



DEPARTMENT OF THE ARMY  
CORPS OF ENGINEERS, SEATTLE DISTRICT  
P.O. BOX 3755  
SEATTLE, WASHINGTON 98124-3755

Regulatory Branch

October 20, 2020

Save Weyerhaeuser Campus  
PO Box 702440245  
Federal Way, WA 98063

Reference: NWS-2017-1077  
Woodbridge Corporate  
Park Building A & B  
Adverse Effect

The U.S. Army Corps of Engineers (Corps) Regulatory Branch has received a permit application from Federal Way Campus, LLC associated with a commercial development project located in Federal Way on private land at the former Weyerhaeuser campus, at Sec 21, T21N, R04E, Poverty Bay USGS 7.5' quadrangle, King County, Washington. The applicant proposes to discharge up to 800 cubic yards of permanent fill in 9,922 square feet (SF) of nine Category III and IV wetlands, 17,046 SF of wetland buffer reduction, and 2,951 SF of stream buffer reduction to construct up to 439,050 SF of new building space with associated infrastructure, parking and stormwater facilities. The applicant proposes to purchase 13.53 acre points from the King County Mitigation Reserves Program as compensatory mitigation for wetland loss. Wetland buffers and stream buffers would be averaged by 20,720 SF of on-site wetland buffer replacement and 3,025 SF of on-site stream buffer replacement. The Corps is evaluating the undertaking in compliance with Section 106 of the National Historic Preservation Act. The Corps' permit area is defined by all areas of proposed in-water activity, including upland areas where work is directly associated, integrally related, and would not occur but for the in-water authorized activity. In evaluating the effects of the Corps' permitting actions to historic properties, the Corps takes into consideration historic properties both within and beyond the permit area.

Cardno prepared three reports on the results of their cultural resources assessment of the project area. The first report, *Archaeological Resources Survey for the Woodbridge Corporate Park Building A and Building B Projects, Federal Way, Washington*, dated March 30, 2020, is an archaeological survey of the 32.2-acre Corps' permit area. The second report, *Built Environment Survey of the Former Weyerhaeuser Corporate Headquarters Campus, Federal Way, Washington*, dated July 29, 2020, is a built environment assessment of the approximately 490-acre Weyerhaeuser campus, and includes areas outside the Corps' permit area. The final report,

*Evaluation of Effects for the Proposed Woodbridge Building A and Woodbridge Building B Projects, Federal Way, Washington*, dated October 15, 2020, is a permit-specific assessment of project effects to historic properties. Information on the project is available online on the Washington Information System for Architectural and Archaeological Records Data (Department of Archaeology & Historic Preservation [DAHP] Project No. 2018-07-05928). Please let us know if you need copies for your review.

Cardno found no sub-surface artifacts within the Corps' permit area. Cardno identified and recorded three interconnected graded and partially maintained gravel roads segments within the permit area as Site 45KI01481. The road segments are associated with a ca. 1935–1950s residential development that was demolished between 1954 and the early 1960s, prior to the Weyerhaeuser campus. Although the road segments are currently maintained and are used for access, Cardno found no evidence connecting the roads to the design of the Weyerhaeuser campus. The roads appear to be simple relics of the previous housing development, opportunistically used today. Cardno recommends 45KI01481 is not eligible for listing in the NRHP, and the Corps agrees.

DAHP determined the main Weyerhaeuser headquarters building to be eligible for listing in the National Register of Historic Places on October 31, 2017, but their determination did not include the surrounding campus landscape. Cardno recommends “that the historic designed landscape is eligible for the NRHP as a historic district at a national level of significance... Because of the proposed historic district’s exceptional historical and design significance, it is recommended eligible at a national level of significance under Criteria Consideration G for resources that have achieved significance within the past 50 years. Its recommended period of significance is 1969 – 1979.”

Cardno “recommends that the Woodbridge Building A and Woodbridge Building B projects, along with their associated detention pond, will have an adverse effect on the Weyerhaeuser Corporate Headquarters Historic District by diminishing the integrity of the recommended contributing 50-foot buffer east of Weyerhaeuser Road, a private road that forms part of the recommended contributing circulation road network. The buffer’s diminished integrity in turn diminishes the integrity of the driving views that reflect the image Weyerhaeuser Company wanted to project of itself as a forest-management company when it worked with the original designers on the corporate campus.”

Cardo further recommends that because “the area where the projects are proposed was earmarked for further expansion of the campus by the original design team, the recommendation of adverse effect does not apply to the recommended non-contributing stands of trees east of the buffer because it will not diminish the integrity of a recommended contributing element to the campus per 36 CFR § 800.5(a)(1).” However, consulting parties, including the Washington Trust for Historic Preservation (WTHP) and The Cultural Landscape Foundation (TCLF) recommend

the wooded area is also an important contributing elements to the district. This stand of trees is located in the permit area and would be unavoidably destroyed by the proposed construction.

The Corps finds the Weyerhaeuser Corporate Headquarters Historic District to be an exceptional district unambiguously eligible for listing in the National Register of Historic Places. TCLF believes “that the corporate campus would also qualify for the more esteemed designation of National Historic Landmark (NHL), of which there are currently fewer than 2,600, with approximately 80 of those properties designated for significance in the area of landscape architecture.” The Corps permit area does not include the entire campus and as such the Corps’ determination of identification (for components that comprise the district) and effect are limited to the Corps’ permit area. Within the Corps’ permit area, the Corps agrees that the project will have an adverse effect to the buffer and viewshed per Cardno’s recommendation, and by destruction of the wooded area—a contributing element per the WTHP’s and TCLF’s recommendations.

Based on the results presented above, the Corps has determined there would be an adverse effect to the Weyerhaeuser Corporate Headquarters Historic District by this undertaking and invites your comments. We will be reaching out to schedule meetings to consult on a resolution of adverse effects. If you have any questions or need additional information, please email me at [cultural.resources@usace.army.mil](mailto:cultural.resources@usace.army.mil) or call me at (206) 764-6909.

Sincerely,



Lance Lundquist  
Cultural Resources Program Manager  
Regulatory Branch