



December 31, 2012

Jim Kolva  
Jim Kolva Associates, LLC  
115 S. Adams Street  
Spokane, WA 99201

**RE: Comments on the Spokane Convention Center Expansion**

Dear Jim,

I am writing to provide comments on the Spokane Public Facilities District (PFD) Convention Center expansion project. As expressed in both meetings that I have attended, the expansion project will allow the PFD to improve the setting for conventions and many other events, as well as river and Centennial Trail access improvements within Riverfront Park. My comments focus on these latter aspects of the project and are based on our on-going commitment toward public safety, access, and our partnership/relationship with the City and others, especially as the City moves forward with the Riverfront Park Master Plan. As referenced from the Convention Center Completion study, goals of the project include: "Restor[ing] the Spokane River shoreline adjacent to the Convention Center; Creat[ing] a strong connection to the river and the Centennial Trail, and provid[ing] more riverside public space, informal meeting venues and a boat launch."

- **Centennial Trail Division Street Trailhead and Public Safety.** As we have discussed, Avista supports a location for the boat access site that would be either east of (our preference from a public safety perspective) or under the Division Street Bridge. Along with this support we feel compelled to emphasize the need for an active education program, including permanent signs and other public outreach efforts to inform the boating (canoeing, kayaking and rafting) public of the dangers associated with the access site's location, relative to the Division Street Bridge pilings, rock island, and most importantly Upper Falls Dam. Additional warnings need to be posted during spring and early summer high river flows. Avista is happy to work with the PFD during the development and/or placement of these materials in order to ensure their effectiveness.

As you are aware, the City currently has an ordinance restricting boats from being in the river downstream of the east side of the Division Street Bridge. The purpose of this ordinance is to help prevent boaters from being swept into unsafe waters downstream. The ordinance would need to be modified to accommodate an access site under the bridge. Please note though, that Avista does not support any type of boat access downstream of the bridge for public safety reasons.

- **Centennial Trail/River Access and Parking.** The public currently accesses the Division Street Trailhead at the north east corner of the parking lot where, we understand, four parking spots were designated to provide free parking and/or staging for cycling, running and other trail uses. These

parking spots, as well as all the others east of the former C.I. Shennanigan's, will be eliminated under the PFD's plans. The PFD should incorporate dedicated parking to accommodate vehicles with bicycles or boats on their tops within its facility, or provide an alternative in the immediate vicinity. Location is important when it comes to boat access, as boaters need to be able to get close to the access site so they can load or unload their boats and equipment.

- **Amenities for Use of Public Space.** The PFD has done a tremendous job conceptualizing its plans for the expansion project and has emphasized a desire to draw Riverfront Park users to this end of the Park. Park visitors will need restrooms and drinking water, neither of which currently exist in this section of the Park. In order for the Convention Center expansion project to accommodate Park visitors, as well as Convention Center users, the expansion project should consider incorporating (design and construct) public restrooms and drinking water facilities, both of which would be available from outside the Convention Center.
- **Other Services for Park Users.** During the first meeting that I attended, a number of people suggested creating space for concessionaires who could provide food service and/or rent boats and bicycles. Food service would help offset the loss of lunch and dinner opportunities that the public had before C.I. Shennanigan's was purchased for the expansion project, and the boat and bicycle rentals would enhance the public's Park and downtown experiences.
- **Designs Incorporating Pedestrians.** We support the PFD's stated goals for the project, including restoring the shoreline and creating a strong river connection. Currently, the Convention Center design does not provide for walking connections between the convention space and the waterfront area; early conceptual drawings of the completion appear to lack such pedestrian connections, and do not appear pedestrian friendly from the viewpoint of a trail user. We hope that more pedestrian-friendly designs can be incorporated into final plans, both for people inside the convention center and for park and trail users alike. Likewise, landscape elements along the buildings could greatly increase their approachability by pedestrians.

