



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION X  
Alaska, Idaho, Oregon,  
Washington

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November 8, 2024

Susan Meyer  
Chief Executive Officer  
Spokane Transit Authority  
1230 W. Boone Avenue  
Spokane, WA 99201

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

Dear Ms. Meyer:

The Federal Transit Administration (FTA) has reviewed the materials Spokane Transit submitted by e-mail July 26, 2024 thru November 5, 2024, including an FTA Categorical Exclusion (CE) worksheet and supporting documentation describing the proposed Division Street Bus Rapid Transit (BRT) Geotechnical Investigations Project (Project) in Spokane, Washington.

FTA understands the Project consists of subsurface geotechnical explorations within the operational right-of-way to inform preliminary design efforts for the future BRT project. Activities will include drilling test bores for geotechnical evaluation and sampling to collect essential subsurface information to support engineering and design activities related to planned transit infrastructure improvements. The project is limited to data collection activities and does not involve any construction or substantial ground disturbance.

The geotechnical explorations will consist of 22 test borings at specific locations along the project alignment. These borings will extend to a maximum depth of 25 feet and will be executed using a truck-mounted drill. To ensure environmental responsibility and compliance, cuttings generated during drilling will be carefully returned to the borehole, and the borings will be sealed with a bentonite hole plug. Throughout the drilling process, they will collect 2.5-inch split spoon samples of encountered soils at approximately 5-foot-depth intervals.

Under Section 106 of the National Historic Preservation Act, and pursuant to 36 CFR Part 800, FTA consulted with the Washington State Historic Preservation Officer (SHPO) and interested tribes. On September 16, 2024, in correspondence to SHPO and tribes, FTA requested feedback on the proposed Area of Potential Effects (APE) for the 10-mile-long BRT corridor and the proposed pre-construction geotechnical investigations to determine if there would be any adverse effect to resources on or eligible for the National Register of Historic Places. On September 17, 2024, SHPO concurred with FTA's proposed APE. An Inadvertent Discovery Plan (IDP) will be implemented during all ground-disturbing activities. The IDP will describe the protocols to be followed if archaeological resources are discovered.

This letter confirms FTA has determined the Project qualifies as a CE under the National Environmental Policy Act (NEPA) pursuant to 23 CFR Part 771.118(c)(16). This determination applies only to the Project as described above and in the documentation Spokane Transit submitted to FTA July 26, 2024 thru November 5, 2024, and is conditioned on the requirements set forth in this letter, including the implementation of an IDP during all ground-disturbing activities. Should the Project scope change, or new information on the Project or its potential environmental effects be provided, FTA may require a re-evaluation of this NEPA determination and may withdraw or suspend the CE or require additional environmental reviews.

