



State Environmental Policy Act

Determination of Nonsignificance

Adoption of Existing Document

Date of Issuance: 10/18/2026

Description of current proposal: The Division Street Bus Rapid Transit (BRT) project (project) will upgrade the existing Route 25 corridor into a bus rapid transit (BRT) line extending approximately 10 miles from downtown Spokane to the future Mead Transit Center near the intersection of U.S. Highway (US) 395 and Farwell Road. The project is intended to improve mobility, reduce travel times, and provide reliable, frequent transit service along one of Spokane's highest-ridership corridors. The corridor connects major employment centers, healthcare facilities, educational institutions, and residential neighborhoods and supports regional transportation goals identified in Spokane Transit Authority's (STA's) Connect Spokane plan. The project includes construction of approximately 43 BRT stations, roadway and operational improvements, procurement of 60-foot zero-emission buses, and development of the Mead Transit Center at the northern terminus. Station amenities will include raised platforms, shelters, lighting, seating, real-time passenger information displays, and off-board fare collection to improve boarding efficiency and reduce dwell time. Corridor improvements include business access and transit lanes, transit signal priority at intersections, upgraded pedestrian crossings, ADA-compliant curb ramps, and bicycle and pedestrian enhancements along portions of the corridor. Supporting infrastructure includes bus-charging facilities, layover areas, and operational improvements at STA's Boone Northwest Garage. Most project improvements will occur within the existing transportation corridor along Division Street, US 2 / US 395, and Ruby Street within the city of Spokane and portions of unincorporated Spokane County. Project construction is anticipated to begin following completion of final design and environmental approvals, with implementation occurring in phases through a minimum operable segment (MOS) approach. Construction of the initial MOS is anticipated to begin in 2028 and be completed in 2031.

Proponent: Spokane Transit Authority

Location of current proposal: The project is located in the City of Spokane and Spokane County, Washington. The 10-mile corridor begins at the future Mead Transit Center in the vicinity of the intersection of US 395 and Farwell Road and continues west along Farwell Road / Hastings Road

where it intersects Division Street. The corridor continues southbound along Division Street to the southern terminus in downtown Spokane at 2nd Avenue near Wall Street and Howard Street. This segment includes a couplet (two, one-way streets) along Division Street and Ruby Street between North River Drive and Cleveland Avenue. The project also includes improvements to the Boone Northwest Garage located at 1224 N Cedar Street, Spokane, Washington 99201, which is located west of the Division Street corridor at the STA campus.

Title of document being adopted: Division Street BRT Project National Environmental Policy Act (NEPA) Documented Categorical Exclusion (DCE) Worksheet

Agency that prepared document being adopted: Spokane Transit Authority

Date adopted document was prepared: 3/26/2026

Description of document (or portion) being adopted: Division Street BRT Project NEPA DCE Worksheet, in its entirety including all supporting appendices

If the document being adopted has been challenged ([WAC 197-11-630](#)), please describe: No appeals have been filed.

The document is available to be read at: Visit <https://www.spokanetransit.com/public-notices/>. An electronic or physical copy is available upon request. Relevant supporting documents are also available upon request.

STA has identified and adopted this document as appropriate for this proposal after independent review. The document meets our environmental review needs for the current proposal and will accompany the proposal to the decision makers.

The lead agency for this proposal has determined that it will not have a probable significant adverse impact on the environment. An Environmental Impact Statement (EIS) is not required under the Revised Code of Washington [43.21C.030\(2\)\(c\)](#). This determination is based on the following findings and conclusions: This proposal does not result in significant impacts, and avoidance, minimization, and mitigation measures have been identified that address potential impacts during construction and operation of the project.

Name of agency adopting document: Spokane Transit Authority

Contact person, if other than responsible official: See Responsible Official below.

Phone: [Enter phone number of contact person]

Email: [Enter email of contact person]

☐ There is no comment period for this DNS Adoption.

☐ This DNS Adoption is issued after using the optional process in WAC [197-11-355](#). There is no further comment period on this DNS Adoption.

☒ This DNS Adoption is issued under WAC [197-11-340\(2\)](#); the lead agency will not act on this proposal for 14 days from the date of issuance. **Comments regarding this DNS must be submitted no later than: 5 p.m. on November 2, 2026.**

Responsible Official: Brian Jennings

Position/Title: Director of Community Development

Address: 1230 W. Boone Ave., Spokane, Washington 99201

Phone: 509-344-1862

Email: bjennings@spokanetransit.com

Signature:

X 
Responsible Official

Signature Date: 10/16/2026

FEDERAL TRANSIT ADMINISTRATION CATEGORICAL EXCLUSION WORKSHEET

Purpose: To assist FTA project sponsors in providing sufficient documentation to support a categorical exclusion (CE) determination for certain “c-list” or “d-list” construction projects in compliance with the National Environmental Policy Act (NEPA) and FTA’s environmental regulations ([23 CFR § 771](#)), and to demonstrate compliance with other environmental requirements, as applicable. Small construction projects (e.g., bus shelters) and non-construction projects that qualify for a c-list CE are **exempt from this worksheet**; instead, the project sponsor will submit a sufficient project description to FTA via email or FTA’s grant management software, the Transit Award Management System ([TrAMS](#)). **Project sponsors should discuss whether to complete this worksheet with FTA Regional staff prior to assuming NEPA class of action.**

For all projects, [property acquisition](#) and project construction may not begin until FTA issues a CE determination or approval of this document in writing (Sec. VI). Populate Project information in Sec. I, below. For Sec. II through V, follow the provided instructions, then select and populate the applicable box/text field.