The City is currently developing the Riverfront Park Master Plan; as such, we encourage the PFD to integrate these improvements into the Master Plan from developmental and managerial perspectives. Thank you for considering our comments; we appreciate the opportunity to provide them. Please feel free to call me at (509) 495-4998 if you have any questions or wish to discuss them.

Sincerely,

  
Elvin "Speed" Fitzhugh

Spokane River License Manager



December 31, 2012

Kevin Twohig  
Executive Director  
Spokane Public Facilities District  
720 W. Mallon Ave.  
Spokane, WA 99201

Dear Kevin:

**Subject: Futurewise and The Lands Council comments on Shoreline development plans for the Spokane Convention Center expansion at the Convention Center Trail Head on the Spokane River and Centennial Trail.**

Sent via email to Kevin Twohig (at [ktwohig@spokanepfd.org](mailto:ktwohig@spokanepfd.org)) and online submission form (at <http://www.spokanepfd.org/completion/feedback.php>)

Thank you for your outreach and the opportunity to comment on the issue of public access and shoreline development.

The Lands Council is regional membership organization whose mission is to preserve and revitalize Inland Northwest forests, water, and wildlife through advocacy, education, effective action, and community engagement with several hundred members in Spokane county. Our mission at Futurewise is to promote healthy communities and cities while protecting working farms, working forests, and shorelines for this and future generations. Futurewise has members across Washington State, including many in Spokane County. We appreciate that the Public Facilities District (PFD) has already made improvements to the design such as removing docks and overhands from that plan that would violate the City of Spokane Shoreline Master plan. Our comments on the current plans follow.

**The City of Spokane Shoreline Master Plan Intensive Urban Environment:**

The Convention Center Expansion Project is in a designated Intensive Urban Environment under in the City of Spokane Shoreline Master Plan. The Purpose of this designation is to...

*"...ensure optimum, intensive public utilization of shorelines by providing high-intensity public use and managing development so that it enhances and maintains the shorelines for a variety of urban uses. Existing ecological functions within the shoreline area must be protected, and areas that have been previously degraded must be restored. Urban use of shorelines in this environment should be limited to water-oriented uses in developed areas with adequate building setbacks from the top of the riverbanks. Priority will be given to public access, both visual and physical. Pedestrian paths and cycle paths should connect to access points. Public*

*ownership of land should be maintained and expanded along the riverbanks.” City of Spokane Comprehensive Plan Shoreline Chapter P. 19*  
Intensive Urban Environment Management Policy 1 states.

*“Non-water oriented uses should not be allowed except as part of mixed use (water dependent, water related and/or water-enjoyment) developments”*

*“Non-water oriented uses may also be allowed in limited situations where they do not conflict with or limit opportunities for water-oriented uses or on sites where there is no direct access to the shoreline. Such specific situations should be identified in a shoreline use analysis or special area planning.” City of Spokane Comprehensive Plan Shoreline Chapter P. 19*

And Policy 5 requires.

*“Assure no net loss of shoreline ecological functions as a result of new development, and where applicable, require that new development include environmental cleanup and restoration of the shoreline to comply with state and federal law” City of Spokane Comprehensive Plan Shoreline Chapter P. 19*

The no net loss mandate is further codified in the Spokane Municipal Code (SMC) Section 17E .060.210 and in the Washington Administrative Code (WAC) 173-26-186(8). These policies are the legal and policy basis for our comments below.

**We strongly support the decision to eliminate the dock from the expansion landscape plan.**

The addition of a dock or overhang to the Convention Center Project would add unnecessary environmental impacts to an already disturbed portion of the river and neither add aesthetic value to an already cluttered area of the river, nor enhance public access as pedestrians can easily gain visual access to the river from the building and the paths and the dock would not be suitable for launching boats.

**We support adding native vegetation and preserving trees in the expansion landscape plan.**

Adding native vegetation complies with the Shoreline Management Act’s “no net loss of ecological function” mandate and reflects well on the community. Native vegetation helps protect water quality by preventing erosion and absorbing storm water. We look forward to learning more details in the project’s required vegetation replacement plan. Visitors to Spokane appreciate the local flair provided by such details. We urge the PFD to go farther to protect water quality by using low impact development techniques in the landscaping plan and use permeable surfaces for pathways and outdoor plazas. This will also reflect well on the community while protecting the Spokane River from stormwater runoff. We look forward to more details in the projects further site assessment and design.