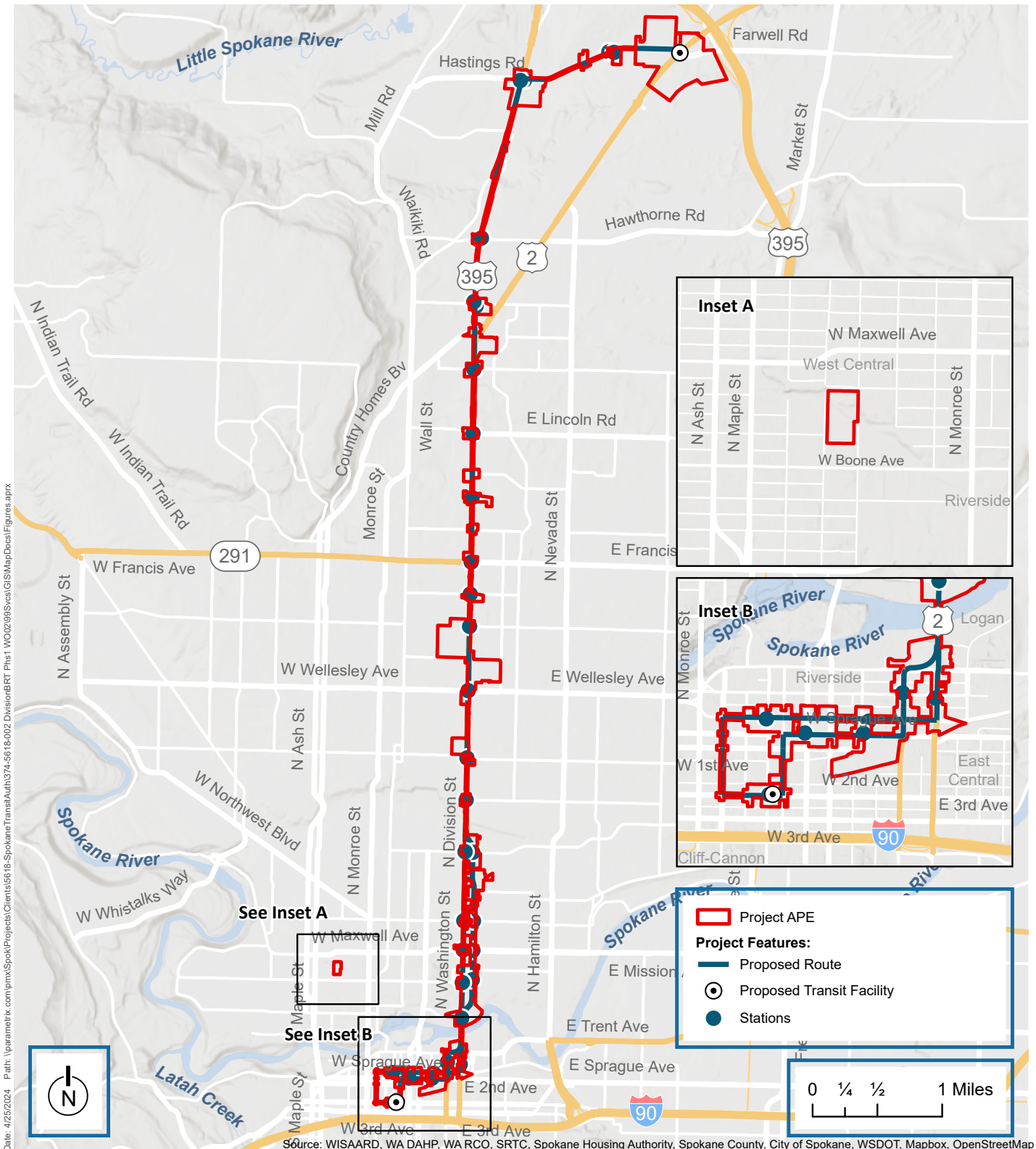
This confirmation is not an expressed or implied promise that Federal financial assistance for the Project will be awarded. Please contact me at [thomas.bonetti@dot.gov](mailto:thomas.bonetti@dot.gov) if you have any questions.

