



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

April 13, 2017

Mr. Keith Niven, Director  
Economic Development & Development Services  
P.O. Box 1307  
Issaquah, Washington 98027-1307

In future correspondence please refer to:

Project Tracking Code: 2016-03-01635

Property: Providence Heights College Campus, 4441 228<sup>th</sup> Avenue SE, Issaquah

Re: Proposed Determination of Non-significance of Demolition

Dear Mr. Niven:

The Washington State Department of Archaeology and Historic Preservation (DAHP) is in receipt of the Proposed Determination of Non-significance (DNS) dated March 27, 2017 for the proposed demolition of the Providence Heights College Campus. The following comments are based on the documentation contained in your DNS and Environmental Checklist:

- 1) As stated in our May 4, 2016 letter to the City of Issaquah, we affirm our determination that the Providence Heights College Campus is eligible for the National Register of Historic Places. This determination was based upon the campus meeting National Register criterion A for the campus' role in the state's religious history as one of the few locations in the nation built for training and education of Catholic sisters that emanated from the Sister Formation movement earlier in the 20<sup>th</sup> century. The campus also meets National Register criterion C as an important example of the work of prominent Seattle architect John W. Maloney and as a significant and intact example of mid-20<sup>th</sup> century modernist architecture and site planning.
- 2) Section 13 (a.) in the checklist states that the property is currently owned by The City Church and "... used for religious purposes and are therefore not subject to designation as a landmark or to historic preservation or regulation under SEPA. The First Amendment to the United States Constitution and Article 1, Section 11 of the Washington Constitution protect the right to religious exercise. Applying these Constitutional protections, Washington courts have repeatedly held that the landmark or other designation of a church's property is impermissible if it creates a substantial burden on the church's religious exercise." To clarify on this point, a National Register of Historic Places designation or determination of eligibility does not result in "a substantial burden on the church's religious exercise." Listing of a religious property in the National Register, Washington Heritage Register, or local registers of historic places does not regulate land use. Listing does formally recognize a property's historic significance. Washington case law has acknowledged that landmark status does not necessarily burden a church's religious exercise and may instead be of benefit to a church. For your information, there are many examples of churches and church affiliated schools in which worship and classes are still held that are listed in the National Register of Historic Places or that have been re-purposed to other uses.



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- 3) Demolition of a National Register listed or eligible property is considered to have a significant impact on the environment. As a result, an environmental impact statement (EIS) should be prepared. The EIS should identify a range of alternatives to demolition of the campus.
- 4) If alternative scenarios to demolition are not selected for implementation, the negative impact of the demolition on the campus should be mitigated with appropriate measures that are commensurate with the loss of the resources. While the Proposed DNS mentions that the stained glass windows will be given to the Sisters of Providence, we recommend that other measures be identified and implemented in cooperation with interested and affected parties.

The above comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer (SHPO) under the auspices of the State Environmental Policy Act (SEPA). Should additional information become available, our assessment may be revised.

Finally, please note that in order to streamline our responses, DAHP requires that all documents related to project reviews be submitted electronically. Correspondence, reports, notices, photos, etc. must now be submitted in PDF or JPG format. For more information about how to submit documents to DAHP please visit: <http://www.dahp.wa.gov/programs/shpo-compliance>. To assist you in conducting a cultural resource survey and inventory effort, DAHP has developed guidelines including requirements for survey reports. You can view or download a copy from our website.

Thank you for the opportunity to review and comment. If you have any questions, please contact me at 360-586-3073 or [greg.griffith@dahp.wa.gov](mailto:greg.griffith@dahp.wa.gov).

Sincerely,



Gregory Griffith  
Deputy State Historic Preservation Officer

C: Jennifer Meisner, King County Historic Preservation Officer  
Chris Moore, Director, Washington Trust for Historic Preservation  
Eirlys Vanderhoff, Sammamish Heritage Society  
Eugenia Woo, DOCOMMO WEWA

