



Everett Link Extension

ATTACHMENT D

Archaeological Survey Areas

This attachment is redacted in accordance with 54 USC § 307103, 36 CFR §800.11(c), and RCW 42.56.300. Contains privileged information that is not for public disclosure.



Everett Link Extension

ATTACHMENT E

Tribal and Agency Consultation Letters



June 20, 2024

Alexandria Byrd
City of Everett
Community Planning and Economic Development
2930 Wetmore Avenue, Suite 8A
Everett, WA 98201

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan (DAHP Tracking Number 2021-11-07529)

Dear Alexandria Byrd:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington. The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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**INTERIM
CHIEF EXECUTIVE OFFICER**
Goran Sparrman

Initiation of Consultation

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Sincerely,



Eric Widstrand, Director HCT Corridor Development

Enclosure:

Attachment 1 - Memorandum of Understanding on Cultural Resources Consultation and Cultural Resources Review

Attachment 2 – Area of Potential Effects Maps

Attachment 3 – Everett Link Extension Cultural Resources Survey and Inventory Plan (May 2024)

cc:

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 20, 2024

Fred Wong
Staff Liaison
City of Lynnwood & Heritage Board
19100 44th Ave W
Lynnwood, WA 98036

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan (DAHP Tracking Number 2021-11-07529)

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Goran Sparrman

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Sincerely,



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cc:

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 20, 2024

Lynnwood-Alderwood Manor Heritage Association
PO Box 2206
Lynnwood, WA 98036

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan (DAHP Tracking Number 2021-11-07529)

To whom it may concern at Lynnwood-Alderwood Manor Heritage Association:

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Goran Sparrman

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Central Puget Sound Regional Transit Authority • Union Station

401 S. Jackson St., Seattle, WA 98104-2826 • Reception: (206) 398-5000 • FAX: (206) 398-5499

www.soundtransit.org



June 20, 2024

Dr. Allyson Brooks
State Historic Preservation Officer
PO Box 48343
Olympia, WA 98504

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan (DAHP Tracking Number 2021-11-07529)

Dear Dr. Brooks :

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Goran Sparrman

Initiation of Consultation

Following procedures outlined in Attachment 1, Sound Transit is initiating consultation with your office as well as the following Federally Recognized Tribes:

Port Gamble S'Klallam Tribe	Stillaguamish Tribe of Indians of Washington
Muckleshoot Indian Tribe	Suquamish Indian Tribe of the Port Madison Reservation
Sauk-Suiattle Indian Tribe	Tulalip Tribes of Washington
Snoqualmie Indian Tribe	Confederated Tribes and Bands of the Yakama Nation
Swinomish Indian Tribal Community	Samish Indian Nation
	Upper Skagit Indian Tribe

The Lummi Tribe of the Lummi reservation has indicated they do not wish to continue with cultural resources review or consultation on this project.

Sound Transit is initiating coordination under its authority as lead agency for SEPA with the following non-Federally Recognized Tribes:

Duwamish Tribal Organization	Snohomish Tribe
------------------------------	-----------------

Sound Transit is initiating consultation with the following parties that are anticipated to be identified as consulting parties under Section 106 of the National Historic Preservation Act:

City of Everett	City of Lynnwood and Heritage Board
Snohomish County	Snohomish County Historical Commission
Lynnwood-Alderwood Manor Heritage Association	Washington Trust for Historic Preservation

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Sincerely,

A handwritten signature in black ink that reads "Eric Widstrand". The signature is fluid and cursive, with the first name "Eric" and last name "Widstrand" clearly legible.

Eric Widstrand, Director HCT Corridor Development

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cc:

Dennis Wardlaw, Transportation Archaeologist, Department of Archaeology and Historic Preservation

Maureen Elenga, Architectural Historian, Department of Archaeology and Historic Preservation

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 20, 2024

Gretchen Kaehler
Snohomish County Historical Commission
300 Rockefeller Ave, 6th Flr Conf Rm 6A02
Everett, WA 98201

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Snohomish County
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Per 40 CFR 1501.10, a National Environmental Policy Act (NEPA) EIS process must be completed within 2 years. To meet this requirement, Sound Transit is beginning the Draft EIS evaluation for the project under the State Environmental Policy Act (SEPA) at this time, and FTA is expected to later initiate the NEPA EIS process by issuing a Notice of Intent (NOI) in mid-2025. Sound Transit and FTA expect to then publish a combined SEPA/NEPA Draft EIS in late 2025. FTA will not initiate formal Section 106 consultation until they issue a NOI. Although they have not yet formally initiated a NEPA process, FTA is working with Sound Transit in an advisory capacity at this time in anticipation of a NEPA EIS process.

In March of 2024 Sound Transit and the Washington State Department of Archaeology and Historic Preservation (DAHP) executed a Memorandum of Understanding (Attachment 1) agreement establishing a process for cultural resources consultation and document review consistent with provisions outlined in 36 CFR Part 800. Consistent with the MOU Sound Transit is now officially initiating consultation with DAHP, Tribes, and parties that may be identified as consulting parties in the Section 106 consultation process. Additionally, Sound Transit, in Consultation with DAHP, Tribes, and potential Section 106 consulting parties has defined the area of potential effects (APE) for the project as described below, and requests your comments on the APE and the enclosed Cultural Resources Inventory and Survey Plan.

Attachments referenced below can be accessed via Sharepoint link included in email transmitting this letter.

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Goran Sparrman

Initiation of Consultation

Sound Transit anticipates that the Snohomish County will be identified as a consulting party with demonstrated interest in the Everett Link Extension Project when FTA initiates formal Section 106 consultation. As such, and following procedures outlined in Attachment 1, Sound Transit is initiating consultation with the Snohomish County. If you would like to continue to receive materials related to consultation please respond within 30 days of receipt of this invitation.

Area of Potential Effects

The APE is within Sections 20, 29, and 32 of Township 29N Range 5E; Sections 5, 7, 8, 17, and 18 of Township 28N Range 5E; Sections 11, 12, 13, 14, 15, 23, 25, 26, and 36 of Township 28N Range 4E; and Sections 1, 2, 11, 14, 15, and 22 of Township 27N Range 4E.

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Cultural Resources Analysis and Methods

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Sound Transit appreciates your participation and input in this process. We look forward to your comments on the Project, the APE, and the enclosed cultural resources inventory and survey plan. If you have any questions or comments please feel free to contact Sound Transit Cultural Resources Manager Alex Stevenson at Alex.stevenson@soundtransit.org.

Sincerely,



Eric Widstrand, Director HCT Corridor Development

Enclosure:

Attachment 1 - Memorandum of Understanding on Cultural Resources Consultation and Cultural Resources Review

Attachment 2 – Area of Potential Effects Maps

Attachment 3 – Everett Link Extension Cultural Resources Survey and Inventory Plan (May 2024)

cc:

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 20, 2024

Chris Moore
Washington Trust for Historic Preservation
1204 Minor Ave.
Seattle, WA 98101

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan (DAHP Tracking Number 2021-11-07529)

Dear Chris Moore:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington. The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

Per 40 CFR 1501.10, a National Environmental Policy Act (NEPA) EIS process must be completed within 2 years. To meet this requirement, Sound Transit is beginning the Draft EIS evaluation for the project under the State Environmental Policy Act (SEPA) at this time, and FTA is expected to later initiate the NEPA EIS process by issuing a Notice of Intent (NOI) in mid-2025. Sound Transit and FTA expect to then publish a combined SEPA/NEPA Draft EIS in late 2025. FTA will not initiate formal Section 106 consultation until they issue a NOI. Although they have not yet formally initiated a NEPA process, FTA is working with Sound Transit in an advisory capacity at this time in anticipation of a NEPA EIS process.

In March of 2024 Sound Transit and the Washington State Department of Archaeology and Historic Preservation (DAHP) executed a Memorandum of Understanding (Attachment 1) agreement establishing a process for cultural resources consultation and document review consistent with provisions outlined in 36 CFR Part 800. Consistent with the MOU Sound Transit is now officially initiating consultation with DAHP, Tribes, and parties that may be identified as consulting parties in the Section 106 consultation process. Additionally, Sound Transit, in Consultation with DAHP, Tribes, and potential Section 106 consulting parties has defined the area of potential effects (APE) for the project as described below, and requests your comments on the APE and the enclosed Cultural Resources Inventory and Survey Plan.

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Initiation of Consultation

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Goran Sparrman

Sound Transit anticipates that the Washington Trust for Historic Preservation will be identified as a consulting party with demonstrated interest in the Everett Link Extension Project when FTA initiates formal Section 106 consultation. As such, and following procedures outlined in Attachment 1, Sound Transit is initiating consultation with the Washington Trust for Historic Preservation. If you would like to continue to receive materials related to consultation please respond within 30 days of receipt of this invitation.

Area of Potential Effects

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Sound Transit appreciates your participation and input in this process. We look forward to your comments on the Project, the APE, and the enclosed cultural resources inventory and survey plan. If you have any questions or comments please feel free to contact Sound Transit Cultural Resources Manager Alex Stevenson at Alex.stevenson@soundtransit.org.

Sincerely,



Eric Widstrand, Director HCT Corridor Development

Enclosure:

Attachment 1 - Memorandum of Understanding on Cultural Resources Consultation and Cultural Resources Review

Attachment 2 – Area of Potential Effects Maps

Attachment 3 – Everett Link Extension Cultural Resources Survey and Inventory Plan (May 2024)

cc:

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 25, 2024

Chairman Gerald Lewis
Confederated Tribes and Bands of the Yakama Nation
401 Fort Road
Toppenish, WA 98948

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan

Dear Chairman Gerald Lewis:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington. The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

Per 40 CFR 1501.10, a National Environmental Policy Act (NEPA) EIS process must be completed within 2 years. To meet this requirement, Sound Transit is beginning the Draft EIS evaluation for the project under the State Environmental Policy Act (SEPA) at this time, and FTA is expected to later initiate the NEPA EIS process by issuing a Notice of Intent (NOI) in mid-2025. Sound Transit and FTA expect to then publish a combined SEPA/NEPA Draft EIS in late 2025. FTA will not initiate formal Section 106 consultation until they issue a NOI. Although they have not yet formally initiated a NEPA process, FTA is working with Sound Transit in an advisory capacity at this time in anticipation of a NEPA EIS process.

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Initiation of Consultation

Sound Transit anticipates that the Yakama Nation will be a Tribe that FTA initiates formal Section 106 consultation with when it begins that process. As such, and following procedures outlined in Attachment 1, Sound Transit is initiating consultation with the Yakama Nation on this project.

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Area of Potential Effects

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Cultural Resources Analysis and Methods

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Sound Transit appreciates your participation and input in this process. We look forward to your comments on the Project and the APE. If you have any questions or comments please feel free to contact Sound Transit Cultural Resources Manager Alex Stevenson at Alex.stevenson@soundtransit.org.

Sincerely,



Dezerae Hayes, Director of Tribal Relations

Enclosure:

Attachment 1 - Memorandum of Understanding on Cultural Resources Consultation and Cultural Resources Review

Attachment 2 – Area of Potential Effects Maps

Attachment 3 – Everett Link Extension Cultural Resources Survey and Inventory Plan (May 2024)

cc:

Rose Ferri, Tribal Historic Preservation Officer, Confederated Tribes and Bands of the Yakama Nation

Casey Barney, Cultural Resources, Confederated Tribes and Bands of the Yakama Nation

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 25, 2024

Chairwoman Cecile Hansen
Duwamish Tribal Organization
4705 W Marginal Way SW
Seattle, WA 98106

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan

Dear Chair Hansen:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington. The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Initiation of Coordination

Sound Transit anticipates continued coordination with the Duwamish Tribe throughout the environmental review phase of the project. As such, and following procedures outlined in Attachment 1, Sound Transit is initiating consultation with the Duwamish Tribe on this project.

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Goran Sparrman

Area of Potential Effects

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Sound Transit appreciates your participation and input in this process. We look forward to your comments on the Project and the APE. If you have any questions or comments please feel free to contact Sound Transit Cultural Resources Manager Alex Stevenson at Alex.stevenson@soundtransit.org.

Sincerely,



Dezerae Hayes, Director of Tribal Relations

Enclosure:

Attachment 1 - Memorandum of Understanding on Cultural Resources Consultation and Cultural Resources Review

Attachment 2 – Area of Potential Effects Maps

Attachment 3 – Everett Link Extension Cultural Resources Survey and Inventory Plan (May 2024)

cc:

Nancy Sackman, Cultural Preservation Officer, Duwamish Tribal Organization

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 25, 2024

Chairman Jaison Elkins
Muckleshoot Indian Tribe
39015 172nd Ave SE
Auburn, WA 98092

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan

Dear Chair Elkins:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington. The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Initiation of Consultation

Sound Transit anticipates that the Muckleshoot Tribe will be a Tribe that FTA initiates formal Section 106 consultation with when it begins that process. As such, and following procedures

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Goran Sparrman

outlined in Attachment 1, Sound Transit is initiating consultation with the Muckleshoot Tribe on this project.

Area of Potential Effects

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Sound Transit appreciates your participation and input in this process. We look forward to your comments on the Project and the APE. If you have any questions or comments please feel free to contact Sound Transit Cultural Resources Manager Alex Stevenson at Alex.stevenson@soundtransit.org.

Sincerely,



Dezerae Hayes, Director of Tribal Relations

Enclosure:

Attachment 1 - Memorandum of Understanding on Cultural Resources Consultation and Cultural Resources Review

Attachment 2 – Area of Potential Effects Maps

Attachment 3 – Everett Link Extension Cultural Resources Survey and Inventory Plan (May 2024)

cc:

Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 25, 2024

Chairman Jeromy Sullivan
Port Gamble S'Klallam Tribe
31912 Little Boston Rd NE
Kingston, WA 98346-0155

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan

Dear Chair Sullivan:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington. The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Initiation of Consultation

Sound Transit anticipates that the Port Gamble S'Klallam Tribe will be a Tribe that FTA initiates formal Section 106 consultation with when it begins that process. As such, and following

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Dow Constantine
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King County Council Vice Chair

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procedures outlined in Attachment 1, Sound Transit is initiating consultation with the Port Gamble S'Klallam Tribe on this project.

Area of Potential Effects

The APE is within Sections 20, 29, and 32 of Township 29N Range 5E; Sections 5, 7, 8, 17, and 18 of Township 28N Range 5E; Sections 11, 12, 13, 14, 15, 23, 25, 26, and 36 of Township 28N Range 4E; and Sections 1, 2, 11, 14, 15, and 22 of Township 27N Range 4E.

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Sincerely,

A handwritten signature in black ink, appearing to read "D. Hayes", with a stylized, looping flourish at the end.

Dezerae Hayes, Director of Tribal Relations

Enclosure:

Attachment 1 - Memorandum of Understanding on Cultural Resources Consultation and Cultural Resources Review

Attachment 2 – Area of Potential Effects Maps

Attachment 3 – Everett Link Extension Cultural Resources Survey and Inventory Plan (May 2024)

cc:

Misty Ives, Tribal Historic Preservation Officer, Port Gamble S'Klallam Tribe

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 25, 2024

Chairman Nino Maltos
Sauk-Suiattle Indian Tribe
5318 Chief Brown Lane
Darrington, WA 98241-9421

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan

Dear Chair Maltos:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington. The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Initiation of Consultation

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Dezerae Hayes, Director of Tribal Relations

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cc:

Kevin Joseph Cultural Resources, Sauk-Suiattle Indian Tribe

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 25, 2024

Chairman Mike Evans
Snohomish Tribe of Indians
9792 Edmonds Way, Box 267
Edmonds, WA 98020

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan

Dear Chair Evans:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington. The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Initiation of Coordination

Sound Transit anticipates continued coordination with the Snohomish Tribe throughout the environmental review phase of the project. As such, and following procedures outlined in Attachment 1, Sound Transit is initiating consultation with the Snohomish Tribe on this project.

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Goran Sparrman

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Dezerae Hayes, Director of Tribal Relations

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Attachment 3 – Everett Link Extension Cultural Resources Survey and Inventory Plan (May 2024)

cc:

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 25, 2024

Chairman Robert de los Angeles
Snoqualmie Indian Tribe
9571 Ethan Wade Way SE
Snoqualmie, WA 98065

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan

Dear Chair de los Angeles:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington. The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Goran Sparrman

Area of Potential Effects

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Dezerae Hayes, Director of Tribal Relations

Enclosure:

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Attachment 2 – Area of Potential Effects Maps

Attachment 3 – Everett Link Extension Cultural Resources Survey and Inventory Plan (May 2024)

cc:

Steven Mullen-Moses, Director, Archaeology and Historic Preservation, Snoqualmie Indian Tribe

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 25, 2024

Chairman Eric White
Stillaguamish Tribe of Indians of Washington
3322 236th St NE
Arlington, WA 98223

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan

Dear Chair White:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington. The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Goran Sparrman

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cc:

Sam Barr, Cultural Resources, Stillaguamish Tribe of Indians of Washington

Kerry Lyste, Cultural Resources, Stillaguamish Tribe of Indians of Washington

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 25, 2024

Chairman Leonard Forsman
Suquamish Indian Tribe
18490 Suquamish Way
Suquamish, WA 98392

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan

Dear Chair Forsman:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington. The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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cc:

Stephanie Trudel, Cultural Resources, Suquamish Indian Tribe

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 25, 2024

Chairman Steve Edwards
Swinomish Indian Tribal Community
11404 Morrage Way
LaConner, WA 98257-9450

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan

Dear Chair Edwards:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington. The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

Per 40 CFR 1501.10, a National Environmental Policy Act (NEPA) EIS process must be completed within 2 years. To meet this requirement, Sound Transit is beginning the Draft EIS evaluation for the project under the State Environmental Policy Act (SEPA) at this time, and FTA is expected to later initiate the NEPA EIS process by issuing a Notice of Intent (NOI) in mid-2025. Sound Transit and FTA expect to then publish a combined SEPA/NEPA Draft EIS in late 2025. FTA will not initiate formal Section 106 consultation until they issue a NOI. Although they have not yet formally initiated a NEPA process, FTA is working with Sound Transit in an advisory capacity at this time in anticipation of a NEPA EIS process.

In March of 2024 Sound Transit and the Washington State Department of Archaeology and Historic Preservation (DAHP) executed a Memorandum of Understanding (Attachment 1) agreement establishing a process for cultural resources consultation and document review consistent with provisions outlined in 36 CFR Part 800. Consistent with the MOU Sound Transit is now officially initiating consultation with DAHP, Tribes, and parties that may be identified as consulting parties in the Section 106 consultation process. Additionally, Sound Transit has defined the area of potential effects (APE) for the project as described below, and requests your comments on the APE and the enclosed Cultural Resources Inventory and Survey Plan.

Attachments referenced below can be accessed via Sharepoint link included in email transmitting this letter.

Initiation of Consultation

Sound Transit anticipates that the Swinomish Tribe will be a Tribe that FTA initiates formal Section 106 consultation with when it begins that process. As such, and following procedures outlined in Attachment 1, Sound Transit is initiating consultation with the Swinomish Tribe on this project.

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Goran Sparrman

Area of Potential Effects

The APE is within Sections 20, 29, and 32 of Township 29N Range 5E; Sections 5, 7, 8, 17, and 18 of Township 28N Range 5E; Sections 11, 12, 13, 14, 15, 23, 25, 26, and 36 of Township 28N Range 4E; and Sections 1, 2, 11, 14, 15, and 22 of Township 27N Range 4E.

The APE for the project (Attachment 2) generally extends from elements of the project limits (e.g., guideway, stations, OMF, and construction staging areas) to the nearest tax parcel, or a maximum of 200 feet where large tax parcels are adjacent to project elements. Where the project limits enter shared interest parcels, the APE extends 200 feet into the shared interest parcel boundary.

The anticipated depths of disturbance of the project are variable throughout the APE. Deep ground disturbance is anticipated for construction of road undercrossings and drilled shafts or columns used to support the elevated guideway where ground disturbance may exceed 150 feet below surface. Shallower ground disturbance is also anticipated for access road construction, staging area use, utility work, and stormwater facilities, generally 5 to 20 feet below surface. The APE vertical-limit depth for precontact and historical archaeological resources consists of the area that will be disturbed in constructing the project up to the depth of sterile soils based on soil types, geologic setting, age of landforms, and modern disturbance.

Cultural Resources Analysis and Methods

Sound Transit's consultants Equinox Cultural Resources Incorporated and Cascade Heritage Consultants have developed a cultural resources inventory and survey plan (Attachment 3). This survey plan includes a background literature review and proposed methods for both archaeological and built environment survey within the APE as described above. The cultural resources survey and inventory plan is enclosed for your review and comment.

Sound Transit appreciates your participation and input in this process. We look forward to your comments on the Project and the APE. If you have any questions or comments please feel free to contact Sound Transit Cultural Resources Manager Alex Stevenson at Alex.stevenson@soundtransit.org.

Sincerely,



Dezerae Hayes, Director of Tribal Relations

Enclosure:

Attachment 1 - Memorandum of Understanding on Cultural Resources Consultation and Cultural Resources Review

Attachment 2 – Area of Potential Effects Maps

Attachment 3 – Everett Link Extension Cultural Resources Survey and Inventory Plan (May 2024)

cc:

Josephine Jefferson, Tribal Historic Preservation Officer, Swinomish Indian Tribal Community

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 25, 2024

Chairwoman Teri Gobin
Tulalip Tribes
6406 Marine Drive
Tulalip, WA 98271

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan

Dear Chair Gobin:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington. The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Sound Transit anticipates that the Tulalip Tribes will be a Tribe that FTA initiates formal Section 106 consultation with when it begins that process. As such, and following procedures outlined in Attachment 1, Sound Transit is initiating consultation with the Tulalip Tribes on this project.

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Sound Transit appreciates your participation and input in this process. We look forward to your comments on the Project and the APE. If you have any questions or comments please feel free to contact Sound Transit Cultural Resources Manager Alex Stevenson at Alex.stevenson@soundtransit.org.

Sincerely,



Dezerae Hayes, Director of Tribal Relations

Enclosure:

Attachment 1 - Memorandum of Understanding on Cultural Resources Consultation and Cultural Resources Review

Attachment 2 – Area of Potential Effects Maps

Attachment 3 – Everett Link Extension Cultural Resources Survey and Inventory Plan (May 2024)

cc:

Richard Young, Cultural Resources, Tulalip Tribes

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit



June 25, 2024

Chairwoman Marilyn Scott
Upper Skagit Indian Tribe
25944 Community Plaza Way
Sedro Woolley, WA 98284-9739

Subject: Sound Transit Everett Link Extension Initiation of Consultation, Area of Potential Effect Definition, and Cultural Resources Inventory and Survey Plan

Dear Chair Scott:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington. The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Goran Sparrman

outlined in Attachment 1, Sound Transit is initiating consultation with the Upper Skagit Tribe on this project.

Area of Potential Effects

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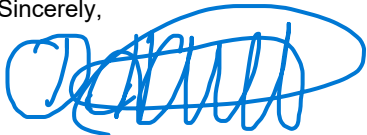
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Sincerely,



Dezerae Hayes, Director of Tribal Relations

Enclosure:

Attachment 1 - Memorandum of Understanding on Cultural Resources Consultation and Cultural Resources Review

Attachment 2 – Area of Potential Effects Maps

Attachment 3 – Everett Link Extension Cultural Resources Survey and Inventory Plan (May 2024)

cc:

Scott Schuyler, Cultural, Natural Resources and Emergency Management, Upper Skagit Indian Tribe

Jennifer Schreck, Sr. Cultural Resources Specialist, Sound Transit

Hussein Rehmat, Sr. Environmental Planner, Sound Transit

From: Preservation Department <preservationdept@duwamishtribe.org>
Sent: Monday, July 8, 2024 2:13 PM
To: Stevenson, Alex <alex.stevenson@soundtransit.org>
Subject: EVLE and Lake Forest Park

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Hi Alex,

Hope you are doing well and staying cool during these 90+ degree days!

We are looking at the email you sent this morning regarding EVLE and Equinox' Survey and Inventory Plan. I would like to check the segment alignment APEs with our cultural maps and potentially respond if we have any concerns.

Also, I am hoping to discuss with you Sound Transit improvements through Lake Forest Park along 522. The Tribe does have some concerns near Bsche'tla (bəscə'łəʔ) Creek and into the area near the Town Center.

Thank you, Nancy.

Nancy Sackman
Cultural Preservation Officer
206-856-2564 Mobile
206-431-1582 ext 104 Longhouse



From: Stephanie Trudel <strudel@Suquamish.nsn.us>
Sent: Wednesday, July 24, 2024 4:21 PM
To: Stevenson, Alex <alex.stevenson@soundtransit.org>
Subject: RE: Sound Transit's Everett Link Extension Cultural Resources Consultation Initiation and APE Definition

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Dear Alex,

Thank you for your email and letter initiating consultation with the Suquamish Indian Tribe for the Sound Transit Everett Link Extension Project in Snohomish County. The Suquamish Tribe's Archaeology and Historic Preservation Program has reviewed the information provided in the attachments and concurs with Sound Transit's definition of the Area of Potential Effects. At this time, we have no comments or concerns regarding the Cultural Resources Inventory and Survey Plan.

Sincerely,
Stephanie

Stephanie Trudel
Tribal Historic Preservation Officer
Suquamish Tribe
PO Box 498
Suquamish, WA 98392-0498
360-394-8533
strudel@suquamish.nsn.us

From: Stevenson, Alex <alex.stevenson@soundtransit.org>
Sent: Monday, July 8, 2024 9:35 AM
To: Leonard Forsman <lforsman@suquamish.nsn.us>
Cc: Stephanie Trudel <strudel@Suquamish.nsn.us>; Hayes, Dezerae <Dezerae.Hayes@soundtransit.org>; Rehmat, Hussein <hussein.rehmat@soundtransit.org>; Schreck, Jennifer <jennifer.schreck@soundtransit.org>; Wardlaw, Dennis (DAHP) <Dennis.Wardlaw@dahp.wa.gov>
Subject: Sound Transit's Everett Link Extension Cultural Resources Consultation Initiation and APE Definition

Dear Chair Forsman -

Please see attached Cultural Resources Consulta on Initiation and APE Definion Letter for the Sound Transit Everett Link Extension Project. I am sending this on behalf of Sound Transit's Tribal Relations Director Dezerae Hayes.

The letter references three attachments which can be accessed at the Sharepoint Link here. To sign in please use your organizations sign-in credetials for your internal network.

Please let me know if you have any issues accessing or downloading these files. Thank you for your review.

Sincerely,

Alex E. Stevenson
Manager - Cultural Resources
Sound Transit
Mobile: 206-419-5315

Pronouns: He/Him/His

Connect with us





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

July 24, 2024

Alexander Stevenson
Archaeologist
Sound Transit

In future correspondence please refer to:
Project Tracking Code: 2021-11-07529
Property: Snohomish County_ Everett Link Extension Project
Re: Archaeology - APE Concur

Dear Alexander Stevenson:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced project. In response, we have reviewed your description and map of the area of potential effect (APE).

We concur with your definition of the APE and proposed survey methodology. Along with the results of the inventory we will need to review your consultation with the concerned tribes, and other interested/affected parties. Please provide any correspondence or comments from concerned tribes and/or other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Should additional information about the project become available, our assessment may be revised.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,

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





February 10, 2025

Gerald Lewis
Chairman
Confederated Tribes and Bands of the Yakama Nation
401 Fort Road
Toppenish, WA 98948

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Chair Lewis:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In June of 2024 Sound Transit transmitted correspondence to the Confederated Tribes and Bands of the Yakama Nation defining the project Area of Potential Effects (APE) and transmitting a cultural resources inventory and survey plan for your review and comment. Sound Transit has continued design on the Project and identified additional project needs requiring a revision of the APE and updated the Cultural Resources Inventory and Survey Plan (Plan) accordingly. This letter requests your comment on the revised APE and on the updated Survey and Inventory plan.

The enclosed APE map set (Attachment 1) shows both the existing APE and the proposed APE revision. As mentioned above, the APE boundary has been revised to address updates to stations and other Project elements.

The enclosed Plan (Attachment 2) has been updated to accommodate the revised APE. No other changes were made to the Plan.

Sound Transit appreciates your time reviewing the enclosed materials and looks forward to your comments. Sound Transit requests that you provide comments within 30 days of receipt of this letter. If you have any questions please reach out to me via email at Dezerae.hayes@soundtransit.org.

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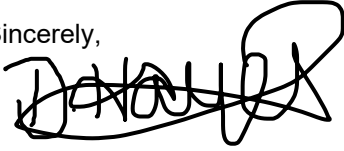
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Girmay Zahilay
King County Council Chair

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Goran Sparrman

Sincerely,

A handwritten signature in black ink, appearing to read "Dezeræ Hayes", with a large, stylized flourish at the end.

Dezeræ Hayes
Director of Tribal Relations

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Rose Ferri, THPO, Confederated Tribes and Bands of the Yakama Nation

Casey Barney, Cultural Resources, Confederated Tribes and Bands of the Yakama Nation

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 11, 2025

Jonathan Smith
Chairman
Confederated Tribes of the Warm Springs Reservation of Oregon
1233 Veterans Street
Warm Springs, OR 97761

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Chair Smith

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

Sound Transit is transmitting correspondence to the Confederated Tribes of the Warm Springs Reservation of Oregon defining the project Area of Potential Effects (APE) and transmitting a cultural resources inventory and survey plan for your review and comment. The APE was originally defined in June of 2024, recently Sound Transit has been made aware of the Confederated Tribes of the Warm Springs Reservation of Oregon interest in this area. Sound Transit has continued design on the Project and identified additional project needs requiring a revision of the APE and updated the Cultural Resources Inventory and Survey Plan (Plan) accordingly.

Sound Transit anticipates that the Federal Transit Administration (FTA) will conduct consultation under Section 106 of the National Historic Preservation Act sometime in 2025. Sound Transit anticipates that FTA will include the Confederated Tribes of the Warm Springs Reservation of Oregon in Section 106 consultation.

This letter requests your comment on the revised APE and on the updated Survey and Inventory plan.

The enclosed APE map set (Attachment 1) shows both the existing APE and the proposed APE revision. As mentioned above, the APE boundary has been revised to address updates to stations and other Project elements.

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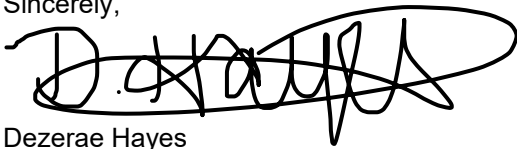
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Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

February 11, 2025

Page 2

Sincerely,

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Dezerae Hayes
Director of Tribal Relations

Enclosure:

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cc:

Robert Brunoe, THPO, Confederated Tribes of the Warm Springs Reservation of Oregon

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 11, 2025

Cecile Hansen
Chairwoman
Duwamish Tribal Organization
4705 W Marginal Way SW
Seattle, WA 98106

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Chair Hansen:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In June of 2024 Sound Transit transmitted correspondence to the Duwamish Tribal Organization defining the project Area of Potential Effects (APE) and transmitting a cultural resources inventory and survey plan for your review and comment. Sound Transit has continued design on the Project and identified additional project needs requiring a revision of the APE and updated the Cultural Resources Inventory and Survey Plan (Plan) accordingly. This letter requests your comment on the revised APE and on the updated Survey and Inventory plan.

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Sound Transit appreciates your time reviewing the enclosed materials and looks forward to your comments. Sound Transit requests that you provide comments within 30 days of receipt of this letter. If you have any questions please reach out to me via email at Dezerae.hayes@soundtransit.org.

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Snohomish County Executive

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**INTERIM
CHIEF EXECUTIVE OFFICER**
Goran Sparrman

Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory
and Survey Plan

February 11, 2025

Page 2

Sincerely,

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

Dezeræ Hayes
Director of Tribal Relations

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Nancy Sackman, Cultural Preservation Officer, Duwamish Tribal Organization

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 11, 2025

Jason Elkins
Chairman
Muckleshoot Indian Tribe
39015 172nd Ave SE
Auburn, WA 98092

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Chair Elkins

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In June of 2024 Sound Transit transmitted correspondence to the Muckleshoot Indian Tribe defining the project Area of Potential Effects (APE) and transmitting a cultural resources inventory and survey plan for your review and comment. Sound Transit has continued design on the Project and identified additional project needs requiring a revision of the APE and updated the Cultural Resources Inventory and Survey Plan (Plan) accordingly. This letter requests your comment on the revised APE and on the updated Survey and Inventory plan.

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Snohomish County Executive

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Seattle Councilmember

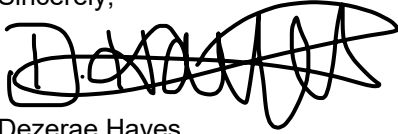
Peter von Reichbauer
King County Councilmember

Kristina Walker
Tacoma Councilmember

Girmay Zahilay
King County Council Chair

**INTERIM
CHIEF EXECUTIVE OFFICER**
Goran Sparrman

Sincerely,

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

Dezeræ Hayes
Director of Tribal Relations

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Laura Murphy, Archaeologist, Muckleshoot Indian Tribe

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 11, 2025

Amber Caldera
Chairwoman
Port Gamble S'Klallam Tribe
31912 Little Boston Rd NE
Kingston, WA 98346-0155

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Chair Caldera:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In June of 2024 Sound Transit transmitted correspondence to the Port Gamble S'Klallam Tribe defining the project Area of Potential Effects (APE) and transmitting a cultural resources inventory and survey plan for your review and comment. Sound Transit has continued design on the Project and identified additional project needs requiring a revision of the APE and updated the Cultural Resources Inventory and Survey Plan (Plan) accordingly. This letter requests your comment on the revised APE and on the updated Survey and Inventory plan.

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Snohomish County Executive

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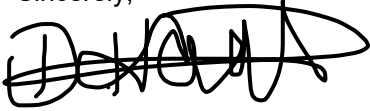
Kristina Walker
Tacoma Councilmember

Girmay Zahilay
King County Council Chair

**INTERIM
CHIEF EXECUTIVE OFFICER**
Goran Sparrman

Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory
and Survey Plan
February 11, 2025
Page 2

Sincerely,

A handwritten signature in black ink, appearing to read 'Dezeræ Hayes', with a large, stylized flourish at the end.

Dezeræ Hayes
Director of Tribal Relations

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Laura Price, Cultural Resources, Port Gamble S'Klallam Tribe

Misty Ives, Cultural Resources, Port Gamble S'Klallam Tribe

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 10, 2025

Nino Maltos
Chairman
Suak - Suittale Indian Tribe
5318 Chief Brown Lane
Darrington, WA 98241-9421

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Chair Maltos

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In June of 2024 Sound Transit transmitted correspondence to the Suak – Suittale Indian Tribe defining the project Area of Potential Effects (APE) and transmitting a cultural resources inventory and survey plan for your review and comment. Sound Transit has continued design on the Project and identified additional project needs requiring a revision of the APE and updated the Cultural Resources Inventory and Survey Plan (Plan) accordingly. This letter requests your comment on the revised APE and on the updated Survey and Inventory plan.

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Snohomish County Executive

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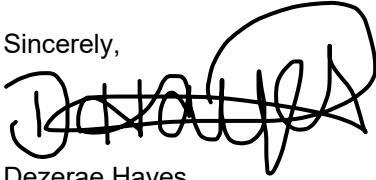
Peter von Reichbauer
King County Councilmember

Kristina Walker
Tacoma Councilmember

Girmay Zahilay
King County Council Chair

**INTERIM
CHIEF EXECUTIVE OFFICER**
Goran Sparrman

Sincerely,

A handwritten signature in black ink, appearing to read 'Dezeræ Hayes', with a large, loopy flourish at the end.

Dezeræ Hayes
Director of Tribal Relations

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Kevin Joseph, Cultural Resources, Suak - Suiattle Indian Tribe

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 11, 2025

Mike Evans
Chairman
Snohomish Tribe of Indian
9792 Edmonds Way, Box 267
Edmonds, WA 98020

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Chair Evans:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In June of 2024 Sound Transit transmitted correspondence to the Snohomish Tribe of Indians defining the project Area of Potential Effects (APE) and transmitting a cultural resources inventory and survey plan for your review and comment. Sound Transit has continued design on the Project and identified additional project needs requiring a revision of the APE and updated the Cultural Resources Inventory and Survey Plan (Plan) accordingly. This letter requests your comment on the revised APE and on the updated Survey and Inventory plan.

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King County Council Chair

**INTERIM
CHIEF EXECUTIVE OFFICER**
Goran Sparrman

Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory
and Survey Plan

February 11, 2025

Page 2

Sincerely,

A handwritten signature in black ink, appearing to read 'Dezeræ Hayes', with a large, sweeping loop at the end.

Dezeræ Hayes
Director of Tribal Relations

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Pamala SeaMonster, Snohomish Tribe Vice Chair

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 11, 2025

Robert de los Angeles
Chairman
Snoqualmie Indian Tribe
9571 Ethan Wade Way SE
Snoqualmie, WA 98065

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Chair de los Angeles

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In June of 2024 Sound Transit transmitted correspondence to the Snoqualmie Indian Tribe defining the project Area of Potential Effects (APE) and transmitting a cultural resources inventory and survey plan for your review and comment. Sound Transit has continued design on the Project and identified additional project needs requiring a revision of the APE and updated the Cultural Resources Inventory and Survey Plan (Plan) accordingly. This letter requests your comment on the revised APE and on the updated Survey and Inventory plan.

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Snohomish County Executive

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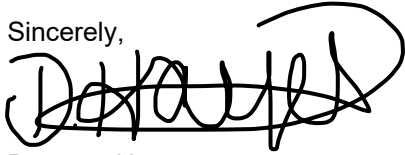
Peter von Reichbauer
King County Councilmember

Kristina Walker
Tacoma Councilmember

Girmay Zahilay
King County Council Chair

**INTERIM
CHIEF EXECUTIVE OFFICER**
Goran Sparrman

Sincerely,

A handwritten signature in black ink, appearing to read 'Dezeræ Hayes', written over a horizontal line.

Dezeræ Hayes
Director of Tribal Relations

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Steven Moses, Director, Archaeology and Historic Preservation, Snoqualmie Indian Tribe

Adam Osbekoff, Snoqualmie Indian Tribe

Aaron Webster, Snoqualmie Indian Tribe

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 11, 2025

Eric White
Chairman
Stillaquamish Tribe of Indians of Washington
3322 236th St NE
Arlington, WA 98223

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Chair White

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Snohomish County Executive

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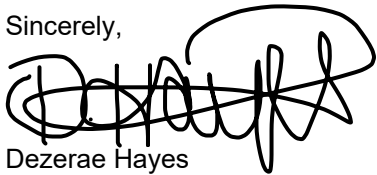
Kristina Walker
Tacoma Councilmember

Girmay Zahilay
King County Council Chair

**INTERIM
CHIEF EXECUTIVE OFFICER**
Goran Sparrman

Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory
and Survey Plan
February 11, 2025
Page 2

Sincerely,

A handwritten signature in black ink, appearing to read "Dezeræ Hayes", with a large, stylized flourish at the end.

Dezeræ Hayes
Director of Tribal Relations

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Sam Barr, THPO Supervisor, Stillaguamish Tribe of Indians

Shawn Yannity, Cultural Resources, Stillaguamish Tribe of Indians

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 11, 2025

Leonard Forsman
Chairman
Suquamish Indian Tribe of the Port Madison Reservation
18490 Suquamish Way
Suquamish, WA 98392

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Chair Forsman

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Snohomish County Executive

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King County Councilmember

Kristina Walker
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Girmay Zahilay
King County Council Chair

**INTERIM
CHIEF EXECUTIVE OFFICER**
Goran Sparrman

Sincerely,

A handwritten signature in black ink, appearing to read "Dezeræ Hayes", with a stylized, looped flourish at the end.

Dezeræ Hayes
Director of Tribal Relations

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Stephanie Trudel, THPO, Suquamish Indian Tribe

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 10, 2025

Steve Edwards
Chairman
Swinomish Indian Tribal Community
11404 Morrige Way
LaConnor, WA 98257-9450

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Chair Edwards

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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CHAIR

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Snohomish County Executive

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*Washington State Secretary
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King County Council Chair

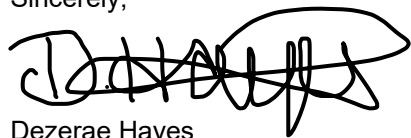
**INTERIM
CHIEF EXECUTIVE OFFICER**
Goran Sparrman

Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory
and Survey Plan

February 11, 2025

Page 2

Sincerely,

A handwritten signature in black ink, appearing to read 'Dezeræ Hayes', with a large, sweeping loop at the end.

Dezeræ Hayes
Director of Tribal Relations

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Josephine Jefferson, Cultural Resources, Swinomish Indian Tribal Community

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 10, 2025

Teri Gobin
Chairwoman
Tulalip Tribes
11404 Morrige Way
LaConnor, WA 98257-9450

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Chair Gobin

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Sound Transit appreciates your time reviewing the enclosed materials and looks forward to your comments. Sound Transit requests that you provide comments within 30 days of receipt of this letter. If you have any questions please reach out to me via email at Dezerae.hayes@soundtransit.org.

Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

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CHIEF EXECUTIVE OFFICER**
Goran Sparrman

February 11, 2025

Page 2

Sincerely,

A handwritten signature in black ink, appearing to read "Dezeray Hayes", with a stylized, cursive script.

Dezeray Hayes

Director of Tribal Relations

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Richard Young, Cultural Resources, Tulalip Tribes

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 10, 2025

Jennifer Washington
Chairwoman
Upper Skagit Indian Tribe
25944 Community Plaza Way
Sedro Woolley, WA 98284-9739

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Chair Washington:

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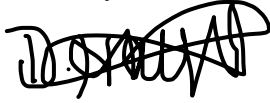
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King County Councilmember

Kristina Walker
Tacoma Councilmember

Girmay Zahilay
King County Council Chair

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Goran Sparrman

Sincerely,

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Dezeræ Hayes
Director of Tribal Relations

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Scott Schuyler, Cultural, Natural Resources and Emergency Management, Upper Skagit Indian Tribe

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 11, 2025

Alexandria Byrd
Community Planning and Economic Development
City of Everett
2930 Wetmore Avenue, Suite 8A
Everett, WA 98201

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Ms Byrd

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

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February 11, 2025

Page 2

Sincerely,

A handwritten signature in black ink that reads "Eric Widstrand". The signature is written in a cursive, slightly slanted style.

Eric Widstrand

North Corridor Development Director – Everett Link Extension

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 11, 2025

Fred Wong
Staff Liaison
City of Lynnwood & Heritage Board
19100 44th Ave W
Lynnwood, WA 98036

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Mr Wong

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Sincerely,

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Eric Widstrand
North Corridor Development Director – Everett Link Extension

Enclosure:

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Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 11, 2025

Lynnwood-Alderwood Manor
PO Box 2206
Lynnwood, WA 98036

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

To whom it may concern:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

February 11, 2025

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Eric Widstrand
North Corridor Development Director – Everett Link Extension

Enclosure:

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Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 11, 2025

Allyson Brooks, PhD
State Historic Preservation Officer
Washington State Department of Archaeology and Historic Preservation
PO Box 48343
Olympia, WA 980504-8343

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Dr. Brooks

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Goran Sparrman

February 11, 2025

Page 2

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Eric Widstrand

North Corridor Development Director – Everett Link Extension

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation

Maureen Elenga, Washington State Department of Archaeology and Historic Preservation

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 11, 2025

Gretchen Kaehler
Snohomish County Archaeologist
Snohomish County Historical Commission
300 Rockefeller Avenue, 6th Flr Conference Room 6A02
Everett, WA 98201

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

Dear Ms Kaehler

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**INTERIM
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Goran Sparrman

February 11, 2025

Page 2

Sincerely,

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Eric Widstrand

North Corridor Development Director – Everett Link Extension

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



February 11, 2025

Gretchen Kaehler
Snohomish County Archaeologist
Snohomish County
300 Rockefeller Avenue
Everett, WA 98201

Subject: Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory and Survey Plan

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Goran Sparrman

Sound Transit Everett Link Extension Area of Potential Effect Revision and updated Cultural Resources Inventory
and Survey Plan
February 11, 2025
Page 2

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Eric Widstrand
North Corridor Development Director – Everett Link Extension

Enclosure:

APE Map Set (Attachment 1)

Everett Link Extension Cultural Resources Inventory and Survey Plan (Attachment 2)

cc:

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



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

March 4, 2025

Mr. Alexander Stevenson
Cultural Resources Program Manager
Sound Transit

In future correspondence please refer to:
Project Tracking Code: 2021-11-07529
Property: Snohomish County_ Everett Link Extension Project
Re: Revised APE Concur

Dear Mr. Stevenson:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced project. In response, we have reviewed your description and map of the revised area of potential effect (APE).

We concur with your definition of the revised APE. Along with the results of the inventory we will need to review your consultation with the concerned tribes, and other interested/affected parties. Please provide any correspondence or comments from concerned tribes and/or other parties that you receive as you consult for this project.

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with the signed Memorandum of Understanding with Sound Transit. Should additional information about the project become available, our assessment may be revised.

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw
Transportation Archaeologist
(360) 485-5014
dennis.wardlaw@dahp.wa.gov



From: Stephanie Trudel <strudel@Suquamish.nsn.us>
Sent: Tuesday, March 4, 2025 4:54 PM
To: Stevenson, Alex <alex.stevenson@soundtransit.org>
Subject: RE: [External] Sound Transit Everett Link Extension - Area of Potential Effect Revision

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Dear Alex,

Thank you for continuing consultation with the Suquamish Indian Tribe regarding the Everett Link Extension (EVLE) project. The Suquamish Tribe's Archaeology and Historic Preservation Program has reviewed the information provided and concurs with Sound Transit's revised definition of the APE.

Sincerely,
Stephanie

Stephanie Trudel
Tribal Historic Preservation Officer
Suquamish Tribe
PO Box 498
Suquamish, WA 98392-0498
360-394-8533
strudel@suquamish.nsn.us

From: Stevenson, Alex <alex.stevenson@soundtransit.org>
Sent: Monday, February 24, 2025 2:41 PM
To: Leonard Forsman <lforsman@suquamish.nsn.us>
Cc: Stephanie Trudel <strudel@Suquamish.nsn.us>; Hayes, Dezerae <Dezerae.Hayes@soundtransit.org>; Schreck, Jennifer <jennifer.schreck@soundtransit.org>; Rehmat, Hussein <hussein.rehmat@soundtransit.org>; Wardlaw, Dennis (DAHP) <Dennis.Wardlaw@dahp.wa.gov>; Haase, Rachel <rachel.haase@kimley-horn.com>
Subject: [External] Sound Transit Everett Link Extension - Area of Potential Effect Revision

Good afternoon Chair Forsman-

I am sending this on behalf of Dezerae Hayes, Sound Transit's Director of Tribal Relations.

Please see the attached and linked notification and technical documentation for the Sound Transit's Everett Link Extension Project.

[APE Revision - Feb 2025](#)

If you have any questions please reach out to Dezerae Hayes at Dezerae.Hayes@soundtransit.org or me at alex.stevenson@soundtransit.org.

Thank you!

Alex

Alex E. Stevenson
Manager - Cultural Resources
Sound Transit
Mobile: 206-419-5315

Pronouns: He/Him/His

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June 13, 2026

The Honorable Gerald Lewis
Chairman
Confederated Tribes and Bands of the Yakama Nation
401 Fort Road
Toppenish, WA 98948

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Lewis,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In February of 2025 Sound Transit transmitted correspondence to Confederated Tribes and Bands of the Yakama Nation, the State Historic Preservation Officer, Tribes and Consulting parties defining a revised project Area of Potential Effects (APE) and received concurrence from SHPO on the definition of the APE on March 4, 2025. Since that time, Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by Confederated Tribes and Bands of the Yakama Nation. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit SharePoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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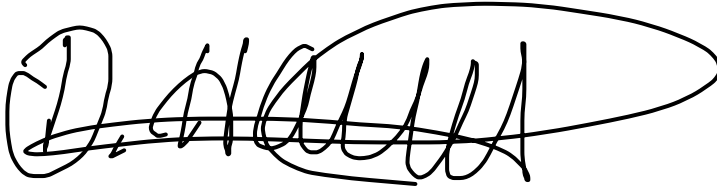
Girmay Zahilay
King County Council Chair

CHIEF EXECUTIVE OFFICER

Dow Constantine

Sound Transit Everett Link Extension NRHP Eligibility Consultation
June 13, 2025
Page 2

Sound Transit appreciates your time reviewing the enclosed materials and looks forward to your comments. Sound Transit requests that you provide comments within 45 days of receipt of this letter. If you have any questions please reach out to me via email at Dezerae.Hayes@Soundtransit.org

A handwritten signature in black ink, appearing to read 'D. Hayes', enclosed within a large, loopy oval shape.

Sincerely,
Dezerae Hayes
Tribal Relations – Director, Sound Transit

cc:
Rose Ferri, THPO, Confederated Tribes and Bands of the Yakama Nation
Casey Barney, Cultural Resources, Confederated Tribes and Bands of the Yakama Nation
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 16, 2025

The Honorable Dennis White III
Chairman
Confederated Tribes of Warm Springs Reservation of Oregon
PO Box 1299
Warm Springs, OR 97761

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair White -

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In February of 2025 Sound Transit transmitted correspondence to Warm Springs Tribes, the State Historic Preservation Officer, Tribes and Consulting parties defining a revised project Area of Potential Effects (APE) and received concurrence from SHPO on the definition of the APE on March 4, 2025. No comments were received from Warm Spring Tribes regarding the APE. Since that time, Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by Warm Springs Tribe. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit Sharepoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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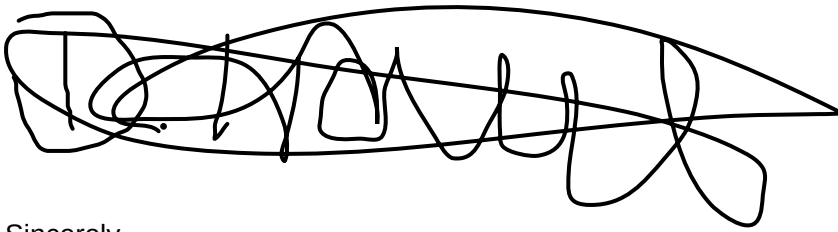
Girmay Zahilay
King County Council Chair

CHIEF EXECUTIVE OFFICER

Dow Constantine

Sound Transit Everett Link Extension NRHP Eligibility Consultation
June 16, 2025
Page 2

Sound Transit appreciates your time reviewing the enclosed materials and looks forward to your comments. Sound Transit requests that you provide comments within 45 days of receipt of this letter. If you have any questions please reach out to me via email at eric.widstrand@soundtransit.org.

A handwritten signature in black ink, appearing to read 'Dezerae Hayes', enclosed within a large, loopy oval shape.

Sincerely,
Dezerae Hayes
Tribal Relations – Director, Sound Transit

cc:
Robert Brunoe, Natural and Cultural Resources
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13 2025

The Honorable Cecile Hansen
Chairwoman
Duwamish Tribal Organization
4705 W Marginal Way SW
Seattle, WA, 98106

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chairwoman Hansen

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In February of 2025 Sound Transit transmitted correspondence to Duwamish Tribal Organization, the State Historic Preservation Officer, Tribes and Consulting parties defining a revised project Area of Potential Effects (APE) and received concurrence from SHPO on the definition of the APE on March 4, 2025. Since that time, Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by Duwamish Tribal Organization. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit SharePoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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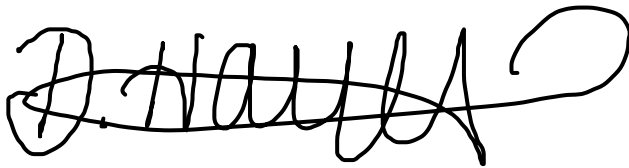
Kristina Walker
Tacoma Councilmember

Girmay Zahilay
King County Council Chair

CHIEF EXECUTIVE OFFICER

Dow Constantine

Sound Transit appreciates your time reviewing the enclosed materials and looks forward to your comments. Sound Transit requests that you provide comments within 45 days of receipt of this letter. If you have any questions please reach out to me via email at Dezerae.Hayes@Soundtransit.org

A handwritten signature in black ink, appearing to read 'D. Hayes', with a large, stylized flourish at the end.

Sincerely,
Dezerae Hayes
Tribal Relations – Director, Sound Transit

cc:
Nancy Sackman, Cultural Preservation Officer, Duwamish Tribal Organization
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2026

The Honorable Jaison Elkins
Chairman
Muckleshoot Indian Tribe
39015 172nd Ave SE
Auburn, WA 98092

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Elkins,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In February of 2025 Sound Transit transmitted correspondence to Muckleshoot Indian Tribe, the State Historic Preservation Officer, Tribes and Consulting parties defining a revised project Area of Potential Effects (APE) and received concurrence from SHPO on the definition of the APE on March 4, 2025. Since that time, Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by Muckleshoot Indian Tribe. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit SharePoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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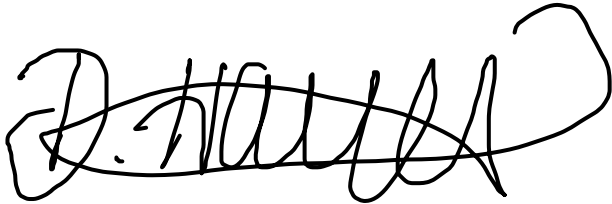
Kristina Walker
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King County Council Chair

CHIEF EXECUTIVE OFFICER

Dow Constantine

Sound Transit appreciates your time reviewing the enclosed materials and looks forward to your comments. Sound Transit requests that you provide comments within 45 days of receipt of this letter. If you have any questions please reach out to me via email at Dezerae.Hayes@Soundtransit.org

A handwritten signature in black ink, appearing to read 'D. Hayes', with a large, sweeping flourish extending from the end of the signature.

Sincerely,
Dezerae Hayes
Tribal Relations – Director, Sound Transit

cc:
Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2026

The Honorable Amber Caldera
Chairman
Port Gamble S'Klallam Tribe
31912 Little Boston Rd NE
Kingston, WA 98346-0155

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Caldera,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In February of 2025 Sound Transit transmitted correspondence to Port Gamble S'Klallam Tribe, the State Historic Preservation Officer, Tribes and Consulting parties defining a revised project Area of Potential Effects (APE) and received concurrence from SHPO on the definition of the APE on March 4, 2025. Since that time, Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by Port Gamble S'Klallam Tribe. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit SharePoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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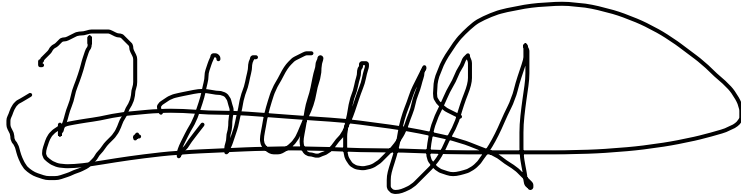
Girmay Zahilay
King County Council Chair

CHIEF EXECUTIVE OFFICER

Dow Constantine

Sound Transit Everett Link Extension NRHP Eligibility Consultation
June 13, 2025
Page 2

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Sincerely,
Dezerae Hayes
Tribal Relations – Director, Sound Transit

cc:
Laura Price, Cultural Resources, Port Gamble S'Klallam Tribe
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



July 18, 2025

The Honorable Nino Maltos
Chair
Sauk-Suiattle Indian Tribe
5318 Chief Brown Lane
Darrington, WA 98241

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Maltos,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In February of 2025 Sound Transit transmitted correspondence to Sauk-Suiattle Indian Tribe, the State Historic Preservation Officer, Tribes and Consulting parties defining a revised project Area of Potential Effects (APE) and received concurrence from SHPO on the definition of the APE on March 4, 2025. Since that time, Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by Sauk-Suiattle Indian Tribe. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit SharePoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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CHIEF EXECUTIVE OFFICER

Dow Constantine

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Sincerely,
Dezerae Hayes
Tribal Relations – Director, Sound Transit

cc:
Kevin Joseph, Cultural Resources
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2025

The Honorable Mike Evans
Chair
Snohomish Tribe of Indians
9792 Edmonds Way, Box 267
Edmonds, WA 98020

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Evans,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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A handwritten signature in black ink, appearing to read 'Dezerae Hayes', with a large, stylized initial 'D' and 'H'.

Sincerely,
Dezerae Hayes
Tribal Relations – Director, Sound Transit

cc:
Pamala SeaMonster, Vice Chair, Snohomish Tribe
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2026

The Honorable Robert de los Angeles
Chairman
Snoqualmie Indian Tribe
9571 Ethan Wade Way SE
Snoqualmie, WA 98065

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair de los Angeles,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In February of 2025 Sound Transit transmitted correspondence to Snoqualmie Indian Tribe, the State Historic Preservation Officer, Tribes and Consulting parties defining a revised project Area of Potential Effects (APE) and received concurrence from SHPO on the definition of the APE on March 4, 2025. Since that time, Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by Snoqualmie Indian Tribe. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit SharePoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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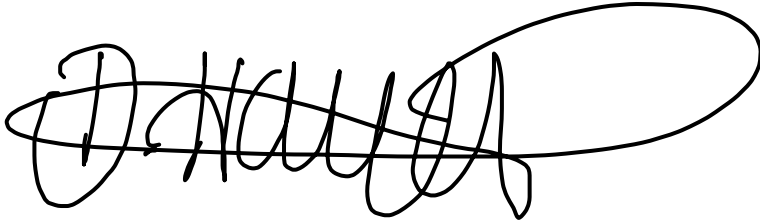
Kristina Walker
Tacoma Councilmember

Girmay Zahilay
King County Council Chair

CHIEF EXECUTIVE OFFICER

Dow Constantine

Sound Transit appreciates your time reviewing the enclosed materials and looks forward to your comments. Sound Transit requests that you provide comments within 45 days of receipt of this letter. If you have any questions please reach out to me via email at Dezerae.Hayes@Soundtransit.org

A handwritten signature in black ink, appearing to read 'Dezerae Hayes', with a large, loopy flourish extending from the end of the signature.

Sincerely,
Dezerae Hayes
Tribal Relations – Director, Sound Transit

cc:
Steven Moses, Director, Archaeology and Historic Preservation, Snoqualmie Indian Tribe
Adam Osbekoff, Snoqualmie Indian Tribe
Aaron Webster, Snoqualmie Indian Tribe
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2026

The Honorable Eric White
Chairman
Stillaguamish Tribe of Indians
3322 236th St NE
Arlington, WA 98223

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chairman White,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In February of 2025 Sound Transit transmitted correspondence to Stillaguamish Tribe of Indians, the State Historic Preservation Officer, Tribes and Consulting parties defining a revised project Area of Potential Effects (APE) and received concurrence from SHPO on the definition of the APE on March 4, 2025. Since that time, Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by Stillaguamish Tribe of Indians. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit SharePoint site located here: [NRHP Eligibility Consultation - June 2025](#)

CHAIR

Dave Somers
Snohomish County Executive

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Dow Constantine

Sound Transit appreciates your time reviewing the enclosed materials and looks forward to your comments. Sound Transit requests that you provide comments within 45 days of receipt of this letter. If you have any questions please reach out to me via email at Dezerae.Hayes@Soundtransit.org

A handwritten signature in black ink, appearing to read "D. Hayes", enclosed within a large, loopy oval shape.

Sincerely,
Dezerae Hayes
Tribal Relations – Director, Sound Transit

cc:
Shawn Yanity, Cultural Resources Director, Stillaguamish Tribe of Indians
Sam Barr, Cultural Resources, Stillaguamish Tribe of Indians
Nakita Strangeways, Stillaguamish Tribe of Indians
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2025

The Honorable Leonard Forsman
Chairman
Suquamish Indian Tribe of the Port Madison Reservation
18490 Suquamish Way
Suquamish, WA, 98392

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chairman Forsman

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In February of 2025 Sound Transit transmitted correspondence to Suquamish Indian Tribe of the Port Madison Reservation, the State Historic Preservation Officer, Tribes and Consulting parties defining a revised project Area of Potential Effects (APE) and received concurrence from SHPO on the definition of the APE on March 4, 2025. Additionally, in correspondence dated March 4, 2025 the Suquamish Tribe's Tribal Historic Preservation Officer concurred with the APE. Since that time, Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by Suquamish Indian Tribe of the Port Madison Reservation. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit SharePoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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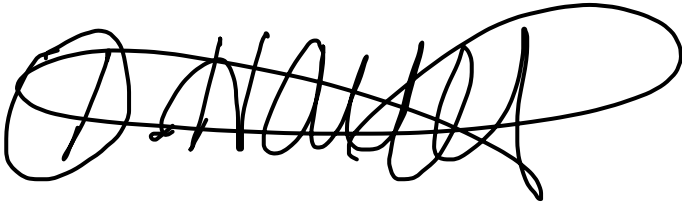
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Dow Constantine

Sound Transit Everett Link Extension NRHP Eligibility Consultation
June 13, 2025
Page 2

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A handwritten signature in black ink, appearing to read 'Dezerae Hayes', with a large, loopy flourish at the end.

Sincerely,
Dezerae Hayes
Tribal Relations – Director, Sound Transit

cc:

Stephanie Trudel, Cultural Resources, Suquamish Indian Tribe of the Port Madison Reservation
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2026

The Honorable Steve Edwards
Chairman
Swinomish Indian Tribal Community
11404 Morrage Way
La Conner, WA 98257-9450

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chairman Edwards,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In February of 2025 Sound Transit transmitted correspondence to Swinomish Indian Tribal Community, the State Historic Preservation Officer, Tribes and Consulting parties defining a revised project Area of Potential Effects (APE) and received concurrence from SHPO on the definition of the APE on March 4, 2025. Since that time, Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by Swinomish Indian Tribal Community. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit SharePoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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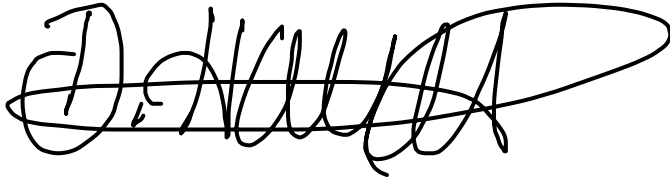
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Tacoma Councilmember

Girmay Zahilay
King County Council Chair

CHIEF EXECUTIVE OFFICER

Dow Constantine

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A handwritten signature in black ink, appearing to read 'D. Hayes', with a large, sweeping loop at the end.

Sincerely,
Dezerae Hayes
Tribal Relations – Director, Sound Transit

cc:
Josephine Jefferson, Tribal Historic Preservation Officer, Swinomish Tribal Community
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2026

The Honorable Teri Gobin
Chairwoman
Tulalip Tribes
6406 Marine Drive
Tulalip, WA 98271

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chairwoman Gobin,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In February of 2025 Sound Transit transmitted correspondence to Tulalip Tribes, the State Historic Preservation Officer, Tribes and Consulting parties defining a revised project Area of Potential Effects (APE) and received concurrence from SHPO on the definition of the APE on March 4, 2025. Since that time, Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by Tulalip Tribes. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit SharePoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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A handwritten signature in black ink, appearing to read 'Dezerae Hayes', enclosed within a large, loopy oval shape.

Sincerely,
Dezerae Hayes
Tribal Relations – Director, Sound Transit

cc:
Richard Young, Cultural Resources, Tulalip Tribes
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2026

The Honorable Jennfer Washington
Chair
Upper Skagit Indian Tribe
25944 Community Plaza Way
Sedro Woolley, WA 98284-9739

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Washington,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In February of 2025 Sound Transit transmitted correspondence to Upper Skagit Indian Tribe, the State Historic Preservation Officer, Tribes and Consulting parties defining a revised project Area of Potential Effects (APE) and received concurrence from SHPO on the definition of the APE on March 4, 2025. Since that time, Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by Upper Skagit Indian Tribe. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit SharePoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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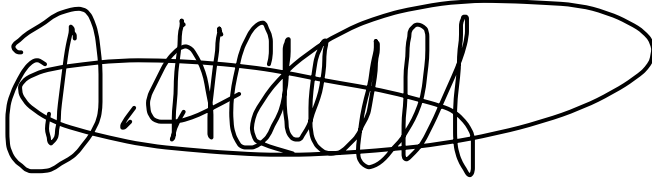
Kristina Walker
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King County Council Chair

CHIEF EXECUTIVE OFFICER

Dow Constantine

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Sincerely,
Dezerae Hayes
Tribal Relations – Director, Sound Transit

cc:
Scott Schuyler, Cultural, Natural Resources and Emergency Management, Upper Skagit Indian Tribe
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2025

Alexandria Byrd
Community Planning and Economic Development
City of Everett
2930 Wetmore Ave, Suite 8A
Everett, WA 98201

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Alexandria Byrd,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North). In February of 2025 Sound Transit in consultation with your organization, Tribes, the State Historic Preservation Officer and other Consulting parties revised the Area of Potential Effect for the Project and the State Historic Preservation officer concurred with that definition.

Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by your organization. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit Sharepoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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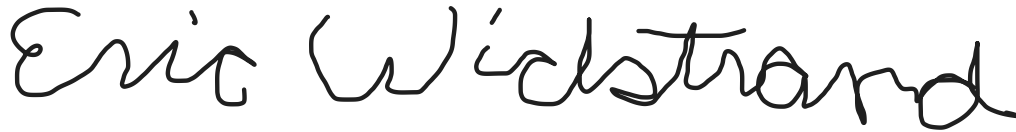
Dow Constantine

Sound Transit Everett Link Extension NRHP Eligibility Consultation

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www.soundtransit.org

June 13, 2025
Page 2

Sound Transit appreciates your time reviewing the enclosed materials and looks forward to your comments. Sound Transit requests that you provide comments within 45 days of receipt of this letter. If you have any questions please reach out to me via email at eric.widstrand@soundtransit.org.

A handwritten signature in black ink that reads "Eric Widstrand". The signature is written in a cursive, flowing style.

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2025

Fred Wong
Staff Liason
City of Lynnwood & Heritage Board
19100 44th Ave W
Lynnwood, WA 98036

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Fred Wong,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North). In February of 2025 Sound Transit in consultation with your organization, Tribes, the State Historic Preservation Officer and other Consulting parties revised the Area of Potential Effect for the Project and the State Historic Preservation officer concurred with that definition.

Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by your organization. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit Sharepoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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Dow Constantine

Sound Transit Everett Link Extension NRHP Eligibility Consultation

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www.soundtransit.org

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A handwritten signature in black ink that reads "Eric Widstrand". The signature is written in a cursive, flowing style.

Sincerely,

Eric Widstrand

North Corridor Development Director – Everett Link Extension

cc:

Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation

Maureen Elenga, Washington State Department of Archaeology and Historic Preservation

Alex Stevenson, Sound Transit

Jennifer Schreck, Sound Transit

Kathy Fendt, Sound Transit

Hussein Rehmat, Sound Transit



June 13, 2025

Lynnwood-Alderwood Manor Heritage
PO Box 2206
Lynnwood, WA 98036

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Lynnwood-Alderwood Manor Heritage Association,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North). In February of 2025 Sound Transit in consultation with your organization, Tribes, the State Historic Preservation Officer and other Consulting parties revised the Area of Potential Effect for the Project and the State Historic Preservation officer concurred with that definition.

Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by your organization. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit Sharepoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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Dow Constantine

Sound Transit Everett Link Extension NRHP Eligibility Consultation

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June 13, 2025
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Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2025

Allyson Brooks
State Historic Preservation Officer
Washington State Dept Archeology and Historic Preservation
PO Box 48343
Olympia, WA 98504-8343

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Dr. Brooks

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In February of 2025 Sound Transit transmitted correspondence with your office for the revised project Area of Potential Effects (APE) and your office concurred with the APE on March 4, 2025. Since that time, Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for your NRHP eligibility determinations. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit Sharepoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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King County Council Chair

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Dow Constantine

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Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2025

Gretchen Kaehler
Snohomish County Archaeologist
Snohomish County
300 Rockefeller Ave
Everett, WA 98201

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Gretchen Kaehler,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North). In February of 2025 Sound Transit in consultation with your organization, Tribes, the State Historic Preservation Officer and other Consulting parties revised the Area of Potential Effect for the Project and the State Historic Preservation officer concurred with that definition.

Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by your organization. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit Sharepoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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Sound Transit Everett Link Extension NRHP Eligibility Consultation

Central Puget Sound Regional Transit Authority • Union Station
401 S. Jackson St., Seattle, WA 98104 • Phone: 206-398-5000 • Fax: 206-398-5215
www.soundtransit.org

June 13, 2025
Page 2

Sound Transit appreciates your time reviewing the enclosed materials and looks forward to your comments. Sound Transit requests that you provide comments within 45 days of receipt of this letter. If you have any questions please reach out to me via email at eric.widstrand@soundtransit.org.

A handwritten signature in black ink that reads "Eric Widstrand". The signature is written in a cursive, flowing style.

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2025

Gretchen Kaehler
Snohomish County Historical Commission
300 Rockafeller Ave, 6th Flr Conf Rm 6A02
Everett, WA 98201

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Gretchen Kaehler,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North). In February of 2025 Sound Transit in consultation with your organization, Tribes, the State Historic Preservation Officer and other Consulting parties revised the Area of Potential Effect for the Project and the State Historic Preservation officer concurred with that definition.

Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by your organization. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit Sharepoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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Dow Constantine

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June 13, 2025
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Eric Widstrand
North Corridor Development Director – Everett Link Extension

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Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit



June 13, 2025

Chris Moore
Executive Director
Washington Trust for Historic Preservation
1204 Minor Ave.
Seattle, WA 98101

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Mr. Moore,

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) project, in Snohomish County Washington (Project). The EVLE project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood Transit Center (Lynnwood, WA) to the existing Everett train station vicinity (Everett, WA). The Project will include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In June of 2024 Sound Transit in consultation with your organization, Tribes, the State Historic Preservation Officer and other Consulting parties defined the Area of Potential Effect for the Project and the State Historic Preservation officer concurred with that definition. Since then Sound Transit has revised the APE to include newly identified project elements. Materials used to define the revised APE can be found here for your review and comment: [APE Revision - Feb 2025](#)

Additionally, Sound Transit has completed an inventory of historic built environment resources and conducted some archaeological inventory work within the APE. Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for the archaeological and historic built environment resources documented within the APE for NRHP eligibility determinations made by SHPO and for comment by your organization. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data. These resource forms and useful maps are located on the Sound Transit Sharepoint site located here: [NRHP Eligibility Consultation - June 2025](#)

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Dow Constantine

Sound Transit Everett Link Extension NRHP Eligibility Consultation
June 13, 2025
Page 2

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Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Kathy Fendt, Sound Transit
Hussein Rehmat, Sound Transit

DUWAMISH TRIBE dxʷdəwʔabš

Jul 17, 2025

Sound Transit

AE 0179-19 Task 5.5.5.16

Dear Dezerae Hayes & Alex Stevenson,

Thank you for the opportunity to comment on the inventory of historic built environment resources within the footprint of Sound Transit EVLE located at various locations in Everett & Lynnwood.

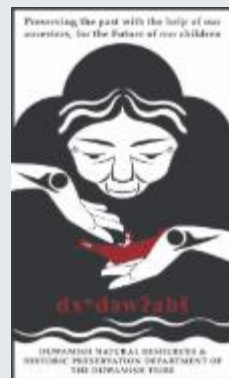
Based on the information provided and our understanding of the project and its APE, the Duwamish Tribe would concur with the list of structures recommended as eligible. The Tribe is mainly concerned with precontact, potential archaeological finds, but recognizes the other important work that DAHP and archaeologists do for post contact history and archaeology.

The Duwamish Tribe requests that if any archaeological work or monitoring is performed at the structures recommended as eligible, we would like notification. The Tribe would also like the opportunity to be present if or when an archaeologist is on site.

Thank you,

The logo for Duwamish Tribal Historic Preservation is written in a cursive, script font.

Duwamish Tribal Historic Preservation



Duwamish Tribe | 4705 W. Marginal Way SW, Seattle, WA 98106 | 206-431-1582

www.duwamishtribe.org



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

July 22, 2025

Alexander Stevenson
Cultural Resources Manager
Sound Transit

In future correspondence please refer to:
Project Tracking Code: 2021-11-07529
Property: Snohomish County_ Everett Link Extension Project
Re: NRHP Eligibility Determinations - Determined Eligible

Dear Alexander Stevenson:

Thank you for contacting the Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. This action has been reviewed on behalf of the State Historic Preservation Office (SHPO) under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation provided in your submittal.

Built Environment

We concur that the following properties are eligible for listing in the National Register of Historic Places (NRHP):

Property ID: 729197 House 2316 47th St SE, Everett, WA 98203
Property ID: 729216 Pacific First Federal Savings and Loan 3220 188th St SW, Lynnwood, WA 98037
Property ID: 729222 Ken Schoenfeld Furniture 19909 40th Ave W, Lynnwood, WA 98036
Property ID: 729232 Pioneer First Federal Savings and Loan Association 4111 Alderwood Mall Blvd, Lynnwood, WA 98036
Property ID: 729272 Western Six Motel 224 128th St SW, Everett, WA 98204
Property ID: 729274 General Telephone Company 426 E Casino Rd, Everett, WA 98208
Property ID: 271845 General Telephone Company facility 2403 W Casino Rd, Everett, WA 98204
Property ID: 265243 House 8102 W Glen Dr, Everett, WA 98203
Property ID: 732297 House 5529 Commercial Ave, Everett, WA 98203
Property ID: 270405 Lexington Arms Apartments 2508 Lexington Ave, Everett, WA 98203
Property ID: 49273 Washington Stove Works 3402 Smith Ave, Everett, WA 98201
Property ID: 270770 Callahan Plumbing and Heating 3211 Broadway, Everett, WA 98201
Property ID: 270547 Milwaukee Road Everett Depot 3201 McDougall Ave, Everett, WA 98201
Property ID: 270521 Warehouse 3008 McDougall Ave, Everett, WA 98201
Property ID: 256483 Duplex, Building 1 - 12227 Alexander Rd, Everett, WA 98204
Property ID: 732744 Empire Industrial Park, Building C 12414 Highway 99, Everett, WA 98204
Property ID: 49236 Everett Bottling Works 3231 Broadway, Everett, WA 98201
Property ID: 732816 House, Building A 12217 Alexander Rd, Everett, WA 98204
Property ID: 732817 House, Building B 12217 Alexander Rd, Everett, WA 98204



Property ID: 732818 House, Building C 12217 Alexander Rd, Everett, WA 98204
Property ID: 256798 Duplex, Building 1 - 12221 Alexander Rd, Everett, WA 98204
Property ID: 212483 House 2118 Jefferson Pl, Everett, WA 98203
Property ID: 216959 House 5531 S 3rd Ave, Everett, WA 98203
Property ID: 732994 House 7404 McDougall Ave, Everett, WA 98203
Property ID: 733008 House 8105 Spokane Dr, Everett, WA 98203
Property ID: 263079 House 1204 Darben Pl, Lynnwood, WA 98087
Property ID: 733490 Bank building 8500 Evergreen Way, Everett, WA 98208
Property ID: 225537 House 1322 Ballew Ave, Everett, WA 98203
Property ID: 241881 House 3224 Broadway, Everett, WA 98201
Property ID: 733673 Will Construction Co., Building 1 - 805 80th St SW, Everett, WA 98203
Property ID: 733885 Service station 2210 112th St SW, Everett, WA 98204
Property ID: 734929 Duplex, Building 2 - 12221 Alexander Rd, Everett, WA 98204
Property ID: 734932 Duplex, Building 3 - 12221 Alexander Rd, Everett, WA 98204
Property ID: 734933 Duplex, Building 4 - 12221 Alexander Rd, Everett, WA 98204
Property ID: 734934 Duplex, Building 2 - 12227 Alexander Rd, Everett, WA 98204
Property ID: 734936 Duplex, Building 3 - 12227 Alexander Rd, Everett, WA 98204
Property ID: 735131 Evergreen Cemetery 4504 Broadway, Everett, WA 98203

However, we do not concur that Property ID: 217267 Nelson, Nels Jr., House 4905 View Dr, Everett, WA 98203 is eligible for listing in the NRHP under criterion C or any other criteria. See Eligibility Review Comment Spreadsheet for further comment and for recordation of concurrence on non-eligible built environment properties.

Archaeology

We concur that Site 45SN85 and Site 45SN531 are not eligible for inclusion in the NRHP. We also concur that the three other sites that have not been assigned trinomials at this time are also not eligible for the NRHP.

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,



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





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

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3192
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

October 1, 2025

The Honorable Gerald Lewis
Chairman
Confederated Tribes and Bands of the Yakama Nation
401 Fort Road
Toppenish, WA 98948

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Chairman Lewis:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. FTA acknowledges the sovereign status of Indian Tribes and the requirement for government-to-government consultation in recognition of the unique legal relationship between federal and Tribal governments, as set forth in the Constitution of the United States, treaties, statutes, court decisions, and executive orders and memoranda. In honor of this relationship, we invite you to consult with us about the Project's potential effects on traditional cultural or ancestral properties, sacred sites, or properties of religious or cultural importance. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

Project Description

The Project will expand Link light rail transit service approximately 16 miles northward from the Lynnwood City Center Station to the Everett Station area in Snohomish County, Washington. The Project will provide light rail service to regional residential and job centers in Snohomish County's

growing urban areas. The Project is part of the Sound Transit 3 Plan of regional transit system investments, funding for which was approved by voters in the region in 2016. The Project includes the light rail alignment and stations, two new parking facilities, and an operations and maintenance facility (OMF).

Previous Consultation

Sound Transit, under its authority as lead agency for Washington State Environmental Policy Act compliance developed an agreement with the Washington State Department of Archaeology and Historic Preservation that formalized a process for consultation and cultural resources review entitled *Memorandum of Understanding Between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding Non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*. Your Tribe was invited to consult on the agreement, which was then executed on April 24, 2024, by the Washington State Historic Preservation Officer (SHPO) and Sound Transit's Chief Executive Officer. This agreement guided the cultural resource consultation process for the Project prior to FTA involvement, using methods consistent with Section 106 and FTA's Section 106 Standard Operating Procedures (SOP No. 21). The agreement allowed Sound Transit to consult with your Tribe on the eligibility of both historic built environment resources and archaeological resources, but the agreement precluded Sound Transit from conducting consultation on effects to historic properties. Sound Transit maintained a consultation log to record communications and decisions made from April 2024 through July 2025. Since the SHPO's determinations of National Register of Historic Places (NRHP) eligibility on July 22, 2025, no new resources have been identified within the proposed APE. The agreement and consultation log are provided in Attachment 1.

Definition of the Area of Potential Effects

The proposed APE generally extends from elements of the Project limits (e.g., guideway, stations, OMF, and construction staging areas) to the nearest tax parcel or a maximum of 200 feet where large tax parcels are adjacent to project elements. Where the Project limits enter shared interest and/or large parcels, the APE extends 200 feet into the parcel, unless the full parcel is more appropriately considered as a single site or as complex (e.g., a cemetery). The APE is depicted on the map set in Attachment 2.

The anticipated depths of disturbance of the Project are variable throughout the recommended APE. Deep ground disturbance is anticipated for construction of road undercrossings and drilled shafts or installation of columns used to support the elevated guideway where ground disturbance may exceed 150 feet below surface. Shallower ground disturbance (generally 5 to 20 feet below surface) is anticipated for access road construction, staging area use, utility work, and stormwater facilities. The APE vertical-limit depth for precontact and historic archaeological resources consists of the area that would be disturbed in constructing the Project up to the depth of sterile soils based on soil types, geologic setting, age of landforms, and modern disturbance.

Cultural Resources Survey and Inventory Plan

Sound Transit prepared a Survey and Inventory Plan for the Project and is using it to assist in the identification and evaluation of NRHP-eligible or NRHP-listed historic built environment and archaeological resources located within the APE, as well as in the assessment of effects to those resources. Sound Transit proposed the phased survey approach described in the Survey and

Inventory Plan based on site constraints, and it has been the subject of review and comment during consultation between Sound Transit and your Tribe in 2024 and 2025, as described previously. The Survey and Inventory Plan is included with this letter as Attachment 3.

Additional Section 106 Consulting Parties

FTA will contact the following officials and organizations to notify them of the undertaking, initiate Section 106 consultation, and request their comments: City of Everett, City of Lynnwood History & Heritage Board, Lynnwood-Alderwood Manor Heritage Association, Snohomish County, Snohomish County Historic Preservation Commission, and the Washington Trust for Historic Preservation.

Determination of Eligibility

FTA made determinations for the five archaeological sites and 704 built environment resources identified within the proposed APE, as follows:

- None of the archaeological resources are eligible for listing under the NRHP.
- Twenty-eight of the built environment resources are eligible for listing on the NRHP. Of the 28 eligible resources, one was previously determined eligible (Everett Depot, 270547) and one is the Alexander Road World War II-era housing historic district including 10 contributing resources that are not individually eligible for the NRHP.

Determination of Effect

The historic-era commercial property at 4111 Alderwood Mall Boulevard in Lynnwood (WISAARD Property ID 729232) is eligible for listing to the NRHP under Criterion C. The property will be adversely affected (demolished) by the Project under all build alternatives.

The historic-era residence at 2316 47th Street Southeast in Everett (WISAARD Property ID 729197) is eligible for listing to the NRHP under Criterion C. The property will be adversely affected (demolished) by the Project under all build alternatives.

Request for Comment

FTA requests your comments on the proposed APE for the Project within 30 days of receipt of this letter.

FTA also requests your comments on the following determinations within 30 days of receipt of this letter:

- The Project will result in adverse effects to two NRHP-eligible properties:
 - Historic-era commercial property at 4111 Alderwood Mall Boulevard, WISAARD Property ID 729232
 - Historic-era residence at 2316 47th Street Southeast, WISAARD Property ID 729197
- As such, the Project will have an Adverse Effect on Historic Properties.

Responses to the request for comment can be provided to FTA via regular mail or via email to Terence Plaskon using the email address at the end of this letter.

October 1, 2025

Page 4

These determinations are based on the Project as currently designed. However, the proposed APE is located within areas of moderate to high probability for archaeological resources based on proximity to known ethnographic locations, documented sites, and historic landforms as described in the Survey and Inventory Plan. Additionally, as design advances, new adverse effects on other historic-era built environment resources may be identified. FTA, in coordination with Sound Transit, will continue to identify, evaluate, and consult on effects on cultural resources as the Project advances through design.

Resolution of Adverse Effects – Programmatic Agreement

To resolve known adverse effects to historic properties, a Section 106 Programmatic Agreement (PA) will be developed for the Project in consultation with the SHPO, Tribes, and other consulting parties, per 36 CFR 800.14(b)(3). FTA will publish the draft PA with the Draft Environmental Impact Statement (EIS) and seek public comment on the agreement document. In addition, the Advisory Council on Historic Preservation will be notified of the Project adverse effect determination and the intent to develop a PA for the Project with an invitation to consult. The PA will continue to be refined through ongoing consultation as the Project moves forward to the Final EIS and Record of Decision.

If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Terence Plaskon at terence.plaskon@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher, PE
Regional Administrator

cc: Casey Barney, Cultural Resources, Confederated Tribes and Bands of the Yakama Nation
Rose Ferri, Cultural Resources, Interim THPO, Confederated Tribes and Bands of the Yakama Nation
Dennis Wardlaw, Transportation Archaeologist, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Architectural Historian-Transportation Project Reviewer, Washington State Department of Archaeology and Historic Preservation
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit
Kathy Fendt, North Corridor Environmental Manager, Sound Transit

Enclosures: Attachment 1 – EVLE Pre-Section 106 Consultation Materials
Attachment 2 – EVLE APE Map Set
Attachment 3 – EVLE Cultural Resources Survey and Inventory Plan
Attachment 4 – EVLE Section 106 Adverse Effects Figures



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

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3192
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

October 1, 2025

The Honorable Dennis White III
Chairman
Confederated Tribes of Warm Springs
1233 Veterans Street
PO Box C
Warm Springs, OR 97761

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Chairman White:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. FTA acknowledges the sovereign status of Indian Tribes and the requirement for government-to-government consultation in recognition of the unique legal relationship between federal and Tribal governments, as set forth in the Constitution of the United States, treaties, statutes, court decisions, and executive orders and memoranda. In honor of this relationship, we invite you to consult with us about the Project's potential effects on traditional cultural or ancestral properties, sacred sites, or properties of religious or cultural importance. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

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Project will provide light rail service to regional residential and job centers in Snohomish County's growing urban areas. The Project is part of the Sound Transit 3 Plan of regional transit system investments, funding for which was approved by voters in the region in 2016. The Project includes the light rail alignment and stations, two new parking facilities, and an operations and maintenance facility (OMF).

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Request for Comment

FTA requests your comments on the proposed APE for the Project within 30 days of receipt of this letter.

FTA also requests your comments on the following determinations within 30 days of receipt of this letter:

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- As such, the Project will have an Adverse Effect on Historic Properties.

Responses to the request for comment can be provided to FTA via regular mail or via email to Terence Plaskon using the email address at the end of this letter.

These determinations are based on the Project as currently designed. However, the proposed APE is located within areas of moderate to high probability for archaeological resources based on proximity to known ethnographic locations, documented sites, and historic landforms as described in the Survey and Inventory Plan. Additionally, as design advances, new adverse effects on other historic-era built environment resources may be identified. FTA, in coordination with Sound Transit, will continue to identify, evaluate, and consult on effects on cultural resources as the Project advances through design.

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If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Terence Plaskon at terence.plaskon@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher, PE
Regional Administrator

cc: Lawrence Squiemphen, Tribal Historic Preservation Officer, Confederated Tribes of Warm Springs
Dennis Wardlaw, Transportation Archaeologist, Washington State Department of Archaeology and Historic Preservation
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U.S. Department
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**Federal Transit
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REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3192
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

October 1, 2025

The Honorable Jaison Elkins
Chairman
Muckleshoot Indian Tribe
39015 172nd Avenue Southeast
Auburn, WA 98092

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Chairman Elkins:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. FTA acknowledges the sovereign status of Indian Tribes and the requirement for government-to-government consultation in recognition of the unique legal relationship between federal and Tribal governments, as set forth in the Constitution of the United States, treaties, statutes, court decisions, and executive orders and memoranda. In honor of this relationship, we invite you to consult with us about the Project's potential effects on traditional cultural or ancestral properties, sacred sites, or properties of religious or cultural importance. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

Project Description

The Project will expand Link light rail transit service approximately 16 miles northward from the Lynnwood City Center Station to the Everett Station area in Snohomish County, Washington. The Project will provide light rail service to regional residential and job centers in Snohomish County's

growing urban areas. The Project is part of the Sound Transit 3 Plan of regional transit system investments, funding for which was approved by voters in the region in 2016. The Project includes the light rail alignment and stations, two new parking facilities, and an operations and maintenance facility (OMF).

Previous Consultation

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Additional Section 106 Consulting Parties

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October 1, 2025

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Thank you for your consultation on the Project.

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Susan K. Fletcher, PE
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cc: Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe
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October 1, 2025

The Honorable Amber Caldera
Chair
Port Gamble S'Klallam Tribe
31912 Little Boston Road NE
Kingston, WA 98346

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Chair Caldera:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. FTA acknowledges the sovereign status of Indian Tribes and the requirement for government-to-government consultation in recognition of the unique legal relationship between federal and Tribal governments, as set forth in the Constitution of the United States, treaties, statutes, court decisions, and executive orders and memoranda. In honor of this relationship, we invite you to consult with us about the Project's potential effects on traditional cultural or ancestral properties, sacred sites, or properties of religious or cultural importance. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

Project Description

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growing urban areas. The Project is part of the Sound Transit 3 Plan of regional transit system investments, funding for which was approved by voters in the region in 2016. The Project includes the light rail alignment and stations, two new parking facilities, and an operations and maintenance facility (OMF).

Previous Consultation

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Request for Comment

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October 1, 2025

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Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher, PE
Regional Administrator

cc: Laura Price, Cultural Resources, Port Gamble S'Klallam Tribe
Misty Ives, Tribal Historic Preservation Officer, Port Gamble S'Klallam Tribe
Dennis Wardlaw, Transportation Archaeologist, Washington State Department of
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915 Second Avenue
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206-220-7954
206-220-7959 (fax)

October 1, 2025

The Honorable Nino Maltos
Chairman
Sauk - Suiattle Indian Tribe
5318 Chief Brown Lane
Darrington, WA 98241

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Chairman Maltos:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. FTA acknowledges the sovereign status of Indian Tribes and the requirement for government-to-government consultation in recognition of the unique legal relationship between federal and Tribal governments, as set forth in the Constitution of the United States, treaties, statutes, court decisions, and executive orders and memoranda. In honor of this relationship, we invite you to consult with us about the Project's potential effects on traditional cultural or ancestral properties, sacred sites, or properties of religious or cultural importance. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

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Susan K. Fletcher, PE
Regional Administrator

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206-220-7959 (fax)

October 1, 2025

The Honorable Robert de los Angeles
Chairman
Snoqualmie Indian Tribe
PO Box 969
Snoqualmie, WA 98065

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Chairman de los Angeles:

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October 1, 2025

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If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Terence Plaskon at terence.plaskon@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher, PE
Regional Administrator

cc: Steven Moses, Cultural Resources, Snoqualmie Indian Tribe
Adam Osbekoff, Cultural Resources Compliance Manager, Snoqualmie Indian Tribe
Aaron Webster, Staff Archaeologist, Snoqualmie Indian Tribe
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U.S. Department
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**Federal Transit
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REGION X
Alaska, Idaho, Oregon,
Washington

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206-220-7954
206-220-7959 (fax)

October 1, 2025

The Honorable Eric White
Chairman
Stillaguamish Tribe of Indians of Washington
3322 236th St. NE
Arlington, WA 98223

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Chairman White:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. FTA acknowledges the sovereign status of Indian Tribes and the requirement for government-to-government consultation in recognition of the unique legal relationship between federal and Tribal governments, as set forth in the Constitution of the United States, treaties, statutes, court decisions, and executive orders and memoranda. In honor of this relationship, we invite you to consult with us about the Project's potential effects on traditional cultural or ancestral properties, sacred sites, or properties of religious or cultural importance. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

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October 1, 2025

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Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher, PE
Regional Administrator

cc: Sam Barr, THPO Supervisor, Stillaguamish Tribe of Indians of Washington
Sean Yanity, Cultural Resources Director, Stillaguamish Tribe of Indians of Washington
Nakita Strangeways, Tribal Historic Preservation Officer, Stillaguamish Tribe of Indians of Washington
Dennis Wardlaw, Transportation Archaeologist, Washington State Department of Archaeology and Historic Preservation
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October 1, 2025

The Honorable Leonard Forsman
Chairman
Suquamish Indian Tribe of the Port Madison Reservation
PO Box 498
Suquamish, WA 98392

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Chairman Forsman:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. FTA acknowledges the sovereign status of Indian Tribes and the requirement for government-to-government consultation in recognition of the unique legal relationship between federal and Tribal governments, as set forth in the Constitution of the United States, treaties, statutes, court decisions, and executive orders and memoranda. In honor of this relationship, we invite you to consult with us about the Project's potential effects on traditional cultural or ancestral properties, sacred sites, or properties of religious or cultural importance. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

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October 1, 2025

The Honorable Steve Edwards
Chairman
Swinomish Indian Tribal Community
11404 Moorage Way
La Conner, WA 98257

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Chairman Edwards:

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If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Terence Plaskon at terence.plaskon@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher, PE
Regional Administrator

cc: Josephine Jefferson, Tribal Historic Preservation Officer, Swinomish Indian Tribal Community
Dennis Wardlaw, Transportation Archaeologist, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Architectural Historian-Transportation Project Reviewer, Washington State Department of Archaeology and Historic Preservation
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit
Kathy Fendt, North Corridor Environmental Manager, Sound Transit

Enclosures: Attachment 1 – EVLE Pre-Section 106 Consultation Materials
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U.S. Department
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**Federal Transit
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206-220-7959 (fax)

October 1, 2025

The Honorable Teri Gobin
Chair
Tulalip Tribes of Washington
6406 Marine Drive
Tulalip, WA 98271

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Chair Gobin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. FTA acknowledges the sovereign status of Indian Tribes and the requirement for government-to-government consultation in recognition of the unique legal relationship between federal and Tribal governments, as set forth in the Constitution of the United States, treaties, statutes, court decisions, and executive orders and memoranda. In honor of this relationship, we invite you to consult with us about the Project's potential effects on traditional cultural or ancestral properties, sacred sites, or properties of religious or cultural importance. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

Project Description

The Project will expand Link light rail transit service approximately 16 miles northward from the Lynnwood City Center Station to the Everett Station area in Snohomish County, Washington. The Project will provide light rail service to regional residential and job centers in Snohomish County's

growing urban areas. The Project is part of the Sound Transit 3 Plan of regional transit system investments, funding for which was approved by voters in the region in 2016. The Project includes the light rail alignment and stations, two new parking facilities, and an operations and maintenance facility (OMF).

Previous Consultation

Sound Transit, under its authority as lead agency for Washington State Environmental Policy Act compliance developed an agreement with the Washington State Department of Archaeology and Historic Preservation that formalized a process for consultation and cultural resources review entitled *Memorandum of Understanding Between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding Non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*. Your Tribe was invited to consult on the agreement, which was then executed on April 24, 2024, by the Washington State Historic Preservation Officer (SHPO) and Sound Transit's Chief Executive Officer. This agreement guided the cultural resource consultation process for the Project prior to FTA involvement, using methods consistent with Section 106 and FTA's Section 106 Standard Operating Procedures (SOP No. 21). The agreement allowed Sound Transit to consult with your Tribe on the eligibility of both historic built environment resources and archaeological resources, but the agreement precluded Sound Transit from conducting consultation on effects to historic properties. Sound Transit maintained a consultation log to record communications and decisions made from April 2024 through July 2025. Since the SHPO's determinations of National Register of Historic Places (NRHP) eligibility on July 22, 2025, no new resources have been identified within the proposed APE. The agreement and consultation log are provided in Attachment 1.

Definition of the Area of Potential Effects

The proposed APE generally extends from elements of the Project limits (e.g., guideway, stations, OMF, and construction staging areas) to the nearest tax parcel or a maximum of 200 feet where large tax parcels are adjacent to project elements. Where the Project limits enter shared interest and/or large parcels, the APE extends 200 feet into the parcel, unless the full parcel is more appropriately considered as a single site or as complex (e.g., a cemetery). The APE is depicted on the map set in Attachment 2.

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Cultural Resources Survey and Inventory Plan

Sound Transit prepared a Survey and Inventory Plan for the Project and is using it to assist in the identification and evaluation of NRHP-eligible or NRHP-listed historic built environment and archaeological resources located within the APE, as well as in the assessment of effects to those resources. Sound Transit proposed the phased survey approach described in the Survey and

Inventory Plan based on site constraints, and it has been the subject of review and comment during consultation between Sound Transit and your Tribe in 2024 and 2025, as described previously. The Survey and Inventory Plan is included with this letter as Attachment 3.

Additional Section 106 Consulting Parties

FTA will contact the following officials and organizations to notify them of the undertaking, initiate Section 106 consultation, and request their comments: City of Everett, City of Lynnwood History & Heritage Board, Lynnwood-Alderwood Manor Heritage Association, Snohomish County, Snohomish County Historic Preservation Commission, and the Washington Trust for Historic Preservation.

Determination of Eligibility

FTA made determinations for the five archaeological sites and 704 built environment resources identified within the proposed APE, as follows:

- None of the archaeological resources are eligible for listing under the NRHP.
- Twenty-eight of the built environment resources are eligible for listing on the NRHP. Of the 28 eligible resources, one was previously determined eligible (Everett Depot, 270547) and one is the Alexander Road World War II-era housing historic district including 10 contributing resources that are not individually eligible for the NRHP.

Determination of Effect

The historic-era commercial property at 4111 Alderwood Mall Boulevard in Lynnwood (WISAARD Property ID 729232) is eligible for listing to the NRHP under Criterion C. The property will be adversely affected (demolished) by the Project under all build alternatives.

The historic-era residence at 2316 47th Street Southeast in Everett (WISAARD Property ID 729197) is eligible for listing to the NRHP under Criterion C. The property will be adversely affected (demolished) by the Project under all build alternatives.

Request for Comment

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FTA also requests your comments on the following determinations within 30 days of receipt of this letter:

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Responses to the request for comment can be provided to FTA via regular mail or via email to Terence Plaskon using the email address at the end of this letter.

October 1, 2025

Page 4

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Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher, PE
Regional Administrator

cc: Richard Young, Cultural Resources, Tulalip Tribes of Washington
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Dezerae Hayes, Director of Tribal Relations, Sound Transit
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206-220-7959 (fax)

October 1, 2025

The Honorable Jennifer Washington
Chair
Upper Skagit Indian Tribe
25944 Community Plaza Way
Sedro-Woolley, WA 98284

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Chair Washington:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. FTA acknowledges the sovereign status of Indian Tribes and the requirement for government-to-government consultation in recognition of the unique legal relationship between federal and Tribal governments, as set forth in the Constitution of the United States, treaties, statutes, court decisions, and executive orders and memoranda. In honor of this relationship, we invite you to consult with us about the Project's potential effects on traditional cultural or ancestral properties, sacred sites, or properties of religious or cultural importance. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

Project Description

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growing urban areas. The Project is part of the Sound Transit 3 Plan of regional transit system investments, funding for which was approved by voters in the region in 2016. The Project includes the light rail alignment and stations, two new parking facilities, and an operations and maintenance facility (OMF).

Previous Consultation

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Request for Comment

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October 1, 2025

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If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Terence Plaskon at terence.plaskon@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher, PE
Regional Administrator

cc: Scott Schuyler, Cultural, Natural Resources and Emergency Management, Upper Skagit Indian Tribe
Dennis Wardlaw, Transportation Archaeologist, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Architectural Historian-Transportation Project Reviewer, Washington State Department of Archaeology and Historic Preservation
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit
Kathy Fendt, North Corridor Environmental Manager, Sound Transit

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October 1, 2025

Alexandria Byrd
Community Planning and Economic Development
City of Everett
2930 Wetmore Avenue, Suite 8A
Everett, WA 98201

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Alexandria Byrd:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

Project Description

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Susan K. Fletcher, PE
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cc: Alice Ann Wetzel, Long Range Planning Manager, City of Everett
Dennis Wardlaw, Transportation Archaeologist, Washington State Department of
Archaeology and Historic Preservation
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Washington State Department of Archaeology and Historic Preservation
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October 1, 2025

Fred Wong
Arts, Culture & Heritage Coordinator
City of Lynnwood History and Heritage Board
19100 44th Avenue West
Lynnwood, WA 98036

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Fred Wong:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

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- Twenty-eight of the built environment resources are eligible for listing on the NRHP. Of the 28 eligible resources, one was previously determined eligible (Everett Depot, 270547) and one is the Alexander Road World War II-era housing historic district including 10 contributing resources that are not individually eligible for the NRHP.

Determination of Effect

The historic-era commercial property at 4111 Alderwood Mall Boulevard in Lynnwood (WISAARD Property ID 729232) is eligible for listing to the NRHP under Criterion C. The property will be adversely affected (demolished) by the Project under all build alternatives.

The historic-era residence at 2316 47th Street Southeast in Everett (WISAARD Property ID 729197) is eligible for listing to the NRHP under Criterion C. The property will be adversely affected (demolished) by the Project under all build alternatives.

Request for Comment

FTA requests your comments on the proposed APE for the Project within 30 days of receipt of this letter.

FTA also requests your comments on the following determinations within 30 days of receipt of this letter:

- The Project will result in adverse effects to two NRHP-eligible properties:
 - Historic-era commercial property at 4111 Alderwood Mall Boulevard, WISAARD Property ID 729232
 - Historic-era residence at 2316 47th Street Southeast, WISAARD Property ID 729197
- As such, the Project will have an Adverse Effect on Historic Properties.

Responses to the request for comment can be provided to FTA via regular mail or via email to Terence Plaskon using the email address at the end of this letter.

These determinations are based on the Project as currently designed. However, the proposed APE is located within areas of moderate to high probability for archaeological resources based on proximity to known ethnographic locations, documented sites, and historic landforms as described in the Survey and Inventory Plan. Additionally, as design advances, new adverse effects on other historic-era built environment resources may be identified. FTA, in coordination with Sound Transit, will continue to identify, evaluate, and consult on effects on cultural resources as the Project advances through design.

Resolution of Adverse Effects – Programmatic Agreement

To resolve known adverse effects to historic properties, a Section 106 Programmatic Agreement (PA) will be developed for the Project in consultation with the SHPO, Tribes, and other consulting parties, per 36 CFR 800.14(b)(3). FTA will publish the draft PA with the

October 1, 2025

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Draft Environmental Impact Statement (EIS) and seek public comment on the agreement document. In addition, the Advisory Council on Historic Preservation will be notified of the Project adverse effect determination and the intent to develop a PA for the Project with an invitation to consult. The PA will continue to be refined through ongoing consultation as the Project moves forward to the Final EIS and Record of Decision.

If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Terence Plaskon at terence.plaskon@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher, PE
Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington State Department of
Archaeology and Historic Preservation
Maureen Elenga, Architectural Historian-Transportation Project Reviewer,
Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Cultural Resources Program Manager, Sound Transit
Kathy Fendt, North Corridor Environmental Manager, Sound Transit

Enclosures: Attachment 1 – EVLE Pre-Section 106 Consultation Materials
Attachment 2 – EVLE APE Map Set
Attachment 3 – EVLE Cultural Resources Survey and Inventory Plan
Attachment 4 – EVLE Section 106 Adverse Effects Figures



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October 1, 2025

Cheri Ryan
President
Lynnwood-Alderwood Manor Heritage Association
PO Box 2206
Lynnwood, WA 98036

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Cheri Ryan:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

Project Description

The Project will expand Link light rail transit service approximately 16 miles northward from the Lynnwood City Center Station to the Everett Station area in Snohomish County, Washington. The Project will provide light rail service to regional residential and job centers in Snohomish County's growing urban areas. The Project is part of the Sound Transit 3 Plan of regional transit system investments, funding for which was approved by voters in the region in 2016. The Project includes the light rail alignment and stations, two new parking facilities, and an operations and maintenance facility (OMF).

Previous Consultation

Sound Transit, under its authority as lead agency for Washington State Environmental Policy Act compliance, developed an agreement with the Washington State Department of Archaeology and Historic Preservation that formalized a process for consultation and cultural resources review entitled *Memorandum of Understanding Between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding Non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*. Sound Transit requested comments from the public, state agencies, Tribes, and certified local governments within the Sound Transit District about this agreement, which was then executed on April 24, 2024, by the Washington State Historic Preservation Officer (SHPO) and Sound Transit's Chief Executive Officer. This agreement guided the cultural resource consultation process for the Project prior to FTA involvement, using methods consistent with Section 106 and FTA's Section 106 Standard Operating Procedures (SOP No. 21). The agreement allowed Sound Transit to consult on the eligibility of both historic built environment resources and archaeological resources, but the agreement precluded Sound Transit from conducting consultation on effects to historic properties. Sound Transit maintained a consultation log to record communications and decisions made from April 2024 through July 2025. Since the SHPO's determinations of National Register of Historic Places (NRHP) eligibility on July 22, 2025, no new resources have been identified within the proposed APE. The agreement and consultation log are provided in Attachment 1.

Definition of the Area of Potential Effects

The proposed APE generally extends from elements of the Project limits (e.g., guideway, stations, OMF, and construction staging areas) to the nearest tax parcel or a maximum of 200 feet where large tax parcels are adjacent to project elements. Where the Project limits enter shared interest and/or large parcels, the APE extends 200 feet into the parcel, unless the full parcel is more appropriately considered as a single site or as complex (e.g., a cemetery). The APE is depicted on the map set in Attachment 2.

The anticipated depths of disturbance of the Project are variable throughout the recommended APE. Deep ground disturbance is anticipated for construction of road undercrossings and drilled shafts or installation of columns used to support the elevated guideway where ground disturbance may exceed 150 feet below surface. Shallower ground disturbance (generally 5 to 20 feet below surface) is anticipated for access road construction, staging area use, utility work, and stormwater facilities. The APE vertical-limit depth for precontact and historic archaeological resources consists of the area that would be disturbed in constructing the Project up to the depth of sterile soils based on soil types, geologic setting, age of landforms, and modern disturbance.

Cultural Resources Survey and Inventory Plan

Sound Transit prepared a Survey and Inventory Plan for the Project and is using it to assist in the identification and evaluation of NRHP-eligible or NRHP-listed historic built environment and archaeological resources located within the APE, as well as in the assessment of effects to those resources. Sound Transit proposed the phased survey approach described in the Survey and Inventory Plan based on site constraints, and it has been the subject of review and comment during consultation in 2024 and 2025, as described previously. The Survey and Inventory Plan is included with this letter as Attachment 3.

Determination of Eligibility

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Determination of Effect

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The historic-era residence at 2316 47th Street Southeast in Everett (WISAARD Property ID 729197) is eligible for listing to the NRHP under Criterion C. The property will be adversely affected (demolished) by the Project under all build alternatives.

Request for Comment

FTA requests your comments on the proposed APE for the Project within 30 days of receipt of this letter.

FTA also requests your comments on the following determinations within 30 days of receipt of this letter:

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 - Historic-era residence at 2316 47th Street Southeast, WISAARD Property ID 729197
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These determinations are based on the Project as currently designed. However, the proposed APE is located within areas of moderate to high probability for archaeological resources based on proximity to known ethnographic locations, documented sites, and historic landforms as described in the Survey and Inventory Plan. Additionally, as design advances, new adverse effects on other historic-era built environment resources may be identified. FTA, in coordination with Sound Transit, will continue to identify, evaluate, and consult on effects on cultural resources as the Project advances through design.

Resolution of Adverse Effects – Programmatic Agreement

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October 1, 2025

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If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Terence Plaskon at terence.plaskon@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher, PE
Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington State Department of
Archaeology and Historic Preservation
Maureen Elenga, Architectural Historian-Transportation Project Reviewer,
Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Cultural Resources Program Manager, Sound Transit
Kathy Fendt, North Corridor Environmental Manager, Sound Transit

Enclosures: Attachment 1 – EVLE Pre-Section 106 Consultation Materials
Attachment 2 – EVLE APE Map Set
Attachment 3 – EVLE Cultural Resources Survey and Inventory Plan
Attachment 4 – EVLE Section 106 Adverse Effects Figures



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October 1, 2025

Allyson Brooks, PhD
State Historic Preservation Officer
Washington State Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Dr. Brooks:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. With this letter, FTA is initiating Section 106 consultation for the Project and requesting your comments on the proposed Area of Potential Effects (APE) and the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan). FTA is also requesting your concurrence on findings of adverse effect under Section 106 for specific resources, as well as for the Project.

Project Description

The Project will expand Link light rail transit service approximately 16 miles northward from the Lynnwood City Center Station to the Everett Station area in Snohomish County, Washington. The Project will provide light rail service to regional residential and job centers in Snohomish County's growing urban areas. The Project is part of the Sound Transit 3 Plan of regional transit system investments, funding for which was approved by voters in the region in 2016. The Project includes the light rail alignment and stations, two new parking facilities, and an operations and maintenance facility (OMF).

Previous Consultation

Sound Transit, under its authority as lead agency for Washington State Environmental Policy Act compliance, developed an agreement with your office that formalized a process for consultation and cultural resources review entitled *Memorandum of Understanding Between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding Non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*. Federally recognized Tribes and entities identified as potential consulting parties were offered opportunities to provide input into the agreement, which was then executed on April 24, 2024, by the Washington State Historic Preservation Officer (SHPO) and Sound Transit's Chief Executive Officer. This agreement guided the cultural resource consultation process for the Project prior to FTA involvement, using methods consistent with Section 106 and FTA's Section 106 Standard Operating Procedures (SOP No. 21). The agreement allowed Sound Transit to consult with your office on federal, state, and local register status and eligibility of both historic built environment resources and archaeological resources, but the agreement precluded Sound Transit from conducting consultation on effects to historic properties. Sound Transit maintained a consultation log to record communications and decisions made from April 2024 through July 2025. Since the SHPO's determinations of National Register of Historic Places (NRHP) eligibility on July 22, 2025, no new resources have been identified within the proposed APE. The agreement and consultation log are provided in Attachment 1.

Definition of the Area of Potential Effects

The proposed APE generally extends from elements of the Project limits (e.g., guideway, stations, OMF, and construction staging areas) to the nearest tax parcel or a maximum of 200 feet where large tax parcels are adjacent to project elements. Where the Project limits enter shared interest and/or large parcels, the APE extends 200 feet into the parcel, unless the full parcel is more appropriately considered as a single site or as complex (e.g., a cemetery). The APE is depicted on the enclosed map set in Attachment 2.

The anticipated depths of disturbance of the Project are variable throughout the recommended APE. Deep ground disturbance is anticipated for construction of road undercrossings and drilled shafts or installation of columns used to support the elevated guideway where ground disturbance may exceed 150 feet below surface. Shallower ground disturbance (generally 5 to 20 feet below surface) is anticipated for access road construction, staging area use, utility work, and stormwater facilities. The APE vertical-limit depth for precontact and historic archaeological resources consists of the area that would be disturbed in constructing the Project up to the depth of sterile soils based on soil types, geologic setting, age of landforms, and modern disturbance.

Cultural Resources Survey and Inventory Plan

Sound Transit prepared a Survey and Inventory Plan for the Project and is using it to assist in the identification and evaluation of NRHP-eligible or NRHP-listed historic built environment and archaeological resources located within the APE, as well as in the assessment of effects to those resources. Sound Transit proposed the phased survey approach described in the Survey and Inventory Plan based on site constraints, and it has been the subject of review and comment during consultation between Sound Transit and your office in 2024 and 2025, as described previously. The Survey and Inventory Plan is included with this letter as Attachment 3.

Tribal Consultation

FTA is initiating Section 106 consultation with 11 federally recognized Tribes. This includes the Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of Warm Springs, Muckleshoot Indian Tribe, Port Gamble S'Klallam Tribe, Sauk-Suiattle Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians, Suquamish Indian Tribe of the Port Madison Reservation, Swinomish Indian Tribal Community, Tulalip Tribes of Washington, and the Upper Skagit Indian Tribe.

Additional Section 106 Consulting Parties

FTA is also initiating Section 106 consultation with the following additional consulting parties: City of Everett, City of Lynnwood History & Heritage Board, Lynnwood-Alderwood Manor Heritage Association, Snohomish County, Snohomish County Historic Preservation Commission, and the Washington Trust for Historic Preservation.

Determination of Eligibility

FTA made determinations for the five archaeological sites and 704 built environment resources identified within the proposed APE, as follows:

- None of the archaeological resources are eligible for listing under the NRHP.
- Twenty-eight of the built environment resources are eligible for listing on the NRHP. Of the 28 eligible resources, one was previously determined eligible (Everett Depot, 270547) and one is the Alexander Road World War II-era housing historic district including 10 contributing resources that are not individually eligible for the NRHP.

Determination of Effect

The historic-era commercial property at 4111 Alderwood Mall Boulevard (WISAARD Property ID 729232) in Lynnwood is eligible for listing to the NRHP under Criterion C. The property will be adversely affected (demolished) by the Project under all build alternatives.

The historic-era residence at 2316 47th Street Southeast (WISAARD Property ID 729197) in Everett is eligible for listing to the NRHP under Criterion C. The property will be adversely affected (demolished) by the Project under all build alternatives.

Request for Comment

FTA requests your comments on the proposed APE for the Project within 30 days of receipt of this letter. Comments can be provided to FTA via regular mail or via email to Terence Plaskon using the email address at the end of this letter.

Request for Concurrence

FTA requests your concurrence on the following determinations within 30 days of receipt of this letter:

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 - Historic-era commercial property at 4111 Alderwood Mall Boulevard, WISAARD Property ID 729232
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- As such, the Project will have an Adverse Effect on Historic Properties.

October 1, 2025

Page 4

Responses to this request can be provided to FTA via regular mail or via email to Terence Plaskon using the email address at the end of this letter.

These determinations are based on the Project as currently designed. However, the proposed APE is located within areas of moderate to high probability for archaeological resources based on proximity to known ethnographic locations, documented sites, and historic landforms as described in the Survey and Inventory Plan. Additionally, as design advances, new adverse effects on other historic-era built environment resources may be identified. FTA, in coordination with Sound Transit, will continue to identify, evaluate, and consult on effects to cultural resources as the Project advances through design.

Resolution of Adverse Effects – Programmatic Agreement

To resolve known adverse effects to historic properties, a Section 106 Programmatic Agreement (PA) will be developed for the Project in consultation with the SHPO, Tribes, and other consulting parties, per 36 CFR 800.14(b)(3). FTA will publish the draft PA with the Draft Environmental Impact Statement (EIS) and seek public comment on the agreement document. In addition, the Advisory Council on Historic Preservation will be notified of the Project adverse effect determination and the intent to develop a PA for the Project with an invitation to consult. The PA will continue to be refined through ongoing consultation as the Project moves forward to the Final EIS and Record of Decision.

If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Terence Plaskon at terence.plaskon@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher, PE
Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington State Department
of Archaeology and Historic Preservation
Maureen Elenga, Architectural Historian-Transportation Project Reviewer,
Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Cultural Resources Program Manager, Sound Transit
Kathy Fendt, North Corridor Environmental Manager, Sound Transit

Enclosures: Attachment 1 – EVLE Pre-Section 106 Consultation Materials
Attachment 2 – EVLE APE Map Set
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October 1, 2025

Gretchen Kaehler
Snohomish County Archaeologist
Snohomish County
3000 Rockefeller Ave., M/S 607
Everett, WA 98201

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Gretchen Kaehler:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

Project Description

The Project will expand Link light rail transit service approximately 16 miles northward from the Lynnwood City Center Station to the Everett Station area in Snohomish County, Washington. The Project will provide light rail service to regional residential and job centers in Snohomish County's growing urban areas. The Project is part of the Sound Transit 3 Plan of regional transit system investments, funding for which was approved by voters in the region in 2016. The Project includes the light rail alignment and stations, two new parking facilities, and an operations and maintenance facility (OMF).

Previous Consultation

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Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher, PE
Regional Administrator

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October 1, 2025

Gretchen Kaehler
Snohomish County Archaeologist
Snohomish County Historic Preservation Commission
3000 Rockefeller Ave, M/S 607
Everett, WA 98201

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Gretchen Kaehler:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

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Definition of the Area of Potential Effects

The proposed APE generally extends from elements of the Project limits (e.g., guideway, stations, OMF, and construction staging areas) to the nearest tax parcel or a maximum of 200 feet where large tax parcels are adjacent to project elements. Where the Project limits enter shared interest and/or large parcels, the APE extends 200 feet into the parcel, unless the full parcel is more appropriately considered as a single site or as complex (e.g., a cemetery). The APE is depicted on the map set in Attachment 2.

The anticipated depths of disturbance of the Project are variable throughout the recommended APE. Deep ground disturbance is anticipated for construction of road undercrossings and drilled shafts or installation of columns used to support the elevated guideway where ground disturbance may exceed 150 feet below surface. Shallower ground disturbance (generally 5 to 20 feet below surface) is anticipated for access road construction, staging area use, utility work, and stormwater facilities. The APE vertical-limit depth for precontact and historic archaeological resources consists of the area that would be disturbed in constructing the Project up to the depth of sterile soils based on soil types, geologic setting, age of landforms, and modern disturbance.

Cultural Resources Survey and Inventory Plan

Sound Transit prepared a Survey and Inventory Plan for the Project and is using it to assist in the identification and evaluation of NRHP-eligible or NRHP-listed historic built environment and archaeological resources located within the APE, as well as in the assessment of effects to those resources. Sound Transit proposed the phased survey approach described in the Survey and Inventory Plan based on site constraints, and it has been the subject of review and comment during consultation in 2024 and 2025, as described previously. The Survey and Inventory Plan is included with this letter as Attachment 3.

Determination of Eligibility

FTA made determinations for the five archaeological sites and 704 built environment resources identified within the proposed APE, as follows:

- None of the archaeological resources are eligible for listing under the NRHP.
- Twenty-eight of the built environment resources are eligible for listing on the NRHP. Of the 28 eligible resources, one was previously determined eligible (Everett Depot, 270547) and one is the Alexander Road World War II-era housing historic district including 10 contributing resources that are not individually eligible for the NRHP.

Determination of Effect

The historic-era commercial property at 4111 Alderwood Mall Boulevard in Lynnwood (WISAARD Property ID 729232) is eligible for listing to the NRHP under Criterion C. The property will be adversely affected (demolished) by the Project under all build alternatives.

The historic-era residence at 2316 47th Street Southeast in Everett (WISAARD Property ID 729197) is eligible for listing to the NRHP under Criterion C. The property will be adversely affected (demolished) by the Project under all build alternatives.

Request for Comment

FTA requests your comments on the proposed APE for the Project within 30 days of receipt of this letter.

FTA also requests your comments on the following determinations within 30 days of receipt of this letter:

- The Project will result in adverse effects to two NRHP-eligible properties:
 - Historic-era commercial property at 4111 Alderwood Mall Boulevard, WISAARD Property ID 729232
 - Historic-era residence at 2316 47th Street Southeast, WISAARD Property ID 729197
- As such, the Project will have an Adverse Effect on Historic Properties.

Responses to the request for comment can be provided to FTA via regular mail or via email to Terence Plaskon using the email address at the end of this letter.

These determinations are based on the Project as currently designed. However, the proposed APE is located within areas of moderate to high probability for archaeological resources based on proximity to known ethnographic locations, documented sites, and historic landforms as described in the Survey and Inventory Plan. Additionally, as design advances, new adverse effects on other historic-era built environment resources may be identified. FTA, in coordination with Sound Transit, will continue to identify, evaluate, and consult on effects on cultural resources as the Project advances through design.

Resolution of Adverse Effects – Programmatic Agreement

To resolve known adverse effects to historic properties, a Section 106 Programmatic Agreement (PA) will be developed for the Project in consultation with the SHPO, Tribes, and other consulting parties, per 36 CFR 800.14(b)(3). FTA will publish the draft PA with the

October 1, 2025

Page 4

Draft Environmental Impact Statement (EIS) and seek public comment on the agreement document. In addition, the Advisory Council on Historic Preservation will be notified of the Project adverse effect determination and the intent to develop a PA for the Project with an invitation to consult. The PA will continue to be refined through ongoing consultation as the Project moves forward to the Final EIS and Record of Decision.

If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Terence Plaskon at terence.plaskon@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher, PE
Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington State Department of
Archaeology and Historic Preservation
Maureen Elenga, Architectural Historian-Transportation Project Reviewer,
Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Cultural Resources Program Manager, Sound Transit
Kathy Fendt, North Corridor Environmental Manager, Sound Transit

Enclosures: Attachment 1 – EVLE Pre-Section 106 Consultation Materials
Attachment 2 – EVLE APE Map Set
Attachment 3 – EVLE Cultural Resources Survey and Inventory Plan
Attachment 4 – EVLE Section 106 Adverse Effects Figures



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

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3192
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

October 1, 2025

Chris Moore
Executive Director
Washington Trust for Historic Preservation
1201 Minor Avenue
Seattle, WA 98101

**Subject: Sound Transit
Everett Link Extension Project
National Historic Preservation Act, Section 106
Consultation Initiation, Eligibility, and Effect Determination**

Dear Chris Moore:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating consultation under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 800 for the proposed Everett Link Extension (EVLE) Project (Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106. With this letter, FTA is requesting your comments on the proposed Area of Potential Effects (APE), the Cultural Resources Survey and Inventory Plan (Survey and Inventory Plan), and findings of adverse effect under Section 106 for specific resources, as well as for the Project.

Project Description

The Project will expand Link light rail transit service approximately 16 miles northward from the Lynnwood City Center Station to the Everett Station area in Snohomish County, Washington. The Project will provide light rail service to regional residential and job centers in Snohomish County's growing urban areas. The Project is part of the Sound Transit 3 Plan of regional transit system investments, funding for which was approved by voters in the region in 2016. The Project includes the light rail alignment and stations, two new parking facilities, and an operations and maintenance facility (OMF).

Previous Consultation

Sound Transit, under its authority as lead agency for Washington State Environmental Policy Act compliance, developed an agreement with the Washington State Department of Archaeology and Historic Preservation that formalized a process for consultation and cultural resources review entitled *Memorandum of Understanding Between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding Non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*. Sound Transit requested comments from the public, state agencies, Tribes, and certified local governments within the Sound Transit District about this agreement, which was then executed on April 24, 2024, by the Washington State Historic Preservation Officer (SHPO) and Sound Transit's Chief Executive Officer. This agreement guided the cultural resource consultation process for the Project prior to FTA involvement, using methods consistent with Section 106 and FTA's Section 106 Standard Operating Procedures (SOP No. 21). The agreement allowed Sound Transit to consult on the eligibility of both historic built environment resources and archaeological resources, but the agreement precluded Sound Transit from conducting consultation on effects to historic properties. Sound Transit maintained a consultation log to record communications and decisions made from April 2024 through July 2025. Since the SHPO's determinations of National Register of Historic Places (NRHP) eligibility on July 22, 2025, no new resources have been identified within the proposed APE. The agreement and consultation log are provided in Attachment 1.

Definition of the Area of Potential Effects

The proposed APE generally extends from elements of the Project limits (e.g., guideway, stations, OMF, and construction staging areas) to the nearest tax parcel or a maximum of 200 feet where large tax parcels are adjacent to project elements. Where the Project limits enter shared interest and/or large parcels, the APE extends 200 feet into the parcel, unless the full parcel is more appropriately considered as a single site or as complex (e.g., a cemetery). The APE is depicted on the map set in Attachment 2.

The anticipated depths of disturbance of the Project are variable throughout the recommended APE. Deep ground disturbance is anticipated for construction of road undercrossings and drilled shafts or installation of columns used to support the elevated guideway where ground disturbance may exceed 150 feet below surface. Shallower ground disturbance (generally 5 to 20 feet below surface) is anticipated for access road construction, staging area use, utility work, and stormwater facilities. The APE vertical-limit depth for precontact and historic archaeological resources consists of the area that would be disturbed in constructing the Project up to the depth of sterile soils based on soil types, geologic setting, age of landforms, and modern disturbance.

Cultural Resources Survey and Inventory Plan

Sound Transit prepared a Survey and Inventory Plan for the Project and is using it to assist in the identification and evaluation of NRHP-eligible or NRHP-listed historic built environment and archaeological resources located within the APE, as well as in the assessment of effects to those resources. Sound Transit proposed the phased survey approach described in the Survey and Inventory Plan based on site constraints, and it has been the subject of review and comment during consultation in 2024 and 2025, as described previously. The Survey and Inventory Plan is included with this letter as Attachment 3.

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The historic-era residence at 2316 47th Street Southeast in Everett (WISAARD Property ID 729197) is eligible for listing to the NRHP under Criterion C. The property will be adversely affected (demolished) by the Project under all build alternatives.

Request for Comment

FTA requests your comments on the proposed APE for the Project within 30 days of receipt of this letter.

FTA also requests your comments on the following determinations within 30 days of receipt of this letter:

- The Project will result in adverse effects to two NRHP-eligible properties:
 - Historic-era commercial property at 4111 Alderwood Mall Boulevard, WISAARD Property ID 729232
 - Historic-era residence at 2316 47th Street Southeast, WISAARD Property ID 729197
- As such, the Project will have an Adverse Effect on Historic Properties.

Responses to the request for comment can be provided to FTA via regular mail or via email to Terence Plaskon using the email address at the end of this letter.

These determinations are based on the Project as currently designed. However, the proposed APE is located within areas of moderate to high probability for archaeological resources based on proximity to known ethnographic locations, documented sites, and historic landforms as described in the Survey and Inventory Plan. Additionally, as design advances, new adverse effects on other historic-era built environment resources may be identified. FTA, in coordination with Sound Transit, will continue to identify, evaluate, and consult on effects on cultural resources as the Project advances through design.

Resolution of Adverse Effects – Programmatic Agreement

To resolve known adverse effects to historic properties, a Section 106 Programmatic Agreement (PA) will be developed for the Project in consultation with the SHPO, Tribes, and other consulting parties, per 36 CFR 800.14(b)(3). FTA will publish the draft PA with the

October 1, 2025

Page 4

Draft Environmental Impact Statement (EIS) and seek public comment on the agreement document. In addition, the Advisory Council on Historic Preservation will be notified of the Project adverse effect determination and the intent to develop a PA for the Project with an invitation to consult. The PA will continue to be refined through ongoing consultation as the Project moves forward to the Final EIS and Record of Decision.

If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Terence Plaskon at terence.plaskon@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher, PE
Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington State Department of
Archaeology and Historic Preservation
Maureen Elenga, Architectural Historian-Transportation Project Reviewer,
Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Cultural Resources Program Manager, Sound Transit
Kathy Fendt, North Corridor Environmental Manager, Sound Transit

Enclosures: Attachment 1 – EVLE Pre-Section 106 Consultation Materials
Attachment 2 – EVLE APE Map Set
Attachment 3 – EVLE Cultural Resources Survey and Inventory Plan
Attachment 4 – EVLE Section 106 Adverse Effects Figures

From: Stephanie Trudel <strudel@Suquamish.nsn.us>
Sent: Tuesday, October 7, 2025 12:59 PM
To: Plaskon, Terence (FTA) <Terence.Plaskon@dot.gov>
Subject: RE: [External] RE: Sound Transit Everett Link Extension Project - Section 106 Consultation - Suquamish

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Terence,
Thank you for consulting with the Suquamish Indian Tribe and providing an opportunity for us to comment on the Everett Link Extension project. The Suquamish Tribe's Archaeology and Historic Preservation Program concurs with the definition of the APE and with FTA's findings of adverse effect to two NRHP-eligible properties.
Sincerely,
Stephanie

Stephanie Trudel
Tribal Historic Preservation Officer
Suquamish Tribe
PO Box 498
Suquamish, WA 98392-0498
360-394-8533
strudel@suquamish.nsn.us

From: Plaskon, Terence (FTA) <Terence.Plaskon@dot.gov>
Sent: Wednesday, October 1, 2025 3:34 PM
To: Leonard Forsman <lforsman@suquamish.nsn.us>
Cc: Stephanie Trudel <strudel@Suquamish.nsn.us>; dennis.wardlaw@dahp.wa.gov; Maureen.Elenga@dahp.wa.gov; Hayes, Dezerae <Dezerae.Hayes@soundtransit.org>; Stevenson, Alex <alex.stevenson@soundtransit.org>; Fendt, Kathy <kathy.fendt@soundtransit.org>; Ann Costanza (acostanza@anchorqea.com) <acostanza@anchorqea.com>; Tillinger, Todd (FTA) <todd.tillinger@dot.gov>
Subject: [External] RE: Sound Transit Everett Link Extension Project - Section 106 Consultation - Suquamish

Dear Chairman Forsman:

The Federal Transit Administration, in cooperation with Sound Transit, has prepared the attached letter initiating Section 106 consultation under the National Historic Preservation Act for the Everett Link Extension project (Project). The letter and four attachments – available at the link below - provide information about the Project, Area of Potential Effects, cultural resource survey and investigation methods, and eligibility and effect determinations.

Please let me know if you have any questions.

Terence Plaskon
Environmental Protection Specialist
Federal Transit Administration
U.S. Department of Transportation
terence.plaskon@dot.gov | www.transit.dot.gov (-> urldefense.com)

Link to attachments: [Section 106 Initiation, APE, Eligibility, and Effects Oct 2025](#)
If you have any troubles accessing the attachments, please contact Alex Stevenson at alex.stevenson@soundtransit.org

From: Fred Wong <FWong@lynnwoodwa.gov>
Sent: Wednesday, October 15, 2025 4:23 PM
To: Plaskon, Terence (FTA) <terence.plaskon@dot.gov>; Wong, Fred <arts@lynnwoodwa.gov>
Cc: dennis.wardlaw@dahp.wa.gov; Elenga, Maureen (DAHP) <maureen.elenga@dahp.wa.gov>; Stevenson, Alex <alex.stevenson@soundtransit.org>; Fendt, Kathy <kathy.fendt@soundtransit.org>; Ann Costanza <acostanza@anchoragea.com>; Tillinger, Todd (FTA) <todd.tillinger@dot.gov>
Subject: RE: Sound Transit Everett Link Extension Project - Section 106 Consultation - Lynnwood History and Heritage Board

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Hi Terence Plaskon
The Lynnwood History & Heritage Board has no comments.

