



Cultural Resource Consultants

Cultural Resources Assessment for the Fort Lawton Army Reserve Center Redevelopment Project SEIS, Seattle, King County, Washington

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and
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Executive Summary

This report presents methods and results of a cultural resources analysis for the Fort Lawton Army Reserve Center Redevelopment Project Supplemental Environmental Impact Statement (SEIS) in Seattle, King County, Washington. This project is seeking redevelopment within the Fort Lawton U.S. Army Reserve Center (USARC), located in the Magnolia neighborhood, to provide supportive and affordable housing. EA Engineering, Science, and Technology, Inc., PBC (EA) requested that Cultural Resource Consultants (CRC) prepare this cultural resources analysis to ensure that potential impacts to cultural resources are considered in the proposal in accordance with the Washington State Environmental Policy Act (SEPA), and other applicable regulations. CRC's investigations to date have included review of relevant background literature and maps, records on file at the Washington State Department of Archaeology and Historic Preservation (DAHP), and available project plans and related information; correspondence with area tribes; as well as field investigations.

This report updates the cultural resources technical report prepared for the 2018 EIS (Berger and McNett 2017) to address the current proposal. Literature review and reconnaissance survey were conducted. No previously recorded archaeological sites are in or adjacent to the project. The Fort Lawton location is considered to have a low potential to contain as-yet unknown archaeological sites due to the extent of prior ground disturbance in a non-depositional setting on a glacial landform. Previously recorded historic sites are present within Fort Lawton USARC, and would be directly impacted by the Proposed Action. However, the potential for significant impacts is limited to the NRHP-eligible Fort Lawton Post Cemetery. All other historic resources within the project are recommended not eligible for historic registers. Measures are recommended to avoid, minimize, and mitigate significant impacts to cultural resources.

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Introduction

Cultural Resource Consultants (CRC) was retained by EA Engineering, Science, and Technology, Inc., PBC (EA) to conduct a cultural resources analysis for the Fort Lawton Housing Redevelopment Project Supplemental Environmental Impact Statement (EIS) in Seattle, King County, Washington. This project is seeking redevelopment within the Fort Lawton U.S. Army Reserve Center (USARC), located in the Magnolia neighborhood, to provide supportive and affordable housing. A Proposed Action Alternative and No Action Alternative were considered in the analysis. The goal of CRC's assessment for the EIS was to identify any previously recorded cultural resources in the project area, and evaluate the potential for archaeological and historic sites to be impacted by redevelopment under the alternatives.

Assessment methods included a review of previous ethnographic, historical, and archaeological investigations onsite and in the local area, a records search at the Washington State Department of Archaeology and Historic Preservation (DAHP) for known sites in the immediate area, and review of relevant background literature and maps (including General Land Office [GLO], United States Geological Service [USGS], and county atlases), as well as pedestrian survey and subsurface testing. Consideration of the project's potential impacts to cultural resources was based upon review of available project information provided by EA, and the local archaeological, historical, and ethnographic records. On November 25, 2024, CRC also contacted the cultural resources department at the Duwamish Tribal Organization, Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, and Suquamish Tribe to inquire about project-related cultural information or concerns on a technical staff-to-technical staff basis (Attachment A). This was not intended to be or intended to replace formal government-to-government consultation. A Suquamish Tribe archaeologist responded indicating that an ethnographic place name was recorded in the vicinity. Duwamish Tribal Historic Preservation also responded with information about an ethnographic place name and indicated that the Magnolia area was most likely used for hunting and possible gathering and managing resources. This assessment utilized a research design that considered previous studies, the magnitude and nature of the undertaking, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the area of potential impacts, as well as other applicable laws, standards, and guidelines (per 36CFR800.4 (b)(1)) (DAHP 2023).

Regulatory Framework

CRC's work was intended, in part, to assist in addressing state regulations pertaining to the identification and protection of cultural resources (e.g., RCW 27.44, RCW 27.53); compliance with the Washington State Environmental Policy Act (SEPA); and compliance with Seattle Municipal Code Chapter 25.12 (Landmarks Preservation Ordinance). The project will require disposal of the USARC property out of federal ownership, which will constitute a federal undertaking subject to the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA). Compliance with these federal regulations for the disposal action is being addressed by the Army in a separate document.

The Archaeological Sites and Resources Act (RCW 27.53) prohibits knowingly disturbing archaeological sites without a permit from the Washington State Department of Archaeology and Historic Preservation (DAHP), and the Indian Graves and Records Act (RCW 27.44) prohibits knowingly disturbing Native American or historic graves. Under SEPA, agencies must consider

the environmental consequences of a proposal, including impacts to cultural resources, before taking action.

All projects that involve changes to a City landmark must follow Seattle Municipal Code Chapter 25.12 (Landmarks Preservation Ordinance). Projects involving City of Seattle landmarks must submit an application for a Certificate of Approval before they can submit their Master Use Permit (MUP) application or Construction Permit application. The following changes require a Certificate of Approval before work can begin, even if no permit from the Department of Construction and Inspections is required:

- Any change to the exterior of any building or structure;
- Installation of any new sign or changes to existing signs;
- A change in the color the building or structure is painted;
- Any change in a public right-of-way or other public space, including parks and sidewalks (e.g., sidewalk displays, street lights, etc.);
- New construction;
- Demolition of any building or structure;
- Changes to the interior that show from the street, changes to individual business spaces in the Pike Place Market, and changes to the interior of some landmark buildings;
- Site alterations in some cases; or
- A proposed new business or service or an expansion of current use in some cases (DON 2015).

Furthermore, if a project is proposed adjacent to or across the street from a designated landmark, the decision-maker shall refer the proposal to the City's Historic Preservation Officer for an assessment of any adverse impacts on the designated landmark and for comments on possible mitigating measures. Mitigation may be required to insure the compatibility of the proposed project with the character of the designated landmark and to reduce impacts on the character of the landmark's site. Possible mitigating measures include sympathetic facade treatment, sympathetic street treatment, sympathetic design treatment, or reconfiguration of the project and/or relocation of the project on the project site (DON 2015).

For projects involving structures or sites that are not yet designated as historical landmarks but which appear to meet the criteria for designation, the decision maker or any interested person may refer the site or structure to the Landmarks Preservation Board (LPB) for consideration. If the LPB approves the site or structure for nomination as an historic landmark, consideration of the site or structure for designation as an historic landmark and application of controls and incentives shall proceed as set forth in the Landmarks Preservation Ordinance. At the public meeting on designation, the Landmarks Preservation Board receives evidence and hears arguments as to whether the site, building or object meets the standards for designation. If the Board does not designate the property, the proceedings terminate and the property cannot be considered for designation for five years, except at the request of the owner. If the site or structure is rejected for nomination, the project shall not be conditioned or denied for historical preservation purposes unless sites of archaeological significance or adjacent designated landmarks are present (DON 2015).

Project Description

The applicant, Seattle Office of Housing (Office of Housing), is proposing redevelopment of the Fort Lawton Army Reserve Center site (site), including housing and park uses. The site is located in the Magnolia neighborhood in northwest Seattle. The City's goals are to produce supportive housing for formerly homeless people and affordable rental and ownership housing for low-income families and individuals, as well as create public park uses (including both active and passive uses) and meet park maintenance needs. It is expected that full buildout of the Fort Lawton Project would occur by 2032. However, actual buildout could depend on specific economic and market conditions. As discussed in Chapter 2 of the SEIS, the City identified a Proposed Action and a No Action Alternative during scoping.

The approximately 34-acre Fort Lawton Army Reserve Center site contains six buildings and four smaller structures (sheds, pumphouse, and a smokestack) and is located at 4570 Texas Way W in the Magnolia neighborhood in northwest Seattle. The site is bordered by W Lawton Street to the north, 36th Avenue West to the east, W Government Way to the south and Discovery Park to the west. The site is in the SW¼ of the SE¼ of Section 10 and NW¼ of the NE¼ of Section 15, Township 25 North, Range 3 East. W.M. (Figures 1 and 2).

For the purposes of this assessment, the area of potential impacts to cultural resources is considered to be the Fort Lawton Army Reserve Center site as described above and shown in Figures 1 and 2. This area is anticipated to include all proposed redevelopment as described below and in Chapter 2 of the SEIS.

Alternative 1 (Proposed Action) – Mixed Income Affordable Housing and Public Park Uses

Under this alternative, development would feature a mix of affordable housing. Because of the evolving nature of affordable housing needs and the potential for public funding which require flexibility to respond to these evolving factors, the exact mix of housing types and specific locations of buildings is not defined. Rather, a site plan reflecting reasonable worst-case assumptions is identified to represent implementation of the Proposed Action and allow for comprehensive environmental review. The eventual finalized site plan would not exceed 500 housing units, with all buildings located within the housing area of the site (LR-2 zoned area) and consistent with the LR-2 zone height limit of 40-feet, as reflected in SEIS Alternative 1.

All the Fort Lawton Army Reserve Center buildings, except OMS - Building 245, would be demolished and removed. OMS - Building 245 and the associated surface parking area and driveways in the north part of the Fort Lawton site would be retained. These facilities would be used for parks maintenance purposes by SPR. No new infrastructure would be required for the building. Controlled access to the maintenance building parking area would be available from a driveway off of Texas Way.

A total of 13 acres of the site would be provided for passive recreation activities. Existing wooded areas in the north and south parts of the site would be preserved in their natural condition. Passive parks would be located within the housing area in the central portion of the site, including a children's play area(s). Up to 4.7 acres of forest land owned by the U.S. Army in the west portion of the site could be dedicated to Discovery Park. All park facilities would be

designed and constructed to Seattle Parks and Recreation (SPR) standards, and would be owned and maintained by SPR.

A total of 5.1 acres of the site would be developed for active recreation activities. Two unlit grass multi-purpose fields would be located in the central portion of the site, to the south of the housing area. These fields could be configured in a variety of orientations for different uses, including structured and unstructured activities (structured activities include activities such as sports practices and games during daylight hours).

This alternative would require new water, sewer, stormwater, electrical and solid waste service for development. Necessary utility extensions would be made to serve development. A temporary stormwater control system would be installed for construction and a permanent stormwater control system for the operation of the project. Site grading for the residential and recreation uses and associated infrastructure would occur during initial site preparation and during all subsequent phases of site redevelopment. As much as possible, buildings, fields and infrastructure would be designed to conform to the existing site topography and minimal grading is anticipated.

The primary access point to the site would continue to be from the south via the intersection of Texas Way W and W Government Way. Access would also continue to be available from the north via the intersection of Texas Way W and 40th Avenue W. Texas Way W would be generally maintained in its current configuration but improved consistent with a “Park Boulevard” as defined by SMC 15.02.046 and would be similar to other roadways through Discovery Park. The existing 30-ft wide roadway would be widened to 42 feet and street trees would be added to the east side of the street. Other new residential streets would be developed onsite to serve development. Sidewalks and trails would be located throughout the site to provide opportunities for non-motorized circulation. Texas Way W would be improved to add a sidewalk or walkway on the east side of the street adjacent to new development areas. In addition, the existing sidewalk on the west side of the street would be maintained.

No Action Alternative

Under the No Action Alternative, the Fort Lawton site would remain in its existing vacant condition. The property would not be conveyed by the U.S. Army to the City of Seattle per the BRAC process. The City would terminate its lease of the property and the Army would resume maintenance of the site and facilities. Buildings and infrastructure would likely continue to deteriorate. The site could be conveyed to the City or conveyed or sold to another entity in the future, and could be developed in accordance with the uses allowed by the site’s current zoning.

Affected Environment

Determining the potential for the project to contain cultural resources was largely based upon review and analysis of previously collected environmental and cultural information for the project area, including the cultural resources technical report prepared for the 2018 EIS (Berger and McNett 2017). Environmental and cultural context information for this project is derived from relevant published reports, articles, and books (e.g., Larson and Lewarch 1995; Suttles and Lane 1990); *Archaeology of King County, Washington: A Context Statement for Native American Archaeological Resources* (Kopperl et al. 2016); historical maps and documents (e.g.,

USSG 1855, 1856); geological and soils surveys (e.g., Booth et al. 2005, 2009; WA DNR 2017); ethnographic accounts (e.g., Smith 1940, 1941; Waterman ca. 1920, 2001); and archaeological reports (e.g., Dellert and Lockwood 2018; Stevenson et al. 2018; Wilke and James 1984) in the local area. The following discussion of project area geology, archaeology, history, and ethnography incorporates context information from CRC's prior work in Seattle (e.g., Kassa 2016, 2017) and a cultural resources study completed as a part of an environmental site assessment at Fort Lawton USARC (Groesbeck 2011) by reference.

Environmental Context

The landscape of northwest Washington is a product of crustal deformation initiated by the Cascadia subduction zone; successive glacial scouring and deposition most recently during the Pleistocene; and landslides, erosion and deposition, and human activity during the Holocene (Troost and Booth 2008). The project is within the Willamette-Puget Lowland physiographic province characterized by the wide "trough" between the Coast and Cascade Ranges formed during the advance and retreat of Pleistocene epoch glaciers (Franklin and Dyrness 1973; McKee 1972). During the Late Pleistocene or last glacial period (110,000 to 12,000 years BP), the Cordilleran ice sheet covered much of the American northwest and scoured the landscape during advance and retreat episodes initiated by localized climate fluctuations. The most recent glaciation was the Vashon Stade of the Fraser glaciation during which the Puget Lobe of the Cordilleran ice sheet entered northwest Washington around 17,000 years BP (Thorson 1980). This final glacial advance episode scoured the landscape producing north-trending ridges, extensive drift uplands, moraine features, topographic lows, and deposited glacial till prior to its recession.

The Puget Lobe reached the vicinity of present-day Seattle by about 14,500 years BP achieving its maximum extent near Olympia by 14,000 years BP (Booth et al. 2003). The onset of climatic warming caused the ice sheets to retreat to the north and began the transition into the Holocene. The Puget Lobe retreated past Seattle by roughly 13,600 years BP (Booth et al. 2003). As the glacier receded during this more temperate period, meltwater became impounded behind the ice forming a series of proglacial lakes that eventually merged into Lake Russell, which extended roughly from the southern margin of present-day Whidbey Island to Olympia impounding low lying sections of the Puget Sound and adjacent river valleys (Bretz 1913; Waitt and Thorson 1983). Glacial Lake Russell merged with Lake Bretz before draining via the Strait of Juan de Fuca (Minard and Booth 1988; Thorson 1981). This lake also extended approximately 160 feet above modern sea level (Bretz 1913:123). Marine backwater replaced the draining glacial meltwaters in surficial depressions, which in turn became freshwater lakes once isolated from the marine waters. As glacial meltwaters drained, sheets of outwash were deposited and channels were carved into the local landscape. Salmon Bay, located northeast of the project, is one of these glacial outwash channel features (Galster and Laprade 1991; Porter and Swanson 1998).

While sedimentation was widespread and voluminous during the Pleistocene, deposition during the Holocene has been more restricted, occurring in river valleys and at the base of steep slopes (Booth et al. 2003). Geomorphic processes such as isostatic rebound, global sea level rise, tidal movements, and a large earthquake 1,100 years ago originating from the Seattle fault zone (located south of the project) causing localized subsidence north of the fault (Bucknam et al.

1992) are also factors that have affected the geography of the Puget Sound region to varying degrees during the Holocene (Booth et al. 2003; Thorson 1989).

