



Spokane UD Code Audit

DTU and GC-150 Zones

July 2025



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Detailed Barrier Breakdowns

Project Overview

Goals and Intent

- Identify regulatory barriers to desired development types within the primary zone districts of the University District area, specifically the GC and DTU zones
- Meet with developers and architects to identify and confirm barriers to development



Zones Within The UD

Parcel

University District

Zones

DTU -
Downtown University

DTG, -70-
Downtown General

DTS-
Downtown South

GC-150-
General Commercial

CB-150-
Community Business

CC1-EC-
Center and Corridor 1

CA1-
Context Area 1

R1-
Residential 1

RMF-
Residential Multifamily

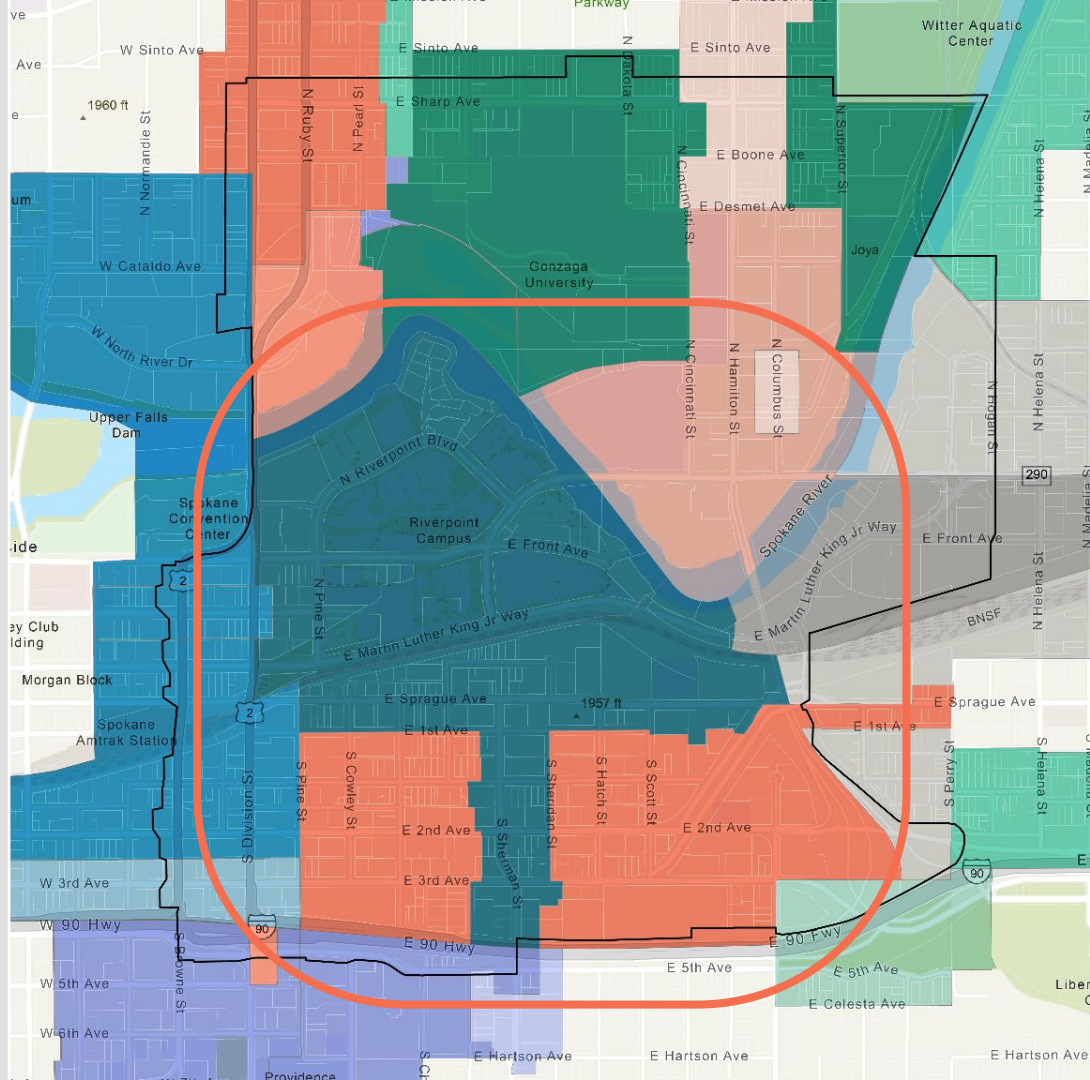
RHD-55, 75-
Residential High Density

O-35-
Office

OR-55, 150-
Office Retail


LI-
Light Industrial

HI-
Heavy Industrial



Study Area

 Parcel

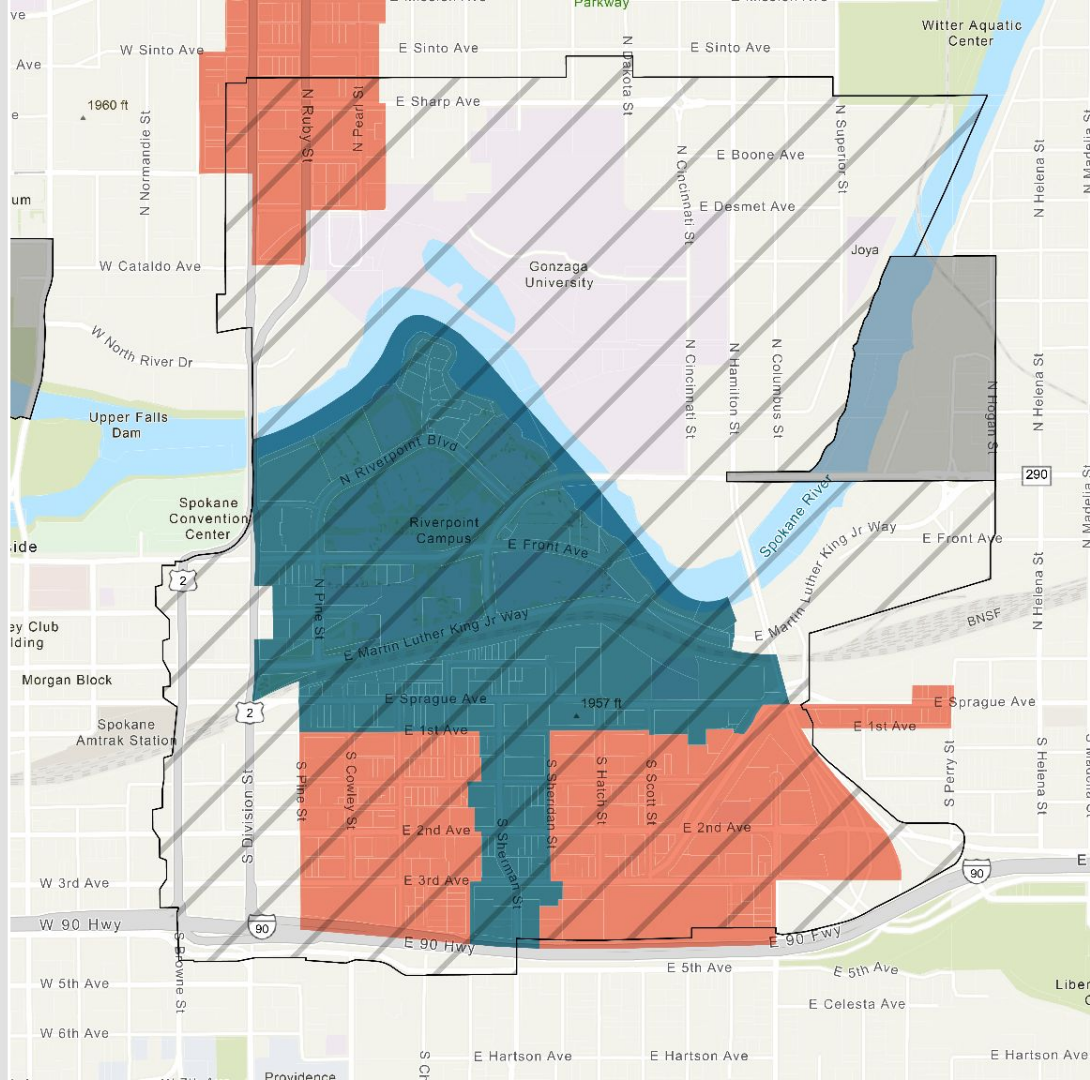
 Public Development Authority & Tax Increment Financing (TIF) District

 Tax Increment Financing (TIF) District Only

Zones

 General Commercial

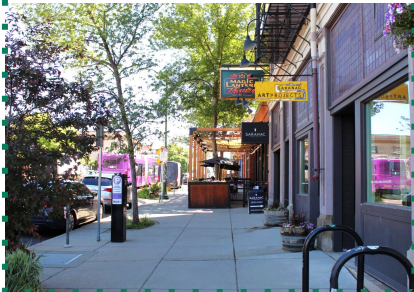
 Downtown University



Overall University District Development Goals

Walkable Development & Placekeeping

Wayfinding, amenities, wide sidewalks, complete streets.



Futurewise

Mixed-Use Development

Development that connects residential and commercial uses



HDG Architecture

Adaptive Reuse

Existing business improvements and infill vacant parcels



Wolfe Architectural Group

Inclusive Housing Choices

Add 4,000 housing units to the University District in next 20 years



Spokane Journal of Business

Next Generation University District Concept Plan 2065

Natural and
Economic Nodes



Pedestrian Friendly
Streets and Trails



A Livable,
Sustainable, and
Vibrant District



Zone-Specific University District Development Goals

In addition to the overall district goals, the U District wants to promote these development types within the GC and DTU zones:

General Commercial (GC)	Downtown University (DTU)
Maker Districts	Performance Venues
Food Markets	Cultural Centers
Food Production & Distribution	Art and Multicultural Gathering

Summary of Barriers to Urban Infill

Zoning Standards Need Targeted Improvements, But Major Overhaul Not Warranted

Zoning code standards have room for targeted improvements, but local and national market conditions, construction costs, and local politics are currently more of a barrier to substantial infill within the University District.

