

Technical Memorandum

Date: Monday, September 01, 2025

Project: Proposed Allentown Truck Reroute Project

To: Mark Hafs, Project Director
City of Tukwila
6200 Southcenter Boulevard
Tukwila, WA 98188

From: Sarah Desimone, MA and Jennifer Ferris, MA, RPA (HDR Cultural Resources Specialists)

Subject: Historic Built-Environment Resources Desktop Review for the Allentown Truck Reroute Project Supplemental Environmental Impact Statement

This technical memorandum describes the results of the historic built-environment resources desktop review completed to support the Supplemental Environmental Impact Statement (SEIS) for the Proposed Allentown Truck Reroute Project (Proposed Project) located in Tukwila, Renton, and unincorporated King County, Washington. The Proposed Project is located in Sections 3, 4, 9, 10, 11, 13, 14, 15, 23, 24, and 26 of Township 23, Range 04 E, and Section 18 and 19 of Range 05 E of the Willamette Meridian. The No-Action Alternative (NAA), as described in the Allentown Truck Reroute Project State Environmental Policy Act Final Environmental Impact Statement (FEIS) (City 2025), and one proposed route alternative (Alternative 6), will be analyzed in the SEIS to determine their potential impacts on the built and natural environments. A map of Alternative 6 is shown in Figure 1 **Error! Reference source not found.**

This desktop review focused on archival records pertaining to previously recorded historic built-environment resources on parcels within and immediately adjacent to Alternative 6. This includes those that may be listed in or eligible for listing in the National Register of Historic Places (NRHP), the Washington Heritage Register (WHR), and/or the King County Landmarks Register (KCLR).

Project Background

The BNSF Railway's (BNSF's) South Seattle Intermodal Facility (BNSF facility) in the Allentown neighborhood of Tukwila, Washington, is an important economic link to the Puget Sound region. It serves as an inland port, providing domestic intermodal transloading between truck and rail. Currently incoming freight trucks access the BNSF facility from the S 129th Street bridge to S 50th Place. Outgoing trucks can use either the S 129th Street bridge or take S 124th Street to the 42nd Avenue S bridge. After the planned replacement of the 42nd Avenue S bridge, truck traffic will also be able to access the BNSF facility by traveling north on the 42nd Avenue S bridge and reaching the facility via S 124th Street. To improve livability and safety in Allentown while supporting the operations of the facility, the City of Tukwila (City) evaluated potential alternative truck access routes to the BNSF facility through the FEIS (City 2025).

After the scoping period for the Draft Environmental Impact Statement (DEIS), and during the time the FEIS was being prepared, an additional alternative (Alternative 6) to the current BNSF

truck route was identified. Thus, the City undertook an SEIS that analyzes two alternatives: Alternative 6 (the Rainier Avenue S alternative [see Figure 1] and the NAA as described in the FEIS (City 2025).

The City is the lead agency for reviewing the Proposed Project under the State Environmental Policy Act (SEPA) and is overseeing the preparation of the Draft Supplemental Environmental Impact Statement (DSEIS) for the Proposed Project. One proposed truck route alternative (Alternative 6) and the long-term route that has been used for several decades (the NAA) will be analyzed in the SEIS to determine their potential impacts on the built and natural environments. Alternative 6, which was identified through additional public comment, is intended to reduce the impacts of truck traffic in residential and recreational areas.

No-Action Alternative Description

Under the NAA, the development of an alternative route for freight trucks accessing the BNSF facility would not be considered. The truck route would not be modified or improved.

Alternative 6 Description

Alternative 6 would use 50th Place S and S 129th Street; both inbound and outbound truck traffic would follow this route. Trucks would not travel west on S 124th Street, nor would they use the 42nd Avenue S bridge to cross the Duwamish River.

Northbound trucks departing from the BNSF facility would use a short portion of S 124th Street to access 50th Place S, continue east on S 129th Street, and then travel north on State Route (SR) 900. Stretches of SR 900 are also referred to as Martin Luther King (MLK) Jr. Way S locally. Trucks needing to use SR 99 northbound would exit northbound SR 900 at S Boeing Access Road, travel west to Tukwila International Boulevard, cross over the Duwamish River using the Tukwila International Boulevard bridge, and continue west to the SR 99 northbound on-ramp. Trucks arriving from the north would follow the same route in reverse order.

