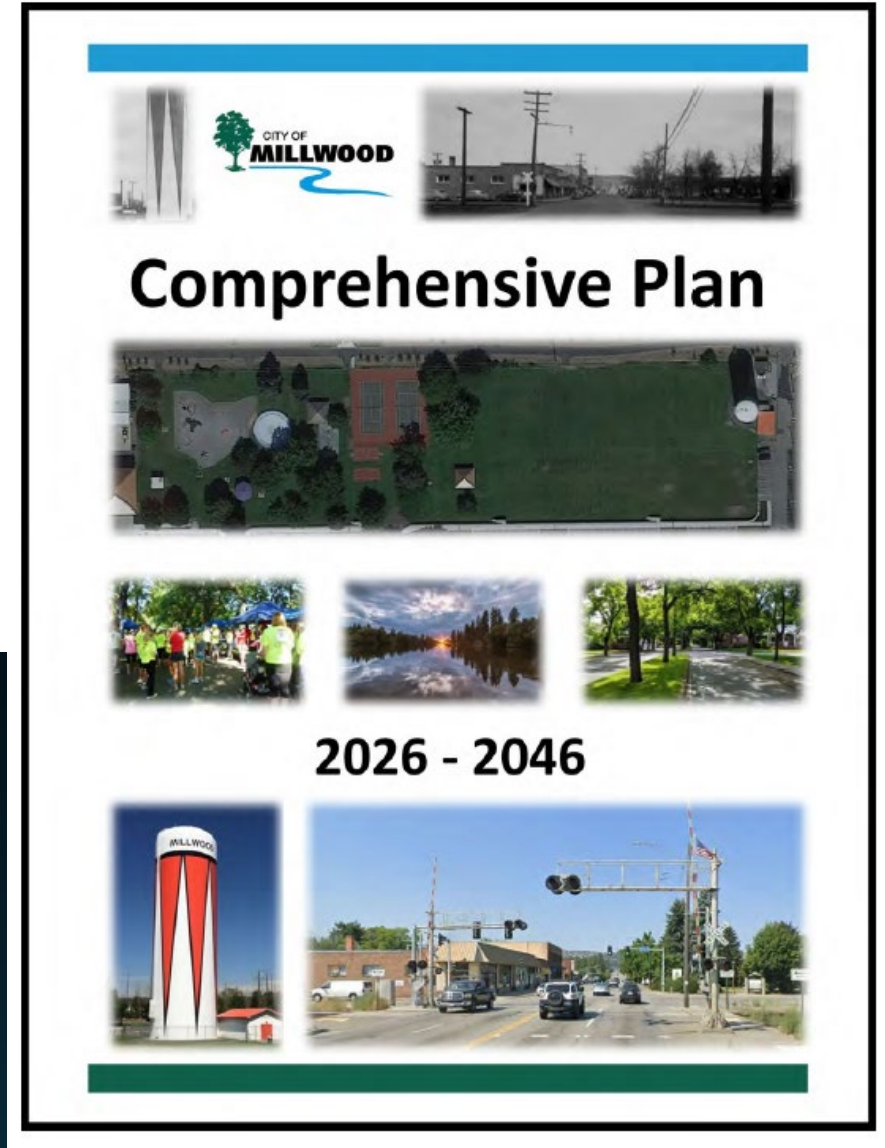


# 2026 Comprehensive Plan Periodic Update

## 60 Day Review Comments - Proposed Comprehensive Plan Modifications

October 30, 2025



# WA State Dept. of Fish & Wildlife

## 1. 8/28/25 Draft - P. 10, correct 3<sup>rd</sup> paragraph typo on RCW reference to 36...

To guide the development of comprehensive plans and land use regulations for those municipalities and counties to which the GMA applies. The GMA establishes the following goals (RCW ~~23~~6.70A.030, updated in 2021 and 2023):

## 2. 8/28/25 Draft - P. 21, Goal G.09 clarification

G.09. Preservation and stewardship of our natural environment and resources, including but not limited to: water quality, clean air, native species protection, geological landforms, and habitat connectivity.

## 3. 8/28/25 Draft - P. 24, Policy P.15 correction (remove Implementing Action #2 reference)

P.15 “Preserve Millwood’s tree city designation.” - *Remove Implementing Action #2 (n/a parking study)*

## 4. 8/28/25 Draft - P. 29, Implementing Actions #2 correction (remove reference to P.15 Tree City)

#2. “Initiate a Parking Study along Argonne Road to better understand how parking is being utilized in the Central Business District and where opportunities exist.” - *Remove Policy #15 (n/a Tree City)*

## 5. 8/28/25 Draft - P. 25, Policy P.23 correction

P.23: Conserve fish and wildlife habitat areas to ~~preserve~~ ensure no net loss of ecological functions and values, maintain public safety, and prevent the degradation of natural resources.