As the climate stabilized during the Holocene, vegetation returned to the landscape and the climate warmed considerably to contemporary ranges. The project is within the *Tsuga heterophylla* (Western Hemlock) vegetation zone, the most extensive in western Washington. This zone has a wet, mild, maritime climate characterized primarily by Douglas fir (*Pseudotsuga menziesii*), western hemlock (*Tsuga heterophylla*), and western red cedar (*Thuja plicata*) with an understory of sword fern (*Polystichum muritum*), bracken fern (*Pteridium aquilinum*), Oregon grape (*Mahonia aquifolium*), and vine maple (*Acer circinatum*).

Historically, the landscape of Fort Lawton consisted of a forested high terrace and slopes that descended to the north towards the western end of Salmon Bay. Contemporary elevation ranges from 75 to 210 feet above sea level (King County 2017). Steep slopes are present along the north edge of the site. Surface geology mapped in this location consists of Vashon stade (Pleistocene) advance outwash (Booth et al. 2005). This geologic unit consists of well-sorted sand and gravel deposited by streams issuing from the advancing ice sheet (Booth et al. 2005).

Archaeological Context

Thousands of years of human occupation of the Puget Sound have been summarized in a number of archaeological, ethnographic, and historical investigations over the past several decades that provide a regional context for evaluating the project (e.g., Greengo 1983; Kopperl et al. 2010; Larson and Lewarch 1995; Morgan 1999; Nelson 1990). Archaeological evidence suggests the presence of nomadic hunter-gatherers not long after glaciers retreated and catastrophic meltwaters subsided after which landforms stabilized during the late Pleistocene to early Holocene. Consequently, evidence of early human occupation in once glaciated areas is found atop intact glacial sediments, which provide a stratigraphic lower limit for human occupation in these areas. Following deglaciation, subsequent changes to landforms, climate, and vegetation influenced the available resources and, consequently, the spatial distribution of human activities. Similar to elsewhere, human land use was generally structured around the value of natural resources available in local environments including fresh water, terrestrial and marine food resources, forests, and suitable terrain.

Kopperl et al. (2016) developed an archaeological chronologic sequence for King County based on their review of previous cultural history, selectionist, and evolutionary ecological interpretations of western Washington from which they identified a general chronological framework demarcated by changes in the geological, paleobotanical, and archaeological records. Based on their research, they identify five Analytic Periods (AP) that are used to establish an archaeological sensitivity model for King County (discussed in section “3.0 Archaeological Expectations”). Kopperl et al. (2016:10-101) also identified an archaeological resource classification that is first defined by activity association parsed into task intensity then divided into 11 site types. According to their research, based on available data, these site types are represented variably throughout the Analytic Periods and demonstrate an increase in diversity and number of site types over time with an appearance of residential activity, multi-task site types such as villages and base camps in later periods in comparison to the earlier record comprised of more limited-task site types such as specific-resource procurement/processing sites

and specific-resource field camps, in addition to a representation of certain multi-task sites such as multiple-resource field camps. The following provides an overview of the chronological sequence defined for King County (Kopperl et al. 2016:95):

1. Analytic Period 1 (14,000 cal BP and 12,000 cal BP) was a period of relative postglacial environmental stability in Western Washington. During this period, hunter-gatherers began to colonize Western Washington subsequent to the retreat of the Cordilleran Ice Sheet. This period is demarcated by regional climate and vegetation patterns, and estimated arrival of the first hunter-gatherers into the Western Washington region.
2. Analytic Period 2 (12,000 cal BP and 8000 cal BP) is characterized by increasingly sophisticated land use strategies adapted to local environments and the associated shifts of those strategies in regard to regional climate and vegetation patterns.
3. Analytic Period 3 (8000 cal BP and 5000 cal BP) is defined by a shift from a warm, dry climate to a cool, moist climate. During this period, archaeologists have argued that hunter-gatherer subsistence and technology was reorganized in response to the environmental change within this analytic time period.
4. Analytic Period 4 (5000 cal BP and 2500 cal BP) is defined by the appearance of shell middens in the archaeological record of Puget Sound, and the development of old growth Douglas- fir and western hemlock forests within the Puget Lowland. During this period, the majority of the contemporary Duwamish River– Green River Valley had been filled with alluvial sediments. Archaeologists generally recognize shifts in hunter-gatherer economic and technological organization during this period.
5. Analytic Period 5 (2500 cal BP and the commencement of settlement in the area by Euro-Americans about 200 years ago) is defined by developments in hunter-gatherer economic and social patterns and concluding with initial Euro-American contact. The local archaeological record of Puget Sound demonstrates an increase in the number of shell midden sites after 2500 cal BP. The period is also marked by adaptations to localized environmental changes caused by the 1100 cal BP earthquake on the Seattle Fault in addition to probable changes in economic and social organization as a result of Euro-American contact.

Ethnographic Context

The project is located within the traditional territory of the Duwamish a southern South Coast Salish people who spoke Southern Lushootseed; historically, members of Suquamish and Muckleshoot Tribes also utilized this vicinity (Suttles and Lane 1990; Waterman 2001). Major Duwamish winter villages were formerly located on the Cedar, Duwamish, Sammamish, and Black Rivers, Lake Sammamish, Lake Washington, Lake Union, Elliott Bay, and Salmon Bay (Harrington ca. 1909; Smith 1941:207; Waterman ca. 1920, 1922). Each portion of the Duwamish drainage had a name and an associated named community (Miller and Blukis Onat 2004:35). Near Fort Lawton, the north shore of Salmon Bay was home to a Duwamish band known as the Shilsholamish or Shul-shale (Waterman ca. 1920, 1922). Precontact Suquamish settlements were often located on major waterways, and heads of bays or inlets. The Muckleshoot Indian Tribe includes the descendants of an amalgam of tribes that lived in the Green River and White River valleys, including the Skopamish, Smulkamish, Stkamish, Yilalkoamish, and Twakwamish (Suttles and Lane 1990).

Ethnohistoric economies were structured based on seasonally available resources, which translated to seasonal occupation and logistic mobility. Permanent villages were generally

established along rivers during the winter, and temporary camps were used while traveling to obtain seasonal food sources during the warmer summer months. Local Indian people shared many broadly defined traditions with their Puget Sound neighbors, including subsistence emphasis on salmon and other fish, land game, and a wide variety of abundant vegetable foods as well as household and village communities linked by family and exchange relations (Suttles and Lane 1990).

As described by Larson and Lewarch (1995:1-13-14),

The Shilsholamish lived in longhouses along the shore of Salmon Bay and according to Costello (1974:86 [1895]), formerly numbered in the thousands, but were reduced to around 500 due to the attacks on them by native raiders from British Columbia and Alaska. The Shilsholamish numbered a dozen families in 1853 probably as a result of disease. Duwamish elders described three longhouses at Shilshole, including one that was used as a potlatch house (Duwamish et al. 1933:Exhibit W-2). The village at Salmon Bay was on or near waters rich in marine resources including salmon (Collins 1892) and a variety of shellfish. Wandrey (1975) describes the abundance of clams, mussels, oysters, crabs, and shrimp present in Salmon Bay and a typical historic native gathering...The Villagers at Salmon Bay had bountiful marine resources available to them immediately in front of their homes. Their strategic location between Lake Washington and Puget Sound would have been a good position to profit from trade between saltwater and upriver or lake groups. With mutually acceptable trade goods (Wilke and James 1984), Salmon Bay was a conduit between the saltwater Duwamish and Suquamish and the inland groups, such as the Snoqualmie, forming an east to west cultural division similar to saltwater/inland connections in the north and south (Smith 1941). Peripheral areas were probably known to them and utilized in the summer months by certain families who chose to seasonally gather near their winter villages. However, areas such as West Point may not have been defended as territory by the Shilsholamish because of the surplus of resources found in their Salmon Bay home.

Twentieth century ethnographers documented locations of villages and names for resource areas, water bodies, and other cultural or geographic landscape features from local informants (e.g., Snyder 1968; Waterman ca. 1920, 2001). Knowledge of these features contributes to the broader archaeological context of the project location and the nature of the archaeology that may be encountered during this assessment. Near Fort Lawton, Salmon Bay was a thoroughfare for Puget Sound peoples headed east to Lake Washington via canoe and portage seeking resources and trade with neighboring tribes (Waterman 1922). In addition, inland peoples travelled by a trail to Salmon Bay in search of marine foodstuffs (Harrington ca. 1909). Harrington (ca. 1909) provides the name *tselágotsid* for an inlet that occupied southern Interbay, from which canoes could be portaged to Salmon Bay. Waterman (2001:54-56) identified six named places around Salmon Bay between Puget Sound and Lake Union:

- *Tce'dkedäd*, translated as “lying curled on a pillow,” references a small curved promontory in Ballard near the entrance to Salmon Bay. The name of this promontory references the shape of the sand spit, which is curled in. This location was popular for digging clams.
- *Cilco'lutsid*, translated as “mouth of *cilco'l*,” references Salmon Bay. This bay was also referred to as Shul-shale, presumably for the tribe that lived here.

- *Cilco'l*, translated as “threading a bead or something” references the way this narrow estuary invades the shoreline and is the location of a Duwamish village site. Indian peoples used this estuary as a transportation route east to Lake Washington. The *Cilcol-a'bc* tribe lived at the northern shore of Salmon Bay in present day Ballard. At the time Euro-Americans arrived, the headman of the settlement was Shilshole Curly, while the last person to live at this settlement was Indian Charley or *Xwe'Ltctld*.
- *Bl'tda'kt*, translated as “a kind of supernatural power,” references a very small creek that entered the north side of Salmon Bay in proximity to the Fremont Bridge. The power referenced in this name gave an individual the ability to enter the underworld to regain a guardian spirit. At this creek, shamans held dances.
- *Qw³ûla'stab*, translated as “a small bush with white flowers and black berries,” references a small creek, different than the aforementioned, that enters the same inlet.
- *Hwiwa'iq'*, translated as “large, having lots of water,” references a creek that drained into the south shore of Salmon Bay through a gully from the neighborhood of Fort Lawton.

Historic Context

Euro-American exploration of the Puget Sound began in 1792 with Captain Vancouver, followed by the Wilkes Expedition in 1841. Continued settlement of the Oregon Territory, and later the Washington Territory, led to the federal government’s decision to enact the Oregon Donation Land Act of 1850. This act was largely responsible for enticing settlers to the area as well as rewarding those early settlers by providing free land. In 1851, the first Euro-American settlers arrived on Alki Point and established a temporary settlement (Wilma 2001). They later moved across Elliott Bay and established the settlement of Seattle, honoring Indian Chief Sealth of the Duwamish people. Early settlers explored the surrounding landscape and many staked claims under the Oregon Donation Land Act. The new town’s principal economic support was Henry Yesler’s lumber mill at the foot of Mill Street (now Yesler Way), completed in 1853 (Wickwire 2001:9). Washington was established as a territory in the same year, which increased people’s interest in settling the Puget Sound region. Euro-American settlement activity during this period focused on easily accessed areas such as shorelines and river valleys.

Early Euro-American homesteaders and commercial enterprises significantly impacted Native American lifeways on Puget Sound by the middle of the nineteenth century. In 1855, following the signing of the Point Elliot Treaty and others, area tribes were forced to abandon many of their Puget Sound villages and relocate to reservations. The treaty dissolved Indian title to their traditional and accustomed lands and by 1855-1856 the federal government used military force to contain Indian people dissatisfied with the poor quality of reservation lands. Individuals considered to belong to the Suquamish Tribe were relocated to the Port Madison Indian Reservation and the Muckleshoot Indian Tribes was relocated to the Muckleshoot Reservation. Some Duwamish people moved to these reservations; however, many remained on their ancestral lands. The Duwamish Tribe is not currently federally recognized but continues to seek federal recognition (Duwamish Tribe 2011).

The City of Seattle was incorporated in 1869. At this time the City's boundaries did not include the project location. The Magnolia area, containing Fort Lawton, was annexed in 1891 (Wickwire 2001:10). Land at Fort Lawton was transferred from the City of Seattle to the United States in 1898 for the creation of the new military post on Magnolia Bluff. The initial construction of Fort Lawton took place to the west of the USARC, in what is now the Fort Lawton Historic District (Groesbeck 2011:28).

Significant early twentieth century developments near Fort Lawton included construction of the Lake Washington Ship Canal and Ballard Locks, connecting Shilshole and Lake Washington via Lake Union. Construction began on the Lake Washington Ship Canal and Ballard Locks (later renamed the Hiram M. Chittenden Locks) in 1911 (CH2M Hill 2009). The Ballard Locks allowed ships to negotiate the difference in elevation between Puget Sound and the inland lakes. In 1916, workers breached a temporary dam at Portage Bay, allowing water to spill from Lake Washington into the Montlake Cut, and the Ship Canal was officially opened in 1917 (Miller and Blukis Onat 2004:Table 1). As a result, Lake Washington's outflow shifted from its former Black River-White River-Duwamish River-Elliott Bay route to the Montlake Cut and Lake Washington Ship Canal, entering Puget Sound at Shilshole Bay. The elevation of Lake Washington decreased from 29.8 feet to 21 feet MLLW (Chrzastowski 1983:3; Troost and Booth 2008:29).

Industrial development increased along nearby waterways following completion of the locks. The Magnolia neighborhood was home to dairy farms into the 1930s, and truck farms and subsistence plots as late as the 1940s. Residential development gradually replaced these land uses. Transportation connections to the area were improved with the construction of the Garfield Street Bridge (now known as the Magnolia Bridge) in 1930 and the Dravus Street Bridge in 1931. Lands south and east of Fort Lawton were platted by the 1930s. After the conclusion of World War II, local residential development focused on modest, affordable homes. While some upscale homes were built on Magnolia Bluff in the early twentieth century, this segment of the real estate market grew later, beginning in the 1960s (Fiset 2001).

Important local developments in the mid- to late twentieth century included construction of the West Point Treatment Plant and establishment of Discovery Park. In 1966, the West Point Treatment plant was completed and began operations. By 1970, the plant was treating sewage that otherwise would have flowed to Puget Sound, Elliott Bay, and the Duwamish River (Wilma 2000). In 1968, the Army decided to transfer much of the base site to the City of Seattle, which subsequently became Discovery Park, the City's largest park (534 acres). After the land was transferred to the City, a 20-acre portion of the site was turned over to Seattle's Indigenous community to create the Daybreak Star Cultural Center. Daybreak Star was completed in 1977. It serves as an events center and the headquarters of United Indians of All Tribes Foundation (Denfeld 2008; United Indians of All Tribes Foundation 2025).

Historical Land Use

Historical maps, land records, and aerial photographs were reviewed to characterize conditions within the project locations prior to construction of the extant facilities, beginning with the settlement period (BLM 2017; King County 2025; USCS 1867; USCGS 1899; USGS 1909,

1949; USSG 1855, 1856). Further historical details for the project location are available from prior studies and documents (e.g., Groesbeck 2011) as summarized below.

