



November 25, 2020

Mr. George Gause
Heritage Preservation Supervisor
City of St. Paul
Heritage Preservation Commission
25 W 4th St., Suite #1400
St. Paul, MN 55102

Re: University of St. Thomas – Demolition of Loras Hall
Inventory Number: RA-SPC-3790

Dear Mr. Gause:

The University of St. Thomas (the “University” or “St. Thomas”) submits this letter in response to the Heritage Preservation Commission (“HPC”) Staff Report prepared in connection with the University’s application for a demolition permit for Loras Hall (the “Staff Report”). While the Staff Report recommends denying the application, the demolition of Loras Hall satisfies the standards for demolition outlined in *Legislative Code 73.06(i)(2)*. Therefore, we urge the members of the HPC to approve the demolition and allow the University to move forward with the proposed Science, Technology, Engineering, Arts, and Math (STEAM) building. By permitting the University to replace Loras Hall with a STEAM building that will blend into the Summit Avenue West Heritage Preservation District, the HPC will be furthering the expansion of a world class academic community in the City of St. Paul.

I. Loras Hall does not have significant architectural and historical merit

The Staff Report concludes that Loras Hall has significant architectural and historic merit because it “was designed by Cass Gilbert, who is a noted architect” and because a 2017 historic assessment “speculates that Loras Hall is eligible to the National Register individually.” (Staff Report p.3). The Staff Report’s analysis of this requirement fails to consider all of the elements needed to show significance from an architectural and historical perspective.

A. Not all buildings designed by prominent architects are significant.

When considering a building for significance as the work of a master architect, the National Park Service offers this guidance: “A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect. For example, not every building designed by Frank Lloyd Wright is eligible under this portion of Criterion C.” This caveat certainly applies to Loras Hall. Being designed by Cass Gilbert does not, in and of itself determine the historical significance of the building. Instead, it is important to take a closer look at the context within which the building was designed and, as shown below, in this case, Loras Hall lacks historic and architectural merit.

B. The 2017 Assessment does not conclude that Loras Hall is individually significant from an architectural or historical perspective.

The National Register of Historic Places nomination for the West Summit Avenue Historic District (the “Nomination”) makes clear that, although Loras Hall was identified as contributing to the district, it was not among the character defining features of the historic district. According to the Nomination, the historic district represents, “the largest unbroken avenue of Colonial Revival and Classical Revival-style architect-designed *houses* in the Twin Cities [emphasis added].” The Nomination describes the historic characteristics of West Summit Avenue: “Overall, the feeling on the avenue is one of stateliness. This feeling is a result of the combination of large lots, large houses, compatible architectural styles, generous setbacks, the boulevard, and mature plantings. It is this combination which sets West

Summit Avenue apart from adjacent residential neighborhoods to the north and south and makes it a unique avenue in the Twin Cities." Although the Nomination extends the beginning of the period of significance to 1885, it states that, "What becomes clear is that west Summit Avenue obtains its character from the 200 properties built between 1900-1929."

The above quotations demonstrate that the significance of the West Summit Avenue Historic District is its collection of residential architecture from the early twentieth century. Indeed, regarding its inclusion of the St. Paul Seminary, University of St. Thomas, and Macalester College campuses within the historic district boundaries: "These boundaries on the college campuses are designed to preserve an unbroken streetscape within the district." In other words, the portions of these campuses fronting Summit Avenue were included for continuity purposes.

The Nomination does note that the three college campuses were "integral in the history of west Summit," and it provides the example of Macalester College spurring residential development along Summit Avenue and in surrounding neighborhoods. The Nomination notes that: "The presence of Macalester College played a key role in the residential development of the west end of Summit Avenue. Several neighborhoods were platted around Macalester College south of Summit Avenue in the 1880s." However, no similar statements are made about St. Paul Seminary regarding residential development along Summit Avenue. In fact, it was a full decade after development of the seminary campus when, in 1903, the St. Paul Park Board assumed control of the Summit Avenue boulevard and provided regular maintenance. Residential construction extended west toward the campus during the 1910s and 1920s.