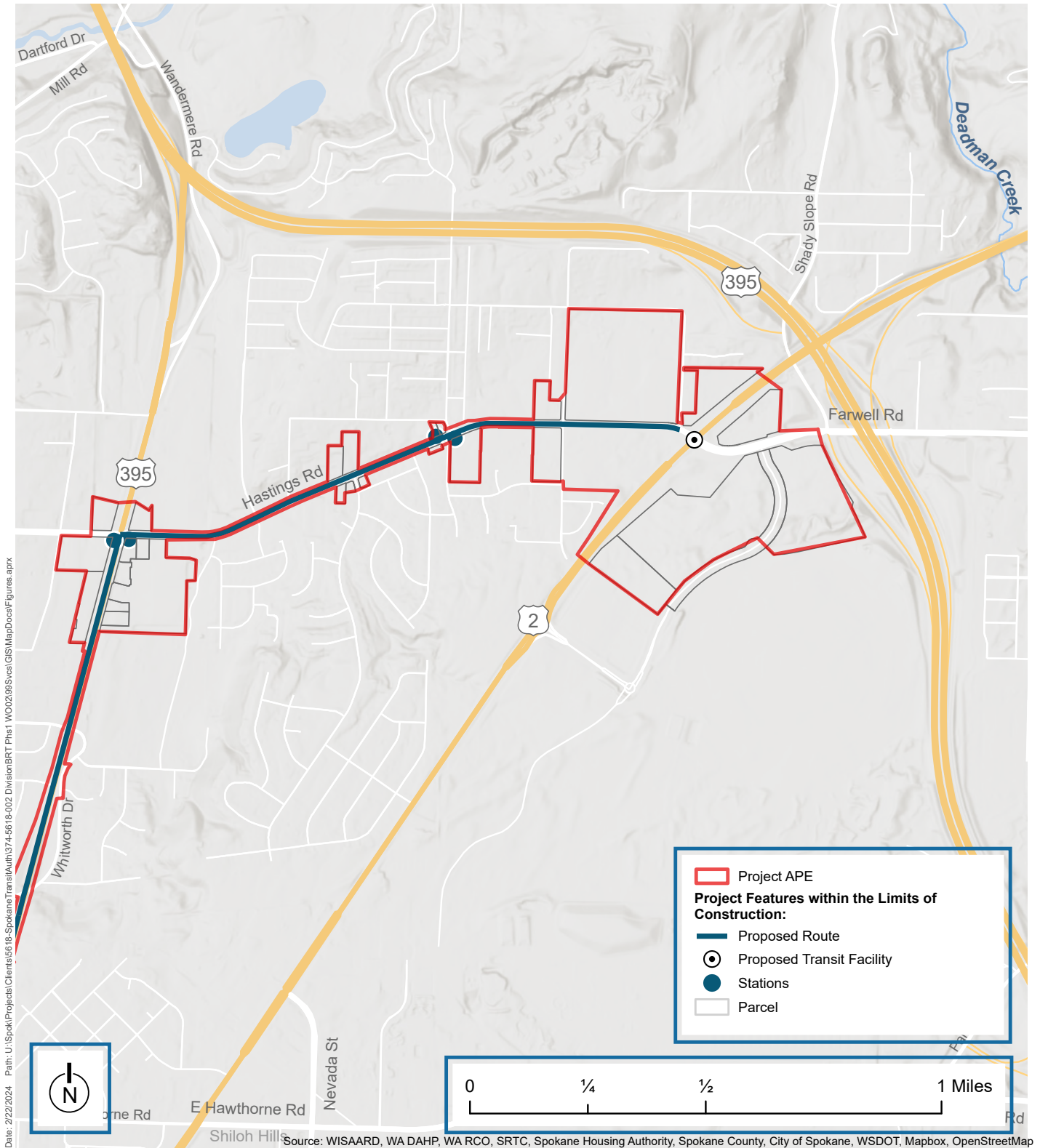
Thank you for coordinating with FTA.

