

STATE ENVIRONMENTAL POLICY ACT

DETERMINATION OF NONSIGNIFICANCE ADOPTION of EXISTING DOCUMENT

June 30, 2019

Lead Agency: Spokane Transit Authority

Agency Contact: Don Skillingstad, dskillingstad@spokanetransit.com, 509-344-1869

Description of Proposal: The Central City Line is a 5.8 mile bus rapid transit (BRT) system consisting of 32 individual stations that connect major destinations in Spokane, Washington, including the Central Business District, the University District, Gonzaga University, and Spokane Community College along with numerous residential neighborhoods. The vehicles will be modern battery electric buses and will travel with roadway traffic on existing travel lanes. Two charging stations for the vehicles will be constructed at the SCC Transit Center at the eastern terminus of the route. Station amenities will vary in accordance with passenger demand. Station amenities may include shelters, benches, off-board fare collection, real-time signage, and wayfinding. Construction of the project is anticipated to take up to 2-years and will be phased to minimize impacts on adjacent residents and businesses.

The purpose of the Central City Line project is to increase transit ridership, connect residential areas with major employment centers and education districts, and support and stimulate new development throughout the corridor. The project supports the planned economic and residential growth in downtown Spokane and the increased need for transit reliability.

Location of Proposal: The project is located in the city of Spokane, Spokane County, Washington. The 5.8 mile corridor would extend from the Browne's Addition neighborhood immediately west of downtown Spokane, to the SCC Transit Center located at Spokane Community College. A map of the corridor is available at the Spokane Transit Authority website at http://stamovingforward.com/plan/projects/hpt-service-central-city-line#map; by email to cclproject@spokanetransit.com, or at STA, 1230 W. Boone Ave., Spokane, WA 99201

Proponent: Spokane Transit Authority

Title of document being adopted: Federal Transit Administration (FTA) Region 10 Categorical Exclusion and Documented Categorical Exclusion Worksheet. Central City Line Final Categorical Exclusion and Documented Categorical Exclusion Worksheet.

Date adopted document was prepared: March 2019

Description of document being adopted: Central City Line Final Categorical Exclusion and Documented Categorical Exclusion Worksheet, in its entirety. The scope of work

included supporting documentation including: Traffic Analysis and Parking, Air Quality, Hazardous Materials, Noise, Historic and Archaeological Resources, and Endangered Species. No appeals have been filed.

The adopted document is available at: Spokane Transit Authority website at https://www.spokanetransit.com/about-sta/public-notices; email to cclproject@spokanetransit.com, or STA 1230 W. Boone Ave., Spokane, WA 99201

Spokane Transit Authority has identified and adopted this document as being appropriate for this proposal after independent review. The document meets the environmental review needs for the current proposal and will accompany the proposal to the decision maker.

The Spokane Transit Authority has determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This determination is based on the following findings and conclusions: this proposal does not result in significant impacts and mitigation measures have been identified that address potential impacts during construction and operation of the project.

Public Comment Period: This DNS is issued under WAC 197-11-340(2) and the lead agency will not act on this proposal for 14 days from June 30, 2019. Written comments must be submitted no later than **5:00 PM on July 15, 2019**, to the Spokane Transit Authority c/o Don Skillingstad, 1230 West Boone Avenue, Spokane, WA 99201 or via email to cclproject@spokanetransit.com.

Responsible Official: Gordon Howell

Principal Planner

1230 W. Boone Ave. Spokane, WA 99201

(509) 325-6058

Signature

Date 627 19





March 2019

CENTRAL CITY LINE

Final Categorical Exclusion and Documented Categorical Exclusion Worksheet



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FTA Region 10 CATEGORICAL EXCLUSION and DOCUMENTED CATEGORICAL EXCLUSION WORKSHEET

Note: The purpose of this worksheet is to assist sponsoring agencies (grantees) in gathering and organizing materials for environmental analysis required under the National Environmental Policy Act (NEPA), particularly for projects that may qualify as a Categorical Exclusion (CE) or Documented Categorical Exclusion (DCE). The use and submission of this particular worksheet is NOT required. The worksheet is provided merely as a helpful tool for assembling information needed by FTA to determine the likelihood and magnitude of potential project impacts. **NOTE**: **Fields are expandable, so feel free to use more than a line or two if needed**.

Submission of the worksheet does not satisfy NEPA requirements. <u>FTA must concur in writing</u> in the sponsoring agency's NEPA recommendation. Project activities may not begin until this process is complete. Contact the FTA Region 10 office at (206) 220-7954 if you have any questions or require assistance. If this is the first time you have filled out this form, FTA encourages you to review http://www.fta.dot.gov/documents/FTA CE Presentation.pdf. Feel free to contact Region 10 for additional

http://www.fta.dot.gov/documents/FTA_CE_Presentation.pdf. Feel free to contact Region 10 for additional assistance. Please see the end of this document for submittal procedures. For links to other agencies or for further topical guidance, please go to Region 10's Environmental Processes and Procedures site.

I. Project Description		
Sponsoring Agency	Date Submitted	FTA Grant Number(s) (if known)
Spokane Transit Authority	3/6/2019	

Project Title

Central City Line (CCL)

Project Description (brief, 1-2 sentences)

The CCL is a 5.8-mile bus rapid transit (BRT) system consisting of 33 stations that connect major destinations in Spokane, Washington, including the Central Business District, the University District, Gonzaga University, and Spokane Community College along with residential neighborhoods. The vehicles will be modern battery electric buses.

Purpose and Need for Project (brief, 1-2 sentences, include as an attachment if adopted statement is lengthy)

The purpose of the CCL project is to increase transit ridership, connect residential areas with major employment centers and education districts, and stimulate new development in downtown Spokane. The project supports the planned economic and residential growth in downtown Spokane and the increased need for transit reliability. Refer to Attachment A, Purpose and Need Statement, for a detailed purpose and need statement.

Project Location (include City and Street address)

The project is located in the city of Spokane, Spokane County, Washington. The 5.8-mile corridor would begin in the Browne's Addition neighborhood, immediately west of downtown Spokane, and terminate at the Spokane Community College (see Exhibit B-1 in Attachment B, Exhibits).

Project Contact (include phone number, mailing address and email address)

Don Skillingstad

Capital Projects Manager Phone Number: 509-344-1869

Address: Spokane Transit Authority, 1230 West Boone Avenue, Spokane, Washington 99201

Email: dskillingstad@spokanetransit.com

If your project involves construction, include the following as appropriate:

- Project vicinity map
- Project site plan showing access points and project boundaries
- Other useful maps as appropriate (topo, for instance, depending on circumstances, and/or Google Earth aerial, NEPA Assist, etc.)
- A few photographs of the site if useful to illustrate important features
- Details pertaining to the depth of soil excavation
- Note if the soil has been previously disturbed by prior construction or other activity
- List parks or recreation areas within the project vicinity
- Any previous consultations that might be relevant? (HUD, SHPO, or DOTs)

II. NEPA Class of Acti	۸r
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	Answer the following questions to determine the project's potential class of action. If the answer to any of the questions in <u>Section A</u> is "YES", contact the FTA Region 10 office to determine whether the project requires preparation of a NEPA environmental assessment (EA) or environmental impact statement (EIS).
Α.	Will the project significantly impact the natural, social and/or economic environment?
	☐ YES (contact FTA Regional office)
A.1	NO (continue)
	Is the significance of the project's social, economic or environmental impacts unknown?
	☐ YES (contact FTA Regional office)
A.2	NO (continue)
	Is the project likely to require detailed evaluation of more than a few potential impacts?
A.3	☐ YES (contact FTA Regional office)
	NO (continue)
	Is the project likely to generate intense public discussion, concern or controversy, even though it may be limited to a relatively small subset of the community?
	☐ YES (contact FTA Regional office)
	NO (continue)
B.	Does the project appear on the following list of Categorical Exclusions (CEs)? The types of activities listed below describe actions which, when the corresponding conditions are met, are under usual circumstances categorically excluded from further NEPA analysis under 23 CFR 771.118(c). Unusual circumstances may include, but are not limited to, the presence of wetlands, historic buildings and structures, parklands, or floodplains in the project area, or the potential for the project to impact other resources. (Descriptions of each type of activity, and corresponding conditions, are available here ; this worksheet simply lists the name of each exclusion.)
	YES (If checked AND there are no special circumstances, check the applicable box and proceed to Section III.)

	NO (continue to <u>Section II. C</u>)
	23 CFR 771.118(c)(1-16)
	(1) Utility and Similar Appurtenance Action
	(2) Pedestrian or Bicycle Action
	(3) Environmental Mitigation or Stewardship Activity
	(4) Planning and Administrative Activity
	(5) Activities Promoting Transportation Safety, Security, Accessibility and Communication
	(6) Acquisition, Transfer of Real Property Interest
	(7) Acquisition, Rehab, Maintenance of Vehicles or Equipment
	(8) Maintenance, Rehab, Reconstruction of Facilities
	(9) Assembly or Construction of Facilities
	(10) Joint Development of Facilities
	(11) Emergency Recovery Actions
	(Several conditions attach to this type of CE. We recommend you consult with FTA if you think this CE may apply to your action.)
	(12) Projects Entirely within the Existing Operational Right-of-Way.
	(13) Federally Funded Projects
	(Must be less than \$5 million in federal funding, or having a total estimated cost of not more than \$30,000,000 and Federal funds comprising less than 15 percent of the total estimated project cost.)
	(14) Bridge Removal and Related Activities.
	(15) Preventative Maintenance to Certain Culverts and Channels
	(16) Geotechnical and Similar Investigations
C.	Does the project appear on the following list of potential documented Categorical Exclusions?
	Projects that are categorical exclusions under <u>23 CFR 771.118(d)</u> require additional documentation demonstrating that the specific conditions or criteria for the CEs are satisfied and that significant effects will not result.
	☐ NO (Contact FTA Regional Office)
	23 CFR 771.118(d)(1-8)
	(1) Modernization of a highway by resurfacing, restoring, rehabilitating, or reconstructing shoulders or auxiliary lanes.
	(2) Bridge replacement or the construction of grade separation to replace existing atgrade railroad crossings.
	(3) Acquisition of land for hardship or protective purposes. (NOTE: Hardship and protective buying will be permitted only for one or a limited number of parcels, and only

where it will not limit the evaluation of alternatives (including alignments) for planned construction projects. \boxtimes (4) Acquisition of right-of-way. (NOTE: No project development on the acquired right-ofway may proceed until the NEPA process for such project development, including the consideration of alternatives, where appropriate, has been completed.) \boxtimes (5) Construction of bicycle facilities within existing transportation right-of-way. (6) Facility modernization through construction or replacement of existing components. \Box (7) Minor realignment for rail safety purposes \boxtimes (8) Facility modernization/expansion outside existing ROW "Other" actions which meet the criteria for a CE in the CEQ regulations (40 CFR 1508.4) and will not result in significant environmental effects. Actions must not: induce significant impacts to planned growth or land use; require the relocation of significant numbers of people; have a significant impact on any natural, cultural, recreational, historic or other resource; cause significant air, noise, or water quality impacts; have

III. Information Required for Documented Categorical Exclusions

impacts (either individually or cumulatively).

If you checked "Yes" to any of the options in Part II.C, complete Section III.A and each relevant subject area of Sections B-AA. Depending on the project, some of the subject areas may not be applicable. In such cases, no discussion is needed. You may use documents prepared for other purposes (e.g., public meetings) if they are helpful.

significant impacts on travel patterns; or otherwise have significant environmental

The list below is not all-inclusive. If your proposed project has the potential to cause impacts to resources which are not listed below, please provide supplemental information about those potential impacts.

A. Detailed Project Description

Describe the project and explain how it satisfies the purpose and need identified in Part I. Background

The planning for the CCL project began in 1999 with a City of Spokane plan that identified a desire for a streetcar circulator through the downtown area. In 2006, the Spokane Streetcar Feasibility Study affirmed the viability for a downtown circulator to meet the City's development goals and connect key destinations. In 2008, the downtown plan update Fast Forward Spokane reiterated the goal for "Connections [to] link Downtown's retail, recreational, entertainment, medical and cultural facilities with nearby districts and neighborhoods" and the objective to "Increase modal share of alternative transportation (i.e., bike facilities, public transit, pedestrian-friendly streets, revitalized historic trolley routes, high-capacity transit systems)." In 2010, Spokane Transit Authority (STA) adopted Connect Spokane: A Comprehensive Plan for Public Transportation, which established a framework for Spokane's high performance transit network, which includes the Central City Line as a major component of the new service. STA and the City of Spokane completed an alternatives analysis process that evaluated a number of route options and vehicles and selected a Locally Preferred Alternative (LPA) in 2011. The alternatives analysis process was completed in 2012. The LPA alignment extended from Browne's Addition to Gonzaga University. Starting in 2013 a study was conducted to evaluate the extension of the LPA alignment to Spokane Community College, and in 2014, both the STA and the City of Spokane approved resolutions to amend the LPA and include the extension. In 2016, the route of the alignment through Downtown Spokane was adopted, and the CCL vehicle was clarified to be a battery electric bus.

