

**CITY OF DES MOINES**

**ZENITH PROPERTIES BUILDING DEMOLITION**

**PERMIT APPLICATION**

**FINAL ENVIRONMENTAL IMPACT STATEMENT**

**JULY 2025**

**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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July 31, 2025

**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 of the Final Environmental Impact Statement (Final EIS) for the Zenith Properties Building Demolition Permit Application at the former Masonic Home/Landmark on the Sound.

You can access the Final EIS and other information by visiting the City of Des Moines project webpage at [www.desmoineswa.gov/zenitheis](http://www.desmoineswa.gov/zenitheis).

**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 State Environmental Policy Act (SEPA) Official 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 EIS was prepared under SEPA.

**EIS Process**

The SEPA process identifies and analyzes environmental impacts to help agency decision-makers, applicants, and the public understand how the proposal will affect the environment. 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, including mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality.

The Final EIS builds on the foundation laid for the environmental analysis in the Draft EIS, which was issued for public review and comment in January 2024. The information provided in this Final EIS does not duplicate or repeat all the information presented in the Draft EIS, except to provide context to the reader. As part of the Final EIS, the City has updated the analysis as needed, provided responses to all comments received (Appendix L), and is providing additional information in four new appendices:

- **Appendix M, Additional Information on Historic Preservation.** This is a new appendix included in the Final EIS. Following issuance of the Draft EIS and review of comments received, the City is providing additional information on historic preservation through a conceptual study of an expanded adaptive reuse scenario prepared by NW Vernacular. Expanded adaptive reuse in this context means a more flexible approach to repurposing the historic buildings for new uses while retaining their significant architectural and cultural features.
- **Appendix N, Additional Information on Historic Preservation – Landmark Site Feasibility Analysis.** This is a new appendix included in the Final EIS that provides a feasibility study prepared by Leland Consulting Group for the conceptual study under Appendix M for an expanded adaptive reuse scenario.
- **Appendix O, Additional Information on Historic Preservation – Concept Cost Plan.** This is a new appendix included in the Final EIS that provides a cost estimate prepared by DCW Cost Estimating for the conceptual study under Appendix M for an expanded adaptive reuse scenario.
- **Appendix P, Additional Information on Historic Preservation – Analysis of Potential Development on Eastern Property.** This is a new appendix in the Final EIS that provides an additional analysis prepared by EConorthwest analyzing the potential development on the eastern portion of the Property and whether such development could “cross-subsidize” the adaptive reuse of the Property.

### What Happens Next?

There is no comment period on the Final EIS. The City cannot take action on the proposal for 7 days following this notice (Washington Administrative Code [WAC] 197-11-460). The Final EIS and underlying permit decision may be appealed under SEPA (RCW 43.21C.075) and the Des Moines Municipal Code (DMMC 16.05.320). Appeals may be commenced by filing a written appeal with the City Clerk within 10 days of the date the underlying permit decision is issued (DMMC 16.05.320 and DMMC 18.240.170).

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

Thank you in advance for your time.

Sincerely,



Rebecca Deming  
Community Development Director and SEPA Official  
City of Des Moines



# FACT SHEET

# FINAL ENVIRONMENTAL IMPACT STATEMENT

## PROJECT NAME

Zenith Properties Building Demolition Permit Application

## DATE OF ISSUE OF FINAL EIS

July 31, 2025

## 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

Rebecca Deming

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 Final 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.

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## DRAFT EIS PUBLIC COMMENT PERIOD

The City of Des Moines requested comments from the public, agencies, tribes, and all interested parties on the Draft EIS during a 60-day public comment period from January 9 to March 8, 2024. Comments were accepted via the following methods:

- Online at [desmoineswa.gov/zenitheis](https://desmoineswa.gov/zenitheis)
- Mailed comments were sent to:
  - City of Des Moines
  - Attn: SEPA Official (LUA2019-0032)
  - 21630 11th Avenue S, Suite D
  - Des Moines, WA 98198
- Comments were accepted at a virtual public meeting on January 31, 2024, at 6 p.m.
- Appendix L, *Response to Comments on the Draft EIS*, includes responses to comments received on the Draft EIS.

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## DOCUMENT AVAILABILITY

The Final EIS and additional project-related information are available online at the Des Moines Community Development Department webpage: [www.desmoineswa.gov/zenitheis](https://www.desmoineswa.gov/zenitheis).

For questions about the project, email [ZenithEIS@desmoineswa.gov](mailto:ZenithEIS@desmoineswa.gov).

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

<p>City Hall 21630 11th Avenue S, Suite D Des Moines, WA 98198</p>	<p>Des Moines Public Library 21620 11th Avenue S Des Moines, WA 98198</p>	<p>Woodmont Public Library 26809 Pacific Hwy S Des Moines, WA 98198</p>
<p>* Open 9 a.m. to 4 p.m. on Monday – Friday.</p>	<p>* 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.</p>	<p>* 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).</p>



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## TIMING OF ADDITIONAL ENVIRONMENTAL REVIEW

This EIS was prepared in accordance with Washington Administrative Code (WAC) 197-11-560. After the Draft EIS comment period concluded, the City of Des Moines (Lead Agency) and consultant team reviewed and responded to comments. The Final EIS contains the responses to the comments (see Appendix L, *Response to Comments on the Draft EIS*).

The City of Des Moines anticipates making a demolition permit decision after the Final EIS is issued.

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# CONTENTS

	PAGE
<b>Fact Sheet .....</b>	<b>FS-1</b>
<b>Abbreviations .....</b>	<b>v</b>
<b>CHAPTER 1 Introduction and Summary.....</b>	<b>1-1</b>
1.1 Introduction .....	1-1
1.2 Organization of the Final EIS.....	1-1
1.3 Summary .....	1-3
1.4 Project Background and Historic Use of the Property.....	1-3
1.5 Project Objectives .....	1-4
1.6 Project Area.....	1-4
1.7 SEPA Process and Public Involvement.....	1-8
1.7.1 Environmental Review Process .....	1-8
1.7.2 Scoping.....	1-8
1.7.3 Draft EIS Comment Process .....	1-9
1.7.4 Final EIS .....	1-9
1.8 Additional Analysis in the Final EIS .....	1-12
1.9 Alternatives Evaluated in the Draft EIS .....	1-13
1.9.1 No Action Alternative.....	1-13
1.9.2 Alternative 1: Demolition Alternative .....	1-13
1.9.3 Alternative 2: Historic Preservation and Potential Future Adaptive Reuse Alternative.....	1-13
1.10 Summary of Impacts, Potential Mitigation Measures, and Key Findings.....	1-14
1.11 Significant Unavoidable Adverse Impacts....	1-28
1.11.1 No Action Alternative.....	1-28
1.11.2 Alternative 1: Demolition Alternative .....	1-28



1.11.3 Alternative 2: Historic Preservation and Potential Future Adaptive Reuse Alternative.....1-29

1.12 Benefits and Disadvantages of Delaying the Proposal .....1-29

1.13 Significant Areas of Controversy and Uncertainty .....1-30

1.14 Issues to Be Resolved.....1-30

**CHAPTER 2 Alternatives ..... 2-1**

2.1 Description of Alternatives .....2-1

2.1.1 No Action Alternative .....2-1

2.1.2 Alternative 1: Demolition Alternative .....2-4

2.1.3 Alternative 2: Historic Preservation and Potential Future Adaptive Reuse Alternative .....2-7

**CHAPTER 3 Cultural Resources: Historic Preservation ..... 3-1**

3.1 Updates to the Draft EIS .....3-1

**CHAPTER 4 Cultural Resources: Archaeological..... 4-1**

4.1 Updates to the Draft EIS .....4-1

**CHAPTER 5 Construction Impacts from Demolition ..... 5-1**

5.1 Updates to the Draft EIS .....5-1

**CHAPTER 6 References ..... 6-1**

**CHAPTER 7 Distribution List ..... 7-1**

**CHAPTER 8 Corrections and Clarifications ..... 8-1**



APPENDICES (INCLUDED WITH THE DRAFT EIS)

- Appendix A Determination of Significance
- Appendix B Demolition Plan
- Appendix C Scoping Summary Report
- Appendix D Historic Report
- Appendix E Feasibility Analysis Report
- Appendix F Cultural Resources Investigation Report
- Appendix G Inadvertent Discovery Plan
- Appendix H Wetland Site Memorandum
- Appendix I Tree Evaluation Locations
- Appendix J Air Quality and Greenhouse Gas Emissions Calculations
- Appendix K Noise

