

CHARLES H. MONTANGE
ATTORNEY AT LAW
426 NW 162ND STREET
SEATTLE, WASHINGTON 98177

(206) 546-1936
FAX: (206) 546-3739

18 August 2023
(by electronic filing)

Office of Environmental Analysis ("OEA")
Surface Transportation Board
Washington, D.C. 20423
Attn: Danielle Gosselin, Director

Re: Snohomish County – Adverse Abandonment – GNP RLY, Inc.,
in Snohomish County, WA, AB 1331

Circulation of Environmental Report/Historic Report
for comment per 49 C.F.R. 1105.7(b) and 1105.8(c)

Dear Director Gosselin and OEA staff:

This letter is on behalf of Snohomish County ("County"). County intends to file an adverse abandonment application captioned above on or about October 17, 2023. Please see Snohomish County – Adverse Abandonment – GNP RLY, Inc., in Snohomish County, WA, AB 1331, decision served May 23, 2023, for further information.

After soliciting comment from, inter alia, all entities listed in 49 C.F.R. 1105.7(b) and 1105.8(c), AECOM (a consulting firm retained by Snohomish County) prepared and (on the date above) served by email attachment (on behalf of Snohomish County) an Environmental Report and Historic Report (ER/HR) and cover letter in accordance with applicable STB regulations. The timing of this service is in compliance with the minimum time prescribed in 1105.7(b) and the recommended time prescribed in 1105.8(c) for circulation of the ER/HR prior to

filing an application for abandonment. A copy of the cover letter and ER/HR are attached for your reference.

Should there be any questions, please get in touch with me (email address is c.montange@frontier.com) or, as you deem appropriate, AECOM directly (attn: Kimberly Anderson, email kimberly.anderson@aecom.com).

Thank you for your assistance in this matter.

Respectfully submitted,



Charles H. Montange
Attorney for Snohomish County

Att.

cc. Sean Reay, Esq. (Snohomish County) (email and attachment)
James Savage, Esq. (for GNP RLY, Inc.) (email and attachment)
Kimberly Anderson (AECOM) (email and attachment)



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

August 18, 2023

To: Attached Service List

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse Abandonment GNP Rly. Inc., in Snohomish County, WA

AECOM sends this letter on behalf of Snohomish County (“the County”). On or shortly after October 17, 2023, the County expects to be filing with the Surface Transportation Board (STB) a third-party, or “adverse,” application for abandonment, pursuant to 49 Code of Federal Regulations (CFR) Part 11252, Subpart C, as modified by the decision served May 23, 2023 in STB Docket AB 1331, seeking to abandon 11.9 miles of freight rail easement in Snohomish County, Washington, between Mileposts 26.38 (Snohomish/King County line) and 38.25 (City of Snohomish). The County advises that it also intends to railbank the entire line in accordance with 49 CFR 1152.29. Attached is a combined Environmental and Historic Report describing the proposed action and any expected environmental and/or historic effects, as well as a map of the affected area.

We are providing this report so that you may review the information that will form the basis for the STB’s independent environmental analysis of this proceeding. If any of the information is misleading or incorrect, if you believe that pertinent information is missing, or if you have any questions about the STB’s environmental review process, please contact the Office of Environmental Analysis (OEA), STB, Washington, DC 20423, telephone 202-245-0294 and refer to Docket No. AB 1331. Because the applicable statutes and regulations impose stringent deadlines for processing this action, your written comments to OEA (with a copy to me and Charles H. Montange, the County’s representative) would be appreciated within 3 weeks.

Your comments will be considered by the STB in evaluating the environmental and/or historic preservation impacts of the contemplated action. If there are questions concerning this proposal, please contact Snohomish County’s representative directly. He may be contacted by telephone at 206-546-1936 or by mail at Law Offices of Charles H. Montange, 426 NW 162nd St., Seattle (Shoreline), WA 98177.

Sincerely,

A handwritten signature in black ink, appearing to read "Kim Anderson", is written over a horizontal line.

Kim Anderson
Ecologist and Project Manager
Kimberly.anderson@aecom.com; 206-724-6023

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August, 2023 I served a copy of the attached Environmental/Historic Report on the persons listed below by email.

AGENCY SERVICE LIST

AGENCIES	
Kerri Woehler, Director Washington Department of Transportation Multimodal Planning Division P.O. Box 47370 Olympia, WA 98504-7370 Kerri.Woehler@wsdot.wa.gov	Mike McCrary, Director Snohomish County Planning and Development Services 3000 Rockefeller Avenue Everett, WA 98201 m.mccrary@snoco.org
Brooke Eidem, Planning Director City of Snohomish Planning and Development Services Department P.O. Box 1589 Snohomish, WA 98290 eidem@snohomishwa.gov	Robert Grumbach City of Woodinville Development Services Department 17301 - 133rd Ave NE, Woodinville, WA 98072 robertg@ci.woodinville.wa.us
Dave Somers Snohomish County Executive Chinook Office Building 3000 Rockefeller Avenue M/S 407 Everett, WA 98201 Dave.somers@snoco.org	Josh Brown Executive Director Puget Sound Regional Council 1011 Western Avenue, Suite 500 Seattle, WA 98104 jbrown@psrc.org
Communications and Outreach Branch NOAA, N/NGS12 National Geodetic Survey, SSMC3 #8716 1315 East-West Highway Silver Spring, MD 20910-3282 ngs.infocenter@noaa.gov	Terry Cosby USDA NRCS Office of the Chief 1400 Independence Ave., SW Room 6149-S Washington, DC 20250 terry.cosby@usda.gov
Lynn Khuat Resource Conservationist NRCS Renton Service Center 941 Powell Ave SW, Suite 102 Renton, WA 98057 lynn.khuat@usda.gov	Loreé Randall Federal Consistency Coordinator Washington State Coastal Zone Management Program P.O. Box 47600 Olympia, WA 98504 lore.randall@ecy.wa.gov

Kate Norman U.S. Fish and Wildlife Service Pacific Region 1 Assistant Regional Director of Ecological Services 911 NE 11th Avenue, 5th Floor Portland, OR 97232-4181 Fw1_AEAinbox@fws.gov	Jennifer Quan Regional Administrator NOAA Fisheries West Coast Regional Office 1201 Northeast Lloyd Portland, OR 97232 jennifer.quan@noaa.gov
Jesse Dykstra Washington Department of Fish and Wildlife North Puget Sound Regional Office 16018 Mill Creek Blvd. Mill Creek, WA 98012-1541 Jesse.Dykstra@dfw.wa.gov	Ashley Kees Washington Department of Fish and Wildlife North Puget Sound Regional Office 16018 Mill Creek Blvd. Mill Creek, WA 98012-1541 Ashley.Kees@dfw.wa.gov
David Siegenthaler Regional Program Manager, Federal Lands to Parks Program National Park Service 909 First Avenue, 5th Floor Seattle, WA 98104 David.Siegenthaler@nps.gov	Megan Duffy Director Washington Recreation and Conservation Office P.O. Box 40917 Olympia, WA 98504-0917 megan.duffy@rco.wa.gov
Meg Bommarito Regional Planner Washington Department of Ecology Northwest Regional Office P.O. Box 330316 Shoreline, WA 98133-9716 Meg.Bommarito@ecy.wa.gov	Mae Ancheta U.S. Army Corps of Engineers Seattle District P.O. Box 3755 Seattle, WA 98124-3755 mae.p.ancheta@usace.army.mil
Casey Sixkiller Acting Administrator U.S. EPA, Region 10 1200 Sixth Avenue, Suite 155 Seattle, WA 98101 sixkiller.casey@epa.gov	Maureen Elenga Transportation Reviewer Washington Department of Archaeology & Historic Preservation P.O. Box 48343 Olympia, WA 98504-834 Maureen.Elenga@dahp.wa.gov
TRIBES	
Laura Murphy Archaeologist Muckleshoot Indian Tribe 39015 172nd Ave SE Auburn, WA 98092 laura.murphy@muckleshoot.nsn.us	Steven Mullen Moses Department of Archaeology and Historic Preservation Director Snoqualmie Indian Tribe P.O. Box 969 Snoqualmie, WA 98065 steve@snoqualmieltribe.us

Cindy Spiry Environmental and Natural Resources Director Snoqualmie Indian Tribe cindy@snoqualmietribe.us	Adam Osbekoff Cultural Resource Compliance Manager Snoqualmie Indian Tribe adam@snoqualmietribe.us
Richard Young Cultural Resource Manager Tulalip Tribes Hibulb Cultural Center & Natural History Preserve 6410 23rd Avenue NE Tulalip, WA 98271 ryoung@tulaliptribes-nsn.gov	Ryan Miller Environmental Liaison Tulalip Tribes 6406 Marine Dr. Tulalip, WA 98721 ryanmiller@tulaliptribes-nsn.gov
Dennis Lewarch Tribal Historic Preservation Officer Suquamish Tribe P.O. Box 498 Suquamish, WA 98392 dlewarch@Suquamish.nsn.us	Kerry Lyste Tribal Historic Preservation Officer Stillaguamish Tribe P.O. Box 277 Arlington, WA 98223 klyste@stillaguamish.com
Shaun Dinubilo Archaeologist Squaxin Island Tribe 200 SE Billy Frank Jr. Way Shelton, WA 98584 sdinubilo@squaxin.us	Kevin Joseph Tribal Historic Preservation Officer Sauk-Suiattle Tribe 5318 Chief Brown Lane Darrington, WA 98241 kJoseph@sauk-suiattle.com thpo@sauk-suiattle.com
Josephine Jefferson Tribal Historic Preservation Officer Swinomish Indian Tribal Community 11367 Moorage Way La Conner, WA 98257 jjefferson@swinomish.nsn.us	

Before the
SURFACE TRANSPORTATION BOARD
Docket No. AB 1331
SNOHOMISH COUNTY—ADVERSE ABANDONMENT—GNP RLY, INC., IN
SNOHOMISH COUNTY, WASHINGTON

ENVIRONMENTAL/HISTORIC REPORT

Snohomish County submits this combined Environmental/Historic Report in compliance with the requirements of 49 Code of Federal Regulations (CFR) §§ 1105.7 and 1105.8. As described herein, the proposed abandonment will not significantly impact the quality of the human environment.

ENVIRONMENTAL REPORT

1. PROPOSED ACTION AND ALTERNATIVES

Describe the proposed action, including commodities transported, the planned disposition (if any) of any rail line and other structures that may be involved, and any possible changes in current operations or maintenance practices. Also describe any reasonable alternatives to the proposed action. Include a readable, detailed map and drawings clearly delineating the project.

Snohomish County (the County) proposes to file a third-party (or “adverse”) application to abandon (and railbank) an 11.9-mile segment of freight rail easement in Snohomish County, Washington (Snohomish Segment, line). A map of the project area is attached as Appendix A. The Snohomish Segment runs between Milepost 26.38 at the King-Snohomish county boundary line and Milepost (MP) 38.25 at Commercial Street in the City of Snohomish. The Snohomish Segment is the northernmost portion of the Eastside Rail Corridor (also referred to herein as the “freight segment”), a 14.45-mile rail line running between the City of Snohomish and Woodinville, Washington. The proposed action relates only to the Snohomish County portion of the freight segment. The Woodinville portion of the freight segment (MP 23.8 to MP 26.38) was abandoned and railbanked in another proceeding (STB Docket 1316X).

Rail use of the northernmost portion of the segment at issue in this proceeding (i.e., roughly MP 38 near the Burlington Northern Santa Fe [BNSF] east-to-west mainline north to MP 38.25) ceased more than two decades ago. By 2009, when the freight segment was acquired by the Port

of Seattle (Port) subject to a BNSF-retained exclusive freight rail easement, there was no overhead traffic and local traffic was dropping off. GNP Rly, Inc. (GNP), acquired the easement from BNSF and went bankrupt soon thereafter, with its assets being sold to Eastside Community Rail (ECR).

To Snohomish County's knowledge, neither GNP nor ECR owned rail equipment, and both relied on Ballard Terminal Railroad Company (BTRC) to operate the line as lessee. In 2016, the freight segment lost a major shipper (Spectrum Glass), which shifted its operations out of state. Rail use was embargoed for a period in 2019 due to a damaged bridge. All rail use of the segment ceased no later than August 1, 2020, when BTRC embargoed the line due to "track conditions."¹ There have been no shipments on the line since that date, and BTRC withdrew its equipment from the line in mid-August 2020. Prior to the embargo, BTRC transported sand and pellets for glass making (until about 2016 when Spectrum Glass moved its operations), lumber, and drywall on or over the Snohomish Segment for a handful of customers in Maltby (Snohomish County) and Woodinville (King County). In December 2020, the Board vacated the acquisition and operating exemption of ECR and the lease and operating exemption of BTRC. The sole entity licensed to own and operate the freight segment at that point was, again, GNP, under different ownership.²

The County has no plans to salvage the track and ties at this time. The Snohomish portion of the freight segment includes a rail overcrossing over State Route 522, a steel truss bridge over the Snohomish River, and six wood trestle bridges that cross over agricultural lands, Batt Slough, and Connelly Road. The County does not have any plans to remove these structures at this time.

There is no practical alternative to abandoning or railbanking the Snohomish Segment. Costly rehabilitation due to prolonged periods of deferred maintenance would be required to support resumption of rail operations. The Snohomish portion of the freight segment lacks service demand, and especially service demand adequate to amortize the cost of rehabilitating and maintaining the line, or even to cover operating expenses.

¹ The embargo covered the entire Eastside Rail Corridor, between the City of Snohomish at MP 38.25 and the south end of the Woodinville Segment at MP 23.8. See Embargo No. ECYR000120, copy attached to Snohomish County Motion For Leave to File Notice and Notice of Recent Developments (Embargo), FD 35692 and FD 35730 (filed August 6, 2020).

