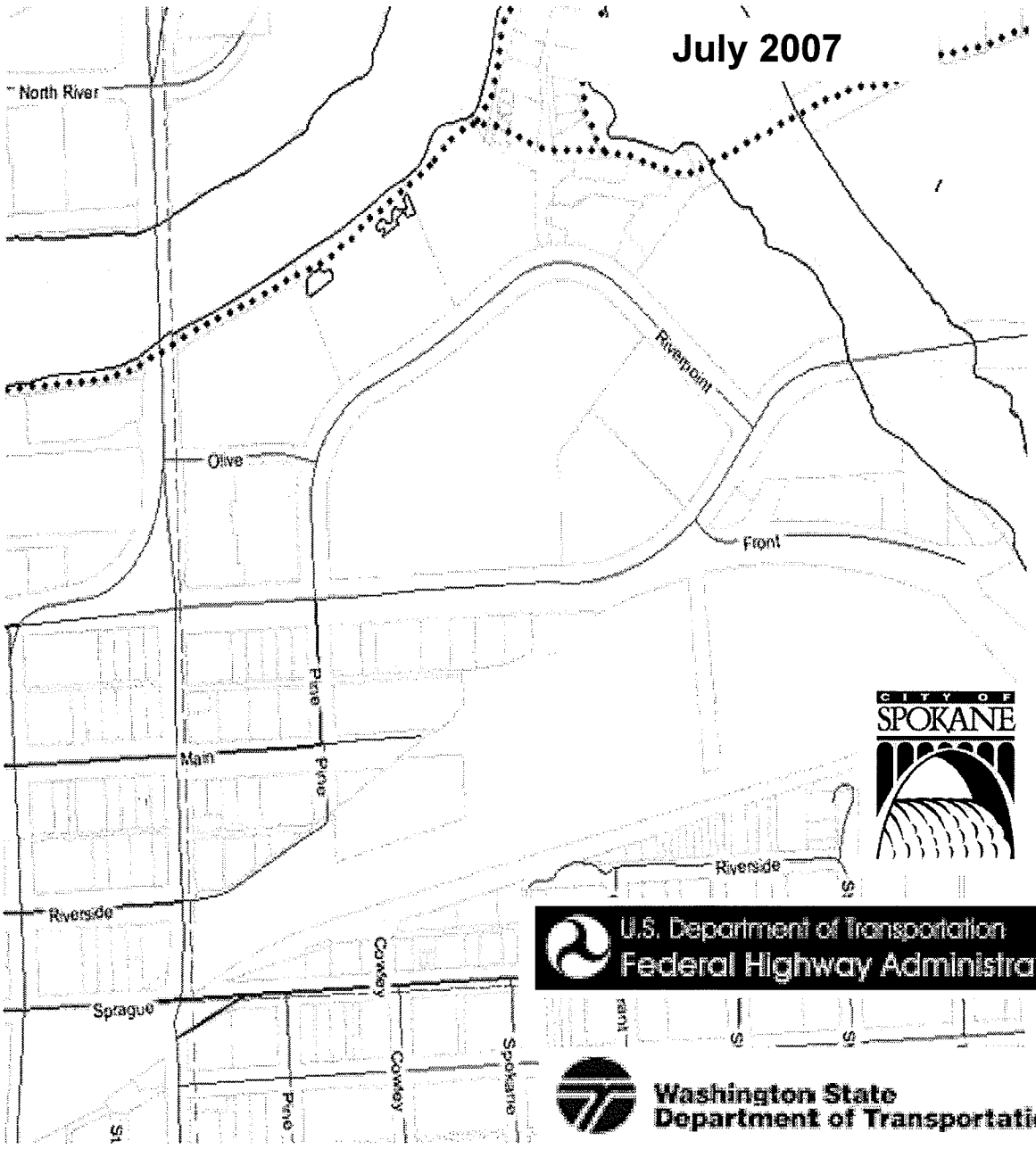
DRAFT SECTION 4(f) EVALUATION

RIVERSIDE DRIVE

Division Street to Spokane Falls Boulevard
Project Number 2004047



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Division Street to Spokane Falls Boulevard
Project Number 2004047

Submitted pursuant to 42 U.S.C. 4332(2)(c) and 49 U.S.C. 303 by
City of Spokane
Department of Engineering Services

July 2007

Date of Approval _____

_____
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Table of Contents

Abbreviations ..... **v**
CHAPTER 1 DESCRIPTION OF THE PROPOSED PROJECT **1**
A. Introduction – Phases 1 And 2 1
B. Purpose And Need 2
C. University District Master Plan 4
D. University District Transportation Plan 5
CHAPTER 2 INTRODUCTION TO ALTERNATIVES **7**
A. Basic Requirements Of Section 4(f) 7
B. Section 4(f) Resource(S) Used Or Affected 7
C. Alternatives That Would Avoid Section 4(f) Resource(s) 10
D. Alternative That Would Minimize Disturbance Of Section 4(f) Resource(s) 10
E. Alternative That Would Use Section 4(f) Resource(s) 10
CHAPTER 3 DESCRIPTION OF EACH SECTION 4(f) PROPOSED PROPERTY ... **15**
A. Map Identifying Relationship Of The Alternatives To The Section 4(f) Property 15
B. Size And Location Of The Affected Section 4(f) Properties 15
C. Type Of Property & Ownership 15
D. Access And Usage 16
E. Relationship To Other Similarly Used Lands In The Vicinity 16
F. Applicable Clauses Affecting Ownership 17
G. Characteristics That Reduce Or Enhance Property Value 17
H. Land And Water Conservation Fund Act Funding 18
CHAPTER 4 ALTERNATIVES & THEIR IMPACTS **19**
A. Identify And Evaluate Alternatives Which Would Avoid The Section 4(f) Property 19
B. Identify And Evaluate Alternatives Which Minimize Disturbance To The Section 4(f) Property 27
C. The Proposed Alternative – Alignment #3 Removal Alignment 27
CHAPTER 5 COMMITMENTS **33**
CHAPTER 6 COORDINATION WITH OTHER AGENCIES **34**
A. State Historic Preservation Officer (SHPO) 34
B. Local Officials With Jurisdiction 34
C. Historic Societies, Museums, Or Academic Institutions 34
D. Archaeological & Historic Consultant 34
E. Advisory Council On Historic Preservation (ACHP) 35
F. Indian Tribes 35
CHAPTER 7 SUMMARY **36**

Appendices

Appendix A
- Route Jurisdiction

Appendix B
- Archeological and Historical Report
- Department of Archaeology & Historic Preservation Response
- ACHP Letter (2-15-06)
- Memorandum of Agreement

Appendix C
- City of Spokane June 16, 2005 letter
- SIRTI August 12, 2005 letter
- WSU August 27, 2005 letter
- STA July 27, 2005 letter
- WSDOT February 28, 2005 letter
- WSU February 28, 2006 e-mail

Appendix D
- South Valley Corridor Project DEIS, section 3.8

Appendix E
- Qualitative Cultural Resource & Geotechnical Evaluations of Phases 2 & 3

Figures and Tables

		Page
Figure 1	Vicinity Map	3
Figure 2	Campus Buildings	9
Figure 3	Avoidance Alternative #1 - Alignment #1 Avoidance Alignment	11
Figure 4	Avoidance Alternative #2 - North River Drive	12
Figure 5	Avoidance Alternative #3 - O'Keefe Bridge/Sprague	13
Figure 6	Proposed Alternative – Alignment #3 Removal Alignment	14
Figure 7	WSU Campus Master Plan	21
Table 1	Comparison of Feasibility & Prudence of Alternatives	31

Abbreviations

ACHP	Advisory Council on Historic Preservation
ADT	Average Daily Traffic
CCS	Community Colleges of Spokane
CE	Categorical Exclusion
DAHP	Department of Archeological & Historical Preservation
EWU	Eastern Washington University
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
GU	Gonzaga University
HABS	Historical American Buildings Survey
HCT	High Capacity Transit
IAC	Interagency Committee for Outdoor Recreation
MOA	Memorandum of Agreement
NRHP	National Register of Historic Places
POG	Planning and Organization Group
ROW	Right of Way
SDES	Spokane Department of Engineering Services
SHPO	State Historical Preservation Officer
SIRTI	Spokane Intercollegiate Research and Technical Institute
STA	Spokane Transit Authority
WSDOT	Washington State Department of Transportation
WSU	Washington State University

CHAPTER 1 DESCRIPTION OF THE PROPOSED PROJECT

A. Introduction – Phases 1 And 2

Phase 1
The City of Spokane proposes to extend Riverside Avenue from Division Street to Spokane Falls Boulevard. Portions of the proposed route are in existing streets. Riverside exists between Division and Pine. Pine exists between Main and Riverside. There is no public street east of Pine; however, there is a large concrete area that is being used by vehicles for access. This concrete area was formerly used by the railroad for loading and unloading large trucks.

