

APPENDIX J

NEPA/SEPA Overview for DivisionConnects Transit Project Technical Memo

MEMORANDUM

DATE: April 1, 2021
 TO: Spokane Regional Transportation Council
 FROM: Parametrix
 SUBJECT: NEPA/SEPA Overview for Division Connects Transit Project

INTRODUCTION

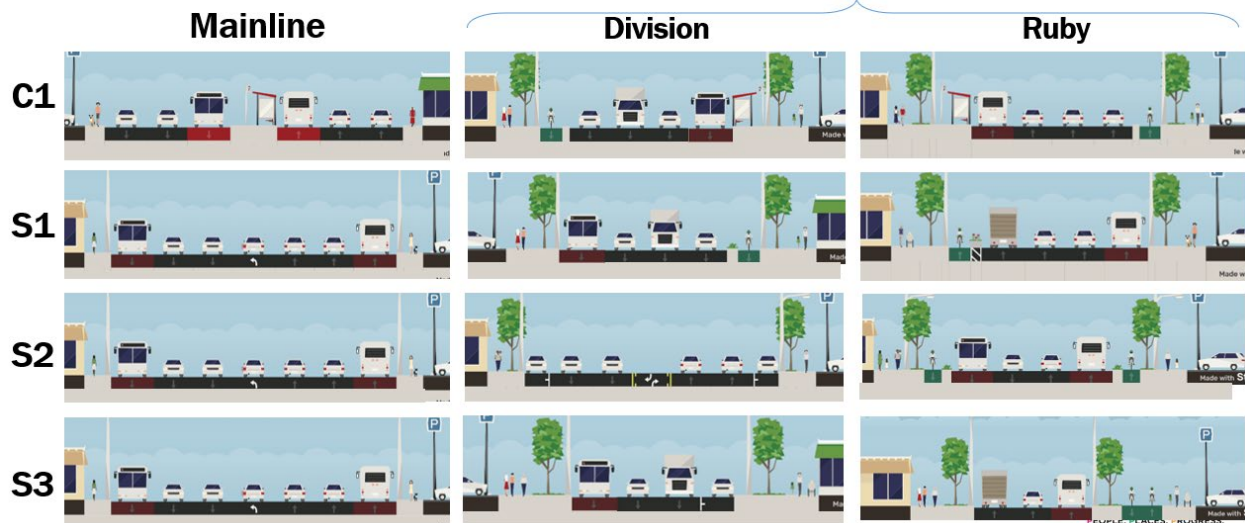
The purpose of this memorandum is to provide an overview of existing environmental conditions within the Division Street corridor study area and to identify the potential environmental impacts from the addition of bus rapid transit in the Division Street corridor. The study area was defined as the .25 miles surrounding the proposed project alignment from the existing transit plaza (located between N. Post Street, W. Riverside Ave., N. Wall St., and Sprague Avenue), north along the mainline on N. Division Street, the Ruby Street Couplet, and the six “Y” scenarios (Scenario A, A+, B, C, D, and H) under consideration, between W. 1st Avenue to the South, north to E Hastings Road and E Farwell Road. That study area was used to identify existing environmental conditions and potential impacts from the Division Connects transit project.

This overview also considers the various configurations that have been identified within those alignments, including locating BRT in the center of the roadway (Center Running Alternative – Scenario C1), as well as a standard business access transit (BAT) lane with both a one-way (Side-Running A Alternative – Scenario S1) and two-way (Side-Running B Alternative – Scenario S2) option for the Ruby Street Couplet, with various bike and pedestrian facility configurations (Side-Running C Alternative – Scenario S3), summarized below:

Refined scenarios (Draft Alternatives)

**all sections looking north*

Couplet



This overview is based on project information provided by the Spokane Regional Transportation Council and online environmental databases and sources, including:

- Washington Information System for Architectural and Archaeological Records (WISAARD)
- Washington Department of Archaeology and Historic Preservation
- Washington State Department of Ecology (Ecology) Facility/Site database and Toxics Cleanup Program Web Reporting database
- Washington Department of Fish and Wildlife
- Washington Department of Natural Resources Natural Hazard database
- Washington Recreation and Conservation Office (RCO) database
- U.S. Fish and Wildlife (USFW) National Wetlands Inventory (NWI)
- Federal Emergency Management Agency (FEMA) flood hazard information
- Wetland mapping from the City of Spokane and Spokane County
- Geological hazard mapping from the City of Spokane and Spokane County
- Spokane Housing Authority
- City of Spokane historic properties database
- Demographic data for the City of Spokane and Spokane County

The primary environmental resources identified in the study area are shown on the attached Figures 1-12. No fieldwork was performed to support this overview of environmental conditions.

RESOURCE OVERVIEW

Existing Conditions in the Study Area

The Division Connects transit project would be located within the City of Spokane and Spokane County. The southern portion of the corridor is urban and highly developed in nature, whereas the northern portion is more suburban and slightly less densely developed, with a few parcels that are somewhat rural in nature. The project would cross the Spokane River and would be located adjacent to several parks, trails, and historic sites, as well as within at least two designated historic districts. Some hazardous materials sites exist within the project study area, some of which are adjacent to the proposed alignments. Other environmental resources in the project study area include environmentally critical areas, such as flood prone areas, and minority and low-income communities.

POTENTIAL ENVIRONMENTAL IMPACTS

This section describes the potential environmental impacts for each of the Alternatives being considered for the Division Street transit project. The purpose of this evaluation is to provide a high-level summary of the potential environmental impacts and, to the extent possible at this stage, a comparative evaluation of potential environmental impacts from the various Alternatives.

Impacts Common to All Alternatives

Historic Resources

Several sites adjacent to the project alignment and more broadly within the study area are listed or determined to be eligible for listing on the National Register of Historic Places (NRHP) and/or the Spokane Register. In addition, the project alignment would be located within or adjacent to several historic districts. Historic resources are illustrated on Figures 1-4.

Parks and Trails

All of the Alternatives would cross shared use paths on either side of the Spokane River and would be adjacent to at least two parks (Franklin Park and BA Clark Park). Any impacts to those parks or paths depend on whether any permanent or temporary acquisition would be required.

There are also several properties in the study area that are subject to Section 6(f) of the Land and Water Conservation Act, which requires that the conversion of lands or facilities acquired with Land and Water Conservation Act funds need to be coordinated with the National Park Service. Parks and trails are also identified on Figures 1-4.

Section 4(f)

Section 4(f) of the U.S. Department of Transportation Act of 1966, prohibits the U.S. Department of Transportation (DOT) agencies, including the Federal Transit Administration (FTA), from approving projects that would affect a park, recreation area, historic and cultural resource, or wildlife and waterfowl refuge unless there is no feasible and prudent alternative to the use of the land and includes all possible effort to minimize the harm.

As described above, there are numerous Section 4(f) properties adjacent to the proposed project alignments and within the study area. To the extent any of those properties would be affected, either temporarily or permanently, a different alternative would need to be selected or an analysis showing that there is no feasible and prudent alternative would be required.

Hazardous Materials

A preliminary review identified at least 15 potentially affected hazardous materials sites, shown on Figures 5-8. The potential impacts related to hazardous materials sites would depend on the type of site and the proximity to the project. Because those sites are all currently located along an existing, developed roadway, any impacts would be anticipated to be minor. Potential hazardous materials sites are identified on Figures 5-8.

Rivers and Lakes

All Alternatives would cross the Spokane River, which is a priority habitat for several species. The project may have some construction impacts to the river and nearby lake, but those impacts are not currently anticipated to be significant, since the project will be installed on an existing bridge crossing the river with no in-water construction. Rivers and lakes within and near the project study area are identified on Figures 9-12.