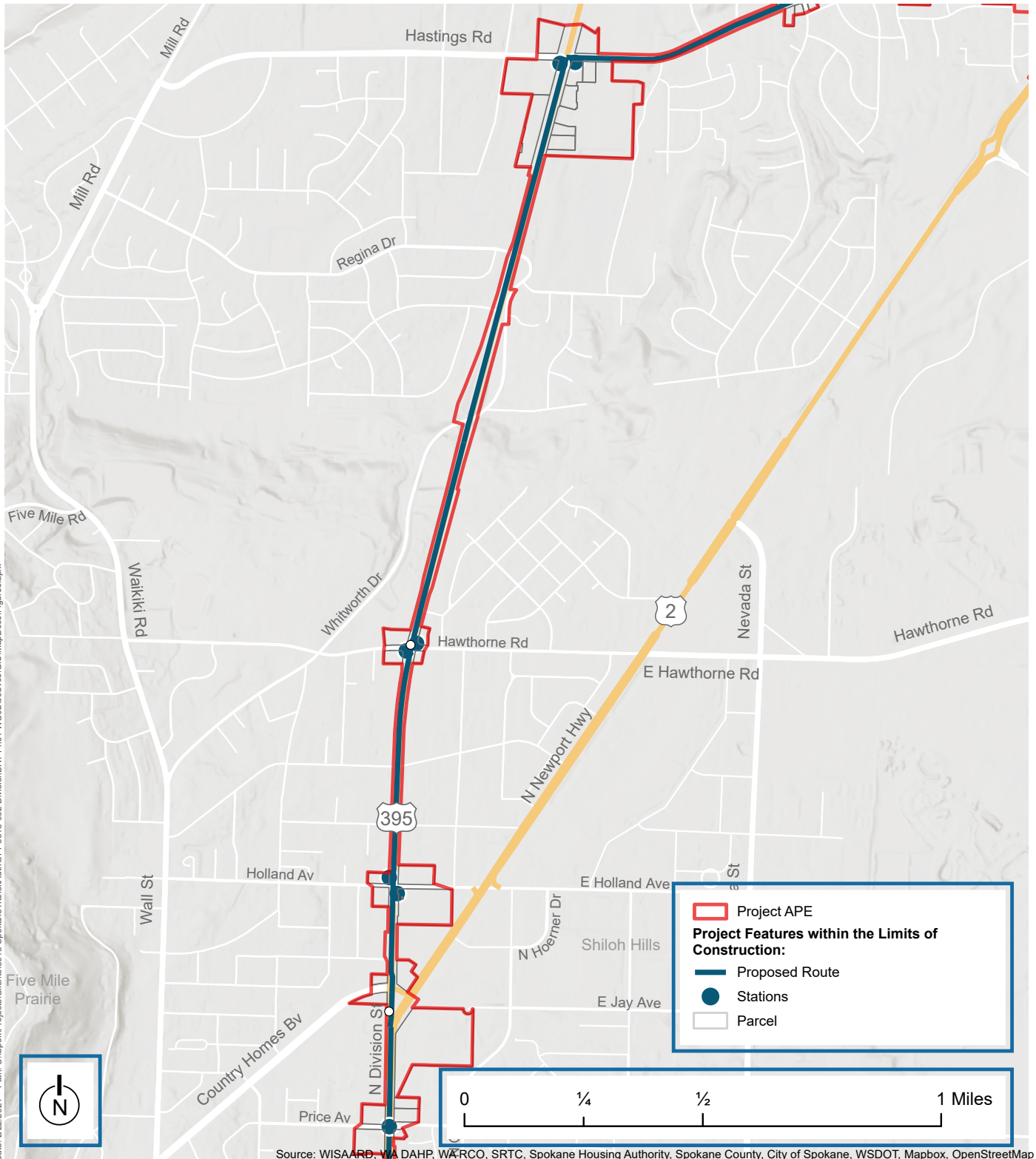
Sincerely,

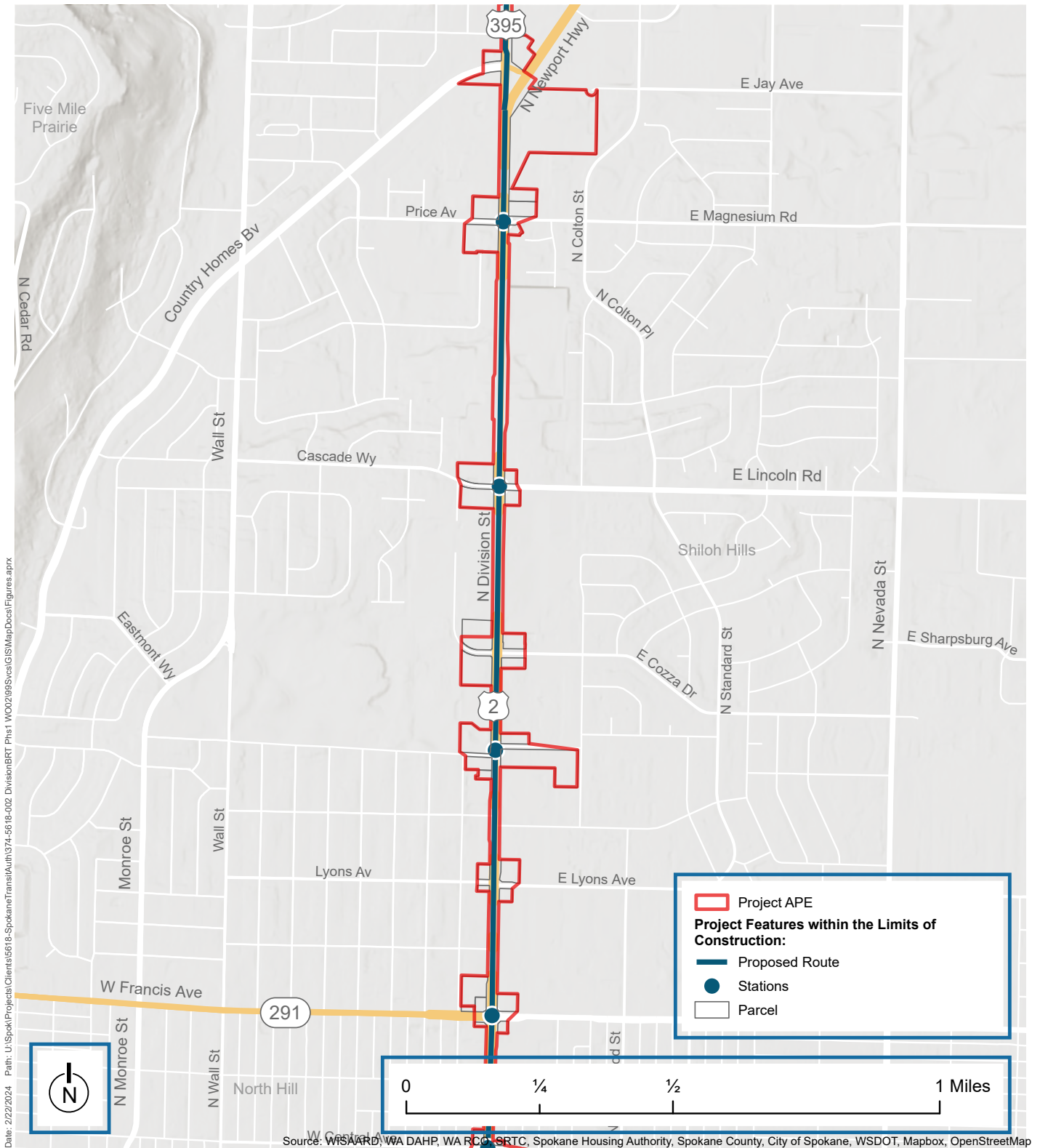
Thomas Bonetti  
Environmental Protection Specialist  
U.S. DOT Volpe National Transportation Systems Center

cc: Don Skillingstad, Senior Project Manager, Spokane Transit  
Brian Jennings, Deputy Director for Community Development, Spokane Transit  
Karl Otterstrom, AICP, Chief Planning and Development Officer, Spokane Transit