I. Project Information	
Project Sponsor and Contact Information Name: Don Skillingstad Title: Senior Project Manager, STA Organization Name: Spokane Transit Authority (STA) Phone Number: Office: (509) 344-1869 Email: dskillingstad@spokanetransit.com	State Transportation Improvement Program (STIP)/Transportation Improvement Program (TIP) Item/Project ID Number (if available): WA-14717 STIP/TIP Approval Date (if available): 10/10/2024 Anticipated FTA Funding Source(s) FTA Small Starts
Project Title: Division Street Bus Rapid Transit Project	
Project Location and Zoning (physical address and maps depicting location; project boundary/footprint; land uses allowed under applicable zoning ordinances [2-3 sentences]): Spokane Transit Authority (STA) is proposing to upgrade its existing Route 25 with the 10-mile Division Street Bus Rapid Transit (BRT) project (Project), featuring 43 new stations, corridor-wide capital and service enhancements, and a new transit center in the vicinity of US 2 and Farwell Road. The system will operate using zero-emission buses to provide fast, dependable, and zero-emission transit service. Refer to Figure 1	
Property Acquisition (Describe if real property acquisition or easement is required; Describe temporary easement/construction staging, if applicable): Phase 1 of the BRT Project will require both permanent and temporary property acquisitions. Most are small-scale sliver takes needed for sidewalk upgrades, ADA-accessibility improvements, utility work, and station construction. These acquisitions typically involve only small portions of frontage land adjacent to existing right-of-way. Additional minor acquisitions throughout the corridor will accommodate improved	

Project Description (scope of work; age of structures/buildings involved; extent of ground disturbance; estimated start date and project duration):

STA proposes the Division Street BRT Project to upgrade the existing Route 25 corridor into a high-performance transit line extending approximately 10 miles from downtown Spokane to the future Mead Transit Center near the intersection of US 2 and Farwell Road. The Project is intended to improve mobility, reduce travel times, and provide reliable, frequent transit service along one of Spokane's highest-ridership corridors. The corridor connects major employment centers, healthcare facilities, educational institutions, and residential neighborhoods, and supports regional transportation goals identified in STA's Connect Spokane plan. The Project includes construction of approximately 43 BRT stations, roadway and operational improvements, procurement of 60-foot, zero-emission buses, and development of the Mead Transit Center at the northern terminus. Station amenities will include raised platforms, shelters, lighting, seating, real-time passenger information displays, and off-board fare collection to improve boarding efficiency and reduce dwell time. Corridor improvements include BAT lanes, transit signal priority at intersections, upgraded pedestrian crossings, ADA-compliant curb ramps, and bicycle and pedestrian

II. Categorical Exclusion Determination

The project is categorically excluded from further NEPA review under [23 CFR § 771.118](#):

Select one from 118(c) or 118(d):

[118\(c\)](#): Select from the drop down menu to the right

[118\(d\)](#): Select from the drop down menu to the right

☒ General exclusion under 118(d) (no specific activity category applies, but the project is exempt per the conditions of [23 CFR 771.118\(a\) and \(b\)](#)).

Per [23 CFR 771.118\(e\)](#), the project is categorically excluded per Federal Railroad Administration (FRA) categorical exclusion under [23 CFR 771.116](#) or Federal Highway Administration (FHWA) categorical exclusion under [23 CFR 771.117](#). List applicable categorical exclusion:

III. Evaluation of Potential Reasonably Foreseeable Environmental Effects

Visit the FTA [environmental resources information](#) webpage for a list of resource impact areas for additional information.

A. Natural and Physical Environment

A.1 Biological Resources

[FTA Standard Operating Procedure \(SOP\) No. 23](#) provides guidance on biological resources including compliance with the Endangered Species Act (ESA) of 1973 (16 U.S.C. § 1531-1544), Migratory Bird Treaty Act (16 U.S.C. § 703-712), Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c), Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. § 1801 et seq.), and Marine Mammal Protection Act of 1972 (16 U.S.C. § 1361-1423h).

Select and populate the following prompts and attach supporting documentation, as applicable. Project sponsors may also attach supporting information from ESA consultations.

Biological Resources, continued

- ✓ The project will have no effect on listed, threatened, endangered, proposed, or candidate species; designated [critical habitat](#), [essential fish habitat](#); or other ecologically sensitive areas or marine mammals.

