Sept. 27, 2016

Clark County Historic Preservation Commission

REQUEST FOR REVIEW AND COMMENT ON PROPOSED REPAIRS AND IMPROVEMENTS AT THE PROVIDENCE ACADEMY, 400 E. EVERGREEN BOULEVARD (Vancouver Case Number PRJ-153747/LUP-56487)

Background
Mother Joseph came to Vancouver in 1856 from Montreal, Canada. She funded construction of the House of Providence and numerous other academies, hospitals, schools and orphanages in the Pacific Northwest by leading begging tours to mining camps throughout the region. Her statue is displayed in the National Statuary Hall in Washington D.C.

The House of Providence is a three story brick masonry structure whose symmetry reflects Georgian inspiration. In 1969, when it ceased to function as a school, the Sisters of Providence sold the building, its sister buildings, and the seven acres they sit on to the Hidden family, whose ancestor Lowell Hidden was persuaded by Mother Joseph to manufacture the bricks used to build the structure.

The site was listed on the National Register of Historic Places in 1978.

The request proposes:

- Replace roofing;
- Improve seismic performance of roof diaphragm;
- Replace internal gutters, skylight, cornices and eave trim;
- Replace south deck columns and railings;
- Repair south deck; and
- Improve column foundations
The project is located in Heritage Overlay District Number 1. Section 20.510.020 of the Vancouver Municipal Code provides the applicable standards that apply to the House of Providence/Providence Academy. These are as follows:

A. Heritage Overlay District Number One

1. Establishment. Heritage Overlay District Number One shall be bounded by 12th Street, West Reserve Street, the north curb line of East Evergreen Boulevard, and C Street; Figure 20.510-1. This is primarily the site of Providence Academy, the dominant landmark and most important historic building in downtown Vancouver. The main Academy building is the major historic asset in the area, but the outbuildings and the grounds of the Academy are also important historical and architectural features because of their relationship to the main building, and their influence on views of the main building and on the character of the immediate environs.

2. Policy. Due to the importance of the site of Providence Academy, the Academy buildings, and the Academy grounds to the cultural, economic, and architectural history of Vancouver, and due to the unique character established by the buildings and grounds in combination with each other and with their surroundings, it is the policy of the city to preserve Providence Academy and critical open spaces integral to its site, and to ensure the compatibility of new construction or alterations to existing buildings, with the character of the historical buildings on the site. In order to accomplish this policy, special regulations are deemed necessary as an exercise of the city's legislative and police powers for the preservation and enhancement of the area.

3. Standards and requirements. The following requirements shall apply within Heritage Overlay District Number One, in addition to any other Zoning Ordinance regulations applicable to the area. The regulations are necessary to preserve the unique open space which provides a setting for and which is an integral part of the Providence Academy site, and to preserve views of the Academy from the East Evergreen Boulevard entrance to the downtown area.

   a. Construction shall not be allowed in the identified (0 feet) height limit area shown and described in the diagram below. New construction in the identified (75 feet) area and the (75 feet - 200 feet) area shall comply with VMC20.630.050 and the standards and guidelines of this section VMC20.510.020.
Staff Response:
No new structures are proposed.

b. A view corridor of 50 feet in width and a zero-foot height limit from approximately 11th Street looking east to the Main Academy building shall be preserved. In addition, there shall be one or two view corridors with a zero-foot height limit looking south from 12th Street into the Academy site which shall be a cumulative total of 50 feet in width.

Staff Response:
No new structures are proposed.

c. All new construction shall be similar in materials and texture to that of the main Academy building, and shall be primarily composed of brick facing, similar in color to that of the main building.

Staff Response
No new construction is proposed.

d. No sign shall be installed on the main Academy building above the first story. Free-standing signs on the property shall be limited to directional signs and necessary for parking and traffic control, and a limited number of signs advertising businesses on the premises containing an aggregate signage area of not more than 100 square feet. No sign or sign structure shall be more than 10 feet in height above the ground level.
Staff Response
No new signs are proposed with this application.

c. New construction shall minimize the removal of existing, mature trees exceeding 30 feet in height, and such construction shall be so located and designed as to preserve views of the main Academy building from East Evergreen Boulevard between the freeway and C Street, and shall preserve a setback from East Evergreen Boulevard of not less than 15 feet for open space and substantial planting, and such setback area shall not be used for parking.

Staff Response
No new structures are proposed.

20.510.030 Review Process

Under the provisions of 20.510.030(B) relating to exterior alterations, the code states:

All exterior alterations to a historic building or a structure located within a Heritage Overlay District, visible from a public street or other public place, and all exterior alterations to a building listed on the State or National Registers of Historic Places, including changes to signs, marquees, awnings, canopies or other building appendages, whether a building permit is required or not, as well as wall murals shall require advisory review by the Clark County Historic Preservation Commission. The standards for such review shall be those standards pertaining to architectural style, design, arrangement, texture, materials, color, and other pertinent factors designated in this section as standards for review of new construction and alterations to buildings within the specific Heritage Overlay District within which such property is located. The Clark County Historic Preservation Commission shall apply the standards for historic preservation projects which appear as Title 36, C.F.R., Part 67 of the Federal Register and shall consult with the planning official on any exterior alterations to a historic building within Heritage Overlay District.

Staff Response
In compliance with 20.510.030.B, staff is requesting an advisory review by the Clark County Historic Preservation Commission relating to Title 36, C.F.R., Part 67 of the Federal Register.

Staff has prepared responses to the applicable standards below.