Natural Resources

Other than the Spokane River, no significant natural resources such as wetlands, floodplains, steep slopes, or other environmentally critical or geotechnical hazard areas are located adjacent to the proposed project alignments. Some floodplains are located within the study area, but no impacts would be anticipated.

Right-of-Way

The project is proposed to be located primarily within existing right-of-way (ROW) on Division Street, Ruby Street, and streets in downtown Spokane near the existing transit plaza. To the extent the project is located outside of existing right-of-way, the type and extent of impacts may be greater, and the potential impacts would vary based on the configuration of the BRT.

The Center-Running Alternative would require more right-of-way at intersections and stations than the other proposed configurations and, therefore, may have greater impacts than other configurations. Scenario D (for the Y-routes), which would add a new segment of roadway where no road currently exists (currently just BPA lines) may have greater impacts than the other scenarios because of the change in use. Right-of-way impacts would be minimal in the Y portion of the alignments, north of N. Country Homes Boulevard, because buses are anticipated to travel in existing general traffic lanes, rather than a new BAT or transit only lane.

Access/Transportation

The project is not likely to negatively impact transportation or access within the Division Street corridor study area. Transit, motorized, and non-motorized access is anticipated to be improved. It is possible that the Center-Running Alternative could have a greater impact on access to adjacent businesses and would create some access issues for pedestrians accessing stops. Additional buses in the downtown area, particularly near the existing transit plaza, could impact existing transit stops and access.

Environmental Justice

The study area is home to a population that is approximately 20% minority, which is slightly higher than the City of Spokane and Spokane County as a whole. The percentage of population with a disability in the study area along the Division corridor mainline, south of the Y, is slightly higher than the City and County as a whole.

Geography		% of population with a disability	Median Household Income	Vehicles Available				% limited English-speaking households	% of population racial/ethnic minority
				None	1	2	3+		
Y Scenarios	Scenario A	14.3%	\$ 48,927	3.7%	22.6%	34.0%	39.7%	1.1%	19.0%
	Scenario A+	14.0%	\$ 50,948	3.5%	22.2%	35.4%	38.9%	1.3%	18.4%
	Scenario B	14.2%	\$ 45,739	4.6%	26.4%	34.3%	34.8%	1.7%	22.5%
	Scenario C	15.2%	\$ 44,538	4.1%	25.3%	34.2%	36.4%	1.6%	21.0%
	Scenario D	14.6%	\$ 47,803	3.6%	23.8%	35.7%	36.9%	1.7%	19.4%
	Scenario H	14.3%	\$ 46,752	4.5%	24.5%	32.6%	38.4%	0.9%	21.1%
Division Corridor Mainline (Y to Plaza)		18.0%	\$ 36,439	7.4%	28.3%	35.6%	28.6%	0.9%	20.3%
Baseline	City of Spokane	15.7%	\$ 50,306	3.0%	23.9%	42.8%	30.3%	1.5%	19.0%
	Spokane County	14.5%	\$ 56,904	2.3%	18.4%	40.7%	38.6%	1.2%	15.4%

Source: 2019: ACS 5-Year Estimates

In general, the project would likely be beneficial to environmental justice populations by providing additional high frequency transit. Any benefit may be countered if displacement of low-income housing or other resources occurs as a result of the project, but none has been identified at this time.

Transportation

Transit performance would improve and corridor mobility is not anticipated to be significantly impacted. Side-Running A Alternative, which would consist of a BAT lane with one-way couplet, would likely improve corridor

mobility the most, whereas the Center-Running Alternative would have the biggest benefit for transportation performance.

Land Use

Land uses along the project alignment consist of general commercial, multi-family residential, some single-family residential. Unless a significant portion of land is acquired for the project outside of existing right-of-way, no significant land use impacts would be anticipated. Land use impacts in the northern portion of the alignment are likely to be minor, since no additional right of way would be needed in the Y portion of the alignment. Throughout the remainder of the project study area, any work outside of the existing right of way may convert parking to a new transportation use or impact structures and businesses, given their orientation toward the street.

Impacts Related to the Center Running Configuration

The Center-running Alternative would require more permanent and temporary acquisition of property adjacent to the project alignment, which, could result in greater impacts to various environmental resources. In addition to the potential impacts identified above, the utility impacts and construction impacts related to the Center-Running Alternative are likely to be greater than other configurations, since additional utility relocations and additional road closures during construction would be required.

Impacts Related to Side-Running B and C Alternatives

The Side-Running B and C Alternatives may have greater impacts than the one-way couplet, because changing from the existing one-way configuration would require greater modification to the existing environment.

NEPA/SEPA

SEPA and NEPA provide categorical exemptions/exclusions where an action is unlikely to have significant environmental impacts. Specifically, NEPA provides categorical exclusions (CEs) for actions that do not include significant impacts to planned growth or land use for the area; do not require the relocation of significant numbers of people; do not have a significant impact on any natural, cultural, recreational, historic, or other resource; do not involve significant air, noise, or water quality impacts; do not have significant impacts on travel patterns; or do not otherwise, either individually or cumulatively, have significant environmental impacts. Title 23 CFR Part 771, §771.117 and §771.118 list the categorical exclusions for FHWA and FTA.

These categorical exclusions include the installation of fencing, signs, pavement markings, small passenger shelters, traffic signals, and railroad warning devices where no substantial land acquisition or traffic disruption will occur, and for projects that will occur entirely within the existing operational right-of-way. Minor expansions of transit structures and facilities outside existing right-of way, such as bridges, stations or rail yards are also categorically excluded. An action that is otherwise described as categorically excluded may not be processed as CE if it involves a finding of “adverse effect” to historic properties or the use of a 4(f) property or is inconsistent with any Federal, State or local law, requirement, or administrative determination relating to the environmental aspects of the action.

