2023 Spokane County Comprehensive Plan Amendments Attachment C
Hello Scott. Just following up on our meeting. We will be sending a formal letter with follow-up comments before the end of the week. Our original letter addressed two issues.

First, we wanted to be sure the County was aware that City policy directs us to avoid serving water outside of the UGA. The concern is that this change would create an inconsistency due to the fact we serve some of the parcels in question with water. The City understands the County is choosing among several less-than-ideal options and we are supportive of the current proposal notwithstanding our concerns. We hope there will be an opportunity in the future for the County to reinstate UGA in the affected areas in order to bring them back into consistency with our policies.

Second, we had some concerns about the timeliness of sharing detailed information. We didn’t receive specific parcel numbers for the proposal until the notification that the public hearing was set. While we were aware of the general idea under consideration, it seemed premature to have issued a DNS and set a hearing date prior to us having enough detailed information to understand potential impacts to our water and sewer systems. Now that we’ve had some time to evaluate, we don’t anticipate any adverse impacts to our systems, other than the policy concerns noted above.

We appreciate the good working relationship we have with the County and look forward to further collaboration.

Regards,

Spencer Gardner | Director | Planning Services
Office 509-625-6097 | Mobile 509-723-7554 | my.spokanecity.org

-----Original Appointment-----
From: Gardner, Spencer <sgardner@spokanecity.org>
Sent: Tuesday, October 17, 2023 6:11 PM
To: Gardner, Spencer; Chesney, Scott; Freibott, Kevin; Black, Tirrell; Davis, Marcia; Richman, James
Cc: Pilgrim, Jessica
Subject: CPA-17-23
When: Tuesday, October 24, 2023 12:30 PM-1:00 PM (UTC-08:00) Pacific Time (US & Canada).
Where: Microsoft Teams Meeting

*Update* Moving this to Tuesday to accommodate Scott’s schedule.

Meeting to discuss the City’s concerns with County CPA-17-23. Let’s plan on virtual since this is sandwiched between other meetings for most of us.
Microsoft Teams meeting

Join on your computer, mobile app or room device
Click here to join the meeting

Meeting ID: 236 065 111 812
Passcode: BFNdpi
Download Teams | Join on the web

Join with a video conferencing device
cityofspokane@m.webex.com
Video Conference ID: 111 518 357 8
Alternate VTC instructions

Or call in (audio only)
+1 424-566-7556,,388996518# United States, Los Angeles
Phone Conference ID: 388 996 518#
Find a local number | Reset PIN

Learn More | Meeting options
From: Davis, Marcia
Sent: Friday, September 1, 2023 1:30 PM
To: Warwick, Joshua
Cc: Freibott, Kevin; Searl, Loren; Brock, Robert W.
Subject: RE: CPAs

Hello Joshua,
Loren shared this with me, and we are confused what you are requesting.

Kevin Freibott (cc’d on this email) is the point of contact at the City for all Comprehensive Plan Amendments. The City has responded to capacity concerns on CPA 02-22 Remand in August 2023 and the others in May 2023. Robert Brock will have all this information and it is on the County’s CPA website.

ICM Department analyzes the water system for future capacity. Our water system has multiple pressure zones supplied from multiple wells. Capacity to a parcel needs to take into consideration all the system components needed, planned developments, capital projects, and the demand anticipated from our 20-year water system analysis. Also, analysis is based on DOH requirements for MDD, PHD, and MDD plus fire flow not on a gallon per day basis.

If you have a specific question on one of these CPAs, please direct your questions through Kevin.

Marcia Davis, PE | ICM Director | City of Spokane
509.625.6398 Remote work contact: 509.570.4162

From: Warwick, Joshua <jWARWICK@SpokaneCounty.org>
Sent: Wednesday, August 30, 2023 9:18 AM
To: Searl, Loren <lsearl@spokanacity.org>
Subject: CPAs

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello Loren,

Here are the maps for the CPAs. I need to know if the system capacity in gallons per day for these areas and if it exceeds 261,070 gallons per day.