The General Land Office (GLO) surveyed the township containing the project in the 1850s. The GLO cadastral survey map shows homesteads on Salmon Bay and Shilshole Bay; no cultural features were mapped in or adjacent to the project (Figure 3). A stream, now known as Wolfe Creek, was present in a ravine east of Fort Lawton. It drained a marsh south-southeast of Fort Lawton and flowed to Salmon Bay. According to an online search of federal land records, a patent for land containing this location was issued to David N. Hyde in 1872 (Accession No. AGS-0366-191, Agricultural Scrip Patent, 160 total acres) (BLM 2025). Historical coast charts show the Fort Lawton location as in a forested area that slopes down to the north, east of the Army Post established in 1898 and north of the road that connected the post to a landing on Salmon Bay (Figures 4 and 5). The 1867 coast survey chart describes the uplands in the project vicinity as “covered with dense growth of pine trees” (USCS 1867). An 1899 coast survey chart also shows forests in the project location and surrounding area, and the topography within the project slopes down towards Salmon Bay to the northeast (USCGS 1899). These maps do not show any cultural features (e.g., trails or homesteads) in the project location.

A topographic map from 1909 shows terrain and natural features similar to those on the coast charts in the Fort Lawton location (Figure 6). A road extending northwest from 36th Avenue West and two structures had been built at Fort Lawton in the northwestern part of the property. Aerial imagery from 1936 shows a network of roads through the site and vegetation conditions ranging from dense tree cover in the northwest to fully cleared in the northeastern part, and thinned forest in the central and southern parts (Figure 7). The Fort Lawton Cemetery is clearly visible in the southwestern end of the project. A topographic map from 1949 shows most of the northern two thirds of Fort Lawton as occupied by structures (Figure 8).

Groesbeck (2011:28, 32) provides a history of development and military activity at Fort Lawton:

The approximately 33-acre area that now comprises Fort Lawton USARC was part of the land transferred from the City of Seattle to the United States in 1898 for the creation of the new military post on Magnolia Bluff. The initial construction of the newly created Fort Lawton took place to the west of the USARC, in what is now the Fort Lawton Historic District. The earliest constructed feature near the site related to the land’s military use was the rifle range. The range was built as early as 1906, just west of the AMSA and extending to the west toward Puget Sound (FMSM 2007:11). A July 1910 plan for improvements to Fort Lawton, created by John C. Olmsted, shows the rifle range, as well as the USARC site, identified as a possible site for vegetable gardens. The plan shows one building, a laundry, in the approximate location of Leisy Hall (USAR 88th RSC).

The Incinerator Building (Building 275), the first of the extant buildings on the site, was constructed in 1934 to destroy fallen horses. Photographs indicate that it was a two-story, wood frame building (FMSM 2007:11) (Plate 23).

The site remained, for the most part, undeveloped until World War II. Rows of barracks were constructed on the site during the war, covering the entire site (Plate 24). A large, Greek crossshaped building with a cross-shaped monitor roof was built at the center of the barracks, on the site of present-day Leisy Hall (see Plate 23). The barracks remained on the

site at least through 1950, though they had been removed from the site by the time Harvey Hall was completed in 1958. The large building, of which no records were found to indicate its use, appeared in a historical aerial photograph from 1968. The building was most likely demolished when Leisy Hall was constructed in 1972.

Harvey Hall USARC (Building 215) and OMS (Building 211) were completed in 1958 to consolidate Army Reserve activities at Fort Lawton. The four-unit (800-man) facility was built as part of a large-scale building campaign by the Army Reserve. As part of the Fiscal Year 1957 appropriations, a large number of new training centers were approved for construction throughout the country. In Washington State, centers were approved to be built in Everett, Mount Vernon, Renton, Seattle, Spokane, and Tacoma. Harvey Hall USARC was approved as a four-unit (800-man) training center, its estimated construction cost at \$492,000 (U.S. Senate Committee on Appropriations 1956:518). As originally constructed, Harvey Hall fell into the Sprawling Plan sub-type (Plate 25). ...

In 1962 an OMS (Building 250) was built on the site of the current OMS (Building 245) to be used as a motor repair shop. The one-story building had a flat roof and three garage bays on its north elevation. A 1972 aerial photograph shows the building and surrounding MEP, which appears to have been unpaved at that date (Plate 26). Eighty-eighth RSC Army facility records indicate that the fuel building west of present-day AMSA 79 was constructed circa 1972.

Leisy Hall USARC and AMSA 79 were constructed in 1972. The new, 1,000-man center followed post-1964 building trends for facilities. Rather than standard designs, such as those created by Reisner & Urbahn, later buildings were designed as individual commissions. Although facilities during this period addressed the same functional needs as the earlier buildings, they did so by using a variety of architectural styles, from a continuation of Reisner & Urbahn's Contemporary-style buildings to brick-and-glass cube structures that resembled commercial office buildings (Adams and Kierstead 1997:48). ...

The original 1972 building was T-shaped, including the north and west wings (see Plate 26). The main entrance to Leisy Hall was from the south elevation of the north wing. A flight of stairs led from the parking lot to the east to a paved pad in front of the entrance. The original building was expanded in 1976 with the addition of the east and south wings. The addition followed the style of the original building, the east wing mimicking the north and the south wing following the buildings adjoining it to the west (Plate 27). Prior to its tenancy by the 88th RSC at Leisy Hall, it was occupied by the 50th General Hospital Reserve Unit, a Dental Unit, and other units to support Fort Lawton (FMSM 2007:12).

In 1990 the flammable material storage building west of AMSA 79 was erected. Storage Building 214 was built in 1999, and the pump house north of Harvey Hall was built in connection with the FLARC building to the west of the site (built in 2000 as a USARC, transferred to the VA in 2009). Building 245, an OMS, was constructed in 1999 to replace the OMS built in 1962.

The Incinerator Building remained standing through 1997, but a 2003 aerial photograph of the site shows that it had been demolished by that date (U.S. Army 88th RSC var.). Only its concrete foundation remains alongside the Incinerator Stack.

Harvey Hall has undergone extensive renovations in the past decade. In 2003 the southwest addition was constructed as band practice rooms. Around the same time, the drill hall was renovated as an auditorium. As a result, the original roll-up vehicle door was removed and window glazing was replaced with metal panels. Early, undated changes to the building include the replacement of original windows and removal of the indoor firing range. The original entrance assembly has been replaced and the two-story entry enclosed to create additional second-story office space. Original accordion room partitions have been replaced with solid walls.

While much of Fort Lawton was transferred to the City of Seattle in the early 1970s and became Discovery Park, an area of approximately 46 acres was retained by the U.S. Army and used as a Reserve Center. In 2000, the Army built the FLARC building at the Reserve Center, which was transferred to the VA in 2011. The Federal Government plans to retain the portion of the Army Reserve Center site that contains FLARC, together with supporting parking and the military cemetery. The remaining approximately 34 acres of the Army Reserve Center included in this analysis is currently closed and vacant and is in caretaker status by the Army.

Previously Recorded Sites and Surveys

Numerous cultural resources investigations have been conducted within approximately one mile from each of the project locations. These have included surveys, test excavations, data recovery, and monitoring for a variety of private and public developments. Cultural resources investigations within the project have been limited to an archaeological and historic resources survey west of Leisy Hall (Thompson et al. 1995) and the historic inventory conducted at Fort Lawton USARC (Groesbeck 2011). Prior cultural resources investigations have identified archaeological and historic sites within a distance of one mile from each location.

Archaeological Resources

Eight archaeological sites have been recorded within one mile from the Fort Lawton property. One precontact archaeological site, for which minimal location information is available, has been recorded on the Magnolia Bluff uplands near Fort Lawton. This scatter of precontact lithic material was identified in 1950 as a campsite containing stone tools in the center of Magnolia overlooking a historic marsh (University of Washington 1950). In 1958, there was an attempt to revisit the site, but no artifacts or deposits were observed. It was noted that the artifacts had been collected and were in the possession of local residents. Other precontact archaeological sites in the area are near the Magnolia Bluff and Salmon Bay shorelines. Historic-era archaeological sites associated with Fort Lawton have been identified west of the project. These include a historic building foundation and a historic dump site used by the military. Archaeological sites have not been recorded within the project location.

Historic Built Environment Resources

Review of DAHP's Historic Property Inventory shows that 101 historic built environment resources have been identified within approximately 500 feet from the project. Of these, 72 have been entered in the database based only on information from King County Assessor records. These resources are predominantly early to middle twentieth century single-family residences. Twenty-nine historic built environment resources within 500 feet from the project have been recorded in more detail (Table 1). These include four USARC facilities recorded within the current project, which were determined not eligible for the National Register of Historic Places

(NRHP) in 2012, and one single-family home that was determined not eligible for the NRHP in 2023. Nineteen of the recorded resources have been recommended not eligible for the NRHP by the recorders. Three of the recorded resources have not been evaluated for historic register eligibility; two of these have been demolished since they were recorded in the late 1970s.

Two of the recorded historic built environment resources have been determined eligible for the NRHP. The Fort Lawton Cemetery, located partially within the southwestern part of the project, has been determined eligible for the NRHP based on its associations with the development of Fort Lawton and its uniqueness as the only “post” cemetery in King County (Sundberg 2010). The single-family home at 3500 W Commodore Way, built in 1954, has been determined eligible for the NRHP based on its design characteristics as an intact example of mid-century modern residential architecture (Yellin 2018).

Within one mile from the Fort Lawton site, eight historic properties have been listed on the NRHP, Washington Heritage Register (WHR), Seattle Landmarks Register (SLR), or as a National Historic Landmark (Table 2). However, none of these would be physically altered by the project, nor are they located in close enough proximity to the project for indirect impacts (e.g., change to viewshed) to occur. The project alternatives do not involve any part of the Fort Lawton Historic District, located .25 mile west of Fort Lawton USARC, and would not affect the historic district.

Potential for Previously Unrecorded Cultural Resources

The DAHP statewide predictive model uses environmental data about the locations of known archaeological sites to identify where previously unknown archaeological sites are more likely to be found. The model correlates locations of known archaeological to environmental data “to determine the probability that, under a particular set of environmental conditions, another location would be expected to contain an archaeological site” (Kauhi and Markert 2009:2-3). Environmental data categories included in the model are elevation, slope, aspect, distance to water, geology, soils, and landforms. According to the model, the project location is mostly ranked “Survey Highly Advised: High Risk” with small areas ranked “Survey Highly Advised: Very High Risk” and “Survey Advised: Moderate Risk” (DAHP 2017b). These probability estimates are generally supported by proximity to previously recorded archaeological sites.

An archaeological sensitivity model was recently developed as a part of an archaeological context statement for King County (Kopperl et al. 2016). This model conditions the archaeological sensitivity of particular area of the modern-day King County landscape on two axes, sensitivity and preservation, across five analytic time periods and overall in relation to recorded archaeological sites (Kopperl et al. 2016:173). This model identifies the Fort Lawton vicinity as having moderate sensitivity for Analytic Periods (AP) 1 (14,000–12,000 cal BP), 2 (12,000–8000 cal BP), and 3 (8000–5000 cal BP); low sensitivity for AP 4 (5000–2500 cal BP) and 5 (2500–200 cal BP); low sensitivity for archaeological sites overall; and that the Fort Lawton location is in a stable (neither erosional nor aggradational) landform setting (Kopperl et al. 2016:Figures 8-2 – 8-8).

Archaeological expectations in the project are informed by the above predictive models as well as historical and modern land use, precontact and ethnographic settlement patterns, and

geomorphology. The project location is considered to have a low potential to contain as-yet unknown archaeological sites due to the extent of prior ground disturbance in a non-depositional setting on a glacial landform. The types of precontact-era archaeological materials that may be present within the project area could include the remains of habitation sites, lithic scatters, or similar features representing a range of domestic, subsistence, and ceremonial activities. Historic period archaeological materials at the project would most likely be related to military activities.

Field Investigations

CRC archaeologist Margaret Berger and historic architect Jim McNett conducted site visits in September and October 2017 during preparation of the cultural resources technical report for the 2018 EIS. Additional field investigations were conducted by Margaret Berger on November 26, 2024; notes and photographs are on file at CRC. This field reconnaissance was conducted with the goal of observing current conditions at Fort Lawton USARC, documenting historic built environment resources within the project, and identifying potential impacts to cultural resources from project as currently proposed (Figures 9 – 16).

The purpose of the archaeological reconnaissance was to inspect any available surface sedimentary exposures for archaeological material and to determine whether any potentially undisturbed locations were present. The purpose of the historic built environment reconnaissance was to observe the buildings, landscaping, and neighborhood setting in their current condition, and evaluate historic buildings at the Fort Lawton location for potential Seattle Landmark nomination.

Results

Conditions observed at Fort Lawton in 2017 and in 2024 were largely consistent with those described by Groesbeck (2011:12):

The perimeters of the site are lined with trees, but its interior has sparse vegetation that includes a few trees and landscape features. The two densely vegetated areas are the strip of land between Texas Way West and the Military Cemetery and the northwest portion of the site that slopes downhill, north and west of Trail Blazer Field.

Harvey Hall is farthest to the south, facing 36th Avenue West. The building is partially screened from the street by a line of deciduous trees, and a metal fence separates the property from the street. West of Harvey Hall is a MEP asphalt parking area, the OMS building (Building 211), and Building 214. Just north of Harvey Hall is the pump house.

Leisy Hall is directly north of Harvey Hall, the two separated by a POV parking area. AMSA 79 is west of Leisy Hall, on the other side of Texas Way West. The AMSA, large MEP area, and Buildings 223 and 228 on the south and west edges of the area are all enclosed by a chain link fence. Additional POV parking areas are to the north, northeast, and east of Leisy Hall.

The OMS building (Building 245) is north of Leisy Hall. The OMS and its MEP parking area are separated from the Leisy Hall parking areas by a steeply sloped hill and a chain link fence that encloses the entire area.

The northwestern portion of the property consists of Trailblazer Field, an open grassy area with two sets of bleachers on its south end; the Incinerator Stack and concrete foundation of the incinerator house at the west end of the field; and overgrown areas of trees and undergrowth to the north and west of the field.

The bleachers have been removed from Trailblazer Field and the windows of vacant buildings have been covered with plywood, but conditions appeared otherwise unchanged. Open spaces throughout the property appear graded and terraced, as evidenced by road cuts and large, fairly flat lawns separated by steep slopes. Large areas were also graded to support the parking areas that dominate the eastern portion of the property. Moderate to steep slopes form the northern edge of the property, and a moderately sloped wooded buffer separates most of the USARC from the Fort Lawton Cemetery. A break in the vegetation provides a view corridor between the cemetery and the southwestern corner of the USARC along Texas Way. However, a portion of the project site also overlaps the Cemetery. The Cemetery is actively maintained and is in a condition similar to when it was recorded and determined eligible for the NRHP in 2012.

No aboveground evidence of archaeological sites was observed. The Fort Lawton property is considered to have a very low potential for intact archaeological sites due to the extent of prior construction and associated site preparation (e.g., grading) on a landform without natural deposition since the Pleistocene. These prior activities likely removed or otherwise obscured any archaeological sites that may have been present.

Existing buildings and structures within the project are shown in Figures 17 – 28 and Table 4. The Army Reserve Center facilities at Fort Lawton were determined not eligible for the NRHP in 2012. Because it has been more than ten years since this determination was made, the inventory forms were updated, the potential significance of the properties was reevaluated, and the potential for a historic district to be present was evaluated for this SEIS, consistent with current DAHP standards (DAHP 2023). DAHP Historic Property Inventory forms were completed on WISAARD and are included as an attachment to this report. Resources were evaluated for their significance based on criteria for listing on the NRHP, the Washington Heritage Register (WHR), and Seattle Landmarks list. Seattle Landmarks eligibility evaluations included in the 2018 EIS have been updated as a part of this analysis.

