

... Making the community, our special interest!

35 W. Main, Suite 370 July 17, 2006

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

Re: Kendall Yards PUD

Dear Mr. Eadie:

Thank you for the opportunity to provide comments on the Kendall Yards PUD application. These comments are submitted on behalf of Neighborhood Alliance of Spokane. The goals of the Neighborhood Alliance include encouraging wise planning to create walkable communities while preserving our natural resources and our historic neighborhoods. These goals can be achieved only if there is true public participation.

The 80-acre parcel that comprises the proposed Kendall Yards development is a unique property in Spokane – a large, vacant in-city property that is defined by and adjacent to downtown, an historic neighborhood, and the Spokane River. Each of these aspects of the property speaks to the need for special treatment and conditions to ensure that Kendall Yards is, as the municipal code requires, compatible with surrounding land uses.

Kendall Yards representatives assert that the development is intended to be a progressive example of urban mixed-use planning. We applaud the notion of creating a pedestrian-friendly neighborhood that is attractive at street-level. However, we do have concerns with the proposal presented to the city for approval.

Transportation Planning

First, while Kendall Yards <u>says</u> it plans to create a progressive development, the documents and plans submitted to date don't reveal the level of detail necessary to ensure that is the case. On the contrary, the design review plans indicate a

standard street grid system that promotes automobile use. Focus has been on how cars can enter and exit the development at the Maple and Monroe bridges. We are concerned that there is no commitment to transit infrastructure and that there has been discussion of creating a couplet including Monroe. Couplets are not a way to resolve traffic problems, public transportation is.

If the City intends that Kendall Yards include alternatives to the usual automobile-centric approach to transportation – and especially if such options are intended to offset deviations from the underlying zoning – then the City must impose requirements on the project to make it happen. The development needs an internal pedestrian-bike-pathway system, speed limit controls, traffic circles and other traffic calming devices and strategies, transit infrastructure, appropriate parking controls, and so forth.

We cannot over-emphasize the importance of this aspect of the project. If not properly conditioned and developed, Kendall Yards holds potential to create traffic gridlock at the bridges and in the downtown area near city hall and the downtown mall. The development will also bring traffic impacts to the West Central neighborhood, which must be studied and addressed (see below).

Compatibility With Existing Neighborhoods

The Kendall Yards property, while held in single ownership by the developer, really encompasses two very different land use areas, as reflected in the underlying zoning for the site. The proposal to create a "mixed use" development and to intensify housing densities raises questions whether development on the west end will truly be compatible with the West Central, Peaceful Valley and Browne's Addition neighborhoods.

The developer has asked to increase residential density by 30%, from 21 to 28 dwelling units per acre. In addition, the developer apparently intends to include commercial space on the first and second floors of many buildings. Hence, most of the buildings in Kendall Yards will range from 5 stories up to 12. We question whether this level of intensive building is appropriate for the west portion of the Kendall Yards property, from Maple Bridge west, that borders on the West Central neighborhood. Large condominium towers on the far west end of the site may provide great views to the new residents, but will also be visible from throughout the city. Such intensive development is not consistent or compatible with existing housing in the area.

Protecting the Spokane River

The Spokane River gorge extending from the falls to the city limits and beyond, is a unique asset for the City of Spokane. It is an urban wilderness that provides habitat for birds and wildlife and an exceptional wild place for the city's residents. The developer's proposal to build 2600 residences with 5,000 new residents will

place extraordinary pressure on the river, adding to the ongoing increase in residential and recreational development up and down the river corridor. Authorizing intensive development atop the river corridor poses significant risk to this beautiful and valuable place.

We urge the City to think very carefully about how to protect the Spokane River and gorge from overuse. Appropriate pathways and river access points, restrictions on lighting, restrictions on pet (predator) access, native (drought-tolerant) vegetation planting requirements, stringent stormwater controls, and water quality monitoring are all appropriate conditions to prevent the degradation that will inevitably occur as a result of this development. We ask that the City undertake efforts to study the site and impose whatever conditions are necessary to preserve the river and its riparian corridor.

As discussed above, there will be an adverse aesthetic impact if the city permits construction of condominium towers over the gorge and natural areas.

Neighborhood Traffic

Transportation studies for the project have consistently failed to consider the impacts of increased traffic emanating from the Kendall Yards development on the West Central neighborhood. It seems likely that residents at the west end of Kendall Yards who are headed to or from destinations in the northwest part of the city will drive through the neighborhood. Yet there was no development of base line data on current neighborhood traffic patterns or projection of future impacts associated with the new development.

The City should rectify this data gap by requiring a neighborhood traffic study and imposing conditions necessary to maintain quiet streets, including traffic calming devices and strategies.

Thank you for your consideration of these comments.

Sincerely,

Lindell Haggin
Executive Director
Neighborhood Alliance of Spokane