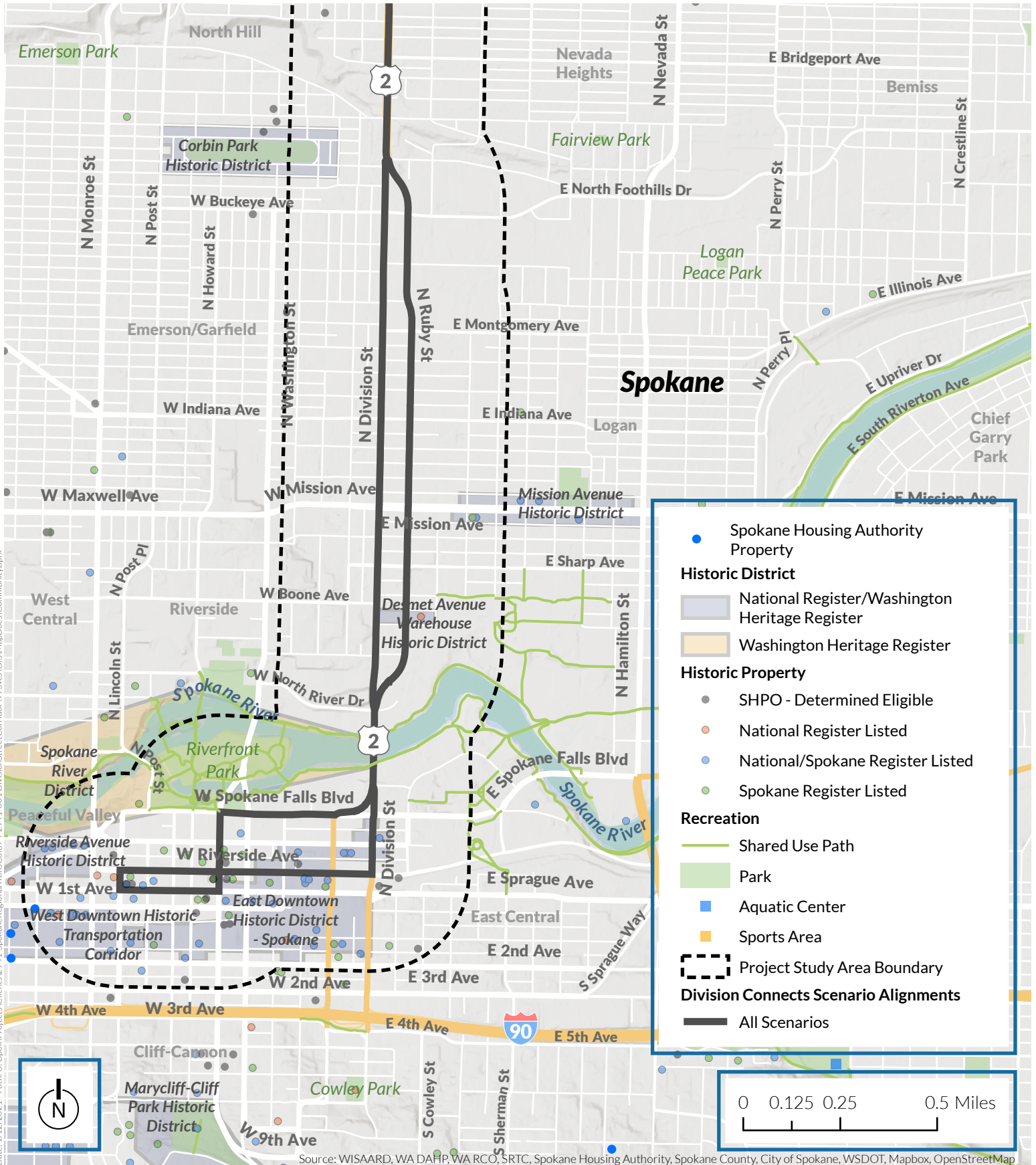
Because the proposal is anticipated to require acquisition and construction outside of the existing right-of-way and may impact a cultural, recreational, or historic resource, it is unlikely this project would fit clearly within a defined categorical exclusion.

