

Summit-Bridge Alliance

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July 19, 2006

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

Re: Kendall Yards PUD and platting applications

Dear Mr. Eadie:

These comments are submitted on behalf of Summit-Bridge Alliance, an organization of West Central residents concerned about the Kendall Yards development. This letter provides detailed information about our concerns, along with specific proposals to improve the project.

We support Kendall Yards concept of creating a mixed use, urban village designed to promote non-motorized transportation. However, a fundamental deficiency of the PUD application is its notable lack of detail regarding the specifics of the proposed development. Indeed, it appears that the design plans submitted to the City are in conflict with the stated goals to create a progressive development. This problem is compounded by:

- (1) the failure of the City's Design Review Committee to make recommendations that speak to overarching issues, such as street design, transportation design, density, appropriate commercial-residential use ratios, etc., and
- (2) inadequate environmental review. The original Summit PUD EIS is stale and describes a project that differs substantially from the Kendall Yards proposal. The Supplemental EIS fails to properly describe the project or analyze impacts of concern to the neighborhood, especially traffic and Spokane River issues.

Hence, Spokane citizens are confronted with a proposal

- for one of (if not THE) largest in-fill developments ever contemplated in the city,
- on an extraordinary set of parcels of public interest and importance,
- with significant potential for adverse traffic, aesthetic, environmental and economic impacts,
- touting "smart growth" concepts as a basis for increased density and building heights

<u>but</u>, with few details to support how the purported benefits of the project justify significant changes in the underlying zoning and land use designations, along with the transfer of public property into ownership by the developer.

We reject the "trust us" approach to urban design. We respectfully request that the City:

- impose specific engineering and design requirements on the PUD
- limit the density and intensity of the development to ensure compatibility with the West Central neighborhood,
- retain public ownership of public properties,
- take special steps to ensure protection of the Spokane River,
- provide for affordable housing, and
- require mitigation for all adverse impacts of the project.

If the Kendall Yards developer is sincere in its expressed desire to create a new neighborhood based on principles of sustainable design and alternative transportation, then what we seek should be fully consistent with the developer's ideals.

1. West Central neighborhood traffic impacts

Issues:

At least seven of the north-south streets of the West Central neighborhood will connect into Kendall Yards, directly channeling traffic into the existing neighborhood. There is much discussion in the PUD application about promoting connectivity, and the Kendall Yards Design Review submittal clearly identifies the connections it intends to make. Despite the intent to connect and utilize West Central streets, the City and developer chose not to study the traffic impacts of the new development on the West Central Neighborhood. See Attachment 1.

The thousands of cars that enter and exit the Kendall Yards site each day will inevitably adversely impact the residential streets of our neighborhood. Kendall Yards residents and workers driving to northwest destinations (e.g., Spokane Falls Community College, Riverside Park, Joe Albi, Shadle Mall), will cut through West Central to access Pettit Drive rather than drive east to Maple and then backtrack.

Compounding automobile traffic issues is the existing and future bicycle and pedestrian use of West Central streets. Since the opening of Westlink Bridge, Summit Boulevard has become a de facto extension of the Centennial Trail and experiences heavy non-motorized use, reaching its apex with the Bloomsday run. Unfortunately, the roadway is current engineered in a manner that encourages speeding. Future conflicts between cars and people are inevitable, especially as Kendall Yards puts more traffic onto West Central streets.

We are also concerned about the potential for traffic associated with the "mixed use" proposal for Kendall Yards. The current proposal appears to create a commercial and retail district that will become a regional destination, attracting employee and shopper traffic from throughout the region. Some of this traffic will access the West Central neighborhood.

We are further concerned that the developer has significantly underestimated the number of car-trips that will be generated to and from the site. The Traffic Study projects 3,810 evening trips in 2025 (final build-out) (Traffic Study, p.77). The figure used by the traffic study authors is justified in part by assumptions that Kendall Yards residents and employees who work in the development will utilize alternative transportation options.

But, as discussed in Section 4 below (Alternative Transportation), the Kendall Yards design is not especially pedestrian friendly. Although the Traffic Study mentions "Travel Demand Management" as a strategy (Traffic Study, pp. 75-76), it contains no real analysis of how strategies such as "marketing programs" or "alternative work scheduling" would be implemented. Nor has Kendall Yards made specific commitments to ensure that transit options will be available to residents and workers.