² *Eastside Community Rail, LLC – Acquisition and Operation Exemption – GNP RLY, Inc., FD 35692 and 35730 (served Dec. 22, 2020).*

2. EFFECTS ON THE TRANSPORTATION SYSTEM

Describe the effects of the proposed action on regional or local transportation systems and patterns. Estimate the amount of traffic (passenger or freight) that will be diverted to other transportation systems or modes as a result of the proposed action.

The proposed abandonment will have no effect on regional or local transportation systems or patterns because there has been no traffic on the freight segment for more than 3 years. The entire line was embargoed effective August 1, 2020, due to track conditions. There has been no traffic since that date. Consequently, no traffic will be diverted from rail to other transportation systems as a result of the proposed action.

The County sent a consultation letter regarding the proposed abandonment to the Washington State Department of Transportation (WSDOT), Multimodal Planning Division. (Appendix B). As of the date of this Environmental Report, WSDOT has not responded to our inquiry.

3. LAND USE

- (i) ***Based on consultation with local and/or regional planning agencies and/or a review of the official planning documents prepared by such agencies, state whether the proposed action is consistent with land use plans. Describe any inconsistencies.***

The proposed action is consistent with existing land use plans. The County sent a consultation letter to Snohomish County Planning and Development Services Department, City of Snohomish Planning and Development Services Department, City of Woodinville Development Services Department, the Snohomish County Executive, and the Puget Sound Regional Council (PSRC) regarding the proposed abandonment (Appendix B). As of the date of this Environmental Report, none of these agencies have responded to our inquiry.

The County sent a consultation letter regarding the proposed abandonment to the National Oceanic and Atmospheric Administration (NOAA) National Geodetic Survey (NGS) (Appendix B). On July 13, 2023, Deborah Brooks at NGS responded via email that there could be geodetic survey marks located in the project area, and that any marks still present could be disturbed by the abandonment. However, any disturbance would be associated with salvage, which is not being proposed as part of this action (Appendix C). AECOM reviewed the National Geodetic Server Explorer (<https://geodesy.noaa.gov/NGSDataExplorer/>) and determined that the closest survey mark is approximately 900 feet west of the line, off Airport Way south of the Snohomish River. On July 21, 2023, Deborah Brooks sent a follow-up response via email that the NGS found no geodetic markers along the track segment that would be jeopardized by the proposed abandonment (Appendix C).

The County sent a consultation letter regarding the proposed abandonment to the Washington Recreation and Conservation Office (RCO) (Appendix B). On July 13, 2023, Megan Duffy at the Washington RCO responded via email that a review of the relevant properties had been conducted and the office had no comments.

(ii) Based on consultation with the U.S. Soil Conservation Service, state the effect of the proposed action on any prime agricultural land.

The Snohomish Segment crosses urban industrial, rural residential, and agricultural lands. Most of the northern third of the line is in or adjacent to land that is zoned by the County as Agriculture – 10 Acre (A-10), and a portion of the line crosses land that currently supports agricultural uses. Soil map units that are considered prime or other important farmland soils have been mapped along most (10.6 miles [89 percent]) of the line (Table 1). The railroad bed currently consists of fill material that does not support agricultural uses.

The proposed action does not include salvage of rails or ties or removal of the railroad bed. As such it will have no impact on hydrology that could impact adjacent agricultural uses or irrigation, and it will have no impact on prime agricultural soils.

Table 1. Prime and Other Important Farmland Soils Along the Snohomish Segment

Soil Map Unit	Classification	Approximate Length of Line
Alderwood gravelly sandy loam, 0 to 8 and 8 to 15 percent slopes	Prime farmland if irrigated	30,305 feet
Alderwood gravelly sandy loam, 15 to 30 percent slopes	Farmland of statewide importance	8,984 feet
Puget silty clay loam	Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season	5,468 feet
Sultan silt loam	All areas prime farmland	4,658 feet
Puyallup fine sandy loam	All areas prime farmland	2,395 feet
Kitsap silt loam, 8 to 25 percent slopes	Farmland of statewide importance	1,645 feet
Everett very gravelly sandy loam, 0 to 8 percent slopes	Farmland of statewide importance	1,384 feet
Pilchuk loamy sand	Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season	458 feet
Indianola loamy sand, 15 to 30 percent slopes	Farmland of statewide importance	264 feet
Norma loam	Prime farmland if drained	260 feet
Tokul gravelly medial loam, 0 to 8 percent slopes	All areas prime farmland	217 feet
Sumas silt loam	Prime farmland if drained	149 feet

Soil Map Unit	Classification	Approximate Length of Line
Arents, Everett material	Prime farmland if irrigated	13 feet
Everett very gravelly sandy loam, 15 to 30 percent slopes	Farmland of statewide importance	10 feet
Total		56,210 feet (10.6 miles)

Sources: NRCS Web soil survey (<https://websoilsurvey.nrcs.usda.gov/app/>), Soil Data Access Prime and other Important Farmlands (<https://www.nrcs.usda.gov/publications/Legend%20and%20Prime%20Farmland%20-%20Query%20by%20Soil%20Survey%20Area.html>)

The County sent a consultation letter to the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS), formerly known as the Soil Conservation Service, regarding the proposed abandonment (Appendix B). As of the date of this Environmental Report, NRCS has not responded to our inquiry.

(iii) If the action affects land or water uses within a designated coastal zone, include the coastal zone information required by § 1105.9.

The Snohomish Segment is located within a designated coastal zone. The abandonment will have no effect on land or water uses within the coastal zone.

The County sent a consultation letter to the Federal Consistency Coordinator at the Washington Department of Ecology (Ecology) - Coastal Zone Management Program, regarding the proposed abandonment (Appendix B). As of the date of this Environmental Report, Ecology has not responded to our inquiry.

(iv) If the proposed action is an abandonment, state whether or not the right-of-way is suitable for public use under 49 U.S.C. 10905 and explain why.

The right-of-way is suitable for public use as a trail. Snohomish County intends to railbank the Snohomish Segment and to develop a trail (the Centennial Trail South) on the line, which will be part of both the existing 30-mile long Centennial Trail in Snohomish County and Eastrail, a 42-mile trail and transit project currently under development in King County. The portion of rail line at issue in this proceeding, if converted to railbanking and trail use, will link to the existing 30-mile long Centennial Trail between the City of Snohomish and the Skagit County line in the north, and to the Eastrail project from the King County line to Kenneydale near Renton in King County.

4. ENERGY

(i) Describe the effect of the proposed action on transportation of energy resources.

The proposed abandonment will have no effect on the transportation of energy resources. The Snohomish Segment has no potential for overhead traffic and the line has been out of service since 2020.

(ii) Describe the effect of the proposed action on recyclable commodities.

The proposed abandonment will have no effect on the movement of recyclable commodities. The Snohomish Segment has no potential for overhead traffic and the line has been out of service since 2020.

(iii) State whether the proposed action will result in an increase or decrease in overall energy efficiency and explain why.

The Snohomish Segment has no potential for overhead traffic and the line has been out of service since 2020. As such, the proposed abandonment/railbanking will have no effect on overall energy efficiency.

(i) If the proposed action will cause diversions from rail to motor carriage of more than:

(A) 1,000 rail carloads a year; or

(B) An average of 50 rail carloads per mile per year for any part of the affected line,

quantify the resulting net change in energy consumption and show the data and methodology used to arrive at the figure given. To minimize the production of repetitive data, the information on overall energy efficiency in § 1105.7(e)(4)(iii) need not be supplied if the more detailed information in § 1105.7(e)(4)(iv) is required.

The Snohomish Segment currently has no traffic, and the proposed abandonment will not divert any traffic from rail to motor carriage. Based on a record of car counts for the years 2016 through 2019, the largest number of rail cars using the line was 106 (in 2016 and 2018). Even if all railcars that used the line over these 4 years were diverted to motor carriage, the volume of traffic diverted would not approach either of the thresholds quoted above.

5. AIR

- (i) *If the proposed action will result in either:*
- (A) *An increase in rail traffic of at least 100 percent (measured in gross ton miles annually) or an increase of at least eight trains a day on any segment of rail line affected by the proposal, or*
 - (B) *An increase in rail yard activity of at least 100 percent (measured by carload activity), or*
 - (C) *An average increase in truck traffic of more than 10 percent of the average daily traffic or 50 vehicles a day on any affected road segment, quantify the anticipated effect on air emissions. For a proposal under [49 U.S.C. 10901](#) (or 10502) to construct a new line or reinstitute service over a previously abandoned line, only the eight train a day provision in subsection (5)(i)(A) will apply.*

The Snohomish Segment has no potential for overhead traffic, the line has been out of service since 2020, and the proposed action is abandonment. As such, the proposed action will not result in an increase in rail traffic, rail yard activity, or truck traffic exceeding any of the thresholds quoted above.

- (ii) *If the proposed action affects a Class I or nonattainment area under the Clean Air Act, and will result in either:*
- (A) *An increase in rail traffic of at least 50 percent (measured in gross ton miles annually) or an increase of at least three trains a day on any segment of rail line,*
 - (B) *An increase in rail yard activity of at least 20 percent (measured by carload activity), or*
 - (C) *An average increase in truck traffic of more than 10 percent of the average daily traffic or 50 vehicles a day on a given road segment, then state whether any expected increased emissions are within the parameters established by the State Implementation Plan. However, for a rail construction under [49 U.S.C. 10901](#) (or [49 U.S.C. 10502](#)), or a case involving the reinstitution of service over a previously abandoned line, only the three train a day threshold in this item shall apply.*

For reasons noted in subsection (i) above, the proposed action will not result in any increase in rail or truck traffic exceeding any of the thresholds quoted above. The proposed abandonment will not affect any Class I or nonattainment area.

- (iii) *If transportation of ozone depleting materials (such as nitrogen oxide and freon) is contemplated, identify: the materials and quantity; the frequency of service; safety practices (including any speed restrictions); the applicant's safety record (to the extent available) on derailments, accidents and spills; contingency plans to deal with accidental spills; and the likelihood of an accidental release of ozone depleting materials in the event of a collision or derailment.*

For reasons noted in subsection (i) above, the proposed abandonment will not affect the transportation of ozone depleting materials.

6. NOISE

If any of the thresholds identified in item (5)(i) of this section(49 CFR 1105.7(e)(5)(i)) are surpassed, state whether the proposed action will cause:

- (i) *An incremental increase in noise levels of three decibels Ldn or more; or*
- (ii) *An increase to a noise level of 65 decibels Ldn or greater.*

If so, identify sensitive receptors (e.g., schools, libraries, hospitals, residences, retirement communities, and nursing homes) in the project area, and quantify the noise increase for these receptors if the thresholds are surpassed.

Not applicable. None of the thresholds in 49 CFR 1105.7(e)(5)(i) will be surpassed as a result of the proposed action.

7. SAFETY

- (i) *Describe any effects of the proposed action on public health and safety (including vehicle delay time at railroad grade crossings).*

The abandonment will have no adverse effect on public health and safety. There are five public at-grade crossings and eight private at-grade crossings on the Snohomish Segment. The proposed abandonment does not include salvage operations or any other actions at at-grade crossings.

- (ii) *If hazardous materials are expected to be transported, identify: the materials and quantity; the frequency of service; whether chemicals are being transported that, if mixed, could react to form more hazardous compounds; safety practices (including any speed restrictions); the applicant's safety record (to the extent available) on derailments, accidents and hazardous spills; the contingency plans to deal with accidental spills; and the likelihood of an accidental release of hazardous materials.*

The proposed abandonment will not result in the transportation of hazardous materials.

- (iii) *If there are any known hazardous waste sites or sites where there have been known hazardous materials spills on the right-of-way, identify the location of those sites and the types of hazardous materials involved.*

There are no known active hazardous waste sites or hazardous materials spill sites on the right-of-way.

According to Ecology's "What's in my Neighborhood" mapper, a single active Voluntary Cleanup Program site (Knoll Lumber, 23605 Woodinville-Snohomish Rd) is mapped immediately adjacent to, the line. The Knoll Lumber Site is a petroleum products soil contamination site associated with its former use as an auto wrecking yard. The contamination was identified in 1998 and voluntary cleanup occurred in 1999.

One historical Independent Remedial Action Program (Eastside Rail Spill, RR mile 34.3 and Connelly Rd) is documented on the right-of-way. The Eastside Rail Spill was an unspecified petroleum products soil contamination site that was identified in February 2020, and remediated in July 2020. The site status was changed to No Further Action on July 7, 2020.

8. BIOLOGICAL RESOURCES

- (i) *Based on consultation with the U.S. Fish and Wildlife Service, state whether the proposed action is likely to adversely affect endangered or threatened species or areas designated as a critical habitat, and if so, describe the effects.*

The proposed action is not likely to adversely affect endangered or threatened species or areas designated as critical habitat. The County's consultant used the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) website, the NOAA Fisheries Protected Resources App, the Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species website and the Statewide Integrated Fish Distribution data set to obtain information on threatened and endangered species potentially present in the vicinity of the Snohomish Segment. Information on these species is presented in Table 2.

