DATE OF SUBMISSION: 06/24/2026

TO: Federal Transit Administration

FROM: Dana Rivera | Parametrix

SUBJECT: Division Street Bus Rapid Transit Property Acquisition and Section 4(f)/6(f) Technical Memorandum

PROJECT NUMBER: 3745618003

PROJECT NAME: Spokane Transit Authority - Division Street Bus Rapid Transit Project

## INTRODUCTION

The Federal Transit Administration (FTA), in coordination with Spokane Transit Authority (STA), is proposing to construct the Division Street Bus Rapid Transit (BRT) Project (Project). The Project is primarily located in the City of Spokane and Spokane County, Washington. STA intends to apply for federal funds administered by FTA for the Project. As a result, the Project is considered a federal undertaking subject to the provisions of Section 4(f) of the Department of Transportation (DOT) Act of 1966, as amended in 23 Code of Federal Regulations (CFR) 774, and codified in 49 U.S. Code (U.S.C.) 303, and Section 6(f) of the 1965 Land and Water Conservation Fund Act of 1965, as codified in 54 U.S.C. Section 2003.

The purpose of this memo is to provide an initial assessment of potential environmental and community impacts related to property acquisitions and Section 4(f)/6(f) for the Division BRT Project. These may include potential property impacts and related displacements of existing uses, including residential properties, places of employment, businesses or institutions, community centers or service centers, and parks and recreational properties. This initial assessment of property impacts and related displacements is based on the conceptual design and does not serve as a formal definition of right of way needs.

## PROJECT DESCRIPTION AND AREA OF POTENTIAL EFFECT

STA is planning to upgrade and replace its existing Route 25 with BRT service, including new stations and roadway modifications that will provide a faster and more reliable bus service for the community. The Division BRT Project will increase overall mobility in Spokane County by delivering a high-quality, fast, and frequent transit service for the Division Street corridor. The 10-mile-long corridor is generally located along Division Street (U.S. Highway 2 and US 395) in the City of Spokane and parts of unincorporated Spokane County. It begins in the north, in the vicinity of the intersection of US 2 and Farwell Road, and it continues west along Farwell Road/Hastings Road, where it intersects with North Division Street. The corridor continues southbound along North Division Street to the Spokane River. This segment includes a couplet (two one-way streets) along North Division Street and Ruby Street between North River Drive and Cleveland Avenue. The Project corridor continues into and terminates in downtown Spokane.

The Project will encompass several capital and service investments, including a fixed-guideway BRT using zero-emission 60-foot buses. On weekdays, buses will run at least

every 15 minutes, with the preferred alternative operating at 10-minute intervals or better for most of the day. During nights and weekends, the service will maintain a 15-minute frequency for most hours. A new transit center will be constructed near Farwell Road and US 2. Operational improvements to enhance speed and reliability will feature off-board fare payment, transit signal priority, all-door boarding, and near-level platforms. The alignment will include side-running, dedicated business access and transit (BAT) lanes for just over 50% of the route, primarily between North River Drive and the intersection of North Division Street and Newport Highway (US 2). Additionally, protected bicycle and pedestrian facilities, such as two-way bicycle lanes, cycle tracks, or multi-use paths, will be incorporated along Ruby Street, with pedestrian and Americans with Disability Act (ADA) improvements throughout the corridor. The Project will also include a downtown bus layover and charging location. The Project alignment is depicted in **Figure A**.

The study area consists of the historic and archaeological resources Area of Potential Effects (APE) for the Project, which includes the construction limits and a one-tax-parcel buffer to account for visual, auditory, and vibration impacts on adjacent historic resources. The construction limits encompass excavation, new transit center construction, downtown charging/layover construction, grading, lane modifications, curb improvements, utilities, traffic signal modifications, station construction, staging areas, and geotechnical testing. The APE also includes any public park and recreational resources that could be affected by the Project.

In sections where Project activities like traffic striping and intersection improvements occur within the current road right of way, the APE is confined to this area because of the lack of potential effects on adjacent historic properties. However, the APE extends beyond the road right of way to include sidewalks and adjacent parcels where intersection upgrades, including sidewalk and ADA improvements, will take place. In areas where the final design and location of specific Project elements, such as the transit center and downtown charging/layover locations, have not been determined, the construction limits and APE are expanded to cover all design options. Future amendments may further extend the APE to include additional buffers to assess noise, vibration, and visual impacts on adjacent parcels once the final design and locations are finalized.

## ACQUISITIONS AND DISPLACEMENTS

The Project focuses on improving the efficiency and accessibility of the BRT system, which will require both temporary and permanent land acquisitions. These acquisitions are primarily needed for station improvements, signal modifications, and the development and construction of the transit center. Small-scale "sliver take" acquisitions will be necessary to enhance ADA accessibility, upgrade sidewalks, develop bicycle and pedestrian facilities, and implement utility improvements along the Project corridor. These acquisitions involve acquiring small portions of land adjacent to the existing right of way, which are crucial for ensuring pedestrian safety and accommodating the anticipated increase in foot traffic due

to the BRT Project. The utility upgrades and relocations will also require minor land acquisitions to maintain and enhance utility services.

The anticipated impacts of these acquisitions are minimal. The small portions of land being acquired are not expected to significantly affect the overall use or value of the affected properties. Property owners will receive fair compensation based on the value of the acquired land. Construction activities related to sidewalk and utility improvements may cause temporary disruptions, including noise, dust, and restricted access, but these impacts will be short-term. Mitigation measures, such as best management practices, careful planning, and ongoing communication with affected property owners, will be implemented to minimize any inconvenience. All acquisitions are expected to affect only the land itself, with no impact on existing structures.

Additionally, temporary construction easements may be needed to facilitate construction of the project and the installation of power and communication lines to stations and traffic signals. The need for these easements will be determined during the formal design phase of the Project. Overall, the Project is expected to have minimal long-term adverse effects on property owners or the community.

## SECTION 4(F)

The purpose of this section is to discuss any adverse impacts on properties that are regulated by Section 4(f) of the DOT Act of 1966. Section 4(f) prohibits the U.S. DOT agencies, including the 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.

There are two Section 4(f) properties adjacent to the Project alignment. The Project would be adjacent to at least two parks, Franklin Park and B. A. Clark Park. While there would be property impacts to the Franklin and B.A. Clark Parks, which are Section 4(f) recreational resources, the impact would be minor. The City of Spokane Parks & Recreation Department owns and manages both parks.