The six original buildings of the St. Paul Seminary were built during 1893-1894 to the designs of Cass Gilbert and with a great deal of input from James J. Hill and Archbishop John Ireland. The campus was clearly designed in a quad layout, and buildings faced inward toward the center: the dormitories, refectory and gymnasium faced west, the classroom building north, and the administrative building east. The campus was not oriented toward Summit Avenue, which was little more than a dirt road at the time. Rather, Grand Avenue was the main entry onto campus. (Notably, the Chapel of St. Mary is oriented to Summit Avenue, having been built during 1902-1904 when the boulevard was being improved.) Loras Hall was not designed with regard to Summit Avenue, rather to the quad layout, and as such its primary façade does not face Summit Avenue.

There is no doubt that Cass Gilbert was a master architect, and the St. Paul Seminary commission was important in his career. The seminary campus was the first of several college and university campus commissions that Gilbert would be awarded, and it was his first large-scale commission. As a whole, the seminary campus is important as the first example of Gilbert's work in college campus design and as an example of quad-type campus layout, which would become standard during the twentieth century. However, due to the loss of three original buildings and to new construction, and as demonstrated in the 2016 Hess Roise report, the seminary campus lacks historic integrity and, therefore, can no longer convey this significance. Furthermore, because Loras Hall was designed and built as part of a campus, not intended to function alone, it does not individually convey associations with events, patterns, or persons significant in history.

As an individual building, Loras Hall is well designed and solid, but it lacks architectural distinction. It demonstrates some elements of the Renaissance Revival style including a low-pitched hipped roof, symmetrical façade, and arched main entrance. However, the building lacks other common elements of the style, such as classical details and an arcaded or rusticated ground level. The design has been called "stiff," due to the "heavy hand of Hill," (Millett 2007) and "utilitarian and lacking in ornamentation" (Blanck and Locks 2001). Other architectural historians writing about St. Paul architecture devote six pages to Gilbert's career but fail to mention Loras Hall or the St. Paul Seminary campus (Hess and Larson 2006). Hess and Larson describe Gilbert as "a phenomenal manipulator of colors and surfaces. In his hand, even the most pedestrian shapes and stultifying symmetries... could be transformed into wonderful essays in light and hue and texture." Loras Hall has none of these qualities, however. Its walls are smooth and single color, punctuated only by simple unadorned window openings. As noted above, the building seems to represent Hill's micromanagement as much as Gilbert's design work, and it does not illustrate the architect's considerable talents.

As this analysis demonstrates, Loras Hall lacks significant architectural and historical merit and as a result, the HPC should adopt findings that support the issuance of a demolition permit.

II. The demolition of Loras Hall will have no significant impact on surrounding buildings

The Staff Report notes that the “[d]emolition would result in the loss of another early Cass Gilbert structure on the campus” but fails to provide any evidence that such demolition will impact surrounding buildings. It is worth noting that the review at hand is the impact to the West Summit Avenue Historic District, not the former St. Paul Seminary campus, which is not a historic district. In fact, the Staff Report notes that there have been numerous changes to the University’s west campus over the years and the campus itself does not exist as an intact historic district. The west campus, which includes the original St. Paul Seminary campus and Loras Hall, is largely occupied by noncontributing new construction and parking lots.

Loras Hall itself is an island within a sea of parking lots and its demolition will have no significant impact on any surrounding buildings. Although Loras Hall is visible from the Chapel of St. Mary, the view is obstructed by trees, an addition on the west side of the chapel and distance (approximately 300 feet). Further, Loras Hall does not face Summit Avenue and is not a visible contribution to the architectural character of the West Summit Avenue District which is 2.8 miles in length and comprised of 390 contributing buildings. The removal of one building, which as noted above, is not one of the significant character defining features of the historic district, will not compromise the overall integrity of the district.

Based on the foregoing, the demolition of Loras Hall will have no significant impact on surrounding buildings and the West Summit Avenue Historic District and therefore, this criteria is not justification to deny the requested permit for demolition.

III. The usefulness of Loras Hall is vastly outweighed by the proposed STEAM building

The Staff Report acknowledges that the third factor to be considered in evaluating a request for demolition requires the HPC to look at “[t]he economic value or usefulness of the building...as it now exists in comparison with the value or usefulness of any proposed structures designated to replace the present building or buildings.” (Staff Report p.4)

Loras Hall as it exists now, even as modified or altered, cannot compete with the economic value or usefulness of the proposed STEAM structure that will replace the present building. The Staff Report suggests that an “independent, robust exploration of options is needed with independent reviewers from the community.” (Staff Report p. 4). The Code provisions which outline the standards for considering a demolition permit do not, in fact, require this. Even so, St. Thomas has engaged in a robust exploration of options and has presented this information in connection with its application materials. The construction of any new building on this site will be subject to additional applications and review by HPC. Today, HPC’s role is to evaluate the economic value and usefulness of the current structure as compared to a proposed replacement building.