Table 2. Threatened and Endangered Species Potentially Present in the Project Area

Species Common Name <i>Scientific Name</i>	Federal Status	Nearest Suitable Habitat	Proposed Effects Determination	Rationale
Chinook Salmon <i>Oncorhynchus tshawytscha</i> Puget Sound ESU	Threatened	Snohomish River; Evan's Creek, Batt Slough, and several unnamed streams	No Effect	No in-water work; no impacts on wetlands; project will not degrade water quality. No salvage activities will occur. Culverts carrying streams under the right-of-way will be left in place.
Steelhead	Threatened	Snohomish River; Evan's	No Effect	

Species Common Name <i>Scientific Name</i>	Federal Status	Nearest Suitable Habitat	Proposed Effects Determination	Rationale
<i>Oncorhynchus mykiss</i> Puget Sound ESU		Creek, Batt Slough, and several unnamed streams		
Bull Trout <i>Salvelinus confluentus</i>	Threatened	Snohomish River; Evan's Creek, Batt Slough, and several unnamed streams	No Effect	
Marbled Murrelet <i>Brachyramphus marmoratus</i>	Threatened	None in vicinity	No Effect	No old-growth forest habitat occurs within the right-of-way or vicinity. Suitable habitat and critical habitat for the murrelet do not occur within the right-of-way or vicinity.
Streaked Horned Lark <i>Eremophila alpestris strigata</i>	Threatened	Areas of low/sparse grassy vegetation associated with Harvey Airfield, agricultural sites, and the Snohomish River could potentially provide suitable habitat.	No Effect	Streaked horned lark are not documented and critical habitat does not occur within the right-of-way or vicinity. No alteration of potential suitable habitat would occur.
Yellow-billed Cuckoo <i>Coccyzus americanus</i> Western DPS	Threatened	Riparian areas along the Snohomish River could provide suitable habitat	No Effect	Yellow-billed cuckoo are not documented within the right-of-way or vicinity. This species has not been observed nesting in Washington since 1934, and only 12 sightings occurred in the state between 1950 and 2000. No alteration of potential suitable habitat would occur.
North American Wolverine <i>Gulo gula luscus</i>	Proposed Threatened	None in vicinity	No Effect	Wolverine are not documented in the right-of-way or vicinity. Suitable habitat (high elevation areas with persistent spring snow) do not occur within the right of way or vicinity.

The County sent letters to USFWS Pacific Region 1, NOAA Fisheries West Coast Regional Office, and WDFW North Puget Sound Regional Office regarding the proposed abandonment (Appendix B). As of the date of this Environmental Report, none of these agencies has responded to our inquiry, apart from an email from WDFW identifying the correct points of contact for the project.

(ii) State whether wildlife sanctuaries or refuges, National or State parks or forests will be affected, and describe any effects.

There are no known wildlife sanctuaries, refuges, National or State parks or forests on the right-of-way or in the vicinity.

The Bob Heirman Wildlife Park at Thomas' Eddy (on the Snohomish River) is a County-managed park located adjacent to the line. This site was cut off from the river by a levee, and the County is reconnecting the river to the floodplain.³ Other parks and designated open spaces adjacent to the line include trails and natural areas at the Brightwater Treatment Plant, Carousel Ranch Park, and Batt Slough. The proposed abandonment will have no impact on these areas or the floodplain restoration project, as no salvage activities will occur, and the railroad bed will remain in place.

The County sent a consultation letter to the National Park Service (NPS) Region 9 regarding the proposed abandonment/railbanking (Appendix B). As of the date of this Environmental Report, the NPS has not responded to our inquiry.

9. WATER

(i) Based on consultation with State water quality officials, state whether the proposed action is consistent with applicable Federal, State or local water quality standards. Describe any inconsistencies.

The Snohomish Segment includes one bridge over the Snohomish River. Several culverts carry streams under the rail corridor (including tributaries to Little Bear Creek, a tributary of the Sammamish River, and tributaries to the Snohomish River); several culverts connect wetlands; and numerous culverts carry stormwater runoff under the rail corridor for eventual discharge into Little Bear Creek or the Snohomish River. The proposed abandonment does not include salvage activities, and no work will occur on the bridge, culverts, or any portion of the line as part of this action. The action will not alter existing drainage flows, and no disturbance to the line will occur that would result in the need for stormwater permitting or management. For this reason, the project will be consistent with applicable federal, state, and local water quality standards.

The County sent a consultation letter to the Regional Coordinator at Ecology regarding the proposed abandonment (Appendix B). As of the date of this Environmental Report, Ecology has not responded to our inquiry.

³ Snohomish County Thomas' Eddy Restoration Project. <https://snohomishcountywa.gov/5816/Thomas-Eddy-Restoration-Project>

- (ii) *Based on consultation with the U.S. Army Corps of Engineers, state whether permits under section 404 of the Clean Water Act ([33 U.S.C. 1344](#)) are required for the proposed action and whether any designated wetlands or 100-year flood plains will be affected. Describe the effects.*

The proposed abandonment will not trigger any action under Section 404 of the Clean Water Act. Additionally, the abandonment does not trigger any action under Section 10 of the Rivers and Harbors Act because there would be no salvage work on the line and no work on structures in or affecting navigable waters of the U.S. The railroad right-of-way, ballast, and culverts will remain in place so as not to alter existing drainage flows. No floodplains will be affected by the proposed abandonment. The County sent a consultation letter to the U.S. Army Corps of Engineers (USACE) Seattle District regarding the proposed abandonment (Appendix B). As of the date of this Environmental Report, the USACE has not responded to our inquiry.

- (iii) *State whether permits under section 402 of the Clean Water Act ([33 U.S.C. 1342](#)) are required for the proposed action. (Applicants should contact the U.S. Environmental Protection Agency or the state environmental protection or equivalent agency if they are unsure whether such permits are required.)*

The County sent letters and emails to the U.S. Environmental Protection Agency (EPA) Region 10 and to the Ecology regarding the proposed abandonment (Appendix B). As of the date of this Environmental Report, neither EPA nor Ecology have responded to our inquiry. As described in subsection (i) above, the proposed abandonment does not include salvage activities, and no work will occur on the bridge or on culverts. The action will not alter existing drainage flows, and no disturbance to the line will occur that would result in discharge of pollutants into navigable waters. Therefore, no associated permits are needed.

10. PROPOSED MITIGATION

Describe any actions that are proposed to mitigate adverse environmental effects, indicating why the proposed mitigation is appropriate.

Snohomish County is not aware of any adverse environmental impacts of the proposed action that require mitigation.

11. ADDITIONAL INFORMATION FOR RAIL CONSTRUCTION

Not applicable

12. CONSULTATION

On June 29, 2023 AECOM on behalf of Snohomish County mailed and emailed copies of the letters attached as Appendix B to each of the following agencies and Tribes: WSDOT, NPS,

NOAA NGS, Snohomish County, PSRC, Washington RCO, USDA NRCS, EPA, USACE, WDFW, USFWS, NOAA Fisheries, Ecology, City of Woodinville, City of Snohomish, Washington State Department of Archaeology and Historic Preservation (DAHP), Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Swinomish Indian Tribal Community, Tulalip Tribes, Suquamish Tribe, Stillaguamish Tribe, Squaxin Island Tribe, and Sauk-Suiattle Tribe. Consultation with the Washington DAHP and Tribes is described in the attached Historic Report.

The only written responses received to date are from NOAA NGS, the Washington Recreation and Conservation Office, and Washington DAHP (Appendix C).

13. CERTIFICATIONS

Applicant certifies that:

- (a) It consulted with the agencies listed in 49 CFR 1105.7, as described in paragraph 12 above. See Appendix B.
- (b) On this date, it sent copies of this report to each of the agencies consulted. See the Agency Service List attached to the transmittal letter for this report.

August 18, 2023



Kim Anderson
AECOM

HISTORIC REPORT

1. *A U.S.G.S. topographic map (or an alternate map drawn to scale and sufficiently detailed to show buildings and other structures in the vicinity of the proposed action) showing the location of the proposed action, and the locations and approximate dimensions of railroad structures that are 50 years old or older and are part of the proposed action.*

A map showing the location of the proposed abandonment is attached as Appendix A. Two bridges on the Snohomish Segment are more than 50 years old. Their locations are indicated on the topographic map.

2. *A written description of the right-of-way (including approximate widths, to the extent known), and the topography and urban and/or rural characteristics of the surrounding area*

The Snohomish Segment runs south to north for approximately 11.9 miles, from milepost (MP) 26.38 at the King-Snohomish County line to MP 38.25 at approximately Commercial Street, slightly north of the northern bank of the Snohomish River in the city of Snohomish.

From commencement at the Snohomish/King County line, the line runs northeast through industrial development, roughly following the path of State Route 522, to commercial uses in Maltby at SR-524 until it diverts and heads north near the intersection of 204th St SE and Cedar Street (99th Ave SE) toward the City of Snohomish. It then traverses rural residential development, descending until it meets the Snohomish River Valley floor and continues north through agricultural land until it meets the Wye south of the BNSF mainline tracks and enters industrial uses before crossing the Snohomish River into the City of Snohomish. The right-of-way for this proposed abandonment is generally characterized as traveling through lowlands and accordingly rests on fill or on trestles that vary in height. The northern portion of the line goes through an agricultural area and is primarily at grade, with some sections elevated on structures. South of the agricultural area, the line traverses undulating hills with cuts and fills as needed to meet the grade requirements. The northern terminus of the line in the City of Snohomish is surrounded by residential properties. The line formerly extended from the Snohomish/King County line southwest to MP 23.8, an area that is surrounded by commercial buildings in downtown Woodinville. The portion of line in Woodinville was previously abandoned/railbanked in another Surface Transportation Board (STB) proceeding (AB 1316X) in 2023. The right-of-way for the proposed abandonment has varying widths. In 2016, Snohomish County (“the County”) acquired interests in the underlying right-of-way from the Port of Seattle (which acquired its interests in 2009 from BNSF).

3. *Good quality photographs (actual photographic prints, not photocopies) of railroad structures on the property that are 50 years old or older and of the immediately surrounding area.*

AECOM prepared a Historic Resource Inventory of the Snohomish Segment (Appendix D). AECOM Architectural Historians Autumn Buckridge and Caitlyn Fischman conducted a field survey of the project Area of Potential Effect (APE), and conducted documentary research on Washington State's Department of Archaeology and Historic Preservation (DAHP) database to determine if the railroad, bridges, overcrossing, and other historic structures within the APE had previously been documented.

The Historic Resources Inventory Report, Appendix D, includes photos and descriptions of the rail line. Qualifying structures include the following:

- Seattle Lake Shore & Eastern (SLS&E) Segment (MP 26.38 to MP 38.25)
- AECOM considers the State Route 522 Overcrossing (Bridge Number 522/134) and the Snohomish River Bridge to be not eligible for listing on the National Register of Historic Places (NRHP). Snohomish County does not propose to conduct salvage activities on either of the bridges that are more than 50 years old.

4. *The date(s) of construction of the structure(s), and the date(s) and extent of any major alterations, to the extent such information is known.*

The Snohomish Segment was constructed circa 1888. Six wood trestle bridges at MP 34.3, 35.9, 37.1, 37.2, 37.4, and 37.5 were also constructed circa 1888. The Snohomish River Railroad Bridge was reconstructed in 1912 (Bridge Hunter 2023). The State Route 522 Rail Overcrossing (Bridge Number 522/134) was constructed in 1962 (WSDOT 2023). The original rails, ties, and fasteners have all been replaced as part of routine maintenance, including some relocations and replacement of low trestles with fill. Several extant base plates feature makers marks dating them to 1941, 1945, 1948, 1949, and 1969. Some historical railroad switches were modified or replaced at an unknown time. The dates of rail and wood tie replacements are unknown; however, railroad ties are typically replaced every 30 to 50 years (RTA 2023). Both wood and metal ties have been used as replacements on the Snohomish Segment. There are fourteen grade crossings along the segment in a variety of materials, including concrete, asphalt, gravel, and wood. The wood grade crossing at MP 36.4 appears to retain some original design and materials, but all other crossings have been modified at unknown dates. Eight modern railroad crossing arms and lights have been installed where the segment intersects surface streets (dates unknown). The Snohomish River Bridge does not appear to have any major alteration subsequent to 1912; however, the wood ties, rails, and fasteners have likely been replaced as part of routine

maintenance. The State Route 522 overcrossing does not appear to have any major alterations; however, the safety railings on both sides of the bridge appear to have been replaced within the last 5 years, and the ties, rails, and fasteners have also been replaced as part of routine maintenance. Since their original construction in 1888, the wood trestle bridges have had numerous in-kind replacements but retain their overall original design, materials, and workmanship. Other alterations include the addition of safety railings and signage (dates unknown).

5. *A brief narrative history of carrier operations in the area, and an explanation of what, if any, changes are contemplated as a result of the proposed action.*

The Snohomish Segment was constructed circa 1888 as part of the SLS&E network's north division. By July 1889, Northern Pacific acquired a majority interest in SLS&E and began leasing the line (Armbruster 1999, 137). On May 1, 1892, SLS&E's operations were consolidated with Northern Pacific's (King County Parks 2015, 11). At that time, SLS&E's holdings spanned 227 miles of track (Robertson 1995, 266-267). On May 16, 1896, SLS&E entered foreclosure proceedings and the company's holdings were split between two companies. The newly formed Seattle & International Railway Company acquired the tracks in Western Washington and the Spokane & Seattle Railway received the Eastern Washington tracks (King County Parks 2015, 11). The Seattle & International Railway was backed by supporters of the Northern Pacific who sought to acquire SLS&E's holdings in western Washington. On April 1, 1901, the Seattle & International Railway became the Seattle division of the Northern Pacific (Armbruster 1999, 140). Within about 15 years of the acquisition and reorganization, Northern Pacific conducted improvements to the line in the project area, including the construction of two bridges in 1912.

Northern Pacific continued operating on the former SLS&E lines through the mid-twentieth century. Freight and passenger traffic began decreasing in the 1960s because of the developing interstate highway system. In 1970, Northern Pacific; Chicago, Burlington and Quincy; Great Northern; Spokane, Portland, and Seattle; and Pacific Coast railroads merged to form Burlington Northern Railroad. In 1996, Burlington Northern merged with the Atchison, Topeka, and Santa Fe Railway to become Burlington Northern Santa Fe (BNSF) (BNSF 2021, 4-5).

