



Whipple Consulting Engineers, Inc.

December 13, 2021  
WCE No. 21-3088

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

Attn: Saegen Neiman, Associate Planner

**Re: Farwell Road Comprehensive Plan Amendment (Cover Letter)  
Change from Low Density Residential to High Density Residential  
Approximate address 1605 E Farwell Road – a Principal Arterial  
Parcel Numbers 36043.0129 and 36043.0136, Spokane County, WA**

Dear Saegen:

Attached is the application, supporting documents, and the fee for the Farwell Road Comprehensive Plan Amendment, to change the current land use designation of a parcel from Low Density Residential (LDR) to High Density Residential (HDR).

The submitted material includes:

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

#### Narrative

With the recovery of the economy and the increase in demand for residential housing within Spokane County, there is also an increase in the need to develop properties to their highest and best use. The subject property is located on an Urban Principal Arterial within Spokane County and sits adjacent to both MDR and HDR zoned properties near commercial land uses making it an appropriate candidate for a High-Density Residential designation. The subject properties are currently designated as Low Density Residential, an adjacent parcel to the east is designated as Medium Density Residential, a parcel across Farwell Road is designated as High Density Residential, and the remaining surrounding properties are designated as Low Density Residential with the largest parcels including a church and a daycare facility. With a change from Low Density Residential to High Density Residential the 6.41 ac +/- parcels may be developed with 192 residential units within an apartment style of development.

The subject properties are located approximately 0.6 miles east of the Wandermere Shopping Center, there is adjacent sidewalk the length of Hastings and Farwell Roads. The subject properties are also approximately 0.1 miles +/- of the Northwood Middle School and 0.5 miles +/- from Farwell Elementary School.

**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 property has not been for sale until recently, which prompted this request to change the land use designation and zoning from Low Density Residential (LDR) to High Density Residential (HDR). With this change comes many benefits that helps to preserve the available resources and land within the Urban Growth Boundary (UGB). 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**

LDR Equivalent to HDR				
192	Units	8 units/ac	24.04	ac
Zoning		HDR	LDR*	Difference
Density		192	192	0
Persons	#	327	519	-192
Traffic	AM	88	142	-54
	PM	108	190	-83
	ADT	1408	1815	-408
Water	ERU	121.15	192.30	-71.15
Irrigation	MGPY	10.44	107.71	-97.26

ADT – Average Daily Trips ERU – Equivalent Residential Unit MGPY – Million Gallons Per Year
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**Negative indicates a reduction in resources**

The comparison of Table 1 Illustrates what would be needed to meet the same number of High-Density Residential (HDR) units with Low Density Residential (LDR) units. The First difference would be the amount of land in order to support 192 residential units, 24.04 acres of land would be needed, this would be over 3 times the amount of land of the subject properties. The LDR units would be able to support 192 more persons, but affordability is a question. In terms of traffic the HDR units would actually contribute less trips to the transportation system during peak commute hours, thus reducing transportation system impacts. The HDR units would also require less usage of potable. Some of the reason may be because there are less people, but another reason maybe, the use of potable water for the irrigation of green space. Where LDR unit developments typically have 55% of open space around the homes and within public spaces. Whereas HDR Unit developments only have about 20% of open space. The savings in potable water alone of 97 million gallons per year, means a reduction of cost in the pumping, treatment, and storage of water, for consumption.

## **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 the amendment has been meet under item 1 as the proposed amendment is not detrimental but is consistent with the goals and policies of the comprehensive plan. As well as under item 2 with the recent development of the Costco and supporting industrial uses in North Spokane near the north-south corridor.***

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 Low Density Residential to High Density Residential.***

## **APPLICATION SUPPORT INFORMATION**

2. 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 low density residential to high-density residential.**

### **Urban Land Use**

#### **General Goals**

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- 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 properties are designated as low density residential within the urban area of Spokane County between the Wandermere shopping center the North-south Corridor and Highway 2. With the proposed change the property would be allowed to be developed at a greater residential density with affordable housing that would 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 high-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 additional high-density residential zoning with access to Division Street, Highway 395. The north-south corridor highway and Highway 2 as well as other collectors and arterials that connect directly with the Industrial and commercial zones of North 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.

**By providing appropriate setbacks and landscaping, we intend for this project to be properly integrated into the community.**

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 multi-family residential development located within the proposed HDR zoning would provide a transition housing with 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 developments.**

- 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 developments.**

### **Viewscapes**

#### **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 is anticipated.**

### **Residential Land Use**

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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 additional 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 site in question lies near multiple economic employers on land zoned as Mixed Use and Regional Commercial that is also in proximity to Highway 2 and the north-south corridor highway. These employers will need workers and 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, additional residential housing will be needed- and especially affordable housing such as apartments, rowhouses and duplexes.**

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 low density residential.**

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, as an apartment, rowhouse or compact development, would facilitate this standard and would be an infill to the adjacent developed land.**

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 site 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 located near 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 a public sewer within Farwell Road**

### **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.

**A high-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 high-density residential area adjacent to low, medium, and high-density residential areas that are readily accessible to the transportation system and within the proximity of economic development within Mixed use and Regional Commercial zones around Highway 2.**

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 to amend the site to high-density residential would result in**



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**densities up to 30 dwelling units per acre.**

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

Sincerely,  
WHIPPLE CONSULTING ENGINEERS, INC.



