



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

November 18, 2016

Mr. Bryan Hampson, Director
City of Kenmore
Development Services
PO Box 82607
Kenmore, Washington 98028-0607

In future correspondence please refer to:
Project Tracking Code: 2016-11-08324
Property: Saint Edward Seminary Historic District, 14445 Juanita Drive NE, Kenmore
Re: Lodge at Saint Edward DEIS

Dear Mr. Hampson:

The Washington State Department of Archaeology and Historic Preservation (DAHP) is in receipt to the Draft Environmental Impact Statement (DEIS) for the proposed Lodge at Saint Edward. The above referenced project has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under the auspices of the State Environmental Policy Act (SEPA). Our review is based upon documentation contained in the DEIS and appendices.

- 1) In general, we concur with and support the conclusions and recommendations made in the DEIS regarding the impacts of the proposal on cultural and historic resources in the project area, primarily the St. Edward Seminary Historic District including its contributing buildings, structures, and landscape features.
- 2) As you are aware the Washington State Historic Preservation Officer and DAHP have for several years supported and encouraged efforts to preserve the Historic District and rehabilitate the Seminary Building. We commend the City of Kenmore, the Washington State Parks and Recreation Commission, the state's historic preservation community, and the public in general who recognize the value of this historic resource to our community and have worked to achieve a preserved St. Edward Seminary Historic District for the enjoyment and benefit of the public.
- 3) In view of our comment #2, we recommend *against* the "No Action" alternative. Clearly this alternative would lead to continued deterioration of the Seminary Building and perhaps its eventual loss with the attendant waste of resources, diminishment of the public's experience of the Park, missed economic opportunities, and loss of a significant heritage property.
- 4) We support the recommendation that all rehabilitation work in the Historic District be designed and implemented to meet the Secretary of the Interior's Standards for Rehabilitation (Standards). We make special note that this recommendation should also apply to interior rehabilitation work since the Seminary Building contains significant interior spaces and features. To this end, we recommend that proposed rehabilitation plans be provided to the SHPO and King County Historic Preservation Officer for review and comment.



- 5) We also reiterate adherence of rehabilitation work to the Standards enable the project proponent to take advantage of the federal Investment Tax Credit (ITC) preservation incentive. More information about the ITC program should be directed to DAHP's Historical Architect Nicholas Vann at Nicholas.Vann@dahp.wa.gov or 360-586-3079.
- 6) Some questions remain for us about how the automobile parking will be provided. While we support the proposal that there will be "no net loss" of parking spaces, we do recommend that the proposed parking "structure" be sited and constructed to minimize impacts to cultural and historic properties and be designed to be compatible with the district's historic character. Also, should a parking structure be built that would require ground disturbing work, steps should be taken to avoid affecting archaeological resources. To this end, please contact DAHP's Assistant State Archaeologist for Local Governments Gretchen Kaehler at Gretchen.Kaehler@dahp.wa.gov. or 360-586-3088 and affected Tribes.
- 7) We agree that negative impacts to cultural and historic properties resulting from project implementation should be mitigated. While we note the proposed mitigation measures in Section 3.9.3, we recommend that specific mitigation measures be crafted and agreed upon after project impacts and the affected resources have been more clearly defined.
- 8) Finally, we appreciate receiving copies of any correspondence or comments from concerned tribes and other parties that you receive about this proposal. Should additional information become available, our comments be revised.

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 greg.griffith@dahp.wa.gov or 360-586-3073.

Sincerely,



Gregory Griffith
Deputy State Historic Preservation Officer

C: Cecile Hansen, Duwamish Tribe, Chair
Jennifer Meisner, King County, Historic Preservation Officer
Chris Moore, Washington Trust for Historic Preservation
Steve Mullen-Moses, Snoqualmie Nation, Archaeology & Historic Preservation
Alex McMurry, Washington State Parks
Richard Young, Tulalip Tribes, Cultural Resources

