



January 18, 2007

The Hon. William D. Euille  
City of Alexandria  
301 King Street  
Alexandria, VA 22314

Re: St. Paul's Episcopal Church, 228 S. Pitt Street / BAR CASE #2006-0213, -0214

Dear Mayor Euille:

I am writing on behalf of the National Trust for Historic Preservation to express our strong support for the careful preservation of historic St. Paul's Episcopal Church, which is located within the Old and Historic Alexandria District. We understand from the Old Town Civic Association and local members of the National Trust that on January 20, 2007, the City Council will hear an appeal to a November 1, 2006, decision of the Board of Architectural Review ["BAR"] regarding proposed changes to St. Paul's Episcopal Church. The National Trust respectfully encourages the City Council to reverse and remand the BAR decision for further consideration of alternative designs that are not physically attached to the historic buildings, do not require partial demolition of historic fabric, and do not have a visual impact on the historic church or its environs.

In our view, St. Paul's Episcopal Church is one of the most significant historic religious properties in Virginia and the nation. Importantly, St. Paul's is listed on the Virginia Landmarks Register and the National Register of Historic Places. It is an architectural gem by one of the nation's great early architects, Benjamin Henry Latrobe. In fact, according to architectural historian Calder Loth, "St. Paul's is the only surviving Gothic Revival building associated with Benjamin Henry Latrobe, America's first professional architect, and is Latrobe's only remaining work in Virginia." According to Mr. Loth, St. Paul's is a "pioneering landmark of American Gothic Revival." [*The Virginia Landmarks Register*, Fourth Edition, p. 28.]

As the City Council is aware, the Applicant is seeking a Permit to Demolish / Capsulate and a Certificate of Appropriateness for alterations in order to enclose an exterior light well, or "garth," between Latrobe's main sanctuary of St. Paul's Episcopal

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Church and the adjoining 1899 Norton Hall. The project involves construction of a new sloping glass-and-aluminum skylight roof attached to the walls of the main sanctuary and Norton Hall and a new roof gable and gutter system attached to Norton Hall. The record indicates that the Applicant proposes the alterations “in order to convert the underutilized light well or garth area between Norton Hall and the main sanctuary to a more functional, enclosed space, with new ADA ramps and stairs.” [Exhibit 1, p. 13.] “The underutilized [garth] space will provide additional internal ADA accessible ramps between Norton Hall and the main sanctuary building. The work is part of a major renovation of church facilities intended to improve functioning and gain handicapped accessibility.” [Exhibit 1, p. 20.]

With regard to handicapped accessibility, the *Design Guidelines for the Old and Historic Alexandria District* state: “One of the biggest challenges facing historic buildings open to the public is making them accessible to persons with disabilities without destroying their historic or architectural character. ... There are a number of means of making buildings in the historic districts accessible without unduly compromising the historic integrity of the structure. *Alternatives to physical changes to a building should be explored before considering undertaking alterations.*” [Guidelines, p. 34, 35 (emphasis added).] (We note that the *Design Guidelines* state that “religious structures are exempt from the [accessibility] requirements” of the Uniform Statewide Building Code and Americans with Disabilities Act. [Guidelines, p. 34.]) With regard to construction of the skylight roof, the *Design Guidelines* state: “Skylights can become prominent elements on a building and can disrupt the visual continuity and profile of a roof-line. The Boards actively discourage the visual disruption of a historic roof profile with a skylight. *Skylights should only be added to a building after all other options for light and ventilation have been explored.*” [Guidelines, p. 113 (emphasis added).]

According to the BAR staff report, the new skylight roof and the new roof gable and gutter system “will only be minimally visible from South Pitt Street.” [Exhibit 1, p. 14.] The BAR staff also feels the Applicant “made significant efforts to minimize the impact of the method of attachment” and “has gone to great lengths to minimally impact the integrity of the buildings.” [Exhibit 1, p. 12, 22.] However, it is not clear from the record whether the Applicant explored alternatives that would not be physically attached to the historic buildings and that would not be visible from the public way. The National Trust commends the Applicant for seeking to improve handicapped accessibility, but we encourage further exploration of design options that would be free-standing or pressure-fit to the landmark church. (As the *Design Guidelines* suggest, it may be helpful to consult with Virginia’s State Historic Preservation Officer regarding alternative means to achieve handicapped accessibility.)

With regard to a Permit to Demolish / Capsulate, the BAR is required to consider “any or all” of the six criteria set forth in Article X, Section 10-105(B). However, it appears that the BAR chose not to apply Criteria (1) – (5) of Section 10-105(B) in this

matter, concluding that: “Criteria (1) through (5) *clearly do not apply* in respect to the circumstances of this request for a Permit to Demolish/Capsulate as they are intended to encompass more of a request for a complete demolition of a building or structure, not partial encapsulation.” [Exhibit 1, p. 6 (emphasis added).] Therefore, the Board of Architectural Review applied only Criteria (6) and “found the proposed amount of encapsulation was appropriate.” [Exhibit 1, p. 6.]

