



Whipple Consulting Engineers, Inc.

December 17, 2021
WCE No. 21-3129

Spokane County Building & Planning
1026 W Broadway Avenue
Spokane, WA 99260-0500

Attn: Saegen Neiman, Associate Planner

**Re: Havana Road Comprehensive Plan Amendment (Cover Letter)
Change from Light Industrial to Medium Density Residential
4860 N Havana Street, 4315 E Valley Springs Road, Spokane County, WA**

Dear Saegen:

Attached is the application, supporting documents, and the fee for the Havana Rd Comprehensive Plan Amendment, to change the current land use designation of a parcel from Light Industrial (LI) to Medium Density Residential (MDR).

The submitted material includes:

- Annual Comprehensive Plan Amendment – Request to Initiate Amendment form
 - With owner authorization letter
- SEPA Checklist
- Property Information & Studies
 - i. Application Support Information Memo included in this letter
 - ii. Planning Level Trip Generation & Distribution Letter
- Fees

Narrative

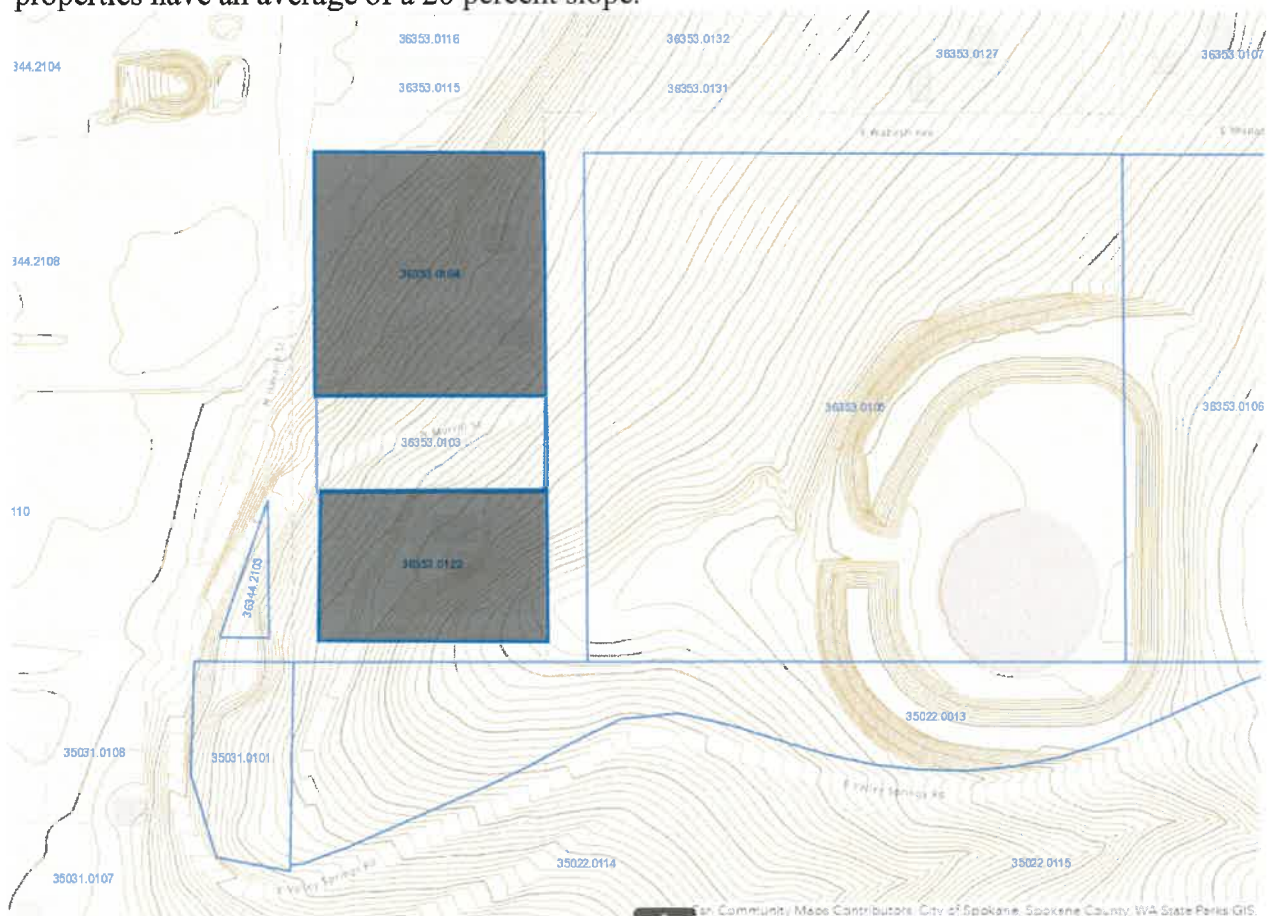
The subject properties total 3.13 acres +/- and are within an area of increased industrial commercial and residential development, combined with the north-south freeway Wellesley ramps, and the economic demand for more housing within Spokane County. There is also an increase in the need to develop properties to their highest and best use. The subject property, located on a local access and an Urban Major Collector within the City of Spokane, best fits within neighboring parcels land use designation. The subject property is currently designated as Light Industrial. To the west and north is Light Industrial and to the east and south is Residential Single Family (4-10).

