

Federal Way Link Extension

Draft Environmental Impact Statement

HISTORIC AND ARCHAEOLOGICAL TECHNICAL REPORT

Appendix G4



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Federal Way Link Extension

Historic and Archaeological Technical Report

Prepared for:
Sound Transit

Prepared by:
HDR Engineering, Inc. and
CH2M HILL

April 2015

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Appendix D

Agency and Tribal Consultation Letters

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U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

June 11, 2013

Dr. Allyson Brooks
State Historic Preservation officer
Washington Department of Archaeology and Historic Preservation
PO Box 48343
Olympia, WA 98504-8343

Subject: **Sound Transit Federal Way Transit Extension (FWTE)
Invitation to Participate in the Environmental Review Process, Scoping Notice, &
Initiation of Section 106 Consultation**

Dear Dr. Brooks:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Federal Way Transit Extension (FWTE) project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency under SEPA and FTA will be the lead agency under NEPA.

Notification of Undertaking

The project seeks to identify and evaluate alternatives to extend Link light rail from South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route (SR) 99 and Interstate 5 (I-5). The project corridor generally follows a topographic ridge between the Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The project was identified in the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. It is needed to provide a dependable and efficient connection along the corridor and respond to a growing number of transportation and community needs.

An Environmental Scoping Folio provides additional information, a map of possible alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary Purpose and Need Statement. This report, along with the Draft Coordination Plan, and other project information can be reviewed on the Sound Transit website at

<http://www.soundtransit.org/FWextension>.

Initiation of Section 106 Consultation

To ensure that we account for any effects of this undertaking on properties listed in or eligible for listing in the National Register of Historic Places, FTA confirms the initiation of Section 106 consultation pursuant to 36 CFR 800.2(a)(4).

Invitation to Participate in the Environmental Review Process

As part of the environmental review process for this project, the lead agencies must identify, as early as practicable, any other Federal and non-Federal agencies that may have an interest in the project, and invite such agencies to become participating agencies in the environmental review process¹. Your agency has been identified preliminarily as one that may have an interest in this project. Accordingly, you are being extended this invitation to become actively involved as a participating agency in the environmental review process for the project and to attend an agency scoping meeting.

As a participating agency, you will be asked to:

- Participate in the NEPA process starting at the earliest possible time, especially with regard to the development of the purpose and need statement, range of alternatives, EIS analysis methodologies, and the level of detail for the analysis of alternatives.
- Identify, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts.
- Provide meaningful and timely input on unresolved issues.
- Participate in the EIS scoping process.

The Washington Department of Archaeology and Historic Preservation (DAHP) does not have to accept this invitation. However, if DAHP elects not to become a participating agency, FTA and Sound Transit request that you decline this invitation in writing, indicating that your agency has no jurisdiction or authority with respect to the project, no expertise or information relevant to the project, and does not intend to submit comments on the project.

In order to give agencies adequate opportunity to weigh the relevance of their participation in this environmental review process, written responses to this invitation are not due until the close of the scoping process on July 15, 2013. **Please use the enclosed Participating Agency Designation form to accept or decline this invitation by July 15, 2013.**

Scoping

Sound Transit and FTA previously conducted "early scoping" for the alternatives analysis phase of the project from October 18 through November 19, 2012 (77 Federal Register 200 (16 October 2012) pp. 63413-63415). The February 2013 Early Scoping Summary Report describes the early scoping process and provides a summary of the comments which were received. The report can be accessed on Sound Transit's website at: <http://www.soundtransit.org/FWextension>.

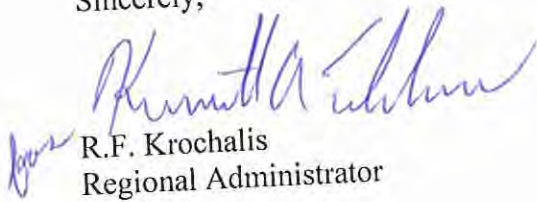
FTA and Sound Transit invite you to attend the scoping meeting for tribes and agencies on **June 25, 2013** at Sound Transit's Ruth Fisher Boardroom, Union Station, 401 South Jackson Street, Seattle, Washington 98104 from 1:00 to 3:00 pm. If you are unable to attend in person, you can

¹ Designation as a "participation agency" does not imply that the participating agency supports the proposed project or has any jurisdiction over, or special expertise concerning the proposed project or its potential impacts. A "participating agency" differs from a "cooperating agency," which is defined in regulations implementing the National Environmental Policy Act as "any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment." [40 C.F.R. § 1508.5](#).

watch a live, streaming broadcast of the meeting via Sound Transit's website at: <http://video.soundtransit.org/stream/>. If participating remotely, agency or tribal government staff may send questions during the meeting to FWTEscoping@soundtransit.org. Emailed questions will be read aloud and addressed during the meeting. The scoping period extends to July 15, 2013. Scoping comments are requested on the project's preliminary Purpose and Need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be included in the EIS.

If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, please contact Steve Saxton, FTA, at (206) 220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or kent.hale@soundtransit.org.

Sincerely,


R.F. Krochalis
Regional Administrator

cc: Matthew Sterner, DAHP
Cathal Ridge, Sound Transit
Kent Hale, Sound Transit

Enclosures: Participating Agency Designation Form

**FEDERAL WAY TRANSIT EXTENSION
PARTICIPATING AGENCY DESIGNATION**

- ☐ Yes, the Washington Department of Archaeology and Historic Preservation wishes to be designated as a participating agency for the proposed Federal Way Transit Extension project.
- ☐ No, the Washington Department of Archaeology and Historic Preservation does not wish to be designated as a participating agency for the proposed Federal Way Transit Extension project because:
- ☐ Agency has no jurisdiction or authority with respect to the project
- ☐ Agency has no expertise or information relevant to the project
- ☐ Agency does not intend to submit comments on the project

_____ (Sign – Authorized Representative)

_____ (Print)

_____ (Title)

_____ (Date)

Please return by **July 15, 2013** to:

Steve Saxton
Federal Transit Administration, Region 10
915 Second Ave., Room 3142
Seattle, WA 98174
Phone: (206) 220-4465
Fax: (206) 220-7537



U.S. Department
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206-220-7959 (fax)

June 11, 2013

Virginia Cross
Tribal Chair
Muckleshoot Indian Tribe
39015 172nd Ave SE
Auburn, WA 98092

**Subject: Sound Transit Federal Way Transit Extension (FWTE)
Invitation to Participate in the Environmental Review Process, Scoping Notice, &
Initiation of Section 106 Consultation**

The Honorable Virginia Cross:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Federal Way Transit Extension (FWTE) project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency under SEPA and FTA will be the lead agency under NEPA.

The project seeks to identify and evaluate alternatives to extend Link light rail from South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route (SR) 99 and Interstate 5 (I-5). The project corridor generally follows a topographic ridge between the Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The project was identified in the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. It is needed to provide a dependable and efficient connection along the corridor and respond to a growing number of transportation and community needs.

An Environmental Scoping Report provides additional information, a map of possible alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary Purpose and Need Statement. This report, along with the Draft Coordination Plan, and other project information can be reviewed on the Sound Transit website at <http://www.soundtransit.org/FWextension>.

Initiation of Section 106 Consultation

We are initiating consultation under Section 106 of the National Historic Preservation Act of 1966 and its associated regulations to help identify places that may have traditional religious and cultural importance to your tribal organization. Please note that we are requesting information only on such places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We are also interested in potentially affected places of historical significance to your tribe.

Invitation to Participate in the Environmental Review Process

As part of the environmental review process for this project, the lead agencies must identify, as early as practicable, any other Federal and non-Federal agencies that may have an interest in the project, and invite such agencies to become participating agencies in the environmental review process¹. The Muckleshoot Indian Tribe may have a potential interest due to the possibility of cultural resources and fisheries in the project area. Accordingly, FTA invites the tribe to become a participating agency.

As a participating agency, you will be asked to:

- Participate in the NEPA process starting at the earliest possible time, especially with regard to the development of the purpose and need statement, range of alternatives, EIS analysis methodologies, and the level of detail for the analysis of alternatives.
- Identify, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts.
- Provide meaningful and timely input on unresolved issues.
- Participate in the EIS scoping process.

In order to give agencies adequate opportunity to weigh the relevance of their participation in this environmental review process, written responses to this invitation are not due until the close of the scoping process on July 15, 2013. Please use the enclosed Participating Agency Designation form to accept or decline this invitation by July 15, 2013.

Scoping

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FTA and Sound Transit invite you to attend the scoping meeting for tribes and agencies on **June 25, 2013** at Sound Transit's Ruth Fisher Boardroom, Union Station, 401 South Jackson Street, Seattle, Washington 94014 from 1:00 to 3:00 pm. If you are unable to attend in person, you can watch a live, streaming broadcast of the meeting via Sound Transit's website at: <http://video.soundtransit.org/stream/>. If participating remotely, agency or tribal government staff may send questions during the meeting to FWTEscoping@soundtransit.org. Emailed questions will be read aloud and addressed during the meeting. The scoping period extends to July 15, 2013.

¹ Designation as a "participation agency" does not imply that the participating agency supports the proposed project or has any jurisdiction over, or special expertise concerning the proposed project or its potential impacts. A "participating agency" differs from a "cooperating agency," which is defined in regulations implementing the National Environmental Policy Act as "any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment." 40 C.F.R. § 1508.5.

Scoping comments are requested on the project's preliminary Purpose and Need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be included in the EIS.

If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, please contact Steve Saxton, FTA, at (206) 220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or kent.hale@soundtransit.org.

Sincerely,



for R.F. Krochalis
Regional Administrator

Enclosures: Participating Agency Designation Form

cc: Laura Murphy, Muckleshoot Indian Tribe
Karen Walter, Muckleshoot Indian Tribe
Allyson Brooks, DAHP
Cathal Ridge, Sound Transit
Kent Hale, Sound Transit

**FEDERAL WAY TRANSIT EXTENSION
PARTICIPATING AGENCY DESIGNATION**

- ☐ Yes, the Muckleshoot Indian Tribe wishes to be designated as a participating agency for the proposed Federal Way Transit Extension project.
- ☐ No, the Muckleshoot Indian Tribe does not wish to be designated as a participating agency for the proposed Federal Way Transit Extension project.

_____ (Sign – Authorized Representative)

_____ (Print)

_____ (Title)

_____ (Date)

Please return by **July 15, 2013** to:

Steve Saxton
Federal Transit Administration, Region 10
915 Second Ave., Room 3142
Seattle, WA 98174
james.saxton@dot.gov

Phone: (206) 220-4311
Fax: (206) 220-7537



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June 11, 2013

Herman Dillon, Sr.
Tribal Chair
Puyallup Tribe of the Puyallup Reservation
3009 E Portland Ave
Tacoma, WA 98404

**Subject: Sound Transit Federal Way Transit Extension (FWTE)
Invitation to Participate in the Environmental Review Process, Scoping Notice, &
Initiation of Section 106 Consultation**

The Honorable Herman Dillon, Sr.:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Federal Way Transit Extension (FWTE) project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency under SEPA and FTA will be the lead agency under NEPA.

The project seeks to identify and evaluate alternatives to extend Link light rail from South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route (SR) 99 and Interstate 5 (I-5). The project corridor generally follows a topographic ridge between the Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The project was identified in the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. It is needed to provide a dependable and efficient connection along the corridor and respond to a growing number of transportation and community needs.

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Invitation to Participate in the Environmental Review Process

As part of the environmental review process for this project, the lead agencies must identify, as early as practicable, any other Federal and non-Federal agencies that may have an interest in the project, and invite such agencies to become participating agencies in the environmental review process¹. The Puyallup Tribe of the Puyallup Reservation may have a potential interest due to the possibility of cultural resources and fisheries in the project area. Accordingly, FTA invites the tribe to become a participating agency.

As a participating agency, you will be asked to:

- Participate in the NEPA process starting at the earliest possible time, especially with regard to the development of the purpose and need statement, range of alternatives, EIS analysis methodologies, and the level of detail for the analysis of alternatives.
- Identify, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts.
- Provide meaningful and timely input on unresolved issues.
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Sincerely,


R.F. Krochalis
Regional Administrator

Enclosures: Participating Agency Designation Form

cc: Brandon Reynon, Puyallup Tribe of the Puyallup Reservation
Bill Sullivan, Puyallup Tribe of the Puyallup Reservation
Allyson Brooks, DAHP
Cathal Ridge, Sound Transit
Kent Hale, Sound Transit

**FEDERAL WAY TRANSIT EXTENSION
PARTICIPATING AGENCY DESIGNATION**

- ☐ Yes, the Puyallup Tribe of the Puyallup Reservation wishes to be designated as a participating agency for the proposed Federal Way Transit Extension project.
- ☐ No, the Puyallup Tribe of the Puyallup Reservation does not wish to be designated as a participating agency for the proposed Federal Way Transit Extension project.

_____ (Sign – Authorized Representative)

_____ (Print)

_____ (Title)

_____ (Date)

Please return by **July 15, 2013** to:

Steve Saxton
Federal Transit Administration, Region 10
915 Second Ave., Room 3142
Seattle, WA 98174
james.saxton@dot.gov

Phone: (206) 220-4311
Fax: (206) 220-7537



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June 11, 2013

Carolyn Lubenau
Tribal Chair
Snoqualmie Indian Tribe
PO Box 969
Snoqualmie, WA 98065

**Subject: Sound Transit Federal Way Transit Extension (FWTE)
Invitation to Participate in the Environmental Review Process, Scoping Notice, &
Initiation of Section 106 Consultation**

The Honorable Carolyn Lubenau:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Federal Way Transit Extension (FWTE) project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency under SEPA and FTA will be the lead agency under NEPA.

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Invitation to Participate in the Environmental Review Process

As part of the environmental review process for this project, the lead agencies must identify, as early as practicable, any other Federal and non-Federal agencies that may have an interest in the project, and invite such agencies to become participating agencies in the environmental review process¹. The Snoqualmie Indian Tribe may have a potential interest due to the possibility of cultural resources and fisheries in the project area. Accordingly, FTA invites the tribe to become a participating agency.

As a participating agency, you will be asked to:

- Participate in the NEPA process starting at the earliest possible time, especially with regard to the development of the purpose and need statement, range of alternatives, EIS analysis methodologies, and the level of detail for the analysis of alternatives.
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If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, please contact Steve Saxton, FTA, at (206) 220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or kent.hale@soundtransit.org.

Sincerely,


R.F. Krochalis
Regional Administrator

Enclosures: Participating Agency Designation Form

cc: Steven Mullen Moses, Snoqualmie Indian Tribe
Cindy Spiry, Snoqualmie Indian Tribe
Allyson Brooks, DAHP
Cathal Ridge, Sound Transit
Kent Hale, Sound Transit

**FEDERAL WAY TRANSIT EXTENSION
PARTICIPATING AGENCY DESIGNATION**

- ☐ Yes, the Snoqualmie Indian Tribe wishes to be designated as a participating agency for the proposed Federal Way Transit Extension project.
- ☐ No, the Snoqualmie Indian Tribe does not wish to be designated as a participating agency for the proposed Federal Way Transit Extension project.

_____ (Sign – Authorized Representative)

_____ (Print)

_____ (Title)

_____ (Date)

Please return by **July 15, 2013** to:

Steve Saxton
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June 11, 2013

Shawn Yanity
Chairman
Stillaguamish Tribe of Indians of Washington
PO Box 277
Arlington, WA 98223

**Subject: Sound Transit Federal Way Transit Extension (FWTE)
Invitation to Participate in the Environmental Review Process, Scoping Notice, &
Initiation of Section 106 Consultation**

The Honorable Shawn Yanity:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Federal Way Transit Extension (FWTE) project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency under SEPA and FTA will be the lead agency under NEPA.

The project seeks to identify and evaluate alternatives to extend Link light rail from South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route (SR) 99 and Interstate 5 (I-5). The project corridor generally follows a topographic ridge between the Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The project was identified in the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. It is needed to provide a dependable and efficient connection along the corridor and respond to a growing number of transportation and community needs.

An Environmental Scoping Report provides additional information, a map of possible alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary Purpose and Need Statement. This report, along with the Draft Coordination Plan, and other project information can be reviewed on the Sound Transit website at <http://www.soundtransit.org/FWextension>.

Initiation of Section 106 Consultation

We are initiating consultation under Section 106 of the National Historic Preservation Act of 1966 and its associated regulations to help identify places that may have traditional religious and cultural importance to your tribal organization. Please note that we are requesting information only on such places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We are also interested in potentially affected places of historical significance to your tribe.

Invitation to Participate in the Environmental Review Process

As part of the environmental review process for this project, the lead agencies must identify, as early as practicable, any other Federal and non-Federal agencies that may have an interest in the project, and invite such agencies to become participating agencies in the environmental review process¹. The Stillaguamish Tribe of Indians of Washington may have a potential interest due to the possibility of cultural resources and fisheries in the project area. Accordingly, FTA invites the tribe to become a participating agency.

As a participating agency, you will be asked to:

- Participate in the NEPA process starting at the earliest possible time, especially with regard to the development of the purpose and need statement, range of alternatives, EIS analysis methodologies, and the level of detail for the analysis of alternatives.
- Identify, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts.
- Provide meaningful and timely input on unresolved issues.
- Participate in the EIS scoping process.

In order to give agencies adequate opportunity to weigh the relevance of their participation in this environmental review process, written responses to this invitation are not due until the close of the scoping process on July 15, 2013. Please use the enclosed Participating Agency Designation form to accept or decline this invitation by July 15, 2013.

Scoping

Sound Transit and FTA previously conducted "early scoping" for the alternatives analysis phase of the project from October 18 through November 19, 2012 (77 Federal Register 200 (16 October 2012) pp. 63413-63415). The February 2013 Early Scoping Summary Report describes the early scoping process and provides a summary of the comments which were received. The report can be accessed on Sound Transit's website at: <http://www.soundtransit.org/FWextension>.

FTA and Sound Transit invite you to attend the scoping meeting for tribes and agencies on **June 25, 2013** at Sound Transit's Ruth Fisher Boardroom, Union Station, 401 South Jackson Street, Seattle, Washington 94014 from 1:00 to 3:00 pm. If you are unable to attend in person, you can watch a live, streaming broadcast of the meeting via Sound Transit's website at: <http://video.soundtransit.org/stream/>. If participating remotely, agency or tribal government staff may send questions during the meeting to FWTEscoping@soundtransit.org. Emailed questions will be read aloud and addressed during the meeting. The scoping period extends to July 15, 2013.

¹ Designation as a "participation agency" does not imply that the participating agency supports the proposed project or has any jurisdiction over, or special expertise concerning the proposed project or its potential impacts. A "participating agency" differs from a "cooperating agency," which is defined in regulations implementing the National Environmental Policy Act as "any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment." 40 C.F.R. § 1508.5.

Scoping comments are requested on the project's preliminary Purpose and Need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be included in the EIS.

If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, please contact Steve Saxton, FTA, at (206) 220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or kent.hale@soundtransit.org.

Sincerely,



R.F. R.F. Krochalis
Regional Administrator

Enclosures: Participating Agency Designation Form

cc: Kerry Lyste, Stillaguamish Tribe of Indians of Washington
Pat Stevenson, Stillaguamish Tribe of Indians of Washington
Allyson Brooks, DAHP
Cathal Ridge, Sound Transit
Kent Hale, Sound Transit

**FEDERAL WAY TRANSIT EXTENSION
PARTICIPATING AGENCY DESIGNATION**

- ☐ Yes, the Stillaguamish Tribe of Indians of Washington wishes to be designated as a participating agency for the proposed Federal Way Transit Extension project.
- ☐ No, the Stillaguamish Tribe of Indians of Washington does not wish to be designated as a participating agency for the proposed Federal Way Transit Extension project.

_____ (Sign – Authorized Representative)

_____ (Print)

_____ (Title)

_____ (Date)

Please return by **July 15, 2013** to:

Steve Saxton
Federal Transit Administration, Region 10
915 Second Ave., Room 3142
Seattle, WA 98174
james.saxton@dot.gov

Phone: (206) 220-4311
Fax: (206) 220-7537



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

June 11, 2013

Leonard Forsman
Chair
Suquamish Tribe
PO Box 498
Suquamish, WA 98392

**Subject: Sound Transit Federal Way Transit Extension (FWTE)
Invitation to Participate in the Environmental Review Process, Scoping Notice, &
Initiation of Section 106 Consultation**

The Honorable Leonard Forsman:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Federal Way Transit Extension (FWTE) project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency under SEPA and FTA will be the lead agency under NEPA.

The project seeks to identify and evaluate alternatives to extend Link light rail from South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route (SR) 99 and Interstate 5 (I-5). The project corridor generally follows a topographic ridge between the Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The project was identified in the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. It is needed to provide a dependable and efficient connection along the corridor and respond to a growing number of transportation and community needs.

An Environmental Scoping Report provides additional information, a map of possible alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary Purpose and Need Statement. This report, along with the Draft Coordination Plan, and other project information can be reviewed on the Sound Transit website at <http://www.soundtransit.org/FWextension>.

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We are initiating consultation under Section 106 of the National Historic Preservation Act of 1966 and its associated regulations to help identify places that may have traditional religious and cultural importance to your tribal organization. Please note that we are requesting information only on such places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We are also interested in potentially affected places of historical significance to your tribe.

Invitation to Participate in the Environmental Review Process

As part of the environmental review process for this project, the lead agencies must identify, as early as practicable, any other Federal and non-Federal agencies that may have an interest in the project, and invite such agencies to become participating agencies in the environmental review process¹. The Suquamish Tribe may have a potential interest due to the possibility of cultural resources and fisheries in the project area. Accordingly, FTA invites the tribe to become a participating agency.

As a participating agency, you will be asked to:

- Participate in the NEPA process starting at the earliest possible time, especially with regard to the development of the purpose and need statement, range of alternatives, EIS analysis methodologies, and the level of detail for the analysis of alternatives.
- Identify, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts.
- Provide meaningful and timely input on unresolved issues.
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If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, please contact Steve Saxton, FTA, at (206) 220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or kent.hale@soundtransit.org.

Sincerely,


R.F. Krochalis
Regional Administrator

Enclosures: Participating Agency Designation Form

cc: Dennis Lewarch, Suquamish Tribe
Allison O'Sullivan, Suquamish Tribe
Allyson Brooks, DAHP
Cathal Ridge, Sound Transit
Kent Hale, Sound Transit

**FEDERAL WAY TRANSIT EXTENSION
PARTICIPATING AGENCY DESIGNATION**

- ☐ Yes, the Suquamish Tribe wishes to be designated as a participating agency for the proposed Federal Way Transit Extension project.
- ☐ No, the Suquamish Tribe does not wish to be designated as a participating agency for the proposed Federal Way Transit Extension project.

_____ (Sign – Authorized Representative)

_____ (Print)

_____ (Title)

_____ (Date)

Please return by **July 15, 2013** to:

Steve Saxton
Federal Transit Administration, Region 10
915 Second Ave., Room 3142
Seattle, WA 98174
james.saxton@dot.gov

Phone: (206) 220-4311
Fax: (206) 220-7537



U.S. Department
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REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

June 11, 2013

Harry Smiskin
Tribal Chair
Confederated Tribes and Bands of the Yakama Nation
PO Box 151
Toppenish, WA 98948

**Subject: Sound Transit Federal Way Transit Extension (FWTE)
Invitation to Participate in the Environmental Review Process, Scoping Notice, &
Initiation of Section 106 Consultation**

The Honorable Harry Smiskin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Federal Way Transit Extension (FWTE) project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency under SEPA and FTA will be the lead agency under NEPA.

The project seeks to identify and evaluate alternatives to extend Link light rail from South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route (SR) 99 and Interstate 5 (I-5). The project corridor generally follows a topographic ridge between the Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The project was identified in the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. It is needed to provide a dependable and efficient connection along the corridor and respond to a growing number of transportation and community needs.

An Environmental Scoping Report provides additional information, a map of possible alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary Purpose and Need Statement. This report, along with the Draft Coordination Plan, and other project information can be reviewed on the Sound Transit website at <http://www.soundtransit.org/FWextension>.

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As a participating agency, you will be asked to:

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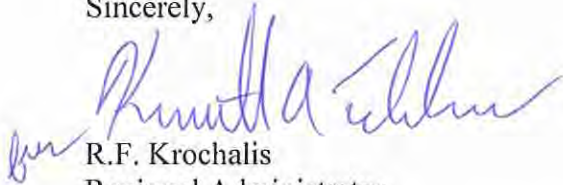
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Scoping comments are requested on the project's preliminary Purpose and Need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be included in the EIS.

If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, please contact Steve Saxton, FTA, at (206) 220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or kent.hale@soundtransit.org.

Sincerely,


R.F. Krochalis
Regional Administrator

Enclosures: Participating Agency Designation Form

cc: Johnson Meninick, Confederated Tribes and Bands of the Yakama Nation
Phillip Rigdon, Confederated Tribes and Bands of the Yakama Nation
Allyson Brooks, DAHP
Cathal Ridge, Sound Transit
Kent Hale, Sound Transit

**FEDERAL WAY TRANSIT EXTENSION
PARTICIPATING AGENCY DESIGNATION**

☐ Yes, the Confederated Tribes and Bands of the Yakama Nation wishes to be designated as a participating agency for the proposed Federal Way Transit Extension project.

☐ No, the Confederated Tribes and Bands of the Yakama Nation does not wish to be designated as a participating agency for the proposed Federal Way Transit Extension project.

_____ (Sign – Authorized Representative)

_____ (Print)

_____ (Title)

_____ (Date)

Please return by **July 15, 2013** to:

Steve Saxton
Federal Transit Administration, Region 10
915 Second Ave., Room 3142
Seattle, WA 98174
james.saxton@dot.gov

Phone: (206) 220-4311
Fax: (206) 220-7537



June 12, 2013

Michael Evans, Chair
Snohomish Tribe
11014 19th Ave SE Ste #8, PMP #101
Everett, WA 98208

Subject: **Sound Transit Federal Way Transit Extension (FWTE)
Invitation to Participate in the Environmental Review Process,
Scoping Notice, & Initiation of Section 106 Consultation**

The Honorable Michael Evans:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Federal Way Transit Extension (FWTE) project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). FTA will be the lead agency under NEPA and Sound Transit will be the lead agency for SEPA.

The FWTE project seeks to identify and evaluate alternatives to extend Link light rail from South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route (SR) 99 and Interstate 5 (I-5). The project corridor generally follows a topographic ridge between the Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The project was identified in the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. It is needed to provide a dependable and efficient connection along the corridor and respond to a growing number of transportation and community needs.

An Environmental Scoping Folio provides additional information, a map of possible alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary Purpose and Need Statement. This report, along with the Draft Coordination Plan, and other project information can be reviewed on the Sound Transit website at <http://www.soundtransit.org/FWextension>. Sound Transit will provide hardcopies of these documents upon request.

Initiation of Section 106 Consultation

We are initiating this consultation under Section 106 of the National Historic Preservation Act of 1966 and its associated regulations to help use identify places that may have traditional religious and cultural importance to your tribal organization. Please note that we are requesting information only on such places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We are also interested in potentially affected places of historical significance to your tribe.

CHAIR

Pat McCarthy
Pierce County Executive

VICE CHAIRS

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King County Councilmember

Aaron Reardon
Snohomish County Executive

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Seattle Mayor

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Lakewood Councilmember

Lynn Peterson
Washington State Secretary of Transportation

Larry Phillips
King County Councilmember

Paul Roberts
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Marilyn Strickland
Tacoma Mayor

Peter von Reichbauer
King County Councilmember

CHIEF EXECUTIVE OFFICER

Joni Earl

Scoping

Sound Transit and FTA previously conducted "early scoping" for the alternatives analysis phase of the project from October 18 through November 19, 2012 (77 Federal Register 200 (16 October 2012) pp. 63413-63415). The February 2013 Early Scoping Summary Report describes the early scoping process and provides a summary of the comments which were received. The report can be accessed on Sound Transit's website at:

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If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, call me at (206) 398-5103 or kent.hale@soundtransit.org.

Sincerely,



Kent Hale
Senior Environmental Planner

cc: Steve Saxton, FTA Region 10
Cathal Ridge, Sound Transit

Enclosure: SEPA DS

**Sound Transit
Federal Way Transit Extension
Determination of Significance
And Request for Comments on Scope of EIS**



Description of Proposal

The Central Puget Sound Regional Transit Authority (Sound Transit) is issuing this notice to advise other agencies, tribes, and the public that an Environmental Impact Statement (EIS) will be prepared to evaluate the Federal Way Transit Extension project. Sound Transit is the lead agency under the State Environmental Policy Act (SEPA) and the Federal Transit Administration (FTA) is the lead federal agency under the National Environmental Policy Act (NEPA). Together, the agencies will prepare a combined NEPA/SEPA EIS.

The proposed project would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The project is part of the ST2 Plan of transit investments approved by the voters in 2008. Currently, there is projected funding to construct to Kent/Des Moines in the vicinity of Highline Community College.

The purpose of the Federal Way Transit Extension is to expand the Sound Transit Link light rail system from SeaTac to the cities of Des Moines, Kent, and Federal Way in King County in order to meet the following objectives:

- Provide a rapid, reliable, accessible, and efficient alternative for travel to and from the corridor and other urban growth and activity centers in the region with sufficient capacity to meet projected demand.
- Expand mobility alternatives to traveling on congested roadways and improve connections to the regional multimodal transportation system with peak and off-peak service.
- Provide the high-capacity transit (HCT) infrastructure to support adopted regional and local land use, transportation, and economic development plans.
- Advance the long-range vision, goals, and objectives for transit service established by the Sound Transit Long-Range Plan for high-quality regional transit service connecting major activity centers in King, Pierce, and Snohomish counties.
- Implement a financially feasible system that seeks to preserve and promote a healthy environment.

The following conditions within the project corridor demonstrate the need for the project:

- North-south transit demand is expected to grow by 30 to 40 percent by 2035 as a result of residential and employment growth in the FWTE corridor and regionally.
- The FWTE corridor population is a highly transit-dependent population with needs for efficient, reliable regional connectivity.
- Congestion on I-5 and on the key corridor arterials leading in and out of the study area will increase and further degrade existing transit performance and reliability.
- There is a lack of reliable and efficient peak and off-peak transit service connecting persons in the FWTE corridor with the region's growth centers.

- Regional and local plans call for HCT in the corridor consistent with PSRC's VISION 2040 and the Regional Transit Long-Range Plan.
- Implementing the project will help meet environmental and sustainability goals of the state and region, including reduced vehicle miles traveled and reduced greenhouse gas emissions.

Potential Alternatives

Sound Transit and FTA are considering multiple alternatives for study in the EIS including a No-Build alternative and several light rail alternatives. Light rail alternatives would operate between the cities of SeaTac and Federal Way. Preliminary light rail alternatives were developed through an alternatives analysis process, the early scoping process (October 18 through November 19, 2012), and previous regional and local planning studies. Each light rail alternative includes three general station locations: the vicinity of South 240th Street (near Highline Community College), the vicinity of South 272nd Street (near the Redondo and Star Lake park-and-ride facilities), and the vicinity of South 317th Street (near the Federal Way Transit Center). The alternatives may include other additional station locations identified through the early scoping and alternatives analysis processes, but these additional stations are not funded under ST2. FTA and Sound Transit invite comments on these preliminary alternatives. Public and agency input received during the scoping period will help FTA and Sound Transit develop a range of reasonable alternatives to evaluate in the Draft EIS.

No Build Alternative. NEPA and SEPA require consideration of a No-Build or No Action Alternative. It reflects the existing transportation system plus the transportation improvements included in PSRC's Transportation Improvement Program.

Potential I-5 Alternatives. The potential I-5 Alternatives consist of light rail guideway along I-5 in two configurations. In one configuration, the guideway would run along the south side of the proposed SR 509 right-of-way to I-5 and then along the west side of the I-5 right-of-way. The guideway would deviate west from the I-5 right-of-way near 317th Street to access the Federal Way Transit Center area. For the other configuration, the alignment would transition from the west side of I-5 to the median of I-5 south of S. 240th Street, briefly transition back to the west side at 272nd Street, then continue in the median to 317th Street before transitioning back to the west side to access the Federal Way Transit Center area. Station locations proposed for evaluation with the I-5 Alternative include the vicinity of South 240th Street near Highline Community College; the vicinity of South 272nd Street near the Star Lake park-and-ride facility; and the vicinity of South 317th Street near the Federal Way Transit Center.

Potential SR 99 Alternatives. The potential SR 99 Alternatives would consist of light rail guideway along SR 99 in two configurations. In one configuration the guideway would follow the median for most of the length of SR 99. For the other configuration, the guideway could utilize and transition between the east side, west side, and/or median of SR 99. Station locations proposed for evaluation with the SR 99 Alternatives include the areas near the vicinity of South 240th Street near Highline Community College; the vicinity of South 272nd Street near the Redondo park-and-ride facility; and the vicinity of South 317th Street near the Federal Way Transit Center. The SR 99 alternatives may include other additional station locations in the vicinities of South 216th Street and South 260th Street identified through the early scoping and alternatives analysis processes.

Potential 30th Avenue Alternative. The potential 30th Avenue Alternative would consist of light rail guideway along a portion of 30th Avenue South in the cities of Des Moines and Kent. From Angle Lake Station, the guideway would travel along SR 99 and transition east to 30th Avenue at

approximately South 220th Street. The guideway would remain on 30th Avenue South from South 224th Street to approximately South 240th Street. From South 240th Street, the guideway would transition to SR-99 or I-5 and continue towards Federal Way. The station locations would be the same as those described in the previous alternatives.

Proponent: Sound Transit

Location of proposal: The proposed project is located in the cities of SeaTac, Kent, Des Moines, and Federal Way in King County.

Lead agency: Sound Transit is the lead agency for SEPA review (FTA is the lead agency for NEPA review)

EIS Required. The lead agency has determined this proposal is likely to have a significant adverse impact on the environment. An environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c) and will be prepared.

The lead agency has identified the following areas for discussion in the EIS: transportation, land use, economic activity and development potential, land acquisition and displacements, community facilities and neighborhoods, park and recreation resources, historic and cultural resources, visual and aesthetic qualities, air quality (including greenhouse gas emissions), noise and vibration, energy use, hazardous materials, construction impacts, public utilities and services, water resources, geology and soils, cumulative effects, and ecosystems, including threatened and endangered species. The following areas will also be included for the purposes of meeting NEPA requirements in this combined SEPA/NEPA EIS: Section 4(f)/6(f) resources (public parks, recreation areas, wildlife and waterfowl refuges, and historic sites of national, State, or local significance), Section 106 resources (historic and cultural properties on or eligible for listing in the National Register of Historic Places), and environmental justice (effects on low-income and minority populations). The scoping process may result in a more narrow scope of elements analyzed in the EIS.

Scoping. Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on the proposed range of alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. Two public scoping meetings and one agency scoping meeting are scheduled. The method and deadline for providing comments is as follows:

Comment Deadline: July 15, 2013

Comment Online: <http://www.soundtransit.org/FWextension>

Mail: Federal Way Transit Extension (c/o Kent Hale, Senior Environmental Planner)
Sound Transit
401 S Jackson St., Seattle, WA 98104

Email: FWTE@soundtransit.org

At a public meeting:

1. June 19, 2013, 3:00 pm to 6:00 pm

Federal Way Transit Center
31621 23rd Ave S.
Federal Way, WA 98003

2. June 26, 2016, 5:00 pm to 7:00 pm
Parkside Elementary
2104 S. 247th Street
Des Moines, WA 98198

3. Agency and Tribal Meeting
June 25, 2013, 1:00 pm to 3:00 pm
Sound Transit, Union Station, Ruth Fisher Boardroom
401 South Jackson Street
Seattle, WA 98104

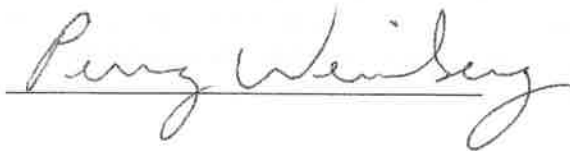
All public meeting locations are accessible to persons with disabilities who may also request materials be prepared and supplied in alternate formats by calling Tralayne Myers, (206) 398-5014 at least 48 hours in advance of the meeting. Persons who are deaf or hard of hearing may call (888) 713-6030 TTY.

Responsible Official: Perry Weinberg

Position/title: Director, Environmental Affairs and Sustainability Phone: 206-689-4931

Address: 401 S. Jackson Street, Seattle 98104

Additional environmental scoping information, including alternatives under consideration, topics for discussion in the EIS, and the project Purpose and Need Statement is available at <http://www.soundtransit.org/FWextension> or can be obtained by calling Tralayne Myers at 206-398-5014. For information on the scoping process, contact Kent Hale, Senior Environmental Planner, at 206-398-5103.

Date: 6/12/13 Signature: 

Perry Weinberg, Director
Office of Environmental Affairs and Sustainability
SEPA Responsible Official



June 12, 2013

Cecile A. Hansen
Tribal Chair
Duwamish Tribe
4705 W Marginal Way Southwest
Seattle WA, 98106

Subject: **Sound Transit Federal Way Transit Extension (FWTE)
Invitation to Participate in the Environmental Review Process,
Scoping Notice, & Initiation of Section 106 Consultation**

The Honorable Cecile Hansen:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Federal Way Transit Extension (FWTE) project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). FTA will be the lead agency under NEPA and Sound Transit will be the lead agency for SEPA.

The FWTE project seeks to identify and evaluate alternatives to extend Link light rail from South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route (SR) 99 and Interstate 5 (I-5). The project corridor generally follows a topographic ridge between the Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The project was identified in the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. It is needed to provide a dependable and efficient connection along the corridor and respond to a growing number of transportation and community needs.

An Environmental Scoping Folio provides additional information, a map of possible alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary Purpose and Need Statement. This report, along with the Draft Coordination Plan, and other project information can be reviewed on the Sound Transit website at <http://www.soundtransit.org/FWextension>. Sound Transit will provide hardcopies of these documents upon request.

Initiation of Section 106 Consultation

We are initiating this consultation under Section 106 of the National Historic Preservation Act of 1966 and its associated regulations to help use identify places that may have traditional religious and cultural importance to your tribal organization. Please note that we are requesting information only on such places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We are also interested in potentially affected places of historical significance to your tribe.

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Pierce County Executive

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King County Councilmember

Aaron Reardon
Snohomish County Executive

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King County Councilmember

CHIEF EXECUTIVE OFFICER

Joni Earl

Scoping

Sound Transit and FTA previously conducted "early scoping" for the alternatives analysis phase of the project from October 18 through November 19, 2012 (77 Federal Register 200 (16 October 2012) pp. 63413-63415). The February 2013 Early Scoping Summary Report describes the early scoping process and provides a summary of the comments which were received. The report can be accessed on Sound Transit's website at: <http://www.soundtransit.org/FWextension>.

FTA and Sound Transit invite you to attend the scoping meeting for tribes and agencies on **June 25, 2013** at Sound Transit's Ruth Fisher Boardroom, Union Station, 401 South Jackson Street, Seattle, Washington 98104 from 1:00 to 3:00 pm. If you are unable to attend in person, you can watch a live, streaming broadcast of the meeting via Sound Transit's website at: <http://video.soundtransit.org/stream/>. If participating remotely, agency or tribal government staff may send questions during the meeting to FWTEscoping@soundtransit.org. Emailed questions will be read aloud and addressed during the meeting. The scoping period extends to July 15, 2013. Scoping comments are requested on the project's preliminary Purpose and Need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be included in the EIS.

If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, call me at (206) 398-5103 or kent.hale@soundtransit.org.

Sincerely,



Kent Hale
Senior Environmental Planner

cc: Steve Saxton, FTA Region 10
Cathal Ridge, Sound Transit

Enclosure: SEPA DS

**Sound Transit
Federal Way Transit Extension
Determination of Significance
And Request for Comments on Scope of EIS**



Description of Proposal

The Central Puget Sound Regional Transit Authority (Sound Transit) is issuing this notice to advise other agencies, tribes, and the public that an Environmental Impact Statement (EIS) will be prepared to evaluate the Federal Way Transit Extension project. Sound Transit is the lead agency under the State Environmental Policy Act (SEPA) and the Federal Transit Administration (FTA) is the lead federal agency under the National Environmental Policy Act (NEPA). Together, the agencies will prepare a combined NEPA/SEPA EIS.

The proposed project would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The project is part of the ST2 Plan of transit investments approved by the voters in 2008. Currently, there is projected funding to construct to Kent/Des Moines in the vicinity of Highline Community College.

The purpose of the Federal Way Transit Extension is to expand the Sound Transit Link light rail system from SeaTac to the cities of Des Moines, Kent, and Federal Way in King County in order to meet the following objectives:

- Provide a rapid, reliable, accessible, and efficient alternative for travel to and from the corridor and other urban growth and activity centers in the region with sufficient capacity to meet projected demand.
- Expand mobility alternatives to traveling on congested roadways and improve connections to the regional multimodal transportation system with peak and off-peak service.
- Provide the high-capacity transit (HCT) infrastructure to support adopted regional and local land use, transportation, and economic development plans.
- Advance the long-range vision, goals, and objectives for transit service established by the Sound Transit Long-Range Plan for high-quality regional transit service connecting major activity centers in King, Pierce, and Snohomish counties.
- Implement a financially feasible system that seeks to preserve and promote a healthy environment.

The following conditions within the project corridor demonstrate the need for the project:

- North-south transit demand is expected to grow by 30 to 40 percent by 2035 as a result of residential and employment growth in the FWTE corridor and regionally.
- The FWTE corridor population is a highly transit-dependent population with needs for efficient, reliable regional connectivity.
- Congestion on I-5 and on the key corridor arterials leading in and out of the study area will increase and further degrade existing transit performance and reliability.
- There is a lack of reliable and efficient peak and off-peak transit service connecting persons in the FWTE corridor with the region's growth centers.

- Regional and local plans call for HCT in the corridor consistent with PSRC's VISION 2040 and the Regional Transit Long-Range Plan.
- Implementing the project will help meet environmental and sustainability goals of the state and region, including reduced vehicle miles traveled and reduced greenhouse gas emissions.

Potential Alternatives

Sound Transit and FTA are considering multiple alternatives for study in the EIS including a No-Build alternative and several light rail alternatives. Light rail alternatives would operate between the cities of SeaTac and Federal Way. Preliminary light rail alternatives were developed through an alternatives analysis process, the early scoping process (October 18 through November 19, 2012), and previous regional and local planning studies. Each light rail alternative includes three general station locations: the vicinity of South 240th Street (near Highline Community College), the vicinity of South 272nd Street (near the Redondo and Star Lake park-and-ride facilities), and the vicinity of South 317th Street (near the Federal Way Transit Center). The alternatives may include other additional station locations identified through the early scoping and alternatives analysis processes, but these additional stations are not funded under ST2. FTA and Sound Transit invite comments on these preliminary alternatives. Public and agency input received during the scoping period will help FTA and Sound Transit develop a range of reasonable alternatives to evaluate in the Draft EIS.

No Build Alternative. NEPA and SEPA require consideration of a No-Build or No Action Alternative. It reflects the existing transportation system plus the transportation improvements included in PSRC's Transportation Improvement Program.

Potential I-5 Alternatives. The potential I-5 Alternatives consist of light rail guideway along I-5 in two configurations. In one configuration, the guideway would run along the south side of the proposed SR 509 right-of-way to I-5 and then along the west side of the I-5 right-of-way. The guideway would deviate west from the I-5 right-of-way near 317th Street to access the Federal Way Transit Center area. For the other configuration, the alignment would transition from the west side of I-5 to the median of I-5 south of S. 240th Street, briefly transition back to the west side at 272nd Street, then continue in the median to 317th Street before transitioning back to the west side to access the Federal Way Transit Center area. Station locations proposed for evaluation with the I-5 Alternative include the vicinity of South 240th Street near Highline Community College; the vicinity of South 272nd Street near the Star Lake park-and-ride facility; and the vicinity of South 317th Street near the Federal Way Transit Center.

Potential SR 99 Alternatives. The potential SR 99 Alternatives would consist of light rail guideway along SR 99 in two configurations. In one configuration the guideway would follow the median for most of the length of SR 99. For the other configuration, the guideway could utilize and transition between the east side, west side, and/or median of SR 99. Station locations proposed for evaluation with the SR 99 Alternatives include the areas near the vicinity of South 240th Street near Highline Community College; the vicinity of South 272nd Street near the Redondo park-and-ride facility; and the vicinity of South 317th Street near the Federal Way Transit Center. The SR 99 alternatives may include other additional station locations in the vicinities of South 216th Street and South 260th Street identified through the early scoping and alternatives analysis processes.

Potential 30th Avenue Alternative. The potential 30th Avenue Alternative would consist of light rail guideway along a portion of 30th Avenue South in the cities of Des Moines and Kent. From Angle Lake Station, the guideway would travel along SR 99 and transition east to 30th Avenue at

approximately South 220th Street. The guideway would remain on 30th Avenue South from South 224th Street to approximately South 240th Street. From South 240th Street, the guideway would transition to SR-99 or I-5 and continue towards Federal Way. The station locations would be the same as those described in the previous alternatives.

Proponent: Sound Transit

Location of proposal: The proposed project is located in the cities of SeaTac, Kent, Des Moines, and Federal Way in King County.

Lead agency: Sound Transit is the lead agency for SEPA review (FTA is the lead agency for NEPA review)

EIS Required. The lead agency has determined this proposal is likely to have a significant adverse impact on the environment. An environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c) and will be prepared.

The lead agency has identified the following areas for discussion in the EIS: transportation, land use, economic activity and development potential, land acquisition and displacements, community facilities and neighborhoods, park and recreation resources, historic and cultural resources, visual and aesthetic qualities, air quality (including greenhouse gas emissions), noise and vibration, energy use, hazardous materials, construction impacts, public utilities and services, water resources, geology and soils, cumulative effects, and ecosystems, including threatened and endangered species. The following areas will also be included for the purposes of meeting NEPA requirements in this combined SEPA/NEPA EIS: Section 4(f)/6(f) resources (public parks, recreation areas, wildlife and waterfowl refuges, and historic sites of national, State, or local significance), Section 106 resources (historic and cultural properties on or eligible for listing in the National Register of Historic Places), and environmental justice (effects on low-income and minority populations). The scoping process may result in a more narrow scope of elements analyzed in the EIS.

Scoping. Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on the proposed range of alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. Two public scoping meetings and one agency scoping meeting are scheduled. The method and deadline for providing comments is as follows:

Comment Deadline: July 15, 2013

Comment Online: <http://www.soundtransit.org/FWextension>

Mail: Federal Way Transit Extension (c/o Kent Hale, Senior Environmental Planner)
Sound Transit
401 S Jackson St., Seattle, WA 98104

Email: FWTE@soundtransit.org

At a public meeting:

1. June 19, 2013, 3:00 pm to 6:00 pm

Federal Way Transit Center
31621 23rd Ave S.
Federal Way, WA 98003

2. June 26, 2016, 5:00 pm to 7:00 pm
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Sound Transit, Union Station, Ruth Fisher Boardroom
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Seattle, WA 98104

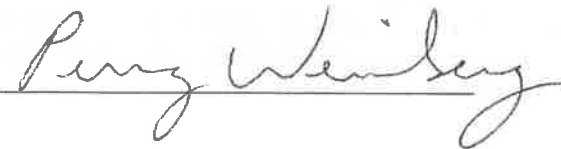
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Responsible Official: Perry Weinberg

Position/title: Director, Environmental Affairs and Sustainability Phone: 206-689-4931

Address: 401 S. Jackson Street, Seattle 98104

Additional environmental scoping information, including alternatives under consideration, topics for discussion in the EIS, and the project Purpose and Need Statement is available at <http://www.soundtransit.org/FWextension> or can be obtained by calling Tralayne Myers at 206-398-5014. For information on the scoping process, contact Kent Hale, Senior Environmental Planner, at 206-398-5103.

Date: 6/12/13 Signature: 

Perry Weinberg, Director
Office of Environmental Affairs and Sustainability
SEPA Responsible Official



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

November 27, 2013

Dr. Allyson Brooks
State Historic Preservation Officer
Department of Archaeology & Historic Preservation
PO Box 48343
Olympia, WA 98504-8343

RE: Sound Transit Federal Way Link Extension, Proposed Area of Potential Effect

Dear Dr. Brooks:

The Federal Transit Administration (FTA) and Sound Transit initiated consultation under 36 CFR 800.2(a)(4) for the Federal Way Link Extension (FWLE) in June 2013. We now request your comments and concurrence with the proposed area of potential effects (APE). Consistent with 36 CFR 800.16(d), the proposed APE represents the area within which the undertaking may "directly or indirectly cause alterations in the character or use of historic properties if such properties exist." Below is a summary of the project and the proposed APE.

1.1.1 Project Location

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
Township 21 N Range 4 E
Sections 4, 5, 8, 9 & 16
Township 22 N Range 4 E
Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33

1.1.2 Project Description

The FWLE Draft Environmental Impact Statement (EIS) will evaluate a set of light rail alignments and stations that would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The alternatives which will be evaluated in the Draft EIS are described below.

- SR 99 Alternative: The SR 99 Alternative generally follows the median of SR 99 but transitions to the east or west side at major intersections or to access station areas. This alternative includes design options to transition to 30th Avenue South and to transition to the east and west sides of SR 99 at various locations. The SR 99 Alternative includes stations in the vicinity of South 216th Street, South 240th Street, South 260th Street, South 272nd Street, and South 317th Street.

- I-5 Alternative: The I-5 Alternative follows the west side of I-5. It includes a design option to transition to the I-5 median in the area adjacent to the Midway Landfill. The I-5 Alternative includes stations in the vicinity of South 240th Street, South 272nd Street, and South 317th Street.
- SR 99/I-5 Alternative: The SR 99/I-5 Alternative is identical to the SR 99 Alternative from the north end of the project area to approximately Kent-Des Moines Road. Near Kent-Des Moines Road, the alignment transitions to the east and follows the I-5 Alternative alignment to the south end of the project area. The alternative includes design options along 30th Avenue South and within the I-5 median adjacent to the Midway Landfill.
- I-5/SR 99 Alternative: This alignment is identical to the I-5 Alternative from the north end of the project area to approximately Kent-Des Moines Road. Near Kent-Des Moines Road, the alignment transitions to the west and follows the SR 99 Alternative alignment to the south end of the project area. This alternative includes design options along the east and west sides of SR 99.

1.1.3 Definition of the APE

The APE extends 200 feet from each side of the center of the guideway alignments. It also includes a radius of approximately 200 feet from the outer limits of station locations and ancillary facilities. Specific locations and footprints for the Kent-Des Moines station in the vicinity of South 240th Street and the Federal Way Transit Center station in the vicinity of 317th Street have not been finalized. In these areas the APE includes all of the area between Kent-Des Moines Road, South 240th Street, SR 99, and I-5 and most of the area between South 312th Street and South 320th Street in Federal Way (see Figure 1, page 3 and Figure 2, page 5). Excluded from consideration is part of Steel Lake Park.

The APE also includes the areas where the project could directly disturb prehistoric and historic-period archaeological resources. Although the locations of project elements are not precisely known at this stage of the project, they are anticipated to be within the 200 foot buffer around the project elements described above. Details regarding the depth of construction will vary by alternative and will be developed as the project continues through project review and design.

Sound Transit will identify all potential direct and indirect effects to historic and archaeological resources listed or determined eligible for listing in the National Register of Historic Places (NRHP) within the APE boundaries. Sound Transit will accordingly inventory built environment resources constructed in or before 1970. A preliminary review of the Washington State Department of Archaeology and Historic Preservation records indicates that no historic era buildings and structures properties listed in the National Register of Historic Places and no archaeological properties are within the APE.

We look forward to your comments on the proposed APE. If you have any questions or need further information, please feel free to contact Steve Saxton, FTA, at 206-220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at 206-395-5103 or kent.hale@soundtransit.org.

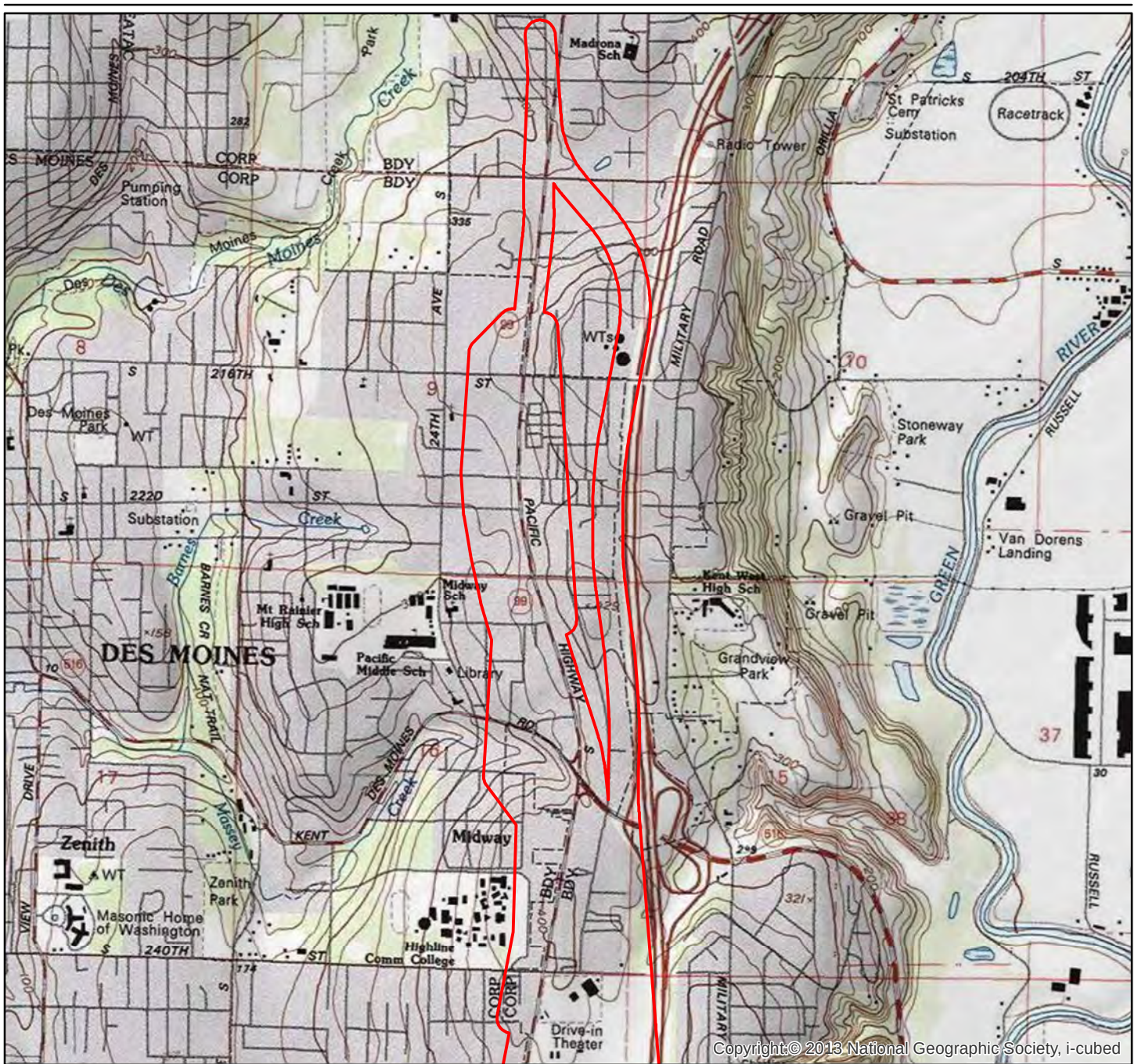
Sincerely,



Kenneth A. Feldman
Deputy Regional Administrator

cc: Matthew Sterner, DAHP
Kent Hale, Sound Transit

Enclosures: Figure 1-Area of Potential Effects - USGS Quad Maps (3)
Figure 2-Area of Potential Effects – Aerial Imagery (5)



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33

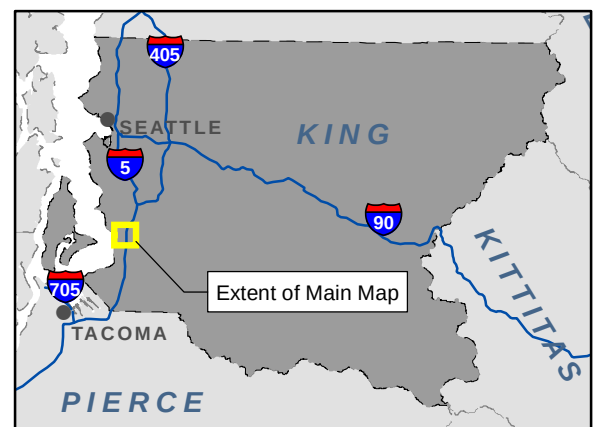
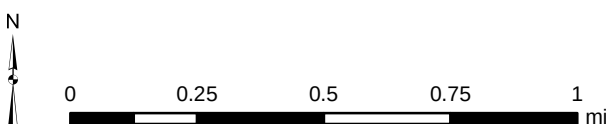
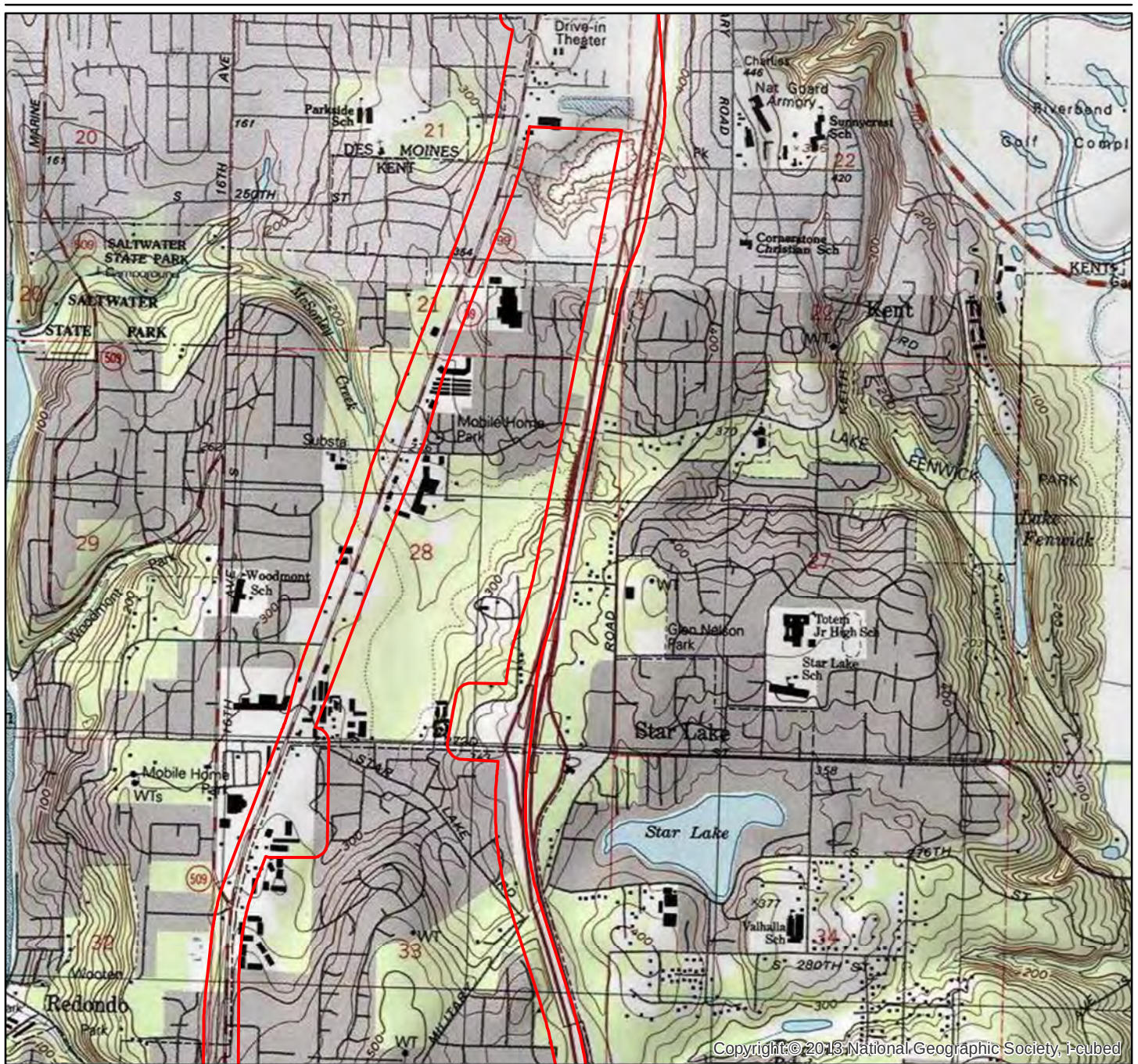


FIGURE 1
Area of Potential Effects (APE)
 Federal Way Link Extension Project
 King County, WA





Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33

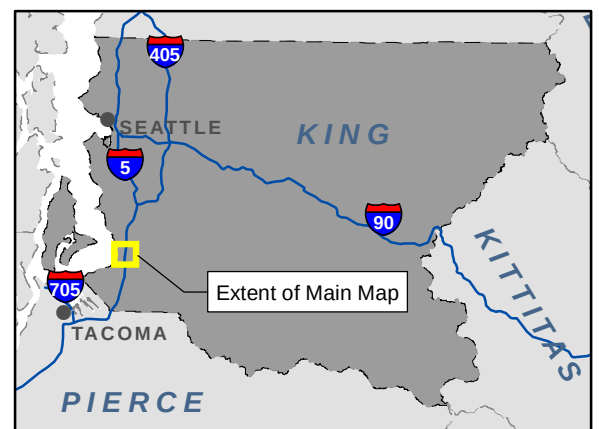
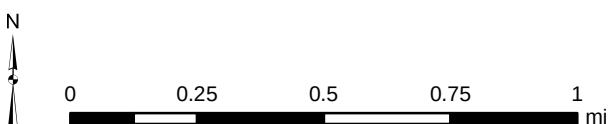
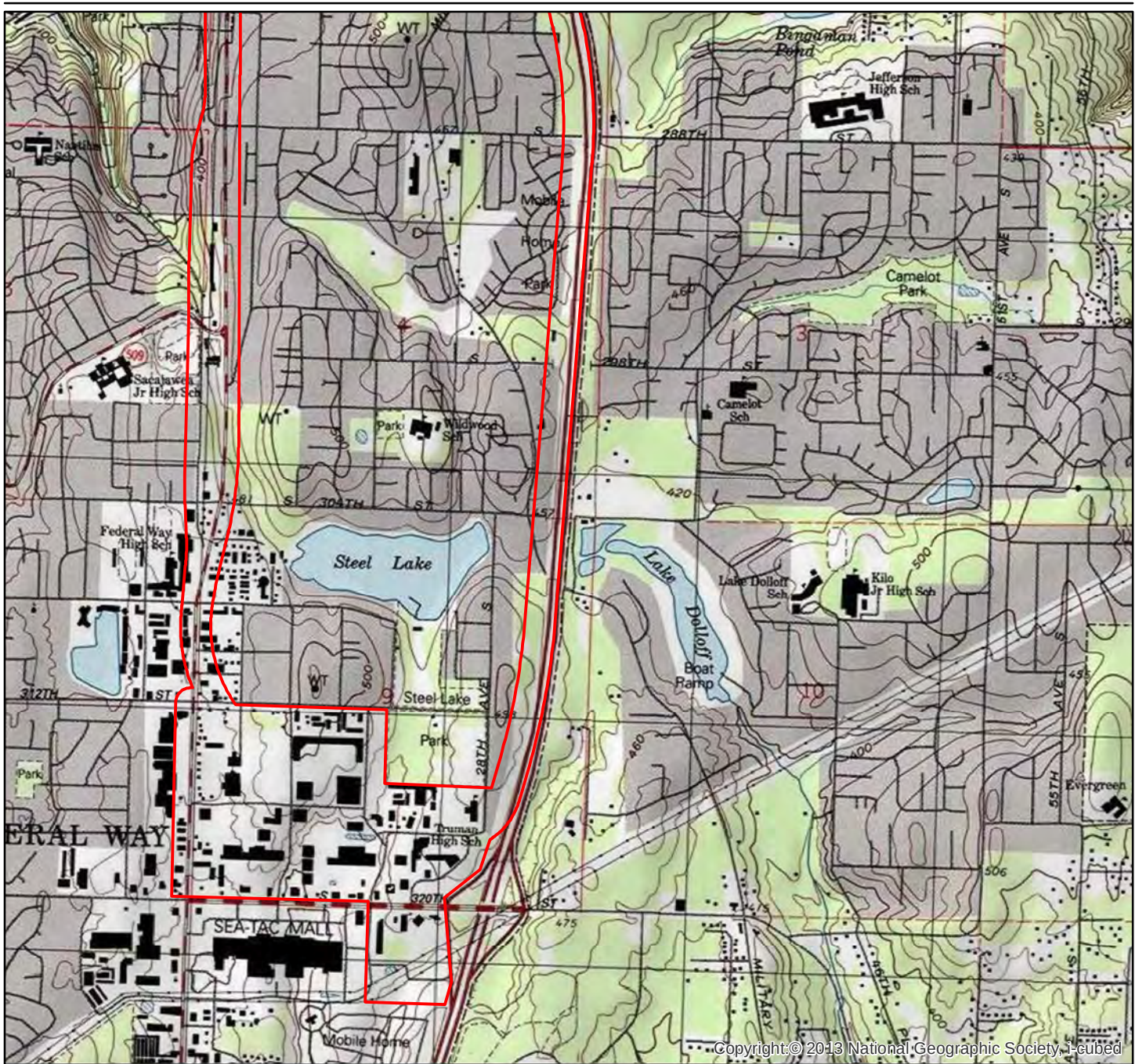


FIGURE 1
Area of Potential Effects (APE)
 Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33

