



**ST. THOMAS / ST. JOHN  
CHAMBER**

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**2023-2024**

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*January 26, 2024*

**HONORABLE MILTON E. POTTER**

**Senator/Chairman, Committee on Disaster Recovery, Infrastructure, and Planning  
35<sup>th</sup> Legislature of the United States Virgin Islands  
Capitol Building, Charlotte Amalie  
St. Thomas, Virgin Islands 00802**

*Via Email*

**RE: STATEMENT TO BILL #35-0202**

Dear Senator Potter:

Thank you for the opportunity to review and comment on BILL #35-0202.

While my response on this Bill is on behalf of the St. Thomas-St. John Chamber of Commerce, this particular Bill affects my private advocacy as an Architect working in the Historic Districts of the Territory, and as a member/Chair of the Virgin Islands Board of Land Use Blue and Appeals (BLUA). BLUA adjudicates disputes/appeals that may arise from approvals and denials of permits. I have found in my more than four decades of practicing architecture that the Historic Preservation Commission (HPC) already takes into account the very items that are intent trying to be achieved with this Bill.

Recently, I have worked on two applications to the HPC that resulted in the approval and demolition of the Hamburg Building in St. Thomas, and the partial demolition of existing remnants of warehouse structures on Curacao Gade. The Hamburg Building is a structure long considered a historical landmark at the entrance to Downtown Charlotte Amalie. However, detailed structural reports have determined that the high level of salinity within its concrete structure will continue to deteriorate and finally destroy what is remaining of that building. This was the basis for the approval on the demolition of this building, to be rebuilt in a manner similar to what is similar to what is intended in this bill.

The Curacao Gade property also has deteriorated structures within the site that could not be rehabilitated to meet our present building codes. The Return On Investment to stabilize the portion of the structures this applied to could not be justified. The HPC approved partial demolition of some of the structures, preserving the portions of the site that were deemed historically significant. This is what should be the basis of the modernization of any site within the Historic Districts.

To simply state that only the façade of the structure will be preserved does not take into the account the historical significance the elements within the building that should be preserved. From my years within this industry, elements within a property that have been deemed historically significant have been the wells, chimneys, alley ways, and courtyards of our towns. Simply removing the significance of these historical elements compromises what is unique about our towns. I have witnessed the removal of these significant features in the town of Charlotte Amalie throughout my professional career. The beauty of the courtyards and alleyways of our historical towns along with historic features such as the wells and ovens/chimneys are worth preserving in any restoration or renovation venture.

From a regulatory point of view, this Bill will be difficult to administer on the part of the HPC and the BLUA if an appeal is filed regarding it. There is no basis for the destruction of the interior or exterior of this Bill in order to make a sound decision. If this Bill is to move forward, it should include some measure of structural evaluation, and Return-On-Investment evaluation to be included in any presentation to HPC. This can be used as the basis for the approval of demolition and reconstruction. In terms of the use of modern materials, our regulatory codes like the International Building Code already requires upgrades of structural and fire-resistive integrity in order to be permitted. This is what in many cases will allow for the use of modern materials and methods of construction. It should not be based upon a blanket statement of demolition.

In conclusion, these statements all lead to one firm statement, there should be justifications for demolishing the entire interior of an existing building.

Thank You!  
Yours Sincerely,

A handwritten signature in black ink that reads "John P. Woods". The signature is written in a cursive, flowing style with a large initial "J" and "W".

**John P. Woods, AIA, NCARB**  
President

Cc: St. Thomas-St. John Chamber Members –