Species analyzed and rationale for “no effect” determination:

A review of the U.S. Fish and Wildlife Service Information for Planning and Consultation (IPaC) database and National Marine Fisheries Service records identified three federally listed or proposed species with potential to occur in Spokane County: yellow-billed cuckoo (*Coccyzus americanus*), monarch butterfly (*Danaus plexippus*), and Suckley's cuckoo

- The project may affect but is not likely to adversely affect listed, threatened, endangered, proposed, or candidate species; adversely modify designated critical habitat; or adversely affect essential fish habitat or other ecologically sensitive areas. Species analyzed and rationale for determination:

Date of US Fish and Wildlife Service (USFWS) concurrence:

Date of National Marine Fisheries Service (NMFS) concurrence:

- The project may adversely affect or destroy habitat for listed, threatened, endangered, proposed, candidate species; may adversely modify designated critical habitat; may adversely affect essential fish habitat, or other ecologically sensitive areas; or affect marine mammals.

Identify the habitat or sensitive area and any project effects on them:

Species analyzed, effects, and rationale for determination:

Date of USFWS concurrence:

Date of NMFS concurrence:

Describe effects on any other wildlife and species of concern/habitat, as applicable (e.g., Tribal sensitive species/habitat concerns, migratory birds):

The Project corridor is located primarily within a heavily developed urban transportation corridor, consisting of existing roadway, sidewalks, and other previously disturbed areas. As a result, habitat suitable for wildlife species of concern is minimal. Nearly all portions of the corridor are not expected to provide suitable habitat for sensitive species, with limited undeveloped habitat present only near

A.2 Coastal Zones

- ☒ The project is not located near the Atlantic Ocean, Caribbean Sea, Gulf of America, Pacific Ocean, or Great Lakes or certain connected coastal waters.
- ☐ The project is located near the Atlantic Ocean, Caribbean Sea, Gulf of America, Pacific Ocean, or Great Lakes or certain connected coastal water but it is not located in or within the vicinity of a designated [coastal zone management area](#).
- ☐ The project is located near the Atlantic Ocean, Caribbean Sea, Gulf of America, Pacific Ocean, or Great Lakes or certain connected coastal waters and it is in or within the vicinity of a designated [coastal zone management area](#). Identify the applicable coastal plan and the project's consistency with that plan, and attach/enclose documentation of coordination with local coastal zone management agency:

A.3 Prime or Unique Farmlands

- ☒ The project does not involve [prime or unique lands](#) present on the [National Resources Conservation Service](#) (NRCS) map.
- ☐ The project involves prime or unique lands present on the NRCS map. Describe potential effects on these farmlands and any coordination with the U.S. Department of Agriculture NRCS. Attach documented coordination, if applicable:

A.4 Water Resources

[FTA's SOP 22 for Water Resources](#) provides guidance on identifying water resources and assessing project impacts. Select and populate the following prompts, as applicable.

Wetlands and Other Waters of the United States (WOTUS) / Clean Water Act Section 404 and 401 Compliance

- ☒ Wetlands or other waters of the U.S. are not present per review of the National Wetlands Inventory and site visit(s). Survey Date: Desktop review: May 2025
- ☐ Wetlands or other waters of the U.S. are present at the proposed project site, but they will not be impacted by the proposed project.
- ☐ Wetlands or other waters of the U.S. will be impacted by the discharge of dredged or fill material.

A.4 Water Resources, continued

Describe the nature and extent of such activities, including location and amount. Identify the type of Clean Water Act Section 404 permit required [Nationwide Permit; Regional General Permit, or Individual Permit]. Identify the Section 401 certification (and issuing authority) and any relevant mitigation measures that would be required for the project:

Clean Water Act Section 402: National Pollutant Discharge Elimination System Stormwater Permit

Use of a [Section 402](#) permit is:

- ☒ Not required. Less than one acre of ground disturbance would occur.
- ☐ Required; the project involves more than one acre of ground disturbance. Name the authority issuing the permit(s) and attach documentation, if available:

Navigable Waterways

- ☒ The proposed project would not cross or affect a [navigable waterway](#).
- ☐ The proposed project crosses or otherwise affects a [navigable waterway](#). Describe the nature of such effects and provide permit information under Section 9 or Section 10 of the Rivers and Harbors Act, as applicable:

Floodplains

Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map numbers and effective date (See [FEMA](#) Maps):

- ☒ The project is not located in a 100-year floodplain.
- ☐ The project is in floodplain that is not delineated or is within a 100-year floodplain. Describe how the project would impact the base flood elevation and results of coordination with the local floodplain manager. Attach concurrence/support letters, no-rise certification, etc.