The subject properties are within a mile of the Shopping Centers on Market Street, there is adjacent sidewalk for some of the length of Wellesley Road. The subject properties are also a mile from of the Shaw Middle School and three-quarters of a mile from Regal Elementary School.

The subject properties are within a unique strip of land that is within Spokane County and surrounded on three sides by the City of Spokane. This unique strip of Spokane County has existed for over 50 years, when we believe that the City of Spokane annexed the Beacon Hill

area and the reservoir Property. The subject properties were never annexed into the City of Spokane and never developed beyond their original residential uses. The same driveways carved out by the original builders, can be seen in the historic maps and photos at nearly the same position. However, the City has indicated in other projects near the boundary that they are not interested in the annexation of residential property.

The subject properties are proposed to change from Light Industrial to Medium Density Residential. The subject properties have operated as single family residences since the 1930's when the homes were built. We believe that the Light Industrial designation of these properties was a mapping error. While the properties are adjacent to the City of Spokane Light industrial area to the west. That western area is generally flat and well suited to the development of warehouses, factories, and storage. Whereas as shown on the contours below each of the subject properties have an average of a 20 percent slope.

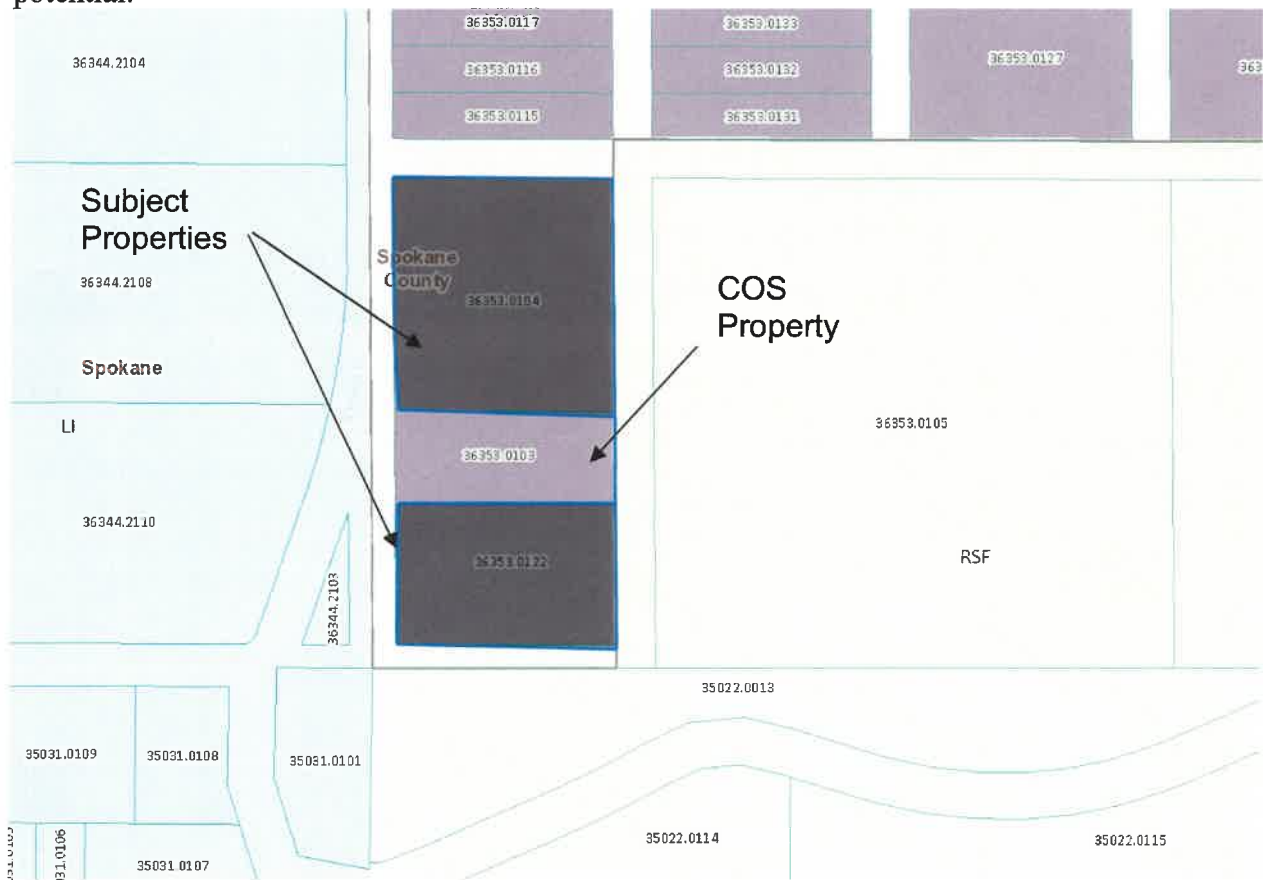


This change in elevation approximately 50 feet is not an ideal ground for light industrial. However, a Medium Density Residential development is more versatile when it comes to sloped properties. There are many examples around the area where apartment units have terraced the buildings and parking areas.

Between the subject properties is parcel 36353.0103 a 34,200 sf (0.79 ac +/-) piece of land that was deeded to the City the Spokane with the reservoir property, So as a non-taxed parcel there is no incentive for the City to develop the property per the GMA and the comprehensive plan. The

applicant at the behest of Spokane County staff has reached out to the City of Spokane, requesting that this parcel be included in the CPA, in order to maintain a consist view of the map and maintain a CPA that has contiguous parcels. Our request was returned by the City of Spokane Legal department, with a reply of no interest in joining the CPA. Which is understandable as a nontaxed parcel within Spokane County there is little incentive to correct a land use designation as the parcel is not anticipated to be developed. We therefore request that at the parcel be included in a County staff sponsored area wide land use review or as an update to the UGA.