APPENDICES (INCLUDED WITH THE FINAL EIS)

- Appendix L Response to Comments on the Draft EIS
- Appendix M Additional Information on Historic Preservation (Northwest Vernacular, Inc.)
- Appendix N Additional Information on Historic Preservation – *Landmark Site Feasibility Analysis* (Leland Consulting Group 2024)
- Appendix O Additional Information on Historic Preservation – *Concept Cost Plan, City of Des Moines Masonic Home of Washington (Zenith)* (DCW 2024)
- Appendix P Additional Information on Historic Preservation – *Zenith - Analysis of Potential Development on Eastern Property* (ECONorthwest 2024)

FIGURES

- FIGURE 1-1 Vicinity and Site Map .....1-6
- FIGURE 1-2 Former Lodge (Main Building) Structure .....1-7
- FIGURE 2-1 Vicinity and Site Map .....2-3

TABLES

- TABLE 1-1 Summary of Potential Impacts and Mitigation Measures.....1-15
- TABLE 2-1 Estimated Debris Volume and Truck Trips per Hour.....2-6



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# ABBREVIATIONS

Abbreviations and acronyms used in the Draft EIS and Final EIS are presented below.

Abbreviation	Definition
AICP	American Institute of Certified Planners
BMPs	best management practices
BP	Before Present
CESCL	Certified Erosion and Sediment Control Lead
CFR	Code of Federal Regulations
City	City of Des Moines
CMP	Construction Management Plan
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	CO <sub>2</sub> 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



Abbreviation	Definition
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GCP	General Construction Permit
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 <sub>2e</sub>	million metric tons of carbon dioxide equivalent
MTCA	Model Toxics Control Act
NA	not applicable
NBBJ	Naramore, Bain, Brady & Johanson
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NO <sub>x</sub>	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



Abbreviation	Definition
PM	particulate matter
PPV	peak particle velocity
PSCAA	Puget Sound Clean Air Agency
PUD	planned unit development
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 <sub>2</sub>	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
UST	underground storage tank
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 INTRODUCTION AND SUMMARY

## 1.1 Introduction

The City of Des Moines (City) has prepared this Final Environmental Impact Statement (Final EIS) to analyze the potential environmental impacts from a proposed project (also called the proposed action, or proposal) to demolish the former Masonic Home/Landmark on the Sound property at 23660 Marine View Drive South (hereafter referred to as the Property). The project site is currently owned by Zenith Properties LLC (Zenith), the applicant. The Draft EIS was issued on January 9, 2024. The City is now issuing the Final EIS, which includes responses to comments received on the Draft EIS.

## 1.2 Organization of the Final EIS

The Final EIS builds on the foundation laid for the environmental analysis in the Draft EIS. The Draft EIS is a companion document to this Final EIS, and it is incorporated by reference (Washington Administrative Code [WAC] 197-11-635). The information provided in this Final EIS does not duplicate or repeat all the information presented in the Draft EIS, except to provide context to the reader. The Final EIS is organized as follows:

- **Chapter 1, *Introduction and Summary*.** This chapter is provided in the Final EIS with updates to the information and analysis presented in the Draft EIS.
- **Chapter 2, *Alternatives*.** This chapter is provided in the Final EIS, but required no substantive updates from the Draft EIS.
- **Chapter 3, *Cultural Resources: Historic Preservation*; Chapter 4, *Cultural Resources: Archaeological*; and Chapter 5, *Impacts from Construction and Demolition*.** The analysis and information contained in the Draft EIS for these elements of the environment are



incorporated by reference and not repeated here. Please refer to the Draft EIS for details on the Affected Environment, Impacts, and potential Mitigation Measures.

Draft EIS comments indicated there was an interest in learning more about historic preservation options for the Property. Based on this interest, the City conducted additional analysis on an expanded adaptive reuse scenario. Information about the additional analysis is summarized in Chapter 3 and detailed in Appendices M, N, O, and P of the Final EIS. The mitigation measures identified in Draft EIS Section 3.4.1, *Mitigation Measures Specific to Each Action Alternative, Alternative 1: Demolition Alternative, Historic Built Environment Resources*, have been replaced with new mitigation measures in Final EIS Section 3.1 and are included in Table 1-1 under *Cultural Resources – Historic Preservation*. Chapters 4 and 5 did not require any updates.

- **Chapter 6, References.** This chapter is provided in the Final EIS and includes minor updates based on comments received on the Draft EIS and any new material in the Final EIS.
- **Chapter 7, Distribution.** This chapter is provided with updates to include individuals and organizations that provided comments during the Draft EIS comment period.
- **Appendices A through K** included in the Draft EIS are incorporated by reference and not repeated in the Final EIS. The reader should refer to both the Draft EIS and the Final EIS documents in order to obtain all the information analyzed during the EIS process.
- **Appendix L, Responses to Comments on the Draft EIS.** This is a new appendix included for the Final EIS.
- **Appendix M, Additional Information on Historic Preservation.** This is a new appendix included in the Final EIS. Following issuance of the Draft EIS and review of comments received, the City is providing additional information on historic preservation through a conceptual study of an expanded adaptive reuse scenario prepared by NW Vernacular.
- **Appendix N, Additional Information on Historic Preservation – Landmark Site Feasibility Analysis.** This is a new appendix included in the Final EIS that provides a feasibility study prepared by Leland Consulting Group for the conceptual study under Appendix M for an expanded adaptive reuse scenario.
- **Appendix O, Additional Information on Historic Preservation – Concept Cost Plan.** This is a new appendix included in the Final EIS that provides a cost estimate prepared by DCW Cost Estimating for the conceptual study under Appendix M for an expanded adaptive reuse scenario.
- **Appendix P, Additional Information of Historic Preservation – Analysis of Potential Development on Eastern Property.** This is a new appendix included in the Final EIS that provides an analysis prepared by ECONorthwest for a conceptual study of an expanded adaptive reuse scenario.



## 1.3 Summary

Chapter 1 presents the project background and objectives; project location; an overview of alternatives; review of the State Environmental Policy Act (SEPA) process; discretionary approvals that the City is seeking from agencies; elements of the environment addressed in or excluded from the EIS; and a summary of impacts, potential mitigation measures, and significant unavoidable adverse impacts. Chapter 1, *Introduction and Summary*, also includes a discussion of benefits and disadvantages of delaying action on the proposal, areas of controversy, and issues to be resolved. Additional information appears in the appendices in the Draft EIS, which are not repeated in the Final EIS document.

## 1.4 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. The City of Des Moines has deemed the building not safe for use due to fire safety requirements.

In 2019, the Freemasons of Washington submitted a demolition permit application as part of the sale of the Property. After the Property was purchased, the demolition permit was transferred to Zenith Properties LLC to remove all structures of the former Masonic Home on their Property. The demolition permit is put on hold during the SEPA process. The SEPA process is under permit number LUA2019-0032 and includes demolition of structures that are eligible for listing in the state and national registers (Zenith 2022). The structures on the Property were removed from the City of Des Moines Historical Properties historic property survey on November 30, 2022, pursuant to the applicant's request.

The City of Des Moines is the SEPA Lead Agency 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 Draft EIS Appendix A, *Determination of Significance*). The City has prepared this Final 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. Development plans are not required to be submitted for environmental review of a demolition permit. The EIS process for the demolition permit application meets the due diligence requirements of SEPA under WAC 197-11. If development is proposed in the future, appropriate environmental review would be conducted under SEPA and/or other relevant regulations. All structures proposed to be demolished are located on King County tax parcel 1722049023. An applicant-provided Demolition Plan is included as Draft EIS Appendix B, *Demolition Plan*.

## 1.5 Project Objectives

Zenith has submitted a demolition application as a private property owner on a privately owned piece of land (proposed action). 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.

For photos and a description of the condition of the existing structures, see Draft EIS Appendix D, *Historic Report*.

## 1.6 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 the following:

- **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. An infirmary wing 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 on the Property. 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 Property constructed in 1926 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. A photograph of the main building structure is shown on **Figure 1-2**.