NRHP Eligibility Criteria

Evaluating the significance of a historic property requires consideration of its historic context. Determining whether a property is significant within its historic context requires identifying the following:

- The facet of prehistory or history of the local area, State, or the nation that the property represents;
- Whether that facet of prehistory or history is significant;
- Whether it is a type of property that has relevance and importance in illustrating the historic context;
- How the property illustrates that history; and finally
- Whether the property possesses the physical features necessary to convey the aspect of prehistory or history with which it is associated. (National Park Service 2002:7)

According to NRHP assessment criteria developed by the National Park Service (2002:2), historical significance is conveyed by properties:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. 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; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history

According to the NRHP guidelines, the “essential physical features” of a property must be intact for it to convey its significance, and the resource must retain its integrity, or “the ability of a property to convey its significance” (National Park Service 2002:44). The seven aspects of integrity are:

- o Location (the place where the historic property was constructed or the place where the historic event occurred)
- o Design (the combination of elements that create the form, plan, space, structure, and style of a property)
- o Setting (the physical environment of a historic property)
- o Materials (the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property)
- o Workmanship (the physical evidence of the crafts of a particular culture or people during any given period of history or prehistory)
- o Feeling (a property's expression of the aesthetic or historic sense of a particular period of time)
- o Association (the direct link between an important historic event or person and a historic property).

WHR Eligibility Criteria

Criteria used for assessment of potential eligibility for the WHR are similar to NRHP criteria. Criteria to qualify include:

- o A building, site, structure or object must be at least 50 years old. If newer, the resource should have documented exceptional significance.
- o The resource should have a high to medium level of integrity, i.e. it should retain important character defining features from its historic period of construction.
- o The resource should have documented historical significance at the local, state or federal level. [DAHP 2024:1]

Seattle Landmarks Eligibility Criteria

A potential Seattle Landmark may be defined as a building, object, or site which is at least 25 years old. Additional criteria used to assess potential eligibility for designation as a Seattle Landmark include:

- S1. The resource is the location, or is associated with, an historic event of significance to the community, city, state, or nation;

- S2. The resource is associated with the life of a person(s) of significance to the community, city, state, or nation;
- S3. The resource is associated with a significant aspect of the cultural, political, or economic heritage of the community, city, state, or nation;
- S4. The resource embodies distinctive visual characteristics of an architectural period, style, or method of construction;
- S5. The resource represents the outstanding work of designer or builder
- S6. The resource is an easily identifiable feature of a neighborhood or city due to its prominence of location or its contrast of siting, age, or scale within the neighborhood.

Additionally, the building must meet a high level of integrity as defined by the NRHP guidelines such that the resource still conveys the criteria used for designation (Seattle Neighborhoods 2024).

Fort Lawton USARC Historic District Evaluation

The subject properties were constructed as part of the United States Army Reserve activities at Fort Lawton and occupy the northeast corner of the original 704-acre fort (Boyle and Sokol Furesz 2007). Between 1898 and 1972, the fort was occupied by different United States Coastal Artillery, Army, Army Reserves, and Air Defense installations (Boyle and Sokol Furesz 2007; Denfeld 2008; Groesbeck 2011). It was also home to a battalion of the Civilian Conservation Corps (CCC) in the 1930s. Initial development was located on a west-facing slope in the southwest quarter of the fort and focused on construction of the parade grounds, officer and non-commissioned officer quarters, and support buildings, many of which are now preserved and recognized as the Fort Lawton Historic District within Seattle's Discovery Park. Prior to World War II (WWII) this area was generally open to the public and was accessible by road and rail. Initial development of the northern portion of the fort included clearance of the early 1900s 300-yard firing range and construction in 1934 of the Incinerator building and stacks. Increased use and operations during WWII caused the construction of dozens of cheap, temporary structures in these cleared areas, including the project location. Many of these were removed soon after WWII ended. The northeast corner, and the project location, was developed for use as the USARC training facility in the 1950s, reflecting increased funding and support for the Army Reserve. Following the Korean War, the Federal government increased construction of ARCs to address facility and equipment shortfalls made evident by the lack of preparedness witnessed during the war. Additional USARC facilities were constructed in the 1970s, as part of consolidation of resources when the rest of Fort Lawton was transferred to the City of Seattle. The building then fed into the "Total Force" policy, which again focused on improving administrative, training, and facility supports for the Army Reserve forces.

Over the years of operation, the fort never grew to a large station and the military considered divesting itself of the property on multiple occasions. The federal government attempted to sell the fort to the City of Seattle for \$1 in 1938. While the city hoped to use it as a park, the city could not afford to maintain the buildings and grounds and had to reject the proposal. In 1964, the Secretary of Defense again determined that most of the fort was in surplus of needs and could be sold off. After several proposals, in 1972, 391 acres of the fort were transferred to the City of Seattle for use as a park with a portion reserved by lease for use as a tribal cultural center. In 1976, another 151 acres, including the original Parade Grounds and early structures, were also

transferred. In an effort to protect the structures, the early Fort Lawton grounds were inventoried, evaluated, and nominated for listing on the NRHP and a Memorandum of Agreement between the federal government, State Historic Preservation Officer, and City of Seattle was created to provide guidelines on care and maintenance of the NRHP-listed properties within the Fort Lawton Historic District.

The Fort Lawton USARC is divided from the Fort Lawton Historic District by time and space and represents a discontinuous aspect of local military development. The Historic District is defined as historic buildings and structures constructed between 1898 and 1940 surrounding the Parade Grounds on a west facing slope. The USARC grounds are located on the back side of the ridge separating the USARC grounds from the Historic District and are not visible from the district. Additionally, the properties were generally constructed during or after 1958 and did not contribute to the early development of the fort.

The Fort Lawton USARC properties are similarly recommended not eligible for consideration as an historic district. The USARC is composed of three distinct construction complexes with different styles, purposes, and scale in architecture. The 1958 Harvey Hall ARC complex includes two-story, masonry-faced structures with low-gable roofs and moderate footprints using the simple but modern design provided by Reisner and Urbahn and implemented nationally. In contrast, the 1972 and 1976 Leisy Hall ARC is more grandiose, set on a raised platform and rising two stories tall with large pilaster-framed bays, deep overhanging roofs, and sprawling footprints. A 1999 Organizational Maintenance Shop (OMS) building at the north end replaced an earlier 1962 OMS building in the same location. The incinerator stack, constructed ca. 1934, was built prior to USARC development and is not associated with the growth or support of the USARC.

DAHP Property # 115861 – Harvey Hall USARC

This property consists of the 2-story administration and training facility known as Harvey Hall (Building 216), constructed ca. 1958, and its secondary structures. Harvey Hall has an irregular, L-shaped footprint formed through the main building, oriented lengthwise north to south along 36th Ave W; the auditorium wing oriented lengthwise east to west and connected by a one-story hyphen to the southwest corner of the main building; and the one-story south wing, located south of the main building and oriented lengthwise east to west. A 2003 one-and-one-half-story southwest addition is set west of the south wing and south of the Auditorium. It is connected to each by hyphens. There are three secondary buildings associated with the hall—Building 211, a 1958 former OMS building converted to storage located to the west of the southwest addition; Building 214, a ca. 2000 storage and maintenance shop at the northwest corner of the shared parking lot; and the ca. 2001 Pump House to the north of the main building. The buildings are similar in appearance to recorded descriptions and images published in 2011 and are summarized here with differences noted.

Harvey Hall (Building 216)

The ca. 1958 Harvey Hall sits at the northeast corner of the Hall complex and includes the main building, auditorium, hyphen and south wing (Figure 18). The building sits on poured slab foundations. It has low-pitch side-gable roofs with moderate overhangs finished in sloped soffits. The gable ends of Harvey Hall are hidden behind squared terminal facades. The roofs are

covered in rolled sealant. At the north face of the main building, a series of flat roofs supported by metal poles provides a covering for the stairway and entrance located there. The building is composed of concrete walls with stretcher-bond red brick masonry veneer. A four-story tall, large, rectangular, stretcher-bond red brick chimney rises externally from the west face of the main building, just north of the hyphen. The front entry, located south-of-center on the east face of the main building, is recessed and clad in a grid of metal sheets, similar in pattern and display to the then-glass glazing used in 1958 (Groesbeck 2011:Plate 25). A change in the brick pattern on the west face of the Auditorium wing—and a relict lintel—suggests that a large door was once present there and has since been bricked over.

The building is accessed on the main building by paired full-light doors at the main entrance and the northern side entrance and by paired steel doors with transom on the west face. The hyphen between the main building and auditorium is accessed on the north face by a glazed door located at the west end of the face, and partially obscured by the eastern terminal wall of the auditorium. The auditorium is accessed by two individual steel doors on the north face and through its connection to the main building and southwest addition through the hyphens. The south wing is accessible through hyphens to the main building and southwest additions; no external access is visible on the south wing. Windows are composed of short top-hinged or hopper windows and single-hung windows with concrete slip-sills. The auditorium was originally lit by gangs of four sashes set under the eaves. Several of these have been replaced and covered-over. For security, all remaining glazed doors and windows have been covered externally with oriented strand board (OSB). Steel doors are secured through a secondary bar latch.

Southwest Addition

The ca. 2003 Southwest Addition is located south of center of the complex and occupies a space south of the auditorium and west of the south wing (Figure 19). It sits on a poured concrete foundation. It is covered by a moderate-pitched side-gable roof with no overhang. The roof is covered in standing-seam metal sheets. The southwest addition and connecting hyphens are clad in a half-wall of stretcher-bond red brick veneer with a decorative brick veneer from peak to base on the central south face of the addition. The Trail Blazer team logo noted in 2011 has been removed from the south face. The rest of the building is clad in exposed fastener wide rib-and-valley metal sheets. It is accessed by a single and a pair of steel doors on the west face, a half-light door on the west face of the northern hyphen, a steel door at the south end of the east face, and a half-light steel door on the south face of the east hyphen. There are no windows on the building, through three vents are spaced along the upper half-story of the east face.

Building 211

The ca. 1958 Building 211 is located in the southwest corner of the complex (Figure 20). It sits on a poured concrete slab and has a low-pitch side-gable roof with moderate overhangs finished in sloped soffits. The roof is covered in rolled sealant. The building is composed of concrete walls with stretcher-bond red brick masonry veneer. The gable ends are clad in black metal. Variations in the east-facing cladding of Building 211 show the building used to have four vehicle bays, of which the entrances of the southern three have been bricked over. The building is accessed by a steel door on the west edges of the north and south faces and by a segmented, roll-up garage door on the north end of the east face. It is lit by transoms on the west face composed of gangs of five sashes with concrete slip-sills.

Building 214

The ca. 2000 Building 214 is located at the northwest corner of the complex (Figure 21). It sits on a poured concrete slab foundation. It is covered by a moderate-pitch side-gable roof with no overhangs. The roof is covered in standing-seam metal sheets. The building is clad entirely in exposed fastener wide rib-and-valley metal sheets. It is accessed by three standard steel doors located south-of-center on the east face and east-of-center and west-of-center on the south face, and by a segmented, roll-up garage door located centrally on the south face. Small, low-pitch front-gable roofs project from the face to provide covered entries over the stoops at the eastern two doors. There are no windows on the building, though two vents are located on the east end of the north face.

Pump House

The ca. 2001 Pump House sits just north of the north end of Harvey Hall (Figure 22). It sits on a poured concrete slab foundation. It is covered by a low-pitch hip-roof with moderate overhang terminating in a wide, plain fascia. The roof is covered in standing-seam metal sheets. The building is clad in stretcher-bond red brick masonry. It is accessed by a pair of steel doors on the north half of the west face.

Evaluation of Significance

An inventory and NRHP evaluation of Harvey Hall was completed in 2011 by Sarah Groesbeck. This inventory meets current NRHP evaluation guidelines. Review of historic contexts, local histories, and the resource's present-day condition by CRC has not found evidence to recommend a change to the NRHP eligibility status of the resource. The 2011 evaluation is shared here as follows:

Harvey Hall USARC (Building [216]) and OMS (Building 211) were completed in 1958 to consolidate Army Reserve activities at Fort Lawton. The four-unit (800 man) facility was built as part of a large-scale building campaign by the Army Reserve. As part of the Fiscal Year 1957 appropriations, a large number of new training centers were approved for construction throughout the country. In Washington State, centers were approved to be built in Everett, Mount Vernon, Renton, Seattle, Spokane, and Tacoma. Harvey Hall USARC was approved as a four-unit (800 man) training center, its estimated construction cost at \$492,000 (U.S. Senate Committee on Appropriations 1956: 518). As originally constructed, Harvey Hall fell into the Sprawling Plan sub-type.

The building was dedicated on October 31, 1958 in honor of Captain James R. Harvey, 90th Infantry Division of the United States Army. Harvey was killed in action in France on June 15, 1944 and was posthumously awarded the Distinguished Service Cross for "fearless courage many times displayed" (U.S. Army 1958). The new USARC was the home of the 10th U.S. Army Corps Reserve for supervision of training, administration, and support of the Army Reserves and the operation, training, inspection, administration, and support of all ROTC units in Idaho, Montana, Oregon, Utah, and Washington (U.S. Army 1958).

Harvey Hall USARC was built using standardized plans by the New York architecture firm Reisner & Urbahn. The firm was experienced in governmental construction and was known for their simple, modern buildings that minimized cost through the use of modern building techniques and materials (Moore et al. 2008: 63). "Reisner and Urbahn's standard plans stripped down the influences of the 1950s contemporary style and used only a few character-defining elements of post-World War II American contemporary architecture. These include the use of technologically advanced building

materials, the clear articulation of building tectonics, a steel-frame or reinforced concrete structure, an asymmetrical massing of spaces, an open floor plan, a flat roof, smooth and unadorned exterior wall surfaces, fenestration patterns used to demonstrate that the exterior wall is not load-bearing (such as horizontal ribbons of windows, corner windows, or large plate-glass windows), and cantilevered eaves or balconies” (Moore et al. 2008: 75).

The Sprawling Plan army reserve centers such as Harvey Hall USARC were characterized by an asymmetrical T- or L-shaped plan with a long rectangular classroom wing across the front and a double-height drill hall at the rear, connected by a one-story hyphen. This layout was designed to be “expansible” (Moore et. al. 2008:169), and resulted in the separation of spaces for administrative and training activities. Storage Building 214 was built in 1999 and the pump house north of Harvey Hall was built in connection with the FLARC building to the west of the site (built in 2000 as a USARC, transferred to the VA in 2009).

Harvey Hall has undergone extensive renovations in the past decade. In 2003 the southwest addition was constructed as band practice rooms. During the same year, the drill hall was renovated as an auditorium. As a result, the original roll-up vehicle door was removed and window glazing was replaced with metal panels. Earlier, undated changes to the building include the replacement of original windows and removal of the indoor firing range. The original entrance assembly has been replaced and the two story entry enclosed to create additional second story office space. Original accordion room partitions have been replaced with solid walls. Evaluation of Harvey Hall USARC is based on criteria set forth in the national historic context study of Army Reserve Centers, *Blueprints for the Citizen Soldier*. The center is associated with President Eisenhower’s New Look program and the National Defense Facilities Act of 1950 as evidence of U.S. military preparedness during the Cold War, and Harvey Hall USARC is an example of the Sprawling Plan subtype as documented in *Blueprint for the Citizen Soldier*, featuring low massing brick walls, minimal detailing, and standardized, expansible construction. The context states that “since Sprawling Plan Army Reserve Centers are part of a nationwide building program and are common throughout the United States, an extant example must retain ALL of [its] character defining features to be eligible for inclusion in the NRHP” (Moore et al. 2008: 173). Character-defining features of this plan type include the original L-shaped building footprint, the original roof form, original fenestration pattern, original metal and glass entry, original or compatible siding and windows, and original assembly/drill space.

