

April 14, 2017

Keith Niven, AICP, CEcD  
Economic Development & Development Services Director  
P.O. Box 1307  
Issaquah, WA 98027-1307

Re: Proposed Determination of Nonsignificance (Permit No. DEM 17-00002, SEP 17-00004)

Dear Mr. Niven,

On behalf of the Washington Trust for Historic Preservation, I am writing to comment on the proposed demolition of the property at 4221 228th Avenue SE in Issaquah, currently owned by Plateau Campus, LLC. Founded in 1976, the Washington Trust for Historic Preservation is a private nonprofit organization with a mission to preserve Washington's historic places through advocacy, education, collaboration, and stewardship.

The subject property was built in 1961 and was historically known as Providence Heights College. The campus is of extremely high historic significance for Washington State; the Washington Trust has been advocating for preservation of the campus since we learned of development plans for the site in late 2015. Due to its significance, we felt Providence Heights College merited our highest level of involvement; the campus was listed as one of Washington State's Most Endangered Historic Properties in 2016.

Providence Heights College represents the culmination of a nationally important movement by the Sisters of Charity Providence Sacred Heart to elevate the formal instruction of religious women to a level equivalent to the higher education long provided for male clergy. Providence Heights was an important work of Seattle Archdiocesan architect, John Maloney and marks a transitional moment in the development of Catholic sacred architecture in Washington. The college emerged during a period when theological debates raged about the proper role of Catholicism, and the Church saw the defection of many faithful during a cultural revolution that would explode in the 1960s. The sophisticated college the Sisters created on a forested knoll in Issaquah was infused with high-minded educational principles and Modern ideas about design, ornamentation, communal living, and a daily relationship with the natural environment.

The Washington Trust strongly disagrees with the City of Issaquah's proposed Determination of Nonsignificance (DNS) for this property. The demolition of this demonstrably highly significant historic campus is an extremely adverse impact to our state's historic and cultural resources. The Washington Trust further disagrees with the City of Issaquah's determination that an environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). RCW 43.21C.030(2)(c) states that municipalities must "to the fullest extent possible" include a detailed statement by the responsible official on "*any adverse environmental effects which cannot be avoided*

*should the proposal be implemented” and “alternatives to the proposed action.”* Chapter 3 of the SEPA Handbook states that an EIS is required if it is determined that “a proposal is likely to result in significant adverse environmental impacts.” According to WAC 197-11-794(1), “Significant” as used in SEPA, means a “reasonable likelihood of more than a moderate adverse impact on environmental quality.” Actions that affect historic and cultural resources is included as one of the environmental impacts on the SEPA Checklist (Item 13), and the wholesale destruction of the highly historically significant Providence Heights College campus is decidedly more than a moderate adverse environmental impact. Additionally, the size of the campus and the loss of embodied energy from its demolition is another significant environmental impact that needs to be more fully understood.

Due to the historic nature and size of the campus, the Washington Trust strongly advises the City of Issaquah to require that an EIS be completed for this site. An EIS is necessary to appropriately investigate the full impact of demolition and identify suitable and sustainable alternatives to demolition. An EIS would also help determine appropriate mitigation measures in the event that demolition becomes inevitable.

Regarding the submitted SEPA checklist and the City of Issaquah staff evaluation of that checklist, the Washington Trust would like to comment more specifically on how demolition of this property qualifies as a significant adverse impact under Items 13 and 6.

### **Historic & Cultural Significance - SEPA Item 13**

The Providence Heights College campus has been deemed eligible for listing in the National Register of Historic Places. It also meets several criteria for designation on the local City of Issaquah Historic Register. While ownership of the campus by a religious entity may prevent it from receiving local or national designation, this does not negate the fact that this property is of extremely high historic and architectural significance. Further, while the owner of the campus may not be subject to the local landmark ordinance, *the owner is subject to SEPA review*. The applicant erroneously states in their checklist that they are not subject to SEPA regulation.

