



**National Trust for
Historic Preservation**
Save the past. Enrich the future.

December 9, 2022

VIA EMAIL: mconeil@burlingtonvt.gov

Ms. Mary O'Neil
Office of Permitting & Inspections
City of Burlington
P.O. Box 849
Burlington, VT 05402-0849

Re: ZP-22-576 / Demolition Permit Application for Burlington Cathedral

Dear Ms. O'Neil:

On behalf of the National Trust for Historic Preservation, I am writing to strongly support preservation and adaptive re-use of the former Cathedral of the Immaculate Conception, its belltower, and designed landscape. In 2013 these historic structures and their surrounding landscape were officially determined eligible for listing on the National Register of Historic Places, which is our nation's list of historic resources that merit preservation, by the Vermont Division of Historic Preservation, Vermont Agency of Transportation, and Federal Transit Administration under the National Register's Criteria Consideration G for historic properties of exceptional importance that have achieved significance in the last fifty years. Burlington's historic preservation protections apply to all such properties, like the former church and its landscape, that are considered eligible for listing on the National Register of Historic Places.

For more than seventy years, the National Trust for Historic Preservation has led the movement to save America's historic places. A privately funded nonprofit organization, the National Trust works to save America's historic sites, tell the full American story, build stronger communities, and invest in preservation's future. The National Trust joins Preservation Burlington, Docomomo US/New England, New England Chapter of the Society of Architectural Historians, and The Cultural Landscape Foundation to support adaptive reuse of this Modernist landmark and landscape. Created by renowned designers Edward Larrabee Barnes and Dan Kiley, these cultural heritage landmarks distinguish the City of Burlington and contribute to its treasured sense of place. If the National Register-eligible historic building, belltower, and landscape are protected in accordance with the City's established historic preservation goals, these highly

significant historic and cultural resources can continue to benefit the public interest for generations to come.

By contrast, however, the proposed demolition, removal, and replacement of the historic structures and landscape with some as-yet-unspecified new development would irrevocably destroy a cultural landmark and unnecessarily waste building materials. It is widely understood that building reuse avoids the carbon emissions incurred when the materials needed for a new structure are mined, manufactured, transported, and assembled. It takes between ten and eighty years to overcome the carbon emissions debt that is incurred when an existing structure is replaced, even if the new building is highly energy efficient. Importantly, demolition may expose workers and neighbors to health risks from a range of hazardous materials, such as asbestos, lead paint, and crystalline silica. Finally, data from the Environmental Protection Agency shows that demolition and construction debris account for more than two times the amount generated by municipal solid waste.

If, instead, the historic building, belltower, and landscape were to be properly preserved and adaptively reused, the garden-like landscape can provide a park in the heart of Burlington and the former church building can provide distinctive new space for the cultural arts and other community-serving uses to enrich the lives of Burlington's residents and visitors. In communities across the country, by fully exploring options for rehabilitating and adaptively reusing historic structures, many former houses of worship have been successfully preserved and repurposed as cultural arts spaces, including: St. Joseph's Church, now St. Joseph's Arts Foundation, in San Francisco, California; Church of the Epiphany in Chicago, Illinois, now known as Epiphany Center for the Arts; and, Shiloh Baptist Church in Philadelphia, Pennsylvania, which is now the permanent home of a dance theater group. Of course, this sort of creative adaptive reuse is at the heart of Burlington's historic preservation protections.

As you are aware, there is great concern in the local community that this opportunity for preservation and adaptive reuse will be lost if the demolition permit is supported by the Design Advisory Board or approved by the Development Review Board. Consequently, the National Trust for Historic Preservation has received and is considering a nomination submitted by a resident of Burlington to feature the threatened building, belltower, and landscape on the National Trust's 2023 list of America's Eleven Most Endangered Historic Places. In 2022, our national most-endangered list raised awareness about threats to a set of unique and irreplaceable historic places, eliciting 1.7 billion media impressions.

It is our understanding that the owner has deconsecrated the historic building and intends to sell the property for some "non-sacred" purpose, according to the Oct. 27, 2022, demolition permit application. However, it appears that the demolition permit application, as submitted, is incomplete and cannot be approved by the City. In fact, in its application to demolish the historic property, the owner expressly acknowledges that

the owner has not submitted the mandatory redevelopment plan or the “statement of the effect of the proposed redevelopment on the architectural and historical qualities” of its downtown Burlington neighborhood, as required by City regulations. In the absence of a redevelopment plan, the owner has not complied with the requirements of Section 5.4.8(d)(1)-(2)(A-F), “Demolition of Historic Buildings.” Despite the binding requirement to do so, the owner’s demolition permit application has not demonstrated, for example, that the historic building is structurally unsound, or that the building cannot be adaptively reused, or that benefits of whatever redevelopment may occur will outweigh the historic or architectural significance of the National Register of Historic Places-eligible historic building, belltower, and landscape. Consequently, pursuant to Section 5.4.8(d)(2), which states that demolition “shall only be approved” when the standards established by Section 5.4.8(d)(2) are met, the proposed demolition should not be reviewed and cannot be approved by the Design Advisory Board or the Development Review Board.

In closing, the National Trust for Historic Preservation urges the City of Burlington, first, to deny the demolition permit application and, second, to take all available steps with the owner to promote preservation and adaptive reuse of this unique and irreplaceable historic building, belltower, and landscape in furtherance of the City’s historic preservation goals.

Sincerely,

A handwritten signature in black ink that reads "Rob Nieweg". The signature is written in a cursive, flowing style.

Rob Nieweg
Senior Vice President, Preservation Services & Outreach

cc: Preservation Burlington
Vermont Division for Historic Preservation