

August 22, 2016

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

Re: Preferred Freezer/Orca Bay Seafoods Use Process III Application (File #16-102947-00UP)

Dear Mr. Sproul:

The Washington Trust for Historic Preservation, Washington's state-wide historic preservation non-profit advocacy organization, is writing in reference to the Preferred Freezer/Orca Bay Seafoods development proposed to be built on the grounds of the former Weyerhaeuser International Corporate Headquarters. The proposal to build a 7.2 acre warehouse and parking lot on existing forested wetland of the monumental former corporate headquarters is alarming given the historic and architectural significance of the building and surrounding landscape.

We are concerned that the applicant has not fully complied with SEPA checklist Section B.13 requirements and request that the applicant be required to submit a Historic Property Inventory form to the Department of Archeology and Historic Preservation for an official determination of eligibility. The applicant's response that the building has "not achieved significance in the past 50 years" is not supported with evidence or consultation with parties qualified to make that determination. The building is eligible for listing on the National Register of Historic Places under Criterion C with the attention that the property also falls within Criteria Consideration G for a property achieving significance within the past 50 years and holding exceptional importance.

There are few buildings, especially of this size, so deeply integrated into the surrounding landscape. The united exterior and interior landscape is enhanced by the interior design which pioneered the "open-office" plan in America, free of any partitions. The interior layout allowed employees and visitors to take-in the surrounding landscape from almost any location inside the building. Visual interference with the expansive views of the landscape was minimized by the use of silicon-sealed butt joints between the plate glass window panels instead of mullions, another lasting and revolutionary design forged in this building.

When viewed from above, the only obvious constructed structure on the site is the fifth-floor executive penthouse; floors 1-4 appear to be a terraced element built into the landscape. The original architect, Skidmore, Owings and Merrill (SOM), and landscape architect, Pete Walker of Sasaki, Walker

Associates, both worked with Weyerhaeuser to select the site and design the land for the project. SOM partner Edward Charles Bassett strived to, "find a point where the landscaping and the building simply could not be separated, that they were each a creature of the other and so dependent that they could hardly have survived alone." The forested wetland area proposed for the development of the Preferred Freezer/Orca Seafoods warehouse was intentionally sculpted, underbrush was removed, and woodland trails were created for the recreational enjoyment of Weyerhaeuser employees.

The significance of the building and landscape has been lauded since its completion in the early 1970s. A 1972 article in Architectural Forum praised the design shortly after completion with a bold statement: "Weyerhaeuser will rank among the lasting contributors to an American architecture." In addition to receiving awards for design and energy conservation shortly after completion, in 2001 the Weyerhaeuser Headquarters received the 25-year award from the American Institute of Architects. Awarded to one project annually, the 25-year award recognizes buildings that exemplify design of enduring significance. Although this award traditionally recognizes only architectural elements, in nominating the Weyerhaeuser Headquarters for the award, Louis R. Ponders, a member of the AIA's Committee on Design, wrote: "The Weyerhaeuser Headquarters is a milestone project. It is the perhaps one of the most famous and one of the earliest examples of a large corporate headquarters complex that has been totally integrated with its natural setting, becoming an integral part of the landscape." One thing is clear; the exterior and interior landscapes give the Weyerhaeuser headquarters lasting architectural value.

The 19 acre area proposed for redevelopment is a critical and planned element of the historic landscape that would suffer permanent damage by several elements of this proposal that interfere with the intentional design of the site. The process of a formal, educated, determination of eligibility and significance of the entire site must be completed to adequately inform future development. Thank you for considering our request to respect the future of the entire property and its lasting importance to the community.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Moore".

Chris Moore
Executive Director
Washington Trust for Historic Preservation