Aligning zoning with UD Plan and tackling targeted code improvements today will improve the chances of infill investment when macro-level market conditions improve.

PRIMARY HEADWINDS

Desirability & Safety of District
Challenging Market Conditions
High Construction Costs & Rates
Local Politics

ZONING BARRIERS

Overly Restrictive Zoning
Complex or Onerous Standards
Prescriptive Design Standards

Desired Development Types are Technically Permitted , but Complex and Prescriptive Standards Make Them Challenging

- Excessive Open Space Requirements
- Unclear Setbacks Standards
- Overly Prescriptive Design Standards
- Subjective and Unclear Design Standards



Barriers to Ground Floor Activation

- Lack of Ground Floor Activation Requirements in Desired Activation Areas
- Downtown Street Typologies are Not Aligned With the University District Vision



Barriers to Other Desired Development Types

- Drive Through Uses Allowed With Little to No Restrictions
- Lack of Weather Protection Requirements with Insufficient Clearance Standards
- Size Limits For Industrial Uses Within the GC Zone
- Industrial Uses Subject to Commercial Design Standards in the DTU Zone
- Insufficient Clarity on Childcare Uses Permitted



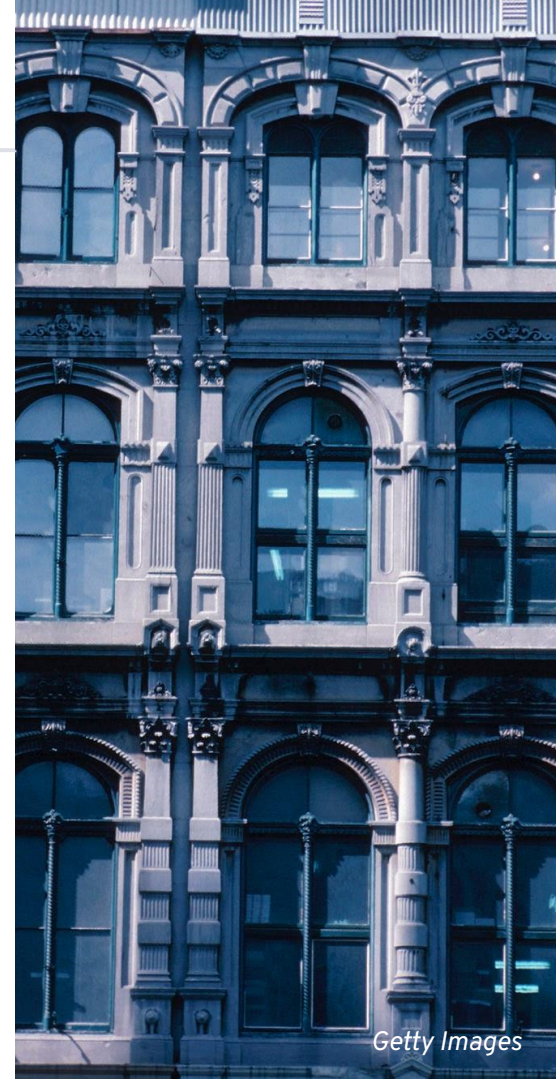
Barriers to Tall Building Development

- Floor Area Ratio Limits Too Low to Support Development
- Constraining and Complex Height Limits
- Subjective Design Standards Over 50 Feet
- Complex and Excessive Design Standards Over 70 Feet