According to the guidelines of the national context study, Harvey Hall USARC is recommended as not eligible for the National Register. Although the center is associated with the New Look program, the National Defense Facilities Act of 1950, and Cold War-era Army Reserve building, it lacks character-defining features necessary to convey its associated national significance under Criterion A, nor does it meet Criterion A for local community planning, education, social history, or military planning at a local or state level. Unlike the National Guard, the USAR responds as support forces only in times of international conflicts and does not have a local or state mission. Due to the USAR’s national mission, USARCs would not have military significance at the state or local level. The center is not known to be associated with an individual significant on the local, state, or national level (Criterion B). *Blueprint for the Citizen Soldier* states that, “naming an Army Reserve Center after a significant individual does not necessarily make the Army Resource center eligible for the NRHP under Criterion B” unless there is a demonstrated association between the center and the individual (Moore et al. 2008:142).

Although Harvey Hall remains in its original location and setting, its integrity of materials and design have been adversely affected by replacement windows, glass curtain entry wall, and vestibule. Replacement windows have followed the original fenestration pattern, but original three-light windows were replaced with incompatible two-light metal sash sliding windows. Major alterations to the building include the 2003 addition. The renovation of the drill hall into an auditorium has resulted in the loss of its original function, as well as character defining features such as windows and the original roll-up vehicle door on its west elevation. Therefore, Harvey Hall is

not eligible as an intact example of the Sprawling Plan building type designed by Reisner & Urbahn (Criterion C). The OMS (Building 211) is considered a support structure for the main facility and was built according to a standard plan. Because this building served a secondary function and is associated with Harvey Hall, it is not individually eligible under any criterion because it is not a significant building type within the historic context of the U.S. Army Reserve. Building [214] and the pump house were constructed post-1961 and do not meet NRHP Consideration G, which governs the eligibility of resources less than 50 years of age, since they do not possess exceptional significance in regard to design, appearance, or historical associations. National Register eligibility under Criterion D was not investigated as part of this study. [Goesbeck 2011:Appendix A, 2-3]

Harvey Hall USARC has been significantly altered through changes to the fenestration and construction of the Southwest Addition and connecting hyphens. This has changed the integrity of design, feeling, materials, and workmanship. The building was constructed by the Federal Government for use as a USARC. While it continued in these operations, changes to the drill hall—now auditorium—and the overall layout have diminished the integrity of association. The resource maintains integrity of setting and location in a USARC development. It may also be noted that Buildings 214, OMS 245 (below) and the Southwest Addition were constructed within 4 years of each other and use a similar overall pattern of design features (e.g., moderate-pitched roofs with no overhang, brick-accented facades with panel siding).

The buildings were constructed as part of national military endeavors and do not reflect a local or state level trend or event, nor are they associated with the life of a person of significance to history (Criteria S1, S2, and S3). The changes to the building and complex have diminished the association with the New Look program or the Reisner & Urbahn Sprawling Plan design and the building is no longer representative of a particular style or work of a master craftsman (Criteria S4 and S5). The complex presents a dominant façade to the east, along 36th Ave W, which is partially to significantly blocked by evergreen vegetation and fencing. However, as noted, changes to the complex are still visible from this vantage and the resource no longer provides a landmark of historic integrity (Criterion S6). For these same reasons, the building does not have documented historic significance as required by the WHR.

Harvey Hall USARC and the associated secondary buildings do not meet the necessary criteria or levels of integrity and are recommended not eligible for listing on the NRHP, WHR, or Seattle Landmarks register.

DAHP Property #115862 – Leisy Hall USARC

This property consists of a two-story courtyard-complex constructed ca. 1972 as an administration and training facility known as Leisy Hall USARC (Building 220) and its secondary structures. Leisy Hall sits centrally on the Fort Lawton USARC grounds, facing north. It is composed of the T-shaped, two-story main building, oriented lengthwise east to west, a one-story wing at the southwest interior corner of the T of the main building; a one-story hyphen connecting to the south wing and south wing addition composed of a dense grouping of multi-height sub-wings; and the east wing, a rectangular, two-story building oriented lengthwise north to south. The east wing is connected by retaining wall, giving the complex a courtyard aesthetic. The east wing and south wing addition were constructed ca. 1976 using the same design elements as the ca. 1972 facility. The original facility and south wing additions sit on a graded platform level with Texas Way but raised above the landscape to the north and east. This change in elevation is emphasized on the north face of the main building which is set on a raised

platform supported by a rip-rap retaining wall along the slope. The east end of the building has an exposed walk-out basement and is supported by a concrete retaining wall. The east wing is set on a graded landscape just below the basement level and platform of the main building and partially built into the graded platform of the complex such that only the second floor of the south face is exposed. Secondary buildings include the ca. 1972 Area Maintenance Support Area (AMSA) 79 and two small outbuildings (Buildings 223 and 228) located on the west side of Texas Way.

Leisy Hall USARC (Building 220)

The main building and the east wing share the same overall features (Figure 23). They sit on a poured concrete slab foundation. The roofs are flat with deep overhangs partially supported by the bracketed, winged pilasters. The concrete pilasters start on narrow footings, flaring upward in a concave triangle that projects forward as a bracket and sideways to create an arched bay at the cornice. Molded concrete forms the cornices, which arch into a boxed finish for the roof overhang. The building is clad in aggregate concrete facings.

The main building front entrance is located centrally on the north face, in a deep recess and accessed by a pair of full-light doors set in a wall of glazing. A pair of full-light doors also provided access to the basement through the north face. Three steel doors are located on the west face, two on the first floor and one located centrally to the second floor. The east wing has a similar central recess—here leading to an open breezeway with new security fencing. A small recess to the south leads to a side door. A steel door provides egress on the north face. The windows of the buildings also share the same 4-sash ganged windows that extend from pilaster to pilaster on the external and internal faces—being the north and south of the main building and east and west of the east wing. All glazing is now backed with OSB for security.

The remaining wings to the south of the main building have two styles based on height (Figure 24). One-story tall buildings have flat roofs with short parapets and are clad in aggregate concrete panels. These are accessed by singular and paired steel doors. No windows are visible. The one-and one-half-story buildings are made of poured concrete panels with rectangular buttresses near each panel edge. No external access is visible. Tall and narrow rectangular glazing is present on some panels at the one-story level. Second-story transoms are present where the building façade rises above an adjacent one-story section.

AMSA 79 (Building 222)

AMSA 79 was built in a style matching that of the main building and east wing (Figure 25). It is oriented lengthwise north to south and faces west, away from Texas Way and sits on a poured concrete slab foundation. The building is predominantly composed of the one-and-one-half-story machine bay with one-story surrounding the north and east faces. The flat roof terminates in a deep overhang with boxed cornices. The building is also clad in aggregate concrete panels with flared pilasters. However, the pilasters, brackets, and arches are flat as opposed to the graceful arches and curved and molded cornices. The building is accessed by 5 large roll-up garage doors on the west face of the one-and-one-half story section and by a half-light door on the west face of the north wing and the south face of the main section. Windows include a single sash adjacent to the door on the north wing and horizontal-sliding window setting on the north face of the north

wing, and a gang of six sashes under the upper-floor cornices. The central two of each gang are likely hopper or casement apertures.

Buildings 223 and 228

Two secondary buildings (Buildings 223 and 228) sit to the west of the building on the same asphalt parking lot (Figure 26). Both are constructed of concrete block masonry on poured concrete foundations. Building 223 has a low-pitch front-gable roof and is accessed by a steel door while Building 228 is covered by a shed roof with an open front access.

Evaluation of Significance

Leisy Hall USARC was designed by the United States Army Corps of Engineers (1970) and constructed in 1971 to 1972 by The Prime Construction Company of Seattle (Gilje 1970). The building replaced a grouping of barracks and a large Greek-cross building that stood there through 1968 (Groesbeck 2011). As noted by Groesbeck (2011:Appendix A, 13) in the earlier inventory,

Leisy Hall USARC and AMSA 79 were constructed in 1972. The new, 1,000-man center followed post-1964 building trends for facilities. Rather than standard designs, such as those created by Reisner & Urbahn, later buildings were designed as individual commissions. Although facilities during this period addressed the same functional needs as the earlier buildings such as Harvey Hall, they did so by using a variety of architectural styles, from a continuation of Reisner & Urbahn's Contemporary style buildings to brick-and-glass cube structures that resembled commercial office buildings (Adams and Kierstead 1997:48)...

Leisy Hall was named in honor of Robert Ronald Leisy, Second Lieutenant, U.S. Army, Infantry, Company B, 1st Battalion, 8th Cavalry, 1st Cavalry Division, who was posthumously awarded the Medal of Honor for service during the Vietnam War. While serving as a platoon leader, 2nd Lt. Leisy shielded the radio operator accompanying him and absorbed the full impact of an enemy rocket-propelled grenade, saving the radio operator's life and protecting other men of his platoon who were nearby from serious injury. Second Lt. Leisy died as a result of those injuries on December 2, 1969 (Center of Military History 2011)....

Prior to its tenancy by the 88th RSC at Leisy Hall it was occupied by the 50th General Hospital Reserve Unit, a Dental Unit, and other units to support Fort Lawton (FMSM 2007: 12).

In 2011, the Leisy Hall USARC was not yet 50 years old and was determined not eligible under Exception G of the NRHP. The buildings are now over 50 years old and qualify for evaluation for listing on the NRHP and WHR, as well as the Seattle Landmarks register.

Leisy Hall has been altered over the years through expansion of the footprint, addition of windows, and changes to the main entry. In 1970, the main building was designed to have a one-floor, open court entry on the first floor that was three pilastered bays wide (United States Army Corps of Engineers 1970) A set of glass doors with glazed surround was meant to provide entry to north and south faces of the enclosed stairway to the second floor. By 2011, the court entry was enclosed by aggregate concrete wall panels that matched the surrounding building. Similarly, the original plans placed a series of storage rooms on the west half of the first floor, without external access or glazing. By 2011, single and paired windows were placed within several of these wall panels. The east wing and south wing additions were constructed in 1976—shortly after the initial phase of construction in 1972—and built in keeping with the overall

design and use of landscape. Because of the similarity in age and design, these are recommended as not a significant alteration to the property. However, the changes to the entry and northern fenestration have somewhat diminished the integrity of the original design, feeling, materials, and workmanship. While Operational Maintenance Shop 245 was constructed to the north in 1999, the building replaced a previous shop. Therefore Leisy Hall USARC maintains integrity of setting. The building has not been moved and retains integrity of location.

Background research indicates the building was constructed during a time when the military was divesting itself of the adjacent Fort Lawton property and at the start of a period of increased support for the US Army Reserves; however, plans to construct the hall had been in the works prior to the “Total Force” initiative of the 1970s and the building is not associated with the trend (Criteria A, S1, and S3). The building was designed by the US Army Corps of Engineers and operated as a facility of the USARC; it is not associated with the life of a person of significance to history (Criteria B, S2, and S5). The building strongly exhibits typical features of a New Formalist style facility, such as a location on a raised platform, concrete walls with arching pilasters that highlight the structural grid of the building, and a large slab roof (Houser 2016). However, it also exhibits departures from New Formalism that detract from its potential to be considered exemplary of the style. These include the sprawling, asymmetrical building complex, the lack of expansive, open interiors and/or patios, and the use of aggregate concrete wall panels instead of the smoother, rich-appearing materials typical of the style, such as travertine, marble, granite, or man-made materials that mimic their luxurious qualities (Buffalo Architecture and History 2024; Hampton et al. 2012; DAHP 2024). Similarly, the removal of the wide, open entry court and the addition of incongruous windows on the northern, main façade, have diminished the integrity of design and suggest an alteration to the floorplan. As such, the building is no longer an intact example of the New Formalism style (Criteria C and S4). The building is not associated with an archaeological site, nor is it likely to yield as-of-yet unknown information important to history (Criteria D and S6). For these reasons, the building also does not have a documented historical significance as required for listing on the WHR.

The building does not meet the necessary criteria or levels of integrity and is recommended not eligible for listing on the NRHP, WHR, or Seattle Landmarks register.

DAHP Property # 115864 – Operational Maintenance Shop 245

The resource is a one-story Operational Maintenance Shop constructed ca. 1999 at the north end of the Fort Lawton ARC (Figure 27). The building sits at the center of the south end of a paved 3.14-acre northeast portion of the ARC, facing west. The building is composed of a 38-foot wide (north to south) by 80-foot long (east to west) office with an attached 62-foot wide by 80-foot long 3-bay machine shop at the north end.

The building sits on a poured concrete slab. It is covered by a one-story moderate-pitched side-gable roof over the office and a two-story moderate-pitched side-gable roof over the shop. The roofs terminate with no overhang and are covered in standing seam metal sheets. Furnace chimneys and vents rise from the west and east pitches of the office roof. Three cupolas vent from the ridge of the machine shop and are evenly spaced along the length of the ridge. Another vent located half-way down the center of each pitch. The building is clad in red, stretcher-bond

brick on the first floor level and vertical vinyl siding from the level of the office cornice band to the top of the gable ends.

The building is accessed on the west face by a steel door located at the transition from the office to the machine shop. Large segmented, roll-up garage doors provide access to the machine shop with three located on the east and west faces. The office space is lit by three floor-to-ceiling windows located on the north half of the west face and two narrow floor-to-ceiling windows located on the west end of the south face. These are composed four horizontally oriented sashes.

Evaluation of Significance

The property was built ca. 1999 and is 25 years old. As noted by Groesbeck in 2011, the building is less than 50 years old and the basic design and function do not rise to the level of significance required for listing on the NRHP under Exception G or on the WHR. The building meets the age requirements for listing on the Seattle Landmarks register.

The building appears unchanged from 2011 and likely maintains integrity of design, feeling, materials, and workmanship. No other construction or changes have been made to the vicinity and the building maintains integrity of location and setting. The building is associated with Army Reserve activities.

The building was constructed to replace a previous OMS and operated as part of on-going training and maintenance activities at Fort Lawton ARCs. Therefore, the building does not represent an association with events, trends, or the life of a person, of significance to history (Criteria S1, S2, and S3). The building uses minimalistic design features with linear, horizontal aspects, large massing, and minimal roofing overhang and terminations. It does not represent a particular style or work of a master craftsman (Criteria S4 and S5). The building varies from the older, adjacent buildings, but is hidden by the dominant hill to the south and does not represent a significance or scenic landmark (Criterion S6).

The building does not meet the necessary criteria and is recommended not eligible for listing on the Seattle Landmark register. The building is less than 50 years old and does not represent a qualifying association or construction of significance (Exception G). It is recommended not eligible for listing on the WHR or NRHP.

