



Everett Link Extension

Draft Environmental Impact Statement

DRAFT SECTION 4(F) EVALUATION

Appendix H

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Attachments

Attachment A Section 4(f) Coordination

Acronyms

AIR	SR 99/Airport Road
ALD	West Alderwood
APE	Area of Potential Effects
ASH	Ash Way
BI	Broadway/I-5
CFR	Code of Federal Regulations
EGN	SR 526/Evergreen
EIS	Environmental Impact Statement
EVLE	Everett Link Extension
EVT	Everett Station
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
I	Interstate
MAR	Mariner
NEPA	National Environmental Policy Act
NRHP	National Register of Historic Places
OMF	operations and maintenance facility
OWJ	official(s) with jurisdiction
SEPA	State Environmental Policy Act
SOP	Standard Operating Procedure
SHPO	State Historic Preservation Officer
SR	State Route
ST3	Sound Transit 3
SWI	SW Everett Industrial Center
USC	United States Code

1 INTRODUCTION

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to expand Link light rail transit service from the Lynnwood City Center Station to the Everett Station area in Snohomish County, Washington. The Everett Link Extension (EVLE) Project is part of the Sound Transit 3 (ST3) Plan of regional transit investments, and it includes the light rail alignment, six stations (plus one provisional/unfunded station), two parking facilities, and an operations and maintenance facility (OMF).

Section 4(f) of the Department of Transportation Act of 1966 is a federal law that protects significant publicly owned parks, recreation areas, and wildlife and/or waterfowl refuges, and publicly or privately owned significant historic sites. This report identifies Section 4(f) properties that may be used by the EVLE Project and any associated impacts to those properties. Public comment and additional consultation with the officials with jurisdiction (OWJ) over Section 4(f) properties will be incorporated into the Final Section 4(f) Evaluation included as part of the Final Environmental Impact Statement (EIS).

1.1 Laws, Regulations, and Guidelines

This analysis complies with the requirements of 23 Code of Federal Regulations (CFR) Part 774. The purpose of 23 CFR Part 774 is to implement 49 United States Code (USC) 303, which was originally enacted as Section 4(f) of the Department of Transportation Act of 1966 and is still commonly referred to as “Section 4(f).” The regulation states that U.S. Department of Transportation (USDOT) agencies, including the Federal Transit Administration (FTA) and the Federal Highway Administration (FHWA), may not approve the use of:

... a significant publicly-owned park, recreation area or wildlife and waterfowl refuge or any significant historic site, unless there is no feasible and prudent alternative to the use of land from the property and the action includes all possible planning to minimize harm to the property resulting from the use.

This analysis was also conducted in accordance with the following FTA and FHWA guidance on the Section 4(f) process:

- *Standard Operating Procedures (SOP) No. 18: Section 4(f) Evaluations* (FTA 2016).
- *Section 4(f) Policy Paper* (FHWA 2012).

1.2 Section 4(f) Properties

Section 4(f) requires consideration of the following:

- **Parks and recreational areas** of national, state, or local significance that are both publicly owned and open to the public. Per the *Section 4(f) Policy Paper* (FHWA 2012), the term “significant” under Section 4(f) means that in comparing the availability and function of the park, recreation area, or wildlife and waterfowl refuge with the park, recreation, or refuge objectives of the agency, community or authority, the property in question plays an important role in meeting those objectives. Significance determinations of publicly owned land considered to be a park, recreation area, or wildlife and waterfowl refuge are made by the

OWJ over the property. Per 23 CFR 774.11(c), consideration under Section 4(f) is not required when the OWJ over a park, recreation area, or wildlife and waterfowl refuge determine that the property, considered in its entirety, is not significant. Properties are assumed to be significant in the absence of a determination.

- **Wildlife and waterfowl refuges** of national, state, or local significance that are publicly owned and open to the public to the extent that public access does not interfere with the primary purpose of the refuge.
- **Historic sites** of national, state, or local significance in public or private ownership, regardless of whether they are open to the public, that are listed in, or eligible for, the National Register of Historic Places (NRHP). Within a NRHP-listed or -eligible historic district, Section 4(f) applies to those properties that are considered contributing to the eligibility of the historic district, as well as any individually eligible property within the district. Section 4(f) also applies to all archaeological sites on or eligible for inclusion on the NRHP, including those discovered during construction, except when the FTA concludes that the archaeological resource is important chiefly because of what can be learned by data recovery and has minimal value for preservation in place, and the OWJ over the Section 4(f) property have been consulted and have not objected (23 CFR 774.13(b)).

1.3 Definition of Section 4(f) Use

A Section 4(f) use is generally defined as a transportation activity that permanently or temporarily acquires land from a Section 4(f) property or that substantially impairs the important activities, features, or attributes that qualify the property as a Section 4(f) property. There are three types of uses:

- **Direct use:** A direct use occurs when a project acquires or permanently incorporates all or part of a Section 4(f) property as part of the transportation project. This may occur as a result of partial or full acquisition of a fee simple interest, permanent easement, or temporary easement that exceeds regulatory limits.
- **Temporary use:** A temporary use occurs when the project temporarily occupies any portion of the property (typically during construction) and substantially impairs the property. A temporary occupancy is not considered a use under Section 4(f) when all of the following conditions are satisfied:
 - The duration of use would be temporary (i.e., less than the time needed for construction of the project), and there would be no change in ownership of land.
 - The scope of work would be minor (i.e., both the nature and magnitude of the changes to the Section 4(f) property would be minimal).
 - There would be no anticipated permanent adverse physical impacts, nor would there be interference with the protected activities, features or attributes of the property, on either a temporary or permanent basis.
 - The land being used would be fully restored to a condition that is at least as good as that which existed before the project.
 - There is documented agreement of the OWJ over the Section 4(f) property regarding the above conditions.

If the criteria are not met, the temporary use is evaluated in the same manner as a direct use. A temporary occupancy, wherein impacts do not meet the exception criteria and are greater than a *de minimis* impact, is considered a use.

- **Constructive use:** A constructive use occurs when the transportation project does not permanently incorporate land from a Section 4(f) property, but the project's proximity impacts (e.g., noise, vibration, visual, access) are so severe that the protected activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired (23 CFR 774.15[a]). For example, a constructive use could occur if a transportation project would increase noise levels that would substantially interfere with the use of a noise sensitive feature, such as a campground or outdoor amphitheater, or where a transportation project would block the views of a park property that is primarily a scenic viewpoint.

1.4 Approval of Section 4(f) Uses

Before approving the use of a Section 4(f) property, as the federal lead agency, the FTA must either:

- Determine that the project would have a *de minimis* impact on the property (as defined in 23 CFR 774.17), or
- Undertake an individual Section 4(f) evaluation to determine that there is no feasible and prudent avoidance alternative to the use and that all measures to minimize harm to the property have been undertaken.

1.4.1 *De Minimis* Impact Determination

For parks, recreation areas, and wildlife and waterfowl refuges, a *de minimis* impact is one that, after taking into account avoidance, minimization, mitigation, and enhancement measures, would not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f). The OWJ over the property must be informed of the intent to make a *de minimis* impact determination, and public notice and an opportunity for public review and comment must be provided. After considering any comments received from the public, if the OWJ concur in writing that the project would not adversely affect the activities, features, or attributes that make the property eligible for Section 4(f) protection, then the FTA may finalize the *de minimis* impact determination.

For historic sites, a *de minimis* impact means that the FTA has determined, in accordance with Section 106 of the National Historic Preservation Act of 1966 (36 CFR Part 800), that no historic property is affected by the project or the project would have "no adverse effect" on the historic property. Before making a *de minimis* impact finding, FTA must inform the State Historic Preservation Officer (SHPO) of its intent to make a *de minimis* impact determination based on their concurrence. If the SHPO concurs or does not object, FTA may proceed with its finding.

When FTA has made a *de minimis* impact determination, the project is not required to analyze avoidance alternatives for that Section 4(f) property.

1.4.2 Individual Section 4(f) Evaluation

If a project's Section 4(f) use is greater than a *de minimis* impact, FTA is required to consider whether there are feasible and prudent alternatives that would avoid the use. As defined in 23 CFR 774.17, an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. An alternative is not prudent if:

- It would compromise the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;
- It results in unacceptable safety or operational problems;
- After reasonable mitigation, it still causes
 - Severe social, economic, or environmental impacts;
 - Severe disruption to established communities;
 - Severe disproportionate impacts to minority or low-income populations; or
 - Severe impacts to environmental properties protected under other federal statutes;
- It results in additional construction, maintenance, or operational costs of an extraordinary magnitude;
- It causes other unique problems or unusual factors; or
- It involves multiple factors listed above, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.

If the FTA finds that an alternative causes a Section 4(f) use and there is an avoidance alternative that is feasible and prudent, then the alternative that causes a Section 4(f) use must be removed from consideration. If there are no feasible and prudent alternatives that can avoid all Section 4(f) properties, then FTA must choose the alternative that will have the least overall harm in light of the statute's preservation purpose. This is called the Least Overall Harm Analysis.

1.4.3 Section 4(f) Use Exceptions

While Section 4(f) protects parks and recreation areas, there are various exceptions defined in 23 CFR 774.13. For the EVLE Project, Section 4(f) approval would not apply to trails, paths, bikeways, and sidewalks that:

- Occupy a transportation facility right-of-way without limitation to any specific location within that right-of-way, so long as the continuity of the trail, path, bikeway, or sidewalk is maintained; and
- Are part of the local transportation system and which function primarily for transportation.

This exception does not apply to other public entity rights-of-way, such as utility right-of-way.

1.5 Methodology

1.5.1 Identification of Section 4(f) Properties

1.5.1.1 Parks, Recreation Areas, and Wildlife and Waterfowl Refuges

For parks, recreation areas, and wildlife and waterfowl refuges to qualify for protection under Section 4(f), each of the following criteria must be true:

- **The property must be publicly owned:** Public ownership in Section 4(f) refers to ownership by a local, state, or federal government agency.
- **The property must be open to the public:** A property that is open to the public is one where access is permitted to the public during normal hours of operation. Wildlife and waterfowl refuges do not have to provide unrestricted access to the public to be considered a Section 4(f) property.
- **The major purpose of the property must be park, recreation, or refuge activities:** Major purpose is related to the property's primary function and how it is intended to be managed. Parks and recreation areas typically offer a wide range of activities such as walking, hiking, or camping, for example, as well as organized sports like soccer, softball, or tennis. Parks can also be used for passive recreation.
- **The property must be significant in meeting park, recreation, or refuge objectives:** This is determined by the OWJ over the property. The term "significant" means that in comparing the availability and function of the park, recreation area, or refuge, with the park, recreation, or refuge objectives of the agency, community, or authority, the property in question plays an important role in meeting those objectives.

The following plans were reviewed to identify parks, recreation areas, and wildlife and waterfowl refuges within the study area that could be subject to Section 4(f):

- *City of Everett Comprehensive Plan, Parks and Recreation Element* (City of Everett 2021).
- *Everett Parks, Recreation, and Open Space Plan* (City of Everett 2022).
- *City of Lynnwood Comprehensive Plan, Parks, Recreation, and Open Space Element* (City of Lynnwood 2021).
- *City of Lynnwood Parks, Arts, Recreation, and Conservation (PARC) Plan* (City of Lynnwood 2022).
- *Snohomish County Comprehensive Plan, Park and Recreation Element* (Snohomish County 2021).

As noted in Section 1.4.3, there are exceptions to the requirement for Section 4(f) approval for trails, paths, bikeways, and sidewalks that are relevant to the EVLE Project. Transportation facility right-of-way was reviewed for trails identified within the study area. The following local and regional transportation plans were reviewed to evaluate if trails identified within the study area were documented as part of the local transportation system:

- *City of Everett 2044 Comprehensive Plan, Transportation Element* (City of Everett 2025).
- *Connect Lynnwood: Active and Accessible Transportation Plan* (City of Lynnwood 2022).

- *Snohomish County Comprehensive Plan, Transportation Element* (Snohomish County 2024).

1.5.1.2 Historic Properties

For historic properties to qualify for protection under Section 4(f), the property must be listed on or eligible for the NRHP.

To be eligible for listing on the NRHP, a property must be 50 years old, or, if it is less than 50 years old, possess exceptional significance. As noted in the Historic and Archaeological Resources Technical Report in Draft EIS Appendix G.17, the cultural resources team surveyed and inventoried built environment resources for this project that will be 50 years of age or older at the start of project construction (i.e., built in 1980 or earlier). The SHPO concurred with the eligibility determinations for recorded resources in 2025 (see Section 8 for details on consultation with the SHPO).

1.5.2 Study Area

1.5.2.1 Parks, Recreation Areas, and Wildlife and Waterfowl Refuges

The study area for parks, recreation areas, and wildlife and waterfowl refuges includes the area within 250 feet of the project limits (the project footprint and area used for construction).

1.5.2.2 Historic Properties

The study area for historic properties is the Area of Potential Effects (APE) established by the Section 106 process. The APE extends from the project limits to the nearest tax parcel or a maximum of 200 feet where large tax parcels are adjacent to project elements (see the Historic and Archaeological Resources Technical Report in Draft EIS Appendix G.17 for more information). NRHP-listed and eligible properties within the APE are considered in this Section 4(f) analysis.

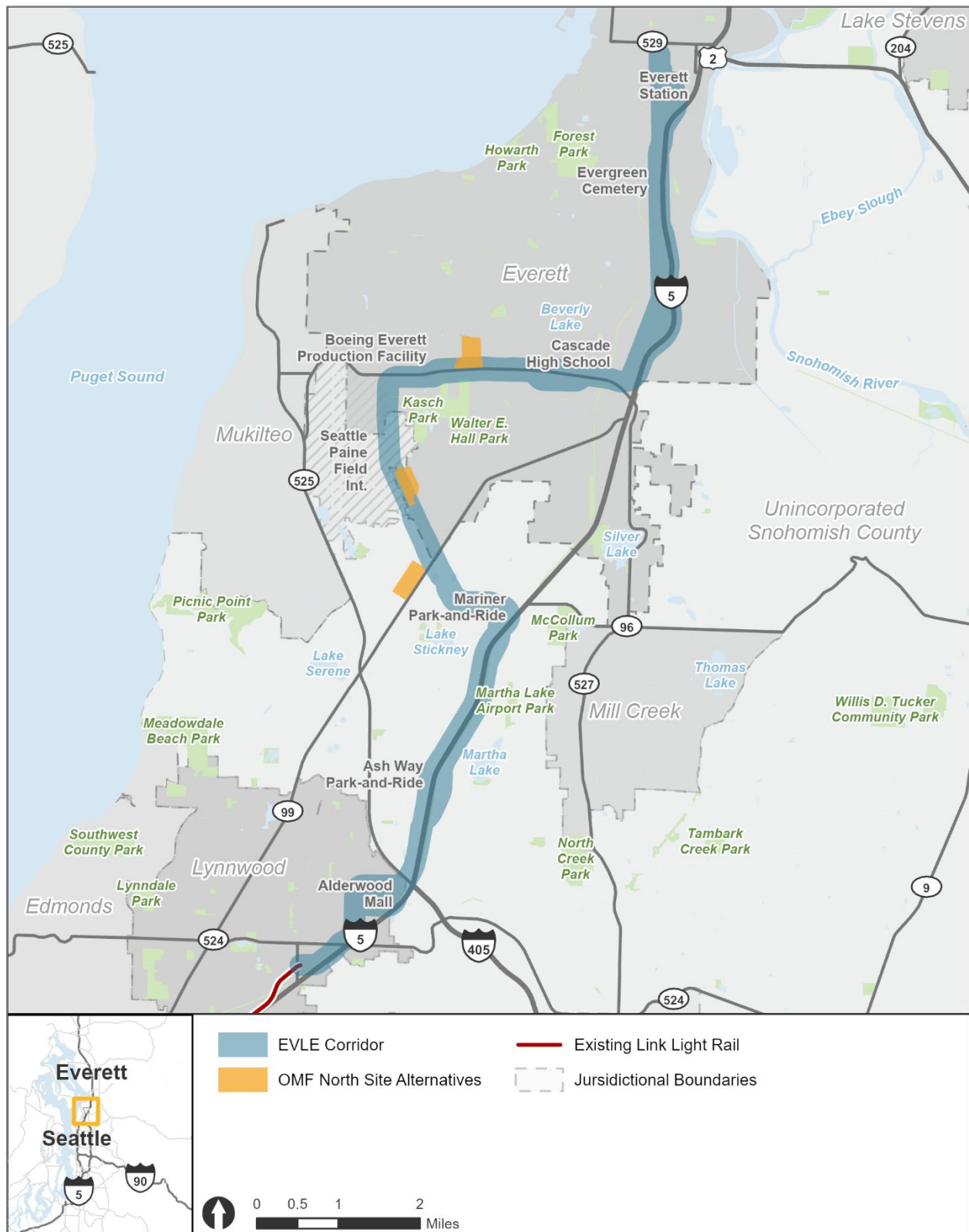
2 DESCRIPTION OF THE PROJECT

Sound Transit is proposing to expand Link light rail transit service northward from the Lynnwood City Center Station to the Everett Station area in Snohomish County, Washington (Figure H2-1). The EVLE Project would provide fast, reliable light rail service to regional residential and job centers in Snohomish County's growing urban areas. The proposed project is part of the ST3 Plan of regional transit system investments, funding for which was approved by voters in the region in 2016.

For this analysis, the EVLE Project consists of approximately 16 miles of light rail guideway, seven light rail stations, two parking facilities, and an operations and maintenance facility (OMF North). Sound Transit proposes to begin construction of the project in 2030. The current schedule for opening light rail service from the Lynnwood City Center Station to Everett Station is 2041, with a shorter route connecting Lynnwood City Center to the SW Everett Industrial Center Station opening first in 2037. OMF North would open by 2034, and parking facilities at the Mariner and Everett Stations would open by 2046.

One station, State Route (SR) 99/Airport Road Station, is currently considered provisional since planning, preliminary engineering, and environmental review are funded, but final design and construction are not. However, for purposes of this evaluation, all seven stations are assumed to be funded and open according to the schedule described above to capture all locations where impacts could occur. The station would be fully constructed and open for service when additional funding is identified.

Figure H2-1 EVLE Project Corridor



2.1 Purpose of the EVLE Project

The purpose of EVLE is to expand Sound Transit's Link light rail transit system from the Lynnwood City Center Station to the Everett Station area, along with an OMF, to:

- Provide high quality, rapid, reliable, accessible, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the ST3 Plan (Sound Transit 2016).
- Improve regional mobility by increasing connectivity and capacity in the EVLE corridor from the Lynnwood Transit Center to the Everett Station area to meet projected transit demand.
- Connect regional centers as described in adopted regional and local land use, transportation, and economic development plans and Sound Transit's *Regional Transit Long-Range Plan* (Sound Transit 2014).
- Implement a system that is technically and financially feasible to build, operate, and maintain.
- Expand mobility for the corridor and the region's residents, including explicit consideration for those who use transit as a primary means of transportation.
- Encourage smart growth in station areas through support of transit oriented development (TOD) and multimodal integration in a manner that is consistent with local land use plans and policies.
- Encourage convenient and safe non-motorized access to transit stations, such as bicycle and pedestrian connections, consistent with Sound Transit's System Access Policy.
- Preserve and promote a healthy environment and economy by minimizing adverse impacts on the natural, built, and socioeconomic environments through smart practices.
- Provide an OMF with the capacity to receive, test, commission, store, maintain, and deploy vehicles to support the intended level of service for system-wide light rail expansion.
- Develop an OMF that supports efficient and reliable light rail service and minimizes system operating costs.

2.2 Need for the EVLE Project

The project is needed because:

- Chronic roadway congestion on Interstate 5 (I-5) and SR 99 – two primary highways connecting communities along the corridor – delays today's travelers, including those using transit, and degrades the reliability of bus service traversing the corridor, particularly during commute periods.
- These chronic, degraded conditions are expected to continue to worsen as the region's population and employment grow.
- Regional and local plans call for high-capacity transit in the corridor consistent with Sound Transit's *Regional Transit Long-Range Plan* (Sound Transit 2014).
- Snohomish County residents and communities, including those who use transit as a primary means of transportation, need long-term regional mobility and multimodal connectivity, as called for in the Washington State Growth Management Act.

- Increased residential and/or employment density at and around high-capacity stations and increased options for multimodal access are called for by regional and local plans.
- Prioritizing transportation investments that decrease vehicle miles traveled (VMT), and their resulting environmental effects, is a goal of the state and region, as established in Washington state law and embodied in Puget Sound Regional Council's (PSRC) *Regional Transportation Plan* (PSRC 2018).
- The current regional system lacks an OMF with sufficient capacity and suitable location to support the efficient and reliable long-term operations for system-wide light rail expansion, including the next phase of light rail expansion in Snohomish and King Counties.
- New light rail maintenance and storage capacity needs to be available with sufficient time to accept delivery of and commission new vehicles to meet fleet expansion needs and to store existing vehicles while the new vehicles are tested and prepared.

2.3 Summary of Alternatives

2.3.1 Alternatives Development

In 2021, Sound Transit initiated agency coordination and robust public engagement to identify potential alternatives for light rail routes and profiles as well as potential station and OMF North locations. Over 50 potential station and alignment alternatives and 18 potential OMF sites were initially identified. All potential alternatives were evaluated. Some were then eliminated from further consideration if they were found to be inconsistent with the project purpose and need, the ST3 Plan, or other local and regional transportation and land use plans; included major technical challenges (such as difficult topography) or much higher potential additional costs; would not meet operational requirements; or were determined to be infeasible based on environmental constraints (such as wetlands).

Sound Transit then refined the set of station and alignment alternatives to study in the Draft EIS through an Alternatives Development process that began November 1, 2021 when Sound Transit published a notice of early scoping in the State Environmental Policy Act (SEPA) Register to initiate early public engagement and feedback. FTA issued its notice of early scoping for the project in the Federal Register on November 5, 2021. Sound Transit and FTA conducted early scoping from November 1 through December 10, 2021.

Potential alternatives were then evaluated in the increasingly detailed Level 1 and Level 2 alternatives evaluation phases, using criteria based on the project purpose and need. During Alternatives Development, 11 station and alignment alternatives and four OMF site alternatives were evaluated but not advanced to the Draft EIS.

Sound Transit initiated scoping under SEPA with a Determination of Significance and Scoping Notice published in the SEPA Register on January 23, 2023. The scoping process was conducted from January 23 through March 10, 2023. Four suggestions for new station and alignment alternatives from SEPA scoping comments were advanced as potential design refinements or design options for consideration in the Draft EIS.

In June 2023, the Sound Transit Board of Directors identified the alternatives for study in the Draft EIS in Motion M2023-47. FTA initiated scoping under NEPA with a Notice of Intent to Prepare an EIS published in the *Federal Register* on July 29, 2025. The NEPA scoping period

extended from July 29 through August 28, 2025. No additional alternatives were identified for further study in the EIS based on comments received during the NEPA scoping period.

2.3.2 Build Alternatives

For planning and engineering purposes, the project is organized into eight geographic segments, discussed in this document from south to north. Within those segments, a total of 17 alignment alternatives and 18 station location alternatives are under consideration. These alignment and station alternatives are combined into Build Alternatives for analysis as shown in Table H2-1 and Figure H2-2.

Table H2-1 describes the alignment and station alternatives as follows:

- **Segments:** The eight alignment segments and corresponding abbreviations are:
 - West Alderwood (ALD).
 - Ash Way (ASH).
 - Mariner (MAR).
 - SR 99/Airport Road (AIR).
 - SW Everett Industrial Center (SWI).
 - SR 526/Evergreen (EGN).
 - Broadway/I-5 (BI).
 - Everett Station (EVT).
- **Alignment alternatives:** Alignment alternatives in each segment are identified with numbers (e.g., ALD-1).
- **Station alternatives:** Station alternatives in each segment are identified with letters (e.g., ALD-B).¹
- **Build Alternatives:** Alignments and stations are combined to create the Build Alternative name (e.g., Station ALD-B is located on Alignment ALD-1, so this pairing is referred to as Alternative ALD-1B). If a preferred Build Alternative has been identified by the Sound Transit Board of Directors, it is indicated with an asterisk.
- **Design options:** A design option is an alternate design for a portion of a Build Alternative. It could be a different route or profile along a portion of an alignment, a different station configuration, or a different parking location. For example, in the West Alderwood Segment the Alderwood Mall Boulevard Design Option is being considered for all three Build Alternatives.

¹ The letters identifying the station alternatives are not sequential because some alternatives previously considered were not advanced to the Draft EIS.

Table H2-1 Alignment and Station Build Alternatives by Segment

Segment	Alignment Alternatives	Station Alternatives	Build Alternatives (Combined Alignment and Station)	Build Alternative Design Options Also Considered
West Alderwood	ALD-1	ALD-B	ALD-1B	Alderwood Mall Boulevard
	ALD 2	ALD-D	ALD-2D*	Alderwood Mall Boulevard
		ALD-F	ALD-2F	Alderwood Mall Boulevard
Ash Way	ASH-1	ASH-A	ASH-1A	None
	ASH-2	ASH-D	ASH-2D	None
Mariner	MAR-1	MAR-B	MAR-1B	Surface Parking
	MAR-2	MAR-D	MAR-2D	Surface Parking
SR 99/ Airport Road	AIR-1	AIR-A	AIR-1A	None
	AIR-2	AIR-B	AIR-2B	None
SW Everett Industrial Center	SWI-1	SWI-A	SWI-1A*	Lower
		SWI-B	SWI-1B	None
		SWI-C	SWI-1C	None
SR 526/ Evergreen	EGN-1	EGN-A	EGN-1A	None
	EGN-2	EGN-B	EGN-2B	North Side of SR 526
	EGN-3	EGN-E	EGN-3E	North Side of SR 526
Broadway/I-5	BI-1	None	BI-1*	None
	BI-2	None	BI-2	None
Everett Station	EVT-1	EVT-A	EVT-1A	None
	EVT-2	EVT-C	EVT-2C*	None
	EVT-3	EVT-D	EVT-3D*	None

* Denotes preferred alternative

There are also three OMF North site alternatives under consideration as shown in Table H2-2 and Figure H2-2.

Table H2-2 OMF North Site Alternatives

Build Alternative	Build Alternative Design Options Also Considered
OMF Site F	Lead Tracks to West Side of Airport Road
OMF Site E	None
OMF Site B	Lead Tracks to South Side of SR 526

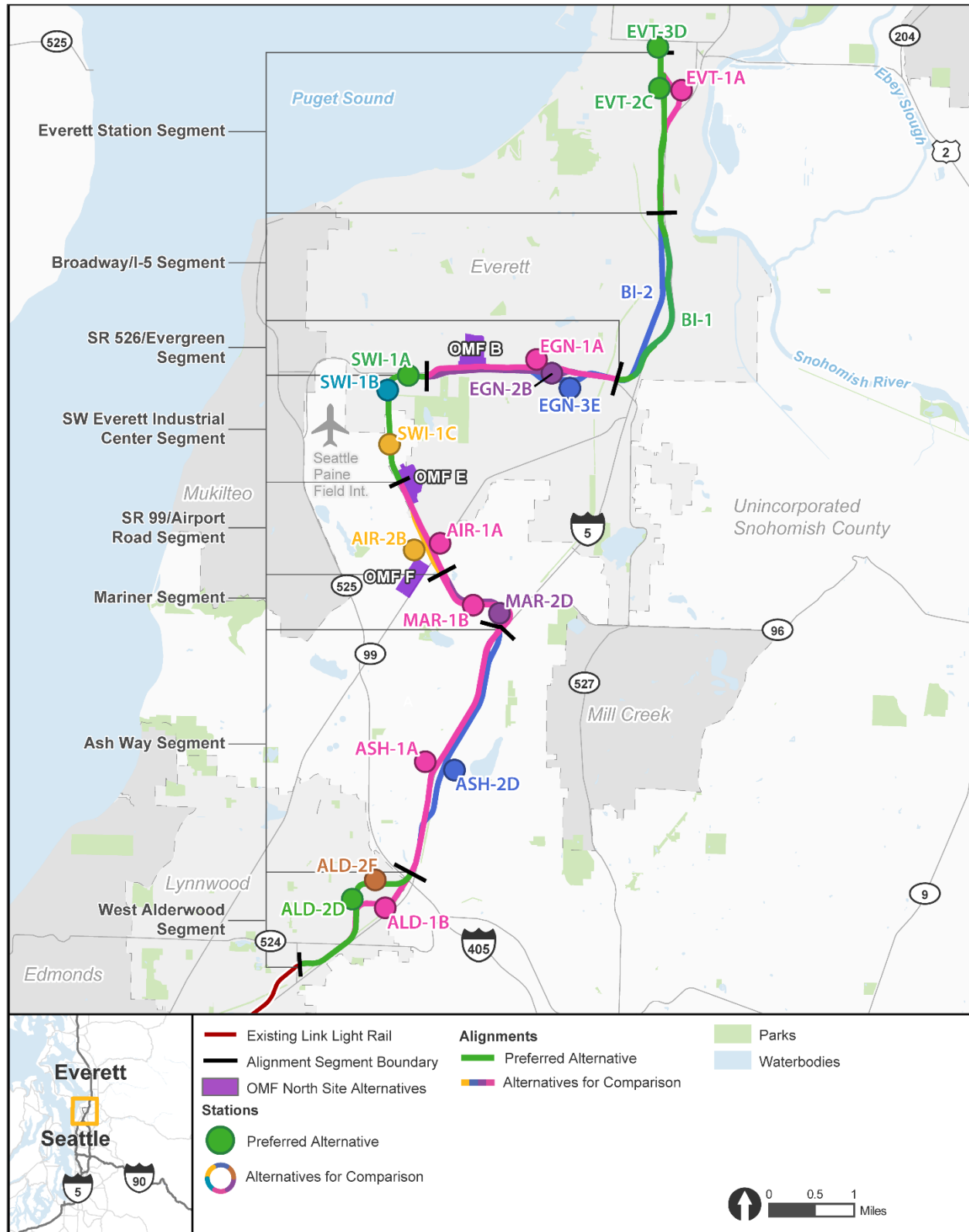
Analysis of the Build Alternatives is based on the conceptual design drawings included in Draft EIS Appendix F.

The No Build Alternative describes the environment, including the transportation system, as it would exist in 2046 without the proposed project.

2.3.3 Potential Design Refinements

In addition to the alternatives described above, the Draft EIS provides a qualitative evaluation of potential design refinements that could reduce overall project cost if applied to the alignment and station alternatives (for more information, see Draft EIS Chapter 2). The potential design refinements identified to date that could be considered in each segment, along with potential changes in impacts, are described in Draft EIS Chapter 4. If Sound Transit decides to include these refinements as part of the project prior to the Final EIS, they would be reflected in the conceptual design plans and evaluated in the Final EIS.

Figure H2-2 EVLE Project Alternatives



3 DESCRIPTION OF SECTION 4(F) PROPERTIES IN THE STUDY AREA

The following sections summarize, by segment, Section 4(f) properties located within the study area. These properties are shown on Figure H3-1 through Figure H3-11. No wildlife or waterfowl refuges were identified within the study area.

The OWJ for each Section 4(f) park and recreational areas is identified in the tables in this section. SHPO is the OWJ for all Section 4(f) historic properties.

3.1 West Alderwood Segment

3.1.1 Parks and Recreational Areas

The one Section 4(f) recreational area within the study area in the West Alderwood Segment is described in Table H3-1.

Within the West Alderwood Segment, the Interurban Trail includes sections that are on-street bicycle lanes, sections located within a transportation facility right-of-way, and sections located within the Snohomish County Public Utility District (SnoPUD) right-of-way. The Interurban Trail is identified in the *City of Lynnwood Active and Accessible Transportation Plan* (City of Lynnwood 2022), which indicates the trail is part of the local transportation system. However, the trail is also identified in the *City of Lynnwood Comprehensive Plan, Parks, Recreation, and Open Space Element* (City of Lynnwood 2021) that indicates the trail is part of the local recreational network; therefore, the trail does not function primarily for transportation and the exception criteria in 23 CFR 774.13(f)(4) does not apply.

Portions of the Interurban Trail in the West Alderwood Segment that are on-street bicycle lanes and portions located within the transportation right-of-way (0.5 miles) would not be subject to the requirement for Section 4(f) approval because they meet the exception criteria in 23 CFR 774.13(f)(3) (see Section 1.4.3). Only portions of trail facilities that occupy existing transportation rights-of-way (i.e., streets or highways) qualify for the exception under 23 CFR 774.13(f)(3). Segments of the trail located within utility or other non-transportation corridors remain subject to Section 4(f) because they do not occupy a transportation facility right-of-way. As such, portions of the trail located within SnoPUD right-of-way (1 mile) would be subject to the requirements for Section 4(f) approval (see Figure H4-1).

Table H3-1 Section 4(f) Park and Recreational Areas – West Alderwood Segment

Park and Recreational Area	OWJ	Location	Activities, Features, and Attributes
Interurban Trail	City of Everett, City of Lynnwood, Snohomish County	Generally parallel to I-5 between north Seattle and Everett	An 11.8-mile paved multi-use trail, 1.5 miles of which are located in the West Alderwood Segment, primarily separated from motorized traffic but with portions of on-street bicycle lanes. The Interurban Trail was established in the mid-1990s and follows the former Interurban Trolley route, which ran from Seattle to Everett from 1910 through 1939. Within the West Alderwood Segment, 1 mile of the Interurban Trail is subject to the requirements for Section 4(f) approval.

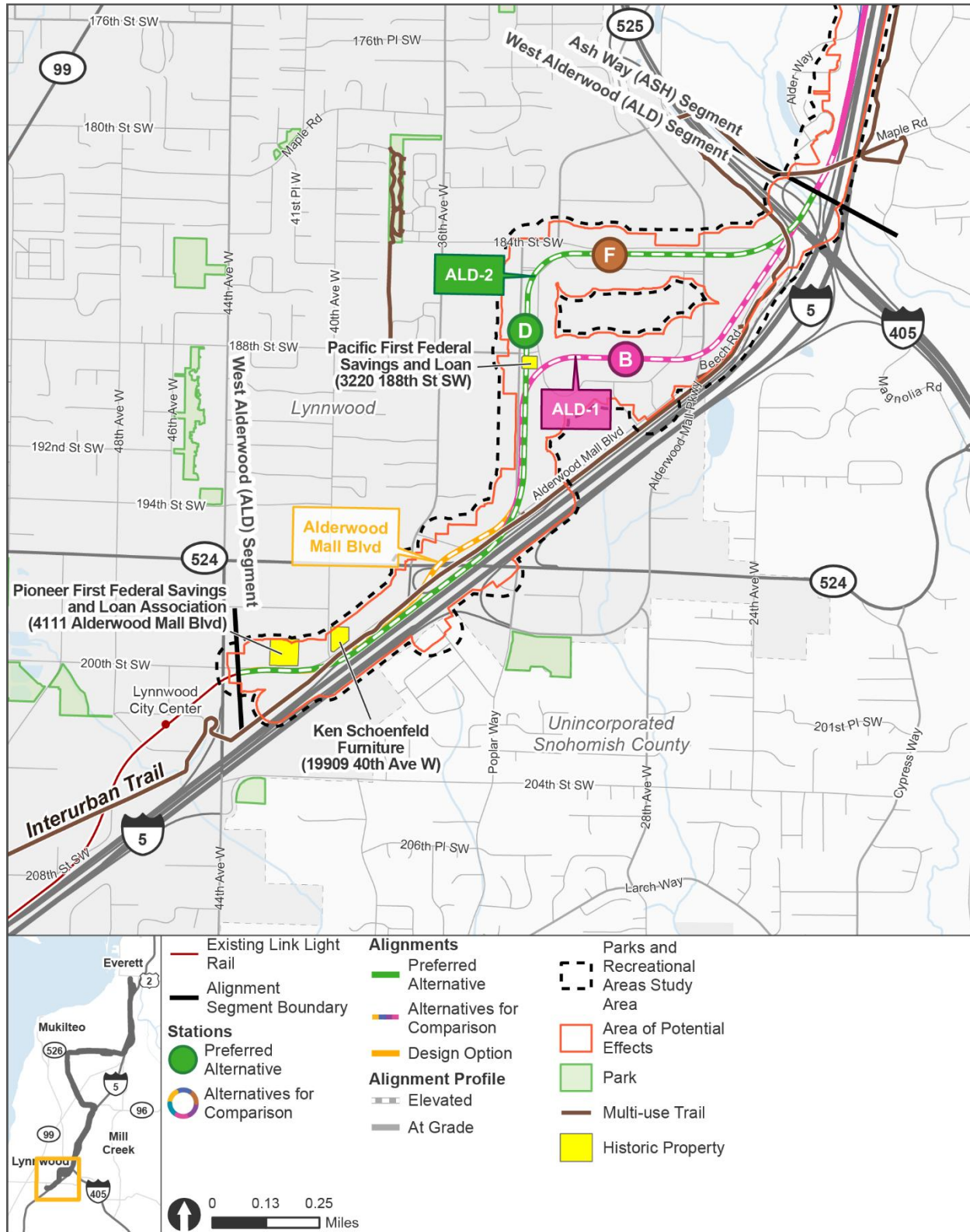
3.1.2 Historic Properties

The three historic properties within the study area in the West Alderwood Segment are described in Table H3-2.

Table H3-2 Section 4(f) Historic Properties – West Alderwood Segment

Historic Name	Address	Year Built	NRHP Eligibility Status
Ken Schoenfeld Furniture	19909 40th Avenue W Lynnwood, WA 98036	1974	Eligible
Pacific First Federal Savings and Loan	3220 188th Street SW Lynnwood, WA 98036	1980	Eligible
Pioneer First Federal Savings and Loan Association	4111 Alderwood Mall Blvd Lynnwood, WA 98036	1979	Eligible

Figure H3-1 Section 4(f) Properties – West Alderwood Segment



SOURCE: City of Lynnwood (2023); Snohomish County (2023).

3.2 Ash Way Segment

3.2.1 Parks and Recreational Areas

The one Section 4(f) recreational area within the study area in the Ash Way Segment is described in Table H3-3.

As with the Alderwood Segment, the Interurban Trail within this segment includes sections that are on-street bicycle lanes, sections located within a transportation facility right-of-way, and sections located within the SnoPUD right-of-way. The Interurban Trail is identified in the *Snohomish County Comprehensive Plan, Transportation Element* (Snohomish County 2024), which indicates the trail is part of the local transportation system in this segment. However, the trail is also identified in the *Park and Recreation Element* that indicates the trail is part of the local recreational network; therefore, the trail does not function primarily for transportation and the exception criteria in 23 CFR 774.13(f)(4) does not apply.

Portions of the Interurban Trail in the Ash Way Segment that are on-street bicycle lanes and portions located within the transportation right-of-way (0.6 miles) would not be subject to the requirement for Section 4(f) approval because they meet the exception criteria in 23 CFR 774.13(f)(3) (see Section 1.4.3). Only portions of trail facilities that occupy existing transportation rights-of-way (i.e., streets or highways) qualify for the exception under 23 CFR 774.13(f)(3). Segments of the trail located within utility or other non-transportation corridors remain subject to Section 4(f) because they do not occupy a transportation facility right-of-way. As such, portions of the trail located within SnoPUD right-of-way (1.9 miles) would be subject to the requirements for Section 4(f) approval (see Figure H4-2 and Figure H4-3).

Table H3-3 Section 4(f) Park and Recreational Areas – Ash Way Segment

Park and Recreational Area	OWJ	Location	Activities, Features, and Attributes
Interurban Trail	City of Everett, City of Lynnwood, Snohomish County	Generally parallel to I-5 between north Seattle and Everett	An 11.8-mile paved multi-use trail, 2.5 miles of which are located in the Ash Way Segment, primarily separated from motorized traffic but with portions of on-street bicycle lanes. The Interurban Trail was established in the mid-1990s and follows the former Interurban Trolley route, which ran from Seattle to Everett from 1910 through 1939. Within the Ash Way Segment, 1.9 miles of the Interurban Trail are subject to the requirements for Section 4(f) approval.

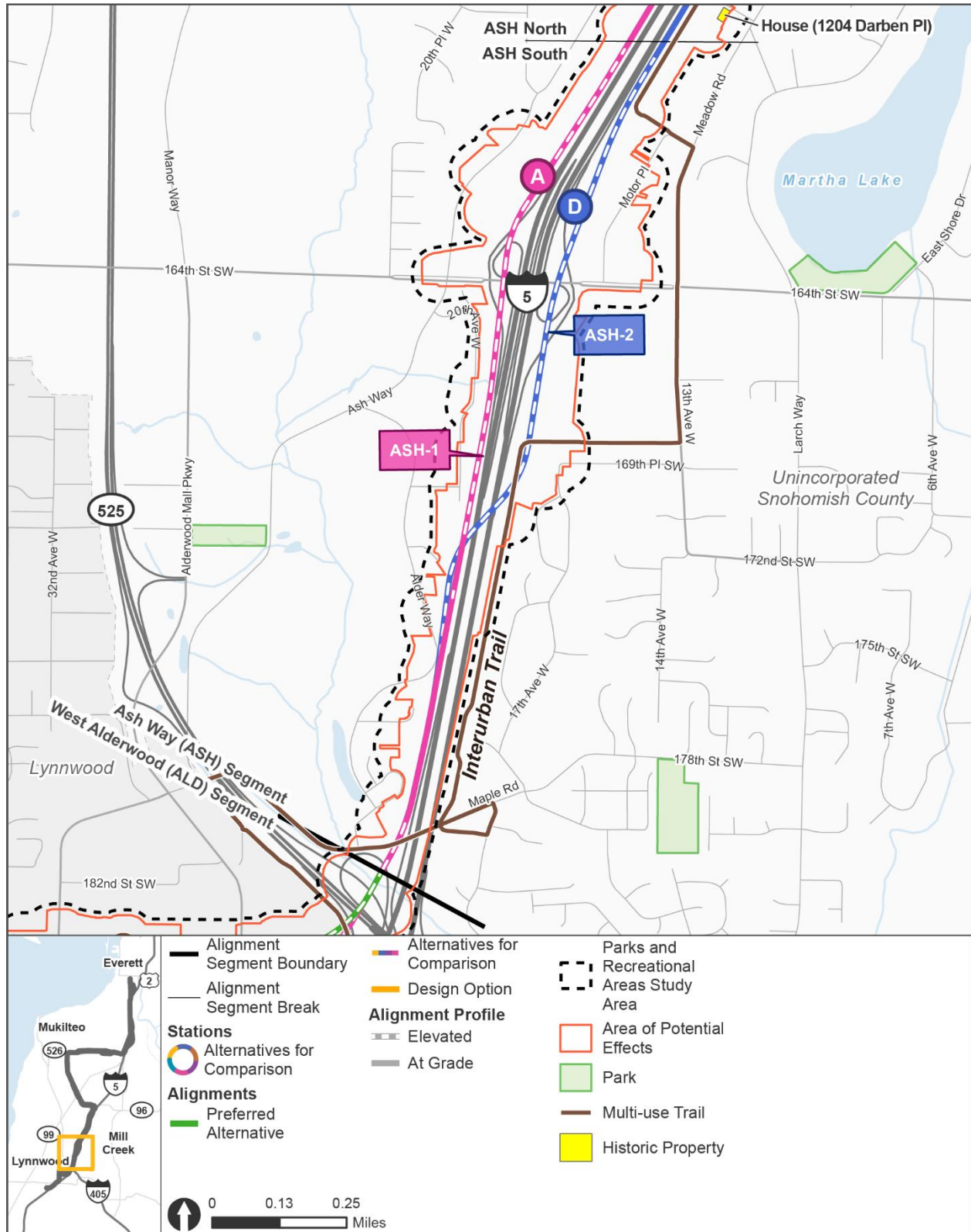
3.2.2 Historic Properties

The one historic property within the study area in the Ash Way Segment is described in Table H3-4.

Table H3-4 Section 4(f) Historic Properties – Ash Way Segment

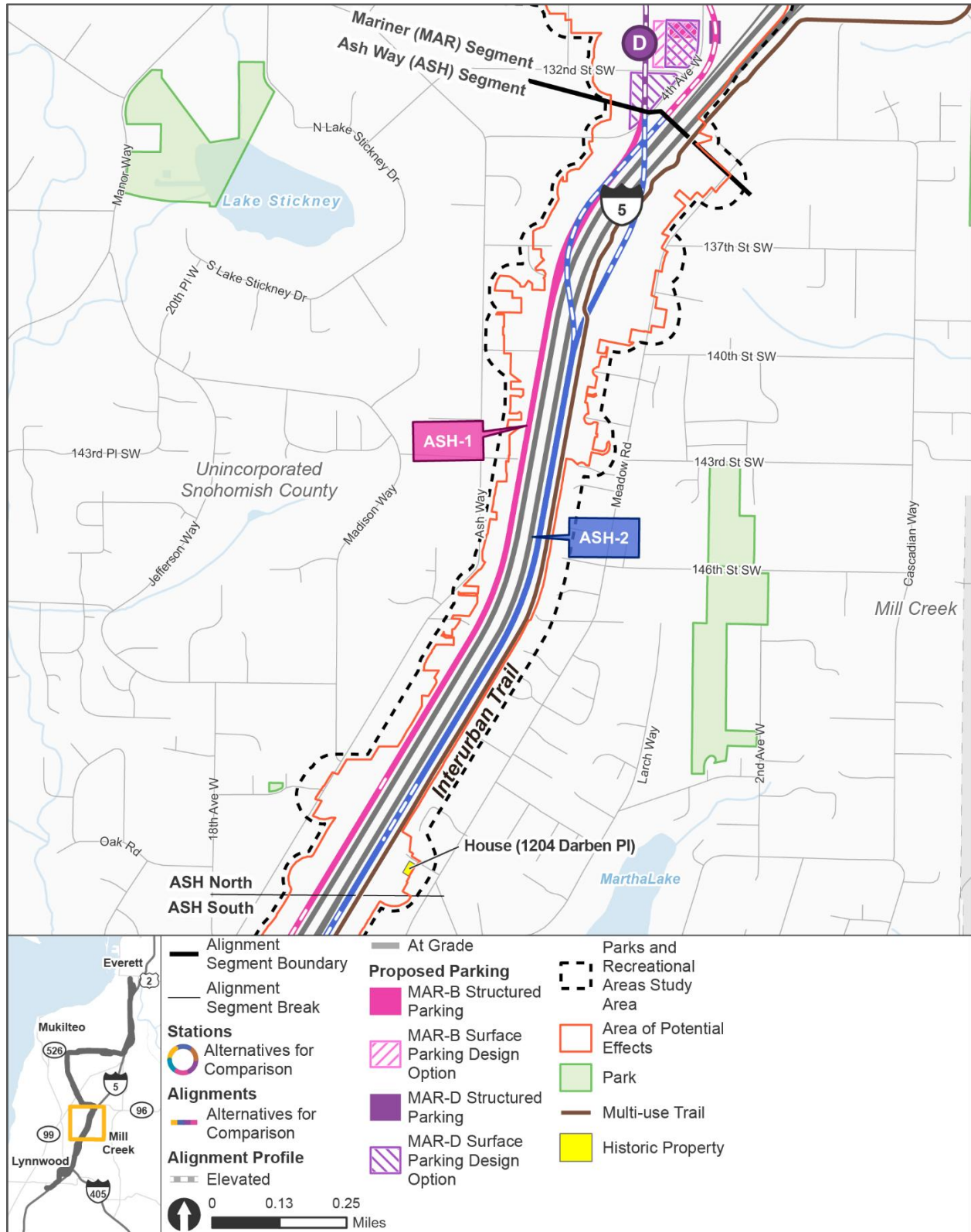
Historic Name	Address	Year Built	NRHP Eligibility Status
House	1204 Darben Place Lynnwood, WA 98087	1967	Eligible

Figure H3-2 Section 4(f) Properties – Ash Way Segment (South)



SOURCE: City of Lynnwood (2023); Snohomish County (2023).

Figure H3-3 Section 4(f) Properties – Ash Way Segment (North)



SOURCE: Snohomish County (2023).

3.3 Mariner Segment

3.3.1 Parks and Recreational Areas

The Interurban Trail continues into the Mariner Segment (0.1 miles) and is located within a transportation facility right-of-way throughout the segment. The Interurban Trail is identified in the *Snohomish County Comprehensive Plan, Transportation Element* (Snohomish County 2024), which indicates the trail is part of the local transportation system in this segment. However, the trail is also identified in the *Park and Recreation Element* that indicates the trail is part of the local recreational network; therefore, the trail does not function primarily for transportation and the exception criteria in 23 CFR 774.13(f)(4) does not apply. Portions of trail facilities that occupy existing transportation rights-of-way (i.e., streets or highways) qualify for the exception under 23 CFR 774.13(f)(3). Therefore, within the Mariner Segment, the Interurban Trail is not subject to the requirements for Section 4(f) approval.

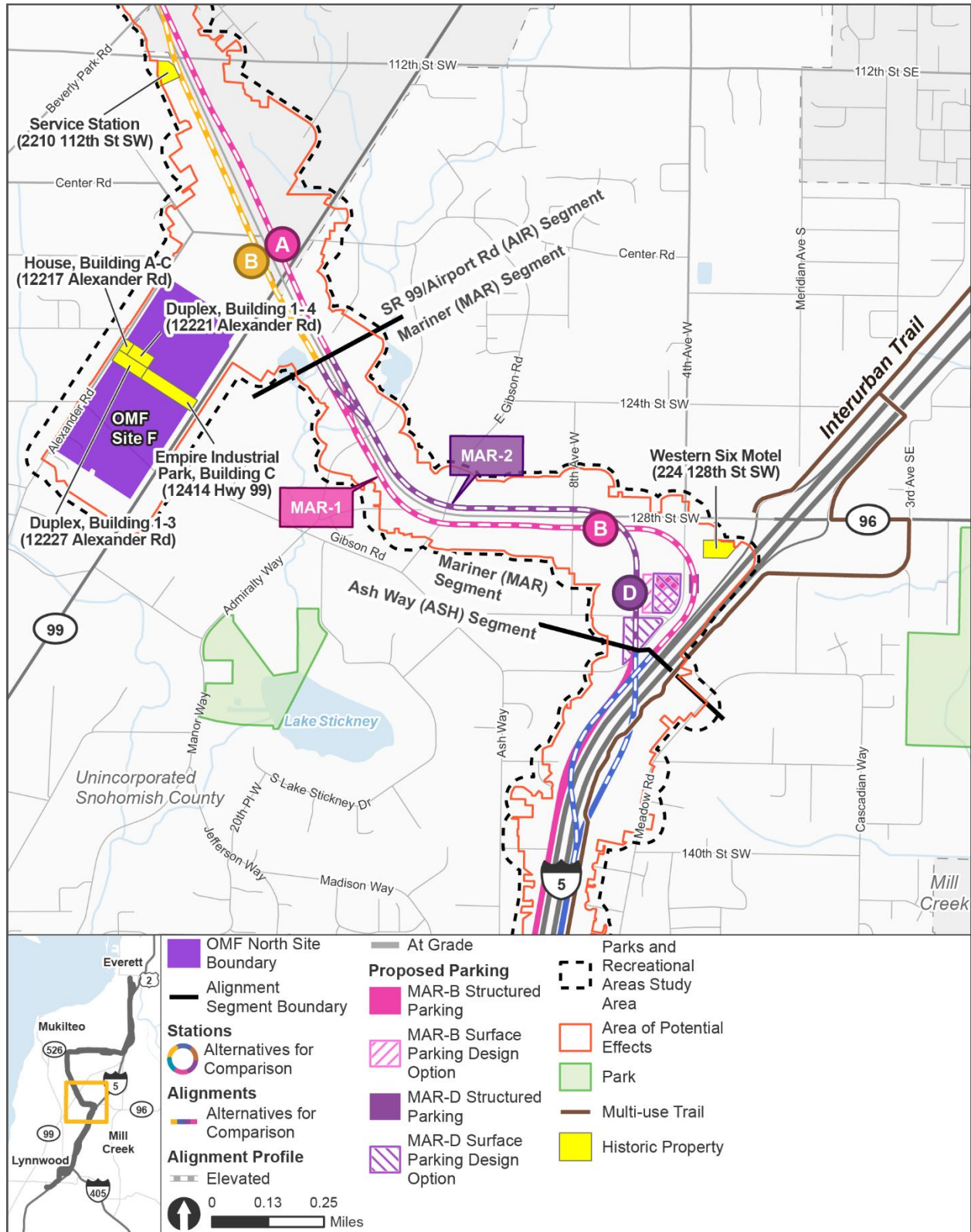
3.3.2 Historic Properties

The one historic property within the study area in the Mariner Segment is described in Table H3-5.

Table H3-5 Section 4(f) Historic Properties – Mariner Segment

Historic Name	Address	Year Built	NRHP Eligibility Status
Western Six Motel	224 128th St SW Everett, WA 98204	1978	Eligible

Figure H3-4 Section 4(f) Properties – Mariner Segment



SOURCE: Snohomish County (2023).

3.4 SR 99/Airport Road Segment and OMF Sites F and E

3.4.1 Parks and Recreational Areas

No Section 4(f) park and recreational areas were identified within the study area in the SR 99/Airport Road Segment.

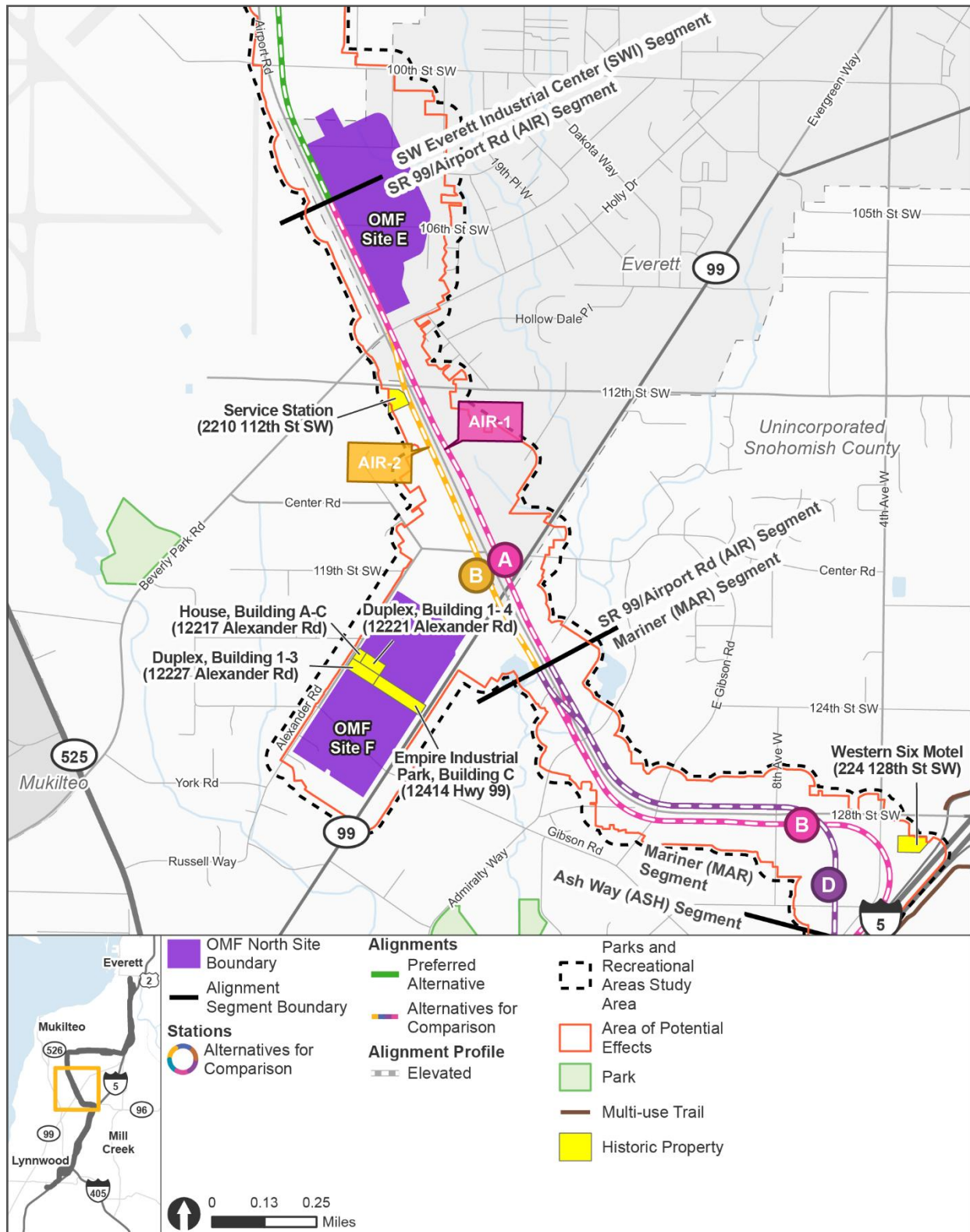
3.4.2 Historic Properties

The 12 historic properties within the study area in the SR 99/Airport Road Segment and around OMF Sites F and E are described in Table H3-6.

Table H3-6 Section 4(f) Historic Properties – SR 99/Airport Road Segment and OMF Sites F and E

Historic Name	Address	Year Built	NRHP Eligibility Status
Duplex, Building 1	12221 Alexander Road Everett, WA 98204	1945	Contributing resource to an eligible historic district
Duplex, Building 2	12221 Alexander Road Everett, WA 98204	1941	Contributing resource to an eligible historic district
Duplex, Building 3	12221 Alexander Road Everett, WA 98204	1941	Contributing resource to an eligible historic district
Duplex, Building 4	12221 Alexander Road Everett, WA 98204	1941	Contributing resource to an eligible historic district
Duplex, Building 1	12227 Alexander Road Everett, WA 98204	1941	Contributing resource to an eligible historic district
Duplex, Building 2	12227 Alexander Road Everett, WA 98204	1941	Contributing resource to an eligible historic district
Duplex, Building 3	12227 Alexander Road Everett, WA 98204	1941	Contributing resource to an eligible historic district
House, Building A	12217 Alexander Road Everett, WA 98204	1941	Contributing resource to an eligible historic district
House, Building B	12217 Alexander Road Everett, WA 98204	1941	Contributing resource to an eligible historic district
House, Building C	12217 Alexander Road Everett, WA 98204	1941	Contributing resource to an eligible historic district
Empire Industrial Park, Building C	12414 Highway 99 Everett, WA 98204	1969	Eligible
Service Station	2210 112th Street SW Everett, WA 98204	1969	Eligible

Figure H3-5 Section 4(f) Properties – SR 99/Airport Road Segment and OMF Sites F and E



SOURCE: Snohomish County (2023).

3.5 SW Everett Industrial Center Segment and OMF Site E

3.5.1 Parks and Recreational Areas

No Section 4(f) park and recreational areas were identified within the study area in the SW Everett Industrial Center Segment and around OMF Site E.

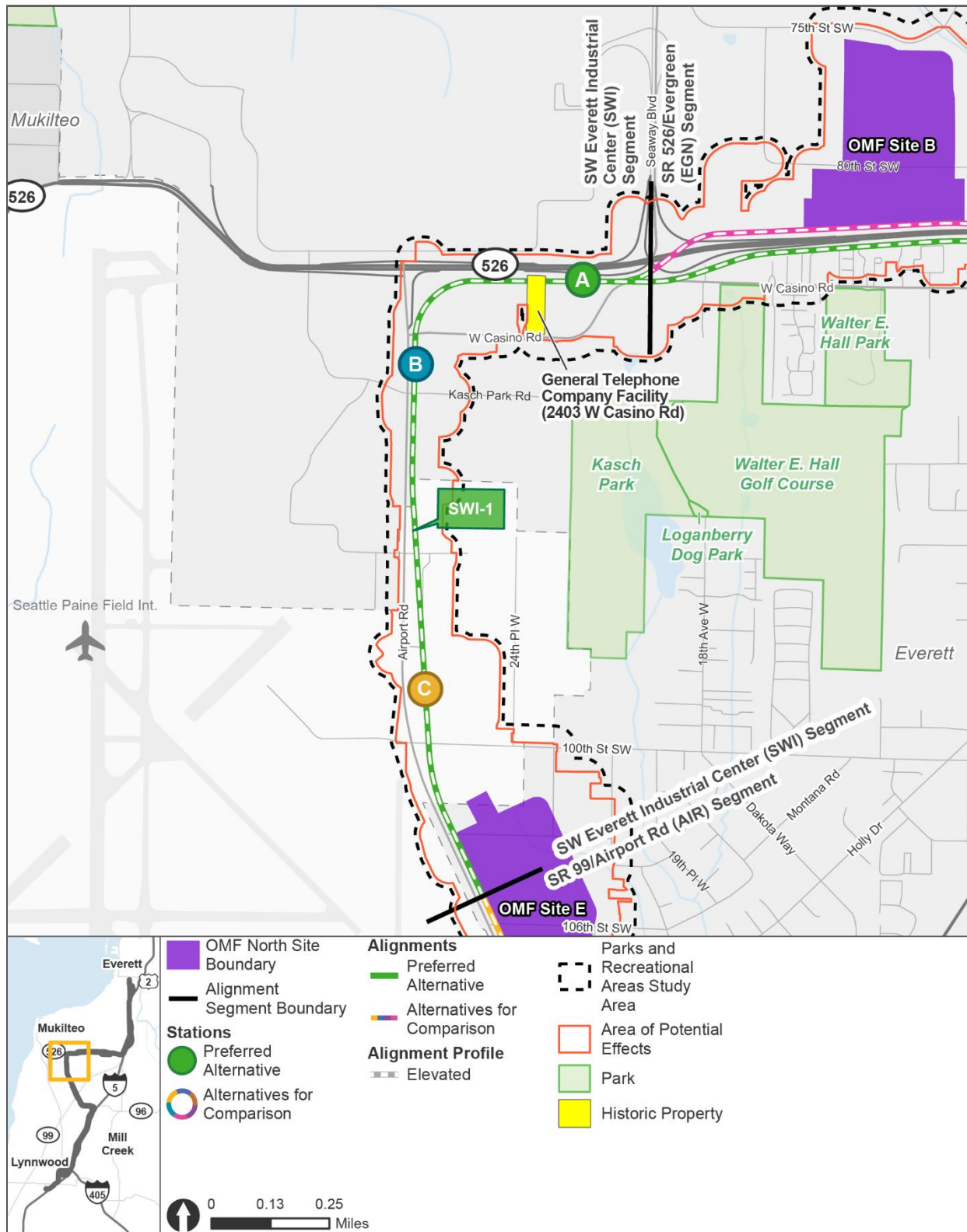
3.5.2 Historic Properties

The one historic property within the study area in the SW Everett Industrial Center and around OMF Site E is described in Table H3-7.

Table H3-7 Section 4(f) Historic Properties – SW Everett Industrial Center Segment and OMF Site E

Historic Name	Address	Year Built	NRHP Eligibility Status
General Telephone Company Facility	2403 W Casino Road Everett, WA 98204	1967	Eligible

Figure H3-6 Section 4(f) Properties – SW Everett Industrial Center Segment and OMF Site E



SOURCE: City of Everett (2024).

3.6 SR 526/Evergreen Segment and OMF Site B

3.6.1 Parks and Recreational Areas

The three Section 4(f) park and recreational areas within the study area in the SR 526/Evergreen Segment and around OMF Site B are described in Table H3-8.

The Interurban Trail within the SR 526/Evergreen Segment includes sections that are on-street bicycle lanes, sections which occupy the transportation right-of-way, and sections located within the SnoPUD right-of-way. The Interurban Trail is identified in the *City of Everett 2044 Comprehensive Plan, Transportation Element* (City of Everett 2021), which indicates the trail is part of the local transportation system in this segment. However, the trail is also identified in the *Parks and Recreation Element* and the *Everett Parks, Recreation, and Open Space Plan* (City of Everett 2022) that indicates the trail is part of the local recreational network; therefore, the trail does not function primarily for transportation and the exception criteria in 23 CFR 774.13(f)(4) does not apply.

Only portions of trail facilities that occupy existing transportation rights-of-way (i.e., streets or highways) qualify for the exception under 23 CFR 774.13(f)(3). Segments of the trail located within utility or other non-transportation corridors remain subject to Section 4(f) because they do not occupy a transportation facility right-of-way. As such, portions of the Interurban Trail in the SR 526/Evergreen Segment that are on-street bicycle lanes and sections which occupy the transportation right-of-way (0.9 miles) would not be subject to the requirement for Section 4(f) approval because they meet the exception criteria in 23 CFR 774.13(f)(3) (see Section 1.4.3). Portions of the trail located within SnoPUD right-of-way (0.2 miles) would be subject to the requirements for Section 4(f) approval.

Table H3-8 Section 4(f) Park and Recreational Areas – SR 526/Evergreen Segment and OMF Site B

Park and Recreational Area	OWJ	Location	Activities, Features, and Attributes
Interurban Trail	City of Everett, City of Lynnwood, Snohomish County	Generally parallel to I-5 between north Seattle and Everett	An 11.8-mile paved multi-use trail, 1.1 miles of which are located in the SR 526/Evergreen Segment, primarily separated from motorized traffic but with portions of on-street bicycle lanes. The Interurban Trail was established in the mid-1990s and follows the former Interurban Trolley route, which ran from Seattle to Everett from 1910 through 1939. Within the SR 526/Evergreen Segment, 0.2 miles of the Interurban Trail are subject to the requirements for Section 4(f) approval.
Walter E. Hall Golf Course	City of Everett	1266 W Casino Road Everett, WA 98024	An 18-hole, 121-acre public golf course established in 1972. The golf course includes a clubhouse and practice area, but no driving range.

Park and Recreational Area	OWJ	Location	Activities, Features, and Attributes
Walter E. Hall Park	City of Everett	1226 W Casino Road Everett, WA 98204	A 21-acre urban neighborhood park with a baseball/softball field, playground, skate park, open field space, and restroom.

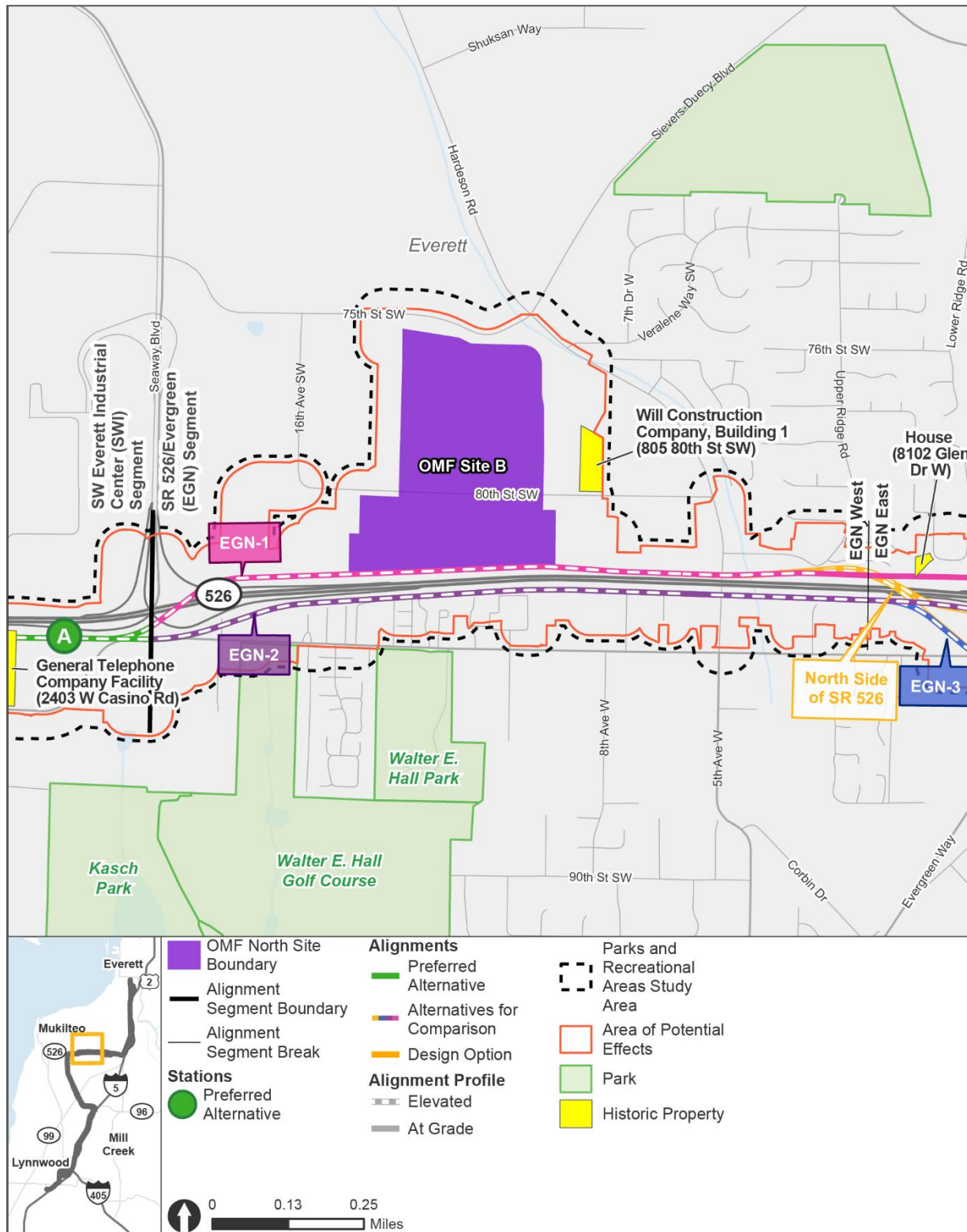
3.6.2 Historic Properties

The five historic properties within the study area in the SR 526/Evergreen Segment and around OMF Site B are described in Table H3-9.

Table H3-9 Section 4(f) Historic Properties – SR 526/Evergreen Segment and OMF Site B

Historic Name	Address	Year Built	NRHP Eligibility Status
Bank Building	8500 Evergreen Way Everett, WA 98204	1976	Eligible
General Telephone Company	426 E Casino Road Everett, WA 98204	1970	Eligible
House	1322 Ballew Avenue Everett, WA 98203	1952	Eligible
House	8102 W Glen Drive Everett, WA 98203	1968	Eligible
Will Construction Company, Building 1	805 80th Street SW Everett, WA 98203	1973	Eligible

Figure H3-7 Section 4(f) Properties – SR 526/Evergreen Segment (West) and OMF Site B



SOURCE: City of Everett (2024).

Figure H3-8 Section 4(f) Properties – SR 526/Evergreen Way Segment (East)



SOURCE: City of Everett (2024); Snohomish County (2023).

3.7 Broadway/I-5 Segment

3.7.1 Parks and Recreational Areas

The one Section 4(f) recreational area within the study area in the Broadway/I-5 Segment is described in Table H3-10. Within the study area in the Broadway/I-5 Segment, the Interurban Trail is primarily an on-street bicycle lane and also includes a section located within the SnoPUD right-of-way. The Interurban Trail is identified in the *City of Everett 2044 Comprehensive Plan, Transportation Element* (City of Everett 2021), which indicates the trail is part of the local transportation system in this segment. However, the trail is also identified in the *Parks and Recreation Element* and the *Everett Parks, Recreation, and Open Space Plan* (City of Everett 2022) that indicates the trail is part of the local recreational network; therefore, the trail does not function primarily for transportation and the exception criteria in 23 CFR 774.13(f)(4) does not apply.

Only portions of trail facilities that occupy existing transportation rights-of-way (i.e., streets or highways) qualify for the exception under 23 CFR 774.13(f)(3). Segments of the trail located within utility or other non-transportation corridors remain subject to Section 4(f) because they do not occupy a transportation facility right of way. As such, portions of the Interurban Trail that are on-street bicycle lanes (0.4 miles) would not be subject to the requirement for Section 4(f) approval because they meet the exception criteria in 23 CFR 774.13(f)(3) (see Section 1.4.3). Portions of the trail which occupy SnoPUD right-of-way (0.4 miles) would be subject to the requirements for Section 4(f) approval.

Table H3-10 Section 4(f) Park and Recreational Areas – Broadway/I-5 Segment

Park and Recreational Area	OWJ	Location	Activities, Features, and Attributes
Interurban Trail	City of Everett, City of Lynnwood, Snohomish County	Generally parallel to I-5 between north Seattle and Everett	An 11.8-mile paved multi-use trail, 0.8 miles of which are located in the Broadway/I-5 Segment, primarily separated from motorized traffic but with portions of on-street bicycle lanes. The Interurban Trail was established in the mid-1990s and follows the former Interurban Trolley route, which ran from Seattle to Everett from 1910 through 1939. Within the Broadway/I-5 Segment, 0.4 miles of the Interurban Trail are subject to the requirements for Section 4(f) approval.

