

**To:** Ryan Benzie

**City of Spokane, Development Services Center**

**Re:** SEPA Request for Comments – St. Agnes Haven Project (Permit #B2508588SEPA)

**Location:** 2834 W Sunset Blvd, Spokane, WA 99224

**Date:** June 12, 2025

Dear Mr. Benzie,

On behalf of the **West Hills Neighborhood Council**, we submit the following comments in response to the SEPA Checklist and related documents for the **St. Agnes Haven** development proposed at 2834 W Sunset Blvd. These comments reflect significant and recurring environmental concerns identified by residents of our neighborhood and formally voted upon during our regularly scheduled meeting on **June 10, 2025**. The council agreed unanimously that each of these issues warrants careful review and mitigation before the City proceeds with a Determination of Non-Significance (DNS).

It is also important to note that many of the concerns listed below—particularly those regarding pedestrian safety and the condition of the Sunset Boulevard Bridge—have previously been raised directly with Catholic Charities during multiple public meetings, including the April 8, 2025 community meeting.

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### **1. Sunset Boulevard Bridge – Structural Integrity and Emergency Egress**

The Sunset Boulevard bridge—immediately adjacent to the proposed development—has known structural concerns, including visible deterioration and lane reductions over recent years. While a recent inspection may have deemed the bridge safe, it is commonly understood that the bridge requires substantial repair and has been identified by the City as a priority for future infrastructure investment.

**Environmental Concern:** The Trip Generation letter references an increase of 182 daily trips to and from the site. We do not believe that this trip generation letter adequately addresses the increased load on the Sunset Bridge specifically. Increased vehicle traffic from the proposed 48-unit development would compound the load on this deteriorating bridge. More critically, the bridge serves as a vital evacuation route during wildfires and other emergencies—a role that was reinforced during recent fire events and evacuation drills. The added vehicular load could compromise emergency response and evacuation in future high-risk fire seasons. If the bridge is not repaired before the project moves forward, a closure for repair, combined with new development-driven traffic, could impair the region's emergency responsiveness.

**Council Position:** We ask that the SEPA review condition this project on the scheduled rehabilitation or reinforcement of the Sunset Boulevard bridge to mitigate foreseeable environmental risk associated with traffic congestion and emergency egress. The current condition of this vital piece of infrastructure makes the area unsuitable for increased residential density at this time.

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## 2. Pedestrian Safety at Sunset Blvd and Government Way

The intersection of Sunset Blvd and Government Way poses a serious pedestrian safety issue. The sidewalk at the Northeast corner currently has an extremely narrow sidewalk, insufficient for safe pedestrian use—particularly where transit riders wait to cross or access the nearby bus stop (located roughly 170 feet from the intersection on the southeast side of the road). This location already sees high foot traffic due to adjacent commercial establishments. This is especially problematic for those accessing the nearby bus stop and convenience store, where frequent crossings occur outside of controlled intersections.

**Environmental Concern:** Inadequate pedestrian infrastructure will be exacerbated by increased foot traffic from new residents. The result may be increased pedestrian-vehicle conflicts, higher accident potential, and reduced non-motorized mobility. The lack of adequate pedestrian infrastructure is inconsistent with Spokane’s goals for safe, walkable neighborhoods.

**Council Position:** Improvements to the sidewalk width, pedestrian crossing visibility, and traffic calming measures should be required as part of the SEPA mitigation process. This concern was directly communicated to Catholic Charities at the April 8 meeting, and appear unaddressed in the current site plan.

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## 3. Conflict Between Vehicular Access and Recreational Trail Use

The current vehicular access point to the property is shared with Catholic Charities' existing entrance, which crosses a paved trail utilized daily by pedestrians, cyclists, and runners. This trail is a critical connector between the Fish Lake Trail and broader recreational and commuting infrastructure, including the Lewis and Clark Trail.

**Environmental Concern:** The increased volume of vehicular traffic crossing the recreational trail, referenced in the trip generation report, endangers non-motorized users and undermines the intended environmental and health benefits of such recreational spaces.

**Council Position:** We recommend that vehicle access be moved to the **northeast corner of the site along the vacated segment of 7th Avenue**, which would reduce conflicts with the trail and better preserve its environmental and recreational value.

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## 4. Future Use and Environmental Spillover

The project’s proximity to sensitive public lands such as High Bridge Park, People’s Park, and the Fish Lake Trail raises concerns about long-term environmental impacts from overflow behaviors. Comparable developments operated by Catholic Charities have demonstrated patterns of environmental degradation in the form of increased littering, unauthorized camping, abandoned vehicles, and long-term street parking adjacent to the property.