The Spokane Municipal Code Section 17E.060.230 states:

*“A. Purpose:*

*To achieve no net loss of shoreline ecological functions by protecting and restoring the ecological functions and ecosystem-wide processes performed by vegetation along shorelines. Vegetation conservation also increases the stability of riverbanks, reduces the need for shoreline stabilization measures and improves the visual and aesthetic qualities of the shoreline, protects plant and animal species and their habitats, and enhances shoreline uses.*

*B. There shall be no net loss of vegetative cover within the shoreline jurisdiction.”*

And section 17E.060.200 Water Quality and Stormwater states:

*“A. Stormwater management facilities shall be developed in such a manner that there is no net loss of shoreline ecological functions or a significant impact to aesthetic qualities or recreational opportunities.*

*B. Low impact development (LID) techniques, as defined in chapter 17A.020 SMC, shall be considered and implemented to the greatest extent practicable throughout the various stages of development, including site assessment, planning and design, vegetation conservation, site preparation, retrofitting, and management techniques.”*

**Retaining the Centennial Trail and creating an additional on-site path is not enough to preserve public access to the Convention Center Trail head and Spokane River.**

While current conceptual design has many attractive features, Futurewise concurs with the Spokane River Water Trail Access Coalition in their finding that without change, the current design will result in a net loss rather than net gain for public access to this high traffic shoreline area.

The primary challenge is overcoming elimination of the trailhead access currently gained via parking (east) of CI Shenanigans. This is a popular place to initiate Centennial Trail walking and cycling activities. Loss of this access is a loss of a Centennial Trail trailhead as well as river access at Division Street Bridge for kayakers and canoers. If the current trailhead and parking is removed, parking, loading/unloading and/or access to the Centennial Trail and Spokane River for paddlers and cyclists is lost with it.

Since this development is arguable a none water-dependent/water-oriented use, and therefore should be truly mixed use, the following features (some of which were previously offered to the public by the project proponents) should be accounted for in the site plan.

- Providing public restrooms;

- Providing a public drinking fountain;
- Providing space for vendors to offer food and recreational opportunities consistent with a mixed use classification, supporting local needs and offering local flavor to those using the convention center;
- Maintaining the trail through all seasons.

Spokane Municipal Code § 17E.060.820 states:

*“Along the river, new buildings shall provide at least three of the following (R):*

- a. Outdoor seating or opportunities for outdoor dining.*
- b. Building entry from the river side.*
- c. Benches along pedestrian trail.*
- d. Outdoor balconies.*
- e. Public plaza with seating.*
- f. Public viewpoint with interpretive signs (see SMC 17E.060.810(A)(2)(a)(iii), Overlooks and Public Development, and SMC 17E.060.810(A)(2)(b), Overlooks in Private Development).*
- g. Public art.*
- h. Opportunities for outdoor vending such as food or bicycle rental.”*

**Futurewise, The Lands Council and the Spokane River Access Coalition would like to work with the Public Facilities District to create a design that works for everyone.**

The Coalition would like to work with together with the community to address these challenges in a way that results in a project that better serves visitors and the community. The result would be development of the “Spokane Convention Center Trailhead and River Access.”

A number of design options could address the challenges noted. For instance, the PFD could provide a loading/unloading area as well as garage space with egress to the trail for walking, paddling and cycling activities. Alternatively, a partnership with the Marriott across Division could be created to utilize parking on the west side of their building to support water trail and cycling access.

Public Facilities District

December 31, 2012

Page 5

Our intent with this letter is not to recommend a specific “fix.” Instead it is to 1) clearly note design improvements that are in the interest of the public and grounded in regulatory compliance, and 2) offer to work with the PFD to meet these challenges.