Finally, of course, we are concerned about unacceptable traffic impacts to various arterials and intersections that border the West Central neighborhood. Frankly, we believe the Kendall Yards development, as proposed, holds potential to create gridlock at the bridges and along the arterials that will serve the project. It is incumbent upon the City to carefully assess and provide solutions for these problem <u>before</u> Spokane is transformed into a Seattle-style traffic nightmare.

Remedies:

Require the developer to conduct a baseline study of existing traffic patterns in the West Central neighborhood that will serve as a basis to identify future impacts and craft appropriate mitigation, and require implementation.

Require the developer to fund traffic mitigation in the West Central neighborhood including, but not limited to:

- street tree planting where needed
- curb extensions and bulb outs
- traffic circles, roundabouts, short medians and speed tables
- striped bicycle lanes on through streets that connect West Central to Kendall Yards
- separated bicycle lanes and sidewalks on Summit Blvd.

Please see Attachment 2 for examples of traffic calming strategies that are appropriate for mitigating the impact of Kendall Yards traffic on West Central streets.

In addition, the City should takes steps to control traffic in the neighborhood including

- closing West Point Drive to through traffic (although providing for local access)
- reducing the speed limit on Summit to 20 mph

2. Impacts to the Spokane River corridor and natural areas

Issues:

The Kendall Yards site is bounded on the south and west by the Spokane River. The uniquely wild character of the Spokane River as it flows from Spokane Falls downstream is an extraordinary asset and resource for the community. Unless explicitly and thoughtfully protected, this beautiful, valuable river and riparian zone will be lost to Spokane.

As is evident from multiple statements in the PUD application, the developer intends to take advantage of the views and public amenities that exist as a result of this advantageous geography. What the developer fails to do, however, is acknowledge that Kendall Yards will have an adverse impact on the River and its riparian corridor. Indeed the PUD application asserts that the development will have "no impact" on the river. This assertion is ridiculous. One cannot put 2600 residences (or 1,300 as the existing zoning allows in the western end

of the project) on top of a river corridor, along with thousands of new residents, and assume that all will be well.

It is incumbent upon the City to protect the Spokane River corridor. The City should take the following actions to ensure protection of the river.

Remedies:

The City should develop and implement a pro-active plan to protect the Spokane river, including creation of a "river influence area" that explicitly acknowledges and requires mitigation for impacts associated with upland development on the river corridor.

The City should retain the Ohio and Summit right-of-ways on the perimeter of the Kendall Yards site and dedicate them to a buffer zone between the Kendall Yards development and the edge of the bluff.

The City should require the developer to investigate, identify and provide specific mitigation for the specific impacts of increased population pressures on the river, including:

- Limited and well-defined points of egress and ingress between the development and the river corridor and natural areas
- Paved or gravel pathways in the natural areas and along the river to absorb increased use by walkers
- Substantial controls on lighting within the development to minimize impacts on nocturnal wildlife, to preserve the night sky which is visible along that portion of the river, and to improve energy efficiency (see the International Dark Sky Assn's website: www.darksky.org/index). See Attachment 3 (lighting guidelines).
- Native, drought tolerant vegetation plantings within the Kendall Yards development
- Strict stormwater controls to ensure that runoff does not escape the development and harm water quality in the river
- Interpretive and cautionary signage
- Education for new residents of Kendall Yards to promote understanding of the natural values of the river and its corridor
- An impact fee dedicated to 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 City should reference and utilize the Great Gorge Park guidelines for Habitat Preservation and Restoration and Green Infrastructure, contained in the Strategic Master Plan for the Spokane River corridor. See Attachment 4.

3. Zoning Issues

Issues:

Increased Densities

We are opposed to the proposal to substantially increase density and building heights in the portion of the Kendall Yards site west of Maple Bridge, which represent a radical departure from the existing zoning.

Above all else, the Kendall Yards development must be compatible with surrounding land use. Towers of eight to twelve stories sitting along the river bluff are not compatible with any of the surrounding neighborhoods, and are certainly not compatible with the natural setting of the Spokane River. Towers on the west end and along the river bluff would create visual blight for the community that enjoys the natural amenities that the Spokane River affords.