DAHP Property # 115865 – Incinerator Stack

The resource is an incinerator stack constructed ca. 1934 on the Fort Lawton Grounds, now part of the 33-acre Fort Lawton ARC grounds (Figure 28). It is located at the northeast corner of the original fort, and in the northwest corner of the ARC grounds. The stack sits at the toe of a moderate, west-facing slope that levels out somewhat west of the stack. The area is completely covered by a dense thicket of Himalayan blackberries.

The stack is composed of red brick in a header-bond pattern. The stack forms a mildly conical shape with an inverted, conical crown. A metal plate with a painted mural has been mounted to the southeast face, in the upper quarter of the stack body. Lightning grounding rods are mounted to the exterior of the stack.

Evaluation of Significance

The property has been previously inventoried and evaluated for listing on the NRHP twice (pre-1995 and 2011) and was recommended not eligible. Review of historic contexts, local histories, and the resource's present-day condition by CRC has not found evidence to recommend a change to the NRHP eligibility status of the resource. The 2011 evaluation is shared here as follows:

The Incinerator Building (Building 275), the earliest of the extant buildings on the site, was constructed in 1934 (FMSM 2007: 11). Photographs indicate that it was a two-story wood frame building with a gable roof and the brick tile stack located to the southwest. The Incinerator Building remained standing through 1997, but a 2003 aerial photograph of the site shows that it had been demolished by that date (U.S. Army 88th RSC var.). Only its concrete foundation remains.

The Incinerator Stack (Building 275), was determined not eligible for the NRHP through previous consultation with the DAHP previous to 1995 (EDAW, Inc. and KJS Associates, Inc. 1997:3-35). The building was constructed before the site's association with its present USARC function, but all vestiges of its former use have been removed. Without the original incinerator building, the stack lacks integrity of design, materials, workmanship, and association to convey its original function as an incinerator or its association with the military function of the site during the 1930s (Criteria A and C). The center is not known to be associated with an individual significant on the local, state, or national level (Criterion B). National Register eligibility under Criterion D was not investigated as part of this study. [Groesbeck 2011:Appendix A, 23-24]

In its current condition, the foundations, if still present, are completely obscured. The loss of the adjacent building has diminished the integrity of design, feeling, materials, and workmanship. In addition, the loss of the building has diminished the association of purpose and ownership, and the distance of the facility from the Fort Lawton Historic District creates a discontinuity with the fort grounds and history. Significant changes to the vicinity, including clearance of the fields and construction of the roads and Fort Lawton ARCs have diminished integrity of setting. The stacks maintain integrity of location.

This loss of integrity has similarly diminished any documentable association with an event, trend, or life of a person, of significance to national or local history (Criteria S1, S2, S3, S4). The stack is apparently sound and clearly of earlier design—based on the use of red brick instead of concrete—and offers a prominent departure from the surrounding landscape and architectural style, however, it lacks the relationship to the original building or grounds to convey significance of design or purpose (Criteria S5, and S6). For these reasons, the stack also does not have documentable historical significance as required for listing on the WHR.

The stack does not meet the necessary criteria or levels of integrity and is recommended not eligible for listing on the NRHP, WHR, or Seattle Landmarks register.

Significant Impacts

Because archaeological sites have not been identified within the project, no significant impacts to archaeological sites are anticipated. However, significant impacts to archaeological sites could occur if the project disturbs as-yet unknown archaeological sites.

Significant impacts to historic sites could be generated by demolition, removal, or other physical alterations to historic structures or cultural landscapes. This project, as currently proposed, would entail significant impacts to historic sites for each of the alternatives as discussed below.

Proposed Action

Historic Resources

Under the Proposed Action, all of the buildings and structures at Fort Lawton USARC except OMS Building 245 would be removed. However, none of these buildings appears to meet eligibility criteria for listing on local, state, or federal historic registers either individually or as a historic district. Removal of these buildings would therefore not cause a significant impact to historic resources.

The project site includes a portion of Fort Lawton Cemetery. Development in proximity to the cemetery is anticipated to be limited to passive park uses, unlit sports fields, and road improvements along Texas Way, which would cause minimal noise and visual impacts to the cemetery. Ground disturbance within the cemetery or any physical alteration of the cemetery would cause a significant impact.

Archaeological Resources

This alternative is considered to have a low potential to impact as-yet unknown archaeological sites due to the extent of prior ground disturbance in a non-depositional setting on a glacial landform. Non-developed areas of the property are forested and sloped and would not have been suitable for occupation or other activities with potential to generate significant archaeological deposits.

No Action Alternative

Historic Resources

If the current project is not pursued, buildings at Fort Lawton would likely continue to deteriorate. The Army may choose to retain the property in caretaker status, or it could sell it to another party. Future development of the property by others would have the potential to impact the setting of the Fort Lawton Cemetery and would likely involve removing the existing USARC buildings.

Archaeological Resources

Assuming a similar scale of ground disturbance, potential impacts to as-yet unknown archaeological sites would be similar to under the Proposed Action.

Mitigation Measures

In order to minimize risk of impacting archaeological and historic sites, the following specific measures are recommended for this project:

Historic Resources

At Fort Lawton, proposed development under the Proposed Action involves impacts to historic-aged buildings and structures. It is recommended that the structures to be removed be referred to the LPB for consideration, following the process described above (see “Regulatory Framework”). Recommendations regarding Landmark nomination eligibility of the buildings and structures on the property are summarized in Table 4. None of the buildings is recommended

eligible for listing as a Seattle Landmark, on the WHR, or on the NRHP. Therefore, no mitigation is anticipated to be required for the removal of these buildings. The City should seek concurrence with the recommendations from the appropriate agencies as noted in Table 4.

Mitigation of potential impacts to Fort Lawton Cemetery is recommended to include retaining an undeveloped buffer around the cemetery to avoid affecting its integrity of setting through the introduction of new built environment elements. It is also recommended that project design avoid any physical alterations to the cemetery and disturbance within the cemetery and surrounding buffer in order to avoid significant impacts.

Archaeological Resources

Should any as-yet unknown potentially significant archaeological sites be encountered by the project and it is not possible to avoid them, significant impacts would be generated. Impacts could potentially be minimized through development and implementation of mitigation measures appropriate to the nature and extent of discovered sites. In the State of Washington any alteration to an archaeological site requires a permit from DAHP (RCW 27.53.060). Mitigation measures may include one or more of the following:

- Limiting the magnitude of the proposed work;
- Modifying proposed development through redesign or reorientation to minimize or avoid further impacts to resources; or
- Archaeological monitoring, testing, or data recovery excavations.

Measures that may be required by the City to mitigate adverse impacts to an archaeological site include, but are not limited to:

- Relocation of the project on the site;
- Providing markers, plaques, or recognition of discovery;
- Imposing a delay of as much as 90 days (or more than 90 days for extraordinary circumstances) to allow archaeological artifacts and information to be analyzed; or
- Excavation and recovery of artifacts (DON 2015).

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts to historic sites are anticipated to be generated by the proposal. By implementing the mitigation measures recommended above, it should be possible to prevent any significant unavoidable impacts to historic sites.

Should any potentially significant archaeological sites be discovered and it is not possible to avoid them, impacts would be generated. However, it is expected that these impacts could potentially be minimized through development and implementation of additional mitigation measures appropriate to the nature and extent of discovered sites. In the event that ground disturbing or other activities do result in the inadvertent discovery of archaeological deposits, work should be halted in the immediate area and contact made with DAHP. Work should be halted until such time as further investigation and appropriate consultation is concluded. In the unlikely event of the inadvertent discovery of human remains, work should be immediately halted in the area, the discovery covered and secured against further disturbance, and contact effected with law enforcement personnel, consistent with the provisions set forth in RCW 27.44.055 and RCW 68.60.055. Attachment B outlines protocols for inadvertent discoveries in detail.

Limitations of this Assessment

No cultural resources study can wholly eliminate uncertainty regarding the potential for prehistoric sites, historic properties or Traditional Cultural Properties (TCPs) to be associated with a project. The information presented in this report is based on professional opinions derived from our analysis and interpretation of available documents, records, literature, and information identified in this report, and on our field investigation and observations as described herein. Conclusions and recommendations presented apply to project conditions existing at the time of our study and those reasonably foreseeable. The data, conclusions, and interpretations in this report should not be construed as a warranty of subsurface conditions described in this report. They cannot necessarily apply to site changes of which CRC is not aware and has not had the opportunity to evaluate.

It should be recognized that this assessment was not intended to be a definitive investigation of potential cultural resources concerns within the project area. Within the limitations of scope, schedule and budget, our analyses, conclusions and recommendations were prepared in accordance with generally accepted cultural resources management principles and practice in this area at the time the report was prepared. We make no other warranty, either express or implied. These conditions and recommendations were based on our understanding of the project as described in this report and the site conditions as observed at the time of our site visit.

This report was prepared by CRC for the sole use of EA. Our conclusions and recommendations are intended exclusively for the purpose outlined herein and the project indicated. The scope of services performed in execution of this investigation may not be appropriate to satisfy the needs of other users, and any use or re-use of this document, including findings, conclusions, and/or recommendations, is at the sole risk of said user. If there is a substantial lapse of time between the submission of this report and the start of construction, or if conditions have changed due to project (re)design, or appear to be different from those described in this report, CRC should be notified so that we can review our report to determine the applicability of the conclusions and recommendations considering the changed conditions.

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Figures and Tables



Figure 1. Project site shown on the Shilshole Bay, WA USGS 7.5-Minute topographic quadrangle.



Figure 2. Aerial imagery marked with the project site (base map: Google, Inc. 2024).

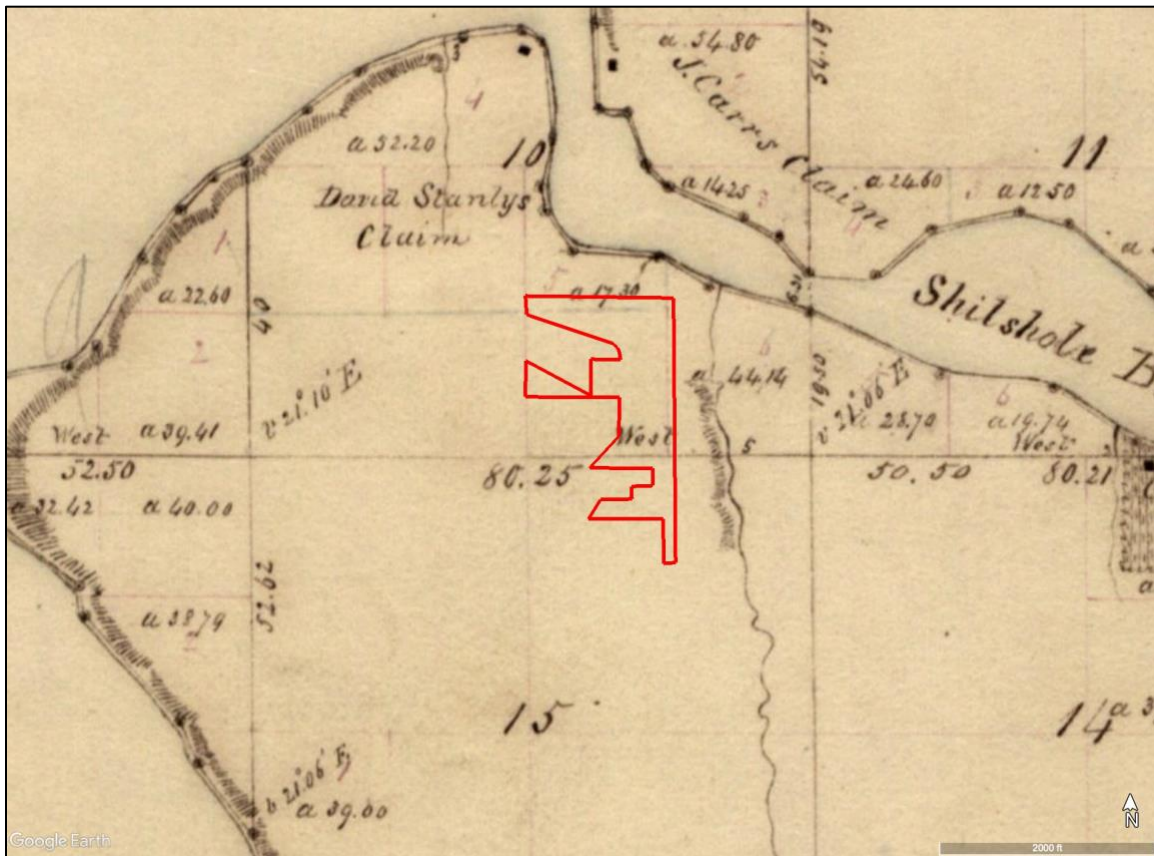


Figure 3. Fort Lawton site marked on GLO map (USSG 1855).



Figure 4. Fort Lawton site marked on historical map (USCS 1867) prior to establishment of the Fort Lawton military post to the west.

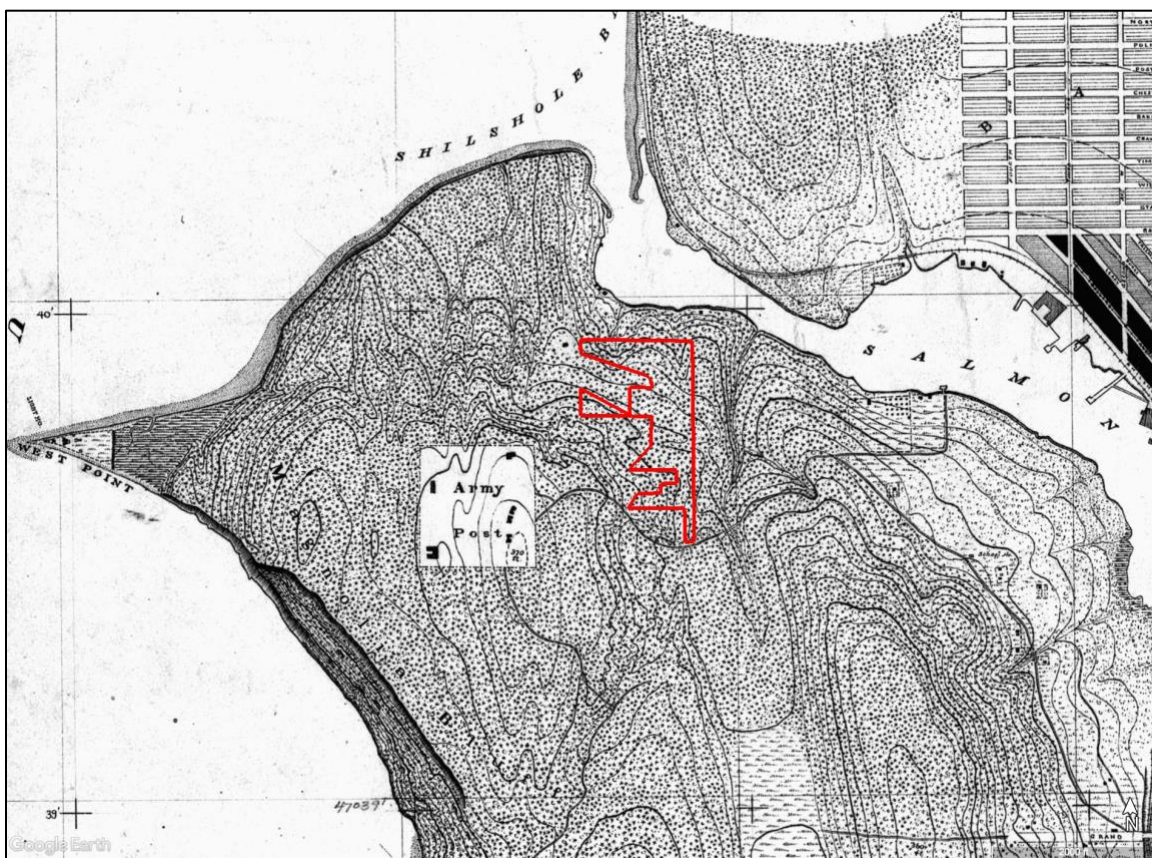


Figure 5. Fort Lawton site marked on historical map (USCGS 1899) post-dating establishment of the Fort Lawton military post.