**Environmental Concern:** These patterns contribute to fire risk, degradation of natural open spaces, diminished park usability, and increased human waste management challenges. Such

impacts extend beyond aesthetics and directly affect the ecological and public health quality of these areas.

**Council Position:** We ask the City to require a long-term stewardship and property management plan to address litter control, fire risk mitigation, and sanitation. This should include coordination with the Spokane Parks Department and a commitment from the applicant to support enforcement or stewardship mechanisms.

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## 5. Stormwater and Contamination of Latah Creek

Catholic Charities has stated in the SEPA Checklist that:

“Stormwater runoff will be collected and treated on-site. The geotechnical engineer has recommended against on-site infiltration due to shallow bedrock and areas of contaminated soil. The project proposes to discharge to the City storm system at a metered rate.”

We appreciate the commitment to on-site collection and metered discharge. However, several environmental risks remain:

- **Mobilization of Existing Contamination:** The acknowledgment of shallow bedrock and contaminated soils presents environmental risk during construction. Ground disturbance could mobilize pollutants, and routing discharge into the municipal system without on-site infiltration reduces opportunities for natural filtration.
- **Overflow Activities on A Street:** Past experience around comparable facilities has shown increases in overflow parking, illegal dumping, and littering. This property is situated atop ‘A’ Street, which slopes steeply toward Latah Creek. Stormwater from this area may carry motor oil, antifreeze, solid waste, and other pollutants downhill during rain events—ultimately affecting water quality in Latah Creek and the Spokane River.
- **Ongoing Use Patterns:** The SEPA Checklist does not detail how these long-term risks will be addressed through design or management. The presence of contaminated soils increases the burden of responsibly managing stormwater throughout the life of the development.

### **Council Position:**

We request that further analysis of the off-site impact to stormwater and runoff be considered in addition to the onsite retention of stormwater. We request that a comprehensive response to both on-site contamination concerns as well as the concerns associated with the future use of the property be created and address commitments that will ensure the protection of the waterways downhill of the development.

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## Final Recommendation

The **West Hills Neighborhood Council** believes these concerns are grounded in legitimate environmental and infrastructure-based risks and should be fully addressed before any determination is made on project significance under SEPA. We respectfully request that the City of Spokane either withhold a Determination of Non-Significance or attach meaningful mitigation conditions that respond to the points outlined above.

We are committed to working constructively with both the City and Catholic Charities to ensure that development in our community proceeds in a way that protects public safety, preserves environmental quality, and respects existing infrastructure limitations.

Sincerely,

**West Hills Neighborhood Council**

Robert Thompson, Chair

[whnc99224@gmail.com](mailto:whnc99224@gmail.com)

cc: West Hills Neighborhood Council Executive Board

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**WHNC Response B2508588SEPA - St. Agnes Haven - Request for Comments**

6 messages

**Robert Thompson** <rtcorderomail@gmail.com>

13 June 2025 at 13:44

To: "Benzie, Ryan" &lt;rbenzie@spokanecity.org&gt;

Cc: Ryan Oelrich &lt;ryanoelrich1@gmail.com&gt;, Paul Bundy &lt;pfbandy0@gmail.com&gt;, Joy Peltier &lt;joypeltier@gmail.com&gt;, Bryn McNabb &lt;brynmcnabb@yahoo.com&gt;, Kathy Hagy &lt;onwalls@yahoo.com&gt;, Michael Gifford &lt;mshkg@hotmail.com&gt;, "Ramos, Virginia" &lt;vramos@spokanecity.org&gt;, "Dillon, Paul" &lt;Pdillon@spokanecity.org&gt;, agrageda@spokanecity.org

Hello Mr. Ryan Benzie,

Please find attached the SEPA comment response from West Hills Neighborhood Council.

Please let me know if there is any further information we can provide.

Robert C Thompson

**WHNC SEPA -B2508588SEPA - St. Agnes Haven - Request for Comments.pdf**

107K

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**Benzie, Ryan** <rbenzie@spokanecity.org>

13 June 2025 at 14:06

To: Robert Thompson &lt;rtcorderomail@gmail.com&gt;

Cc: Ryan Oelrich &lt;ryanoelrich1@gmail.com&gt;, Paul Bundy &lt;pfbandy0@gmail.com&gt;, Joy Peltier &lt;joypeltier@gmail.com&gt;, Bryn McNabb &lt;brynmcnabb@yahoo.com&gt;, Kathy Hagy &lt;onwalls@yahoo.com&gt;, Michael Gifford &lt;mshkg@hotmail.com&gt;, "Ramos, Virginia" &lt;vramos@spokanecity.org&gt;, "Dillon, Paul" &lt;pdillon@spokanecity.org&gt;, "Grageda, Andres" &lt;agrageda@spokanecity.org&gt;

Good afternoon Mr. Thompson,

Thank you for providing your comments. Given their comprehensive nature and the request for mitigation, I am going to forward these to our relevant reviewing departments for a response.