Thank you for considering our comments. If you require additional information please contact me at telephone (509) 838-1965 or e-mail [Kitty@futurewise.org](mailto:Kitty@futurewise.org)

Sincerely,

Kitty Klitzke  
**Spokane Program Director, Futurewise**

Mike Petersen  
**Executive Director, The Lands Council**



December 31, 2012

Kevin Twohig  
Executive Director  
Spokane Public Facilities District  
720 W. Mallon Ave.  
Spokane, Washington 99201

**SENT VIA EMAIL ([kjt@spokanearena.com](mailto:kjt@spokanearena.com))**

**RE: Comments on Shoreline Development Issues**

Dear Mr. Twohig:

These comments are submitted on behalf of the Center for Justice on the development of the shoreline plans for the Spokane Convention Center expansion. The Center for Justice is a local not-for-profit legal advocacy organization, which houses the Spokane Riverkeeper program. The Center participated in the recent stakeholders' group designed to discuss shoreline improvements associated with the expansion of the Convention Center.

We appreciate the opportunity to provide comments on issues that should be addressed in the shoreline permitting process for the proposal and have identified the following issues that should be addressed as part of the final proposal to protect and enhance the shoreline areas of the Spokane River:

### **1. Opportunities for Public Use and Access**

The Center strongly supports the proposal advanced in the stakeholder process to create and enhance public access as part of the Convention Center expansion. This includes providing restroom facilities, providing a non-motorized boat launch, and bike access to the Centennial Trail, creating opportunities for vending, and public parking within a reasonable distance from the boat launch. These measures were discussed as part of the stakeholder process and were committed to by Convention Center expansion proponents during the recent election.

Moreover, these measures are consistent with Spokane's Comprehensive Plan that states:

Non-water oriented uses may also be allowed in limited situations where they do not conflict with or limit opportunities for water-oriented uses or on sites where there is no direct access to the shoreline. Such specific situations should be identified in a shoreline use analysis or special area planning.

Here, a non-water oriented use, such as the Convention Center, cannot limit the existing recreational uses of the river. There currently is suitable parking for vehicles carrying canoes, kayaks, or bicycles. Maintaining this parking and reasonable walking distance to the Centennial Trailhead and a river access point is critical and required by the Comprehensive Plan.

Moreover, the City's Shoreline Master Program (SMP) requires that the expansion include other public amenities. Spokane Municipal Code § 17E.060.820 provides that shoreline developments in the downtown district must include buildings and additions that promote visual and physical access to the water, such as shoreline benches, shoreline public faces, or public seating and vending opportunities facing the shore. Specifically, this section states:

Along the river, new buildings shall provide at least three of the following (R):

- a. Outdoor seating or opportunities for outdoor dining.
- b. Building entry from the river side.
- c. Benches along pedestrian trail.
- d. Outdoor balconies.
- e. Public plaza with seating.
- f. Public viewpoint with interpretive signs (see SMC 17E.060.810(A)(2)(a)(iii), Overlooks and Public Development, and SMC 17E.060.810(A)(2)(b), Overlooks in Private Development).
- g. Public art.
- h. Opportunities for outdoor vending such as food or bicycle rental.

Protecting and enhancing existing access by providing restroom facilities, providing a non-motorized boat launch, and bike access to the Centennial Train, creating opportunities for vending, and public parking within a reasonable distance from the boat launch is consistent with the SMP and the Comprehensive Plan, as well as the commitments made to the voters and the stakeholder group.

## **2. Low Impact Development**

The Center strongly supports the use of Low Impact Development (LID) techniques in all aspects of the expansion project.