Thanks, Fred

Fred Wong | Arts, Culture & Heritage Coordinator

Parks, Recreation & Cultural Arts Department
19100 44th Ave W, Lynnwood, WA 98036
Main: [425-670-5732](tel:425-670-5732) | Direct: [425-670-5502](tel:425-670-5502)
www.LynnwoodArts.org | www.HealthyLynnwood.com



LYNNWOOD
WASHINGTON

From: Plaskon, Terence (FTA) <Terence.Plaskon@dot.gov>
Sent: Wednesday, October 1, 2025 3:33 PM
To: SMB Lynnwood Arts <Arts@Lynnwoodwa.gov>
Cc: dennis.wardlaw@dahp.wa.gov; Maureen.Elenga@dahp.wa.gov; Stevenson, Alex <alex.stevenson@soundtransit.org>; Fendt, Kathy <kathy.fendt@soundtransit.org>; Ann Costanza (acostanza@anchoragea.com) <acostanza@anchoragea.com>; Tillinger, Todd (FTA) <todd.tillinger@dot.gov>
Subject: RE: Sound Transit Everett Link Extension Project - Section 106 Consultation - Lynnwood History and Heritage Board

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Fred Wong:

The Federal Transit Administration, in cooperation with Sound Transit, has prepared the attached letter initiating Section 106 consultation under the National Historic Preservation Act for the Everett Link Extension project (Project). The letter and four attachments – available at the link below - of Potential Effects, cultural resource survey and investigation methods, and eligibility and effect determinations.

Please let me know if you have any questions.

Terence Plaskon
Environmental Protection Specialist
Federal Transit Administration
U.S. Department of Transportation
terence.plaskon@dot.gov | www.transit.dot.gov

Link to attachments: [Section 106 Initiation, APE, Eligibility, and Effects Oct 2025](#)
If you have any troubles accessing the attachments, please contact Alex Stevenson at alex.stevenson@soundtransit.org



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

October 15, 2025

Susan Fletcher
Regional Administrator
Federal Transit Administration
915 Second Avenue
Federal Bldg. Suite 3192
Seattle, WA 98174-1002

In future correspondence please refer to:
Project Tracking Code: 2021-11-07529
Property: Snohomish County_ Everett Link Extension Project
Re: Adverse Effect

Dear Susan Fletcher:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) regarding the above-referenced federal undertaking. We reviewed the undertaking on behalf of the State Historic Preservation Office under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation provided in your submittal.

We concur that the following properties are eligible for listing in the National Register of Historic Places (NRHP):

Property ID: 729197 House 2316 47th St SE, Everett, WA 98203
Property ID: 729216 Pacific First Federal Savings and Loan 3220 188th St SW, Lynnwood, WA 98037
Property ID: 729222 Ken Schoenfeld Furniture 19909 40th Ave W, Lynnwood, WA 98036
Property ID: 729232 Pioneer First Federal Savings and Loan Association 4111 Alderwood Mall Blvd, Lynnwood, WA 98036
Property ID: 729272 Western Six Motel 224 128th St SW, Everett, WA 98204
Property ID: 729274 General Telephone Company 426 E Casino Rd, Everett, WA 98208
Property ID: 271845 General Telephone Company facility 2403 W Casino Rd, Everett, WA 98204
Property ID: 265243 House 8102 W Glen Dr, Everett, WA 98203
Property ID: 732297 House 5529 Commercial Ave, Everett, WA 98203
Property ID: 270405 Lexington Arms Apartments 2508 Lexington Ave, Everett, WA 98203
Property ID: 49273 Washington Stove Works 3402 Smith Ave, Everett, WA 98201
Property ID: 270770 Callahan Plumbing and Heating 3211 Broadway, Everett, WA 98201
Property ID: 270547 Milwaukee Road Everett Depot 3201 McDougall Ave, Everett, WA 98201
Property ID: 270521 Warehouse 3008 McDougall Ave, Everett, WA 98201
Property ID: 256483 Duplex, Building 1 - 12227 Alexander Rd, Everett, WA 98204
Property ID: 732744 Empire Industrial Park, Building C 12414 Highway 99, Everett, WA 98204
Property ID: 49236 Everett Bottling Works 3231 Broadway, Everett, WA 98201



Property ID: 732816 House, Building A 12217 Alexander Rd, Everett, WA 98204
 Property ID: 732817 House, Building B 12217 Alexander Rd, Everett, WA 98204
 Property ID: 732818 House, Building C 12217 Alexander Rd, Everett, WA 98204
 Property ID: 256798 Duplex, Building 1 - 12221 Alexander Rd, Everett, WA 98204
 Property ID: 212483 House 2118 Jefferson Pl, Everett, WA 98203
 Property ID: 216959 House 5531 S 3rd Ave, Everett, WA 98203
 Property ID: 732994 House 7404 McDougall Ave, Everett, WA 98203
 Property ID: 733008 House 8105 Spokane Dr, Everett, WA 98203
 Property ID: 263079 House 1204 Darben Pl, Lynnwood, WA 98087
 Property ID: 733490 Bank building 8500 Evergreen Way, Everett, WA 98208
 Property ID: 225537 House 1322 Ballew Ave, Everett, WA 98203
 Property ID: 241881 House 3224 Broadway, Everett, WA 98201
 Property ID: 733673 Will Construction Co., Building 1 - 805 80th St SW, Everett, WA 98203
 Property ID: 733885 Service station 2210 112th St SW, Everett, WA 98204
 Property ID: 734929 Duplex, Building 2 - 12221 Alexander Rd, Everett, WA 98204
 Property ID: 734932 Duplex, Building 3 - 12221 Alexander Rd, Everett, WA 98204
 Property ID: 734933 Duplex, Building 4 - 12221 Alexander Rd, Everett, WA 98204
 Property ID: 734934 Duplex, Building 2 - 12227 Alexander Rd, Everett, WA 98204
 Property ID: 734936 Duplex, Building 3 - 12227 Alexander Rd, Everett, WA 98204
 Property ID: 735131 Evergreen Cemetery 4504 Broadway, Everett, WA 98203

Our concurrence on properties recommended not eligible for the NRHP is recorded on the attached spreadsheet.

We also concur that Sites 45SN85, 45SN531, 45SN959, 45SN960, and 45SN961 are not eligible for inclusion in the NRHP.

Finally, we concur that the project as proposed will have an adverse effect on one or more historic properties listed in, or eligible for listing in, the NRHP.

Given our adverse effect determination, we look forward to working with you to develop an agreement to mitigate the adverse effect.

Please provide any correspondence or comments from concerned tribes and other interested parties as you consult under the requirements of 36 CFR 800.4(a)(4). Our comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in conformance with Section 106.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,



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





May 7, 2026

The Honorable Gerald Lewis
Chairman
Confederated Tribes and Bands of the Yakama Nation
401 Fort Road
Toppenish, WA 98948

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Lewis:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) Project in Snohomish County, Washington (Project). The EVLE Project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood City Center Station (Lynnwood, WA) to the existing Everett Station vicinity (Everett, WA). The Project would include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

Recently, Sound Transit has completed an additional inventory of four historic built environment resources within the APE and 16 additional resources added due to Advanced Conceptual Engineering (ACE). Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for these additional historic built environment resources for NRHP eligibility determinations to SHPO and for your comment. Each of the resource forms has been formally submitted on the Washington Information System for Architectural and Archaeological Record Data and are located on our Sharepoint site located here: [NRHP Eligibility Consultation - May 2026](#)

CHAIR

Dave Somers
Snohomish County Executive

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King County Councilmember

Kristina Walker
Tacoma Councilmember

Katie Wilson
Seattle Mayor

Girmay Zahilay
King County Executive

CHIEF EXECUTIVE OFFICER
Dow Constantine

Sound Transit appreciates your time reviewing the enclosed materials and looks forward to your comments. Sound Transit requests that you provide comments within 30 days of receipt of this letter. If you have any questions, please reach out to me via email at eric.widstrand@soundtransit.org.

Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Casey Barney, Cultural Resources, Confederated Tribes and Bands of the Yakama Nation
Rose Ferri, Cultural Resources, Interim THPO, Confederated Tribes and Bands of the Yakama Nation
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

The Honorable Dennis White III
Chairman
Confederated Tribes of Warm Springs
1233 Veterans Street, P.O. Box C
Warm Springs, OR 97761

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair White:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) Project in Snohomish County, Washington (Project). The EVLE Project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood City Center Station (Lynnwood, WA) to the existing Everett Station vicinity (Everett, WA). The Project would include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Washington State Secretary of Transportation

Teresa Mosqueda
King County Councilmember

David Parshall
Lynnwood Councilmember

Ed Prince
Renton Councilmember

Kim Roscoe
Fife Mayor

Dan Strauss
Seattle Councilmember

Peter von Reichbauer
King County Councilmember

Kristina Walker
Tacoma Councilmember

Katie Wilson
Seattle Mayor

Girmay Zahilay
King County Executive

CHIEF EXECUTIVE OFFICER
Dow Constantine

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Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Lawrence Squiemphen, Tribal Historic Preservation Officer, Confederated Tribes of Warm Springs
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

The Honorable Cecile Hansen
Chair
Duwamish Tribal Organization
4705 W Marginal Way SW
Seattle, WA 98106

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Hansen:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) Project in Snohomish County, Washington (Project). The EVLE Project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood City Center Station (Lynnwood, WA) to the existing Everett Station vicinity (Everett, WA). The Project would include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Dow Constantine

Sound Transit appreciates your time reviewing the enclosed materials and looks forward to your comments. Sound Transit requests that you provide comments within 30 days of receipt of this letter. If you have any questions, please reach out to me via email at eric.widstrand@soundtransit.org.

Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Nancy Sackman, Cultural Preservation Officer, Duwamish Tribal Organization
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

The Honorable Donny Stevenson
Chair
Muckleshoot Indian Tribe
39015 172nd Avenue Southeast
Auburn, WA 98092-9763

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Stevenson:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) Project in Snohomish County, Washington (Project). The EVLE Project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood City Center Station (Lynnwood, WA) to the existing Everett Station vicinity (Everett, WA). The Project would include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

The Honorable Amber Caldera
Chair
Port Gamble S'Klallam Tribe
31912 Little Boston Road NE
Kingston, WA 98346

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Caldera:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) Project in Snohomish County, Washington (Project). The EVLE Project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood City Center Station (Lynnwood, WA) to the existing Everett Station vicinity (Everett, WA). The Project would include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Laura Price, Cultural Resources, Port Gamble S'Klallam Tribe
Misty Ives, Tribal Historic Preservation Officer, Port Gamble S'Klallam Tribe
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

The Honorable Nino Maltos
Chairman
Sauk-Suiattle Indian Tribe
5318 Chief Brown Lane
Darrington, WA 98241

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Maltos:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) Project in Snohomish County, Washington (Project). The EVLE Project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood City Center Station (Lynnwood, WA) to the existing Everett Station vicinity (Everett, WA). The Project would include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Kevin Joseph, Tribal Historic Preservation Officer, Sauk-Suiattle Indian Tribe
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

The Honorable Carly Mathews
Chair
Snohomish Tribe
9792 Edmonds Way, Box 267
Edmonds, WA 98020

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Mathews:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) Project in Snohomish County, Washington (Project). The EVLE Project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood City Center Station (Lynnwood, WA) to the existing Everett Station vicinity (Everett, WA). The Project would include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Eric Widstrand

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Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

The Honorable Robert de los Angeles
Chairman
Snoqualmie Indian Tribe
P.O. Box 969
Snoqualmie, WA 98065

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair de los Angeles:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) Project in Snohomish County, Washington (Project). The EVLE Project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood City Center Station (Lynnwood, WA) to the existing Everett Station vicinity (Everett, WA). The Project would include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Eric Widstrand

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Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Steven Moses, Cultural Resources, Snoqualmie Indian Tribe
Adam Osbekoff, Cultural Resources Compliance Manager, Snoqualmie Indian Tribe
Aaron Webster, Staff Archaeologist, Snoqualmie Indian Tribe
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

The Honorable Eric White
Chairman
Stillaguamish Tribe of Indians
3322 236th Street NE
Arlington, WA 98223-0277

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair White:

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Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Sam Barr, THPO Supervisor, Stillaguamish Tribe of Indians of Washington
Sean Yanity, Cultural Resources Director, Stillaguamish Tribe of Indians of Washington
Nakita Strangeways, Tribal Historic Preservation Officer, Stillaguamish Tribe of Indians of Washington
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

The Honorable Leonard Forsman
Chairman
Suquamish Indian Tribe
P.O. Box 498
Suquamish, WA 98392-0498

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Forsman:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) Project in Snohomish County, Washington (Project). The EVLE Project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood City Center Station (Lynnwood, WA) to the existing Everett Station vicinity (Everett, WA). The Project would include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Stephanie Trudel, Tribal Historic Preservation Officer, Suquamish Indian Tribe of the Port Madison Reservation
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

The Honorable Steve Edwards
Chairman
Swinomish Indian Tribal Community
11404 Moorage Way
La Conner, WA 98257

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Edwards:

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CHIEF EXECUTIVE OFFICER

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questions, please reach out to me via email at eric.widstrand@soundtransit.org.

Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Josephine Jefferson, Tribal Historic Preservation Officer, Swinomish Indian Tribal Community
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

The Honorable Hazen Shopbell
Chair
Tulalip Tribes of Washington
6406 Marine Drive
Tulalip, WA 98271

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Shopbell:

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Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Richard Young, Cultural Resources, Tulalip Tribes of Washington
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

The Honorable Jennifer Washington
Chair
Upper Skagit Indian Tribe
25944 Community Plaza Way
Sedro-Woolley, WA 98284

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Chair Washington:

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comments within 30 days of receipt of this letter. If you have any questions, please reach out to me via email at eric.widstrand@soundtransit.org.

Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Scott Schuyler, Cultural, Natural Resources and Emergency Management, Upper Skagit Indian Tribe
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

Alexandria Byrd
Community Planning and Economic Development
City of Everett
2930 Wetmore Avenue
Everett, WA, 98201

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Ms. Byrd:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) Project in Snohomish County, Washington (Project). The EVLE Project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood City Center Station (Lynnwood, WA) to the existing Everett Station vicinity (Everett, WA). The Project would include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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comments within 30 days of receipt of this letter. If you have any questions, please reach out to me via email at eric.widstrand@soundtransit.org.

Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:
Alice Ann Wetzel, City of Everett Long Range Planning Manager
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

Fred Wong
Arts, Culture and Heritage Coordinator
City of Lynnwood
History and Heritage Board
19100 44th Avenue W
Lynnwood, WA, 98036

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Mr. Wong:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) Project in Snohomish County, Washington (Project). The EVLE Project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood City Center Station (Lynnwood, WA) to the existing Everett Station vicinity (Everett, WA). The Project would include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

Cheri Ryan
President
Lynnwood-Alderwood Manor Heritage Association
19903 Poplar Way
Lynnwood, WA, 98036

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Ms. Ryan:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) Project in Snohomish County, Washington (Project). The EVLE Project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood City Center Station (Lynnwood, WA) to the existing Everett Station vicinity (Everett, WA). The Project would include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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comments within 30 days of receipt of this letter. If you have any questions, please reach out to me via email at eric.widstrand@soundtransit.org.

Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

Dr. Allyson Brooks
State Historic Preservation Officer
Department of Archaeology and Historic Preservation
1110 S. Capitol Way, Suite 30
Olympia, WA, 98501

**Subject: Sound Transit Everett Link Extension NRHP Eligibility
Consultation (Project Code 2021-11-07529)**

Dear Dr. Brooks:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) Project in Snohomish County, Washington (Project). The EVLE Project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood City Center Station (Lynnwood, WA) to the existing Everett Station vicinity (Everett, WA). The Project would include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

In February of 2025 Sound Transit transmitted correspondence to your office for the revised project Area of Potential Effects (APE) and your office concurred with the APE on March 4, 2025. In June of 2025, Sound Transit transmitted the first batch of Historic Property Inventories (HPIs) within the Project APE and your office concurred on all but one resource on July 22, 2025. The one resource not concurred with was revised to align with your office's evaluation (Property ID 217267).

Since that time, Sound Transit has completed an additional inventory of four historic built environment resources within the APE and 16 additional resources added due to Advanced Conceptual Engineering (ACE). Following processes and terms outlined in the *Memorandum of Understanding between the Central Puget Sound Regional Transit Authority and Washington State Department of Archaeology and Historic Preservation Regarding non-Federalized Cultural Resources Consultation and Cultural Resources Review on the Everett Link Extension Project*, executed on April 24 2024, Sound Transit is now submitting the resource forms for these additional historic built environment resources for your NRHP eligibility determinations. Each of the resource forms has been

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Sound Transit appreciates your time reviewing the enclosed materials and looks forward to your determinations. Sound Transit requests that you provide comments within 30 days of receipt of this letter. If you have any questions, please reach out to me via email at eric.widstrand@soundtransit.org.

Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:

Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation
Maureen Elenga, Washington State Department of Archaeology and Historic Preservation
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

Gretchen Kaehler
Snohomish County Archaeologist
Snohomish County
3000 Rockefeller Avenue
Everett, WA, 98201

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Ms. Kaehler:

Sound Transit is preparing the Draft Environmental Impact Statement (EIS) for the Everett Link Extension (EVLE) Project in Snohomish County, Washington (Project). The EVLE Project would expand Sound Transit's Link light rail service north approximately 16 miles from the Lynnwood City Center Station (Lynnwood, WA) to the existing Everett Station vicinity (Everett, WA). The Project would include seven light rail stations, one of which is provisional (unfunded) at this time, as well as an operations and maintenance facility for light rail vehicles (OMF North).

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Eric Widstrand

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Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

Gretchen Kaehler
Snohomish County Archaeologist
Snohomish County Historic Preservation Commission
3000 Rockefeller Avenue
Everett, WA, 98201

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

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Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



May 7, 2026

Chris Moore
Executive Director
Washington Trust for Historic Preservation
1204 Minor Avenue
Seattle, WA, 98101

Subject: Sound Transit Everett Link Extension NRHP Eligibility Consultation

Dear Mr. Moore:

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Eric Widstrand

Sincerely,
Eric Widstrand
North Corridor Development Director – Everett Link Extension

cc:
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Galeeb Kachra, Sound Transit
Hussein Rehmat, Sound Transit



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

May 18, 2026

Eric Widstrand
Sound Transit
North Corridor Development Director
Everett Link Extension

In future correspondence please refer to:
Project Tracking Code: 2021-11-07529
Property: Snohomish County_ Everett Link Extension Project
Re: Determined Eligible

Dear Eric Widstrand:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) regarding the above-referenced federal undertaking. We reviewed the undertaking on behalf of the State Historic Preservation Office under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation provided in your submittal.

We concur that Property ID: 738701 House 17330 18th Ave W, Lynnwood, WA 98037 is eligible for listing in the National Register of Historic Places under Criterion C. We also concur that the following properties are not eligible for listing in the NRHP under any criteria:

- Property ID: 738582 Alderwood Manor Substation 3660 196th St SW, Lynnwood, WA 98036
- Property ID: 239524 House 16010 Motor Pl, Lynnwood, Washington, 98087
- Property ID: 738654 Martha Lake Substation 16014 Motor Pl, Lynnwood, WA 98087
- Property ID: 738699 House 17220 18th Ave W, Lynnwood, WA 98037
- Property ID: 738697 House 17112 18th Pl W, Lynnwood, WA 98037
- Property ID: 738704 House 17424 18th Ave W, Lynnwood, WA 98037
- Property ID: 738706 House 17602 18th Ave W, Lynnwood, WA 98037
- Property ID: 738707 House 17725 17th Ave W, Lynnwood, WA 98037
- Property ID: 222505 House 17620 18th Ave W, Lynnwood, WA 98037
- Property ID: 216012 House 17630 18th Ave W, Lynnwood, WA 98037
- Property ID: 241945 House 2324 63rd St SE, Everett, WA 98203
- Property ID: 738838 Chinook Mobile Home Park 12829 Highway 99, Everett, WA 98204
- Property ID: 222497 House 17215 18th Ave W, Lynnwood, WA 98037
- Property ID: 233515 House 17316 18th Ave W, Lynnwood, WA 98037
- Property ID: 732933 House 2511 Madison St, Everett, WA 98203
- Property ID: 212604 House 2503 60th St SE, Everett, WA 98203
- Property ID: 225551 House 2427 Lexington Ave, Everett, WA 98203
- Property ID: 243939 House 8220 Xavier Way, Everett, WA 98203
- Property ID: 733491 General Telephone Company 2312 W Casino Rd, Everett, WA 98204



We look forward to further consultation regarding your determination of effect on National Register listed and/or eligible properties in the area of potential effect. Please provide all correspondence or comments from concerned tribes and other parties as you consult under the requirements of 36 CFR 800.4(a)(4).

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,



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





Everett Link Extension

ATTACHMENT F

**Aerial Imagery, USGS Quadrangles, BLM GLO
Plats, and LiDAR Imagery of the APE by
Segment**

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1 WEST ALDERWOOD SEGMENT

Figure F1-1 West Alderwood Segment – 2024 Aerial Imagery

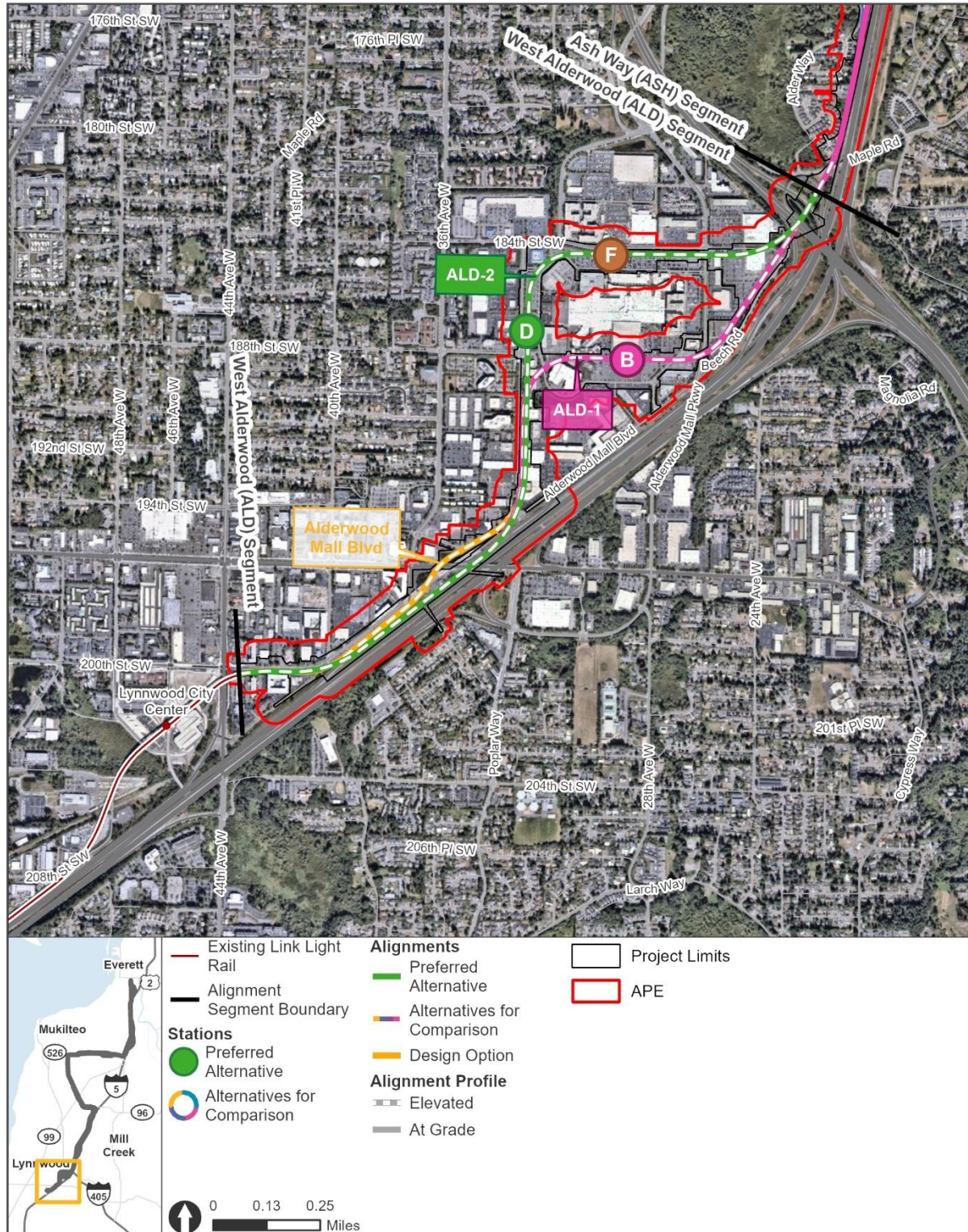


Figure F1-2 West Alderwood Segment – USGS Quadrangle

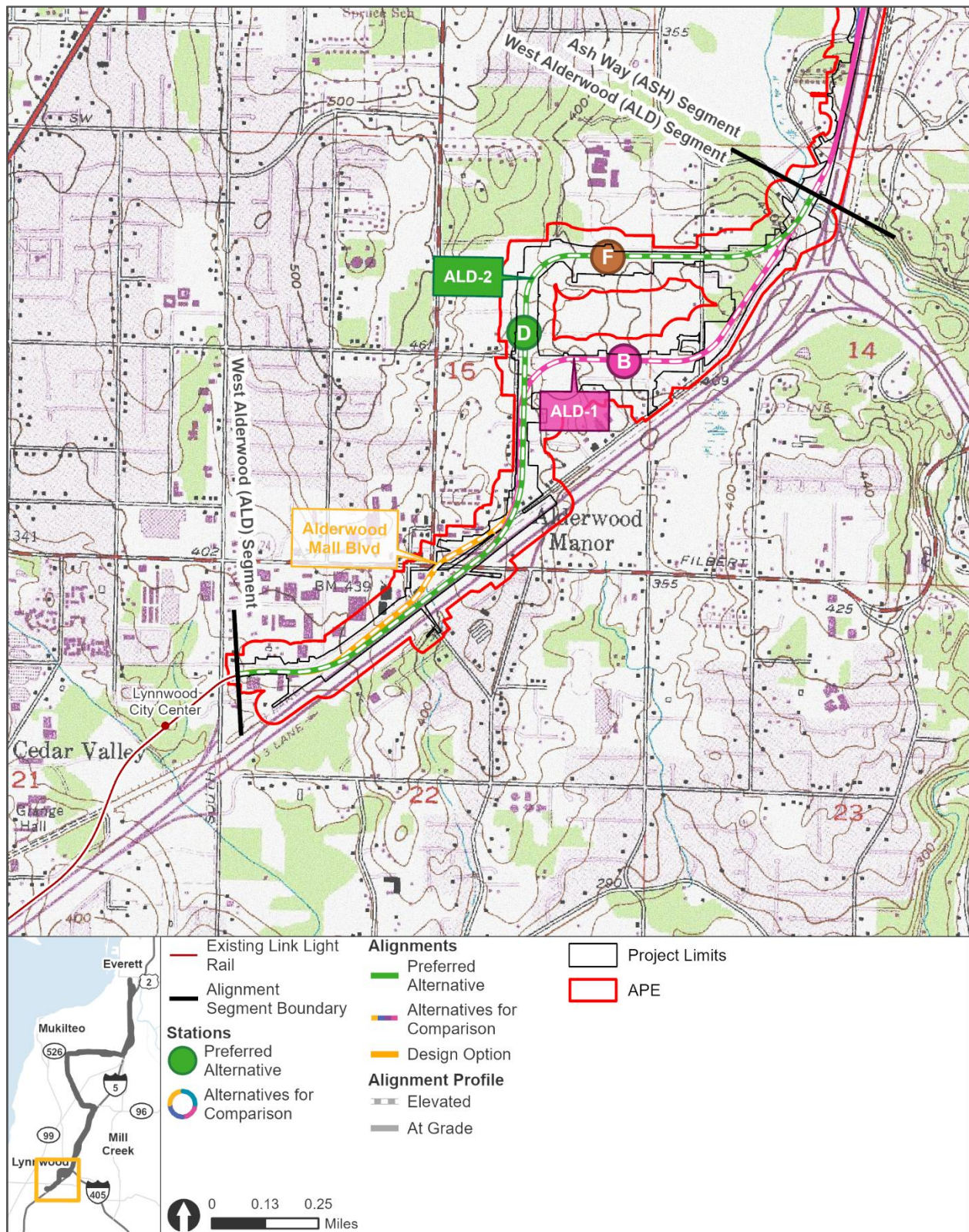


Figure F1-3 West Alderwood Segment – BLM GLO Plat Map

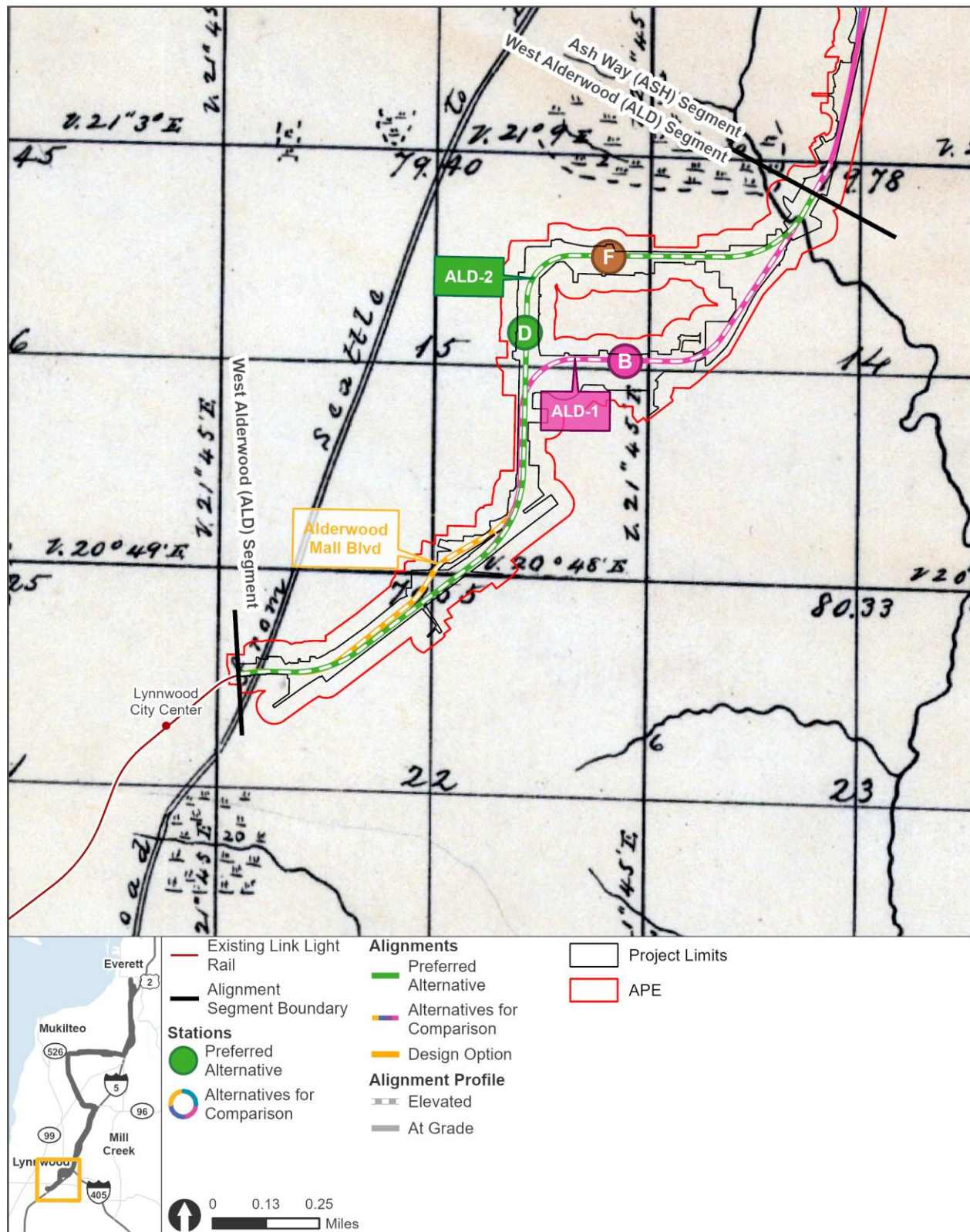
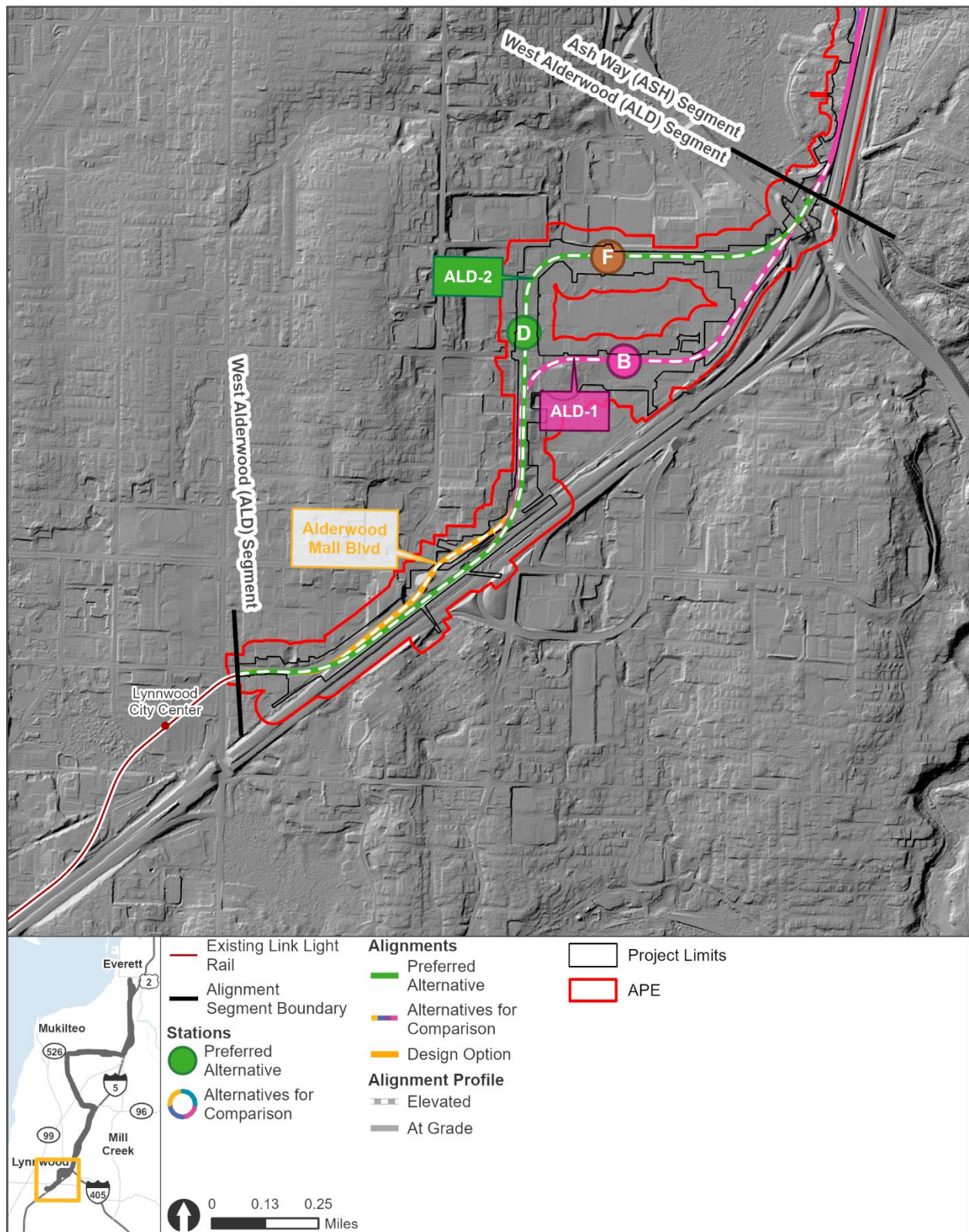


Figure F1-4 West Alderwood Segment – LiDAR Imagery



2 ASH WAY SEGMENT

Figure F2-1 Ash Way Segment (South) – 2024 Aerial Imagery

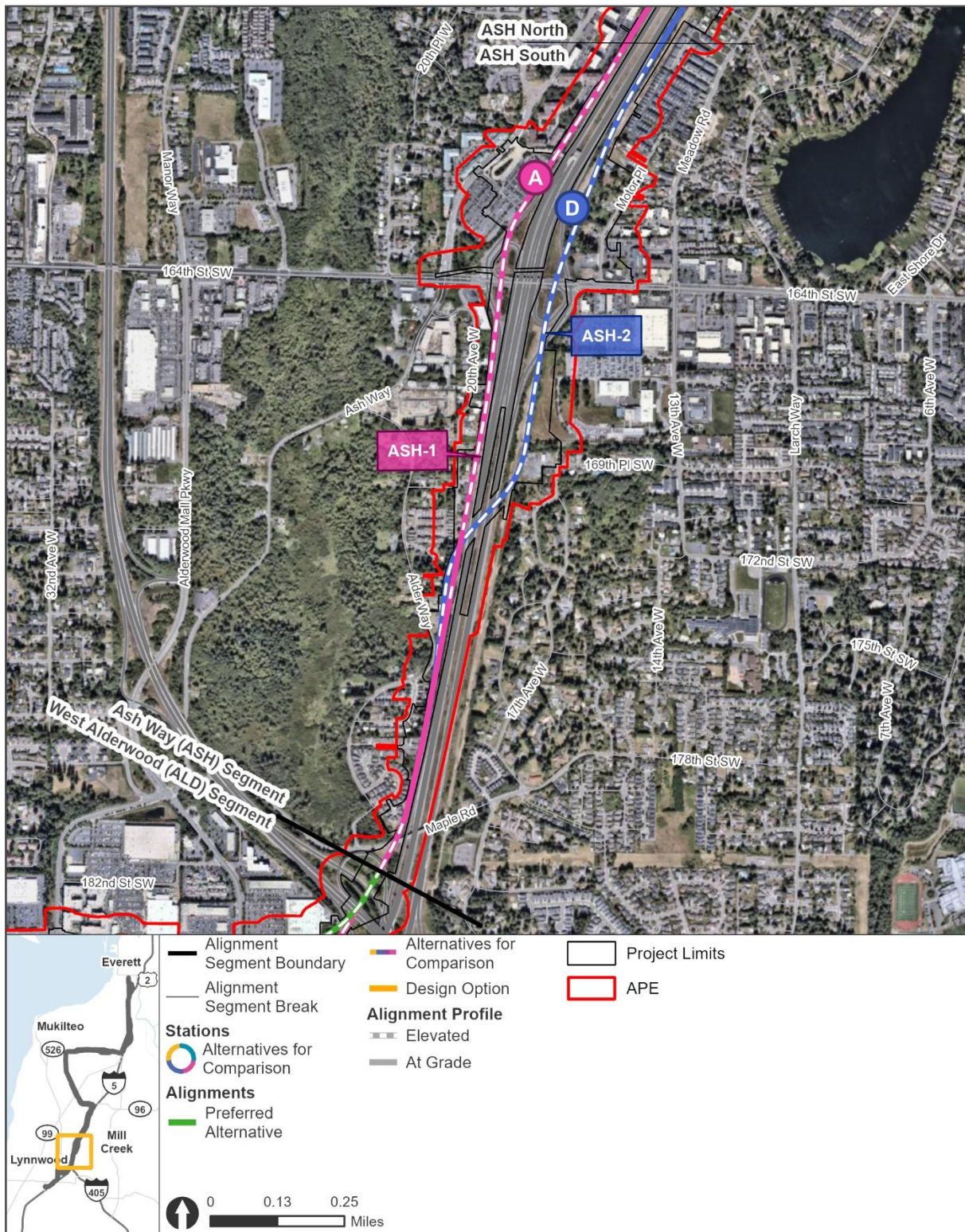


Figure F2-2 Ash Way Segment (North) – 2024 Aerial Imagery

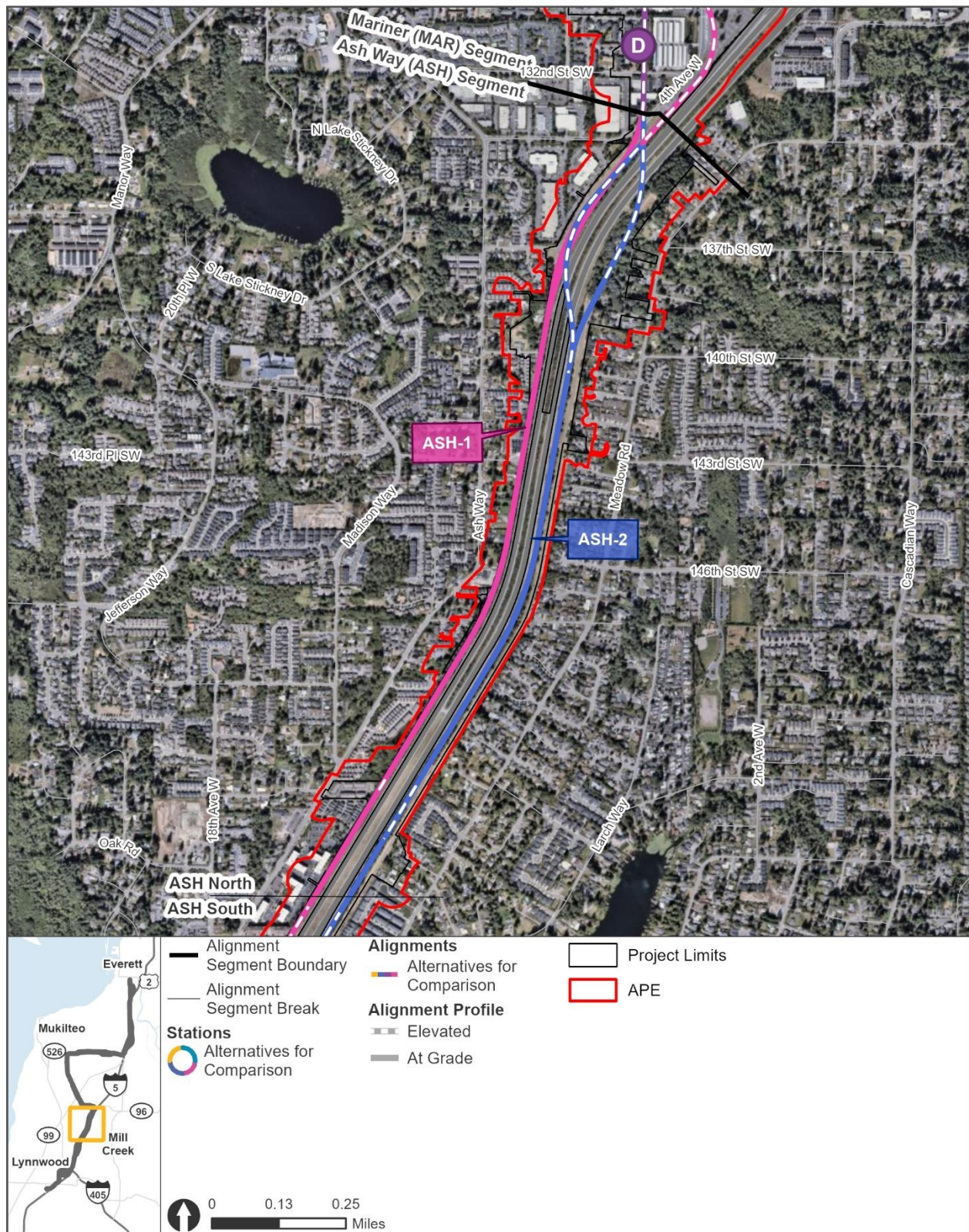


Figure F2-3 Ash Way Segment (South) – USGS Quadrangle

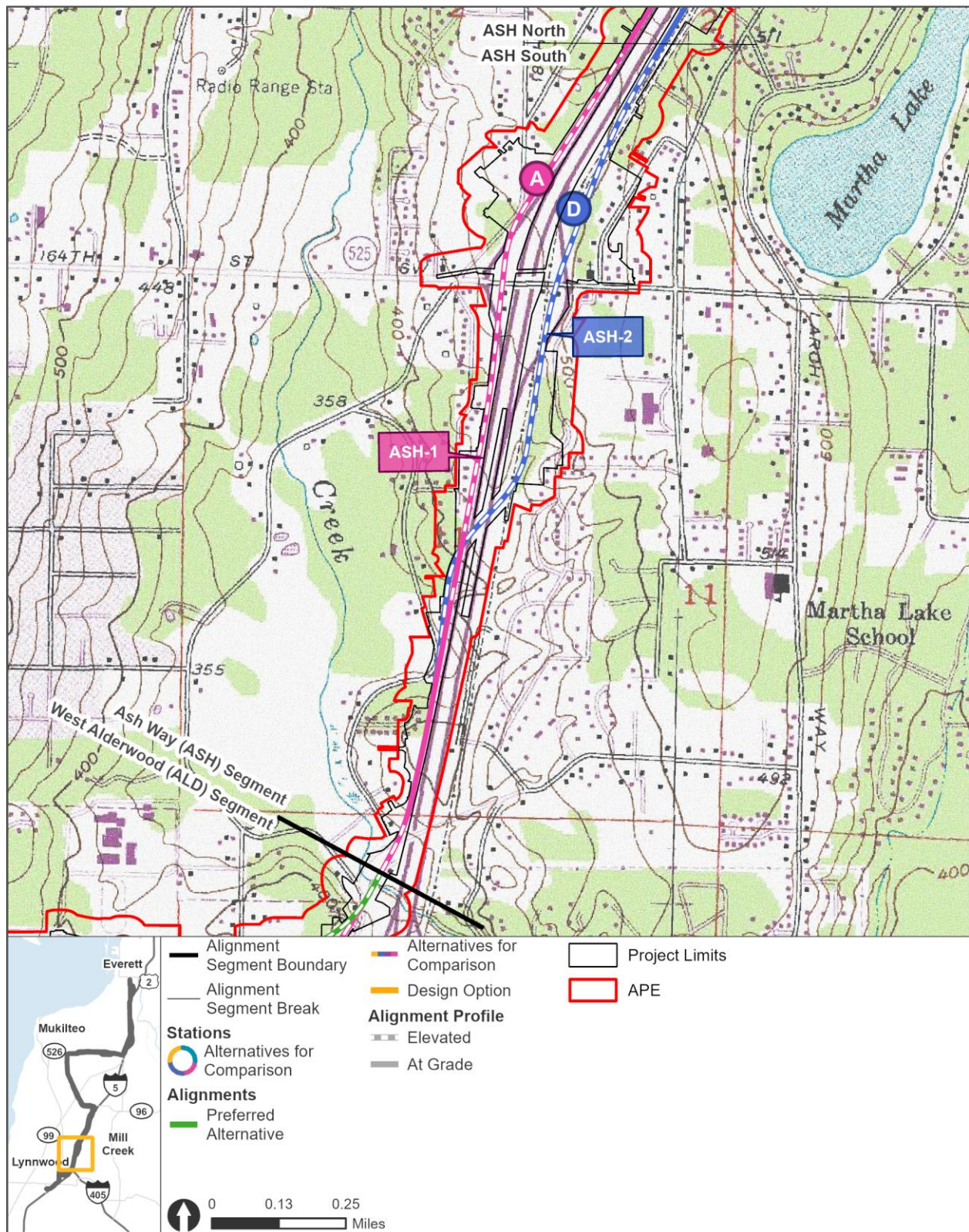


Figure F2-4 Ash Way Segment (North) – USGS Quadrangle

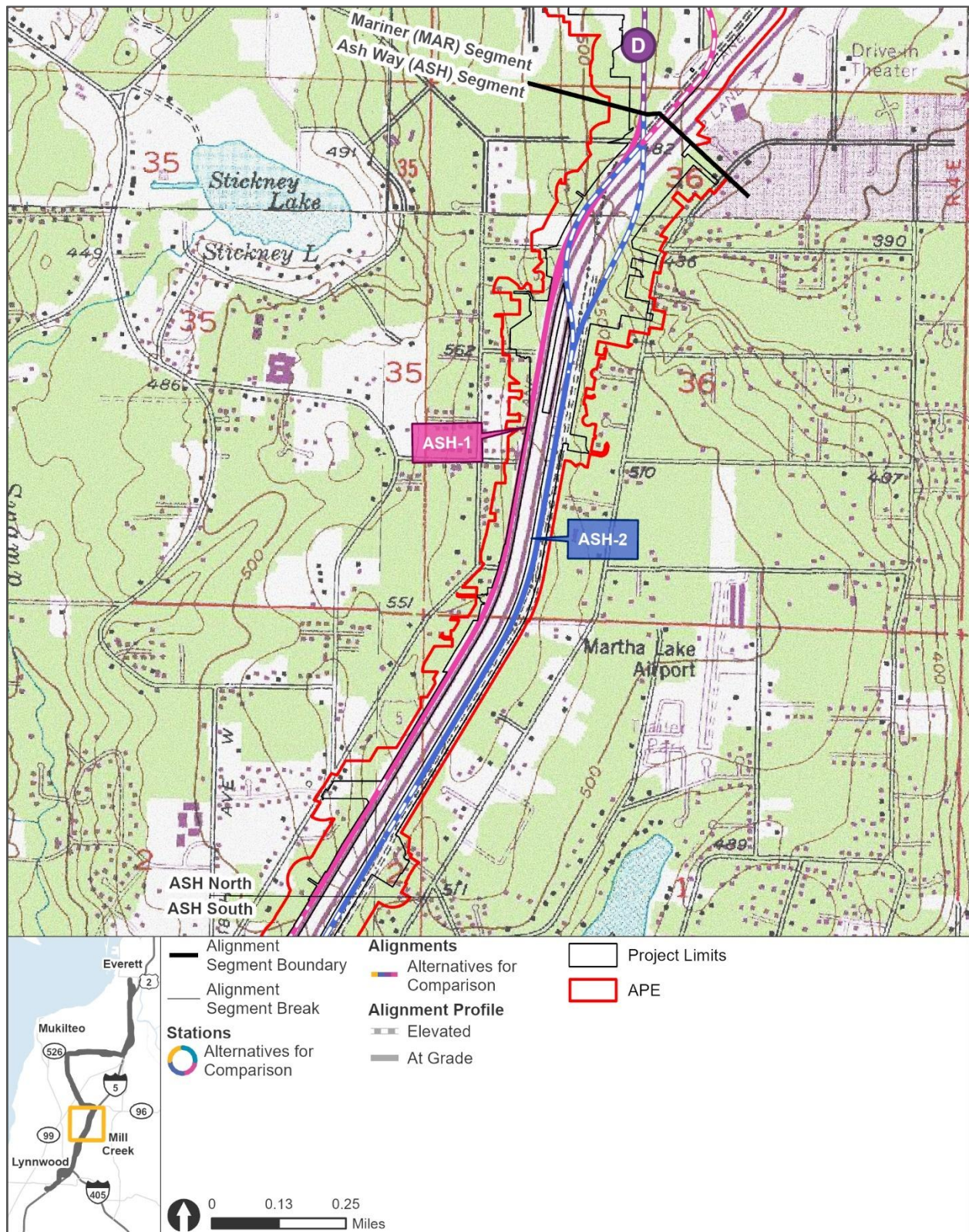


Figure F2-5 Ash Way Segment (South) – BLM GLO Plat

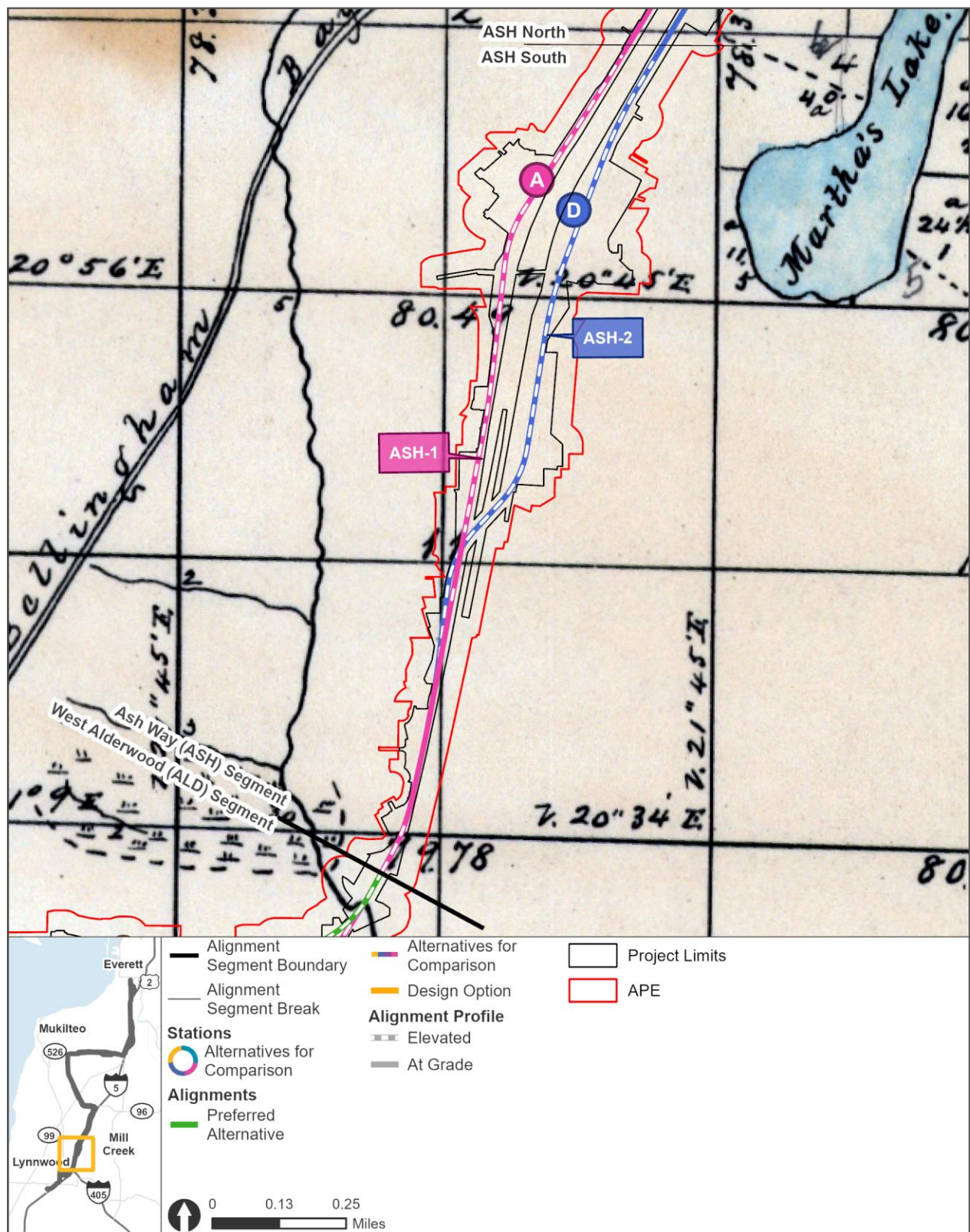


Figure F2-6 Ash Way Segment (North) – BLM GLO Plat

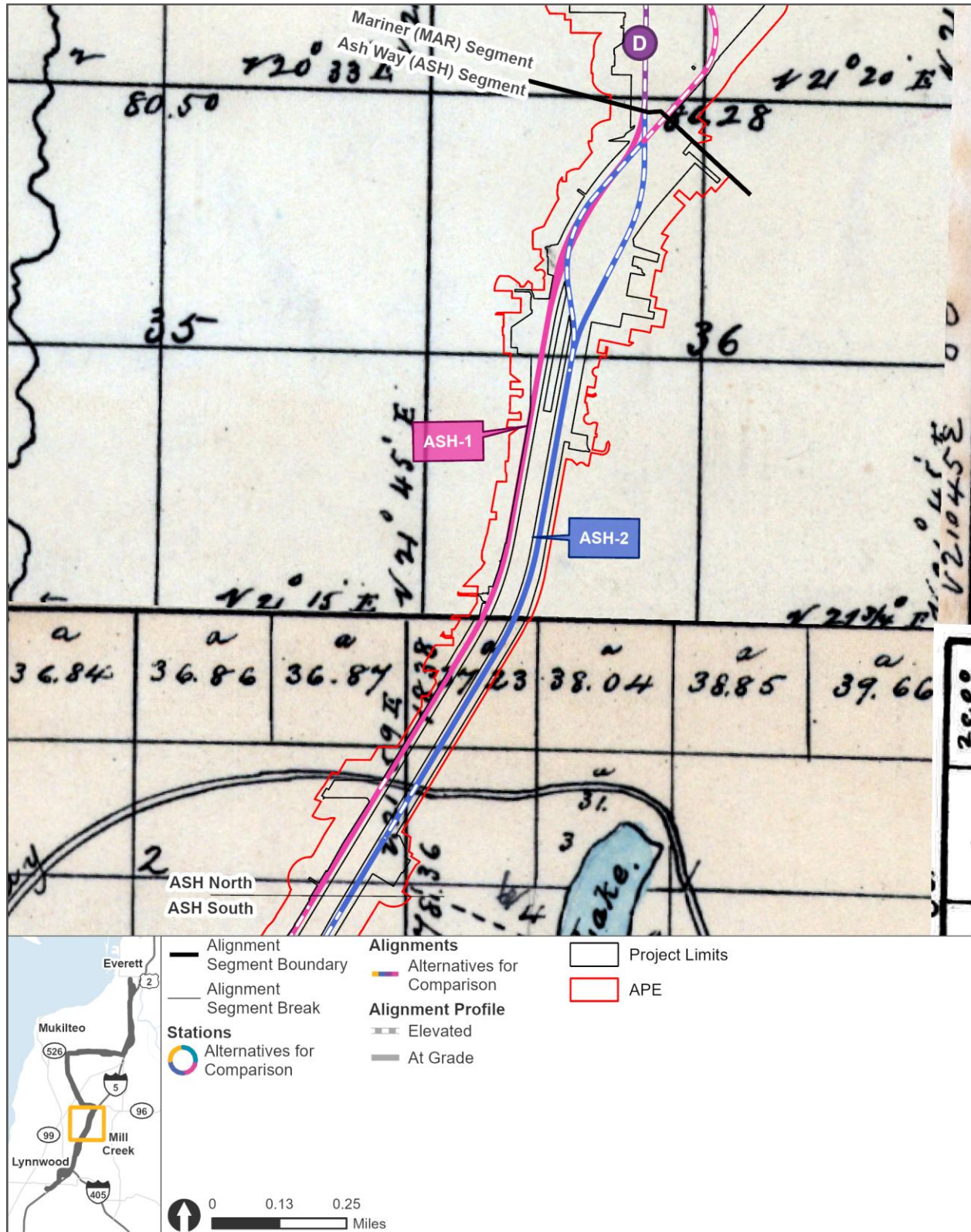


Figure F2-7 Ash Way Segment (South) – LiDAR Imagery

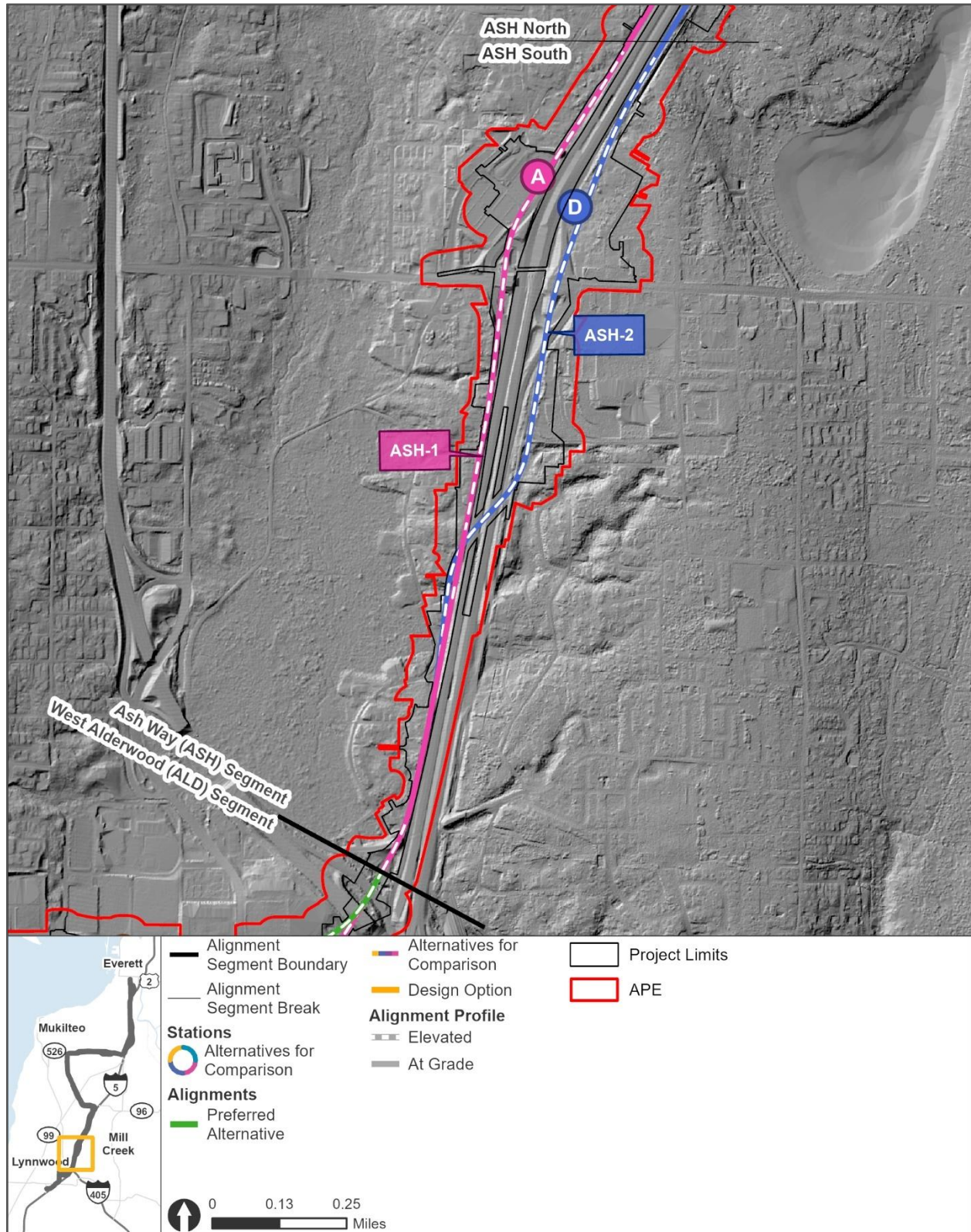
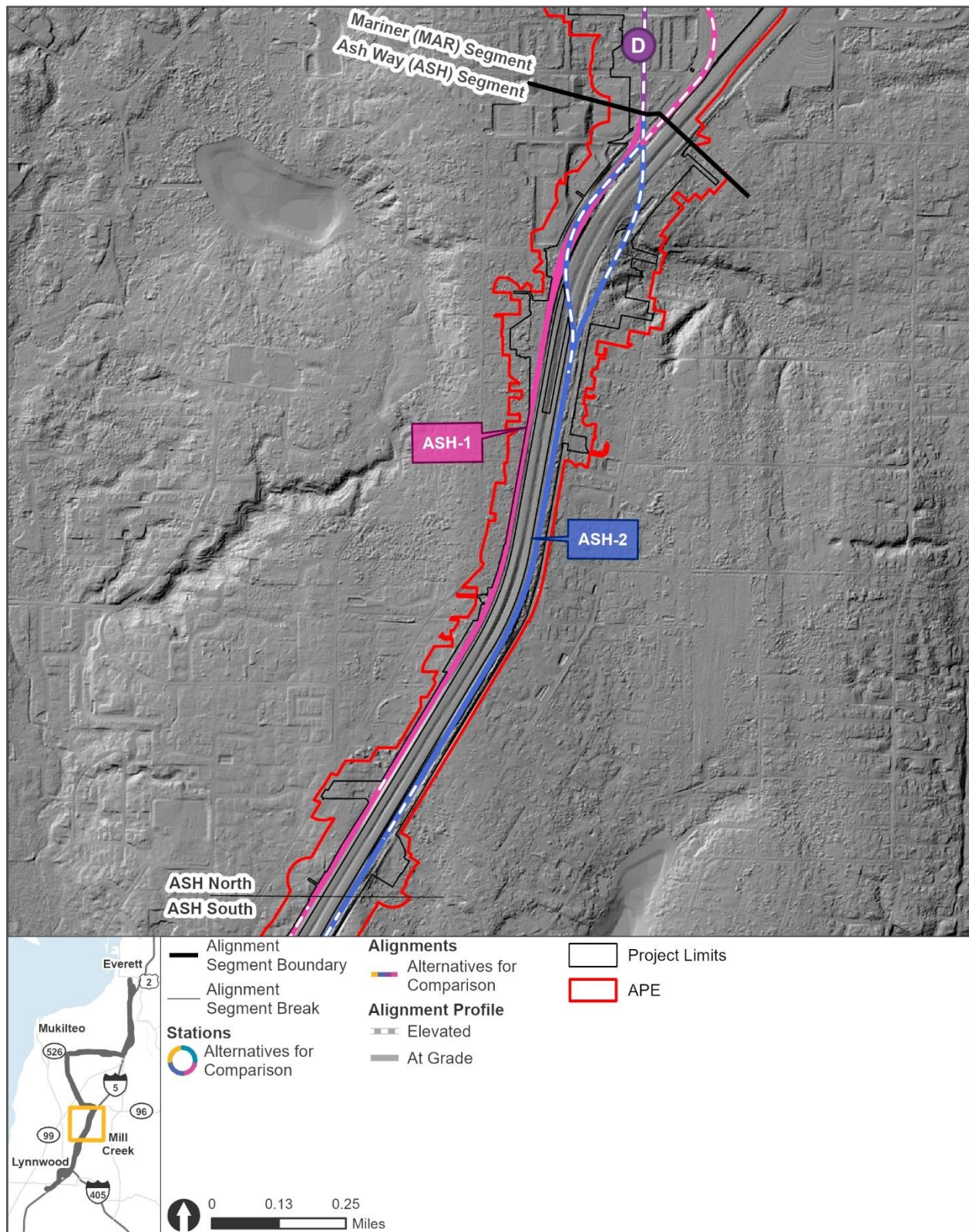


