

SEPA COMPLIANCE DOCUMENT

The Historic Trust Providence Academy Site Laundry and Boiler Buildings Removal

The Laundry and Boiler buildings at the Providence Academy site are slated for removal due to safety concerns and the lack of economically viable rehabilitation options. Listed in the National Register of Historic Places in 1978, both buildings are landmarks ancillary to Providence Academy, for which construction began in 1873 and was originally known as the House of Providence. Their significance is derived from associations with the groundbreaking, widely influential, and long-lasting work in social services, medicine, and education instituted by the Sisters of Providence, led by Mother Joseph of the Sacred Heart, and carried out for many decades at the site. As part of its ongoing stewardship of the Academy, The Historic Trust will continue its work to more thoroughly document the history and architecture of the c. 1888 Laundry and 1910 Boiler as mitigation for their removal, include information about them in interpretive exhibits and tours, and retain and potentially re-use sample building materials, among other actions described later in this report.

The concept of mitigation in this context stems from Section 106 of the National Historic Preservation Act of 1966. The Section requires that a project utilizing federal dollars must take into account the likely effects of the actions on cultural resources. Should those impacts be adverse, the originating agency is responsible for mitigating them. This concept has become generalized throughout cultural resource conservation efforts in the United States even when federal dollars are not involved, such as with this project.

In accordance with the provisions of City of Vancouver (COV) Ordinance No. M-3833 establishing a Planned Action Development for the Vancouver City Center Vision (VCCV) Subarea Plan of 2007, and the Supplemental Environmental Impact Statement (SEIS) related thereto, The Historic Trust presents the following information regarding the need for removal of the buildings and proposed mitigation for their removal. Attachment A of the VCCV, specifically addresses required mitigation for cultural and historic resources in SEIS Chapter 8.

Mitigation is also addressed in the COV's municipal code chapter 20.510, which contains guidelines for management of Heritage Overlay District Number One, the site of Providence Academy. Furthermore, Section 20.510.030, Subsection C of the chapter addresses circumstances surrounding "Permission for removal of a registered building." The proposed removal of the Laundry and Boiler meets the criteria therein of the buildings being "so dilapidated or damaged, whether from damage by fire or other elements or from natural deterioration, that it is unusable and cannot be reasonably repaired or restored."

Reasons for Building Removal

The Historic Trust sought a declaration of "unfit" status from the COV for these buildings out of concern for their unsafe status due to extreme deteriorated conditions and the financial infeasibility of rehabilitating them for any purpose. Both buildings meet the COV's definition of "unfit" buildings, as affirmed by the Building and Fire Code Commission at a public hearing on February 13, 2020, and cannot feasibly be rehabilitated.

The evaluation is drawn from findings in the 2012 *Academy Due Diligence Study* compiled by SERA Architects, Inc., a firm well-known for its expertise with historically-appropriate rehabilitation of older buildings, for The Historic Trust (then the Fort Vancouver National Trust), as well as from contemporary visual observation of existing conditions, conducted as reasonably possible considering the known unsafe circumstances. The 2012 due diligence report was commissioned by the Trust as a precursor to the organization's purchase of the property in 2015. Among the parties contributing to the study at the time were KPFF Consulting Engineers, which prepared the Structural Narrative. Structural engineer Mark Hughes, a principal of Kramer Gehlen Associates, provided an updated evaluation on January 6, 2020 based on visual observations conducted in December 2019, which is attached.



Laundry Building west elevation

Both the Laundry and Boiler Buildings were extremely deteriorated at the time of the 2012 due diligence study and have not been occupied since c. 1966 when Providence Academy closed as a school. Nonetheless, The Historic Trust determined at the time of the study to consider the possibility of rehabilitation and re-use, and commissioned "light" and "moderate" proposals for renovation at the same time as for the primary Academy building. Despite the unlikelihood of finding new purposes for the buildings given the resulting very high per square foot cost of renovation, the Trust worked with realtors to show the buildings to potential renters and developers in search of workable concepts. No viable opportunities were discovered and the Trust board opted to focus on the immediate extensive physical and historic rehabilitation needs of the Academy, as well as on the long-term needs of the building.

Since purchase of the property in 2015, the Trust has unremittingly attempted to physically secure both the Laundry and Boiler buildings from public entry and has prominently posted "no trespassing" signs. However, there has been clear evidence over the years of individuals nonetheless breaking in for the presumed purposes of shelter seeking and curiosity. The organization has been concerned about people becoming injured due to unsafe interior conditions, and about the possibility of prowlers lighting fires, failing to control them, and having exits blocked by flames or rubble. Beyond the leaving behind of trash, some of the interior deterioration has been exacerbated by the actions of intruders. The



Boiler Building east elevation

Trust does engage a security service which patrols the site intermittently on changing schedules and the organization's staff maintains a watchful presence but people have still attempted to enter and at times succeeded.