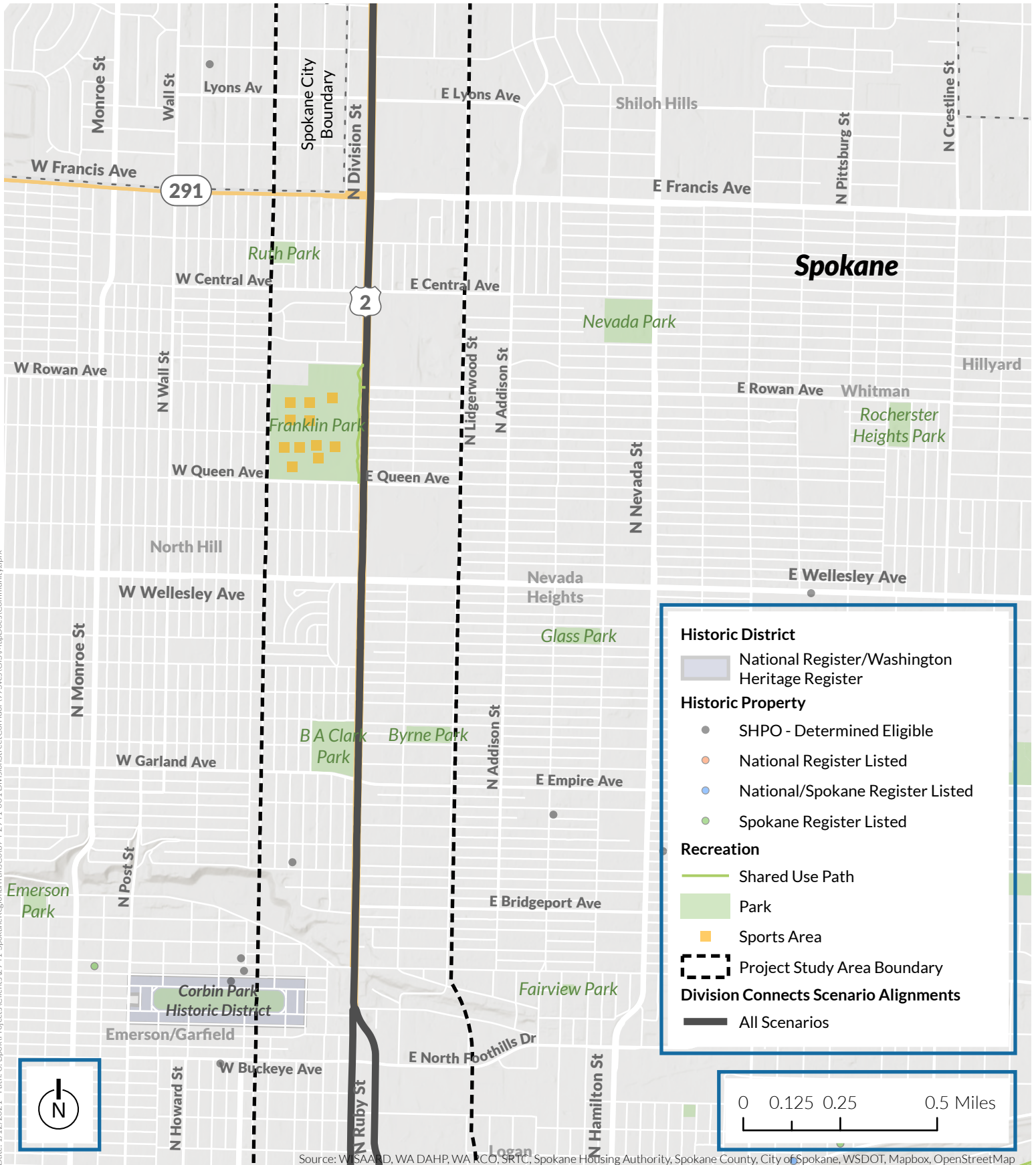
CONCLUSIONS

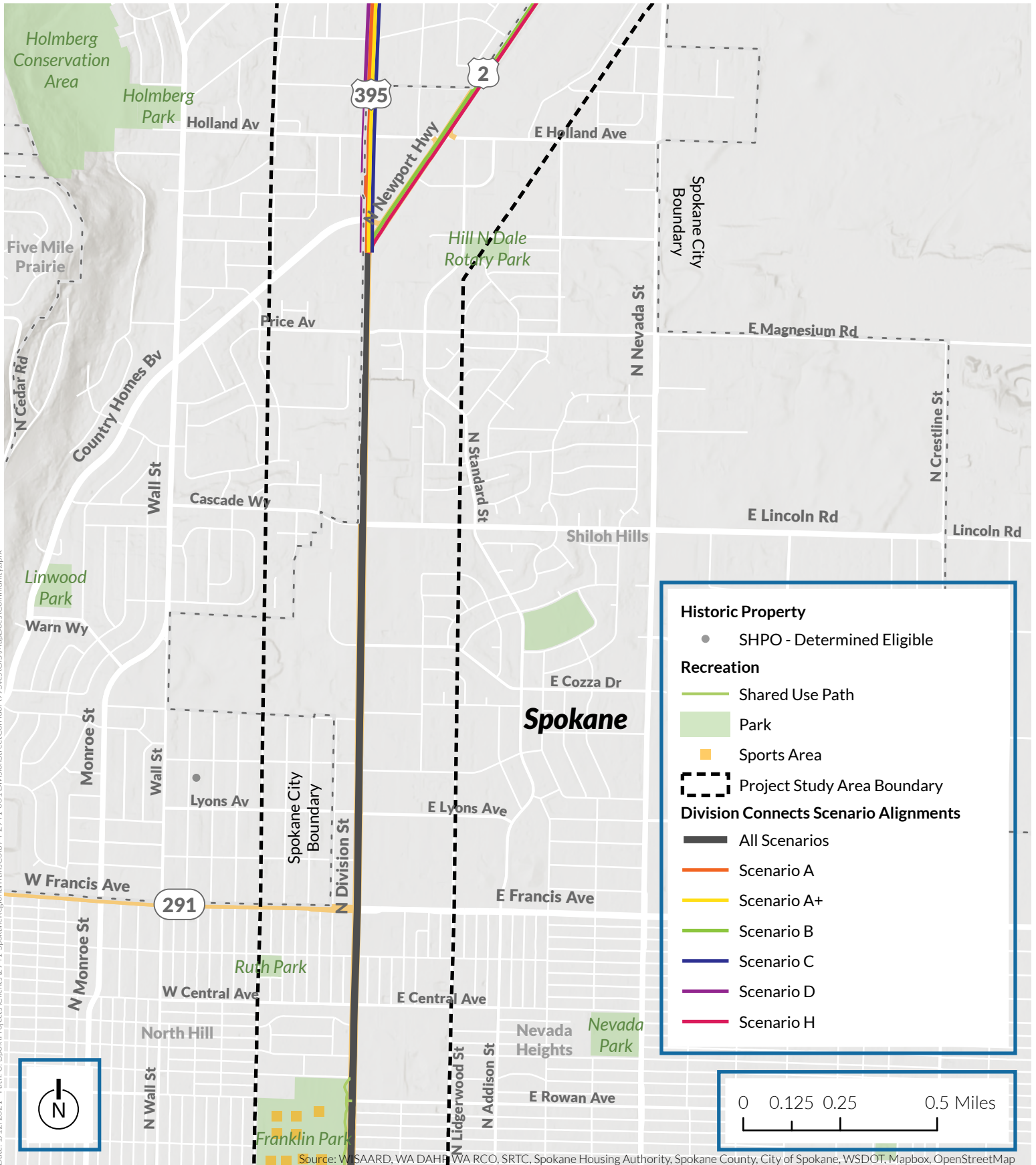
Based on a desktop review, the proposed Division Connects transit Project appears feasible and the potential impacts to most elements of the environment are likely to be minor given the urban/developed context of most of the study area and the location of the project within existing right-of-way.

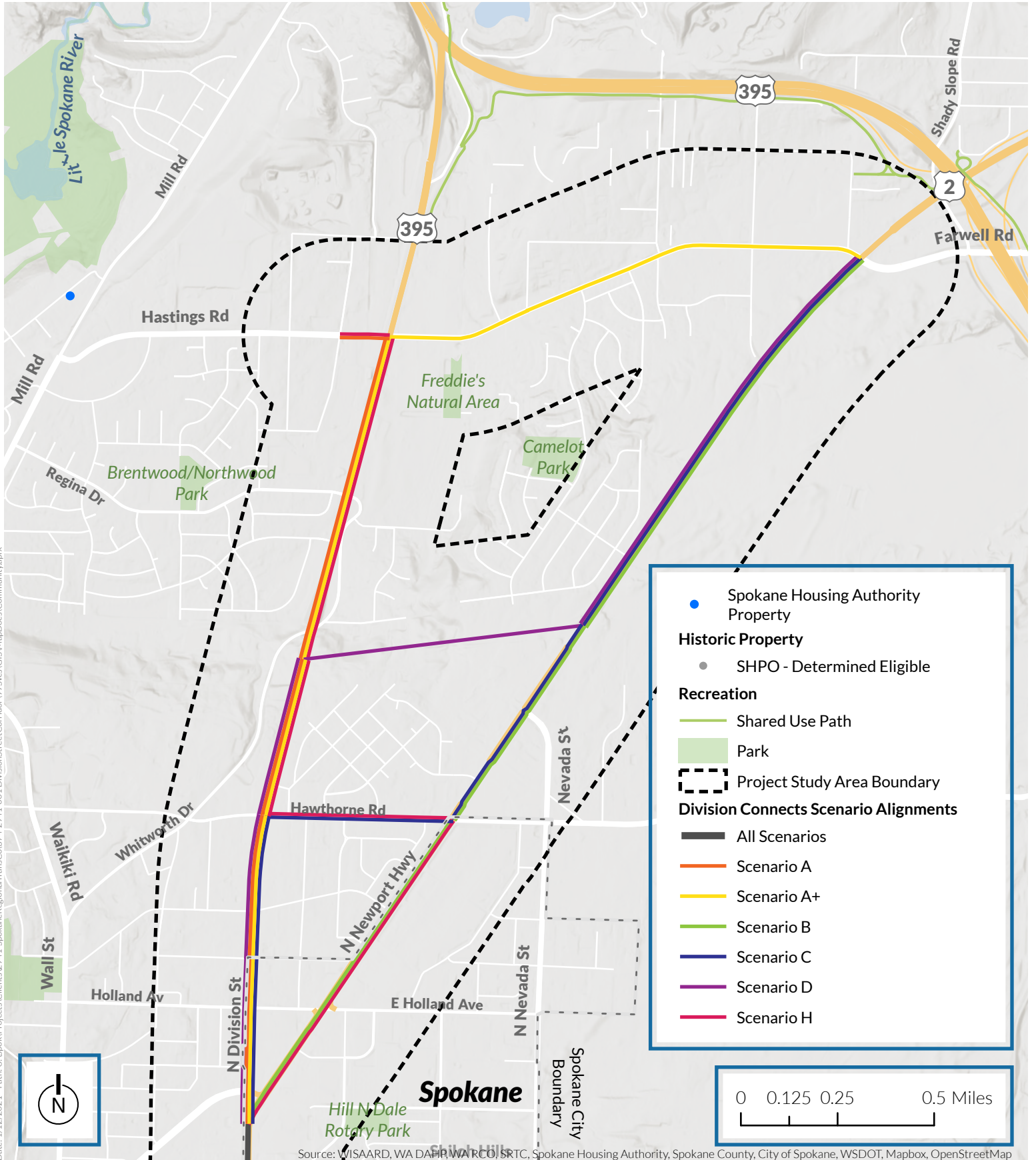
Based on the information currently available, it is anticipated that the Division Connects transit project will require an Environmental Assessment (EA) under NEPA. Whether an EIS is required would be depended on several factors:

- Whether the project is constructed entirely within existing right-of-way;
- Whether the project will impact any Section 4(f) properties or NHRP eligible or listed historic sites;
- Whether the project will significantly impact any hazardous materials sites; and
- Whether other unexpected significant impacts are identified.