Southbound trucks departing from the BNSF facility would also use a short portion of S 124th Street to access 50th Place S, continue to S 129th Street, and then travel south on SR 900. In the city of Renton, SR 900 is mapped as MLK Jr. Way S, switching to “SW Sunset Boulevard” where it aligns in an east–west direction. Truck traffic from the BNSF facility would follow SW Sunset Boulevard eastward to where it intersects with SR 167/Rainier Avenue S, and travel along Rainier Avenue S to the interchange with Interstate (I-) 405. From I-405, the truck traffic originating from the BNSF facility would then reach the I-5 interchange where the trucks would exit to go south. Trucks arriving from the south would follow the same route but in reverse order.

The key feature of Alternative 6 is that truck traffic from the BNSF facility would not travel through the Allentown neighborhood along Interurban Avenue S or SR 599 between the I-5/I-405 interchange to the south and the Tukwila International Boulevard/SR 99 interchange to the north. Please refer to Figure 1.

Cultural-Resources Regulations

The Proposed Project is being reviewed under SEPA and must comply with the Revised Code of Washington (RCW). Additionally, the Proposed Project must comply with the King County Code (KCC) as the Proposed Project area resides in King County.

King County Code 20.62

KCC Chapter 20.62 outlines procedures and regulations for the identification and protection of historic and archaeological resources significant to the history of King County. Historic or archaeological resources that are of significance to King County are defined under KCC 20.62.040, and the procedures for nomination of locally significant resources to the KCLR are defined under KCC 20.62.050. In accordance with KCC 20.62.150, any resources identified in the King County Historic Resources Inventory (KCHRI) shall not be altered, demolished, or relocated as a consequence of any development proposal without prior review from the appointed King County Landmarks Commission.

State Regulations

The SEPA review process, as outlined in RCW 43.21c, seeks to provide information that will inform agency decision makers, applicants, and the public to understand how a project would affect the environment. Under SEPA, cultural resources on the subject or adjacent parcels, including historic built-environment resources, should be evaluated for their eligibility to local, state, and/or national registers. SEPA applicants assess potential project impacts to such resources and document their findings in the SEPA checklist.

The lead state agency will review the applicant-prepared SEPA checklist and other information about the proposal and will either make a determination of nonsignificance (DNS) or determine that an Environmental Impact Statement (EIS) is necessary to further evaluate potential Proposed Project impacts. For the current Proposed Project, the City is the lead agency and is preparing the EIS; the EIS provides information to all agencies that must approve the proposal.

The Revised Code of Washington, which governs cultural resources in the state, is organized into several key chapters, including RCW 27.44 (Indian Graves and Records Act), RCW 27.53 (Archaeological Sites and Resources Act), and RCW 68.60 (Abandoned and Historic Cemeteries and Historic Graves).

Historic Context

Historic built-environment resources identified within and adjacent to Alternative 6 are located in Renton, Tukwila (Allentown and nearby), and the Bryn Mawr-Skyway neighborhood in unincorporated King County. See the FEIS (City 2025) for a historical context of the Allentown region.

Renton

Renton is located at the south end of Lake Washington, bordered on the northwest by Bryn Mawr-Skyway (an unincorporated community in King County) and on the southwest by Tukwila. The Cedar River runs south from Lake Washington through downtown Renton and the Duwamish River runs north–south just outside its western boundary. The first non-Native settlers arrived in the area in the early 1850s. Henry Tobin established a sawmill in 1853, and Dr. R. H. Bigelow opened the Duwamish Coal Company next door the same year. In 1855, tensions between the non-Native settlers and the Natives resulted in a brief war during which Tobin’s mill was burned (Stein and Boba 2024). When fighting ceased, Natives were forcibly removed from the area and many were assigned to reservations under the Treaty of Point Elliott (Richards 2005). Both businesses were closed by 1856, but Bigelow’s operation is significant as the first coal mine in King County (Stein and Boba 2024).

In 1873, Tobin’s widow Diana, who held the patent on Tobin’s land, married a landowning settler, Erasmus Smithers. Together, they owned nearly 500 acres of land. Smithers and other settlers rediscovered coal in the area circa 1875 and needed funds to set up a new mining operation. They called on Captain William Renton, a wealthy lumber and shipping merchant, who provided capital in exchange for the naming of both the mining operation and the town after him. Smithers filed the first 28-block plat of the Town of Renton on September 5, 1875. Because of its proximity to Lake Washington and the Cedar, Green, and Duwamish Rivers, Renton became the local coal industry hub in the late nineteenth and early twentieth centuries, attracting white and black settlers, Chinese immigrants, and Native Americans to work in the mines.