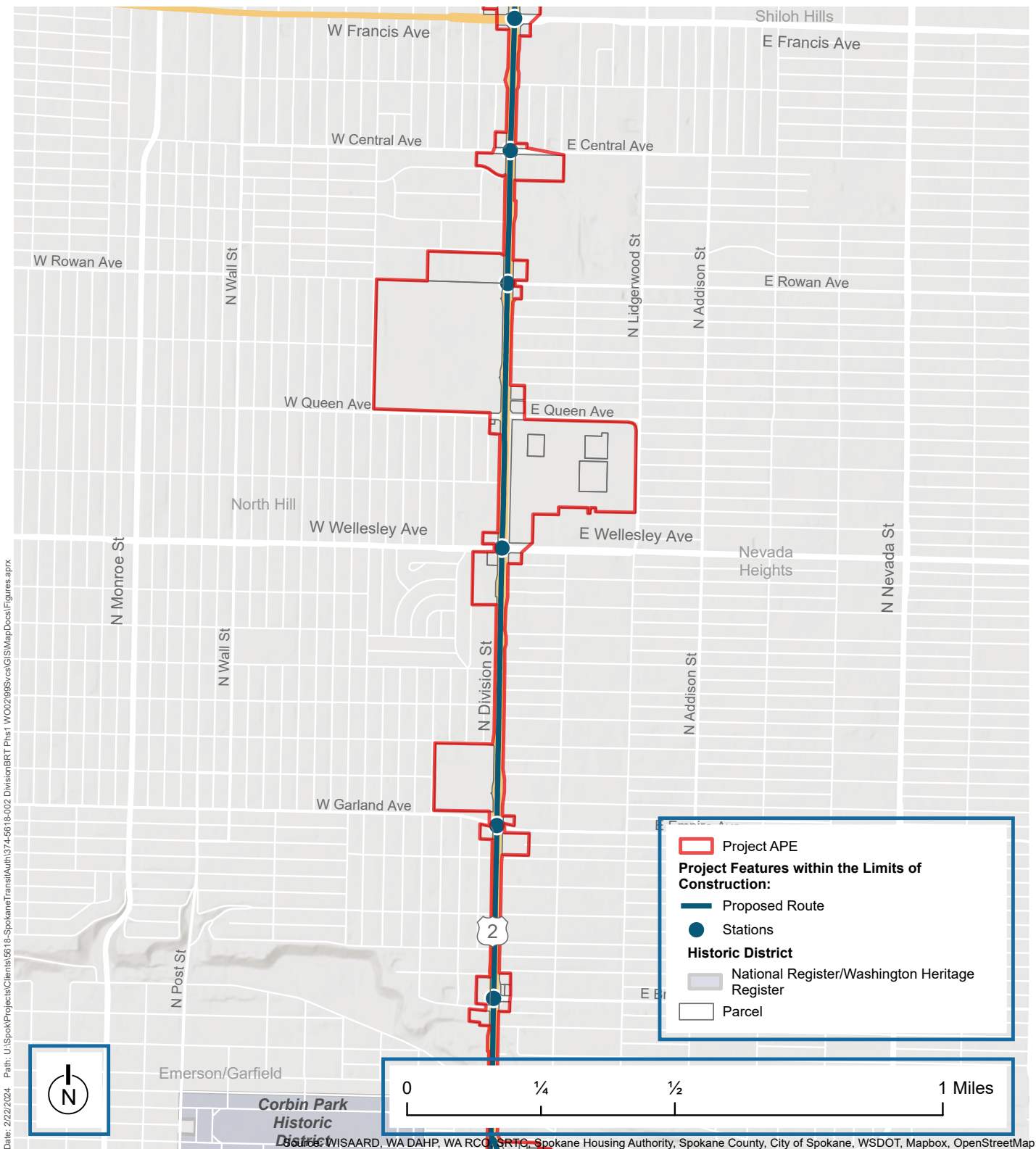








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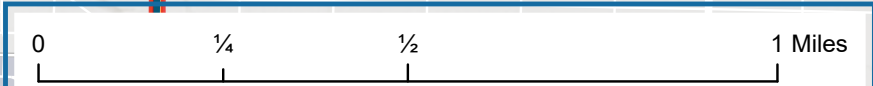
**Project APE**

