



December 23, 2020

City of St. Paul Department of Planning and Economic Development  
25 West 4<sup>th</sup> Street, Suite 1300  
Saint Paul, MN 55102

Dear Councilmembers:

The University of St. Thomas respectfully asks you to overturn the December 14, 2020 decision of the St. Paul Heritage Preservation Commission to deny issuance of a demolition permit for Loras Hall, a building located on our south campus. Overturning the HPC's decision will allow us to prudently invest our students' tuition dollars and limited donor funds to directly benefit our current and future students.

As you will read in the following materials, St. Thomas is preparing to build a state-of-the-art STEAM (Science, Technology, Engineering, Arts, and Math) building in proximity to our existing science and engineering buildings. This complex will ensure that we serve students in growing, high-demand fields such as health care, engineering and other sciences; and diversify these fields as we intentionally welcome more students and faculty of diverse backgrounds to St. Paul.

This building provides a tremendous opportunity for St. Thomas while also meeting many shared goals of the City of St. Paul. The new space will allow our engineering and arts programs to collaborate with public and private K-12 programs and will offer performance and gathering spaces that neighbors, community leaders and nonprofits can enjoy. Additional green space will benefit neighbors and those who travel through campus for recreation.

The University of St. Thomas greatly respects the history that has shaped the development of our St. Paul campus and the City of St. Paul. We are proud to anchor beautiful, historic Summit Avenue and appreciate its tradition and beauty. We will continue to invest in valued historic buildings on our campus. However, as an educational institution serving current and future students, we must balance the preservation of old buildings with the primary educational needs of our students and community.

Thank you for your consideration to this matter and for your service to St. Paul.

Sincerely,

A handwritten signature in black ink that reads "Julie H. Sullivan".

Julie H. Sullivan, Ph.D.  
President  
University of St. Thomas

c: Mayor Melvin Carter  
Jaime Tincher, Chief of Staff, City of St. Paul  
Councilmember Mitra Jalali  
Josh Williams, City of St. Paul  
Tia Anderson, Principal City Planner, City of St. Paul



December 23, 2020

Tammera R. Diehm  
Direct Dial: (612) 604-6658  
Direct Fax: (612) 604-6958  
tdiehm@winthrop.com

City of St. Paul Department of Planning  
and Economic Development  
City Hall Annex  
25 West 4<sup>th</sup> Street, Suite 1300  
Saint Paul, MN 55102

**VIA E-MAIL**

Re: Notice and Statement of Grounds for Appeal of HPC Denial of Demolition Permit for  
Loras Hall located at 2260 Summit Avenue

Dear Councilmembers:

On behalf of the University of St. Thomas (the “University” or “St. Thomas”), we submit this appeal in response to the December 14, 2020 decision of the St. Paul Heritage Preservation Commission (“HPC”) to deny issuance of a demolition permit (the “Permit”) for a building located at 2260 Summit Avenue, and known as Loras Hall. This appeal is filed pursuant to St. Paul Code (“Code”) Section 73.06 (h), which provides that “the permit applicant or any party aggrieved by the decision of the heritage preservation commission shall, within fourteen (14) days of the date of the heritage preservation commission's order and decision, have a right to appeal such order and decision to the city council.” We understand from HPC staff that no fee is required in connection with this appeal. If a fee is required, or if you need additional information that is not contained in this submission, please let us know.

As noted in the University’s application materials (the “Application”) and as affirmed by testimony at the public hearing on December 14, 2020 (the “HPC Hearing”), the Permit requested by the University of St. Thomas satisfies the standards for demolition outlined in Code Section 73.06(i)(2). In addition to this letter, which provides the grounds for appeal, we encourage you to review the entire Application as well as the record from the HPC Hearing. In doing so, you will see that HPC’s denial of the Permit is not supported by the facts. Instead, the HPC inappropriately focused on arbitrary considerations including whether the University had sought sufficient community input, and whether St. Thomas had adequately considered alternate options and locations for the \$100 million Science, Technology, Engineering, Arts and Math (STEAM) building that is proposed to be constructed on the site where Loras Hall sits today. Accordingly, and for the reasons outlined below, the University respectfully requests that the City Council reverse the decision of the HPC and approve the issuance of a demolition Permit for this property.

