternative would involve redesignation of residential lands within existing single-family neighborhoods. Most neighborhoods that are currently designated Residential 10-20 would be lowered to single-family 4-10. The development capacity of these areas would, therefore, be commensurately reduced. Affected areas are currently developed, and the amount of land considered likely to redevelop is limited. While this redesignation would reduce the development potential, and possibly the monetary value, of affected single-family properties, it would also reduce the potential for adverse impacts associated with land use conflicts due to future contrasts in density as a result of redevelopment at higher densities.

The redevelopment capacity of these existing neighborhoods is being shifted, in effect, to designated mixed-use centers and corridors. This compensating increase in density in designated centers is intended to foster growth in a more compact, higher density development pattern and particularly in locations that can be efficiently served by transit and where pedestrian and other non-motorized modes of transportation can provide alternatives to auto use.

Proposed policies provide clearer direction that higher density multi-family residential and office uses would be limited to designated centers and corridors and precluded in other areas. This would help to reduce potential land use conflicts and incompatibilities.

The small additions to the City of Spokane's UGA recommended by the Plan Commission would not entail land use impacts that are different in type or degree from those identified in the Draft Plan/EIS for the Centers and Corridors alternative.

The Initial Development Regulations would modify existing zoning requirements to advance the planned land use pattern. They would modify dimensional standards -- such as setbacks, minimum lot sizes and building heights -- for residential and business zoning classifications to reflect the density requirements of proposed land use map designations. Other proposed changes would help reduce environmental impacts (e.g., shielding of lighting) and/or begin to foster positive changes to the appearance and livability of neighborhoods (e.g., billboard limitation). Proposed modifications of permitted uses are also intended to enhance land use compatibility.

**TABLE 2 FUTURE LAND USE SUMMARY (GROSS ACRES OF LAND)**

Land Use Alternative				
Land Use Category	Current Patterns	Centers and Corridors*	Plan Commission Recommended Plan	Central City
<b>Residential Total</b>	<b>36,940</b>	<b>36,690</b>	<b>36,116</b>	<b>36,520</b>
Single-Family, Residential 4 - 10	31,990	34,700	34,280	34,320
Multi-family, Residential 15+, Residential 15 - 30	3,560	1,670	1,689	1,725
Two-Family, Residential 10 - 20	1,400	320	146	470
<b>Retail Total</b>	<b>730</b>	<b>245</b>	<b>307</b>	<b>445</b>
Neighborhood Business	235	60	126	70
Community Business	500	0	0	195
Neighborhood Mini-Center	0	180	181	180
<b>Office Total</b>	<b>170</b>	<b>525</b>	<b>577</b>	<b>335</b>
<b>Mixed-Use Total</b>	<b>840</b>	<b>0</b>	<b>0</b>	<b>685</b>
<b>Industrial Total</b>	<b>20,300</b>	<b>19,760</b>	<b>19,469</b>	<b>19,260</b>
Light Industrial	11,970	11,915	11,752	11,915
Heavy Industrial	4,520	4,490	4,560	4,330
General Commercial	3,815	3,350	3,157	3,015
<b>Open Space Total</b>	<b>5,660</b>	<b>5,680</b>	<b>5,823</b>	<b>5,680</b>
Conservation Open Space	2,710	2,705	2,688	2,705
Active Open Space	2,535	2,555	2,657	2,555
Potential Open Space	420	420	478	420
<b>Agriculture</b>	<b>**</b>	<b>**</b>	<b>144</b>	<b>**</b>
<b>Mining</b>	<b>**</b>	<b>**</b>	<b>217</b>	<b>**</b>
<b>Institutional Total</b>	<b>1,100</b>	<b>1,100</b>	<b>1,471</b>	<b>1,100</b>
<b>Downtown Total</b>	<b>0</b>	<b>515</b>	<b>540</b>	<b>480</b>
<b>Total</b>	<b>65,750</b>	<b>64,510</b>	<b>64,674</b>	<b>64,510</b>

Source: City of Spokane, 2000, 2001. Totals may not add due to rounding. Some changes between Centers and Corridors and the Plan Commission Recommended Plan also reflect a refinement of GIS data.  
 \* The Centers and Corridors alternative and the Plan Commission Recommended Plan include areas designated as mixed-use "centers" that will include acreage from the residential, retail and office categories.  
 \*\* For calculation purposes, Agriculture and Mining land uses were included in different categories in the Draft Plan/EIS alternatives.

### Population, Housing and Employment

The Plan Commission's Recommended Plan would provide capacity for a population of 77,967 and 36,043 total housing units. This is approximately 9,167 people greater than the city's population allocation of 68,800. Housing would be approximately 65 percent single-family and 35 percent multi-family. As shown in Table 3, this housing mix is comparable to the Central City alternative and is generally within the middle of the range of housing mixes reflected in the alternatives. As noted above, the city would remain predominantly residential in character.

**TABLE 3. HOUSING MIX BY ALTERNATIVE**

Alternative	Single-Family/percent	Multi-Family/ percent	Total
<b>No Action *</b>	28,551 75 percent	9,539 25 percent	38,090
<b>Current Patterns</b>	28,551 75 percent	9,539 25 percent	38,090
<b>Centers and Corridors</b>	21,548 59 percent	14,942 41 percent	36,491
<b>Plan Commission</b>	23,442 65 percent	12,601 35 percent	36,043
<b>Central City</b>	22,613 64 percent	12,484 36 percent	35,097

\* The 1998 mix of housing types in the City is 75 percent single-family and 25 percent multi-family.

The Plan Commission's recommended UGA would be approximately 18 acres larger than Centers and Corridors. Based on updated land quantity analysis, the UGA could accommodate a population of approximately 77,967, which is 9,167 more than the current allocation (68,800). This represents an approximate surplus of 482 acres (assuming an average net density of 7.6 dwelling units per acre and 2.5 persons per household). There would also be small surpluses of industrial land (205 acres), and commercial land (approximately 431,000 square feet, or 33 acres).

