

Re: Comprehensive Plan Amendment 12-23 rezoning of parcels 36064.0122 and 36064.0104 from low density residential (LDR) to medium density residential (MDR)

Thank you for the opportunity to submit public comment on the Comprehensive Plan Amendment 12-23 which proposes changing the existing Low-Density Residential designation to Medium Density Residential on two parcels (numbers 36064.0104 and 3604.0122).

We note that The GMA Countywide Planning Policies for Spokane County, Statement of Principles (<https://www.spokanecounty.org/DocumentCenter/View/41048/Countywide-Planning-Policies?bidId=>) lists Citizen Participation, Neighborhood Character, and Aquifer Protection as the first three fundamentals for preservation and growth (copy attached). The zoning change in question has not adequately addressed these principles.

Citizen Participation: we (the surrounding neighbors along Mill Road) were not notified during the planning process per the 2022 Public Participation Program Guidelines (<https://www.spokanecounty.org/DocumentCenter/View/44184/Public-Participation-Program-Guidelines-2022?bidId=>). The GMA states that “a cornerstone of the Growth Management Act (GMA) is citizen participation”. That concept is first articulated in the GMA planning goals, specifically RCW 36.70A.020(11) which states that jurisdictions shall “...encourage the involvement of citizens in the planning process.” And that Spokane County must establish “...procedures providing for early and continuous public participation in the development and amendment of comprehensive land use plans and development regulations implementing such plans.” [RCW 36.70A.140 and WQAC 365-196-600]. From our perspective, this process was not followed for this rezoning proposal.

Instead, Whipple Engineering met with County officials and received tentative approval for a zoning change from LDR to MDR with no citizen participation from any of the surrounding neighborhoods. Public notice occurred only after erecting a sign that a hearing was to take place in 15 days. No bulk mailing was sent to any of the surrounding neighborhoods and a search of the Spokane newspaper by some neighbors did not reveal any public notice. Chapter 14.400 GENERAL PROCEDURES/Code of Ordinances governs these situations, and it appears that it was not followed, at least in spirit, if not in fact.

One of our neighbors happened to notice a sign that was placed near the parcels in question before the first public hearing. We are not sure when the sign was placed (the first public hearing was held Oct 12, 2023), and we had very little notice to prepare for the hearing. We were not notified in advance of any meetings or hearings between Whipple Engineering and the County Planners about this proposed rezoning change. Therefore, we had no knowledge of what was happening until the sign was posted. By the time we were aware of this proposed zoning change, our participation in the process was not possible due to the limited time before the public hearing. We believe it was already a fait accompli that the rezoning change was tacitly approved. And at the Oct 12, 2023 public hearing, the zoning change was unanimously approved by the commission, disregarding our objections.

We understand that increased housing density is the goal of the city of Spokane, County and the State of WA, and we are generally supportive. However, our goal is to preserve the integrity, character and value of our neighborhoods and the surrounding area along the Mill Road corridor.

Neighborhood Character: the surrounding area is mostly LDR zoning with notable exceptions. There are over 250 single family homes zoned LDR in the surrounding 1-mile area which includes Arrowhead Point, Wandermere Heights, Fairwood, Carriage House, Bozarth Center, Affinity, Mill Village Condos and Arrow Lane HOA. The neighborhoods surrounding Mill Road are a mixture of single-family homes, duplexes, a senior apartment building and multi-family housing. The recently constructed dwellings along this section of Mill Road blend in and complement each other, and the property values reflect this as well. A cursory review of the property values

along, and around, Mill Road are in the range of \$600,000-\$900,000 for single family homes, \$575,000 for condos, and \$400,000 for duplexes. All are well landscaped, the apartments have community swimming pools, play areas, dog parks and some have activity centers/clubhouses and vegetable gardens for residents. Please see the attached pictures to gain a better understanding of our neighborhoods.

The 2 parcels requesting zone changes are very near the center of Mill Road and our neighborhoods. A change from LDR to MDR would allow 39 units to be built on 2.6 acres. No other property on Mill Road comes close to that density.