Water Resources, continued

Sole-Source Aquifer

- ☐ The proposed project is not located near an EPA-designated [sole source aquifer](#) (SSA).
- ☒ The proposed project is located near an SSA. Describe the outcome of consultation with EPA and attach an SSA worksheet as applicable for the project region:

The U.S. Environmental Protection Agency (EPA) has reviewed and concurs that the proposed Project, with appropriate best management practices (BMPs) in place, will not have significant adverse impacts on the Spokane-Rathdrum Prairie Sole Source Aquifer. Therefore, federal funding for the project may proceed. Refer to Attachment O.

A.5 Air Quality

Air Quality Conformity

Review the [EPA Greenbook](#) to determine National Ambient Air Quality Standards (NAAQS) designations, classifications and nonattainment status for each of the following criteria pollutants; Carbon Monoxide (CO), Ozone (O3), Nitrogen Dioxide (NO2), Sulfur Dioxide (SO2), Particulate Matter (PM10 or PM2.5), Lead (Pb) and populate the following prompts.

The project is:

- ☐ Exempted from conformity analysis under [40 CFR 93.126](#)

Located in an:

- ☐ Attainment area
- ☒ Maintenance area for *(list criteria pollutants):*
Carbon Monoxide (CO).
- ☒ Non-attainment area for *(list criteria pollutants):*
Particulate Matter (PM10 or PM2.5).

Located in a Metropolitan Area and was included in an air quality conformity analysis and Transportation Improvement Program (TIP). Date of US Department of Transportation (USDOT) conformity finding:

10/10/2024.

Air Quality, continued

Hot Spot Analysis

Reference the [EPA PM Hot-Spot Analysis Frequently Asked Questions \(FAQs\)](#) located on the [EPA Project-Level Conformity Hot-Spot Analyses](#) site which provides examples of the types of projects that would and would not require a hot-spot analysis.

Construction emissions would:

- ☒ Not be substantial and would not require a hot spot analysis. Explain why the nature of the project will not result in an increase in traffic volumes or factors that would cause an increase in emissions:

The project qualifies for exemption under 40 CFR 93.126 because it involves transit improvements, including replacement of existing diesel bus service with zero-emission battery-electric buses, construction of stations, and minor roadway modifications. The Project will not increase vehicle miles traveled by internal combustion engines and will not

- ☐ Be substantial and require a hot-spot analysis. Describe project emissions and hot-spot findings:

Sensitive Receptors (e.g., residences, schools, hospitals, nursing homes)

- ☒ Construction diesel emissions are not substantial and are not adjacent to sensitive receptors. Attach evidence of this finding, as applicable.

- ☐ The project would involve substantial diesel emissions adjacent to sensitive receptors. Identify and describe sensitive receptors within the project area:

The air-quality analysis indicates that construction emissions will be temporary and minimized through required mitigation measures, including dust suppression, reduced idling, and appropriate equipment staging. Although the Project occurs within an urban corridor where sensitive receptors such as residences and community facilities are present,

A.6 Geology and Soils

- ☒ The project is not located in an area that would involve any specific construction considerations, including [fault lines](#), [fault zones](#), or an [active landslide area](#).
- ☐ The project is located in an area that would involve special construction considerations, but would comply with all relevant requirements (e.g., local building codes). Describe what special considerations have been incorporated into the project plan:

Please refer to the Geotechnical Report in Attachment J for details.

A.7 Hazardous Materials and Brownfields

Refer to FTA's SOP. No. 19 [Consideration of Contaminated Properties including Brownfields](#) for guidance on assessment and acquisition considerations. Indicate the presence of existing hazardous materials and proposed project components:

- ☐ No existing hazardous materials are present onsite. Attach supporting documentation, as applicable.
- ☒ Hazardous materials are present:
 - ☒ Aboveground or underground storage tanks; describe:

Numerous sites within and adjacent to the Project corridor are associated with current and former underground storage tanks (USTs), primarily related to gasoline service stations and automotive uses. Several sites include documented UST removal,
 - ☒ Lead-Based Paints/ Asbestos; describe:

Some properties within the corridor are listed in databases for asbestos and hazardous waste generation, typically associated with commercial or industrial uses; however, no specific widespread asbestos or lead-based paint concerns were
 - ☒ Other; describe:

Additional potential sources of contamination include former dry cleaners, automotive repair facilities, industrial sites, and reported spills, which may have resulted in localized soil or groundwater contamination. Over 1,000 database listings were

Describe the types of activities to be conducted involving hazardous materials (i.e., a structure will be modified or altered through the project):

Project activities include soil disturbance (excavation, trenching, and grading), utility installation, and station construction within an existing urban corridor. Contaminated soil or groundwater at locations near known or suspected contaminated sites may be encountered during these activities. If encountered, contaminated media will be managed

Summary of records review for hazardous materials:

A records review was conducted using federal, state, and local environmental databases, including Washington State Department of Ecology cleanup sites, UST/LUST databases, hazardous waste listings, spill reports, and Environmental Data Resources (EDR) reports. A total of 1,096 listed sites (plus 386 unmappable sites) were identified within the search area, with sites screened based on

Date of review: June 26, 2024

Populate the following prompts if a Phase I Environmental Site Assessment was conducted for applicable property acquisition.