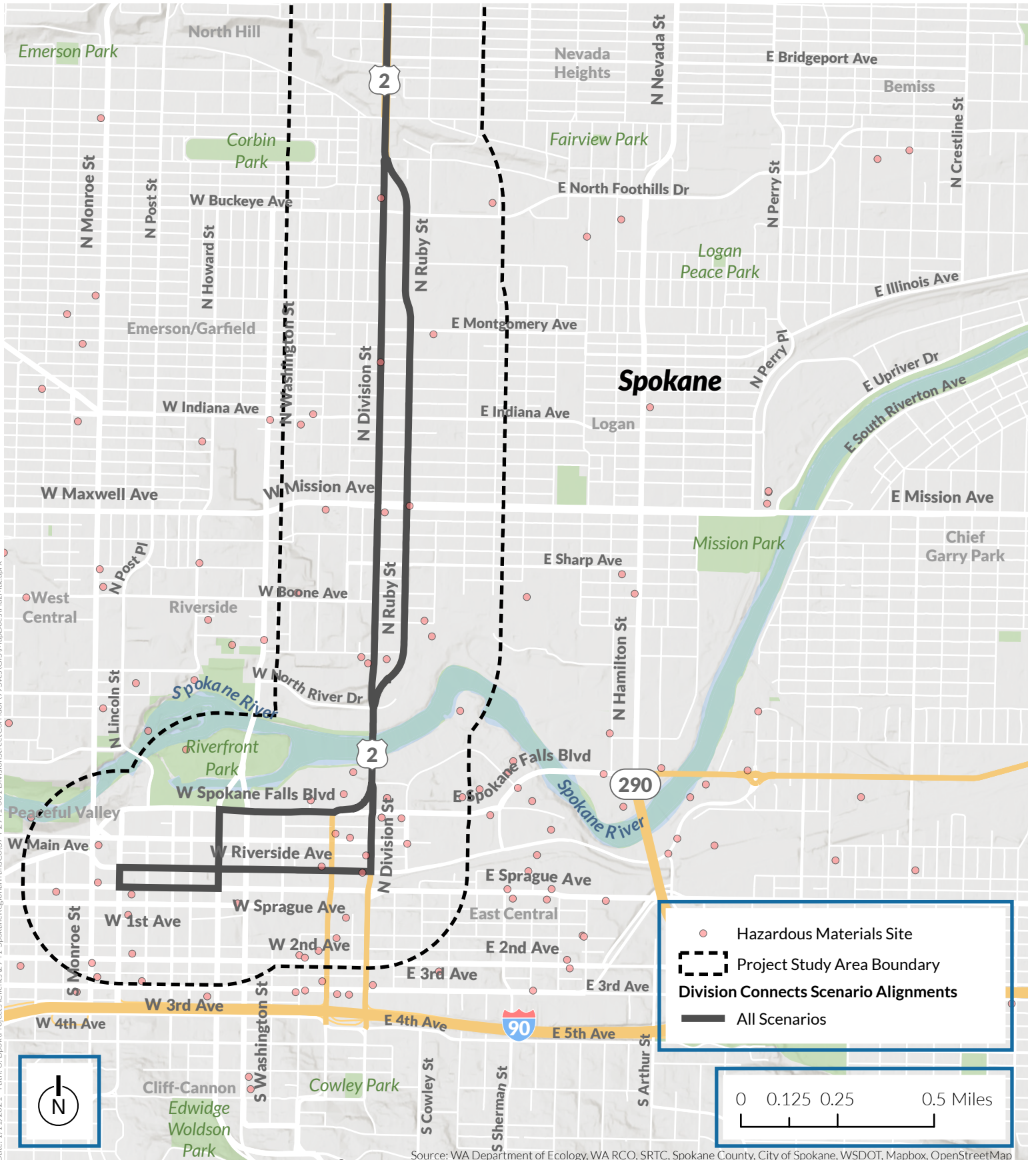






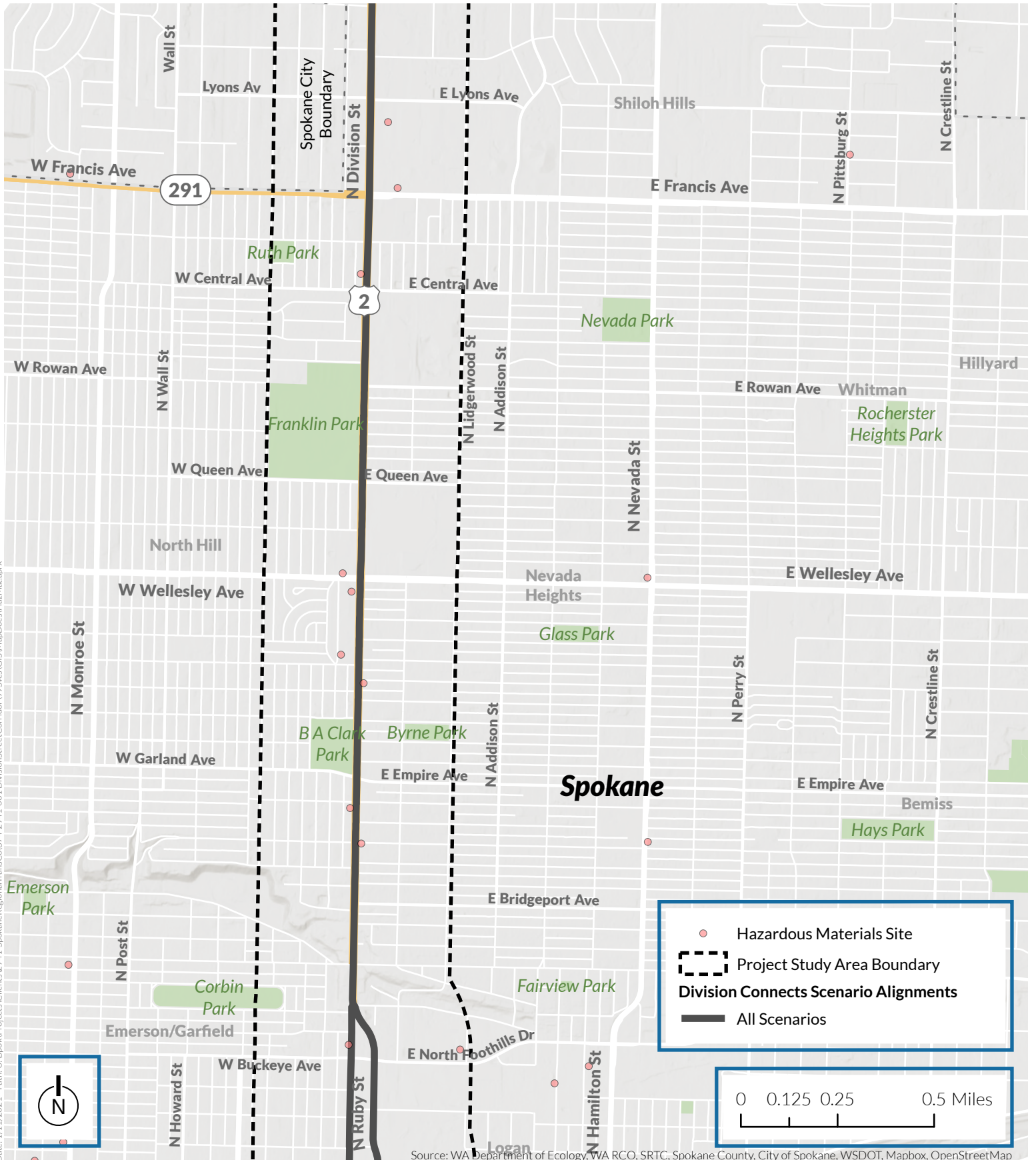
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Source: WISAARD, WA DAPM, WA RCO, SRTC, Spokane Housing Authority, Spokane County, City of Spokane, WSDOT, Mapbox, OpenStreetMap