Phase 1 is largely funded and in the preliminary design stage. Refer to Figure 1. Other transportation facilities and important area boundaries are as noted on Figure 1.

Phase 2/3
At some future date, the City envisions a phase 2 of this Riverside extension project which would consist of extension of the phase 1 Riverside extension to the east to connect to Trent Ave. The associated phase 3 connects phase 2 with the existing Sprague Ave. arterial.

Construction funding has not been secured for this phase 2/3 work and, at this point, these phases are conceptual in nature. Nevertheless, consultants have been hired to evaluate potential geotechnical/contamination issues and to perform a cultural resource survey in the phase 2/3 project area. A summary of the qualitative assessment is as follows. Refer also to Appendix E.

Cultural Resource Assessment (quotes from consultant report)
- "There is some potential for pre-historic archaeological resources…The probability of identifying intact pre-historic cultural resources is greatly minimized, however, by extensive ground disturbing activities that have occurred as a result of industrial use, railroad and road construction, building construction and asphalt surfacing" over the last 100+ years.
- There are a variety of buildings eligible for listing on the NRHP along phase 2 of the project. Because of the large area available, the phase 2 alignment can be chosen to miss such buildings.
- There are a variety of buildings eligible for listing on the NRHP along phase 3 of the project. Phase 3 consists of construction within existing roadways and, therefore, such buildings would not be disturbed.
- A quantitative cultural resource survey is underway.

Geotechnical/Contamination Assessment (quotes from consultant report)
- Due to extensive prior industrial/railroad use, areas of contamination exist.
- "Based on a review of available information on file, it does not appear that the portions of the proposed Riverside Avenue realignment extending through phase 2 and phase 3 properties will encounter environmental impacts that would prevent or present a major obstacle to construction. No properties with substantial environmental impacts were identified with the exception of the Hamilton Street Bridge Site within the phase 2 area. However, the environmental conditions and deed restriction associated with this site do not appear to present an obstacle to construction. Construction of a paved road surface appears consistent with the site's deed restrictions, and may in fact promote the efforts of the cleanup action by reducing infiltration where contaminated soil is present. Stormwater runoff for the new roadway will need to be managed in accordance with the deed restrictions, and the final

grade of the road should be designed to limit excavation in the area where impacted soil is present."

B. Purpose And Need

The purpose for this project is to improve the safety of the existing Spokane Falls Blvd. for all forms of transportation, to reduce pedestrian conflicts within the campus which result from the arterial traffic flow through the middle of campus, to divert through traffic from Spokane Falls Blvd to an alternate route and to enhance Spokane Falls Blvd. for pedestrians and bicyclists. A secondary purpose is to assist in the economic development of this area.

This project is needed because Spokane Falls Blvd. a major City arterial with approximately 9,800 ADT bisects the college campus. Such a bisection results in the need for a large portion of the 3,000± students walking or biking from one building to the other to cross this arterial. In terms of the secondary economic development purpose of the project, the project is needed to stimulate development of the somewhat rundown area surrounding the campus.

Phase 1 of the project will satisfy this project purpose/need. Following phase 1 construction, essentially all WSU property will be on one side of this major City arterial. One WSU building, nevertheless, will remain on the other side of City arterial.

Phase 2/3 of the project would route the arterial to the east such that all WSU buildings would be on the same side of the City arterial.

C. University District Master Plan

The City of Spokane has created the University District in downtown Spokane. This effort was lead by the City of Spokane Mayor's Office of Economic Development. The University District Strategic Master Plan process also included the participation of leaders from throughout the community.

This planning effort was a public process. A consultant team was hired to develop the community workshops to ensure that the City of Spokane solicited wide, diverse, and continuous community input that would help produce a plan of the people grounded in economic reality.

To this end, four community workshops were held beginning March 31, June 19, September 27, and ending November 30, 2004. Over one thousand citizens participated in the workshops or were involved in the numerous outreach and community organization presentations. The workshops were run as charrettes, which allowed lively, energetic and overwhelmingly positive participation by all of the attendees. The final plan was adopted by the Spokane City Council on September 19, 2005.

The University District Master Plan represents a fundamental shift in the pursuit of economic development for the City of Spokane and the region. The University District Master Plan was developed as a holistic plan that addresses economic development issues, urban growth, environmental restoration, transportation and housing needs. It builds upon and incorporates existing plans, activities and assets – leveraging them into a strong economic engine that lays the foundation for Spokane's growth and a legacy for generations to come.

The University District's proximity to downtown, the medical district, mature residential neighborhoods, the Spokane River and an underdeveloped urban business district offers the opportunity to create a vibrant place that can attract a critical mass of top students, staff and faculty, cutting-edge researchers, and creative entrepreneurs – all of which are the catalysts for growth in the technology and health care industry, and overall economic prosperity for the city and the region.

The University District will provide important and needed education and training opportunities for citizens, and enhance the region's research capability. It builds on the existing Riverpoint Campus and education base, which includes Washington State University (WSU), Eastern Washington University (EWU), Gonzaga University (GU), the Community Colleges of Spokane (CCS), and the Spokane Intercollegiate Research and Technology Institute (SIRTI). Some 15,000 students and faculty are anticipated at the downtown campus, along with student and facility housing, retail, and other commercial uses.

The University District provides a unique opportunity to incorporate this mixed use with the key industry clusters of higher education and health care industries. These two industries account for two thirds of our region's economy.

D. University District Transportation Plan

Trent Avenue was a Principal Arterial on the Washington State Department of Transportation (WSDOT) road network. On May 2, 2005, a Route Jurisdiction Transfer was approved to move this portion of SR 290 from the Washington State Department of Transportation to the City of Spokane. Along with the Route Jurisdiction Transfer, the roadway was renamed Spokane Falls Boulevard. The entire text of the route jurisdiction transfer is included in Appendix A.

Over the past years, the traffic on this segment of SR 290 has changed with the industrial uses giving way to the City of Spokane's University District.

These changes created the need for a much more pedestrian friendly facility than can be reasonably accommodated by a high capacity arterial. The University District is intended to be a contained, campus-like area that encourages pedestrian and bicycle traffic. The through traffic on Spokane Falls Boulevard conflicts with pedestrian and bicycle traffic using the campus. These conflicts do not support the goal of enhancing pedestrian safety and mobility within the University District.

As can be seen on Figure 1, the WSU Riverpoint Campus is divided by existing Spokane Falls Boulevard. The proposed project identified to solve the problems with Trent and other issues was the eastward extension of Riverside Avenue. This project is intended to move the through traffic out of the middle of the University District and onto Riverside Avenue, which will be a newly rebuilt street. This eastward Riverside Avenue extension includes multi-modal options such as light rail.

The University District Plan includes a transportation element. This transportation element includes light rail as an integral part of this transportation element. There will be no student housing provided within the University District. The University District is intended to be a densely developed campus with limited automobile parking. Students coming to the University District will need to rely on mass transit alternatives, such as bus or light rail, for transportation to and from the University District. Therefore, light rail is an integral part of the University District Master Plan.

The Spokane Region has been considering high capacity transit (HCT) for years. Recently, the Spokane Transit Authority (STA) secured Federal Transit Authority funds to develop and evaluate HCT alternatives for Spokane. This study resulted in STA publishing a Draft Environmental Impact Statement (DEIS). The DEIS was signed by the Federal Transit Administration Regional Administrator on December 29, 2005. This DEIS is currently out for review and comment.

The DEIS signature page and section 3.8, Historic, Cultural, and Parkland Resources are included in Appendix D. Figure 3.8-1C shows that all the alternative routes referenced in the DEIS follow the Riverside Extension Alignment. Therefore, no matter what route is selected, light rail will follow the proposed Riverside Avenue from Division Street to Spokane Falls Boulevard alignment. Therefore, light rail will be treated as a planned and programmed project.

This project will move the major through traffic out of the heart of the University District to a new alignment at the south edge of the WSU campus. The new alignment will be an extension of Riverside Avenue from Division to Spokane Falls Boulevard at its intersection with Riverpoint Boulevard. This new facility is what will allow Spokane Falls Boulevard to be downgraded from a principal arterial to a collector arterial. This downgrading facilitates construction of desired

pedestrian, bicycle, and other enhancements along Spokane Falls Boulevard appropriate to the campus setting.

Once the project is accomplished, it will separate the campus vehicular and pedestrian traffic from the higher volume through traffic. This new road will resolve the enhancement and pedestrian safety concerns.

CHAPTER 2 INTRODUCTION TO ALTERNATIVES

A. Basic Requirements Of Section 4(f)

Section 4(f) of the Department of Transportation Act of 1966, codified in Federal law at 49 U.S.C. §303, declares that "It is the policy of the United States Government that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites."

Section 4(f) specifies that "The Secretary [of Transportation] may approve a transportation program or project... requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State or local significance, or land of an historic site of national, State or local significance (as determined by the Federal, State or local officials having jurisdiction over the park, area, refuge or site) only if -

1. there is no feasible and prudent alternative to the use of such land, and
2. the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use."