Figure F2-8 Ash Way Segment (North) – LiDAR Imagery



3 MARINER SEGMENT

Figure F3-1 Mariner Segment – 2024 Aerial Imagery

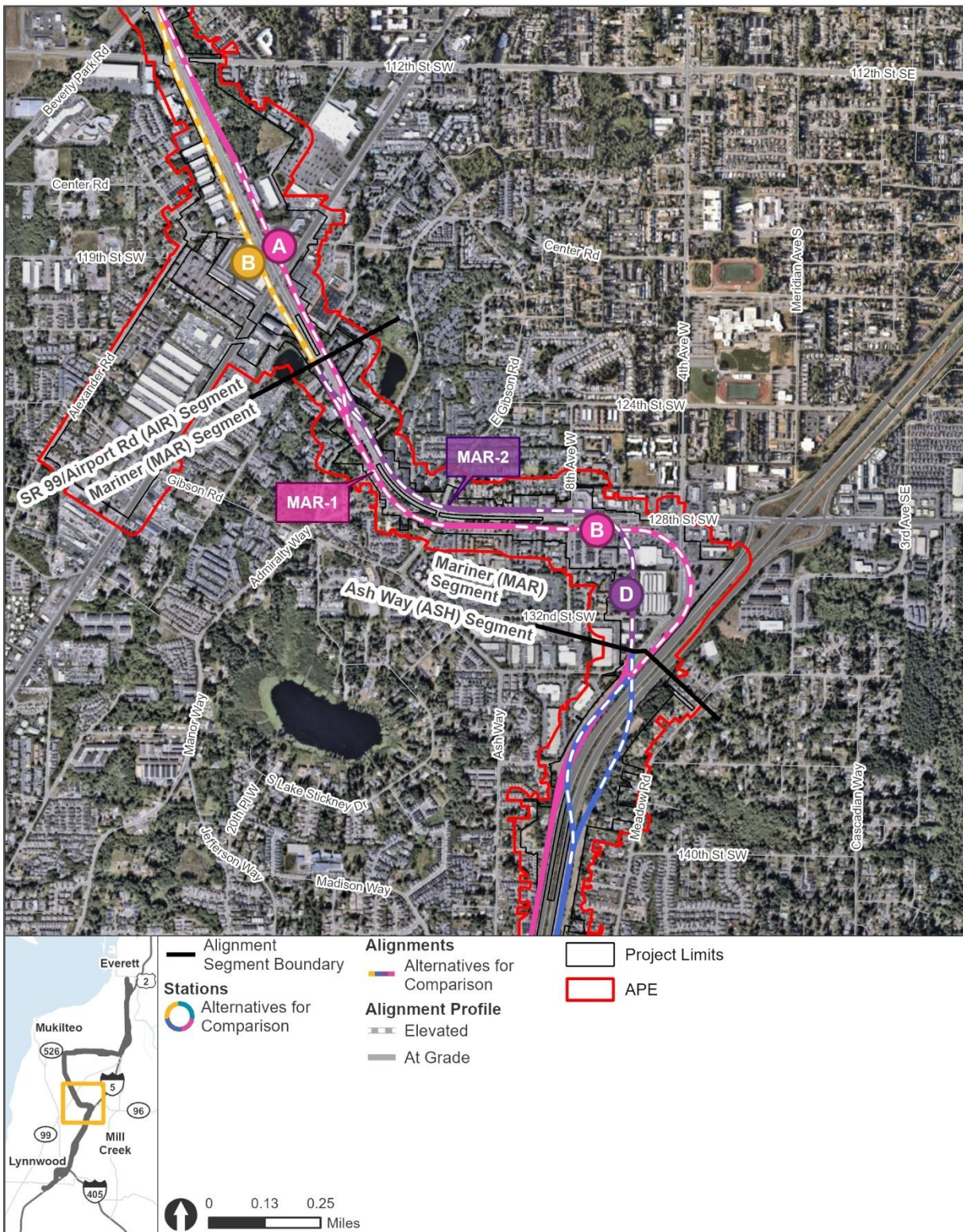


Figure F3-2 Mariner Segment – USGS Quadrangle

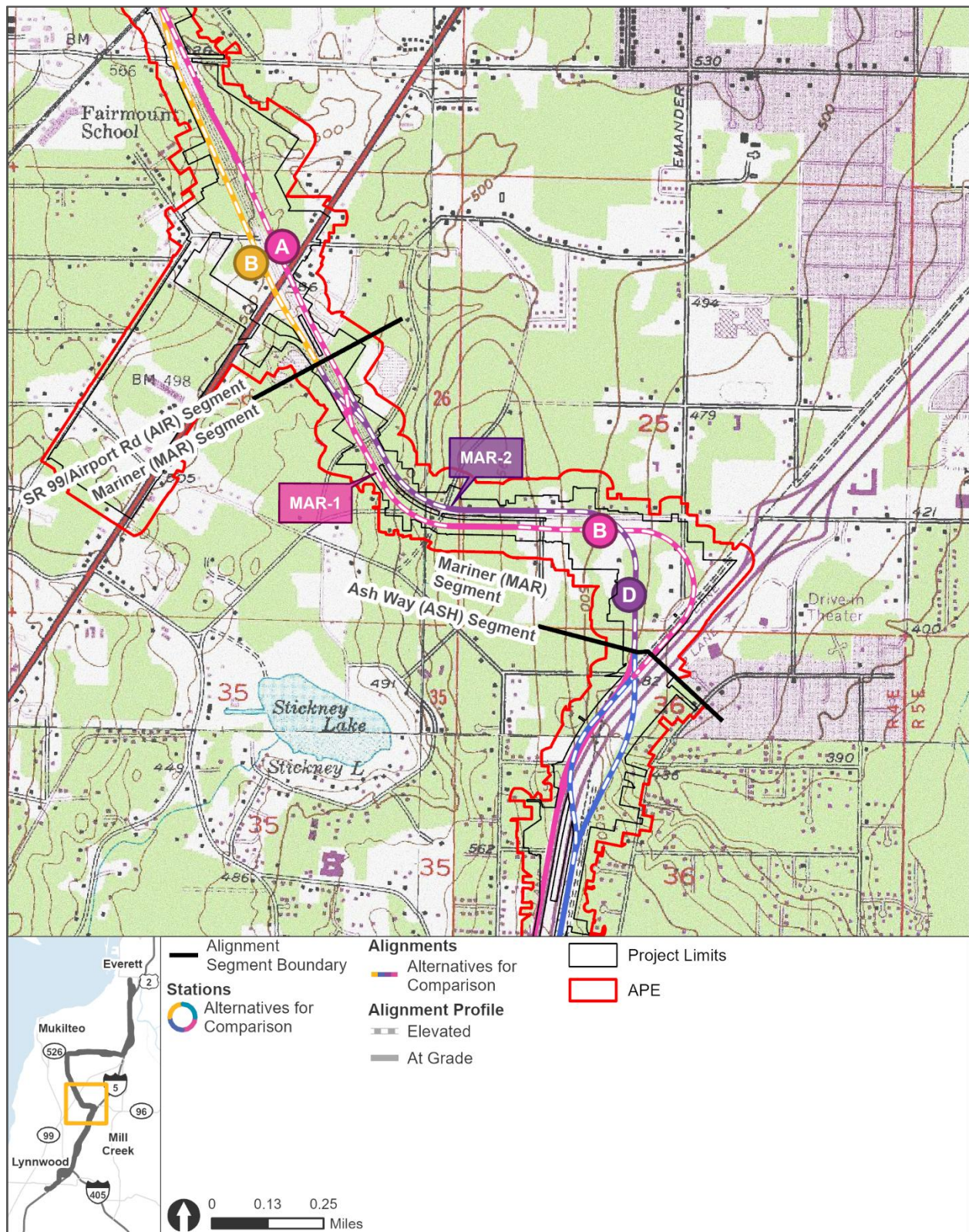


Figure F3-3 Mariner Segment – BLM GLO Plat

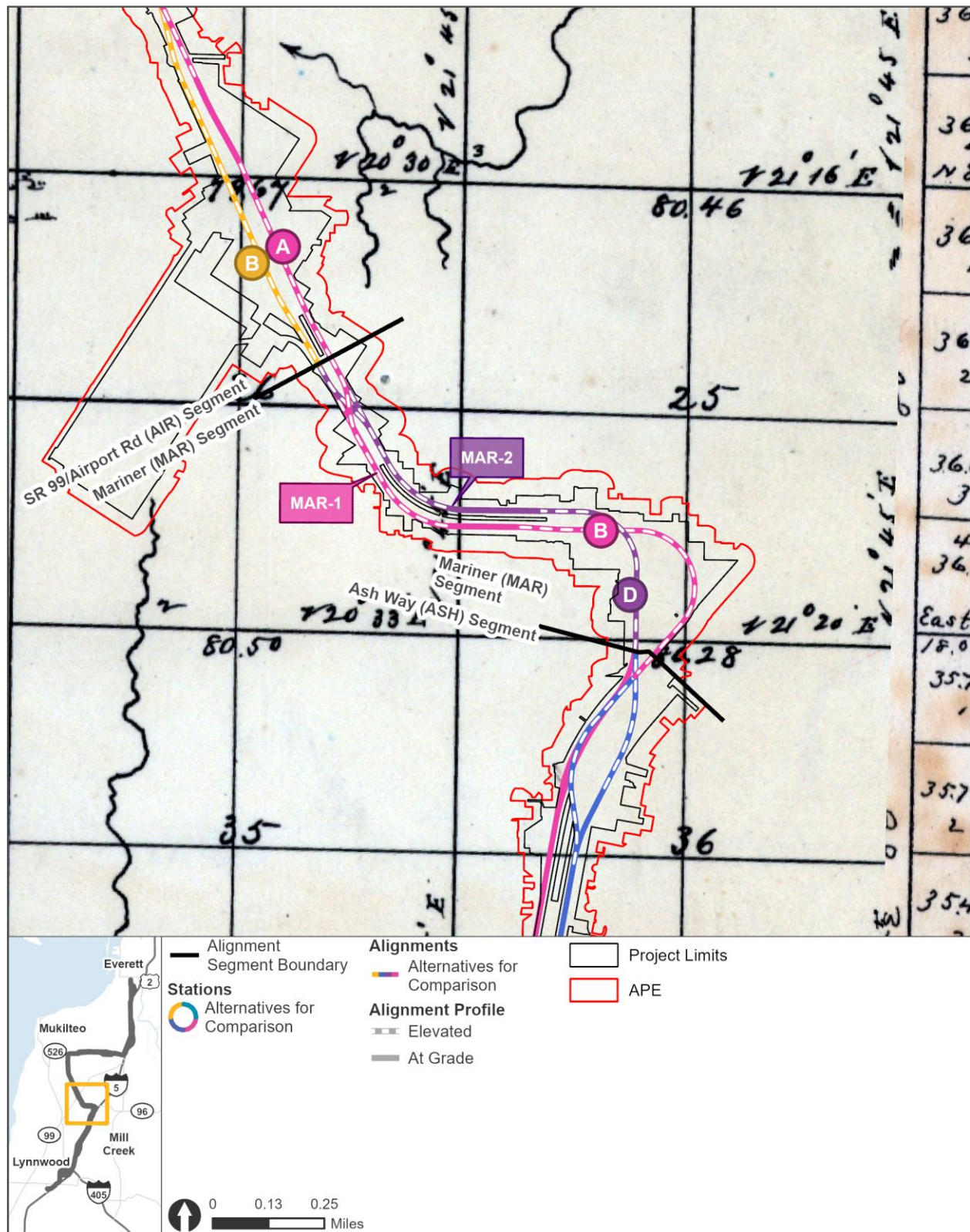
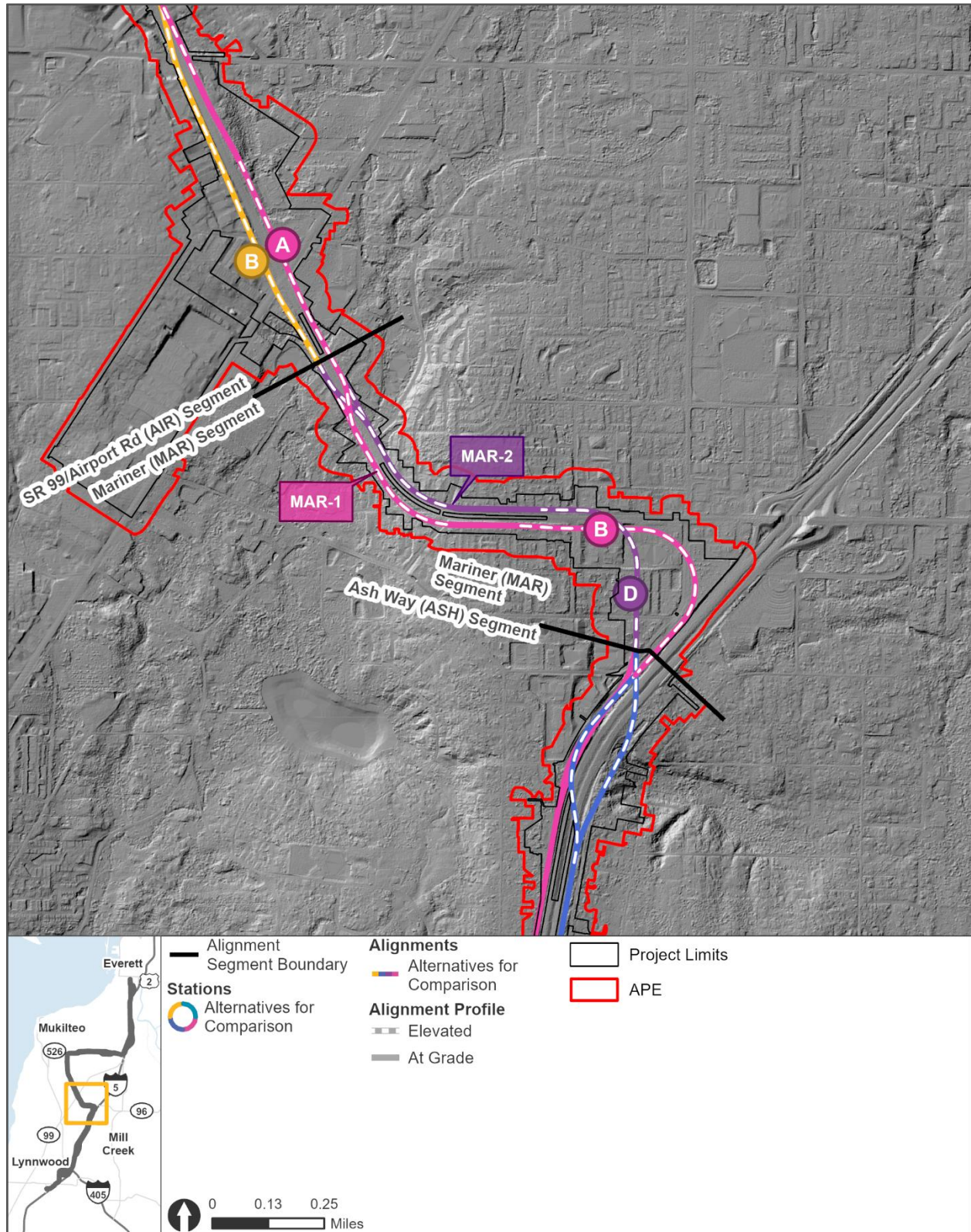


Figure F3-4 Mariner Segment – LiDAR Imagery



4 SR 99/AIRPORT ROAD SEGMENT

Figure F4-1 SR 99/Airport Road Segment – 2024 Aerial Imagery

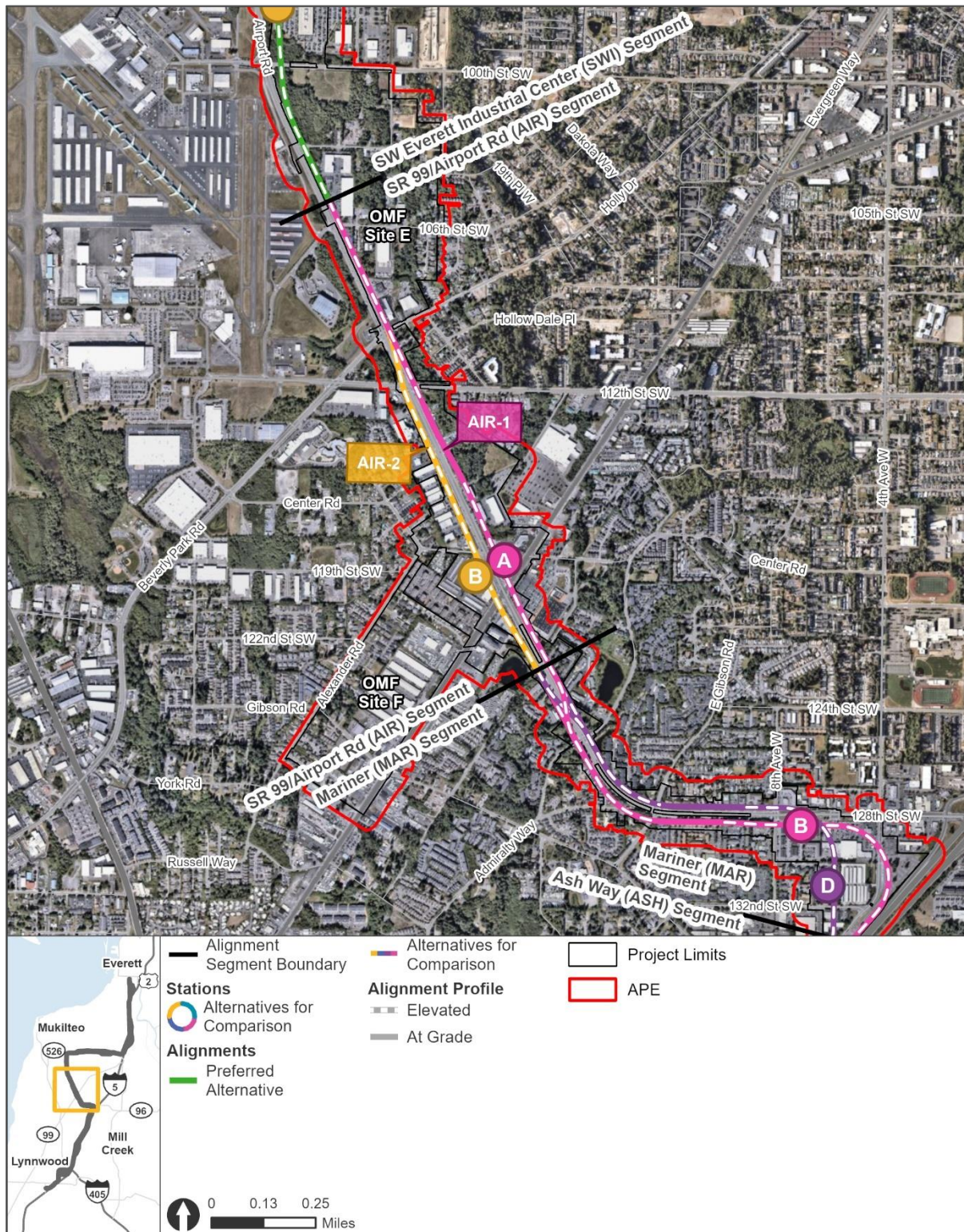


Figure F4-2 SR 99/Airport Road Segment – USGS Quadrangle

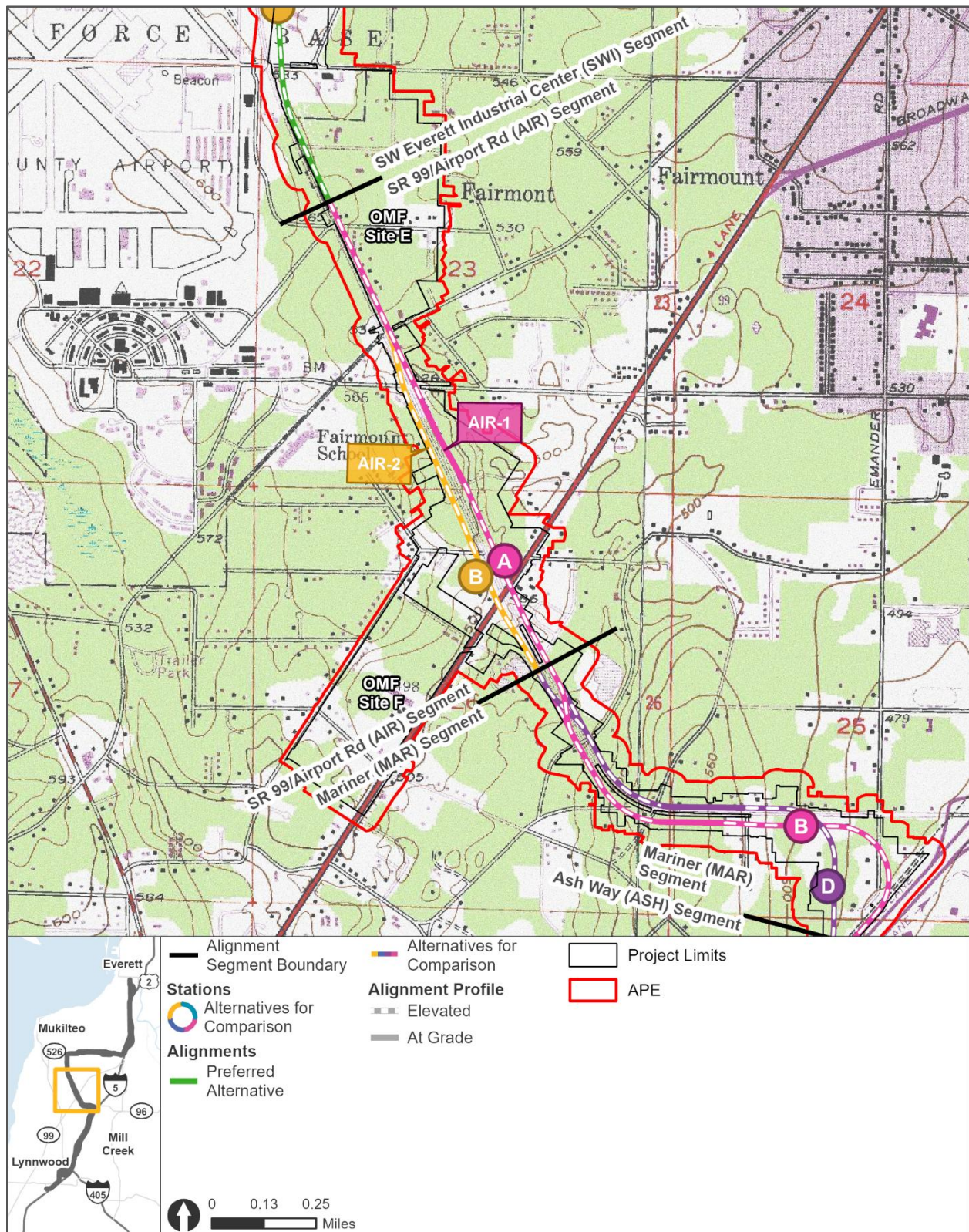


Figure F4-3 SR 99/Airport Road Segment – BLM GLO Plat

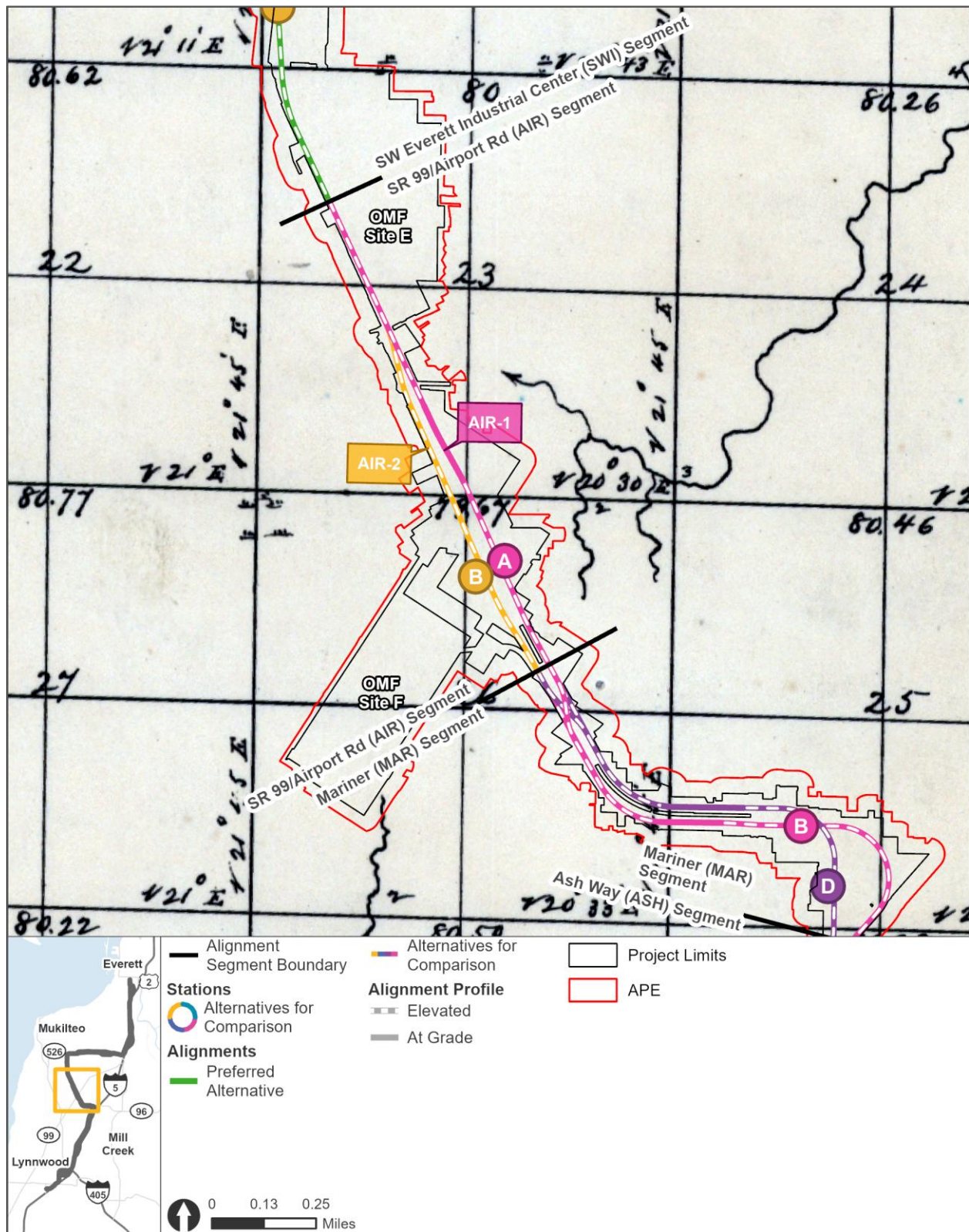
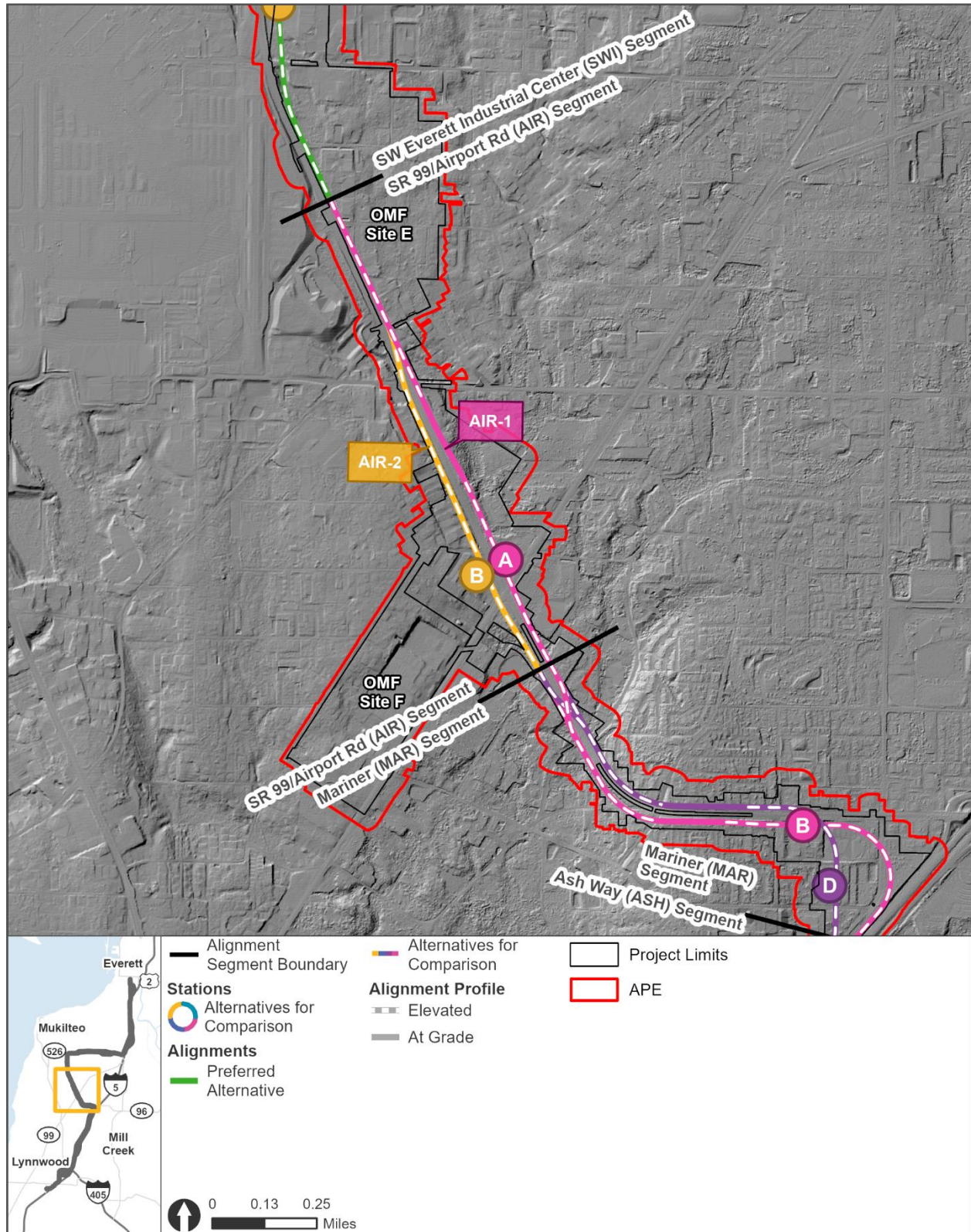


Figure F4-4 SR 99/Airport Road Segment – LiDAR Imagery



5 SW EVERETT INDUSTRIAL CENTER SEGMENT

Figure F5-1 SW Everett Industrial Center Segment – 2024 Aerial Imagery



Figure F5-2 SW Everett Industrial Center Segment – USGS Quadrangle

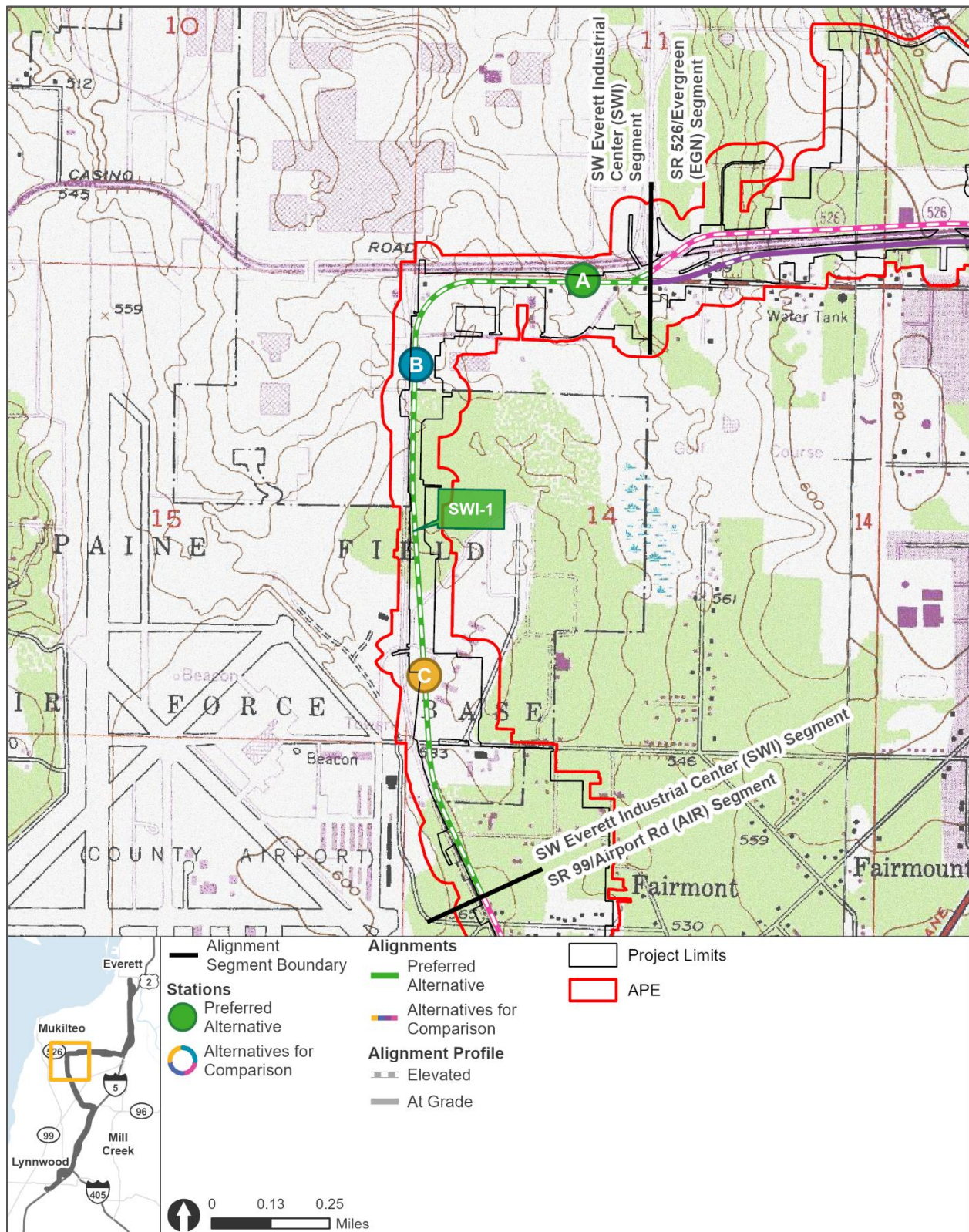


Figure F5-3 SW Everett Industrial Center Segment – BLM GLO Plat

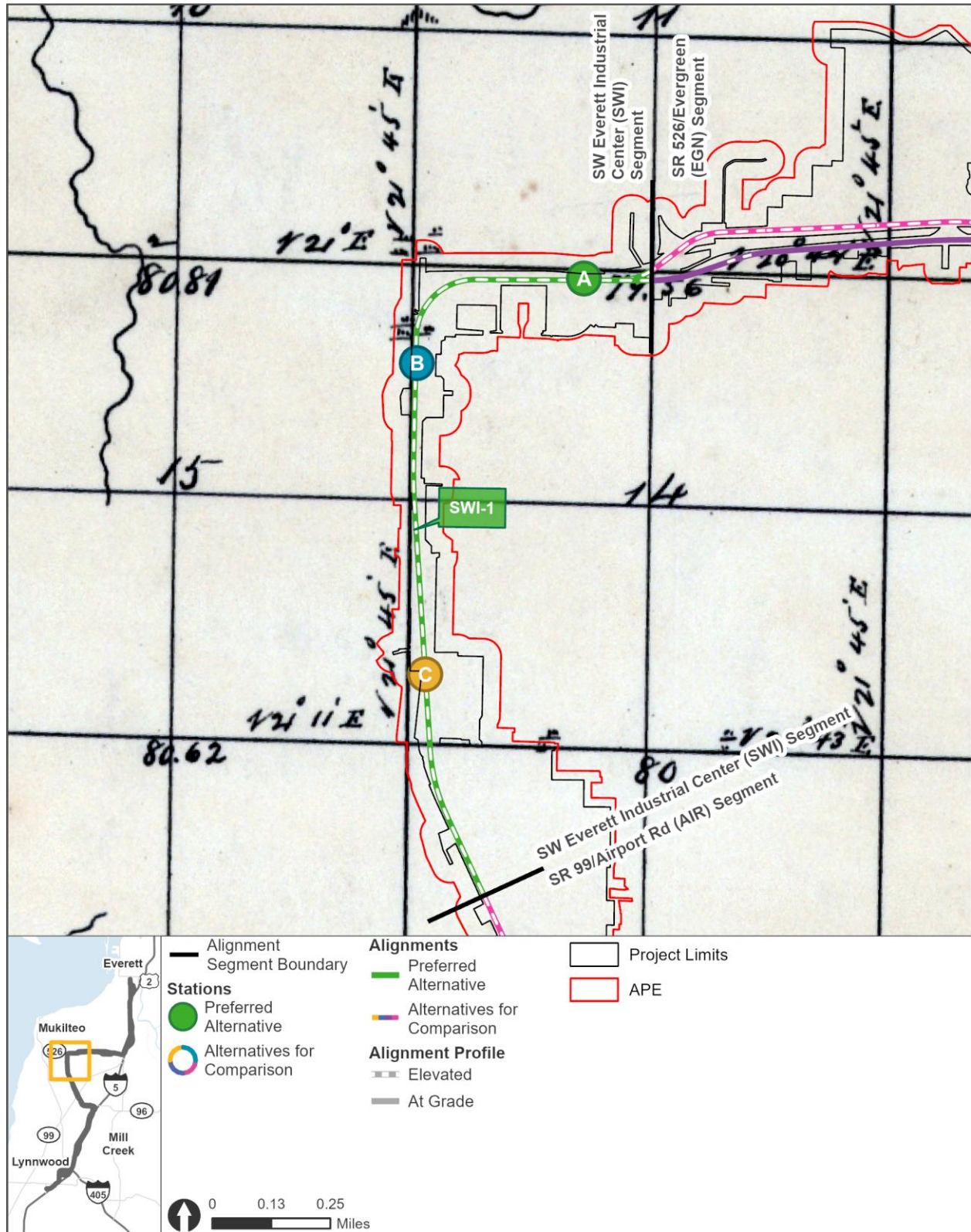
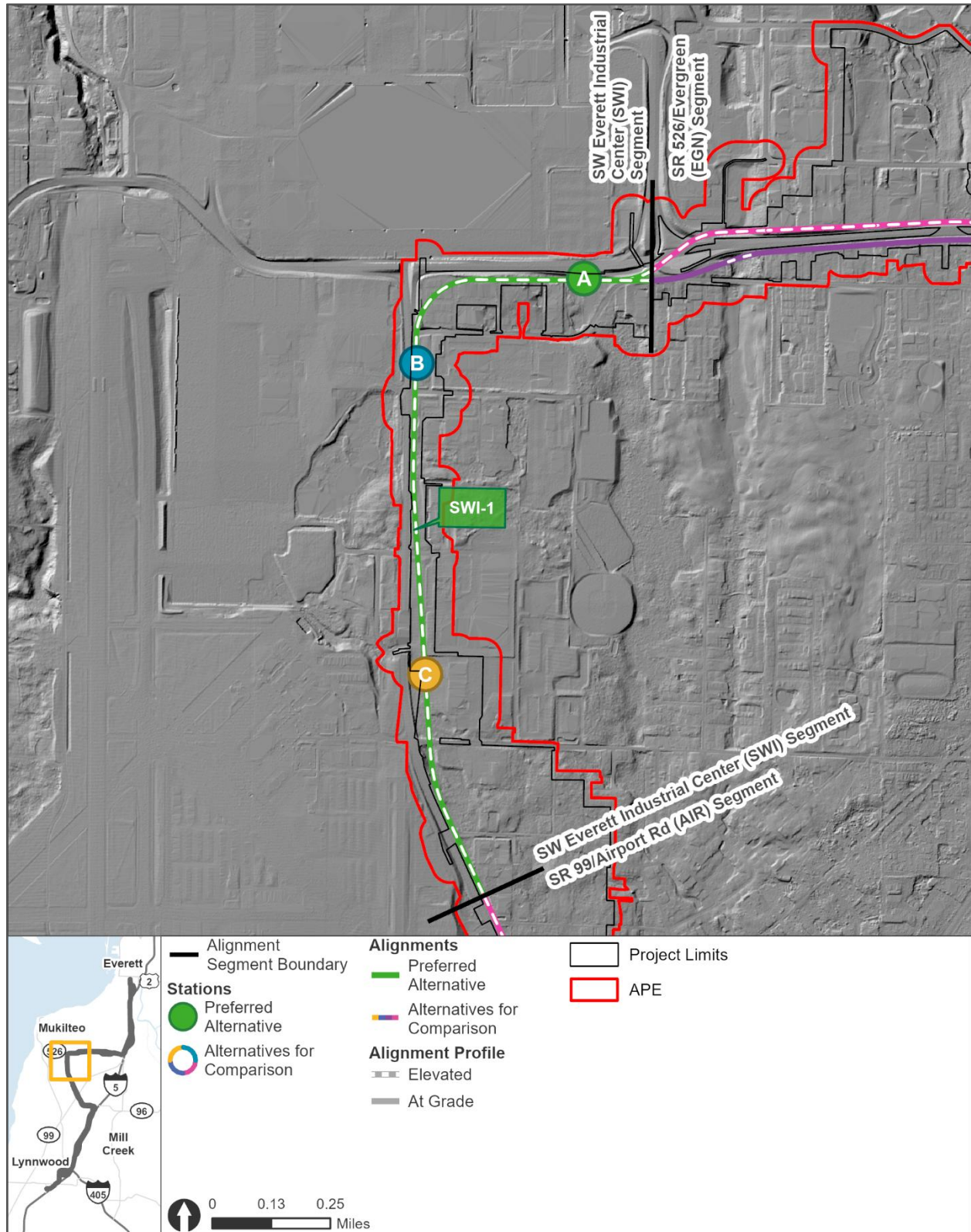


Figure F5-4 SW Everett Industrial Center Segment – LiDAR Imagery



6 SR 526/EVERGREEN SEGMENT

Figure F6-1 SR 526/Evergreen Segment (West) – 2024 Aerial Imagery



Figure F6-2 SR 526/Evergreen Segment (East) – 2024 Aerial Imagery

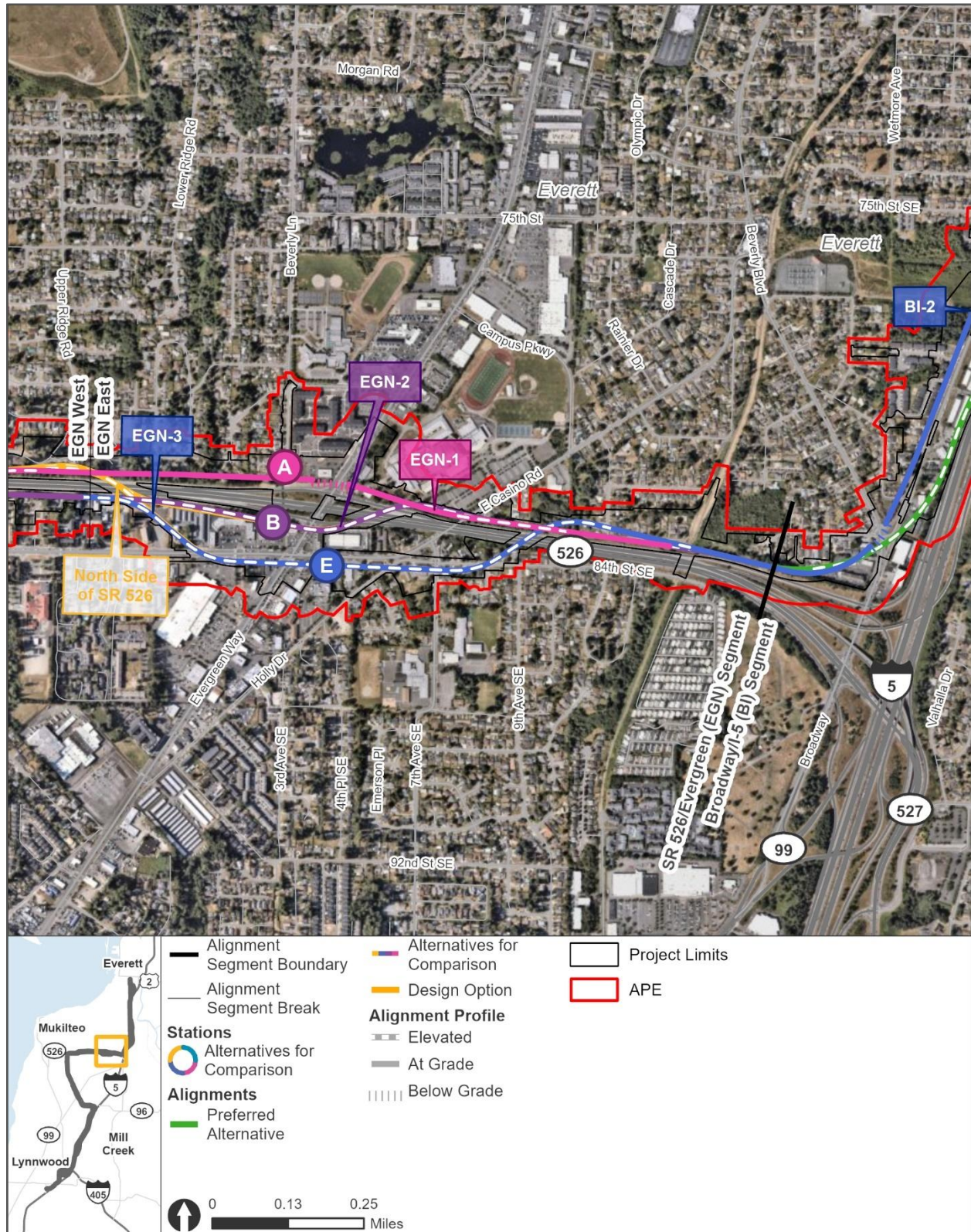


Figure F6-3 SR 526/Evergreen Segment (West) – USGS Quadrangle

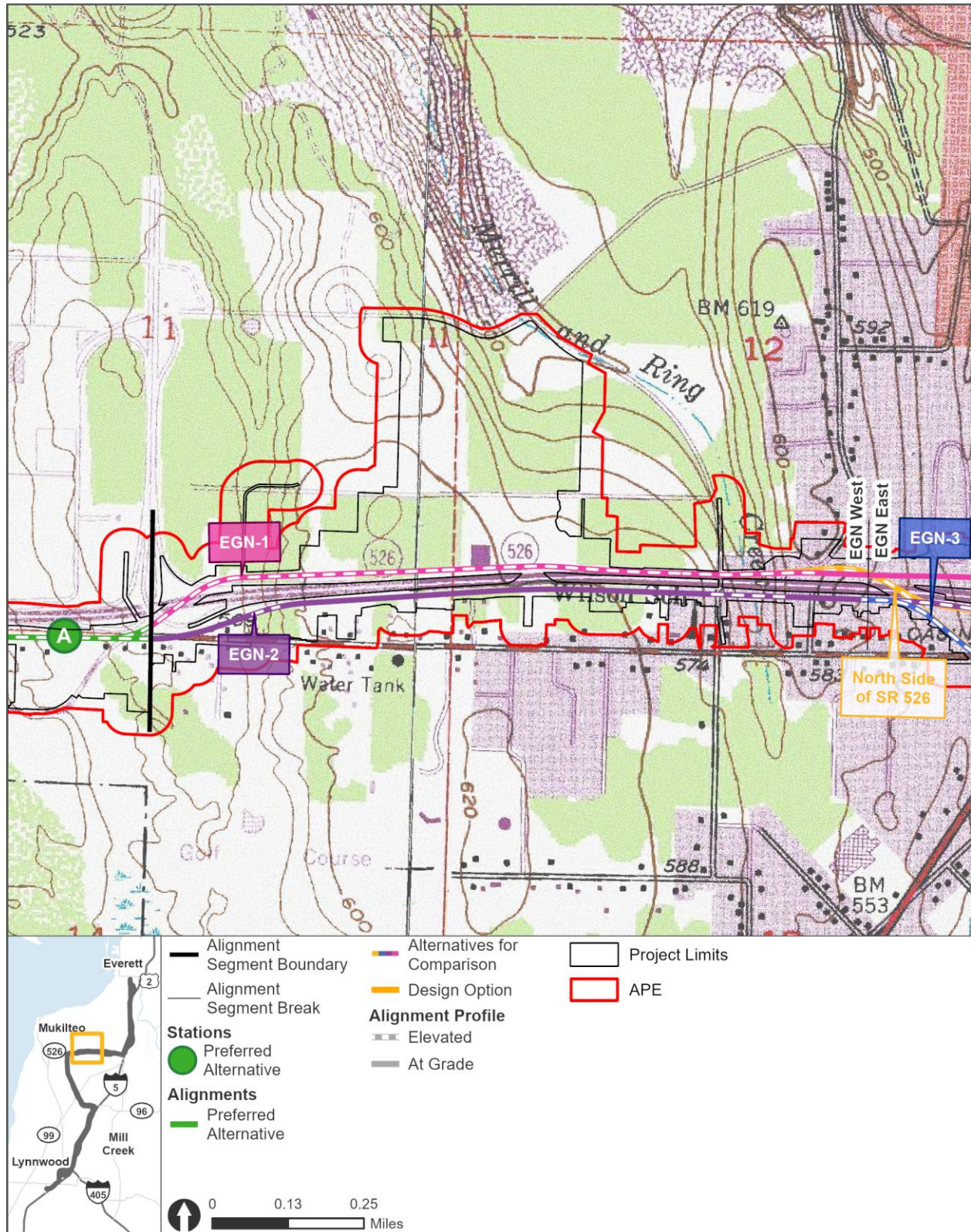


Figure F6-4 SR 526/Evergreen Segment (East) – USGS Quadrangle

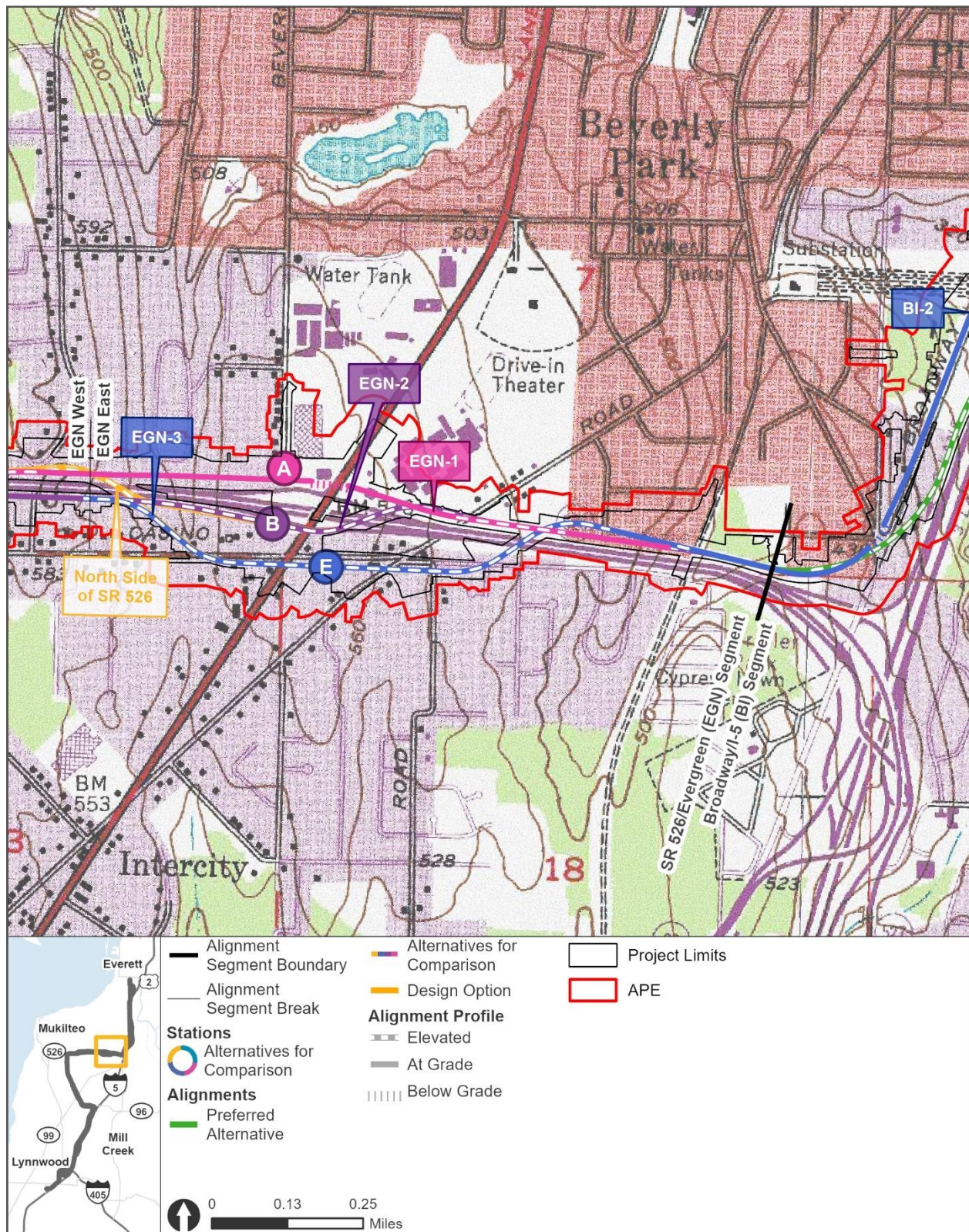


Figure F6-5 SR 526/Evergreen Segment (West) – BLM GLO Plat

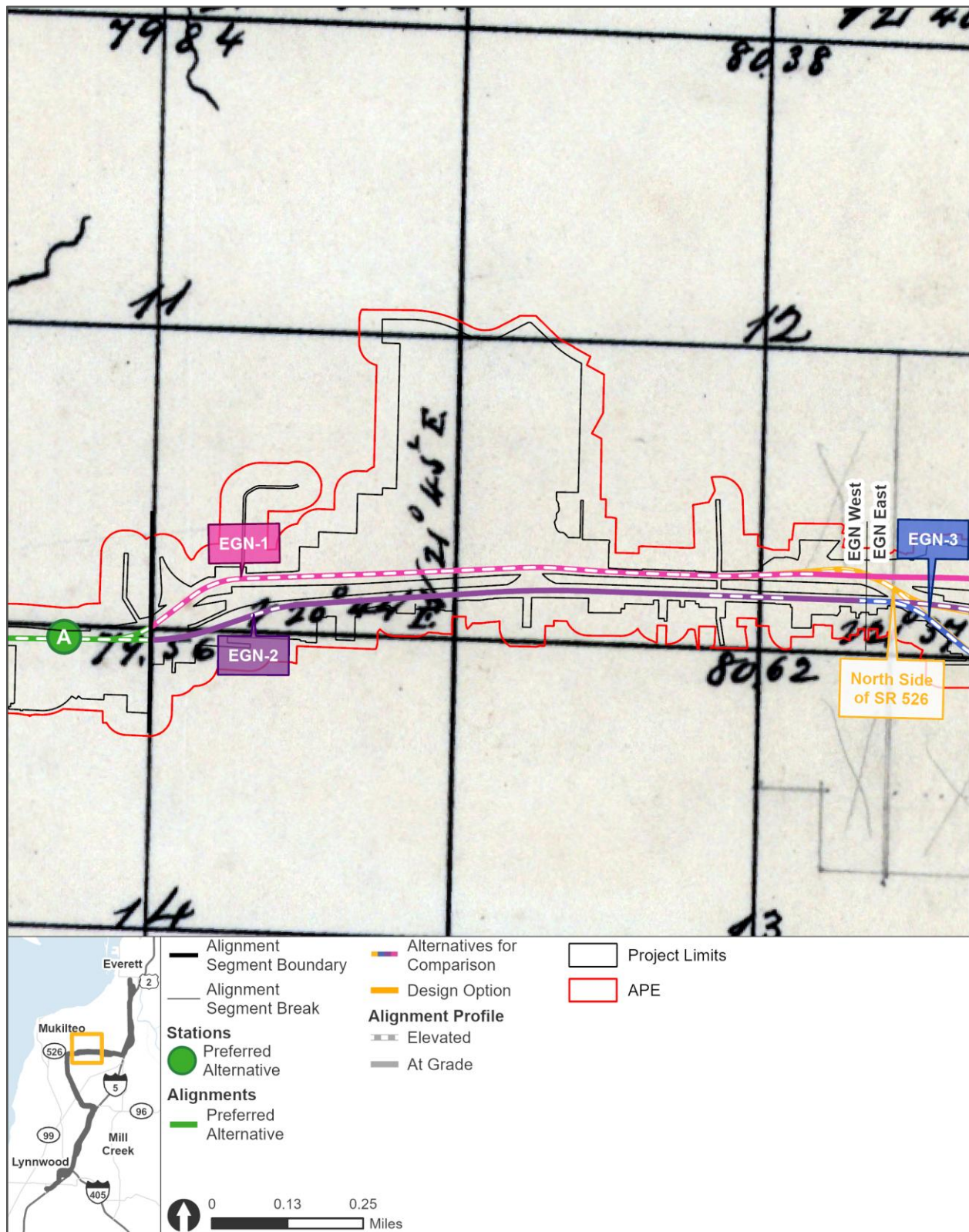


Figure F6-7 SR 526/Evergreen Segment (West) – LiDAR Imagery

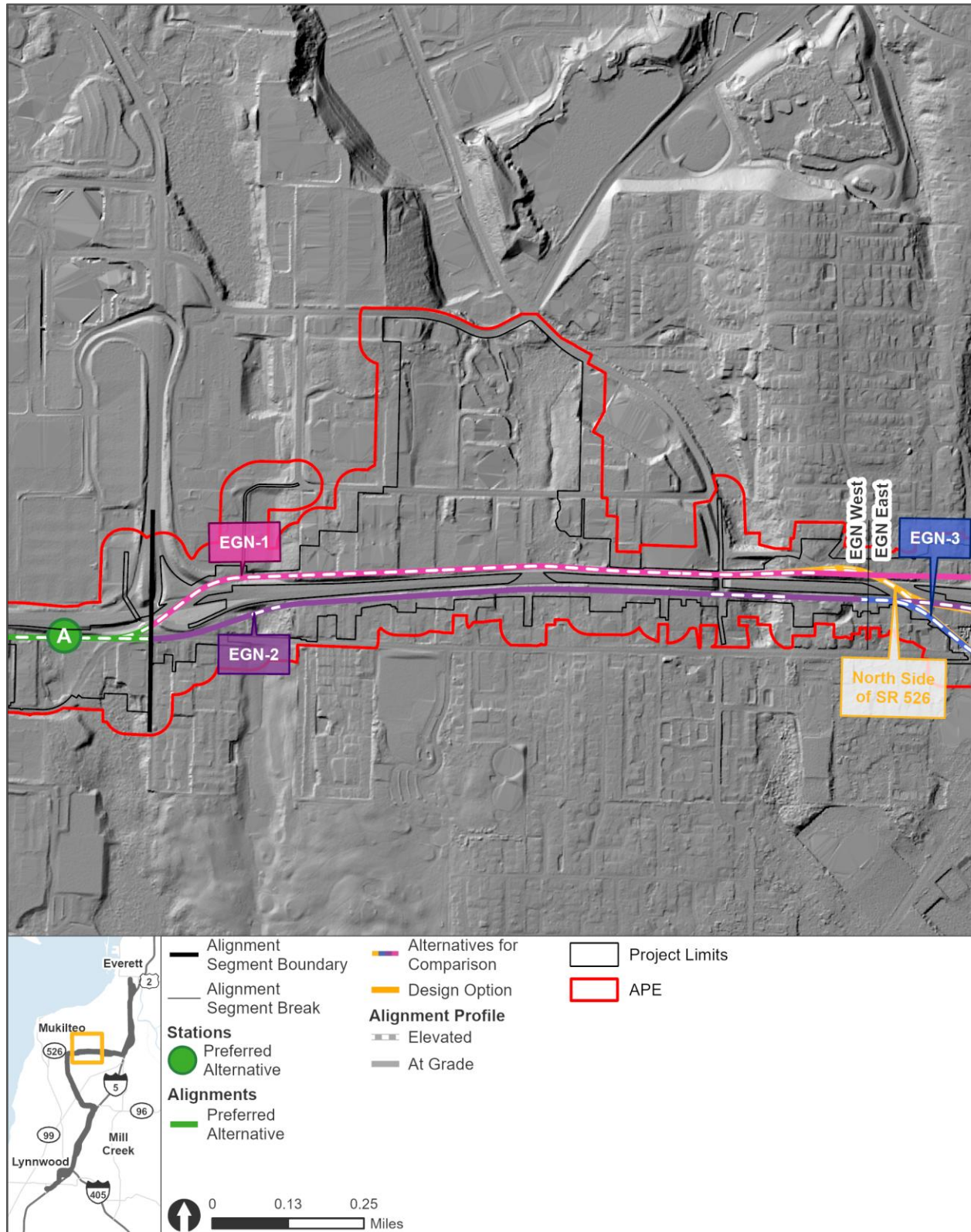
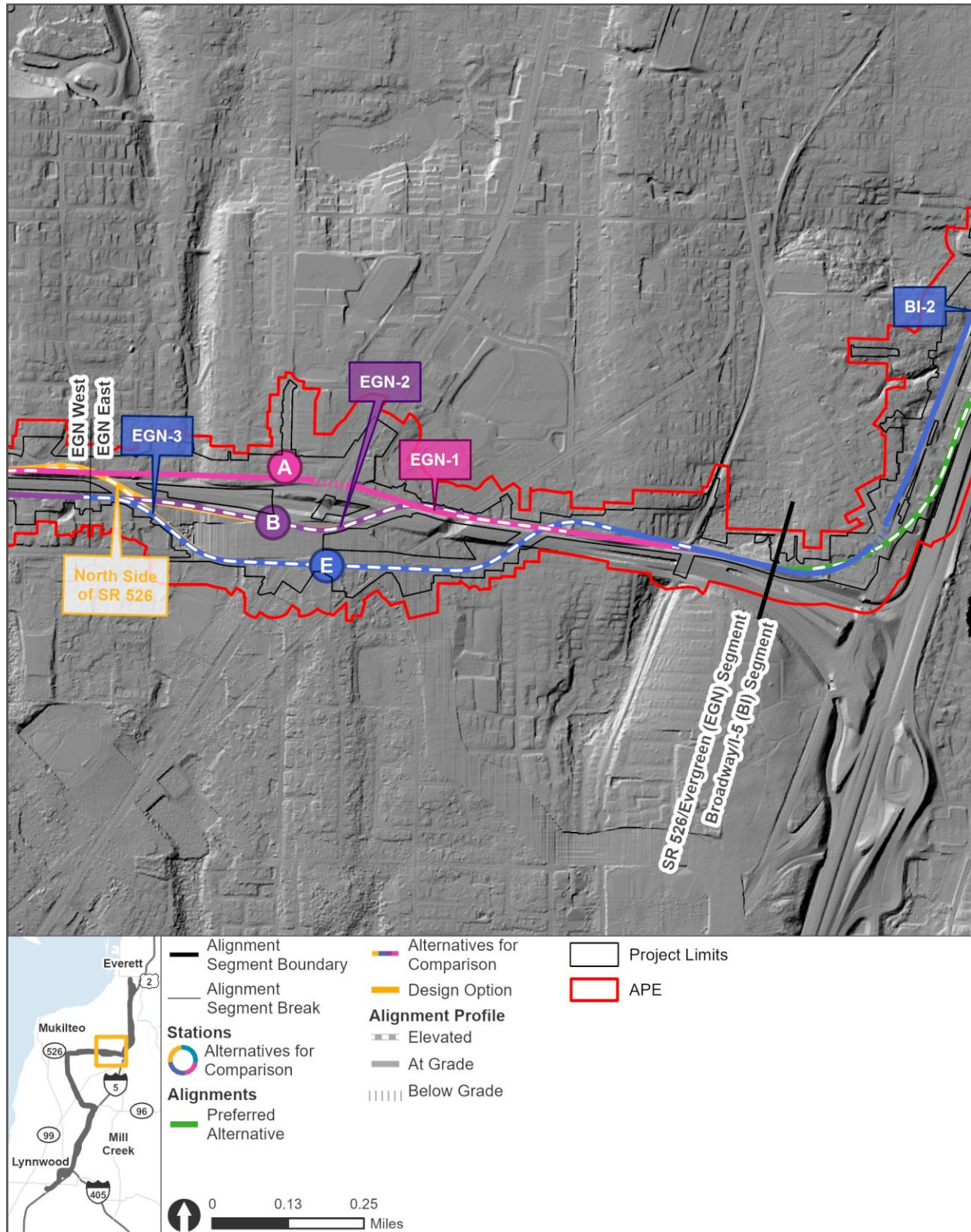