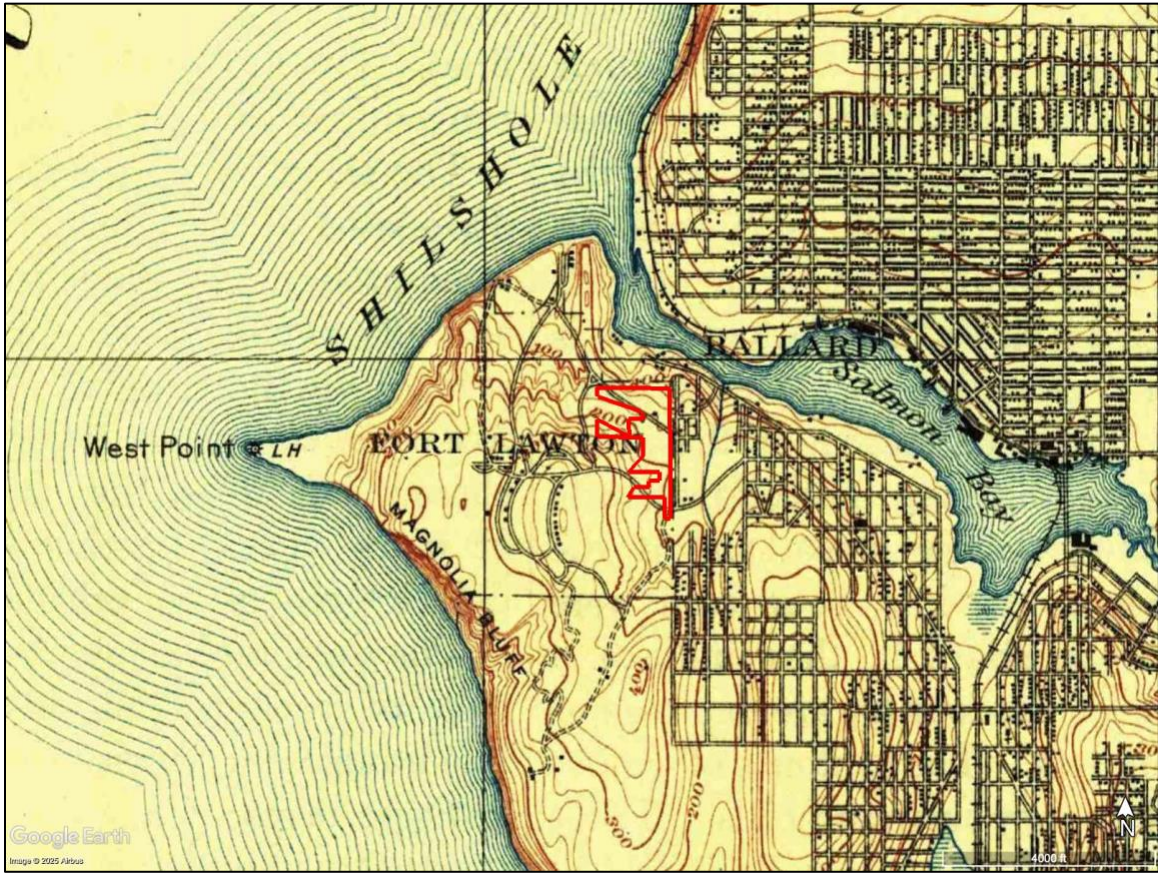


Figure 6. Fort Lawton site marked on historical topographic map (USGS 1909).



Figure 7. Fort Lawton site annotated on 1936 aerial imagery (King County 2025).

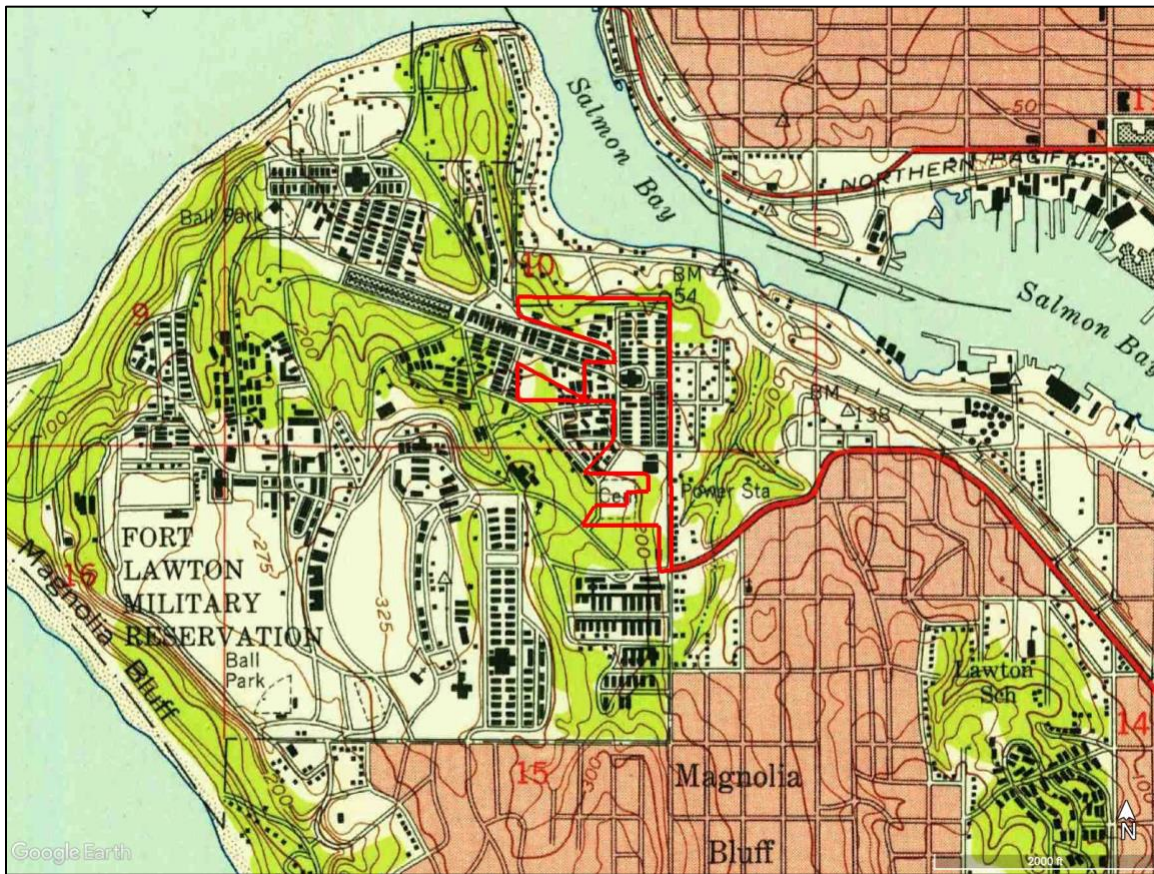


Figure 8. Fort Lawton site marked on historical topographic map (USGS 1949).

Table 1. Historic built environment resources previously inventoried within approximately 500 feet from Fort Lawton USARC (DAHP 2025).

Name	Address	Built Date	Historic Function	Historic Register Status	Potential Impacts
Fort Lawton Cemetery	3701 W Government Way, Seattle	Established 1898	Funerary – Cemetery	Determined eligible for NRHP.	Proposed park uses and road widening near the cemetery would minimally affect aspects of integrity (e.g., setting, feeling). It is recommended that the cemetery and a surrounding buffer be left undisturbed to avoid significant impact.
Fort Lawton USARC – Incinerator Stack	4570 Texas Way W, Seattle	1934	Defense – Military Facility	Determined not eligible for NRHP.	This structure would be removed under the proposed action. However, it is not eligible for NRHP, WHR, or Seattle Landmark nomination.
Fort Lawton USARC – Organizational Maintenance Shop	4570 Texas Way W, Seattle	1999	Defense – Military Facility	Determined not eligible for NRHP.	Changes to viewshed and setting. However, it is not eligible for NRHP, WHR, or Seattle Landmark nomination.

Name	Address	Built Date	Historic Function	Historic Register Status	Potential Impacts
Fort Lawton USARC – Leisy Hall & AMSA 79	4570 Texas Way W, Seattle	1972, 1976	Defense – Military Facility	Determined not eligible for NRHP.	These structures would be removed under the proposed action. However, they are not eligible for NRHP, WHR, or Seattle Landmark nomination.
Fort Lawton USARC – Harvey Hall	4570 Texas Way W, Seattle	1958, 2003	Defense – Military Facility	Determined not eligible for NRHP.	These structures would be removed under the proposed action. However, they are not eligible for NRHP, WHR, or Seattle Landmark nomination.
Residence	3626 W Commodore Way, Seattle, WA	1952	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	3500 W Commodore Way	1954	Domestic – Single-Family House	Determined eligible for NRHP.	None.
Residence	3632 W Commodore Way	1944	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	3760 W Commodore Way	1940	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	3718 W Commodore Way	1960	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	3614 W Lawton St	1965	Domestic – Single-Family House	Recommended not eligible for NRHP.	Indirect impacts (e.g., to viewshed and setting).
Residence	3724 W Commodore Way	1962	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	3737 W Commodore Way	1978	Domestic – Single-Family House	Unevaluated.	None.
Lockview Rest Home	4646 36th Ave W	c. 1930	Health Care	Unevaluated.	None; building no longer extant.
The Serviceman's Store, Anthony's Cleaning	3515 W Government Way	c. 1910-1925	Commerce/Trade – Business	Unevaluated.	None; building no longer extant.
Residence	3640 W Commodore Way	1927	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	3611 W Commodore Way	1953	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	3700 W Commodore Way	1961	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	3610 W Commodore Way	1968	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.

Name	Address	Built Date	Historic Function	Historic Register Status	Potential Impacts
Residence	3708 W Commodore Way	1952	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	3626 W Lawton St	1957	Domestic – Single-Family House	Recommended not eligible for NRHP.	Indirect impacts (e.g., to viewshed and setting).
Residence	3603 W Commodore Way	1953	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	3607 W Commodore Way	1953	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	3510 W Commodore Way	1973	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	3514 W Commodore Way	1968	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	3606 W Commodore Way	1970	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	4663 36th Ave W	1900	Domestic – Single-Family House	Recommended not eligible for NRHP.	Indirect impacts (e.g., to viewshed and setting).
Residence	3629 W Commodore Way	1973	Domestic – Single-Family House	Recommended not eligible for NRHP.	None.
Residence	4502 35th Ave W	1957	Domestic – Single-Family House	Determined not eligible for NRHP.	None.

Table 2. Register-listed historic properties within one mile from the project (DAHP 2025; Seattle Department of Neighborhoods 2025).

Historic Name (Common Name)	Address	Built Date	Historic Function	Historic Register Status	Potential Impacts
Fort Lawton Historic District	Fort Lawton, Seattle	1899 – 1945	Defense – Military Facility	Listed on NRHP, WHR, and SLR.	None.
Salmon Bay Great Northern Railroad Bridge	Spans Salmon Bay, Seattle	1913	Transportation – Rail Related	Listed on WHR and SLR.	None.
Fort Lawton Chapel	631 Washington Ave W	1942	Religion – Religious Facility	Listed on SLR.	None.
Chittenden Locks and Lake Washington Ship Canal	Salmon Bay, Seattle	1906 – 1917	Transportation – Water Related	Listed on NRHP and WHR.	None.
Magnolia Public Library	2801 34th Ave W, Seattle	1964	Education – Library	Listed on NRHP and WHR.	None.
Seattle Carnegie Library – Ballard Branch	2026 NW Market St, Seattle	1904	Education – Library	Listed on NRHP, WHR, and SLR.	None.

Historic Name (Common Name)	Address	Built Date	Historic Function	Historic Register Status	Potential Impacts
Fire Station No. 18 – Ballard	5427 Russell Avenue NW, Seattle	1911	Government – Fire Station	Listed on NRHP, WHR, and SLR.	None.
Ballard Avenue Historic District	Ballard Ave from NW Market to NW Dock St, Seattle	1890 – 1930	Commerce / Trade – Business	Listed on NRHP, WHR, and SLR.	None.



Figure 9. Graded lawn and incinerator stack at Fort Lawton; view to the west.



Figure 10. Typical slope at north end of Fort Lawton property; view to the north.



Figure 11. View corridor to cemetery from Texas Way; facing south.



Figure 12. Texas Way & woods east of cemetery; view to southeast.



Figure 13. Leisy Hall and typical parking area; view to south.



Figure 14. Building 222 (left) and Leisy Hall (right); view to north.



Figure 15. Harvey Hall; view to southeast.



Figure 16. South part of Fort Lawton facing south; OMS 211 & 214 at right.



Figure 17. Existing buildings at the project (base map: Google, Inc. 2024).



Figure 18. Overview of Harvey Hall USARC main building (left) and auditorium (right) (DAHP Property # 115861). Image of the northwest elevation, view to the southeast.



Figure 19. Southwest elevation of the southwest wing connected by hyphen to Harvey Hall USARC (left) (DAHP Property # 115861). Image taken from Texas Way, view to the northeast.



Figure 20. Overview of Building 211 at Harvey Hall USARC (DAHP Property # 115861). Image of the southeast elevation, view to the north-northwest.



Figure 21. Overview of Building 214 at Harvey Hall USARC (DAHP Property # 115861). Image of the southwest elevation taken from Texas Way, view to the northeast.



Figure 22. Overview of the Pump House north of Harvey Hall USARC (right) (DAHP Property # 115861). Image taken of the northwest elevation, view to the south-southeast.



Figure 23. North face of the main building at Leisy Hall USARC (DAHP Property # 115862). Image taken from the parking lot, view to the south.



Figure 24. South wing and south wing additions of Leisy Hall USARC (DAHP Property # 115862). Image taken from Texas Way, view to the east.



Figure 25. Northeast elevation of AMSA 79 (Building 222) at Leisy Hall USARC (DAHP Property # 115862). Image taken from Texas Way, view to the southwest.



Figure 26. Overview of Buildings 223 (center) and 228 (background) west of AMSA 79 at Leisy Hall USARC (DAHP Property # 115862). Image taken from Texas Way, view to the west.



Figure 27. Overview of OMS 245 (DAHP Property # 115864). Image taken from Texas Way, view to the east-northeast.



Figure 28. Overview of the Incinerator Stack (DAHP Property # 115865). Image taken from Trail Blazer Field, view to the northwest.

Table 3. Historic built environment resources within the project.