The estimated surpluses are based on a conservative approach to calculating land capacity, which does not include use of a safety factor. We now remove critical areas on vacant lands. A safety factor has been applied by almost all jurisdictions in the state when calculating their UGAs. Use of a safety factor, which is intended to reflect uncertainties regarding land supply and to provide a margin of safety, has also been upheld repeatedly by Growth Management Hearings Board decisions. Most jurisdictions have used 25 percent for most types of growth; a few Hearings Board decisions have upheld higher safety factors (e.g., 50 percent) for commercial or industrial growth. Use of a 25 percent safety factor for the City of Spokane would eliminate the above surpluses.

## **Transportation**

The policy revisions included in the Plan Commission Recommended Plan would not result in significant changes to the transportation impacts identified in the Draft Plan/Draft EIS for the Centers and Corridors alternative. As documented in that analysis, traffic-related differences among the alternatives are relatively small. In general, impacts are more sensitive to planned improvements to the transportation system (including transit) than to the relative land use pattern within the city.

## **Capital Facilities**

In general, capital facilities impacts of the Plan Commission's Recommended Plan would be substantially the same as those identified for the Mixed-use Centers and Corridors alternative. Several proposed changes, discussed below, raise GMA-related policy issues.

Recommended changes to Capital Facilities Element policies CFU 2.1, 2.2/2.6, and related plan text, would affect how the city implements concurrency. A concurrency requirement would apply to all public services and facilities. Adequate facilities for sewer, water and solid waste would be required to be actually present at the time of occupancy; for all other services, it is sufficient if a financial commitment is in place to provide the facilities within 6 years. The GMA (RCW 36.70A.070(6)) defines "concurrency" to mean that improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvement or strategies within 6 years. The GMA requires concurrency is only for a comprehensive plan's transportation element. The Plan Commission's recommendation would change both the definition of concurrency and the types of services it is applied to. The relationship of these changes to the GMA are questions of law and are beyond the scope of this EIS.

Proposed policy CFU 3.5 would apply City of Spokane standards for land use, engineering and services throughout the city's UGA, regardless of governing jurisdiction. This policy may be inconsistent with the joint planning process set forth in the Countywide Planning Policies for joint planning within UGAs (Policy Topic 2) and with provisions of Spokane County's Interim Development Regulations designating the IUGA (Section 3).

Proposed Policy CFU 3.6 would limit extensions of city services outside the UGA to narrowly defined conditions (i.e., health or safety threat, or a vested development). Extensions must consider cumulative impacts, cannot be used to support rural development, and cannot induce inappropriate types or levels of growth. This policy change is generally consistent with the policies of the GMA, the intent of Urban Growth Areas, and the purpose of Spokane County's interim development regulations implementing the adopted IUGA (Ordinance 97-0321).

## **Natural Environment**

A recommended policy change to Natural Environment policies would delete the Draft Plan's requirement (NE 2.4) that all developed property in the city and its UGA be sewerred to minimize aquifer contamination. This proposed change could, therefore, result in a potential increase in ground water pollution relative to the Centers and Corridors alternative. Other policy changes recommended by the Plan Commission would not result in impacts that are significantly different than those identified in the Draft Plan/EIS for the Centers and Corridor alternative.

The Plan Commission's recommended changes to the Comprehensive Plan land use map are relatively minor and would not produce impacts to the natural environment that are significantly different than those identified in the Draft Plan/EIS for the Centers and Corridors alternative.

<b>TABLE 4 SUMMARY OF IMPACTS</b>			
	<b>Current Patterns and No Action</b>	<b>Mixed-Use Centers and Corridors and Plan Commission Recommended Plan</b>	<b>Central City</b>
<b>Natural Environment</b>			
<b>Alternatives Generally</b>	<p>Any land use alternative will result in significant changes to the natural environment from the construction of housing and infrastructure, storm water runoff and human disturbance associated with future growth. The majority of land within the city's UGA will be cleared and used for urban development. Environmental resources subject to risk of direct and indirect impacts include numerous species of plants, animals, and fisheries (including threatened, endangered, and priority species and their habitat), water resources, wetlands, and air quality.</p> <p>The more dispersed land use pattern for Current Patterns would extend impacts over a relatively larger area. The high densities and geographic concentration associated with No Action would threaten all natural environmental resources in the urban area.</p>	<p>Impacts generally similar to Current Patterns and No Action.</p> <p>Focusing more growth in centers and corridors would help conserve existing resources to some degree. Open space and defined habitat corridors are protected.</p> <p>The Plan Commission Recommended Plan is generally comparable to Mixed Use Centers and Corridors.</p>	<p>Impacts similar to Centers and Corridors.</p> <p>Greater potential impacts to Spokane River riparian corridor in downtown sub-area due to more intensive development.</p>
<b>Air</b>	All alternatives would cause impacts to air quality from construction activities, wood burning, and especially automobile traffic. Based on regional modeling, traffic-related air quality impacts similar for all alternatives. Impacts are related more to regional transportation improvements than incremental changes to land use pattern. Current Patterns and No Action would generate highest amounts of CO annually.	Somewhat lower annual CO generation compared to Current Patterns and No Action.	Lowest annual CO generation.
<b>Ground Water</b>	All alternatives involve potential impacts to the Spokane Valley-Rathdrum Prairie Aquifer and ground water quality from increased impervious surfaces, reduced recharge, and the use, storage, and transport of chemicals and contaminants.	Impacts generally similar to No Action and Current Patterns.	Impacts generally the same as No Action and Current Patterns.
<b>Runoff/ Erosion/ Floods</b>	<p>Increased runoff volumes could cause localized flooding.</p> <p>Clearing and grading associated with construction can cause erosion, particularly in areas of steep slopes or geologic hazards.</p>	<p>Impacts generally the same as No Action and Current Patterns.</p> <p>Impacts similar for all alternatives.</p>	<p>Impacts generally the same as No Action and Current Patterns.</p> <p>Impacts similar for all alternatives.</p>
<b>Energy</b>	All alternatives will consume energy. Auto-dominated alternatives and greater amounts of single-family housing in Current Patterns and No Action will generally consume more energy for transportation and space heating.	Potential for reduced energy consumption from focusing growth in mixed-use centers, greater amounts of multi-family housing, reduced vehicle miles traveled and implementation of high capacity transit system.	Generally similar to Centers and Corridors.

