HISTORIC SEATTLE
EDUCATE ADVOCATE PRESERVE

OUR PROPERTIES

Good Shepherd Center
Built: 1906 | Operated by Historic Seattle since 1975

Mutual Life Building
Built: 1890-1916 | Operated by Historic Seattle since 1983

Phillips House
Built: 1902 | Operated by Historic Seattle since 1992

Dearborn House
Historic Seattle Headquarters
Built: 1907 | Operated by Historic Seattle since 1997

Cadillac Hotel
Built: 1898 | Operated by Historic Seattle since 2001

Washington Hall
Built: 1908 | Operated by Historic Seattle since 2009

Garden House
Built: 1886 | Operated by Historic Seattle since 2021

Good Arts Building
Built: 1889 | Operated by Historic Seattle since 2022

Auburn Carnegie Library
Built: 1914 | Operated by Historic Seattle since 2025

1117 Minor Avenue
Seattle, WA 98101

(206) 622-6952
info@historicseattle.org

October 20, 2026

Via email to sarah.sodt@seattle.gov

Seattle Landmarks Preservation Board
c/o Sarah Sodt, City Historic Preservation Officer

Re: J.S. Graham Store / Doyle Building (119 Pine St.)

Dear Members of the Seattle Landmarks Preservation Board:

On behalf of Historic Seattle, I am writing to comment on the proposal to drastically and **irreversibly** alter the landmark J.S. Graham Store / Doyle building, located at 119 Pine Street in downtown Seattle. Historic Seattle previously commented on this proposal over one year ago at your August 6, 2025 Board meeting. Our thoughts about the proposed project have not changed. This proposal is even worse than the previous one.

The proposal is facadism. It is NOT an addition to a landmark. It is NOT adaptive reuse. If approved, this would be a demolition of most of the landmark.

The Doyle building is not only a designated Seattle Landmark but also listed in the National Register of Historic Places and Washington Heritage Register. Built in 1919-1920, the building was designated as a Seattle landmark by your predecessors on the Landmarks Preservation Board in 1987 under two of the six designation standards: **It embodies the distinctive visual characteristics of an architectural style, or period, or of a method of construction; and it is an outstanding work of a designer or builder.**

In 1988, Seattle City Council passed a designating ordinance (113987) imposing controls and providing potential incentives for the landmark. **Current owner Fana Group purchased the property in 2012 knowing full well that they were buying a designated landmark with controls and a designating ordinance.**

More Than Just Two Facades

We stress that the controls on the four-story Doyle building are on the exterior of the east, north, and west facades AND on the roof. The project proponent keeps emphasizing only the east and north facades; they want the Board to ignore the fact that three elevations and the roof are designated with controls and that the Secretary of the Interior's Standards apply to ALL the designated features, not just the two facades.

The Proposed Project is NOT an Addition

The project would demolish everything except for the east and north facades and the **original** upper story windows of these facades would be replaced. With all the building's structural elements and the roof demolished, nothing would remain on which to add because an entirely new structural system (a four-story reinforced concrete structure and fifth-story concrete gasket level) would need to be constructed to support an 18-story mass timber "addition" resulting in a newly erected 23-story tower (270' in height) with two historic facades pasted onto new construction. We note the proposed project is not fully a mass timber building because it sits on top of five levels of a new concrete structure.

The Proposed Project is NOT Adaptive Reuse

Historic Seattle supports adaptive reuse. A few of our own historic properties are excellent examples of adaptive reuse including the Good Shepherd Center, the Cadillac Hotel, and Washington Hall. This proposed project is NOT an adaptive reuse of the Doyle building because there would be nothing left of the historic building to adaptively reuse from commercial to residential. It's all brand-new construction other than the two remaining facades.

Regulations Section of Briefing Packet #2 Needs Clarity

Section 3.1 (Regulations) of the proponent's briefing packet #2 (page 20) describes some laws, regulations, and incentives that may apply to the project. We would like to provide more clarity about what has been presented to you and pose some questions.

Office to residential conversion program: Historic Seattle supports the conversion of commercial buildings to residential use. But we wonder if most of the landmark Doyle building is demolished except for two exterior walls, then is there an existing building left to convert? It is new construction. Additionally, 40% of what was the Doyle building is proposed to be a parking garage which is not residential use. *Can the owner benefit from SMC 5.75?*

Second Substitute House Bill 1183, effective July 27, 2025, "Building Codes and Development Regulations – Various Provisions." The project proponent states, "House Bill 1183…modified Washington's land use regulations…Now…cities and counties may not require façade modulation or upper-level setbacks as a condition of permitting for mass timber construction or conversion of existing buildings to housing."