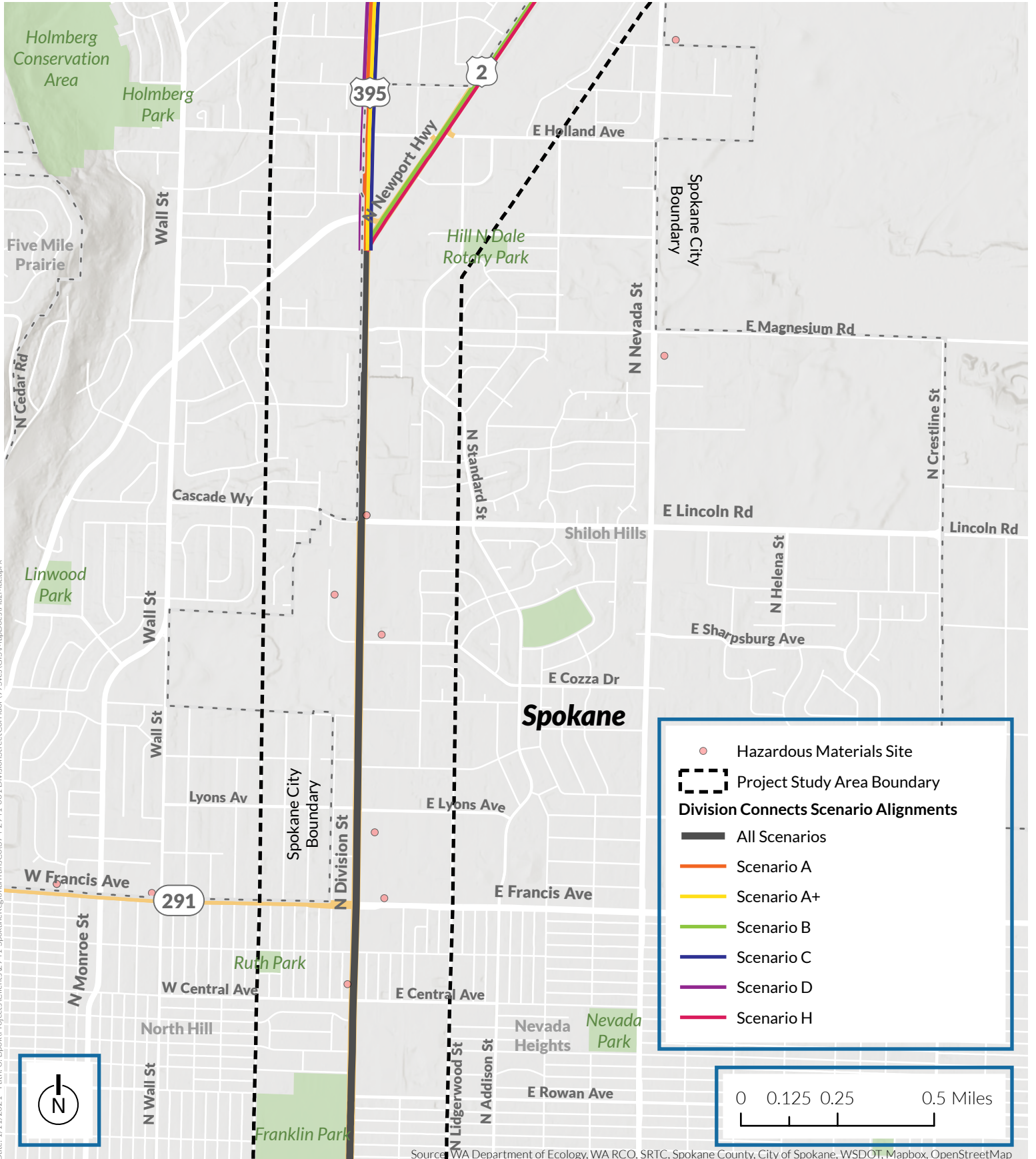
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Source: WA Department of Ecology, WA RCO, SRTC, Spokane County, City of Spokane, WSDOT, Mapbox, OpenStreetMap