**TABLE 4 SUMMARY OF IMPACTS continued page 2**

	<b>Current Patterns and No Action</b>	<b>Mixed-Use Centers and Corridors and Plan Commission Recommended Plan</b>	<b>Central City</b>
<b>Land Use</b>			
	<p>Most vacant and underdeveloped land consumed for urban uses to accommodate growth. Overall land use pattern relatively unchanged. Residential land uses will remain the dominant land use type, followed by industrial. Land use conflicts could occur between land uses of different type or intensity. Average densities similar to existing (6 du/acre net) for Current Patterns. For No Action, average net densities would need to be significantly higher (8 to 15 du/acre) to accommodate growth within smaller UGA.</p> <p>For Current Patterns, growth and land use change would be dispersed throughout the city and UGA, generally following the existing pattern. The larger UGA would spread urbanization over a larger area. No Action would also follow a dispersed pattern, but densities would be higher throughout the smaller UGA.</p>	<p>Land use impacts generally the same as Growth and change focused in designated mixed-use, pedestrian oriented centers of different scale, and in transportation corridors. Relatively less change would occur in other areas of the city; some densities would be reduced to help guide growth to centers. Smaller urbanized area relative to Current Patterns, but larger than No Action.</p> <p>Small increase (less than 20 acres) in the size of the UGA relative to Centers and Corridors. There would be small land capacity surpluses for residential (482 acres), commercial (33 acres) and industrial (205 acres) development if the city does not use a safety factor in its methodology. Use of a safety factor would eliminate these calculated surpluses.</p>	<p>Generally similar to Centers and Corridors. Greater emphasis on reinforcing downtown Spokane as regional center.</p>
<b>Population</b>			
	<p>All alternatives would accommodate a planned population increase of 68,800. Based on preliminary land quantity analysis, all alternatives contain sufficient vacant and redevelopable land to accommodate population target. Population growth dispersed throughout the city and UGA.</p>	<p>All alternatives would accommodate a planned population increase of 68,800. All alternatives contain sufficient developable land to accommodate the population target. Population growth would be more focused in designated centers/corridors; relatively little growth would occur in existing single-family neighborhoods.</p> <p>The Plan Commission Recommended Plan includes a surplus of residential land capacity, sufficient to accommodate 77,967 people (9,167 more than the target). The population surplus would be absorbed by density increases in centers, and/or could be categorized as a "safety factor" in terms of land quantity methodology.</p>	<p>All alternatives would accommodate a planned population increase of 68,800. Based on preliminary land quantity analysis, all alternatives contain sufficient developable land to accommodate population target. Population growth more focused in downtown sub-area; relatively little change in existing single-family neighborhoods.</p>

**TABLE 4 SUMMARY OF IMPACTS continued page 3**

	<b>Current Patterns and No Action</b>	<b>Mixed-Use Centers and Corridors and Plan Commission Recommended Plan</b>	<b>Central City</b>
<b>Housing</b>			
	<p>For No Action and Current Patterns, existing housing mix would continue – 75 percent single-family and 25 percent multi-family.</p> <p>Higher average net densities for No Action (8 to 15 du/acre) relative to other alternatives.</p>	<p>Greater amounts of multi-family housing (41 percent) relative to other alternatives. Greater opportunities for affordable housing.</p> <p>Average gross densities 4 du/acre for single-family, 12 du/acre for multi-family. Net density of new development approximately 6 du/acre. Higher density focused in centers and corridors.</p> <p>The Plan Commission's Recommended plan would be 65 percent single-family and 35 percent multi-family. Average net densities of new development would be 7.6 du/acre.</p>	<p>Approximately 36 percent multifamily housing.</p> <p>Average gross densities of 4 du/acre for single-family, 12 du/acre for multi-family. Net density of new development approximately 6 du/acre. Higher density focused in centers and corridors.</p>
<b>Economic Development</b>			
	<p>Planned increase in jobs by 2020, approximately 27,712 for all alternatives.</p> <p>Potential excess of industrial land (390 acres) based on initial testing of various land capacity reduction formulas.</p> <p>Potential deficit of commercial land (230 acres) based on initial testing of various land capacity reduction formulas.</p>	<p>Planned increase in jobs through 2020, approximately 27,712 for all alternatives.</p> <p>Updated land quantity analysis indicates an excess of 205 acres of industrial land and 33 acres of commercial land. However, uncertainties exist regarding the amount of constrained land in the West Plains area, as well as potential changes to Kaiser's operation.</p>	<p>Planned increase in jobs by 2020, approximately 27,712 for all alternatives.</p> <p>Similar to Current Patterns.</p>
<b>Historic Resources</b>			
	<p>For any of the alternatives, increased growth and urbanization would create market pressure for conversion of historic resources. A more dispersed growth pattern, as in Current Patterns, would subject unidentified resources to greater risks of disturbance.</p>	<p>Impacts similar to Current Patterns. More intensive growth adjacent to the Spokane River could threaten archaeological resources.</p> <p>Same impacts for the Plan Commission Recommendation.</p>	<p>Impacts similar to Current Patterns. More intensive growth adjacent to the Spokane River could threaten archaeological resources.</p>
<b>Transportation</b>			
	<p>All alternatives show relatively similar increases in traffic growth (higher vehicle miles traveled, longer travel time and reduced travel speeds) based on assumptions of SRTC regional model and city's growth targets. From a regional perspective (including growth alternatives for unincorporated areas), future improvements and high capacity transit will have more impact than incremental changes in land use pattern.</p> <p>No Action and Current Patterns would likely generate incrementally greater automobile traffic because they are auto-dependent and do not include transit.</p>	<p>Focusing growth in designated higher density mixed-use, transit-friendly nodes would make non-motorized travel more feasible. Assumed transit system would reduce automobile travel.</p> <p>Same impacts for the Plan Commission Recommendation.</p>	<p>Similar to Centers and Corridors.</p>