By the 1980's, BNSF's predecessors had abandoned trackage from the Skagit County border with Snohomish County south as far as the City of Snohomish at approximately MP 39. Snohomish County acquired that property post-abandonment and began developing it in 1989 as the "Centennial Trail," named in honor of Washington State's centennial that year (Snohomish County 2023).

In 2004, BNSF obtained abandonment authorization for an additional segment in the City of Snohomish from MP 39 south across the Snohomish River to MP 38.01. The railroad indicated in its filings that this segment had not been used for at least 2 years. After several extensions of

time, BNSF in July 2008 filed notice of consummation only for MP 38.25 to MP 39 and subsequently sold this portion to the City of Snohomish.

By 2003, the main purpose of (revenue source for) the line was to move certain fuselages from Boeing's Everett plant to its Renton plant for final assembly. Bridge reconfigurations rendered this use redundant, and BNSF indicated its intent to divest itself of roughly 42 miles of the line from the City of Snohomish south to Renton in east King and south Snohomish Counties, citing insufficient local traffic to justify continued operation and maintenance. BNSF asked local governments if there was interest in preserving the extensive facility for other transportation purposes. The Puget Sound Regional Council (PSRC) initially communicated regional interest in preserving the corridor to BNSF in July 2004, and instituted a study. In 2007, the PSRC issued the BNSF Corridor Preservation Study Final Report. In sum, the Final Report recommended public acquisition to preserve the line, with the portion south of the City of Woodinville being immediately railbanked under the federal railbanking statute for trail and transit purposes, while the portion of line north of Woodinville could continue in freight rail use so long as it was economically viable (Short 2007).

The Port of Seattle and King County ultimately entered into transactions for preservation of the rail corridor. The Port of Seattle and King County acquired BNSF's interests south of Woodinville and inclusive of the "Redmond Spur," subject to this Board's orders authorizing abandonment and railbanking. These rail lines are now being developed for trail and transit (light rail) uses by King County, local communities, and Sound Transit. The portion of line from MP 23.8 (Woodinville) north to MP 38.25 (City of Snohomish) is sometimes called the "freight segment." As to that segment, BNSF sold all of its interests to the Port of Seattle (including track and ties), but retained an exclusive freight easement. BNSF transferred its retained freight easement to GNP RLY, Ltd. (GNP). The Port of Seattle subsequently transferred its underlying interest in the King County portion of the freight segment to Woodinville, and its underlying interest in the Snohomish County portion of the segment to Snohomish County. Freight traffic on the freight segment gradually fell off to around 100 carloadings or less per year. During this interval, GNP was declared bankrupt, and its assets were taken over by Eastside Community Rail (ECR). However, ECR's STB license to acquire and operate the line was revoked ab initio by STB due to false and misleading representations as to ownership issues in the ECR's filings with STB. After an initial embargo due to bridge damage, the lessee of the line (Ballard Terminal Railroad Company [BTRC]) issued a final embargo, effective August 1, 2020, of the entire line due to "track conditions." Freight service never resumed. STB revoked BTRC's lease and operating exemption for the same reasons that ECR's license was revoked. GNP (under new ownership) again became the sole STB-licensed owner and operator for the line.

GNP subsequently sought a 2-year out-of-service exempt abandonment for the Woodinville portion of the freight segment in King County and consented to railbank that segment with Woodinville. Railbanking has now been consummated as to that segment.

GNP's only remaining rail line is the freight segment (former BNSF "retained exclusive freight rail easement") in Snohomish County (MP 38.25 to MP 26.38 at the King/Snohomish County line). The underlying deed from BNSF to the Port of Seattle that created the retained freight rail easement in Snohomish County contains a "covenant running with the land" providing that BNSF (or any successor) must consent to railbanking of the line in any applicable abandonment or adverse abandonment proceeding in the event of cessation of freight rail use of the line. Freight rail use ceased more than 3 years ago. Snohomish County as successor to the Port of Seattle has undertaken the filing of an adverse abandonment proceeding, and has committed to seeking railbanking. The County and GNP have entered into a settlement agreement in which GNP has committed to consent to railbanking, and the two parties have entered into a railbanking agreement, subject to authorization by STB in the proceeding for which this Historic Report has been prepared (AB 1331). The County believes this outcome is fully consistent with the recommendations of the PSRC Final Report and prior successful efforts to preserve the entire line for trail, transit, and other compatible purposes under the federal railbanking statute. Railbanking the Snohomish portion of the freight easement will also retain STB jurisdiction over the property so as to prevent any loss of such jurisdiction as to railbanked segments south of the King/Snohomish County line.

6. *A brief summary of documents in the carrier's possession, such as engineering drawings, that might be useful in documenting a structure that is found to be historic.*

The only document relating to the rail line and associated structures in the County's possession is the purchase agreement from the Port of Seattle (2016). Other available documentation includes a 2017 Historic Property Inventory Report (#708938) that recorded a segment of the BNSF Railway (formerly SLS&E) (Kramer 2017). The segment was evaluated as NRHP-eligible under Criterion A.

7. *An opinion (based on readily available information in the railroad's possession) as to whether the site and/or structures meet the criteria for listing on the National Register of Historic Places (36 CFR 60.4), and whether there is a likelihood of archeological resources or any other previously unknown historic properties in the project area, and the basis for these opinions (including any consultations with the State Historic Preservation Office, local historical societies or universities).*

AECOM recommends the Snohomish Segment as eligible for the NRHP under Criterion A in the areas of commerce, transportation, and community development. See the Historic Resource Inventory Report, Appendix D, for more details.

The Snohomish Segment traverses an area that contains cultural and archaeological resources of importance to several Indian tribes.

The County believes that the proposed action will not adversely affect any historic properties or tribal archaeological resources on the Snohomish Segment because no salvage of track materials or associated ground disturbance will occur as part of the action.

AECOM on behalf of Snohomish County reached out to the Washington State Historic Preservation Officer (SHPO) at the Washington DAHP and to the chairs and cultural resource directors of eight Indian Tribes with historic roots in the Snohomish/ south Snohomish County area. These letters describe the proposed project and request guidance in identifying any potential impacts to cultural or historic resources (Appendix B). As of the date of this Historic Report, no tribes have responded to our inquiry, apart from one email identifying a correct point of contact for the project.

On July 7, 2023, Maureen Elenga at DAHP responded by letter (Appendix C) that if the project is abandonment only, it will potentially be viewed as an adverse effect, as abandonment without a railbanking agreement or interpretive plan in place does not preserve the historic corridor. However, if the project is for railbanking, the abandonment will likely not be viewed as an adverse effect under the following circumstances:

- Preservation of the original corridor alignment.
- No removal or alteration of NRHP-eligible railroad bridges in the subject rail segment/APE.
- Development of an interpretive plan for the rail line following abandonment or railbanking.

As of the date of this Historic Report, the County has entered into a railbanking agreement. The County intends to preserve the original corridor alignment, and has no plans to undertake removal or alteration of any bridges. If the County decides to remove rail and ties or to deck the bridge for pedestrian/bicycle use, it would be in a separate action subject to DAHP review. The County intends to incorporate the future facility into the existing Centennial Trail (originally part of the same line that the property at issue in this proceeding is part of), which enters into the City of Snohomish from the north. The property at issue in this proceeding will extend the Centennial Trail to the Snohomish/King County line, where it is expected to intersect additional railbanked sections of the line. The County will develop an interpretive plan following railbanking. Therefore, all conditions specified in the DAHP letter for a finding of no adverse effect are fulfilled. Under STB rules (primarily CFR 1152.29) and procedures, railbanking may only happen after a line has been authorized for abandonment.

8. *A description (based on readily available information in the railroad's possession) of any known prior subsurface ground disturbance or fill, environmental conditions (naturally occurring or manmade) that might affect the archeological recovery of resources (such as swampy conditions or the presence of toxic wastes), and the surrounding terrain.*

AECOM conducted a records search of DAHP's online Washington Information System for Architectural and Archaeological Records Data (WISAARD) on July 13 and July 17, 2023. The search was performed to determine if any prior cultural resources inventories were conducted and if any previously recorded archaeological sites, cemeteries, or traditional cultural properties have been documented in the project APE and within 0.5 mile of the APE.

AECOM did not discover any environmental conditions within the APE that might affect the recovery of archaeological material. No previous ground disturbance other than that undertaken for routine maintenance on the rail line was observed during survey.

The records search identified 17 prior cultural resources investigations (Table 1), 7 recorded sites (Table 2), and 2 cemeteries (Table 3) within 0.5 mile of the APE. No traditional cultural properties have been recorded within 0.5 mile of the APE.

The 17 previously conducted investigations included surveys or monitoring performed for housing and community development, highway and bridge infrastructure, and utilities. Of those, 8 resulted in a positive finding for archaeological resources. One prior cultural resource investigation (the Snohomish Riverfront Trail Project [Dugas 2001]) overlaps the APE; the rest are outside the APE but are within 0.5 mile of it.

Table 1. Previous Cultural Resource Investigations within 0.5 Mile of the Project APE

Title of Report	Author	Date	Finding	NADB No.
Cultural Resource Assessment for Snohomish Riverfront Trail Project	Dugas	2001	Negative	1343355
To Brad Nelson, City of Snohomish, Regarding Determination of the Existence of Human Remains, Old City Cemetery (Revised)	Sharp	1998a	Positive	1343360
To Brad Nelson, City of Snohomish, Regarding Determination of the Existence of Human Remains, Old City Cemetery	Sharp	1998b	Positive	1343361
Report of the Magnetometer Survey at the Site of the Snohomish Senior Center	Bell	1998	Positive	1343364

Title of Report	Author	Date	Finding	NADB No.
Letter to Brad Nelson, City of Snohomish, Regarding Determination of the Existence of Human Remains at the City of Snohomish Senior Center and proposed Youth Center Property: Magnetometer Survey and Testing	Sharp	1998c	Positive	1343366
Letter to Jodie Peotter Regarding Snohomish Firehouse #SNO-101B Section 106 Report	Pinyerd	2004	Negative	1343625
Cultural Resource Assessment for the Snohomish Senior Center at 506 Fourth Street, Snohomish	Gillis	2006	Negative	1348182
Cultural Resources Survey and Evaluation for the Snohomish Gas Main Pipeline Replacement Project	Kaehler	2007	Positive	1350133
Phase I Investigations for Decertification for the Old Snohomish Cemetery, Snohomish	Tallman	2006	Positive	1350381
Letter to Scott Van Aeist Regarding Archaeological Monitoring for the Pilchuk Veterinary Hospital Waterline Replacement Project	Tatum	2007	Negative	1350610
Cultural Resource Assessment of Intersection Improvements at 2 nd Street & Lincoln Avenue, Snohomish, Washington	Merrill	2011	Negative	1680561
Cultural Resources Survey: Proposed Telecommunications Tower Site; Site Name; SEA Bromart – New Build Snohomish	Baker	2015	Negative	1686797
Re: Pilchuck Center Archaeological Monitoring, City of Snohomish (Tax Parcel ID # 00475800100100)	Iversen	2010	Negative	1687024
Cultural Resources Assessment for the Pilchuck Park Access Road Relocation, Pilchuck River Bank Erosion 30% Design Project Phase I, City of Snohomish, Snohomish County, Washington	Kretzler	2022	Negative	1697233
WDFW City of Snohomish Access and Boat Ramp Project	Kelly	2015	Positive	1686987
Letter Report to Steve Shipe RE: Addendum to SR 9: SR 522 to 212 th Street Widening Project	McKenney	2004	Negative	1351993
Memo to Rob Whitlam and Mike Aubele RE: Archaeological Inventory for the Additional Equipment Staging Area of Potential Effect Located at 8323 Maltby Road	Gilpin	2012	Positive	1682121

There are no recorded archaeological sites in the APE and seven archaeological sites within 0.5 mile of the APE (Table 2). Two recorded cemeteries are outside the APE but within 0.5 mile of it. There are no additional archaeological sites, cemeteries, or traditional cultural properties listed in the King and Snohomish County registers that are in or within 0.5 mile of the APE.

Table 2. Recorded Archaeological Resources within 0.5 Mile of the Project APE

NRHP Register Status	Site Number	Site Name	Site Type	Description
Determined Not Eligible; Potentially Eligible	45-KI-536	Railway Grade of the Seattle, Lake Shore & Eastern Railroad	Historic	SLS&E historic railroad trestles and grade, railroad telephone poles, 1895-1970
Unevaluated	SN00112	N/A	Historic	Blackman Museum
Unevaluated	SN00113	N/A	Historic	Willis D. Tucker Home
Unevaluated	SN00330	N/A	Historic	3 rd Street site, historic objects
Potentially Eligible	SN00645	N/A	Historic	Historic industrial piers/pilings ca. pre-1940
Unevaluated	SN00021	N/A	Precontact	Heavily patinated basalt point
Potentially Eligible	SN00599	N/A	Historic Debris Scatter	Historic debris scatter ca. 1905-1960

Resource 45-KI-536 is the record containing sections of the subject property, the SLS&E Railroad, compiled under a single site number. The combined segments do not include any portions that overlap the APE; however, the record contains documentation for pilings associated with the railroad recorded as part of the Snohomish Riverfront Trail Project, Snohomish County, Washington Cultural Resource Assessment near the north end of the APE.