Section 4(f) further requires consultation with the Department of Interior and, as appropriate, the involved offices of the Departments of Agriculture and Housing and Urban Development in developing transportation projects and programs which use lands protected by section 4(f).

B. Section 4(f) Resource(s) Used Or Affected

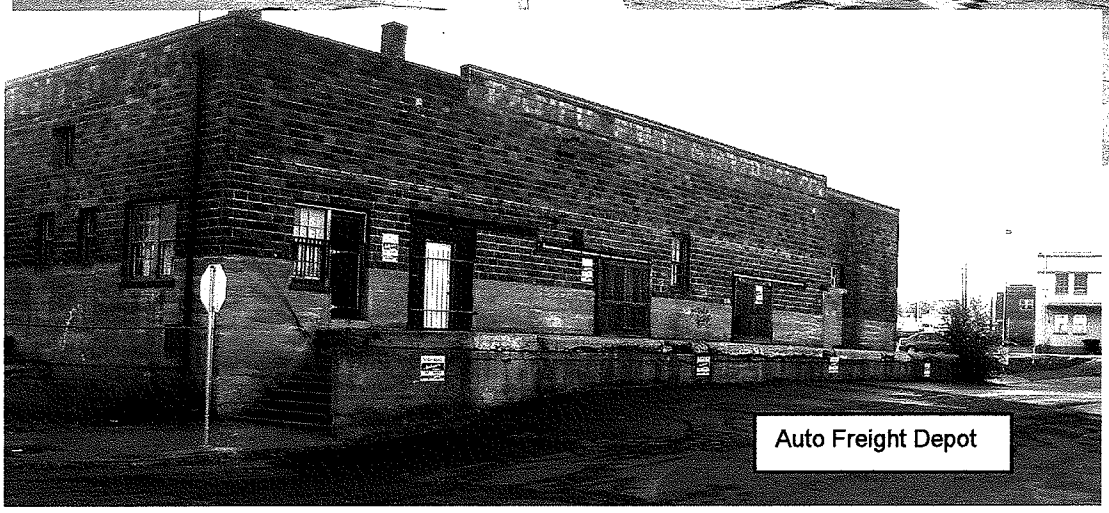
The section 4(f) resources used or affected are:

1. Ryan Fruit and Produce Company warehouse, and
2. Piggly Wiggly/Safeway/R.S. Gordon warehouse, and
3. Auto Freight Depot

The buildings themselves are shown on the following page and their locations are shown on Figure 2.

Piggly Wiggly/Safeway/
R.S. Gordon

Ryan Fruit & Produce Co.


Auto Freight Depot

C. Alternatives That Would Avoid Section 4(f) Resource(s)

Three alternatives were considered that would avoid the Section 4(f) resources. Note that figure names used in prior discussions and correspondence with stakeholders have been retained in this report so that historic correspondence contained in the appendix which references these figure titles makes sense.

Avoidance Alternative #1 - the first avoidance alignment is shown in Figure 3 which is entitled "Avoidance Alternative - Alignment #1 - Avoidance Alignment". It consists of the extension of Riverside Ave. to the north of the RR tracks with the Riverside extension veering just north of the 4(f) properties.

Avoidance Alternative #2 - the second avoidance alignment is shown in Figure 4 which is entitled "Avoidance Alternative #2 - North River Drive Alignment". It consists of an arterial north of the river through the Gonzaga University campus

Avoidance Alternative #3 - the third avoidance alignment is shown in Figure 5 which is entitled "Avoidance Alternative #3 – Okeefe Bridge/Sprague". It consists of use of Sprague Avenue with construction of on/off ramps from Sprague to the O'Keefe Bridge.

These alternatives are described in more detail in a chapter 4.

D. Alternative That Would Minimize Disturbance Of Section 4(f) Resource(s)

Minimize Disturbance Alternative – this alternative is identical to Avoidance Alternative #3 except that it would use (i.e., require removal) of the Piggly/Wiggly/Safeway/R.S. Gordon warehouse while leaving the Ryan Fruit & Produce Co. warehouse intact. This alternative does not have an associated figure for reasons described in chapter 4.

E. Alternative That Would Use Section 4(f) Resource(s)

Proposed Alignment - the alternative under consideration that would use the Section 4(f) resources is shown in Figure 6 entitled "Proposed Alignment- Alignment #3 Removal Alignment".

This alternative is described in more detail in a chapter 4.

CHAPTER 3 DESCRIPTION OF EACH SECTION 4(f) PROPOSED PROPERTY

A. Map Identifying Relationship Of The Alternatives To The Section 4(f) Property

Each of the figures for the various alternatives briefly described above shows the location of the three Section 4(f) properties in relation to that alternative.

B. Size And Location Of The Affected Section 4(f) Properties

The Ryan Fruit and Produce Company warehouse is a two story rectangular brick warehouse approximately 260 feet long and 60 feet wide, and contains 15,600 square feet. Its address is 20 E. Riverside Avenue, Spokane, WA. It is located near Division Street and is adjacent to the Burlington Northern Santa Fe Railroad tracks.

The Ryan Fruit and Produce Company warehouse and the Piggly Wiggly/Safeway/R.S. Gordon warehouse share a common wall.

The Piggly Wiggly/Safeway/R.S. Gordon warehouse is a two story rectangular brick warehouse approximately 300 feet long and 60 feet wide, and contains 18,000 square feet. Its address is 28 E. Riverside Avenue, Spokane, WA. It is located directly east of the Pacific Fruit and Produce Company warehouse and is adjacent to the Burlington Northern Santa Fe Railroad tracks.

The Auto Freight Depot warehouse is a one story triangular brick and concrete warehouse. Its address is 102 E. Main Street Avenue, Spokane, WA. It is located at the southeast corner of Pine Street and Main Street.

The location of these three buildings is shown on Figure 2.

C. Type Of Property & Ownership

The archeology and historical report entitled "*A Cultural Resources Survey of the University District Safety Enhancement Project, Spokane County, Washington*" is included in Appendix B. This archeology and historical report contains additional information not covered below.

The Ryan Fruit and Produce Company warehouse was constructed in 1928 for use as a refrigerated warehouse on land leased from the Northern Pacific Railroad (currently Burlington Northern Santa Fe Railroad). It is eligible for listing on the national Register of Historic Places under Criterion 'A,' for its association with industrial rail transportation and commerce during the development of Spokane. The boundary of the designation is the building foundation. The property is now owned by WSU and is vacant.

The Piggly Wiggly/Safeway/R.S. Gordon warehouse was constructed in 1927 for use as a grocery warehouse on land leased from the Northern Pacific Railroad (currently Burlington Northern Santa Fe Railroad). It is eligible for listing on the national Register of Historic Places under Criterion 'A,' for its association with industrial rail transportation and commerce during the development of Spokane. The boundary of the designation is the building foundation. The property is now owned by WSU. It is leased to Interdecor, an interior furnishings wholesaler.

The Auto Freight Depot warehouse was constructed in 1922 for use as an auto freight terminal on land leased from the Northern Pacific Railroad. It is eligible for listing on the National Register of Historic Places under Criterion 'A,' for its association with industrial rail transportation and commerce during the development of Spokane. The boundary of the designation is the building foundation. The property is now privately owned. The property is no longer actively used and is now vacant and boarded up.

D. Access And Usage

The Ryan Fruit and Produce Company warehouse has no access to pedestrians. The building is locked and vacant. There are no users/visitors. Access to the loading docks by trucks is available.

The Piggly Wiggly/Safeway/R.S. Gordon warehouse does have access to pedestrians. There are loading docks on the front of the building that are used to load the interior furnishings into the warehouse, or onto trucks for distribution to retail stores. The business in the building, Interdecor, is a wholesale business. They service approximately 5 to 10 trucks per day. They also have about 10 drive in customers per day who come to view the interior furnishings.

These two warehouses share a common wall. The railroad spur that used to be available on the south side of both warehouses has been removed. Therefore, railroad access to both these warehouses is no longer available.

The Auto Freight Depot warehouse property is no longer actively used and is now vacant and boarded up. Vehicular access is afforded by Main Avenue. However, access to the loading dock is not available. Trucks using the loading dock would block Pine Street, which is not allowed under the Spokane Municipal Code. There are no users/visitors to the Auto Freight Depot warehouse.

E. Relationship To Other Similarly Used Lands In The Vicinity

The Ryan Fruit and Produce Company warehouse and the Piggly Wiggly/Safeway/R.S. Gordon warehouse are now owned by WSU. WSU also owns most of the other land in the vicinity. These properties are slated for expansion of the WSU – EWU higher education campus. These buildings are intended for removal in the future under the campus master plan. A Feb. 28, 2006 e-mail from WSU officials (Appendix C) states, '...Should the lease continue to its expiration date, WSU fully intends to require the current lesee to remove their buildings and improvements from the site, and to restore the premises to their original unimproved condition.' The master plan indicates a roadway and light rail at this location.