**TABLE 4 SUMMARY OF IMPACTS continued page 4**

	<b>Current Patterns and No Action</b>	<b>Mixed-Use Centers and Corridors &amp; Plan Commission Recommended Plan</b>	<b>Central City</b>
Public Services (Since release of the Draft Comprehensive Plan/EIS, the City of Spokane service providers have updated by a year their respective sections of the Capital Facilities Program. Their changes were made to the Plan Commission Recommended Plan only. Therefore, any statistical information in the following public services section was updated only for the Plan Commission Recommended Plan. The other alternatives information remains as printed in the Draft Plan/EIS)			
	Under any alternative, population growth will generate additional demand for fire and EMS service, police protection, schools, solid waste, and parks. This will involve a need for increased personnel, equipment, facilities, and programs. In general, a smaller UGA, higher densities and more compact development pattern (Centers and Corridors and Central City alternatives) could result in some service efficiencies, such as reduced response time. Growth in the JPAs and proposed UGA additions would reduce service demands and revenues to special districts or county departments, upon annexation or sooner pursuant to interlocal agreement.	General impacts similar for all alternatives	General impacts similar for all alternatives.
<b>Fire</b>	Under all three alternatives, additional calls for service will create needs for fire personnel, facilities, and equipment. Based on the city's six-year capital program and proposed LOS, facility needs for all alternatives would cost \$20.201 million by 2006. Current Patterns 20-year needs for new, relocated, or replaced fire stations, equipment and apparatus would cost \$17.2 million by 2020.	Facility needs would cost \$17.021 million through 2006. \$14.8 million for new, relocated, or replaced fire stations, equipment, and apparatus through 2020.	Facility needs would cost \$20.201 million by 2006. \$15.1 million for new relocated, or replaced fire stations, equipment, and apparatus by 2020.
<b>Police</b>	142 additional officers and 62 civilian employees (\$17.7 million operating costs) needed by 2020. Additional equipment (\$4.8 million) and facilities (\$17.9 million) needed.	88 additional officers needed through 2020 at a cost of \$11.3 million. Capital facility costs of \$7.7 million through 2006.	96 additional officers and 41 civilian employees (\$10.8 million in operating costs) needed by 2020. Additional equipment (\$3.3 million) and facilities (\$12.1 million) needed.
<b>Schools</b>	Additional school facilities will be required under any land use alternative. Costs similar or slightly lower for Current Patterns and No Action.	Additional school facilities will be required under any land use alternative. Costs similar or slightly higher for Centers and Corridors and Central City.	Additional school facilities will be required under any land use alternative. Costs similar or slightly higher for Centers and Corridors and Central City.
<b>Solid Waste</b>	Impacts similar for all alternatives based on per capita estimates of waste generation.	Impacts similar for all alternatives based on per capita estimates of waste generation.	Impacts similar for all alternatives based on per capita estimates of waste generation.

**TABLE 4 SUMMARY OF IMPACTS continued page 5**

	<b>Current Patterns and No Action</b>	<b>Mixed-Use Centers and Corridors &amp; Plan Commission Recommended Plan</b>	<b>Central City</b>
<b>Parks</b>	Additional park land, facilities, programs and maintenance required under any land use alternative. LOS standard of 5.28 acres per 1,000 people established to estimate costs. Additional 363 acres needed by 2020.	Additional park land, facilities, programs, and maintenance required under any land use alternative. LOS standard of 5.28 acres per 1,000 people established to estimate costs. Additional 363 acres needed through 2020.	Additional park land, facilities, programs, and maintenance required under any land use alternative. LOS standard of 5.28 acres per 1,000 people established to estimate costs. Additional 363 acres needed by 2020.
<b>Utilities</b>			
<b>Water</b>	<p>Growth associated with any land use alternative will generate additional needs for water.</p> <p>The alternatives would vary primarily based on the mix of single-family and multifamily housing (single-family uses about twice as much water per day as multifamily). Current Patterns would generate the greatest demand due to the largest UGA and greatest amount of single-family housing. No Action could generate the lowest demand due to the most compact UGA and the highest net densities.</p> <p>In unincorporated UGAs, water service would transition from special districts to the city upon annexation or sooner, based on interlocal agreements. Affected districts would experience lower water demand and reduced revenues.</p>	<p>Impacts lower than Current Patterns due to highest proportion of multifamily housing (41 percent) and smaller UGA.</p> <p>Impacts of the Plan Commission would be similar to the Central City alternative based on housing split.</p>	Impacts similar to Centers and Corridors.
<b>Sanitary Sewer</b>	<p>All alternatives would generate similar impacts based on assumed use of 100 gpd per capita; demand is not sensitive to density. Population growth would generate 6.9 mgd of wastewater by 2020. Cumulative demand (city and county) could exceed design capacity of SAWTP, requiring upgrading or an additional facility.</p> <p>More dispersed land use patterns, such as Current Patterns, would involve greater costs for extending pipes. Higher densities and smaller service area for No Action would involve lower infrastructure costs.</p>	<p>All alternatives would generate similar impacts based on assumed use of 100 gpd per capita; demand is not sensitive to density. Population growth would generate 6.9 mgd of wastewater through 2020. Cumulative demand (city and county) could exceed design capacity of SAWTP, requiring upgrading or an additional facility. Focusing a portion of future growth at higher density in centers could result in lower infrastructure costs.</p>	<p>All alternatives would generate similar impacts based on assumed use of 100 gpd per capita; demand is not sensitive to density. Population growth would generate 6.9 mgd of wastewater by 2020. Cumulative demand (city and county) could exceed design capacity of SAWTP, requiring upgrading or an additional facility. Focusing a portion of future growth in the downtown at higher density could result in lower costs for infrastructure.</p>

## **Summary of Mitigation Measures**

Natural Environment: Comprehensive Plan policies and programmatic actions would, if implemented and enforced, mitigate impacts to the natural environment.