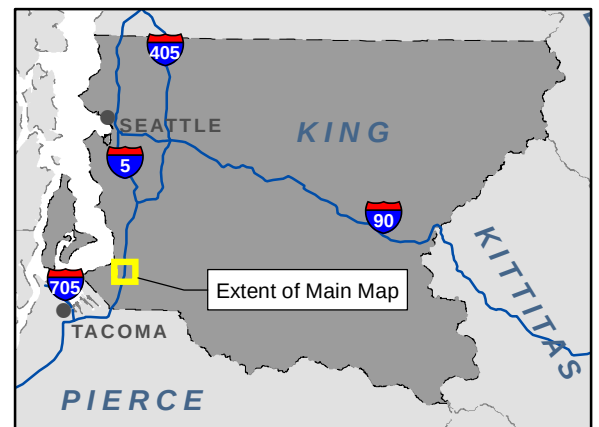
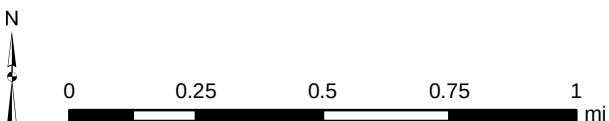
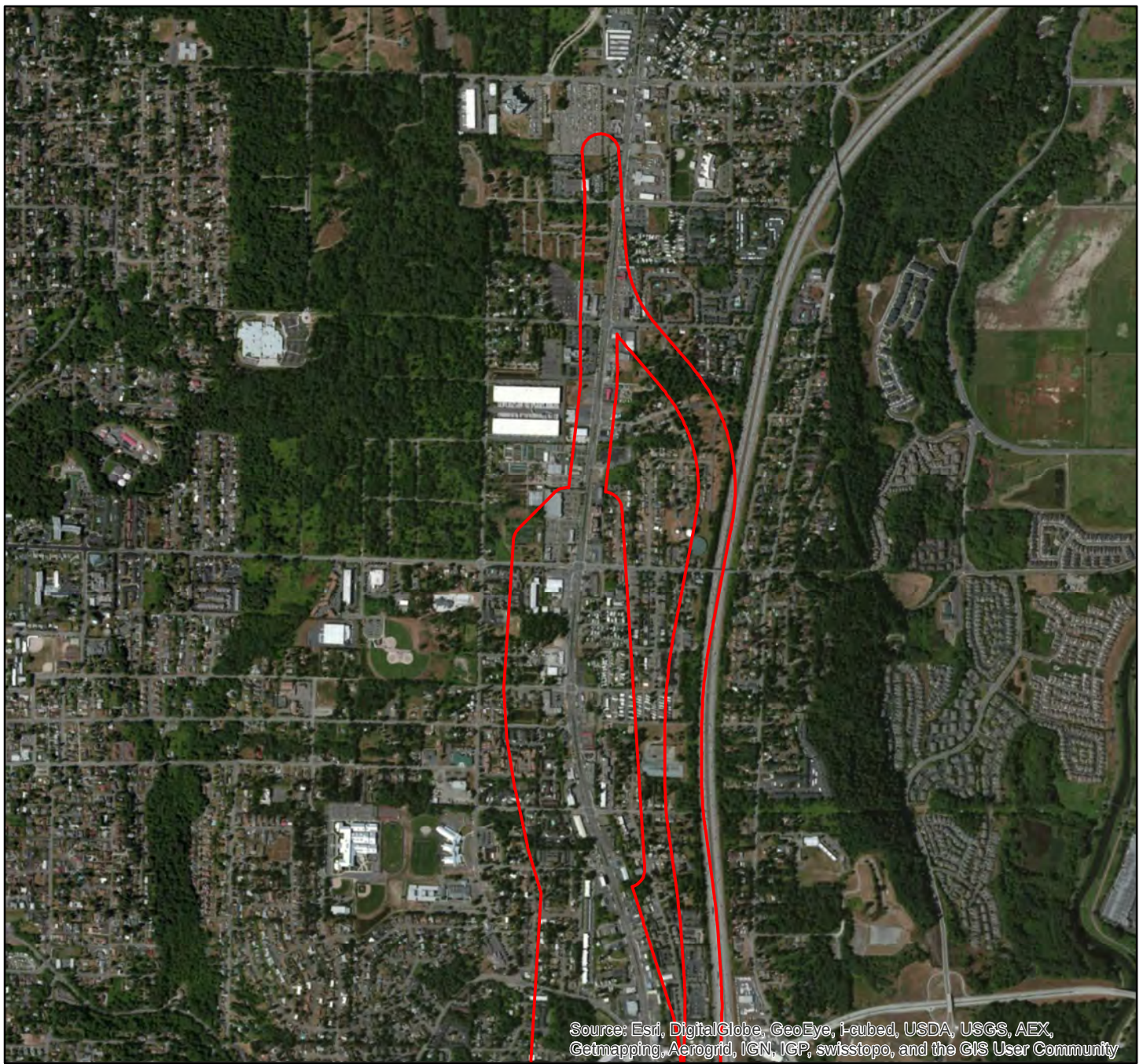


FIGURE 1
Area of Potential Effects (APE)
 Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

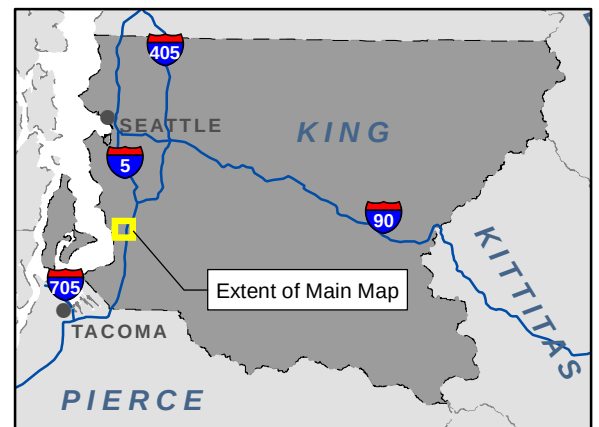
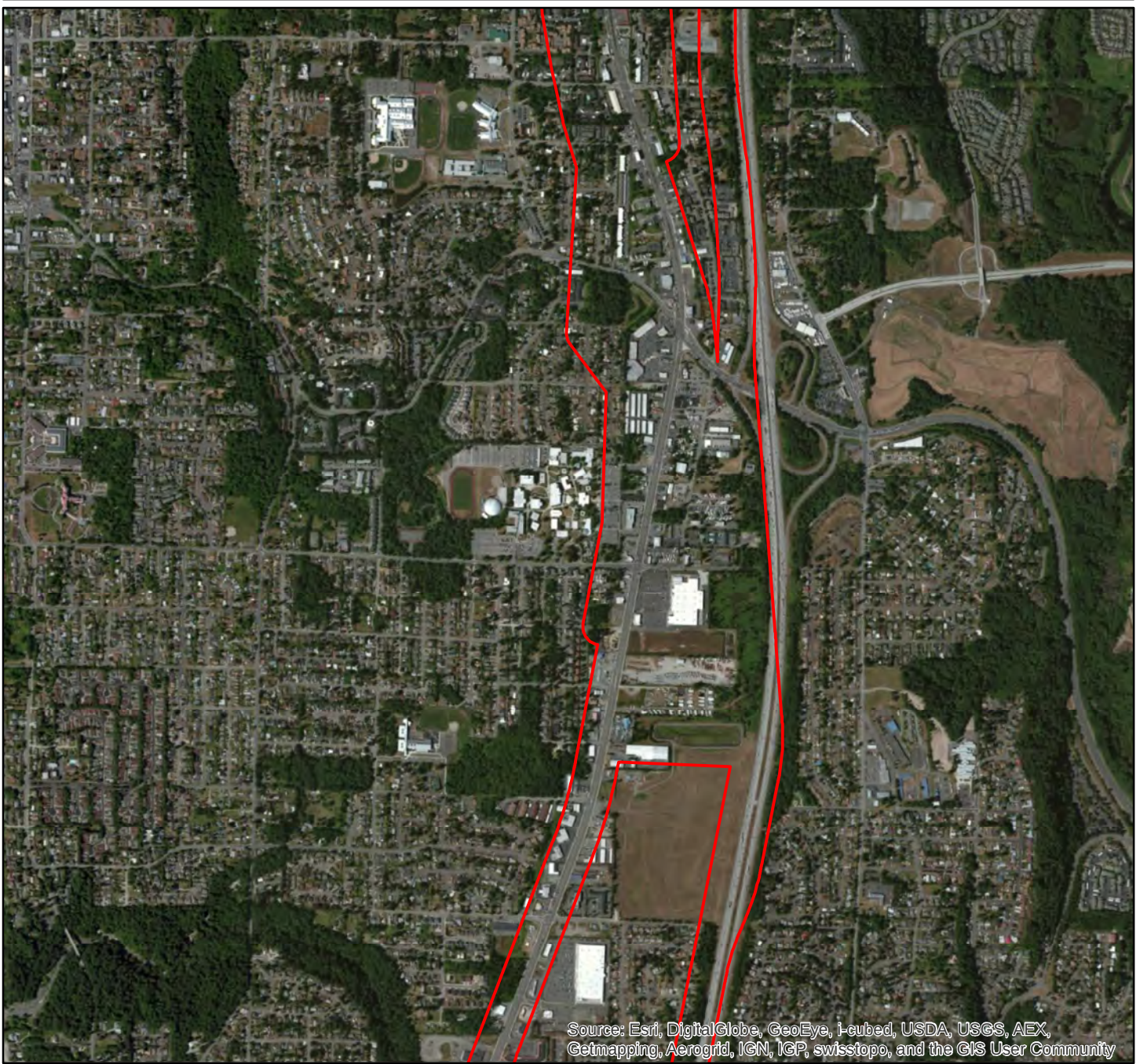


FIGURE 2
Detail of Area of Potential Effects (APE)
 Federal Way Link Extension Project
 King County, WA



0 500 1,000 2,000 3,000 4,000
 ft



Legend

Area of Potential Effects (APE)

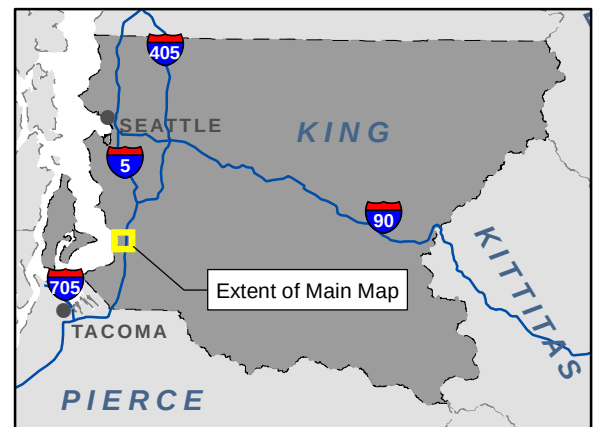


FIGURE 2
Detail of Area of Potential Effects (APE)
 Federal Way Link Extension Project
 King County, WA



0 500 1,000 2,000 3,000 4,000
 ft



Legend

Area of Potential Effects (APE)

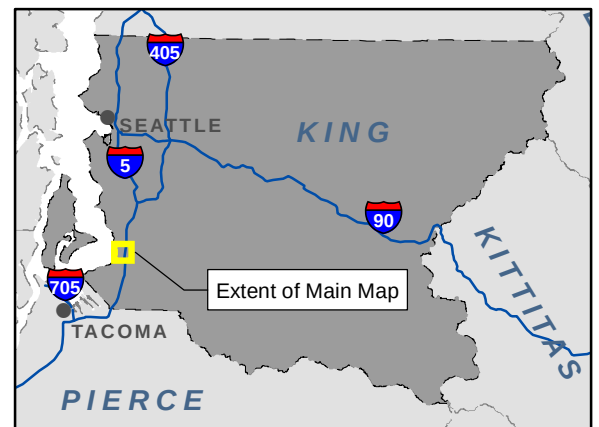
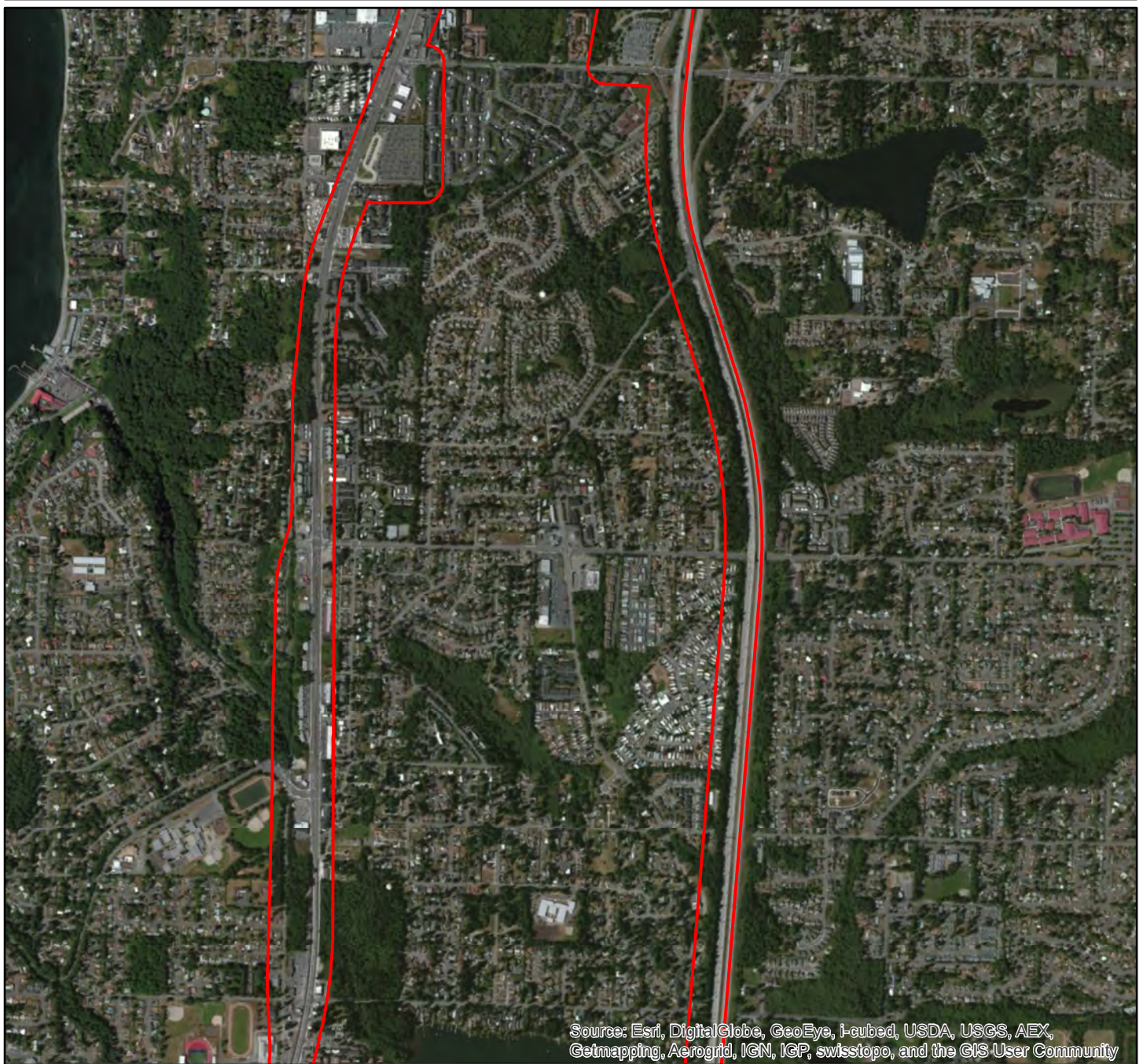


FIGURE 2
Detail of Area of Potential Effects (APE)
 Federal Way Link Extension Project
 King County, WA





Legend

Area of Potential Effects (APE)

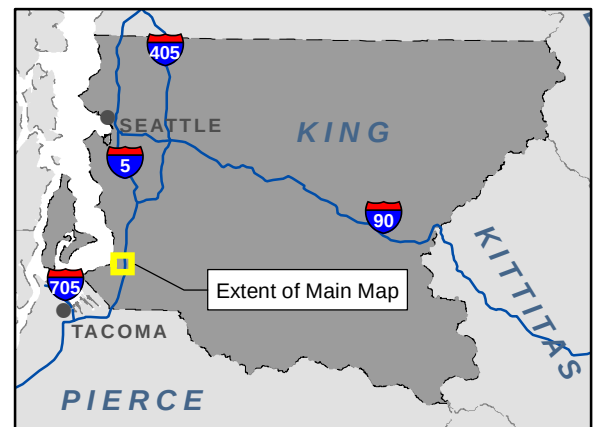


FIGURE 2
Detail of Area of Potential Effects (APE)
 Federal Way Link Extension Project
 King County, WA





Legend

Area of Potential Effects (APE)

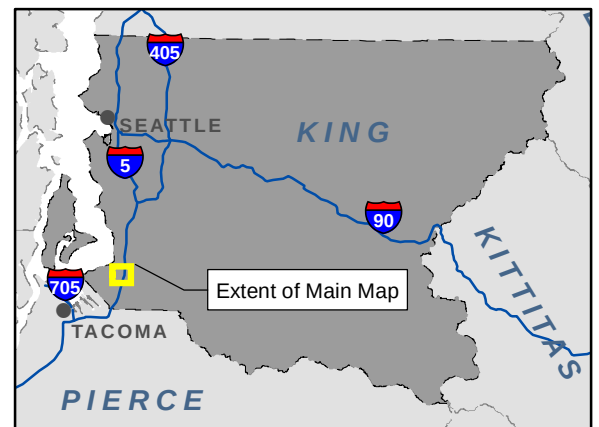


FIGURE 2
Detail of Area of Potential Effects (APE)
 Federal Way Link Extension Project
 King County, WA



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U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

February 20, 2014

Matthew Sterner
Transportation Archaeologist
Department of Archaeology and Historic Preservation
PO Box 48343
Olympia, WA 98504-8343

RE: Sound Transit Federal Way Link Extension, DAHP Log No.: 102912-18-FTA
Request for Concurrence with Eligibility and Non-Eligibility Determinations

Dear Mr. Sterner:

Thank you for your letter dated December 30, 2013 concurring with the area of potential effect (APE) for the Sound Transit Federal Way Link Extension, Department of Archaeology and Historic Preservation (DAHP) log number 102912-18-FTA. Since your letter, the Federal Transit Administration (FTA) and Sound Transit have prepared historic property inventory (HPI) forms for ten properties in the project APE. At this time, we seek your comments and concurrence on the proposed eligibility and non-eligibility determinations.

The APE for the Federal Way Link Extension includes over 300 properties that were constructed in or before 1970. FTA will be submitting HPI forms for the properties within the APE in two batches. This first batch includes HPI forms for ten properties within the APE. The second batch will include the remaining HPI forms for the project corridor.

Below is a brief summary of the ten properties that HPI forms are being submitted for at this time. Maps which identify the location of the properties and a table which identifies the properties and the proposed eligibility determination are enclosed. The HPI forms have been recorded in the Department of Archaeology and Historic Preservation's (DAHP's) database. **Please let us know if you would like hardcopies of the HPI forms.**

- *Highline Water District Water Tanks* - There are four water tanks located on the Highline Water District Water Tanks property. The largest elevated water tank constructed in 1962 was previously evaluated for eligibility in the National Register of Historic Places (NRHP) in 2012. DAHP determined that the elevated water tank is eligible under Criterion C as it retains sufficient integrity.

FTA and Sound Transit evaluated the four water tanks on the property and propose that the Highline Water District Water Tank property is not eligible for listing in the NRHP. While the water tanks retain integrity, they are typical elevated water towers and ground level

tanks that lack distinguishing features and do not embody distinctive characteristics of a type, period, or method of construction. Additionally, the tanks are not the work of a master and do not possess high artistic value. Therefore, the property is not eligible under NRHP Criterion C. The property is also not eligible under Criteria A, B, or D as it is not associated with events that have made a significant contribution to the broad patterns of history (Criterion A), is not directly associated with a person considered significant within a historic context whose specific contribution to history has been identified and documented (Criterion B), and the materials and construction methods do not convey important information that could contribute to understanding history or prehistory (Criterion D).

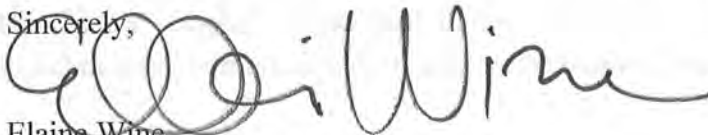
- *Highline Community College Buildings* - Highline Community College Buildings 12, 13, 14, 15, and 16 are located within the project APE and have not been previously evaluated for listing in the NRHP. FTA and Sound Transit propose that all four buildings are eligible for listing in the NRHP under Criterion C, for their architectural significance as examples of 1960's era tilt-up construction with exposed aggregate concrete exteriors.
- *Park of the Pines* – FTA and Sound Transit propose that the Park of the Pines Auditorium, Lot 7, and Lot 8 are not eligible for listing in the NRHP. The properties do not appear to be associated with important persons or events (Criteria A and B), are not architecturally distinctive and have been subject to extensive alternations (Criterion C), and the material and construction methods do not convey important information that could contribute to understanding history or prehistory (Criterion D).

FTA and Sound Transit also propose the Park of the Pines buildings do not comprise an eligible historic district. The buildings on Lot 7 and Lot 8 consist of a loose collection of residential accessory buildings that pre-date the formation of the conference center. The buildings are not united by any visible plan and do not appear to share significant historic context.

- *Calvary Lutheran Church* - FTA and Sound Transit propose that the Calvary Lutheran Church is eligible for listing in the NRHP under Criteria C for the 1967 sanctuary's architectural significance as an example of Neo-Expressionist architectural style.

FTA requests your concurrence with the proposed determinations of eligibility and non-eligibility. If you have any questions or would like additional information, please contact Steve Saxton at (206) 220-4311 or james.saxton@dot.gov. Thank you for your assistance.

Sincerely,



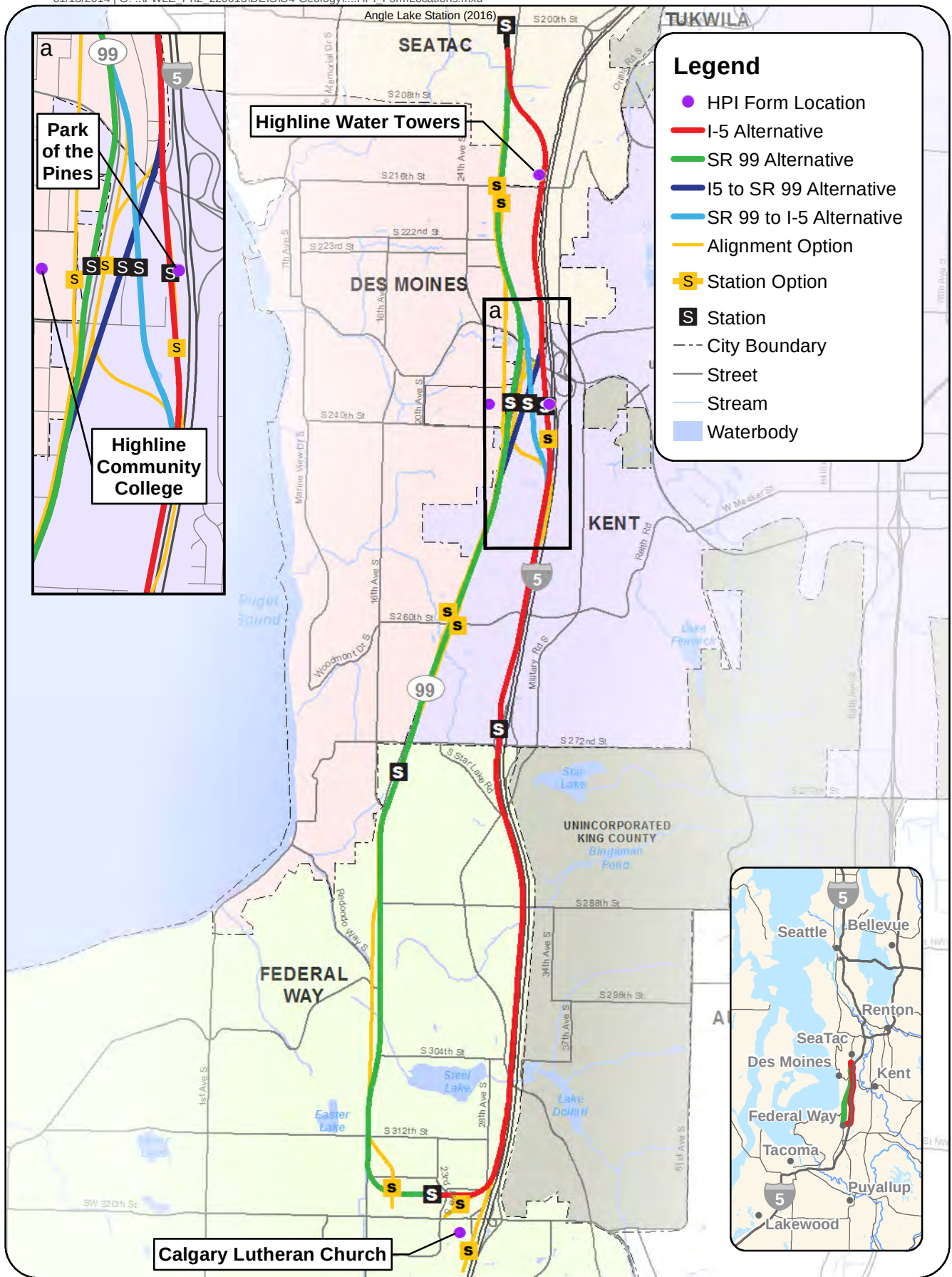
Elaine Wine
Director, Operations and Program Management

Enclosure:HPI Table
Maps (Exhibits 1 through 5)

Cc: (electronic) Kent Hale, Sound Transit

SOUND TRANSIT FEDERAL WAY LINK EXTENSION – GROUP 1 HPI FORMS

Historic Name	Common Name	Field Site #	Address	Proposed Eligibility Determination
King County Water District 75 water tanks	Highline Water District Water Tanks	n/a	21420 31st Ave S, SeaTac, WA 98198	Not Eligible
Highline Community College Biology Building	Highline Community College -- Building 12	1629-121	2400 S 240th St, Des Moines, WA 98198	Eligible
Highline Community College - Building 13	Highline Community College - Building 13	1629-121	2400 S 240th St, Des Moines, WA 98198	Eligible
Highline Community College - Building 14	Highline Community College - Building 14	1629-121	2400 S 240th St, Des Moines, WA 98198	Eligible
Highline Community College Faculty Offices	Highline Community College -- Building 15	1629-121	2400 S 240th St, Des Moines, WA 98198	Eligible
Highline Community College - Vocational and Technical buildings	Highline Community College - Building 16	1629-121	2400 S 240th St, Des Moines, WA 98198	Eligible
Park of the Pines	Park of the Pines (Auditorium)	247	23458 S 32nd Ave, Kent, WA 98032	Not Eligible
	Park of the Pines (Lot 7)	n/a	23458 30th Ave S, Kent, WA 98032	Not Eligible
	Park of the Pines (Lot 8)	n/a	23634 30th Ave S, Kent, WA 98032	Not Eligible
Calvary Lutheran Church	Calvary Lutheran Church	7499-293	2415 S 320th St, Federal Way, WA 98003	Eligible



Data Sources: King County, Cities of Des Moines, Federal Way, Kent, SeaTac (2013).

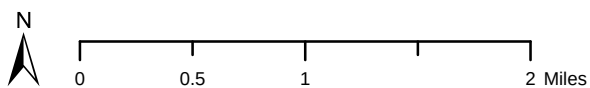


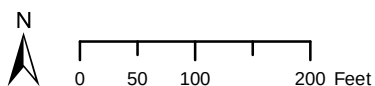
Exhibit 1
HPI Form Locations

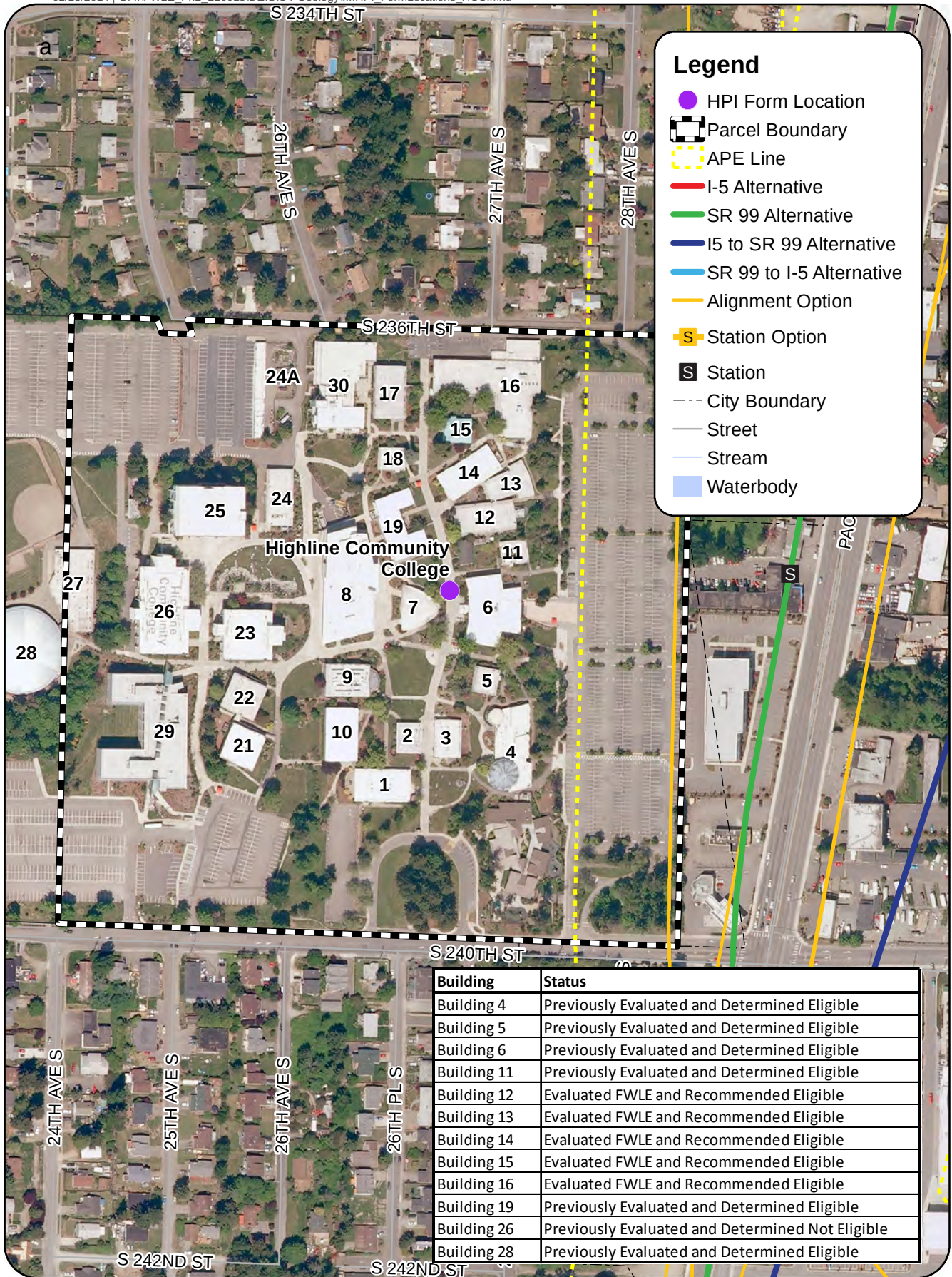


Data Sources: King County, Cities of Des Moines, Federal Way, Kent, SeaTac (2013).

Exhibit 2

HPI Form Locations - Highline Water District Water Towers





Data Sources: King County, Cities of Des Moines, Federal Way, Kent, SeaTac (2013).

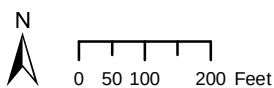
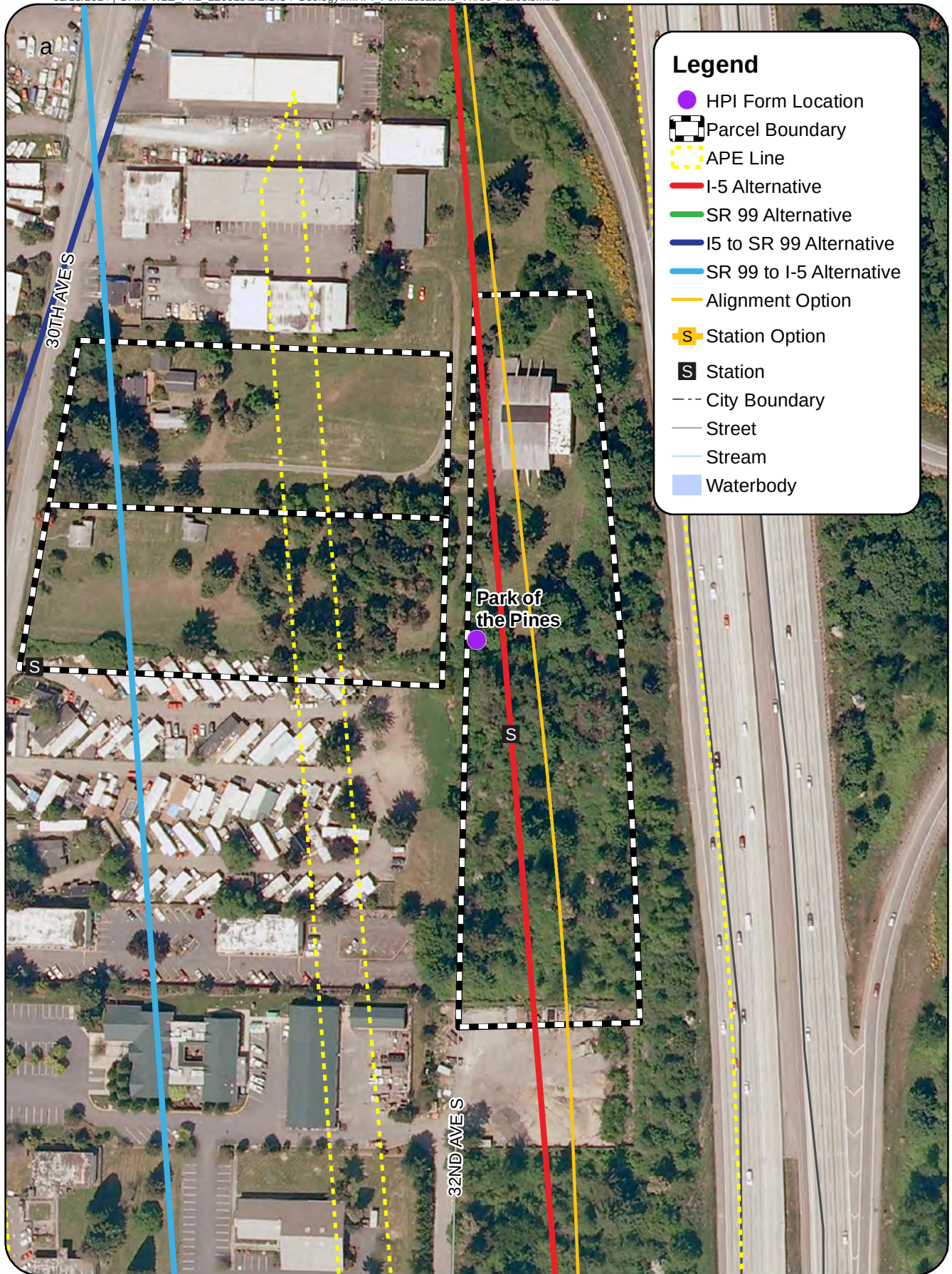


Exhibit 3 HPI Form Locations - Highline Community College



Data Sources: King County, Cities of Des Moines, Federal Way, Kent, SeaTac (2013).

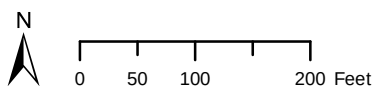
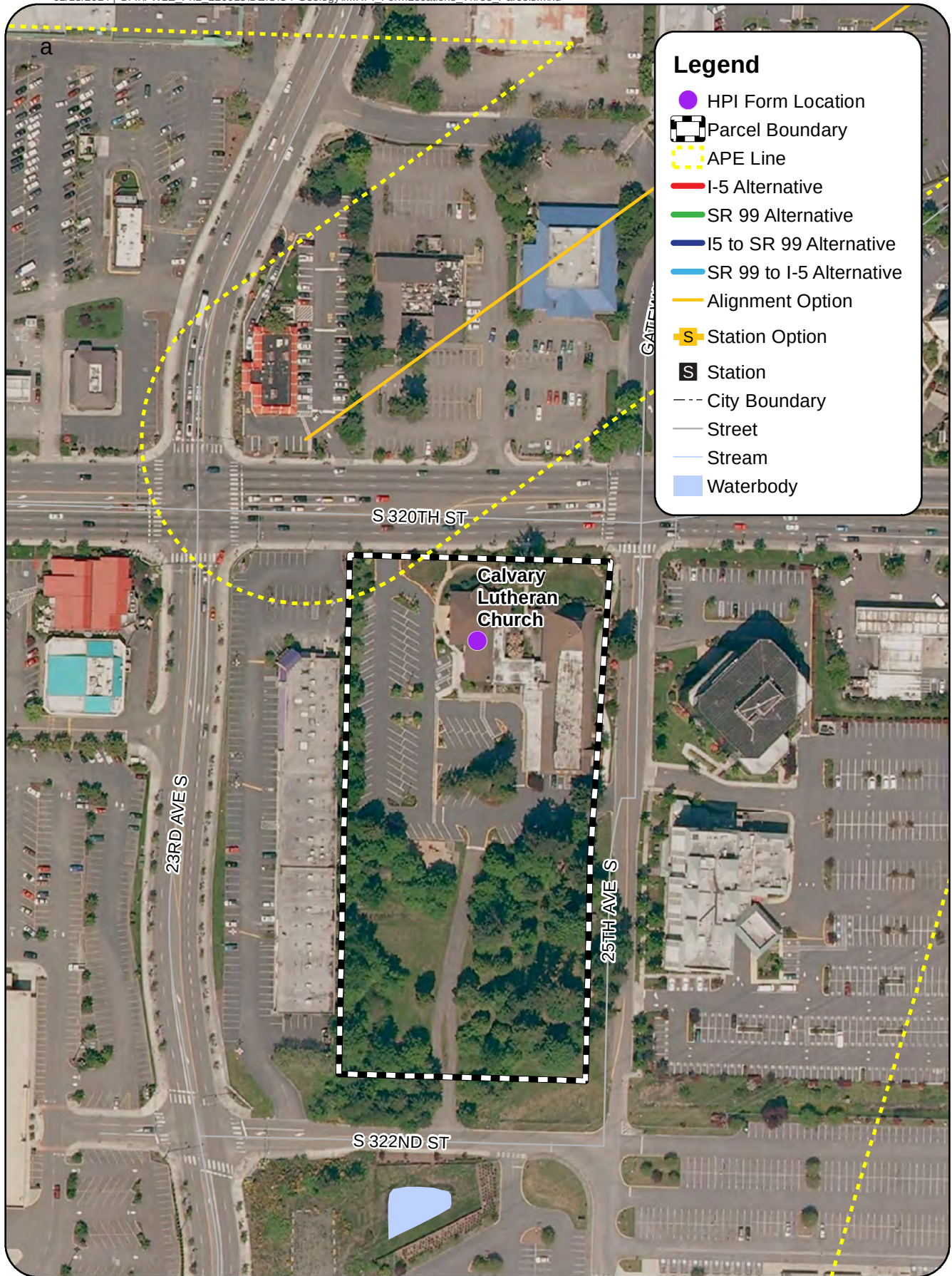


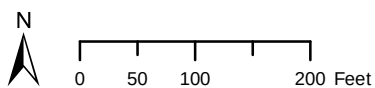
Exhibit 4
HPI Form Locations - Park of the Pines



Data Sources: King County, Cities of Des Moines, Federal Way, Kent, SeaTac (2013).

Exhibit 5

HPI Form Locations - Calvary Lutheran Church





Historic Inventory Report

Location

Field Site No. DAHP No.

Historic Name: King County Water District 75 water tanks

Common Name: Highline Water District water tanks

Property Address: 21420 31st Ave S, SeaTac, WA 98198

Comments:

Tax No./Parcel No. 0922049235

Plat/Block/Lot

Acreage 4.43

Supplemental Map(s)

Township/Range/EW	Section	1/4 Sec	1/4 1/4 Sec	County	Quadrangle
T22R04E	09			King	DES MOINES

Coordinate Reference

Easting: 1196343

Northing: 762144

Projection: Washington State Plane South

Datum: HARN (feet)

Identification

Survey Name: Sound Transit Federal Way Date Recorded: 01/13/2014

Field Recorder: MaryNell Nolan-Wheatley

Owner's Name: Highline Water District

Owner Address: 23828 30TH AVE S

City: Kent State: WA Zip: 98032

Classification: Structure

Resource Status: Comments:

Survey/Inventory

Within a District? No

Contributing? No

National Register:

Local District:

National Register District/Thematic Nomination Name:

Eligibility Status: Not Determined - SHPO

Determination Date: 1/1/0001

Determination Comments:



Historic Inventory Report

Description

Historic Use: Government - Public Works	Current Use: Government - Public Works		
Plan: Round	Stories: 1		
Changes to Plan: Intact	Structural System: Steel		
Changes to Original Cladding: Intact	Changes to Interior: Unknown		
Changes to Other:	Changes to Windows: Not Applicable		
Other (specify):			
Style:	Cladding:	Roof Type:	Roof Material:
Other - Utilitarian	Metal	Dome	Metal
Foundation:	Form/Type:		
Concrete - Poured	Utilitarian		

Narrative

Study Unit	Other
Community Planning/Development	
Architecture/Landscape Architecture	
Date of Construction:	1950 Built Date
	1959 Built Date
	1962 Built Date
	1968 Built Date
	Builder: Chicago Bridge and Iron Company
	Engineer:
	Architect:

Property appears to meet criteria for the National Register of Historic Places: No

Property is located in a potential historic district (National and/or local): No

Property potentially contributes to a historic district (National and/or local): No

Statement of Significance: Construction of the original Highway 1 in the state of Washington commenced in 1913. By October 1923, 700 miles of a two-lane highway had been completed connecting Vancouver, British Columbia, to the Oregon-California border. Just after the highway was completed in 1924, however, plans were begun to reroute and improve the conditions of the highway. The project involved creating a new, wider, four-lane route further west that would connect Seattle and Tacoma, Washington, more directly (Kramak, 2010). The new roadway was completed in 1928 and acquired the title of Highway 1, while the original eastern route was renamed Highway 5 (Caster, 2007). The new Highway 1 became known as the Pacific Highway. Over the years, various parts of Highway 1 acquired alternative names, including the portion known as Pacific Highway S, which starts near Federal Way, Washington, and continues north, through Kent, Des Moines, and SeaTac, Washington (Kramak, 2010).

Historic Inventory Report

In 1926, Pacific Highway (HWY 1) was included as a numbered U.S. Highway (US 99) (U.S. Route 99, 2013). The following decades witnessed the rapid growth of businesses along the highway and the formation of a new auto-oriented roadside culture characterized by a proliferation of motels, restaurants, and rest stops (Des Moines Historical Society, 2007). Increased automobile ownership changed people's perceptions about distance and allowed populations to sprawl around urban centers, increasing the number of residents in suburban towns and cities, including SeaTac, Des Moines, Kent, and Federal Way (Boyles, 2010).

The City of SeaTac, which was incorporated in 1990, is named for the airport, which is now surrounded by the city. Before the airport was constructed in the 1940s, however, the rural area was commonly referred to by locals as Angle Lake, an allusion to the body of water in the Highline region next to where the airport now stands (City of SeaTac, 2013; Highline Historical Society, 2013). Early development in the area started after the 1883 construction of Northern Pacific's transcontinental railroad to Puget Sound, which brought an influx of settlers and farmers. During the 1930s and 1940s, a wave of new businesses opened along the new Pacific Highway, which passed Angle Lake, to serve the needs of those traveling by automobile (Dorpat and Crowley, 2004). Construction on the Seattle-Tacoma International Airport (Sea-Tac Airport) started in January 1943. The new airport and the adjacent Interstate 5 freeway that was completed in the 1960s changed many aspects of the community. Much of the existing housing stock in SeaTac dates to the period of planning and construction for the airport, from the 1930s-1950s.

The Highline Water District was formed as the King County Water District 75 in 1946. From 1962 through 1989, several mergers with other water districts occurred, leading to the present service area. The name was changed to Highline Water District in 1991 (Highline Water District 2012). Currently, the District serves large sections of the cities of Des Moines and Normandy Park, as well as parts of Tukwila, Burien, SeaTac, Federal Way, Kent, and unincorporated King County, for a total service area of approximately 18 square miles (Highline Water District, 2013). The District water system includes nine water storage structures, six pump stations, 29 pressure-reducing stations, 11 pressure zones and approximately 292 miles of water mains (Highline Water District, 2012).

The property at 21420 31st Avenue South in SeaTac, Washington, which contains two elevated water towers constructed in circa 1950 and 1962 respectively and two ground level reservoir tanks constructed in 1959 and 1968 respectively, is not eligible for listing in the NRHP. The property is not eligible for the NRHP under Criterion A, which applies to buildings or structures that are associated with events that have made a significant contribution to the broad patterns of history, as no significant events are associated with this property. The water storage facilities were built as needed to accommodate the growth of the surrounding suburban communities, as was typical nationwide. To be eligible for the NRHP under Criterion B, a property must be directly associated with a person considered significant within a historic context whose specific contribution to history has been both identified and documented. No such person who meets that definition is linked to these structures. The property is not eligible for the NRHP under Criterion C as it contains typical elevated water towers and ground level tanks that lack any distinguishing features and do not embody the distinctive characteristics of a type, period, or method of construction; they are not the work of a master and do not possess high artistic value. Many water storage structures in the United States have been recognized for their architectural significance and unique designs, but these four structures are unremarkable and thousands of similar ones exist throughout the country. In addition, the Highline Water District has nine water storage structures, so these four are not unique to the area. The structures are not eligible for the NRHP under Criterion D for information potential because their materials and construction methods do not convey important information that could contribute to understanding history or prehistory. Therefore, the structures are not eligible for listing in the NRHP because they do not meet any of the eligibility criteria. The water towers and the tanks appear largely intact, and therefore retain integrity of location, design, setting, materials, workmanship, feeling, and association.

Historic Inventory Report

Description of
Physical
Appearance:

The Highline Water District facility is located at 21420 31st Avenue South in SeaTac, Washington. The property contains two elevated water towers constructed in circa 1950 and 1962 respectively and two large, cylindrical, ground level water reservoir tanks constructed in 1959 and 1968 respectively. The utilitarian structures are all constructed on poured concrete foundations and are surrounded by grass and gravel. A paved driveway passes through the center of the parcel, between the two elevated towers. The four structures are located in a residential area of the city, directly adjacent to Interstate 5.

The circa 1950 water tower is the shorter of the two elevated water towers and is located on the west side of the property. Painted light green, the metal water tower is composed of a spherical water tank supported by six legs and a central metal support pole. A metal catwalk with an open framework handrail circumscribes the outer edge of the raised tank. Two levels of crossed metal beams in between each of the legs provide reinforced support—one level runs across the top of the legs and the other along the bottom. A metal ladder runs up one of the north legs, reaching the catwalk and then continuing onto the top of the dome roof. The ladder is enclosed by a cylindrical, metal frame, safety grate. A small concrete, rectangular plan utility equipment building with a flat roof is located at the base of the central support post and is painted yellow. Cellular panels have been added to the catwalk railing and two communication antennae have been attached to the main tank (DAHP, 2013a).

Adjacent to the east side of the circa 1950 water tower is the 1962 water tower, which is the tallest structure on the facility. Constructed on a poured concrete foundation, the steel water tank has eight supporting legs and one central supporting metal post. Two levels of crossed metal beams in between each of the legs provide reinforced support—one level runs across the top of the legs and the other along the bottom. A metal catwalk wraps around the outer circumference of the spherical water tank. A metal ladder extends along one of the northwest legs from the ground to the catwalk, before continuing to the crown of the water tank. Painted light green, the metal tower has nine antennae that extend from the catwalk and nine antennae that project from the domed roof of the water tank (DAHP, 2013b). Two cellular equipment shelters are located at the base of the tower's legs.

Northeast of the taller, 1962 water tower is a large, ground level water reservoir tank that was constructed in 1959. The welded steel structure has a diameter of approximately 136 feet and a height of 23 feet. The upper edges of the container, where the exterior walls meet the roof, are rounded. The roof is a very shallow dome shape that comes to a subtle point in the center. The total volume of the tank is 2.5 million gallons.

South of the 1959 tank, and just southeast of the 1962 water tower, is a larger, ground level water reservoir tank that was constructed in 1968. The steel structure was welded by Horton Automatic Welding Machine of the Chicago Bridge and Iron Company in Oak Brook, Illinois. The tank has an approximate diameter of 200 feet and a height of 21 feet. The upper edges of the container, where the exterior wall meets the roof, are rounded. The tank is covered by a shallow dome-shaped, steel roof that comes to a subtle point in the center. The total volume of the tank is 5 million gallons.

Historic Inventory Report

Major Bibliographic References:

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U.S. Route 99 – The Pacific Highway. 2013. Waymarking: A Groundspeak Website. Available at: <http://www.waymarking.com/cat/details.aspx?f=1&guid=698ed7e3-3af8-4cd0-a795-03b89a23288e&exp=True>. Accessed March 19, 2013.

Photos



c. 1950 water tower on left, 1962 water tower on right
View to the northeast
2014



View to the north, c. 1950 water tower
2014



View to the north, 1962 water tower
2014



View to the northwest, 1959 water reservoir
2014

Historic Inventory Report



View to the west, 1968 water reservoir
2014



Label on 1968 water reservoir, detail
2014

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Historic Inventory Report

Location

Field Site No. 247
Historic Name: Park of the Pines
Common Name: Park of the Pines
Property Address: 23458 30th Ave S, Kent, WA 98032
Comments:
Tax No./Parcel No. 2500600420
Plat/Block/Lot Block 4/Lot 7
Acreage 2.15
Supplemental Map(s)

DAHP No.

Township/Range/EW	Section	1/4 Sec	1/4 1/4 Sec	County	Quadrangle
T22R04E	16			King	DES MOINES

Coordinate Reference

Easting: 1196246
Northing: 754963
Projection: Washington State Plane South
Datum: HARN (feet)

Identification

Survey Name: Sound Transit Federal Way
Field Recorder: Lori Durio Price
Owner's Name: Duff, Ethel M.
Owner Address: 23458 30TH AVENUE SOUTH
City: Kent
State: Washington
Zip: 98032
Classification: Building
Resource Status: Survey/Inventory
Comments:
Within a District? No
Contributing?
National Register:
Local District:
National Register District/Thematic Nomination Name:
Eligibility Status: Not Determined - SHPO
Determination Date: 1/1/0001
Determination Comments:

Date Recorded: 07/20/2012



Historic Inventory Report

Description

Historic Use: Domestic - Single Family House	Current Use: Domestic - Single Family House		
Plan: Square	Stories: 1		
Changes to Plan: Extensive	Structural System: Balloon Frame		
Changes to Original Cladding: Extensive	Changes to Interior: Unknown		
Changes to Other:	Changes to Windows: Intact		
Other (specify):			
Style:	Cladding:	Roof Type:	Roof Material:
Modern - Minimal Traditional	Shingle	Gable - Side Gable	Asphalt / Composition
Foundation:	Form/Type:		
Concrete - Block	Single Family - Side Gable		

Narrative

Study Unit	Other
Religion	
Date of Construction:	1947 Built Date
	1949 Remodel
	Builder:
	Engineer:
	Architect:

Property appears to meet criteria for the National Register of Historic Places: No

Property is located in a potential historic district (National and/or local): No

Property potentially contributes to a historic district (National and/or local): No

Statement of Significance: This property is the primary residential portion of the Park of the Pines, a non-denominational Christian conference center founded in 1968 by the Reverend Haldane Duff and his wife Ethel. Park of the Pines covers three contiguous parcels and contains five primary buildings, including these two houses. Reverend Duff came from an influential religious family and in addition to founding the Park of the Pines, he served several area churches and hosted a radio program, "World's Greatest Book Quiz." Reverend Duff is deceased but Ethel still resides on the property.

Historic Inventory Report

Haldane J. Duff (1913 – 1992) was born in Minnesota, the youngest of five children, to parents who had emigrated from Ireland in 1912. In 1914 the family moved to Portland, Oregon. His father, Walter Duff, Sr., had served as an evangelical pastor in Ireland and continued his evangelistic ministry in Oregon for another 33 years. He was also the founder of the Irish Christian Workers Union in 1898, and the American Christian Workers Union in 1937 (Telling The Truth 2010). All four of Haldane Duff's siblings were born in Ireland, and they all became involved in Christian ministry. His only brother, Walter Duff, Jr., became a pastor and served at several churches in Oregon, and eventually helped found Village Missions, a mission to send pastors to rural areas, in 1948. He became its full time director in 1953. Village Missions continues to grow, and in 2011 it served 210 communities throughout the United States and Canada (Village Missions 2013). Haldane's sisters, Helen, Evangeline, and Olive, formed the Duff Sisters Gospel Trio and traveled the western United States, conducting evangelistic meetings in rural communities. In 1929, his sister Helen married a banker named Elwood Baugh and founded the Christian Business Women's Council of America in 1938, and Stonecroft Ministries 10 years later. Stonecroft Ministries remains a successful organization, with more than 25,000 volunteers conducting more than 8,000 outreach events in 2011, including a presence in 60 foreign countries (Stonecroft Ministries 2013). Evangeline and her husband, Archie McNeill, founded the Cannon Beach Christian Conference Center in Cannon Beach, Oregon, in 1945. Still active, the Cannon Beach Christian Conference Center is a non-denominational Christian retreat and conference center that employs 60 full-time, year-round staff and over 80 summer staff. It is recognized as "one of the premier Christian retreat and conference centers on the West Coast" (Cannon Beach Christian Conference Center 2013). Olive married Charles Huddleston who became a minister in the Methodist Church. Olive was a school teacher and served as Christian education director at several of her husband's churches. She was also a social worker for Child Protective Services in Tulare County, California (The Kaleah Commonwealth Online 2007).

The Park of the Pines is a non-denominational summer church conference that operates from July to September. It is now run primarily by Ethel Duff (Haldane's widow), and has only one employee. In 2011, it listed income of \$58,119 (Find the Company, 2012). In 2012, it reduced its services to 5 days a week for 5 weeks (Park of the Pines, 2013).

By contrast to the religious organizations founded by three of his four siblings, the Park of the Pines is a very small operation. While three older Duff siblings were influential in establishing large religious organizations, Haldane Duff appears to have been less prominent, and the Park of the Pines is the smallest and by far the most modest of the Duff religious centers. Inquiries at the Federal Way Historical Society, Greater Kent Historical Society Museum, and Des Moines Historical Society did not provide any information on the Park of the Pines or Reverend Duff. Reverend Duff does not appear to qualify as an individually significant person in the context of the history of Kent or King County, or in the context of religious ministry and evangelism. No significant events are associated with the property. Therefore, these two houses do not appear to be associated with important persons or events and are not eligible for the NRHP under Criterion A or B.

The houses are not architecturally distinctive and Building A has been subject to extensive alterations. They are vernacular structures with little or no design elements. Therefore, these two houses are not eligible for the NRHP under Criterion C.

The buildings employed standard construction techniques; the material and construction methods do not convey important information that could contribute to understanding history or prehistory. The buildings are not eligible under Criterion D for information potential.

Although all of the buildings on the property appear to be associated with the Park of the Pines conference center, they do not comprise an eligible historic district. They were not built to serve the conference center, but rather are a loose collection of residential and accessory buildings that pre-date the formation of the conference center. They are not united by any visible plan, do not appear to share any significant historic context, and are unremarkable architecturally. Therefore they are not eligible for the NRHP either individually or as a historic district.

Historic Inventory Report

Description of Physical Appearance:

The property contains two small residential buildings on land designated by King County as Lot 7. The larger house (denoted as Building A by the King County Assessor) was originally built in 1947, then remodeled in 1948-49. It is a one-story, single-family residence in a Minimal Traditional style. It has 780 square feet and a nearly square footprint. It has a concrete block foundation, wood-frame construction, and a side-gabled roof of composition shingle with shallow boxed eaves. The exterior is clad in wood shake. There is a small front-gabled porch at the entry, supported on two simple wood posts. There are two chimneys, a smaller one on the rear slope of the roof and a larger exterior one on the north elevation. Windows are wood, with four horizontal panes. When originally built, the house was much smaller (280 square feet) and the entry was on the south elevation. The remodeling of 1948-49 moved the entry to the west elevation, in its current location, and wrapped new construction around the north and east sides of the building. The exterior was changed from shiplap wood siding to wood shake siding, the foundation was upgraded from split cedar to concrete block, and the large exterior chimney on the north elevation was added.

The second residence on Lot 7 (Building B) is located southeast of Building A. Constructed in 1956, it is a one-story residence similar in style to Building A but smaller at 634 square feet. It has a poured concrete foundation, wood-frame construction, and a rectangular footprint with a small ell at the rear. The exterior is clad in wood shingles. The roof is a front gable of composition shingle with a shallow overhang. The entry is slightly recessed and shielded by a flat roof on wooden posts. Windows are wood, with a large front window of three horizontal panes. Other windows vary in configuration, but appear to have horizontal panes as well. Building B appears much as it did when originally built.

Also on Lot 7 are three small accessory buildings, which appear to be garages or storage sheds. They are located to the east of Building A and date from 1949, 1950, and 1951.

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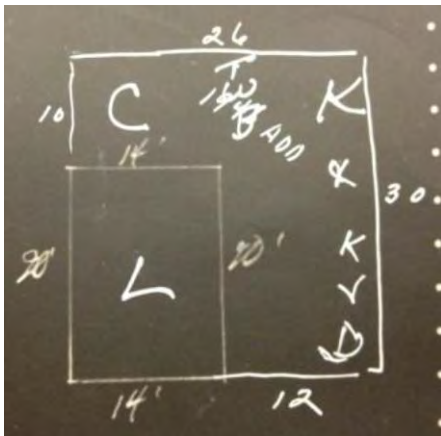
Photos



Building A and B from the public right-of-way, view looking northeast
2012



Park of the Pines sign
2012



Bldg A floorplan showing addition
2012



This is Bldg A in 1947, as originally built southwest corner
1947

Historic Inventory Report



This is Bldg A during renovation, 1948
 southwest corner
 1948



This is Bldg A shortly after renovation, with shed/garage
 visible to the rear.
 southwest corner
 1949



Bldg A in 1957, similar in appearance to current view
 Front (west) elevation
 1957



Bldg B shortly after construction
 northwest corner
 1957



Historic Inventory Report

Building A, southwest corner
2013

Building B, southwest corner
2013



Buildings A and B, south elevation
2013

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Historic Inventory Report

Location

Field Site No. 247
DAHP No.
Historic Name: Park of the Pines
Common Name: Park of the Pines
Property Address: 23634 30th Ave S, Kent, WA 98032
Comments:
Tax No./Parcel No. 2500600425
Plat/Block/Lot Block 4/Lot 8
Acreage 2.30
Supplemental Map(s)

Township/Range/EW	Section	1/4 Sec	1/4 1/4 Sec	County	Quadrangle
T22R04E	16			King	DES MOINES

Coordinate Reference

Easting: 1196111
Northing: 754783
Projection: Washington State Plane South
Datum: HARN (feet)

Identification

Survey Name: Sound Transit Federal Way
Date Recorded: 07/20/2012
Field Recorder: Lori Durio Price
Owner's Name: World's Greatest Book Broadcasting
Owner Address: 23458 30th Avenue South
City: Kent
State: Washington
Zip: 98032
Classification: Building
Resource Status:
Survey/Inventory
Comments:
Within a District? No
Contributing?
National Register:
Local District:
National Register District/Thematic Nomination Name:
Eligibility Status: Not Determined - SHPO
Determination Date: 1/1/0001
Determination Comments:



Historic Inventory Report

Description

Historic Use: Domestic - Single Family House	Current Use: Domestic - Single Family House		
Plan: Square	Stories: 1		
Changes to Plan: Slight	Structural System: Balloon Frame		
Changes to Original Cladding: Moderate	Changes to Interior: Unknown		
Changes to Other:	Changes to Windows: Extensive		
Other (specify):			
Style:	Cladding:	Roof Type:	Roof Material:
Modern - Minimal Traditional	Shingle	Gable - Side Gable	Asphalt / Composition
Foundation:	Form/Type:		
Concrete - Block	Single Family - Side Gable		

Narrative

Study Unit	Other
Religion	
Date of Construction:	1936 Built Date
	1947 Remodel
	1951 Remodel
	Builder:
	Engineer:
	Architect:

Property appears to meet criteria for the National Register of Historic Places: No

Property is located in a potential historic district (National and/or local): No

Property potentially contributes to a historic district (National and/or local): No

Statement of Significance: This property is part of the residential portion of the Park of the Pines, a non-denominational Christian conference center founded in 1968 by the Reverend Haldane Duff and his wife Ethel. Park of the Pines covers three contiguous parcels and contains five primary buildings, including these two houses. Reverend Duff came from an influential religious family and in addition to founding the Park of the Pines, he served several area churches and hosted a radio program, "World's Greatest Book Quiz." Reverend Duff is deceased but Ethel still resides on the property.

Historic Inventory Report

Haldane J. Duff (1913 – 1992) was born in Minnesota, the youngest of five children, to parents who had emigrated from Ireland in 1912. In 1914 the family moved to Portland, Oregon. His father, Walter Duff, Sr., had served as an evangelical pastor in Ireland and continued his evangelistic ministry in Oregon for another 33 years. He was also the founder of the Irish Christian Workers Union in 1898, and the American Christian Workers Union in 1937 (Telling The Truth 2010). All four of Haldane Duff's siblings were born in Ireland, and they all became involved in Christian ministry. His only brother, Walter Duff, Jr., became a pastor and served at several churches in Oregon, and eventually helped found Village Missions, a mission to send pastors to rural areas, in 1948. He became its full time director in 1953. Village Missions continues to grow, and in 2011 it served 210 communities throughout the United States and Canada (Village Missions 2013). Haldane's sisters, Helen, Evangeline, and Olive, formed the Duff Sisters Gospel Trio and traveled the western United States, conducting evangelistic meetings in rural communities. In 1929, his sister Helen married a banker named Elwood Baugh and founded the Christian Business Women's Council of America in 1938, and Stonecroft Ministries 10 years later. Stonecroft Ministries remains a successful organization, with more than 25,000 volunteers conducting more than 8,000 outreach events in 2011, including a presence in 60 foreign countries (Stonecroft Ministries 2013). Evangeline and her husband, Archie McNeill, founded the Cannon Beach Christian Conference Center in Cannon Beach, Oregon, in 1945. Still active, the Cannon Beach Christian Conference Center is a non-denominational Christian retreat and conference center that employs 60 full-time, year-round staff and over 80 summer staff. It is recognized as "one of the premier Christian retreat and conference centers on the West Coast" (Cannon Beach Christian Conference Center 2013). Olive married Charles Huddleston who became a minister in the Methodist Church. Olive was a school teacher and served as Christian education director at several of her husband's churches. She was also a social worker for Child Protective Services in Tulare County, California (The Kaleah Commonwealth Online 2007).

The Park of the Pines is a non-denominational summer church conference that operates from July to September. It is now run primarily by Ethel Duff (Haldane's widow), and has only one employee. In 2011, it listed income of \$58,119 (Find the Company, 2012). In 2012, it reduced its services to 5 days a week for 5 weeks (Park of the Pines, 2013).

By contrast to the religious organizations founded by three of his four siblings, the Park of the Pines is a very small operation. While three older Duff siblings were influential in establishing large religious organizations, Haldane Duff appears to have been less prominent, and the Park of the Pines is the smallest and by far the most modest of the Duff religious centers. Inquiries at the Federal Way Historical Society, Greater Kent Historical Society Museum, and Des Moines Historical Society did not provide any information on the Park of the Pines or Reverend Duff. Reverend Duff does not appear to qualify as an individually significant person in the context of the history of Kent or King County, or in the context of religious ministry and evangelism. No significant events are associated with the property. Therefore, these two houses do not appear to be associated with important persons or events and are not eligible for the NRHP under Criterion A or B.

The houses are not architecturally distinctive and both have been subject to extensive alterations. They are vernacular structures with little or no design elements. Therefore, these two houses are not eligible for the NRHP under Criterion C.

The buildings employed standard construction techniques; the material and construction methods do not convey important information that could contribute to understanding history or prehistory. The buildings are not eligible under Criterion D for information potential.

Although all of the buildings on the property appear to be associated with the Park of the Pines conference center, they do not comprise an eligible historic district. They were not built to serve the conference center, but rather are a loose collection of residential and accessory buildings that pre-date the formation of the conference center. They are not united by any visible plan, do not appear to share any significant historic context, and are unremarkable architecturally. Therefore they are not eligible for the NRHP either individually or as a historic district.

Historic Inventory Report

Description of
Physical
Appearance:

Lot 8 contains the oldest buildings remaining on the Park of the Pines property—two 1930s cottages denoted as Building A and Building B. Building A sits closest to the road and was originally built in 1936. It was remodeled in 1947 and 1951. It is a one-story, wood-frame residence in the Minimal Traditional style with a square footprint encompassing 648 square feet. It has a side-gabled roof of composition shingle with open eaves. The foundation is concrete block, and the exterior is clad in wood shingles. There is a small chimney on the rear slope of the roof, near the ridgeline. The front façade is three bays wide with a center entry door shielded by a front-gabled roof on simple wooden knee brackets. The entry is accessed by concrete steps with a shallow landing and metal railings. On either side of the door is a wood, one-over-one window with a wood flower box. Side windows are also one-over-one. There is a small ell at the rear corner of the north elevation that is an added, enclosed porch. It has a side-gabled roof and single-light sliding sash windows. A historical photo shows that the house originally was clad in large wood shakes and had a tarpaper roof with no chimney. The front elevation openings were different, and had six-light casement windows that appear now to be on the side elevations of the garage. By 1947, photos show the house much as it looks today.

To the north of Building A is a small wood-frame garage dating from 1951. It has a front-gabled roof of composition shingles and the exterior is clad in wood shingles to match the house. The front (west) elevation has a pair of simple wood doors; the side elevations each have two six-light wood casement windows.

Building B on Lot 8 is located northeast of Building A and is set back from the road. This is the oldest building on the property, dating from 1931, and also the most altered. The entry is on the north elevation, so the house does not face the street. It has an irregular footprint and a front-gabled roof of composition shingle, with a small chimney on the rear roof slope. The house sits on a concrete block foundation and the exterior is clad in wood shingles. There is a single one-over-one wood window in the middle of the west elevation. The entry has a poured concrete porch and simple wood railings, and is shielded under a front-gabled roof supported on simple wood posts. There is a shed-roofed addition on the east elevation. The building was remodeled in 1941 and 1951, and appears to have had numerous additions. It was originally only 280 square feet and the foundation was described as “mud sills.” A photo from 1947 shows that the house did have an entry door on the west elevation, along with three windows. It appears this was changed and the current entry added in 1951.

Historic Inventory Report

Major
Bibliographic
References:

Ancestry.com. Haldane Duff in the 1940 Census. http://www.ancestry.com/1940-census/usa/Oregon/Haldane-Duff_252mlk. Accessed January 2, 2013.

Cannon Beach Christian Conference Center. 2013. Who We Are. http://www.cbcc.net/we_are.php. Accessed January 2, 2013.

Find the Company. 2013. Park of the Pines Church in Kent, WA. <http://companies.findthecompany.com/I/11648236/Park-Of-The-Pines-Church-in-Kent-WA>. Accessed January 2, 2013.

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Stonecroft Ministries. 2013. Our History. <http://www.stonecroft.org/home/about/>. Accessed January 2, 2013.

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The Kaleah Commonwealth Online. 2007. "Obituary: Olive Huddleston 1908-2007." <http://www.kawahcommonwealth.com/02-16-07features.htm>. Accessed January 18, 2013.

Village Missions. 2013. The Founding of the Mission. <http://www.village-missions.org/about/history-founding.php>. Accessed January 2, 2013.

Photos



Bldg A - Bldg B can be seen in the rear, in the right side of the photo
 front facade and southeast corner
 2012



Bldg A - undated historic photo taken shortly after construction.
 front (west) facade, facing southeast
 2013



Bldg A, 1947 photo showing renovated appearance, similar to today. Bldg B can be seen in the rear at the right of the photo.
 Front facade, facing northeast
 1947



Bldg B in 1951, showing renovated property similar to current appearance
 front (west) elevation
 1951

Historic Inventory Report



Bldg B
 West elevation
 2012



Bldg A is to the far right, Bldg B is in the center, and the
 garage is to the far left.
 Lot 8 buildings, facing east
 2012



Bldg B in 1947, showing previous west elevation with entry
 that faced the street.
 southwest corner
 1947



Building A, northwest corner
 2013



Historic Inventory Report

East elevation, Building A, with garage on right
2013

Building B, northwest corner
2013



Building B, southeast corner
2013



Historic Inventory Report

Location

Field Site No. 247
Historic Name: Park of the Pines
Common Name: Park of the Pines
Property Address: 23458 S 32nd Ave, Kent, WA 98032
Comments:
Tax No./Parcel No. 1522049018
Plat/Block/Lot N/A
Acreage 3.81
Supplemental Map(s)

DAHP No.