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



## 1.7 SEPA Process and Public Involvement

### 1.7.1 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 for this project.

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 commented on the project during two stages of the EIS process:

- **Scoping Stage (Completed):** Scoping is the first step in the EIS process. The City issued a Determination of Significance on July 27, 2022, for the project, which is provided in Draft EIS Appendix A.
- **Draft Environmental Impact Statement (Draft EIS) Stage (Completed):** The Draft EIS, released in January 2024, analyzed 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 were 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.

This document is the Final EIS, the last step in the SEPA EIS needed to complete the environmental review of the proposed project.

### 1.7.2 Scoping

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. Scoping results are described in Chapter 1, *Summary*, of the Draft EIS and are not repeated here.

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 Draft EIS Appendix C, *Scoping Summary Report*.

### 1.7.3 Draft EIS Comment Process

The Draft EIS identified environmental conditions, potential impacts, and measures to reduce or mitigate any unavoidable adverse impacts that could result from the proposed project. The City of Des Moines requested comments from the public, agencies, tribes, and all interested parties on the Draft EIS during a 60-day public comment period from January 9 to March 8, 2024. Written comments were accepted online and via mail. Verbal comments were accepted at a virtual public meeting on January 31, 2024, at 6 p.m.

A total of 314 emails, letters, or verbal comments were received, and within that amount, more than 728 individual comments are responded to in this Final EIS in Appendix L, *Response to Comments on the Draft EIS*.

### 1.7.4 Final EIS

This document is the Final EIS and includes responses to public comments received during the Draft EIS comment period. Following the EIS process, the City will make a decision on the demolition permit application.

This Final EIS was prepared pursuant to the SEPA Rules (WAC 197-11), Chapter 16.05 of the Des Moines Municipal Code (DMMC), and Chapter 43.21C RCW. This project-level Final 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 Final 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 proposal include the following:

- City of Des Moines Demolition Permit.
- City of Des Moines Right-of-Way Permit.
- City of Des Moines Grading Permit.
- City of Des Moines Tree Removal 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.

The following are included as appendices to the Draft EIS document (Appendices A through K) and are not repeated in the Final EIS:

- **Appendix A, *Determination of Significance*.** The City issued the SEPA Threshold Determination on May 3, 2022, and a copy is provided in the 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 Feasibility Analysis Report was prepared by EConorthwest, at the request of Zenith Properties LLC and presented to the City for review. It is found in the May 22, 2023, *Zenith Properties LLC Des Moines Masonic Lodge Economic Feasibility Analysis*. Information is summarized below in Exhibit 1, *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**

	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
<b>Yield on cost</b>	<b>1.00%</b>	<b>1.15%</b>	<b>0.98%</b>	<b>1.78%</b>
<b>Yield Target Performance</b>	<b>-500.0%</b>	<b>-421.7%</b>	<b>-512.2%</b>	<b>-321.3%</b>
<b>Subsidy needed</b>	<b>-\$107.25 million</b>	<b>-\$103.85 million</b>	<b>-\$128.75 million</b>	<b>-\$119.30 million</b>
<b>Subsidy needed after incentives</b>	<b>-\$50.78 million</b>	<b>-\$47.4 million</b>	<b>-\$62.45 million</b>	<b>-\$52.99 million</b>
<b>Subsidy needed after incentives (assuming lower stabilization costs)**</b>	<b>-\$44.69 million</b>	<b>-\$41.3 million</b>	<b>-\$56.36 million</b>	<b>-\$46.89 million</b>

SOURCE: ECONorthwest, 2022

\* 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. The applicant retained HDR 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 in the Draft EIS 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 identifies 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 removal, 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 air quality analysis in the construction impacts chapter are provided in this appendix.
- **Appendix K, *Noise*.** Construction noise model outputs conducted by ESA for the construction noise analysis in the construction impacts chapter are provided in this appendix.

The following is a new appendix in the Final EIS document:

- **Appendix L, *Response to Comments on the Draft EIS*.** Includes responses to comments received on the Draft EIS.

## 1.8 Additional Analysis in the Final EIS

The City reviewed the comments on the Draft EIS. There was interest in learning more about historic preservation options for the Property. Based on this interest, additional analyses were conducted on historic preservation options, and that information is included in the Final EIS in Appendices M, N, O, and P.

- **Appendix M, *Additional Information on Historic Preservation*,** is an expanded adaptive reuse scenario prepared by NW Vernacular and developed around the use of the Federal Historic Tax Credit and the State Special Tax Valuation programs, additions to and adaptive reuse of the main building, and building of infill multiple-family development in the eastern woods in a manner that retains historic district eligibility in order to utilize the Federal Historic Tax Credit program.
- **Appendix N, *Additional Information on Historic Preservation – Landmark Site Feasibility Analysis*,** is the feasibility study prepared by the firm Leland Consulting Group of the expanded adaptive reuse scenario using the additional information provided in Appendices M, O, and P, which concluded that such a proposal would be infeasible.
- **Appendix O, *Additional Information on Historic Preservation – Concept Cost Plan*,** is the cost estimation prepared by the firm DCW Cost Estimating for the expanded adaptive reuse scenario described in Appendix M. Whether the costs associated with an adaptive reuse could be considered reasonable or feasible to the applicant or not is beyond the scope of this EIS but is presented as supporting documentation for the additional analysis.
- **Appendix P, *Additional Information on Historic Preservation – Analysis of Potential Development on Eastern Property*,** is an additional analysis prepared by ECONorthwest, at the request Zenith Properties LLC, analyzing the potential development on the eastern portion of the Property and whether such development could “cross-subsidize” the adaptive reuse of the Property.



## 1.9 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. Three alternatives—a No Action Alternative and two Action Alternatives—were evaluated in the Draft EIS and were not revised in the Final EIS. No additional alternatives were evaluated; however, in response to comments to the Draft EIS, the City conducted additional analysis on historic preservation presented in Final EIS Appendices M, N, O, and P. The alternatives are summarized below and described in detail in Chapter 2, *Alternatives*.

### 1.9.1 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. The No Action Alternative is a requirement under SEPA rules. Under No Action, there would be a continuation of existing site conditions, including retention of the existing structures as vacant and unutilized.

### 1.9.2 Alternative 1: Demolition Alternative

Alternative 1 assumes demolition of all existing structures and vacant buildings on-site, including the main building and infirmary wing, the duplex model home structure at the southeast corner of the site, two maintenance buildings, 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. Work would result in substantial demolition of the central oval, west, and north lawns. Additional work would include removing existing building foundations and utilities, including water, sewer, and gas. See Chapter 2, *Alternatives*, of the Draft and Final EIS for additional information.

### 1.9.3 Alternative 2: Historic Preservation and Potential Future Adaptive Reuse Alternative

Alternative 2 assumes that Zenith preserves and structurally stabilizes all of the existing historic resources on-site 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.

## 1.10 Summary of Impacts, Potential Mitigation Measures, and Key Findings

This section summarizes the results of the environmental evaluation of alternatives further detailed in Chapters 2 through 5 of the Draft and Final EIS documents. 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 Draft EIS and Final EIS 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 Potential Future Adaptive Reuse
<b>CULTURAL RESOURCES – ARCHAEOLOGICAL</b>			
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 (Draft EIS Appendix G, <i>Cultural Resources Inadvertent Discovery Plan</i> ). The IDP will identify the process to follow in the event of any inadvertent discoveries during ground-disturbing activities.	Same as No Action	Same as No Action
<b>CULTURAL RESOURCES – HISTORIC PRESERVATION</b>			
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 would result in the deterioration and eventual loss of the historic resources within the project area due to neglect, the impact of natural forces, including exposure to the elements, and the impact of human-driven forces. These all increase the severity of one another. Maintenance would only occur 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	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 Draft EIS Table 3-3 would be fully or substantially demolished. The exceptions to this are the partial demolition of the eastern woods. The demolition work would result in a loss of integrity for the eligible Masonic Home of Washington Historic District identified in Draft EIS 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. The demolition work would result in the loss of two resources individually eligible for listing or designation in a historic	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 renewing temporary protective measures as needed.