Best, Joshua Warwick

Sent from Mail for Windows
From: Freibott, Kevin  
Sent: Tuesday, September 19, 2023 9:06 AM  
To: Warwick, Joshua; Neiman, Saegen M.  
Subject: CPA Comments - Update

Good morning, Joshua. I didn’t want you to think we forgot about your request. At this time, the City has no capacity concerns regarding **CPA-07-23**. Our Water/Sewer departments expect that the proposal will not exceed our planned capacity for that site.

As for **CPA-17-23**, we cannot evaluate the expected demand or capacity to serve that proposal until we know (1) the current proposal, which I understand has changed recently and (2) the areas the UGA to be removed to accommodate adding this area to the UGA. I spoke briefly with Saegen yesterday and I understand some preliminary information will be coming in that area soon. However, I’m sorry to say we can’t do anything on our end until we know those two things.

Please let me know if you have any questions and have a great day!

Kevin

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Please note that my work schedule is currently 6:30 AM – 5:30 PM, Monday through Thursday.
October 10, 2023

Director Scott Chesney
Spokane County Building and Planning
1026 W Broadway Avenue
Spokane, WA 99260

RE: CPA-17-23 UGA Correction, City of Spokane Comments

Dear Mr. Brock,

Thank you for the opportunity to comment on the revised CPA-17-23 concerning a Urban Growth Area (UGA) correction north and west of the incorporated City boundaries. The City is commenting both as an adjacent jurisdiction and as a provider of urban services to both locations, as both the area to be added to the UGA and the area to be subtracted from the UGA are within our retail water service area and our sewer service area. The City of Spokane has not requested any UGA correction. Removal of properties that are currently served with urban services should be undertaken with great care and attention to potential impacts. It is possible that future expansion and maintenance of these areas would be impacted, as the city’s Comprehensive Plan prohibits the City from providing services outside of the UGA except in very limited situations.¹

On September 18, 2023, Mr. Freibott notified both the County and Mr. Warwick that the City couldn’t adequately determine the potential impacts of the UGA correction on our systems and services as the County still had not made clear which specific parts of the UGA would be impacted. Mr. Freibott reiterated our request for the specifics on September 19, 2023. However, it was not until the Hearing Notice and SEPA were issued on September 27, 2023 that we were informed specifically which parcels were proposed for removal from the UGA. Accordingly, the City has had very little time to prepare comments and was unable to provide input on the SEPA Environmental Checklist items relating to services provided by the City in advance of the issuance of the DNS.

¹ Reference Comprehensive Plan policy CFU 3.6 for details.
Given our abbreviated analysis, we strongly recommend that the County hold this proposal until the next cycle to allow for sufficient time for the County and City to consider the impacts of this proposal. With that in mind, please consider the following preliminary comments:

1. Because the City, as a service provider, was not informed of the parcels to be removed from the UGA, we request that the County rescind the SEPA determination to allow for additional time for the City to determine if any significant impacts would occur from this proposal. The SEPA Environmental Checklist could not have adequately considered impacts to the water and sewer systems that already serve this location, as the City is the service provider and was not provided with sufficient information to comment on potential impacts prior to issuance of the DNS.

2. A small parcel, entirely enclosed in those parcels to be removed from the UGA, seems to have been left out of the proposal—namely parcel 25143.9022. We suggest this may have been a clerical error—please confirm and amend your proposal to include this parcel if, in fact, the County seeks to remove this small property from the UGA. Likewise, there are several parcels between those listed for addition to the UGA in the staff report—please confirm these would be added to the UGA as well. They include:
   a. 26142.2601 thru .2605
   b. 26142.2701 thru .2710
   c. 26142.2801 and .2802
   d. 26142.2901 and .2902

3. While we understand that the area to be removed from the UGA is entirely owned by cemeteries, the County, environmental checklist, and staff report should note that these parcels are already provided with urban-scale services and utilities by the City of Spokane. If these parcels were to be removed from the UGA, that would not reduce the need for water and sewer service on these properties. This is most significant where water is concerned, as landscaping water (the primary water use of a cemetery) is by far the largest water demand on our system. The City cannot recommend removing parcels from the UGA that are already served by urban services and will continue to be so into the future.

