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Upper Columbia River Group

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July 17, 2006

Leroy Eadie
City of Spokane
Planning Services Department
808 W. Spokane Falls Blvd.
Spokane, WA 99201

Re: Kendall Yards

Dear Mr. Eadie,

Please accept these comments on the proposed Kendall Yards development. Sierra Club's Upper Columbia River Group is a 2,000-member organization dedicated to protecting and restoring the woods, waters and wildlife of the Inland Northwest. Our Spokane River Project focuses on protection and restoration of the Spokane River. Sierra Club members hike, bike, fish, paddle and generally use and enjoy the Spokane River. We write today because of the threat the Kendall Yards development poses to the unique and beautiful river corridor that defines the southern and western boundaries of the proposed project.

It is important to understand the values that the Spokane River brings to Spokane as it flows through the city. From Spokane Falls onward, the river flows through an undeveloped and fairly wild riparian corridor. From the Falls downstream this area has been dubbed the "Great Gorge Park" and is subject to a strategic master development plan that emphasizes the beauty and recreational values of the river. (Please see Friends of the Falls website, <http://www.friendsofthefalls.org/documents.asp?documentsubcatID=135&PageID=>). The gorge forms the southern boundary of the Kendall Yards site. North of the Westlink Bridge is a natural area of several acres that forms the western boundary of the site.

Only a small number of housing units abut the river. Not only is this unusual for a city, but it gives the river its wildness, the opportunity to flourish and provide habitat to fish, birds and other wildlife. Because the river gorge is wild to the city limits (and beyond), it serves as a route that brings wildlife into the city. Within a stone's throw of downtown, we share the river with deer, coyotes, moose, and all manner of wild birds (osprey, eagles, quail, flickers and many more) that one would normally not see in an urban setting. Moreover, a native redband rainbow trout fishery thrives in the cold waters that

are fed by the aquifer springs that flow out of the steep hillsides in the West Central neighborhood.

There is a semi-wild ecosystem here, in the city, thanks to the Spokane River. The City must protect it.

The river also provides refuge to the people of the city. The wild areas downstream of the falls are visited by river lovers – fishers, boaters, hikers, bird and wildlife watchers, and those who simply seek solace, peace, and the beauty that the river offers.. It is possible to be in the gorge, next to (or in) the river and be completely unaware of the city that surrounds you. It is extraordinary to have this type of asset within the urban boundary, much less within a mile of downtown. The City must protect it.

The Kendall Yards developer obviously places a partial value on the wild river that adjoins the site. The PUD application repeatedly states that the proposal will give the new Kendall Yards residents the opportunity for “great” or “spectacular” views of the river and its natural areas. But there is no mention of the wildlife, water quality, or the overall aesthetic amenities that the wild river corridor provides to the humans and creatures who visit there.

Nor is there discussion of the impacts of the proposed development on the river and its natural area. Indeed, the PUD application states that “these areas and uses will not be impacted by the project.” (PUD Application (1/13/06), Question No. 7). Similarly, the draft supplemental environmental impact statement for the project did not identify or discuss the negative impacts that the Kendall Yards project will bring to the river. It is clear that the developer values “vistas,” but not the wilderness, that the river represents.

The Kendall Yard project as envisioned by the PUD application will adversely impact the wild values of the Spokane River and its riparian corridor. These impacts are likely to include contaminated water runoff, light pollution, noise, hillside erosion, degradation and loss of riparian vegetation, wildlife harassment viewshed destruction, and pressure resulting generally from vastly increased use by Kendall Yards residents.

Kendall Yards proposes construction of towering condominiums (8-12 stories) overlooking the gorge and natural area. Structures this tall will destroy the quiet solitude and aesthetic beauty of the gorge. Sierra Club encourages all decision makers for this project to visit Westlink Bridge and walk around the associated natural areas, and look up. Then imagine looking at 12-story condos. While Kendall Yards residents might get a great view looking out, for those of us looking back, the view will not be so great.

The City’s PUD ordinance grants the type of flexibility that Kendall Yards seeks for this proposal, including “bonus densities,” but only if the proposal is compatible with surrounding uses. At this juncture, particularly given the failure of the Kendall Yards application and supporting documents to even acknowledge its off-site environmental impacts, it appears the Kendall Yards development will not be a compatible neighbor to the Spokane River.

The City of Spokane needs to address the deficiencies of the Kendall Yards application. First, the application should be rejected and returned to Kendall Yards with a request to study and develop an appropriate plan for protection of the river. Second, the City should take steps to ensure appropriate buffers between the development and the bluff. Third, the City should reject the proposal for high density development adjacent to the river bluff.

Finally, if and when the development receives final approval, the City should impose strict conditions to address each and every off-site environmental impact. Such conditions may include:

- Limited and well-defined points of egress and ingress to the river corridor and natural areas
- Paved or gravel pathways in the natural areas and along the river
- Muted lighting
- Native vegetation plantings within the development
- Strict stormwater controls – these may need to exceed state standards given the size and amount of paving involved
- Interpretive and cautionary signage
- Education for new residents of Kendall Yards
- Funding for water quality and environmental monitoring to assess future impacts and a dedicated bond requirement to ensure mitigation for such impacts can and will be funded

The Spokane River is a treasure. We request that the City treat it so.

Thank you for the opportunity to provide comments.

Sincerely,

Hal Rowe
Chairman
Upper Columbia River Group

cc: Mayor Dennis Hession