	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Potential Future Adaptive Reuse
	<p>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 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 Draft EIS 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. <b>Impacts would be significant.</b></p>	<p>register—the individually eligible main building and water tower, and loss of the eligible historic district through demolition of contributing resources. <b>Impacts would be significant.</b></p> <p>No potential operational impacts over time are anticipated since resources would have been removed and no ongoing activity is identified for the Property.</p>	
Measures to reduce or eliminate impacts	<p>Vacant buildings and land in Des Moines must comply with the IPMC and 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. IPMC Section 301.3 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.</p>	<p>The following revised mitigation measures are proposed as part of this Final EIS. The intent is for 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, two of which are also individually National Register eligible.</p> <ul style="list-style-type: none"> <li>• Prepare Historic American Buildings Survey (HABS) Level II Documentation for the entire eligible Masonic Home of Washington Historic District with the Washington 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 information assembled for the 2023 Masonic Home of Washington Historic Report</li> </ul>	<p>No mitigation is required.</p>



	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Potential Future Adaptive Reuse
		<p>per HABS standards and include copies of original drawings and high-resolution digital photographs.</p> <ul style="list-style-type: none"> <li>• Allow salvage companies, such as Second Use and similar, on-site prior to demolition for architectural salvage work for resale purposes to support waste stream diversion of building materials, including stained glass, leaded light windows, light fixtures, marble and wood finishes, and decorative metal work. Recommend that salvage companies work directly with historical societies and agencies to identify and select features that may be of interest to them.</li> <li>• One-time payment of \$1,161,560 to a dedicated preservation fund established and managed by the City of Des Moines. This fund would 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 intent is also to address the local impacts due to the loss of the eligible Masonic Home of Washington Historic District and two individually eligible National Register historic resources.</li> <li>• If the Property is redeveloped, the applicant shall provide an on-site location for an appropriately scaled (approximately 5,000- to 10,000-square-foot) historical interpretation installation that is continually maintained to share the site's history that shall be publicly accessible adjacent to Marine View Drive, or another location that is mutually agreeable to the applicant and City. The installation may include landscaping, signage, seating, photographs, re-</li> </ul>	



	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Potential Future Adaptive Reuse
		<p>installation of salvaged features, and other design elements at the applicant's costs, as mutually agreed upon by the applicant and City. The City will review and approve the installation administratively, provided however the City shall hold a public meeting to receive public comment regarding the installation. Notice of this condition shall be recorded on title.</p>	
<b>CONSTRUCTION IMPACTS – NOISE AND VIBRATION</b>			
Impacts	None	<p><b>Noise:</b> 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.</p> <p><b>Vibration:</b> 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 would also have a temporary adverse impact on nearby sensitive receptors.</p>	Less than Alternative 1



	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Potential Future Adaptive Reuse
Measures to reduce or eliminate impacts	None	<p>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 &amp; 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.</p> <p>Prior to the issuance of the demolition permit, the 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 the City’s Planning, Building, and Public Works Departments for review and approval. The project must comply with the City of Des Moines noise ordinance.</p> <p>BMPs during demolition may include:</p> <ul style="list-style-type: none"> <li>• Use of concrete processor attachments (jaw attachments) over hydraulic hammers whenever possible.</li> <li>• Processing of concrete debris (including rock crushing) prior to removal from the site to limit noise caused during loading of trucks.</li> <li>• Minimize demolition debris drop height during building demolition; also minimize the size of dropped debris through careful and methodical demolition methods.</li> <li>• Maintain existing vegetation to act as a natural sound barrier to properties located to the northeast and east of the site.</li> </ul>	None



	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Potential Future Adaptive Reuse
		<ul style="list-style-type: none"> <li>Conduct work in a manner that shortens the overall duration to the maximum amount safely possible to limit total demolition duration.</li> <li>Train workers and subcontractors to use equipment in ways that minimize noise generation.</li> </ul>	
<b>CONSTRUCTION IMPACTS – AIR QUALITY AND GREENHOUSE GAS EMISSIONS</b>			
Impacts	None	<b>Air:</b> 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	<p>Work under the Demolition Alternative shall 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 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:</p> <ul style="list-style-type: none"> <li>Control dust 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.</li> <li>Equip high-reach excavators 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.</li> <li>Use dust cannons 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.</li> </ul>	None



	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Potential Future Adaptive Reuse
<b>CONSTRUCTION IMPACTS – EARTH AND ENVIRONMENTAL HEALTH</b>			
Impacts	None	<p><b>Erosion and Sedimentation (Stormwater):</b>                      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).</p>	Less than Alternative 1
Measures to reduce or eliminate impacts	None	<p><b>Soils:</b> Temporary erosion and sediment control measures and BMPs will be implemented to limit sediment inputs to receiving waters during and after construction.</p>	None
	None	<p><b>Hazardous Materials:</b> Demolition of existing structures could disturb asbestos-containing materials where present. Asbestos-containing materials would be removed during demolition.</p> <p><b>Contamination:</b> Soils impacted by the Tacoma Smelter Plume may be in the area of excavation during the demolition activities.</p> <p>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.</p> <p>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 Washington Department of Ecology (Ecology) Clean-Up guidance.</p>	None



	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Potential Future Adaptive Reuse
<b>CONSTRUCTION IMPACTS – PLANTS AND ANIMALS</b>			
Impacts	None	<p><b>Eagles:</b> 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.</p> <p><b>Trees:</b> Approximately 65 trees within the limits of disturbance have the potential to be removed or damaged (see Draft EIS Appendix I, <i>Tree Evaluation Locations</i>). The trees proposed for removal are shown in red.</p> <p><b>Other Vegetation:</b> The primary long-term impacts of the Demolition Alternative on plants and animals are the direct and indirect effects of removing trees and other vegetation.</p>	None
Measures to reduce or eliminate impacts	None	<p><b>Erosion and Sedimentation (Stormwater):</b> The City requires contractors to follow protocols including preparation of a geotechnical study prior to demolition (DMMC Section 16.10.250) as part of an Environmentally Critical Areas analysis. The City would require a geotechnical study prior to any demolition activity at the site. This should alleviate concerns with potential landslides from removal of the retaining wall if that is proposed.</p> <p>The applicant provided a Work Plan document that addresses the erosion control measures and BMPs for the proposed demolition as outlined in <i>Work Plan &amp; Environmental Considerations Related to Structure Demolition</i>, prepared by Ascendent LLC (January 2023). That document is found in the Draft EIS Appendix B, <i>Demolition Plan</i>.</p> <p><b>Eagles:</b> Pre-construction bald eagle nest surveys shall be conducted within 300 feet of the project site to determine the presence of active bald eagle nests. If a nest is present, implementation of the National Bald</p>	None



	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Potential Future Adaptive Reuse
		<p>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.</p> <p><b>Trees:</b> 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, requirements of the City of Des Moines Tree Ordinance shall be implemented and a tree removal permit obtained, to protect and mitigate tree impacts.</p> <p><b>Other Vegetation:</b> 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 other vegetation. Where possible, vegetation within the limits of disturbance shall not be disturbed.</p>	
<b>CONSTRUCTION IMPACTS – WATER QUALITY</b>			
Impacts	None	<p><b>Stormwater:</b> 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.</p>	Less than Alternative 1
Measures to reduce or eliminate impacts	None	<p>The following water quality BMPs shall be applied as part of the project to mitigate the impacts to below a level of significance:</p> <ul style="list-style-type: none"> <li>Stormwater and/or water generated during dust control operations shall be diverted from the work</li> </ul>	None



	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Potential Future Adaptive Reuse
		<p>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 through the soil. Straw wattles will be used over hardscapes and around catch basins. All catch basins on-site shall have inserts placed inside them prior to any demolition taking place.</p> <ul style="list-style-type: none"> <li>Existing vegetation and grass outside the limits of disturbance shall be undisturbed and used as a vegetative barrier along the perimeter of the project site as possible.</li> <li>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.</li> <li>Additional BMPs shall be implemented as necessary during the demolition process.</li> <li>The 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.</li> </ul> <p>In addition, the following standard water quality BMPs for construction will be implemented in accordance with regulatory permit requirements.</p> <ul style="list-style-type: none"> <li>Cleared areas shall be restored and replanted with appropriate native species to stabilize soils following construction activities.</li> <li>Implementation of proper waste handling measures shall apply to prevent spillage of building debris and releases of other construction materials.</li> </ul>	



