CITY OF DES MOINES

ZENITH PROPERTIES BUILDING DEMOLITION PERMIT APPLICATION

DRAFT ENVIRONMENTAL IMPACT STATEMENT

JANUARY 2024

CITY OF DES MOINES
Community Development Department
21630 11th Avenue S, Suite D
Des Moines, WA 98198

City of Des Moines
PLANNING, BUILDING AND PUBLIC WORKS
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DES MOINES, WASHINGTON 98198-6398
(206) 870-7576 FAX (206) 870-6544

January 9, 2024

Subject: Project Update - Zenith Properties Building Demolition Application at former Masonic Home/Landmark on the Sound Site

Dear Interested Party,

The City of Des Moines is reaching out to inform you that the City has issued a Notice of Availability and Notice of Public Comment on the Draft Environmental Impact Statement (Draft EIS) for the Zenith Properties Building Demolition Permit Application at the former Masonic Home/Landmark on the Sound.

You can access the Draft EIS and other information by visiting the City of Des Moines project webpage at: www.desmoineswa.gov/zenitheis.

The public comment period is open until February 22, 2024, at 4:30 p.m. PST.
Agencies, tribes, and members of the public are invited to comment on the alternatives, probable significant adverse impacts, mitigation measures, and licenses or other approvals that may be required. You can provide comment on the Draft EIS via the following methods:

Written comments may be submitted:

- Online at: www.desmoineswa.gov/zenitheis
- By mail to:
  City of Des Moines
  Attn: SEPA Official (LUA2019-0032)
  21630 11th Avenue S., Suite D
  Des Moines, WA 98198

Verbal comments may be submitted at a virtual public meeting:
A virtual public meeting will be held on Wednesday, January 31, 2024. The meeting will begin at 6 p.m. with a brief presentation about the Draft EIS, followed by public comments. A court reporter will attend to transcribe verbal comments. All comments will be recorded and become part of the public record. The meeting will end after the last comment is made.

Participants must register to receive the link and join from a computer or tablet on the Zoom platform in order to provide verbal comment during this event.

Register at bit.ly/zenithDEISmeeting

Project overview:
Zenith Properties LLC (Zenith) has applied for a demolition permit to remove all structures of the former Masonic Home/Landmark on the Sound property located at 23660 Marine View Drive South in Des Moines. In 2017, Zenith acquired the approximately 30.3-acre property previously owned by

the Freemasons of Washington. The site includes a main building, multiple outbuildings, outdoor facilities, landscaping and green space.

Zenith has submitted a demolition application as a private property owner on a privately owned piece of land. Zenith has five objectives for the proposed demolition of the existing structures:

- Demolish the existing structures on the Property.
- Remove on-site unsafe conditions/potential hazards due to existing structural conditions.
- Prevent further trespassing within the existing structures.
- Prevent further vandalism to the existing structures.
- Prevent further graffiti to the existing structures.

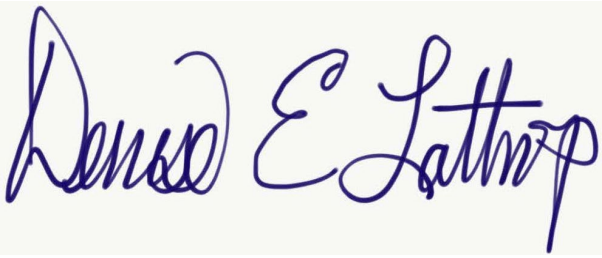
The City of Des Moines SEPA Official has determined this proposal is likely to have a significant adverse impact on the environment, and accordingly, an Environmental Impact Statement (EIS) is required under Revised Code of Washington (RCW) 43.21C.030(2)(c). The City is the Lead Agency for this EIS. A project-level Environmental Impact Statement (EIS) was prepared under SEPA. The project proponent is Zenith.

What happens next?
Once this comment period concludes, City of Des Moines will review and respond to comments on the Draft EIS. A Final EIS will be prepared that contains the responses to the comments and potential updates to the environmental document. The Final EIS may also include a Preferred Alternative. The City anticipates releasing the Final EIS by mid-2024.

For more information, please visit the City of Des Moines project webpage:
www.desmoineswa.gov/zenitheis

Your involvement in this process is greatly valued. Thank you in advance for your time and input.

Sincerely,



Denise E. Lathrop, AICP
Community Development Director and SEPA Official

FACT SHEET DRAFT ENVIRONMENTAL IMPACT STATEMENT

PROJECT NAME

Zenith Properties Building Demolition Permit Application

DATE OF ISSUE OF DRAFT EIS

January 9, 2024

PROPOSED ACTION

Zenith Properties LLC has applied for a demolition permit to remove all structures of the former Masonic Home/Landmark on the Sound property located at 23660 Marine View Drive South in Des Moines, King County, Washington. Zenith has identified the following five objectives for their proposed action:

- Demolish the existing structures on the property.
- Remove on-site unsafe conditions/potential hazards due to existing structural conditions.
- Prevent further trespassing within the existing structures.
- Prevent further vandalism to the existing structures.
- Prevent further graffiti to the existing structures.

PERMITS, LICENSES, AND APPROVALS LIKELY REQUIRED FOR PROPOSAL

- City of Des Moines Demolition Permit.
- City of Des Moines Right-of-Way Permit.

Project Proponent/Applicant

Zenith Properties LLC

SEPA Lead Agency

City of Des Moines

SEPA Responsible Official

Denise E. Lathrop, AICP

Community Development Director and SEPA Official

Authors and Contributors

A list of authors and contributors is provided at the end of this Fact Sheet.

Location of Background Materials

Background materials used in the preparation of this Draft EIS are listed in Chapter 6, *References*.

- City of Des Moines Grading Permit.
- Highline Water District Utility Capping Permit (if required).
- Midway Sewer District Utility Capping Permit (if required).
- Puget Sound Clean Air Agency (PSCAA) Asbestos/Demolition Notification.

PUBLIC COMMENTS ON THE DRAFT EIS

Written Comments		Verbal Comments	
Public Comment Period	This Draft Environmental Impact Statement (Draft EIS) will be available for a 45-day public comment period.	Virtual Public Meeting	A public meeting will be held to receive verbal comments on the Draft EIS from the public and interested parties. A court reporter will be available to receive verbal testimony.
Date Written Comments Are Due	Comments must be received or postmarked by February 22, 2024.	Virtual Public Meeting Date and Time	The public meeting will be held on January 31, 2024, at 6 p.m. A brief introduction will begin at 6 p.m., followed by public comments. The meeting will end once the last comment is made.
Written Comment Submittal and Contact Information	Comments may be submitted online at www.desmoineswa.gov/zenitheis OR By mail to: City of Des Moines Attn: SEPA Official (LUA2019-0032) 21630 11th Avenue S, Suite D Des Moines, WA 98198	Virtual Public Meeting Access	Participants must register at bit.ly/zenithDEISmeeting to receive the link and join from a computer or tablet on the Zoom platform to provide verbal comment during this event.

DOCUMENT AVAILABILITY

The Draft EIS is available online at the Des Moines Community Development Department webpage: www.desmoineswa.gov/zenitheis.

Project-related information can be reviewed on the project website: www.desmoineswa.gov/zenitheis.

For questions about the project or the scoping process, please email ZenithEIS@desmoineswa.gov.

Printed copies of the Draft EIS are available for review at no charge at:

City Hall
21630 11th Avenue S,
Suite D
Des Moines, WA 98198

* Open 9 a.m. to 4 p.m. on Tuesday, Wednesday, and Thursday.

Des Moines Public Library
21620 11th Avenue S
Des Moines, WA 98198

* Open 10 a.m. to 6 p.m. on Monday, Thursday, and Friday; 12 p.m. to 8 p.m. on Tuesday and Wednesday; and 11 a.m. to 6 p.m. on Saturday and Sunday.

Woodmont Public Library
26809 Pacific Hwy S
Des Moines, WA 98198

* Open 10 a.m. to 6 p.m. on Monday, Thursday, and Friday; 12 p.m. to 8 p.m. Tuesday and Wednesday; and 11 a.m. to 6 p.m. on Saturday (closed Sunday).

For questions or to obtain a copy of the document contact:

Denise Lathrop, Community Development Director, at dlathrop@desmoineswa.gov or 206.870.6563.

TIMING OF ADDITIONAL ENVIRONMENTAL REVIEW

After the Draft EIS comment period concludes, the City of Des Moines (Lead Agency) and consultant team will review and respond to comments. A Final EIS will be prepared that contains the responses to the comments and potential updates to the EIS. The City of Des Moines anticipates releasing the Final EIS in mid-2024.

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ABBREVIATIONS

Abbreviation	Definition
BMPs	best management practices
BP	Before Present
CESCL	Certified Erosion and Sediment Control Lead
CFR	Code of Federal Regulations
CMP	Construction Management Plan
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalent
DAHP	Washington State Department of Archaeology and Historic Preservation
dBA	A-weighted decibel
DMMC	City of Des Moines Municipal Code
Ecology	Washington State Department of Ecology
EIS	environmental impact statement
EPA	U.S. Environmental Protection Agency
ESA	Environmental Science Associates
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GCP	General Construction Permit

Abbreviation	Definition
GEO	Governor's Executive Order
GHG	greenhouse gas
GPS	Global Positioning System
HABS	Historic American Buildings Survey
I-5	Interstate 5
IDP	Inadvertent Discovery Plan
IFC	International Fire Code
IPaC	Information for Planning and Consultation
IPMC	International Property Maintenance Code
KCC	King County Code
KCHPP	King County Historic Preservation Program
Ldn	average day-night noise level
Leq	equivalent sound level
Lmax	maximum sound level
mg/kg	milligrams/kilogram
MMT	million metric tons
$MMTCO_2e$	million metric tons of carbon dioxide equivalents
MTCA	Model Toxics Control Act
NA	not applicable
NBBJ	Naramore, Bain, Brady & Johanson
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOx	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
OSHA	Occupational Safety and Health Administration
PHS	Priority Habitats and Species
PM	particulate matter
PPV	peak particle velocity
PSCAA	Puget Sound Clean Air Agency
PUD	planned unit development

Abbreviation	Definition
RCNM	Roadway Construction Noise Model
RCW	Revised Code of Washington
REC	recognized environmental condition
RPA	Registered Professional Archaeologist
RS	Residential Single-Family
SEPA	State Environmental Policy Act
SHA	Society for Historical Archaeology
SHPO	State Historic Preservation Office
SO_2	sulfur dioxide
SOI	Secretary of the Interior
SP	shovel probe
SR	State Route
SSA	Social Security Administration
SWPPP	stormwater pollution prevention plan
TCP	Traditional Cultural Property
THPO	Tribal Historic Preservation Office
USC	United States Code
USFWS	U.S. Fish and Wildlife Service
WAC	Washington Administrative Code
WDFW	Washington Department of Fish and Wildlife
WISAARD	Washington Information System for Architectural and Archaeological Records Data
WSDOT	Washington State Department of Transportation
Zenith	Zenith Properties, LLC

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CHAPTER 1 SUMMARY

1.1 Introduction

The City of Des Moines (City) has prepared this Draft Environmental Impact Statement (Draft EIS) to analyze the potential environmental impacts from a proposed project to demolish the former Masonic Home/Landmark on the Sound property at 23660 Marine View Drive South. The project site is currently owned by Zenith Properties LLC (Zenith). As described later in this chapter, the Draft EIS has been prepared in compliance with the Washington State Environmental Policy Act (SEPA), with Zenith as the project proponent/applicant, and the City of Des Moines as the SEPA Lead Agency.

This chapter provides a summary of the project background; description of the proposal and project area; review of the SEPA process; alternatives analyzed in the Draft EIS; impacts and potential mitigation measures; significant unavoidable adverse impacts; benefits and disadvantages of delaying action on the proposal; areas of controversy and uncertainty; and issues to be resolved. The Chapter 1 summary is based on more detailed information presented in Chapters 2 through 5 of the Draft EIS.

1.2 Project Background and Historic Use of the Property

In 1927, the Freemasons opened and operated the main building on the project site as a Masonic retirement facility. Around 2007, the property was decommissioned and no longer used as a retirement home, and from about 2007 to 2012, the building functioned as a nonprofit event center called Landmark on the Sound. Around 2013, the property was

put on the market for sale, and it was sold in 2019 to the current owner, Zenith. The property is currently unoccupied, and Zenith has secured the site, although a series of break-ins has cosmetic damage to the building resulting from a series of break-ins. The City of Des Moines has deemed the building not safe for use due to fire safety requirements.

Zenith applied to the City for a demolition permit to remove all structures of the former Masonic Home on their property located at 23660 Marine View Drive South (hereafter referred to as the Property). The application is filed under permit number LUA2019-0032 and includes demolition of structures that are eligible for listing on the state and national registers (Zenith 2022). The structures on the property were removed from the City of Des Moines Historical Properties survey on November 30, 2022, pursuant to the Applicant's request.

The City of Des Moines Planning and Building Department is the Lead Agency, under SEPA, for the proposal, and the Community Development Director as the designated SEPA Official has determined that the decision to grant a demolition permit is likely to have a significant adverse impact on the environment and is required under Revised Code of Washington (RCW) 43.21C.030 to prepare an EIS (see Appendix A, *Determination of Significance*). The City has prepared this Draft EIS to analyze potential environmental impacts resulting from the proposal to demolish the structures.

At this time, there is no associated request for development at the site following the proposed demolition of the structures. All structures proposed to be demolished are located on King County tax parcel 1722049023. An applicant-provided Demolition Plan is included as Appendix B.

1.3 Project Objectives

Zenith has submitted a demolition application as a private property owner on a privately owned piece of land. Zenith has identified five objectives for the proposed demolition of the existing structures:

1. Demolish the existing structures on the Property.
2. Remove on-site unsafe conditions/potential hazards due to existing structural conditions.
3. Prevent further trespassing within the existing structures.
4. Prevent further vandalism to the existing structures.
5. Prevent further graffiti to the existing structures.

1.4 Project Area

The project area consists of the existing approximately 30.3 acres at 23660 Marine View Drive South (the Property). The project area is bounded by South 240th Street (south), Marine View Drive South (west), the Judson Park retirement facility (north and west), and single- and multiple-family residential development (north and east).

The Property is west of Interstate 5 (I-5) and 0.15 mile from the shoreline of Puget Sound, at the intersection of South 240th Street and Marine View Drive South, and within the south half of Section 17 in Township 22 North, Range 4 East of the Willamette Meridian.

The existing structures on the site include:

- **Water Tower:** The water tower was built in 1926 as part of a system to provide water for residents. The height of the tower is 136 feet.
- **Former Lodge (Main Building):** The main five-story building was built in 1927 and provided the retirement housing and services for members of the Freemasons, a fraternal order in the state. The infirmary was built as an addition to the main building.
- **Octagonal Pump House:** The one-story pump house was built in 1926 as part of a system to provide water for residents and as a freestanding decorative landscape feature.
- **Front Wall and Gate:** The 550-foot-long front wall and gate were built in 1927 as part of the original designed landscape for the Masonic Home. The gate consists of a wide opening across the driveway.
- **Water Tower Pump House:** The water tower pump house was built in 1926 as part of a system to provide water for residents.
- **Garage:** The garage was built in 1937 to provide parking for the Masonic Home's staff.
- **Outdoor Kitchen:** The one-story outdoor kitchen was built in 1937 to support the gathering of Masonic Home residents and visitors in the part of the eastern woods used as the picnic area.
- **Outdoor Restroom:** The one-story outdoor restroom was built in 1937 to support the gathering of Masonic Home residents and visitors in the part of the eastern woods used as the picnic area.
- **Model Home:** A 4,500-square-foot duplex model home was placed on the site after the original buildings were constructed.
- **Central Oval, West, and North Lawns:** The lawns were built in 1926 as part of the original designed landscape for the Masonic Home. The central oval extends between the front gates and the main building and is flanked by the west lawn. The overall area slopes downward to the west. The north lawn is north of the main building.

- **Eastern Woods:** The eastern woods are part of the 1926 Property and include the part of the woods used as the picnic area to support the gathering of Masonic Home residents and visitors. Vegetation includes a mix of native second-growth deciduous and evergreen trees with an understory of native and invasive shrubs. Added asphalt walkways wind through the area. The picnic area is east of the main building and includes an open glade with grass along with an added paved area around the added covered patio (Peterson 2023).

See **Figure 1-1** for locations of the structures described above. Chapter 3 also provides a figure that shows the location of the front wall and gate; the water tower pump house; the outdoor kitchen; the outdoor restroom; the central oval, west, and north lawns; and the eastern woods. A photograph of the main building structure is shown on **Figure 1-2**.

1.5 SEPA Process and Public Involvement

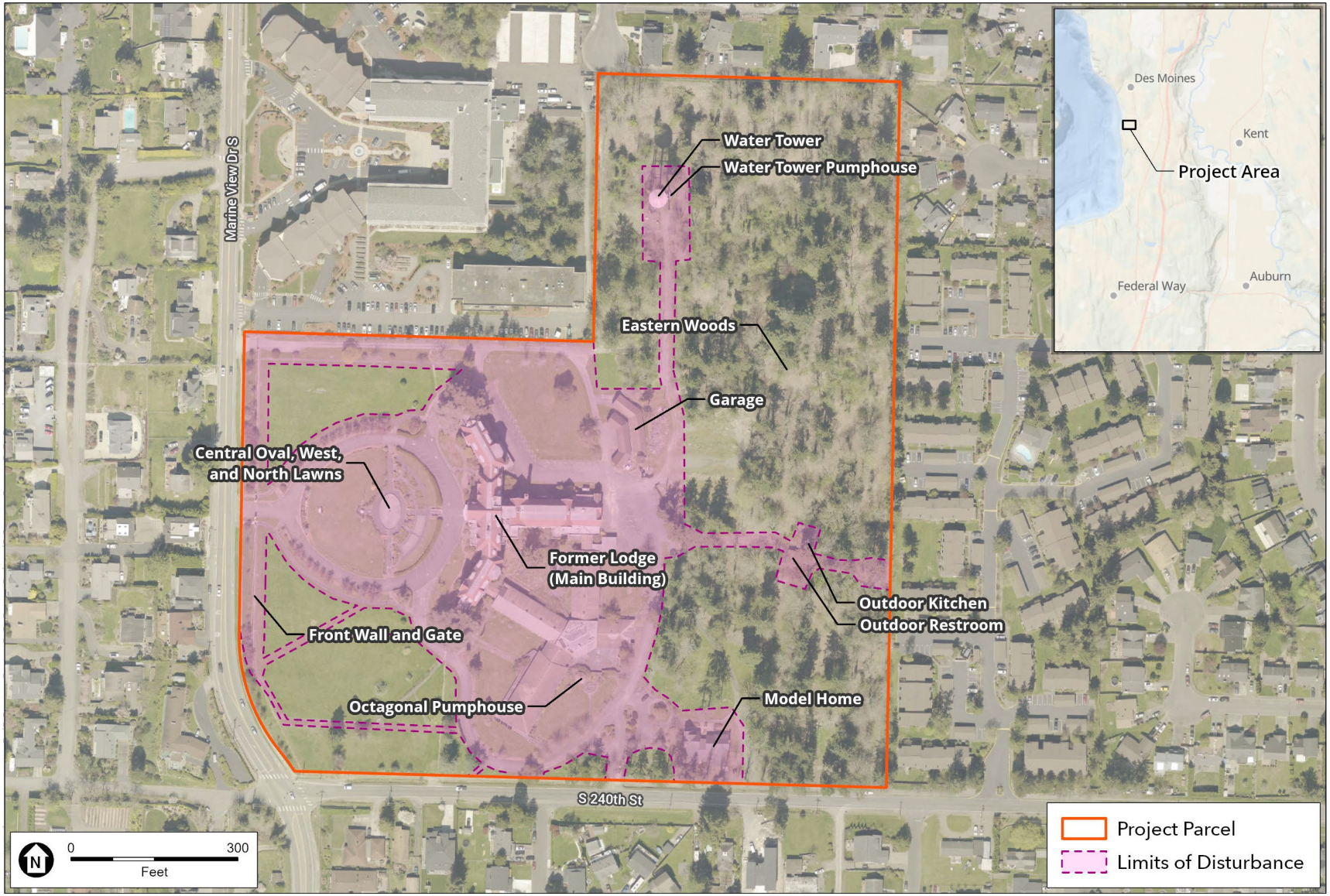
1.5.1 Environmental Review Process

SEPA is a Washington State law that helps agency decision-makers, applicants, and the public understand how a proposal would affect the environment. The City of Des Moines is the SEPA Lead Agency.

The EIS process is a tool for identifying and analyzing probable adverse environmental impacts, reasonable alternatives, and potential mitigation. An EIS must inform decision-makers and the public of reasonable alternatives, as well as mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality.

Community members have the opportunity to comment on the project during two stages of the EIS process:

- **Scoping Stage (Complete):** Scoping is the first step in the EIS process. The City issued a Determination of Significance for the project, which is provided in Appendix A.
- **Draft Environmental Impact Statement (Draft EIS) Stage:** The EIS analyzes the environmental concerns identified during scoping. The purpose of the analysis is to estimate the nature, severity, and duration of impacts that might occur and to compare the impacts of the alternatives. Comments will be received on the analysis of the affected environment, the impact analysis, and potential mitigation measures for each of the alternatives included in the Draft EIS.



SOURCES: Imagery: EagleView Technologies, Inc., 2021; Parcel: King County, 2022; Buildings: DAHP WISAARD

FIGURE 1-1 **Vicinity and Site Map**

Photo by ESA 2023

FIGURE 1-2 **Former Lodge (Main Building) Structure**

1.5.2 Scoping

The scoping process identifies the range of potential significant impacts on the built and natural environment that should be considered and evaluated in an EIS.

The City conducted the scoping phase of the EIS process for this project from May 3, 2022, through June 2, 2022. Because of an error in noticing, the project was re-noticed, and a second scoping period was provided from July 27, 2022, through August 25, 2022. All scoping comments received during these comment periods are documented in the public record (City of Des Moines 2022). During scoping, members of the public learned more about the proposed project, the EIS process, and the draft alternatives and were able to submit comments. The scoping stage for this environmental review process is complete. See Appendix C, *Scoping Summary Report*.

Many comments received expressed a preference for Alternative 2, *Historic Preservation and Adaptive Reuse*, and noted an interest in preservation of the building structures.

Comments also addressed concerns about the potential demolition and construction impacts on the surrounding community. Some of the comments related to how proposed demolition and potential new construction align with sustainability goals for Washington State and the region. Specific concerns were received about potential impacts from demolition on water, air, noise, traffic, and plants and animals.

The City is moving forward with the analysis of cultural resources with details of historic preservation in one chapter and the focus on archaeological resources provided in the next. Each of the chapters analyzes the alternatives in the Draft EIS.

- Cultural Resources – Historic Preservation (Chapter 3)
- Cultural Resources – Archaeological (Chapter 4)

Many scoping comments were received with concerns about potential demolition and construction impacts. Many SEPA EISs include analysis of short-term demolition or construction impacts in the discussion of each element of the environment. Since this EIS does not include elements of the environment other than cultural resources, the City made a decision to include a chapter in the EIS that provides information on demolition impacts for multiple elements of the environment. This chapter is not a formal analysis of the alternatives in this Draft EIS, but it provides due diligence in terms of responding to scoping comments. This chapter is labeled as:

- Construction Impacts from Demolition (Chapter 5)

This Draft EIS was prepared pursuant to the SEPA Rules (Washington Administrative Code [WAC] 197-11), Chapter 16.05 of the Des Moines Municipal Code (DMMC), and Chapter 43.21C RCW. This project-level Draft EIS describes potential adverse environmental impacts of each alternative and describes potential mitigation measures to reduce adverse impacts. The SEPA process is designed to inform decision-makers and the public regarding reasonable alternatives, potential adverse environmental impacts, and reasonable mitigation measures associated with a proposal. This Draft EIS document is not an authorization for an action, nor does it constitute a decision or a recommendation for an action.

The permitting actions for the proposed demolition proposal include the following:

- City of Des Moines Demolition Permit.
- City of Des Moines Right-of-Way Permit.
- City of Des Moines Grading Permit.
- Highline Water District Utility Capping Permit (if required).
- Midway Sewer District Utility Capping Permit (if required).

- Puget Sound Clean Air Agency (PSCAA) Asbestos/Demolition Notification.
- Possible nighttime construction work variance pursuant to Chapter 18.185 DMMC.

Additional information appears in the appendices and includes the following:

- **Appendix A, *Determination of Significance*.** The City issued the SEPA threshold determination on May 3, 2022, and a copy is provided in this Draft EIS.
- **Appendix B, *Demolition Plan*.** The applicant provided a demolition plan including preliminary work plans, proposed construction best management practices (BMPs), and a plan showing the limits of disturbance proposed for the demolition alternative.
- **Appendix C, *Scoping Summary Report*.** This report provides an overview of the scoping process and the summary of comments received to assist the City in determining the final scope for the Draft EIS.
- **Appendix D, *Historic Report*.** *The Masonic Home of Washington Report* was prepared by David Peterson Historic Resource Consulting. The report was written in June 2023 at the request of Zenith Properties LLC, the owner of the Property since 2019. The report provides historical and architectural information about the former Masonic Home in Des Moines, Washington, including individual structures. Information in this report was used by the City's historic resource consultants to prepare the impact analysis and proposed mitigation measures for the Draft EIS.
- **Appendix E, *Feasibility Analysis Report*.** The evaluation of financial considerations relative to potential adaptive reuse of the main building is found in the May 22, 2023, *Zenith Properties LLC Des Moines Masonic Lodge Economic Feasibility Analysis*. Information is summarized below in Exhibit 1, The Summary Results and Feasibility Gap by Use, prepared in 2022, which was excerpted from the above-referenced report to provide context and additional information for the Draft EIS. Pursuant to DMMC 16.05.170 (1), information on economics and cost-benefit analysis will be taken into consideration by the City in review of the demolition application.

Exhibit 1. Summary Results and Feasibility Gap by Use

Source: ECONorthwest, 2022

	Multifamily rental	Senior housing	Midscale hotel	Upscale+ hotel
Total leasable area (square feet / hotel rooms)	72,000 square feet		208 hotel rooms*	
Total revenue	$1.61 million	$2.05 million	$5.81 million	$12.43 million
Total NOI	$1.28 million	$1.48 million	$1.51 million	$2.78 million
Total value (assuming a 5% cap rate*)	$25.62 million	$29.68 million	$30.21 million	$55.73 million
Total cost	$128.61 million	$128.61 million	$153.93 million	$156.44 million
Yield on cost	**1.00%**	**1.15%**	**0.98%**	**1.78%**
Yield Target Performance	**-500.0%**	**-421.7%**	**-512.2%**	**-321.3%**
Subsidy needed	**-$107.25 million**	**-$103.85 million**	**-$128.75 million**	**-$119.30 million**
Subsidy needed after incentives	**-$50.78 million**	**-$47.4 million**	**-$62.45 million**	**-$52.99 million**
Subsidy needed after incentives (assuming lower stabilization costs)**	**-$44.69 million**	**-$41.3 million**	**-$56.36 million**	**-$46.89 million**

*The hotel room count is approximately the same area, in terms of square feet, as the multifamily and senior housing.

**See Exhibit 16 for details on lower stabilization costs. Though costs are reduced, there is a commensurate reduction in the eligible basis for historic tax credits and special property assessments, and therefore the value of these incentives.

- **Appendix F, *Cultural Resources Investigation Report*.** The *Cultural Resources Investigation Report, Zenith Property, Des Moines, King County, Washington* was prepared by HDR Engineering, Inc. (HDR) on January 23, 2023. HDR was retained by the applicant to complete a cultural resources investigation of the Project Area to support Zenith Properties' demolition permit application to the City of Des Moines (LUA2019-0032), which requires review under SEPA. The investigation complied with the Revised Code of Washington and included a background review and field survey to identify cultural resources that could potentially be impacted by the project and to provide recommendations regarding their significance and potential project effects. This report was used by the City's archaeology consultant from Environmental Science Associates (ESA) to prepare the SEPA analysis of potential impacts and potential mitigation measures.
- **Appendix G, *Cultural Resources Inadvertent Discovery Plan*.** The applicant retained HDR to prepare an inadvertent discovery plan (IDP) for the demolition application. The IDP outlines procedures to perform in the event of an unanticipated discovery of cultural resources. It was prepared for implementation during project construction.

- **Appendix H, *Wetland Site Memorandum*.** The City retained ESA to conduct a wetland determination at the Zenith project site on August 31, 2023. This memo documents the results and concludes that no critical areas or buffers were found at the site in question located near the existing water tower.
- **Appendix I, *Tree Evaluation Locations*.** The applicant provided the locations of existing trees on the site with a designation of which trees are proposed for demolition, identified by number in red.
- **Appendix J, *Air Quality and Greenhouse Gas Emissions Calculations*.** Air quality and greenhouse gas emission calculations conducted by ESA for the construction impacts chapter for construction impacts air quality analysis are provided in this appendix.
- **Appendix K, *Noise*.** Construction noise model outputs conducted by ESA for the construction impacts chapter for the construction noise analysis are provided in this appendix.