To that end, it is important to note that Loras Hall currently provides little benefit to the University’s students or to the broader community. It is extremely inefficient and lacks sustainability. Built in 1894, Loras Hall is not insulated, has no efficient heating system, no air conditioning and limited airflow. The University estimates that the gas utility costs to support Loras are 40 to 60% higher than the equivalent amount of space in the proposed lead certified STEAM building. In addition, over 72 window air conditioners are installed in Loras Hall every summer to mitigate the excessive heat for occupants in that building. While the University does not have an accurate estimate on the electric energy use of these individual units versus a modern central air conditioning system, it is widely recognized that these types of window units are highly inefficient as it relates to energy usage.

While Loras Hall was originally used as a dormitory, it now houses a mix of small functions, including faculty offices, music practice rooms, a credit union, prayer rooms, and storage. Even with a significant financial investment – estimated

to be over \$10 million dollars - the building's construction and configuration limit the way in which it can be used.¹ Given those inherent limitations, the building has little to no economic value or usefulness.

In contrast, the proposed 120,000-gross-square-foot STEAM building will provide adaptable program spaces for collaborative, highly technical and equipment-intensive learning required for studying engineering, health sciences, technology, math and art. Construction of the proposed project will allow the University to optimize academic offerings while also providing community amenities. Investment in the STEAM complex will provide world-class space to accommodate intentional enrollment and diversity growth in engineering and health fields. The ability to grow these programs in a world-class physical complex will attract top students and faculty to St. Paul from around the country and globe who seek premier STEAM experiences and degrees. The complex will also provide community space open to STEM and music partnerships with St. Paul public and private K-12 schools. The complex and its surrounding green space will be an amenity to the neighborhood and the performance and gathering spaces will make it an asset to the greater St. Paul community.

The University strongly believes that the most appropriate and highest-value site for the STEAM building is along the south side of Summit Avenue between O'Shaughnessy Science Hall and the Saint Paul Seminary. An important factor in this conclusion is the efficiencies that will be accomplished by locating the new building adjacent to the existing science and engineering buildings.

Finally, from the perspective of honoring history, by allowing for the demolition of Loras Hall and the construction of the new STEAM building (the design of which will be reviewed by HPC) in its place, the University will actually contribute to the magnificence that Horace Cleveland imagined when he designed Summit Avenue. Currently, the only portion of Loras Hall that is remotely visible from Summit Avenue is the fire escape doors on the north end. By replacing Loras with a new, architecturally designed STEAM building, St. Thomas will add a Summit facing building to the campus and increase the stateliness of Summit Avenue that was promoted in the Nomination.

As noted above, and in our original application, while we urge you to evaluate the demolition of Loras Hall in connection with the University of St. Thomas' larger vision and commitment to its campus in the City St. Paul, the construction of any building on this site will provide HPC with additional opportunities to comment on, and approve, the permits that will be needed. The STEAM project will offer the community many new and exciting engagements, connections, and shared uses of the University's south campus.

IV. Additional Notes

In addition to addressing the specific criteria that should be considered by HPC in evaluating the application for a demolition permit for Loras Hall, we wanted to touch on two additional points.

A. Consideration of Other Options.

The Staff Report questions whether the proposed STEAM building that will replace Loras Hall could, instead, be located elsewhere on the University campus. Staff recommends that more time be spent reviewing options with "independent community members." The University has, in fact, considered several other options and has also spent significant time working with independent community members through this process.

As noted in our application materials, prior to moving forward with this application, the University invested a significant amount of time exploring other options for the location of the proposed STEAM facility. In addition to the limitations imposed by the CUP, the University recognizes that the location of the STEAM building relative to existing science and engineering facilities is important. The connectivity and close relationship to the existing science and engineering spaces

¹ The Staff Report questions whether this \$10 million dollar estimate is accurate. During the analysis of options for the STEAM building, the University received preliminary estimates that costs would be close to \$10 million. On November 24, 2020, the University received an updated summary of Loras related costs from McGough which reflects renovation costs of \$10,422,680.00. A copy of this estimate will be provided to HPC staff.

in O'Shaughnessy Hall and Owens Hall is important to both students and faculty as classrooms, labs, learning spaces and offices are physically close to each other to those students majoring in the STEAM fields. Placing the new STEAM building on any other part of campus more distant than the proposed location or trying to build around Loras Hall would be ineffective for the learning process.