Figure F6-8 SR 526/Evergreen Segment (East) – LiDAR Imagery



7 BROADWAY/I-5 SEGMENT

Figure F7-1 Broadway/I-5 Segment (South) – 2024 Aerial Imagery

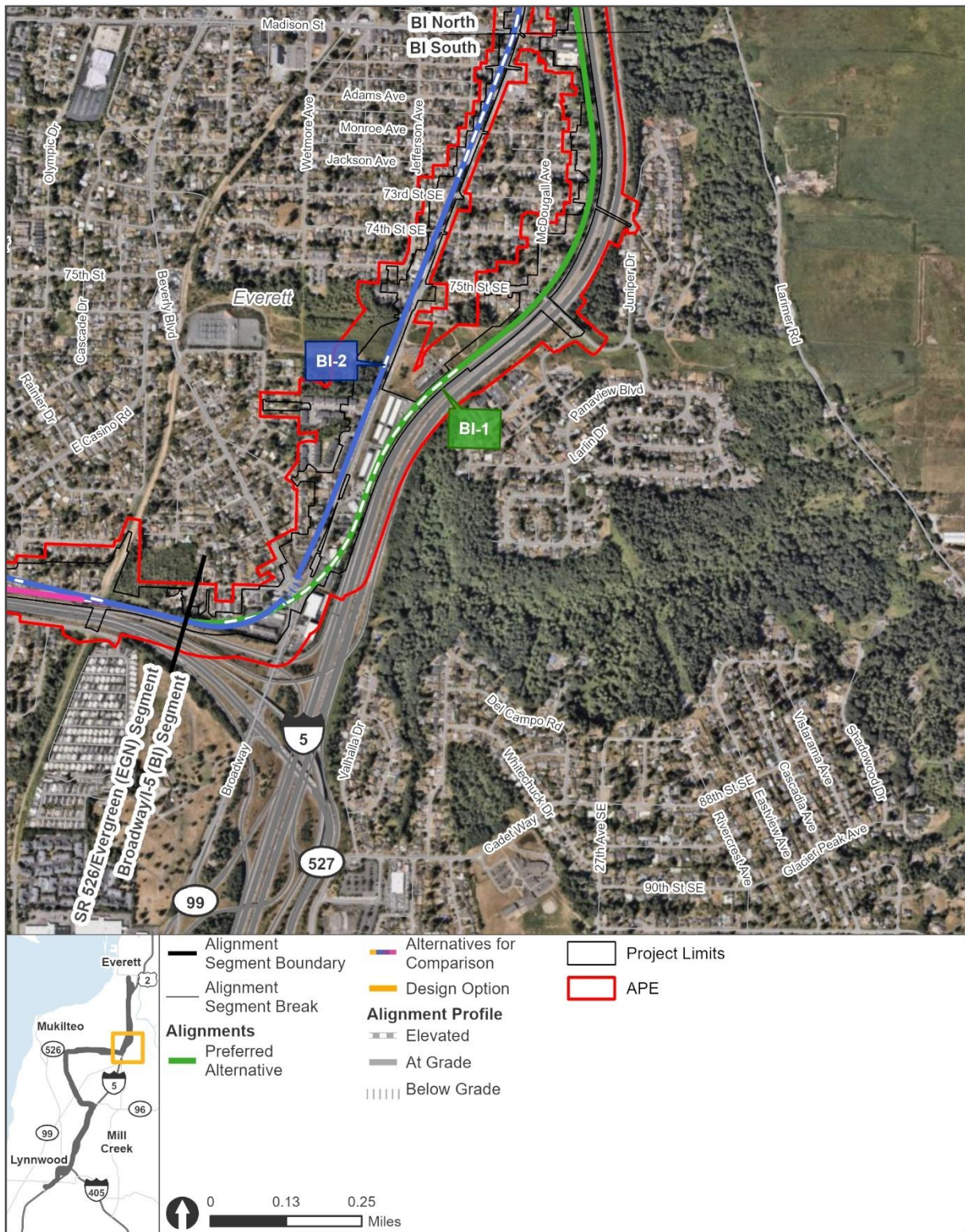


Figure F7-2 Broadway/I-5 Segment (North) – 2024 Aerial Imagery

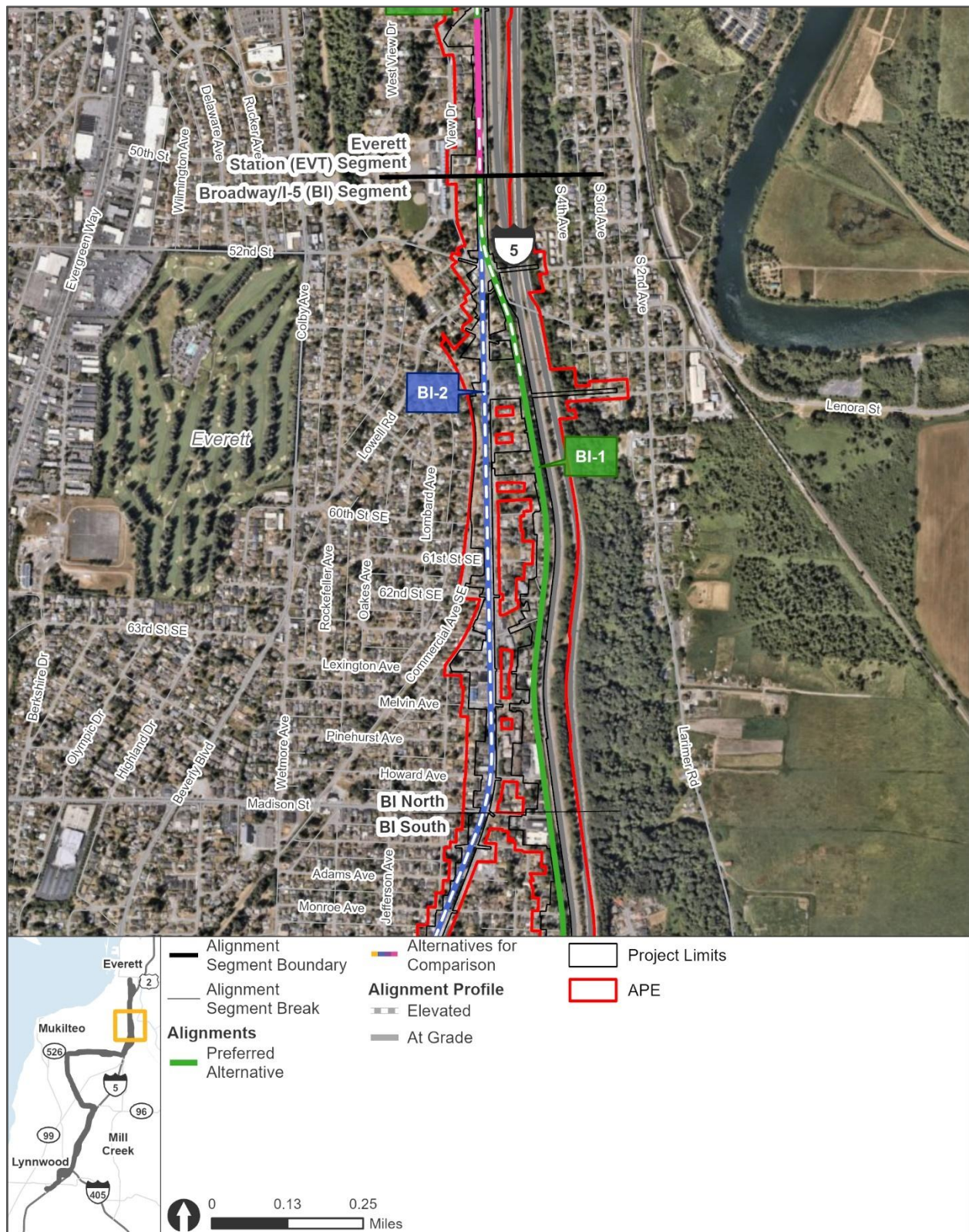


Figure F7-3 Broadway/I-5 Segment (South) – USGS Quadrangle

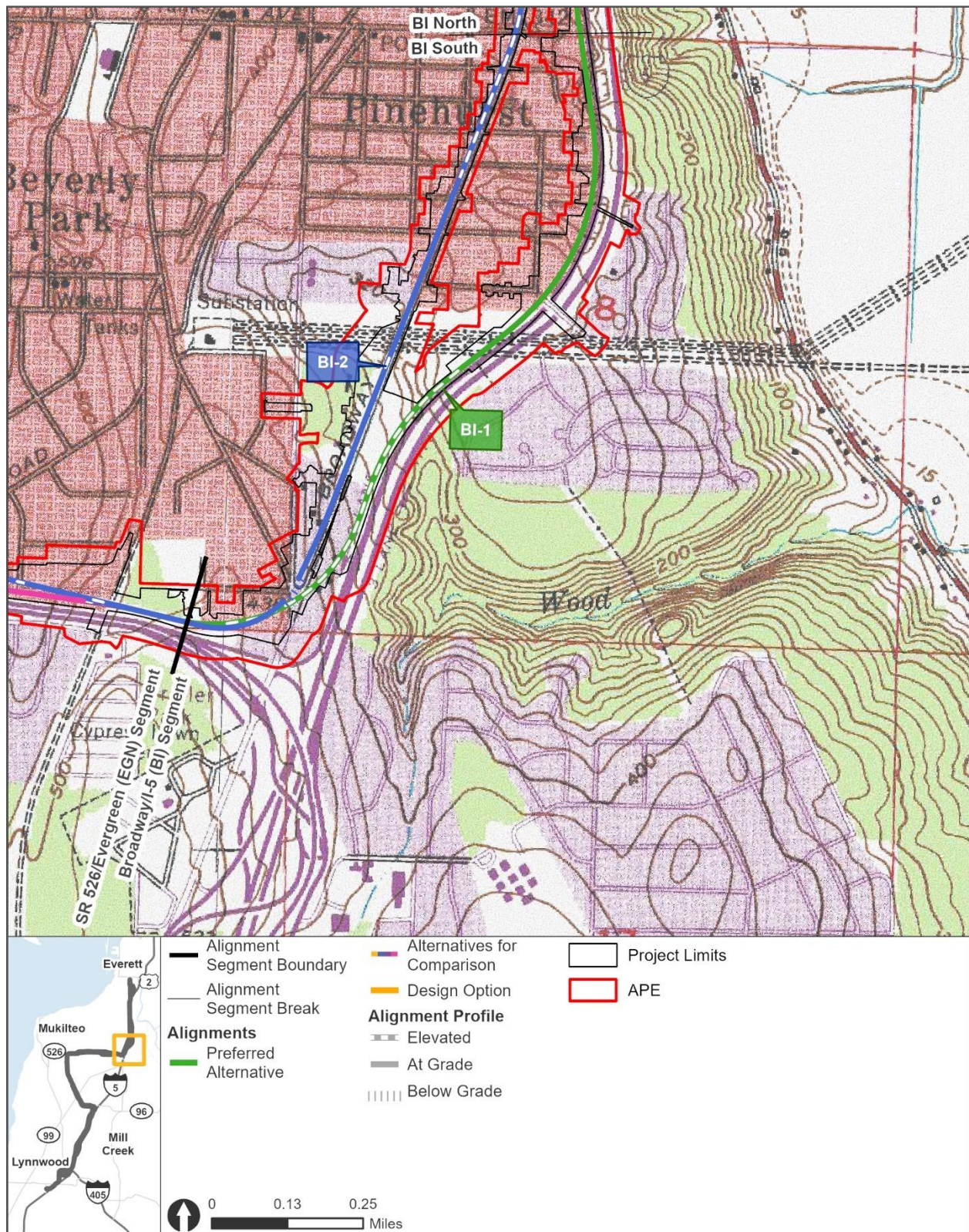


Figure F7-4 Broadway/I-5 Segment (North) – USGS Quadrangle

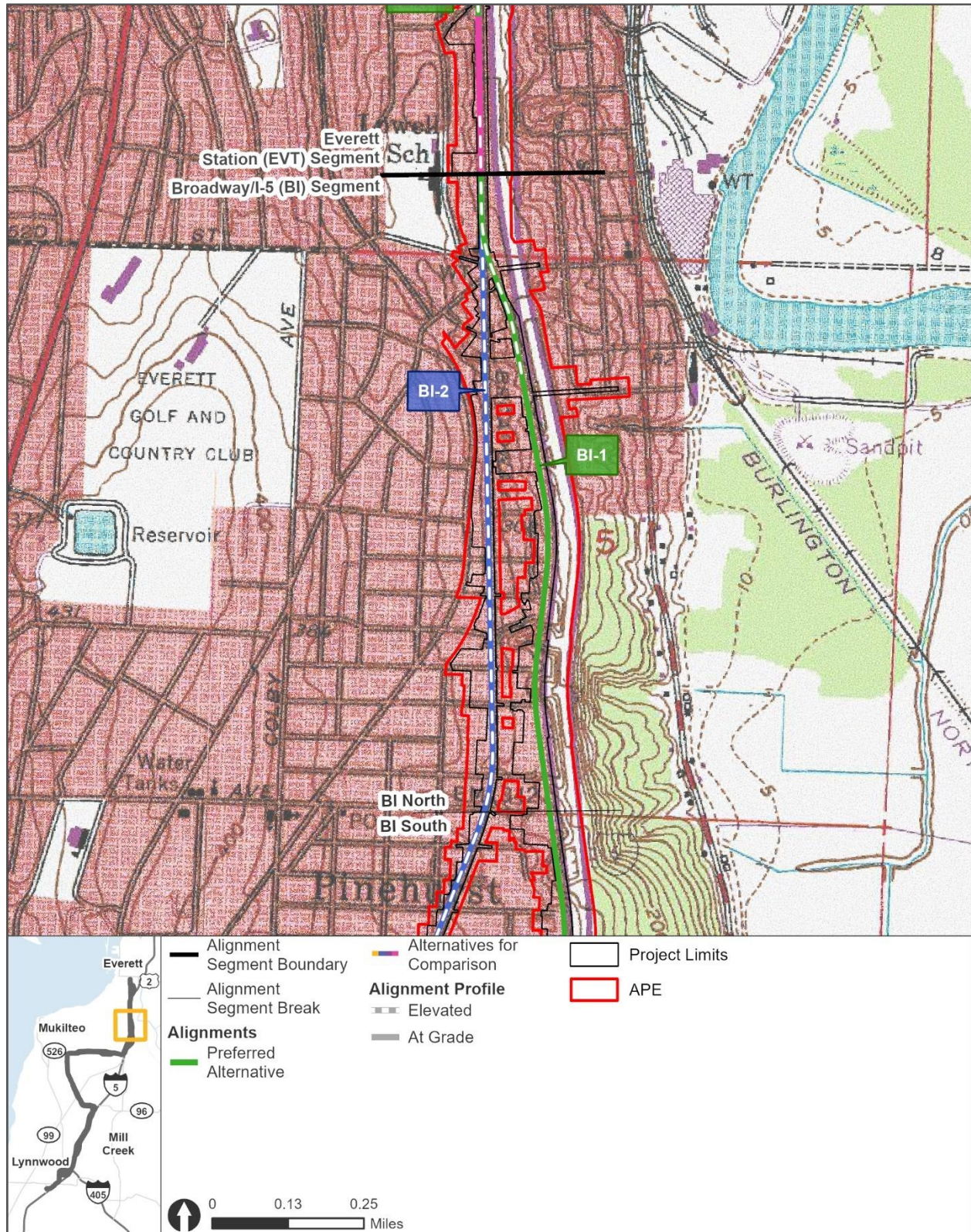


Figure F7-5 Broadway/I-5 Segment (South) – BLM GLO Plat

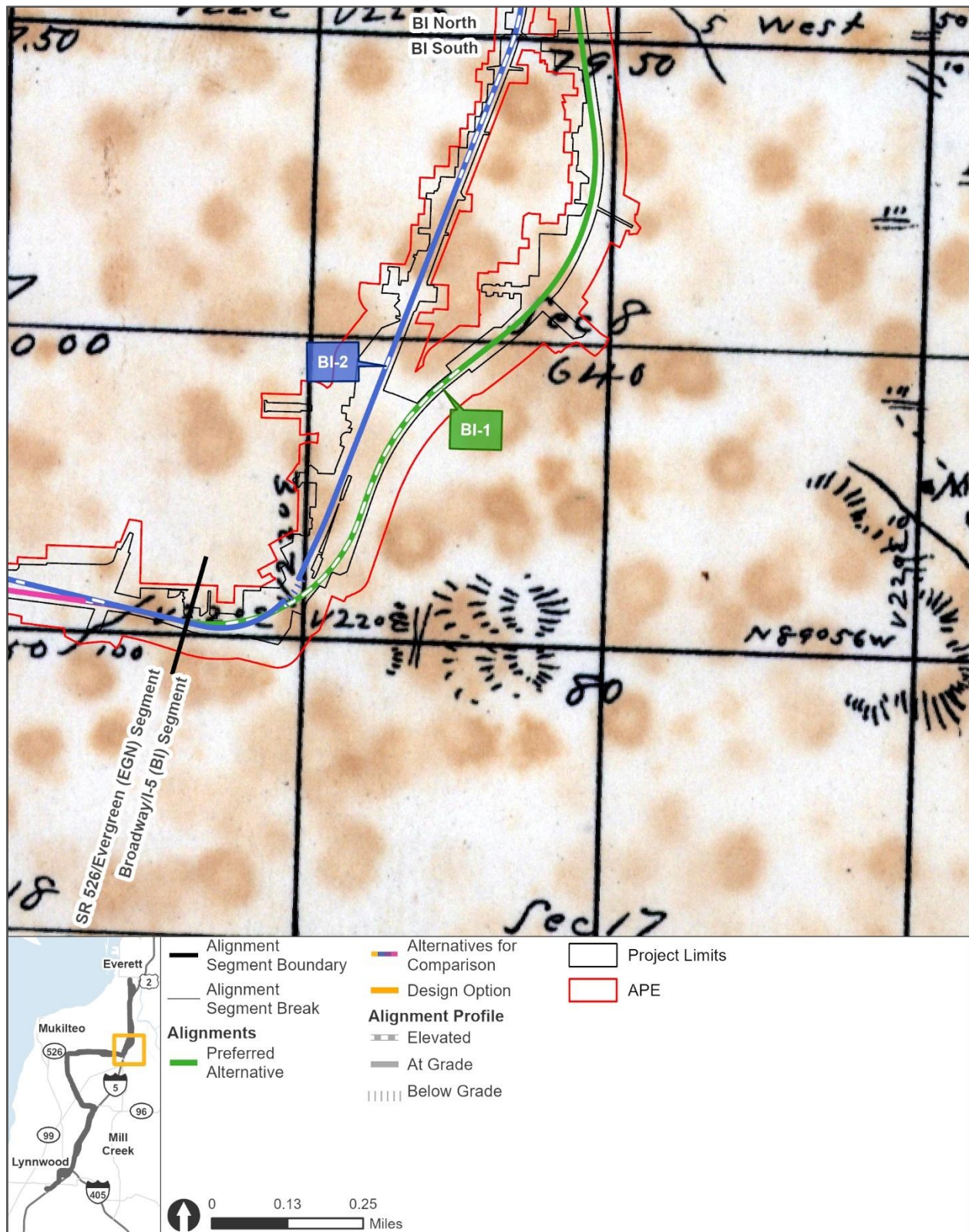


Figure F7-6 Broadway/I-5 Segment (North) – BLM GLO Plat

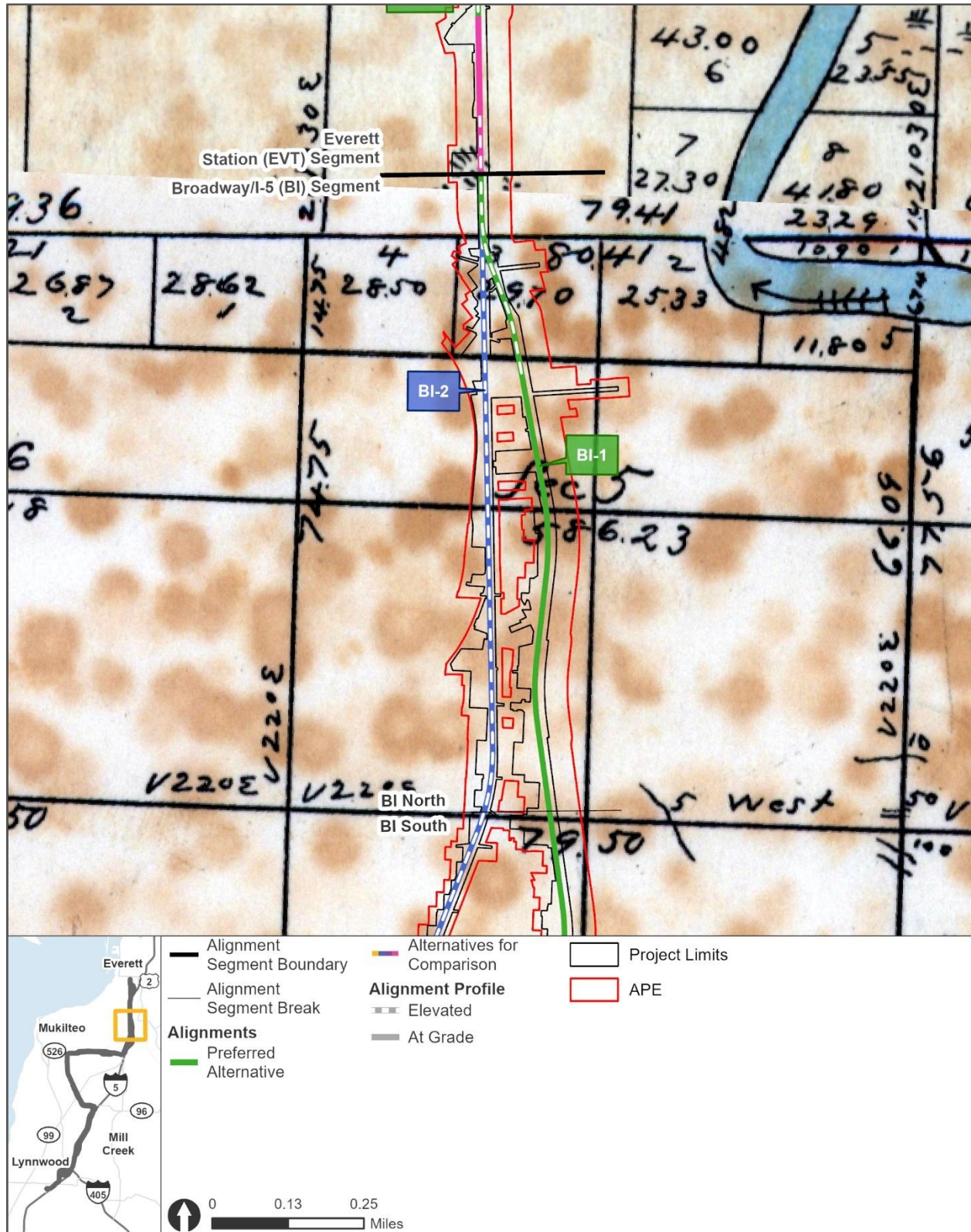


Figure F7-7 Broadway/I-5 Segment (South) – LiDAR Imagery

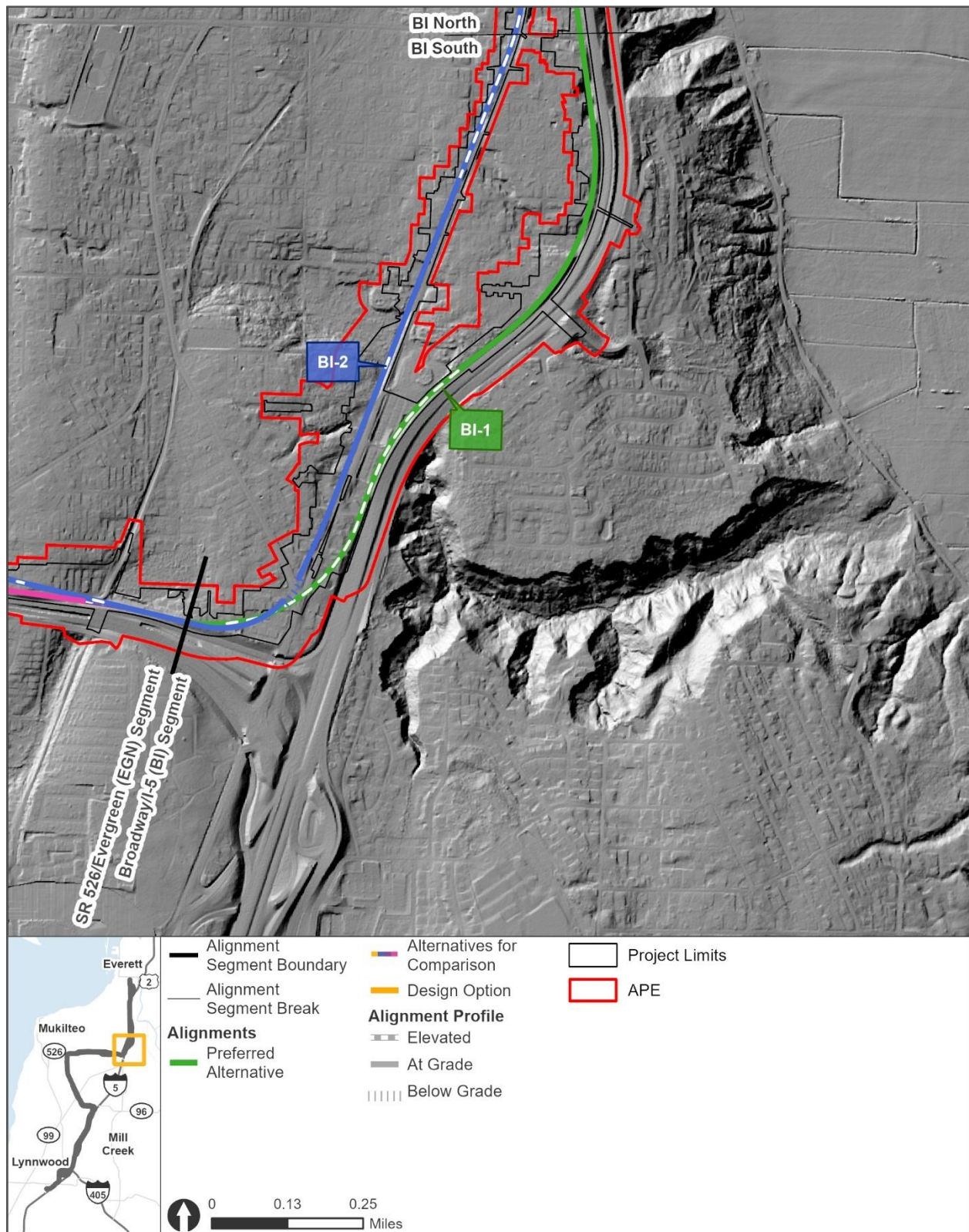
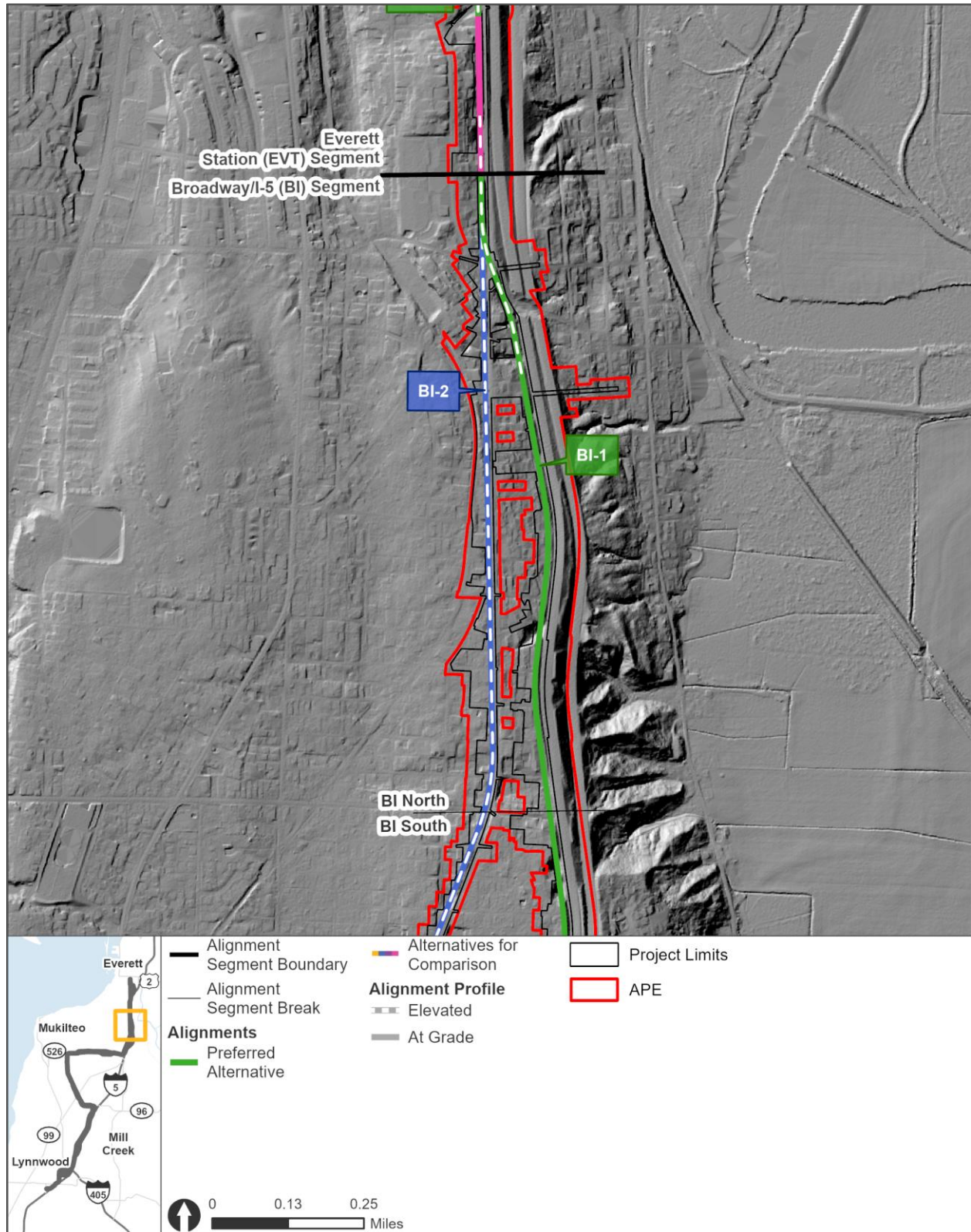


Figure F7-8 Broadway/I-5 Segment (North) – LiDAR Imagery



8 EVERETT STATION SEGMENT

Figure F8-1 Everett Station Segment (South) – 2024 Aerial Imagery

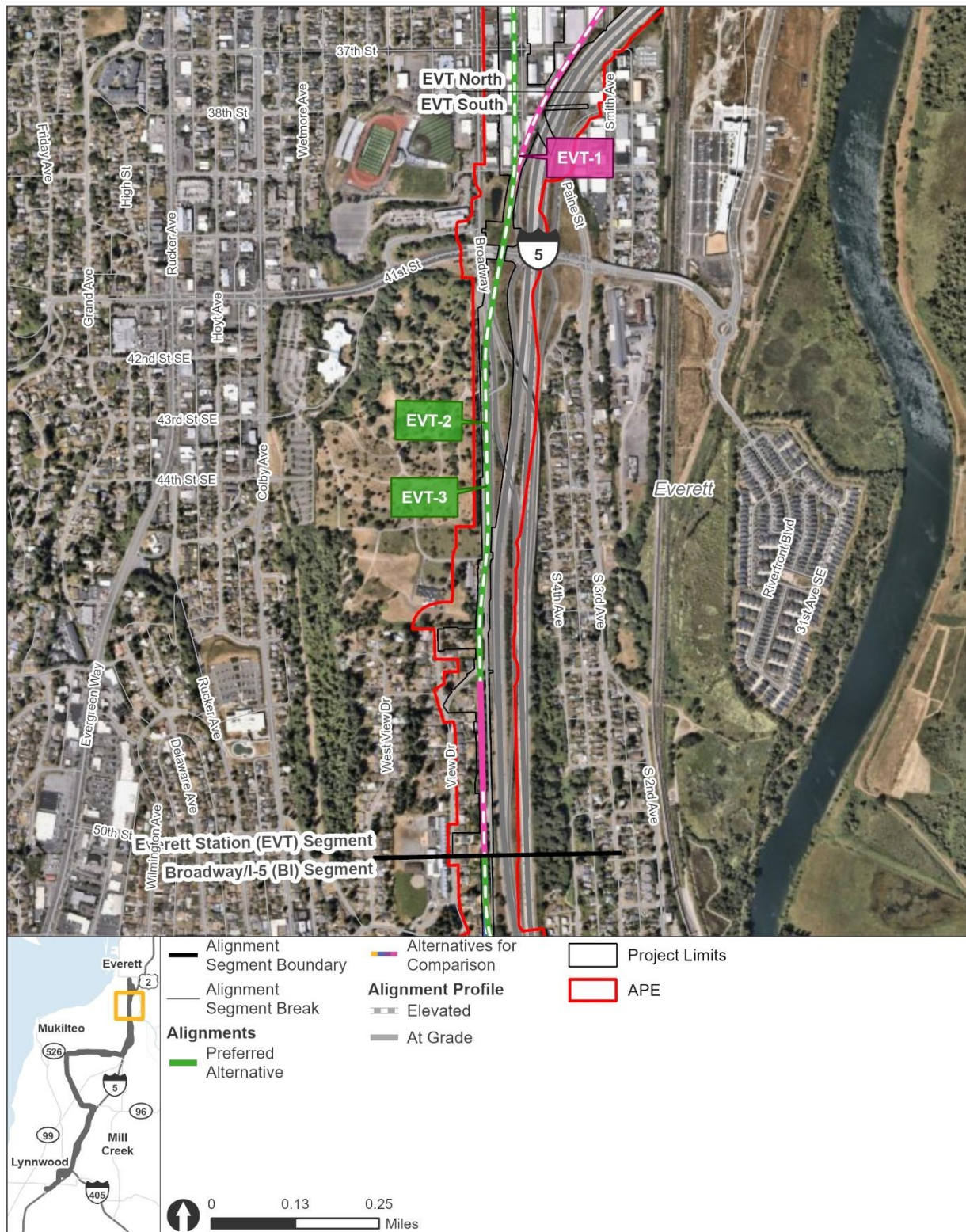


Figure F8-2 Everett Station Segment (North) – 2024 Aerial Imagery

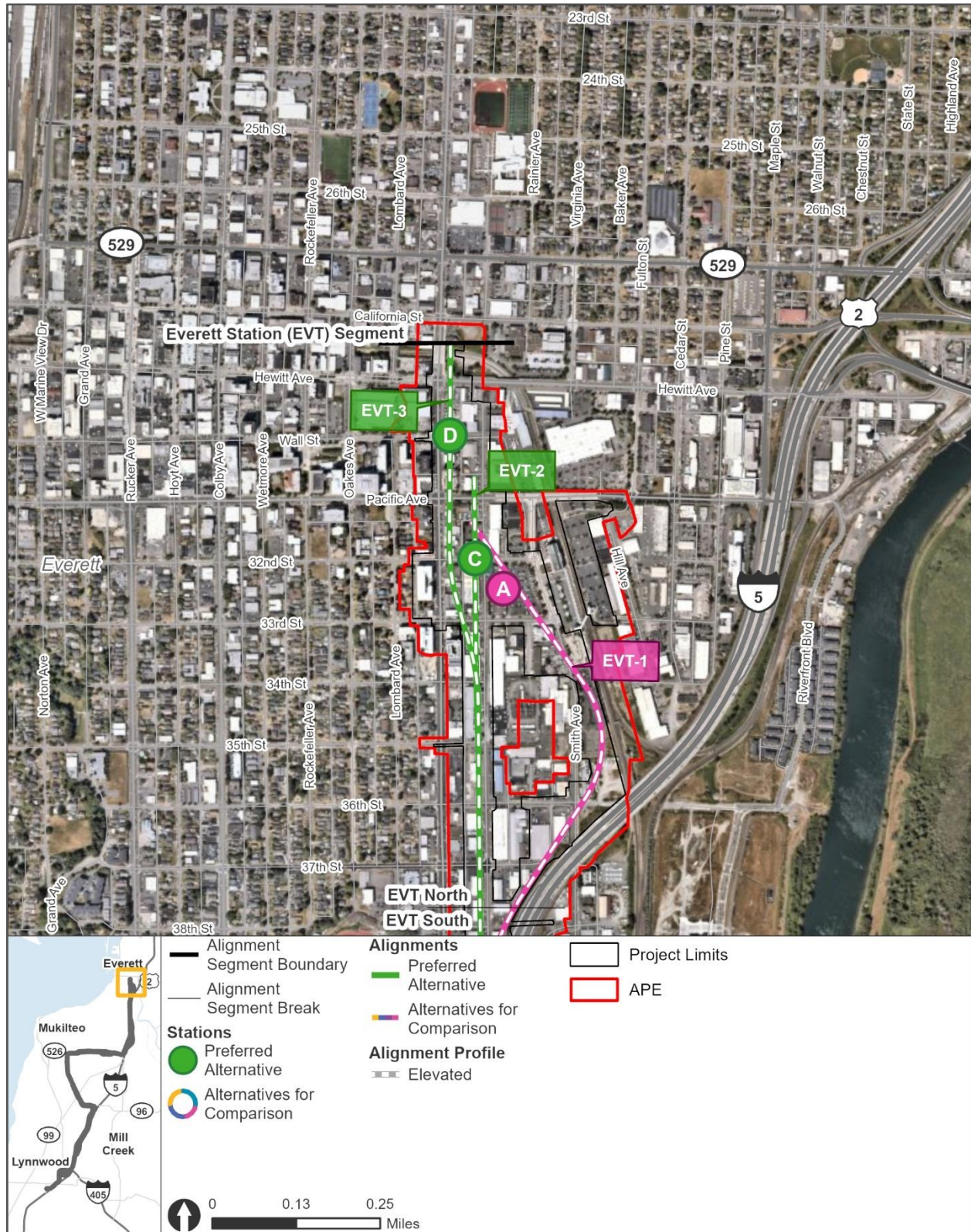


Figure F8-3 Everett Station Segment (South) – USGS Quadrangle

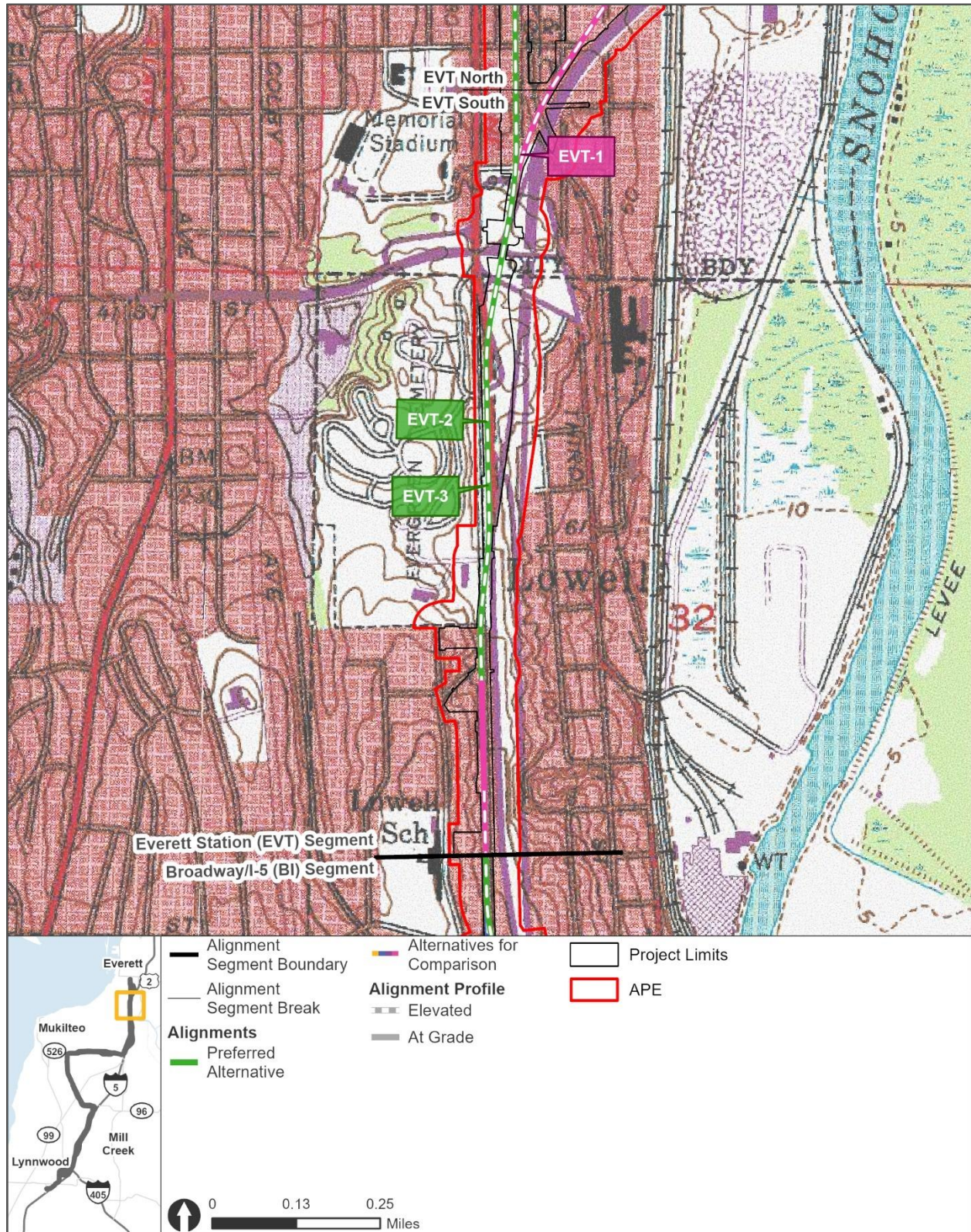


Figure F8-4 Everett Station Segment (North) – USGS Quadrangle

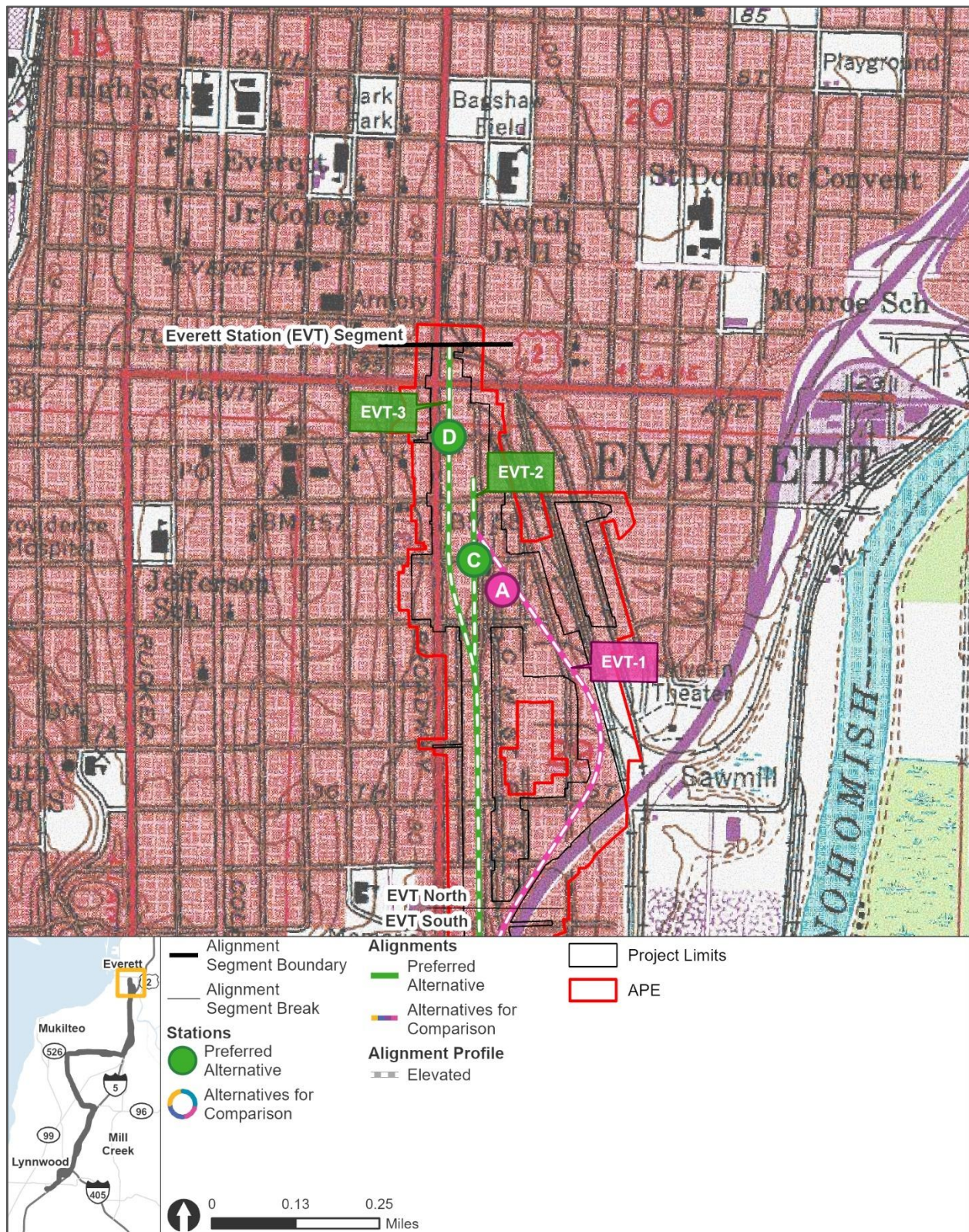


Figure F8-5 Everett Station Segment (South) – BLM GLO Plat

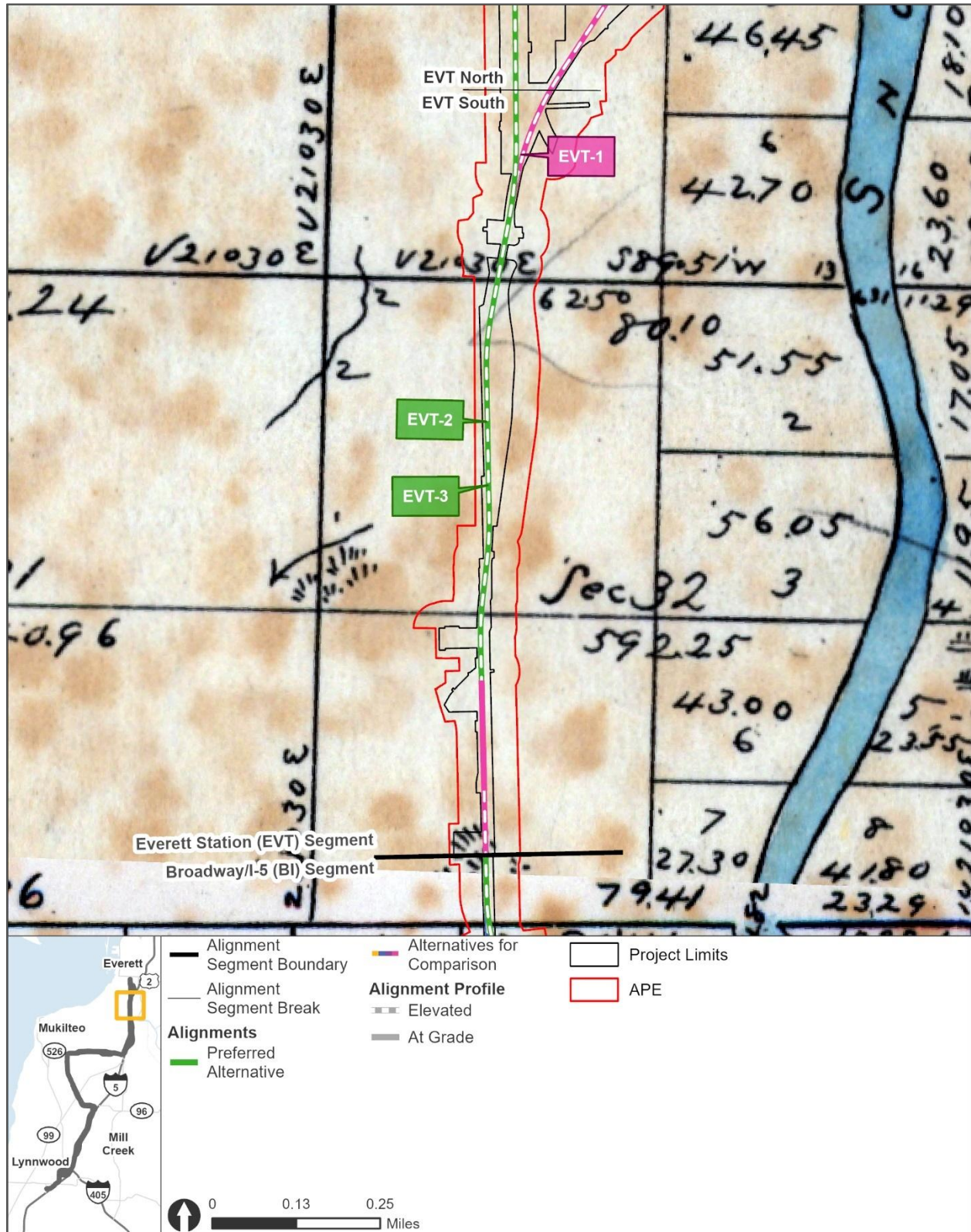


Figure F8-6 Everett Station Segment (North) – BLM GLO Plat

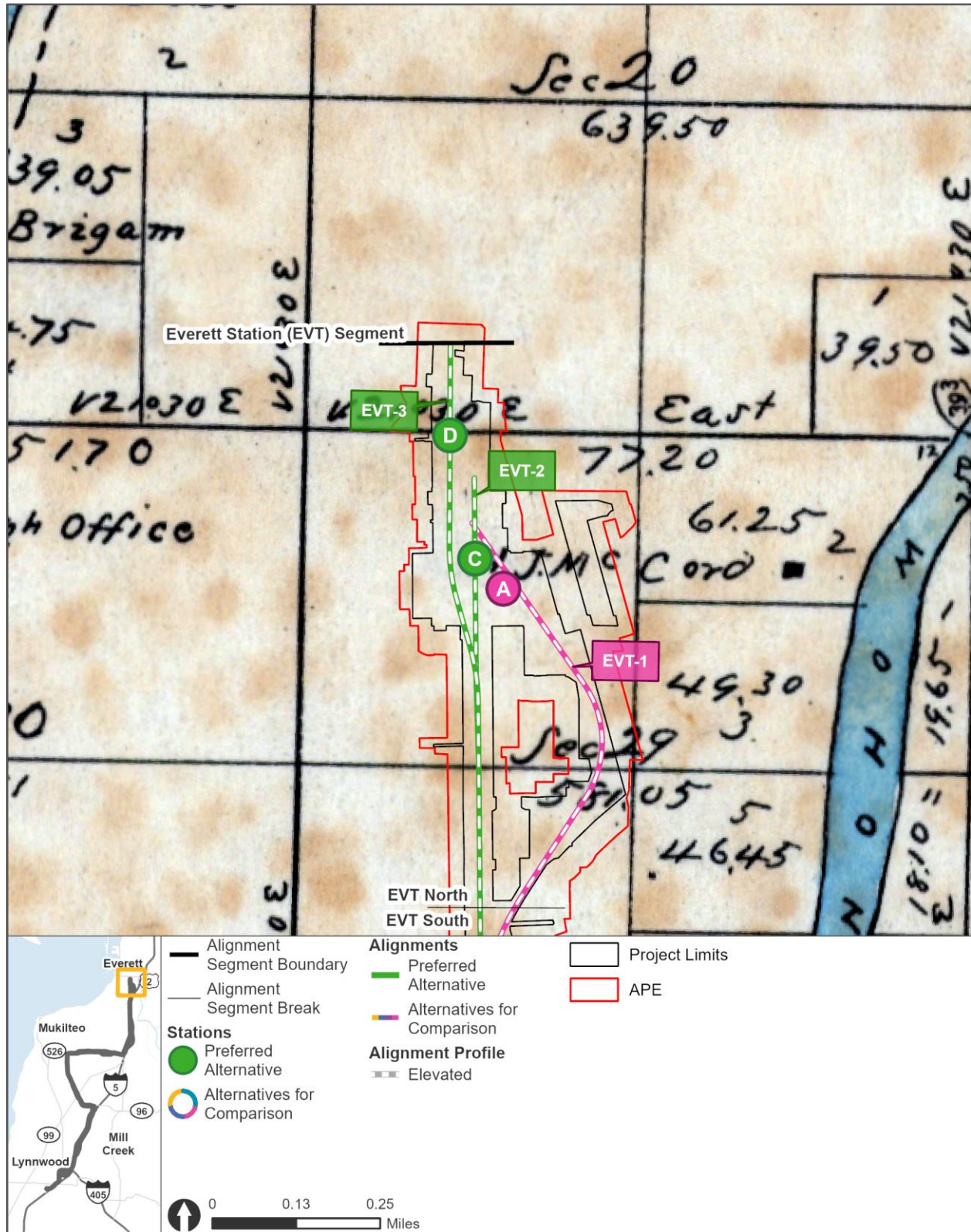


Figure F8-7 Everett Station Segment (South) – LiDAR Imagery

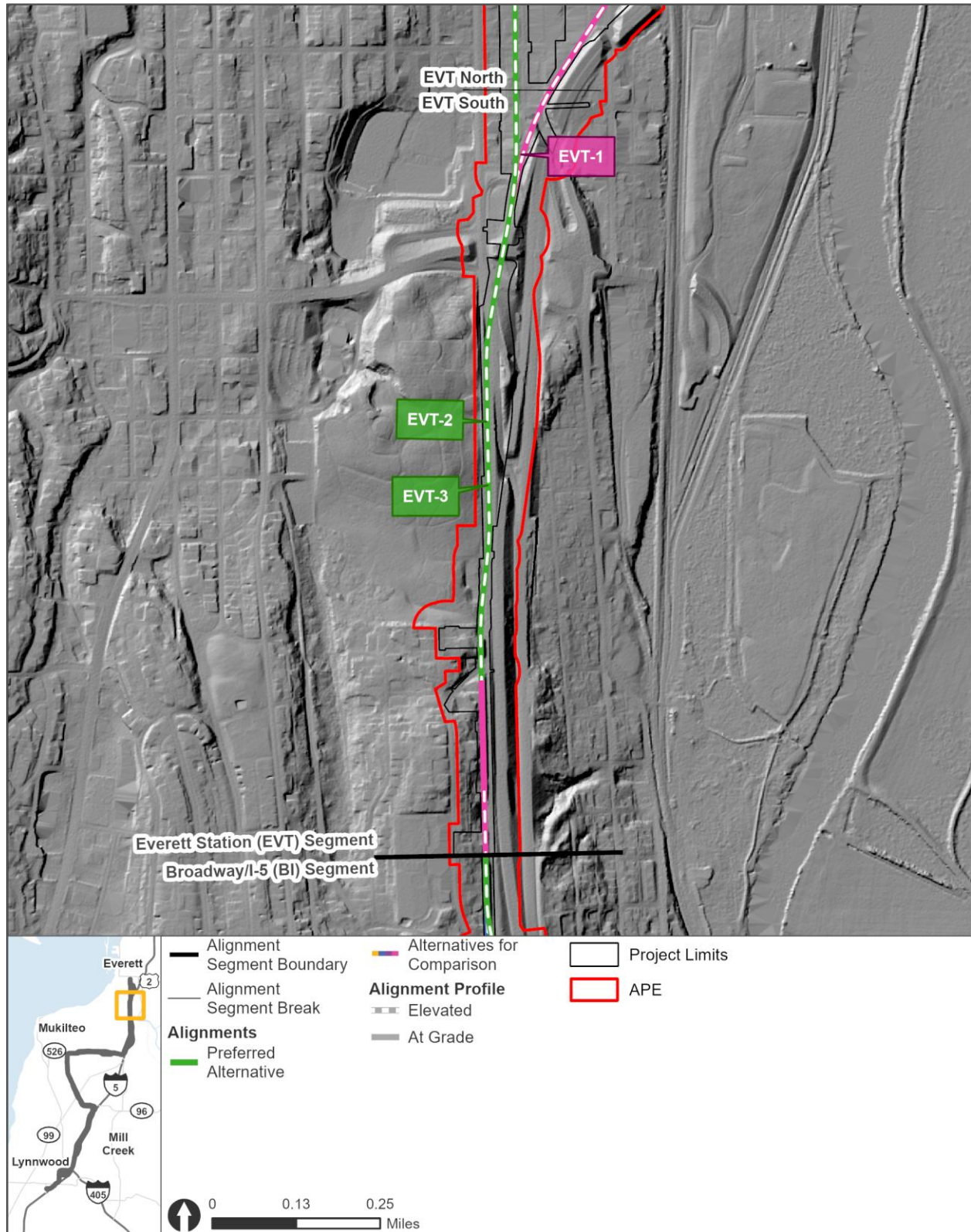
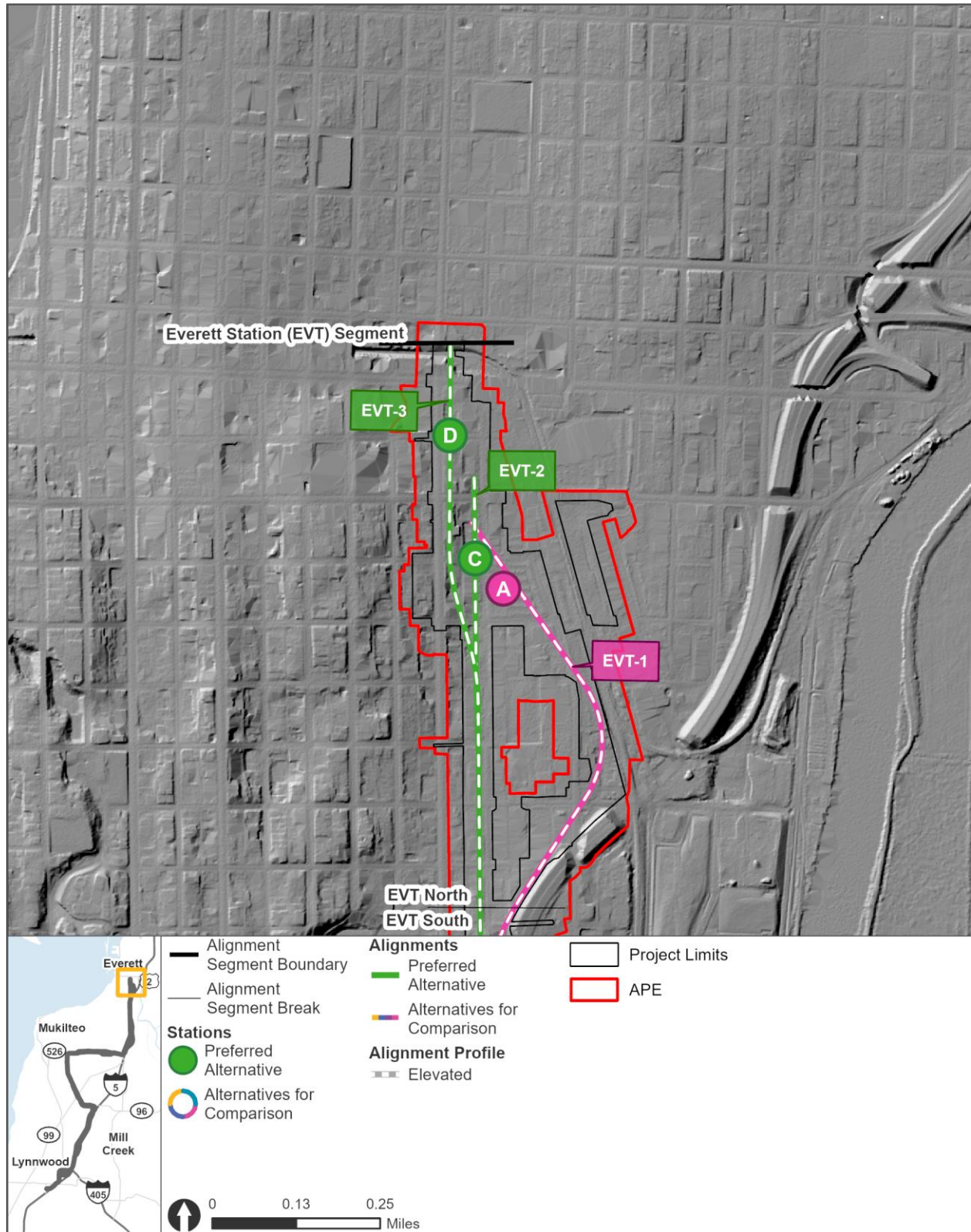