Five of the archaeological sites are historic, including two buildings, two historical debris scatters, and one set of historical industrial piers or pilings. Recorded as part of a Puget Sound Energy pipeline project in 2012, site SN00599 (a historical debris scatter) was observed approximately 20 centimeters below the surface during shovel probing activities. Located west of the APE, no collection occurred at the site, and the site was not evaluated for the NRHP, although it is listed as potentially eligible by DAHP under the Archy Detail Legacy project (Gilpin 2012).

Recorded as part of a Washington Department of Fish and Wildlife project in 2015, site SN00645 is a section of historic industrial pilings northeast of the APE along the Snohomish River. No collection occurred at the site and the site was not evaluated for the NRHP, although it is listed as potentially eligible by DAHP under the Archy Detail Legacy project (Kelly 2015).

The single precontact site, SN00021, was originally recorded as a “heavily patinated basalt point” in 1961 (L. E. E. 1961). An attempted relocation of the site occurred in 1991, with no evidence of the original site found. No collection occurred at the site, and the site was not evaluated for the NRHP, although it is listed as potentially eligible by DAHP under the Archy Detail Legacy project (Obermayr 1991).

Recorded during Phase I Investigations for its decertification in 2006, resource SN00050 is a pioneer-era cemetery, circa 1866-1923 (Table 3). At the time of recording, the cemetery was described as the Old Snohomish Cemetery at 171 Cypress Street, Snohomish, Washington. The cemetery likely contains precontact as well as historic burials, although 136 individuals were removed in 1947 to facilitate the construction of State Highway 15 through the cemetery. As a result of the study, the Snohomish Senior Center was relocated from the site of the old cemetery and the property vacated (Tallman 2006).

The record for Bear Creek Cemetery contains reference data only and does not appear to be part of a cultural resource investigation. The resource is a pioneer-era cemetery circa 1899-present that encompasses 1.36 acres in Maltby, Washington (Bear Creek Cemetery 2015).

Table 3. Recorded Cemetery Resources within 0.5 Mile of the Project APE

NRHP Register Status	Site Number	Site Name	Site Type	Description
Unevaluated/Not Listed	SN00050	Old Snohomish Cemetery	Historic/Contemporary	Pioneer Cemetery
Unevaluated/Not Listed	SN00498	Bear Creek Cemetery	Historic/Contemporary	Pioneer Cemetery

9. *Within 30 days of receipt of the historic report, the State Historic Preservation Officer may request the following additional information regarding specific non railroad owned properties or groups of properties immediately adjacent to the railroad right-of-way: photographs of specified properties that can be readily seen from the railroad right-of-way (or other public rights-of-way adjacent to the property) and a written description of any previously discovered archeological sites, identifying the location and type of the site (i.e. prehistoric or native American).*

The County does not foresee the likelihood that any additional information associated with the proposed line abandonment is necessary. However, if any additional information is requested, the County will provide it.

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LIST OF APPENDICES

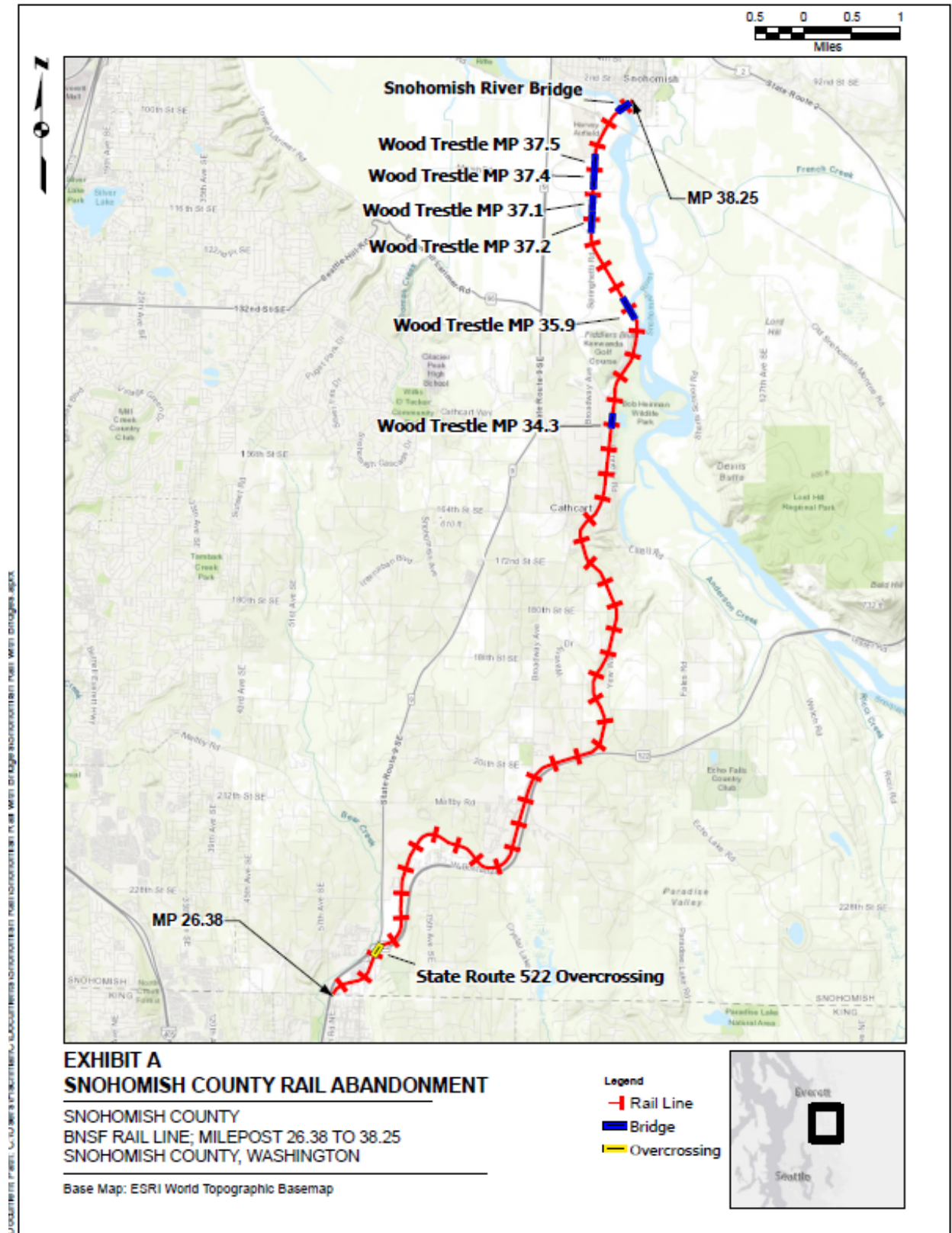
Appendix A – Project Area Map

Appendix B – Agency and Tribal Consultation Letters

Appendix C – Comments from Agencies and Tribes

Appendix D – Historic Resource Inventory Report

Appendix A – Project Area Map



Appendix B – Agency and Tribal Consultation Letters

Note: Each letter in this appendix was sent to the recipient with a map of the line as an enclosure, which has been included here only after the first letter to avoid repetition. Each letter received the same map as an enclosure.



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Kerri Woehler, Director
Washington Department of Transportation
Multimodal Planning Division
P.O. Box 47370
Olympia, WA 98504-7370

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Kerri Woehler:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

Rail use of the northernmost portion (i.e., roughly the intersection with the BNSF mainline south of Snohomish and MP 38.25) of the Snohomish Segment ceased over a decade ago, and use of the remainder of the line ceased in August, 2020. The segment is part of the larger Eastside Rail Corridor, which was purchased from BNSF Railway by the Port of Seattle in 2009, subject to a rail freight easement held by GNP on the Snohomish Segment. The County views the underlying deeds to provide for railbanking and trail use of the property pursuant to 16 United States Code 1247(d) in the event the Surface Transportation Board authorizes abandonment and the County requests railbanking as it so intends.

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A copy of the Environmental/Historic Report will be forwarded to you at least 20 days before The County's application is filed at the Surface Transportation Board. If you have any questions about the proposal or this request, please contact me by email or phone. Thank you for your contribution.

Sincerely,



Kim Anderson
Ecologist
Kimberly.anderson@aecom.com
206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange

Enclosure

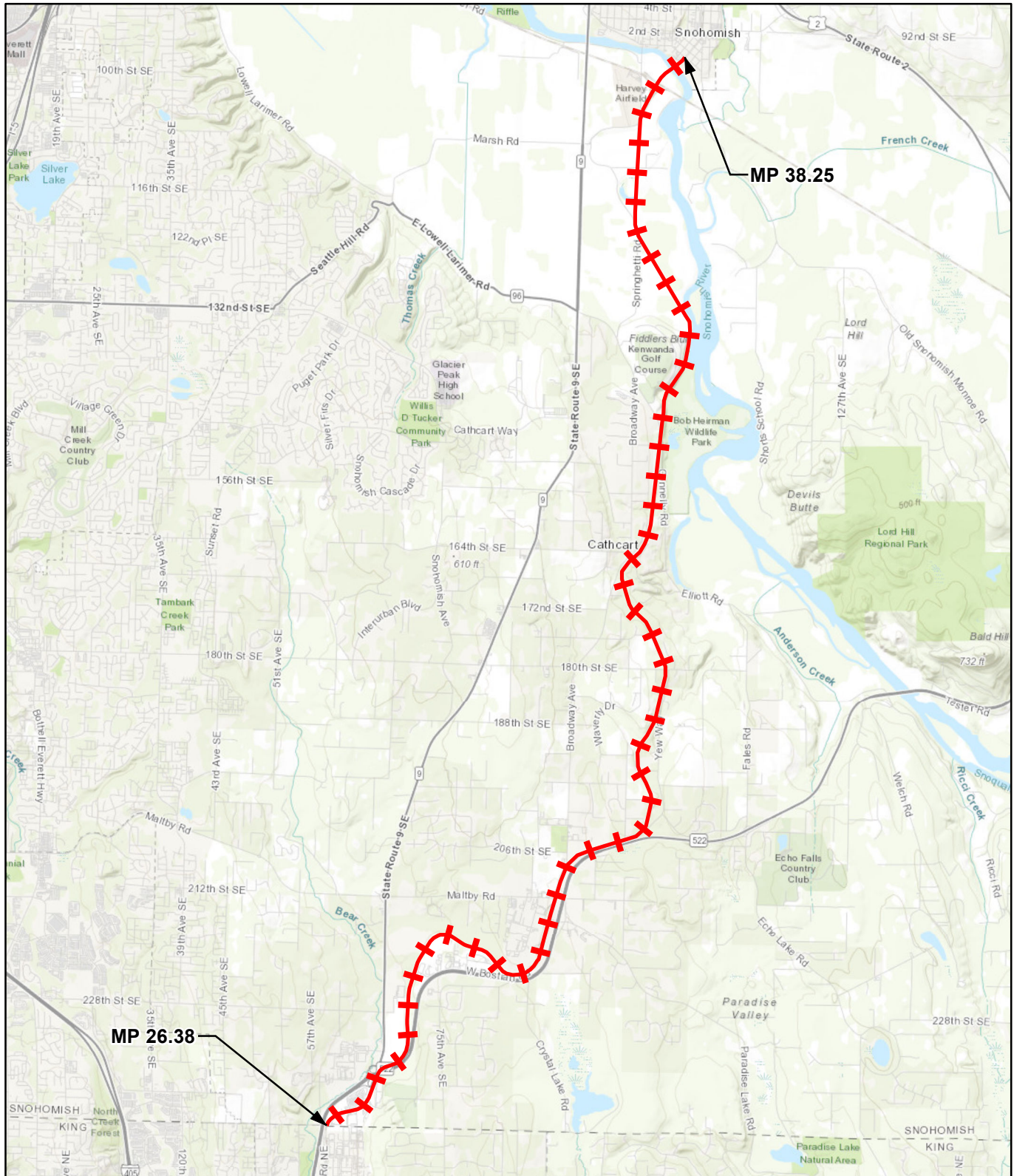
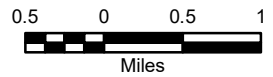


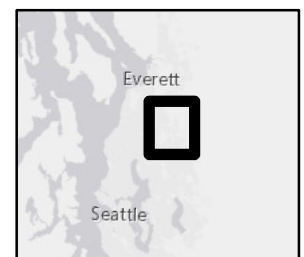
EXHIBIT A SNOHOMISH COUNTY RAIL ABANDONMENT

SNOHOMISH COUNTY
BNSF RAIL LINE; MILEPOST 26.38 TO 38.25
SNOHOMISH COUNTY, WASHINGTON

Base Map: ESRI World Topographic Basemap

Legend

+ Rail Line





AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Mike McCrary, Director
Snohomish County Planning and Development Services
3000 Rockefeller Avenue
Everett, WA 98201

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Mike McCrary:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Sincerely,

A handwritten signature in black ink that reads "Kim Anderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kim Anderson
Ecologist
Kimberly.anderson@aecom.com
206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Brooke Eidem, Planning Director
City of Snohomish
Planning and Development Services Department
P.O. Box 1589
Snohomish, WA 98290

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Brooke Eidem:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Kim Anderson

Ecologist

Kimberly.anderson@aecom.com

206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Robert Grumbach
City of Woodinville
Development Services Department
17301 - 133rd Ave NE
Woodinville, WA 98072

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Robert Grumbach:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Kim Anderson

Ecologist

Kimberly.anderson@aecom.com

206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Dave Somers
Snohomish County Executive
Chinook Office Building
3000 Rockefeller Avenue M/S 407
Everett, WA 98201

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Dave Somers:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Kim Anderson

Ecologist

Kimberly.anderson@aecom.com

206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Josh Brown
Executive Director
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Josh Brown:

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Kim Anderson

Ecologist

Kimberly.anderson@aecom.com

206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Communications and Outreach Branch
NOAA, N/NGS12
National Geodetic Survey, SSMC3 #8716
1315 East-West Highway
Silver Spring, MD 20910-3282

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

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Kim Anderson
Ecologist
Kimberly.anderson@aecom.com
206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Terry Cosby
USDA NRCS Office of the Chief
1400 Independence Ave., SW
Room 6149-S
Washington, DC 20250

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Terry Cosby:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Sincerely,



Kim Anderson

Ecologist

Kimberly.anderson@aecom.com

206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Lynn Khuat
Resource Conservationist
NRCS Renton Service Center
941 Powell Ave SW, Suite 102
Renton, WA 98057

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Lynn Khuat:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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A copy of the Environmental/Historic Report will be forwarded to you at least 20 days before The County's application is filed at the Surface Transportation Board. If you have any questions about the proposal or this request, please contact me by email or phone. Thank you for your contribution.