**I. The University has provided extensive evidence to support the findings required by the Code for the approval of the Permit.**

Section 73.06(i)(2) of the Code provides that, in the case of the proposed demolition of a building, prior to approval of said demolition, the commission shall make written findings with respect to very specific criteria:

1. Architectural and historical merit of the building;
2. The effect of the demolition on surrounding buildings; and
3. The economic value or usefulness of the building as it now exists or if altered or modified in comparison with the value or usefulness of any proposed structures designated to replace the present building or buildings.

Importantly, these three criteria are the factors that HPC is required to consider when evaluating a request for a demolition permit. While the Code does not provide direction as to the relative weight of each of these factors, the Code is clear that these factors are the basis by which demolition permits should be evaluated, not additional factors that HPC members choose to focus on.

Despite substantial evidence that (a) Loras Hall lacks architectural and historical significance; (b) the demolition of Loras Hall will not have a detrimental impact on any surrounding building; and (c) the economic value and usefulness of the proposed STEAM building far outweighs the economic value and / or usefulness of Loras Hall (both as it exists now and how it could be improved), the HPC denied the application and instead encouraged St. Thomas to go back and explore ways to continue to use this facility. Through this appeal, the University asks the Council to review the standards outlined in the Code and the information presented and reverse the decision of the HPC and grant the Permit.

**II. The findings adopted by HPC are not supported by the facts and do not address the criteria outlined in the Code for evaluation of the Permit.**

Following consideration of an extensive Application package and testimony at the HPC Hearing, the HPC adopted written findings to deny Permit (the “Findings”). A copy of the adopted Findings is attached. As outlined in this letter, the original Application and the testimony at the HPC Hearing, the Findings are not supported by the facts. In addition, the Findings do not address the criteria set forth in the Code for evaluating the demolition Permit. Our response to each of the specific Findings are addressed below:

- HPC Finding #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 shall protect 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 §74.21(4).

**RESPONSE: This finding simply memorializes the fact that HPC is charged with protecting the architectural character of heritage preservation sites. Importantly, the Finding fails to clearly state the criteria by which HPC is to evaluate requests and applications.**

While St. Thomas does not object to this particular Finding, it highlights the lack of clarity with which HPC reviewed the Application. As noted under Section I above, Section 73.06(i)(2) of the Code provides clear guidance to HPC regarding the three specific criteria that must be considered when evaluating requests involving the demolition of a building: (a) architectural and historic merit of the existing structure; (b) the impact of demolition on surrounding buildings; and (c) the economic value or usefulness of the existing building as compared to what is proposed to replace it. These criteria are conspicuously absent from the Findings.

- **HPC Finding #2: *Loras Hall is a contributing structure to the locally designated Summit Avenue West Heritage District.***

**RESPONSE: The first criteria listed by the Code requires a finding that the property has architectural or historic merit. While Loras Hall is a contributing structure, its status as a contributing structure is not prima facie evidence of its architectural or historical significance. In fact, Loras Hall does not have the significant character defining features that the Summit Avenue West Heritage District seeks to protect and therefore, this Finding is not an appropriate reason to deny the Permit.**

A “contributing building” is defined as a building located within a historic district that contributes to the historic character of that particular district. However, HPC’s finding that Loras Hall is a contributing structure to the locally designated Summit Avenue West Heritage District is not determinative because being a “contributing structure” does not, in and of itself, establish the historic or architectural merit or significance of a specific building. In fact, the National Register of Historic Places nomination for the West Summit Avenue Historic District (the “Nomination”) makes it clear that Loras Hall does **not** have the character defining features that are deserving of protection. 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.*

(emphasis added). 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.”

Accordingly, the significance of the West Summit Avenue Historic District is its collection of **residential** architecture from the early twentieth century. Loras Hall is not a large house, it is not a residential property and it was not built between 1900 and 1929. In fact, according to the report, the inclusion of the St. Paul Seminary, University of St. Thomas, and Macalester College campuses within the historic district boundaries was done to create one continuous district, not because these campuses were examples of the buildings that deserved protection.