Following issuance of the Draft EIS, there will be a 45-day comment period, when comments on the document can be submitted to the City. The public is encouraged to comment on the Draft EIS; the Final EIS will respond to comments received on the Draft EIS.

1.6 Alternatives Evaluated in the Draft EIS

Alternatives are different ways of achieving a project's purpose and need, and they serve as the basis for environmental analysis relative to elements of the environment. The following three alternatives are evaluated in this Draft EIS—more detailed information is included in Chapter 2, *Alternatives*.

1.6.1 No Action Alternative

The No Action Alternative serves as a baseline condition for comparison with the other alternatives and describes impacts if the proposed action does not proceed. There would be a continuation of existing site conditions, including retention of the existing structures as vacant and unutilized.

1.6.2 Alternative 1: Demolition Alternative

Alternative 1 assumes demolition of all existing structures and vacant buildings on-site, including the main building (approximately 129,680 square feet), the infirmary wing and addition (approximately 18,982 square feet), the duplex model home structure (approximately 4,500

square feet) at the southeast corner of the site, two maintenance buildings (each approximately 2,500 square feet), the on-site water tower and pump house, the outdoor kitchen, the patio, the outdoor restroom, the garage, the model home, the octagonal pump house, the fountain, front wall and gate, and associated landscape elements. Additional work would include removing existing building foundations and utilities, including water, sewer, and gas.

1.6.3 Alternative 2: Historic Preservation and Potential Future Adaptive Reuse Alternative

Alternative 2 assumes that Zenith preserves and structurally stabilizes all of the existing structures on-site and in a condition that may allow for potential future adaptive reuse. The components of the structural stabilization include foundations, structural, roofing, and exterior envelope, as well as a reasonable evaluation of the viability of applying preservation strategies to the structures, including a cost-benefit analysis that incorporates a reasonably available historic preservation program and tax incentives. However, no specific potential future uses are proposed as part of this alternative. The proposal does not meet the applicant's objectives. There is allowance in the Washington Administrative Code (WAC) for alternatives to approximate the applicant's objectives.

1.7 Summary of Impacts, Potential Mitigation Measures, and Key Findings

This section describes the results of the environmental evaluation of alternatives further detailed in Chapters 2 through 5. Where impacts are identified, mitigation is provided in the form of regulations and commitments (e.g., critical areas regulations) and other proposed mitigation measures that the City may consider applying through policies, codes, or other strategies to address potential impacts. The reader is encouraged to review this section to find areas of interest and to read the more detailed analyses in the following chapters to have the full context of the affected environment, impact analysis, detailed mitigation measures, and overall findings. See **Table 1-1** for a summary of potential impacts and mitigation measures.

TABLE 1-1 Summary of Potential Impacts and Mitigation Measures

	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Future Adaptive Reuse
CULTURAL RESOURCES – ARCHAEOLOGICAL			
Impacts	The potential exists for significant adverse impacts on unrecorded archaeological resources from ground disturbance.	Same as No Action	Same as No Action
Measures to reduce or eliminate impacts	To avoid encountering unrecorded archaeological resources, exclusionary fencing should be installed around the boundary of the archaeological survey. Develop and implement an inadvertent discovery plan (IDP) during construction (Appendix G). The IDP will outline the process to follow in the event of any inadvertent discoveries during ground-disturbing activities.	Same as No Action	Same as No Action
CULTURAL RESOURCES – HISTORIC PRESERVATION			
Impacts	Potential operational impacts over time would be related to ongoing vacancy, neglect, and the impact of both natural and human-driven forces on the Property. If no other future proposal for the Property moved forward, the No Action Alternative is expected to result in the deterioration and eventual loss of the historic resources within the project area due to neglect, the impact of natural forces, and the impact of human-driven forces. These all increase the severity of one another. This includes exposure to the elements with maintenance only to the extent necessary to comply with the International Property Maintenance Code (IPMC) Section 301.3, natural or human caused fire, and vandalism. Neglect may also result in the loss of buildings and structures through condemnation per City of Des Moines code as	Alternative 1 would result in demolition impacts. The Demolition Alternative would include the following impacts: Full demolition of historic resources, substantial demolition of historic resources, and/or partial demolition of historic resources. Under the Demolition Alternative, most of the historic resources identified in Table 3-3 would be fully or substantially demolished. The exceptions to this are the partial demolition of the front wall and gate, and the eastern woods. The demolition work would result in a loss of integrity for the eligible Masonic Home of Washington Historic District identified in Table 3-2 such that the historic district would no longer retain its ability to convey its significance due to the loss of those contributing resources that qualify it for listing or designation in a historic register. **Impacts would be significant.**	Alternative 2 would result in construction impacts since work would occur to mothball the historic resources. Potential operational impacts over time would be related to ongoing vacancy, the impact of both natural and human-driven forces on the Property, and renewal as needed of temporary protective measures.

	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Future Adaptive Reuse
	hazardous or blighted. Neglect of the Property would result, at different rates, in the loss of integrity to all historic resources identified such that the individual resources no longer retain their ability to convey their significance and may lose those characteristics that qualify them for listing or designation in a historic register or contributing to the eligible Masonic Home of Washington Historic District identified in Table 3-2. Loss of historic resources would result in a loss of integrity for this eligible historic district such that the historic district no longer retains its ability to convey its significance due to the loss of those contributing resources that qualify it for listing or designation in a historic register. **Impacts would be significant.**	No potential operational impacts over time are anticipated since resources would have been removed and no ongoing activity is identified for the Property.	
Measures to reduce or eliminate impacts	Vacant buildings and land in Des Moines must comply with the IPMC and comply with Chapter 7.44 DMMC, DMMC 14.05.120, and DMMC 18.195.210 for the management of weeds, excess plant growth, and overhanging, obstructing, and nuisance vegetation. Section 301.3 of the IPMC requires maintaining clean, safe, secure, and sanitary conditions as part of minimum maintenance. The International Fire Code (IFC) Section 311.1 requires the safeguarding and a minimum level of maintenance in compliance with IFC Sections 311.1.1 through 311.6.	The following mitigation measures are proposed as part of this Draft EIS. The intent is for all of these mitigation measures to be completed based on the state level of significance under National Register Criteria for Evaluation A and C and the scale of the historic resources consisting of an eligible historic district with 10 eligible contributing resources, three of which are also individually National Register eligible. • Prepare Historic American Buildings Survey (HABS) Level II Documentation for the entire eligible Masonic Home of Washington Historic District with the Washington State Department of Archaeology and Historic Preservation (DAHP) as the repository. This would provide a public record of original construction, subsequent alterations, and conditions immediately prior to removal of the resources. This would reformat background assembled for the 2023 *Masonic Home of Washington Historic Report* per HABS standards	No additional mitigation is required.

	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Future Adaptive Reuse
		and include copies of original drawings and high-resolution digital photographs. • Allow salvage companies, such as SecondUse and similar, on-site prior to demolition for architectural salvage work for resale purposes to support waste stream diversion of building materials. • Onetime mitigation payment to the City to provide funding for DAHP to undertake and fund the preparation of a statewide women's history historic context, statewide reconnaissance-level survey of at least 50 resources (new and updated historic property inventory forms), and preparation or updating of at least one National Register of Historic Places nomination. Mitigation payments are calculated as percentages of the total 2023 King County appraised value for land and improvements within the eligible Masonic Home of Washington Historic District, recorded by the Assessor as $11,615,600. The Assessor's appraised value places a market value for the full property including both the land and the buildings. The amount to be at least 1 percent ($116,156) of the total 2023 King County appraised value for land and improvements within the eligible Masonic Home of Washington Historic District. This recognizes the importance of the eligible Masonic Home of Washington Historic District and its loss relative to women's history in Washington State. The survey contracting, management, and completion would be managed by DAHP as the entity with expertise and statewide capacity in this area. • Onetime mitigation payment to the City to provide funding for DAHP to undertake and fund the preparation of a statewide historic context, statewide reconnaissance-level survey of at least 50 resources	

	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Future Adaptive Reuse
		(new and updated historic property inventory forms), and preparation or updating of at least one National Register of Historic Places nomination for social organizations (e.g., fraternal orders and masonic organizations). The intent is to better understand the role of women and different ethnic groups in shaping social organizations within the state. This work would identify what organizations existed within the state, the role of women and different ethnic groups relative to establishing and participating in these social organizations, and the property types associated with these organizations. The amount to be at least 1 percent ($116,156) of the total 2023 King County appraised value for land and improvements within the eligible Masonic Home of Washington Historic District. This recognizes the statewide importance of the eligible Masonic Home of Washington Historic District and its loss relative to social organizations in Washington State. The survey contracting, management, and completion would be managed by DAHP as the entity with expertise and statewide capacity in this area. • Onetime mitigation payment to the City for a dedicated preservation fund established and managed by the City of Des Moines. This fund will be used exclusively for the repair and rehabilitation of City of Des Moines-owned or managed Des Moines Landmarks, Properties of Local Significance, or National Register of Historic Places-listed properties. The intent is to provide support within the City of Des Moines for the retention of historic resources used by the public. The amount to be 6 percent ($696,936) of the total 2023 King County appraised total for land and improvements within the eligible Masonic Home	

	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Future Adaptive Reuse
		of Washington Historic District. This recognizes the local role of the eligible Masonic Home of Washington Historic District and its loss relative to the City.	
CONSTRUCTION IMPACTS – NOISE AND VIBRATION			
Impacts	None	While demolition noise would be below the Federal Transit Administration (FTA) daytime criteria of 90 dBA Leq (i.e., A-weighted decibels, equivalent sound level) for residential uses, construction during daytime hours would exceed the noise standards of DMMC 18.185.050, which dictates that noise levels shall not exceed 55 day-night average sound level (Ldn) dBA, or existing levels, whichever is greater. Existing noise levels are likely in the range of 60 to 65 dBA. Demolition activities could expose people to, or generate, noise levels that would result in sustained and substantial annoyance and disruption of activities for receptors. Therefore, the potential exists for a temporary but substantial demolition-related noise impact.	Less than Alternative 1
Measures to reduce or eliminate impacts	None	DMMC 18.185.060 requires a noise mitigation plan for projects that would exceed existing levels for residential areas. The mitigation plan must be submitted to the Planning & Building and Public Works Departments of the City for review and approval before required permits are issued to allow the project to proceed. A mitigation measure to implement a Noise Mitigation Plan is identified to address this noise impact.	None
Impacts	None	The use of a dozer would be the highest contributor of vibration during project construction. Vibrations from demolition activities on nearby buildings and receptors during construction would be a minor (less-than-significant) impact. If a rock crusher is used on-site, it	None

	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Future Adaptive Reuse
		would also have a temporary adverse impact on nearby sensitive receptors.	
Measures to reduce or eliminate impacts	None	Prior to the issuance of the demolition permit, the project applicant shall prepare a Construction Noise Reduction Plan, to be implemented as development occurs throughout the project site to address noise from demolition of buildings as mitigation to keep the impacts to below a level of significance. The plan shall be submitted to Planning, Building, and Public Works Departments of the City for review and approval. The project must comply with the City of Des Moines noise ordinance. BMPs during demolition may include: • Use of concrete processor attachments (jaw attachments) over hydraulic hammers whenever possible. • Processing of concrete debris (including rock crushing) prior to removal from the site to limit noise caused during loading of trucks. • Minimize demolition debris drop height during building demolition; additionally, minimize the size of dropped debris through careful and methodical demolition methods. • Maintain existing vegetation to act as a natural sound barrier to properties located to the northeast and east of the site. • Conduct work in a manner that shortens the overall duration to the maximum amount safely possible to limit total demolition duration. • Train workers and subcontractors to use equipment in ways that minimize noise generation.	None

	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Future Adaptive Reuse
CONSTRUCTION IMPACTS - AIR QUALITY AND GREENHOUSE GAS EMISSIONS			
Impacts	None	Air and fugitive dust emissions may occur during demolition and could have adverse impacts on nearby sensitive receptors.	Less than Alternative 1
Measures to reduce or eliminate impacts	None	Work under the Demolition Alternative is prescribed to follow all applicable federal, state, and local regulations for air quality and dust management. In addition to the control of dust via water, air monitoring shall take place at the beginning of the project to verify that no significant hazardous emissions are being generated by the work or leaving the site and to keep the impact level to below a level of significance. BMPs may include: • Dust will be controlled during demolition using water supplied by various means. Hydrant-provided water shall be supplied to the work area and manually sprayed on work areas as needed to control fugitive dust emissions. • High-reach excavators are equipped with plumbing that would deliver a constant stream of dust control water to the tool location, which shall always operate when work is being performed. • The use of dust cannons shall be used to control dust during the demolition. Dust cannons use a high-powered fan to aerosolize the water, allowing it to better capture fine dust particles at long range and are especially efficient at neutralizing dust created during concrete and masonry demolition.	None

	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Future Adaptive Reuse
CONSTRUCTION IMPACTS – EARTH AND ENVIRONMENTAL HEALTH			
Impacts	None	Construction activities could result in temporary impacts on stormwater runoff quality (e.g., from erosion and sedimentation, as well as pollutants from construction equipment and construction materials).	Less than Alternative 1
Measures to reduce or eliminate impacts	None	Temporary erosion and sediment control measures and BMPs will be implemented to limit sediment inputs to receiving waters during and after construction.	None
	None	Demolition of existing structures could disturb asbestos-containing materials where present. Asbestos-containing materials would be removed during demolition. Soils impacted by the Tacoma Smelter Plume may be in the area of excavation during the demolition activities. Appropriate demolition and disposal practices would be implemented during asbestos removal, ensured through compliance with applicable federal, state, and local planning requirements set forth in all appropriate permits and approvals obtained prior to construction. Removal of soils should include testing to determine if the soils related to the Tacoma Smelter Plume are above Method A levels and should be disposed of in accordance with Ecology's Clean-Up guidance.	None

	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Future Adaptive Reuse
CONSTRUCTION IMPACTS – PLANTS AND ANIMALS			
Impacts	None	**Eagles:** A significant impact on bald eagles is possible if bald eagles are nesting on the subject parcel within 300 feet of demolition activities. Demolition activities have the potential to cause injury, death, or harassment. **Trees:** Approximately 65 trees within the limits of disturbance have the potential to be removed or damaged (see Appendix I, *Tree Evaluation Locations*). The trees proposed for removal are shown in red. **Other Vegetation:** The primary long-term impacts of the Demolition Alternative on plants and animals are the direct and indirect effects of removing trees and vegetation.	None
Measures to reduce or eliminate impacts	None	**Eagles:** Pre-construction bald eagle nest surveys shall be implemented to determine the presence of active bald eagle nests on or nearby the site. If nests are present, implementation of the National Bald Eagle Management Guidelines (2007), including possible construction timing limitations and consultation with the U.S. Fish and Wildlife Service (USFWS) and Washington Department of Fish and Wildlife (WDFW), would result in less-than-significant impacts on nesting bald eagles, if present. **Trees:** Trees identified for removal shall be marked clearly and inventoried. Trees that are not marked for removal shall be protected to the maximum extent possible using tree protection fencing, or other means, to avoid impacts on trees. In addition, the City of Des Moines Tree Ordinance shall be implemented and tree removal permit obtained, to protect and mitigate tree impacts.	None

	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Future Adaptive Reuse
		Other Vegetation: Efforts would be made during demolition to preserve existing vegetation where possible. The limits of disturbance shall be marked with high-visibility fencing or other suitable means to protect trees and vegetation. Where possible, vegetation within the limits of disturbance shall not be disturbed.	
CONSTRUCTION IMPACTS – WATER QUALITY			
Impacts	None	Construction activities could result in temporary impacts on stormwater runoff quality (e.g., from erosion and sedimentation, as well as pollutants from construction equipment and construction materials). Temporary erosion and sediment control measures will be implemented to limit sediment inputs to receiving waters during and after construction.	Less than Alternative 1
Measures to reduce or eliminate impacts	None	The following water quality BMPs shall be applied as part of the project to mitigate the impacts to below a level of significance: • Stormwater and/or water generated during dust control operations shall be diverted from the work area. Erosion control shall be placed along the perimeter of the work area, which shall include silt fencing around all downhill sides of work areas to infiltrate drain through the soil. Straw wattle will be used over hardscapes and around catch basins. All catch basins on-site shall have catch basin inserts placed inside them prior to any work taking place. • Existing vegetation and grass outside the limits of disturbance shall be undisturbed and used as a vegetative barrier along the perimeter of the project as possible. • Existing site hardscapes and driveways within the limits of disturbance will be removed, except where	None

	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Future Adaptive Reuse
		used as construction traffic paths. These paths shall be kept swept and free of debris at all times to mitigate track out. • Additional BMPs shall be used as necessary during the demolition process. • The project applicant or its construction contractor shall maintain a full-time Certified Erosion and Sediment Control Lead (CESCL) familiar with the project that shall perform weekly inspections of existing BMPs and make recommendations of increased BMPs. In addition, the following standard water quality BMPs for construction will be implemented in accordance with regulatory permit requirements. • Cleared areas shall be restored and replanted with appropriate native species to stabilize soils following construction activities. • Implementation of proper waste handling measures shall apply to prevent spillage of building debris and releases of other construction materials. • Pollution control measures will be implemented to ensure appropriate storage, handling, and use of petroleum products and other potential pollutants on-site during construction. Spill response materials will be maintained on-site during construction. • Construction will be conducted in accordance with the conditions of all applicable permits issued by regulatory agencies. • A construction Stormwater Pollution Prevention Plan (SWPPP) will be developed and implemented to cover all areas of work on the project site, and specify that:	

	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Future Adaptive Reuse
		– Waste materials will be transported off-site and disposed of in accordance with applicable regulations and as noted in the SWPPP. – Construction entrances, wheel washes, street cleaning, and other BMPs will be used to prevent tracking of soils beyond the project limits. – Stormwater from work areas will be kept separate from non-work areas. – The locations of existing inlets and catch basins will be identified in the SWPPP and the method of protection described. – Specify locations, protections, and covering practices for stockpiles. – Provide controls to prevent sediment, debris, and other pollutants from entering surface waters and drainage features. • Develop and implement a Spill Plan to ensure that all pollutants and products are controlled and contained. • BMPs for concrete work include the following: – No new concrete work is anticipated, but if required for temporary use would be covered and protected from rainfall until cured. • Adequate material and procedures to respond to unexpected weather conditions or accidental release of materials will be available on-site.	

	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Future Adaptive Reuse
CONSTRUCTION IMPACTS - TRAFFIC			
Impacts	None	Demolition activities throughout the duration of the Demolition Alternative would vary, and so would the associated truck activity. Peak demolition activities involve no more than 10 entering and 10 exiting truck trips per hour. Over the duration of work, waste and recyclable debris generated are anticipated to be under 900 truckloads of material from the site.	None
Measures to reduce or eliminate impacts	None	As needed, the City of Des Moines issues right-of-way use permits for short-term disruptions of pedestrian and vehicular traffic. Although such disruption is not anticipated to occur with the Demolition Alternative, specific measures would be incorporated into the permit requirements to keep the potential impacts to below a level of significance for any construction-related transportation impacts. The applicant would implement Haul Route requirements in Section 15 of the Street Development Standards including: • Construction traffic routes for haul operation – physical asset assessment and monitoring (pavement condition). • Traffic avoidance impact measures – Physical asset assessment, monitoring, and restoration. Prior to the issuance of any demolition permits or other site altering permits, the project applicant will prepare a Construction Management Plan (CMP) that specifies measures and guidance for construction period transportation to avoid any adverse conflicts. The project will adhere to the CMP.	None

1.8 Significant Unavoidable Adverse Impacts

Significant unavoidable adverse impacts are those adverse impacts that would remain even after applying mitigation measures or for which no mitigation measures would be effective. They are listed and described below.

1.8.1 No Action Alternative

Significant unavoidable adverse impacts because of permanent changes to historic resources include:

- Deterioration and eventual loss of individual historic resources in the project area.

1.8.2 Alternative 1: Demolition Alternative

Significant unavoidable adverse impacts include:

- Full, substantial, and partial loss of individual historic resources through demolition.
- The Property has been deemed eligible as a historic district, referred to as the Masonic Home of Washington Historic District. It has 10 eligible contributing resources identified within the project area. Three of the eligible contributing resources are also individually National Register eligible. Loss of the eligible Masonic Home of Washington Historic District through demolition of eligible contributing resources.
- The potential exists for a temporary but substantial demolition-related noise impact. Existing noise levels are likely in the range of 60 to 65 A-weighted decibels (dBA), as discussed in Chapter 5. Noise generated from demolition activities could expose sensitive receptors to, or generate, noise levels that would result in sustained and substantial annoyance and disruption of activities for receptors. This is especially true if building materials are crushed on-site during demolition activities.

1.8.3 Alternative 2: Historic Preservation and Potential Future Adaptive Reuse Alternative

- Loss of the eligible Masonic Home of Washington Historic District due to the eventual loss of individual historic resources within the project area.

1.9 Benefits and Disadvantages of Delaying the Proposal

The EIS must discuss the benefits and disadvantages of delaying implementation of the proposal (WAC 197-11-440(5)(c)).

If the City of Des Moines chooses to delay granting the permit for the building demolition, potential benefits would include the following:

- Delaying construction impacts and perhaps avoiding potential impacts on removal of the buildings as well as construction impacts.
- Delay does not meet the applicant's objectives.
- Delay may result in potential increased security risks and calls for City services for fire and law enforcement.
- Providing more certainty regarding whether the buildings will remain.

Disadvantages of delaying granting the building demolition application include the following:

- There would be a delay in meeting the applicant's objective to demolish the structures on-site.
- The site may remain in its existing condition and require maintenance to avoid deterioration. The site would retain the existing structures unless or until some other renovation is proposed and approved and would result in continued costs for site security.
- Demolition costs could increase, and there may be a need for new environmental, economic, and design studies, depending on the length of delay and changes in other conditions.

1.10 Significant Areas of Controversy and Uncertainty

Controversy around the potential building demolition has focused largely on the potential for historic preservation impacts. These issues were raised prior to and during EIS scoping; in response, the City has undertaken a comprehensive, detailed evaluation of historic preservation impacts, which are discussed in this Draft EIS in Chapter 3.

An area of uncertainty includes the future for the Property across all three alternatives.

1.11 Issues to Be Resolved

The future of the site is uncertain for each of the alternatives:

- For the No Action Alternative, it is not known how long the building would need to be maintained.
- For Alternative 1: Demolition, it is not known how future development at the site may look.
- For Alternative 2: Historic Preservation and Future Adaptive Reuse, it is not known who would fund the work or how long the preservation efforts would last.

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CHAPTER 2 ALTERNATIVES

2.1 Description of Alternatives

This chapter provides an overview of the proposed Zenith Properties Building Demolition project and the alternatives being considered in the Draft EIS. The alternatives described include the *No Action Alternative*; Alternative 1, *Demolition Alternative*; and Alternative 2, *Historic Preservation and Potential Future Adaptive Reuse Alternative*.

2.1.1 No Action Alternative

SEPA requires the analysis of the No Action Alternative. This alternative serves as the baseline condition against which the action alternatives are evaluated and compared.

Under the No Action Alternative, there would be a continuation of the existing site conditions, no investment in ongoing operations or monitoring, minimum maintenance, and the ongoing state of existing historic resources as vacant.

The Des Moines Municipal Code (DMMC) requires minimum landscape maintenance by the property owner (Chapter 7.44 DMMC, DMMC 14.05.120, and DMMC 18.195.210); but only to the extent of management for weeds, excess plant growth, and overhanging, obstructing, and nuisance vegetation.

Vacant buildings in Des Moines must also comply with the International Property Maintenance Code (IPMC) and the International Fire Code (IFC). IPMC Section 301.3 states: "*Vacant structures and premises thereof or vacant land shall be maintained in a clean, safe, secure and sanitary condition as provided herein so as not to cause a blighting problem or adversely affect the public health or safety.*" IFC

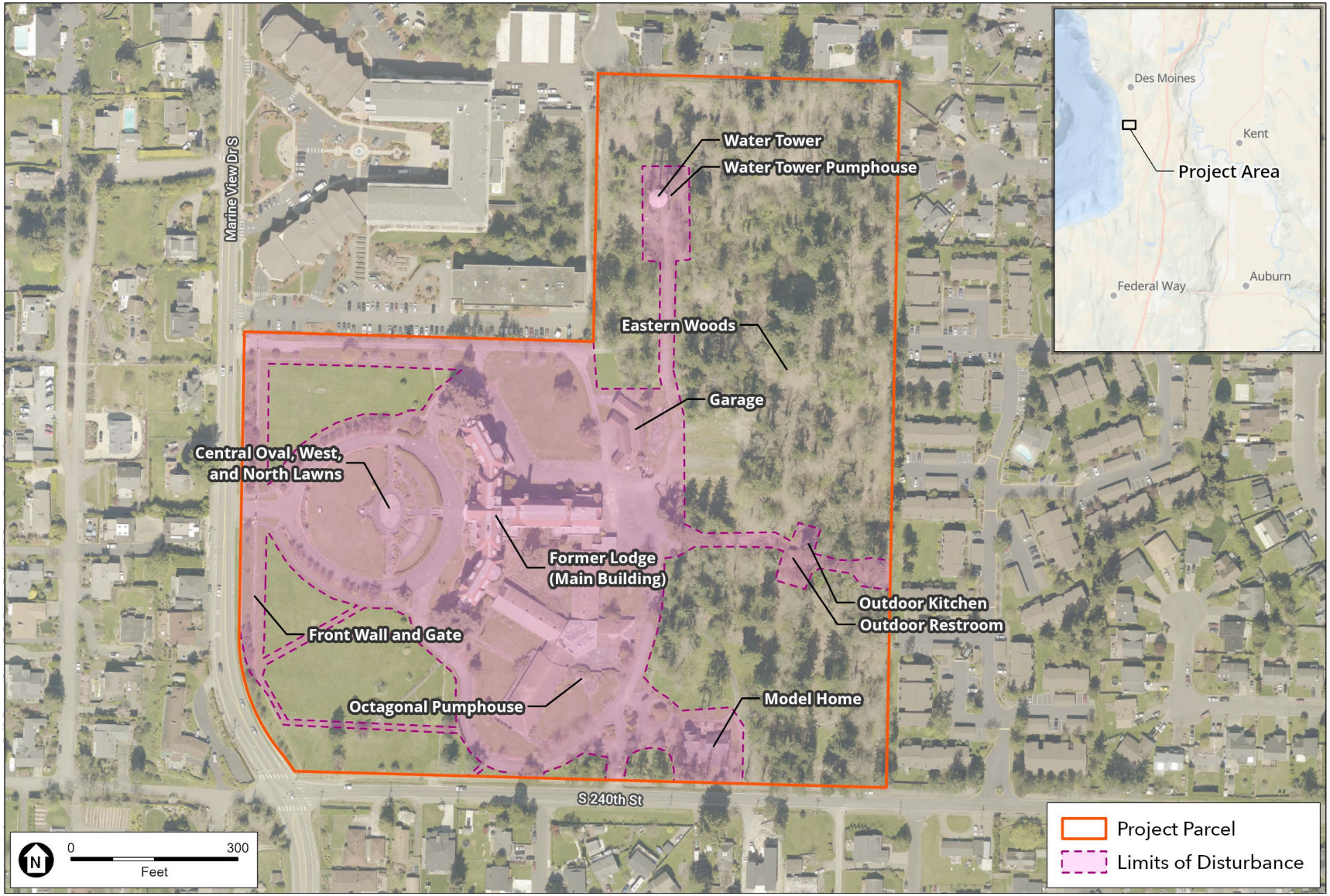
Section 311.1 states: "*Temporarily unoccupied buildings, structures, premises or portions thereof, including tenant spaces, shall be safeguarded and maintained in accordance with Sections 311.1.1 through 311.6.*"

Over time, the No Action Alternative would result in demolition through neglect. Retaining the buildings and designed landscape without stabilization will lead to their demolition—either through determination as hazardous buildings or condemnation by the City as blighted property.

There are existing building envelope condition issues at the main building that would not be repaired (OAC Services 2023). Protective and repair measures for the structures would be taken only to the extent necessary to comply with IPMC Section 301.3. Landscape vegetation and site features would be maintained only to the extent necessary to comply with IPMC Section 301.3 and the DMMC.

The No Action Alternative represents the future in the absence of the proposed project. Variables such as future development proposals and land sales are not known at the time of preparing this EIS and as such are not factors in this analysis.

The project site is within the City of Des Moines and is owned by Zenith. The project site comprises a mix of structures, buildings, and designed landscapes. These include the main building, an infirmary wing and infirmary wing addition, the water tower, water tower pump house, octagonal pump house, front wall and gate, garage, outdoor kitchen, outdoor restroom, covered patio, garden shed, storage building, sales office house, the eastern woods, the central oval, west and north lawns designed landscape, and the infirmary wing landscape (Peterson 2023, Table 4.4). See **Figure 2-1** for existing conditions.