Township/Range/EW	Section	1/4 Sec	1/4 1/4 Sec	County	Quadrangle
T22R04E	15			King	DES MOINES

Coordinate Reference

Easting: 1196646
Northing: 754919
Projection: Washington State Plane South
Datum: HARN (feet)

Identification

Survey Name: Sound Transit Federal Way Link
Field Recorder: MaryNell Nolan-Wheatley
Owner's Name: World's Greatest Book Broadcasters
Owner Address: 23458 30th Ave S
City: Kent
State: Washington
Zip: 98032
Classification: Building
Resource Status: Survey/Inventory
Comments:
Within a District? No
Contributing? No
National Register:
Local District:
National Register District/Thematic Nomination Name:
Eligibility Status: Not Determined - SHPO
Determination Date: 1/1/0001
Determination Comments:

Date Recorded: 10/21/2013



Historic Inventory Report

Description

Historic Use: Recreation and Culture - Auditorium Current Use: Recreation and Culture - Auditorium
Plan: Rectangle Stories: 1 Structural System: Concrete - Block
Changes to Plan: Intact Changes to Interior: Intact
Changes to Original Cladding: Intact Changes to Windows: Slight
Changes to Other:
Other (specify):
Style: Cladding: Roof Type: Roof Material:
Modern - Quonset Hut Concrete - Block Shed Asphalt / Composition -
Wood - Plywood Barrel Vault Rolled
Asphalt / Composition -
Built Up
Foundation: Form/Type:
Concrete - Poured Other

Narrative

Study Unit Other
Religion
Architecture/Landscape Architecture
Date of Construction: 1969 Built Date Builder: Haldane Duff
1961 Built Date
Engineer:
Architect: Harvey R. Dodd and Associates

Property appears to meet criteria for the National Register of Historic Places: No

Property is located in a potential historic district (National and/or local): No

Property potentially contributes to a historic district (National and/or local): No

Statement of Significance: Park of the Pines was founded in 1968 by the Reverend Haldane Duff and his wife Ethel. Reverend Duff came from an influential religious family. In addition to founding the Park of the Pines, he served several area churches and hosted a radio program called the "World's Greatest Book Quiz."

Historic Inventory Report

Haldane J. Duff (1913 – 1992) was born in Minnesota, the youngest of five children, to parents who had emigrated from Ireland in 1912. In 1914 the family moved to Portland, Oregon. His father, Walter Duff, Sr., had served as an evangelical pastor in Ireland and continued his evangelistic ministry in Oregon for another 33 years. He was also the founder of the Irish Christian Workers Union in 1898, and the American Christian Workers Union in 1937 (Telling The Truth, 2010). All four of Haldane Duff's siblings were born in Ireland and became involved in Christian ministry. His only brother, Walter Duff, Jr., became a pastor and served at several churches in Oregon, and in 1948 helped found Village Missions, a mission to send pastors to rural areas. He became its full time director in 1953. Village Missions continues to grow, and in 2011 it served 210 communities throughout the United States and Canada (Village Missions, 2013). Haldane's sisters, Helen, Evangeline, and Olive, formed the Duff Sisters Gospel Trio and traveled the western United States, conducting evangelistic meetings in rural communities. In 1929, his sister Helen married a banker named Elwood Baugh and founded the Christian Business Women's Council of America in 1938, and Stonecroft Ministries 10 years later. Stonecroft Ministries remains a successful organization, with more than 25,000 volunteers who conducted more than 8,000 outreach events in 2011, and maintain a presence in 60 foreign countries (Stonecroft Ministries, 2013). Evangeline and her husband, Archie McNeill, founded the Cannon Beach Christian Conference Center in Cannon Beach, Oregon, in 1945. Still active, the Cannon Beach Christian Conference Center is a non-denominational Christian retreat and conference center that employs 60 full-time, year-round staff and over 80 summer staff. It is recognized as "one of the premier Christian retreat and conference centers on the West Coast" (Cannon Beach Christian Conference Center, 2013). Olive married Charles Huddleston who became a minister in the Methodist Church. Olive was a school teacher and served as Christian education director at several of her husband's churches. She was also a social worker for Child Protective Services in Tulare County, California (The Kaleah Commonwealth Online, 2007).

The Park of the Pines is a very small, non-denominational summer church conference that operates from July to September. It is now run primarily by Ethel Duff (Haldane's widow), and has only one employee. In 2011, it listed income of \$58,119 (Find the Company, 2012). In 2012, it reduced its services to 5 days a week for 5 weeks (Park of the Pines, 2013).

While three older Duff siblings were influential in establishing large religious organizations, Haldane Duff appears to have been less prominent, and the Park of the Pines is the smallest and by far the most modest of the Duff religious centers. Inquiries at the Federal Way Historical Society, Greater Kent Historical Society Museum, and Des Moines Historical Society did not provide any information on the Park of the Pines or Reverend Duff. Reverend Duff does not appear to qualify as a significant person in the context of the history of Kent or King County, or in the context of religious ministry and evangelism. No significant events are associated with the Park of the Pines. Therefore, the Park of the Pines Auditorium does not appear to be associated with important persons or events and is not eligible for the NRHP under Criterion A or B.

The Park of the Pines Auditorium is not architecturally distinctive on the exterior or interior. The building is a utilitarian space intended to serve visiting groups for religious and social functions. It was designed by the firm of a prominent structural engineer, Harvey Dodd, but has few design elements and is not a representative example of his work. Mr. Dodd worked on the Seattle Space Needle and the Kingdome, and some of his more notable buildings include the College of Forestry Building at the University of Washington (determined eligible for the NRHP) and the Psychology Building at Central Washington College. Therefore, the Auditorium at the Park of the Pines is not eligible for the NRHP under Criterion C. The building employs standard construction techniques; the material and construction methods do not convey important information that could contribute to understanding history or prehistory. The building is not eligible under Criterion D for information potential.

Historic Inventory Report

Although all of the buildings on the property appear to be associated with the Park of the Pines conference center, they do not comprise an eligible historic district. With the exception of the auditorium, the buildings on the site were not built to serve the conference center, but rather are a loose collection of residential and accessory buildings that pre-date the formation of the conference center. They are not united by any visible plan, do not appear to share any significant historic context, and are unremarkable architecturally. Therefore they are not eligible for the NRHP either individually or as a historic district.

Description of
Physical
Appearance:

The Park of the Pines conference center/auditorium building was built in 1969 by Reverend Duff, who had purchased the property in 1963. The architect of record was Harvey R. Dodd and Associates, which was a structural engineering firm that also employed architects. Reverend Duff served as his own contractor. The style of the building is unadorned and utilitarian, and resembles a quonset hut from the outside. The building is set back a considerable distance from the road and positioned at the bottom of a small hill, obscuring the auditorium's visibility from the public right-of-way. The building covers 10,860 square feet. It has an essentially rectangular footprint with a smaller rectangular section on the rear (east) elevation, and two small projections that wrap around the northwest and southwest corners of the building's front elevation. The building is concrete block construction on a poured concrete foundation. The roof over the main portion of the building is a wide, shallow arch clad in built up composition with open eaves on the side elevations. The shape of the shell roof is formed by three arched wooden beams that extend beyond the side walls and terminate at the ground, where they are bolted with steel plates to large concrete piers that are set into the ground at an angle. These arched beams are the prominent elements on the exterior of the building. Where the beams pierce the exterior walls, they are supported on braced wooden frames bolted to concrete block piers which sit on poured concrete footers. The beams are exposed wood on the interior, but on the exterior they are sheathed in metal and concrete. This roof structure allows for a clear span on the interior, so the large auditorium space is unmarred by support columns and the arched wooden ceiling is devoid of trusses. The front extensions off of the main section of the auditorium have shallow shed roofs of asphalt/composition with exposed rafter tails in the open eaves. A shed roof also stretches across the front (west) elevation, between the two end extensions, supported by wooden posts. The rear extension, which houses the stage area, has a shallow shed roof with flush eaves. The semi-circular area formed by the roof above the concrete block walls is clad in vertical plywood siding, as are the areas between the shed roofs and the concrete block walls. On the front elevation, the center section of the space under the semi-circular area is also clad in the same vertical plywood siding, which reaches down below the shed roof to the ground. The rest of the front elevation is painted concrete block. The front elevation of the main building contains three double pedestrian doors which are each topped with splayed wooden lintels. The southern set of doors appears to be the original paneled wood doors. The two northern entrances are replacement metal doors.

The two front extensions of the building each contain a replacement swinging door that leads onto the covered front entry area. These doors access the men's and women's restrooms. Each of the two extensions has three windows - two on the side and one on the rear. On the south extension, the windows are all original three-over-six light windows with concrete sills. On the north extension, only the rear window retains the three-over-six window; the two on the side elevation have been replaced with three-light aluminum sash with obscured glass panes. While there are two small vents on the north and south elevations of the main section of the building, there are no windows. The rear (east) elevation extension also lacks windows, but contains a pedestrian door on the north and south elevations, which both lead backstage of the auditorium's stage area.

Historic Inventory Report

The auditorium's interior is cavernous and unadorned, with concrete floors except for thin carpeting along the aisles. The main seating area is located in the central area of the building, with four sections of curved rows of theater seats that face east. The raised stage area is located in the section that extends from the building's east elevation. The metal and wood theater seats are quite ornate and appear to have come from an earlier building. They are the most decorative element of the space with striped green upholstery, carved wooden arm rests, and cast metal panels with ornamental designs on the end of each row. Some of the decorative metal elements on the seats have remnants of green and red paint, indicating that the metal was at one time colorful. The walls of the interior space throughout the auditorium are painted concrete block. The barrel vaulted ceiling is clad in light wood slats that run east-west. The three wood arched support beams are stained dark and perpendicularly cross the wooden slat ceiling. Bare ceiling lights run the length of the ceiling, adjacent to the arched beams. Thick acoustic wall panels have been secured to all three of the interior walls that surround the seating. The wooden stage is raised approximately three feet off the ground and is carpeted. A large, curved white scrim supported by a wooden frame forms the backdrop. Smaller wood panels flank the scrim and separate the wings from the main performance area. The stage contains some seating, a piano, organ chimes, and a pulpit constructed from wood slats similar to those on the ceiling. The pulpit bears a cross and the words "Jesus Paid It All." Small wing areas on either side of the stage contain some seating and a water fountain. The wings can be accessed by an interior pedestrian door on the south side of the stage. The ceiling above the stage is lower than that of the seating area and is clad in wooden slats crossed by wooden joists. A thick wooden lintel forms a strong horizontal border across the top of the stage opening.

A rectangular plan accessory building known as the Pine Cone is located on the Park of the Pines property northwest of the auditorium. Built on a poured concrete foundation, the simple wood frame building is used by conference attendees for social gatherings after events in the auditorium and during holidays. Constructed in 1961, the building is clad in vertical wood siding and has a side gabled roof with shallow, open eaves covered in composite shingles. The main entrance is located on the west elevation and is shaded by a small attached overhang. A small replacement, two-light horizontal sliding window is located on the south elevation along with a small, metal louvered attic vent. Under the vent, a wood sign that reads "Pine Cone" is attached to the exterior wall. There are no windows or doors on the east elevation. The Park of the Pines auditorium and its accessory building, the Pine Cone, are largely intact, with their original footprints and many original materials. Minor cosmetic changes have been made to the auditorium's exterior and interior; early photographs of the auditorium featured on the conference center's website show that the exterior concrete block was painted red at one time and that the carpeting on the stage has been replaced. Otherwise, the utilitarian and unadorned design remains largely unchanged.

Historic Inventory Report

Major
Bibliographic
References:

Ancestry.com. Haldane Duff in the 1940 Census. http://www.ancestry.com/1940-census/usa/Oregon/Haldane-Duff_252mlk. Accessed January 2, 2013.

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Find the Company. 2013. Park of the Pines Church in Kent, WA. <http://companies.findthecompany.com/I/11648236/Park-Of-The-Pines-Church-in-Kent-WA>. Accessed January 2, 2013.

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The Kaleah Commonwealth Online. 2007. "Obituary: Olive Huddleston 1908-2007." <http://www.kawahcommonwealth.com/02-16-07features.htm>. Accessed January 18, 2013.

Village Missions. 2013. The Founding of the Mission. <http://www.village-missions.org/about/history-founding.php>. Accessed January 2, 2013.

Photos



Southwest corner.
2013



West elevation.
2013



Front entrance area under shed roofed overhang.
View to the north.
2013



South elevation.
2013

Historic Inventory Report



North elevation.
2013



Rear rectangular section (protrudes from east elevation).
Southeast corner.
2013



Auditorium interior (view to the southeast).
2013



Auditorium interior (view to the northeast).
2013



Ceiling.
2013

Auditorium seats.
2013



Southeast corner, Pine Cone accessory building
2013

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Historic Inventory Report

Location

Field Site No. 1629-121 DAHP No.

Historic Name: Highline Community College Biology Building

Common Name: Highline Community College -- Building 12

Property Address: 2400 S 240th St, Des Moines, WA 98198

Comments:

Tax No./Parcel No. 1622049016

Plat/Block/Lot

Acreage 39.42

Supplemental Map(s)

Township/Range/EW	Section	1/4 Sec	1/4 1/4 Sec	County	Quadrangle
T22R04E	16			King	DES MOINES

Coordinate Reference

Easting: 1194842

Northing: 754766

Projection: Washington State Plane South

Datum: HARN (feet)

Identification

Survey Name: Sound Transit Federal Way Date Recorded: 01/14/2014

Field Recorder: MaryNell Nolan-Wheatley

Owner's Name: HIGHLINE COMMUNITY COLLEGE

Owner Address: PO BOX 98000

City: Des Moines State: WA Zip: 98198

Classification: Building

Resource Status: Comments:

Survey/Inventory

Within a District? No

Contributing? No

National Register:

Local District:

National Register District/Thematic Nomination Name:

Eligibility Status: Not Determined - SHPO

Determination Date: 1/1/0001

Determination Comments:



Historic Inventory Report

Description

Historic Use: Education - College
Plan: Rectangle Stories: 1
Changes to Plan: Slight
Changes to Original Cladding: Intact
Changes to Other: Slight
Current Use: Education - College
Structural System: Concrete - Reinforced Concrete
Changes to Interior: Unknown
Changes to Windows: Slight
Other (specify): One original pedestrian door has been replaced with an aggregate concrete panel.
Style: Cladding: Roof Type: Roof Material:
Modern Concrete Flat with Parapet Asphalt / Composition -
 Veneer - Marblecrete Flat with Eaves Built Up
Foundation: Form/Type:
Concrete - Poured Other

Narrative

Study Unit	Other
Architecture/Landscape Architecture	
Date of Construction:	1964 Built Date
	Builder:
	Engineer:
	Architect: Ralph H. Burkhard

Property appears to meet criteria for the National Register of Historic Places: Yes

Property is located in a potential historic district (National and/or local): Yes

Property potentially contributes to a historic district (National and/or local): Yes

Statement of Significance: The city of Des Moines is located approximately halfway between Seattle and Tacoma, on the eastern side of Puget Sound (Des Moines Historical Society, 2007). The town started as a logging community and as a real estate venture of F. A. Blasher, who moved from Des Moines, Iowa, to King County in 1888 (Des Moines Historical Society, 2007; Lange, 1998). After World War I, Des Moines' popularity rose when the town expanded its dock and ferry service, attracting increased numbers of summer vacationers. The population grew quickly after World War II and Des Moines was incorporated as a city in 1959 (Des Moines Historical Society, 2007). While some buildings in Des Moines date to the 1920s and 1930s, many commercial and residential buildings were constructed during a period of suburban development in the 1950s and 1960s. On January 31, 1967, Interstate 5 (I-5), which passed through Des Moines on the route from Everett to Tacoma, Washington, was completed and established another transportation route, in addition to Pacific Highway S (SR 99), for commuters in the area (Des Moines Historical Society, 2007).

Historic Inventory Report

Highline Community College (HCC) was founded in 1961, but spent its first three years on the campus of Glacier High School. An 80-acre site for HCC in the current location west of Pacific Highway South in Des Moines was procured, and groundbreaking ceremonies were held on August 12, 1963 (McMannon, 2012). Ralph Burkhard (1908-1993), who was known for his educational buildings and unusual techniques, was the architect. Burkhard had already received a Seattle American Institute of Architects (AIA) Honor Award for Southgate Elementary School and a National Honor Award for Foster Junior-Senior High School, both in Seattle (Docomomo WEWA, 2012). His unusual techniques included the first major use of triangular glue-laminated beams on the West Coast (at Mountlake Terrace High School, 1960); a corrugated, thin-shell roof at Kenmore Elementary School (circa 1955); and cable-suspended walls and roof plates for buildings at Central Washington University (circa 1964) (Docomomo WEWA, 2012).

He continued his innovative designs at HCC. His plan called for 30 buildings constructed in two phases. Construction of the first phase, which included 16 buildings, occurred from 1963 to 1965. These buildings were concentrated along a curved path on what is currently the eastern edge of the campus and were steel-reinforced concrete construction with Chewelah marble aggregate cladding. Although completion of the campus was intended for fall 1964, a few of the buildings were not completed until 1965, after the school year had already started (McMannon, 2012). Despite this, on January 31, 1965, the campus was dedicated with 2,800 people in attendance (McMannon, 2012).

In 1966, the American Association of School Administrators gave the campus an award for exceptional design. Summer of that same year, construction started on the second phase of construction, which included 10 new buildings. According to HCC history instructor, Timothy McMannon, "When classes started in fall 1967, all of the buildings were completed [except for the Instructional Guidance Center and Performing Arts Center]...The new construction added 103,00 square feet of building space to the existing 145,000 and more than doubled the number of classrooms and faculty offices" (2012). Most of the buildings from these two phases of construction are still extant. The HCC campus contains six buildings that have been previously determined eligible for the NRHP for their architectural significance (Buildings 4, 5, 6, 11, 19, and 28) (DAHP, 2012; DAHP, 2013). In addition, the core of the original HCC campus, including many of the original buildings, may contribute to a potential historic district.

Building 12, which currently serves as the Life Sciences classroom building, was constructed in 1964 during the first phase of campus construction. The building is eligible for listing in the NRHP under Criterion C, for its architectural significance as an example of 1960s era tilt-up construction with exposed aggregate concrete exteriors. This method of construction enabled builders to use concrete in order to produce the structural elements of a building on the project site, decreasing cost and labor time. Walls and other supports were cast horizontally and then raised (or "tilted") to their permanent upright position. Building 12 has been altered several times, including the replacement of some original doors and windows. As a result, the building has lost some integrity of material, although it retains integrity of location, design, setting, workmanship, feeling, and association. Since the building embodies the distinctive characteristics of a type, period, and method of construction and also retains enough integrity to convey that significance, Building 12 is eligible for listing in the NRHP. The building may also contribute to a potential historic district that includes the remaining original buildings from the first two phases of construction.

Historic Inventory Report

Description of
Physical
Appearance:

Building 12 on HCC's campus, which currently serves as the Life Sciences classroom building, is located along the eastern edge of the campus adjacent to the east parking lot and sits on a concrete slab foundation. Built in 1964, the one-story rectangular plan building was part of the first phase of campus construction and is clad in concrete exterior walls with Chewelah marble aggregate. The steel-reinforced concrete building has a flat built-up roof encased in low parapets on the side (east and west) elevations with deep concrete eave overhangs over the main (north and south) elevations. Large, prominent concrete rafter tails are exposed under the eaves, emphasizing the building's weighty feel. Smooth, vertical concrete support beams protrude slightly from the main elevations and line up with the horizontal rafters. Individual classrooms are accessible through several exterior pedestrian doors on the north and south elevations. The vertical support beams and the exposed rafter tails visually divide the main facades into a row of rectangular sections, most of which contain a group of windows or a pedestrian door placed next to a window.

The west end of the north elevation contains three metal pedestrian doors separated by several sections of the elevation that contain windows. A fixed, single-light window is positioned next to each door, and four, single-light transom windows are positioned above the door and its adjacent window. One of the transom windows over the far west door is an operable awning window, although all of the others appear to be fixed. There are four sections with windows between the west door and the center door, and three sections of windows between the center door and the east door. Between the doors, each section of the elevation (separated by the vertical support beams) contains a pair of adjacent tall, fixed, rectangular, single-light windows placed beneath a pair of smaller, fixed, single-light windows. Three of the seven window sections on the north elevation contain a small, operable awning window within the tall, fixed, single-light window. The east end of the north elevation contains a single, metal pedestrian door that appears to be a service entrance. The south elevation of the building is nearly a mirror image of the north elevation, although the windows and doors are concentrated on the east side of the elevation and the central pedestrian door has been replaced with a panel of aggregate concrete cladding, to match the rest of the exterior wall. Additionally, several of the transom windows have been replaced with metal louvered vents. There are no windows or doors on the east and west elevations, although a metal rectangular louvered vent is located on the north end of the east elevation. A large metal ventilation and utilities system has been attached to the south end of the east elevation and is surrounded by a chain link fence.

Concrete sidewalks run along the north and south elevations of Building 12 and some flowerbeds with shrubbery are positioned in front of the windows. A small garden, with a sign labeling it as a "Washington Native Habitat Garden" is located on the west side of the building. Metal utility pipes extend from the roof of the north elevation and connect with Building 13, which is adjacent to the east end of Building 12. Building 14 is located north of Building 12 and is very similar in appearance.



Historic Inventory Report

Major Bibliographic References:

Department of Archaeology and Historic Preservation (DAHP). 2012. Highline Community College Building 4. Historic Property Inventory Report. Washington Information System for Architectural and Archaeological Records Data (WISAARD). Available at: <https://fortress.wa.gov/dahp/wisaard/>. Accessed January 14, 2014.

Department of Archaeology and Historic Preservation (DAHP). 2013. Highline Community College Building 6 and 19. Historic Property Inventory Report. Washington Information System for Architectural and Archaeological Records Data (WISAARD). Available at: <https://fortress.wa.gov/dahp/wisaard/>. Accessed January 14, 2014.

Des Moines Historical Society. 2007. Time Line Page. Available at: <http://www.dmhs.org/timeline/history.html>. Accessed January 14, 2014.

Docomomo WEWA. 2013. Burkhard, Ralph H. Available at: http://www.docomomo-wewa.org/architects_detail.php?id=80. Accessed January 14, 2014.

Lange, G. 1998. Des Moines Beginnings: Des Moines Post Office opens on August 6, 1889. HistoryLink: The Free Online Encyclopedia of Washington State History. Available at: http://www.historylink.org/index.cfm?DisplayPage=output.cfm&file_id=500. Accessed January 14, 2014.

McMannon, T.H. 2012. Our Award-Winning Campus (Buildings!): Construction in the 1960s and '70s. Highline Community College 50th Anniversary Celebration 2011-2012. Vignette No. 2. Available at: <http://50th.highline.edu/docs/OurAward-WinningCampus.pdf>. Accessed January 14, 2014.

Photos



Northwest corner
2014



South elevation, view to the northwest
2014



Northeast corner
2014



West elevation
2014



Historic Inventory Report

Location

Field Site No. 1629-121 DAHP No.

Historic Name: Highline Community College - Building 13

Common Name: Highline Community College - Building 13

Property Address: 2400 S 240th St, Des Moines, WA 98198

Comments:

Tax No./Parcel No. 1622049016

Plat/Block/Lot

Acreage 39.42

Supplemental Map(s)

Township/Range/EW	Section	1/4 Sec	1/4 1/4 Sec	County	Quadrangle
T22R04E	16			King	DES MOINES

Coordinate Reference

Easting: 1194909

Northing: 754860

Projection: Washington State Plane South

Datum: HARN (feet)

Identification

Survey Name: Sound Transit Federal Way Date Recorded: 01/14/2014

Field Recorder: MaryNell Nolan-Wheatley

Owner's Name: HIGHLINE COMMUNITY COLLEGE

Owner Address: PO BOX 98000

City: Des Moines State: WA Zip: 98198

Classification: Building

Resource Status: Comments:

Survey/Inventory

Within a District? No

Contributing? No

National Register:

Local District:

National Register District/Thematic Nomination Name:

Eligibility Status: Not Determined - SHPO

Determination Date: 1/1/0001

Determination Comments:



Historic Inventory Report

Description

Historic Use: Education - College
Plan: T-Shape Stories: 1
Changes to Plan: Intact
Changes to Original Cladding: Intact
Changes to Other: Slight
Other (specify): Some original doors have been replaced with corrugated metal plates.
Style: Modern
Cladding: Concrete Veneer - Marblecrete
Roof Type: Flat with Parapet Flat with Eaves
Roof Material: Asphalt / Composition - Built Up
Foundation: Concrete - Poured
Form/Type: Other

Narrative

Study Unit
Architecture/Landscape Architecture
Date of Construction: 1964 Built Date
Builder:
Engineer:
Architect: Ralph H. Burkhard

Property appears to meet criteria for the National Register of Historic Places: Yes

Property is located in a potential historic district (National and/or local): Yes

Property potentially contributes to a historic district (National and/or local): Yes

Statement of Significance: The city of Des Moines is located approximately halfway between Seattle and Tacoma, on the eastern side of Puget Sound (Des Moines Historical Society, 2007). The town started as a logging community and as a real estate venture of F. A. Blasher, who moved from Des Moines, Iowa, to King County in 1888 (Des Moines Historical Society, 2007; Lange, 1998). After World War I, Des Moines' popularity rose when the town expanded its dock and ferry service, attracting increased numbers of summer vacationers. The population grew quickly after World War II and Des Moines was incorporated as a city in 1959 (Des Moines Historical Society, 2007). While some buildings in Des Moines date to the 1920s and 1930s, many commercial and residential buildings were constructed during a period of suburban development in the 1950s and 1960s. On January 31, 1967, Interstate 5 (I-5), which passed through Des Moines on the route from Everett to Tacoma, Washington, was completed and established another transportation route, in addition to Pacific Highway S (SR 99), for commuters in the area (Des Moines Historical Society, 2007).

Historic Inventory Report

Highline Community College (HCC) was founded in 1961, but spent its first three years on the campus of Glacier High School. An 80-acre site for HCC in the current location west of Pacific Highway South in Des Moines was procured, and groundbreaking ceremonies were held on August 12, 1963 (McMannon, 2012). Ralph Burkhard (1908-1993), who was known for his educational buildings and unusual techniques, was the architect. Burkhard had already received a Seattle American Institute of Architects (AIA) Honor Award for Southgate Elementary School and a National Honor Award for Foster Junior-Senior High School, both in Seattle (Docomomo WEWA, 2012). His unusual techniques included the first major use of triangular glue-laminated beams on the West Coast (at Mountlake Terrace High School, 1960); a corrugated, thin-shell roof Kenmore Elementary School (circa 1955); and cable-suspended walls and roof plates for buildings at Central Washington University (circa 1964) (Docomomo WEWA, 2012).

He continued his innovative designs at HCC. His plan called for 30 buildings constructed in two phases. Construction of the first phase, which included 16 buildings, occurred from 1963 to 1965. These buildings were concentrated along a curved path on what is currently the eastern edge of the campus and were steel-reinforced concrete construction with Chewelah marble aggregate cladding. Although completion of the campus was intended for fall 1964, a few of the buildings were not completed until 1965, after the school year had already started (McMannon, 2012). Despite this, on January 31, 1965, the campus was dedicated with 2,800 people in attendance (McMannon, 2012).

In 1966, the American Association of School Administrators gave the campus an award for exceptional design. Summer of that same year, construction started on the second phase of construction, which included 10 new buildings. According to HCC history instructor, Timothy McMannon, "When classes started in fall 1967, all of the buildings were completed [except for the Instructional Guidance Center and Performing Arts Center]...The new construction added 103,00 square feet of building space to the existing 145,000 and more than doubled the number of classrooms and faculty offices" (2012). Most of the buildings from these two phases of construction are still extant. The HCC campus contains six buildings that have been previously determined eligible for the NRHP for their architectural significance (Buildings 4, 5, 6, 11, 19, and 28) (DAHP, 2012; DAHP, 2013). In addition, the core of the original HCC campus, including many of the original buildings, may contribute to a potential historic district.

Building 13, which currently serves as a classroom building, was constructed in 1964 during the first phase of campus construction. The building is eligible for listing in the NRHP under Criterion C, for its architectural significance as an example of 1960s era tilt-up construction with exposed aggregate concrete exteriors. This method of construction enabled builders to use concrete in order to produce the structural elements of a building on the project site, decreasing cost and labor time. Walls and other supports were cast horizontally and then raised (or "tilted") to their permanent upright position. Building 13 has been altered several times, including the replacement of some original doors. As a result, the building has lost some integrity of materials. Overall, however, Building 13 retains integrity of location, design, setting, workmanship, feeling, and association. Since the building embodies the distinctive characteristics of a type, period, and method of construction and also retains enough integrity to convey that significance, Building 13 is eligible for listing in the NRHP. The building may also contribute to a potential historic district that includes the remaining original buildings from the first two phases of construction.

Historic Inventory Report

Description of
Physical
Appearance:

Building 13 on HCC's campus, which currently serves as a classroom building, is located along the eastern edge of the campus, adjacent to the east parking lot, and sits on a concrete slab foundation. Built in 1964, the one-story, essentially T-shaped building was part of the first phase of campus construction and is clad in concrete exterior walls with Chewelah marble aggregate. The steel-reinforced concrete building has a flat built-up roof that extends into deep concrete eave overhangs over the north, south, and west elevations and has a low, rectangular parapet on the rear (east) elevation (the top of the T). Large, prominent concrete rafter tails are exposed under the north and south elevation's eaves. Between each rafter tail, the concrete underside of the overhang forms a very shallow, upside down V shape, which is repeated along the building's primary (north and south) elevations, creating a zigzag effect along the edge of the overhang. The pattern terminates on the west end of the building with only half of the V shape, forming a concrete overhang that slants upwards and shades the west elevation.

Two metal pedestrian doors with rectangular, aluminum kick guards are located on the west elevation (bottom of the T) and mark the locations of a male and a female bathroom. There is a two-light horizontal sliding window just west of center of the north elevation on the longer section of the T shape. Large, metal air conditioning vents extend out from the exterior wall, above the sliding window and below the eaves. Three metal doors are located west of the window and two are located east of the window on the north elevation. Due to a change in grade of the land, the door on the east end of the north elevation is higher than the other three doors, requiring a concrete ramp with a metal pipe handrail for access. A vending machine is located on the west end of the elevation. The north end of the top of the T shape projects from the east end of the north elevation. The west elevation of this north projection contains a large, rectangular, corrugated metal plate that has replaced an original pedestrian door. The north elevation of the projection contains two metal pedestrian doors, both of which are accessible by concrete steps because of the increase in grade of the land towards the east side of the building. A two-light, horizontal sliding window is located in the center of the south elevation, on the longer section of the T shape. A large, air conditioning vent projects from the elevation, above the sliding window and just beneath the eave. Two large, corrugated metal panels have replaced original pedestrian doors located west of the window, and a metal pedestrian door is located east of the window. The south end of the top of the T shape projects from the east end of the south elevation. The west elevation of this south projection contains a single, metal pedestrian door. The south elevation of this protruding section contains another metal pedestrian door. Two large, two-light horizontal sliding windows are located in the center of the rear elevation. Two more identical windows are located on the north and south ends of the same elevation.

Building 13 is mainly surrounded by pavement and some grass along the east elevation. Metal utility pipes connect the building to Building 14 to the north and Building 12 to the south. A circular patio area with concrete benches and some landscaping is located to the west of Building 13.



Historic Inventory Report

Major Bibliographic References:

Department of Archaeology and Historic Preservation (DAHP). 2012. Highline Community College Building 4. Historic Property Inventory Report. Washington Information System for Architectural and Archaeological Records Data (WISAARD). Available at: <https://fortress.wa.gov/dahp/wisaard/>. Accessed January 14, 2014.

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McMannon, T.H. 2012. Our Award-Winning Campus (Buildings!): Construction in the 1960s and '70s. Highline Community College 50th Anniversary Celebration 2011-2012. Vignette No. 2. Available at: <http://50th.highline.edu/docs/OurAward-WinningCampus.pdf>. Accessed January 14, 2014.

Photos



West elevation
2014



Southwest corner
2014



Northeast corner
2014



North elevation
2014



Southeast corner
2014

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Historic Inventory Report

Location

Field Site No. 1629-121 DAHP No.

Historic Name: Highline Community College - Building 14

Common Name: Highline Community College - Building 14

Property Address: 2400 S 240th St, Des Moines, WA 98198

Comments:

Tax No./Parcel No. 1622049016

Plat/Block/Lot

Acreage 39.42

Supplemental Map(s)

Township/Range/EW	Section	1/4 Sec	1/4 1/4 Sec	County	Quadrangle
T22R04E	16			King	DES MOINES

Coordinate Reference

Easting: 1194825

Northing: 754886

Projection: Washington State Plane South

Datum: HARN (feet)

Identification

Survey Name: Sound Transit Federal Way Date Recorded: 01/14/2014

Field Recorder: MaryNell Nolan-Wheatley

Owner's Name: HIGHLINE COMMUNITY COLLEGE

Owner Address: PO BOX 98000

City: DES MOINES State: WA Zip: 98198

Classification: Building

Resource Status: Comments:

Survey/Inventory

Within a District? No

Contributing? No

National Register:

Local District:

National Register District/Thematic Nomination Name:

Eligibility Status: Not Determined - SHPO

Determination Date: 1/1/0001

Determination Comments:



Historic Inventory Report

Description

Historic Use: Education - College	Current Use: Education - College		
Plan: Rectangle	Stories: 1		
Changes to Plan: Intact	Structural System: Concrete - Reinforced Concrete		
Changes to Original Cladding: Slight	Changes to Interior: Unknown		
Changes to Other:	Changes to Windows: Moderate		
Other (specify):			
Style:	Cladding:	Roof Type:	Roof Material:
Modern	Concrete	Flat with Parapet	Asphalt / Composition -
	Veneer - Marblecrete	Flat with Eaves	Built Up
Foundation:	Form/Type:		
Concrete - Poured	Other		

Narrative

Study Unit	Other
Architecture/Landscape Architecture	
Date of Construction:	1964 Built Date
	Builder:
	Engineer:
	Architect: Ralph H. Burkhard

Property appears to meet criteria for the National Register of Historic Places: Yes

Property is located in a potential historic district (National and/or local): Yes

Property potentially contributes to a historic district (National and/or local): Yes

Statement of Significance: The city of Des Moines is located approximately halfway between Seattle and Tacoma, on the eastern side of Puget Sound (Des Moines Historical Society, 2007). The town started as a logging community and as a real estate venture of F. A. Blasher, who moved from Des Moines, Iowa, to King County in 1888 (Des Moines Historical Society, 2007; Lange, 1998). After World War I, Des Moines' popularity rose when the town expanded its dock and ferry service, attracting increased numbers of summer vacationers. The population grew quickly after World War II and Des Moines was incorporated as a city in 1959 (Des Moines Historical Society, 2007). While some buildings in Des Moines date to the 1920s and 1930s, many commercial and residential buildings were constructed during a period of suburban development in the 1950s and 1960s. On January 31, 1967, Interstate 5 (I-5), which passed through Des Moines on the route from Everett to Tacoma, Washington, was completed and established another transportation route, in addition to Pacific Highway S (SR 99), for commuters in the area (Des Moines Historical Society, 2007).

Historic Inventory Report

Highline Community College (HCC) was founded in 1961, but spent its first three years on the campus of Glacier High School. An 80-acre site for HCC in the current location west of Pacific Highway South in Des Moines was procured, and groundbreaking ceremonies were held on August 12, 1963 (McMannon, 2012). Ralph Burkhard (1908-1993), who was known for his educational buildings and unusual techniques, was the architect. Burkhard had already received a Seattle American Institute of Architects (AIA) Honor Award for Southgate Elementary School and a National Honor Award for Foster Junior-Senior High School, both in Seattle (Docomomo WEWA, 2012). His unusual techniques included the first major use of triangular glue-laminated beams on the West Coast (at Mountlake Terrace High School, 1960); a corrugated, thin-shell roof Kenmore Elementary School (circa 1955); and cable-suspended walls and roof plates for buildings at Central Washington University (circa 1964) (Docomomo WEWA, 2012).

He continued his innovative designs at HCC. His plan called for 30 buildings constructed in two phases. Construction of the first phase, which included 16 buildings, occurred from 1963 to 1965. These buildings were concentrated along a curved path on what is currently the eastern edge of the campus and were steel-reinforced concrete construction with Chewelah marble aggregate cladding. Although completion of the campus was intended for fall 1964, a few of the buildings were not completed until 1965, after the school year had already started (McMannon, 2012). Despite this, on January 31, 1965, the campus was dedicated with 2,800 people in attendance (McMannon, 2012).

In 1966, the American Association of School Administrators gave the campus an award for exceptional design. Summer of that same year, construction started on the second phase of construction, which included 10 new buildings. According to HCC history instructor, Timothy McMannon, "When classes started in fall 1967, all of the buildings were completed [except for the Instructional Guidance Center and Performing Arts Center]...The new construction added 103,00 square feet of building space to the existing 145,000 and more than doubled the number of classrooms and faculty offices" (2012). Most of the buildings from these two phases of construction are still extant. The HCC campus contains six buildings that have been previously determined eligible for the NRHP for their architectural significance (Buildings 4, 5, 6, 11, 19, and 28) (DAHP, 2012; DAHP, 2013). In addition, the core of the original HCC campus, including many of the original buildings, may contribute to a potential historic district.

Building 14, which currently serves as the Physical Sciences classroom building, was constructed in 1964 during the first phase of campus construction. The building is eligible for listing in the NRHP under Criterion C, for its architectural significance as an example of 1960s era tilt-up construction with exposed aggregate concrete exteriors. This method of construction enabled builders to use concrete in order to produce the structural elements of a building on the project site, decreasing cost and labor time. Walls and other supports were cast horizontally and then raised (or "tilted") to their permanent upright position. Several alterations have been made to Building 14, including the replacement of some original windows and siding. As a result, it has lost some integrity of materials. The building, however, retains integrity of location, design, setting, workmanship, feeling, and association. Since the building embodies the distinctive characteristics of a type, period, and method of construction and also retains enough integrity to convey that significance, Building 14 is eligible for listing in the NRHP. The building may also contribute to a potential historic district that includes the remaining original buildings from the first two phases of construction.

Historic Inventory Report

Description of
Physical
Appearance:

Building 14 on HCC's campus, which currently serves as the Physical Sciences classroom building, is located along the eastern edge of the campus adjacent to the east parking lot and sits on a concrete slab foundation. Built in 1964, the one-story rectangular plan building was part of the first phase of campus construction and is clad in concrete exterior walls with Chewelah marble aggregate. The steel-reinforced concrete building has a flat built-up roof with low parapets on the side (east and west) elevations and deep concrete eave overhangs over the main (north and south) elevations. Large, prominent concrete rafter tails are exposed under the eaves, emphasizing the building's heavy feel. Smooth, vertical concrete support beams protrude slightly from the main elevations and line up with the horizontal rafters. Individual classrooms are accessible through several exterior pedestrian doors on the north and south elevations. The vertical support beams and the exposed rafter tails visually divide the main facades into a row of rectangular sections, each of which contains either a large, two-light horizontal sliding window or a metal pedestrian door with an adjacent, fixed, single-light window. Several of the large, two-light sliding windows have been replaced with a pair of large, fixed, single-light windows. Along the top of the north and south elevation's exterior walls, a pair of fixed, single-light windows is located between each exposed rafter tail, just under the eave, although some of these have been replaced with metal louvered vents. All of the windows have metal frames and some appear to be double glazed.

The north elevation contains four metal pedestrian doors separated by several sections of the elevation that contain windows. A fixed, single-light window is positioned next to each door. Separating the pedestrian classroom doors are either three or four sections (separated by the vertical support beams) of the elevation that each contain either a large, two-light horizontal sliding window or a pair of fixed, single-light windows. The east end of the north elevation contains a single, metal pedestrian door with an adjacent fixed, single-light window accessible by a concrete ramp with a metal pipe handrail that appears to be a service entrance. The south elevation of the building is nearly a mirror image of the north elevation, although several panels of the aggregate concrete siding under the windows have been replaced with opaque composite panels.

There are no windows on the east or west elevations, although the east elevation does contain two rectangular, metal, louvered vents. Air conditioning units are located adjacent to the east elevation and are surrounded by a chain link fence. Concrete sidewalks run along the north and south elevations of Building 14 and some flowerbeds with shrubbery are positioned in front of the windows. A circular patio is also located in front of the south façade. Metal utility pipes extend from the roof of the south elevation and connect with Building 13, which is adjacent to the east end of Building 14. Building 12 is located south of Building 14 and is very similar in appearance.

Historic Inventory Report

Major
Bibliographic
References:

Department of Archaeology and Historic Preservation (DAHP). 2012. Highline Community College Building 4. Historic Property Inventory Report. Washington Information System for Architectural and Archaeological Records Data (WISAARD). Available at: <https://fortress.wa.gov/dahp/wisaard/>. Accessed January 14, 2014.

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Photos



Northwest corner
2014



Northeast corner
2014



North elevation
2014



Southeast corner
2014

Historic Inventory Report



Southwest corner
2014



South elevation
2014

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Historic Inventory Report

Location

Field Site No. 1629-121 DAHP No.

Historic Name: Highline Community College Faculty Offices

Common Name: Highline Community College -- Building 15

Property Address: 2400 S 240th St, Des Moines, WA 98198

Comments:

Tax No./Parcel No. 1622049016

Plat/Block/Lot

Acreage 39.42

Supplemental Map(s)

Township/Range/EW	Section	1/4 Sec	1/4 1/4 Sec	County	Quadrangle
T22R04E	16			King	DES MOINES

Coordinate Reference

Easting: 1194775

Northing: 754940

Projection: Washington State Plane South

Datum: HARN (feet)

Identification

Survey Name: Sound Transit Federal Way Date Recorded: 01/15/2014

Field Recorder: MaryNell Nolan-Wheatley

Owner's Name: HIGHLINE COMMUNITY COLLEGE

Owner Address: PO BOX 98000

City: DES MOINES State: WA Zip: 98198

Classification: Building

Resource Status: Comments:

Survey/Inventory

Within a District? No

Contributing?

National Register:

Local District:

National Register District/Thematic Nomination Name:

Eligibility Status: Not Determined - SHPO

Determination Date: 1/1/0001

Determination Comments:



Historic Inventory Report

Description

Historic Use: Education - College	Current Use: Education - College		
Plan: Irregular	Stories: 2		
Changes to Plan: Intact	Structural System: Concrete - Reinforced Concrete		
Changes to Original Cladding: Intact	Changes to Interior: Unknown		
Changes to Other:	Changes to Windows: Intact		
Other (specify):			
Style:	Cladding:	Roof Type:	Roof Material:
Modern	Concrete	Gable - Gable-on-Hip	Metal - Corrugated
	Veneer - Marblecrete		
Foundation:	Form/Type:		
Concrete - Poured	Other		

Narrative

Study Unit	Other	
Architecture/Landscape Architecture		
Date of Construction:	1967 Built Date	Builder:
		Engineer:
		Architect: Ralph H. Burkhard

Property appears to meet criteria for the National Register of Historic Places: Yes

Property is located in a potential historic district (National and/or local): Yes

Property potentially contributes to a historic district (National and/or local): Yes

Statement of Significance: The city of Des Moines is located approximately halfway between Seattle and Tacoma, on the eastern side of Puget Sound (Des Moines Historical Society, 2007). The town started as a logging community and as a real estate venture of F. A. Blasher, who moved from Des Moines, Iowa, to King County in 1888 (Des Moines Historical Society, 2007; Lange, 1998). After World War I, Des Moines' popularity rose when the town expanded its dock and ferry service, attracting increased numbers of summer vacationers. The population grew quickly after World War II and Des Moines was incorporated as a city in 1959 (Des Moines Historical Society, 2007). While some buildings in Des Moines date to the 1920s and 1930s, many commercial and residential buildings were constructed during a period of suburban development in the 1950s and 1960s. On January 31, 1967, Interstate 5 (I-5), which passed through Des Moines on the route from Everett to Tacoma, Washington, was completed and established another transportation route, in addition to Pacific Highway S (SR 99), for commuters in the area (Des Moines Historical Society, 2007).

Historic Inventory Report

Highline Community College (HCC) was founded in 1961, but spent its first three years on the campus of Glacier High School. An 80-acre site for HCC in the current location west of Pacific Highway South in Des Moines was procured, and groundbreaking ceremonies were held on August 12, 1963 (McMannon, 2012). Ralph Burkhard (1908-1993), who was known for his educational buildings and unusual techniques, was the architect. Burkhard had already received a Seattle American Institute of Architects (AIA) Honor Award for Southgate Elementary School and a National Honor Award for Foster Junior-Senior High School, both in Seattle (Docomomo WEWA, 2012). His unusual techniques included the first major use of triangular glue-laminated beams on the West Coast (at Mountlake Terrace High School, 1960); a corrugated, thin-shell roof Kenmore Elementary School (circa 1955); and cable-suspended walls and roof plates for buildings at Central Washington University (circa 1964) (Docomomo WEWA, 2012).

He continued his innovative designs at HCC. His plan called for 30 buildings constructed in two phases. Construction of the first phase, which included 16 buildings, occurred from 1963 to 1965. These buildings were concentrated along a curved path on what is currently the eastern edge of the campus and were steel-reinforced concrete construction with Chewelah marble aggregate cladding. Although completion of the campus was intended for fall 1964, a few of the buildings were not completed until 1965, after the school year had already started (McMannon, 2012). Despite this, on January 31, 1965, the campus was dedicated with 2,800 people in attendance (McMannon, 2012).

In 1966, the American Association of School Administrators gave the campus an award for exceptional design. Summer of that same year, construction started on the second phase of construction, which included 10 new buildings. According to HCC history instructor, Timothy McMannon, "When classes started in fall 1967, all of the buildings were completed [except for the Instructional Guidance Center and Performing Arts Center]...The new construction added 103,00 square feet of building space to the existing 145,000 and more than doubled the number of classrooms and faculty offices" (2012). Most of the buildings from these two phases of construction are still extant. The HCC campus contains six buildings that have been previously determined eligible for the NRHP for their architectural significance (Buildings 4, 5, 6, 11, 19, and 28) (DAHP, 2012; DAHP, 2013). In addition, the core of the original HCC campus, including many of the original buildings, may contribute to a potential historic district.

Building 15 was constructed in 1967 as a Faculty Office building during the second phase of campus construction. The building is eligible for listing in the NRHP under Criterion C, for its architectural significance as an example of 1960s era tilt-up construction with exposed aggregate concrete exteriors. This method of construction enabled builders to use concrete in order to produce the structural elements of a building on the project site, decreasing cost and labor time. Walls and other supports were cast horizontally and then raised (or "tilted") to their permanent upright position. Building 15's exterior appearance remains largely unchanged. As a result, the building retains integrity of location, design, setting, materials, workmanship, feeling, and association. Since the building embodies the distinctive characteristics of a type, period, and method of construction and also retains enough integrity to convey that significance, Building 15 is eligible for listing in the NRHP. The building may also contribute to a potential historic district that includes the remaining original buildings from the first two phases of construction.

Historic Inventory Report

Description of Physical Appearance:

Building 15 on HCC's campus, which currently serves as a Faculty Office building, is located along the eastern edge of the campus adjacent to the east parking lot and sits on a concrete slab foundation. Built in 1967, the two-story irregular plan building was part of the second phase of campus construction and is clad in concrete exterior walls with Chewelah marble aggregate. The steel-reinforced concrete building has a low-pitch, corrugated metal, gable-on-hip roof. Aerial images indicate that a rectangular sunroof is located at the gabled roof's ridge board.

A metal and glass pedestrian door is located north of the center of the front (west) elevation. Two large, fixed, single-light windows are located south of the main door and one is located north of the main door. A small awning window is located within the top of the window directly south of the door. An attached flat roof overhang projects from the ground floor level of the front elevation and shades the main entrance. The concrete overhang is supported by two narrow, rectangular reinforced concrete pillars. Directly above the overhang, on the second floor of the main façade, there are two, large, fixed, single-light windows placed below smaller, single-light awning windows. This pair of windows is flanked on either side by larger, fixed, single-light windows. There are two, long, vertical window openings on the south elevation that contain two windows each: a window on the ground floor and a window on the second floor. The two levels of windows are separated by a smooth panel of concrete that is slightly recessed from the rest of the elevation. Each of the four windows is a fixed, rectangular, single-light window placed below a smaller, single-light awning window. There are no windows or doors on the east elevation. West of center on the north elevation, a two-story, rectangular section of the building projects out and is covered by an extension of the primary hipped roof. The west and east elevations of the projection contain a large window opening that extends from the ground to second floor and is filled by black glass blocks. On both sides of the protruding section of the building there is a metal pedestrian door located on the far west and east sides of the north elevation of the main building. Above each door is a smooth, recessed concrete panel and a fixed, single-light window placed below a single-light awning window.

Small flower beds are located along the four main elevations of Building 15. A large, paved sidewalk leads to the building's main door and connects with the primary walkway that passes through the east side of the campus.

Major Bibliographic References:

Department of Archaeology and Historic Preservation (DAHP). 2012. Highline Community College Building 4. Historic Property Inventory Report. Washington Information System for Architectural and Archaeological Records Data (WISAARD). Available at: <https://fortress.wa.gov/dahp/wisaard/>. Accessed January 14, 2014.

Department of Archaeology and Historic Preservation (DAHP). 2013. Highline Community College Building 6 and 19. Historic Property Inventory Report. Washington Information System for Architectural and Archaeological Records Data (WISAARD). Available at: <https://fortress.wa.gov/dahp/wisaard/>. Accessed January 14, 2014.

Des Moines Historical Society. 2007. Time Line Page. Available at: <http://www.dmhs.org/timeline/history.html>. Accessed January 14, 2014.

Docomomo WEWA. 2013. Burkhard, Ralph H. Available at: http://www.docomomo-wewa.org/architects_detail.php?id=80. Accessed January 14, 2014.

Lange, G. 1998. Des Moines Beginnings: Des Moines Post Office opens on August 6, 1889. HistoryLink: The Free Online Encyclopedia of Washington State History. Available at:

http://www.historylink.org/index.cfm?DisplayPage=output.cfm&file_id=500. Accessed January 14, 2014.

McMannon, T.H. 2012. Our Award-Winning Campus (Buildings!): Construction in the 1960s and '70s.

Highline Community College 50th Anniversary Celebration 2011-2012. Vignette No. 2. Available at: <http://50th.highline.edu/docs/OurAward-WinningCampus.pdf>. Accessed January 14, 2014.

Photos



Northwest corner
2014



Northeast corner
2014



Southwest corner
2014



Southeast corner
2014



View to the west, glass block detail
2014



Historic Inventory Report

Location

Field Site No. 1629-121 DAHP No.
Historic Name: Highline Community College - Vocational and Technical buildings
Common Name: Highline Community College - Building 16
Property Address: 2400 S 240th St, Des Moines, WA 98198
Comments:
Tax No./Parcel No. 1622049016
Plat/Block/Lot
Acreage 39.42
Supplemental Map(s)

Township/Range/EW	Section	1/4 Sec	1/4 1/4 Sec	County	Quadrangle
T22R04E	16			King	DES MOINES

Coordinate Reference

Easting: 1194912
Northing: 755099
Projection: Washington State Plane South
Datum: HARN (feet)

Identification

Survey Name: Sound Transit Federal Way Date Recorded: 01/15/2014
Field Recorder: MaryNell Nolan-Wheatley
Owner's Name: HIGHLINE COMMUNITY COLLEGE
Owner Address: PO BOX 98000
City: DES MOINES State: WA Zip: 98198
Classification: Building
Resource Status: Comments:
Survey/Inventory
Within a District? No
Contributing? No
National Register:
Local District:
National Register District/Thematic Nomination Name:
Eligibility Status: Not Determined - SHPO
Determination Date: 1/1/0001
Determination Comments:



Historic Inventory Report

Description

Historic Use: Education - College	Current Use: Education - College		
Plan: L-Shape	Stories: 1		
Changes to Plan: Moderate	Structural System: Concrete - Reinforced Concrete		
Changes to Original Cladding: Intact	Changes to Interior: Unknown		
Changes to Other:	Changes to Windows: Intact		
Other (specify):			
Style:	Cladding:	Roof Type:	Roof Material:
Modern	Concrete	Flat with Parapet	Asphalt / Composition -
	Veneer - Marblecrete	Flat with Eaves	Built Up
Foundation:	Form/Type:		
Concrete - Poured	Other		

Narrative

Study Unit	Other
Architecture/Landscape Architecture	
Date of Construction:	1967 Built Date
	Builder:
	Engineer:
	Architect: Ralph H. Burkhard

Property appears to meet criteria for the National Register of Historic Places: Yes

Property is located in a potential historic district (National and/or local): Yes

Property potentially contributes to a historic district (National and/or local): Yes

Statement of Significance: The city of Des Moines is located approximately halfway between Seattle and Tacoma, on the eastern side of Puget Sound (Des Moines Historical Society, 2007). The town started as a logging community and as a real estate venture of F. A. Blasher, who moved from Des Moines, Iowa, to King County in 1888 (Des Moines Historical Society, 2007; Lange, 1998). After World War I, Des Moines' popularity rose when the town expanded its dock and ferry service, attracting increased numbers of summer vacationers. The population grew quickly after World War II and Des Moines was incorporated as a city in 1959 (Des Moines Historical Society, 2007). While some buildings in Des Moines date to the 1920s and 1930s, many commercial and residential buildings were constructed during a period of suburban development in the 1950s and 1960s. On January 31, 1967, Interstate 5 (I-5), which passed through Des Moines on the route from Everett to Tacoma, Washington, was completed and established another transportation route, in addition to Pacific Highway S (SR 99), for commuters in the area (Des Moines Historical Society, 2007).

Historic Inventory Report

Highline Community College (HCC) was founded in 1961, but spent its first three years on the campus of Glacier High School. An 80-acre site for HCC in the current location west of Pacific Highway South in Des Moines was procured, and groundbreaking ceremonies were held on August 12, 1963 (McMannon, 2012). Ralph Burkhard (1908-1993), who was known for his educational buildings and unusual techniques, was the architect. Burkhard had already received a Seattle American Institute of Architects (AIA) Honor Award for Southgate Elementary School and a National Honor Award for Foster Junior-Senior High School, both in Seattle (Docomomo WEWA, 2012). His unusual techniques included the first major use of triangular glue-laminated beams on the West Coast (at Mountlake Terrace High School, 1960); a corrugated, thin-shell roof Kenmore Elementary School (circa 1955); and cable-suspended walls and roof plates for buildings at Central Washington University (circa 1964) (Docomomo WEWA, 2012).

He continued his innovative designs at HCC. His plan called for 30 buildings constructed in two phases. Construction of the first phase, which included 16 buildings, occurred from 1963 to 1965. These buildings were concentrated along a curved path on what is currently the eastern edge of the campus and were steel-reinforced concrete construction with Chewelah marble aggregate cladding. Although completion of the campus was intended for fall 1964, a few of the buildings were not completed until 1965, after the school year had already started (McMannon, 2012). Despite this, on January 31, 1965, the campus was dedicated with 2,800 people in attendance (McMannon, 2012).

In 1966, the American Association of School Administrators gave the campus an award for exceptional design. Summer of that same year, construction started on the second phase of construction, which included 10 new buildings. According to HCC history instructor, Timothy McMannon, "When classes started in fall 1967, all of the buildings were completed [except for the Instructional Guidance Center and Performing Arts Center]...The new construction added 103,00 square feet of building space to the existing 145,000 and more than doubled the number of classrooms and faculty offices" (2012). Most of the buildings from these two phases of construction are still extant. The HCC campus contains six buildings that have been previously determined eligible for the NRHP for their architectural significance (Buildings 4, 5, 6, 11, 19, and 28) (DAHP, 2012; DAHP, 2013). In addition, the core of the original HCC campus, including many of the original buildings, may contribute to a potential historic district.

Building 16, which currently serves as the Engineering Lab, Print Technology, and Visual Communications building, was constructed in 1967 during the second phase of campus construction. The building is eligible for listing in the NRHP under Criterion C, for its architectural significance as an example of 1960s era tilt-up construction with exposed aggregate concrete exteriors. This method of construction enabled builders to use concrete in order to produce the structural elements of a building on the project site, decreasing cost and labor time. Walls and other supports were cast horizontally and then raised (or "tilted") to their permanent upright position. Originally, the building was constructed as two separate buildings: the Vocational Building and the Technical Building. Additions to the buildings connected them, forming one, large, L-shaped plan building. Additionally, several other alterations have been made to Building 16, including the replacement of some original windows. As a result, Building 16 has lost some integrity of materials and design. The building, however, retains integrity of location, setting, workmanship, feeling, and association. Since the building embodies the distinctive characteristics of a type, period, and method of construction and also retains enough integrity to convey that significance, Building 16 is eligible for listing in the NRHP. The building may also contribute to a potential historic district that includes the remaining original buildings from the first two phases of construction.

Description of
Physical
Appearance:

Historic Inventory Report

Building 16 on HCC's campus, which currently serves as the Engineering Lab, Print Technology, and Visual Communications building, is located in the northeastern corner of the campus adjacent to the east parking lot and sits on a concrete slab foundation. Built in 1967, the one-story, essentially L-shaped building was part of the second phase of campus construction and is clad in concrete exterior walls with Chewelah marble aggregate. The building is composed of a south, rectangular plan wing and a west, rectangular plan wing. The west wing has a slightly higher roof height than the south wing. A later addition wraps around the northeast corner of the building, making the L-shape slightly irregular. The steel-reinforced concrete building has a flat built-up roof that extends into deep concrete eave overhangs over the main elevations (north and south elevations on the west wing; east and west elevations on the south wing), with low, rectangular parapets on the side elevations (west elevation on the west wing; south elevation on the south wing). Large, prominent concrete rafter tails are exposed under the eaves, emphasizing a general feel of weightiness to the building. Smooth, vertical concrete support beams protrude from the main elevations and line up with the horizontal rafters. The vertical support beams and the exposed rafter tails visually divide the main facades into a row of rectangular sections. Between each rafter tail, the concrete underside of the overhang forms a very shallow, upside down V shape, which is repeated along the building's primary elevations, creating a zigzag effect along the edge of the overhang. The south elevation of the west wing and the west elevation of the south wing face a large, grassy, courtyard area with concrete benches and picnic tables. Concrete sidewalks run along these elevations and are covered by a flat roof, concrete awning that is lower than the roof height of the building. The awning is supported by large, concrete, cylindrical columns clad in aggregate concrete siding, to match the main building.

The west elevation of the south wing contains three metal pedestrian doors. Between each door, each section of the façade (divided by the protruding concrete supports) contains large, two-light, metal frame windows. Double metal and glass pedestrian doors are located on the far south end of the west elevation. The south elevation of the west wing contains a single, metal pedestrian door with a narrow, fixed single-light rectangular window. Several large, two-light horizontal sliding windows are located on the rear (east) elevation of the south wing.

A metal pedestrian door is located near the center of the south elevation of the west wing and is positioned adjacent to a long, vertically oriented, two-light fixed window. Most exterior wall sections of the south elevation of the west wing (divided by the protruding concrete support posts) contain four, fixed, single-light windows with a small, single-light awning window in the lower right hand corner. As a group, the four windows (which encompass the smaller awning window) form a large rectangular window. Just under the eaves, between each of the exposed rafter tails, there is a pair of fixed, single-light windows or a pair of metal louvered vents. Several vending machines are located along the south elevation. The elevation also contains several large rectangular, louvered metal vents. The west end of the west wing contains two metal pedestrian doors and no window openings. The north elevation of the west wing appears very similar to the south elevation, with the deep eave overhang and the exposed rafter tails. The north elevation, however, contains a large vehicle bay with a metal retractable door on the west end, which is likely used to load equipment into the laboratories. The sections of the north elevation's exterior walls that contain windows have a group of four, fixed single-light windows that form one large rectangle. Several small concrete block utility sheds have also been added to the north elevation. Several, smaller, rectangular plan additions wrap around the northeast corner of the building. Two such buildings, which are clad in corrugated metal and have shed roofs, are visible projecting from the north elevation of the west wing. Both of these additions contain a large vehicle bay with a retractable door on their west elevations. Aerial images also indicate that there are several skylights on the northeast corner of the building. The property is surrounded by grass and some pavement.

Historic Inventory Report

Major
Bibliographic
References:

Department of Archaeology and Historic Preservation (DAHP). 2012. Highline Community College Building 4. Historic Property Inventory Report. Washington Information System for Architectural and Archaeological Records Data (WISAARD). Available at: <https://fortress.wa.gov/dahp/wisaard/>. Accessed January 14, 2014.

Department of Archaeology and Historic Preservation (DAHP). 2013. Highline Community College Building 6 and 19. Historic Property Inventory Report. Washington Information System for Architectural and Archaeological Records Data (WISAARD). Available at: <https://fortress.wa.gov/dahp/wisaard/>. Accessed January 14, 2014.

Des Moines Historical Society. 2007. Time Line Page. Available at: <http://www.dmhs.org/timeline/history.html>. Accessed January 14, 2014.

Docomomo WEWA. 2013. Burkhard, Ralph H. Available at: http://www.docomomo-wewa.org/architects_detail.php?id=80. Accessed January 14, 2014.

Lange, G. 1998. Des Moines Beginnings: Des Moines Post Office opens on August 6, 1889. HistoryLink: The Free Online Encyclopedia of Washington State History. Available at: http://www.historylink.org/index.cfm?DisplayPage=output.cfm&file_id=500. Accessed January 14, 2014.

McMannon, T.H. 2012. Our Award-Winning Campus (Buildings!): Construction in the 1960s and '70s. Highline Community College 50th Anniversary Celebration 2011-2012. Vignette No. 2. Available at: <http://50th.highline.edu/docs/OurAward-WinningCampus.pdf>. Accessed January 14, 2014.

Photos



Showing central courtyard
View to the northeast
2014



Southwest corner, west wing
2014



West elevation, south wing
2014



Northeast additions visible on left side of photo
View east, in rear of building
2014

Historic Inventory Report



East elevation
2014



South elevation, west wing
2014



Southwest corner, south wing
2014

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Historic Inventory Report

Location

Field Site No. 7499-293 DAHP No.

Historic Name: Calvary Lutheran Church

Common Name: Calvary Lutheran Church

Property Address: 2415 S 320th St, Federal Way, WA 98003

Comments:

Tax No./Parcel No. 7978200525

Plat/Block/Lot Lot 54-55

Acreage 4.43

Supplemental Map(s)

Township/Range/EW	Section	1/4 Sec	1/4 1/4 Sec	County	Quadrangle
T21R04E	16			King	POVERTY BAY

Coordinate Reference

Easting: 1193485

Northing: 727664

Projection: Washington State Plane South

Datum: HARN (feet)

Identification

Survey Name: Sound Transit Federal Way Date Recorded: 01/13/2014

Field Recorder: MaryNell Nolan-Wheatley

Owner's Name: CALVARY EVANGELICAL LUTHERAN

Owner Address: 2415 S 320TH ST

City: Federal Way State: WA Zip: 98003

Classification: Building

Resource Status: Comments:

Survey/Inventory

Within a District? No

Contributing? No

National Register:

Local District:

National Register District/Thematic Nomination Name:

Eligibility Status: Not Determined - SHPO

Determination Date: 1/1/0001

Determination Comments:



Historic Inventory Report

Description

Historic Use: Religion - Religious Facility

Current Use: Religion - Religious Facility

Plan: Irregular Stories: 2

Structural System: Platform Frame

Changes to Plan: Moderate

Changes to Interior: Unknown

Changes to Original Cladding: Slight

Changes to Windows: Moderate

Changes to Other:

Other (specify):

Style:

Cladding:

Roof Type:

Roof Material:

Modern - Neo-
Expressionism

Veneer - Brick
Concrete - Block
Veneer

Mansard
Hip - Bellcast Hip
Gable - Front Gable
Flat with Eaves

Asphalt / Composition -
Shingle
Asphalt / Composition -
Built Up

Foundation:

Form/Type:

Concrete - Poured

Church

Narrative

Study Unit

Other

Architecture/Landscape Architecture

Date of Construction: 1956 Built Date
1967 Addition
1981 Addition
1992 Addition
2003 Addition
2010 Remodel
2012 Remodel

Builder:

Engineer:

Architect: Steinhart, Theriault & Anderson

Property appears to meet criteria for the National Register of Historic Places: Yes

Property is located in a potential historic district (National and/or local): No

Property potentially contributes to a historic district (National and/or local): No

Statement of
Significance:

Historic Inventory Report

Construction of the original Highway 1 in the state of Washington commenced in 1913. By October 1923, 700 miles of a two-lane highway had been completed connecting Vancouver, British Columbia, to the Oregon-California border. Just after the highway was completed in 1924, however, plans were begun to reroute and improve the conditions of the highway. The project involved creating a new, wider, four-lane route further west that would connect Seattle and Tacoma, Washington, more directly (Kramak, 2010). The new roadway was completed in 1928 and acquired the title of Highway 1, while the original eastern route was renamed Highway 5 (Caster, 2007). The new Highway 1 became known as the Pacific Highway. Over the years, various parts of Highway 1 acquired alternative names, including the portion known as Pacific Highway S, which starts near Federal Way, Washington, and continues north, through Kent, Des Moines, and SeaTac, Washington (Kramak, 2010).

In 1926, Pacific Highway (HWY 1) was included as a numbered U.S. Highway (US 99) (U.S. Route 99, 2013). The following decades witnessed the rapid growth of businesses along the highway and the formation of a new auto-oriented roadside culture characterized by a proliferation of motels, restaurants, and rest stops (Des Moines Historical Society, 2007). Increased automobile ownership changed people's perceptions about distance and allowed populations to sprawl around urban centers, increasing the number of residents in suburban towns and cities, including SeaTac, Des Moines, Kent, and Federal Way (Boyles, 2010).

Federal Way was originally settled as a rural logging community in the late 1800s. In 1928, when the Pacific Highway (HWY 1/US 99) between Tacoma and Seattle opened, it linked Federal Way to the larger neighboring communities, spurring economic and residential development. The name Federal Way came from an eponymous school built in 1929 on Pacific Highway S (Caster, 2007). During the 1950s, Federal Way witnessed substantial growth, transforming from a small lumber town into a metropolitan area. Auto-oriented businesses emerged and thrived along the Pacific Highway. Community growth was bolstered by Boeing and Weyerhaeuser industries in the 1960s. In 1968, Weyerhaeuser purchased 430 acres of land for its corporate headquarters, which opened in April 1971 (Caster, 2007). Federal Way was incorporated as a city in 1990.

The first service and organizational meeting of Federal Way's Calvary Lutheran Church was held in a rented space on November 28, 1954, with Edward Flatness designated as the lay pastor. The new congregation, which included 113 charter members, temporarily used the Lutherland Bible Camp's chapel and eventually chose Reverend Luther William Youndahl in 1955 to serve as the first pastor (Harris, 2012; Calvary Lutheran Church of Federal Way, 2014). Within the year, church members bought 10 acres of land along Peasley Canyon Road (now South 320th Street), just off Pacific Hwy, in order to build a new church facility (Harris, 2012). The original, two-story, rectangular plan church with a front gabled roof was constructed in 1956 and the first service was held on September 16 of that year, three months before the building's dedication on December 9. In 1957, an office and Sunday school addition, funded by a donation from the Immanuel Luther church in Dunnell, Minnesota, was built and dedicated (Calvary Lutheran Church of Federal Way, 2014).

