



From: Andrew Rolwes, Downtown Spokane Partnership
To: Supporters of lifting height and mass restrictions on Spokane Falls Blvd
RE: Talking points; lifting height and mass restrictions in DTC-100 parcels

For nearly ten years, parcels in the DTC-100 zone of Spokane Falls Blvd have been under development restrictions, allowing new buildings to be built only to 100 feet and requiring a 15' step back for each successive floor, to preclude shadows from falling on Riverfront Park. At the same time, the surface parking lots subject to these restrictions were designated as high-priority locations to foster development as "Downtown Opportunity Sites" 2 & 3 in the Downtown Plan Update. After almost a decade of trying to develop these surface lots, the owners of the parcels and the Board of Directors of the Downtown Spokane Partnership have determined that the height/mass restrictions and the parcel's designations as Opportunity Sites are self-contradictory and have appealed to the City Council and Plan Commission for their removal or at least reduction. These restrictions are contrary to community's vision of a downtown which "contains the highest density and intensity of land use, and continues to be a targeted area for additional infill housing opportunities and neighborhood amenities to create a more livable experience" (City of Spokane [Comprehensive Plan](#) Land Use chapter, p.3-21).

- **Housing:** Removing these arbitrary restrictions opens up opportunities for more housing in the downtown core. Residential vacancy in the downtown core is extremely low (less than 2%) and yet, the development industry has not been able to meet market demand, producing at most three hundred units over the past few years. Arguing for restrictions, or only allowing for a minimal increase in buildable area (the 11,000sf floor plate option) could prevent additional much-needed residential units in the core.
- **Workforce Housing:** Use of the multi-family tax exemption increases the possibility that a portion of the housing provided at residential development in these parcels would be workforce housing. In order to increase the chances of workforce housing at this location, as much buildable area as possible should be provided to the owner/developer. Again, arbitrarily restricting buildable area based on an argument that a modest increase in wintertime shadowing is detrimental, is an argument against more workforce housing in downtown.
- **Hospitality development:** At last week's meeting of the Visit Spokane National Customer Advisory Board, its members stated directly and repeatedly that demand for hospitality development in downtown is by no means exhausted, even with the completion of the Grand Hotel. When asked what it would take to continue to grow our visitor and convention volume, they responded; develop a national brand hotel in close proximity to the convention center. With the bonds released for the Sportsplex, there is now all the more reason to consider keeping the community's options open so that we can further build tourism. Arbitrarily restricting floor plate would close the door to opportunities like a major national brand hotel.
- **Housing mix:** Downtown's current residential mix is massively weighted toward low-income and subsidized housing. Developers just recently started to build workforce housing in downtown once again with only a fraction of needed units coming online recently or slated for completion in the near term. Thriving downtowns require a diverse mix of residential options at all price points and this is one of the best locations to provide housing options starting at the middle tier.

- **Safety and security:** A safe, secure park is a successful park. Providing the maximum possible floorplate is Riverfront Park's leading opportunity to build new mixed use development that would place hundreds of daytime workers across the street from the park during the weekday, and dozens (if not more) residents across the park in the evenings and on weekends. Successful urban parks achieve success for many reasons, and this is a pre-eminent opportunity to address the concerns about safety and security raised several times in the Riverfront Park Master Plan.
- **Shade is actually good for Riverfront Park:**
 - It helps to extend the season at the ice ribbon
 - Direct sunlight tends to remove dissolved oxygen, which is why they reside in shade and deeper water: it is cooler and contains more oxygen.
- **Public benefit:** The benefit to the public from removing restrictions is the opportunity to activate the park with mixed-use development containing a strong residential component. In order to maximize the benefit, maximize the floor plate.
- **Infill Development:** These arbitrary restrictions represent suburban policy in our downtown core. It is actually possible to build taller than the current standards in the non-downtown Employment Centers in the City of Spokane – 150' is allowed!
- **Parking lots:**
 - While parking lots are an important part of downtown's transportation system, surface parking lots are not the most reflective of good design or the highest form of land use that should occur across the street from downtown's crown jewel, Riverfront Park. Providing even a small increase of buildable area (the 11,000sf option) increases the risk that development still will not "pencil" and we will continue to have surface parking lots at these locations for years more.
 - Many respondents to the City's on-line survey decried the possible loss of parking at these lots, but development of structured parking is a strong possibility within replacement structures. Besides, what reflects the quality of downtown's crown jewel better; great buildings, or surface parking lots?
- **Change the approach in order to get better results:** If the community is serious about density in downtown, there is not better opportunity to demonstrate that commitment than to reverse policies that have kept these parcels frozen in asphalt for the past almost decade.
- **Nine years of lost opportunity:** Downtown have given arbitrary restrictions nine years to work: they have not.
- **Central City Line:**
 - A substantial mixed-use development at the SF Blvd surface lots is tailor made to support the viability and success of the planned Central City Line (CCL), which would run right next to developments at these sites. Strong mixed use development on transit lines support the success of the line and foster development elsewhere on the line.