The buildings have the following specific defects as defined in VMC Chapter 17.32, Unfit Buildings and Premises Code, 17.32.040 sections A, B, D, F, I, subsection 1, and M. VMC 17.32.040 sections A, B, D, F, I, subsection 1, and M. Furthermore, both buildings are economically unfeasible to rehabilitate, as noted later in the report, and more specifically in the attached economic analysis and pro formas prepared by art historian and historic preservation professional Jessica Engeman of Meritus, a development and consulting firm which specializes in historic rehabilitation.

17.32.040 A.

Whenever any door, aisle, passageway or other means of exit is not of sufficient width or size or is not so arranged as to provide safe and adequate means of exit in case of fire or panic.

Laundry – Because the building is not stable and presents significant danger of the second floor collapsing, all of the exterior doors are locked with padlocks and the first floor windows and some second floor ones are barricaded to discourage entry. When people force an entry, all other exits are blocked. An interior staircase has many broken treads, is unstable and impassable.

Boiler – Because the structure was mostly destroyed in a fire, the interior is not usable, the exterior doors are locked with padlocks and in some cases barricaded, and the windows are barricaded to discourage entry. When people force an entry, all other exits are blocked.

17.32.040 B.

Whenever the walking surface of any aisle, passageway, stairway or others means of exit is so warped, worn, loose, torn or otherwise unsafe as to not provide safe and adequate means of exit in case of fire or panic.

Laundry – An interior staircase has many broken treads and is unstable; the floors in general are greatly worn and are warped and impassable in many places.

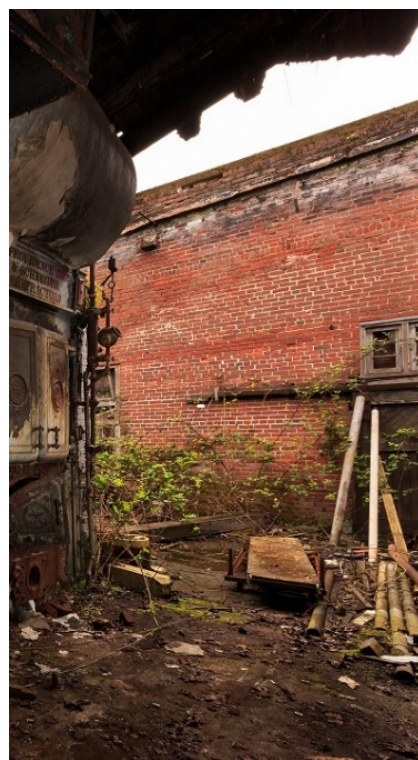
Boiler – Cracks in the concrete floor caused by time and the impact of the roof falling in have created unsafe walking surfaces within the structure.

17.32.040 D.

Whenever any portion thereof has been damaged by fire, earthquake, wind, flood, or by any other case, to such an extent that the structural strength or stability thereof is materially less than it was before such catastrophe and is less than the minimum requirements of the Building Code for new buildings of similar structure, purpose, or location.

Laundry – Significant portions of the roof are missing due to wind damage which has resulted in significant water damage to the interior of the structure.

Boiler – The roof of the structure caved in as a result of a pre-2012 fire.



Boiler Building interior looking northwest indicating missing roof

17.32.040 F.

Whenever any portion or member or appurtenance thereof is likely to fail, or to become detached is dislodged, or to collapse and thereby injure persons or damage property.

Laundry – Many portions of the interior ceilings and walls have fallen down due to general age and the incursion of moisture, and more are cracked and liable to fall at any time. The exterior brick at the southeast corner of the building has experienced significant loss of mortar and will continue to fail.

Boiler – Cracks in the concrete floor caused by time and the impact of the roof falling in have created unsafe walking surfaces everywhere within the structure.

17.32.040 I.

Whenever the dwelling, building or structure, or any portion thereof, is likely to partially or complete collapse because of:

1. *dilapidation, deterioration, or decay*

Laundry – The entire building has experienced dilapidation, deterioration, and decay over approximately 54 years of non-use. The roof, walls, and the entire second floor and attic are at a high risk of collapse.

Boiler – The entire structure has experienced dilapidation, deterioration, and decay over approximately 54 years of non-use. Due to fire, the roof is gone and the interior open to the elements.



Laundry Building southeast corner detail of deteriorated brick

17.32.040 M.

Whenever the dwelling, building, or structure has been so damaged by fire, wind, earthquake or flood, or has become so dilapidated or deteriorated as to become: 1. An attractive nuisance to children; or so as to 2. Enable person to resort thereto for the purpose committing unlawful acts, including but not limited to, trespass or unlawful burning.

Laundry and Boiler – The dilapidated and deteriorated buildings have attracted numerous instances of trespass during Trust ownership, despite stringent efforts to discourage and prevent entry via no trespassing signage, secured windows and doors, and scrutiny by staff and security.



Laundry Building interior showing tent left behind by person experiencing homelessness

Economic Unfeasibility of Rehabilitation

Consultant Jessica Engeman of Meritus was retained to analyze the possibility of economically-viable rehabilitation for both buildings. Her report and accompanying pro formas are attached. Her findings are that no economically feasible options for rehabilitation and reuse exist.