Loras Hall does not even face Summit Avenue and the only portion of the building that is visible from the “unique avenue” is the fire escape door. So while it is true that Loras Hall is listed as a “contributing building” this designation does not make Loras Hall architecturally or historically significant and the demolition of this building will not have any significant impact on the surrounding properties or the historic district.

- HPC Finding #3: *Loras Hall has been determined to be potentially eligible to the National Register of Historic Places in a 2017 report by Hess Roise and Company.*

**RESPONSE:** The first criteria listed by the Code requires a finding that the property has architectural or historic merit. Finding that a property is “potentially eligible” to be listed on the National Register of Historic Places is not evidence of historic or architectural significance and therefore, this Finding is not an appropriate reason to deny the Permit.

Again, the criteria established by the Code is whether the property in question has architectural or historical significance. While eligibility for inclusion on the National Register of Historic Places may be one indication of historic significance, the 2017 Hess Roise and Company assessment (the “Assessment”) does **not** suggest that Loras Hall should be listed on the National Register of Historic Places. At best, the Assessment is neutral on this subject and, in fact, the Nomination makes clear that Loras Hall does **not** have the character defining features that make the historic district worthy of protection and preservation. Loras Hall is **not** individually included in the National Register of Historic Places.

- HPC Finding #4: *The structure was designed by noted architect Cass Gilbert. It was an important commission for him and represented a significant milestone in the development of his career.*

**RESPONSE:** The first criteria established by the Code requires a finding that the building has architectural and historical merit. While Loras Hall was designed by Cass Gilbert, not all buildings designed by noted architects are architecturally or historically significant and therefore, this Finding is not an appropriate reason to deny the Permit.

While this particular finding appears to be an attempt by HPC to demonstrate that the Loras Hall has architectural or historical significance, the Finding fails to do so because not all buildings that are designed by prominent architects are “significant.” The National Park Service, the agency

charged with reviewing and granting requests for historic status, is very clear about this, noting in their guidance that a property is not architecturally significant simply because it was designed a prominent architect. The Park Service uses the example of Frank Lloyd Wright and argues that not every building designed by Frank Lloyd Wright should be eligible for protection. Instead, you must look at the building itself. Using this same logic, the fact that Loras Hall was designed by Cass Gilbert does not, in and of itself, mean that Loras Hall should be protected as an architecturally significant building. Instead, it is important to look at the context within which the building was designed. We provide extensive information on this topic in our written submission but the bottom line is that Loras Hall lacks historic and architectural merit and should not be preserved simply because of who designed it.

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 (before the seminary was adopted by St. Thomas), and as demonstrated in the Hess Roise report, the seminary campus lacks historic integrity today and, therefore, can no longer convey this significance. It is notable that the Cass Gilbert Society, an organization that was expressly established to honor Cass Gilbert and his architecture, doesn't even list Loras Hall as a Cass Gilbert building on their website.

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 facade, 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 James J. Hill's micromanagement as much as Gilbert's design work, and it does not illustrate the architect's considerable talents.

- HPC Finding #5: *The application for demolition fails to account for the merit, effect and the value of Loras Hall. The application's focus is the assessment of the demolition in terms of the new academic building that may be constructed.*

**RESPONSE: The third criteria established in the Code requires HPC to compare (and consider) the usefulness of Loras Hall, as it now exists, with the usefulness of any**

**building that is proposed to be constructed in its place. In fact, the University did consider the merit, effect and value of Loras Hall in completing this analysis and provided overwhelming evidence that the value and usefulness of Loras Hall is far outweighed by that of a new STEAM facility.**

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. First, the building itself is extremely inefficient and lacks sustainability. It was built in 1894, it is not insulated, it lacks an efficient heating system, it has no air conditioning or force-aided ventilation, and it has poor 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 LEED certified STEAM building. In addition, over 72 window air conditioners are installed in Loras Hall every summer to mitigate the excessive heat and make the space usable for those who work there. While we do 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 rooms, including faculty offices, music practice rooms, a credit union, prayer rooms, and storage. Even with a significant financial investment – estimated by McGough Construction Company, Inc. to be over \$10 million dollars – in construction costs only - the building's construction manner and configuration limit the way in which it can be used. Loras Hall has a single central hallway on each floor with loadbearing interior walls that support the floors and roof structure. Creating larger, more functional spaces are simply not feasible. 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 large, 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.