The use of a Section 4(f) property cannot be approved unless a determination is made that the use of the property will have a de minimis impact on the property or there is no feasible and prudent avoidance alternative to using the property. A de minimis impact determination must include sufficient supporting documentation to demonstrate that:

- The impacts, after avoidance, minimization, mitigation, or enhancement measures are taken into account, are de minimis as defined in 23 CFR 774.17;
- The Project would not “adversely affect the activities, features, and attributes” of a 4(f) resource;
- The coordination required by 23 CFR 774.5(b) was completed.

For public parks or recreation properties, a de minimis impact finding requires written concurrence from the agency with jurisdiction over the property, which is the City of Spokane Parks and Recreation Department. When an agency makes a de minimis determination, the agency is not required to analyze avoidance alternatives for that Section 4(f) property (23 CFR 774.17) and an individual Section 4(f) evaluation is not required. **Figure B-1** through **Figure B-7** provide a desktop review of Section 4(f) properties along the Project alignment.

## B.A. Clark Park

B.A. Clark Park, located at 3922 North Normandie Street on the west side of North Division Street between East Lacrosse Avenue and East Empire Avenue, will be affected by the Division BRT Project. A new transit stop is proposed in the right of way near park property along North Division Street. The Project will require a temporary construction easement of approximately 297 square feet and a permanent right of way acquisition from the park property totaling 160 square feet (see **Figure C**).

B.A. Clark Park is currently used for both active and passive recreation, including organized sports. Key features include a playground, baseball/softball fields, a picnic shelter, a jogging/walking path, and restrooms.

Locating a new transit stop within the park would constitute a Section 4(f) use. However, the impact would be minimal, and the park could continue to provide the recreational opportunities it presently offers, though with temporarily modified access during construction. None of the key features identified would be affected by the new transit stop, either physically or functionally. The small portion of the park that would be transferred to transportation use would not adversely affect the activities, features, and attributes of the park. The area to be acquired already includes a sidewalk and lies within only a small portion of the park in an area that is not developed for a specific use. It is adjacent to a busy street, sits outside a partially fenced area that separates it from the key park features, and would not limit access to the park. It may enhance — or at least maintain — existing access through public transportation.

## Franklin Park

Franklin Park is located at 302 West Queen Avenue on the west side of North Division Street, between West Nebraska Avenue and Queen Avenue. The Franklin Park Sports Complex, located in Franklin Park, is home to a five-plex softball complex, soccer fields, and a spacious green expanse with a picnic pavilion and playground.

The Division BRT Project is proposing a minor temporary construction easement needed to construct Station 19. The construction easement consists of approximately 32 square feet along North Division Street for staging equipment (**Figure D**). STA proposes that temporary impacts to Franklin Park during construction would not constitute a use because the occupancy would be relatively short in duration, the work would temporarily occupy a small

area within the park, and construction activities would not interfere with access to the recreation activities within the park.

Based on this analysis, STA recommends that the Project would result in a de minimis permanent use of B.A. Clark Park and would not be considered a use of Franklin Park because neither would adversely affect recreational activities or alter any significant features or attributes of the parks.

## Historic Resources

Pursuant to Section 106 of the National Historic Preservation Act, STA initiated identification and evaluation of historic properties within the APE for the Division BRT Project. A cultural resources survey and assessment was conducted by Parametrix in May 2025, consistent with Washington State Department of Archaeology and Historic Preservation (DAHP) and FTA guidelines.

The survey identified a total of 125 built environment resources within the APE. Of these, 109 were formally evaluated, including 31 previously unrecorded resources, properties lacking prior determinations of eligibility, and those with outdated eligibility assessments. The evaluation concluded that 15 properties are individually eligible for listing in the National Register of Historic Places (NRHP), and 94 properties are not eligible. Eligible resources include both previously known properties and newly recommended eligible buildings, such as the Dunkin Donuts building, Kinney Shoes, Hotel Division, and Paulsen Medical and Dental Building. Two segments of the Northern Pacific and Union Pacific railways, which were previously considered eligible, are now recommended not eligible due to loss of historic integrity. The APE also overlaps with three NRHP-listed historic districts:

- Desmet Avenue Historic District
- East Downtown Historic District
- West Downtown Historic Transportation Corridor

Within these districts, 21 resources are contributing elements and two are previously determined noncontributing. No additional resources outside these districts are recommended as contributing to new or expanded historic districts. In addition, the Spokane River District, listed in the Washington Heritage Register, intersects the Project area.

One previously recorded archaeological site, Site 45SP10, associated with the 1877 Indian Council, is located within the APE. However, it lacks physical integrity due to construction of the Washington Street Bridge and BNSF grade separation. No Project activities or ground disturbance are proposed in this area, and no effects to the site are anticipated. Archaeological sensitivity across the broader APE was found to be generally low, except for two areas of elevated sensitivity: the area between Francis Avenue and Whitworth Drive and the proposed Mead Transit Center. Geotechnical testing confirmed the unlikely presence of archaeological resources within the APE, and no cultural materials were encountered.

However, due to the Mead Transit Center site's high potential for both buried and precontact resources, archaeological monitoring is recommended during initial ground disturbance at that location.

**Avoidance, Minimization, and Use Determination**

The Division BRT Project was designed to avoid physical use of all Section 4(f)-eligible historic properties, including individually eligible or listed properties and contributing elements of NRHP-listed districts. The Project does not require the acquisition of land from, nor will it construct permanent infrastructure on, any historic site. In accordance with Section 106, Parametrix recommends a finding of No Adverse Effect for the undertaking. The cultural resources report documenting these findings will be submitted to DAHP for their review and concurrence.

Because there would be no permanent incorporation or impairment of historic features or setting of any historic Section 4(f) properties, no Section 4(f) use of historic sites will occur. Documentation supporting these findings is available in the Cultural Resources Assessment Report included in Attachment A.