# WA State Dept. of Fish & Wildlife

6. **8/28/25 Draft - P. 29, Implementing Actions #1 clarification (for reference to P.15 Tree City & P.20 stormwater)**  
#1. Develop a Central Business District Plan for development along Argonne Road **which includes parking locations with wayfinding signage, ~~and~~ inclusion of public art, utilizing green infrastructure / low impact development, and street trees consistent with Millwood’s Tree City designation.**
7. **8/28/25 Draft - P. 29, Implementing Actions #3 clarification (for reference to P.17 natural features... )**  
#3. **Develop and** adopt design standards for commercial development.
8. **8/28/25 Draft - P. 30, Implementing Actions #13 clarification (for reference to P.08 “mini-parks”, P.15 Tree City, & P.23 habitat) & additional language**  
#13. Establish a park plan for the City of Millwood **and supplemental implementation such as habitat and microhabitat inclusion in park and median improvements, increasing tree canopy cover and utilization of native drought- and pest-resistant trees, shrubs, and grasses in restoration efforts to support climate resilience, removing derelict or obsolete fencing and utilizing wildlife-friendly fencing design when constructing new fences or modifying existing fences, utilizing permeable pathways where possible, considering open space dedications for larger new development projects, etc.**

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## 9. 8/28/25 Draft - P. 30, Implementing Actions #14 spelling correction

#14. Evaluate the ~~cities~~ city's dry well system...

## 10. 8/28/25 Draft - P. 31, Implementing Actions #22 correction

#22. Implement the ~~goals and policies~~ regulations, standards, and code of the Critical Areas Ordinance (CAO) and the Shoreline Master Program (SMP), with updates as needed for consistency with revised Comprehensive Plan goals, policies, and implementation actions.

## 11. 8/28/25 Draft - P. 55, Section 5.2 – Existing Land Use Context - Table 5-1 Zoning Categories addition

Manufacturing/Industrial - I-2: The Manufacturing / Industrial designation, also known as the Paper Mill Alternative zone for the historic Inland Empire Paper Mill, allows up to four stories, and is intended to preserve the existing use of the property without negatively affecting the aesthetics of the Argonne Road corridor and the Millwood Historic District, nor the quality of life for surrounding residences and businesses. If the site is abandoned, future uses would be mixed use commercial / residential and light industrial. Alternatively, the City could explore utilizing the Public Reserve (P-1) zoning designation in this area to establish a public park and fish and wildlife habitat area buffer along the river. Restoring this area to its original, natural condition over time would increase pollution and nutrient filtration, decrease erosion potential into the Spokane River, allow for habitat and bike transit connectivity while enhancing the aesthetic of Millwood, and fulfilling several of the city's policies and action items.

# WA State Dept. of Fish & Wildlife

## 12. 8/28/25 Draft - P.69, Section 5.6 - Critical Areas - Fish and Wildlife Habitat Conservation Areas

Fish and wildlife habitat areas should be conserved for the management and maintenance of fish and wildlife resources. Habitats can be broadly defined as areas containing water, food, and shelter required for the survival of ~~animals, birds or fish~~ and wildlife. The City recognizes the role that these areas play in the local ecosystem and supports their conservation for public health, safety, and well-being, as well as for the aesthetic value they bring the community. The City implements the most updated version of their Critical Area Ordinance (CAO) and best available science when managing fish and wildlife habitat conservation areas.

There are sections of land within the City and surrounding areas that perform valuable functions as fish and wildlife habitat. Some of the land along the river's shore still has native vegetation or has adequate vegetation to provide a habitat for ~~animals and birds~~ wildlife as well as shade for the trout, walleye, and other fish that frequent the river. ~~In the Critical Areas Ordinance (CAO) the city identifies the first 50 feet inland of the Ordinary High Water Mark (OHWM) of the Spokane River as a Critical Fish and Wildlife Habitat area buffer. This same area is identified by the Shoreline Master Plan, for all environmental designations, as the Minimum Native Conservation Area.~~ The City's Shoreline Master Program (SMP) designates a Minimum Native Conservation Area where native vegetation shall be planted and maintained to ensure no net loss.

# WA State Dept. of Fish & Wildlife

## 13. 8/28/25 Draft - P.71, Section 5.7 - Critical Areas - Open Space Corridors

The north bank of the Spokane River shares the same urban conservancy characteristics as the south side, but it also serves as an open space corridor. The Centennial Trail runs east to west along the north side of the Spokane River on the north bank and serves the community at a regional level. Refer to Chapter 10, the Parks and Recreation Element for more information.

## 14. 8/28/25 Draft - P. 234+, Appendix A - Definitions additions

**Best Available Science (BAS):** Information produced through a valid scientific process that WDFW or another local, state or federal agency has determined represents the best available science consistent with criteria set out in WAC 365-195-900 through 365-195-925. WDFW's PHS information is considered a source of BAS, and Volume 1 is an example of BAS regarding riparian ecosystems. (WDFW Vol 2).