SOURCES: Imagery: EagleView Technologies, Inc., 2021; Parcel: King County, 2022; Buildings: DAHP WISAARD

FIGURE 2-1 **Vicinity and Site Map**

2.1.2 Alternative 1: Demolition Alternative

Under Alternative 1, most of the historic resources identified in Table 3-3, Historic Resources Surveyed for this Analysis, p. 3-8, would be fully or substantially demolished. The exception to this is the potential removal of trees from the eastern woods (Ascendent 2023). Work would include demolition of the water tower (Property ID 671480), main building (Property ID 671482), octagonal pump house (Property ID 731166), water tower pump house (Property ID 731168), garage (Property ID 731169), outdoor kitchen (Property ID 731170), and the outdoor restroom (Property ID 731171). Work would substantially demolish the central oval, west, and north lawns (Property ID 731175). Work would demolish the front wall and gate (Property ID 731167), and include the potential removal of trees from the eastern woods (Property ID 731176).

Additional demolition work would include removing existing building foundations, retaining walls, landscaping (discussed below), and underground utility lines (water, sewer, and gas) within the defined work area (see Appendix B, *Demolition Plan*). The proposed demolition is not expected to disturb existing soils; the demolition would primarily be foundation/slab on grade to avoid soil disturbance. There may be minor disturbance during demolition of the basements.

The demolition work within the limits of disturbance (shown in Appendix B, *Demolition Plan*) would remove all buildings, structures, site flatwork, retaining walls, landscaping or other objects, trees, plantings and understory vegetation, and sod (Ascendent 2023). Provision is made for the retention of vegetation within the limits of disturbance where possible; however, since it is not known if retention would be possible, this analysis assumes retention would not be possible as there is no means to quantify what might be possible.

PHASING AND DURATION

The proposed demolition time period would be approximately 5 to 6 months. Phases of demolition are anticipated as:

- **Phase One** – Interior demolition and recycling of interior material (estimated 2 to 3 months).
- **Phase Two** – Exterior demolition (estimated 1 to 2 months).
- **Phase Three** – Finish work/stabilization (estimated 1 month).

The number of truck trips would vary by the day-to-day activities and volume of material ready for transport. At peak demolition, activities, up to 10 entering and 10 exiting truck trips per hour would be expected.

Hauling activities would generally be completed by 3 p.m. due to run time and hours of operation at destination facilities. The proposed demolition would be conducted consistent with all City regulations, including noise standards, hours of operation, and best management practices (BMPs) for demolition.

DEMOLITION AND EQUIPMENT

Buildings would be demolished in a stair-stepped fashion—from top to bottom and structural bay by structural bay to maintain structural stability during demolition.

The lower two stories of the main building, in addition to all other buildings to be demolished (none of which exceed one story), would be demolished using standard-size excavators (size 300–400) with attachments. Higher portions of the main building would be demolished using larger, high-reach excavators.

The water tower in the northeast area of the site would be demolished via controlled collapse. No demolition activities would involve uncontrolled collapse or implosion. The project would involve minimal use of hydraulic hammers.

DEBRIS AND ON-SITE PROCESSING

As shown in **Table 2-1**, an estimated 22,375 tons of construction debris would be generated with this alternative, which would divert 80 percent or more of all building materials and debris from landfills. Non-recyclable materials would be transported from the site to the Cedar Hills Landfill in Maple Valley via intermodal containers. All metals reclaimed on-site during demolition would be taken to Binford Metals in Kent for recycling.

TABLE 2-1 **Estimated Debris Volume and Truck Trips per Hour**

Material	Concrete	Soft Debris	Metals
Total tons	20,000	2,100	275
Truck loads	769	84	25
Truck travel hours	2100	252	80
Optimal number of trucks	12	4	1
Trucks trips/hr during peak demo activities	10 entering/10 exiting		
Tons per load	28	25	10
Destination	Maple Valley	Seattle	Kent

Concrete and masonry items generated from demolition would be transported from the site, with an option for some to be crushed on-site for reuse as fill where foundations are to be removed or elsewhere on the project site as needed if that would meet the standards of the City building division and other agencies with jurisdiction. This includes meeting geotechnical standard for structural fill and Puget Sound Clear Air Agency (PSCAA) regulations. Means and methods of concrete and masonry debris hauling would be determined by the applicant at time of construction at their discretion. However, the expected truck trips from the hauling approach for concrete and masonry debris are estimated at 769 truck trips and as low as zero truck trips for the crush and fill on-site option.

TRAFFIC/TRANSPORTATION

The demolition of structures would produce truck traffic to and from the site. As previously shown in Table 2-1, waste and recyclable debris generated are estimated to be under 900 truckloads of material from the site over the course of work for this alternative (see *Phasing and Duration*, above). At peak demolition activities, no more than 10 entering and 10 exiting truck trips per hour are expected (20 total trips). Hauling activities would generally be completed by 3 p.m. due to run times and hours of operation at destination facilities.

The largest available double-truck truck trailers would be used for this alternative. Trucks would enter and exit the site from the existing main entrance on Marine View Drive South. During high-traffic periods, or for oversized loads, trucks would enter the site from I-5 (south on Pacific Highway South, west on 240th Street) and enter the site from the south. Trucks would leave the site from the west (then north along Marine View Drive South, east on State Route 516 [SR-516] to I-5). Overall, the proposed truck routes are based on eliminating left turns across traffic. No staging or offloading would occur in the public right-of-way, and no lane or traffic closures are expected.

Additional information on Alternative 1 is provided in Chapter 5, *Construction Impacts*.

2.1.3 Alternative 2: Historic Preservation and Potential Future Adaptive Reuse Alternative

Alternative 2 assumes that Zenith would mothball the existing structures on-site (City of Des Moines 2022). Mothballing would include the main building (Property ID 671482); water tower (Property ID 671480); octagonal pump house (Property ID 731166); water tower pump house (Property ID 731168); garage (Property ID 731169); outdoor kitchen (Property ID 731170); outdoor restroom (Property ID 731171); structures associated with the central oval, west, and north lawns (Property ID 731175); the front wall and gate (Property ID 731167); and the eastern woods (Property ID 731176).

Mothballing is when a building is closed up temporarily to protect it from weather and secure it from vandalism. The mothballing would follow guidance in the National Park Service's Preservation Brief 31 "Mothballing Historic Buildings" (Park 1993). The intent would be to protect the historic resources from natural forces and human-driven forces for a period of 15 years until a use can be identified for the Property that provides an opportunity to activate and integrate the historic resources and designed landscape with that new use.

Mothballing includes the following basic steps and occurs when all other options for identifying productive use(s) and funds for rehabilitation have been exhausted:

- Preparing detailed documentation of the historic resources.
- Stabilizing to prevent future deterioration while the historic resources are not being used.
- Securing the historic resources systems.
- Creating and implementing an ongoing maintenance and monitoring program to ensure protection of the historic resources.

The detailed documentation of the historic resources prepared as technical reports for this Draft EIS would guide mothballing (Peterson 2023; OAC Services 2023).

Additional information on Alternative 2 is found in Chapter 3, *Cultural Resources: Historic Preservation*.

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CHAPTER 3 CULTURAL RESOURCES: HISTORIC PRESERVATION

3.1 Introduction

This chapter describes the affected environment in the context of historic preservation of cultural resources, analyzes the alternatives for potential impacts on historic cultural resources associated with the proposal, and proposes potential mitigation measures. As such, for the purposes of this chapter, "cultural resources" refers to historic built environment resources. For an analysis focusing on archaeological resources, see Chapter 4, *Cultural Resources: Archaeological*.

3.2 Affected Environment

Information on the affected environment was obtained through the following technical reports. Historic built environment resource identification, evaluation of significance, and understanding of proposed work for the impact analysis relied on the following:

- Department of Archaeology and Historic Preservation's (DAHP's) Washington Information System for Architectural and Archaeological Records Data (WISAARD) historic property inventory forms for DAHP project number 2023-07-04130.
- **Appendix D**, *Masonic Home of Washington Historic Report* (Peterson 2023).
- *Preliminary Work Plans, Work Plan & Environmental Considerations Related to Structure Demolition* (Ascendent LLC 2023).
- *Zenith Properties LLC Des Moines Masonic Lodge Economic Feasibility Analysis*, including attachments A, B, and C (ECONorthwest 2023).

As part of preparing this report, Painter Preservation's Diana Painter and Northwest Vernacular, Inc.'s Spencer Howard attended a site visit on February 28, 2023, for disciplines participating in developing this report. This site visit provided access to the grounds, building exteriors, and the interior of the main lodge.

3.2.1 Regulatory Context

RESOURCE DESCRIPTION

A cultural resource is defined as any district, site, building, structure, or object that is already included in, determined to be, recommended as, or may be eligible for listing in or designation as or eligible for designation in a historic register. Historic registers include the National Register, the Washington Heritage Register, City of Des Moines Landmarks, or City of Des Moines Property of Local Significance unless specifically noted. Historic register eligibility evaluation uses the National Register criteria (36 Code of Federal Regulations [CFR] Section 60.4) on the basis that any National Register eligible resource would also be eligible for all the preceding listed registers unless specifically noted.

RELEVANT LAWS AND POLICIES

Cultural resources within the project area are protected by various federal, state, county, and City laws, plans, and policies (**Table 3-1**).

The project area sits entirely within the city limits of Des Moines within King County. The project is not subject to King County permitting. The project is not a state-funded acquisition or construction project and is not subject to the Shoreline Management Act (RCW 90.58). The project is not subject to federal permitting, funding, or licensing that would create a federal nexus.

TABLE 3-1 Laws and Policies

Regulatory Law or Policy	Lead Agency	Description
City of Des Moines Protection of Historic and Archaeological Resources (Chapter 18.215 Des Moines Municipal Code [DMMC])	City of Des Moines	This chapter creates a mechanism for the designation of Des Moines Landmarks through the adoption of Chapter 20.62 of the King County Code. This chapter designates and establishes criteria and a process for the designation of additional historic or archaeological properties of local significance (properties of local significance), and a mechanism for owners to request removal of the properties of local significance designation from properties. For State Environmental Policy Act (SEPA) Checklist question 13. "Historic and Cultural Preservation" under question (a.), the Des Moines Landmarks and Properties of Local Significance, inclusive of those in the *Historic Properties Survey: City of Des Moines* (per DMMC 18.215.060), are local preservation registers.
Interlocal Agreement for Landmark Services (March 17, 2005)	City of Des Moines	An agreement between King County and the City of Des Moines relating to Landmark designation and protection services.
National Historic Preservation Act (NHPA) of 1966 (Title 54 United State Code [USC]); Section 106 of the NHPA (36 Code of Federal Regulations [CFR] part 800)	DAHP	The NHPA was approved on October 15, 1966, for the management and preservation of historical and archaeological sites. Under this act, the National Register, National Historic Landmarks List, State Historic Preservation Offices (SHPO), and Tribal Historic Preservation Offices (THPO) were created. Washington State's SHPO is the Department of Archaeology and Historic Preservation (DAHP), which is the state agency that administers NHPA compliance in Washington and provides formal determinations of National Register eligibility. The procedures for implementing the NHPA are detailed in the Protection of Historic Places regulations (36 CFR Part 800). For SEPA Checklist question 13. "Historic and Cultural Preservation" under question (a.) the National Register is a national preservation register.
SEPA (Chapter 16.05 DMMC; Washington Administrative Code [WAC] 197-11-330)	City of Des Moines	This chapter contains the City's SEPA procedures and policies and is used in conjunction with the SEPA rules, Chapter 197-11 WAC, and Chapter 43.21C of the Revised Code of Washington (RCW). SEPA requires government decision makers to consider the likely environmental consequences of a proposal and require mitigation measures. This includes impacts on cultural resources and establishes the Department of Archaeology and Historic Preservation (DAHP) as the state agency with expertise in this area.
Washington Heritage Register (Senate Bill 363; Revised Code of Washington [RCW] 27.34.200; WAC 25-12)	DAHP	Created in the March 19, 1971, Executive Session of the State of Washington Advisory Council on Historic Preservation and maintained by the DAHP. For SEPA Checklist question 13. "Historic and Cultural Preservation" under question (a.) this is a state preservation register.

City of Des Moines Protection of Historic and Archaeological Resources

The City of Des Moines is a Certified Local Government through an interlocal agreement with King County and has two cultural resources registers, Des Moines Landmarks and the Properties of Local Significance:

- **Des Moines Landmarks**, inclusive Community Landmarks, are designated within the city limits by the King County Landmarks Commission, with the addition of a special member acting as the City of Des Moines Landmarks Commission per section 2.A. of the 2005 interlocal agreement. King County Code (KCC) 20.62.040 and Des Moines Municipal Code (DMMC) 18.215.110 identify the applicable designation criteria. This KCC section is within Chapter 20.62 KCC, which is adopted by reference in DMMC 18.215.110 and 18.215.120. Per DMMC 18.215.110(3) City Council approval is required for a resource to proceed through the nomination procedure of KCC 20.62.050.
- **Properties of Local Significance** are designated within the city limits by City Council based on designation criteria in DMMC 18.215.050. Resources in the April 1995 document titled *Historic Properties Survey: City of Des Moines* are designated as a historic or archaeological property of local significance, per DMMC 18.215.060, upon the determination that resources identified within this document meet one or more criteria set forth in DMMC 18.215.050. Property owners, under DMMC 18.215.070(4), may remove their properties from designation by submitting a written request to the Planning, Building, and Public Works Director.

Resources eligible for Des Moines Landmark designation, per KCC 20.62.040, must be at least 40 years old or have documented exceptional significance. They must retain integrity of location, design, setting, materials, workmanship, association, and feeling. They must have documented historical significance that is generally established based on meeting at least one of the five criteria of significance, or meeting criterion B for designation as a Community Landmark.

Washington Heritage Register

Resources eligible for listing in the Washington Heritage Register must be at least 50 years old or have documented exceptional significance. They must retain integrity of location, design, setting, materials, workmanship, association, and feeling. They must have documented historical significance that is generally established based on meeting at least one of the nine areas of significance listed in Section F of the Washington Heritage Register application (DAHP 2023).

National Register of Historic Places

Resources eligible for listing in the National Register of Historic Places (National Register) must be at least 50 years old or have documented exceptional significance. They must retain integrity of location, design, setting, materials, workmanship, association, and feeling. They must have documented historical significance that is generally established based on meeting at least one of the four National Register Criteria for Evaluation (NPS 1995):

- **Criterion A.** Associated with one or more events that have contributed significantly to the broad pattern of our history.
- **Criterion B.** Associated with the lives of persons significant in our past.
- **Criterion C.** Embody the distinctive characteristics of a type, period, or method of construction; or represent the work of a master; or possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
- **Criterion D.** Have yielded, or may be likely to yield, information important in prehistory or history.

3.2.2 Historic Resources

An eligible historic district with 10 eligible contributing resources were identified within the project area. Three of the eligible contributing resources are also individually National Register eligible.

The project area consists of the existing 30.3-acre King County tax parcel (1722049023) located at 23660 Marine View Drive South (the Property). The project area is bounded by South 240th Street (south), Marine View Drive South (west), the Judson Park retirement facility (north and west), and single- and multiple-family residential development (north and east).

The eligible historic district is listed and identified by name (Masonic Home of Washington Historic District) in **Table 3-2** and is shown in **Figure 3-1**. The proposed boundary of the eligible historic district includes the full project area. Historic resources surveyed for this analysis are listed in **Table 3-3** and depicted in Figure 3-1 and are identified by Property ID.

Table 3-2 identifies the eligible historic district within the project area, and the registers for which it is recommended as eligible for listing and designation. The No Action Alternative and one or both of the action alternatives are anticipated to impact this eligible historic district. There are no listed or designated historic districts within, overlapping, or adjacent to the project area.

TABLE 3-2 **Historic District**

Historic Name	Register Listing
Masonic Home of Washington Historic District	Recommended as National Register, Washington Heritage Register, Des Moines Landmarks, and Property of Local Significance eligible

The eligible Masonic Home of Washington Historic District contains the designed landscape and buildings of the former Masonic Home. It is eligible for listing in the National Register for its statewide significance under National Register Criterion A in the area of Social History and Criterion C in the area of Architecture. The district is also eligible for Washington Heritage Register listing, and designation as a Des Moines Landmark and a Property of Local Significance. The district reflects the development patterns of the Masonic Home during its period of significance. The recommended period of significance starts in 1926 with construction of the water tower, the first structure built on the site as part of the Masonic Home, and ends in 1937 with construction of the garage, outdoor kitchen, and outdoor restroom. The 10 contributing resources in the district demonstrate its role as the sole retirement home serving all of the state's Masonic chapters (Peterson 2023).

Table 3-3 identifies historic resources within the project area surveyed as part of this analysis (Peterson 2023). One or both of the action alternatives are anticipated to impact these historic resources. The survey recorded historic property inventory forms at the reconnaissance level in WISAARD under DAHP project number 2023-07-04130. There are no individually listed or designated resources within or adjacent to the project area. The Property ID used to identify each historic resource is a unique identification number generated by WISAARD.

Legend

- Project area and eligible Masonic Home of Washington Historic District boundary
- Historic resources identified within the project area (Labeled by name and property ID)
- Historic resources (linear) identified within the project area

SOURCE: King County satellite base image, 2021

FIGURE 3-1 **Historic District**

TABLE 3-3 **Historic Resources Surveyed for this Analysis**

Property ID	Historic Name	Register Listing (Individual Level)	Historic District Status	Year Built
671480	Masonic Home of Washington – Water Tower	Recommended as individually National Register, Washington Heritage Register, Des Moines Landmark, and Property of Local Significance eligible	Recommended as contributing to the eligible Masonic Home of Washington Historic District that is National Register, Washington Heritage Register, and Des Moines Landmark, and Property of Local Significance eligible	1926
671482	Masonic Home of Washington – Main Building	Recommended as individually National Register, Washington Heritage Register, Des Moines Landmark, and Property of Local Significance eligible	Recommended as contributing to the eligible Masonic Home of Washington Historic District that is National Register, Washington Heritage Register, and Des Moines Landmark, and Property of Local Significance eligible	1927
731166	Masonic Home of Washington – Octagonal Pump House	Not individually eligible	Recommended as contributing to the eligible Masonic Home of Washington Historic District that is National Register, Washington Heritage Register, and Des Moines Landmark, and Property of Local Significance eligible	1926
731167	Masonic Home of Washington – Front Wall and Gate	Not individually eligible	Recommended as contributing to the eligible Masonic Home of Washington Historic District that is National Register, Washington Heritage Register, and Des Moines Landmark, and Property of Local Significance eligible	1927
731168	Masonic Home of Washington – Water Tower Pump House	Not individually eligible	Recommended as contributing to the eligible Masonic Home of Washington Historic District that is National Register, Washington Heritage Register, and Des Moines Landmark, and Property of Local Significance eligible	1926
731169	Masonic Home of Washington – Garage	Not individually eligible	Recommended as contributing to the eligible Masonic Home of Washington Historic District that is National Register, Washington Heritage Register, and Des Moines Landmark, and Property of Local Significance eligible	1937
731170	Masonic Home of Washington – Outdoor Kitchen	Not individually eligible	Recommended as contributing to the eligible Masonic Home of Washington Historic District that is National Register, Washington Heritage Register, and Des Moines Landmark, and Property of Local Significance eligible	1937
731171	Masonic Home of Washington – Outdoor Restroom	Not individually eligible	Recommended as contributing to the eligible Masonic Home of Washington Historic District that is National Register, Washington Heritage Register, and Des Moines Landmark, and Property of Local Significance eligible	1937
731175	Masonic Home of Washington – Central Oval, West, and North Lawns	Recommended as individually National Register, Washington Heritage Register, Des Moines Landmark, and Property of Local Significance eligible	Recommended as contributing to the eligible Masonic Home of Washington Historic District that is National Register, Washington Heritage Register, and Des Moines Landmark, and Property of Local Significance eligible	1926–1927
731176	Masonic Home of Washington – Eastern Woods	Not individually eligible	Recommended as contributing to the eligible Masonic Home of Washington Historic District that is National Register, Washington Heritage Register, and Des Moines Landmark, and Property of Local Significance eligible	1927

Individual historic resources are summarized below in the same order as they are listed in the preceding table. Each of these historic resources, despite varying levels of alterations, retain sufficient integrity to convey their architectural and historical associations and, thus, contribute to the eligible historic district (Peterson 2023).

Masonic Home of Washington – Water Tower (Property ID 671480) was built in 1926 as part of a system to provide water for residents. It was determined National Register eligible by DAHP in 2013 at the local level of significance under Criterion C for the area of significance of Architecture, the recommended area of significance is Engineering. The tower remains an excellent example of an early 20th century water tower and contributes to the National Register eligible Masonic Home of Washington Historic District as a component of the early physical development of the Masonic Home (Peterson 2023).

The riveted steel tower was manufactured by the Chicago Bridge & Iron Company, the leading manufacturer of elevated water storage tanks in the country at the time. The tower's four 136-foot-tall, latticed steel legs rise from concrete footings, are cross braced with cables and horizontal support struts, and support a 30-foot-diameter, 20-foot-tall steel water tank with a perimeter steel catwalk and railing (Peterson 2023).

Character-defining features include: the footprint and massing; lattice steel legs and cross bracing; the steel water tank; steel catwalk and handrail; and the central riser pipe and ladders.

Masonic Home of Washington – Main Building (Property ID 671482) was built in 1927 and provided the housing and services for residents. It was determined National Register eligible by DAHP in 2014 at the state level of significance under Criterion C for the area of significance of Architecture as an excellent example of Chateauesque style. The building and associated landscape are also eligible under Criterion A, at the state level, for the area of significance of Social History due to its association with the Freemasons, an important fraternal order in the state, and their mission to provide dignity in aging to their fraternal brethren and families; and because it was built to be the sole retirement home serving all of the Masonic chapters in Washington State. The main building also contributes to the National Register eligible Masonic Home of Washington Historic District as a component of the early physical development of the Masonic Home. The 1966 and 1987 additions were built outside of the period of significance (1926–1937) and do not reflect the characteristics of the Chateauesque style, but their siting, scale, and massing do not detract from the character-defining features of the original building (Peterson 2023).

The prominent Tacoma architecture firm of Heath, Gove & Bell designed the four-and-a-half-story Chateauesque style building, placing it prominently at the brow of the hill, with views of Puget Sound to the west. Building massing consists of a central block with side and rear wings. Exterior finishes for the reinforced concrete structure are textured stucco with red rug-faced brick and gray terra-cotta trim elements at story transitions, outer building corners, and window and door openings. The deeply recessed grid of window openings contains replacement bronzed aluminum sash. Steeply pitched hipped roofs with red clay tile roofing shelter interior spaces with some built-up membrane roofed flat roof locations. Foundation plantings occupy 10- to 15-foot-wide planting beds along the base of the foundation with concrete edging blocks. A prominent recessed entry porch and steel frame marquee mark the main entrance. The ornate marquee includes copper sheet metal ornamentation and wrought iron pendant lanterns with amber glass. The recessed entrance includes Wilkeson sandstone steps, brick piers with decorative tile and terra-cotta detailing, terrazzo floor, and bronze ceiling fixtures. Oak double doors with glazed panels, transoms, and bronze grilles open to the interior (Peterson 2023).

Interior spaces are subdivided by plaster finished hollow clay tile walls. Terrazzo is the main flooring within common spaces. Interior layout includes double-loaded north-to-south corridors with residential units, in addition to multiple specialty common spaces. These include the entry vestibule, main foyer, ramp, waiting room, solariums, library, sitting room, dining room, and auditorium and chapel all with decorative finishes. Stained-glass skylights provide additional day lighting to select spaces. The central switchback ramp in addition to stairways provides access between floors (Peterson 2023).

Character-defining features include: the footprint and massing; structure; exterior and interior finishes; roof form and materials; window openings and trim; foundation plantings, including the six mature Cedar of Lebanon trees at the ends of the north and south wings; entrances; and interior layout, including common spaces, corridors, ramp, stairways, and residential units. Noncontributing additions include the 1966 Naramore, Bain, Brady & Johanson (NBBJ)-designed two-story infirmary wing and the 1987 Harold E. Dalke AIA and Associates–designed infirmary wing addition (Peterson 2023).

Masonic Home of Washington – Octagonal Pump House (Property ID 731166) was built in 1926 as part of a system to provide water for residents and as a freestanding decorative landscape feature. The pump house contributes to the eligible Masonic Home of Washington Historic District as a component of the early physical development of the Masonic Home (Peterson 2023).

Design of the octagonal building with Classical architectural details is attributed to architects Heath, Gove & Bell. Stucco, with brick at the entablature, is the exterior finish for the one-story concrete structure. The building has multiple light wood sash windows and a front door all set in round ached openings. The pyramidal roof has replacement asphalt composite roofing (Peterson 2023).

Character-defining features include: the footprint and massing; structure and exterior finishes; architectural detailing; roof form; windows and trim; and the entrance.

Masonic Home of Washington – Front Wall and Gate (Property ID 731167) was built in 1927 as part of the original designed landscape for the Masonic Home. The front wall and gate contribute to the eligible Masonic Home of Washington Historic District as a component of the early physical development of the Masonic Home (Peterson 2023).

Designed by architects Heath, Gove & Bell, the front retaining wall and central gate function as the formal front edge along Marine View Drive South and provide access to the Masonic Home Property. Stucco is the exterior finish for the 550-foot-long concrete wall and coping. Piers along the length of the wall on 20-foot intervals rise slightly above the 3- to 4-foot-tall wall. Thirteen-foot-tall piers with red brick exterior finish and cast stone quoins, topped with pyramidal concrete caps and light fixtures, support the gate. The gate consists of a wide opening across the driveway. Curving, flared wall sections slope down from the gate piers to the wall sections flanking the personnel gates. At each personnel gate, original wrought iron side sections partially extend into the sidewalk and formerly supported wrought iron gates at these locations (Peterson 2023).

Character-defining features include the footprint and massing, structure and exterior finishes, architectural detailing at the wall and piers, light fixtures, and wrought iron side sections.

Masonic Home of Washington – Water Tower Pump House (Property ID 731168) was built in 1926 as part of a system to provide water for residents. The pump house contributes to the eligible Masonic Home of Washington Historic District as a component of the early physical development of the Masonic Home (Peterson 2023).

Design of the utilitarian building is attributed to architects Heath, Gove & Bell. The concrete structure is painted. The elliptical arched concrete roof has slight eave and gable overhangs and is finished with stucco. A personnel doorway provides interior access.

Character-defining features include: the footprint and massing; structure and exterior finishes; and curved roof form and overhang.

Masonic Home of Washington – Garage (Property ID 731169) was built in 1937 to provide parking for the Masonic Home's staff. The garage contributes to the eligible Masonic Home of Washington Historic District as a component of the early physical development of the Masonic Home (Peterson 2023).

Designed by architects Mock & Morrison, the building has a C-shaped plan with angled, gable-front wings. A concrete foundation supports the wood frame structure with textured stucco as the exterior finish. The steeply pitched side gable roof is finished with asphalt composition shingles. Window openings at the gable ends are round arched with multiple light wood sashes. The four rear façade windows are wood sashes, with multiple lights. The eight garage doors have replacement garage doors. Two personnel doors on the façade provide access (Peterson 2023).

Character-defining features include: the footprint and massing; structure and exterior finishes; roof form; windows; garage door openings; and personnel doorways.

Masonic Home of Washington – Outdoor Kitchen (Property ID 731170) was built in 1937 to support the gathering of Masonic Home residents and visitors in the part of the eastern woods used as the picnic area. The outdoor kitchen contributes to the eligible Masonic Home of Washington Historic District as a component of the early physical development of the Masonic Home (Peterson 2023).

The one-story building has a rectangular plan. Perimeter wood posts support the asphalt shingle-clad pyramidal roof with exposed rafter ends. Low clapboard-clad walls extend between the wood posts, with an entrance façade east facade. The kitchen features a concrete floor with a central, round brick barbecue pit with a conical sheet metal hood suspended by chains and connected to the central sheet metal roof vent. Built in cabinets and wood shelves extend along the back, west wall (Peterson 2023).

Character-defining features include: the footprint and massing; structure and exterior finishes; roof form; open sides; brick barbecue pit and metal vent hood; and built-in wood cabinets and shelves.

Masonic Home of Washington – Outdoor Restroom (Property ID 731171) was built in 1937 to support the gathering of Masonic Home residents and visitors in the part of the eastern woods used as the picnic area. The outdoor restroom contributes to the eligible Masonic Home of Washington Historic District as a component of the early physical development of the Masonic Home (Peterson 2023).

The one-story building has a rectangular plan. A wood frame structure supports the gable roof with exposed rafter ends and asphalt composition shingles. Siding consists of clapboard and wood trim. Five-panel wood doors at the gable ends provide restroom access with windows on the side facades. Interior finishes include painted shiplap walls and ceilings, wood-plank stall partitions, and wood window casings and stools (Peterson 2023).

Character-defining features include: the footprint and massing; structure, exterior and interior finishes; windows and trim, entrance doors and trim; roof form; and stall partitions.

