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BEFORE THE SURFACE TRANSPORTATION BOARD

NORMI MALENG
PROSECUTING ATTORNEY
CIVIL DIVISION

Docket AB 508X

THE LAND CONSERVANCY OF SEATTLE AND KING COUNTY
--ABANDONMENT EXEMPTION--
IN KING COUNTY, WASHINGTON

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Department of Parks
and Recreation

PETITION FOR EXEMPTION

The Land Conservancy of Seattle and King County ("TLC") petitions the Surface Transportation Board ("STB" or "Board") to exempt, pursuant to 49 U.S.C. § 10502, TLC's abandonment of 12.45 miles of rail line from the prior approval requirements of 49 U.S.C. §§ 10903-10905.¹

I. PROPOSED TRANSACTION

TLC proposes to abandon its rail line between Milepost 7.30 in Redmond and Milepost 19.75 in Issaquah, a distance of 12.45 miles, in King County, Washington.

Copies of a "statement of willingness," filed on behalf of King County pursuant to 49 C.F.R. § 1152.29 invoking section 8(d) of the National Trails System Act, 16 U.S.C. § 1247(d), are also provided herewith (Exhibit A). The "statement of willingness" requests the issuance of a "Notice of Interim Trail Use" ("NITU"). TLC consents to, and joins in, the request for a NITU to be issued. Contingent upon issuance of an effective

¹ As explained below, TLC seeks an exemption for Sections 10904 and 10905 for the Line, which TLC has agreed to sell King County (Washington) for interim trail use and railbanking. See Blue Mountain Railroad -- Abandonment Exemption -- in Whitman County, WA and Latah County, ID, AB-485X, served March 4, 1997.

NITU, TLC intends to transfer the rail line to King County for interim trail use and railbanking purposes.

Because King County tenders herewith a "statement of willingness" and because TLC consents to its issuance, a railbanking order may be issued immediately, and the parties so request, rather than a mere abandonment authorization.

A map of the line is attached as Exhibit B.

The line appears to contain approximately one mile of federally-granted right of way. In compliance with 49 C.F.R. § 1152.60(d), TLC states as follows: "Based on information in our possession, the line does contain federally granted right-of-way. Any documentation in petitioner's possession will be made available to those requesting it."

II. EXPEDITED CONSIDERATION REQUESTED

TLC has entered into a memorandum of understanding (MOU) with King County Open Space, an agency of King County, Washington, agreeing to sell, at a price not exceeding fair market value, the rail line to King County, Washington, for interim trail use and railbanking after the line is authorized for abandonment by STB. The rail line parallels the shoreline of Lake Sammamish between Redmond and Issaquah, and connects two major parks: Marymoor Park in Redmond, and Lake Sammamish State Park in Issaquah. In addition, the rail line if converted to trail use will serve not only as an extension of Seattle's widely popular Burke-Gilman Trail, but also supply the last remaining "missing link" for a cross-State trail linking

Seattle with Idaho. Creation of a trail along the east side of Lake Sammamish has been a goal stated in King County planning documents since at least 1971 -- for over a quarter century. The rail corridor has long been viewed as an appropriate trail corridor if it became available. The King County Council has appropriated initial funds for acquisition of the rail line once railbanked, and the County Parks Department has initiated planning activities. King County has advised TLC that it wishes to acquire the corridor as quickly as possible for planning, budgeting, and development purposes.

Additionally, the Washington State Department of Transportation (State DOT) has requested TLC to obtain railbanking/abandonment authorization expeditiously so the State may avoid approximately \$180,000 in superfluous expenses for unnecessary crossing improvements at an interchange with I-520 near Redmond. The State seeks expeditious treatment of TLC's abandonment petition, prompt entry of a railbanking order, immediate effectiveness of the order, and an exemption from the OFA provisions of § 10904 because its work on I-520 has already commenced and an effective railbanking order is required as soon as possible in order to avoid unnecessary taxpayer expense. A letter from the State DOT supporting this petition and the relief sought herein is attached as Exhibit C.