Historic Inventory Report

Nearly ten years later, on August 28, 1966, construction started on a new sanctuary and adult education unit, completed in June 1967 (Calvary Lutheran Church of Federal Way, 2014). The new sanctuary was designed by Robert D. Theriault of the local Seattle firm, Steinhart, Theriault & Anderson. Theriault, a native of Tacoma, Washington, attended the University of Washington after serving in World War II and joined Steinhart & Stanley in 1952, making partner just three years later. The prolific firm was known for their church, school, and community building designs in the south Seattle region. While most of their projects were collaborative, Theriault is generally remembered as the mastermind behind their conceptual design work (Docomomo WEWA, 2014). By 1969, the congregation included 631 confirmed members and 1,068 baptized members (Harris, 2012). Over the next decades, several changes to the property occurred. The rear section of the property was sold to the State of Washington in 1978 for use as a Park & Ride lot in order to pay off the mortgage (Calvary Lutheran Church of Federal Way, 2014). In 1981 several structural alterations were made to the main buildings: the education wing was remodeled, a Tracker pipe organ was installed, the parking lot was paved, and the entrance area across from the main altar (narthex) was expanded in order to connect the two buildings (Harris, 2012; Calvary Lutheran Church of Federal Way, 2014). A groundbreaking ceremony was held on June 7, 1992 for the construction of new church offices, which were subsequently dedicated on March 28. A new accessory building attached to the northwest corner of the building was completed in 2003 and the building's interior was remodeled in 2010 and 2012. The 2012 remodel included the addition of interior partition walls to enlarge and reconfigure four existing restrooms and install new plumbing fixtures (King County Department of Assessments, 2013).

Currently, the Calvary Lutheran Church serves as a designated Red Cross Disaster facility and maintains a mission to invite, inspire, equip, and engage the community. The church hosts weekly religious services, youth and adult education programs, as well as community service and outreach programs in the Federal Way facility (Calvary Lutheran Church of Federal Way, 2014).

The Calvary Lutheran Church at 2415 South 320th Street in Federal Way, Washington is eligible for listing in the NRHP under Criterion C for its architectural significance. The 1967 sanctuary is a good example of the Neo-Expressionist architectural style with its exaggerated, tall hipped roof and flared eaves (DAHP, 2009). The Neo-Expressionist style was popular during the mid-twentieth century and was used primarily for religious and public buildings. Certain construction methods and materials, including stucco, brick veneer, and concrete were used to form unusual, asymmetrical curves and sculptural building elements that defined the architectural style. These dramatic designs attempted to communicate meaning through the onlooker's emotional response rather than through a traditionally accepted lexicon of symbols (Recent Past Revealed, 2014). The property has undergone several additions and renovations that have mainly affected the integrity of the 1954 building, particularly its integrity of materials, workmanship, and design. The main sanctuary, however, retains integrity of location, design, setting, materials, workmanship, feeling and association. Therefore, the building is eligible for listing in the NRHP under Criterion C for its architectural significance and retains enough integrity to demonstrate that significance.

Description of
Physical
Appearance:

Historic Inventory Report

First established in 1954, the Calvary Lutheran Church is composed of the original church, now a classroom building, constructed in 1956, and a larger sanctuary constructed in 1967 (King County Department of Assessments, 2013; Calvary Lutheran Church of Federal Way, 2014). These two main sections of the building are connected by an enclosed corridor that runs east to west. A two-story 2003 addition wraps around the northwest corner of the 1956 building, obstructing the front view of the original church. The building has an irregular plan and sits on a 4.43 acres property in Federal Way (DAHP, 2009; King County Department of Assessments, 2013). The building is wood construction with a poured concrete foundation. The original building, constructed in 1956, had a rectangular plan and a front gabled roof covered in composite shingles. Although the building appeared to be one story from the street, a full, finished, raised basement level was accessible from the side (west) and rear (south) elevations due to a change in grade of the land, making the building essentially two stories. The front (north) elevation was clad in brick veneer while the side and rear elevations were clad in a combination of concrete blocks and vertical wood siding. A large, abstract, wood frame rectangular structure was attached to the front façade, and rose up high above the roof. The lower half of the structure was clad in wood siding. A tall, simple, wood cross extended from the northeast corner of the structure, while two small crosses were incorporated into the upper half of the wood frame. This cross structure has since been removed. An attached, lower height, flat, built-up roof overhang projected from the front façade, east of the cross structure, and shaded the main entrance. An extended, full length, flat roof section of the building projected from the east elevation and contained in large letters the words “Calvary Lutheran Church” on the north elevation, east of the main entrance. Ribbon windows ran along the west elevation, just beneath the ceiling height of each of the floors. The two levels of windows were separated by a large panel of vertical wood siding, while the ends of the west elevation were clad in concrete block. Today, this original building is largely obscured by the 1967 sanctuary addition and several subsequent additions to the east elevation and northwest corner of the building.

Adjacent to the now hidden original building, on the east side, is the large 11,680-square foot sanctuary constructed in 1967. The Neo-Expressionist, wood frame building designed by Steinhart, Theriault & Anderson has an exaggerated, tall hipped roof with flared eaves, typical of the architectural style. The roof is covered in composite shingles. A triangular shape stained glass window has been placed at an angle to the north face of the hipped roof, creating the illusion of a steeple that has been cut off at a sharp angle. This abstract, leaded, stained glass window functions as a skylight, illuminating the interior of the sanctuary. A large, plain cross has been affixed to the north face of the hipped roof. The roof extends south over the rear of the essentially rectangular plan 1967 section of the building, becoming an exaggerated mansard roof. The building is primarily clad in brick veneer, although the exterior walls are dwarfed by the dramatic roof. There are no visible windows on the north elevation of the main sanctuary. The east elevation contains four, tall narrow, bay windows with only two faces, forming a point that is covered in wood. The bays extend from the ground to the just beneath the eaves and contain tall panes of pebbled glass and a narrow, horizontal strip of stained glass three-fourths of the way up. Two brick support posts project from the east elevation, south of these windows, and are located adjacent to double glass doors that serve as a side entrance. The rear (south end) of the 1967 building, which is covered with the composite shingle mansard roof and was remodeled in 1981, contains two stories (Harris, 2012). The east elevation of this rear section is clad in horizontal wood siding that is not original. A second floor entrance with a pedestrian door, accessible by a straight flight of metal stairs, extends from the south end of the east elevation’s mansard roof. A pair of double metal and glass doors and row of windows are located on the ground floor of the south elevation. Three shed dormers with two-light horizontal sliding windows project from the south elevation’s mansard roof. Along the west elevation of the 1967 sanctuary is a rectangular plan section of the building covered by a flat roof that extends from the primary mansard roof. The west elevation contains two long window openings just under the eaves that each contain a combination of fixed, single-light windows and one-over-one metal sash windows. The north end of the west elevation contains a large, fixed, single-light metal window and a wood pedestrian door with a fixed, single-light rectangular window.

Historic Inventory Report

North of this doorway, a two-story addition with a flat, built-up roof serves as a corridor and was built in 1981. It extends from the center of the sanctuary's west elevation and connects to the south end of the original building's east elevation. The exterior walls of the corridor are clad in brick veneer on the north elevation and painted stucco on the south elevation. A row of five, fixed, single-light windows, each of which is adjacent to a small, awning window placed above a fixed, single-light rectangular window, runs along the south elevation of the corridor's second floor. There are no visible windows on the ground floor. On the south side of the corridor, where it meets the exterior walls of the sanctuary, is a recessed entrance area with two sets of double metal doors painted red. This entrance is shaded by the overhang of the flat roof that curves at this point of intersection to cover both the west elevation of the sanctuary and the connecting corridor addition. The side (west) and rear (south) elevations of the original building, covered by a gabled roof, are visible just west of the two-story corridor addition. The west elevation's second story windows have been replaced by larger, two-light horizontal sliding windows and the vertical wood siding has been replaced by what appears to be panels of T1-11 siding. An attached awning has been added over a replacement metal pedestrian door located in the center of the west elevation's ground floor.

A large, two-story platform frame addition that was constructed in 2003 wraps around the northwest corner of the original building and has a low-pitch hipped roof covered in composite shingles with deep eave overhangs. The addition has an irregular plan and is clad in a combination of horizontal composite siding and large panels of wood board and batten. All of the corners of the new construction building are chamfered and the primary entrances are located on the west elevation. A two-plane bay projects from the center of the west elevation, vaguely mirroring the original windows on the east elevation of the sanctuary, and contains two sets of double metal and glass doors on the ground floor. A plain metal pedestrian door is located south of these entrances and a two-light window opening is located to the north. The second floor of the west elevation contains two fixed, single-light windows placed over awning windows on the central, two-plane bay. This bay is flanked by two-light horizontal sliding windows. The property in front of the church, on the north side, is neatly manicured with extensive landscaping that incorporates trees, bushes, park benches, and several concrete paths. A large paved parking lot wraps around the southwest corner of the building.

Historic Inventory Report

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Photos



North elevation
2014



Northeast corner
2014



Southeast corner
2014



Southwest corner
2014

Historic Inventory Report



2003 addition visible on left, west elevation of original 1956 building visible on right.

West elevation

2014



Northwest corner

2014



East elevation, window detail

2014

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

March 14, 2014

Mr. Steve Saxton
Federal Transit Administration
915 2nd Avenue
Federal Building, Suite 3142
Seattle, WA 98174-1002

In future correspondence please refer to:
Log: 102912-18-FTA
Property: Federal Way Link Transit Extension
Re: Determined of Eligibility – Phase 1

Dear Mr. Saxton:

Thank you for contacting our office. I have reviewed the materials you provided to our office for 10 properties within the APE for the Sound Transit Federal Way Link Extension. Our understanding is that additional HPIF (300+) will follow. After careful evaluation I have determined that the following properties are Eligible for the National Register of Historic Places.

Calvary Lutheran Church-	Eligible
King County Dist. 75 Water Tanks-	Eligible
Highline Community College: Biology Building -	Eligible
Highline Community College: Building 13 -	Eligible
Highline Community College: Building 14 -	Eligible
Highline Community College: Faculty Offices -	Eligible
Highline Community College: Voc & Tech Bldg -	Eligible

Note that we are still standing by our 2012 assessment that the King County District 75 Water Tanks are an eligible resource. This differs from the advice of Sound Transits consultant.

I have also determined that that the three resources at the Park of the Pines Camp are Not Eligible for listing on the National Register due to their low level of integrity.

Park of the Pines: Auditorium -	Not Eligible
Park of the Pines Residence A -	Not Eligible
Park of the Pines Residence B -	Not Eligible

I am a little unclear why these 10 properties were chosen for review, but keep in mind that there are adjacent historic resources to these properties which meet the 50 threshold for required survey. We look forward to seeing those in the next round of reviews.

I look forward to further consultation regarding your determination of effect to these eligible resources as plans for your project develop.



These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Houser', with a long horizontal flourish extending to the right.

Michael Houser
State Architectural Historian
(360) 586-3076
michael.houser@dahp.wa.gov





U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

April 2, 2014

Matthew Sterner
Transportation Archaeologist
Department of Archaeology and Historic Preservation
PO Box 148343
Olympia, WA 98504-8343

**Re: Sound Transit Federal Way Link Extension
Log No. 102912-18-FTA
Archaeological Survey Plan**

Dear Mr. Sterner:

Enclosed for your review is an archaeological survey plan for the Sound Transit Federal Way Link Extension (FWLE). The plan describes the proposed approach for archaeological investigations for the draft Environmental Impact Statement (EIS) and final EIS phases of the project. The plan has also been provided to tribes with a potential interest in the project area for review.

We look forward to your comments on the archaeological survey plan. If you have any questions or need further information, please feel free to contact Steve Saxton, FTA, at 206-220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at 206-395-5103 or kent.hale@soundtransit.org.

Sincerely,

Kenneth A. Feldman
Deputy Regional Administrator

Enclosures: Archaeological Survey Plan

cc: Kent Hale, Sound Transit

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Sound Transit Federal Way Link Extension

Research Design for Archaeological Fieldwork

Prepared by

Keith Mendez, M.A., CH2M HILL, Inc.

March 2014

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1.0 Introduction

The Federal Transit Authority (FTA) and Sound Transit have proposed the Federal Way Link Extension (FWLE) project to expand the Sound Transit Link light rail system from SeaTac to the cities of Des Moines, Kent, and Federal Way in King County. The proposed project would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. Sound Transit is preparing an environmental impact statement (EIS) in compliance with the National Environmental Policy Act and the Washington State Environmental Policy Act. The Draft EIS is expected to be published in late 2014 or early 2015. Following public and agency comments on the Draft EIS, the Sound Transit Board will identify a Preferred Alternative. The Final EIS will evaluate the Preferred Alternative further, and following publication of the Final EIS and issuance of the Record of Decision (ROD) by FTA, the Sound Transit Board will identify the project to be built. Final design and right-of-way acquisition will not occur until after the ROD and board decision.

Section 106 consultation was initiated with the Washington State Department of Archaeology and Historic Preservation (DAHP), the federally-recognized Muckleshoot, Puyallup, Snoqualmie, Stillaguamish, Suquamish, and Yakama tribes, and the non-federally recognized Duwamish and Snohomish tribes on June 13, 2013. DAHP concurred with the Area of Potential Effect (APE) notification on December 30, 2013. An archaeological survey will be employed to meet the reasonable and good faith effort identification requirements of Section 106 and the Washington State Standards for Cultural Resource Reporting. This document outlines the methodology that will be employed during this effort.

2.0 Project Location

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
Township 21 N, Range 4 E
Sections 4, 5, 8, 9, & 16
Township 22 N, Range 4 E
Sections 4, 9, 10, 15, 16, 21, 22, 28, 32, & 33

3.0 Research Design

The archaeological survey is intended to gather information in two phases about the historic and pre-contact archaeological record. The purpose of the research design is to provide a methodology for conducting the survey, inventory, data collection, and report preparation.

The Phase I field work will include a reconnaissance level survey of the footprint of the design alternatives, and subsurface testing of areas of interest to identify archaeological sites. Phase II field work would include additional archaeological excavation that might be needed to evaluate properties for inclusion in the National Register of Historic Places if any such properties are identified during Phase I.

Phase I will occur during preparation of the Draft EIS within public right-of-way and publicly owned parcels where access has been granted. For all other parcels (public and private), only the reconnaissance survey will be completed prior to the Draft EIS. Areas identified for a more intensive Phase I survey will be surveyed after the Preferred Alternative has been identified and before the Final EIS, where access can be obtained. If access to these parcels cannot be obtained prior to the Final EIS, the more intensive survey will occur during final design once the property has been acquired by Sound Transit. If areas requiring a Phase II survey are identified prior to the Final EIS, this survey will be completed and a determination of eligibility will be submitted to DAHP.

4.0 Preliminary Information

The APE has been defined to include all design alternatives to be included in the Draft EIS (Figure 1). Impervious surface data were received from King County and overlaid on the APE to identify all portions of the APE that contain impervious surfaces such as roads, parking lots, or buildings. This information was examined to identify portions of the APE that could be inspected for the presence of historic properties (Figure 2). Out of a total APE containing 1,261 acres, impervious surfaces account for 565 acres. The remaining 696 acres include parcels in public and private ownership. This investigation examines only those parcels in public ownership that are not identified as impervious, which account for approximately 187.37 acres.

5.0 Field Methodology

The Phase I fieldwork will include an archaeological survey consisting of background research of areas recently surveyed, review of the statewide predictive model provided by DAHP, a review of available geologic information from geotechnical borings and the Washington State Department of Natural Resources, and a reconnaissance level survey of portions of the APE that contain native sediments and have not been surveyed within the past 5 years. The reconnaissance survey will include inspecting portions of the APE to identify locations appropriate for further archaeological investigations, or Areas of Interest (AOIs).

Once AOIs are identified, an archaeological survey will be conducted in accordance with the guidelines provided by DAHP. Crew members will survey in parallel linear transects spaced no more than 30 meters (98 feet) apart. Any cultural materials identified will be documented and photographed. It is expected that where the ground is not covered in impermeable surfaces (asphalt, concrete, or compacted gravel), ground surfaces will be obscured by vegetation. At the discretion of the Project Archaeologist, locations will be identified where subsurface test units (STUs) may be employed to sample sediments in these areas. STUs will be excavated minimally to 60 centimeters (cm) (2 feet) below the ground surface or until obstructed. All sediments will be screened through a 0.6-cm (1/4-inch) wire mesh screen. If buried cultural materials are encountered in any STU, one STU will be excavated up to 4.5 meters (15 feet) away in each cardinal direction (north, south, east, and west) to establish site boundaries without intruding on impervious surfaces, or areas outside of the APE. Where access and site conditions allow, this method will be employed until two adjacent sterile STUs are encountered. Field documentation will include descriptions of the stratigraphic profile, soil type descriptions, and descriptions of any cultural

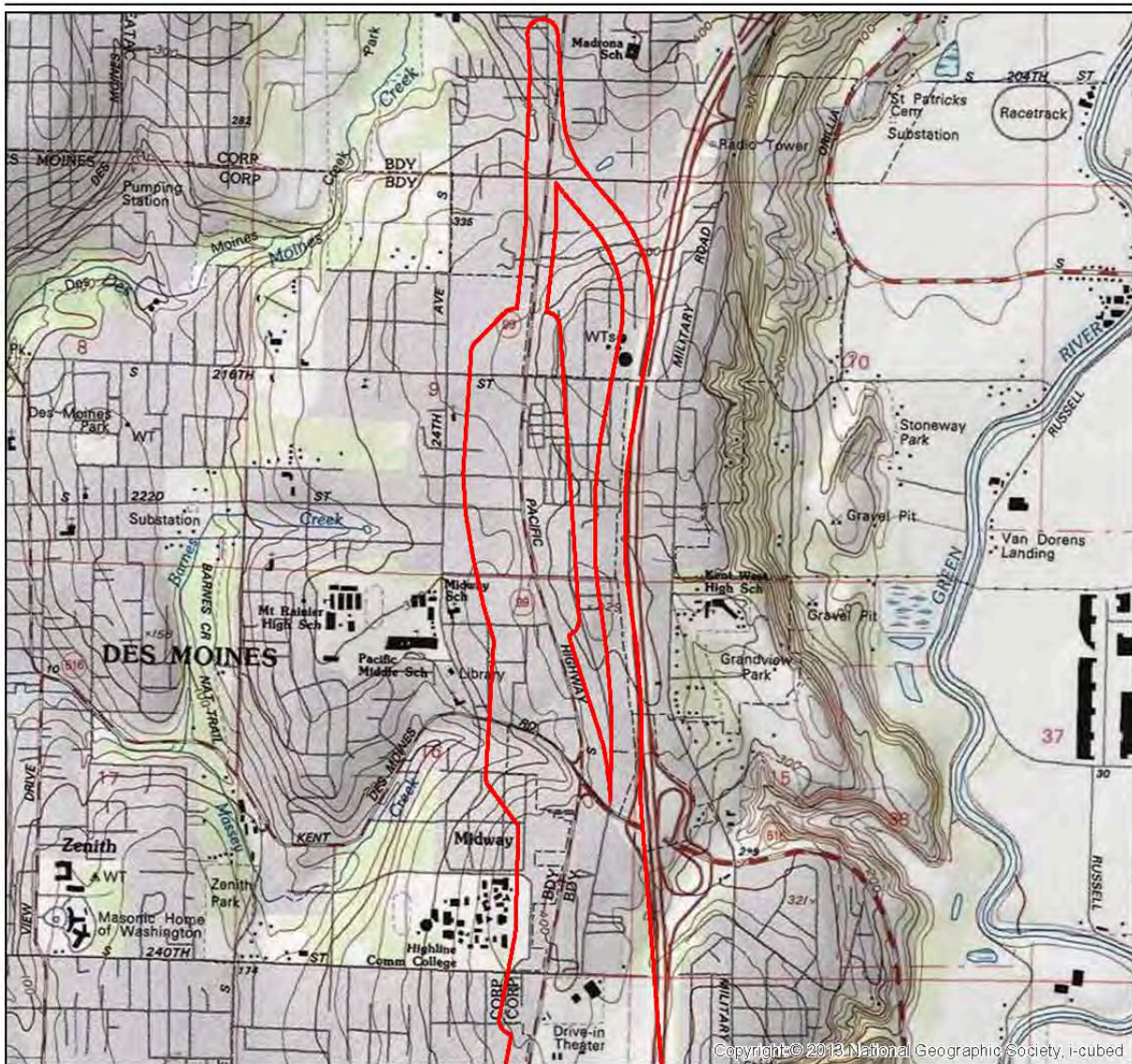
materials identified. Global Positioning System (GPS) coordinates and photographs will be collected for each STU. Any artifacts encountered will be analyzed, photographed, and recorded in the field, then reburied in the STU from which they originated. Collection of artifacts is not proposed for this phase of the study. An archaeologist will also review boring logs for any geotechnical borings during development of the Final EIS.

Once site boundaries have been established, the information gathered will be used to complete a Washington State Site or Isolate Inventory Form, as appropriate. Recommendations for site eligibility will be provided where possible, but this phase does not include formal Phase II evaluations that include completion of National Register Evaluation Forms. Per Washington State law (Revised Code of Washington 19.122 E2SHB 1634), it is assumed that utility locates will be conducted prior to the initiation of any subsurface archaeological testing. If no potentially eligible archaeological sites are discovered in the course of the survey, no additional fieldwork (Phase II) will be required. If potentially eligible archaeological sites are discovered, formal Phase II investigations may be recommended. Phase II investigations (evaluations) will be conducted once the Preferred Alternative is identified where potentially National Register eligible sites that cannot be avoided are discovered. A Phase II survey plan will be prepared if and when necessary.

6.0 Report

The results of the archaeological survey will be incorporated into the FWLE Historic and Archaeological Resources Technical Report completed for this undertaking. The results from Phase 1 on accessible properties will be incorporated into the version of this technical report released with the Draft EIS. The results from any additional properties where access will be gained between the Draft EIS and the Final EIS will be incorporated into the version of this technical report released with the Final EIS.

Archaeological sites and isolates, if encountered, will be documented and evaluated as needed to reach a finding of effect for the undertaking. Recommendations regarding the treatment of potentially eligible historic properties that may be identified will be included in the technical report. The technical report will be prepared meeting the Washington State Standards for Cultural Resource Reporting.



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33



0 0.25 0.5 0.75 1 mi

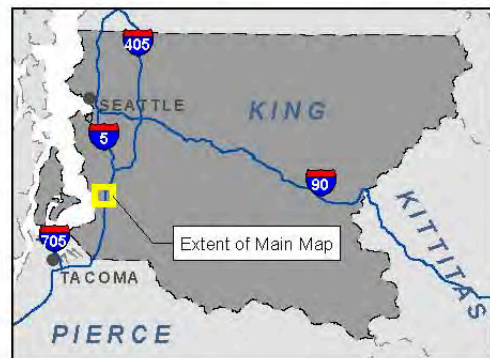
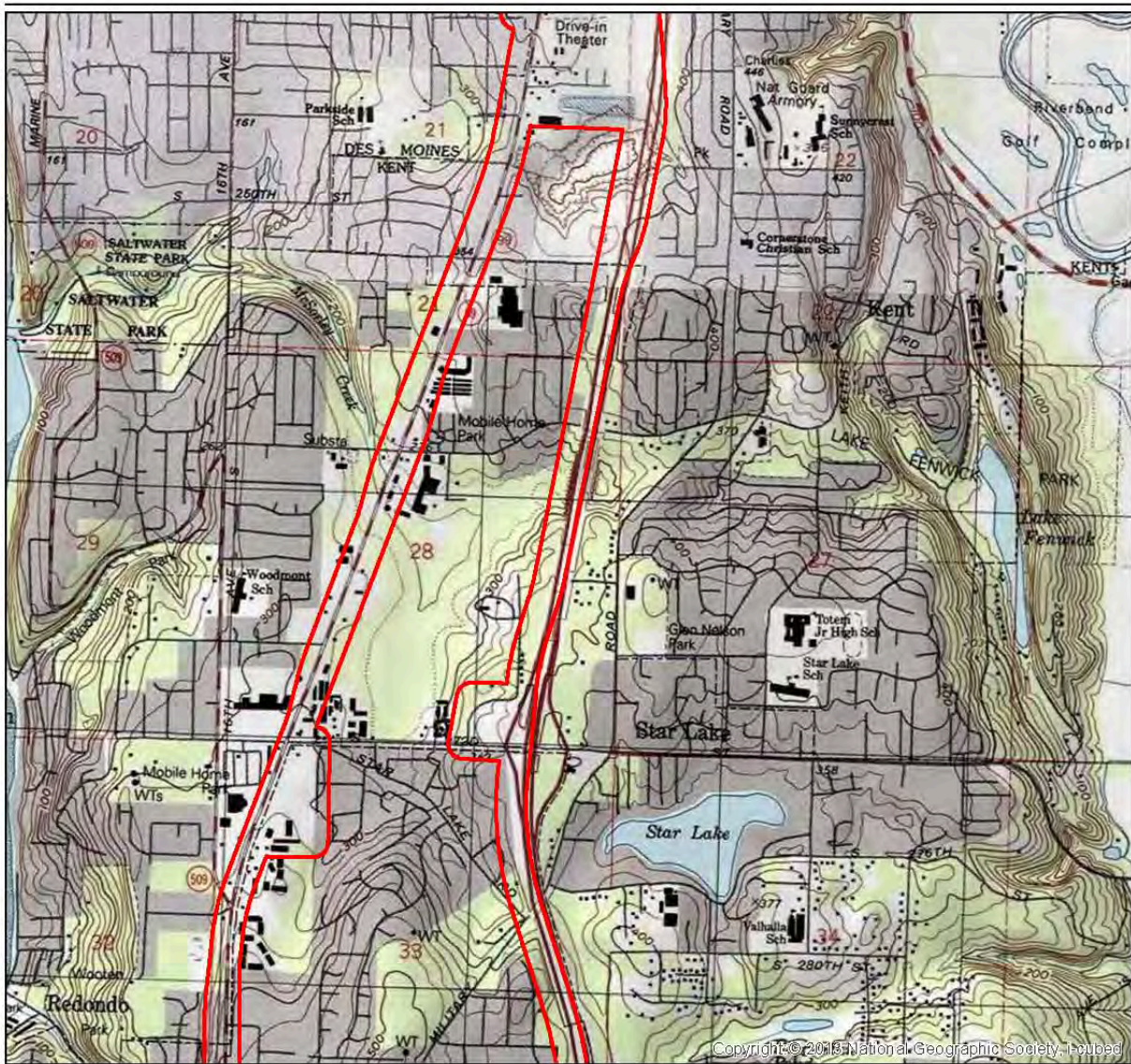


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33

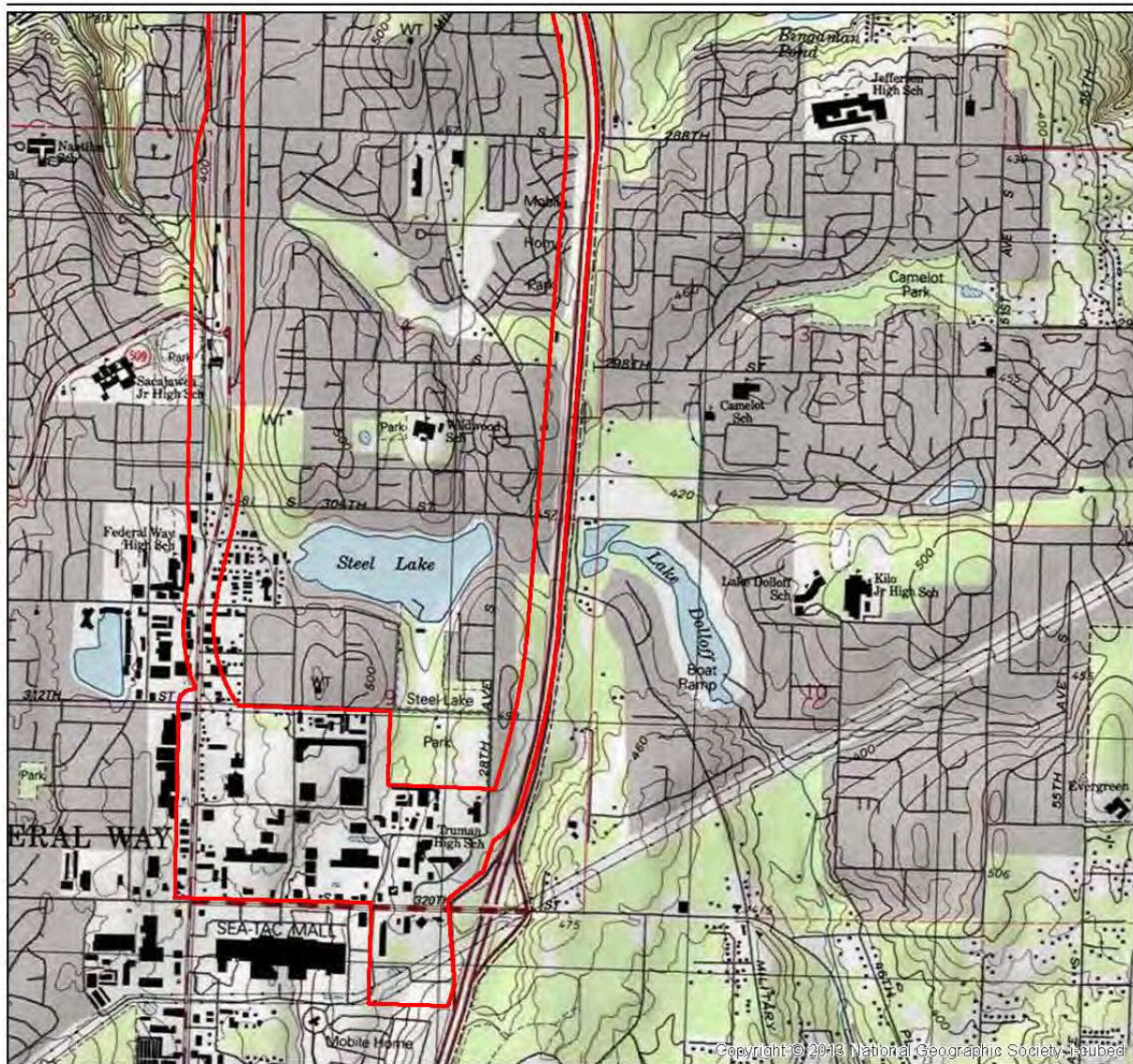


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FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33

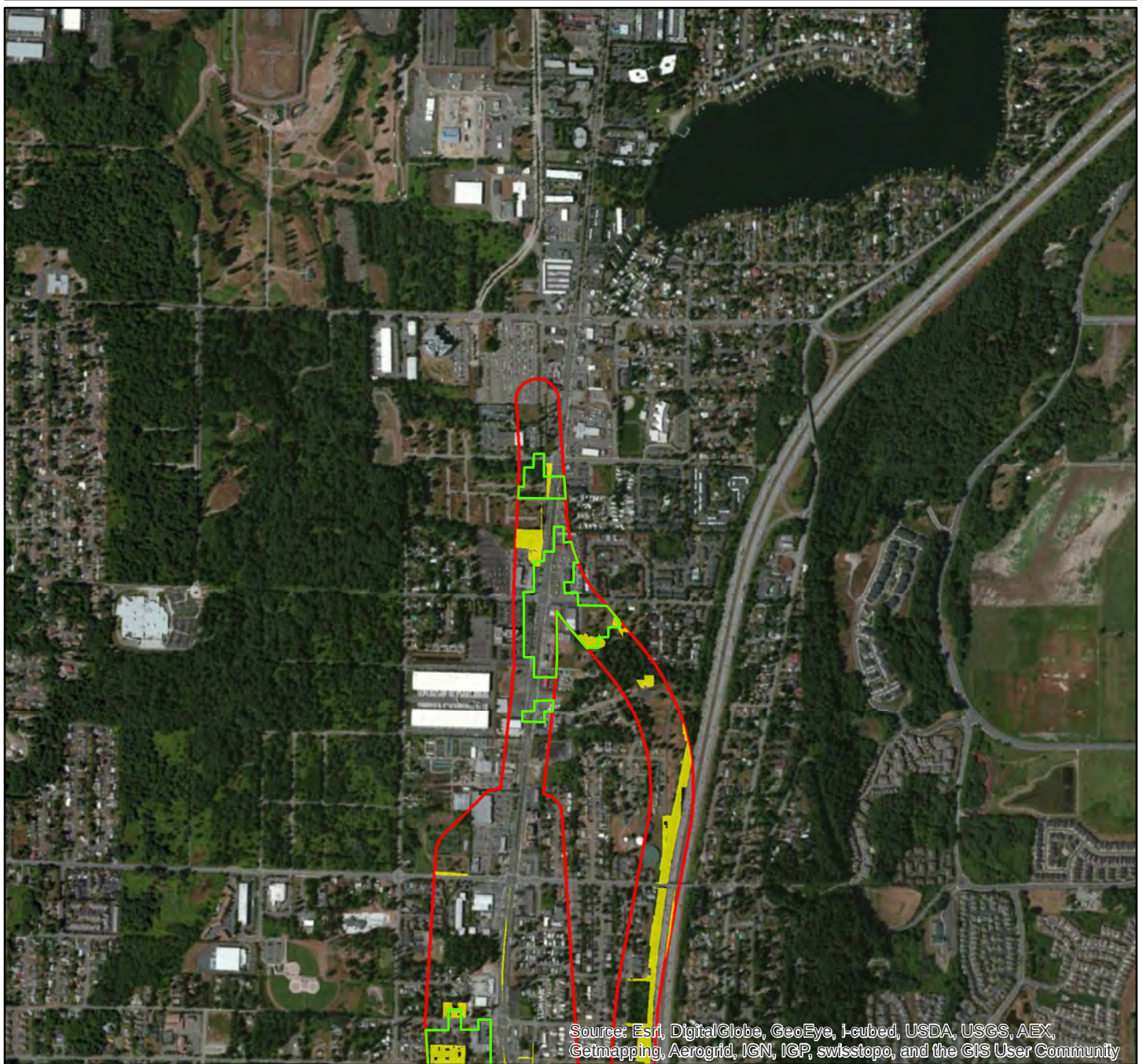


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FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:
 Statewide Predictive Model: Environmental Factors with Archaeological Resources Results. Washington Information System for Architectural and Archaeological Records Data, Department of Archaeology and Historic Preservation. 2014.
 Impervious/Impacted Surface Interpretation. King County GIS Center. 2009.

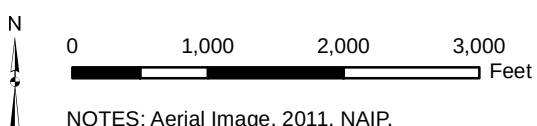
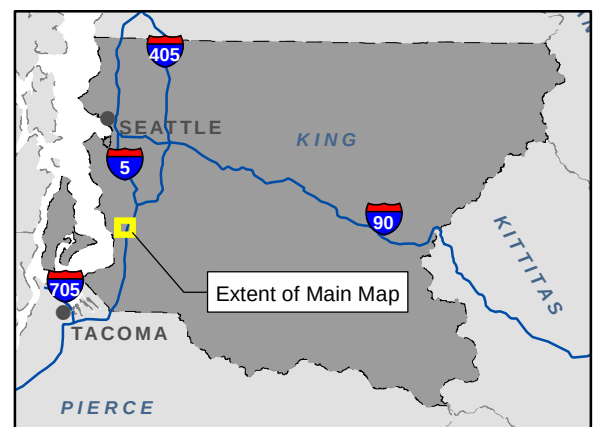
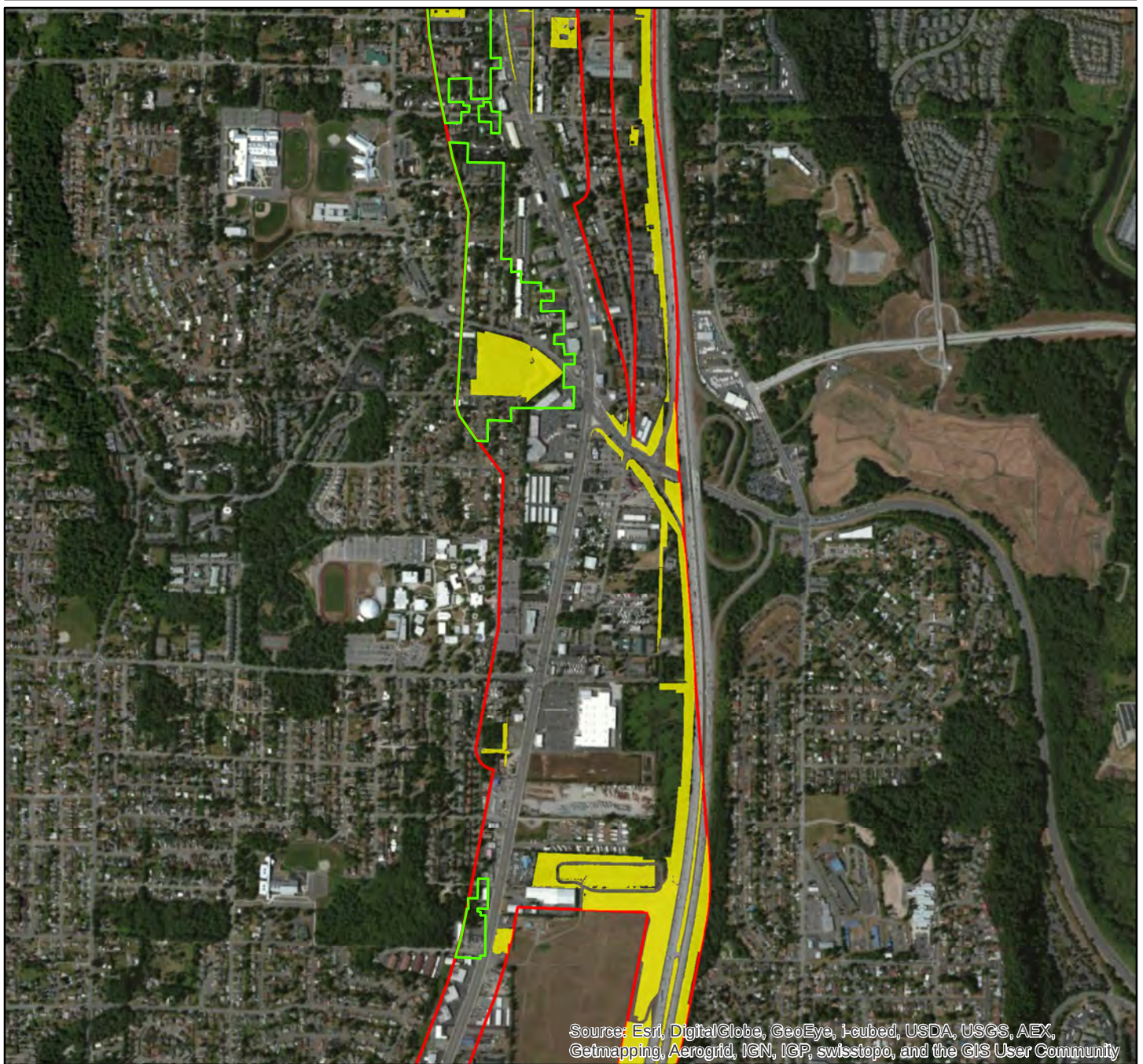


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:

Statewide Predictive Model: Environmental Factors with Archaeological Resources Results. Washington Information System for Architectural and Archaeological Records Data, Department of Archaeology and Historic Preservation. 2014.

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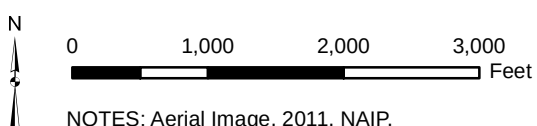
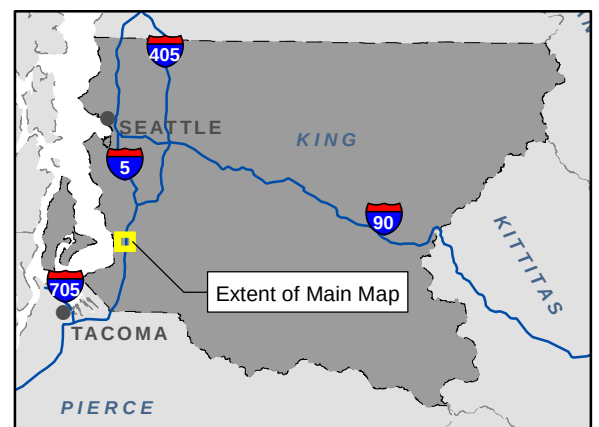
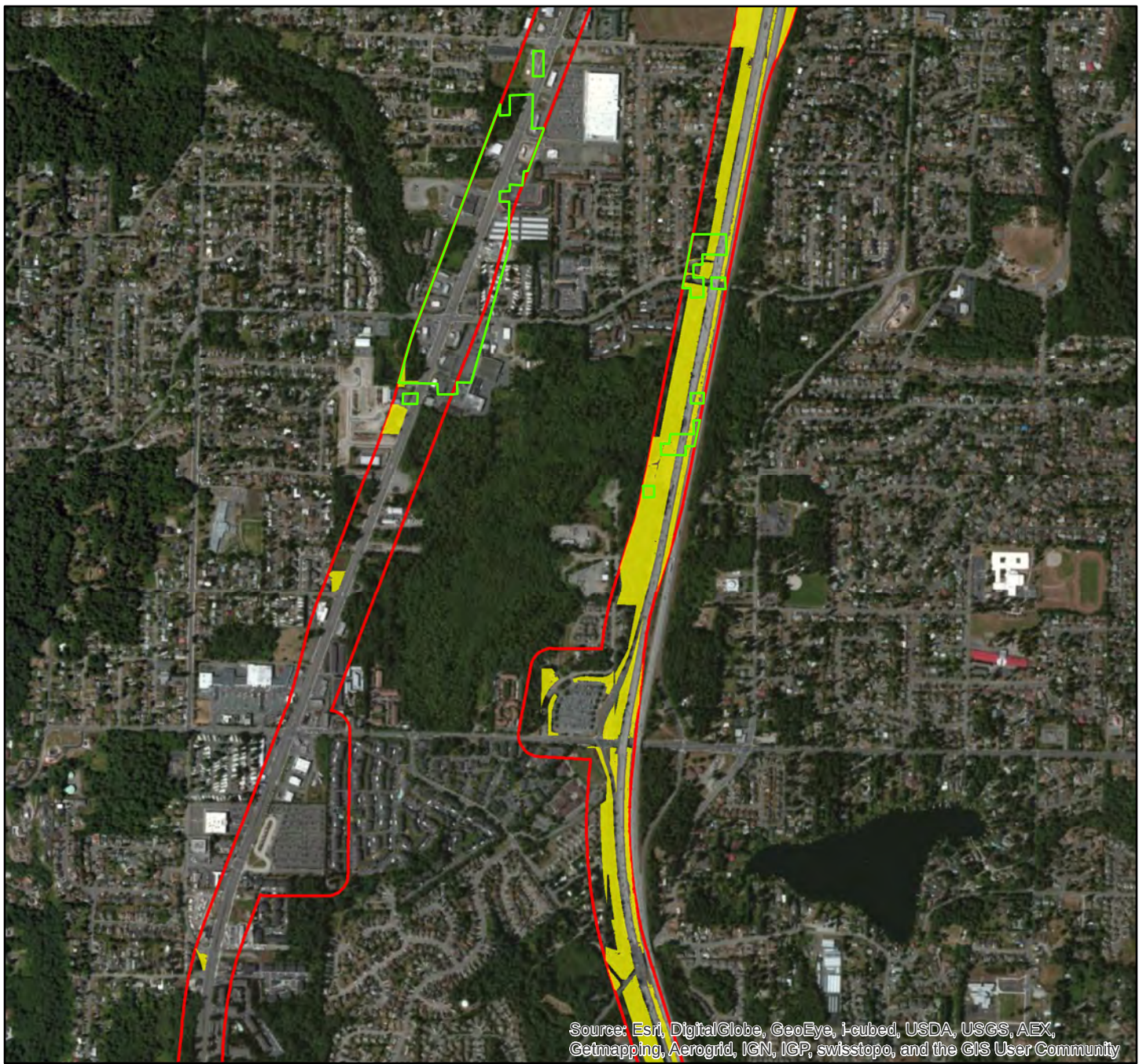


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

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Sources:
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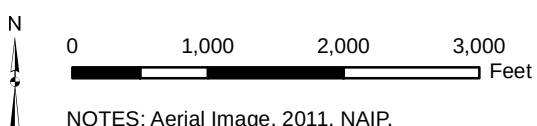
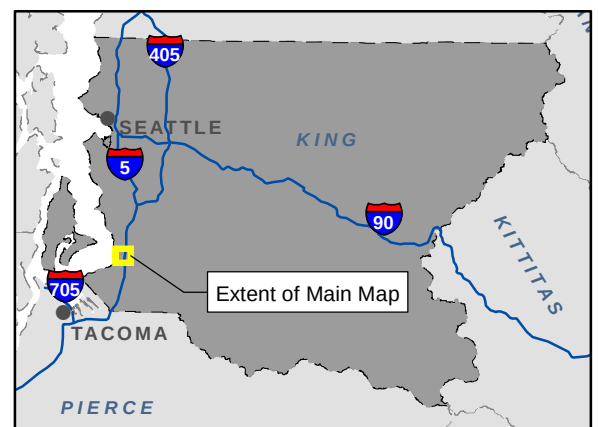
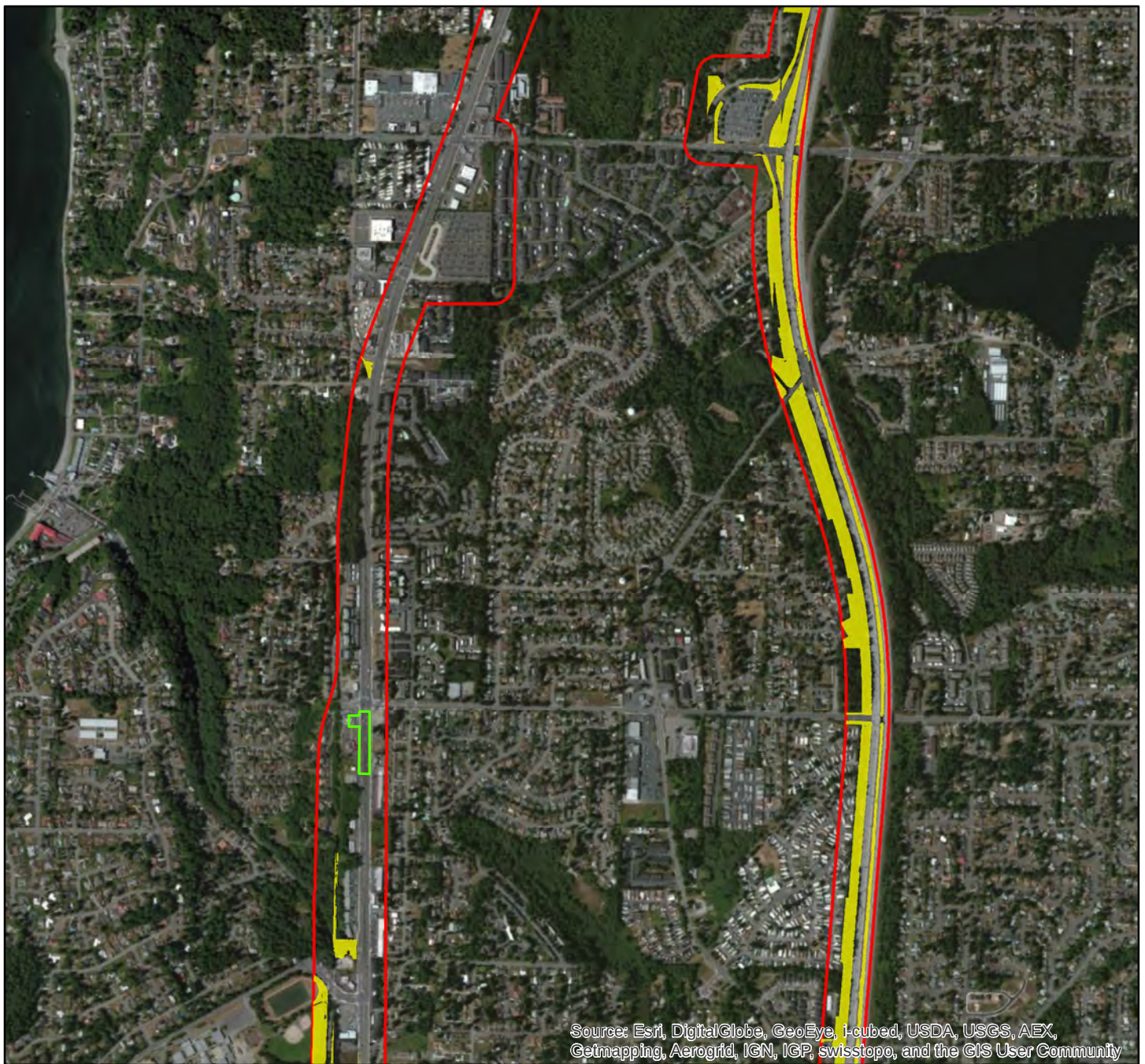


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

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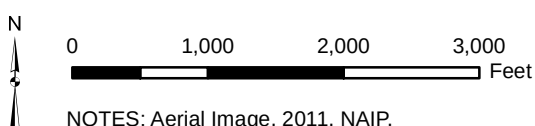
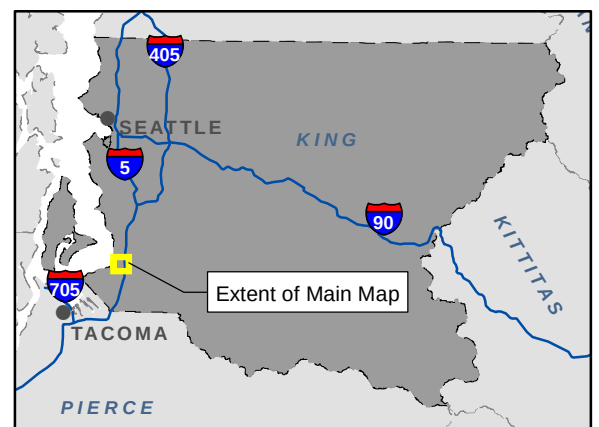
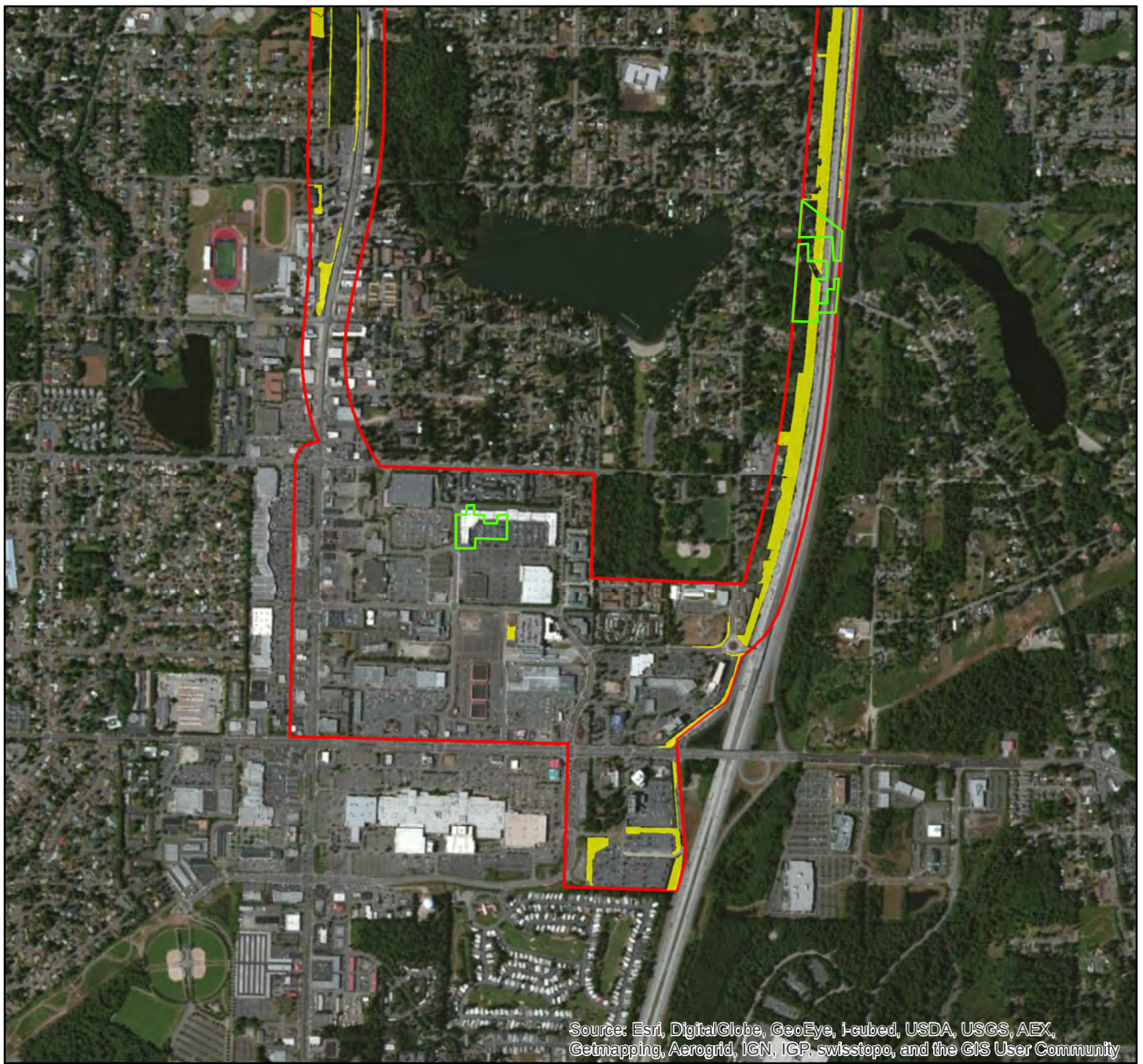


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

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Sources:

Statewide Predictive Model: Environmental Factors with Archaeological Resources Results. Washington Information System for Architectural and Archaeological Records Data, Department of Archaeology and Historic Preservation. 2014.

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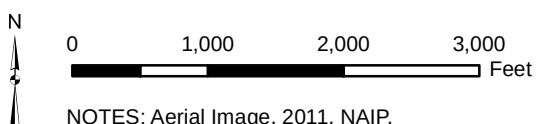
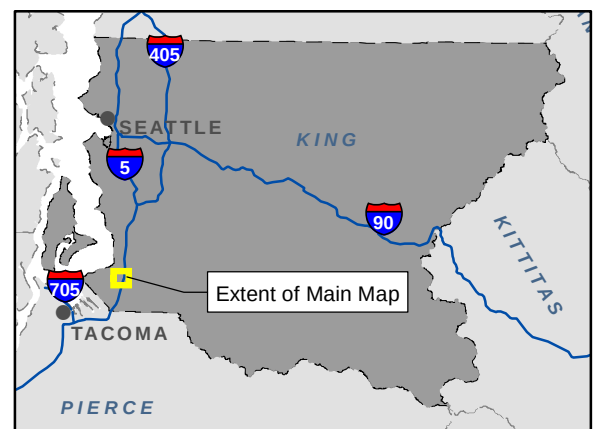


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA

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U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

April 2, 2014

Herman Dillon Sr.
Council Chairman
Puyallup Tribe of Indians
3009 E Portland Ave
Tacoma, WA 98404

**Re: Sound Transit Federal Way Link Extension
Area of Potential Effect & Archaeological Survey Plan**

The Honorable Herman Dillon Sr.:

The Federal Transit Administration (FTA) initiated Section 106 consultation for the Sound Transit Federal Way Link Extension (FWLE), previously Federal Way Transit Extension, in June 2013. Since then, an area of potential effect (APE) and an archaeological survey plan have been developed for the project. The project and APE are described below. This letter invites your review and comments on the APE and the enclosed archaeological survey plan.

Project Description:

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Area of Potential Effect

The APE extends 200 feet from each side of the center of the guideway alignments. It also includes a radius of approximately 200 feet from the outer limits of station locations and ancillary facilities. Specific locations and footprints for the Kent-Des Moines station, and the Federal Way Transit Center station have not been finalized. In these areas the APE includes the entirety of the area between Kent-Des Moines Road, South 240th Street, SR 99, and I-5; and most of the area between South 312th Street and South 320th Street in Federal Way (see Figure 1, page 3 and Figure 2, page 5). Excluded from consideration is part of Steel Lake Park.

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Sincerely,



R.F. Krochalis
Regional Administrator

Enclosures: Archaeological Survey Plan

cc: Brandon Reynon, Puyallup Tribe of Indians
Matthew Sterner, DAHP
Kent Hale, Sound Transit

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Sound Transit Federal Way Link Extension

Research Design for Archaeological Fieldwork

Prepared by

Keith Mendez, M.A., CH2M HILL, Inc.

March 2014

1.0 Introduction

The Federal Transit Authority (FTA) and Sound Transit have proposed the Federal Way Link Extension (FWLE) project to expand the Sound Transit Link light rail system from SeaTac to the cities of Des Moines, Kent, and Federal Way in King County. The proposed project would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. Sound Transit is preparing an environmental impact statement (EIS) in compliance with the National Environmental Policy Act and the Washington State Environmental Policy Act. The Draft EIS is expected to be published in late 2014 or early 2015. Following public and agency comments on the Draft EIS, the Sound Transit Board will identify a Preferred Alternative. The Final EIS will evaluate the Preferred Alternative further, and following publication of the Final EIS and issuance of the Record of Decision (ROD) by FTA, the Sound Transit Board will identify the project to be built. Final design and right-of-way acquisition will not occur until after the ROD and board decision.

Section 106 consultation was initiated with the Washington State Department of Archaeology and Historic Preservation (DAHP), the federally-recognized Muckleshoot, Puyallup, Snoqualmie, Stillaguamish, Suquamish, and Yakama tribes, and the non-federally recognized Duwamish and Snohomish tribes on June 13, 2013. DAHP concurred with the Area of Potential Effect (APE) notification on December 30, 2013. An archaeological survey will be employed to meet the reasonable and good faith effort identification requirements of Section 106 and the Washington State Standards for Cultural Resource Reporting. This document outlines the methodology that will be employed during this effort.

2.0 Project Location

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
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Sections 4, 5, 8, 9, & 16
Township 22 N, Range 4 E
Sections 4, 9, 10, 15, 16, 21, 22, 28, 32, & 33

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The archaeological survey is intended to gather information in two phases about the historic and pre-contact archaeological record. The purpose of the research design is to provide a methodology for conducting the survey, inventory, data collection, and report preparation.

The Phase I field work will include a reconnaissance level survey of the footprint of the design alternatives, and subsurface testing of areas of interest to identify archaeological sites. Phase II field work would include additional archaeological excavation that might be needed to evaluate properties for inclusion in the National Register of Historic Places if any such properties are identified during Phase I.

Phase I will occur during preparation of the Draft EIS within public right-of-way and publicly owned parcels where access has been granted. For all other parcels (public and private), only the reconnaissance survey will be completed prior to the Draft EIS. Areas identified for a more intensive Phase I survey will be surveyed after the Preferred Alternative has been identified and before the Final EIS, where access can be obtained. If access to these parcels cannot be obtained prior to the Final EIS, the more intensive survey will occur during final design once the property has been acquired by Sound Transit. If areas requiring a Phase II survey are identified prior to the Final EIS, this survey will be completed and a determination of eligibility will be submitted to DAHP.

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The APE has been defined to include all design alternatives to be included in the Draft EIS (Figure 1). Impervious surface data were received from King County and overlaid on the APE to identify all portions of the APE that contain impervious surfaces such as roads, parking lots, or buildings. This information was examined to identify portions of the APE that could be inspected for the presence of historic properties (Figure 2). Out of a total APE containing 1,261 acres, impervious surfaces account for 565 acres. The remaining 696 acres include parcels in public and private ownership. This investigation examines only those parcels in public ownership that are not identified as impervious, which account for approximately 187.37 acres.

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The Phase I fieldwork will include an archaeological survey consisting of background research of areas recently surveyed, review of the statewide predictive model provided by DAHP, a review of available geologic information from geotechnical borings and the Washington State Department of Natural Resources, and a reconnaissance level survey of portions of the APE that contain native sediments and have not been surveyed within the past 5 years. The reconnaissance survey will include inspecting portions of the APE to identify locations appropriate for further archaeological investigations, or Areas of Interest (AOIs).

Once AOIs are identified, an archaeological survey will be conducted in accordance with the guidelines provided by DAHP. Crew members will survey in parallel linear transects spaced no more than 30 meters (98 feet) apart. Any cultural materials identified will be documented and photographed. It is expected that where the ground is not covered in impermeable surfaces (asphalt, concrete, or compacted gravel), ground surfaces will be obscured by vegetation. At the discretion of the Project Archaeologist, locations will be identified where subsurface test units (STUs) may be employed to sample sediments in these areas. STUs will be excavated minimally to 60 centimeters (cm) (2 feet) below the ground surface or until obstructed. All sediments will be screened through a 0.6-cm (1/4-inch) wire mesh screen. If buried cultural materials are encountered in any STU, one STU will be excavated up to 4.5 meters (15 feet) away in each cardinal direction (north, south, east, and west) to establish site boundaries without intruding on impervious surfaces, or areas outside of the APE. Where access and site conditions allow, this method will be employed until two adjacent sterile STUs are encountered. Field documentation will include descriptions of the stratigraphic profile, soil type descriptions, and descriptions of any cultural

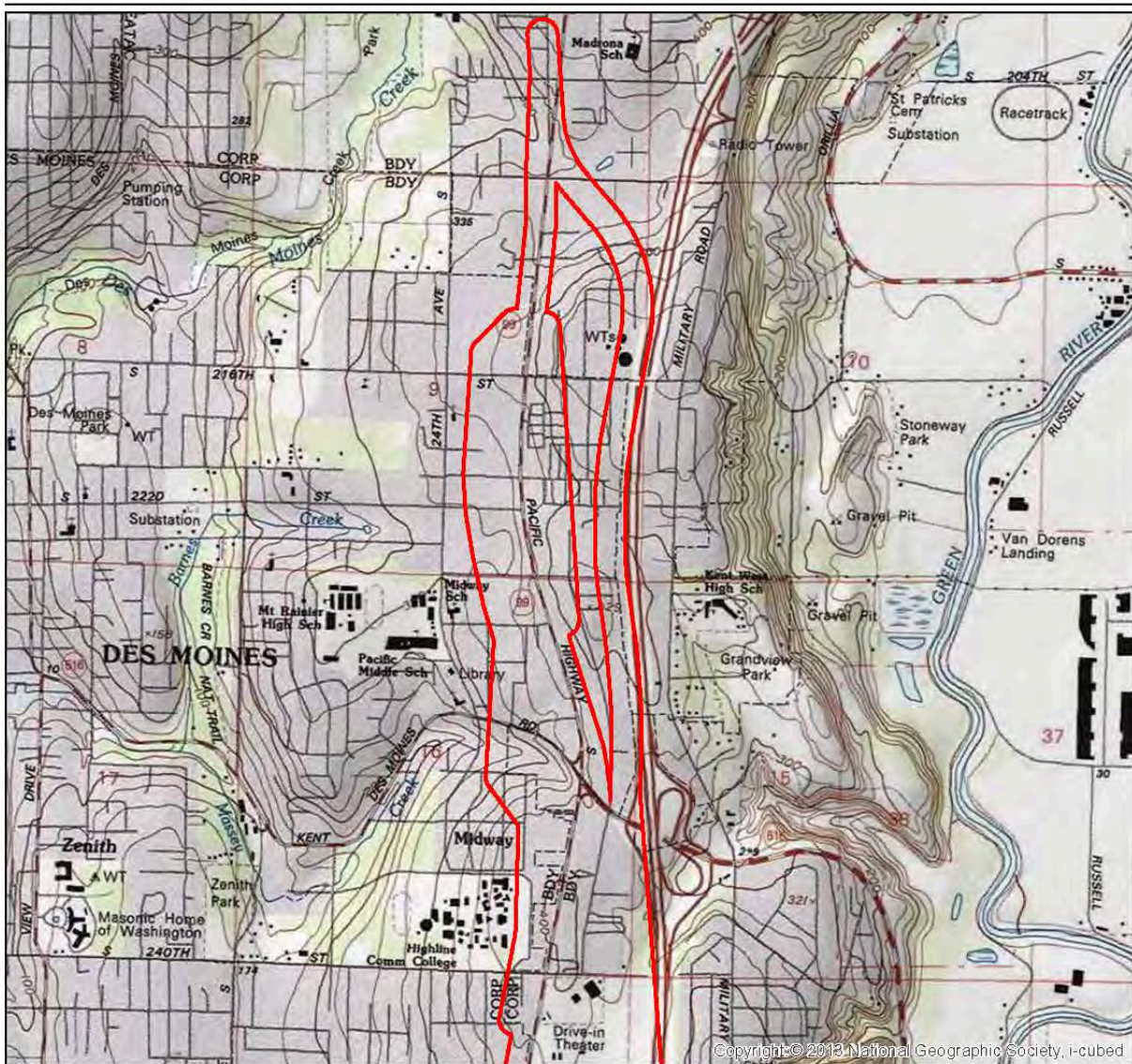
materials identified. Global Positioning System (GPS) coordinates and photographs will be collected for each STU. Any artifacts encountered will be analyzed, photographed, and recorded in the field, then reburied in the STU from which they originated. Collection of artifacts is not proposed for this phase of the study. An archaeologist will also review boring logs for any geotechnical borings during development of the Final EIS.

Once site boundaries have been established, the information gathered will be used to complete a Washington State Site or Isolate Inventory Form, as appropriate. Recommendations for site eligibility will be provided where possible, but this phase does not include formal Phase II evaluations that include completion of National Register Evaluation Forms. Per Washington State law (Revised Code of Washington 19.122 E2SHB 1634), it is assumed that utility locates will be conducted prior to the initiation of any subsurface archaeological testing. If no potentially eligible archaeological sites are discovered in the course of the survey, no additional fieldwork (Phase II) will be required. If potentially eligible archaeological sites are discovered, formal Phase II investigations may be recommended. Phase II investigations (evaluations) will be conducted once the Preferred Alternative is identified where potentially National Register eligible sites that cannot be avoided are discovered. A Phase II survey plan will be prepared if and when necessary.

6.0 Report

The results of the archaeological survey will be incorporated into the FWLE Historic and Archaeological Resources Technical Report completed for this undertaking. The results from Phase 1 on accessible properties will be incorporated into the version of this technical report released with the Draft EIS. The results from any additional properties where access will be gained between the Draft EIS and the Final EIS will be incorporated into the version of this technical report released with the Final EIS.

Archaeological sites and isolates, if encountered, will be documented and evaluated as needed to reach a finding of effect for the undertaking. Recommendations regarding the treatment of potentially eligible historic properties that may be identified will be included in the technical report. The technical report will be prepared meeting the Washington State Standards for Cultural Resource Reporting.