Masonic Home of Washington – Central Oval, West, and North Lawns (Property ID 731175) were built in 1926 as part of the original designed landscape for the Masonic Home. The central oval, west, and north lawns contribute to the eligible Masonic Home of Washington Historic District as a component of the early physical development of the Masonic Home (Peterson 2023).

The central oval extends between the front gates and the main building and is flanked by the west lawn. The overall area slopes downward to the west. The north lawn is north of the main building.

The oval-shaped vehicular drive defines the overall layout and encloses the central lawn and formal garden of the central oval. A planting strip with ornamental flowering trees and a concrete walkway extend along the outer side of the drive between the central oval and west lawn. The central lawn is edged with low shrubs, perennials, and concrete edging. The formal garden consists of a central, north to south oriented, oval-shaped concrete pool. A walkway extends around the pool. East of the pool, a red brick retaining wall with recessed seating areas transitions to the planting beds at the east end of the formal garden. A central wrought iron handrail leads from the planting beds through a boxwood hedge to the front entrance of the main building (Peterson 2023).

The west and north lawns are interspersed with trees and ornamental shrubs (Peterson 2023).

Character-defining features include: the footprint; spatial organization; topography; circulation including the paved drive, walkways, steps, wrought iron railing, and curbing; oval pool water feature; vegetation including lawn, ornamental and specimen trees and shrubs, and perennials; and structures and site furnishings including edging, retaining wall, light standards, and seating.

Masonic Home of Washington – Eastern Woods (Property ID 731176) is part of the 1926 Property and includes the part of the woods used as the picnic area to support the gathering of Masonic Home residents and

visitors. The eastern woods contribute to the eligible Masonic Home of Washington Historic District as a component of the early physical development of the Masonic Home (Peterson 2023).

Topography within the area is generally level. Vegetation includes a mix of native second-growth deciduous and evergreen trees primarily composed of Douglas fir, alder, and bigleaf maple. The understory includes vine maple, dogwood, hazelnut, and native ferns, blackberry, and English ivy, salal, and cherry laurel. Added asphalt walkways wind through the area. The picnic area is east of the main building and includes an open glade with grass along with an added paved area around the added covered patio (Peterson 2023).

Character-defining features include native trees and understory vegetation; and picnic area including glade, outdoor restroom, and outdoor kitchen.

3.2.3 Historic Development Context

The following Historic Development Context briefly describes (1) the general history of the project area; (2) the history of the Masonic Order; (3) Masonic Homes in the Puget Sound area, and other fraternal homes in Washington; and (4) the historic development of the original Masonic Home in Puyallup and this Masonic Home in Zenith. It also describes the demographics of the residents in the home in Zenith. Profiles are included of the original architect, the subsequent architect of the 1966 wing, the original builder, and the original landscape architect. These discussions are adapted from the Masonic Home of Washington Historic Report dated June 29, 2023 (Peterson 2023), unless otherwise noted.

HISTORY OF DES MOINES AND ZENITH

Des Moines first developed as a rural logging and farming community along the hillsides and shores of Puget Sound, approximately halfway (16 miles) between Seattle and Tacoma. Initial homesteading in the area by Euro-Americans began in the mid-1860s, but very little development occurred until decades later, in part because most transportation was by boat on Puget Sound (HistoryLink 1999).

In 1889, local property owners John W. Kleeb and Orin Watts Barlow platted the initial townsite, which they named Des Moines, after the Iowa city of the same. The first businesses established were lumber and shingle mills, built to process trees logged from the area. A wharf was built to accommodate steamers and “mosquito fleet” ferries that connected residents to more established towns around Puget Sound. Within a year, Des Moines had a population of 216 and already had a few hotels, a chair factory, a tin factory, a boat yard, a school, and

churches. However, the town grew slowly over the next three decades, growing to only 751 residents by 1920 (HistoryLink 2021).

Zenith, situated a mile directly south of the Des Moines townsite plat, consisted of scattered homesteads with orchards and small farms growing primarily berries and raising chickens. A Zenith post office was established in 1906 across the street from the subject site. At the west end of 240th Street, the southern boundary of the subject site, was the Zenith dock, built at about the same time (Kennedy and Schmidt 1989). In 1907, a florist business and greenhouses were established in Zenith by early settler Max Elsner on what is now the subject site. Today, his company survives two blocks to the north, as the Zenith Holland Gardens, the oldest continuously operating business in the area (Kennedy and Schmidt 1989).

The 1910s and 1920s brought increased transportation links to the Des Moines/Zenith area, including the first ferry to Vashon Island, and the Seattle-Tacoma interurban trolley (Kennedy and Schmidt 1989). Easy access was not ensured, however, until the widespread popularity of the automobile brought about more paved roads, which made a significant impact on population growth. Paving the “Brick Highway” (Des Moines Memorial Drive) was completed in 1916. Weekend sightseers and drivers coming from larger cities and seeking the countryside discovered the area’s views and beaches, resulting in the growth of small hotels along the waterfront south of Des Moines. Visitors also built summer homes or year-round homes on the relatively inexpensive land.

Between 1926 and 1927, the Washington Masonic Home was constructed in Zenith, across the street from the post office and uphill from the Zenith pier. The sizeable structure, fronted by a formal oval drive and surrounded by expansive lawns, was by far the most imposing institution in the vicinity.

By 1930, the Des Moines population was almost 2,000. Completion of Pacific Highway South (State Route 99) in the mid-1930s increased accessibility to the area and, during World War II, defense plants south of Seattle attracted a sizable number of new residents to the area. The trend continued in the postwar period.

In 1959, as an effort to prevent annexation by the nearby municipality of Kent, the residents of Des Moines voted to incorporate. As the area continued to grow, adjacent communities were added to Des Moines through a series of annexations. Zenith by this time was seen as a neighborhood district of Des Moines, and in 1982, it was annexed into its city limits. Another major annexation was that of the campus of Highline College, which occurred in the 1980s. In addition to the subject Property, Des Moines hosts two other large retirement homes: Wesley

Homes Retirement Community (ca. 1953, 815 South 216th Street) and Judson Park (ca. 1966, 2300 Marine View Drive South), both founded by religious groups in the mid-20th century.

Today, Des Moines city boundaries extend approximately seven miles from Normandy Park on the north to Federal Way on the south, and one-and-one-half miles from Puget Sound to Highway 99 on the east, with Zenith and the subject site near the geographic center. Federal census data estimates the 2022 Des Moines population as 32,408 (Census 2022).

HISTORY OF THE MASONIC ORDER AND MASONIC HOMES

History of the Masonic Order

The Masonic Home of Washington was established by the Freemasons, a fraternal order with roots in Europe and a long history in the United States. The Washington State body is led by the Most Worshipful Grand Lodge of the Free and Accepted Masons (also styled as the M. W. Grand Lodge F. & A. M.), State of Washington.

Freemasonry was founded officially in 1717 in London, England, as the "Ancient Free and Accepted Masons." The Masons are reportedly the oldest fraternity in the western world, with the organization purportedly growing out of medieval stone mason guilds. In the late 18th century, the organization began admitting non-Masons as honorary members. Freemasonry in England was open only to men and was limited to white men of European descent. Freemasonry came to the United States soon after its founding; there were multiple lodges in Pennsylvania as early as 1817.[1]

Masons cite their specific values as a commitment to the common good, and "the commitment between the Brotherhood … a bond of true friendship … a safe circle of trustworthy friends," and commitment to "Ethics, Morality and Integrity" (Grand Lodge of Washington, n.d.). In addition, Masonic Lodges have traditionally supported charities for children and youth, education, and outreach to families and the elderly.

Freemasonry often served as a model for other fraternal orders that were created in North America in the 19th century, which borrowed general ideas of rituals, ceremonial garb, rules, organization, values, and purpose. While most fraternal orders had membership limited to men,

[1] Sources suggest that the model of the public school system may have derived from early American Freemasonry, and that the American Constitution was influenced by Masons, as George Washington was one of the organizations' most famous members.

typically white, there were often women's auxiliaries for members' wives (Peterson 2023).

Fraternal groups became popular in the United States partly as a social and networking outlet, but they also provided economic security to members by covering the costs of member burials and offering insurance to widows and orphans of deceased members, often at relatively low rates, at a time before most public or private social security programs.

Some fraternal orders established homes for their aged members, like the subject building, or hospitals, orphanages, or cemeteries for the benefit of their members. While some fraternal organizations were limited to members of specific religions, others, such as the Veterans of Foreign Wars, were devoted to veterans. Creation of new fraternal organizations slowed in the 1930s, in part due to economic conditions. However, most organizations' membership did not significantly decline until the late 20th century (BOLA 2019).

Freemasons were one of numerous social fraternal orders with a national profile active in Washington State in the late 19th and 20th centuries. Such groups included the Independent Order of Old Fellows, Woodmen of the World, Knights of Pythias, the Benevolent and Protective Order of Elks, and many others.

Freemasonry appeared in the Pacific Northwest during the mid-19th century. Early settlers in Oregon Territory (which at that time included the land that is now Washington) included seven Masonic members who organized their first meeting in 1846 to obtain a charter for a lodge in Oregon City. The result was Multnomah Lodge No. 84, established in 1848, which is the oldest Masonic Lodge on the West Coast. The first Washington Territory Lodge was chartered in Olympia in 1853, the same year that the Washington Territory was carved out of the Oregon Territory. The Grand Mound Lodge and the Grand Lodge of Washington Territory followed. Membership then numbered 112 Master Masons out of the territorial population of 9,000. The first Lodge in King County, Washington—St. John's No. 9—was established in Seattle in 1860 (Grand Lodge of Washington, n.d.).

Fraternal groups like the Masons were particularly popular during the period of 1880–1920, when the United States experienced a surge of immigration from Europe, providing a vehicle for social integration (Schmidt and Babchuk 1980). In 1907, there were 4,900 Freemasons in Washington, the third most popular society of its type in the state, after the Odd Fellows with 7,400 members and the Ancient Order of United

Workmen with 6,000 members, and on par with the fourth-largest group, the Knights of Pythias with 4,400 members (Curl 2002).[2]

Several symbols that occur in Freemasonry are associated with architecture or geometry, and these often appear as decorative features on Masonic lodges and buildings. The most common Masonic symbol is the square and compass overlaid with a letter "G" in the center. Other symbols include the trowel; the builder's level and plumb line; a mallet and chisel; the three Classical architectural orders represented by Ionic, Corinthian, and Doric columns; the beehive; the hourglass; and others (Morris 2013). All of these symbols appear on decorative tiles in the entry porch of the Masonic Home of Washington.

Masonic Homes

Freemasons have a long tradition of philanthropy; in the United States, lodges established charity funds in the early 1700s as part of member dues, primarily to assist the lodge's own members. However, because state grand lodges dominate the organizational structure of American Freemasonry, institutional Masonic philanthropies were generally focused within a state, rather than organized at a national scale.

The need for assistance to the membership particularly intensified after the Civil War. The Grand Lodge of Kentucky became the first Masonic group in the nation to establish a statewide charity, the Masonic Widows and Orphans Home and Infirmary, in 1867. They were followed by a similar institution established by the North Carolina Grand Lodge in 1872 (Morris 2013). By the turn of the 20th century, Masonic Grand Lodges in some states had established orphanages, homes for the aged, hospitals, and even colleges, although some of these institutions did not last more than a few decades.

An example is the Masonic Home of New York, established by the New York Grand Lodge in 1893 in Utica, New York, which included a 200-acre working farm that supplied all foodstuffs for those who lived on campus, as well as products that could be sold to generate additional revenue. Within 30 years, it had expanded to include a building for 360 adults, a hospital, and several dormitories for children. Additional revenue for the Masonic Home of New York came from a large Masonic property in the heart of Manhattan with office space leased to tenants, built specifically to support the Masonic Home of New York. The Utica facility remains in operation at present (Moore 2006).

[2] The states with the largest Masonic membership in 1907 were centered in the more populous East and Midwest—the largest by far was New York, with over 88,000 members. Next in line with 40,000 to 49,000 members were Illinois and Pennsylvania, then Ohio, Michigan, Massachusetts, and Missouri with 30,000 to 39,000 members.

In the West, only the Masonic Grand Lodges of California, Montana, Washington, and Oregon established retirement homes to serve their states' aging membership.

California's first Masonic Home was built in 1898 in Union City overlooking San Francisco Bay to care for widows and orphans; a second facility opened in 1909 east of Los Angeles. The Union City Home currently serves 300 residents.

The Montana Masonic Home was established on 500 acres of farmland near Helena, Montana, in 1907. The facility operates at present, housing 50 residents (Masonic Home of Montana 2023).

The Masonic Home of Washington was established in Puyallup in 1912 and moved to the subject building in Zenith in 1927.

The Oregon facility was established in 1922 in Forest Grove, a small farming town 25 miles west of Portland. Known as the Masonic and Eastern Star Home, the rest home operated until 1999, when the last residents were transferred to a new building. The old home was sold and now operates as McMenamin's Grand Lodge Hotel (McMenamins 2023).[3]

MASONIC HOMES IN PUGET SOUND AND FRATERNAL HOMES IN WASHINGTON STATE

Early Homes for the Aged in the Puget Sound Region

The nation's earliest federal social security pensions developed during and after the Civil War, when wartime conditions suddenly created hundreds of thousands of widows, orphans, and disabled veterans. In 1894, military pensions accounted for 37 percent of the entire federal budget. At the same time, some immigrant communities established organizations that helped newcomers and the aged with private funding in lieu of using public services. Fraternal organizations and societies also typically offered relief to members, usually in the form of small payments and assistance as needed. A widespread federal social security program would not appear until 1935 (SSA, n.d.).

In 1854, Washington's territorial legislature assigned to the counties the care of all indigent people whose relatives could not support them (Dorpat and McCoy 1998). In 1869, King County acquired 160 acres in Georgetown, south of Seattle, to establish a poor home and

[3] McMenamin's also converted the former ca. 1911 Multnomah County Poor Farm in Troutdale, Oregon to a hotel, now known as Edgefield.

convalescent hospital on the site. In 1894, it constructed a modern facility known as the King County Almshouse, with a 125-bed capacity. It was expanded in 1908 to accommodate 225 beds. In 1931, King County opened Harborview Hospital on First Hill in Seattle, to supplement the Georgetown facility (HistoryLink 2001).

Seattle, as an early large city in the area, was a center for the development of homes for the aged and indigent; even so, there were few options available. In 1878, the Sisters of Providence of the Catholic Church established a hospital at Fifth Avenue and Madison Street in downtown Seattle to care for the poor (HistoryLink 2001). In 1924, the Sisters built Mount St. Vincent's Home for the Aged on the top of West Seattle's High Point hill. The large building within its landscaped site was demolished and replaced with a new facility in the 1960s.

In 1907, philanthropists associated with the Presbyterian Church established the Kenney Presbyterian Home in West Seattle, building a Colonial Revival structure designed by architect David Myers, which opened for residents by 1909. The facility underwent expansions in the 1960s and continues to operate at present.

Outside of Seattle and King County, there were fewer facilities in western Washington. Pierce County's poor farm operated on rural land between the towns of Sumner and Orting, and Snohomish County's poor farm was located on acreage that is now the fairgrounds in Monroe. For military veterans, Washington State established the Washington Soldier's Home in 1891 on 181 acres near Orting, and the Washington Veterans Home in 1910 on 31 acres in Port Orchard.

Offering a more elevated level of care, the Franke Tobey Jones Home in Tacoma was opened in 1925 as a home for the aged and infirm to "live in comfort and dignity, whatever their means." It was developed in part by P.E.O., an international women's charitable sorority, and by Mrs. Franke Tobey Jones, a Tacoma philanthropist and lumber mill heiress who had experienced adversity earlier in her life (Franke Tobey Jones 2023). The building was designed by the Tacoma architecture firm Heath, Gove & Bell, and initially could accommodate 65 residents.

Other Fraternal Homes in Washington State

Only two other fraternal orders appear to have established an institutional home in Washington State at the scale of the Masonic Home of Washington—the Knights of Pythias and the International Order of Odd Fellows. Both buildings featured grand, Period Revival styles, which were intended to provide a dignified living environment for the orders' aging brethren.

The Order of the Knights of Pythias, founded in 1864 in Washington, D.C., had a large membership in the Pacific Northwest in the early 1900s. In 1923, the two Grand Lodges of the Oregon and Washington Knights of Pythias together established the Pythian Home in Vancouver, Washington. An added building provided space for the care of members' orphaned children and operated until the 1960s (Knights of Pythias Retirement Center 2021). After another expansion in the 1980s, the Pythian Home continues to operate as an active retirement housing complex for the greater Vancouver/Portland metropolitan area.

The Odd Fellows formed in England in the early 1700s, and first appeared in the United States in the early 1800s. The fraternity was popular in Oregon and Washington in the late 19th and early 20th centuries. In 1897, the Washington Grand Lodge of Odd Fellows established a home on about 10 acres in Walla Walla for widows, orphans, and elderly members of the state. The current building dates back to 1923 and provides care today for 300 residents (Ponti 2017).

THE DEVELOPMENT OF THE MASONIC HOMES IN PUYALLUP AND DES MOINES/ZENITH

The Original Washington Masonic Home in Puyallup

Toward the end of the 19th century, the Freemasons of Washington Territory sought to establish care for their members who had become destitute or indigent in old age or had been left resourceless, widows or orphans after their death. In the 1880s, the Grand Lodge of Washington (the organization's statewide executive body) undertook fundraising to establish a home for aged members. After almost thirty years, the Grand Lodge had accumulated sufficient resources and was able to establish the Masonic Home of Washington in Puyallup in 1912 (Morris 2013; Nance 1993.; Alsobrook 2020).

This facility was located in Puyallup's South Hill neighborhood, on 26 acres at 14th Avenue SE and 5th Street SE. The site included two houses and two barns, and agricultural fields at the base of the hill. In 1913, an additional building was erected, designed by the Tacoma architecture firm Heath & Gove. The facility housed children, women, and elderly members, and gained some self-sufficiency from its own dairy, livestock, and farm produce grown on-site. By 1923, Puyallup Masonic Home had met its capacity with 52 residents and the need was clear for a larger facility. This led to the development of the subject building. After the subject building was completed in 1927, all residents were moved from Puyallup into the new building.

The Puyallup property remained unoccupied from 1927 until 1938, when it was sold to area Lutherans to be used as the Lutheran Home for the Aged (Price et al. 2002). Beginning in 1952, the site then operated as the Good Samaritan Hospital and was expanded with additional buildings. The complex was demolished by 2019.[4]

The Development of the Masonic Home in Des Moines/Zenith

In 1924, the Grand Lodge of Washington appointed a committee to select a location for an expanded Masonic Home facility, to be located between Tacoma and Seattle, where many of the order's membership resided. In May 1924, the subject site in the hamlet of Zenith was selected for its expansive Puget Sound views and purchased for almost $79,000 from a half-dozen landowners (Kennedy and Schmidt 1989). The initial Property consisted of 85 acres. An appropriation of $200,000 was approved for site improvements (Nance 1993; Werner, n.d.; Kennedy and Schmidt 1989).

Architects Frederick Heath and George Gove, who had designed the earlier Puyallup Masonic Home, were again commissioned to design the main building in late 1924 or early 1925 (their firm by this time called Heath, Gove & Bell). Plans were completed by February 1925 and ground was broken by August 8, 1925, attended by a large crowd. The architect's final drawings were dated December 1925. Initial site work included the construction of three water well pump houses and a water tower, all completed in 1926.

An elaborate Masonic ceremony was held for the laying of the cornerstone of the main building on May 1, 1926. The general contractor was H. Hoard & Company, of Seattle. The building dedication was held on June 21,1927, with a reported attendance of 1,800 people. On July 12, 1927, the subject building was opened, and the 58 residents of the old Puyallup home were moved into their new quarters.

A 1927 newspaper article covered the opening ceremonies and reported on the building's appearance and materials. Interiors featured a main floor reception hall, sitting rooms, library, social hall, auditorium with stage (also called the chapel), and several living rooms. On the second floor were dining rooms, the women's infirmary, and suites of residential rooms. The men's hospital and residential rooms were on the third floor. The fourth and fifth floors were residential rooms. In the basement were billiard and recreation rooms for men and women. The

[4] The 1913 building's cornerstone was removed in 1971 and was installed the following year in the subject building, in a low stone wall in the center of the main floor ramp to the dining room. Around 2007, the cornerstone was removed from that ramp wall and is now held at the Washington Masonic Charities archives in University Place, Washington.

building was reportedly designed to accommodate 254 residents, although other sources cite a maximum of 192 residents (*Seattle Times* 1926, 1927a).

To be admitted to the Home, applicants were reviewed for eligibility. A successful applicant had to be a member of a Masonic lodge, or the Order of the Eastern Star, or the Order of Amaranth (or wife or widow of a member) in good standing for five continuous years and had to be without any other means of support. The applicant had to turn over all their remaining property to the Home. In return, the resident received a private room and daily meals for the rest of their lives, medical attention, a small stipend for purchases, and a decent burial (Washington Masonic Home, n.d.).

By 1930, residents numbered 75 men and 56 women for a total of 131 people. By the mid-1940s, the Board of Trustees began to consider removing the second-floor infirmary and placing it in a new addition. In 1958, the total number of residents had dropped to 159, but with a much higher ratio of women to men, 117 to 42 (Werner, n.d.).

In the 1960s, the Board of Trustees recognized the need for separate facilities for those residents requiring nursing home care. The infirmary was finally moved from the second floor into a separate building, which was attached in a wing extending southeast from the rear of the Home, in 1966. This wing, designed by NBBJ, added approximately 5,800 square feet on the ground floor and 13,300 square feet on the first floor. It contained 12 two-bedroom units, 14 one-bedroom units, 3 four-bed wards, 2 dayrooms, 2 nurse's stations, and examination/treatment rooms. The ground floor was initially left unfinished but was designed to house either 23 additional infirmary beds or on-site staff members (*Seattle Times* 1966).

By the mid-20th century, there were additional changes and modifications to the main building and, in 1972, many of the systems were upgraded. To meet the $350,000 expense of the improvements, 40 acres at the eastern end of the Home's Property were sold off, resulting in the current parcel dimensions (Kennedy and Schmidt 1989).[5]

In 1982, the Masonic Home Property and the town of Zenith were incorporated into the City of Des Moines, Washington.

In 1986, the name of the main building's infirmary wing was changed to Health Care Center to better reflect its use as a skilled nursing facility with 24-hour care. In 1987, an addition to the Health Care Center was

[5] Sources do not explain the apparent discrepancy of the figures, since the original acreage was described as 85 acres, and the current parcel is 30.3 acres. Either the numbers are wrong, or additional acres were sold off at some unknown time.

constructed, which added 25 beds, a solarium, a multipurpose room, a physical therapy room, and a spa pool room. In 1993, the Masonic Home was renamed the Masonic Retirement Center of Washington. In 1994, there were 38 men and 98 women residents ranging in age from 66 to 98 (Werner, n.d.).

Around 2007, use of the Property as a retirement home was decommissioned, and from about 2007 to 2012 the building functioned as a nonprofit event center called Landmark on the Sound. Around 2013, the Property was put on the market for sale, and sold in 2019 to the current owner.

DEMOGRAPHICS OF THE RESIDENTS

For eligible men and women, the Washington Masonic Home provided an alternative to their local county-run poor farm. Because the mission of the Home was to provide a residence of last resort, applicants had to demonstrate that they were incapable of providing for their own care, and, if accepted, were required to turn over all their remaining assets to the Home. By the nature and mission of the institution, residents of the Masonic Home were aged, unable to work, had no family able to take care of them, and were victims of adversity, infirmity, or disability. However, promotional literature for the Home emphasized that it was a retirement home, not a nursing home.

The number of residents in the Home varied year to year, but typically numbered from about 130 to 175. The ratio of men to women varied greatly but, in general, the percentage of women to men increased over time. In 1931, the resident population was two-thirds men, but in 1986 men constituted only one-fourth.

In the 1930, 1940, and 1950 federal census records, all residents of the Masonic Home were listed as white, reflecting the inherent racial segregation that was found in American Freemasonry at the time. In any given year, most residents were aged in their 70s and 80s. The relatively few obituaries from the Masonic Home that were published in the newspapers reveal that male residents often came from a range of blue-collar and white-collar occupations, while women were typically widows.

Residents arrived from component lodges and chapters throughout Washington State, both rural and urban. Many of the residents appeared to have come from the Puget Sound area, Spokane, and other urban centers where there were a greater number of member lodges. Duration of residency varied by person, but most residents remained in the Home until their deaths.

The Washington Masonic Home was initially open to women who were the wives or widows of Master Masons who had been in good standing

for the previous five years. Also eligible were members of the Order of the Eastern Star, a Masonic-related organization for men and women established in the second half of the 19th century. As late as the early 1980s, the Order of the Eastern Star eligibility was limited, but by the early 1990s, eligibility had been revised to include a much wider population and types of relationships.

DESIGNER PROFILES

The Original Architect: Heath, Gove & Bell

The original building was designed by Heath, Gove & Bell, a significant and prolific firm based in Tacoma, Washington. The firm was active from the mid-1910s through the mid-1950s, designing a wide range of building types and employing several architectural styles. The firm was a partnership of Frederick Henry Heath (1861–1953), George Gove (1869–1956), and Herbert A. Bell (1884–1951). Frederick Heath has been described as "one of the West's most prominent architects" (Sullivan and Sivinski 1999). George Gove was the lead architect on the Washington Masonic Home project, although the firm likely worked collaboratively (Erickson 2015).[6]

Heath was born in La Crosse, Wisconsin, in 1861, and was a self-taught architect. He moved to Minneapolis around 1883, where he worked ten years for Warren H. Hayes, a noted local architect. In 1893, Heath moved to Tacoma, and had established his architectural office by 1896, but little is known of these early years.

Between 1901 and 1903, Heath was in partnership with A. Walter Spaulding and A. J. Russell. Around this time, he began to serve as the official school architect for the City of Tacoma, an arrangement which lasted until 1920, and for which he designed 18 schools (Houser, n.d.).

From 1903 to 1908, and from 1910 to 1912, Heath worked as a sole practitioner. Between 1908 and 1910, he formed a partnership with Luther Twichell, a friend and former colleague in Minneapolis who had moved west to join Heath in his practice.

Projects during these early years of 1901 to 1912 include the following extant buildings:

- Tacoma (Stadium) High School and Stadium Bowl, Tacoma (1906 and 1910).
- Sandberg Building, Tacoma (1907–1908).

[6] The ornate, commemorative 1927 bronze plaque from the entry vestibule, now held at the Washington Masonic Archives, states the architect was "George Gove, of Heath, Gove & Bell."

- Knights of Pythias Temple, Tacoma (1907).
- First Church of Christ, Scientist, Tacoma (1908–1911).
- National Realty Building/Puget Sound National Bank/Key Bank Center, Tacoma (1909–1911).
- Yakima Masonic Temple (1911, altered).

The Realty Building, at 14 stories, was reportedly the tallest building in Washington when completed, and was surpassed only by the construction of Seattle's Smith Tower in 1914.

In 1912, Heath entered a partnership with architect George Gove. Gove, a native of Rochester, Minnesota, had arrived in Tacoma in 1908, where he operated as a sole practitioner for four years. By 1914, Heath & Gove added a partner, Herbert A. Bell. Bell was from Tacoma and well known to Heath, having worked as a draftsman for him since about 1906. The firm name was formally changed to Heath, Gove & Bell in 1919.

In total, the firm designed over 600 projects, including residential and commercial structures, religious buildings, hospitals, public buildings, and park buildings (Heath was a member of Tacoma's Metropolitan Park Board from 1910 to 1918). Several of these have been listed in the national, state, and local historic registers.

A sample of the firm's projects after 1912 include:

- Masonic Home of Washington, Puyallup, Washington (1912).
- Paradise Inn, Mount Rainier National Park, Ashford, Washington (1915–1917).
- Northern State Hospital, Sedro-Wooley (1915–1930): the firm designed twenty-six buildings and three structures within an existing campus, in the Spanish Colonial Revival style; as well as vernacular style wood farm buildings in an established agricultural landscape designed by the Olmsted Brothers.
- Rhodesleigh, Lakewood, Washington (1922): Tudor Revival style home of department store owner Henry A. Rhodes.
- First Baptist Church, Tacoma (1923–1925).
- Tacoma General Hospital (1923).
- Auburn Masonic Temple, Auburn, Washington (1924).
- Franke Tobey Jones Home, Tacoma (1925).
- A. V. Love Dry Goods Building, Seattle (1925, demolished).
- Masonic Home of Washington, Zenith, Washington (1926–1927).
- Commissary at the State Soldier's Home, Orting, Washington (1927).
- Several buildings at Western State Hospital, Steilacoom, Washington (1930s–1940s, often with Mock & Morrison).

- Sitka Pioneer's Home, Sitka, Alaska (1934).
- Thomson Hall and Communications Hall, University of Washington, Seattle (1948 and 1951).

Notably, Heath, Gove & Bell designed several buildings for fraternal orders over the years (as listed above) and throughout the region.

In 1951, the firm's youngest partner, Herbert Bell, died at age 67. The most senior partner, Frederick Heath, remained active in the firm's affairs until shortly before his death at age 92 in 1953. George Gove continued operating the office until his death in 1956, at age 87.