Sincerely,



Kim Anderson

Ecologist

Kimberly.anderson@aecom.com

206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Loreé Randall
Federal Consistency Coordinator
Washington State Coastal Zone Management Program
PO Box 47600
Olympia, WA 98504

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Loreé Randall:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Sincerely,



Kim Anderson

Ecologist

Kimberly.anderson@aecom.com

206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Kate Norman
U.S. Fish and Wildlife Service
Pacific Region 1
Assistant Regional Director of Ecological Services
911 NE 11th Avenue, 5th Floor
Portland, OR 97232-4181

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Kate Norman:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Sincerely,



Kim Anderson

Ecologist

Kimberly.anderson@aecom.com

206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Jennifer Quan
Regional Administrator
NOAA Fisheries
West Coast Regional Office
1201 Northeast Lloyd
Portland, OR 97232

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Jennifer Quan:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Sincerely,



Kim Anderson
Ecologist
Kimberly.anderson@aecom.com
206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Miles Penk
Washington Department of Fish and Wildlife
North Puget Sound Regional Office
16018 Mill Creek Blvd.
Mill Creek, WA 98012-1541

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Miles Penk:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Sincerely,

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Kim Anderson

Ecologist

Kimberly.anderson@aecom.com

206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

David Siegenthaler
Regional Program Manager, Federal Lands to Parks Program
National Park Service
909 First Avenue, 5th Floor
Seattle, WA 98104

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear David Siegenthaler:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Sincerely,

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Kim Anderson

Ecologist

Kimberly.anderson@aecom.com

206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Megan Duffy
Director
Washington Recreation and Conservation Office
P.O. Box 40917
Olympia, WA 98504-0917

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Megan Duffy:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Sincerely,



Kim Anderson
Ecologist
Kimberly.anderson@aecom.com
206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Meg Bommarito
Regional Planner
Washington Department of Ecology
Northwest Regional Office
P.O. Box 330316
Shoreline, WA 98133-9716

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Meg Bommarito:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Sincerely,

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Kim Anderson

Ecologist

Kimberly.anderson@aecom.com

206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Mae Ancheta
U.S. Army Corps of Engineers
Seattle District
P.O. Box 3755
Seattle, WA 98124-3755

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Mae Ancheta:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Sincerely,

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Kim Anderson

Ecologist

Kimberly.anderson@aecom.com

206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Casey Sixkiller
Acting Administrator
U.S. EPA, Region 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Casey Sixkiller:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Sincerely,



Kim Anderson

Ecologist

Kimberly.anderson@aecom.com

206-724-6023

Cc: Sean Reay, Snohomish County
Charles Montange



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Washington Department of Archaeology & Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

Via email: 106@dahp.wa.gov

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Dr. Brooks:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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In advance of preparing an Environmental/Historic Report, the County is advising you of the proposed abandonment so that you may assist us in identifying any concerns your agency may have about potential effects of the action on historic resources. We appreciate your review and any comments you may wish to offer. We request a written response as soon as possible, but no later than July 31, 2023, so that we may include it in the Environmental/Historic Report.

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Sincerely,

A handwritten signature in black ink, appearing to read 'Timothy Wood', written in a cursive style.

Tim Wood
Architectural Historian
timothy.wood@aecom.com
971-323-6357

Cc: Sean Reay, Snohomish County
Charles Montange

Enclosure



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Laura Murphy
Archaeologist
Muckleshoot Indian Tribe
39015 172nd Ave SE
Auburn, WA 98092

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Laura Murphy:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

Rail use of the northernmost portion (i.e., roughly the intersection with the BNSF mainline south of Snohomish and MP 38.25) of the Snohomish Segment ceased over a decade ago, and use of the remainder of the line ceased in August, 2020. The segment is part of the larger Eastside Rail Corridor, which was purchased from BNSF Railway by the Port of Seattle in 2009, subject to a rail freight easement held by GNP on the Snohomish Segment. The County views the underlying deeds to provide for railbanking and trail use of the property pursuant to 16 United States Code 1247(d) in the event the Surface Transportation Board authorizes abandonment and the County requests railbanking as it so intends. Although not part of the rail abandonment action, future development of a trail along the Snohomish Segment will likely include replacement of culverts, which will be addressed separately as a future project.

In advance of preparing an Environmental/Historic Report, the County is advising you of the proposed abandonment so that you may assist us in identifying any concerns your agency may have about potential impacts to cultural or natural resources. We appreciate your review and any comments you may wish to offer. We request a written response as soon as possible, but no later than July 31, 2023, so that we may include it in the Environmental/Historic Report. Snohomish County will continue to contact the Muckleshoot Tribe throughout the rail abandonment process and regarding future projects that will involve the Snohomish Segment. If you have any questions about the proposal or this request, or if you wish to consult directly with the County, please contact me by email or phone. Thank you for your contribution.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Wood", with a stylized flourish at the end.

Tim Wood
Architectural Historian
timothy.wood@aecom.com
971-323-6357

Cc: Sean Reay, Snohomish County
Charles Montange

Enclosure



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Steven Mullen Moses
Department of Archaeology and Historic Preservation Director
Snoqualmie Indian Tribe
P.O. Box 969
Snoqualmie, WA 98065

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Steven Mullen Moses:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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In advance of preparing an Environmental/Historic Report, the County is advising you of the proposed abandonment so that you may assist us in identifying any concerns your agency may have about potential impacts to cultural or natural resources. We appreciate your review and any comments you may wish to offer. We request a written response as soon as possible, but no later than July 31, 2023, so that we may include it in the Environmental/Historic Report. Snohomish County will continue to contact the Snoqualmie Tribe throughout the rail abandonment process and regarding future projects that will involve the Snohomish Segment. If you have any questions about the proposal or this request, or if you wish to consult directly with the County, please contact me by email or phone. Thank you for your contribution.

Sincerely,

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Tim Wood
Architectural Historian
timothy.wood@aecom.com
971-323-6357

Cc: Sean Reay, Snohomish County
Charles Montange

Enclosure



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Richard Young
Cultural Resource Manager
Tulalip Tribes
Hibulb Cultural Center & Natural History Preserve
6410 23rd Avenue NE
Tulalip, WA 98271

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Richard Young:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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development of a trail along the Snohomish Segment will likely include replacement of culverts, which will be addressed separately as a future project.

In advance of preparing an Environmental/Historic Report, the County is advising you of the proposed abandonment so that you may assist us in identifying any concerns your agency may have about potential impacts to cultural or natural resources. We appreciate your review and any comments you may wish to offer. We request a written response as soon as possible, but no later than July 31, 2023, so that we may include it in the Environmental/Historic Report. Snohomish County will continue to contact the Tulalip Tribes throughout the rail abandonment process and regarding future projects that will involve the Snohomish Segment. If you have any questions about the proposal or this request, or if you wish to consult directly with the County, please contact me by email or phone. Thank you for your contribution.

Sincerely,

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Tim Wood
Architectural Historian
timothy.wood@aecom.com
971-323-6357

Cc: Sean Reay, Snohomish County
Charles Montange

Enclosure



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Ryan Miller
Environmental Liaison
Tulalip Tribes
6406 Marine Dr.
Tulalip, WA 98721

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Ryan Miller:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Wood", written in a cursive style.

Tim Wood
Architectural Historian
timothy.wood@aecom.com
971-323-6357

Cc: Sean Reay, Snohomish County
Charles Montange

Enclosure



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Dennis Lewarch
Tribal Historic Preservation Officer
Suquamish Tribe
P.O. Box 498
Suquamish, WA 98392

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Dennis Lewarch:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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In advance of preparing an Environmental/Historic Report, the County is advising you of the proposed abandonment so that you may assist us in identifying any concerns your agency may have about potential impacts to cultural or natural resources. We appreciate your review and any comments you may wish to offer. We request a written response as soon as possible, but no later than July 31, 2023, so that we may include it in the Environmental/Historic Report. Snohomish County will continue to contact the Suquamish Tribe throughout the rail abandonment process and regarding future projects that will involve the Snohomish Segment. If you have any questions about the proposal or this request, or if you wish to consult directly with the County, please contact me by email or phone. Thank you for your contribution.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Wood", with a stylized flourish at the end.

Tim Wood
Architectural Historian
timothy.wood@aecom.com
971-323-6357

Cc: Sean Reay, Snohomish County
Charles Montange

Enclosure



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Kerry Lyste
Tribal Historic Preservation Officer
Stillaguamish Tribe
P.O. Box 277
Arlington, WA 98223

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Kerry Lyste:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Wood", with a stylized flourish at the end.

Tim Wood
Architectural Historian
timothy.wood@aecom.com
971-323-6357

Cc: Sean Reay, Snohomish County
Charles Montange

Enclosure



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Rhonda Foster
Tribal Historic Preservation Officer
Squaxin Island Tribe
10 SE Squaxin Lane
Shelton, WA 98584

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Rhonda Foster:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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In advance of preparing an Environmental/Historic Report, the County is advising you of the proposed abandonment so that you may assist us in identifying any concerns your agency may have about potential impacts to cultural or natural resources. We appreciate your review and any comments you may wish to offer. We request a written response as soon as possible, but no later than July 31, 2023, so that we may include it in the Environmental/Historic Report. Snohomish County will continue to contact the Squaxin Island Tribe throughout the rail abandonment process and regarding future projects that will involve the Snohomish Segment. If you have any questions about the proposal or this request, or if you wish to consult directly with the County, please contact me by email or phone. Thank you for your contribution.

Sincerely,

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Tim Wood
Architectural Historian
timothy.wood@aecom.com
971-323-6357

Cc: Sean Reay, Snohomish County
Charles Montange

Enclosure



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Kevin Joseph
Tribal Historic Preservation Officer
Sauk-Suiattle Tribe
5318 Chief Brown Lane
Darrington, WA 98241

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Kevin Joseph:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Tim Wood
Architectural Historian
timothy.wood@aecom.com
971-323-6357

Cc: Sean Reay, Snohomish County
Charles Montange

Enclosure



AECOM
1111 Third Avenue
Suite 1600
Seattle, WA 98101
aecom.com

June 29, 2023

Josephine Jefferson
Tribal Historic Preservation Officer
Swinomish Indian Tribal Community
11367 Moorage Way
La Conner, WA 98257

Re: Surface Transportation Board Docket No. AB 1331—Snohomish County—Adverse
Abandonment GNP Rly. Inc., in Snohomish County, WA

Dear Josephine Jefferson:

AECOM sends this letter on behalf of Snohomish County (“the County”). The County intends to file a third-party, or “adverse,” application in the above-referenced docket for abandonment of approximately 11.9 miles of freight rail easement in Snohomish County, Washington (“the Snohomish Segment” or “line”). As shown in Exhibit A, the Snohomish Segment runs between Milepost 26.38 at the King-Snohomish County boundary line and Milepost 38.25 at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish. GNP owns a rail freight easement over the Snohomish Segment; the underlying property is owned by Snohomish County by reason of a deed from the Port of Seattle. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking. While future uses could require salvage of rails, ties, and other track materials, the County does not propose to conduct any salvage activities on the line as part of this action.

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Sincerely,

A handwritten signature in black ink, appearing to read 'Timothy Wood', with a stylized, cursive script.

Tim Wood
Architectural Historian
timothy.wood@aecom.com
971-323-6357

Cc: Sean Reay, Snohomish County
Charles Montange

Enclosure

Appendix C – Comments From Agencies and Tribes

From: [NOS NGS JIRA](#)
To: [Anderson, Kim](#)
Subject: [JIRA] (IMOV-14660) Letter for review and comment - rail adverse abandonment project in Snohomish County, WA
Date: Thursday, July 13, 2023 2:38:08 PM

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A comment is added on your issue:

Re: Letter for review and comment - rail adverse abandonment project in Snohomish County, WA

Good Afternoon Ms. Anderson,

Thank you for informing the National Geodetic Survey (NGS) of Snohomish County's decision to abandon approximately **11.9** miles of freight rail easement between **Milepost 26.38** at the King-Snohomish County boundary line and **Milepost 38.25** at approximately Commercial Street, somewhat north of the northern bank of the Snohomish River in the City of Snohomish, Snohomish County, Washington.

There could be geodetic survey marks located in the area described, and any marks still present could be disturbed by the abandonment. While it is illegal to disturb or destroy a mark, sometimes disturbing or destroying a mark is unavoidable. In such cases, the mark can often be preserved or reset with advanced planning. NGS provides the public with tools to search for and locate survey marks, see the NGS Data Explorer (<https://geodesy.noaa.gov/NGSDataExplorer/>).

If a mark will be disturbed by the abandonment, Snohomish County should consult with NGS at least 90 days prior to beginning salvage activities that will disturb, or destroy any geodetic marks identified nearby.