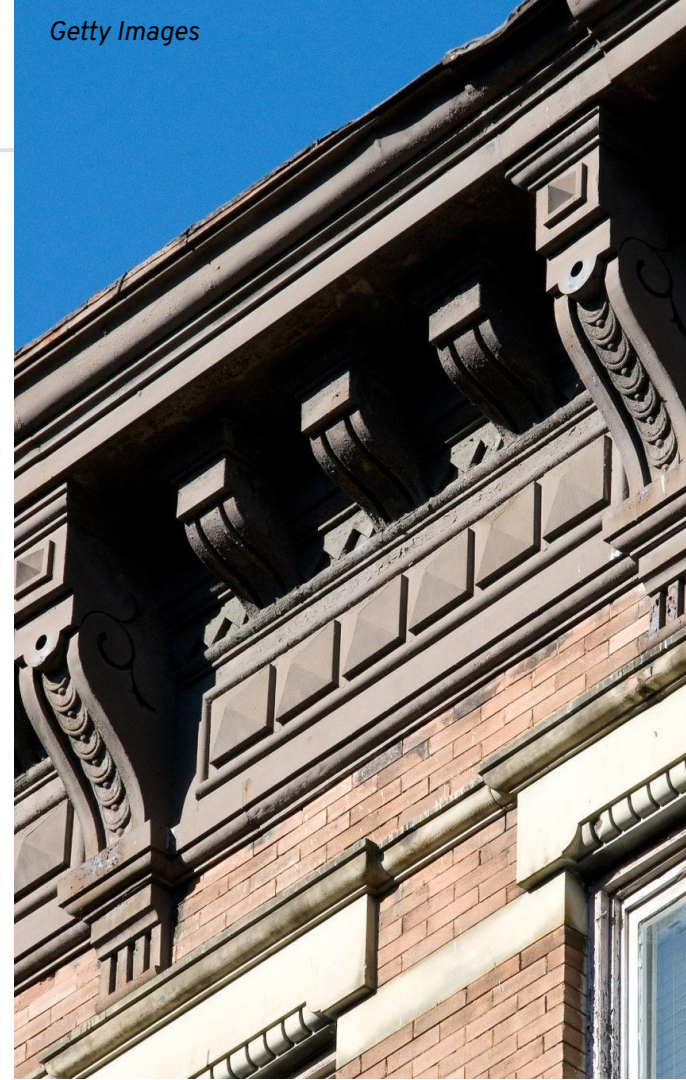
Barriers to Development Feasibility

- Design Review Requirements in the DTU zone
- Excessive and Overly Complex Transparency Standards
- Retail Frontage Requirement for Parking Garages in the DTU Zone
- Unclear and Prescriptive Setback Standards in the DTU Zone
- Requirement for Many Developments to Provide Landscape Plans
- Overly Prescriptive Requirement for Building Tops and Bases
- High Requirements for Insufficiently Defined Pedestrian Space



Unclear Standards

- Unclear and Subjective Design Requirement Metrics
- Subjective Standards for Breaking up Long Facades
- Unclear Measurements for Setback Required From the Curb
- Subjective Requirements for Drive Throughs to Minimize Pedestrian Conflict
- Unclear Definition Limited Industrial Uses in the DTU Zone

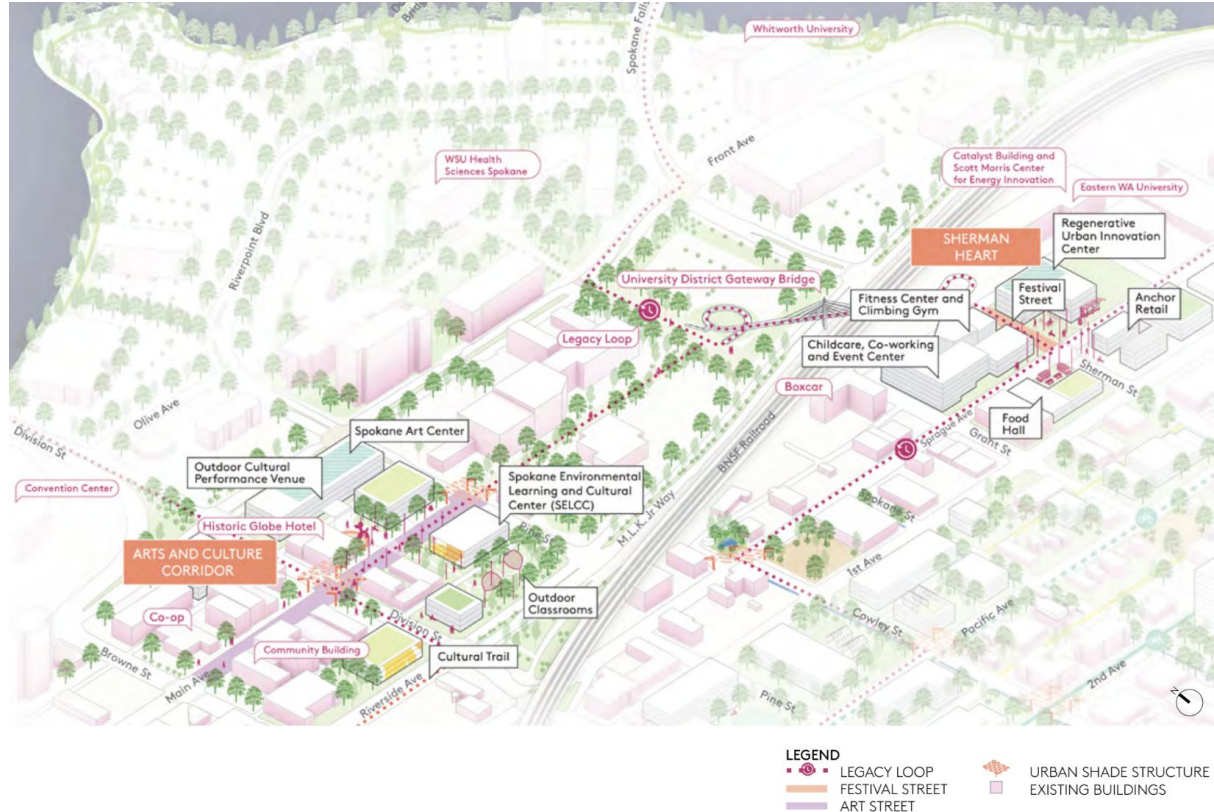


Recommendations

Support District Goals with Tailored Zones

Consider adopting a U District Comp Plan designation and more tailored Zoning Districts

Align the boundaries of zoning districts and the location where specific standards apply to the UD Plan, including Sub-district goals (i.e. Innovation Commons)



Support Ground Floor Activation in Specific Locations

- **Require Ground Floor Activation:** There are currently no requirements for mixed use or ground floor activation within the GC zone and there are only some requirements in the DTU zone. Consider bolstering these requirements at key locations identified within UD Plan.