WSU recently sold the vacant property immediately north of these two warehouses to SIRTI to build a research building. The SIRTI building, immediately to the north of the warehouses, is nearly complete.

WSU is currently working with a leasing company to find developers to lease other parcels in the immediate vicinity, and construct buildings that will support the WSU campus.

WSU has tried to purchase the Auto Freight Depot building to include in the campus. To date these negotiations have not been successful.

F. Applicable Clauses Affecting Ownership

The Ryan Fruit and Produce Company warehouse and the Piggly Wiggly/Safeway/R.S. Gordon warehouse are built on land now owned by WSU. WSU also owns the Ryan Fruit and Produce Company warehouse building. Interdecor owns the Piggly Wiggly/Safeway/R.S. Gordon warehouse building. Interdecor must remove the building at the end of their lease. A February 28, 2006 e-mail (Appendix C) from WSU officials states '...Should the lease continue to its expiration date, WSU fully intends to require the lesee to remove their buildings and improvements from the site, and to restore the premises to their original unimproved condition.' The lease also states that Interdecor can give the building to WSU, at WSU's option.

Interdecor's current lease expires on December 31, 2009. Interdecor has the option of extending the lease for five additional years, to December 31, 2014.

The Ryan Fruit and Produce Company warehouse is mostly vacant. Interdecor is leasing the east 500 square feet of this warehouse adjacent to the Piggly Wiggly/Safeway/R.S. Gordon warehouse. Interdecor's lease on these 500 square feet expires on October 31, 2007, and has no future option.

The Piggly Wiggly/Safeway/R.S. Gordon warehouse ground lease also contains language regarding eminent domain. The lease states "If the whole of the Premises shall be acquired or condemned by eminent domain for any public or quasi-public use or purpose, or if part of the Premises shall be so acquired or condemned to the extent that LESSEE cannot reasonably conduct its business therein, then the term of this Lease shall terminate and cease as of the date title or possession shall be transferred in such proceeding, whichever shall first occur, and all rental shall be paid up to that date and LESSEE shall have no claim against LESSOR for the value of the unexpired term of the lease."

The Auto Freight Depot warehouse property is no longer actively used and is now vacant and boarded up. There is no lease.

G. Characteristics That Reduce Or Enhance Property Value

The Ryan Fruit and Produce Company warehouse roof leaks, therefore, nothing subject to water damage can be stored in the building. Interdecor has repaired the portion of the roof over their leased space.

The Piggly Wiggly/Safeway/R.S. Gordon warehouse has been retrofitted inside to allow the movement and storage of large rolls of carpet.

A portion of the Auto Freight Depot warehouse is located on the SIRTI property. The loading dock for the warehouse is located in the Pine Street right of way. There are no agreements granting rights for the loading docks on the public right of way. If the Pine Street connection is constructed, sidewalk on the east side of the street would not be included in the project, in order to avoid the loading dock. Excluding sidewalk would violate the City of Spokane Comprehensive Plan and adopted street standards which would require a variance. An additional variance would be required since the loading dock would be in the clear zone.

H. Land And Water Conservation Fund Act Funding

None of the WSU property was acquired using funds from the Land and Water Conservation Fund Act of 1965, administered by the IAC. The Auto Freight Depot was acquired using private funds, and Land and Water Conservation Funds were not involved.

CHAPTER 4 ALTERNATIVES & THEIR IMPACTS

From above, figure names used in prior discussions and correspondence with stakeholders have been retained in this report so that historic correspondence contained in the appendix which references these figure titles makes sense.

A. Identify And Evaluate Alternatives Which Would Avoid The Section 4(f) Property

Avoidance Alternative #1

Description
This alignment is shown in Figure 3 which is entitled "Avoidance Alternative #1 - Alignment #1 – Avoidance Alignment". This alignment would curve the proposed Riverside extension north around the Ryan Fruit and Produce Company, and the Piggly Wiggly/Safeway/R.S. Gordon warehouses.

The Riverside right of way is widened to include space for light rail since it is a planned and programmed improvement on this alignment.

The Proposed Alternative (see Figure 6) and this Avoidance Alternative #1 (see Figure 3) are identical from station 11+80± east to the end of the project (i.e. to the east of the SIRTI parking lot).

Pine Street would be constructed between Riverside Avenue and Main Street. The loading dock for the Auto Freight Depot is inside the existing Pine Street right of way. The construction of sidewalk would not be included on the east side of Pine Street between Riverside Avenue and Main Street, in an effort to avoid the Auto Freight Depot loading dock.

Impacts
Interdecor is the home furnishing business located in the Piggly Wiggly/Safeway/R.S. Gordon warehouse. Semi-trucks currently park perpendicular to the building to load and unload home furnishings. The back of the sidewalk would be against the buildings, eliminating access to the loading docks. This alternative would make the buildings non functional for their current use as warehouses.

This alignment does avoid the Ryan Fruit and Produce Company warehouse and the Piggly Wiggly/Safeway/R.S. Gordon warehouse. However, it restricts the access to the warehouses, as discussed above. It also has a major impact to the SIRTI parking lot and building. Access to the SIRTI building is negatively affected, and parking loss is substantial.

In addition, preservation of this building results in a strip of WSU property isolated on the other side of the new Riverside extension arterial. A primary rationale for the project is to avoid, to the extent possible, a City arterial dividing the WSU campus. Preservation of this building would result in just such a division.

Both the Proposed Alternative (see Figure 6) and this Avoidance Alternative #1 (see Figure 3) were presented to WSU, SIRTI, and STA. Responses of those agencies are included in Appendix C. An overview of those responses is as follows:

SIRTI Response to Avoidance Alternative #1

SIRTI does not believe that Avoidance Alternative #1 (see Figure 3) is feasible because it eliminates their present driveway access from either Pine Street or Riverside Avenue. The curvilinear alignment required to avoid the warehouses would require the street to be constructed through the SIRTI parking lot. Construction of an arterial through the SIRTI parking lot would eliminate 36 of the 57 parking stalls. There is no land available to replace these stalls.

In addition, semi-trucks now need to maneuver through the parking area in order to reach the building's loading docks. Eliminating parking area would severely restrict the area available in which to make these maneuvers. In addition, there is no public road around the north or east side of the SIRTI building. The property on the north or east side is private property and SIRTI does not have an access easement over that property. The private property owner is WSU, and they are trying to develop their property. WSU does not want to encumber their property by granting with an access easement to SIRTI.

The SIRTI board unanimously voted at their June 29, 2005 meeting that Avoidance Alternative #1 (see Figure 3) is not feasible and prudent.

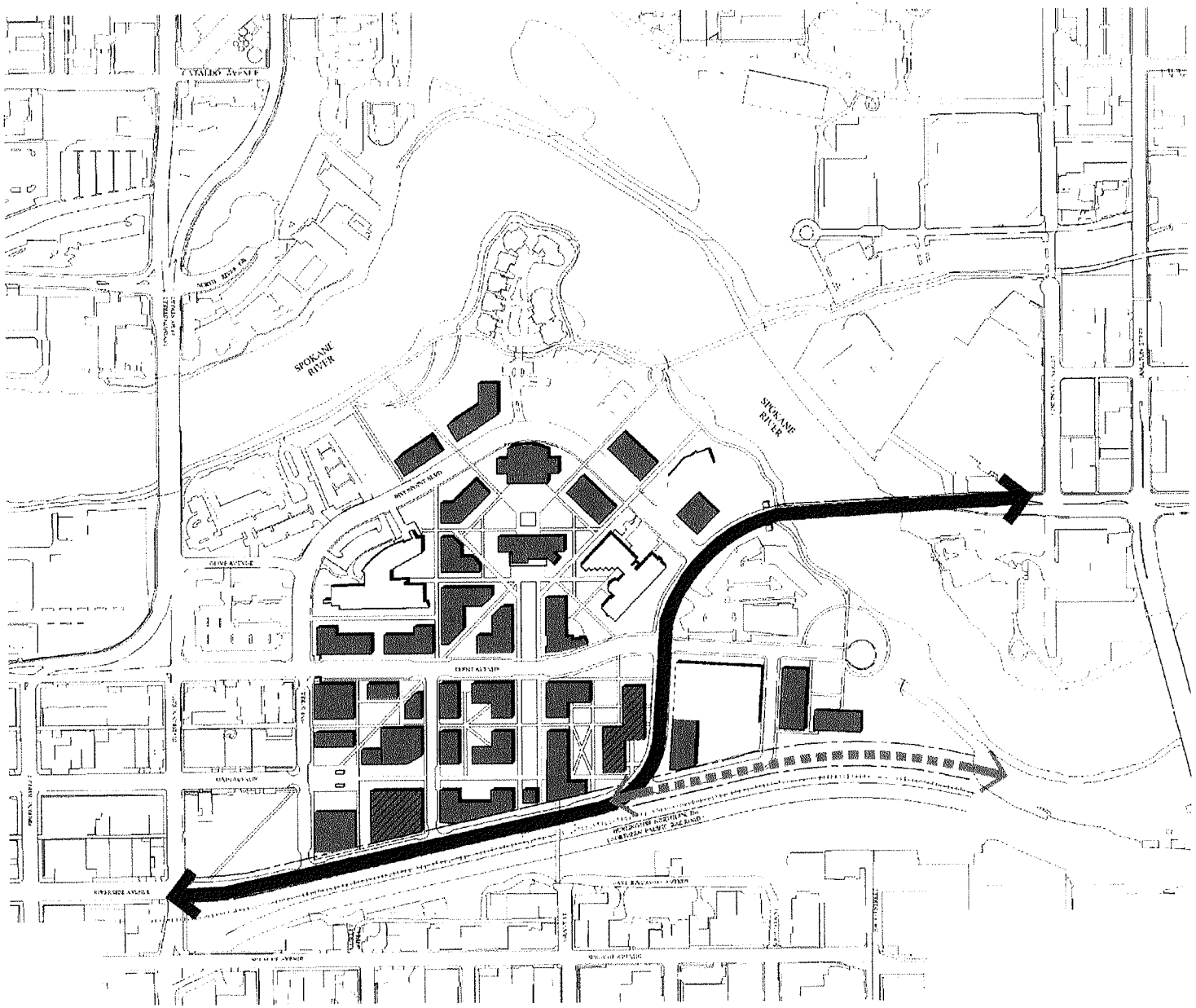
WSU Response to Avoidance Alternative #1
WSU comments that Avoidance Alternative #1 (see Figure 3) conflicts with the WSU master plan (see Figure 8 on following page). This alignment separates a parcel of land from the rest of campus. Riverside will become a major east/west arterial connecting downtown with Spokane to the east. This will isolate a small parcel of WSU property from the rest of campus making it relatively useless. Given the limited land available to WSU at this location, having a piece of essentially useless land is not an acceptable plan.

