

St Mary's Catholic School

CITY OF FLAGSTAFF HERITAGE PRESERVATION COMMISSION STAFF REPORT

Phase -1 Cultural Resource Study Review

PZ-19-00031-01

Address: 320 N Humphreys St

DATE: December 7th, 2020

MEETING DATE: December 16th, 2020

REPORT BY: Mark Reavis, AICP, NCARB

BACKGROUND

As included in the HPC application the following description of the proposed project was provided. The applicant proposes to demolish the school structure commonly known as the St Mary's Catholic School. The adjacent David Babbitt Home is also proposed for demolition to make way for the construction of the proposed housing project stated as follows:

The project known as San Francisco Square sits on approximately 2.064 acres of land in downtown Flagstaff, Arizona. The site is currently improved with an existing 25,000 square foot elementary school as well as a 1,500 square foot 3-story residential home. The site is not currently in use, but was formerly occupied by the San Francisco de Asis Catholic School and Catholic Renewal Center. The school closed in December 2016. The school structure will be demolished and developed separately as senior and workforce housing in two phases over two years. Phase I, the senior project will consist of a 70-unit apartment with structured or podium parking and will be well positioned near a number of amenities and services appropriate for seniors. San Francisco Square will serve seniors age 62 years and older at 40%, 50% and 60% of Area Median Income. The project will include 60 one-bedroom and 10 2-bedroom apartments. The one-bedroom units are approximately 700 square feet and the two-bedroom units are 900 square feet. Green features include low water plumbing fixtures, Energy Star appliances, lighting, fixtures, and mechanical equipment, low emissions wood solids and finishing materials and recycled materials in roofing and insulation. The multi-story building will include a lobby, administrative offices and community room with kitchen. It will focus on sustainability and will incorporate high R-value wall and roof systems that will save energy while providing a comfortable environment for the occupant's appliances, light fixtures and windows will be Energy Star® rated. Water efficiency will be accomplished with the use of low flow fixtures. Phase II Workspace Housing to be developed in 2021.

PREVIOUS HP DECISIONS

This property has not been previously evaluated beyond exclusion from the North End Historic District or had related Heritage Preservation determinations regarding its disposition.

REQUEST

This is a request to review the Phase-1 Cultural Resource Study. The study is for a school property commonly known as the St. Mary's School, 320 N Humphreys Street, Flagstaff Arizona. The report was prepared by **SWCA Environmental Consulting**, Flagstaff, Arizona 86001. The report was prepared as part of a housing project to document the historic property with a Phase-1 Cultural Resource Study. SWCA

Architectural Historian Annie J. Lutes was principle author of the report. The property owner is: FSL Holdings, 1201E. Thomas Rd. Phoenix AZ 85014, Stephen L. Hastings Director of FSL RES 602.285.1800 shastings@fsl.org. The application and report indicate a request for total demolition of the School with no additional actions or mitigation.

STAFF RECOMMENDATION

The Phase 1 Cultural Resource Study meets submission requirements for Heritage Preservation Commission review. The Commission review will need to determine if the report is sufficient or if additional research and reporting is required or if mitigation is required to move forward with the development of the site and the demolition of the school. The Heritage Preservation Commission has the sole authority to approve the report with consideration of the Secretary of the Interior Standards for evaluating historic properties and local provisions.

Staff recommends that the Heritage Preservation Commission (HPC) review the Cultural Resource Study, and its photo documentation and become fully familiar with its content. The HPC is to listen to the consultant's presentation of the report and their conclusions. The HPC may ask the consultant any relevant questions regarding their determinations made in the report.

Staff recommends that the HPC provide additional inquires to clarify the report determinations of the evaluation of significance. The HPO recommends additional questions and considerations as follows:

- Is the report substantial in scope and meets the Secretary of the Interior Standards and local provisions for the loss of a resource of 50 plus years?
- Is the report enough and appropriate mitigation, either in the execution of the proposed project or as a separate mitigation product?
- Is the report in a form that returns the lost value of the resource to the public?

Staff recommends that additional mitigation be provided for the adverse impacts to the resource. Staff recommends that the Commission request modifications, additional information as conditions of approval for demolition of the school.

Recommended additional mitigation may include all or some of the following to be considered as appropriate mitigation.