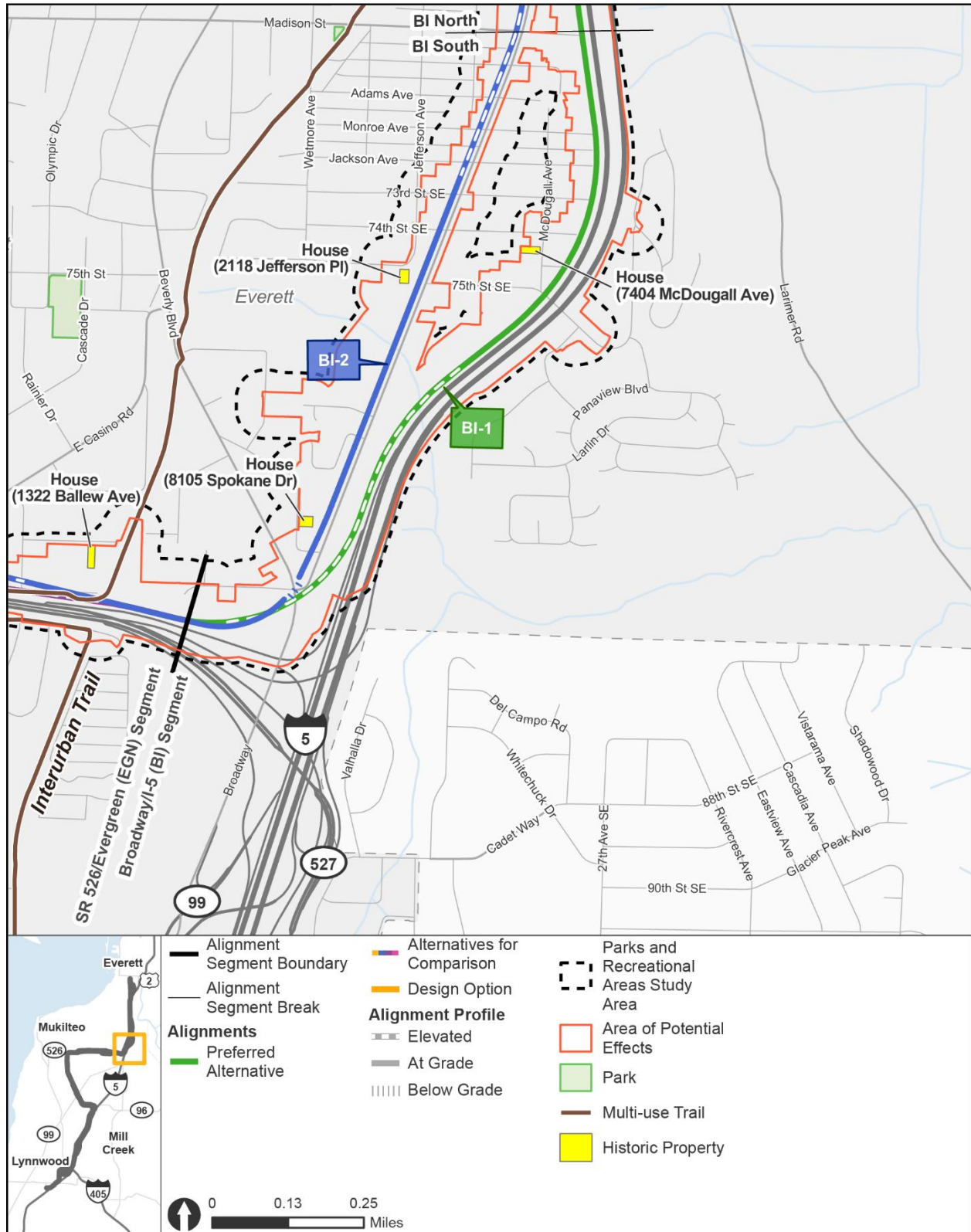
3.7.2 Historic Properties

The six historic properties within the study area in the Broadway/I-5 Segment are described in Table H3-11.

Table H3-11 Section 4(f) Historic Properties – Broadway/I-5 Segment

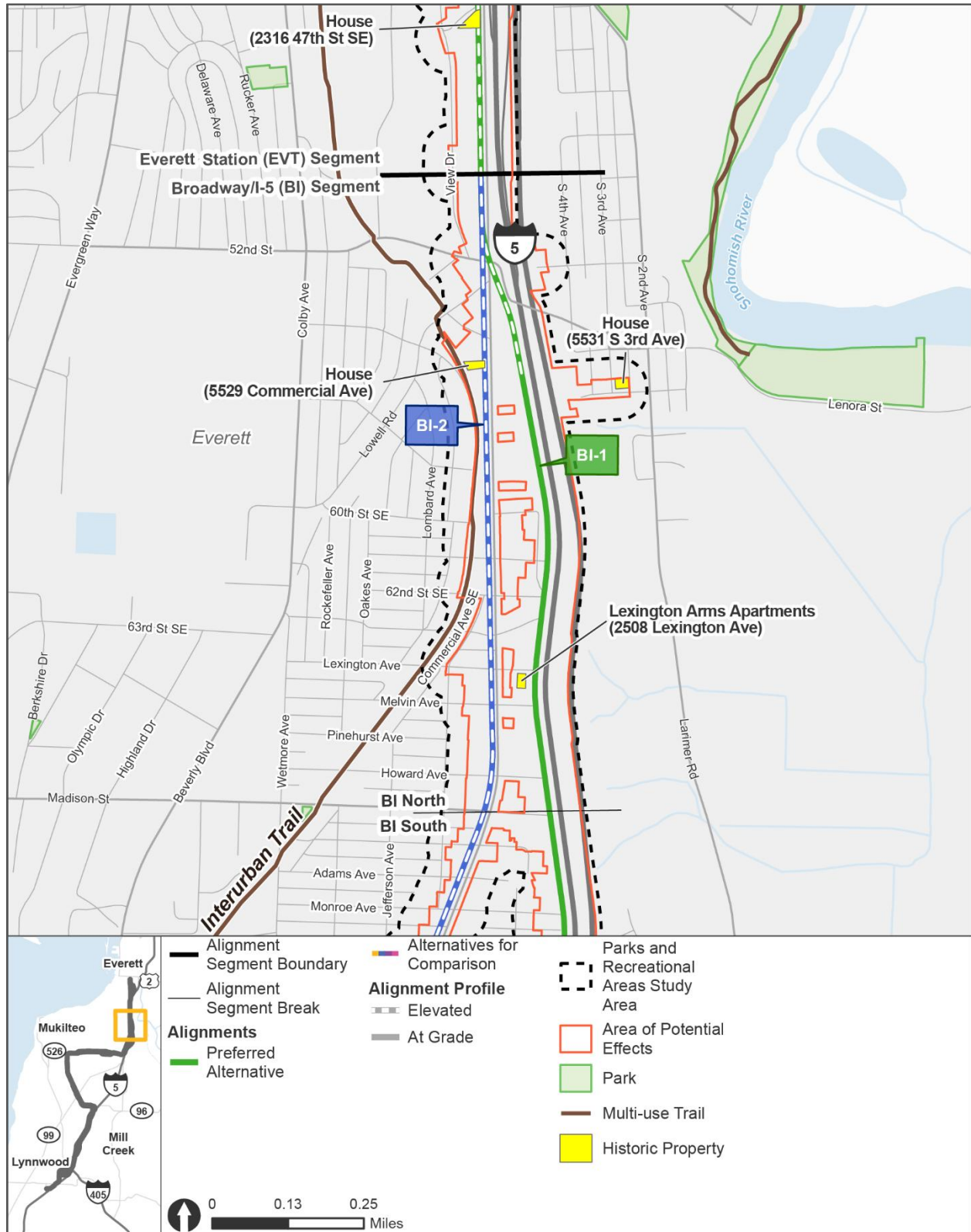
Historic Name	Address	Year Built	NRHP Eligibility Status
House	5529 Commercial Avenue Everett, WA 98203	1960	Eligible
House	2118 Jefferson Place Everett, WA 98203	1958	Eligible
House	7404 McDougall Avenue Everett, WA 98203	1971	Eligible
House	8105 Spokane Drive Everett, WA 98203	1970	Eligible
House	5531 S 3rd Avenue Everett, WA 98203	1925	Eligible
Lexington Arms Apartments	2508 Lexington Avenue Everett, WA 98203	1969	Eligible

Figure H3-9 Section 4(f) Properties – Broadway/I-5 Segment (South)



SOURCE: City of Everett (2024).

Figure H3-10 Section 4(f) Properties – Broadway/I-5 Segment (North)



SOURCE: City of Everett (2024); Snohomish County (2023).

3.8 Everett Station Segment

3.8.1 Parks and Recreational Areas

Section 4(f) does not apply to park and recreational areas when the OWJ has determined that the property, considered in its entirety, is not significant. James J. Hill Park (Hewitt Avenue and Broadway) is a 0.1-acre park located north of downtown Everett within the Everett Station Segment. It is classified by the City of Everett as a “Garden/Gateway” park. It was established in 1976 and includes a few trees, landscaping rocks, and lawn. The City of Everett, as the OWJ, concurred that James J. Hill Park is not a public park of national, state, or local significance, and, therefore, Section 4(f) does not apply. Correspondence is documented in Section 8 and Attachment A.

No Section 4(f) park and recreational areas were identified within the study area in the Everett Station Segment.

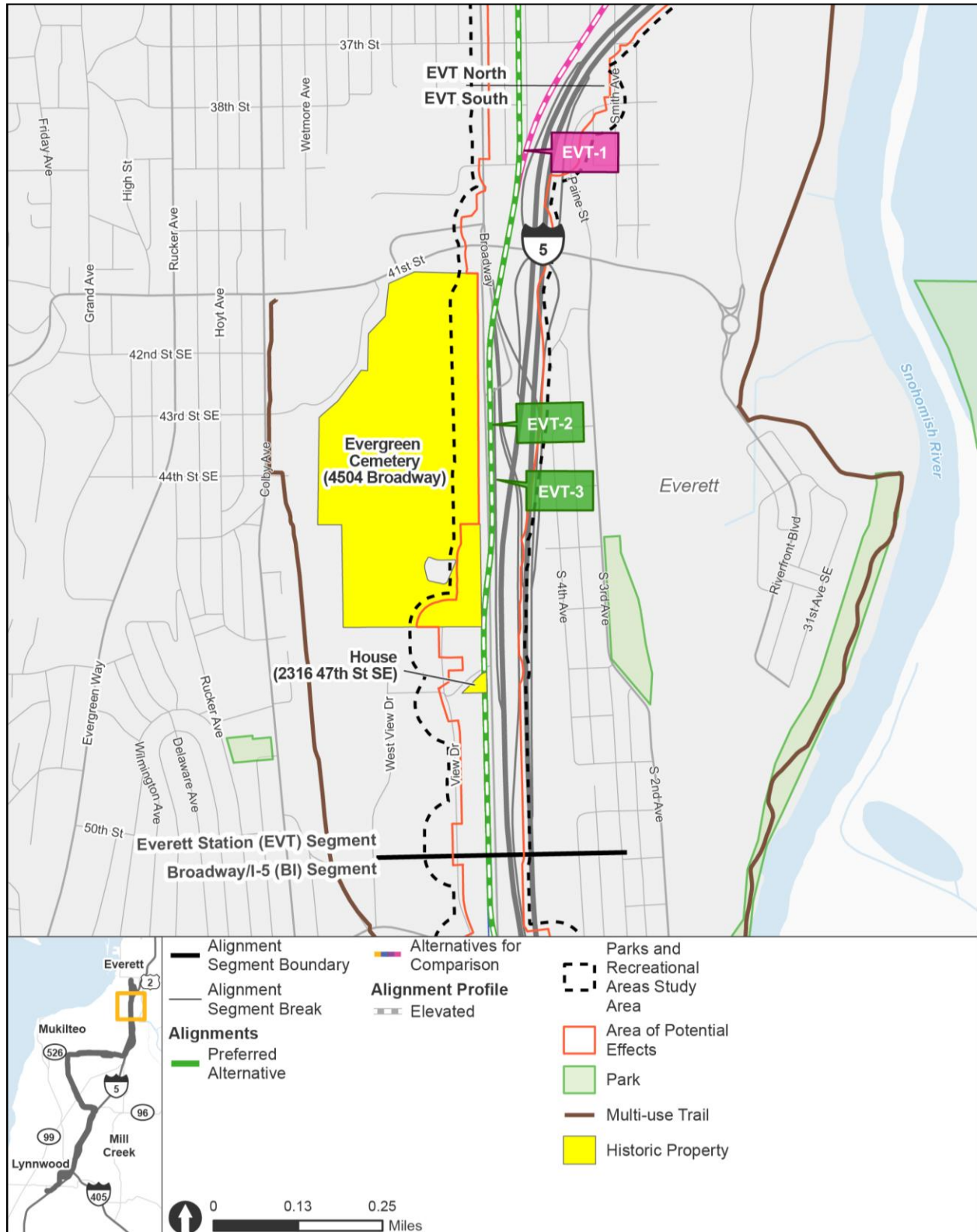
3.8.2 Historic Properties

The eight historic properties within the study area in the Everett Station Segment are described in Table H3-12.

Table H3-12 Section 4(f) Historic Properties – Everett Station Segment

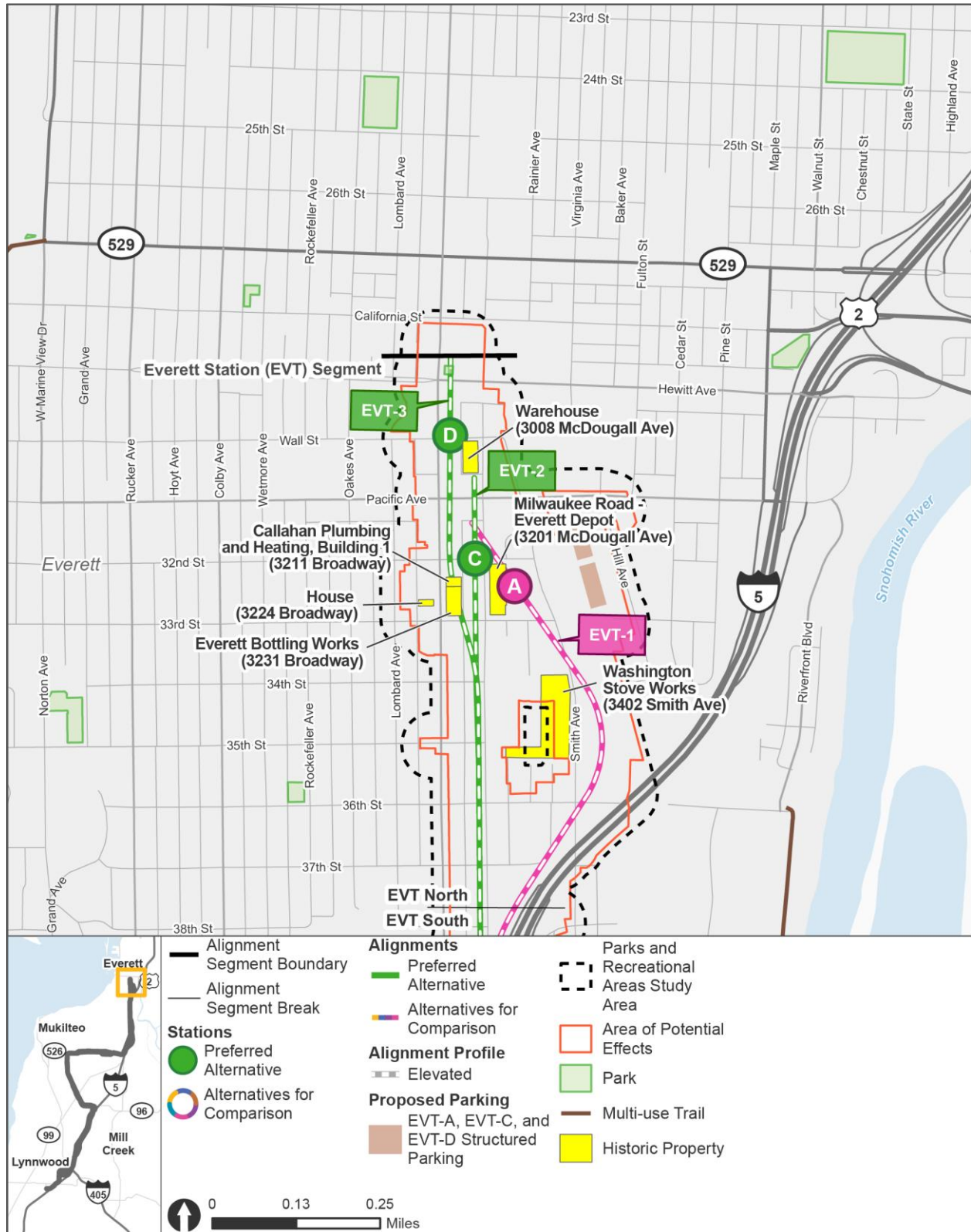
Historic Name	Address	Year Built	NRHP Eligibility Status
Callahan Plumbing and Heating, Building 1	3211 Broadway Everett, WA 98201	1955	Eligible
Everett Bottling Works	3231 Broadway Everett, WA 98201	1921	Eligible
Evergreen Cemetery	4504 Broadway Everett, WA 98203	1898-1965	Eligible
House	3224 Broadway Everett, WA 98201	1901	Eligible
House	2316 47th Street SE Everett, WA 98203	1970	Eligible
Milwaukee Road – Everett Depot	3201 McDougall Avenue Everett, WA 98201	1910	Eligible
Warehouse	3008 McDougall Avenue Everett, WA 98201	1946	Eligible
Washington Stove Works	3402 Smith Avenue Everett, WA 98201	1904	Eligible

Figure H3-11 Section 4(f) Properties – Everett Station Segment (South)



SOURCE: City of Everett (2024); Snohomish County (2023).

Figure H3-12 Section 4(f) Properties – Everett Station Segment (North)



SOURCE: City of Everett (2024); Snohomish County (2023).

4 USE OF SECTION 4(F) PROPERTIES

This section assesses potential impacts to Section 4(f) properties within the study area and provides preliminary determinations as to whether impacts would result in a use of that property under Section 4(f). The Final Section 4(f) Evaluation will be prepared after public review and comment on the Draft EIS and continued consultation with OWJ. This will be prepared in conjunction with the Final EIS for this project.

For historic properties, the Section 4(f) evaluation considered potential effects under Section 106. Section 106 effect determinations have been made for two properties that would be adversely affected by all Build Alternatives within a segment (Pioneer First Federal Savings and Loan at 4111 Alderwood Mall Boulevard in the West Alderwood Segment and a house at 2316 47th Street SE in the Everett Station Segment). All other Section 106 effect determinations are preliminary; final effect determinations are pending additional consultation with the SHPO, Tribes, and other consulting parties. See the Historic and Archaeological Resources Technical Report in Draft EIS Appendix G.17 for more information on the Section 106 process.

For the discussion in this section, if a Section 4(f) property is referred to as “not impacted,” it means that the particular property would not have property permanently incorporated or temporarily occupied by any alternative, nor would there be a constructive use.

4.1 Multiple Segments

4.1.1 Parks and Recreational Areas

4.1.1.1 Interurban Trail

The Build Alternatives in the West Alderwood, Ash Way, SR 526/Evergreen, and Broadway/I-5 Segments would construct guideway adjacent to or crossing over the Interurban Trail. A discussion of impacts related to each of these alternatives is included below, and the preliminary use determinations for the Interurban Trail are summarized by alternative in Table H4-1. Figure H4-1 through Figure H4-5 show the portions of the trail that are subject to Section 4(f) and the portions that meet the exception criteria for Section 4(f) approval in 23 CFR 774.13(f) (see Section 1.4.3).

West Alderwood Segment

Alternatives ALD-1B, ALD-2D, and ALD-2F

Alternatives ALD-1B, ALD-2D, and ALD-2F would construct an elevated guideway crossing over the Interurban Trail near 40th Avenue W and then run parallel to the trail between 40th Avenue W and 33rd Avenue W. These alternatives would require approximately 250 linear feet of trail realignment to a portion of the Interurban Trail between 40th Avenue W and 36th Avenue W to accommodate a hi-rail access road.² The realigned trail would remain on SnoPUD property. The elevated guideway would require an air space lease in this location.

² Hi-rail vehicles are specialized vehicles that can operate on both rail tracks and along conventional roads. These vehicles are used for track, guideway, and overhead catenary system inspection and maintenance.

These alternatives would require temporary construction easements that would impact the Interurban Trail; however, detours would be provided to bypass any temporarily closed areas. Any areas of the trail that are disturbed would be restored to existing conditions or better or replaced, in coordination with the OWJ. This temporary occupancy would not constitute a Section 4(f) use because it would meet the exception criteria in 23 CFR 774.13(d) (see Section 1.3).

Alternatives ALD-1B, ALD-2D, and ALD-2F would change the visual setting and result in an increase in noise and vibration for portions of the trail adjacent to the guideway.³ However, these proximity impacts would not substantially impair the activities, features, and attributes of the trail and therefore would not be a constructive use.

Preliminary Determination: Alternatives ALD-1B, ALD-2D, and ALD-2F would not adversely affect the activities, features, and attributes of the Interurban Trail, and the temporary occupancy would not constitute a use because it satisfies the exception criteria. See Attachment A for documented concurrence from the City of Lynnwood.

Alderwood Mall Boulevard Design Option

With the Alderwood Mall Boulevard Design Option, the elevated guideway would cross over the Interurban Trail near 40th Avenue W and then run parallel to the trail between 40th Avenue W and 36th Avenue W, before crossing back over the trail. This alignment design option would require approximately 250 linear feet of trail realignment of a portion of the Interurban Trail between 40th Avenue W and 36th Avenue W to accommodate the guideway. The realigned trail would remain on SnoPUD property. The elevated guideway would require an air space lease in this location.

The Alderwood Mall Boulevard Design Option would require temporary construction easements that would impact the Interurban Trail; however, detours would be provided to bypass any temporarily closed areas. Any areas of the trail that are disturbed would be restored to existing conditions or better or replaced, in coordination with the OWJ. This temporary occupancy would not constitute a Section 4(f) use because it would meet the exception criteria in 23 CFR 774.13(d) (see Section 1.3).

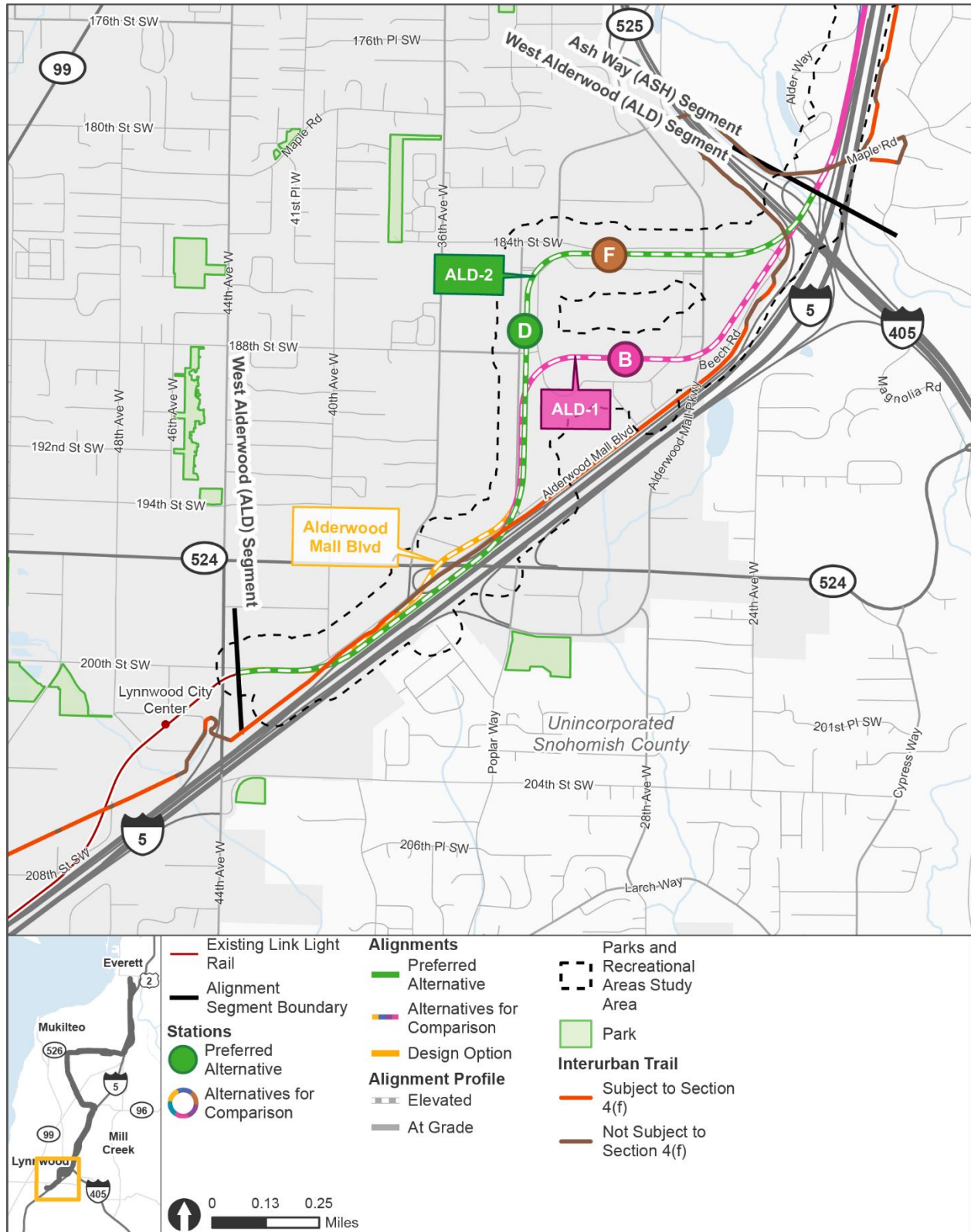
The Alderwood Mall Boulevard Design Option would change the visual setting and result in an increase in noise and vibration for portions of the trail adjacent to the guideway.⁴ However, these proximity impacts would not substantially impair the activities, features, and attributes of the trail and therefore would not be a constructive use.

Preliminary Determination: The Alderwood Mall Boulevard Design Option would not adversely affect the activities, features, and attributes of the Interurban Trail, and the temporary occupancy would not constitute a use because it satisfies the exception criteria. See Attachment A for documented concurrence from the City of Lynnwood.

³ For more information on visual impacts, see the Visual and Aesthetic Resources Technical Report in Draft EIS Appendix G.6. For more information on noise and vibration impacts, see the Noise and Vibration Technical Report in Draft EIS Appendix G.8.

⁴ For more information on visual impacts, see the Visual and Aesthetic Resources Technical Report in Draft EIS Appendix G.6. For more information on noise and vibration impacts, see the Noise and Vibration Technical Report in Draft EIS Appendix G.8.

Figure H4-1 Interurban Trail – West Alderwood Segment



SOURCE: City of Lynnwood (2023); Snohomish County (2023).

Ash Way Segment

Alternative ASH-1A

Alternative ASH-1A would construct elevated guideway crossing over the Interurban Trail just north of SR 525 and west of I-5. In this location, the trail is an on-street bicycle lane on Maple Road and would not be subject to the requirement for Section 4(f) approval because it meets the exception criteria in 23 CFR 774.13(f) (see Section 1.4.3).

Preliminary Determination: Alternative ASH-1A would not result in a Section 4(f) use of the Interurban Trail.

Alternative ASH-2D

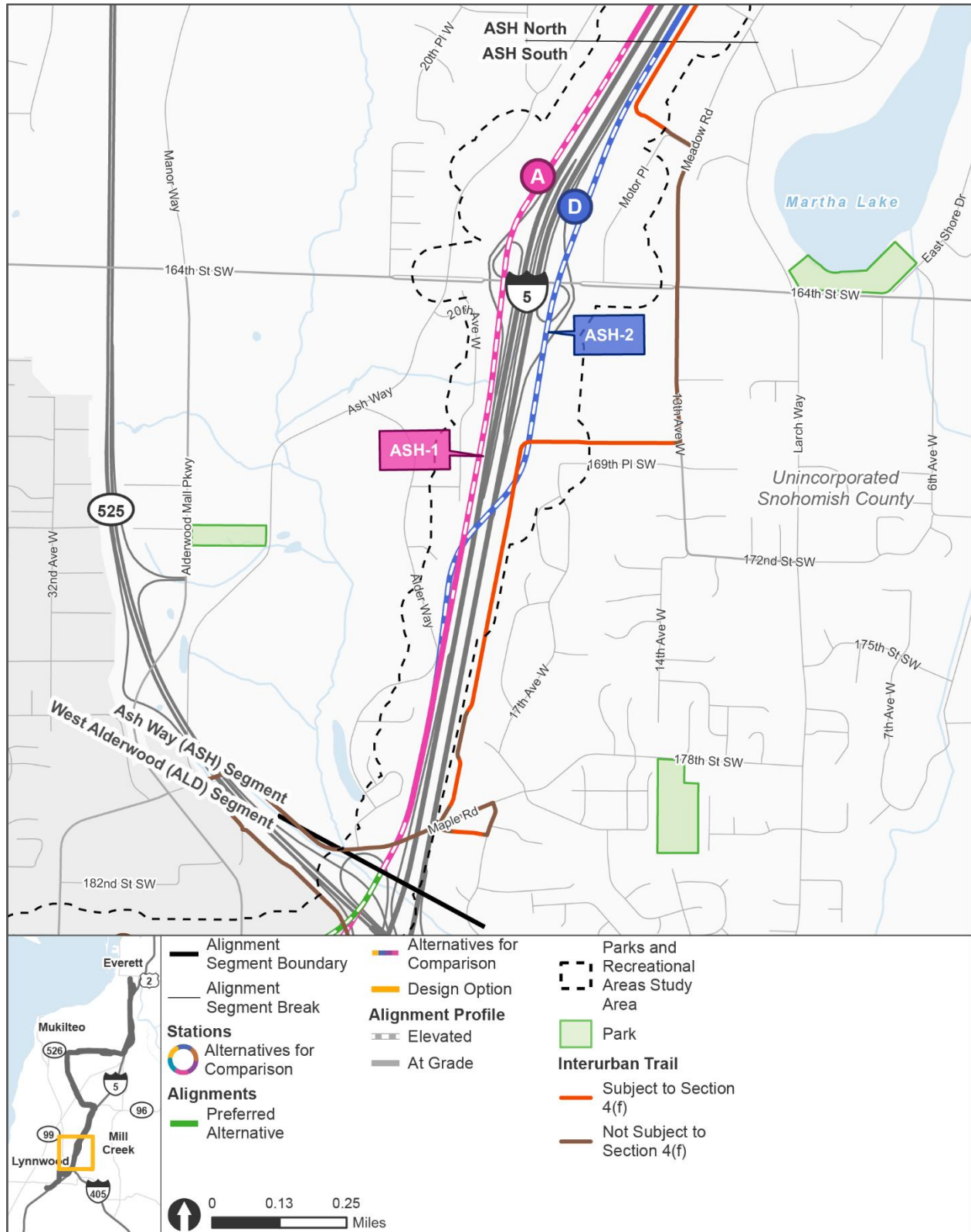
Alternative ASH-2D includes elevated guideway that would cross over the Interurban Trail near 169th Place SW. The trail then turns to the east and continues north along Meadow Road until 160th Street SW where it turns west and then continues north adjacent to I-5. The guideway would run parallel to the trail between approximately 160th Street SW and 140th Street SW. Between 140th Street SW and 137th Street SW, approximately 1,200 linear feet of the trail, which is subject to Section 4(f), would be relocated to maintain sufficient vertical clearance between the elevated guideway and trail. Approximately 150 linear feet of this segment that is subject to Section 4(f) would be relocated within SnoPUD property. The remaining approximately 1,050 linear feet of trail that is within transportation right-of-way would be relocated within property acquired for the guideway before returning to transportation right-of-way. This alternative would change the visual setting of the trail and noise and vibration in the vicinity of the guideway.⁵ However, these proximity impacts would not substantially impair the activities, features, and attributes of the trail and therefore would not be a constructive use.

Alternative ASH-2D would require temporary construction easements that would impact the Interurban Trail; however, detours would be provided to bypass any temporarily closed areas. Any areas of the trail that are disturbed would be restored to existing conditions or better or replaced, in coordination with the OWJ. This temporary occupancy would not constitute a Section 4(f) use because it would meet the exception criteria in 23 CFR 774.13(d) (see Section 1.3).

Preliminary Determination: Alternative ASH-2D would not adversely affect the activities, features, and attributes of the Interurban Trail, and the temporary occupancy would not constitute a use because it satisfies the exception criteria. See Attachment A for documented concurrence from Snohomish County.

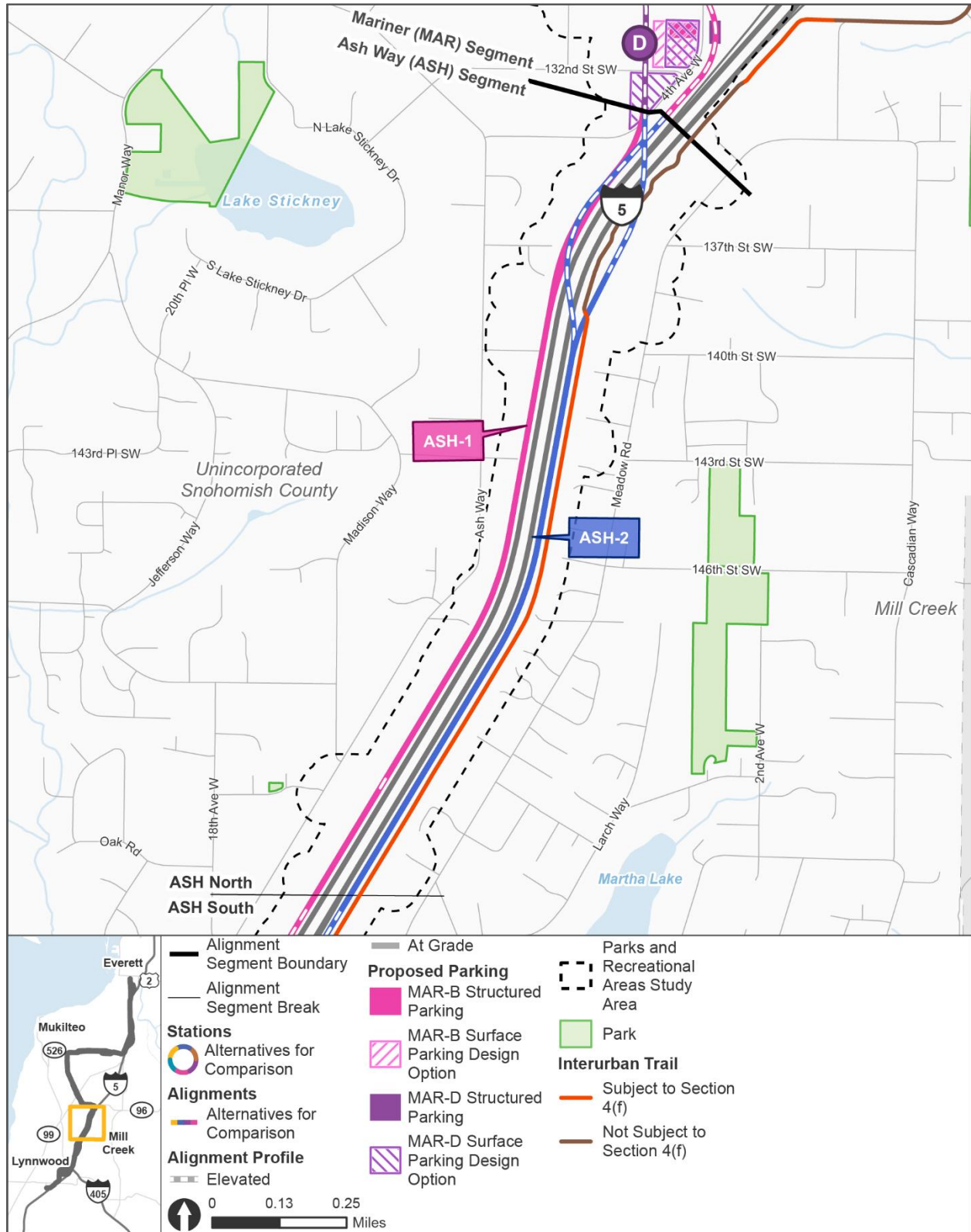
⁵ For more information on visual impacts, see the Visual and Aesthetic Resources Technical Report in Draft EIS Appendix G.6. For more information on noise and vibration impacts, see the Noise and Vibration Technical Report in Draft EIS Appendix G.8.

Figure H4-2 Interurban Trail – Ash Way Segment (South)



SOURCE: Snohomish County (2023).

Figure H4-3 Interurban Trail – Ash Way Segment (North)



SOURCE: Snohomish County (2023).

SR 526/Evergreen Segment*Alternatives EGN-1A, EGN-2B, and EGN-2B with North Side of SR 526 Design Option*

Alternatives EGN-1A, EGN-2B, and EGN-2B with North Side of SR 526 Design Option would include elevated guideway parallel to the Interurban Trail between E Casino Road and the SnoPUD corridor, north of SR 526 where the trail is within transportation right-of-way. These alternatives would require approximately 2,200 linear feet of the trail to be realigned within transportation right-of-way. This portion of the trail would not be subject to the requirement for Section 4(f) approval because it meets the exception criteria in 23 CFR 774.13(f) (see Section 1.4.3).

Preliminary determination: Alternatives EGN-1A, EGN-2B, and EGN-2B with North Side of SR 526 Design Option would not result in a Section 4(f) use of the Interurban Trail.

Alternatives EGN-3E and EGN-3E with North Side of SR 526 Design Option

Alternatives EGN-3E and EGN-3E with North Side of SR 526 Design Option include elevated guideway parallel to the Interurban Trail between 7th Avenue SE and 9th Avenue SE where the trail is an on-street bicycle lane on 84th Street SE, south of SR 526. On the north side of SR 526 between E Casino Road and the SnoPUD corridor, approximately 1,700 linear feet of trail would be realigned within transportation right-of-way to accommodate the elevated guideway. This portion of the trail would not be subject to the requirement for Section 4(f) approval because it meets the exception criteria in 23 CFR 774.13(f) (see Section 1.4.3).

Preliminary Determination: Alternatives EGN-3E and EGN-3E with North Side of SR 526 Design Option would not result in a Section 4(f) use of the Interurban Trail.

Figure H4-4 Interurban Trail – SR 526/Evergreen Segment (East)



SOURCE: City of Everett (2024); Snohomish County (2023).

Broadway/I-5 Segment

Alternative BI-1

Alternative BI-1 would not impact the Interurban Trail; therefore, there would be no Section 4(f) use.

Alternative BI-2

Alternative BI-2 would not impact the Interurban Trail; therefore, there would be no Section 4(f) use.

Figure H4-5 Interurban Trail – Broadway/I-5 Segment (North)



SOURCE: City of Everett (2024); Snohomish County (2023).

Table H4-1 Preliminary Section 4(f) Use Determinations – Interurban Trail

Segment	Build Alternative	Preliminary Use Determination
West Alderwood	ALD-1B	No use (temporary occupancy)
	ALD-1B with Alderwood Mall Boulevard Design Option	No use (temporary occupancy)
	ALD-2D	No use (temporary occupancy)
	ALD-2D with Alderwood Mall Boulevard Design Option	No use (temporary occupancy)
	ALD-2F	No use (temporary occupancy)
	ALD-2F with Alderwood Mall Boulevard Design Option	No use (temporary occupancy)
Ash Way	ASH-1A	No use (not subject to Section 4(f) approval)
	ASH-2D	No use (temporary occupancy)
SR 526/ Evergreen	EGN-1A	No use (not subject to Section 4(f) approval)
	EGN-2B	No use (not subject to Section 4(f) approval)
	EGN-2B with North Side of SR 526 Design Option	No use (not subject to Section 4(f) approval)
	EGN-3E	No use (not subject to Section 4(f) approval)
	EGN-3E with North Side of SR 526 Design Option	No use (not subject to Section 4(f) approval)
Broadway/ I-5	BI-1	No use (no permanent or temporary impacts)
	BI-2	No use (no permanent or temporary impacts)

4.2 West Alderwood Segment

Preliminary use determinations for the Section 4(f) properties in the West Alderwood Segment are described below and summarized in Table H4-2.

4.2.1 Parks and Recreational Areas

4.2.1.1 Interurban Trail

See Section 4.1.1 for an evaluation of Section 4(f) use of the Interurban Trail.

4.2.2 Historic Properties

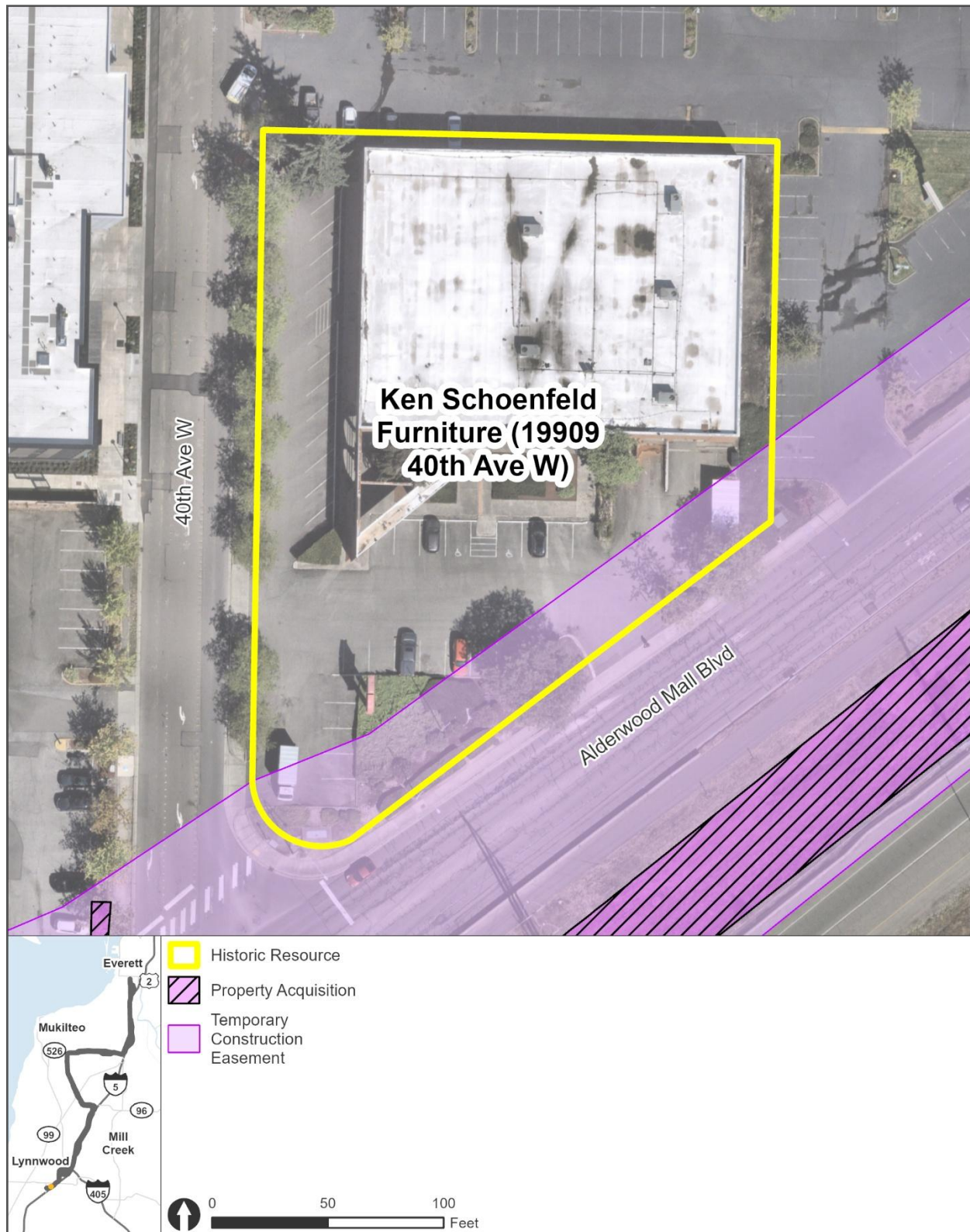
4.2.2.1 Ken Schoenfeld Furniture (19909 40th Avenue W)

Alternatives ALD-1B, ALD-1B with Alderwood Mall Boulevard Design Option, ALD-2D, ALD-2D with Alderwood Mall Boulevard Design Option, ALD-2F, and ALD-2F Alderwood Mall Boulevard Design Option

All alternatives in the West Alderwood Segment would construct elevated guideway along Alderwood Mall Boulevard, south of the Ken Schoenfeld Furniture property (see Figure H4-6). These alternatives would not require permanent acquisition of the property; however, a temporary construction easement would be required. Any areas of the property that are disturbed would be restored to existing conditions or better or replaced. FTA has preliminarily determined that the temporary construction easement would not result in an adverse effect under Section 106. This temporary occupancy is anticipated to meet the exception criteria in 23 CFR 774.13(d) (see Section 1.3) and not constitute a Section 4(f) use.

Preliminary Determination: Alternatives ALD-1B, ALD-1B with Alderwood Mall Boulevard Design Option, ALD-2D, ALD-2D with Alderwood Mall Boulevard Design Option, ALD-2F, and ALD-2F with Alderwood Mall Boulevard Design Option would not constitute a use if they satisfy the exception criteria. FTA is consulting with SHPO and anticipates concurrence that this temporary occupancy meets the criteria in 23 CFR 774.13(d). Therefore, FTA has made a preliminary determination that there will be no Section 4(f) use of this property. As part of the Final Section 4(f) Evaluation, FTA will request concurrence in writing from the SHPO.

Figure H4-6 Ken Schoenfeld Furniture (19909 40th Avenue W) – All West Alderwood Segment Alternatives



SOURCE: Snohomish County (2023).

4.2.2.2 Pacific First Federal Savings and Loan (3220 188th Street SW)

Alternatives ALD-1B and ALD-1B with Alderwood Mall Boulevard Design Option

Alternatives ALD-1B and ALD-1B with Alderwood Mall Boulevard Design Option would construct elevated guideway south of the property (see Figure H4-7). These alternatives would not require permanent acquisition of the property; however, a temporary construction easement would be required. Any areas of the property that are disturbed would be restored to existing conditions or better or replaced. FTA has preliminarily determined that the temporary construction easement of this historic property would not result in an adverse effect under Section 106. This temporary occupancy is anticipated to meet the exception criteria in 23 CFR 774.13(d) (see Section 1.3) and not constitute a Section 4(f) use.

Preliminary Determination: Alternatives ALD-1B and ALD-1B with Alderwood Mall Boulevard Design Option would not constitute a use under Section 4(f) if they satisfy the exception criteria. FTA is consulting with SHPO and anticipates concurrence that this temporary occupancy meets the criteria in 23 CFR 774.13(d). Therefore, FTA has made a preliminary determination that there will be no Section 4(f) use of this property. As part of the Final Section 4(f) Evaluation, FTA will request concurrence in writing from the SHPO.

Alternatives ALD-2D, ALD-2D with Alderwood Mall Boulevard Design Option, ALD-2F, and ALD-2F with Alderwood Mall Boulevard Design Option

Alternatives ALD-2D, ALD-2D with Alderwood Mall Boulevard Design Option, ALD-2F, and ALD-2F with Alderwood Mall Boulevard Design Option would require acquisition and demolition of the Pacific First Federal Savings and Loan building (see Figure H4-8 and Figure H4-9). FTA has preliminarily determined that the demolition of this building would result in an adverse effect under Section 106.

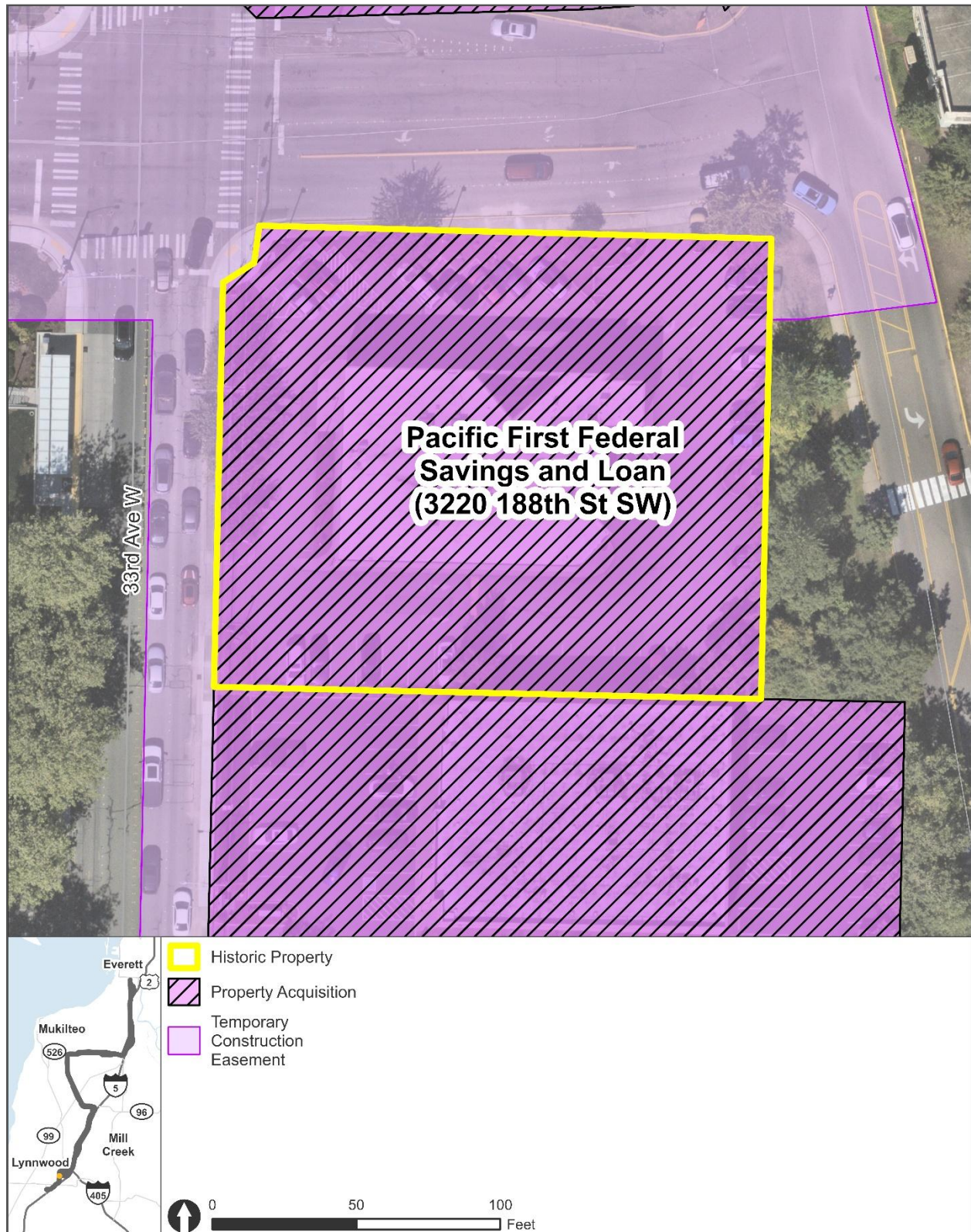
Preliminary Determination: The adverse effect under Section 106 would constitute a use of the Pacific First Federal Savings and Loan under Section 4(f).

Figure H4-7 Pacific First Federal Savings and Loan (3220 188th Street SW) – Alternative ALD-1B and ALD-1B with Alderwood Mall Boulevard Design Option



SOURCE: Snohomish County (2023).

Figure H4-8 Pacific First Federal Savings and Loan (3220 188th Street SW) – Alternative ALD-2D and ALD-2D with Alderwood Mall Boulevard Design Option



SOURCE: Snohomish County (2023).

Figure H4-9 Pacific First Federal Savings and Loan (3220 188th Street SW) – Alternative ALD-2F and ALD-2F with Alderwood Mall Boulevard Design Option



SOURCE: Snohomish County (2023).

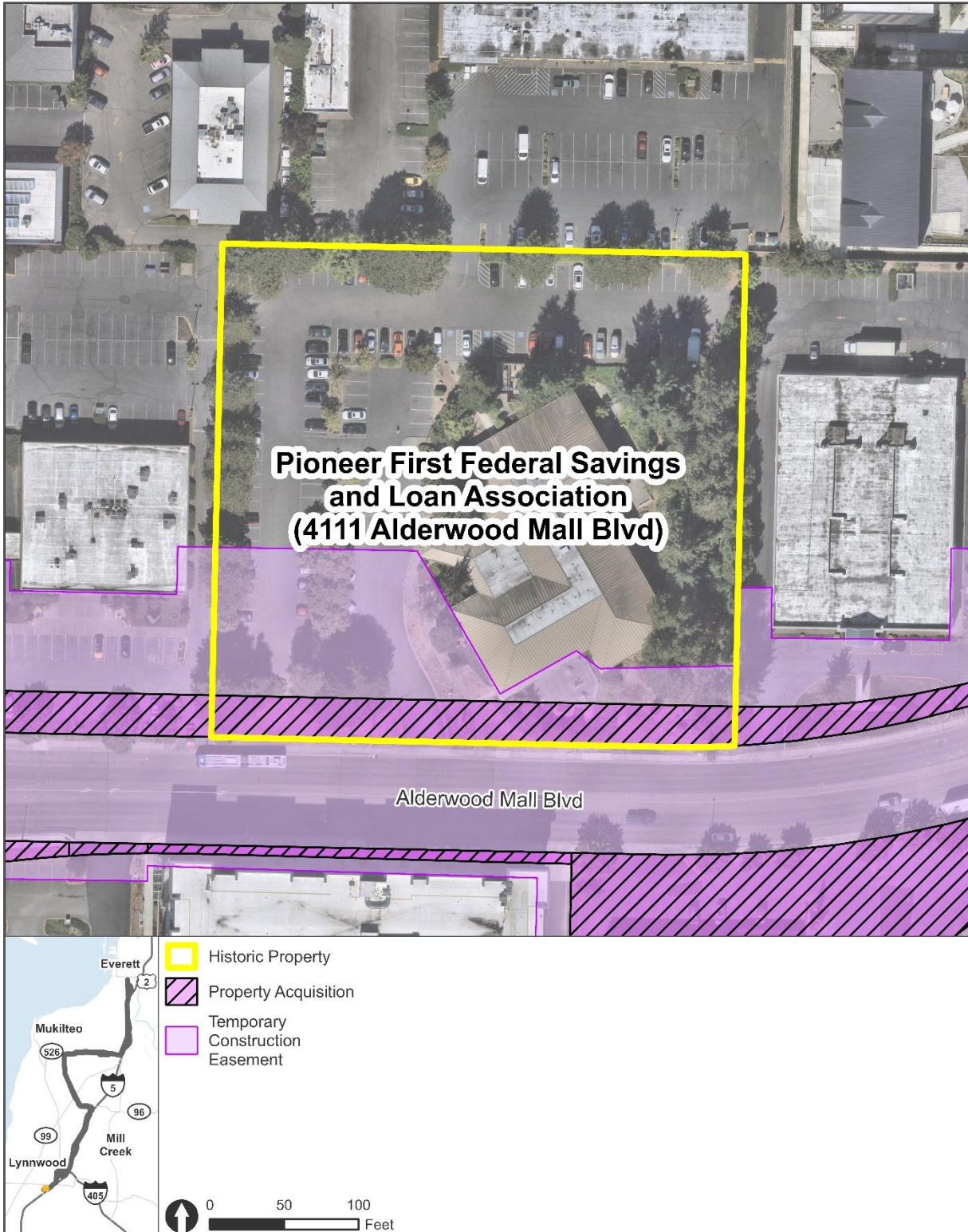
4.2.2.3 Pioneer First Federal Savings and Loan Association (4111 Alderwood Mall Blvd)

Alternatives ALD-1B, ALD-1B with Alderwood Mall Boulevard Design Option, ALD-2D, ALD-2D with Alderwood Mall Boulevard Design Option, ALD-2F, and ALD-2F with Alderwood Mall Boulevard Design Option

All alternatives in the West Alderwood Segment would construct an elevated guideway along Alderwood Mall Boulevard, south of the Pioneer First Federal Savings and Loan Association property (see Figure H4-10 and Figure H4-11). These alternatives would require partial acquisition of property along the southern parcel boundary, as well as a temporary construction easement to construct the elevated guideway. The permanent acquisition would not result in demolition of the historic property. Still, FTA, in consultation with the SHPO, has determined that the partial property acquisition and permanent proximity effects would result in an adverse effect under Section 106.

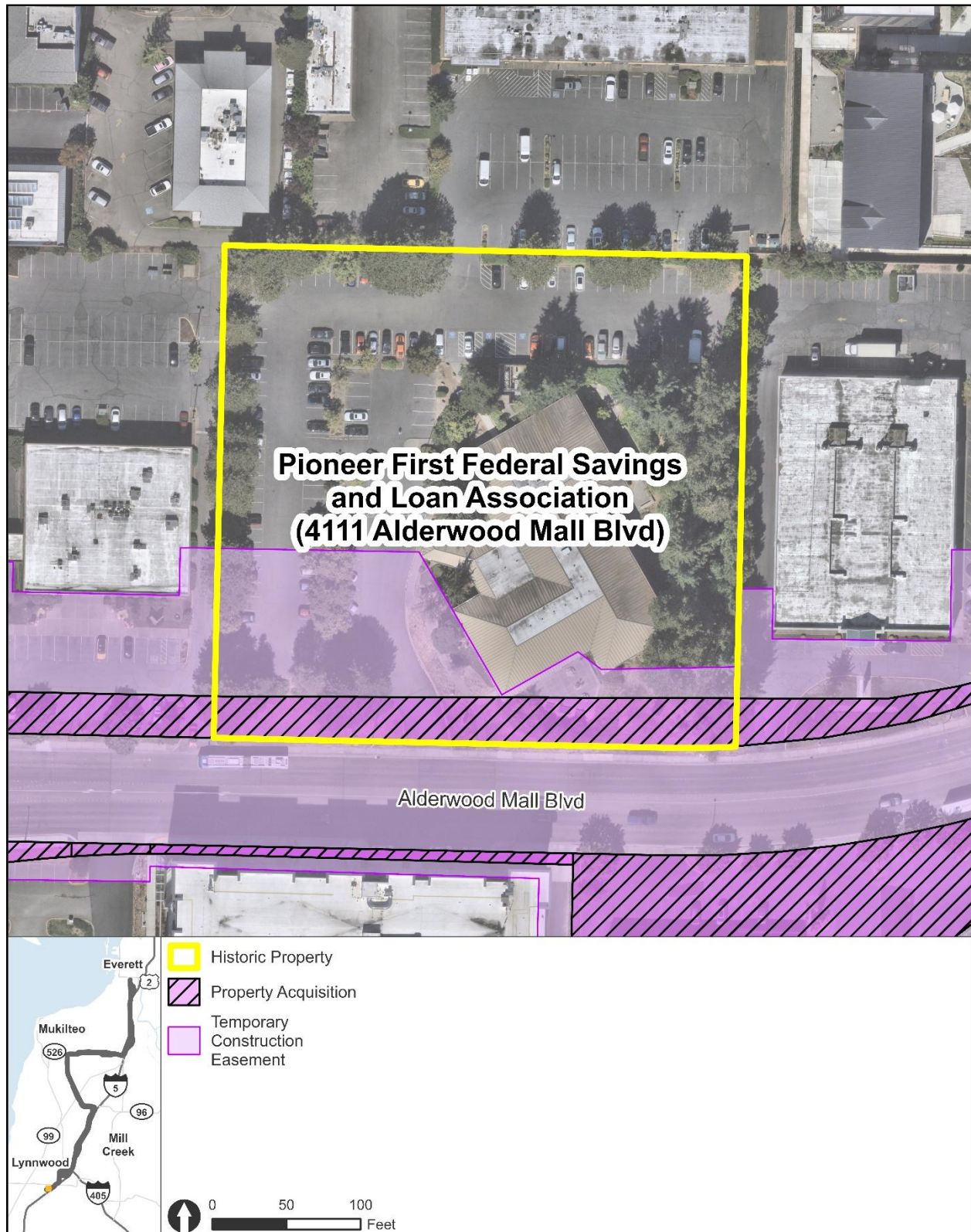
Preliminary Determination: The adverse effect under Section 106 to the Pioneer First Federal Savings and Loan Association would constitute a use under Section 4(f).

Figure H4-10 Pioneer First Federal Savings and Loan Association (4111 Alderwood Mall Blvd) – ALD-1B, ALD-1B with Alderwood Mall Boulevard Design Option, ALD-2D, ALD-2D with Alderwood Mall Boulevard Design Option, and ALD-2F



SOURCE: Snohomish County (2023).

Figure H4-11 Pioneer First Federal Savings and Loan Association (4111 Alderwood Mall Blvd) – ALD-2F with Alderwood Mall Boulevard Design Option



SOURCE: Snohomish County (2023).

Table H4-2 Preliminary Section 4(f) Use Determinations – West Alderwood Segment

Build Alternative	Interurban Trail	Ken Schoenfeld Furniture (19909 40th Avenue W)	Pacific First Federal Savings and Loan (3220 188th Street SW)	Pioneer First Federal Savings and Loan Association (4111 Alderwood Mall Blvd)
ALD-1B	No use (temporary occupancy)	No use (temporary occupancy)	No use (temporary occupancy)	Use
ALD-1B with Alderwood Mall Boulevard Design Option	No use (temporary occupancy)	No use (temporary occupancy)	No use (temporary occupancy)	Use
ALD-2D	No use (temporary occupancy)	No use (temporary occupancy)	Use	Use
ALD-2D with Alderwood Mall Boulevard Design Option	No use (temporary occupancy)	No use (temporary occupancy)	Use	Use
ALD-2F	No use (temporary occupancy)	No use (temporary occupancy)	Use	Use
ALD-2F with Alderwood Mall Boulevard Design Option	No use (temporary occupancy)	No use (temporary occupancy)	Use	Use

4.3 Ash Way Segment

Preliminary use determinations for the Section 4(f) properties in the Ash Way Segment are described below and summarized in Table H4-3.

4.3.1 Parks and Recreational Areas

4.3.1.1 Interurban Trail

See Section 4.1.1 for an evaluation of Section 4(f) use of the Interurban Trail.

4.3.2 Historic Properties

4.3.2.1 House (1204 Darben Place)

None of the Build Alternatives in the Ash Way Segment would impact this historic property; therefore, there would be no Section 4(f) use.

Table H4-3 Preliminary Section 4(f) Use Determinations – Ash Way Segment

Build Alternative	Interurban Trail	House (1204 Darben Place)
ASH-1A	No use (temporary occupancy)	No use (no permanent or temporary impacts)
ASH-2D	No use (temporary occupancy)	No use (no permanent or temporary impacts)

4.4 Mariner Segment

Preliminary use determinations for the Section 4(f) properties in the Mariner Segment are described below and summarized in Table H4-4.

4.4.1 Parks and Recreational Areas

None of the Build Alternatives in the Mariner Segment would impact any Section 4(f) parks or recreation areas; therefore, there would be no Section 4(f) use of any park or recreational areas in this segment.

4.4.2 Historic Properties

4.4.2.1 Western Six Motel (224 128th Street SW)

Alternatives MAR-1B, MAR-1B with Surface Parking Design Option, and MAR-2D

Alternatives MAR-1B, MAR-1B with Surface Parking Design Option, and MAR-2D would not require permanent acquisition of this historic property; however, a temporary construction easement would be required (see Figure H4-12 and Figure H4-13). Any areas of the property that are disturbed would be restored to existing conditions or better or replaced. FTA has preliminarily determined that the temporary construction easement would not result in an adverse effect under Section 106. This temporary occupancy is anticipated to meet the exception criteria in 23 CFR 774.13(d) (see Section 1.3) and not constitute a Section 4(f) use.

Preliminary Determination: Alternatives MAR-1B, MAR-1B with Surface Parking Design Option, and MAR-2D would not constitute a use under Section 4(f) if they satisfy the exception criteria. FTA is consulting with SHPO and anticipates concurrence that this temporary occupancy meets the criteria in 23 CFR 774.13(d). Therefore, FTA has made a preliminary determination that there will be no Section 4(f) use of this property. As part of the Final Section 4(f) Evaluation, FTA will request concurrence in writing from the SHPO.

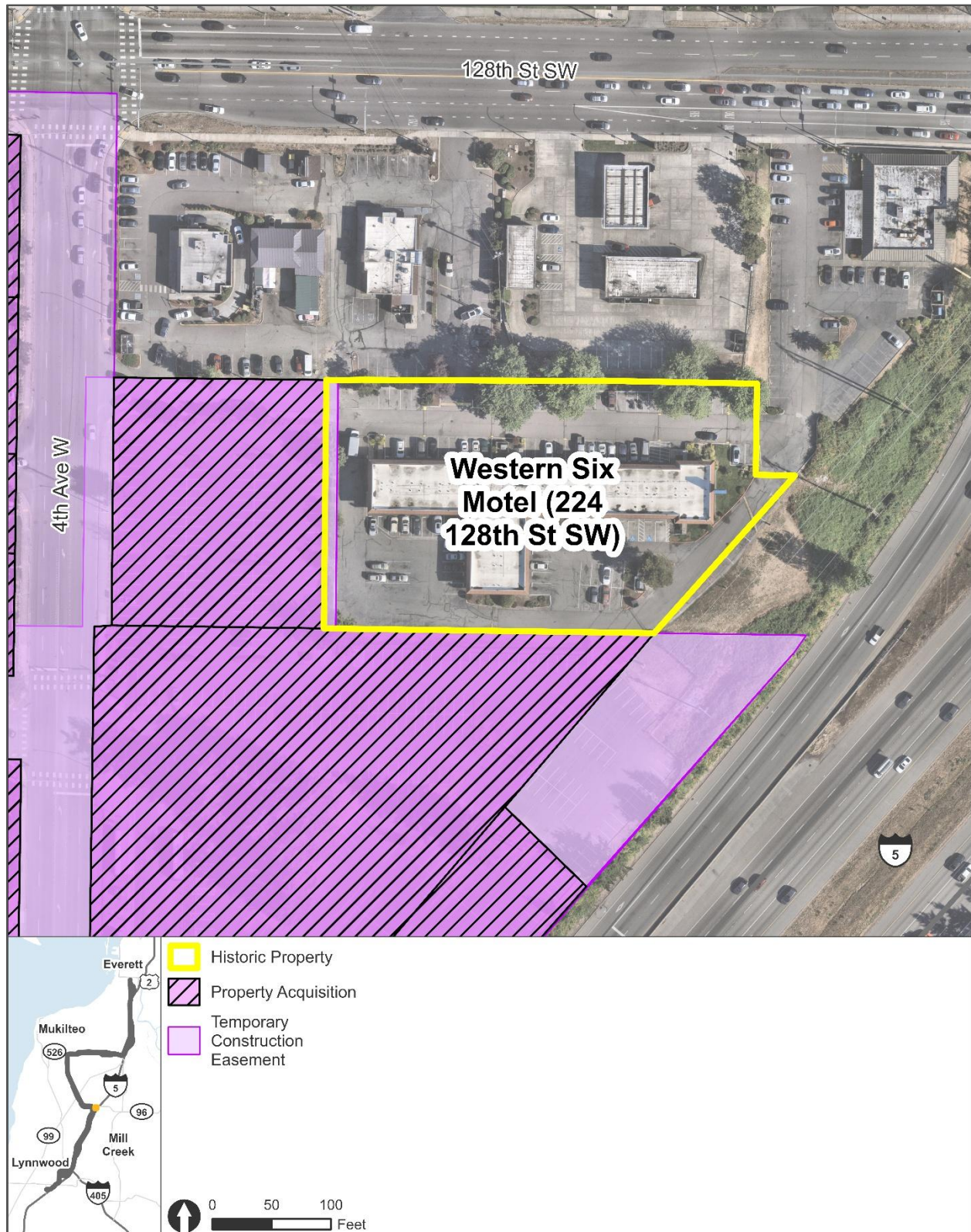
Alternative MAR-2D with Surface Parking Design Option

Alternative MAR-2D with Surface Parking Design Option would not impact this property; therefore, there would be no Section 4(f) use.

Table H4-4 Preliminary Section 4(f) Use Determinations – Mariner Segment

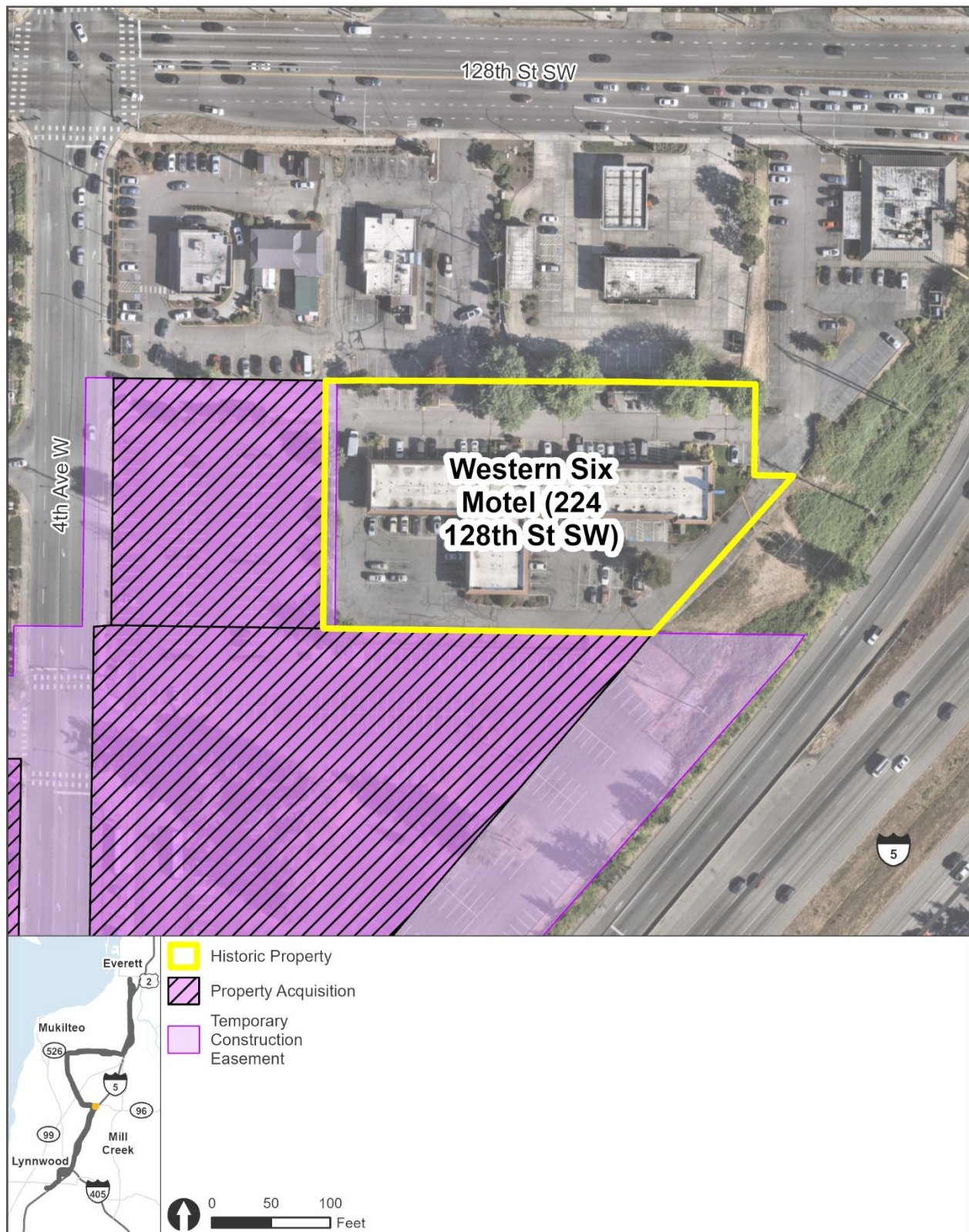
Build Alternative	Western Six Motel (224 128th St SW)
MAR-1B	No use (temporary occupancy)
MAR-1B with Surface Parking Design Option	No use (temporary occupancy)
MAR-2D	No use (temporary occupancy)
MAR-2D with Surface Parking Design Option	No use (no permanent or temporary impacts)

Figure H4-12 Western Six Motel (224 128th Street SW) – Alternatives MAR-1B and MAR-1B with Surface Parking Design Option



SOURCE: Snohomish County (2023).

Figure H4-13 Western Six Motel (224 128th Street SW) – Alternative MAR-2D



SOURCE: Snohomish County (2023).

4.5 SR 99/Airport Road Segment

Preliminary use determinations for Section 4(f) properties in the SR 99/Airport Road Segment are described below and summarized in Table H4-5.

4.5.1 Parks and Recreational Areas

None of the Build Alternatives in the SR 99/Airport Road Segment would impact any Section 4(f) parks or recreation areas; therefore, there would be no Section 4(f) use of any park or recreational areas in this segment.

4.5.2 Historic Properties

4.5.2.1 Service Station (2210 112th Street SW)

Alternative AIR-1A

Alternative AIR-1A would not impact this property; therefore, there would be no Section 4(f) use.

Alternative AIR-2B

Alternative AIR-2B would permanently incorporate land from this historic property to construct elevated guideway to the east of the property (see Figure H4-14). A temporary construction easement would also be required. FTA has preliminarily determined that the partial property acquisition would not result in an adverse effect under Section 106.

Preliminary Determination: Although land would be permanently incorporated from this historic property, Alternative AIR-2B would not result in an adverse effect under Section 106. As such, impacts to the Service Station historic property are proposed to be *de minimis* under Section 4(f). See Section 7 for a summary of proposed *de minimis* impacts.

Table H4-5 Preliminary Section 4(f) Use Determinations – SR 99/Airport Road Segment

Build Alternative	Service Station (2210 112th St SW)
AIR-1A	No use (no permanent or temporary impacts)
AIR-2B	<i>De minimis</i> impact

Figure H4-14 Service Station (2210 112th Street SW) – Alternative AIR-2B



SOURCE: Snohomish County (2023).

4.6 SW Everett Industrial Center Segment

Preliminary use determinations for Section 4(f) properties in the SW Everett Industrial Center Segment are described below and summarized in Table H4-6.

4.6.1 Parks and Recreational Areas

None of the Build Alternatives in the SW Everett Industrial Center Segment would impact any Section 4(f) parks or recreation areas; therefore, there would be no Section 4(f) use of any park or recreational areas in this segment.