Date completed: PH1:10/3/24; PH2: 2/13/25

Summary of results/findings:

Future Mead Transit Center: As part of the acquisition due diligence process for the Mead Transit Center property acquisition process, STA completed both Phase I and Phase II environmental site assessments (ESA) in accordance with American Society for Testing and Materials (ASTM) standards.

Phase 1 Recommendation:

Mitigation and Cleanup Measures: No hazardous material impacts were identified that require remediation. However, loose backfill along the former pipeline alignment was noted as unsuitable for structural support. STA will remove and recompact this material during construction to meet engineering and building code standards. The environmental due diligence concluded that

A.8 Transportation

Refer to the [FTA Transportation Impacts](#) web page for guidance and populate the following prompts.

Traffic/Parking

- ☐ The project would not temporarily or permanently increase traffic volumes or worsen the level of service, change local/regional circulation patterns, and would not result in the loss of parking spaces. Describe why the project would have no effects:

- ☒ The project would temporarily or permanently affect road traffic or parking demand. Describe potential effects to existing services, capacity constraints, and summarize the results of coordination with relevant transportation authorities. Attach a traffic analysis memo if one has been conducted.

Traffic analyses were completed for both the full Locally Preferred Alternative (LPA) and the Phase 1 Minimum Operable Segment (MOS). For the MOS, the traffic analysis found that implementation of BAT lanes along the Division/Ruby couplet would create a project impact at North Division Street and West Mission Avenue during the AM peak period, where

Transit/Rail

- ☐ The project would have no effects on transit or railway operations. Describe why the project would have no effects:

- ☒ The project would affect transit or railway service/operations. Describe potential effects to existing services, capacity constraints, and summarize the results of coordination with relevant transportation authorities.

The Project is intended to improve transit operations by converting existing Route 25 service to BRT with BAT lanes, transit signal priority, branded stations, raised platforms, and more frequent service. The Project will improve transit travel time, reliability, and multimodal connections, including connections to the proposed Mead Transit Center and

Bicycle/Pedestrian Facilities

- ☐ The project would have no effects on bicycle or pedestrian facilities. Describe why the project would have no effects:

Transportation, continued

- ☒ The project would affect bicycle or pedestrian facilities. Describe any potential effects to existing services, the duration of such changes, and summarize the results of coordination with relevant transportation authorities.

The Project includes improvements to bicycle and pedestrian facilities, particularly along Ruby Street, where the LPA includes a protected bikeway and the Project as a whole includes improved crossings, sidewalk connectivity, and reconstruction of ADA curb ramps. Nonmotorized improvements are intended to close sidewalk gaps, improve ADA

If there are any other potential impacts to systems used to transport goods and provide transportation services, describe them below.

The Project is not expected to result in substantial adverse impacts to freight movement or other transportation service systems beyond the traffic and curb space changes described above. The Project is expected to support overall corridor mobility by improving transit efficiency and reducing dependence on single-occupant vehicle travel over time.

A.9 Noise and Vibration

Refer to Sections 2, 4, and 6 of FTA's [Transit Noise and Vibration Impact Assessment](#) manual to identify potential noise and vibration impacts and the level of such impacts. Utilize the [FTA Noise Impact Assessment Spreadsheet](#), as applicable.

- ☐ No sensitive land uses (e.g., schools, hospitals, hotels, or residences) are located within the vicinity of the project area.
- ☒ Sensitive land uses are present and will experience temporary noise or vibration impacts due to construction activities. Describe temporary noise or vibration impacts, affected properties, and any measure, as applicable, to control or mitigate temporary impacts:

Sensitive land uses, including residences, schools, parks, and commercial uses, are located along the Project corridor. Construction activities such as excavation, paving, utility work, and station installation will generate temporary increases in noise and ground-borne vibration from equipment (e.g., backhoes, trucks, compactors). These impacts will be

- ☐ Sensitive land uses are present and will be impacted by the project. Summarize the results of the noise or vibration analysis (e.g., moderate impact), affected properties, and identify mitigation measures that would eliminate or reduce impact, if any. Attach a general noise or vibration assessment if applicable.

A.10 Utilities

Select and populate the following prompts, as applicable.

Name(s) of utility provider(s) present:

- ☐ Utility work is not anticipated.
- ☐ Utility work is not anticipated at this time, but it will be investigated during the design phase.
- ☒ Utility work is involved in the project. Describe the nature of the work (relocation, temporary service disruption), the type of entity performing the work (e.g., contractor, utility company), and how the affected customers would be notified.

The Project will require minor utility relocations and adjustments to accommodate station construction, roadway modifications, and installation of transit infrastructure. Utility work may include relocation of overhead and underground utilities, protection in place, and coordination for connections related to station amenities and charging infrastructure. Work

B. Human Environment

B.1 Historic Properties and Cultural Resources/Section 106 Compliance

Document compliance with Section 106 of the National Historic Preservation Act (NHPA) ([Refer to FTA's SOP No. 21 for Section 106 Process](#)). Select and populate the following prompts and attach supporting documentation, as applicable.