The ideal planning concept is to step down zones by intensity (LI-MDR-LDR). This concept allows for the buffering of direct and indirect impacts, and utilizes the land to its highest potential.



Reasoning and Purpose

The reasoning and purpose of this comprehensive plan amendment request is ultimately to see these lands within the Urban Growth Boundary be developed and used as intended by the Growth Management Act. The growth management act gives guidance and direction for development and relies upon the development community to fulfill the designations of the comprehensive plan amendment. Reasons why the development has not occurred per the current designation, maybe due to the property not being for sale or that the focus of development is elsewhere at more ideal locations, such as closer to transport transit routes, such as air or rail lines.

In this case the properties have not been developed as they are not ideal for light industrial, which prompted this request to change the land use designation and zoning from Light Industrial (LI) to Medium Density Residential (MDR). We have attached a simplified comparison analysis that helps illustrate these benefits the following Table is an excerpt from the attached comparison.

Table 1 Spokane County Land use Comparison

LI Comparison to MDR				
Zoning		MDR	LI	Difference
Density		47	68.17 ksf	-
Persons	#	80	50	30
Traffic	AM	17	34	-17
	PM	22	29	-7
	ADT	255	317	-62
Water	ERU	29.58	54.54	-24.96
Irrigation	MGPY	6.37	0.26	6.11
Negative indicates a reduction in resources				

ADT – Average Daily Trips ERU – Equivalent Residential Unit MGPY – Million Gallons Per Year

The comparison of Table 1 Illustrates the differences between the different zoning. While the land uses are “opposites” there are still some things that they would have in common. While MDR would have 80 persons residing on site the LI would have 50 persons working in the day. Traffic to/from the site is flipped with the work to home and home to work. But overall the MDR zone would decrease trips but those trips would be opposite of the LI use so instead of leaving for the commute the trip they would be entering. This switch of direction works to balance the directional load of intersections which maintains acceptable intersection Level of service. In terms of water usage, the LI typically has less water usage with less persons. The benefit does go beyond this comparison as the change in use would provide affordable residential development near places of employment, on land that is not suited for its current land use designation.