Project Corridor

The CCL project is a proposed 5.8-mile BRT corridor that will connect Browne's Addition to Spokane Community College through Downtown Spokane, the University District, and Gonzaga University (Exhibit B-1). The vehicles will travel with roadway traffic on existing travel lanes, and in a few areas of exclusive guideway.

Travel Way Improvements

The existing roadway infrastructure will mostly remain similar to existing conditions including parking, loading zones, bicycle lanes, and sidewalks. The project includes the following travel way improvements (refer to Exhibit B-2):

- Maple Street and Pacific Avenue (Browne's Addition). Pavement surfacing improvements, geometric improvements and pedestrian crossing improvements.
- Wall Street between Riverside Avenue and Main Avenue (Downtown Spokane). Improves an
 existing festival street (supporting transit, pedestrian and commercial loading only) to support
 CCL vehicles.
- Sharp Avenue Roundabout at intersection of Cincinnati Street and Sharp Avenue (University District). Constructs a roundabout for safe non-motorized and vehicular access through Sharp Avenue.

The travel way improvements noted above will improve the existing pavement conditions to support the weight of the CCL vehicles. In other portions of the corridor, there are planned projects by the City of Spokane and Gonzaga University that improve pavement conditions and for the remaining portions of the corridor the existing pavement is in good condition. Refer to Appendix L, CCL Pavement Corridor Conditions, for additional information.

In addition, to the travel way improvements, the project will also include modifications to signal timing to maintain transit reliability. Improvement locations including the following (Exhibit B-2):

- Mission Avenue/Cincinnati Street (University District) installation of traffic signal and transit signal priority
- Mission Avenue/Hamilton Street (University District) potential signal timing modifications and transit signal priority
- Mission Avenue/Napa Street (East Mission) potential signal timing modifications and transit signal priority
- Mission Avenue/Sycamore Street (SCC Campus) potential signal timing modifications and transit signal priority

Non-Motorized Improvements

In addition to the improvements previously mentioned, the project includes non-motorized improvements that will benefit pedestrians and bicyclists and improve safety. Currently, sidewalks are located on both sides of the street along the corridor. All existing crosswalks will remain in place and at some station locations new painted crosswalks will be added to provide visible and safe crossings. At a number of intersections where station improvements occur the CCL project will improve existing ADA ramps to comply with Americans with Disabilities Act (ADA) requirements.

Where bike lanes exist or are planned by the City of Spokane, island stations are proposed that will allow bicyclists to safely travel behind the stations. Existing bicycle facilities are shown in Exhibit B-2 and include a combination of sharrows (shared lane marking in travel lane), shared roadway (unmarked), and designated bicycle lanes.

As shown in Exhibit B-2 (Downtown), these island stations are proposed for:

- Station 12 (Main Avenue and Howard Street)
- Station 13 (Riverside Avenue and Stevens Street)
- Station 14 (Main Avenue and Bernard Street)
- Station 15 (Riverside Avenue and Bernard Street)
- Station 17 (Riverside Avenue and Division Street)
- Stations 19a, 19b (Spokane Falls Boulevard at WSU)

Additional pedestrian and bicycle improvements are proposed at:

- Maple Street and Pacific Avenue. The project also improves pedestrian crossings at Maple Street and Pacific Avenue adding curb ramps and new pedestrian crossings with ADA compliant refuge islands to provide safer accessibility to this busy pedestrian location.
- Mission Avenue and Cincinnati Street. The project includes a new protected pedestrian and bicycle crossing at the intersection of Mission Avenue and Cincinnati Street. This crossing improves safety for pedestrians and bicyclists crossing the four-lane roadway at Mission Avenue and aligns with the City of Spokane's Cincinnati Greenway project which prioritizes nonmotorized use for Cincinnati Street.

Parking and Loading Zones

Based upon the preliminary design, up to 146 public on-street parking spaces and six (6) loading zones will be removed or displaced in the project corridor within Browne's Addition, Downtown Spokane, and the University District. In addition, approximately 18 off-street parking spaces would be removed on the Gonzaga University campus due to roadway improvements.

Operations (Service Plan)

The CCL is anticipated to operate up to 19 hours on weekdays, beginning as early as 5:00 a.m. and ending as late as 12:00 midnight, offering service every 7.5 minutes during peak periods and 10-minute mid-day service. Saturday service will operate up to 19 hours and may extend to 1:00 a.m.. Saturday service will be every 15 minutes during the day and 30-minute service in the early morning and late evening. Sunday service will operate 12 hours a day, with 15-minute frequency.

CCL Stations and Vehicles

The CCL project will construct 21 station pairs (33 individual stations along the corridor (Exhibit B-1). The existing Upriver Transit Center at the north side of the Spokane Community College campus is being relocated to the south side of the campus independent of the CCL project (Exhibit B-1). The relocated transit center will be the eastern terminus of the CCL project. Construction will be complete prior to the CCL project construction. There are four (4) bus stop layouts proposed: bulbout, center, curbside and island. Exhibit B-3 provides information station type and station kit to be provided at each location and Exhibit B-4 provides details on the station types and the amenities associated with each station kit. All stations support either right-side or left-side boarding. The center station layouts are located in the center of the roadway and allow for left-side boarding. The station area includes station platforms that vary between 45 and 60 feet in length and, depending on location, that station area will include ADA compliant ramps or curb transitions to the pavement or sidewalk. The shorter station platforms will still accommodate the 60-foot long CCL vehicles because the doors of the CCL vehicles will provide access to the station platform area. All of the stations will be accessible according to the ADA requirements. Concrete roadway aprons will be installed at each station to accommodate the weight of the CCL vehicles.

Each station will have amenities scaled in accordance with the passenger demand. Exhibit B-4 provides information on the amenities located at each type of station. Examples of amenities include shelters, benches, wayfinding, pedestrian lighting, off-board fare collection, real-time arrival information, and

security. STA branding of the service will be prominent at the station locations. Stations may also include unique identification elements to clearly distinguish each station along the line.

For the most part, CCL stations are not intended to be shared with other STA routes; however, stations 10, 11, 19a, 19b, 23, and 24 (Exhibit B-2 (Downtown and University District/East Downtown)) could be shared with normal fixed routes. The right-side boarding stations will all be compatible with existing STA buses. Center stations will only be used by CCL vehicles because of the left side boarding. CCL vehicles will also only be used on 1st Avenue and Sprague stations which are one-way streets with left side boarding and on Main Street because it is only served by CCL vehicles. CCL vehicles will lay over at one of three locations (western terminus, central, and eastern terminus) along the corridor (Exhibit B-1). For the CCL project, STA will purchase ten (10) new vehicles that are modern, rubber-tired, battery electric vehicles with zero-emissions, rechargeable through either inductive or conductive charging. The ten (10) vehicles include two (2) spare vehicles to address maintenance issues and provide operational flexibility for events, etc. The CCL vehicles will be 60-foot articulated BRT vehicles with a total of five doors, two doors on the left side and three doors on the right side of the bus. Similar to the stations, the CCL vehicles will be uniquely branded.

CCL Vehicle Charging

In addition to charging of the CCL vehicles at the existing STA maintenance facility, two charging stations will be constructed along the corridor. The charging stations will be located at the eastern terminus of the CCL route, at the Upriver Transit Center (at Spokane Community College), and on Cincinnati Street between Desmet Avenue and Sharp Avenue on the Gonzaga University campus (Exhibit B-1). Charging stations will either be located beneath the surface (inductive charging), which will require excavation to install the equipment, or overhead (conductive charging), which will require above ground equipment to be installed. A charging station beneath the surface will require excavation of an area approximately 6 feet by 8 feet and about 10 feet beneath the surface. For overhead charging, footings will be installed about 8 to 10 feet beneath the surface.

Avista Utilities, the local power provider, will provide power to the charging stations and STA's maintenance facility that will support the CCL. Avista Utilities has provided a "will serve" letter indicating their ability to serve the project (See Attachment N, Avista Utilities Coordination).

CCL Vehicle Maintenance

Maintenance of CCL vehicles will be within the existing STA maintenance facility on Boone Avenue (Exhibit B-1). The CCL project does not require expansion of the maintenance facility for the CCL vehicles. STA is constructing a maintenance/storage garage (Boone Northwest (NW) Garage) expected to be completed and operational in 2019 (Exhibit B-1). The Boone NW Garage is required even without the CCL project to meet overall existing fleet storage and daily servicing needs. The CCL project will need to modify the electrical infrastructure at the Boone NW Garage facility. The CCL vehicles, and required modifications will not occur until after the CCL NEPA documentation is complete and construction on the CCL project begins. Modifications to the Boone NW Garage will be limited to only those essential elements needed to allow depot charging of the CCL vehicles. These modifications include electrical transformer replacement, backup generator replacement and conductor installation. Equipment upgrades include wiring, chargers, transformers, switching equipment and mat foundations for equipment. Refer to Attachment C, CCL Changes Maintenance and Operation, for information.

Utilities

Because the CCL vehicles are battery-operated, there is no need for catenary power infrastructure throughout the alignment. During operations, the CCL vehicles will recharge at either a charging station on Cincinnati Street or at the east terminus at the relocated Upriver Transit Center at Spokane Community College (Exhibit B-1). The charging station on Cincinnati Street will be connected to existing overhead power facilities. The charging station at the east terminus (relocated Upriver Transit Center at the Spokane Community College campus) will require extension of the existing electrical service along

the existing roadway right-of-way.

The construction of the new stations and associated curb ramp modifications will likely require some relocation of existing utilities (electrical, power, stormwater, water service, etc.) as a result of utility conflicts. The majority of the utility relocation will be associated with the removal of existing stormwater catch basins and the installation of new catch basins and connections to the stormwater system. The replacement and relocation of existing water and sewer lines is also anticipated at some of the station locations.

Stations that include real-time traveler information, lighting, and security cameras will require power and communications infrastructure. It is anticipated that existing communications and power infrastructure in the immediate roadway right-of-way will be leveraged.

Property Acquisitions

The CCL project requires 0.27 acres (11,712 square feet) of right of way from four (4) adjacent properties (Exhibit B-5) to construct the project. The remainder of the project is located within existing transportation right-of-way. None of the acquisitions are associated with residential properties. These acquisitions are required for construction of station and travel way improvements and are sliver takes along the edges of the properties and will not affect the use of the adjacent property. Refer to Section III.U, Property Acquisition, for information.

Construction

Construction of the CCL project is anticipated to take up to 2 years. Construction will be phased to minimize impacts to Spokane businesses and residences. Construction activities are anticipated to take place primarily within the existing transportation right-of-way. Staging areas adjacent to the proposed project activities have been identified within existing streets and vacant lots, as available, and if required, additional staging areas will be identified during final design. Construction will affect travel lanes and on-street parking and require the temporary closure of those travel lanes and parking stalls. Sidewalks will be temporarily closed in areas adjacent to station improvements, but there will be signed detour routes. During construction, existing transit services will continue to be provided, but some stops may be relocated temporarily.

The depth of ground disturbance will be approximately 24 inches for roadway modifications and up to 10 feet for installation of below-ground charging and utility installations and relocations. Construction of the charging locations will require excavations up to 10 feet deep for underground inductive charging, or excavations of up to 8 to 10 feet for pole foundations for aboveground conductive charging (refer to Exhibit B-1 for location of the charging stations). Depth of disturbance for utility relocations or installations will be up to 5 feet; however, the majority of utility relocation or installation will be at shallower depths and occur in areas previously disturbed by roadway construction or utility installation. Utility relocation is in the area of station improvements. No demolition of existing structures is required.

B. Location and Zoning

Attach a map identifying the project's location and surrounding land uses. Note any critical resource areas (historic, cultural or environmental) or sensitive noise or vibration receptors (schools, hospitals, churches, residences, etc). Briefly describe the project area's zoning and indicate whether the proposed project is consistent with it. Briefly describe the community (geographic, demographic, economic and population characteristics) in the project vicinity.

The CCL project corridor is located entirely within the City of Spokane. The proposed corridor will connect major activity centers including downtown Spokane and post-secondary schools, and will also travel through five historic districts. The project corridor traverses four key areas: Browne's Addition, Downtown, University District, and East Mission. Existing land uses along the corridor include residential (single-family and multi-family), commercial, institutional, and park. The predominant land uses

adjacent to the project corridor are residential uses in the western portion of the corridor in Browne's Addition and adjacent to Mission Avenue in the eastern portion of the corridor. Downtown Spokane is predominantly commercial and mixed use that transitions to institutional uses in the University District and along East Mission. The project is adjacent to three City of Spokane Parks and the Centennial Trail, which it also crosses (refer to Section III.O, Recreational, for information on these facilities). Existing land uses at the Boone NW Garage and existing maintenance facility area include light industrial and office related uses. Future land uses in the project area are similar to existing uses and are illustrated in Exhibit B-6 (West and East).