- Provide additional investigative research into the relationship of David Babbitt as a Catholic and his and his families contributions to the Catholic Church and Catholic parochial schools.
- Provide additional written and photo documentation of the school that could include but is not limited to the architect of record and construction details.
- Prepare an architectural salvage plan for the preservation and utilization of features of the school.
 - Arrange for the professional salvage of exterior and interior features and materials with generated funds provided to various heritage preservation projects.
 - Promote the reuse and availability of quality building materials for reuse to limit landfill materials and promoting sustainability goals.

INTENT & PURPOSE

The intent of the preparation of Cultural Resource Study is to preserve aspects of a property in and alternative report form when demolition is the requested alternative. Cultural Resource Reports are intended to fully mitigate the loss of a property but also mandate a recommendation for appropriate mitigation. The Secretary of the Interior's Standards are incorporated into evaluation requirements for required research and documentation purposes.

The purpose of Heritage Preservation as noted in division **10-30.30.010** is to protect and enhance the cultural, historical, and archaeological heritage of the City of Flagstaff by recognizing, preserving, enhancing, and perpetuating the use of those objects, structures, sites, and landscape features that represent distinctive elements of the City's cultural, political, architectural, and archaeological history.

Cultural resources are an important consideration in an application for development. Professionally prepared cultural resource studies are therefore a requirement of an application for development. The type and format of studies required are determined based on the particular circumstances of the property on which development is proposed. Cultural resource studies assess the significance and integrity of potential resources, major impacts that would result from the proposed work and mitigation measures that could eliminate or offset any major impacts. This section provides detailed requirements for cultural resource studies and explains how such assessments are performed.

A. Cultural Resource Studies.

1. **Purpose.** To identify significant cultural resources and potential impacts of proposed development so that mitigation measures can be established for major impacts prior to development of the property.
2. **Applicability.**
 - a. Cultural resource studies are required for all public and private developments involving:
 - (5) Structures over 50 years old at the time of application.

Scope of Work

The primary considerations for this level of review.

10-30.30.050 3. **Specific Application Requirements.**

- a. **Types of Studies.** Upon consultation with the Historic Preservation Officer and based on the resources that are known or likely to be present, the applicant shall provide an archeological resource study and/or a historic resource study.
- b. **Preparation.** Cultural resource studies shall be prepared by professionals qualified in accordance with the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation ([36 CFR 61](#) Appendix A) as currently amended and annotated by the National Park Service.
- c. **Report Format.** The Historic Preservation Officer will work with the professional conducting the study to determine which one of the report formats is appropriate. *The resource present at the site did at a minimum require a Phase-2 Cultural Resource Study, that was required by the HPO. In consultation with the consultant a Historic American Building Survey (HABS) format was determined to be the best because of the requested demolition.*

(2) **Phase 1 Cultural Resource Studies.** When a letter report is not appropriate, a Phase 1 Cultural Resource Study shall be prepared. A Phase 1 Cultural Resource Study shall:

- (a) Identify the presence of cultural resources;
 - (b) Evaluate the potential for additional cultural resources being discovered;
 - (c) Assess the significance of identified and potential cultural resources;
 - (d) Assess the integrity of identified resources;
 - (e) Assess identified and potential impacts proposed;
 - (f) Provide measures to mitigate major impacts on cultural resources; and
 - (g) Advise whether Phase 2 or Phase 3 Cultural Resource Studies will be required.
-

DISCUSSION

COMMUNICATION BACKGROUND

The applicant contacted the HPO and included various individuals involved with the housing project. The communication by the HPO to the development team stressed Flagstaff's Heritage Preservation requirements and processes. The HPO has asked the applicant to confirm that the project does not require Section 106 review as a Federal Undertaking requiring both SHPO and Federal clearance under the National Historic Preservation Act, the applicant has indicated it is not a Federal Undertaking. The applicant's heritage consultant contacted the Heritage Preservation Officer (HPO) noting that they had been retained by the property owner. Within initial IDS plan review it was noted the entire block was to be developed and that the home would not be avoided, and demolition was proposed and confirmed by the submitted preliminary plans. The HPO made the determination that a Phase-1 report would be required and the results of that report after HPC review will determine further actions.

The Heritage Preservation Officer (HPO) was told by the developer that the project did not intend to preserve any structures on the site and intended to demolish the school building. As such the HPO along with consultation with the selected Cultural Resource Consultant determined that a Phase-1 Cultural Resource Study would be required. The report describes the significance of the property as follows:

The former St. Mary's Catholic School was first constructed in the mid-1950s as a classroom annex for the St. Anthony's Academy, and subsequently renovated and converted into a main school facility by the early 1960s. It is a midcentury, nonresidential example of the Contemporary style at the periphery of Flagstaff's commercial downtown and the historic North End residential neighborhood once occupied by the community's middle-upper-class white families. The former school was excluded from the North End Historic Residential District listing in 1986 because it was not yet 50 years of age and the terminal date for the period of significance for the district was 1935.