Along with its lake and river connections, Renton benefited from its proximity to multiple rail lines. In 1877 the Seattle & Walla Walla Railroad (property identifier [ID] 708606) was the first steam railroad to arrive, connecting Seattle to Renton through Tukwila’s Black River Junction (Stein and Boba 2024). Beginning in 1896, the electric Seattle, Renton & Southern Railway ran from Seattle to Renton on the western shore of Lake Washington, following the current Rainier Avenue S through Bryn Mawr (Crowley 1999). In 1907, the Northern Pacific Railway (NP) completed the Lake Washington Beltline (LWB) (property ID 88798), which followed the eastern shore of Lake Washington connecting the NP main line in Renton to the Seattle, Lake Shore and Eastern Railway in Woodinville (Allen and O’Brien 2007). In 1909, the Milwaukee Road completed its subsidiary—the Chicago, Milwaukee & Puget Sound Railway (CM&PS; property ID 734040)—through Renton. The CM&PS began in Tacoma, stopped in Seattle, then passed through Renton before continuing east to Chicago and Milwaukee (Luttrell 2003).

Renton’s rail connections spurred the town’s early growth. The Seattle Car Manufacturing Co. (now PACCAR) opened a factory in 1908 and by 1910, Renton was known as the commercial center of the area with its many lumber mills and factories producing bricks, briquettes, tile, cigars, glass, twine, and pasta. In contrast, land in the nearby Duwamish and White River valleys, including Allentown, was used primarily for agricultural production (Stein and Boba 2024).

One of the biggest influences in Renton’s development was the introduction of the Boeing Airplane Company (Boeing). In 1941, the U.S. Navy opened a facility on the south shore of Lake

Washington in Renton to manufacture bombers for use in World War II (1941–1944). In 1943, the U.S. Air Force acquired the factory and built the adjacent Renton airfield to build Boeing B-29 Superfortress bombers. In 1949, Boeing began developing jet transportation at its Renton plant, including the 367-80 (aka Dash 80) and the first commercial jet, the 707. Boeing Renton has been the site of 737 jet assembly since 1967 (Boeing 2025; Stein and Boba 2024).

Bryn Mawr-Skyway

Sandwiched between Tukwila and Renton, Bryn Mawr was first platted in 1890 by Lillie R. Parker and her husband, William. Welsh for “windy hill,” the Parkers named it after a place of the same name in their hometown of Pennsylvania (Meany 1923:29). Located four blocks west of the Interurban line, parcels in Bryn Mawr were initially advertised as an ideal location for summer homes or fruit and vegetable farms, and the area was used primarily for camping and picnicking through 1902, when it was sold to a development company (*Seattle Times* 1903a). In 1903, Bryn Mawr was replatted with streets and parks, and by 1906, it had a hotel with a Lake Washington view (*Seattle Times* 1907). It developed incrementally but remained sparsely developed with large agricultural parcels through the 1930s (NETR 2025; *Seattle Times* 1903b). Skyway Park (later Skyway) developed after World War II as affordable housing for returning veterans. The first blocks of homes were built in Skyway in 1943, and in September 1944, 500 Federal Housing Authority–approved homes were put on the market (*Seattle Times* 1944; Wilson 1992). The remaining parcels in Bryn Mawr were developed during the Skyway boom. Primarily a residential neighborhood with a few supporting businesses, the Bryn Mawr-Skyway neighborhood was fully developed by 1968 (NETR 2025).

Historic Built-Environment Desktop Review

HDR Engineering, Inc. (HDR) cultural-resources specialist staff completed a desktop review in August 2025 using two databases: (1) Washington Information System for Architectural and Archaeological Records Data (WISAARD), managed by the Washington State Department of Archaeology and Historic Preservation (DAHP) (DAHP 2025), and (2) KCHRI managed by the King County Historic Preservation Program (KCHPP). The research area consisted of the Alternative 6 boundary, which comprises the road right-of-way (ROW).

No previously recorded historic built-environment resources are located within or adjacent to Alternative 6 that are listed in the NRHP, WHR, or KCLR.

There are 74 previously recorded historic built-environment resources within or adjacent to Alternative 6. Of these, two were previously determined eligible for listing in the NRHP by the Washington State Historic Preservation Office (SHPO) (property IDs 88798 and 708606) (Table 1, Figure 2). These two NRHP-eligible resources are both railroad alignments.

