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December 9, 2009

E. Susan Meyer
Chief Executive Officer
Spokane Transit Authority
1230 West Boone Avenue
Spokane, WA 99201
Email: Smeyer@spokanetransit.com

Re: Browne's Addition Buses – Route 60 and Route 61¹

Dear Ms. Meyer:

I thank you for responding to my public records request concerning the Browne's Addition Neighborhood increased bus traffic situation.²

My neighbors and I³ are growing increasingly concerned about the substantially

¹ This letter is available on the internet in PDF format with live links to various resources cited and referred to. Go to http://www.steveeugster.com/sta_brownes_addition.htm.

² The information you have provided has been put on line at www.SteveEugster.com at this link www.steveeugster.com/STA/sta_response_pda.pdf for your reference and the reference of others who may be interested. My check in the sum of \$5.85 to pay for the copying costs is enclosed. Thanks.

³ I do not mean to "toot my own horn" but I am proud of the fact that I am a former Spokane City Council member, a former member of the Spokane Transit Authority Board, and a long term homeowner and many-year resident of Browne's Addition. I am the second owner of the home I live in. The home was built in 1928 as a wedding present to Dorothy Dwight, one of the daughters of the historic Dwight Family of Browne's Addition.

I am also an occasional user of Spokane Transit. I use the buses on various routes in Spokane. These

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increased bus traffic in front of our homes in Browne's Addition, in the West 2400 Block of Pacific Avenue.

Comparison of Bus Frequency at Selected Spokane Locations

My neighbors and I have done an analysis of some of the various bus routes in Spokane and compared them to be the current Browne's Addition bus routes – Route 60 Airport/Browne's Addition and Route 61 Highway 2/Browne's Addition. These Routes, 60 and 61, have been running for some time. Now, STA has routed them through the Browne's Addition Neighborhood.

My neighbor, Karl Fleming, has completed a report. [Karl Fleming, COMPARISON OF BUS FREQUENCY AT SELECTED SPOKANE LOCATIONS \(November 20, 2009\).](#) Appendix 1. The information developed is disturbing. Here is the Report Summary (Appendix 3):

Comparison of bus traffic at selection locations in Spokane is provided in Table 1 and Figure 1. These locations include 5 routes along major Spokane arterials and 3 routes with stops in residential neighborhoods. These exhibits were developed from information taken off the Spokane Transit Authority web site as shown in Figures 2 through 13. The following conclusions are supported by this comparison.

1. Bus Frequency in Browne's Addition along Pacific and Second Ave from Routes 60 and 61 is comparable to the bus frequency along major arterials in Spokane such as those on Division and Wellesley and is the highest frequency along any single route in the Transit District (8 buses per hour).

include buses traveling north and south on Division St., north and south on Hamilton, east and west on Wellesley, from the transit center to and from the Spokane Valley Mall, and, of course, Route 40 Browne's Addition.

2. Bus frequency along comparable residential streets on the South Hill (Route 44 at Bernard) and North Side (Route 29 at Napa) is only half the frequency in Browne's Addition. There are even some bus stops on very busy arterials (Route 44 on Grand, Route 22 on Wellesley and Route 60 on Sprague) that have a lower bus frequency than that in Browne's addition

3. Browne's Addition appears to be one of the only if not the only residential street where there are two major routes that overlap on the same streets. The only other examples of this that were identified were either downtown or on major arterials.

4. If only one of these routes ran through Browne's Addition the resulting bus frequency would be comparable to other residential neighborhoods within the Transit District.

5. As a residential neighborhood, Browne's Addition appears to be unique in terms of the high rate of bus traffic.

Character of Route 60 and Route 61: Impacts of Diversions into Browne's Addition

It must be emphasized, before I proceed further, that the "new" routes are long-standing, long distance routes. These routes have, as their main objects, destinations many miles from Downtown Spokane.

These long distance routes have been running adjacent and contiguous to the Browne's Addition Neighborhood on the Sunset Highway, Highway 2. Now they have been diverted into the Browne's Addition Neighborhood, detoured, if you will.

Also, these route buses are used to high speeds of 45 mph and above. There is no

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neighborhood orientation or demeanor to them. Also, they are nearly twice the size of the Route 40 Browne's Addition, a route and bus which ran for many years to the satisfaction of the residents and property owners of Browne's Addition.

These buses pass one another. The street in front of my house is 50 feet wide. There is parking on both sides. Yet, the buses pass each other.

The speed limit on West Pacific Avenue is 25 mph. Though I have not put a radar gun on the buses going east and west it appears to me that often they are traveling in excess of 25 mph. This is especially true regarding the buses as they travel west on Pacific Ave.

Just what has STA done by doing away with Route 40 and replacing it with Route 60 and Route 61? STA has done away with a local small bus which had minimal neighborhood impact with two larger buses which are not local buses and have significant neighborhood impact. And, it has done much more:

Browne's Addition: An Historic Neighborhood

The two new routes are not Browne's Addition routes at all. They are long range routes which go from downtown Spokane to destinations far beyond downtown Spokane and Browne's Addition to the Airport and to Airway Heights. STA are bring arterial buses and traffic to Browne's Addition.

STA has brought the Sunset Highway, Highway 2, into the center of Browne's Addition. Appendix 21.

Numerous Browne's Addition Homeowners have been gradually restoring their historic properties. They have signed agreements with the city regarding the development and redevelopment of their properties. They have agreed to improve their properties in such a way to restore and enhance the historic nature of Browne's Addition. They have placed limits on how, and to what extent, their properties can be developed and further restored into the future.

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Increased bus traffic, especially, of two bus routes, not one route, with increased timing frequency, clearly damages the value of their properties and the value and character of the Browne's Addition Historic District. Appendix 21.