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33



0 0.25 0.5 0.75 1 mi

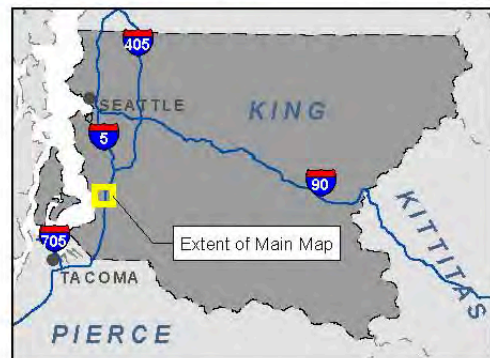
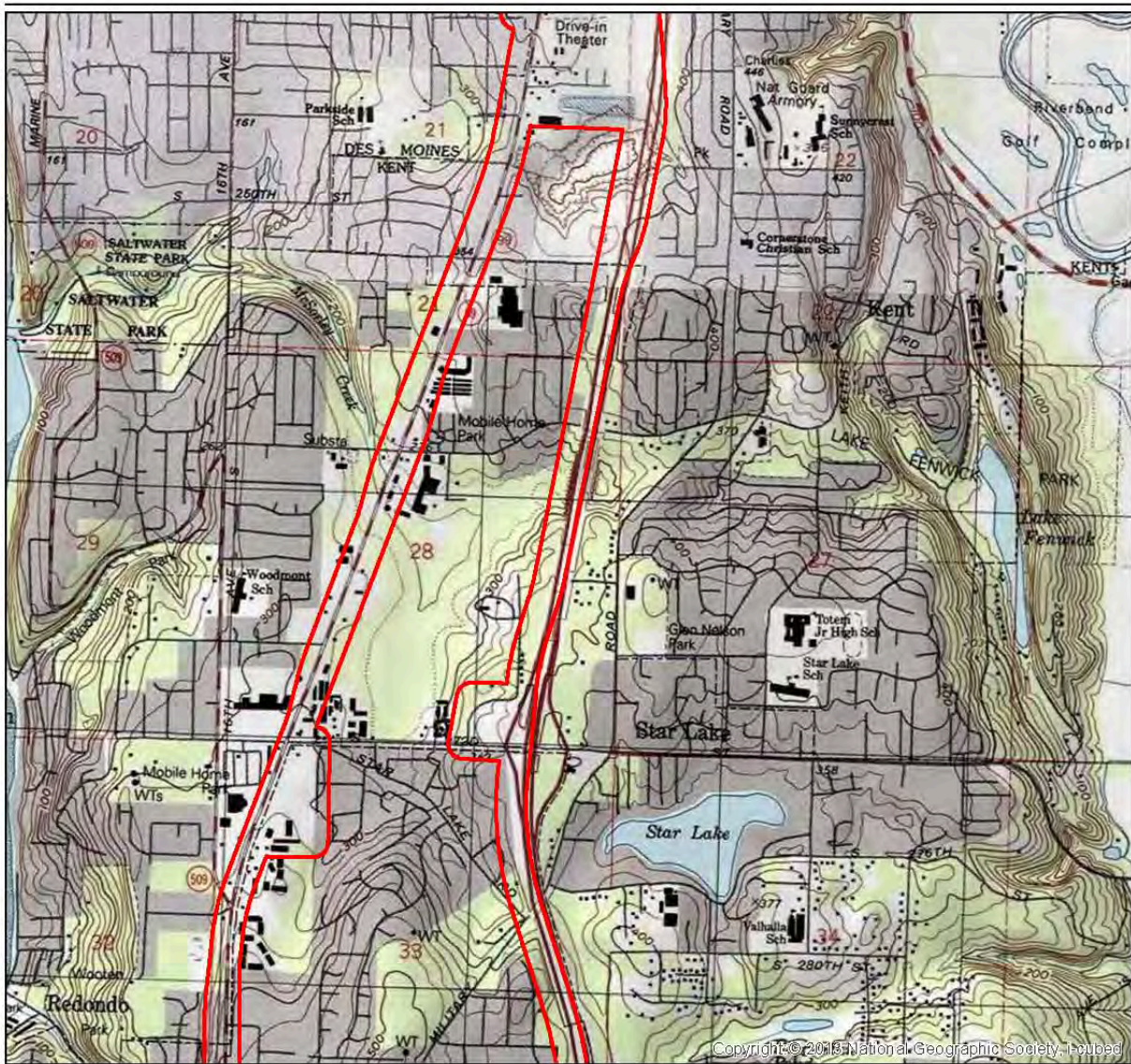


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
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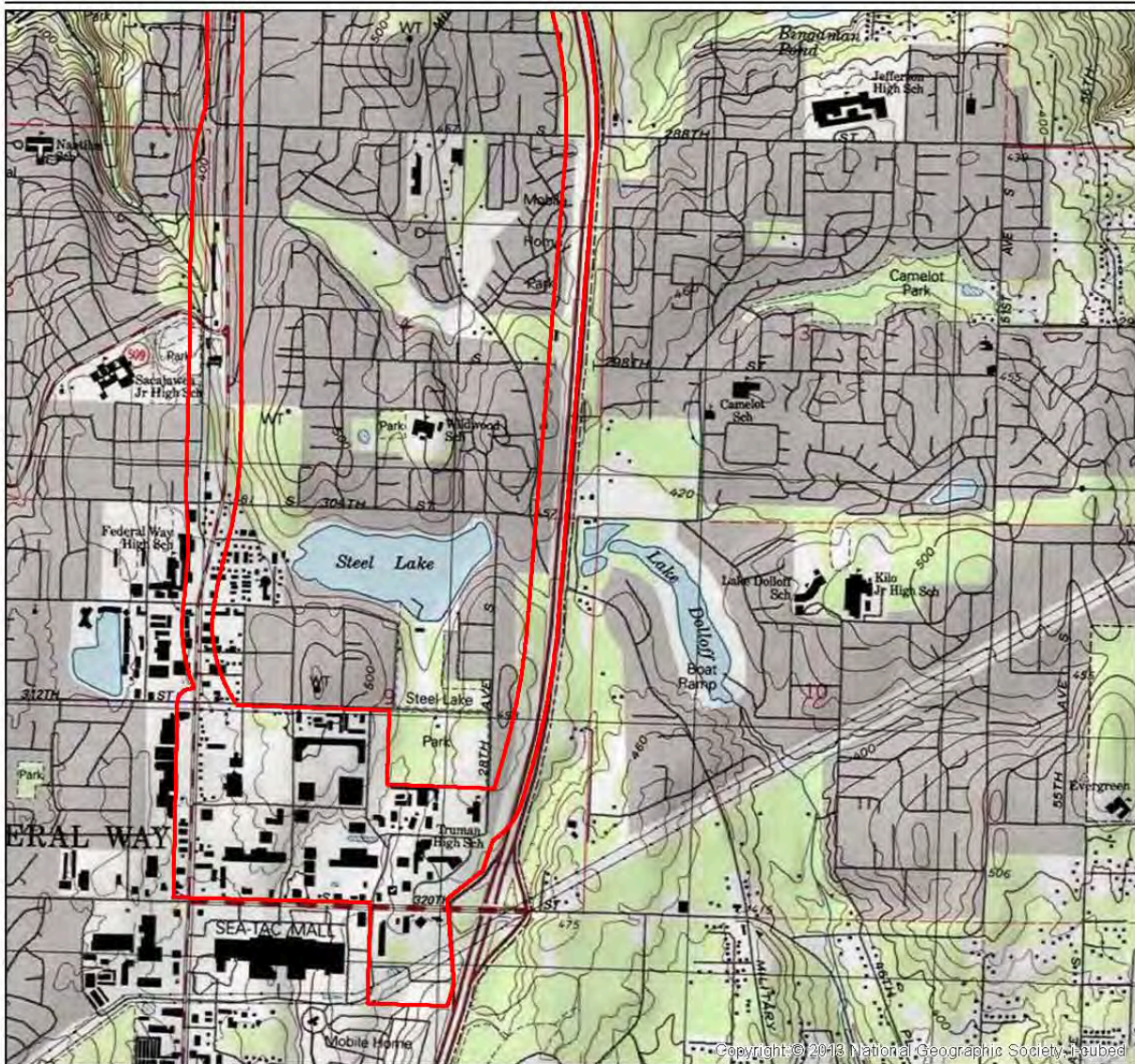


0 0.25 0.5 0.75 1 mi



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Federal Way Link Extension Project
 King County, WA



Legend

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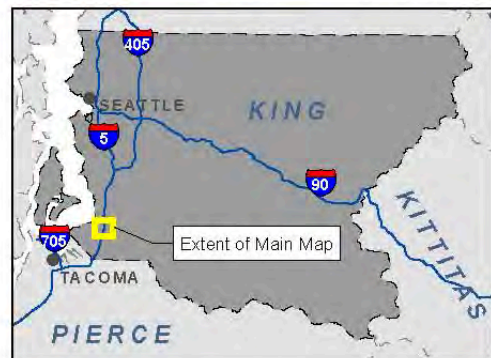
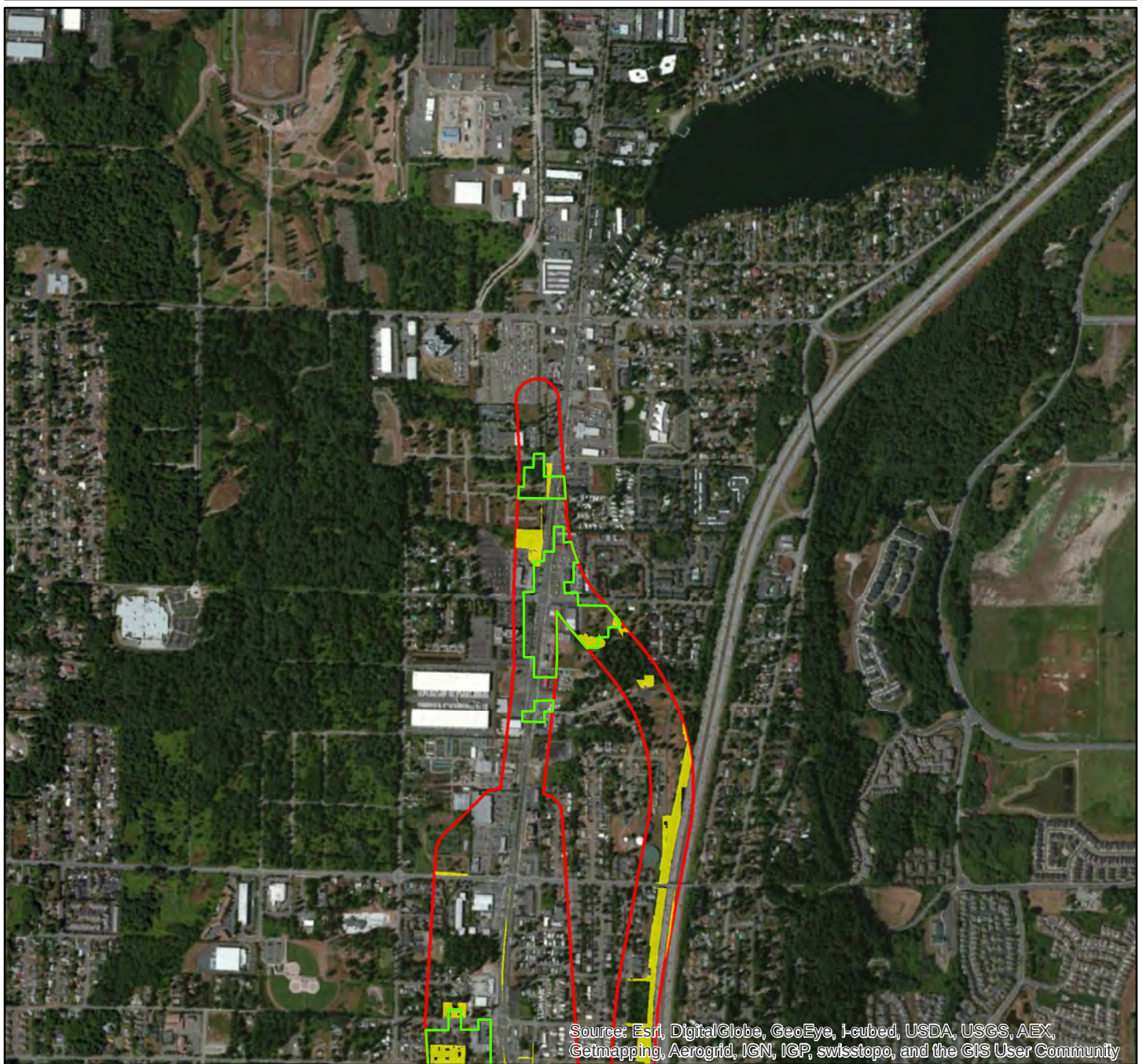


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:
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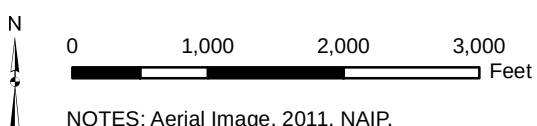
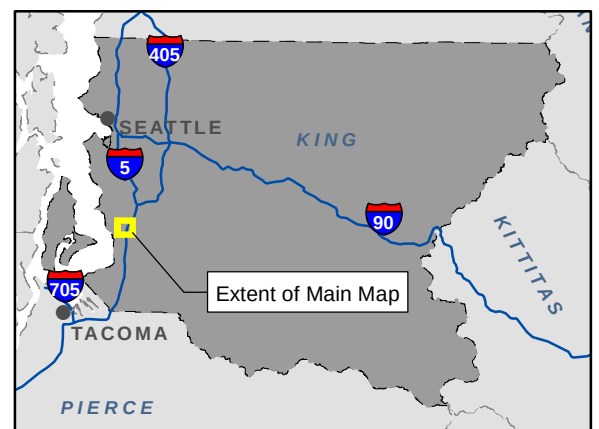
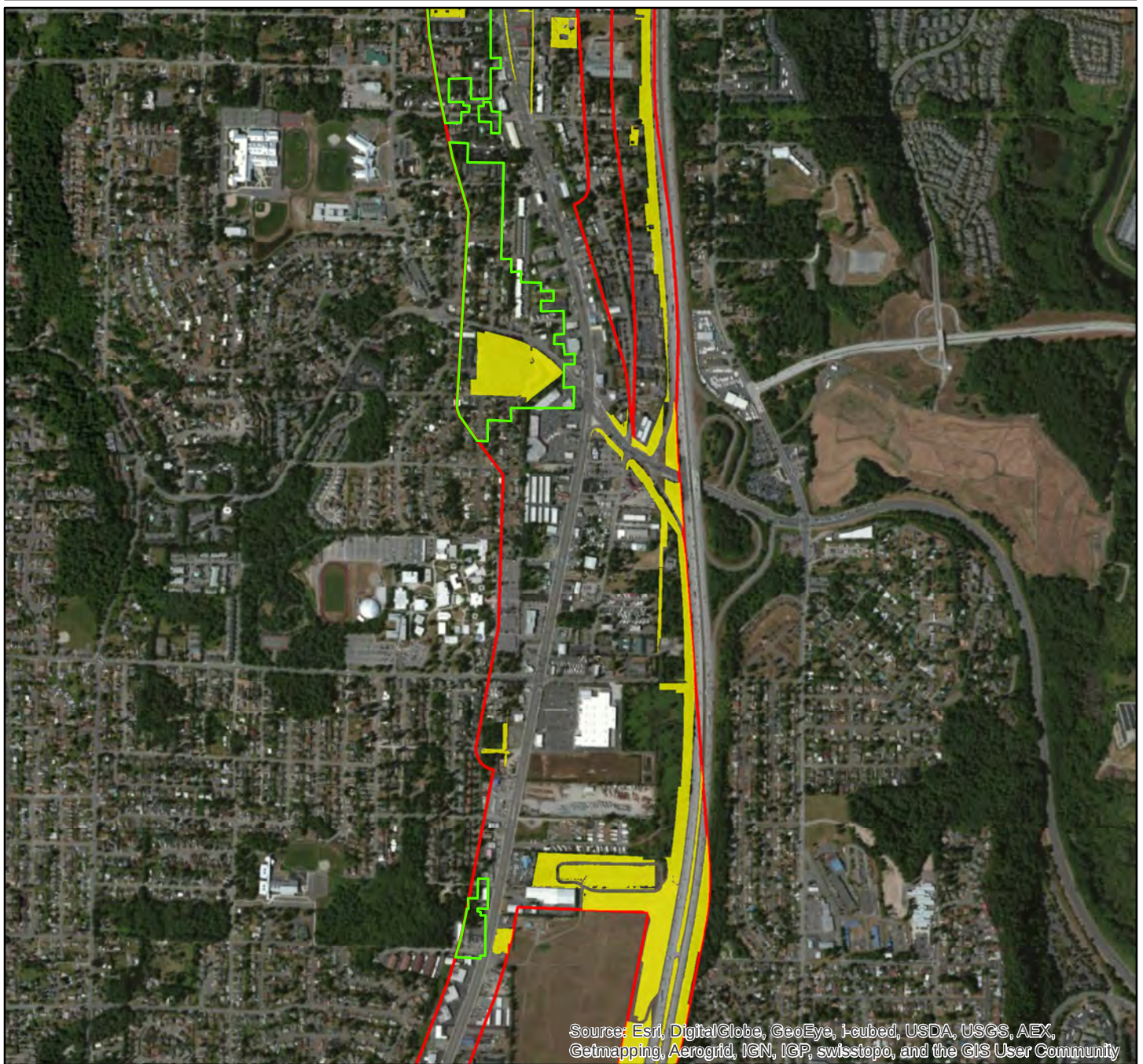


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



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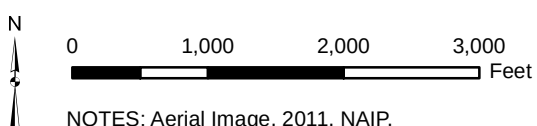
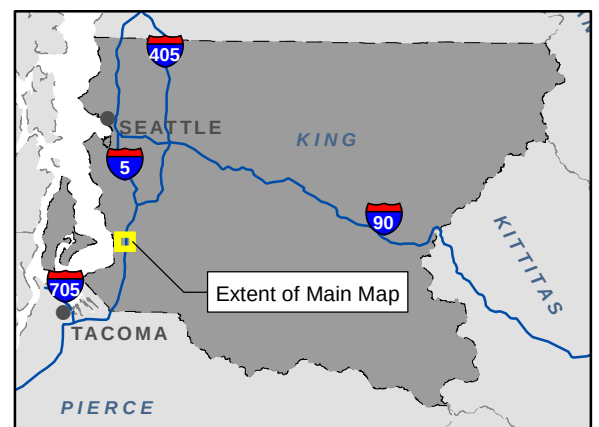
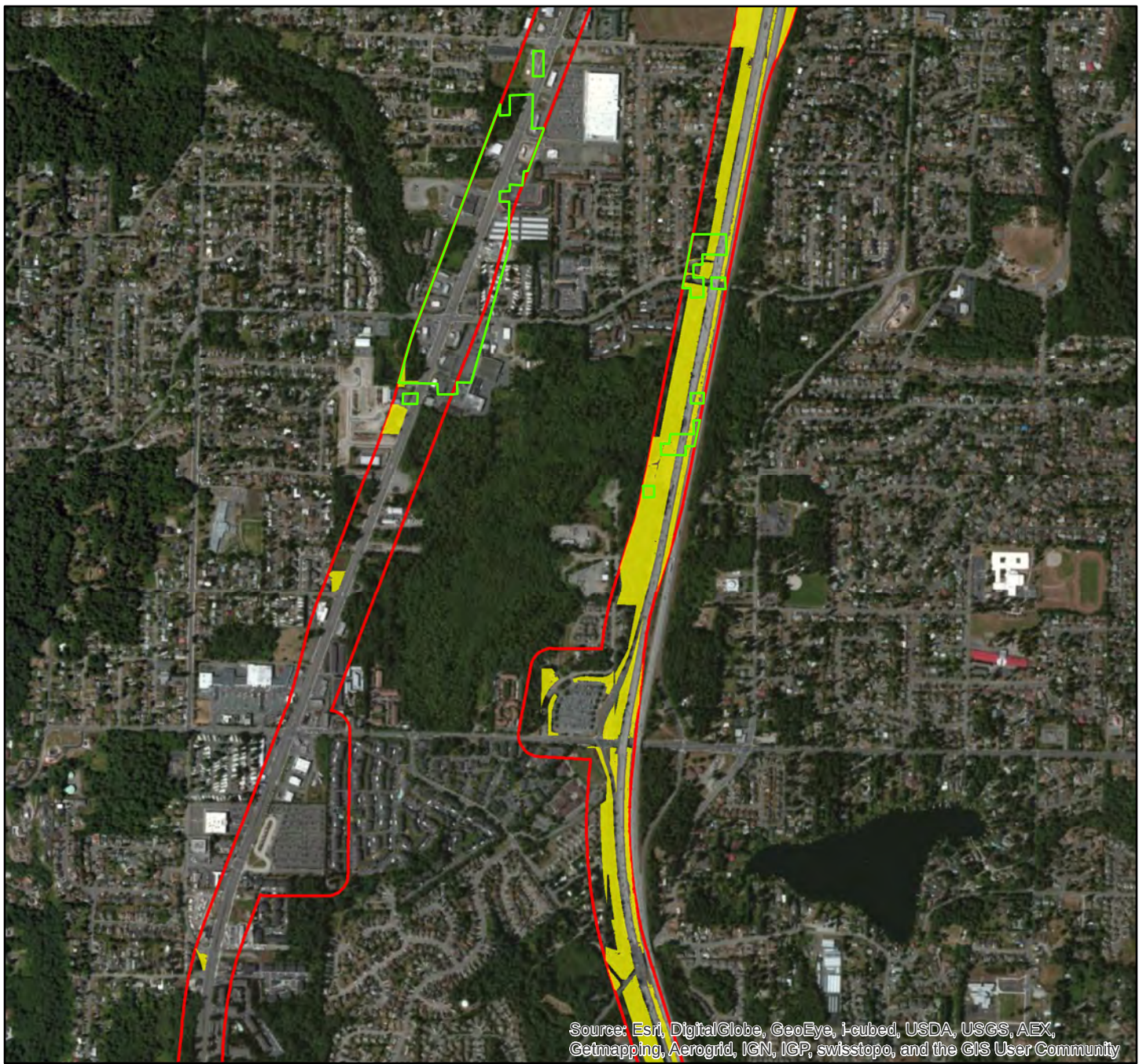


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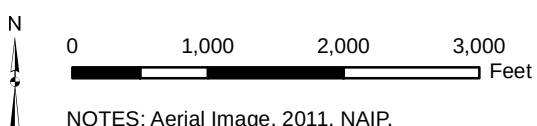
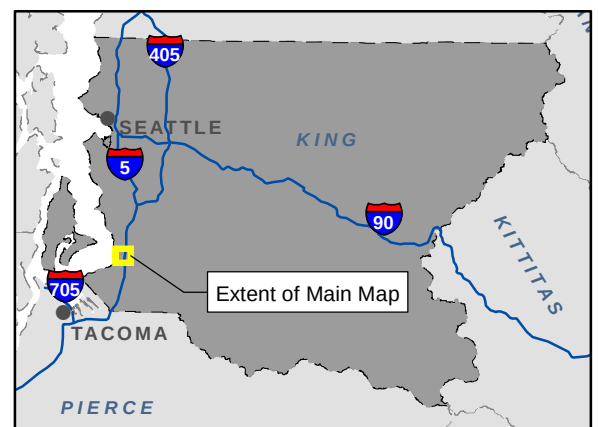
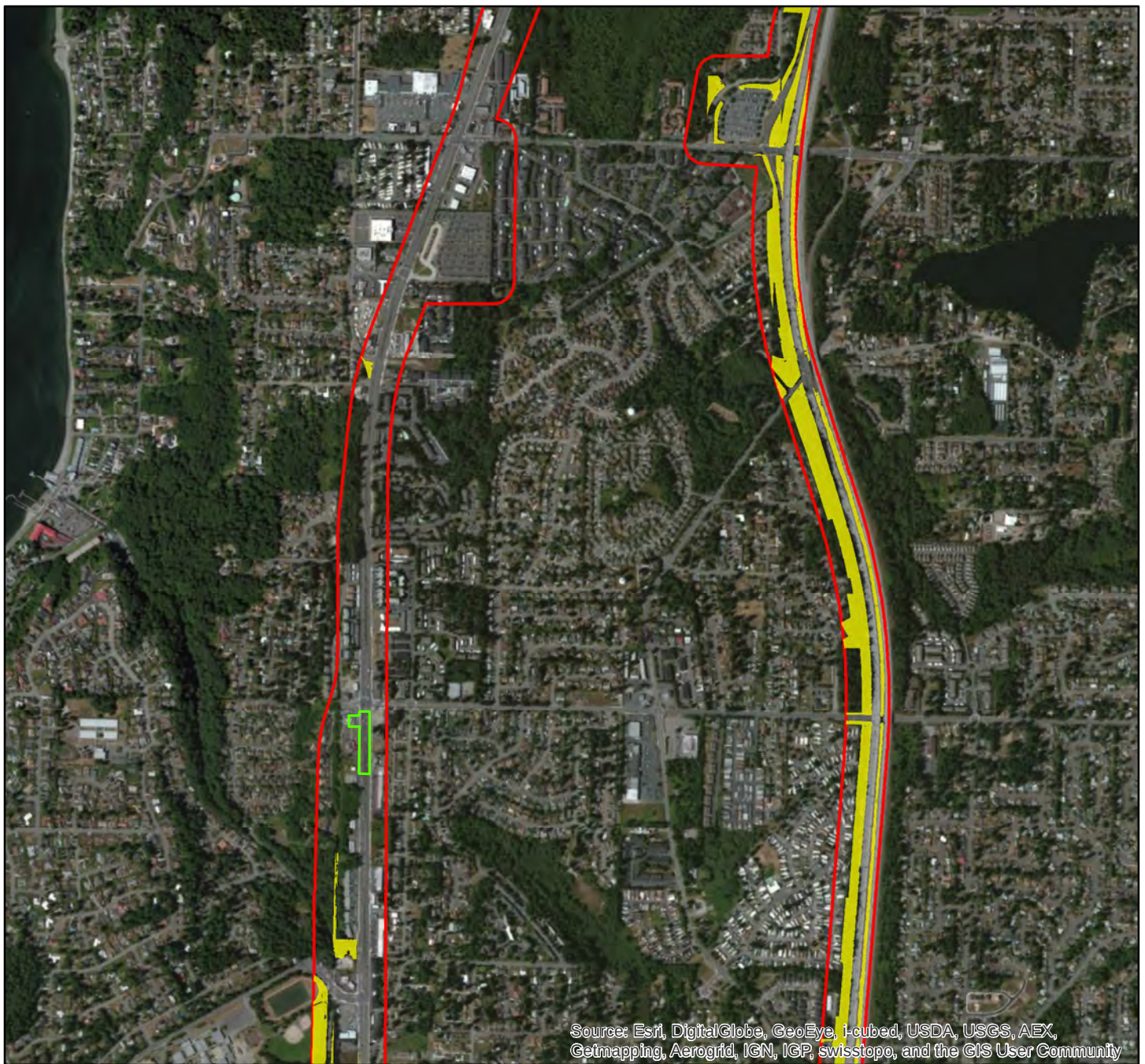


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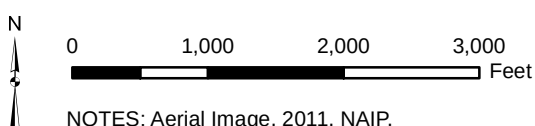
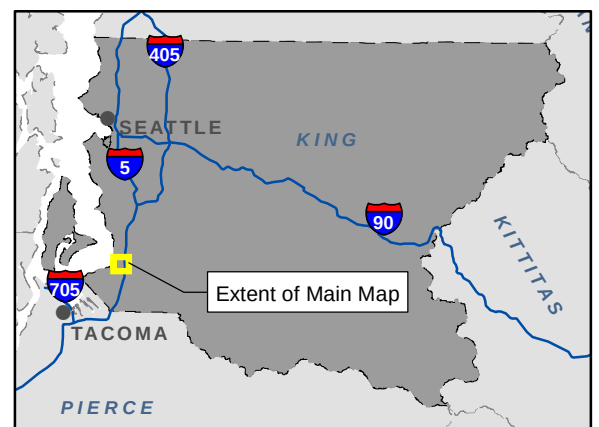
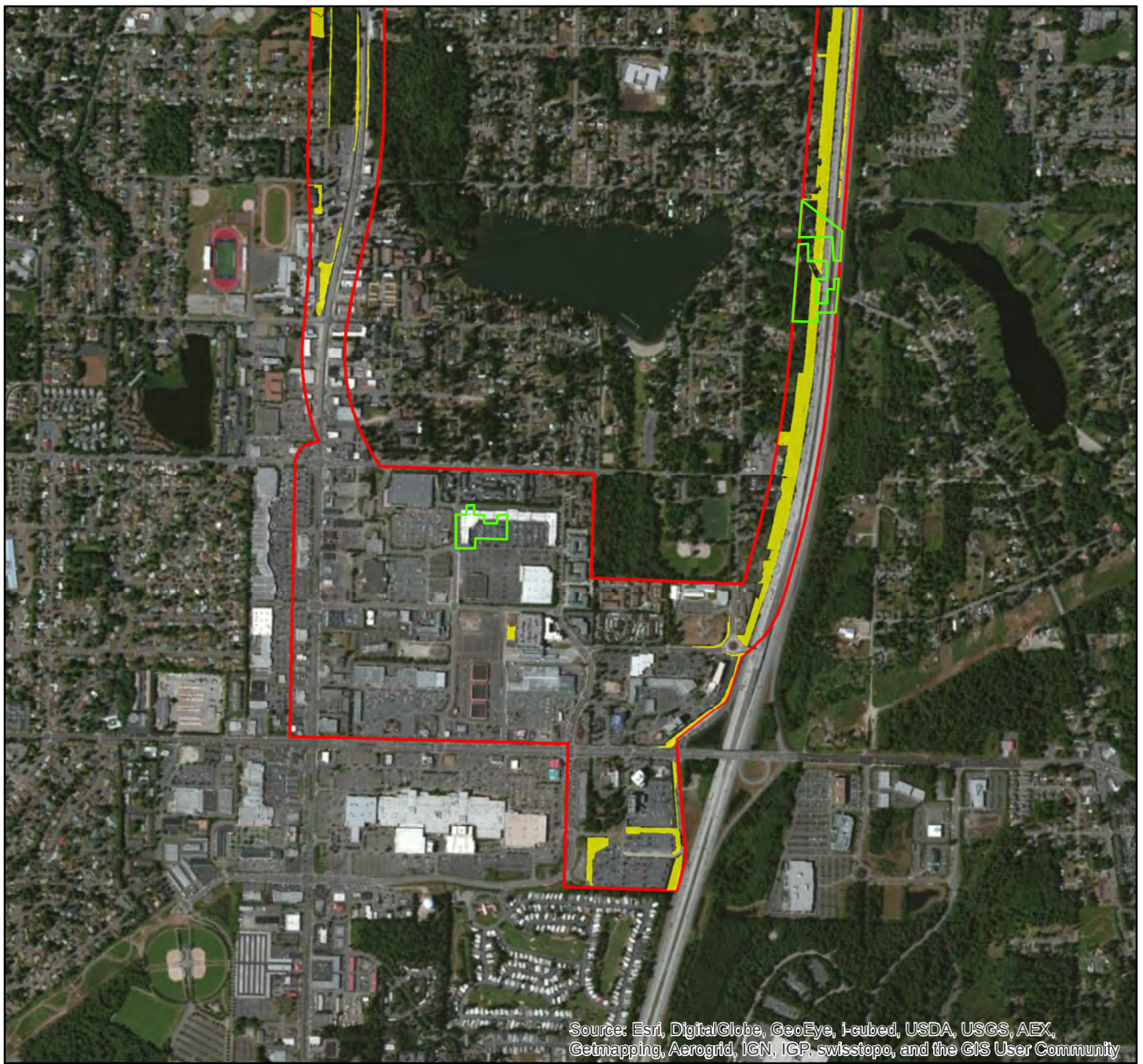


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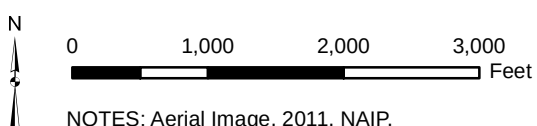
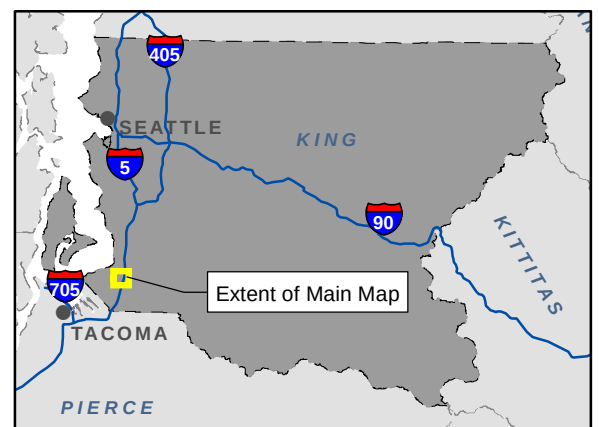


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U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

April 2, 2014

Leonard Forsman
Tribal Chair
Suquamish Tribe
PO Box 498
Suquamish, WA 98392-0498

**Re: Sound Transit Federal Way Link Extension
Area of Potential Effect & Archaeological Survey Plan**

The Honorable Leonard Forsman:

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Once AOIs are identified, an archaeological survey will be conducted in accordance with the guidelines provided by DAHP. Crew members will survey in parallel linear transects spaced no more than 30 meters (98 feet) apart. Any cultural materials identified will be documented and photographed. It is expected that where the ground is not covered in impermeable surfaces (asphalt, concrete, or compacted gravel), ground surfaces will be obscured by vegetation. At the discretion of the Project Archaeologist, locations will be identified where subsurface test units (STUs) may be employed to sample sediments in these areas. STUs will be excavated minimally to 60 centimeters (cm) (2 feet) below the ground surface or until obstructed. All sediments will be screened through a 0.6-cm (1/4-inch) wire mesh screen. If buried cultural materials are encountered in any STU, one STU will be excavated up to 4.5 meters (15 feet) away in each cardinal direction (north, south, east, and west) to establish site boundaries without intruding on impervious surfaces, or areas outside of the APE. Where access and site conditions allow, this method will be employed until two adjacent sterile STUs are encountered. Field documentation will include descriptions of the stratigraphic profile, soil type descriptions, and descriptions of any cultural

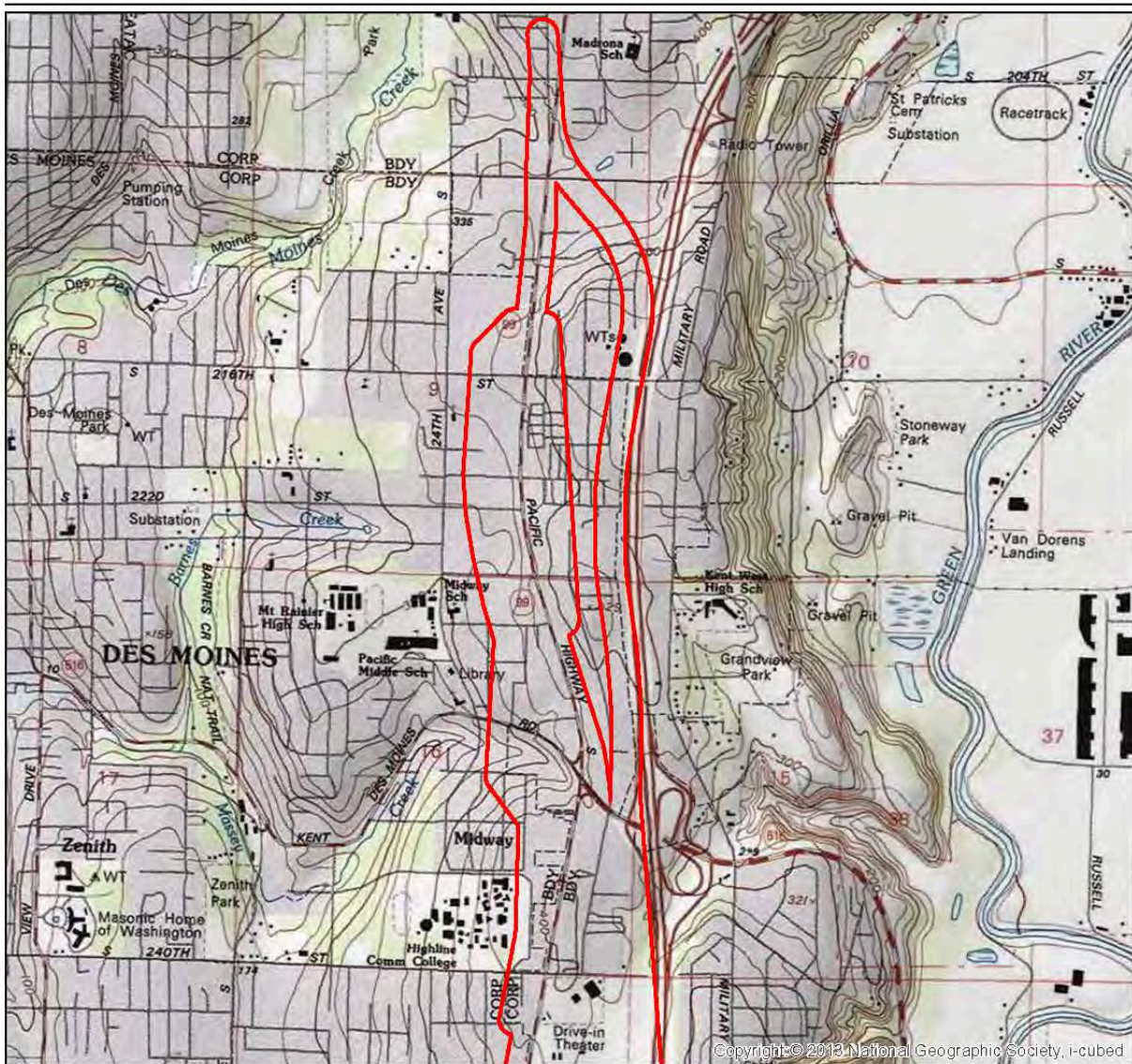
materials identified. Global Positioning System (GPS) coordinates and photographs will be collected for each STU. Any artifacts encountered will be analyzed, photographed, and recorded in the field, then reburied in the STU from which they originated. Collection of artifacts is not proposed for this phase of the study. An archaeologist will also review boring logs for any geotechnical borings during development of the Final EIS.

Once site boundaries have been established, the information gathered will be used to complete a Washington State Site or Isolate Inventory Form, as appropriate. Recommendations for site eligibility will be provided where possible, but this phase does not include formal Phase II evaluations that include completion of National Register Evaluation Forms. Per Washington State law (Revised Code of Washington 19.122 E2SHB 1634), it is assumed that utility locates will be conducted prior to the initiation of any subsurface archaeological testing. If no potentially eligible archaeological sites are discovered in the course of the survey, no additional fieldwork (Phase II) will be required. If potentially eligible archaeological sites are discovered, formal Phase II investigations may be recommended. Phase II investigations (evaluations) will be conducted once the Preferred Alternative is identified where potentially National Register eligible sites that cannot be avoided are discovered. A Phase II survey plan will be prepared if and when necessary.

6.0 Report

The results of the archaeological survey will be incorporated into the FWLE Historic and Archaeological Resources Technical Report completed for this undertaking. The results from Phase 1 on accessible properties will be incorporated into the version of this technical report released with the Draft EIS. The results from any additional properties where access will be gained between the Draft EIS and the Final EIS will be incorporated into the version of this technical report released with the Final EIS.

Archaeological sites and isolates, if encountered, will be documented and evaluated as needed to reach a finding of effect for the undertaking. Recommendations regarding the treatment of potentially eligible historic properties that may be identified will be included in the technical report. The technical report will be prepared meeting the Washington State Standards for Cultural Resource Reporting.



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33



0 0.25 0.5 0.75 1 mi

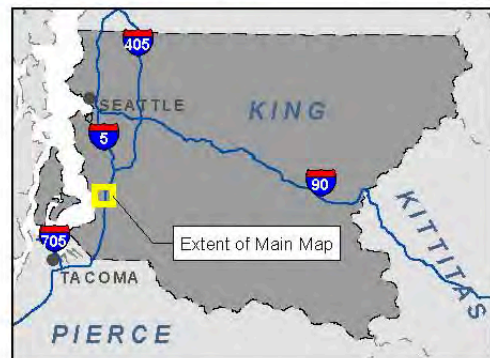
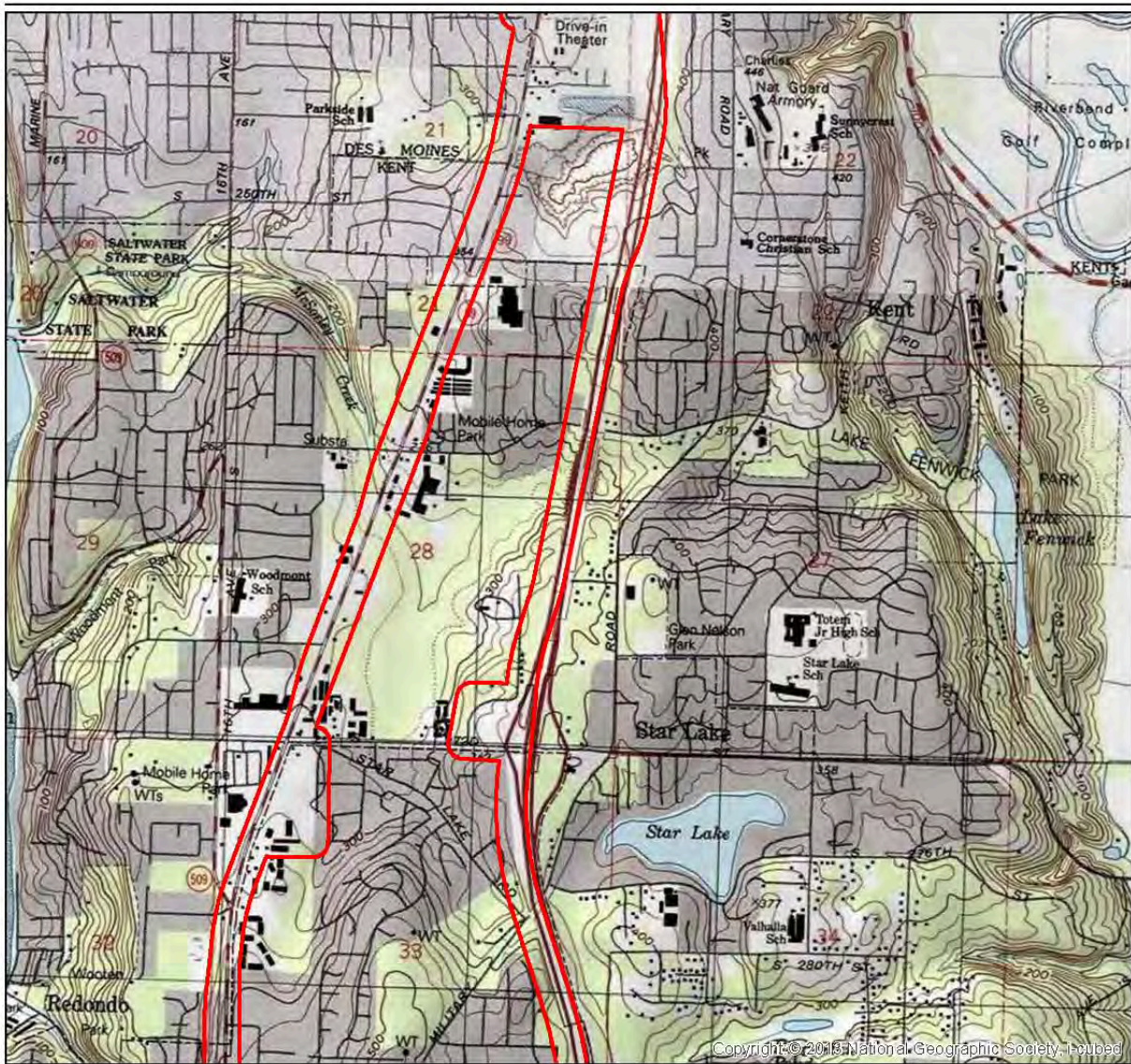


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
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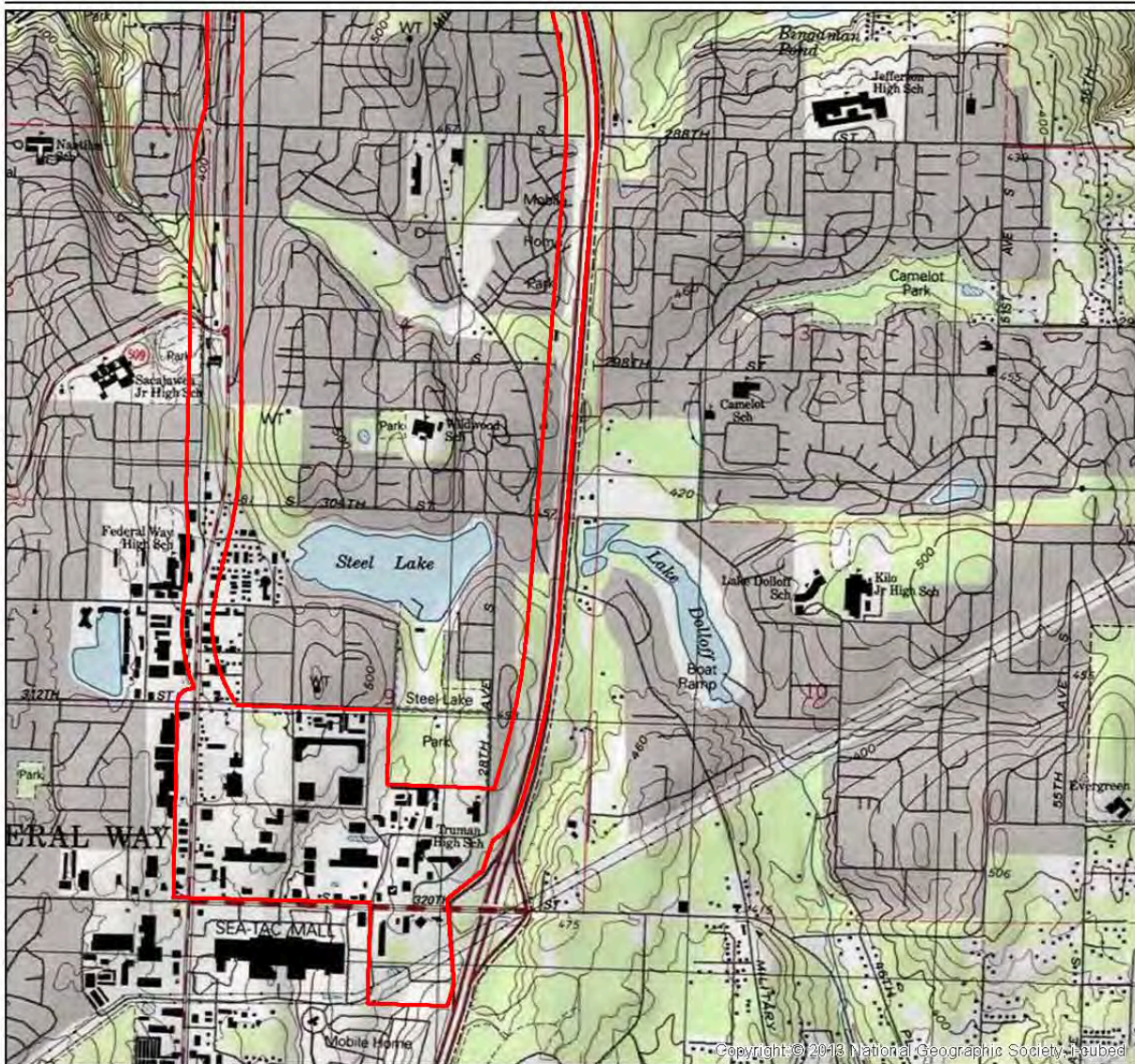


0 0.25 0.5 0.75 1 mi



FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

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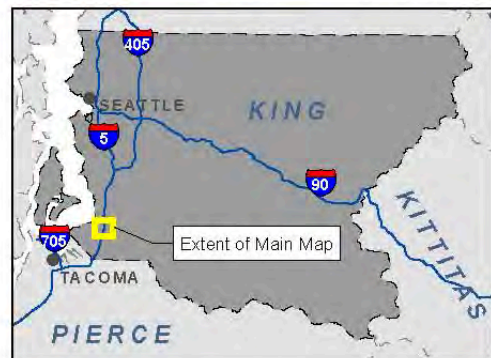
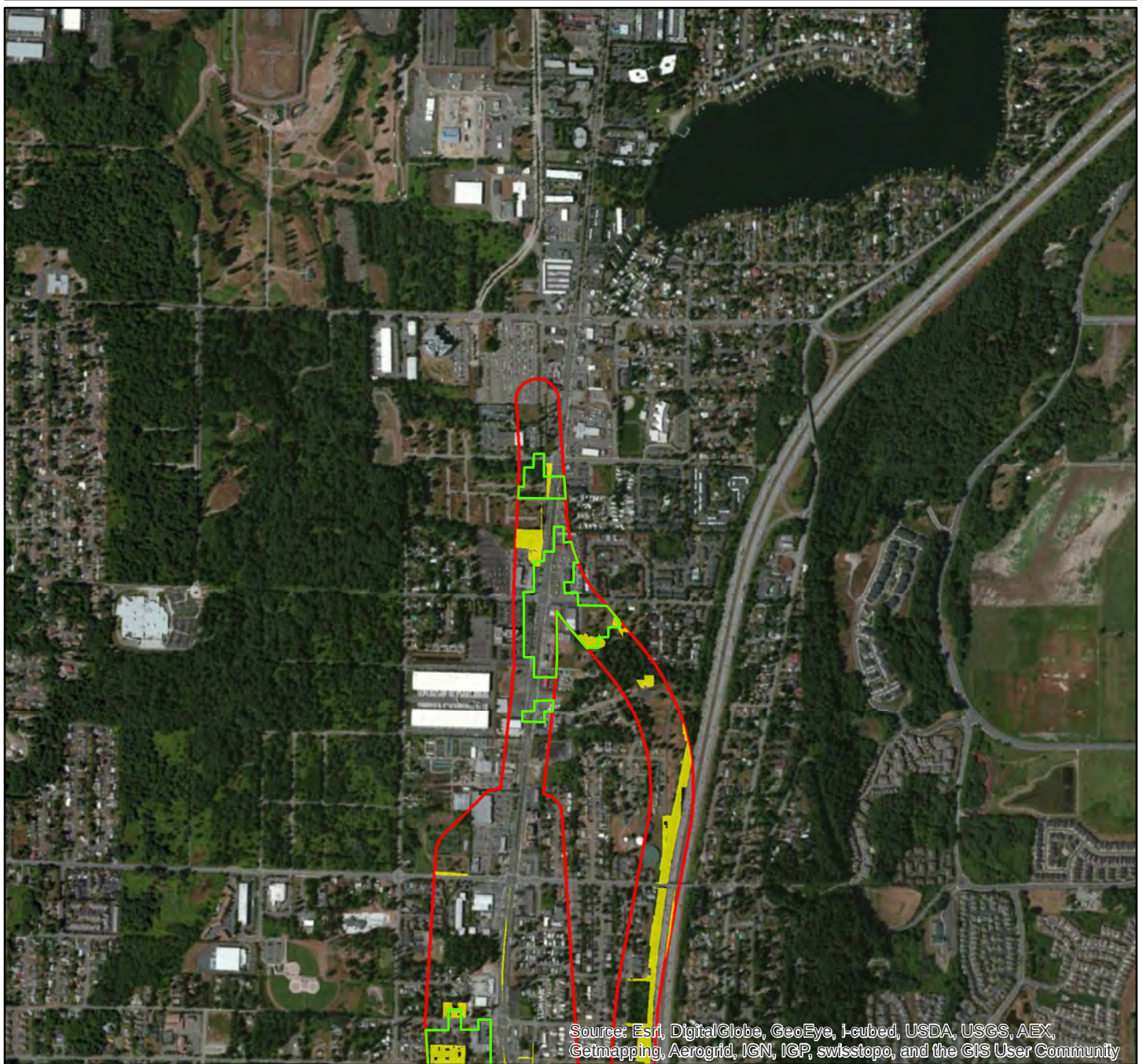


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:
 Statewide Predictive Model: Environmental Factors with Archaeological Resources Results. Washington Information System for Architectural and Archaeological Records Data, Department of Archaeology and Historic Preservation. 2014.
 Impervious/Impacted Surface Interpretation. King County GIS Center. 2009.

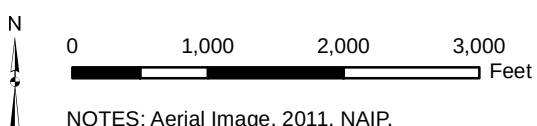
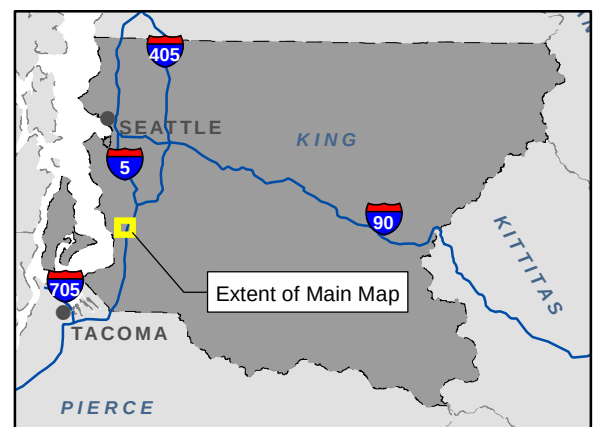
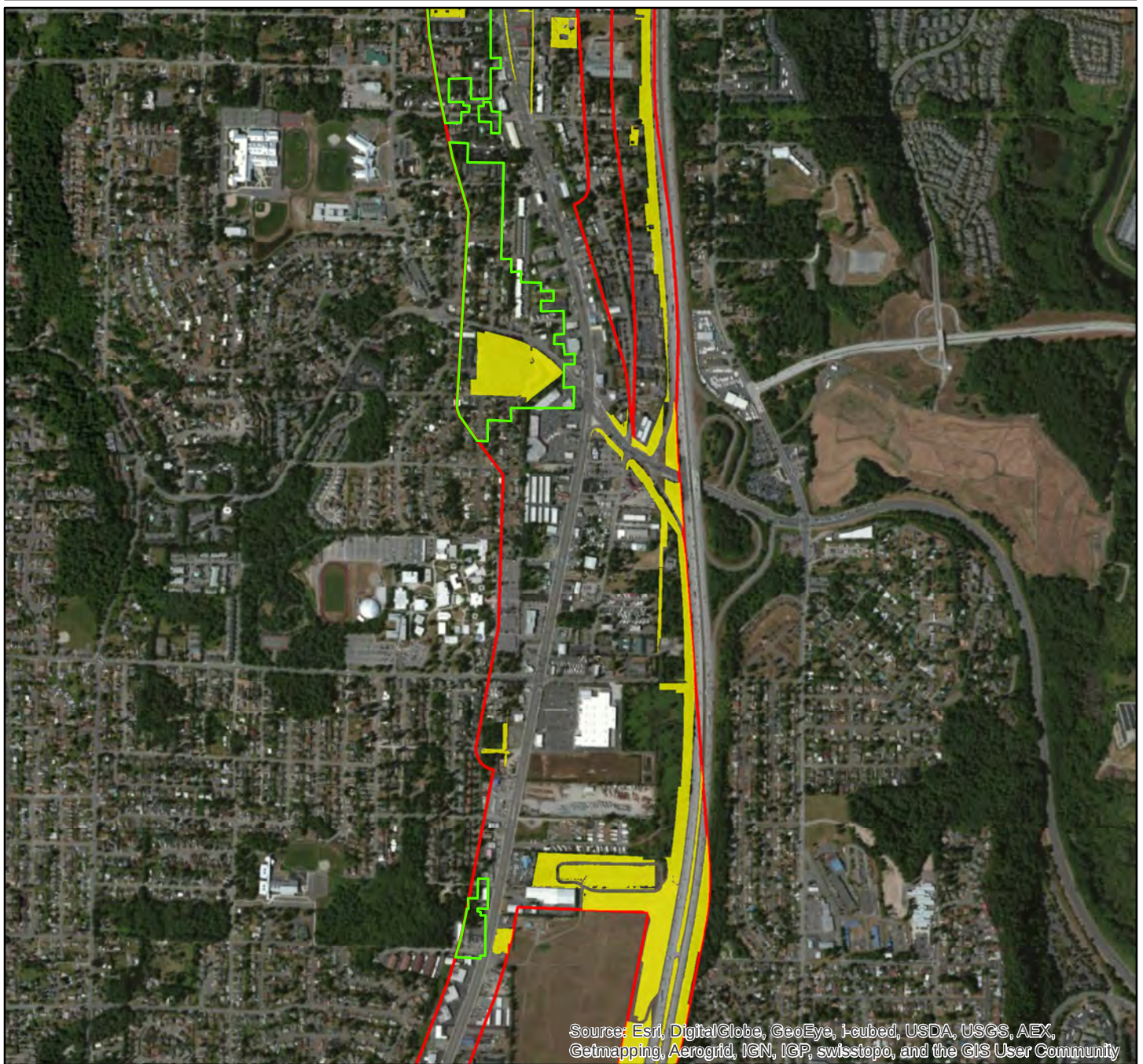


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:

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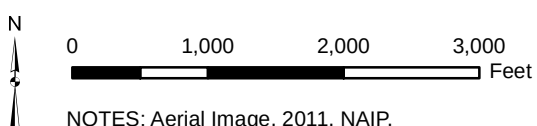
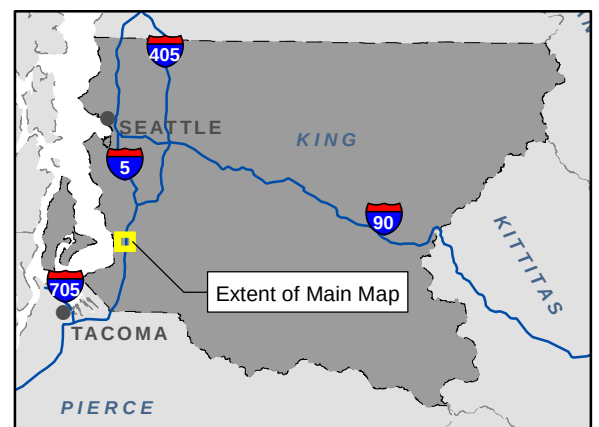
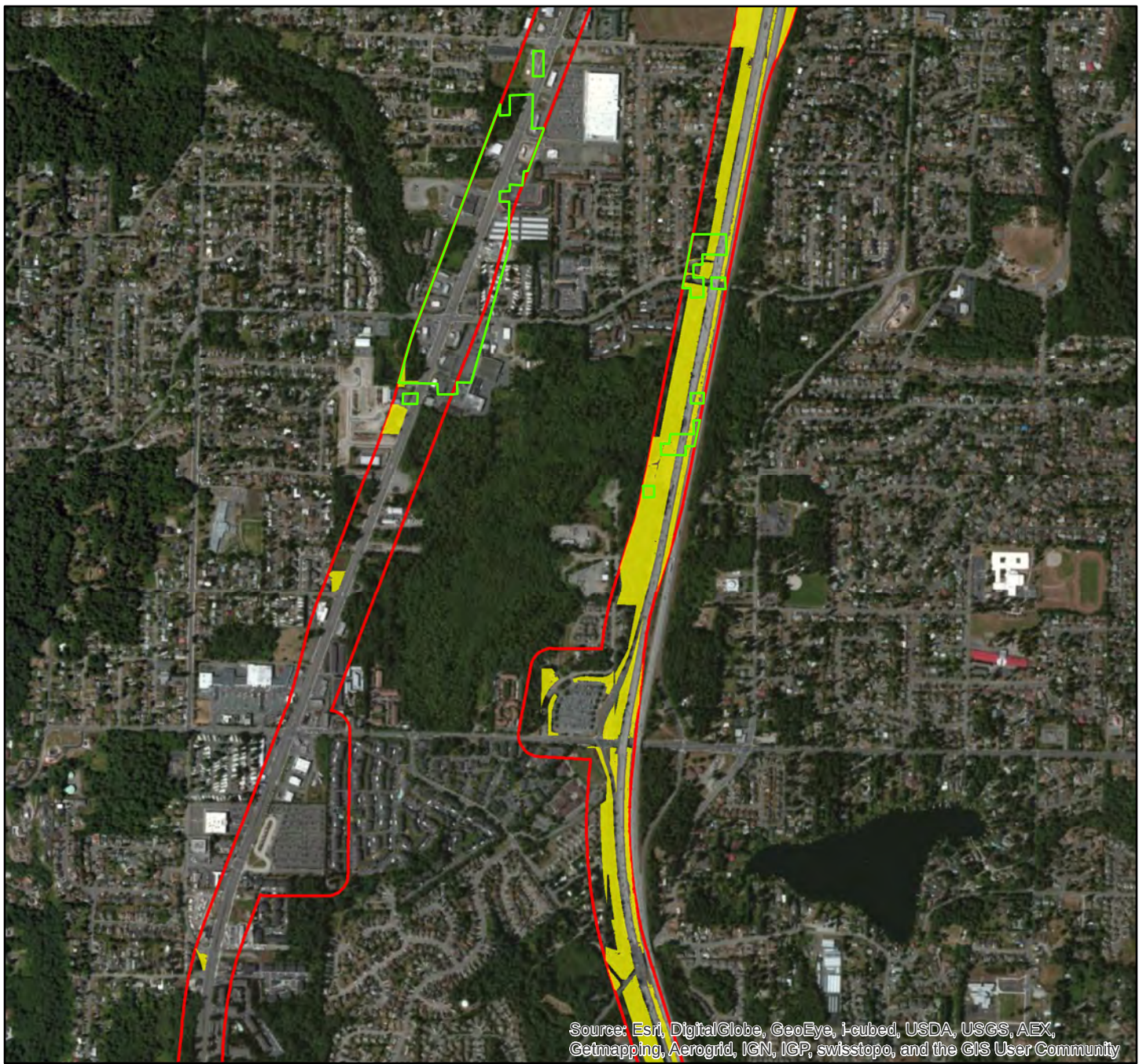


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

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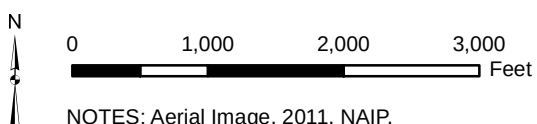
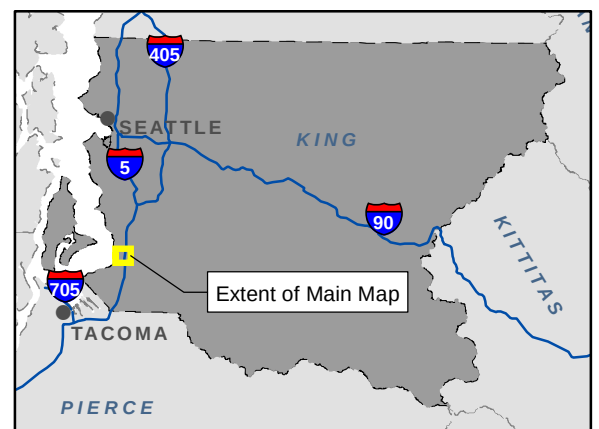
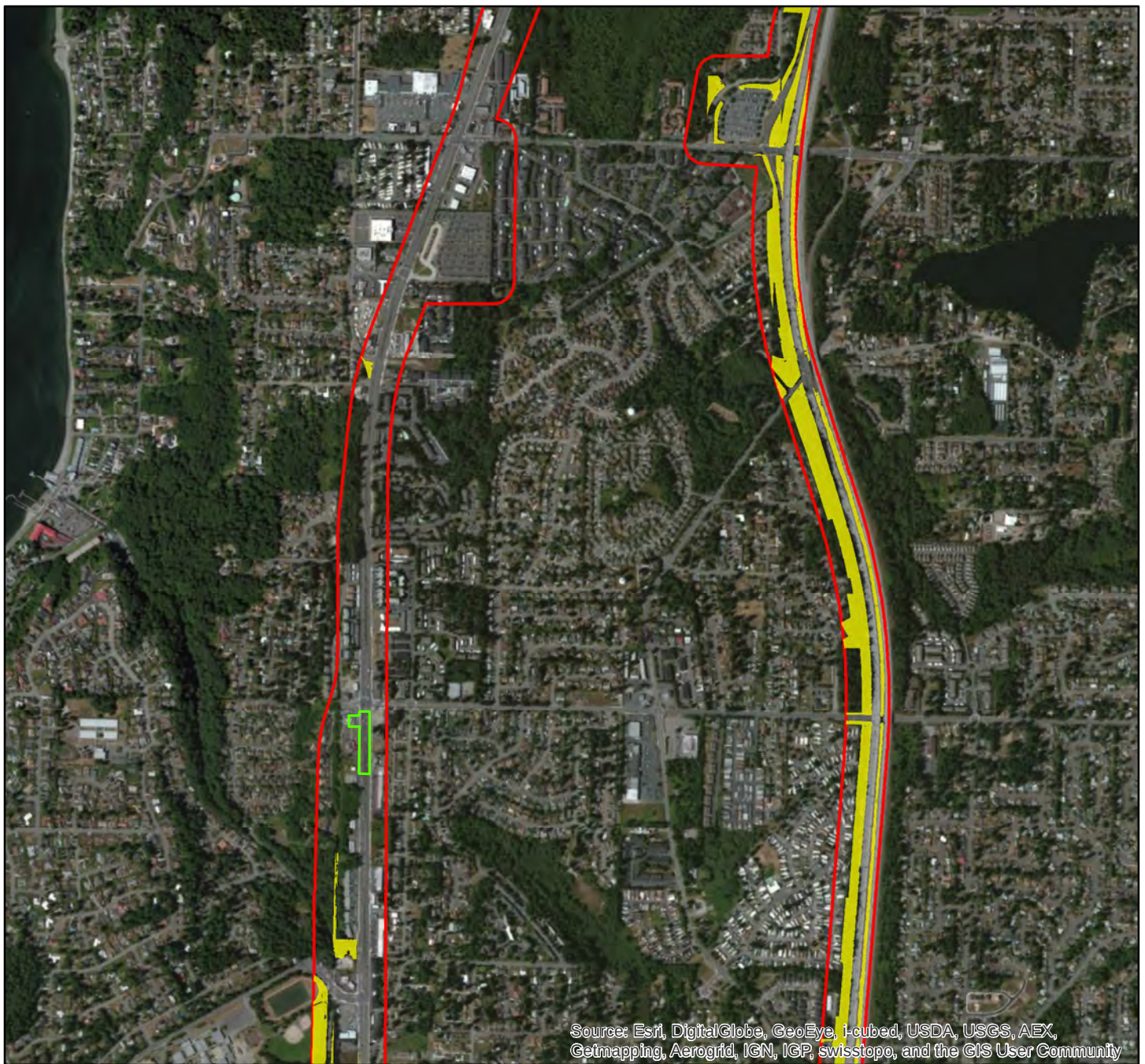


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Legend

- Area of Potential Effects (APE)
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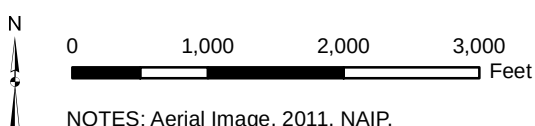
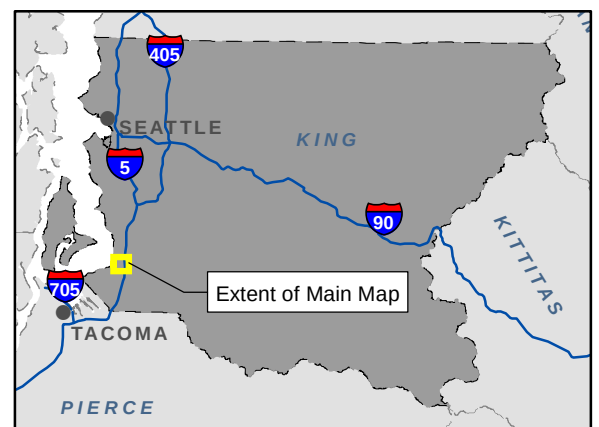
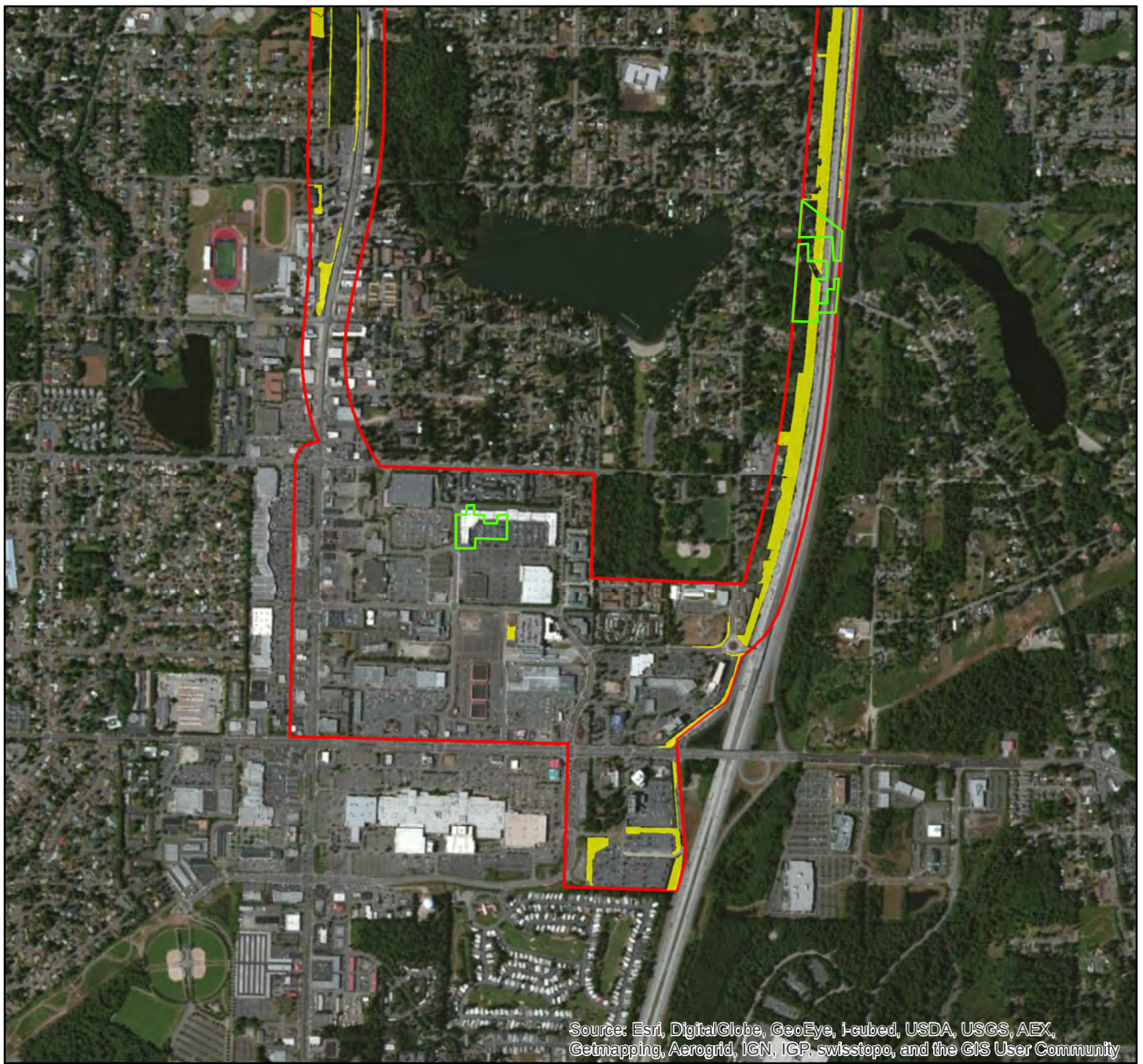


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 Federal Way Link Extension Project
 King County, WA



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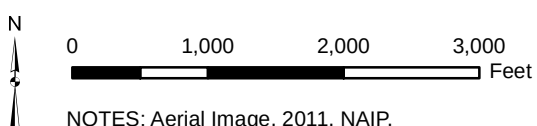
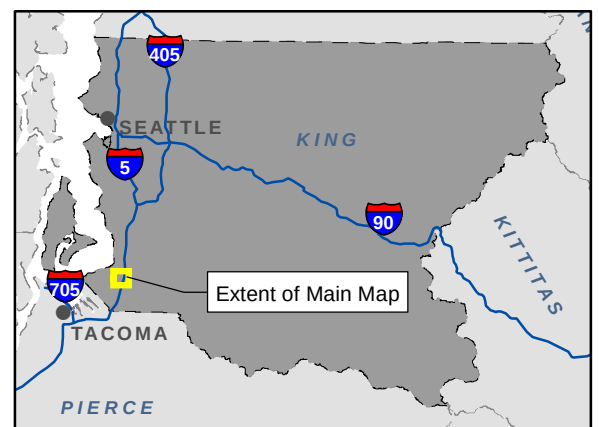


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA

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U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

April 2, 2014

Harry Smiskin
Tribal Chair
Confederated Tribes and Bands of the Yakama Nation
PO Box 151
Toppenish, WA 98948

**Re: Sound Transit Federal Way Link Extension
Area of Potential Effect & Archaeological Survey Plan**

The Honorable Harry Smiskin:

The Federal Transit Administration (FTA) initiated Section 106 consultation for the Sound Transit Federal Way Link Extension (FWLE), previously Federal Way Transit Extension, in June 2013. Since then, an area of potential effect (APE) and an archaeological survey plan have been developed for the project. The project and APE are described below. This letter invites your review and comments on the APE and the enclosed archaeological survey plan.