WSU is also concerned with Avoidance Alternative #1's impacts to SIRTI. These impacts are summarized above in the SIRTI comments discussion. WSU is a research type university, and they do not want to do anything that would inhibit research.

WSU concludes their letter with the following comment: "Alignment #1 [e.g., Avoidance Alternative #1] is not a reasonable or prudent solution because of the reasons stated above."

A separate e-mail from a WSU official dated February 28, 2006 (see Appendix C) states that at the expiration date of the Interdecor lease, WSU fully intends to require the lessees to remove their buildings and improvements from the site and restore the premises to their original unimproved condition. With plans already established by WSU to demolish the buildings, it would not be reasonable to plan around buildings that will not be there in the near future.

STA Response to Avoidance Alternative #1
The WSU master plan and the University District master plan include consideration for high capacity transit, and specifically light rail. The agency charged with light rail planning responsibility is the Spokane Transit Authority. The STA July 27, 2005 letter regarding these alignments is contained in Appendix C.



RIVERPOINT CAMPUS

Spokane, Washington

MASTER PLAN

SR290 Reconfiguration Options

Northwest Architectural Company

Walker Macy

Legend

SR-290 Alternative 'A'

SR-290 Alternative 'B'

September 2000

WSU CAMPUS MASTER PLAN	FIGURE 7

STA comments that it is feasible to retrofit light rail into a median in Avoidance Alternative #1 at some future date. However, doing this causes the Avoidance Alternative #1 right of way to grow much wider, which impacts the SIRTI building and the historic warehouses.

STA concludes their letter with the following statement: "Prudent action is required to help ensure transportation initiatives within that corridor are consistent with regional long range transportation planning efforts." STA does not feel that Avoidance Alternative #1 supports regional long range transportation planning efforts, and therefore, feels this alternative is not prudent.

Further information in this regard can be found in the STA letter contained in Appendix C.

Conclusion

Avoidance Alternative #1 is not feasible and prudent for the following reasons:

1. Severe operational or safety problems are created by separating a portion of the WSU property from the rest of the campus. This is a unique engineering and construction problem created by this alignment. This project is being undertaken to reduce the traffic impacts to bicycles and pedestrians by eliminating, to the extent possible, the existing campus separation. This alternative creates the same problem at a different location. Forcing bicycles and pedestrians to continue to cross a busy arterial is not reasonable or prudent.

2. WSU does not have enough available land in this urban setting to create an isolated and essentially useless parcel of property separated from the rest of the campus.

3. Operational impacts would be created to the SIRTI building and property by cutting off their access, and eliminating 63% of the available parking. Therefore, this alternative avoids 4(f) lands only to cause deterioration of other property. It also prevents WSU from developing their property according to their campus master plan.

4. There are also extraordinary costs created by this alternative. There is no alternate land available to replace the SIRTI parking. The loss of parking would make the brand new SIRTI building out of conformance with the City of Spokane zoning code. SIRTI would have to be compensated for this loss of parking, or a parking structure would need to be built to replace the parking. This parking structure would have to be designed to allow truck access through the parking structure. All of this would add extraordinary costs to this alternative, as well as unique engineering or construction problems.

5. There are unacceptable adverse social, economic, or environmental impacts because retrofitting light rail into the alignment (which requires widening of the necessary right of way) impacts both the new SIRTI building and the warehouses.

6. There is another truly unusual factor that influences this project. WSU plans to demolish the buildings with or without the proposed project, regardless of the selected alignment. Therefore, it would not be prudent to plan around buildings that will not be there in the near future.

Avoidance Alternative #2

Description
This alternative is shown in Figure 4 which is entitled "Avoidance Alternative #2 -"North River Drive". This alternative routes Spokane Falls Boulevard traffic north around WSU on the north side of the Spokane River. This alternative begins at North River Drive and Division and proceeds east along the north side of the river. As previously noted, the Gonzaga University campus is located immediately north of the river and east of Division. This alternative proceeds east across the Gonzaga University campus until it comes back on Spokane Falls Blvd at the existing Hamilton Street/Spokane Falls intersection.

Impacts
As seen on Figure 4, this alignment would have the following impacts:

1. Requires the removal of the eastern two wings of the River Tree Inn and Hotel (pictured on a subsequent page)
   - As seen in Figure 4, there is no alternate location for these income generating properties.
   - This is a busy hotel serving the adjacent Gonzaga University, WSU University and the Spokane Convention Center & Opera House – removal of a substantial portion of these rooms could contribute to a shortage of lodging in this university and community arts area.
2. This alignment shifts the problem of an arterial through the WSU (public university) campus to the Gonzaga (private university) campus. In addition to the safety issues associated with an arterial through a campus with heavy pedestrian traffic, this alignment would require the following removals or relocations:
   a. Requires the removal of the Schoenberg Center (pictured on a subsequent page) on the Gonzaga University campus
      - Shoenberg Center houses the nursing program, one of the only nursing programs in the area; also, the nursing facilities contains specialized equipment - movement of such equipment is both risky and expensive.
      - Gonzaga is an urban university with little to no spare land on which to relocate buildings as seen on Figure 4.
   b. Requires the removal of the Jundt Art Center and Museum (pictured on a subsequent page) on the Gonzaga University Campus.
      - the Jundt Art Center is an important community/campus resource which is not readily replaceable.
      - movement of art and historical resources in this building would put irreplaceable resources at risk during transport and temporary storage.
      - Gonzaga is an urban university with little to no spare land on which to relocate buildings.
   c. Requires a 1000' bridge across Lake Arthur on the Gonzaga University campus
      - such a bridge would damage the aesthetics of both Lake Arthur, a prominent campus resource and the adjacent Spokane River, a prominent community resource.
   d. Requires that the Centennial Trail Spokane River Bridge be extended over this alignment
      - most of the Centennial Trail through Spokane is flat thus presenting recreational opportunities to walkers/runners/bikers of widely varying abilities, construction of bridge meeting ADA slope requirements would pose unique engineering

challenges, accessing such a bridge would pose challenges to those less physically able to cross bridge up and down ramps

e. Requires the removal of the southwest end of the Gonzaga Law Center (pictured on a subsequent page) on the Gonzaga University campus
   - this building is an integral part of the only law school in Spokane; Gonzaga is an urban university with little to no spare land on which to relocate buildings;

f. Requires the removal of a portion of the Gonzaga University baseball field (not a public facility), which is nearing completion on the Gonzaga University campus
   - Gonzaga is an urban university with little to no land to relocate this large baseball field.