4. While the majority of the Greenwood Memorial Park is developed as a cemetery, the northern portion of their property remains vacant and unused (see parcels 25143.9009 and 25154.9037). The County might wish to consider whether it is prudent to remove this area from potential future development.

5. It is our understanding that the Avista properties to the west of the City and the properties near the Beacon Hill area to the east will not be removed from the UGA, rather the County is proposing amendments to their next Land Capacity Analysis to indicate that those areas no longer provide population capacity for the County. As these areas are outside the City we have no comment at this time on their population capacity or any changes to it. However, were the County to seek to remove these properties from the UGA the City would have concerns. In both cases such an action would result in an island of land outside the UGA that is entirely surrounded by UGA. Such an action would seem to conflict with State law and would make
future possible annexation of these areas impossible, were the City to seek such an action in the future (no such action is currently planned).

If you have any questions regarding the above comments, please feel free to contact Kevin Freibott at kfreibott@spokanecity.org or by phone at 509-625-6184. Thank you again for the opportunity to comment on this proposal.

Sincerely,

Spencer Gardner
Director of Planning
City of Spokane
509-625-6500
sgardner@spokanecity.org

CC: Marcia Davis, City of Spokane Integrated Capital Management
   Elizabeth Schoedel, City of Spokane Attorney
   Kevin Freibott, Senior Planner
November 2, 2023

Director Scott Chesney
Spokane County Building and Planning
1026 W Broadway Avenue
Spokane, WA 99260

RE: CPA-17-23 City of Spokane Follow-Up Comments

Dear Mr. Chesney,

After further discussion through the Steering Committee of Elected Officials and meetings between City of Spokane and Spokane County staff, I believe it will be beneficial to submit follow-up comments to make clear the position of the City on the matter of CPA-17-23.

As a reminder, the City’s original letter addressed two issues. The first related to City policy which discourages water service outside of designated Urban Growth Area (UGA) boundaries. The second related to the timing of solicitation for public comments and information sharing between the County and City.

The City recognizes that the County is seeking to adjust boundaries to rectify other issues with the UGA, and also understands that this is a difficult choice between two suboptimal options. While our concerns about water service outside of UGA boundaries remain, we are supportive of the proposal as a necessary modification. It is the City’s desire that future UGA planning work can account for the inconsistency in City policy created by the proposal through reinstatement of UGA in affected areas served by City of Spokane water services at a later date. It is our understanding that this is the County’s intention.

On the question of information sharing, we appreciate having had an opportunity to discuss our concerns about the timeline of receiving information and having adequate opportunity to comment. As noted in our conversation, we didn’t receive specific parcel numbers for the proposal until notification that the public hearing was set. Affected departments and service providers at the City have now been able to
review the proposal and do not anticipate any adverse impacts to our utilities, other than the policy concerns noted above.

We appreciate the good working relationship we have with the County and look forward to further collaboration.

If you have any questions regarding the above comments, please feel free to contact Kevin Freibott at kfreibott@spokanecity.org or by phone at 509-625-6184. Thank you again for the opportunity to comment on this proposal.

Sincerely,

Spencer Gardner
Director of Planning
City of Spokane
509-625-6500
sgardner@spokanecity.org

CC: Marcia Davis, City of Spokane Integrated Capital Management
    Elizabeth Schoedel, City of Spokane Attorney
    Tirrell Black, Assistant Planning Director
    Kevin Freibott, Senior Planner