	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Potential Future Adaptive Reuse
		<ul style="list-style-type: none"> <li>• 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.</li> <li>• Construction will be conducted in accordance with the conditions of all applicable permits issued by regulatory agencies.</li> <li>• 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:                         <ul style="list-style-type: none"> <li>– Waste materials will be transported off-site and disposed of in accordance with applicable regulations and as noted in the SWPPP.</li> <li>– Construction entrances, wheel washes, street cleaning, and other BMPs will be used to prevent tracking of soils beyond the project limits.</li> <li>– Stormwater from work areas will be kept separate from non-work areas.</li> <li>– The locations of existing inlets and catch basins will be identified in the SWPPP and the method of protection described.</li> <li>– Specify locations, protections, and covering practices for stockpiles.</li> <li>– Provide controls to prevent sediment, debris, and other pollutants from entering surface waters and drainage features.</li> </ul> </li> <li>• Develop and implement a Spill Plan to ensure that all pollutants and products are controlled and contained.</li> <li>• BMPs for concrete work include the following:</li> </ul>	



	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Potential Future Adaptive Reuse
		<ul style="list-style-type: none"> <li>No new concrete work is anticipated, but if required for temporary use would be covered and protected from rainfall until cured.</li> <li>Adequate material and procedures to respond to unexpected weather conditions or accidental release of materials will be available on-site.</li> </ul>	
<b>CONSTRUCTION IMPACTS – TRAFFIC</b>			
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 expected to be under 900 truckloads of material from the site.	None
Measures to reduce or eliminate impacts	None	<p>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 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.</p> <p>The applicant would implement haul route requirements in Section 15 of the Street Development Standards of the City of Des Moines Code that address construction including:</p> <ul style="list-style-type: none"> <li>Construction traffic routes for haul operation – physical asset assessment and monitoring (pavement condition).</li> <li>Traffic avoidance impact measures – physical asset assessment, monitoring, and restoration.</li> </ul>	None



	No Action	Alternative 1: Demolition	Alternative 2: Historic Preservation and Potential Future Adaptive Reuse
		<p>Prior to the issuance of any demolition permits or other site altering permits, the 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.</p>	



## 1.11 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.

### 1.11.1 No Action Alternative

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

- Deterioration and eventual loss of individual historic resources in the project area.
- The potential exists for significant adverse impacts on unrecorded archaeological resources.

### 1.11.2 Alternative 1: Demolition Alternative

Significant unavoidable adverse impacts include the following:

- 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. Two 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, *Construction Impacts from Demolition*, of the Draft EIS. 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.
- The potential exists for significant adverse impacts on unrecorded archaeological resources.



### 1.11.3 Alternative 2: Historic Preservation and Potential Future Adaptive Reuse Alternative

Significant unavoidable adverse impacts include the following:

- Potential loss of some or all of the eligible Masonic Home of Washington Historic District over time if individual historic resources within the project area are not able to be protected long-term.
- The potential exists for significant adverse impacts on unrecorded archaeological resources.

## 1.12 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.
- Providing more certainty regarding whether the buildings will remain.

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

- Delay may result in potential increased security risks and calls for City services for fire and law enforcement.
- There would be a delay in meeting the applicant's objective to demolish the on-site structures.
- The site may remain in its existing condition and require maintenance. 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.
- Continued deterioration of the main building, creating additional unsafe conditions and additional vandalization of the site.



## 1.13 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 as well as during the Draft EIS. In response, the City has undertaken a comprehensive, detailed evaluation of historic preservation impacts, which are discussed in Draft EIS Chapter 3, *Cultural Resources: Historic Preservation*, and incorporated by reference in the Final EIS, and Final EIS Appendices M, N, O, and P.

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

## 1.14 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 buildings 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 Potential Future Adaptive Reuse, it is not known who would fund the work or how long the preservation efforts would last.

# CHAPTER 2 ALTERNATIVES



## 2.1 Description of Alternatives

This chapter provides an overview of the proposed Zenith Properties Building Demolition Permit Application project and the alternatives being considered in the Final EIS. The alternatives include the No Action Alternative; Alternative 1, Demolition Alternative; and Alternative 2, Historic Preservation and Potential Future Adaptive Reuse Alternative. The information presented below is largely the same as what is in the Draft EIS, apart from minor clarifications, and is provided as context for the reader in the Final EIS.

Subsequent to the issuance of the Draft EIS and Draft EIS comment period, the City decided to do additional analysis on historic preservation. More details, including a cost estimate, are included in Appendices M, N, O, and P of the Final EIS.

### 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 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.

At the main building, existing building envelope condition issues 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 a vicinity and site map.



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 of the Draft EIS, would be fully or substantially demolished. The exception to this is the potential removal of trees from the eastern woods (Ascendent 2023). That is because trees on the Property will be retained as much as possible during demolition through best management practices (BMPs) and adherence to the City of Des Moines Tree Ordinance. 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). The property IDs referenced above are unique identifiers assigned in the Washington Information System for Architectural and Archaeological Records Data (WISAARD) system to each historic property, allowing for accurate tracking and ease of search within the larger database.

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 Draft EIS Appendix B, *Demolition Plan*). The proposed demolition would primarily be foundation/slab on grade and is not expected to disturb existing soils. There may be minor disturbance during demolition of the basements.

The demolition work within the limits of disturbance (shown in Draft EIS Appendix B, *Demolition Plan*, and Figure 2-1) would remove all buildings, structures, site flatwork, retaining walls, landscaping or other objects, trees, plantings and understory vegetation, and sod (Ascendent 2023). Vegetation within the limits of disturbance will be retained where possible; however, since it is not known if retention of vegetation would be possible, this analysis assumes that retention would not be possible as there is no means to quantify what might be possible.



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## PHASING AND DURATION

The proposed demolition time period would be approximately 5 to 6 months. Expected phases of demolition are as follows:

- **Phase One** – Interior demolition and recycling of interior materials (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 demolition would be conducted consistent with all City regulations, including noise standards, hours of operation, and BMPs for demolition.

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## 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.

In addition to all other buildings to be demolished (none of which exceeds one story), the lower two stories of the main building 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.

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## 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	2,100	252	80
Optimal number of trucks	12	4	1
Trucks trips/hour 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 standards for structural fill and Puget Sound Clear Air Agency (PSCAA) regulations. The applicant would determine the means and methods of hauling concrete and masonry debris 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 shown in Table 2-1, waste and recyclable debris generated are estimated to be fewer than 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*, of the Draft EIS.

### 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); and the front wall and gate (Property ID 731167). The eastern woods (Property ID 731176) would be preserved.

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 is 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 the Draft EIS would guide mothballing (Peterson 2023; OAC Services 2023).

Additional information on historic preservation is provided in Final EIS Appendices M, N, O, and P.

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



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# CHAPTER 3 CULTURAL RESOURCES: HISTORIC PRESERVATION

## 3.1 Updates to the Draft EIS

Draft EIS Chapter 3 describes the affected environment for cultural resources for historic preservation, analyzes the project alternatives for potential historic preservation impacts, and identifies potential mitigation measures for those adverse impacts.

For the full analysis of the alternatives, refer to Draft EIS Chapter 3, which is incorporated by reference in this Final EIS. Potential impacts and mitigation measures are summarized in Final EIS Table 1-1, *Summary of Potential Impacts and Mitigation Measures*. This chapter also includes a description of additional analysis the City conducted on an expanded adaptive reuse scenario in response to comments to the Draft EIS expressing interest in historic preservation options. Detailed information on the expanded adaptive reuse scenario can be found in Final EIS Appendices M, N, O, and P.

As presented in the Draft EIS analysis, significant unavoidable adverse impacts were identified related to historic preservation including the following:

- **No Action Alternative:** Significant unavoidable adverse impacts on historic built environment resources because of permanent changes to historic resources include:
  - Deterioration and eventual loss of individually eligible historic resources identified in Draft EIS Table 3-3, *Historic Resources Surveyed for this Analysis*, within the project area.
  - Loss of eligibility for the Masonic Home of Washington Historic District identified in Draft EIS Table 3-2, *Historic District*, due to the eventual loss of eligible contributing historic resources within the project area.



- **Alternative 1: Demolition Alternative:** Significant unavoidable adverse impacts on historic built environment resources because of permanent changes to historic resources include:
  - Full removal of individually eligible historic resources identified in Draft EIS Table 3-3 through demolition.
  - Removal of the eligible Masonic Home of Washington Historic District identified in Draft EIS Table 3-2 through demolition of eligible contributing historic resources.