Conclusion

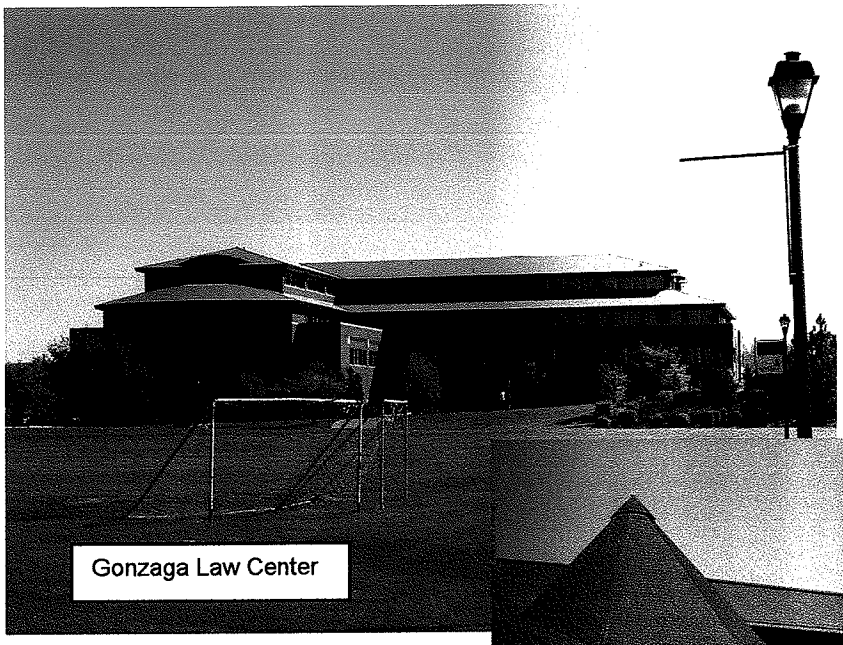
Avoidance Alternative #2 is not prudent for the following reasons:

1. Construction of an arterial through the park like setting of Gonzaga University would create community disruption of an extraordinary magnitude.

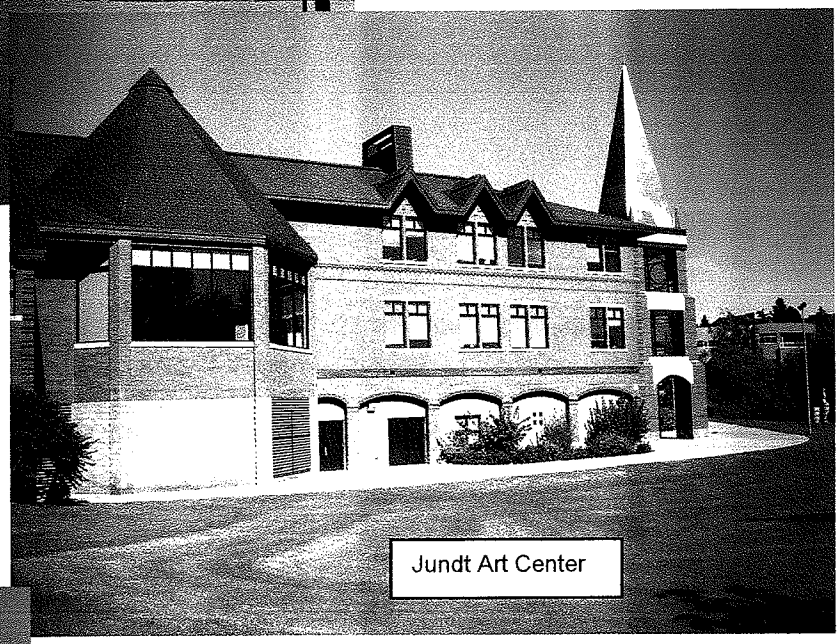
2. Removal/replacement of the buildings, baseball fields and other facilities would result in both a community disruption of an extraordinary magnitude and extraordinary costs.

3. Construction of an arterial through Gonzaga University would solve the purpose/need for the WSU campus but would create a similar need on the Gonzaga campus.

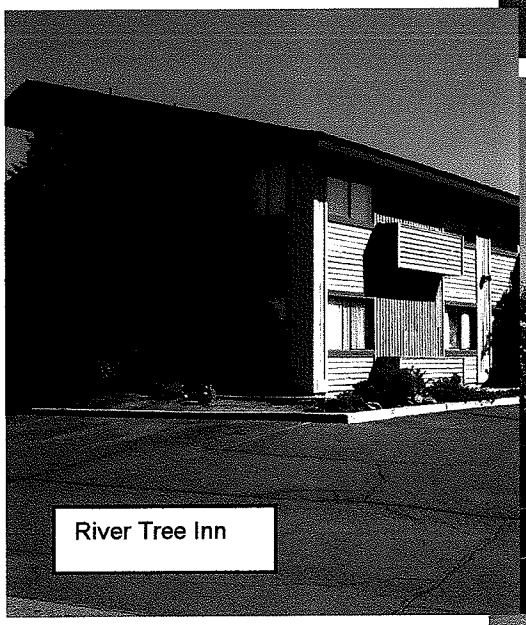
4. There is another truly unusual factor that influences this project. WSU plans to demolish the buildings with or without the proposed project, regardless of the selected alignment. Therefore, it would not be reasonable to plan around buildings that will not be there in the near future.



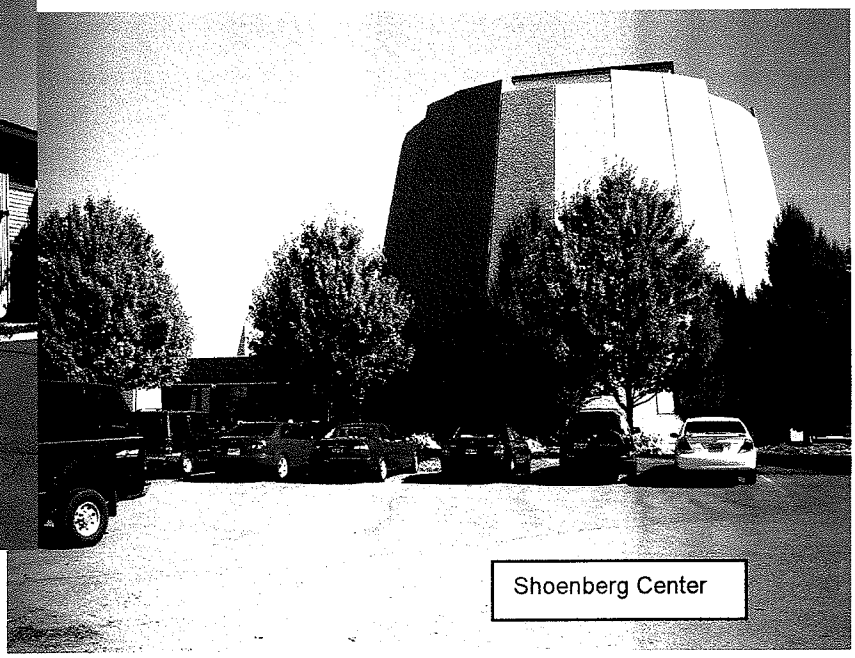
Gonzaga Law Center



Jundt Art Center



River Tree Inn



Shoenberg Center

Avoidance Alternative #3

Description
This alignment is shown in Figure 5 which is entitled "Avoidance Alternative #3 – O'keefe Bridge/Sprague". The O'Keefe Bridge currently crosses over Sprague Avenue and the Spokane River. This alignment would allow the Spokane Falls Boulevard traffic to go south around WSU on Sprague Avenue. This alignment would require that an interchange be constructed on the O'Keefe Bridge. The required interchange ramps are shown on Figure 5.

Impacts
As can be seen on Figure 5, this alignment has the following impacts:

1. An aerial on ramp from Sprague Ave. to southbound O'Keefe traffic would be required as would an aerial off ramp for southbound O'Keefe traffic to Sprague Ave.
   - The on/off ramps would go through the existing City of Spokane sewer maintenance office and garage facility. This would require that the City of Spokane sewer maintenance building be relocated at an unknown location and considerable expense would be incurred. Such a move likely would result in substantial environmental issues associated with such a maintenance facility & associated chemicals used over the years.
   - Both the on/off ramps would require long bridge structures (approx. 1000' each) over BNSFRR tracks; vital railroad traffic would be disrupted during construction at considerable expense.
   - Such a lengthy bridge structure would be result in considerable expense.

2. An aerial off ramp for northbound O'Keefe traffic to Sprague Ave. would be required
   - This off ramp would require a long bridge structure (1500') over BNSFRR tracks; vital railroad traffic would be disrupted during construction and considerable expense would be incurred.
   - Such a lengthy bridge structure would be constructed at considerable expense.

3. An on ramp from Sprague Ave. to northbound O'Keefe traffic would be required
   - This on ramp would require the removal of several business structures on the south side of Sprague including Medical Supply Co., PEMCO Insurance Building, Mountain States Electrical, and three private residences none of which have an incentive to cooperate with such an alignment and considerable expense would be incurred.

4. As seen in Figure 5, the above on/off ramps require a major footprint, would affect a large amount of property would require moving a large number of utilities, homes and businesses.

5. This alternative requires that traffic be routed onto Hamilton to the Hamilton/Trent intersection. That intersection under current traffic conditions provides level of service E with a VC ratio of 0.89. The City is currently investigating mitigation measures for this low level of service; additional traffic would not be prudent.