APPLICATION SUPPORT INFORMATION

Spokane County Zoning Code

14.402.040 Criteria for Amendment

The County may amend the Zoning Code when one of the following is found to apply.

1. The amendment is consistent with or implements the Comprehensive Plan and is not detrimental to the public welfare.
2. A change in economic, technological, or land use conditions has occurred to warrant modification of the Zoning Code.
3. An amendment is necessary to correct an error in the Zoning Code.
4. An amendment is necessary to clarify the meaning or intent of the Zoning Code.
5. An amendment is necessary to provide for a use(s) that was not previously addressed by the

Zoning Code.

6. An amendment is deemed necessary by the Commission and/or Board as being in the public interest.

We believe that the criteria for amendment has been meet under item 1 as the proposed amendment is consistent with the goals and policies of the comprehensive plan as well as under item 3 as we believe that the designation of this land as LI is inconsistent with the topography of the land.

1. What Comprehensive Plan Goals and Policies support, encourage, or are consistent with the proposal? List specific goals and policies.

Listed below are the Comprehensive Plan Goals and Policies that support, encourage or are consistent with the proposal to change an area of light industrial to medium-density residential.

Urban Land Use

General Goals

UL.1a Provide a healthful, safe and sustainable urban environment that offers a variety of opportunities for affordable housing and employment.

The proposed amendment is for an area that is currently growing with new residential land uses and new commercial and industrial employment opportunities. The subject property is designated as light industrial within the urban area of Spokane County near the intersection of Havana Street & Valley Springs Road and near the North-south Corridor and Market Street. With the proposed change the property would be allowed to be developed at a greater residential density with affordable housing to answer the future needs of this area.

UL.1b Create a future rich in cultural and ethnic diversity that embraces family and community values and recognizes the interests of the whole community.

A proposed compact development under the medium-density residential land use allows for a mixture of peoples from multiple backgrounds to live and interact within a community.

Urban Character and Design

Goals

UL.2 **Maintain and enhance the quality of life in Spokane County through urban design standards.**

Policies

Multifamily Residential

- UL.2.16 Encourage the location of medium and high-density residential categories near commercial areas and public open spaces and on sites with good access to major arterials.

Amending the zoning of the site as proposed. provides medium-density residential zoning with access to Wellesley Avenue and the north-south corridor highway as well as other collectors and arterials that connect directly with the Industrial and commercial zones of Central Spokane

- UL.2.17 Site multifamily homes throughout the Urban Growth Area as follows:
- a) Integrated into or next to neighborhood, community or urban activity centers.

The proposed medium-density residential zoning would serve as a buffer to the RSF zoning from the light industrial uses. The future development would also be equivalent to the development within the city to the southeast.

- b) Integrated into small, scattered parcels throughout existing residential areas. New multi-family homes should be built to the scale and design of the community or neighborhood, while contributing to an area-wide density that supports transit and allows for a range of housing choices.

A proposed future multi-family residential development located within the proposed MDR zoning would provide housing within the various projected development types in the area.

- UL.2.18 Establish development requirements that encourage quality design within multifamily development areas.

Any proposed projects in the amended zoning would be developed per current County Development Standards. Whether they are multifamily apartments, rowhouses or other compact residential development

- UL.2.19 Develop standards that prescribe maximum building heights and other building design features to give a residential scale and identity to multifamily developments.

Any proposed projects in the amended zoning would be developed per current County Development Standards. Whether they are multifamily apartments rowhouses or other compact residential development

Viewscales

Goals

UL.5 Provide for an aesthetically pleasing urban environment and encourage the maintenance and enhancement of natural and cultural views.

Policies

Utilities

UL.5.7 Encourage placing power and telecommunication lines underground, at the rear of properties or in alleyways.

Power and telecommunication lines are anticipated to be kept underground for an apartment complex or other residential development.