Title 36, C.F.R., Part 67.7 Standards for rehabilitation are as follows:

(a) The following Standards for Rehabilitation are the criteria used to determine if a rehabilitation project qualifies as a certified rehabilitation. The intent of the Standards is to assist the long-term preservation of a property's significance through the preservation of historic materials and features. The Standards pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and the interior of historic buildings. The Standards also encompass related landscape features and the building's site and environment, as well as attached, adjacent, or related new construction. To be certified, a rehabilitation project must be determined by the Secretary to be consistent with the historic character of the structure(s) and, where applicable, the district in which it is located.
Staff Response
This section provides background for the standards. It does not contain specific standards.

(b) The following Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility. (The application of these Standards to rehabilitation projects is to be the same as under the previous version so that a project previously acceptable would continue to be acceptable under these Standards.)

(1) A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

Staff Response
This proposal does not change the existing building use.

(2) The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

Staff Response
The applicant has attempted to retain and preserve the building’s historic character. Some historic materials will be replaced as indicated above.

(3) Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

Staff Response
The applicant does not propose changes to create a false sense of historical development. In the instance of the revisions on the south deck columns and railings, the proposed increase in the railing height above the existing railing is a completely different design and material. This provides delineation between the historical railing element and the new, higher, railing.

(4) Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

Staff Response
The proposal does not remove historically significant materials.

(5) Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

Staff Response
Features and finishes are to be retained.

(6) Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
Staff Response
The proposal indicates the roof, internal gutters, skylights, cornices, eave trim, the south deck columns and railings will be replaced. The proposed replacement features generally matches design, color, texture, and other visual qualities the materials being replaced.

The roofing material, standing seam metal roof, may not match the historic appearance of the original roof. The applicant will document this change and the other changes to the structure.

(7) Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

Staff Response
The applicant has not proposed chemical or physical treatments to clean the building’s surfaces.

(8) Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Staff Response
The Vancouver Land Use and Zoning Code Section 20.710.090 is the Discovery Principal. This section states:

Uncovering archaeological items - In the event that any item of archaeological interest is uncovered during the course of a permitted or approved ground-disturbing action or activity:

Cessation of activity - All ground-disturbing activity shall immediately cease.

Notification - The applicant shall immediately notify the Planning Official and DAHP.

(9) New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

Staff Response
No new additions are proposed.

(10) New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.
Staff Response
No new additions are proposed.

(c) The quality of materials and craftsmanship used in a rehabilitation project must be commensurate with the quality of materials and craftsmanship of the historic building in question. Certain treatments, if improperly applied, or certain materials by their physical properties, may cause or accelerate physical deterioration of historic buildings. Inappropriate physical treatments include, but are not limited to: improper repointing techniques; improper exterior masonry cleaning methods; or improper introduction of insulation where damage to historic fabric would result. In almost all situations, use of these materials and treatments will result in denial of certification. Similarly, exterior additions that duplicate the form, material, and detailing of the structure to the extent that they compromise the historic character of the structure will result in denial of certification. For further information on appropriate and inappropriate rehabilitation treatments, owners are to consult the Guidelines for Rehabilitating Historic Buildings published by the NPS. “Preservation Briefs” and additional technical information to help property owners formulate plans for the rehabilitation, preservation, and continued use of historic properties consistent with the intent of the Secretary’s Standards for Rehabilitation are available from the SHPOs and NPS WASO. Owners are responsible for procuring this material as part of property planning for a certified rehabilitation.

Staff Response
The applicant is advised to consult the Guidelines for Rehabilitating Historic Buildings published by the NPS.

(d) In certain limited cases, it may be necessary to dismantle and rebuild portions of a certified historic structure to stabilize and repair weakened structural members and systems. In such cases, the Secretary will consider such extreme intervention as part of a certified rehabilitation if:

(1) The necessity for dismantling is justified in supporting documentation;

Staff Response
The proposal includes improvements to the column foundations.

(2) Significant architectural features and overall design are retained; and

Staff Response
The proposal includes constructing new concrete columns for the porch. This would include placing a new concrete column base, encasing the existing foundation and applying a veneer of salvaged bricks. This would retain the historical appearance.

(3) Adequate historic materials are retained to maintain the architectural and historic integrity of the overall structure.
Staff Response
The majority of the historic materials associated with the House of Providence are being maintained. Section 47 of the Internal Revenue Code of 1986 exempts certified historic structures from meeting the physical test for retention of external walls and internal structural framework specified therein for other rehabilitated buildings. Nevertheless, owners are cautioned that the Standards for Rehabilitation require retention of distinguishing historic materials of external and internal walls as well as structural systems. In limited instances, rehabilitations involving removal of existing external walls, i.e., external walls that detract from the historic character of the structure such as in the case of a nonsignificant later addition or walls that have lost their structural integrity due to deterioration may be certified as meeting the Standards for Rehabilitation.

Staff Response
The proposed upgrades to the foundation columns appear to be in conformance with this section.

(e) Prior approval of a project by Federal, State, and local agencies and organizations does not ensure certification by the Secretary for Federal tax purposes. The Secretary's Standards for Rehabilitation take precedence over other regulations and codes in determining whether the rehabilitation project is consistent with the historic character of the property and, where applicable, the district in which it is located.

Staff Response
No response required.

(f) The qualities of a property and its environment which qualify it as a certified historic structure are determined taking into account all available information, including information derived from the physical and architectural attributes of the building; such determinations are not limited to information contained in National Register or related documentation.

Staff Response
None required.

[Signature]

Jon Wagner, AICP, Senior Planner
Land Use Team
Community & Economic Development Department

Exhibits
1. Application Form
2. Applicant's presentation materials
3. Architectural drawings