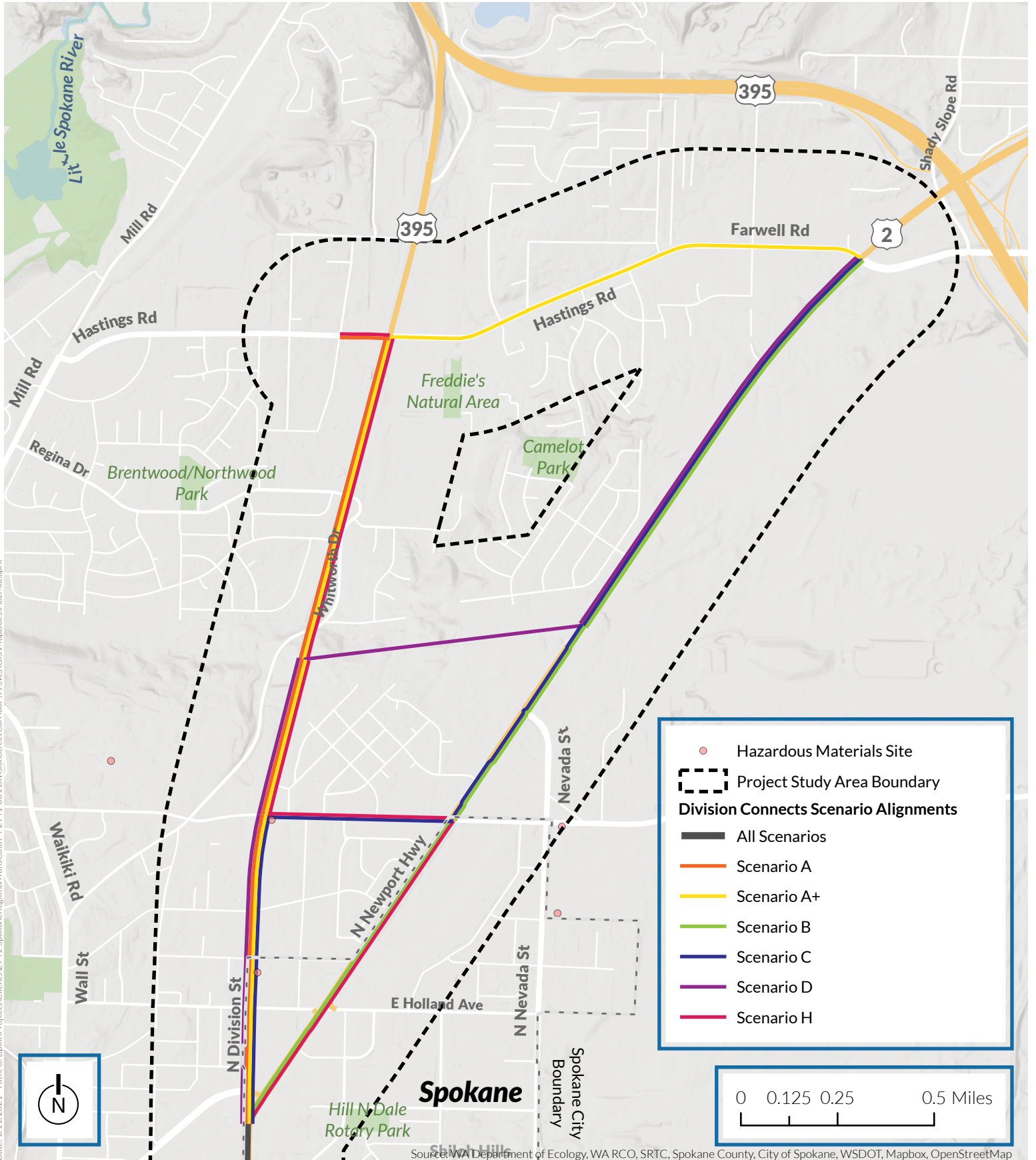
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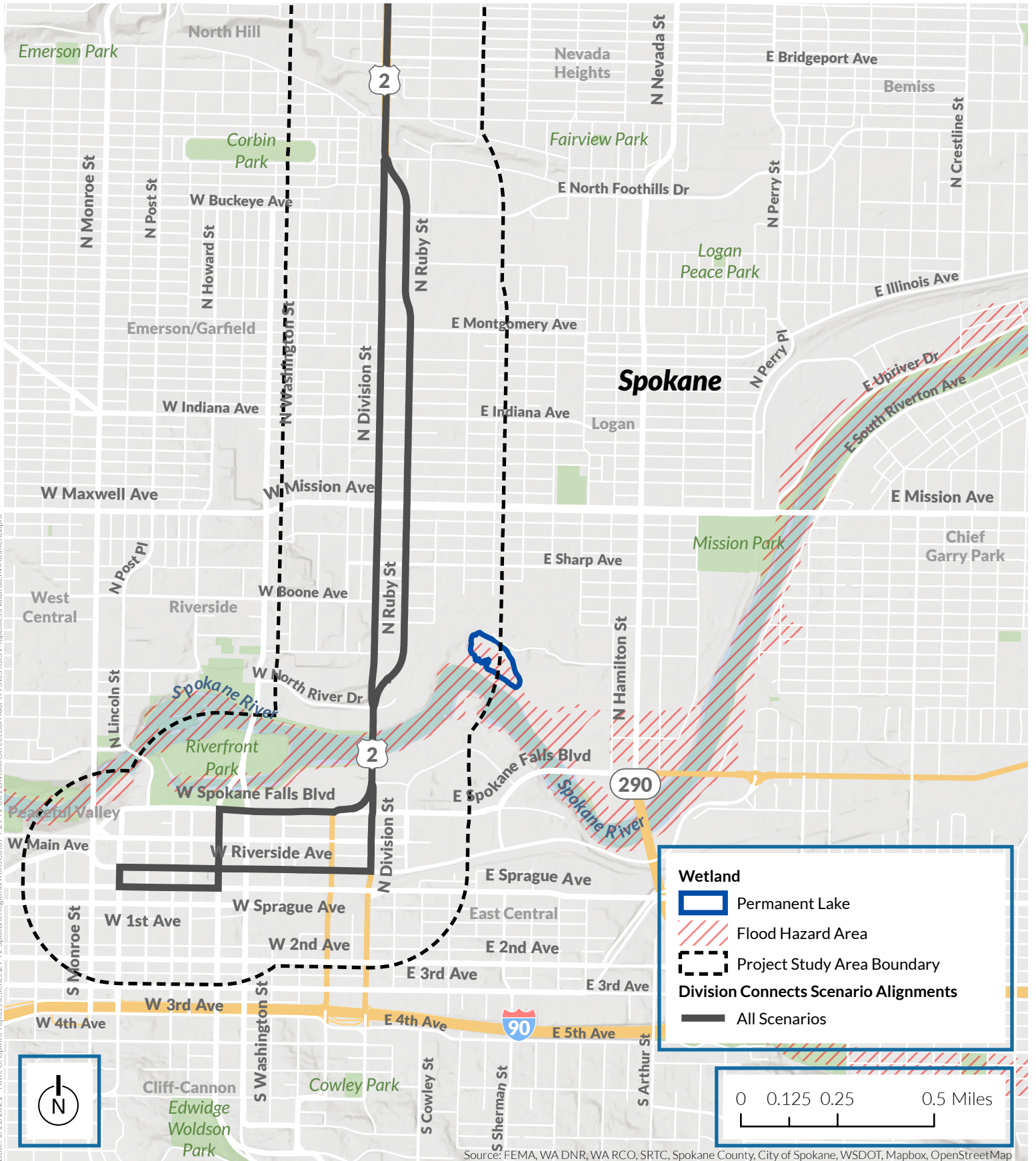
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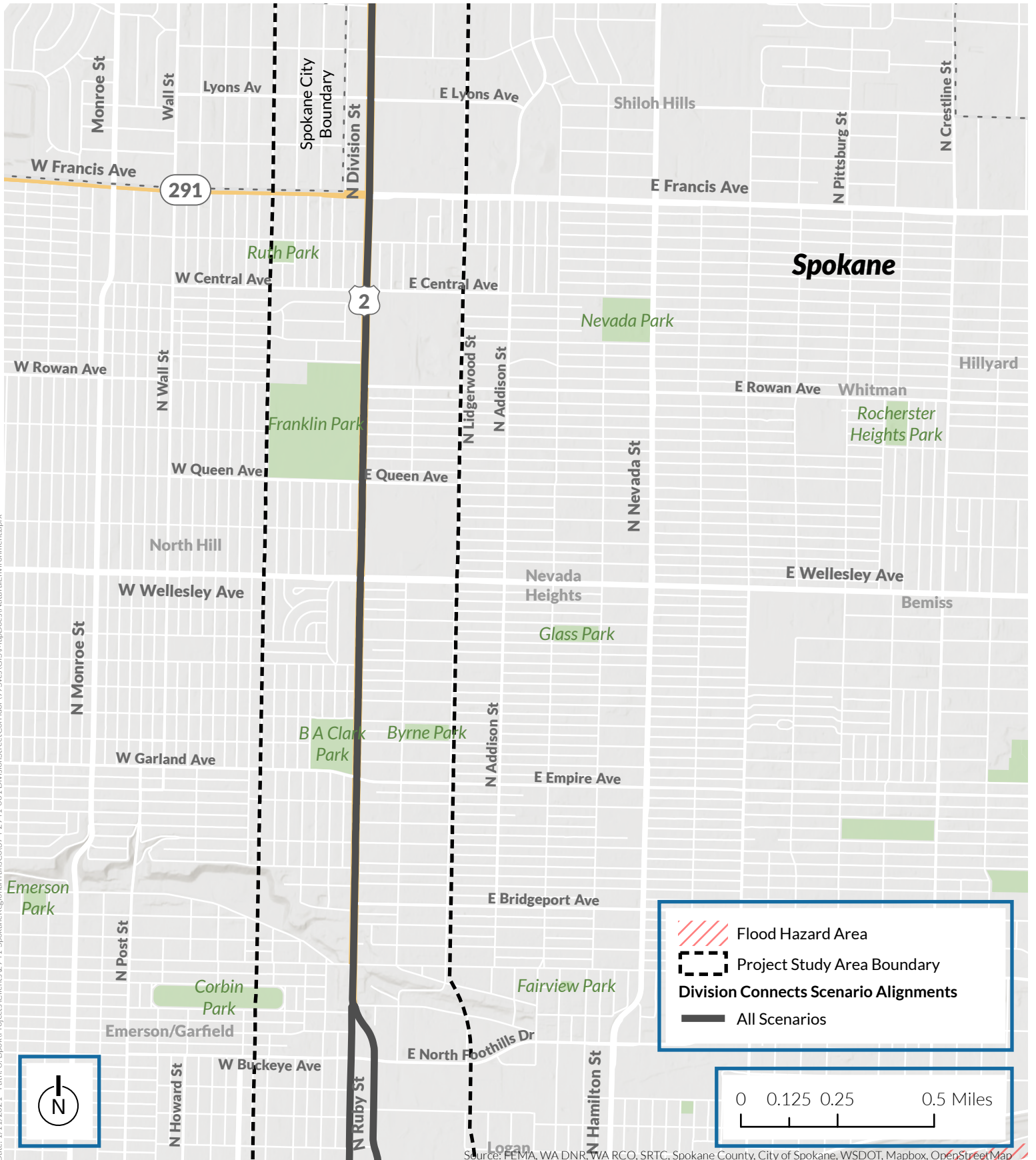