Zoning designations adjacent to the corridor include:

- Higher-density residential with a small pocket of neighborhood commercial in Browne's Addition
- A mixture of uses in the Downtown geared towards higher densities
- Higher-density residential that allows institutional uses and office and lower-density residential in the University District
- Primarily single-family residential with pockets of commercial development at intersections in East Mission
- Light industrial and office uses at the Boone NW Garage and existing maintenance facility area The project is consistent with the goals and policies of the City of Spokane Comprehensive Plan. The future land uses support increased development where growth has been targeted along the project corridor. The project is mostly within existing transportation right-of-way and only requires small sliver takes from four (4) properties (Exhibit B-5). The property acquisitions will not affect the use of the property and will not result in significant impacts on adjacent existing or future land uses. Refer to Section III.U, Property Acquisition, for information

Noise-sensitive land uses include the Browne's Addition and East Mission residential areas and the parks adjacent to the corridor. Within 0.25 mile of the project corridor there are a number of community resources including affordable housing developments in the Downtown area. Exhibit B-7 (West and East) provides information on the community resources located within 0.25 mile of the project corridor.

Table 1 below provides information on the demographics of the population within about 0.25 mile of the corridor compared to the City of Spokane. The demographics of the study area are very different from the City as a whole because the corridor travels through the University District and alongside several post-secondary schools. As shown in Table 1, the percent of population between the ages of 18 and 24 is about three times greater than Spokane as a whole, an indicator of a large college population. The lower median household income and higher percentage of the population considered low-income could also be attributed to post-secondary students, who may not work while attending school. There are also several affordable housing units in close proximity to the corridor, which are reflected in the demographics. The percentage of households without a vehicle is also much higher compared to Spokane. Additional information on minority and low-income populations is provided in Section III.G, Environmental Justice.

Table 1: Demographics

Demographic Characteristics	Study Area (0.25-mile)	City of Spokane
Total Population	16,745	210,695
Median Age	39.0	35.6
Population under 18 (% of total population)	12.4	21.7
Population 18 to 24 (% of total population)	30.4	11.6
Population 65 or over (% of total population)	10.7	14.2
Median Household Income (2015 dollars)	\$26,191	\$42,386
Minority Population (% of total population)	21.8	17.4
Low-Income Population (% of total population for whom poverty determined)	37.4	19.3
Limited English Proficiency (% of population 5 years and over)	8.6	1.9
Households with no vehicle (% of total households)	28.1	11.0
Unemployed (% of civilian labor force)	12.7	9.0
Source: 2011-2015 American Community Survey LLS. Census Bureau's America	n Community Su	rvov Offico

Source: 2011-2015 American Community Survey. U.S. Census Bureau's American Community Survey Office, 2016. http://factfinder2.census.gov. Accessed August 16, 2017

C. Traffic

Describe potential traffic and parking impacts, including whether the existing roadways have adequate capacity to handle increased bus or other vehicular traffic. Include a map or diagram if the project will modify existing roadway configurations. Describe connectivity to other transportation facilities and modes, and coordination with relevant agencies.

One of the project objectives is to encourage transit use, thereby decreasing traffic volumes and related congestion. Existing service within the CCL corridor will be consolidated and optimized to align with the new improved CCL service. The optimization and improved service is anticipated to decrease vehicle miles traveled by about 3,900 miles compared to No Build.

Existing Transit Services and Project Related Changes

Much of Spokane Transit's current network can be described as a "hub-and-spoke" model. Currently 27 of STA's 35 routes intersect at the STA Plaza (Exhibit B-1), STA's busiest transit center located in Spokane's Central Business District. The Plaza uses a staggered pulse system to facilitate transfers. Most routes are scheduled for 5 minutes between arrivals and departures. This facilitates connections and inline recovery but requires significant amounts of curb space which is in high demand downtown. Additionally, the hub and spoke model requires some passengers to travel out-of-direction unnecessarily to make a connection.

Implementation of STA Moving Forward service improvements began in 2017. As more service continues to be added to the bus network, operations at the Plaza will be modified in order to operate within design capacity. Additionally, the STA Moving Forward plan assumes restructuring of the bus network to reduce the proportion of riders that will need to make connections at the Plaza and anticipates all routes operating with a maximum headway of 15 minutes or better will "board and go" instead of having a scheduled five minutes at the Plaza. In addition to addressing the capacity problem at the Plaza, this will allow for faster or more direct trips for many passengers. The east-west-running CCL will provide frequent connections to the Plaza freeing up other routes to avoid the Plaza. This will

afford more direct connections to destinations outside of the downtown and the discontinuation of redundant service. Conceptually, after the CCL is implemented, 26 of 40 routes will intersect at the Plaza. Six of these routes will be "board and go" instead of dwelling.

Table 2 below provides a summary of conceptual changes that are directly related to the implementation of the CCL. Refer to Attachment C, CCL Changes Maintenance and Operation, for a detailed description of planned improvements to routes in the CCL corridor that are not directly related to the implementation of the CCL.

Table 2: Changes to Existing STA Transit Routes as a Result of the CCL

#	Current Route	CCL Corridor Neighborhood(s)	Current Headway (in min.)	Current Operating Hours	Changes in Service as result of the CCL
1.	26	University District	30	5:30 AM- 10:45 PM	Proposed to terminate in the University District instead of continuing downtown to the Plaza. Riders wishing to continue downtown will be able to connect to the CCL at E. Spokane Falls Boulevard and N. Sherman Street.
2.	28	University District	30	6:00 AM- 11:20 PM	Discontinue service on portions of Spokane Falls Boulevard to be served by the CCL. The route is proposed to extend south from Hamilton Street over the James E. Keefe Bridge to the South Hill Park and Ride. Passengers wishing to go downtown or to the Plaza will be able to connect to the CCL at E. Mission Avenue and Hamilton.
3.	29	University District and Chief Garry Park	30	6:00 AM- 11:30 PM	Discontinue service on the eastern leg of the route to be served by the CCL. It will be rerouted to provide service from the Plaza to Trent Avenue and Napa Street, via the extended Martin Luther King Boulevard. However, instead of continuing east it proposed to go west along Mission Avenue/Maxwell Avenue to the West Central Community Center.
4.	39	University District and Chief Garry Park	30	6:00 AM- 10:30 PM	To be discontinued. The CCL will provide service on the east portion of the current route on Mission Avenue, from N. Cincinnati Street to Spokane Community College. The western portion of the route will be served by the revised routes 27 and 29.
5.	60/61	Browne's Addition	30	5:30 am – 11:45 pm	Will no longer travel along Pacific Avenue, Spruce Street and W 4th Ave in the Browne's Addition neighborhood to be serviced by CCL.

Traffic Operations

The CCL project will operate in mixed traffic along much of the corridor except along portions of Wall Street between Sprague Avenue and Main Avenue, and Cincinnati Street between Springfield Avenue and Boone Avenue, where transit and non-motorized access will be prioritized. The section of Wall Street between Main Avenue and Riverside Avenue currently restricts vehicular use to transit and non-motorized modes and will be reconstructed as part of the CCL project (refer to Exhibit B-2 for location of improvements). On Cincinnati Street, Gonzaga University is going to reconstruct the street in 2019 to create a more pedestrian/bike-friendly corridor discouraging single-occupancy vehicle traffic.

Buses currently operate along much of the corridor, and with the implementation of the CCL project no noticeable changes are expected in peak hour traffic volumes or intersection level of service (LOS). The Build scenario will not be different from the No Build scenario based on the traffic analysis conducted for the project, which determined that under the Build scenario, even considering transit trips and changes of traffic management, traffic projections are not different than those analyzed under the No Build scenario. Intersections would degrade due to anticipated population growth with or without the CCL project. Refer to Attachment D, Traffic Analysis and Parking Assessment, for additional information. Based on changes in intersection LOS as a result of traffic volume increases that occur with or without the CCL project, the CCL project incorporates elements to improve CCL vehicle movements through the corridor. As described in the project description (Section III.A), these elements include possible signal timing modifications and implementation of transit signal priority improvements at four (4) intersections (Mission Avenue at Cincinnati Street, Mission Avenue at Hamilton Street, Mission Avenue at Napa Street, and Mission Avenue at Sycamore Street) (Exhibit B-2). Refer to Attachment D, Traffic Analysis and Parking Assessment for information on the signal timing improvements. The roundabout at the existing stop controlled intersection of Sharp Avenue and Cincinnati Street will improve traffic operations (Exhibit B-2) and helps to maintain transit reliability.

There will be an increase in the number of buses traveling to and from the Boone NW Garage and maintenance facility, but the increase is expected to be minor because the increase will result in about one or two buses per hour and not result in traffic impacts to the surrounding roadway network.

Parking and Loading Zones

The project is expected to reduce the number of on-street parking spaces by about 146 along the corridor due to the on-street parking removed in Browne's Addition (49 spaces), Downtown Spokane (41 spaces), and in the University District (56 spaces). Attachment D, Traffic Analysis and Parking Assessment, provides information on parking impacts. The on-street parking lost will be a combination of free on street parking in Browne's Addition and the University District along Cincinnati Street and paid parking (2-hour, 4-hour, and all day) in Downtown Spokane and portion of the University District on Spokane Falls Boulevard. A parking utilization study (Attachment D, Traffic Analysis and Parking Assessment) was conducted to better understand the on-street parking utilization (demand for onstreet parking) in the corridor and the potential impact associated with the removal of parking spaces. The study performed utilization counts on two non-consecutive weekdays at 12:00 pm, 5:00 pm, and 8:00 pm. The study area was divided into ten zones based on proximity to stations and included the project corridor and areas within one to two blocks of the corridor. Within the study area there are 2,202 on-street parking spaces and the removal of 146 spaces will reduce available on-street parking by 7-percent. The utilization study found that in all but two zones even with the removal of on-street parking there is available on-street parking within one to two blocks to meet demand. The two zones where demand will be greater than supply are associated with student parking along Cincinnati Street in the University District. Outside of normal school hours there is enough parking available and there is available paid parking within Gonzaga where students could park. In Downtown Spokane there are offstreet parking options including about 9,100 parking spaces within a number of surface lots and multistory parking structures. According to the Downtown Spokane Partnership on average 58 percent of the downtown parking spaces are utilized¹. Of the free on-street parking spaces removed in Browne's Addition the design of the CCL project includes the use of center platform stations along Pacific Avenue, which reduces the potential on-street parking impacts compared to side platforms. STA has been meeting with the neighborhood regarding the center platform station and the parking impacts. At the meetings, the neighborhood has been receptive to the station and the parking impacts, and STA will continue to meet the neighborhood as design progresses to provide more detailed information.

¹ "Getting There: City floats plan to phase parking lots out of downtown", Nicholas Deshais, Spokesman Review. Nov. 13, 2017. Spokane Transit Authority – Central City Line March 2019

In the University District, the project will also remove up to 18 private spaces in a Gonzaga University parking lot.

The CCL project will also impact a total of six (6) loading zones. These loadings zones are a combination of commercial/passenger, commercial/passenger/other, and police parking. Five (5) loading zones are in the downtown area and one (1) in the University District. Within the downtown area there are nearby commercial loading zones that could also be used to replace those impacted. STA is coordinating with the City of Spokane, property owners, and businesses to relocate the zones, where feasible, to reduce impacts. Refer to Attachment D, Traffic Analysis and Parking Assessment, for information.

Non-Motorized

As described in the Section III.A, Detailed Project Description, project includes a number of non-motorized improvements that will benefit pedestrians and bicyclists (Exhibit B-2). These improvements include new crosswalks, curb ramp improvements, a protected crossing, and locating existing and future planned bicycle lanes in an area between the island stations and sidewalks. This will improve non-motorized access and safety at these locations. The addition of the bicycle lanes behind the stations does not result in the loss of on-street parking; however, the construction of the island stations will remove parking.

The project does not remove sidewalks and in locations where the stations are bulbout, the pedestrian area will be widened to maintain ADA compliant travel ways. Sidewalks may also be widened on Wall Street as part of the project and Cincinnati Street as part of the separate Gonzaga University project. The project does not propose to widen sidewalks in other locations.