The National Trust respectfully recommends that the BAR should have applied, and that the City Council on appeal now should apply, Criteria (1), which states: “Is the building or structure of such architectural or historical interest that its moving, removing, capsulating or razing would be to the detriment of the public interest.” It is generally accepted that St. Paul’s Episcopal Church is of great architectural and historical interest. We presume that the Appellants will argue that “capsulating” the north wall of Latrobe’s main sanctuary in order to attach a glass-and-aluminum skylight roof is not in the public interest.

With regard to a Certificate of Appropriateness, the BAR is required to consider all ten standards set forth in Article X, Section 10-105(A)(2). However, it appears that in this case the BAR concluded instead that “Standards (b), (d), and (e) are the most relevant to the alterations requested by the applicant.” [Exhibit 1, p. 7.] The record before the City Council indicates that the BAR applied only Standards (b), (d), and (e), and “used *these* standards ... to determine if approval of the Certificate of Appropriateness was warranted [and then] found that ... the proposed alterations to the church ... were appropriate and compatible to the building.” [Exhibit 1, pp. 7, 8 (emphasis added).] It may be that the record on appeal is incomplete, and that the BAR, in fact, applied all ten standards. However, in the National Trust’s view, when passing upon the appropriateness of the proposed alterations to St. Paul’s Episcopal Church, Standards (a) and (c) would have afforded the BAR an opportunity to consider the “[o]verall architectural design, form, style, and structure” of the proposed glass-and-aluminum skylight roof and its “impact upon the historic setting, streetscape, or environs.” We presume that the Appellants will argue that the proposed alterations would be visibly intrusive and incompatible with the historic church.

Finally, the BAR expressed concern that once the north exterior wall of the Latrobe sanctuary is enclosed it would become an *interior* wall not subject to the BAR’s purview. Consequently, the BAR approved the project subject to a requirement that the Applicant “agree to a formal and legally binding easement” that would require alterations to the north wall “to be reviewed and approved by the Board.” [Exhibit 1, p. 5.] Many historic religious buildings are protected by preservation easements. However, the record shows that the Applicant rejected the BAR’s easement condition at the November 1, 2006, meeting. The BAR report states: “However, the legal representative of the applicant stated at the meeting that he could not commit on behalf of the church to the

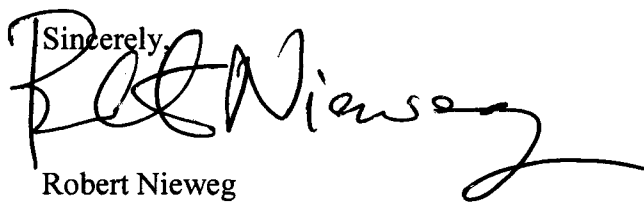
condition regarding the legally binding easement due to the legal processes involved for a religious property in Virginia to grant such an easement.” [Exhibit 1, p. 5.]

Arguably, the Applicant’s rejection of the permit condition nullifies the BAR decision now on appeal before the City Council. In any case, if on remand further consideration is given to requiring an easement as a condition of the permit, the National Trust would recommend that the BAR and Applicant obtain a legal analysis of the proposed easement as a permit condition. We also recommend consultation with the Alexandria Historical Restoration and Preservation Commission and the Virginia Department of Historic Resources.

In conclusion, Alexandria is a uniquely significant city with world-class architecture and unforgettable history. There is no city in America quite like Alexandria. To its credit, through public and private initiative, Alexandria is an acknowledged leader in Virginia and the nation’s historic preservation movement and cultural heritage tourism industry. The National Trust has great respect for the Board of Architectural Review and commends its members for their important public service. However, civic leaders in Alexandria must make every effort to ensure that the city’s irreplaceable historic resources are adequately protected for future generations to enjoy. Indeed, protecting historic religious properties is one of the most important tasks faced by preservationists. The value of these buildings goes far beyond religion. They play an enormously significant role in a community’s life and sense of place. If these often-vulnerable assets are lost, we can never get them back.

Therefore, in light of the historic and architectural value of St. Paul’s Episcopal Church, the National Trust for Historic Preservation respectfully encourages the City Council to reverse and remand the November 1, 2006 BAR decision. We urge further consideration of design alternatives that achieve the Applicant’s goals but that are not physically attached to the historic buildings, do not require partial demolition of historic fabric, and do not have a visual impact on the historic church or its environs.

Thank you in advance for considering the views of the National Trust.

Sincerely,  
  
Robert Nieweg  
Director, Southern Field Office  
National Trust for Historic Preservation

cc: Kathleen Kilpatrick, Virginia Department of Historic Resources  
Elizabeth Kostelney, APVA-Preservation Virginia