In order to facilitate a speedier transfer of the rail corridor to King County, TLC urges the Board (a) to issue a Decision and Notice of Interim Trail Use or Abandonment

directly ("NITU") , and (b) to make the NITU effective on or shortly after the date of decision.²

III. DESCRIPTION

TLC acquired the rail line from Burlington Northern and Santa Fe Railway Company ("BNSF") in April 1997.³ The rail line historically had been used to transport coal, dairy products, and miscellaneous freight. According to BNSF records, since at least 1994, the only significant user has been Darigold (outbound bulk butter). Marenakos Rock Center has employed the line once in 1994 for inbound rock products, and a few times for same in 1995, with no use in 1996. In August 1996, BNSF suspended operations on the line due to track deterioration.⁴ There have been no shipments since that time. The State DOT advises that it estimates that rehabilitation costs are in the

² There have been only two shippers on the line in the past three years: Darigold, Inc., and Marenakos Rock Co. We are authorized to state that neither opposes abandonment or railbanking. Under these circumstances, the decision can be made effective immediately.

³ See STB Finance Docket No. 33389, The Land Conservancy of Seattle and King County -- Acquisition and Operation Exemption -- The Burlington Northern and Santa Fe Railway Company, served April 30, 1997.

⁴ Traffic is as follows:

Shipper	1994	1995	1996
Marenakos Rock	1 (in)	6 (in)	0
Darigold	449 (out)	361 (out)	276 (out)

range of \$500,000 to \$600,000.⁵ Darigold is relocating its bulk butter operations and supports TLC's petition for an abandonment exemption as well as acquisition of the property for interim trail use and railbanking by King County. A letter from Darigold supporting this petition and the relief sought herein is attached as Exhibit D. Marenakos Rock Center has authorized counsel to state that it will not oppose abandonment or railbanking.⁶

IV. EXEMPTION REQUESTED

TLC seeks an exemption under 49 U.S.C. § 10502 from the applicable requirements of 49 U.S.C. §§ 10903-10905 in order to abandon this 12.45 mile line of railroad. Under 49 U.S.C. § 10502, STB must exempt a transaction from regulation when it finds that:

- (1) regulation is not necessary to carry out the rail transportation policy of 49 U.S.C. § 10101; and
- (2) either:
 - (a) the transaction is of limited scope, or
 - (b) regulation is not necessary to protect shippers from the abuse of market power.

The legislative history of section 10502 reveals a clear Congressional intent that STB should liberally use its exemption authority to free certain transactions from the administrative and financial costs associated with continued regulation. In enacting the Staggers Act of 1980, P.L. No. 96-448, 94 Stat. 1895, Congress encouraged STB's predecessor to liberally use the

⁵ See Exhibit C.

⁶ Contact personnel are John or Brad Reeves, 206-392-3313.

expanded exemption authority under former Section 10505:

The policy underlying this provision is that while Congress has been able to identify broad areas of commerce where reduced regulation is clearly warranted, the Commission is more capable through the administrative process of examining specific regulatory provisions and practices not yet addressed by Congress to determine where they can be deregulated consistent with the policies of Congress. The conferees expect that, consistent with the policies of this Act, the Commission will pursue partial and complete exemption from remaining regulation.

H.R. Rep. No. 1430, 96th Cong., 2d Sess. 105 (1980). See also Exemption from Regulation -- Boxcar Traffic, 367 I.C.C. 424, 428 (1983), vacated and remanded on other grounds, Brae Corp. v. United States, 740 F.2d 1023 (D.C.Cir. 1984). Congress reaffirmed this policy in the conference report accompanying the ICC Termination Act of 1995, P.L. No. 104-88, 109 Stat. 803, which re-enacted the rail exemption provisions as Section 10502. H.R. Rep. No. 422, 104th Cong., 1st Sess. 168-69 (1995).

A. The Application of 49 U.S.C. § 10903 Is Not Necessary to Carry Out the Rail Transportation Policy

Detailed scrutiny of this transaction is not necessary to carry out the rail transportation policy. An exemption would minimize the unnecessary expenses associated with the filing of a formal abandonment application, expedite regulatory decisions, and reduce regulatory barriers to entry [49 U.S.C. 10101(2) & (7)]. By abandoning the line, TLC will be able to avoid the significant rehabilitation and maintenance costs necessary on the line, and to apply its assets more productively elsewhere. Granting this exemption accordingly will foster sound economic conditions and encourage efficient management by

permitting the rationalization of a redundant rail line. 49 U.S.C. § 10101(3), (5) & (9). Moreover, by allowing TLC to abandon the line, STB enables TLC to transfer the line to King County, which intends to preserve the line for possible future rail reactivation (railbanking) and to use it in the interim as a pedestrian and bicycle trail. Additionally, the State DOT can avoid an estimated \$180,000 in unnecessary crossing expenses. Other aspects of the rail transportation policy are not affected adversely. For example, competition and the continuation of a sound rail transportation system are not affected because the public will not be deprived of any significant rail services. In any event, since railbanking is planned, the corridor will be preserved for possible future use.