D.	Aesthetics Will the project have an adverse effect on a scenic vista?
	⊠ No
	Yes, describe
	There are no scenic vistas in the project area. The CCL project is located within developed and urbanized areas.
	Will the project substantially degrade the existing visual character or quality of the site and its surroundings?
	⊠ No
	Yes, describe
	The project will be located within an urban environment on existing streets. STA currently operates bus transit service within the corridor and the introduction of the CCL does not change or degrade the existing visual character. While the new CCL vehicles will look different than existing STA buses, they will travel on many of the same roads currently used by buses. Some existing transit stops will be upgraded to stations with CCL branded amenities. The new stations will have a higher degree of design than existing stops currently in the corridor. The changes are not out of character with the surrounding land uses and will not degrade the existing visual character or quality. Spokane Transit, with coordination by Spokane Arts, is working with neighborhood groups and institutions to provide neighborhood level aesthetic improvements to provide local character to the stations. This also includes the historic districts where stations and layovers will be located. The stations will not make physical changes to these districts and will not affect the characteristics that qualify the districts for listing in the National Register of Historic Places. Refer to Section III.M, Historic and Cultural Resources, for information. STA is working with neighborhoods to incorporate design elements into stations that are reflective of the surrounding neighborhood.
	Will the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?
	⊠ No
	Yes, describe
	The CCL is located within the existing roadway right-of-way in areas with existing street lights. The stations include pedestrian scale lighting, but will not result in a new source of substantial light or glare given the type, height and scale of the proposed lighting. Lighting for the stations will generally include two (2) pedestrian scale shielded lights directed downward and the poles will be approximately 14 feet high. Exhibit B-4 includes information on the station kit of parts including the pedestrian lighting.
E.	Air Quality Does the project have the potential to impact air quality?
	No
	∑ Yes, describe
	The project is anticipated to improve air quality. Implementation of the project is expected to reduce automobile vehicle miles traveled by over 1 million miles annually as more people shift from driving. Reducing vehicle trips and vehicle miles traveled will reduce congestion on roadways and lower greenhouse gas emissions compared to if the project was not implemented. Additionally, the CCL vehicles are zero-emissions, all-electric, battery-operated buses. However, because specific signalized intersections are forecasted to operate at level of service D or below (due to predicted traffic growth

	with or without the CCL project), there is the potential for air quality impacts and a hot spot analysis was conducted. Based on the analysis, the CCL project does not exceed air quality thresholds and will not result in air quality impacts.
	Is the project located in an EPA-designated non-attainment or maintenance area?
	□ No
	Yes, indicate the criteria pollutant and contact FTA to determine if a hot spot analysis is necessary.
	Carbon Monoxide (CO)
	☐ Ozone (O₃)
	Particulate Matter (PM ₁₀ or PM _{2.5})
	The City of Spokane is designated as a maintenance area for carbon monoxide (CO); therefore, a hot spot analysis was conducted to verify that no localized impacts would cause or contribute to a violation of the National Ambient Air Quality Standards (NAAQS). The analysis used the Washington State Department of Transportation (WSDOT) WASIST model to estimate existing (2016), construction (2020), and horizon year (2040) CO levels. Four intersections were identified, and based on the hot spot analysis, the CCL project will not exceed the 1-hour or 8-hour CO NAAQS of 35 parts per million (ppm) and 9 ppm, respectively. Refer to Attachment E, Air Quality Technical Memorandum for information.
	If the non-attainment area is also in a metropolitan area, was the project included in the MPO's Transportation Improvement Program (TIP) air quality conformity analysis?
	□ No
	The CCL project is identified in the 2019 to 2022 Statewide Transportation Improvement Program (ID Number WA-05128) and 2017-2020 Transportation Improvement Program for Horizon 2040 approved in 2013 by the Spokane Regional Transportation Council Metropolitan Transportation Plan (ID Number ST005). Horizon 2040 was updated in December 2017 and identifies the CCL project.
F.	Coastal Zone Is the proposed project located in a designated coastal zone management area?
	No
	Yes, describe coordination with the State regarding consistency with the coastal zone management plan and attach the State finding, if available.
G.	Environmental Justice Determine the presence of minority and low-income populations (business owners, land owners, and residents) within about a quarter-mile of the project area. Indicate whether the project will have disproportionately high and adverse impacts on minority or low-income populations. Describe any potential adverse effects. Describe outreach efforts targeted specifically at minority or low-income populations. Guidance is

(LEP) population, which can be an indicator of minority populations, and on households with no vehicle, which can be an indicator of low-income households. As shown in Table 3, the study area has a greater percentage of minority and low-income populations and households with no vehicles compared to the city of Spokane overall. The LEP population is also comparatively higher with the highest concentration of languages being Spanish and Vietnamese. There are also higher percentages of Russian. The higher percentages in both low-income populations and households with no vehicles is likely influenced by students attending the post-secondary institutions in the study area, who might not work or own a vehicle while at school.

Table 3: Minority and Low-Income Populations

Characteristics	Study Area (0.25-mile)	City of Spokane
Total Population	16,745	210,695
Minority Population (% of total population)	21.8	17.4
Low-Income Population (% of population for whom poverty determined)	37.4	19.3
Limited English Proficiency (% of population 5 years and older)	5.8	1.9
Households with No Vehicle (% of households)	28.1	11.0

Source: 2011-2015 American Community Survey. U.S. Census Bureau's American Community Survey Office, 2016. http://factfinder2.census.gov. Accessed August 16, 2017

Project Effects

Most of the CCL project will be located within existing transportation rights-of-way. Where property acquisitions are required, they will be small sliver takes from adjacent properties that will not result in displacements or affect the use of the property. There are no impacts on traffic, air quality, noise, and vibration during operation. Because the project will be within existing rights-of-way, it will not result in impacts to parks or community facilities during operation. The project results in changes to five (5) existing STA transit routes (see Table 2 in Section III.C, Traffic), but transit service is still provided to all areas and the CCL stations are either in the same location or near the same location as existing STA stops that will be removed; therefore, no impacts are anticipated. The project will remove on-street parking (paid and unpaid), but will not result in impacts because there is available on-street parking within one or two blocks where parking will be removed. In the Downtown Spokane area where on-street parking is metered there is available off-street parking. Refer to Attachment D, Traffic Analysis and Parking, for information.

Construction will result in impacts similar to typical roadway projects, including increases in noise, dust, and construction traffic. These impacts will be temporary and can be reduced through the implementation of best management practices (BMPs) and mitigation measures coordinated through the City of Spokane. Construction activities are not anticipated to be at a single station location for more than four (4) to six (6) weeks. Street improvement projects (on Maple, Wall, and Cincinnati) will take longer depending on the location. Access to adjacent properties will be maintained during construction. Transit service will continue to be provided, but temporary bus stops may be required and STA will provide advance notice and signage. Prior to construction, STA and the City of Spokane will develop a construction schedule and phasing plan to be implemented by future contractors.

Public Outreach

As described in Section III.W, Public Involvement, STA has conducted numerous outreach events to keep the public informed of the project and to provide opportunities for input. STA has held a number of events in locations accessible by transit, including open houses at the STA Plaza and on the Washington State University and Gonzaga University campuses. STA has also held multiple events with the

neighborhood associations along the corridor including Browne's Addition, Riverside, Logan, and Chief Garry to inform the residents and neighborhood leaders and to gather input on design. These neighborhoods are located in areas with higher concentrations of low-income households compared to the City of Spokane. To inform the public of upcoming events, STA is using a number of methods including placing ads in the local newspaper, posting on the STA website and other online social media (Facebook and Twitter), and through direct mailings to those in the surrounding area to educate, notify, or request input. At the meetings childcare is provided upon advance request. Advertisements also include information in Spanish, Russian, and Vietnamese and a phone number to call if translated materials are needed. The translations are based upon the populations that have limited English proficiency. To the extent possible, information at meetings has been presented graphically to address multiple learning styles. The project website is updated regularly and includes language assistance that allows users to view information in another language. STA recently updated their Title VI Program, which includes a number of procedures facilitating public participation in STA planning activities.

STA has prepared a Public Involvement Plan for the project with methods for targeted outreach to minority and low-income populations. These additional strategies are intended to supplement STA's existing engagement activities as part of its Title VI Program and to solicit input from environmental justice populations during key CCL milestones.

STA conducted on online open house between January 29 and February 16, 2018, to provide general information and a project update, including station locations. The purpose of the open house was to solicit feedback to inform the design of the project. Postcards were sent to properties within 0.25 mile of the corridor and included contact information in Spanish, Vietnamese, and Russian to request information in another language. No one requested information in other languages. The majority of the comments were centered around the design and amenities at the stations.

STA also held a service provider roundtable discussion on February 14, 2018. The purpose of the roundtable was to engage with local service providers and organizations that work with environmental justice populations and understand the needs of those they serve. Information was sent to 25 organizations and only two representatives participated in the roundtable. No one requested information in other languages and STA received comments to incorporate as many shelters as possible and ensure that the CCL is accessible to persons with disabilities. STA described the project's accessibility features. STA is following up with a number of the organizations to find out if they have input on the project and how to best coordinate with them on the project moving forward.

Following the service provider roundtable, STA sent letters to service providers to request meetings to provide project information and gather input. STA will continue to reach out to environmental justice populations as the project moves forward through design and construction.

Conclusion

The CCL project will not result in adverse impacts. Overall impacts are minor in nature and scope, and none will be disproportionately high or adverse on minority and/or low-income populations. The CCL project will result in many benefits for all transit users, including improved access to transit and more reliable and frequent transit service, including areas with higher concentrations of environmental justice populations. Benefits from improved transit access and reliability would accrue to a higher degree to low-income populations and households with no vehicle, who tend to rely more heavily on transit. The CCL project will provide frequent connections in Downtown Spokane including the STA Plaza (Exhibit B-1) and will allow other routes to avoid the STA Plaza creating more direct transit connections to destinations outside of Downtown. The CCL project will provide improved transit reliability to existing affordable housing developments (Exhibit B-7 (West and East)). The City of Spokane has adopted plans and policies related to providing affordable housing. Spokane's *Comprehensive Plan* Housing chapters include information on the development of single room units in the Downtown neighborhood and notes this is an important part of the lower-income housing market. Spokane's Multi-Family Tax Credit Project (Spokane Municipal Code 8.15) allows for a 12-year exemption from a portion of property taxes when at

least 20 percent of the housing units in a development are affordable. The CCL project is supportive of these policies, and while transit-oriented development and creation of new employment opportunities benefits all populations, even greater benefits accrue to low-income populations. Н. **Floodplains** Is the proposed project located within the Federal Emergency Management Agency (FEMA) 100-year floodplain? ☐ No Yes, describe potential impacts, indicate if the project will impact the base flood elevation, and include or link to the FEMA Flood Insurance Rate Map (FIRM) with the project location identified. The project is not within the mapped limits of the 100-year floodplain. Based upon the 2010 FEMA FIRM, a small portion of the project corridor near the intersection of Cincinnati Street and Springfield Avenue is located on the outer edge of the 100-year floodplain (Identified as Zone AE). The project improvements in this area include a new center platform station; however, the project will not result in changes to the base flood elevation because the platform will not cause an obstruction and because the project is located outside the mapped floodplain boundary. Further, the Spokane River flood elevation is controlled by a series of dams and flood control structures, which minimize flooding. I. **Hazardous Materials** Is there any known or potential contamination at the project site? This may include, but is not limited to, lead/asbestos in existing facilities or building materials; above or below ground storage tanks; or a history of industrial uses of the site. No, describe steps taken to determine whether hazardous materials are present on the site. Yes, note mitigation and clean-up measures that will be taken to remove hazardous materials from the project site. If the project includes property acquisition, identify if a Phase I Environmental Site Assessment for the land to be acquired has been completed and the results. No hazardous materials impacts are anticipated. A search of federal and state databases was conducted to identify hazardous material sites that are in or adjacent to the project corridor. No information was

No hazardous materials impacts are anticipated. A search of federal and state databases was conducted to identify hazardous material sites that are in or adjacent to the project corridor. No information was collected for the area adjacent to the Boone NW Garage because no ground disturbance is anticipated and modifications required will be within the existing building or on existing pads. There were 162 sites identified within 1/8 mile of the project corridor. The majority of these are considered low risk (144) or moderate risk (17). One site is considered high risk. High-risk sites are those contaminated sites that might create liability for STA due to construction activities. High-risk sites include contaminated sites that are located within the study area and have not received a No Further Action determination from regulatory agencies such as the Washington State Department of Ecology. The one high-risk site is located adjacent to the project corridor, but not adjacent to where project improvements are proposed (Exhibit B-8 (West and East)).

The following provides information on the high-risk site adjacent to the CCL corridor:

• Avista Corp. Spokane Service Center (Facility Site ID 31739484). Located about 325 feet from the nearest CCL station at E Mission Avenue and N Perry Street. The site is currently awaiting cleanup under the Independent Cleanup program. Contaminants listed include petroleum products in soil at concentrations above the cleanup levels. No groundwater contamination was reported for this site.

