



Request for Appeal or Reconsideration

Application

Rev.20170927

Please answer each question completely. If more space is needed, attach additional paper.

Appellant:

Name: Dennis P Flynn (on behalf of attached list of "Concerned Citizens")
 Address: 2108 W Euclid Ave Spokane, WA 99205
 Phone: 509 325 9097 Email: dpflynn@hotmail.com

Respondent:

Name: City of Spokane
 Address: 800 W Spokane Falls Blvd Spokane, WA 99201-3329
 Phone: _____ Email: _____

File Number (of application or permit, if applicable): Z23-587 PPLT

This is an appeal or reconsideration of:

- Hearing Examiner
- Planning Commission
- City Engineer
- City Council
- Junk Vehicle Determination
- Planning Director
- Director of Building
- Traffic Engineer
- Homeless Encampment Decision
- Other: _____

This is an appeal or reconsideration to the:

- City Council
- Planning Examiner
- Hearing Examiner
- Other: _____

What is the decision being appealed or request for reconsideration?

(i.e. approval or denial of a special permit or issuance of a building permit, etc.)

SEPA DNS (Determination of non-significance)**Why is the decision wrong?** Error or misinterpretation of FACT Error in PROCEDURE Error or misinterpretation of LAW or COMPREHENSIVE PLAN

Please identify the specific factual, legal or procedural errors or misinterpretations that you believe resulted in the decision being wrong and how correcting the error would result in a different decision. If you believe a misinterpretation of the law or Comprehensive Plan or procedural error was made, please identify the specific laws, code sections or plan policies that you believe were misapplied, misinterpreted, or violated:

See sheets attached hereon and
incorporated by reference

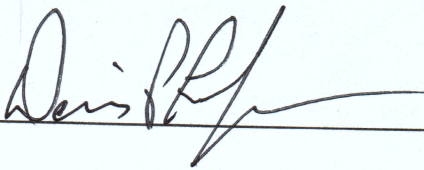
What is the harm to you resulting from the decision?

Degradation of my neighborhood, and irreparable
harm to protected Critical Areas and wildlife

What relief do you seek? What would you have the decision maker do?

Rescind DNS and issue DS (Determination of
Significance), with subsequent preparation of
EIS (Environmental Impact Statement)

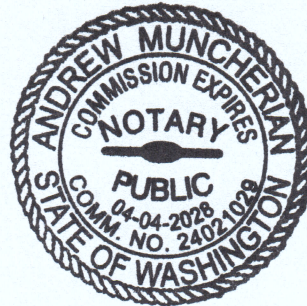
SUBMITTED BY:

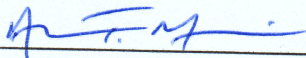
Dennis P Flynn 

ACKNOWLEDGEMENT

I certify that I know or have satisfactory evidence that Dennis P. Flynn signed this instrument and acknowledged it to be his/her own free and voluntary act for the uses and purposes mentioned in this instrument.

DATE: 3/7/2025





Notary Public in and for the City of Spokane,
State of Washington
My commission expires: 4/4/2028

For Staff Use Only

Date appeal filed:
Was appeal timely filed?
Appeal fee?
Transcript fee?

Date appeal period ends:
Is appellant a party of record?
Fee paid?
Fee paid?

SEPA Determination of Non-Significance should be rescinded for the following reasons:

1. The use of an "alley" or "driveway" in place of a residential street/ roadway is prohibited by city codes and design standards.
 - a. SMC 17A.020.160
 - b. SMC 17A.020.180
 - c. SMC 17G.080.070
 - d. SMC 17C.111.205
 - e. SMC 17C.111.210
 - f. SMC.17C.111.225
 - g. SMC 17C.111.315
 - h. SMC 17C.111.335
 - i. SMC 17C.230.145
 - j. SMC 17C.230.130
 - k. SMC 17D.050A.040
 - l. SMC 17D.050A.050
 - m. SMC 17H.010.020
 - n. SMC 17H.010.030
 - o. SMC 17H.010.060
 - p. SMC 17H.010.070
 - q. SMC 17H.010.080
 - r. SMC 17H.010.090
 - s. SMC 17H.010.120
 - t. SMC 17H.010.130
 - u. SMC 17G.080.065
 - v. City of Spokane Design Standards (Nov 1, 2020)
 - w. ORD C36296; ORD C36629; ORD C36556
2. Developmental Bonuses do not apply to proposed development site.
 - a. SMC 17A.020.130
 - b. SMC 17C.111.225
3. Development does not provide pedestrian access to public sidewalk for lots 1-10.
 - a. Interim Zoning Code 17C.400.030(D)
 - b. SMC 17H.010.080
 - c. SMC 17H.010.020
4. Development will cause significant adverse impacts on multiple critical areas on or near the proposed site.
 - a. WAC 197-11-600
 - b. SMC 17A.020
 - c. SMC 17A.202.2
 - d. SMC 17E.010
 - e. SMC 17E.020

- e. SMC 17E.020
- f. SMC 17E.040
- g. SMC 17E.050
- h. SMC 17E.070
- i. Wetland Guidance for Critical Areas Ordinance (CAO) Updates (Oct 2022)
- j. Wetlands in Washington State Vol.2 Guidance for Protecting and Managing Wetlands (2005)

Appellant reserves the right to supplement the above statutes prior to appeal hearing.

Concerned Citizens - Ash Place Proposed Townhouse Neighborhood - Contact List

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Concerned Citizens - Ash Place Proposed Townhouse Neighborhood - Contact List

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