4.6.2 Historic Properties

4.6.2.1 General Telephone Company Facility (2403 W Casino Road)

Alternatives SWI-1A, SWA-1A with Lower Design Option, SWI-1B, and SWI-1C

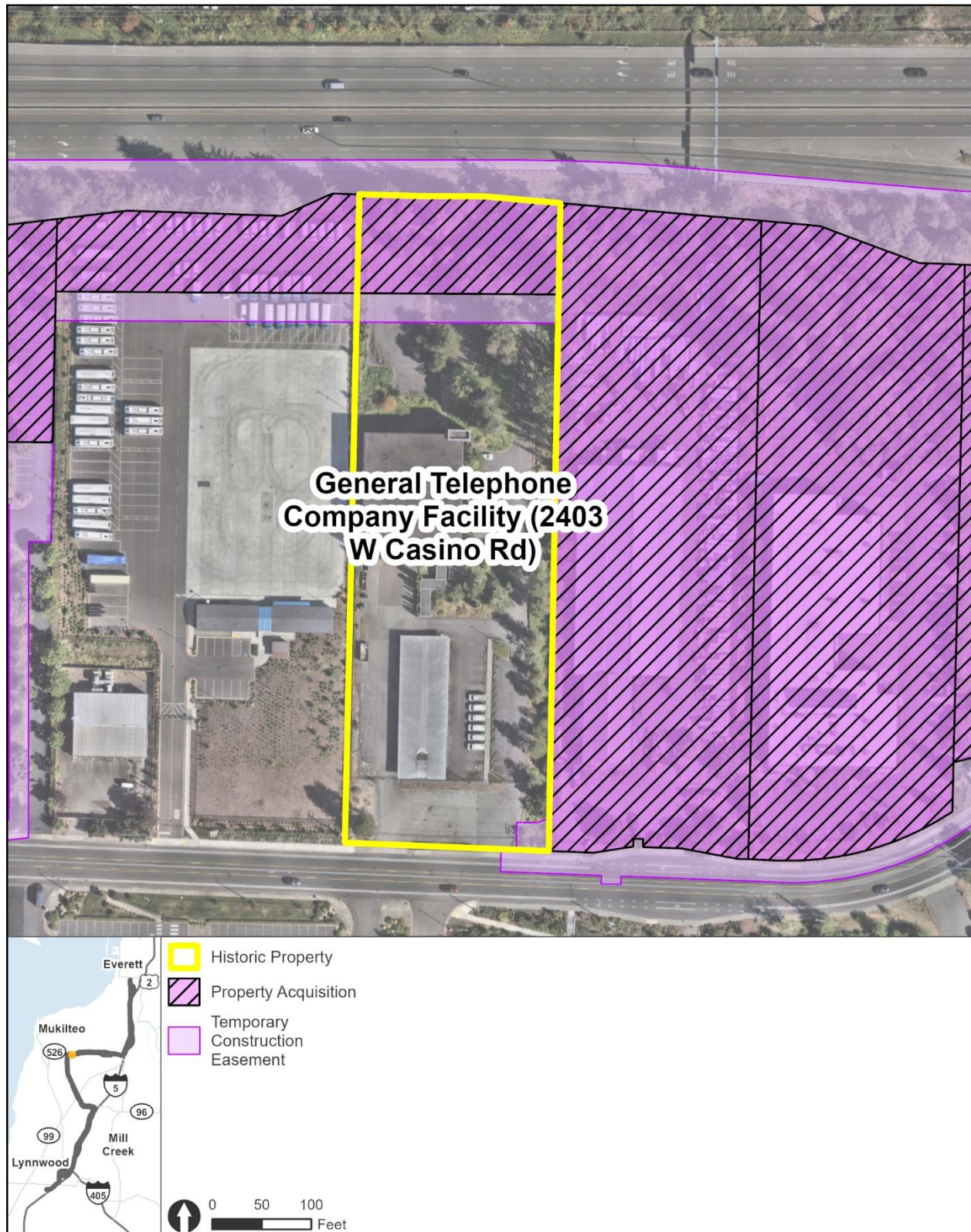
All alternatives in the SW Everett Industrial Center Segment would construct an elevated guideway along SR 526, north of the General Telephone Company Facility (see Figure H4-15, Figure H4-16, and Figure H4-17). These alternatives would permanently incorporate land from this historic property to construct the elevated guideway. A temporary construction easement would also be required. FTA has preliminarily determined that the property acquisition would not result in an adverse effect under Section 106.

Preliminary Determination: Although land would be permanently incorporated from this historic property, none of the SW Everett Industrial Center Segment alternatives would result in an adverse effect under Section 106. As such, impacts to the General Telephone Company Facility are proposed to be *de minimis* under Section 4(f). See Section 7 for a summary of proposed *de minimis* impacts.

Table H4-6 Preliminary Section 4(f) Use Determinations – SW Everett Industrial Center Segment

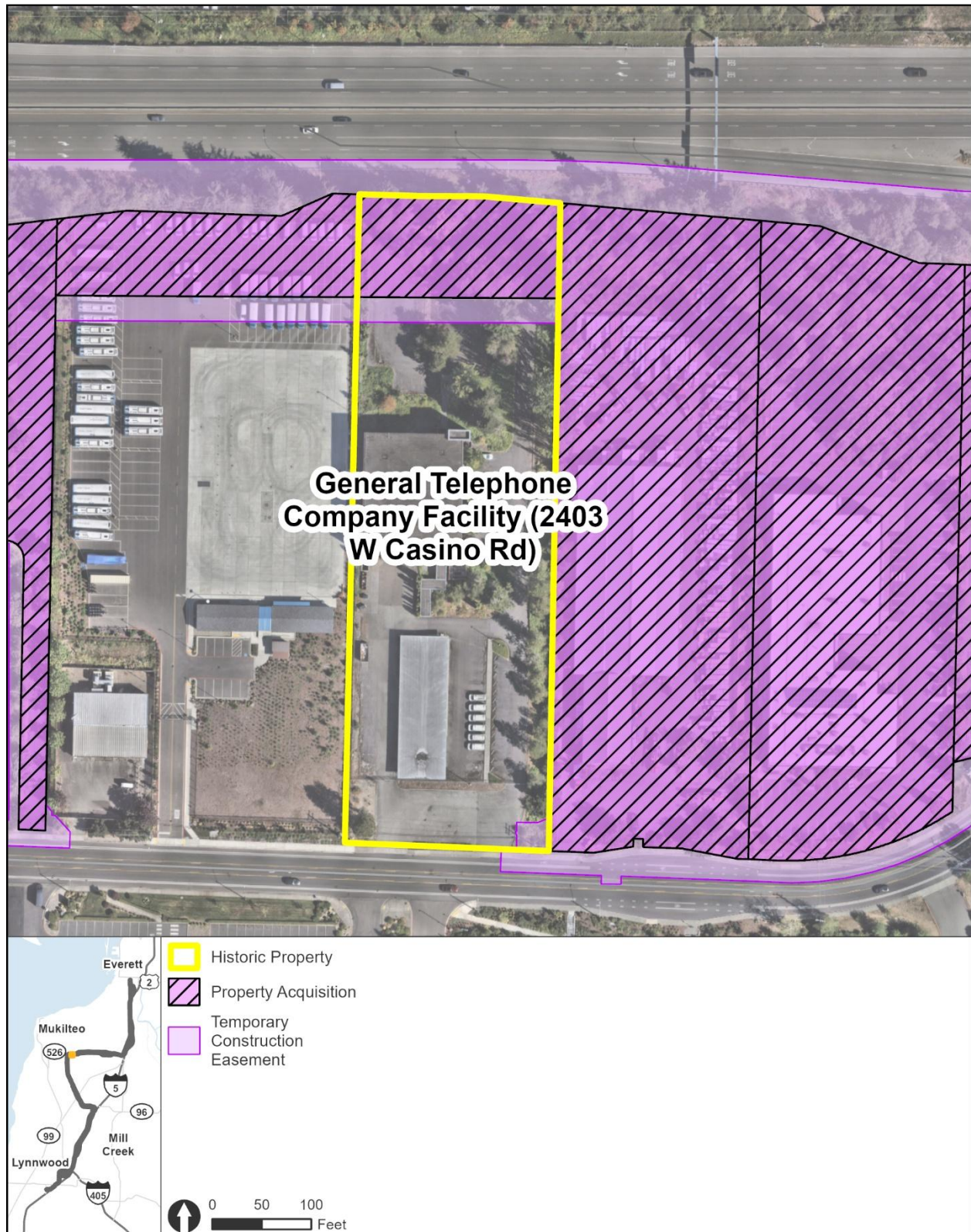
Build Alternative	General Telephone Company Facility (2403 W Casino Road)
SWI-1A	<i>De minimis</i> impact
SWI-1A with Lower Design Option	<i>De minimis</i> impact
SWI-1B	<i>De minimis</i> impact
SWI-1C	<i>De minimis</i> impact

**Figure H4-15 General Telephone Company Facility (2403 W Casino Road) –
Alternative SWI-1A**



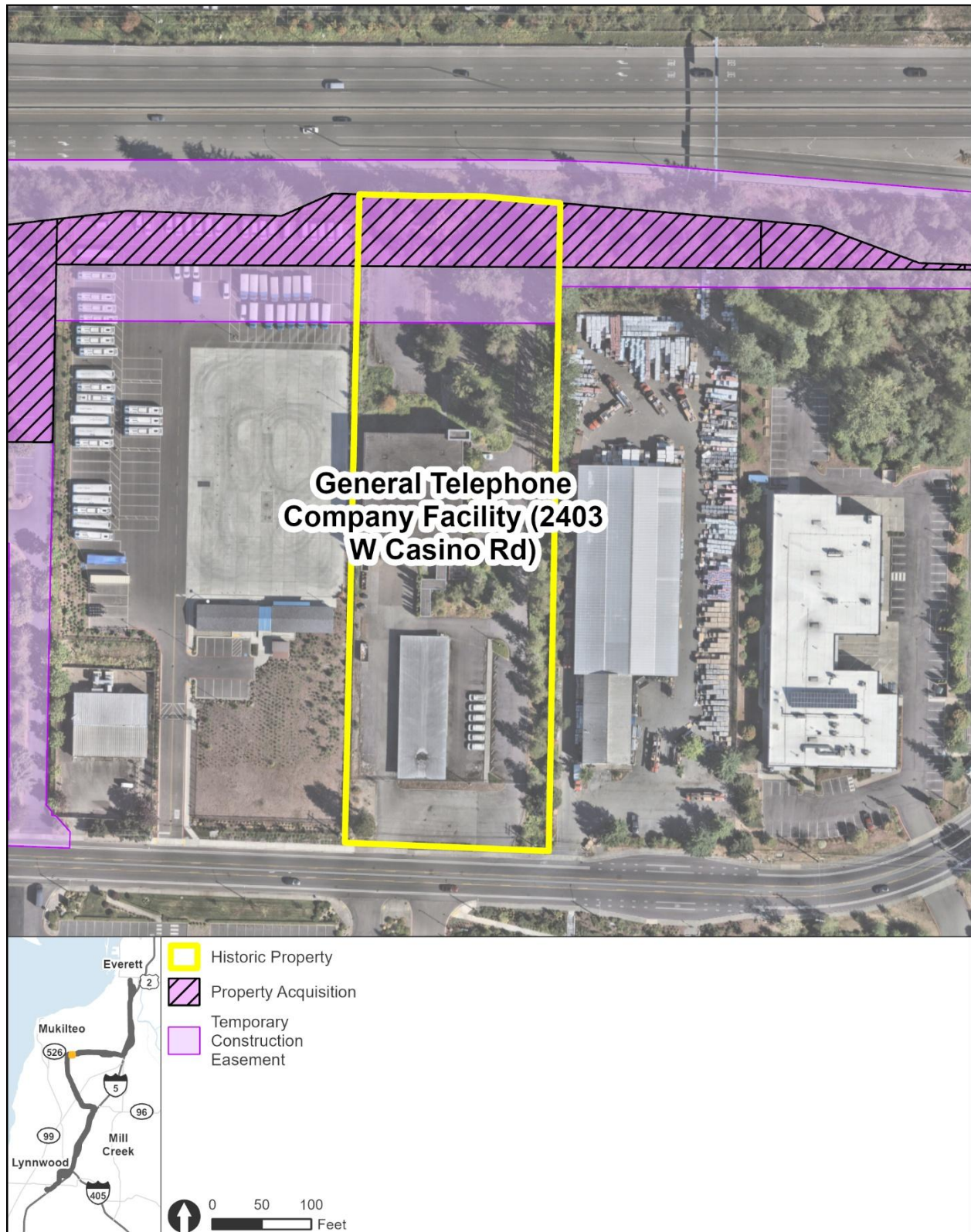
SOURCE: Snohomish County (2023).

Figure H4-16 General Telephone Company Facility (2403 W Casino Road) – Alternative SWI-1A with Lower Design Option



SOURCE: Snohomish County (2023).

Figure H4-17 General Telephone Company Facility (2403 W Casino Road) – Alternatives SWI-1B and SWI-1C



SOURCE: Snohomish County (2023).

4.7 SR 526/Evergreen Segment

Preliminary use determinations for Section 4(f) properties in the SR 526/Evergreen Segment are described below and summarized in Table H4-7.

4.7.1 Parks and Recreational Areas

4.7.1.1 Interurban Trail

See Section 4.1.1 for an evaluation of Section 4(f) use of the Interurban Trail.

4.7.1.2 Walter E. Hall Golf Course

None of the Build Alternatives in the SR 526/Evergreen Segment would impact Walter E. Hall Golf Course; therefore, there would be no Section 4(f) use.

4.7.1.3 Walter E. Hall Park

None of the Build Alternatives in the SR 526/Evergreen Segment would impact Walter E. Hall Park; therefore, there would be no Section 4(f) use.

4.7.2 Historic Properties

4.7.2.1 Bank Building (8500 Evergreen Way)

Alternative EGN-1A

Alternative EGN-1A would not impact this historic property; therefore, there would be no Section 4(f) use.

Alternatives EGN-2B, EGN-2B with North Side of SR 526 Design Option, EGN-3E, and EGN-3E with North Side of SR 526 Design Option

Alternatives EGN-2B, EGN-2B with North Side of SR 526 Design Option, EGN-3E, and EGN-3E with North Side of SR 526 Design Option would require permanent acquisition from this property (see Figure H4-18 and Figure H4-19). A temporary construction easement would also be required. FTA has preliminarily determined that the property acquisition would not result in an adverse effect under Section 106.

Preliminary Determination: Although land would be permanently incorporated from this historic property, Alternatives EGN-2B, EGN-2B with North Side of SR 526 Design Option, EGN-3E, and EGN-3E with North Side of SR 526 Design Option would not result in an adverse effect under Section 106. As such, impacts to the Bank Building historic property are proposed to be *de minimis* under Section 4(f). See Section 7 for a summary of proposed *de minimis* impacts.

Figure H4-18 Bank Building (8500 Evergreen Way) – Alternatives EGN-2B and EGN-2B with North Side of SR 526 Design Option



SOURCE: Snohomish County (2023).

Figure H4-19 Bank Building (8500 Evergreen Way) – Alternatives EGN-3E and EGN-3E with North Side of SR 526 Design Option



SOURCE: Snohomish County (2023).

4.7.2.2 General Telephone Company (426 E Casino Road)

Alternatives EGN-1A, EGN-2B, and EGN-2B with North Side of SR 526 Design Option

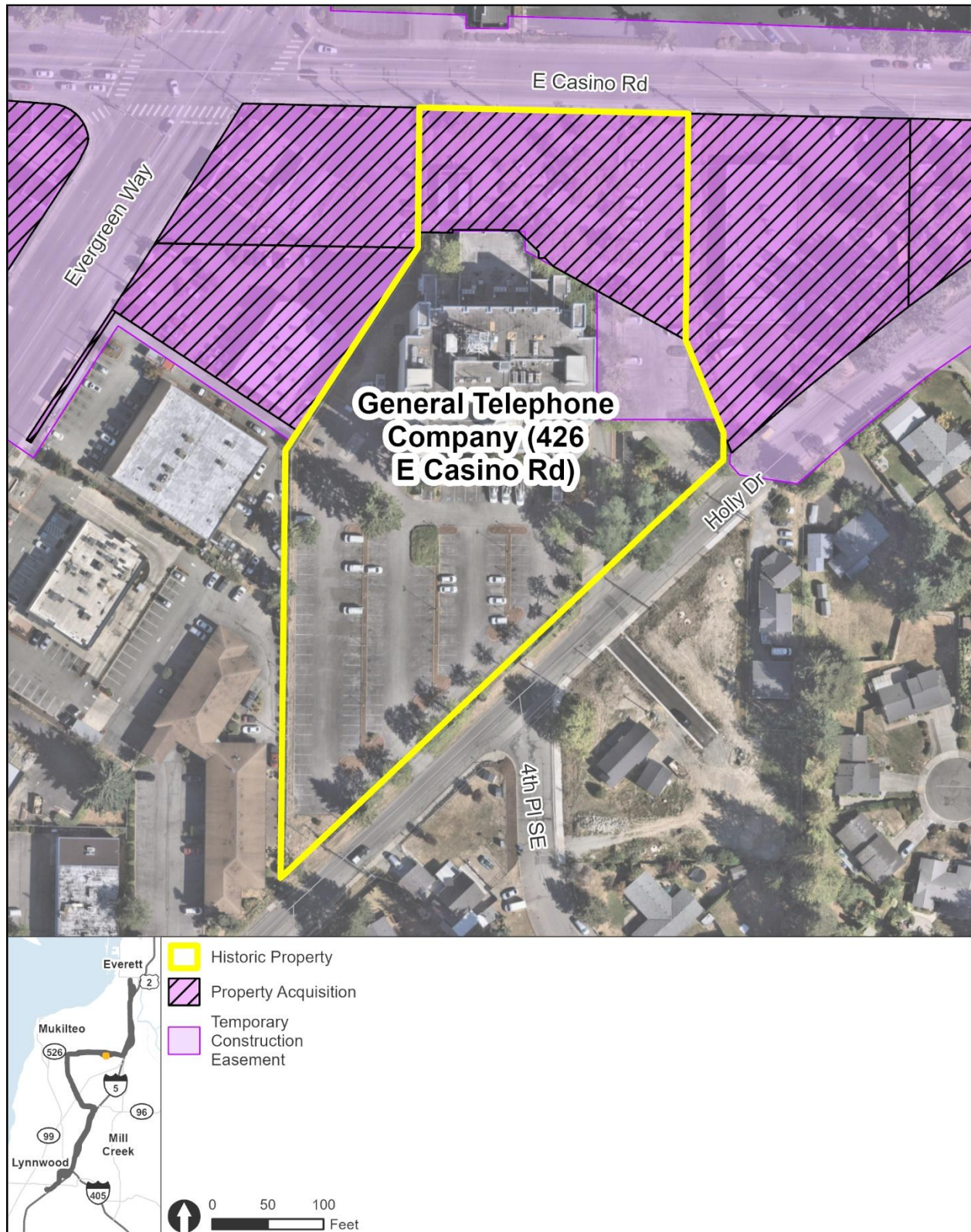
Alternatives EGN-1A, EGN-2B, and EGN-2B with North Side of SR 526 Design Option would not impact this property; therefore, there would be no Section 4(f) use.

Alternatives EGN-3E and EGN-3E with North Side of SR 526 Design Option

Alternatives EGN-3E and EGN-3E with North Side of SR 526 Design Option would permanently incorporate land from this historic property to construct elevated guideway to the south of Casino Road (see Figure H4-20). A temporary construction easement would also be required. FTA has preliminarily determined that the partial property acquisition would result in an adverse effect under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of the General Telephone Company under Section 4(f).

Figure H4-20 General Telephone Company (426 E Casino Road) – Alternatives EGN-3E and EGN-3E with North Side of SR 526 Design Option



SOURCE: Snohomish County (2023).

4.7.2.3 House (1322 Ballew Avenue)

Alternatives EGN-1A, EGN-2B, EGN-2B with North Side of SR 526 Design Option, EGN-3E, and EGN-3E with North Side of SR 526 Design Option

All alternatives in the SR 526/Evergreen Segment would permanently incorporate land from this historic property to construct elevated guideway to the south of the property (see Figure H4-21 and Figure H4-22). FTA has preliminarily determined that the property acquisition would not result in an adverse effect under Section 106.

Preliminary Determination: Although land would be permanently incorporated from this historic property, none of the SR 526/Evergreen Segment alternatives would result in an adverse effect under Section 106. As such, impacts to this historic property are proposed to be *de minimis* under Section 4(f). See Section 7 for a summary of proposed *de minimis* impacts.

Figure H4-21 House (1322 Ballew Avenue) – Alternatives EGN-1A, EGN-2B, and EGN-2B with North Side of SR 526 Design Option



SOURCE: Snohomish County (2023).

Figure H4-22 **House (1322 Ballew Avenue) – Alternatives EGN-3E and EGN-3E with North Side of SR 526 Design Option**



SOURCE: Snohomish County (2023).

4.7.2.4 House (8102 W Glen Drive)

Alternative EGN-1A

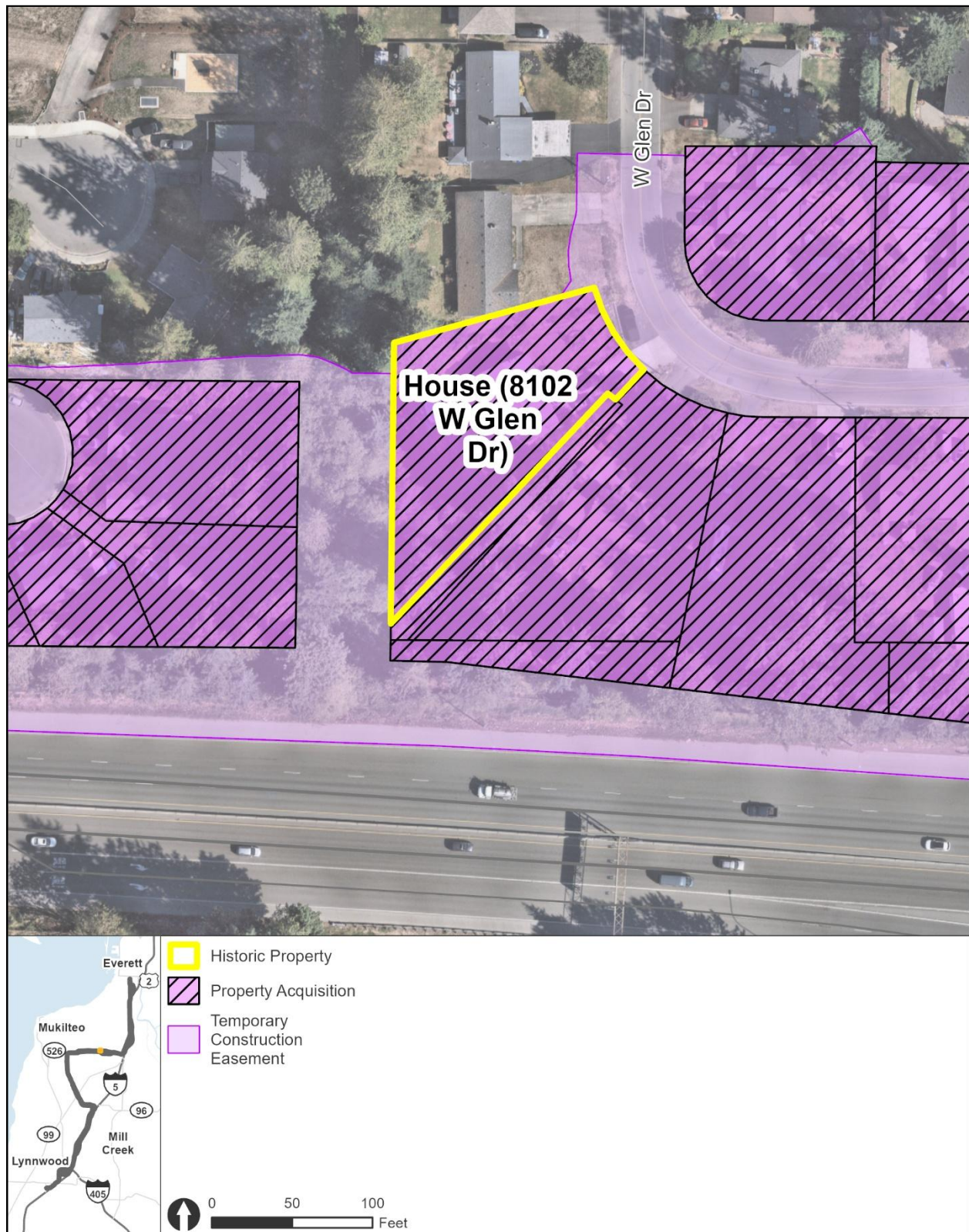
Alternative EGN-1A would construct an at-grade guideway along the north side of SR 526 and would require acquisition and demolition of this historic property (see Figure H4-23). FTA has preliminarily determined that the demolition of this building would result in an adverse effect under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

Alternatives EGN-2B, EGN-2B with North Side of SR 526 Design Option, EGN-3E, and EGN-3E with North Side of SR 526 Design Option

Alternatives EGN-2B, EGN-2B with North Side of SR 526 Design Option, EGN-3E, and EGN-3E with North Side of SR 526 Design Option would not impact this property; therefore, there would be no Section 4(f) use.

Figure H4-23 House (8102 W Glen Drive) – Alternative EGN-1A



SOURCE: Snohomish County (2023).

Table H4-7 Preliminary Section 4(f) Use Determinations – SR 526/Evergreen Segment

Build Alternative	Interurban Trail	Bank Building (8500 Evergreen Way)	General Telephone Company (426 E Casino Road)	House (1322 Ballew Avenue)	House (8102 W Glen Drive)
EGN-1A	No use (temporary occupancy)	No use (no permanent or temporary impacts)	No use (no permanent or temporary impacts)	<i>De minimis</i> impact	Use
EGN-2B	No use (temporary occupancy)	<i>De minimis</i> impact	No use (no permanent or temporary impacts)	<i>De minimis</i> impact	No use (no permanent or temporary impacts)
EGN-2B with North Side of SR 526 Design Option	No use (temporary occupancy)	<i>De minimis</i> impact	No use (no permanent or temporary impacts)	<i>De minimis</i> impact	No use (no permanent or temporary impacts)
EGN-3E	No use (temporary occupancy)	<i>De minimis</i> impact	Use	<i>De minimis</i> impact	No use (no permanent or temporary impacts)
EGN-3E with North Side of SR 526 Design Option	No use (temporary occupancy)	<i>De minimis</i> impact	Use	<i>De minimis</i> impact	No use (no permanent or temporary impacts)

4.8 Broadway/I-5 Segment

Preliminary use determinations for Section 4(f) properties in the Broadway/I-5 Segment are described below and summarized in Table H4-8.

4.8.1 Park and Recreational Areas

None of the Build Alternatives in the Broadway/I-5 Segment would impact any Section 4(f) parks or recreation areas; therefore, there would be no Section 4(f) use of any park or recreational areas in this segment.

4.8.2 Historic Properties

4.8.2.1 House (5529 Commercial Avenue)

Alternative BI-1

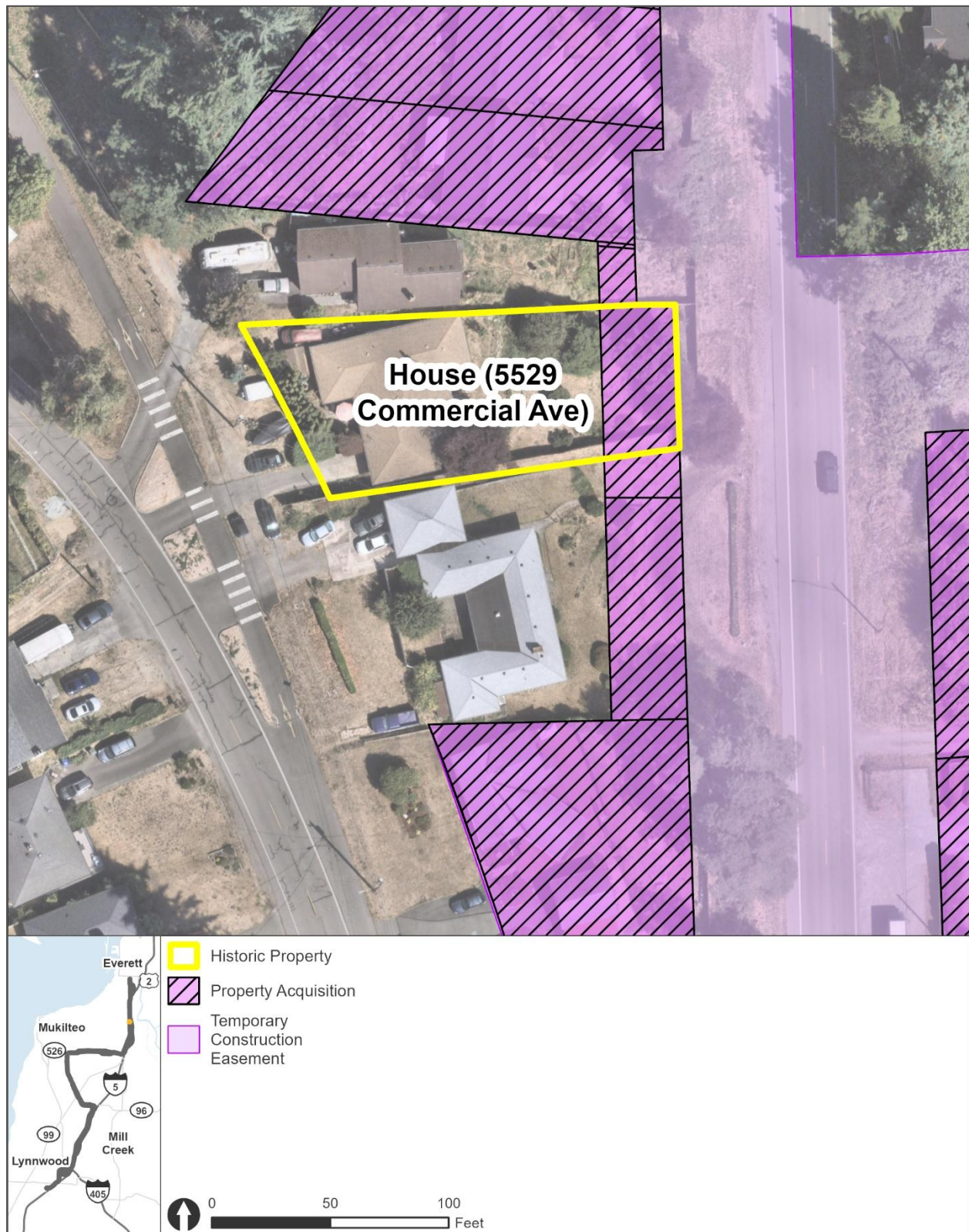
Alternative BI-1 would not impact this property; therefore, there would be no Section 4(f) use.

Alternative BI-2

Alternative BI-2 would require permanent acquisition from this property; however, demolition of the historic property would not be required (Figure H4-24). Still, FTA has preliminarily determined that the partial property acquisition and proximity effects would result in an adverse effect under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

Figure H4-24 House (5529 Commercial Avenue) – Alternative BI-2



SOURCE: Snohomish County (2023).

4.8.2.2 House (2118 Jefferson Place)

Alternative BI-1

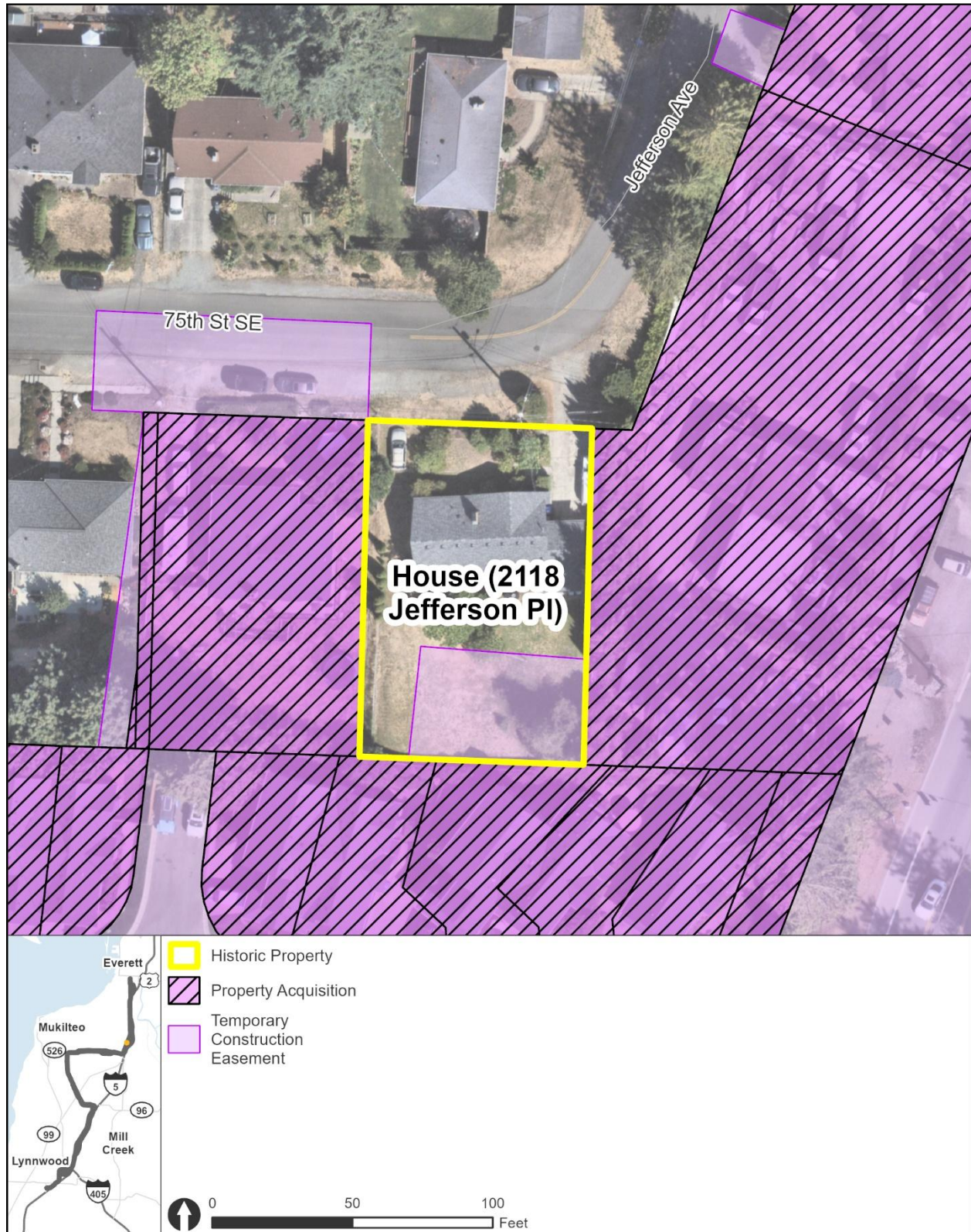
Alternative BI-1 would not impact this property; therefore, there would be no Section 4(f) use.

Alternative BI-2

Alternative BI-2 would construct an at-grade guideway to the west of Broadway. A temporary construction easement would be required on this historic property (see Figure H4-25). The properties adjacent to the east, west, and south of this property would each be permanently incorporated into the EVLE project and demolished. FTA has preliminarily determined that the proximity impacts on this property would result in an adverse effect under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

Figure H4-25 House (2118 Jefferson Place) – Alternative BI-2



SOURCE: Snohomish County (2023).

4.8.2.3 House (7404 McDougall Avenue)

Alternatives BI-1 and BI-2

Alternatives BI-1 and BI-2 would not impact this property; therefore, there would be no Section 4(f) use.

4.8.2.4 House (8105 Spokane Drive)

Alternative BI-1

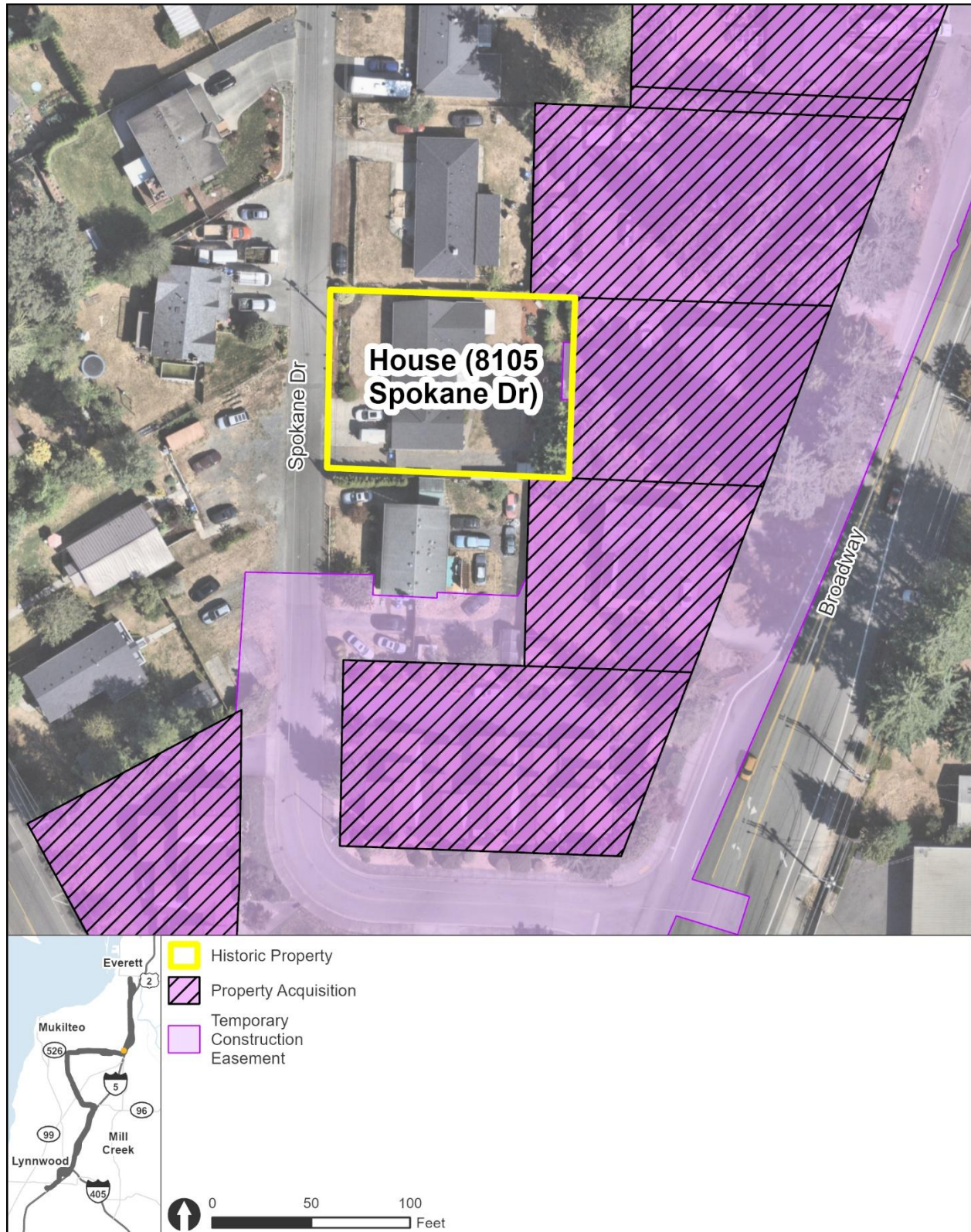
Alternative BI-1 would not impact this property; therefore, there would be no Section 4(f) use.

Alternative BI-2

Alternative BI-2 would construct an at-grade guideway to the west of Broadway. A temporary construction easement would be required on this historic property (see Figure H4-26). Any areas of the property that are disturbed would be restored to existing conditions or better or replaced. FTA has preliminarily determined that the temporary construction easement would not result in an adverse effect under Section 106. This temporary occupancy is anticipated to meet the exception criteria in 23 CFR 774.13(d) (see Section 1.3) and not constitute a Section 4(f) use.

Preliminary Determination: Alternative BI-2 would not constitute a use under Section 4(f) if the exception criteria are satisfied. FTA is consulting with SHPO and anticipates concurrence that this temporary occupancy meets the criteria in 23 CFR 774.13(d). Therefore, FTA has made a preliminary determination that there will be no Section 4(f) use of this property. As part of the Final Section 4(f) Evaluation, FTA will request concurrence in writing from the SHPO.

Figure H4-26 House (8105 Spokane Drive) – Alternative BI-2



SOURCE: Snohomish County (2023).

4.8.2.5 House (5531 S 3rd Avenue)

Alternative BI-1

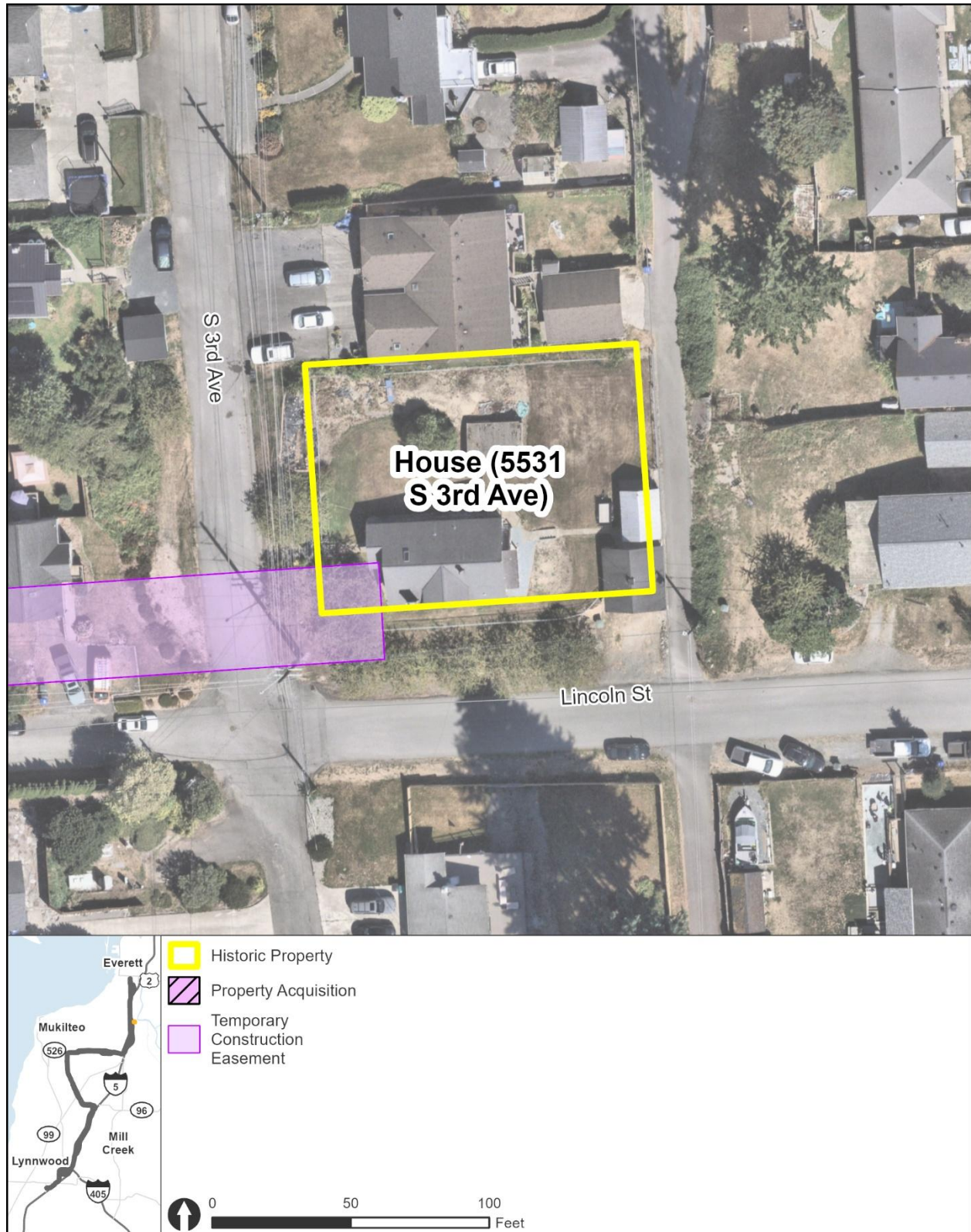
Alternative BI-1 would require a temporary construction easement on this historic property (see Figure H4-27). Any areas of the property that are disturbed would be restored to existing conditions or better or replaced. FTA has preliminarily determined that the temporary construction easement would not result in an adverse effect under Section 106. This temporary occupancy is anticipated to meet the exception criteria in 23 CFR 774.13(d) (see Section 1.3) and not constitute a Section 4(f) use.

Preliminary Determination: Alternative BI-1 would not constitute a use under Section 4(f) if the exception criteria are satisfied. FTA is consulting with SHPO and anticipates concurrence that this temporary occupancy meets the criteria in 23 CFR 774.13(d). Therefore, FTA has made a preliminary determination that there will be no Section 4(f) use of this property. As part of the Final Section 4(f) Evaluation, FTA will request concurrence in writing from the SHPO.

Alternative BI-2

Alternative BI-2 would not impact this property; therefore, there would be no Section 4(f) use.

Figure H4-27 House (5531 S 3rd Avenue) – Alternative BI-1



SOURCE: Snohomish County (2023).

4.8.2.6 Lexington Arms Apartments (2508 Lexington Avenue)

Alternative BI-1

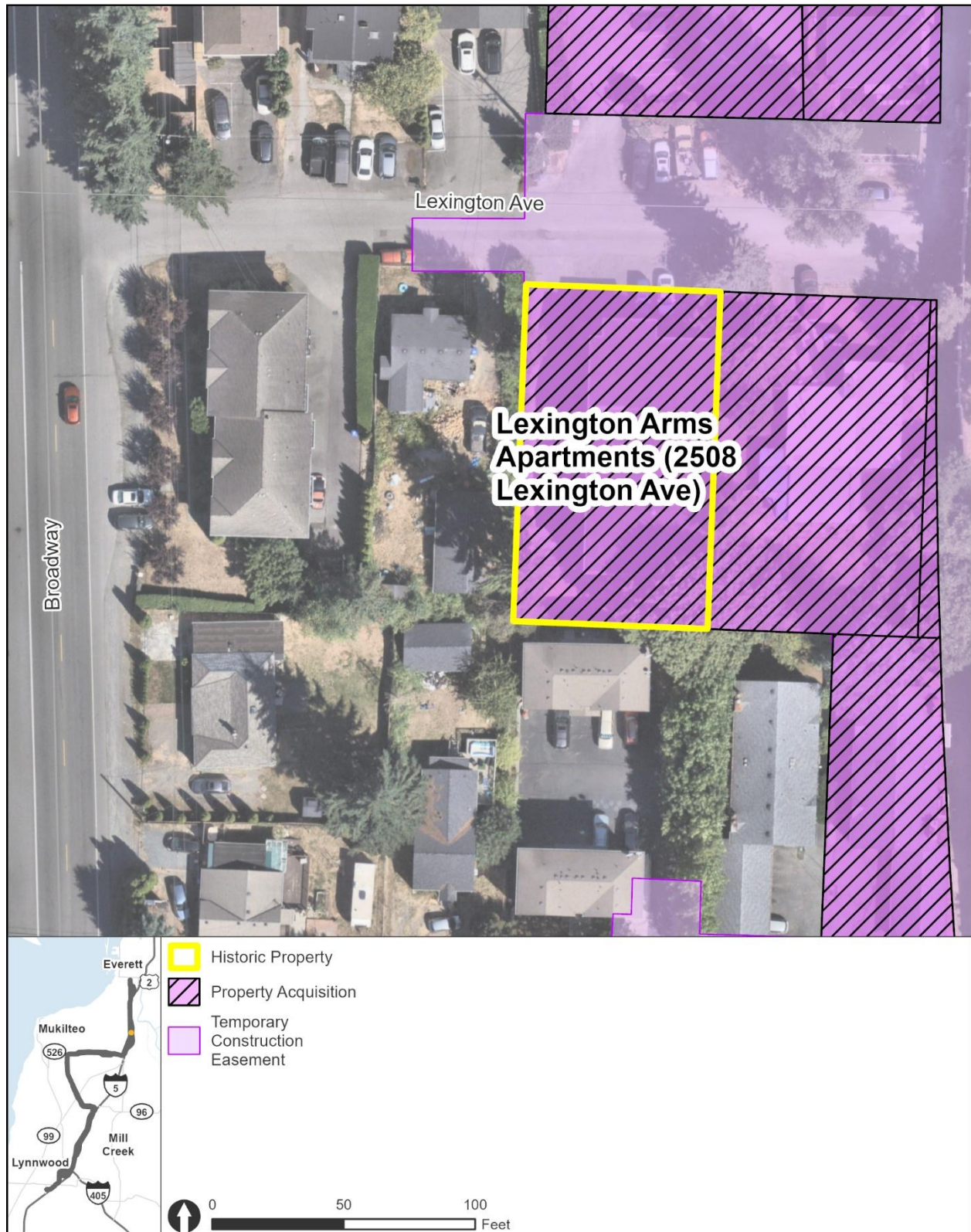
Alternative BI-1 would construct an at-grade guideway west of I-5, which would require demolition of the Lexington Arms Apartments building (see Figure H4-28). FTA has preliminarily determined that the demolition of this building would result in an adverse effect under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of the Lexington Arms Apartments historic property under Section 4(f).

Alternative BI-2

Alternative BI-2 would not impact this property; therefore, there would be no Section 4(f) use.

Figure H4-28 **Lexington Arms Apartments (2508 Lexington Avenue) – Alternative BI-1**



SOURCE: Snohomish County (2023).

Table H4-8 Preliminary Section 4(f) Use Determinations – Broadway/I-5 Segment

Build Alternative	Interurban Trail	House (5529 Commercial Avenue)	House (2118 Jefferson Place)	House (7404 McDougall Avenue)	House (8105 Spokane Drive)	House (5531 S 3rd Avenue)	Lexington Arms Apartments (2508 Lexington Avenue)
BI-1	No use (no permanent or temporary impacts)	No use (no permanent or temporary impacts)	No use (no permanent or temporary impacts)	No use (no permanent or temporary impacts)	No use (no permanent or temporary impacts)	No use (temporary occupancy)	Use
BI-2	No use (no permanent or temporary impacts)	Use	Use	No use (no permanent or temporary impacts)	No use (temporary occupancy)	No use (no permanent or temporary impacts)	No use (no permanent or temporary impacts)

4.9 Everett Station Segment

Preliminary use determinations for Section 4(f) properties in the Everett Station Segment are described below and summarized in Table H4-9.

4.9.1 Parks and Recreational Areas

None of the Build Alternatives in the Everett Station Segment would impact any Section 4(f) parks or recreation areas; therefore, there would be no Section 4(f) use of any park or recreational areas in this segment.

4.9.2 Historic Properties

4.9.2.1 Callahan Plumbing and Heating, Building 1 (3211 Broadway)

Alternative EVT-1A

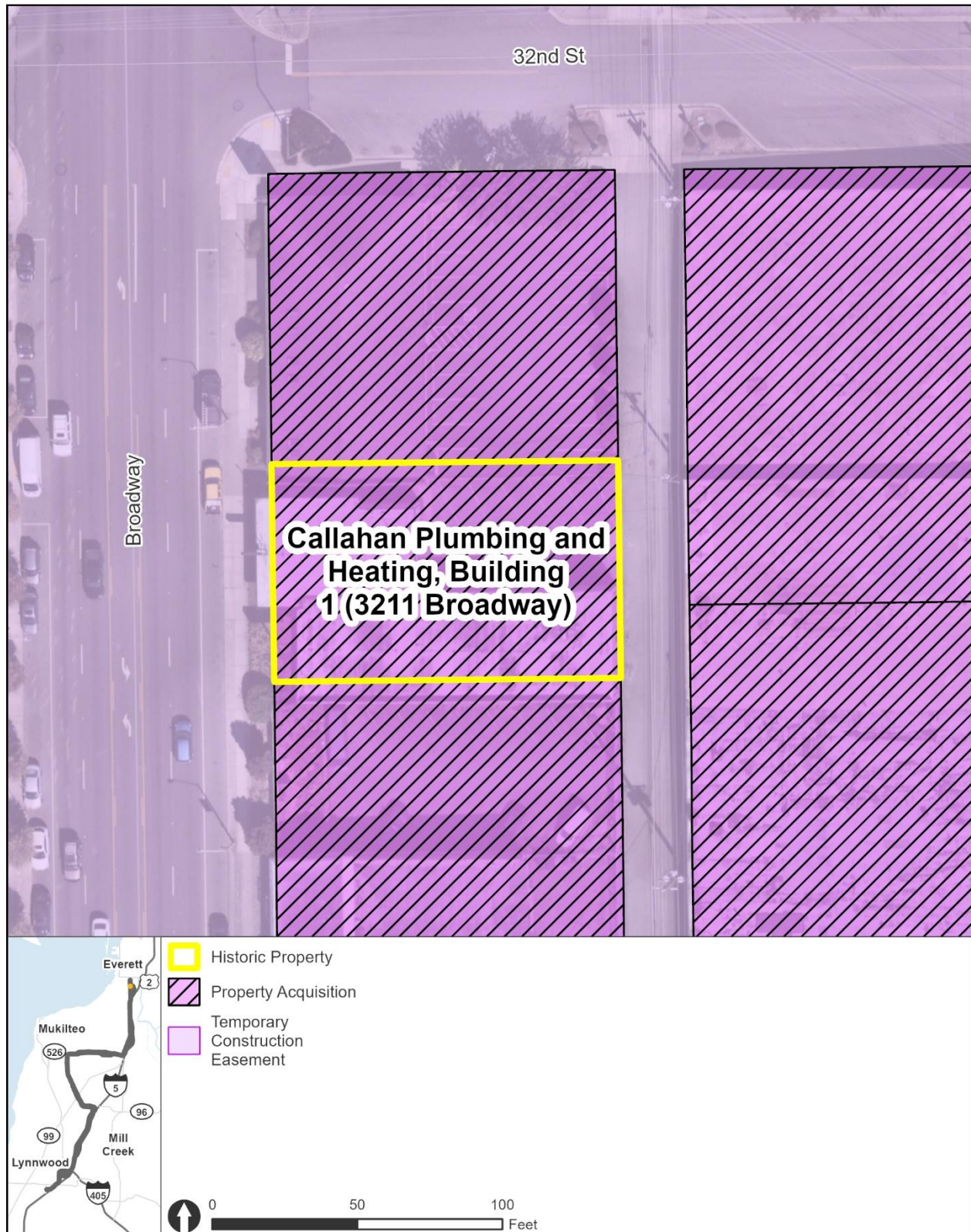
Alternative EVT-1A would not impact this property; therefore, there would be no Section 4(f) use.

Alternative EVT-2C and EVT-3D

Alternatives EVT-2C and EVT-3D would each construct an elevated guideway between Broadway and McDougall Avenue. Both alternatives would require demolition of Callahan Plumbing and Heating, Building 1 (see Figure H4-29 and Figure H4-30). FTA has preliminarily determined that the demolition of this building would result in an adverse effect under Section 106.

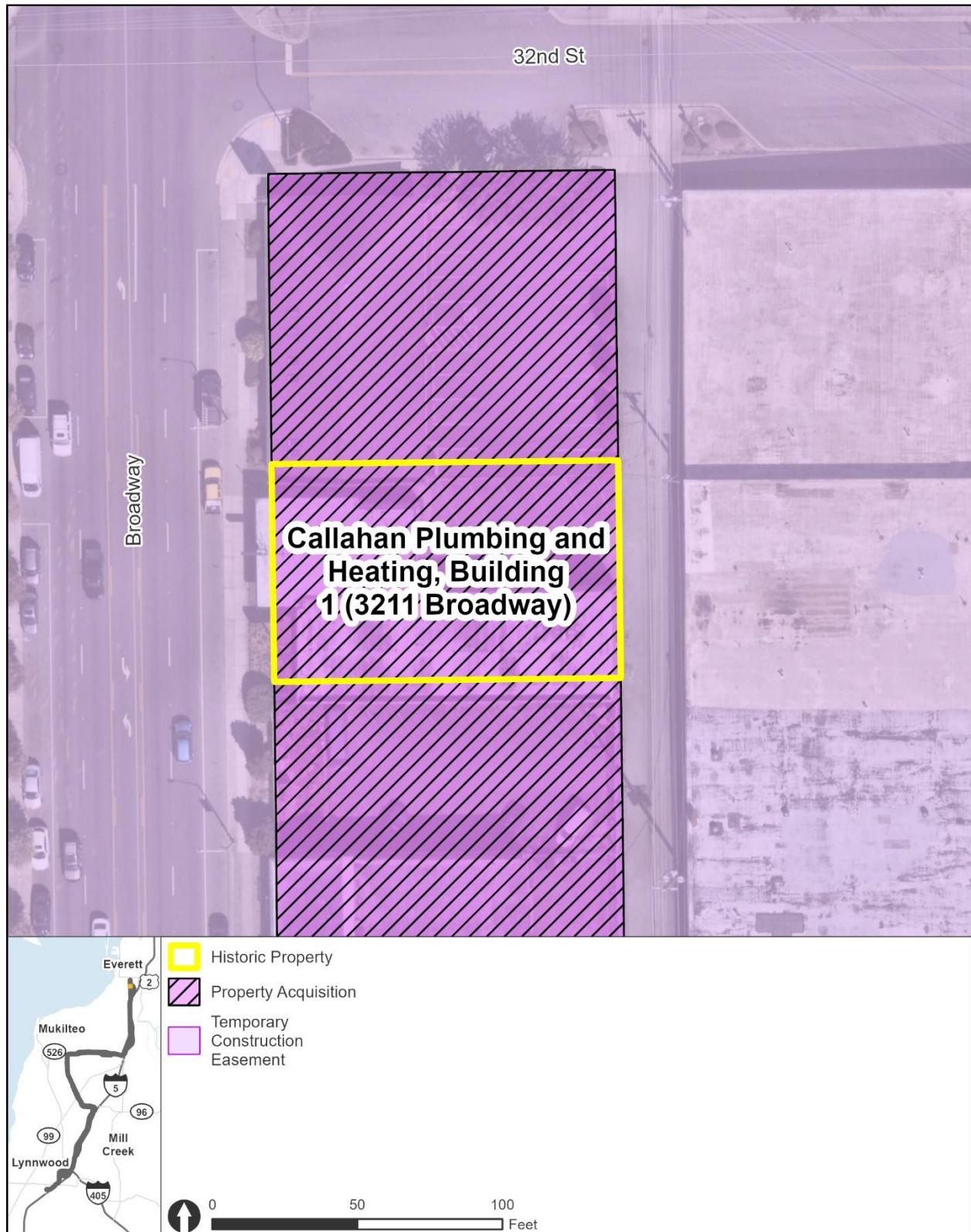
Preliminary Determination: The adverse effect under Section 106 would constitute a use of the Callahan Plumbing and Heating, Building 1 historic property under Section 4(f).

Figure H4-29 Callahan Plumbing and Heating, Building 1 (3221 Broadway) – Alternative EVT-2C



SOURCE: Snohomish County (2023).

Figure H4-30 Callahan Plumbing and Heating, Building 1 (3211 Broadway) – Alternative EVT-3D



SOURCE: Snohomish County (2023).

4.9.2.2 Everett Bottling Works (3231 Broadway)

Alternative EVT-1A

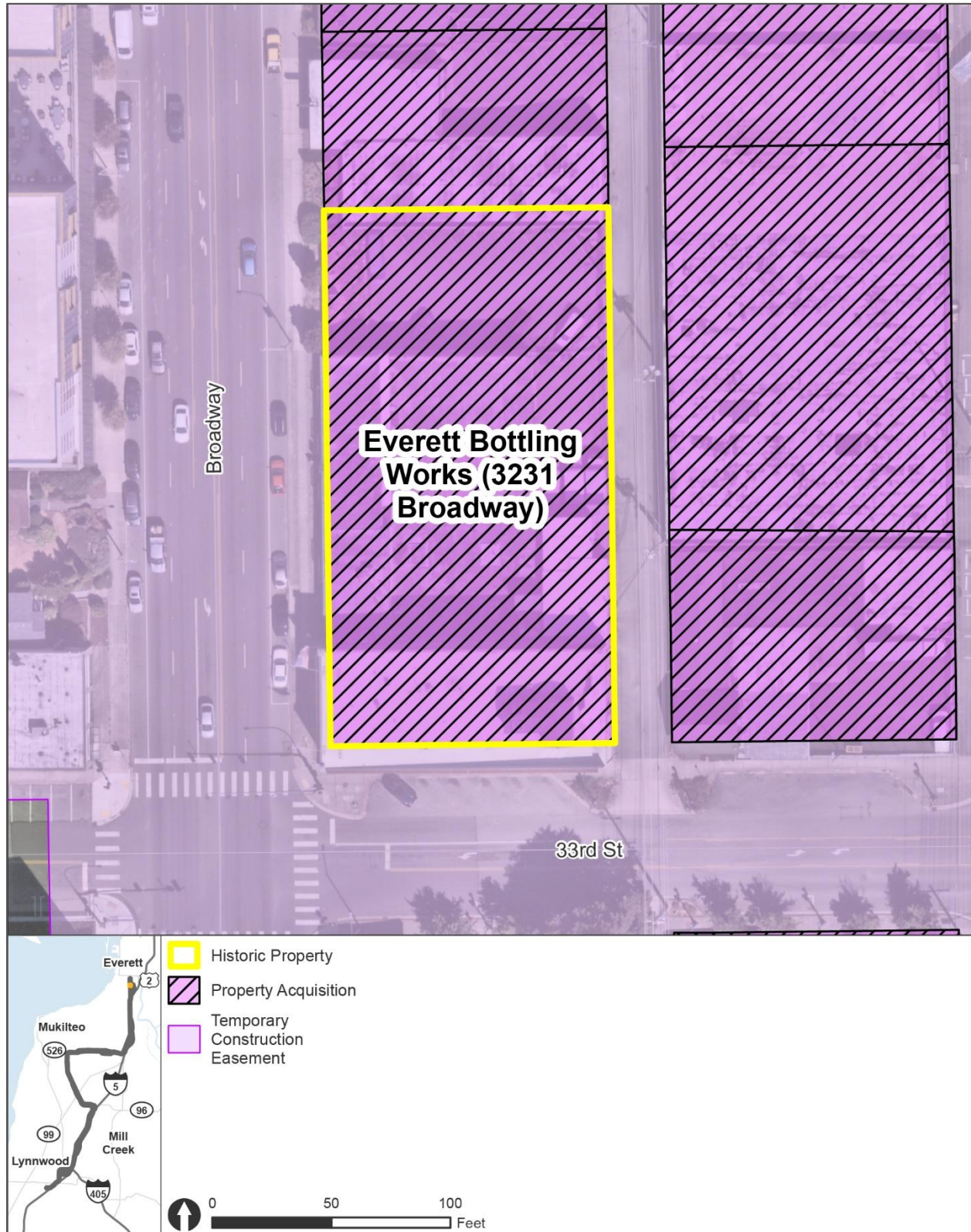
Alternative EVT-1A would not impact this property; therefore, there would be no Section 4(f) use.

Alternatives EVT-2C, and EVT-3D

Alternatives EVT-2C and EVT-3D would each construct an elevated guideway which would require permanent acquisition and demolition of the Everett Bottling Works (see Figure H4-31 and Figure H4-32). FTA has preliminarily determined that the demolition of this building would result in an adverse effect under Section 106.

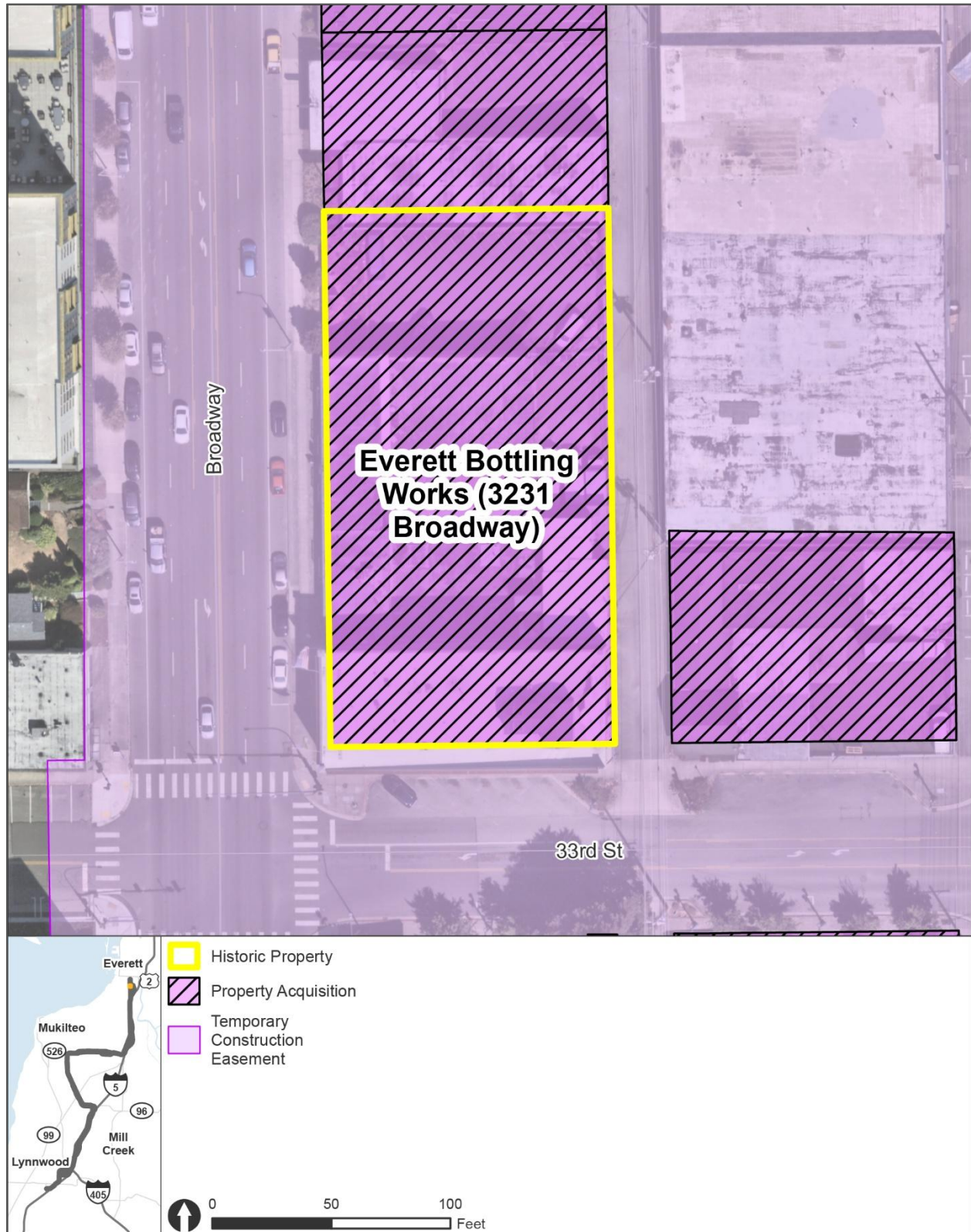
Preliminary Determination: The adverse effect under Section 106 would constitute a use of the Everett Bottling Works under Section 4(f).

Figure H4-31 **Everett Bottling Works (3231 Broadway) – Alternative EVT-2C**



SOURCE: Snohomish County (2023).

Figure H4-32 **Everett Bottling Works (3231 Broadway) – Alternative EVT-3D**



SOURCE: Snohomish County (2023).

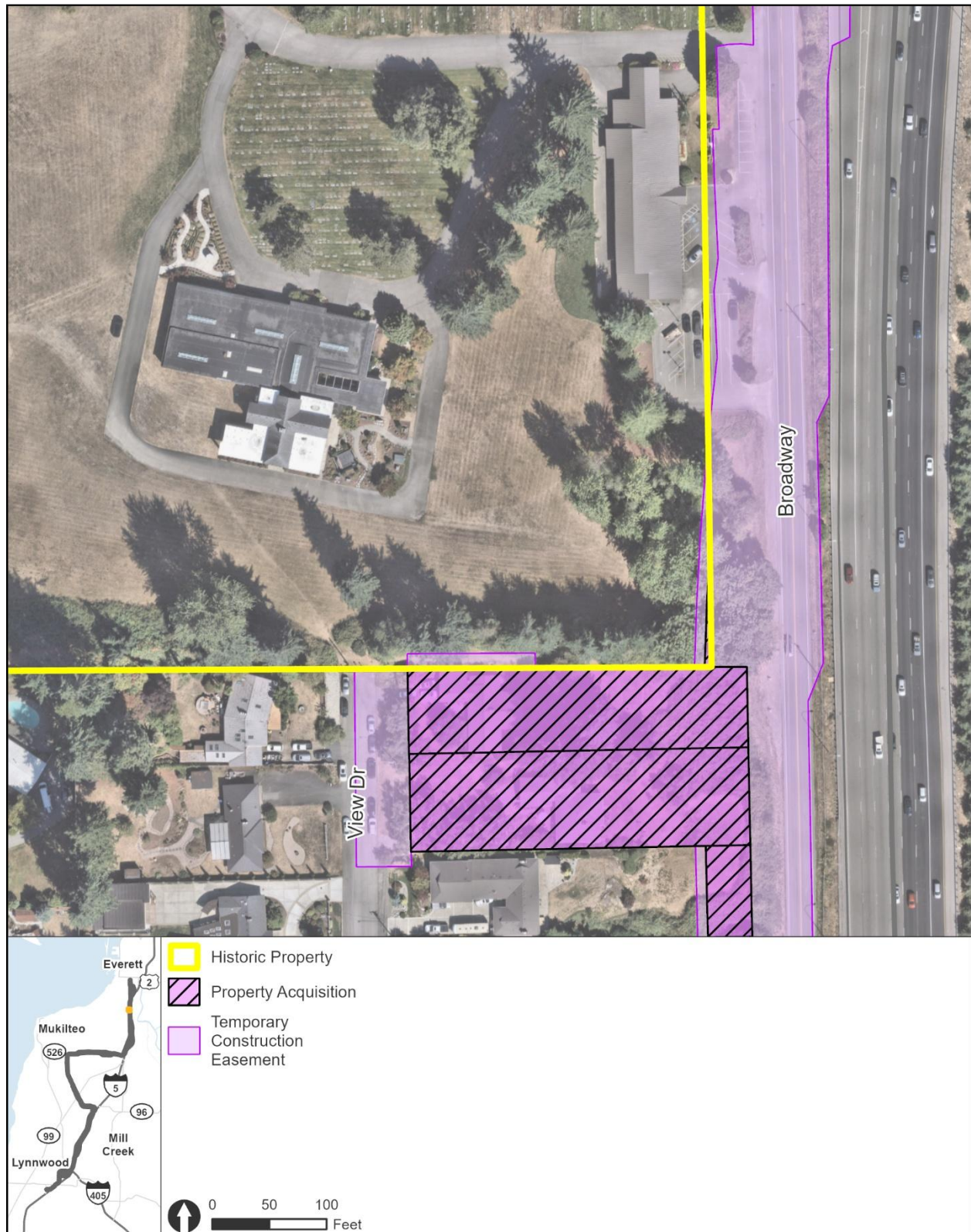
4.9.2.3 Evergreen Cemetery (4504 Broadway)

Alternatives EVT-1A, EVT-2C, and EVT-3D

All alternatives in this segment would construct an elevated guideway along Broadway and require a small permanent acquisition from the Evergreen Cemetery (see Figure H4-33). A temporary construction easement would also be required. FTA has preliminarily determined that the property acquisition would not result in an adverse effect under Section 106.

Preliminary Determination: Although land would be permanently incorporated from this historic property, none of the Everett Station Segment alternatives would result in an adverse effect under Section 106. As such, impacts to the Evergreen Cemetery historic property are proposed to be *de minimis* under Section 4(f). See Section 7 for a summary of proposed *de minimis* impacts.

Figure H4-33 Evergreen Cemetery (4504 Broadway) – All Everett Station Segment Alternatives



SOURCE: Snohomish County (2023).