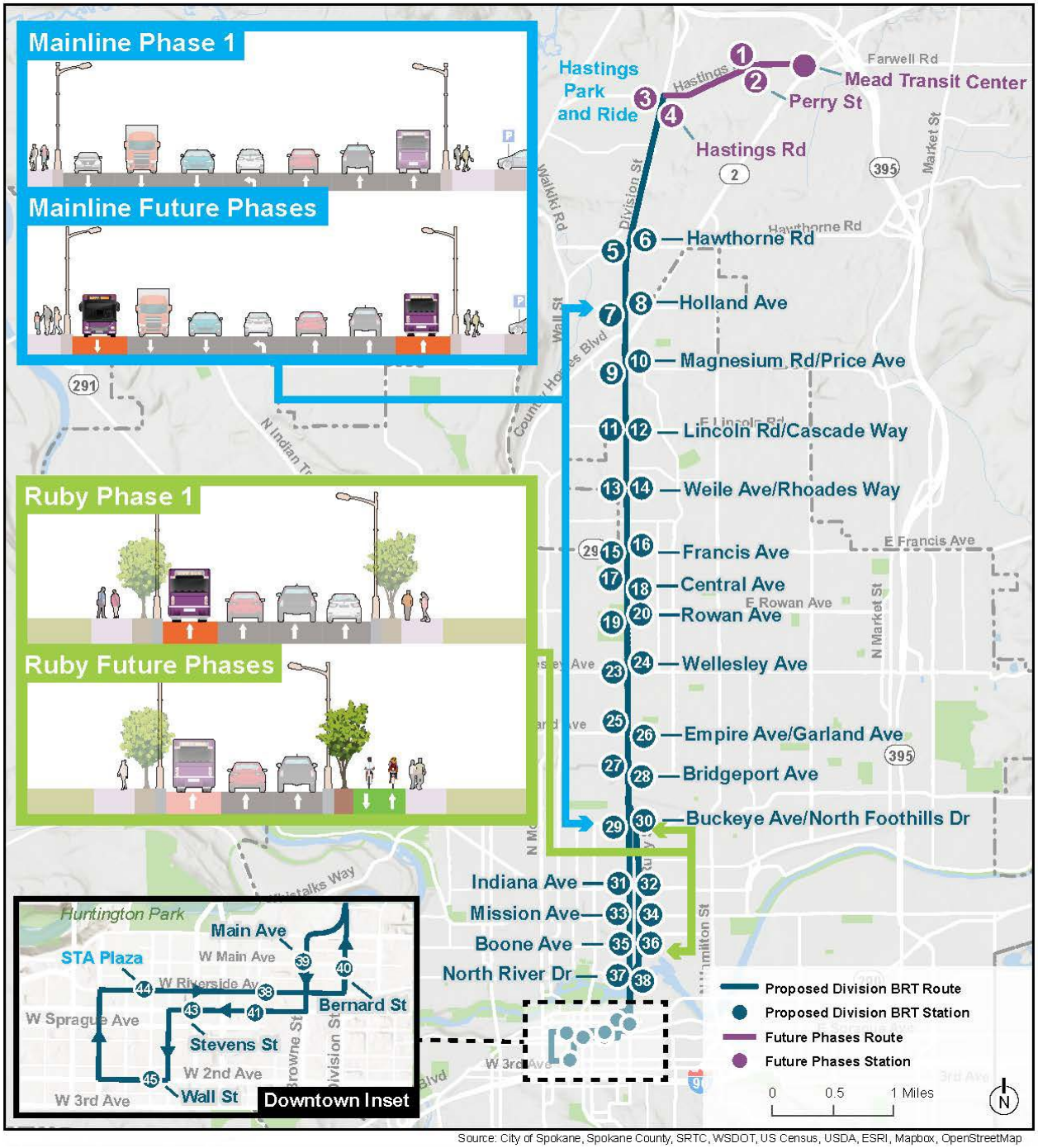
## SECTION 6(F)

This section addresses potential adverse impacts on properties protected under Section 6(f) of the Land and Water Conservation Fund Act of 1965. Section 6(f) requires coordination with the National Park Service when land or facilities acquired with LWCF funds are proposed for conversion to nonrecreational use. The only Section 6(f) resource in proximity to the Project is a 2024 playground-equipment-repair project completed at B.A. Clark Park. However, because the playground is not located near Division Street or the Project area, it would not be affected.