Refer to the Advisory Council on Historic Preservation's [web page for available program alternatives](#) (36 CFR § 800.14) that may be applicable to the project and populate the following prompt.

- ☒ There is no applicable program alternative to the project.
- ☐ A program alternative applies to the project. Identify the specific program alternative and provide documentation demonstrating compliance with its terms:

Historic Properties and Cultural Resources/Section 106 Compliance, continued

Presence of Historic Properties/NHPA Compliance

☐ No [National Register of Historic Places \(NRHP\)](#) properties or eligible properties are present in the project's area of potential effect (APE).

Records search/Survey data/document:

Date of FTA's finding of no historic properties affected:

State Historic Preservation Officer (SHPO)/Tribal Historic Preservation Officer (THPO) concurrence/no objection date:

☒ The project's APE has been surveyed and the following historic property/properties are located within the APE:

Records search/Survey data/document:

The Areas of Potential Effect (APE) were surveyed utilizing background records research, historic assessor records, field surveys, and evaluation of historic and archaeological resources conducted in accordance with Washington State

Historic site name(s):

The APE includes one previously recorded archaeological site, 45SP10 (location of the 1877 Indian Council), as well as overlapping portions of the Desmet Avenue Historic District, East Downtown Historic District, West Downtown Historic

NRHP status (listed, eligible, ineligible) and Criterion (A, B, C, D):

The cultural survey identified 125 individual resources in the APE. Of these, 6 are listed in the NRHP, 8 have been previously determined eligible for listing in the NRHP, 7 have been previously determined not eligible for listing in the NRHP, six

Briefly describe the nature of the effect and mitigation commitments, if applicable:

The Project is not anticipated to alter the historic integrity of the individually listed or eligible resources, contributing district resources of the Desmet Avenue Historic District, East Downtown Historic District, West Downtown Historic Transportation

FTA's Finding or Determination under Section 106:

☐ No adverse effect

☐ Adverse effect

SHPO/THPO concurrence date: Pending

Programmatic Agreement or Memoranda of Agreement execution date (for adverse effect) (Note: attach agreement):

B.2

Section 4(f) Requirements

See FTA's [SOP for Section 4\(f\) Evaluations](#) to determine Section 4(f) applicability. Select and populate the following prompts, as applicable.

- ☐ No properties protected by Section 4(f) are present.
- ☒ A public park or recreation area is present.
- ☐ A publicly owned wildlife or waterfowl refuge is present.
- ☒ A public or private historic site is present.

If any of the resources noted above are checked, describe these resources, including their location and ownership, and results of coordination with the owner of these resources:

Two Section 4(f) recreational resources are located adjacent to the Project corridor: B.A. Clark Park and Franklin Park, both owned and managed by the City of Spokane Parks and Recreation Department. There are also NRHP-listed and eligible historic districts and individual resources identified, which are listed in the Cultural Resources

- ☐ The project is exempt from Section 4(f) approval per [23 CFR 774.13\(a\)-\(c\)](#). Describe the applicable exception and attach supporting documentation, as applicable, including compliance with applicable conditions:

- ☐ There is temporary occupancy of land that is minimal; therefore, there is no "use" of land as defined in [23 CFR 774.13\(d\)](#). Attach documented agreement from the officials with jurisdiction (OWJs) including compliance with applicable conditions.

If a Section 4(f) exception does not apply, then determine if the project would result in use of a Section 4(f) property, attach appropriate evidence of coordination as applicable, and populate the following prompts:

- ☐ There is no permanent (direct) use of a Section 4(f) resource. Provide justification for this finding:

- ☐ *De minimis* impact (historic site). There is a "no effect" or "no adverse effect" determination on a historic site listed in or eligible for listing in the NRHP. Attach letters or concurrence from SHPO/THPO. Refer to documentation requirements at [23 CFR 774.7\(b\)](#) and coordination requirements at [23 CFR 774.5\(b\)](#).

Section 4(f) Requirements, continued

- ☒ *De minimis* impact (public parks, recreation areas, and wildlife and waterfowl refuges). Describe the use and provide justification. Attach public notice, comments received, if any, and concurrence from OWJs to support this finding per coordination requirements at [23 CFR 774.5\(b\)\(2\)](#).

The Project will result in a de minimis permanent use of B.A. Clark Park, including approximately 380 square feet of right-of-way acquisition and 118 square feet of temporary construction easement for a station near the park. These impacts occur in an area already used for sidewalk and transportation purposes and do not

- ☐ There is permanent (direct) use of a Section 4(f) resource that is not *de minimis*. Attach an Individual Section 4(f) evaluation and associated correspondence:

If the project would have a use of a Section 4(f) resource, review the [Nationwide Net Benefit Programmatic Evaluation](#) and the [Nationwide Historic Bridges Programmatic Evaluation](#) for additional efficiency options.