### **Plants and Animals**

The Native Species Quality section of the Comprehensive Plan includes policies to protect and enhance native plant and animal species for future generations, identify and protect existing habitats and habitat networks, and designate and protect geographic areas that contain existing priority habitat and species and wetland areas. Native plant and animal species could be further protected through adoption and implementation of the draft Spokane Fish and Wildlife Habitat Conservation Area Ordinance. The ordinance requires that habitat management plans be prepared for proposed land uses or activities located in fish and wildlife habitat conservation areas. The city would require that plans address potential impacts to threatened and endangered species and identify protection or mitigation measures for avoiding habitat disturbance.

### **Air Quality**

Draft policies would replace wood stoves with cleaner heating sources, emphasize environmentally sound public facilities planning, the development of a solid waste management system that promotes recycling and packaging reduction, development of transit options to reduce emissions, and the mitigation of air quality impacts through the use of native vegetation.

### **Water**

Water quality policies focus on further study of the Spokane Valley-Rathdrum Prairie Aquifer, storm water management techniques to protect ground and surface water, regional watershed planning and reporting, mining and hazardous waste management restrictions, and the protection of natural drainages and well heads. Water quantity policies address water conservation programming, landscaping requirements, and the extension of the city sewer service. Shorelines policies seek to balance biological protection and improvement issues and public access needs. Aquatic habitats and recreational opportunities would be protected through policies aimed at watershed planning for the Spokane River and Latah Creek, the implementation of 'zero-pollution' industrial waste management policies, and the continuation of efforts to reduce the rate of impervious surface expansion.

### **Earth**

Landform protection policies include programs for mapping, acquiring or transferring development rights, imposing development restrictions on slopes greater than 30 percent, and managing geologically hazardous areas according to the administrative DSA regulations in the city's Municipal Code.

Land Use: The goals, objectives, and policies of the Comprehensive Plan are intended to mitigate potential adverse land use impacts of future growth within the city. The plan seeks to achieve a balance between multiple needs, including maintaining growth consistent with infrastructure capacity, reducing patterns of sprawl within the UGA, enhancing neighborhood structure, and preserving important open space and resources.

As part of plan implementation, major development controls, including the zoning code, subdivision ordinance, and resource protection ordinances would be reviewed and updated as necessary to ensure that regulations reflect state policies, achieve consistency between the land use plan and regulations and ensure fairness for property owners.

Population: Draft Comprehensive Plan goals and policies are intended to mitigate the potential adverse housing impacts of increased growth in the City of Spokane. Proposed goals and policies encourage new

development to occur in ways that are compatible with the overall character of existing neighborhoods and to phase new development with the provision of services and facilities.

The city will continue to refine its land quantity calculations to verify that sufficient land is available to accommodate population targets and housing needs. Population and housing targets or target densities and land use designations could be refined prior to the release of the Final Comprehensive Plan/EIS. Land supply and demand should be monitored.

### **Housing**

The proposed comprehensive plan goals and policies are intended to maintain an adequate supply and promote development of a variety of housing options for all economic groups, coordinate county housing programs with other jurisdictions in the region, reduce regulatory barriers and allow greater flexibility in regulations and permitting processes, assist low and moderate-income households in obtaining affordable housing, permit special-needs housing, and promote equal access to housing for all persons.

### **Economic Development**

The city's proposed UGA provides capacity to accommodate a substantial portion of forecast new jobs, roughly 45 percent of the 20-year county-wide forecast. The city should coordinate with the county, other jurisdictions, the EDC, and other groups to ensure that employment targets are reasonable.

The city will refine its land quantity analysis methodology. Updated analysis will be used to confirm and adjust any excess or deficit for particular types of jobs. After adoption of the Comprehensive Plan, the city should monitor land supply and employment data annually.

### **Historic Resources**

Draft Comprehensive Plan policies are intended to identify and protect important cultural resources. Implementation strategies include design guidelines and design review, economic incentives, and development regulations that protect historic character.

### **Transportation**

In addition to plan goals and policies and planned improvements, the city is testing the effects and costs of different land use alternatives, level of service standards, and approaches to managing concurrency. These programs will help it manage growth and to assure that adequate transportation facilities are in place concurrent with new development, as required by the GMA.

The Draft Comprehensive Plan proposes a two-tier LOS/CMS program. To meet broad planning and capital facilities programming needs, the first tier is a Planning LOS/CMS program based on travel times along principal arterials and key minor and collector routes. This is the basis for evaluating the comprehensive plan land use alternatives. The second tier will be used for reviewing individual development projects. The LOS/CMS program for individual development projects still needs to be defined in terms of when and how it will be applied. Other key features of the draft program include different standards for different areas of the city; and allowing more congestion when significant levels of alternative travel modes, such as transit are available.

### **Public Services**

Draft Comprehensive Plan policies would help address the needs for public services, including fire suppression and EMS, police, schools, solid waste, and parks. These policies include the adoption of level of service standards and the pursuit of all practical and equitable means to fund needed capital facilities.

The city should execute interlocal agreements with county departments or special districts providing services to the JPAs and proposed new UGAs. As required by IUGA interim development regulations, it should document levels of service and cost sharing/reimbursement prior to annexation of these areas by the city.

Phasing of growth (geographically or temporally) could help to coordinate further growth with existing or planned service capacity. Locating facilities like schools in conjunction with planned growth nodes could reduce transportation costs.

Imposition of fees permitted by the Growth Management Act would help ensure adequate financing for facilities to serve new growth and development.

