



April 24, 2017

Ms. Stacey Welsh
Senior Planner
City of Federal Way
33325 8th Avenue South
Federal Way, Washington 98003

In future correspondence please refer to:
Project Tracking Code: 2016-08-06001
Re: Preferred Freezer/Orca Bay Seafoods Notice of Master Land use Applications

Dear Ms. Welsh:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. Your communication includes:

- a) 8/10/2016 letter from State Archaeologist Rob Whitlam to the U.S. Army Corps of Engineers (USACE) (DAHP ID 2016-08-05720)
- b) The first cultural resources report by Tetra Tech for Talasaea Consultants, Inc.
- c) The revised cultural resources report by Tetra Tech reflecting a revised project location
- d) 4/5/2017 letter from ESM Consulting Engineers, LLC to you regarding the revised and supplemental Process III application materials for the Greenline Warehouse "A" project, formerly known as Preferred Freezer/Orca Bay.

In response, the documents have been reviewed by Rob Whitlam and myself in regard to the revised project area and recommendations made to the City of Federal Way in our 8/23/2017 regarding impacts of the Preferred Freezer/Orca Bay Seafoods Master Land Use Applications. As a result of our review, we are providing the following comments/recommendations:

- 1) We concur with the findings of the two Tetra Tech reports regarding archaeological resources in the project area of potential effect (APE) for the first and revised project areas.
- 2) While addressing archaeological resources in the two project areas, the reviewed materials are not responsive to our recommendations to conduct a comprehensive survey and inventory of the former Weyerhaeuser headquarters campus. As clearly stated in our letter, we request and recommend that the campus be surveyed and recorded by professionals with expertise in architectural history as well as cultural resources to document historic and cultural resources on the entire campus. Our recommendations are reprinted here as follows:

Therefore, an inventory of the proposed site and surrounding Weyerhaeuser campus is needed to help evaluate the property for its historical and architectural significance. This information is needed to assist the City and DAHP in fully



evaluating the impact of the application on this highly visible and prominent location.

3. In order to complete inventory data requested in #2, we recommend that the Weyerhaeuser campus be inventoried by qualified cultural resource professionals with expertise in architectural history and archaeology and using DAHP's on-line Historic Property Inventory and Archaeological Site Inventory databases.

4. Given the high potential that the subject site and surrounding Weyerhaeuser property is significant for its design, landscape, and plan, we recommend that the City consider the impact of the proposal on the character and quality of this location and on Federal Way's heritage as well as its future.

Please note that our recommendation includes an evaluation of the property for its historical and architectural significance. Design, landscape, and plan are specifically called out as areas of significance that need to be addressed during the survey process.

- 3) The letter from TSM that excerpts portions of an environmental checklist that states: "We do not question whether the building would be eligible for listing, but assert that listing this building is not necessary for the proposed project." As a clarification, DAHP's recommendation is **not a** request for listing of the Weyerhaeuser building or associated resources in the National Register of Historic Places. Rather, we are recommending that the property be **surveyed and inventoried** in order to document the historical and architectural significance of the site for future planning purposes. A National Register listing is an honorary recognition that follows a defined nomination process; whereas a survey and inventory of cultural and historic resources is a planning tool and database for informed design-making. More information about both processes can be found by visiting our website at www.dahp.wa.gov.

Thank you for the opportunity to review and comment. If you have any questions, please contact me at greg.griffith@dahp.wa.gov or 360-586-3073.

Sincerely,



Gregory Griffith
Deputy State Historic Preservation Officer

C: Karen Meador, Historical Society of Federal Way
Chris Moore, Washington Trust for Historic Preservation
Eugenia Woo, DocommoWeWa