Conclusion
Avoidance Alternative #3 is not feasible or prudent for the following reasons:

1. Routing additional traffic to the already overloaded Hamilton/Trent intersection creates both unique engineering/construction problems and severe adverse environmental impacts. It would also create a new urgent public need.

2. The required removal of a several businesses and homes would create community disruption of an extraordinary magnitude.

3. The required construction of the various on/off ramp bridge structures would result in extraordinary costs and unique engineering/construction problems.

4. There is another truly unusual factor that influences this project. WSU plans to demolish the buildings with or without the proposed project, regardless of the selected alignment. Therefore, it would not be reasonable to plan around buildings that will not be there in the near future.

B. Identify And Evaluate Alternatives Which Minimize Disturbance To The Section 4(f) Property

Minimize Disturbance Alternative

Description
This alternative is identical to Avoidance Alternative #1 (see Figure 3) above except that the proposed Riverside extension is curved to the north only enough to avoid use (i.e., removal) of the Ryan Fruit & Produce Co. warehouse; use (i.e., removal) of the Piggly Wiggly/Safeway/R.S. Gordon warehouse would be required. Because this alternative is not feasible as described below, a separate exhibit was not prepared.

Feasibility
Because of the long radii required for light rail and the orientation of the historical warehouses relative to these radii, if the Ryan Fruit & Produce Co. warehouse is not used (i.e., saved), the Piggly Wiggly/Safeway/R.S. Gordon warehouse will also not be used (i.e., saved). That is, it is not physically feasible, given light rail design requirements, to design the Riverside extension such that only the Piggly Wiggly/Safeway/R.S. Gordon warehouse is used (i.e. removed) but not the Ryan Fruit & Produce Co. warehouse. The controlling point in design of the roadway/light rail radius is the corner of the warehouse shown on Figure 3.

This alternative is therefore not considered further. Note that even if this alternative were feasible, most of the impacts described in Avoidance Alternative #1 above would still apply as would most of WSU's objections.

C. The Proposed Alternative – Alignment #3 Removal Alignment

Proposed Alternative – Alignment #3 Removal Alignment

Description

This alignment is shown in Figure 6 which is entitled "Proposed Alternative – Alignment #3 Removal Alignment". It would require removing the Ryan Fruit and Produce Company warehouse and the Piggly Wiggly/Safeway/R.S. Gordon warehouse, as shown in Figure 6. The project starts at the intersection of Division and Riverside, and goes east until it comes to the Burlington Northern Santa Fe Railroad. It then continues northeast and parallels the railroad.

The Riverside right of way is widened to provide space for light rail. This space will be a landscaped median until it is used for light rail lines.

Impacts
Interdecor is the home furnishing business located in the Piggly Wiggly/Safeway/R.S. Gordon warehouse. This business would need to be relocated following the federal aid right of way criteria.

The purpose for this project is to improve the safety of the existing Spokane Falls Blvd. for all forms of transportation, and to enhance Spokane Falls Blvd. for pedestrians and bicyclists.

This project is needed because Spokane Falls Blvd. a major City arterial with approximately 9,800 ADT bisects the college campus. Such a bisection results in the need for a large portion of the 3,000± students walking or biking from one building to the other to cross this arterial.

The Proposed Alternative meets the purpose and need for the project.

Both the Proposed Alternative (see Figure 6) and the Avoidance Alternative #1 (see Figure 3) were presented to WSU, SIRTI, and STA. Responses of those agencies are included in Appendix C. An overview of those responses is presented below.

WSU is the owner of the land needed for the Proposed Alternative. SIRTI owns land immediately adjacent to the Proposed Alternative. Both of these landowners feel that the Proposed Alternative is feasible and prudent.

SIRTI recommends that the Proposed Alternative be adopted. Note that the Proposed Alternative allows their present driveway access configuration to remain and does not result in a loss of parking. SIRTI believes that the Proposed Alternative is the only feasible and prudent alignment.

WSU comments that the Proposed Alternative is the only acceptable alternative. This alternative is consistent with the WSU Riverpoint Campus Master Plan (see Figure 7). It is also consistent with WSU's plans for future development of the Riverpoint Campus.

The WSU master plan includes consideration of light rail. The WSU Riverpoint campus has a limited amount of land; therefore, they are planning to develop a dense urban campus. Transportation alternatives such as mass transit are an important component of the campus development. The Proposed Alternative will easily accommodate the proposed light rail system.

WSU concludes their letter with the following comment: "Alignment #3 [e.g., the Proposed Alternative] is the only reasonable and prudent solution" because of the reasons stated above.

A separate e-mail from a WSU official dated February 28, 2006 (see Appendix C) states that at the expiration date of the Interdecor lease, WSU fully intends to require the lessees to remove their buildings and improvements from the site and restore the premises to their original

unimproved condition. This alternative simply implements WSU's future plan to remove the warehouses.

The WSU master plan and the University District master plan both include consideration for high capacity transit, and specifically light rail. The agency charged with light rail planning is the Spokane Transit Authority. The STA July 27, 2005 letter regarding these alignments is contained in Appendix C.

STA comments that "In general, light rail should be planned in the median of a two way street for operational and traffic safety reasons." This alternative includes light rail in the median, as recommended.

STA also comments the Proposed Alternative is the only prudent and feasible alternative that preserves future options for light rail consistent with good traffic safety, rail operations requirements, and the City of Spokane's comprehensive land use plan that calls for the development of high-capacity transit in the downtown central business district."

STA concludes their letter with the following statement: "Prudent action is required to help ensure transportation initiatives within that corridor are consistent with regional long range transportation planning efforts. Therefore, it is our hope that a mutually agreeable arrangement could be established among the City of Spokane, Spokane Transit, and the affected tenants an/or property owners that would allow development of transportation infrastructure to proceed with eh best, most cost effective plan that includes current and future requirements." Further information in this regard can be found in the STA letter contained in Appendix C.

The Proposed Alternative supports and implements all the ideas and comments offered by SIRTI, WSU, and STA.

Minimize Disturbance

Pine Street would be constructed between Riverside Avenue and Main Street. The loading dock for the Auto Freight Depot (eligible for listing on the National Register of Historic Places) is inside the existing Pine Street right of way. The construction of sidewalk would not be included on the east side of Pine Street between Riverside Avenue and Main Street in an effort to avoid the Auto Freight Depot loading dock. The loading dock is not currently functional, nor would it be functional in the future.

Separate from the 4(f) analysis, the following mitigation measures were developed through Section 106 of the National Historic Preservation Act:

- Select 10 of the most significant historic properties within the above described area for evaluation and survey.
- Conduct a survey of the 10 properties, which will include descriptive notes, digital photography, and background research.
- Complete Washington State Historic Property Inventory Forms for the selected properties, which will include property descriptions, significance statements, and determinations of NRHP eligibility.

A full version of the MOA is included in the appendix.

In addition, a commemorative plaque in a suitable location as determined by the City's Historic Preservation official will be included in the forthcoming Experience Historic Spokane program.

Conclusion

For the following reasons the Proposed Alternative (see Figure 6) is our preferred alternative:

1. This alternative meets the project's purpose and need; therefore, fulfills an urgent public need.

2. This alternative does not create a new separated portion of the WSU property from the rest of the campus. This alignment accomplishes the goal to reduce the traffic impacts to bicycles and pedestrians. Therefore, no unique engineering problems, no construction problems, or no extraordinary costs are created by this alternative.

3. This alternative moves the arterial out of the center of the WSU campus, which enhances Spokane Falls Blvd for pedestrians and bicyclists. This fulfills another urgent public need.

4. This alternative does not create unacceptable adverse social, economic, or environmental impacts when retrofitting light rail into the proposed alignment therefore no community disruption is created.

5. This alternative takes advantage of the other truly unusual feature, which is that WSU already plans to demolish the buildings. Therefore, it is fits with WSU's Campus Master Plan.

Based upon the facts documented in this and preceding chapters, there is no feasible and prudent alternative to the use of the subject section 4(f) properties and the proposed action includes all possible planning to minimize harm to the Section 4(f) properties resulting from such use.

Table 1 presents evaluation criteria and a comparison of the proposed action and other alternatives.