Information is available online to help reset marks or report disturbed/destroyed marks:

<https://geodesy.noaa.gov/surveys/mark-recovery/index.shtml>

<<https://www.google.com/url?q=https://geodesy.noaa.gov/surveys/mark-recovery/index.shtml&sa=D&ust=1560385764139000&usg=AFQjCNGDkoXCHtBcDJBsXm2KQLkhwYDxQ>>.

This notice is also being shared with Dan Determan (Dan.Determan@noaa.gov, 206-526-6874 (office), 202-306-6716 (cell)) the Regional Geodetic Advisor, so he may work with any interested local agencies or stakeholders.

If you have additional questions, email NGS.Infocenter@noaa.gov.

Sincerely,

Deborah M. Brooks
Communications Specialist
deborah.brooks@noaa.gov
301-832-1063

More information on preserving marks, mark resets, and destroyed marks.

Preserving Marks

Significant resources were invested to create an extensive geodetic network across the United States by establishing precise coordinates at physical survey marks. Disturbing or destroying these marks reduces geodetic control available to local surveyors, so please make every effort to preserve this valuable network.

Mark Resets

If a mark is about to be destroyed (e.g., due to planned construction), it may be possible to reset the mark and retain the geodetic control. Review the Bench Mark Reset Procedures

(
https://geodesy.noaa.gov/PUBS_LIB/Benchmark_4_1_2011.pdf) or contact your closest geodetic advisor (<https://geodesy.noaa.gov/ADVISORS/index.shtml>).

Please do not attempt to reset a mark that has been separated from the base. Any remnants of destroyed marks must be properly discarded and not reused in any manner, as this is a violation of Federal law.

Destroyed Marks

If it is determined that a mark has been destroyed, please provide enough photo evidence to show how this determination was made. To submit this information to NGS, follow the instructions regarding “destroyed marks” on the Mark Recovery Entry web page (https://geodesy.noaa.gov/cgi-bin/recvy_entry_www.prl)

From: [NOS NGS JIRA](#)
To: [Anderson, Kim](#)
Subject: [JIRA] (IMOV-14660) Letter for review and comment - rail adverse abandonment project in Snohomish County, WA
Date: Friday, July 21, 2023 8:06:06 AM

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A comment is added on your issue:

Re: Letter for review and comment - rail adverse abandonment project in Snohomish County, WA

Good Morning Ms. Anderson,

NGS found no (0) geodetic markers along the track segment that would jeopardized by the proposed abandonment.

Thanks again for contacting NOAA's National Geodetic Survey.

Deborah Brooks,
Communications Specialist
NGS Infocenter
301-713-3242
ngs.infocenter@noaa.gov

National Ocean Service (NOS) - National Geodetic Survey (NGS)

From: [Duffy, Megan \(RCO\)](#)
To: [Anderson, Kim](#)
Cc: [Sean Reay](#); [C. Montange](#); [Robinson, Scott \(RCO\)](#)
Subject: RE: Letter for review and comment - rail adverse abandonment project in Snohomish County, WA
Date: Thursday, July 13, 2023 2:34:57 PM

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Ms. Anderson –

We have conducted a review of the relevant properties and have no comment to offer at this time.

Thank you.

Megan Duffy

From: Anderson, Kim <kimberly.anderson@aecom.com>
Sent: Thursday, June 29, 2023 3:50 PM
To: Duffy, Megan (RCO) <megan.duffy@rco.wa.gov>
Cc: Sean Reay <sean.reay@co.snohomish.wa.us>; C. Montange <c.montange@frontier.com>
Subject: Letter for review and comment - rail adverse abandonment project in Snohomish County, WA

External Email

Hi Megan,

Attached please find for your review and comment a letter regarding a proposed rail line abandonment project in Snohomish County, Washington. We are also sending a hard copy of the letter to your office mailing address.

Sincerely,

Kim Anderson PWS
Ecologist and Project Manager, Environmental Planning and Permitting
M +1 206-724-6023
kimberly.anderson@aecom.com

AECOM
1111 Third Avenue
Suite 1600
Seattle, WA, United States



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

July 7, 2023

Tim Wood
AECOM
1111 Third Avenue, Suite 1600
Seattle, WA 98101

In future correspondence please refer to:
Project Tracking Code: 2023-07-04178
Property: Snohomish County Rail Abandonment
Re: Letter for review and comment - rail adverse abandonment project in Snohomish County, WA

Dear Tim Wood:

Thank you for informing DAHP of the proposed rail abandonment in Snohomish County and inviting comments in advance of consultation with DAHP. Initiation of consultation with DAHP begins with a letter addressed to the SHPO (sent electronically) describing the undertaking and proposing an Area of Potential Effects (APE) and survey methodology for identifying cultural resources and a request for concurrence from DAHP.

A cultural resources report prepared by an architectural historian meeting the Secretary of Interior Standards is vital to conducting a thorough review. Resources 50 years of age or older identified in the APE must be individually inventoried on Historic Property Inventory forms in DAHP's WISSARD database and appended to the cultural resources report. Once the report is submitted to DAHP, a letter requesting concurrence on its findings will inform us that the project is ready for review.

In addition to reviewing the report, DAHP will require detailed information about project activities and post-abandonment corridor use to assess the effects of the segment abandonment to historic resources.

If the project brought to DAHP for review is abandonment only, it will potentially be viewed as an adverse effect, as abandonment without a railbanking agreement or interpretive plan in place does not preserve the historic corridor; however, if the project brought to DAHP for review is abandonment for railbanking, the abandonment will likely not be viewed as an adverse effect under the following circumstances:

- Preservation of the original corridor alignment.
- No removal or alteration of NRHP-eligible railroad bridges in the subject rail segment/APE.
- Development of an interpretive plan for the rail line following abandonment or railbanking.

We appreciate the opportunity to comment on this project in advance of initiation of consultation with DAHP and look forward to reviewing the project for effects to historic resources. If you have any questions, feel free to contact me.

Sincerely,

Maureen Elenga, M.A.
Transportation Reviewer
(360) 972-4539
Maureen.Elenga@dahp.wa.gov



Appendix D – Historic Resource Inventory Report

Historic Resource Inventory of the Snohomish County Railroad
Abandonment Project, Snohomish County, Washington

Prepared for Snohomish County, Washington

August 18, 2023

Prepared By

AECOM

Historic Resource Inventory of the Eastside Rail Corridor Railroad Abandonment Project

Project:	Snohomish County Railroad Abandonment Project
Inventory Methods:	AECOM architectural historians performed the aboveground/built environment resources inventory July 11-12, 2023.
Location:	Township 27 North, Range 5 East, Sections 12, 24, 25, 26, 34, 35, Willamette Meridian Township 27 North, Range 6 East, Sections 6, 7, 18, 19, Willamette Meridian Township 28 North, Range 5 East, Sections 24, 25 Willamette Meridian Township 28 North, Range 6 East, Sections 18, 19, 30, 31 Willamette Meridian
USGS Quad:	Bothell, Maltby, and Snohomish
Cities:	Woodinville, Snohomish
County:	Snohomish
Area Surveyed:	11.9 miles along historic Seattle Lake Shore and Eastern Railway right-of-way in Snohomish County
Findings:	The Seattle Lake Shore and Eastern Railway segment between mileposts 26.38 and 38.25 is recommended as eligible for the National Register of Historic Places under Criterion A in the areas of Commerce, Transportation, and Community Development.
Preparers:	Autumn Buckridge, Caitlyn Fischman, Timothy Wood, M.S.
Organization:	AECOM

Introduction

AECOM completed a historic resources survey of the Seattle Lake Shore & Eastern (SLS&E) Railway between mileposts 26.38 and 38.25 (the Snohomish Segment) in Snohomish County, Washington. The segment includes the Snohomish River Railroad Bridge, six wood trestle bridges at mileposts 34.3, 35.9, 37.1, 37.2, 37.4, and 37.5, and the Washington State Route 522 rail overcrossing. Snohomish County (the County) intends to file a third-party, or “adverse,” application for abandonment of the segment. The County intends to use the Snohomish Segment for alternative public purposes, including interim trail use and railbanking following the proposed abandonment. Snohomish County anticipates developing a trail on the line, which will be part of both (1) the (currently) 30-mile long Centennial Trail and (2) “Eastrail,” a partially constructed 42-mile trail (with light rail components) project, currently under development. While future uses could require salvage of rails, ties, and other track materials, salvage activities are not proposed as part of this action. The Area of Potential Effects (APE) for the present project includes the historic SLS&E right-of-way between mileposts 26.38 and 38.25 in Snohomish County, Washington.

On July 11 and 12, 2023, AECOM Architectural Historians Caitlyn Fischman and Autumn Buckridge conducted a field survey of the project APE, including the Snohomish River Railroad Bridge, the six wood trestle bridges, and the State Route 522 rail overcrossing (Bridge Number 522/134). When observed, other features dating to the historical period were documented and photographed. On July 13, 2023, AECOM Architectural Historian Tim Wood conducted documentary research on the Washington State Department of Archaeology and Historic Preservation’s (DAHP) online Washington Information System for Architectural and Archaeological Records Data (WISAARD) to determine if the railroad, bridges, or any other historical built resources in the APE had been previously documented.

The adjacent SLS&E segment between mileposts 23.8 and 26.38, Renton and Woodinville, was evaluated in 2021 as eligible under National Register of Historic Places (NRHP) Criterion A at the local and state level as part of the larger SLS&E Company Railroad. This determination received concurrence from DAHP. A portion of the SLS&E segment between mileposts 26.38 and 38.25 was evaluated for the NRHP in 2017. The property was determined eligible under Criterion A.

The SLS&E Snohomish Segment between mileposts 26.38 and 38.25 is significant under NRHP Criterion A at the local and state level in the areas of Commerce, Transportation, and Community Development as part of the larger SLS&E Company Railroad. The following sections include a brief description of the SLS&E Snohomish Segment, historical context, and conclusions and recommendations. A map showing the segment and associated bridges and trestles and a Historic Property Inventory form for the SLS&E segment are also attached.

SLS&E Railway Snohomish Segment

The SLS&E Railway Snohomish Segment follows a roughly north-south alignment with termini at milepost 38.25 in Snohomish near the Snohomish River Bridge to the north and the King County-Snohomish County line at milepost 26.38 to the south. The segment consists of standard gauge rails and replacement pressure-treated wood and metal ties (Figure 1). The railroad track level varies in height along the segment. The northern portion of the segment goes through an agricultural area and is primarily at grade, with some sections elevated on structures. South of the agricultural area, the segment traverses undulating hills with cuts and fills as needed to meet the grade requirements. The segment features seven transfer tracks, six spurs, five historical model 112E standing railroad switches, and eight modern crossing arms

and lights. The railroad segment also crosses one steel truss bridge (circa 1912) (Figure 2), one concrete overcrossing (c. 1962) (Figure 3), six wood trestle bridges (circa 1888) (Table 1), and several streets and driveways to commercial, agricultural, residential, and industrial properties.



Figure 1: SLS&E Snohomish Segment south of milepost 34.3 showing typical standard-gauge rails with pressure-treated replacement wood ties and a typical whistle stop sign at right.

Table 1: Wood Trestle Bridges along the Snohomish Segment

Current Condition	Description	Location (milepost)	Length (feet)
	• Typical wood trestle construction • Pedestrian walkway along eastern side features metal safety railing and horizontal wood board planking • Single gauge railway with guard rail • Features milepost sign and no trespassing sign • Crosses agricultural area near 99th Ave. SE	37.5	365
	• Typical wood trestle construction • Pedestrian walkway along eastern side features metal safety railing and horizontal wood board planking • Single gauge railway with guard rail • Features milepost sign and no trespassing sign • Crosses agricultural area near 99th Ave. SE	37.4	400

Current Condition	Description	Location (milepost)	Length (feet)
	• Typical wood trestle construction • Safety railing and horizontal wood planking no longer extant, but wood beams extend off eastern side of bridge as remnants of former pedestrian walkway • Single gauge railway • Features milepost sign and no trespassing sign • Crosses Batt Slough	37.2	165
	• Typical wood trestle construction • No pedestrian walkway • Single gauge railway with guard rail • Features milepost sign and no trespassing sign • Crosses Batt Slough	37.1	645
	• Typical wood trestle construction • Safety railing and horizontal wood planking no longer extant, but wood beams extend off eastern side of bridge as remnants of former pedestrian walkway • Single gauge railway with guard rail • Features milepost sign • Crosses agricultural area between Springhetti Road to the west and Snohomish River to the east	35.9	1,000
	• Typical wood trestle construction • No pedestrian walkway • Single gauge railway • Features milepost sign and no trespassing sign • Crosses Connelly Road	34.3	60

Snohomish River Railroad Bridge

The Snohomish River Bridge in the City of Snohomish and Snohomish County, Washington is at milepost 38.0 of the Snohomish Segment. Access to the bridge was limited due to topography, safety concerns, and private property boundaries. Consultants inventoried this property from the nearest public access (the boat launch at Cady Park) approximately 260 feet northwest of the resource. Constructed circa 1912, the bridge is approximately 1,700 feet long, running northeast-southwest over the Snohomish River (Bridge Hunter 2023; Figure 2). The bridge has a 180-foot-long steel through truss central segment flanked by a 95-foot metal box girder segment to the south and a 200-foot metal deck truss segment to the north. Two open-pile wood trestle approach spans are on either side of the central bridge section. The wood trestles are composed of five vertical wood posts topped by a horizontal beam and reinforced with diagonal bracing on each side. The approach span on the south side is about 875 feet long, while the span on the north side extends to 1st Street and is approximately 535 feet long. The bridge is supported by four concrete piers. The southern concrete piers are rectangular, and the northernmost pier is octagonal. The octagonal pier bisects the deck truss segment and supports the bridge's original operator room. The bridge crosses over a section of Cady Park at the north end, and a segment of the Burlington Northern Santa Fe (BNSF) Railway at the south end. On each end of the bridge, the original wood abutment and wing walls are present, and are constructed with large wood vertical posts and horizontal wood planks to retain the soil.