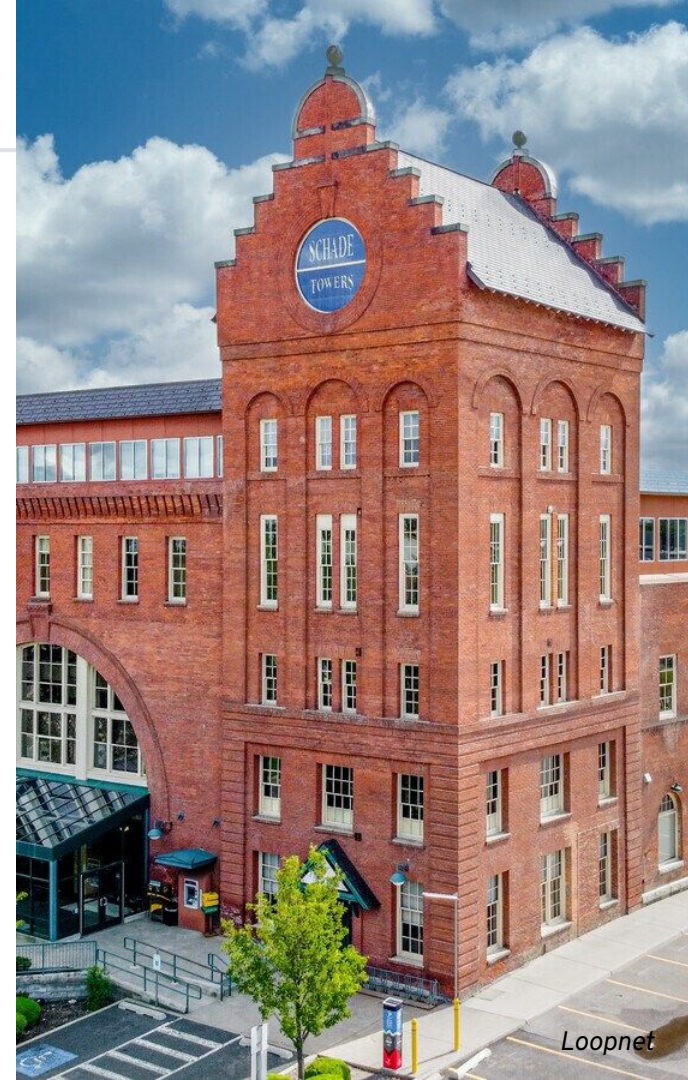
Support Residential Development

- **Reduce open space requirements:** Current requirements could reduce residential development feasibility.
- **Simplify and clarify design standards:** Simplify and clarify design standards for articulation and windows in particular.



Support Desired Development Types

- **Ensure Pedestrian Oriented Uses and Form:** Some street classifications do not align with the U District 2065 Next Gen Concept Plan, and standards for drive throughs and weather protection do not encourage pedestrian orientation.
- **Reduce Barriers for Light Industrial Development:** Consider increasing permitted square footage allowances for industrial zones and reduce DTU design review requirements.



Support Tall Building Development

- **Increase or remove FAR limits:** FAR limits the size of building that can be developed on a lot. The current FAR limits are overly restrictive, and because height limits can similarly regulate building size, it may be redundant to keep these FAR limits.
- **Relax Tall Building Design Standards:** Development over a 50 feet is subject to additional and onerous design standards that might prevent a project feasibility. Consider reducing these design standards.