In reviewing Second Substitute HB 1183, we found Sec. 4. (2)(e) which reads: "Through ordinances, development regulations, zoning regulations, or other official controls as required under subsection (1) of this section, code cities may not: (e) Impose exterior design or architectural requirements on the residential use of an existing building beyond those necessary for health and safety of the use of the interior of the building or to preserve character-defining streetscapes, **unless the building is a designated landmark or is within a historic district established through a local preservation ordinance**." (emphasis added)

Our interpretation: This clearly exempts designated landmarks and buildings in historic districts. The Landmarks Preservation Board has control over how this landmarked building is altered, even if the new tower is a mostly mass timber structure.

City of Seattle Ordinance 127445: This ordinance is cited heavily by the project proponent. On pages 2 and 3 of the ordinance, a list of Recitals for the legislation is provided. Yes, it says, "The proposed legislation removes code barriers to mass timber, passive house, and modular construction methods." Again, we ask is the proposed project a mass timber building if it is built on top of a five-story concrete structure? SMC 23.40.090.A.2. says, "'Mass timber construction' means a building with structural components primarily made of mass timber products as defined in RCW 19.27.570."

Just below the recital on removing barriers to mass timber, etc. is another recital (an important one) that says, **"The proposed legislation is focused on opportunity areas for infill development and is tailored to avoid development pressure on historic landmarks, sites with character structures and displacement risk areas."** This recital clearly states City Council's intent is to not impact landmarks. The Doyle building is an extant landmark and is not considered a candidate for infill development—why destroy a landmark to create an infill site? The proposed project places undue development pressure on the landmark by creating a problem where it does not exist to "save" the Doyle (or two facades).

Tower spacing and separation applies: Pages 32-39 of the same ordinance (127445) amends SMC 23.49.058 Downtown Office Core 1, Downtown Office Core 2, and Downtown Mixed Commercial upper-level development standards. **SMC 23.49.058.D.1. and D.2. Tower spacing in DMC zones.** D.2. says, "Except as otherwise provided in this subsection 23.49.058.D., in the DMC 240/290-440 zone located between Stewart Street, Union Street, Third

Avenue, and First Avenue, if any part of a tower exceeds 160 feet in height, then all portions of the tower that are above 125 feet in height shall be separated from any other existing tower that is above 160 feet in height, and the minimum separation required between towers from all points above 125 feet in each tower is 60 feet."

The Doyle building parcel is zoned DMC 240/290-440. The Doyle building is in the DMC 240/290-440 zone at 119 Pine Street (Second and Pine) which is within the boundaries described above. The proposed project is 270' in height (well above 160'). 1521 Second Avenue tower adjacent to the south is 38 stories (440' in height). *We believe the proposed project on the Doyle building parcel would need to meet tower spacing requirements of the DMC zone.*

The Board may want clarity on and seek code interpretation for Ordinance 127445, SMC 23.40.090, and 23.49.058.D. because they are contradictory. And seek clarity of how "primarily made of mass timber products" is defined.

Special Tax Valuation and other incentives: We are highly doubtful that this project (as proposed) would qualify for special tax valuation (an incentive for designated Seattle landmarks) because the project does not meet the Standards (a requirement to obtain the incentive). Since the Doyle building is listed individually in the National Register of Historic Places, a project that meets the Standards would qualify for federal historic tax credits. This incentive is not mentioned in briefing packet #2. The project (as proposed) does not meet the Standards and therefore, would probably not be successful in obtaining federal historic tax credits. Because the landmark is located downtown, there is an opportunity to seek transfer of development rights as well, but we did not see TDRs mentioned.

The Proposed Project Does Not Meet the Secretary of the Interior's Standards for Rehabilitation

The source of the Secretary of the Interior's Standards for Rehabilitation is the National Park Service. Historic Seattle refers to the ten Standards on the NPS website.
https://www.nps.gov/articles/000/treatment-standards-rehabilitation.htm

Following is the list of the ten Standards (verbatim from NPS) and our review of the proposed project and how it does or does not meet the Standards. We note that the Standards as written in briefing packet #2 (pages 40-44) are not verbatim from NPS.

Standard 1: A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.

As proposed, 40% of the protected Doyle building (with 40% of the windows on the north facade) is being converted to a parking garage. This violates Standard 1 and reduces "eyes on the street," Jane Jacobs' primary requirement for a healthy city. The scale of the proposed new building dwarfs the Doyle's four-story facades and other historic buildings on Pine Street, a primary route to the Pike Place Market.

Standard 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.

The proposed project destroys most of the landmark leaving only two facades. Controlled features include east, north, west facades and roof. Original wood windows are proposed for replacement, but the window survey does not make a convincing case for full replacement. An out-of-scale, 23-story, new construction building behind two facades adversely affects the historic character and integrity of the landmark.