**Ecosystem:** A spatially explicit unit of the Earth that includes all of the organisms, along with all components of the abiotic environment. Ecosystems have composition, structure, and functions. (WDFW Vol 1).

**Enhancement:** As utilized in WAC 173-700 for Wetland Mitigation Banks, it is the manipulation of the physical, chemical, or biological characteristics of habitat to heighten, intensify, or improve a specific ecosystem function(s). Enhancement results in the gain of selected habitat function(s) but may also lead to a decline in other ecosystem function(s). Enhancement does not result in a gain in habitat area. (WAC 173-700-104).

# WA State Dept. of Fish & Wildlife

## 14. 8/28/25 Draft - P. 234+, Appendix A - Definitions additions *continued*

**Fish and Wildlife Habitat Conservation Areas (FWHCAs):** An area to maintain populations of species in suitable habitats within their natural geographic distribution so that (1) the habitat available is sufficient to support viable populations over the long term, and (2) isolated subpopulations are not created. FWHCAs come in a variety of types including waters of the state, places with which listed species have a primary association, habitats and species of local importance, and riparian ecosystems. (WAC 365-190-130). "Fish and wildlife habitat conservation areas" do not include such artificial features or constructs as irrigation delivery systems, irrigation infrastructure, irrigation canals, or drainage ditches that lie within the boundaries of and are maintained by a port district or an irrigation district or company. (RCW 36.70A.030 (12)).

**Fish habitat:** The habitat used by any fish at any life stage at any time of the year, including potential habitat likely to be used by fish which could be recovered by restoration or management and includes off-channel habitat. (WAC 220-660-030 (52)).

**Impervious surface:** Surfaces that resist or prevent water infiltration, e.g., roofs of houses, roadways. (WDFW Vol 2).

**Low Impact Development (LID):** A stormwater and land use management strategy that strives to mimic natural hydrologic conditions by emphasizing the pre-disturbance hydrologic processes of infiltration, filtration, storage, evaporation and transpiration. (WDFW Vol 2).

# WA State Dept. of Fish & Wildlife

## 14. 8/28/25 Draft - P. 234+, Appendix A - Definitions additions *continued*

**Mitigation:** Is (1) Avoiding the impact altogether by not taking a certain action or parts of an action; (2) Minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts; (3) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; (5) Compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and/or (6) Monitoring the impact and taking appropriate corrective measures. (WAC 197-11-768).

**No net loss:** Standards that are intended to limit the impacts from new development and other land uses by adopting a mitigation hierarchy to avoid, minimize, remediate, and offset negative impacts on ecosystems. (WDFW 2024).

### **Open Space:**

(a) any land area so designated by an official comprehensive land use plan adopted by any city or county and zoned accordingly;

# WA State Dept. of Fish & Wildlife

## 14. 8/28/25 Draft - P. 234+, Appendix A - Definitions additions *continued*

(b) any land area, the preservation of which in its present use would;

- i. conserve and enhance natural or scenic resources;
- ii. protect streams or water supply;
- iii. promote conservation of soils, wetlands, beaches or tidal marshes;
- iv. enhance the value to the public of abutting or neighboring parks, forests, wildlife preserves, nature reservations or sanctuaries or other open space;
- v. enhance recreation opportunities;
- vi. preserve historic sites;
- vii. preserve visual quality along highway, road, and street corridors or scenic vistas; and/or
- viii. retain in its natural state tracts of land not less than one acre situated in an urban area and open to public use on such conditions as may be reasonably required by the legislative body granting the open space classification

(c) any land meeting the definition of farm and agricultural conservation land under subsection (8) of this section. (RCW 84.34.020)

# WA State Dept. of Fish & Wildlife

## 14. 8/28/25 Draft - P. 234+, Appendix A - Definitions additions *continued*

**Restoration:** As utilized in WAC 173-700 for Wetland Mitigation Banks, it is a broad term referring to both reestablishment and rehabilitation (WAC 173-700-104).

**Riparian:** The area adjacent to a water body (i.e., stream, river, lake, pond, bay, sea, ocean). Riparian areas are sometimes referred to by different names: riparian ecosystems, riparian habitats, riparian corridors, or riparian zones (WDFW Vol 1).

*Additional definitions provided by WDFW that were not referenced in the Comprehensive Plan were added to the Critical Areas Ordinance that is currently being updated.*

# WA State Dept. of Commerce

## 15. 8/28/25 Final Draft - P. 2 & 3, Table of Contents & Applicable Chapter Titles clarifications

Chapter 5 - Land Use Element

Chapter 6 - Housing Element

Chapter 8 - Transportation Element

Chapter 9 - Essential Public Facilities Element

Chapter 10 - Parks & Recreation Element

Chapter 11 - Capital Facilities & Utilities Element

Chapter 12 - Climate Change & Resiliency Element

## 16. 8/28/25 Final Draft - P. 40, Figure 4-3 clarification

Add footnote to Figure 4-3: Note: Chart percentages are out of scale.