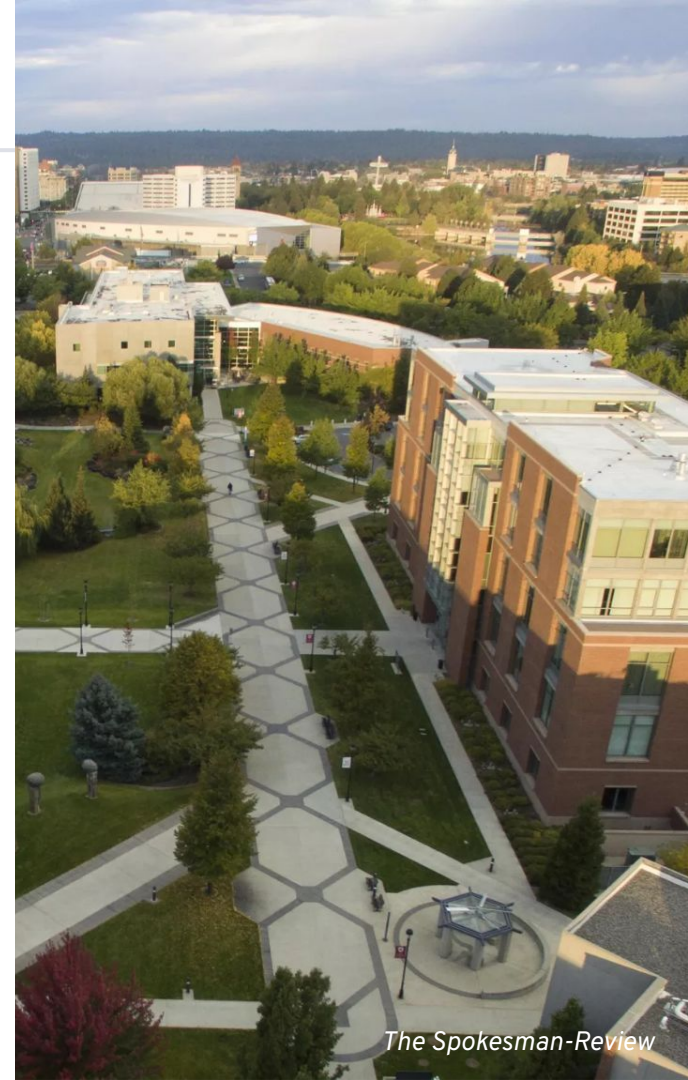
Support Development Feasibility

- **Adjust design review (DTU):** Reduce requirements for Design Review Board review.
- **Adjust design standards:**
 - Reduce transparency requirement and remove distance from street.
 - Allow more flexibility in how buildings meet the minimum setbacks.
 - Increase the lot size threshold that triggers the landscape plan requirement.
 - Reduce requirements for buildings to have distinct tops and bottoms.
 - Reduce and clarify plaza requirements.



Support Clarity and Processing

- **Adjust design requirement metrics:** Consider updating design standards throughout the code to remove the requirement, presumption, and consideration categories. Instead, opt for standards that clearly state requirements
- **Ensure specific and defined language:** Update sections throughout the code that use vague and subjective language.



Next Steps

Questions for City of Spokane:

- How can these findings help achieve the vision for the University District and inform the City's Comprehensive Plan update?
- What are next steps for the City's Comprehensive Plan update?
- Is there interest in creating tailored zones and standards within the University District?

Detailed Barriers Breakdown

GC

DTU



Apartments.com

Excessive Open Space Requirements

Residential development must provide a set amount of open space per unit. The open space can be common such as a yard or private such as a balcony. The space require ranges from **25 to 150 sf per unit** depending on lot size and bedroom count, and whether the space is common or private.

This is a steep requirement and may be difficult for some developments to meet.

GC

DTU



Apartments.com

Unclear Setbacks are Inconsistent With The Urban Context

Residential development must have a minimum setback of **10 feet** from a front lot line and **5 feet** from a streetside lot line, however, the GC and DTU zones has a **0 foot setback**.

There is not a clear distinction between a front lot line and a streetside line, nor which supersedes the other. Additionally it may be difficult to determine which setback applies.

GC

DTU



Apartments.com

Overly Prescriptive Design Standards

While design standards can promote desired building forms, functions, and aesthetics, they can significantly limit development. Residential development in the GC and DTU zones must meet the following overly prescriptive standards:

- **Tops and Bottoms:** Buildings must have distinct tops and bottoms.
- **Articulation:** Single detached and middle family housing facades longer than 40 feet and multi unit housing facades longer than 30 feet must be articulated through a provided variety of means.

GC

DTU



The Spokesman-Review

Subjective and Unclear Design Standards

The residential standard include subjective requirements that make it difficult for developers to interpret. These design standards are subjective:

- **Articulation:** Buildings shall be articulated into smaller units, reminiscent of residential scale.
- **Windows:** The code suggests but does not require windows to have visually prominent trim. The code encourages decorative window features.

GC

DTU



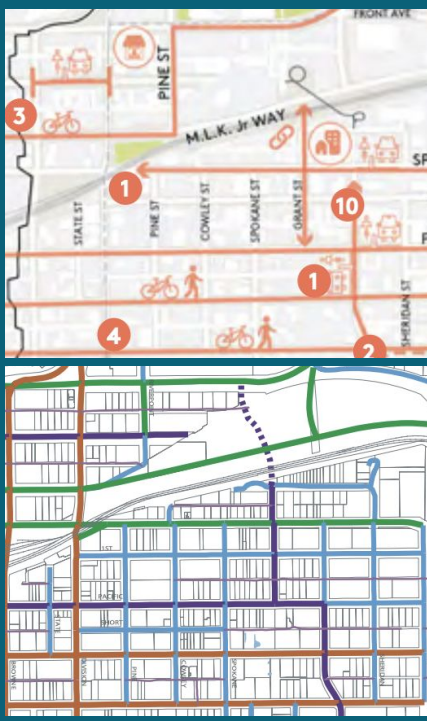
Cascadia Partners

Lack of Ground Floor Activation Requirements in Desired Activation Areas

The GC zone does not include any requirements for ground floor activation. The DTU zone has some limited standards to support ground floor activation for streets with Downtown Complete Street Designations however these street do not always align with the priority activation areas for the University District.