Figure F8-8 Everett Station Segment (North) – LiDAR Imagery



9 OMF SITE F

Figure F9-1 OMF Site F – 2024 Aerial Imagery

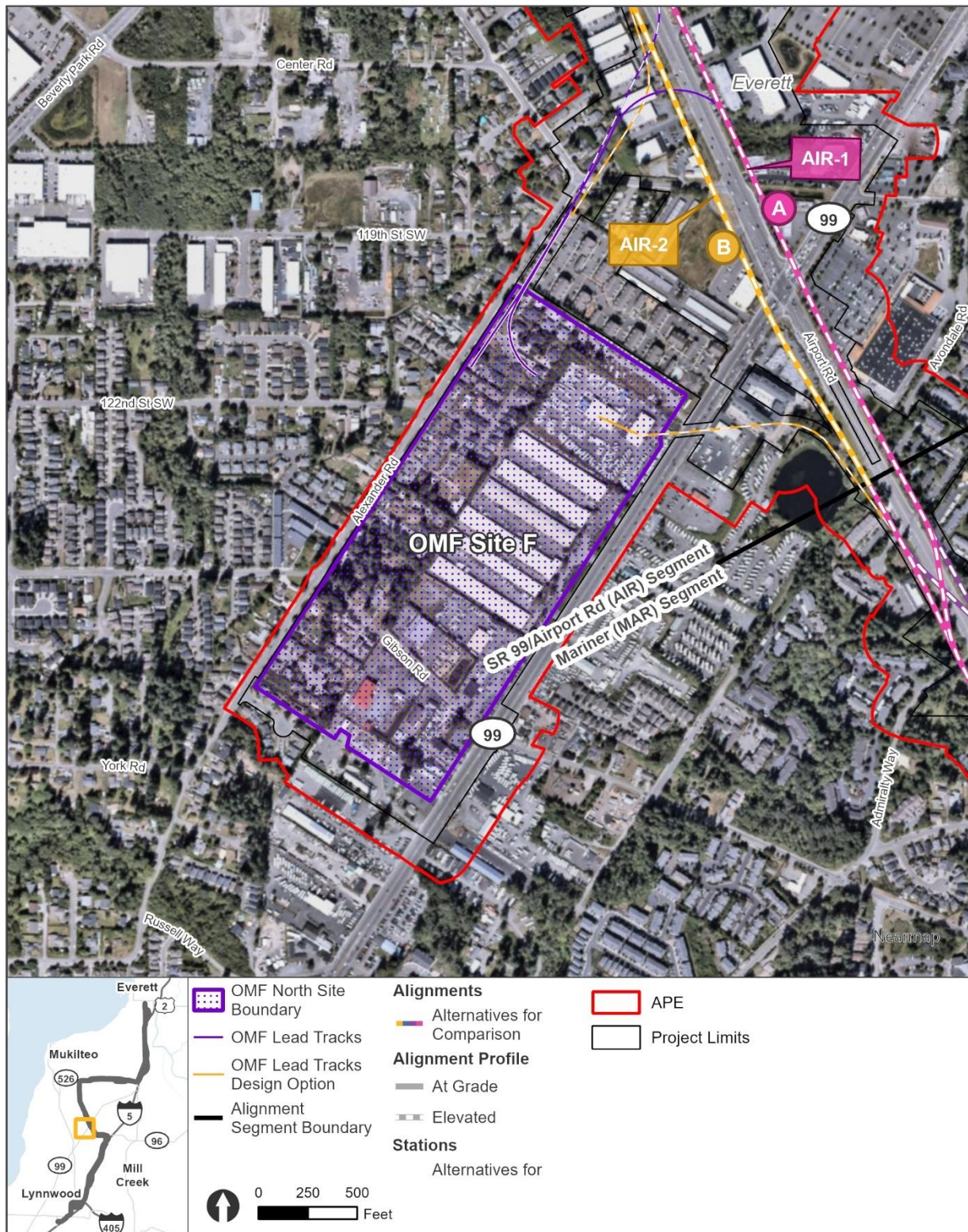


Figure F9-2 OMF Site F – USGS Quadrangle

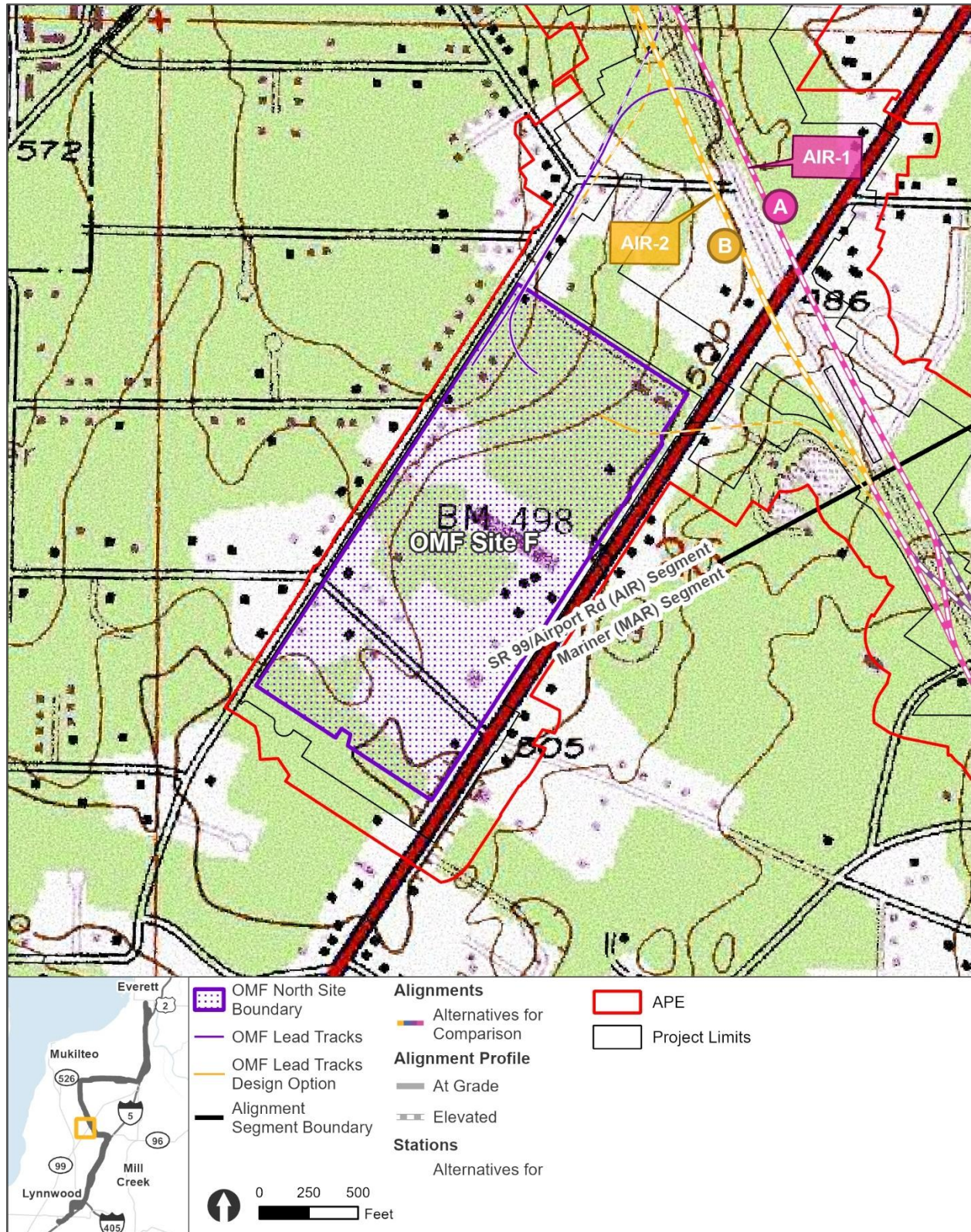


Figure F9-3 OMF Site F – BLM GLO Plat

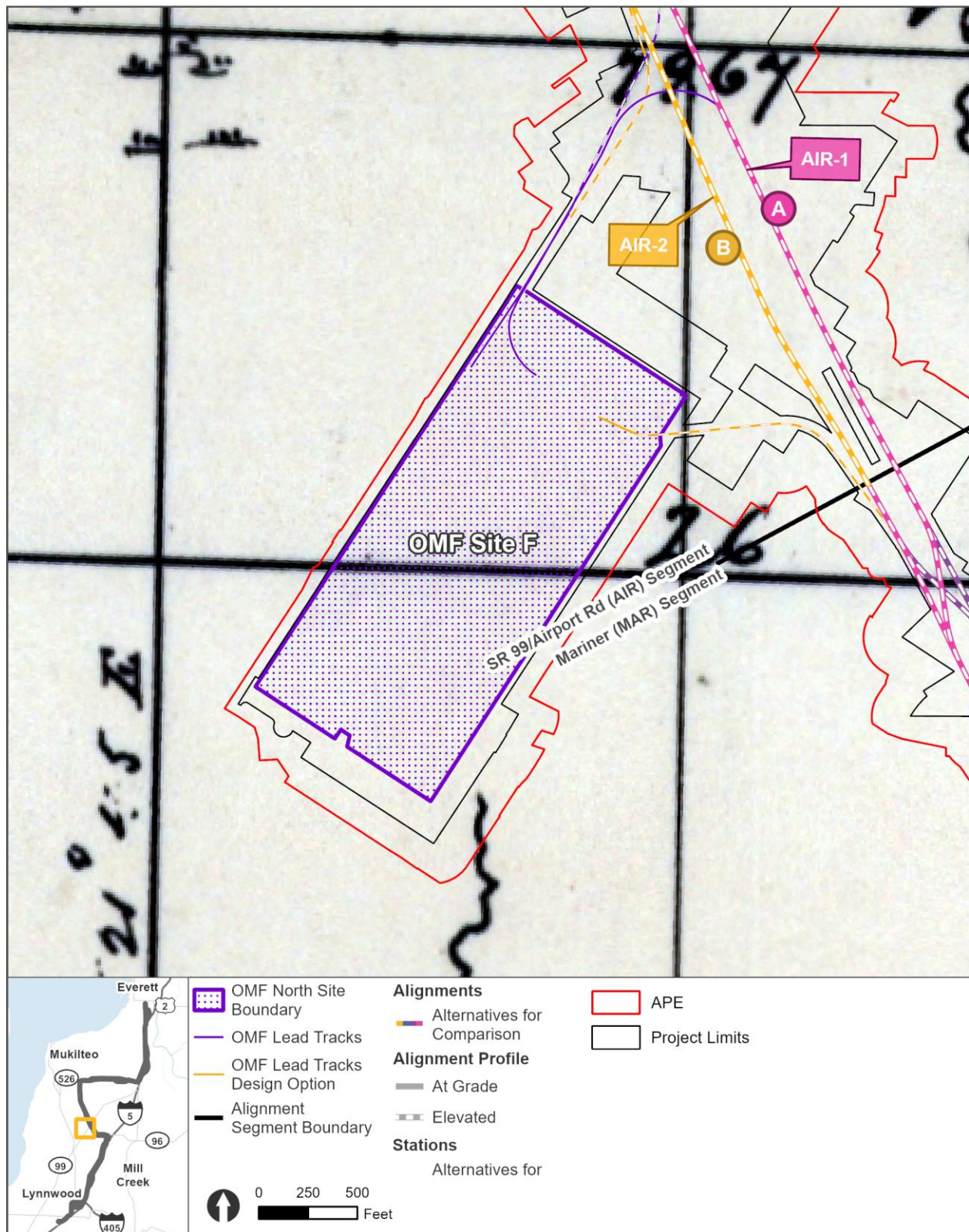
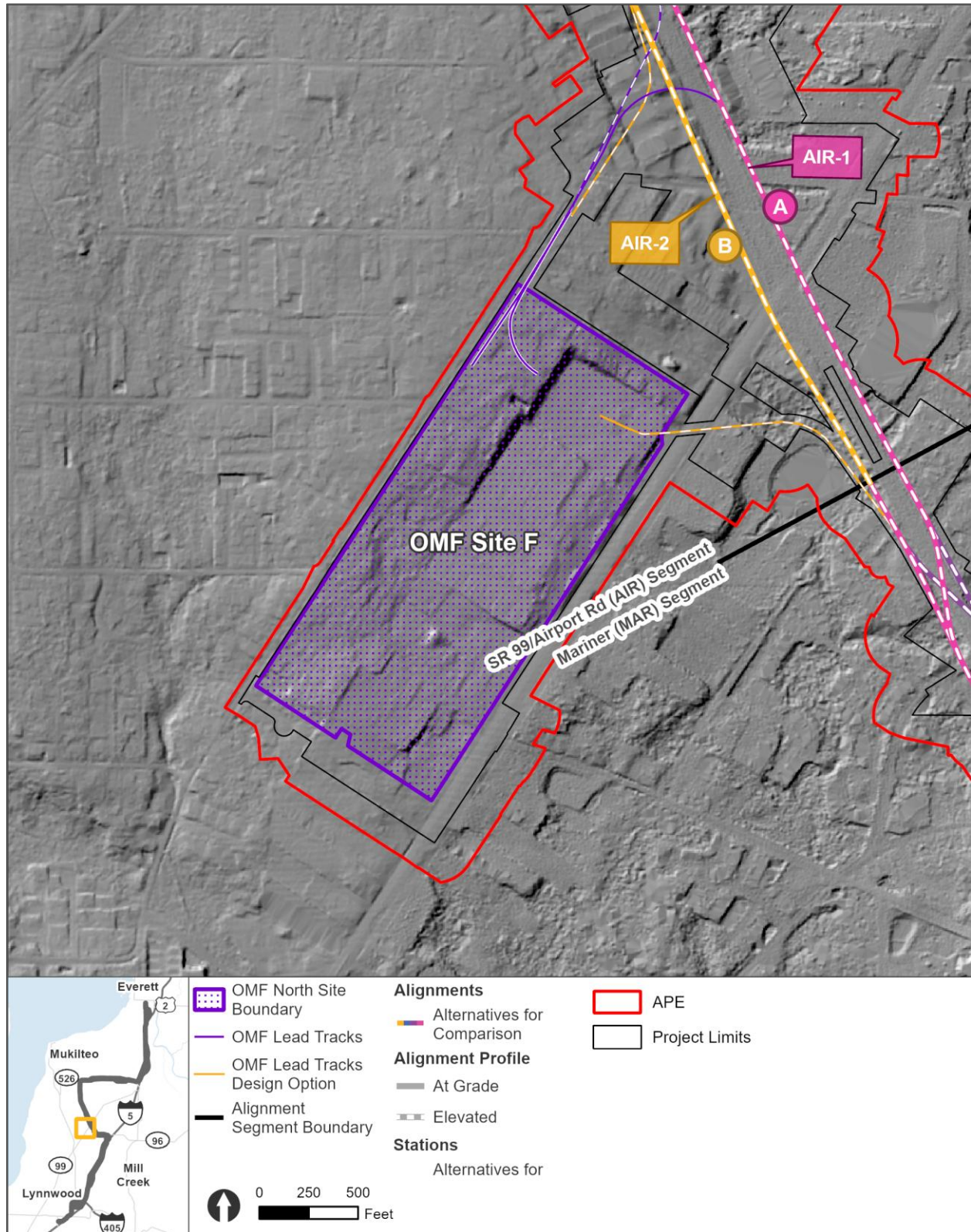


Figure F9-4 OMF Site F – LiDAR Imagery



10 OMF SITE E

Figure F10-1 OMF Site E – 2024 Aerial Imagery

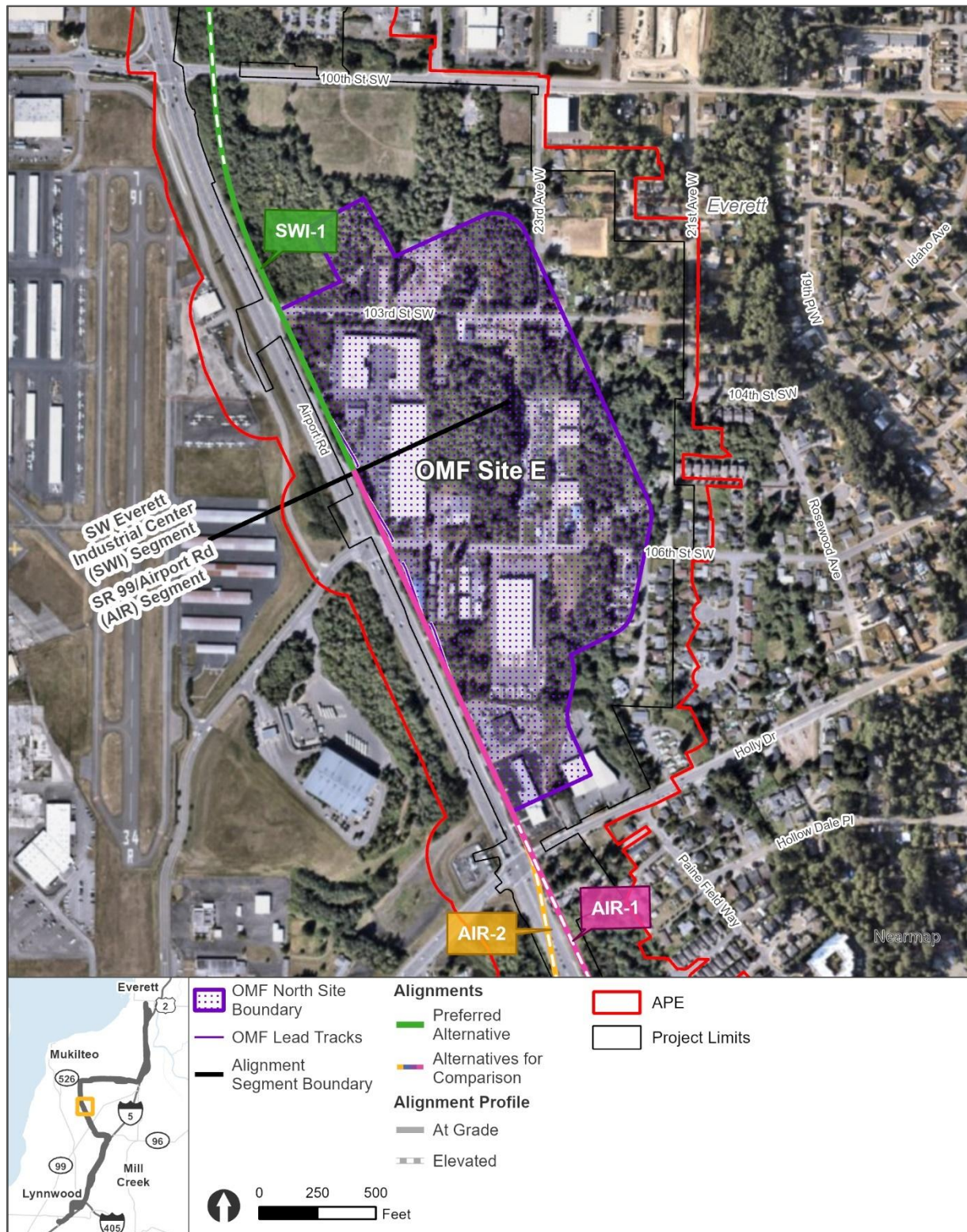


Figure F10-2OMF Site E – USGS Quadrangle

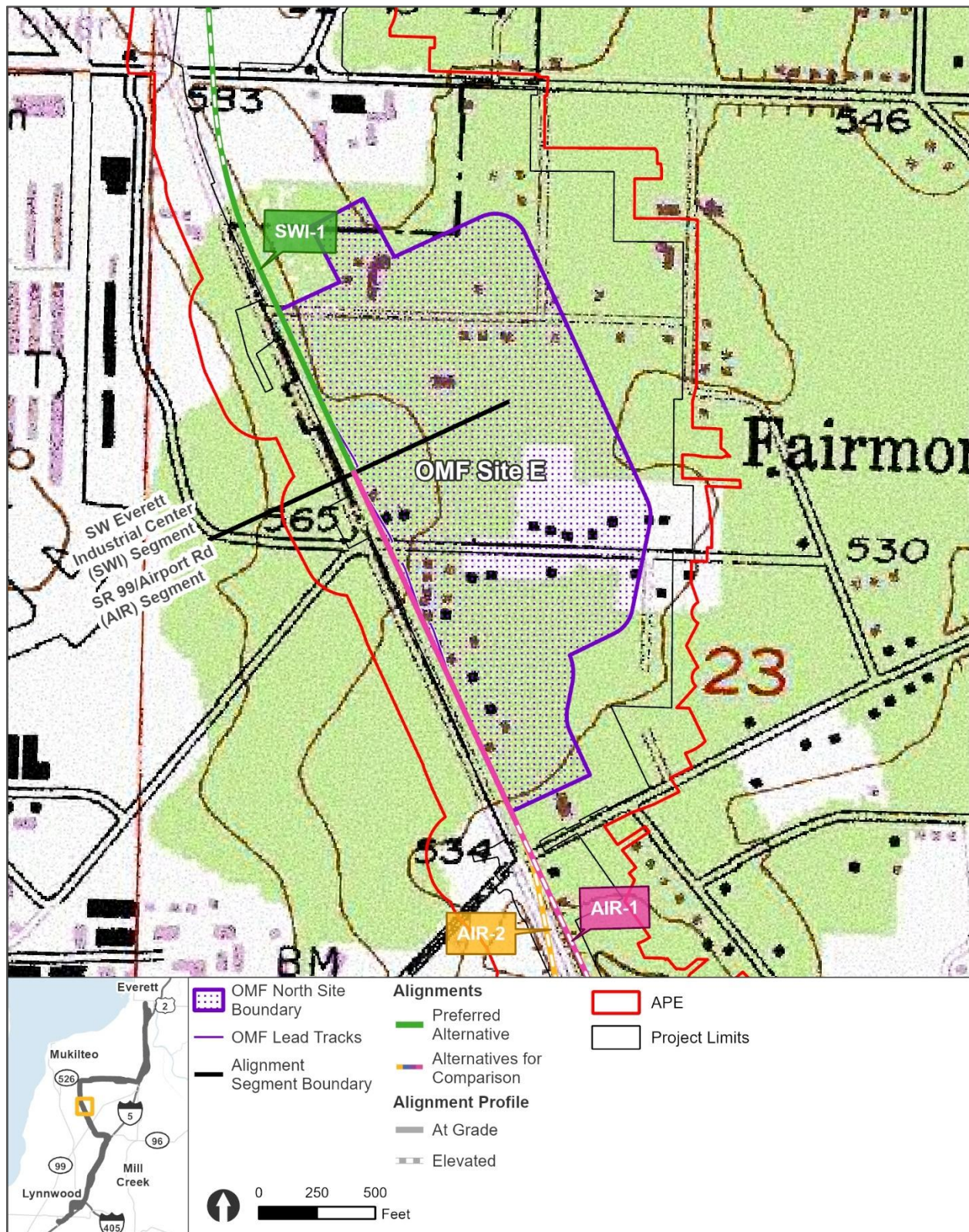


Figure F10-3OMF Site E – BLM GLO Plat

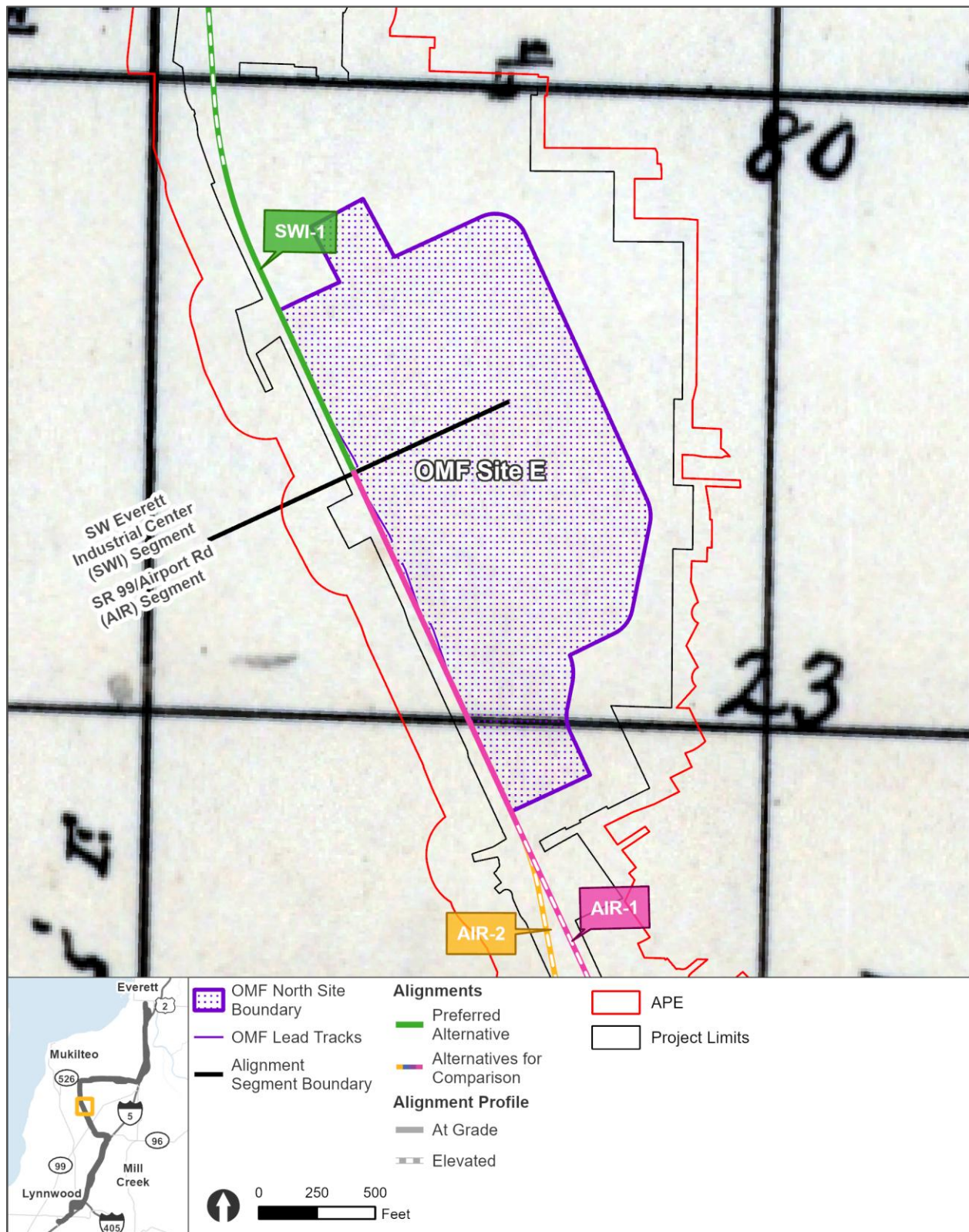
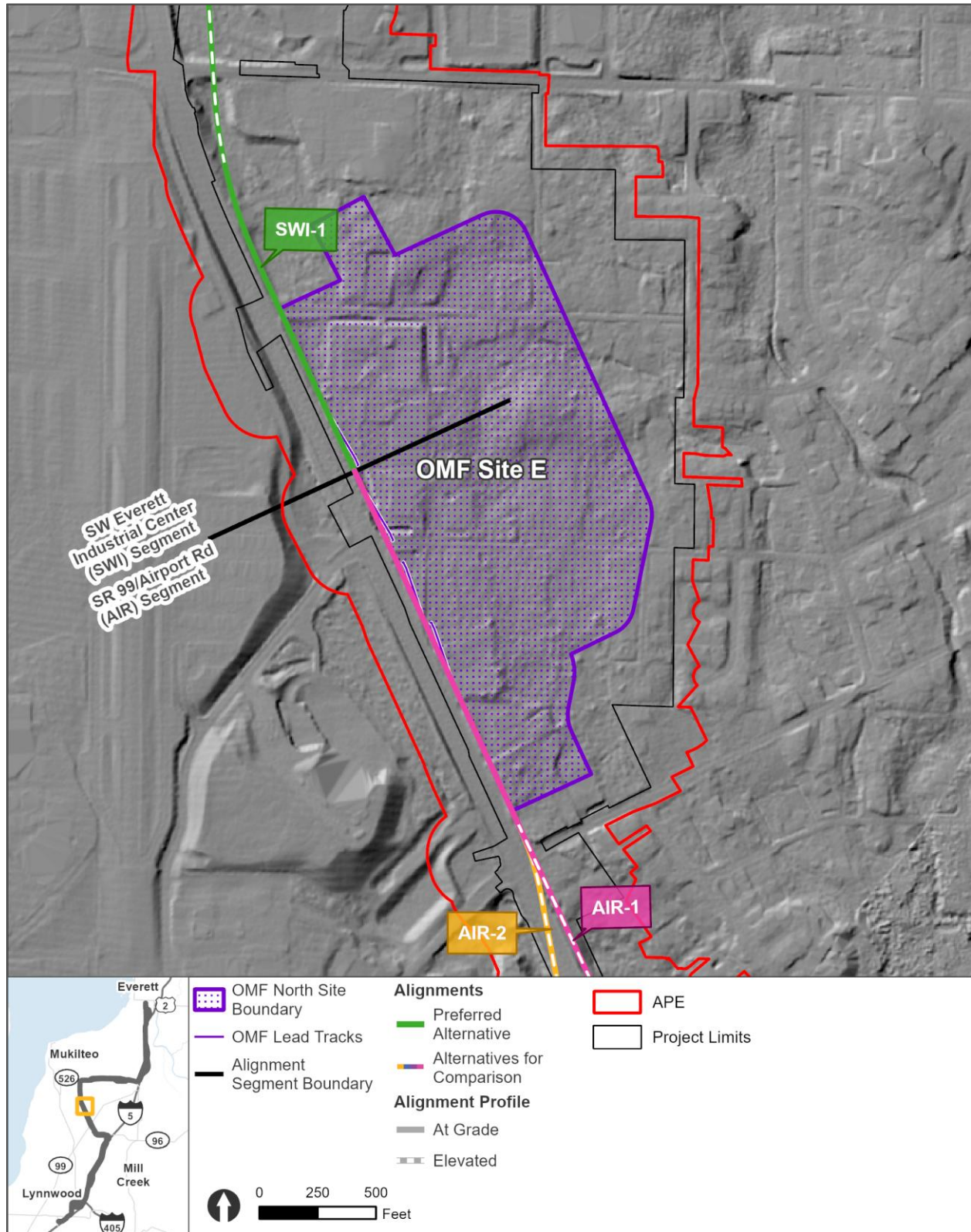


Figure F10-4OMF Site E – LiDAR Imagery



11 OMF SITE B

Figure F11-1 OMF Site B – 2024 Aerial Imagery

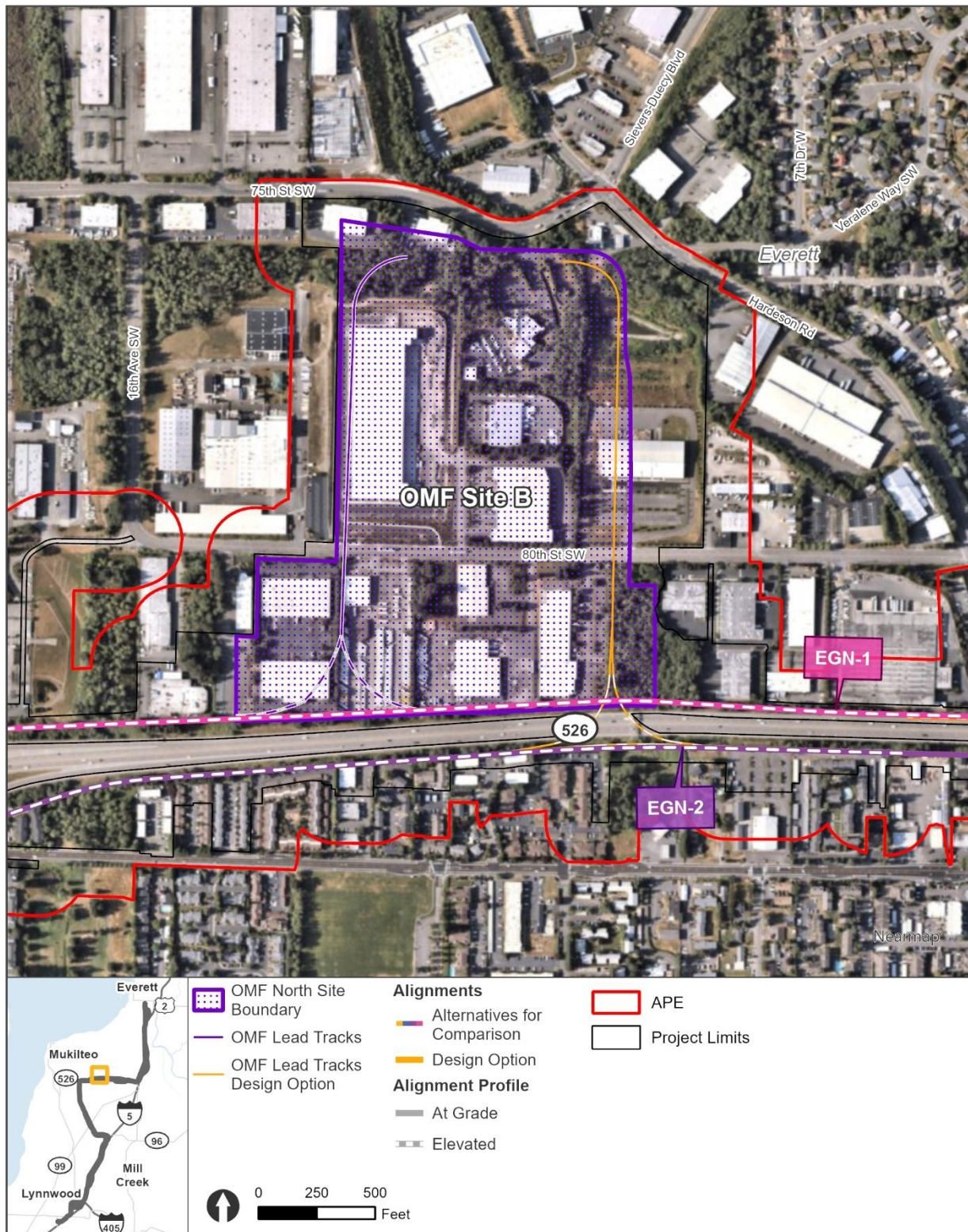


Figure F11-2OMF Site B – USGS Quadrangle

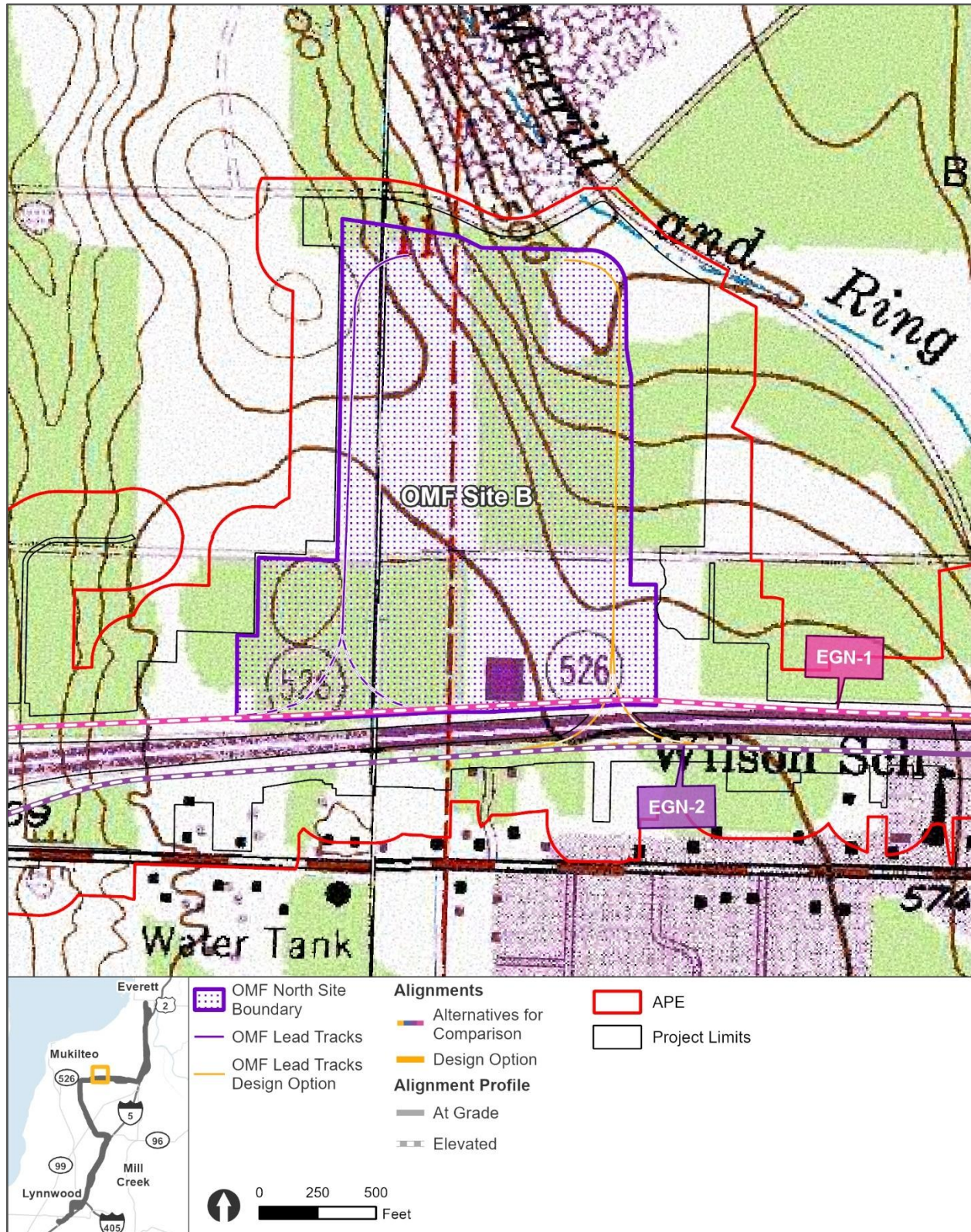


Figure F11-3OMF Site B – BLM GLO Plat

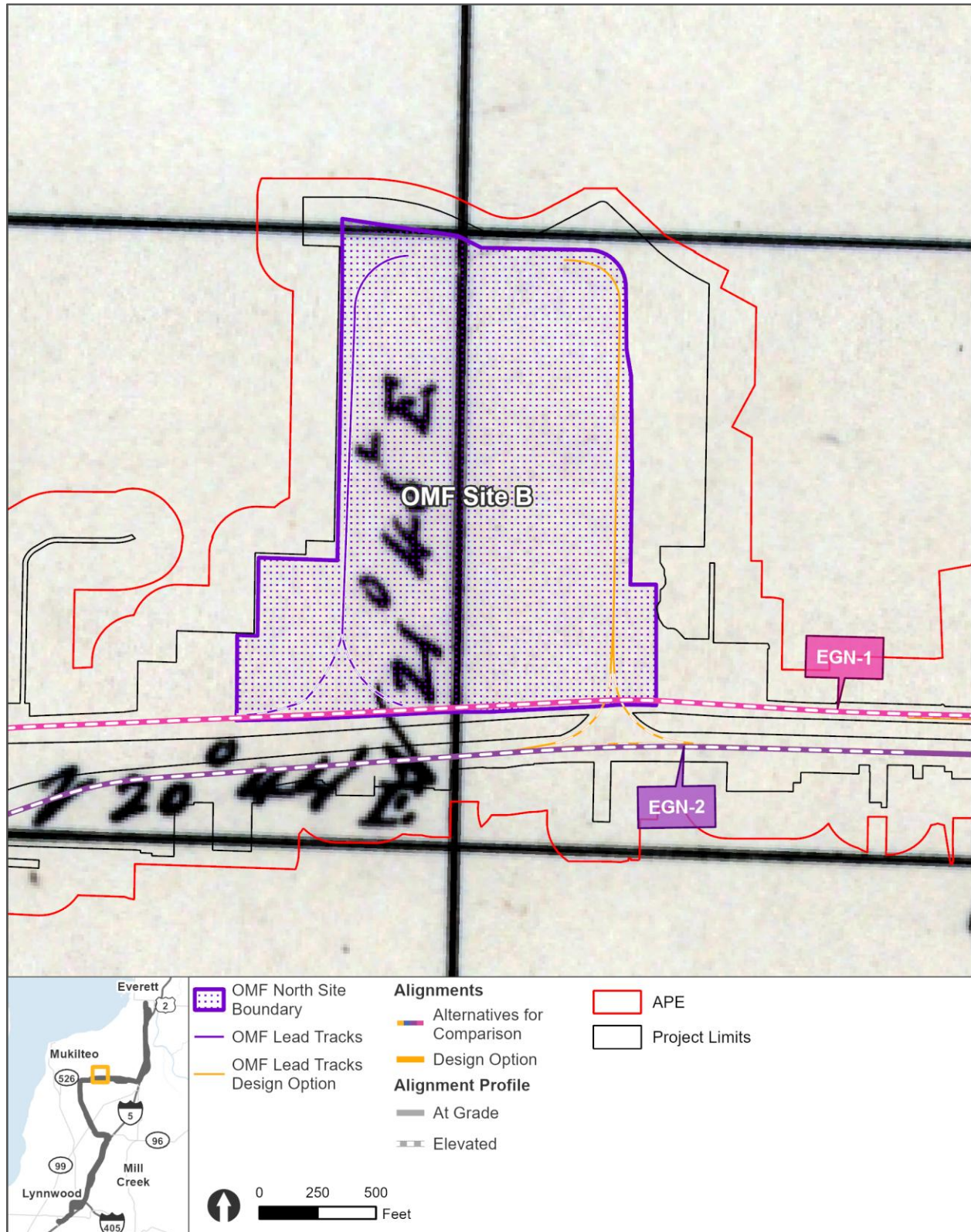
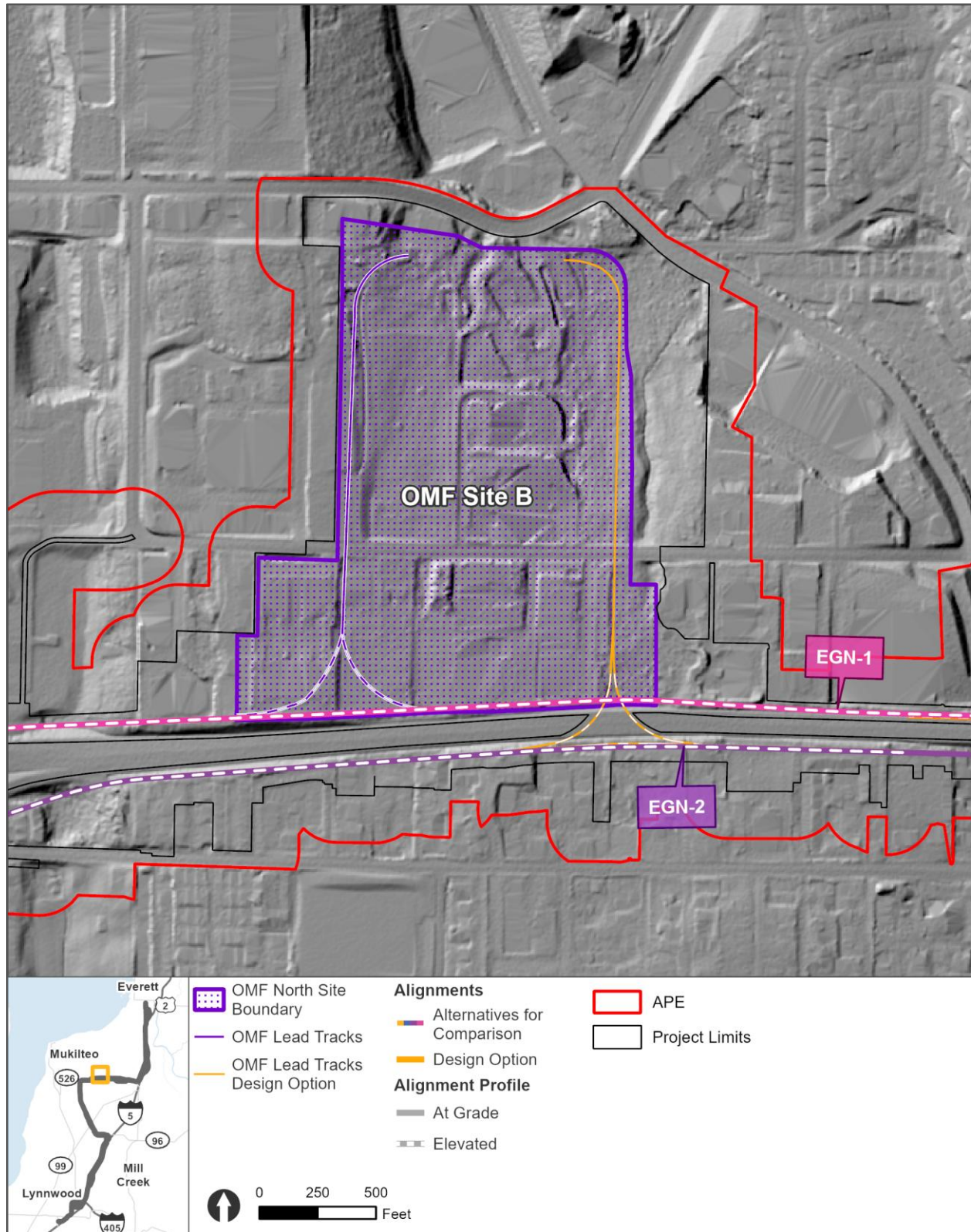


Figure F11-4OMF Site B – LiDAR Imagery





Everett Link Extension

ATTACHMENT G

Matrix, Shovel Probe, and Geotechnical Borehole Descriptions with Corresponding Maps

This attachment is redacted in accordance with 54 USC § 307103, 36 CFR §800.11(c), and RCW 42.56.300. Contains privileged information that is not for public disclosure.



Everett Link Extension

ATTACHMENT H

Previous Cultural Resources Survey Reports

Table H-1 Previous Cultural Resource Investigations Within the Background Research Area

NADB	Author(s)	Date	Title	Methods and Findings	Segment(s)	Within APE?
1688196	Berger	2016	Cultural Resources Assessment for the 196th Street SW (State Route [SR] 524) Improvement Project, Lynnwood, Snohomish County, WA.	No subsurface survey. No cultural resources.	ALD	Yes
1352059	Hartmann	2008b	Cultural Resources Assessment for the Lynnwood Cell Tower Project, Lynnwood, Snohomish County, Washington.	No subsurface survey. No cultural resources.	ALD	Yes
1694753	Lockwood and Schneider	2020	Lynnwood City Center Transit Station BRT and Roadway Improvements Project, Snohomish County, Washington Cultural Resources Assessment.	No subsurface surveys. No cultural resources.	ALD	Yes
1696726	Lockwood and Schneider	2022	Lynnwood 196th Street SE and 36th Avenue W Addendum, Lynnwood City Center Transit Station BRT and Roadway Improvements Project Cultural Resources. Assessment and Inadvertent Discovery Plan.	No subsurface surveys. No cultural resources.	ALD	Yes
1686029	Earley and Shantry	2014	Cultural Resources Assessment for the Poplar Way Extension Bridge Project Snohomish County, WA.	Nine SPs. No cultural resources.	ALD	Yes
1352118	Chidley	2008a	Request for Determination of Effects Concurrence I5—196th St. (SR 524) Interchange Project, Snohomish County, WA.	Four SPs. No cultural resources.	ALD	Yes
1348786	Earley	2006	Cultural Resource Assessment for the I-405/I-5 Swamp Creek Fish Passage Barrier Project, Snohomish County, WA.	Three SPs. No cultural resources.	ALD and ASH	Yes
1353740	Bundy	2009	Interstate 405 Corridor Survey: Phase III, I-405, SR 520 to I-5 Improvement Project.	No subsurface survey. No cultural resources.	ALD and ASH	Yes
1343337	Crowser	2002	Cultural Resources Clearance Survey Interstate 5 Ash Way Park and Ride HOV Direct Access Snohomish County, WA.	No subsurface survey. No cultural resources.	ASH	Yes

NADB	Author(s)	Date	Title	Methods and Findings	Segment(s)	Within APE?
1683941	Kelly and Hartmann	2013	Cultural Resources Assessment for the Ash Way Park & Ride Renovation, Lynnwood, Snohomish County, WA.	No subsurface survey. No cultural resources.	ASH	Yes
1693364	Scott et al.	2019	Cultural Resources Services for the Ash Way Roadway Improvement Project.	Six SPs. No cultural resources.	ASH and MAR	Yes
1685562	Holschuh	2014	Archaeological Survey of the Martha Lake North (SN4915) Telecommunications Facility Project Area, Snohomish County, WA.	One SP. No cultural resources.	ASH	Yes
1694447	Schneider et al.	2020	Swift Bus Rapid Transit Orange Line Cultural Resources Assessment.	10 SPs. No cultural resources.	ASH and MAR	Yes
1351380	Hartmann	2008a	Cultural Resources Assessment for the Swift Bus Rapid Transit Project, Technical Memo 0711A-3, Snohomish County, WA.	No subsurface surveys. No cultural resources.	AIR and EGN	Yes
1685986	McClintock and Peters	2014	Archaeological Investigation of the Paine Field Wetland Environmental Review Report (ERR) Enhancement & Detention Project.	Five SPs. No cultural resources.	SWI and OMF Site E	Yes
1685120	Baker and McReynolds	2014	Cultural Resource Survey, Proposed Telecommunications Tower Site, Site Name: Paine Field—New Building. Everett, Snohomish County, WA.	Five SPs. No cultural resources.	OMF Site E	Yes
1683970	Becker and McDaniel	2013	Cultural Resources Inventory Report—Boeing Everett Facility, Former Gun Club Area C and Pond D, Everett, Snohomish County, WA.	No subsurface surveys. No cultural resources.	SWI	Yes
1343550	Roedel et al.	2004	Everett High-occupancy vehicle lane (HOV) Cultural Resources Assessment, Interstate 5 HOV, SR 526 to SR 2 Vicinity, Snohomish County, Washington, Technical Report.	48 SPs. No cultural resources.	BI	Yes
1688973	Hennessey and Perkins	2017	Cultural Resources Survey for Snohomish Public Utility District (PUD) Beverly Park Project in Snohomish County, WA.	No subsurface surveys. No cultural resources.	BI	Yes

NADB	Author(s)	Date	Title	Methods and Findings	Segment(s)	Within APE?
1688317	Homan and Perkins	2016	Cultural Resources Survey for 2016 Snohomish District Priority Wood Pole Replacement Project, Snohomish County, WA.	No subsurface surveys. No cultural resources.	BI	Yes
1348189	Juell	2006	Archaeological Site Assessment of Sound Transit's Sounder: Everett-to-Seattle Commuter Rail System, King and Snohomish Counties, WA.	No subsurface surveys. No cultural resources.	EVT	Yes
1682948	Lenz et al.	2012	Cultural Resource Assessment for the Broadway Bridge Replacement Project, Everett, WA.	Three SPs. No cultural resources.	EVT	Yes
1354532	Silverman and Dellert	2010	Cultural Resources Assessment for the Hall Lake East Project, Snohomish County, WA.	26 SPs. Cultural resources observed.	ALD	No
1343666	LeTourneau and Nelson	2004	Results of Archaeological Field Investigations at Proposed Wetland Mitigation Sites for SR 524 Improvements, Snohomish County, WA.	119 SPs. Cultural resources observed.	ALD	No
1353293	Gillespie	2009	A Historical Resources Assessment of the Hall Lake East Project, Lynnwood, Snohomish County, WA.	No subsurface surveys.	ALD	No
1684583	Schultze and Tarman	2013	Cultural Resources Inventory of the Lynnwood Trail Connections Project – Interurban Trail, 54th to 52nd Ave West, City of Lynnwood, King County, WA.	Nine SPs. Cultural resources observed.	ALD	No
1695211	Parvey and Hushour	2021	Cultural Resources Inventory for the Scriber Creek Trail Improvements Project, Lynnwood, Snohomish County, WA.	13 SPs. No cultural resources.	ALD	No
1695297	Colón and Wilson	2021	Swift Bus Rapid Transit Orange Line Supplemental Cultural Resources Assessment.	No subsurface survey. No cultural resources.	ALD	No
1342623	Robbins and Johnson	1999	Proposed Regional Express Lynnwood Project Cultural Resource Assessment.	47 SPs. No cultural resources.	ALD	No

NADB	Author(s)	Date	Title	Methods and Findings	Segment(s)	Within APE?
1354531	Dellert and Butler	2010	Cultural Resources Assessment for the Gorman Hotel & Storage/Retail Project, Snohomish County, WA.	No subsurface survey. No cultural resources.	ALD	No
1343348	Stone	2001	A Cultural Resources Investigation of the Proposed Larch Way - Poplar Way Intersection Improvement Project, Snohomish County, WA.	Five SPs. No cultural resources.	ALD	No
1686354	Hushour and Diedrich	2014	Cultural Resources Assessment for the Thrasher's Corner to Hall Hake 115kV Reconductor, Snohomish County, WA.	Five SPs. No cultural resources.	ALD	No
1685553	Goodwin and Taylor	2014	Archaeological Survey for Proposed SN4952 Lynnwood 188th & 44th Telecommunications Facility, Lynnwood, WA Technical Memorandum.	No subsurface survey. No cultural resources.	ALD	No
1683606	Haney and Dellert	2013	Final Report Archaeological Inventory of the North Seattle Piggery Facility, Lynnwood, Snohomish County, WA.	Four SPs. No cultural resources.	ALD	No
1343665	Nelson and Blukis Onat	2003	Final Cultural Resources Assessment of the SR 524 (196 th St, SW/Filbert Road) Improvement Project, Snohomish County, WA.	Seven SPs. No cultural resources.	ALD	No
1350807	Thompson, Gillespie, and Kaehler	2008	Archaeological and Historical Resources Assessment for the Edmonds School District No. 15 Conversion of Land and Water Conservation Fund Use from Existing Lynnwood High School to a New High School Site, Snohomish County, WA	12 SPs. No cultural resources.	ALD	No
1698755	Elder and Lentz	2024	Area of Potential Effects Addendum and Cultural Assessment for the Scriber Creek Trail Improvements Project, Lynnwood, WA.	2 SPs. No cultural resources.	ALD	No

NADB	Author(s)	Date	Title	Methods and Findings	Segment(s)	Within APE?
1698107	Gardner	2022e	Cultural Resources Assessment for the 42nd Ave West Improvements Segment 1 – Alderwood Mall Boulevard to 196th Street SW Project, Lynnwood, Snohomish County, Washington.	No subsurface survey. Cultural resources observed.	ALD	No
1683943	Kelly (2013)	2013	Cultural Resources Assessment for the 36th/35th Avenue West Improvement Project, Snohomish County, WA.	No subsurface survey. No cultural resources.	ALD and ASH	No
1350456	Thompson et al.	2007	Archaeological and Historical Resources Assessment for the Edmonds School District No. 15 Conversion of Land and Water Conservation Fund Use from the Existing Lynnwood High School to a New High School Site. City of Bothell. Snohomish County, WA.	11 SPs. No cultural resources.	ASH	No
1682997	Scott and Cooper	2013	Cultural Resources Assessment for the North Road Improvement Project, Snohomish County, WA.	54 SPs and four machine tests. No cultural resources.	ASH	No
1343374	Robinson	1999	An Archaeological Survey of the Washington State Department of Transportation's SR525/SR99: Manor Way Wetland Mitigation Site Project, Snohomish County, WA.	Five SPs. No cultural resources.	ASH	No
1348271	Hovezak	2006	Archaeological Evaluation of Two Historic Period Grave Markers at 15329 2nd Avenue W., Lynnwood, Snohomish County, WA.	No subsurface survey. No cultural resources.	ASH	No
1343333	Dugas	2002	Heritage Resources Investigation for SR 527164th Street SE Widening and Culvert Replacement Snohomish County, WA.	51 SPs. No cultural resources.	ASH	No
1690183	Berger	2017	Cultural Resources Assessment for the Lake Stickney Parkway Project, Lynnwood, Snohomish County, WA.	13 SPs. No cultural resources.	ASH	No

NADB	Author(s)	Date	Title	Methods and Findings	Segment(s)	Within APE?
1684858	Piper and Rinck	2014	Cultural Resources Assessment for the S1209 Swamp Creek Interceptor Extension Project, Paine Field—Lake Stickney, Snohomish County, WA.	Two SPs. No cultural resources.	MAR and AIR	No
1348759	Bundy	2006	Cultural Resources Survey, Washington State Department of Transportation, 1-5 124th St. Bicycle/Pedestrian Overcrossing Phase 2, Snohomish County, WA.	Three SPs. No cultural resources.	MAR	No
1692530	McWilliams and Steinkraus	2019	Cultural Resources Survey for the SR 96 North Creek Fish Passage Project, Snohomish County, WA.	Seven SPs. No cultural resources.	MAR	No
1696380	Carlson	2022	Cultural Resources Assessment for the Silver Lake Water and Sewer District 10th Drive SE Water and Sewer Main Improvements Project, Snohomish County, WA.	25 SPs. No cultural resources.	MAR	No
1352245	Chidley	2008	Cultural Resources Assessment. T-Mobile® Silver Lake Terrace/ SNOPUD/Stewart Telecommunication Cell Tower Site, Snohomish County, WA.	No subsurface survey. No cultural resources.	MAR	No
1698866	Matson	2024	Cultural Resources Assessment for the DR Horton Ashton Park, residential development, (TPNs: 00374700000700, 00374700000601, 00374700000603), Lynnwood, Snohomish County, Washington.	31 SPs. No cultural resources.	ASH	No
1686090	Baldwin and Solmo	2014	Cultural Resources Review for Cultural Resources Review for the T-Mobile Mill Creek Town Center Cellular Project, Mill Creek, Snohomish County, Washington.	2 SPs. No cultural resources.	MAR	No
1341772	Rooke	2002	Letter Report Concerning: Procedures and results of a cultural resources survey of Cingular Wireless Tower Site WA-810--01 (Northend) in King County, WA.	No subsurface survey. No cultural resources.	ASH, MAR, and AIR	No

NADB	Author(s)	Date	Title	Methods and Findings	Segment(s)	Within APE?
1689132	Parvey and Rinck	2017	Cultural Resources Assessment for the Lake Stickney Park Project, Phase 1, Snohomish County, WA.	11 SPs. No cultural resources.	ASH, MAR, and AIR	No
1692257	Gerrish and Wetherbee	2018	Cultural Resources Assessment for the Harbour Reach Drive Extension Project, Mukilteo, Snohomish County, WA.	17 SPs. No cultural resources.	AIR	No
1695926	Steinkraus	2016	Cultural Resources Assessment for the Harbour Pointe Boulevard Southwest Widening Project, Mukilteo, Snohomish County, WA.	Eight geotechnical boreholes. No cultural resources.	AIR	No
1681782	Hoyt et al.	2011	Cultural Resources Assessment of the Snohomish County Airport Manufacturing Facility Project, Snohomish County, WA.	36 SPs. No cultural resources.	AIR	No
1696572	Gardner	2021	Cultural Resources Assessment for the Paine Field Distribution Center Project, Everett, Snohomish County, WA.	49 SPs. Cultural resources observed.	AIR	No
1685307	Campbell	2014	Archaeological Survey for Proposed SN4921 Paine Field South Telecommunications Facility, Everett, WA.	No subsurface survey. No cultural resources.	AIR	No
1347467	Robinson and Rice	2004	A Cultural Resource Survey for Potential Historical Properties at Olympus Terrace Sewer District's Big Gulch Project, Mukilteo, Washington.	No subsurface survey. No cultural resources.	SWI	No
1352951	Kenmotsu	2008	Cultural Resources Inventory, Taxilane Kilo-South and Adjacent Property, Snohomish County Airport/Paine Field.	10 SPs. No cultural resources.	SWI	No
1696654	McWilliams	2022	Cultural Resources Inventory for the Scannell Industrial Project, City of Everett, Snohomish County, WA.	37 SPs. No cultural resources.	SWI	No
1696573	Kretzler	2022	Cultural Resources Assessment for the Bhend Property Project, Everett, Snohomish County, WA.	Eight SPs. No cultural resources.	SWI	No

NADB	Author(s)	Date	Title	Methods and Findings	Segment(s)	Within APE?
1682814	Rinck	2012	DRAFT: Archaeological Assessment of the Smuggler's Gulch Stormwater Low Impact Development (LID) Project, Mukilteo.	13 SPs. No cultural resources.	SWI	No
1343320	Landreau and Geffen	2003	A Section 106 Archaeological Review and Inventory at the Proposed Paine Field Telecommunications Facility, Snohomish County, WA.	One SP. No cultural resources.	SWI	No
1685323	Stipe	2014	A Cultural Resources Survey for the SEA Nelsons Corner – New Build.	No subsurface survey. No cultural resources.	SWI	No
1690850	Middleton	2018	Cultural Resources Assessment for the Stormwater Decant Facility Project, Mukilteo, Snohomish County, WA.	One SP. No cultural resources.	SWI	No
1683454	Piper et al.	2013	Cultural Resources Assessment for Boeing North Tower Project.	45 SPs. No cultural resources.	SWI	No
1683893	Iversen et al.	2012	Cultural Resources Field Inventory for 15 Action Areas within the Puget Sound Nearshore Ecosystem Restoration Projects (PSNERP) Area, NW Washington.	55 SPs. No cultural resources.	BI	No
1352370	Brannan and Schmidt	2009	A Cultural Resources Survey for the Maple Valley–Snohomish Joint Use Fiber, Snohomish and King Counties, WA.	No subsurface surveys. No cultural resources.	BI	No
1682058	Sharpe et al.	2012	City of Snohomish Everett Conveyance Project.	29 SPs. No cultural resources.	BI	No
1351989	Juell	2003a	A Heritage Resources Assessment of the 41st Street Overcrossing and Railroad Track Removal and Upgrade Projects, Everett, WA.	No subsurface surveys. No cultural resources.	BI and EVT	No
1685223	Mastrangelo and Holschuh	2014	Archaeological Survey of the Everett 52nd & Broadway (SN4936)	No subsurface surveys. No cultural resources.	BI	No
1687897	Molchany	2014	Mid-Century Everett: A Context Statement for Post-War Residential Development, Modern-era Design, and the Claremont Neighborhood.	No subsurface surveys. No cultural resources.	BI and EVT	No

NADB	Author(s)	Date	Title	Methods and Findings	Segment(s)	Within APE?
1351180	Shantry and Hodges	2007	Cultural Resources Assessment for the Everett Riverfront Master Plan and Redevelopment Project.	58 SPs. No cultural resources.	BI and EVT	No
1691560	Steinkraus	2017	Historic Property Report for the Longfellow Building and Annex at 3715 Oakes Avenue in Everett, WA.	No subsurface surveys. No cultural resources.	EVT	No
1683379	Pinyerd	2013	Sprint Project.	No subsurface surveys. No cultural resources.	EVT	No
1344193	Johnson	2000	Letter to Molly Adolfson Regarding Proposed California Street Overpass, Everett.	No subsurface surveys. No cultural resources.	EVT	No
1685767	Undem et al.	2014	Results of Cultural Resources Monitoring at the Kimberly-Clark Worldwide Site Upland Area, Everett, Washington. SWCA Project No. 24976	Subsurface surveys. Cultural resources observed.	EVT	No
1694736	Johnson	2020	FINAL Results of Archaeological Monitoring for the Kimberly-Clark Everett Interim Action.	No subsurface surveys. No cultural resources.	EVT	No
1685545	Sackett	2014	Architectural Survey and Evaluation: Naval Station Everett.	No subsurface surveys. No cultural resources.	EVT	No
1341134	Shong and Juell	2002	DRAFT - Cultural Resources Inventory for the City of Everett's Water Transmission Pipeline Replacement Project - Phase 5, Snohomish County, WA.	40 SPs. No cultural resources.	EVT	No
1343126	Juell	2003b	Cultural Resources Assessment for the City of Everett's Water Transmission Pipeline Replacement Project – Phases 6 and 7.	50 SPs. No cultural resources.	EVT	No
1698087	Gardner	2022d	Historic Property Evaluation for Kimberly-Clark Warehouse Demolition Everett, Snohomish County, Washington.	No subsurface survey. Cultural resources observed.	EVT	No

NADB	Author(s)	Date	Title	Methods and Findings	Segment(s)	Within APE?
1698569	Scott et al.	2023	Port Gardner Storage Facility (PGSF) and West Marine View Drive (WMVD) Conveyance, Everett, Snohomish County, Washington – Cultural Resources Assessment.	No subsurface investigations. No cultural resources.	EVT	No
1698424	Cottrell-Crawford and Alsobrook	2024	Cultural Resource Survey for the Forest Park Pickleball Project, Everett, Washington.	No subsurface survey. Cultural resources observed.	EVT	No
1347117	McClintock	2006	I-5 Everett HOV Project Water Quality Site #1 Cultural Resources Investigation.	8 SPs and 2 machine tests. Cultural resources observed.	EVT	No
1344172	Shong	2003	Monitoring Results for the Everett Water Pipeline Replacement No. 2 and 3 (Phase 5), Township 29 North, Range 5 East, Sections 26 and 28.	No subsurface survey. No cultural resources.	EVT	No
1346887	Mayo, Paul and Robin McClintock	2005	I-5 Everett HOV Project Water Quality Site #1 Cultural Resource Investigation.	8 SPs. Cultural resources observed.	EVT	No



Everett Link Extension

ATTACHMENT I

Draft Programmatic Agreement

1 **PROGRAMMATIC AGREEMENT AMONG THE FEDERAL TRANSIT ADMINISTRATION,**
2 **THE WASHINGTON STATE DEPARTMENT OF ARCHAEOLOGY AND HISTORIC**
3 **PRESERVATION, AND THE CENTRAL PUGET SOUND REGIONAL TRANSIT AUTHORITY**
4 **IMPLEMENTING SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR**
5 **THE EVERETT LINK EXTENSION PROJECT, SNOHOMISH COUNTY, WASHINGTON**

6 **WHEREAS**, the Central Puget Sound Regional Transit Authority (Sound Transit) proposes to
7 construct approximately 16 miles of light rail and an operations and maintenance facility in
8 Snohomish County, Washington, known as the Everett Link Extension (the Project), pursuant to
9 the Sound Transit 3 plan of regional transit system investments, funding for which was approved
10 by voters in the region in 2016; authorized by 49 U.S.C. Chapter 53. The Project is divided into
11 eight (8) segments: West Alderwood, Ash Way, Mariner, SR-99/Airport Road, SW Everett
12 Industrial Center, SR-526/Evergreen, Broadway/I-5, and Everett Station.