LID is an innovative stormwater management approach with a basic principle that is modeled after nature: manage rainfall at the source using uniformly distributed decentralized micro-scale controls. LID's goal is to mimic a site's predevelopment hydrology by using design techniques that infiltrate, filter, store, evaporate, and detain runoff close to its source. Techniques are based

on the premise that stormwater management should not be seen as stormwater disposal. Instead of conveying and managing / treating stormwater in large, costly end-of-pipe facilities located at the bottom of drainage areas, LID addresses stormwater through small, cost-effective landscape features located at the lot level. These landscape features, known as Integrated Management Practices (IMPs), are the building blocks of LID. Almost all components of the urban environment have the potential to serve as an IMP. This includes not only open space, but also rooftops, streetscapes, parking lots, sidewalks, and medians. LID is a versatile approach that can be applied equally well to new development, urban retrofits, and redevelopment / revitalization projects. LID use is particularly important in the Spokane River watershed because stormwater is one of the most significant sources of pollution.

The SMP requires several LID measures. First, all open spaces, courtyards, plazas, and other public spaces must “allow for the capture of rainwater and filtration into a natural cleansing system of vegetation and sub-grade materials.” SMP § 17E.060.820. Other surfaces must “include at least ten percent pervious surfaces.” *Id.* The SMP indicates that this could include at-grade planted areas, permeable paving, green roofs, and protection of existing trees. *Id.* All these measures have been used successfully in other projects.

The Center also requests that pervious pavement options be used for any sidewalk or trail construction. Studies support the utilization of permeable materials that minimize water quality associated impacts of trail development. Permeable pavements have proven to be practical, cost-effective, and watershed-friendly due to their ability to reduce stormwater runoff. Because these permeable materials allow water to pass through the surface (in the case of porous asphalt and concrete) or through void spaces (in the case of concrete pavers or grid pavers), both runoff volume and water quality impacts are reduced. This infiltration of runoff can reduce nuisance flooding, recharge groundwater supplies, filter out pollutants, and help keep drinking water healthy.

Information indicates that this material is cost-effective and long lasting. According to EPA<sup>1</sup>, these materials are well suited to northern climates such as Spokane, resulting in increased lifespan for paved areas:

Due to the well-draining stone bed and deep structural support of porous asphalt pavements, they tend to develop fewer cracks and potholes than conventional asphalt pavement. When cracking and potholes do occur, a conventional patching mix can be used. Freeze/thaw cycling is a major cause of pavement breakdown, especially for parking lots in northern climates. The lifespan of a northern parking lot is typically 15 years for conventional pavements; porous asphalt parking lots can have a lifespan of more than 30 years because of the reduced freeze/thaw stress (Gunderson, 2008). ... Porous asphalt has been found to work well in cold climates as the rapid drainage of the surface reduces the occurrence of freezing puddles and black ice. Melting snow and ice infiltrates directly into the pavement facilitating faster melting (Gunderson, 2008).

---

<sup>1</sup> See <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm?action=browse&Rbutton=detail&bmp=135&minmeasure=5>.

Cold weather and frost penetration do not negatively impact surface infiltration rates. Porous asphalt freezes as a porous medium rather than a solid block because permeable pavement systems are designed to be well-drained; infiltration capacity is preserved because of the open void spaces (Gunderson, 2008).

Another study conducted by the University of Rhode Island found that these materials are cost effective, stating:

On a yard-by-yard basis, the cost of porous asphalt is about the same as the cost of conventional asphalt (i.e., \$0.50-\$1.00/ft<sup>2</sup>).

The underlying stone bed is usually more expensive than a conventional compacted subbase, but is offset by the reduction in storm-water pipes and inlets, and elimination of detention basins. Generally, porous pavement installation does not require deep excavations, and there is less earth-work than for conventional asphalt.

Moreover, these types of materials are readily available, including available locally at Central Premix (*see* <http://www.centralpremix.com/sand276>).

### **3. Ground Floor Enhancements**

In order to enhance the character of the shoreline area, the SMP requests ground floor amenities that the Center strongly supports. The SMP § 17E.060.820 states:

The ground floor of buildings shall incorporate a combination of at least three of the following features (R):

- i. Windows covering more than thirty percent of the ground level façade facing the shoreline.
- ii. Windows covering more than thirty percent of the ground level façade facing the street.
- iii. Masonry or stone covering the ground level façade and producing a “plinth” effect.
- iv. Ground level details such as accent lighting, decorative medallions, and canopies.
- v. Sculpture, bas relief murals, art worked into paved surfaces.
- vi. Retail uses, such as cafes and restaurants, bike rental, and brew pubs.
- vii. Publicly accessible gardens, courtyards, or plazas.