Updates to encourage ground floor activation and pedestrian oriented design in concentrated activation areas and limit standards outside of these areas where they may currently apply are recommended.

Spokane University District



Spokane Downtown Plan

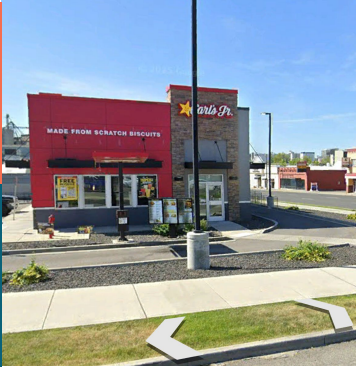
Downtown Street Typologies are Not Aligned With the U District Vision

Some U District streets are identified as Type I or Type II streets for Downtown District. These streets do not always overlap with priority main streets or identified Festival Streets and the Sherman Heart area identified in the U District 2065 Next Gen Concept Plan.

While Parking Garages along designated Type I/II streets must have linear retail, office, or civic uses at least 15 feet deep for 50% of street frontage that are not devoted to vehicular access areas; this standard does not encourage activated ground floors in priority areas to support larger district goals.

GC

DTU



Google Street View

Drive Through Uses Allowed With Little to No Restrictions

Drive throughs are **allowed** in the **GC zone** with **no pedestrian oriented design standards**. The **DTU zone** allows drive throughs, but **applies pedestrian oriented design standards** that prohibit vehicle lanes between the building and street along Type I or II complete streets.

Drive throughs are not pedestrian friendly uses, especially without specific design standards to improve pedestrian experiences.

GC

DTU



Kansas City Tent & Awning

Lack of Weather Protection Requirements with Insufficient Clearance Standards

Building awnings are allowed to project into the public realm, but are required to maintain **8 to 12 feet of clearance** above the sidewalk. There are no design standards requiring buildings to provide weather protection.

Awnings should have a minimum clearance of at least 10 feet, and this standard may be too low. Ideally, the code should also require a percentage of the street facing facade on priority main streets to provide weather protection for pedestrians.

GC



Greentown Labs, Houston

Size Limits For Industrial Uses Within the GC Zone

Individual industrial uses within the GC zone that exceed 50,000 square feet of floor area (excluding parking are a conditional use).

This could limit larger production, manufacturing, and/or makerspace uses from siting larger facilities within the District.

DTU



NextFab (makerspace)

Industrial Uses Subject to Commercial Design Standards in the DTU Zone

Industrial Uses in the DTU are subject to commercial design standards which could pose barriers to industrial developments and adaptive reuse projects. Further exploration of whether this poses a barrier to envisioned uses within the district is recommended.

DTU



Patriquin Architects

Insufficient Clarity on Childcare Uses Permitted

Daycare uses are permitted in both the DTU and GC zones. Daycare is not currently defined in the code therefore it is unclear if permitted uses are inclusive of both daycare centers and in-home daycare providers.

GC

DTU



Getty Images

Floor Area Ratio Limits Too Low to Support Development

For nonresidential development, the **GC zone has a maximum FAR of 2.5** and the **DTU zone has a maximum FAR of 6**. There is no maximum FAR for residential development. An ideal target FAR for the urban centers is closer to 8.

FAR limits in both the GC and DTU zone are too low to properly support and promote desired development types (multi-story civic, office, maker space).

GC

DTU



Getty Images

Constraining and Complex Height Limits

Both zones allow for approximately **12 stories** in height, which is an ideal target for urban districts. 2 to 8 story height bonuses may be awarded in the DTU zone. Additional design standards are triggered for developments above 50 feet and 70 feet. Development height within 150 feet of a R1 or R2 zone is limited to 2:1 ratio above 40 feet.

Design standards and regulations might complicate tall building development and height limits adjacent to residential zones may be too stringent.

GC

DTU



Getty Images

Subjective Design Standards Over 50 feet:

Roof forms must be visually distinctive, using features such as terraced step backs, pitched or curved roof elements, projecting cornice elements, trellises along parapets, geometric forms (dome, pyramid), and change of materials or color on the top floor.

The design requirements are not clear and objective, which may pose barriers to development.

GC

DTU



Getty Images

Complex and Excessive Design Standards Over 70 feet:

Stories above 70 feet must be **setback at least 20 feet** from all street lines, have a maximum **floor plate of 12,000 sq ft**, and a **maximum diagonal floor dimension of 150 feet**. Additionally, the building must have a **distinct top** and **blank facades must include design treatments** (mural, textured concrete, recesses, faux window or fenestration patterning, differing texture/color).

The upper floor form standards and limits are too restrictive and constrain the development of tall buildings. The design standards are not clear and objective.

DTU



Google Earth

Design Review Requirements in the DTU zone

Projects in the DTU zone that are **over 50,000 sf in size** or that **modify over 25% of the building facade** will be subject to review by a Design Review Board given the DTU zone within the University District is designated as having a “Perimeter” Review Threshold for the Design Review Board.

This adds cost and complexity to all DTU projects. Downtown Design Standards include 46 pages of Design Guidelines that are not clear and objective.