B. This Transaction Is of Limited Scope

The proposed transaction is of limited scope. TLC is seeking to abandon a line totalling some 12.45 miles which traverses a predominantly residential area. In the past three years, there have been only two shippers on the line, and only one of these has averaged more than a handful of cars per year. Both shippers are near Interstate Highway 90, and have available shipping alternatives. The major shipper supports TLC's petition and the other shipper (no shipments last year and only 7 cars over the past three years) has indicated no opposition. The shortness of the line, the limited geographic area involved, and the lack of need demonstrate the limited scope of TLC's proposed abandonment.

C. This Transaction Will Not Result In an Abuse of Market Power

Neither shipper opposes abandonment. The area in question is served by Interstate Highway 90; truck service is readily available. Other railheads providing service are nearby. Regulation is plainly not necessary to protect shippers from an abuse of market power.

Because neither of the two shippers who have been served by the line in the past three years opposes abandonment, TLC expects no bona fide opposition to the proposed abandonment.

V. EXEMPTION FROM SECTIONS 10904
AND 10905 IS WARRANTED

TLC intends to sell the rail corridor to King County for use as a bicycle and pedestrian trail and for railbanking purposes as soon as the proposed abandonment is authorized. TLC accordingly also seeks an exemption from 49 U.S.C. §§ 10904 and 10905.

A. Exemption from § 10904 Is Warranted

As previously explained, the major shipper is relocating its rail-dependent operations, and supports the relief sought herein, including specifically exemption from § 10904 provisions. The other shipper (no shipments last year) has authorized TLC to state that it is not opposed to abandonment or railbanking of the line. Neither BNSF nor TLC are aware of any other bona fide demand for rail service along the line. In any event, reinstatement of rail freight service under Section 10904 is economically not feasible at this time. The Washington State

Department of Transportation estimates that rehabilitation would cost approximately \$500,000 to \$600,000. TLC's internal estimate, which takes into account damage to the roadbed due to this past winter's extraordinary weather conditions, is \$900,000 to \$1,000,000 for rehabilitation. Additionally, reinstatement of freight service at this time is incompatible with King County's use of the line for a bicycle and pedestrian trail. TLC has entered into an MOU for the sale of the line at a price not exceeding fair market value to a public entity (King County) for that purpose. King County has filed a "statement of willingness" and TLC has consented.

This situation offers even more persuasive grounds for an exemption from §§10904-10905 than in Blue Mountain Railroad-- Abandonment Exemption -- in Whitman County, WA and Latah County, ID, AB-485X, served March 4, 1997. In the Blue Mountain case, the Board noted that exemptions from 49 U.S.C. 10904-95 "have been granted from time to time, but only when the right-of-way is needed for a valid public purpose and there is no overriding public need for continued rail service." The Board noted that the abandoning railroad in Blue Mountain had demonstrated that the right of way "was needed for a valid public purpose, i.e., interim trail" and that the two shippers supported the abandonment petition. The Board accordingly found "there is no overriding public need for continued rail service" and granted the exemption from 49 U.S.C. §§ 10904-05.

Here, King County desires the facility for interim trail

purposes; TLC has entered into an MOU envisioning such a result contingent upon STB authorization; and the State DOT desires that abandonment/railbanking be immediately authorized in order to avoid an unwarranted expenditure for unnecessary crossing work at the I-520 interchange near Redmond. Furthermore, there is no shipper opposition but instead manifest support. An exemption from 49 U.S.C. §§ 10904-05 should be granted here. See also Southern Pacific Transportation Co. -- Discontinuance Exemption -- in Los Angeles County, CA, AB 12 (Sub-no. 172X), served Dec. 23, 1994; Missouri Pacific RR Co. -- Abandonment-- in Harris County, TX, AB-3 (Sub-no. 105X), served Dec. 22, 1992; Chicago & N.W. Trans. Co. -- Abandonment Exemption -- in Blackhawk County, IA, AB-1 (Sub-no. 226X), served July 14, 1989; Iowa Northern Railway Co. -- Abandonment -- in Blackhawk County, IA, AB 284 (Sub-no. 1X) served April 1, 1988.