4.9.2.4 House (3224 Broadway)

Alternative EVT-1A

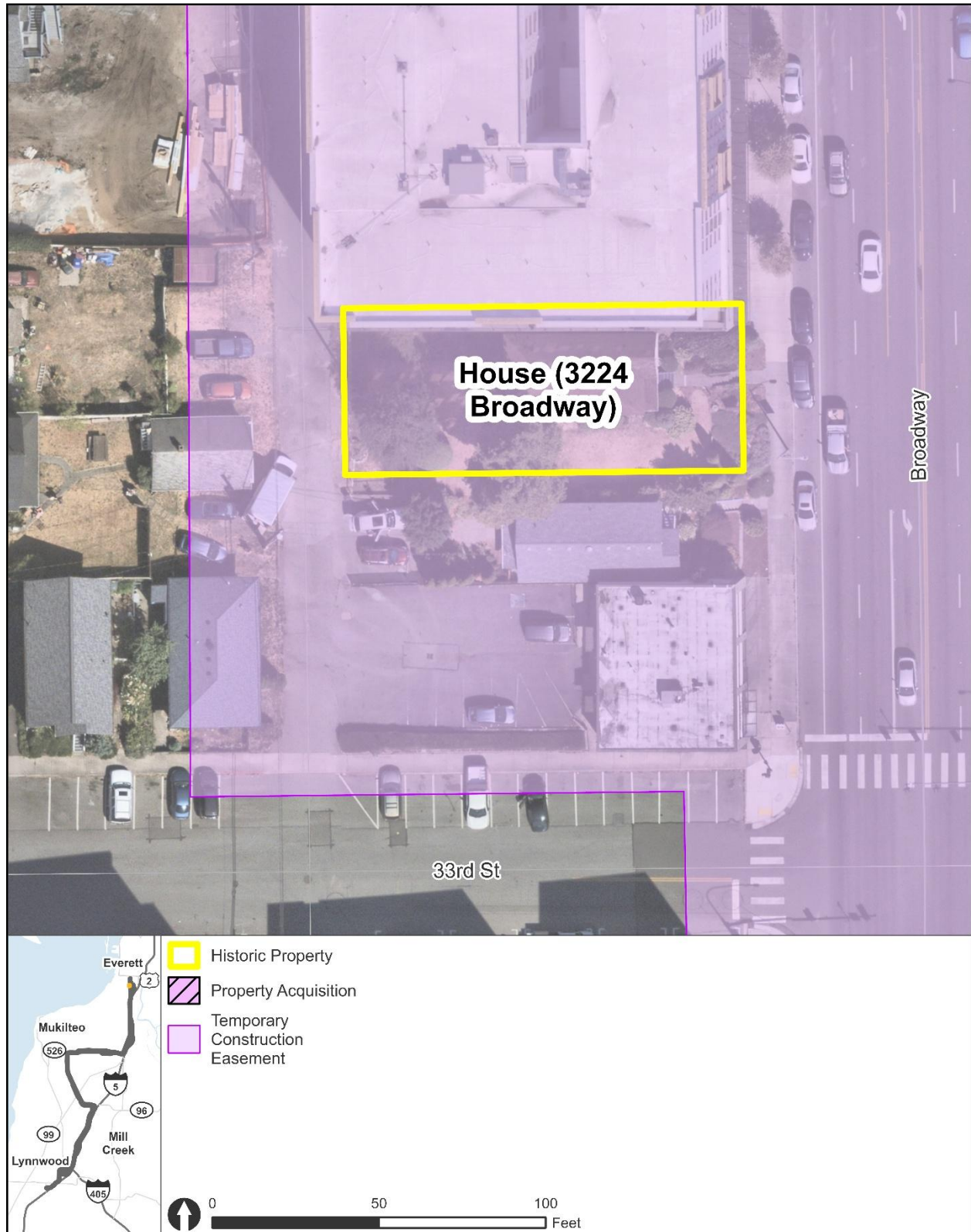
Alternative EVT-1A would not impact this property; therefore, there would be no Section 4(f) use.

Alternatives EVT-2C and EVT-3D

Alternatives EVT-2C and EVT-3D would each construct elevated guideway to the east of the property (see Figure H4-34 and Figure H4-35). These alternatives would not require a permanent acquisition of the property; however, a temporary construction easement would be required. Any areas of the property that are disturbed would be restored to existing conditions or better or replaced. FTA has preliminarily determined that the temporary construction easement would not result in an adverse effect under Section 106. This temporary occupancy is anticipated to meet the exception criteria in 23 CFR 774.13(d) (see Section 1.3) and not constitute a Section 4(f) use.

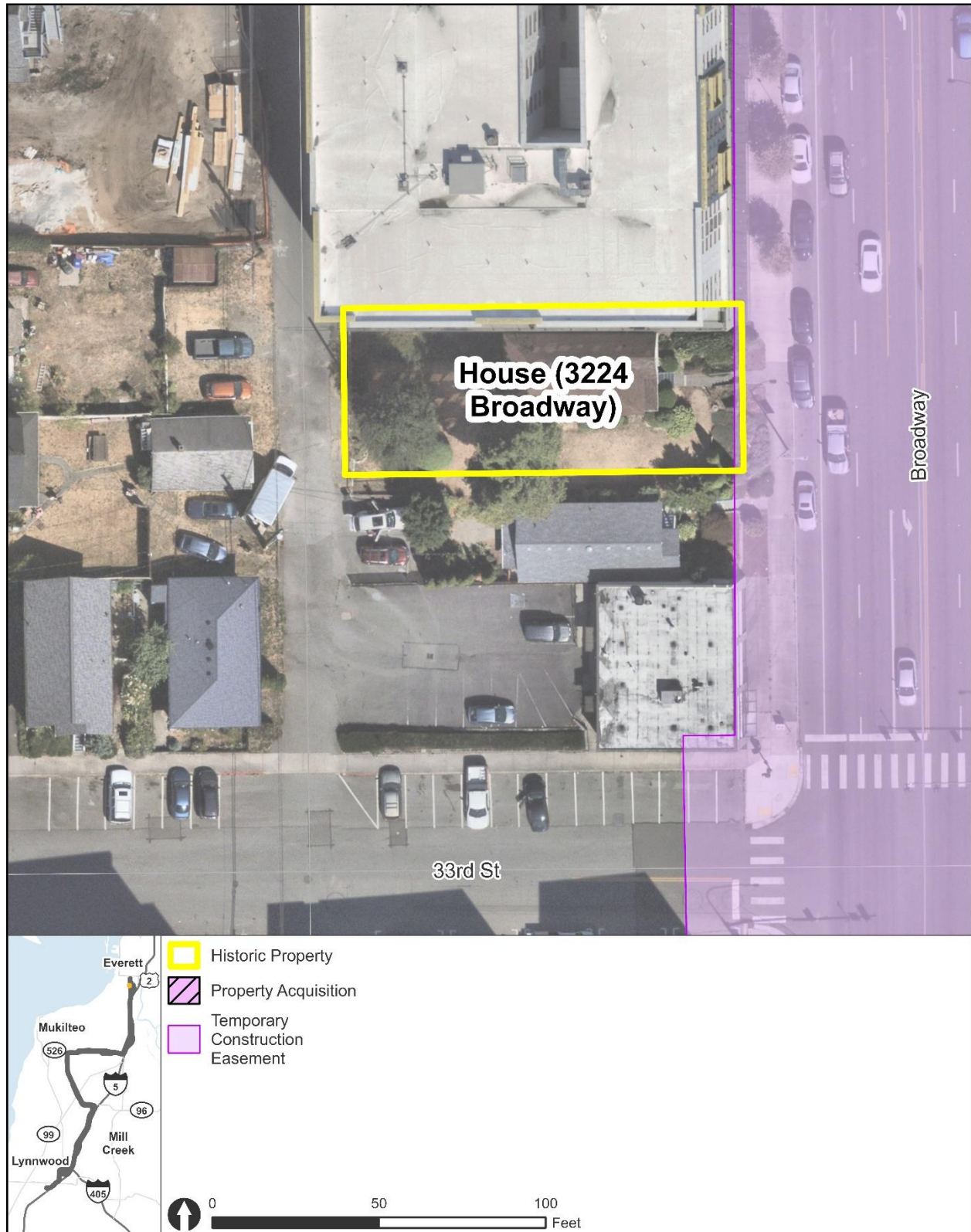
Preliminary Determination: Alternatives EVT-2C and EVT-3D would not constitute a use under Section 4(f) if they satisfy the exception criteria. FTA is consulting with SHPO and anticipates concurrence that this temporary occupancy meets the criteria in 23 CFR 774.13(d). Therefore, FTA has made a preliminary determination that there will be no Section 4(f) use of this property. As part of the Final Section 4(f) Evaluation, FTA will request concurrence in writing from the SHPO.

Figure H4-34 House (3224 Broadway) – Alternative EVT-2C



SOURCE: Snohomish County (2023).

Figure H4-35 House (3224 Broadway) – Alternative EVT-3D



SOURCE: Snohomish County (2023).

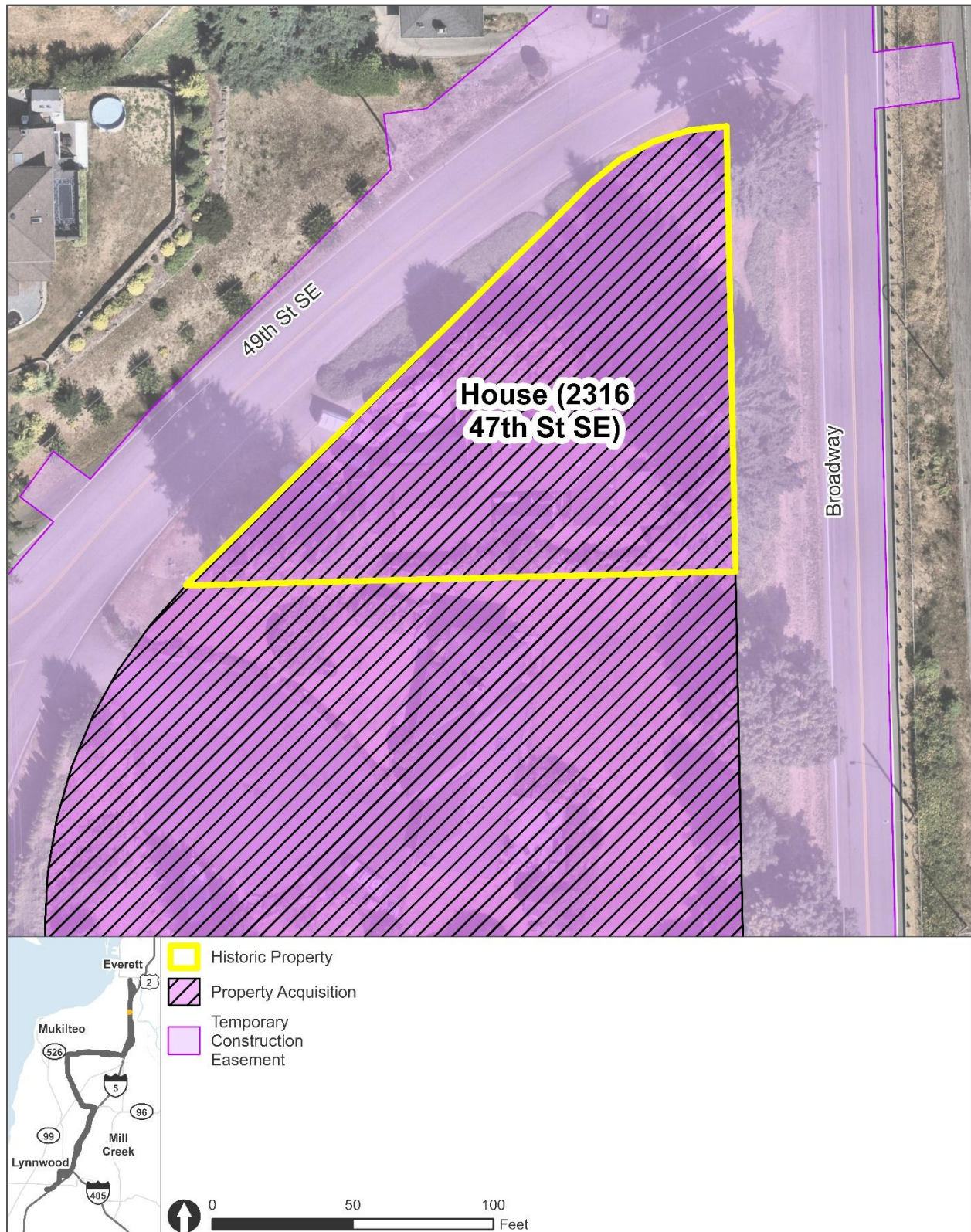
4.9.2.5 House (2316 47th Street SE)

Alternatives EVT-1A, EVT-2C, and EVT-3D

All alternatives in this segment would require acquisition and demolition of this house (see Figure H4-36). FTA, in consultation with the SHPO, has determined that the demolition of this historic property would result in an adverse effect under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

Figure H4-36 House (2316 47th Street SE) – All Everett Station Segment Alternatives



SOURCE: Snohomish County (2023).

4.9.2.6 Milwaukee Road - Everett Depot (3201 McDougall Avenue)

Alternatives EVT-1A and EVT-2C

Alternatives EVT-1A and EVT-2C would require permanent acquisition from this historic property but would avoid demolition of the building (see Figure H4-37 and Figure H4-38). Both alternatives would also require a temporary construction easement. FTA has preliminarily determined that the partial property acquisition and permanent proximity effects to this historic property would result in an adverse effect under Section 106.

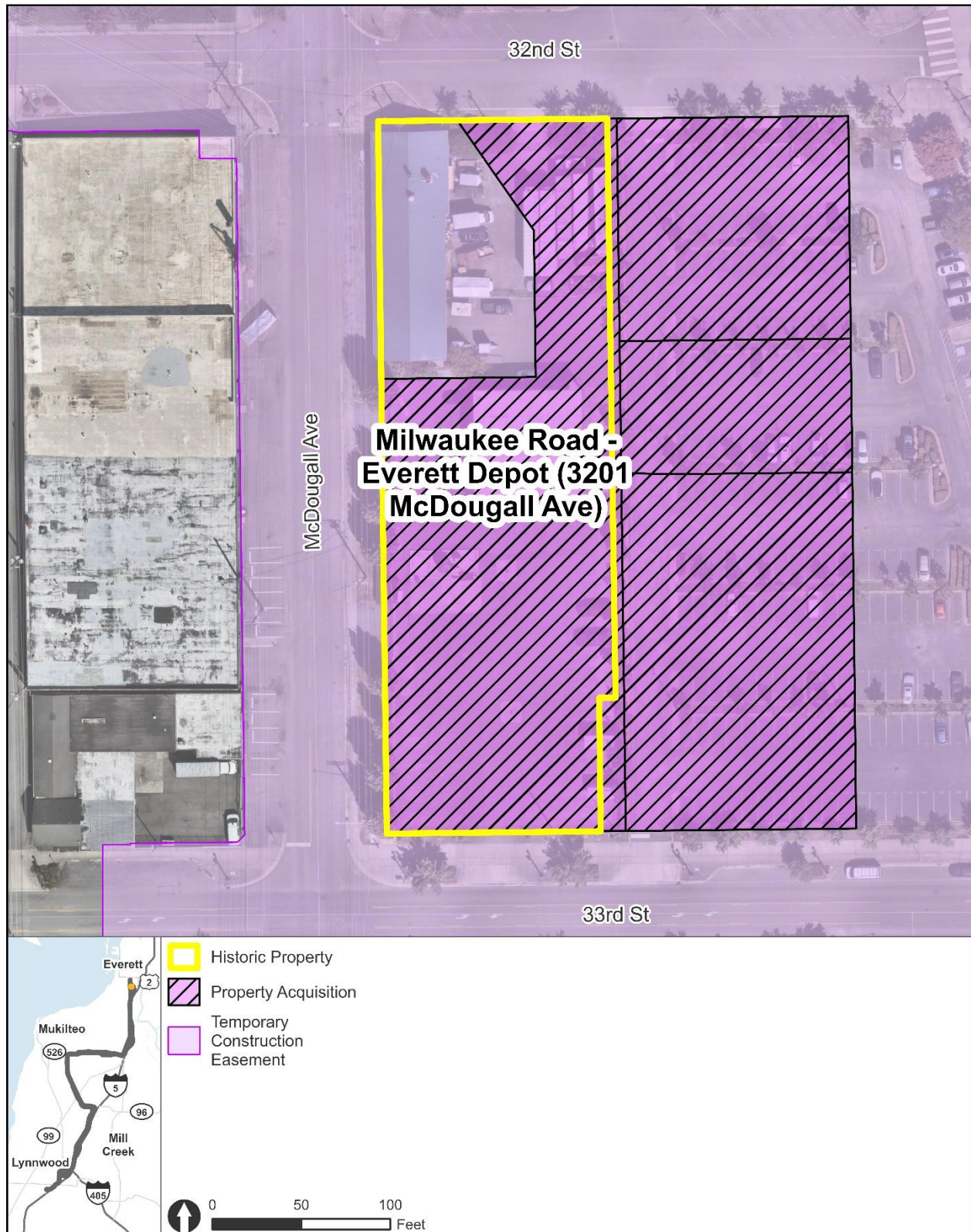
Preliminary Determination: The adverse effect under Section 106 would constitute a use of the Milwaukee Road – Everett Depot historic property under Section 4(f).

Alternative EVT-3D

Alternative EVT-3D would construct an elevated guideway east of Broadway (see Figure H4-39). This alternative would not require permanent acquisition of the property; however, a temporary construction easement would be required. Any areas of the property that are disturbed would be restored to existing conditions or better or replaced. FTA has preliminarily determined that the temporary construction easement would not result in an adverse effect under Section 106. This temporary occupancy is anticipated to meet the exception criteria in 23 CFR 774.13(d) (see Section 1.3) and not constitute a Section 4(f) use.

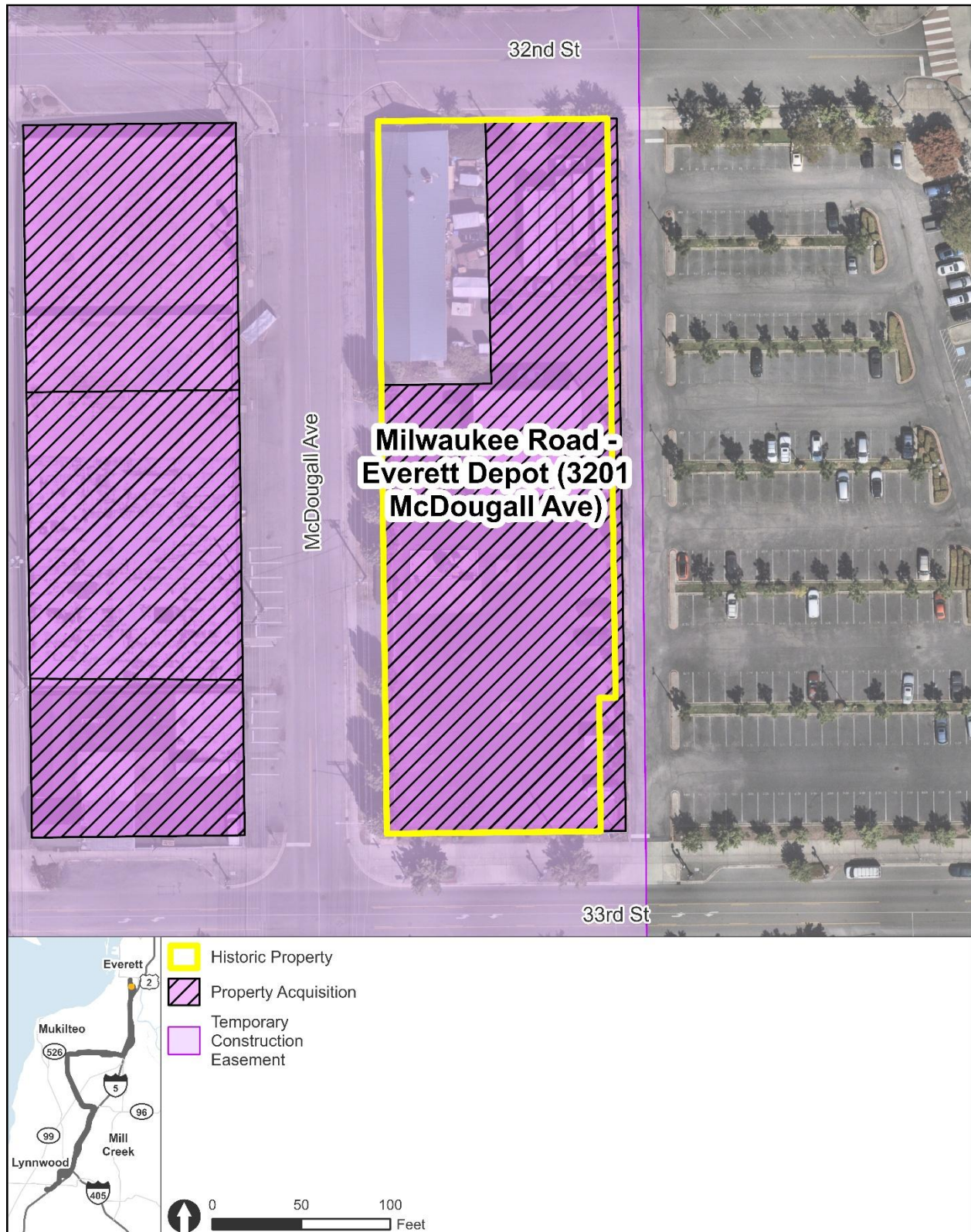
Preliminary Determination: Alternative EVT-3D would not constitute a use under Section 4(f) if it satisfies the exception criteria. FTA is consulting with SHPO and anticipates concurrence that this temporary occupancy meets the criteria in 23 CFR 774.13(d). Therefore, FTA has made a preliminary determination that there will be no Section 4(f) use of this property. As part of the Final Section 4(f) Evaluation, FTA will request concurrence in writing from the SHPO.

Figure H4-37 Milwaukee Road - Everett Depot (3201 McDougall Avenue) – Alternative EVT-1A



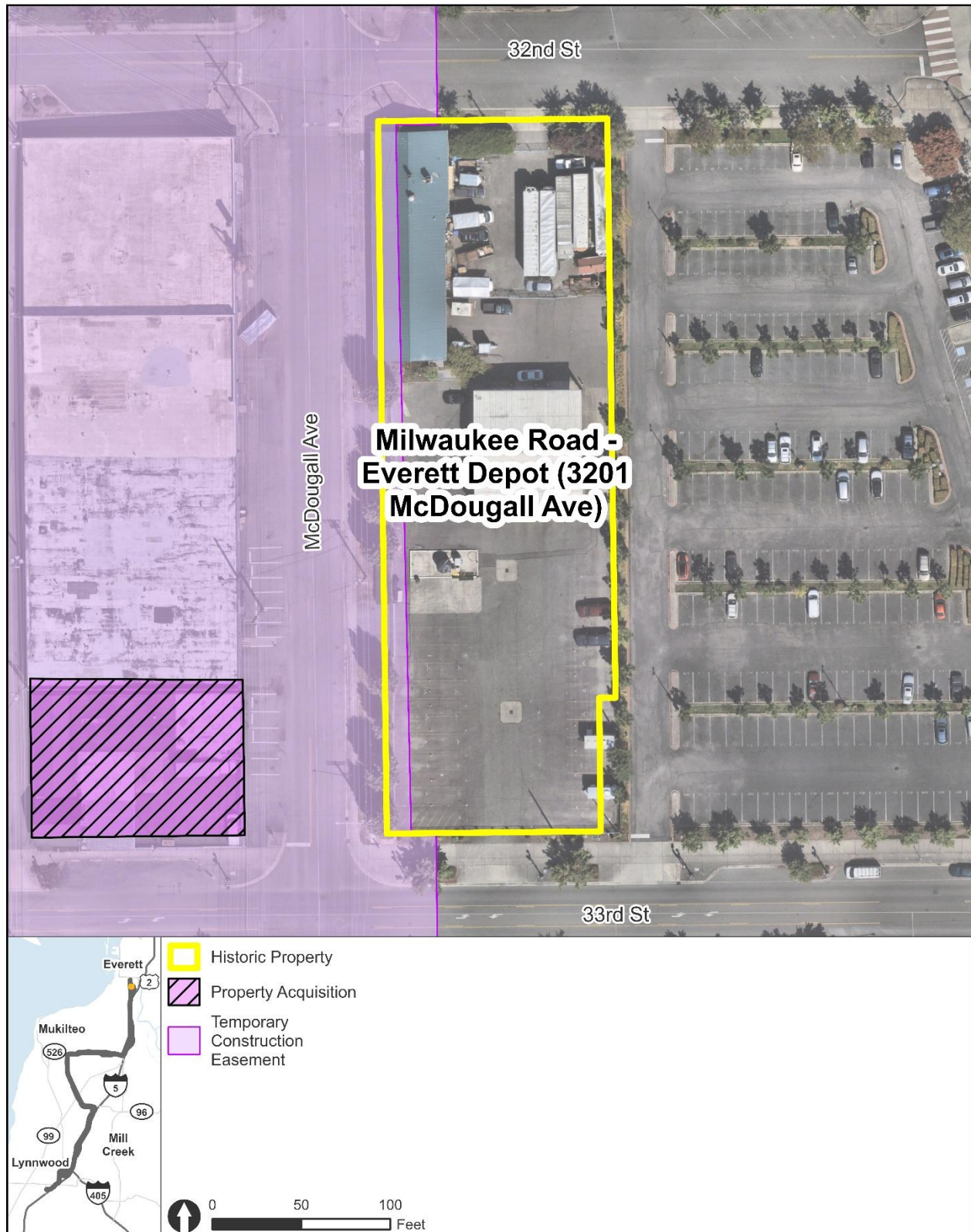
SOURCE: Snohomish County (2023).

Figure H4-38 Milwaukee Road - Everett Depot (3201 McDougall Avenue) – Alternative EVT-2C



SOURCE: Snohomish County (2023).

Figure H4-39 Milwaukee Road - Everett Depot (3201 McDougall Avenue) – Alternative EVT-3D



SOURCE: Snohomish County (2023).

4.9.2.7 Warehouse (3008 McDougall Avenue)

Alternatives EVT-1A and EVT-2C

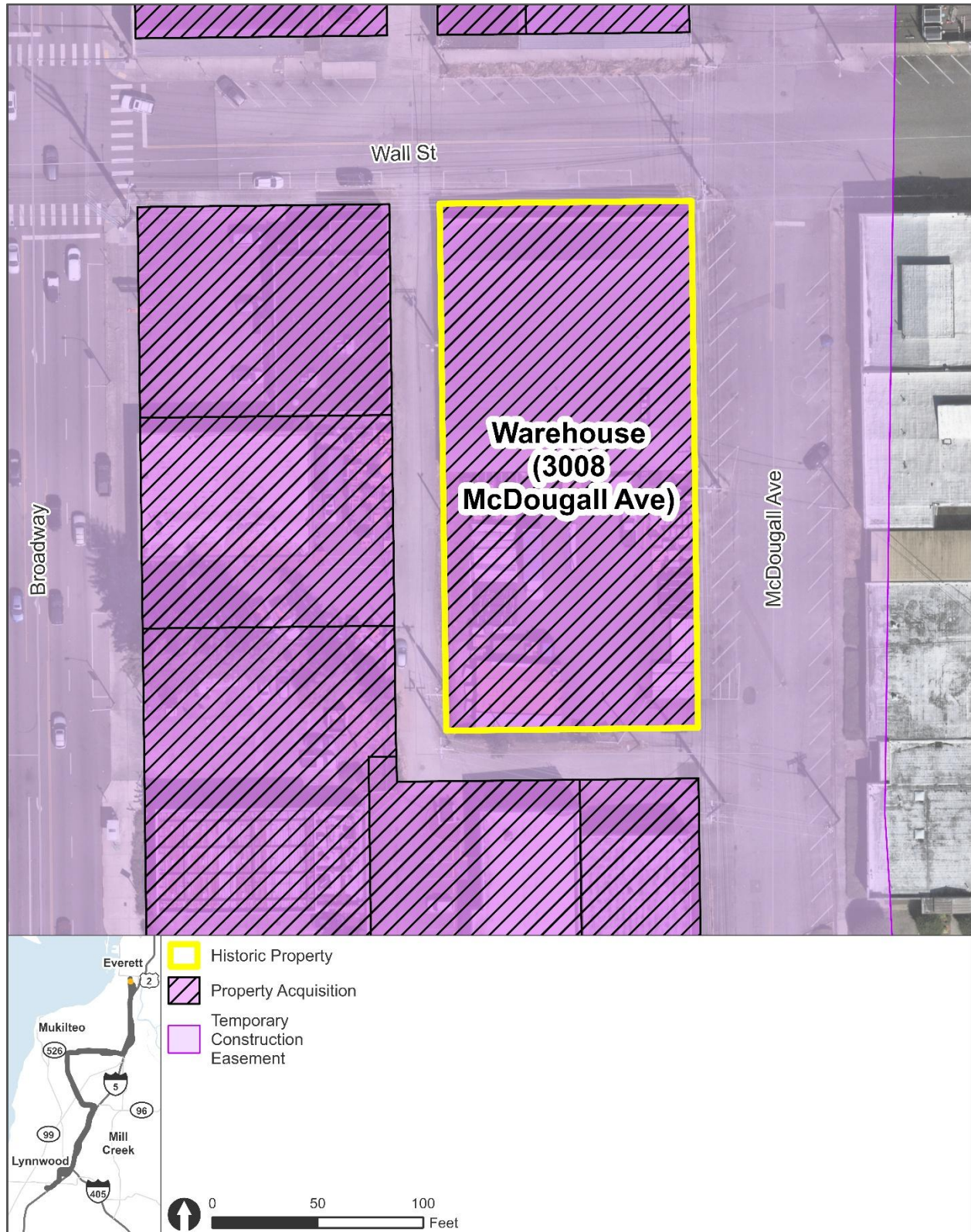
Alternatives EVT-1A and EVT-2C would not impact this property; therefore, there would be no Section 4(f) use.

Alternative EVT-3D

Alternative EVT-3D would require acquisition and demolition of this historic property (see Figure H4-40). FTA has preliminarily determined that the demolition of this building would result in an adverse effect under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

Figure H4-40 Warehouse (3008 McDougall Avenue) – Alternative EVT-3D



SOURCE: Snohomish County (2023).

4.9.2.8 Washington Stove Works (3402 Smith Avenue)

Alternative EVT-1A

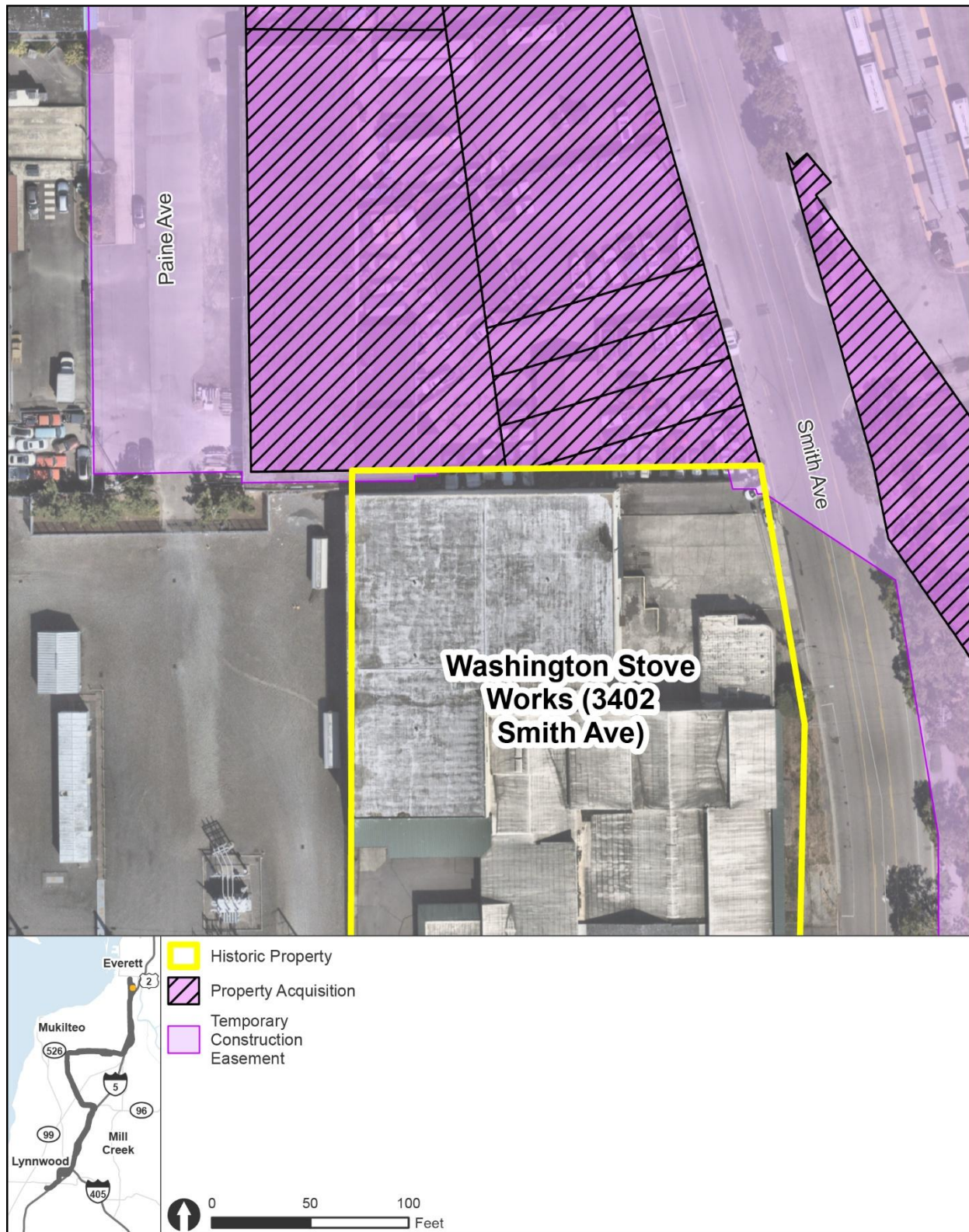
Alternative EVT-1A would require a temporary construction easement on this property (see Figure H4-41). It would not require permanent acquisition of the property. Any areas of the property that are disturbed would be restored to existing conditions or better or replaced. FTA has preliminarily determined that the temporary construction easement would not result in an adverse effect under Section 106. This temporary occupancy is anticipated to meet the exception criteria in 23 CFR 774.13(d) (see Section 1.3) and not constitute a Section 4(f) use.

Preliminary Determination: Alternative EVT-1A would not constitute a use if it satisfies the exception criteria. FTA is consulting with SHPO and anticipates concurrence that this temporary occupancy meets the criteria in 23 CFR 774.13(d). Therefore, FTA has made a preliminary determination that there will be no Section 4(f) use of this property. As part of the Final Section 4(f) Evaluation, FTA will request concurrence in writing from the SHPO.

Alternatives EVT-2C and EVT-3D

Alternatives EVT-2C and EVT-3D would not impact this property; therefore, there would be no Section 4(f) use.

Figure H4-41 Washington Stove Works (3402 Smith Avenue) – Alternative EVT-1A



SOURCE: Snohomish County (2023).

Table H4-9 Preliminary Section 4(f) Use Determinations – Everett Station Segment

Build Alternative	Callahan Plumbing and Heating, Building 1 (3211 Broadway)	Everett Bottling Works (3231 Broadway)	Evergreen Cemetery (4504 Broadway)	House (3224 Broadway)	House (2316 47th Street SE)	Milwaukee Road – Everett Depot (3201 McDougall Avenue)	Warehouse (3008 McDougall Avenue)	Washington Stove Works (3402 Smith Avenue)
EVT-1A	No use (no permanent or temporary impacts)	No use (no permanent or temporary impacts)	<i>De minimis</i> impact	No use (no permanent or temporary impacts)	Use	Use	No use (no permanent or temporary impacts)	No use (temporary occupancy)
EVT-2C	Use	Use	<i>De minimis</i> impact	No use (temporary occupancy)	Use	Use	No use (no permanent or temporary impacts)	No use (no permanent or temporary impacts)
EVT-3D	Use	Use	<i>De minimis</i> impact	No use (temporary occupancy)	Use	No use (temporary occupancy)	Use	No use (no permanent or temporary impacts)

4.10 OMF North Site Alternatives

4.10.1 OMF Site F (SR 99)

Preliminary use determinations for Section 4(f) properties in OMF Site F are described below and summarized in Table H4-10.

4.10.1.1 Parks and Recreational Areas

Neither OMF Site F nor OMF Site F with the Lead Tracks to the West Side of Airport Road Design Option would impact any Section 4(f) parks or recreation areas.

4.10.1.2 Historic Properties

Duplex, Building 1 (12221 Alexander Road)

Both OMF Site F and OMF Site F with the Lead Tracks to the West Side of Airport Road Design Option would require demolition of this historic property, which is eligible for the NRHP as a contributing resource to a historic district (see Figure H4-42). FTA has preliminarily determined that the demolition of this building would result in an adverse effect to a historic district under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

Duplex, Building 2 (12221 Alexander Road)

Both OMF Site F and OMF Site F with the Lead Tracks to the West Side of Airport Road Design Option would require demolition of this historic property, which is eligible for the NRHP as a contributing resource to a historic district (see Figure H4-42). FTA has preliminarily determined that the demolition of this building would result in an adverse effect to a historic district under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

Duplex, Building 3 (12221 Alexander Road)

Both OMF Site F and OMF Site F with the Lead Tracks to the West Side of Airport Road Design Option would require demolition of this historic property, which is eligible for the NRHP as a contributing resource to a historic district (see Figure H4-42). FTA has preliminarily determined that the demolition of this building would result in an adverse effect to a historic district under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

Duplex, Building 4 (12221 Alexander Road)

Both OMF Site F and OMF Site F with the Lead Tracks to the West Side of Airport Road Design Option would require demolition of this historic property, which is eligible for the NRHP as a

contributing resource to a historic district (see Figure H4-42). FTA has preliminarily determined that the demolition of this building would result in an adverse effect to a historic district under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

Duplex, Building 1 (12227 Alexander Road)

Both OMF Site F and OMF Site F with the Lead Tracks to the West Side of Airport Road Design Option would require demolition of this historic property, which is eligible for the NRHP as a contributing resource to a historic district (see Figure H4-42). FTA has preliminarily determined that the demolition of this building would result in an adverse effect to a historic district under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

Duplex, Building 2 (12227 Alexander Road)

Both OMF Site F and OMF Site F with the Lead Tracks to the West Side of Airport Road Design Option would require demolition of this historic property, which is eligible for the NRHP as a contributing resource to a historic district (see Figure H4-42). FTA has preliminarily determined that the demolition of this building would result in an adverse effect to a historic district under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

Duplex, Building 3 (12227 Alexander Road)

Both OMF Site F and OMF Site F with the Lead Tracks to the West Side of Airport Road Design Option would require demolition of this historic property, which is eligible for the NRHP as a contributing resource to a historic district (see Figure H4-42). FTA has preliminarily determined that the demolition of this building would result in an adverse effect to a historic district under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

Empire Industrial Park, Building C (12414 Highway 99)

Both OMF Site F and OMF Site F with the Lead Tracks to the West Side of Airport Road Design Option would require demolition of this historic property (see Figure H4-42). FTA has preliminarily determined that the demolition of this building would result in an adverse effect under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

House, Building A (12217 Alexander Road)

Both OMF Site F and OMF Site F with the Lead Tracks to the West Side of Airport Road Design Option would require demolition of this historic property, which is eligible for the NRHP as a

contributing resource to a historic district (see Figure H4-42). FTA has preliminarily determined that the demolition of this building would result in an adverse effect to a historic district under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

House, Building B (12217 Alexander Road)

Both OMF Site F and OMF Site F with the Lead Tracks to the West Side of Airport Road Design Option would require demolition of this historic property, which is eligible for the NRHP as a contributing resource to a historic district (see Figure H4-42). FTA has preliminarily determined that the demolition of this building would result in an adverse effect to a historic district under Section 106.

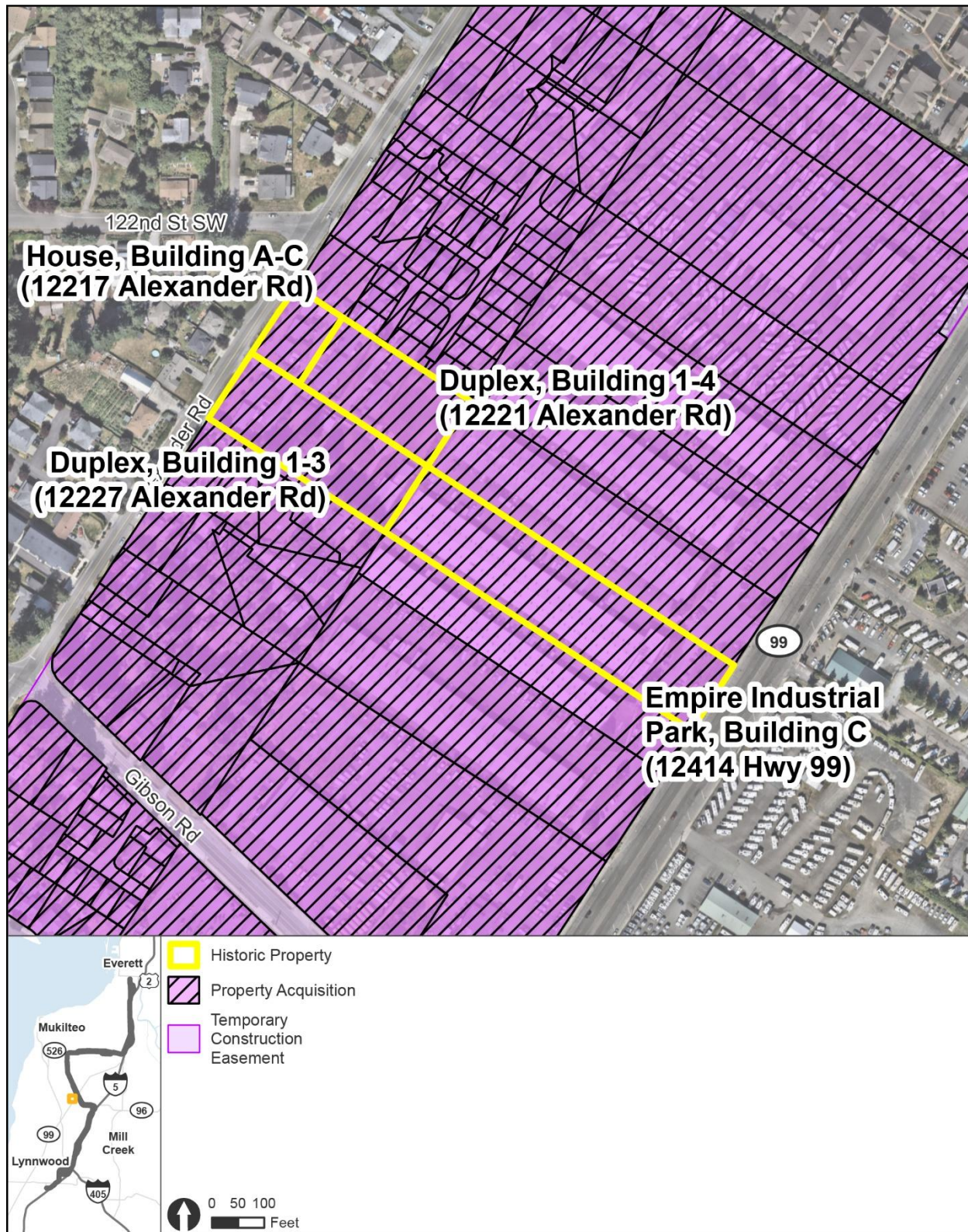
Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

House, Building C (12217 Alexander Road)

Both OMF Site F and OMF Site F with the Lead Tracks to the West Side of Airport Road Design Option would require demolition of this historic property, which is eligible for the NRHP as a contributing resource to a historic district (see Figure H4-42). FTA has preliminarily determined that the demolition of this building would result in an adverse effect to a historic district under Section 106.

Preliminary Determination: The adverse effect under Section 106 would constitute a use of this historic property under Section 4(f).

Figure H4-42 OMF Site F and OMF Site F with the Lead Tracks to the West Side of Airport Road Design Option



SOURCE: Snohomish County (2023).

Table H4-10 Preliminary Section 4(f) Use Determinations – OMF Site F

Build Alternative	Duplex, Building 1 (12221 Alexander Road)	Duplex, Building 2 (12221 Alexander Road)	Duplex, Building 3 (12221 Alexander Road)	Duplex, Building 4 (12221 Alexander Road)	Duplex, Building 1 (12227 Alexander Road)	Duplex, Building 2 (12227 Alexander Road)	Duplex, Building 3 (12227 Alexander Road)	House, Building A (12217 Alexander Road)	House, Building B (12217 Alexander Road)	House, Building C (12217 Alexander Road)	Empire Industrial Park, Building C (12414 Highway 99)
OMF Site F	Use	Use	Use	Use	Use	Use	Use	Use	Use	Use	Use
OMF Site F with Lead Tracks to the West Side of Airport Road Design Option	Use	Use	Use	Use	Use	Use	Use	Use	Use	Use	Use

4.10.2 OMF Site E (Airport Road)

OMF Site E would not impact any Section 4(f) properties; therefore, there would be no Section 4(f) uses.

4.10.3 OMF Site B (SR 526)

Neither OMF Site B nor OMF Site B with the Lead Tracks to South Side of SR 526 Design Option would impact any Section 4(f) properties; therefore, there would be no Section 4(f) uses.

5 AVOIDANCE ALTERNATIVES ANALYSIS

As described in Section 4, Build Alternatives in the West Alderwood, SR 526/Evergreen, Broadway/I-5, and Everett Station Segments and the OMF North site alternatives have potential Section 4(f) uses with greater than *de minimis* impacts. FTA is required to consider whether there are feasible and prudent alternatives that would avoid these uses (see Section 1.4.2 for more information). The *Section 4(f) Policy Paper* (FHWA 2012) states that, along with the No Build Alternative, potential alternatives to avoid the use of Section 4(f) property must be considered and may include the following types of avoidance alternatives:

- **Location Alternatives.** A location alternative refers to rerouting the entire project along a different alignment.
- **Alternative Actions.** An alternative action could be a different mode of transportation, such as rail transit or bus service, or some other action that does not involve construction such as the implementation of transportation management systems or similar measures.
- **Alignment Shifts.** An alignment shift is rerouting a portion of the project to a different alignment to avoid a specific property.
- **Design Changes.** A design change is a modification of the proposed design in a manner that would avoid impacts, such as reducing the planned median width, building a retaining wall, or incorporating design exceptions.

For each segment, a discussion of avoidance alternatives is provided when all Build Alternatives in that segment would result in the use of a Section 4(f) property that would be greater than a *de minimis* impact. The discussion of avoidance alternatives is organized in the same order as the avoidance categories listed above.

5.1 West Alderwood Segment

The alternatives in the West Alderwood Segment could result in uses of up to two Section 4(f) properties (Pacific First Federal Savings and Loan at 3220 188th Street SW and Pioneer First Federal Savings and Loan Association at 4111 Alderwood Mall Boulevard), and none of the Build Alternatives in the West Alderwood Segment would avoid a use of all Section 4(f) properties (see the potential determination summary in Table H4-2). Therefore, an analysis of potential avoidance alternatives is required for this segment.

5.1.1 No Build Alternative

The No Build Alternative includes transit, roadway, and other transportation projects by state, regional, and local agencies that are currently funded or committed, and those that are likely to be implemented based on approved and committed funding as identified in the State Transportation Improvement Plan (Washington Department of Transportation 2023); PSRC Regional Capacity Projects List (PSRC 2022); county and city capital and transportation improvement plans; and county and city capital facilities plans (City of Everett 2022; City of Lynnwood 2022; Snohomish County 2022a; Snohomish County 2022b). The No Build Alternative would avoid the use of all Section 4(f) properties.

As defined in 23 CFR 774.17, an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. The No Build Alternative would be feasible because no construction would be required to implement the alternative.

However, the No Build Alternative would not support the purpose and need of the EVLE Project, provided in Draft EIS Chapter 1. Therefore, the No Build Alternative would not be prudent per 23 CFR 774.17 under the definition of feasible and prudent avoidance alternative, which states: “it compromises the project to a degree that is unreasonable to proceed with the project in light of its stated purpose and need.”

5.1.2 Location Alternatives

In order to meet the project purpose and need, the EVLE Project must extend light rail north from the existing Lynnwood Transit Center to downtown Everett via the SW Everett Industrial Center, as identified in the ST3 Plan. Six stations were identified in ST3, intended to serve the areas of West Alderwood Mall, Ash Way, Mariner, SW Everett Industrial Center, SR 526 near Evergreen Way, and the existing Everett Station. A seventh station was identified at Airport Road/SR 99 as a provisional station that would be built upon funding availability. As location alternatives refer to the rerouting of the entire project along a different alignment, a location alternative to the EVLE Project would not serve the areas along the project corridor identified in ST3; therefore, location alternatives would not be prudent per 23 CFR 774.17 under the definition of feasible and prudent avoidance alternative, which states: “it compromises the project to a degree that is unreasonable to proceed with the project in light of its stated purpose and need.”

5.1.3 Alternative Actions

Alternative actions, which include other modes of transportation, were evaluated and not carried forward during ST3 Plan development. ST3 defined the mode for this project as light rail, and providing light rail service as reflected in the ST3 Plan is part of the project’s purpose and need. Therefore, alternative modes of transportation would not be prudent per 23 CFR 774.17 under the definition of feasible and prudent avoidance alternative, which states: “it compromises the project to a degree that is unreasonable to proceed with the project in light of its stated purpose and need.”

5.1.4 Alignment Shifts

During the Alternatives Development phase leading up to the identification of alternatives to be evaluated in the Draft EIS, FTA and Sound Transit considered a wide range of potential

alternatives, including different alignments and station locations (see Draft EIS Appendix B). The following sections describe the alignment shifts considered in the Draft EIS or during the Alternatives Development phase that would avoid at least one of the uses. These alignment shifts are also shown on Figure H5-1.

As described below, there is no feasible and prudent alternative that avoids all Section 4(f) uses for the West Alderwood Segment. The primary factor affecting the prudence of avoidance alternatives is the conflict with Pioneer First Federal Savings and Loan Association due to the location of tail tracks extending from Lynnwood City Center Station and the City of Lynnwood's planned reconstruction of Alderwood Mall Boulevard (City of Lynnwood 2025).

5.1.4.1 Alternatives ALD-1B and ALD-1B with Alderwood Mall Boulevard Design Option

There would be a use of Pacific First Federal Savings and Loan and a use of Pioneer First Federal Savings and Loan Association under Alternatives ALD-2D, ALD-2D with Alderwood Mall Boulevard Design Option, ALD-2F, and ALD-2F with Alderwood Mall Boulevard Design Option. Use of Pacific First Federal Savings and Loan would be avoided in Alternatives ALD-1B and ALD-1B with Alderwood Mall Boulevard Design Option; however, both of these alternatives would result in the use of Pioneer First Federal Savings and Loan Association. Therefore, neither alternative is a Section 4(f) avoidance alternative.

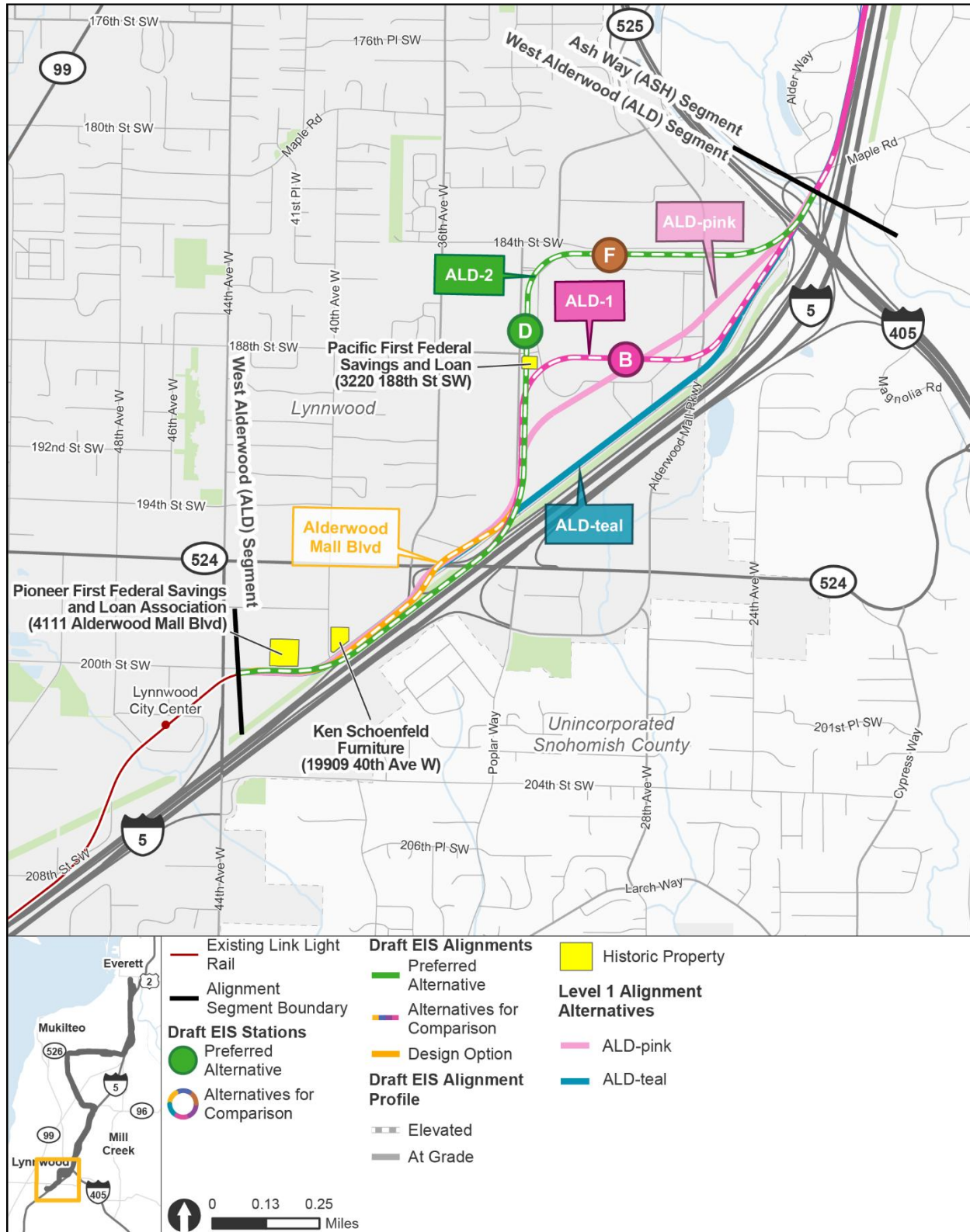
5.1.4.2 ST3 Representative Project (ALD-pink)

ALD-pink was included in the Level 1 Evaluation during the Alternatives Development phase (see Draft EIS Appendix B). ALD-pink is the ST3 representative project and would extend on a diagonal through Alderwood Mall with a station near the existing AMC theater. It would avoid a use of Pacific First Federal Savings and Loan. This alignment alternative would not avoid a use of the Pioneer First Federal Savings and Loan Association. Therefore, ALD-pink is not a Section 4(f) avoidance alternative.

5.1.4.3 Northwest Side of I-5 Alignment (ALD-teal)

ALD-teal was included in the Level 1 Evaluation during the Alternatives Development phase (see Draft EIS Appendix B). ALD-teal would avoid a use of Pacific First Federal Savings and Loan by routing along the northwest side of I-5 with a station on Alderwood Mall Boulevard. This alignment alternative would not avoid a use of the Pioneer First Federal Savings and Loan Association. Therefore, ALD-teal is not a Section 4(f) avoidance alternative.

Figure H5-1 Potential Alignment Shifts Considered – West Alderwood Segment



SOURCE: City of Lynnwood (2023); Snohomish County (2023).

5.1.5 Design Changes

As design for the EVLE Project progresses, Sound Transit continues to look for opportunities to reduce project impacts, including the use of Section 4(f) properties. However, there are notable constraints that inform the design in this area, as described below.

The existing Lynnwood City Center Station, located near the intersection of Alderwood Mall Boulevard and 44th Avenue, would be the southern terminus station for the EVLE Project. Construction of the Lynnwood City Center Station included tail tracks that extend across 44th Avenue West and end to the south of Alderwood Mall Boulevard. The EVLE Project alignment in the West Alderwood Segment would connect to these tail tracks (shown on Figure H5-1).

In addition, the City of Lynnwood plans to reconstruct Alderwood Mall Boulevard to be consistent with the City's *Alderwood City Center Design Guidelines*, which envisions the roadway as a five-lane section with dual left turn lanes for westbound Alderwood Mall Boulevard to southbound 44th Avenue.

Due to the fixed point of the existing light rail terminus, the EVLE Project cannot be designed with adequate vertical clearance over the existing Alderwood Mall Boulevard. The reconstructed roadway would need to shift north to provide the required vertical clearance. This shift would require approximately 30 feet of acquisition of the Pioneer First Federal Savings and Loan Association parcel, which is on the north side of Alderwood Mall Boulevard.

Measures to minimize impacts are further discussed in Section 6.

5.2 Ash Way Segment

Both of the Ash Way Segment alternatives would avoid a use of any Section 4(f) properties; therefore, consideration of avoidance alternatives is not required.

5.3 Mariner Segment

Each of the four Mariner Segment alternatives would avoid a use of any Section 4(f) properties; therefore, consideration of avoidance alternatives is not required.

5.4 SR 99/Airport Road Segment

Neither of the SR 99/Airport Road Segment alternatives would result in a use of Section 4(f) property that is greater than a *de minimis* impact; therefore, consideration of avoidance alternatives is not required.

5.5 SW Everett Industrial Center Segment

None of the SW Everett Industrial Center Segment alternatives would result in a use of Section 4(f) property that is greater than a *de minimis* impact; therefore, consideration of avoidance alternatives is not required.

5.6 SR 526/Evergreen Segment

Alternatives EGN-1A, EGN-3E, and EGN-3E with North Side of SR 526 Design Option could each result in the use of one Section 4(f) property that is greater than a *de minimis* impact (House at 8102 W Glen Drive or General Telephone Company at 426 E Casino Road). However, Alternatives EGN-2B and EGN-2B with North Side of SR 526 Design Option would not result in a use of Section 4(f) property that is greater than a *de minimis* impact. Therefore, consideration of avoidance alternatives is not required.

5.7 Broadway/I-5 Segment

The alternatives in the Broadway/I-5 Segment could result in uses of up to two Section 4(f) properties (Lexington Arms Apartments at 2508 Lexington Avenue, House at 5529 Commercial Avenue, and/or House at 2118 Jefferson Place) that are greater than a *de minimis* impact. Neither would avoid a use of all Section 4(f) properties (see the potential determination summary table in Table H4-8). Therefore, an analysis of potential avoidance alternatives is required for this segment.

5.7.1 No Build Alternative

As described in the West Alderwood Segment No Build Alternative discussion (Section 5.1.1), the No Build Alternative would not be prudent per 23 CFR 774.17 under the definition of feasible and prudent avoidance alternative.

5.7.2 Location Alternative

As described in the West Alderwood Segment Location Alternative discussion (Section 5.1.2), location alternatives would not be prudent per 23 CFR 774.17 under the definition of feasible and prudent avoidance alternative.

5.7.3 Alternative Actions

As described in the West Alderwood Segment Alternative Actions discussion (Section 5.1.3), alternative actions would not be prudent per 23 CFR 774.17 under the definition of feasible and prudent avoidance alternative.

5.7.4 Alignment Shifts

During the Alternatives Development phase leading up to the identification of alternatives to be evaluated in the Draft EIS, FTA and Sound Transit considered a wide range of potential alternatives, including different alignments and station locations (see Draft EIS Appendix B). The following sections describe the alignment shift considered during the Alternatives Development phase that would avoid at least one of the uses, shown on Figure H5-2 and Figure H5-3.

As described below, there is no feasible and prudent alternative that avoids use of all Section 4(f) properties for the Broadway/I-5 Segment.

5.7.4.1 Rucker Avenue Alternative (BI-H)

During initial Alternatives Development and screening, an alignment (BI-H) was considered that would extend the project north from SR 526 along Evergreen Way to Rucker Avenue, rather than along Broadway or I-5. One station option was associated with this alternative in downtown Everett on Rucker Avenue. This alternative would shift a portion of the SR 526/Evergreen Segment as well as the entirety of the Broadway/I-5 and Everett Station Segments.

BI-H would avoid the use of 5529 Commercial Avenue, 2118 Jefferson Place, and Lexington Arms Apartments. However, it was eliminated during alternatives screening as it was inconsistent with the route identified in the ST3 Plan. Further, the alignment terminus would have required relocation of an existing transit center, separating local transit from regional and commuter rail. The technical feasibility of this alternative was ranked as poor; it would require a center-running light rail guideway on Rucker Avenue, which would narrow or eliminate vehicular travel lanes. The alignment would limit access to businesses and residences along the corridor and the necessary roadway reconstruction and aerial guideway would be costly. Initial screening identified 15 known historic properties eligible for or listed in the NRHP or local registers, one known and documented historic-era archaeological property, and one park within 150 feet of the alignment. The BI-H alternative could impact additional Section 4(f) properties.

The BI-H alternative from the preliminary screening would not be prudent per 23 CFR 774.17 under the definition of feasible and prudent avoidance alternative which states: “it compromises the project to a degree that is unreasonable to proceed with the project in light of its stated purpose and need.” It would also not be prudent per paragraph 3(iii), which states: “it still causes severe impacts to environmental resources protected under other Federal statutes.” Therefore, it is not a Section 4(f) avoidance alternative.

Figure H5-2 Potential Alignment Shifts Considered – Broadway/I-5 Segment (South)



SOURCE: City of Everett (2024); Snohomish County (2023).

Figure H5-3 Potential Alignment Shifts Considered – Broadway/I-5 Segment (North)



SOURCE: City of Everett (2024); Snohomish County (2023).

5.7.5 Design Changes

As design for the EVLE Project progresses, Sound Transit continues to look for opportunities to reduce project impacts, including the use of Section 4(f) properties. Measures to minimize impacts are further discussed in Section 6.

5.8 Everett Station Segment

The alternatives in the Everett Station Segment could result in uses of up to four Section 4(f) properties that are greater than a *de minimis* impact (Callahan Plumbing and Heating, Building 1 at 3211 Broadway, Everett Bottling Works at 3231 Broadway, House at 2316 47th Street SE, Milwaukee Road – Everett Depot at 3201 McDougall Avenue, and/or Warehouse at 3008 McDougall Avenue). None of the Build Alternatives in the Everett Station Segment would avoid a use of all Section 4(f) properties (see the potential determination summary in Table H4-9). Therefore, an analysis of potential avoidance alternatives is required for this segment.

5.8.1 No Build Alternative

As described in the West Alderwood Segment No Build Alternative discussion (Section 5.1.1), the No Build Alternative would not be prudent per 23 CFR 774.17 under the definition of feasible and prudent avoidance alternative.

5.8.2 Location Alternative

As described in the West Alderwood Segment Location Alternative discussion (Section 5.1.2), location alternatives would not be prudent per 23 CFR 774.17 under the definition of feasible and prudent avoidance alternative.

5.8.3 Alternative Actions

As described in the West Alderwood Segment Alternative Actions discussion (Section 5.1.3), alternative actions would not be prudent per 23 CFR 774.17 under the definition of feasible and prudent avoidance alternative.

5.8.4 Alignment Shifts

During the Alternatives Development phase leading up to the identification of alternatives to be evaluated in the Draft EIS, FTA and Sound Transit considered a wide range of potential alternatives, including different alignment and station locations (see Draft EIS Appendix B). The following sections describe the alignment shifts considered during the Alternatives Development phase that would avoid at least one of the uses, shown on Figure H5-4 and Figure H5-5.

As described below, there is no feasible and prudent alternative that avoids use of all Section 4(f) properties for the Everett Station Segment.

5.8.4.1 Rucker Avenue Alternative (EVT-H)

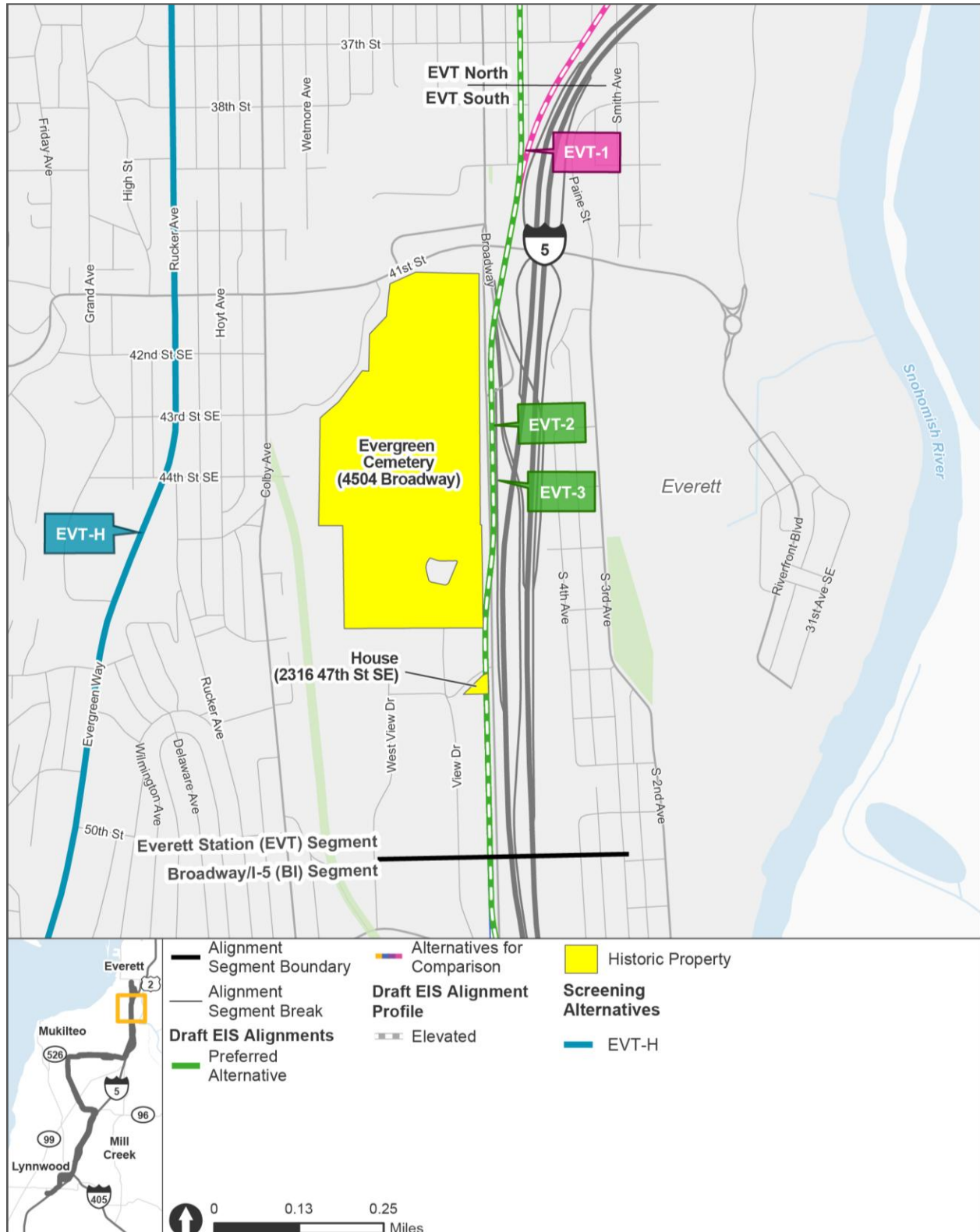
As described in the Broadway/I-5 Segment Alignment Shifts discussion (Section 5.7.4), an alignment was considered that would extend the project north from SR 526 along Evergreen

Way to Rucker Avenue (EVT-H). This alternative would shift the entire Everett Station Segment and have one station option located in downtown Everett on Rucker Avenue.

EVT-H would avoid the use of Callahan Plumbing and Heating, Building 1 at 3211 Broadway, Everett Bottling Works at 3231 Broadway, House at 2316 47th Street SE, Milwaukee Road – Everett Depot at 3201 McDougall Avenue, and Warehouse at 3008 McDougall Avenue. However, it was eliminated during alternatives screening as it was inconsistent with the route identified in the ST3 Plan. Further, the alignment terminus would have required relocation of an existing transit center, separating local transit from regional and commuter rail. The technical feasibility of this analysis was ranked as poor; it would require a center-running light rail guideway on Rucker Avenue, which would narrow or eliminate vehicular travel lanes. The alignment would limit access to businesses and residences along the corridor and the necessary roadway reconstruction and aerial guideway would be costly. Initial screening identified 15 known historic properties eligible for or listed in the NRHP or local registers, one known and documented historic-era archaeological resource, and one park within 150 feet of the alignment. The EVT-H alternative could impact additional Section 4(f) properties.

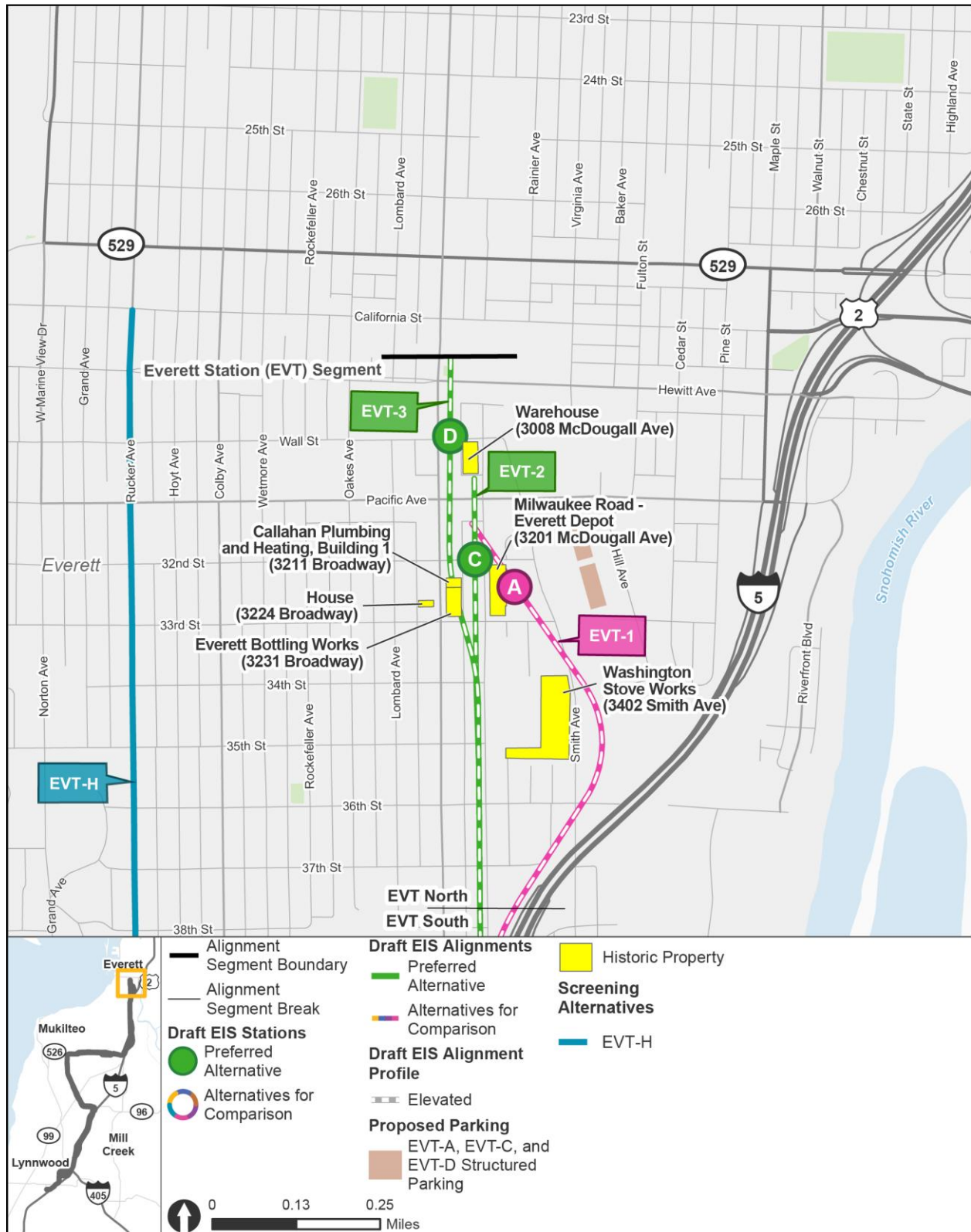
The EVT-H alternative from the preliminary screening would not be prudent per 23 CFR 774.17 under the definition of feasible and prudent avoidance alternative, which states: “it compromises the project to a degree that is unreasonable to proceed with the project in light of its stated purpose and need.” It would also not be prudent per 23 CFR 774.17, which states: “it still causes severe impacts to environmental resources protected under other Federal statutes.” Therefore, it is not a Section 4(f) avoidance alternative.

Figure H5-4 Potential Alignment Shifts Considered – Everett Station Segment (South)



SOURCE: City of Everett (2024); Snohomish County (2023).

Figure H5-5 Potential Alignment Shifts Considered – Everett Station Segment (North)



SOURCE: City of Everett (2024); Snohomish County (2023).

5.8.5 Design Changes

As design for the EVLE Project progresses, Sound Transit continues to look for opportunities to reduce project impacts, including the use of Section 4(f) properties. Measures to minimize impacts are further discussed in Section 6.

5.9 OMF North Site Alternatives

There would be a use of the following properties under the OMF Site F alternatives that would be greater than a *de minimis* impact: Duplex, Buildings 1-4 (12221 Alexander Road); Duplex, Buildings 1-3 (12227 Alexander Road); Empire Industrial Park, Building C (12414 Highway 99); and House, Buildings A, B, and C (12217 Alexander Road). Use of these properties would be avoided under OMF Sites B and E. OMF Sites B and E would also not result in the use of other Section 4(f) properties. Therefore, consideration of avoidance alternatives is not required.