## **Utilities**

### **Water Service**

The Draft Comprehensive Plan incorporates goals consistent with the Countywide Planning Policies that seek to coordinate water system planning to promote efficient service, protect natural resources, conserve water and ensure orderly and efficient development. Adherence to these goals and policies will help mitigate the impact of increased water demand as the community grows.

To ensure an orderly transition of service to joint planning areas and proposed UGAs, the city, Spokane County, and special districts will need to establish interlocal agreements to establish how and when to finance improvements and to support adopted level of service and planned land use. Compact development and infill development would be promoted to fully utilize the capacity of existing facilities. The cost and resources used by consuming more land to extend new water systems into undeveloped areas would be weighed against goals and policies for the preservation of neighborhood character, and protection of the aquifer resource and environmental quality.

### **Sewer Service**

Draft Comprehensive Plan policies are intended to ensure that the city provides adequate utility service in compliance with the GMA and CWPPs. This includes defining a level of service for sewer service and providing adequate levels of funding, providing services concurrent with new development, and phasing services (geographically or temporally) based on availability of services. The city will also assess impact fees to help share the costs of new public facilities. Funding shortfalls would trigger a reassessment of the Comprehensive Plan's land use element and adopted levels of service. Sewer service would be prohibited outside the UGA.

The city and county should coordinate within the JPAs to reduce groundwater inflow and infiltration into damaged pipes to reduce flows and allow for increased treatment plant capacity.

Interlocal agreements for joint planning areas and other areas included within the proposed UGA should be developed to address future infrastructure needs, level of service, and the transition of services.

## **Summary of Unavoidable Adverse Impacts**

Natural Environment: Increased growth, clearing, grading, construction, human activity, traffic, and the expansion of public facilities under any of the land use alternatives will result in incremental impacts to the city's natural environment and resources.

### **Land Use**

Future growth within the city under any land use alternative will result in increased development and urbanization. Land will be committed to urban uses for the foreseeable future. Some conflicts between uses are unavoidable.

### **Population and Housing**

Future population growth will generate additional demand for housing and will place greater demands on existing facilities and infrastructure. Land developed for residential uses would generally be unavailable for other uses.

**Economic Development**

Continued economic growth, in conjunction with population growth, will result in some land use conflicts, consumption of land and other resources, and increased demands for public services and capital facilities.

**Historic and Cultural Resources**

Future growth and development will increase pressure for redevelopment of historic sites and buildings. Development activities could disturb archaeological resources.

**Transportation**

Traffic will increase as a result of growth. The extent of impacts will depend on the nature and magnitude of regional and local transportation improvements.

**Public Services**

Increased growth will generate additional demands for fire and EMS service, police protection, schools, solid waste, and parks. Additional land, facilities, equipment, programs, and personnel will be required to accommodate planned growth.

**Utilities**

Additional water will be consumed for potable water and wastewater treatment. Existing facilities and infrastructure will need to be expanded.

### **3. RESPONSES TO COMMENTS ON THE DRAFT EIS**

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This section of the Final EIS responds to substantive comments received on the Draft EIS. As noted previously, the great majority of comments received during the 120+ day comment period were focused on particular plan policies/text language, plan maps, site-specific land uses, or preferences for one or another land use alternative. City staff responded to these comments during its work with the Plan Commission. The responses in the Final EIS are limited to those that address environmental issues, and to those that raise questions about information contained in the Draft EIS. A total of five comment letters contained these types of questions or issues. Responses are provided below. Comment letters are provided in Appendix A.

#### **Local Agencies**

##### **Letter No. 121 - Spokane Wastewater Management Department**

1. As noted in the Draft Comprehensive Plan/EIS project description (Vol. 2, Chapter 16.1, page 7), the 20-year population target the city is using for its planning is 68,800. This reflects a decrease of approximately 10,000 people that was approved by the Board of County Commissioners in 1999, due to double counting of unincorporated population allocated to Joint Planning Areas. The excess population was reallocated to the unincorporated UGA.

2. Please refer to the discussion in the Draft Comprehensive Plan/EIS (Vol. 2, Chapter 16.3, page 39) regarding the estimated capacity for industrial and commercial land. Those estimates, and the methodology used to calculate them, reflect a surplus of approximately 390 acres for forecast industrial jobs and a deficit of approximately 230 acres for commercial land. Note that these estimates do not account for land that could be redeveloped for employment uses.

The updated land capacity analysis indicates small surpluses of commercial land (33 acres) and industrial land (205 acres) for the Plan Commission's Recommended Plan; please refer to the discussion in Chapter 2 of the Final EIS.

#### **Individuals and Associations**

##### **Letter No. 92 - Thomas K. Hannon**

1. Your comment regarding population growth is acknowledged. The Growth Management Act (GMA), (RCW 36.70A.110) requires that cities and counties subject to the Act base their plans on 20-year population forecasts prepared by the Office of Financial Management (OFM). Use of this number, which could be characterized as a "point" forecast (i.e., for a specific point in time), is mandatory. Urban Growth Areas must be sized to accommodate the expected population for the 20-year period. OFM provides a high, mid and low forecast for each county. The jurisdictions within each region determine among themselves which forecast to use and how the 20-year county-wide forecast will be allocated among the county and individual cities. It is the responsibility of each jurisdiction to plan to accommodate its projected population.

Planning under the GMA is an ongoing process, however, and plans are subject to frequent adjustments. Comprehensive plans must be reviewed regularly and revised or updated as necessary, although no more than once each year. The "buildable lands" provision of the GMA (RCW 36.70A.215) requires that affected cities and counties monitor land use, development and population growth to ensure that they are meeting their goals, and to determine whether assumptions or conditions have changed and require adjustment.