There is another reason for an exemption from § 10904: the purpose of the statutes would simply not be served. The policy behind § 10904 is to preserve rail lines for current or future shippers. The existing shippers all support abandonment/railbanking. There is no need to apply § 10904 to protect existing shippers. TLC and King County seek to preserve the corridor under the federal railbanking statute, which retains the corridor under STB jurisdiction for possible future rail reactivation. There is thus no need to apply § 10904 to protect the interest of future shippers.

B. Exemption from § 10905 Is Warranted

There is no need for application of 49 U.S.C. § 10905 (public use conditions). Petitioner has consented to a trail act/rail banking request filed by King County, and has entered into a memorandum of understanding providing for transfer of the line at a price not exceeding fair market value to King County (or other public entities) for trail use, railbanking, and other public purposes, contingent upon authorization by the Board. Delaying the this proceeding for further proceedings in connection with public use conditions would delay transfer for public use.

VI. ENVIRONMENTAL REPORT/HISTORIC REPORT

The environmental and historic reports, containing the information required by 49 C.F.R. §§ 1105.7 and 1105.8, are attached as Exhibit E. Certification of service is also part of this Exhibit. Responses received by TLC to the environmental and historic reports to date are also enclosed in Exhibit E.

VII. LABOR PROTECTION

The interests of railroad employees who may be adversely affected by the proposed abandonment will be adequately protected by the labor protective provisions in Oregon Short Line R. Co. -- Abandonment -- Goshen, 360 I.C.C. 91 (1979).

VIII. DRAFT FEDERAL REGISTER NOTICE

A draft Federal Register notice in the form prescribed by 49 C.F.R. §1152.60 is attached as Exhibit F. Petitioner has modified the form to indicate that petitioner also seeks exemptions from 49 U.S.C. §§ 10904-10905, and that Petitioner

has consented to a trail use/rail banking request of King County. A computer diskette (IBM compatible, WP 4.2) containing the notice is enclosed.

IX. NEWSPAPER NOTICE

A copy of the newspaper notice per 49 C.F.R. § 1105.12 and certification of publication are attached as Exhibit G.

X. SERVICE

A certificate certifying compliance with 49 C.F.R. § 1152.60(d) is attached as Exhibit H.

XI. ADDITIONAL INFORMATION

Additional letters of support are attached in Exhibit I.

XII. CONCLUSION

Application of the regulatory requirements and procedures of 49 U.S.C. §§ 10903-05, is not required to carry out the rail transportation policy set forth in 49 U.S.C. § 10101, as previously described. Moreover, STB regulation is not required to protect shippers from the abuse of market power. Finally, this abandonment is of limited scope. Accordingly TLC respectfully requests the Board expeditiously to grant this abandonment. TLC further requests that the Board issue an immediately effective railbanking authorization, and exempt this proceeding from the provisions of §§ 10904-10905.

Respectfully submitted,



Charles H. Montange
426 NW 162d Street
Seattle, WA 98177
(206) 546-1936

Attorney for The Land Conservancy of
Seattle and King County

Exhibits:

- A -- King County "Statement of Willingness"
- B -- Map
- C -- State DOT Letter of Support, Request for Expedited Treatment
- D -- Darigold Letter of Support, Request for Expedited Treatment
- E -- Environmental Report/Historic Report; Responses; Env. Notice Letter
- F -- Federal Register Notice
- G -- Newspaper notice
- H -- Service per §1152.60(d)
- I -- Additional Letters of Support

Exhibit A
King County "Statement of Willingness"

BEFORE THE SURFACE TRANSPORTATION BOARD

Land Conservancy of Seattle)
 and King county--Abandonment) AB 508X
 Exemption-- King County, WA)

Statement of Willingness to Assume Financial Responsibility

In order to establish interim trail use and rail banking under 16 U.S.C. 1247(d) and 49 CFR 1152.29, King County Department of Parks and Recreation (interim Trail User), is willing to assume full responsibility for management of, for any legal liability, arising out of (unless the user is from liability, in which case it need only indemnify the railroad against any potential liability), and for the payment of any and all taxes that may be levied or assessed against the right-of-way owned and operated by The Land Conservancy of Seattle and King County (Railroad). The property extends from MP 7.30 in Redmond to M.P. 19.75 near Issaquah, a distance of 12.45 miles in King County, Washington. The right-of-way is part of a line proposed for abandonment in Docket AB-508X.