Ben Goodmansen, E.I.T.

BNG/bng

Encl: Spokane Land Use Comparison Worksheet

<b>Development Guideline</b>	
Spokane County Zoning Code	

<b>WCE Worksheet</b>	
Date	12/13/2021
Proj. #	21-3088

	Percentage	(ac)	Percentage	(ac)	Percentage	(ac)
Open Green Space	55%	3.53	25%	1.60	20%	1.28
Storm	25%	1.60	40%	2.56	45%	2.88
rooftops	20%	1.28	35%	2.24	35%	2.24

Percentages Based Upon Project Averages.

	LDR		MDR		HDR	
	Rate	Value	Rate	Value	Rate	Value
Density	8 units/ ac	51	15 units/ ac	96	30 units/ac	192
Persons #	2.7 p/unit	138	1.7 p/unit	163	1.7 p/unit	327
Traffic	0.74 trips/unit	38	0.46 trips/unit	44	0.46 trips/unit	88
	0.99 trips/unit	51	0.56 trips/unit	54	0.56 trips/unit	108
WA/SS	9.44 ADT/unit	484	7.32 ADT/unit	704	7.32 ADT/unit	1,408
Rate=	1.00	51.28	0.63	60.57	0.63	121.15
	1 in/sf/week		with a	30 wk growing season		
Irrigation	2,872,157.51 gal/year		1,305,526.14 gal/year		1,044,420.91 gal/year	
	28.72 MGPY		13.06 MGPY		10.44 MGPY	

ITE Trip Generation  
10th Edition  
Average Rate Only

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

		LDR Equivalent to MDR		LDR Equivalent to HDR	
		8 units/ac	12.02 ac	8 units/ac	24.04 ac
96 Units					
Zoning	MDR	LDR*	Difference	HDR	LDR*
Density	96	96	0	192	192
Persons #	163	260	-96	327	519
Traffic	44	71	-27	88	142
	54	95	-41	108	190
	704	908	-204	1408	1815
Water	60.57	96.15	-35.58	121.15	192.30
Irrigation	13.06	53.85	-40.80	10.44	107.71
Negative indicates a reduction in resources					

		LDR Equivalent to MDR		LDR Equivalent to HDR	
		8 units/ac	12.02 ac	8 units/ac	24.04 ac
192 Units					
Zoning	MDR	LDR*	Difference	HDR	LDR*
Density	96	96	0	192	192
Persons #	163	260	-96	327	519
Traffic	44	71	-27	88	142
	54	95	-41	108	190
	704	908	-204	1408	1815
Water	60.57	96.15	-35.58	121.15	192.30
Irrigation	13.06	53.85	-40.80	10.44	107.71
Negative indicates a reduction in resources					

Irrigation Area (sf)		153,571
Duration (wks/yr)	Apr-Oct	30
Rate	1 in/sf/week	
	0.0833 ft/sf/week	
Volume		
Area * Rate = Volume/Time		
	12,797.57 cf/week	
vol/time * duration = Total volume		
	383,926.95 cf/yr	
cf to gal	7.481	
	<b>2,872,157.51 gal/yr</b>	

Irrigation Area (sf)		69,805
Duration (wks/yr)	Apr-Oct	30
Rate	1 in/sf/week	
	0.0833 ft/sf/week	
Volume		
Area * Rate = Volume/Time		
	5,817.08 cf/week	
vol/time * duration = Total volume		
	174,512.25 cf/yr	
cf to gal	7.481	
	<b>1,305,526.14 gal/yr</b>	

Irrigation Area (sf)		55,844
Duration (wks/yr)	Apr-Oct	30
Rate	1 in/sf/week	
	0.0833 ft/sf/week	
Volume		
Area * Rate = Volume/Time		
	4,653.66 cf/week	
vol/time * duration = Total volume		
	139,609.80 cf/yr	
cf to gal	7.481	
	<b>1,044,420.91 gal/yr</b>	

LDR Equivalent to MDR		
Irrigation Area (sf)		287,945
Duration (wks/yr)	Apr-Oct	30
Rate	1 in/sf/week	
	0.0833 ft/sf/week	
Volume		
Area * Rate = Volume/Time		
	23,995.43 cf/week	
vol/time * duration = Total volume		
	719,863.03 cf/yr	
cf to gal	7.481	
	5,385,295.34 gal/yr	
	<b>53.85 MGPY</b>	

LDR Equivalent to HDR		
Irrigation Area (sf)		575,890
Duration (wks/yr)	Apr-Oct	30
Rate	1 in/sf/week	
	0.0833 ft/sf/week	
Volume		
Area * Rate = Volume/Time		
	47,990.87 cf/week	
vol/time * duration = Total volume		
	1,439,726.06 cf/yr	
cf to gal	7.481	
	10,770,590.67 gal/yr	
	<b>107.71 MGPY</b>	