Potential impacts would occur if contaminated soils or contaminated groundwater were encountered during construction. The high-risk site is about 325 feet from construction activities associated with

stations and about 0.5 mile from the nearest proposed charging location along Cincinnati Street where excavation up to 10 feet would be required. High risk sites are typically associated with groundwater contamination and the construction activities near the high-risk site are at shallow depths (less than 5 feet) where contaminated groundwater, if any exists, would not be encountered. Groundwater depths in the eastern portion of the study area where the high-risk site is located are about 10 to 15 feet beneath the surface based on U.S. Geological Survey information. Groundwater fluctuates seasonally and would be deeper during the dry summer season. Geotechnical boring records for projects in the areas adjacent to the corridor were reviewed, which indicated depths to groundwater were greater than 15 feet, with some showing groundwater at depths over 25 feet. Although there are no high-risk sites close to the charging stations, because groundwater could be encountered at depths around 10 feet beneath the surface, there is the potential to encounter contaminated groundwater. Geotechnical borings conducted as part of the project did not encounter groundwater or contaminated soils. Refer to Attachment F, Hazardous Materials Technical Memorandum, for more information.

The project will not include the acquisition or demolition of any structures. Property acquisitions required for the project will consist of sliver takes along the edges of four properties. One of the property acquisitions is adjacent to a high risk site but no impacts are anticipated because ground disturbance in the area is shallow, up to 5 feet deep, and groundwater is between 10 to 15 feet beneath the surface and deeper during the dry season. However, because property will be acquired, STA will conduct a Phase 1 environmental site assessment for all property acquisitions and, if required, a Phase 2 environmental site assessment.

Operational impacts due to hazardous materials will be limited because the CCL vehicles will be battery-powered and spills are not anticipated. There is the potential for spills from maintenance vehicles during station cleaning and at the maintenance facility during CCL vehicle maintenance, but the potential for impacts will be low. All liquids and spills would be captured and legally disposed of.

J. Navigable Waterways

Does the proposed project cross or have the potential to impact a navigable waterway?

☐ No

Xes, describe potential impacts and any coordination with the US Coast Guard.

The project corridor crosses over the Spokane River in two places using existing bridges (E Spokane Falls Boulevard and E Mission Avenue). The project does not require modifications to the bridges or approaches to the bridges; therefore, it will have no impacts to the navigable waterway. Because there are no changes to the bridges or impacts to navigable waterways, no coordination with the U.S. Coast Guard is required.

K. Noise and Vibration

Does the project have the potential to increase noise or vibration?

□ NO

YES, describe impact and provide map identifying sensitive receptors such as schools, hospitals, parks and residences. If the project will result in a change in noise and vibration sources, you must use FTA's "Transit Noise and Vibration Impact Assessment" methodology to determine impact.

CCL vehicles are battery-electric operated and quieter than existing STA buses currently serving the project corridor, which are diesel-powered. However, because the project will shift travel lanes closer to sensitive receptors (residences) along Pacific Avenue as a result of the construction of center station platforms, a noise analysis was conducted based on FTA's *Transit Noise and Vibration Impact*

Assessment manual (May 2006)² for the entire corridor. Noise-sensitive land uses along the project corridor were identified and used for the analysis. These locations include parks/recreational areas where noise is a concern during daytime hours and residential properties where noise is a concern during nighttime hours.

Major sources of existing noise in the area include Interstate 90 and a railroad corridor, but these are over 500 feet away from receptors. Existing noise levels are based upon FTA's *Estimating Existing Noise Exposure for General Assessment*, and future noise levels were estimated using FTA's *Noise Impact Assessment Spreadsheet*. Table 4 below provides information on the existing and future noise levels. Based on this analysis, the project does not result in noise impacts that would exceed FTA criteria. Refer to Attachment G, Noise Technical Memorandum, for more information.

Table 4: Existing and Future Noise Levels

Noise Receptor	Existing Noise	Project Noise	FTA Nois	e Criteria	
Location	Level	Level	Moderate	Severe	Impact
1 - Coeur d'Alene Park (Bench)	55 dBA	47.9 dBA	55 dBA	61 dBA	No
2 - Residence	55 dBA	51.2 dBA	55 dBA	61 dBA	No
3 - Residence	55 dBA	46.4 dBA	55 dBA	61 dBA	No
4 - Residence	55 dBA	46.1 dBA	55 dBA	61 dBA	No

dBA = A-weighted decibels

The screening procedure in FTA's *Transit Noise* and *Vibration Impact Assessment* was used to determine if additional vibration analysis was required. The CCL vehicles suspension and rubber tires isolate vibration and do not generally cause ground-borne vibrations. There are no buildings that are vibration-sensitive (e.g., buildings with electron microscopes) in the project corridor that will be affected, and the vehicles do not operate inside or directly underneath vibration-sensitive buildings. In addition, transit buses currently operate in the project corridor. Based on the screening procedure, no further analysis is required and no vibration impacts are anticipated.

	required and no vibration impacts are anticipated.
L.	Prime and Unique Farmlands Does the proposal involve the use of any prime or unique farmlands?
	⊠ No
	Yes, describe potential impacts and any coordination with the Soil Conservation Service of the U.S. Department of Agriculture.
M.	Historic & Cultural Resources Impacts to cultural, historic, or recreational properties may trigger Section 106 or tribal consultations or a Section 4(f) evaluation, requiring consideration of avoidance alternatives.
M.	Impacts to cultural, historic, or recreational properties may trigger Section 106 or tribal consultations or a Section 4(f) evaluation, requiring consideration of avoidance

² FTA issued an update to its Noise and Vibration Impact Assessment Guidance Manual in September 2018 and after the assessment was conducted. The Noise and Vibration Impact Assessment Guidance Manual updates were limited to source reference levels for new transit technologies, mitigation policies, and reformatting to improve the readability of the report. Electric bus source reference levels were not changed, therefore, the impact assessment does not need to be updated based on the newest version of FTA's manual.

Yes, provide the approximate maximum ground disturbance depth. Also provide information on previous disturbances or where ground disturbance will occur.
The CCL project will be located within existing right-of-way with minor property acquisitions required from four properties adjacent to the existing right-of-way. Constructing the CCL project requires ground disturbance 2 to 10 feet deep, with the majority of the disturbances about 5 feet deep for utility relocations. Disturbance up to 10 feet is only anticipated at the two CCL vehicle charging locations (Exhibit B-1). Construction of the charging locations requires excavations up to 10 feet deep for underground inductive charging, or excavations of up to 8 to 10 feet for pole foundations for conductive charging.
Existing site records and literature were reviewed to determine if any known archaeological resources were located within the area of potential effect (APE). There are 33 sites within 0.5 mile of the APE, but no sites within the APE. Most of the archaeological sites are located along the Spokane River and Hangman Creek. Much of the APE does have a high to very high risk for archaeological resources based upon Washington Department of Archaeology and Historic Preservation's (DAHP) Predictive Model; however, given the previous ground disturbances associated with the construction of underground utilities, roadways, railroads, and bridges throughout the APE, the likelihood of encountering precontact and historical archaeological deposits that maintain the integrity for listing in the National Register of Historic Places (NRHP) is reduced. No NRHP eligible sites have been identified within the APE.
Given the highly developed nature of the project corridor, including previous roadway construction and underground utilities, subsurface archaeological surveys were conducted within the APE. However, to determine the potential for archaeological resources, geoarchaeological monitoring was conducted for eighteen (18) of geotechnical borings. The geotechnical borings were located along the corridor at station locations and included the areas where the two charging stations will be located. The geoarchaeological monitoring included a visual inspection of the soils and trowel sorting of the materials as well as field lab analysis to determine the presence of archaeological resources. The monitoring determined there are urban disturbances in the soils (native soils that have been mechanically mixed) in all but one of the boring locations. In the one location where intact soils were identified no archaeological resources or evidence or features were observed. Brick fragments were identified at three (3) boring locations but determined not historic. No evidence of in situ buried archaeological deposits, artifact concentrations, or features were observed during the geoarchaeological monitoring of the geotechnical borings. Refer to Appendix D, Geoarchaeological Monitoring Report, in Attachment H, Historical and Archaeological Resources Technical Report, for information. Because the soils were disturbed and no resources were found no monitoring is recommended during construction except for one location. Monitoring will be performed at the Mission and Perry station location on the north side of Mission Street given the proximity to the Spokane River and based on a request from the Spokane Tribe. An Archaeology Construction Monitoring Plan has been developed that identifies the steps to be taking during construction at this location (see Attachment M, Archaeology Construction Monitoring Plan. An Inadvertent Discovery Plan has been developed that identifies protocols to follow if a buried archaeological resource is encounte
Are there any historic resources in the vicinity of the project? No
Yes, Attach photos of structures more than 45 years old that are within or adjacent to the project site and describe any direct or indirect impacts the project may cause.

Historic properties are defined in 36 CFR 800.16 as any historic or prehistoric districts, sites, buildings, structures, objects, landscape, or traditional cultural properties included in or eligible for the NRHP. The

APE for the built environment includes all parcels immediately adjacent to proposed station locations and layover/charging areas. The operation of the CCL in the project corridor reflects the history and use of the roadway corridor as a vehicular route for cars and buses, and, at one time, streetcars. The APE bisects the following five NRHP historic districts: Browne's Addition, Riverside Avenue, East Downtown, West Downtown Historic Transportation Corridor, and Mission Avenue Historic District. Analysis was conducted for buildings and structures built in or before 1971. On November 23, 2016, DAHP concurred with the APE, and on June 27, 2017, it concurred with revisions to the APE based upon design changes.

There are 77 parcels in the APE with buildings that meet the age criteria of construction in or before 1971. Of these 77 parcels, 35 have previously been identified as historic, and the survey conducted for the project identified three (3) more parcels within the APE with properties the project recommends are ineligible for listing in the NRHP. The review and analysis determined that the remaining 39 parcels within the APE do not include historic properties.

The project does not result in noise and vibration impacts (see Section III.K, Noise and Vibration). The only potential impacts to historic resources would be the change in visual setting by the introduction of CCL stations. The project constructs stations in four of the five historic districts located within the APE. The construction of the new stations will slightly alter the setting of the historic districts by adding new stations or layover areas in the street right-of-way or at the sidewalk. It also requires modifications to curbs near stations and at other locations for ADA accessibility. The proposed changes to the historic districts from construction of the stations and layover areas will not make any physical changes to buildings or structures within the historic districts and will not negatively affect the characteristics that qualify the districts for listing in the NRHP. There are be no physical impacts to historic properties from the proposed project. The only direct impacts to historic properties will be changes to their setting as noted above; however, these effects are not adverse. CCL vehicles will cross over one historic property (Mission Avenue Bridge), but the use of the bridge for vehicular traffic is in keeping with its current use. Refer to Attachment H, Historic and Archaeological Resources Technical Report, for information.

The proposed station and layover locations within the historic districts will be within the public right-of-way currently used for transportation purposes. The project will not convert non-transportation properties to a transportation use. Regarding constructive use, given that the project's proximity impacts do not substantially impair the characteristics of adjacent historic properties, there are no constructive uses of historic resources under Section 4(f). Refer to Section III.O, Recreation, for information on Section 4(f).

On July, 12 2018, DAHP and the FTA concurred that the CCL project will have No Adverse Effect on Historic and Archaeological Resources (see Attachment H, Historic and Archaeological Resources Technical Report).

Consultation occurred with Coeur d'Alene Tribe of the Coeur d'Alene Reservation, the Confederated Tribes of the Colville Reservation, the Kalispel Tribe of Indians, the Spokane Tribe, the Nez Perce Tribe, and the Confederated Tribes and Bands of the Yakama Nation. To date, only the Nez Perce Tribe has provided comment. Their comment stated they deferred to the Spokane Tribe for comment.

N. Biological

Are there any species located within the project vicinity that are listed as threatened or endangered under the Endangered Species Act? Determine this by obtaining lists of threatened and endangered species and critical habitat from the US Fish and Wildlife Service and the National Marine Fisheries Service.

There are three (3) species that were found to have the potential to occur in the project area based solely on the project's proximity to areas known, or believed to support, the three species. These species are:

- Columbia River Distinct Population Segment (DPS) of bull trout (Salvelinus confluentus)
- Yellow-billed cuckoo (Coccyzus americanus)

• Water howellia (Howellia aquatilis)

These species were identified for the project area using the U.S. Fish and Wildlife Service's Information, Planning, and Conservation System (iPAC) website (http://www.fws.gov/wafwo/speciesmap.html).

Describe any critical habitat, essential fish habitat or other ecologically sensitive areas within or near the project area.

There is no designated critical habitat for any of the species listed above in the project area. See Attachment I, ESA Screening Checklist. Based upon information in the checklist, the project will have no effect on threatened or endangered species.

O. Recreational

Is the project located in or adjacent to a park or recreation area?