13 **WHEREAS**, subject to the commitment of local funding, the Project will utilize funds
14 administered by the Federal Transit Administration (FTA) authorized by 49 U.S.C. Chapter 53;

15 **WHEREAS**, FTA has determined that the Project is an undertaking subject to the requirements
16 of 36 CFR Part 800, the regulations implementing Section 106 of the National Historic
17 Preservation Act (NHPA), 54 U.S.C. §306108, as amended (August 5, 2004);

18 **WHEREAS**, the United States Army Corps of Engineers (USACE) is a Cooperating Agency
19 pursuant to 40 CFR 1501.6 and 40 CFR 1508.5 and may issue permits authorizing the
20 discharge of dredged or fill material in conjunctions with the Project construction pursuant to 33
21 USC § 11 and Section 404 of the Clean Water Act (Section 404), 33 USC § 1251-1376, as
22 amended, as well as permits pursuant to 33 USC 408 and 33 USC § 403 of the Rivers and
23 Harbors Act (Section 10);

24 **WHEREAS**, FTA and USACE have agreed that FTA will act as Lead Federal Agency for Section
25 106 compliance and will act on behalf of the USACE;

26 **WHEREAS**, the Federal Aviation Administration (FAA) is a Cooperating Agency under NEPA
27 and may provide approvals for construction and construction related activities that have the
28 potential to impact their jurisdiction.

29 **WHEREAS**, FTA and FAA have agreed that FTA will act as Lead Federal Agency for Section
30 106 compliance and will act on behalf of the USACE;

31 **WHEREAS**, the Federal Highway Administration (FHWA) is a Cooperating Agency under NEPA
32 and may issue an Airspace Lease as well as approvals for other modifications to the interstate
33 system.

34 **WHEREAS**, FTA and FHWA have agreed that FTA will act as Lead Federal Agency for Section
35 106 compliance and will act on behalf of the USACE;

36 **WHEREAS**, in accordance with 36 CFR § 800.14(b) and § 800.6, on **DATE** FTA has notified the
37 Advisory Council on Historic Preservation (ACHP) of its intent to use a Programmatic
38 Agreement (Agreement) to partially fulfill its Section 106 obligations for the Project and has
39 invited ACHP to participate in the development of this Agreement, and on **DATE** the ACHP has
40 **chosen not** to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii);

41 **WHEREAS**, FTA has initiated consultation in accordance with 36 CFR § 800.3(c) with the
42 Washington State Historic Preservation Officer (SHPO), Department of Archaeology and
43 Historic Preservation (DAHP) in coordination with Sound Transit (under DAHP Project No. 2024-

05-03293), and is continuing the Section 106 process for the Project with an Agreement in accordance with 36 CFR § 800.14(b) because the effects of the Project on historic properties cannot be fully determined prior to approval of the Project, and the Project will have an Adverse Effect on # known properties determined eligible for listing in the National Register of Historic Places (NRHP), herein referred to as historic properties as defined in 36 CFR § 800.16(l)(1);

WHEREAS, under this Agreement, pursuant to 36 CFR § 800.2(a)(3), FTA delegated Sound Transit to consult directly with DAHP on FTA's behalf, with FTA remaining responsible for designating Consulting Parties and making all findings and determinations pursuant to 36 CFR Part 800;

WHEREAS, FTA has invited Sound Transit to be an Invited Signatory to this Agreement as they are the project proponent and are required to carry out the commitments identified in this Agreement as a stipulation for funding of the project by FTA;

WHEREAS, pursuant to 36 CFR § 800.2(c)(2)(ii) and 36 CFR § 800.14(b) and (f), FTA has initiated consultation with the following federally recognized Tribes and invited their participation in the development of this Agreement: Confederated Tribes and Bands of the Yakama Nation, Duwamish Tribal Organization, Muckleshoot Indian Tribe, Lummi Tribe of the Lummi Reservation, Port Gamble S'Klallam Tribe, Samish Indian Nation Sauk-Suiattle Indian Tribe, Snohomish Tribe of Indians, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe, Swinomish Indian Tribal Community, Tulalip Tribes, Upper Skagit Indian Tribe. The named federally recognized Tribes are collectively referred to here as "Consulting Tribes" and FTA invited all of the Consulting Tribes to sign this Agreement as Concurring Parties;

WHEREAS, in correspondence with Sound Transit, the Samish Indian Nation and the Lummi Tribe of the Lummi Reservation both declined to continue consultation on the project with the understanding that Tribes closer to the project vicinity were engaged in consultation;

WHEREAS, FTA acknowledges its continued responsibility to engage in meaningful government-to-government consultation with the Consulting Tribes (pursuant to Executive Order 13175, 54 U.S.C. § 302706(b)), the January 26, 2021 Presidential Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships, and 36 C.F.R. § 800.2(c)(2) throughout the process of carrying out the stipulations of this Agreement as applicable. This Agreement does not alter the existing government-to-government relationship between FTA and any Tribe. Additionally, nothing in this Agreement is intended to repeal, supersede, or modify any right, privilege, or immunity granted, reserved, or established pursuant to treaty, statute, or Executive Order pertaining to any Tribe, nor is it intended to confer any additional right, privilege, or immunity not otherwise granted, reserved, or established pursuant to treaty, statute, or Executive Order pertaining to any Tribe;

WHEREAS, FTA has prepared this Agreement in consultation with the City of Everett, City of Lynnwood History & Heritage Board, Lynnwood-Alderwood Manor Heritage Association, Snohomish County Historic Commission, Snohomish County, Washington Trust for Historic Preservation regarding the effects of the Project on historic properties and the development of mitigation measures and stipulations. The named organizations are collectively referred to here as "Consulting Parties";

WHEREAS, Sound Transit has coordinated with the non-federally recognized Duwamish Tribal Organization, the Snohomish Tribe, and the public on the effects of the Project on historic properties and the development of mitigation measures and stipulations;

WHEREAS, FHWA and Sound Transit recognize that Tribes possess special expertise in identifying NRHP-eligible places of religious and cultural significance to the Tribes; assessing

1 Program effects to these historic properties; and identifying measures to avoid, minimize, or
2 mitigate any adverse effects to these historic properties;

3 **WHEREAS**, FTA, in coordination with Sound Transit, has defined the Area of Potential Effect
4 (APE) for the Project as depicted in Attachment A, and consulted on the APE with DAHP,
5 Consulting Tribes and other Consulting Parties;

6 **WHEREAS**, FTA, in coordination with Sound Transit, and in consultation with DAHP, Consulting
7 Tribes and other Consulting Parties has completed the inventory of the historic built environment
8 to identify historic properties as defined by 36 CFR § 800.16(1) that are listed in, or eligible for
9 listing in, the NRHP, the results of which are shown in Attachment B of this Agreement, and
10 DAHP has concurred with these determinations;

11 **WHEREAS**, as the design and construction advance, FTA, in coordination with Sound Transit,
12 may be required to conduct inventory of areas added to the APE to identify and evaluate historic
13 properties that could potentially be affected by the Project and, if needed, shall do so in
14 consultation per the terms of this Agreement;

15 **WHEREAS**, because of lack of access, FTA, in coordination with Sound Transit, has completed
16 limited survey to identify archaeological resources as defined by 36 CFR § 800.16(1) that are
17 listed in, or eligible for listing in the NRHP but may be adversely affected by ground disturbing
18 work for the project and have agreed to implement a process for further identification and
19 evaluation of archaeological sites pursuant to 36 CFR § 800.4(b)(2), and defer until after the
20 execution of this Agreement additional identification and evaluation of archaeological sites,
21 assessment of Adverse Effects, and resolution of Adverse Effects, if needed, as provided for in
22 this Agreement;

23 **WHEREAS**, FTA, in coordination with Sound Transit, has consulted with DAHP, Consulting
24 Tribes, other Consulting Parties, and the ACHP on Adverse Effect(s) to known historic
25 properties, including buildings, structures, sites, districts, and objects within the APE, that are
26 anticipated to arise as a result of the Project;

27 **WHEREAS**, FTA in coordination with Sound Transit, and in consultation with DAHP, Consulting
28 Tribes, and other Consulting Parties, has determined that the Project will have an Adverse
29 Effect on the following known historic properties, which are listed or eligible for listing in the
30 NRHP: Commercial building located at 4111 Alderwood Mall Boulevard in the City of Lynnwood,
31 Washington (WISAARD Property ID 729232) and the residence located at 2316 47th Street
32 Southeast in the City of Everett, Washington (WISAARD Property ID 729197) [ADDITIONAL
33 ADVERSELY EFFECTED PROPERTIES TO BE HERE, AS DETERMINED THROUGH
34 ONGOING SECTION 106 CONSULTATION PROCESS];

35 **WHEREAS**, FTA in coordination with Sound Transit, and in consultation with DAHP, Consulting
36 Tribes, and other Consulting Parties, has determined that historic properties included in
37 Attachment B but not listed above as adversely affected, will not be adversely affected by the
38 Project;

39 **WHEREAS**, measures are included in this Agreement to avoid and/or minimize effects to
40 historic properties through a design development and review process and the implementation of
41 protection measures for historic properties during Project construction;

42 **WHEREAS**, the Project is defined here as the Preferred Alternative identified in the Draft
43 Environmental Impact Statement (EIS) published on **DATE** for the West Alderwood, SW Everett
44 Industrial Center, Broadway/I-5, and Everett Station segments. An "end to end" Preferred
45 Alternative, including a preferred site for OMF North, was not identified prior to publication of the
46 Draft EIS; however, a Preferred Alternative will be identified in the Final EIS and will be the

1 subject of ongoing Section 106 consultation. This Preferred Alternative may include refinements
2 made by Sound Transit's Board of Directors when selecting the project to be built and is
3 anticipated in this Agreement to be selected as the project to be built. If portions or all of the
4 project to be built as selected by the Sound Transit Board of Directors includes different
5 alternatives than those included as the Preferred Alternative in the Final EIS then this
6 Agreement will be revised to reflect such changes.

7 **WHEREAS**, FTA shall consult with DAHP, Consulting Tribes, and other Consulting Parties on
8 revisions to the APE and on additional investigation within the revised APE that may be required
9 as a result of changes to the Project, following the execution of this Agreement. Such
10 consultation will follow the processes outlined in Stipulation VI. FTA shall also consult with the
11 Signatories of this Agreement and other Consulting Tribes and other Consulting Parties on
12 effects to newly identified historic properties and shall resolve Adverse Effects to newly identified
13 historic properties pursuant to Stipulation IX;

14 **WHEREAS**, this Agreement was developed with appropriate public involvement pursuant to 36
15 CFR § 800.2(d) and § 800.6(a)(4); the public involvement was coordinated with the public
16 review of the Draft Environmental Impact Statement developed by FTA and Sound Transit to
17 comply with National Environmental Policy Act (NEPA), as amended, pursuant to 36 CFR §
18 800.8(a);

19 **WHEREAS**, public involvement in the Section 106 review process, including notification of the
20 Project's Adverse Effects to known historic properties pursuant to 36 CFR § 800.6(a)(3),
21 following the publication of the NEPA Environmental Impact Statement (EIS) and these
22 provisions shall be coordinated through public communication methods in a way that is
23 commensurate with the type and scale of public input being sought pursuant to Stipulations VIII
24 and IX;

25 **WHEREAS**, FTA in coordination with Sound Transit shall continue to consult with DAHP,
26 Consulting Tribes, and other Consulting Parties under the terms of this Agreement until such
27 time as FTA determines that all the activities subject to this Agreement are completed or the
28 Agreement is terminated pursuant to Stipulation XXIII;

29 **NOW, THEREFORE**, FTA, Sound Transit, and DAHP agree that the Project shall be
30 implemented in accordance with the following stipulations in order to resolve the effects of the
31 Project on historic properties.

32 **STIPULATIONS**

33 FTA, in coordination with Sound Transit, shall ensure that the following measures are carried
34 out:

35 **I) Applicability**

- 36 A. If Sound Transit applies for additional federal funding or approvals for the Project
37 from a federal agency that is not party to this Agreement, the agency may choose to
38 remain individually responsible for their Project under 36 CFR Part 800. Alternatively,
39 if the Project as described herein remains unchanged, such funding or approving
40 agency may request in writing to FTA and DAHP of their desire to designate FTA as
41 lead federal agency for the Project pursuant to 36 CFR § 800.2(a)(2) and to become
42 a Consulting Party to this Agreement pursuant to Paragraph B of this stipulation.
43 B. If during the implementation of this Agreement, FTA identifies other agencies, tribes,
44 individuals, and organizations with a demonstrated interest in the Project due to the
45 nature of their legal or economic relation to the Project or affected properties, or due
46 to their concern with the Project's effects on historic properties, FTA may offer such

1 entities Consulting Party status pursuant to 36 CFR § 800.2(c) and/or invite them to
2 become party to this Agreement, with notification to DAHP, Consulting Tribes, and
3 other Consulting Parties.

4 1) If FTA invites an entity to become an Invited Signatory, the party may accept
5 this status by agreeing in writing to the terms of this Agreement and so
6 notifying FTA. If the entity agrees to become an Invited Signatory and DAHP,
7 USACE, and Sound Transit, have no objections, FTA shall follow Stipulation
8 XXII, to amend this Agreement.

9 2) If FTA invites an entity to become a Concurring Party, the entity may accept
10 this status by agreeing in writing to the terms of this Agreement and so
11 notifying FTA. Because Concurring Parties have no responsibility for
12 implementation of this Agreement, FTA may add such parties to the
13 consultation process without formal amendment of this Agreement. FTA shall
14 notify DAHP, Consulting Tribes, and other Consulting Parties of any entities
15 who agree to become a Concurring Party.

16 C. The Project may have multiple construction contracts and design and construction of
17 the Project may be divided up geographically and/or by discipline. For purposes of
18 this Agreement these divisions may be considered independently for consultation
19 pursuant to this Agreement. In these instances, the Project status (e.g., design
20 milestone or construction phase) may be considered specific to the contract or
21 element without applying to the entire Project. DAHP, Consulting Tribes, and other
22 Consulting Parties will be notified regarding divisions of Project contracting and
23 design and/or construction status as the Project advances.

24 D. For the purposes of this Agreement, the use of the term “construction” includes major
25 Project construction, as well as any advanced construction which may include
26 activities such as demolition activities, earthwork, staging, and construction of Project
27 infrastructure and related improvements.

28 **II) Roles and Responsibilities**

29 **A. FTA**

30 As the federal lead agency, the FTA has primary responsibility pursuant to 36 CFR
31 800.2(a)(2) to ensure that the provisions of this Agreement are carried out. FTA shall
32 coordinate with Sound Transit to carry out the terms of this Agreement. FTA will
33 conduct formal consultation with DAHP, Consulting Tribes, and other Consulting
34 Parties. FTA is responsible for all determinations of eligibility and findings of effect of
35 the Project.

36 **B. Sound Transit**

37 As the Project proponent, and as a condition of award of any FTA funding, Sound
38 Transit, in coordination with FTA, shall be primarily responsible for implementing this
39 Agreement and support FTA in fulfilling its Section 106 consultation requirements.
40 Sound Transit will ensure that all cultural resources related work described in this
41 Agreement is performed by Secretary of the Interior (SOI) qualified individuals
42 pursuant to Stipulation III(B) as appropriate.

43 **C. DAHP**

44 DAHP shall be responsible for participating in consultation as set forth in this
45 Agreement and for reviewing Project documentation within the timeframes
46 established in the Agreement. DAHP shall provide comments on APE amendments,
47 and review and concur as appropriate on all FTA determinations and findings
48 pursuant to processes outlined in 36 CFR Part 800 and below.

49 **III) Standards and General Requirements**

- 1 A. All work carried out pursuant to this Agreement shall meet SOI Standards for
2 Archaeology and Historic Preservation (48 FR 44716) and/or the SOI's Standards for
3 the Treatment of Historic Properties (36 CFR Part 68), as applicable (individually or
4 collectively, SOI Standards). Documentation for determinations of eligibility and
5 findings of effect shall meet 36 CFR § 800.11, the SOI Standards, the National Park
6 Service's Bulletins, and DAHP survey and reporting guidance, as appropriate.
7 Documentation of historic properties for the purposes of resolving Adverse Effects
8 under Stipulation IX, will follow the latest version of DAHP published documentation
9 standards or other that is agreed upon in writing by both FTA and DAHP.
- 10 B. FTA shall ensure that all activities conducted pursuant to this Agreement shall be
11 carried out by, or under the direct supervision of, historic preservation professional(s)
12 who meet the SOI's Professional Qualification Standards (48 FR 44738-44739) in
13 the appropriate field(s) for the activity (SOI-Qualified Professionals). Sound Transit
14 shall ensure that consultants retained for services pursuant to implementation of this
15 Agreement are SOI-Qualified Professionals, or in the instance of other allied
16 professions not covered by the SOI's Professional Qualification Standards, they shall
17 meet other nationally recognized standards or licensure/certification requirements for
18 the profession, as applicable.
- 19 1) SOI-Qualified Professionals shall recognize and integrate tribal knowledge
20 and expertise in the identification of NRHP-places of religious and cultural
21 significance to the Tribes, the assessment of Program effects to these
22 historic properties, and the identification of measures to avoid, minimize, or
23 mitigate any adverse effects to these historic properties.
- 24
- 25 C. The signatories to this Agreement acknowledge that information about historic
26 properties, potential historic properties, or properties considered historic for purposes
27 of this Agreement are or may be subject to the provisions of state law (Revised Code
28 of Washington (RCW) 42.56.300) and federal law (Section 304 of the National
29 Historic Preservation Act). Sensitive cultural resources information is defined as
30 information about the location, character, or ownership of a historic property. If it is
31 determined that disclosure may cause a significant invasion of privacy, risk harm to a
32 historic property, impede the use of a traditional religious site by practitioners, or
33 contain archaeological site description or location information, sensitive cultural
34 resources information shall be excluded from all public documents. Unredacted
35 documents that contain sensitive cultural resources information shall only be
36 accessed by approved personnel or SOI-Qualified Professional, as defined the
37 Secretary of Interior's Professional Qualifications Standards (36 CFR Part 61).
- 38 D. FTA, in coordination with Sound Transit, shall ensure that all collections, consisting of
39 artifacts, samples, notes, maps, photographs, and other materials and documents
40 associated with archaeological investigations conducted pursuant to this Agreement,
41 will be curated pursuant to Stipulation XIX, Collection and Curation, of this
42 Agreement and as detailed in Attachment C.
- 43 E. FTA and Sound Transit shall transmit all site forms, reports, and other documentation
44 associated with investigations and findings to DAHP through the Washington
45 Information System for Architectural and Archaeological Records Data (WISAARD),
46 unless otherwise noted at the request of the Consulting Tribes or other Consulting
47 Parties. Further, this Agreement stands in lieu of a Washington State Archaeological
48 Excavation Permit as per RCW 27.53.
- 49 F. FTA shall honor the request of any Consulting Tribe for direct government-to-
50 government consultation regarding the Project.

- 1 G. FTA, in coordination with Sound Transit, anticipates continued consultation at regular
2 intervals (e.g., monthly) but at least quarterly with DAHP, Consulting Tribes, and
3 other Consulting Parties to implement and report on implementation of stipulations of
4 this Agreement. Such consultation meetings may be held in-person, on-line or in a
5 hybrid format. Such meeting cadence may be adjusted throughout the life of this
6 Agreement. FTA will notify DAHP, Consulting Tribes, and other Consulting Parties of
7 adjustments in meeting cadence via email. Meetings will continue through the
8 completion of commitments in this agreement.
- 9 H. Definitions in 36 CFR § 800.16 will be used for the purposes of this Agreement.
10 Additional terminology is included below:

11 1) Signatory

12 In accordance with 36 CFR § 800.6(c)(1), a signatory has the sole authority
13 to execute, amend, or terminate the agreement. The federal agency and
14 the SHPO/THPO are signatories; the ACHP is a signatory as well when it
15 has participated in consultation for the agreement and in all program PAs.
16 Except as described below, their signature is almost always required for the
17 agreement to go into effect. Once all of the signatories have signed the
18 agreement, it is executed and goes into effect. Signatories to this
19 agreement are FTA and DAHP.

20
21 2) Invited Signatory

22 In accordance with 36 CFR § 800.6(c)(2), an invited signatory, upon
23 signing, has the authority to amend and terminate the agreement. The
24 agency official may invite additional parties to sign the agreement, such as
25 an Indian tribe or NHO who attaches religious and cultural significance to
26 historic properties affected by the undertaking (off tribal lands), or any party
27 that assumes a responsibility under the agreement. The refusal of an
28 invited signatory to sign the agreement does not prevent the agreement
29 from being executed; however, an agreement cannot impose a duty or
30 responsibility on a party that has not signed it. When an Indian tribe or NHO
31 is asked to be an invited signatory to an agreement for which the
32 undertaking will not occur on or affect historic properties on tribal lands, the
33 THPO or a representative designated by the tribe or NHO, as the case may
34 be, can sign the agreement on behalf of the tribe or NHO. The ACHP notes
35 and accepts that some tribes may decline to sign agreement documents in
36 principle but may participate in development of the agreement. Such
37 decisions are within the rights of Indian tribes, and the ACHP recommends
38 that agencies understand and accept such decision. Invited Signatories to
39 this agreement are Sound Transit.

40
41 3) Concurring Party

42 In accordance with 36 CFR § 800.6(c)(3), a concurring party is a
43 consulting party invited to concur in the agreement document but who
44 does not have the authority to amend or terminate the agreement. Like
45 an invited signatory's signature, a concurring party signature is not
46 required to execute the agreement; a concurring signature is essentially
47 an endorsement of the agreement. Thus, the refusal to sign by any
48 party asked to concur in the agreement does not prevent the agreement
49 from being executed. Whether any or all other Consulting Parties are
50 invited to concur in an agreement is at the federal agency's sole
51 discretion. Extending the offer to sign an agreement as a concurring

1 party may be an effective way of recognizing the assistance and
2 support that a party has provided for the actions being evidenced in the
3 agreement and encouraging their ongoing support.
4

5 The individual who signs the agreement on behalf of any invited
6 signatory or concurring party should be one with approval authority for
7 any responsibilities or duties assumed under the agreement, or
8 authority to represent the broad interests of their organization, as the
9 case may be.
10

11 4) Consulting Tribes

12 Consulting Tribes refers to Tribes included in formal Section 106
13 consultation and included in development of this Agreement. For the Project
14 these Tribes are federally recognized Tribes identified above.
15

16 5) Consulting Parties

17 Consulting Parties in this Agreement refers to additional consulting parties
18 as defined in 36 CFR 800.2(c)(5) "Certain individuals and organizations
19 with a demonstrated interest in the undertaking may participate as
20 consulting parties due to the nature of their legal or economic relation to the
21 undertaking or affected properties, or their concern with the undertaking's
22 effects on historic properties." as well as representatives of local
23 governments as defined in 36 CFR 800.2(c)(3) "A representative of a local
24 government with jurisdiction over the area in which the effects of an
25 undertaking may occur is entitled to participate as a consulting party. Under
26 other provisions of Federal law, the local government may be authorized to
27 act as the agency official for purposes of section 106."
28

29 **IV) Deliverables and Review Procedures**

- 30 A. FTA shall provide the DAHP, Consulting Tribes and other Consulting Parties thirty
31 (30) calendar days to comment on all findings, determinations, documents, and
32 deliverables unless otherwise specified.
33 B. For all findings, determinations, documents, and deliverables submitted during
34 Project construction and directly related to construction activities, DAHP, Consulting
35 Tribes, and other Consulting Parties shall have five (5) business days to review and
36 provide comments, unless otherwise specified.
37 C. If the deliverable is a draft document, any written comments provided within the
38 review and comment period shall be considered in the preparation of the final
39 document. If there are any comments that are not feasible to incorporate into the
40 final document, FTA shall provide an explanation to DAHP, Consulting Tribes, and
41 other Consulting Parties as part of issuing the final document. If no comments on a
42 draft document are provided within the specified review timeframe, FTA, at its
43 discretion, may consider the draft document final with notification to DAHP,
44 Consulting Tribes, and other Consulting Parties.
45 D. Should FTA and DAHP be unable to reach agreement on eligibility determinations,
46 findings of effect, or resolution of Adverse Effects, FTA shall consult with DAHP to
47 resolve the disagreement in accordance with Stipulation XXI.
48 E. All review timeframes may be extended by mutual consent between FTA and DAHP,
49 with notification to other Consulting Tribes and Consulting Parties. Failure of any

Consulting Party to respond within the specified timeframe shall not preclude FTA from proceeding to the next step of any process under this Agreement.

V) Project Design Development and Review

- A. The Project plans (e.g., drawings specifications, special provisions, appendices, etc.), including plans for temporary construction-related work, shall effectively meet the Project purpose and need, while avoiding, minimizing, and/or mitigating Adverse Effects to historic properties. Project plans analyzed for development of this Agreement have been developed to approximately 10% design.
- B. At its own discretion, including in response to the request of a Consulting Party, FTA in coordination with Sound Transit, may convene a meeting(s) or use other appropriate means to obtain Consulting Party input on Project design development and effects of the Project on historic properties. If a meeting is held, FTA or Sound Transit shall distribute materials as appropriate in advance of the meeting. These meeting materials may include but are not limited to, agendas, Project plans, and effects assessments. DAHP, Consulting Tribes, and other Consulting Parties may provide input in writing following the receipt of materials during the specified review time and/or during the meeting, if one is held, or both. FTA in coordination with Sound Transit shall record and consider all Consulting Party input received pursuant to this stipulation as Project plans are further developed.
- C. Sound Transit shall review Project plans at design milestones (e.g., 30, 60, 90, and 100%), or equivalent design stages. Sound Transit shall also review any modifications made to the 100% Plans, whether those changes are made prior to, or during Project construction. If a modification of the 100% plans is within the vicinity of a historic property, Sound Transit shall not allow any destructive activities related to the Project modification to begin until reviews under this stipulation and Stipulation VIII are complete. Any submittals to DAHP, Consulting Tribes, and other Consulting Parties shall follow review times as outlined in Stipulation IV. To facilitate review, submittals may be limited to the portions of the Project plans that illustrate the portion of the Project which would potentially adversely affect the previously identified historic properties in Attachment B.
 - 1) At each stage of the review, Sound Transit shall recommend to FTA whether revisions are necessary to the APE pursuant to Stipulation VI.
 - 2) If the APE is revised, survey and inventory for historic properties shall occur within the newly added portion of the APE pursuant to Stipulation VII.
 - 3) Upon completion of the 30%, 60%, 90%, and 100% plans and in addition to the APE review, pursuant to Paragraph C(1) of this stipulation, Sound Transit shall prepare an assessment of the effects pursuant to Stipulation VIII for submittal along with the appropriate plans to DAHP, Consulting Tribes, and other Consulting Parties. Based on the nature and scale of the Project changes since the prior design milestone, FTA, at its discretion, may hold a consultation meeting pursuant to Paragraph B of this stipulation. On behalf of FTA, Sound Transit shall assess whether any Project design changes would result in a change to FTA's finding of effect prepared pursuant to Stipulation VIII have been met and whether the plans incorporate previous commitments made to DAHP, Consulting Tribes, and other Consulting Parties, including those made as part of any Mitigation Plan(s) prepared under Stipulation IX.
 - a. If the previously made finding of effect remains valid, design-related requirements have been met, and all commitments reached during consultation have been incorporated into Project design, Sound

Transit shall notify FTA, who shall notify DAHP, Consulting Tribes, and other Consulting Parties of its findings.

- b. If the previously made finding of effect is no longer valid, design-related requirements have not been met, or if commitments reached during consultation are not incorporated into the Project plans at subsequent stages of design development, FTA shall make a new finding of effect in coordination with Sound Transit pursuant to this stipulation, and proceed to Stipulation IX, if necessary.

- D. Potential Construction Management Plans requiring Consulting Party review may include but are not limited to: haul routes, construction staging, noise, lighting and glare, vibration, installation of landscaping, natural and/or cultural resources mitigation where Adverse Effects to historic properties are possible. As design on the project advances, potential effects to historic properties will be regularly assessed pursuant to Stipulation VIII. As such, the design and construction contractors are anticipated to develop control plans for these effects. FTA and Sound Transit will share these plans with DAHP, Consulting Tribes, and other Consulting Parties.

These plans will be reviewed pursuant to IV. Anticipated plans include:

- 1) Hauling plan(s)
- 2) Construction staging
- 3) Noise
- 4) Lighting and glare
- 5) Vibration monitoring
- 6) Landscaping
- 7) Natural resource mitigation plans

VI) Area of Potential Effects

- A. In accordance with 36 CFR § 800.4(a)(1) and in consultation with DAHP, Consulting Tribes, and other Consulting Parties, FTA has defined the APE for the Project (Attachment A).
- B. Through the Project design process, and as needed during Project construction, FTA in coordination with Sound Transit, shall determine if revisions to the APE are necessary.
- 1) If FTA, in coordination with Sound Transit, determines that the APE requires revision it shall submit the APE revision along with any supporting documentation to DAHP for review and comment, and to Consulting Tribes and other Consulting Parties (as appropriate) for review, pursuant to Stipulation V. FTA's determination on the revised APE shall be final.
 - 2) Revisions to the APE do not require a formal amendment to this Agreement. If revised and documented by FTA pursuant to Paragraph B(1) of this stipulation, then the revised APE shall be used through the remainder of the Project unless further revisions to the APE are necessary.
- C. If any new, previously unsurveyed, areas are added to the APE, the procedures in Stipulation VII shall be followed to identify historic properties that may be affected by the Project.

VII) Survey and Evaluation

- A. Sound Transit in coordination with FTA and in consultation with DAHP, Consulting Tribes, and other Consulting Parties, shall conduct surveys of the APE, including any areas added through revisions under Stipulation VI, in order to undertake and complete a reasonable and good faith effort to identify historic properties.

- 1) Surveys may occur across the Project at different intervals depending on the design and/or construction milestone and may be phased to meet project needs.
 - 2) Sound Transit shall advise FTA if and when additional survey is necessary. In any instance where a property cannot be fully evaluated prior to the initiation of the Project's construction or the resumption of Project activities in the vicinity of the property when identified pursuant to this stipulation, the property may be treated as though it is eligible for inclusion in the NRHP for the purposes of Section 106 review of the Project only. In these instances, and in addition to providing a justification for not performing a full evaluation, FTA shall document the NRHP criterion or criteria, potential area(s) of significance, and boundaries used to assume the property's eligibility so that this information can be used to assess effects of the Project on the historic property pursuant to Stipulation VIII.
 - 3) The survey and evaluation shall be performed by SOI-Qualified professionals appropriate to the resource type(s) being identified and evaluated and shall meet the requirements of Stipulation III.
 - 4) Archaeological surveys will be conducted as described in Stipulation XVI.
- B. Sound Transit shall review the survey results and make NRHP eligibility recommendations to FTA, which shall submit its NRHP eligibility determinations to DAHP, Consulting Tribes, and other Consulting Parties for review and comment pursuant to Stipulation IV. Subject to the confidentiality requirements pursuant to Stipulation III.C, Sound Transit shall post the survey results on the Project website or other publicly accessible electronic platform as appropriate, in order to obtain public input and shall share any comments received from the public with DAHP, Consulting Tribes, and other Consulting Parties. Such documentation will be redacted to not disclose sensitive archaeological information or Tribal knowledge.
- 1) If DAHP does not respond during the applicable review period or if DAHP concurs, FTA's eligibility determination shall become final and effects to historic properties shall be assessed pursuant to Stipulation VIII.
 - 2) If FTA and DAHP do not agree on NRHP eligibility of a property, or if FTA and a Tribe that attaches religious and cultural significance to a property do not agree on NRHP eligibility, FTA shall resolve the disagreement pursuant to Stipulation XXI.

VIII) Assessment of Effects on Historic Properties

- A. FTA, in coordination with Sound Transit, shall update a finding of effect for individual historic properties in the APE based on the Project's 30% plans, or as necessary after the 30% plans have been reviewed, to account for any subsequent changes in the Project design that may result in newly identified historic properties or changes in the finding of effect for a historic property. Sound Transit shall assess effects of the Project on historic properties in accordance with the Criteria of Adverse Effect as described in 36 CFR § 800.5(a)(1) and make a recommendation to FTA, supported by documentation that meets the requirements of Stipulation III(A). Sound Transit shall also recommend to FTA potential measures for avoiding, minimizing, and/or mitigating any Adverse Effect(s). FTA shall review Sound Transit's assessment of effects and recommendations, and if appropriate, submit a finding of effect to DAHP, Consulting Tribes, and other Consulting Parties for review pursuant to Stipulation IV. FTA shall clearly state any condition(s) imposed on the Project as part of the finding. Subject to the confidentiality requirements pursuant to Stipulation III.C, Sound Transit shall post the finding of effect on the Project website, or other means as appropriate,

1 in order to obtain public input and shall share any comments received from the public
2 with DAHP, Consulting Tribes, and other Consulting Parties within the review
3 timeframe.

4 1) If FTA makes a finding of No Adverse Effect and no conditions are needed
5 to avoid or minimize effects, FTA will notify DAHP, Consulting Tribes and
6 other Consulting Parties.

7 a. If FTA makes a finding of No Adverse Effect and DAHP, Consulting
8 Tribes, and other Consulting Parties agree, no further consultation is
9 required pending implementation of any conditions upon which the finding
10 is based (e.g. measures to avoid or minimize effect). Implementation of
11 conditions shall be tracked as part of quarterly reporting outlined in
12 Stipulation XVII.

13 b. As part of the assessment of effects, Sound Transit may recommend,
14 and FTA may impose, conditions on the Project to avoid or minimize an
15 Adverse Effect to a historic property. Conditions to protect a historic
16 property during Project construction shall be considered to avoid and/or
17 minimize potential Adverse Effects and follow Stipulation IX.

18 2) If FTA makes a finding of Adverse Effect and DAHP, Consulting Tribes, and
19 other Consulting Parties agree, all parties shall consult to resolve the
20 Adverse Effects as prescribed in Stipulation IX.

21 3) If DAHP, Consulting Tribes, and other Consulting Parties do not agree with
22 FTA's finding of effect, they shall provide comments to FTA specifying the
23 reasons for their disagreement. FTA shall consult with DAHP, Consulting
24 Tribes, and other Consulting Parties (as appropriate) to resolve the
25 disagreement in accordance with Stipulation XXI.
26

27 **IX) Resolving Adverse Effects**

28 A. FTA shall consult with DAHP, Consulting Tribes, and other Consulting Parties (as
29 appropriate) and the owner of the historic property, if appropriate, to seek and
30 consider other measures to avoid, minimize, and/or mitigate the Adverse Effect. The
31 consultation must include an opportunity for the public to express their views in
32 resolving the Adverse Effect(s). FTA, at its discretion, may determine that public
33 participation under this stipulation is met via public review and comment conducted
34 under the National Environmental Policy Act, as amended, and its implementing
35 regulations.

36 1) Consultation to resolve adverse effects may include

37 a. Individual and/or meeting series among FTA, Sound Transit and
38 other parties as appropriate for the resource and adverse effect.
39 appropriate parties

40 b. Consultation at regularly occurring meetings as described in
41 Stipulation XVIII.

42 2) Sound Transit and FTA may provide mitigation measure recommendations,
43 however mitigation measures will be developed and finalized in consultation
44 with DAHP, Consulting Tribes and other Consulting Parties (as appropriate).

45 B. FTA, in coordination with Sound Transit, shall develop a Mitigation Plan(s) to
46 document the measures identified through consultation under Paragraph A of this
47 stipulation to resolve the Adverse Effect(s). Mitigation Plan(s) may be prepared for

1 the Project as a whole, for individual construction bid packages, and/or for individual
2 or groups of historic properties, as needed.

- 3 1) A Mitigation Plan shall outline measures to avoid, minimize, and/or mitigate
4 Adverse Effects to the historic property. These may include, but are not
5 limited to, additional design review pursuant to Stipulation V or protective
6 measures to avoid or minimize construction and/or operational impacts to
7 historic properties. When applicable, deliverables required by a Mitigation
8 Plan shall be prepared in accordance with the requirements of Stipulation III
9 and shall be submitted and reviewed pursuant to the timeline(s) and process
10 outlined in Stipulation IV, or as otherwise specified in the Mitigation Plan.
 - 11 a. Final measures identified to avoid, minimize, and or mitigate
12 Adverse Effects will be documented and made available for
13 review and comment by the public via the project website or
14 other accessible information portal. Such information is subject
15 to the confidentiality requirements pursuant to Stipulation III.C.
- 16 2) FTA shall submit a draft and final Mitigation Plan to DAHP, Consulting Tribes,
17 and other Consulting Parties (as appropriate), and the property owner, when
18 applicable, pursuant to Stipulation IV. The Mitigation Plan shall be considered
19 final following agreement in writing by both FTA and DAHP. Development,
20 finalization, and implementation of Mitigation Plan do not require a formal
21 amendment to this Agreement. Implementation of the Mitigation Plan shall be
22 tracked as part of quarterly reporting outlined in Stipulation XVIII.
- 23 3) If FTA and DAHP fail to agree on how to resolve the Adverse Effect, FTA shall
24 consult with DAHP to resolve the disagreement in accordance with
25 Stipulation XXI.
- 26 4) If required by a Mitigation Plan, construction activities may not begin or
27 resume in the vicinity of the historic property until after completion of the
28 associated field work or implementation of protection measures outlined in
29 the Mitigation Plan.
- 30 5) For newly identified Adverse Effects, Sound Transit, in coordination with FTA,
31 will populate an Adverse Effect acknowledgement form (Attachment C) which
32 will identify the nature of the historic property that is adversely affected, the
33 nature of the Adverse Effect,. The adverse effect acknowledgement form shall
34 be signed by FTA and DAHP but may be signed by invited signatories, as
35 appropriate. An Adverse Effect acknowledgment form will be developed by
36 FTA in coordination with Sound Transit and in consultation with DAHP.

37 **X) Construction Protection Plan for Historic Properties**

38 There are cases where historic properties are located within the APE, but FTA has made
39 a finding of No Adverse Effect (Attachment B). When applicable, the following
40 procedures are set forth to protect such historic properties during construction.

- 41 A. Sound Transit in coordination with FTA, and in consultation with DAHP, Consulting
42 Tribes, and other Consulting Parties, and the property owner, when applicable, shall
43 develop a Construction Protection Plan for Historic Properties (CPPHP) detailing the
44 measures to be implemented prior to and during Project construction to avoid or
45 minimize effects to historic properties. The CPPHP may also include measures to
46 assess effects of operations during systems testing and revenue service as
47 appropriate. The CPPHP shall also identify the entity(ies) responsible for carrying out
48 the measures included in the CPPHP.

- 1) The CPPHP may be prepared for the Project as a whole, for individual construction bid packages, and/or for individual or groups of historic properties, as needed.
 - 2) Sound Transit shall submit the draft CPPHP(s) to FTA for review and approval. Once FTA's comments are incorporated, FTA shall submit the draft and final CPPHP(s) to DAHP, Consulting Tribes, and other Consulting Parties pursuant to Stipulation IV. If the CPPHP includes any property-specific protection measures, FTA shall also submit the draft and final CPPHPs to the owner of the historic property pursuant to Stipulation IV. The CPPHP shall be considered final upon acceptance by FTA and shall be distributed to DAHP, Consulting Tribes, other Consulting Parties, and the property owner, when applicable. When necessary, amendments to the CPPHP shall follow the same process as its original development.
- B. Sound Transit shall include the agreed-upon CPPHP in contract packages to inform Project Construction Contractors of their responsibilities relative to historic properties. The CPPHP may be a separate document or combined with other Project construction monitoring plans, as appropriate. Sound Transit shall incorporate the property-specific protection measures into the Project plans, when appropriate, and shall ensure the terms of the CPPHP(s) are implemented.
- C. Depending on the type of historic property, the expected effects, and the conditions or Mitigation Plan(s) as written, Sound Transit may include the following measures in the CPPHP:
- 1) Construction Protection Measures (CPMs) that detail the specific protection measures and procedures to be implemented during Project construction to protect historic properties.
 - 2) Historic Property Inspections (pre-, during, and post-construction) that provide a baseline of existing structural and physical conditions to facilitate identification and documentation of any structural and/or cosmetic damage caused by Project construction. Inspection reports will be shared with DAHP, Consulting Tribes, and other Consulting Parties. Inspections shall include, but are not limited to, building/structure foundations, exterior and interior elements, topography, landscaping, and any other historically significant or character-defining features of the property to document any pre-existing defects or other damage. Inspection documentation shall include photographs and narrative to document the observed conditions before and after Project construction, and as needed during Project construction. Depending on the type and nature of the historic property and anticipated effects to it, photographic documentation should include, but is not limited to: ceilings, roofs, exterior and interior walls, windows, masonry, foundations, all sides of the exterior of the building, structure and bridge wingwalls, beams, substructures and superstructures, plumbing, equipment, fences and landscape walls, topography, vegetation, driveways and sidewalks, and any historically significant or character-defining features of the property. Photographs shall be appropriately detailed and in focus, properly composed, and with adequate lighting to clearly show existing conditions such as deterioration and cracking that may be subject to dispute after initiation of Project construction. Every attempt shall be made to take photographs that document overall condition from the same location before, during, and after construction, as appropriate.
 - 3) Vibration Management and Remediation Measures (VMRMs) to address ground-borne vibration caused by Project construction when it is projected to

1 have a moderate to severe impact under FTA's noise and vibration impact
2 criteria that may result in an Adverse Effect on a historic property. Methods
3 and durations for vibration management are anticipated to be included in the
4 project construction management plan addressing vibration and may be
5 integrated into the CPPHP, as appropriate.

- 6 4) Other types of potential measures may include but are not limited to:
7 maintenance of property access and noise minimization and mitigation
8 measures when noise caused by Project construction and/or operations is
9 anticipated to have an Adverse Effect on a historic property. Methods and
10 durations for other types of monitoring and impact management are
11 anticipated to be included in the project construction management plan
12 addressing those potential impacts and may be integrated into the CPPHP,
13 as appropriate.

14 **XI) Unanticipated Effects to Known Historic Properties**

- 15 A. If previously known historic properties are affected in an unanticipated manner (e.g.,
16 damaged, destroyed, or otherwise harmed in an accidental, unexpected, or
17 unforeseen manner; including the possibility of unanticipated noise or vibration
18 impacts) during Project construction, all activities shall cease within a restricted zone
19 to avoid and/or minimize harm to the property. The restricted zone will generally be
20 50 feet or appropriate distance, based on sensitivity of the resource and to be
21 determined in coordination with the appropriate SOI-qualified cultural resources
22 specialist as described in Stipulation III.A. Sound Transit shall include in Project
23 construction contracts a requirement for the Project Construction Contractor to
24 immediately notify Sound Transit of the effect and implement interim measures to
25 protect the property from damage, looting, and vandalism. Measures may include,
26 but are not limited to: protective fencing, covering of the property with appropriate
27 materials, and/or posting of security personnel. The Project Construction Contractor
28 shall not resume work within the restricted zone until notified by Sound Transit.
29 Sound Transit shall immediately notify FTA. FTA shall then notify DAHP, other
30 Consulting Parties, and the property owner within 24 hours. Sound Transit shall
31 ensure a historic property inspection as described in Paragraph C of this stipulation
32 is prepared as soon as practicable to document damage to the historic property.

33 Unanticipated effects may include but are not limited to:

- 34 1) Physical damage that occurs as a result of equipment striking a historic
35 property
36 2) Unanticipated noise, vibration, or other impacts beyond those considered in
37 the adverse effects analysis and Section 106 technical report for the
38 Project.
- 39 B. If reasonably convenient and appropriate, Sound Transit, DAHP, Consulting Tribes,
40 other Consulting Parties (as appropriate) and the property owner, when applicable,
41 shall confer at the site within forty-eight (48) hours of notice of discovery to assess
42 the property, determine the likely Project effects to the property, and to determine the
43 most appropriate course of action to repair any damage, if feasible.
- 44 1) The course of action shall specify the type of repair, the review process for
45 the scope of work, and the responsibilities for ensuring repairs are made
46 appropriately, including preparation of a post-construction historic property
47 inspection as described in Paragraph C(2) of this stipulation. The course of
48 action shall also outline where and when it may be safe to resume
49 construction activities within and/or in the vicinity of the historic property.

1 Whenever possible, measures to repair historic properties shall be developed
2 so that they meet the SOI Standards and are carried out under the direct
3 supervision of personnel that meet the requirements described in
4 Stipulation III.

- 5 2) Within forty-eight (48) hours of the meeting, Sound Transit shall prepare draft
6 meeting notes documenting the results of the onsite meeting and a draft of
7 the proposed course of action and provide them, and the historic property
8 inspection prepared under Paragraph A of this stipulation, to meeting
9 attendees for review. Attendees of the meeting have forty-eight (48) hours to
10 review draft meeting notes, proposed course of action, and provide
11 comments to Sound Transit. Sound Transit shall finalize the meeting notes
12 and course of action within twenty-four (24) hours after receiving comments
13 and provide them to meeting attendees and FTA.

- 14 C. Once a course of action to repair the damage and further protect the property has
15 been developed and consented to by the Project Construction Contractor and the
16 property owner, FTA in coordination with Sound Transit shall assess effects pursuant
17 to Stipulation VIII. FTA shall review Sound Transit's assessment of effects and
18 recommendations, and if acceptable, submit a finding of effect to DAHP, Consulting
19 Tribes, and other Consulting Parties for review pursuant to Stipulation IV. If
20 necessary, FTA shall resolve any Adverse Effects pursuant to Stipulation IX.

- 21 1) When unanticipated effects (e.g., damage) occur to a known or newly
22 identified historic property during Project construction, Sound Transit shall
23 use the following guidance in addition to the Criteria of Adverse Effect when
24 making a recommendation to FTA;
25 a. If the damage does not constitute an Adverse Effect as described in
26 36 CFR 800.5(a)(1), a No Adverse Effect finding shall be
27 recommended.
28 b. If the damage does constitute an Adverse Effect as described in 36
29 CFR 800.5(a)(1), is repairable, and the property owner agrees to
30 repairing the damage in accordance with the SOI Standards, the
31 Adverse Effect will be resolved pursuant to Stipulation IX.
32 c. If any of the following are true, an Adverse Effect finding requiring
33 resolution under this stipulation shall be recommended:
34 i. The damage involves a National Historic Landmark;
35 ii. The damage cannot be repaired;
36 iii. The historic property must be demolished in whole or in
37 part;
38 iv. The property owner does not consent to repairing the
39 damage in accordance with the SOI Standards;
40 v. Either the Project Construction Contractor or Contractor's
41 insurer resolves the damage claim by monetary payment
42 to the property owner in lieu of a repair; or
43 vi. The repairs have the potential to cause additional Adverse
44 Effects.

45 **XII) Identification and Evaluation of Archaeological Properties**

46 Inventory and evaluation of potential archaeological resources have not been completed
47 for all areas of the Project where ground disturbance may occur. Some areas of
48 expected ground disturbance are on property where access could not be secured prior
49 to acquisition of the property. Some areas of expected ground disturbance are beneath
50 existing infrastructure (buildings, utilities, and other obstructions) that cannot feasibly be

1 removed until construction. Finally, it is possible that design changes could result in
2 additional areas of ground disturbance. The plans described below will be prepared in
3 Consultation with DAHP, Consulting Tribes, and Consulting parties, as appropriate.
4 Survey and evaluation procedures outlined in the plans below will follow processes
5 outlined in Stipulation VI and will follow DAHP standards and guidelines. The plans
6 outlined below are anticipated to be completed within two years of execution of this
7 agreement and will be reviewed by DAHP, Consulting Tribes, and Consulting Parties
8 pursuant to Stipulation IV.

- 9 A. An Archeological Monitoring Plan that specifies the methods and protocols for
10 conducting the archaeological monitoring of construction activities; and
11 B. An Archaeological Treatment Plan (The Treatment Plan) that specifies the methods
12 and protocols for carrying out archaeological investigations for ground disturbing
13 project activities expected to take place prior to and during construction. The plan will
14 include the following elements:
- 15 1) Identifies ground disturbing project elements, describing both vertical and
16 horizontal extent of ground disturbance including a discussion of the nature of
17 spoils produced, as appropriate;
 - 18 2) Provides detail regarding known subsurface geologic conditions including
19 detailed consideration of geoarchaeology based on existing data;
 - 20 3) Identifies specific areas of elevated archaeological probability within the APE;
 - 21 4) Identifies specific ground disturbing elements of the Project within each of the
22 areas of elevated probability;
 - 23 5) Makes recommendations for archaeological investigations based on
24 archaeological sensitivity and anticipated ground disturbance;
 - 25 6) Describes a process for developing and implementing specific work plans for
26 each archaeological investigation and/or archaeologically sensitive area;
 - 27 7) Describes a process for NRHP evaluation of newly identified archaeological
28 resources in consultation with DAHP, Consulting Tribes, and other Consulting
29 Parties (as appropriate);
 - 30 8) Describes a process for assessing effects to newly identified NRHP-eligible
31 archaeological resources in consultation with DAHP, Consulting Tribes, and
32 other Consulting Parties (as appropriate); and
 - 33 9) Identifies laboratory and curation procedures for archaeological resources.

34 **XIII) Consultation to Avoid, Minimize, or Mitigate Adverse Effects on Archaeological**
35 **Resources**

- 36 A. FTA in coordination with Sound Transit and in consultation with DAHP, Consulting
37 Tribes, and other Consulting Parties (as appropriate) will apply the criteria of Adverse
38 Effect (36 CFR § 800.5(a)(1)) to NRHP-eligible archaeological properties within the
39 APE pursuant to Stipulation VIII, and document its findings pursuant to Stipulation IV.
40 B. If FTA determines that the Project will have an Adverse Effect on any NRHP-eligible
41 archaeological resources, FTA, in coordination with Sound Transit, will consult with
42 DAHP, Consulting Tribes, and other Consulting Parties (as appropriate) to explore
43 measures to avoid, minimize, or mitigate Adverse Effects pursuant to Stipulation IX.
44 FTA, in coordination with Sound Transit, will ensure the implementation of any
45 modifications or conditions to avoid or minimize Adverse Effects agreed upon
46 through consultation.
47 C. If Adverse Effects cannot be avoided, mitigation measures will be developed in
48 consultation among FTA, Sound Transit, DAHP, Consulting Tribes, and other
49 Consulting Parties (as appropriate) pursuant to Stipulation IX. Mitigation measures

- 1 may include but are not limited to data recovery, development of interpretive
2 materials including art, and educational information. A Mitigation Plan will be
3 developed to outline agreed upon mitigation pursuant to Stipulation IX(B). Plans may
4 include treatment measures for one or more than one resource and will be subject to
5 review pursuant to Stipulation IV.
6 D. FTA and Sound Transit will continue to consult with Consulting Tribes to address
7 potential effects to Tribally known resources where impacts may not be observable.

8 **XIV) Mitigation for All Demolished Resources**

- 9 A. Sound Transit anticipates demolition of the buildings identified in this stipulation. The
10 timing and specific duration of demolition activities will be determined after execution
11 of this Agreement but will be identified and communicated to DAHP, Consulting
12 Tribes, and other Consulting Parties pursuant to Stipulation VIII. Sound Transit will
13 implement specific mitigation measures identified in Paragraphs B and C of this
14 stipulation for each building that will be demolished:
15 1) 111 Alderwood Mall Boulevard, Lynnwood, WA (WISAARD Property ID
16 729232)
17 2) 2316 47th Street Southeast, Everett, WA (WISAARD Property ID 729197)
18 3) [Additional properties will be identified during completion of the ongoing
19 Section 106 review consultation process]
20 4) [Additional historic properties requiring demolition may be identified through
21 processes outlined in Stipulation V, VI, VII, VIII, and IX]
22 B. Sound Transit will prepare DAHP Level II Documentation for each historic structure
23 to be demolished as listed above under Stipulation XIV. At a minimum this
24 documentation will include historical background information, drawings, maps,
25 photographs, and other information as outlined by DAHP's Mitigation Documentation
26 Standards document. This documentation will be reviewed by DAHP, Consulting
27 Tribes, and other Consulting Parties (as appropriate), pursuant to Stipulation IV. This
28 documentation will be offered to state and/or federal repositories for their archives.
29 This information will also be available for public access via the project website or
30 other accessible information portal.
31 C. Prior to and during the demolition phase(s) of the Project, Sound Transit, to the
32 extent practicable, will work with individuals or entities interested in salvaging raw
33 materials from historic properties being demolished. It is anticipated that Sound
34 Transit will coordinate with local jurisdictions as appropriate for salvage assessments
35 during permitting. Additionally, FTA and Sound Transit, in consultation with DAHP,
36 Consulting Tribes, and other Consulting Parties, will assess the feasibility of this
37 throughout the design phase of the Project.

38 **XV) Historic Utilities**

39 Sound Transit will conduct survey and inventory work consistent with Stipulation VI to
40 identify extant subsurface utilities constructed in or prior to 1980 within the APE that may
41 be encountered during ground disturbing activities related to project construction but not
42 specifically those which may be encountered during design development activities (e.g.,
43 "potholing for utilities"). These historic utilities will be evaluated for NRHP eligibility
44 pursuant to Stipulation VII and effects to those utilities, if any, will be assessed pursuant
45 to Stipulation VIII and resolved pursuant to Stipulation IX. This work may be conducted
46 in stages following design milestones (e.g., 30%, 60%, 90%, 100%). Historic utilities still
47 in use will be documented on historic property inventory forms consistent with DAHP
48 guidance. Abandoned or remnant utilities, no longer in use, will be documented as an
49 archaeological resource and evaluated pursuant to Stipulation VI of this agreement and

1 if they are NRHP eligible consultation to assess and resolve Adverse Effects will follow
2 procedures outlined in Stipulations VIII and IX respectively.

3 **XVI) Inadvertent Discoveries**

- 4 A. Should human remains, funerary objects, sacred objects, or objects of cultural
5 patrimony be discovered at any time prior to or during construction, all ground
6 disturbing activities within at least 50 feet of the discovery location will cease
7 immediately. Sound Transit and its respective contractors shall follow the procedures
8 in the Inadvertent Discovery Plan i(Attachment D)
- 9 B. Should archaeological resources be discovered during construction activities, all
10 ground disturbing work within at least 50 feet of the discovery location will cease and
11 Sound Transit and its respective contractors will follow procedures in the in the
12 Inadvertent Discovery Plan identified in Stipulation XII.A.3.

13 **XVII) Cultural Resources Orientation**

- 14 A. Prior to construction, Sound Transit shall conduct cultural resources orientation to
15 ensure that all construction-related commitments in this Agreement are properly
16 tracked and executed. This orientation will be directed towards Sound Transit
17 contractors and subcontractors assigned to the Project and responsible for
18 overseeing construction. In addition, Sound Transit shall conduct mandatory
19 orientation for the on-site construction managers, supervisors, inspectors, field
20 crews, and archaeological and Tribal monitors, for purposes of awareness and
21 sensitivity to archaeological resources and other cultural resources in the APE.
- 22 B. The purpose of the orientation will be to inform construction management,
23 supervisors, inspectors, and field crews of their role and responsibility to report
24 suspected archaeological resources or human remains encountered during
25 construction activities, and the procedures that must be followed to ensure against
26 further disturbance until the discovery is resolved. The orientation will be based on
27 the process outlined in the Archaeological Treatment Plan per stipulation XII.B () and
28 the project inadvertent discovery plan (Attachment D).
- 29 C. Sound Transit SOL-Qualified persons shall develop the specific content, format, and
30 outcomes of the orientation in consultation with FTA and DAHP, Consulting Tribes,
31 and other Consulting Parties (as appropriate).
- 32 D. The first draft of the orientation program will be developed no later than 180 days
33 after the execution of this Agreement.
- 34 E. Up to 2 (two) drafts of the orientation program will be developed and reviewed by
35 DAHP, Consulting Tribes, and other Consulting Parties pursuant to Stipulation IV.

36 **XVIII) Reviewing and Reporting of Agreement Implementation**

- 37 A. Every three (3) months following the execution of this Agreement and until it expires
38 or is terminated, Sound Transit shall provide FTA, DAHP, Consulting Tribes, and
39 other Consulting Parties a summary report detailing work undertaken pursuant to its
40 terms. Subject to the confidentiality requirements in 54 USC § 307103 and 36 CFR §
41 800.11(c), each report shall include an itemized listing of all measures required to
42 implement the terms of this Agreement. Each report shall also include a timetable of
43 activities proposed for implementation within the following reporting period and, as
44 applicable, notices of the initiation of construction for individual construction bid
45 packages.
- 46 B. DAHP, Consulting Tribes, and other Consulting Parties shall review the reports
47 pursuant to the timelines established in Stipulation IV. Sound Transit shall notify the

- 1 public via the Project website or other publicly accessible format, as appropriate,
2 about the publication of the quarterly reports and that the reports are available for
3 inspection and review upon request. Sound Transit shall share any comments
4 received from the public with DAHP, Consulting Tribes, and other Consulting Parties.
- 5 C. At its own discretion, or at the request of any Signatory, FTA shall convene a meeting
6 to facilitate review and comment on the reports, and to resolve any questions about
7 their content and/or to resolve objections or concerns.
- 8 D. FTA in coordination with Sound Transit will hold annual project meetings for the
9 duration of this agreement and any subsequent extensions with DAHP staff including
10 the State Historic Preservation Officer to share information on the project. Attendees
11 may include technical staff and leadership at FTA, Sound Transit, DAHP, as well as
12 Consulting Tribes and Consulting Parties.

13 **XIX) Collection and Curation**

14 If archaeological resources are collected, and FTA and Sound Transit, in consultation
15 with DAHP, Consulting Tribes, and other Consulting Parties (as appropriate), determines
16 them to be significant and worthy of preservation, and DAHP agrees, any costs
17 associated with the collection, preparation and curation of artifacts shall be the
18 responsibility of Sound Transit. Sound Transit will ensure that collections are
19 accessioned at a facility meeting the requirements of 36 CFR 79, Curation of Federally
20 Owned or Administered Archaeological Collections, unless otherwise indicated by state
21 or local law. Sound Transit and FTA will consult with DAHP, Consulting Tribes, and other
22 Consulting Parties (as appropriate) on facilities for curation. Per Revised Code of
23 Washington (RCW) 27.53, artifacts recovered from private property are the property of
24 the landowner. Disposition of such artifacts recovered during the project will be
25 determined by FTA in consultation with the landowner. Additional information on curation
26 is included in the Treatment Plan (Attachment C).

27 **XX) Duration**

- 28 A. This Agreement shall remain in effect from the date of execution for a period not to
29 exceed ten (10) years unless otherwise extended. If FTA anticipates that the terms of
30 this Agreement shall not be completed within this timeframe, it shall notify DAHP,
31 Consulting Tribes, and other Consulting Parties in writing at least sixty (60) calendar
32 days prior to this Agreement's expiration date. This Agreement may be extended by
33 the written concurrence of the Signatories for a period of up to 10 additional years
34 after the original expiration date.
- 35 B. FTA shall ensure the Agreement is extended if all the stipulations have not been
36 completed. If this Agreement expires and FTA elects to continue with the Project,
37 FTA shall reinitiate Section 106 consultation in accordance with 36 CFR Part 800.
- 38 C. If, prior to the expiration date, FTA determines all the activities subject to this
39 Agreement are completed, including but not limited to implementation of any
40 mitigation measures, then FTA may terminate this Agreement pursuant to
41 Stipulation XXIII.

42 **XXI) Dispute Resolution**

- 43 A. Should any Signatory object at any time to any actions proposed or the manner in
44 which the terms of this Agreement are implemented, FTA shall consult with such
45 party to resolve the objection for a period not to exceed fifteen (15) calendar days.
46 This resolution timeframe may be extended by mutual consent between FTA and the
47 Consulting Party, with notification to the DAHP, Consulting Tribes, and other
48 Consulting Parties.

- 1 B. If FTA and DAHP do not agree on the NRHP eligibility of a property, or if FTA and a
2 Tribe that attaches religious and cultural significance to a historic property do not
3 agree on a property's NRHP eligibility, FTA shall submit documentation to the Keeper
4 of the NRHP and request a formal determination of eligibility pursuant to 36 CFR
5 Part 63 and 36 CFR § 800.4(c)(2). The Keeper's eligibility determination shall be
6 considered final.
- 7 C. If FTA and DAHP, Consulting Tribes, or other Consulting Parties do not agree on
8 findings of effect or resolutions of Adverse Effects, FTA shall forward all
9 documentation relevant to the dispute, including FTA's proposed resolution, to DAHP,
10 Consulting Tribes, and other Consulting Parties and the ACHP.
- 11 1) The ACHP shall provide FTA with its advice on the resolution of the objection
12 within thirty (30) days of receiving adequate documentation. Prior to reaching
13 a final decision on the dispute, FTA shall prepare a written response that
14 takes into account any timely advice or comments regarding the dispute from
15 the ACHP and DAHP, Consulting Tribes, and other Consulting Parties and
16 provide them with a copy of this written response. FTA shall then proceed
17 according to its final decision.
- 18 2) If the ACHP does not provide its advice regarding the dispute within thirty (30)
19 days, FTA may make a final decision on the dispute and proceed accordingly.
20 Prior to reaching such a final decision, FTA shall prepare a written response
21 that takes into account any timely comments regarding the dispute from
22 DAHP, Consulting Tribes, and other Consulting Parties and provide them and
23 the ACHP with a copy of such written response.
- 24 D. FTA's responsibility to carry out all other actions subject to the terms of this
25 Agreement that are not the subject of the dispute shall remain unchanged.
- 26 E. If a member of the public raises an objection in writing pertaining to implementation
27 of this Agreement, FTA shall notify all parties to this Agreement in writing of the
28 objection. Unless otherwise agreed upon, DAHP, Consulting Tribes, and other
29 Consulting Parties have fifteen (15) calendar days to review and provide written
30 comments on the objection to DAHP, Consulting Tribes, and other Consulting
31 Parties. FTA shall consider the objection and take all comments from all parties into
32 consideration in reaching its decision on the objection. Within fifteen (15) calendar
33 days following closure of the comment period, FTA shall render a decision regarding
34 the objection, respond to the objecting party, and proceed according to its decision.
35 FTA's decision regarding resolution of the objection shall be final.

36 **XXII) Amendments**

37 This Agreement may be amended when such an amendment is agreed to in writing by
38 all Signatories and Invited Signatories. The amendment shall be effective on the date of
39 the final signature by the Signatories and Invited Signatories. Copies of any
40 amendments shall be provided to Consulting Tribes and other Consulting Parties and the
41 ACHP.

42 **XXIII) Termination**

- 43 A. If all terms of this Agreement have been completed prior to the expiration date, FTA
44 may terminate the Agreement with notification to Signatories, Invited Signatories, and
45 Concurring Parties that the terms of the Agreement have been completed. If any
46 Signatory or Invited Signatory feels Agreement termination is premature, or that the
47 terms of the Agreement have not been met, they shall respond within the timeframes
48 outlined in Stipulation IV.

1 B. Any Signatory or Invited Signatory may terminate this Agreement by providing at
2 least thirty (30) calendar days' notice to Consulting Tribes and other Consulting
3 Parties. FTA shall consult with the Signatories and Invited Signatories during the
4 thirty (30) calendar day notice period in an attempt to seek agreement on
5 amendments or other actions that would avoid termination.