HPC Commissioner Nelson perhaps said it best at the HPC Hearing when he noted that it is “undeniable” that there is a “tremendous imbalance” between the economic value and usefulness of Loras Hall (even as improved) as compared to what is proposed for a new STEAM building.

- HPC Finding #6: *The demolition would adversely affect the Program for the Preservation and architectural control of the Summit Avenue West Preservation District.*

**RESPONSE. The second criteria in the Code states that HPC should consider the effect of demolition on surrounding buildings. The Finding above, that the demolition of Loras Hall will adversely impact the Summit Avenue West Preservation District is wholly unsupported by the record. The demolition of Loras Hall will not adversely impact the surrounding properties and therefore, this Finding is not a reason to deny the Permit.**

While not artfully drafted, finding number 5 in the HPC resolution appears to speak to the standard of whether demolition of the structure will have a detrimental impact on surrounding properties.

Loras Hall is an island within a sea of parking lots. It is not a residential house on Summit Avenue and the removal of Loras will not leave a hole in an otherwise well-organized row of residential historic homes. In fact, its demolition will really have no impact on any surrounding buildings. As a result, this criteria on impact to surrounding buildings is not a reason to deny the Permit.

It is again worth quoting Commissioner Nelson’s remarks at the HPC Hearing, when he noted “I have come to the conclusion that St. Thomas has made the case that, all things considered, Loras Hall can be demolished without undue damage to our historic heritage.” We agree with Commissioner Nelson. While the decision to demolish any building in the historic district deserves careful consideration, in this particular instance, St. Thomas has provided evidence to show that the demolition of Loras Hall will not have a detrimental impact on the surrounding properties.

**III. In denying the Permit, HPC inappropriately focused on arbitrary findings such as the level of community involvement that had occurred in the University’s planning process.**

The level of community involvement is not one of the three criteria HPC is asked to evaluate when considering a permit for the demolition of a building in a historic district. Yet, in the staff report that was prepared by HPC, and in conversation between commissioners at the HPC Hearing, HPC devoted considerable time to the question of whether St. Thomas had appropriately considered other options for the building as well as whether the University had sought an appropriate level of community input. The staff report suggested that an “independent, robust exploration of options is needed with independent reviewers from the community.” While independent community review is not required by the Code, in evaluating options, the University has engaged in extensive community discussions. During a five month period, St. Thomas representatives met with neighborhood and community groups to get feedback on our proposals – both the proposed demolition of Loras Hall and the proposed construction of a new STEAM facility in its place. These conversations have helped St. Thomas explore, and address, potential concerns. These meetings included over ten (10) separate presentations to Summit Avenue Residential Preservation Association (SARPA), the West Summit Neighborhood Advisory Committee (WSNAC), Union Park District Council Committee on Land Use and Economic Development, Union Park District



Council Board, Macalester Groveland Community Council Housing and Land Use Committee and the Macalester Groveland Community Council Board. These conversations also provided the University with useful feedback with respect to future design plans with respect to both the building as well as the siting of the building on the campus.

As a result of these discussions, the Macalester Groveland Community Council voted to support our proposal 14-1. The Union Park District Council voted in significant majority to support the University's proposal. 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 SARPA voted to oppose the demolition of Loras Hall, we have received support from several other Summit Avenue homeowners.

By engaging in community discussions, the University has, in fact, had independent voices participate in the process. Importantly, future community participation is guaranteed through the permitting process that will be required before the new STEAM building can be constructed.