Similar projects by Heath, Gove & Bell. Two Heath, Gove & Bell projects have some features that are similar to the former Masonic Home in Des Moines—the Franke Tobey Jones Home and the Sitka Pioneer's Home.

The Franke Tobey Jones Home in Tacoma was completed and opened in 1925 as a rest home, developed in part by P.E.O., an international women's charitable sorority, and Tacoma philanthropists. The facility was designed as a two-and-a-half story English Tudor mansion that could accommodate 65 residents. The original building follows a T-shaped plan, with residential wings opening to a lawn and circular drive, and a support wing at the rear. The Jones Home was designed with ramps, rather than stairs, connecting the floors for the convenience of its residents (Franke Tobey Jones 2023). Because both the T-plan and use of ramps are found in the Des Moines Masonic Home, which was designed two years later, the Jones Home project may have provided some precedent.

The Sitka Pioneer's Home was completed on its hilltop site in 1934. In form and detail, it closely resembles the subject building, which was constructed seven years earlier. The three-story stucco-clad reinforced concrete building was built to replace a collection of wood-frame buildings that had served as the Pioneer Home since its establishment by the Territory of Alaska in 1913. The original building design followed a wide C-shaped plan with two residential wings overlooking a landscaped lawn and Sitka's harbor. A rear wing was added later, in 1956.

The Original Builder, M. Hoard & Company

The original builder of the Washington Masonic Home in Zenith was M. Hoard & Company, established in Seattle around 1920 by Maurice Aaron Hoard. The firm and related entities, such as the Hoard Engineering Company, constructed a wide range of building types from the mid-1910s until about 1950, and undertook numerous prominent commissions in Washington State.

Maurice Hoard was born in Clayton, Missouri, in 1890, but little is known about his early life or education. He reportedly arrived in Seattle in 1910 (Seattle Post-Intelligencer 1964).[7] By 1916, he was listed in city directories under carpenter/contractor/builder, and in the 1920 federal census he listed his profession as a self-employed building contractor.

Early projects constructed by Hoard's company were located in Seattle, and include the Seattle Day Nursery (Henry Bittman, 1921, demolished); an elementary school for St. Margaret's parish (Lundberg & Mahon, 1923, demolished); and the S. H. Kress & Company store (1923) (*Seattle Times* 1921, 1923b, 1923c). At an industrial site on the Duwamish River, M. Hoard & Company constructed a distribution plant for the Associated Oil Company (*Seattle Times* 1923a). The following year, the firm served as general contractor for the Herzl Synagogue (Beezer Brothers, 1924, altered); and for the Fraternal Order of Eagles Temple (Frederick J. Peters, 1924–1927, altered) (*Seattle Times* 1924a, 1924b, 1927b).

In February 1926, Maurice Hoard was awarded the general contract to build the Washington Masonic Home in Zenith. Less than a month later, he incorporated the Hoard Engineering Company with S. P. Peck (*Seattle Times* March 12, 1926; February 26, 1926). Afterward, the Hoard Engineering Company apparently served as Maurice Hoard's primary construction company.

At the close of the 1920s, other projects completed by Hoard's firms included a two-story battery and radio factory building (Hancock & Lockman, 1928) for the Marconi Manufacturing Company; and the first phase of the ornate, Italian Renaissance-style mausoleum building (1928–1931) for Acacia Memorial Cemetery (Seattle Post-Intelligencer July 8, 1928; February 10,1928). The latter was initially a venture of the Greater Seattle Masonic Lodge in 1926, but it was sold to another investor in 1927. The mausoleum was valued with an estimated construction cost of over $1.2 million dollars in 1928, but the onset of the Great Depression while the work was underway resulted in greatly simplified interiors.

Hoard's firm was likely impacted by the economic slowdown of the Depression years during the early 1930s. An exception was a new two-story masonry commercial structure (Frank Mahon 1932) at 600 S. Jackson Street for the Pacific Corporate Investment Company. The building is now located in the Seattle Chinatown-International District and has been continuously occupied by the Higo Variety Store, a long-time retailer in Seattle's Japanese community, since 1932 (*Seattle Times* 1932; HistoryLink 2009).

[7] The age appears to be in error; other sources confirm birth year 1890.

By the mid-1930s, large institutional projects became available, often related to federal Works Progress Association funds. Hoard Engineering began to find work outside the Seattle area. Projects from the mid-1930s until the start of World War II located outside Seattle included unmarried officer's quarters and a headquarters building at Fort Lewis (both ca. 1934); women's dormitory and the women's gymnasium (both ca. 1936) at Washington State University in Pullman; the campus elementary school (1942) at Western Washington University's College of Education in Bellingham; and the 100-bed Renton Hospital (George W. Stoddard 1943) (Naramore, Grainger & Thomas, 1937) (Bellingham Herald 1934; *Seattle Times* 1936; *Tacoma Times* 1941; Seattle Post-Intelligencer 1943). Projects in Seattle from the same period included two projects for the University of Washington—the Hall Health infirmary building (A.H. Albertson, 1936); and the excavation and foundation work contract for the Chemistry Building, later known as Bagley Hall (*Seattle Star* August 31, 1935; December 14, 1935).

Very few projects constructed by Hoard Engineering could be identified in the postwar period. Maurice Hoard may have retired in the late 1940s or the 1950s. He was a member of the fraternal orders of the Elks, the Eagles, and the Freemasons. Hoard died in October 1964 at home in Seattle, at age 69.

The Original Landscape Architect, L. Glenn Hall

Original landscape plans indicate that L. Glenn Hall was the designer of the grounds around the Masonic Home. A sheet dated March 1927 for the design of the grounds immediately around the main building lists the designers as L. Glenn Hall and J. L. Bossemeyer, Associate, in the title block.[8] A second sheet dated January 1928 for the design of the front grounds, pool, and circular drive list only Hall as landscape architect in the title block, with Heath, Gove & Bell as the architects.

L. Glenn Hall (1893–1954) was a prominent West Coast landscape architect and planner who was best known for his work in California in the 1930s and 1940s. He was born in Salisbury, North Carolina, and studied architecture at the Carnegie Institute of Technology in 1916–1917 but did not graduate. He was employed as a civil engineer and estimator until 1921, when he attended Harvard University to study

[8] James L. Bossemeyer, Hall's associate listed on the March 1927 drawing, worked with Hall in 1927 at the Seattle Parks Board as a horticulturalist, according to Seattle city directories. By late 1929 he was serving as the landscape architect for the Seattle Parks Board after Hall departed, and by 1932 he had been appointed the head superintendent of the Tacoma Parks Board. By the late 1930s he had moved to the San Francisco area where he served as the head of the regional office of the National Park Service's United States Travel Bureau, and later as its national director during the 1940s.

landscape architecture and city planning. While there, he worked for the City Planning Board of Boston and in the office of prominent landscape architect and planner John Nolen. In 1924, he terminated his formal schooling and was employed full-time by the City Planning Board of Boston, where he held the title of Assistant Director of Zoning.

In 1925, he moved to Seattle, where he was employed as the landscape architect and park engineer for the Seattle Parks Department from April 1925 to January 1928, in charge of design and construction. Hall's work on the Masonic Home would have been an early work by the designer, and toward the end of his stay in the Seattle area. Few other works by Hall in Washington State could be identified.

Hall's primary accomplishment during his tenure at the Seattle Parks Department was a comprehensive review and inventory of parks and school district facilities and open spaces, as part of an effort to create a unified park and recreation system. Hall also designed at least one park proposal, for a large hillside site overlooking downtown, now occupied by Harborview Hospital. Although unbuilt, the proposed "Harborview Park" design (dated 1925–1926) included extensive terracing; boys' and girls' playgrounds; formal lawns, pathways, and stairs; meandering wooded paths; integrated view drives; an elongated covered bandstand structure; and integrated two existing electric sub-stations on the site (Park Department and School District No. 1 1928).

In early 1928, Hall left Seattle to accept a position as the Landscape Architect for the City of Los Angeles, and to serve as the Chief of the Division of Forestry (*Seattle Times* April 8, 1925, January 9, 1928; Seattle Post-Intelligencer 1928; American Society of Landscape Architects 1954). In the early and mid-1930s he worked for the U.S. Forest Service in San Francisco as Landscape Engineer, in charge of administrative site planning and recreation planning for the California region.

Beginning in 1938, Hall worked for three years in private practice. Work included Holly Park in San Francisco, a public housing project. In 1941, Hall moved to Washington, D.C., for two years to work with the New Deal-era Federal Works Agency Public Buildings Administration, then returned to California. Between 1943 and his death in 1953, he served as San Francisco's Assistant Director of Planning, then Planning Director for the City of Sacramento, and later as the Planning Engineer for the City of Oakland.

According to one source, Hall's career highlights included the development and establishment of street-tree programs for three major cities—Seattle, Los Angeles, and San Francisco—which the American Society of Landscape Architects' journal described as "a contribution

so great it cannot be measured" (American Society of Landscape Architects 1954). His role in the development and establishment of Seattle's street-tree system could not be confirmed. Other significant work included the establishment of new parks in Los Angeles; community centers in San Francisco; and programs for downtown parking, redevelopment, regional parks, airports, and highways for the City and County of Sacramento. Glenn Hall was active in the American Society of Landscape Architects, the League of California Cities, American Institute of Planners, and the American Society of Planning Officials.

The Architect of the 1966 Infirmary Wing, Naramore, Bain, Brady & Johanson

NBBJ was the architect of the 1966 infirmary wing. NBBJ was established in 1943 by Floyd Naramore (1896–1985); William Bain, Sr. (1896–1985); Cliff Brady (1894–1963); and Perry Johanson (1910–1981), who had each previously had established careers.

The partnership was an attempt to take advantage of large federal contracts commissioned by the federal government during World War II, which could be taken on only by large firms with more resources. The partnership capitalized on the individual skills of each partner: Johanson's work in hospital and health care design; Bain's well-established residential work; and Brady's and Naramore's work designing education buildings. The four architects found their personalities compatible and kept their partnership going after the war, emphasizing a "team" approach to design and practice.

The firm was at the forefront of Modern-style designs in the region. It focused on institutional work in the 1940s with public schools for the Seattle School District, and buildings for Swedish Hospital. In the 1950s and 1960s, notable work included a new hospital and medical school buildings for the University of Washington (1950 onward); multiple schools and government and institutional buildings as well as Boeing Pre-Flight Facilities in Renton and Moses Lake, Washington (1956–1958).

By the 1960s, the firm was expanding beyond the region. Notably NBBJ was the local architect for Minoru Yamasaki & Associates' United States Science Pavilion (1962) at the Seattle World's Fair, which led to other work; NBBJ was also associated architect for two other Yamasaki & Associates projects in Seattle, the IBM Building (1962–1964), and Rainier Bank tower (1972–1977).

In 1977, NBBJ merged with the Columbus, Ohio, based firm of Nitschke-Godwin-Boehm, but retained the name NBBJ. The firm has an international clientele, with offices worldwide. In 2015, NBBJ was the third-largest firm in the United States and one of the largest in the world.

ARCHITECTURAL CONTEXT – CHATEAUESQUE STYLE

The Chateauesque style was patterned after the designs of monumental French chateaus of the 16th century and was popularized in the United States by architect Richard Morris Hunt beginning in the 1880s. The style is grand and elaborate, emulating European taste, and it became the standard for the mansions of the East Coast's upper-class citizenry into the 1910s. The style eventually became popular for smaller dwellings; however, in the Pacific Northwest it was mainly used for large public and commercial buildings intended to impress, and which were almost always architect designed. Like the French chateaus the style emulates, Chateauesque style buildings may incorporate Gothic and Renaissance detailing.

Chateauesque style buildings are typically masonry structures, asymmetrical in plan, and feature heavily modulated facades, massive and steeply pitched hipped (and sometimes gabled) roofs, and gabled wall dormers. Low relief terra-cotta carving may ornament the dormer gables and window and door surrounds. Chimneys are tall and have decorative corbelled tops. Round towers topped by a conical roof are usually present. Balconies feature Gothic-inspired quatrefoil or arched tracery patterns. Large entry doors are often highlighted by round, segmental, or Gothic arches. By the 1920s and 1930s, the style was less common, but some components of the style persisted in French Provincial or French Eclectic style houses, such as steeply pitched hipped roofs and round conical towers serving as entries. Examples of the style in Washington include Stadium High School in Tacoma (1891–1906), Denny Hall at the University of Washington in Seattle (1892), Spokane County Courthouse (1895), and Thompson Hall at Washington State University in Pullman (1895) (DAHP, n.d.).

The Masonic Home main building represents a relatively late and unusual application of the style in the 1920s, when popular Period Revival styles in architecture were more likely to be Colonial Revival or Tudor Revival. While the Masonic Home lacks some characteristic style features, such as round towers or conspicuous asymmetry, the size of the building, its residential use, and ornate public spaces evoke the grand scale of the Chateauesque. The stacks of solariums at the north and south wing ends evoke tower forms, and a nod to asymmetry is accomplished by the one-story projection south of the main entry on the front facade. Additionally, the building massing also appears asymmetrical and complex when viewed in the round, or from the north or south, due to the projecting rear wing.

3.3 Potential Impacts

This section provides the methodology and thresholds for significance, followed by the potential impacts on cultural resources from the No Action Alternative and Alternatives 1 and 2. Note that the analysis prepared by NW Vernacular and Painter Preservation was conducted with the limits of disturbance plan prepared by the applicant in January 2023. That plan was revised October 26, 2023, to better demonstrate that the front gates and wall were proposed for demolition (as shown in Appendix B, *Demolition Plan*).

3.3.1 Methodology and Thresholds for Significance

ANALYSIS OF IMPACTS

Adverse impacts result from a project action that diminishes a cultural resource's essential features that qualify it for listing in the National Register of Historic Places (National Register), State of Washington Heritage Register (Washington Heritage Register), designation as a City of Des Moines Landmark (Des Moines Landmark), or a City of Des Moines Property of Local Significance (Property of Local Significance).

Project effects are sorted based on the threshold for potential significant impact on a cultural resource's architectural integrity. Integrity is the ability of a resource to convey its significance and is required for a resource to be listed in or eligible for listing in the National Register, or Washington Heritage Register, or designated as or eligible for designation as a Des Moines Landmark or Property of Local Significance. Integrity consists of seven qualities (location, design, setting, materials, workmanship, feeling, and association). Most of these qualities need to be present to convey significance. Project effects are divided into three categories:

- **No effect:** No change to resource integrity.
- **Less-than-significant:** These are direct or indirect effects that may be temporary, reversible, or diminish resource integrity, but the resource retains its ability to convey its significance and retains those characteristics that qualify it for listing or designation in a historic register.
- **Significant:** These are permanent direct or indirect effects, per CFR 800.5, that may diminish resource integrity such that the resource no longer retains the ability to convey its significance and may lose those characteristics that qualify it for listing or designation in a historic register.

Table 3-4 provides a summary of effects for historic resources according to the alternatives.

TABLE 3-4 **Historic Resources Impacts Summary**

Property ID	Historic Name	No Action Alternative	Alternative 1: Demolition Alternative	Alternative 2: Historic Preservation and Future Adaptive Reuse Alternative
NA	Masonic Home of Washington Historic District	Significant	Significant	Less-than-significant
671480	Masonic Home of Washington – Water Tower	Significant	Significant	Less-than-significant
671482	Masonic Home of Washington – Main Building	Significant	Significant	Less-than-significant
731166	Masonic Home of Washington – Octagonal Pump House	Significant	Significant	Less-than-significant
731167	Masonic Home of Washington – Front Wall and Gate	Significant	Significant	Less-than-significant
731168	Masonic Home of Washington – Water Tower Pump House	Significant	Significant	Less-than-significant
731169	Masonic Home of Washington – Garage	Significant	Significant	Less-than-significant
731170	Masonic Home of Washington – Outdoor Kitchen	Significant	Significant	Less-than-significant
731171	Masonic Home of Washington – Outdoor Restroom	Significant	Significant	Less-than-significant
731175	Masonic Home of Washington – Central Oval, West, and North Lawns	Significant	Significant	Less-than-significant
731176	Masonic Home of Washington – Eastern Woods	Significant	Less-than-significant	Less-than-significant

3.3.2 Impacts Common to All Alternatives

There are no impacts common to all alternatives.

3.3.3 No Action Alternative

The No Action Alternative would not result in construction impacts since no work would occur. Potential operational impacts over time would be

related to ongoing vacancy, neglect, and the impact of both natural and human-driven forces on the Property.

As required by SEPA, the No Action Alternative serves as the baseline condition for comparison with the other alternatives, and to describe impacts if the proposed project does not proceed.

HISTORIC RESOURCES

Under the No Action Alternative, there would be a continuation of the existing site conditions, no investment in ongoing operations or monitoring, minimum maintenance, and the ongoing state of extant historic resources as vacant. Vacant buildings and land in Des Moines must comply with the International Property Maintenance Code (IPMC) and comply with Chapter 7.44 DMMC, DMMC 14.05.120, and DMMC 18.195.210 for the management of weeds, excess plant growth, and overhanging, obstructing, and nuisance vegetation. Section 301.3 of the IPMC requires maintaining clean, safe, secure, and sanitary conditions as part of minimum maintenance. The International Fire Code (IFC) Section 311.1 requires the safeguarding and a minimum level of maintenance in compliance with IFC Sections 311.1.1 through 311.6. The Property would continue to incur holding costs indefinitely until potential redevelopment, including but not limited to taxes and insurance, legal, contingency, and financing costs estimated to range from $28,271 million to $30,963 million (OAC Services 2023, 351).

Existing site conditions include temporary protective measures at building openings to reduce vandalism and trespassing. A fence extends around the full Property. Utilities are turned off to the buildings. On-site security and monitoring are currently provided. There is no regular activity in, or use of, the Property. There are existing building envelope condition issues at the main building that would not be repaired (OAC Services 2023). Existing protective measures would be repaired when damaged or renewed only to the extent necessary to comply with IPMC Section 301.3 and IFC Section 311.1. Landscape vegetation and site features would be maintained only to the extent necessary to comply with IPMC Section 301.3 and the DMMC. Uses activating the buildings to support repairs and maintenance would not be sought. Prospective buyers or development partners would not be sought.

The rate of affect, slow versus rapid, may vary amongst the historic resources depending on their materials and affecting forces. For example, fire and vandalism would have a more pronounced effect on the open, wood-frame outdoor kitchen versus the steel water tower. The central oval, west, and north lawns may exhibit less immediate effect from exposure to the elements and maintenance only to the extent

necessary to comply with IPMC Section 301.3 and the DMMC than the main building. Long-term, however, the cost and complexity to repair damage to the main building may be greater than the complexity and cost of repairs to the designed landscape over a similar period. The neglect of the eastern woods may have less of an immediate affect than neglect of the designed landscape. Long-term, however, understory growth managed at minimum maintenance levels within the eastern woods increases the risk for greater fire severity and associated vegetation and building damage or loss. A minimum level of landscape vegetation maintenance (to the extent necessary to comply with IPMC Section 301.3 and DMMC) may result in damage to the plants and the buildings from broken limbs during storms or long-term with the trees dying due to disease or damage. A small failure in the building envelope (i.e., roof, windows, doorways, exterior walls) for a building may quickly accelerate the effects of exposure to natural forces (e.g., wind or rain) and deterioration of the building's structure and interior finishes. Closing off building interiors and the lack of air circulation within buildings may result in mold and pest infiltration that damage the buildings from the inside out. The level of effect may vary amongst historic resources depending on both their materials, complexity of character-defining features, and overall scale. Existing conditions require investment to repair (OAC Services 2023, Appendix C). Deferring these repairs to existing conditions coupled with the accumulation of additional repair needs would result in increased cost and work necessary to bring historic resources back into active use following a period of vacancy.

Neglect and the Impact of Natural and Human-Driven Forces

The No Action Alternative is anticipated to result in the deterioration and eventual loss of the historic resources within the project area due to neglect, the impact of natural forces, and the impact of human-driven forces. These all increase the severity of one another. This includes exposure to the elements with maintenance only to the extent necessary to comply with IPMC Section 301.3, natural or human caused fire, and vandalism. Neglect may also result in the loss of buildings and structures through condemnation per City of Des Moines code as hazardous or blighted. Neglect of the Property would result, at different rates, in the loss of integrity to all historic resources identified in Table 3-3 such that the individual resources no longer retain their ability to convey their significance and may lose those characteristics that qualify them for listing or designation in a historic register or contributing to the eligible Masonic Home of Washington Historic District identified in Table 3-2. Loss of historic resources would result in a loss of integrity for this eligible historic district such that the historic district no longer retains its ability to convey its significance due to the

loss of those contributing resources that qualify it for listing or designation in a historic register. **Impacts would be significant.**

3.3.4 Alternative 1: Demolition Alternative

The Demolition Alternative would result in construction impacts. No potential operational impacts over time are anticipated since resources would have been removed and no ongoing activity is identified for the Property.

The Demolition Alternative would include the following impacts:

- Full demolition of historic resources.
- Substantial demolition of historic resources.
- Partial demolition of historic resources.

HISTORIC RESOURCES

Under the Demolition Alternative, most of the historic resources identified in Table 3-3 would be fully or substantially demolished. The exceptions to this are the partial demolition of the front wall and gate, and the eastern woods (Ascendent 2023).

The demolition work within the limits of disturbance shown on the October 26, 2023, Limits of Disturbance Plan is anticipated to remove all buildings, structures, site flatwork, retaining walls, landscaping or other objects, trees, plantings and understory vegetation, and sod (Ascendent 2023). Provision is made for retention of vegetation within the limits of disturbance where possible; however, since it is not known if retention would be possible or what that is based upon, this analysis assumes retention would not be possible. The Property would incur the costs of demolition and continue to incur holding costs including but not limited to taxes and insurance, legal, and financing costs until the Property is redeveloped (OAC Services 2023).

The demolition work would result in a loss of integrity for the eligible Masonic Home of Washington Historic District identified in Table 3-2 such that the historic district would no longer retain its ability to convey its significance due to the loss of those contributing resources that qualify it for listing or designation in a historic register. **Impacts would be significant.**

Demolition would happen at the following three levels, based on how the Limits of Disturbance either encompass all of or overlap parts of historic resources within the project area. The following is organized by

level of demolition and addresses impacts for individual historic resources.

Full Demolition

Work resulting in the full demolition of a historic resource would remove all above- and below-grade aspects of that resource. For buildings, this includes the roof, structure, foundation, all foundation and immediate site plantings (trees, shrubs, sod, perennials), all circulation features (paved driveways, steps, ramps, walkways, and parking areas), and all in-ground utilities associated with the building within the limits of disturbance shown on the October 28, 2022, Limits of Disturbance Plan (Ascendent 2023). No salvage work would occur. Demolition would occur using excavators with materials sorted by recyclable and non-recyclable materials and hauled off-site for disposal. Work would employ best management practices to reduce dust, erosion, and noise generation (Ascendent 2023, 2-4). Work would demolish the water tower (Property ID 671480), main building (Property ID 671482), octagonal pump house (Property ID 731166), water tower pump house (Property ID 731168), garage (Property ID 731169), outdoor kitchen (Property ID 731170), the outdoor restroom (Property ID 731171), and front wall and gate (Property ID 731167).

Loss of the historic resources through full demolition would result in the historic resources no longer retaining their ability to convey their significance. The historic resources would lose those characteristics that qualify them for listing or designation in a historic register or contributing to the eligible Masonic Home of Washington Historic District identified in Table 3-2. **Impacts would be significant.**

Substantial Demolition

Work resulting in substantial demolition occurs where most but not all the historic resource is within the limits of disturbance shown on the October 28, 2022, Limits of Disturbance Plan (Ascendent 2023). This work would substantially demolish the central oval, west, and north lawns (Property ID 731175). Only parts of the lawn areas of the west lawn outside the limits of disturbance would be retained. All other areas of the central oval, west, and north lawns are within the limits of disturbance. For these areas, the demolition work would remove all above- and below-grade aspects of the historic resource. For this designed landscape, this includes circulation features (paved driveway and walkways), railings, curbing, oval pool, vegetation (sod, ornamental and specimen trees, shrubs, and perennials), structures and site furnishings (including edging, retaining wall, light standards, and seating), and all associated in-ground utilities within the limits of disturbance shown on the October 28, 2022, Limits of Disturbance Plan

(Ascendent 2023). No salvage work would occur. Demolition would occur using excavators with materials sorted by recyclable and non-recyclable materials and hauled off-site for disposal. Work would employ best management practices to reduce dust, erosion, and noise generation (Ascendent 2023).

Loss of most character-defining features of central oval, west, and north lawns would result through substantial demolition. This loss would result in the historic resource no longer retaining its ability to convey its significance. The historic resource would lose those characteristics that qualify it for listing or designation in a historic register and contributing to the eligible Masonic Home of Washington Historic District identified in Table 3-2. **Impacts would be significant.**

Partial Demolition

Work resulting in partial demolition occurs where some but not all of the historic resource is within the limits of disturbance shown on the October 26, 2023, Limits of Disturbance Plan (Ascendent 2023). This work would partially demolish the eastern woods (Property ID 731176).

For areas within the limits of disturbance, the demolition work would remove all above- and below-grade aspects of the historic resources. No salvage work would occur. Demolition would occur using excavators with materials sorted by recyclable and non-recyclable materials and hauled off-site for disposal. Work would employ best management practices to reduce dust, erosion, and noise generation (Ascendent 2023).

For the eastern woods, only the pathways to the picnic area and the water tower, including vegetation directly adjacent to the pathways, would be removed. The remainder of the eastern woods are outside the limits of disturbance and would be retained.

Loss of character-defining features through partial demolition of the eastern woods would result in the historic resource no longer retaining its ability to convey its significance. The historic resource would lose some characteristics but not to the degree that it no longer qualifies as contributing to the eligible Masonic Home of Washington Historic District identified in Table 3-2. **Impacts would be significant.**

3.3.5 Alternative 2: Historic Preservation and Potential Future Adaptive Reuse Alternative

Alternative 2 would result in construction impacts since work would occur to mothball the historic resources. Potential operational impacts

over time would be related to ongoing vacancy, the impact of both natural and human-driven forces on the Property, and renewal as needed of temporary protective measures.

HISTORIC RESOURCES

Alternative 2 would mothball the existing structures on-site (City of Des Moines 2022). Mothballing would include the main building (Property ID 671482), water tower (Property ID 671480), octagonal pump house (Property ID 731166), water tower pump house (Property ID 731168), garage (Property ID 731169), outdoor kitchen (Property ID 731170), outdoor restroom (Property ID 731171), structures associated with the central oval, west, and north lawns (Property ID 731175), the front wall and gate (Property ID 731167), and eastern woods (Property ID 731176).

Mothballing is when a building is closed up temporarily to protect it from weather and secure it from vandalism. The mothballing would follow guidance in the National Park Service's Preservation Brief 31 "Mothballing Historic Buildings" (Park 1993). The intent would be to protect the historic resources from natural forces and human-driven forces for a period of 15 years until a use can be identified for the Property that provides an opportunity to activate and integrate the historic resources and designed landscape with that new use. This would involve physical repairs to stabilize the exteriors of buildings and structures, provide security protection, and provide regular monitoring. Hard costs specific to mothballing are estimated at $400,000 (OAC Services 2023, i–ii). The Property would continue to incur holding costs until redevelopment, including but not limited to taxes and insurance, legal, contingency, and financing costs estimated to range from $28,271 million up to $30,963 million (OAC Services 2023, 351).

Mothballing includes the following basic steps and occurs when all other options for identifying productive use(s) and funds for rehabilitation have been exhausted:

- Preparing detailed documentation of the historic resources.
- Stabilizing to prevent future deterioration while the historic resources are not being used.
- Securing the historic resources systems.
- Creating and implementing an ongoing maintenance and monitoring program to ensure protection of the historic resources.

The detailed documentation of the historic resources prepared as technical reports for this Draft Environmental Impact Statement (EIS) would guide mothballing (Peterson 2023; OAC Services 2023).

Existing conditions include several items necessary for mothballing. These are the temporary protective measures installed at the buildings openings to reduce vandalism and trespassing. The fence that extends around the full project area, including sections added at gates. Utilities are also turned off to the buildings. The existing buildings are actively monitored and maintained (OAC Services 2023).

The existing building envelope condition issues identified in the 2023 *Building Integrity Assessment* report that are necessary to protect the exteriors from moisture penetration would be repaired (OAC Services 2023). Work would install adequate ventilation to the interior of each building. This includes installing tamper-resistant vents at building openings and associated monitoring equipment to confirm an adequate air exchange for the building interiors. Work would repair as necessary the existing protective measures for the duration of the mothballing period.

Work would include the development and implementation of a plan for monitoring and ongoing maintenance of the protective measures. This would include regular monitoring of the project area for the duration of the mothballing period. Pest control would be ongoing for the buildings. Vegetation management would be limited to the minimum necessary to avoid hazardous conditions and reduce fuel loads relative to fire and comply with Chapter 7.44 DMMC, DMMC 14.05.120, and DMMC 18.195.210 for the management of weeds, excess plant growth, and overhanging, obstructing, and nuisance vegetation.