Further, the numbers don't add up. The developer proposes a density of 28.3 dwelling units (DU) per acre which, when multiplied by 78 acres, totals 2207 residences. If the developer is proposing an additional 400 units based on "bonus density" provisions, there is nothing in the application to satisfy the criteria of the municipal code. As discussed below, the pedestrian-friendly, "urban village" concepts extolled by the developer are simply not borne out in the documents submitted in support of the application. Indeed some aspects of the proposal seem to contradict concepts of sustainable, livable community design.

To the extent Kendall Yards seeks to transfer credit for higher densities on the east side (Monroe to Maple) to the west end of the project, this is inappropriate. The two parcels are fundamentally different – in their zoning, in their orientation (on the east toward downtown, on the west as part of the neighborhoods and Spokane River natural areas), and in appropriate expectations regarding developability.

Who will live and work in Kendall Yards? What analysis has been done to indicate that there is the economic base and market demand for thousands of high-end condominiums and apartments? Why does the developer need more than the existing 21.8 dwelling unit/acre density, which is already significantly higher than the housing density found in the neighboring West Central district?

Street Vacation

We are opposed to vacating the right of way for Ohio and Summit streets as they wrap around the Kendall Yards site. The elimination of automobile traffic on these streets is not objectionable, but the City should retain control of these public properties and maintain them as a buffer zone to protect the Spokane River and its riparian corridor.

Street vacation is also inappropriate because it eliminates public access. The point above West Link Bridge and adjoining public lands are heavily used by the public. If the City vacates Ohio, then what about public parking and handicap access to river trails? How will people access the Centennial Trail that will replace Ohio? There is no public parking plan currently. Is the expectation that people will simply park cars in a long line down Summit Boulevard?

We are concerned about creating semi-public spaces that are not retained in the City's control. In reality, promises made today may be promises broken tomorrow – private developers are not in the business of providing for the common good. A good example is the Parkade garage. When initially built, this development had a public space, water feature, and gathering space where people gathered to eat lunch. However, when the owner became angry about skateboards he had the power to put spikes on the benches, basically shutting down this privately owned but publicly used space.

Mixed Use

We are opposed to a change in zoning that would allow significant amounts of non-local commercial and retail space west of Maple Bridge. We are not opposed to mixed land use that is focused on providing goods, services and amenities to neighborhood residents, but given the proposed square footage, it is apparent this is not what the developer has in mind. Local population (even the outsized population proposed by the developer) is simply not adequate to support the proposed commercial space.

Open Space

The open space concepts offered by Kendall Yards are not adequate to support increased densities in the neighborhood. We do appreciate the proposal to create public plazas opening to the river corridor. Given the size of the development, one would expect to see public parks and other common open spaces. Are the plazas intended to substitute for these types of public amenities? If so, they are not appropriate to serve as a basis for increased height and density. Further, street tree "amenity strips" do help to create more appealing and walkable streets, but they are not "open space" and should not be credited as a basis to increase density – particularly since it appears that most of the parcels in the development will not have yards or other green space.

Nor should density bonuses be awarded for open space in areas that are now in public ownership but for which Kendall Yards seeks private ownership. We are excited to see the extension of Centennial Trail, but wouldn't this extension be constructed regardless of the ownership of the property, particularly given its prominence in the Great Gorge Strategic Master Plan?

The existing zoning for the project provides sufficient density for the area. We do not oppose flexibility to allow for clustered housing and appropriate mixed land uses and a slightly stepped up building profile toward the center of the site, but we do oppose buildings at heights exceeding current limits, especially along the entire perimeter of the development.

The City Beautiful

In 1907, the newly created Spokane Park Board hired the nation's premier landscape architects, the Olmsted Brothers, to prepare a detailed, written report with accompanying maps completed in 1908 and published in 1913 by the Board of Park Commissioners. See Attachment 5. The significance of the Olmsted report to Spokane's history and future cannot be underestimated.

The Olmsted's were especially enthusiastic about the Gorge Park:

Nothing is so firmly impressed on the mind of the visitor to Spokane, as regards its appearance, as the great gorge into which the river falls near the center of the city. It is a tremendous feature of the landscape and one which is rarer in a large city than river, lake, bay or mountain. Any city should prize and preserve its great landscape features, inasmuch as they give it individuality. . .