A map depicting the property is attached

King County Department of Parks and Recreation acknowledges that use of the right-of-way is subject to the user's continuing to meet its responsibilities described above and subject to possible future reconstruction and reactivation of the right-of-way for rail service. A copy of this statement is being served on the Board.


 Name:

Title: **DIRECTOR**

King County Department of Parks and Recreation

2040--84th Avenue SE

Mercer Island, WA 98040

(206) 296-4105

Attachment

cc: Charles H. Montagne
 426 NW 162nd St.
 Seattle, WA 98177 (w/attachment)

REDMOND - ISSAQUAH, WASHINGTON

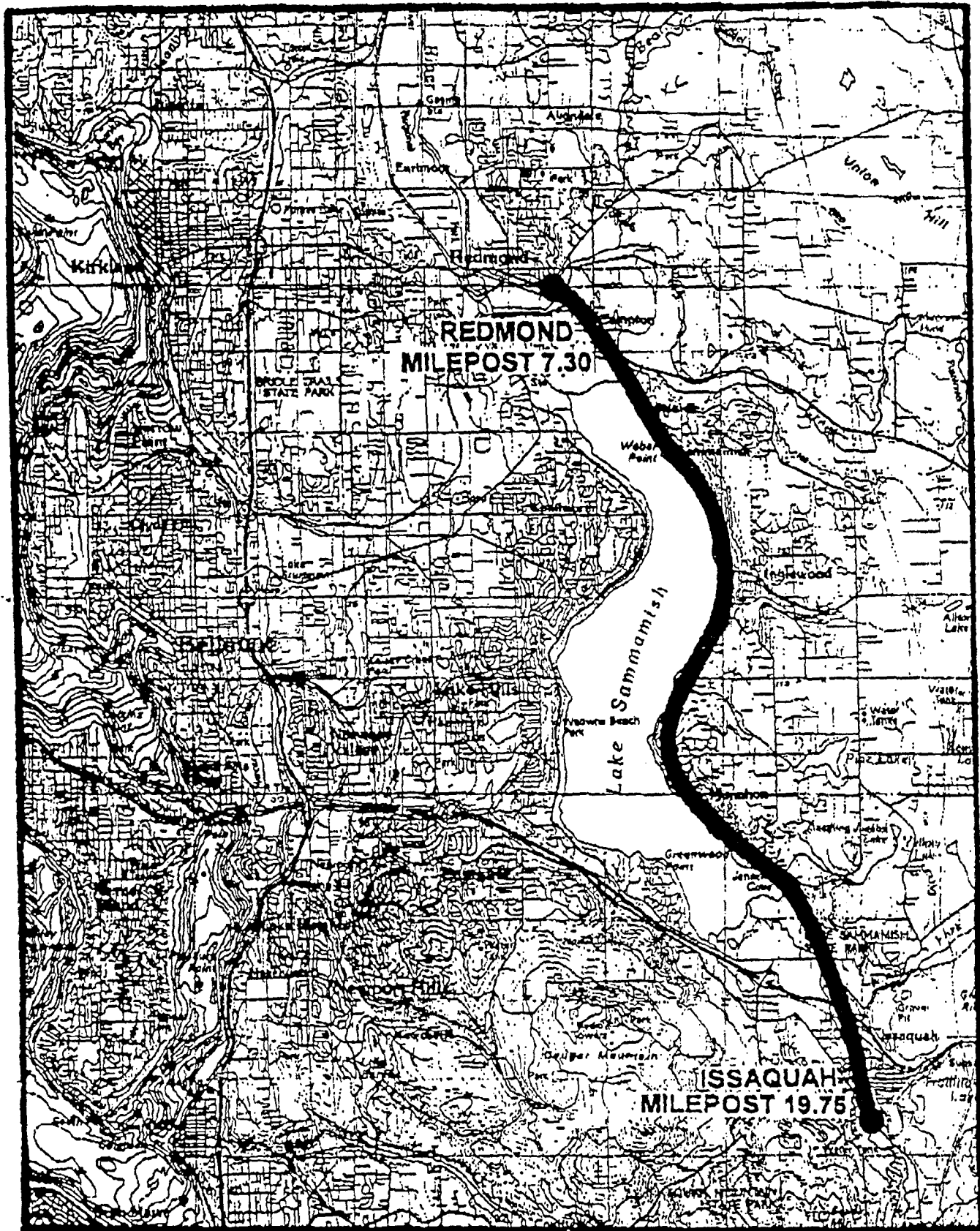


Exhibit E

Item 1: Report

BEFORE THE SURFACE TRANSPORTATION BOARD

The Land Conservancy of Seattle)
and King County -- Abandonment) AB 508X
Exemption -- King County, WA)

Environmental Report/Historic Report

The Land Conservancy of Seattle and King County (TLC or "Applicant") makes this environmental and historic report in compliance with 49 C.F.R. § 1105.7-.8 of the regulations of the Surface Transportation Board (STB) in support of a petition for exempt abandonment/railbanking of a line of railroad extending from MP 19.75 at Issaquah to MP 7.30 at Redmond, a distance of approximately 10.45 miles, all in King County, Washington. Applicant expects King County to file a "statement of willingness" invoking section 8(d) of the National Trails System Act, 16 U.S.C. § 1247(d). Applicant consents to application of section 8(d) and intends to negotiate the transfer of this line, in the event STB authorizes railbanking pursuant to section 8(d), to King County for interim trail use, railbanking, and other compatible public purposes. This action is supported by King County, the local governments (see Appendix A), and by the last remaining shipper on the line (Darigold).

The certification of service required pursuant to §1105.7(c) is attached as Appendix B.

Environmental Report

(1) Proposed Action. Applicant proposes to obtain authorization to abandon or railbank the line described above. There are no reasonable alternatives. A map delineating the

project is attached as Appendix C.

(2) Transportation System. Since the line is currently inactive for safety reasons, there will be no additional diversion of freight or passenger traffic to other modes.