While the applicant acknowledges that the campus has been deemed eligible for listing in the National Register, their application dismisses the historic significance of the campus, and the City of Issaquah’s staff evaluation also fails to acknowledge the exceptional significance of the campus. As a public document, the SEPA checklist should accurately and completely convey the outstanding historic significance of this site so the full consequence its loss is clearly and publicly disclosed.

Additionally, in the opinion of the Washington Trust, the City of Issaquah worded their evaluation to suggest the landmark nomination for the campus submitted by the Sammamish Heritage Society was withdrawn due to lack of significance. This is misleading. Withdrawal of the nomination occurred solely based on the threat of legal action, which should be acknowledged.

The staff evaluation of the SEPA checklist notes that the owner has offered to salvage the stained glass windows, but under this current proposal, the City is currently *not formally requiring mitigation* for this demolition. Without a specific “Mitigated Determination of Nonsignificance,” salvage of the windows appears to be only on “good faith,” which is not acceptable. The City of Issaquah should formally require much more extensive, meaningful mitigation measures if demolition of the campus becomes imminent. While no mitigation can truly compensate for the loss of historic structures as significant as this campus, the Washington Trust suggests the following mitigation be required:

1. A substantial mitigation fund to go toward developing a more robust historic preservation program in the City of Issaquah and to potentially provide grants for the preservation and restoration of other historic structures. Due to the size and significance of this campus, the Washington Trust recommends those funds total at least \$750,000.
2. At least one, preferably multiple, public open house events granting the community access to the campus, chapel, and grounds prior to demolition. This would serve as an educational benefit for the community, residents, and the many individual parties who have expressed a dedicated interest in the site.
3. Extensive photo documentation of the campus that meets the standards set forth by the National Park Service for the Historic American Buildings Survey and Historic American Engineering Record (HABS/HAER).
4. Salvage of particularly significant portions of the campus and chapel as identified by qualified professionals in the fields of art and architecture. A complete survey of remaining significant artifacts and architectural components of the campus should be completed to determine the scope of salvage material. Based on the initial information available to the Washington Trust through photographs, salvage should include *at a minimum*, but not be limited to: the stained glass windows, the chapel shrine mosaics, the mosaic Stations of the Cross in the chapel, any other remaining art from the Sisters of Providence’s extensive art collection, significant light fixtures, the chapel altar, and the chapel baldachin.

The City of Issaquah Comprehensive Plan (adopted 1995, amended 2016) outlines two specific goals under the “Cultural Element” chapter that involve protecting historic resources:

Goal B - Protect historic resources to enhance the City’s quality of life, unique sense of place and economic vitality.”

Goal C - Preserve and enhance the natural and built environments that reflect Issaquah’s unique sense of place.

Under Goal B, the plan goes even further to say that the City will “Support efforts to secure space for the *preservation of Issaquah’s physical heritage*” (emphasis added, C-Policy B3). The Washington Trust agrees that historic structures are an integral part of establishing a sense of place for a community, which is why preservation of this campus is so important to us and many other organizations and individuals.

We respectfully request that the City follow the goals set forth in its own comprehensive plan and do everything within its power to protect Providence Heights College campus. The SEPA process was established to protect the environment of our region, which includes the historic and cultural resources that contribute to our shared heritage and add to our quality of life. The City of Issaquah has the purview to use the SEPA review process to protect this exceptionally important historic resource. We ask the City to prioritize the needs of the community at large and work with the owner to find an alternative to demolition of this property.

#### **Energy and natural resources - SEPA Item 6**

Under section A.6, “Energy and natural resources,” the applicant lists under item (c.) that “No measures to conserve energy are necessary” because the proposed action is a demolition. The Washington Trust for Historic Preservation argues that this assertion is incorrect because it is in fact necessary to address the embodied energy present in this campus.