6 MEASURES TO MINIMIZE HARM

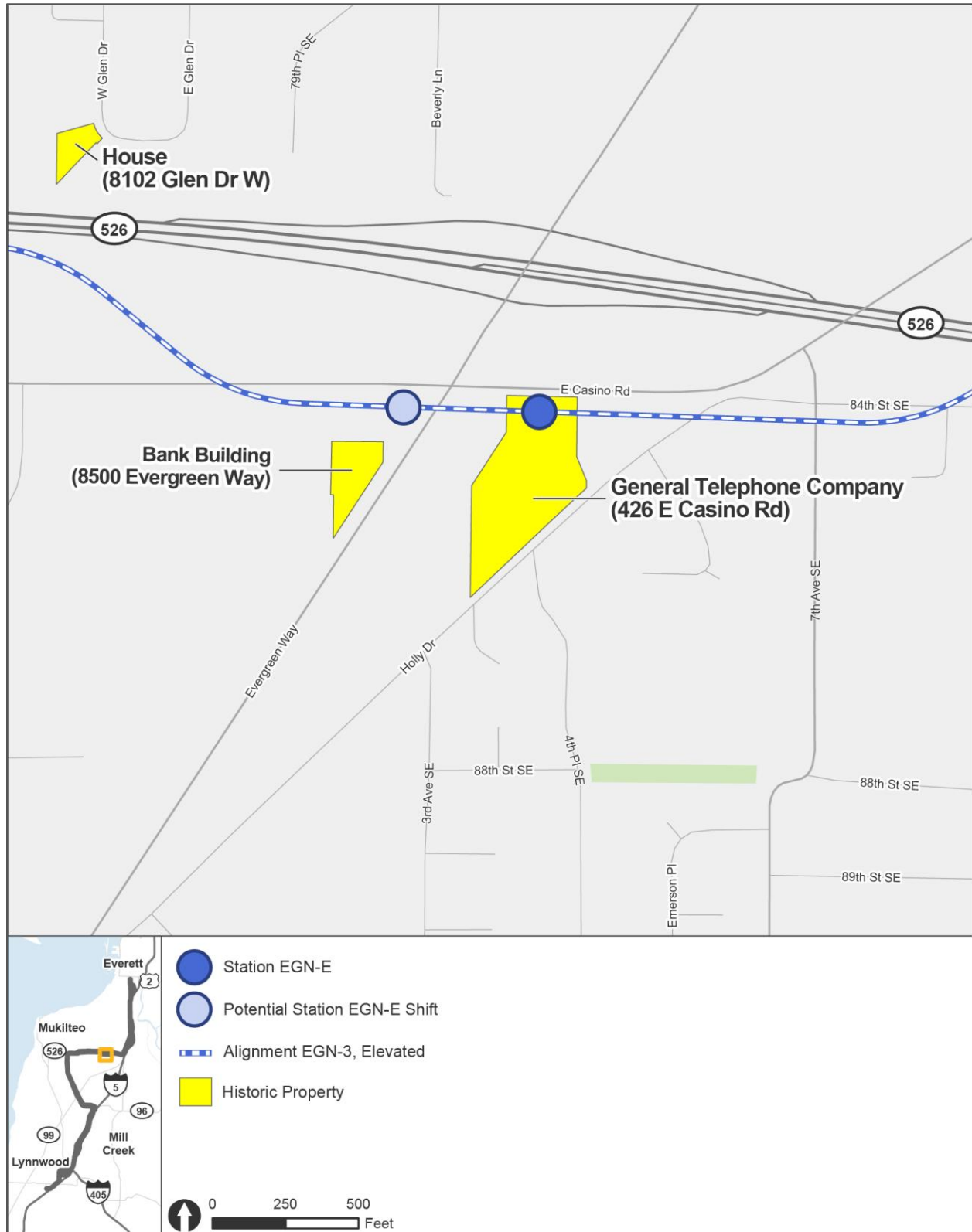
Much of the study area is in a highly developed, urban area, and there are many design constraints unique to light rail that must be considered. These include specific grade requirements depending on vertical curve spacing and minimum horizontal curve radii (which means the guideway cannot make sharp turns); grade requirements for station platforms; and elevated guideway span and column size and type requirements.

Sound Transit has sought to locate the project within existing public transportation right-of-way where possible to reduce impacts to public and private property, including Section 4(f) properties, and to reduce the cost associated with property acquisition. When considering impacts to historic properties, designers first considered all possible measures to avoid and minimize impacts to each property. Demolition is only proposed when no options exist to avoid or minimize impacts.

Methods of minimization and avoidance included adjustments to the horizontal alignment, vertical profile, and placement of stations and support facilities. These design adjustments are included in the Build Alternatives that are being evaluated.

Additionally, Sound Transit will continue to look for additional opportunities to reduce property impacts as the design for the project progresses, including impacts on Section 4(f) properties. An example of a potential design refinement that may avoid impacts on a Section 4(f) property is a shift of Station EGN-E from the east side of Evergreen Way to the west side of Evergreen Way. Shifting the station may avoid a use of the General Telephone Company at 426 E Casino Road under Alternative EGN-3E (see Figure H6-1). Design refinements made to avoid or minimize harm to Section 4(f) properties will be considered in the Final Section 4(f) Evaluation.

Figure H6-1 Potential Design Refinement to Minimize Harm to a Section 4(f) Property



6.1 Minimization of Visual Effects

Specific measures to minimize visual effects include the implementation of design guidelines.⁶ Design guidelines that would be incorporated where practical include:

- Sound Transit would develop specific design criteria for the EVLE Project that would guide project design through a balanced set of systemwide elements and contextual elements, such as a consistent architectural theme for elevated elements and stations, consistent signage, and a systemwide art program. These criteria would be developed by interdisciplinary teams with input from local communities and jurisdictional partners and integrate these criteria with existing plans, including plans for redevelopment.
- Sound Transit would coordinate with jurisdictional partners and adjacent communities through design review to promote visual unity in station areas.
- Sound Transit would surplus the remainder of the parcels not needed after construction, which could potentially be redeveloped consistent with Sound Transit's Transit Oriented Development Policies and jurisdictional partners' plans.
- When possible, Sound Transit would preserve existing vegetation.
- Sound Transit would plant appropriate vegetation within and adjoining the project right-of-way, or where required by the authority having jurisdiction (including potentially outside of the project right-of-way), to replace existing street trees and other visually important vegetation removed for the project, or to provide screening for sensitive visual environments and/or sensitive viewers. New plantings would be consistent with Sound Transit operations and maintenance requirements and jurisdictional requirements.
- Sound Transit would design exterior lighting at stations, tail tracks, and hi-rail access to minimize height and use source shielding to avoid lighting bulbs that would be directly visible from residential areas, streets, and highways above allowable levels. Shielding would also limit spillover light and glare in residential areas.
- During construction, Sound Transit would provide visual screening along some areas where construction activities would be seen by nearby sensitive viewers. Visual screening would include construction of a fence or visual barrier to screen ground-level views into construction areas where practical. Nighttime construction lighting would be shielded and directed downward to avoid light spillover onto adjacent sensitive uses.

6.2 Minimization of Noise and Vibration Effects

The Noise and Vibration Technical Report in Draft EIS Appendix G.8 provides a description of means to reduce and monitor potential noise and vibration effects during construction and operation. Key noise and vibration minimization strategies relevant to Section 4(f) properties are summarized below.

Although noise-related adverse effects to historic properties are not anticipated, for locations where Sound Transit has identified potential noise impacts, mitigation measures would be considered and reviewed using Sound Transit's Link Light Rail Noise and Vibration Policy

⁶ For more information, see the Visual and Aesthetic Resources Technical Report in Draft EIS Appendix G.6.

(Sound Transit 2023). Under this policy, potential mitigation measures would be considered for noise sensitive receivers meeting FTA impact criteria.

Sound Transit's noise mitigation policy is to mitigate both moderate and severe impacts beginning with source treatment, followed by treatments in the noise path. If source and path treatments are not sufficient to mitigate the impact, Sound Transit would evaluate and implement sound insulation at affected properties where the existing building does not already achieve sufficient exterior-to-interior reduction of noise levels.

For most identified noise impacts, sound walls were the selected method of reducing noise levels, consistent with Sound Transit's Link Light Rail Noise and Vibration Policy (Sound Transit 2023). Sound walls are effective at eliminating most predicted noise impacts.

All construction activities would be required to comply with codified sound limits. Nighttime construction would require a noise variance from the local jurisdiction. Noise mitigation would likely be required for construction activities to comply with local codes or limits established by a variance.

Specific construction vibration mitigation measures will be developed during the design phase of the project when more detailed construction information is available.

The following mitigation measures would be applied as needed to minimize temporary construction noise and vibration impacts:

- Avoiding nighttime construction in residential neighborhoods.
- Locating stationary construction equipment as far as possible from noise-sensitive sites.
- Constructing noise barriers, such as temporary walls or piles of excavated material, between noisy activities and noise-sensitive receivers.
- Routing construction-related truck traffic to roadways that would cause the least disturbance to residents.
- Using alternative construction methods to minimize the use of impact and vibratory equipment (e.g., pile-drivers and compactors).

6.3 Park and Recreation Measures to Minimize Harm

Typical measures to minimize harm to park and recreational areas include the following:

- During construction, pedestrian access to Section 4(f) segments of the Interurban Trail would be routed to the remaining open portions of the trail to ensure continued use and enjoyment of the facility.
- Replacement of facilities impacted by the project including sidewalks, paths, benches, lights, trees, and other facilities.
- Restoration and landscaping of disturbed areas.
- Incorporation of design features and habitat features where necessary to reduce or minimize impacts to the Section 4(f) property.

- Payment of the fair market value of the land and improvements taken or improvements to the remaining Section 4(f) site equal to the fair market value of the land and improvements taken.

Sound Transit has made design changes during the alternatives design process and will continue to do so throughout the project design to minimize impacts on park and recreational areas.

6.4 Historic Properties Measures to Minimize Harm

Measures to minimize or mitigate harm to Section 4(f) historic properties, beyond the design measures already included in the project, are not fully known at this time as Sound Transit and FTA continue to consult with the SHPO, Tribes, and other consulting parties. These measures will be coordinated with the SHPO, local jurisdictions, and interested parties (as applicable). They will also be memorialized in the Section 106 Programmatic Agreement for this project, consistent with Section 106 of the National Historic Preservation Act. A draft Section 106 Programmatic Agreement is included in the Historic and Archaeological Resources Technical Report in Draft EIS Appendix G.17; an agreement will be executed prior to FTA's issuance of a Record of Decision. The following typical mitigation measures for impacts to historic properties are from the Historic and Archaeological Resources Technical Report in Draft EIS Appendix G.17:

- Seismically or structurally upgrade buildings that might be subject to structural impacts.
- Take precautions that historic properties are protected from vibrations, excavations, and damage from heavy equipment.
- Protect facades of affected historic buildings from an accumulation of excessive dirt and dust during construction, and/or clean them in an appropriate manner at the conclusion of construction. Sound Transit would consult with the SHPO before implementing any protection or cleaning methods.
- Control fugitive dust using measures listed in the Air Quality Technical Report in Draft EIS Appendix G.7.
- Maintain access to historic properties to the extent possible.
- Restrict construction haul routes to existing, heavily used public rights-of-way and avoid historic districts when practicable.

7 DE MINIMIS IMPACTS

Based on FTA's preliminary determinations, there would be no Section 4(f) use of park and recreational areas and a *de minimis* impact finding would not be applicable. FTA has preliminarily determined that the impacts to five historic properties would not result in adverse effects under Section 106. As such, impacts to these properties are proposed to be *de minimis* under Section 4(f). The historic properties and the Build Alternatives they would be impacted by are listed below. Additional property impact details are provided in Section 4.

- **Service Station (2210 112th Street SW):** Alternative AIR-2B.

- **General Telephone Company Facility (2403 W Casino Road):** Alternatives SWI-1A, SWI-1A with Lower Design Option, SWI-1B, and SWI-1C.
- **House (1322 Ballew Avenue):** Alternatives EGN-1A, EGN-2B, EGN-2B with North Side of SR 526 Design Option, EGN-3E, and EGN-3E with North Side of SR 526 Design Option.
- **Bank Building (8500 Evergreen Way):** Alternatives EGN-2B, EGN-2B with North Side of SR 526 Design Option, EGN-3E, and EGN-3E with North Side of SR 526 Design Option.
- **Evergreen Cemetery (4504 Broadway):** Alternatives EVT-1A, EVT-2C, and EVT-3D.

The SHPO will be notified of FTA's intent to make a *de minimis* impact determination for these properties. If SHPO requires any minimization or enhancement measures for *de minimis* impacts beyond those described in Section 6, those will be discussed in the Final EIS.

8 SECTION 4(F) COORDINATION

Table H8-1 lists the coordination meetings conducted to date regarding Section 4(f) properties. Table H8-2 lists the concurrence requests sent by Sound Transit to OWJs. Copies of the concurrence requests are included in Attachment A.

Table H8-1 Section 4(f) Consultation Summary

Date	Format	Participants	General Topic(s)
July 23, 2024	Meeting	Sound Transit, City of Everett	Applicability of Section 4(f) to James J. Hill Park
September 11, 2024	Meeting	Sound Transit, City of Everett	Applicability of Section 4(f) to James J. Hill Park
June 13, 2025	Letter	From: Sound Transit To: SHPO	Consultation on NRHP eligibility
July 22, 2025	Letter	From: SHPO To: Sound Transit	Concurrence on NRHP eligibility for all but one of the built environment resources recommended eligible
October 1, 2025	Letter	From: FTA To: SHPO	Initiation of Section 106; consultation on APE and adverse effects on two properties (4111 Alderwood Mall Boulevard and 2316 47th Street SE)
October 15, 2025	Letter	From: SHPO To: FTA	Concurrence on NRHP eligibility and that the project will have an adverse effect on two properties (4111 Alderwood Mall Boulevard and 2316 47th Street SE)

Date	Format	Participants	General Topic(s)
May 8, 2026	Meeting	Sound Transit, City of Lynnwood	Potential impacts to the Interurban Trail within the city of Lynnwood may meet the temporary occupancy exception criteria in 23 CFR 774.13(d)
May 19, 2026	Meeting	Sound Transit, Snohomish County	Potential impacts to the Interurban Trail within unincorporated Snohomish County may meet the temporary occupancy exception criteria in 23 CFR 774.13(d)

Table H8-2 Section 4(f) Concurrences Requested

Concurrence Item	Agency	Date Requested	Date Received
James J. Hill Park lacks local significance and is exempt from Section 4(f) protection	City of Everett	March 20, 2025	March 21, 2025
Potential impacts to the Interurban Trail within the city of Lynnwood meet the temporary occupancy exception criteria in 23 CFR 774.13(d) and are not considered a use under Section 4(f)	City of Lynnwood	May 11, 2026	June 1, 2026
Potential impacts to the Interurban Trail within unincorporated Snohomish County meet the temporary occupancy exception criteria in 23 CFR 774.13(d) and are not considered a use under Section 4(f)	Snohomish County	May 19, 2026	June 3, 2026

9 LEAST OVERALL HARM ANALYSIS

When there is no feasible and prudent avoidance alternative, FTA may approve only the alternatives that minimize impacts and cause the least overall harm based on an assessment of the seven factors listed in 23 CFR 774.3(c)(1):

- The ability of the alternative to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property).
- The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection.
- The relative significance of each Section 4(f) property.
- The views of the OWJ over each Section 4(f) property.
- The degree to which each alternative meets the purpose and need for the project.

- After reasonable mitigation, the magnitude of any adverse impacts to properties not protected by Section 4(f).
- Substantial differences in costs among alternatives.

Following public review of and comment on the Draft EIS and this Draft Section 4(f) Evaluation, FTA and Sound Transit will review all comments regarding the analysis and preliminary determinations. If the agencies determine that a feasible and prudent avoidance alternative does not exist, and multiple alternatives remain that result in a Section 4(f) use, the agencies will conduct a Least Overall Harm Analysis and include it in the Final Section 4(f) Evaluation, which will be prepared in conjunction with the Final EIS for this project.

10 PRELIMINARY DETERMINATION OF SECTION 4(F) USE

Based on the above analysis, FTA has made preliminary Section 4(f) determinations for the Interurban Trail for each Build Alternative, summarized in Table H10-1. No Section 4(f) parks or recreational areas would be used by any of the Build Alternatives.

Table H10-1 Summary of Preliminary Section 4(f) Uses of Interurban Trail

Segment	Build Alternative	Preliminary Use Determination
West Alderwood	ALD-1B	No use (temporary occupancy)
	ALD-1B with Alderwood Mall Boulevard Design Option	No use (temporary occupancy)
	ALD-2D	No use (temporary occupancy)
	ALD-2D with Alderwood Mall Boulevard Design Option	No use (temporary occupancy)
	ALD-2F	No use (temporary occupancy)
	ALD-2F with Alderwood Mall Boulevard Design Option	No use (temporary occupancy)
Ash Way	ASH-1A	No use (not subject to Section 4(f) approval)
	ASH-2D	No use (temporary occupancy)
SR 526/ Evergreen	EGN-1A	No use (not subject to Section 4(f) approval)
	EGN-2B	No use (not subject to Section 4(f) approval)
	EGN-2B with North Side of SR 526 Design Option	No use (not subject to Section 4(f) approval)
	EGN-3E	No use (not subject to Section 4(f) approval)
	EGN-3E with North Side of SR 526 Design Option	No use (not subject to Section 4(f) approval)
Broadway/ I-5	BI-1	No use
	BI-2	No use

Based on the above analysis, FTA has also made preliminary Section 4(f) determinations for historic properties, summarized in Table H10-2. Totaled across all the Build Alternatives, there would be a use of 23 historic properties and five *de minimis* impacts.

Table H10-2 Summary of Preliminary Section 4(f) Uses of Historic Properties

Historic Property	Build Alternative(s)	Preliminary Section 4(f) Use
West Alderwood Segment		
Ken Schoenfeld Furniture (19909 40th Avenue W)	All alternatives	No use (temporary occupancy)
Pacific First Federal Savings and Loan (3220 188th Street SW)	ALD-1B, ALD-1B with Alderwood Mall Boulevard Design Option	No use (temporary occupancy)
	ALD-2D, ALD-2D with Alderwood Mall Boulevard Design Option, ALD-2F, ALD-2F with Alderwood Mall Boulevard Design Option	Use
Pioneer First Federal Savings and Loan Association (4111 Alderwood Mall Blvd)	All alternatives	Use
Ash Way Segment		
House (1204 Darben Place)	All alternatives	No use
Mariner Segment		
Western Six Motel (224 128th Street SW)	MAR-1B, MAR-1B with Surface Parking Design Option, MAR-2D	No use (temporary occupancy)
	MAR-2D with Surface Parking Design Option	No use
SR 99/Airport Road Segment		
Service Station (2210 112th Street SW)	AIR-1A	No use
	AIR-2B	<i>De minimis</i> impact
SW Everett Industrial Center Segment		
General Telephone Company Facility (2403 W Casino Road)	All alternatives	<i>De minimis</i> impact
SR 526/Evergreen Segment		
Bank Building (8500 Evergreen Way)	EGN-1A	No use
	EGN-2B, EGN-2B with North Side of SR 526 Design Option, EGN-3E, EGN-3E with North Side of SR 526 Design Option	<i>De minimis</i> impact
General Telephone Company (426 E Casino Road)	EGN-1A, EGN-2B, EGN-2B with North Side of SR 526 Design Option	No use
	EGN-3E, EGN-3E with North Side of SR 526 Design Option	Use
House (1322 Ballew Avenue)	All alternatives	<i>De minimis</i> impact

Historic Property	Build Alternative(s)	Preliminary Section 4(f) Use
House (8102 W Glen Drive)	EGN-1A	Use
	EGN-2B, EGN-2B with North Side of SR 526 Design Option, EGN-3E, EGN-3E with North Side of SR 526 Design Option	No use
Broadway/I-5 Segment		
House (5529 Commercial Avenue)	BI-1	No use
	BI-2	Use
House (2118 Jefferson Place)	BI-1	No use
	BI-2	Use
House (7404 McDougall Avenue)	All alternatives	No use
House (8105 Spokane Drive)	BI-1	No use
	BI-2	No use (temporary occupancy)
House (5531 S 3rd Avenue)	BI-1	No use (temporary occupancy)
	BI-2	No use
Lexington Arms Apartments (2508 Lexington Avenue)	BI-1	Use
	BI-2	No use
Everett Station Segment		
Callahan Plumbing and Heating, Building 1 (3211 Broadway)	EVT-1A	No use
	EVT-2C, EVT-3D	Use
Everett Bottling Works (3231 Broadway)	EVT-1A	No use
	EVT-2C, EVT-3D	Use
Evergreen Cemetery (4505 Broadway)	All alternatives	<i>De minimis</i> impact
House (3224 Broadway)	EVT-1A	No use
	EVT-2C, EVT-3D	No use (temporary occupancy)
House (2316 47th Street SE)	All alternatives	Use
Milwaukee Road – Everett Depot (3201 McDougall Avenue)	EVT-1A, EVT-2C	Use
	EVT-3D	No use (temporary occupancy)
Warehouse (3008 McDougall Avenue)	EVT-1A, EVT-2C	No use
	EVT-3D	Use
Washington Stove Works (3402 Smith Avenue)	EVT-1A	No use (temporary occupancy)
	EVT-2C, EVT-3D	No use
OMF North Site Alternatives		
Duplex, Building 1 (12221 Alexander Road)	OMF Site F, OMF Site F with Lead Tracks to the West Side of Airport Road Design Option	Use
Duplex, Building 2 (12221 Alexander Road)		Use
Duplex, Building 3 (12221 Alexander Road)		Use

Historic Property	Build Alternative(s)	Preliminary Section 4(f) Use
Duplex, Building 4 (12221 Alexander Road)		Use
Duplex, Building 1 (12227 Alexander Road)		Use
Duplex, Building 2 (12227 Alexander Road)		Use
Duplex, Building 3 (12227 Alexander Road)		Use
House, Building A (12217 Alexander Road)		Use
House, Building B (12217 Alexander Road)		Use
House, Building C (12217 Alexander Road)		Use
Empire Industrial Park, Building C (12414 Highway 99)		Use

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Everett Link Extension

ATTACHMENT A

Section 4(f) Coordination

Haase, Rachel

From: Bob Leonard <BLEonard@everettwa.gov>
Sent: Friday, March 21, 2025 12:23 PM
To: Widstrand, Eric
Cc: Russell, Martha; Haase, Rachel; Rehmat, Hussein; Yorik Stevens-Wajda
Subject: RE: [EXTERNAL] Park Concurrence for Everett Link

Categories: External

Category 2: Sensitive information

The City concurs with this assessment.



Bob Leonard
Director | Parks and Facilities
425.257.8335 | 802 E. Mukilteo Blvd, Everett, WA 98203
everettwa.gov | [Facebook](https://www.facebook.com/everettwa) | [Twitter](https://twitter.com/everettwa)

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Category 2: For official use only / disclosure permissible by law.

From: Widstrand, Eric <eric.widstrand@soundtransit.org>
Sent: Thursday, March 20, 2025 2:29 PM
To: Bob Leonard <BLEonard@everettwa.gov>
Cc: Russell, Martha <Martha.Russell@soundtransit.org>; Haase, Rachel <rachel.haase@kimley-horn.com>; Rehmat, Hussein <hussein.rehmat@soundtransit.org>; Yorik Stevens-Wajda <YStevens@everettwa.gov>
Subject: [EXTERNAL] Park Concurrence for Everett Link

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.

Hi Bob,

As discussed with the City of Everett on July 23, 2024 and September 11, 2024, Sound Transit is requesting concurrence from the City that James J. Hill Park is not a public park of national, state, or local significance, and, therefore, Section 4(f) does not apply. The term significant means that in comparing the availability and function of the park, recreation area, or wildlife and waterfowl refuge with the park, recreation, or refuge objectives of the agency, community, or authority, the property in question plays an important role in meeting those objectives. While James J. Hill Park is a city park and potential impacts to this park and mitigation for impacts will be included in the Draft EIS, Sound Transit believes that the park lacks local significance and is exempt from Section 4(f) protection.

Thank you,
Eric

Eric Widstrand, PE
Project Planning Director – Everett Link Extension
Capital Delivery Department
Sound Transit
M 206.650.8681



May 11, 2026

Joel Faber, Director
Parks, Recreation, and Cultural Arts
City of Lynnwood
19100 44th Avenue W
Lynnwood, WA 98036

Subject: Everett Link Extension Project Section 4(f) Concurrence Request

Dear Mr. Faber:

As part of the Everett Link Extension (EVLE) Draft Environmental Impact Statement (EIS) documentation process, Sound Transit and the Federal Transit Administration (FTA), as the lead federal agency, are evaluating the potential impacts of the project on public parks and recreational facilities, wildlife/waterfowl refuges, and historic resources with regards to Section 4(f) of the Department of Transportation Act of 1966. Sound Transit is working with the FTA to prepare a draft Section 4(f) Evaluation that describes the impacts of the project on these resources. The Section 4(f) Evaluation will be included in the Draft EIS and is expected to be distributed to the public, Tribes, and agencies for comment in fall 2026.

Potential impacts to the Interurban Trail are included in that evaluation. All Build Alternatives that we are analyzing in the city of Lynnwood include an elevated light rail guideway adjacent to, over, and crossing the trail; relocation of approximately 250 feet of the trail; and/or temporary construction impacts. **Table 1** below summarizes the project elements in relation to the Interurban Trail, including potential impacts. **Figure 1** shows the Interurban Trail within the city of Lynnwood. Relevant plan sheets for Alternatives ALD-1B, ALD-2D, and ALD-2F are included as **Attachment 1**, while relevant plan sheets for Alternatives ALD-1B, ALD-2D, and ALD-2F with the Alderwood Mall Boulevard Design Option are included as **Attachment 2**.

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CHIEF EXECUTIVE OFFICER

Dow Constantine

Table 1: Description of Project Elements in Relation to the Interurban Trail in Lynnwood

	Alternatives ALD-1B, ALD-2D, and ALD-2F	Alternatives ALD-1B, ALD-2D, and ALD-2F with the Alderwood Mall Boulevard Design Option
Elevated guideway crossing over the Interurban Trail near 40th Avenue W	X	X
Guideway adjacent to the Interurban Trail on the south side between 40th Avenue W and 33rd Avenue W	X	
Guideway adjacent to the Interurban Trail on the south side between 40th Avenue W and 36th Avenue W		X
Elevated guideway crossing over the Interurban Trail near 33rd Avenue W	X	
Elevated guideway crossing over the Interurban Trail near 36th Avenue W		X
Relocation of 250 linear feet of Interurban Trail directly north of current position to accommodate a hi-rail access road; Interurban Trail would remain on Snohomish County Public Utility District property	X	
Relocation of 250 linear feet of Interurban Trail directly north of current position to accommodate the guideway; Interurban Trail would remain on Snohomish County Public Utility District property		X

In addition to the impacts described in **Table 1**, all West Alderwood alternatives would require temporary construction easements that would impact the Interurban Trail; however, detours would be provided to bypass any temporarily closed areas. The guideway would change the visual setting and result in an increase in noise and vibration for portions of the trail. However, these proximity impacts would not substantially impair the activities, features, and attributes of the trail. Any areas of the trail that are disturbed would be restored to existing conditions or better or replaced, in coordination with the City of Lynnwood.

A temporary use occurs when the project temporarily occupies any portion of a Section 4(f) resource (typically during construction) and substantially impairs the property. However, if all the conditions from 23 CFR 774.13(d) listed below are met, a temporary occupancy is not considered a use under Section 4(f):

- The duration of use would be temporary (i.e., less than the time needed for construction of the project), and there would be no change in ownership of land.
- The scope of work would be minor (i.e., both the nature and magnitude of the changes to the Section 4(f) resource would be minimal).
- There would be no anticipated permanent adverse physical impacts, nor would there be interference with the protected activities, features or attributes of the resource, on either a temporary or permanent basis.
- The land being used would be fully restored to a condition that is at least as good as that which existed before the project.

- There is documented agreement of the official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions.

Sound Transit believes that the potential impacts to the Interurban Trail within the city of Lynnwood may meet the temporary occupancy exception criteria listed above. To meet the last criterion, we ask that you provide your concurrence that the conditions from 23 CFR 774.13(d) listed above are met by returning this letter with your signature below.

Sound Transit appreciates the City of Lynnwood's continued coordination on the Interurban Trail property. We are requesting a response to this request within 30 days in order to incorporate the City's response in the Draft EIS. Please contact me at 206-650-8681 or eric.widstrand@soundtransit.org if you have any questions.

Sincerely,

Eric Widstrand

Eric Widstrand
EVLE Project Planning Director
eric.widstrand@soundtransit.org
206-650-8681

Joel Faber
Joel Faber (Jun 1, 2026 15:21:00 PDT)

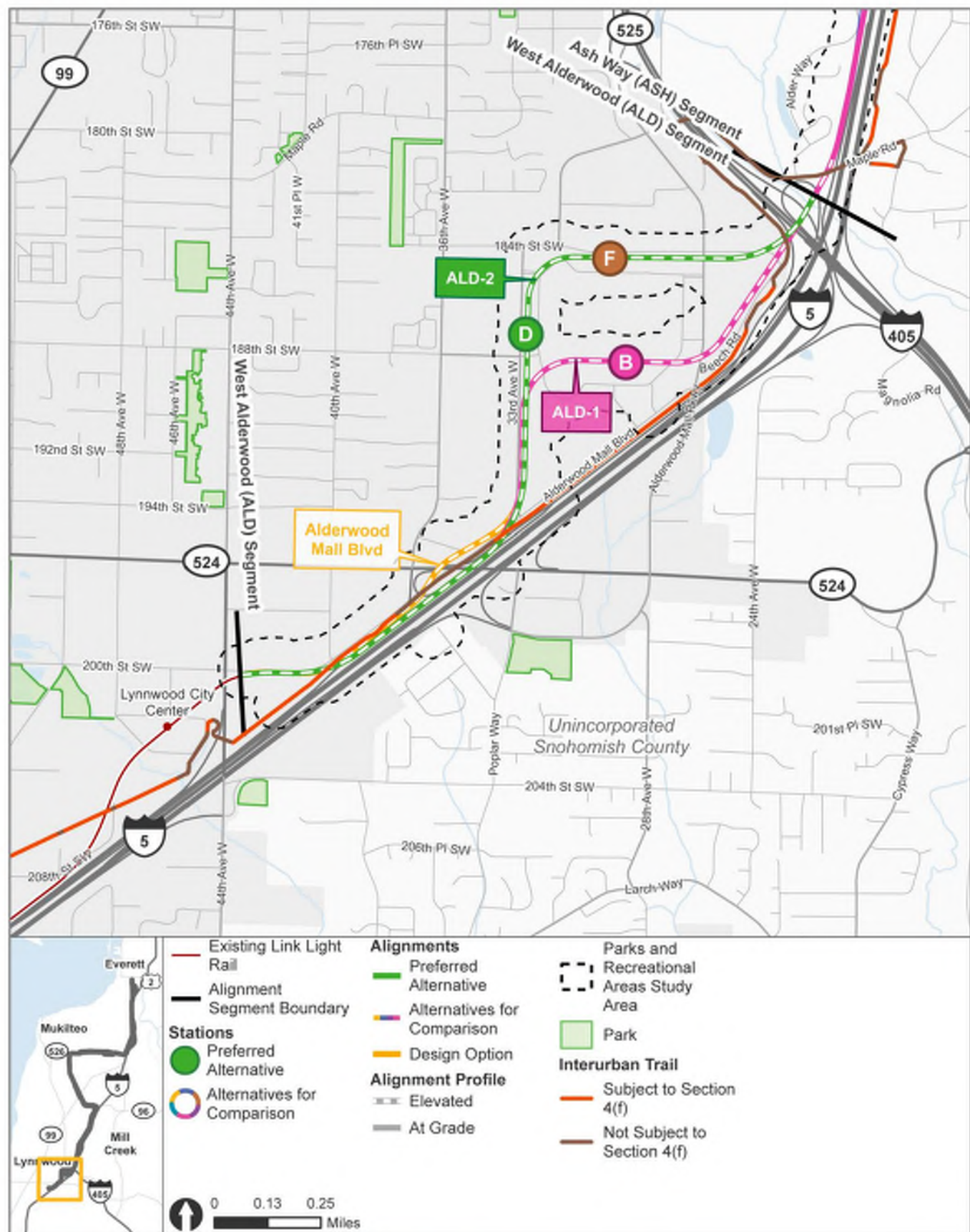
06/01/26

Joel Faber, Director of Parks, Recreation, and Cultural Arts
Concurrence

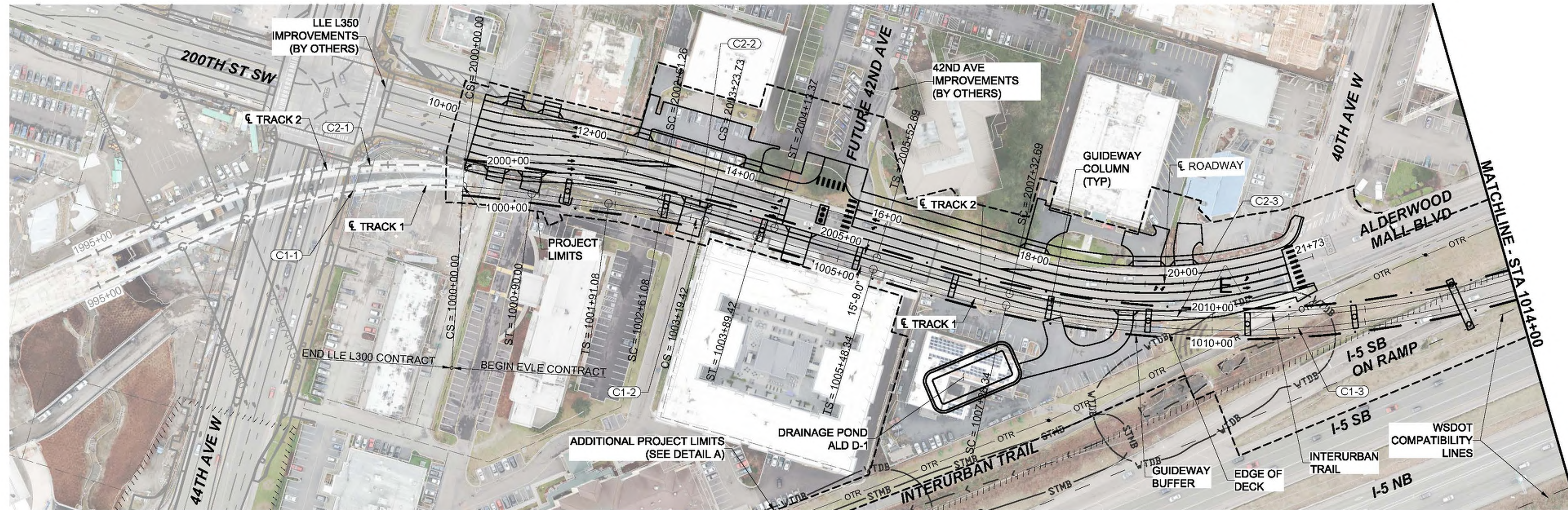
Date

cc: Todd Tillenger, FTA
Terence Plaskon, FTA
Galeeb Kachra, North Corridor Environmental Manager
Hussein Rehmat, Senior Environmental Planner

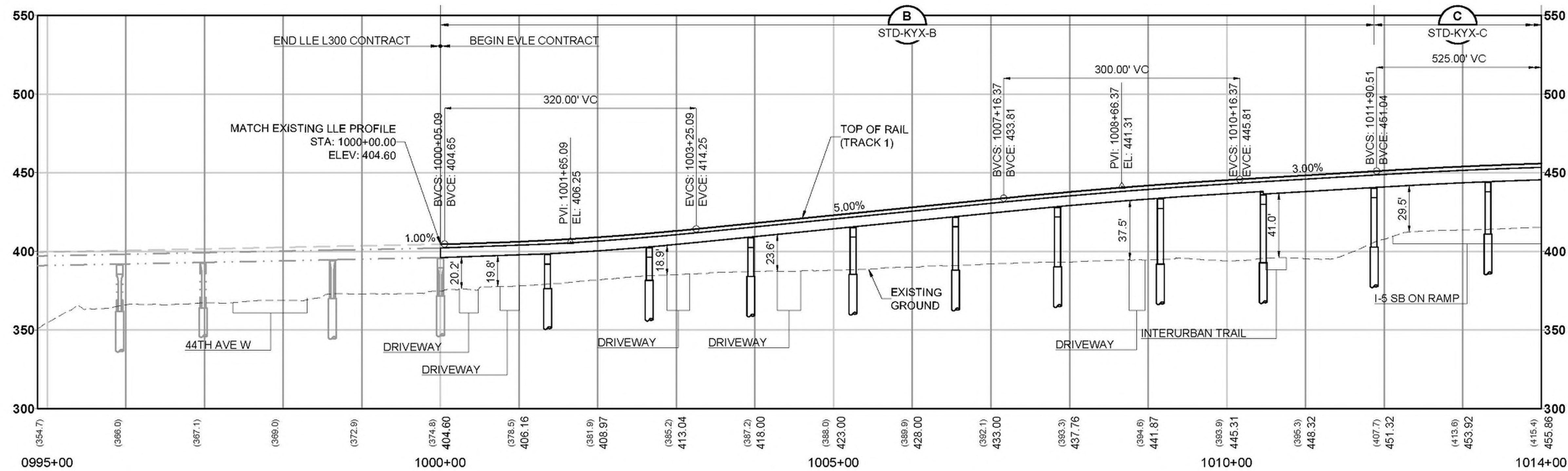
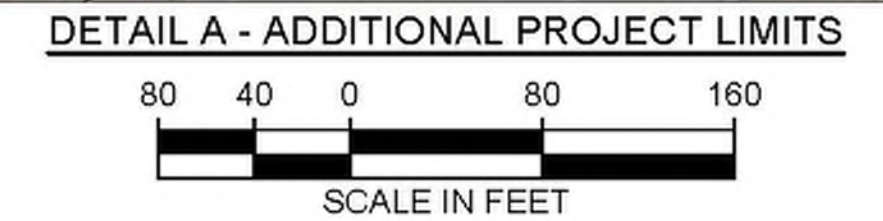
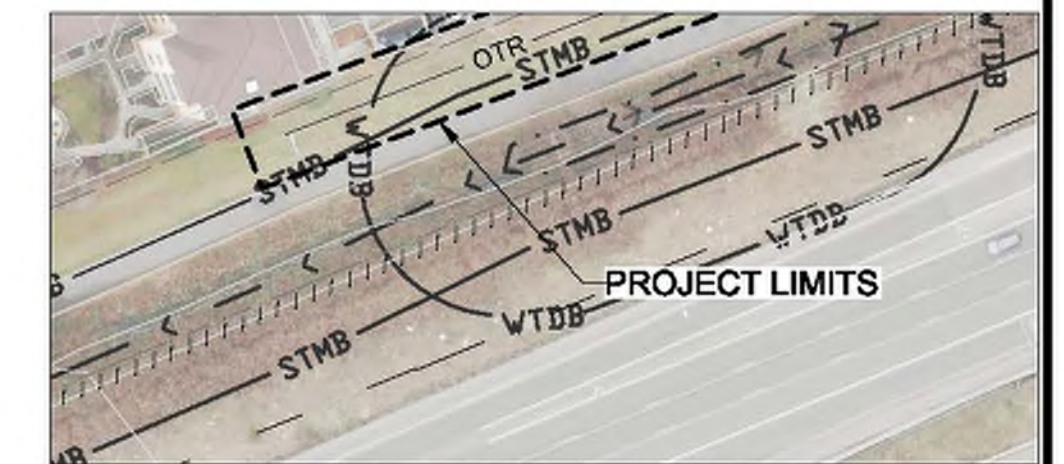
Figure 1: Interurban Trail Within the West Alderwood Segment



Attachment 1

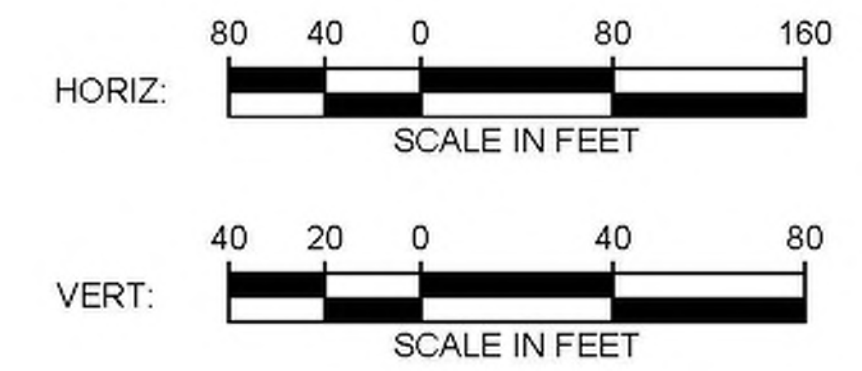


- NOTES:
1. SEE STD SHEETS FOR NOTES, LEGEND, AND ABBREVIATIONS.
 2. ELECTRIC OVERHEAD TRANSMISSION LINE RELOCATIONS DUE TO PROPOSED CONSTRUCTION CONFLICTS ARE SHOWN FOR CONTEXT.
 3. SEE SHEET L05-CRV101 FOR ROADWAY PLAN AND PROFILE.
 4. FOR ROADWAY TYPICAL SECTION SEE SHEET STD-CRY101.



CURVE TABLE							
CURVE	RADIUS (FT)	Lc (FT)	Ls1 (FT)	Ls2 (FT)	Ea (IN)	Eu (IN)	V (MPH)
C1-1	675.0	289.5	90.0	90.0	2.75	2.53	30
C1-2	820.0	58.3	70.0	70.0	2.25	2.10	30
C1-3	1350.0	735.0	180.0	180.0	4.25	3.08	50
C2-1	665.0	326.5	90.0	261.3	2.75	2.61	30
C2-2	920.0	62.5	261.3	89.6	1.75	2.12	30
C2-3	1334.3	724.3	180.0	180.0	4.25	3.17	50

NOTE:
CURVES C1-1 & C2-1 ARE EXISTING LLE L300 CURVES. EVLE WILL ONLY ADJUST THE SUPERELEVATION OF THESE CURVES.



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Kimley»Horn

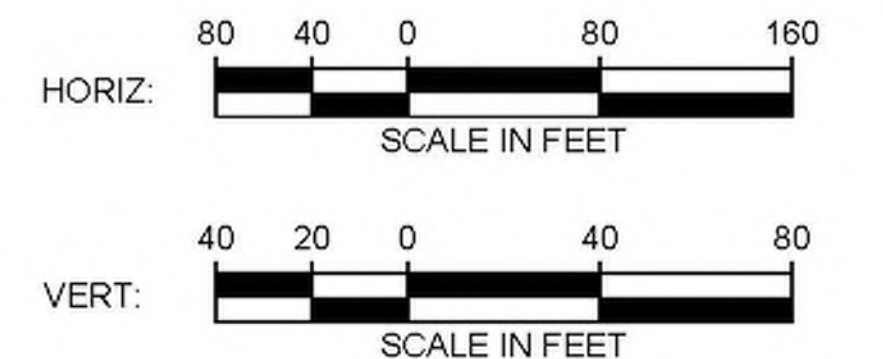
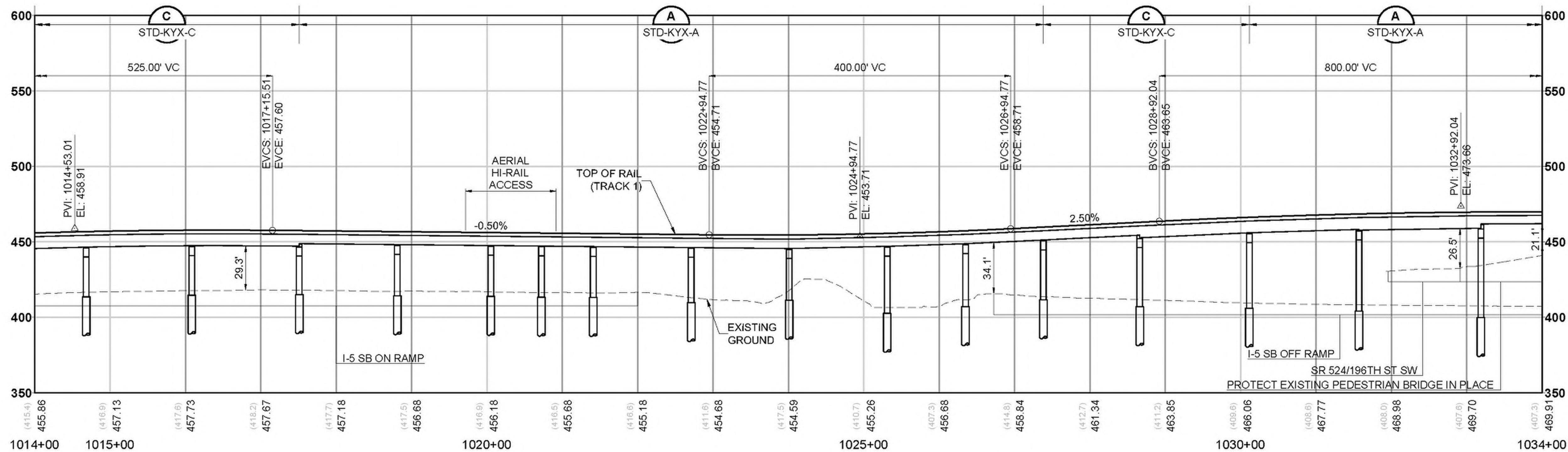
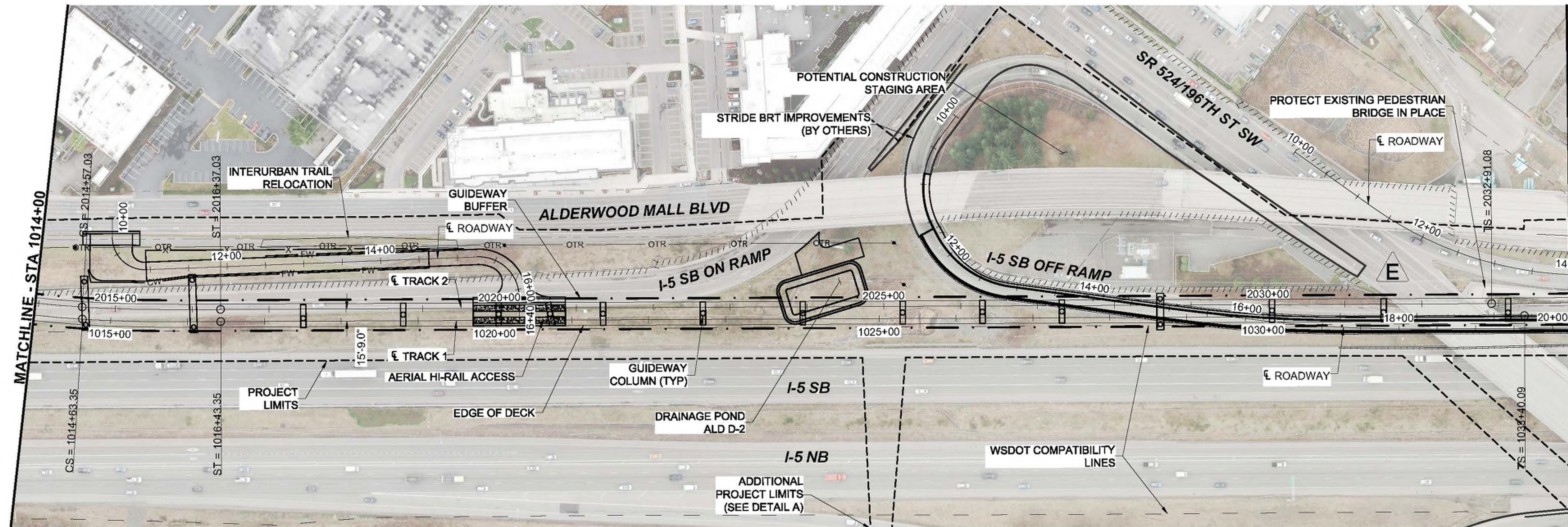
EVERETT LINK EXTENSION AND OMF NORTH

DRAFT EIS - CONCEPTUAL DESIGN
L05 SEGMENT
EVERETT LINK EXTENSION & OMF NORTH
ALD-2D
GENERAL SITE PLANS

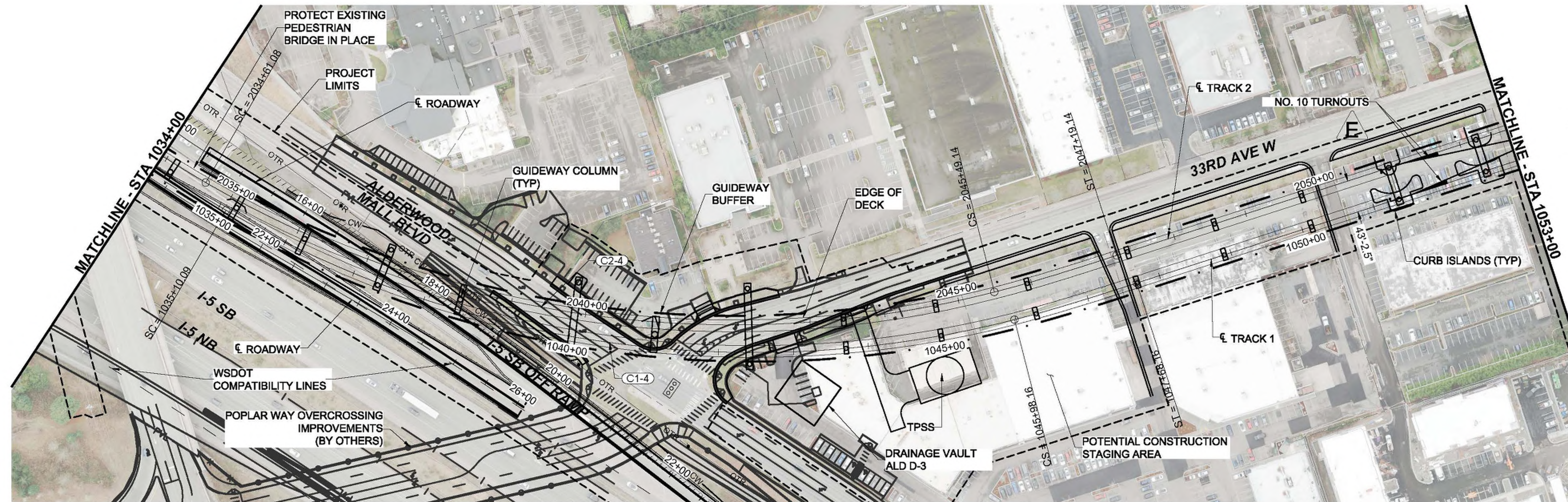
L05-GSP101
SHEET 68 OF 387
02/14/2025



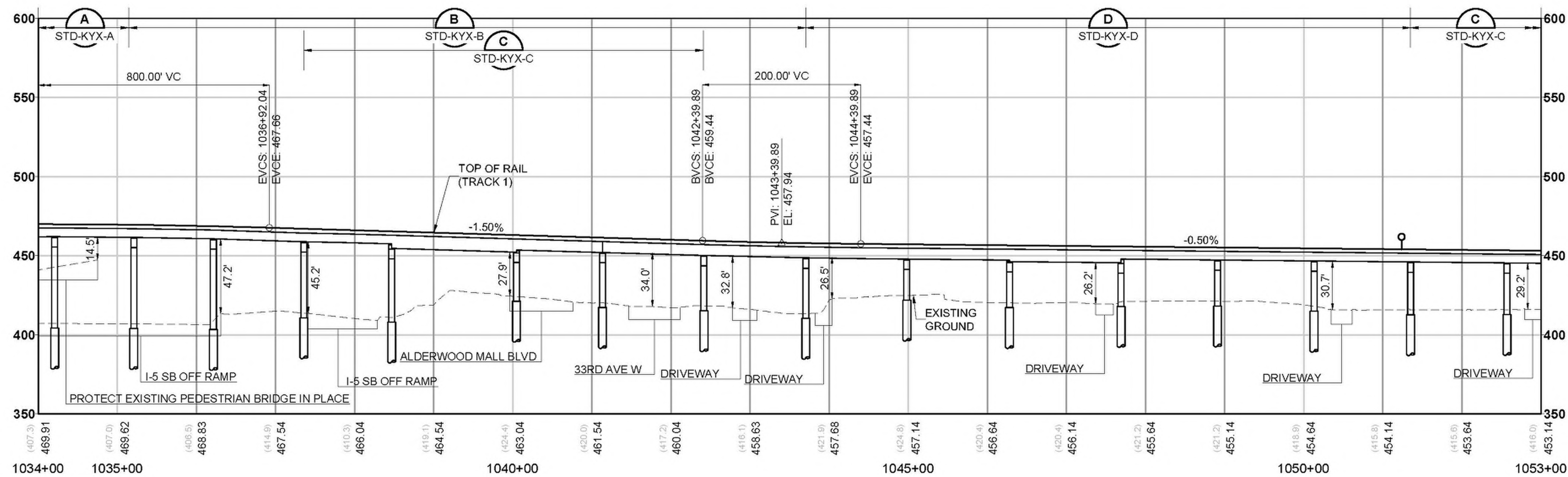
- NOTES:
1. SEE STD SHEETS FOR NOTES, LEGEND, AND ABBREVIATIONS.
 2. ELECTRIC OVERHEAD TRANSMISSION LINE RELOCATIONS DUE TO PROPOSED CONSTRUCTION CONFLICTS ARE SHOWN FOR CONTEXT.
 3. SEE SHEET L05-CRV102 AND L05-CRV103 FOR ROADWAY PLANS AND PROFILES.
 4. FOR ROADWAY TYPICAL SECTION SEE SHEETS STD-CRY101 AND STD-CRY102.



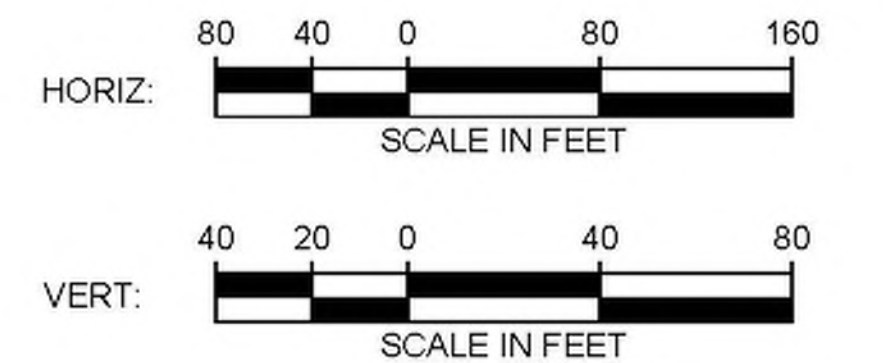
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- NOTES:
1. SEE STD SHEETS FOR NOTES, LEGEND, AND ABBREVIATIONS.
 2. ELECTRIC OVERHEAD TRANSMISSION LINE RELOCATIONS DUE TO PROPOSED CONSTRUCTION CONFLICTS ARE SHOWN FOR CONTEXT.
 3. SEE SHEET L05-CRV103 AND L05-CRV104 FOR ROADWAY PLANS AND PROFILES.
 4. FOR ROADWAY TYPICAL SECTION SEE SHEETS STD-CRY102 AND STD-CRY103.



CURVE TABLE						
CURVE	RADIUS (FT)	Lc (FT)	Ls1 (FT)	Ls2 (FT)	Ea (IN)	Eu (IN)
C1-4	1400.0	1088.1	170.0	170.0	4.00	3.07
C2-4	1400.0	1088.1	170.0	170.0	4.00	3.07



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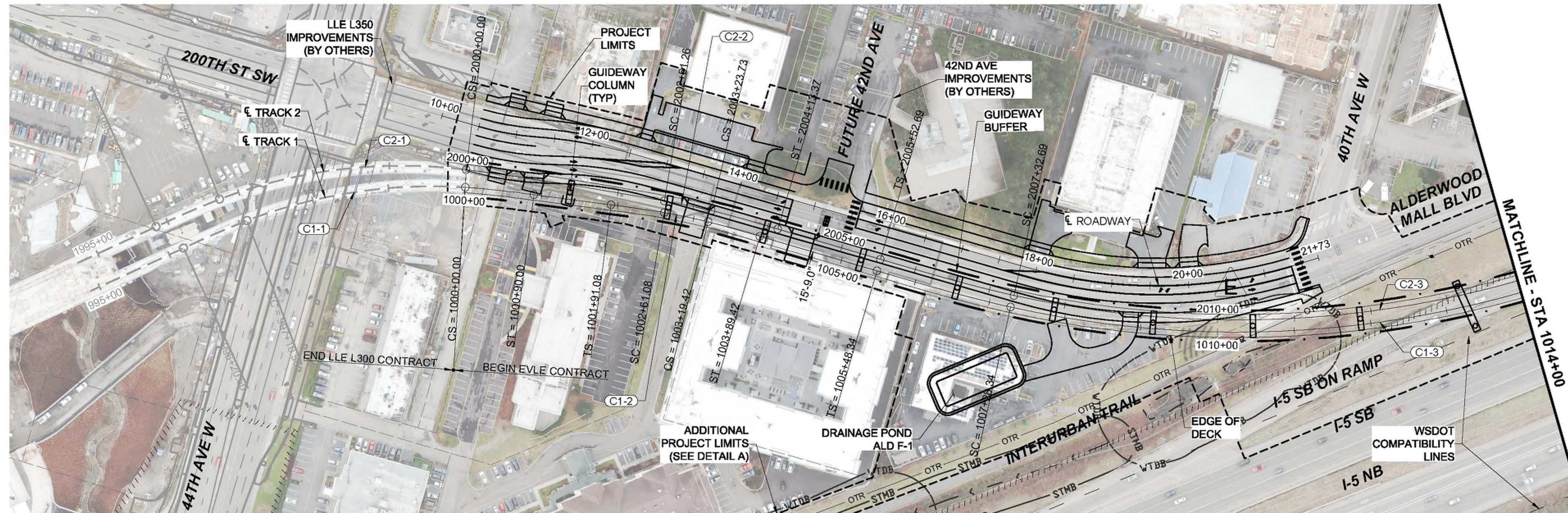


Kimley»Horn

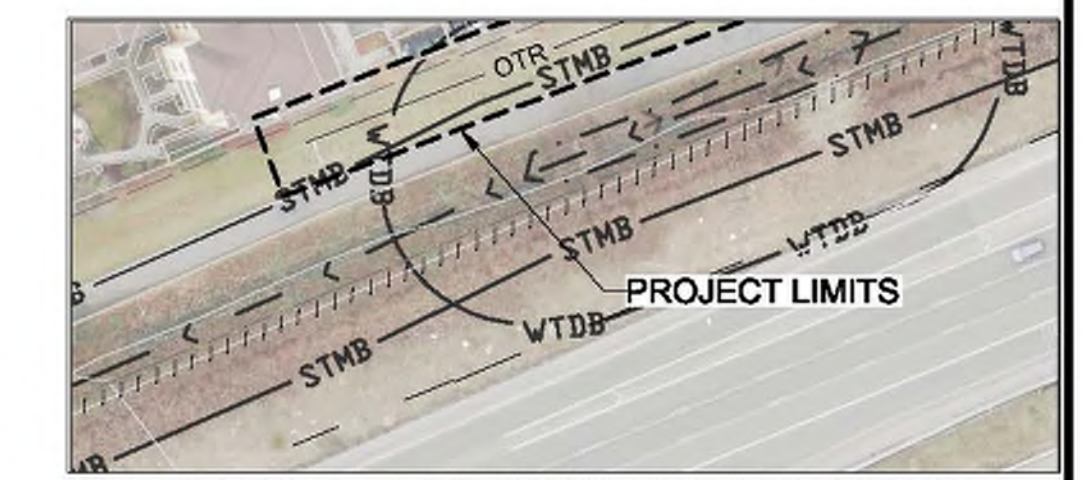
EVERETT LINK EXTENSION AND OMF NORTH

DRAFT EIS - CONCEPTUAL DESIGN
L05 SEGMENT
EVERETT LINK EXTENSION & OMF NORTH
ALD-2D
GENERAL SITE PLANS

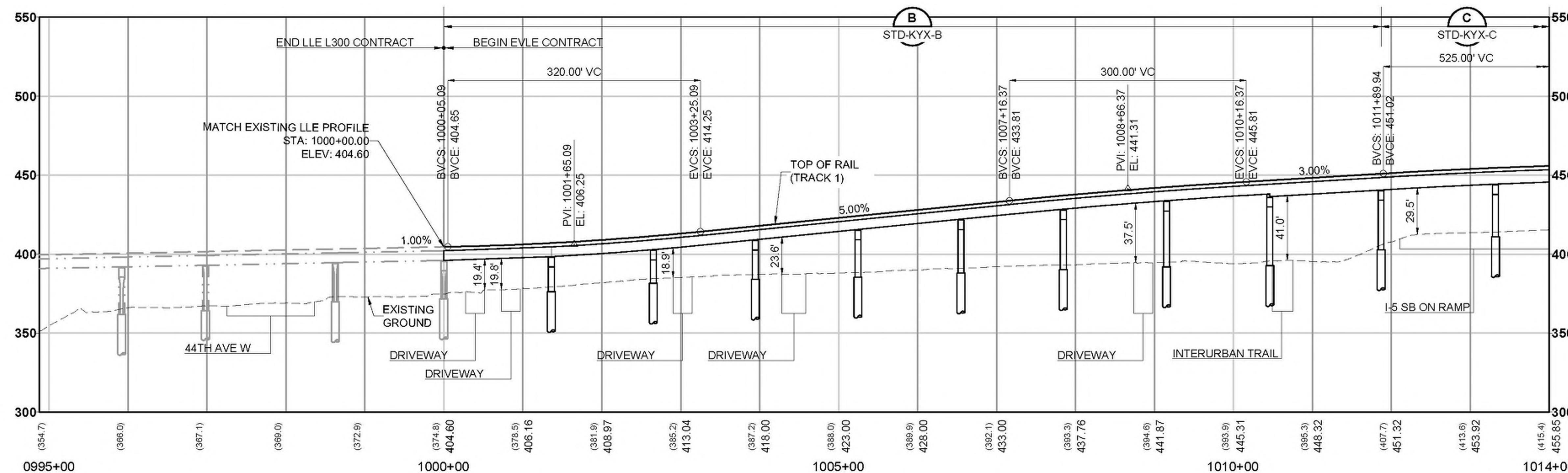
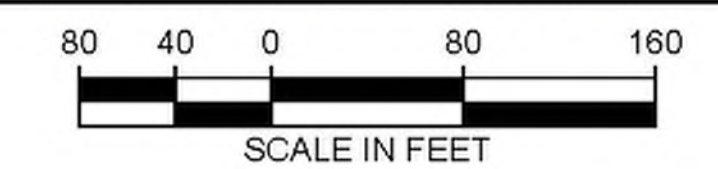
L05-GSP103
SHEET 70 OF 387
02/14/2025



- NOTES:
1. SEE STD SHEETS FOR NOTES, LEGEND, AND ABBREVIATIONS.
 2. ELECTRIC OVERHEAD TRANSMISSION LINE RELOCATION DUE TO PROPOSED CONSTRUCTION CONFLICTS ARE SHOWN FOR CONTEXT.
 3. SEE SHEET L05-CRV-201 FOR ROADWAY PLAN AND PROFILE.
 4. FOR ROADWAY TYPICAL SECTION SEE SHEET STD-CRY101.

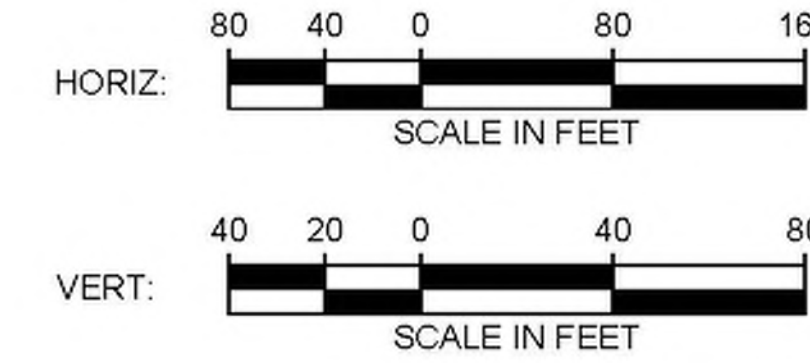


DETAIL A - ADDITIONAL PROJECT LIMITS

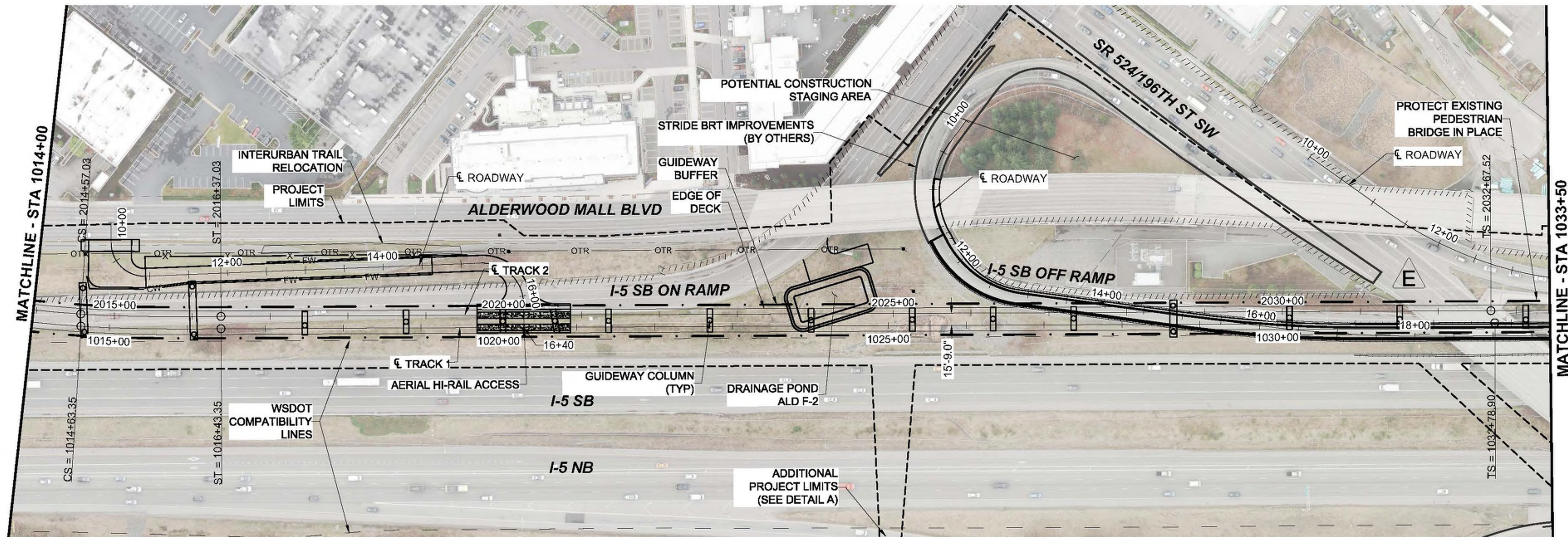


CURVE TABLE							
CURVE	RADIUS (FT)	Lc (FT)	Ls1 (FT)	Ls2 (FT)	Ea (IN)	Eu (IN)	V (MPH)
C1-1	675.0	289.5	90.0	90.0	2.75	2.53	30
C1-2	820.0	58.3	70.0	70.0	2.25	2.10	30
C1-3	1350.0	735.0	180.0	180.0	4.25	3.08	50
C2-1	665.0	326.5	90.0	261.3	2.75	2.61	30
C2-2	920.0	62.5	261.3	89.6	1.50	2.37	30
C2-3	1334.3	724.3	180.0	180.0	4.25	3.17	50

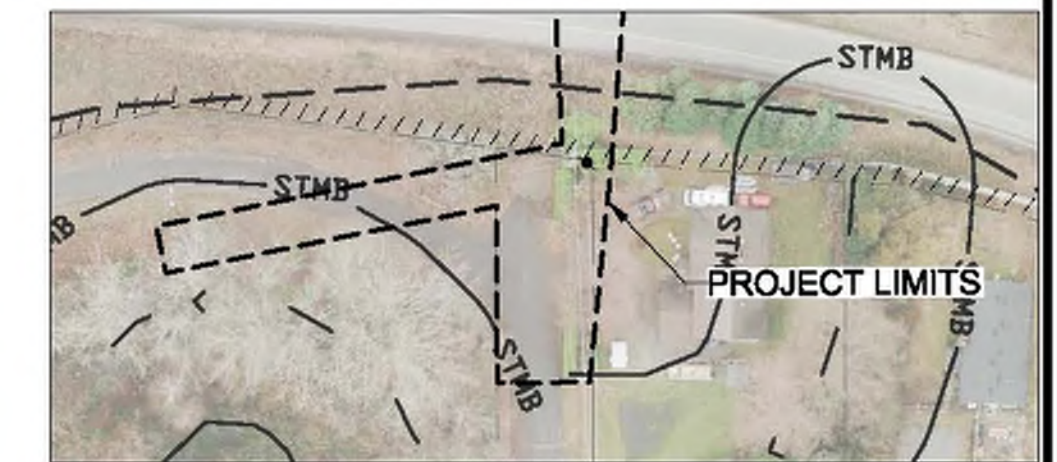
NOTE:
CURVES C1-1 & C2-1 ARE EXISTING LLE L300 CURVES. EVLE WILL ONLY ADJUST THE SUPERELEVATION OF THESE CURVES.



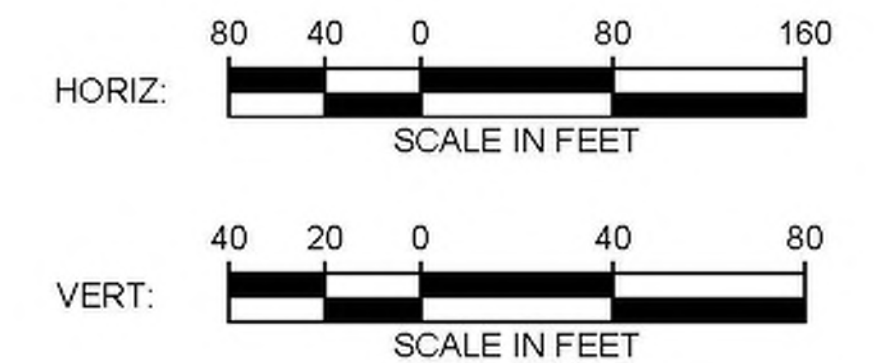
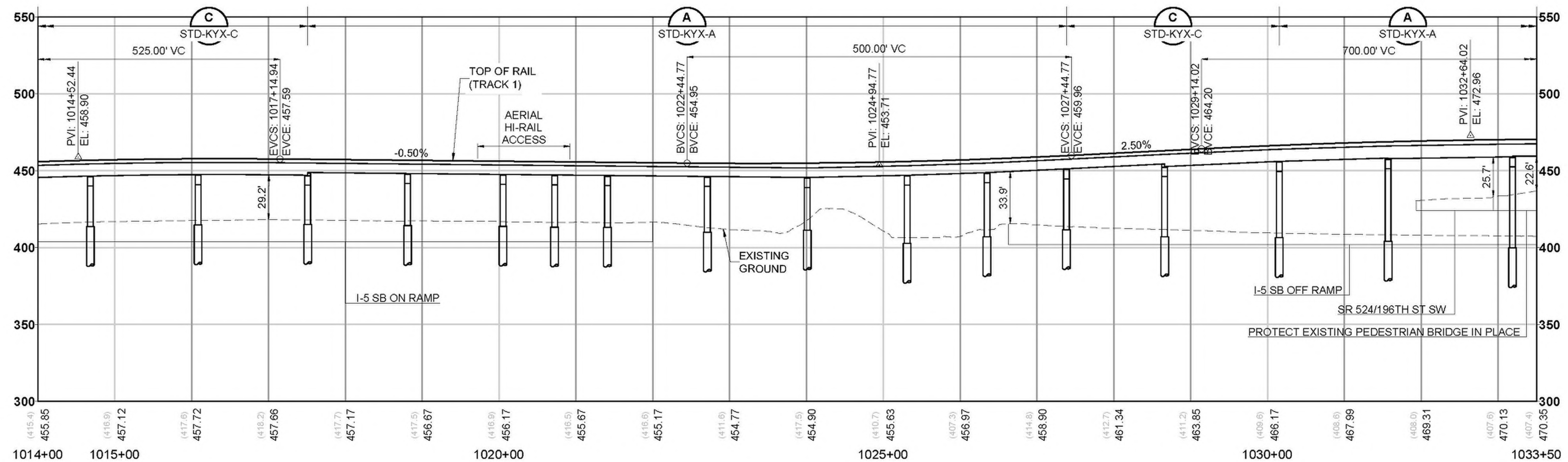
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- NOTES:
1. SEE STD SHEETS FOR NOTES, LEGEND, AND ABBREVIATIONS.
 2. ELECTRIC OVERHEAD TRANSMISSION LINE RELOCATION DUE TO PROPOSED CONSTRUCTION CONFLICTS ARE SHOWN FOR CONTEXT.
 3. SEE SHEET L05-CRV202 AND L05-CRV203 FOR ROADWAY PLANS AND PROFILES.
 4. FOR ROADWAY TYPICAL SECTION SEE SHEETS STD-CRY101 AND STD-CRY102.