(3) Land use. (i) (Local plans.) Based on consultation with local and regional planning officials, and review of official planning documents, the proposed action is consistent with existing land use plans. King County plans have long contemplated that this corridor will be preserved for open space and trail purposes. See Appendix D. Applicant's action is consistent therewith.

(ii) (Agricultural land.) Consultation with the U.S. Soil Conservation Service concerning impact on prime agricultural land is inapplicable because there is no agricultural land adjacent to the rail line.

(iii) (Coastal Zone Management Act.) In accordance with 49 C.F.R. § 1105.9, and 15 C.F.R. § 9130.57, Applicant certifies that "the proposed activity complies with Washington's approved coastal management program and will be conducted in a manner consistent with such program."

(iv) (Suitability for public use.) The corridor is suitable for alternative public uses. The corridor has long been included in King County's planning documents for trail and open space purposes. Applicant is negotiating with King County to ensure preservation of the entire corridor for public use.

(5) Energy. (i) The proposed action will not impact

transportation of energy resources.

(ii) The proposed action will not impact transportation of recyclable commodities.

(iii) The proposed action will have no significant impact on energy efficiency.

(iv) The proposed action will not result in diversion of rail to motor carriage of any traffic, and certainly not in the "trigger amounts" (1000 carloads per year, or 50 carloads per mile per year).

(5) Air. (i) Inapplicable. The proposed action will not result in increases in rail traffic, or diversions of rail to motor carriage, and certainly not in the "trigger amounts" (100% increase, or eight trains per day in rail traffic; or 10% increase in truck traffic on affected segments, or 50 vehicles per day on affected segments). The line is not currently in use for active rail freight purposes.

(ii) Inapplicable for similar reasons.

(iii) Inapplicable for similar reasons.

(6) Noise. Inapplicable.

(7) Safety. (i) (Public health and safety.) Safety should improve. Rail and motor vehicle conflicts will be further minimized. Bicyclists and hikers will be afforded a safer environment than the heavily used county road currently available between Issaquah and Redmond.