Triggers for Design Review Board for facade modifications could disincentive adaptive re-use projects in particular from more substantial upgrades.

GC



Getty Images

Excessive Transparency Standards

Buildings visible from and located within **20 feet of the lot line of an arterial street** must have a minimum ground floor transparency of **50%**. For buildings 20 to 60 feet of the lot line of an arterial street, this drops to **30%**.

The distance from the street line is excessive and redundant to the visible from requirement.

DTU



Getty Images

Excessive and Overly Complex Transparency Standards

Minimum ground floor transparency when visible from and located within 60 feet a complete type I, II, or IV street is **60%** for non residential uses and **20%** for residential uses. When 60 feet from a non complete street, the requirement is **30%**, and **50%** when 20 feet from a complete type III street.

In addition to the excessive distance standards, these transparency requirements are too high.

DTU



Getty Images

Retail Frontage Requirement for Parking Garages in DTU Zone

All Parking Garages along Type I/II streets must have linear retail, office, or civic uses at least **15 feet deep for 50% of street frontage** that are not devoted to vehicular access areas.

While this standards is supportive of walkable, pedestrian scaled development, it could significantly impact development feasibility particularly in locations where commercial uses may not be viable.

DTU



Getty Images

Unclear and Prescriptive Setback Standards in the DTU Zone

Both GC and DTU zones have a 0 foot minimum front setback and 12 foot minimum setback from curb (for a minimum 7 foot sidewalk). In the DTU zone, buildings facing a type I, II, or IV street without ground floor residential units **must meet the property line**. Exceptions along public plazas and for arcades where the 2nd floor meets the property line.

This standard may apply too widely and does not allow for flexibility where only certain portions of the facade meets the setback.

GC

DTU



Getty Images

Requirement for Many Developments to Provide Landscape Plans

Landscape plans are required for **all developments with more than 7,000sf** of lot area.

Landscape plans can add expense to projects as it might require additional landscape design services. Additionally, a 7,000 sf lot is a small lot to trigger this requirement and thus might discourage certain developments.

GC

DTU



Getty Images

Overly Prescriptive Requirement for Building Tops and Bases

Buildings must have a **distinct base** (using articulation and materials such as stone, masonry, or decorative concrete) and **distinct top** (with a distinct outline with elements such as a projecting parapet, cornice, or projection).

While this is a good design principal, it may be too prescriptive, subjective, and add prohibitive costs.

GC

DTU



Getty Images

High Requirements for Insufficiently Defined Pedestrian Space

A minimum of **1 SF of plaza, courtyard, or other pedestrian spaces** is required per **100 SF of building** for new buildings over 40,000 square feet.

This is a steep requirement to be so broadly applied. Additionally, it is unclear what is considered pedestrian space and if the space needs to be public or private.

GC

DTU



Spokane Journal of Business

Unclear and Subjective Design Requirement Metrics

Throughout the code, design standards are broken into the following categories:

- **Requirements**(R): objective standards, no discretion
- **Presumptions** (P): objective standards, flexibility (list or menu of options)
- **Considerations**(C): should be considered but are not required; only reviewed as part of design departure process

This leads to the code including standards with subjective applicability, making them unclear and potentially leading to confusion.

GC

DTU



The Urbanist

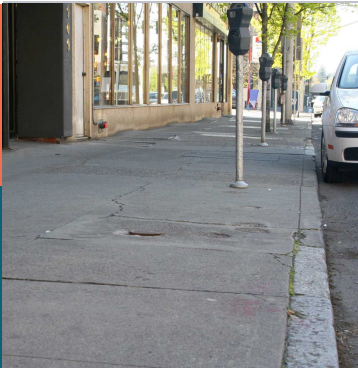
Subjective Standards for Breaking up Long Facades

Facades longer than fifty feet shall be **broken down into smaller units** through the use of offsets, recesses, staggered walls, stepped walls, pitched or stepped rooflines, overhangs and other elements of the building's mass. Simply changing materials or color is not sufficient to accomplish this.

This standard is not clear and objective.

GC

DTU



City of Spokane

Unclear Measurements for Setback Required From the Curb

Buildings must be at least 12 feet from the street curb and allow for at least a 7 foot walkway. Exception may apply, however, the setback shall not be reduced below 9 feet from the the curb **unless on-street parking exists between the building and the street.**

This standard is unclear.

DTU



The Spokesman Review

Subjective Requirements for Drive Throughs to Minimize Pedestrian Conflict in the DTU Zone

In the DTU zone, drive through facilities shall be designed to **minimize pedestrian conflicts** both on and off the site.

This standard is not clear and objective, and provides minimal guidance on specific measures that must be taken to mitigate adverse impacts on pedestrian experiences.

DTU



Getty Images

Unclear Definition Limited Industrial Uses in the DTU Zone

Industrial uses in the DTU for manufacturing, production, warehouse, freight movement, and wholesale are limited to on-site production or assembly of good by hand manufacturing using hand tools and small-equipment requiring all activity to be conducted within the structure.

Definition for limited industrial uses could be more clear and objective.