Project Description:

The FWLE Draft Environmental Impact Statement (EIS) will evaluate a set of light rail alignments and stations that would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The alternatives to be evaluated in the Draft EIS are described below.

- **SR 99 Alternative:** The SR 99 alternative would consist of light rail guideway along the SR 99 median except for transitioning to the west side or east side of the roadway to access the three baseline stations at South Kent-Des Moines Road, South 272nd Street, and the Federal Way Transit Center. Optional station locations for the Kent-Des Moines and Federal Way Transit Center stations will be evaluated. The SR 99 alternative also includes additional station locations in the vicinities of South 216th Street and South 260th Street. An alignment option along the west side of SR 99 in Federal Way will also be evaluated.
- **I-5 Alternative:** The I-5 alternative consists of light rail guideway along the south side of the proposed SR 509 right-of-way (ROW) directly to I-5, then proceeding along the west side of the I-5 ROW. The guideway deviates west from the I-5 ROW near 317th Street to access the Federal Way Transit Center area. There would be three baseline stations at Kent-Des Moines, South 272nd Street, and the Federal Way Transit Center. Optional station locations for the Kent-Des Moines and Federal

Way Transit Center stations will be evaluated. Additionally an alignment option that transitions to the I-5 median to avoid the Midway Landfill is to be evaluated.

- SR 99/I-5 Alternative: The SR 99 to I-5 alternative would be the same as the SR 99 alternative till approximately Kent-Des Moines Road. Here it would transition to the I-5 corridor, with the Kent-Des Moines Station being located near 30th Avenue South, directly South of South 240th Street, this alternative would be the same as the I-5 alternative.
- I-5/SR 99 Alternative: The I-5 to SR 99 alternative would be the same as the I-5 alternative to approximately Kent-Des Moines Road, where it would transition to the SR 99 corridor, with the Kent-Des Moines Station located near 30th Avenue South, directly South of South 240th Street; this alternative would be the same as the SR 99 alternative.

Area of Potential Effect

The APE extends 200 feet from each side of the center of the guideway alignments. It also includes a radius of approximately 200 feet from the outer limits of station locations and ancillary facilities. Specific locations and footprints for the Kent-Des Moines station, and the Federal Way Transit Center station have not been finalized. In these areas the APE includes the entirety of the area between Kent-Des Moines Road, South 240th Street, SR 99, and I-5; and most of the area between South 312th Street and South 320th Street in Federal Way (see Figure 1, page 3 and Figure 2, page 5). Excluded from consideration is part of Steel Lake Park.

The APE also includes the areas where the project could directly disturb prehistoric and historic-period archaeological resources. Although the locations of project elements are not precisely known at this stage of the project, they are anticipated to be within the 200 foot buffer around the project elements described above. Details regarding the depth of construction will vary by alternative and will be developed as the project continues through project review and design.

We look forward to your comments on the APE and the archaeological survey plan. So that we may move forward with the archaeological investigations, we respectfully request that you provide any comments within 30 days.

If you have any questions or need further information, please feel free to contact Steve Saxton, FTA, at 206-220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at 206-395-5103 or kent.hale@soundtransit.org.

Sincerely,



R.F. Krochalis
Regional Administrator

Enclosures: Archaeological Survey Plan

cc: Johnson Meninick, Confederated Tribes and Bands of the Yakama Nation
Matthew Sterner, DAHP
Kent Hale, Sound Transit

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Sound Transit Federal Way Link Extension

Research Design for Archaeological Fieldwork

Prepared by

Keith Mendez, M.A., CH2M HILL, Inc.

March 2014

1.0 Introduction

The Federal Transit Authority (FTA) and Sound Transit have proposed the Federal Way Link Extension (FWLE) project to expand the Sound Transit Link light rail system from SeaTac to the cities of Des Moines, Kent, and Federal Way in King County. The proposed project would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. Sound Transit is preparing an environmental impact statement (EIS) in compliance with the National Environmental Policy Act and the Washington State Environmental Policy Act. The Draft EIS is expected to be published in late 2014 or early 2015. Following public and agency comments on the Draft EIS, the Sound Transit Board will identify a Preferred Alternative. The Final EIS will evaluate the Preferred Alternative further, and following publication of the Final EIS and issuance of the Record of Decision (ROD) by FTA, the Sound Transit Board will identify the project to be built. Final design and right-of-way acquisition will not occur until after the ROD and board decision.

Section 106 consultation was initiated with the Washington State Department of Archaeology and Historic Preservation (DAHP), the federally-recognized Muckleshoot, Puyallup, Snoqualmie, Stillaguamish, Suquamish, and Yakama tribes, and the non-federally recognized Duwamish and Snohomish tribes on June 13, 2013. DAHP concurred with the Area of Potential Effect (APE) notification on December 30, 2013. An archaeological survey will be employed to meet the reasonable and good faith effort identification requirements of Section 106 and the Washington State Standards for Cultural Resource Reporting. This document outlines the methodology that will be employed during this effort.

2.0 Project Location

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
Township 21 N, Range 4 E
Sections 4, 5, 8, 9, & 16
Township 22 N, Range 4 E
Sections 4, 9, 10, 15, 16, 21, 22, 28, 32, & 33

3.0 Research Design

The archaeological survey is intended to gather information in two phases about the historic and pre-contact archaeological record. The purpose of the research design is to provide a methodology for conducting the survey, inventory, data collection, and report preparation.

The Phase I field work will include a reconnaissance level survey of the footprint of the design alternatives, and subsurface testing of areas of interest to identify archaeological sites. Phase II field work would include additional archaeological excavation that might be needed to evaluate properties for inclusion in the National Register of Historic Places if any such properties are identified during Phase I.

Phase I will occur during preparation of the Draft EIS within public right-of-way and publicly owned parcels where access has been granted. For all other parcels (public and private), only the reconnaissance survey will be completed prior to the Draft EIS. Areas identified for a more intensive Phase I survey will be surveyed after the Preferred Alternative has been identified and before the Final EIS, where access can be obtained. If access to these parcels cannot be obtained prior to the Final EIS, the more intensive survey will occur during final design once the property has been acquired by Sound Transit. If areas requiring a Phase II survey are identified prior to the Final EIS, this survey will be completed and a determination of eligibility will be submitted to DAHP.

4.0 Preliminary Information

The APE has been defined to include all design alternatives to be included in the Draft EIS (Figure 1). Impervious surface data were received from King County and overlaid on the APE to identify all portions of the APE that contain impervious surfaces such as roads, parking lots, or buildings. This information was examined to identify portions of the APE that could be inspected for the presence of historic properties (Figure 2). Out of a total APE containing 1,261 acres, impervious surfaces account for 565 acres. The remaining 696 acres include parcels in public and private ownership. This investigation examines only those parcels in public ownership that are not identified as impervious, which account for approximately 187.37 acres.

5.0 Field Methodology

The Phase I fieldwork will include an archaeological survey consisting of background research of areas recently surveyed, review of the statewide predictive model provided by DAHP, a review of available geologic information from geotechnical borings and the Washington State Department of Natural Resources, and a reconnaissance level survey of portions of the APE that contain native sediments and have not been surveyed within the past 5 years. The reconnaissance survey will include inspecting portions of the APE to identify locations appropriate for further archaeological investigations, or Areas of Interest (AOIs).

Once AOIs are identified, an archaeological survey will be conducted in accordance with the guidelines provided by DAHP. Crew members will survey in parallel linear transects spaced no more than 30 meters (98 feet) apart. Any cultural materials identified will be documented and photographed. It is expected that where the ground is not covered in impermeable surfaces (asphalt, concrete, or compacted gravel), ground surfaces will be obscured by vegetation. At the discretion of the Project Archaeologist, locations will be identified where subsurface test units (STUs) may be employed to sample sediments in these areas. STUs will be excavated minimally to 60 centimeters (cm) (2 feet) below the ground surface or until obstructed. All sediments will be screened through a 0.6-cm (1/4-inch) wire mesh screen. If buried cultural materials are encountered in any STU, one STU will be excavated up to 4.5 meters (15 feet) away in each cardinal direction (north, south, east, and west) to establish site boundaries without intruding on impervious surfaces, or areas outside of the APE. Where access and site conditions allow, this method will be employed until two adjacent sterile STUs are encountered. Field documentation will include descriptions of the stratigraphic profile, soil type descriptions, and descriptions of any cultural

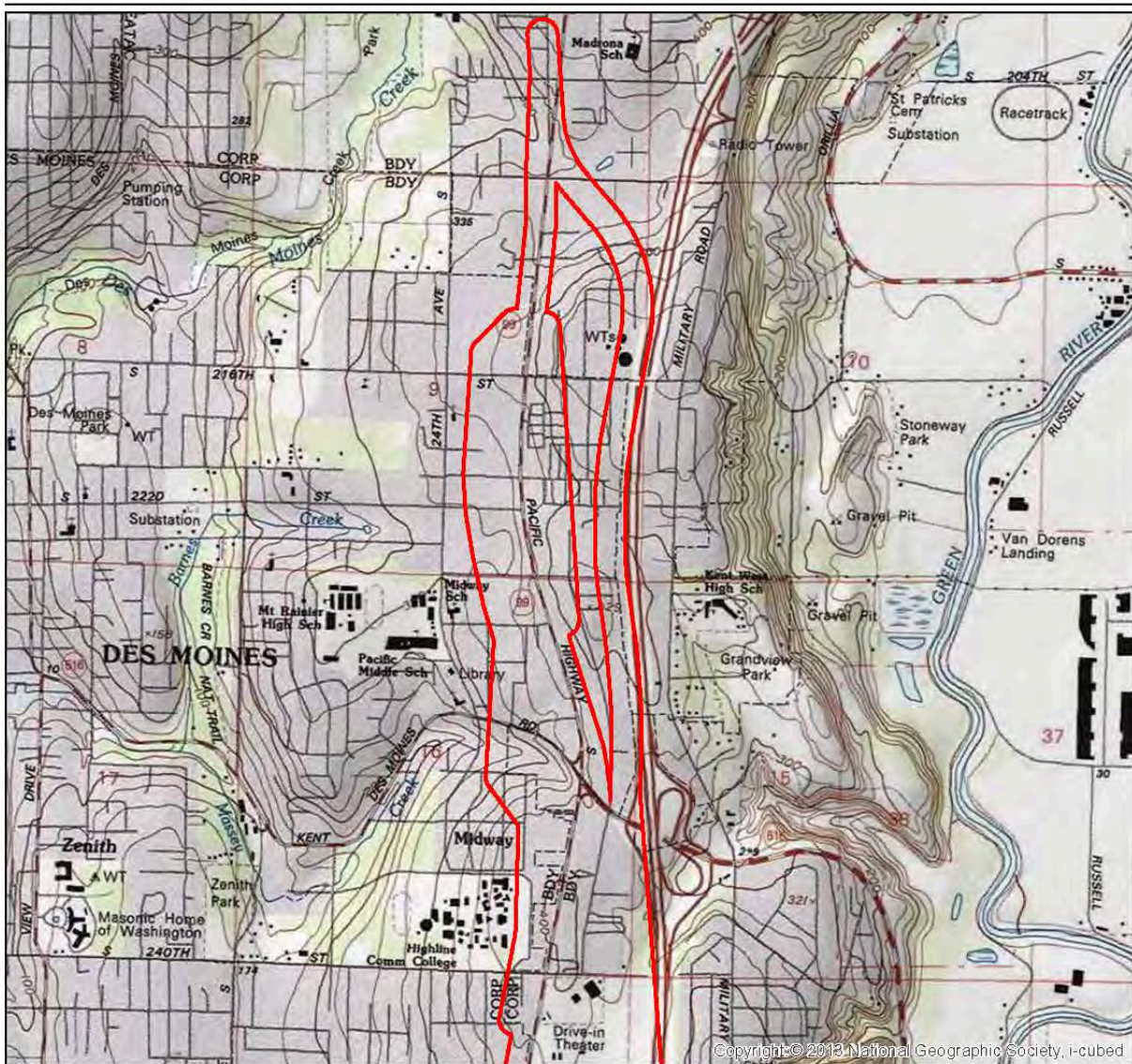
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Once site boundaries have been established, the information gathered will be used to complete a Washington State Site or Isolate Inventory Form, as appropriate. Recommendations for site eligibility will be provided where possible, but this phase does not include formal Phase II evaluations that include completion of National Register Evaluation Forms. Per Washington State law (Revised Code of Washington 19.122 E2SHB 1634), it is assumed that utility locates will be conducted prior to the initiation of any subsurface archaeological testing. If no potentially eligible archaeological sites are discovered in the course of the survey, no additional fieldwork (Phase II) will be required. If potentially eligible archaeological sites are discovered, formal Phase II investigations may be recommended. Phase II investigations (evaluations) will be conducted once the Preferred Alternative is identified where potentially National Register eligible sites that cannot be avoided are discovered. A Phase II survey plan will be prepared if and when necessary.

6.0 Report

The results of the archaeological survey will be incorporated into the FWLE Historic and Archaeological Resources Technical Report completed for this undertaking. The results from Phase 1 on accessible properties will be incorporated into the version of this technical report released with the Draft EIS. The results from any additional properties where access will be gained between the Draft EIS and the Final EIS will be incorporated into the version of this technical report released with the Final EIS.

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Legend

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 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33



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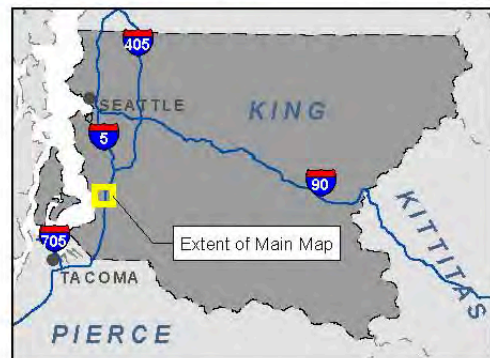
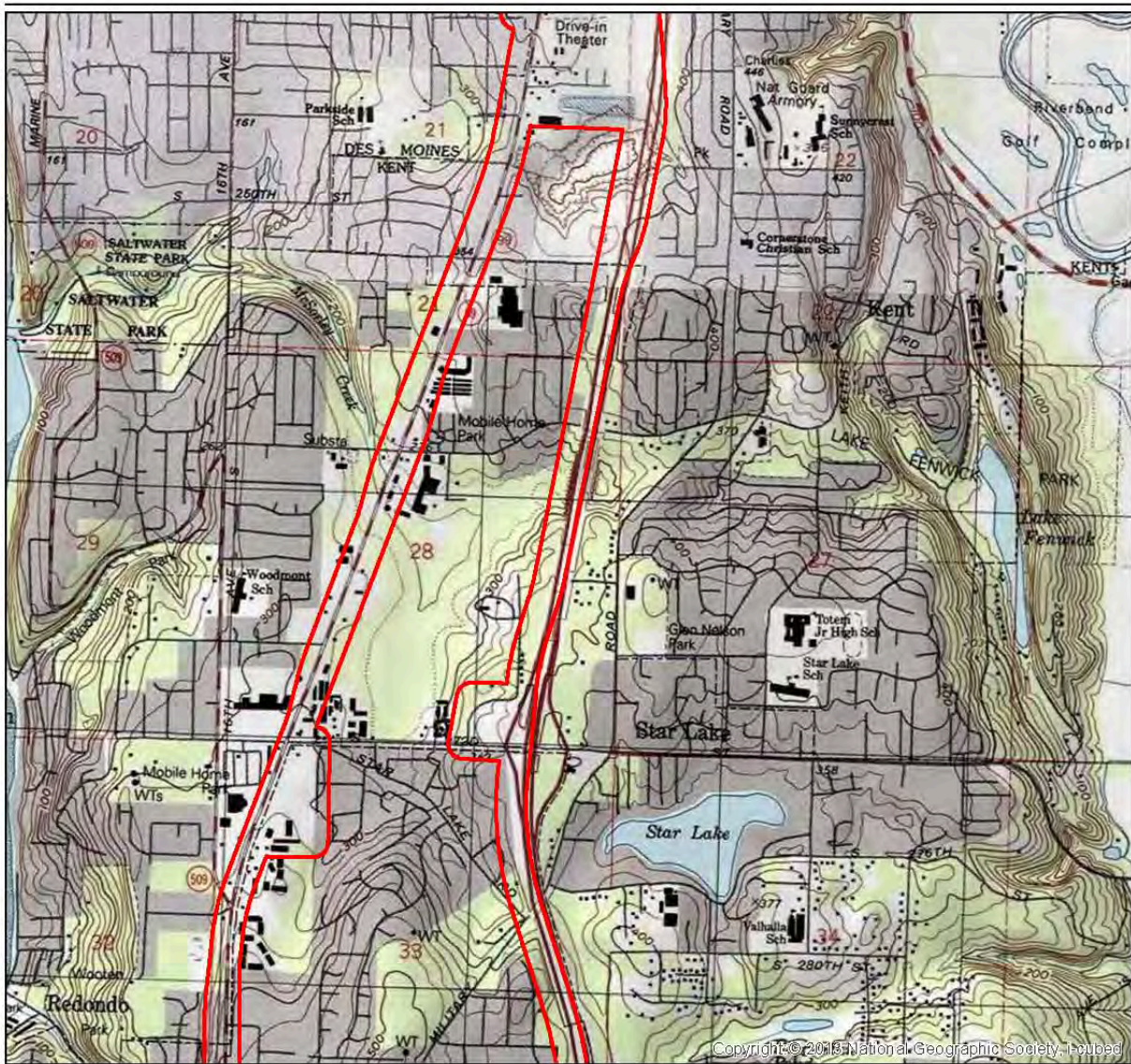


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
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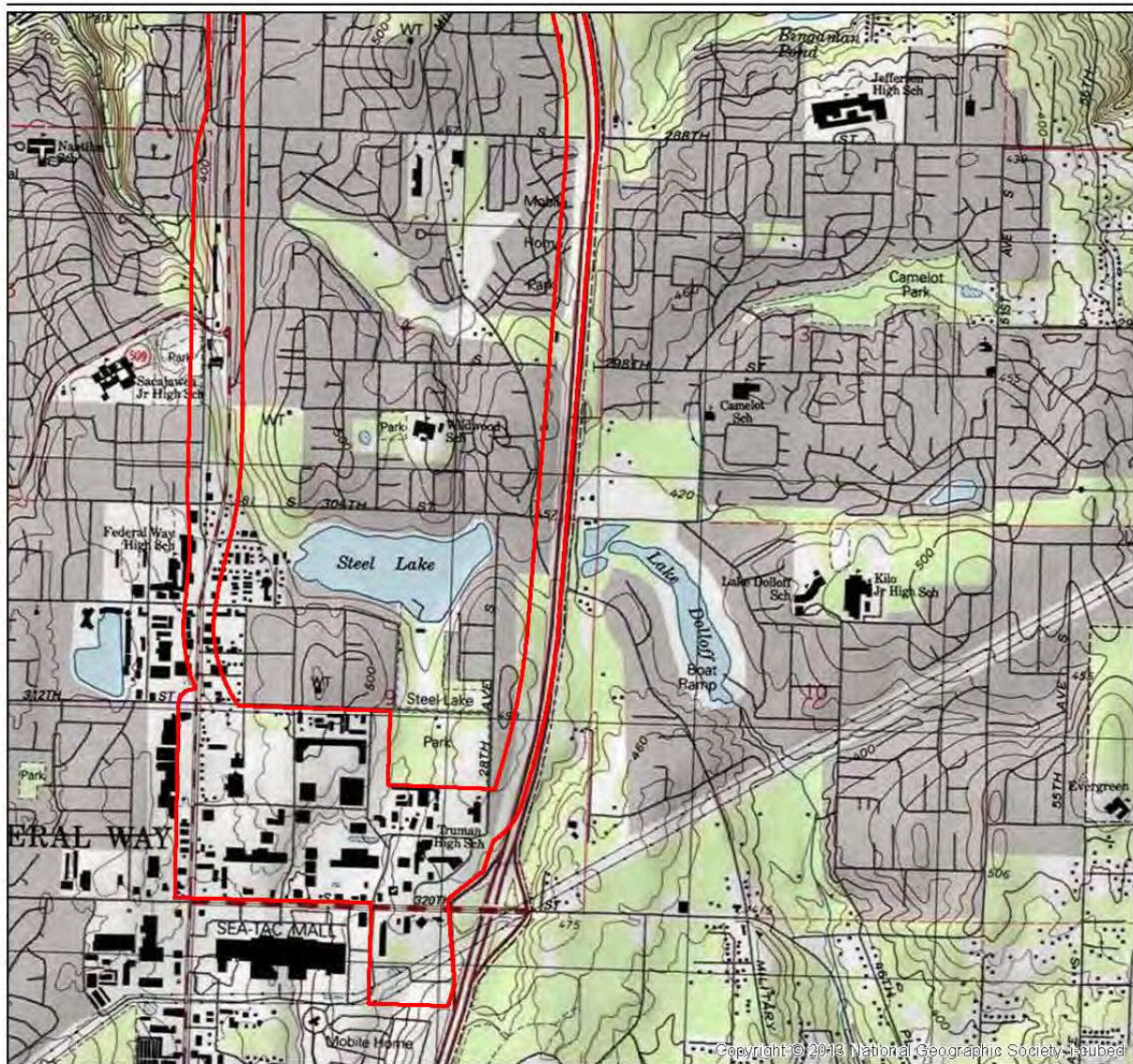


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FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

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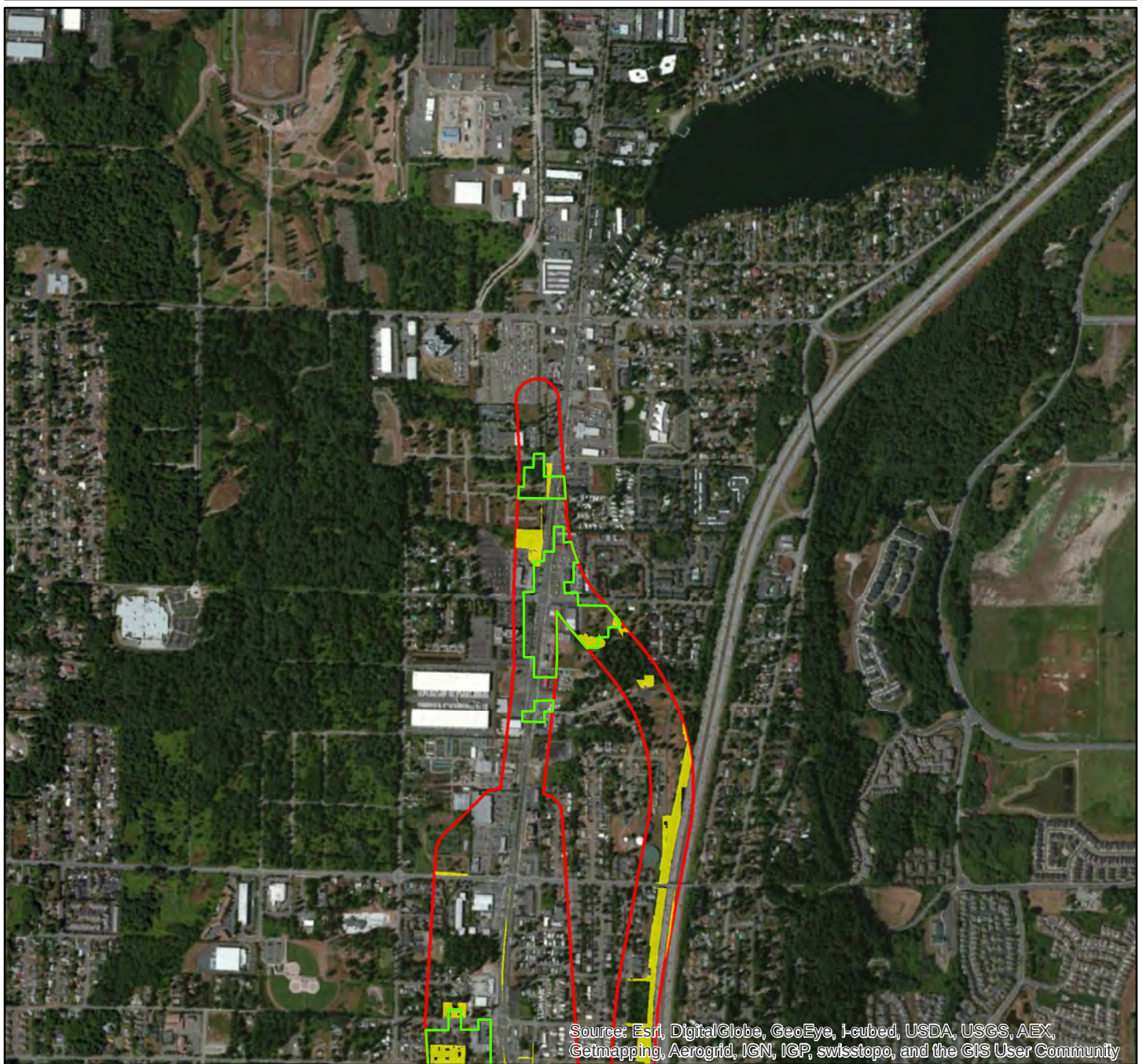


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FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

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Sources:
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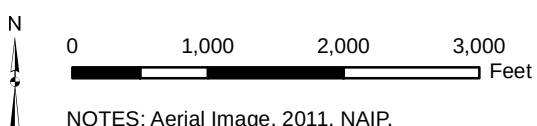
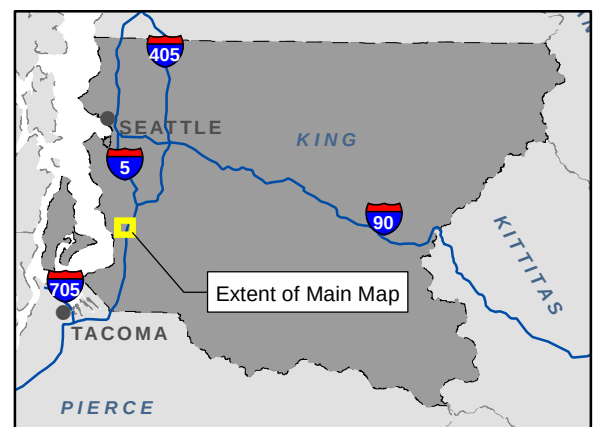
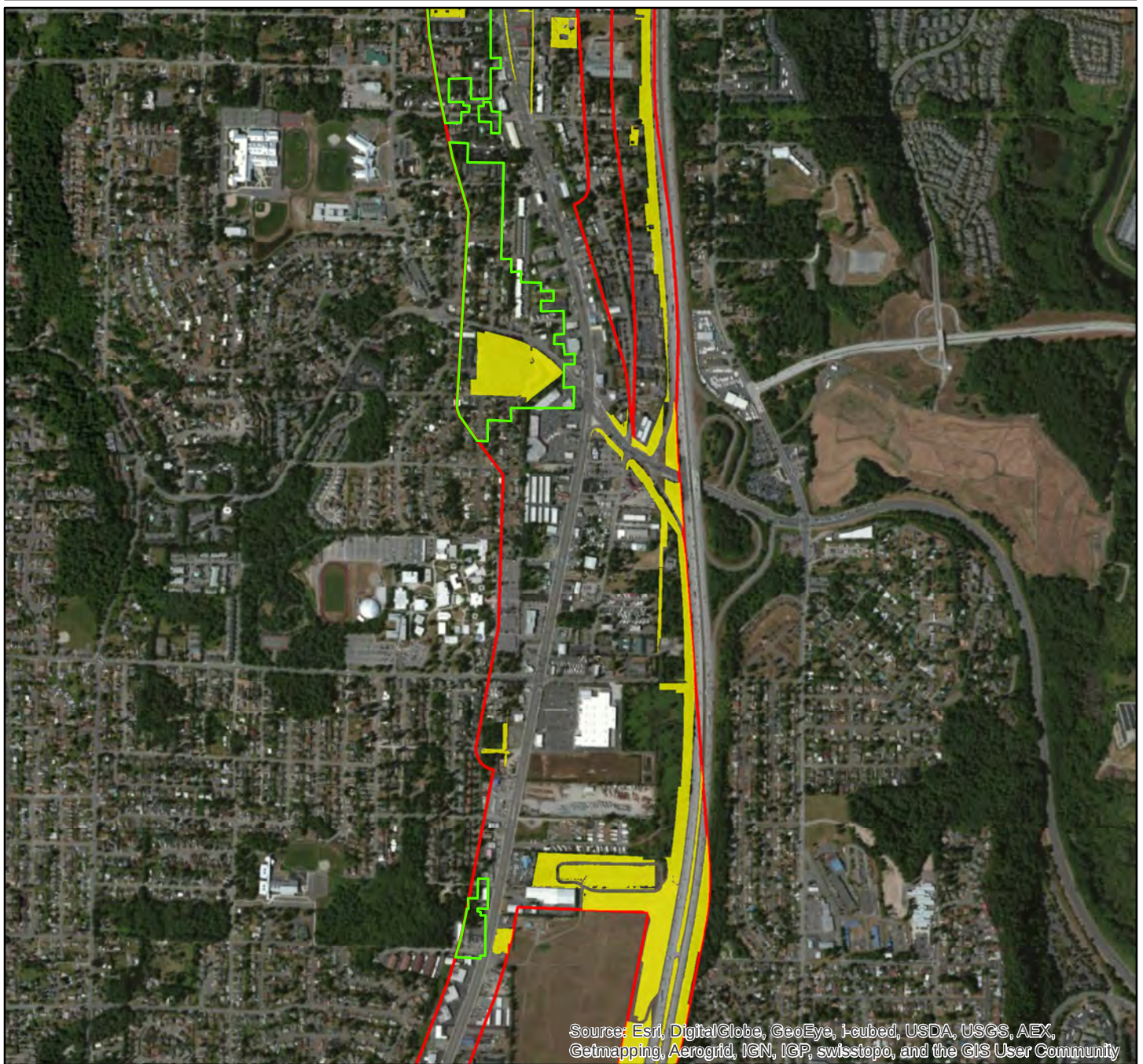


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



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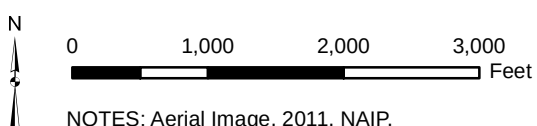
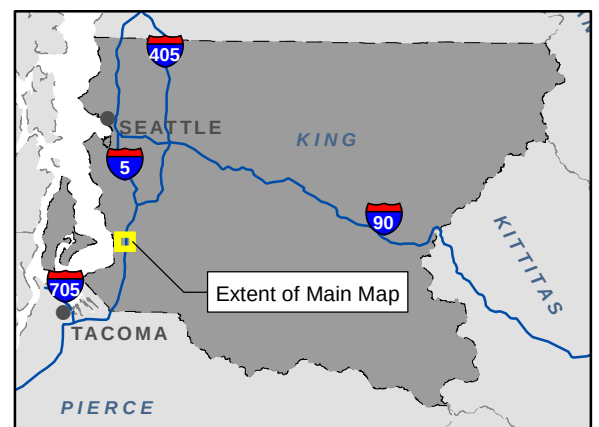
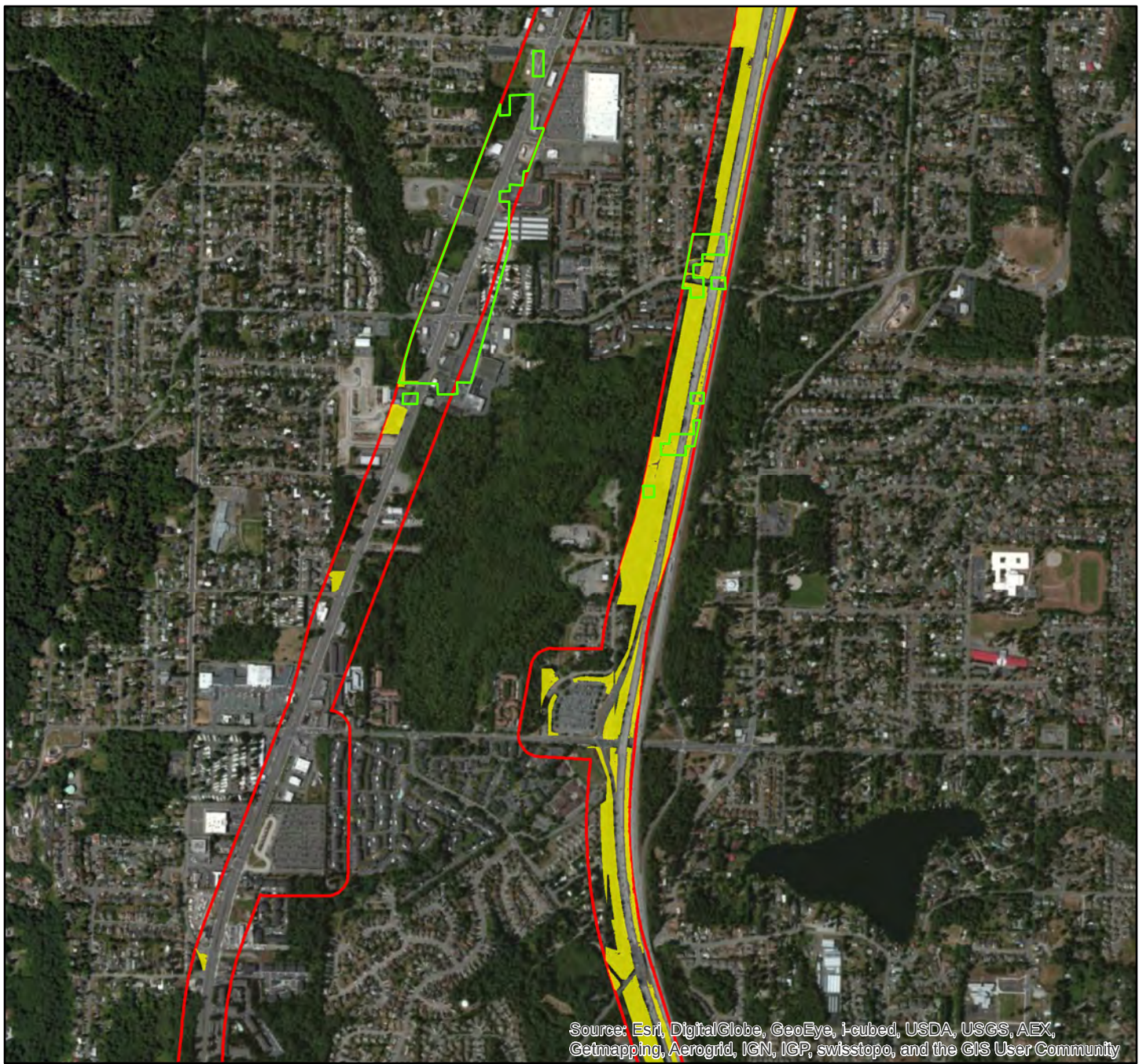


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Legend

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- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:

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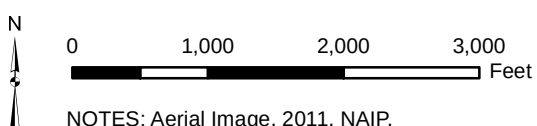
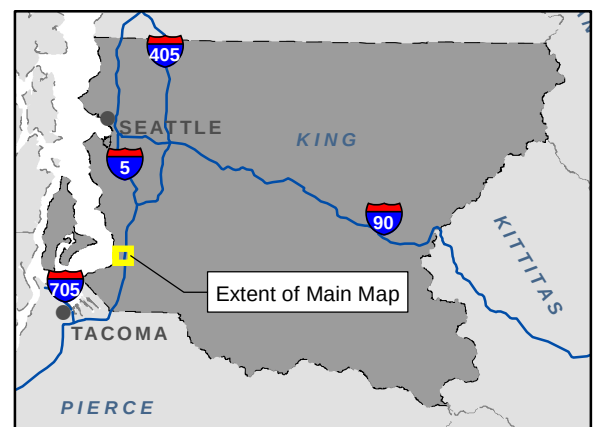
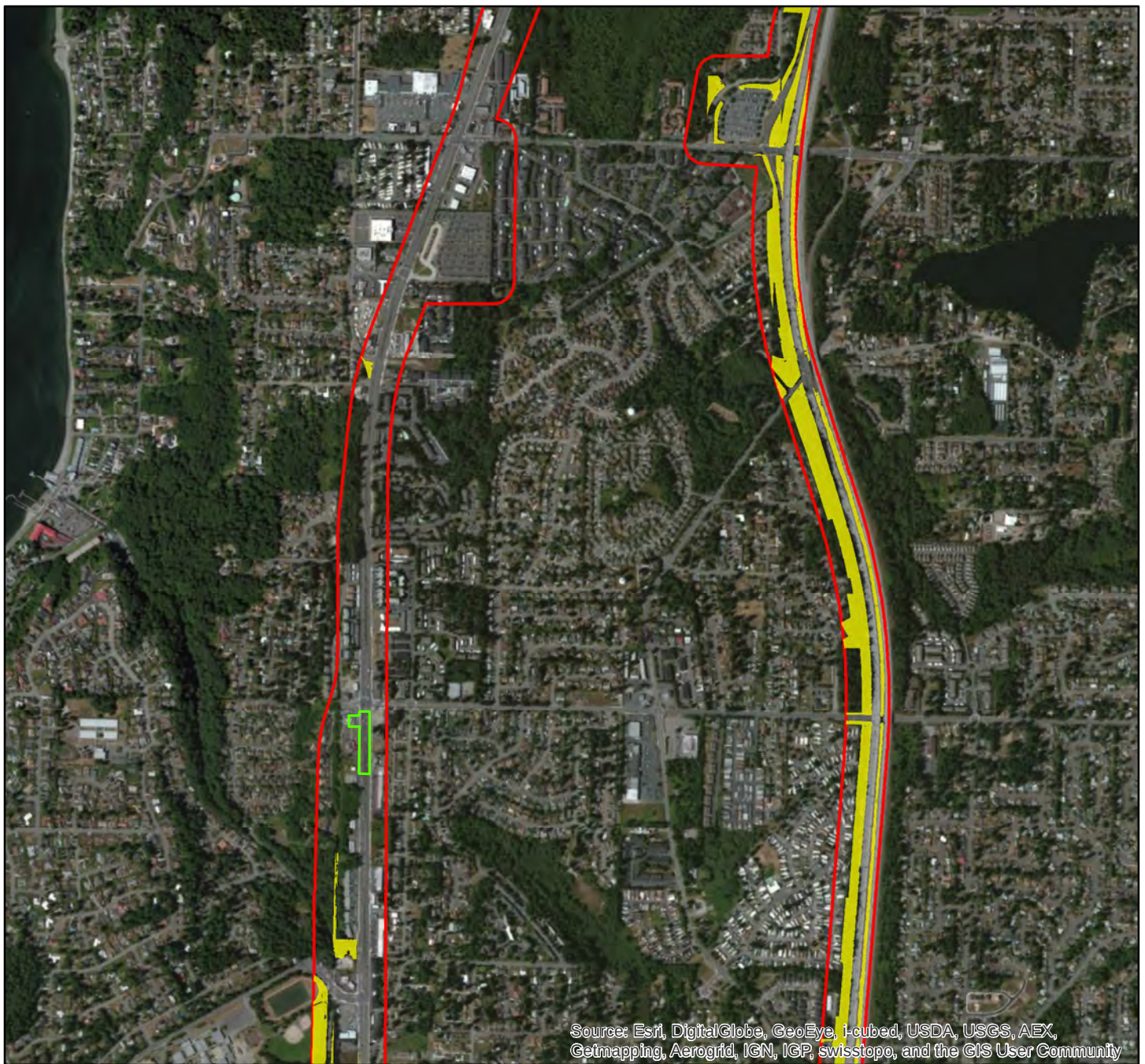


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

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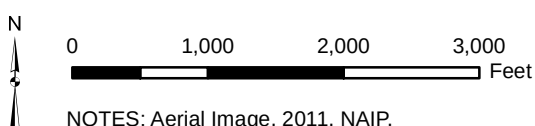
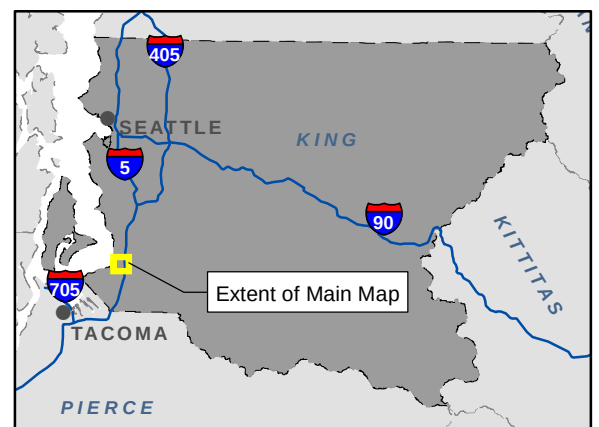
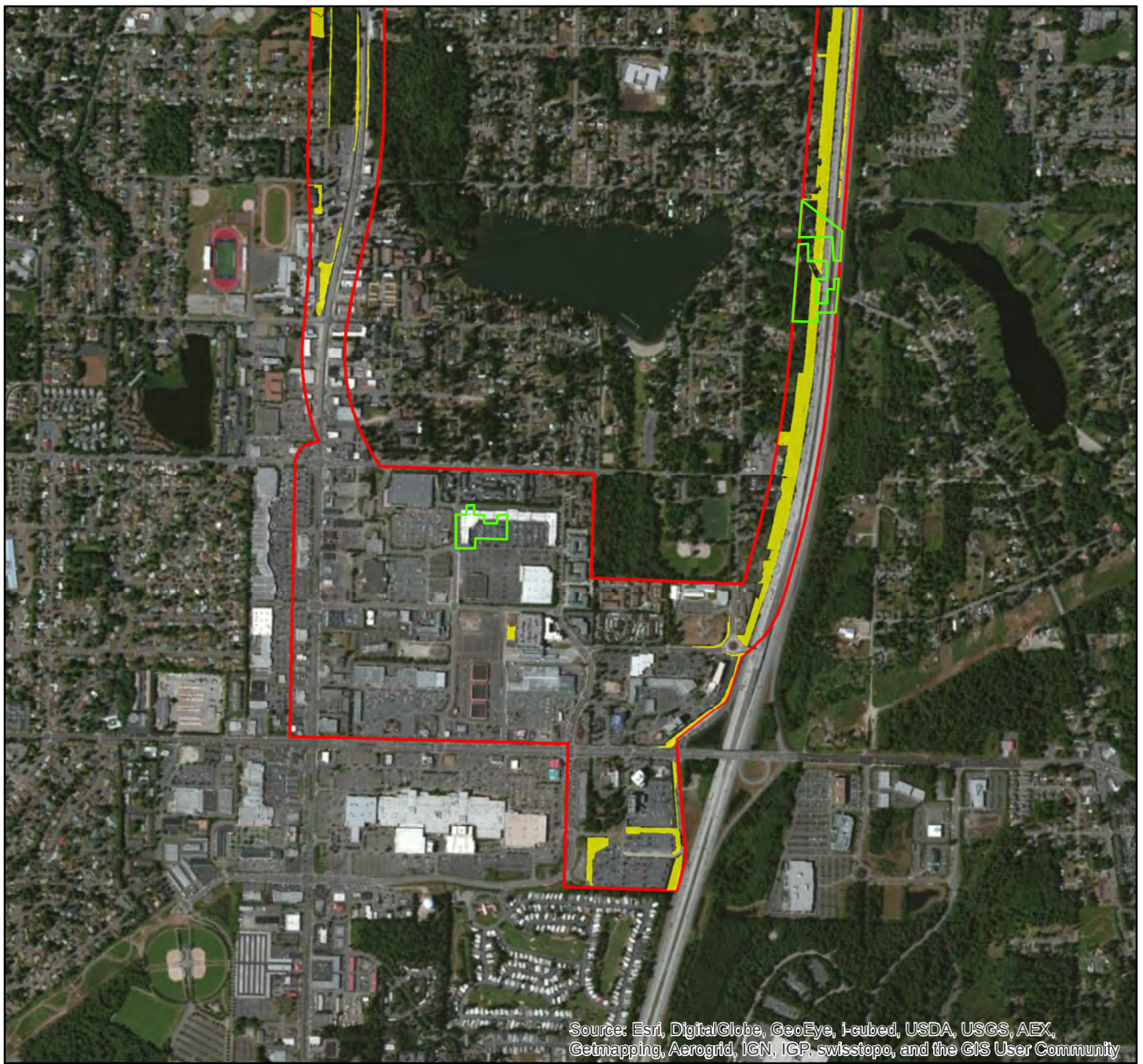


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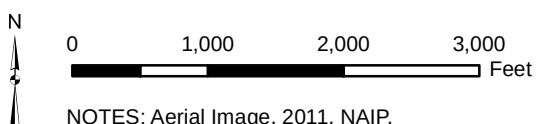
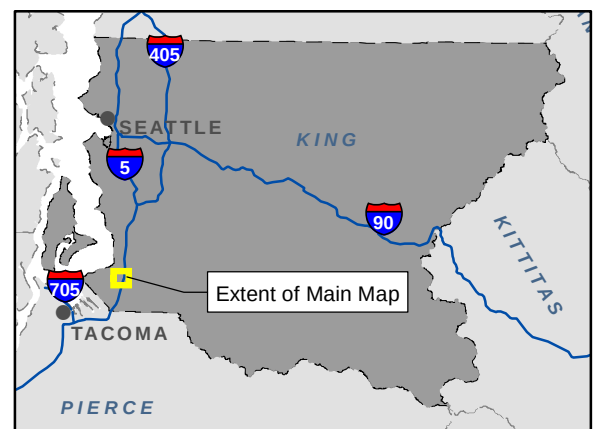


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 Federal Way Link Extension Project
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U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

April 2, 2014

Shawn Yanity
Chairman
Stillaguamish Tribe of Indians
3310 Smokey Point Drive
Arlington, WA 98223

**Re: Sound Transit Federal Way Link Extension
Area of Potential Effect & Archaeological Survey Plan**

The Honorable Shawn Yanity:

The Federal Transit Administration (FTA) initiated Section 106 consultation for the Sound Transit Federal Way Link Extension (FWLE), previously Federal Way Transit Extension, in June 2013. Since then, an area of potential effect (APE) and an archaeological survey plan have been developed for the project. The project and APE are described below. This letter invites your review and comments on the APE and the enclosed archaeological survey plan.

Project Description:

The FWLE Draft Environmental Impact Statement (EIS) will evaluate a set of light rail alignments and stations that would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The alternatives to be evaluated in the Draft EIS are described below.

- **SR 99 Alternative:** The SR 99 alternative would consist of light rail guideway along the SR 99 median except for transitioning to the west side or east side of the roadway to access the three baseline stations at South Kent-Des Moines Road, South 272nd Street, and the Federal Way Transit Center. Optional station locations for the Kent-Des Moines and Federal Way Transit Center stations will be evaluated. The SR 99 alternative also includes additional station locations in the vicinities of South 216th Street and South 260th Street. An alignment option along the west side of SR 99 in Federal Way will also be evaluated.
- **I-5 Alternative:** The I-5 alternative consists of light rail guideway along the south side of the proposed SR 509 right-of-way (ROW) directly to I-5, then proceeding along the west side of the I-5 ROW. The guideway deviates west from the I-5 ROW near 317th Street to access the Federal Way Transit Center area. There would be three baseline stations at Kent-Des Moines, South 272nd Street, and the Federal Way Transit Center. Optional station locations for the Kent-Des Moines and Federal

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Area of Potential Effect

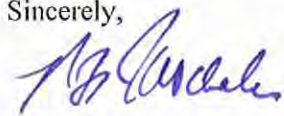
The APE extends 200 feet from each side of the center of the guideway alignments. It also includes a radius of approximately 200 feet from the outer limits of station locations and ancillary facilities. Specific locations and footprints for the Kent-Des Moines station, and the Federal Way Transit Center station have not been finalized. In these areas the APE includes the entirety of the area between Kent-Des Moines Road, South 240th Street, SR 99, and I-5; and most of the area between South 312th Street and South 320th Street in Federal Way (see Figure 1, page 3 and Figure 2, page 5). Excluded from consideration is part of Steel Lake Park.

The APE also includes the areas where the project could directly disturb prehistoric and historic-period archaeological resources. Although the locations of project elements are not precisely known at this stage of the project, they are anticipated to be within the 200 foot buffer around the project elements described above. Details regarding the depth of construction will vary by alternative and will be developed as the project continues through project review and design.

We look forward to your comments on the APE and the archaeological survey plan. So that we may move forward with the archaeological investigations, we respectfully request that you provide any comments within 30 days.

If you have any questions or need further information, please feel free to contact Steve Saxton, FTA, at 206-220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at 206-395-5103 or kent.hale@soundtransit.org.

Sincerely,



R.F. Krochalis
Regional Administrator

Enclosures: Archaeological Survey Plan

cc: Kerry Lyste, Stillaguamish Tribe of Indians
Matthew Sterner, DAHP
Kent Hale, Sound Transit

Sound Transit Federal Way Link Extension

Research Design for Archaeological Fieldwork

Prepared by

Keith Mendez, M.A., CH2M HILL, Inc.

March 2014

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1.0 Introduction

The Federal Transit Authority (FTA) and Sound Transit have proposed the Federal Way Link Extension (FWLE) project to expand the Sound Transit Link light rail system from SeaTac to the cities of Des Moines, Kent, and Federal Way in King County. The proposed project would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. Sound Transit is preparing an environmental impact statement (EIS) in compliance with the National Environmental Policy Act and the Washington State Environmental Policy Act. The Draft EIS is expected to be published in late 2014 or early 2015. Following public and agency comments on the Draft EIS, the Sound Transit Board will identify a Preferred Alternative. The Final EIS will evaluate the Preferred Alternative further, and following publication of the Final EIS and issuance of the Record of Decision (ROD) by FTA, the Sound Transit Board will identify the project to be built. Final design and right-of-way acquisition will not occur until after the ROD and board decision.

Section 106 consultation was initiated with the Washington State Department of Archaeology and Historic Preservation (DAHP), the federally-recognized Muckleshoot, Puyallup, Snoqualmie, Stillaguamish, Suquamish, and Yakama tribes, and the non-federally recognized Duwamish and Snohomish tribes on June 13, 2013. DAHP concurred with the Area of Potential Effect (APE) notification on December 30, 2013. An archaeological survey will be employed to meet the reasonable and good faith effort identification requirements of Section 106 and the Washington State Standards for Cultural Resource Reporting. This document outlines the methodology that will be employed during this effort.

2.0 Project Location

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
Township 21 N, Range 4 E
Sections 4, 5, 8, 9, & 16
Township 22 N, Range 4 E
Sections 4, 9, 10, 15, 16, 21, 22, 28, 32, & 33

3.0 Research Design

The archaeological survey is intended to gather information in two phases about the historic and pre-contact archaeological record. The purpose of the research design is to provide a methodology for conducting the survey, inventory, data collection, and report preparation.

The Phase I field work will include a reconnaissance level survey of the footprint of the design alternatives, and subsurface testing of areas of interest to identify archaeological sites. Phase II field work would include additional archaeological excavation that might be needed to evaluate properties for inclusion in the National Register of Historic Places if any such properties are identified during Phase I.

Phase I will occur during preparation of the Draft EIS within public right-of-way and publicly owned parcels where access has been granted. For all other parcels (public and private), only the reconnaissance survey will be completed prior to the Draft EIS. Areas identified for a more intensive Phase I survey will be surveyed after the Preferred Alternative has been identified and before the Final EIS, where access can be obtained. If access to these parcels cannot be obtained prior to the Final EIS, the more intensive survey will occur during final design once the property has been acquired by Sound Transit. If areas requiring a Phase II survey are identified prior to the Final EIS, this survey will be completed and a determination of eligibility will be submitted to DAHP.

4.0 Preliminary Information

The APE has been defined to include all design alternatives to be included in the Draft EIS (Figure 1). Impervious surface data were received from King County and overlaid on the APE to identify all portions of the APE that contain impervious surfaces such as roads, parking lots, or buildings. This information was examined to identify portions of the APE that could be inspected for the presence of historic properties (Figure 2). Out of a total APE containing 1,261 acres, impervious surfaces account for 565 acres. The remaining 696 acres include parcels in public and private ownership. This investigation examines only those parcels in public ownership that are not identified as impervious, which account for approximately 187.37 acres.

5.0 Field Methodology

The Phase I fieldwork will include an archaeological survey consisting of background research of areas recently surveyed, review of the statewide predictive model provided by DAHP, a review of available geologic information from geotechnical borings and the Washington State Department of Natural Resources, and a reconnaissance level survey of portions of the APE that contain native sediments and have not been surveyed within the past 5 years. The reconnaissance survey will include inspecting portions of the APE to identify locations appropriate for further archaeological investigations, or Areas of Interest (AOIs).

Once AOIs are identified, an archaeological survey will be conducted in accordance with the guidelines provided by DAHP. Crew members will survey in parallel linear transects spaced no more than 30 meters (98 feet) apart. Any cultural materials identified will be documented and photographed. It is expected that where the ground is not covered in impermeable surfaces (asphalt, concrete, or compacted gravel), ground surfaces will be obscured by vegetation. At the discretion of the Project Archaeologist, locations will be identified where subsurface test units (STUs) may be employed to sample sediments in these areas. STUs will be excavated minimally to 60 centimeters (cm) (2 feet) below the ground surface or until obstructed. All sediments will be screened through a 0.6-cm (1/4-inch) wire mesh screen. If buried cultural materials are encountered in any STU, one STU will be excavated up to 4.5 meters (15 feet) away in each cardinal direction (north, south, east, and west) to establish site boundaries without intruding on impervious surfaces, or areas outside of the APE. Where access and site conditions allow, this method will be employed until two adjacent sterile STUs are encountered. Field documentation will include descriptions of the stratigraphic profile, soil type descriptions, and descriptions of any cultural

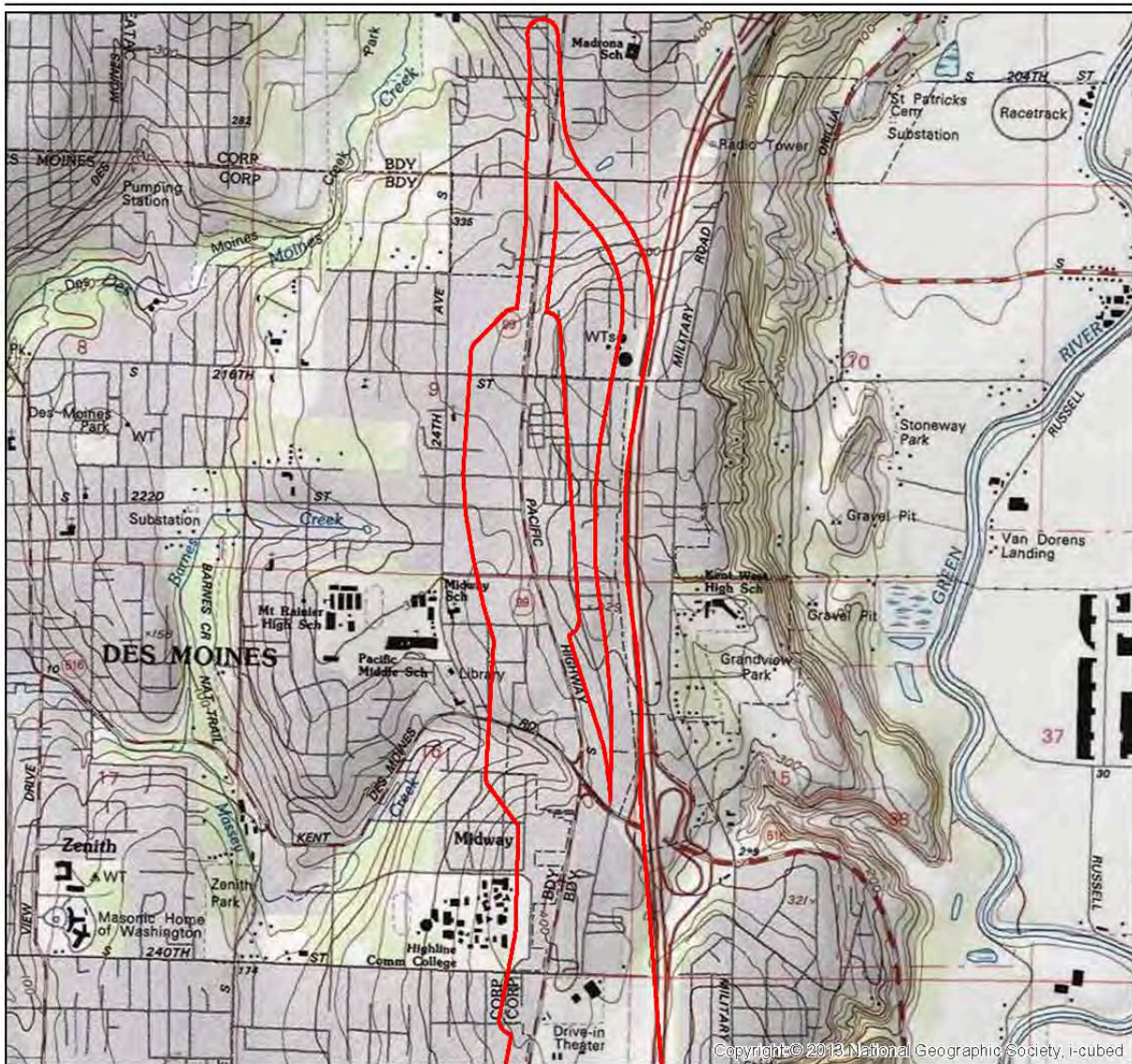
materials identified. Global Positioning System (GPS) coordinates and photographs will be collected for each STU. Any artifacts encountered will be analyzed, photographed, and recorded in the field, then reburied in the STU from which they originated. Collection of artifacts is not proposed for this phase of the study. An archaeologist will also review boring logs for any geotechnical borings during development of the Final EIS.

Once site boundaries have been established, the information gathered will be used to complete a Washington State Site or Isolate Inventory Form, as appropriate. Recommendations for site eligibility will be provided where possible, but this phase does not include formal Phase II evaluations that include completion of National Register Evaluation Forms. Per Washington State law (Revised Code of Washington 19.122 E2SHB 1634), it is assumed that utility locates will be conducted prior to the initiation of any subsurface archaeological testing. If no potentially eligible archaeological sites are discovered in the course of the survey, no additional fieldwork (Phase II) will be required. If potentially eligible archaeological sites are discovered, formal Phase II investigations may be recommended. Phase II investigations (evaluations) will be conducted once the Preferred Alternative is identified where potentially National Register eligible sites that cannot be avoided are discovered. A Phase II survey plan will be prepared if and when necessary.

6.0 Report

The results of the archaeological survey will be incorporated into the FWLE Historic and Archaeological Resources Technical Report completed for this undertaking. The results from Phase 1 on accessible properties will be incorporated into the version of this technical report released with the Draft EIS. The results from any additional properties where access will be gained between the Draft EIS and the Final EIS will be incorporated into the version of this technical report released with the Final EIS.

Archaeological sites and isolates, if encountered, will be documented and evaluated as needed to reach a finding of effect for the undertaking. Recommendations regarding the treatment of potentially eligible historic properties that may be identified will be included in the technical report. The technical report will be prepared meeting the Washington State Standards for Cultural Resource Reporting.