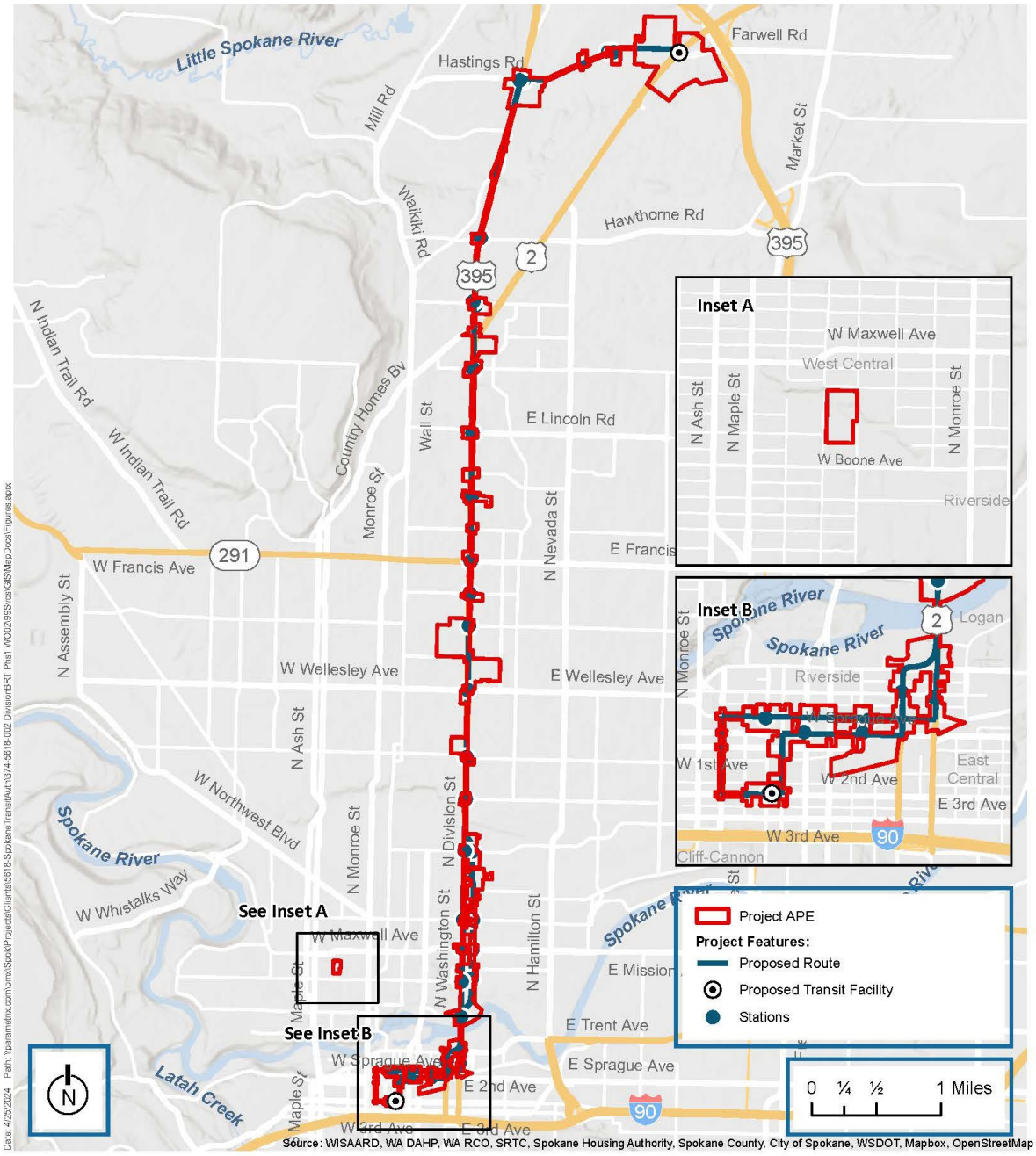
## CONCLUSION

A desktop review indicates that the proposed Division Street BRT Project is expected to have minimal impacts related to property acquisitions, displacements, and Section 4(f)/6(f) resources. Given the predominantly urban and developed nature of the study area, potential effects are anticipated to be minor. The Project is designed to remain within the existing right of way to the greatest extent feasible, with the intent of avoiding impacts to Section 4(f)/6(f) resources. Any property acquisitions are expected to consist of minor sliver takes and are not anticipated to result in significant displacements or changes to existing land uses.

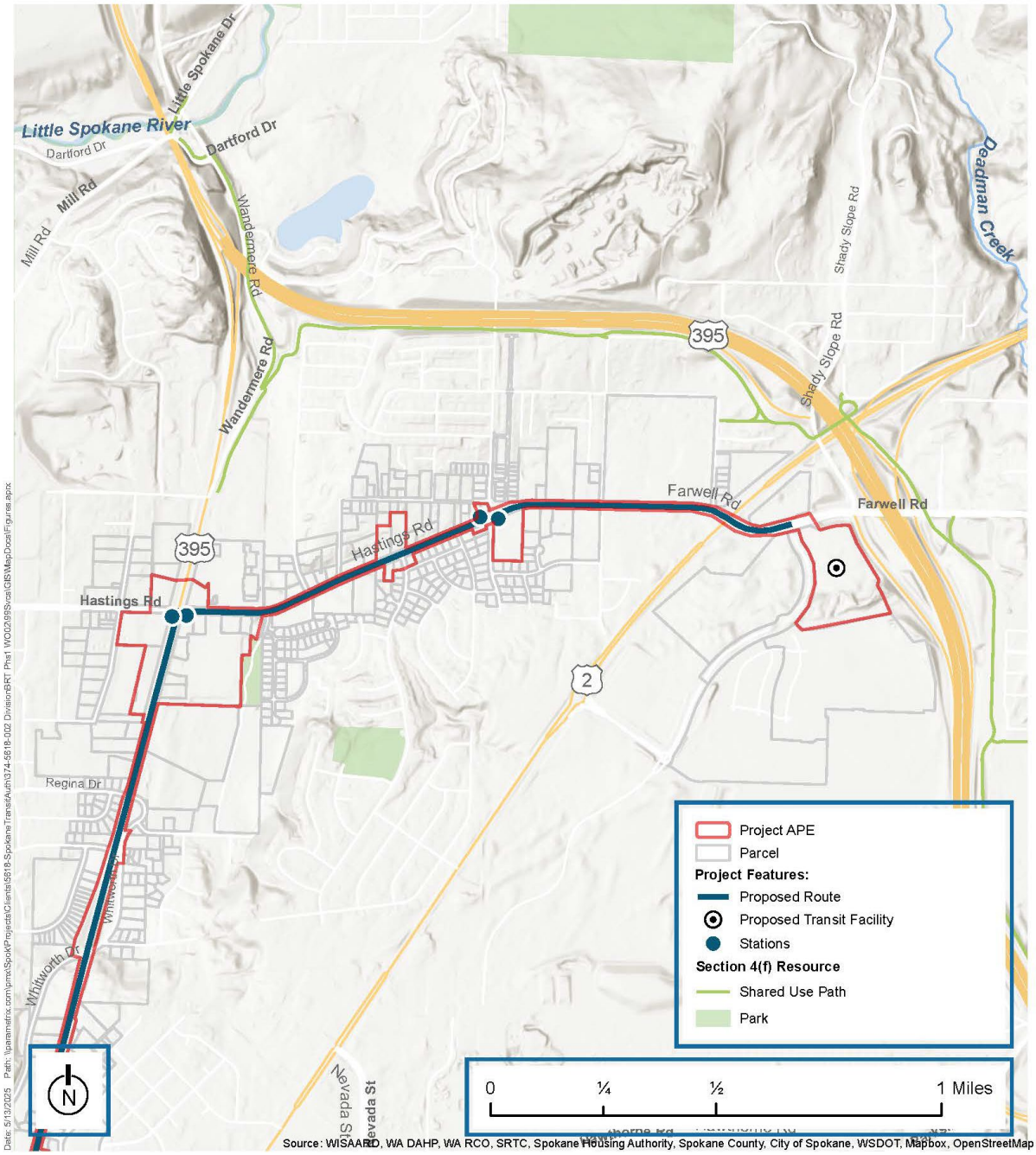
## Figure A. Project Alignment and Station Location Map