Of the remaining 72 previously recorded historic built-environment resources, 8 were determined not eligible for listing in the NRHP by SHPO and the remaining 64 are unevaluated for listing in the NRHP.

Table 1. Historic built-environment resources within or adjacent to Alternative 6 previously determined NRHP-eligible by DAHP

Count	Property ID	Property name	Address	Resource type	NRHP eligibility/ date (SHPO)	Proximity to Proposed Project area ^a
1	88798	Northern Pacific Railway: Lake Washington Beltline	Vicinity of Renton	Structure: railroad line	Eligible ^b ; 11/6/2024	Within
2	708606	Seattle & Walla Walla Railroad/Puget Sound Shore Railroad/Seattle, Lake Shore and Eastern Railway/Northern Pacific Railway Black River Junction to the Lake Washington Ship Canal	Vicinity of Renton and Seattle	Structure: railroad line	Eligible ^b	Within

^a Measured from the exterior boundary of the road ROW encompassing Alternative 6.

^b The overall railroad line was previously determined eligible by DAHP; the segment within or adjacent to Alternative 6 has not been evaluated.

In addition, one historic built-environment resource located within or adjacent to Alternative 6 was previously recorded in the KCHRI (Codiga House; KCHRI ID 493). However, this resource appears to have been demolished between 2002 and 2009 (NETR 2025). No historic built-environment resources are located within or adjacent to Alternative 6 listed in the KCLR (KCHPP 2025).

The SEIS presents the impacts analysis for Alternative 6 and the NAA.

Summary

HDR completed a desktop review of historic built-environment resources to support the SEIS for the Proposed Project. The desktop review was designed to identify previously recorded historic built-environment resources located on parcels within and adjacent to Alternative 6. The review included an archival review of WISAARD (DAHP 2025) and KCHRI.

The review found that no previously recorded historic built-environment resources are located within or adjacent to Alternative 6 that are listed in the NRHP, WHR, or KCLR. There are 74 previously recorded historic built-environment resources within or adjacent to Alternative 6. Of these, two were previously determined eligible for listing in the NRHP by SHPO; both are railroad lines. Of the remaining 72 previously recorded historic built-environment resources, 8 were previously determined not eligible for listing in the NRHP by SHPO and the remaining 64 are unevaluated for listing in the NRHP.

The NAA as described in the FEIS (City 2025) and Alternative 6 is analyzed in the SEIS to determine their potential impacts on the NRHP-eligible historic built-environment resources.

References Cited

Allen, Jason and Elizabeth O'Brien

- 2007 Historic Property Inventory Form for Property ID: 88798. July 10. On file, Washington Department of Archaeology and Historic Preservation, Olympia.

Boeing Company, The (Boeing)

- 2025 Renton Production Facility. Boeing company website. Electronic document, <https://www.boeing.com/company/about-bca/renton-production-facility#anchor1>. Accessed August 2025.

City (City of Tukwila)

- 2025 Final Environmental Impact Statement for the Allentown Truck Reroute Project. Prepared by HDR Engineering, Inc. June 9.

Crowley, Walt

- 1999 Seattle Renton & Southern Railway—King County's First True Interurban. HistoryLink.org Essay 1756. Electronic document, <https://www.historylink.org/File/1756>. Accessed August 2025.

DAHP (Washington State Department of Archaeology and Historic Preservation)

- 2025 Washington Inventory System for Architectural and Archaeological Records Data (WISAARD). Electronic document, <https://wisaard.dahp.wa.gov/>. Accessed August 2025.

KCHPP (King County Historic Preservation Program)

- 2025 Historic Preservation Viewer. Electronic document, <https://kingcounty.maps.arcgis.com/apps/View/index.html?appid=08c6e1fe041b4f7a8912e21b55219de14>. Accessed August 2025.

Luttrell, Charles T.

- 2003 Historic Property Inventory Form for Property ID: 734040. May 21. On file, Washington Department of Archaeology and Historic Preservation, Olympia.

Meany, Edmond R.

- 1923 *Origin of Washington Geographic Names*. University of Washington Press, Seattle.

NETR (National Environmental Title Research) Online

- 2024 "Historic Aerials Viewer." Last updated 2024. <https://www.netronline.com/>. Accessed June 2024.

Richards, K.

- 2005 The Stevens Treaties of 1854–1855: an Introduction. *Oregon Historical Quarterly* 106(3):342–351.