Mothballing

Alternative 2: Historic Preservation and Potential Future Adaptive Reuse provides for the mothballing of the main building (Property ID 671482), water tower (Property ID 671480), octagonal pump house (Property ID 731166), water tower pump house (Property ID 731168), garage (Property ID 731169), outdoor kitchen (Property ID 731170), outdoor restroom (Property ID 731171), structures associated with the central oval, west, and north lawns (Property ID 731175), the front wall and gate (Property ID 731167), and the eastern woods (Property ID 731176). The historic resources would retain those characteristics that qualify them for listing or designation in a historic register or contributing to the eligible Masonic Home of Washington Historic District identified in Table 3-2. The eligible historic district would retain the contributing resources that qualify it for listing or designation in a historic register. **Impacts would be less-than-significant.**

3.4 Avoidance, Minimization, and Mitigation Measures

This section identifies mitigation measures that could avoid, minimize, or reduce potential impacts below the level of significance. Mitigation measures that retain resources, such as mothballing, are generally preferred as they retain the resource and the potential for future adaptive reuse. Mitigation payment is provided as a means to resolve significant unavoidable adverse impacts on resources having statewide significance. Each of the mitigation payment items is tailored to address impacts on the City of Des Moines, areas of significance specific to the resource that supports its statewide significance, and to direct mitigation toward underrepresented communities associated with these areas of significance. Mitigation payment is directed to the City for capital project funding and to DAHP for survey work rather than a local historical society or institution, as the entities with local capital project capacity and the expertise and statewide capacity to effectively implement the mitigation payment items.

3.4.1 Mitigation Measures Specific to Each Action Alternative

NO ACTION ALTERNATIVE

Historic Built Environment Resources

The following mitigation measure is proposed as part of this Draft EIS to reduce, over time, the impacts on the main building and minimize impacts on the eligible Masonic Home Historic District.

- Vacant buildings and land in Des Moines must comply with the IPMC and comply with Chapter 7.44 DMMC, DMMC 14.05.120, and DMMC 18.195.210 for the management of weeds, excess plant growth, and overhanging, obstructing, and nuisance vegetation. Section 301.3 of the IPMC requires maintaining clean, safe, secure, and sanitary conditions as part of minimum maintenance. The IFC Section 311.1 requires the safeguarding and a minimum level of maintenance in compliance with IFC Sections 311.1.1 through 311.6.

ALTERNATIVE 1: DEMOLITION ALTERNATIVE

Historic Built Environment Resources

The following mitigation measures are proposed as part of this Draft EIS. The intent is for all of these mitigation measures to be completed based on the state level of significance under National Register Criteria

for Evaluation A and C and the scale of the historic resources consisting of an eligible historic district with 10 eligible contributing resources, three of which are also individually National Register eligible. The two surveys described below are intended to address statewide impacts due to the statewide level of significance of the eligible historic district and three individually eligible National Register historic resources. The City of Des Moines preservation fund is intended to address local impacts due to the loss of the eligible historic district and three individually eligible National Register historic resources. Addressing both the statewide and local impacts is necessary due to the statewide and local significance of the historic resources.

The mitigation payment measures directly support the identification, evaluation, and retention of other historic resources, both locally and statewide. Mitigation payments are calculated as percentages of the total 2023 King County appraised value for land and property within the eligible Masonic Home of Washington Historic District. The Assessor's appraised value places a market value on the eligible historic resources. Considering mitigation payments as percentages of this value contextualizes the level of cost of mitigation payments relative to the overall market value rather than project costs in order to support the calculation of an amount commensurate with the scale and statewide and local significance of the historic resources. The full extent of the tax parcel is utilized since this is both the boundary of the eligible historic district, and that upon completion of demolition no eligible historic district or individually National Register eligible historic resources will remain. Mitigation measures include:

- Prepare Historic American Buildings Survey (HABS) Level II Documentation for the entire eligible Masonic Home of Washington Historic District with DAHP as the repository. This would provide a public record of original construction, subsequent alterations, and conditions immediately prior to removal of the resources. This would reformat background information assembled for the 2023 *Masonic Home of Washington Historic Report* per HABS standards and include copies of original drawings and high-resolution digital photographs.
- Allow salvage companies, such as SecondUse and similar, on-site prior to demolition for architectural salvage work for resale purposes to support waste stream diversion of building materials.
- Onetime mitigation payment to the City to provide funding for DAHP to undertake and fund the preparation of a statewide women's history historic context, statewide reconnaissance-level survey of at least 50 resources (new and updated historic property inventory forms), and preparation or updating of at least one National Register of Historic Places nomination. Mitigation payments are calculated as percentages of the total 2023 King County appraised value for land and improvements within the eligible Masonic Home of Washington Historic District, recorded by the Assessor as

$11,615,600. The Assessor's appraised value places a market value for the full property including both the land and the buildings. The amount to be at least 1 percent ($116,156) of the total 2023 King County appraised value for land and improvements within the eligible Masonic Home of Washington Historic District. This recognizes the importance of the eligible Masonic Home of Washington Historic District and its loss relative to women's history in Washington State. The survey contracting, management, and completion would be managed by DAHP as the entity with expertise and statewide capacity in this area.

- Onetime mitigation payment to the City to provide funding for DAHP to undertake and fund the preparation of a statewide historic context, statewide reconnaissance-level survey of at least 50 resources (new and updated historic property inventory forms), and preparation or updating of at least one National Register of Historic Places nomination for social organizations (e.g., fraternal orders and masonic organizations). The intent is to better understand the role of women and different ethnic groups in shaping social organizations within the state. This work would identify what organizations existed within the state, the role of women and different ethnic groups relative to establishing and participating in these social organizations, and the property types associated with these organizations. The amount to be at least 1 percent ($116,156) of the total 2023 King County appraised value for land and improvements within the eligible Masonic Home of Washington Historic District. This recognizes the statewide importance of the eligible Masonic Home of Washington Historic District and its loss relative to social organizations in Washington State. The survey contracting, management, and completion would be managed by DAHP as the entity with expertise and statewide capacity in this area.
- Onetime mitigation payment to the City for a dedicated preservation fund established and managed by the City of Des Moines. This fund to be used exclusively for the repair and rehabilitation of City of Des Moines owned or managed Des Moines Landmarks, Properties of Local Significance, or National Register of Historic Places-listed properties. The intent is to provide support within the City of Des Moines for the retention of historic resources used by the public. The amount to be 6 percent ($696,936) of the total 2023 King County appraised total for land and improvements within the eligible Masonic Home of Washington Historic District. This recognizes the local role of the eligible Masonic Home of Washington Historic District and its loss relative to the City.

ALTERNATIVE 2: HISTORIC PRESERVATION AND POTENTIAL FUTURE ADAPTIVE REUSE

Historic Built Environment Resources

The mothballing of existing structures on-site reduces the impacts on the historic resources over time and minimizes impacts on the eligible Masonic Home Historic District. No mitigation is required.

3.4.2 Significant Unavoidable Adverse Impacts

NO ACTION ALTERNATIVE

Historic Built Environment Resources

Significant unavoidable adverse impacts because of permanent changes to historic resources include:

- Deterioration and eventual loss of individual historic resources identified in Table 3-3 within the project area.
- Loss of the eligible Masonic Home of Washington Historic District identified in Table 3-2 due to the eventual loss of individual historic resources within the project area.

ALTERNATIVE 1: DEMOLITION ALTERNATIVE

Historic Built Environment Resources

Significant unavoidable adverse impacts because of permanent changes to historic resources include:

- Full, substantial, and partial loss of individual historic resources identified in Table 3-3 through demolition except for the eastern woods.
- Loss of the eligible Masonic Home of Washington Historic District identified in Table 3-2 through demolition of eligible contributing resources.

ALTERNATIVE 2: HISTORIC PRESERVATION AND POTENTIAL FUTURE ADAPTIVE REUSE

Historic Built Environment Resources

There are no significant unavoidable adverse impacts under this alternative.

CHAPTER 4 CULTURAL RESOURCES: ARCHAEOLOGICAL

4.1 Introduction

This *Cultural Resources: Archaeological* chapter analyzes cultural resources in the context of archaeological resources (for a discussion on cultural resources in the context of historical preservation, see Chapter 3). This chapter (1) summarizes archaeological cultural resources regulations relevant to the project, (2) describes the cultural context of the project area, (3) describes existing cultural resources within the project area, (4) reports the results of cultural resources surveys conducted in previously unevaluated portions of the project area, and (5) evaluates potential operational and construction impacts on cultural resources for each of the project alternatives.

For the purposes of this chapter, cultural resources includes archaeological sites, isolates, districts, and traditional cultural properties (TCP) that have been determined to be eligible for listing in, or may be eligible for listing in, the National Register of Historic Places (NRHP) and Washington Heritage Register, as well as cemeteries or human remains. This chapter does not address impacts on historic age built environment resources because they are described in detail in Chapter 3.

Information about existing policies and regulations is current as of the time of publication. The data on recorded cultural resources and their environmental setting were obtained from existing studies, database searches, historical maps, and historical registers. Finally, this analysis acknowledges that tribes hold complete knowledge of their history. The following section has been prepared based on published materials by non-Native people from the 19th, 20th, and 21st centuries. These materials often do not present the full and accurate understanding of tribal history and knowledge. The authors acknowledge that these

sources inherently contain deficiencies, and use of them is not intended to substitute or supersede historic knowledge held within the tribes.

4.2 Regulatory Context

Cultural resources as they relate to archaeological resources within the project area are protected by several state and local regulations, plans, and policies. These laws, regulations, and policies are presented in **Table 4-1**.

TABLE 4-1 **State Regulations and Guidelines Applicable in the Project Area**

Regulation or Policy	Description
State Environmental Policy Act (SEPA) (RCW 43.21C, WAC 197-11-330)	SEPA requires government decision-makers to consider the likely environmental consequences of a proposal and require mitigation measures.
Governor's Executive Order 21-02	Washington State Governor's Executive Order 21-02 (GEO 21-02, formerly GEO 05-05) requires agencies to consult, or delegate consultation to non-state recipients of state funds, with DAHP and affected tribes on the potential effects of projects on cultural resources proposed in state-funded construction or acquisition projects that will not undergo Section 106 review, including grant or pass-through funding that culminates in construction or land acquisitions, to determine potential effects to cultural resources. It requires that the state agency provide documentation of that consultation to DAHP.
Washington Heritage Register (Senate Bill 363; RCW 27.34.200, WAC 25-12)	Created March 19, 1971, Executive Session of the State of Washington Advisory Council on Historic Preservation and maintained by DAHP. Actions affecting resources listed in this register by any subdivision of state government or recipient of state funds must comply with SEPA and Executive Order 21-02.
Archaeological Sites and Resources (RCW 27.53)	Relates to the conservation, preservation, and protection of archaeological sites and resources.
Archaeological Site Public Disclosure Exemption (RCW 42.56.300)	Restricts the distribution of information about the location of archaeological sites to the public for the protection and preservation of those sites.
Human Remains (RCW 68.50)	Relates to the protection, management, and processes in the care of human remains.
Indian Graves and Records (RCW 27.44)	Relates to the protection, management, and processes in the care of Native American cemeteries, historic graves, and related records.
Abandoned and Historic Cemeteries and Historic Graves (RCW 68.60)	Relates to the preservation and protection of abandoned and historic cemeteries and graves including human remains.
Archaeological Excavation and Removal Permit (WAC 25-48)	Relates to the procedures of application for and review processes of archaeological excavations and removals; permits are issued by DAHP.

King County and the City of Des Moines do not have formal Historic Preservation Programs governing private development actions. Preservation programs here are guided by state laws and regulations.

4.3 Methodology

4.3.1 Existing Conditions

This section describes the methods used to analyze archaeological cultural resources within the cultural resources project area. This section is based on the work presented in the cultural resources assessment conducted for the project (Robinson-Mathes and Ferris 2023). The assessment collected information from:

- The Washington State Department of Archaeology and Historic Preservation's (DAHP's) Washington Information System for Architectural and Archaeological Records Data (WISAARD) for previously completed cultural resources studies and previously recorded archaeological, ethnographic, and historic resources located within the project area (DAHP 2023).
- Digital collections of Washington State Archives.
- Digital collections of University of Washington.
- Published ethnographic studies and historic contexts.
- Other relevant online resources and historic maps.

4.3.2 National Register of Historic Places

This report evaluates known resources under the criteria established by the National Historic Preservation Act to evaluate resources for their potential eligibility to be listed in the NRHP. For a property to qualify for the National Register, it must meet one of the NRHP criteria for evaluation by being associated with an important historic context and retaining historic integrity of those features necessary to convey its significance (NPS 1997). A discussion of historic registers is covered in Chapter 3 and also applies to archaeological resources.

4.3.3 Cultural Resources Assessment for the Project

HDR Engineering, Inc. (HDR) was retained to complete a cultural resources investigation of the project area. HDR's work included a literature review of the project area and vicinity, tribal coordination, an archaeological survey that consisted of both pedestrian and subsurface survey, and drafting a technical report with recommendations for the

Historic Registers

Historic registers are official listings of historically significant resources. The Washington State Historic Preservation Office reviews, processes, and maintains national and state register lists for Washington sites.

National Register of Historic Places (NRHP): Districts, sites, buildings, structures, and objects that have been identified and documented as being significant in American history, architecture, archaeology, engineering, or culture. These resources are found throughout the country and are at least 50 years old. Some exceptions are made for age and exceptional significance.

Washington Heritage Register: The same criteria as NRHP. This is an honorary designation, and sites that are listed on the NRHP are automatically added to the Washington Heritage Register.

Other historic registers include the Washington Heritage Barn Register and can include city and county listings.

If a resource is listed in or eligible for listing in a historic register, impacts on this resource from a project must be considered and potentially mitigated, depending on project activities.

further cultural resource work (Robinson-Mathes and Ferris 2023, included as Appendix F). Note that the work by HDR was conducted with the limits of disturbance plan prepared by the applicant in January 2023. That plan was revised October 26, 2023, to better demonstrate that the front gates and wall were proposed for demolition (as shown in Appendix B, *Demolition Plan*). Prior to fieldwork, HDR conducted a background literature review to identify previously recorded archaeological, ethnographic, and historic resources located within 1 mile (1.6 kilometers) of the project area. HDR reviewed archival records from WISAARD in June 2022 and November 2022. Historic General Land Office plats and other historic maps of the project area and surrounding area available on the internet were also reviewed. According to the DAHP predictive model, the project area has very high to high risk for containing archaeological resources. The WISAARD predictive model uses statistical methods and statewide environmental and cultural resource data by correlating locations of known archaeological sites with environmental data to determine the probability that an area may contain archaeological resources (GeoEngineers 2009). The results of the background and literature review provided information on (1) previously conducted cultural resources investigations, (2) previously recorded cultural resources, (3) previously recorded historic resources, (4) previously recorded cemeteries, and (5) previously recorded TCPs.

HDR cultural resources specialist Jennifer Ferris provided email notification of the May fieldwork on May 17, 2022, to the following Native American tribes and agencies: Duwamish Tribe, King County Historic Preservation Program (KCHPP), Muckleshoot Indian Tribe, Puyallup Tribe of Indians, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians, Suquamish Tribe, and Tulalip Tribes of Washington. Responses were received from the Duwamish Tribe, Suquamish Tribe, and KCHPP acknowledging the survey and requesting the survey results. The Snoqualmie Indian Tribe responded that they would observe the fieldwork on May 19, 2022.

Ms. Ferris provided additional email notification of the December fieldwork on December 5, 2022, to the Indian tribes and agencies who received the May notification. Responses were received from the Snoqualmie Indian Tribe and KCHPP acknowledging the survey and forthcoming report.

The pedestrian survey consisted of a visual inspection of the project area. Transects were walked east and west across the project area and were spaced approximately 50 to 66 feet (15 to 20 meters) apart. The ground surface was visually inspected during the pedestrian survey for artifacts, features, and other evidence of cultural resources.

Overview photographs were taken of the project area that included general conditions (e.g., slope and ground surface visibility) and other features within or near the project area boundary. A handheld global positioning system (GPS) Trimble Geo-7X unit that achieved submeter accuracy in the field was used during the pedestrian survey to record transects and, if observed, cultural resources.

If cultural resources were observed during the pedestrian survey, they were photographed and recorded following professional standards and left in place.

Subsurface survey of the project area consisted of the excavation of 48 shovel probes (SPs) placed in areas of higher probability for cultural resources deposits and/or areas in which there will be a higher degree of ground disturbance from proposed project activities. SPs were excavated by handheld shovels, measured approximately 40 to 50 centimeters (16 to 20 inches) in diameter, and were excavated to a maximum depth of 1 meter (3 feet) or until culturally sterile sediments (e.g., glacial sediments), impenetrable sediments, and/or cobbles were encountered. Excavated sediments were screened through a 0.25-inch mesh onto a drop cloth while being examined for cultural resources deposits. If located, archaeological resources were recorded, photographed, measured, and backfilled into the SP. No archaeological resources were observed during the survey.

Sediments were documented according to professional standards; documentation included sediment type, color, compaction, gravel content, and depth of deposit. Soil profiles and overviews of each SP were photographed before backfilling, and the location of each SP was recorded with the handheld GPS device that achieved submeter accuracy in the field.

4.3.4 SEPA Tribal Consultation

The City of Des Moines (City) informed the Duwamish Tribe, Muckleshoot Indian Tribe, Stillaguamish Tribe of Indians, Puyallup Tribe of Indians, Snoqualmie Indian Tribe, and the Tulalip Tribes of the Environmental Impact Statement (EIS) through a letter describing the current status of the project, the three alternatives, and the results of the archaeological survey. The letter also invited the tribes to share any specific comments, concerns or information that could be used as part of this chapter. To date, only the Snoqualmie Indian Tribe has provided an email response (Osbekoff 2023).

4.4 Affected Environment

This section establishes the cultural context of the project area, then provides the results of the background literature review, and the results of the archaeological survey. The information in the following sections was developed for the project as part of the cultural reroucres assesment report (Robinson-Mathes and Ferris 2023).

4.4.1 Precontact Context

The temporal timeframes used in the following discussion include regional-specific labels that represent shifts in subsistence strategies, socio-political organization, settlement and land use, and material culture within the environment of the Puget Sound, adapted within the broader phase categories used for many regions across the Pacific Northwest. The phases are divided into three sections and are discussed below as follows: the Paleo-Indian Period, the Archaic Period, and the Pacific Period.

PALEO-INDIAN PERIOD (BEFORE 12,500 YEARS BEFORE PRESENT [BP])

Much of the late Pleistocene terrain was uninhabitable as a result of glaciers, and the lands that were occupied at this time were predominately coastal reaches. Sites from this period are rare, as Paleo-Indian populations were small and highly mobile, and much of the land during this time was covered by glaciers. The earliest occupations in Western Washington at this time are known as Paleo-Indians, who were highly mobile hunter-gatherers living in small groups. These occupations are characterized by the presence of large, fluted projectile points (Ames and Maschner 1999; Carlson 1990). Paleo-Indians were also thought to be maritime-oriented, occupying coastal reaches that are now submerged due to isostatic rebound following glacial retreat (Carlson 2003; Fedje and Christensen 1999). Ocean levels rose and submerged many of these coastal sites with the commencement of the warming Holocene. Coastal sites that were not submerged have been found above the present shoreline due to various geologic processes (Fedje and Christensen 1999).

ARCHAIC PERIOD (12,500-6,400 YEARS BP)

Sites from the Archaic period, which dates from 12,500 to 6,400 years BP, are also sparse within the archaeological record (Ames and Maschner 1999; Carlson 1990). Similar to the Paleo-Indians, populations during the Archaic period were small, highly mobile, and generally concentrated along the coast and major waterways. Sea-level changes,

erosion, and dense vegetation have obscured much of the evidence for coastal occupation during this time; however, as the climate continued to warm, glaciers retreated across larger areas, thus providing the opportunity for inland expansion (Ames and Maschner 1999). Archaic sites are identifiable by the presence of large, stemmed lanceolate projectile points and bifaces with the addition of microblades in Pacific Northwest Archaic tool assemblages (Ames and Maschner 1999).

PACIFIC PERIOD (CA. 6,400-250 YEARS BP)

The Early Pacific period (6,400 to 3,800 years BP) saw an increase in the use of marine resources as well as the appearance of human burials in middens and cemeteries, more diversity in subsistence activities, and the increased use of bone, antler, and ground stone tools. Microblade technology disappeared; however, ground stone tools (e.g., celts and adze blades) appeared in the toolkit, along with diversification of chipped-stone tool forms and an increase in ornamental pieces, which appear in human burial sites and cemeteries. This shift likely represented an expansion of contact and trade with neighboring groups (Kirk and Daugherty 2007).

The Middle Pacific period (3,800 to 1,800/1,500 years BP) is marked by the appearance of long-term settlements and plank houses, intensification of salmon harvest, and a variegation in tool form and style, including fishing technologies (e.g., wooden fishing weirs and girdled/drilled net sinkers) (Ames and Maschner 1999).

The Late Pacific period (1,800/1,500 to 250 years BP) saw an increase in the use of larger woodworking tools, a decline in the use of chipped-stone tools, and an increase in funerary ritual and burial activities.

Stabilizing sea levels during this period means that Middle and Late Pacific periods are the most visible in the coastal archaeological record (Ames and Maschner 1999). The end of the Pacific period is marked by the introduction of smallpox to the region (Ames and Maschner 1999).

4.4.2 Ethnographic Context

The project area is located within the traditional territory of the Coast Salish peoples, specifically the Duwamish and the Muckleshoot Tribes, who speak Southern Lushootseed as their primary language (Haeberlin and Gunther 1930; Spier 1936).

At the time of the first Euro-American contact in the mid-nineteenth century, the Duwamish lived in 17 or more winter villages on the shoreline of Elliott Bay and nearby waterways. Their territory extended to Lake Washington, Lake Union, and Salmon Bay, and to the

Duwamish, Black, and Cedar Rivers (Duwamish Tribe 2022; Iversen et al. 2000a; Larson and Lewarch 1995; Waterman 2001). Smaller groups would form during summer for increased mobility to hunt and gather seasonal foods. Temporary fishing and plant-gathering camps were set up as needed while traveling during seasonal procurement (Suttles and Lane 1990). The Duwamish fished for salmon, cod, and halibut, and hunted game such as deer, elk, bear, and waterfowl. They collected clams and other shellfish, as well as berries, roots, camas, wapato, and other plants for food and medicinal purposes (Duwamish Tribe 2022; Suttles and Lane 1990).

The Muckleshoot lived near the Duwamish (formerly known as Green River and White River people, respectively), and they likely camped together at Elliott Bay fishing areas. At the time of Euro-American contact, the Muckleshoot occupied the Green River and upper White River areas, traveling to other areas for resource gathering. While their primary subsistence source was salmon, they also hunted game including deer, elk, and waterfowl, and collected shellfish and other marine resources from Elliott Bay, Des Moines, Redondo, and Woodmont Beach (Bernholz and Weiner 2008; Hoyt et al. 2009; Iversen et al. 2000a; Larson and Lewarch 1995; Upchurch 1941).

Both the Duwamish and the Muckleshoot would travel overland or by waterway using canoes, and both tribes have been reported to have traveled together and to have gathered resources together (Swindell 1941). The Duwamish and the Muckleshoot Tribes had close interconnections that were shaped and fortified by marriages, cultural practices, shared land, and shared resources. Complex arts and utilitarian objects developed among these groups alongside increased specialization and included carved wood utensils and household items, preserved foodstuffs, basketry, blankets, and tools. Puget Salish groups engaged in complex political, social, and economic organizations and practices, including potlatches and spirit quests (Elmendorf 1971). Groups also organized by social stratification, whereby villages consisted of elite, commoner, and slave classes (Ames 2001; Grier 2004).

Northwest Indian populations were affected by westward expansion of Euro-Americans well before initial contact in the form of disease transmission as well as the exchange of trade. Evidence of smallpox among Native communities was observed by Lewis and Clark during their journey to the Pacific Ocean from 1805 to 1806, and it is estimated that the spread of disease was occurring approximately 30 years prior to their observations (Goetz et al. 2009).

Although rapid Euro-American settling of the Puget Sound area brought significant upheaval to traditional Native subsistence practices, as well as social and political foundations, initial relations between Euro-

Americans and Native American groups were relatively peaceful. The Stevens Treaties, a series of treaties established between 1854 and 1856 by Washington Governor Isaac Stevens, significantly disrupted this accord as tribes were reorganized and tribal rights were outlined and enforced by Euro-American settlers. Tribes were consolidated both in names and locations, forcing multiple tribes into a limited number of reservations and ceding traditional tribal lands in exchange for retaining hunting and fishing rights at certain locations (Courtois et al. 1999; Richards 2005).

These conflicts eventually led to the signing of the Treaty of Point Elliott in 1855 and other treaties in the following decade (Treaty of Point Elliott 1855). These treaties effectively relinquished local Native populations of their traditional territories in return for fishing, hunting, and gathering rights as well as monetary payments and other assistance (e.g., access to education and healthcare). The Muckleshoot Reservation was established in 1857 by Governor Stevens to subdue arising conflicts. The Duwamish people, who were included in the Treaty of Point Elliott, were assigned to the Port Madison and Muckleshoot Reservations, though many chose to live outside of the reservations (Celmer 1995). The Duwamish Tribe is currently pursuing federal recognition as a tribal entity (Duwamish Tribe 2022).

4.4.3 Historical Context

The historical context of the project area is established in Chapter 3, *Cultural Resources: Historic Preservation*.

4.4.4 Background Literature Review

PREVIOUSLY CONDUCTED CULTURAL RESOURCE INVESTIGATIONS

Seventeen cultural resources investigations have been conducted within a 1-mile radius of the project area on behalf of the City of Kent, the City of Des Moines, and a variety of other agencies and developers. In 2013, Historic Preservation Northwest, conducted the only cultural resources investigation within the project area, which included a records review and limited reconnaissance survey to support proposed panel antenna replacement on the water tower located in the project area. During their survey, two historic built environment resources were recorded, including the Masonic Retirement Center of Washington and the Masonic water tower, both of which are within the current project area. No archaeological materials were recorded within the current project area during the 2013 investigation (Buehner 2013).

PREVIOUSLY RECORDED CULTURAL RESOURCES

There are four previously recorded archaeological resources located within a 1-mile radius of the project area; however, none are within the project area. These include one precontact shell midden previously determined eligible for listing in the NRHP (site 45KI00449), one unevaluated precontact shell midden (site 45KI00436), and two unevaluated precontact lithic isolates (45KI01550 and 45KI1626).

The one eligible site near the project area, site 45KI00449, is located north of the project area on the shore of the Des Moines Marina District, at the mouth of the Des Moines Creek. The site consists of partially disturbed and partially intact precontact shell midden and suggests numerous subsistence, tool manufacturing, and resource processing activities occurred at the site, representing long-term use. The site was tested after the City of Des Moines unintentionally trenched through an area of shell midden deposit during a landscape renovation project (Iversen et al. 2000b).

PREVIOUSLY RECORDED HISTORIC RESOURCES

Previously recorded historic built environment resources are discussed fully in Chapter 3, *Cultural Resources: Historic Preservation*.

PREVIOUSLY RECORDED CEMETERIES

There are no previously recorded cemeteries within 1 mile of the project area that were identified during the records review of the WISAARD database.

PREVIOUSLY RECORDED TRADITIONAL CULTURAL PROPERTIES

There was no information regarding existing or potential TCPs located within 1 mile of the project area identified during the review of the WISAARD database.

HDR, who completed this archaeological cultural resources investigation and analysis, is not aware of any known ethnographic place names within or immediately adjacent to the project area. However, there are several ethnographic place names recorded in the general vicinity of the project area (Waterman 2001), as listed below:

- qw3aʔəb – “kelp” for Bow Lake.

- xʷixʷədaluseb – "mat smoother, creaser" for a small creek on a point north of Des Moines.
- cikweb – "jerking place" for a cold and swift-flowing stream located north of Des Moines.
- baxqwab – "prairie" for an open space in the timber, which is the present location of Des Moines.
- čagwqs – "the first one in" for a small creek just south of Des Moines.
- ctcagkqs – "where a trail comes down to a beach" for the place on the western side of the river where the trail from Des Moines came over the ridge and down to the river.

There is also an ethnographic story about a boulder on the beach near Des Moines known as White Rock (Waterman 2001). An Indian canoe was also reportedly found near the Covenant Beach Bible Camp in 1932, located approximately 1.2 miles north of the project area (Sullivan 2005).