DETAIL A - ADDITIONAL PROJECT LIMITS

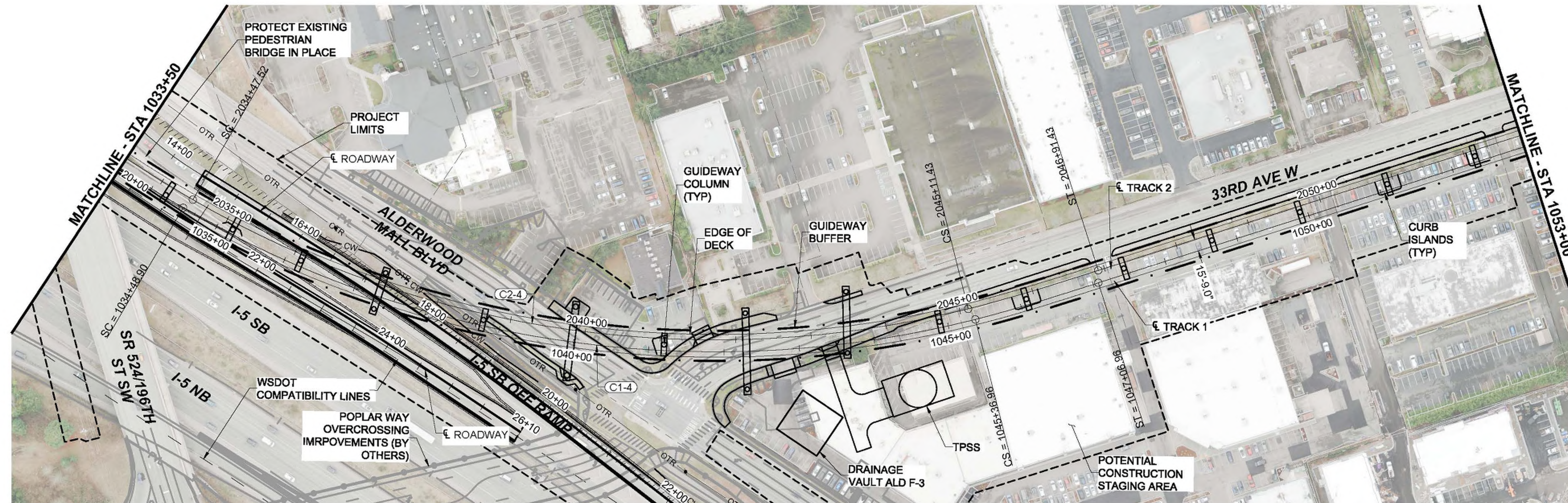


Kimley»Horn

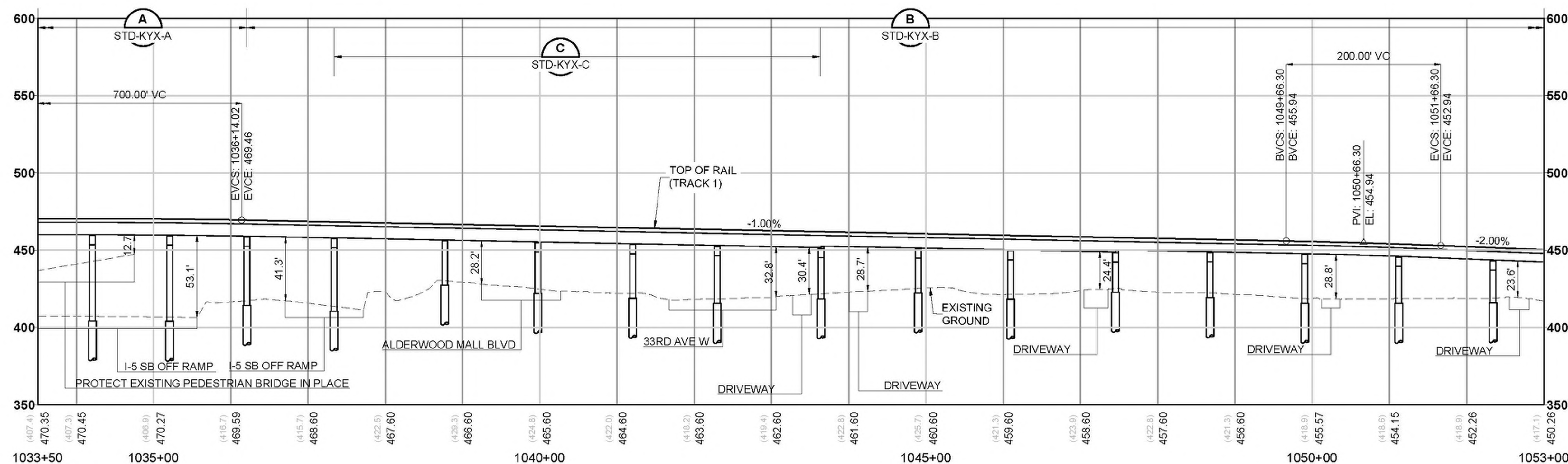
EVERETT LINK EXTENSION AND OMF NORTH

DRAFT EIS - CONCEPTUAL DESIGN
L05 SEGMENT
EVERETT LINK EXTENSION & OMF NORTH
ALD-2F
GENERAL SITE PLANS

L05-GSP202
SHEET 84 OF 387
02/14/2025



- NOTES:
1. SEE STD SHEETS FOR NOTES, LEGEND, AND ABBREVIATIONS.
 2. ELECTRIC OVERHEAD TRANSMISSION LINE RELOCATION DUE TO PROPOSED CONSTRUCTION CONFLICTS ARE SHOWN FOR CONTEXT.
 3. SEE SHEET L05-CRV203 AND L05-CRV204 FOR ROADWAY PLANS AND PROFILES.
 4. FOR ROADWAY TYPICAL SECTION SEE SHEETS STD-CRY102 AND STD-CRY103.



CURVE	RADIUS (FT)	Lc (FT)	Ls1 (FT)	Ls2 (FT)	Ea (IN)	Eu (IN)	V (MPH)
C1-4	1400.0	1088.1	170.0	170.0	4.00	3.07	50
C2-4	1384.3	1063.9	180.0	180.0	4.00	3.15	50



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Kimley»Horn

EVERETT LINK EXTENSION AND OMF NORTH

DRAFT EIS - CONCEPTUAL DESIGN
L05 SEGMENT
EVERETT LINK EXTENSION & OMF NORTH
ALD-2F
GENERAL SITE PLANS

L05-GSP203
SHEET 85 OF 387
02/14/2025

12/24/24 | 9:34 AM | ALEKSI KRUGER
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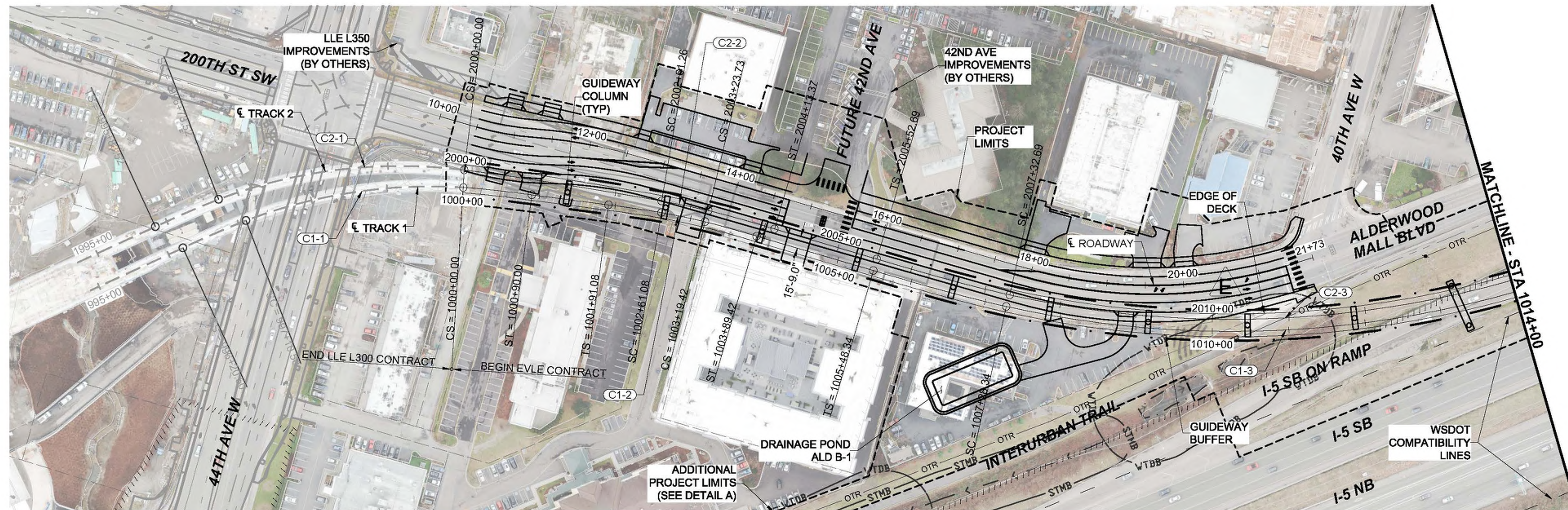


Kimley»Horn

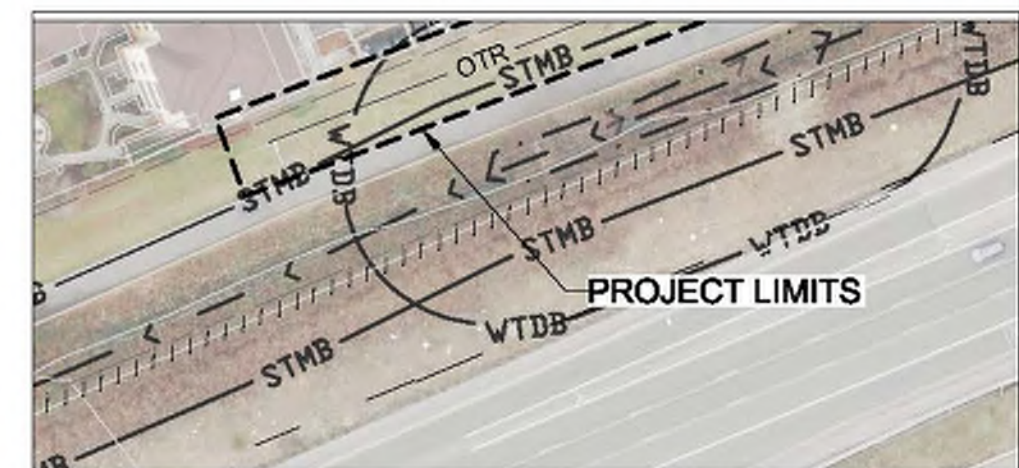
EVERETT LINK EXTENSION AND OMF NORTH

DRAFT EIS - CONCEPTUAL DESIGN
L05 SEGMENT
EVERETT LINK EXTENSION & OMF NORTH
ALD-1B
GENERAL SITE PLANS

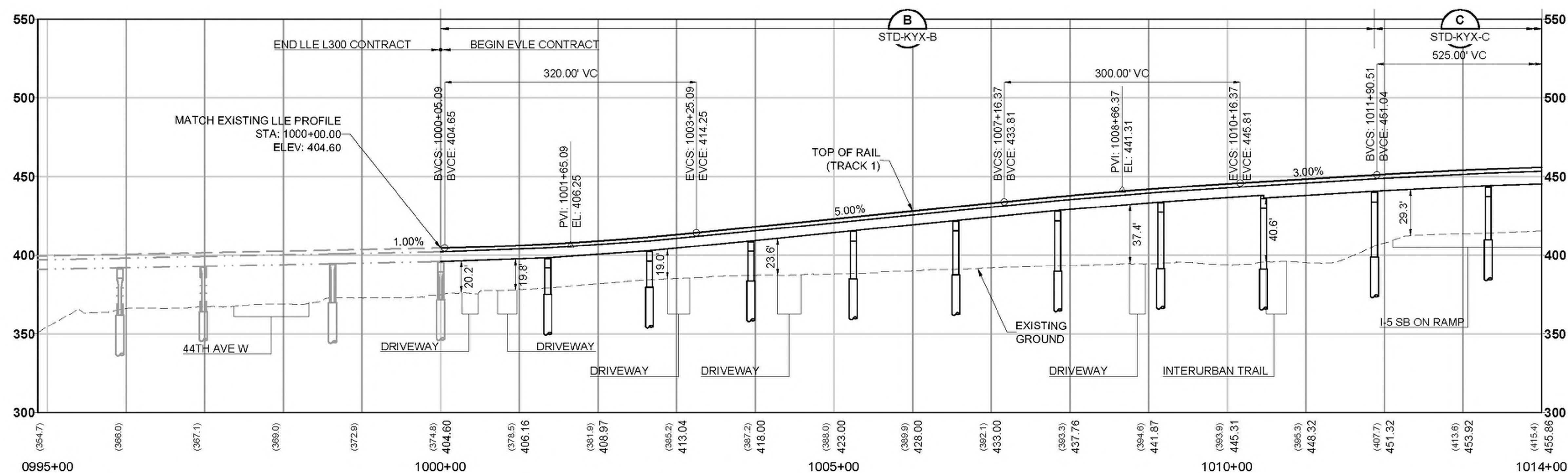
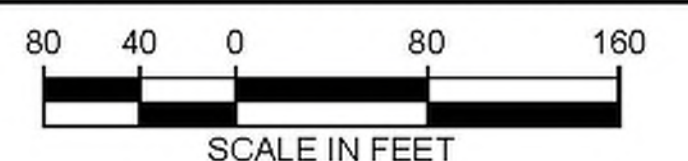
L05-GSP301
SHEET 98 OF 387
02/14/2025



- NOTES:
1. SEE STD SHEETS FOR NOTES, LEGEND, AND ABBREVIATIONS.
 2. ELECTRIC OVERHEAD TRANSMISSION LINE RELOCATIONS DUE TO PROPOSED CONSTRUCTION CONFLICTS ARE SHOWN FOR CONTEXT.
 3. SEE SHEET L05-CRV301 FOR ROADWAY PLAN AND PROFILE.
 4. FOR ROADWAY TYPICAL SECTION SEE SHEET STD-CRY101.

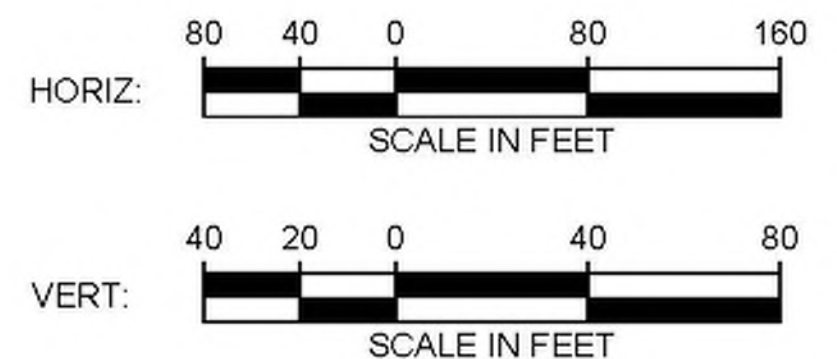


DETAIL A - ADDITIONAL PROJECT LIMITS



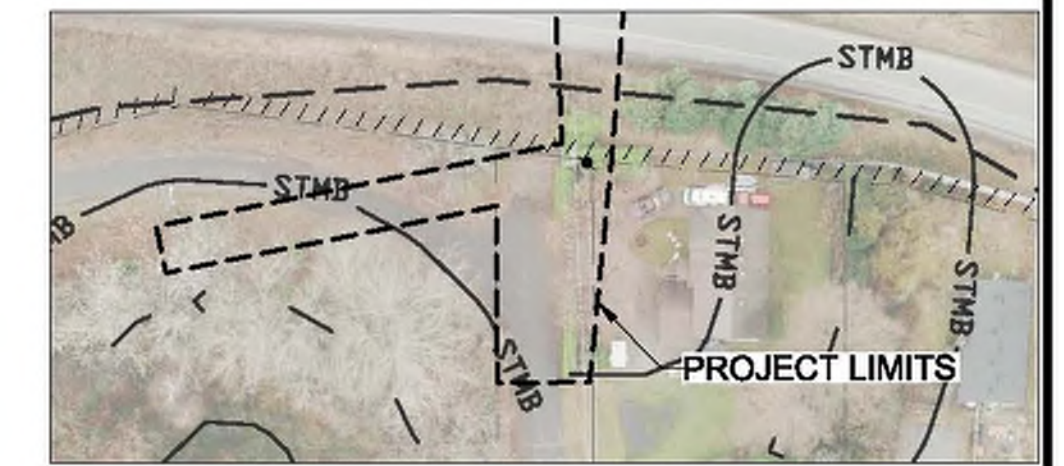
CURVE TABLE							
CURVE	RADIUS (FT)	Lc (FT)	Ls1 (FT)	Ls2 (FT)	Ea (IN)	Eu (IN)	V (MPH)
C1-1	675.0	289.5	90.0	90.0	2.75	2.53	30
C1-2	820.0	58.3	70.0	70.0	2.25	2.10	30
C1-3	1350.0	735.0	180.0	180.0	4.25	3.08	50
C2-1	665.0	326.5	90.0	261.3	2.75	2.61	30
C2-2	920.0	62.5	261.3	89.6	1.50	2.37	30
C2-3	1334.3	724.3	180.0	180.0	4.25	3.17	50

NOTES:
CURVES C1-1 & C2-1 ARE EXISTING LLE L300 CURVES. EVLE WILL ONLY ADJUST THE SUPERELEVATION OF THESE CURVES.

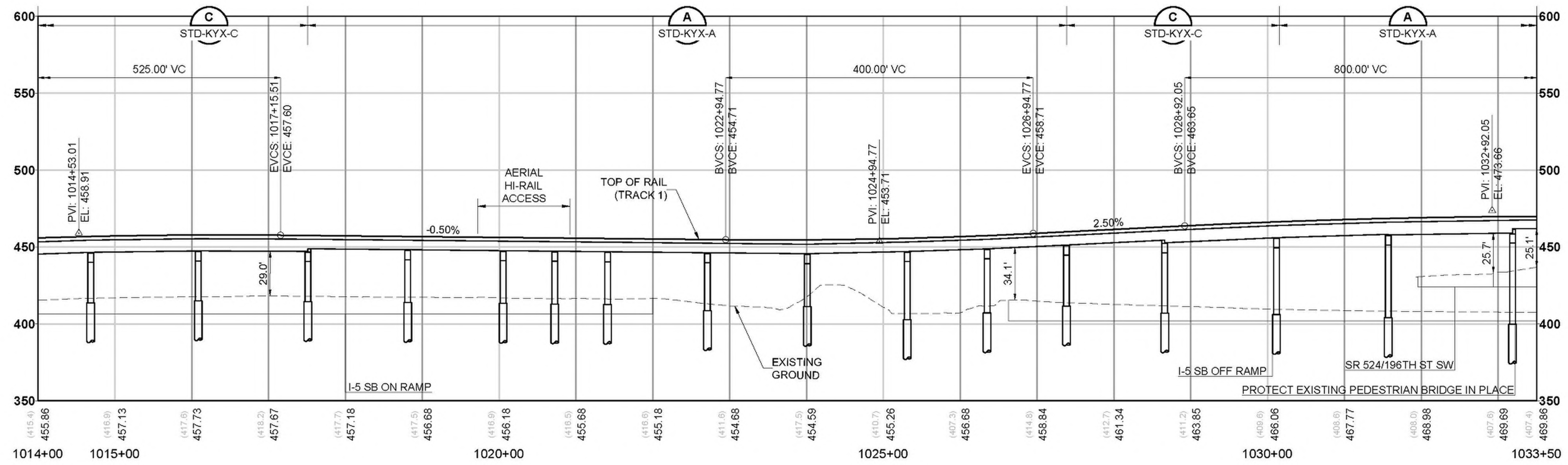
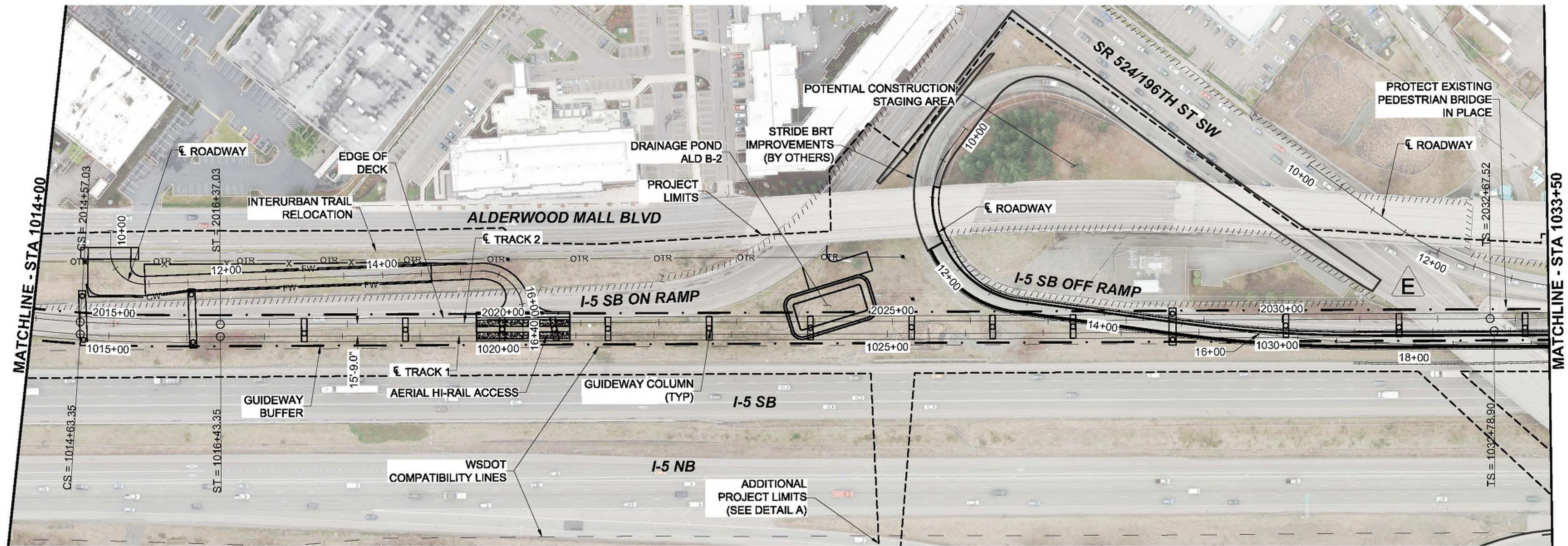
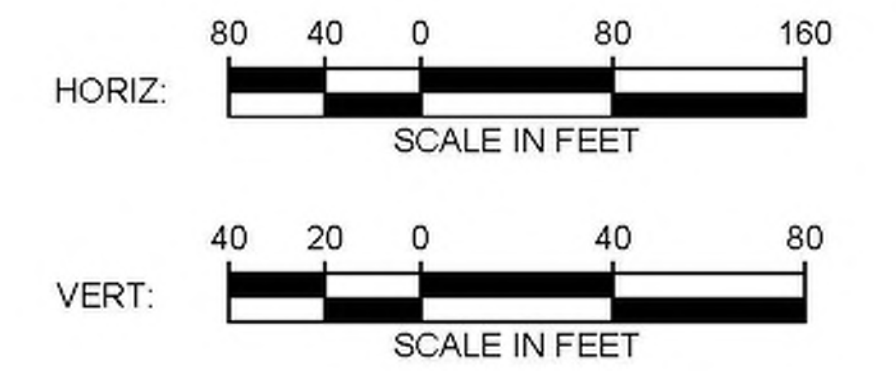




- NOTES:
1. SEE STD SHEETS FOR NOTES, LEGEND, AND ABBREVIATIONS.
 2. ELECTRIC OVERHEAD TRANSMISSION LINE RELOCATIONS DUE TO PROPOSED CONSTRUCTION CONFLICTS ARE SHOWN FOR CONTEXT.
 3. SEE SHEET L05-CRV302 AND L05-CRV303 FOR ROADWAY PLANS AND PROFILES.
 4. FOR ROADWAY TYPICAL SECTION SEE SHEETS STD-CRY101 AND STD-CRY102.



DETAIL A - ADDITIONAL PROJECT LIMITS



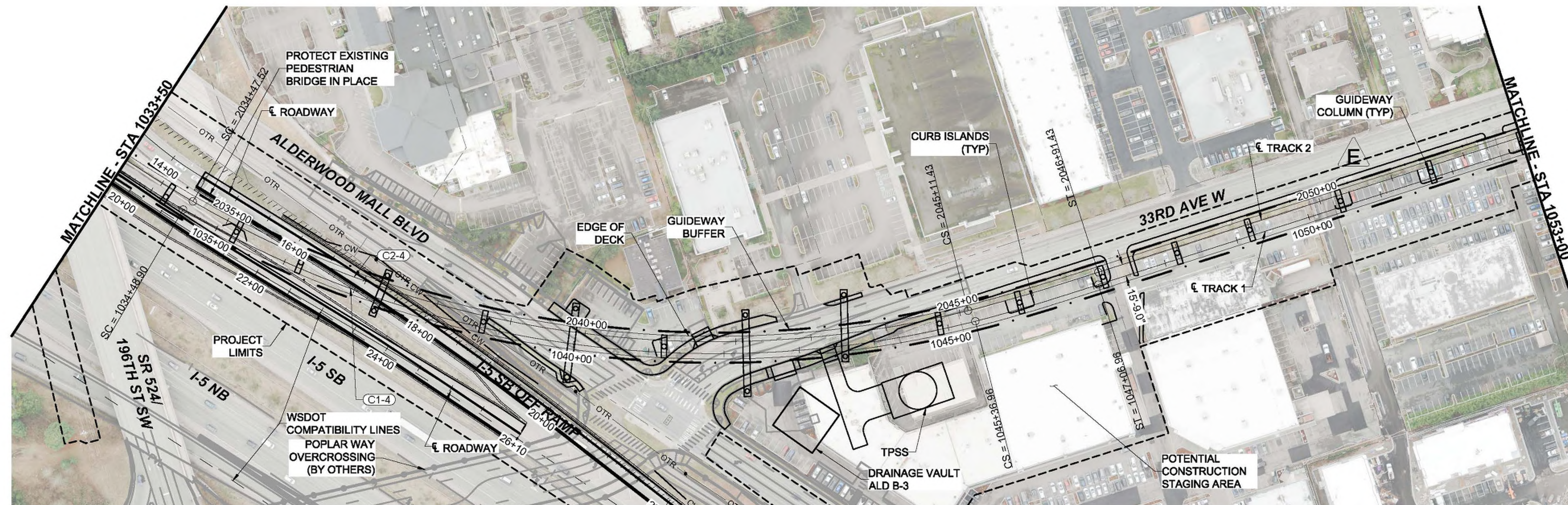
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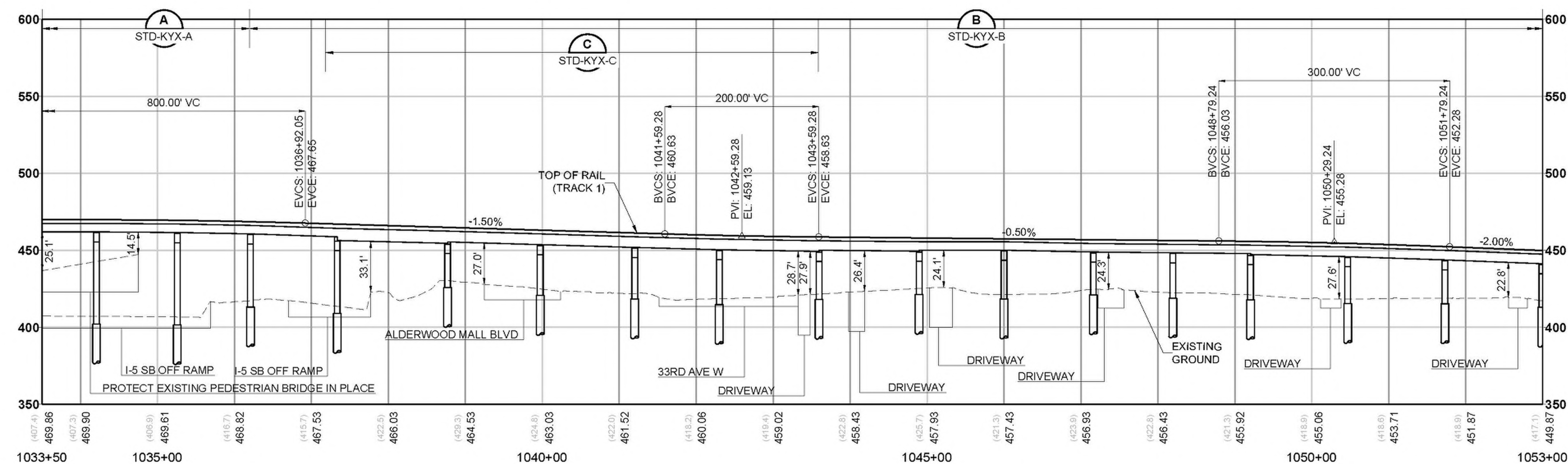
EVERETT LINK EXTENSION AND OMF NORTH

DRAFT EIS - CONCEPTUAL DESIGN
L05 SEGMENT
EVERETT LINK EXTENSION & OMF NORTH
ALD-1B
GENERAL SITE PLANS

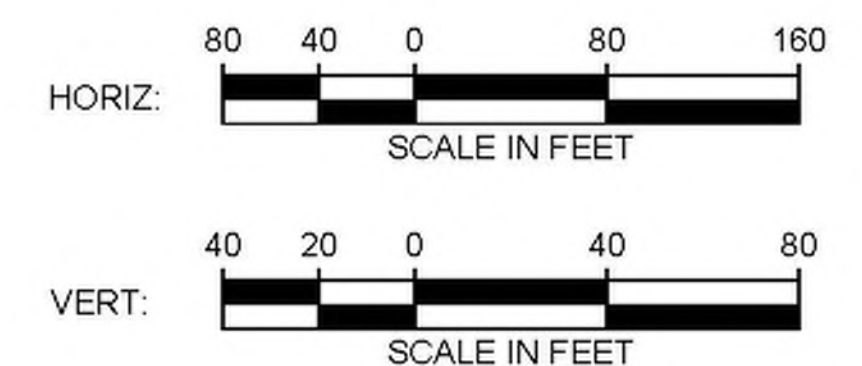
L05-GSP302
SHEET 99 OF 387
02/14/2025



- NOTES:
1. SEE STD SHEETS FOR NOTES, LEGEND, AND ABBREVIATIONS.
 2. ELECTRIC OVERHEAD TRANSMISSION LINE RELOCATIONS DUE TO PROPOSED CONSTRUCTION CONFLICTS ARE SHOWN FOR CONTEXT.
 3. SEE SHEET L05-CRV303 AND L05-CRV304 FOR ROADWAY PLANS AND PROFILES.
 4. FOR ROADWAY TYPICAL SECTION SEE SHEET STD-CRY103.



CURVE TABLE							
CURVE	RADIUS (FT)	Lc (FT)	Ls1 (FT)	Ls2 (FT)	Ea (IN)	Eu (IN)	V (MPH)
C1-4	1400.0	1088.1	170.0	170.0	4.00	3.07	50
C2-4	1384.3	1063.9	180.0	180.0	4.00	3.15	50



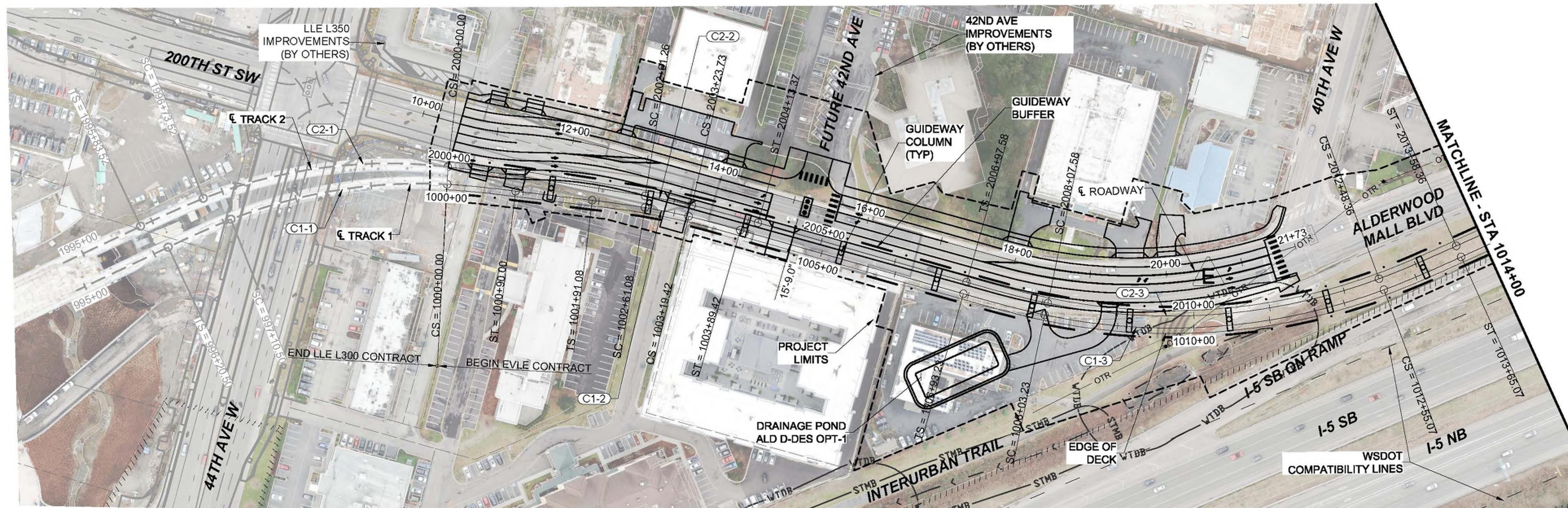
Kimley»Horn

EVERETT LINK EXTENSION AND OMF NORTH

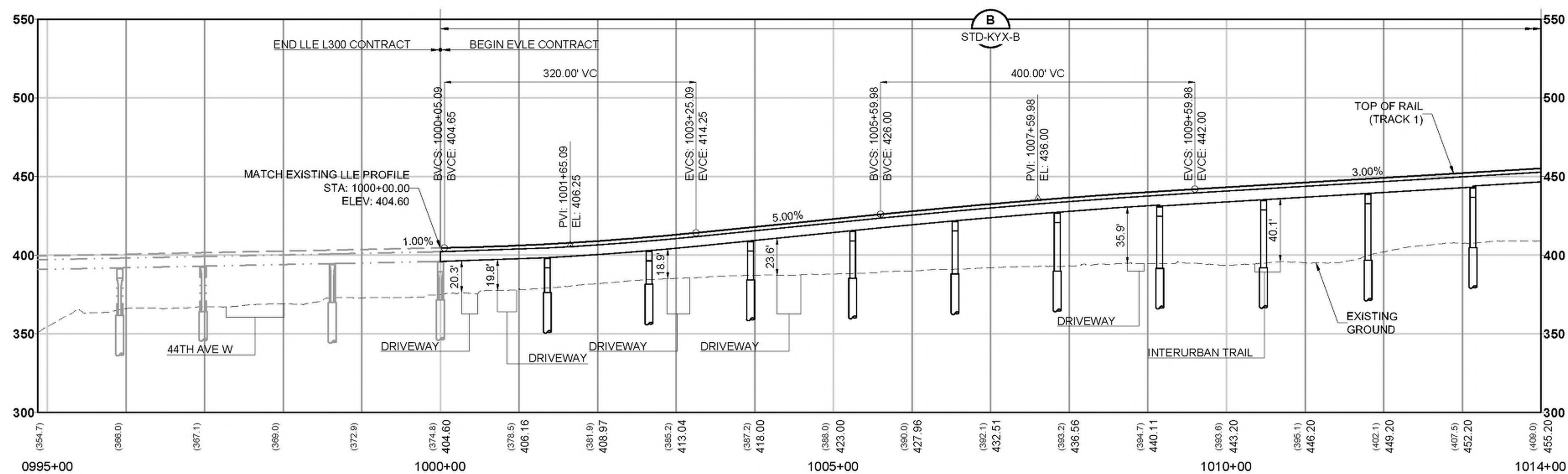
DRAFT EIS - CONCEPTUAL DESIGN
L05 SEGMENT
EVERETT LINK EXTENSION & OMF NORTH
ALD-1B
GENERAL SITE PLANS

L05-GSP303
SHEET 100 OF 387
02/14/2025

Attachment 2

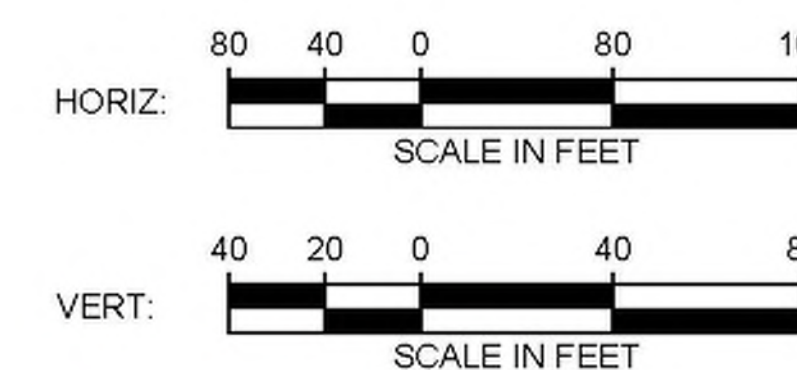


- NOTES:
1. SEE STD SHEETS FOR NOTES, LEGEND, AND ABBREVIATIONS.
 2. ELECTRIC OVERHEAD TRANSMISSION LINE RELOCATIONS DUE TO PROPOSED CONSTRUCTION CONFLICTS ARE SHOWN FOR CONTEXT.
 3. SEE SHEET L05-CRV401 FOR ROADWAY PLAN AND PROFILE.
 4. FOR ROADWAY TYPICAL SECTION SEE SHEETS STD-CRY101.



CURVE TABLE							
CURVE	RADIUS (FT)	Lc (FT)	Ls1 (FT)	Ls2 (FT)	Ea (IN)	Eu (IN)	V (MPH)
C1-1	675.0	289.5	90.0	90.0	2.75	2.53	30
C1-2	820.0	58.3	70.0	70.0	2.25	2.10	30
C1-3	800.0	451.8	110.0	110.0	3.50	2.56	35
C2-1	665.0	326.5	90.0	261.3	2.75	2.61	30
C2-2	920.0	62.5	261.3	89.6	1.50	2.37	30
C2-3	784.3	440.8	110.0	110.0	3.50	2.69	35

- NOTES:
- CURVES C1-1 & C2-1 ARE EXISTING LLE L300 CURVES. EVLE WILL ONLY ADJUST THE SUPERELEVATION OF THESE CURVES.



Note: Pages applicable to ALD-2D DO, ALD-2F DO, and ALD-1B DO

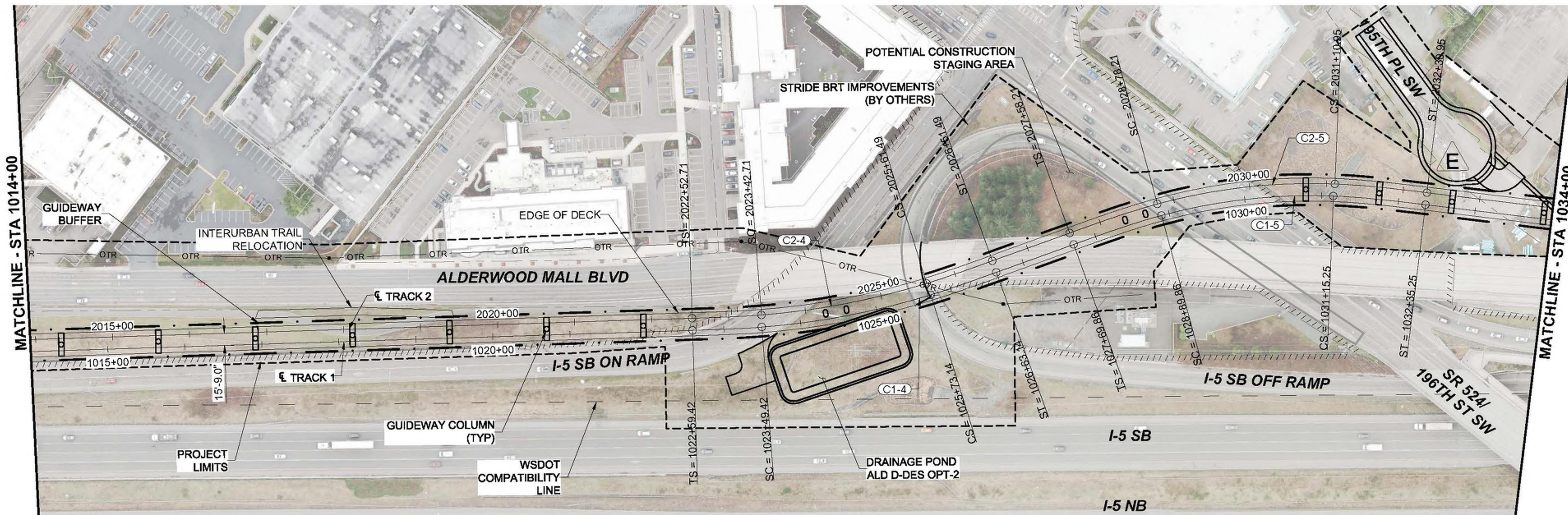


Kimley»Horn

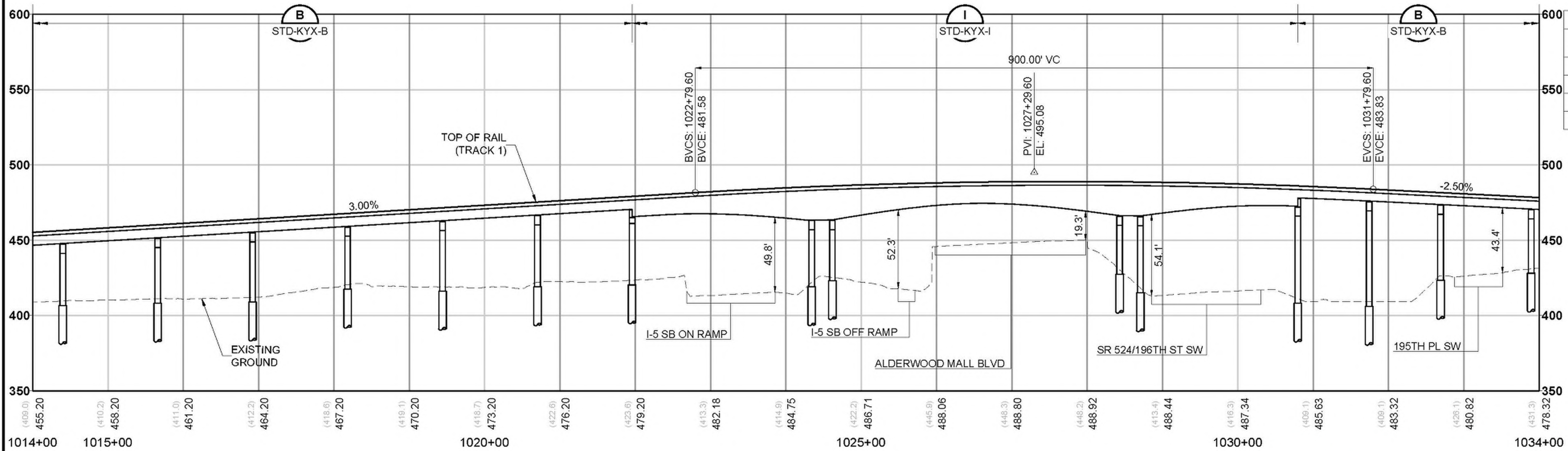
EVERETT LINK EXTENSION AND OMF NORTH

DRAFT EIS - CONCEPTUAL DESIGN
L05 SEGMENT
EVERETT LINK EXTENSION & OMF NORTH
ALD-2D-OPT
GENERAL SITE PLANS

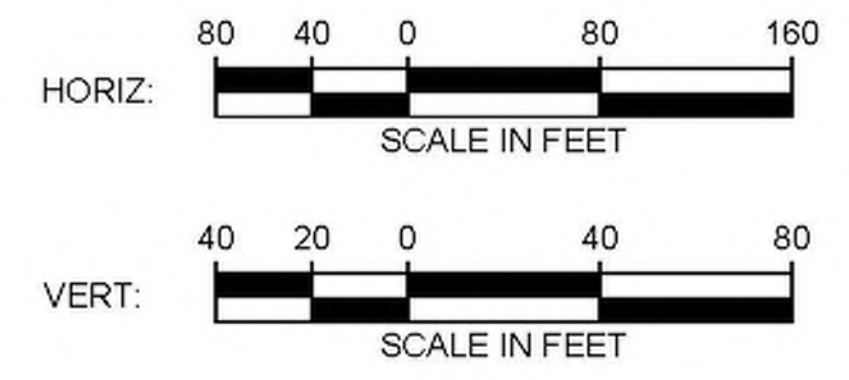
L05-GSP401
SHEET 114 OF 387
02/14/2025



- NOTES:
1. SEE STD SHEETS FOR NOTES, LEGEND, AND ABBREVIATIONS.
 2. ELECTRIC OVERHEAD TRANSMISSION LINE RELOCATIONS DUE TO PROPOSED CONSTRUCTION CONFLICTS ARE SHOWN FOR CONTEXT.
 3. FOR ROADWAY TYPICAL SECTION SEE SHEETS STD-CRY102 AND STD-CRY106.



CURVE TABLE							
CURVE	RADIUS (FT)	Lc (FT)	Ls1 (FT)	Ls2 (FT)	Ea (IN)	Eu (IN)	V (MPH)
C1-4	1000.0	223.7	90.0	90.0	2.75	2.10	35
C1-5	740.0	225.4	120.0	120.0	3.75	2.81	35
C2-4	984.3	218.8	90.0	90.0	2.75	2.18	35
C2-5	755.8	232.7	120.0	120.0	3.50	2.92	35



Note: Pages applicable to ALD-2D DO, ALD-2F DO, and ALD-1B DO

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EVERETT LINK EXTENSION AND OMF NORTH

DRAFT EIS - CONCEPTUAL DESIGN
L05 SEGMENT
EVERETT LINK EXTENSION & OMF NORTH
ALD-2D-OPT
GENERAL SITE PLANS

L05-GSP402
SHEET 115 OF 387
02/14/2025



May 19, 2026

Sharon Walker, Director
Parks Administration
Snohomish County
6705 Puget Park Drive
Snohomish, WA 98296

Subject: Everett Link Extension Project Section 4(f) Concurrence Request

Dear Ms. Walker:

As part of the Everett Link Extension (EVLE) Draft Environmental Impact Statement (EIS) documentation process, Sound Transit and the Federal Transit Administration (FTA), as the lead federal agency, are evaluating the potential impacts of the project on public parks and recreational facilities, wildlife/waterfowl refuges, and historic resources with regards to Section 4(f) of the Department of Transportation Act of 1966. Sound Transit is working with the FTA to prepare a draft Section 4(f) Evaluation that describes the impacts of the project on these resources. The Section 4(f) Evaluation will be included in the Draft EIS and is expected to be distributed to the public, Tribes, and agencies for comment in fall 2026.

Potential impacts to the Interurban Trail are included in that evaluation. Table 1 below summarizes the Ash Way Build Alternative project elements in relation to the Interurban Trail in unincorporated Snohomish County, including potential impacts. **Figure 1** and Figure 2 show the Interurban Trail within unincorporated Snohomish County. Relevant plan sheets for Alternative ASH-2D are included as Attachment 1.

CHAIR

Dave Somers
Snohomish County Executive

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Seattle Councilmember

Peter von Reichbauer
King County Councilmember

Kristina Walker
Tacoma Councilmember

Katie Wilson
Seattle Mayor

Girmay Zahilay
King County Council Vice Chair

CHIEF EXECUTIVE OFFICER
Dow Constantine

Table 1: Description of Project Elements in Relation to the Interurban Trail in Unincorporated Snohomish County

	Alternative ASH-1A	Alternative ASH-2D
Elevated guideway crossing over the Interurban Trail near SR 525 and I-5 ¹	X	
Elevated guideway crossing over the Interurban Trail near 169th Place SW		X
Guideway adjacent on the west side of the Interurban Trail between 160th Street SW and 140th Street SW		X
Relocation of 1,200 linear feet of Interurban Trail between 140th Street SW and 137th Street SW to maintain sufficient vertical clearance between the guideway and the trail; Interurban Trail would remain on Snohomish County Public Utility District property		X
Temporary construction easements would impact the Interurban Trail; detours would be provided to bypass any temporarily closed areas		X

¹ In this location, the Interurban Trail is an on-street bicycle lane on Maple Road and would not be subject to the requirement for Section 4(f) approval

The guideway would change the visual setting and result in an increase in noise and vibration for portions of the trail. However, these proximity impacts would not substantially impair the activities, features, and attributes of the trail. Any areas of the trail that are disturbed would be restored to existing conditions or better or replaced, in coordination with Snohomish County.

A temporary use occurs when the project temporarily occupies any portion of a Section 4(f) resource (typically during construction) and substantially impairs the property. However, if all the conditions from 23 CFR 774.13(d) listed below are met, a temporary occupancy is not considered a use under Section 4(f):

- The duration of use would be temporary (i.e., less than the time needed for construction of the project), and there would be no change in ownership of land.
- The scope of work would be minor (i.e., both the nature and magnitude of the changes to the Section 4(f) resource would be minimal).
- There would be no anticipated permanent adverse physical impacts, nor would there be interference with the protected activities, features or attributes of the resource, on either a temporary or permanent basis.
- The land being used would be fully restored to a condition that is at least as good as that which existed before the project.
- There is documented agreement of the official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions.

Sound Transit believes that the potential impacts to the Interurban Trail within Snohomish County may meet the temporary occupancy exception criteria listed above. To meet the last criterion, we ask that you provide your concurrence that the conditions from 23 CFR 774.13(d) listed above are met by returning this letter with your signature below.

Sound Transit appreciates Snohomish County's continued coordination on the Interurban Trail property. We are requesting a response to this request within 30 days in order to incorporate the County's response in the Draft EIS. Please contact me at 206-650-8681 or eric.widstrand@soundtransit.org if you have any questions.

Sincerely,

Eric Widstrand

Eric Widstrand
EVLE Project Planning Director
eric.widstrand@soundtransit.org
206-650-8681

Sharon Walker

Sharon Walker, Director of Parks Administration
Concurrence

6/26

Date

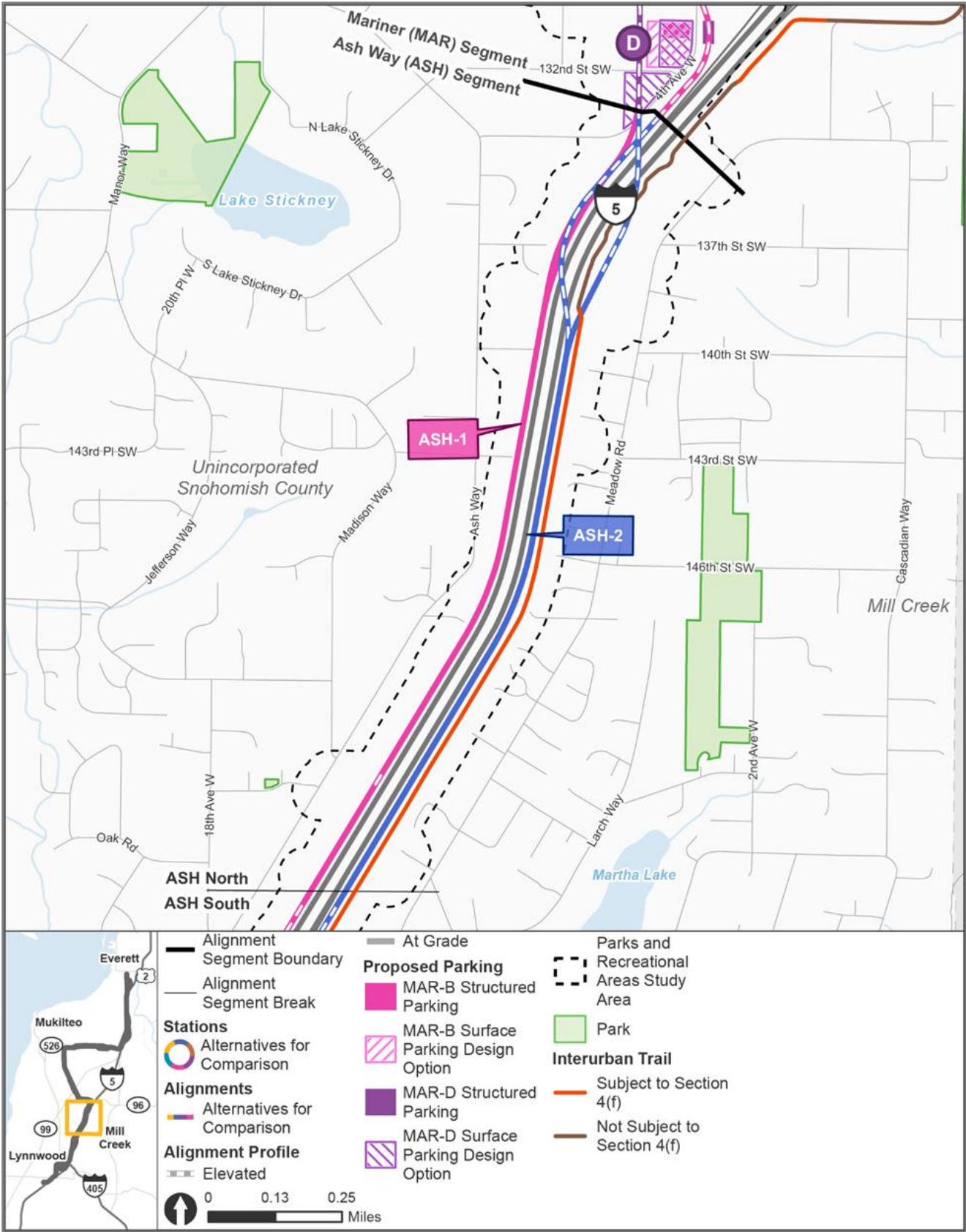
cc: Todd Tillenger, FTA
Terence Plaskon, FTA
Galeeb Kachra, North Corridor Environmental Manager
Hussein Rehmat, Environmental Planner

Map Details:

- Segments:**
 - Ash Way (ASH) Segment
 - West Alderwood (ALD) Segment
- Stations:**
 - Everett
 - Mukilteo
 - Mill Creek
 - Lynnwood
- Alignments:**
 - Preferred Alternative (Green line)
 - Alternatives for Comparison (Colored lines: A, D, ASH-1, ASH-2)
- Alignment Profile:**
 - Elevated (Thick grey line)
 - At Grade (Thin grey line)
- Parks and Recreational Areas Study Area:**
 - Park (Green shaded area)
- Interurban Trail:**
 - Subject to Section 4(f) (Orange line)
 - Not Subject to Section 4(f) (Brown line)

Scale: 0, 0.13, 0.25 Miles

Figure 2: Interurban Trail Within the Ash Way Segment (North)



Attachment 1

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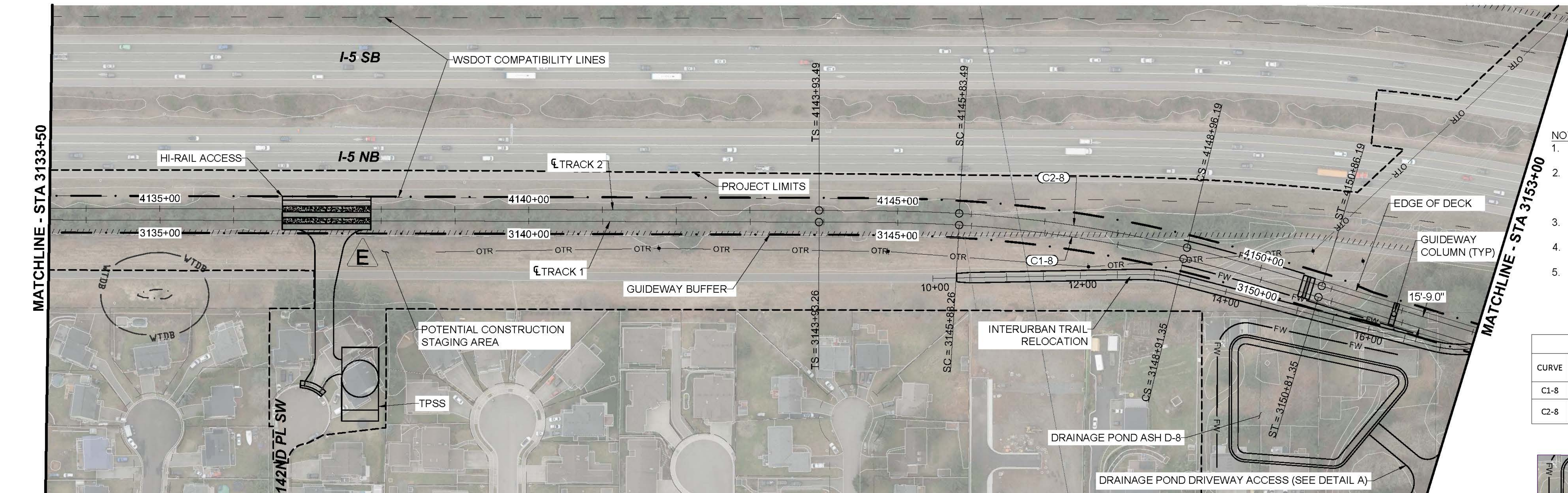


Kimley»Horn

EVERETT LINK EXTENSION AND OMF NORTH

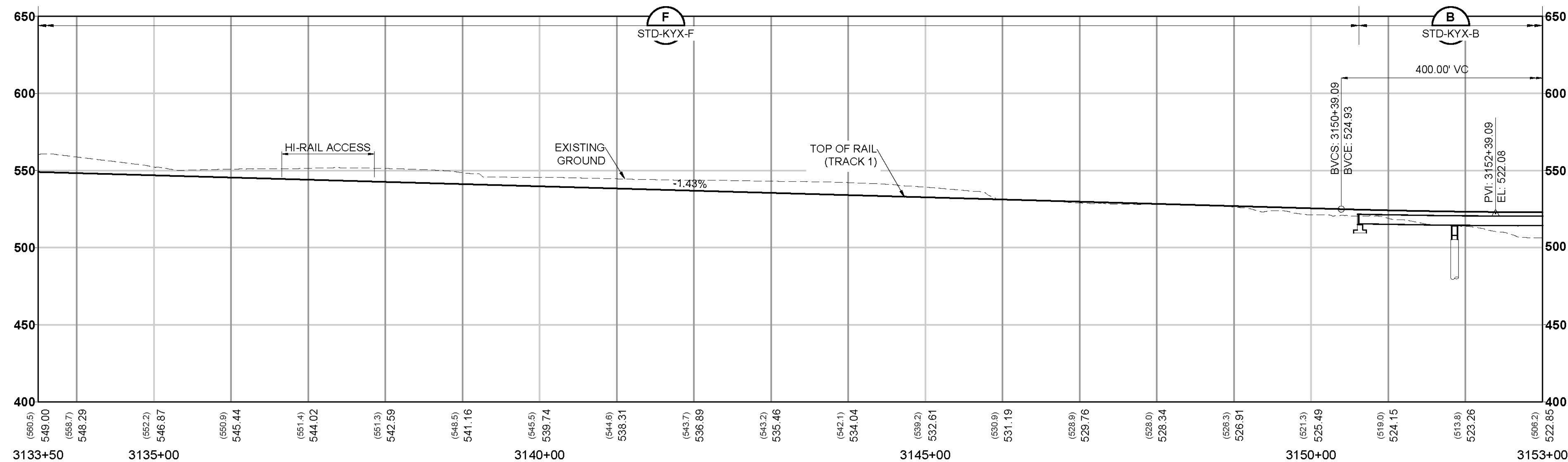
DRAFT EIS - CONCEPTUAL DESIGN
L10 SEGMENT
EVERETT LINK EXTENSION & OMF NORTH
ASH-2D W/ MAR-2D
GENERAL SITE PLANS

L10-GSP208
SHEET 143 OF 387
02/14/2025

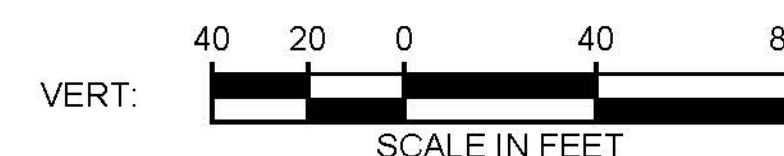
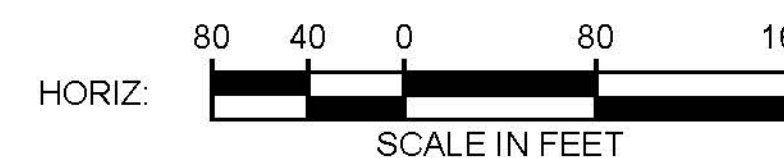
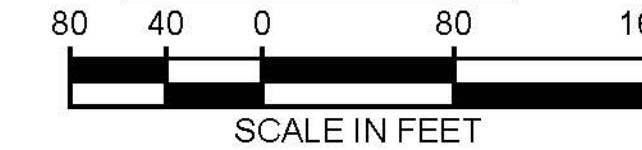


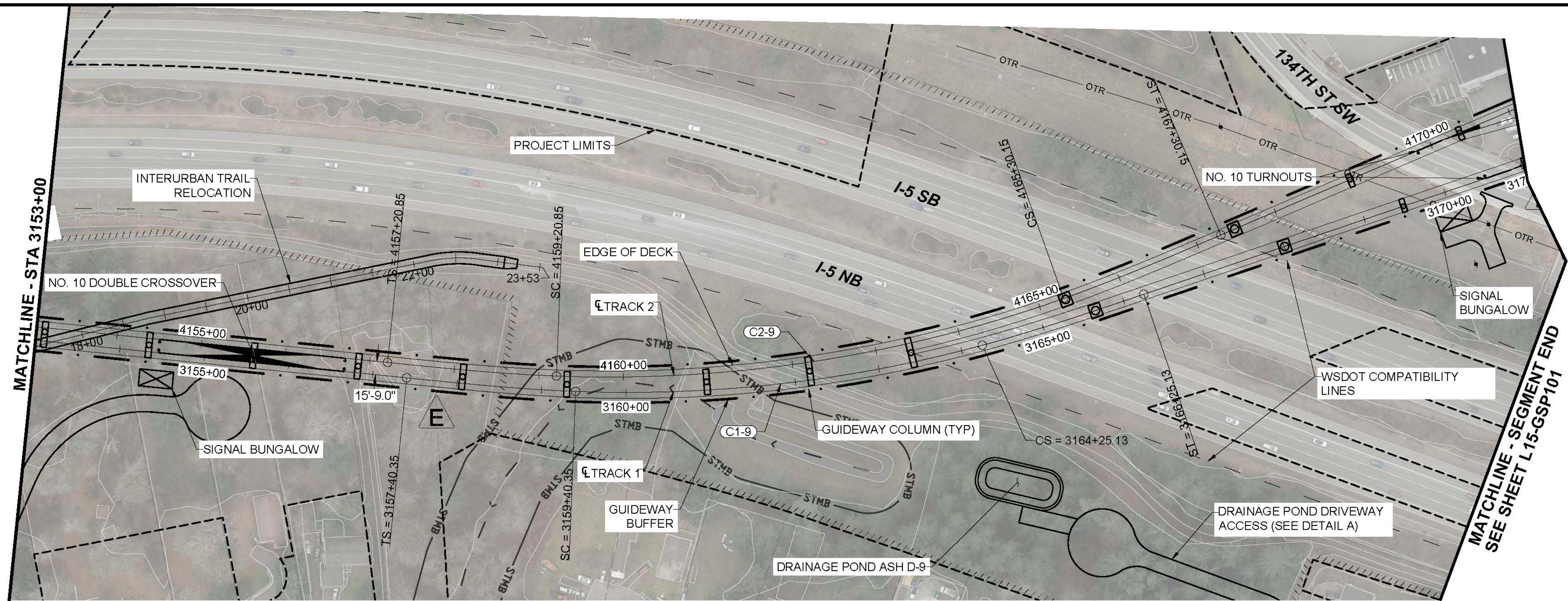
- NOTES:
1. SEE STD SHEETS FOR NOTES, LEGEND, AND ABBREVIATIONS
 2. ELECTRIC OVERHEAD TRANSMISSION LINE RELOCATIONS DUE TO PROPOSED CONSTRUCTION CONFLICTS ARE SHOWN FOR CONTEXT
 3. SEE SHEET L10-CRV202 FOR INTERURBAN TRAIL PLAN AND PROFILE.
 4. FOR ROADWAY TYPICAL SECTION SEE SHEET STD-CRY106 AND STD-CRY108.
 5. NORTH END OF SEGMENT AS SHOWN CONNECTS TO MAR-2D. SEE SHEETS L10-GSP408 AND L10-GSP409 FOR DESIGN OF CONNECTION TO MAR-1B.

CURVE TABLE						
CURVE	RADIUS (FT)	Lc (FT)	Ls1 (FT)	Ls2 (FT)	Ea (IN)	Eu (IN)
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C2-8	1715.8	312.7	190.0	190.0	4.00	2.98



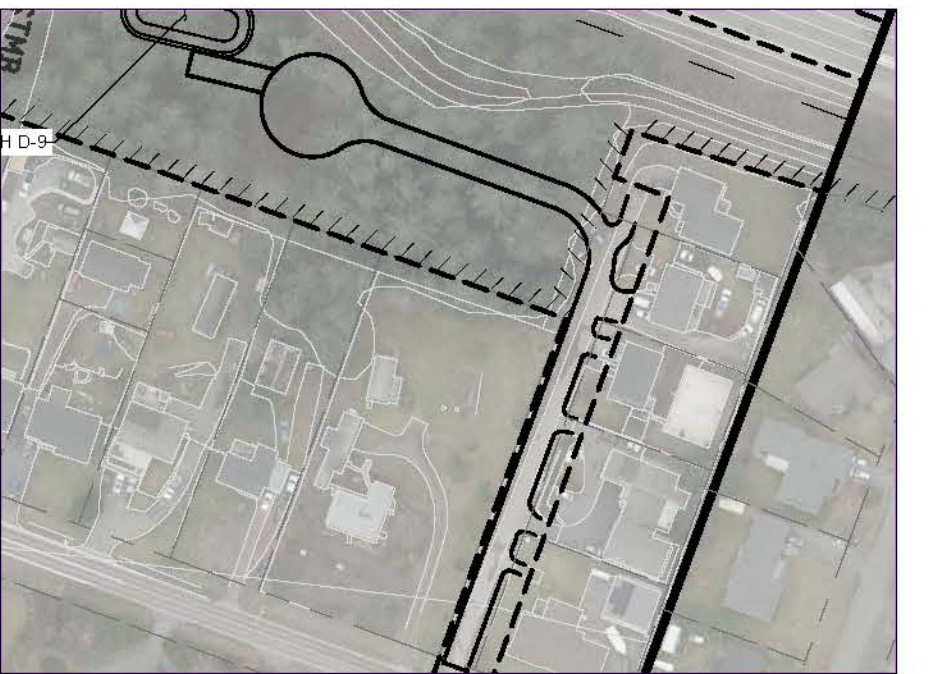
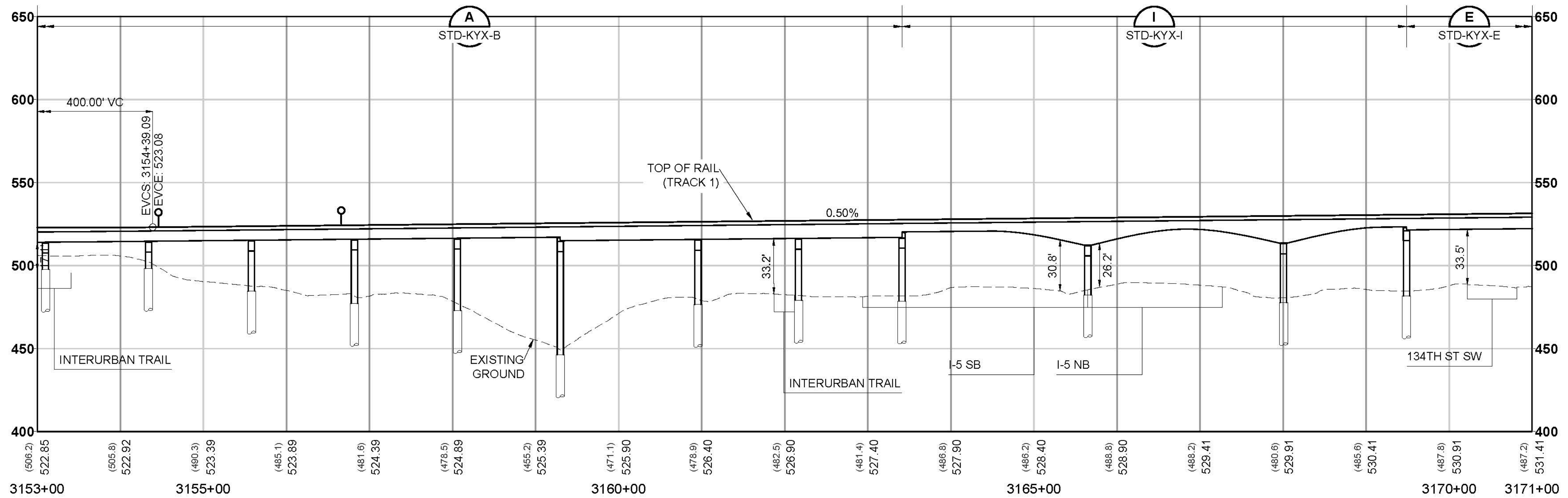
DETAIL A - DRAINAGE POND
DRIVEWAY ACCESS



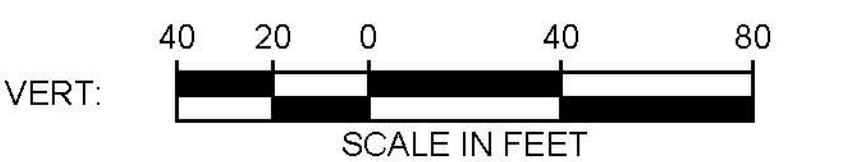
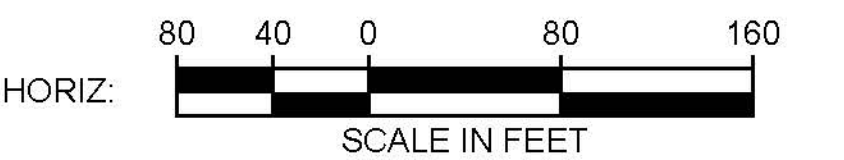
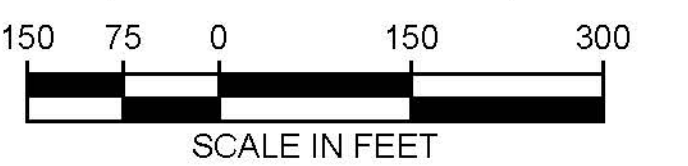


- NOTES:
1. SEE STD SHEETS FOR NOTES, LEGEND, AND ABBREVIATIONS
 2. ELECTRIC OVERHEAD TRANSMISSION LINE RELOCATIONS DUE TO PROPOSED CONSTRUCTION CONFLICTS ARE SHOWN FOR CONTEXT
 3. SEE SHEET L10-CRV202 FOR INTERURBAN TRAIL PLAN AND PROFILE
 4. FOR ROADWAY TYPICAL SECTION SEE SHEET STD-CRY108.
 5. NORTH END OF SEGMENT AS SHOWN CONNECTS TO MAR-2D. SEE SHEETS L10-GSP408 AND L10-GSP409 FOR DESIGN OF CONNECTION TO MAR-1B.

CURVE TABLE							
CURVE	RADIUS (FT)	Lc (FT)	Ls1 (FT)	Ls2 (FT)	Ea (IN)	Eu (IN)	V (MPH)
C1-9	1600.0	484.8	200.0	200.0	4.25	3.24	55
C2-9	1600.0	609.3	200.0	200.0	4.25	3.24	55



DETAIL A - DRAINAGE POND DRIVEWAY ACCESS



Kimley»Horn

EVERETT LINK EXTENSION AND OMF NORTH

DRAFT EIS - CONCEPTUAL DESIGN
L10 SEGMENT
EVERETT LINK EXTENSION & OMF NORTH
ASH-2D W/ MAR-2D
GENERAL SITE PLANS

L10-GSP209
SHEET 144 OF 387

02/14/2025



Everett Link Extension

Draft Environmental Impact Statement

QUALITATIVE ANALYSIS METHODOLOGY FOR POTENTIAL DESIGN REFINEMENTS

Appendix I

1 INTRODUCTION

This appendix describes the approach used to qualitatively evaluate the impacts of potential design refinements (referred to as ‘refinements’ within this appendix) that could reduce overall project costs if applied to the alignment and station alternatives. No refinements have been identified to date for the OMF North site alternatives. These refinements are introduced in Section 2.4.4 of the Draft Environmental Impact Statement (EIS), and potential changes to impacts due to the refinements are described in Draft EIS Section 4.4.2 and Appendix G. As engineering of the project advances, additional refinements may be identified after publication of the Draft EIS and would be evaluated in the Final EIS as appropriate.

The [EIS Technical Analysis Methods Report](#), which describes the methodology used to evaluate environmental impacts of the No Build and Build Alternatives on specific environmental resources, is available on the Sound Transit website.

2 APPROACH BY RESOURCE

A preliminary footprint for each refinement was developed to determine whether parcels might be permanently affected by the project, in addition to the potentially affected parcels identified in the Draft EIS. These parcels are identified in Draft EIS Appendix G.2. The additional parcels were used to evaluate potential changes in impacts for many of the resource areas. The following describes how all potential changes in impacts were evaluated.

- **Transportation:** Changes to the guideway or other structures that may have impacts on the street network, parking, aviation uses, or station access were identified.
- **Acquisitions, Displacements, and Relocations:** The preliminary footprint for each refinement was reviewed to identify additional potentially affected parcels and displacements.
- **Economics:** The preliminary footprints and additional parcels were reviewed to identify businesses that may be displaced.
- **Social Resources, Community Facilities, and Neighborhoods:** The preliminary footprints and additional parcels were reviewed to identify social resources or community facilities that may be displaced.
- **Visual and Aesthetic Resources:** Impacts to visual quality would occur if the overall existing visual quality would be reduced by one or more categories (from high to average, from high to low, or from average to low) after the project has been built and the changes would be seen by sensitive viewers. To analyze potential changes in visual quality impacts, visual components of the refinements (e.g., guideway profile and type) were compared to the conceptual design of the alternatives as evaluated in the Draft EIS to identify if they could have a substantive change on the visual quality rating under the Build Alternatives. Where the refinements were not anticipated to change the assessment of visual quality impacts from the Draft EIS, the potential for different visual changes was noted.
- **Noise and Vibration:** Potential changes to the guideway (e.g., relocation of crossovers) were reviewed in relation to noise and vibration sensitive uses such as residences or hotels.