Standard 3: Each property will 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 elements from other historic properties, will not be undertaken.

Repairing and restoring the north and east facades; replacing existing non-historic storefront systems; and not adding conjectural features or elements to create a false sense of historical development is an approach that meets this standard.

Standard 4: Changes to a property that have acquired historic significance in their own right will be retained and preserved. Not applicable to this project.

Standard 5: Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

The proposal does not yet have enough details about the treatment of the north and east facades. As a start, the Facade Survey cites appropriate treatment of the historic fabric and features. There is not enough information about how the north and east facades will be shored up and protected while the rest of landmark is being demolished and the new tower is constructed.

Standard 6: Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

The proposal does not address replacing the original upper-story windows here. It mentions the windows under Standard 2. As proposed, the removal of all original upper-story windows would not meet this standard. The Window Survey does not adequately make the case that the deterioration is so severe as to require replacement.

Standard 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

The proposal does not contain enough detail about the treatment. It just repeats the language in this standard.

Standard 8: Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken. Not applicable to this project.

Standard 9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

During last year's briefing, the Board commented that the "addition" (at 12 stories) was too heavy and dwarfed the landmark. This new building is even larger and more out-of-scale, and the gasket does nothing to mitigate this fact. The landmark is a human-scale, right-size, mixed-use building that stands today due to its original high quality of design, construction, materials, condition, and integrity.

The proposal ignores the fact that a 23-story tower rising behind two historic facades would have an adverse impact on the landmark. **The addition is out-of-scale and incompatible with the landmark building.** It treats the landmark building as a four-story base for the new tower, completely upending the original and historic proportions of the landmark. The historic building's expression of form, proportion, and scale become secondary to the new construction. It's one thing to differentiate the new from the old, but the new in this case overwhelms the landmark, no matter how much the character-defining projecting cornice delineates the old from the new. And the fifth story gasket will not magically solve the problems with this major alteration to the Doyle building.

The National Park Service provides guidance on appropriate additions utilizing the Secretary of the Interior's Standards (adopted as its rules by the Seattle LPB) in Preservation Brief 14. It states, "A new addition should always be subordinate to the historic building; it should not compete in size, scale or design with the historic building,"

and “a rooftop addition should almost always be set back at least one full bay from the primary elevation, as well as from other elevations if the building is highly visible.” **The project does NOT meet the Standards.**

Standard 10: New additions and adjacent or related new construction will 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.

The project proponent’s response does not address the standard at all. It does not pass the straight face test. This standard is about reversibility. There is no way that the new four-story concrete structure, one-story concrete gasket, and 18-story mass timber building would ever be removed in the future. And if the new building were to be removed, only two facades would remain (but it is highly doubtful the historic facades would stay intact if the new construction were demolished).

We also point out that the Doyle building does not need to be stabilized if building structure were left intact. The proponent is creating a situation to “stabilize” the landmark because the proposal demolishes most of the landmark for an incompatible new tower.

Other Issues

This neighborhood does not suffer from downtown’s “Economic Stresses” as described in the introduction. It is the halfway point between the Pike Place Market and the Westlake light rail station under the landmarked Bon Marche building. Thousands of Seattle tourists and residents pass by the Doyle every day. The H-Mart across the street is the primary grocery for many neighborhood residents.

The examples cited as “precedents” should not be considered as best preservation practices by the Board. It is up to the LPB to decide whether and how large an addition would be appropriate for EACH individual landmark. Some of these C of A’s (such as the Terminal Sales Annex) have expired and are no longer relevant to this discussion.

Regarding adaptive reuse of the Doyle building (see Sections 2.5 and 5.1 of briefing packet #2, pages 18, 19, and 39, respectively), what does economically infeasible mean? Especially compared to what is being proposed which will be a highly costly project and its viability is skeptical. The more traditional approaches to rehabilitation that would meet the Standards are projects that are undertaken on a regular basis in Seattle, Washington state, and throughout the country. If these projects were truly economically infeasible, we would not see any similar projects. The project proponent needs to show the numbers.

Finally, the project as proposed does not need to happen. Why not construct this speculative building on any other, non-landmarked property in the city? There are vacant lots (some are the sites of demolished landmarks) in Belltown and elsewhere. There is no need to destroy the Doyle building, a historic gem in Seattle.

Thank you for the opportunity to comment and for reading this long letter! We respectfully request that the Board ask the hard questions at your meeting. Please do not support facadism of this outstanding Seattle landmark.

Please Save the Doyle Building—from this proposal. Thank you.

Sincerely,

Eugenia Woo

Eugenia Woo
Director of Preservation Services