Draft EIS Section 3.2.2, *Historic Resources*, affirms the importance of the Property through National Register eligibility at the statewide level of significance. The magnitude of the loss of the Property through demolition (Alternative 1) is affirmed in Draft EIS Section 3.4.2, *Significant Unavoidable Adverse Impacts*. The Revised Code of Washington (RCW) and the Washington Administrative Code (WAC) do not provide a formula for quantifying the social costs of the proposed action or to calculate mitigation for the costs of that action. For federal projects over \$50,000, the 1960 Archaeological and Historic Preservation Act (Moss-Bennet Act, 16 USC 469c(a)) [recently omitted] allows for around 1 percent of the total amount of project costs to be allocated for mitigation costs for cultural resources. The Draft EIS established the cost of mitigation at 8 percent of the total 2023 King County appraised value for the combined land and Property, recognizing the impact of the loss to the City and the state, the absence of development plans with associated project costs, and the assumption that demolition project costs would be less than the 2023 King County appraised value for the combined land and Property.

The mitigation in the Final EIS is being increased and changed recognizing the local role of the Property and the impact of its removal to the City.

The following language is provided to replace the mitigation measures identified in Draft EIS Section 3.4.1, *Mitigation Measures Specific to Each Action Alternative, Alternative 1: Demolition Alternative, Historic Built Environment Resources*.

The following revised mitigation measures are proposed as part of this Final EIS. The intent is for these mitigation measures to be completed based on the historic resources being eligible under National Register Criteria for Evaluations A and C and the scale of the historic resources consisting of an eligible historic district with 10 eligible contributing resources, two 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 information assembled for the 2023



Masonic Home of Washington Historic Report (Peterson 2023) per HABS standards and include copies of original drawings and high-resolution digital photographs.

- Allow salvage companies, such as Second Use and similar, on-site prior to demolition for architectural salvage work for resale purposes to support waste stream diversion of building materials, including stained glass, leaded light windows, light fixtures, marble and wood finishes, and decorative metal work. Recommend that salvage companies work directly with historical societies and agencies to identify and select features that may be of interest to them.
- One-time payment of \$1,161,560 to a dedicated preservation fund established and managed by the City of Des Moines. This fund would 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 intent is also to address the local impacts due to the removal of the eligible Masonic Home of Washington Historic District and two individually eligible National Register historic resources.
- If the Property is redeveloped, the applicant shall provide an on-site location for an appropriately scaled (approximately 5,000- to 10,000-square-foot) historical interpretation installation to share the site's history that is continually maintained and publicly accessible adjacent to Marine View Drive, or another location that is mutually agreeable to the applicant and City. The installation may include landscaping, signage, seating, photographs, re-installation of salvaged features, and other design elements at the applicant's costs, as mutually agreed upon by the applicant and City. The City will review and approve the installation administratively, provided however the City shall hold a public meeting to receive public comment regarding the installation. Notice of this condition shall be recorded on title.
- **Alternative 2: Historic Preservation and Potential Future Adaptive Reuse:** There are no significant unavoidable adverse impacts under this alternative.



## ADDITIONAL ANALYSIS ON HISTORIC PRESERVATION

Below is a description of the additional analysis on an expanded adaptive reuse scenario the City conducted in response to comments to the Draft EIS that expressed an interest in historic preservation.

### *Appendix M, Additional Information on Historic Preservation*

Additional information on historic preservation prepared by Northwest Vernacular is provided in Final EIS Appendix M, *Additional Information on Historic Preservation*. This expanded adaptive reuse scenario addresses the rehabilitation of and additions to the Masonic Home (main building) for multiple-family housing, including the use of the Federal Historic Tax Credit and the State Special Tax Valuation programs and the building of infill multiple-family development in the eastern woods in a manner that retains historic district eligibility to allow use of the Federal Historic Tax Credits. This information was used by Leland Consulting Group in their feasibility study analysis in Appendix N, *Additional Information on Historic Preservation – Landmark Site Feasibility Analysis*, and by DCW Cost Estimating to provide cost data in Appendix O, *Additional Information on Historic Preservation – Concept Cost Plan*, and by ECONorthwest to provide analysis of potential development on the eastern property in Appendix P.

### *Appendix N, Additional Information on Historic Preservation - Landmark Site Feasibility Analysis*

Additional information on historic preservation is provided in Final EIS Appendix N. The City hired Leland Consulting Group to specifically analyze whether development of infill rental housing in the eastern woods is economically feasible and could generate excess revenues that could contribute to the preservation of the main building. The memorandum summarizes the key findings from this analysis, provides a review of background documentation regarding Property preservation and development on site, describes the market conditions that contribute to key assumptions in the financial analysis, and suggests potential funding tools that could help address potential gaps.

Key Findings included the following:

- Under current market conditions, apartments on this site are not feasible. The rent needed to achieve feasibility is \$3.75 per square foot per month—well above typical market rents. Because



apartments are infeasible on this site, revenue from development of apartments would not be able to support the renovation of the primary building.

- The cost assumptions provided by DCW suggest that this project would be significantly more expensive than typical wood-frame apartment construction. These costs are 2.3 times higher than the average construction costs of similar recently built projects, largely due to the requirements for finishes and architectural features that reflect the look of the primary building. These requirements are tied to the historic tax credits needed to fund the preservation of the main building and maintaining National Register eligibility of the historic district concurrent with infill development. Without that preservation goal, apartment construction would be closer to market costs. As a result of these higher costs, the feasibility gap based on these costs (de-escalated to 2025) is more than \$160 million. To achieve feasibility, rent would have to be at least \$8.30 per square foot—32 percent higher than the market asking rent per square foot of apartments on the Upper West Side of Manhattan, one of the country’s most expensive rental markets.
- Feasibility would require significant changes to construction costs or cap rates along with a large increase in rents. The most recent multi-family developments in Des Moines have been affordable housing, which benefit from subsidies and incentives that overcome the market’s gap between rents and rapidly increasing construction costs.

### **Appendix O, Additional Information on Historic Preservation - Concept Cost Plan**

The City hired the firm DCW Cost Estimating to provide cost data associated with the development of infill rental housing in the eastern woods and rehabilitation of the main building for housing per the development approach provided in Appendix M. This information was used by Leland Consulting Group in their feasibility study analysis and is included as Final EIS Appendix O.

### **Appendix P, Additional Information on Historic Preservation - Analysis of Potential Development on Eastern Property**

An additional study was prepared by EConorthwest, at the request Zenith Properties LLC, analyzing the potential development on the eastern portion of the property and whether such development could “cross-subsidize” the adaptive reuse of the Property. A copy is provided in the Final EIS as Appendix P. This memorandum summarizes the key findings from the analysis and concluded that such a development is not feasible. This information was reviewed by Leland Consulting Group in their feasibility analysis in Final EIS Appendix N.



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# CHAPTER 4 CULTURAL RESOURCES: ARCHAEOLOGICAL

## 4.1 Updates to the Draft EIS

Draft EIS Chapter 4 describes the affected environment for Cultural Resources: Archeological. It analyzes the project alternatives for potential archaeological impacts and identifies potential mitigation measures for those adverse impacts.

The affected environment section of Draft EIS Chapter 4 established that no archaeological resources are recorded within the project area, but there is potential for unrecorded archaeological resources within the project area. As presented in the Draft EIS, potential significant unavoidable adverse impacts include the following:

- **No Action Alternative; Alternative 1, Demolition; and Alternative 2, Historic Preservation and Potential Future Adaptive Reuse:** The potential exists for significant adverse impacts on unrecorded archaeological resources.

No changes or clarifications to the archaeological analysis were made based on the comments received during the Draft EIS comment period. Draft EIS comments about archaeological resources are responded to in Final EIS Appendix L, *Response to Comments on the Draft EIS*.

For the full analysis, see Draft EIS Chapter 4, which is incorporated by reference in this Final EIS. Potential impacts and mitigation measures are summarized in Final EIS Table 1-1, *Summary of Potential Impacts and Mitigation Measures*.



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# CHAPTER 5 CONSTRUCTION IMPACTS FROM DEMOLITION

## 5.1 Updates to the Draft EIS

The Draft EIS describes the affected environment 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; analyzes the project alternatives for potential impacts on those elements; and identifies potential mitigation measures for those adverse impacts.