Table 1 Comparison of Feasibility & Prudence of Alternatives

Alternative Evaluated	No Build	Avoidance Alternative #1	Avoidance Alternative #2	Avoidance Alternative #3	Minimize Disturbance Alternative	Proposed Alternative
Unique Engineering or Construction Problems	None	Separates a parcel from rest of WSU campus	None	Numerous aerial on/off ramps, additional traffic at overloaded Hamilton/Trent intersection	Separates a parcel from rest of WSU campus	Deletes sidewalks on E. side of Pine Street
Extraordinary Costs	None	Replace SIRTI parking and truck access	Large number of bldg removals	Numerous aerial on/off ramps	Replace SIRTI parking and truck access	None
Community Disruption	Traffic continues through campus	Major impacts to: **1.** SIRTI parking and access, **2.** Future light rail, **3.** warehouse access, **4.** WSU campus master plan	Major impacts to Gonzaga campus	Removal of several businesses and homes	Major impacts to: **1.** SIRTI parking and access, **2.** warehouse access, **3.** WSU campus master plan	None
Adverse Environmental Impacts	None	None	None	Subst. additional traffic at Hamilton/ Trent inters.	None	None
Section 4(f) Resource Impacts	None	Eliminates access to warehouses	None	None	Eliminates one warehouse Eliminates access to remaining warehouse	Removes warehouses
Failure to Fulfill Public Need	Does not fulfill purpose and need	Does not fulfill purpose and need (i.e. creates new isolated building)	Creates new public need on Gonzaga	Creates new public need at Hamilton/ Trent intersection	Does not fulfill purpose and need (i.e. creates new isolated building)	Fulfills purpose and need
Avoidance Alternate Causes Deterioration to Other Property or Prevents Development	None	Eliminates 63% of SIRTI parking, prevents development per WSU master plan	Major impacts to Gonzaga campus	Removes several houses and businesses	Eliminates portion of SIRTI parking, prevents development per WSU master plan	None

(continued next page)

Table 1 Comparison of Feasibility & Prudence of Alternatives (continued)

Alternative Evaluated	No Build	Avoidance Alternative #1	Avoidance Alternative #2	Avoidance Alternative #3	Minimize Disturbance Alternative	Proposed Alternative
Other Unusual Factors	None	WSU will remove warehouses when lease expires, even if avoided now	This alternative shifts the arterial from one univ. to another. WSU will remove warehouses when lease expires, even if avoided now	Very high costs associated with numerous aerial on/off ramps WSU will remove warehouses when lease expires, even if avoided now	Not feasible to remove one but not the other warehouse. WSU will remove warehouses when lease expires, even if avoided now	None
Feasible	No	No	No	No	No	Yes
Prudent	No	No	No	No	No	Yes

CHAPTER 5 COMMITMENTS

The Proposed Alignment (see Figure 6) would require that the Ryan Fruit and Produce Company warehouse and the Piggly Wiggly/Safeway/R.S. Gordon warehouse be removed.

Paragraph F in Chapter 3 is titled "Applicable Clauses Affecting Ownership". Paragraph F discusses the lease arrangements affecting the Piggly Wiggly/Safeway/R.S. Gordon warehouse building. The building tenant, Interdecor, must remove the warehouse at the end of their lease. Interdecor's current lease expires on December 31, 2009. Interdecor has the option of extending the lease for five additional years, to December 31, 2014.

A February 28, 2006 e-mail (Appendix C) from WSU states "...Should the lease continue to its expiration date, WSU fully intends to require the lessee to remove their buildings and improvements from the site, and to restore the premises to their original unimproved condition."

The City of Spokane cannot wait seven years until December 31, 2014 to pursue this project. As indicated in Chapter 1, Section B, this project is viewed as tool to help economic development by implementing the University District Master plan. The City of Spokane desires to pursue economic development now, not after December 31, 2014.

This project is important now, and was submitted for funding based upon its priority. The funding agencies at the federal level recognized the present need for this project, and funded this project ahead of other competing projects. These funding agencies desire to see the project utilize their funding on a timely basis and not be put on hold.

This project is viewed as a tool to help economic development; therefore the City cannot begin by ignoring the needs of an existing business. Interdecor needs to know what is going to happen with this project, and how it will affect them. They deserve to know so they can plan their future business interests accordingly.

The City of Spokane is committed to following the Federal Highway Administration right of way procedures for acquiring the necessary right of way and relocating Interdecor.

CHAPTER 6 COORDINATION WITH OTHER AGENCIES

A. State Historic Preservation Officer (SHPO)

The archeology and historic report done by Archeological and Historical Services titled "A Cultural Resources Survey of the University District Safety Enhancement Project, Spokane County, Washington" was provided to WSDOT Highways and Local Programs Office to review and circulate to the Tribes and the State Historic Preservation Officer. The report is enclosed in Appendix B. The Department of Archaeology and Historic Preservation November 21, 2005 response is also enclosed in Appendix B.

B. Local Officials With Jurisdiction

The City of Spokane requested that a portion of SR-290 (Trent Avenue) be transferred from WSDOT to the City. This request is know as a Route Jurisdiction Transfer. It involved the portion of SR-290 between SR-2/395 at Division Street to SR-290 Spur at Hamilton Street. This route jurisdiction transfer was agreed to by WSDOT with their March 31, 2004 letter. The Transportation Improvement Board recommended that this request be approved. This request passed the Washington State Senate by a vote of 42 yeas to 0 nays on February 25, 2005. It was signed into law by the Governor. The City of Spokane was notified of this action by Steven Gorcester with his May 2, 2005 letter. Copies of this correspondence is included in Appendix A

WSDOT sent a February 28, 2005 letter in support of this project. This letter is contained in Appendix C.

The City of Spokane passed an ordinance changing the name of Trent Avenue to Spokane Falls Boulevard between Division and Hamilton on November 17, 2003. A copy of this ordinance number C33340 is contained in Appendix C.

C. Historic Societies, Museums, Or Academic Institutions

Avoidance Alternative #1, the Minimize Disturbance Alternative and the Proposed Alternative were discussed with WSU, SIRTI, and STA with a City of Spokane letter dated June 16, 2005. All three organizations replied. The City of Spokane June 16, 2005 letter and their responses are included in Appendix C. In addition, a separate e-mail correspondence with WSU concerning future plans for the land currently occupied by the Piggly Wiggly/Safeway/R.S. Gordon warehouse is included as Appendix C.

D. Archaeological & Historic Consultant

The archeology and historic report relating to Phase 1 of this project was done by Archeological and Historical Services. Their report, titled "A Cultural Resources Survey of the University District Safety Enhancement Project, Spokane County, Washington" is enclosed in Appendix B. This archeological and historic report was forwarded to WSDOT on September 14, 2005 for review and further distribution.

The archeology and historic qualitative assessment relating to Phases 2/3 of this project was done by Archeological and Historical Services. It was forwarded to WSDOT on 10-3-06 for review and further distribution.

E. Advisory Council On Historic Preservation (ACHP)

Refer to the letter the 2-15-06 to Carol Legard of ACHP in Appendix B.

F. Indian Tribes

The Spokane Tribe of Indians was sent a letter describing the proposed Phase 1 project and requesting comment on tribal concerns. The Tribe responded, expressing interest, but indicated they had no particular concerns with the project. They would, however, like to receive a copy of the cultural resources report. WSDOT is responsible for sending a copy of the cultural resources report to the tribe. A copy of the Spokane Tribe response letter is attached to the archeology and historic report contained in Appendix B.

The Spokane Tribe and Coeur d'Alene Tribes attended a pre-cultural resource survey related to Phases 2/3 of this project on the morning of Sep. 25, 2006.

CHAPTER 7 SUMMARY

The objectives of this project are summarized in the purpose and need statements which, from above, area as follows:

The purpose for this project is to improve the safety of the existing Spokane Falls Blvd. for all forms of transportation, and to enhance Spokane Falls Blvd. for pedestrians and bicyclists.

This project is needed because Spokane Falls Blvd. a major City arterial with 9,800 ADT bisects the college campus. Such a bisection results in the need for a large portion of the 3,000± students walking or biking from one building to the other to cross this arterial.

The project area is surrounded by several higher education campuses, which include Washington State University, Eastern Washington University, and Gonzaga University. These education institutions are supported by the Community Colleges of Spokane, and the Spokane Intercollegiate Research and Technology Institute. It is expected that eventually 15,000 students will be served by these downtown campuses, along with student and facility housing, retail, and other commercial uses.

This area has been the subject of several cooperating plans, which are the University District Master Plan, the WSU Master Plan, and the Light Rail plan. All these plans show a transportation corridor in this location, which would require the use of the 4(f) warehouses.

The No Build alternative does not meet the purpose and need of this project. Through traffic would remain in the center of campus.

Avoidance Alternative #1 includes unacceptable impacts to SIRTI and WSU property and does not meet the purpose and need of this project.

Avoidance Alternative #2 results in immense impacts to the Gonzaga campus as well as shifting the arterial through campus problem from WSU to Gonzaga.

Avoidance Alternative #3 shifts large amounts of traffic to the already overloaded Trent/Hamilton intersection would vastly more costly than any of the other alternatives.

Minimize Disturbance Alternative is not feasible and even if it were, it includes unacceptable impacts to WSU property and does not meet the purpose and need of this project.

Proposed Alternative is consistent with the University District Master Plan, the WSU Master Plan, and the Light Rail plan. It does not create adverse affects on the surrounding property. It does support the purpose and need. While this alternative requires the warehouses to be removed; WSU has indicated in writing that it will remove these warehouses in the future regardless of which alternative is selected. Mitigation alternatives are available and will be implemented if the warehouses are removed by this project. Such mitigation alternatives may or may not be implemented if the warehouses are removed by WSU. The Proposed Alternative is therefore the selected alternative.