



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

November 8, 2018

Ms. Stacey Welsh
Senior Planner
City of Federal Way
33325 8th Avenue South
Federal Way, WA 98003-6325

In future correspondence please refer to:

Project Tracking Code: 2016-08-06001

Re: Greenline Warehouse "A" File No: 16-102948-SE (formerly Preferred Freezer/Orca Bay Seafoods Notice of Master Land use Applications

Dear Ms. Welsh:

The Washington State Department of Archaeology and Historic Preservation (DAHP) has reviewed the Notice of Mitigated Determination of Nonsignificance (MDNS) prepared by the City of Federal Way. This was received from a concerned citizens group. We understand that the applicant proposes construction of a 45 foot-tall, 225,950 square-foot general commodity warehouse with 287 parking spaces and associated site work, including wetland fill located on a parcel that is part of the former Weyerhaeuser Corporation headquarters campus. It is our understanding that this proposal is a re-submittal of the Preferred Freezer/Orca Bay Seafoods application to the City made in August of 2016 and to which DAHP provided letters with comments and recommendations dated August 23, 2016 and April 27, 2017 (copies attached).

In response and based upon our review of the MDNS we are providing the following comments and recommendations:

A. DAHP **does not** agree with the MDNS determination for this application. This determination is based upon our review of the MDNS indicating that our previously submitted comments were not appropriately considered during the review and comment period. Citing from our April 24, 2017 letter, our comments/recommendations are excerpted herein as follows:

- 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.

In order to complete inventory data requested, 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.

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.

- B. In our October 31, 2017 letter (copy attached) to an interested member of the public, DAHP issued the opinion that the campus is eligible for the National Register of Historic Places summarizing: "...the Weyerhaeuser Headquarters would easily qualify for listing on the National Register of Historic Places (under criteria A & C) as a ground breaking design that has been studied by generations of architects, architectural historians, landscape architects and historians."
- C. Based upon the above considerations and previously stated recommendations, we recommend the MDNS is not an appropriate finding and a thorough exploration of alternative proposals be conducted. In the event that the current proposal is accepted, we recommend that additional mitigation measures be identified and included in the City's determination document.
- D. In the event that the proposal is found to be subject to the Section 106 of the National Historic Preservation Act consultation process due to a federal nexus, our recommendations may be revised.
- E. Finally, In future, please notify DAHP of the City's SEPA notification and decision-making process related to this and other proposals being reviewed by the City. To help us expedite our review process, please email all SEPA documents to DAHP's email in-box at SEPA@dahp.wa.gov.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,



Holly Borth
Project Compliance Reviewer
(360) 586-3533
holly.borth@dahp.wa.gov

cc: Laura Murphy (THPO, Muckleshoot Indian Tribe);
Brandon Reynon (THPO, Puyallup Tribe);
Steve Mullen-Moses (THPO, Snoqualmie Indian Tribe);
Rhonda Foster (THPO, Squaxin Island Tribe);
Dennis Lewarch (THPO, Suquamish Tribe);
Richard Young (Tulalip Tribes);
Jennifer Mortenson, Chris Moore (Washington Trust of Historic Places);
Jennifer Meisner (King County Historic Preservation Program);
Jean Parietti (Save Weyerhaeuser Campus);



Lance Lundquist (US Army Corps of Engineers);
Eugenia Woo (Docomomowewa)