#### **4. Stormwater Permitting Requirements**

While not directly related to the shoreline permitting requirement, it is critical that the expansion project comply with the City of Spokane's stormwater permitting requirements and by obtaining a Construction Stormwater NPDES permit from the Department of Ecology. Measures must be implemented during and after construction to avoid the discharge of any stormwater directly into the Spokane River or into the City's stormwater/CSO system.

We appreciate the opportunity to comment on this matter and request a copy of any permit applications that you submit associated with this proposal.

Sincerely,

CENTER FOR JUSTICE

A handwritten signature in black ink, appearing to read 'REI', with a long horizontal flourish extending to the right.

Rick Eichstaedt  
Executive Director

# SCKC

SPOKANE CANOE & KAYAK CLUB



Date: December 31, 2012

Re: Public Comment: Convention Center Expansion

Dear Spokane Public Facilities District

Please consider this letter as part of the public comment process for the Convention Center Project.

In April 2012, the public voted in favor to support the spending of \$65 million for the expansion of the Convention Center, which will include improvements to the Centennial Trail shoreline. Spokane Canoe and Kayak Club members would like to take this opportunity to reiterate the promises made during the campaign to garner support for the Spokane Convention Center expansion project. Some of those promises that we supported included that there would be an improvement to the Convention Center Trailhead/River Access. Currently there is suitable parking for vehicles carrying canoes, kayaks or bicycles. Maintaining parking and reasonable walking distance to the Centennial Trailhead and water trail access point is critical

Since the expansion construction is being carried out through public funds, certainly an allocation for public restrooms at the trailhead would alleviate the need for trail users, vendors, and others, to use the Convention Center facilities.

It was mentioned in a recent meeting that perhaps the Parks and Recreation Department would be responsible for maintenance of the trailhead. Another consideration that must be acknowledged would be the anticipation that the height of the Convention Center to the south of the trailhead will probably result in the occasional need for ice and snow removal on the trail. The current exposure of the sun results in a quick melting period of snow and ice, not possible under the current plans for expansion. This is a safety issue, which affects river use, including the carrying of boats and gear to the river, as well as runners and bicyclists using the trail. An increasing number of locals practice these activities throughout the seasons.

We will continue to work with our coalition partners, to ensure that all stakeholders have a voice during this consultation process, so that the needs of the general public continue to be met and enhanced by this expansion.

Sincerely,

Celene Olgeirsson President  
Brian Durham, Access Chairman

Spokane Canoe and Kayak Club  
PO Box 819  
Spokane, WA 99210  
[www.sckc.ws](http://www.sckc.ws)



December 31, 2012

Kevin Twohig  
Executive Director  
Spokane Public Facilities District  
720 W. Mallon Ave.  
Spokane, WA 99201

Dear Kevin,

Thank you for the opportunity to comment on development of the shoreline plans for the Spokane Convention Center expansion. The Spokane River Forum agrees that the Convention Center expansion provides important community economic development benefits and, properly designed, further define our community's "Near Nature, Near Perfect" destination attraction signature.

The current conceptual design has many attractive features. Without revision, however, there will be a net loss rather than net gain for public access to this high traffic shoreline area. To assist the Public Facilities District (PFD) in creating a net-gain situation, we are working with others to form the Spokane River Water Trail Access Coalition.

The Coalition consists of recreational user groups and others interested in making the safe, enjoyable use of the river and centennial trail system as accessible as possible. The coalition has expertise in development of other Spokane River access points, and broad experience with well-designed access points across the Northwest. We see this as an opportunity for everyone involved. The comments below summarize the concerns that we believe should be addressed.

