



King County

Department of Natural Resources and Parks
Historic Preservation Program
201 S. Jackson Street, Ste. 700
Seattle, WA 98104

April 13, 2017

[sent by electronic mail]

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

Dear Mr. Niven:

This letter is in response to notice of a proposed determination of non-significance (DNS) being issued for the demolition of several buildings located on the property at 4221 228th Avenue SE, otherwise known as Providence Heights College. The City of Issaquah permit numbers are DEM 17-00002 and SEP17-00004. The City has erred in determining demolition of the campus would not have a probable significant adverse impact on the environment, due to the high degree of historic and cultural significance associated with the campus and its buildings.

The property's significance lies in its associations with the history of women's education in the United States and in its architectural design and method of construction. Completed in 1961, Providence Heights College consists of several interconnected major buildings, additional minor auxiliary buildings, associated parking areas, walkways, and natural forested areas. The entire campus, particularly the interconnected buildings and open space around them, is significant for its exceptional role in elevating the formal educational instruction of religious orders of women to a level equivalent to the higher learning long provided for male members of the clergy. It was only the second institution built expressly for the collegiate professional and spiritual instruction of religious orders of women.

The campus is also significant for its remarkable union of educational, residential, and spiritual buildings, with Modernist styling and bold engineering. Designed by nationally recognized Seattle architect John W. Maloney, the campus is significant in Maloney's body of work and is a distinguished example of period ecclesiastical architecture in the Pacific Northwest.

The final staff evaluation provided with the proposed DNS and the SEPA Checklist submitted by Plateau Campus LLC make several incorrect and misleading statements. Both indicate that the structure has not been designated as a historic structure and is not listed in any preservation register, therefore it is not historically significant. This property has not proceeded through the formal local designation process only because it is owned by a religious organization and Washington case law has held that landmark designation is impermissible when a property is owned by a religious organization and is used to further the organization's mission. This property is listed in the City of Issaquah's Historic Resources Inventory and our professional

historic preservation staff has determined that it is eligible for designation as a City of Issaquah Landmark. Furthermore, staff at the Washington Department of Archaeology and Historic Preservation has determined the property is eligible for listing in the National Register of Historic Places. The fact that this property has not been designated a City of Issaquah Landmark or listed in the National Register of Historic Places due to its ownership by a religious institution does not diminish its historic and cultural significance.

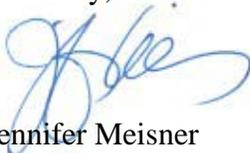
Other aspects of the SEPA Checklist are inadequately addressed. These include an explanation of the methods that were used to assess the potential impacts to cultural and historic resources, and the proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to these resources. The applicant indicates that stained glass windows in the chapel will be removed and given to the Sisters of Providence. It does not state if the Sisters of Providence are willing recipients of these windows, where the windows will go, or if they will be reinstalled in a place where members of the public and citizens of Issaquah in particular, will continue to have viewing access to them. This commitment to saving the stained glass windows only preserves one character defining element of this property. Saving the windows, while important, does not begin to mitigate for the loss of the historically and architecturally significant buildings, materials, or the important spatial arrangement of the campus.

We recommend that the proposed DNS be terminated, and that an environmental impact statement (EIS) be prepared for the demolition of buildings on this property. An EIS will provide a fuller explanation of alternatives to demolition of this locally and nationally significant historic resource. An EIS will also include identification of mitigation measures that will more effectively preserve the heritage of Issaquah and King County. A recent example of mitigation for the loss of a historically significant resource in the City of Issaquah is the Anderson Farmstead House in Confluence Park. Demolition of this property was mitigated by the City of Issaquah's establishment of a historic resources mitigation fund, into which the City contributed \$250,000 to be used for identification and protection of historic resources in Issaquah.

If the City does not require an EIS for the proposal to demolish the Providence Heights Campus, then we recommend additional mitigation for the proposed demolition of this historically significant property. Mitigation could include, but is not limited to the following: extensive photo documentation of the building and grounds; appropriate salvage or recycling of building materials; a public open house for the community to see the campus before it is demolished; and a contribution equal to the cost of demolition to the City of Issaquah's historic resources mitigation fund.

If you have any questions, please do not hesitate to call me at (206) 477-0384.

Sincerely,



Jennifer Meisner
Historic Preservation Officer

Mr. Keith Niven
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cc: Christen Leeson, Senior Planner, City of Issaquah
Chris Wright, Project Oversight Manager, City of Issaquah
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Greg Griffith, Deputy State Historic Preservation Officer, DAHP
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