I believe some of these concerns may be alleviated during the permitting process based on the comments previously received from our Integrated Capital Management department. The vehicular and pedestrian access concerns have been noted in their comments in particular.

Once I hear more, I will reach out to you. Have a great weekend.

Thank you,





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**From:** Robert Thompson <rtcorderomail@gmail.com>

**Sent:** Friday, June 13, 2025 1:45 PM

**To:** Benzie, Ryan <rbenzie@spokanecity.org>

**Cc:** Ryan Oelrich <ryanoelrich1@gmail.com>; Paul Bundy <pfbundy0@gmail.com>; Joy Peltier <joypeltier@gmail.com>; Bryn McNabb <brynmcnabb@yahoo.com>; Kathy Hagy <onwalls@yahoo.com>; Michael Gifford <mshkg@hotmail.com>; Ramos, Virginia <vramos@spokanecity.org>; Dillon, Paul <pdillon@spokanecity.org>; Grageda, Andres <agrageda@spokanecity.org>

**Subject:** WHNC Response B2508588SEPA - St. Agnes Haven - Request for Comments

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Hello Mr. Ryan Benzie,

Please find attached the SEPA comment response from West Hills Neighborhood Council.

Please let me know if there is any further information we can provide.

Robert C Thompson

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**Benzie, Ryan** <rbenzie@spokanecity.org>

16 June 2025 at 10:35

To: Robert Thompson <rtcorderomail@gmail.com>

Cc: Ryan Oelrich <ryanoelrich1@gmail.com>, Paul Bundy <pfbundy0@gmail.com>, Joy Peltier <joypeltier@gmail.com>, Bryn McNabb <brynmcnabb@yahoo.com>, Kathy Hagy <onwalls@yahoo.com>, Michael Gifford <mshkg@hotmail.com>, "Ramos, Virginia" <vramos@spokanecity.org>, "Dillon, Paul" <pdillon@spokanecity.org>, "Grageda, Andres" <agrageda@spokanecity.org>

Good morning Mr. Thompson,

Please see below for the City's response to the West Hills Neighborhood Council comment letter regarding the St. Agnes Haven SEPA review:

1. Restrictions on the Sunset Boulevard bridge are determined by the weight of the trucks rather than the overall volume of vehicles. Additional passenger vehicles will not impact the load rating. Load limits are already in place for certain types of trucks. The City inspects the bridge on 24 month intervals and will adjust the load limits with the next inspection if needed.
2. The northeast corner of Sunset/Government Way will be modified with the Fish Lake Trail project, which is planned for 2026 construction. The current design will replace the westbound right turn lane with a bumpout, providing a larger waiting area for cyclists and pedestrians before crossing Sunset Boulevard.
3. The City agrees with the concern over conflicts between trail users and the driveway and has already commented on this to the developer. We are requesting a driveway from Sunset or 7<sup>th</sup>-Hartson and

may close or restrict the access on Government Way.

4. The City is committed to upholding and enforcing the requirements outlined in Title 10, Title 12 and Title 17 of the Spokane Municipal Code. While it is not within the scope of this process to mitigate perceived or potential future violations of these codes, City code enforcement and parks staff is dedicated to maintaining a safe and healthy environment for the citizens of Spokane.
5. Stormwater treatment is subject to the requirements of the Spokane Regional Stormwater Manual and stormwater treatment will be reviewed as part of the building permitting process for this project. The City has not formally reviewed this project beyond SEPA compliance and future conditions may apply at the time of permitting as it relates to stormwater treatment.

At this time, the City is not proposing specific SEPA mitigation to address these issues. It is our belief that these issues will be resolved during the building permitting process after the close of SEPA review. I want to thank you for bringing these concerns to our attention as it does assist the various reviewing departments at the time of permit review and provides context that may otherwise be unavailable.

Please feel free to reach out with any questions or concerns.

Thank you,



**Ryan Benzie** | Planning Specialist / SEPA Coordinator | Development Services Center