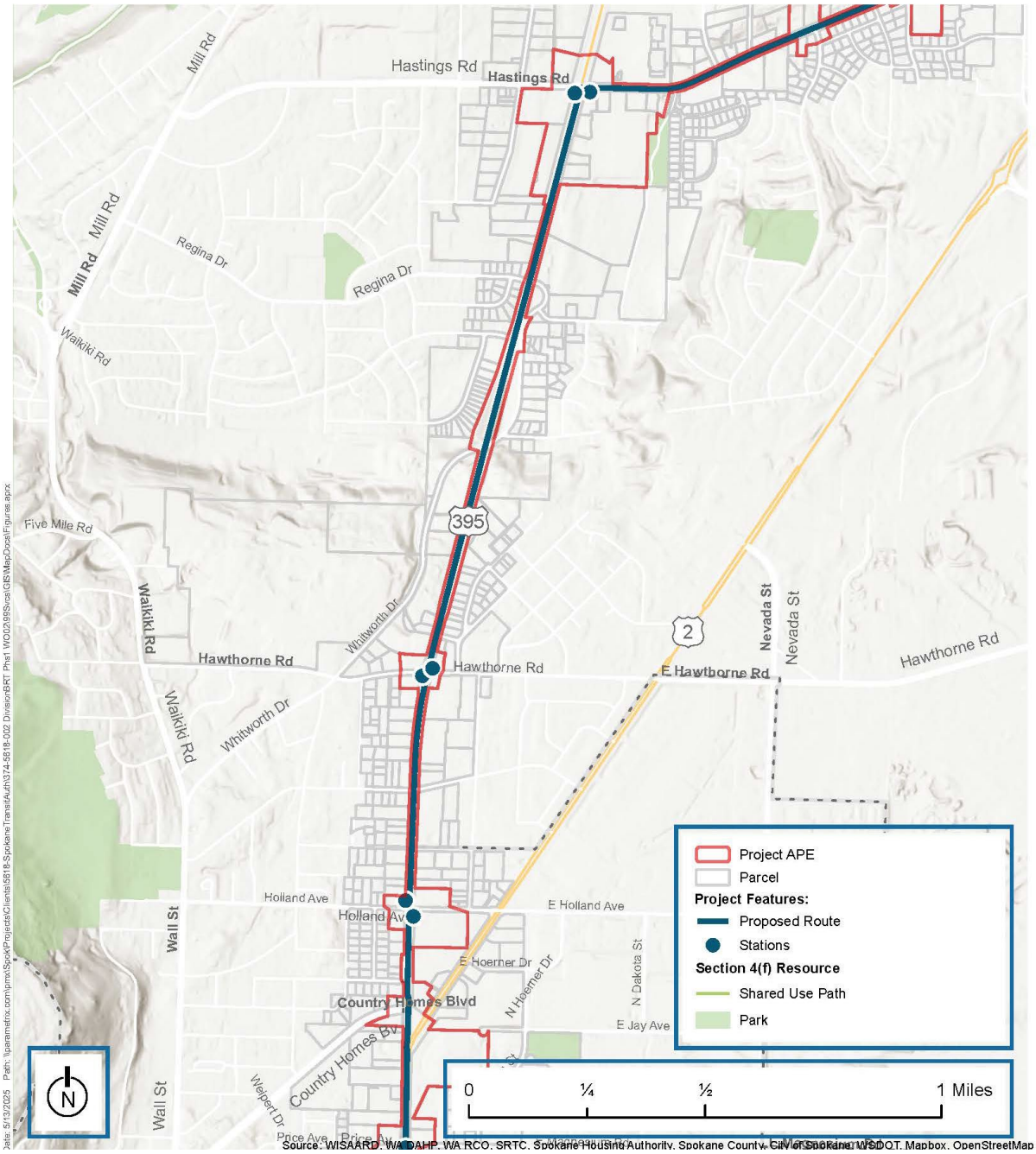
## Figure B-1. APE Alignment Map



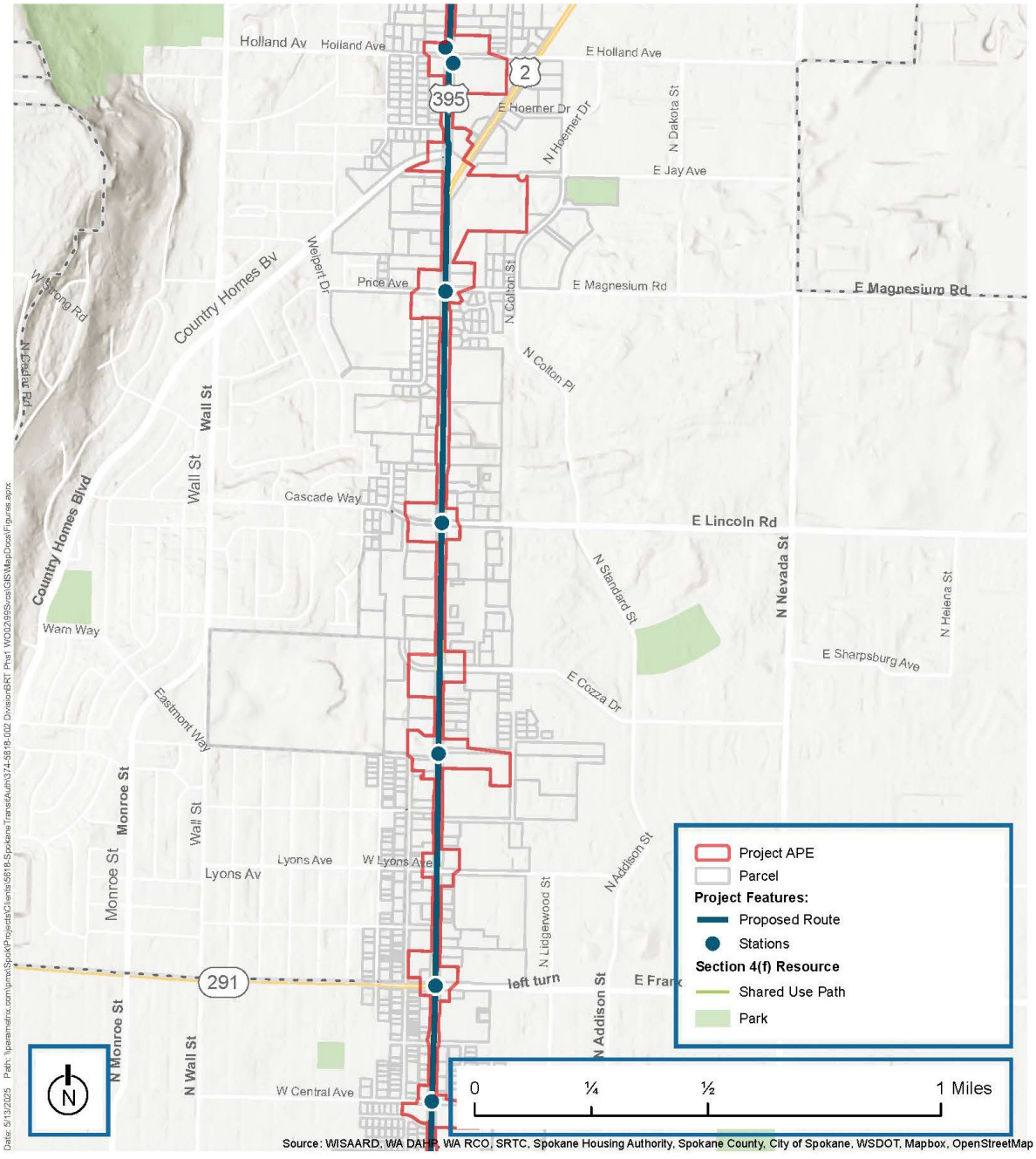
## Figure B-2. North Portion of the APE, North Section