Furthermore, Mill Road has properties that are most likely to turnover in the next several years. They were built many years ago and were some of the very first properties built in this area. Some have 1 single family residence on as much as 1.5 acres. As this natural turnover occurs, we are in favor of developments that fit in and enhance the current housing development and maintain or enhance property values along this section of Mill Road. We do however object to projects that are not compatible with the densities, quality construction, ample parking and landscaping that are currently part of our neighborhood. Keeping the LDR zoning still allows for as much as a 10 fold increase in unit densities, fits in with the changes that have already occurred on Mill Road and maintains property values.

Aquifer Protection: two issues of concern are parking and stormwater runoff. Mill Road is a busy corridor with a speed limit of 35 MPH, and we are concerned about off-street parking and setback from Mill Road. According to Spokane County zoning code Chapter 14.802, Table 802-1 Off-street parking requirements, multi-family dwellings are required to have one and one half spaces per dwelling unit, plus 5% of total requirement for guest parking. For a 39 unit apartment, this would require 61 parking spaces. Is there sufficient room on this 2.65 acres for the apartment building and parking? If the apartment is placed right next to Mill Road, are there sufficient safety protocols in place to protect the pedestrians and children from traffic on Mill Rd? Also, this apartment will potentially change the quality of the stormwater runoff into the Little Spokane River. There will be potential/probable leaks from the tenant's vehicles that will now be part of the stormwater runoff. Has an environmental impact study been completed, have the Friends of the Little Spokane River been notified and allowed to participate, and will this rezoning meet the guidelines and intent of the third principle (Aquifer Protection)?

It should be emphasized that the condos, duplexes and apartments in this area all have amenities including landscaping, community centers, parking and other amenities consistent with other properties along this section of Mill Road. We want more housing in Spokane, but we also want it to fit with and complement our existing neighborhood(s).

The GMA states that "a cornerstone of the Growth Management Act (GMA) is citizen participation". We are requesting that the decision to approve this rezoning be delayed so that the affected citizens in the Mill Road corridor can participate not only in this rezoning but also in the development planning for these parcels. To date, we have only been notified of the public hearings (at the last minute) but we have not been able to participate as mandated by the GMA, and we want to participate.

Respectfully submitted by the Arrowhead Point Homeowners Association,

Patrick Clark, Arrowhead Point HOA President

COUNTYWIDE PLANNING POLICIES FOR SPOKANE COUNTY

These principles, identified by the Steering Committee, are summarized below with a brief explanation of their importance.

Citizen Participation

Citizen participation occurred throughout the process of formulating the Countywide Planning Policies. The Steering Committee intends to also involve citizens in every aspect of policy implementation. The Countywide Planning Policies specify numerous responsibilities that the Steering Committee will need to fulfill (e.g., specifying minimal levels of urban governmental services and revisiting them, as needed, determining a date for submittal of Urban Growth Area [UGA] proposals for new jurisdictions and review of UGA updates and/or changes for existing jurisdictions). Citizens will be encouraged to be involved in each of these tasks and others to ensure the vision contained in the policies is maintained in the future.

Protection of Neighborhood Character

Spokane County has well-established neighborhoods, each with its unique identity and character. For most citizens, neighborhood character is one of the primary ingredients in their perceived quality of life. Although growth in the region is inevitable, it is the intent of these policies to maintain neighborhood character and prevent neighborhoods from becoming segmented, fragmented or degraded by that growth.

Aquifer Protection

Most of the Spokane area is dependent upon the same large aquifer for its drinking water supply. Protection of that water supply is vital for both the economic and physical health of the area. Aquifer protection is identified in several specific policies, and numerous other policies support and strengthen that philosophy. For example, the policies call for the construction of infrastructure that will protect designated aquifers.

<https://www.spokanecounty.org/DocumentCenter/View/41048/Countywide-Planning-Policies?bidId=>

Examples of neighborhoods that fit in with the character along Mill Road









Affinity at Mill Road Senior Living



Parcels 36064.0122 and 36064.0104