Historically, spaces in STEAM type buildings were faculty offices, labs, classrooms and learning areas that were separated and in some cases isolated. The most impactful way to educate students has changed over time. Current effective educational practices require that STEAM spaces are all interrelated, adjacent to each other and promote free-flowing conversations and informal collisions in a way that encourages engagement, learning and education. Leaving Loras Hall in place, would require segregation and dislocation of these spaces and reduces the learning and education process. For all of these reasons, placement of the new STEAM building on the Loras Hall site is important.

In addition to internal planning and consideration of options, the University has engaged in extensive community discussions. To gather independent analysis of the proposal and consult with neighbors, we have participated in a significant number of conversations with neighborhood and community groups that discussed the goals of the STEAM complex, its benefits to the community and to explore and address any potential concerns about the demolition of Loras Hall. The Mac Groveland Community Council voted to support our proposal 14-1. The Union Park Housing and Land Use Committee voted to support our proposal 6-2- with two abstentions. The West Summit Neighborhood Advisory Committee (WSNAC) also discussed the proposal at length to provide a forum for immediate neighbors to discuss concerns. Supportive voices in these discussions included engineers and architects that live in the neighborhood. While the Summit Avenue Residential Preservation Association (SARPA) voted to oppose the demolition of Loras Hall, we have received support from several other Summit Avenue homeowners.

Since one consideration in evaluating the demolition permit is the potential replacement building, in the community discussions, the University has spent time talking with these groups about the future STEAM building, its location and proposed impact on the campus. By engaging in these community discussions, the University has, in fact, had independent voices participate in the process. As you are aware, prior to constructing any future STEAM building, the University will engage in additional discussions with HPC through the permitting process.

B. The University has a strong commitment to historic preservation

Finally, it is important for HPC to recognize that the University has a strong commitment to recognizing and honoring the rich history of the West Summit Avenue neighborhood, the City of St. Paul, and the University of St. Thomas.

The University does not take historic preservation lightly and has a proven track record of investing in preservation activities when it brings value to students. Emmanuel Masqueray is another noted architect with buildings on the St Thomas campus. Masqueray was the architect of the St. Paul Cathedral and the Minneapolis Basilica. The Chapel of Saint Thomas Aquinas and Ireland Hall are both Masqueray buildings on the St Thomas campus. Over the last two years, the university has spent approximately \$24 million on interior and exterior renovations and expansion of those buildings. All this work was done with an eye on preserving the historic nature of these two buildings and providing them an impactful and useful life for students going forward.

The Staff Report questions whether the University is seeking counsel from firms that have a background in working on historic structures or preservation. Throughout the process of considering the demolition of Loras Hall, as well as the possible STEAM building which will replace it, the University has sought to include technical expertise by engaging Streamline Associates to advise the University on issues related to historic preservation. Streamline was formed in 2016 by Andrew Schmidt, who has nearly 30 years of experience in historic resources consulting. Andrew regularly participates in all aspects of historic consultation, including identifying historic resources and completing mitigation measures. He has consulted with federal, state, and local agencies throughout the country. Andrew also has authored more than 25 successful National Register nominations and has prepared preservation tax credit applications. In addition, he has been the Principal Investigator for HPC sponsored neighborhood surveys.

Finally, HPC itself has recognized the work that St. Thomas has done in connection with historic preservation, giving St. Thomas an award in the category of "New Addition to a Historic Building" in 2010 following the University's expansion of Sitzmann Hall. As noted in our application materials, St. Thomas is committed to honoring the history of Loras Hall and legacy of Cass Gilbert through the demolition process as well as in connection with the construction of the new STEAM facility.

IV. Conclusion

As noted at the outset of this letter, and in the Staff Report, in reviewing an application for demolition, HPC is charged with considering whether (a) Loras Hall has significant architectural and/or historic merit; (b) the demolition of Loras Hall will have a negative impact on surrounding properties and (c) an analysis of "[t]he economic value or usefulness of the building...as it now exists in comparison with the value or usefulness of any proposed structures designated to replace the present building or buildings.