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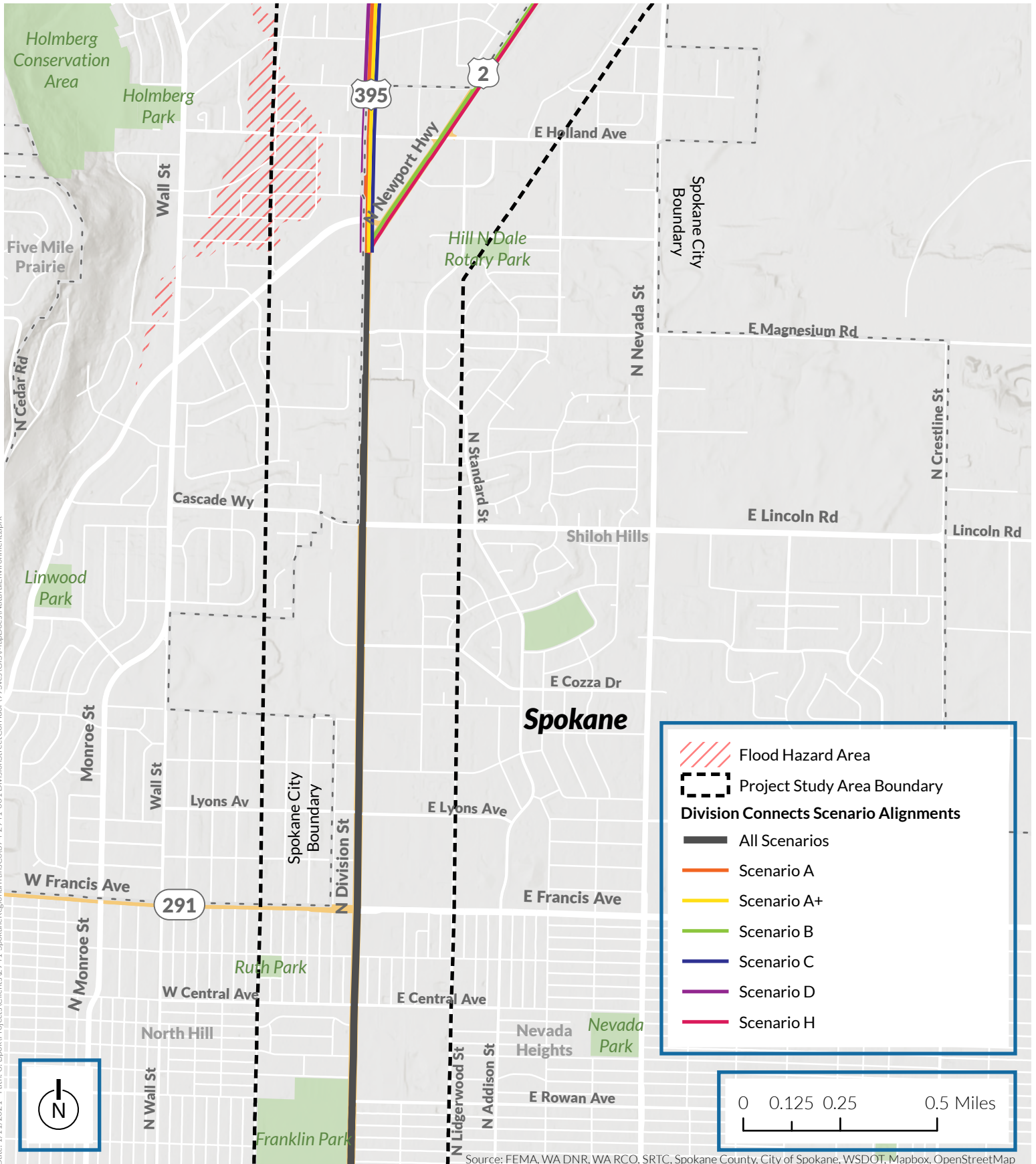
NATURAL ENVIRONMENT SEGMENTS 1 & 2



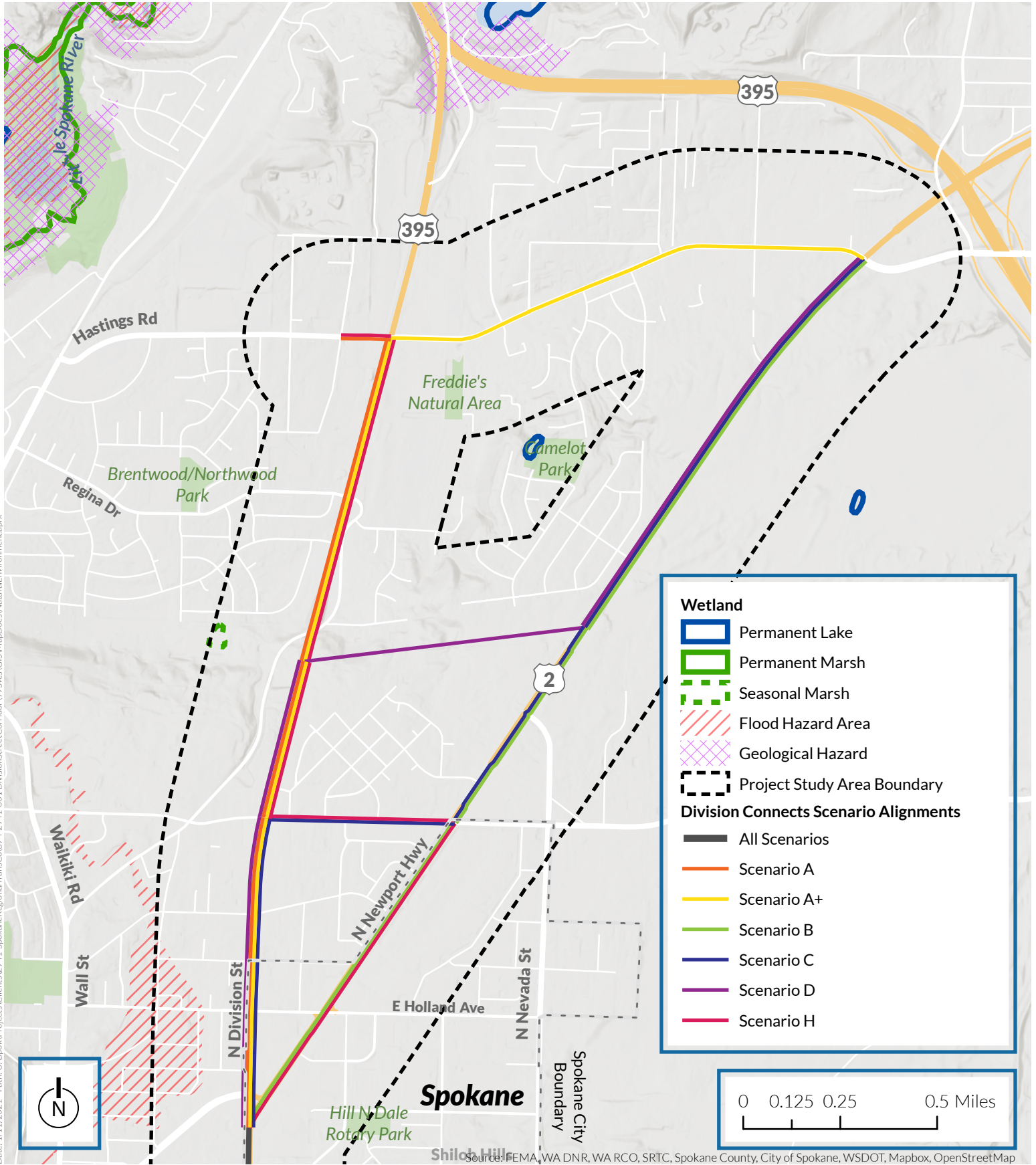


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Source: FEMA, WA DNR, WA RCO, SRTC, Spokane County, City of Spokane, WSDOT, Mapbox, OpenStreetMap



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