□No

Yes, provide information on potential impacts to the park or recreation area. Please also indicate if the park involved Land and Water Conservation Act funds (Section 6(f))

The project corridor is adjacent to three (3) parks and recreation facilities owned and maintained by the City of Spokane Parks Department (Coeur d'Alene Park, Chief Garry Park, and Mission Park). The Centennial Trail also travels through the City of Spokane, and those portions of the 39-mile trail within the city limits are owned and maintained by the City of Spokane Parks and Recreation Department pursuant to the Spokane River Centennial Trail Interagency Cooperative Agreement approved in 1991, and revised in March 2019. Exhibit B-7 (West and East) illustrates the locations and Table 5 below provides information on the resources. Refer to Attachment J, Section 4(f) Coordination, for information on the temporary use of parks and the *de minimis* determination for the Centennial Trail. There are no parks or recreation areas in the project corridor that are subject to Section 6(f).

Table 5: Parks and Recreation Areas

Park	Approximate Size (acres)	Amenities
Coeur d'Alene Park (Neighborhood Park)	10	Gazebo, tennis courts, basketball courts, splash pads, playground equipment, and restrooms
Chief Garry Park (Neighborhood Park)	11	Baseball fields, basketball court, playground area, picnic tables, and restrooms
Mission Park (Neighborhood Park)	13	Baseball fields, tennis courts, playground area, restrooms, Centennial Trail access, river frontage, and Witter Aquatic Center
Centennial Trail	N/A	Paved multi-use trail extending from Nine Mile Falls to the Washington/Idaho border

Operation of the CCL does not result in acquisition of park or recreation facilities identified above or in noise and vibration impacts. The operation of the project provides improved transit access to the park facilities. The project corridor crosses the Centennial Trail at-grade on Cincinnati Street. There are stop signs on Cincinnati Street at the trail crossing for vehicles traveling northbound and southbound and these stop signs will remain to ensure safety for trail users. Gonzaga University is planning to straighten a portion of the trail on the west side of Cincinnati Street as part of their roadway improvement project. Gonzaga University has provided a letter confirming their commitment to complete the reconstruction of Cincinnati Street within their campus and within their property ownership (See Attachment O, Gonzaga University Coordination).

The project corridor is adjacent to the Centennial Trail along Mission Avenue between Perry Street and the Spokane River. The City of Spokane recently completed the gap in the trail system along Mission Avenue where there was no trail and instead the existing sidewalk served as the trail.

Section 4(f)

Stations will be located adjacent to three parks (Coeur d'Alene, Mission, and Chief Garry), but the project does not result in the permanent take of the parklands. Each of the parks is currently served by public bus stops, and the new CCL stations will use some existing bus stop locations and will also construct new stations adjacent to but outside of the park boundaries. Temporary construction easements are required within each of the parks to allow construction of the stations for a duration of approximately four to six weeks. These temporary construction easements will all be located along the edges of the parks and will not interfere with the use of the park or park amenities.

STA and FTA coordinated with the Spokane Parks Board on the temporary construction easements. The Parks Board signed the Section 4(f) Concurrence Letter on May 5, 2018, for the three parks. Refer to Attachment J, Parks and Section 4(f) Coordination.

There is no Section 4(f) use of the Centennial Trail where it crosses Cincinnati Street because all construction activities would be outside of the trail allowing uninterrupted access and use.

There is a Section 4(f) deminimis impact to the Centennial Trail at Mission Avenue between Perry Street and Upriver Drive where the City of Spokane recently completed trail improvements where previously there was a gap in the trail system. The CCL project requires the temporary relocation of 125 feet of the trail and the permanent relocation of trail about 4 to 6 feet north of the current location; neither the temporary nor permanent trail relocations would adversely affect the activities, features, or attributes of the trail. STA has provided for several opportunities for the public to review and provide comment on the revisions to the Centennial Trail. On February 5, 2019, an online open house went live seeking input from the public on construction related aspects of the project as well as the Mission and Perry Centennial Trail relocation project. The open house was live from February 5 – March 5. On February 19, an in-person open house was held at STA's Plaza in which the same construction and trail related information was presented. Notice of the events was mailed to 176 landowner and taxpayers adjacent to each station location, an email notice was sent to the University District, neighborhoods and Downtown Spokane Partnership. All organizations were asked to forward to their membership. On February 24, 2019, notice of Request for Comment was published in the Spokesman Review notifying the public of the trail project. Notice was provided consistent with 23 CFR 774.5. No comments were made at the meeting or received during the comment period. Based on the impacts and proposed mitigation FTA made a de minimis finding. STA and FTA coordinated with Spokane Parks on the Section 4(f) use and the Parks Department concurred with the Section 4(f) de minimis determination and signed the Section 4(f) de minimis letter on March 6, 2019. Refer to Attachment J, Parks and Section 4(f) Coordination.

Construction impacts on historic buildings and structures can include temporary loss of access, visual effects, noise, vibration, and the dust and debris of construction activities. These impacts can result in a constructive use on historic properties when the impacts are so severe that the protected features that quality the property for protection under Section 4(f) are substantially impaired. As described in Section M, Historic and Cultural Resources, the project will not result in adverse effects on historic properties in the APE during construction, therefore there is no constructive use under Section 4(f).

P. Seismic and Soils

Are there any unusual seismic or soil conditions in the project vicinity? If so, indicate on project map and describe the seismic standards to which the project will be designed.



	Yes, describe
	Soils in the project corridor are primarily Urban Land. Urban Land are those soils that been altered by urban development. There are no unusual seismic or soil conditions in the project area.
Q.	Water Quality Does the project have the potential to impact water quality, including during construction?
	□ No
	igotimes Yes, describe potential impacts and best management practices which will be in place.
	Existing stormwater drainage structures would need to be relocated where there are conflicts with the construction of station platforms. The replacement structures will be constructed in accordance with City of Spokane standards. Based on a review of geotechnical borings drilled in the study area, groundwater depths are generally greater than 15 feet in the project corridor, which is deeper than depths required to construct the CCL project. The project crosses over the Spokane River on existing bridges, but the project does not propose construction in close proximity to the river. During construction, BMPs will be used as specified in the Temporary Erosion and Sediment Control
	(TESC) Plan prepared pursuant to the standards outlined in the <i>Spokane Regional Stormwater Manual</i> as required by the City of Spokane.
	Will there be an increase in new impervious surface or restored pervious surface?
	□No
	igotimes Yes, describe potential impacts and proposed treatment for stormwater runoff.
	The project is located in existing transportation right-of-way primarily within areas already covered with impervious surfaces, and the existing impervious surface areas remains after construction. There will be a minor increase in imperious surface area of about 0.23 acre (10,000 square feet). The increase is associated with the removal of existing landscaped areas that will be converted to impervious surfaces. For most of the corridor the increase does not require new stormwater treatment or disposal facilities and stormwater will be directed to existing facilities. Stormwater treatment at the Gonzaga University Boone Avenue Retail Center facility along Cincinnati Street within the university campus is affected by the project, but the project will replace the swale area lost with equivalent area or media filtration. Impacts to Gonzaga stormwater facilities near existing parking lots are not anticipated, and project design will avoid or mitigate impacts.
	Is the project located in the vicinity of an EPA-designated sole source aquifer (SSA)?
	□No
	Yes, provide the name of the aquifer which the project is located in and describe any potential impacts to the aquifer. Also include the approximate amount of new impervious surface created by the project. (May require completion of SSA worksheet.)
	The eastern portion of the project is located within the Spokane-Rathdrum Prairie Sole Source Aquifer. No impacts to the aquifer are anticipated because depth of construction will not reach groundwater. The project is primarily within areas already associated with impervious surfaces and the project will minimally increase impervious surfaces by about 0.23 acre (10,000 square feet). No impacts are anticipated during construction. A Sole Source Aquifer worksheet was completed for the project and EPA Region 10 concurred that the project will not result in impacts to the aquifer (Attachment K, Sole Source Aquifer Checklist).

R.	Wetlands Does the proposal temporarily or permanently impact wetlands or require alterations to streams or waterways?
	⊠ No
	Yes, describe potential impacts
	There are no wetlands in the project corridor.

S. Construction Impacts

Describe the construction plan and identify impacts due to construction noise, utility disruption, debris and spoil disposal, and staging areas. Address air and water quality impacts, safety and security issues, and disruptions to traffic and access to property.

Construction of the project will last for up to 2 years, but construction activities will not occur continuously in a particular location over the entire construction period. Construction will be phased, and it is anticipated that construction at any one station location will last between four and six weeks depending on the type of station platform, utility relocations, and proposed roadway improvements. Utility relocation will occur first where required, followed by the construction of station platforms and roadway work. Construction staging areas include existing STA property adjacent to the Boone NW Garage, existing street right-of-way, and vacant lots adjacent to the project corridor. If additional construction staging area is required, it would be identified during final design and coordinated with the City of Spokane, and the selected contractor would obtain agreements and required approvals.

Construction activities will require temporary lane closures or lane restrictions. Where roadway improvements are included along Wall Street and north Cincinnati Street, there may be a need for temporary roadway closures to install the context-sensitive pavement. Access to adjacent properties will be maintained. Construction activities could result in the temporary removal of on-street parking for placement of construction equipment and vehicles; however, parking will be maintained on cross streets and based on the parking study (Attachment D, Traffic Analysis and Parking Assessment) there is available on-street and off-street parking available within one to two blocks. Loading zones could also be temporarily affected by construction. Prior to construction, Traffic Control Plans (TCP) will be prepared in coordination with the City of Spokane and fire and police providers to ensure impacts on travel and response times are minimized. The TCP will include information on lane closures and restrictions, roadway closures, and detours.

Sidewalks, crosswalks, and bicycle lanes will remain open to the extent possible during construction. If safe access cannot be maintained, detours will be provided and signage provided. Non-motorized access through construction areas will meet ADA requirements. Existing bus service will be maintained during construction, but may require temporary stop locations depending on the location of construction activities.

Construction impacts associated with the project will be similar to those of typical roadway construction projects, and the project will use similar construction equipment. Impacts will be temporary and may include increases in noise, vibration, dust, and visual impacts. Equipment used during construction could include dump trucks, backhoes, cement mixers and concrete pumps, pavers, vibratory compactors, and other heavy equipment. Construction vehicles will use the roadways along the project corridor to access construction activities. Activities associated with concrete removal are expected to have the highest levels of noise and dust impacts.

Construction will comply with City of Spokane noise regulations, which exempt construction activities from 7:00 a.m. to 10:00 p.m. on weekdays and on the weekends (Spokane Municipal Code 10.08D.040A). If construction activities are required outside of these times, a noise variance from the City of Spokane will be required. Construction equipment will result in vibrations. Although vibrations

will not impact adjacent structures, they might be noticeable to residents and building users. Construction noise and vibration will be temporary and will not occur in one location for the entire project duration. The majority of construction noise and vibration will be associated with typical construction equipment. Noise and vibration levels will depend on the type of equipment being used.

Construction activities involving ground disturbance could encounter contaminated soils or groundwater, but the potential is low because most of the project is within existing right-of-way, where there are no known hazardous material sites. In addition, the project will not require the acquisition of properties with known contamination, and the depths of disturbance will be less than the known depths to groundwater in the project corridor. As with any construction activity, there is potential for spills or leaks from construction equipment, but with the implementation of BMPs, the potential impacts will be minimized.

Construction activities will be adjacent to the three parks discussed in Section III.O. Temporary construction easements (TCEs) will be established behind the proposed station locations adjacent to these parks in case access is required during construction. The TCEs will be along the edges of the parks. The parks will remain open during construction and the proposed TCEs will not interfere with use of the parks or access to the parks. The TCEs will be only be required for the construction duration of the stations about four to six weeks. Refer to Attachment J, Parks and Section 4(f) Coordination, for information. None of the parks are associated with passive/quiet uses and all are within an urban environment subject to existing road and train noise. Access will be maintained, and because the parks are active use, the temporary increases in construction noise will not impact the use of the facilities. Construction of the station on Cincinnati Street will not affect access or require temporary detours for the Centennial Trail. Centennial Trail access will also be maintained on Mission Avenue between Perry Street and Upriver Drive and no temporary detours are required. The project would construct the relocated trail first and trail users would continue using the existing trail. Once the relocated trail section is complete trail users would shift and use the relocated trail and the station would be constructed within the area of the existing trail. During construction of the relocated trail and the station on Mission Avenue the width of the trail would need to be reduced for construction activities, but access would still be maintained.

Construction impacts on historic buildings and structures can include temporary loss of access, visual effects, noise, vibration, and the dust and debris of construction activities; however, these impacts will not result in adverse effects on historic properties in the APE.

There are no wetlands or threatened and endangered species in the area and construction is not in close proximity to the Spokane River, so no construction impacts are anticipated on water resources.

T. Cumulative and Indirect Impacts

Are cumulative and indirect impacts likely?

