

**From:** Eugenia Woo  
**To:** [PRC](#)  
**Cc:** [Hurley, Joseph](#); [Sodt, Sarah](#); [Kji Kelly](#); [Jeff Murdock](#)  
**Subject:** Historic Seattle Comments on #3033991-LU (2224 Second Avenue)  
**Date:** Wednesday, June 17, 2020 3:26:22 PM  
**Attachments:** [Outlook-ll14prua.png](#)

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**CAUTION: External Email**

Dear SDCI:

On behalf of Historic Seattle, I am submitting these comments in response to SDCI's Notice of Revised Application for record number 3033991-LU (a proposed project that has dire environmental impacts on the Wayne Apartments building, 2224 Second Avenue). The comment period was extended to June 17, 2020.

The proposed demolition of the Wayne Apartments and construction of the replacement project should be considered an adverse impact on the historic building, which was designated a Seattle Landmark by the Landmarks Preservation Board (LPB) in 2015. As the only extant building constructed before the regrade of Denny hill, the historic significance of the Wayne is clear. However, due to decades of deferred maintenance and skyrocketing land values, the owner convinced the LPB to not place controls on the landmark in 2018, making a case that designation would prevent the owner from "reasonable economic use" of the property. This meant no protections were placed on the designated features of the Wayne Apartments, leaving it vulnerable to redevelopment. However, placing no controls did not strip the Wayne of its landmark designation. Today, the Wayne Apartments building still stands. This block of Second Avenue has been an anchor in the Belltown community for decades.

Historic Seattle requests that alternatives to demolition of the designated landmark be considered.

If demolition is allowed, then the developer should be required to mitigate the loss of the landmark. Mitigation can be something that benefits preservation in Belltown—the developer could pay for a historic survey and inventory and preservation plan for the neighborhood; or contribute to a fund to go towards preservation of other landmarked buildings in Belltown. Consulting on mitigation with the Friends of Historic Belltown is recommended.

Before demolition and building permits are issued, the City must direct the developer/owner to follow [SMC 25.12.835.B](#), which specifies requirements for demolishing a landmark that include obtaining a certificate of approval (from the LPB) for demolition, recording and documenting the landmark to the Standards of the Historic American Buildings Survey (HABS), prohibiting demolition to occur until a Master Use Permit for the replacement project is ready for issuance, and requiring the owner to demonstrate financing prior to demolition.

The City must legally follow this regulation.

Thus far, the City has allowed two designated landmarks (the Galbraith House and the Sullivan House) to be demolished without requiring the owner to comply with SMC 25.12.835.B. The Wayne

Apartments deserve better. Belltown deserves better.

Thank you for the opportunity to comment.

**Eugenia Woo**

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