**Project Features within the Limits of Construction:**

- Proposed Route
- Stations

**Historic District**

- National Register/Washington Heritage Register
- Parcel

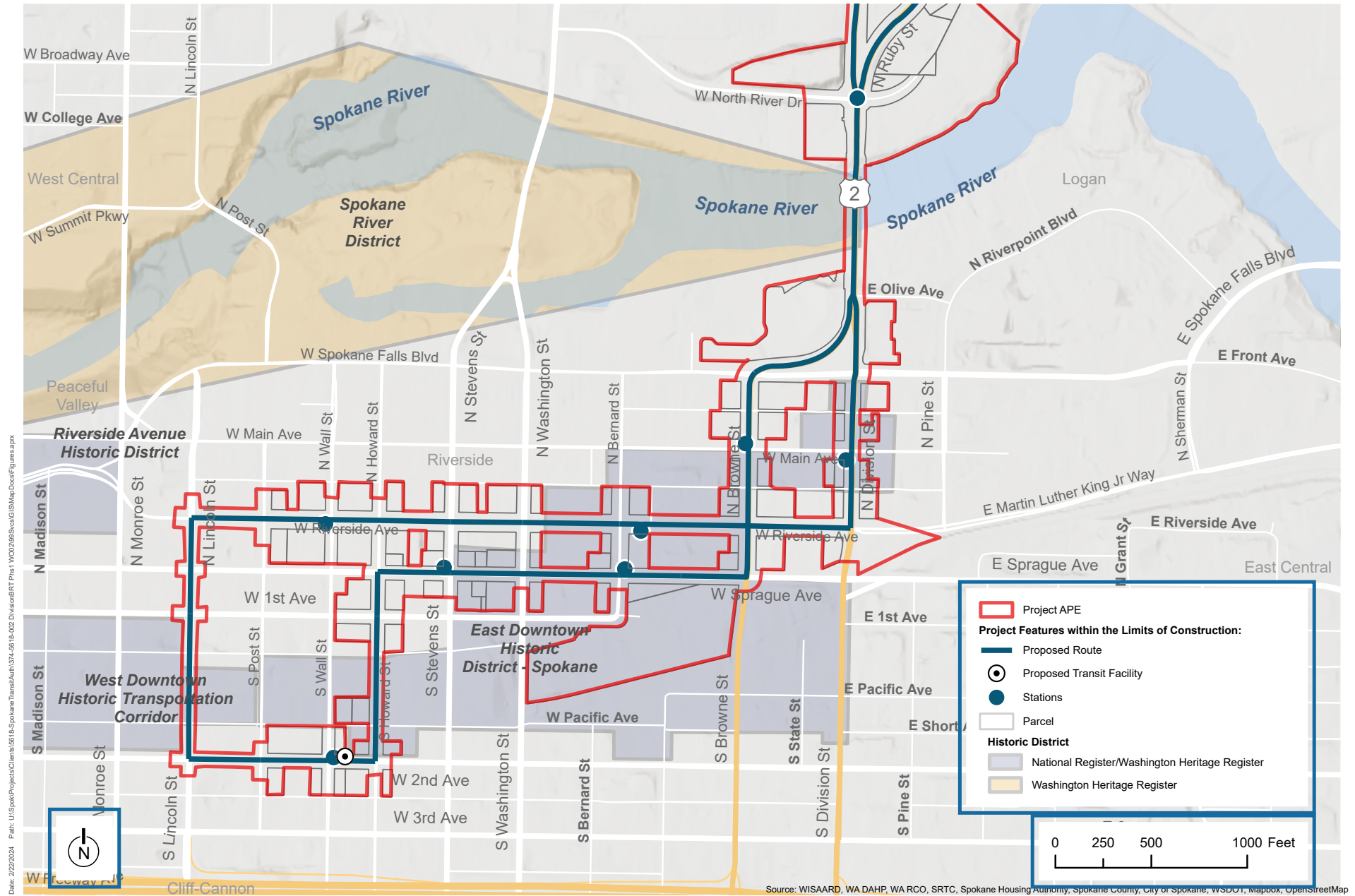


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**Figure B-6. South Portion of the APE**



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Source: WISAARD, WADAHP, WA RCO, SRTC, Spokane Housing Authority, Spokane County, City of Spokane, WSDOT, mapbox, openstreetmap