As outlined above, Loras Hall does not have significant architectural or historic merit and its demolition will not have a significant impact on surrounding properties. Finally, and importantly, an analysis of the economic value or usefulness of the existing building as compared to the value and usefulness of the proposed STEAM building that will be located on this site strongly supports the demolition of Loras Hall. The new addition will allow St. Thomas will provide exceptional and interdisciplinary Science, Technology, Engineering, Arts and Math (STEAM) programming. With consultation from employers, we will co-create relevant cross-disciplinary curricula that inspires creative problem solving among our students and enables collaboration across programs. The new STEAM Complex on south campus will provide world-class space to accommodate intentional enrollment and diversity growth in engineering, health and digital media fields, in close collaboration with arts and sciences programs. The exemplary offerings, along with the world-class physical complex, will attract top students and faculty from around the country and globe who seek premier STEAM experiences and degrees.

Because the HPC is required to make written findings supporting its decision, we have attached a draft resolution that contains findings of fact to support HPC's decision to support the demolition.

Regards,



Mark Vangsgard
Vice President for Business Affairs and Chief Financial Officer
University of St. Thomas

Attachment: Proposed Heritage Preservation Commission Resolution

- c: Amy McDonough, Chief of Staff, University of St. Thomas
- Tia Anderson, Principal City Planner, City of St. Paul
- Greg Fenton, BWBR
- Andrew Schmidt, Streamline Associates
- Brian Lapham, BWBR
- James Brummer, AVP for Facilities Management, University of St. Thomas
- Amy Gage, Director of Neighborhood and Community Relations, University of St. Thomas

**City of Saint Paul
Heritage Preservation Commission Resolution**

Address: 2115 Summit Avenue (University of St. Thomas – Loras Hall)

Date: November 30, 2020

Memorializing the Saint Paul Heritage Preservation Commission’s November 30, 2020 decision to approve the University of St. Thomas’ application to demolish Loras Hall.

1. On March 1, 1990, the Summit Avenue West Heritage Preservation District was established under Ordinance No. 17716 § 1, reflecting today’s boundaries. The Heritage Preservation Commission is charged with protecting the architectural character of heritage preservation sites through review and approval or denial of applications for City permits for exterior work within designated heritage preservation sites.
2. Loras Hall is located within the Summit Avenue West Heritage Preservation District.
3. The standards for evaluating a request for demolition of a building located in the Summit Avenue West Heritage Preservation District are set forth in the City’s Legislative Code section 73.06(i)(2).
4. A building is not historically or architecturally significant simply because it was designed by a prominent architect.
5. Although Loras Hall was designed by noted architect Cass Gilbert, Loras Hall lacks historic and architectural integrity.
6. Loras Hall was originally designed to be part of a quad-type campus layout which no longer exists and, individually, Loras Hall does not convey associations with events, patterns or persons significant in history.
7. Loras Hall was not designed with regard to Summit Avenue and as such its primary façade does not face Summit Avenue.
8. The West Summit Avenue Historic District is a collection of residential architecture from the early twentieth century and provides the largest unbroken avenue of Colonial Revival and Classical Revival-style architect-designed houses in the Twin Cities.
9. Loras Hall, individually, lacks architectural distinction. While it demonstrates some elements of the Renaissance Revival style, it lacks many common elements of this style such as classical details and an arcaded or rusticated ground level.

10. Loras Hall does not have historical merit as it has been determined that Loras Hall lacks sufficient architectural integrity to be included on the National Register of Historic Places.
11. The demolition on Loras Hall will not have a negative impact on surrounding buildings which are largely new construction and parking lots.
12. The usefulness of Loras Hall is extremely limited due to the fact that it is not insulated, it lacks an efficient heating system, does not have any air conditioning and has limited air flow.
13. The continued usefulness of Loras Hall is limited by the fact that utility costs are 40-60% higher than would be achieved in a building designed to today's standard of energy efficiency.
14. A renovation estimate received from McGough shows that it would cost more than \$10 million to bring Loras Hall to current standards.
15. The usefulness of Loras Hall is vastly outweighed by the proposed STEAM building on the University of St. Thomas St. Paul campus at this location.
16. The demolition will have no adverse effect on the Summit Avenue West Heritage Preservation District.

NOW, THEREFORE, BE IT RESOLVED, the Heritage Preservation Commission approves the application for demolition of Loras Hall at the University of St. Thomas.

Moved By:
Seconded By:

IN FAVOR
AGAINST
ABSTAIN