□No

Yes, describe the reasonably foreseeable:

a) Cumulative impacts, which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes them. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

No significant cumulative impacts are anticipated from the CCL project. Constructing the project along with other planned projects either within or in close proximity to the project corridor could result in temporary cumulative impacts. Other planned projects in the project area that could be under construction in the same timeframe as the CCL project include:

- Cincinnati Street Greenway Spokane Falls Boulevard to Euclid Avenue (2019): greenway street enhancements including new sidewalks, updated ADA compliance, traffic calming elements, marked separate/shared bike lanes, and Greenway signage
- Riverside Avenue Washington Street to Division Street (2020): road reconstruction, repair sidewalks, upgrade lighting, and water/stormwater system upgrades
- Maple Street Riverside Avenue to Pacific Avenue (2021): road construction, repair sidewalks, upgrade signals/communications, and water system upgrades
- Riverside Avenue Monroe Street to Wall Street (2022): road reconstruction, repair sidewalks, bump-outs, bicycle markings, upgrade lighting, and water/stormwater system upgrades
- Howard Street Sprague Avenue to Riverside Avenue (2023): pavement resurfacing, sidewalk repair/updating, curb bump-outs, and upgrading lighting
- Main Avenue Wall Street to Browne Street (2023): pavement resurfacing, sidewalk repair/updating, curb bump-outs, upgrading lighting and water line improvements
- Spokane Community College Master Plan (ongoing): includes the relocation of the existing transit
 center at SCC from the western side of the college to a large parking lot on the southern side of the
 college
- Avista Catalyst Project (to be determined): phased development on 5.5 acre lot with first phase including the construction of an approximate 140,000 square foot building with labs, offices, classrooms, and study areas
- Spokane Transit Authority Boone NW Garage (2019): new vehicle storage facility.
- Centennial Trail Gap Phase 1 (2019): improvements to formalize a trail segment along Mission Avenue
- Cincinnati Street between Springfield Avenue and Desmet Avenue (University District within the Gonzaga University campus) (2019): roadway be upgraded by the University with primarily transit and non-motorized access encouraged. Project includes the realignment of the Centennial Trail on the west side of Cincinnati Street to straighten the trail and improve safety.

A number of the road projects listed above could be under construction at the same time as the CCL on the same roadway, a parallel roadway, or a road that intersects the project. Construction in any one area for the CCL is expected to last four to six weeks. The construction duration for the City of Spokane projects are unknown, but likely to be similar to or longer than the CCL project in any given area. Construction timing for the CCL will be coordinated with these projects, and any lane, road, and sidewalk closures will be coordinated to minimize the amount of overall closure time. Some of the other projects identified above occur on private property adjacent to the corridor and the potential for cumulative construction impacts are limited to hauling of materials and equipment, noise, and dust. Each of the projects identified above will likely require the preparation of environmental documentation by the project sponsor and will identify mitigation measures to reduce impacts during construction for the project. The implementation of mitigation associated with the projects above will minimize cumulative impacts during construction.

The Boone NW Garage will be constructed prior to the CCL project and does not result in cumulative impacts. STA identified an existing deficiency with transit vehicle storage and needs to construct the Boone NW Garage even without the CCL project. The facility is planned to be open in 2019 prior to construction of the CCL project. The Boone NW Garage will be modified as part of the CCL project with modifications limited to those essential elements needed to allow cleaning and depot charging of the CCL vehicles. Refer to Attachment B, Boone Northwest Garage Facility, for information.

b) Indirect impacts, which are caused by the action but are later in time or farther removed in distance, yet are still reasonably foreseeable. Indirect impacts may include growth-inducing effects and other effects related to induced changes in the pattern of

land use, population density or growth rate, and related effects on air, water and other natural systems, including ecosystems.

The CCL is anticipated to result in positive indirect impacts related to economic development and potential transit-oriented development (TOD) near the station locations. In 2014, an Economic Impact Study was completed by ECONorthwest which estimated the potential for approximately \$175 million in new economic development opportunities throughout the corridor area over a 20-year period.

The project will be consistent with City planning efforts and will support mixed-use development and redevelopment along the CCL corridor, particularly in the downtown and University District areas. These areas are identified in City plans including the Comprehensive Plan, Downtown Plan, University District Master Plan, and Strategic Overlay Plan. The project could create a new market for TOD opportunities along the project corridor, which will support economic development and result in beneficial effects related to employment opportunities for those in the project corridor. TOD in the project corridor, including the Avista Catalyst Project, will also provide housing and development consistent with City plans and growth projections for the area.

The CCL does not directly induce population growth, since it is planned to serve existing developed areas, but could provide opportunities for a mix of uses and increased densities in the station areas. Any future TOD or other economic development will undergo separate environmental review as appropriate.

U. Property Acquisition

If property is to be acquired for the project, indicate whether acquisition will result in relocation of businesses or individuals.

Note: For acquisitions over \$500,000, FTA concurrence in the property's valuation is also required.

Property acquisitions include four (4) sliver takes along the edges of properties. The slivers are areas of landscaping or existing impervious surfaces (Exhibit B-5). The sliver takes are small in size and do not affect the overall use of the property. Acquisitions require the purchase of about 0.21 acre (9,193 square feet). The sizes of the four acquisitions range from 462 to 5,386 square feet. There are no residential or business displacements or relocations, and acquisitions do not negatively affect the existing or future land uses. All property acquisitions will comply with the Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1971 as amended. The project also requires permanent easements along existing transportation corridors within the campuses of Gonzaga University and Spokane Community College.

V. Energy

If the project includes the construction or reconstruction of a building, identify potential opportunities to conserve energy which could be employed. This includes building materials and techniques used for construction; special innovative conservation features; fuel use for heating, cooling and operations; and alternative renewable energy sources.

The project does not include the construction or reconstruction of a building. The CCL vehicles will be all-electric, battery-operated buses, which conserve energy, and shelters will use LED lighting to help conserve energy. Avista Utilities will provide the power for the charging locations for the buses and station amenities. The CCL vehicles will introduce a new demand for electricity, but will not result in the need for Avista Utilities to upgrade energy generation or distribution facilities to meet the increase in demand. Avista Utilities plans for increases in energy demand and the increases in demand associated with the buses represents a small percentage of the future demand. STA is conducting a separate planning study in coordination with Avista Utilities to plan for power to ultimately electrify STA's entire fleet and identify strategic locations for charging facilities. Avista Utilities has provided a "will serve"

letter that confirms its intent and capacity to serve the CCL project (See Attachment N, Avista Utilities Coordination).

W. Public Involvement

Describe public outreach efforts undertaken on behalf of the project. Indicate opportunities for public meetings (e.g. board meetings, open houses, special hearings). Indicate any significant concerns expressed by agencies or the public regarding the project.

Throughout project development, STA has undertaken efforts to inform the public about the project and provide opportunities to provide comments, including in-person open houses, neighborhood meetings, individual stakeholder outreach, and online comment opportunities. STA began planning for the CCL in 2009 and the public has been involved in the planning of the project at every step since that time. In 2009, the City of Spokane and STA sent postcards to residents and business owners throughout Spokane, inviting them to be part of a Community Sounding Board and participate in the Downtown Transit Alternatives Analysis process. Selection of the Community Sounding Board was diverse both geographically and demographically. Two open houses were held in 2010 with information on alignment alternatives and provided an opportunity to provide feedback. An open house in 2011 was focused on the Locally Preferred Alternative corridor and mode. A Core Stakeholder Group and Technical Advisory Group also met and provided input on the alternatives.

STA initiated a CCL Steering Committee in November 2015 that includes representatives from the City of Spokane, STA, Avista Corporation, DCI Engineers (representing downtown businesses), Downtown Spokane Partnership, University District, Visit Spokane, Gonzaga University, Community Colleges of Spokane, Washington State University, Greater Spokane Incorporated, Spokane Public Facilities District, Browne's Addition Neighborhood, Riverside Neighborhood, Logan Neighborhood, Chief Garry Park Neighborhood, People First (representing people with disabilities), and Cheney Free Press (representing areas west of Spokane. Fourteen (14) meetings have been held since November 2015. The purpose of the Steering Committee is to provide policy and strategic guidance for CCL project development, provide project-related recommendations and input to the STA Board of Directors and Spokane City Council, provide connection to the community through participation on the committee, and further the vision of the STA Moving Forward plan through successful collaboration. All meetings are open to the public and all meeting materials and minutes are available on the STA website. Further, all meetings are advertised on STA's website and notices are published in the local newspaper.

STA and the City of Spokane held three public workshops in 2015 and 2016 focused on station area planning:

- Chief Garry Park Neighborhood November 12, 2015
- University District/East Downtown February 2, 2016
- Browne's Addition/West Downtown March 1, 2016

The purpose of these workshops was to understand community concerns and desires, identify transit-supported development opportunities, and develop recommendations for future land use, affordable housing, and economic development to help the CCL meet community needs. Participant input helped shape the CCL Strategic Overlay Plan for the project, which was adopted by the Spokane City Council in September 2016. Workshops were held in transit-accessible locations.

A 30-day online open house was held in March and April 2016 to solicit feedback on the draft land use plans, economic development, and transportation policy ideas and actions that the project team developed for the corridor. A total of 74 public comments were collected during this open house. In addition, three brownbag lunches were held in January 2016 in the downtown core where residents, property owners, and employers could learn about the CCL project and provide input. Flyers were distributed to residents, business owners, and employers throughout the corridor.

STA has met and will continue to meet with neighborhoods along the project corridor including Browne's Addition, Chief Garry Park, Riverside, and Logan. During these meetings updates on the project are provided and input on the various stages of project development are collected.

During 2016 and early 2017, STA staff attended a number of neighborhood association meetings to share information about the project and collect feedback from residents and business owners. An outreach video was released on the project website in June 2017 to explain the project, how high-performance transit works, and the benefits to the community.

In October 2017, STA held an open house at Gonzaga University. To inform the public about the meeting, over 9,400 postcards were sent to properties within 0.25 mile of the corridor including 107 letters to property owners immediately adjacent to station locations and postcards to community organizations that represent environmental justice populations. The meeting provided background information on the project and the purpose of the meeting was to solicit feedback on the station design, location and amenities.

To reach those who may not be able to attend meetings in person, STA held a second online open house from January 29 to February 16, 2018 to solicit feedback on the stations and the overall project. To inform the public about the online open house STA posted notices on the project website, sent postcards to those within 0.25 mile of the project corridor, and provided information at stakeholder meetings, a press release to local media and advertisement through social media. The format included general project information, history of the project, timeline through construction and opening, and information on station concepts. The open house also included an interactive map that allowed users to view the corridor and zoom into specific areas to see locations. The online map also allowed users to click on stations to view the type of station and the amenities at each station. There was also the opportunity to provide comments on the stations as well as general feedback on the project. Overall, 187 comments were received on the CCL stations and the project. Comments included support for the project and specific station locations, the need for additional amenities at some station locations, and ensuring the stations fit the character of the surrounding neighborhoods. STA will use the feedback collected and to the extent possible refine the station designs as the project moves forward. STA held an in-person public open house on February 19, 2019 as part of an online open house from February 5 to March 5, 2019 to inform the public on the status of the project and collect community feedback. At the public open house, STA provided boards and information as part of the Section 4(f) determination related to the relocation of a portion of the Centennial Trail on Mission Avenue between Upriver Drive and Perry Street. No comments were received regarding the Mission and Perry station, nor the proposed changes to the Centennial Trail.

STA will continue to reach out and provide information to the public and stakeholders as the project moves through design and development stages. STA will consult with community organizations serving low-income and minority residents in the corridor to ensure that meetings and outreach are effective to collect input from those who may not traditionally participate in planning processes.

X. Mitigation Measures

Describe all measures to be taken to mitigate project impacts.

The following section provides information on the mitigation measures and BMPs that could be implemented during construction and operation of the CCL project. Prior to and throughout construction of the project, STA will provide information and reach out to the public, businesses, transit riders, and stakeholders about construction activities in a variety of ways including through its committees, Board of Directors, City of Spokane communications department, email notifications and updates, scheduled meetings with stakeholder groups and or individual stakeholders, the project web site, and social media and/or flyers.

Construction Mitigation

STA will comply with the City of Spokane General Special Provisions and all applicable federal, state, and local regulations. BMPs will be developed and implemented prior to construction. The project will prepare a Stormwater Pollution Prevention Plan (SWPPP), a TESC Plan, and a Spill Prevention, Control, and Countermeasures (SPCC) Plan.