B.3 Section 6(f) Resources

Protections state that no property acquired or developed with assistance under [Section 6\(f\)](#) shall, without the approval of the Secretary, be converted to other than public outdoor recreation uses. Section 6(f) applies to outdoor recreational properties funded by the Land and Water Conservation Fund (LWCF). Review the [map of places funded by LWCF](#) and populate the following prompts, as applicable.

- ☒ The project does not involve land acquired or developed with LWCF grant money.
- ☐ Land acquired or developed with LWCF grant money is involved, but the project will not convert recreational areas to non-recreational uses. Describe the property:

- ☐ Land acquired or developed with LWCF grant money is involved and will be converted to non-recreational purposes. Describe the property and coordination/written approval from the National Park Service, and any applicable mitigation measures.

Attach supporting documentation of the LWCF funding (deed, agreement, 6(f) grant) for the affected property to this form.

B.4

Community Impacts

Community Cohesion/ Neighborhood Continuity

- ☒ No established communities or planned developments will be disrupted, and the project is consistent with applicable plans and goals. Describe the justification for this finding:

See below.

- ☐ The project would result in the disruption of an established community or planned development or is inconsistent with applicable plans and goals. Describe the affected community and potential disruption or inconsistency and any applicable mitigation measures:

[The following text applies to the character-limited box above] The Project is located within an existing urban transportation corridor and primarily involves improvements within the current roadway and right-of-way. The Project does not divide or physically isolate neighborhoods, and no residential or business

Permanent/Temporary Access

- ☐ The project would not result in permanent or temporary effects on access to services. Describe the justification for this finding:

- ☒ The project would have permanent or temporary effects on access to services (community organizations, healthcare centers, educational institutions, public services, etc.). Describe any potential effects to existing community services or their capacity and coordination with relevant service authorities as applicable.

Construction activities will result in temporary, localized disruptions to access along the corridor, including lane closures, detours, and restricted driveway or sidewalk access near work areas. These effects may temporarily affect access to residences, businesses, schools, healthcare facilities, and other community

Displacement(s)

- ☒ No residents, businesses or institutions (e.g., community centers, schools) will be relocated.

- ☐ The project requires relocation of residents, businesses, or institutions. Describe the number and type (residence, business, other) of relocations associated with the project:

Community Impacts, continued

Coordinate with the [Bureau of Indian Affairs](#) if the project involves tribal lands.

- ☒ No right-of-way action by the Bureau of Indian Affairs is required.
- ☐ Right-of-way action by the Bureau of Indian Affairs is required. Describe the affected tribal land and tribe:

B.5 Safety and Security (including Resilience)

Describe measures that would need to be taken and that have been included for the safe and secure operation of the project (e.g., pedestrian and traffic hazards, as well as user and employee security issues), as applicable (see [FTA's Transit Safety and Oversight webpage](#) for more information):

Safety improvements include dedicated BAT lanes, which reduce conflicts between buses and general traffic, and transit signal priority (TSP) to improve traffic flow and reduce congestion-related risks. Pedestrian safety will be enhanced through reconstructed ADA-compliant curb ramps, improved crosswalk visibility, pedestrian lighting, and upgraded

Identify measures involved in the project that will be taken to address extreme weather events, as applicable:

The Project incorporates resilience measures to address extreme weather and long-term reliability, including: stormwater management and drainage improvements to reduce flooding risks; use of durable materials and infrastructure designed for temperature and precipitation variability; reliable electrical and charging systems designed to meet current

C. Other

As applicable, describe impact areas and associated permits (e.g. wild and scenic rivers, [Section 408 permit](#)) not discussed above.

No impacts to wild and scenic rivers, Section 408 resources, or other federally protected systems are anticipated for the Project.

IV. Mitigation Measures, Project Commitments, and Permits

List mitigation measures and permits applicable to the project and identify responsible parties:

The Project will implement standard BMPs and commitments to avoid, minimize, and mitigate potential impacts. These include Construction: Dust control, erosion and sediment control, spill prevention, and proper material handling; Traffic and Access Management: Traffic-control plans, detours, and maintenance of access to residences, businesses, and

V. Submitted by: (name, title):

Don Skillingstad, Senior Project Manager, STA

Project Sponsor: STA

Date:

VI. FTA Concurrence:

Date:

VII. Attachments

Insert list of agency correspondence, location map(s), technical memos, site plans, renderings, etc.