- **Water Resources:** The potential for the guideway and other structures to interact with the surface waters, floodplains, and groundwater resources identified within the affected environment was reviewed.
- **Ecosystems:** The potential for the guideway and other structures to interact with the ecosystem resources identified within the affected environment was reviewed, including adjacent regulatory buffer areas.
- **Public Services, Safety, and Security:** The preliminary footprints and additional parcels were reviewed to identify public service facilities that may be displaced. The potential for access changes to public service providers was also reviewed.
- **Parks and Recreational Resources:** The preliminary footprints and additional parcels were reviewed to identify if the refinements would be located on a property identified as a park or recreational resource or would impact access to these resources.
- **Historic and Archaeological Resources:** The list of historic and archaeological resources located within 1 mile of the Area of Potential Effect (APE) was reviewed to determine if any additional resources would be impacted.

Impacts to regional transportation and safety, the regional economy, land use, and stormwater were not evaluated as the relatively small-scale nature of the refinements would not be anticipated to substantively change the Draft EIS analysis.

As stated in Section 4.2 of the Draft EIS, the analyses for Air Quality, Energy, Geology and Soils, Hazardous Materials, Electromagnetic Fields, and Utilities concluded that none of the Build Alternatives would result in significant adverse impacts on those resources, nor would there be substantial differences in impacts among Build Alternatives. Due to the nature of the potential design refinements, it was considered unlikely that they would substantively change that assessment.



Everett Link Extension

Draft Environmental Impact Statement

SEPA ANALYSIS

Appendix J

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Attachments

Attachment A Greenhouse Gas Model Outputs

Acronyms

ADA	Americans with Disabilities Act
ASH	Ash Way
CO ₂	carbon dioxide
EGN	SR 526/Evergreen
EIS	Environmental Impact Statement
EMF	Electromagnetic Field
EVLE	Everett Link Extension
EVT	Everett Station
FTA	Federal Transit Administration
GHG	greenhouse gas
HOV	high-occupancy vehicle
I-5	Interstate 5
ISO	International Organization for Standardization
CH ₄	methane
MAR	Mariner
MTCO _{2e}	metric tons of carbon equivalent
NEPA	National Environmental Policy Act
N ₂ O	nitrous oxide
OMF	operations and maintenance facility
PSRC	Puget Sound Regional Council
RCW	Revised Code of Washington
SEPA	State Environmental Policy Act
SnoPUD	Snohomish County Public Utility District
SR	State Route
ST3	Sound Transit 3
SWI	SW Everett Industrial Center
TOD	transit oriented development

UGA	urban growth area
VMT	vehicle miles traveled
WAC	Washington Administrative Code
WSDOT	Washington State Department of Transportation

1 INTRODUCTION

The Washington State Environmental Policy Act (SEPA) requires that an Environmental Impact Statement (EIS) disclose effects of a proposed action on the environment. To the extent the laws of the State of Washington require Sound Transit to consider the effects of greenhouse gas (GHG) emissions and climate change, or indirect and cumulative impacts as part of the state environmental review, such analysis is provided in this appendix (Sections 2, 3, and 4). This appendix describes how Sound Transit integrates environmental ethics and sustainable business practices into the agency's planning, design, construction, and operations (Section 5). Finally, this appendix details how the EVLE Project would support and be consistent with regional and local planning goals (Section 6).

This appendix was developed by Sound Transit solely for the purpose of complying with State law. The Federal Transit Administration (FTA) was not involved in the development of this appendix and did not consider this information in the Draft EIS.

SEPA requires that an EIS evaluate and disclose the range of probable environmental impacts, defined as "direct, indirect, and cumulative impacts" (Washington Administrative Code (WAC) 197-11-060(4)). Direct impacts are caused by the action and occur at the same time and place. Indirect impacts (sometimes called "secondary impacts") are caused by the action but are later in time or farther removed in distance. Examples include changes in land use, development and travel patterns, and neighborhood composition or character. Cumulative impacts could result from the project's incremental impact when added to other past, present, and reasonably foreseeable future actions. Direct impacts are discussed in Chapters 3 and 4 of the Draft EIS and the technical reports in Draft EIS Appendix G. Indirect and cumulative impacts are discussed below.

Public agencies must analyze indirect and cumulative impacts to fully understand how a proposed action and its alternatives interact with past actions, present-day activities, and actions that are planned and reasonably certain to occur in the future. Studying the proposed project in conjunction with other actions can reveal unintended impacts that may not be clear when the proposed project is analyzed by itself.

Analysis of indirect and cumulative impacts has influenced all parts of the project, including scoping, alternatives development, describing the affected environment, and evaluation of direct environmental impacts and potential mitigation measures. The indirect and cumulative impacts analysis follows the *State Environmental Policy Act Handbook* (Washington State Department of Ecology 2025) guidance.

2 INDIRECT IMPACTS

This section describes indirect impacts for all alternatives by topic area.

2.1 Transportation

2.1.1 Regional Transportation

The completion of the EVLE Project would provide reliable light rail service between Everett and many of the region's urban and employment centers. Light rail service could help facilitate potential increases in residential and employment uses around stations. This could lead to corresponding changes in regional travel patterns as both trips to and from these areas potentially increase for all travel modes, thus affecting transit, traffic volumes, parking demand, and non-motorized users.

2.1.2 Transit

In addition to the planned changes to local and regional bus service assumed for the EVLE Project, local transit agencies could make additional changes in response to the project. These could include redeploying and/or reinvesting in bus service that is replaced by the EVLE light rail service. Such changes are dependent on transit funding and would result in a net benefit for transit riders. Also, ridership on the Sounder North commuter rail service could be affected if some riders choose to shift from commuter rail to light rail at Everett Station. This would free up additional capacity on Sounder trains for riders boarding at Mukilteo and Edmonds stations. The EVLE Project may also provide improved access to the Amtrak Station in Everett, improving ridership on the Amtrak Cascades route. Some bus riders could be affected if there are additional changes to the bus system beyond the previously identified bus integration plans to support new connections with the light rail system.

Light rail service could facilitate a concentration of residential and commercial land uses, known as transit oriented development (TOD), surrounding the stations. The population and employment projections used in Sound Transit's ridership forecasting model were the Puget Sound Regional Council (PSRC) Land Use Targets. Because the Sound Transit and PSRC travel demand models already include adopted land use changes, the overall EVLE ridership is not expected to substantially change as a result of TOD around future EVLE light rail stations. However, the mode of access to and from stations may shift to a greater percentage of non-motorized access or transit transfers and a lower percentage of automobile access as the population and employment densities increase within station area walksheds and bikesheds.

Any development beyond the PSRC's adopted population and employment land use forecasts for 2046 could require further regional and local planning and policy decisions. This could result in overall ridership increases in the EVLE Project corridor.

2.1.3 Arterial and Local Street Operations

Increased automobile and bus transit trips both to and from the station areas could result from potential increases in land use and development density around the light rail stations in the corridor. This increase in traffic could cause additional impacts on arterial and local street operations near stations. Conversely, increased development along the light rail corridor could

also result in shifts from automobile trips to other travel modes, such as transit, bicycle, and pedestrian trips.

2.1.4 Parking

The potential for increased land use and development density around station areas in the EVLE Project corridor could increase the demand for parking in these areas. The demand for park-and-ride spaces beyond 0.25 miles from the stations could increase because riders could park along bus routes that connect to the stations and travel to the station by bus. There could be reduced demand at park-and-rides on parallel corridors from riders shifting to the light rail service.

2.1.5 Non-Motorized Facilities

Higher-density residential and commercial development around station areas could drive additional pedestrian and bicycle trips. These non-motorized trips could travel along older streets that lack Americans with Disabilities Act (ADA) accessibility but could encourage improvements to these facilities by local jurisdictions as increased usage becomes evident.

2.1.6 Safety

The potential for increases in residential and employment uses around the light rail stations could lead to an increase in motorized and non-motorized activity and further conflicts among all travel modes (automobile, transit, and non-motorized).

2.1.7 Aviation

The project would improve public transportation access to Paine Field, particularly with Alternative SWI-1C which would be the closest station location to the airport. The station area, regardless of alternative, would include an elevated station platform, transit plaza, and designated areas for vehicular and bus pick-up/drop-off, including microtransit and airport shuttles.

2.1.8 Freight

Increased automobile and bus transit trips both to and from the station areas could result from potential increases in land use and development density around the light rail stations along the EVLE Project corridor. The increase in traffic could cause additional impacts on arterial and local street operations near stations, which could affect freight mobility and access on local roadways. Any operational impacts on freight would be similar to those for automobiles; however, freight routes are fewer, which could result in more pronounced impacts to freight movement.

2.2 Acquisitions, Displacements, and Relocations

The EVLE Project could have indirect impacts on nearby parcels from redevelopment around the stations. The potential indirect impacts associated with TOD are discussed in the Land Use section (Section 2.3). The potential indirect impacts associated with displacement of commercial

and industrial uses are discussed in the Economics section (Section 2.4). Businesses and property owners along the corridor may choose to close or relocate due to adverse impacts of the project including noise, visual changes, and changes to traffic and vehicle access.

2.3 Land Use

2.3.1 Stations and Alignments

Improvements in transportation systems, such as the EVLE Project, can influence changes to nearby land uses. Cities and counties control land use regulations, including zoning, and property owners make decisions about developing or redeveloping their property. Under typical local zoning and land use plans, projects such as the EVLE Project could indirectly affect land use by acting as a catalyst for others to develop or redevelop land near project facilities consistent with local jurisdiction land use and zoning requirements. This type of development could increase availability and density of housing options, including affordable housing units. Alternatively, this could result in the indirect effect of increased housing prices and business rent around station areas.

TOD is a pattern of land use and development that includes a mix of uses at higher density or intensity in the vicinity of transit stations. TOD generally occurs when stations are in prime regional or community centers, areas attractive to typical market forces, areas with active regional and local real estate markets with willing investors, and jurisdictions where public policies and regulations such as zoning encourage intensive development in station areas. There is also the potential for joint development of transit facilities like station entrances and concourses, as well as redevelopment of surplus properties no longer needed after construction.

The Sound Transit Board adopted the *Equitable Transit Oriented Development Policy* in 2018 (Board Resolution No. R2018-10). The policy addresses how the agency should consider potential for TOD near transit facilities being planned and studied and provides guidance on implementing and integrating equitable TOD throughout transit projects.

The policy supports land use changes and economic development that would maximize ridership while supporting achievement of comprehensive and regional plans and improving quality of life. During alternatives development and design, this policy guides Sound Transit to incorporate TOD criteria as a decision-making factor that considers local and regional comprehensive plans. Sound Transit's Equitable TOD policy promotes TOD within station areas and on Sound Transit surplus property that is no longer needed for transit and seeks proposals from developers that support various income levels and family sizes. It also provides guidance to engage communities equitably in planning for TOD, particularly for low-income communities and communities of color, and contains goals to support and encourage equitable economic development and opportunities for existing residences and businesses.

Notably, the policy also supports exploration of development potential of transit project decisions and pursuit of joint or co-development of transit facilities where and when appropriate. There is specific priority placed on partnerships that deliver affordable housing, responding to a state statute that requires Sound Transit to first offer at least 80% of surplus property suitable for housing to qualified developers of affordable housing, who are then obligated to ensure 80% of housing units constructed are affordable to those earning 80% or less of the area median income for the county.

Sound Transit is partnering with the jurisdictions of Lynnwood, Everett, and Snohomish County to update land use regulations in advance of the EVLE Project. The partnership is funded by the FTA through their TOD Pilot Program. The goal of this effort, called the Model Code Partnership, is to update local regulations to facilitate TOD, multimodal transportation, economic development, infrastructure improvements, public/private partnerships, green building, affordable housing, and other topics supported by the jurisdictions. As part of this effort, the jurisdictions are working with Sound Transit to update their comprehensive plans and land use codes to better accommodate light rail stations and associated facilities.

Sound Transit also prepared a study, *Station Area Development Opportunities Evaluation* (Sound Transit 2025), to identify and assess specific potential TOD opportunities associated with the EVLE stations to identify areas where TOD could occur. The findings of this study area summarized below.

- All the alternatives in the West Alderwood Segment have potential for joint development and TOD on surplus properties with TOD supportive zoning in the immediate area.
- Both of the Ash Way Segment alternatives have potential for joint development and TOD near the stations, which are located in mixed-use zones.
- Both Mariner Segment alternatives have potential for joint development and TOD in their station footprint or nearby on surplus property located in mixed-use zones.
- The State Route (SR) 99/Airport Road Segment alternatives are situated in mixed-use zones in Everett and unincorporated Snohomish County and have the potential for joint development or TOD on surplus land.
- The SW Everett Industrial Center Segment alternatives have little to no TOD or joint development potential since both alternatives are located entirely within the Paine Field/Boeing Everett Manufacturing and Industrial Center, which restricts land uses that are not compatible with the industrial character of the center.
- In the SR 526/Evergreen Segment, Station EGN-B and Station EGN-E have some potential for joint development and TOD near the stations, which are located in mixed-use zoning that supports TOD. Station EGN-A has some potential for joint development, but existing development and single-family zoning to the west restrict the potential for TOD on surplus parcels.
- The Everett Station Segment alternatives are all located in TOD supportive mixed-use zones that allow high-density development, which could support joint development and TOD on surplus parcels.

2.3.2 OMF North

OMF North would provide Sound Transit with additional capacity for an expanded fleet of light rail vehicles, which would allow for more efficient operations of existing and future expansions of the light rail system than would occur without the facility. Improved light rail transportation service serving Snohomish County could result in increased convenience and desirability of surrounding residential, commercial, and office properties. This may help advance parts of the local jurisdictions' subarea and comprehensive plans, which include goals of increasing high-capacity transit and TOD.

While surrounding properties may experience proximity impacts related to the construction and operation of OMF North due to noise, visual, and air quality impacts, it is not expected that

those impacts would result in alteration of existing or potential future land uses. A study by an Urban Land Institute Advisory Services Panel addressed common concerns related to the effects of light rail transit maintenance facilities on air quality, pollutants, nighttime activity, noise, light, and aesthetics. The study concluded that these concerns are likely unfounded for modern light rail maintenance facilities, which produce less noise than traditional train yards, and because light rail vehicles run on electricity and produce no emissions. The report suggests that light and aesthetic concerns can be addressed through thoughtful design and points to several examples of well-designed OMF sites that are compatible with the surrounding land uses (Urban Land Institute 2014).

2.4 Economics

Indirect economics impacts could be beneficial or adverse. Increasing economic activity in and around commercial and industrial areas may increase traffic congestion and development. The project would likely bring more dense and mixed-use land uses to station areas consistent with adopted land use plans, which could result in increased economic activity, increased development and redevelopment potential of surrounding properties, and increased property value of parcels near the stations. The project would also bring high-capacity transit opportunities and connections to new transportation corridors and increase access to locations around the region, especially for those who use transit as a primary means of transportation.

Several studies have shown that properties near light rail stations tend to experience an increase in value, surpassing similar properties that are not located near these stations (Transportation Research Board 2004; Nelson 2017). This is especially true when there is pedestrian infrastructure added (Bartholomew and Ewing 2011). Additionally, the combination of proximity, density, mixed-uses, and a pedestrian-friendly environment often leads to gains in property value and improved performance in the real estate market (Transportation Research Board 2004). Moreover, the taxes collected from new construction around these station areas, made possible by light rail access, could potentially increase property tax assessments in the project vicinity in the future.

As the EVLE Project expands light rail access to the area, the convenience, visibility, and desirability of the surrounding residential and commercial properties would increase near stations. In addition, heavier pedestrian activity near surrounding stations and important nodes of economic activity would increase the number of potential customers to retail businesses in the area and synergy between businesses, which occurs when individual businesses benefit from clustering near each other, allowing customers to shop more efficiently. Convenient light rail access might also attract more employees who are interested in using public transportation instead of other modes such as driving. Also, taxes on incremental new construction around station areas enabled by light rail access might increase property tax assessments in the immediate project vicinity in future years.

The EVLE Project could also result in adverse effects to surrounding properties along the study area. Adverse effects could include impaired road access and traffic flow changes or restrictions, decreased parking, noise increases, and impaired visibility that could reduce patronage of a business. Indirect displacement might occur as a result of new development patterns that increase rents or saturate the local market area with similar businesses, drawing away sales from existing businesses. Noise and reduced visibility would have to be noticeably greater than what currently exists for decreases in business patronage and property values to be expected. The Transportation, Visual and Aesthetic Resources, and Noise and Vibration

Technical Reports describe these issues in more detail (all of which are available in Draft EIS Appendix G).

2.5 Social Resources, Displacements, and Relocations

Light rail facilities could indirectly impact social resources, community facilities, and neighborhoods by changing neighborhood composition or character over time. The manner in which a neighborhood changes in response to new light rail facilities could impact community cohesion beneficially or adversely. The project may encourage redevelopment in station areas (TOD) or the completion of missing transportation links, such as bicycle facilities, sidewalks, or trails. Station area improvements could provide new meeting places for nearby residents and employees, improving community cohesion. Station area redevelopment could promote economic activity by expanding neighborhood business districts consistent with zoning and could increase property values (refer to the Economics Technical Report in Draft EIS Appendix G.4 for information on potential economic impacts and benefits). Increased property values could cause higher rents and property taxes, which could have an adverse effect on existing renters, homeowners, and business owners, resulting in some moving away from the neighborhoods. Light rail facilities that are not close to stations could also adversely affect property values.

2.6 Visual and Aesthetic Resources

The EVLE Project could indirectly result in changes to nearby land uses in station areas, as allowed by zoning, and some parcels initially acquired for a project use, such as construction staging, could be redeveloped to accommodate TOD. Impacts to visual quality from these land use changes could be experienced by sensitive viewers along the EVLE Project corridor in the future (e.g., if a forested site were cleared of trees for a housing development). Each jurisdiction has developed a future land use plan to guide its growth and development activities over the next several years, as detailed in the Land Use Technical Report in Draft EIS Appendix G.3. This report also discusses potential indirect impacts associated with TOD.

2.7 Air Quality

Indirect air quality impacts from light rail projects are typically associated with the power generation that supplies the electricity used in vehicle operation. Sound Transit has an agreement with Snohomish County Public Utility District to power the Link light rail system with non-emitting energy. In addition, the 2019 update to Sound Transit's *Sustainability Plan* (Sound Transit 2019) notes the agency's progress towards its ongoing goal of reducing energy use per passenger mile traveled. Sound Transit commits to increasing the energy efficiency of transit facilities and meeting higher green building standards and sets long term goals to transition further toward renewable energy sources. The *Sustainability Plan* sets a long-term target of providing a fuel-efficient and clean transit option for the Puget Sound region.

2.8 Noise and Vibration

Indirect noise and vibration impacts would include increased noise and/or vibration levels near the project that could be associated with TOD, typically traffic and construction noise and vibration. Any new developments would be required to meet the local noise regulations. Most

vehicle traffic and other sources of environmental vibration are below the levels of human perception and would not constitute an indirect impact.

2.9 Water Resources

Indirect impacts to water resources can result from the potential changes in land use, development patterns, and the movement of people as a result of light rail expansion. There are also land use and development opportunities lost when land becomes locked into one use and other options become unavailable or very difficult to pursue. For example, the OMF North would be designed to function for 100 years. While that facility may have multiple functions, it would remain an operations and maintenance facility for the next 100 years and would not be converted to a public park, business park, mitigation site, or any other potential use of urban land.

2.9.1 Surface Water

Where water crossings are replaced under the guideway, there would be a reduced incentive and greater cost barrier to fully restoring the stream. Full restoration could look like removing structures entirely and returning the stream to the surface. This is known as stream daylighting. The scale and cost of infrastructure being constructed means that any future attempts to more fully restore a stream (i.e., daylight the stream being conveyed by an underground structure) would be costly and perhaps impracticable due to proposed light rail infrastructure.

2.9.2 Stormwater

Washington's population is expected to grow from 7.7 million in 2020 to almost 9.9 million people in 2050 (Washington State Office of Financial Management 2024). The growth in population will increase both development demand and vehicle use in the state. By increasing access to light rail, the EVLE Project would reduce vehicular use in the region and, therefore, reduce vehicle-related stormwater pollutants.

Areas adjacent to light rail stations are expected to attract additional residents and increase development density. This would reduce development pressure and associated increases in stormwater runoff and impacts to water quality in undeveloped and lesser developed portions of the watershed. The redevelopment of existing impervious areas could improve water quality near light rail stations as new development projects would need to adhere to modern design standards and add improved stormwater management facilities.

Where impervious surface is proposed over existing impervious surface, there is no further impact to stormwater and infiltration. However, there is no longer the opportunity to remove impervious surfaces and restore natural stormwater infiltration patterns and the removal of pollutants naturally by soils and vegetation.

2.9.3 Floodplains and Floodways

Some streams being conveyed through water crossing structures under proposed light rail infrastructure could benefit ecologically from having a restored functional, non-regulatory floodplain. Restoring historically lost floodplains and riparian areas adjacent to these streams could be cost prohibitive once light rail infrastructure has been constructed over them. Where

the guideway is elevated, floodplain restoration activities would be more feasible than where guideway is at-grade.

2.9.4 Groundwater

Areas adjacent to light rail stations often develop and densify rapidly as the value of the land increases. Increases in development often lead to more impervious surface and less undeveloped land. This would decrease the amount of rainfall and stormwater naturally infiltrating into the ground and could reduce aquifer recharge, leading to lower groundwater tables.

2.10 Ecosystems

Indirect impacts to aquatic habitats, wetlands, and upland habitats for the EVLE Project are anticipated to be limited since the corridor is dominated by high- and moderate-density land uses, which have degraded the function of existing aquatic habitats, wetland ecosystems, and open space upland habitats within the project limits. Those indirect impacts reasonably expected to occur as a result of the project include an increase in impervious surfaces from the project structures resulting in a degradation of water quality and altering hydrology that could indirectly impact wetland and streams.

Proposed stream daylighting, stream realignment, and associated habitat restoration may provide beneficial indirect impacts through increased biofiltration, infiltration, and reconnection with shallow groundwater aquifers. The project would also not interfere with or prohibit future beneficial or habitat restoration projects expected to occur, including future Washington State Department of Transportation (WSDOT) fish passage projects at the Merrill & Ring Creek crossing with SR 526 and the Wood Creek crossing at Interstate 5 (I-5).

Additional indirect impacts to aquatic habitats, wetland ecosystems, and upland habitats that are expected to occur include changes to land use and economic development plans and policies that influence development types and patterns around stations and along the guideway. These plans are expected to develop further as the project design advances, but could reasonably be expected to increase the likelihood of redevelopment around the project, resulting in adverse and beneficial impacts to ecosystems and the species that use them.

2.11 Energy

No indirect impacts on energy would result from the project's operational energy consumption. Short-term indirect impacts related to upstream energy required for extraction, production, and transportation of materials for project construction are shown in Draft EIS Appendix G.11. Expansion of public transit is part of PSRC's TOD, a component of the Regional Growth Strategy outlined in PSRC's *VISION 2050* to attract a majority of population and employment growth to high transit areas (PSRC 2022). There is the potential for energy usage in the region to increase as population and employment opportunities near transit increase. However, there is also the potential for energy usage to decrease as increased attraction to residing and working near transit reduces the use of individualized transit modes that may consume more energy. Overall, public transit expansion projects may lead to increased growth in population and employment but may offset potential energy consumption increases by offering a more energy efficient transit option (ScienceDirect 2022).

2.12 Geology and Soils

Indirect impacts from the project could result from permanent soil anchors or tiebacks that may be used in retaining wall structures. These wall support systems could restrict the type of excavation feasible for any future development considered within the anchor zones. Improper erosion control could lead to uncontrolled sedimentation to area waterbodies and indirect impacts to aquatic life.

2.13 Hazardous Materials

Indirect impacts from the alignment and station alternatives and OMF North site alternatives may arise if construction of foundations or utilities results in altering migration pathways. Based on the location of contaminated sites relative to the alignment, indirect impacts from construction are anticipated to be minimal.

Within station areas, the Build Alternatives could encourage TOD or station area development, including on properties that have past contamination. If existing contamination is addressed responsibly during development, the development activities would likely result in an improvement to the environment.

2.14 Electromagnetic Fields

No indirect electromagnetic field (EMF) impacts are anticipated based on consideration of the existing EMF environment, a review of planned future developments in the vicinity of the EVLE Project, and the likely EMF characteristics of these future developments.

2.15 Public Services, Safety, and Security

The project would not lead to unplanned or induced increase in the population of Lynnwood, Everett, or Snohomish County, and would be unlikely to cause an increased demand for public services beyond those already planned. There could be a redistribution of some populations and employment growth to areas adjacent to new stations, which is consistent with city, county, and regional plans. For more information on changes to populations and areas surrounding stations, see the Land Use Technical Report in Draft EIS Appendix G.3.

The OMF North site alternatives could have indirect impacts to their respective study areas, including changes in development patterns that could affect the need for additional public services. The Land Use Technical Report in Draft EIS Appendix G.3 contains a more detailed description of land use changes in addition to development potential consistent with local and regional policies and plans.

2.16 Utilities

Improved transit access from EVLE would support planned TOD or redevelopment near the stations. This increase in population and development would also likely increase demand for utility services in some areas surrounding stations. The project corridor is within the urban growth boundaries of Lynnwood, Everett, and Snohomish County, and development near the project would not be denser than allowed within the adopted land use plans. Increased

development and associated utility demands within these areas are addressed by city and county plans. Therefore, adverse indirect impacts on utilities are not expected to occur due to the EVLE Project. See the Land Use Technical Report in Draft EIS Appendix G.3 for more details on the indirect impacts related to land use development.

2.17 Historic and Archeological Resources

Construction of the EVLE Project could encourage population growth and TOD in the station areas. Potential indirect effects could include private developers demolishing or substantially altering historic properties for redevelopment. Future redevelopment in station areas would be consistent with adopted zoning and comprehensive plans. Any changes in zoning by the cities or county could result in redevelopment of historic properties and long-term alteration to the scale and character of neighborhoods, which could have indirect impacts on historic properties. Redevelopment also has the potential to disturb archaeological resources.

2.18 Parks and Recreation Resources

Sound Transit analyzed the potential indirect impacts of the EVLE Build Alternatives on parks and recreational resources in the study area. If a recreational resource or alternative is not mentioned, no impact would occur for that resource or alternative.

Indirect impacts during the operational phase could include changes in the nature of surrounding land uses, increased noise and/or vibration near resources of concern, or a general increase in the level of activity near stations that could affect the continued use of the specific park or recreational resource.

2.18.1 Indirect Impacts Common to All Build Alternatives

The project would improve public transportation access to parks and recreation resources within the study area by providing light rail transit to these resources, particularly those closest to new stations. Underutilized parks could experience activation as the parks continue to see increasing numbers of visitors. The resources most likely to experience increased accessibility due to people walking to the parks from the stations (those within a 10-minute walk from a station) are described for each segment below.

TOD that could occur around station areas is described in the Land Use Technical Report in Draft EIS Appendix G.3. Development around station areas would be consistent with City of Lynnwood, City of Everett, and Snohomish County planning and zoning regulations. TOD near station areas could increase use of the parks near the stations.

2.18.2 West Alderwood Segment

The Interurban Trail would have increased accessibility with all West Alderwood Segment alternatives. Stations ALD-D and ALD-F may also increase pedestrian activity to Pioneer Park and Trail.

2.18.3 Ash Way Segment

Due to their distinct locations on either side of I-5, the Ash Way Segment alternatives would increase access to resources that are on the same side of the highway as the station. Station ASH-A would increase accessibility to Oak Heights Elementary School's ballfield and playground and Hemlock Acres, while Station ASH-D would increase accessibility to the Interurban Trail.

2.18.4 Mariner Segment

Both Mariner Segment alternatives would increase pedestrian access to the Interurban Trail where it intersects with 128th St SW.

2.18.5 SR 99/Airport Road Segment

No parks or recreational resources would be indirectly affected by either alternative in the SR 99/Airport Road Segment.

2.18.6 SW Everett Industrial Center Segment

Station SWI-B is most likely to provide increased access to Kasch Park due to its proximity to Kasch Park Road, the one access point for the park. While Kasch Park Road is within a 10-minute walk from Stations SWI-A and SWI-C, it would require more time for pedestrians to travel along the road to access the park's main features.

2.18.7 SR 526/Evergreen Way Segment

All Build Alternatives in the SR 526/Evergreen Segment would increase access to recreational resources at Evergreen Middle School, Emerson Elementary, Cascade High School, and Cascade View Park. Stations EGN-B and EGN-E would also provide increased pedestrian access to Horizon Elementary's recreational infrastructure.

2.18.8 Broadway/I-5 Segment

There are no stations in the Broadway/I-5 Segment to provide increased access to resources.

2.18.9 Everett Station Segment

Stations EVT-A and EVT-C would be the most likely to increase accessibility to James J. Hill Park. Station EVT-D would most likely provide increased access to North Middle School's athletics track and field and Clark Park; however, it would require acquisition and closure of James J. Hill Park.

2.18.10 OMF North

No parks or recreational resources would be indirectly affected by any of the OMF North sites.

3 CUMULATIVE IMPACTS

As described above, cumulative impacts could result from a project's incremental impact when added to other past, present, and reasonably foreseeable future actions. As part of the cumulative impacts analysis, Sound Transit gathered information from local agencies to identify impacts of past and present development actions and reasonably foreseeable future actions that could interact with the Build Alternatives, including:

- Adopted transportation plans, land use plans, and neighborhood plans from the City of Lynnwood, City of Everett, and Snohomish County.
- List of known major public and private land use proposals in the city of Lynnwood, city of Everett, and Snohomish County.
- Information provided by WSDOT, Community Transit, and Everett Transit on planned transportation projects and developments.
- PSRC *Regional Transportation Plan* (PSRC 2018) and *VISION 2050* (PSRC 2020), which provided population and growth projections, overall transportation goals for the Puget Sound region, and land use forecasts.

This information was used to identify past and present growth trends, characterize reasonably foreseeable actions, and evaluate cumulative impacts of the EVLE Project. Draft EIS Appendix C provides additional details on the actions considered in this analysis as part of the No Build Alternative, and Section 3.3 below identifies the reasonably foreseeable future actions (as of December 2024). These actions include larger public projects, which often have development documentation available, and private projects, where development information may be limited or not publicly available. Draft EIS Appendix G.1 provides information on travel forecasts, Draft EIS Appendix G.4 provides information on economic trends, and Draft EIS Appendix G.5 provides information on demographics.

Cumulative construction impacts were also analyzed, considering other construction projects likely ongoing at the same time, based on information available from local jurisdictions and WSDOT. Potential mitigation measures for these cumulative impacts (in addition to the mitigation described in Draft EIS Chapter 5 and Draft EIS Appendix G) are discussed in Section 3.5. An assessment such as this can reveal unintended consequences that might not be apparent when a proposed action is evaluated in isolation.

3.1 Geographic and Temporal Boundaries of Analysis

The environmental effects of past and ongoing actions were considered in relation to the natural and built environment. The development actions considered for this analysis were the following:

- **Past actions** include non-native settlements dating back to the 1800s and continuing trends in development patterns up to the present.
- **Present actions** are those projects by private developers or local, state, or federal agencies just completed or under construction.
- **Reasonably foreseeable future actions** are those that have obtained some local, state, or federal government approval and thus could be under construction at any time from the present through 2046 (the EVLE Project's horizon year or the year all components of the project would be open).

The study area for this analysis was a combination of the study areas defined in Draft EIS Appendix G.1 for transportation facilities and Draft EIS Appendices G.2 through G.18 for the various environmental resources, which included likely areas for construction impacts.

3.2 Past and Present Actions

Coast Salish people lived in the region long before the arrival of non-indigenous settlers, living in permanent villages along the saltwater shorelines, rivers, and tributaries. Non-indigenous settlers started to arrive in the Puget Sound area in the 1850s. Since the mid-19th century, ongoing impacts from past actions have shaped the project vicinity. The city of Lynnwood, city of Everett, and Snohomish County have become increasingly urban over time with much of the development occurring in the areas now known as Lynnwood and Everett and adjacent to SR 99 and SR 526. Past and present regional and local planning efforts have emphasized an integrated, long-range growth-management, economic, and transportation strategy based on a vision of high-density, urbanized centers linked by a high-quality, multimodal transportation system that includes light rail. The following sections summarize how the natural and built environments in the project area have changed over time. For more detail, see Draft EIS Appendix G.17.

3.2.1 Natural Environment

Much of the study area is urbanized but was originally largely forest, swamps, and creeks. The study area crosses both the Cedar-Sammamish watershed and the Snohomish watershed. The Cedar-Sammamish watershed, made up of the Swamp Creek and North Creek subbasins, has been heavily modified by residential, commercial, and industrial land uses. The study area's wetlands and aquatic and riparian habitats that were once an extension of the Swamp Creek floodplain (King County 2001) have been impacted over time by surrounding land uses, stormwater management practices, and transportation infrastructure. Vegetation has been substantially altered or completely removed and replaced by impervious surfaces, including major interstate and state highway infrastructure, and industrial, commercial, and residential development. The Snohomish watershed has been heavily impacted by commercial and industrial development, in particular the construction of Seattle Paine Field International Airport (Paine Field), the Boeing Everett Production Facility, and other industrial, commercial, and residential areas. Other past actions affecting the natural environment included timber harvesting, natural resource extraction, lumber and paper mills, farming, and railroads.

The wetlands now present in the study area represent fragments of larger historical wetland systems, and some are more recently formed wetlands that have developed as a result of changes in transportation, land use, and surface water drainage patterns. The Swamp Creek subbasin has the largest forested wetland in the EVLE corridor at 118-acres with other fragmented wetlands located along the corridor, particularly adjacent to SR 99 and SR 526.

Streams in the study area have been historically altered by channelization and piping with many streams being replaced with a complex network of culverts and stormwater drainage infrastructure. The industrial and urban development in the study area, including Paine Field and the Everett Boeing Production Facility, has imparted a legacy of contamination, as with most of these types of land uses historically in the U.S. Urbanization has resulted in hydrologic changes, such as decreased base flow and aquifer recharge during summer months and increased seasonal flow fluctuations and flooding during periods of heavy rain as compared with predevelopment conditions. The development has also impacted water quality by introducing

runoff contamination from pollution-generating impervious surfaces as well as increasing water temperatures resulting from the removal of vegetation that previously provided shade along stream banks.

Due to the developed nature of the study area, most of the vegetation present reflects landscaping practices for urban and suburban areas, with remnant tree canopy retained for shade or aesthetics. The largest remaining native forest in the study area is located in the Swamp Creek riparian corridor to the west of I-5 just north of Lynnwood.

3.2.2 Built Environment

After indigenous people were assigned to reservation land with the Treaty of Point Elliot in 1855, early settlers arrived in Snohomish County to engage in agricultural, logging, mining, and industrial activities. The Everett area was a desirable location for logging due to its old-growth trees (Riddle 2006). The gold rush and the prospect of railroads extending to Everett convinced investors to develop the area. In 1893, the City of Everett was incorporated (Everett Station District Alliance 2021). By the 1900s, Everett's economy was booming with lumber and shingle mills, iron works, ship building establishments, a brewery, flour mill, and a cannery (Riddle 2006). With the construction of SR 99 between Seattle and Everett in 1927, more people traveled to the area, and SR 99 became the commercial corridor of southwest Snohomish County.

During World War II, Everett became a hub of wartime production. Boeing operated two airplane assembly plants in Everett, and Paine Field was converted to a military base (Riddle 2006). Post-World War development was heavily influenced by the aerospace industry and the interconnectivity of personal automobiles and accompanying transportation construction measures, such as the construction I-5 from Everett to Seattle. The City of Lynnwood was incorporated in 1959 (City of Lynnwood 2011). In 1965, Boeing became Snohomish County's largest employer (O'Donnel 1993) and continued to see growth in their workforce and facilities. In 1969 construction of SR 526, also known as the Boeing Freeway, was completed to connect Boeing and Paine Field to I-5.

In the five decades since the completion of I-5 and SR 526, industrial and commercial development has grown steadily along much of this corridor. Employment in the area encompasses a variety of industries and business sectors, including retail, food service, light industrial, and aerospace-related businesses.

3.3 Reasonably Foreseeable Future Actions

For purposes of this analysis, reasonably foreseeable future actions were defined as projects that could produce environmental impacts that could add or interact with the project, regardless of the agency, organization, or person proposing the action. They are reasonably likely to occur based on being funded, approved, or under consideration for regulatory permitting; undergoing environmental review under the National Environmental Policy Act (NEPA) or SEPA; or part of an officially adopted planning document or publicly available development plan.

Reasonably foreseeable future actions relevant to the project were identified by reviewing numerous plans, proposals, developments, and NEPA or SEPA documentation from Washington WSDOT, PSRC, Sound Transit, local jurisdictions, and private developers as of December 2024. The projects include privately funded residential, institutional, and commercial

developments within the study area. Generally, reasonably foreseeable future actions are anticipated to continue the pattern of increasing residential and employment density of the analysis area. These reasonably foreseeable future actions were considered in the analysis of cumulative effects under SEPA.

Figure J-1 through Figure J-5 show the general location of the reasonably foreseeable future actions identified in the study area. Table J-1 lists these projects. No reasonably foreseeable future actions were identified in the SW Everett Industrial Center, SR 526/Evergreen, or Broadway/I-5 Segments.

Figure J-1 Reasonably Foreseeable Future Actions – West Alderwood Segment

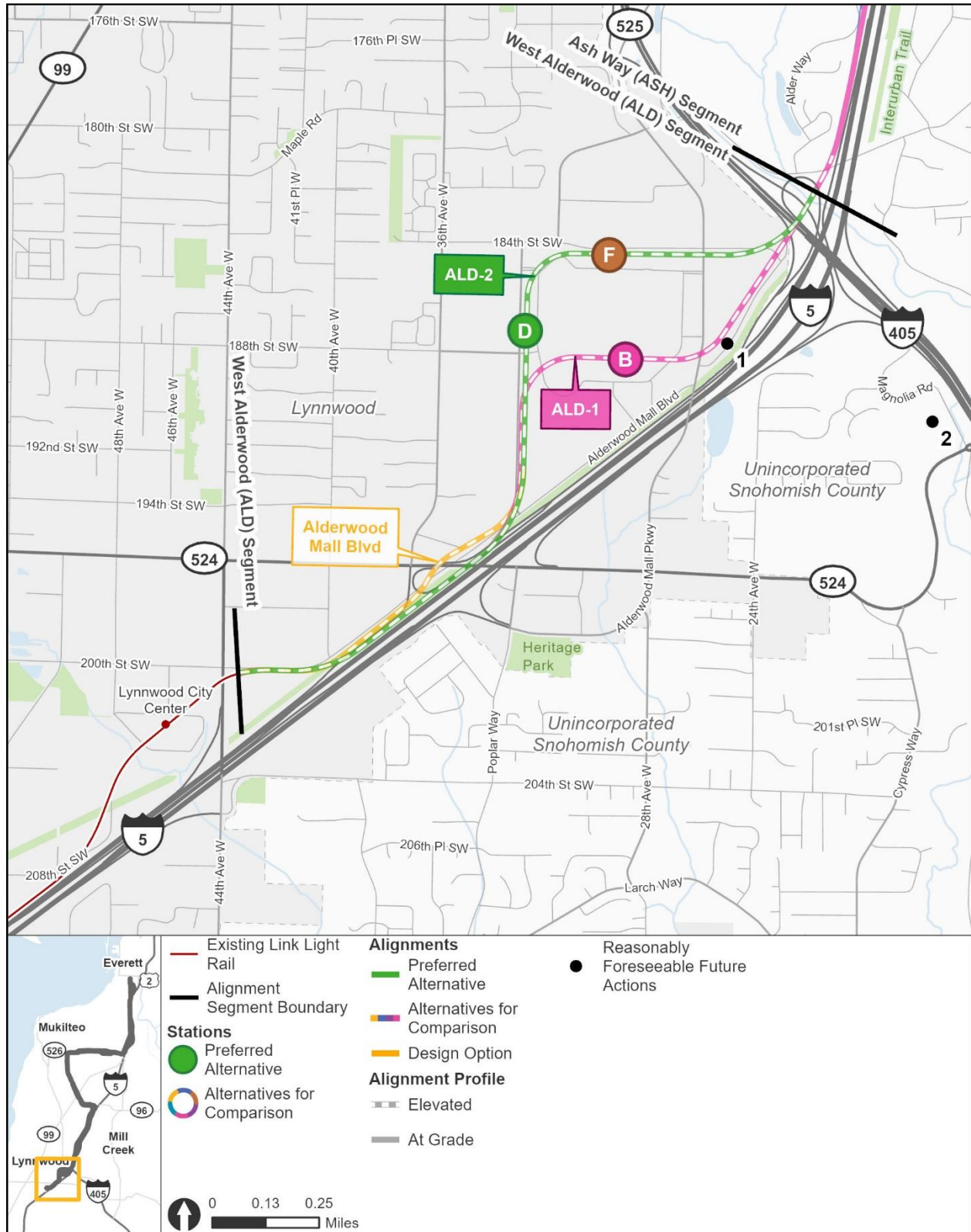


Figure J-2 Reasonably Foreseeable Future Actions – Ash Way Segment (South)

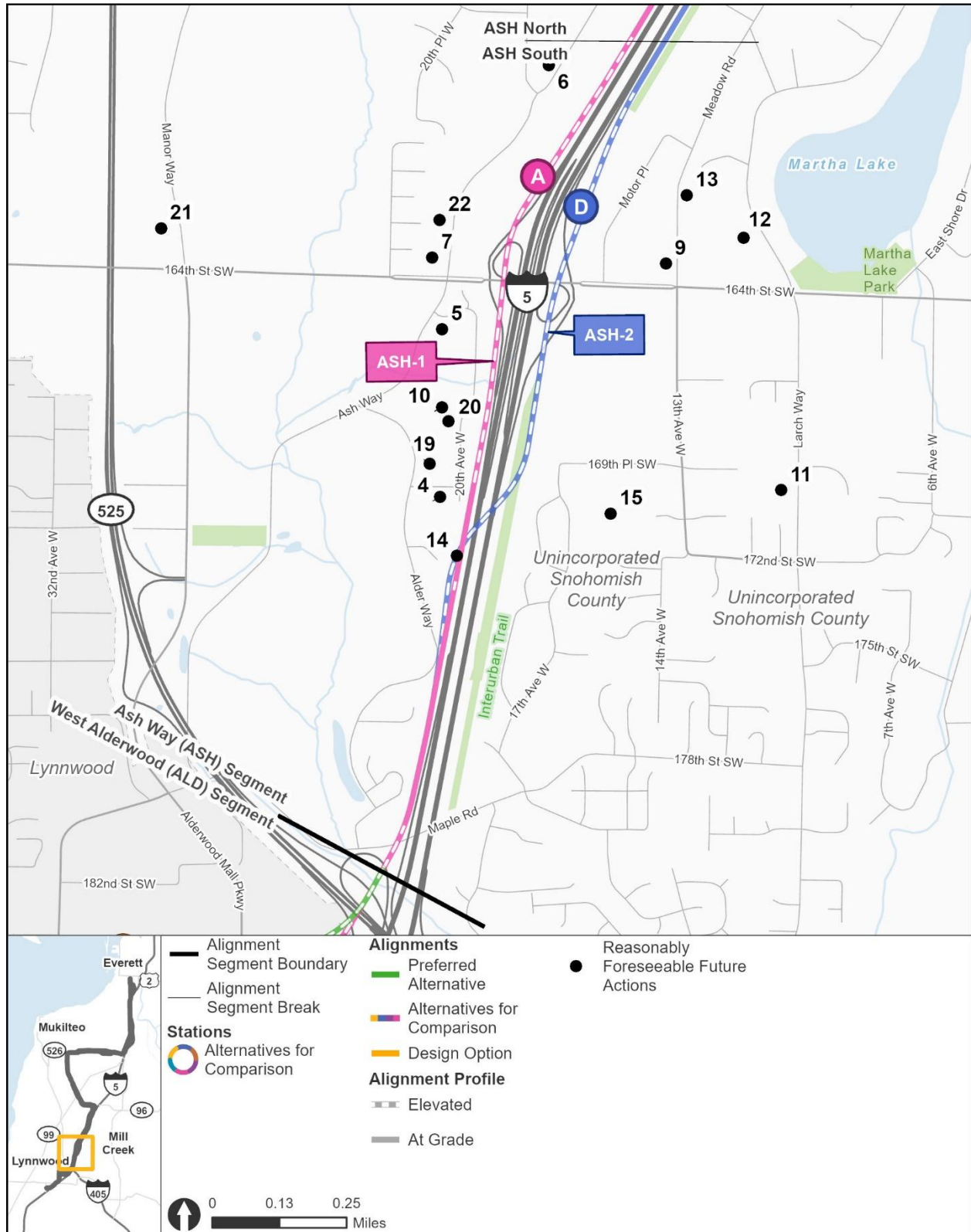


Figure J-3 Reasonably Foreseeable Future Actions – Ash Way Segment (North)

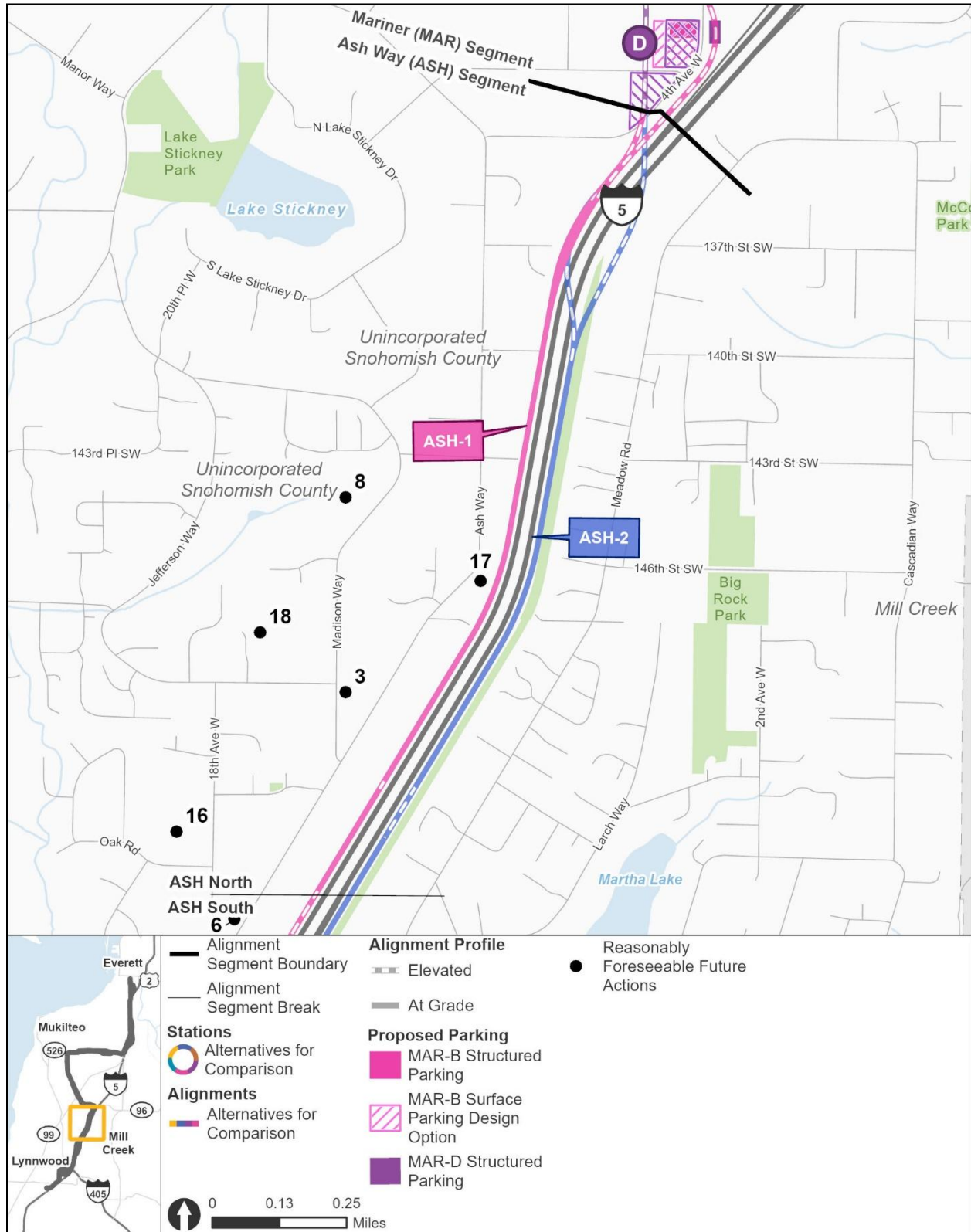


Figure J-4 Reasonably Foreseeable Future Actions – Mariner and SR 99/Airport Road Segments

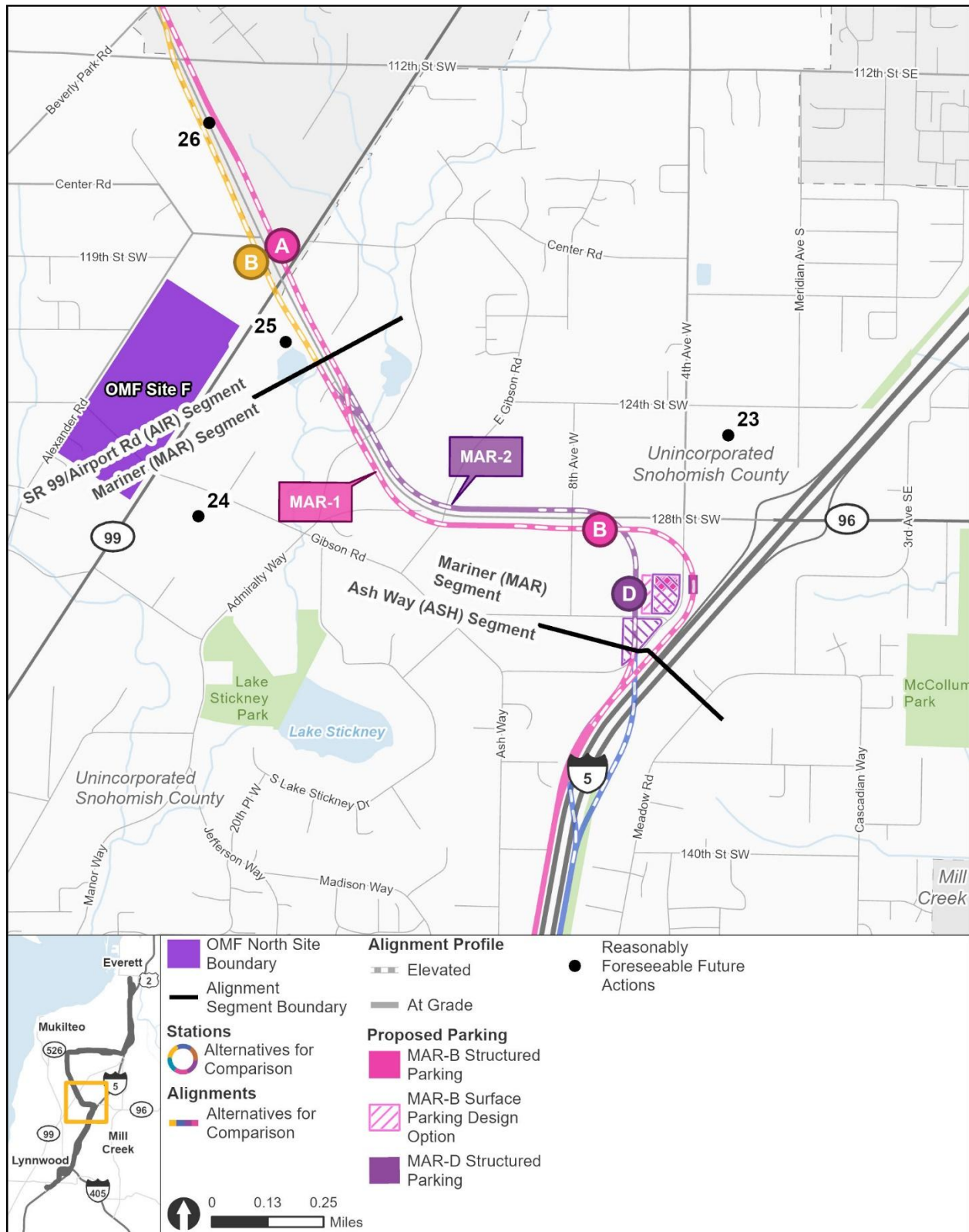


Figure J-5 Reasonably Foreseeable Future Actions – Everett Station Segment



Table J-1 Reasonably Foreseeable Future Actions

Project ID	Project	Address	Jurisdiction	Description
1	iVista @ Alderwood	18631 Alderwood Mall Parkway	Lynnwood	20-story mixed-use building with 362 residential units, amenities, parking, and retail
2	Lono Development	1700 Magnolia Road	Snohomish County	16-unit townhome development
3	15200 Ash Way Townhomes	15200 Ash Way	Snohomish County	36-unit townhome development
4	Alder Way Townhomes	17119 Alder Way	Lynnwood	45-unit townhome development
5	Allegro at Ash Creek	16525 Ash Way	Lynnwood	126-unit residential development
6	Amil Ash Apartments	15714 Ash Way	Lynnwood	131-unit residential development
7	Ash Way Fieldstone Senior Living	2027 164th Street SW	Lynnwood	Assisted living facility
8	Bruntsfield ULS	14424 Madison Way	Snohomish County	72-lot single family residential development
9	Green Hill Apartments	16224 Meadow Road	Snohomish County	48-unit apartment building
10	Harmony Village at Lynnwood	16725 Ash Way	Lynnwood	118-unit townhome development
11	Larch Way Estates SFDU	17000 Larch Way	Lynnwood	20 single family detached units
12	Larch Way Townhomes ULS	16210 Larch Way	Lynnwood	37-unit townhome development
13	Meadow Road Townhomes	16109 Meadow Road	Lynnwood	13-unit subdivision
14	Moksha Townhomes	Adjacent to 2014 171st Place SW	Lynnwood	12-unit townhome development
15	MSR Twin Oaks 2	Adjacent to 1323 170th Place SW	Lynnwood	41-unit subdivision
16	Oak Heights Elementary	15500 18th Avenue	Lynnwood	Construction of a new school, exterior parking, site access, and playfields
17	Redford Townhomes	14623 Ash Way	Lynnwood	18-unit townhome development
18	Springbrook Lane SFDU	14911 17th Place W	Lynnwood	21-unit single family detached unit (SFDU) development
19	Starling Apartments	16923 Alder Way	Lynnwood	88-unit apartment building
20	The Alder	16816 20th Avenue W	Lynnwood	72-unit townhome development
21	Wisteria Park TH ULS	2829 164th Street SW	Lynnwood	125-unit townhome development

Project ID	Project	Address	Jurisdiction	Description
22	Lynnwood Senior Housing	16216 Ash Way	Lynnwood	Senior housing development
23	Donati	296 124th Street SW	Snohomish County	59-unit townhome development
24	The Pines ULS	12812 Avondale Way	Everett	134-unit lot subdivision
25	Heritage/Ovation at Paine Field	12121 Highway 99	Everett	222-unit senior affordable development
26	Marriot Dual Brand Hotel	11516 Airport Road	Everett	169-unit apartment building
27	AquaSox Stadium	Vicinity of Hewitt Avenue, Broadway, and Pacific Avenue	Everett	Outdoor multi-purpose stadium

3.4 Analysis of Cumulative Effects

Adverse and beneficial impacts could occur over the long-term during project operation, when impacts of the EVLE Project would add to or interact with long-term impacts of other past, present, and reasonably foreseeable future actions. Adverse impacts could occur during construction when activities necessary to build EVLE would add to or interact with impacts from other projects under construction at the same time. The following sections discuss expected cumulative impacts of project construction and operations on elements of the environment. Because analyses of transportation, air quality, and economic impacts cannot be isolated from influences outside the EVLE Project, they inherently include impacts of other projects and processes.

The operational and construction impacts of the project that could contribute to cumulative impacts are discussed in Draft EIS Chapter 3 and Draft EIS Appendix G. This includes long-term impacts related to transportation, visual and aesthetics, noise, ecosystems, and historic resources as well as construction impacts. Avoidance, minimization, and mitigation measures for operational and construction impacts, which would also address cumulative impacts, are also discussed in Draft EIS Appendix G.

Operation of EVLE would shift some vehicle trips to light rail transit, thereby reducing demand on traffic and bus transit movement, improving air quality, water quality, and energy consumption compared with future conditions projected under the No Build Alternative. Therefore, a key contribution of EVLE, once in operation, would be to reduce impacts on these resources.

The SW Everett Industrial Center Station would be the terminus for the initial phase of the project, as described in Chapter 2. Project construction impacts could occur twice in this area, once with construction of the initial phase and again with the full build of EVLE into downtown Everett. OMF North would be constructed by 2034 in either the full build or initial phase scenarios.

3.4.1 Transportation

The analysis of the No Build Alternative and the Build Alternatives for operational transportation impacts is inherently cumulative because it is based on regional forecasts that assume future funded projects and future growth in population and employment located in designated growth centers and consistent with adopted land use plans. However, transportation impacts may be different based on how EVLE impacts interact with other individual transportation or development projects and the actual rate and timing of population or employment growth in a given community.

During the construction period, EVLE may add to and interact with construction impacts from other transportation and development projects being built at the same time. Construction in or near roadways typically requires temporary lane closures, parking restrictions, detours, and traffic delays. Interactions among two or more concurrent construction projects can intensify these impacts.

3.4.1.1 Regional Transportation

Based on the latest state, regional, and surrounding local agencies' transportation plans, several transportation projects were assumed to have been constructed by 2046, and therefore were included in the transportation analysis. These projects include major improvements such as the I-5/44th Avenue Interchange Improvements Project, Poplar Extension Bridge, SR 526 Corridor Improvements, and other projects listed in Draft EIS Appendix C.

Sound Transit and WSDOT have continued to coordinate on regional transportation since development of their October 23, 1997 Memorandum of Understanding, with the goal of establishing a cooperative relationship for the construction, ownership, and operation of high-capacity transportation capital facilities. WSDOT could continue to implement lane management strategies, such as express tolled lanes or High Occupancy Vehicle (HOV) designations along the highway system. Depending on how lane management strategies are administered, managed lanes could improve travel conditions on the highway system for some travel modes. However, WSDOT has no specific plans at this time to implement large scale lane management strategies on I-5 adjacent to the EVLE corridor beyond the current 2+ HOV lane designation on the inside travel lanes in both directions.

Together with EVLE, the reasonably foreseeable future projects would result in benefits to regional transportation by shifting some vehicle trips to light rail transit and improving travel conditions in the area through capacity and access improvements. Draft EIS Appendix G.1 shows the projected 2046 daily transit ridership for the No Build and Build Alternatives in the EVLE corridor as well as the expected daily ridership and change in the number of new transit riders with the Build Alternatives.

3.4.1.2 Transit

Future regional transit projects could have an impact on light rail ridership. Sound Transit's *Regional Transit Long-Range Plan* includes a potential light rail corridor from Everett Station to north Everett (Sound Transit 2014). Sound Transit 3 (ST3) included funding for light rail extensions to Redmond, Tacoma, Kirkland, and Issaquah as well as additional destinations within Seattle (Sound Transit 2016). If voters were to approve funding for construction of additional transit extensions, transit accessibility for the communities in the EVLE corridor would be increased through connections to additional regional destinations. Community Transit and Everett Transit have adopted long-range plans that propose changes to bus service in their

respective service networks. Sound Transit has coordinated with these agencies in designing locations for EVLE stations. If fully implemented, the transit agency plans would include expansions to communities in the EVLE corridor and could increase overall light rail ridership. This would be a beneficial cumulative impact as people are able to travel more easily throughout the region.

3.4.1.3 Arterial and Local Streets

As stated in Section 3.4.1, the analysis of future transportation impacts in Draft EIS Appendix G.1 is a cumulative analysis based on the results of traffic and ridership modeling that incorporates funded and approved actions as well as projected growth that would include development in the region. Other planned, but not funded, regional and local transportation and development projects could have some impacts on vehicular travel patterns within the study area, including traffic operations near the EVLE stations. Future development could include TOD around stations, which would likely increase the number of people walking or biking to stations. Future transit and roadway projects could also improve capacity, traffic flow, and circulation on local traffic operations. The construction timeline for the I-5/164th Street SW and 128th Street SW/Airport Road projects could potentially overlap with construction of the EVLE alignment in the Ash Way and Mariner Segments. These two projects include new crossings over I-5 in the vicinity of the Ash Way and Mariner Stations, and if construction occurred simultaneously, the cumulative impact would be additional impacts to traffic accessing I-5 on 164th Street SW and 128th Street SW.

3.4.1.4 Parking

Existing parking within the EVLE corridor could be affected by other land use and transportation facility changes. Transportation projects that increase roadway capacity (e.g., adding lanes or changing intersection light timing) or multimodal options (e.g., Swift bus rapid transit), as well as increased residential and commercial development activities near station areas, could increase parking demand within the EVLE corridor. These actions could also reduce on- and off-street parking supply. Current plans for local development near EVLE station areas, including the *Lynnwood City Center + Alderwood Subarea Plan* and *Metro Everett Subarea Plan*, would encourage TOD around future stations (City of Everett 2020, City of Lynnwood 2025b). The Everett Outdoor Event Center would also be constructed near an EVLE station, in the vicinity of Pacific Avenue and Broadway in downtown Everett, and could increase the demand for parking near Everett Station. Parking demand generated by new development near EVLE station areas would be accommodated by developers, and the need for that parking would be assessed based on local jurisdictional parking regulations and requirements. The cumulative impact of these changes with EVLE could increase the demand for parking in the station areas. However, the EVLE Project would also provide an alternative travel option to access the station areas without needing to park, and additional parking would be constructed at Mariner and Everett Station as part of the project.

3.4.1.5 Nonmotorized Facilities

Future nonmotorized projects, including constructing missing sections of the Interurban Trail, could add more pedestrian and bicycle trips to the street network surrounding the EVLE stations. These future projects could also improve sidewalks, trails, and other nonmotorized facilities within the EVLE study area, either as other properties are developed and redeveloped or as the result of future projects by the local jurisdictions.

Sound Transit has initiated coordination with local jurisdictions to identify a preliminary list of pedestrian and bicycle improvements to support EVLE station access as part of the Station Access Allowance Program. This preliminary list of nonmotorized improvements will continue to be refined in the future, incorporating comments from Tribes, agencies, and the public. Some of the nonmotorized improvements may be implemented by others such as the City of Lynnwood, City of Everett, Snohomish County, WSDOT, or others as lead agencies and require multi-agency funding partnerships to implement. Some of the Station Access Allowance projects are expected to receive funding as part of the Station Access Allowance Program under ST3 (Sound Transit 2016) and once implemented would provide a benefit to safety and would improve pedestrian and bicycle travel in the EVLE corridor.

3.4.1.6 Safety

The future safety impacts under the No Build and Build Alternatives include reasonably foreseeable transportation projects. Sound Transit has coordinated and continues to work with local jurisdictions to help ensure safety around proposed stations. Other development would not likely affect safety in the EVLE study area. No cumulative safety effects are anticipated.

3.4.1.7 Aviation

The *Paine Field Master Plan 2040* (Snohomish County 2024a) includes recommendations for future airfield reconfigurations and support facility and passenger terminal expansion to provide increased commercial air traffic at Paine Field, which would result in increased vehicle traffic accessing the passenger terminal. The EVLE Project would also add vehicle trips from both cars and buses accessing the station; however, some single-occupancy vehicle trips to the airport may shift to transit when light rail service begins. These changes are not anticipated to result in cumulative impacts on aviation.

3.4.1.8 Freight

As described in Draft EIS Appendix G.1, long-term travel impacts on freight mobility and access within the EVLE study area would be mitigated with the measures identified for arterials and local streets. None of the Build Alternatives would have additional long-term impacts because the light rail guideway would operate in its own right-of-way, and other traffic impacts related to bus or vehicular trips to stations already include the effects of continued urban growth and development. No cumulative transportation effects on freight mobility and access are anticipated in the context of other area improvements described above.

3.4.2 Acquisitions, Displacements, and Relocations

Several other public projects planned in the vicinity of EVLE could result in additional property acquisition. The Everett Outdoor Event Center would be constructed in the vicinity of Pacific Avenue and Broadway in downtown Everett and could increase the property impacts on businesses in this area. Street widening projects, particularly along 128th Street SW and Airport Road, and other smaller public or private projects in the project vicinity could also acquire new properties and displace existing uses.

An adverse economic cumulative impact from property acquisition is not expected because Sound Transit would compensate affected property owners in accordance with Sound Transit's Real Estate Property Acquisition and Relocation Policy, Procedures, and Guidelines (Sound Transit 2017). Benefits would depend on the level of impact, available relocation options, and other factors. In addition, Sound Transit supports potential TOD, which increases residential and

employment densities surrounding stations and is anticipated to provide more residential and employment opportunities than what is being displaced within the study area. However, these housing and economic opportunities generally occur after project construction so would likely not be immediately accessible to those displaced. Where appropriate, Sound Transit would facilitate TOD with local and potential development partners in accordance with Sound Transit's Equitable Transit Oriented Development Policy (Sound Transit 2018).

3.4.3 Land Use

EVLE, in conjunction with other land use actions by local governments and other property owners, could result in impacts on land use conditions due to local and regional plans that accommodate future population and employment changes.

Light rail would support more dense future development, particularly near planned light rail stations, which is consistent with local development regulations. EVLE, along with actions taken by jurisdictions, could help achieve local and regional planning goals that encourage high-density, mixed-use development. Land use changes are expected to be greatest near stations due to increased transit accessibility and pedestrian activity, which are generally attractive to businesses and residents. Such changes would depend on existing or amended land use regulations, including zoning designations, adopted by local governments and on the decisions of property owners about whether to develop or redevelop their property. No adverse cumulative impacts to land use are anticipated as EVLE is consistent with local and regional transportation and comprehensive plans.

3.4.4 Economics

The analysis of the No Build Alternative and the Build Alternatives for regional economic impacts is inherently cumulative. The analysis used PSRC data to reflect future regional and local activity, accounting for future changes in regional population, employment, and housing. Snohomish County Department of Property Taxes and Assessment's data and City of Everett, City of Lynnwood, and Snohomish County comprehensive and subarea plans were used to examine existing and future land use in the local area. Additionally, other known transportation projects were included in the analysis.

Investments in public transportation systems can benefit regional economies by helping offset increases in congestion and improving connections between businesses and the regional labor force. Many of the benefits associated with the project are embedded in the broader set of Sound Transit projects that would connect EVLE to the employment centers in Snohomish County and the broader Seattle metropolitan area. The proposed Build Alternatives associated with EVLE would support economic activity in the affected area.

WSDOT's SR 526 widening, SR 9 widening and interchange improvements, and I-5 interchange improvement projects, along with a number of local street widening projects, are anticipated to be constructed around the time EVLE construction is beginning. If these projects overlap, they would contribute to increases in the number of construction-related jobs available. The cumulative impacts related to job creation for construction-related work would be beneficial. However, availability of adequately trained construction workers may become limited for any and all of these projects, which could affect overall timing for Sound Transit or other projects.

All Build Alternatives are anticipated to require business and employee displacements through the acquisition of commercial and industrial properties. The Everett Outdoor Event Center would

be constructed in the vicinity of Pacific Avenue and Broadway in downtown Everett and could also have property impacts on businesses in this area. However, other reasonably foreseeable actions would not individually require large-scale displacements, as they would occur within existing rights-of-way or on private land. Planned private development projects would also increase the availability of residential, retail, industrial, and office space, as well as employment opportunities, within the project vicinity.

In aggregate, some of the potential cumulative impacts from multiple projects may be offset by applying the same impact minimization measures and best management practices identified in Draft EIS Appendix G.4, such as coordination with businesses during construction, marketing assistance, business advisory services, and signage to help patrons find businesses.

3.4.5 Social Resources, Community Facilities, and Neighborhoods

Cumulative impacts to these resources could be three-fold and are as follows.

Actions that occurred in the past, such as the development of the roadway and transit network within the study area, as well as implementation of prior land use plans, have resulted in the development patterns that shape the neighborhoods present in the study area. As a result of EVLE and other reasonably foreseeable transportation projects, commercial and residential development projects, and land uses changes, these neighborhoods could experience benefits. These benefits could include improved access to a regional high-capacity transit network, reduced travel time, residential infill, growth in employment base, and increased patronage of local businesses, especially in proximity to station areas.

Future development, particularly around station areas, could increase property values and taxes and may adversely affect the availability of affordable housing opportunities or affordable properties for small businesses. Affordable housing goals and policies adopted by the City of Everett, City of Lynnwood, and Snohomish County, as well as those adopted by Sound Transit, all encourage more housing options, including affordable housing, particularly near high-capacity transit. For example, Lynnwood's Comprehensive Plan includes the policy to "Implement zoning, regulation, and incentive changes near transit oriented development sites to guide sustainable and equitable development patterns that incorporate affordable housing and public amenities" (City of Lynnwood 2025a).

If EVLE is constructed at similar times as other large infrastructure projects, such as the Everett Outdoor Event Center and I-5 interchange improvements, residents and businesses could experience greater construction impacts than with just EVLE. This would be largely due to increases in local traffic congestion, access limitations, and noise, and concurrent construction activities might result in more complex and longer construction durations.

3.4.6 Visual and Aesthetics Resources

Construction of I-5 in the 1960s was a major change to the visual environment in the project corridor. The freeway and corresponding development along SR 99 and SR 526 also changed other more natural or rural landscapes. The addition of light rail to the project corridor would increase the visual prominence of linear transportation corridors.

Other projects, such as the Everett Outdoor Event Center or other large-scale private developments, that would be located in close proximity to the Build Alternatives could have cumulative impacts based on the visual presence of additional large structures. Although most

visual changes would occur in previously developed areas or adjacent to other existing large infrastructure, lessening the cumulative impact, EVLE and other reasonably foreseeable projects could increase the overall impacts on the surrounding visual environment in places.

If EVLE is constructed at the same time as other reasonably foreseeable actions, viewers could also experience more and longer visual change during construction. Cumulative visual effects could also occur with increased private development near stations.

3.4.7 Air Quality

The operational air emissions analysis for the Build Alternatives inherently considers the project in a cumulative context. The air quality analysis in Draft EIS Appendix G.7 finds that none of the Build Alternatives would result in an exceedance of the National Ambient Air Quality Standards. All the Build Alternatives are expected to result in a net decrease in criteria pollutant and GHG emissions within the project area due to reduced vehicle miles traveled.

The EVLE Project is part of Sound Transit's ST3 Plan (Sound Transit 2016), which extends light rail, commuter rail, and bus services and makes other transit improvements throughout the central Puget Sound region. As part of the ST3 planning process, Sound Transit conducted an analysis that found the ST3 system would reduce greenhouse gas emissions by more than 130,000 metric tons annually, or the equivalent of 14.6 million gallons of gasoline burned. Once completed, the entire Sound Transit system would save the region an estimated 793,000 metric tons of greenhouse gases per year, or the equivalent of 89 million gallons of gasoline burned per year (Sound Transit 2016). The EVLE Project in combination with reasonably foreseeable transit projects would reduce automotive vehicle miles traveled within the central Puget Sound region, thereby reducing petroleum consumption and GHG emissions in the area.

Temporary impacts to air quality and GHG emissions from construction of EVLE could add to construction impacts from other reasonably foreseeable projects. However, construction emissions would not be expected to exceed the National Ambient Air Quality Standards, and mitigation measures and best practices would minimize air quality impacts locally.

3.4.8 Noise and Vibration

The FTA-accepted methodology for operational noise and vibration analysis for both ambient noise conditions and vibration analysis reflects both ambient noise conditions and project-specific noise and vibration impacts. The FTA methods identify noise impacts and mitigation in the context of cumulative noise exposure that receivers would experience, based on existing noise levels in combination with new noise generated by the project. Therefore, no cumulative impacts related to noise would be expected beyond any impacts identified in Draft EIS Appendix G.8, which found that all noise impacts could be mitigated through a combination of noise barriers, changes to special trackwork, and residential sound insulation.

During construction, EVLE would generate elevated noise and vibration levels, and along with other nearby transportation and private development construction projects, cumulative impacts could occur. Although Sound Transit is committed to mitigating project noise impacts, light rail would still create a new noise source and therefore would contribute to noise in the project corridor.

Maximum vibration levels at any site are the result of heavy trucks on rough roads, light rail pass-by (where applicable), and local construction activities. Cumulative vibration levels in most

areas would be the same as the existing vibration levels in most cases. Exceptions to this would include areas with extremely rough roadways with potholes and other discontinuities that result in increased vibration levels from passing trucks and other heavy vehicles as well as areas near active construction sites, where short-term increases in vibration level would result from active construction equipment. No other reasonably foreseeable actions are expected to cause notable vibration impacts during project operation or construction, so cumulative vibration effects are not expected.

3.4.9 Water Resources

Although many of the reasonably foreseeable actions, as well as the Build Alternatives, would be built on developed sites or within existing paved rights-of-way, altogether these projects would increase the amount of impervious surfaces and associated stormwater runoff within the study area. However, new development and redevelopment are expected to bring many existing pollution-generating impervious surfaces up to current standards of flow control and water quality treatment for stormwater runoff. Through the replacement of these surfaces, improvements in stormwater runoff control and water quality would occur over time with or without EVLE. This would result in a net benefit for the hydrology and water quality within the study area.

3.4.10 Ecosystems

Past actions have greatly changed the ecological landscape in the study area and vicinity, and ongoing and reasonably foreseeable actions could contribute to additional impacts. To address the effects of past development, restoration programs and projects (e.g., aquatic and terrestrial habitat improvement projects, culvert replacement projects to eliminate fish passage barriers) are being planned and implemented throughout the region. The potential for the Build Alternatives to result in adverse cumulative impacts would be related to the direct impacts of the Build Alternative. In other words, a Build Alternative with a greater extent and/or intensity of adverse impacts on ecosystem resources would have a greater potential for adverse cumulative impacts.