6 **XXIV) Execution**

7 A. This Agreement may be executed in counterparts, with a separate page for each
8 Signatory, Invited Signatory, and Concurring Party. This Agreement shall become
9 effective on the date of the final signature by the Signatories and Invited Signatories.
10 The refusal of any party invited to concur with this Agreement does not invalidate this
11 Agreement. FTA shall ensure each Consulting Party is provided with a fully executed
12 copy of this Agreement and that the final Agreement, updates to appendices, and
13 any amendments are filed with the ACHP.
14 B. Execution of this Agreement by FTA and DAHP, and implementation of its terms is
15 evidence that FTA has taken into account the effects of its Project on historic
16 properties and has afforded the ACHP opportunity to comment pursuant to Section
17 106 of the National Historic Preservation Act.

18 **XXV) Coordination with Other Federal Reviews**

19 In the event that another federal agency not initially a party to or subject to this PA
20 receives an application for funding/license/permit associated with the Project as
21 described in this PA, that agency may fulfill its Section 106 responsibilities by stating in
22 writing it concurs with the terms of this PA and notifying the FTA, SHPO, and the Council
23 that it intends to do so. The FTA will confirm in writing that the FTA accepts Lead Agency
24 status for Section 106. Such agreement shall be evidenced by implementation of the
25 terms of this PA and attachments.

Signature Page

**PROGRAMMATIC AGREEMENT AMONG THE FEDERAL TRANSIT ADMINISTRATION,
THE WASHINGTON STATE DEPARTMENT OF ARCHAEOLOGY AND HISTORIC
PRESERVATION, AND THE CENTRAL PUGET SOUND REGIONAL TRANSIT AUTHORITY
IMPLEMENTING SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE EVERETT LINK EXTENSION PROJECT, SNOHOMISH COUNTY, WASHINGTON**

Signatory

Federal Transit Administration, Region 10

By: _____

Date: _____

Susan Fletcher (Regional Administrator)

DRAFT

Signature Page

**PROGRAMMATIC AGREEMENT AMONG THE FEDERAL TRANSIT ADMINISTRATION,
THE WASHINGTON STATE DEPARTMENT OF ARCHAEOLOGY AND HISTORIC
PRESERVATION, AND THE CENTRAL PUGET SOUND REGIONAL TRANSIT AUTHORITY
IMPLEMENTING SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE EVERETT LINK EXTENSION PROJECT, SNOHOMISH COUNTY, WASHINGTON**

Signatory

Department of Archaeology and Historic Preservation

By: _____

Date: _____

Allyson Brooks, PhD (State Historic Preservation Officer)

DRAFT

Signature Page

**PROGRAMMATIC AGREEMENT AMONG THE FEDERAL TRANSIT ADMINISTRATION,
THE WASHINGTON STATE DEPARTMENT OF ARCHAEOLOGY AND HISTORIC
PRESERVATION, AND THE CENTRAL PUGET SOUND REGIONAL TRANSIT AUTHORITY
IMPLEMENTING SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE EVERETT LINK EXTENSION PROJECT, SNOHOMISH COUNTY, WASHINGTON**

Invited Signatory

Central Puget Sound Regional Transit Authority

By: _____

Date: _____

Dow Constantine (Chief Executive Officer)

Signature Page

**PROGRAMMATIC AGREEMENT AMONG THE FEDERAL TRANSIT ADMINISTRATION,
THE WASHINGTON STATE DEPARTMENT OF ARCHAEOLOGY AND HISTORIC
PRESERVATION, AND THE CENTRAL PUGET SOUND REGIONAL TRANSIT AUTHORITY
IMPLEMENTING SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE EVERETT LINK EXTENSION PROJECT, SNOHOMISH COUNTY, WASHINGTON**

**ADDITIONAL SIGNTORIES (i.e., Invited or Concurring Parties) to be determined through
consultation among FTA, Sound Transit, DAHP, Consulting Tribes, and Consulting
Parties prior to execution of this Agreement**

Attachment A: Area of Potential Effects

DRAFT

Attachment B: NRHP Eligible and Adversely Affected Known Historic Properties

DRAFT

Attachment C: Adverse Effect Acknowledgement Form

To be developed by FTA and Sound Transit in Consultation with DAHP, Consulting Tribes and Consulting Parties prior to execution of Programmatic Agreement.

DRAFT

Attachment D: Everett Link Extension Inadvertent Discovery Plan

To be developed by FTA and Sound Transit in Consultation with DAHP, Consulting Tribes and Consulting Parties prior to execution of Programmatic Agreement.

DRAFT



Everett Link Extension

ATTACHMENT J

Figures of Historic Built Environment Resources with Potential Adverse Effects

Figures

Figure J1-1	Pioneer First Federal Savings and Loan Association (4111 Alderwood Mall Blvd) – Alternatives ALD-1B, ALD-1B with Alderwood Mall Boulevard Design Option, ALD-2D, ALD-2D with Alderwood Mall Boulevard Design Option, and ALD-2F	1
Figure J1-2	Pioneer First Federal Savings and Loan Association (4111 Alderwood Mall Blvd) – Alternative ALD-2F with Alderwood Mall Boulevard Design Option	2
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Figure J8-7	Everett Bottling Works (3231 Broadway) – Alternative EVT-2C	17
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1 WEST ALDERWOOD SEGMENT

Figure J1-1 Pioneer First Federal Savings and Loan Association (4111 Alderwood Mall Blvd) – Alternatives ALD-1B, ALD-1B with Alderwood Mall Boulevard Design Option, ALD-2D, ALD-2D with Alderwood Mall Boulevard Design Option, and ALD-2F

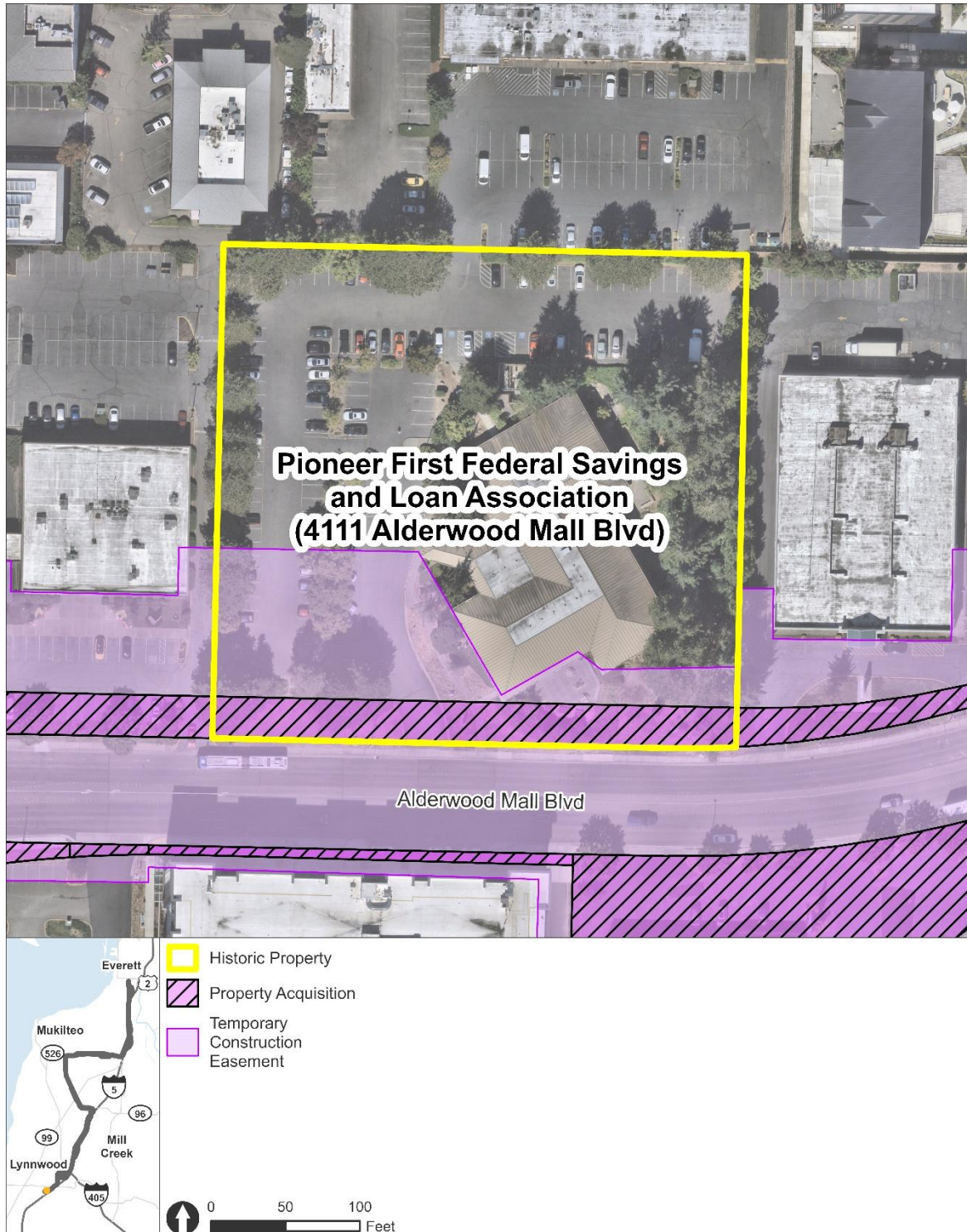


Figure J1-2 Pioneer First Federal Savings and Loan Association (4111 Alderwood Mall Blvd) – Alternative ALD-2F with Alderwood Mall Boulevard Design Option



Figure J1-3 Pacific First Federal Savings and Loan (3220 188th Street SW) – Alternative ALD-2D and ALD-2D with Alderwood Mall Boulevard Design Option

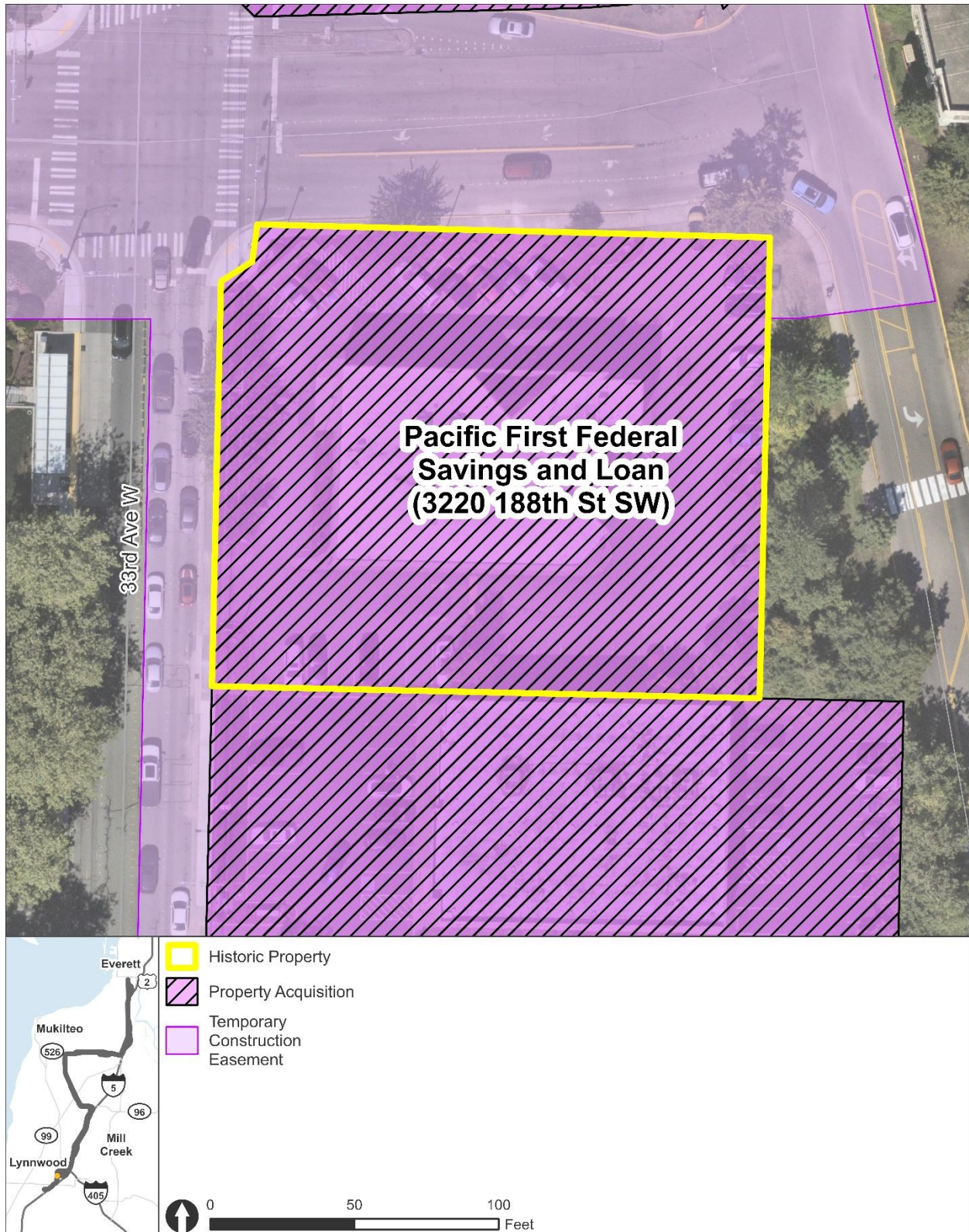


Figure J1-4 Pacific First Federal Savings and Loan (3220 188th Street SW) – Alternative ALD-2F and ALD-2F with Alderwood Mall Boulevard Design Option



2 ASH WAY SEGMENT

None of the alternatives in the Ash Way Segment are anticipated to adversely affect built environment historic properties. Any effects would be associated with proximity to the new guideway, but those effects are not anticipated to be adverse.

3 MARINER SEGMENT

None of the alternatives in the Mariner Segment are anticipated to adversely affect built environment historic properties. Any effects would be associated with proximity to the new guideway, but those effects are not anticipated to be adverse.

4 SR 99/AIRPORT ROAD SEGMENT

None of the alternatives in the SR 99/Airport Road Segment are anticipated to adversely affect built environment historic properties. Any effects would be associated with proximity to the new guideway, but those effects are not anticipated to be adverse.

5 SW EVERETT INDUSTRIAL CENTER SEGMENT

None of the alternatives in the SW Everett Industrial Center Segment are anticipated to adversely affect built environment historic properties. Any effects would be associated with proximity to the new guideway, but those effects are not anticipated to be adverse.

6 SR 526/EVERGREEN SEGMENT

Figure J6-1 House (8102 W Glen Drive) – Alternative EGN-1A

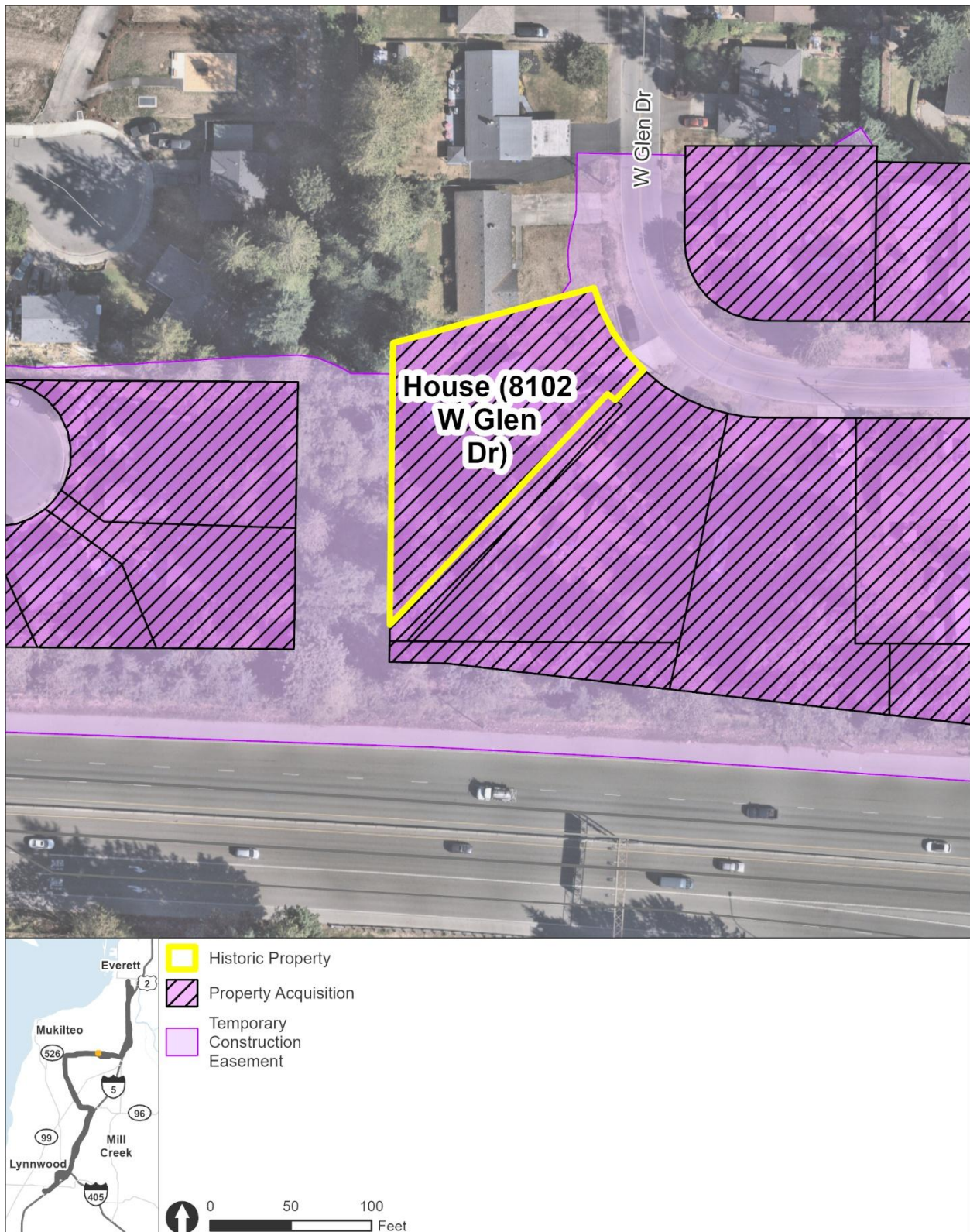
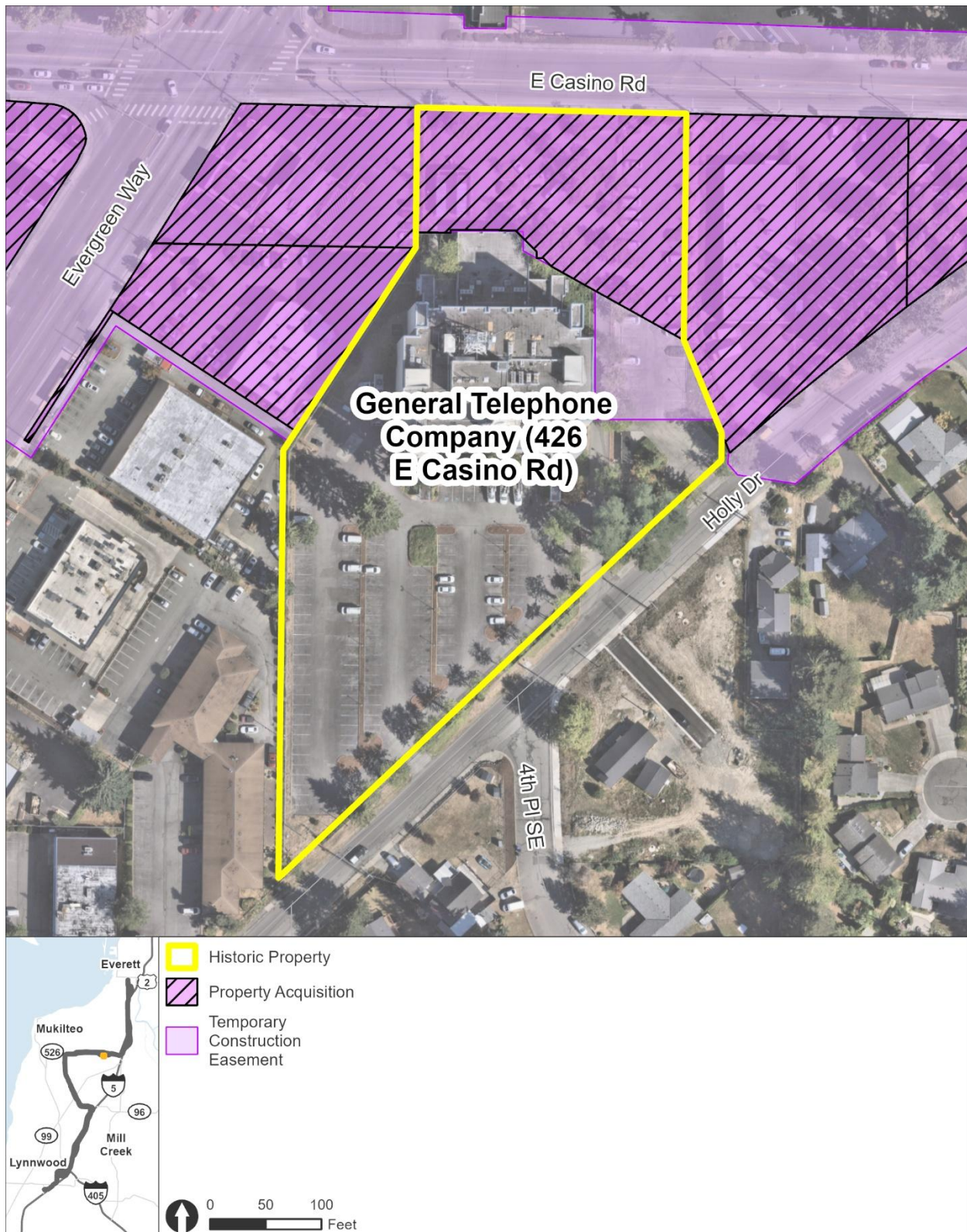


Figure J6-2 General Telephone Company (426 E Casino Road) – Alternatives EGN-3E and EGN-3E with North Side of SR 526 Design Option



7 BROADWAY/I-5 SEGMENT

Figure J7-1 House (2118 Jefferson Place) – Alternative BI-2

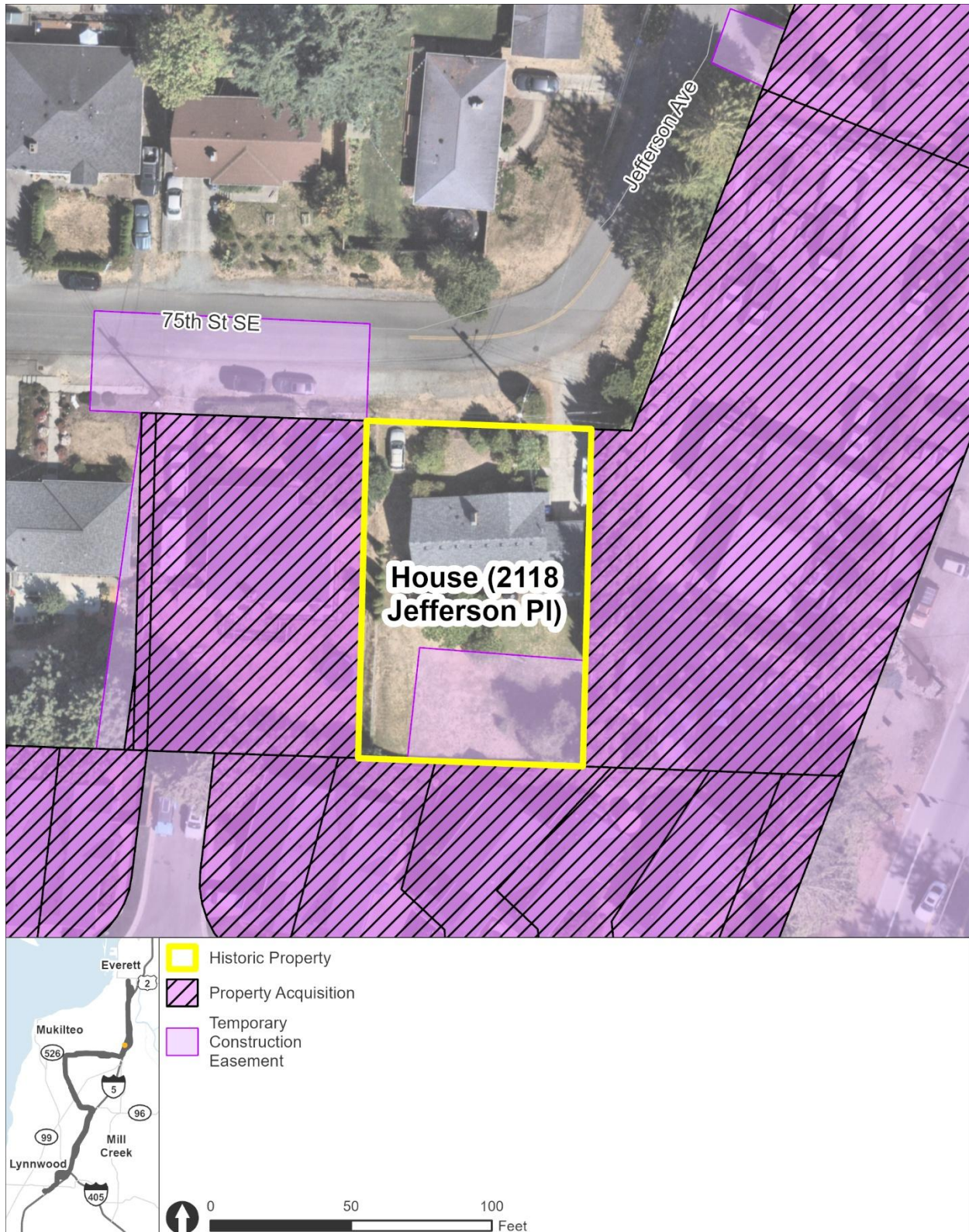


Figure J7-2 Lexington Arms Apartments (2508 Lexington Ave) – Alternative BI-1

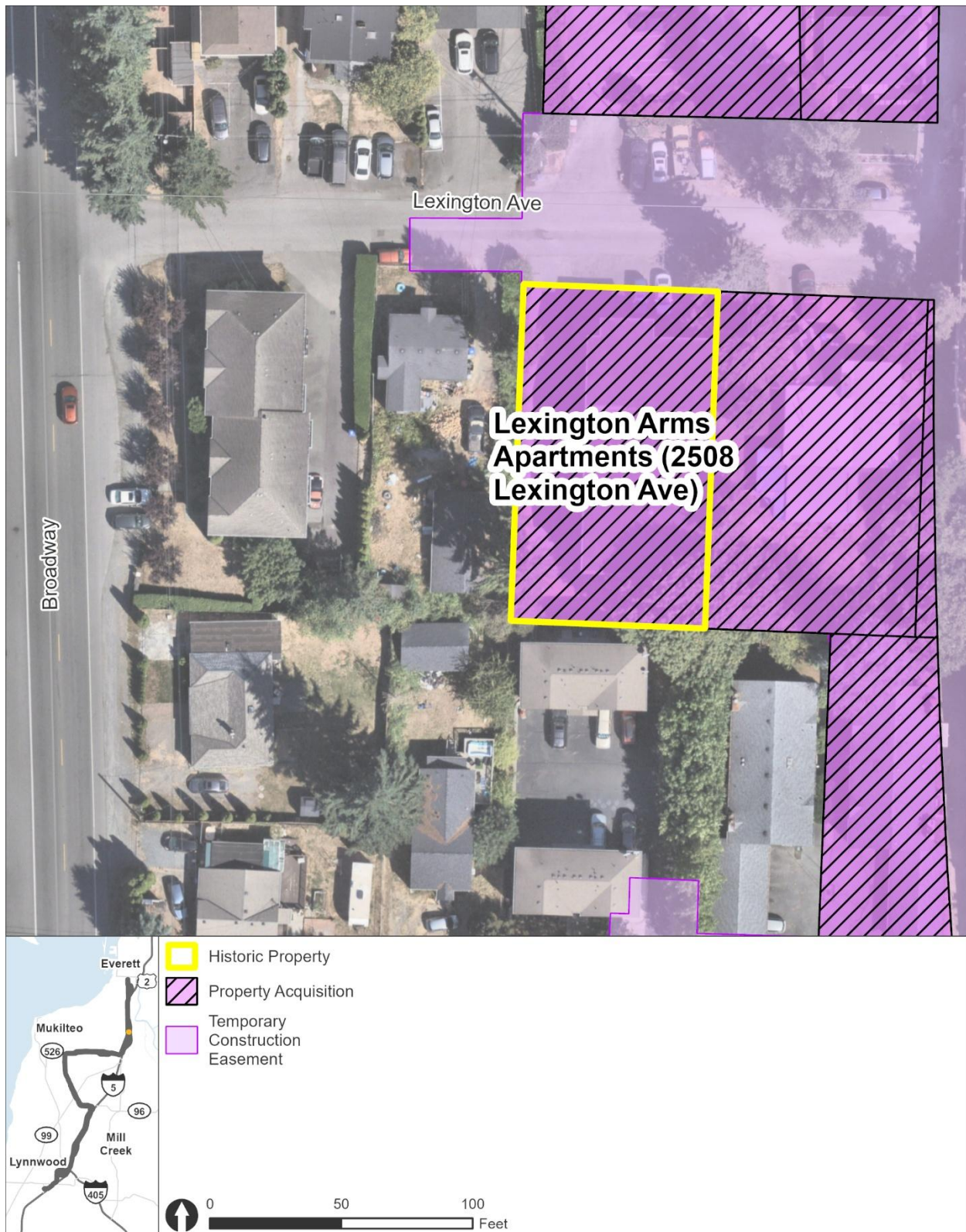
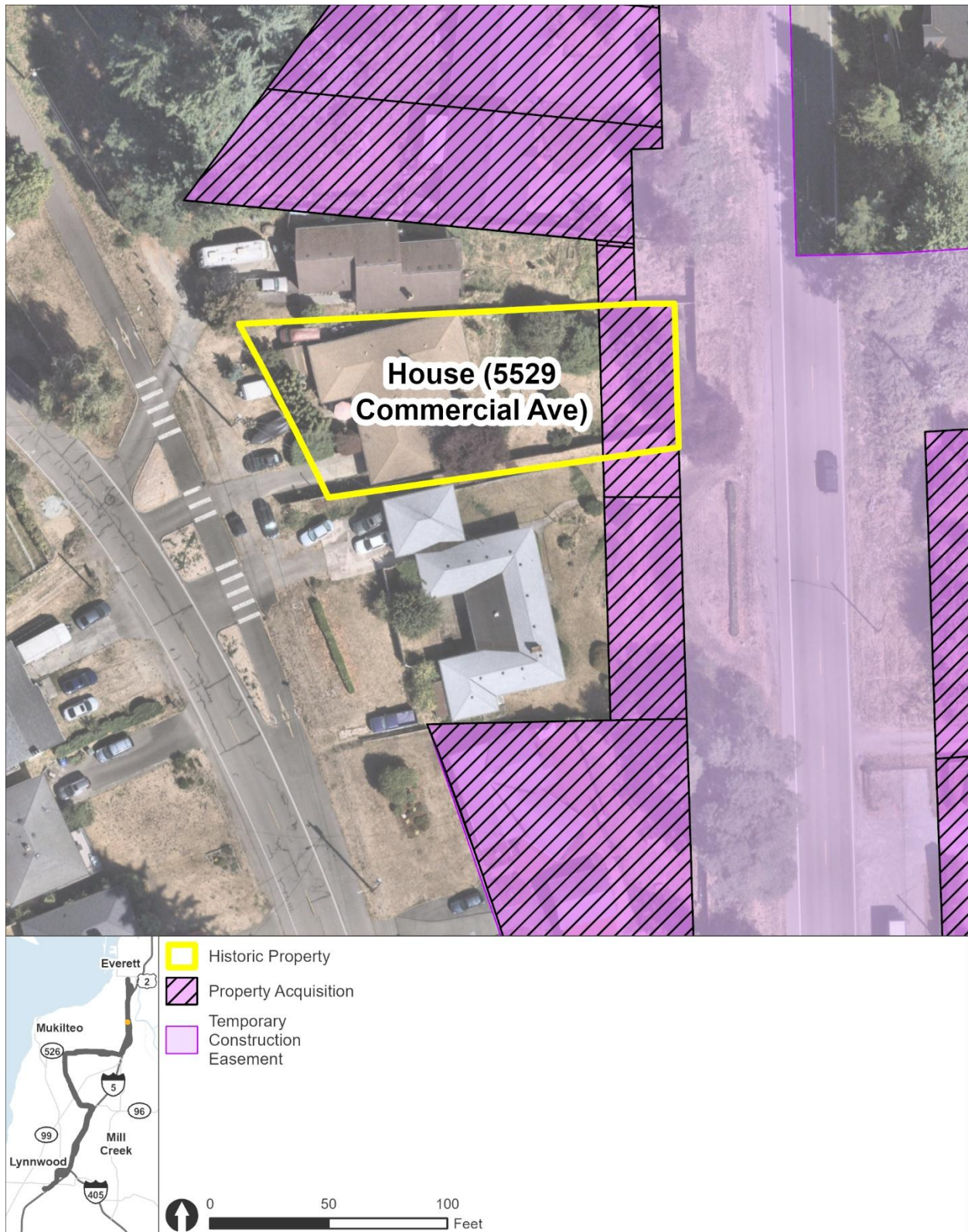


Figure J7-3 House (5529 Commercial Avenue) – Alternative BI-2



8 EVERETT STATION SEGMENT

Figure J8-1 House (2316 47th Street SE) – All Everett Station Segment Alternatives

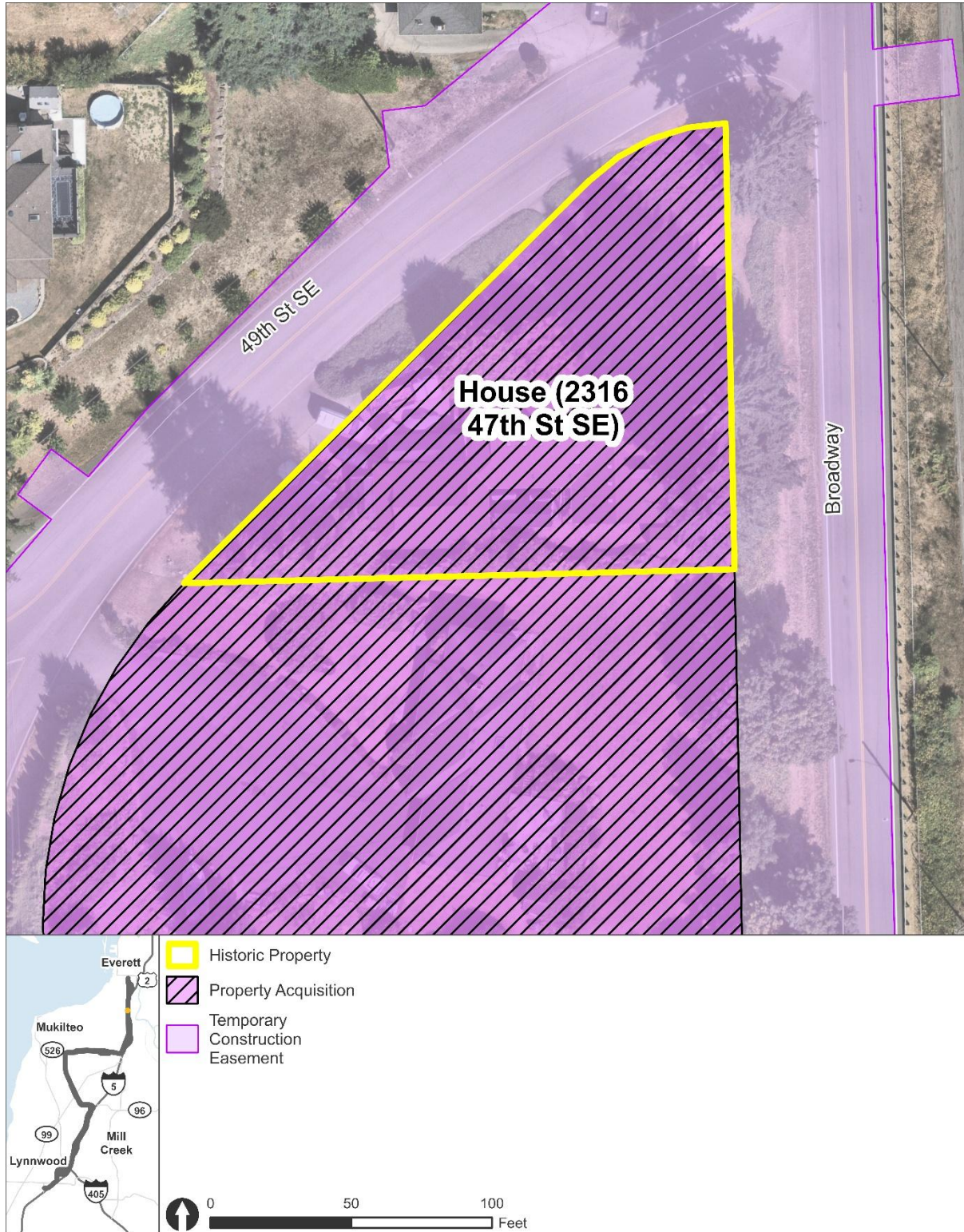


Figure J8-2 Callahan Plumbing and Heating, Building 1 (3221 Broadway) – Alternative EVT-2C

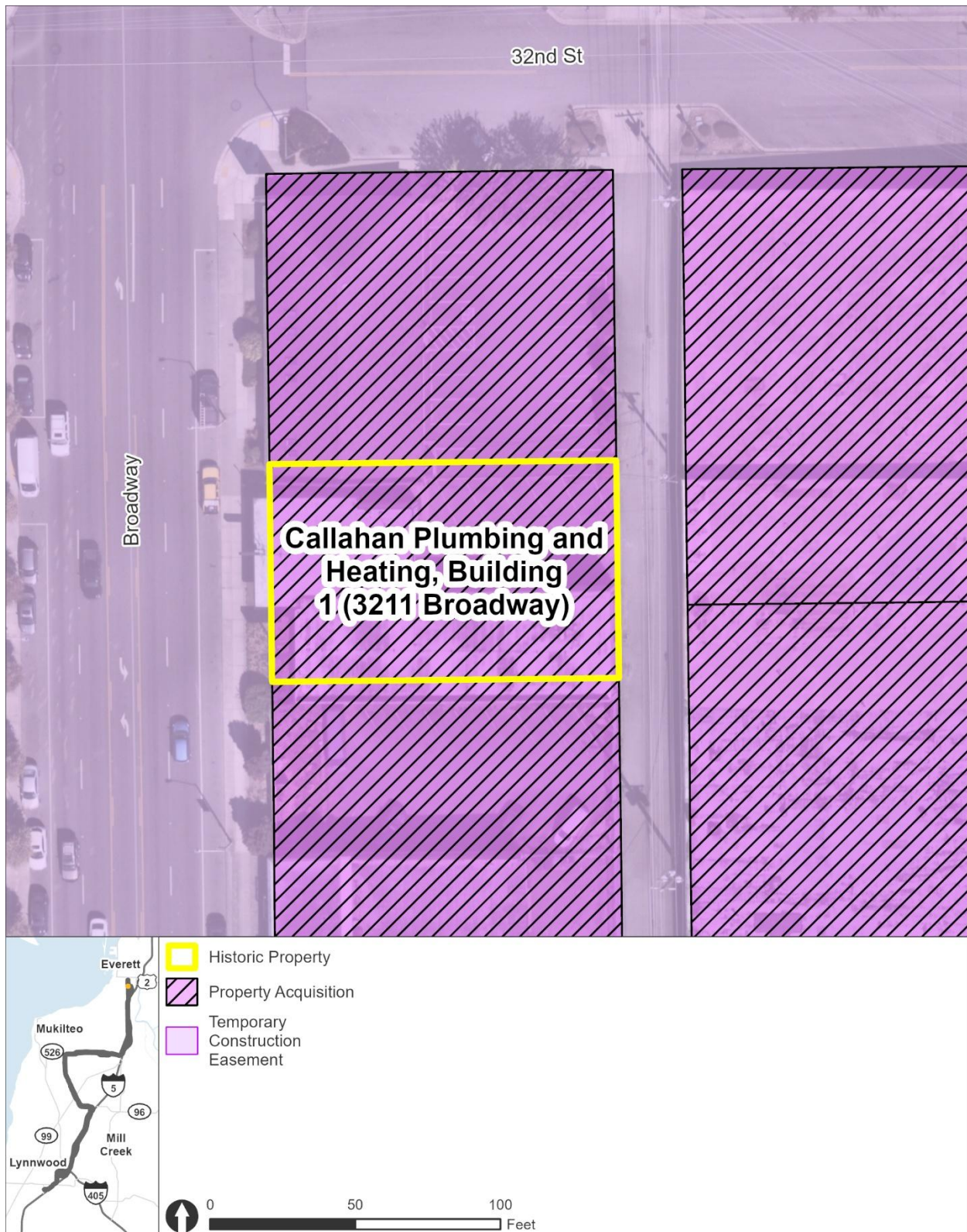


Figure J8-3 Callahan Plumbing and Heating, Building 1 (3221 Broadway) – Alternative EVT-3D



Figure J8-4 Milwaukee Road - Everett Depot (3201 McDougall Avenue) – Alternative EVT-1A

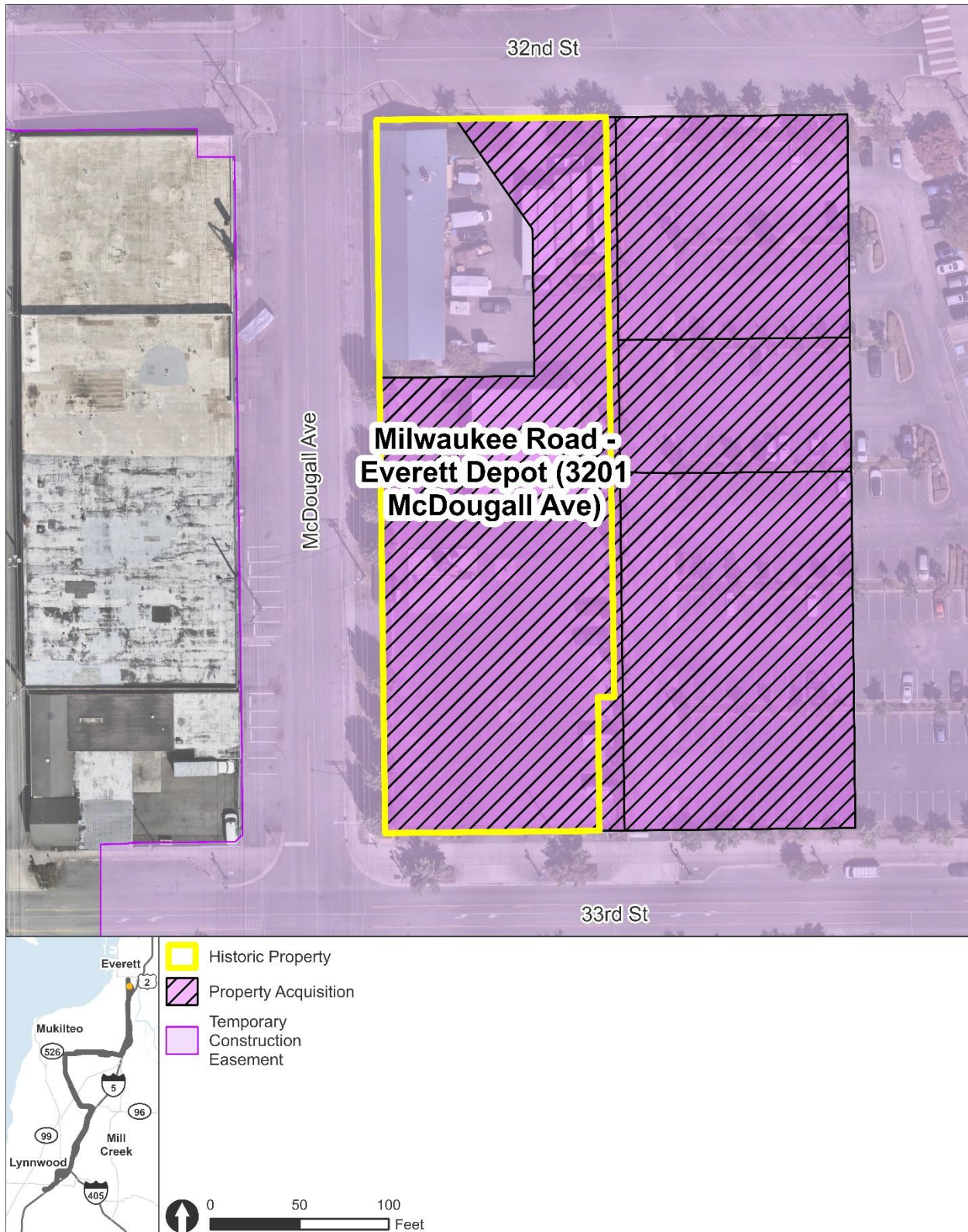


Figure J8-5 Milwaukee Road - Everett Depot (3201 McDougall Avenue) – Alternative EVT-2C

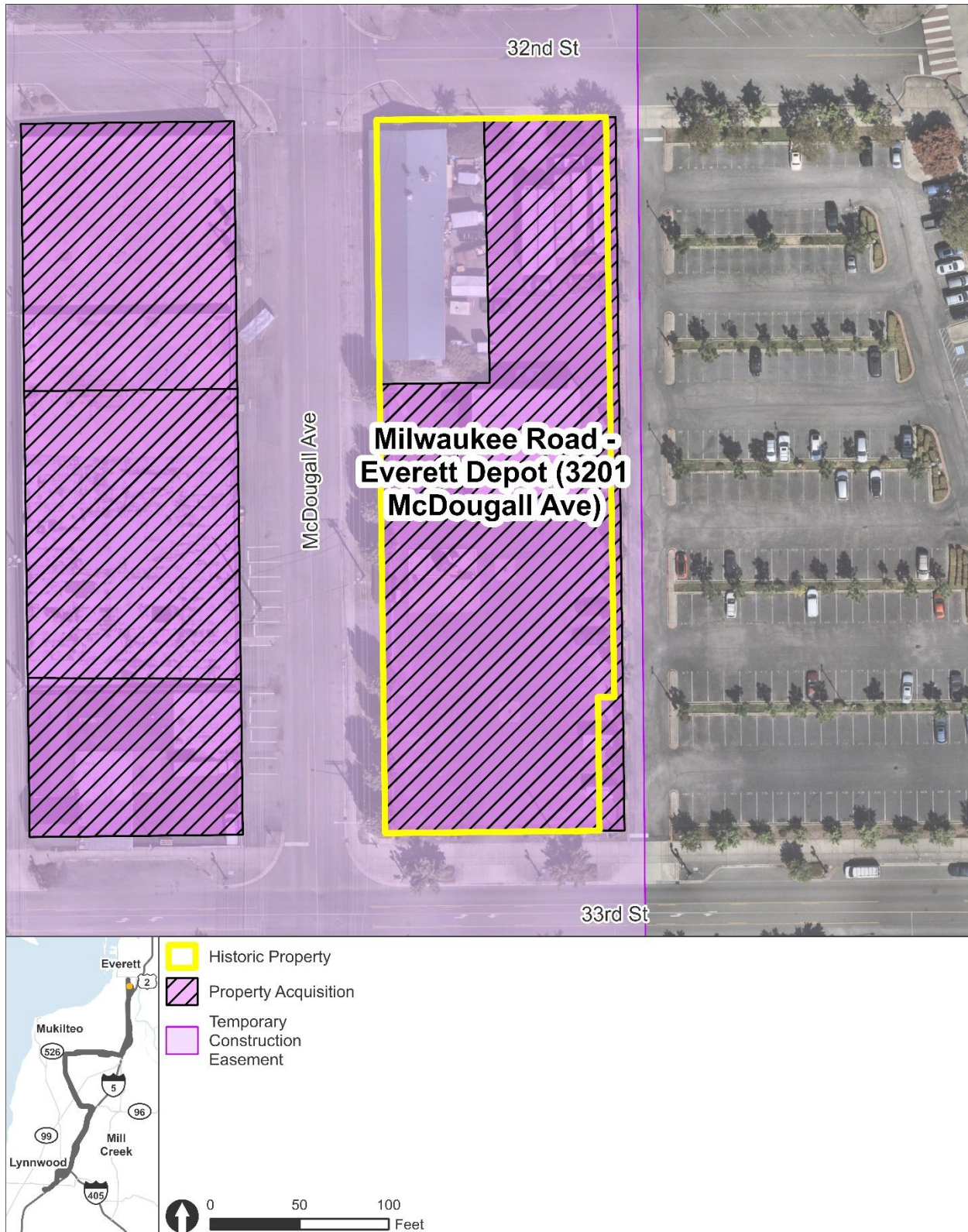


Figure J8-6 Warehouse (3008 McDougall Avenue) – Alternative EVT-3D

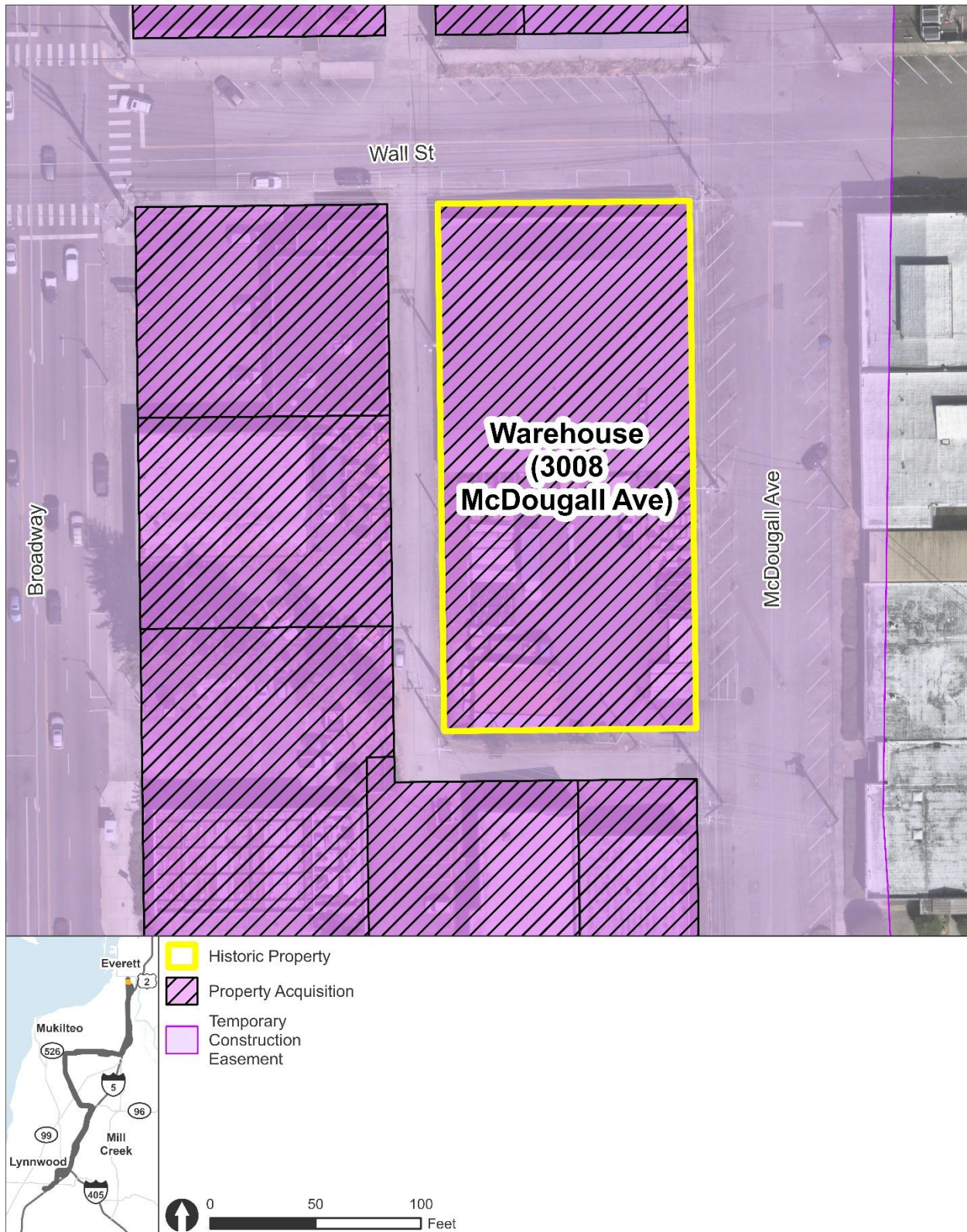


Figure J8-7 Everett Bottling Works (3231 Broadway) – Alternative EVT-2C

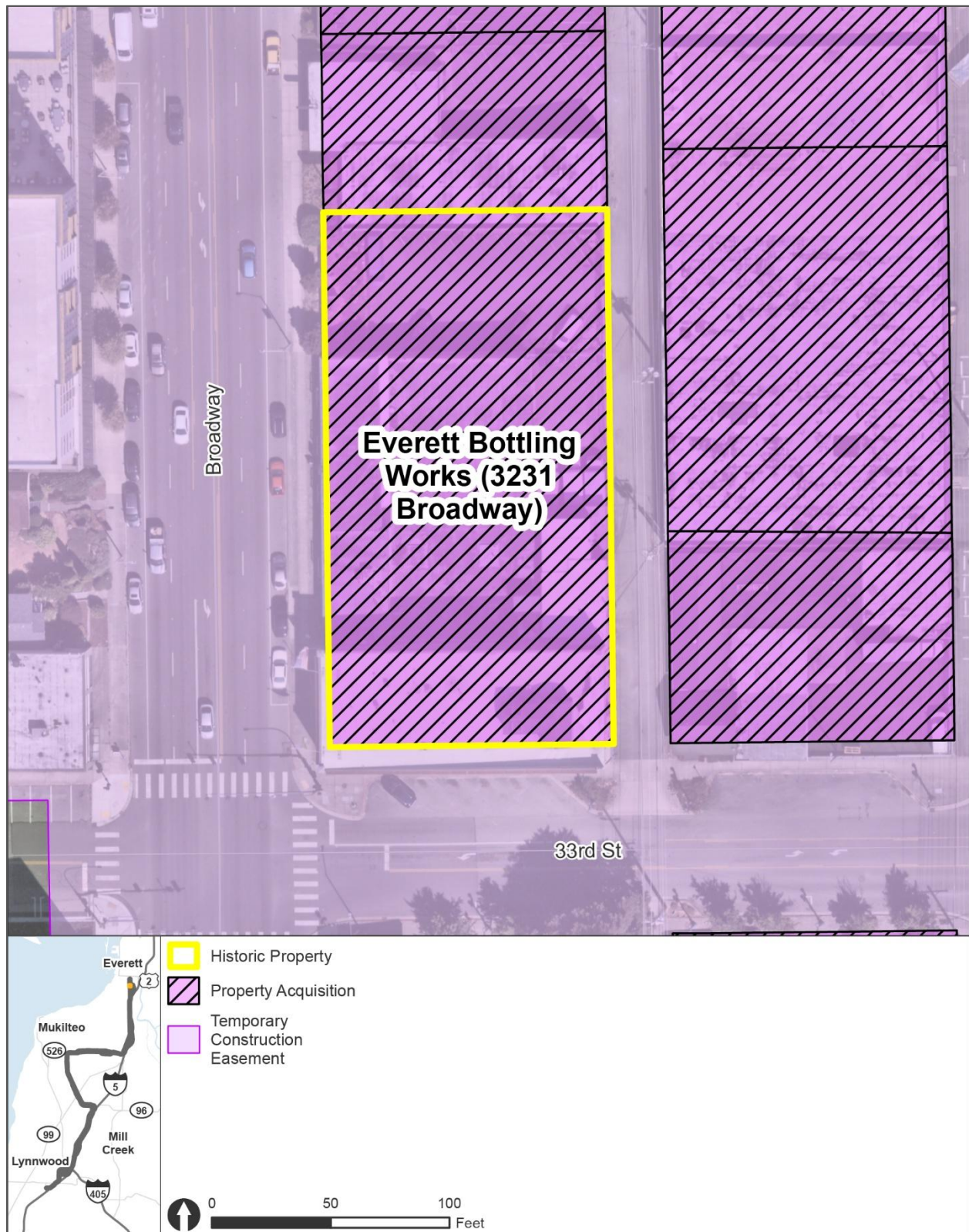
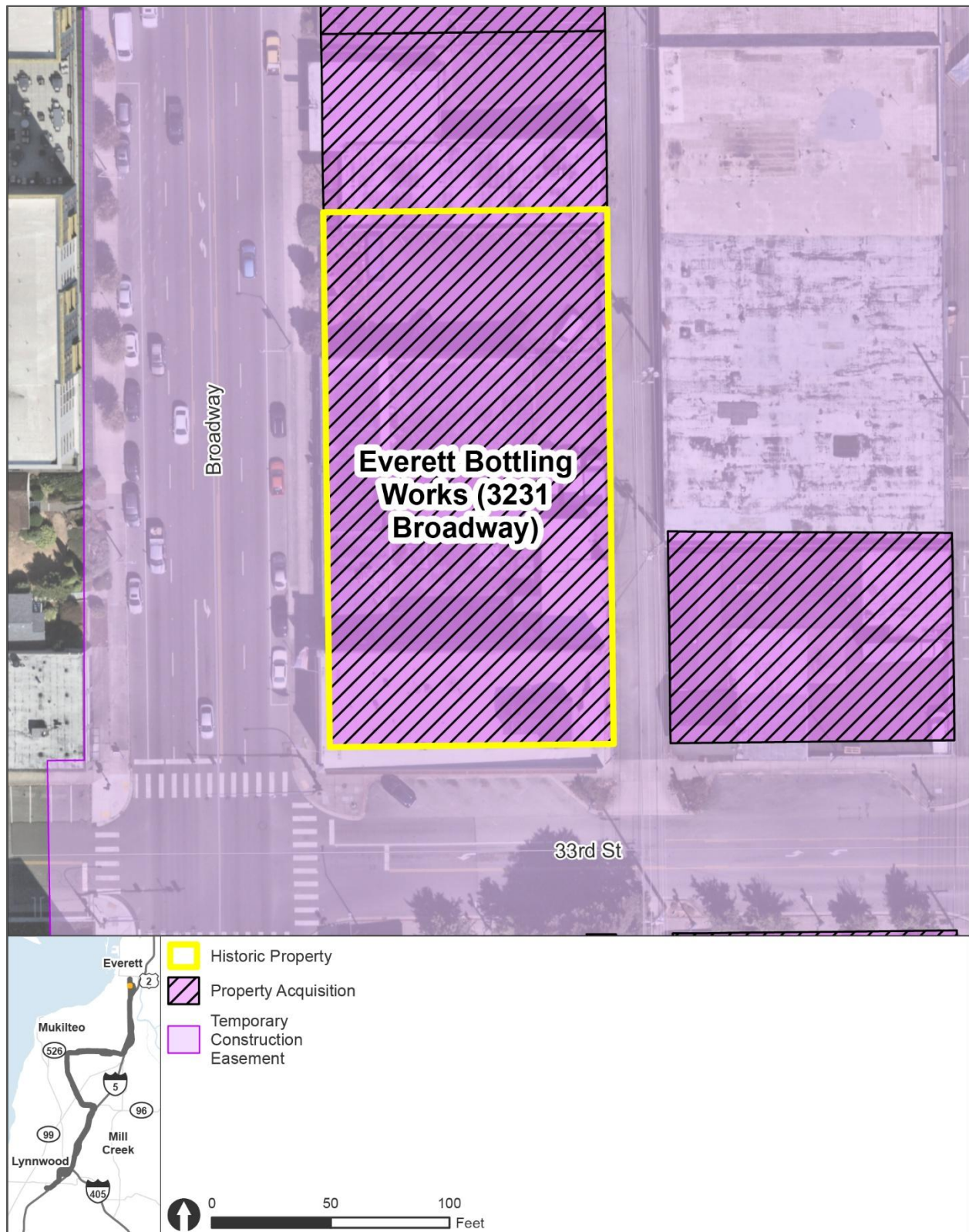
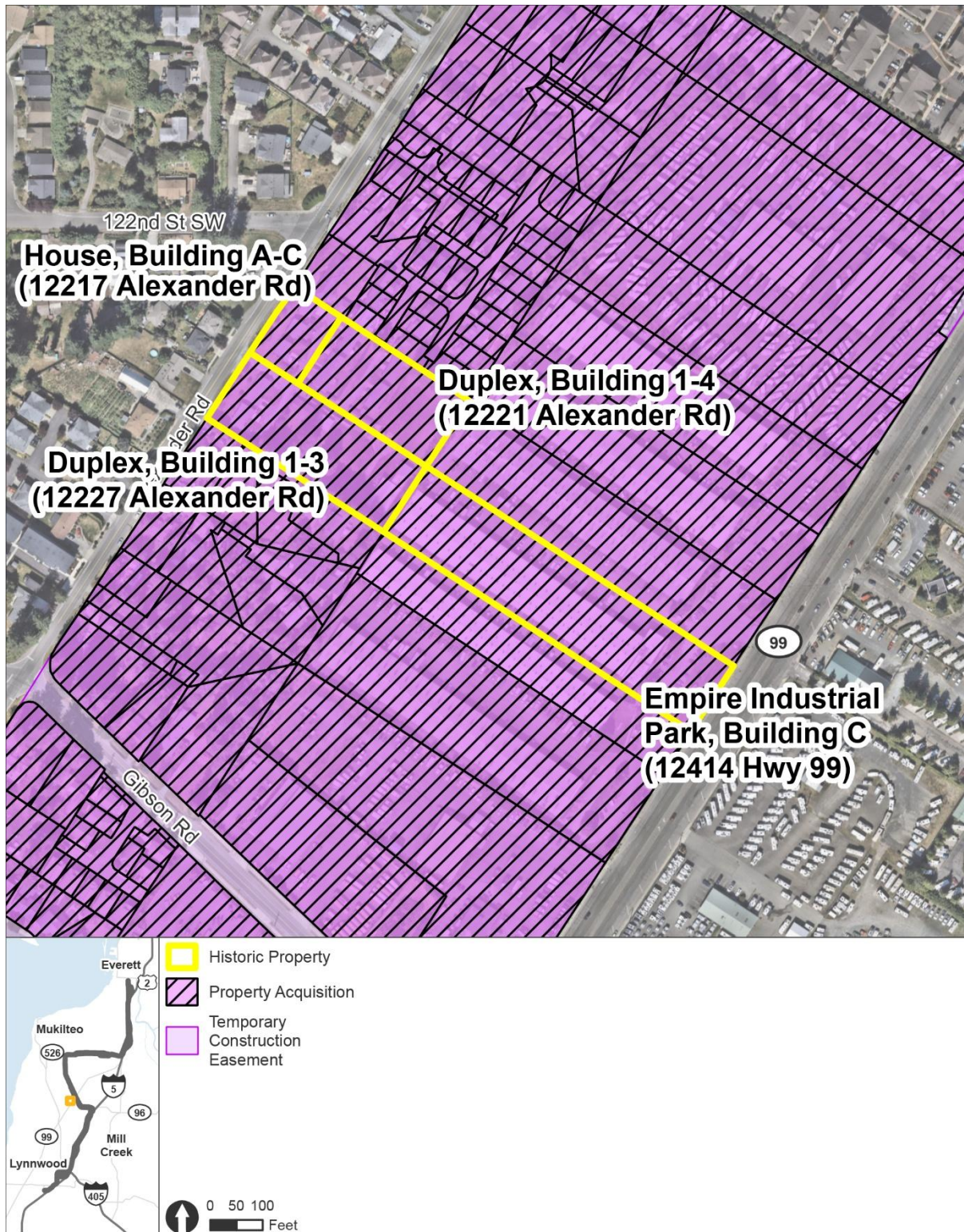


Figure J8-8 Everett Bottling Works (3231 Broadway) – Alternative EVT-3D



9 OMF SITE F

Figure J9-1 OMF Site F and OMF Site F with the Lead Tracks to the West Side of Airport Road Design Option



10 OMF SITE E

OMF Site E contains no built environment historic properties; therefore, no historic properties would be affected by this alternative.

11 OMF SITE B

No OMF Site B alternatives would adversely affect built environment historic properties. Any effects would be associated with proximity to the new facility, but those effects are not anticipated to be adverse.