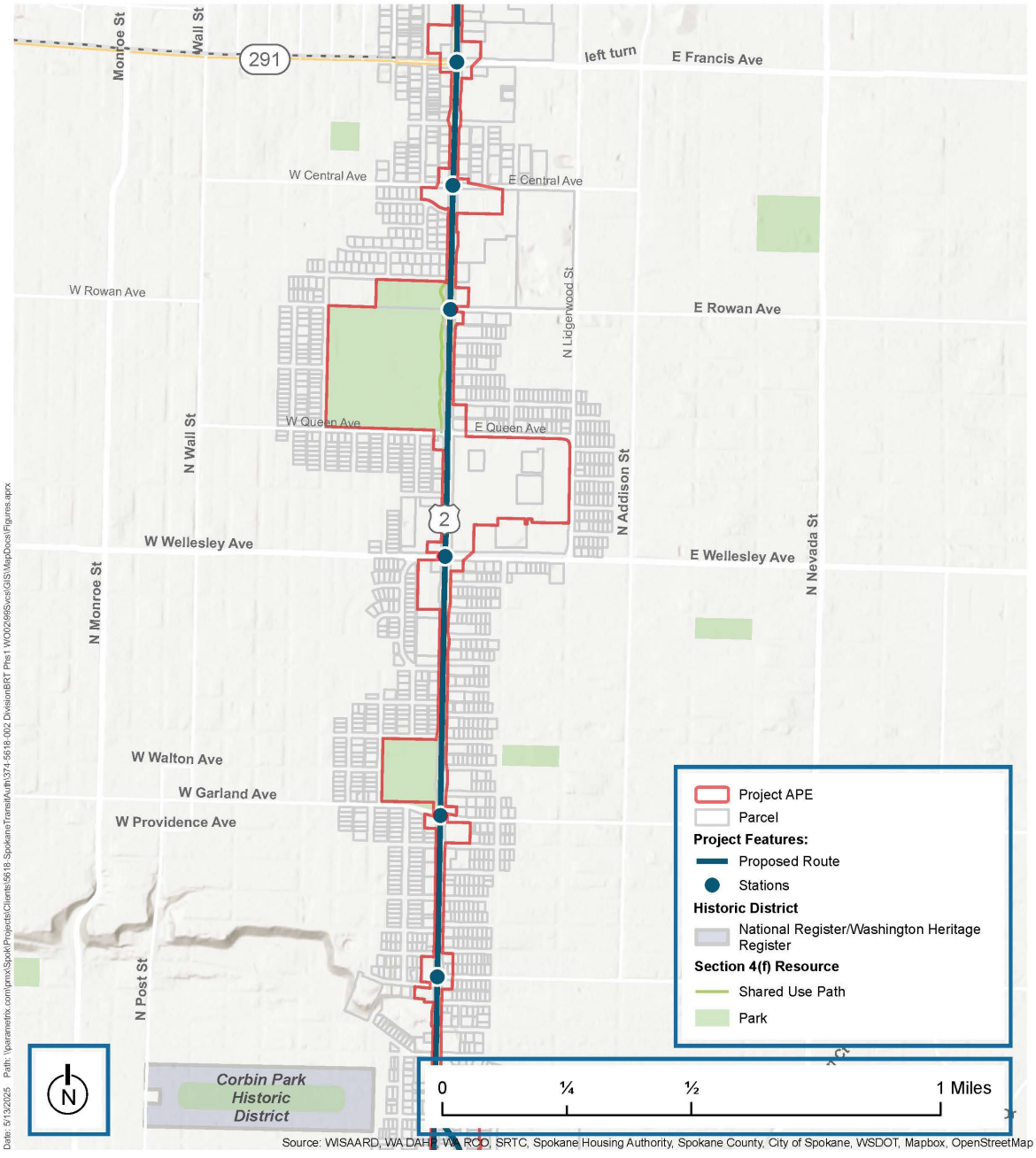
## Figure B-3. North Portion of the APE, South Section



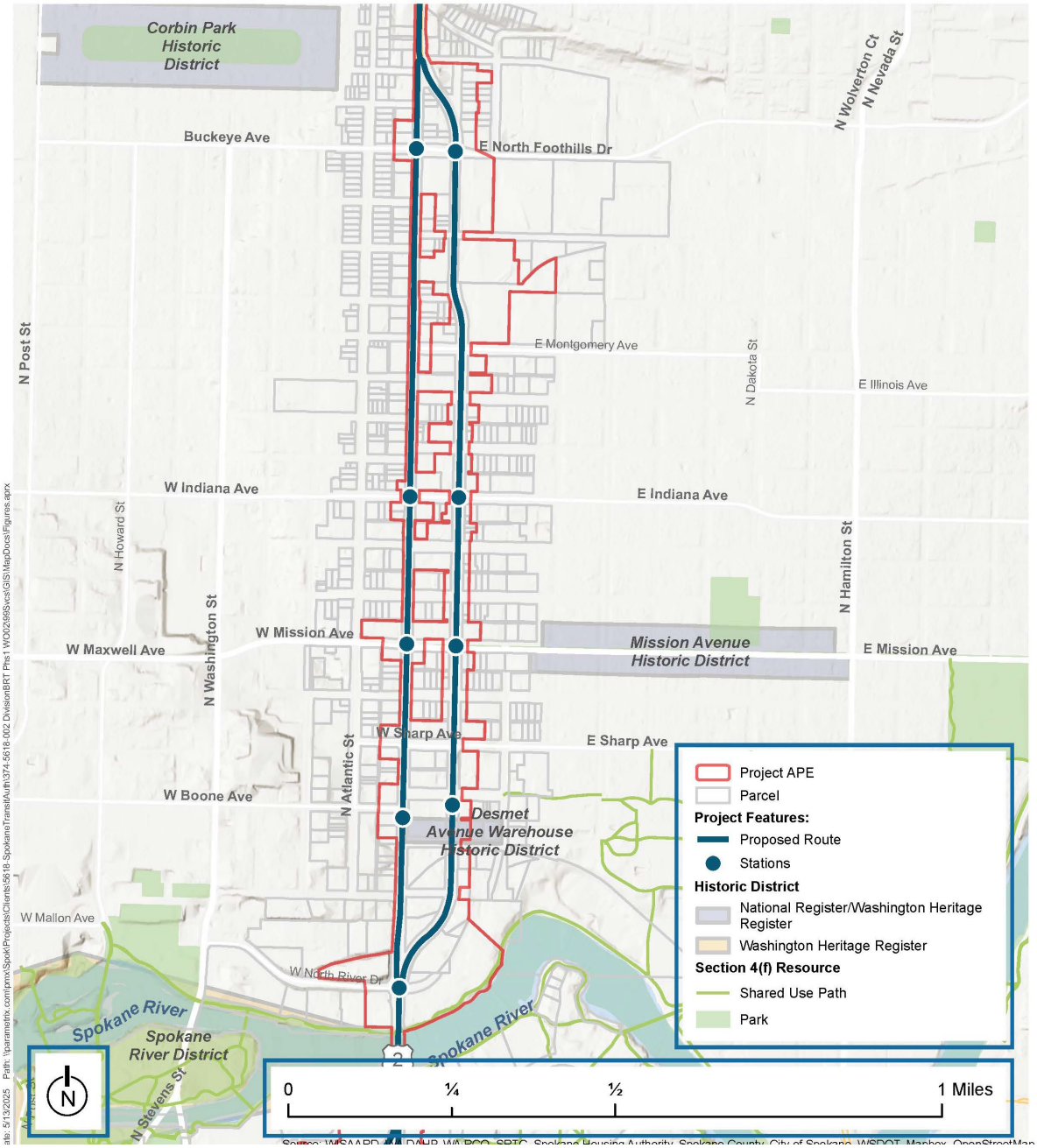
## Figure B-4. Mainline Portion of the APE, North



