City of Spokane PARKS & RECREATION

August 31, 2026

Thomas Bonetti
Environmental Protection Specialist, Volpe Center
US Department of Transportation
300 Westgate Center Drive, Hadley, MA 01035

Mr. Bonetti,

The Spokane Transit Authority (STA), in coordination with the Federal Transit Administration (FTA), is proposing to construct the Division Street Bus Rapid Transit (BRT) Project (Project). The 10-mile-long corridor project is generally located along Division Street (U.S. Highway 2 and US 395) in the City of Spokane and parts of unincorporated 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.

The City of Spokane Parks & Recreation Department owns and maintains two parks along Division Street that are adjacent to improvements being made as part of the Project to upgrade and replace the existing Route 25 with BRT service, including new stations and roadway modifications. Franklin Park, located at 302 West Queen Avenue and B.A. Clark Park, located at 3922 North Normandie Street, both have existing STA bus stops adjacent to the parks that will be upgraded to BRT stations.

Under the Section 4(f) requirements, FTA cannot approve a transportation project that requires the use of any publicly owned land from a significant public park, recreation area, or wildlife and waterfowl refuge, or any land from a significant historic site, unless a determination is made that:

1. There is no feasible and prudent alternative to using the property; and
2. The project includes all possible planning to minimize harm to the property resulting from the use; or
3. The use will have no more than a *de minimis* impact on the resource. A *de minimis* impact means a project will have no adverse effect on the activities, features, and attributes of the resource after consideration of any impact avoidance, minimization, and mitigation or enhancement measures.

The improvements to the bus stop at B.A. Clark Park are proposed in the right-of-way near park property along North Division Street. The Project will require a temporary construction easement of approximately 118 square feet and a permanent right-of-way acquisition totaling 380 square feet. This action will require construction accommodations and will need to be approved by the Park Board Lands Committee. The improvements to the bus stop at Franklin Park will require a temporary construction easement of approximately 32 square feet for a staging area; however, the action would not constitute a use because the occupancy would be relatively short in duration, minor in scale, and construction activities would not interfere with use or access to the recreation activities within the park. The action can be completed administratively and can be executed by the Director of Parks and Recreation.

FTA intends to make a Section 4(f) *de minimis* impact determination on the impacts to the B.A. Clark Park resource resulting from the Project. Because the park is managed and owned by the City of Spokane Parks & Recreation Department, FTA requests this department's written concurrence with this determination pursuant to 23 CFR Part 774.5(b)(2). This written concurrence will be included in the environmental documentation for the Project

I concur with the Federal Transit Administration that the proposed improvements at B.A. Clark Park will result in a *de minimis* permanent use of the park and will not adversely affect the activities, features, or attributes of the park. Likewise, the improvements at Franklin Park are temporary and do not constitute a Section 4(f) use.

If you have any question, or would like to discuss further, please contact me at gjones@spokanecity.org.

Sincerely,



Garrett Jones
Director of Parks and Recreation