## **Letter No. 107 - Rich Thorsten (1000 Friends of Washington)**

1. Your preference for a smaller UGA is acknowledged. Please refer to the description of alternatives and the discussion of UGA boundaries and land capacity in the Draft Plan/EIS (Vol. 2, Chapter 16.1, page 7, and Chapter 16.4, page 35, respectively), and in the Land Use discussion in this Final EIS. Please note also that the Draft EIS No Action alternative assumes there would be no expansion of the existing Interim Urban Growth Area boundary and that development would occur at significantly higher densities (an average of 8-15 dwelling units per acre). In general, the alternatives do examine the effects of varying UGA boundaries as well as different land use/density patterns. The Draft EIS identifies that the expanded UGAs involve intrusions into lands that are designated as Rural or Urban Reserve in Spokane County's proposed Comprehensive Plan, and that contain identified critical areas (Vol. 2, Chapter 16.4, page 37). The Interim Urban Growth Area EIS (Spokane County, 1996) also evaluated the option of limiting the city's growth within its existing corporate boundaries.

The larger UGA boundaries included in the other three plan/EIS alternatives should be viewed in the context of a variety of factors. First, the areas included within the expanded UGA are contiguous to the city and are either characterized by urban growth or adjacent to such growth. These conditions would appear to satisfy the GMA criteria for inclusion in a UGA (RCW 36.70A.110). Moreover, some of these areas already receive urban services from the city. Second, a significant portion of the additional land included in the three action alternatives consists of employment land. This is intended to promote economic development and jobs and to ensure that the city can economically sustain forecast growth. Third, as pointed out in the Draft EIS, the City of Spokane's methodology for calculating UGA land supply needs does not include a "safety factor." Inclusion of such a factor would justify a larger UGA relative to No Action.

The City of Spokane's updated land quantity calculations identify surpluses of land for residential (482 acres) commercial (33 acres) and industrial development (205 acres). If the city were to pursue a more conservative approach to land supply and to include a safety factor, any excesses would disappear. Please refer to the Land Use discussion in Section 2 of the Final EIS.

2. The City of Spokane's population target is the result of a regional process that allocated future growth among the county and cities. It is the city's intent to accommodate a greater than historical proportion of the region's growth, as a means to counter sprawl and accomplish the GMA's goals. The average densities reflected in the Centers and Corridors alternative and the Plan Commission's Recommended Plan reflect a balancing of considerations, including maintaining the integrity and character of existing single-family neighborhoods, and achieving compact higher density development at feasible levels in centers and corridors.

Using the Comprehensive Plans of King, Snohomish and Kitsap Counties as examples, as well as the Growth Management Hearings Board decisions regarding those plans, the identification of joint planning area and/or areas for future annexation is an accepted approach to regional planning and to the eventual transfer of greater responsibilities for urban development to cities.

3. Your comment regarding the ratios of acres of land for single-family and multi-family housing is acknowledged. However, as shown in the Population and Housing discussion in the Draft EIS (Vol. 2, Chapter 16.5, page 44), specifically in Tables 4 and 6, 41 percent of the new housing developed by 2020 for the Centers and Corridor alternative is planned to be multi-family units. This compares to a current ratio of 25 percent multi-family and 75 percent single-family, and reflects a significant increase. The Plan Commission's Recommended Plan would contain 65 percent single-family housing and 35 percent multi-family. The change in housing type and increased density is more significant, therefore, than the gross acres devoted to residential uses. The land use scenarios are intended to maintain Spokane's single-family residential character while also providing greater amounts of multi-family housing to meet the needs of the population.

Other things being equal, higher densities can make housing relatively more affordable. Thank you for your suggestions regarding additional provisions to encourage provision of low-income housing.

4. Your comment regarding critical areas in the West Plains industrial area is acknowledged.
5. Thank you for your comment regarding joint city-county planning. The issues raised in your comment are generally addressed in Spokane County's adopted interim development regulations, which implement the interim urban growth area (Ordinance 97-0321, section 3), as well as in the County's proposed Comprehensive Plan. Changes contained in the Plan Commission's Recommended Plan (Chapter 12, "Neighborhoods," policies N 8.7 and N 8.8) would also address some of these issues.

### **Letter No. 85 - Cary P. Driskell (Trunkenbolz/Rohr/Driskell PLLC)**

1. Your comment is acknowledged. The Growth Management Act gives local jurisdictions the option to address any subjects in their comprehensive plans that are relevant to planning for future growth; refer to RCW 36.70A.080.

2. The GMA identifies the process and criteria that must be used to identify urban growth areas (RCW 36.70A.110). This includes negotiated agreement among jurisdictions concerning population allocations and proposed UGAs. The Countywide Planning Policies for Spokane County also contains policies relevant to identifying UGAs (Policy Topic 1), and directs jurisdictions to use a joint planning process and interlocal agreements to plan for UGAs (Policy Topic 2, Policy 1). Spokane County's Development Regulations for implementing the Interim Urban Growth Area (Ordinance 97-0321, Section 3) contains such a process and includes criteria for future "joint planning" for unincorporated lands contiguous to city boundaries. Please refer to the Interim Urban Growth Areas EIS (Spokane County, 1997) and the Spokane County Comprehensive Plan EIS (Spokane County, 2000). Within this context, nothing in the statute, case law or hearings board decisions would prohibit the city from proposing to expand its UGA. Many county comprehensive plans (e.g., King, Snohomish, Kitsap) provide a process for expansion of city UGAs over time through cooperative planning.

The Draft Plan/EIS discusses the issue of an expanded city UGA (Vol. 2, Chapter 16.4). The project description of the Draft Plan/EIS (Chapter 16.1) discloses that the city had made such a proposal. As of this writing, the Steering Committee has not made a decision. The writer's opinion regarding judicial and statutory authority is noted.

The EIS No Action alternative assumes continuation of the existing IUGA boundary, while the three action alternatives – and the Plan Commission's Recommended Plan – consider the effects of larger, and different expanded UGA boundaries. The EIS notes that average densities for new development would have to increase significantly to accommodate forecast growth within the IUGA or within the city limits. The Plan Commission, interested citizens and the City Council will, therefore, be able to consider the option and effects of different size UGAs. Please note that the Interim Urban Growth Area EIS (Spokane County, 1996) also discussed the effects of accommodating all of the city's growth within its existing corporate boundaries.

