



June 21, 2017

Saint Paul Historic Preservation Commission
City Hall Annex
Saint Paul, MN 55102

Re: C&E Flats Apartments and Retail
2400 University Avenue West
HPC File #17-015

Ladies and Gentlemen:

On behalf of our development ownership entity ("Owner"), Exeter Group LLC hereby strongly objects to the HPC Staff Report dated June 22, 2017 (the "Report") denying our proposed storefront replacement for commercial spaces along University Avenue West. We believe the Report is erroneous for the following reasons:

1. The denial obstructs the Owner's ability to comply with building code and lease its space.
2. The Report's findings do not follow the University-Raymond Commercial Historic District Guidelines. Instead, the Report advocates that there be no change along a critical public transit corridor that has received a billion dollars of Federal, State and Local subsidies for the purpose of improving University Avenue and its surrounding neighborhoods.

In the Report's Findings, Section E, Items 3 and 6 reference Owner's request to replace existing and/or add new recessed alcove entries in certain storefront bays facing University Avenue. The recessed alcoves are necessary for safe, code compliant egress from the building on to the public sidewalk. Without the alcoves, the egress doors will swing in to the public right of way.

Three of the six existing storefront bays are already recessed. Commercial spaces, like these along University Avenue, are constantly changing over time. The six bays have been and will continue to be sub-divided in various ways in the future to meet leasing demand. The Owner's proposed layout reflects the needs of a restaurant tenant who would occupy the three most easterly bays. The code requires two egress doors a certain distance apart, making it necessary to have recessed alcove doors in the first and third bays (counting from the left, or east). Alternatively, it is also possible that the Owner could find six users each needing its own code compliant, recessed alcove entry. To deny these entries is inconsistent with the current condition of the property and obstructs the Owner's opportunity to lease its space.

The University-Raymond Commercial Historic District Guidelines allow for alterations that offer minimal change to the defining characteristics of the building, its site, and environment. The defining characteristics of this contributing building are its original historic use as a truck maintenance facility and its architectural compatibility within the District. The Owner is well within the guidance and has made no changes to the defining characteristics of the building – while making minimal alterations necessary to facilitate safe, code compliant storefront replacement so that the building can be leased and occupied.

The Report's Findings Section E, Items 4, 5, 6 and 7 erroneously objects to the Owner's proposed removal of nominal amounts of insignificant historic material and to the non-compatibility of the Owner's proposed new jambs, mullions, and muntins -- none of which can reasonably be considered defining characteristics of the building and most of which are damaged, rotted, and compromised by previous building owners and tenants -- and/or will need to be further compromised to accommodate new windows and doors.

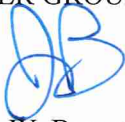
The Guidelines clearly state, "*Where original or early storefronts no longer exist or are too deteriorated to save, the commercial character of the building should be retained through: (1) contemporary design which is compatible with the scale, design, materials, color and texture of the historic buildings; or (2) an accurate restoration of the storefront based on historical research and physical evidence.*"

Based on selective investigative removal of parts of the existing storefront per HPC staff's recommendation, the Owner's experienced contractor has concluded that the retail storefronts are too deteriorated to save. HPC's staff option 2 cited above is not possible because it would not comply with code. The Owner's believes its proposed new storefronts are entirely compatible with the Guidelines in that they would retain the scale, design, materials, color and texture of the original features of the building.

The Report's Findings, Section E, Item 8 claims that the replacement of the storefronts will "...adversely affect the program for the Preservation and architectural control of the University-Raymond Commercial Historic Preservation District." This is entirely untrue. As previously noted, the storefronts have already been partially replaced or modified and the Report's suggestion for a patchwork re-use of limited, insignificant historic material is not possible. Even if it were possible, it would leave an awkward hodgepodge of old and new, and non-code compliant, un-occupiable storefronts. Ownership believes that the Report's suggestions would have far greater adverse affect on the District and the program for Preservation than would Owner's proposed new storefronts.

We finally note that full window replacement has already been approved on the Raymond Avenue and south facades of the C&E Flats project and the Owner respectfully requests that HPC support our application. Thank you.

Very Truly Yours,
EXETER GROUP LLC



Joseph W. Bergman
Development Manager