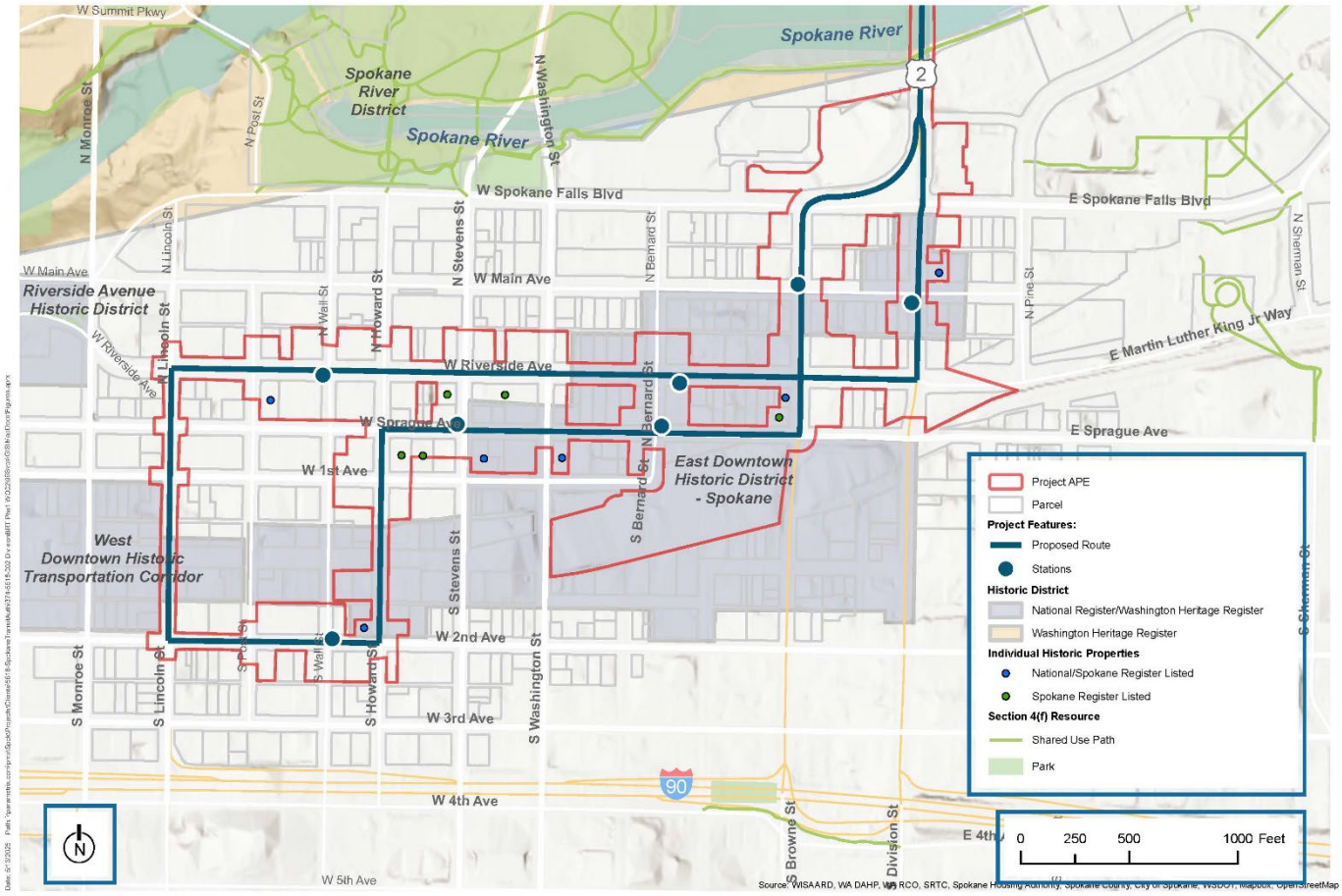
## Figure B-5. Mainline Portion of the APE, Middle Section