- These two parcels were specifically identified in the CCL economic development analysis as opportunities for development as a result of CCL, which will not be possible under the present limitations.
- **Building shadows:** In the peak use summer months, shadows from buildings that are built to 250 barely cross the curb into Riverfront Park and in the winter, while there would be increased shadows, much of the south bank of the river is already shadowed by existing buildings, that is the 30% of the days in winter when the city is not already under clouds.
- **Land use:**
 - The ability to develop these parcels to their greatest extent reduces demand for dense development in less dense residential neighborhoods. Those who are concerned about densification in residential neighborhoods should welcome the opportunity to develop in downtown, particularly on these sites.
 - From the City's Comprehensive Plan to the State's Growth Management Act, downtown is called to be the place where tall, dense development happens. More development in downtown means less development pressure in neighborhoods and open land on the urban periphery.
 - The existing restrictions and even a small increase in allowance for floor plates (the 11,000 or 12,000sf option) amounts to suburban policy for downtown: allow downtown to be downtown by providing for the largest possible floor plate.
 - Of the 30+% of downtown that is devoted to surface parking, it is a very small number of property owners who are willing to take the risk in the near term to build up: we should allow for increased height and density where doing so is realistic.
- **Flexibility:** Provide developers the flexibility they need to meet market demand, don't continue to handcuff them with arbitrary restrictions built on the unverifiable notion that modest wintertime shadowing from buildings is somehow detrimental to urban parks.
- **Floor plates and economies of scale:** Large floorplates make buildings viable. This policy is not about providing the developer a larger profit margin, it is about allowing a larger number of tenants to share in the costs common to tall buildings. A larger floor plate = lower rents per square foot, and a more successful building, and the more likely investors will develop the site.
- **Park activation:** A true mixed use building places people right at the doorstep of the park during the weekdays in daytime and on evenings and weekends. This means more patronage of the attractions on the south bank of the river and more feet in and eyes on the park 24/7: hundreds of people watching the park, day and night.
- **Retaining and attracting new businesses:** The daily downtown workforce is about 33,000 people. They shop, eat at restaurants and stay for night life. This number should grow larger but due to insufficiently large space in the downtown office market (as well as parking), growing businesses like Next IT and Etailz have selected for suburban office parks in the Valley. It is imperative that we create new opportunities for attractive mixed use office space, as well as residential in the downtown core, and the DTC-100 parcels are precisely the locations to do that, but only if they are provided a large enough floor plate.

- **It is imperative that every buildable parcel in downtown be used to it's best and highest use, and policy preventing that be reversed:** Cities across the western US are making tremendous strides in attracting capital to their downtown cores, and more importantly than capital, they are attracting all generational cohorts, including millennials who strongly favor high quality, mixed use development like what is possible at these parcels. Spokane is competing directly against successful, growing cities on the coast and further inland for limited capital and talent. These opportunity sites could be some of the most outstanding urban developments in the region. They will be subject to design review and will receive more community attention than just about any other building in downtown has ever received. The community is more than welcome to "trust but verify" that unshackling these parcels results in a project the entire community can get behind and be proud of.
- **A thriving region must have dynamic, growing downtown at its heart:** The community must be willing to take risks in order to grow and provide great opportunities for those who already reside here and those who will one day decide to call Spokane home. This is a risk that communities which are dynamic, vibrant and growing take. Opting for the largest floor plate is the type of decision communities make, which keep recent grads, allows existing business to grow and attracts new businesses. It is one of the best decisions we can make to set the stage for the entire region to grow.

What does the community want for Riverfront Park? This?



Or this?