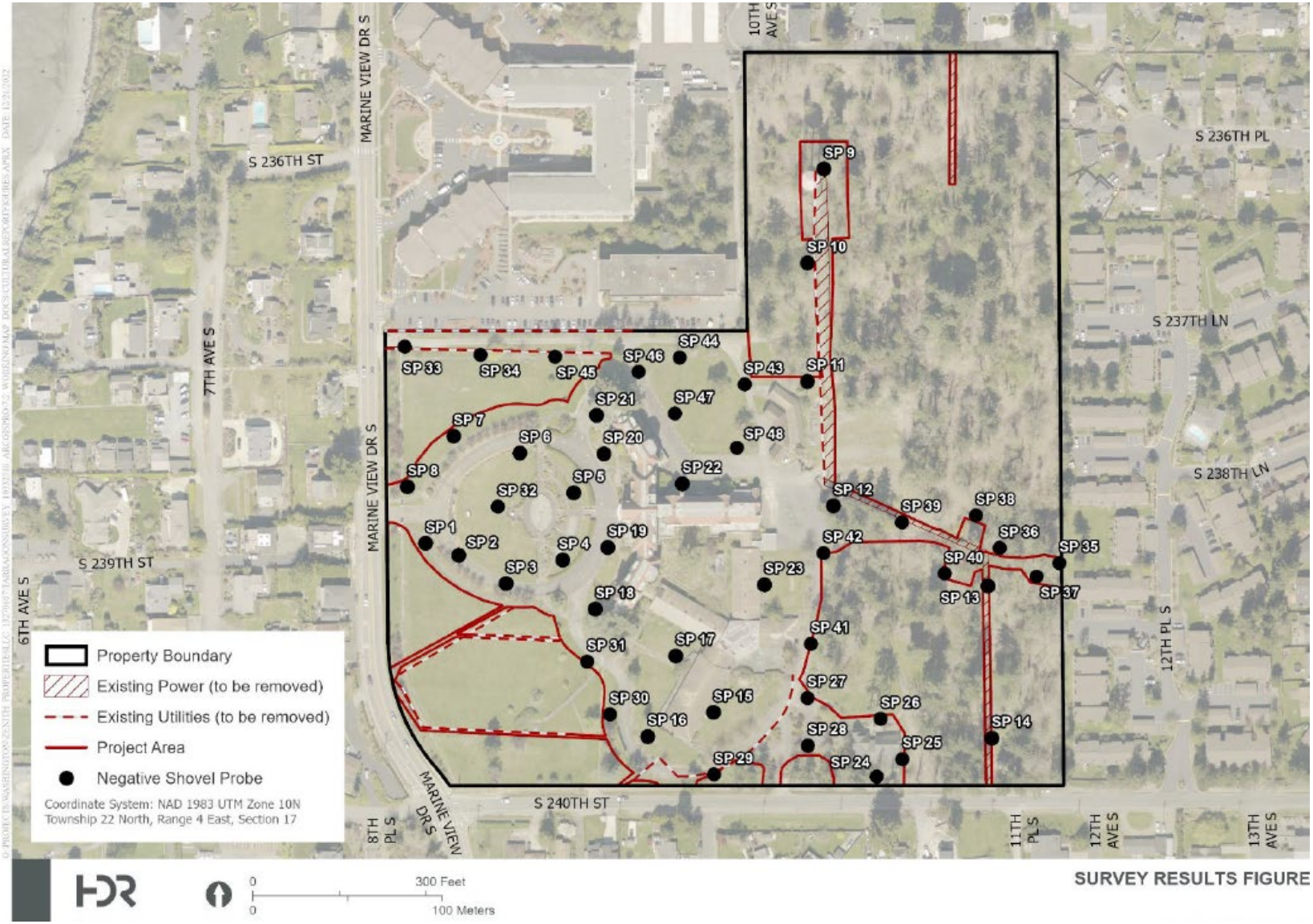
4.4.5 Archaeological Survey Results

HDR cultural resources specialists Anna Robison-Mathes and Jennifer Ferris performed the field survey on May 19, 20, and 21, 2022, and December 6 and 8, 2022. Ms. Ferris is a Registered Professional Archaeologist (RPA) and meets the Secretary of the Interior's (SOI) Professional Qualifications Standards (36 CFR Part 61) for archaeology. Snoqualmie Indian Tribe Archaeological Technician Stephen Wymer was present during the survey on May 19. The results of the field survey are summarized below. No archaeological resources were observed during the pedestrian and subsurface surveys (**Figure 4-1**).

PEDESTRIAN SURVEY RESULTS

A pedestrian survey conducted on May 19, 2022, revealed no precontact or historic-era archaeological resources within the project area. The parcel was surveyed in approximately 20-meter transects in north-to-south and east-to-west directions. Overview photographs were taken, including photos of buildings and features within the project area that are proposed for demolition.

The project area is generally flat, with an approximately 10 percent gradual west-facing slope on the western lawn, situated on the side of the parcel where the front driveway and the main entrance to the main building are located, adjacent to Marine View Drive South and South 240th Street. The project area landform was logged and graded prior to construction in the 1920s. Areas proposed for demolition were observed and include paved walkways and driveways, paved parking lots, buildings associated with the Masonic Home, overhead and underground utilities, and associated appurtenances.



SOURCE: Reproduced from Robinson-Mathes and Ferris 2023

FIGURE 4-1 **HDR Archaeological Survey Results Map**

SUBSURFACE SURVEY RESULTS

Twenty-three SPs were excavated on May 19, 20, and 21, 2022, and 25 SPs were excavated on December 6 and 8, 2022, for a total of 48 SPs spread across the project area. SPs were strategically placed in areas where a higher degree of ground disturbance will likely occur from proposed project-related activities, including the demolition of the main Masonic building and associated buildings, parking lot and driveway demolition, and removal of underground and overhead utilities and water tank. Areas where only underground utilities will be removed were not shovel probed due to the expectation that their removal will occur within their immediate footprint, and shovel probing within this footprint would be unsafe. It is anticipated that demolition activities will not disturb sediments beyond the existing backfilled utility trenches.

The SPs were excavated to depths between 28 and 80 centimeters (11 and 31 inches) and terminated when impenetrable sediment, cobbles, water, or glacial sediments were encountered.

All SPs located around the main building and driveways displayed a similar sediment profile consisting of 20 to 60 centimeters of imported and/or native fill overlying glacial sediments. Property development beginning in circa 1910 leveled and graded much of the project area, which removed much of the Holocene sediments.

Eleven SPs were located along the aboveground utility corridor and adjacent to the outdoor kitchen, outdoor restroom, and picnic area on the eastern portion of the parcel and exhibited a soil profile that included native soils to a depth of 18 to 80 centimeters overlying glacial sediments. The potential for intact archaeological materials is greatest in this location; however, much of the area was also disturbed during logging and property development and no buried surfaces were identified. The northeast portion of the project area within the utility corridor was wet with saturated soils at the ground surface and was shovel probed.

Shovel testing was not performed in areas that were inaccessible due to the presence of buildings, pavement, or buried utilities. These areas represent a significant portion of the project area that will be impacted during construction activities.

No precontact or historic cultural materials were identified during these pedestrian and subsurface surveys. Modern debris (e.g., windowpane glass, pieces of plastic, ceramic roof tile fragments, wire nails, metal bolt), non-diagnostic debris (e.g., terra-cotta or vitrified clay pipe fragments, metal fragments, bottle glass), and utilities (metal water pipe, plastic PVC pipe) were observed in 14 SPs. These materials were all

observed in the top 45 centimeters of imported fill and/or disturbed native soil, and thus do not represent intact cultural deposits. The only intact object observed during shovel probing was a single machine-made cylindrical colorless glass jar in disturbed native soils within SP 35, adjacent to the outdoor restroom building on the east side of the project area. The shape and type of the jar is consistent with topical creams or miscellaneous storage (SHA 2021). The embossed maker's mark on the base indicates that the jar was manufactured by the Northwestern Glass Company ("NW"), which was active in Seattle, Washington, between 1929 and 1987 (Lockhart et al. 2018). The base contains a plant code ("I8I") and date code ("82"). The date code indicates that the jar was manufactured in 1982, and as such, it is considered modern and does not qualify as a historic archaeological isolate.

The subsurface survey indicates that much of the project area was leveled and graded as early as circa 1910 and continuing through the mid-1900s, during which time, agricultural and business development expanded in the Des Moines area. Construction of the Masonic Home on the Property occurred between 1925 and 1926. Modern and non-diagnostic debris was observed during the subsurface survey, but do not represent intact cultural deposits.

4.5 Potential Significant Impacts

This section addresses the potential impacts on archaeological resources within the project area. There are no previously recorded archaeological resources within the project area and the results of the archaeological survey indicate that an archaeological resource is unlikely to be present within the project area. Unrecorded archaeological resources may exist within the project area and could be located underneath the existing buildings or other impervious surfaces within the project area. Potential impacts on unrecorded archaeological resources could include the inadvertent discovery of these resources during construction. When an archaeological resource is discovered in this manner, it is at an increased risk of being damaged or destroyed.

4.5.1 Impacts Methodology

Information on recorded and identified archaeological resources, cemeteries, and TCPs within the project area was identified and compared with information on the Draft EIS alternatives to assess potential impacts. Impacts are possible if construction or operations would result in removal, disturbance, grading, burial, erosion, contamination, or other ground-disturbing effects; changes in setting; and temporary and/or permanent exposure to noise, dust, and vibration.

IDENTIFICATION OF CONSTRUCTION IMPACTS

Thresholds for potential significant impacts on archaeological cultural resources were defined based on the criteria used to assess adverse impacts for cultural resources listed or eligible for listing in the NRHP and the Washington Heritage Register. Construction impacts on archaeological resources would be an irreversible and permanent impact as these resources are nonrenewable; thus, any impact on the depositional integrity (i.e., context) of a protected archaeological resource would be significant. In the State of Washington, protected archaeological resources include all precontact archaeological sites (regardless of NRHP eligibility status) and all historic sites determined eligible for listing in the NRHP. Impacts on historic resources could also be reversible or irreversible (permanent). For example, permanent impacts could occur during construction if construction activity results in structural damage to a historic resource.

For this analysis, significant construction impacts are defined as follows:

- **Significant:** Archaeological resources are nonrenewable, and any impact on the depositional integrity (i.e., context) of a protected archaeological resource would be considered a significant long-term impact. Any ground disturbance or modifications to the ground surface that impacts a protected archaeological site would be significant. Depending on the archaeological resource, impacts could be mitigated through resource-specific measures (e.g., minimizing the amount of disturbance, avoidance, documentation, or data recovery).

IDENTIFICATION OF OPERATIONAL IMPACTS

The project could potentially cause long-term (operational) impacts/changes/modifications to cultural resources as well as indirect impacts on cultural resources. For this analysis, the magnitude of long-term (operational) impacts would be the same as described for construction.

4.5.2 Impacts Common to All Alternatives

There are no known impacts on archaeological resources common to all alternatives because there are no known archaeological resources within the project area. Each of the alternatives has the potential to impact archaeological resources because each alternative could involve some level of ground disturbance within the same project footprint. When ground disturbance occurs, there is potential to encounter and potentially damage or destroy unrecorded archaeological resources.

4.5.3 No Action Alternative

The No Action Alternative would be a continuation of existing site conditions, including retention of the existing structures as vacant and unused. Over time, the No Action Alternative will result in demolition through neglect. Retaining the buildings and designed landscape without stabilization will lead to their demolition—either through determination as hazardous buildings or condemnation by the City as blighted property.

The demolition of buildings or designed landscaping will involve ground disturbance associated with the removal of unsafe structures due to neglect. If an unrecorded archaeological site is located where ground disturbance occurs, then the demolition could lead to the inadvertent discovery and potential damage or destruction of that resource. Therefore, **the potential exists for significant adverse impacts on unrecorded archaeological resources**. The impacts under the No Action Alternative are the same as Alternative 1.

4.5.4 Alternative 1: Demolition Alternative

Under Alternative 1, all existing structures and vacant buildings on-site, including the main building, infirmary wing and addition, a residential structure at the southeast corner of the site, two maintenance buildings, the on-site water tower, an outdoor kitchen, a patio, an outdoor restroom, and the fountain and associated landscape elements would be demolished. Additional work would include grading, utilities, including water, sewer, and gas.

This alternative involves a large volume of ground disturbance related to the demolition of the buildings within the project area. Additional ground disturbance that could occur within the disturbance limits includes staging, utility removal, and grading. The amount of ground disturbance that could occur under this alternative could lead to the inadvertent discovery of an archaeological resource. When an archaeological resource is inadvertently discovered, it is at a greater risk of being impacted by either being damaged or destroyed. Therefore, **the potential exists for significant adverse impacts on unrecorded archaeological resources**.

4.5.5 Alternative 2: Historic Preservation and Potential Future Adaptive Reuse Alternative

Alternative 2 assumes that Zenith preserves and structurally stabilizes the existing structures on-site and in a condition that may allow for potential future adaptive reuse. The components of the structural stabilization include foundations, structural, roofing, and exterior envelope, as well as a reasonable evaluation of the viability of applying preservation strategies to the structures. However, as identified earlier, no specific potential future uses are proposed as part of the alternative.

Under the Adaptive Reuse Alternative, no specific ground disturbance is described. However, ground disturbance could occur during the stabilization of the foundation, and underground utility repair or replacement. The limited amount of ground disturbance could still result in the inadvertent discovery of a previously unrecorded archaeological resource and is at a greater risk of being damaged or destroyed. Therefore, **the potential exists for significant adverse impacts on unrecorded archaeological resources**.

4.6 Avoidance, Minimization, and Mitigation Measures

The affected environment section of this chapter established that no archaeological resources are recorded within the project area, but there is potential for unrecorded archaeological resources within project area. The cultural context and WISAARD predictive model indicate that the project area was heavily used in the past and has high to very high risk of containing archaeological resources. However, the archaeological survey indicates that there was significant prior land clearing and development of the Property, which reduces the risk of encountering archaeological resources.

The risk of encountering unrecorded cultural resources can be reduced and mitigated if exclusionary fencing is installed prior to the beginning of any ground disturbance that occurs under any of the alternatives. The archaeological survey for the project was completed within the project area but not the entire parcel owned by the applicant. The portions of the parcel not included in the project area have not been subject to archaeological survey, and as a result are considered to have a higher risk for containing archaeological resources, as compared to the project area which has been surveyed and returned no findings. The portion of the parcel outside of the project area is largely occupied by forested lands that are less likely to have experienced significant

disturbance from past ground-disturbing actions, as compared to the project area which is in direct association with constructed features.

In its current state, there are no physical boundaries between the project area and the portions of the parcel that have not been subject to cultural resources survey. The lack of a physical demarcation of the project area creates the potential for ground disturbance to occur outside the boundary of the archaeological survey. To avoid encountering unrecorded archaeological resources, the exclusionary fencing should be installed around the boundary of the archaeological survey.

The project would also avoid, minimize, and mitigate impacts on archaeological resources by developing and implementing an inadvertent discovery plan (IDP) during construction (Appendix G). The IDP will outline the process to follow in the event of any inadvertent discoveries during ground-disturbing activities.

4.7 Significant Unavoidable Adverse Impacts

The affected environment section of this chapter established that no archaeological resources are recorded within the project area, but there is potential for unrecorded archaeological resources within project area. **The potential exists for significant adverse impacts on unrecorded archaeological resources** for the No Action Alternative, Alternative 1, Demolition, and Alternative 2, Historic Preservation and Future Adaptive Reuse.

CHAPTER 5 CONSTRUCTION IMPACTS FROM DEMOLITION

5.1 Introduction

Alternative 1, *Demolition Alternative*, involves the demolition of structures on the project site. Alternative 2, *Historic Preservation and Potential Future Adaptive Reuse Alternative*, involves no demolition. However, some limited construction activities would occur, such as structural stabilization of foundations, structural reinforcement, roofing, and resurfacing the exterior envelope. The No Action Alternative involves no construction or demolition other than maintenance.

Many scoping comments were received with concerns about potential demolition and construction impacts. Many SEPA EISs include analysis of short-term demolition or construction impacts in the discussion of each element of the environment. Since this EIS does not include elements of the environment other than cultural resources, the City made a decision to include a chapter in the EIS that provides information on demolition impacts for multiple elements of the environment, such as air quality, greenhouse gas (GHG) emissions, noise and vibration, water quality/stormwater, plants and animals, traffic, and earth and environmental health resources. This chapter is not a formal analysis of construction impacts from the alternatives in this Draft EIS, but it provides due diligence in terms of responding to scoping comments.

The City has existing regulatory and permitting protocols that applicants must adhere to that bring most potential construction and demolition impacts to below significant levels. These requirements may require Best Management Practices (BMPs) or mitigation plans.

The exception to that is that noise and vibration generated from demolition activities could expose people to, or generate, noise levels that would result in sustained annoyance and disruption of activities for sensitive receptors. This is especially true if there is crushing of building material on-site. Therefore, the potential exists for a temporary but significant unavoidable adverse demolition-related noise impact.

5.2 Scoping Comments Related to Proposed Demolition Activity

The scoping process identified the range of potential significant impacts on the built and natural environment that should be considered and evaluated in the EIS. Many of the comments received during the scoping comment period addressed concerns about the potential demolition impacts from Alternative 1 on the surrounding community.

In response to the comments received, the City decided to include this informational chapter in the EIS to provide responses to scoping comments about multiple environmental topics concerning the potential demolition impacts from Alternative 1 on the surrounding community. Specific concerns were received about potential impacts from demolition on water, air, noise, traffic, environmental health, and plants and animals. This chapter is not a formal analysis of the alternatives in this Draft EIS, but it provides the means to provide responses to these scoping comments.

5.3 Existing Setting

The project site is an approximately 27-acre corner Property bound by Marine View Drive South and South 240th Street. The setting surrounding the project site is a residential neighborhood characterized by single-family homes. That area is designated within the City's "Residential: Single Family 7,200" (RS 7,200) zoning designation, which surrounds the project site at distances of between ¼ and ¾ miles, except westward (across Marine View Drive South), which is within the "Residential: Single Family 15,000" (RS 15,000) zoning designation.

Sensitive receptors for air and noise located closest to the project site and the proposed limit of disturbance during construction are residences, a skilled nursing facility, a childcare center, and an elementary school. The skilled nursing facility and a multi-unit residential retirement complex (Judson Park) are approximately 50 and 100 feet, respectively, from the north and east (panhandle) property lines of the project site.

A multi-family planned unit development (PUD) (Hudson Ridge Condominiums) and a home childcare center (WeeCare) border the east property line of the project site, and the Des Moines Elementary School and outdoor playfield are nearly ¼ mile from the project site. Zenith Elementary is located at the northwest corner of 16th Avenue South and South 240th Street.

Single-family homes exist directly south (across South 240th Street) and west of the project site. The Puget Sound shore is approximately 600 feet directly west of the site.

5.4 Review and Response to Scoping Comments

The following sections address specific scoping comments received on elements of the environment including air quality/GHG, noise and vibration, water quality/stormwater, plants & animals, traffic, and earth and environmental health.

AIR QUALITY

Scoping Comments: Several comments were related to the potential demolition and construction impacts that would be detrimental to air quality. Themes included detrimental public health impacts from dust, debris, and possible toxic materials, dissemination of molds, fungi, asbestos, and lead, smog, diesel fumes from construction vehicles, and dust and dirt blown toward residents nearby from prevailing south-to-north winds in the project location.

Response: Des Moines is in the Puget Sound lowland, which is buffered by the Olympic and Cascade mountain ranges and Puget Sound. The Puget Sound lowland has a relatively mild, marine climate with cool summers and mild, wet, and cloudy winters. The prevailing wind direction in the summer is from the north or northwest. The average wind velocity is less than 10 miles per hour. Persistent high-pressure cells often dominate summer weather and create stagnant air conditions, which occasionally contribute to the formation of photochemical smog.

Although the Puget Sound lowland area is the most densely populated and industrialized area in Washington, there is enough wind most of the year to disperse air pollutants released into the atmosphere. If poor dispersion persists for more than 24 hours, the Puget Sound Clean Air Agency (PSCAA) can declare an “air pollution episode” or local “impaired air quality.”

Air quality is affected by pollutants that are generated by both natural and manmade sources. In general, the largest manmade contributors to air emissions are transportation vehicles and power-generating equipment, both of which typically burn fossil fuels. The main criteria pollutants of interest for land use development are carbon monoxide (CO), particulate matter (PM), ozone, and ozone precursors (volatile organic compounds, and oxides of nitrogen [NOx]). Both federal and state standards regulate these pollutants, along with two other criteria pollutants, sulfur dioxide (SO_2) and lead. However, the Puget Sound region is in attainment and not a maintenance area for ozone, nitrogen dioxide, lead, and SO_2 (EPA 2023).

Sensitive Receptors in the Study Area

Air quality does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Population subgroups sensitive to the health effects of air pollutants include the elderly and the young; populations with higher rates of respiratory disease, such as asthma and chronic obstructive pulmonary disease; and populations with other environmental or occupational health exposures (e.g., indoor air quality) that affect cardiovascular or respiratory diseases. Land uses and facilities such as schools, children's daycare centers, hospitals, and nursing and convalescent homes are more sensitive than the general public to poor air quality because the populations associated with these uses are more susceptible to respiratory distress.

Residential areas are more sensitive to air quality conditions compared to commercial and industrial areas because people generally spend longer periods of time at their residences, with proportionally greater exposure to ambient air quality conditions.

Workers are not considered sensitive receptors because all employers must follow regulations set forth by the Occupational Safety and Health Administration (OSHA) to ensure the health and well-being of their employees relative to their own operations.

The sensitive land uses nearest the project site include single-family residential uses to the west and south, multi-family residential and childcare center uses to the east, schools, and the skilled nursing facility to the north.

MITIGATION AND BMPs FOR AIR QUALITY

Work under the Demolition Alternative would follow all applicable federal, state, and local regulations for air quality and dust management, including BMPs to mitigate the impacts to below levels of

significance. Dust will be controlled during demolition using water supplied by various means. Hydrant-provided water shall be supplied to the work area and manually sprayed on work areas as needed to control fugitive dust emissions.

Additionally, high-reach excavators are equipped with plumbing that would deliver a constant stream of dust control water to the tool location, which shall always operate when work is being performed.

Lastly, the use of dust cannons shall be used to control dust during the demolition of the masonic temple. Dust cannons use a high-powered fan to aerosolize the water allowing it to better capture fine dust particles at long range and is especially efficient at neutralizing dust created during concrete and masonry demolition. The units are generally more quiet than other construction equipment that will be used at the site.

GHG EMISSIONS

Greenhouse gas emissions (GHG) are by nature cumulative and tracked at a broad scale, rather than site-specific analysis. The Washington State Department of Ecology (Ecology) estimated that in 2019, Washington produced about 102 million gross metric tons (MMT) of carbon dioxide (CO_2) equivalents (CO_2e) (Ecology 2022). (The abbreviation for “million metric tons” is MMT; thus, million metric tons of CO_2 equivalents is written as $MMTCO_2e$.) Transportation is the largest source, at 39 percent of the state’s GHG emissions, followed by residential, commercial, and industrial energy use at 25 percent, and electricity generation (both in-state and out-of-state) at 21 percent. The sources of the remaining 14 percent of emissions are agriculture, waste management, and industrial processes.

Construction-related GHG emissions would be emitted by the use of off-road construction equipment as well as by haul truck, vendor truck, and construction worker vehicle trips. Maximum annual GHG emissions would occur during the first several months of demolition (2024) totaling approximately 204 metric tons of CO_2e. For comparison, Washington’s GHG reporting threshold for facilities is 10,000 metric tons CO_2e per year. The State of Washington GHG reporting threshold applies only to stationary sources and excludes mobile sources. It is used in this analysis for reference because there is no quantitative threshold suggested by either the U.S. Environmental Protection Agency (EPA) or the State of Washington with regard to construction-related GHG emissions. No significant impacts from GHG emissions are expected from demolition activities.

NOISE AND VIBRATION

Scoping Comments: Comments discussed impacts of noise pollution, especially to vulnerable populations such as residents at Judson Park and elementary school students nearby. A few comments expressed concern about the negative impacts from increased noise to residents who may be healing or receiving medical care.

Response: The primary noise sources within the project area are vehicle traffic on Marine View Drive South and South 240th Street. Estimated traffic noise levels in the area would be akin to those for the southern terminus of State Route (SR)/WA-516, which were calculated to be 64 A-weighted decibels (dBA) at 50 feet from the roadway center, based on Washington State Department of Transportation (WSDOT) peak hour traffic data for 2022 (WSDOT 2023).

Construction activities for the Demolition Alternative would include demolition and off-hauling of material. Equipment involved with demolition at the project site would include excavators, bulldozers, and trucks for off-hauling demolition debris. No impact pile driving or blasting activities are proposed during work under the Demolition Alternative. The project would involve minimal use of hydraulic hammers only as necessary.

Table 5-1 shows typical noise levels produced by various types of construction equipment that would be involved with construction of the project, which would occur at a reference distance of 50 feet from the source. Noise levels at and near the project construction site would fluctuate depending on the particular type, number, and duration of uses of various pieces of construction equipment at any given time.

Noise Measurement Terminology

L_{eq} is defined as the steady sound pressure level that, over a given period of time, has the same total energy as the actual fluctuating noise. It is also known as the equivalent continuous sound level, or the time-averaged sound level.

The definition of **Lmax** is the maximum sound level, during a measurement period or a noise event.

Ldn stands for Day-Night Average Sound Level and is used to describe the cumulative noise exposure during an average annual day. Ldn does not represent the sound level heard at any particular time, but rather represents the total sound exposure.

TABLE 5-1 **Typical Noise Levels from Construction Equipment**

Construction Equipment	Noise Level (dBA, Lmax at 50 Feet)
Dump truck	77
Excavator	81
Dozer	82
Hoe ram (Hydraulic hammer)	90

SOURCE: FHWA 2006

A hoe ram is a precision, sharp-tipped hydraulic hammer that is fitted to a piece of mobile machinery such as a tractor, excavator, backhoe in

order to carry out heavy-duty demolition of concrete or rock surfaces, or structures.

In addition to estimating the noise increases from the operation of individual pieces of equipment as reported in the table above, the total increase in noise from the concurrent/overlapping operation of several pieces of equipment was calculated for major construction phases of the Demolition Alternative. The Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) was used to estimate noise generated by the construction activities under the Demolition Alternative. Construction noise levels were calculated for each stage of construction based on the equipment list provided by the client. Distances to receptors input into the model include lateral distance, but conservatively the model does not consider any shielding attenuation from intervening topography (see Appendix K, *Noise*).

Table 5-2 presents the results of the RCNM modeling of the demolition stage of the Demolition Alternative, showing the predicted noise levels at the nearest off-site sensitive land use. The nearest residential sensitive receptors to the project site are residences on South 240th Street, approximately 150 feet south from the center of the nearest building on the project site. Predicted noise values in Table 5-2 represent a worst-case analysis when equipment is in operation at the point of the construction site closest to the sensitive receptors, as this would occur only for a relatively short percentage of the overall construction period. As can be seen in Table 5-2, noise levels generated during the Demolition Alternatives activities at the closest sensitive receptors would be approximately 71 dBA without operation of a hydraulic hammer. Occasional use of a hydraulic hammer could further increase these noise levels by 8 dBA.

TABLE 5-2 **Daytime Noise Levels from Construction for Demolition Alternative**

Representative Receptor	Existing Daytime Noise Level (dBA L_{eq})	Loudest Two Noise Sources	Reference Noise Level at 50 feet (dBA)[a]	Distance to Receptor[b] (feet)	Usage Factor (%)	Adjusted L_{eq} Level (dBA)[c]	Exceed 90 dBA L_{eq} Daytime Standard?
DEMOLITION							
S 240th Street Residences	NA	Excavator, Rubber Tired Dozer	89.6	150	40/40	70.7	No

SOURCE: FHWA. 2006; Roadway Construction Noise Model User Guide; data compiled by Environmental Science Associates 2023.

NOTES: dBA = A-weighted decibels; L_{eq} = equivalent sound level; NA = not applicable.

a. The instantaneous maximum noise level (L_{max}) at 50 feet.
b. Distance between the approximate location of equipment and the property line of the sensitive receptor.
c. The Leq level is adjusted for distance and percentage of usage.

While demolition noise would be below the Federal Transit Administration (FTA) daytime criteria of 90 dBA Leq for residential uses, construction during daytime hours would exceed the noise standards of DMMC 18.185.050, which dictates that noise levels shall not exceed 55 dBA Ldn, or existing levels, whichever is greater. Existing noise levels are likely in the range of 60 to 65 dBA. Noise generated from demolition activities could expose people to, or generate, noise levels that would result in sustained annoyance and disruption of activities for receptors. **Therefore, the potential exists for a temporary but significant demolition-related noise impact.**

Demolition Vibration

The types of construction-related activities associated with propagation of ground-borne vibration would primarily include the use of dozers. As discussed above, no impact pile driving or blasting activities are proposed during demolition for the Demolition Alternative.

The FTA threshold for potential architectural damage due to groundborne vibrations is 0.5 inch/second peak particle velocity (PPV) for new residential structures and modern commercial buildings, and 0.25 inch/second PPV for historic and older buildings. A matrix of typical vibration levels from various construction activities with distance is presented in **Table 5-3**.