As presented in the Draft EIS analysis, significant unavoidable adverse impacts were identified related to construction impacts from demolition, including the following:

- **Alternative 1, Demolition Alternative:** significant unavoidable adverse impacts were identified related to noise and vibration.

No significant unavoidable adverse impacts were identified related to air quality, GHG emissions, water quality/stormwater, plants and animals, traffic, or earth and environmental health resources.

No changes to the analysis in the Construction Impacts from Demolition chapter were made based on the comments received during the Draft EIS comment period. Draft EIS comments about construction impacts are responded to in Final EIS Appendix L, *Response to Comments on the Draft EIS*. Final EIS Chapter 8, *Corrections and Clarifications*, includes information on any clarifications to construction impacts from demolition.

For the full analysis of construction impacts from demolition, see Draft EIS Chapter 5, which is incorporated by reference in this Final EIS. Potential impacts and mitigation measures are summarized in Final EIS Table 1-1, *Summary of Potential Impacts and Mitigation Measures*.



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Full references for source material cited in the Draft EIS and/or the Final EIS are presented below, by chapter.

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## CHAPTER 3, CULTURAL RESOURCES: HISTORIC PRESERVATION

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# CHAPTER 7 DISTRIBUTION LIST

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## TRIBES

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

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## 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

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## 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

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## REGIONAL

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

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## OTHER MUNICIPALITIES

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

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## 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

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## OTHER INTERESTED PARTIES

- Mailed to property owners within a 300-foot radius of the project site
- Individuals who submitted comments during the scoping period and Draft EIS comment period
- Organizations who submitted comments during the scoping period and Draft EIS comment 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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# 8

## CHAPTER 8 CORRECTIONS AND CLARIFICATIONS

Following issuance of the Draft EIS and review of the comments received, the City is providing corrections and clarifications to the analysis as presented in the Draft EIS, as described below. Some of the revisions are provided with a narrative explanation, and some are provided through underline/~~striketrough~~ text to show the revisions (i.e., additions and deletions) needed to text presented in the Draft EIS. The chapter location of each correction or clarification is identified below so the reader will be able to locate the original narrative from the Draft EIS. Some of the earlier chapters in this Final EIS include additional information that is not a correction or clarification and is not included in this chapter.

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### CHAPTER 1, INTRODUCTION AND SUMMARY

In Section 1.4, *Project Background and Historic Use of the Property*, the following text was added to the second paragraph in the Final EIS:

In 2019, the Freemasons of Washington submitted a demolition permit application as part of the sale of the Property. In September 2020, Zenith applied to the City for a demolition permit to remove all structures of the former Masonic Home on their Property. The application is filed under permit number LUA2019-0032 and includes demolition of structures that are eligible for listing in the state and national registers (Zenith 2022). The structures on the Property were removed from the City of Des Moines Historical Properties historic property survey on November 30, 2022, pursuant to the applicant's request.



Section 1.8, *Additional Analysis in the Final EIS*, was added to the Final EIS to describe the additional analysis the City conducted on historic preservation options for the Property based on interest expressed in comments received on the Draft EIS.

In Final EIS Section 1.9.2, *Alternative 1: Demolition Alternative*, the following text was added:

... Work would result in substantial demolition of the central oval, west, and north lawns. Additional work would include removing existing building foundations and utilities, including water, sewer, and gas. See Chapter 2, *Alternatives*, of the Draft and Final EIS for additional information.

In Final EIS Section 1.9.3, *Alternative 2: Historic Preservation and Potential Future Adaptive Reuse Alternative*, the following text was amended:

Alternative 2 assumes that Zenith preserves and structurally stabilizes all of the existing ~~structures~~ historic resources on-site in a condition that may allow for potential future adaptive reuse.

The following are amendments to Table 1-1:

- The following text was amended in the *No Action Alternative* column, *Cultural Resources – Historic Preservation* section, *Impacts* row:

If no other future proposal for the Property moved forward, the No Action Alternative ~~is expected to~~ would result in the deterioration and eventual loss of the historic resources within the project area due to neglect, the impact of natural forces, including exposure to the elements, and the impact of human-driven forces. These all increase the severity of one another. ~~This includes exposure to the elements with~~ Maintenance would only occur to the extent necessary to comply with the International Property Maintenance Code (IPMC) Section 301.3, natural or human-caused fire, and vandalism.
- The following text was amended in the *Alternative 1: Demolition* column, *Cultural Resources – Historic Preservation* section, *Impacts* row:

... The demolition work would result in the loss of two resources individually eligible for listing or designation in a historic register – the individually eligible main building and water tower, and loss of the eligible historic district through demolition of contributing resources. **Impacts would be significant.**
- New mitigation text was added in the *Alternative 1: Demolition* column, *Cultural Resources – Historic Preservation* section, *Measures to reduce or eliminate impacts* row, to replace the



mitigation measures identified in Draft EIS Section 3.4.1. See below under corrections and clarifications for Chapter 3, *Cultural Resources: Historic Preservation*, to read the new mitigation measures.

- In the *Alternative 1: Demolition* column, *Construction Impacts – Noise and Vibration* section, the table was reorganized to combine the two *Impacts* rows and the two *Measure to reduce or eliminate impacts* rows. “Noise” and “Vibration” paragraph headings were added to the two *Impacts* paragraphs. No other changes were made to the moved text.
- New mitigation text was added in the *Alternative 1: Demolition* column, *Construction Impacts – Earth and Environmental Health* section, *Measures to reduce or eliminate impacts* row:

**Erosion and Sedimentation (Stormwater):** The City requires contractors to follow protocols including preparation of a geotechnical study prior to demolition (DMMC Section 16.10.250) as part of an Environmentally Critical Areas analysis. The City would require a geotechnical study prior to any demolition activity at the site. This should alleviate concerns with potential landslides from removal of the retaining wall if that is proposed.

The applicant provided a Work Plan document that addresses the erosion control measures and BMPs for the proposed demolition as outlined in *Work Plan & Environmental Considerations Related to Structure Demolition*, prepared by Ascendent LLC (January 2023). That document is found in the Draft EIS Appendix B, *Demolition Plan*.

In Final EIS Section 1.11.2 (Draft EIS Section 1.8.2), *Alternative 1: Demolition*, the following text was revised in the second bullet:

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~~Two of the eligible contributing resources are also individually National Register eligible.

In Final EIS Section 1.11.2 (Draft EIS Section 1.8.2), the following is added under each alternative. This conclusion was included in Draft EIS Section 4.7, *Significant Unavoidable Adverse Impacts*, but was erroneously left out of Draft EIS Chapter 1, *Introduction and Summary*:

- The potential exists for significant adverse impacts on unrecorded archaeological resources.



In Final EIS Section 1.12 (Draft EIS Section 1.9), *Benefits and Disadvantages of Delaying the Proposal*, the following bullets were revised:

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:

- Delay may result in potential increased security risks and calls for City services for fire and law enforcement.
- 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.
- Continued deterioration of the main building, creating additional unsafe conditions and additional vandalism of the site.

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## CHAPTER 2, ALTERNATIVES

In Draft EIS Section 2.1.2, *Alternative 1: Demolition Alternative*, first paragraph, the following language was added:

Under Alternative 1, most of the historic resources identified in Table 3-3, *Historic Resources Surveyed for this Analysis*, p. 3-8 of the Draft EIS, would be fully or substantially demolished. The



exception to this is the potential removal of trees from the eastern woods (Ascendent 2023). That is because trees on the property will be retained as much as possible during demolition through best management practices (BMPs) and adherence to the City of Des Moines Tree Ordinance. 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). The property IDs referenced above are unique identifiers assigned in the Washington Information System for Architectural and Archaeological Records Data (WISAARD) to each historic property allowing for accurate tracking and ease of search within the larger database.

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## CHAPTER 3, CULTURAL RESOURCES: HISTORIC PRESERVATION

In Final EIS Section 3.1, the following language was added to the identified significantly unavoidable adverse impacts:

- **No Action Alternative:** Significant unavoidable adverse impacts on historic built environment resources because of permanent changes to historic resources include:
  - Deterioration and eventual loss of individually eligible historic resources identified in Draft EIS Table 3-3, *Historic Resources Surveyed for this Analysis*, within the project area.
  - Loss of the eligible Masonic Home of Washington Historic District identified in Draft EIS Table 3-2, *Historic District*, due to the eventual loss of eligible contributing historic resources within the project area.
- **Alternative 1: Demolition Alternative:** Significant unavoidable adverse impacts on historic built environment resources because of permanent changes to historic resources include:
  - Full, ~~substantial, and partial~~ loss of individually eligible historic resources identified in Draft EIS Table 3-3 through demolition.
  - Loss of the eligible Masonic Home of Washington Historic District identified in Draft EIS Table 3-2 through demolition of eligible contributing historic resources.