(ii) (Hazardous materials transport.) Inapplicable.

(iii) (Hazardous waste sites or spills.) None are known

in or adjacent to the rail line.

(8) Biological resources. (i) The proposed action will not likely adversely affect endangered or threatened species or areas designated as critical habitat.

(ii) No wildlife sanctuaries or refuges, national parks, or state or national forests will be affected. The project does border Sammamish State Park. The project will enhance the Park by providing additional open space and a trail and wildlife corridor connection north as far as Redmond.

(9) Water. (i) The action is consistent with applicable Federal, State or local water quality standards.

(ii) Since the proposed action will not entail any construction resulting in off-rail roadbed disturbance, no section 404 permit should be required. No designated wetlands or 100 year flood-plains will be affected.

(iii) For similar reasons, no section 402 permits should be required.

(10) Proposed mitigation. Applicant anticipates no adverse environmental impacts to mitigate.

Historic Report

In compliance with § 1105.8(d), Applicant states as follows:

(1) Map. A U.S.G.S. topographic map is attached as Appendix E.

(2) Description of rail line. The railroad corridor varies in width from approximately fifty feet to 200 feet or

more. The corridor is located on the east side of Lake Sammamish, generally parallel to East Lake Sammamish Parkway, on rolling terrain in the foothills of the Cascade Mountains. The property is chiefly residential suburban in character, with many single family dwellings or vacation homes or cottages. In Issaquah, the rail line abuts commercial and industrial parcels.

(3) Photographs of railroad structures 50 years old or older. There are no railroad structures which are fifty years old or older. Supply of photographs of said structures and their surrounding area is thus inapplicable.

(4) Data concerning such structures. Inapplicable. Applicant is aware of no railroad structures fifty years old or older.

(5) Brief narrative history. To Applicant's knowledge, the original railroad (Seattle, Lake Shore & Eastern Ry, "SLSE") was incorporated in 1885. Service commenced to Gilman (present day Issaquah) in 1888, serving coal mining interests and providing passenger service. The line ultimately became part of the Northern Pacific (approximately 1892) and later Burlington Northern Railroad (approximately 1970) systems. Commencing in the early 1970's, the Lake Shore to Woodinville portion of the SLSE line became Seattle's much-used Burke-Gilman Trail.¹ The

¹ This trail has subsequently been extended to Ballard in Seattle and to Marymoor Park in Redmond. The rail segment at issue in this proceeding will intersect with the extension of the Burke-Gilman Trail at Marymoor Park, raising the potential of recreating the old SLSE, but as a trail. In addition, as noted in the SCAT Committee letter (Appendix A), this corridor, if preserved as open space and trail, "is the last major link in

rail line corridor from Redmond to Issaquah has been included in King County planning documents as a trail corridor since 1971, should cessation of rail service occur. Burlington Northern announced that the Redmond to Issaquah track segment was under study for abandonment as early as 1981. The City of Issaquah acquired the former Northern Pacific depot in Issaquah in 1984. The last shipper served was Darigold, Inc., in the summer of 1996. The line was embargoed for safety reasons by the prior owner, The Burlington Northern and Santa Fe Railway Company, in August 1996.

(6) Documents available concerning historic structures. Inapplicable. There are no known historic railroad structures, and Applicant has no documents concerning same.

(7) Opinion on historic sites. Applicant does not believe that the site or structures in the site meet the criteria for listing in the National Register of Historic Places. Applicant does not believe that there is a likelihood of archeological resources or any previously unknown historic properties in the project area. The basis for this opinion is primarily the lack of any railroad structures in this line and the residential and vacation home development adjacent to the line.

(8) Activity which might affect recovery of archeological resources, and description of surrounding terrain. Other than original roadbed construction, and construction activity by

the connection of a trail that will extend from the city of Seattle to the Washington/Idaho state border."

neighboring landowners, Applicant is unaware of conditions which will affect the archeological recovery of resources. The surrounding terrain includes the rolling slopes of the foothills to the Cascade Mountains.

Appendix A: Letters of support -- National Park Service, The Squak, Cougar and Tiger ("SCAT") Interagency Committee

Appendix B: Certification of Service

Appendix C: Map

Appendix D: King County planning documents (1971, 1990, 1992)

Appendix E: USGS Map