Regarding the side proposed for the Kendall Yards Development, the Olmsted's wrote,

The whole north slope is exceedingly conspicuous to a great many people, and its preservation as a beauty spot would certainly be widely appreciated. ... On the right bank the boundary should be on the top of the bluff, to include a boundary road, which, however, would be adjust to the railroad about to be built there . . .

The Olmsteds advocated acquiring control of land to protect the scenic views of the river, noting that

as the city grows in density of population, even the smallest areas ... will afford extremely valuable places where the people can go to enjoy the view of the river. ... Far too often valuable opportunities of that sort have been permitted to be lost by cities on rivers or other waters.

The Olmsteds further recommended Spokane restrict building height in residential areas to three or four stories:

In residence districts a restriction to four stories in height for buildings with brick or stone outer walls and three stories for those with outer walls of wood, can probably be passed now and will later prove decidedly beneficial.

The Olmsted recommendations formed the basis for much of Spokane's development for decades to follow. Although much of the falls and gorge area had already been claimed by industrial and residential uses, the Olmsteds urged the city to preserve "what beauty and grandeur remains of its great river gorge," and provided an outline of what might occur if the opportunity for such a park ever arose.

We believe it is appropriate for the City to look back one hundred years and consider a guiding vision for the Spokane River corridor, as it prepares to make decisions that will affect the next one hundred years (or more) in this area.

Remedies:

Deny Kendall Yards request for a 30% increase in dwelling unit density and bonus densities.

Limit building heights to current zoning requirement of 35 feet at all points along the perimeter of the development – ie, not just Bridge Street, but also along the Spokane River bluff. For height increases above the zone limit, require building to "step up" toward the interior. Do not allow buildings higher than 4 to 5 stories west of Maple, and only in the center of the new development.

Engage in a proactive, City-driven planning process to determine appropriate public access and control over the viewpoints along the bluff above the Spokane River and connectivity to other public lands, including the Centennial Trail, Westlink Bridge, Great Gorge master plan projects, and the natural areas adjacent to the Kendall Yards site.

Reject the proposal to vacate streets. The City should retain control of all existing public properties. Under no circumstances should current streets be vacated, turned over to private use, and then utilized as "public space" benefit to support increased densities.

Impose conditions to ensure appropriate parking and public access to the Centennial Trail.

Impose public use and access dedication requirements on public plazas, nodes, and view corridors and overlooks.

Limit the square footage available for commercial and retail development west of Maple Bridge and prohibit uses that are inconsistent with those that provide goods, services and office space for Kendall Yards residents.

4. Alternative transportation

Issues:

Kendall Yards has stated repeatedly, in many documents and public forums, that the development is intended to be pedestrian friendly and oriented toward alternative transportation use. We applaud and support this vision. Our concern, however is that the promise of progressive development that promotes alternative transportation is not borne out in the documents prepared by the developer.

Attached is a copy of "Street Design Guidelines for Healthy Neighborhoods." Prepared by the Center for Livable Communities, "Healthy Streets" contains 25 key elements of street design to guide planners and engineers who seek to create attractive, walkable, safe streets. Attachment 6, pp. 28-40. We encourage the City to carefully examine these guidelines and incorporate them into the decisions and permits authorizing development.

Kendall Yards' Design Review submittal offers nothing exceptional in terms of nonautomobile movement. A comparison of the "automobile access," "pedestrian circulation" and "bicycle circulation" illustrations in the submittal reveals that cars will have more access to parts of the development than will people on foot and bike. This is opposite the philosophy of healthy streets, in which "pedestrian and bicycle movements are favored." Att. 6, p. 12. There are few paths within the Kendall Yards development and those simply connect areas where street vacations are proposed. Additional or dedicated foot/bike routes over and above the standard street grid are absent.

We agree that the proposed development is (roughly) the right size for a walkable community – but we frankly question whether residents will in fact walk from the west end to downtown in winter weather. Truly the development will need to incorporate specific, focused, appropriate design to coax people out of their cars. Transit options are essential, yet absent in the developer's materials.

There is a lack of detail that makes it impossible to know whether basic, well-engineered solutions that promote pedestrian use will be present. The Healthy Streets guidelines call for a diverse street mix, narrow streets, short blocks – all absent from the Design Review submittal.