Seattle Times, The

- 1903a "Real Estate Review." February 1, p.36.
- 1903b "Bryn Mawr Land Co." Advertisement. June 17, p.4.
- 1907 Advertisement for furnished rooms at Bryn Mawr hotel. April 4, p.19.
- 1944 "500 New Homes in Skyway Park Open to Public." September 24, p.11.

Stein, Alan J. and Eleanor Boba

- 2024 Renton—Thumbnail History. HistoryLink.org Essay 688. Electronic document, <https://www.historylink.org/File/688>. Accessed August 2025.

Wilson, Gordie

- 1992 At the End of the Rainbow—Skyway: A Community of Color, Conflict and Cooperation. *The Seattle Times*, February 20. Electronic document, <https://archive.seattletimes.com/archive/19920220/1476753/at-the-end-of-the-rainbow---skyway-a-community-of-color-conflict-and-cooperation>. Accessed August 2025.

Attachment A: Figures

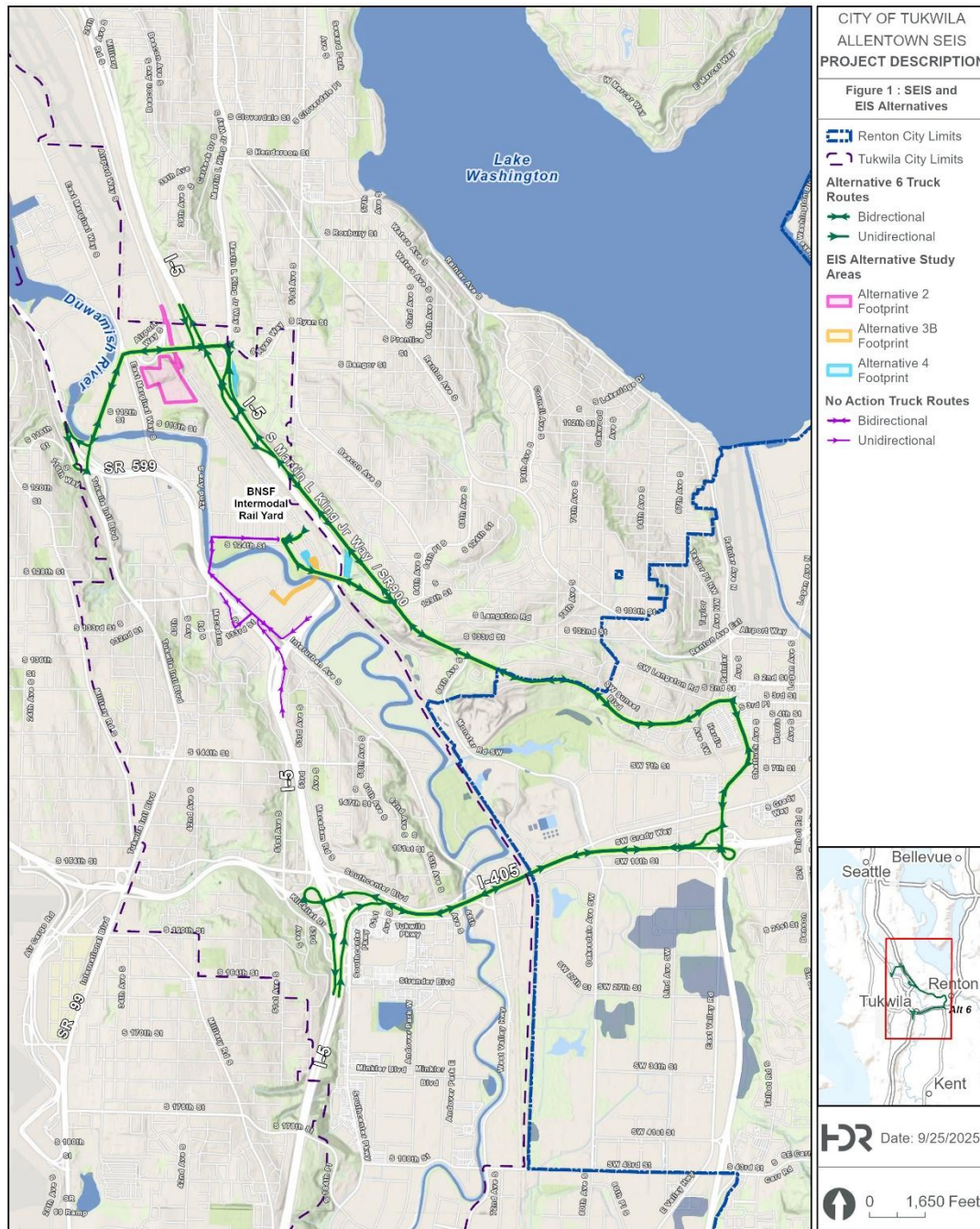


Figure 1. Project location depicting Alternative 6

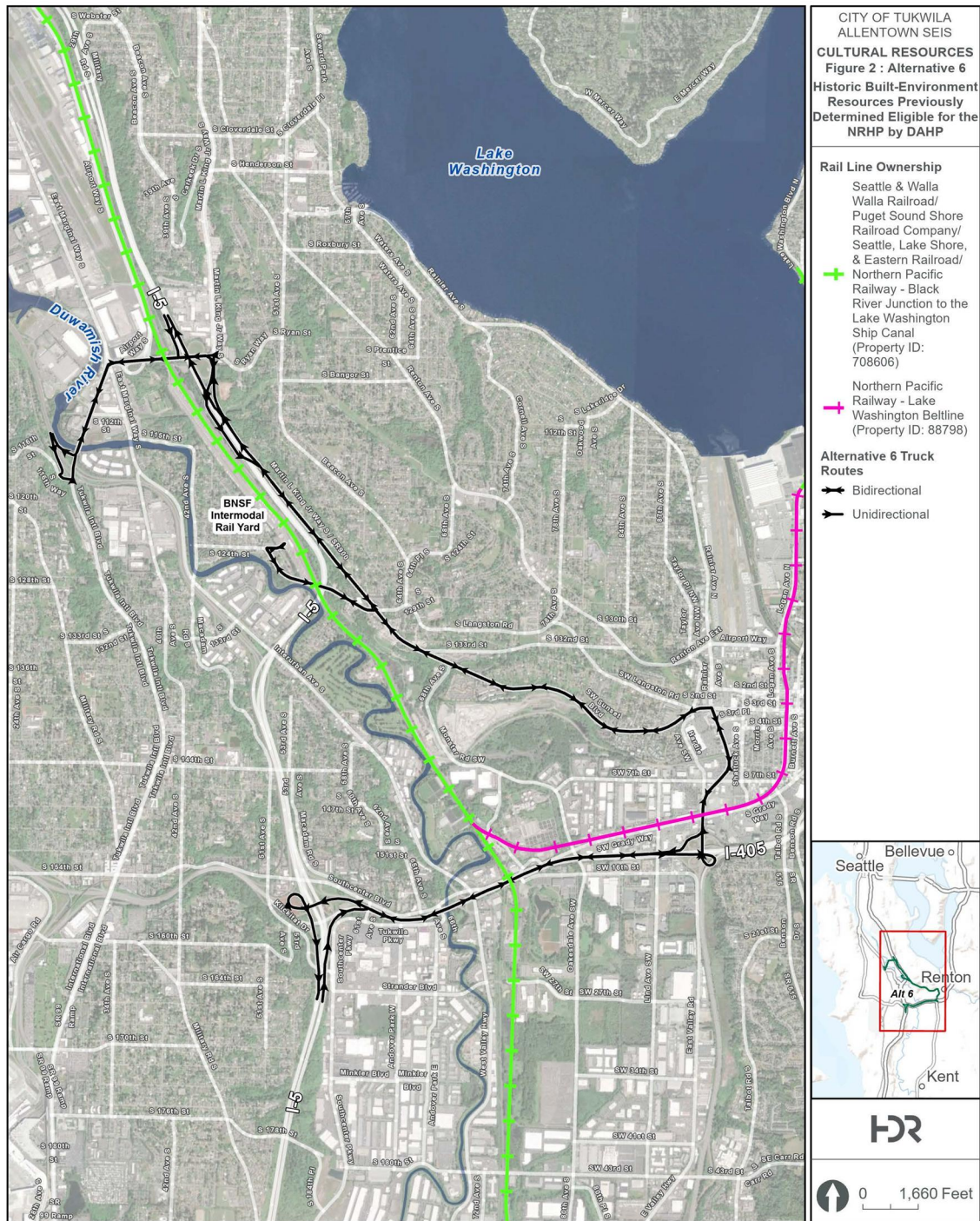


Figure 2. Historic built-environment resources previously determined eligible for the NRHP by DAHP