UL.5.8 Encourage joint planning of linear infrastructure such as transportation, water, sewer, power, and telecommunications.

With the development of the property, coordination with the surrounding utility companies are anticipated.

Residential Land Use

Residential land use ranges from low-density, single-family neighborhoods to group homes and medium-density multifamily apartments. The challenge to the community is to provide for this range of uses and affordable housing consistent with goals for protection of neighborhood character. Community involvement in design and a greater level of planning detail within the Comprehensive Plan are methods to achieve these objectives. Additionally, subarea and neighborhood planning can offer further opportunities for achieving residential goals.

Residential Land Use

Goals

UL.7 Guide efficient development patterns by locating residential development in areas where facilities and services can be provided in a cost-effective and timely fashion.

Policies

UL.7.1 Identify and designate land areas for residential use, including categories for low-, medium- and high-density areas.

This proposed amendment will provide residential density within the urban area.

UL.7.2 Coordinate housing and economic development strategies to ensure that sufficient land is provided for affordable housing in locations readily accessible to employment centers.

The area is currently being developed with multiple economic employers on land that is

zoned as industrial, commercial and residential uses that are in proximity to the north-south corridor highway. We understand that the development of these lands will need workers. Workers primarily live near their work as a matter of convenience. With the location of the property within a mile or two of these economic employers residential housing will be needed, and especially affordable housing which in Spokane County is typically an apartment rowhouse or duplex. Thus, making residential units that are affordable within proximity of the economic employers.

UL.7.3 New urban development must be located within the Urban Growth Area (UGA) boundary.

The proposed amendment is for land that is currently zoned within the UGA as light Industrial.

UL.7.5 Provide for bonus densities, zero lot line housing, auxiliary structures, accessory dwellings or similar methods to promote infill development, where appropriate.

The proposal would facilitate this standard, as a denser apartment, rowhouse or compact development is desired.

UL.7.6 Develop regulations and incentives to encourage cluster development of residential lands so open space, view, watersheds and critical areas are permanently protected. (See also, "Exemplary Design - Planned Unit Developments," in the Urban Character and Design Section.)

The proposal would facilitate this standard, as residences would be grouped and density would be increased, thus reducing impacts. Additionally, apartments provide open space and other recreational amenities. There are no known critical areas on the properties.

UL.7.7 Home occupations may be allowed, provided they will not:
a) Disrupt residential amenities concerning sight, sound, smell and similar factors; or
b) Create traffic which exceeds road design or which develops traffic hazards within the neighborhood.

The proposal would facilitate this standard, where applicable.

UL.7.8 Promote and facilitate the development and location of home-based child-care.

The proposal would facilitate this standard, where applicable.

UL.7.9 Encourage businesses to provide opportunities for employees to work at

home.

The proposal would facilitate this standard, where applicable with anticipated telecommuter connections which is an increasing trend among employers with the recent pandemic.

UL.7.10 Phasing of land development shall be consistent with established levels of service for the provision of public facilities and services within UGAs.

The area of the amendment is within the UGA and as new development projects are proposed, they will go through the review process per the standards in effect at the time to determine that there are adequate public facilities to service the proposal.

UL.7.11 Establish zoning and subdivision regulations that require residential developments to provide the following improvements:

- a) Paved streets (and alleys if appropriate), curbs and sidewalks, paths and internal walkways, when appropriate;
- b) Adequate parking consistent with local transit levels;
- c) Street lighting;
- d) Storm water control;
- e) Public water supply;
- f) Public sewers.

Current development standards require or allow for these elements and as such any proposed projects in the amended zoning would be developed per those standards. Public Water and Public Sewer are on the subject properties.

UL.7.12 New development within the UGA shall be connected to public sewer, consistent with requirements for concurrency. Developer-financed extensions of public sewer may be allowed within any area of the UGA provided capacity and infrastructure needs are adequately addressed.

As with the current zoning, any new projects proposed under the amended zoning will be required to connect public sewer. There is an 8-inch public sewer line within Havana Street.

Housing Variety

Goals

UL.8 Create urban areas with a variety of housing types and prices, including manufactured home parks, multifamily development, townhouses and single-family development.