Mitigation Measures in VCCV SEIS Chapter 8 – Cultural and Historic Resources

VCCV SEIS Chapter 8 Section 8.3 concerning Archaeology and Historic Structures addresses mitigation measures for such adverse impacts on the site as the removal of the National Register of Historic Places-listed Laundry and Boiler buildings. The Historic Trust will mitigate the removal of the buildings at the Academy site in the following ways.

Archaeology

The Providence Academy site has a high probability of below ground cultural resources. To mitigate adverse impacts on any associated with the Laundry and Boiler buildings, the Historic Trust proposes to hire the firm of Archaeological Investigations Northwest (AINW) to assist with VMC 20.710 compliance. AINW is already very familiar with the Academy site and associated downtown area through previous consulting projects. In the event of any unanticipated discoveries during removal of the buildings, the Trust will follow mandated procedures to halt activity and notify the city Planning Official and Washington Department of Archaeology and Historic Preservation.

Historic Buildings

Attachment A of the VCCV addresses required mitigation for cultural and historic resources in Chapter 8 of the SEIS. The following points pertain to the required mitigation measures.

1. Impacts to historic buildings should be avoided or minimized through project redesign.

N/A – The buildings are designated for removal for reasons of safety and economic unfeasibility of rehabilitation; project redesign is not applicable.

2. As mitigation for individual historic buildings....approaches to treatments should follow the Secretary of the Interior's Standards...The standards....promote protection of the historic building by, in hierarchical order, preservation, rehabilitation, restoration, or reconstruction.

N/A – The buildings are designated for removal for reasons of safety and economic unfeasibility of rehabilitation. Therefore, none of the levels of treatment are applicable.

3. If direct or indirect impacts are unavoidable, the harm can be minimized through the implementation of measures including, but not limited to, the following:
 - a. Recordation of significant buildings to meet Historic American Buildings Survey level standards
 - The Historic Trust proposes to document the buildings to the Washington State standards for an intensive level inventory form and submit the forms to the DAHP WISAARD online database.
 - b. Research historic buildings and make recommendations for NRHP eligibility.

- N/A – The Laundry and Boiler buildings are already listed in the National Register of Historic Places.
- c. Conduct detailed surveys and inventories
 - N/A – The Academy site is listed in the National Register of Historic Places. No additional survey or inventory work remains. Additional historic research pertaining to the site will, however, be continued on an ongoing basis.



Sample display concept for Providence Academy Interpretive Center

- d. Public education displays and interpretation
 - The Historic Trust will interpret the history of the Academy site and other local properties constructed and owned by the Sisters of Providence in support of their social service, medical, and educational missions at the Interpretive Center inside Providence Academy (now in the planning and fundraising stages) and other logical locations inside the building. This work will include the Laundry and Boiler buildings, along with other buildings previously on the site, activities of the Sisters of Providence on the site and other local properties previously owned by the order, such as the Fruit Valley-area farm and the downtown Vancouver blocks to the south of the Academy previously



Sample display concept for Providence Academy Interpretive Center

- owned by the Sisters. Expanded historical information about the operations of the Academy and tremendous lasting legacies of the Sisters local work will be added to The Historic Trust’s website.
- The Trust will retain samples of the building materials for its collections and will make some available to other relevant collections. Archived materials will also be considered for potential re-use in future interior rehabilitation of the Academy.
- The Trust will submit a biography of Boiler Building architect Robert Tegan to the online Washington architect archives maintained by DAHP.
- The Trust will work with neighboring property developer Marathon to potentially incorporate historic building materials into their Aegis residential and commercial project buildings and grounds.
- Exploration of options for stabilization and retention of the smokestack proceeds.

- e. Funding for cultural resource protection and other historic preservation activities
 - The Historic Trust continues robust fundraising for preservation, interpretation, and long-term stewardship of Providence Academy.

- 4. The design materials that are used during restoration or rehabilitation of a building should be consistent with the historic materials and period of construction.
N/A – The buildings will not be restored or rehabilitated.

- 5. New building facades
N/A - New building facades are not part of the undertaking.

- 6. Historic storefronts
N/A – Historic storefronts are not part of the undertaking.

- 7. The City of Vancouver will work with the Clark County Historic Preservation Commission for any future expansions of existing or creation of new Historic District Overlays.
N/A – These actions do not fall under the purview of The Historic Trust.

- 8. The City of Vancouver will encourage the restoration and rehabilitation of historic buildings by actively promoting current historic preservation tax incentives.
N/A – These actions do not fall under the purview of The Historic Trust.



Sample display concept for Providence Academy Interpretive Center

Centered around more thorough publicly-available documentation of the local work of the Sisters of Providence and the history and architecture of the Academy building specifically, these mitigation measures will result in a more complete story being told about the Academy site, and other local properties formerly owned by the order. Original materials from the Laundry and Boiler will be retained and interpreted on site. Historical information will be more readily available to the broad public through The Historic Trust's website and other on-line sources.

Though it is not possible to rehabilitate and reuse the Laundry and Boiler buildings, The Historic Trust is committed to preserve the historical record through the site-focused mitigation outlined in this report, and advance its rehabilitation of Providence Academy.



Providence Academy south elevation. Bob Holcombe photograph.