The Pacific Northwest culturally prioritizes environmental appreciation and protection. However, one of the areas in which our region falls short in the achievement of goals related to sustainability and environmental protection is limiting the amount of waste we produce through building demolition. According to the EPA, 534 million tons of construction and demolition debris were generated in the United States in 2014, which is more than twice the amount of municipally-generated waste. Ninety percent of that waste is due to demolition debris, only ten percent is the result of construction debris. Additionally, there is a less visible adverse environmental impact that is a result of building demolition: the loss of embodied energy.

Embodied energy is defined in the Revised Code of Washington (RCW) as: “the total amount of fossil fuel energy consumed to extract raw materials and to manufacture, assemble, transport, and install the materials in a building.” When a building is demolished, a certain amount of waste is produced as a tangible addition to our landfills. However, the full environmental impact of a demolition, especially one as massive as Providence Heights College, cannot be fully understood until the embodied energy is calculated. The applicant’s SEPA checklist characterizes the campus as “predominantly one structure” (A.11), which is inaccurate and gives the impression that the demolition of this facility would be a smaller, less impactful undertaking than it actually will be. The city’s proposed DNS adopts this claim, noting that “the building is predominantly one structure, though in many cases appears as a series of buildings

connected by fully enclosed breezeways.” This statement is either intended to intentionally mislead or demonstrates an inability to accurately assess building composition. The campus is in fact composed of eight connected building units, seven of which have distinct massing, orientation, and floorplans. The only building unit that can legitimately be considered an extension of another is Unit D North, which is connected to Unit D South (the central chapel). A full EIS must be completed for this substantial site to fully understand the impact of demolition and the loss of embodied energy.

In King County’s 2013 *Comprehensive Solid Waste Management Plan*, the strategies of which the City of Issaquah officially adopted through an interlocal agreement, the first policy listed in Chapter 3, “Waste Prevention and Recycling,” is:

Achieve Zero Waste of Resources – to eliminate the disposal of materials with economic value – by 2030 through a combination of efforts in the following order of priority:

- a. Waste prevention and reuse
- b. Product stewardship, recycling, and composting
- c. Beneficial use

Additionally, in the City of Issaquah Comprehensive Plan under the “Utilities And Public Services Element” chapter, Goal G refers to managing waste in a way that will “preserve environmental quality through pollution prevention and *resource conservation* and *reduce climate impacts*” (emphasis added). The preservation and future reuse of this campus would be the best way to conserve the resources already spent on its construction and limit demolition waste, but also reduce negative climate impacts by acknowledging the loss of embodied energy as a major contributor to negative climate impacts.

With waste prevention being the highest priority for waste management in King County and the City of Issaquah’s stated goals to conserve resources and reduce climate impacts, we urge the City of Issaquah to further examine the far-reaching effects of demolishing this campus. These buildings are in good condition and have many more years of useful life in them; it is short-sighted for the city to allow demolition of these buildings without consideration and analysis of the full impact.

Finally, the Washington Trust believes demolition of the campus should be considered in light of the Issaquah School District’s proposed construction of a high school and an elementary school at the site. The Issaquah School Board has approved acquisition of the site through eminent domain and procedures for implementing this transaction are underway. Viewed in this light, demolition of the Providence Heights Campus would not occur “but for” the action taken by the school board to acquire the site. From this standpoint, an EIS should encompass not only the specific action to demolish the existing buildings, but should necessarily consider the school development slated for the site in order to fully capture the action’s impact.

The demolition of this campus *will have a significant adverse impact* due to its exceptional historic and community significance and the negative environmental effects of the demolition itself. We urge the City of Issaquah to require that an EIS be completed to more fully examine the effects of this demolition and to thoroughly explore alternatives that prioritize historic preservation. Thank you for the opportunity to comment on this important matter.

Sincerely,



Jennifer Mortensen  
Preservation Services Coordinator

CC: Eirlys H. Vanderhoff, Vice President, Sammamish Heritage Society  
Jennifer Meisner, Historic Preservation Officer, King County Historic Preservation Program  
J. Todd Scott, Preservation Architect, King County Historic Preservation Program  
Greg Griffith, Deputy State Historic Preservation Officer, Washington State Department of Archaeology & Historic Preservation  
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