As you know, there are a number of Shoreline Management Act and local planning regulations that apply. The Convention Center expansion is in an area designated as an "intensive urban environment." The Spokane Comprehensive Plan describes the purpose of an intensive urban environment as follows: "To ensure optimum, intensive public utilization of shorelines by providing high-intensity public use and managing development so that it enhances and maintains the shorelines for a variety of urban uses. ... Urban use of shorelines in this environment should be limited to water-oriented uses in developed areas with adequate building setback from the top of the riverbanks. Priority will be given to public access, both visual and physical. Pedestrian paths and cycle paths should connect access points ...".

According to the comprehensive plan, priority uses are:

- "First priority should be given to water-dependent uses"
- "Second priority should be given to water-related and water-enjoyment uses"

- “Non-water oriented uses should not be allowed except as part of mixed use (waterdependent, water-related, and/or water-enjoyment) developments.

With this in mind, the most immediate challenge is overcoming elimination of the trailhead access currently existent via parking adjacent (east) of CI Shenanigans. This is a popular place to initiate Centennial Trail walking and cycling activities. Loss of the trailhead is exacerbated by the design showing a critically needed improvement, namely river access at Division Street Bridge. With the current trailhead removed, the question becomes “where’s the parking, loading/unloading zone and/or access to the Centennial Trail or Spokane River for paddlers and cyclists?”

Additional concerns include:

- Providing public restrooms;
- Providing a public drinking fountain;
- Providing space for vendors to offer food and recreational opportunities consistent with supporting local needs and offering local flavor to those using the convention center;
- Maintaining the trail through all seasons.

The Coalition would like to work with your design/build firm to address these challenges in a way that shoreline development results in a net gain rather than net loss for the community. The result would be development of the “Spokane Convention Center Trailhead and River Access.”

The Forum believes any number of design options can address the challenges noted. For instance, the PFD could provide a loading/unloading area as well as garage space with egress to the trail for walking, paddling and cycling activities. Alternatively, a partnership with the Marriott across Division could be created to utilize parking on the west side of their building to support water trail and cycling access.

Our intent with this letter is not to recommend a specific “fix.” Instead it is to 1) clearly note design improvements that are in the interest of the public and grounded in regulatory compliance, and 2) offer to work with the PFD to meet these challenges.

Again, the Convention Center expansion is a wonderful opportunity for our community. We look forward to working with you to make it successful from a shoreline, water trail and public access perspective.

Sincerely,



Andrew Dunau

Executive Director



P.O. Box 7458 • Spokane, WA 99207 • [www.northwestwhitewater.org](http://www.northwestwhitewater.org)

December 31, 2012

Kevin Twohig  
Executive Director  
Spokane Public Facilities District  
720 W. Mallon Ave.  
Spokane, WA 99201

Dear Mr. Twohig:

The Northwest Whitewater Association (NWA) appreciates the opportunity to comment on development of the Spokane Convention Center expansion. NWA has a strong commitment to making the Spokane River accessible, safe and enjoyable for all. In this regard, we've been pleased to work with the Spokane Canoe and Kayak Club, the Spokane River Forum and others to develop a Spokane River Water Trail. This includes being instrumental in annual clean-up activities and restoration projects.

NWA believes the current design can be improved to assure community access to the river and Centennial Trail. To do this, a trailhead feature needs to be established. This would include the ability to load and unload equipment, parking and easy walking distance to access to the river and/or Centennial Trail. In addition, public facilities such as restrooms, drinking water, a recreation concession and refreshments are critical.

We look forward to working with you and groups such as the Spokane River Forum to assure convention center expansion builds on our common desire to preserve and enhance the Spokane River and Centennial Trail system as one of our community's greatest assets. Collectively, these efforts will assure this area is preserved and valued by local residents. Such an outcome clearly aligns with the public vote to support convention center expansion.

We expect the reaction of someone enjoying a convention to be "Wow !! This is cool. Let's get out there and enjoy it with the rest of Spokane."

Sincerely,

Paul Delaney  
President/Northwest Whitewater Assoc.