There are some reasonably foreseeable actions that have the potential to result in benefits to the environment. For example, WSDOT and the Washington Department of Fish and Wildlife are working cooperatively to inventory and assess fish passage barriers on WSDOT facilities statewide. This inventory is part of a court-mandated comprehensive state program to address culverts blocking fish passage. Culvert replacement and retrofitting projects through that program may improve fish access to streams over time within the study area. Sound Transit is coordinating its light rail facility design with WSDOT to avoid conflicts with future culvert replacement projects.

3.4.11 Energy Impacts

EVLE is not anticipated to contribute to a cumulative adverse effect with respect to energy. Light rail vehicle miles traveled (VMT) and associated energy use would increase under the Build Alternative, but regional VMT for passenger vehicles and heavy-duty trucks are expected to lower under the Build Alternative, outweighing the energy used by light rail and thus reducing regional energy consumption overall.

3.4.12 Geology and Soils

EVLE would be within an urbanized area. In general, surface geology and soil conditions have already been substantially altered. The relatively small changes, including the reworking of soil, minor earthworks and grade changes, and minor changes to slope stability, would have little or no meaningful impact to existing, long-term geologic, hydrogeologic, or soils conditions and are not expected to result in adverse cumulative impacts when added to potential impacts from other reasonably foreseeable actions within the study area.

3.4.13 Hazardous Materials

Environmental regulations at both a state and a federal level require the identification and cleanup/removal of historical hazardous materials sites and remediation of hazardous materials when encountered. Any hazardous materials identified during evaluation of acquisitions or encountered during construction of all reasonably foreseeable projects would be cleaned up or remediated during project development or during future development projects. Thus, the cleanup of existing contaminated sites in the study area would be accelerated with the EVLE Project, and other future projects would need to follow the same protocols, which would result in a beneficial cumulative impact.

3.4.14 Electromagnetic Fields

As described in Draft EIS Appendix G.14, EVLE would not result in electromagnetic interference that might cause sensitive electronic equipment to malfunction, and the use of electricity to operate light rail is unlikely to generate health impacts for riders or people along the tracks.

An increase in employment and population along the project corridor could increase the demand for electrical power and could increase the number of sources and cumulative intensity of EMFs. It is possible that increased EMF strength from the light rail extension would affect the operation of sensitive equipment used within some residential, commercial, light industrial, or medical properties within the study area. However, the existing Link light rail system has been operating since 2003 with no known EMF-related issues in similar urban and suburban environments.

3.4.15 Public Services, Safety, and Security

Regional population growth has resulted in an increased demand for public services, which is expected to increase as the region continues to grow. EVLE would likely not add any unplanned growth in the area but would support planned growth. Existing services, such as police and emergency service providers, would continue to be available in the areas they currently serve, as well as any expanded services that may be added to accommodate planned growth within the area. Station design and security services along the light rail system would minimize crime incidents related to the project and would not contribute to a cumulative safety effect with other reasonably foreseeable future projects.

3.4.16 Utilities

Light rail service could encourage development of property in and around the project area, which could increase demand for utility services. However, local governments and public utilities have already accounted for this planned growth in adopted local land use plans and policies.

Development near the project would be consistent with what is allowed in adopted land use plans and current local development regulations. Therefore, the cumulative impacts on utilities would be negligible and in accordance with planned growth. Any increased need for utilities for the EVLE Project, such as electricity, would be addressed by Sound Transit by working directly with public utility providers.

3.4.17 Historic and Archaeological Resources

Build Alternatives within the West Alderwood, SR 526/Evergreen, Broadway/I-5, and Everett Station Segments and OMF Site F have the potential to adversely affect historic resources within the study area. The settings surrounding these resources have been altered by past and present redevelopment and general changes in uses surrounding them. The reasonably foreseeable actions in the project vicinity may have direct impacts on historic resources in the study area in addition to the EVLE impacts, as identified in Draft EIS Appendix G.17.

Incrementally, new infrastructure and development patterns have changed, and will continue to change, the historic setting of resources as a result of past and ongoing urbanization. Changes in zoning by the local jurisdictions could result in redevelopment altering the character of neighborhoods, which could impact historic properties. Because at least one historic resource would be adversely affected by the EVLE Project, the project would contribute to cumulative impacts on historic resources.

Redevelopment also has the potential to disturb archaeological resources. Incrementally, EVLE could contribute to a cumulative impact on archaeological resources. No eligible archaeological resources have been identified within the EVLE Project's area of potential effects; however, the project would have an Inadvertent Discovery Plan to address the potential discovery of archaeological resources during construction.

FTA, in consultation with the Washington State Historic Preservation Officer (SHPO), affected Tribes, and other consulting parties, will develop and execute a Section 106 Programmatic Agreement to resolve adverse effects. The agreement will identify parties responsible for complying with elements of the agreement and will outline mitigation measures for impacts to historic and archaeological resources. When combined with past, present, and foreseeable actions, and taking into account mitigation, the project would make a minor contribution to effects on historic and archaeological resources.

3.4.18 Parks and Recreational Resources

No new parks or recreational facilities are currently planned within the project footprint for construction at the same time as EVLE. Improvements to the Scriber Creek Trail in the city of Lynnwood are planned for 2045; however, EVLE would not interact with the project. There are also a number of improvements planned to the Interurban Trail prior to EVLE. The construction of these improvements may require closures or detours of the Interurban Trail, as would also occur with the construction of EVLE, impacting the use of the trail for a longer combined period of time.

No major additional changes to parks or recreational resources (including Section 6(f) and Recreation and Conservation Office properties) by EVLE or other reasonably foreseeable future projects or actions are anticipated. Population and employment growth are expected to occur under both the No Build and the Build Alternatives and would likely increase the use of parks and recreational facilities throughout the project area.

3.5 Potential Mitigation Measures for Cumulative Impacts

Operational cumulative impacts, particularly on transportation, visual and aesthetics, noise, ecosystems, and historic and archaeological resources, could occur. Avoidance, minimization, and mitigation measures for the EVLE Project operational impacts on these and all resources are discussed in Draft EIS Chapter 5 and Draft EIS Appendix G.

A majority of cumulative impacts would occur during project construction, rather than project operation, where the construction of other foreseeable actions could overlap with that of the EVLE Project. In most cases, mitigation would remain the responsibility of each project proponent to meet regulatory requirements for direct construction impacts on resources such as ecosystems, water resources, hazardous materials, and historic and archaeological resources. Sound Transit would coordinate as necessary with projects that would be under construction at the same time as the EVLE Project to minimize the potential cumulative impacts of overlapping construction periods within the same area. Such coordination would reduce cumulative impacts related to detours, temporary bus and trail reroutes, reduced access, increased dust and noise, vibration, hazardous materials, proximity impacts on visual resources, reduced emergency service response times, and temporary park and greenspace impacts.

4 GREENHOUSE GAS EMISSIONS

Washington has the goal of reducing overall greenhouse gas (GHG) emissions in the state to 95% below 1990 levels and achieving net zero emissions by 2050 (Revised Code of Washington [RCW] 70A.45.020), as well as decreasing the annual per capita VMT by 30% by 2035 and 50% by 2050 (PSRC 2020). The following section provides a quantitative analysis of the EVLE Project's impact on GHG emissions.

4.1 Introduction

Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Anthropogenic emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming. GHGs are global pollutants unlike toxic air contaminants, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have a relatively short atmospheric lifetime (approximately one day), GHGs have a long atmospheric lifetime (one to several thousand years). GHGs persist in the atmosphere for long enough periods to be dispersed around the globe.

Quantitatively, GHG emissions are typically expressed as carbon dioxide equivalent (CO₂e) emissions. Changes in CO₂e can be quantified for potential reduction in VMT due to the project and energy consumption by operation of the project, including powering the light rail and complementary stationary facilities.

4.2 Methodology

Operation and construction GHG emission estimates were calculated using the Transit Greenhouse Gas Emissions Estimator v3.0 (Filosa 2022). A 50-year analysis period was used to generate annual emission estimates, so that construction emissions were amortized over 50 years, which corresponds to the minimum useful lifespan of facilities (FTA 2017b).

4.3 Environmental Impacts

4.3.1 Operational Impacts Common to All Build Alternatives

Anticipated operational GHG emissions, comprised of both facility and vehicle operation and maintenance, are included in Table J-2. Project maintenance would result in 71 metric tons of carbon equivalent (MTCO₂e) and project operations would likely result in 2,567 MTCO₂e annually. Displaced regional VMT resulting from the project would be responsible for an annual emission benefit of 14,717 MTCO₂e. Overall, project operations are estimated to generate lower emissions of GHG than would occur in the area without the project, with an annual reduced emission benefit of 12,079 MTCO₂e per year.

Table J-2 Operational Greenhouse Gas Emissions for the Build Alternatives

Source	Upstream (MTCO ₂ e/year)	Downstream (MTCO ₂ e/year)	Total (MTCO ₂ e/year)
Transitway Maintenance ¹	0	71	71
Facility Operations	0	2,567	2,567
Vehicle Operations ²	0	0	0
Road Traffic ³	-1,797	-12,920	-14,717
Total Operational Emissions	-1,797	-10,282	-12,079

SOURCE: Transit Greenhouse Gas Emissions Estimator v3.0 (Filosa 2022).

NOTES:

- (1) The operational GHG emissions analysis considers OMF North base operations.
- (2) Transitways are running ways dedicated for the exclusive use of transit vehicles. As such, transitway maintenance would focus on the upkeep of these running ways.
- (3) Light rail VMT associated with the project is not included in this analysis, as the project would be powered by non-emitting sources of electricity through an agreement with Snohomish County Public Utility District.
- (4) Displaced emissions modeled as a result of VMT decreases from the 2046 No Build to Build Alternatives, divided by 9 years (the time between earliest service start in 2037 and the horizon year in 2046). For the purpose of calculating displaced emissions, Sedan/Auto (Gas) VMT includes the following vehicle classes: standard occupancy vehicle, high occupancy vehicle, transportation network company; Sedan/Auto (Diesel) VMT includes the following vehicle classes: medium truck, heavy truck; and Bus/Bus Rapid Transit (Diesel) VMT includes the following vehicle class: bus.

4.3.2 Construction Impacts Common to All Build Alternatives

Each phase of construction was considered separately and in detail, including upstream and downstream sources of emissions. In total, project construction would result in the emission of 3,589 MTCO₂e per year. This total includes amortization over a 50-year period, the minimum useful lifespan of facilities (FTA 2017b). Construction is associated with an initial negative GHG impact, but when amortized and compared with the emission benefit of project operations, the project would still have an overall benefit to GHG emissions. Annual construction and total greenhouse gas emission estimates are included in Table J-3.

Table J-3 Total Greenhouse Gas Emissions for the Build Alternatives

Source	Upstream (MTCO ₂ e/year)	Downstream (MTCO ₂ e/year)	Total (MTCO ₂ e/year)
Construction Emissions	3,262	327	3,589
Operational Emissions	-1,797	-12,920	-14,717
Total Project Emissions¹	1,465	-12,593	-11,128

SOURCE: Transit Greenhouse Gas Emissions Estimator v3.0 (Filosa 2022); see Attachment A.

NOTES:

(5) Totals may not add up due to rounding.

4.3.3 Indirect Impacts

Sound Transit has an agreement with Snohomish County Public Utility District to power the Link light rail system with non-emitting energy. Because light rail operation would use 100 percent carbon-free energy, there would be no indirect greenhouse gas emissions associated with light rail's use of electricity.

4.4 Avoidance and Minimization Measures

Sound Transit would implement construction BMPs to avoid or minimize impacts from construction-related emissions. In addition to compliance with WAC 173-400-040 (general standards for maximum emissions), BMPs, such as reducing idling of equipment when not actively in use, could be included to reduce construction impacts.

Diesel equipment could also potentially incorporate the use of renewable diesel, which has the potential to reduce both CO₂ and NO_x emissions from those associated with petroleum diesel (U.S. Department of Energy n.d.).

4.5 Potential Mitigation Measures

As discussed above, the proposed project would not result in adverse GHG emissions impacts. Use of the measures listed in Section 4.4 above would be expected to minimize construction emissions from the EVLE Project. Additional mitigation measures beyond the avoidance and minimization measures listed above are not anticipated.

5 ENVIRONMENTAL PRACTICES AND COMMITMENTS

Sound Transit views environmental stewardship as a responsibility of all employees, contractors, and consultants. The agency goes beyond regulation in its commitment to environmental stewardship and sustainability. Sound Transit's 2004 Environmental Policy states that the agency will satisfy all applicable laws and regulations and mitigate environmental impacts consistent with Sound Transit's policies, as well as strive to exceed compliance, restore the environment, avoid environmental degradation, and prevent pollution and conserve resources (Sound Transit 2004). The agency's 2007 Sustainability Initiative builds on this and identifies the agency's sustainability objectives as also addressing social and economic development issues (Sound Transit 2007).

Sound Transit implements these commitments through an International Organization for Standardization (ISO) 14001-certified Environmental and Sustainability Management System. The Sound Transit Board-approved long and short-term goals for the management system's environmental and sustainability objectives are found in Sound Transit's 2015 and 2019 Sustainability Plan update documents (Sound Transit 2019).

Sound Transit also anticipates seeking Envision certification for the project and Leadership in Energy and Environmental Design (LEED) certification for certain project facilities. Envision is a holistic sustainability framework and rating system that enables a thorough examination of the sustainability and resiliency of all types of civil infrastructure. LEED certification is a globally recognized symbol of sustainability achievement. To achieve LEED certification, a project earns points by adhering to prerequisites and credits that address carbon, energy, water, waste, transportation, materials, health, and indoor environmental quality.

6 LAND USE SUPPORTING INFORMATION

The following tables show how the EVLE Project would support and be consistent with specific goals and policies in PSRC's VISION 2050 and the local jurisdictions comprehensive plans.

Table J-4 Project Consistency with PSRC VISION 2050

Topic	Policy and Goals	Discussion
Regional Growth Strategy	Policy MPP-RGS-8: Attract 65% of the region's residential growth and 75% of the region's employment growth to the regional growth centers and high-capacity transit station areas to realize the multiple public benefits of compact growth around high-capacity transit investments. As jurisdictions plan for growth targets, focus development near high-capacity transit to achieve the regional goal.	The EVLE Project would increase connectivity between growth centers in the Core City of Lynnwood, the Metropolitan City of Everett, and unincorporated Snohomish County. The project would support mixed-use development in designated growth areas and would help focus most growth in station areas where zoning and land use codes allow greater densities.
Environment	Goal: The region cares for the natural environment by protecting and restoring natural systems, conserving habitat, improving water quality, and reducing air pollutants. The health of all residents and the economy is connected to the health of the environment. Planning at all levels considers the impacts of land use, development, and transportation on the ecosystem. Policy MPP-En-3: Maintain and, where possible, improve air and water quality, soils, and natural systems to ensure the health and well-being of people, animals, and plants. Reduce the impacts of transportation on air and water quality and climate change. Policy MPP-En-7: Reduce and mitigate noise and light pollution caused by transportation, industries, public facilities, and other sources. Policy MPP-En-21: Continue efforts to reduce pollutants from transportation activities, including the use of cleaner fuels and vehicles and increasing alternatives to driving alone, as well as design and land use.	The EVLE Project would be powered by electricity sourced from Snohomish County Public Utility District (SnoPUD), which uses hydroelectric and nuclear power for almost all of its power. Regional vehicle miles traveled and average daily traffic for the project would be lower than the No Build Alternative when some people switch from driving to using light rail, thereby reducing regional vehicle miles traveled by approximately 900,000 miles by 2046, helping to achieve Washington state's greenhouse gas emissions goals. The project is being designed to minimize effects to the natural environment and impacts will be mitigated consistent with local, state, and federal requirements. The project would include stormwater detention and treatment to address impacts related to stormwater runoff. Sound Transit's Environmental Sustainability and Management System requires that low-impact operational stormwater management techniques be investigated and considered during the project design. Low-impact development stormwater management techniques would be evaluated during the design process.

Topic	Policy and Goals	Discussion
	Policy MPP-En-22: Meet all federal and state air quality standards and reduce emissions of air toxics and greenhouse gases.	As described in the Noise and Vibration Technical Report in Draft EIS Appendix G.8, Sound Transit would provide noise mitigation where the project would exceed FTA noise criteria for operations.
Climate Change	Goal: The region substantially reduces emissions of greenhouse gases that contribute to climate change in accordance with the goals of the Puget Sound Clean Air Agency (50% below 1990 levels by 2030 and 80% below 1990 levels by 2050) and prepares for climate change impacts. Policy MPP-CC-1: Advance the adoption and implementation of actions that substantially reduce greenhouse gas emissions in support of state, regional, and local emissions reduction goals, including targets adopted by the Puget Sound Clean Air Agency. Policy MPP-CC-3: Reduce greenhouse gases by expanding the use of conservation and alternative energy sources, electrifying the transportation system, and reducing vehicle miles traveled by increasing alternatives to driving alone. Policy MP-CC-12: Prioritize transportation investments that support achievement of regional greenhouse gas emissions reduction goals, such as by reducing vehicle miles traveled.	The EVLE Project would be powered by electricity sourced from SnoPUD, which uses hydroelectric and nuclear power for almost all its power. Regional vehicle miles traveled and average daily traffic for the project would be lower than the No Build Alternative when some people switch from driving to using light rail, thereby reducing regional vehicle miles traveled by approximately 900,000 miles by 2046, helping to achieve Washington state's greenhouse gas emissions goals. The project is being designed to minimize effects to the natural environment and impacts will be mitigated consistent with local, state, and federal requirements.
Development Patterns	Goal: The region creates healthy, walkable, compact, and equitable transit oriented communities that maintain unique character and local culture, while conserving rural areas and creating and preserving open space and natural areas.	The EVLE Project would increase connectivity between growth centers as well as provide easy pedestrian access to light rail and transit stations. The project would support TOD in station areas. Following construction, remnant land could become available for redevelopment or joint development. Any TOD on surplus land owned by Sound Transit in station areas would follow the implementation strategy for Sound Transit's TOD program. The project would provide high-quality, rapid, reliable, and efficient light rail transit service to communities in the project corridor. The project would encourage convenient and safe

Topic	Policy and Goals	Discussion
Development Patterns: Building Urban Communities	Policy MPP-DP-1: Develop high-quality, compact urban communities throughout the region's urban growth area that impart a sense of place, preserve local character, provide for mixed uses and choices in housing types, and encourage walking, bicycling, and transit use. Policy MPP-DP-2: Reduce disparities in access to opportunity for the region's residents through inclusive community planning and targeted public and private investments that meet the needs of current and future residents and businesses. Policy MPP-DP-3: Enhance existing neighborhoods to provide a high degree of connectivity in the street network to accommodate walking, bicycling, and transit use and sufficient public spaces. Policy MPP-DP-12: Design transportation projects and other infrastructure to achieve community development objectives and improve communities. Policy MPP-DP-13: Allow natural boundaries to help determine the routes and placement of infrastructure connections and improvements.	non-motorized access to stations, such as bicycle and pedestrian connections. The EVLE Project would be located within Snohomish County's urban growth area (UGA). The project would increase connectivity between Metro Growth Centers and Urban Growth Centers as well as provide easy pedestrian access to light rail and transit stations. The EVLE Project would connect areas of Snohomish County with more affordable housing to employment opportunities within Snohomish County and to downtown Seattle through existing light rail corridors. Improving mobility in the EVLE corridor would help improve access to employment and educational opportunities for low-income people and people of color around the region. The EVLE Project would improve access to regional destinations along the corridor for all populations. The project would support mixed-use development in designated growth areas and would help focus most growth in station areas where zoning and land use codes allow greater densities. The project would support TOD in station areas. Following construction, remnant land could become available for redevelopment or joint development. Any TOD on surplus land owned by Sound Transit in station areas would follow the implementation strategy for Sound Transit's TOD program. The project would provide high-quality, rapid, reliable, and efficient light rail transit service to communities in the project corridor. It would expand mobility for the corridor and the region's residents, which include transit-dependent and low-income populations and people of color. Connecting to the existing light rail would provide access to additional destinations such as Seattle, Seattle-Tacoma Airport, and Tacoma. The EVLE Project would provide connections to light rail projects currently being planned or under construction to Bellevue, Redmond, West Seattle, Ballard, Tacoma, and Federal Way. The EVLE Project would efficiently move large numbers of people and encourage convenient and safe non-motorized

Topic	Policy and Goals	Discussion
		access to stations, such as bicycle and pedestrian connections. It would generally follow existing transportation corridors, thereby limiting the amount of land that would be converted to a transportation use. Responses from community outreach are incorporated into the planning and design of the project.
Development Patterns: Promoting Healthy Communities	Policy MPP-DP-15: Design communities to provide safe and welcoming environments for walking and bicycling. Policy MPP-DP-17: Promote cooperation and coordination among transportation providers, local government, and developers to ensure that joint- and mixed-use developments are designed to promote and improve physical, mental, and social health and reduce the impacts of climate change on the natural and built environments.	The EVLE Project would increase connectivity between Metro Growth Centers and Urban Growth Centers as well as provide easy pedestrian access to light rail and transit stations. The project would support mixed-use development in designated growth areas and would help focus most growth in station areas where zoning and land use codes allow greater densities. The EVLE Project would support TOD in station areas. Following construction, remnant land could become available for redevelopment or joint development. Any TOD on surplus land owned by Sound Transit in station areas would follow the implementation strategy for Sound Transit's TOD program. The project would provide high-quality, rapid, reliable, and efficient light rail transit service to communities in the project corridor. The project would encourage convenient and safe non-motorized access to stations, such as bicycle and pedestrian connections. The project would be entirely powered through electricity sourced from SnoPUD, which uses hydroelectric and nuclear power for almost all its power. The project is anticipated to reduce daily vehicle miles traveled by approximately 900,000 miles by 2046, thereby helping to achieve Washington state's greenhouse gas emissions goals. The project is being designed to minimize effects to the natural environment, and impacts would be mitigated consistent with local, state, and federal requirements.
Development Patterns: Centers: Supporting	Policy MPP-DP-22: Plan for densities that maximize benefits of transit investments in high-capacity transit station areas that are expected to attract significant new population or employment growth.	The project would support mixed-use development in designated growth areas and would help focus most growth in station areas where zoning and land use codes allow greater densities.

Topic	Policy and Goals	Discussion
Connection to Opportunity	Policy MPP-DP-23: Evaluate planning in regional growth centers and high-capacity transit station areas for their potential physical, economic, and cultural displacement of marginalized residents and businesses. Use a range of strategies to mitigate displacement impacts. Policy MPP-DP-25: Support the development of centers within all jurisdictions, including high-capacity transit station areas and countywide and local centers.	The project would support TOD in station areas. Following construction, remnant land could become available for redevelopment or joint development. Any TOD on surplus land owned by Sound Transit in station areas would follow the implementation strategy for Sound Transit's TOD program. The EVLE Project would connect Metro Growth Centers and Urban Growth Centers and implement a system that is technically and financially feasible to build, operate, and maintain. It would expand mobility for the corridor and the region's residents, which include transit-dependent and low-income populations and people of color. Connecting to the existing light rail would provide access to additional destinations such as Seattle, Seattle-Tacoma Airport, and Tacoma. The EVLE Project would provide connections to light rail projects currently being planned or under construction to Bellevue, Redmond, West Seattle, Ballard, Tacoma, and Federal Way.
Development Patterns: Collaborating to Preserve and Enhance Important Uses	Policy MPP-DP-50: Protect industrial zoning and manufacturing/industrial centers from encroachment by incompatible uses and development on adjacent land.	The EVLE Project would provide greater accessibility to the Paine Field/Boeing Everett Manufacturing and Industrial Center. Some industrial land would be converted to a transportation use. It would generally follow existing transportation corridors, thereby limiting the amount of land that would be converted to a transportation use.
Housing	Goal: The region preserves, improves, and expands its housing stock to provide a range of affordable, accessible, healthy, and safe housing choices to every resident. The region continues to promote fair and equal access to housing for all people. Policy MPP-H-7: Expand the supply and range of housing at densities to maximize the benefits of transit investments, including affordable units, in growth centers and station areas throughout the region. Policy MPP-H-8: Promote the development and preservation of long-term affordable housing options in	The project would support continued growth within the regional growth center and would support TOD in station areas where zoning allows for greater density. Following construction, remnant land could become available for redevelopment or joint development. Sound Transit's TOD and Real Property Excess, Surplus, and Disposition policies would promote racial and social equity in development that occurs in station areas and minimize displacement potential.

Topic	Policy and Goals	Discussion
	walking distance to transit by implementing zoning, regulations, and incentives.	
Economy	Policy MPP-EC-6: Ensure the efficient flow of people, goods, services, and information in and through the region with infrastructure investments, particularly in and connecting designated centers, to meet the distinctive needs of the regional economy. Policy MPP-EC-21: Concentrate a significant amount of economic growth in designated centers and connect them to each other in order to strengthen the region's economy and communities and to promote economic opportunity.	The EVLE Project is a voter-approved investment in high-capacity transit that would connect the region's metropolitan cities and designated growth areas. The Regional Growth Strategy calls for metropolitan cities to accommodate a large portion of the regional population and job growth. The EVLE Project would efficiently move large numbers of people and increase connectivity within the corridor and region. The project would provide reliable, safe, and efficient transit to residential and employment centers in Lynnwood and Everett, as well as the Paine Field/Boeing Everett Manufacturing and Industrial Center. The EVLE Project would support TOD in station areas where zoning allows for greater density. Sound Transit's TOD and Real Property Excess, Surplus, and Disposition policies would promote racial and social equity in development that occurs in station areas and minimize displacement potential. Existing reduced-fare transit pass options would continue to exist and would apply to the project, when operational.
Transportation	Goal: The region has a sustainable, equitable, affordable, safe, and efficient multimodal transportation system, with specific emphasis on an integrated regional transit network that supports the Regional Growth Strategy and promotes vitality of the economy, environment, and health.	The EVLE Project would connect Metro Growth Centers and Urban Growth Centers and implement a system that is technically and financially feasible to build, operate, and maintain. It would expand mobility for the corridor and the region's residents, which include transit-dependent and low-income populations and people of color. Connecting to the existing light rail would provide access to additional destinations such as Seattle, Seattle-Tacoma Airport, and Tacoma. The EVLE Project would provide connections to light rail projects currently being planned or under construction to Bellevue, Redmond, West Seattle, Ballard, Tacoma, and Federal Way. The EVLE Project would be powered by electricity sourced from SnoPUD, which uses hydroelectric and nuclear power for almost all of its power. Regional vehicle miles traveled and average daily traffic for the project would be lower than the No

Topic	Policy and Goals	Discussion
		Build Alternative when some people switch from driving to using light rail, thereby reducing regional vehicle miles traveled by approximately 900,000 miles by 2046, helping to achieve Washington state's greenhouse gas emissions goals. The project is being designed to minimize effects to the natural environment and impacts will be mitigated consistent with local, state, and federal requirements. The project would support TOD in station areas where zoning allows for greater density. Sound Transit's TOD and Real Property Excess, Surplus, and Disposition policies would promote racial and social equity in development that occurs in station areas and minimize displacement potential. Existing reduced-fare transit pass options would continue to exist and would apply to the project, when operational.
Transportation: The Regional Transportation Plan	Policy MPP-T-5: Develop a transportation system that minimizes negative impacts to, and promotes, human health.	The EVLE Project would encourage convenient and safe non-motorized access to stations, such as bicycle and pedestrian connections. Sound Transit would develop design criteria that provide a consistent architectural theme for all elevated elements and for features such as stations that use durable materials, while reflecting the individual characters of station areas. These criteria would be developed with input from the partner jurisdictions. Visual and aesthetic resources are discussed in the Visual and Aesthetic Resources Technical Report in Draft EIS Appendix G.6. Sound Transit would establish a Life and Safety Committee to oversee public safety and ensure it is maintained during planning, construction, and operation of the project. No new at-grade crossings of roadways are proposed as part of the EVLE Project. EVLE station design would use the principles of crime prevention through environmental design (CPTED) and include numerous features, such as abundant light, open access, and visibility, to address security issues. CPTED design measures would also control passenger movements with specific traffic flow patterns and include closed-circuit television cameras

Topic	Policy and Goals	Discussion
		(CCTVs), emergency telephones, controlled exits, and sealed fare boxes.
Transportation: The Regional Transportation Plan	Policy MPP-T-7: Fund, complete, and operate the highly efficient, multimodal system in the <i>Regional Transportation Plan</i> (PSRC 2022a) to support the Regional Growth Strategy. Coordinate with the Washington State Department of Transportation (WSDOT), regional, and local transportation agencies, in collaboration with the state legislature, to build the multimodal system. Policy MPP-T-8: Strategically expand capacity and increase efficiency of the transportation system to move goods, services, and people consistent with the Regional Growth Strategy. Focus on investments that produce the greatest net benefits to people and minimize the environmental impacts of transportation.	The project is a voter-approved investment in high-capacity transit that would connect regional centers and implement a system that is technically and financially feasible to build, operate, and maintain. The project would provide reliable, safe, and efficient transit to residential and employment centers in Lynnwood and Everett, as well as the Paine Field/Boeing Everett Manufacturing and Industrial Center. The <i>Regional Transportation Plan</i> (PSRC 2022) identifies the EVLE Project as part of the region's future integrated transit network and highlights its role in supporting equitable access to opportunity, reliable regional connections, and catalyzing economic and TOD within the region.
Transportation: The Regional Transportation Plan	Policy MPP-T-9: Implement transportation programs and projects that provide access to opportunities while preventing or mitigating negative impacts to people of color, people with low incomes, and people with special transportation needs. Policy MPP-T-10: Ensure mobility choices for people with special transportation needs, including persons with disabilities, seniors, youth, and people with low incomes. Policy MPP-T-11: Design, construct, and operate a safe and convenient transportation system for all users while accommodating the movement of freight and goods, using best practices and context-sensitive design strategies.	The EVLE Project would provide key transit connections to local and regional destinations in Lynnwood, Everett, and unincorporated Snohomish County. These communities have ethnically and economically diverse populations. It would expand mobility for the corridor and the region's residents, which include transit-dependent and low-income populations and people of color. Connecting to the existing light rail would provide access to additional destinations such as Seattle, Seattle-Tacoma Airport, and Tacoma. Sound Transit would establish a Fire/Life and Safety Committee to oversee public safety and ensure it is maintained during planning, construction, and operation of the project. The project would provide an alternative to automobile commuters in Lynnwood, Everett, and Snohomish County, including the key industrial area Paine Field/Boeing Manufacturing and Industrial Center. As a result, automotive congestion would decrease along freight routes, leading to increased mobility and greater network connectivity for freight along the corridor. The project would include traffic mitigation

Topic	Policy and Goals	Discussion
		measures that could improve freight corridors and increase mobility.
Transportation: The Regional Transportation Plan	Policy MPP-T-12: Emphasize transportation investments that provide and encourage alternatives to single-occupancy vehicle travel and increase travel options, especially to and within centers and along corridors connecting centers. Policy MPP-T-13: Increase the proportion of trips made by transportation modes that are alternatives to driving alone, especially to and within centers and along corridors connecting centers, by ensuring availability of reliable and competitive transit options. Policy MPP-T-14: Integrate transportation systems to make it easier for people to move from one mode or technology or another.	The project would provide an alternative to automobile commuters in Lynnwood, Everett, and Snohomish County, including the key industrial area Seattle Paine Field/Everett Boeing Manufacturing and Industrial Center. As a result, automotive congestion would decrease along freight routes, leading to increased mobility and greater network connectivity for freight along the corridor. The project would include traffic mitigation measures that could improve freight corridors and increase mobility. The project would provide connections to Community Transit and Everett Transit bus systems including BRT. Light rail stations would provide connections to Community Transit's Swift BRT network at West Alderwood, Ash Way, SR 526/Evergreen, and Everett Station.
Transportation: The Regional Transportation Plan	Policy MPP-T-15: Prioritize investments in transportation facilities and services in the UGA that support compact, pedestrian- and transit-oriented densities and development. Policy MPP-T-19: Design transportation programs and projects to support local and regional growth centers and high-capacity transit station areas. Policy MPP-T-20: Promote the preservation of existing rights-of-way for future high-capacity transit. Policy MPP-T-21: Design transportation facilities to fit within the context of the built or natural environments in which they are located.	The project would efficiently move large numbers of people and encourage convenient and safe non-motorized access to stations, such as bicycle and pedestrian connections. It would generally follow existing transportation corridors, thereby limiting the amount of land that would be converted to a transportation use. The project would support TOD and mixed-use development in station areas where zoning allows for greater density. Sound Transit's TOD and Real Property Excess, Surplus, and Disposition policies would promote racial and social equity in development that occurs in station areas and minimize displacement potential. Existing reduced-fare transit pass options would continue to exist and would apply to the project, when operational.
Transportation: Supporting the Economy	Policy MPP-T-23: Make transportation investments that improve economic and living conditions so industries and skilled workers continue to be retained and attracted to the region.	The EVLE Project would create a high-capacity transit connection between employment centers in Lynnwood, Everett, and unincorporated Snohomish County. New light rail stations would be added in employment and residential centers in Snohomish County, connecting workers to job centers in

Topic	Policy and Goals	Discussion
		downtown Everett, Alderwood Mall and the Paine Field/Boeing Everett Manufacturing and Industrial Center. Connecting to the existing light rail would provide access to additional destinations such as Seattle, Seattle-Tacoma Airport, and Tacoma. The EVLE Project would provide connections to light rail projects currently being planned or under construction to Bellevue, Redmond, West Seattle, Ballard, Tacoma, and Federal Way.
Transportation: Protecting the Environment	Policy MPP-T-29: Support the transition to a cleaner transportation system through investments in zero emission vehicles, low-carbon fuels, and other clean energy options. Policy MPP-T-31: Advance the resilience of the transportation system by incorporating redundancies, preparing for disasters and other impacts, and coordinated planning for system recovery. Policy MPP-T-32: Reduce stormwater pollution from transportation facilities and improve fish passage, through retrofits and updated design standards. Where feasible, integrate with other improvements to achieve multiple benefits and cost efficiencies.	The EVLE Project would be powered by electricity sourced from SnoPUD, which uses hydroelectric and nuclear power for almost all its power. Regional vehicle miles traveled and average daily traffic for the project would be lower than the No Build Alternative when some people switch from driving to using light rail, thereby reducing regional vehicle miles traveled by approximately 900,000 miles by 2046, helping to achieve Washington state's greenhouse gas emissions goals. The project is being designed to minimize effects to the natural environment and impacts will be mitigated consistent with local, state, and federal requirements. The project would include stormwater detention and treatment to address impacts related to stormwater runoff. Sound Transit's Environmental Sustainability and Management System requires that low-impact operational stormwater management techniques be investigated and considered during the project design.
Public Services	Goal: The region supports development with adequate public facilities and services in a timely, coordinated, efficient, and cost-effective manner that supports local and regional growth planning objectives.	The project is a voter-approved investment in high-capacity transit that would connect regional centers and implement a system that is technically and financially feasible to build, operate, and maintain. It would expand mobility for the corridor and the region's residents, which include transit-dependent and low-income populations and people of color. The EVLE Project would increase connectivity between Metro Growth Centers and Urban Growth Centers as well as provide easy access to light rail and transit stations.

Topic	Policy and Goals	Discussion
		Connecting to the existing light rail would provide access to additional destinations such as Seattle, Seattle-Tacoma Airport, and Tacoma. The EVLE Project would provide connections to light rail projects currently being planned or under construction to Bellevue, Redmond, West Seattle, Ballard, Tacoma, and Federal Way.
Public Services	Policy MPP-PS-1: Protect and enhance the environment and public health and safety when providing services and facilities.	Sound Transit's Fire/Life and Safety Committee would review safety requirements and develop solutions regarding access to the light rail system, emergency routes, water and fire hydrant needs, training, costs, and other design features; specific emergency procedures and necessary equipment would be determined during final design (see the Public Services, Safety, and Security Technical Report in Draft EIS Appendix G.15). The EVLE Project would be entirely powered through electricity sourced from SnoPUD, which uses hydroelectric and nuclear power for almost all its power. Regional vehicle miles traveled and average daily traffic for the project would be lower than the No Build Alternative when some people switch from driving to using light rail, thereby reducing regional vehicle emissions of criteria pollutants, mobile source air toxics, and greenhouse gases. The project is being designed to minimize effects to the natural environment, and impacts would be mitigated consistent with local, state, and federal requirements. Design of stations would include context-sensitive design. Sound Transit would implement CPTED design principles aiming to reduce criminal activities at stations. Other measures to minimize crime could include use of security equipment, anti-crime programs, and security personnel. Sound Transit would also develop design criteria that provide a consistent architectural theme for all elevated elements and for features such as stations that use durable materials, while reflecting the individual characters of station areas. These criteria would be developed with input from the partner jurisdictions. Visual and aesthetic resources are discussed in the Visual and Aesthetic Resources Technical Report in Draft EIS Appendix G.6.

Topic	Policy and Goals	Discussion
Public Services	Policy MPP-PS-2: Promote affordability and equitable access of public services to all communities, especially the historically underserved. Prioritize investments to address disparities. Policy MPP-PS-29: Site or expand regional capital facilities in a manner that (1) reduces adverse social, environmental, and economic impacts on the host community, especially on historically marginalized communities, (2) equitably balances the location of new facilities away from disproportionately burdened communities, and (3) addresses regional planning objectives.	The project would support continued growth within the designated growth centers and would support TOD in station areas where zoning allows for greater density. Sound Transit's TOD and Real Property Excess, Surplus, and Disposition policies would promote racial and social equity in development that occurs in station areas and minimize displacement potential. Existing reduced-fare transit pass options would continue to exist and would apply to the project, once operational. The EVLE Project would provide key transit connections to local and regional destinations in Lynnwood, Everett, and unincorporated Snohomish County. These communities have ethnically and economically diverse populations. It would expand mobility for the corridor and the region's residents, which include transit-dependent and low-income populations and people of color. Connecting to the existing light rail would provide access to additional destinations such as Seattle, Seattle-Tacoma Airport, and Tacoma.

SOURCE: PSRC (2020).

Table J-5 Project Consistency with Imagine Lynnwood Comprehensive Plan

Topic	Policy and Goals	Discussion
Land Use	LU Goal 2: Promote growth and development in the City's designated Regional Growth Center. LU Policy 2.1: Strive to accommodate 75 percent of residential growth and 65 percent of employment growth within the City Center + Alderwood Subarea. LU Policy 2.4: Promote development in the City Center + Alderwood Subarea that increases access to opportunities and improves quality of life by providing building design integrated with multimodal transportation facilities and publicly accessible open spaces. LU Goal 3: Encourage compact commercial and mixed-use neighborhoods surrounding high-capacity transit corridors to serve residents and people traveling to and from Lynnwood.	The EVLE Project would support mixed-use development in designated growth areas and would focus most growth in station areas where zoning and land use codes allow greater densities, including near Alderwood Mall in the City Center + Alderwood Subarea. The increased density would promote more efficient use of land, allowing for efficient provision of services and facilities, as well as promoting walkable neighborhoods. Following construction, remnant land could become available for redevelopment or joint development. Any TOD on surplus land owned by Sound Transit in station areas

Topic	Policy and Goals	Discussion
	LU Policy 3.1: Promote dense residential and employment uses near high capacity transit stations to provide residents with greater access to transportation, housing, and economic opportunities. LU Policy 3.6: Continue coordination with transportation providers to further develop joint- and mixed-use developments that promote physical, mental, and social health of the community, while reducing impact to the surrounding environment.	would follow the implementation strategy for Sound Transit's TOD program.
	LU Policy 3.2: Design high-capacity transit areas to include non-motorized connections accessible to the public, providing connectivity for bicyclists and pedestrians to transit stations and other key areas.	The EVLE Project would encourage convenient and safe non-motorized access to stations, such as bicycle and pedestrian connections.
Environment	EN Goal 4: Significantly reduce greenhouse gas emissions to support local and regional reduction targets. EN Policy 4.2: Promote sustainable energy sources, electrifying the transportation system, and limiting vehicle miles traveled to support state, regional, and local climate change goals. EN Policy 4.4: Advocate for expansion of mass transit and encourage car-sharing, cycling, and walking as an alternative to dependence on automobiles. EN Policy 4.11: Continually update the City's commute trip reduction policy to reduce automobile-related air pollution, traffic congestion, and energy use through employer-based programs that encourage the use of alternatives to the single occupant vehicle.	The EVLE Project would be powered by electricity sourced from SnoPUD, which uses hydroelectric and nuclear power for almost all its power. Regional vehicle miles traveled and average daily traffic for the project would be lower than the No Build Alternative when some people switch from driving to using light rail, thereby reducing regional vehicle miles traveled by approximately 900,000 miles by 2046, helping to achieve Washington State's greenhouse gas emissions goals.
Housing	HO Goal 4: Incentivize affordable, sustainable, and workforce housing near transportation and employment centers. HO Policy 4.1: Implement zoning, regulation, and incentive changes near transit oriented development (TOD) sites to guide sustainable and equitable development patterns that incorporate affordable housing and public amenities. HO Policy 4.2: Promote mixed-use development near transportation facilities, commercial and employment centers, public services, schools, and recreational areas.	The EVLE Project would add high-capacity transit stations in areas Lynnwood has zoned for high-density mixed-use development. Following construction, remnant land could become available for redevelopment or joint development. Any TOD on surplus land owned by Sound Transit in station areas would follow the implementation strategy for Sound Transit's TOD program. Sound Transit's TOD and Real Property Excess, Surplus, and Disposition policies promote

Topic	Policy and Goals	Discussion
	HO Policy 4.3: Preserve existing multi-family housing near transportation and employment centers as growth occurs.	racial and social equity for development that occurs in station areas and minimize displacement potential.
Economic Development	ED Policy 2.3: Concentrate a significant amount of economic growth in Lynnwood's designated City Center + Alderwood subarea and near high-capacity transit to strengthen the City's economy and promote economic opportunity.	The EVLE Project would connect the Lynnwood Urban Growth Center with an additional light rail station. The project would support TOD in station areas, encouraging the concentration of employment and retail centers near light rail stations.
Transportation	TR Goal 1: Provide a transportation system that efficiently moves people and goods to local and regional destinations. TR Policy 1.1: Plan and construct transportation improvements consistent with local and regional growth. TR Policy 1.2: Develop a strategy to coordinate effectively with other local, regional, state, and federal agencies on needed transportation improvements. TR Policy 1.5: Coordinate with Community Transit and Sound Transit for the planning, design, construction, and maintenance of transit services to make transit an attractive travel option for residents and visitors.	The EVLE Project would connect the Lynnwood Urban Growth Center with an additional light rail station. The project would also provide an efficient connection to residential and employment centers in Everett and Snohomish County. Sound Transit would coordinate with local transit agencies to integrate light rail service with local bus service.

SOURCE: City of Lynnwood (2025)

Table J-6 Project Consistency with Everett Comprehensive Plan

Topic	Policy and Goals	Discussion
Transportation	Goal TR-1: Everett has a safe, resilient, sustainable, equitable, and accessible multimodal transportation system that serves all members of the community. Policy TR-14: Everett proactively partners with other jurisdictions, transit agencies, and regional planning agencies in the development of an efficient and effective regional multimodal transportation system Policy TR-16: Integrate high-capacity transit systems with transportation modes and facilities serving the city including	The EVLE Project would connect Metro Growth Centers and Urban Growth Centers and implement a system that is technically and financially feasible to build, operate, and maintain. It would expand mobility for the corridor and the region's residents, which include transit-dependent and low-income populations and people of color. Connecting to the existing light rail would provide access to additional destinations such as Seattle, Seattle-Tacoma Airport, and Tacoma. The project would also provide connections to light rail projects currently being planned or under

Topic	Policy and Goals	Discussion
	inter-city and local transit, rideshare, and park & rides, as well as pedestrian and bicycle facilities.	construction to Bellevue, Redmond, West Seattle, Ballard, Tacoma, and Federal Way. The project would provide connections to Community Transit and Everett Transit bus systems including BRT. Light rail stations would provide connections to Community Transit's Swift BRT network at West Alderwood, Ash Way, SR 526/Evergreen, and Everett Station.
Transportation	Goal TR-3: Everett's multimodal transportation network is developed based on adopted land use vision and zoning to accommodate and support the City's targeted population and employment growth. Policy TR-5: Design city transportation network and require private development to accommodate all modes consistent with all adopted City transportation and land use plans. Policy TR-7: Integrate land use and transportation planning and decisions to support the Comprehensive Plan.	The EVLE Project would connect the region's metropolitan cities and designated growth areas with high-capacity transit. The EVLE Project would efficiently move large numbers of people and increase connectivity within the corridor and region. The project would provide reliable, safe, and efficient transit to residential and employment centers in Lynnwood and Everett, as well as the Paine Field/Boeing Everett Manufacturing and Industrial Center. The project would support TOD in station areas. Following construction, remnant land could become available for redevelopment or joint development. Any TOD on surplus land owned by Sound Transit in station areas would follow the implementation strategy for Sound Transit's TOD program.
Transportation	Goal TR-6: Everett's public transportation system seamlessly provides convenient, safe, comfortable, and equitable services for residents, visitors, and workers, with daily boardings tripling by 2044. Policy TR-48: Support expansion of heavy and light rail transportation and facilities for freight and passenger services.	The EVLE Project would connect Metro Growth Centers and Urban Growth Centers and would include three new light rail stations in Everett. Connecting to the existing light rail would provide access to additional destinations such as Seattle, Seattle-Tacoma Airport, and Tacoma. The project would also provide connections to light rail projects currently being planned or under construction to Bellevue, Redmond, West Seattle, Ballard, Tacoma, and Federal Way. By increasing transit options within the city and connecting Everett to the regional light rail network, the project would improve mobility for residents, workers, and visitors, helping the city meet its target of tripling daily boardings by 2044.

Topic	Policy and Goals	Discussion
Transportation	Goal TR-11: Everett's transportation system supports achieving regional greenhouse gas emissions reduction goals and reducing per capita vehicle miles traveled. Policy TR-41: Decrease vehicle miles traveled by promoting and incentivizing alternate modes of travel, including transit and active transportation. Goal TR-12: Everett's proportion of commute trips by single occupant vehicles decreases. Policy TR-15: Maintain transit service as a viable mode-of-travel to and from downtown and other activity centers within the city and region and grow transit into a well-integrated network of fast, frequent, and reliable service for most people. Prioritize transit and other transportation services to trip generating sites in Everett.	The EVLE Project would connect regional centers and implement a system that is technically and financially feasible to build, operate, and maintain. It would expand mobility for the project corridor and the region's residents. Connecting to the existing light rail would provide access to additional destinations such as Seattle, Seattle-Tacoma Airport, and Tacoma. The EVLE Project would provide connections to light rail projects currently being planned or under construction to Bellevue, Redmond, West Seattle, Ballard, Tacoma, and Federal Way. By providing high-capacity transit connections, the EVLE Project would reduce regional vehicle miles traveled and average daily traffic for the project would be lower than the No Build Alternative when some people switch from driving to using light rail, thereby reducing regional vehicle emissions of criteria pollutants, mobile source air toxics, and greenhouse gases.
Land Use	Goal UF-2: Everett is an integrated city of residential, mixed use, commercial, industrial, public facilities, open space, and natural habitats. Policy UF-2: Direct most of Everett's growth and change to designated centers (Metro Everett Regional Growth Center, SW Everett Manufacturing/Industrial Center, Community Hubs, Neighborhood Nodes), transportation corridors, and transit station areas, allowing the continuation of the scale and characteristics of the city's residential neighborhoods. Policy UF-13: Plan for and support development of mixed-use centers across the city, including the Metro Everett Regional Growth Center, Community Hubs, and Neighborhood Nodes. Policy UF-38: Make Everett's corridors and connectors thriving places for people that support and link Everett's centers.	The EVLE Project would increase connectivity between downtown Everett and near SR 526/Evergreen, which is planned for high-density mixed-use development. The project would support mixed-use development in designated growth areas and would help focus most growth in station areas where zoning and land use codes allow greater densities. The EVLE Project would support TOD in station areas where zoning allows for greater density. Sound Transit's TOD and Real Property Excess, Surplus, and Disposition policies would promote racial and social equity in development that occurs in station areas and minimize displacement potential.
Land Use	Policy UF-19: Improve centers as multi-modal transportation hubs that optimize access from the broad area of the city they	The EVLE Project would support mixed-use development in designated growth areas and would focus most growth in station areas where zoning and land use codes allow greater densities. The increased density would promote

Topic	Policy and Goals	Discussion
	serve and are linked to the region's high-capacity transit system. Policy UF-21: Connect centers to each other and to other key local regional destinations, such as schools, parks, and employment areas by pedestrian trails and sidewalks, bicycle routes, and frequent and convenient transit.	more efficient use of land, allowing for efficient provision of services and facilities, as well as promoting walkable neighborhoods. The EVLE Project would serve as an alternative to the single-occupancy vehicle and would also provide linkages to other travel modes such as rail, bus, and non-motorized.
Land Use	Policy UF-25: Enhance Metro Everett as the region's multi-modal transportation hub and optimize regional access moving people and goods among key destinations.	The EVLE Project would connect regional centers and expand mobility for the project corridor and the region's residents. Connecting to the existing light rail would provide access to additional destinations such as Seattle, Seattle-Tacoma Airport, and Tacoma. The EVLE Project would provide connections to light rail projects currently being planned or under construction to Bellevue, Redmond, West Seattle, Ballard, Tacoma, and Federal Way.
Economic Development	Goal ED 5: Everett's infrastructure meets the needs for current and future businesses, by investing in transportation system and utilities. Policy ED-39: Maintain and improve the transportation network as necessary to facilitate the efficient movement of goods and attract economic activity. Policy ED-41: Anticipate infrastructure systems and facilities needs and prioritize public investments necessary to support catalytic economic development and redevelopment projects.	The EVLE Project would provide high-quality rapid, reliable, and efficient LRT service to communities in the project corridor, connecting designated employment and residential growth centers.
Economic Development	Goal ED 6: Everett's employment growth is focused in robust and thriving mixed-use and industrial centers that are easily accessible to transportation networks and provide high-quality services to attract and retain businesses.	The EVLE Project would support mixed-use development in designated growth areas and focus most growth in station areas where zoning and land use codes allow greater densities. The increased density would promote more efficient use of land, allowing for efficient provision of services and facilities, as well as promoting walkable neighborhoods.

SOURCE: City of Everett (2025).

Table J-7 Project Consistency with Snohomish County Comprehensive Plan

Topic	Policy and Goals	Discussion
Economic Development	ED Policy 3.D.1: Snohomish County shall maximize the growth potential of local port and airport resources through continued commitment of resources, improved transportation access to the physical sites, and effective marketing.	The EVLE Project, via local shuttle service, would provide high-capacity transit access to the Paine Field passenger terminal, providing airport passengers with an additional transit option.
Natural Environment	NE Policy 1.B.4: The county shall plan for growth in a manner that encourages reduction of sprawl, meets GMA housing goals and places employment and residential uses in close proximity to reduce impacts to air quality. Objective NE 8.C: Promote and enhance regional air quality by reducing air pollution emissions associated with land uses and transportation in accordance with national, state, regional, and local policies and standards.	The EVLE Project would serve as a catalyst for TOD in the areas surrounding stations, where zoning allows greater densities. Following construction, remnant land could become available for redevelopment or joint development. Any TOD on surplus land owned by Sound Transit in station areas would follow the implementation strategy for Sound Transit's TOD program. Sound Transit's TOD and Real Property Excess, Surplus, and Disposition policies promote racial and social equity for development that occurs in station areas and minimize displacement potential. By providing high-capacity transit connections, the EVLE Project would reduce regional vehicle miles traveled and average daily traffic for the project would be lower than the No Build Alternative when some people switch from driving to using light rail, thereby reducing regional vehicle emissions of criteria pollutants, mobile source air toxics, and greenhouse gases.
Transportation	Objective TR 6.E: The County shall support energy efficient modes of transportation, fuels, and technologies that reduce negative impacts on the environment and reduce greenhouse gas emissions.	The EVLE Project would be powered by electricity sourced from SnoPUD, which uses hydroelectric and nuclear power for almost all its power. Regional vehicle miles traveled and average daily traffic for the project would be lower than the No Build Alternative when some people switch from driving to using light rail, thereby reducing regional vehicle miles traveled by approximately 900,000 miles by 2046, helping to achieve Washington State's greenhouse gas emissions goals.
Transportation	TR Policy 6.D.4: The County shall encourage regional and local transit agencies, and WSDOT to plan bus, rail and	The project would provide connections to Community Transit and Everett Transit bus systems including BRT. Light rail stations would provide connections to Community Transit's

Topic	Policy and Goals	Discussion
	ferry transit services that are time coordinated and interconnected. TR Policy 6.D.3: Transportation centers and terminals within unincorporated Snohomish County shall be located and designed to permit use by multiple modes of travel (e.g., bus, aviation, intercity rail, ferry, auto, bicycle, pedestrian/people with limited mobility, and high-capacity transit). TR Policy 6.D.2: Transportation facilities and services within unincorporated Snohomish County shall be cooperatively planned and developed to efficiently interface with high-capacity transit, ferry, and passenger air transportation terminals and facilities.	Swift BRT network at West Alderwood, Ash Way, SR 526/Evergreen, and Everett Station. Station location and access would be designed to optimize access to local transit routes where possible in coordination with local transit providers.
Transportation	TR Policy 2.A.8: The County shall work cooperatively with transit agencies and the local community to address impacts on communities when designing and locating transit centers.	Design of stations would include context-sensitive design. Sound Transit would also develop design criteria that provide a consistent architectural theme for all elevated elements and for features such as stations that use durable materials, while reflecting the individual characters of station areas. These criteria would be developed with input from the partner jurisdictions. Visual and aesthetic resources are discussed in the Visual and Aesthetic Resources Technical Report in Draft EIS Appendix G.6.
Transportation	TR Policy 3.B.1: The County's transportation plans and programs shall be in conformity with the State and Federal Clean Air Act, and consistent with goals to reduce nitrous oxide, carbon monoxide, ozone levels, and meet other national air quality standards. TR Policy 3.C.6: The County shall support energy efficient modes of transportation, fuels, and technologies that reduce negative impacts on the environment and reduce greenhouse gas emissions. TR Policy 3.A.1: Develop the transportation system within unincorporated Snohomish County in a way that reduces pollution and the negative impacts to the climate and the natural environment.	The EVLE Project would connect regional centers and implement a system that is technically and financially feasible to build, operate, and maintain. It would expand mobility for the project corridor and the region's residents. Connecting to the existing light rail would provide access to additional destinations such as Seattle, Seattle-Tacoma Airport, and Tacoma. The EVLE Project would provide connections to light rail projects currently being planned or under construction to Bellevue, Redmond, West Seattle, Ballard, Tacoma, and Federal Way. By providing high-capacity transit connections, the EVLE Project would reduce regional vehicle miles traveled and average daily traffic for the project would be lower than the No Build Alternative when some people switch from driving to

Topic	Policy and Goals	Discussion
	TR Policy 5.A.10: The County shall prioritize active transportation improvement investments for locations that have the greatest potential for improving access to schools, parks/trails, public transit, public facilities, multi-family residences, commercial areas, and historically and currently marginalized communities. TR Policy 3.C.3: Convenient alternatives to single-occupant vehicle use shall be encouraged within unincorporated Snohomish County to reduce energy consumption, air and water pollution, greenhouse gas emissions, and noise levels. TR Policy 2.A.3: The County shall develop a transportation system that encourages a reduction of the negative impacts to human health.	using light rail, thereby reducing regional vehicle emissions of criteria pollutants, mobile source air toxics, and greenhouse gases. Sound Transit station access allowance funding would be used to invest in improvements to bike and pedestrian access to the stations.
Transportation	TR Policy 3.A.3: The transportation facilities within unincorporated Snohomish County, including circulation roadways and driveways, shall be located and designed to minimize the disruption of shorelines, critical areas, resource lands, and other environmentally sensitive areas.	The EVLE Project would follow all applicable local, state, and federal laws to minimize disruption to the natural environment where possible. The project would be designed to avoid and minimize impacts on environmentally sensitive resources and provide suitable mitigation when impacts are unavoidable, ensuring no net loss of ecosystem function or acreage.
Transportation	TR Policy 2.A.4: The County shall design and construct transportation facilities that will accommodate elderly persons and persons with disabilities. TR Policy 2.A.7: In cooperation with transit operating agencies, cities, WSDOT, and social service agencies, support mobility options for people with special transportation needs, including persons with disabilities, the elderly, children, and low-income populations.	The EVLE Project would follow local and national guidelines for incorporating equity into decision-making and design. Facilities would be located to minimize adverse impacts where possible and provide the greatest benefit for historically excluded populations. Light rail station designs would incorporate universal design philosophy to accommodate the mobility needs of passengers, including those with disabilities, the elderly, and the young. Stations would be integrated into the existing transportation network including sidewalks, bike facilities, and crosswalks.
Transportation	TR Policy 3.C.4: The County shall consider pricing or regulatory mechanisms (e.g., metered parking and tolling) to	By providing high-capacity transit connections, the EVLE Project would reduce regional vehicle miles traveled, and the average daily traffic for the project would be lower than the No Build Alternative when some people switch from driving to

Topic	Policy and Goals	Discussion
	encourage public transit use, reduce single-occupant vehicle trips, reduce greenhouse gas emissions.	using light rail, thereby reducing regional vehicle emissions of criteria pollutants, mobile source air toxics, and greenhouse gases.
Transportation	TR Policy 6.A.5: Public transit stops and public transit access within unincorporated Snohomish County shall be provided for applicable land uses where they attract large numbers of employees and/or customers.	The EVLE Project would create a high-capacity transit connection between employment centers in Lynnwood, Everett, and unincorporated Snohomish County. New light rail stations would be added in employment and residential centers in Snohomish County, connecting workers to job centers in downtown Everett, Alderwood Mall, and the Paine Field/Boeing Everett Manufacturing and Industrial Center.
Transportation	TR Policy 6.C.1: Transit-oriented development shall be located to support the development within unincorporated Snohomish County of centers designated on the Future Land Use Map, existing or planned transit emphasis corridors, pedestrian-scale neighborhoods, and activity centers to increase public transit ridership, ridesharing, and other alternatives to driving-alone trips. TR Policy 6.C.2: Transit-oriented development within unincorporated Snohomish County shall include safe, pleasant and convenient access that provide for pedestrians and bicyclists, as well as efficient transfer between all modes of travel.	The EVLE Project would serve as a catalyst for TOD in the areas surrounding stations, where zoning allows greater densities. Following construction, remnant land could become available for redevelopment or joint development. Any TOD on surplus land owned by Sound Transit in station areas would follow the implementation strategy for Sound Transit's TOD program. Sound Transit's TOD and Real Property Excess, Surplus, and Disposition policies promote racial and social equity for development that occurs in station areas and minimize displacement potential. Light rail stations would be integrated with existing non-motorized facilities such as bike lanes, trails, and bridges.
Transportation	Goal TR 1: Plan, develop, and maintain an economical, equitable, inclusive, resilient, and safe multimodal transportation system through intergovernmental coordination that complements the County's Comprehensive Plan and promotes economic vitality, environmental sustainability, and human health. TR Policy 1.A.3: Collaborate and coordinate with transit agencies to ensure consistency between the County's transportation planning and regional and local transit agencies.	The <i>Regional Transportation Plan</i> identifies EVLE as part of the region's future integrated transit network and highlights its role in supporting equitable access to opportunity, reliable regional connections, and catalyzing economic and TOD within the region.
Transportation	TR Policy 6.A.2: The County shall encourage the extension of public transit throughout the urban area at a level of	The EVLE Project is a voter-approved investment in high-capacity transit that would connect regional centers and

Topic	Policy and Goals	Discussion
	service appropriate to the planned form and intensity of development.	implement a system that is technically and financially feasible to build, operate, and maintain. The project would provide reliable, safe, and efficient transit throughout the urbanized area of unincorporated Snohomish County.
Transportation	TR Policy 8.B.6: Transportation facilities or Level of Service which generate pressures for land use change shall not be programmed or adopted where they are inconsistent with the County's Comprehensive Plan.	EVLE Project stations would be located in areas planned for high-density residential and employment growth. The stations in unincorporated Snohomish County would be located within areas that are identified as urban centers by the comprehensive plan and are zoned for high-density mixed-use development.
Transportation	TR Policy 6.A.3: A transit-supportive transportation system shall be provided within unincorporated Snohomish County that links centers designated on the Future Land Use Map. TR Policy 6.A.4: The County shall encourage regional and countywide centers to be connected with high-capacity transit and HOV lanes on State Routes.	The EVLE Project would connect Metro Growth Centers and Urban Growth Centers in Snohomish County. Connecting to the existing light rail would provide access to additional destinations such as Seattle, Seattle-Tacoma Airport, and Tacoma. The EVLE Project would provide connections to light rail projects currently being planned or under construction to Bellevue, Redmond, West Seattle, Ballard, Tacoma, and Federal Way.
Transportation	TR Policy 1.A.4: Transportation planning within Snohomish County's unincorporated UGAs will include consideration and evaluation of additional public transit services to major employment centers.	The EVLE Project would create a high-capacity transit connection between employment centers in Lynnwood, Everett, and unincorporated Snohomish County. New light rail stations would be added in employment and residential centers in Snohomish County, connecting workers to job centers in downtown Everett, Alderwood Mall, and the Paine Field/Boeing Everett Manufacturing and Industrial Center.
Land Use	LU Policy 3.D.5: Manufacturing / Industrial Centers shall be supported by adequate public facilities and service, including good access to the regional transportation system.	The EVLE Project would provide greater accessibility to the Paine Field/Boeing Everett Manufacturing and Industrial Center. The EVLE Project would create key transfer points regionally, increasing connectivity to communities to the south of the project corridor. Connecting to the existing light rail would provide access to additional destinations such as Seattle, Seattle-Tacoma Airport, and Tacoma.
Land Use	LU Policy 3.F.1: The county shall coordinate with transit service and other service providers in setting high priorities	The EVLE Project would connect Metro Growth Centers and Urban Growth Centers in Snohomish County. The EVLE Project would support TOD and mixed-use development in

Topic	Policy and Goals	Discussion
	for development and installation of capital improvements within centers. LU Policy 3.F.2: The county shall coordinate the design and development of centers and their connecting transit emphasis corridors in unincorporated areas with developers, transit planning agencies, and service providers, and other key parties to achieve compatibility of land use, transportation, and capital facility objectives within centers.	station areas where zoning allows for greater density. Sound Transit's TOD and Real Property Excess, Surplus, and Disposition policies would promote racial and social equity in development that occurs in station areas and minimize displacement potential. Existing reduced-fare transit pass options would continue to exist and would apply to the project, when operational.
Land Use	LU Policy 3.C.2: Urban Villages shall be located where access to transportation facilities is available or can be improved based on the demands of the specific site and intensity of development and shall be designed to maximize use of nearby transit facilities.	The EVLE Project would connect the designated Urban Village near Ash Way Park & Ride with high-capacity transit service.
Land Use	Objective LU 2.A: Increase residential densities within UGAs by concentrating and intensifying development in appropriate locations, particularly within designated centers and along identified transit emphasis corridors. LU Policy 2.B.1: In association with affected local, regional, tribal, and state agencies, the county shall pursue integrated land use and transportation planning along transit emphasis corridors. Corridor planning and corridor plans will include the following features consistent with the direction in the transportation element and may also address other topics relevant to each particular corridor. LU Policy 2.B.7: Projects within or near designated centers or along transit emphasis corridors shall provide pedestrian and bicycle connections to transit facilities and/or the center to encourage pedestrian activity, support transit use and decrease auto trips. LU Policy 2.B.6: The county shall work to link new and existing neighborhoods within and near identified transit emphasis corridors creating a sense of community and shall include sidewalks and paths, where practicable, for safe passage to schools and other places of activity in the community.	The EVLE Project would efficiently move large numbers of people and encourage convenient and safe non-motorized access to stations, such as bicycle and pedestrian connections. It would generally follow existing transportation corridors, thereby limiting the amount of land that would be converted to a transportation use. The project would also provide connections to light rail projects currently being planned or under construction to Bellevue, Redmond, West Seattle, Ballard, Tacoma, and Federal Way. Sound Transit is coordinating with Everett Transit and Community Transit, and several other governmental agencies to ensure the project is integrated with existing and future transit opportunities. The EVLE Project would support TOD and mixed-use development in station areas where zoning allows for greater density. Sound Transit's TOD and Real Property Excess, Surplus, and Disposition policies would promote racial and social equity in development that occurs in station areas and minimize displacement potential. Existing reduced-fare transit pass options would continue to exist and would apply to the project, when operational.

Topic	Policy and Goals	Discussion
	Policy LU 3.B.2: Urban Centers, Light Rail Communities, and Mixed Use Corridors shall be located within a UGA and Subsection (a) Contain a mix of high-density residential and higher Subsection (b) Be pedestrian and transit-oriented and accessible for people with disabilities Subsection (c) Include urban services; Subsection (d) Reflect high quality urban design; Subsection (e) Emphasize open spaces, parks, and plazas to create a sense of place; Subsection (f) Develop/redevelop over time and in phases; Subsection (g) Plan for "complete streets" that are designed and operated to allow safe access for users of all modes and ability levels with a street center line mile average of no less than 30 center line miles per square mile, as a measure of street connectivity. Street grids should strive to have blocks no larger than three hundred feet by three hundred feet square. In areas where this is not possible, well-designed mid-block pedestrian and bicycle pathways could be used to accomplish a similar result; Subsection (h) Plan for sidewalks and bicycle infrastructure commensurate with population and traffic patterns, including measures of street type, vehicle volume, and speeds; Subsection (i) Plan for housing affordable to all economic segments of the population, including extremely low-, very low-, low-, and moderate- income households; Subsection (j) Include plans and regulations that encourage no net loss of affordable housing; Subsection (k) Plan and zone for a balance of residential, commercial, retail, and recreational uses. At least one housing unit shall be allowed for each employment unit in the center; Subsection (l) Develop with the community design guidelines and standards for buildings and streets that include criteria to make safe and active streetscapes,	

Topic	Policy and Goals	Discussion
	discourage uses and designs that disrupt pedestrian and bicycle flow and access, incorporate locally important characteristics and historic structures, and promote good building design; Subsection (m) Prohibit surface parking lots and at-grade parking, with the exception of on-street parking; and Subsection (n) Have good access to the local and regional transportation and transit systems. LU Policy 3.B.3: Urban Centers, Light Rail Communities, and Mixed Use Corridors shall be located adjacent to a principal arterial road and within ½ mile of a high capacity transit station. LU Policy 3.B.6: Desired growth within Urban Center, Light Rail Community, and Mixed Use Corridor designations shall be accomplished through: Subsection (a) Application of appropriate zoning classifications; Subsection (b) Provision of necessary services and public facilities, including transit, sewer, water, stormwater, roads and pedestrian improvements, parks, trails, and open space; Subsection (c) Protection of critical areas; and Subsection (d) County identification and application of methods to facilitate development within designated Urban Centers, Light Rail Communities, and Mixed Use Corridors, including transit, parks, road, and non-motorized improvements. Policy LU 2.B.2: The County shall encourage, and may require, higher minimum densities within designated urban centers, urban villages, and along connecting transit emphasis corridors to support planned transit service. Policy LU 2.B.3: Through corridor-based planning, the County shall identify opportunities for mixed-use and medium- and high-density residential development (including housing for the elderly and disabled). These uses	

Topic	Policy and Goals	Discussion
	shall be encouraged to locate within walking distance of transit facilities, particularly along transit emphasis corridors, and, where possible, near medical facilities, urban centers, parks, and recreational amenities. Corridor planning should also help identify those locations where higher densities and mixed uses can best support transit and non-motorized access. Policy LU 2.C.1: The county shall encourage the expansion, revitalization, redevelopment, and intensification of existing areas, with special focus on those located within designated centers and along transit emphasis corridors, before new sites are designated and zoned. Policy LU 2.C.2: The majority of new commercial development shall be accommodated as mixed use in urban centers, and/or urban village or adjacent to transit stations or within transit emphasis corridors. Policy LU 2.C.3: The intensification or redevelopment of existing strip commercial developments shall be encouraged including changing to mixed use in appropriate locations, particularly along transit emphasis corridors.	
Housing	HO Policy 1.D.1: The County shall establish a mix of densities in residentially zoned land that is served with adequate infrastructure based on the public's housing preferences, demonstrated need of low- and moderate-income households, preservation of critical areas, and coordination with the transportation system.	The EVLE Project would add high-capacity transit stations in areas the County has zoned for high-density mixed-use development. Following construction, remnant land could become available for redevelopment or joint development. Any TOD on surplus land owned by Sound Transit in station areas would follow the implementation strategy for Sound Transit's TOD program. Sound Transit's TOD and Real Property Excess, Surplus, and Disposition policies promote racial and social equity for development that occurs in station areas and minimize displacement potential.

SOURCE: Snohomish County (2024b).

7 BENEFITS AND DISADVANTAGES OF DELAYING IMPLEMENTATION

This section discusses the benefits and disadvantages of delaying the proposed EVLE Project instead of approving it in the near future, after completion of SEPA.

Delaying the EVLE Project would provide additional time for information gathering and to evaluate less intrusive designs. A delay would also postpone impacts associated with project construction. While some members of the community or region may perceive a delay in construction and related impacts as a benefit, delay of the EVLE Project would have adverse effects too.

Delaying the EVLE Project would postpone realizing a major component of the region's long-range plans for managing growth and transportation and the opportunity to link neighborhoods with Puget Sound regional centers. A delay would limit economic development associated with efficient movement of people and goods and could allow other public or private projects to develop that might increase the cost or complexity of implementing the EVLE Project.

A delay in the EVLE Project would inhibit the region's ability to accommodate growth and development patterns that are already taking place in the region, as articulated in local and regional plans. This could lead to several other consequences, including new development patterns, steadily increasing corridor roadway congestion, and deteriorating transit performance and reliability.

Delay of the EVLE Project would also likely increase overall costs, as building materials, property acquisition, and construction services continue to increase both regionally and nationally.

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Everett Link Extension

ATTACHMENT A

Greenhouse Gas Model Output

The tables below summarize the construction, facility operations, vehicle operations and maintenance, and displaced emissions inputs for the project. Users can navigate to the different data input screens using the associated buttons. Once the inputs are added, scroll to the Results section below to view results.

1. Select State

WA

2. Enter Analysis Period
(years)

50

Calculate Results

Construction Information

Structured Parking Spots	1,275
Surface Parking Lot Spots	275
Trees Removed	0

Transit Mode:	Miles of New Track/Alignment			Miles of Converted or Upgraded Track/Alignment	Number of Stations		
	Underground	Elevated	At-Grade		Underground	Elevated	At-Grade
Light Rail or Streetcar		16.00				7	

Facility Operations Information

Transit Mode	Building Type	Facility Square Footage
Light Rail or Streetcar	Maintenance/Storage Facility	289,484.00
Light Rail or Streetcar	Maintenance/Storage Facility	62,031.00
Light Rail or Streetcar	Maintenance/Storage Facility	8,849.00
Light Rail or Streetcar	Station	3,157.00
Light Rail or Streetcar	Station	4,754.00

Vehicle Operations & Maintenance Information

Operation Mode	Fuel Source	eGrid Subregion (if applicable)	VMT

Displaced VMT

Operation Mode	Fuel Source	eGrid Subregion (if applicable)	VMT
Sedan/Auto	Gas		39,215,316
Sedan/Auto	Diesel		-75,312
Bus/BRT	Electric	NWPP	-1,497,311

RESULTS

Calculate Results

Summary Results

GHG Emissions (MTCO₂eq)

	Upstream	Downstream	Total
Annual	1,465	-9,955	-8,490
Total Analysis Period	73,254	-497,732	-424,478

Energy Use (mmBTU)

	Upstream	Downstream	Total
Annual	78,470	-131,289	-52,819
Total Analysis Period	3,923,488	-6,564,438	-2,640,949

Detailed Results

GHG Emissions (MTCO₂eq)

	Upstream	Downstream	Total
Construction	3,262	327	3,589
Transitway Maintenance	0	71	71
Facility Operations	0	2,567	2,567
Vehicle Operations	0	0	0
Vehicle Maintenance	0	0	0
Displaced Emissions	1,797	12,920	14,717
Cumulative Emissions	1,465	-9,955	-8,490

Annual Results

GHG Emissions (MTCO₂eq)

	Upstream	Downstream	Total
Construction	163,088	16,373	179,460
Transitway Maintenance	0	3,536	3,536
Facility Operations	0	128,354	128,354
Vehicle Operations	0	0	0
Vehicle Maintenance	0	0	0
Displaced Emissions	89,834	645,995	735,829
Cumulative Emissions	73,254	-497,732	-424,478

Total Analysis Period

Energy Use (mmBTU)

	Upstream	Downstream	Total
Construction	96,072	3,342	99,414
Transitway Maintenance	0	720	720
Facility Operations	0	20,484	20,484
Vehicle Operations	0	0	0
Vehicle Maintenance	0	0	0
Displaced Emissions	17,602	155,835	173,437
Cumulative Emissions	78,470	-131,289	-52,819

Energy Use (mmBTU)

	Upstream	Downstream	Total
Construction	4,803,603	167,105	4,970,708
Transitway Maintenance	0	36,000	36,000
Facility Operations	0	1,024,188	1,024,188
Vehicle Operations	0	0	0
Vehicle Maintenance	0	0	0
Displaced Emissions	880,115	7,791,731	8,671,846
Cumulative Emissions	3,923,488	-6,564,438	-2,640,949