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33



0 0.25 0.5 0.75 1 mi

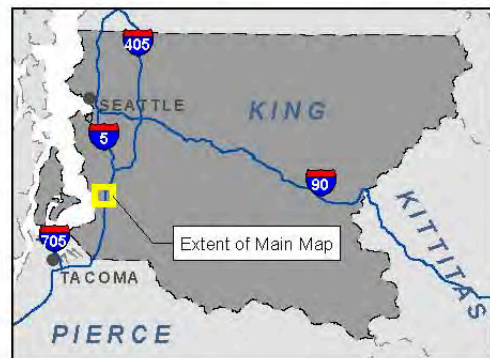
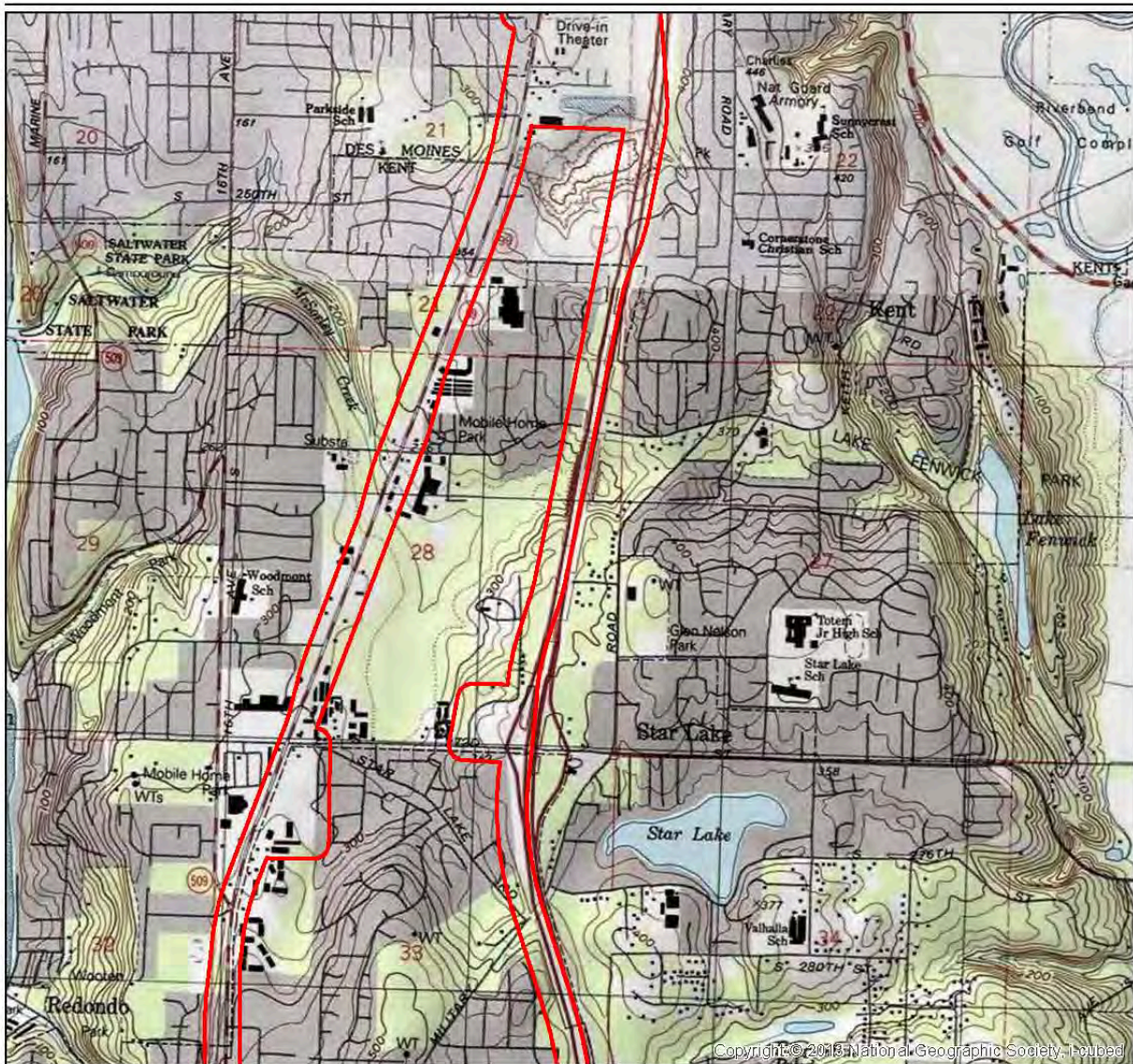


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
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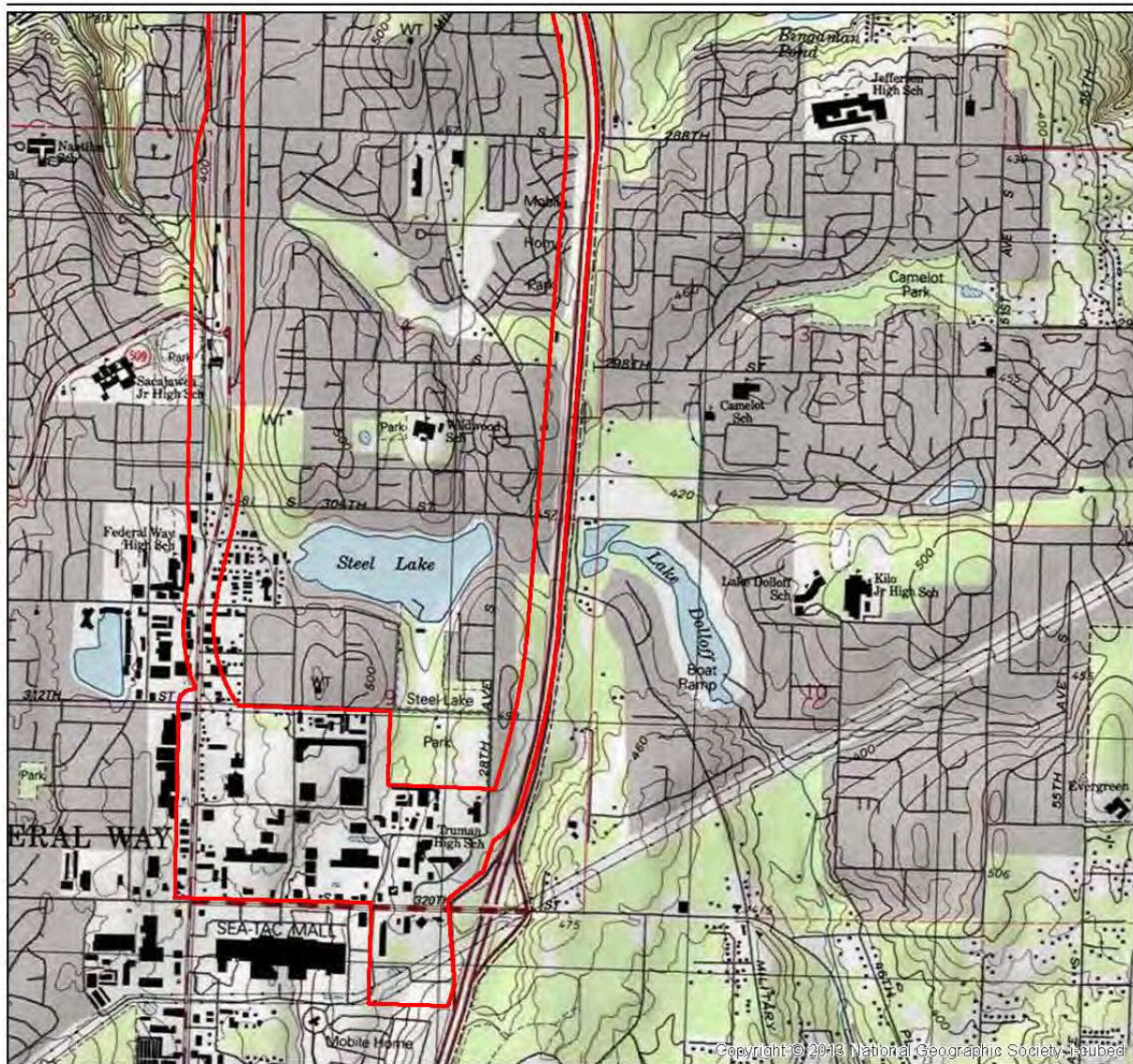


0 0.25 0.5 0.75 1 mi



FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

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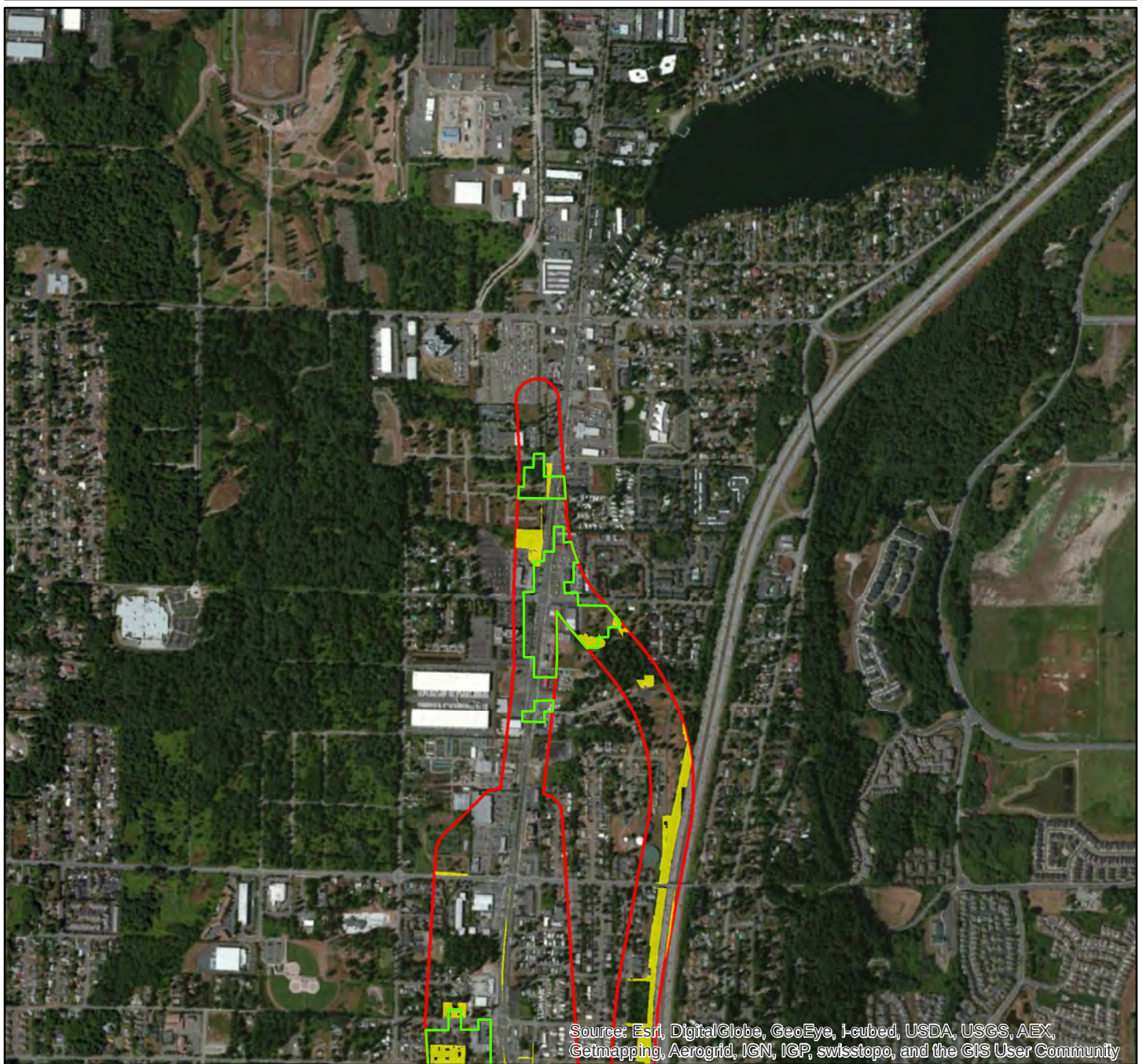


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FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



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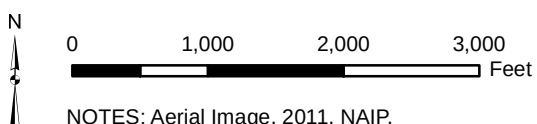
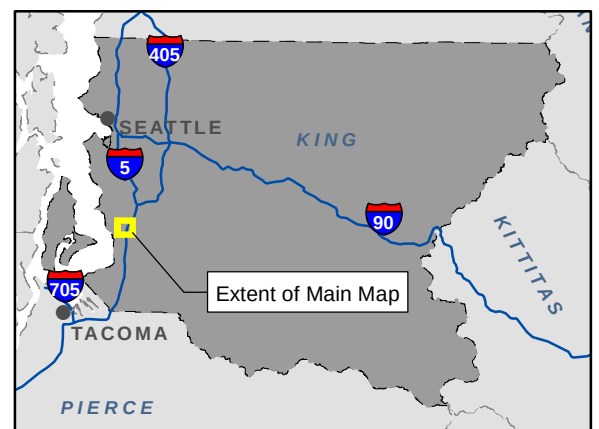
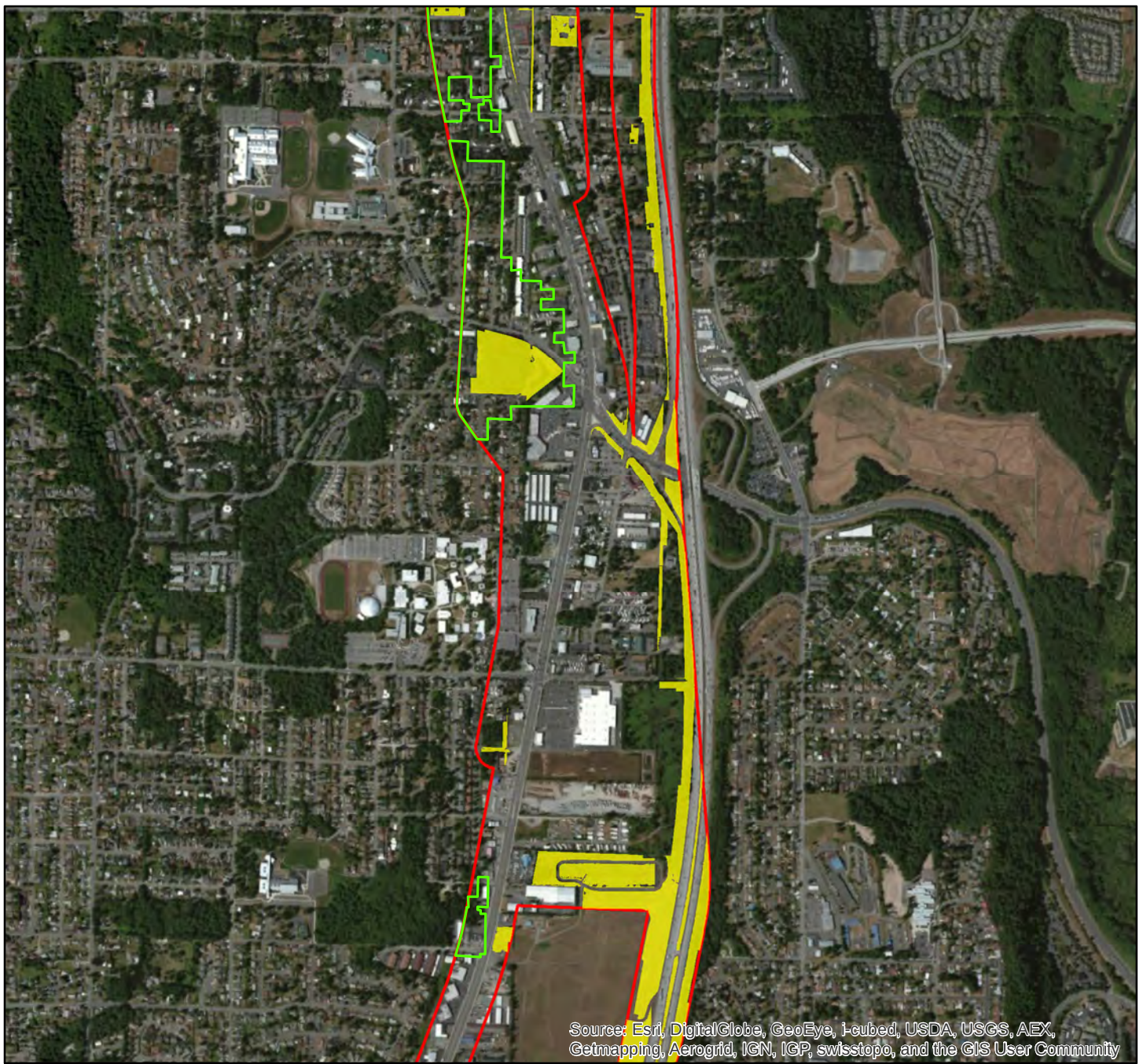


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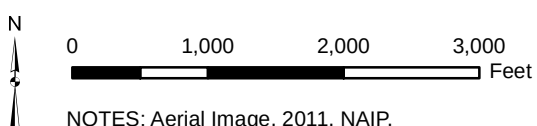
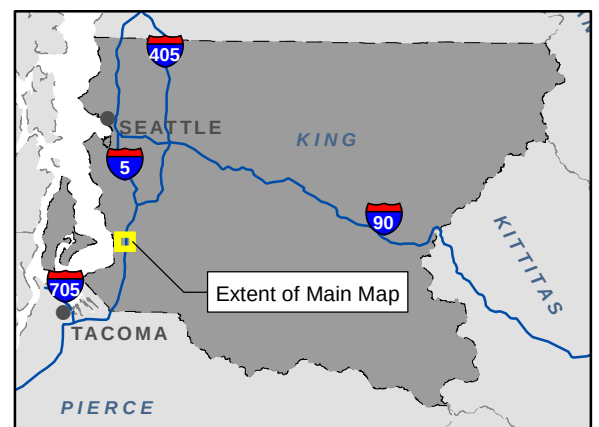
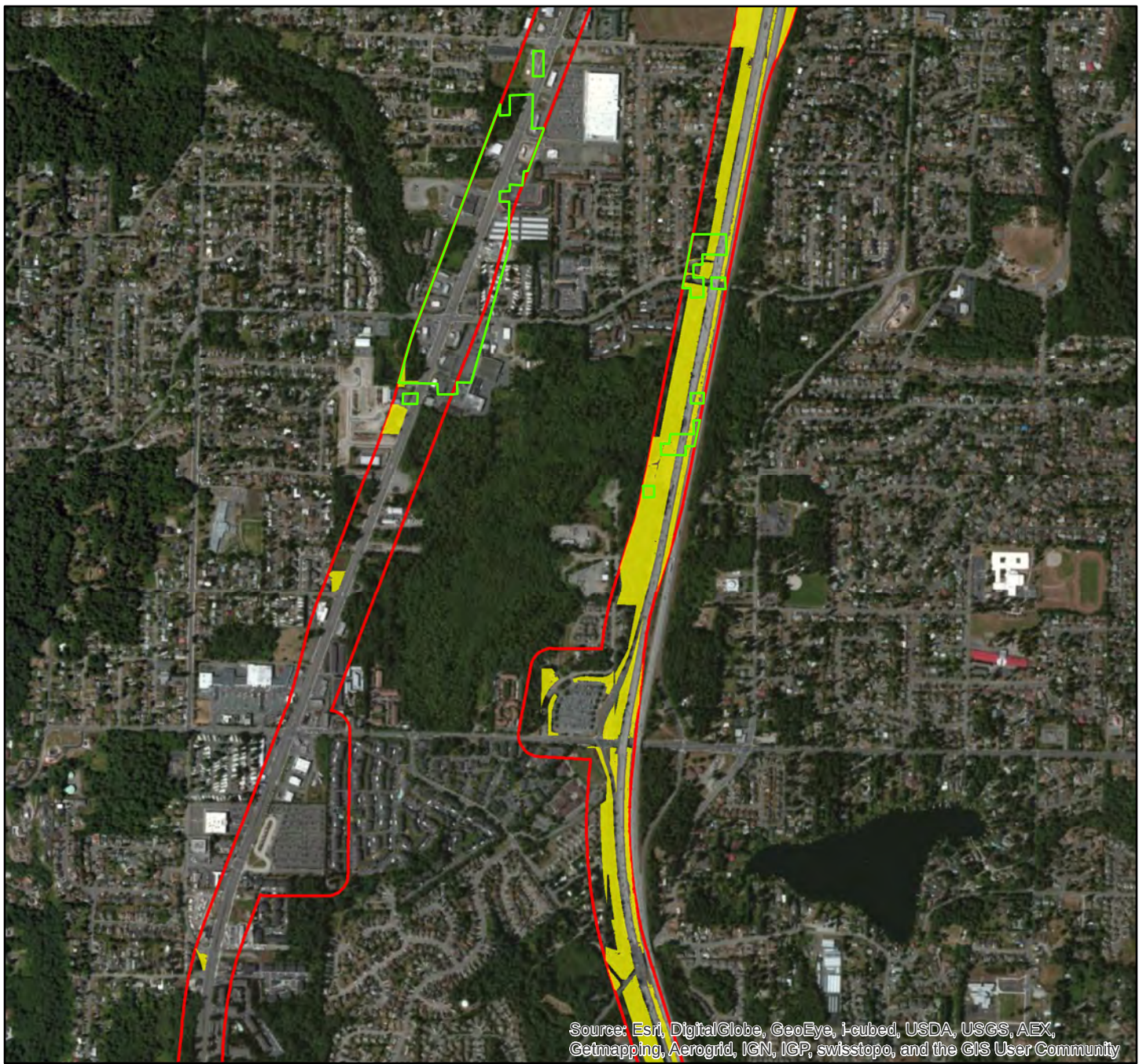


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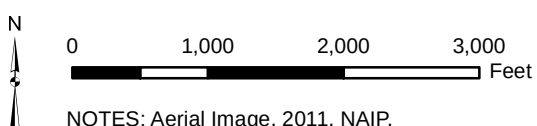
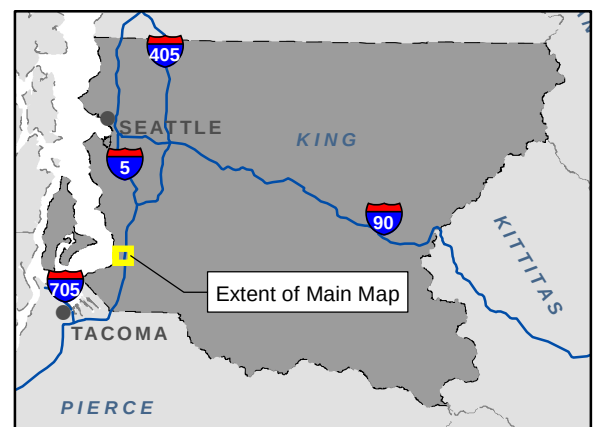
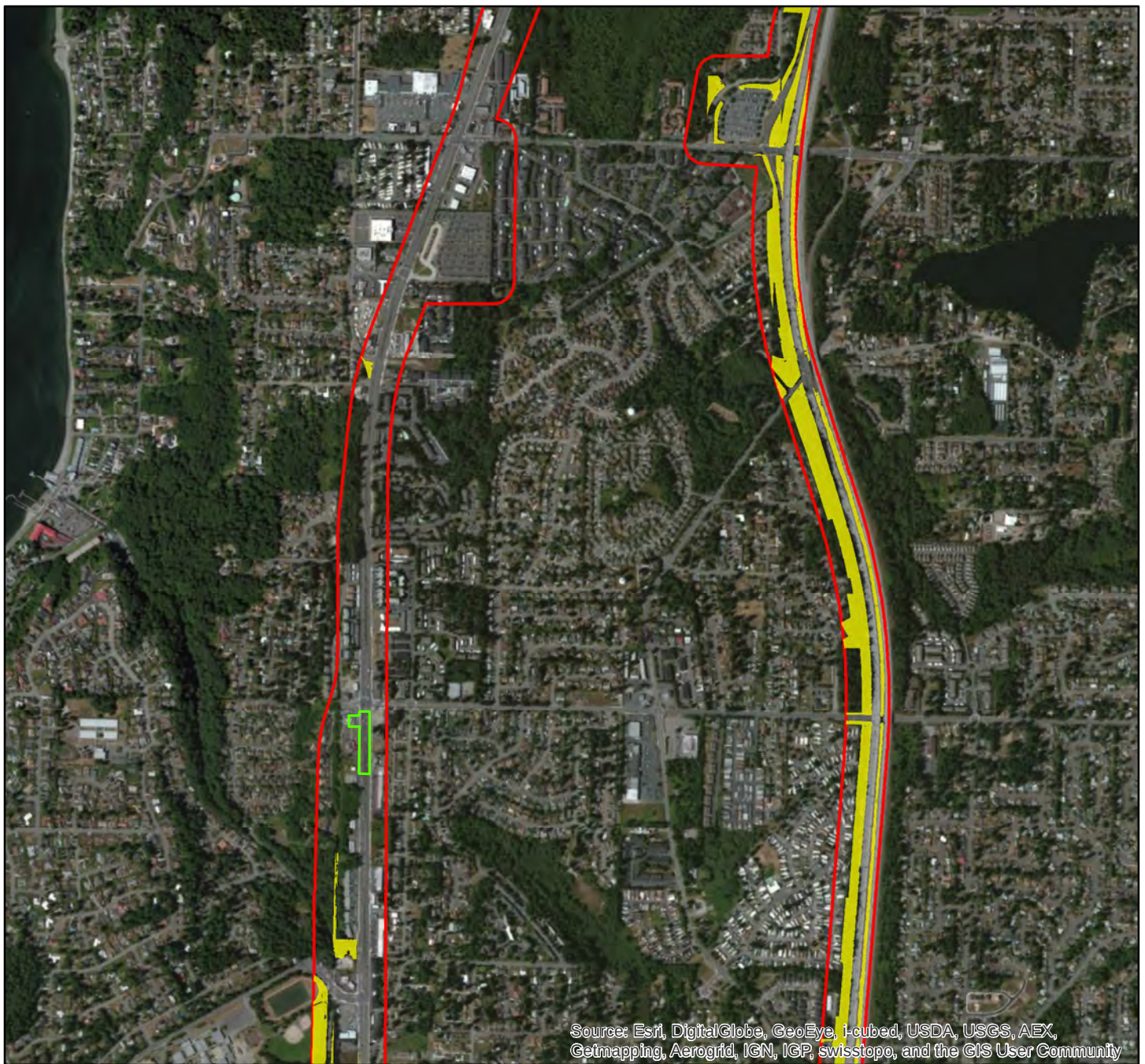


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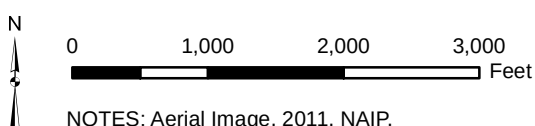
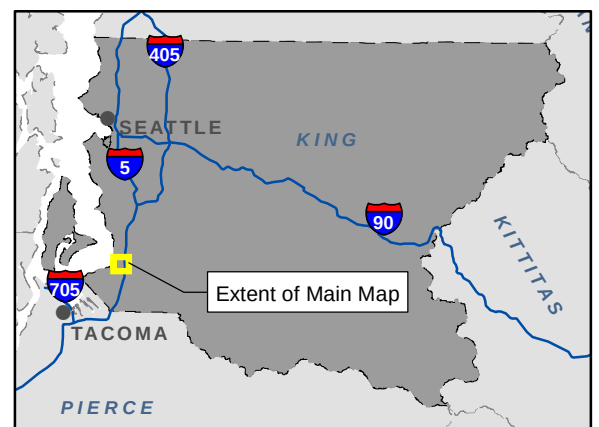
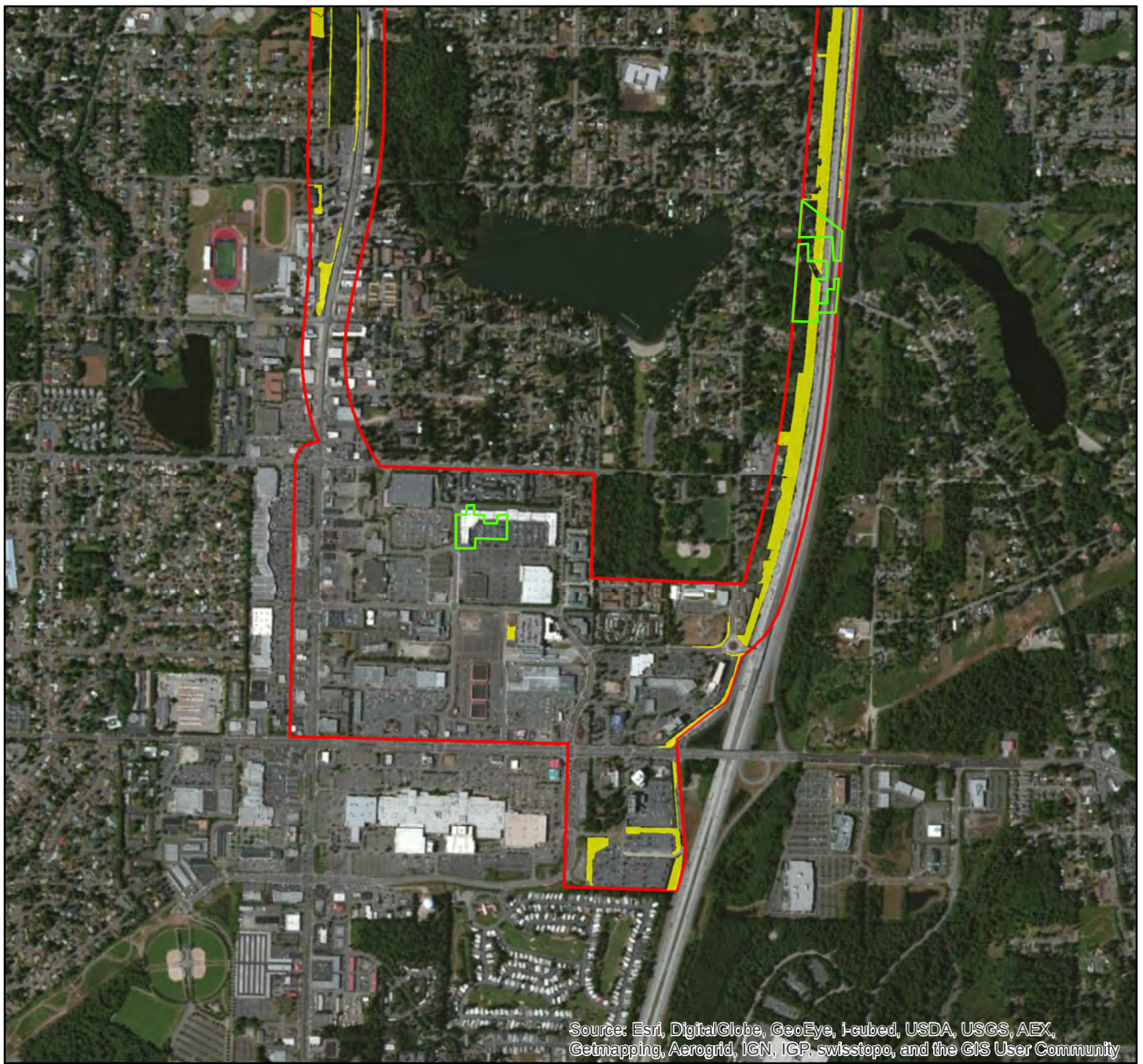


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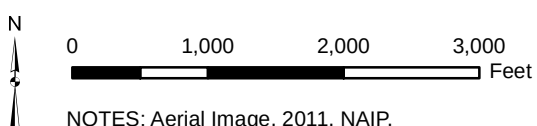
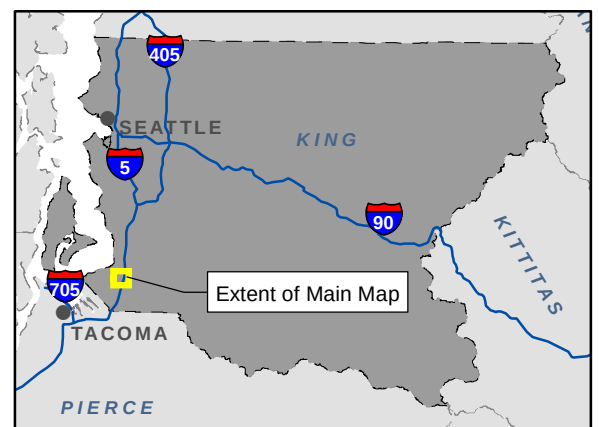


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**Federal Transit
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Washington

915 Second Avenue
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206-220-7954
206-220-7959 (fax)

April 2, 2014

Virginia Cross
Tribal Chair
Muckleshoot Indian Tribe
39015 172nd Ave SE
Auburn, WA 98092

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Area of Potential Effect & Archaeological Survey Plan**

The Honorable Virginia Cross:

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Enclosures: Archaeological Survey Plan

cc: Laura Murphy, Muckleshoot Indian Tribe
Matthew Sterner, DAHP
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Sound Transit Federal Way Link Extension

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Prepared by

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March 2014

1.0 Introduction

The Federal Transit Authority (FTA) and Sound Transit have proposed the Federal Way Link Extension (FWLE) project to expand the Sound Transit Link light rail system from SeaTac to the cities of Des Moines, Kent, and Federal Way in King County. The proposed project would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. Sound Transit is preparing an environmental impact statement (EIS) in compliance with the National Environmental Policy Act and the Washington State Environmental Policy Act. The Draft EIS is expected to be published in late 2014 or early 2015. Following public and agency comments on the Draft EIS, the Sound Transit Board will identify a Preferred Alternative. The Final EIS will evaluate the Preferred Alternative further, and following publication of the Final EIS and issuance of the Record of Decision (ROD) by FTA, the Sound Transit Board will identify the project to be built. Final design and right-of-way acquisition will not occur until after the ROD and board decision.

Section 106 consultation was initiated with the Washington State Department of Archaeology and Historic Preservation (DAHP), the federally-recognized Muckleshoot, Puyallup, Snoqualmie, Stillaguamish, Suquamish, and Yakama tribes, and the non-federally recognized Duwamish and Snohomish tribes on June 13, 2013. DAHP concurred with the Area of Potential Effect (APE) notification on December 30, 2013. An archaeological survey will be employed to meet the reasonable and good faith effort identification requirements of Section 106 and the Washington State Standards for Cultural Resource Reporting. This document outlines the methodology that will be employed during this effort.

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Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
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Sections 4, 5, 8, 9, & 16
Township 22 N, Range 4 E
Sections 4, 9, 10, 15, 16, 21, 22, 28, 32, & 33

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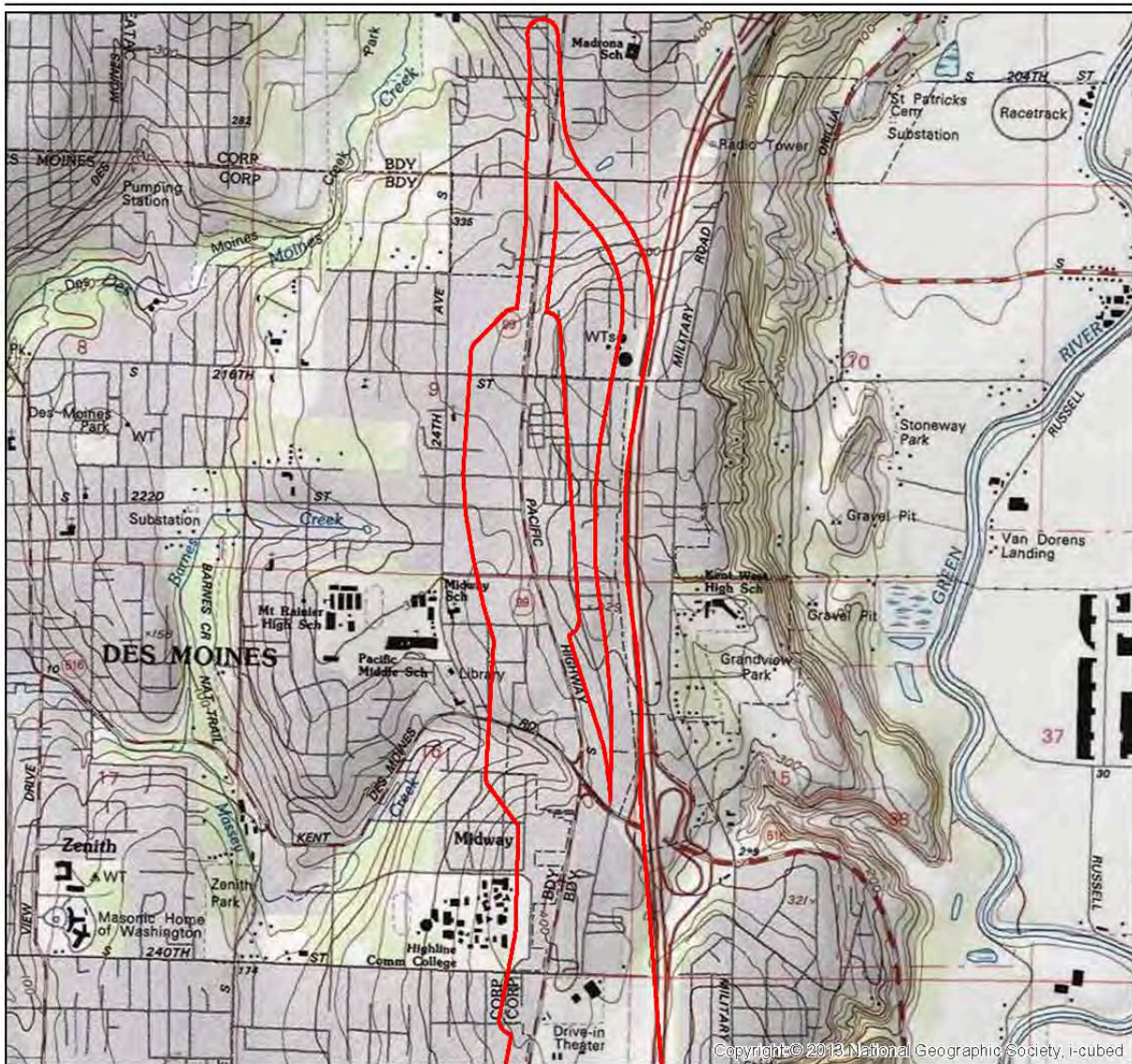
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Legend

Area of Potential Effects (APE)

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 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33



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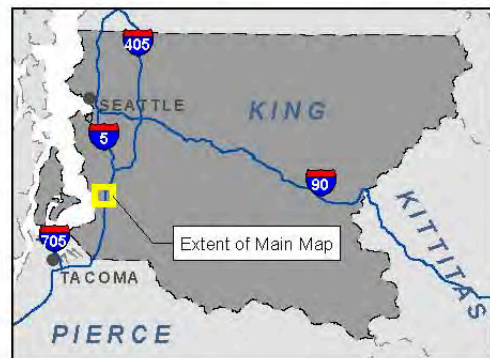
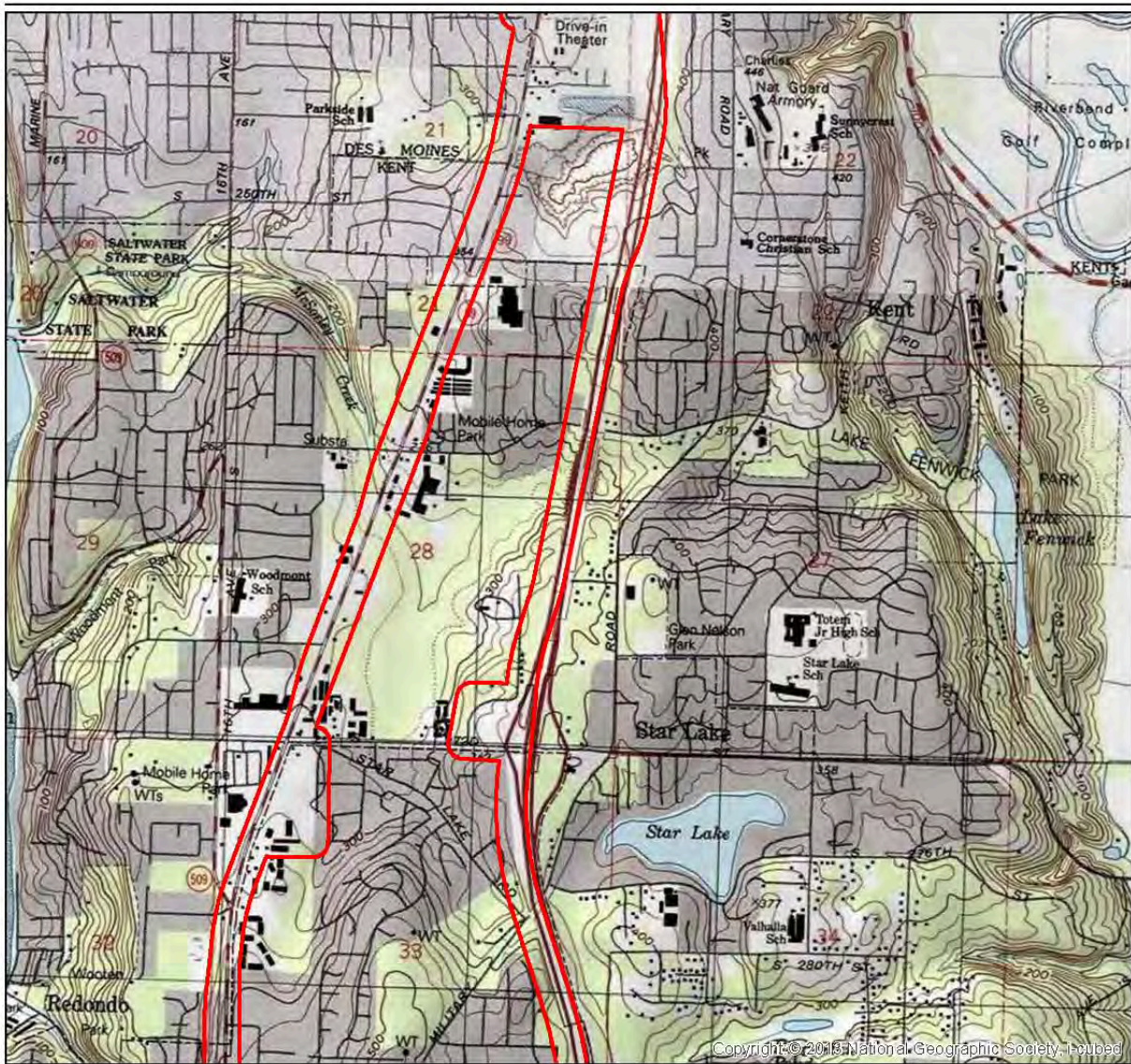


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

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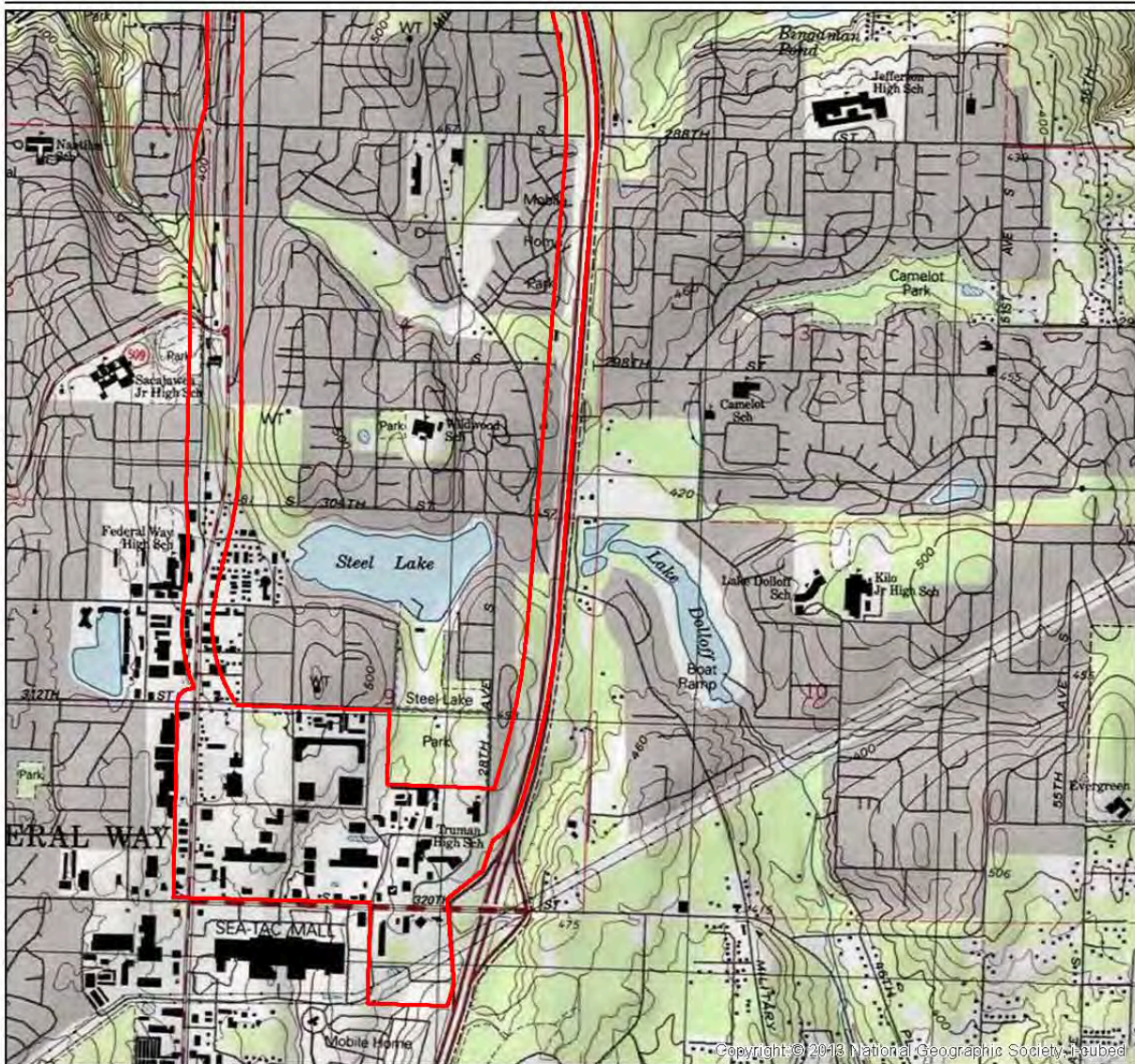


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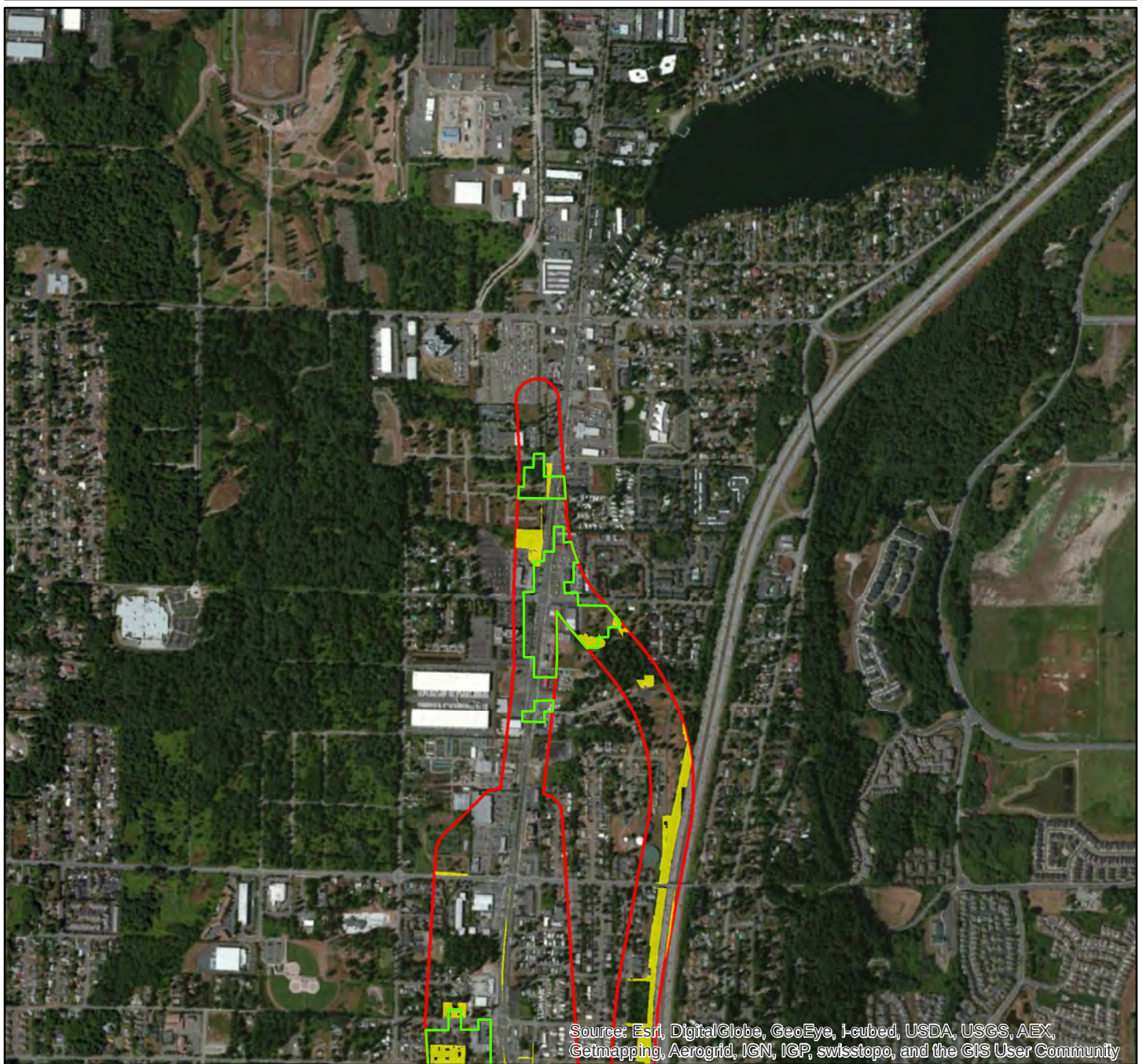


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FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:
 Statewide Predictive Model: Environmental Factors with Archaeological Resources Results. Washington Information System for Architectural and Archaeological Records Data, Department of Archaeology and Historic Preservation. 2014.
 Impervious/Impacted Surface Interpretation. King County GIS Center. 2009.

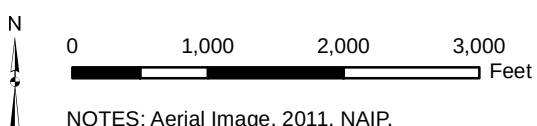
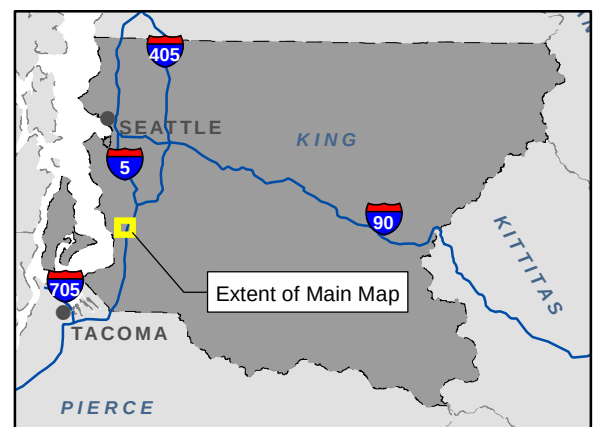
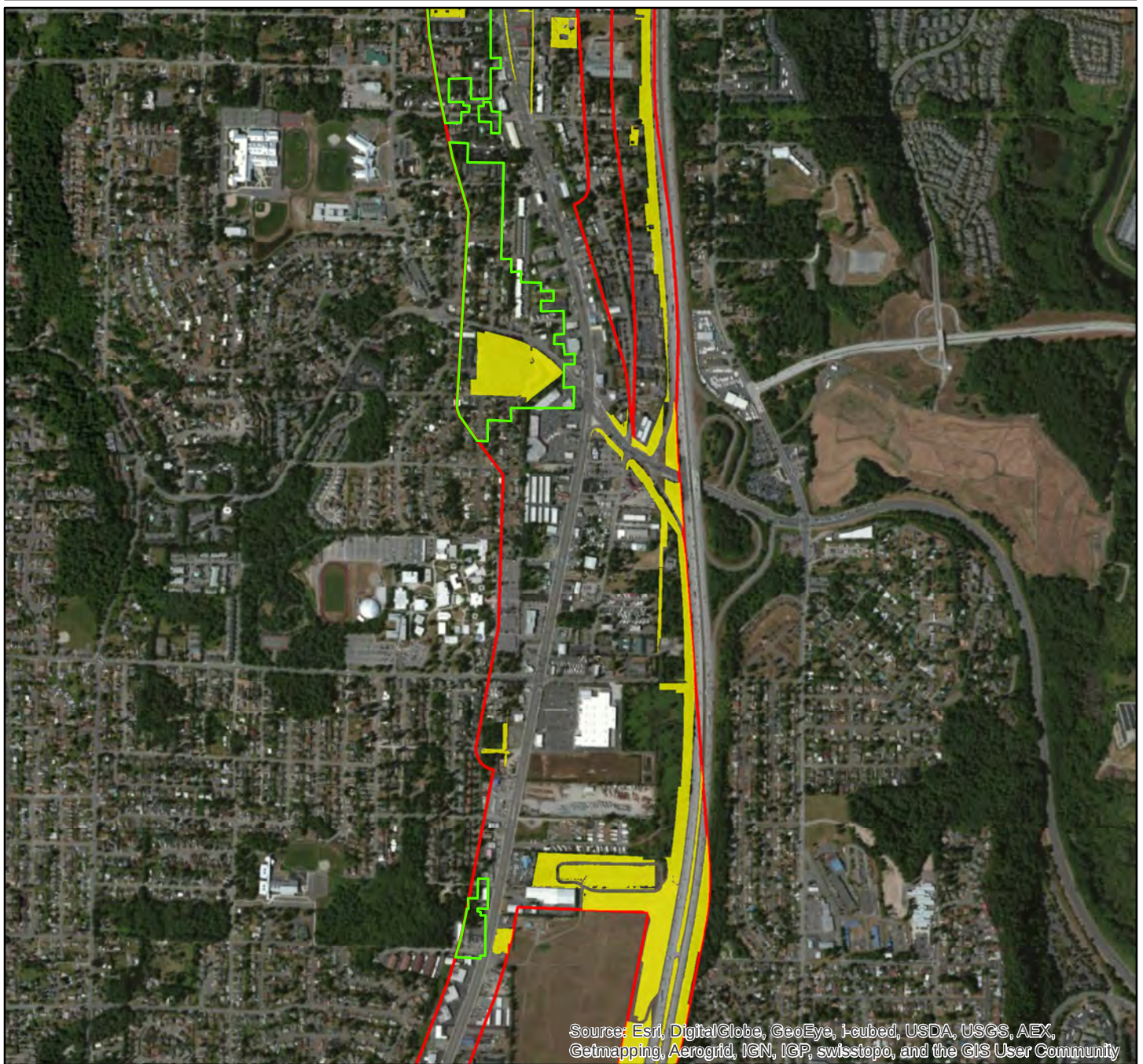


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



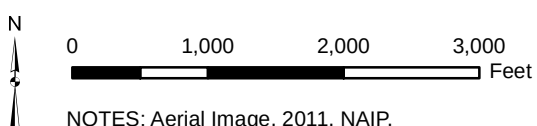
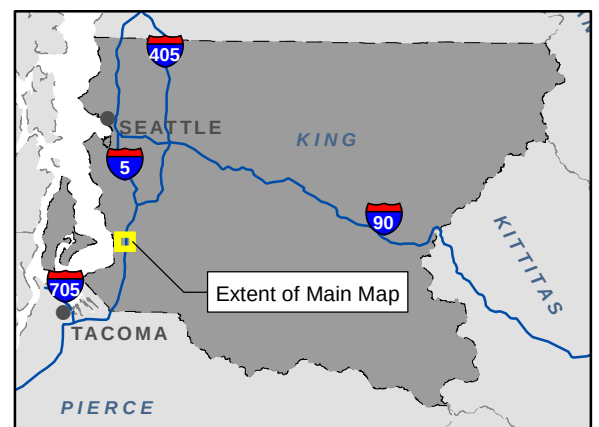
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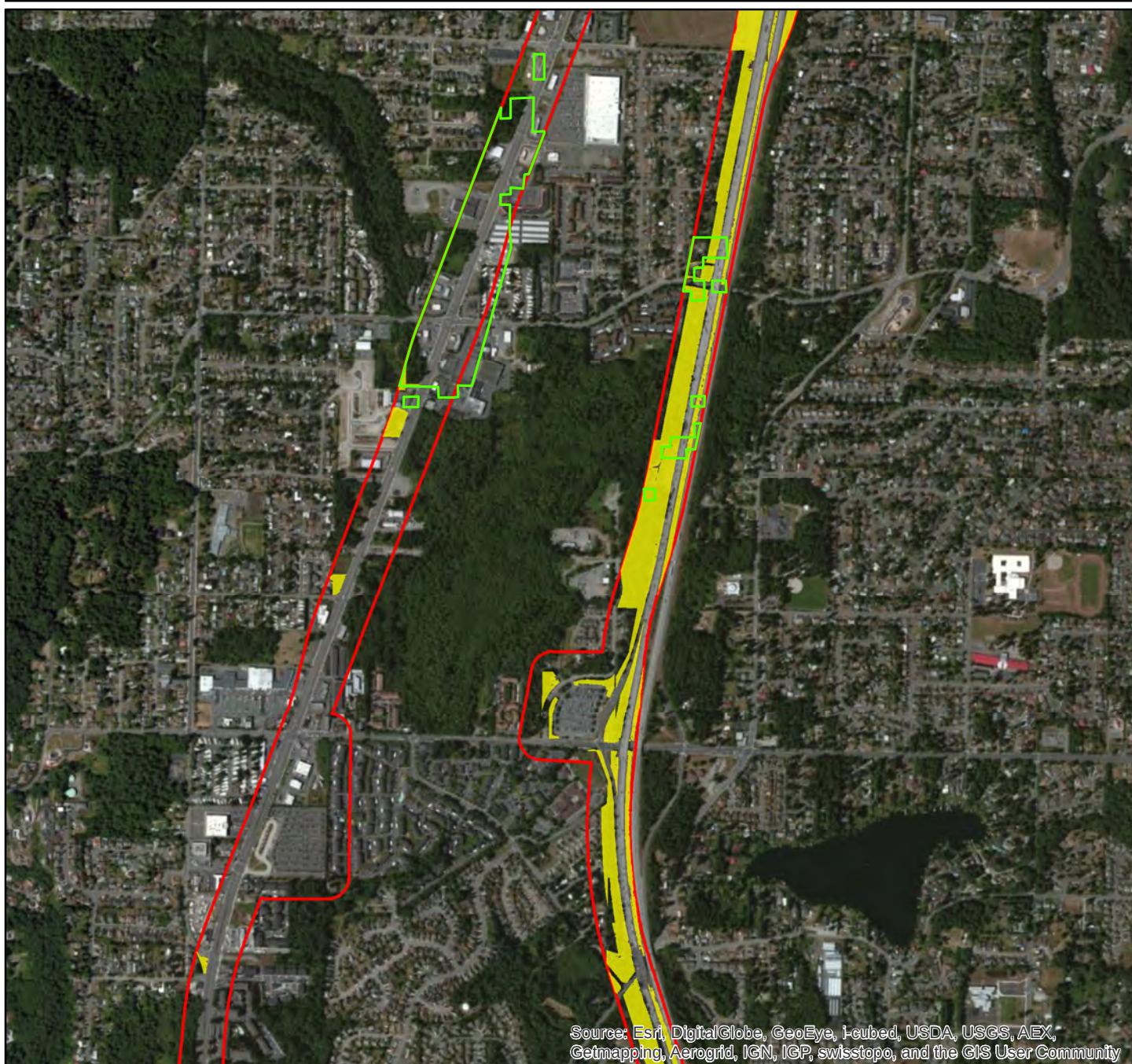
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NOTES: Aerial Image, 2011, NAIP.

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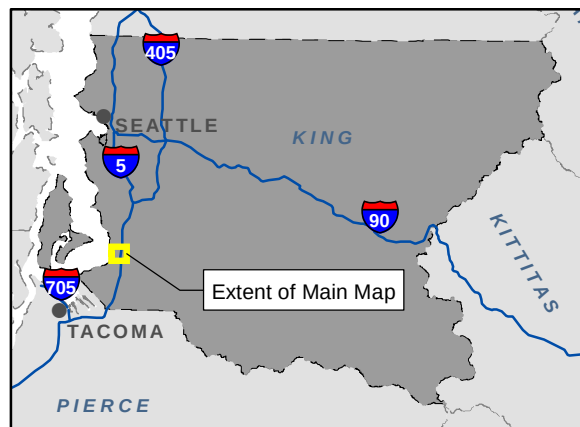
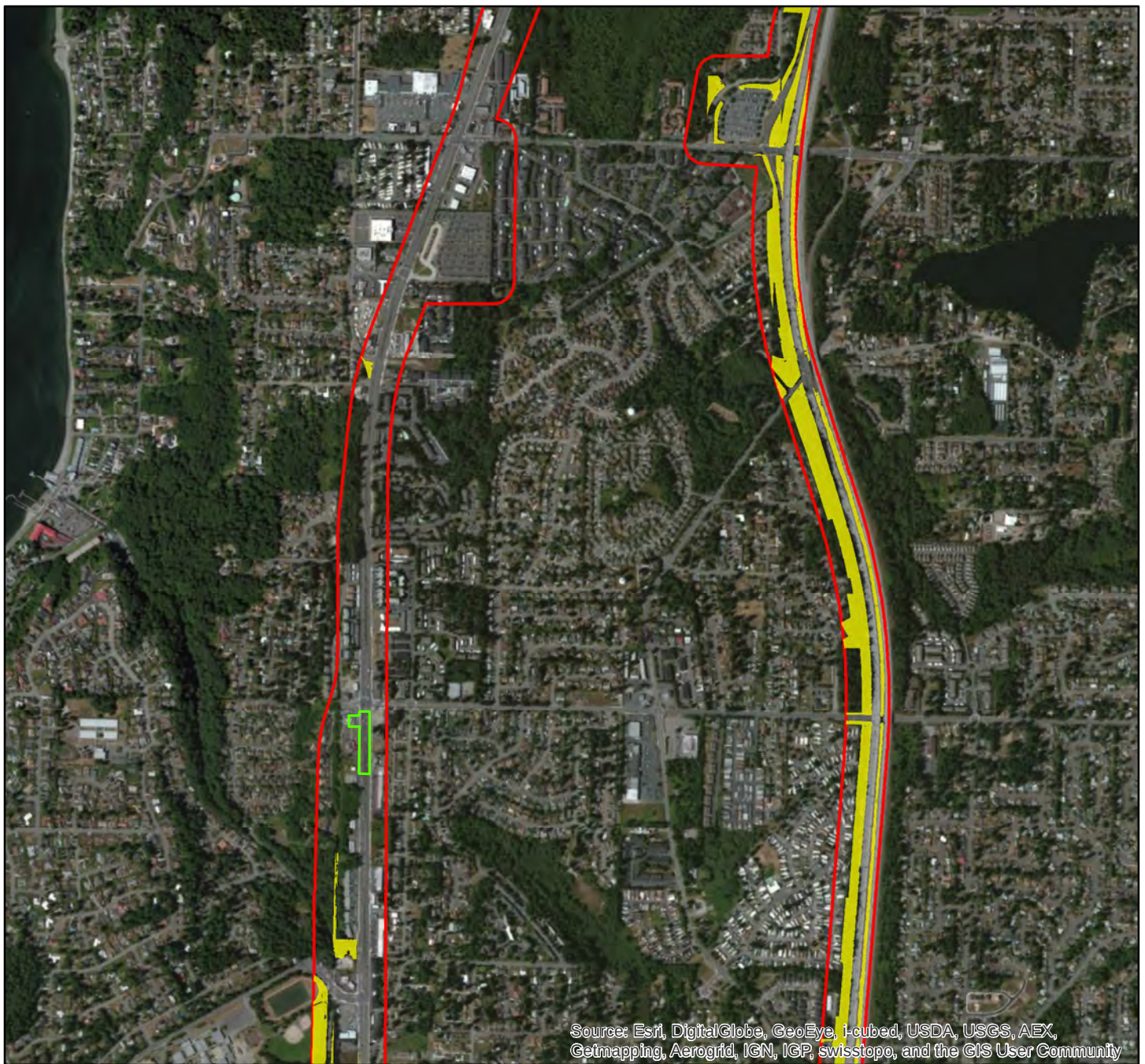


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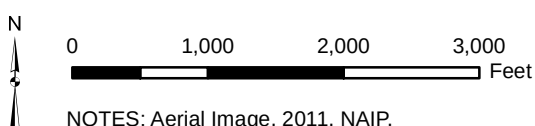
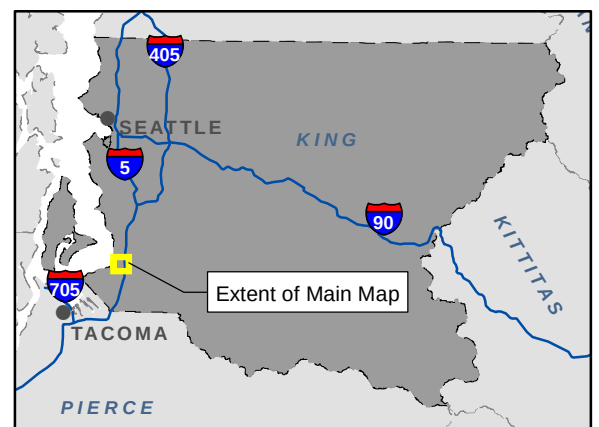
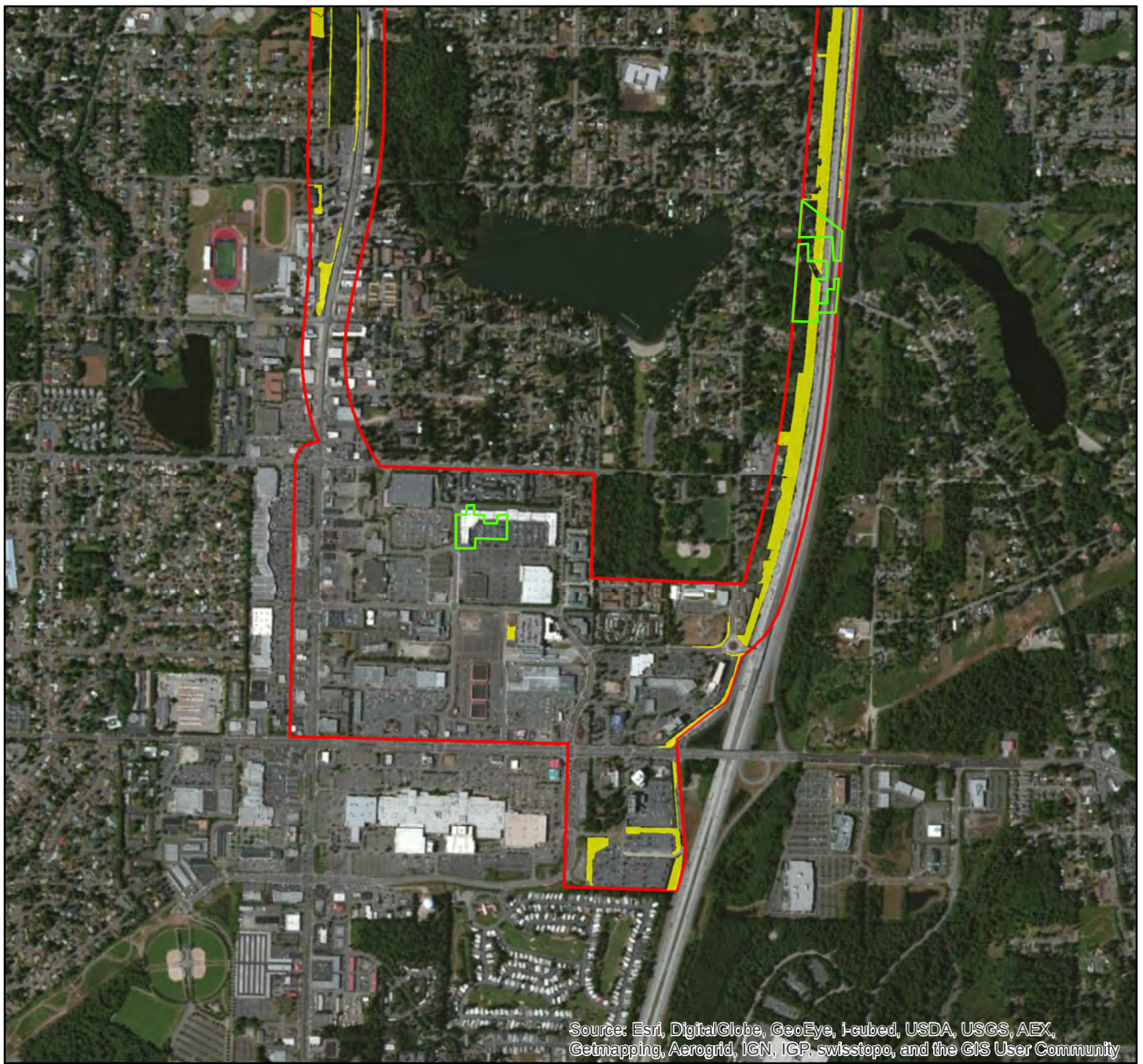


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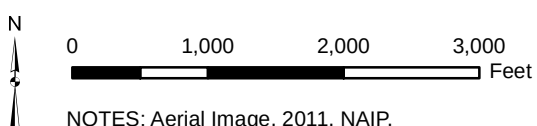
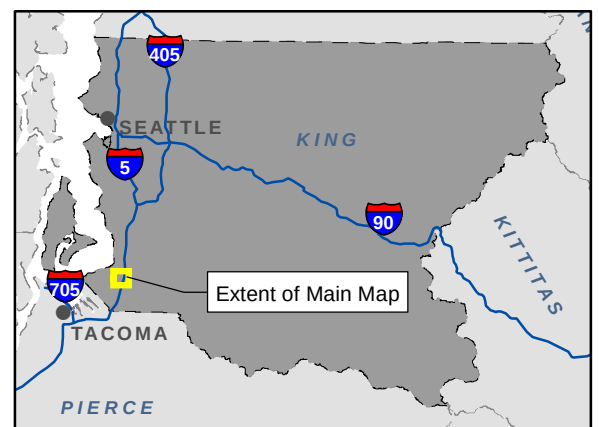


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U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

April 2, 2014

Carolyn Lubenau
Tribal Chair
Snoqualmie Tribe
PO Box 969
Snoqualmie, WA 98065

**Re: Sound Transit Federal Way Link Extension
Area of Potential Effect & Archaeological Survey Plan**

The Honorable Carolyn Lubenau:

The Federal Transit Administration (FTA) initiated Section 106 consultation for the Sound Transit Federal Way Link Extension (FWLE), previously Federal Way Transit Extension, in June 2013. Since then, an area of potential effect (APE) and an archaeological survey plan have been developed for the project. The project and APE are described below. This letter invites your review and comments on the APE and the enclosed archaeological survey plan.