We oppose the proposal to vacate rights-of-way for various streets within the development. Pedestrian friendly neighborhoods contain more interconnected streets, lanes, trails, pathways and connecting routes, not fewer. Block lengths are shorter, not longer. See Attachment 6, pp. 28-29. Vacation of Elm, Oak and Cannon Streets will create long blocks that are at odds with the stated "essential purpose" of Kendall Yards to be pedestrian friendly.

Remedies:

Require Kendall Yards to develop an appropriate pedestrian and bicycle pathway system that will create connectivity and non-motorized access and circulation throughout the project.

Require Kendall Yards to re-design the street system to create shorter blocks (300 to 500 feet maximum) and tee intersections to control automobile movement and speeding and promote walkability.

Deny the street vacation proposals and dedicate the proposed southern and western street vacations to publicly owned public space that serves to buffer the Spokane River bluff.

Narrow the street lanes on Type 2 and 3 streets.

Incorporate engineering standards into street design that slow automobile traffic and emphasize the primacy of non-motorized use.

Require Kendall Yards to install transit infrastructure, including trolley lines, and to fund and maintain private transit options within the development until commitments from STA can be established and substitute for private solutions.

5. Sustainable design

Kendall Yards provides the developer and the City of Spokane a unique opportunity to create a world class sustainable development. Utilizing principles of sustainability in the design and construction of Kendall Yards will put Spokane on the map as a progressive and highly livable city. Black Rock and the City should be commended for already fulfilling some major principles of low impact sustainability: reclaiming and in-filling an urban brownfield, for mixed use development. Adding certifiable, sustainable, "human friendly" (as opposed to "car friendly"), and environmentally friendly practices, that are energy efficient and cost effective could make Kendall Yards a true success story.

We offer here a brief overview of some basic principles of sustainability, including examples of how these principles could be incorporated into Kendall Yards. In a nutshell – sustainability equals the "3 E's": it protects the environment, is economically viable, and promotes social equity, sometimes called the "triple bottom-line." We propose that Kendall Yards integrate the following sustainable principles into its development to (1) preserve and strengthen the quality of the natural environment, (2) include affordable housing units and ensure strong connectivity with the West Central neighborhood and its residents, and (3) prioritize local businesses for development contracts and in the future for occupancy in the Kendall Yards commercial centers.

Specific examples include:

Neighborhood Diversity

 As discussed below, incorporate a mix of affordable housing units into the development for low- and middle-income people Encourage mobility of Kendall Yards residents and existing West Central residents across neighborhood boundaries

Construction

- Balance cut and fills.
- Use recycled, renewable, and/or local materials. (How about using the art-deco panels from the soon to be leveled Rookery building?) Use the boulders and conglomerate slabs, now on site, as landscape features and check dams in bioswales.
- Use local contractors favor contractors with "green" certification and/or experience.
- Incorporate passive solar design

Stormwater Management (See Green Infrastructure Guidelines, Attachment 4)

- Collect stormwater in mosquito free cisterns, for reuse in watering landscaping and habitat plantings
- Use bio-swales to filter percolating stormwater on site
- Use permeable paving and porous asphalt
- Eliminate some curbs, where compatible with safe street design, to allow sheet flow runoff into bio-swales
- Construct "green" roofs
- Include alternative energy such as photovoltaic options in residential and commercial zettings.

Landscape

- Maximize xeriscaping and native landscape plantings to enhance habitat (birds, etc.) and to reduce use of water, fertilizer, pesticides
- Use drought tolerant turf, native plants, and clump plantings by drought tolerance for efficient water use
- Use recycled stormwater for irrigation
- Plant many street trees. Use some older/larger trees keep at least SOME indigenous trees that pre-date Kendall Yards
- Create *public* green spaces for gathering, recreation, and bike and pedestrian trails within the development (accessible to all community residents)
- Minimize light pollution while providing adequate lighting for transit stops, walkways (See Attachment 3 and see: www.scn.org/darksky/code/wa/redmond.pdf)

Getting Around

- Incorporate traffic calming devices (see Attachment 2)
- Install frequent transit stops, protected from weather, with art and/or plantings
- Create covered and secure bicycle parking

This is a short list of suggestions for sustainable design. We encourage and challenge the developer to utilize these principles in creating a model sustainable neighborhood.