Traffic

- Prior to construction, STA and the City of Spokane will develop a construction schedule and phasing plan to be implemented by future contractors.
- STA will prepare a Traffic Control Plan in coordination with the City of Spokane and fire and
 police providers. The TCP will include information on lane/roadway closures, detours for both
 vehicles and non-motorized users as needed, and temporary bus stops and waiting areas for
 transit riders. The TCP will be prepared during final design and approved prior to construction.
 As necessary, STA will schedule traffic impact sensitive construction at night and on weekends
 to minimize traffic and non-motorized impacts.
- STA will post advance notice and signage related to temporary relocation of transit stops in advance of construction.
- STA will use temporary loading zone designations to maintain commercial and passenger loading zones in proximity to businesses.

Aesthetics

• If nighttime construction is required, lighting will be shielded and directed downward to avoid impacts on adjacent properties.

Air Quality

BMPs for air quality will be developed prior to construction by the selected contractor, and may include the following measures, as appropriate:

- Spraying exposed soils to minimize dust
- Sweeping to remove particulate matter on paved public right-of-way
- Proper maintenance of equipment
- Reducing idling time for vehicles and equipment

Hazardous Materials

• In addition to the SWPPP, TESC Plan, and SPCC Plan to be prepared as part of the project, the contractor will prepare required site-specific hazardous material plans and health and safety plans.

Noise and Vibration

BMPs for noise and vibration will be developed prior to construction by the selected contractor and may include the following measures, as appropriate:

- Using properly sized and maintained mufflers on construction equipment
- Turning off idling equipment
- Placing noisy equipment away from nearby sensitive receptors
- Using portable noise barriers
- Avoiding construction in residential areas during nighttime hours

Historic and Cultural

- The project Inadvertent Discovery Plan identifies procedures STA will follow if archaeological resources are encountered during construction.
- Archaeological monitoring will be performed at the Mission and Perry station location on the

north side of Mission Street. The Archaeology Construction Monitoring Plan identifies the steps to be taking during construction at this location.

Recreation

STA will coordinate with City of Spokane Parks and Recreation Department prior to construction to confirm mitigation measures related to:

- The temporary noise impacts to the three adjacent city parks.
- Maintaining trail access to the Centennial Trail along Mission Avenue during the trail relocation and station construction between Perry Street and Upriver Drive.

Water Quality

- The SWPPP, TESC Plan, and SPCC Plan will be developed and implemented prior to construction to control sediment and other pollutants and protect downstream water resources.
- All proposed stormwater management facilities will be designed in accordance with the Spokane Regional Stormwater Manual.
- Any new drywells will be registered with the Department of Ecology through the Underground Injection Control (UIC) program.

Property Acquisition

• STA will comply with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1971 as amended. Property owners of the four (4) properties will be compensated at fair market value.

Operation Mitigation

STA will coordinate with the City of Spokane and to mitigate the loss of loading zones within the
Downtown area and with Spokane Community Oriented Policing Services (COPS) and the City of
Spokane to mitigate the loss of the police parking zone. Project design addresses the removal of
one (1) loading zone in the downtown area. Mitigation to address the removal of the other
loading zones could include replacement by the conversion of on-street parking in the same
area.

Because there is on-street parking available in all areas with removal of on-street parking and available off-street parking in the Downtown and University District neighborhoods, no other mitigation related to parking or loading zones is proposed during operation of the CCL project.

	to parking of loading zones is proposed during operation of the CCL project.
Υ.	Other Federal Actions
	Provide a list of other federal NEPA actions related to the proposed project or in the vicinity.
	Other federal NEPA actions in the vicinity include:
	WSDOT US 395 – North Spokane Corridor
Z .	State and Local Policies and Ordinances Is the project in compliance with all applicable state and local policies and ordinances? ☐ No, describe noncompliance: ☐ Yes
AA.	Related Federal and State/Local Actions Corps of Engineers Permit (Section 10, Section 404) Coast Guard Permit

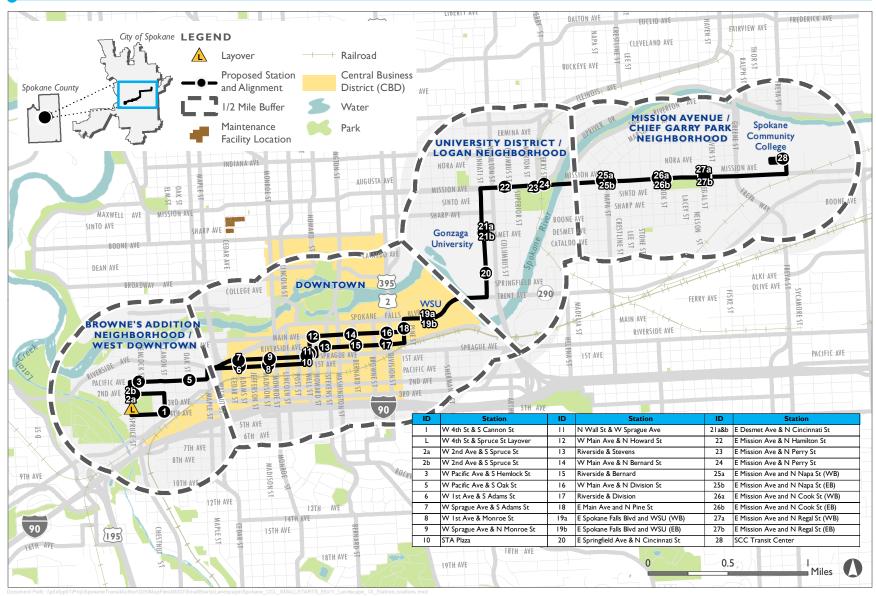
Coastal Zone Management Certification
Critical Area Ordinance Permit
☐ ESA and EFH Consultation
☐ Floodplain Development Permit
Forest Practice Act Permit
Hydraulic Project Approval
□ Local Building or Site Development Permits
□ Local Clearing and Grubbing Permit
□ National Historic Preservation Act-Section 106 consultation
☐ National Pollutant Discharge Elimination System General Construction Permit
Shoreline Permit
Solid Waste Discharge Permit
Sole Source Aquifer Consultation ■ Consultation ■ Con
⊠ Section 4(f) (Historic or Recreational Properties; Wildlife Refuges)
Section 6(f) (Recreational Properties)
Section 106 (Historic Properties)
⊠ Stormwater Site Plan (SSP)
☐ Temporary Erosion and Sediment Control Plan (TESC)
☐ Water Rights Permit
☐ Water Quality Certification—Section 401
☐ Tribal Consultation or Permits (if any, describe below)
Other
Others (describe as applicable):
Submitted By (name, title): Date: 3/6/19
•

Please submit two paper copies of this form, attachments, and a transmittal letter recommending a NEPA finding to the address below, <u>or</u> submit an electronic version to <u>fta.tro10mail@dot.gov</u>. Contact FTA at the number below if you are unsure of these procedures. Modifications are typically necessary.

Federal Transit Administration, Region 10 915 2nd Avenue, Suite 3142 Seattle, WA 98174-1002 phone: (206) 220-7954 fax: (206) 220-7959 fta.tro10mail@dot.gov

For links to further topical guidance, please visit Region 10's **Grantee Resources: Environment** webpage.

CENTRAL CITY LINE Station Locations







REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 7, 2019

Ms. E. Susan Meyer Chief Executive Officer Spokane Transit Authority 1230 West Boone Avenue Spokane, WA 99201-2686

Subject: Spokane Transit Authority – Central City Line Project

NEPA Documented Categorical Exclusion Confirmation

FTA Grant No.: WA-95-X082

Dear Ms. Meyer:

The Federal Transit Administration (FTA) has reviewed the materials submitted by the Spokane Transit Authority (STA) by e-mail on March 6, 2019, including an FTA Documented Categorical Exclusion (DCE) worksheet and supporting documentation describing the proposed Central City Line (CCL) Project (Project) in Spokane, Washington. FTA understand that the Project is a 5.8-mile bus rapid transit (BRT) system consisting of 21 station pairs (34 individual stations) that connect major destinations in Spokane, Washington, including the Central Business District, the University District, Gonzaga University, and Spokane Community College along with residential neighborhoods. STA will purchase ten (10) new vehicles that are modern, rubber-tired, battery electric vehicles with zero-emissions, rechargeable through either inductive or conductive charging. FTA further understands that as part of the Project, STA will implement the mitigation measures outlined in Attachment A to this letter.

Based on a review of the submitted documentation, FTA has determined that the Project qualifies as a DCE under the National Environmental Policy Act (NEPA) pursuant to 23 Code of Federal Regulations (CFR) Section 771.118(d). This determination of DCE applies only to the proposed CCL Project as described above and in the March 6, 2019 documentation submitted to FTA, and is contingent on STA implementing the mitigation measures outlined in Attachment A to this letter. Should the Project scope change or new information on the Project or its potential environmental effect be provided, FTA may require a re-evaluation of the NEPA determination and may withdraw or suspend the DCE or require additional environmental reviews.

March 7, 2019 Page 2

This confirmation is not an expressed or implied promise that Federal financial assistance for the Project will be awarded. Please contact John Witmer at 206-220-7964 or john.witmer@dot.gov if you have any questions.

Thank you for coordinating with FTA.

Sincerely,

Linda M. Gehrke Regional Administrator

cc: Don Skillingstad, STA Karl Otterstrom, STA Daniel Wells, STA

Attachment A

Spokane Transit Authority – Central City Line Project (CCL) NEPA Documented Categorical Exclusion Confirmation Mitigation Measures March 07, 2019

Construction Mitigation

1. STA will comply with the City of Spokane General Special Provisions and all applicable federal, state, and local regulations. BMPs will be developed and implemented prior to construction. The project will prepare a Storm Water Pollution Prevention Plan (SWPPP), a TESC Plan, and a Spill Prevention, Control, and Countermeasures (SPCC) Plan.

Traffic

- 2. Prior to construction, STA and the City of Spokane will develop a construction schedule and phasing plan to be implemented by future contractors.
- 3. STA will prepare a Traffic Control Plan in coordination with the City of Spokane and fire and police providers. The TCP will include information on lane/roadway closures, detours for both vehicles and non-motorized users as needed, and temporary bus stops and waiting areas for transit riders. The TCP will be prepared during final design and approved prior to construction. As necessary, STA will schedule traffic impact sensitive construction at night and on weekends to minimize traffic and non-motorized impacts.
- 4. STA will post advance notice and signage related to temporary relocation of transit stops in advance of construction.
- 5. STA will use temporary loading zone designations to maintain commercial and passenger loading zones in proximity to businesses.

Aesthetics

6. If nighttime construction is required, lighting will be shielded and directed downward to avoid impacts on adjacent properties.

Air Quality

- 7. BMPs for air quality will be developed prior to construction by the selected contractor, and may include the following measures, as appropriate:
 - a. Spraying exposed soils to minimize dust
 - b. Sweeping to remove particulate matter on paved public right-of-way
 - c. Proper maintenance of equipment
 - d. Reducing idling time for vehicles and equipment

Hazardous Materials

8. In addition to the SWPPP, TESC Plan, and SPCC Plan to be prepared as part of the project, the contractor will prepare required site-specific hazardous material plans and health and safety plans.

Noise and Vibration

- 9. BMPs for noise and vibration will be developed prior to construction by the selected contractor and may include the following measures, as appropriate:
 - a. Using properly sized and maintained mufflers on construction equipment
 - b. Turning off idling equipment
 - c. Placing noisy equipment away from nearby sensitive receptors
 - d. Using portable noise barriers
 - e. Avoiding construction in residential areas during nighttime hours

Historic and Cultural

- 10. The project Inadvertent Discovery Plan identifies procedures STA will follow if archaeological resources are encountered during construction.
- 11. Archaeological monitoring will be performed at the Mission and Perry station location on the north side of Mission Street. The Archaeology Construction Monitoring Plan identifies the steps to be taking during construction at this location.

Recreation

- 12. STA will coordinate with City of Spokane Parks and Recreation Department prior to construction to confirm mitigation measures related to:
 - a. The temporary noise impacts to the three adjacent city parks.
 - b. Maintaining trail access to the Centennial Trail along Mission Avenue during the trail relocation and station construction between Perry Street and Upriver Drive.

Water Quality

- 13. The SWPPP, TESC Plan, and SPCC Plan will be developed and implemented prior to construction to control sediment and other pollutants and protect downstream water resources.
- 14. All proposed stormwater management facilities will be designed in accordance with the *Spokane Regional Stormwater Manual*.
- 15. Any new drywells will be registered with the Department of Ecology through the Underground Injection Control (UIC) program.

Property Acquisition

16. STA will comply with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1971 as amended. Property owners of the four (4) properties will be compensated at fair market value.

Operation Mitigation

17. STA will coordinate with the City of Spokane to mitigate the loss of loading zones within the Downtown area and with Spokane Community Oriented Policing Services (COPS) and the City of Spokane to mitigate the loss of the police parking zone. Project design addresses the removal of one (1) loading zone in the downtown area. Mitigation to address the removal of the other loading zones could include replacement by the conversion of on-street parking in the same area.

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