The writer's opinion regarding the city's population allocation is acknowledged. Please note that this allocation was reduced by approximately 10,000 people in 1999 by action of the Board of County Commissioners.

3. The City of Spokane's approach to GMA planning and environmental review is described at length in the Draft EIS (Vol. 2, Chapter 16.1) and this Final EIS (section 1). As is common for comprehensive plans, the city has been following an iterative process. It has published preliminary information and draft concepts to provide interested parties with an opportunity to comment. This input has been used to supplement planning and environmental information and to refine plan concepts, policies and implementing measures.

The Initial Development Regulations (IDR's) are summarized in Section 2 of the Final EIS. The IDRs were published for preliminary review and comment in January, 2001. This review is ongoing as of this writing and may continue after the adoption of the Comprehensive Plan. The city is following a process of phased adoption of implementing measures and phased environmental review. Additional environmental documentation will occur, as appropriate, as regulations are refined or supplemented. In general, the environmental effects of measures that implement plan policies are the same as the impacts of the policies themselves.

Your comment regarding certain plant species is acknowledged. The State Environmental Policy Act (SEPA) Rules permit agencies to proceed with environmental review and with decision making when some information is missing and/or when uncertainty regarding impacts exists. Please refer to WAC 197-11-080(2). The Draft Plan/EIS and Final EIS also disclose that the city is using a process of phased environmental review, as permitted by the SEPA Rules (WAC 197-11-060(5), 197-11-228(2)(b)).

4. Your comment is acknowledged. Transportation levels of service and appropriate mitigation measures will be determined in the context of the City Council's adoption of the Comprehensive Plan. The Draft Plan/EIS provides relevant information that may be used to help make this decision.

5. Your comment is acknowledged.

6. Your opinion regarding school crowding is acknowledged. The Draft Plan/EIS is based on level of service information obtained from school districts. This approach is consistent with the GMA's requirements (RCW 36.70A.070(3)).

7. Your comment is acknowledged.

8. The Draft EIS consistently uses the average gross density of new development as a measure to describe and compare the alternatives. The density ranges contained in specific land use categories in the plan or zoning does not bear on the way that overall densities are described and compared in the Plan or EIS. It is acknowledged that planned densities and zoned densities should be consistent with the target average density.

9. The number and types of alternatives in the Draft Plan/EIS provide a reasonable range of options for consideration and are consistent with the requirements of WAC 197-11-060(3)(a)(iii), 197-11-440(5), and 197-11-442(4). The alternatives vary a number of features – including transportation systems – as a way to help interested readers and decision makers understand and consider the effects of various components of the comprehensive plan. This is an important purpose of SEPA environmental documents.

10. The question of sewer service is addressed in the Draft Plan/EIS utility discussion (Vol. 2, Chapter 16.10). The discussion of the No Action alternative (page 73) notes that population size, not density, is the primary determinant of wastewater flows. Since population levels are the same for all alternatives, wastewater flows would be comparable. The analysis also discloses that No Action, and its smaller UGA, would result in reduced costs for some sewer system infrastructure relative to the other alternatives.

11. The writer's opinion is acknowledged. The GMA encourages jurisdictions to consider using innovative implementation tools, including transfer of development rights (TDR) (RCW 36.70A.090). In fact, King County is using TDR to preserve agricultural and forest lands. The County and City of Seattle are currently using a joint TDR process to transfer development rights from rural to urban areas. The City of Seattle has been using TDR for two decades to preserve historic and cultural properties.

12. Your comment is acknowledged. Accomplishing the GMA's multiple goals may require some balancing of city objectives. The Centers and Corridors alternative, and the Plan Commission's Recommended Plan, would increase the proportion of multi-family housing to 41 percent, compared to the current 25 percent. This is intended to make housing more affordable, as well as to conserve land and prevent sprawl.

13. Your comment is acknowledged. Please refer to WAC 197-11-448.

## **Letter No. 67 - Andrew Warlock (CLC Associates, Inc.)**

1. Your preference for the Centers and Corridors alternative is acknowledged, as is your comment regarding the Indian Trail area. The Centers and Corridors alternative and the Plan Commission's Recommended Plan include a hierarchy of centers of various type, size and function. The Draft Plan and the Plan Commission's Recommended Plan also provide criteria for establishing and designating new centers. Please refer to Chapter 4, "Land Use," policies LU 1.2, 1.6 and 1.7. Policy LU 7.4 suggests using sub-area and neighborhood planning processes to address land use issues. The centers criteria are not based explicitly or exclusively on analysis of market criteria or conditions, or the spacing between centers.
2. Basing the designation of centers on existing land use and development patterns is consistent with the GMA principle of using land and public services/facilities more efficiently and achieving compact development patterns. Existing centers are intended to be redeveloped over time to achieve more dense and intensive development.
3. Your comment is acknowledged. The Draft Plan/EIS discussion of Plans and Policies (Vol. 2, Chapter 16.4) discloses a potential deficit, based on employment forecasts, of between 230 and 310 acres of commercial land.
4. Designating new centers and/or changing zoning classifications would require amendments to the Comprehensive Plan land use map and/or rezoning. Several policies in the Draft Plan and Plan Commission's Recommended Plan commit the city to monitoring and maintaining an adequate supply of land to meet economic development goals.
5. Your comment regarding land values is acknowledged. Such issues are beyond the scope of issues that must be discussed in an EIS; please refer to WAC 197-11-448 and 450. The GMA's buildable land provisions (RCW 36.70A.215), and the city's proposed monitoring program, would help to identify land shortages, which may be connected with increasing land values to some degree.
6. Your comment is acknowledged.
7. Please refer to the response to comments 1 and 2.
8. Your comment is acknowledged.