



August 22, 2016

Mr. Scott Sproul
Acting Director of Community Development
City of Federal Way
Community Development Department
33325 8th Avenue South, 2nd Floor
Federal Way, WA 98003

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Executive Director

Re: Preferred Freezer / Orca Seafoods Use Process III Application,
Project Number 16-102947-00-UP

Dear Mr. Sproul:

Historic Seattle would like to submit this comment letter on the proposed Preferred Freezer / Orca Seafoods development project at the Weyerhaeuser Headquarters (HQ) site. Founded in 1974, Historic Seattle is dedicated to preserving Seattle’s and King County’s architectural legacy through education, advocacy, and preservation.

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We have reviewed the applicant’s SEPA checklist and find the response to be woefully inadequate as related to Section B.13., Historic and Cultural Resources. The applicant’s response references the National Register of Historic Places criteria for evaluation and concludes that the “Weyerhaeuser Headquarters has not achieved significance in the past 50 years.” This is a false statement not grounded in any professional analysis.

A simple internet search yields an immense amount of information about the Weyerhaeuser HQ’s history, architecture, landscape design, and significance. The Weyerhaeuser HQ stands out even among the pantheon of other modernist corporate office sites in the country, and is particularly notable for its integration of landscape and building design and its groundbreaking open floor plan concept. The project is an outstanding example of the work of architecture firm Skidmore Owings and Merrill (SOM) and landscape architecture firm Sasaki, Walker and Associates (SWA). Completed in 1971, the Weyerhaeuser HQ project is still featured on the websites of these two firms.

In our professional opinion, we believe the Weyerhaeuser HQ is clearly eligible for listing on the National Register of Historic Places because of its exceptional importance. It has achieved significance within the last fifty years. The project’s architectural achievements were acknowledged shortly after completion when it received a 1972 National Honor Award from the American Institute of Architects (AIA). And in 2001, thirty years

**1117 Minor Avenue
Seattle, WA 98101**

(206) 622-6952
INFO@HISTORICSEATTLE.ORG
WWW.HISTORICSEATTLE.ORG

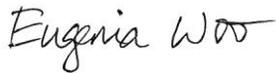
later, the project received the AIA's *Twenty-five Year Award*, an honor that "showcases buildings that set a precedent. Conferred on a project that has stood the test of time for 25-35 years and continues to set the standards of excellence for its architectural design and significance."

Historic Seattle has requested a Determination of Eligibility (DOE) letter from the State Architectural Historian at the Department of Archaeology and Historic Preservation (DAHP). When we receive this letter, we will submit it to the City of Federal Way for your records.

We ask the City to carefully review this comment letter and others you may receive that support a more comprehensive analysis of historic and cultural resources. The proposed massive development adjacent to one of the most significant, historic modern sites in the state will greatly impact the entire Weyerhaeuser grounds, not just from a historic and cultural resources standpoint but also from the environmental impact of the removal of a large swath of forest land and critical wetlands area. Please consider these impacts seriously and seek the consultation of those in the preservation field who may offer expertise for further evaluation.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Eugenia Woo".

Eugenia Woo
Director of Preservation Services
Historic Seattle

Cc: Kji Kelly, Executive Director Historic Seattle
Michael Herschensohn, Chair, Historic Seattle Council
Dr. Allyson Brooks, State Historic Preservation Officer (DAHP)
Michael Houser, State Architectural Historian (DAHP)