



April 19, 2021

King County (Shoreline) Landmarks Commission
Attn: Sarah Steen
King Street Center
201 S. Jackson St.
Suite 700
Seattle, WA 98104

Subject: Response and Further Clarification on Naval Hospital Chapel Landmark Status

Dear Ms. Steen and Commissioners:

Thank you for taking the time to respond in detail. We appreciate your diligence and effort to review the documents we referred to. However, we need to further clarify in a response to your statements there.

First, in your discussion of the impact of the new information, that is the Fircrest School Land Use Assessment, you seem to have ironically missed our point and reinforced it simultaneously.

The fact that the Fircrest School Land Use Assessment DOES NOT mention any desired uses for the Landmarked Forest property on the Eastern Edge demonstrates our exact point:

The Fircrest School Land Use Assessment does not express any official basis for the DSHS-suggested need for a potential parking lot, office building, possible medical facility, or any other use in this part of the Chapel grounds whatsoever! Therefore, there was no reason for the Commission to change their original decision.

Additionally, the possibility raised in two proposed options in the Fircrest School Land use Assessment of serious impact to the Chapel Landmark (of loss of the majority of the valuable forest WEST of the Chapel), makes preserving the eastern portion even more important.

The third option of placing the nursing facility at the North-east corner of the Fircrest site is the PREFERRED OPTION of the Nursing staff. That is because it places this facility closer to the rest of the functions of the Campus Facilities. Functionally, it would be more efficient. It would have no impact on the Chapel. However, DSHS's preferred option is the one that would remove the most trees and have the largest footprint West of the Chapel. Hence our increased anxiety over preserving the trees on the East side.

Since the Fircrest School Land Use Assessment was not presented to the Commission by DSHS at their Reconsideration hearing, and SPS was not made aware of its existence, it does represent new information.

The newly released Fircrest School Land Use Assessment discusses the Chapel as a possible site for the National Register of Historic Places, and the effort to preserve this site. Another document, the 2017 "Fircrest School Campus Master Plan Phase III," also includes language stating that the Chapel is a possible site for the National Register of Historic Places. This is information the Commission did not have. Here is the link:

https://www.dshs.wa.gov/sites/default/files/FSA/capital/MasterPlan/FircrestSchool/2017-06-30-Fircrest-Master%20Plan_2160192.pdf.

Regarding the Governor's new executive order to state agencies requiring them to be alert and responsible for any historic sites that come under their agency:

We disagree with your observation that the Governor's new order does not apply to this issue since it does apply to DSHS and DNR, both of which are state agencies. This is DNR land and while the Governor's order is indeed not addressed to the Landmarks Commission (and was not brought up at any of our hearings and is therefore NEW information), it is key to the Commission's decision in this case. This is because it does apply to the DNR land and Chapel, which sits on its property, and to DSHS, which is responsible for managing their facilities for the State and the People of Washington.

The City of Shoreline has little jurisdiction over anything at Fircrest other than having a designated member of your commission for this matter. They will have some responsibility for any permitting for any new development and Land Use matters and they lease a small area in the far Southeast corner for a dog off-leash park., but all responsibility per the Governor's Executive decision should still apply to a State Property. Other State-owned properties in Shoreline, such as the WSDOT facility, are not regulated by the City. They are regulated as State facilities. Therefore, any artifacts, cultural or historic treasures, in particular, those of a Tribal significance, must be identified and those parties that have oversight of such matters MUST be notified and involved. This should apply to the State Archaeologist office, in particular.

And furthermore, since this Executive Order is, as you say, a continuation of a previous order, why was it not made clear in the previous two hearings when our nomination was being considered originally?

We must also take exception to your thought that the Fircrest School Land Use Assessment does not have anything to do with DSHS Reconsideration. This study was created specifically to assess siting for future nursing facilities, a behavioral health facility and the long-term plan for the entire campus property. So, while the consultants did not study the Chapel's eastern boundary for a site to build facilities, they did indeed study the future of the entire campus and they draw heavily on the 2017 "Campus Master Plan Phase III."

Our point is to express that this new study and the Governor's directive are direct and immediate

influences on the future of this wonderful historical building and site. They also have potentially significant consequences for the landmark as a whole and what it was intended to represent to the founders. We see these new pieces of information as having significant import on the consideration of this important landmark.

Based on the Commissioners guidelines we do not see new information presented by those opposed to the original commission's ruling.

Regarding our reply letter to the Landmarks Commission pertaining to DSHS request for Commission reconsideration of your February decision: We requested and were told there would be an opportunity at the last meeting for rebuttal of the DSHS request to change the Commission's ruling. The agenda called for a rebuttal opportunity. Instead, we were given back-to-back opportunities for public comment. We were denied the right to a rebuttal.

Questions about this next Agenda:

We ask for information about how this item is being handled at this next meeting. Do we as the original nominators get a chance to make our request for including, in the record, this new information and reconsideration of, the decision as discussed above?

In conclusion, we restate that DSHS had no basis for Reconsideration. They did not meet their burden. It is our position that the Commission is free to dismiss DSHS bid for reconsideration and take up a discussion of the new information we have provided for purposes of deciding whether to revert to the original boundaries set by the surrounding streets or revert to the February decision.

Thank you for your time.

Sincerely,

Janet Way, Chair

Shoreline Preservation Society