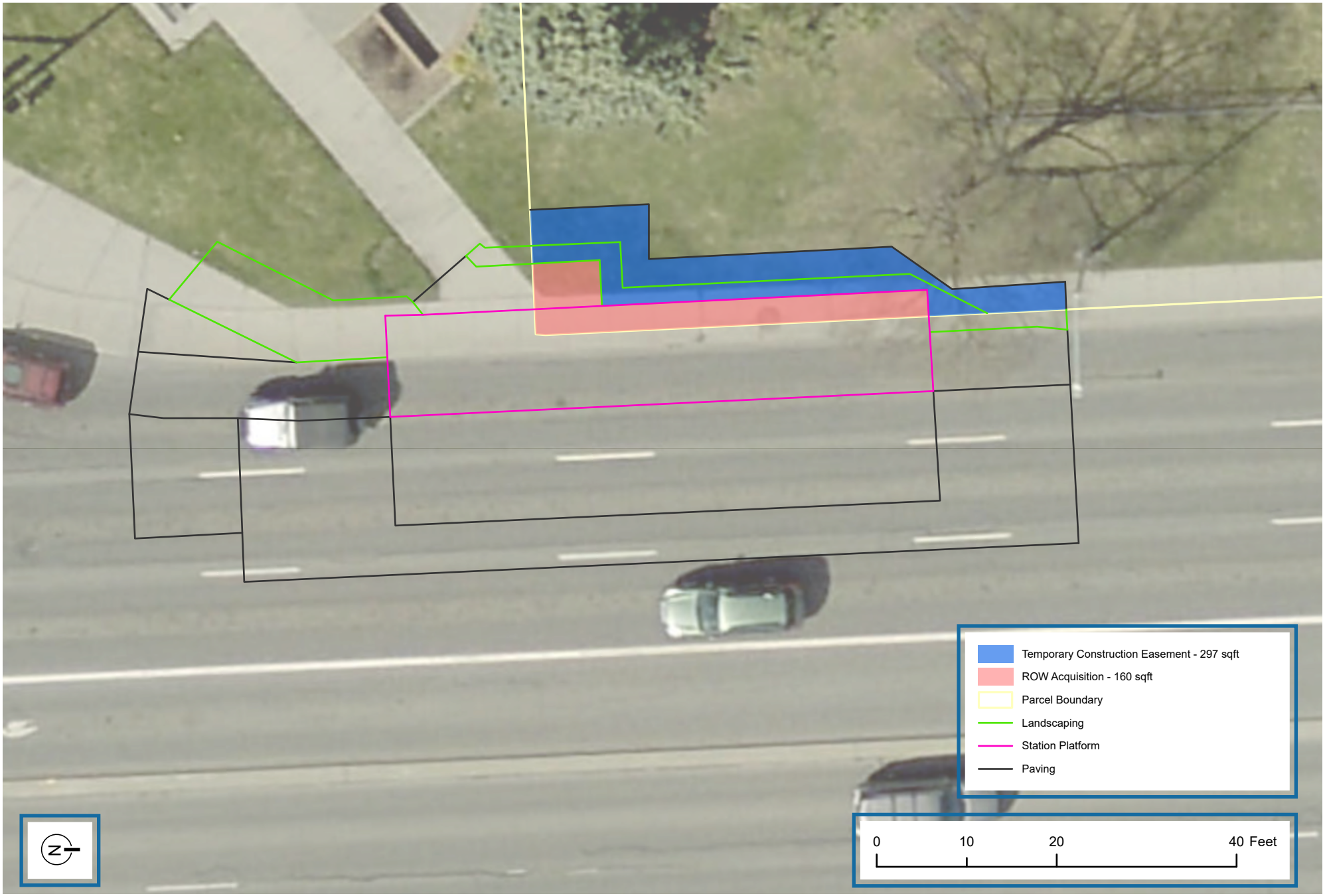
## Figure B-6. Mainline Portion of the APE, South Section



## Figure B-7. South Portion of the APE

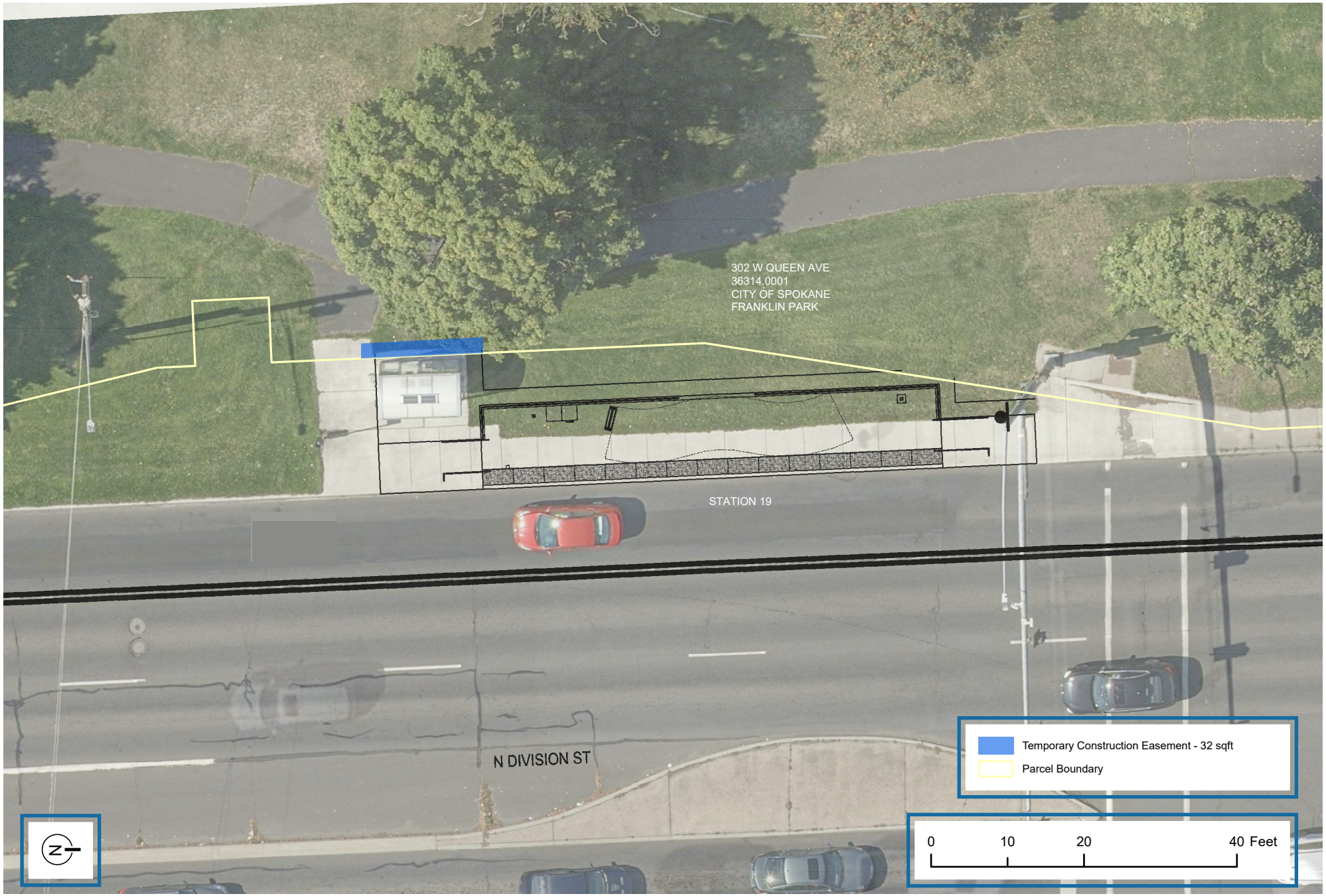


# Figure C:
# Acquisitions - Station 25




Date: 6/24/2026 Path: U:\Spok\Projects\Clients\5618-SpokaneTransitAuth\374-5618-002 DivisionBRT Phs1 WO02\99Svcs\GIS\MapDocs\Figures.aprx

# Figure D:
# Acquisitions - Station 19




Date: 6/4/2025 Path: \\parametrix.com\pmx\Spok\Projects\Clients\5618-SpokaneTransitAuth\374-5618-002 DivisionBRT Phs1 WO02\99Svcs\GIS\MapDocs\Figures.aprx