The school is a two-story, concrete building located along the periphery of Flagstaff's commercial downtown and the historic North End residential neighborhood. Since its construction in the mid- to late 1950s, the former Catholic school has had relatively few alterations to its current footprint and little modification to its midcentury design.

As the former Catholic school is over 50 years of age, the work requires a Historic Resource Study (HRS) to be conducted prior to project implementation. FSL Real Estate Services, LLC, the real estate affiliate of FSL, retained SWCA Environmental Consultants (SWCA) to conduct a Phase 1 HRS, the results of which are presented herein.

While acknowledging the importance of an affordable housing project and its desirable aspects the proposed project still must consider heritage preservation requirements. The provided report is acceptable in scope and documentation and is professionally prepared by the Cultural Resource Firm of SWCA Environmental Consultants. The report does not propose any additional mitigation beyond that of the report itself. Flagstaff's Heritage Preservation Officer (HPO) commends the consulting firm and its preparers in providing a professional report. The HPO does agree with the report conclusion that the demolition of the school will not impact to the North End District and with the report's overall conclusions of significance. The Phase-1 study does require a recommendation if additional mitigation is required.

HISTORIC ERA INTEGRITY

The Heritage Preservation Officer Mark Reavis, AICP, NCARB has reviewed the property and the submitted Phase-1 report and has determined that the property does not retain historic significance and concurs with the report's conclusion of significance under Criterion of the Federal Standards and Flagstaff Criterion, but this does not exclude review of the Study as complete and fully researched for properties of 50 plus years of age that have contributed to the rich history of Flagstaff architectural legacy.

ARCHITECTURAL DISCRIPTION:

The Phase-1 report and the photos look at the architectural description of the school along with the architectural changes that have taken place.

Basis of Report:

The information in this summary report was derived from the application to the Heritage Preservation Commission for the preparation of a Cultural Resource Report, the Flagstaff Zoning Code, The US Secretary of the Interior Standards for the Treatment and evaluation of Historic Resources and other Historic Preservation Resources and evaluation experience.

Evaluation of Effects & Mitigation

The evaluation of effect can be reviewed after full consideration of findings by the consultant. Regarding the demolition proposal and resource report the project can be considered for acceptance, though the HPO is recommending additional mitigation. Recent discussions regarding the disposition of the school as well as the David Babbitt Home established the most current history and efforts in evaluation and preservation of the property. Discussions with the project developer and city staff reviewed plans for the proposed senior citizen's affordable housing project. Providing affordable senior housing in the proximity of the Central Business District was also discussed. Conversations pointed toward demolition as the preferred alternative by the developer.

Considering the age of the school, its architectural aspects a Phase-1 Cultural Resource Study was appropriate; a determination made by the Heritage Preservation Officer. Flagstaff's Heritage Preservation ordinance 10-30.30 provisions regarding Phase-1 reports cover requirements intended to protect cultural resource values. The Heritage Preservation Officer (HPO) in a dialogue with the Cultural

Resource (CR) consulting firm (that was chosen by the developer) considered the developer preferred option of the demolition. The Heritage Preservation Officer and the CR consultant felt that the Phase-1 report should be focused to uncover unique aspects of the property. Flagstaff's Heritage Preservation program still requires appropriate mitigation for the loss of a cultural resource. It will be the Heritage Preservation Commissions responsibility to determine if the report is sufficient in its scope as mitigation

Recommended Mitigation

The Heritage Preservation Officer feels that the St Mary's School is representative of the City of Flagstaff's mid-century architecture and as such deserves additional mitigation beyond the required documentation. It is up to the applicant to meet the requirements and specifics of appropriate mitigation. Mitigation can take on various forms of compliance.

OPTIONS FOR COMMISSION DECISION-MAKING:

- 1) The Commission could accept the conclusions of the Phase-1 Cultural Resource Study and require no further actions or requirements.
- 2) The Commission could hold off on determinations until next regularly scheduled meeting reviewing the report and information presented at the Commission meeting.
- 3) The Commission could request modifications, additional information and a comprehensive mitigation plan. that includes additional research and salvage that is in addition to the Phase-1 report and include this as conditions of approval for demolition of the St Mary's School. (Staff Recommendation)