Policies

UL.8.1 Provide for mixed-income development in residential areas and encourage opportunities for co-housing and shared community resources, where

appropriate.

Medium-density residential development has the capability of providing mixed-income development by providing a variety of unit sizes with a mixture of amenities to facilitate housing for different income levels.

Residential Density

Goals

UL.9b Create efficient use of land and resources by reducing the conversion of land to sprawling, low density development.

The proposal would facilitate this standard, where applicable.

Policies

UL.9.1 Establish low, medium, and high density residential categories to achieve population and economic growth objectives. Low density residential areas shall range from 1 to and including 6 dwelling units per acre, medium density residential shall range from greater than 6 to and including 15 dwelling units per acre and high density residential shall be greater than 15.0 residential units per acre. Mixed residential densities may be established through community-based neighborhood planning, subarea planning, or approval of traditional neighborhood developments.

Approval of this proposal would allow a medium-density residential area east of Light industrial uses that is readily accessible to the transportation system and within proximity of economic development within industrial and commercial zone around Market Street.

UL.9.2 Spokane County shall seek to achieve an average residential density in new development of at least 4 dwelling units per net acre in the Urban Growth Area through a mix of densities and housing types.

Approval of this proposal for amending the site to medium-density residential would result in densities up to 15 dwelling units per acre.

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Havana Road CPA Cover Letter
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If you have any question or comments, please feel free to contact me at (509) 893-2617.

Sincerely,
WHIPPLE CONSULTING ENGINEERS, INC.

A handwritten signature in blue ink, appearing to read "Ben Goodmansen", with a long horizontal flourish extending to the right.

Ben Goodmansen, E.I.T.
BNG/bng

Development Guideline	
Spokane County Zoning Code	

WCE Worksheet	
Date	12/17/2021
Proj. #	21-3129

Property Size	Percentage		(ac)		Percentage		(ac)		Percentage		(ac)	
3.13 ac												
Open Green Space	10%	0.31	55%	1.72	25%	0.78	20%	0.63				
Roads+ rooftops	40%	1.25	25%	0.78	40%	1.25	45%	1.41				
Storm	50%	1.57	20%	0.63	35%	1.10	35%	1.10				

Percentages Based Upon Project Averages.

Persons	LI		LDR		MDR		HDR				
	Rate	Value	Rate	Value	Rate	Value	Rate	Value			
Density	50% Prop (ksf)	68.2	8 units/ ac	25	15 units/ ac	47	30 units/ac	94			
	4 p/ac	13	2.7 p/unit	68	1.7 p/unit	80	1.7 p/unit	160			
Traffic	AM	34	0.74 trips/unit	19	PLTGDL	17	0.46 trips/unit	43			
	PM	29	0.99 trips/unit	25	PLTGDL	22	0.56 trips/unit	53			
	ADT	317	9.44 ADT/unit	236	PLTGDL	255	7.32 ADT/unit	687			
WA/SS	ERU	0.80	54.54	1.00	25.04	0.63	29.58	0.63	59.16		
Irrigation	Rate=	1 in/sf/week with a 30 wk growing season									
		263,494.96 gal/year	1,402,473.17 gal/year	637,487.80 gal/year	509,990.24 gal/year						
		0.26 MGPY	14.02 MGPY	6.37 MGPY	5.10 MGPY						

ITE Trip Generation
10th Edition
Average Rate Only

Note: All calculations are planning level based, See project folder for specific project information.

LI Comparison to MDR			
Zoning	MDR	LI	Difference
Density	47	68.17	-
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PM	22	29	-7
ADT	255	317	-62
Water	29.58	54.54	-24.96
Irrigation	6.37	0.26	6.11

Negative indicates a reduction in resources

	LDR	MDR	HDR	LI
Irrigation Area (sf)	74,989	34,086	27,269	13,634
Duration (wks/yr)	30	30	30	31
Rate	1 in/sf/week			
Volume	0.0833 ft/sf/week			
Area*Rate = Volume/Time				
cf/week	6,249.05	2,840.48	2,272.38	1,136.19
vol/time* duration = Total volume				
cf/yr	187,471.35	85,214.25	68,171.40	35,221.89
cf to gal	7.481			
gal/yr	1,402,473.17	637,487.80	509,990.24	263,494.96
MGPY	1.40	0.64	0.51	0.26