Project Description:

The FWLE Draft Environmental Impact Statement (EIS) will evaluate a set of light rail alignments and stations that would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The alternatives to be evaluated in the Draft EIS are described below.

- **SR 99 Alternative:** The SR 99 alternative would consist of light rail guideway along the SR 99 median except for transitioning to the west side or east side of the roadway to access the three baseline stations at South Kent-Des Moines Road, South 272nd Street, and the Federal Way Transit Center. Optional station locations for the Kent-Des Moines and Federal Way Transit Center stations will be evaluated. The SR 99 alternative also includes additional station locations in the vicinities of South 216th Street and South 260th Street. An alignment option along the west side of SR 99 in Federal Way will also be evaluated.
- **I-5 Alternative:** The I-5 alternative consists of light rail guideway along the south side of the proposed SR 509 right-of-way (ROW) directly to I-5, then proceeding along the west side of the I-5 ROW. The guideway deviates west from the I-5 ROW near 317th Street to access the Federal Way Transit Center area. There would be three baseline stations at Kent-Des Moines, South 272nd Street, and the Federal Way Transit Center. Optional station locations for the Kent-Des Moines and Federal

Way Transit Center stations will be evaluated. Additionally an alignment option that transitions to the I-5 median to avoid the Midway Landfill is to be evaluated.

- SR 99/I-5 Alternative: The SR 99 to I-5 alternative would be the same as the SR 99 alternative till approximately Kent-Des Moines Road. Here it would transition to the I-5 corridor, with the Kent-Des Moines Station being located near 30th Avenue South, directly South of South 240th Street, this alternative would be the same as the I-5 alternative.
- I-5/SR 99 Alternative: The I-5 to SR 99 alternative would be the same as the I-5 alternative to approximately Kent-Des Moines Road, where it would transition to the SR 99 corridor, with the Kent-Des Moines Station located near 30th Avenue South, directly South of South 240th Street; this alternative would be the same as the SR 99 alternative.

Area of Potential Effect

The APE extends 200 feet from each side of the center of the guideway alignments. It also includes a radius of approximately 200 feet from the outer limits of station locations and ancillary facilities. Specific locations and footprints for the Kent-Des Moines station, and the Federal Way Transit Center station have not been finalized. In these areas the APE includes the entirety of the area between Kent-Des Moines Road, South 240th Street, SR 99, and I-5; and most of the area between South 312th Street and South 320th Street in Federal Way (see Figure 1, page 3 and Figure 2, page 5). Excluded from consideration is part of Steel Lake Park.

The APE also includes the areas where the project could directly disturb prehistoric and historic-period archaeological resources. Although the locations of project elements are not precisely known at this stage of the project, they are anticipated to be within the 200 foot buffer around the project elements described above. Details regarding the depth of construction will vary by alternative and will be developed as the project continues through project review and design.

We look forward to your comments on the APE and the archaeological survey plan. So that we may move forward with the archaeological investigations, we respectfully request that you provide any comments within 30 days.

If you have any questions or need further information, please feel free to contact Steve Saxton, FTA, at 206-220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at 206-395-5103 or kent.hale@soundtransit.org.

Sincerely,



R.F. Krochalis
Regional Administrator

Enclosures: Archaeological Survey Plan

cc: Steven Mullen Moses, Snoqualmie Tribe
Matthew Sterner, DAHP
Kent Hale, Sound Transit

Sound Transit Federal Way Link Extension

Research Design for Archaeological Fieldwork

Prepared by

Keith Mendez, M.A., CH2M HILL, Inc.

March 2014

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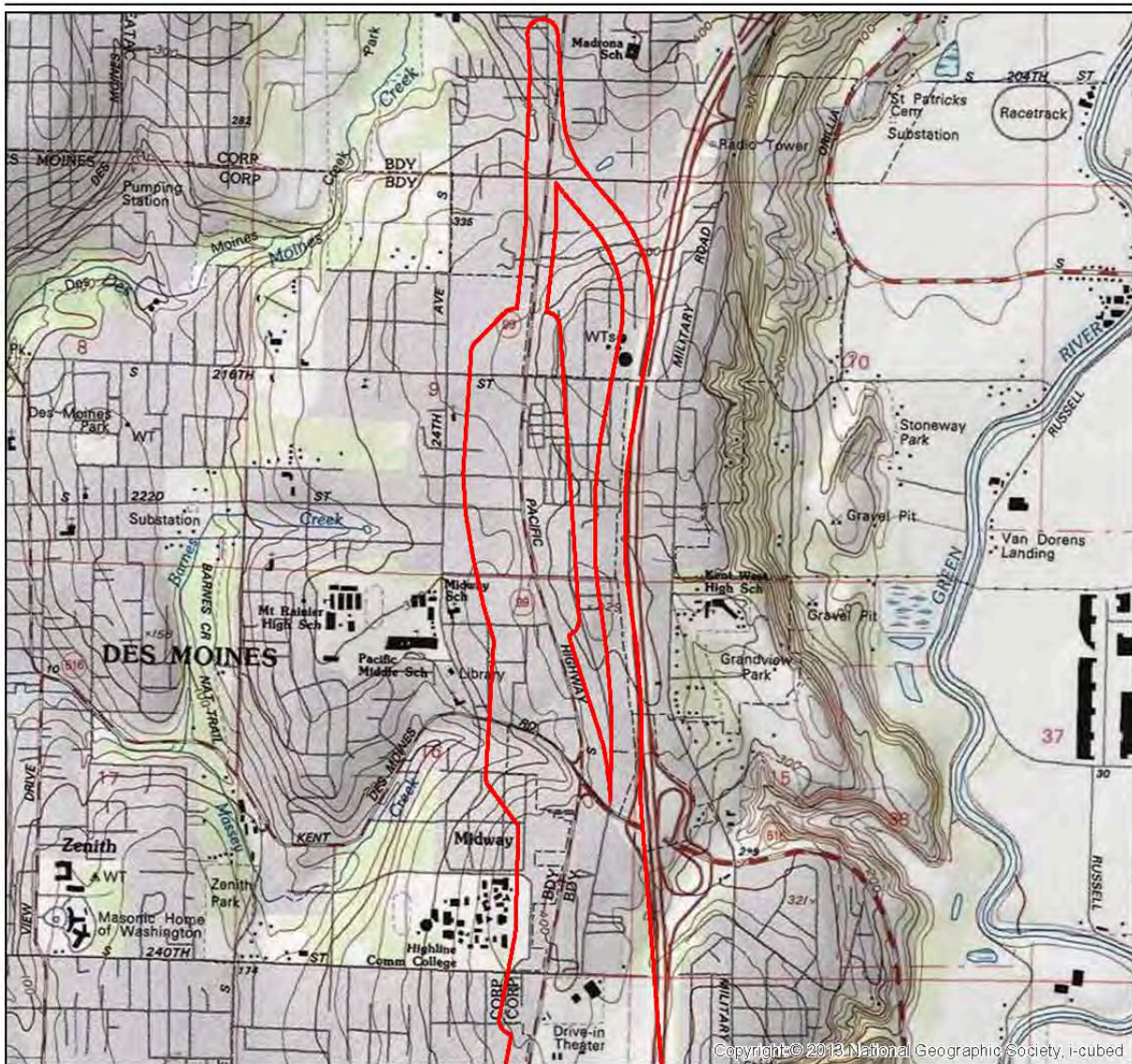
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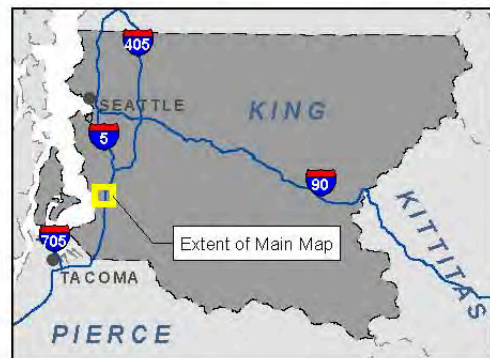
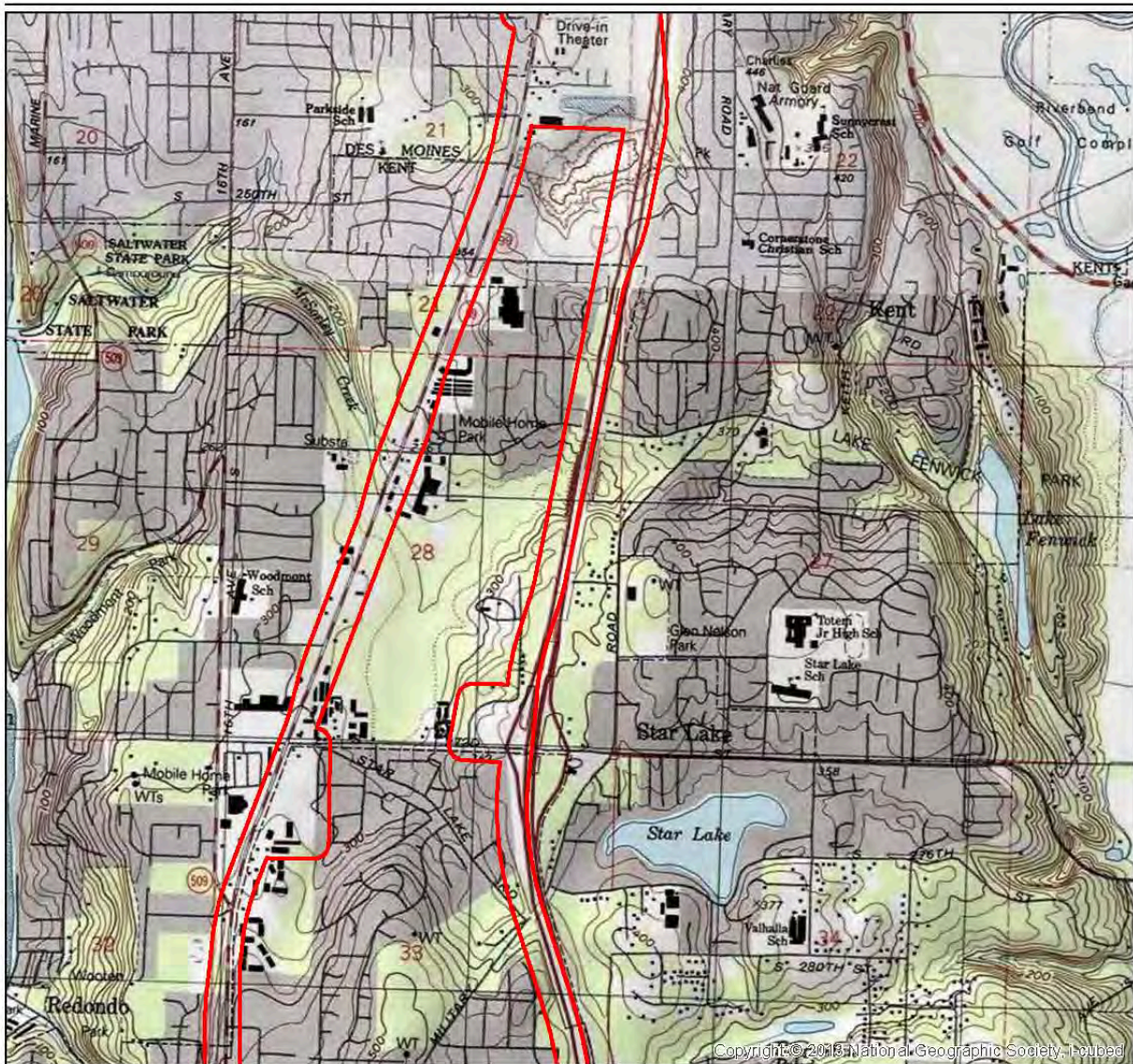


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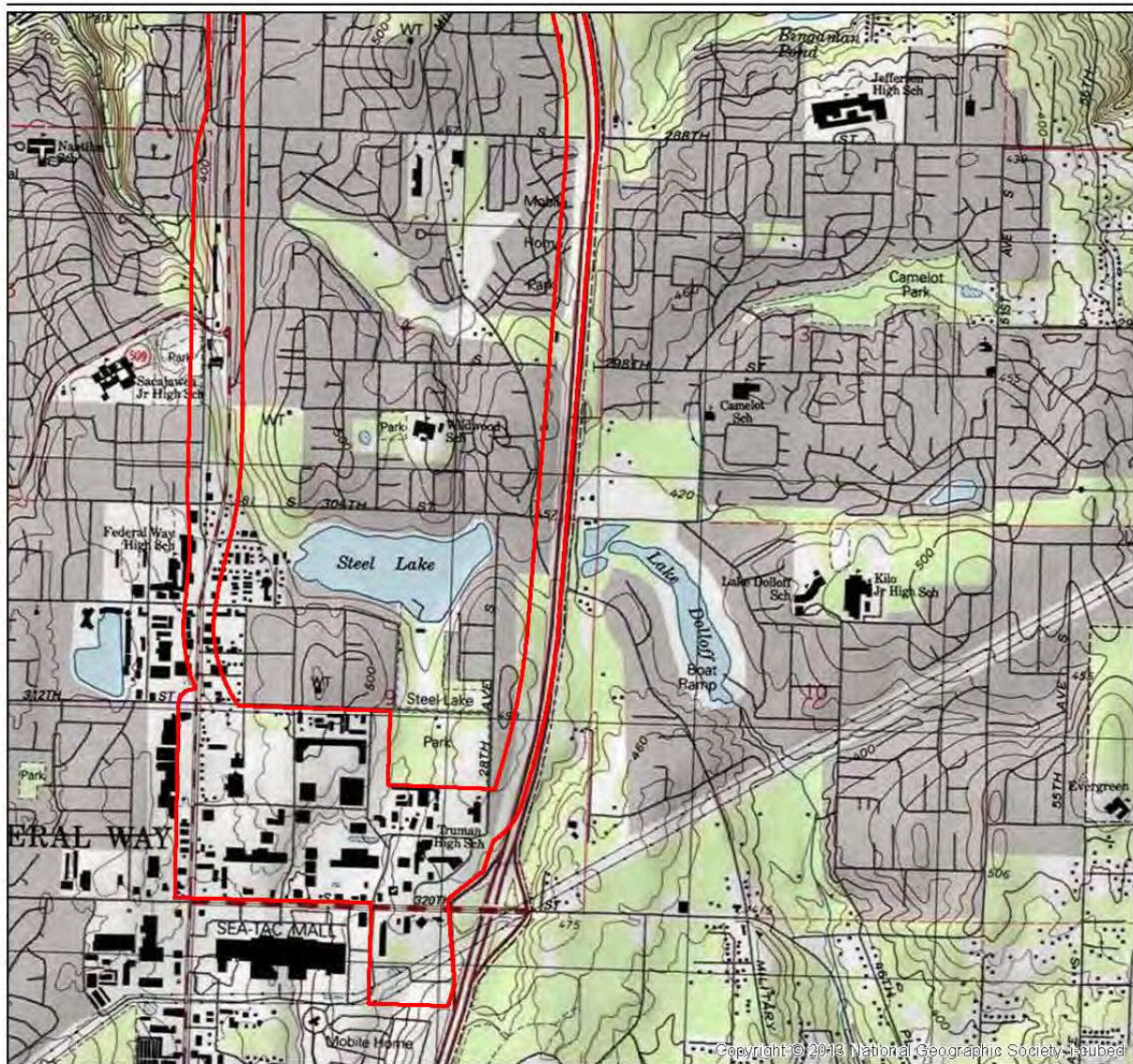


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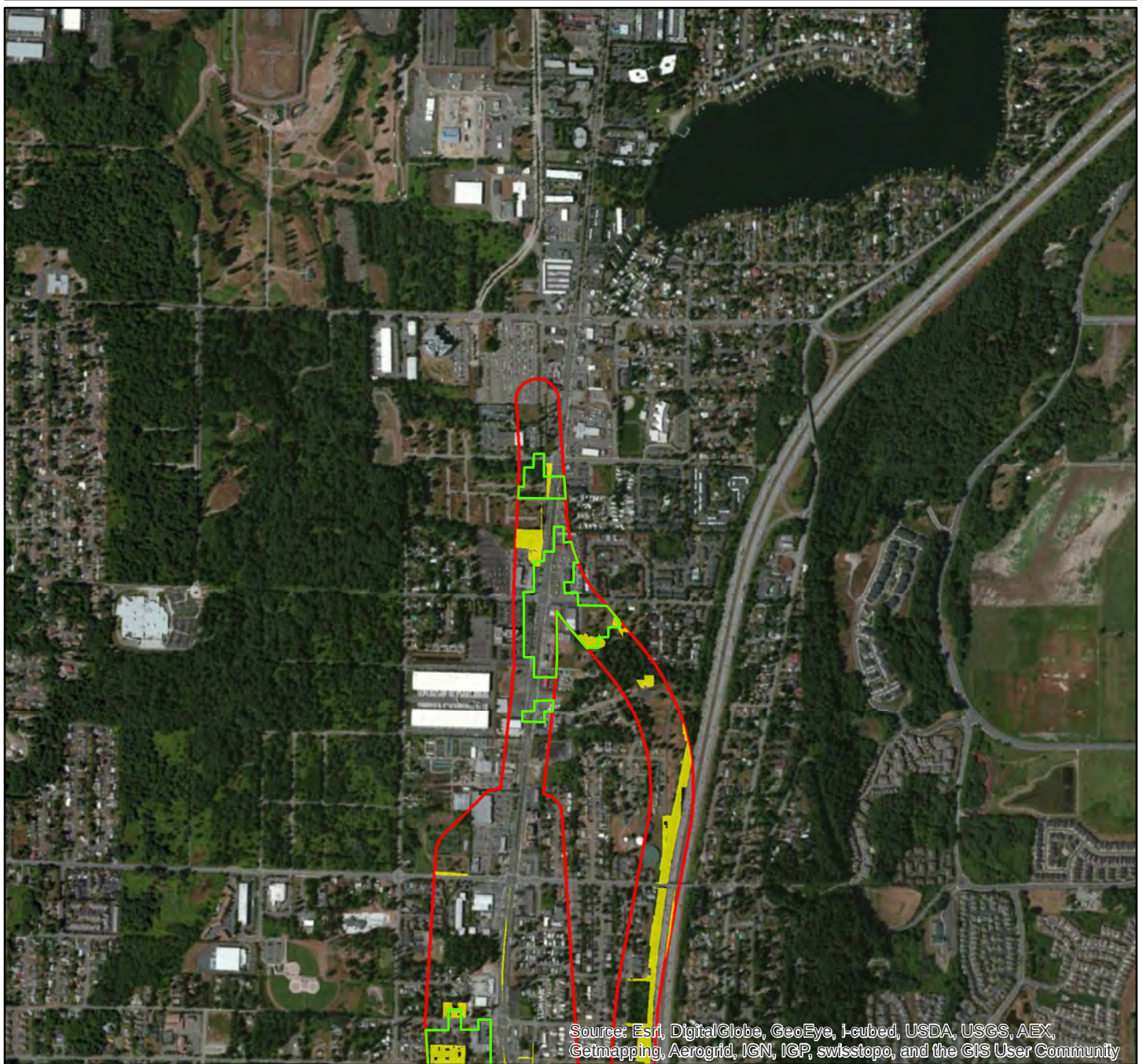


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 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:
 Statewide Predictive Model: Environmental Factors with Archaeological Resources Results. Washington Information System for Architectural and Archaeological Records Data, Department of Archaeology and Historic Preservation. 2014.
 Impervious/Impacted Surface Interpretation. King County GIS Center. 2009.

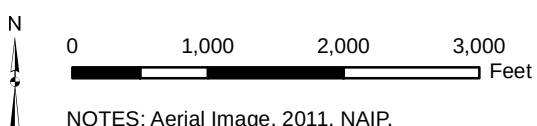
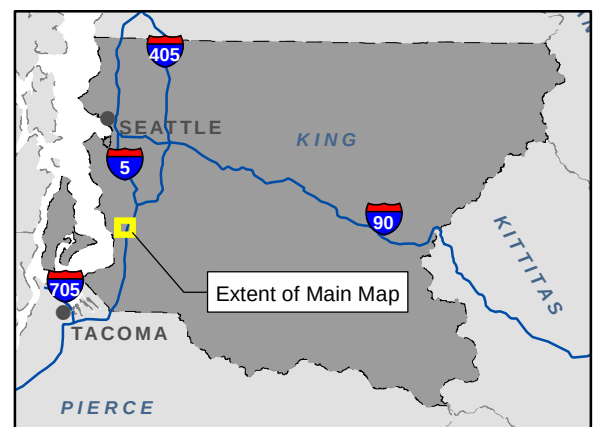
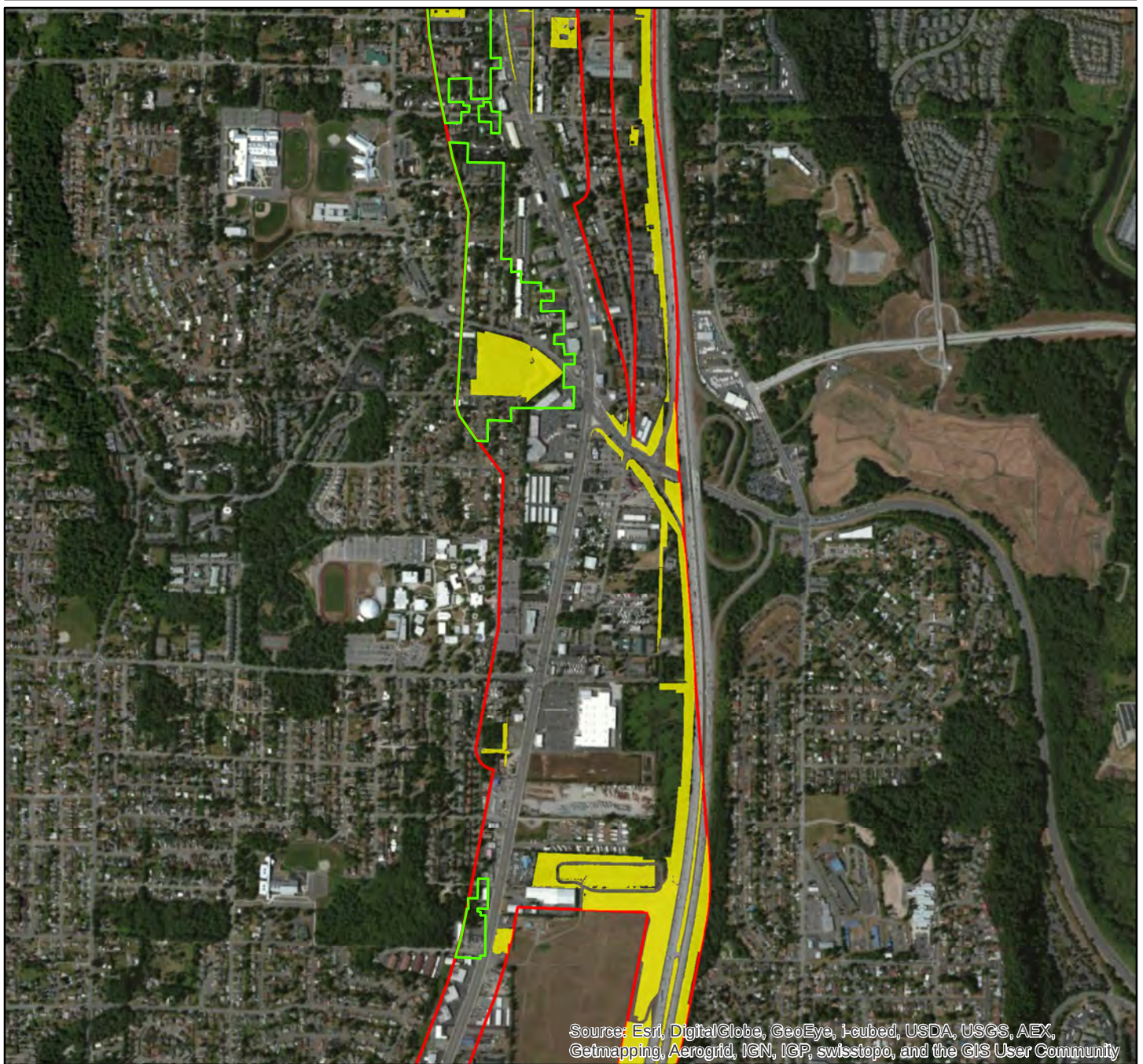


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:

Statewide Predictive Model: Environmental Factors with Archaeological Resources Results. Washington Information System for Architectural and Archaeological Records Data, Department of Archaeology and Historic Preservation. 2014.

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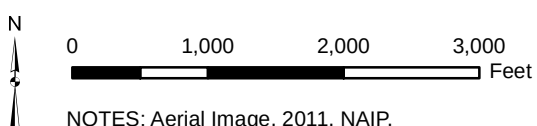
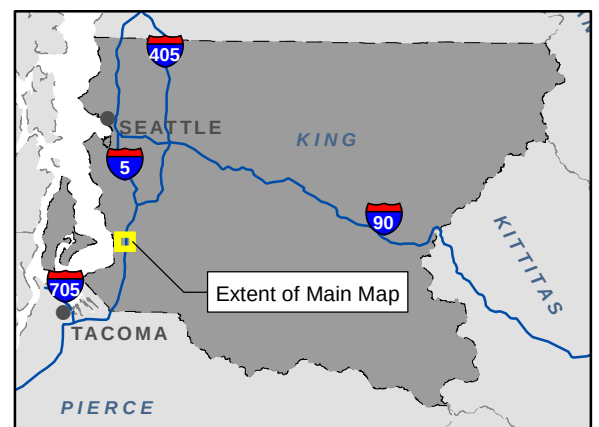
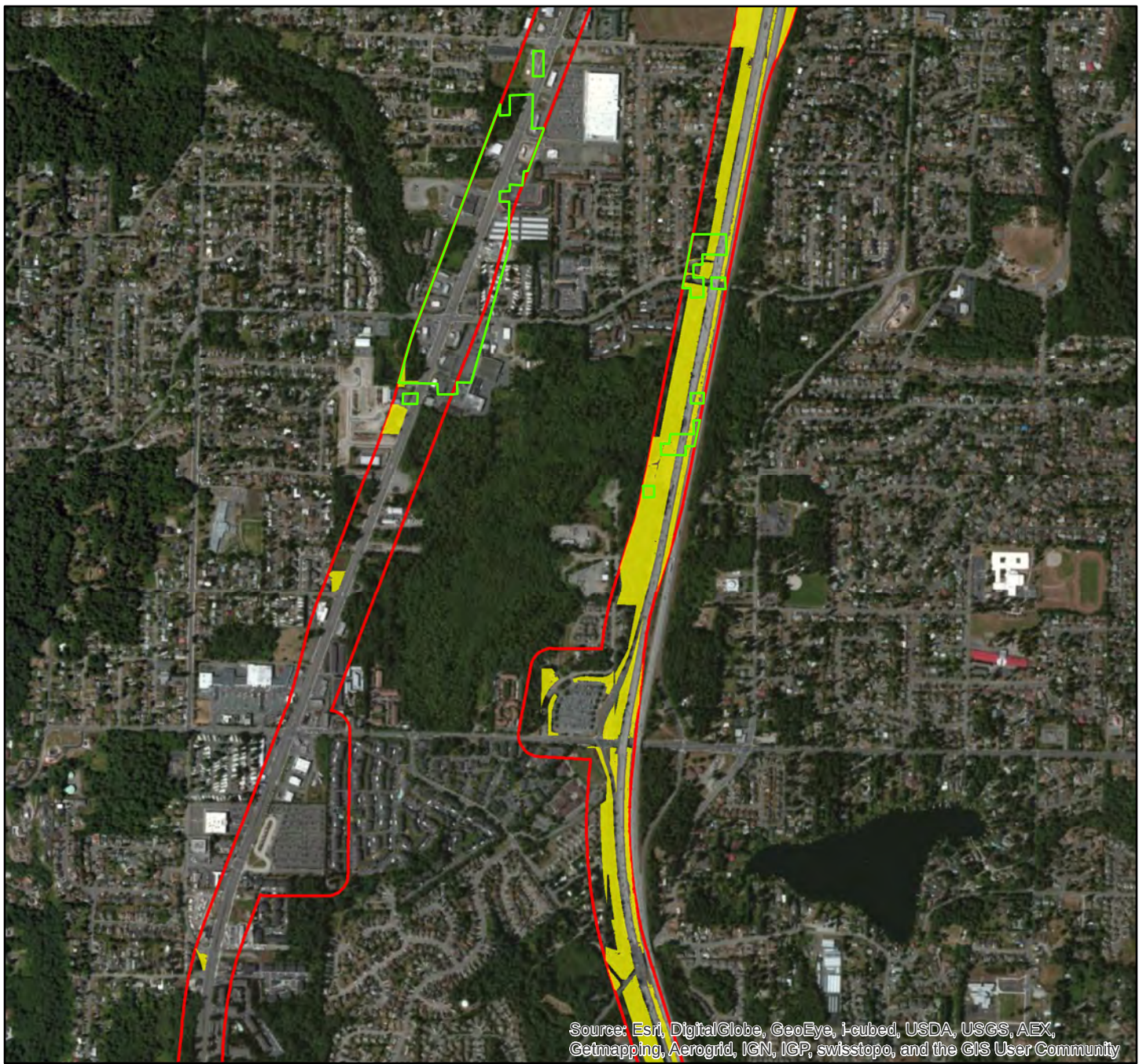


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
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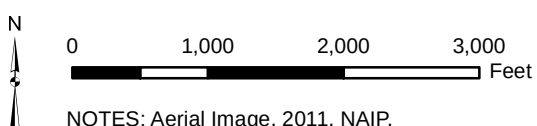
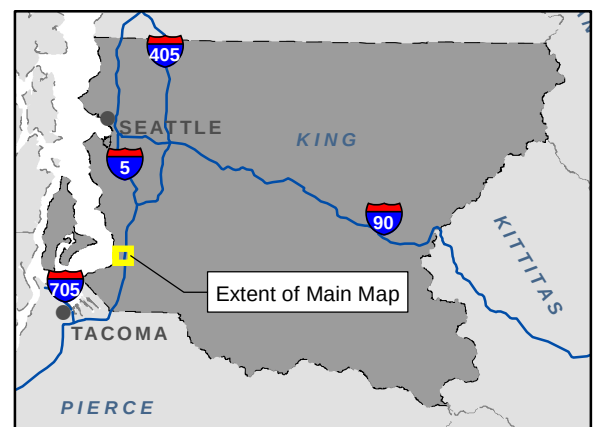
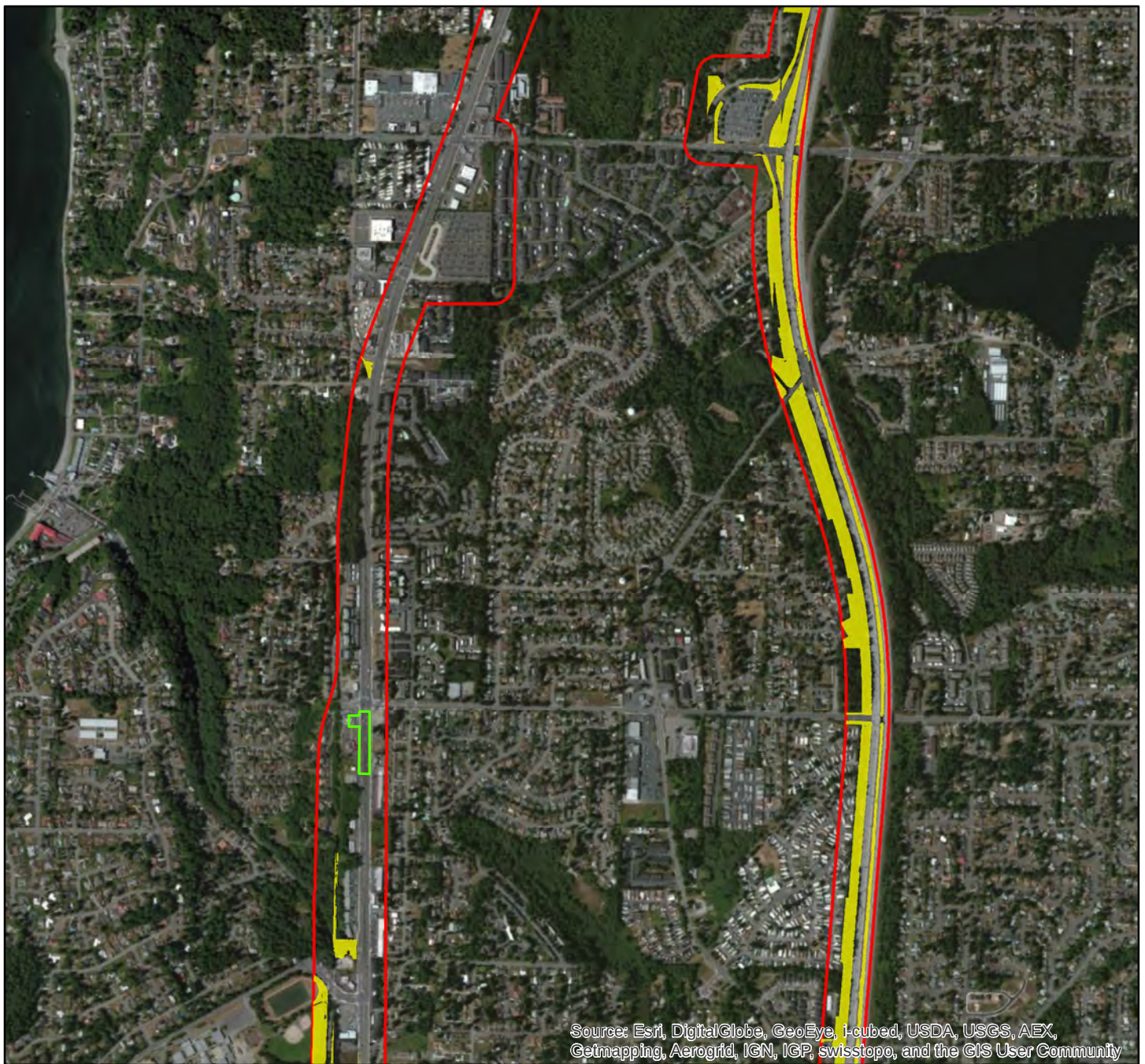


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
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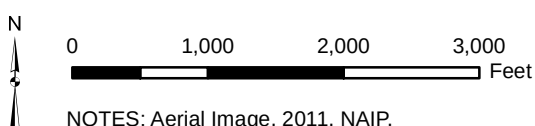
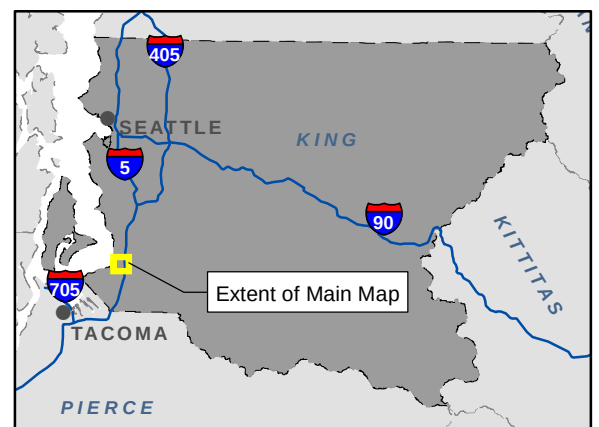
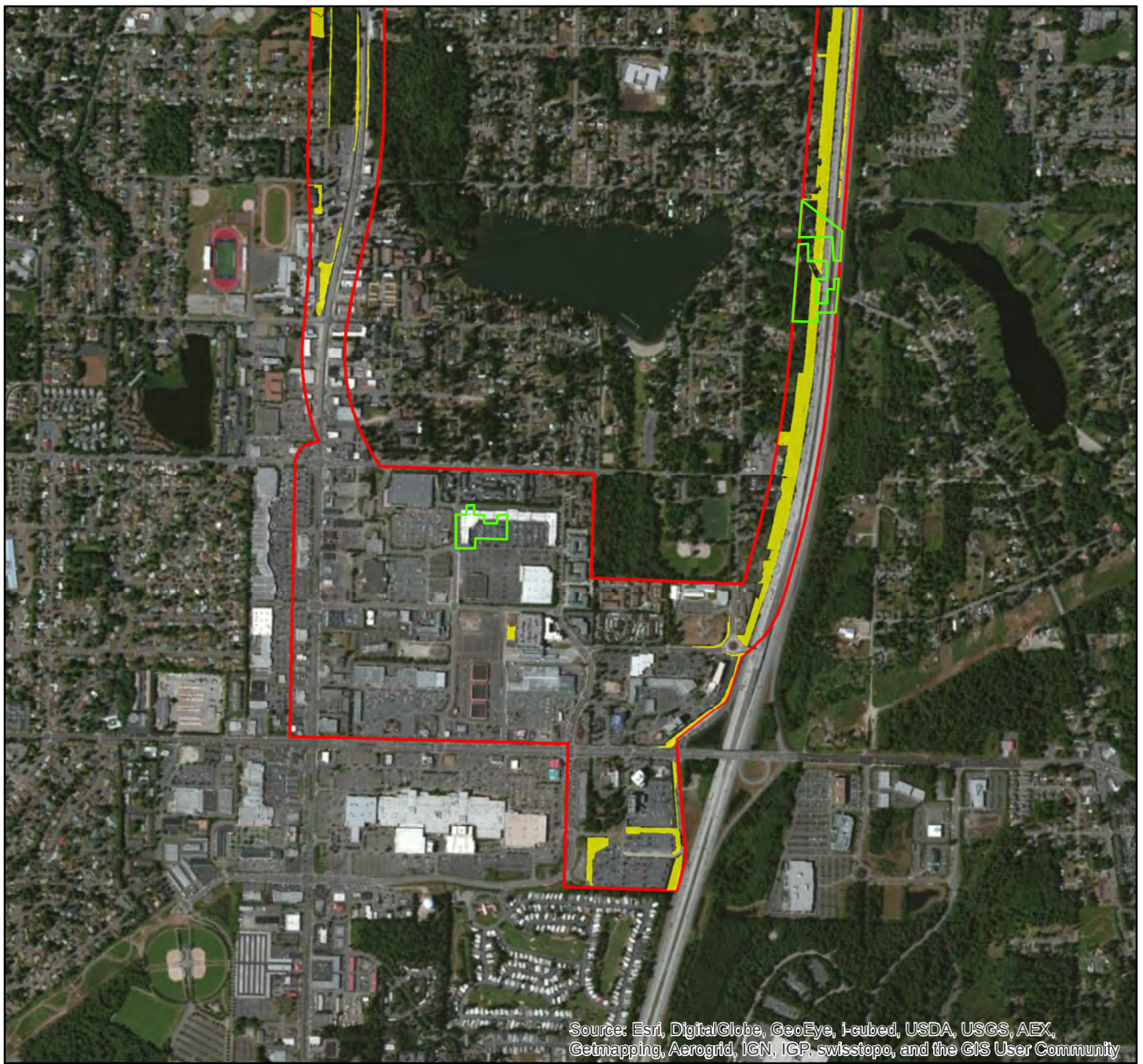


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

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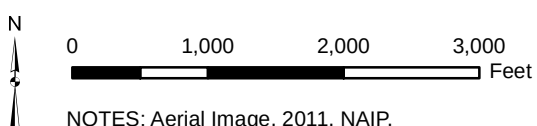
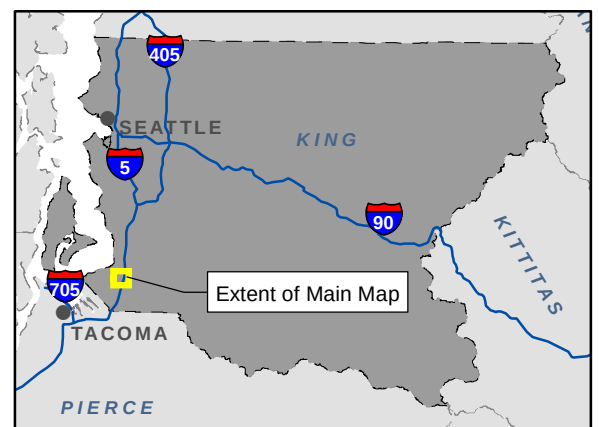


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA

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U.S. Department
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**Federal Transit
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REGION X
Alaska, Idaho, Oregon,
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915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

April 28, 2014

Michael Houser
State Architectural Historian
Department of Archaeology and Historic Preservation
PO Box 148343
Olympia, WA 98504-8343

**Re: Sound Transit: Federal Way Link Extension
Log No. 102912-18-FTA
Highline Water District Property Eligibility Determination**

Dear Mr. Houser:

Thank you for reviewing the Historic Property Inventory (HPI) forms that FTA submitted for the Federal Way Link Extension (FWLE) project on February 20, 2014. An HPI form for the water tanks owned by the Highline Water District (King County District 75 Water Tanks) was included in the February submission. FTA determined that the Highline Water District property is not eligible for the National Register of Historic Places (NRHP); as you know, however, the Department of Archaeology and Historic Preservation (DAHP) disagreed with this finding on March 14, 2014.

In response to your invitation at a subsequent meeting, FTA submits the following additional information and discussion supporting our conclusion that the water tanks are not eligible.

Background

The Highline Water District property has four individual structures: two elevated water towers, and two ground-level tanks. The FWLE I-5 Alternative would necessarily remove the largest ground-level water tank. The tank would likely be replaced elsewhere on the same property to provide an up-to-date and functionally equivalent water storage structure. The other three structures would not be physically impacted by the I-5 Alternative.

Previous Documentation

DAHP's database includes HPI forms for the two elevated water towers from December 2012, under a survey entitled "Mansion Hill SE73XC001 cellular." These forms (attached for your

convenience) were prepared by a cellular telephone company for the Federal Communications Commission (FCC). The FCC documentation states that “the water tower[s] retains sufficient integrity to be potentially eligible for the NRHP under Criterion C.” However, the HPI addresses only the structures’ integrity and does not describe how or even which part of Criterion C the elevated water towers meet. The HPI form does not explain the structures’ significance and provides no historic context in which to consider any potential significance. DAHP concurred with the determination of potential eligibility in January 2013.

Criterion C Requirements and Guidance

You are deeply knowledgeable about the regulatory requirements surrounding Criterion C, but the brief summary below provides helpful context for the water tower discussion.

Criterion C states that the quality of significance in American history is present in structures that possess integrity and that “embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.” 36 CFR 60.4(c).

The National Park Service’s Bulletin 15 provides guidance on how to apply the criteria for NRHP eligibility evaluations. Bulletin 15 makes clear that eligible properties (under any criteria) must be significant and must be evaluated within their historic context: “To qualify for the National Register, a property must be significant; that is, it must represent a significant part of the history, architecture, archeology, engineering, or culture of an area....The significance of a historic property can be judged and explained only when it is evaluated within its historic context” (pg. 7). With respect to Criterion C specifically (discussed at pp. 17-20), it states:

- “This criterion applies to properties *significant for their physical design or construction...*” [emphasis added].
- “A structure is eligible as a specimen of its type or period of construction if it is *an important example (within its context)* of building practices of a particular time in history” [emphasis added].
- “[T]he first requirement, that properties ‘embody the distinctive characteristics of a type, period, or method of construction,’ refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history. ... To be eligible under this portion of the Criterion, a property must clearly illustrate, through ‘distinctive characteristics,’ the following:
 - The pattern of features common to a particular class of resources,
 - The individuality or variation of features that occurs within the class,
 - The evolution of that class, or
 - The transition between classes of resources.”

- “A property is not eligible, however, simply because it has been identified as the only such property ever fabricated; *it must be demonstrated to be significant as well*” [emphasis added].

FWLE Evaluation

In accordance with 36 CFR 800.4(c)(1), which allows an agency official to reevaluate properties previously determined eligible for the NRHP due to “incomplete prior evaluations,” FTA submitted an HPI form addressing all four structures on the Highline Water District property. The FWLE HPI form recognized that the tanks retain integrity but also addressed Criterion C’s other requirements for finding eligibility, concluding:

The property is not eligible for the NRHP under Criterion C as it contains typical elevated water towers and ground level tanks that lack any distinguishing features and do not embody the distinctive characteristics of a type, period, or method of construction; they are not the work of a master and do not possess high artistic value. Many water storage structures in the United States have been recognized for their architectural significance and unique designs, but these four structures are unremarkable and thousands of similar ones exist throughout the country. In addition, the Highline Water District itself has nine similar water storage structures, so these four are not unique to the area. . .

In other words, the water tank lacks significance not only because there are thousands of similar structures, but because “it lacks any distinguishing features” and “does not embody the distinctive features of a type, period, or method of construction.”

- It is not clear what “pattern of features” is particular to this class of resources, and the 2012 HPI form did not identify any. Brief research conducted by Sound Transit’s historic preservation professionals found no discernible pattern. The Highline water tanks are devoid of stylistic architectural features or unique engineering qualities, so the patterns normally discussed under this criteria do not apply.
- The 2012 HPI form also failed to identify any distinctive characteristics that water tanks might possess which could convey the design or fabrication of earlier people. Some water towers are elevated, some are not; most are oval or round in shape with a top that is curved to shed water; they are constructed primarily of metal, but sometimes wood; some sit on multiple pilings while some have only a single pylon. In summary, they are typical, unremarkable examples of simple, utilitarian structures. There is also no distinct individuality or variation of features within the class, and the property in question does not demonstrate any evolution or transition.
- The 2012 HPI form gave no historic context for evaluating significance. Context is critical for determining whether the water tower is an important example (as opposed to just a typical example). As described above, an eligibility finding requires that a building be an important (not just typical) example within its context. The FWLE HPI form includes context for both the development of the community and the history of the

Highline Water District and, as noted, finds the structures are not significant elements within that context.

Conclusion

While the water tank retains integrity and may be representative of its period, FTA finds that the available information (including the 2012 HPI form) does not allow us to conclude that it is significant in terms of NRHP criteria. FTA therefore invites DAHP to reconsider its determination that the Highline Water District property is eligible for the NRHP. If DAHP continues to find the property significant, we would like to request a meeting to discuss next steps.

Please contact Steve Saxton (FTA) at 206-220-4311 or james.saxton@dot.gov or Kent Hale (Sound Transit) at 206-398-5103 or Kent.Hale@soundtransit.org if you have any questions. Thank you for your assistance.

Sincerely,



Kenneth A. Feldman
Deputy Regional Administrator

cc (by email): Kent Hale, Sound Transit

July 3, 2014

Mr. Steve Saxton
Federal Transit Administration
915 2nd Avenue
Federal Building, Suite 3142
Seattle, WA 98174-1002

In future correspondence please refer to:
Log: 102912-18-FTA
Property: Federal Way Link Transit Extension
Re: Highline Water District – Water Tanks

Dear Mr. Saxton:

Thank you for contacting our office. I have carefully reviewed the additional materials you provided to our office for the various water tanks associated with the Highline Water District. Thank you for sending those. This resource includes four individual objects: two elevated water towers and two ground level water towers. The collection of object was recorded on one HPIF.

After consulting with other colleagues in the office and other SHPO's across the county, I stand by my initial assessment that the towers are ELIGIBLE for listing on the National Register of Historic Places. The towers are significant under criteria C as resources that *"embody the distinguishing characteristics of their type and period of construction"*. The collection of towers were built by the Horton Tank Co., a subsidiary of the Chicago Bridge & Iron Company; proprietors, engineers and erectors of water towers, standpipes, oil tanks, gas holders, and smoke stacks. This company is an international business who's products have a have a deep and long-lasting impact on the development of countless communities across the US. Additionally their projects have added in the growth of thousands of business and military bases across the globe. The collection of tanks in Highline, represents a collection of several types and models of tanks, thus demonstrating in one location, characteristics of water tanks over a period of time.

Additionally, the water tanks are eligible under criteria A for their direct contribution to the broad patterns of growth and development of the Highline community. Without such tanks, the community would not have been able to establish itself, nor growth beyond the initial aspirations of the communities founders.

Keep in mind that this determination does not stop the plans of the Sound Transit Light Rail system. Under Section 106, the review is a process which requires consultation and mitigation when eligible resources are effected with the simple idea of being good stewards of cultural resources.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,



Michael Houser
State Architectural Historian
(360) 586-3076 michael.houser@dahp.wa.gov



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

August 18, 2014

Mr. Steve Saxton
Federal Transit Administration
915 2nd Avenue
Federal Building, Suite 3142
Seattle, WA 98174-1002

In future correspondence please refer to:
Log: 102912-18-FTA
Property: Federal Way Link Transit Extension
Re: Highline Water District Clarification

Dear Mr. Saxton:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The Federal Way Link Transit Extension has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

In our continuing discussion regarding the water features associated with the Highline Water District (one elevated tower constructed in 1950, one elevated tower constructed in 1962, one ground-level tank constructed in 1959, and one ground-level tank constructed in 1968), DAHP has reconsidered its National Register of Historic Places eligibility evaluation of this group of features. While the two elevated towers and the 1959 ground-level tank may be eligible for listing in the National Register of Historic Places (NRHP), the analysis of the water system in terms of the development of Highline is completely lacking. In the absence of a developed context describing the relationship of the water retention features to the Highline community, we should not consider the features as a cohesive group.

Additionally, Criterion C needs to be expanded to discuss the water towers and tanks as examples of a type. cursory research into the history of the Chicago Bridge and Iron Co., and their subsidiary the Horton Tank Company, indicates that the company built over 25,000 of these things so a property type could be established. It may have already been established as part of other context statements or nominations but neither the HPI nor anyone's letters detailed this information. Thus, we cannot find these individually eligible but they may be contributing features of either the water system district, or a larger residential district that may have not been surveyed. In any case, the information has not been presented to make a definitive decision.

In any case, we cannot find any justification to determine the 1968 ground-level water tank eligible for listing in the NRHP. It does not meet the 50-year timeline, would not be individually eligible, and does not meet the criteria of exceptional significance. A possible solution to the issue may require a re-evaluation of the area of potential effects (APE) for this alternative, narrowing the APE to include only structures that will be physically impacted or removed as a



result of the project. If the remaining three water features will be avoided by physical impacts resulting from the undertaking, their NRHP eligibility evaluation can be revisited in the future.

We look forward to continuing consultation on this issue. If you have any questions or require clarification of any kind, please don't hesitate to contact me.

Thank you for the opportunity to review and comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt Sterner", with a long horizontal flourish extending to the right.

Matthew Sterner, M.A.
Transportation Archaeologist
(360) 586-3082
matthew.sterner@dahp.wa.gov

Cc: Dan Drais, FTA





U.S. Department
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**Federal Transit
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206-220-7954
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August 29, 2014

Matthew Sterner
State Historic Preservation Officer
Department of Archaeology and Historic Preservation
PO Box 48343
Olympia, WA 98504-8343

Re: Sound Transit Federal Way Link Extension
DAHP Log: 102912-18-FTA Preliminary Draft Historic and Archaeological Technical Report

Dear Mr. Sterner:

The Federal Transit Administration (FTA) and Sound Transit are preparing environmental documentation for the Federal Way Link Extension (FWLE), which extends light rail from SeaTac to Federal Way in King County, Washington. FTA initiated Section 106 consultation on the project in June 2013 and the Department of Archaeology and Historic Preservation (DAHP) concurred with the area of potential effect (APE) in December 2013. FTA and Sound Transit are now developing the Draft Environmental Impact Statement (DEIS) for the project.

In accordance with Section 106 of the National Historic Preservation Act and as a part of our continuing consultation, FTA is submitting the preliminary Draft Historic and Archaeological Resources Technical Report for the Draft EIS for your review and comment. An executive summary of the preliminary Draft EIS, also included, describes the project background and alternatives evaluated. Finally, a CD with the entire Draft EIS is included with the Executive Summary.

Your comments on the preliminary Draft Historic and Archaeological Resources Technical Report are requested by September 29, 2014. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or at kent.hale@soundtransit.org.

Sincerely,

R.F. Krochalis
Regional Administrator

Enclosure: Preliminary Draft Historic and Archaeological Technical Report
Preliminary Draft EIS Executive Summary with CD

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August 29, 2014

Virginia Cross
Tribal Chair
Muckleshoot Indian Tribe
39015 172nd Ave SE
Auburn, WA 98092

**Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological and Ecosystems Technical Reports**

The Honorable Virginia Cross:

In a letter dated June 11, 2013, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Federal Way Link Extension. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2014 FTA invited the tribe's comments on the APE and the archaeological survey plan.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, FTA submits to you for review and comment the preliminary Draft Historic and Archaeological Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. An executive summary of the preliminary Draft EIS, also included, describes the project background and alternatives evaluated. Finally, a CD with the entire Draft EIS is included with the Executive Summary.

Your comments are requested by September 29, 2014. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or at kent.hale@soundtransit.org.

Sincerely,

R.F. Krochalis
Regional Administrator

Enclosures: Preliminary Draft Historic and Archaeological Technical Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

cc: Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe
Karen Walter, Natural Resources, Muckleshoot Indian Tribe
Matthew Sterner, Department of Archaeology and Historic Preservation
Kent Hale, Sound Transit

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Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

August 29, 2014

Bill Sterud
Tribal Chair
Puyallup Tribe of Indians
3009 Portland Ave
Tacoma, WA 98404

**Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological and Ecosystems Technical Reports**

The Honorable Bill Sterud:

In a letter dated June 11, 2013, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Federal Way Link Extension. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2014 FTA invited the tribe's comments on the APE and the archaeological survey plan.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, FTA submits to you for review and comment the preliminary Draft Historic and Archaeological Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. An executive summary of the preliminary Draft EIS, also included, describes the project background and alternatives evaluated. Finally, a CD with the entire Draft EIS is included with the Executive Summary.

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Sincerely,

R.F. Krochalis
Regional Administrator

Enclosures: Preliminary Draft Historic and Archaeological Technical Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

cc: Brandon Reynon, Cultural Resources, Puyallup Tribe
Bill Sullivan, Natural Resources, Puyallup Tribe
Matthew Sterner, Department of Archaeology and Historic Preservation
Kent Hale, Sound Transit

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August 29, 2014

Carolyn Lubenau
Tribal Chair
Snoqualmie Indian Tribe
PO Box 969
Snoqualmie, WA 98065

**Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological and Ecosystems Technical Reports**

The Honorable Carolyn Lubenau:

In a letter dated June 11, 2013, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Federal Way Link Extension. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2014 FTA invited the tribe's comments on the APE and the archaeological survey plan.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, FTA submits to you for review and comments the preliminary Draft Historic and Archaeological Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. An executive summary of the preliminary Draft EIS, also included, describes the project background and alternatives evaluated. Finally, a CD with the entire Draft EIS is included with the Executive Summary.

Your comments are requested by September 29, 2014. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or at kent.hale@soundtransit.org.

Sincerely,

R.F. Krochalis
Regional Administrator

Enclosures: Preliminary Draft Historic and Archaeological Technical Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

cc: Steven Mullen-Moses, Cultural Resources, Snoqualmie Indian Tribe
Cindy Spiry, Natural Resources, Snoqualmie Indian Tribe
Matthew Sterner, Department of Archaeology and Historic Preservation
Kent Hale, Sound Transit

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206-220-7954
206-220-7959 (fax)

August 29, 2014

Shawn Yanity
Tribal Chair
Stillaguamish Tribe of Indians
PO Box 277
Arlington, WA 98223

**Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological and Ecosystems Technical Reports**

The Honorable Shawn Yanity:

In a letter dated June 11, 2013, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Federal Way Link Extension. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2014 FTA invited the tribe's comments on the APE and the archaeological survey plan.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, FTA submits to you for review and comment the preliminary Draft Historic and Archaeological Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. An executive summary of the preliminary Draft EIS, also included, describes the project background and alternatives evaluated. Finally, a CD with the entire Draft EIS is included with the Executive Summary.

Your comments are requested by September 29, 2014. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or at kent.hale@soundtransit.org.

Sincerely,

R.F. Krochalis
Regional Administrator

Enclosures: Preliminary Draft Historic and Archaeological Technical Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

cc: John Miller, Cultural Resources, Stillaguamish Tribe
Pat Stevenson, Natural Resources, Stillaguamish Tribe
Matthew Sterner, Department of Archaeology and Historic Preservation
Kent Hale, Sound Transit

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August 29, 2014

Leonard Forsman
Tribal Chair
Suquamish Tribe
PO Box 498
Suquamish, WA 98392

**Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological and Ecosystems Technical Reports**

The Honorable Leonard Forsman:

In a letter dated June 11, 2013, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Federal Way Link Extension. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2014 FTA invited the tribe's comments on the APE and the archaeological survey plan.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, FTA submits to you for review and comment the preliminary Draft Historic and Archaeological Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. An executive summary of the preliminary Draft EIS, also included, describes the project background and alternatives evaluated. Finally, a CD with the entire Draft EIS is included with the Executive Summary.

Your comments are requested by September 29, 2014. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or at kent.hale@soundtransit.org.

Sincerely,

R.F. Krochalis
Regional Administrator

Enclosures: Preliminary Draft Historic and Archaeological Technical Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

cc: Dennis Lewarch, Cultural Resources, Suquamish Tribe
Alison O'Sullivan, Natural Resources, Suquamish Tribe
Matthew Sterner, Department of Archaeology and Historic Preservation
Kent Hale, Sound Transit

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U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

August 29, 2014

JoDe Goudy
Tribal Chair
Confederated Tribes and Bands of the Yakama Nation
PO Box 151
Toppenish, WA 98948

**Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological and Ecosystems Technical Reports**

The Honorable JoDe Goudy:

In a letter dated June 11, 2013, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Federal Way Link Extension. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2014 FTA invited the tribe's comments on the APE and the archaeological survey plan.

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Sincerely,

R.F. Krochalis
Regional Administrator

Enclosures: Preliminary Draft Historic and Archaeological Technical Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

cc: Johnson Meninick, Cultural Resources, Yakama Nation
Phillip Rigdon, Natural Resources, Yakama Nation
Matthew Sterner, Department of Archaeology and Historic Preservation
Kent Hale, Sound Transit

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August 29, 2014

Cecile A. Hansen, Tribal Chair
Duwamish Tribe
4705 W Marginal Way SW
Seattle, WA 98106

Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological Resources and Ecosystems
Technical Reports

Dear Chair Evans:

Sound Transit initiated consultation Snohomish Tribe in June 2013 for preparation of an Environmental Impact Statement (EIS) for the proposed Federal Way Link Extension project, pursuant to the National Environmental Policy Act (NEPA). Since the initiation of consultation, Sound Transit has identified alternatives for study in the EIS and developed a proposed Area of Potential Effect (APE) for the project. In March 2014 Sound Transit invited the tribe's comments on the APE and the archaeological survey plan.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, we are submitting to you for review and comment the preliminary Draft Historic and Archaeological Resources Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. An executive summary of the preliminary Draft EIS, also included, describes the project background and alternatives evaluated. Finally, a CD with the entire Draft EIS is included with the Executive Summary.

Your comments are requested by September 29, 2014. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact me at (206) 398-5103 or at kent.hale@soundtransit.org.

Sincerely,

Kent Hale
Environmental Planner

Enclosures: Preliminary Draft Historic and Archaeological Resources Technical
Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

Cc: Steve Saxton, Federal Transit Administration
(via e-mail) Matthew Sterner, Department of Archaeology and Historic Preservation

Central Puget Sound Regional Transit Authority • Union Station
401 S. Jackson St., Seattle, WA 98104-2826 • Reception: (206) 398-5000 • FAX: (206) 398-5499
www.soundtransit.org

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King County Councilmember

Peter von Reichbauer
King County Councilmember

CHIEF EXECUTIVE OFFICER

Joni Earl

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August 29, 2014

Michael Evans, Tribal Chair
Snohomish Tribe
11014 19th Ave SE Ste#8, PMB #101
Everett, WA 98208

Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological Resources and Ecosystems
Technical Reports

Dear Chair Evans:

Sound Transit initiated consultation Snohomish Tribe in June 2013 for preparation of an Environmental Impact Statement (EIS) for the proposed Federal Way Link Extension project, pursuant to the National Environmental Policy Act (NEPA). Since the initiation of consultation, Sound Transit has identified alternatives for study in the EIS and developed a proposed Area of Potential Effect (APE) for the project. In March 2014 Sound Transit invited the tribe's comments on the APE and the archaeological survey plan.

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Your comments are requested by September 29, 2014. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact me at (206) 398-5103 or at kent.hale@soundtransit.org.

Sincerely,

Kent Hale
Environmental Planner

Enclosures: Preliminary Draft Historic and Archaeological Resources Technical
Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

Cc: Steve Saxton, Federal Transit Administration
(via e-mail) Matthew Sterner, Department of Archaeology and Historic Preservation

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*Washington State Secretary of
Transportation*

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King County Council Chair

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King County Councilmember

Peter von Reichbauer
King County Councilmember

CHIEF EXECUTIVE OFFICER

Joni Earl

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October 2, 2014

Mr. Richard F. Krochalis
Regional Administrator
Federal Transit Administration
915 Second Avenue
Federal Building, Suite 3142
Seattle, Washington 98174-1002

Attn: Steve Saxton

In future correspondence please refer to:

Log: 102912-18-FTA

Property: Federal Way Link Transit Extension

Re: Historic Property Inventory Forms – Batch 2

Dear Mr. Krochalis:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The above referenced property has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

The table attached to your correspondence contains determinations of eligibility on (384) properties that have not previously been evaluated. However, (8) additional properties were submitted to HPI that are not accounted for in the table. These (8) properties have been evaluated, as well. Of the (392) new HPI forms submitted, we concur that (386) are ineligible for inclusion on the National Register under Criterion C. However, we cannot concur with your determination that the following (6) properties are ineligible for the National Register without further evaluation:

- 1436 S 312th St, Federal Way (US Bank)
- 23226 30th Ave S, Des Moines (King's Arms Motel)
- 23418 Pacific Hwy S, Kent (Dollar Tree)
- 23616 Pacific Hwy S, Kent (Midway Moto Sports Auto Sales)
- 28631 Pacific Hwy S, Federal Way (J n B Furniture)
- 23454 30th Ave S, Kent (Life Saver) – not included on table

Please submit a more in-depth evaluation of the architectural significance of each of the abovementioned properties under Criterion C. The only evaluation of architectural significance for each of these properties submitted to HPI is a boilerplate statements that read: *"The property is not eligible for the NRHP under Criterion C as it contains typical mid-twentieth century commercial retail buildings and does not embody the distinctive characteristics of a type, period, or method of construction; it is not the work of a master and does not possess high artistic*

value.” This overly generic statement is not a fair evaluation of these properties, and should be expanded upon.

Though typical to the mid-twentieth century, architectural features on the abovementioned properties appear to be distinctive characteristics that are contrary to your evaluation. To say that a property is not eligible under Criterion C *because* it contains typical features of a particular era is antithetical to the notion that a historic property should convey its architectural significance through features that characterize a particular era, type of building, or style. We recommend additional research and consultation with subject matter experts such as the Society for Commercial Archaeology in order to adequately evaluate these properties’ architectural significance within the context of mid-century modern architecture. You might also consider consulting with or using research tools developed by CalTrans on appropriate evaluation of mid-century modern resources.

We look forward to evaluating the individual resources located at the Highline Water District, and to receiving the additional requested information regarding the (6) properties above in order to complete our evaluation. Thank you for the opportunity to review and comment. Should you have any questions, please contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nick Vann".

Nicholas Vann, AIA
Historical Architect
(360) 586-3079
Nicholas.Vann@dahp.wa.gov



Hale, Kent

From: james.saxton@dot.gov
Sent: Thursday, November 20, 2014 2:25 PM
To: matthew.sterner@dahp.wa.gov
Cc: daniel.drais@dot.gov; Hale, Kent; Green, Erin; fta.tro10mail@dot.gov
Subject: O - Sound Transit Federal Way Link Extension, Log No. 102912-18-FTA, Addiitonal Information
Attachments: FWLE Combined Revised HPI Forms 10-27-14.pdf

Matthew,

FTA submitted HPI forms to DAHP on February 20th and August 28th, 2014 for the Federal Way Link Extension (FWLE). In the August 18, 2014 letter, DAHP noted that additional information is needed on the King County District 75 water tanks and that the four tanks should be evaluated separately. DAHP also requested additional information in the October 2, 2014 letter on the following six properties:

- 436 S 312th St, Federal Way (US Bank)
- 23226 30th Ave S, Des Moines (King's Arms Motel)
- 23418 Pacific Hwy S, Kent (Dollar Tree)
- 23616 Pacific Hwy S, Kent (Midway Moto Sports Auto Sales)
- 28631 Pacific Hwy S, Federal Way (J n B Furniture)
- 23454 30th Ave S, Kent (Life Saver)

To address DAHP's request, revised HPI forms have been prepared. Four new forms for each of the water tanks have been submitted in WISAARD. Updated HPI forms for the six other properties have also been submitted in WISAARD and are linked to the forms previously submitted in August.

Based on the information included in the HPI forms, none of the properties meet the National Register criteria. Therefore, FTA requests your concurrence with the finding that all ten properties are not eligible for listing in the National Register of Historic Places.

Please contact Steve Saxton (FTA) at 206-220-4311 or james.saxton@dot.gov or Kent Hale (Sound Transit) at 206-398-5103 or Kent.Hale@soundtransit.org if you have any questions. Thank you for your assistance.

Steve Saxton
FTA, Region 10
206-220-4311

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

December 24, 2014

Mr. Richard F. Krochalis
Federal Transit Administration
915 Second Avenue
Federal Building, Suite 3142
Seattle, Washington 98174-1002

In future correspondence please refer to:

Log: 102912-18-FTA

Property: Federal Way Link Transit Extension

Re: Re-Evaluation of Cultural Resources Report, Determined Eligible

Dear Mr. Krochalis:

As a result of comments made during a recent meeting between the Department of Archaeology and Historic Preservation (DAHP), the Federal Transit Administration (FTA), and Sound Transit, I am drafting this letter to clarify DAHP's progress in the Section 106 review of the Federal Way Link Transit Extension project. Based upon ongoing discussions and evaluations following the submittal of the Historic and Archaeological Technical Report to DAHP in August of this year, to date, DAHP believes the following historic properties that fall within the area of potential effect (APE) for the project are eligible for listing in the National Register of Historic Places (NRHP):

- the US Bank Building located at 1436 S 312th St., Federal Way,
- five structures associated with the Highline Community College, 2400 S 240th St, Des Moines, and
- the Calvary Lutheran Church located at 2415 S 320th St., Federal Way.

DAHP feels that the four water storage tanks located at 21420 31st Ave S, SeaTac, part of the Highline Water District, are not eligible for listing in the NRHP. Finally, we also concur with your determination that the remaining 398 historic properties submitted to our office for review are not eligible for listing in the NRHP.

Regarding the Phase I archaeological investigation that was undertaken for the technical report, I have no concerns with the work that has been performed to date and presented in the report. That said, I fully expect that FTA and Sound Transit realize that more intensive archaeological investigation will be required following the selection of the preferred alternative for the project. The Phase I investigation that was performed provides an excellent broad stroke of expectations regarding the archaeological environment but falls far short of properly evaluating the potential to impact intact archaeological resources within the proposed corridor. Once a preferred alternative is selected, a more robust evaluation of potential effects will be expected.

As always, DAHP appreciates receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4) and the survey report when it is available.



These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800.

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew Sterner", with a long horizontal flourish extending to the right.

Matthew Sterner, M.A.
Transportation Archaeologist
(360) 586-3082
matthew.sterner@dahp.wa.gov

Cc: Kent Hale, Sound Transit



Appendix E
Historic Property Inventory Forms

Historic Property Inventory Forms

Available on request.