#### **IV. The University has a strong commitment to historic preservation**

In denying the Permit, HPC seemed to suggest that the University was not concerned with historic preservation. In fact, historic preservation is extremely important to St. Thomas and the University has a proven track record of investing in preservation. Emmanuel Masqueray is another noted architect who is known for his design of the St. Paul Cathedral and the Minneapolis Basilica. The University is fortunate to have two Masqueray buildings on its campus - the Chapel of Saint Thomas Aquinas and Ireland Hall. Over the past two years, the University has spent approximately \$24 million on interior and exterior renovations and expansion of those buildings.

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 at a future date) in its place, the University will actually contribute to the magnificence that Horace Cleveland imagined when he designed Summit Avenue. As noted above, the only portion of Loras Hall that is even remotely visible from Summit Avenue today is the fire escape door 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.

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 consultants with deep experience in historic preservation including Andrew Schmidt, who has nearly 30 years of experience 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 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 the HPC sponsored neighborhood surveys.

The history of Archbishop John Ireland (founder of the Saint Paul Seminary), his donor James J. Hill and Hill's architect Cass Gilbert is important to the university, given the role that history plays in the early development of the University of St. Thomas. With successful approval of the Permit, the University intends to provide a permanent installation in the STEAM building to recognize the contributions of the individuals to the history of the West Summit Avenue neighborhood, the city of St. Paul, and St. Thomas. Between 3,000 and 3,500 people per day would be exposed to this historical and educational information in the new STEAM building. The design of this installation will utilize community input to afford the broadest perspective of the contributions made by these individuals on this site.

#### **V. Conclusion**

In conclusion, we respectfully request that the Council overturn the decision of HPC and grant the demolition Permit that has been requested by St. Thomas. In considering this request, we ask the Council to carefully consider the three criteria that the Code includes for evaluating the requested Permit:

- 1) Architectural and historical merit of the building;
- 2) The effect of the demolition on surrounding buildings; and
- 3) The economic value or usefulness of the building as it now exists or if altered or modified in comparison with the value or usefulness of any proposed structures designated to replace the present building or buildings.

In reviewing the extensive record, and these criteria, we urge you to acknowledge that Loras Hall does not have significant architectural or historic merit and its demolition will not have a significant impact on surrounding buildings. Perhaps most importantly, we urge you to find that the economic value and usefulness of Loras Hall is significantly outweighed by the economic value and usefulness of the building that will be designated to replace it. Based on this, and all of the other information contained in the record in connection with this Application, the decision of the HPC should be reversed and the Permit should be granted.

Very truly yours,

WINTHROP & WEINSTINE, P.A.



Tammera R. Diehm

**CITY OF SAINT PAUL  
HERITAGE PRESERVATION COMMISSION RESOLUTION**

**ADDRESS: 2260 Summit Avenue (University of St. Thomas-Loras Hall)  
DATE: December 14, 2020**

**Memorializing the Saint Paul Heritage Preservation Commission’s December 14, 2020 decision to deny the application for demolition.**

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 shall protect 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 §74.21.(4).
2. Loras Hall is a contributing structure to the locally designated Summit Avenue West Heritage District.
3. Loras Hall has been determined to be potentially eligible to the National Register of Historic Places by *The University of St. Thomas, The St. Paul Seminary and Historic Summit Avenue: An Assessment of Cultural Resources* by Hess Roise and Company (2017).
4. The structure was designed by noted architect Cass Gilbert. It was an important commission for him and represented a significant milestone in the development of his career.
5. The application for demolition fails to account for the merit, effect and value of Loras Hall. The applications focus the assessment of the demolition in terms of the new academic building that may be constructed.
6. The demolition would adversely affect the Program for the Preservation and architectural control of the Summit Avenue West Preservation District (Leg. Code §73.06 (e)).

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

**MOVED BY: Bezat  
SECONDED BY: Douglas**

**IN FAVOR 6  
AGAINST 1 (Nelson)  
ABSTAIN 0**

Decisions of the Heritage Preservation Commission are final, subject to appeal to the City Council within 14 days by anyone affected by the decision. This resolution does not obviate the need for meeting applicable building and zoning code requirements.