Name / DAHP Property ID	Build Dates	Impacts	Recommendations
Harvey Hall / #115861	1958, 2003	Demolition under the Proposed Action.	Does not meet criteria for Seattle Landmark Designation. Obtain concurrence from DON. Does not meet NRHP or WHR criteria. Obtain concurrence from DAHP.
Building 211 (storage)/ #115861, secondary building	1958	Demolition under the Proposed Action.	
Building 214/ #115861, secondary building	2000	Demolition under the Proposed Action.	
Pump House/ #115861, secondary building	2001	Demolition under the Proposed Action.	
Leisy Hall / #115862	1972, 1976	Demolition under the Proposed Action.	Does not meet criteria for Seattle Landmark Designation. Obtain concurrence from DON. Does not meet NRHP or WHR criteria. Obtain concurrence from DAHP.
Building 222 (AMSA 79) / #115862, secondary building	1972	Demolition under the Proposed Action.	
Building 223 (fuel shed) / #115862, secondary building	1972	Demolition under the Proposed Action.	
Building 228/ #115862, secondary building	1990	Demolition under the Proposed Action.	
Organizational Maintenance Shop (OMS 245) / #115864	1999	No change under Proposed Action.	Does not meet criteria for Seattle Landmark Designation. Obtain concurrence from DON. Does not meet NRHP or WHR criteria. Obtain concurrence from DAHP.
Incinerator Stack / #115865	1934	Demolition under the Proposed Action.	Does not meet criteria for Seattle Landmark Designation. Obtain concurrence from DON. Does not meet NRHP or WHR criteria. Obtain concurrence from DAHP.

Attachment A. Project correspondence between CRC and cultural resources staff of the Duwamish, Muckleshoot, Snoqualmie, and Suquamish tribes.



Duwamish Tribe
John Boddy, Tribal Historic Preservation Officer
4705 W Marginal Way SW
Seattle, WA 98106

November 25, 2024

Re: Cultural Resources Assessment for the Fort Lawton Army Reserve Center Redevelopment
Update Supplemental EIS, Seattle, King County, Washington

Dear John:

I am writing to inform you of a cultural resources assessment for the above referenced project and to seek additional information about the project area the Tribe may be willing to share that is not readily available in other sources. This letter is sent on a technical staff-to-technical staff basis to inquire about project-related cultural information or concerns. It is not intended as formal government-to-government consultation to be initiated by the appropriate regulatory agency.

The project encompasses approximately 34 acres at Fort Lawton in Sections 10 and 15 of Township 25 North, Range 03 East, Willamette Meridian. The project proposes to redevelop the former U.S. Army Reserve Center site with a mix of affordable housing options, including 100 units of permanent supportive multi-family housing for formerly homeless seniors and veterans, 175 units of affordable homeownership opportunities for families, and 225 units of affordable multi-family rental apartments. Existing natural areas will be preserved.

We are currently conducting background research for this project. Background research will include a review of site forms maintained by the Washington State Department of Archaeology and Historic Preservation, previously completed cultural resource reports, and relevant environmental, historical, and cultural publications. Field investigation is planned to include built environment survey and photo-documentation of existing conditions. Results will be presented in a technical memo.

We are aware that not all information is contained in published sources. Should the Tribe have additional information you would be willing to share to support our assessment, we would very much like to include it in our study. Please contact me at ian@crcwa.com or 360.431.3433 should you wish to provide any comments. I appreciate your assistance and look forward to hearing from you.

Sincerely,

Ian Kretzler
Projects Manager

CULTURAL RESOURCE CONSULTANTS, LLC. PO BOX 4159, SEATTLE, WA 98194
PHONE 206.855.9020 - ian@crcwa.com



Muckleshoot Indian Tribe
Laura Murphy, Cultural Resources
39015 172nd Avenue SE
Auburn, WA 98092

November 25, 2024

Re: Cultural Resources Assessment for the Fort Lawton Army Reserve Center Redevelopment
Update Supplemental EIS, Seattle, King County, Washington

Dear Laura:

I am writing to inform you of a cultural resources assessment for the above referenced project and to seek additional information about the project area the Tribe may be willing to share that is not readily available in other sources. This letter is sent on a technical staff-to-technical staff basis to inquire about project-related cultural information or concerns. It is not intended as formal government-to-government consultation to be initiated by the appropriate regulatory agency.

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Sincerely,

Ian Kretzler
Projects Manager

CULTURAL RESOURCE CONSULTANTS, LLC. PO BOX 4159, SEATTLE, WA 98194
PHONE 206.855.9020 - ian@crcwa.com



Snoqualmie Indian Tribe
Steven Moses, Archaeology and Historic Preservation
PO Box 969
Snoqualmie, WA 98065

November 25, 2024

Re: Cultural Resources Assessment for the Fort Lawton Army Reserve Center Redevelopment
Update Supplemental EIS, Seattle, King County, Washington

Dear Steven:

I am writing to inform you of a cultural resources assessment for the above referenced project and to seek additional information about the project area the Tribe may be willing to share that is not readily available in other sources. This letter is sent on a technical staff-to-technical staff basis to inquire about project-related cultural information or concerns. It is not intended as formal government-to-government consultation to be initiated by the appropriate regulatory agency.

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We are aware that not all information is contained in published sources. Should the Tribe have additional information you would be willing to share to support our assessment, we would very much like to include it in our study. Please contact me at ian@crcwa.com or 360.431.3433 should you wish to provide any comments. I appreciate your assistance and look forward to hearing from you.

Sincerely,

Ian Kretzler
Projects Manager

CULTURAL RESOURCE CONSULTANTS, LLC. PO BOX 4159, SEATTLE, WA 98194
PHONE 206.855.9020 - ian@crcwa.com



Suquamish Tribe
Stephanie Trudel, Tribal Historic Preservation Officer
PO Box 498
Suquamish, WA 98392

November 25, 2024

Re: Cultural Resources Assessment for the Fort Lawton Army Reserve Center Redevelopment
Update Supplemental EIS, Seattle, King County, Washington

Dear Stephanie:

I am writing to inform you of a cultural resources assessment for the above referenced project and to seek additional information about the project area the Tribe may be willing to share that is not readily available in other sources. This letter is sent on a technical staff-to-technical staff basis to inquire about project-related cultural information or concerns. It is not intended as formal government-to-government consultation to be initiated by the appropriate regulatory agency.

The project encompasses approximately 34 acres at Fort Lawton in Sections 10 and 15 of Township 25 North, Range 03 East, Willamette Meridian. The project proposes to redevelop the former U.S. Army Reserve Center site with a mix of affordable housing options, including 100 units of permanent supportive multi-family housing for formerly homeless seniors and veterans, 175 units of affordable homeownership opportunities for families, and 225 units of affordable multi-family rental apartments. Existing natural areas will be preserved.

We are currently conducting background research for this project. Background research will include a review of site forms maintained by the Washington State Department of Archaeology and Historic Preservation, previously completed cultural resource reports, and relevant environmental, historical, and cultural publications. Field investigation is planned to include built environment survey and photo-documentation of existing conditions. Results will be presented in a technical memo.

We are aware that not all information is contained in published sources. Should the Tribe have additional information you would be willing to share to support our assessment, we would very much like to include it in our study. Please contact me at ian@crcwa.com or 360.431.3433 should you wish to provide any comments. I appreciate your assistance and look forward to hearing from you.

Sincerely,

Ian Kretzler
Projects Manager

CULTURAL RESOURCE CONSULTANTS, LLC. PO BOX 4159, SEATTLE, WA 98194
PHONE 206.855.9020 - ian@crcwa.com

12/2/24, 8:06 AM

Cultural Resource Consultants, Inc. Mail - 2403J Fort Lawton Army Reserve Center Redevelopment Letter to Duwamish Tribe



Ian Kretzler <ian@crcwa.com>

2403J Fort Lawton Army Reserve Center Redevelopment Letter to Duwamish Tribe

Preservation Department <preservationdept@duwamishtribe.org>

Wed, Nov 27, 2024 at 11:05 AM

To: Ian Kretzler <ian@crcwa.com>, John Boddy <johnboddy@duwamishtribe.org>

Cc: Margaret Berger <margaret@crcwa.com>

Hi Ian,

Thank you for the information regarding the redevelopment at Fort Lawton. Attached are our comments with what is generally known about this area. It is more than likely that the Magnolia area was a place for hunting and potentially gathering and managing resources.

Thank you, Nancy.

[Quoted text hidden]

 **11_27_2024 2403J Seattle Duwamish Tribe Comments.pdf**
141K

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DUWAMISH TRIBE

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11/27/2024

CRC
2403J

Dear Ian Kretzler,

Thank you for the opportunity to comment on the Fort Lawton Army Reserve Center Redevelopment Update Supplemental EIS, to redevelop the former U.S. Army Reserve Center site with a mix of affordable housing options, including 100 units of permanent supportive multi-family housing for formerly homeless seniors and veterans, 175 units of affordable homeownership opportunities for families, and 225 units of affordable multi-family rental apartments located near 4570 Texas Way in Seattle.

Based on the information provided and our understanding of the project and its APE, the Duwamish Tribe would recommend an archaeological survey, especially if any groundbreaking activity occurs below fill, topsoil or other impervious surfaces into native soil. We would also recommend that archaeological monitoring and an inadvertent discovery plan be in place during any excavation into native soils. This is an area that the Duwamish Tribe considers culturally significant and has a High probability to have unknown archaeological deposits. We note that there are 6 historical and ancestral Duwamish place names within about a mile of the project location. We note that the closest place name is a stream called **hiwayq^w**, as noted by Hilbert, Thrush and TT Waterman, that flows northward into Salmon Bay near the Ballard Locks.

The DAHP WISAARD predictive model indicates that an archaeological survey ranges from highly advised with a high risk to very high risk for encountering cultural resources.

We understand that CRC is conducting background research with a field investigation component. We request that if any archaeological work or monitoring is performed, we would like notification. Cultural and archaeological resources are non-renewable and are best discovered prior to ground disturbance. The Tribe would also like the opportunity to be present if or when an archaeologist is on site for ground disturbance.

Thank you,

Duwamish Tribal Historic Preservation

Duwamish Tribal Historic Preservation



Duwamish Tribe | 4705 W. Marginal Way SW, Seattle, WA 98106 | 206-431-1582
www.duwamishtribe.org

12/2/24, 8:42 PM

Cultural Resource Consultants, Inc. Mail - Fort Lawton Army Reserve Center Redevelopment request for information



Ian Kretzler <ian@crcwa.com>

Fort Lawton Army Reserve Center Redevelopment request for information

Taylor Harriman <THarriman@suquamish.nsn.us>
To: Ian Kretzler <ian@crcwa.com>
Cc: Stephanie Trudel <strudel@suquamish.nsn.us>

Mon, Dec 2, 2024 at 9:51 AM

Hello Ian,

Thank you for your email regarding the Fort Lawton Army Reserve Center Redevelopment project. I am currently reviewing the information provided and will get back to you as soon as possible. I will also reach out to the relevant departments within the Suquamish Tribe to ensure we have all the necessary information for the project.

Thank you,

Taylor Harriman

Taylor Harriman

Archaeologist I

Suquamish Tribe

PO Box 498

Suquamish, WA 98392-0498

360-394-8529

tharriman@suquamish.nsn.us

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Attachment B. Inadvertent Discovery Protocol

Protocols for Discovery of Archaeological Resources

The Archaeological Sites and Resources Act (RCW 27.53) prohibits knowingly disturbing archaeological sites without a permit from the Washington State Department of Archaeology and Historic Preservation (DAHP), and the Indian Graves and Records Act (RCW 27.44) prohibits knowingly disturbing Native American or historic graves.

In the event that archaeological resources are encountered during project implementation, the following actions will be taken:

All ground disturbing activity at the find location will stop, and the work supervisor will be notified immediately. The find location will be secured from any additional impacts.

The project proponent will immediately contact the agencies with jurisdiction over the lands where the discovery is located, if appropriate. The appropriate agency archaeologist or the proponent's contracting archaeologist will determine the size of the work stoppage zone or discovery location in order to sufficiently protect the resource until further decisions can be made regarding the work site.

The project proponent will consult with DAHP regarding the evaluation of the discovery and the appropriate protection measures, if applicable. Once the consultation has been completed, and if the site is determined to be NRHP-eligible, the project proponent will request written concurrence that the agency or tribe(s) concurs that the protection and mitigation measures have been fulfilled. Upon notification of concurrence from the appropriate parties, the project proponent will proceed with the project.

Within six months after completion of the above steps, the project proponent will prepare a final written report of the discovery. The report will include a description of the contents of the discovery, a summary of consultation, and a description of the treatment or mitigation measures.

Protocols for Discovery of Human Remains

If human remains are found within the project area, the project proponent, its contractors or permit-holders, the following actions will be taken, consistent with Washington State RCWs 68.50.645, 27.44.055, and 68.60.055:

If ground-disturbing activities encounter human skeletal remains, then all activity will cease that may cause further disturbance to those remains. The area of the find will be secured and protected from further disturbance. The project proponent will prepare a plan for securing and protecting exposed human remains and retain consultants to perform these services. The finding of human skeletal remains will be reported to the county medical examiner/coroner and local law enforcement in the most expeditious manner possible. The remains will not be touched, moved, or further disturbed. The county medical examiner/coroner will assume jurisdiction over the human skeletal remains and make a determination of whether those remains are forensic or non-forensic. If the county medical examiner/coroner determines the remains are non-forensic, then they will report that finding to DAHP, which will then take jurisdiction over the remains. DAHP

will notify any appropriate cemeteries and all affected tribes of the find. The State Physical Anthropologist will make a determination of whether the remains are Indian or Non-Indian and report that finding to any appropriate cemeteries and the affected tribes. DAHP will then handle all consultation with the affected parties as to the future preservation, excavation, and disposition of the remains.

Contact Information

Duwamish Tribe

4705 West Marginal Way SW
Seattle, WA 98106

Primary Contact: John Boddy, Duwamish Tribal Historic Preservation, 206-431-1582

Muckleshoot Indian Tribe

39015 172nd Ave SE
Auburn, WA 98092

Primary Contact: Laura Murphy, Archaeologist/Cultural Resources, 253-876-3272

Snoqualmie Indian Nation

PO Box 969
Snoqualmie, WA 98065

Primary Contact: Steven Moses, Director of Archaeology and Historic Preservation, 425-495-6097

Suquamish Tribe

PO Box 498
Suquamish, WA 98392-0498

Primary Contact: Stephanie Trudel, Tribal Historic Preservation Officer, 360-394-8533

Washington State Department of Archaeology and Historic Preservation (WA DAHP)

P.O. Box 48343, Olympia, WA 98504-8343

Lead Representative: Allyson Brooks, State Historic Preservation Officer, 360-586-3066

Primary Contact: Stephanie Jolivet, Local Government Archaeologist, 360-628-2755

Primary Contact for Human Remains: Guy Tasa, State Physical Anthropologist, 360-790-1633

King County Medical Examiner

908 Jefferson Street
Seattle, WA 98104

Lead Representative: J. Matthew Lacy, MD, Chief Medical Examiner, 206-731-3232

Primary Contact: Dr. Andrew Seidel, State Forensic Anthropologist, 206-731-3232

King County Sheriff

516 Third Avenue, Room W-116
Seattle, WA 98104-2312

Primary Contact: Non-Emergency Line,

Attachment C. Historic Property Inventory Forms

See PDFs.