A Better Alternative: Latah and Southwest Spokane

The area of the Spokane Transit Authority Public Transportation Benefit Area includes substantial population areas in the south-Southwest area of Spokane which are not receiving service by STA. Appendix 22.

There is no bus service beyond the junction of the old inland Empire highway and US 395. The Latah Creek shopping area is not being served. The manufactured home development adjacent to the Latah Creek shopping Center is not being served. The area south of the shopping center and the area known as Eagle Ridge does not have bus service. A substantial apartment complex on Thorpe Road likewise has no bus service.

The people in these areas pay significant sums in taxes to Spokane Transit. As I previously said, all of these areas are within the STA Public Transportation Benefit Area. Appendix 22.

In addition, the service provided on the Latah Route 41 is quite minimal. Appendix 33. It needs to be enhanced and it needs to be extended.

Browne's Addition does not need Route 60 and Route 61 to come into the neighborhood. The areas served by Route 60 and Route 61 are accessible to the people in Browne's addition by virtue of the fact that these routes pass adjacent to Browne's addition. Appendix 19 and 20.

These routes, are not accessible to the areas south of The Inland Empire Highway and US 395.

It would seem that much could be gained by enhancing the Latah Route 41. This enhancement would run on the Route through Brown's addition, and

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neighborhoods immediately to the west, the Latah Valley shopping Center, the residential areas south of the shopping center and the residential areas north of the shopping center East and West of US 395 and south of I5. This route could run consistently at regular intervals throughout each day. There would be considerable benefit to this alternative.

It would seem to me that the people of Browne's Addition, Vinegar Flats, Eagle Ridge, Latah Valley would be better served with a bus system which combined Route 40 and Route 41. People from these areas can always be able to access the areas west of Browne's Addition by transfer from Route 40 and 41 Route 60 or Route as they connect one another. This would be a substantial benefit to the area newly served.

STA has done some surveys to justify Route 60 and Route 61 into the Browne's Addition Neighborhood. Perhaps surveys would justify a new approach to service in areas of Southwest Spokane unserved and unconnected to the rest of the Spokane Public Transportation Benefit Area.

Environmental Policy Act

In the materials furnished to me I can find nothing which indicates that STA sought any sort of city environmental compliance. I have considered SMC 17E.050.230 regarding categorical exemptions and the WAC adopted by reference therein – WAC 197-11-800.

Perhaps I am overlooking something, but it seems to me STA should have complied with the City of Spokane Environmental laws.

One of the "reasons" for the elimination of Route 40 and the bringing of Route 60 and Route 61 into the neighborhood is said to be increased bus use. The increased bus use is a very clear and immediate impact. But it will do more, it will cause the neighborhood to change. The change will be increased demand for higher density development. The character of the neighborhood will change as a result. These changes will be contrary to the historic nature of the neighborhood and probably

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be contrary to the City of Spokane Comprehensive Plan,

Truck traffic is prohibited in the neighborhood except for local deliveries. See SMC 12.08.010 Streets Closed to Trucks.

Financial Considerations: The PTBA Service Area

The purpose of a public transportation benefit area is to provide transportation service in and about the area. The area is tied directly to service.

One must ask, could STA eliminate service to Medical Lake and Eastern State Hospital? Could it eliminate service to Airway Heights? The answer, of course, is clearly no. These areas are included in the area of the STA Public Transportation Benefit Area. Appendix 22. They must be served. Indeed, their mayors serve on the STA Board of Directors. See [RCW 35.57A.050](#).

The people and businesses of Southwest Spokane deserve and require STA service. They too are in the STA Public Transportation Benefit Area. If service is not provided, they should be relieved of the obligation to support STA. What would the reason be for the inclusion of such areas? See [RCW 35.57A.030](#). None. STA has no right to collect taxes from the people of these areas if it is not going to provide service to them and the areas in which they reside and pay taxes.

Spokane City Council

I do not see in any of the material that the City of Spokane was consulted in the diversion of these routes into the Browne's Addition Neighborhood. The Mayor was not consulted, the City Counsel President and Council Members were not consulted.

CONCLUSION

I request that STA rethink this situation. I also request that STA and the city of Spokane through Mayor Verner and the City Council President and members of

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the Spokane city Council consult together regarding the difficulty posed by running Route 60 and Route 61 through the Historic Brown's Addition Neighborhood and the lack of service and inequities in, and of, not providing service to the extensive residential and commercial areas in South Spokane.

I look forward to hearing from STA and you.

Very truly yours,

/s/ Stephen K. Eugster

Stephen K. Eugster

Appendix Enclosed

INTERNET RESOURCES:

[WWW.STEEVEUGSTER.COM](http://www.steveeugster.com) –
http://www.steveeugster.com/sta_brownes_addition.htm.

Karl Fleming, COMPARISON OF BUS FREQUENCY AT SELECTED SPOKANE LOCATIONS (November 20, 2009 –
www.steveeugster.com/STA/STA_comparison.pdf.

Route 41 Latah
<http://www.spokanetransit.com/rideSTA/routesschedules.asp>

Route 60 Airport/Browne's Addition
<http://www.spokanetransit.com/rideSTA/routesschedules.asp>

Route 61 Highway 2/Browne's Addition
<http://www.spokanetransit.com/rideSTA/routesschedules.asp>

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STA Public Transportation Benefit Area Map

<http://www.spokanetransit.com/aboutSTA/publictransitbenefitmap.asp>

Browne's Addition Historic Neighborhood

http://www.historicspokane.org/NR_districts.htm

Browne's Addition Map

<http://www.historicspokane.org/Maps/BrownesPeacefulValley.pdf>

Copies plus enclosures to:

Spokane Mayor, Mary Verner
Council President, Joe Shogan
Council Members

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