

November 9, 2018

Brian Davis, Community Development Director
City of Federal Way
33325 8th Avenue South
Federal Way, WA 98003

Re: MDNS Greenline Warehouse "A"

Dear Mr. Davis:

The Washington Trust for Historic Preservation is writing in reference to the Mitigated Determination of Nonsignificance recently released by the City of Federal Way in regards to the proposed Warehouse "A" on the property now known as the Greenline, formerly the Weyerhaeuser Corporate Campus. The Washington Trust strongly disagrees with the City's determination and is very concerned by the continued failure of the City to adequately to recognize and address the architectural and design significance of this campus.

The significance of this campus has been detailed in many previous letters written in response to various project proposals by this applicant, sent to the City by the Washington Trust and others over the course of the past two years. (See letters from the Washington Trust dated August 22, 2016, October 27, 2017, & June 4, 2018.) Additionally, the Department of Archaeology & Historic Preservation (DAHP) formally deemed the nearby former headquarters building "easily" eligible for the National Register and indicated that the entire campus, including this project site, is likely eligible as well. Unfortunately, the City has failed to initiate or require any sort of formal review of the camps for historic or design significance. The Washington Trust and DAHP have made multiple requests that an inventory or survey of the entire campus be completed by a qualified cultural resource professional. This would allow the city and all parties involved to fully evaluate the impact this proposal will have on the campus, along with Warehouse "B" and the Greenline Business Park projects.

A proper historic survey of the entire campus, including its landscaping features, is necessary to adequately respond to SEPA checklist Section B.13 for the Warehouse "A" project. The need for such a review of the campus is clearly demonstrated by the fact that the mitigation measures the City is requiring for Warehouse "A" do not address the historic or design features of the subject property or the surrounding campus in any way. The Washington Trust finds this unacceptable due to the immense importance that the history and design of this campus has to Washington State. We have made previous suggestions for reducing the negative effects that this applicant's projects will have on the historic and design features of the campus (specifically the letters dated October 27, 2017 & June 4, 2018). In addition to our previous suggestions of reducing building sizes and increasing tree buffers, the Washington Trust would also suggest the City require the applicant to nominate portions of the campus to become a City of Federal Way Landmark as part of mitigation. A full and thorough survey of the campus would allow for the analysis that will be necessary to determine the most appropriate mitigation.

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The Washington Trust believes that modest development that is sensitive to the holistic design of the campus would be possible with minimal negative impact to the historic character of the campus, but the City is not even attempting to address the issue of design compatibility and is seemingly ignoring the significance of the campus design all together. Due to the exceptional historic and architectural caliber of the campus, new buildings must be sensitive to the original design philosophy of the campus.

We urge the City of Federal Way to require a more thoughtful approach to new construction on this campus and require mitigation measures that address the real and significant impact Warehouse "A" and other projects will have on the campus. Thank you for considering our request to respect the future of the entire property and its lasting importance to the Federal Way and Washington State.

Sincerely,



Jennifer Mortensen
Preservation Services Coordinator

CC: Greg Griffith & Holly Borth, Department of Archaeology and Historic Preservation
Lori Sechrist & Jean Parietti, Save Weyerhaeuser Campus
Lance Lundquist, Army Corps of Engineers
Jennifer Meisner, King County Historic Preservation Program
Eugenia Woo, Docomomo WEWA