Draft EIS Section 3.2.2, *Historic Resources*, affirms the importance of the Property through National Register eligibility at the statewide



level of significance. The magnitude of the loss of the Property through demolition (Alternative 1) is affirmed in Draft EIS Section 3.4.2, *Significant Unavoidable Adverse Impacts*. The Revised Code of Washington (RCW) and the Washington Administrative Code (WAC) do not provide a formula for quantifying the social costs of the proposed action or to calculate mitigation for the costs of that action. For federal projects over \$50,000, the 1960 Archaeological and Historic Preservation Act (Moss-Bennet Act, 16 USC 469c(a)) [recently omitted] allows for around 1 percent of the total amount of project costs to be allocated for mitigation costs for cultural resources. The Draft EIS established the cost of mitigation at 8 percent of the total 2023 King County appraised value for the combined land and Property recognizing the impact of the loss to the City and the state, the absence of development plans with associated project costs, and the assumption that demolition project costs would be less than the 2023 King County appraised value for the combined land and Property.

The mitigation in the Final EIS is being increased and changed recognizing the local role of the Property and the impact of its loss to the City.

The following language is provided to replace the mitigation measures identified in Draft EIS Section 3.4.1, *Mitigation Measures Specific to Each Action Alternative, Alternative 1: Demolition Alternative, Historic Built Environment Resources.*

The following revised mitigation measures are proposed as part of this Final EIS. The intent is for these mitigation measures to be completed based on the historic resources being eligible 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, two 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 information assembled for the 2023 Masonic Home of Washington Historic Report (Peterson 2023) per HABS standards and include copies of original drawings and high-resolution digital photographs.
- Allow salvage companies, such as Second Use and similar, on-site prior to demolition for architectural salvage work for resale purposes to support waste stream diversion of building materials, including stained glass, leaded light windows, light fixtures, marble and wood finishes, and decorative metal work. Recommend that salvage companies work directly with historical societies and agencies to identify and select features that may be of interest to them.



- One-time payment of \$1,161,560 to a dedicated preservation fund established and managed by the City of Des Moines. This fund would 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 intent is also to address the local impacts due to the loss of the eligible Masonic Home of Washington Historic District and two individually eligible National Register historic resources.
- If the Property is redeveloped, the applicant shall provide an on-site location for an appropriately scaled (approximately 5,000–10,000 square foot) historical interpretation installation to share the site’s history that is continually maintained and publicly accessible adjacent to Marine View Drive, or another location that is mutually agreeable to the applicant and City. The installation may include landscaping, signage, seating, photographs, re-installation of salvaged features, and other design elements at the applicant’s costs, as mutually agreed upon by the applicant and City. The City will review and approve the installation administratively, provided however the City shall hold a public meeting to receive public comment regarding the installation. Notice of this condition shall be recorded on title.
- **Alternative 2: Historic Preservation and Potential Future Adaptive Reuse:** There are no significant unavoidable adverse impacts under this alternative.

On Draft EIS Section 3.2.2, *Historic Resources*, page 3-13, the following text should be added to the *Masonic Home of Washington – Central Oval, West, and North Lawns*:

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; foundation plantings at the Main Building, including the six mature Cedar of Lebanon trees at the ends of the north and south wings; and structures and site furnishings including edging, retaining wall, light standards, and seating.

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## CHAPTER 4, CULTURAL RESOURCES: ARCHAEOLOGICAL

In Draft EIS Section 4.2, page 4-2, Table 4.1, row 2, *Governor’s Executive Order 21-02*, it should be clarified that state funding has been identified for the proposal. Governor’s Executive Order 21-02 would only be required if the situation changes and the applicant uses state funds.



In Draft EIS Section 4.3, page 4-3, the citation to “Robinson-Mathes and Ferris 2023” is a misspelling and should be corrected to “Robison-Mathes and Ferris 2023.” This is a correction for any mention of the citation throughout the Draft EIS.

In Draft EIS Section 4.3, page 4-3, clarification is needed for the description of the HDR survey to more fully align with the statement in Draft EIS Chapter 1, Section 1.5.2, page 1-9; refer to the following statement from page 1-9: “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.”

On Draft EIS Section 4.5, page 4-15, first sentence, it should be clarified that under the RCW, all precontact archaeological sites are protected, not just those eligible for or listed in the NRHP or Washington Heritage Register. This is stated later in the same paragraph with the following statement: “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.”

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## **APPENDIX M, ADDITIONAL INFORMATION ON HISTORIC PRESERVATION**

Additional information on historic preservation through a conceptual study of an expanded adaptive reuse scenario is provided in Final EIS Appendix M to address the rehabilitation of and additions to the Masonic Home for multiple-family housing, including the use of the Federal Historic Tax Credit and the State Special Tax Valuation programs and building of infill multiple-family development in the eastern woods in a manner that retains historic district eligibility.



## APPENDIX N, *ADDITIONAL INFORMATION ON HISTORIC PRESERVATION - LANDMARK SITE FEASIBILITY ANALYSIS*

Additional information on historic preservation is provided in Final EIS Appendix N. The City hired Leland Consulting Group to analyze the expanded adaptive reuse scenario in Appendix M, specifically whether development of rental housing on the eastern portion of the site is economically feasible and could generate additional revenue that could contribute to the preservation of the main building. The memorandum summarizes the key findings from this analysis, provides a review of background documentation regarding property preservation and development on site, describes the market conditions that contribute to key assumptions in the financial analysis, and suggests potential funding tools that could help address potential gaps.

Key Findings of the analysis include the following:

- Under current market conditions, apartments on this site are not feasible. The rent needed to achieve feasibility is \$3.75 per square foot per month—well above typical market rents. Because apartments are infeasible on this site, revenue from development of apartments would not be able to support the renovation of the main building.
- The cost assumptions provided by DCW suggest that this project would be significantly more expensive than typical wood-frame apartment construction. These costs are 2.3 times higher than the average construction costs of similar recently built projects, largely due to the requirements for finishes and architectural features that reflect the look of the main building. These requirements are tied to the historic tax credits needed to fund the preservation of the main building and maintain National Register eligibility of the historic district concurrent with infill development. Without that preservation goal, apartment construction would be closer to market costs. As a result of these higher costs, the feasibility gap based on these costs (de-escalated to 2025) is more than \$160 million. To achieve feasibility, rent would have to be at least \$8.30 per square foot—32 percent higher than the market asking rent per square foot of apartments on the Upper West Side of Manhattan, one of the country’s most expensive rental markets.
- Feasibility would require significant changes to construction costs or cap rates along with a large increase in rents. The most recent multi-family developments in Des Moines have been affordable housing, which benefit from subsidies and incentives that overcome the market’s gap between rents and rapidly increasing construction costs.



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## ***APPENDIX O, ADDITIONAL INFORMATION ON HISTORIC PRESERVATION - CONCEPT COST PLAN***

The City hired the firm DCW Cost Estimating to analyze costs associated with the expanded adaptive reuse scenario in Final EIS Appendix M, specifically whether development of rental housing on the eastern portion of the site is economically feasible and could generate additional revenue that could contribute to the preservation of the main building. This information was based off of the description provided by NW Vernacular, and the cost estimated data prepared were used by Leland Consulting Group in their Feasibility Analysis.

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## ***APPENDIX P, ADDITIONAL INFORMATION ON HISTORIC PRESERVATION - ANALYSIS OF POTENTIAL DEVELOPMENT ON EASTERN PROPERTY***

An additional study was prepared by EConorthwest analyzing the potential development on the eastern portion of the property and whether such development could “cross-subsidize” the adaptive reuse of the Property. A copy is provided in the Final EIS as Appendix P. This memorandum summarizes the key findings from the analysis and concluded that such a development is not feasible. This information was reviewed by Leland Consulting Group in their feasibility analysis in Final EIS Appendix N.