## 17. 8/28/25 Final Draft - P. 49 & 50, clarifications on Section 5.2 - Map 5-1: Millwood Land Use / Zoning Map

Section 5.2, 2nd Paragraph: By adopting the following zoning categories, the city hopes to achieve a denser commercial development along Trent Avenue and Argonne Road, infill development in the residential areas and the creation of a multi-family zone to allow for higher density residential development. ~~Below in~~ Table 5-1 ~~are lists~~ the zoning categories with descriptions and Map 5-~~2~~-1 show this information in the ~~land use /~~ zoning map. Refer to Section 5.4 - Urban Growth Area (UGA) and Map 5-3 for information on the Valley UGA.

Add to Map 5-1: Note: Land Use Categories are identical to Zones in the City of Millwood, and the Millwood Urban Growth Area (UGA) is contiguous with the City Limits (City boundary).

Change Map 5-1 Title: Map 5-1: Millwood Future Land Use ~~/Zoning~~ Map

# WA State Dept. of Commerce

## 18. 8/28/25 Final Draft - P. 64 & 65, clarification in Section 5.4 - Urban Growth Area (UGA) & Map 5-3

Spokane County has designated a fairly large area to the north as a designated UGA, referred to as Valley UGA. The UGA establishes a boundary around developing areas, everything outside the boundary is intended for rural land use. The City of Spokane Valley identified the Valley UGA as a “Spokane Valley Urban Growth Area (UGA)” on their Future Land Use Map in 2019. It is anticipated that the Valley UGA will remain a future expansion area for the City of Spokane Valley.

Map 5-3: *“It is difficult to see the boundaries of the City of Millwood adjacent to the UGA and the labels on the map”, update the map for readability.*

# Millwood City Attorney

## 19. 8/28/25 Final Draft - P. 16, additional clarification language in Section 3.1 – Historic Preservation

### Historic Preservation

Millwood residents' value their historic heritage, they want to continue to recognize and grow the number of historic designated homes and districts within the city. Resources and incentive programs offered by the National Register of Historic Places and the Local Register should be readily available for those interested in the restoration of their historic site. **To encourage participation from property owners, a professional staff liaison for the Historic Preservation Commission that is knowledgeable about all aspects of historic preservation including grants and funding opportunities, could be utilized, subject to funding and availability.** Preservation of Millwood's historical heritage allows the City to maintain its unique character while increasing property values and community pride.

## 20. 8/28/25 Final Draft - P. 17, additional clarification language in Section 3.1 – Public and Open Space

### Public and Open Space

**Millwood needs a safe, pedestrian/bicycle connection to the adjacent Centennial Trail as well as Spokane River access that is safely useable and insurable or river view access, if useable land isn't appropriate or available. The Interurban Trail provides a non-motorized connection through the City of Millwood, south of E. Euclid Ave. / E. Empire Way connecting Millwood City Park to the CBD and the western City neighborhoods via former railroad right-of-way. Millwood should encourage adjoining municipalities to improve the trail west of Vista Rd. as well as to the east, to provide continued linkage. Millwood will preserve and maintain the City's tree-lined boulevards and improve Millwood's parks, recreation, and open space for a variety of users.**

# Millwood City Attorney

## 21. 8/28/25 Final Draft - P. 126, revise language in Section 8.6 – Level of Service Standards

### **Bicycle & Pedestrian Infrastructure (Active Transportation)**

Even though there is no need for capacity based on roadway improvements, the city may elect to enhance its roadway network to better suit the needs of pedestrians and cyclists in order to exceed the WSDOT Urban Minimum Multimodal LOS. As discussed in Chapter 10, Parks and Recreation Element, the City will coordinate with adjoining jurisdiction for trail expansions and connections. The City will also work towards increasing the sidewalk network around schools and ADA compliance with detectable warning device additions and sidewalk improvements.

~~The City of Millwood has explored franchise agreements for public bikeshare and scooter share services such as the Lyme scooters that are utilized throughout the Spokane area; however, there have been issues with the scooters being thrown into the Spokane River from the Argonne Rd. bridge, which has delayed interlocal agreement establishment.~~

Improvements to Millwood's active transportation network will likely be completed as road improvement projects are conducted, such as the Argonne Rd. Corridor Improvement Project or when funding is available and has been obtained through programs such as safe routes to school. The City of Millwood has explored franchise agreements for public bikeshare and scooter share services such as the Lyme scooters that are utilized throughout the Spokane area.