

## Comments on Comp Plan Update Chapter 4: Transportation

### Please remove the Ray Street Crossover from the Draft Arterial Plan Map (TR 12)

The Draft Arterial Plan Map shows a project described as the “Ray Street Crossover” on the arterial plan map. This would be a primarily auto-oriented route through the campus of Ferris High School to speed up the access of vehicles from Ray Street to Freya Street and south on Freya Street to unincorporated areas.

This concept was abandoned during the Southgate Neighborhood Planning process around 2008. With the concurrence of the then-current Senior Traffic Planning engineer, the city-adopted Southgate Neighborhood Connectivity Plan did not include the Ray Street Crossover. The city council adopted this plan by resolution in 2012, and had also adopted the current CIP program which removed all funding from the crossover project.

The Neighborhood Plan suggests signalization improvements at the intersections of 37<sup>th</sup> and Ray and 37<sup>th</sup> and Freya to better manage the flow of vehicular traffic and increase capacity by those means. These signals are included as part of the draft 2017 Impact Ordinance Fee project list. This signal-only alternative reduces impacts on Ferris High School, on a neighborhood open space, Hazel’s Creek, and is undoubtedly less costly.

The signal-only option also reduces impacts on Regal Street. Staff analysis (presented at Southgate Neighborhood Council’s June meeting) of the signals plan vs the Crossover shows that fewer vehicle would be attracted to Freya Street, but the LOS stayed within the acceptable range for District Centers.

Below we outline our rationale in suggesting this more conservative approach to managing traffic in our neighborhood:

**Excessive Cost.** The proposed 2017 amendments to the Impact Fee Ordinance project list includes cost estimates for the Crossover as well as the neighborhood-preferred signalization. The cost for the traffic signals is shown as \$250,000 each (\$500,000 total). The estimated cost of the Connector is \$4 Million. **The connector would cost eight times what the signal improvements would cost.**

**Excess Capacity.** In addition to the larger cost, the Crossover likely exceeds actual needed traffic capacity. As documented in the *City of Spokane 2017-2037 Comprehensive Plan Update EIS Addendum*, the projected City **population growth by 2037 was recently adjusted downward** from an expected 68,800 new residents by 2037 to an expected growth of 20,859 new residents based on historical and recent trends. This new figure is **49,102 persons (69%) LESS than originally planned for.**

The *EIS Addendum* notes that: *This decrease in the population forecast is important to point out, in that the City’s 2006 Comprehensive Plan has resulted in planning efforts that exceed the realized growth. In other words, we have planned for more capacity than is*

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**actually needed.** Excess capacity is expensive, and creating it is not a good use of taxpayer dollars.

**Land Use/Future Development.** Staff has presented (undoubtedly) the same information on potential developments in the Southgate area (both inside and outside of the city limits) as was recently presented to the Southgate Neighborhood Council. This potential growth is used to support the need for the Connector. Local knowledge indicates that several of the largest potential development sites (Bauer Farm, KXLY “Tower” properties) are not actually likely to develop or some site indicated as “developable” already have buildings on them (such as the Palouse Trails Apartments). In any case an overall 69% lower expected population growth casts doubt on the assumption that all the vacant properties will develop by 2037.

**Capacity and the District Center.** Street/intersection capacity is planned at various *Levels of Service (LOS)* with designations from A thru F. The Comprehensive Plan and other documents indicate the planned & desired levels of service for different areas and land uses.

In 2009 the Council approved the designation of the Southgate District Center near the intersection of Palouse Hwy. and Regal Street. As the Council knows, the planned LOS for district Centers is “E,” where delays and congestion are allowable. This is also sensible, as District Centers are planned to be “Mini-Downtowns,” where traffic is expected. And traffic is desirable because that same traffic is desired by the businesses that located in the Centers, as it brings customers. This is especially true since the current Center and Corridor regulations allow highly auto oriented development in our most pedestrian oriented zones.

In this context, creating excess capacity on Freya, AWAY from Regal will not increase the LOS above the planned level but only draw away the very traffic that is desired by the merchants.

**Sprawl and the Crossover.** Reducing urban sprawl is one of the state Growth Managing Act’s key land use goals. Considering that the SRTC model that includes the Crossover expects Freya to attract up to 19,000 vehicle trips per day (double current volumes) where are these vehicles going? They are clearly “modeled” to reach not only more distant locations, but the “undeveloped” areas mentioned earlier, quite a few of which are outside city limits. Developing in these locations at any density is the essence of sprawl.

In addition, many of the recently built, edge-of-town uses outside city limits are high intensity residential, including below-market rate and other affordable apartments, with residents likely in need of services that are distant from these locations. Spatially isolating people from needed services is also a characteristic of sprawl.

The City Comprehensive Plan’s vision is that such uses be located in District Centers with life needs and services in walkable distances. This the vision that supports the GMA goal of reducing sprawl.

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In regards to the Crossover, spending City dollars to increase the ease of accessing these edge-city areas not only fuels sprawl, but works against the goals the City has in place to reduce or prevent sprawl.

Furthermore, as we have seen historically, as soon as access to these edge areas increases, there will be pressure (or traffic models) to increase access even further from the city core.

In Spokane, we have the goals in place to reverse this trend, but we need to act on and implement them. Projects such as the Connector do not prevent sprawl - they perpetuate it.

**Summary/Request.** For all of the above reasons, the Southgate Neighborhood requests that the proposed crossover be removed from the Arterial Map. The deletion of this project would also support proposed TR Goal E of the new Comprehensive Plan: “*Evaluate transportation projects using objective criteria to reflect community standards and desires.*” (Comp Plan, 2017, pg. 4-15)