6. Preservation of low income housing

Issues:

The low to middle-income character of the West Central neighborhood is at risk. The Kendall Yards project is contributing to a speculative housing market and prices and property taxes are rising quickly. Oddly, the Kendall Yards PUD application states that it is consistent with the city comprehensive plan because its "moderate to higher income housing would provide balance to the low and moderate income housing that comprises West Central." It appears the opposite may be true, that Kendall Yards will contribute to the elimination of affordable housing in West Central.

West Central is a diverse neighborhood that supports low and moderate income families (including single-parent families), group homes for disabled persons, and immigrants. We enjoy and care for our neighborhood, and are concerned about losing the social, ethnic and economic diversity that defines us, as well as the general opportunities West Central afford to lower-income families to own their own homes. See Attachment 7 (recent Spokesman-Review articles discussing changes in the neighborhood).

We are also concerned about the potential for real estate developers to purchase and raze older homes and replace them with apartment buildings – a real possibility given the high density zoning on the southern end of the neighborhood.

As noted in Patrick Malone's PUD comment letter to the City, date July 14, 2006, the original Summit PUD proposal included a 10 percent low income set-aside. No such proposal or concept is contained in the Kendall Yards application.

Remedies:

Require the developer to incorporate a reasonable percentage of affordable housing into the Kendall Yards development.

The City should undertake an immediate study to determine, and then implement, <u>stopgap</u> measures to protect housing diversity in the West Central neighborhood. Please take steps to correct the problem before it is too late.

The City should fund and facilitate a comprehensive feasibility study to identify specific offsite affordable and low-income housing options that leverage federal, state and local resources and reinvest in, stabilize, preserve and develop housing diversity in West Central and associated neighborhoods. Options include

- Use of low income housing tax credits
- Promotion of homeownership programs (low interest mortgages, down payment assistance, education)
- Tax financing for for-profit and nonprofit housing providers
- See Spokane Low Income Housing Consortium for more information (http://www.slihc.org/)

Assess an impact fee or real estate transfer tax on the sale of residential units in Kendall Yards and dedicate that funding to the aforementioned affordable housing feasibility study and implementation plan.

7. Air quality

Issues:

The Kendall Yards site is a large, empty dirt lot and will be so for between 5 and 15 years according to the developer's documents. While it was necessary to move earth around for the brownfields cleanup, what is left are dirt piles that are drying out in the hot weather, dust storms in the making. West Central residents are concerned about dirt, dust, and particulate matter blowing off the site because of lack of air quality controls.

SCAPCA submitted a letter in the EIS process outlining air quality control requirements during the construction phase. See Attachment 8. However, no permit is required. By personal communication with SCAPCA staff, the agency will not take action unless and until a problem occurs and the community complains.

Remedies:

Explicitly incorporate the SCAPCA requirements into City permits.

Require Kendall Yards to plant a (non-invasive, non-seeding) vegetative cover crop over those portions of the site that are not scheduled for construction within six months, started no later than autumn 2006.

Restrict construction traffic to avoid West Central streets.

We thank you for the opportunity provide comments on the Kendall Yards PUD application and look forward to working with the City and the developer to create a sustainable project.

Yours truly,

John Osborn Summit-Bridge Alliance

cc: Mayor Dennis Hession

List of Attachments:

- Attachment 1: Kendall Yards PUD Design Review Submittal, Exhibit 7.0, Street Hierarchy Illustration and Kendall Yards Traffic Study (May 2006), Figure 3 (Study Area)
- Attachment 2: Traffic Calming Strategies (Community Partners, LLC)
- Attachment 3: Guidance Notes for the Reduction of Obtrusive Light (The Institution of Lighting Engineers, 2005)
- Attachment 4: Great Spokane River Gorge Park, Strategic Master Plan, Appendices D, Habitat Preservation and Restoration Guidelines and Appendix E, Green Infrastructure Guidelines
- Attachment 5: Spokane Board of Park Commissioners, Olmsted Brothers report (Annual Report 1891-1913)

- Attachment 6: Street Design Guidelines for Healthy Neighborhoods (Center for Livable Communities, January 2002)
- Attachment 7: Don & Barbara McBride, "Work with residents, not against them" (Spokesman-Review Guest Opinion, April 25, 2006); "Affordable No Longer?" (Spokesman-Review, July 5, 2006).
- Attachment 8: Spokane County Air Pollution Control Authority, SCAPCA Requirements for Kendall Yards PUD (March 9, 2006).