TABLE 5-3 **Vibration Levels from Construction Activity**

Equipment	Estimated PPV (inches per second)	
	At 25 Feet (reference)	At 100 Feet
Loaded Trucks	0.076	0.01
Hoe Ram (hydraulic hammer)	0.089	0.011
Large Bulldozer	0.089	0.011

SOURCE: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, 2018; FTA 2018

The use of a dozer would be the highest contributor of vibration during project construction. The nearest existing off-site building, residences on South 240th Street, are approximately 100 feet from the nearest construction area where a dozer could be used. A dozer typically generates vibration levels of 0.011 inch/second PPV at a distance of 100 feet (see Table 5-3), and at this distance vibration levels are well below the applied human annoyance and building damage threshold for the building at South 240th Street. Project vibration levels from use of a dozer at other nearby but farther set back buildings would be similar to or less than that estimated for the South 240th Street residences.

Accordingly, demolition activities on nearby buildings and receptors during construction would have a **minor (less-than-significant) impact** with respect to vibration.

MITIGATION AND BMPs FOR NOISE AND VIBRATION

- DMMC 18.185.060 requires a noise mitigation plan for projects that would exceed existing levels for residential areas. The mitigation plan must be submitted to the Planning & Building and Public Works Departments of the City for review and approval before required permits are issued to allow the project to proceed. The mitigation measure to implement a Noise Mitigation Plan is identified to address this noise impact to below levels of significance. The project must comply with the City of Des Moines noise ordinance.

In addition, the following BMPs may be implemented to address and mitigate noise on the surrounding community:

- Use of concrete processor attachments (jaw attachments) over hydraulic hammers whenever possible.
- Minimize demolition debris drop height during building demolition; additionally, minimize the size of dropped debris through careful and methodical demolition methods.
- Maintain existing vegetation to act as a natural sound barrier to properties located to the northeast and east of the site.
- Conduct work in a manner that shortens the overall duration to the maximum amount safely possible to limit total demolition duration.
- Train workers and subcontractors to use equipment in ways that minimize noise generation.

WATER QUALITY/STORMWATER

Scoping Comments: Comments were received regarding the impacts of potential demolition and construction on water, and demolition impacts on water quality from stormwater runoff.

Response: Surface water on the project site primarily comes from unpaved areas, and stormwater infiltrates into the subsurface and flows to the Puget Sound via closed conveyance pipes (Aspect 2019). Puget Sound is approximately 600 feet to the west of the project site. Much of the site is currently wooded, with impervious surfaces in the developed areas consisting of building rooftops, surface parking areas, roadways, and paths.

There is existing on-site surface water conveyance and detention system. The existing stormwater connection extends from the project site to Marine View Drive and will be protected from construction runoff.

A wetland delineation was conducted, and no wetlands were found on the project site.

The project site is not located within a 100-year floodplain (FEMA 2023).

Groundwater was encountered in borings at depths ranging from approximately 3 to 4 feet below ground surface during wet seasons (AESI 2002a). Therefore, it is possible that temporary dewatering could be necessary for below-grade structures (basements) and some utilities. This may result in changes in groundwater patterns, but since a change and need for dewatering would be temporary and follow the requirements and conditions specified any permit requirements for dewatering, the **potential impact on groundwater quality would be less than significant**.

Construction activities could result in temporary impacts on stormwater runoff quality (e.g., from erosion and sedimentation, as well as pollutants from construction equipment and construction materials). Drainage review per the Surface Water Design Manual (King County 2021) is required, and appropriate mitigation would be identified at that time.

MITIGATION AND BMPs FOR WATER QUALITY/STORMWATER

The Demolition Alternative would disturb more than 1 acre of area and is thus required to obtain a General Construction Permit (GCP) through the National Pollutant Discharge Elimination System (NPDES) program with Ecology. Adherence to this requirement will help to reduce impacts to below levels of significance. All activities that may mobilize sediment will be accompanied by appropriate sediment control BMPs. The GCP will include construction BMPs, as detailed in a construction Stormwater Pollution Prevention Plan (SWPPP).

The BMPs are developed on a project-specific basis, but typical examples of construction BMPs include the installation of silt fences, use of hay bales, covering trucks that haul soils, or application of soil stabilization measures to minimize the potential for erosion on exposed areas. The use of construction equipment on-site would increase the potential for pollutants (e.g., fuel, oil and grease, hydraulic fluid) to be transported to waters from accidental releases. Vegetation clearing, excavation, and fill placement for staging areas would expose soils and temporarily increase the potential for soil mobilization and transport to surface waters in stormwater runoff, until vegetation in disturbed areas is restored.

The SWPPP would contain BMPs to control stormwater contamination and procedures for preventing and responding to accidental spills and

would be prepared prior to construction activity at the site and implemented throughout construction. Therefore, any significant stormwater impacts are expected to be mitigated with proper mitigation/prevention through a SWPPP during construction.

The following water quality BMPs shall be applied as part of the project to reduce impacts:

- Stormwater and/or water generated during dust control operations shall be diverted from the work area. Erosion control shall be placed along the perimeter of the work area, which shall include silt fencing around all downhill sides of work areas to infiltrate drain through the soil. Also, straw wattle will be used over hardscapes and around catch basins. Additionally, all catch basins on-site shall have catch basin inserts placed inside them prior to any work taking place.
- Existing vegetation and grass outside the limits of disturbance shall be undisturbed and used as vegetative barrier along the perimeter of the project as possible.
- Existing site hardscapes and driveways within the limits of disturbance will be removed, except where used as construction traffic paths. These paths shall be kept swept and free of debris at all times to mitigate track out.
- Additional BMPs shall be used as necessary during the demolition process; and
- The project applicant or its construction contractor shall maintain a full-time Certified Erosion and Sediment Control Lead (CESCL) familiar with the project that shall perform weekly inspections of existing BMPs and make recommendations of increased BMPs.

In addition, the following standard water quality BMPs for construction will be implemented in accordance with regulatory permit requirements.

- Cleared areas shall be restored and replanted with appropriate native species to stabilize soils following construction activities.
- Implementation of proper waste handling measures shall apply to prevent spillage of building debris and releases of other construction materials.
- Pollution control measures will be implemented to ensure appropriate storage, handling, and use of petroleum products and other potential pollutants on-site during construction. Spill response materials will be maintained on-site during construction.
- Construction will be conducted in accordance with the conditions of all applicable permits issued by regulatory agencies.
- A construction SWPPP will be developed and implemented to cover all areas of work on the project site, and specify that:
  - Waste materials will be transported off-site and disposed of in accordance with applicable regulations and as noted in the SWPPP.

  - Construction entrances, wheel washes, street cleaning, and other BMPs will be used to prevent tracking soils beyond the project limits.
  - Stormwater from work areas will be kept separate from non-work areas.
  - The locations of existing inlets and catch basins will be identified in the SWPPP and the method of protection described.
  - Specify locations, protections, and covering practices for stockpiles.
  - Provide controls to prevent sediment, debris, and other pollutants from entering surface waters and drainage features.
- Develop and implement a Spill Plan to ensure that all pollutants and products are controlled and contained.
- BMPs for concrete work include the following:
  - No new concrete work is anticipated, but if required for temporary use would be covered and protected from rainfall until cured.
- Adequate material and procedures to respond to unexpected weather conditions or accidental release of materials will be available on-site.

Because the demolition activities will be conducted in accordance with BMPs contained within the required SWPPP, consistent with the NPDES GCP, and with implementation of monitoring programs, the project would result in a **less-than-significant impact on water quality for stormwater-related erosion** associated with construction activities.

PLANTS & ANIMALS

Scoping Comments: Comments were submitted regarding the potential for negative impacts from demolition and construction activities on plants and animals. Topics included loss of old-growth forest; impacts on shoreline ecosystem; bald eagles, Canadian geese (who use the Property lawns during their north to south migrations) and other birds; and coyotes, raccoons, rabbits, and other animals. Comments also noted the impact that removing trees and vegetation, and subsequently walking trails, would have on public recreation opportunities.

Response: The western 11 acres of the Property are developed and include the five-story Grand Lodge of Washington, a former assisted living and healthcare facility, and three outbuildings east of the lodge that are no longer in use. Paved access roads, parking areas, paths, hardscapes, and landscaping (e.g., lawns) are also developed features in this area. This area provides limited and low-quality wildlife habitat.

Approximately 16 acres of undeveloped woodland are in the east and northeast of the subject Property. There are also paved walking paths, outdoor cooking facilities, and lawns throughout the woodland (AESI 2002a). The woodland is surrounded by residential land use, and the nearest wooded habitat is approximately ¼ mile east, the Barnes Creek riparian area. This area provides significant tree and understory vegetation for low- to moderate-quality wildlife habitat.

A wetland delineation was conducted in September 2023 by Environmental Science Associates (ESA). See Appendix H, *Wetland Site Memorandum*. It was determined that the site has been disturbed from past access road development and stormwater management, including the excavation of a ditch along the east side of the access road that runs north-south to the water tower. The vegetation near the data plots established for the delineation did not meet wetland criteria. Additionally, no waterways or wetland mosaics were identified. In summary, no wetlands or other critical areas or buffers were found on-site (ESA 2023).

Vegetation in the developed area consists of ornamental vegetation, characterized by non-native grasses, shrubs, trees, and forbs. Types of vegetation observed include Himalayan blackberry, Oregon grape, holly, English ivy, fern species, and *Rhododendron* species (Soundview 2018; AESI 2002a).

The wooded area is a dense upland forest consisting of various conifer and deciduous trees with a native shrub and forb understory and some dense patches of blackberry vines. Tree species include alder, maple, aspen, fir, cedar, and pine species (AESI 2002b).

Fish and Wildlife

The developed areas generally provide habitat for wildlife acclimated to an urban, developed landscape. Breeding and foraging habitat is present for avian species, including species such as American robin, spotted towhee, black-capped chickadee, house finch, house sparrow, American crow, Anna's hummingbird, and dark-eyed junco. The Property is within the Pacific Flyway and provides suitable habitat for migratory bird species. Mammal species likely include opossum, raccoon, brown rat, eastern gray squirrel, and other rodent species. Vacant buildings and structures and some tree species may provide roosting habitat for bat species.

Woodland wildlife species include the same species noted above for the developed area. The woodland also provides suitable nesting and foraging habitat for red-tailed hawk, Cooper's hawk, sharp-shinned hawk, bushtit, and chestnut-backed chickadee, among others. The woodland

may provide suitable nest trees for bald eagle, given the proximity to Puget Sound and general bald eagle nest activity within the city.

There are no aquatic habitats for fish or other aquatic species on the Property.

Threatened and Endangered Species

There are no marine or freshwater threatened or endangered species on the Property, based on the absence of suitable aquatic habitat that would be managed by the National Marine Fisheries Service (NMFS). A query of the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) database tool identified the following species: North America wolverine– proposed threatened; marbled murrelet– threatened; yellow-billed cuckoo – threatened; and bull trout – threatened. However, there is no suitable habitat for these species on or adjacent to the Property; therefore, these species are not present. There are no designated critical habitats.

A query of the Washington Department of Fish and Wildlife (WDFW) Priority Habitats and Species (PHS) database provided no information for the subject parcel (WDFW 2023).

Potential impacts addressed here include demolition impacts related to the demolition and clearing of approximately 11 acres of the subject parcel. Demolition shall remain within the limits of disturbance identified on the Demolition Plan, and all on-site vegetation outside of the limits of disturbance shall be protected.

The magnitude of potential impacts on plants and animals is based on the amount of habitat disturbed or lost, including the number, location, and type of trees removed during demolition, and the proximity of construction activities to suitable or occupied wildlife habitat, sensitive plant species, and critical areas. There are no knowns critical areas on the project site.

The Demolition Alternative could cause potential impacts related to habitat alteration; interference with critical survival activities; or direct injury, death, or harassment of some species. Impacts would depend on the scale of habitat alteration (e.g., number of trees removed) or type of wildlife disturbance (e.g., noise, habitat removal, general construction activities) and impact (e.g., displacement, interference with survival activities, and direct harassment, injury, or mortality). The level of impacts would depend on the scale of impacts and the species affected (see Appendix H, *Wetland Site Memorandum*). A wetland delineation conducted on the site near the water tower concluded that the site has been disturbed from past access road development and stormwater management. While the site has been disturbed, the vegetation

communities were considered to reflect “normal” conditions. No waterways or wetland mosaics were identified, and no critical areas or buffers were found.

The primary long-term impacts of the Demolition Alternative on plants and animals are the direct and indirect effects of removing trees and vegetation. However, efforts would be made during demolition to preserve existing vegetation where possible such that there shall be no significant vegetation removal during demolition. The limits of disturbance should be marked with high-visibility fencing or other suitable means to protect trees and vegetation. Where possible, vegetation within the limits of disturbance shall not be disturbed. Vegetation adjacent to buildings would be removed.

Approximately 65 trees within the limits of disturbance have the potential to be removed or damaged (see Appendix I, *Tree Evaluation Locations*). Trees identified for removal shall be marked clearly and inventoried. Trees that are not marked for removal shall be protected to the maximum extent possible using tree protection fencing, or other means, to avoid impacts on trees. In addition, the City of Des Moines Tree Ordinance shall be implemented, and tree removal permit obtained, to protect and mitigate tree impacts. The woodland habitat is used primarily by urbanized wildlife species and migratory birds. Most trees will not be removed from the demolition limits, and the removal of trees in the woodland will be limited. Therefore, vegetation removal would result in a **less-than-significant impact on habitat**.

Noise and vibration from heavy equipment such as bulldozers and trucks could induce stress in wildlife and could cause individuals to move away or abandon the area. Most of these effects would be temporary and minor because urban wildlife species are adapted to noise and human disturbance, and wildlife would return to the site after disturbance ceases. Long-term impacts on wildlife are not expected because primarily developed areas and structures would be demolished. If demolition occurs during the nesting season, activities could result in impacts on nesting birds, including abandonment of nests and mortality or injury.

A significant impact on bald eagles is possible if bald eagles are nesting on the subject parcel within 300 feet of demolition activities. Demolition activities have the potential to cause injury, death, or harassment. Pre-construction bald eagle nest surveys shall be implemented to determine the presence of active bald eagle nests. If nests are present, implementation of the National Bald Eagle Management Guidelines (2007), including possible construction timing limitations and consultation with the USFWS and WDFW, would result in **less-than-significant impacts on nesting bald eagles**, if present.

The developed and woodland habitats are used primarily by urbanized wildlife species, and few protected wildlife species regularly occur in the study area. Although some habitat may be reduced through vegetation and tree removal, the woodlands would remain largely intact. There are no federally listed or state-listed threatened or endangered species within the demolition limits or on the adjacent parcels.

MITIGATION AND BMPs FOR PLANTS & ANIMALS

Mitigation for plants & animals to reduce impacts to below levels of significance include:

- Obtain all applicable permits for the project prior to construction. All permit conditions will be implemented.
- Survey tree species that may be removed, including species, diameter at breast height, and location.
- Implement the City of Des Moines Tree Protection Ordinance and critical areas regulations.
- Preserve and protect significant trees and vegetation using protective fencing and other methods to avoid removal or damage to the maximum extent practicable.
- Implement BMPs such as delineating disturbance limits.
- Conduct bald eagle preconstruction nest surveys within 300 feet of the project site to identify active bald eagle nests if present.
- Avoid migratory bird nesting season, generally April to mid-June, if possible.

TRAFFIC

Scoping Comments: Comments were received regarding the increased traffic that would result from demolition. Themes included the adverse impacts on community members from increased number of construction vehicles and workers traveling to and from the site, road closures impacting community members who are traveling through the area, impacts on businesses, additional traffic impacting neighbors' quality of life and local schools, and potential wear and tear or damage to streets from construction vehicles. Comments specifically mentioned concerns about impacts on 10th Avenue South, Marine View Drive South, and South 240th Street.

Response: The project is located at 23660 Marine View Drive South, at the northeast corner of the signaled intersection of South 240th Street and Marine View Drive South. Both streets are the main arterials in the area; both are two lanes (one in each direction), with the southbound approach to South 240th Street having a dedicated left-turn lane.

The project site is served directly by three driveways. Two driveways connect directly to Marine View Drive South on the west and a third connects directly to South 240th Street to the south. The closest driveways are approximately 500 to 600 feet from the South 240th Street and Marine View Drive South intersection.

King County Metro route 165 operates along Marine View Drive South. Bus stops for southbound travel exist directly opposite the main driveway from the project site, and the northbound stop is approximately 100 feet north of the main driveway.

Interstate 5 (I-5) is located approximately 1.5 miles east of the project site. Other primary roadways nearby are SR 509/Pacific Highway South, located approximately 1.2 miles east of the site, via South 240 Street, and SR/WA-516/Kent Des Moines Road located generally 0.6 miles north of the site, via Marine View Drive South.

Estimated traffic in the area would be similar to that for the southern terminus of SR/WA-516, based on WSDOT peak hour traffic data for 2022 (WSDOT 2023).

The Demolition Alternative would generate construction-period vehicle trips from trucks needed to haul materials and other debris generated from the building demolition and the removal of site elements from the project site. Vehicle trips associated with construction employees in passenger trucks and vehicle would also occur.

No changes are proposed to the existing access/egress points of the project site as part of the Demolition Alternative. Where needed, security fencing will be installed around the site with security gates to allow police and fire/emergency services access to the site.

Truck Trips

The total number of construction truck trips was calculated based on the project applicant's estimate of total volume of debris generated and the proposed size of off-haul trucks assumed, as shown in **Table 5-4**.

Up to approximately 23,000 tons of construction debris is estimated to be generated, and the debris would be disposed of at three separate deposition locations depending on the material off-hauled.

Demolition activity throughout the duration of the Demolition Alternative would vary, and so would the associated truck activity. Peak demolition activities involve no more than 10 entering and 10 exiting truck trips per hour. Over the duration of work, waste and recyclable debris generated are anticipated to be fewer than 900 truckloads of material from the site.

The following actions are proposed for the project to address and mitigate traffic on the surrounding road network.

TABLE 5-4 **Estimated Debris Volume and Truck Trips**

Material	Concrete	Soft Debris	Metals
Total Tons	20,000	2,100	275
Truck Loads	769	84	25
Truck Travel Hours	2,100	252	80
Optimal Number of Trucks	12	4	1
Trucks Trips per Hour During Peak Demo Activities	10 entering/10 exiting		
Tons per load	28	25	10
Destination	Maple Valley	Seattle	Kent

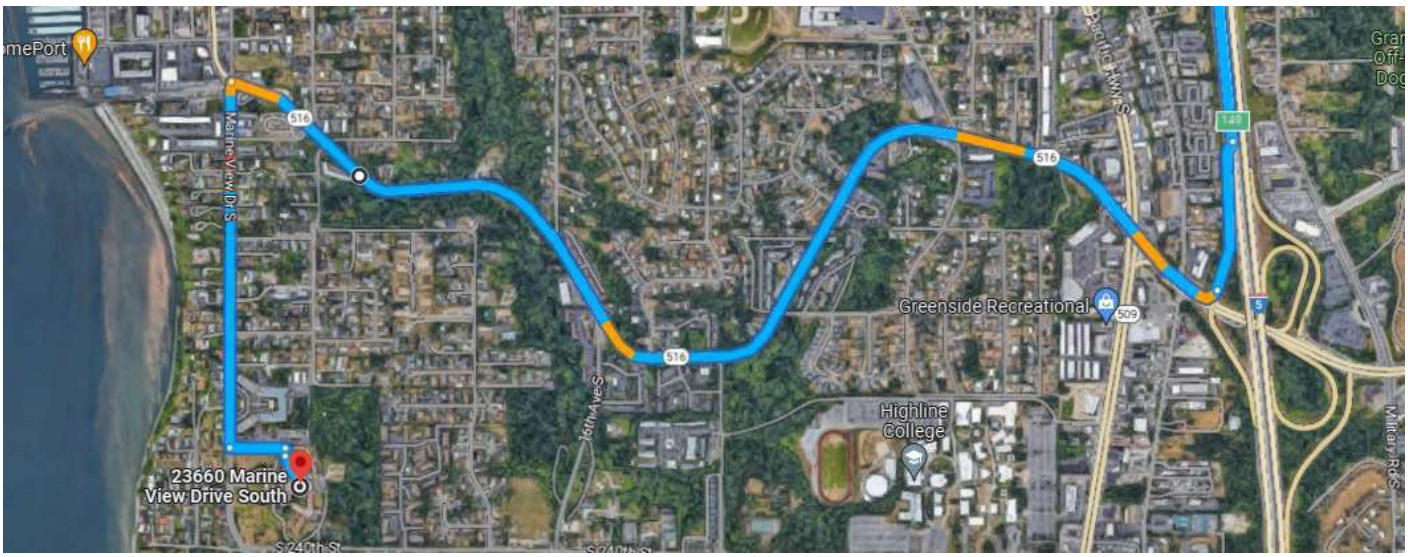
Construction Truck Routes

The largest available truck trailers will be used and will be restricted to the truck routes shown in **Figure 5-1**. During high traffic periods or for oversized loads, trucks will enter the site from I-5 (south on Pacific Highway South, west on South 240th Street) and enter the site from the south. Trucks will leave the site from the west (then north along Marine View Drive South, east on SR/WA-516 to I-5). The established construction truck route avoids left turns across traffic and congested areas. Hauling activities would generally be completed between 3 p.m. and the close of daily operation for facilities where the debris would be deposited. Special coordination may be needed to accommodate public safety for students at Zenith Elementary School located at the NW corner of 16th Avenue South and South 240th Street who are walking to and from school along South 240th Street.

As previously mentioned, the area surrounding the project site is suburban residential with low levels of vehicle traffic. There could be as many as 10 round trips per hour during peak work periods (and no trips during PM peak hours) within the project area. The increase in traffic would be noticeable to those that frequent the haul routes, but this increase would not be during AM or PM peak hours. The temporary increase in construction-related traffic is not expected to adversely impact existing traffic safety or intersection operations. The level of activity will vary throughout the construction period, which will be temporary and short-term, up to 5 to 6 months total. No staging or offloading will occur in the public right-of-way, and no lane or traffic closures are anticipated.

Special accommodations may be needed to provide safety for Zenith Elementary School at 16th Avenue South and South 240th Street.

Inbound from I-5



Outbound to I-5

FIGURE 5-1 **Proposed Construction Truck Routes**

MITIGATION AND BMPs FOR TRAFFIC

As needed, the City of Des Moines issues right-of-way use permits for short-term disruptions of pedestrian and vehicular traffic. Although such disruption is not expected to occur with the Demolition Alternative, specific mitigation measures would be incorporated into the permit to address any construction-related transportation impacts to below levels

of significance. This includes Haul Route requirements in Section 15 of the City of Des Moines Street Development Standards (Chapter 12.15 DMMC) including:

- Construction traffic routes for haul operation – physical asset assessment and monitoring (pavement condition).
- Traffic avoidance impact measures – Physical asset assessment, monitoring, and restoration.

Prior to the issuance of any demolition permits or other site altering permits, the project applicant will prepare a Construction Management Plan (CMP) that specifies measures and guidance for construction period transportation to avoid any adverse conflicts. The project applicant should coordinate with the City to prepare a project-specific CMP that includes (but is not be limited to) measures to address the following:

- Guidance on and documentation of the number and size of trucks per day entering and leaving the project site.
- Identification of arrival/departure times that would minimize traffic impacts, including hours when Zenith Elementary School is in session.
- Approved truck circulation routes.
- Locations of truck staging areas.
- Locations of employee parking and methods to encourage carpooling and use of alternative transportation.
- Methods for partial/complete street closures (e.g., timing, signage, location, and duration restrictions), if needed.
- Criteria for use of flaggers and other traffic controls.
- Preservation of safe and convenient passage for bicyclists and pedestrians across/around construction areas.
- Monitoring for roadbed damage and timing for completing repairs, if any.
- Limitations on construction activity and off-site parking restrictions during peak/holiday weekends or special events.
- A project applicant and construction manager point of contact for nearby residents and businesses to obtain construction information, have questions answered, and convey complaints.

EARTH AND ENVIRONMENTAL HEALTH

Scoping Comment: The scoping comment letter from Ecology stated that the proposed project is in an area that may have been contaminated with heavy metals due to the air emissions originating from the old Asarco smelter in north Tacoma (visit Ecology's Tacoma Smelter Plume map search tool: https://apps.wa.gov/ecy/dirtalert/).

"*Ecology recommends that the lead agency include the following as conditions of approval, prior to the issuance of any site development permits or the initiation of grading, filling, or clearing: "Sample the soil and analyze for arsenic and lead following the 2019 Tacoma Smelter Plume Guidance. The soil sampling results shall be sent to Ecology for review.*" (Ecology 2019; City of Des Moines 2022).

Response: The project site is within the affected area of the Tacoma Smelter Plume. The Phase 1 Environmental Site Assessment (Aspect 2019) prepared for the project identified the Tacoma Smelter Plume as a recognized environmental condition (REC) in connection with the project site.

Soil sampling confirmed that at two test pit locations on the project site, arsenic concentrations were 30.7 mg/kg and 33.8 mg/kg at depths of approximately 0.5 feet below ground surface. The test pits were located in the wooded area of the project site, which is consistent with Ecology's Tacoma Smelter Plume Model Remedies Guidance (Ecology 2019). These concentrations are above the Model Toxics Control Act (MTCA) Method A cleanup level of 20 mg/kg.

Excavation at the site should be careful to follow the protocol that Ecology provides for removal of soils. Soils should be sampled and disposed of in accordance with Ecology's Tacoma Smelter Plume Model Remedies Guidance to avoid and mitigate potential environmental impacts.

MITIGATION AND BMPs FOR EARTH AND ENVIRONMENTAL HEALTH

Mitigation measures to reduce impacts below levels of significance include:

- The construction contractor will be required to prepare a final Demolition Plan for City review, describing the expected type and amount of demolition wastes, proposed recycling and reuse strategies, and arrangements to coordinate the transport of the remaining waste to licensed disposal sites.
- Soil taken off-site would be tested and disposed of appropriately.
- The construction contractor will be required to develop a Contaminated Media Management Plan to address the characterization, segregation, and disposal of any contaminated soils or groundwater potentially encountered during excavation.
- Asbestos and other hazardous wastes used or encountered during construction will be properly disposed of in accordance with appropriate regulations.

5.5 Conclusion

In conclusion, most potential impacts from demolition activities would be mitigated to below a significant level of impact if the mitigation and BMPs required through the local, state, and federal permitting and regulations are implemented.

The exception to that is that the potential exists for a temporary but significant demolition-related noise impact. Existing noise levels are likely in the range of 60 to 65 dBA. Demolition activities could expose sensitive receptors to, or generate, noise levels that would result in sustained annoyance and disruption of activities for receptors. This is especially true if building materials are crushed on-site during demolition activities.

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CHAPTER 7 DISTRIBUTION LIST

TRIBES

- The Duwamish Tribe
- Kikiallus Indian Nation
- The Muckleshoot Indian Tribe
- The Puyallup Tribe of Indians
- The Snoqualmie Indian Tribe

FEDERAL

- Federal Aviation Administration
- Federal Emergency Management Agency
- U.S. Army Corps of Engineers
- U.S. Department of Housing and Urban Development
- U.S. Department of Transportation-Federal Highway Administration
- U.S. Environmental Protection Agency – Region 10

STATE

- DNR-Resource Planning & Asset Management
- WA State Department of Archaeology and Historic Preservation
- WA State Department of Commerce
- WA State Department of Ecology (SEPA)
- WA State Department of Fish and Wildlife
- WA State Department of Health
- WA State Department of Natural Resources
- WA State Department of Social and Health Services
- WA State Department of Transportation

- WA State Department of Transportation-NW Region
- WA State Parks and Recreation Commission
- WA State Recreation Conservation Office

REGIONAL

- Port of Seattle
- Puget Sound Clean Air Agency
- Puget Sound Partnership
- Puget Sound Regional Council
- Seattle-Tacoma International Airport
- Sound Transit

OTHER MUNICIPALITIES

- City of Burien
- City of Federal Way
- City of Kent
- City of Renton
- City of SeaTac
- City of Normandy Park
- King County Boundary Review Board
- King County Department of Permitting and Environmental Review
- King County Road Services
- King County Historic Preservation Program
- King County Metro Transit Environmental Planning
- King County Natural Resources and Parks
- Office of the King County Executive
- South King County Fire and Rescue
- King County Public Health Department
- King County Wastewater Treatment Division

SERVICE PROVIDERS, SCHOOLS, UTILITIES, FRANCHISE SERVICES

- Cascade Water Alliance
- CenturyLink
- Comcast Cablevision
- Federal Way Public Schools
- Highline College
- Highline School District
- Highline Water District
- Kent School District

- Lakehaven Utility District
- Midway Sewer District
- Puget Sound Energy
- Southwest Suburban Sewer District

OTHER INTERESTED PARTIES

- Mailed to property owners within a 300-foot radius of the project site
- Individuals who submitted comments during the scoping period
- Organizations who submitted comments during the scoping period
- Des Moines Agency Distribution List (e-mail)
- Zenith EIS Sign-up List (mailing and/or e-mail addresses)
- E-mails sent to City Council referencing the project
- Municipal Research and Services Center
- Washington Trust for Historic Preservation

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