List of Figures:

Figure 1: Project Vicinity and Location Maps

Figure 2a: Station Locations and Routing MOS

Figure 2b: Station Locations and Routing Future Phases

Figure 3: Bus Route Schedule

Figure 4: Mead Transit Center Concept Design

Figure 5: Station Types and Kit of Parts

Figure 6: Electric Bus Specifications

Attachment A: Project Description and Purpose and Need

Attachment B: Parking Study

Attachment C: Land Use Maps

Attachment D: Project Traffic Operation Technical Memorandum

Attachment E: MOS Traffic Operation Technical Memorandum

Attachment F: Air Quality Technical Report

Attachment G: Noise and Vibration Technical Report

Attachment H: Hazardous Materials Report

Attachment I: Mead Transit Center Property Phase I and II ESA

Attachment J: Geotechnical Report

Attachment K: Cultural Resources Report

Attachment L: Mead Transit Center Cultural Resources Addendum

Attachment M: Endangered Species Act, Letter of No Effect

Attachment N: Acquisitions and Section 4(f) Technical Memorandum

Attachment O: Sole Source Aquifer Checklist and Ecology Approval Letter

Attachment P: ROW Acquisitions Table



U.S. Department
of Transportation
**Federal Transit
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August 31, 2026

Karl Otterstrom
Chief Executive Officer
Spokane Transit Authority
1230 W. Boone Avenue
Spokane, WA 99201

**Subject: Spokane Transit - Division Street Bus Rapid Transit Project
National Environmental Policy Act
Categorical Exclusion Confirmation**

Dear Mr. Otterstrom:

The Federal Transit Administration (FTA) has reviewed the materials Spokane Transit submitted by e-mail October 5, 2023 through July 1, 2026, including an FTA Categorical Exclusion (CE) worksheet and supporting documentation describing the proposed Division Street Bus Rapid Transit (BRT) Project (Project) in Spokane, Washington.

FTA understands the Project would upgrade the existing Route 25 corridor into a high-performance transit line extending approximately 10 miles from downtown Spokane to the future Mead Transit Center near the intersection of US 2 and Farwell Road. The Project includes construction of approximately 43 BRT stations, roadway and operational improvements, procurement of 60-foot, zero-emission buses, and development of the Mead Transit Center at the northern terminus. Station amenities will include raised platforms, shelters, lighting, seating, and real-time passenger information displays.

A Stormwater Pollution Prevention Plan and Temporary Erosion and Sediment Control Plan will be implemented and identify best management practices to be applied during construction. The amount of stormwater runoff would not change during operation of the Project because the Project would be located within existing roadway rights-of-way and areas associated with existing impervious surfaces. Any new stormwater facilities would be constructed in accordance with City of Spokane design standards and in accordance with the Spokane Regional Stormwater Manual. Stormwater facilities will be designed to meet Washington State Department of Ecology requirements and will be sized to allow stormwater to infiltrate through native or engineered soils capable of absorbing and filtering pollutants before reaching groundwater.

August 31, 2026

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The Project will result in a *de minimis* permanent use of B.A. Clark Park, including approximately 160 square feet of right-of-way acquisition and 297 square feet of temporary construction easement for a station near the park. These impacts occur in an area already used for sidewalk and transportation purposes and do not affect key park features, access, or recreational activities. Because the park is managed and owned by the City of Spokane Parks and Recreation Department (SPRD), FTA requested the department's written concurrence with the determination pursuant to 23 Code of Federal Regulations (CFR) Part 774.5(b)(2). On August 31, 2026, SPRD concurred with FTA's determination 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.

Under Section 106 of the National Historic Preservation Act, and pursuant to 36 CFR Part 800, FTA consulted with the Washington State Historic Preservation Officer (SHPO) and interested tribes. On June 8, 2026, in correspondence to SHPO and tribes, FTA determined the Project would result in **No Historic Properties Affected** to resources on or eligible for the National Register of Historic Places (NRHP). On July 9, 2026, SHPO concurred with FTA's determination. To address the unlikely event of encountering archaeological resources, Spokane Transit will implement an Inadvertent Discovery Plan during all ground-disturbing activities, and archaeological monitoring will be conducted by personnel that meets the Secretary of Interior Standards during construction.

This letter confirms FTA has determined the Project qualifies as a CE under the National Environmental Policy Act (NEPA) pursuant to 23 CFR Part 771.118(d). This determination applies only to the Project as described above and in the documentation Spokane Transit submitted to FTA October 5, 2023 through July 1, 2026, and is conditioned on implementation of the mitigation measures outlined in that documentation, including Section IV of the CE worksheet, and the requirements set forth in this letter. Should the Project scope change, or new information on the Project or its potential environmental effects be provided, FTA may require a re-evaluation of this NEPA determination and may withdraw or suspend the CE or require additional environmental reviews.

This confirmation is not an expressed or implied promise for Federal financial assistance. Please contact Thomas Bonetti at thomas.bonetti@dot.gov if you have any questions.

Thank you for coordinating with FTA.

Sincerely,

TODD
NICHOLAS
TILLINGER

Digitally signed by TODD
NICHOLAS TILLINGER
Date: 2026.08.31
13:28:33 -07'00'

Todd N. Tillinger, P.E.
Lead Environmental Protection Specialist

cc: Brian Jennings, Deputy Director for Community Development, Spokane Transit
Don Skillingstad, Senior Project Manager, Spokane Transit