

December 12, 2025

VIA E-MAIL

George Gause  
Heritage Preservation Supervisor  
St. Paul Planning & Economic Development  
25 4<sup>th</sup> St W  
St. Paul, MN 55102  
Sent by email: [george.gause@ci.stpaul.mn.us](mailto:george.gause@ci.stpaul.mn.us)

RE: Demolition of 799 University Avenue West  
St. Paul, Ramsey County  
SHPO Number: 2026-0130

Dear Mr. Gause:

Thank you for the opportunity to comment on the above project. Information received on November 19, 2025, has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and its implementing federal regulations, "Protection of Historic Properties" (36 CFR Part 800).

#### Definition of the Undertaking

We understand this project consists of demolition of the commercial building at 799 University Avenue West. Although the building has experienced damage due to a fire, the Order to Abate Nuisance Building (11/10/2025) attached to your project review request indicates that repair of the building is possible. You state that no known acquisition or future development is anticipated for this property.

#### Area of Potential Effects

We agree that the Area of Potential Effects (APE) as delineated and described on page 5 of *City of Saint Paul Section 106 Historic Effect Review* is appropriate to take into account effects of this project on historic properties.

#### Identification of Historic Properties

##### **Archaeology**

We agree that no further archaeological investigation is warranted.

##### **Architectural History**

Despite the information you provided about this property, we don't have enough information to agree that it is not eligible for inclusion in the National Register of Historic Places (NRHP). Further research is needed to fully understand this property's significance. For example, we note that the property is located in the historically African American community of Rondo in St. Paul and, in the mid-20<sup>th</sup> century, housed businesses owned by Chester "Chet" W. Oden, including the Ebony Lounge, known for hosting R&B artists.

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MINNESOTA STATE HISTORIC PRESERVATION OFFICE

50 Sherburne Avenue ■ Administration Building 203 ■ Saint Paul, Minnesota 55155 ■ 651-201-3287

[mn.gov/admin/shpo](http://mn.gov/admin/shpo) ■ [mnshpo@state.mn.us](mailto:mnshpo@state.mn.us)

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Additionally, this property is across the street from the potentially historic Rondo Historic District (RA-SPC-12095), recently identified in a survey for another ongoing Section 106 review ("Rethinking I-94" Project) and awaiting review by our office. Historic contexts for that project have been developed and likely would be useful for an evaluation of this property; they include a geographic context of the Rondo neighborhood and a thematic context of black history in the I-94 corridor. (See [https://edocs-public.dot.state.mn.us/edocs\\_public/DMResultSet/Urlsearch?columns=docnumber,docname&folderid=37174101](https://edocs-public.dot.state.mn.us/edocs_public/DMResultSet/Urlsearch?columns=docnumber,docname&folderid=37174101)). Your list of historic contexts reviewed for this property's evaluation doesn't include *Saint Paul African American Historic and Cultural Context, 1837 TO 1975 Ramsey County, Minnesota* (The 106 Group, May 2017); we believe that context would be useful.

We recommend that an intensive-level (Phase II) architectural history evaluation be completed meeting the requirements of the Secretary of the Interior's Standards for Identification and Evaluation. For a list of consultants who have expressed an interest in undertaking such surveys, please visit the website <https://www.mnhs.org/preservation/directory>, and select "Historians" in the "Search by Specialties" box.

A stub record for this property has been created in the [Minnesota Statewide Historic Inventory Portal](#) (MnSHIP) under **Inventory Number RA-SPC-13554**. The consultant should submit an **updated** inventory form for the record RA-SPC-13554 in MnSHIP.

#### Continuing Consultation

Please submit the intensive-level evaluation report and your finding, based on the results of the evaluation, to [ENReviewSHPO@state.mn.us](mailto:ENReviewSHPO@state.mn.us).

Please contact Leslie Coburn at [leslie.coburn@state.mn.us](mailto:leslie.coburn@state.mn.us) if you have questions regarding our review of this project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Amy Spong", is positioned above the typed name.

Amy Spong  
Deputy State Historic Preservation Officer