Modifications to the bridge include replacement of the ties, rails, and fasteners as part of routine maintenance (dates unknown).



Figure 2: The Snohomish River Bridge, view facing south.

Washington State Route 522 Rail Overcrossing

The State Route 522 rail overcrossing (Bridge Number 522/134) was constructed in 1962, allowing passage of the former SLS&E line over the newly constructed state highway (Figure 3 and Figure 4) (WSDOT 2021). At approximately 295 feet long and 20 feet wide, the overcrossing is a metal box girder with a curved concrete deck and a concrete substructure with three evenly spaced rectangular plan concrete supports. Concrete abutments with wing walls support the overcrossing at each end. The overcrossing includes metal safety rails on each side with I-beam posts and metal tube rails. The segment features a single gauge railway with guard rails as it passes along the overcrossing. No major alterations are visible; however, the ties, rails, and fasteners have likely been replaced as part of routine maintenance, and the safety railings appear to have been replaced within the last 5 years.



Figure 3: The State Route 522 Rail Overcrossing, view facing northeast.



Figure 4: The State Route 522 Rail Overcrossing, view facing southwest from State Route 522 (Google Maps July 2023).

Historic Context

The following sections discuss the development of Snohomish County including the communities of Woodinville, the SLS&E Railroad, and historical resources identified in the APE.

Snohomish County

Established on January 14, 1861, Snohomish County is bordered by Skagit County to the north, King County to the south, and Chelan County to the east. The land comprising Snohomish County was previously part of Island County. Prior to the arrival of European explorers and migrants, the area was settled by the Snohomish people as well as other tribes including the Stillaguamish, Skykomish, Sauk-Suiattle, and Snoqualmie. Each tribe spoke Lushootseed, commonly in a northern dialect, and relied on plants and animals of the region for their livelihood. On January 22, 1855, Washington Territory Governor Isaac Stevens met with 81 tribal leaders to sign a treaty between the U.S. government and the region's Indigenous people. Representing the Snohomish, Snoqualmie, and Skykomish tribes, Snoqualmie Chief Patkanim agreed to trade their land for cash, hunting and fishing rights, and establishment of a reservation at Tulalip. Convenient water access and rich agricultural land attracted Euro-American migrants to Snohomish County beginning in the mid-nineteenth century. Like many areas of the Pacific Northwest, the arrival of the railroad in the late nineteenth century facilitated development of the county, including the timber and agricultural industries (Riddle 2006).

City of Snohomish

Originally settled by the Sdohobsh, a subdivision of the Snohomish, the area now known as the City of Snohomish is at the confluence of the Snohomish River and Pilchuck River. When Euro-Americans began migrating to the area, most Indigenous people had relocated to the Tulalip Reservation. Two of the earliest Euro-American migrants to the area were Heil Barnes and Edson Cady who intended to develop a community at the confluence of the Snohomish River and Pilchuck River. Cady filed a land claim and applied for a post office permit for "Cadyville." Barnes also filed a land claim on behalf of Emory C. Ferguson, who arrived in 1860 and established a mercantile. Cadyville became the county seat in July 1861 and was renamed Snohomish in 1871 (City of Snohomish n.d.). By the mid-nineteenth century, the community developed into the county's financial, cultural, and political center. By 1876, the community featured a school, library, science collection, newspaper, and an Athenaeum Society, a private members club for individuals with intellectual interests (Riddle 2006). The community initially was established to support the surrounding agricultural community and later developed into a logging town by the 1870s. By 1884, the population had reached 700, and the town featured a courthouse, six saloons, a school building, and a church. The Snohomish train station was completed a few years later in 1888. The SLS&E railroad arrived in 1889. When the city was incorporated in 1890, the population was 1,995 and quickly grew to 3,000 by 1895 (City of Snohomish n.d.). By 1910, the city featured a Carnegie Library, nine mills, and other plants; however, that year a large fire destroyed the largest mill as well as several other properties. After the fire, the local economy transitioned its focus to the rich agricultural land, which led to the development of a canning industry for the region's fruit products. The community continued to develop through the twentieth century with the establishment of the Bickford Ford car dealership in 1934 and the founding of the first historic district in Snohomish County in 1973 (RevisitWA.org n.d., City of Snohomish n.d.).

City of Woodinville

Before the arrival of Norwegian and Danish immigrants in the 1870s, the land now known as Woodinville was occupied by the Sammamish people, who developed a village of at least 100 people at the mouth of Bear Creek. The Sammamish grew root and bulb crops and conducted hunting and gathering practices along the Sammamish River. The first Euro-Americans to settle in this area were Susan and Ira Woodin who arrived in 1871. The couple were joined by Emmanuel Nelson and his daughter Mary in 1876. By the 1880s, Mary plotted many of Woodinville's lots and her husband Anders Hansen constructed houses for new settlers. Mary donated portions of her family's homestead for the development of railroads and a highway during the 1880s. Loggers and homesteads steadily moved into the Woodinville area during the late nineteenth and early twentieth century, facilitating its growth. The first church was constructed in 1880, followed by a one-room schoolhouse (1883) and a cemetery (1889). By 1909, Woodinville featured a two-room schoolhouse, two sawmills, two shingle mills, a brick and tile manufacturer, a school-desk factory, four hotels, a blacksmith, a stagecoach, multiple grocery stores, and a railway station. Although Woodinville began as a logging community, the clearing of timber led to the development of dairy and vegetable farms in the twentieth century. Woodinville began transitioning into a suburban community in the 1950s when Seattleites started purchasing property (Green 1999).

Seattle Lake Shore & Eastern

The SLS&E was incorporated on April 15, 1885, to establish a railway over Snoqualmie Pass between Seattle and Eastern Washington that could eventually be expanded throughout the region and to Canada (Armbruster 1999, 105). Judge Thomas Burke and aspirational entrepreneur Daniel Gilman galvanized Seattle businessmen and citizens to bring a railroad to Seattle with promises of eastern capital. The SLS&E board quickly raised sufficient funds to hire chief engineer Frederick H. Whitworth to conduct a preliminary survey of the railway, which began by January 28, 1887 (Armbruster 1999, 122; Robertson 1995, 266).

Burke and Gilman envisioned a railroad to connect the Seattle region with the natural resources east of Puget Sound. The area was rich in natural resources such as coal and gypsum near Squak Lake and coal, iron, and precious metals in Snoqualmie Pass. Timber and agricultural land were also plentiful on each side of the Cascade Range. Promoting the region's need to transport these resources and potential for lucrative economic opportunities, Gilman sought financial backing from Wall Street bankers and other investors in the east. Gilman's pitches to potential east coast investors eventually proved successful in 1886, allowing construction of the SLS&E to begin in 1887 (Armbruster 1999, 121-122).

The Puget Sound Construction Company was incorporated by the east coast investors to finance and build the railroad (Armbruster 1999, 124). Grading began on March 9, 1887, and the first rails were set on September 5, 1887 (Robertson 1995, 265). The initial 40 miles between Seattle and Snoqualmie Pass were to be constructed for \$200,000. Five- and 10-mile sections would be subcontracted out to local construction firms. By October, the railroad reached West Coast Junction (present day Woodinville). The initial train to travel the new line left Seattle for Squak on October 25, 1887.

To connect with Canadian Pacific Railway, a northern division of the SLS&E was planned. Beginning at West Coast Junction, the line would head northeast toward Snohomish and then eventually to the Canadian border via Sumas, Washington. The Seattle & West Coast Railway Co. initiated construction at present day Woodinville where the SLS&E met the Lake Shore Railroad (Armbruster 1999, 128). In June 1888, construction crews arrived in Snohomish to begin construction of the Snohomish River Railroad Bridge with the installation of bridge

footings in the Snohomish River. To avoid a legal injunction from a competing railroad, the Bellingham Bay Railway & Navigation Co., the bridge was reported to have been built expeditiously (Armbruster 1999, 131). The 1888 bridge was later replaced by Northern Pacific in 1912 with the extant through truss bridge. Research could not confirm why the 1888 bridge was replaced (Bridge Hunter 2023).

The 14.4-mile segment of the SLS&E between Woodinville and Snohomish was completed by July 1, 1888, when SLS&E began providing service for the 23-mile track between Snohomish and Seattle (Post Intelligencer 1888; King County Parks 2015, 7 and 9). At a cost of approximately \$14,425 per mile, 21 miles of track were completed between Woodinville and a point about 6 miles north of Snohomish by August 1888 (Armbruster 1999, 128-129). Charles Sheaf served as the chief engineer until early 1888 when he was replaced by Paul Mohr (Armbruster 1999, 129-130). By October 1888, passenger and freight trains were running to and from Snohomish, carrying coal, lumber, and merchandise (Armbruster 1999, 132).

The SLS&E's arrival in Woodinville and Snohomish contributed to the cities' growth and development, as the railroad provided more reliable means of transportation to Seattle's markets for the region's timber and agriculture businesses. The railroad also established a link to the coal mines in Issaquah. Development of the SLS&E coincided with the formation of several regional logging railroads, which created a greater network of railroad transportation (Taylor 2014). During the late nineteenth century, the SLS&E began solidifying itself as an important regional transportation network, linking major industries to Seattle, including Peter Kirk's steel mill on the east shore of Lake Washington (Armbruster 1999:130).

The SLS&E's development spurred the establishment of suburban townsites, logging camps, and shingle mills along its path, including Woodinville (Armbruster 1999, 124, 128, and 134). By 1890, the SLS&E extended north from Seattle, running along the northern portion of Lake Washington before turning east to Woodinville. From Woodinville the line split into two segments, one heading to the south and one to the north. The southern segment headed to Redmond and the eastern shore of Squak Lake (now Lake Sammamish) before turning east to Falls City and Sallal Prairie. The northern section passed through Snohomish on its way to Canada (Armbruster 1999, 117). On April 13, 1891, the SLS&E line reached the Canadian border via Sumas, Washington. The Canadian Pacific would reach Sumas within a month, establishing a long and productive international partnership (Armbruster 1999, 137).

Carrying freight and passengers, the SLS&E grew from 55 miles of track in July 1888 to 67 miles the following year and 156 miles the next year (Robertson 1995, 266-267). Despite its growth in the region, the SLS&E was evidently operating at a loss. As the SLS&E suffered financially, Northern Pacific sought to eliminate its competition by buying up SLS&E stock to gain greater control of its operations. As SLS&E's finances worsened, its shareholders began selling their holdings to the Northern Pacific. By July 1889, Northern Pacific acquired a majority interest in SLS&E and began leasing the line (Armbruster 1999, 135-138). On May 1, 1892, SLS&E's operations were consolidated with Northern Pacific's (King County Parks 2015, 11). At that time, SLS&E's holdings spanned 227 miles of track (Robertson 1995, 266-267).

The Great Panic of 1893 worsened the SLS&E's finances, and the company was placed in receivership (Armbruster 1999, 137-138). By June 1893, the company was bankrupt, and passenger and freight service drastically declined. On May 16, 1896, the SLS&E entered foreclosure processing and the company's holdings were split between two companies. The newly formed Seattle & International Railway Company acquired the tracks in western Washington, and the Spokane & Seattle Railway received the eastern Washington tracks (King County Parks 2015, 11). The Seattle & International Railway was backed by supporters of the Northern Pacific who sought to acquire the SLS&E's holdings in Western Washington. On April

1, 1901, the Seattle & International Railway became the Seattle division of the Northern Pacific (Armbruster 1999, 140). Within about 15 years of the acquisition and reorganization, Northern Pacific conducted improvements to the line in the project area, including construction of the extant Snohomish River Railroad Bridge. Base plates began to be replaced as early as the 1940s and continued to be replaced until as late as circa 1969.

Northern Pacific continued operating on the former SLS&E lines through the mid-twentieth century. Freight and passenger traffic began decreasing in the 1960s because of the developing interstate highway system (BNSF 2021, 4-5). In 1962, the State Route 522 rail overcrossing was constructed, allowing passage of the former SLS&E line over the newly constructed state highway (WSDOT 2021). In 1970, Northern Pacific; Chicago, Burlington, and Quincy; Great Northern; Spokane, Portland, and Seattle; and Pacific Coast railroads merged to form Burlington Northern Railroad. In 1995, Burlington Northern merged with the Atchison, Topeka, and Santa Fe Railway becoming BNSF (BNSF 2021, 4-5). By then, the SLR&E line north of Snohomish had been abandoned and acquired by Snohomish County all the way to the Skagit County border. This segment of the line is now known as the Centennial Trail.

In 2009, the Port of Seattle, in coordination with King County, purchased from BNSF the then-remaining 42 miles of line from City of Snohomish south to approximately Renton. The Port of Seattle sold the segment in King County to the City of Woodinville in 2015 and the segment in Snohomish County to Snohomish County in 2016. The line has not operated for rail purposes since at least August 1, 2020.

Conclusions and Recommendations

The SLS&E Snohomish Segment between mileposts 26.38 and 38.25 is eligible for NRHP under Criterion A for its significance at the local and state level in the areas of commerce, transportation, and community development as part of the larger SLS&E Company Railroad.

Although replacement of the rails, ties, and fasteners diminished the segment's integrity of materials, the use of in-kind materials retained the overall integrity of materials and workmanship. The line retains integrity of location, design, setting, materials, workmanship, feeling, and association; therefore, it conveys historic significance as a late nineteenth century railway and its relationship to the development of regional commerce. Snohomish County currently has no plan to remove track or ties.

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